

WORK SESSION AGENDA

CITY COUNCIL WORK SESSION
TUESDAY
APRIL 13, 2021

STAFF CONFERENCE ROOM
SECOND FLOOR - CITY HALL
211 WEST ASPEN AVENUE
3:00 P.M.

ATTENTION

**IN-PERSON AUDIENCES AT CITY COUNCIL MEETINGS HAVE BEEN SUSPENDED UNTIL
FURTHER NOTICE**

The meetings will continue to be live streamed on the city's website
(<https://www.flagstaff.az.gov/1461/Streaming-City-Council-Meetings>)

PUBLIC COMMENT PROTOCOL

**The process for submitting a public comment has changed and public comments will no longer be
read by staff during the Council Meetings.**

All public comments will be taken either telephonically or accepted as a written comment.

Public comments may be submitted to publiccomment@flagstaffaz.gov

If you wish to address the City Council with a public comment by phone you must submit the
following information:

First and Last Name
Phone Number
Agenda Item number you wish to speak on

If any of this information is missing, you will not be called. We will attempt to call you only one
time. We are unable to provide a time when you may be called.

All comments submitted otherwise will be considered written comments and will be documented
into the record as such.

If you wish to email Mayor and Council directly you may do so at council@flagstaffaz.gov.

AGENDA

1. Call to Order

NOTICE OF OPTION TO RECESS INTO EXECUTIVE SESSION

Pursuant to A.R.S. §38-431.02, notice is hereby given to the members of the City Council and to the general public that, at this work session, the City Council may vote to go into executive session, which will not be open to the public, for legal advice and discussion with the City's attorneys for legal advice on any item listed on the following agenda, pursuant to A.R.S. §38-431.03(A)(3).

2. Pledge of Allegiance and Mission Statement

MISSION STATEMENT

The mission of the City of Flagstaff is to protect and enhance the quality of life for all.

3. ROLL CALL

NOTE: One or more Councilmembers may be in attendance telephonically or by other technological means.

MAYOR DEASY
VICE MAYOR DAGGETT
COUNCILMEMBER ASLAN
COUNCILMEMBER MCCARTHY

COUNCILMEMBER SALAS
COUNCILMEMBER SHIMONI
COUNCILMEMBER SWEET

4. Public Participation

Public Participation enables the public to address the council about items that are not on the prepared agenda. Public Participation appears on the agenda twice, at the beginning and at the end of the work session. You may speak at one or the other, but not both. Anyone wishing to comment at the meeting is asked to fill out a speaker card and submit it to the recording clerk. When the item comes up on the agenda, your name will be called. You may address the Council up to three times throughout the meeting, including comments made during Public Participation. Please limit your remarks to three minutes per item to allow everyone to have an opportunity to speak. At the discretion of the Chair, ten or more persons present at the meeting and wishing to speak may appoint a representative who may have no more than fifteen minutes to speak.

5. Review of Draft Agenda for the April 20, 2021 City Council Meeting

Citizens wishing to speak on agenda items not specifically called out by the City Council may submit a speaker card for their items of interest to the recording clerk.

6. Proclamation: Fair Housing Month

7. MOONSHOT at Northern Arizona Center for Entrepreneurship and Technology (NACET) Annual Update

8. Discussion on Public Notice of a Possible Primary Property Tax Levy Increase

9. Flagstaff Municipal Court Overview

10. City Attorney's Office Overview

11. State and Federal Legislative Updates

12. **Presentation and Discussion:** regarding the Community Development Block Grant Program's 2021-2025 Five-Year Consolidated Plan, the City of Flagstaff Analysis of Impediments to Fair Housing Choice and the 2021/2022 Annual Action Plan and Staff recommendations for CDBG PY 2021 fund allocations.
13. **COVID-19 Update**
14. **Public Participation**
15. **Informational Items To/From Mayor, Council, and City Manager; future agenda item requests**
16. **Adjournment**

CERTIFICATE OF POSTING OF NOTICE

The undersigned hereby certifies that a copy of the foregoing notice was duly posted at Flagstaff City Hall on _____, at _____ a.m./p.m. in accordance with the statement filed by the City Council with the City Clerk.

Dated this _____ day of _____, 2021.

Stacy Saltzburg, MMC, City Clerk

CITY OF FLAGSTAFF

STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: David McIntire, Community Investment Director
Date: 04/02/2021
Meeting Date: 04/13/2021



TITLE

MOONSHOT at Northern Arizona Center for Entrepreneurship and Technology (NACET) Annual Update

STAFF RECOMMENDED ACTION:

Hear the presentation from MOONSHOT to receive information on its recent, current and future efforts to support entrepreneurs and develop jobs and businesses in Flagstaff through the Innovation Mesa campus, and its business development services.

EXECUTIVE SUMMARY:

MOONSHOT has a contract with the City of Flagstaff to provide business development and property management services at the City's Innovation Mesa Campus. There are two buildings at the campus, the Incubator and the Accelerator. The buildings were partially funded through Economic Development Administration grants and are owned by the City. The buildings are subleased at below market rates to new or innovative businesses which comply with grant guidelines and fall within one of the approved sectors. MOONSHOT provides business coaching and development to businesses located on the campus. MOONSHOT also manages the day to day operations of the campus. The campus is a part of the City's efforts to support job growth and prosperity through economic gardening and fostering entrepreneurship.

INFORMATION:

Scott Hathcock, President and CEO of MOONSHOT, will provide information regarding MOONSHOT's efforts to enhance entrepreneurship and job growth through the contract and partnerships with the City, as well as in other regional, state and national endeavors. He will speak to recent business development initiatives, facility improvements, occupancy, accomplishments, and intentions in the year to come.

The City pays \$268,000 annually for the services MOONSHOT provides. Of this sum, \$208,000 is for business development and \$60,000 is for building and tenant management services. The City receives all lease revenues from the campus, and the revenues are used to help pay for the program and pay existing debt for the campus. The program is also funded in part with revenues from Bed, Board, and Beverage (BBB) tax revenues that are set aside for economic development. The BBB tax is the 2% local transaction privilege tax rate on gross revenues of hotels, motels, and restaurants, in addition to the base 2.281% local tax rate.

MOONSHOT's existing Master Lease Agreement was approved in December 2018 and became effective January 1, 2019. It is a 5-year agreement which expires December 31, 2023 unless extended.

Attachments: MOONSHOT Presentation



 **Moonshot** at NACET

OUR LOCAL IMPACT

MOONSHOT AT NACET CAMPUS TOTAL INVESTMENT FUNDS



2019 - \$3,482,561

2020 - \$224,600

2021 Q1 - \$1,757,206



MOONSHOT AT NACET CAMPUS

TOTAL REVENUE GENERATED



2019

\$5,620,635

2020

\$4,778,869

JOBS

 **Moonshot** at NACET

**MOONSHOT AT NACET
CAMPUS TOTAL JOBS
RETAINED AND
CREATED**

2019

- Retained 259 jobs from 2018
- Created 44 new jobs

2020

- Retained 298 jobs from 2019
- Created 10 new jobs

MOONSHOT AT NACET CAMPUS

OCCUPANCY RATES AND NEW TENANTS

OCCUPANCY RATES

Incubator: 91%
Accelerator: 53.3%
Total: 62%

NEW TENANTS

PDR Film/Winter Communication
AZ Integrative Hypnotherapy
AZ Ionics, INC
Elevated Manufacturing
Bee Well
Terraform Development



2021 UPCOMING EVENTS

HIGH SCHOOL HIRE SUMMER DAY CAMP

High School Hire is a 5-Day interactive day camp culminating in a job fair with local employers. Moonshot Mentors teach Northern Arizona high school students best practices for job hunting, interviewing, and personal branding.

COMING SOON

✦ *Sponsorship Opportunities Still Available*

Moonshot Pioneer

Educational Programs



ENTREPRENEURSHIP INTERN CERTIFICATION

For 12 weeks, university students experience a high-level introduction of Moonshot's Track 1 entrepreneurial curriculum for the purpose of understanding the basic fundamentals that entrepreneurs utilize to build successful start-ups. Students can apply what they learn to best market themselves as possible future interns or employees to start-up founders within the Moonshot network and beyond.

Instructors/mentors are Moonshot mentors and/or members ranging from CEOs to angel investors to award-winning entrepreneurs.

The pilot program with NAU is currently comprised of **12 students**.



FALL SEMESTER 2021

2021

 **Moonshot** at NACET

WE MEAN BUSINESS WOMEN ENTREPRENEURS & BUSINESS LEADERS

Coffee Meetups for Moonshot Thinking Leaders

JANUARY 14, 2020 FROM 8AM-9AM
SINGLE SPEED COFFEE
2 S BEAVER ST, FLAGSTAFF, AZ

MOONSHOTAZ.COM/WEMEANBUSINESS





Moonshot at NACET

CITY OF FLAGSTAFF

STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: Rick Tadder, Management Services Director
Co-Submitter: Brandi Suda, Finance Director
Date: 03/23/2021
Meeting Date: 04/13/2021



TITLE

Discussion on Public Notice of a Possible Primary Property Tax Levy Increase

STAFF RECOMMENDED ACTION:

Discuss and receive direction from City Council related to posting a Public Notice related to a possible Primary Property Tax Levy (revenues) increase.

EXECUTIVE SUMMARY:

City staff is seeking Council direction on posting a 60-day website notice related to Primary Property Tax. A notice is required to be posted on the City website and distributed through social media at least 60 days prior to adoption of a new tax or fee, or an increase in the rate of a tax or fee, per A.R.S. Section 9-499.15 ("60-day notice"). In past years, the City has posted the 60-day notice in the event Council would be considering adoption of either an increase in either the Primary Property Tax levy (revenues) or the Primary Property Tax rate. As the language of the statute has changed, it no longer appears necessary to post a 60-day notice if the rate is not being increased. For the next fiscal year, there will not be a rate increase in the Primary Property Tax because our maximum allowable rate must be lower than the current year due to increases in property valuations.

If Council gives direction to increase our Primary Property Tax levy (revenues) the City is required to publish Truth in Taxation notices in the local newspaper, per A.R.S. Section 42-17107. City staff is asking Council they would like to provide a 60-notice. Posting the 60-day notice on the City's website does not commit the City to increase the levy.

INFORMATION:

City staff is seeking City Council direction on whether it desires to post a 60-day notice on the City's website prior to consideration of adoption of an increase in the Primary Property Tax levy (revenues).

Arizona's statutes allow cities to increase their Primary Property Tax levy (revenues) by 2% annually, excluding new construction added to the assessment rolls. If the cities do not utilize the maximum allowable levy, the increase is available in future years in addition to 2% allowed annually. The City did not assess the increase levy for FY 2020-21, and therefore we are allowed to increase the levy up to 4%, \$284,000, for the next fiscal year.

Arizona Revised Statutes Section 9-499.15 requires posting of a 60-day notice on the City website and social media if the City proposes to impose a new tax or fee, or increase the rate of an existing tax or

fee. The public notice includes posting on our website and social media. The deadline to post the notice is April 15, 2021.

In past years, the City has posted the 60-day notice in the event Council would be considering adoption of either an increase in either the Primary Property Tax levy (revenues) or the Primary Property Tax rate. As the language of the statute has changed, it no longer appears necessary to post a 60-day notice if the rate is not being increased.

The current Primary Property Tax rate is 0.7510 per net assessed valuation and the maximum allowable rate, with the 4% levy increase, is \$.7476 per net assessed valuation. The rate will not be increasing for the next fiscal year.

Arizona Revised Statutes Section 42-17107 requires publication of Truth in Taxation notices in the local newspaper if the City considers increasing our Primary Property Tax levy (revenues) by any amount above the prior year's levy plus new construction. Should Council give direction at the April Budget Retreat to increase the levy the publication requirements will begin late May. The process will include posting a notice in our local newspaper twice as well as a public hearing during budget adoption.

The current City Manager budget proposal will be discussed on April 22 and 23, 2021 at the Budget Retreat. The proposal does not include a recommendation to increase the Primary Property Tax levy. During the retreat, the City Council will have the ability to provide direction to amend the proposed budget. Decisions could include balancing the proposal by adding items to fund with potential offsets of deleting items that are currently proposed. In addition, the Council could propose a Primary Property Tax levy increase, up to 4%, to fund additional items or programs at the Council's request.

If the Council would like to discuss the option of increasing the Primary Property Tax levy at the Budget Retreat, staff recommends posting a 60-notice on the City website and through social media. As part of the posting we would provide the public with information to be considered at the Budget Retreat.

Attachments: [Presentation](#)

Discussion on Notice of Primary Property Tax Increase

City Council April 13, 2021





Primary Property Taxes Statutes

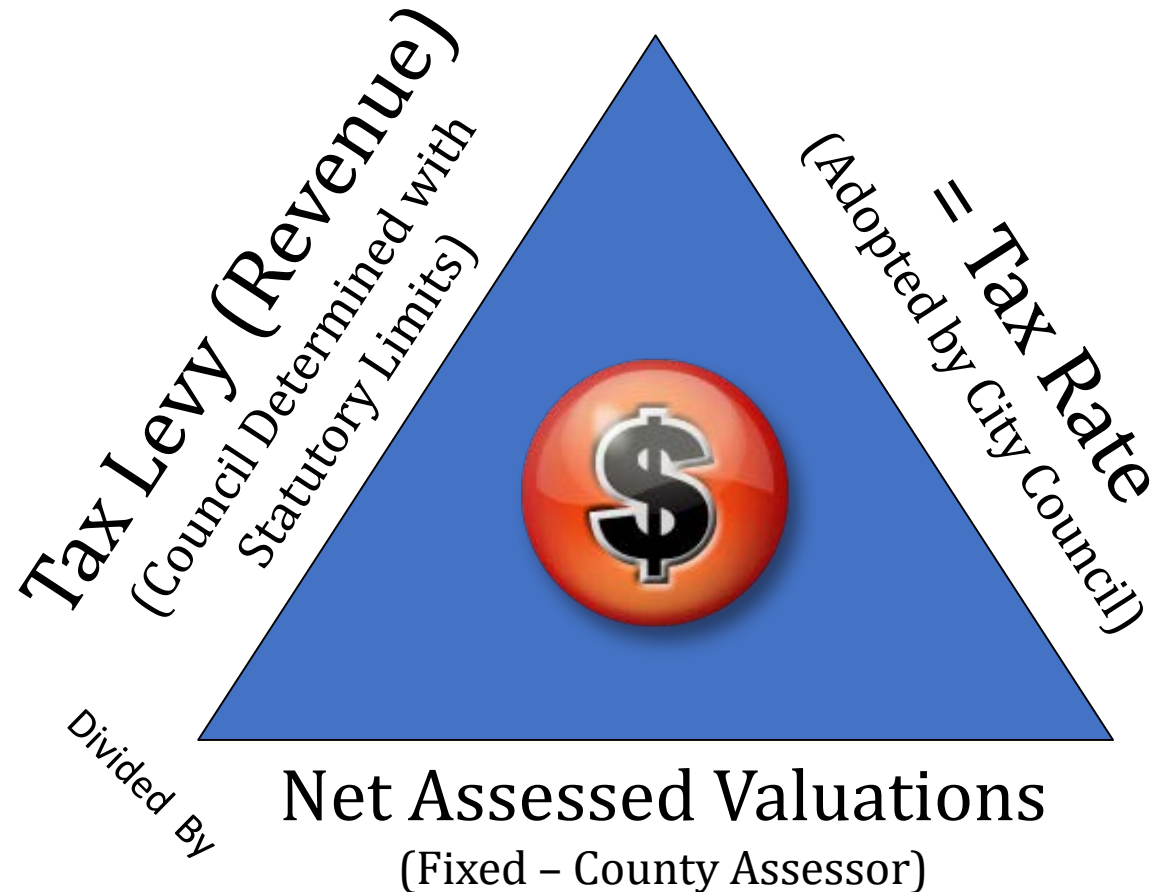
- AZ Statute 42-17051: Allows municipalities a 2% increase in Primary Property Tax Levy, plus new construction.
- AZ Statute 15-1461.01, Truth in Taxation: If municipalities increase their levy, rules for advertising in local paper and public hearing apply
- AZ Statute 9-499.15: Related to new or increase taxes or fees, sets forth requirements to post public notice 60-days prior to adoption
 - Unclear if a Levy increase is included, as a precaution we post a notice



Primary Property Taxes

Anatomy of Primary Property Taxes

Tax Levy (Revenue) / Net Assessed Valuation (AV) = Tax Rate





Net Assessed Property Values

- Determined by the County Assessor's Office
- Values based on valuation in late 2019 for Tax Year 2021
- Limited assessed value is used to calculate both the primary and secondary property tax per State Statutes
- Limited assessed value is limited to maximum 5% increase per year for most real property
- New construction 1.3%, \$12M Net Assessed Value

	Tax Year 2020 (FY 2020-21)	Tax Year 2021 (FY 2021-22)	Change
Limited Net Assessed Value	\$ 925,765,090	\$ 979,496,706	5.8%
Full Cash Net Assessed Value	\$ 1,123,106,392	\$ 1,187,412,636	5.7%



Primary Property Tax

- City Council Adopts the Tax Rate to match the Levy
 - Council could choose to approve flat, decreased or increased levy
- Impacts to property owners based on change in AV

	Tax Rate	Tax Levy
Current Tax Levy <i>FY 2020-21 Adopted</i>	0.7510	\$ 6,952,496
Flat Levy (+ New Construction) <i>No Truth in Taxation or 60-day notice</i>	0.7186	\$ 7,038,663
Maximum Levy Allowed (4%) <i>Truth in Taxation and 60-day notice</i>	0.7476	\$ 7,322,717 +\$284,054



Primary Property Tax

- Current City Manager Budget Proposal is for a flat levy
- During the April Retreat, the Council could give direction to increase the levy to fund additional operations as desired
- Posting a notice does not require a levy increase.

Does the City Council want staff to post a 60-day notice for the available increase in the Primary Property Tax Levy?

CITY OF FLAGSTAFF STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: Jessica Cortes, Court Administrator
Date: 03/18/2021
Meeting Date: 04/13/2021



TITLE

Flagstaff Municipal Court Overview

STAFF RECOMMENDED ACTION:

This presentation is for informational purposes only.

EXECUTIVE SUMMARY:

The Flagstaff Municipal Court is responsible for the adjudication and disposition of all local code violations, criminal misdemeanor, criminal traffic, and civil traffic cases that occur within the Flagstaff City limits.

INFORMATION:

The overview of the Flagstaff Municipal Court will include information on:

- Budget
- Organizational Structure
- Court Operations
- Court Services
- Court Events
- Specialty Courts
- Accomplishments & Initiatives

Attachments: [Presentation](#)



CITY COUNCIL - DIVISION INTRODUCTION

Flagstaff Municipal Court

APRIL 13, 2021



Agenda



- Mission & Vision
- Budget Information
- Organizational Chart
- Court Operations
- Court Services
- Court Events
- Specialty Courts
- Accomplishments & Initiatives





Flagstaff Municipal Court



Mission

The mission of the employees of the Flagstaff Municipal Court is to foster a positive and productive environment that promotes the efficient and effective administration of justice.

Vision

To provide the public with a court system that fairly and impartially administers justice and efficiently resolves disputes.



Budget

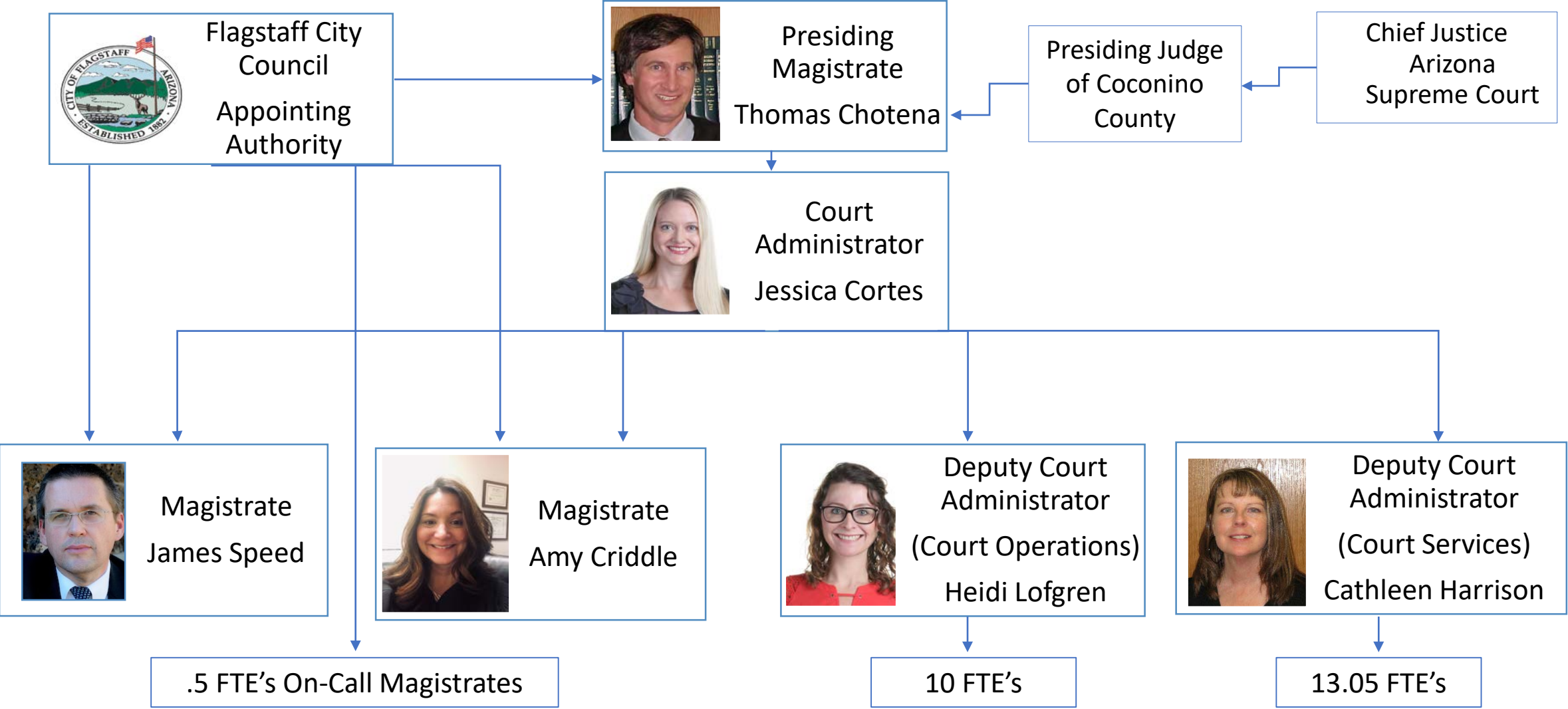


Fiscal Year 2020-2021 Budget Information

- Base Budget \$875,972
- On Going Funding Request \$182,800
- One Time Funding Request \$226,317
- Total Budget \$1,285,089

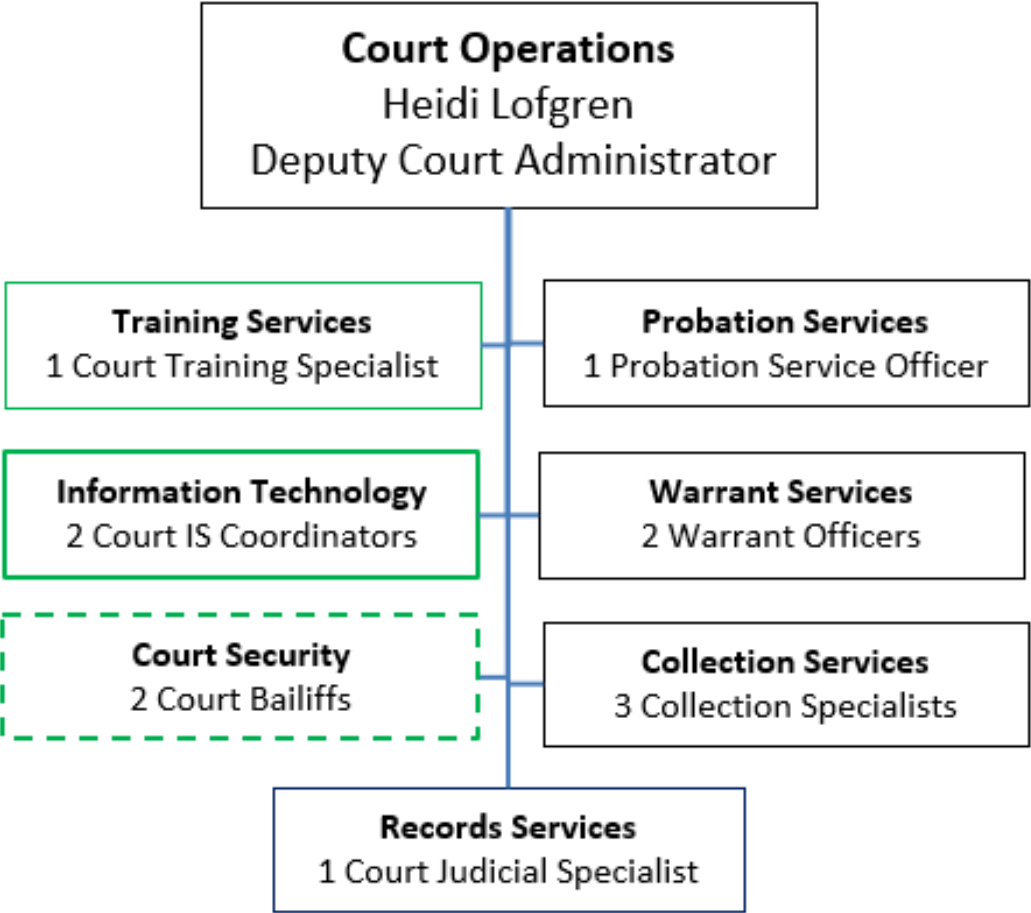


Court Organizational Chart



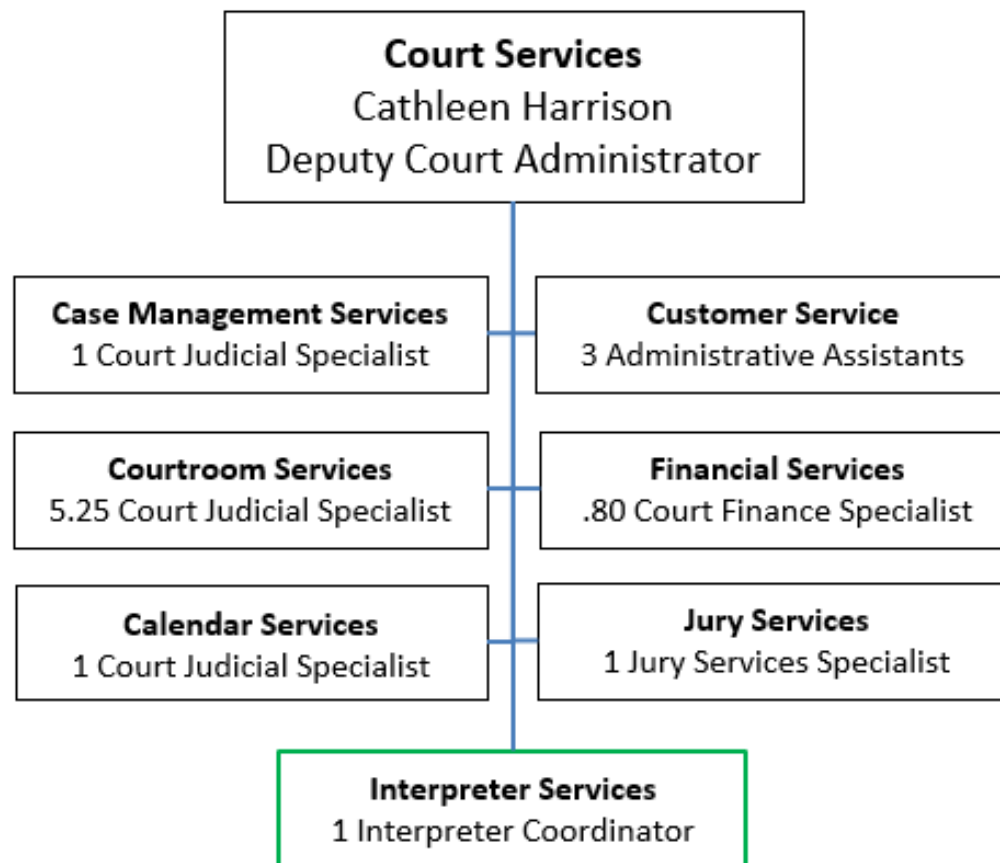


Court Operations





Court Services





Court Events



- Initial Appearances
- Arraignments
- Pre-Trial Conferences
- Non-Jury Trials & Jury Trials
- Civil Traffic Court
- Contested Parking Hearings
- Protective Order Hearings





Specialty Courts



- Mental Health Court
- Veteran's Court
 - High Country Stand Down
 - May 14, 2021
- Tuba City Judicial District Court





Accomplishments & Initiatives



Accomplishments

- Courthouse Project Completed
- Virtual Court Training Conference
- Received Grant Funding to Perform Essential Court Operations Throughout COVID-19 Pandemic

Initiatives

- Justice 2040 Strategic Planning Event
- Technology Advances Through the Criminal Justice Integration Project
- Electronic Document Management System





Thank you

CITY OF FLAGSTAFF STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: Sterling Solomon, City Attorney
Date: 04/09/2021
Meeting Date: 04/13/2021



TITLE:

City Attorney's Office Overview

DESIRED OUTCOME:

This item is for informational purposes only.

EXECUTIVE SUMMARY:

The City Attorney's Office assures the legality of the official business of the City of Flagstaff by providing legal advice and opinions to the Mayor and Council, the City Manager, the City Departments, and the City's Boards and Commissions. This division represents the City in civil litigation and represents the City and the State of Arizona in criminal misdemeanor cases occurring within the City limits. It also prepares or reviews all contracts, ordinances, resolutions, or other legal documents involving the City.

INFORMATION:

The City Attorney represents the City of Flagstaff as a municipal corporation, and the division prosecutes misdemeanor crimes and provides legal advice and representation only to City staff and City officials. The division does not provide legal representation or advice to persons outside the organization.

Attachments: City Attorney's Office Presentation



CITY COUNCIL - DIVISION INTRODUCTION

City Attorney

APRIL 13, 2021



- Overview of Division
- Org Chart and Division Managers/Directors, FTE's
- Budget Information
- Look at FY21
- Other



Prosecution Section

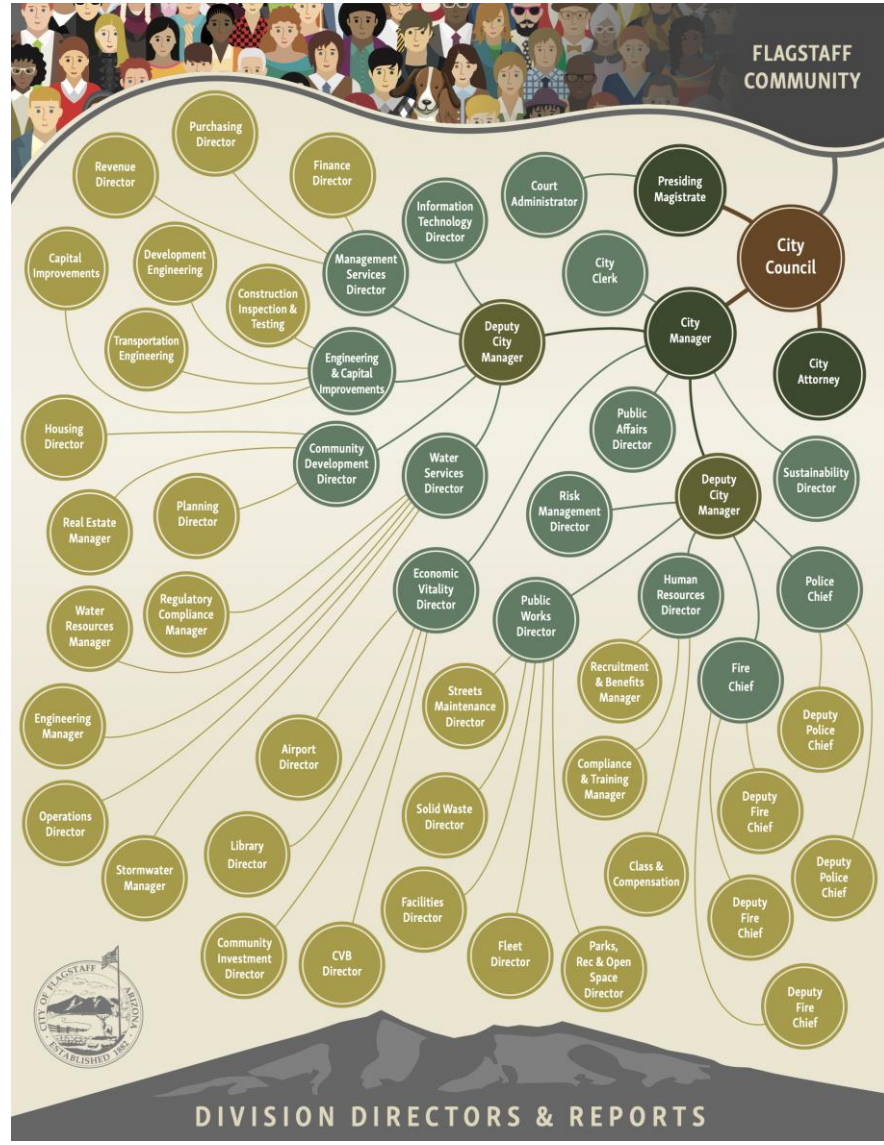
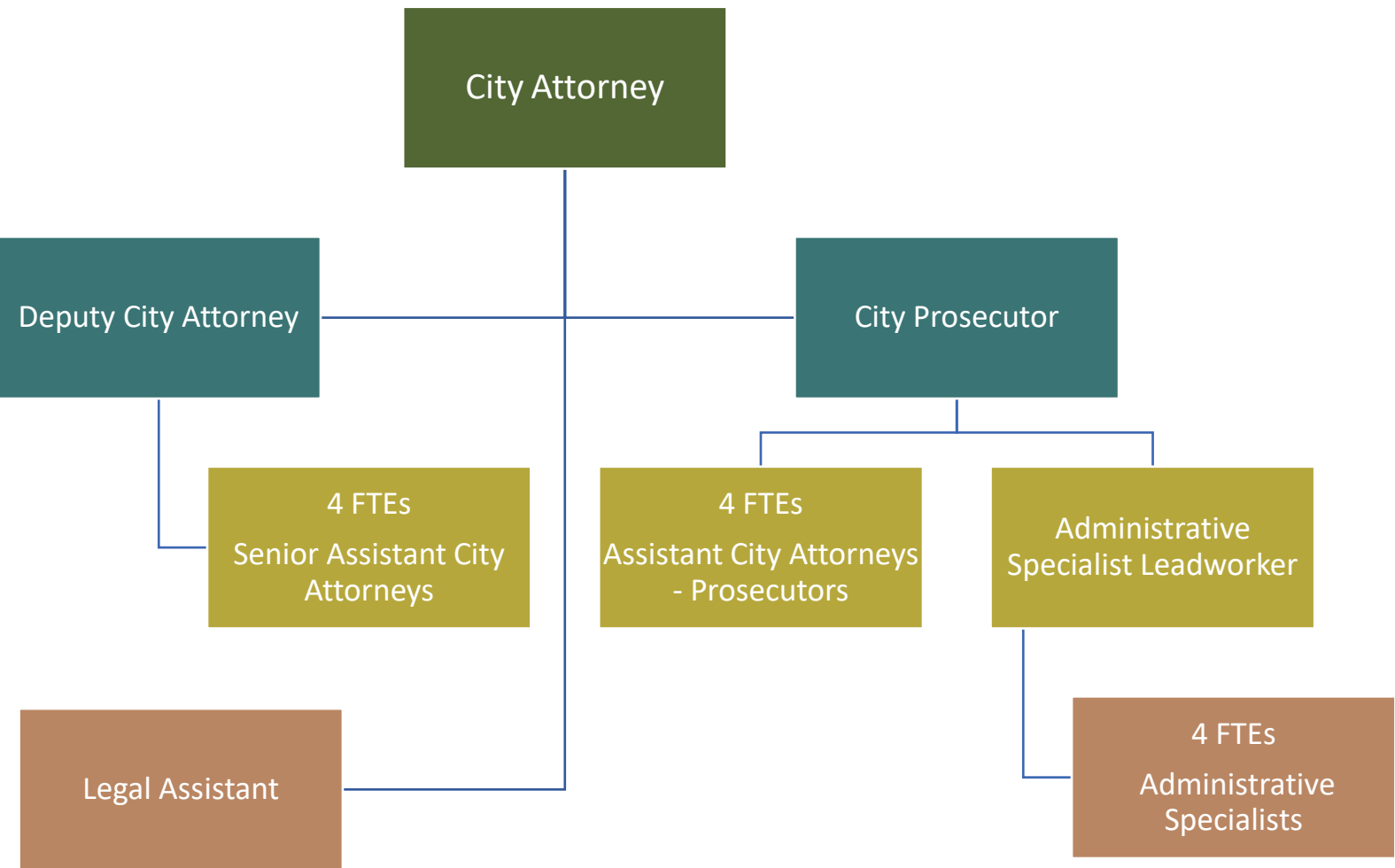
- Represents the City and the State of Arizona in criminal misdemeanor cases occurring within the City limits.

Civil Section

- Provides legal advice and opinions to the Mayor and Council, City Manager, City divisions, and the City's boards and commissions.
- Represents the City in civil litigation.
- Prepares or reviews all contracts, ordinances, resolutions, and other legal documents involving the City.

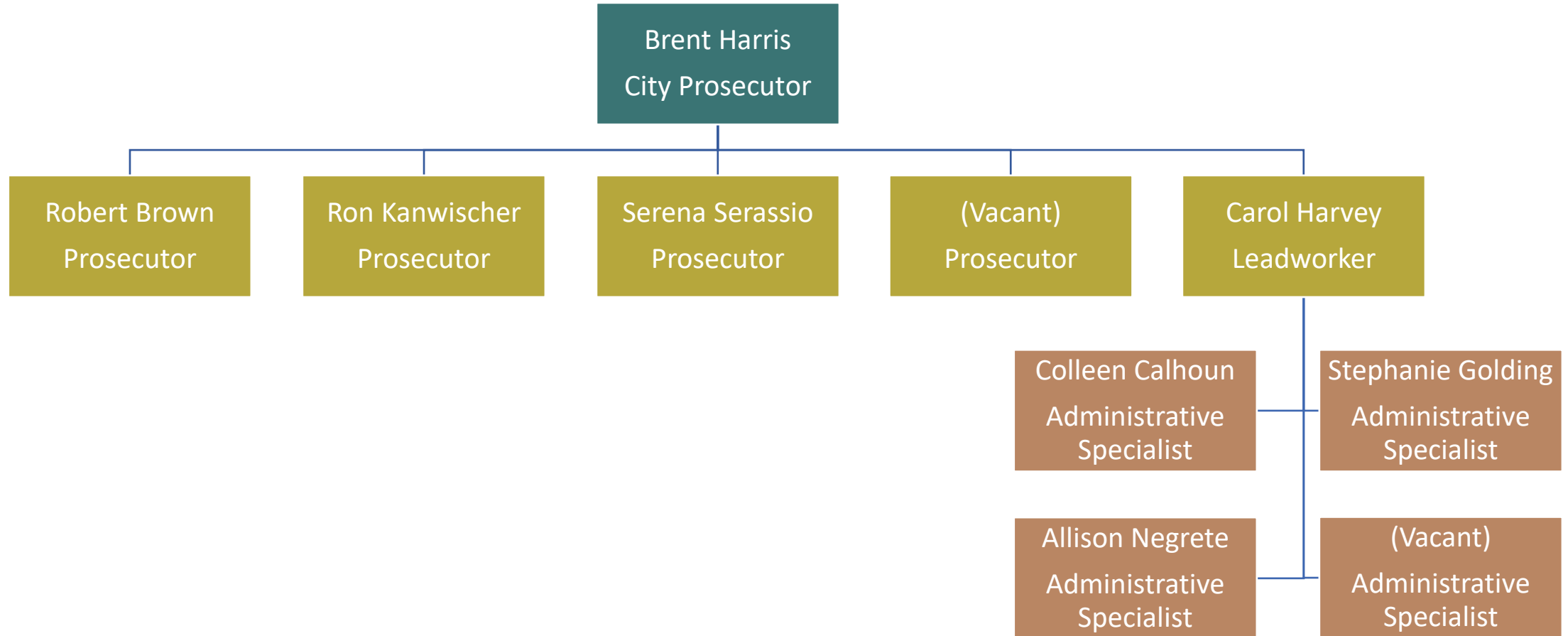


Organization Chart



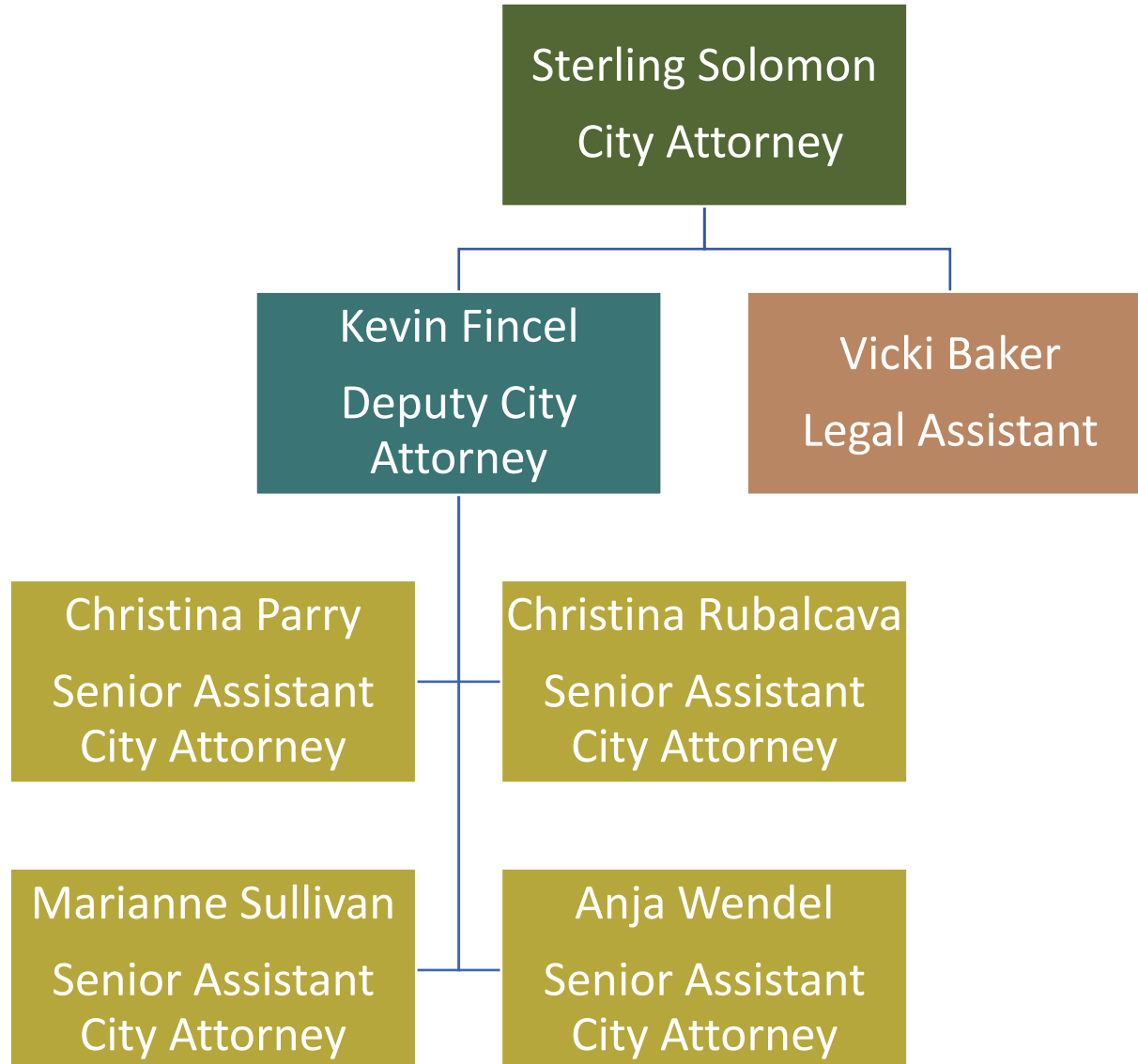


Org Chart – Prosecution Section





Org Chart – Civil Section





Thank you

**CITY OF FLAGSTAFF
STAFF SUMMARY REPORT**

To: The Honorable Mayor and Council
From: Stacy Saltzburg, City Clerk
Co-Submitter: Sarah Langley
Date: 04/08/2021
Meeting Date: 04/13/2021



TITLE

State and Federal Legislative Updates

STAFF RECOMMENDED ACTION:

Discussion and Direction from Council

EXECUTIVE SUMMARY:

Staff will provide updates on bills and will respond to requests for information or advocacy from Council on an as needed basis

INFORMATION:

Attachments:

CITY OF FLAGSTAFF

STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: Kristine Pavlik, Housing and Grants Administrator
Date: 03/24/2021
Meeting Date: 04/13/2021



TITLE:

Presentation and Discussion: regarding the Community Development Block Grant Program's 2021-2025 Five-Year Consolidated Plan, the City of Flagstaff Analysis of Impediments to Fair Housing Choice and the 2021/2022 Annual Action Plan and Staff recommendations for CDBG PY 2021 fund allocations.

DESIRED OUTCOME:

The desired outcome of the April 13, 2021, City Council work session is to inform Council of three separate documents required by the US Department of Housing and Urban Development (HUD) as part of the Community Development Block Grant Program (CDBG). The 2021-2025 Consolidated Plan, 2021/2022 Annual Action Plan, and the Analysis of Impediments to Fair Housing Choice are due to be submitted to HUD on May 15, 2021, and are required in order for the City of Flagstaff to maintain its compliance with federal CDBG regulations.

Staff will provide Council with a presentation regarding the 2021-2025 Consolidated Plan and community needs that were identified through an extensive public participation process as well as proposed goals, activities, and objectives to guide the use of CDBG funds for the next five years. The presentation will include an overview of the findings from the Analysis of Impediments of Fair Housing Choice and the established Fair Housing Plan goals. Lastly, a presentation and discussion of the 2021 CDBG proposals that were received will be provided. Staff will review each proposal and will provide funding recommendations. Staff will be back in front of the Council on April 20th for approval.

The attached staff summary (for April 20th) is for the approval of the City of Flagstaff's 2021-2025 Five-Year Consolidated Plan, the City of Flagstaff Analysis of Impediments to Fair Housing Choice, and the 2021/2022 Annual Action Plan, authorizing submission to the U.S. Department of Housing and Urban Development (HUD) as part of the Community Development Block Grant (CDBG) process.

EXECUTIVE SUMMARY:

Please review April 20 Staff Summary in *Attachments*.

INFORMATION:

Please review April 20 Staff Summary in *Attachments*.

Attachments: [April 13 CDBG Presentation](#)
[April 20 CDBG Staff Summary](#)

Analysis of Impediments

Consolidated Plan and Annual Action Plan

City of Flagstaff Community Development Block Grant

2021-2025 Consolidated Plan, Analysis of
Impediments to Fair Housing Choice and
2021/2022 Annual Action Plan



Kristine Pavlik, Housing and Grants Administrator



Purpose & Agenda

- Share priority needs, goals and activities identified for the 2021-2025 Consolidated Plan
- Share findings and goals from the Analysis of Impediments to Fair Housing Choice
- Share agency proposals received for the use of 2021/2022 CDBG funding and provide funding recommendations

- **Agenda**

- Quick CDBG Overview
- Analysis of Impediments to Fair Housing Choice
- Con Plan Priority Needs and Goals
- Proposals Received and Funding Recommendations
- Questions and Discussion





CDBG Overview

What is the Community Development Block Grant?

- Federal grant program administered by HUD.
- Created in 1974 to provide funding for housing and community development activities, serving primarily low to moderate income individuals and households.

Why does the City of Flagstaff receive CDBG funding?

- Metropolitan city, Population > 50,000
- Entitlement Community
- Annual allocation based on a formula





CDBG Overview



National and Primary Objective

- The development of viable urban communities through the provision of the following, principally for low- and moderate-income persons:
 - Decent housing
 - A suitable living environment
 - Economic opportunity



How can the City spend the money?

As the City Council determines based on:

- Needs identified in the Consolidated Plan
- The National Objective
- One or more of the Primary Objectives



CDBG Overview

Benefiting low to moderate income persons

To be eligible, an activity must qualify as one of the following National Objectives:

1. Limited Clientele
2. Housing Activity
3. Area Benefit
4. Job Creation or Retention Activities





CDBG Overview



Criteria for use of CDBG Funds

- At least 70% of the CDBG funds must benefit low to moderate income persons over the fiscal year (July 1 to June 30)
- Historically CDBG in Flagstaff serves 100% low to moderate income persons





CDBG Overview

How does the City access the funds?

- **Annual Action Plan** – 1 year plan - “What are we are going to do?”
Due every May
- **Consolidated Annual Performance Evaluation Report (CAPER)** –
1 year report - “What did we do?” - Due every September
- **Consolidated Plan** - “5-year assessment of housing and community development needs” Every 5 years - Due in May 2021
- **Analysis of Impediments to Fair Housing choice** “Fair Housing Plan”
Every 5-years – Due May 2021
- **Substantial Amendments to Annual Action Plan** – CDBG-CV Funds or Misc. Allocation Due as needed



Annual Action Plan Process

Timeline

- Notice of Funding Available (NOFA) released December 28th, 2020
- Public Meeting #1 - December 28th
 - Intro to CDBG Program and City of Flagstaff NOFA Process
- Applications Due February 22nd at 4pm
- Public Meeting #2 - February 26th
 - Summary of applications and funding requests as well as Con Plan Presentation
- DRAFT Annual Action Plan/Con Plan and AI Public Comment Period
 - March 1st to April 15th
- City Council Work Session April 13th
 - Housing Staff Funding Recommendations and direction from Council
- City Council Meeting April 20th
 - Council resolution approving AAP/Con Plan and AI submission to HUD



Analysis of Impediments to Fair Housing Choice



- Required for continued CDBG funding and commitment to Affirmatively Further Fair Housing (AFFH)
- Identifies fair housing problems (impediments) faced by people seeking housing in the City of Flagstaff
- Develops a Plan of Action to address current impediments



Analysis of Impediments to Fair Housing Choice



- **Public and Stakeholder Consultation**

- **Community-wide Fair Housing Online Survey**
 - 84 Responses
 - Promoted on Facebook
- **Stakeholder Fair Housing Online Survey**
 - 44 Responses
 - Sent to Housing Case Managers, Real Estate Agents, Property Management Companies, Landlords, etc.

- **Data Analysis**

- HUD eCon Planning Suite
- Fair Housing Complaints & Testing Data from Southwest Fair Housing Council
- 2010 Decennial Census & 2015/19 American Community Survey
- Community Planning and Development Maps
- HUD Community Housing Affordability Strategy Data

- **Regulation, Policy, Ordinance Review**

- **National Studies**



Complete the City of Flagstaff 2020 Fair Housing Survey

Did you know you have a right to choose housing - **free** from discrimination?

Fair housing laws apply to rental housing, homes for sale, advertising, home loans and home insurance.

Federal and state fair housing acts prohibit discrimination in housing based on race, color, national origin, religion, sex, disability and familial status.



English

To access the survey use the QR codes or web addresses below!

English: tinyurl.com/y48jm8zp

Spanish: tinyurl.com/y5m693cf



Spanish

Help us identify whether barriers to Fair Housing exist in Flagstaff, Arizona.

Your input is very important!





- Lack of Affordable Housing Limits Housing Choice
- Lack of landlords willing to accept Housing Choice Vouchers
- Lack of community awareness of Fair Housing Laws and reporting
- Minority & Low-Income Areas of Concentration
- Lack of Accessible Housing





Fair Housing Goals

Fair Housing Goals

- Increase affordable housing opportunities
- Create public awareness of fair housing laws and affordable housing advocacy
- Promote equal opportunity and prevent unlawful discrimination by providing relevant training, reliable information and targeted outreach.
- Create local and regional policy changes that create more affordable housing, outside of minority concentrated areas
- Improve housing opportunities for individuals with disabilities
- Provide Community Education on Housing Choice Vouchers for Landlords and Property Managers





Action Plan



Education and Outreach

- Publish fair housing information in housing newsletters, the City website and Social Media Pages
- Annually proclaim April as Fair Housing Month
- Sponsor a Fair Housing event in April for Fair Housing Month
- Distribute Fair Housing referral information in English and Spanish
- Sponsor no less than 3 Fair Housing trainings annually target both housing sector stakeholders and community residents
 - Disability accessibility
 - Rentals and the use of Criminal Records in housing
 - Extended protections under Sex/Gender
 - Emotional support animals





Action Plan

- Display the Fair Housing Logo on business cards and in program marketing information
- Maintain a Fair Housing page on the City website
- Prioritize funding for owner and renter occupied housing rehabilitation to provide disabled LMI accessibility adaptations with deferred loans and grants and incentivize rental occupied housing rehabilitation programs for landlords adapting units for accessibility
- Reach out to minority and other protected classes to encourage their participation in fair housing planning and education opportunities.
- Provide training and undertake recruitment of landlords and property managers for Housing Choice Vouchers – Improve public and stakeholder impression of HCV clients

**Furthering
Fair Housing**

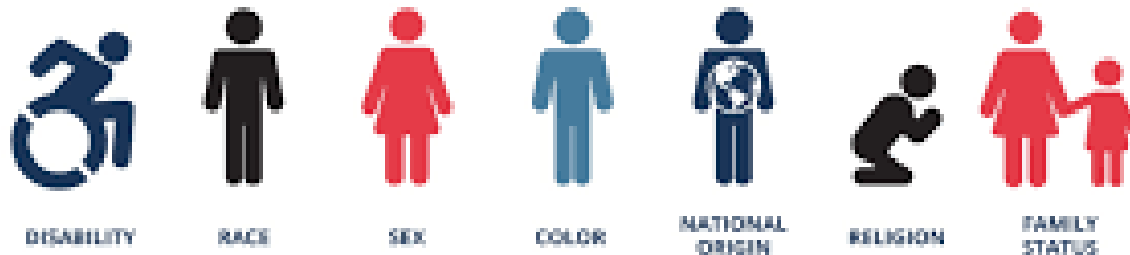




Action Plan

- Track the volume of residents, landlords and industry stakeholders participating in community education activities
- Encourage the development of housing accessible to or adaptable for persons with disabilities
- Develop a comprehensive Housing Plan for the City of Flagstaff including information on Fair Housing, Housing Choice, and efforts to increase affordable and accessible housing units
- Consider a media campaign to combat NIMBY (Not in My Backyard) and to destigmatize low- and moderate income households and individuals who utilize Housing Choice Vouchers

FAIR HOUSING ACT





Next Steps



- **Public Comment**
 - **Ends April 15, 2021**
- **Incorporate written comments into the plan**
- **Submit to HUD with the 2021-2025 Consolidated Plan**



Consolidated Plan Process

Focus Group Meetings

- Dec 7th – Neighborhood Revitalization, Public Facilities and Infrastructure
- Dec 9th – Public Services and Economic Opportunities
- Dec 14th - Addressing Homelessness
- Dec 16th – Decent Affordable Housing
- Dec 17th – Housing Commission Meeting

Data Collection, Stakeholder Engagement & Community Outreach

- August through December
 - Surveys – 24 Responses
 - Focus Groups – 16 unique attendees
 - Data Collection

Data Analysis and Draft Documents

- January and February

2021 AAP Process

- Jan-March

Drafts Available for Public Comment

- March 1st to April 15th
Council Meetings
- Presented April 13th
- Adopted April 20th

Final Documents Submitted to HUD

- May 15th, 2021



Consolidated Plan 2021-2025

- Identifies local community needs
- Includes housing and non-housing needs
- Sets goals and objectives for the 5-year period
- Prioritizes and guides activities
- Required by HUD for funding
- Identifies Target Neighborhoods
 - Sunnyside
 - Southside
 - La Plaza Vieja
 - Pine Knoll





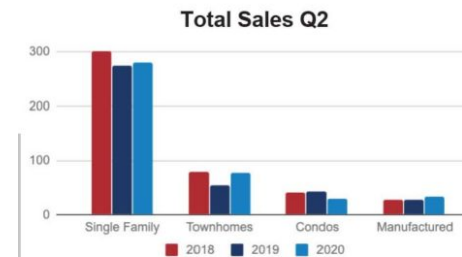
Consolidated Plan Strategies

Main Components

- Market Analysis
- Analysis of Impediments to Fair Housing Choice
- Socio-economic Conditions
- Housing Conditions and Needs Assessment
- Homeless and Special Needs Individuals and Families
- Data Analysis
 - HUS eCon Planning Suite – CPD Maps and CHAS
 - Prior funding requests and outcomes
- Non-housing Community Development

Related Element Assessments

- Affordable housing
- Homelessness and special needs populations
- Non-housing community development
- Barriers to affordable housing
- Lead-based paint
- Anti-poverty
- Institutional Structure and Coordination





Community Needs

How are Needs and Priorities Determined?

- Review of Data
 - Census/ACS Data, Market Analysis, Needs Assessment
- Community Surveys
- Stakeholder Surveys
- Public and Stakeholder Focus Groups
 - Housing Commission
 - Continuum of Care
- Meetings with Stakeholders
- Public Meetings/Hearings

LET YOUR VOICE BE HEARD!

Complete the City of Flagstaff 2020 Fair Housing Survey

Did you know you have a right to choose housing – **free** from discrimination?

Fair housing laws apply to rental housing, homes for sale, advertising, home loans and home insurance.

Federal and state fair housing acts prohibit discrimination in housing based on race, color, national origin, religion, sex, disability and familial status.





English



Spanish

To access the survey use the QR codes above or web addresses below!

English: tinyurl.com/y48jm8zp
 Spanish: tinyurl.com/y5m693cf





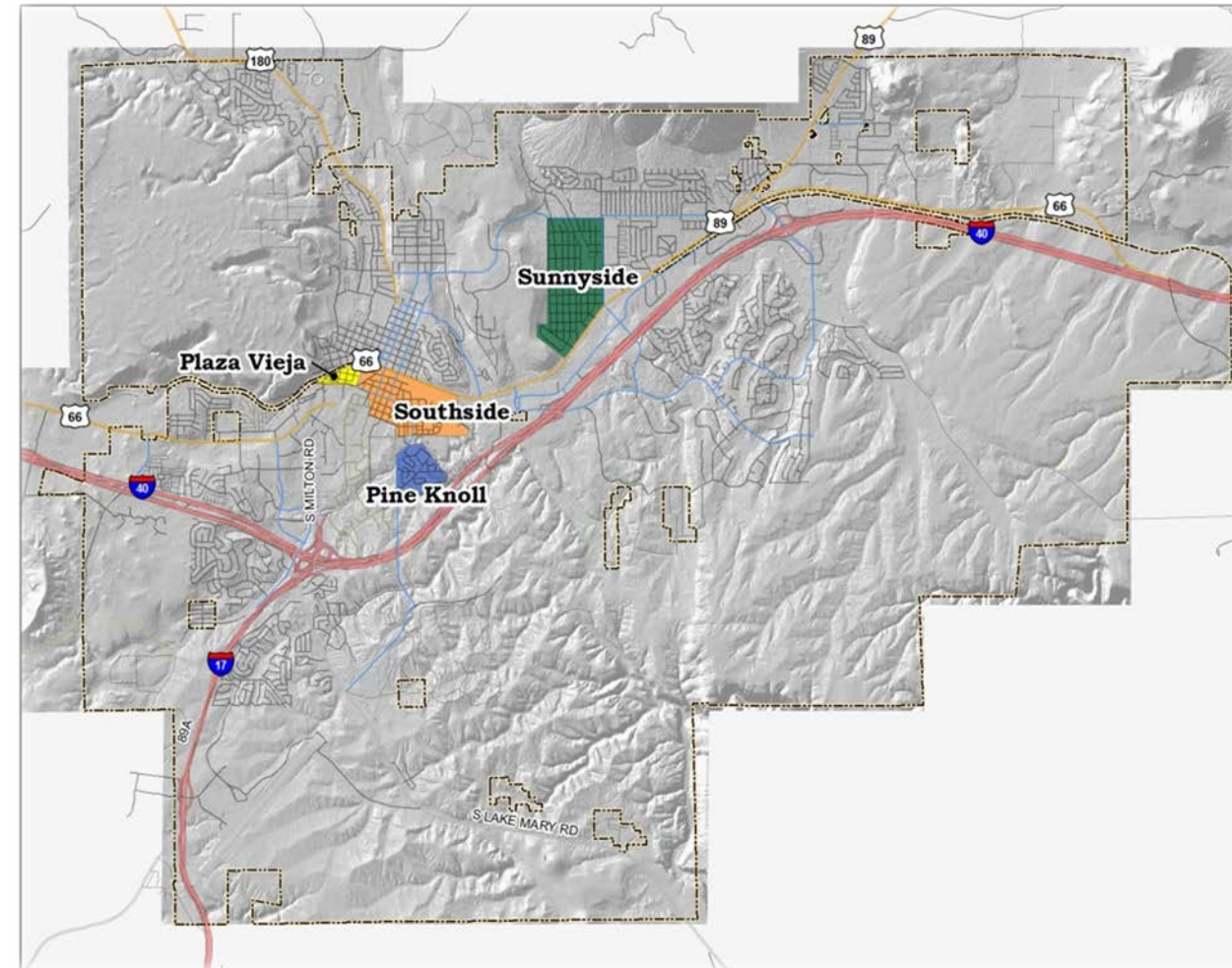
Help us identify whether barriers to Fair Housing exist in Flagstaff, Arizona.
Your input is very important!



Target Areas

The City will continue to designate four target areas. These target areas encompass many of the areas of low-income and minority concentration:

- **La Plaza Vieja**
 - Census Tract 11.02, Block Groups 1 & 3.
- **Sunnyside**
 - Census Tract 3, Block Groups 2, 3, & 4.
- **Southside**
 - Census Tract 8, Block Group 1.
- **Pine Knoll**
 - Census Tract 8, Block Group 2.





2021-2025 Con Plan Goal Setting

Priority Need: Neighborhood Revitalization, Public Facilities & Infrastructure

- **Neighborhood Facility and Infrastructure Improvements**
 - Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband
- **Public Facilities**
 - Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements
- **Land/Real Property Acquisition for Affordable Housing Development**

Priority Need: Public Services and Economic Opportunities

- **Services to Meet Basic Needs**
 - Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.
- **Workforce Development**
 - Employment, Job Training and Small Business Assistance Services
- **Housing Stabilization Services**
 - Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services



2021-2025 Con Plan Goal Setting

Priority Need: Addressing Homelessness

- Service and Facility Operating Support, including Outreach
- Increase number of emergency/transitional shelter and permanent supportive housing beds

Priority Need: Decent Affordable Housing – Ownership & Rental

- Housing Rehabilitation
- Housing Development
- Housing Assistance





2021-2025 Consolidated Plan Goals

Activity	Special Population	Priority Level	5-year Goal
<u>Priority Need: Neighborhood Revitalization, Public Facilities & Infrastructure</u>			
Neighborhood Facility and Infrastructure Improvements - <i>Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.</i>		High	3,000 people
Public Facilities - <i>Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.</i>	X	High	100 people
Acquisition for Affordable Housing Development - <i>Land/ Real Property/ Etc.</i>		Low	3 units
<u>Priority Need: Public Services & Economic Opportunities</u>			
Services to Meet Basic Needs - <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>	X	High	300 people
Workforce Development - <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>	X	Low	15 people
Housing Stabilization - <i>Includes Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services/ Housing Counseling/ Etc.</i>		High	50 households
<u>Priority Need: Addressing Homelessness</u>			
Service and Facility Operating Support - <i>Includes Outreach/ Shelter Managers / Case Managers/ Coordinated Entry/ Etc.</i>	X	High	1,500 people
Increase Shelter Beds/Units - <i>Includes Emergency / Transitional Shelter/ Permanent Supportive Housing/ Etc.</i>	X	High	15 beds
<u>Priority Need: Decent Affordable Housing (Owner and Renter)</u>			
Housing Rehabilitation	X	High	20 units
Housing Development	X	High	3 units
Housing Assistance		High	50 households



Next Steps

- **Public Comment**
 - **Ends April 15, 2021**
- **Incorporate written comments into the plan**
- **Submit to HUD 2021-2025 Consolidated Plan**

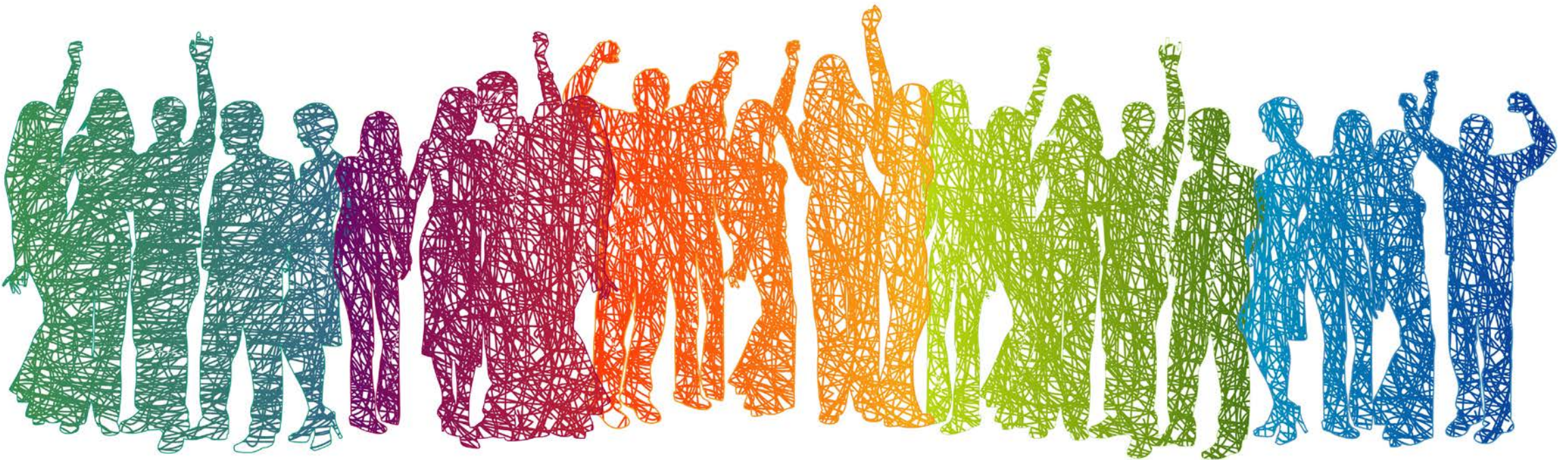




2021/2022 Annual Action Plan

City of Flagstaff Annual CDBG Cycle

- 8 external proposals received
- 1 applicant withdrew application
- 7 proposals ranked
- Total Requested \$897,773.17





Council Direction & Staff Responsibilities



Council CDBG Priorities

(established Dec 2020)

- Provide affordable housing (rental and ownership)
- Address Homelessness
- Support Neighborhood Revitalization
- Workforce Development

City Staff Responsibilities

- Conduct proposal process
- Determine activity eligibility
- Assess activity viability
- Conduct agency risk assessment
- Provide recommendations to the City Council



-

The City of Flagstaff is the Responsible Entity to the HUD



How much money are we talking about?



2021 Entitlement	\$571,367.00
<i>Program Income</i>	<i>\$278,216.00</i>
<i>Reallocated Funds</i>	<i>\$34,190.17</i>
Total Available for Allocation	\$883,773.17





How much money are we talking about for each category?



Admin/Grant Compliance and Indirect (20% cap)	\$125,000.00
<ul style="list-style-type: none"><i>Estimated</i> City Indirect at 10% of allocationAdmin/Grant Compliance	<div>\$55,051.00</div> <div>\$69,949.00</div>
Public Service (15% cap)	\$112,689.29
Housing Activities	\$649,435.67
Total Available	\$883,773.17





Public Service Proposals

(15% cap)



Agency	Proposal/Project	Request	Serving	Ranking
Homeless Youth Connection	Empowering Youth for the Future	\$30,000	70 youth experiencing homelessness	128
Native Americans for Community Action	Small Business Assistance	\$54,337.50	12 individuals/small businesses	127
Boys and Girls of Flagstaff	Afterschool and School Break Program	\$50,000	50 households with children	110
Tynkertopia	Community Based STEAM Education	\$100,000	Unknown, potentially 4,000 Sunnyside households	65
Southwest Fair Housing Council	Flagstaff Fair Housing Media Proposal	\$14,000	500 individuals	56

Total Request \$248,337.50



Housing Activity Proposals



<u>Agency</u>	<u>Proposal/Project</u>	<u>Request</u>	<u>Serving</u>	<u>Ranking</u>
Catholic Charities	Closing the Gap Facility Acquisition	\$300,000.00	8 chronically homeless individuals	153
Housing Solutions of Northern Arizona	Owner Occupied Housing Rehabilitation	\$257,896.00	12 households rehabilitated	142
Total Request		\$557,896.00		





Funding Recommendation

Public Service Proposals (15% cap)



<u>Agency</u>	<u>Proposal/Project</u>	<u>Request</u>	<u>Staff Recommendation</u>	<u>Serving</u>	<u>Ranking</u>
Homeless Youth Connection	Empowering Youth for the Future	\$30,000	\$30,000.00	70 youth experiencing homelessness	128
Native Americans for Community Action	Small Business Assistance	\$54,337.50	\$54,337.50	12 individuals/small businesses	127
Boys and Girls of Flagstaff	Afterschool and School Break Program	\$50,000	\$25,000.00	50 households with children	110
Tynkertopia	Community Based STEAM Education	\$100,000	\$0	Unknown, potentially approx. 4,000 Sunnyside households	65
Southwest Fair Housing Council	Flagstaff Fair Housing Media Proposal	\$14,000	\$0	500 individuals	56
		Total	\$109,337.50	Allowable	\$112,689.29



Funding Recommendation Housing Activities



<u>Agency</u>	<u>Proposal/Project</u>	<u>Request</u>	<u>Recommendation</u>	<u>Served</u>	<u>Ranking</u>
Catholic Charities	Closing the Gap Facility Acquisition	\$300,000.00	\$345,769.84	8 chronically homeless individuals	153
Housing Solutions of Northern Arizona	Owner Occupied Housing Rehabilitation	\$257,896.00	\$303,665.83	12 households rehabilitated	142
		Total	\$649,435.67		





Next Steps & Questions



CITY OF FLAGSTAFF
COMMUNITY DEVELOPMENT
BLOCK GRANT



- **Tonight - Council Input**
- **April 20, 2021 – Council Consideration of Resolutions**
- **Submit to HUD May 15, 2021**



2021/2022 CDBG Staff Allocation Recommendations



<u>Agency</u>	<u>Proposal/Project</u>	<u>Recommendation</u>	<u>Serving</u>
Catholic Charities	Closing the Gap Facility Acquisition	\$345,769.84	8 chronically homeless individuals
Housing Solutions of Northern Arizona	Owner Occupied Housing Rehabilitation	\$303,665.83	12 households rehabilitated
Homeless Youth Connection	Empowering Youth for the Future	\$30,000.00	70 youth experiencing homelessness
Native Americans for Community Action	Small Business Assistance	\$54,337.50	12 individuals/small businesses
Boys and Girls of Flagstaff	Afterschool and School Break Program	\$25,000.00	50 households with children
Total Housing and Public Service Activities		\$758,773.17	
Administration & Planning including Indirect (20% total)		\$125,000.00	
	Total Allocated	\$883,773.17	

Contact Information

Kristine Pavlik

Housing & Grants Administrator

City of Flagstaff

Kristine.Pavlik@flagstaffaz.gov
(928) 213-2749



CITY OF FLAGSTAFF

STAFF SUMMARY REPORT

To: The Honorable Mayor and Council
From: Kristine Pavlik, Housing and Grants Administrator
Date: 03/30/2021
Meeting Date: 04/20/2021



TITLE:

Consideration and Adoption of Resolution No. 2021- A resolution approving the City of Flagstaff's 2021/2025 Consolidated Plan and authorizing its submission to the U.S. Department of Housing and Urban Development (HUD).

Consideration and Adoption of Resolution No. 2021- A resolution approving the City of Flagstaff's 2021 Analysis of Impediments to Fair Housing Choice and authorizing its submission to the U.S. Department of Housing and Urban Development (HUD).

Consideration and Adoption of Resolution No. 2021- A resolution approving the City of Flagstaff's 2021/2022 Annual Action Plan and authorizing its submission to the U.S. Department of Housing and Urban Development (HUD).

STAFF RECOMMENDED ACTION:

- 1) Read Resolution Nos. 2021-, 2021- and 2021- by title only
- 2) City Clerk reads Resolution Nos. 2021-, 2021- and 2021- (if approved above)
- 3) Adopt Resolution Nos. 2021-, 2021- and 2021-

Executive Summary:

This staff summary is for the approval of three separate documents required by the US Department of Housing and Urban Development (HUD) as part of the Community Development Block Grant Program (CDBG). The 2021-2025 Consolidated Plan, 2021/2022 Annual Action Plan and the Analysis of Impediments to Fair Housing Choice are due to be submitted to HUD on May 15, 2021 and are required in order for the City of Flagstaff to maintain its compliance with federal CDBG regulations. Timely submission of these documents will enable the City to continue its annual entitlement allocation of CDBG funding.

Resolution No. 2021-

The PY(Program Year) 2021-2025 Consolidated Plan (Con Plan) is a 5-year strategic plan and assessment of community needs. This plan will function as a community guiding document to help achieve HUD's primary objective and national objectives.

Resolution No. 2021-

The Analysis of Impediments to Fair Housing Choice (AI) reviews current information and data available from a number of sources, identifies current impediments to fair housing in the City of Flagstaff, evaluates the efficacy of the 2016 Fair Housing Plan of Action and develops an updated plan that takes appropriate steps to overcome the effects of any impediments identified, efforts by the City further fair housing choice and maintains records reflecting the actions taken.

Resolution No. 2021-

The PY 2021/2022 Annual Action Plan (AAP) identifies how the anticipated 2021 CDBG allocation will address Flagstaff's community needs identified in the 2021-2025 Consolidated Plan and how funding will be distributed within Flagstaff city limits.

All documents are due to HUD on May 15th, 2021. The City of Flagstaff Housing Section has received notice of its 2021 allocation from the Department of Housing and Urban Development and it is outlined in detail below.

Financial Impact:

Approval of the above resolutions is critical to the City of Flagstaff receiving its annual CDBG entitlement allocation. The 2021/2022 CDBG allocation is \$571,367, a decrease of \$39,928 from the last program year. In addition, the City of Flagstaff is able to include program income and reallocated funds from previous years to increase the funds available for allocation. Total program income and reallocated funds equals \$312,406.17 for a grand total of \$883,773.17 available for the 2021/2022 program year, through the Annual Action Plan process.

The proposed allocation takes into consideration the City's financial impacts by including the estimated indirect rate of 10% in addition to 10% for administration and planning.

Policy Impact:

The City of Flagstaff Council's CDBG Priorities:

- Provide affordable housing (rental and ownership)
- Address homelessness
- Support neighborhood revitalization
- Workforce development (including job training and lifespan education)

Connection to PBB Key Community Priorities/Objectives & Regional Plan:

Priority Based Budgeting

- **High Performing Governance**
 - Encourage public trust through transparency, accessibility & use of the City's public participation policy
 - Implement innovative local government programs, new ideas & best practices; be recognized as a model for others to follow
- **Safe & Healthy Community**
 - Support social services, community partners & housing opportunities
 - Provide alternative responses, resources & programs, inclusive of mental health & other services
- **Inclusive & Engaged Community**
 - Foster community pride & civic engagement by increasing opportunities for public involvement, in line with best practices & legal requirements
 - Advance social equity & social justice in Flagstaff by supporting social services
 - Facilitate & foster diversity & inclusivity, including support of anti-racist policies & practices
 - Enhance community involvement, education & regional partnerships to strengthen the level of public trust
 - Ensure city facilities, services, & programs are accessible for all residents & representative of Flagstaff's diverse community
- **Sustainable, Innovative Infrastructure**

- Support the community's social infrastructure needs; assist those partner organizations that provide services the City does not
- **Robust Resilient Economy**
 - Support & strengthen a more robust, diverse, & sustainable economy in ways that reflect community values & provides for affordable housing opportunities
 - Enhance understanding between the development community, the City & Flagstaff residents
 - Enhance the community's workforce development programs & improve partnerships with higher education institutions & the private & public sectors
- **Livable Community**
 - Support regional partners which provide equitable & inclusive educational opportunities for Flagstaff residents of all ages
 - Actively support attainable & affordable housing through City projects & opportunities with developers
- **Environmental Stewardship**
 - Implement, maintain & further the Climate Action & Adaptation Plan (CAAP) with awareness of social inequities

Regional Plan

- **Goal NH.1. Foster and maintain healthy and diverse urban, suburban, and rural neighborhoods in the Flagstaff region.**
 - Policy NH.1.1. Preserve and enhance existing neighborhoods.
- **Goal NH.3. Make available a variety of housing types at different price points, to provide housing opportunities for all economic sectors.**
 - Policy NH.3.1. Provide a variety of housing types throughout the City and region, including purchase and rental options, to expand the choices available to meet the financial and lifestyle needs of our diverse population.
 - Policy NH.3.3. Increase the availability of affordable housing for very low-income persons, through innovative and effective funding mechanisms
- **Goal NH.4. All housing is safe and sanitary.**
 - Policy NH.4.1. Expand the availability of affordable housing throughout the region by preserving existing housing, including housing for very low-income persons. Policy NH.4.2. Reduce substandard housing units by conserving and rehabilitating existing housing stock to minimize impacts on existing residents.
 - Policy NH.4.3. Address accessibility issues and other housing barriers to persons with disabilities or special needs.
 - Policy NH.4.4. Encourage green practices in housing construction and rehabilitation that support durable, healthy, and energy efficient homes.
 - Policy NH.4.5. Renovate the existing housing stock to conserve energy and reduce utility and maintenance costs for owners and occupants.
 - Policy NH.4.6. Consider and integrate public transportation when possible in planning housing developments, to help reduce a household's transportation costs and minimize impact on the community's roads and transportation system.
 - Policy NH.4.7. Enforce compliance with fair housing laws.
- **Goal NH.5. Eliminate homelessness.**
 - Policy NH.5.1. Provide adequate resources for families with children experiencing homelessness.
 - Policy NH.5.2. Provide adequate resources for individuals experiencing homelessness.
 - Policy NH.5.3. Support and expand programs that prevent homelessness.
 - Policy NH.5.4. Make transitional housing resources available to populations experiencing homelessness.

Has There Been Previous Council Decision on This:

Staff received Council direction on Council CDBG priorities during the December 22nd, 2020 Council meeting which are identified in Policy Impact above and Background/History below.

Options and Alternatives:

- A) Approve Resolution Nos. 2021-, 2021- and 2021- and authorize the submission of the Con Plan, AI, and the AAP to HUD.
- B) Modify one or all Resolution Nos. 2021-, 2021- and 2021- and authorize the submission to HUD.
- C) Not approve Resolution Nos. 2021-, 2021- and 2021- and risk losing future CDBG allocations.

Background/History:

In order to receive CDBG funding, the City must complete and submit to HUD three required documents by May 15, 2021.

1. The Consolidated Plan (Con Plan) (Resolution No. 2021-) is due to HUD every five years. With Council's approval, the City's Con Plan will provide the framework for the use of Community Development Block Grant (CDBG) funding beginning July 1, 2021 and ending June 30, 2025. The Con Plan was created with extensive community outreach and involvement and includes community identified goals for the next five years.
2. The Analysis of Impediments to Fair Housing Choice (AI) (Resolution No. 2021--) is an analysis of Flagstaff's fair housing conditions and outlines appropriate actions/goals to overcome any impediments identified while maintaining records reflecting the actions taken to further fair housing choice in Flagstaff. As an entitlement community, the City of Flagstaff must annually certify that it will affirmatively further fair housing.
3. Lastly, the City must complete an Annual Action Plan (AAP) (Resolution No. 2021-). This plan describes how CDBG funds will be used in the coming year and how the annual allocation will be used to meet community needs identified in the Con Plan.

Every two years, staff requests guidance from Council on CDBG Priorities and the overall CDBG process for the coming two years. On December 22, 2020 Council received an overview of the CDBG program and established four priorities:

- Provide affordable housing (rental and ownership)
- Address homelessness
- Support neighborhood revitalization
- Workforce development (including job training and lifespan education)

Per the Department of Housing and Urban Development guidance, the City of Flagstaff's CDBG allocation for the 2021/22 Program Year is \$571,367. The City also has program income and de-obligated funds available for allocation in the amount of \$312,406.17 for a total available of \$883,773.17.

During the 2021 CDBG process, the City of Flagstaff Housing Section received 8 external Community Development Block Grant proposals for the 2021 Program Year. One applicant withdrew their application leaving 7 proposals for ranking. The total requested in CDBG funding from all proposals was \$897,773.17 with a total of \$883,773.17 available to allocate for the 2021/2022 Program Year.

Housing staff are responsible for determining whether a proposed activity is eligible, conducting a risk assessment of the project as well as the applying agency. Federal funds require administrative knowledge and capacity to ensure compliant and timely expenditure of funds. Additionally, a Ranking Committee comprised of three community representatives and three City staff met to review the external proposals and rank them by consensus. Rankings primarily serve as a risk and benefit assessment and are the guiding input for staff recommendations forwarded to City Council.

Below is a list of the proposals in ranking order. The proposals are divided between Housing and Public Service categories as HUD requires two separate funding limits and different criteria. A comprehensive

Proposal Book that includes each of the below proposals was distributed to Council on March 30, 2021.

Housing Activities	Proposal/ Project	Request	Ranking
Catholic Charities of Northern Arizona	Closing the Gap Facility Acquisition	\$300,000.00	153
Housing Solutions of Northern Arizona	Owner Occupied Housing Rehabilitation	\$257,896.00	142

Public Service Activities	Proposal/ Project	Request	Ranking
Homeless Youth Connection	Empowering Youth for the Future	\$30,000.00	128
Native Americans for Community Action	Small Business Assistance	\$54,337.50	142
Boys and Girls Club of Flagstaff	Afterschool and School Break Programs	\$50,000.00	110
Tynkertopia	Community Based STEAM Education	\$300,000.00	65
Southwest Fair Housing Council	Flagstaff Fair Housing Media Campaign	\$14,000.00	56

Key Considerations:

In order to receive CDBG funding, the City must complete a Con Plan every five years. In addition to the 5-year Con Plan, the City must complete an AAP that describes how CDBG funds will be used in the coming year and how the activities will accomplish the goals outlined in the 2021-2025 Con Plan. As part of the 5-year Con Plan and AAP, the City certifies it will affirmatively further fair housing. As part of this certification, the City completes an AI, takes appropriate actions to overcome the effects of any impediments identified through the analysis, and maintains records reflecting the actions taken.

Resolution No 2021- - Consolidated Plan (Con Plan)

The creation of the Consolidated Plan is an extensive process involving public and stakeholder input (gathered through surveys, public meetings, and a 45 day public comment period), community needs assessments and a housing market analysis. The data outlined in the Con Plan helps determine the relative priority of activities and the populations that will be served in the coming years with federal funds. HUD allows two priority designations – high and low. Assignment of priority does not reflect a lack of need for any particular population or activity; it merely identifies those conditions that are most likely to be addressed with limited CDBG funding.

- High (H) priority activities are likely to be funded with CDBG resources during the next five years.
- Low (L) priority activities may be funded as opportunities arise.
- Special Populations are certain clientele that are presumed by HUD to be low/moderate income and are defined as senior citizens, severely disabled adults, persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers.

The table below summarizes the 5 Year Con Plan Goals outlining associated CDBG activities, the priority level and 5-year numeric goals for each. Activities that will be targeted to special populations are also indicated. The table is designed to meet HUD requirements.

5 Year Consolidated Plan Goals			
Activities	Special Population	Priority Level	5 Year Goal
<u>Priority Need:</u> Neighborhood Revitalization, Public Facilities & Infrastructure			
Neighborhood Facility and Infrastructure Improvements <i>Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.</i>		High	3,000 people
Public Facilities <i>Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.</i>	X	High	100 people
Acquisition for Affordable Housing Development <i>Land/ Real Property/ Etc.</i>		Low	3 units
<u>Priority Need:</u> Public Services & Economic Opportunities			
Services to Meet Basic Needs <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>	X	High	300 people
Workforce Development <i>Includes Employment/ Job Training/ Business mentorship/ support/ assistance</i>	X	Low	15 people
Housing Stabilization <i>Includes Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services/ Housing Counseling/ Etc.</i>		High	50 households
<u>Priority Need:</u> Addressing Homelessness			
Service and Facility Operating Support <i>Includes Outreach/ Shelter Managers / Case Managers/ Coordinated Entry/ Etc.</i>	X	High	1,500 people
Increase Shelter Beds/Units <i>Includes Emergency / Transitional Shelter/ Permanent Supportive Housing/ Etc.</i>		High	15 beds/units
<u>Priority Need:</u> Decent Affordable Housing			

Housing Rehabilitation <i>Includes Owner and Renter Housing</i>	X	High	20 housing units
Housing Development <i>Includes Owner and Renter Housing</i>		High	3 units
Housing Assistance <i>Includes Owner and Renter Housing</i>		High	50 households

Resolution No. 2021- Analysis of Impediments to Fair Housing Choice (AI)

Similar to the Con Plan, the AI is created utilizing substantial community involvement (stakeholder surveys, community member surveys, and a public comment process). The purpose of the AI is to identify legitimate fair housing problems (impediments) faced by people seeking housing in Flagstaff. The AI reviews current information and data available from a number of sources, identifies current impediments to fair housing in the City of Flagstaff, evaluates the efficacy of the 2016 Plan of Action and develops a new Plan of Action to address current impediments.

The City's goals for the 2021 AI include:

1. Increase affordable and accessible housing opportunities to provide for greater Housing Choice among low- and moderate income and/or disabled citizens. Provide community education regarding and incentivize the acceptance of Housing Choice Vouchers for landlords and property management organizations.
2. Create public awareness of fair housing laws and affordable housing advocacy. Promote equal opportunity and prevent unlawful discrimination by providing relevant training, reliable information, and targeted outreach to both Housing sector stakeholders and city residents especially those most at-risk for discrimination.
3. Advocate for local and regional policy changes that increase affordable housing development as well as development outside of minority and low income areas of concentration.

Resolution No. 2021- Annual Action Plan (AAP)

The 2021/2022 Annual Action Plan (AAP) identifies how the anticipated 2021 CDBG allocation will address Flagstaff's community needs identified in the 2021-2025 Consolidated Plan and how funding will be distributed with Flagstaff city limits.

In the 2021 CDBG process, the City of Flagstaff Housing Section received 8 external Community Development Block Grant proposals for the 2021 Program Year. 1 applicant withdrew their application leaving 7 proposals for ranking. The total requested in CDBG funding from all proposals was \$897,773.17 with a total of \$883,773.17 available to allocate for the 2021/2022 Program Year. Funding recommendations are made after an extensive risk assessment. Funds are allocated starting with the highest scoring proposal, until all funds are accounted for.

Below is the 2020/2021 CDBG funding available for allocation:

Total 2021 Entitlement Award	\$571,367.00
Program Income (PI) and reallocated funds	\$312,406.17
Total Available Funding for Allocation	\$883,773.17

Planning and Administration Funding Recommendation

Federal CDBG regulations do not allow more than 20% of funds to be spent on Planning and Administration activities; estimating program year program income at \$60,000, allowable administrative funding for Program Year 21/22 equals \$126,273.40.

Below are the 2021 funding recommendations for the Planning and Administration category:

Planning and Administration Activities (20% cap.)	
Grant Compliance and Administration	\$69,949.00
Estimated City Indirect at 10%	\$55,051.00
Total Planning and Administration	\$125,000.00

Public Service Funding Recommendation

Federal CDBG regulations do not allow more than 15% of funds to be spent on Public Service Activities; allowable public service funding for the 2021/2022 Program Year is \$112,689.29.

Below are the 2021/2022 funding recommendations for the Public Service Category:

Public Service Activities	Proposal/Project	Request	Staff Recommendation	Ranking
Homeless Youth Connection	Empowering Youth for the Future	\$30,000.00	\$30,000.00	128
Native Americans for Community Action	Small Business Assistance	\$54,337.50	\$54,337.50	127
Boys and Girls Club of Flagstaff	Afterschool and School Break Programs	\$50,000.00	\$25,000.00	110
Tynkertopia	Community Based STEAM Education	\$100,000.00	\$0	65
Southwest Fair Housing Council	Flagstaff Fair Housing Media Campaign	\$14,000.00	\$0	56
Total Public Service Allocations			\$109,337.50	

Housing Activity Funding Recommendation

After the above recommended allocations are accounted for, there is \$649,435.67 in CDBG funds available for Housing Activities. This is \$91,539.67 more than received in proposal requests.

Below are the 2021 funding recommendations for the Housing Category:

Housing Activities	Proposal/Project	Request	Staff Recommendation	Ranking
Catholic Charities of Northern Arizona	Closing the Gap Facility Aquisition	\$300,000.00	\$345,769.84	153
Housing Solutions of Northern Arizona	Owner Occupied Housing Rehabilitation (OOHR)	\$257,896.00	\$303,665.83	142
Total Housing		\$649,435.67		

The chart below details 2021/2022 CDBG funding and allocation recommendations:

2021/2022 CDBG Funding Allocation Recommendations		
Housing and Public Service Activities	Staff Recommended Funding	Individuals/ Households Served
Catholic Charities Closing the Gap Facility Purchase	\$345,769.84	8 chronically homeless/ smi/ individuals in the first year
Housing Solutions of Northern Arizona Owner Occupied Rehabilitation	\$303,665.83	8 LMI households
Homeless Youth Connection Empowering Youth for the Future	\$30,000.00	70 youth experiencing homelessness
Native Americans for Community Action Small Business Assistance	\$54,337.50	12 LMI small business owners
Boys and Girls Club of Flagstaff	\$25,000.00	50 LMI households with children
Total Project -Housing & Public Services- Allocation		\$758,773.17
Total Admin & Planning Allocation		\$125,000.00
Total City of Flagstaff 2021/2022 CDBG Allocation		\$883,773.17
Total Individuals/ Households Served PY2021/2022		58 households 90 individuals

Expanded Financial Considerations:

The City of Flagstaff's CDBG allocation for the 2021/22 Program Year is \$571,367, a decrease of \$39,928 from the last program year. In addition, the City of Flagstaff is able to include program income and reallocated funds from previous years to increase the funds available for allocation. Total program income and reallocated funds equals \$312,406.17 for a grand total of \$883,773.17 available for the 2021/2022 program year, through the Annual Action Plan process.

In order to meet the goals identified in the Con Plan, the City expects to receive between \$550,000 to \$620,000 in CDBG funding during *each* of the next five years.

The attached Resolution 2021- is reflective of the recommendations listed above. The 2021/2022 CDBG recommendations are based on a total of \$883,773.17 in available funding and the City of Flagstaff's estimated indirect rate for PY 2021/2022 of 10%.

The City's 2021/2022 entitlement allocation is \$571,367, a decrease of \$39,928 from the 2020/2021 Program Year. In addition to the annual allocation, there is \$278,216 available from prior year program income and \$34,190.17 in reallocated unspent funds for a total of \$883,773.17 available to allocate this PY. Program income is gathered through the repayment of loans from the Owner Occupied Housing Rehabilitation and Homebuyer Financial Assistance programs. Reallocated funds derive from de-obligation of funds and/or activities completing their scope of work with a remainder of unspent funding. The amount of program income available is an increase of \$229,230 from 2020/2021 due to an uncharacteristically high amount of program income last year. The increase in program income is likely due to favorable housing market conditions and low interest rates leading to many former clients of the above mentioned programs either selling their homes or refinancing their home loans thus making the deferred payment loans due for re-payment to the City of Flagstaff.

Federal CDBG regulations do not allow more than 15% of funds to be spent on public service activities; \$112,689.29. Similarly there is also a regulatory 20% limit on the amount of funds to be spent on administration and planning activities; \$126,273.40. Staff is recommending an allocation of \$109,337.50 for public service activities and \$125,000 for administration as it is safer to budget slightly below the required caps.

Of the \$125,000 administration allocation, \$69,949 will be used for grant compliance and administration and \$55,051.00 for the City's estimated indirect rate (estimated at 10%).

Community Benefits and Considerations:

Within the 2016-2020 Consolidated Plan and excluding administration, Flagstaff has leveraged \$2,094,651.19 in CDBG expenditures with \$7,939,690.71 in other, private, or public funds.

Flagstaff is proud of prior year CDBG accomplishments and continues to utilize viable resources to improve the quality of life in the community. In all, approximately 5,073 unique individuals and an additional 13 households were beneficiaries of CDBG funded services and projects during the 2019/2020 Program Year.

If funded, the above recommendations would serve an additional 90 individuals and 58 households in the 2021/2022 program year. The projects recommended for funding will aid the community by:

- preserving existing housing stock and providing LMI and/or disabled households with critically needed health, safety, and accessibility renovations while also creating the possibility for future CDBG program income; and
- providing afterschool and school break childcare scholarships to low- and moderate income families; and
- creating 8 premanent supportive housing units for chronically homeless individuals with case

- management, substance abuse counseling and other wraparound services; and
- employ a full time youth coach for 70 youth experiencing homeless in the Flagstaff Unified School District, helping them to meet their educational potential; and
- aid 12 individuals in their efforts to start or improve a small business, and enhance and develop their economic self sufficiency with an emphasis on serving low- and moderate income, Native American Artisans.

Community Involvement:

All three of the proposed documents involved extensive community involvement and collaboration ranging from public meetings and public comment periods to online surveys and stakeholder focus groups to a ranking focused committee. In 2020 and 2021 all meetings were conducted virtually due to health and safety concerns from the ongoing COVID-19 global pandemic.

Initial Public Outreach – September 1, 2020

- Presentation to the Coconino County Continuum of Care (CoC) asking for CoC member involvement in the CDBG five year strategic planning process.
- Discussion and request for Con Plan input regarding 1) community needs and 2) proposed goals, activities, and objectives.
- Request for responses to online surveys to secure input into community needs and priorities; as well as Fair Housing knowledge and community member fair housing experiences.

Priority Needs Focus Groups – December 2020

- Agencies and organizations represented include NACA, Coconino County, Health Choice Integrated Care, Unsheltered Relatives Task Force, Habitat for Humanity, Northern Arizona Healthcare, Flagstaff City Council, Northern Arizona Veterans Resource Center, and the Salvation Army.
- Presentation to discuss the CDBG five year strategic planning process and 4 identified priority needs.
- Discussion and request for Con Plan input regarding 1) community needs and 2) proposed goals, activities, and objectives.
- Request for responses to online surveys to secure input into community needs and priorities; as well as Fair Housing knowledge and community member fair housing experiences.
- Virtual focus groups were held on Teams and included:
 - **Revitalization, Public Facilities, and Infrastructure Focus Group**
 - December 7th – 2-3pm
 - **Public Services & Economic Opportunities Focus Group**
 - December 9th – 2-3pm
 - **Addressing Homelessness Focus Group**
 - December 14th – 2-3pm
 - **Decent Affordable Housing Focus Group**
 - December 16th – 2-3pm

Housing Commission Public Meeting - December 17th, 2020

- Presentation to discuss the CDBG five year strategic planning process and 4 identified priority needs.
- Discussion and request for Con Plan input regarding 1) community needs and 2) proposed goals, activities, and objectives.
- Request for responses to online surveys to secure input into community needs and priorities; as well as Fair Housing knowledge and community member fair housing experiences

City Council Work Session – December 22nd, 2020

- Council direction to establish City Council CDBG funding priorities for PY 2021s and 2022.

First Public Meeting – December 28th, 2020

- Display advertisement (January 26th & 27th, 2020 – AZ Daily Sun)
- Meeting to discuss the CDBG proposal process and the Annual Action Plan

Second Public Meeting February 26th, 2021

- Display advertisement (February 19th & 20th, 2021 – AZ Daily Sun)
- Meeting to review the submitted proposals and allowed public comment in preparation for making funding recommendations to City Council.
- Presentation and discussion of proposed 2021-2025 Con Plan identified priority needs and activity goals.

Open Grant Process

- NoFA (Notice of Funding Available) Released -December 28th, 2020
- Proposal due to the City of Flagstaff February 22nd, 2021
- Proposal Ranking Committee with Citizen Participation and Staff on March 11, 2021

Public Comment Period for Draft documents posted on City of Flagstaff Housing Section Website: Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan

- **Public Comment accepted March 1 – April 15, 2021**
- Display advertisement (January 26th & 27th, 2021 – AZ Daily Sun)
- Display advertisement (February 19th & 20th, 2021 – AZ Daily Sun)
- Available on City Housing Section webpage beginning March 1, 2021

Social Media Promotions

- Fair Housing Online Community Survey and Stakeholder Survey posted weekly on City of Flagstaff Housing Facebook
- Fair Housing Online Community Survey and Stakeholder Survey posted twice each on Flagstaff City Government Main Facebook
- Fair Housing Online Community Survey and Stakeholder Survey shared by City and County Public Officials, Community Leaders and Northern Arizona Association of Realtors
- All public meetings and hearings posted 1x on Housing Facebook 2 days prior

Public Hearings

- **City Council Work Session – April 13th, 2021**
 - Presentation and Discussion with City Council regarding 2021-2025 Consolidated Plan, Analysis of Impediments to Fair Housing Choice, 2021/2022 Annual Action Plan – requesting Council input and direction
 - Comments may be submitted by mail or email or citizens could provide public comment at the meeting
- **City Council Meeting – April 20th, 2021**
 - Consideration and Approval of Resolutions Nos. 2021-, 2021-and 2021- and authorizing the submission of the Consolidated Plan, Analysis of Impediments to Further Fair Housing Choice and Annual Action Plan to HUD.

Resolution 2021- - Consolidated Plan (Con Plan)

- The Housing Section met with the Coconino County Continuum of Care, which leads efforts to address homelessness for the Rural Continuum of Care managed by the Arizona Department of Housing.
- Two public consultation meetings and four focus groups took place to seek Con Plan input into 1) community needs and 2) proposed goals, activities, and objectives.

- An online survey was conducted to secure input into community needs and priorities; 24 responses were received.
- With efforts to attract a diverse group of social service agencies, emails were distributed to all members of Coconino County's Continuum of Care (300 members)

Resolution 2021-- Analysis of Impediments to Further Fair Housing (AI)

- During the months of October, November and December 2020, a resident survey was conducted with 84 respondents. In addition, a stakeholder survey was conducted with 45 respondents including housing sector professionals, community leaders, and social service agency staff. Both surveys focused on gathering information to help identify possible fair housing impediments and ways to address them.
- A virtual fair housing training in partnership with Southwest Fair Housing was held on Wednesday September 30th, 2020 regarding COVID-19 and fair housing law.

Resolution 2021-- Annual Action Plan (AAP)

- The AAP process had three public meetings, a ranking committee with citizens and city staff, and a public comment period for community involvement.
- With efforts to attract a diverse group of social service agencies, emails were distributed to all members of Coconino County's Continuum of Care (300 members). Additionally, agencies that had previously requested information and/or had been involved in the CDBG proposal process in prior years received personal invitations. The proposal format was provided at the first public meeting and placed on the City website with a submission deadline of February 22nd, 2021.

Expanded Options and Alternatives:

- A) Approve any or all of the Resolution Nos. 2021-, 2021-and 2021- and authorize the submission of the Consolidated Plan, Analysis of Impediments to Further Fair Housing Choice and Annual Action Plan to HUD.
- B) Modify any or all of the Resolution Nos. 2021-, 2021-and 2021-
- C) Not approve any or all of the Resolution Nos. 2021-, 2021-and 2021-.

Attachments: [2021 CDBG Proposal Book](#)
 [Resolution No 2021- Con Plan](#)
 [Resolution No 2021- Fair Housing](#)
 [Resolutions No 2021- AAP](#)
 [2021 Draft Annual Action Plan](#)
 [2021 Con Plan Executive Summary](#)
 [21 Fair Housing Analysis Executive Summary](#)
 [April 13 CDBG Presentation](#)



**CITY OF FLAGSTAFF
COMMUNITY DEVELOPMENT
BLOCK GRANT**

Mayor

Mayor Paul Deasy

Council

Vice-Mayor Becky Daggett
Councilmember Adam Shimoni
Councilmember Regina Salas

Councilmember Austin Aslan
Councilmember Miranda Sweet
Councilmember Jim McCarthy

City Manager

Greg Clifton

Community Development Director

Dan Folke

Housing Director

Sarah Darr

City of Flagstaff

211 E Birch Ave
Flagstaff, AZ 86004
www.flagstaffaz.gov

City of Flagstaff

Analysis of Impediments to Fair Housing

May 15, 2021

Submitted to the U.S. Department of
Housing and Urban Development



Consolidated Plan and Analysis of Impediments to Fair Housing Choice

Prepared for: City of Flagstaff Community Development Division
www.flagstaffaz.gov

Prepared by Kristine Pavlik, Housing and Grants Administrator
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ON REQUEST THIS DOCUMENT CAN BE MADE AVAILABLE IN ALTERNATE FORMATS

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DRAFT

Introduction and Executive Summary

Background

In addition to prohibiting discrimination in housing, the Fair Housing Act also promotes the creation of diverse, inclusive communities with equal access to community resources such as good schools, transportation and jobs, and healthy environments. To accomplish this goal, the Fair Housing Act explicitly requires that federal housing and community development programs affirmatively advance fair housing and expand opportunity, or “affirmatively further fair housing” (AFFH), regardless of race, color, religion, national origin, family status, disability, and gender.

The City of Flagstaff receives an annual entitlement allocation of Community Development Block Grant (CDBG) funding from the US Department of Housing and Urban Development. The amount of CDBG funding received by the City varies from year-to-year. In Program Year 2021-2022, the City received \$571,367. The purposes of CDBG funding are:

1. Providing Decent Housing,
2. Providing a Suitable Living Environment, and
3. Expanding Economic Opportunities.

In order to receive CDBG funding, the City must complete a Consolidated Plan every five years. The City’s Consolidated Plan for HUD Program Years 2021 – 2026 was recently completed. In addition to the 5-year Consolidated Plan, the City must complete an Annual Action Plan that describes how CDBG funds will be used in the coming year. As part of the 5-year Consolidated Plan and Annual Action Plans, the City certifies it will affirmatively further fair housing. As part of this certification, the City must complete an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the analysis, and maintain records reflecting the actions taken.

AI Purpose and Goals

The City of Flagstaff has consistently supported the concept of the provision of fair housing for its residents without regard to race, color, religion, sex, national origin, handicap, or familial status. The purpose of this AI is to identify legitimate fair housing problems (impediments) faced by people seeking housing in Flagstaff. The AI reviews current information and data available from a number of sources, identifies current impediments to fair housing in the City of Flagstaff, evaluates the efficacy of the 2016 Plan of Action and develops a new Plan of Action to address current impediments.

The City’s goals in developing this AI and implementing the Plan of Action include to:

1. Increase affordable and accessible housing opportunities to provide for greater Housing Choice among low- and moderate income and/or disabled citizens.
2. Create public awareness of fair housing laws and reporting processes and destigmatize housing choice voucher holders among housing sector stakeholders, populations at-risk for discrimination and the community as a whole.
3. Advocate for local and regional policy changes that increase affordable housing development and availability, with a focus on promoting development outside of minority and low income areas of concentration.

Methodology

Statistical Analysis

Multiple statistical analyses were conducted, drawing on data from the following sources:

- 2015-2019 US Census Bureau American Community Survey Data
- Census 2010 Census Tract Block Group level data for the City of Flagstaff
- Census 2010 City of Flagstaff and Coconino County Data
- Federal Financial Institutions Examination Council (FFIEC)
- Home Mortgage Disclosure Act (HMDA) Data
- HUD Fair Housing complaint data
- HUD CHAS data.

In addition to data and information from the US Census, HUD and FFEIC, the City collected information and data for this Analysis from the following sources:

- A survey of 84 Flagstaff area residents.
- Interviews with 25 individuals working in the housing and related industries in Flagstaff
- Reports, data, and studies conducted on the national level
- The City of Flagstaff Consolidated Plans for FY2016-2020 and FY2021-2025
- The City of Flagstaff HUD Consolidated Annual Performance Reports for FY2015 through FY2019; and
- The City of Flagstaff 2016 Analysis of Impediments to Fair Housing Choice.

Resident Survey

A resident survey was conducted during November and December 2020 in both English and Spanish. The survey was designed to identify possible events of housing discrimination, identify resident's understanding of fair housing laws and how to file a complaint, and glean ideas about what might be done to prevent housing discrimination. The survey was developed by the Southwest Fair Housing Council and shared with the City.

Industry Stakeholder Interviews

During November and December 2020, nearly 60 industry stakeholders were contacted to discuss fair housing in Flagstaff and 44 stakeholders agreed to participate in the interview. The goal of the interviews was to contact people with expert knowledge about housing or housing-related services, assess their awareness of fair housing compliance, and collect their thoughts on perceived impediments and barriers to fair housing choice in the City of Flagstaff. Individuals from a number of different fields were interviewed, including social service and housing providers and Realtors. The results of these interviews provide qualitative information and insights into local issues pertaining to fair housing.

Regulation, Policy and Ordinance Review

One component of the AI is the review of local regulations, policies and ordinances that potentially impact fair housing in the City.

Review of Documents and Studies

In addition to statistical analyses, the following documents were reviewed and incorporated into this Analysis of Impediments to Fair Housing Choice:

- US Department of Housing and Urban Development FY 2019-2020 Annual Report on Fair Housing (most recent available).
- Where You Live Matters 2020 Fair Housing Trends Report by The National Fair Housing Alliance.
- City of Flagstaff Regional Transportation and Land Use Plan; and
- City of Flagstaff Incentive Policy for Affordable Housing.

Fair Housing Complaints and Enforcement Review

Fair housing complaint data was compiled from the City of Flagstaff, Southwest Fair Housing Council, and the US Department of Housing and Urban Development Fair Housing and Equal Opportunity Office.

Public Comments and Hearings

The City of Flagstaff made the draft AI available for public review and comment from March 1, 2021 through April 15, 2021. On April 13, 2021, the Flagstaff City Council conducted a public hearing regarding the draft AI, and on April 20, 2021, the City Council took action to formally approve the AI for HUD submittal alongside the 2021-2025 CDBG Consolidated Plan and 2021/2022 Annual Action Plan.

Conclusions

Identified Impediments

HUD defines impediments to fair housing choice as:

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

The following impediments were identified in the City of Flagstaff:

1. **Community Education.** The number and nature of fair housing complaints in Flagstaff is low, yet the results of the community survey, public forum and community interviews indicate that there is a need for continued outreach and education. Outreach to both industry stakeholders and residents is needed to ensure a broad understanding of Fair Housing.
 - a. 42% of survey respondents are either not very informed or only somewhat informed about housing discrimination.
 - b. 33% of survey respondents do not know where to report a housing discrimination complaint.
 - c. While 54% of survey respondents indicated they believe housing discrimination is occurring or likely occurring in Flagstaff and 61% indicated they would report housing discrimination if they encountered it, there were only 13 complaints filed between 2016 and 2020.
1. **Minority and Low-income Areas of Concentration.** Concentrations of both minorities and low-income households exist in four Census Tracts.
 - LMI Concentration = at least 51% of population has income below 80% AMI.
 - Census Tracts 2, 3, 5, 8, 10, 12, and 15.
 - Minority Concentration = proportion of minorities at least 10% higher than the Citywide proportion.

- Census Tracts 3, 4, 5, 8 and 11.02.
 - Four Census Tracts that are both areas of low income and minority concentration.
 - Census Tract 3, 4, 5, and 8.
 - The City's minority population continues to grow.
 - In 2011, racial and ethnic minorities represented 27% of the population, up from 26% of the population in 2008 and 21% in 2000.
 - Northern Arizona University students represented 22% of the City's minority population in 2011, including 43% of the Black/African American population and 100% of the Pacific Islander population.
2. **Disability Accessibility.** Testing data from Southwest Fair Housing Council indicates that housing discrimination on the basis of disability is more likely to be supported. Complaint data from Southwest Fair Housing Council and the US Department of Housing and Urban Development indicate a higher volume of complaints based on disability.
- 11 of 13 fair housing complaints reported by HUD in Flagstaff were regarding disability.
 - 14 of 15 complaints reported by SWFHC were regarding disability.
 - Majority (14) were rental housing
3. **Housing Choice.** Affordability is an indirect aspect of housing discrimination. The Fair Housing survey indicated a lack of affordable housing leading to a lack of Housing Choice.
- While housing choice voucher usage is an option for low-income renters, the program has a long wait-list and many landlords are unwilling to accept vouchers due to existing societal stigmas.
 - Community survey results, especially among Flagstaff LMI residents, indicate a lack of affordable housing as well as a shortage of landlords and property management organizations willing to accept Housing Choice Vouchers limiting LMI resident's choice in housing.
 - Lack of affordable housing supply for large households, which disproportionately impacts minorities, low-income households, and families with large households
 - Lack of affordable housing supply, particularly for low-income special needs households and persons with disabilities.
 - Public policy barriers to the development of Affordable Housing throughout the City of Flagstaff, Arizona
 - "Not in My Backyard" Residents in some neighborhoods designate a new development (e.g. shelter, affordable housing, group home) or change in occupancy of an existing development as inappropriate or unwanted for their local area.

City of Flagstaff Fair Housing Action Plan FY 2021-2022

The Action Plan is a critical element of the AI as it describes the measurable activities that will be conducted by the City of Flagstaff to address the identified impediments. In summary, the City will take the following actions to address impediments:

1. Sponsor a variety of education opportunities for residents and stakeholders
2. Reach out to minority and other protected classes to encourage their participation in fair housing planning and education opportunities.
3. Provide training and undertake recruitment of landlords and property managers for Housing Choice Vouchers – Improve public and stakeholder impression of HCV clients

4. Sponsor no less than 3 Fair Housing trainings annually target both housing sector stakeholders and community residents with a focus on:
 - a. Disability accessibility
 - b. Rentals and the use of Criminal Records in housing
 - c. Extended protections under Sex/Gender
 - d. Emotional support animals
5. Prioritize funding for owner and renter occupied housing rehabilitation to provide disabled LMI accessibility adaptations with deferred loans and grants and incentivize rental occupied housing rehabilitation programs for landlords adapting units for accessibility
6. Develop a comprehensive Housing Plan for the City of Flagstaff including information on Fair Housing, Housing Choice, and efforts to increase affordable and accessible housing units
7. Update the City's Incentives for Affordable Housing to encourage developers to provide Affordable and Accessible Units in a variety of locations to decrease area concentration

Reference Documents

The following documents are referenced in this Analysis of Impediments to Fair Housing Choice or provide valuable information regarding fair housing and related laws:

- The Arizona Fair Housing Law is available on The Arizona Residential Landlord/Tenant Act is available on the Arizona Department of Housing website at <http://www.housing.az.gov/sites/default/files/documents>.
- The Arizona Tenant's Rights and Responsibilities Handbook is available on the City of Flagstaff website at <http://www.flagstaff.az.gov/DocumentCenter/View/42329>.

The Fair Housing Act and AFFH

HUD's "Affirmatively Furthering Fair Housing" (AFFH) regulation is designed to ensure that localities promote inclusive communities while developing plans to expend Community Development Block Grant (CDBG) and other federal housing funds.

The Fair Housing Act has two goals: to end housing discrimination and to promote diverse, inclusive communities. The second goal is referred to as Affirmatively Furthering Fair Housing (AFFH), requiring cities to commit to upholding values of fair access and equal opportunity.

The Affirmatively Furthering Fair Housing provision was part of the Fair Housing Act when it was passed by Congress in 1968. Through that provision, Congress directed HUD to make sure that neither the agency itself, nor the cities, counties, states and public housing agencies it funds, discriminate in their programs. Further, Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish. In recent years, HUD increased oversight of its grantees' fair housing compliance, and took steps to give them better tools to ensure they are connecting all of their residents to opportunity, regardless of race, color, religion, national origin, sex, family status or disability.

The Affirmatively Furthering Fair Housing Rule

On July 16, 2015, the US Department of Housing & Urban Development (HUD) issued a new regulation to implement the affirmatively furthering fair housing requirements of the Fair Housing Act. With this rule, HUD would provide its program participants (states, counties, municipalities, and public housing agencies) with more effective means to affirmatively further the purposes and policies of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968.

HUD received nearly 1,000 comments on the proposed rule including comments from national civil rights, fair housing, women's, disability, LGBT and consumer organizations and labor unions. Advocates, grantees, the GAO, and HUD itself had determined that the previous system was not an effective way to ensure that either HUD or its grantees were using their resources to expand housing choice and ensure that all neighborhoods are places of opportunity, thereby fulfilling their statutory obligations to affirmatively further fair housing.

In conjunction with the rule, HUD provided its grantees with a format to use for analyzing local and regional fair housing issues, known as the Assessment of Fair Housing Tool. HUD launched the rule with an Assessment Tool for Local Governments and also developed one for Public Housing Agencies. HUD also published a guidebook to help grantees through the process of conducting their required Assessments of Fair Housing (AFHs).

AFFH UPDATE: HUD EFFECTIVELY SUSPENDS AFFH REGULATION

On January 5, 2018, HUD effectively suspended implementation of the agency's 2015 Affirmatively Furthering Fair Housing regulation. It did this by delaying program participants' submission of the fair housing plans (known as Assessments of Fair Housing or AFHs) until after October 31, 2020. The submission of these fair housing plans is tied to the 5-year cycle under which program participants must submit their spending plans, (known as Consolidated Plans, or Con Plans).

HUD's action means that most program participants will not be required to submit a fair housing plan for HUD review until 2024 or 2025.

The Assessment of Fair Housing process has proven to be helpful to communities that have undergone the process. For example, performing a thorough analysis of local impediments to fair housing will allow for the discovery potential problems face by residents such as a serious eviction problem not adequately addressed because the city had not fully recognized the scope of the problem. This issue drives family instability. The lack of affordable housing can exacerbate this issue for the city. The AFH process can uncover issues like this and help the city formulate a plan that will help provide better assistance to residents.

As a CDBG grantee, the City of Flagstaff is required to certify its commitment to affirmatively further fair housing. The City of Flagstaff will continue to perform an Analysis of Impediments to Fair Housing to certify this commitment, identify impediments and create an action plan for addressing the discovered impediments.

Geography and History

Flagstaff lies near the southwestern edge of the Colorado Plateau, the western side of the largest contiguous Ponderosa Pine forest in the continental United States. Flagstaff is located just south of the San Francisco Peaks, the highest mountain range in Arizona and includes the highest point in Arizona – Humphrey's Peak at 12,633 feet. The area around Flagstaff is considered a high altitude semi-desert, however, ecosystems ranging from pinon-juniper studded plateaus, high desert, green alpine forest and barren tundra can all be found within a short drive of Flagstaff¹.

Flagstaff's early economy was based on the lumber, railroad and ranching industries. The first permanent settlement was in 1876, when Thomas F. McMillan built a cabin at the base of Mars Hill on the west side of town. The city grew rapidly, primarily attributable to its location along the east-west transcontinental railroad line. In the 1880s, the railroads purchased land in the west from the federal government, which was then sold to individuals to help finance the railroad projects². By 1886, Flagstaff was the largest city on the railroad line between Albuquerque, New Mexico and the west coast of the United States.

Route 66 was completed in 1926 and ran through Flagstaff. Flagstaff was incorporated as a City in 1928, and in

1929 the City's first motel, the Motel Du Beau, was built³. Flagstaff went on to become a popular tourist stop along Route 66. According to the Arizona Historical Society, Flagstaff was the quintessential World War II boom town and was never the same after Pearl Harbor⁴. Part of this big change was the creation of the Navajo Ordnance Depot in 1942. The depot was vital to the U.S. success in the Pacific Theater during World War II. Munitions from plants across the country were shipped by rail to the Bellemont depot and stored, pending shipment to the Pacific via Los Angeles or San Francisco.

Navajos, Hopis, and Austrians played a major role at this very unusual military base. More than one thousand Navajo and Hopi workers were employed to build and then run the munitions storage depot. With family members, the Native American population was well over three thousand when they moved into "Indian Village" on the northwestern corner of the base. The Flagstaff area population jumped from five thousand to twenty thousand in just a few months, with many living in the forest, in rented garages, and in cars close to the construction site. During World War II, about \$42 million passed through town, in one way or another...an enormous sum in the 1940's⁵. Not only were 250 Austrian prisoners of war held at the northern Arizona munitions depot, but over one thousand sailors and marines came to the Arizona State Teachers College campus (today Northern Arizona University) for officer training. Prior to the war, about a dozen buildings/homes were constructed each year in Flagstaff. World War II brought about 1,200 buildings/homes---one century worth of growth.

Walkable urban areas were primarily developed prior to the 1940's in the heart of Flagstaff. Such places developed in a pattern where a person could live with limited reliance on the automobile and were conducive to destination walking and cycling, characteristics that are still prevalent today. The heart of the Flagstaff urban area is largely supported through a network of interconnected, tree-lined streets, a diversity of housing choices, and a mix of appropriate commercial and residential uses in a compact form. These areas also support public transit due to their compact nature. The Flagstaff urban areas include the downtown, south of downtown, La Plaza Vieja, Flagstaff Townsite and adjacent historic neighborhoods. Most of Flagstaff's residents and visitors agree that these areas help to define the unique character and identity of Flagstaff.

During the 1990s, development in the region spread across the rural landscape. While the rural environs are desirable, this leapfrog development was an inefficient use of land and natural and financial resources within the Flagstaff area; it increased traffic congestion, and placed a strain on the ability of the City and Coconino County to provide needed services and facilities, such as transportation, police, and fire and emergency services.

At present, the Flagstaff area has a relatively finite amount of developable private land. Of the large vacant parcels located within the City limits, a majority are at the periphery. Projections for the ultimate population of Flagstaff and surrounding areas vary. Population projections for 2055 adopted by the Arizona Department of Economic Security in 1997 showed an anticipated City of Flagstaff population of 158,272. In 2018 projections were reduced to 107,646.

¹ www.flagstaffarizona.org/flag_climate.html

² Paradis, Thomas Wayne. "Theme Town: A Geography of Landscape and Community in Flagstaff, Arizona."

³ Paradis, pp. 244–245.

⁴ www.arizonahistoricalsociety.org/userfiles/pdf/news_events/camp_navajo_historic_tour2.pdf

⁵ www.arizonahistoricalsociety.org/userfiles/pdf/news_events/camp_navajo_historic_tour2.pdf

Socio-economic Profile

Flagstaff is a mountain city located at 7,000 feet in the highlands of north central Arizona. It is surrounded by the Coconino National Forest, which contains the largest contiguous stand of Ponderosa Pines in the world. Flagstaff occupies 65 square miles on a volcanic plateau at the base of Arizona's highest point, the San Francisco Peaks, at 12,633 feet. Flagstaff is considered a metropolitan area because its population is over 50,000; however, its identity is still rooted in its small town mountain heritage. Hunting, fishing, skiing, mountain biking and rock climbing are just a few of the outdoor activities that attract people to Flagstaff.

Flagstaff has long been a transportation hub. Located along an old wagon road to California, Flagstaff's development began after the railroad arrived in 1881. Today, Flagstaff is the economic hub of Northern Arizona, ideally situated at the junction of Interstates 40 and 17. The Phoenix metropolitan area is 140 miles to the south and Grand Canyon National Park is approximately 80 miles to the north.

Flagstaff's incorporated population is about 70,000, with an additional 20,000 living in nearby unincorporated communities, and a trade area of 240,700. There are roughly 49,000 people employed in Flagstaff.

Flagstaff is home to Northern Arizona University (NAU). The school specializes in a number of environmental areas including forest health and biology. NAU is the state's largest residential campus, with roughly 22,000 students enrolled. Flagstaff has nine public elementary schools, two middle schools, two high schools and many private and charter schools. The newly expanded Coconino Community College is located adjacent to the NAU campus.

Flagstaff is a governmental, educational, transportation, cultural and commercial center, with healthcare, education, and tourism as major sources of employment. The city is home to a number of scientific and high-tech research and development industries, including W.L. Gore, Machine Solutions, and Prent Thermoforming. The community also has two museums, numerous art galleries, a symphony orchestra, four recreation centers, an ice-skating rink and a major ski resort. Flagstaff has extensive medical facilities and resources, including a state-of-the-art trauma center at the Flagstaff Medical Center.

Coconino County and Flagstaff possess an abundance of natural, cultural and archaeological resources, fueling an active tourism economy. Primary among all attractions is the Grand Canyon, a widely recognized natural wonder that stimulates domestic and international visitation at a rate approaching four million persons per year.

The Flagstaff area has a relatively finite amount of developable private land. Of the large vacant parcels located within the City limits, a majority are at the periphery and can be considered potential "greenfield development" or developments that incorporate sustainable programs and technologies such as lifecycle housing, complete streets, parks and open spaces, integrated retail and office, energy efficient buildings, innovative rainwater and stormwater facilities, and sidewalks and trails. Densities are expected to increase slowly over the next forty years, with more housing, employment, and transportation options.

According to the Flagstaff Regional Plan 2030, projections for the ultimate population of Flagstaff and surrounding areas vary. Population projections adopted by the Arizona Department of Economic Security in 1997 showed an anticipated population of 158,272 in the year 2050, while 2006 projections were 96,418 and

more recent estimates are lower still. If large population growth occurs and accommodations have not been made, local housing and land costs will increase substantially, and newcomers may be forced to move to distant communities, creating sprawl and long commutes to work.

Population

Flagstaff's incorporated population is about 72,000, with an additional 20,000 living in nearby unincorporated communities, and a trade area of 240,700. There are roughly 49,000 people employed in Flagstaff.

According to the 2015/2019 ACS, the City of Flagstaff has been a place of in-migration for several decades, growing by nearly 10,400 people (20%) from 2000 to 2008, 1,253 people (2%) between 2008 and 2011. More recently the City of Flagstaff population increased by 11.5% between 2011 and 2019. Growth in the early 2000's was fueled primarily by investors acquiring second homes, low mortgage rates and liberal financing terms, and the retirement of baby boomers. A significant portion of growth since 2008 can be attributed to an increase in Northern Arizona University student enrollment.

TABLE 1 – POPULATION AND HOUSEHOLD TRENDS AND PROJECTIONS									
2000 (1)		2008 (2)		2011 (3)		2019 (4)		2030 Projected (5)	
Pop.	HH	Pop.	HH	Pop.	HH	Pop.	HH	Pop.	HH
53,137	19,355	63,505	22,860	64,758	22,360	72,402	22,360	83,746	28,916
(1) Census 2000; (2) 2006/2008 ACS; (3) 2007/2011 ACS; (4) 2015/2019 ACS (5) AZ Department of Water Resources									

The City's growing population will require an increased emphasis on housing choices in the future. The region's housing is influenced by:

- Limited supply of land for development;
- Approximately forty percent (40%) of Flagstaff's households are by definition low- to moderate-income (City FY 2016 - 2020 HUD Consolidated Plan);
- Consistent but modest rate of population growth;
- NAU's total enrollment has grown by 16.2 percent in the last five years (Fall 2013 – Fall 2018); and
- Housing needs for the elderly, multigenerational families and downsizing will increase over the next several decades as the Baby Boom generation moves into the retirement years.

Local growing population sectors include the elderly, students, single-parent households, and nonfamily households. These community members need a variety of housing options within proximity to jobs, schools, and services. NAU students currently make up approximately thirty percent (30 %) percent of the local population, and their continued demand for student housing impacts cost and availability of housing in the region, resulting in a higher demand for multi-family housing, or housing affordable for single-incomes or multiple low incomes.

Race and Ethnicity

According to the 2015/2019 ACS 78% of the City's population is White, compared with 73% in 2008 and 79% in 2000. The Native American population comprised 8% of the population in 2019, compared with 13% in 2015. The population identifying as another race, including 2 or more races is just 8%, compared with 12% in 2015. Among all races, 19% of the population is Hispanic or Latino, a 1% difference of the population in 2015.

The City of Flagstaff comprises 51% of the Coconino County population and, with the exception of the Native American population, includes 80% of racial and ethnic minorities in the County. 80% or more of the County's Black/African American and Asian population lives in Flagstaff, as does nearly 70% of the population of another race, including two races.

TABLE 2 – CITY OF FLAGSTAFF AND COCONINO COUNTY POPULATION RACE/ETHNICITY (2019)

	City of Flagstaff			Coconino County	
	No.	%	% of Coconino County	No.	%
Total	72,402		51%	141,274	
White	56,722	78%	63%	90,333	64%
Black or African American	1,442	2%	83%	1,742	1%
Asian	2,227	3%	81%	2,766	2%
Native American or Alaska Native	5,683	8%	15%	37,504	27%
Native Hawaiian/Pacific Islander	189	0%	80%	235	0%
Other Race (incl. 2 or more races)	6,139	8%	71%	8,694	6%
Hispanic or Latino	13,990	19%	70%	19,931	14%

Source: 2015/2019 ACS Note: A Hispanic or Latino person may be any race.

Northern Arizona University

Students attending Northern Arizona University (NAU) represent more than one quarter (27%) of City of Flagstaff residents and contribute to racial and ethnic diversity, particularly among, Pacific Islander/Asian and African American populations; NAU students represent 43% of the African American population and 20% of the Asian and Hispanic populations. Approximately 10,500 students live in NAU dormitories and apartments, and an estimated 60%, or 13,600 students occupy open- market rental units, many located in close proximity to the University. NAU's total enrollment has grown by 16.2 percent in the last five years (Fall 2013 – Fall 2018).

TABLE 3 - 2019 NAU STUDENT ENROLLMENT (FLAGSTAFF CAMPUS)

	Students	% of NAU Students	% City of Flagstaff	% Coconino County
Total	30,736		27%	13%
White	16,942	55%	25%	15%
Black or African American	1019	3%	43%	34%
Asian	669	2%	20%	16%
Native American or Alaska Native	878	3%	11%	2%
Pacific Islander	86	1%	100%	45%
Other Race	807	3%	8%	5%
Hispanic or Latino	2,422	14%	20%	14%

Sources: Northern Arizona University; 2015/2019 ACS

Age of the Population

According to the 2015/2019 ACS, nearly 40% of the City's population is between the ages of 15 and 24, compared to 24% of the Coconino County population and 14% of the Arizona population. This is primarily due to the presence of NAU. The proportion of Flagstaff's population age 65 and older is 6.6%, less than half the statewide percentage of 13.1%. Flagstaff's high elevation and cold weather climate make it less attractive as a retirement destination. The percentage of 18 to 24 and 24 to 34 individuals are significantly higher in Flagstaff than the county and state. This is due to the growing population of NAU students.

TABLE 4 - AGE OF THE POPULATION – CITY OF FLAGSTAFF, COCONINO COUNTY AND ARIZONA (2019)						
Age	Arizona		Coconino County		City of Flagstaff	
	No.	%	No.	%	No.	%
Under 15	1,359,113	18.67	23,271	16.22	22,038	2.12
15 to 17	277,617	3.81	4,303	3	1,594	2.12
18 to 24	694,529	9.54	19,997	21.46	24,471	32.61
25 to 34	1,001,594	13.76	19,997	13.94	10,560	14.07
35 to 44	898,533	12.34	15283	10.65	7,435	9.91
45 to 54	853081	11.72	14245	9.93	6,873	9.16
55 to 64	884091	12.15	16571	11.55	7093	9.45
65 or more	1,307,241	17.96	18,586	12.95	6,527	8.70
Total	7278717		143476		75,044	
Median Age	38.3		31.1		25.8	
Source: 2015/2019 ACS						

Household and Family Types

Among the estimated 5,188 families with children in Flagstaff, 76% are married couple families, 17.5% are single-mother families, and just 6% are single-father families. Single-mother families are more likely to include children under 18 than are married-couple or single-father families. Just 2.3% of families with children include unmarried parents.

TABLE 5 - HOUSEHOLDS BY FAMILY TYPE (2019)				
	Coconino County		City of Flagstaff	
Households	48993		23839	
Families	29111	59.4%	12432	52.1%
Married-couple Families	21964	75.4%	10077	81.1%
Children under 18	7532	34.3%	3967	31.9%
Co-habiting couple household	4257	14.6%	3014	24.2%
Children under 18	619	14.5%	68	2.3%
Male householder, no wife present	9974	34.3%	6491	52.2%
Children under 18	656	6.6%	326	5.0%
Female householder, no husband present	12798	44.0%	6027	48.5%
Children under 18	2234	17.5%	827	13.7%
Source: 2015/2019 ACS				

Far more families in Flagstaff are renters, 52.6% compared to the State average of 34.7%. Very few of the married and unmarried partners in Flagstaff are LGBTQ but the average tends to match the percentage averages of the State.

TABLE 6 – MISC. HOUSEHOLDS (2019)				
	City of Flagstaff		Arizona State	
Families	12432		1740704	
Married-couple Families	9236	74.29%	1272331	73.09%
Opposite Sex Spouse	9175	99.34%	1211397	95.21%
Same Sex Spouse	61	0.49%	12151	0.70%
Un-married couple Families	2017	16.22%	198263	11.39%
Opposite Sex unmarried Partner	1919	95.14%	176494	89.02%
Same Sex Unmarried Partner	98	4.86%	11011	5.55%
Families living in Owner-occupied Units		47.40%		65.30%
Families living in Renter-occupied units		52.60%		34.70%
Source: 2015/2019 ACS				

Household Type by Race/Ethnicity

Citywide, nearly 49% of households are family households and 52% are non-family households. African American (47.7%), Native American (70%) and Hispanic (68%) households are more likely to be family households. Single female headed families are most prevalent among Native American (31%) and African American family households (35%). Single male headed households are most common among Native American households at 10%. All Pacific Islander households are single people living alone; there are 40 Pacific Islander households in Flagstaff. Among other non-family households, nearly one-third (25.4%) of 2 or more race households are single people. Living together in non-family households is most prevalent among Pacific Islander (39%) and Asian (17%) non-family households.

TABLE 7 – FLAGSTAFF HOUSEHOLDS BY FAMILY TYPE AND RACE/ETHNICITY (2019)								
	Flagstaff	White	African American	Native American	Asian	Pacific Islander	2 or more races	Hispanic
Family Households	48.8%	50.2	47.7	69.9	44.5	14	50.2	68
Married Couple	39.3%	41.5%	7.3%	28.4%	38%	0%	38.5%	49.3%
Male alone	3.5%	3.8%	5.4%	10.2%	1%	0%	7.5%	8.2%
Female alone	6%	4.9%	35%	31.3%	18%	14%	16%	4.4%
Non-families	52	49.8	52.3	30.1	55.8	86%	49.8	50.7
Living Alone	29%	26.7%	42.7%	19.6%	26%	47%	25.4%	32.5%
Not living alone	22.1%	23%	9.6%	10.5%	17%	39%	38.8%	18.2%
Source: 2015/2019 ACS								

Population with Disabilities by Age

Compared to Coconino County (13.4%) and the State of Arizona (13.2%), residents of Flagstaff are more likely (14.2) to be a person with a disability, in most part due to the number of group homes available in Flagstaff to the disabled population that is not able to live independently. The proportion of adults age 18 to 64 with a disability, including an independent living disability is higher in Flagstaff than in Coconino County and the State of Arizona. In the past 5 year the percentage of individuals in Flagstaff with a disability has more than doubled.

TABLE 8 - NON-INSTITUTIONALIZED POPULATION WITH DISABILITY (2019)						
	Arizona		Coconino County		City of Flagstaff	
	No.	%	No.	%	No.	%
Population	7,165,904		142,729		65,157	
With a disability	946,481	13.2	19,204	13.4	9,308	14.2
Age 5 to 17	32,916	3.4	883	4.5	290	3.1
Age 18 to 64	112,465	12	8,505	44.2	4,775	51.2
Age 65 and older	106,834	11.8	10,870	56.6	2214	23.7
Source: 2015/2019 ACS						

Income by Family Size

Median family income is lower among six-person families (67%) and five-person families (86%) than in Coconino County (86% and 97% respectively) and the State of Arizona (95% and 103% respectively).

TABLE 9 - MEDIAN INCOME BY FAMILY SIZE (2019)						
	Arizona		Coconino County		City of Flagstaff	
All Families	\$74468		76601		\$ 89234	
2-person families	69,122	49.30%	79,206	49.30%	84,896	95.14%
3-person families	74,639	19.10%	67,028	17.90%	92,273	103.41%
4-person families	84,669	16.30%	84,712	17.40%	84,618	94.83%
5-person families	78,221	8.70%	69,544	9.00%	110,397	123.72%
6-person families	75,728	3.90%	73,051	3.70%	108,819	121.95%
7+ person families	89,229	2.70%	137,784	2.70%	153,786	172.34%
Source: 2015/2019 ACS						

Median Income by Household Type

The median family income in the City of Flagstaff is \$65,648, compared to the median household income of \$48,758 and median non-family household income of \$30,454. As households include single-people and unrelated individuals living together, household income is typically lower than family income. Among family households, married-couple families enjoy the highest median income, while single-female headed households have the lowest median income. Female householders living alone have the lowest median income of all household types.

TABLE 9 - MEDIAN HOUSEHOLD INCOME BY FAMILY TYPE (2019)						
	Arizona		Coconino County		Flagstaff	
All Households	\$ 50,752	% Arizona HH Income	58085	% Coconino HH Income	\$ 58,900	% Flagstaff HH Income
Family Households	74,468	120.00%	76,601	131.88%	89,234	151.50%
Own children < 18 yrs	70,158	113.06%	69,910	120.36%	87,596	148.72%
No own children < 18 yrs	76,202	122.80%	85,700	147.54%	92,766	157.50%
Married-couple families	87,708	141.34%	88,814	152.90%	95,828	162.70%
Female householder, no husband	42,001	67.68%	40,037	68.93%	50,703	86.08%
Male householder, no wife	53,183	85.70%	51,703	89.01%	105,506	179.13%

	40,198	64.78%	34,758	59.84%	35,792	60.77%
Non-family households	36,234	58.39%	28,367	48.84%	29,744	50.50%
Female householder	31,218	50.31%	25,474	43.86%	26,100	44.31%
Living alone	68,463	110.33%	35,940	61.87%	35,551	60.36%
Not living alone	44,150	71.15%	37,402	64.39%	36,692	62.30%
Male householder	37,255	60.04%	26,799	46.14%	26,898	45.67%
Living alone	71,291	114.88%	52,571	90.51%	49,926	84.76%
Not living alone	74,468	120.00%	76,601	131.88%	89,234	151.50%
Source: 2015/2019 ACS						

Median Income by Race/Ethnicity

Compared to the State of Arizona, minority households in Flagstaff experience a proportionately higher median income, yet the median income of minority households in Flagstaff varies. Flagstaff's White households enjoy the highest proportionate median income at 110%. Since 2011 Black/African American households decreased from 104% to 75%. Hispanic, Native American/Alaskan Native and Asian households have median incomes well below the City median income. Hispanic

TABLE 10 - INCOME BY RACE / ETHNICITY (2019)						
	Arizona		Coconino County		City of Flagstaff	
	Median Income	% of Median Income	Median Income	% of Median Income	Median Income	% of Median Income
All Households	\$ 50,752		58085		\$ 58,900	
White	63828	125.76%	68919	119%	64896	110.18%
Black or African American	41040	80.86%	43145	74%	44252	75.13%
Native American	39974	78.76%	42757	74%	37083	62.96%
Asian	78785	155.24%	42607	73%	41281	70.09%
Hispanic	95.86%	54664	94%	50530	85.79%	95.86%
Source: 2015/2019 ACS						

Income Category by Race/Ethnicity (2010)

According to the 2010 Census, minorities in the City of Flagstaff were disproportionately low-income when compared to White households.

*The ACS only provides income by race data for municipalities with a population over 75,000. The 2010 Census numbers for these metrics is the most current available at this time.

- **Extremely low-income (0% to 30% AMI)** – 31% of Asian, 25% of 2 or more Race, 26% of Black and 19% of Native American households were extremely low income compared to 16% of White households.
- **Low income (30.1% to 50% AMI)** – 100% of Pacific Islander (9 households), 15% of Asian and 12% of Hispanic households were low-income, compared to 9% of White households.
- **Low-to-moderate income (50.1% - 80% AMI)** – 27% of Native American and 20% of Hispanic households were low-to-moderate income, compared to 16% of White households.
- **Moderate-to-middle income (80.1% to 120%)** – 19% of Hispanic households were moderate to middle income, compared to 18% of White households.
- **Middle and higher income (120.1% or more)** – 45% of 2 or more Race households were middle and higher income, compared to 43% of White households.

TABLE 11 - INCOME CATEGORY BY RACE/ETHNICITY (2010)										
	Extremely Low Income		Low Income		Low to Moderate Income		Moderate to Middle Income		Middle and Higher Income	
Race/Ethnicity	No.	%	No.	%	No.	%	No.	%	No.	%
Flagstaff	3,964	16%	2,268	9%	3,789	16%	4,277	18%	9,770	41%
White	2,858	16%	1,679	9%	2,521	14%	3,258	18%	7,684	43%
Black	61	20%	21	7%	50	16%	47	15%	132	42%
Native American	353	19%	110	6%	512	27%	317	17%	602	32%
Asian	169	31%	85	15%	68	12%	45	8%	187	34%
Pacific Islander	0	0%	9	100%	0	0%	0	0%	0	0%
2 or more Races	88	25%	13	4%	58	16%	39	11%	160	45%
Hispanic	435	15%	351	12%	580	20%	571	19%	1,005	34%
Source: 2010 Census										

Poverty by Race/Ethnicity

According to the 2015/2019 ACS, 17.5% of the Flagstaff population lives below the poverty level. Native American, and Hispanic populations experience a higher poverty rate than the white population (16.7%).

TABLE 12 - POPULATION IN POVERTY BY RACE/ETHNICITY (2019)		
	Below Poverty Level	
Race/Ethnicity	No.	%
City of Flagstaff	10,396	17.5%
White	7,829	16.70%
Black	202	26.30%
Native American	1,054	20.50%
Asian	469	26.00%
Pacific Islander	47	36.20%
Other Race	230	13.20%
Hispanic	2316	20.10%
Source: 2015/2019 ACS		

Poverty by Family Type

TABLE 13 - POVERTY BY FAMILY TYPE (2019)		
All families	720	5.8%
Married couple Family	238	2.6%
with children < 18	151	1.2%
Female householder, no husband present	377	16.9%
with children < 18	277	2.2%
Source: 2015/2019 ACS		

The overall rate of poverty among families in the City of Flagstaff is 5.8%. Single female householders with children under age 18 experience poverty at six times the rate of all families and six times the rate of married-couple families. Almost one-third of single-parent female headed families live below the poverty level.

Persons with Disabilities and Poverty

The City of Flagstaff's population with disabilities experiences a rate of poverty more than double the population without disabilities – 51.2% compared to 24.5% for the overall population - 1,932 people with disabilities in Flagstaff live below the poverty level.

The Workforce and Employment

From 2017 to 2018, employment in Flagstaff, AZ grew at a rate of 1.46%, from 36.5k employees to 37.1k employees.

The most common employment sectors for those who live in Flagstaff, AZ, are Educational Services (6,584 people), Accommodation & Food Services (5,974 people), and Retail Trade (4,554 people). This chart shows the share breakdown of the primary industries for residents of Flagstaff, AZ, though some of these residents may live in Flagstaff, AZ and work somewhere else. Census data is tagged to a residential address, not a work address.

In 2018, 56.7% of the workforce was employed in four industries - 1) accommodation and food services, 2) retail trade, 3) educational services, and 4) health care and social assistance. Slightly more than half (53.8%) of employees are employed full-time. Considering only full-time employment the top four industries were 1) health care and social assistance, 2) retail trade, 3) educational services, and 4) manufacturing.

TABLE 14 - TOP 6 INDUSTRIES EMPLOYING THE FLAGSTAFF WORKFORCE IN 2018						
	Employment	% Total Employment	Median Annual Earnings	Full-time	% Full-time	Median Annual Full-time Earnings
All Industries	37,100		\$20,100	18,687	53.8%	\$38,772
Accommodation & food services	5974	16.1%	\$13,127	1,628	31.6%	\$17,524
Retail trade	4554	12.3%	\$12,157	2,490	48.8%	\$30,320
Educational services	6584	17.8%	\$20,786	2,286	45.0%	\$42,784
Health care and social assistance	4,408	11.9%	\$40,122	2,405	55.8%	\$41,758
Source: 2015/2019 ACS						

Housing Profile

The City of Flagstaff HUD 2021 – 2025 Consolidated Plan describes in detail housing conditions in the City of Flagstaff. This housing profile provides context for and focuses on housing conditions by income, race/ethnicity, disability status, familial status and geographic areas.

The housing market consists of homeowners and renters and the units they occupy. In addition to tenure and occupancy, the three primary elements of the housing market that impact supply and demand are:

1. Variety - the types of housing that are available.
2. Quality, - most often defined by age, unit value and whether the unit has complete plumbing or kitchen facilities.
3. Affordability - defined by the percentage of household income that must be spent for housing costs and whether that percentage consumes more than 30% of gross household income.

The Northern Arizona University main campus is located in Flagstaff and has a significant impact on housing availability. Student enrollment at Northern Arizona University Flagstaff campus in 2020 was 29,569, with 22,870 students enrolled full-time. Approximately 7,767 students lived in college dormitories or apartments situated on land owned by NAU, an estimated 18% (5,640) either lived with family or were enrolled in online/remote classes, and an estimated 9,733 students lived off campus. Assuming an average of 2.5 students per open-market rental unit an estimated 3,893 rental units were occupied by students. Students typically pay between \$800 and \$1000 per bedroom, far more than could be earned by renting units to families.

2011-2015 CHAS data when compared with 2007-2011 household income and tenure data suggests insufficient rental units affordable to households with income less than 30% AMI and insufficient owner units affordable to households with income 50% to 80% AMI.

College students living off-campus that are supported by their parents appear to be very low income and their presence tends to inflate the number of households with income less than 30% AMI and to inflate the number of cost burdened households. It is however important to ensure adequate rental housing is available for non student households with income less than 30% AMI.

There are insufficient units affordable to owners and potential purchasers with income 50% to 80% AMI. 67% of renter respondents to the 2020 Coconino County Community Health and Human Services Needs Assessment indicated they would like to own a home but insufficient down payment and availability in their price range were barriers to homeownership. There are also insufficient rental units affordable to renters with income less than 30% AMI.

Rents established by HUD for the HOME program, which finances rehabilitation and new construction and for the Section 8 program, which provides monthly rental subsidies to low-income renters do not vary significantly from the area median rent due to the high volume of one and two bedroom rental units in Flagstaff. Rehabilitated or new units targeted to very low income renters would have positive impacts on the availability of affordable housing.

Residential Development Trend

In general, the housing market moves roughly in line with the rest of the economy over the long term. During the economic and housing boom from 2000 to 2006, the City issued an annual average of 630 residential permits. With the economic downturn, residential permitting declined to an average of 233 units per year from 2008 through

2011. In recent years, 2018 to 2020, an annual average of 295 residential permits were issued primarily for single family detached homes.

Age of the Housing Stock

Housing units that are 30 years old or older are more likely than the newer housing stock to require rehabilitation or replacement, historic preservation, lead-based paint remediation, and energy efficiency improvements. 36% of the City's housing units or 8,106 units were built before 1980 and are more than 30 years old. Of units built before 1980, roughly equal numbers are owner and renter occupied; renters are slightly more likely to occupy units built before 1950.

HUD data indicates that 2,290 pre-1980 housing units are occupied by households with children – 60% by renters and 40% by owners. Childhood lead poisoning is a serious pediatric health problem and children ages six years and younger are particularly susceptible to lead poisoning. Research indicates that even a low level of lead in a child's blood can have harmful effects on physical and developmental health. The most common source of exposure is deteriorating lead-based paint and lead-contaminated dust found in the home, but other sources include pottery, jewelry, candy and makeup.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,895	37%	4,650	36%
Housing units built before 1980 with children present				

Table 1 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,740	26%	2,860	22%
1980-1999	3,880	37%	5,270	41%
1950-1979	3,305	31%	4,040	32%
Before 1950	590	6%	610	5%
Total	10,515	100%	12,780	100%

Table 2 – Year Unit Built

Tenure and Tenure by HUD Income Category

The homeownership rate in Flagstaff, AZ is 46.8%, which is lower than the national average of 63.9%. According to the US Census, the rate of homeownership in the City of Flagstaff increased from 48% in 2000 to 52% in 2008 and then decreased to 48% in 2011 and 46.8% in 2019. Homeownership decreases across all income levels except households with incomes 50-80% AMI occurred, with the largest decreases among higher income households. The relatively stable homeownership rate among households with incomes 50-80% AMI may be attributed to the likelihood that these households received homeownership education and counseling prior to home purchase.

Ownership increases with household income - 69% of households with incomes above 100% AMI own their home compared to 25% of households with incomes below 50% AMI.

Families with Income in the past 12 months below poverty level:	1,315	
Families in poverty, owner occupants:	335	25.48%
Families in poverty, renter occupants:	975	74.14%

Tenure by Race/Ethnicity

While the homeownership rate in the City of Flagstaff is lower than that of Coconino County and the State of Arizona, it is particularly low among Native American households – 3.2%. The highest homeownership rates are among White (90%) and Hispanic (14.4%) household.

TABLE 16 - TENURE BY HOUSEHOLDER RACE/ETHNICITY (2019)		
	Owner	Renter
White	90.0	74.5
Black	0.6	2.3
Native American	3.2	10.1
Asian	1.9	3.8
Other Race	2.8	2.8
Hispanic	14.4	17.2
Total	47%	53%
Source: 2015/2019 ACS		

Housing Problems of Owners by Race/Ethnicity (Coconino County)

The US Department of Housing and Urban Development provided housing problems data by race and ethnicity for the City's Consolidated Plan. HUD defines the four housing problems as: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) More than one person per room; and 4) Cost Burden greater than 30%. According to this data, cost burden is the most significant housing problem in Flagstaff and disproportionately impacts minority owners:

- Hispanic owners at all income levels are more likely than White owners to have housing problems.
- Lower income Black and Asian owners are more likely to have housing problems than lower income White owners, yet higher income Black and Asian owners are less likely to have housing problems than higher income White owners.
- Higher income Native American owners are more likely to have housing problems than White owners; yet lower income Native American owners are less likely to have housing problems than White owners.

TABLE 17 –OWNERS WITH HOUSING PROBLEMS BY income and RACE AND ETHNICITY (2015) owner					
Race/Ethnicity	≤30% AMI	30.1-50% AMI	50.1-80% AMI	80.1-95% AMI	95.1% AMI and above
Flagstaff, AZ	3225	2,185	2,385	925	NA
White	1805	1,300	1,715	715	NA
Black	60	90	4	4	NA
Asian	110	70	60	10	NA
Native American	340	305	270	55	NA
Pacific Islander	0	0	15	0	NA
Hispanic	750	405	265	150	NA
Other	n/a	2,185	2,385	925	NA
Source: HUD eCon Planning Suite data					

Housing Problems of Renters by Race/Ethnicity (Coconino County)

According to HUD CHAS data for Coconino County, housing problems also disproportionately impact minority renters:

- Lower income Hispanic renters are more likely than lower income White renters to have housing problems, with the exception of those with incomes 50.1 – 80% AMI.
- The lowest-income Black renters are more likely to have housing problems than the lowest income White renters; however Black renters with incomes above 30.1% AMI are less likely than White renters to have housing problems.

TABLE 18 –PERCENT OF RENTERS WITH HOUSING PROBLEMS BY RACE AND ETHNICITY (2015)							
Race/Ethnicity	≤30% AMI	30.1-50% AMI	50.1-80% AMI	80.1-95% AMI	95.1% AMI and above	All Renters	
						No.	%
Coconino County	95.6%	85.5%	70.3%	62.0%	8.2%	8,360	53.8%
White	96.2%	90.6%	77.9%	51.0%	8.3%	4,790	51.5%
Black	100%	53.8%	25.0%	n/a	n/a	125	52.1%
Asian	n/a	n/a	n/a	n/a	n/a	140	45.9%
Native American	92.2%	66.4%	45.8%	75.0%	14.6%	1,760	54.2%
Pacific Islander	n/a	n/a	n/a	n/a	n/a	0	n/a
Hispanic	100%	96.3%	73.7%	85.7%	2.5%	1,440	65.2%
Other	100%	n/a	n/a	66.7%	n/a	105	43.8%
Source: HUD CHAS Data for Coconino County							

Housing Problems by Race/Ethnicity (HUD Consolidated Plan data for Flagstaff)

When a population's proportion of housing need is at least 10% higher than the housing needs of the population as a whole, the City considers that population to have disproportionate need. Disproportionately greater housing needs occur at each HUD income category; however, disproportionate housing need is not consistent for any one racial or ethnic group. The relatively small number of households in some racial and ethnic categories combined with the large proportion of NAU students who are minorities may impact this assessment.

- Among households with incomes below 30% AMI, Black/African American households have disproportionately greater housing needs; 2% of the City's population is Black/African American and 43% of Black/African American people in Flagstaff are NAU students.
- Among households with incomes between 30% and 50% AMI, Asian households have disproportionately greater housing needs. 2% of the City's population is Asian.
- Among households with incomes between 50% and 80% AMI, Pacific Islander households have disproportionately greater housing needs. HUD data suggests a smaller Pacific Islander population than local data. There are 10 Pacific Islander households experiencing disproportionately greater need and local data suggests that all are NAU students.
- Among households with incomes between 80% and 100% AMI, Native American households have disproportionately greater housing needs.

TABLE 19 – PERCENT OF HOUSEHOLDS WITH HOUSING PROBLEMS BY RACE, ETHNICITY AND INCOME LEVEL				
	≤30% AMI	30.1-50% AMI	50.1-80% AMI	80.1-100% AMI
White	86%	84%	66%	39%
Black	100%	0%	46%	0%
Asian	91%	100%	33%	10%
Native American	96%	75%	61%	74%
Pacific Islander	n/a	n/a	100%	n/a
Hispanic	93%	86%	58%	55%
Source: HUD eCon Planning Suite data				

HUD also provides data regarding severe housing needs. When a population's proportion of severe housing need is at least 10% higher than the housing needs of the population as a whole, the City considers that population to have disproportionate need. Disproportionately greater severe housing needs occur at each HUD income category except 30% to 50% AMI. Disproportionately severe housing need is consistent among Hispanic households with incomes between 50% and 100% AMI. Disproportionately severe housing needs among Hispanic households may result from larger family sizes and multi-generational households that result in overcrowding and severe overcrowding as defined by HUD.

- Among households with incomes below 30% AMI, Black/African American households have disproportionately greater severe housing needs. 2% of the City's population is Black/African American and 43% of Black/African American people in Flagstaff are NAU students.
- Among households with incomes between 30% and 50% AMI, no households have disproportionately greater housing needs.
- Among households with incomes between 50% and 80% AMI, Hispanic households have disproportionately greater housing needs.
- Among households with incomes between 80% and 100% AMI, Native American and Hispanic households have disproportionately greater housing needs.

TABLE 20 – PERCENT OF HOUSEHOLDS WITH SEVERE HOUSING PROBLEMS BY RACE AND ETHNICITY AND INCOME LEVEL (2015)				
Race/Ethnicity	≤30% AMI	30.1-50% AMI	50.1-80% AMI	80.1-100% AMI
Citywide	85%	50%	17%	17%
White	83%	52%	16%	9%
Black	100%	0%	0%	0%
Asian	91%	0%	0%	10%
Native American	91%	34%	12%	55%
Pacific Islander	0%	n/a	0%	n/a
Hispanic	90%	58%	28%	34%
Source: HUD eCon Planning Suite data				

Housing cost burden is the most prevalent housing problem in Flagstaff as there are few units lacking complete plumbing and/or kitchen facilities and limited incidences of overcrowding. Unfortunately the data provided by HUD included a significant error; therefore, HUD CHAS data for Coconino County was used to identify whether housing cost burden disproportionately impacts minority households relative to White households. This data revealed housing cost burden is disproportionately high among Black/African American households with income < 30% AMI and Pacific Islander households with income 30% to 50% AMI; many of these households are student households.

Geographic Concentration Areas

Low-income Concentration Areas – Census Block Groups

In 2019, 47.1% of the City's households were low and moderate income. There are 26 Census Block Groups with a disproportionately high percentage of low and moderate income households. For the purposes of the AI, disproportionately high is defined as at least 10% higher than the City. City Target Neighborhoods are identified in the following table along with those areas with a high concentration of NAU students (NAU Block Groups).

Considering only Census Tracts there are 7 Census Tracts where low-income populations are concentrated – Census Tracts 2, 3, 5, 8, 10, 12 and 15.

TABLE 21 - LMI BLOCK GROUPS						
Census Tract	Block Group	Total Population	LMI Population	% LMI	NAU Block Group	Target Area Name
2	2	1,350	605	44.81%		
3	1	700	210	30.00%		
3	2	3,050	2,715	89.02%		Sunnyside
3	3	1,880	1,340	71.28%		Sunnyside
3	4	1,335	750	56.18%		Sunnyside
4	3	1,860	820	44.09%		
4	4	800	625	78.13%	X	
4	5	645	155	24.03%		
5	2	925	325	35.14%		
5	3	1,135	345	30.40%		
5	4	1,115	740	66.37%		
5	5	410	130	31.71%		
6	2	1,865	1,020	54.69%	X	
8	1	1,045	810	77.51%	X	Southside
8	2	2,555	2,290	89.63%	X	Southside
8	3		830	82.18%	X	Pine Knoll

		1,010				
9	1	575	160	27.83%		
9	3	2,020	1,390	68.81%		
10	1	400	280	70.00%	X	
10	2	585	550	94.02%	X	
10	3	1,475	860	58.31%	X	
11.02	3	930	785	84.41%	X	La Plaza Vieja
11.02	4	1,615	1,120	69.35%	X	
12	1	1,270	655	51.57%	X	
Source: HUD 2021 LMI Data based on 2011/2015 American Community Survey						

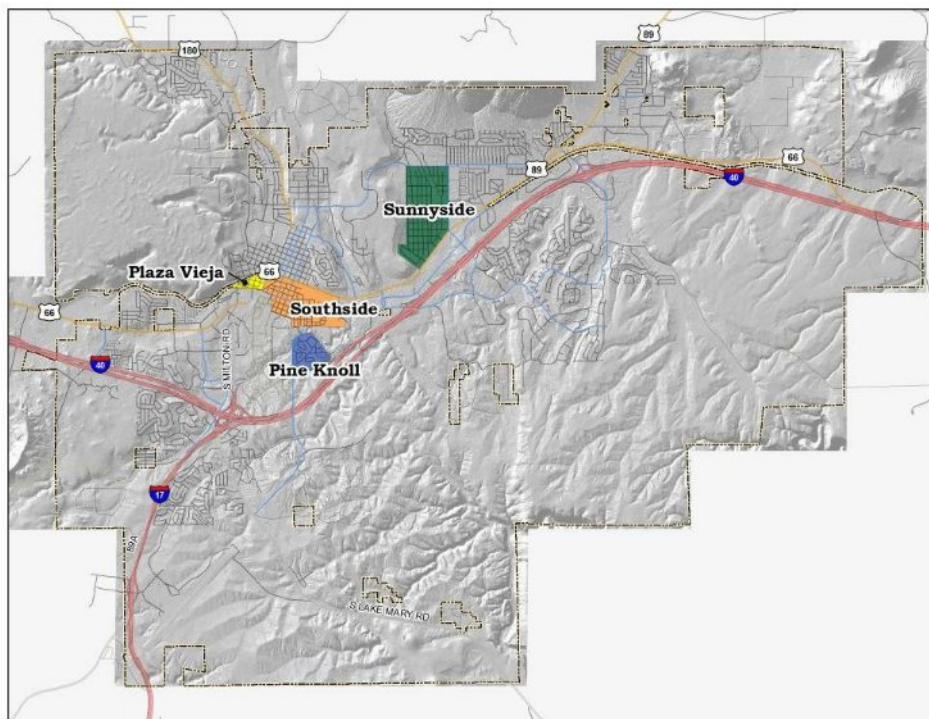
City of Flagstaff Target Neighborhoods

The City has identified four target neighborhoods:

- Sunnyside - Census Tract 3, Block Group 2, 3, & 4
- Southside - Census Tract 8, Block Group 1 & 2
- Pine Knoll - Census Tract 8, Block Group 3
- La Plaza Vieja - Census Tract 11.02, Block Group 3.

Together the people who live in the target neighborhoods have the following characteristics:

- 8,565 people reside in target neighborhoods – 6,210 are considered low and moderate income.
- 33% are Hispanic or Latino.
- 27% are minorities.
- 50% live in family households.
- 21% are headed by a householder 24 years old or younger.
- 24% own the home they occupy.



The Sunnyside Neighborhood Association, Southside Community Association and La Plaza Vieja Neighborhood Association work hard to improve neighborhoods with grass-roots efforts in safety improvements, beautification, job development, and community spirit. These resident-driven 501(c) 3 organizations also work collectively and advocate for continual and necessary infrastructure improvements in historic neighborhoods, growing more local jobs, increasing voter registration, and promoting unity among neighbors.

Minority Concentration Areas – 2010 Census Block Groups

There are 18 Census Block Groups in Flagstaff that are considered areas of minority concentration based on 2010 Census data. An area of minority concentration is defined as an area where the proportion of minorities (non-White) is at least 10% higher than the proportion of that minority group citywide. 10 of the Census block Groups include or are adjacent to Northern Arizona University (NAU). Areas with minority concentrations are shaded in the following table.

TABLE 23 - LMI AND MINORITY BLOCK GROUPS						
Census Tract	Block Group	Racial Concentration	Ethnic Concentration	NAU Block Group	LMI Concentration	Target Area Name
3	1	26.7%	23.8%		X	
3	2	58.5%	41.9%		X	Sunnyside
3	3	58.7%	37.3%		X	Sunnyside
3	4	54.3%	41.1%		X	Sunnyside
4	2	35.8%	23.2%			
4	3	36.1%	23.7%		X	
4	4	51.4%	26.1%	X	X	
4	5	26.4%	20.8%		X	
5	1	32.2%	21.0%			
5	2	32.0%	25.8%		X	
5	3	49.6%	32.4%		X	
5	4	34.5%	50.3%		X	
6	2	39.1%	13.8%	X	X	
7	1	30.3%	18.3%	X		
8	2	29.1%	16.1%	X	X	Southside
8	3	42.9%	26.0%	X	X	Pine Knoll
9	3	35.2%	17.0%			
11.02	1	36.1%	29.2%			La Plaza Vieja
11.02	3	32.1%	25.9%	X	X	
11.02	4	35.1%	26.4%	X	X	

Source: 2010 Census SF3

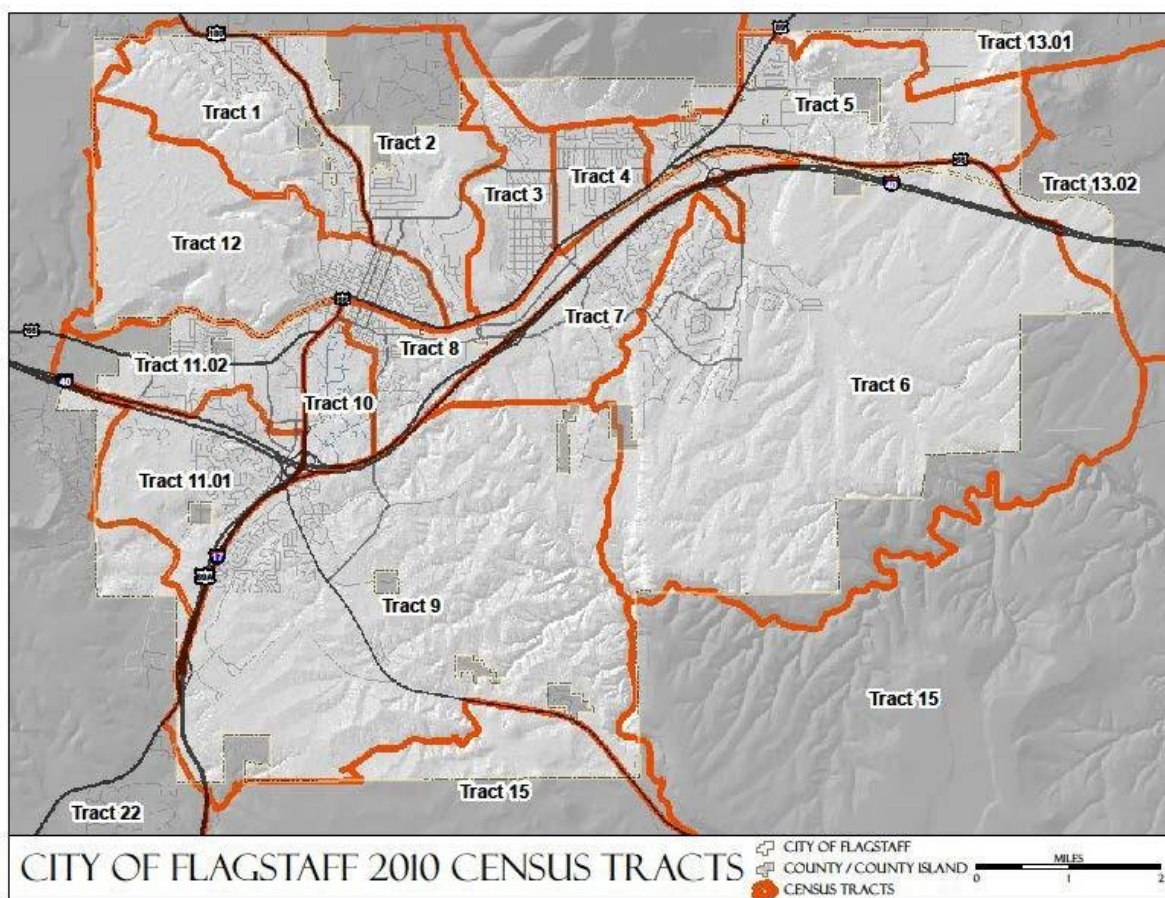
Citywide in 2010, 27% of the population was minority and 18% was Hispanic, compared to 21% minority and 16% Hispanic in 2000. Overall, the proportion of minorities increased 28.6% and the proportion of Hispanics increased 11.1%. There was one Census Tract (11.02) added to the City list of minority concentration areas as a result of new Census boundaries in 2010. Several Census Tracts experienced increases in minority populations at a higher rate than the increase in the citywide minority population:

- Census Tract 3 – The minority population increased 20% from 40% in 2000 to 52% in 2010.
- Census Tract 5 – The Hispanic population increased 30.4% from 23% in 2000 to 30% in 2010. Census Tract 5 is an NAU Census Tract.

Minority and LMI Concentration Areas – 2010 Census Tracts

There are four Census Tracts that are both areas of low income and minority concentration – Census Tract 3, Census Tract 4, Census Tract 5, and Census Tract 8.

TABLE 24 - LMI AND MINORITY CENSUS TRACTS							
Census Tract	Total Population	Racial Minority Population	% Racial Minority	Ethnic Minority Population	% Ethnic Minority	Minority Concentration	LMI Concentration
1	3,666	564	15.4%	531	14.5%	NO	NO
2	3,550	806	22.7%	482	13.6%	NO	NO
3	6,478	3,466	53.5%	3,217	49.7%	YES	YES
4	5,226	1,742	33.3%	1,021	19.5%	YES	YES
5	4,242	1,884	44.4%	1,113	26.2%	YES	YES
6	5,531	1,069	19.3%	289	5.2%	NO	NO
7	3,564	417	11.7%	530	14.9%	NO	NO
8	3,912	1,199	30.6%	523	13.4%	YES	YES
9	6,553	1,168	17.8%	1,025	15.6%	NO	NO
10	7,519	1,988	26.4%	652	8.7%	NO	YES
11.01	4,650	962	20.7%	529	11.4%	NO	NO
11.02	6,478	1,946	30.0%	1,539	23.8%	YES	NO
12	2,540	461	18.1%	265	10.4%	NO	YES
13.01	No data	No data					NO
13.02	No data	No data					NO
15	No data	No data					YES
22	No data	No data					NO
Source: 2010 Census							



Persons with Disabilities Concentration Areas

Data regarding persons with disabilities is available only at the Census Tract Level and from ACS 2008/2012. According to ACS 2008/2012, 7.7% of City of Flagstaff residents are persons with disabilities. Areas where the proportion of persons with disabilities is at least 10% higher than citywide are Census Tracts 2 and 4. Census Tract 4 is also an area of low income and minority concentration and Census Tract 2 includes a Low Income Housing Tax Credit project targeted for occupancy by people who are elderly or have disabilities.

TABLE 25 - POPULATION WITH DISABILITIES BY CENSUS TRACT (2012)			
Census Tract	No.	%.	Concentration
City of Flagstaff	4,665	7.7%	NO
Tract 1 (part)	313	7.9%	NO
Tract 2 (part)	328	9.5%	YES
Tract 3 (part)	498	7.5%	NO
Tract 4 (part)	603	11.3%	YES
Tract 5 (part)	391	8.1%	NO
Tract 6 (part)	274	5.1%	NO
Tract 7 (part)	162	4.6%	NO
Tract 8 (part)	251	7.0%	NO
Tract 9 (part)	350	5.4%	NO
Tract 10 (part)	606	7.3%	NO
Tract 11.01 (part)	304	6.2%	NO
Tract 11.02 (part)	385	6.3%	NO
Tract 12 (part)	200	7.6%	NO
Tract 13.01 (part)	0	0.0%	NO
Tract 13.02 (part)	0	0.0%	NO
Tract 15 (part)	0	0.0%	NO
Tract 22 (part)	0	0.0%	NO
Source: ACS 2008/2012			

Low-income Multifamily Housing Locations

There are 1,255 subsidized low-income rental units in the City of Flagstaff. In addition to the 265 public housing units and 101 affordable rental units owned and operated by the City of Flagstaff Public Housing Authority, there are 888 affordable rental units in 12 apartment complexes funded with the Low Income Housing Tax Credit Program. LIHTC units are generally targeted to households with income less than 60% of the area median income. LIHTC units may be targeted to specific populations, and 60 units are targeted to elderly and disabled households; the remaining 828 units are targeted to families. There are also 12 HUD-funded Section 202 units serving very-low income people with disabilities.

Two income-restricted developments are located in a Census Tract this is also an area of minority concentration. During the past five years no income restricted developments were added in areas of minority concentration. The majority of Low Income Housing Tax Credit projects are located in Census Tract 9, an area primarily south of Interstate 40 and the most recently-developed area of the City.

Private Sector - Home Mortgage Disclosure Act (HMDA) Data

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975 to provide the public with information that would assist in determining if financial institutions are serving the credit needs of their communities and to identify discriminatory housing activities. The law requires that certain financial institutions such as banks, savings associations, credit unions and other mortgage lending institutions collect and publicly disclose information on home loan applications and purchases. HMDA data provides an array of information on mortgage lending activity such as the type and disposition of loans, and borrower characteristics such as race, gender, and income.

HMDA data provides valuable insight into possible impediments to fair housing choice in the City of Flagstaff. Because HMDA data does not measure credit history, this analysis cannot conclude that higher rates of loan denial are explained solely by the credit of the borrowers, or solely based on race, ethnicity, sex or other protected classes. Instead, HMDA data can identify whether further investigation into discriminatory practices is needed.

In 2019, 1,121 home loan applications were made by Flagstaff residents and 92 or 7% were denied. 1,624 refinancing loan applications were also made, with a denial rate of 14%. The combined denial rate for the 2,745 home purchase and refinance loans were 15%, less than half the denial rate of 33.9% in 2008 when 3,044 applications were received.

The Consumer Financial Protection Bureau (CFPB)

The Consumer Financial Protection Bureau (CFPB) was established on July 21, 2010 under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act Public Law No. 111-203 (Dodd-Frank Act). The CFPB was established as an independent bureau within the Federal Reserve System. The Bureau is an Executive agency as defined in Section 105 of Title 5, United States Code. The Dodd-Frank Act authorizes the CFPB to exercise its authorities to ensure that, with respect to consumer financial products and services:

1. Consumers are provided with timely and understandable information to make responsible decisions about financial transactions;

2. Consumers are protected from unfair, deceptive, or abusive acts and practices and from discrimination;
3. Outdated, unnecessary, or unduly burdensome regulations are regularly identified and addressed in order to reduce unwarranted regulatory burdens;
4. Federal consumer financial law is enforced consistently in order to promote fair competition; and
5. Markets for consumer financial products and services operate transparently and efficiently to facilitate access and innovation.

To accomplish its mission, the CFPB is organized into six primary divisions:

1. Consumer Education and Engagement provides information to consumers to empower them to make financial decisions that are best for them.
2. Supervision, Enforcement and Fair Lending ensures compliance with Federal consumer financial laws by supervising market participants and bringing enforcement actions when appropriate.
3. Research, Markets and Regulations conducts research to understand consumer financial markets and consumer behavior, evaluates whether there is a need for regulation, and determines the costs and benefits of potential or existing regulations.
4. Legal Division ensures the Bureau's compliance with all applicable laws and provides advice to the Director and the Bureau's divisions.
5. External Affairs manages relationships with external stakeholders and ensures that the Bureau maintains robust dialogue with interested stakeholders to promote understanding, transparency, and accountability.
6. Operations builds and sustains operational infrastructure to support the entire organization and hears directly from consumers about challenges they face in the marketplaces through their complaints, questions, and feedback.

Home Purchase Loan Application Disposition by Race

In 2019, 93% of loan applications were made by White applicants. 75% of home purchase loan applications were originated. Among loans not originated, 20% were denied. Overall, loan applications resulting in an originated loan were highest among Hispanic applicants and lowest among Native American Applicants. Loan denial rates were highest among Native American applicants and lowest among White applicants.

Adjusting HMDA data for income may explain loan application disposition data – minorities and single-parent families often have lower incomes and challenging credit histories or no credit histories that may lead to higher rates of denial. In 2014, 76% of loan applications were from higher income applicants (income above 120% AMI), compared with 55% in 2008. In 2019, 16% of loan applications were from middle income households (income 80-120% AMI), and 8% from low and moderate income households (income less than 80% AMI). Origination rates were highest among low and moderate income households at 77% and lowest among middle-income households at 59%. The higher rate of origination among low and moderate income households suggests that housing education and counseling and perhaps home purchase assistance increased the rate of loan originations.

Except at higher income levels Native American home purchase loan applicants experience the highest rates of loan denial.

TABLE 27 - DISPOSITION OF HOME PURCHASE LOAN APPLICATIONS by RACE/ETHNICITY 2019			
Race/Ethnicity	Applications Received	Applications Denied	
		No.	%
Native American	98	22	22.45%
Asian	56	16	28.57%
Black/African American	18	6	33.33%
Native Hawaiian or Other Pacific Islander	7	7	100.00%
White	3428	708	20.65%
Hispanic	232	76	32.76%
Source: Consumer Financial Protection Bureau HMDA Query			

TABLE 28 - HOME PURCHASE LOAN APPLICATIONS AND DENIALS BY GENDER AND CO-APPLICANT STATUS OF APPLICANT			
	Applications	Denials	% Denied
Female Alone	721	182	25.24%
Male Alone	1180	353	29.92%
Joint	2209	369	16.70%
Source: Consumer Financial Protection Bureau HMDA Query			

Home Purchase Loan Application Disposition – Manufactured

Housing The rate of loan denials for manufactured housing purchases (56.1%) is 6.5 times the rate of loan denials for one to four family dwellings (8.6%). 41% of the loan denials for Native American home purchase loan applicants were for manufactured housing as were 20% of loan denials for Hispanic home purchase loan applicants. This data suggests that housing type plays a significant role in whether a home purchase loan will be originated.

TABLE 29 - LOAN APPLICATIONS AND DENIALS FOR MANUFACTURED HOUSING PURCHASE BY RACE			
	Applications	Denials	% Denied
Native American	39	16	41.03%
Asian	1	0	0.00%
Black/African American	3	0	0.00%
White	211	15	7.11%
Hispanic	31	6	19.35%
Source: Consumer Financial Protection Bureau HMDA Query			

Disposition of Refinancing Loan Applications in the City of Flagstaff (2019)

In 2019, nearly three quarters of refinancing loans were in Census Tracts that are neither low-income nor minority concentration tracts. 2019 HMDA data defining the disposition of refinancing loan applications by Census Tract revealed higher denial rates than citywide in five Census Tracts - 3, 8, 11.01, 11.02 and 15; the citywide rate was 21.5%. The combined rate of denial in Census Tracts that are neither LMI nor minority concentration tracts is 14.9% compared to 24.6% in LMI concentration tracts and 25.4% in minority concentration tracts. This data suggests that there is a higher correlation of refinancing loan denial in LMI and minority concentration tracts.

Refinancing Loan Application Denial by Race

In 2019, 20% of refinancing loan applications for which the applicant reported race were denied. The rate of loan denial was higher among non-White applicants (27.1%) than for White applicants (19.5%), suggesting that refinancing loan denials are more prevalent among minority borrowers than White borrowers.

Lower income households are more likely to experience a refinancing loan denial than are households at higher incomes. Considering race and ethnicity, Native American refinancing loan applications experience the highest rates of loan denial.

Unlike home purchase loans, the rate of refinancing loan denials for females is not higher than for males. The highest rates of refinancing loan denial are among all borrowers with income less than 80% of the area median income, suggesting that income and credit play a role in refinancing loan originations.

Local Loan Limits

FHA and conventional Loan limits vary based on the number of living-units on the property. FHA loans are only allowed on 1 to 4 living-unit properties. These 1 to 4 unit properties can be purchased with an FHA loan as long as the owner occupies one of the unit. Properties with over 4 units are considered commercial and do not qualify for FHA or conventional loans.

Limits for FHA Loans in Flagstaff, Arizona range from \$389,850 for 1 living-unit homes to \$749,700 for 4 living-units. Conventional Loan Limits in Flagstaff are \$548,250 for 1 living-unit homes to \$1,054,500 for 4 living-units. The 2021 Home Equity Conversion Mortgage (HECM) limits in Flagstaff is \$822,375. HECM limit does not depend on the size of the home.

Conventional loans (also called "conforming") are loans that conform to the requirements set by Fannie Mae and Freddie Mac. Fannie Mae and Freddie Mac buy home loans from lenders to provide liquidity.

Flagstaff has high cost limits to compensate for above average housing prices. Limits in Flagstaff are above the 2021 national floor.

Fair Housing Programs

Fair Housing Laws and Policies

The Fair Housing Act of 1968 (FHA) made it illegal to discriminate in housing because of a person's race, color, religion, or national origin. In 1970 gender was added as a protected class and in 1988, the Fair Housing Amendments Act added familial status and disability (referred to as Handicapped in FHA) to the list. The familial status provision protects households with children under 18 years of age. Disability covers physical and mental disabilities, including persons with HIV/AIDS or in recovery from substance abuse. Federal protection under FHA does not cover discrimination based on age, income, source of income or sexual orientation.

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

Agencies and Organizations

City of Flagstaff

Fair housing complainants who contact the City of Flagstaff are provided a packet of information that includes information regarding who to contact and how to file a complaint. The packet refers complainants to three possible sources for further assistance and processing – the Arizona Attorney General's Office, the US Department of Housing and Urban Development, and the Southwest Fair Housing Council. The packet describes the role of each agency and the process for filing a complaint. The Arizona Attorney General's Office is the Fair Housing Assistance Program that would directly process a formal complaint originating in Flagstaff. The SWFHC is the Fair Housing Initiatives Program that would investigate the complaint and then turn the complaint over to the US Department of Housing and Urban Development or the Attorney General's Office.

The City's Housing Specialist is the primary contact for fair housing questions and complaints. While there had historically been a low volume of calls (1 to 3 calls per year) and complaints, the City began logging the number of calls received regarding fair housing in 2015. The City also logs calls related to landlord-tenant issues. These logs reveal that most complaints are related to landlord-tenant issues.

TABLE 37 - FAIR HOUSING AND LANDLORD TENANT CALLS		
Year	Fair Housing Calls	Landlord-Tenant Calls
2015	0	4
2016	0	4
2017	0	16
2018	2	21
2019	8	15
2020	5	24
Total	15	84

Southwest Fair Housing Council

The Southwest Fair Housing Council (SWFHC) also takes calls from Flagstaff residents, including those who may elect to call SWFHC after contacting the City.

The Arizona Attorney General's Office

The Arizona Fair Housing Act is essentially the same as the Federal Fair Housing Act and is designated as "substantially equivalent." As a result, under the Federal Fair Housing Assistance Program (FHAP), the U.S. Department of Housing and Urban Development (HUD) contracts with the Arizona Attorney General's Civil Rights Division to investigate and rule on fair housing cases. Nearly all complaints that are submitted to HUD and originate within Arizona, except for Phoenix, are processed by the Attorney General's office.

Filing a complaint with the Arizona Attorney General is simple. Initiating the process is done by completing an intake complaint form. The form is to be delivered to the Attorney General's office by mail, fax, or via the internet. This form is located at http://www.azag.gov/civil_rights/CivilRightsIntake.pdf. [update](#) web address

The Attorney General advises persons wishing to file a complaint to consider the following when completing the complaint:

1. First, make a separate list of the things you want to say.
2. Present the events in the order in which they happened using dates whenever possible.
3. Type or print legibly in ink.
4. Enclose copies of documents such as records, letters, contracts, policies, manuals, receipts, or other documents that you have regarding the incident of discrimination. KEEP ORIGINAL DOCUMENTS FOR YOUR FILES.
5. Remember that your questionnaire should describe the event or incident that you believe to be discriminatory. If possible, state why the act was discriminatory.
6. Mail or deliver your questionnaire to the Phoenix or Tucson office.
7. Upon receipt of your questionnaire, a member of our staff will review your questionnaire and contact you. This process may take up to two weeks after our receipt of your questionnaire, depending on the circumstances and the information you are able to provide with your questionnaire.

Typically, after receiving the complaint, the Attorney General will notify the alleged violator of the complaint, and that person must submit a response. The Attorney General will investigate the complaint and determine whether reasonable cause exists to believe that the Fair Housing Act has been violated. If the Fair Housing Act has been violated, the Attorney General will try to reach a conciliation agreement with the respondent. If an agreement is reached, the Attorney General will take no further action on the complaint. If the Attorney General finds reasonable cause to believe that the discrimination occurred, and no conciliation is reached, the case will be heard in an administrative hearing within 120 days. The case may be handled by the Department of Justice (DOJ) and heard in U.S. District Court if one of the parties so desires.

U.S. Department of Housing and Urban Development

Individuals who believe they have been discriminated against in a housing transaction may also file a complaint with the HUD Enforcement Division in San Francisco. The first step in filing a complaint with HUD is to submit a Housing Discrimination Complaint form explaining the nature of the alleged violation. Housing discrimination complaint forms are available on the Internet portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process. A complaint form or additional information may also be obtained by calling the HUD Housing Discrimination Hotline at 1-800-669-9777, or by writing to the following address:

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Room 5204
451 Seventh St. S.W.
Washington, DC 20410-2000

If HUD adjudicates the case, HUD lawyers will litigate the case for the complainant before an Administrative Law Judge (ALJ). If the ALJ decides that discrimination occurred, the respondent can be ordered:

- To compensate for actual damages, including humiliation, pain, and suffering.
- To provide injunctive or other equitable relief; for example, to make housing available.
- To pay the federal government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation, \$27,500 for a second offense, \$50,000 for a third violation within seven years.
- To pay reasonable attorney's fees and costs.

Fair Housing Complaints and Testing

Complaints

Fair housing complaint data is recorded by *basis*, representing the protected class, and *issue*, representing the particular unlawful activity that took place. Basis data also tracks responses to housing complaints, such as acts of harassment or retaliation. Further, there may be more than one basis or issue arising from a single complaint. HUD data includes data processed by the Arizona Office of the Attorney General (AGO) and HUD. Under the Fair Housing Assistance Program, HUD has had a work-sharing agreement with the AGO since 1993 and most cases are processed by the AGO. HUD retains jurisdiction to process a small set of cases – generally those involving allegations of discrimination involving a recipient of HUD funds where there is an issue that involves interpretation of HUD's regulations or program policies.

During the period from January 1, 2016 to December 15, 2020, fair housing complaints from Flagstaff residents were filed mostly on the basis of disability. The Data from this period points to housing discrimination, primarily on the basis of disability. The higher rate of fair housing complaints on the basis of disability may also point to higher awareness of fair housing laws among persons with disabilities.

Suits Filed by the US Department of Justice or the Arizona Attorney General's Office

Under the Fair Housing Act, the Department of Justice (DOJ) may bring lawsuits in the following instances:

1. Where there is reason to believe that a person or entity is engaged in what is termed a "pattern or practice" of discrimination, or where a denial of rights to a group of people raises an issue of general public importance;
2. Where force or threat of force is used to deny or interfere with fair housing rights, the DOJ may institute criminal proceedings; and,
3. Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD, or file their own lawsuit in federal or state court. The DOJ brings suits on behalf of individuals based on referrals from HUD.

No evidence was located indicating that the U.S. Department of Justice or the Arizona Attorney General's Office has brought a lawsuit in the City of Flagstaff.

Fair Housing Testing

Fair housing testing can be a useful measure for evaluating the operation of a housing market for compliance with fair housing law. Some organizations have an enforcement plan in place which stipulates the types and the degree to which they will perform testing. Many organizations, including the City of Flagstaff, do not have an enforcement plan. The Southwest Fair Housing Council (SWFHC) conducts fair housing testing in Flagstaff through an agreement with the US Department of Housing and Urban Development.

The results of testing by SWFHC indicate that housing discrimination is occurring in Flagstaff, with a higher rate of housing discrimination in rental housing based on disability.

Community Survey

The Southwest Fair Housing Council designed a survey to understand fair housing issues and patterns of housing discrimination and shared this survey with the City of Flagstaff. The City posted a virtual survey and distributed the access info for the survey through multiple e-mailing lists, public housing newsletters, flyers sent to the offices of housing and social service agencies, on City of Flagstaff social media accounts and on the City's website. Though the survey is neither scientific nor statistically significant, it does provide insight into people's understanding of and attitudes towards fair housing, helps to shed light on the extent that residents perceive housing discrimination is occurring and the types of discrimination that may be most prevalent, and provides context for training and education needs.

84 surveys were completed or returned and not every respondent answered every question. Some respondents gave more than one answer to a question or gave narrative answers that were interpreted and counted in one of the survey categories when possible. Survey respondents generally reflected the demographic composition of the City. Of survey respondents: 38% were a racial or ethnic minority and 71% were White/Anglo; 40% were male, 55% were female, 4% were non-binary, and 1% were transgender; 41% had children in the household; 22% included a household member with a disability; 53% were one or two-person households; 36% were low-to-moderate income; and 43% were homeowners.

While the majority (65%) of respondents indicated they have not encountered or do not know someone who has encountered housing discrimination, 36% indicated that they know someone who has or think they know someone who has.

Have you or someone you know ever encountered one or more forms of the described housing discrimination in your local area?	
	Responses
No, I have not and don't know anyone who has.	56%
Don't know	8%
Yes, I have or I know someone who has.	24%
I think I may have or I may know someone who has.	12%

Among those respondents who indicated they had encountered housing discrimination or knew someone who had, respondents identified, in rank order, refusing or discouraging to rent an apartment or buy a home, or charging more to rent an apartment or buy a home followed by steering as the most common types of housing discrimination.

If you believe that you or someone you know encountered housing discrimination in your local area, please write down the letter(s) from the shaded boxes at the beginning of the survey that best describes the type of discrimination.	
	Responses
Refusing, discouraging or charging more to rent an apartment or buy a home.	66%
Discouraging a person from living where he or she wants to live, often by steering him or her to another apartment, complex or neighborhood.	38%
Refusing, discouraging or charging more for home insurance.	10%
Refusing or making it hard to get a loan to buy or refinance a house or take out home equity by doing things like charging more money or offering a worse deal than someone should be able to get if he or she shopped around.	14%
Predatory lending: unfair, misleading, or deceptive or fraudulent loan practices.	10%
Discrimination based on disability: Refusing to make a reasonable accommodation, refusing to allow a modification to make an apartment more accessible for persons with a disability or lack of accessible units.	21%

Slightly more than half of survey respondents believe that housing discrimination is either likely or does occur. Among those indicating that housing discrimination is likely or occurring, refusing or discouraging to rent an apartment or buy a home was followed by steering as the most common types of housing discrimination.

Do you believe housing discrimination occurs in your local area?	
	Responses
Yes	38%
No	5%
Likely	32%
Unlikely	26%

If you think housing discrimination is occurring in your local area, what types do you think are most prevalent?	
	Responses
Refusing, discouraging or charging more to rent an apartment or buy a home.	73%
Discouraging a person from living where he or she wants to live, often by steering him or her to another apartment, complex or neighborhood.	62%
Refusing or making it hard to get a loan to buy or refinance a house or take out home equity by doing things like charging more money or offering a worse deal than someone should be able to get if he or she shopped around.	38%
Discrimination based on disability: Refusing to make a reasonable accommodation, refusing to allow a modification to make an apartment more accessible for persons with a disability or lack of accessible units.	52%
Refusing, discouraging or charging more for home insurance.	21%
Predatory lending: unfair, misleading, or deceptive or fraudulent loan practices.	37%

When asked how well informed they were about housing discrimination, 59% of respondents felt either very informed or somewhat informed.

How well informed are you about housing discrimination?	
	Responses
Very informed	17%
Somewhat informed	42%
Not very informed	32%
Not at all informed	10%

When asked what they would do if they encountered housing discrimination, 33% of survey respondents indicated that they would report housing discrimination if they encountered it and 33% indicated that they would not know what to do. Multiple respondents indicated that they would both tell the person that they believed they were discriminating and then report it.

What would you do if you encountered housing discrimination?	
	Responses
Report it	33%
Would not know what to do	33%
Tell the person that you believe they are discriminating	18%
Do nothing and seek other housing options	17%

To measure understanding of the complaint and reporting process, survey respondents were asked where they would report housing discrimination. More than one-third of respondents indicated they would contact the City of Flagstaff, followed closely by contacting HUD. Several respondents stated that if the City did not provide relief they would report the City for failure to act. Other responses included Southwest Fair Housing Council, Arizona Department of Real Estate, Flagstaff Housing Authority, and the Arizona Department of Housing.

If you wanted to report housing discrimination, who would you report it to?	
	Responses
City of Flagstaff	23%
HUD	20%
Attorney General	5%
Don't know / Not sure	38%
Other	13%

More than half of survey respondents answered the question about what might be done to help prevent housing discrimination. About one-third (33%) indicated that education and training was most needed, while 13% of respondents indicated that more affordable housing would help solve the problem. Other ideas included enforcement, advertising, reporting, investigation, and fines. One respondent suggested that all applicants for housing, both rental and purchase, should receive a pamphlet describing their fair housing rights and what to do if they believe they have been discriminated against.

What do you think should be done to help prevent housing discrimination?	
	Responses
Education /Training	33%
Don't know	6%
Provide more affordable housing	13%
Make landlords/offenders accountable for their actions	27%
Report it	8%
Other	13%
Investigating/monitoring	4%
Local Investigations / Investigations	2%
Background checks and uniform reporting for lending agencies	0%
Stop making banks lend money to people who can't afford it since there is a correlation of race and income	0%
Stop discriminatory development practices/favors to friends so the market can stabilize	0%
Use clear policies with oversight from supervisors/ management to ensure their proper application	0%

Community Interviews

During November and December 2020, 45 industry stakeholders were contacted for fair housing interviews and 45 agreed to participate. Many of those contacted indicated that they would be open to completing a survey rather than participating in an interview, while others asked to be removed from the contact list. The goal of the interview process was to contact people having expert knowledge about housing in Flagstaff and to assess their awareness of fair housing compliance, collect their thoughts on perceived impediments to fair housing choice, and to solicit their thoughts about fair housing barriers and constraints in Flagstaff. The results of these interviews provide qualitative information and insight into fair housing issues in Flagstaff. Some interviewees provided multiple answers to the interview questions.

Measuring respondents' knowledge of fair housing laws was one goal of the interviews. Interviewees were asked to name the classes that are protected by Fair Housing laws. Industry stakeholders were most likely to be able to cite several protected classes and demonstrate a general idea of the protected classes and only 22% were able to cite all of the protected classes; a small few knew there are seven protected classes. Industry stakeholders were more likely to be aware that Fair Housing Laws protect specific classes than were other community leaders and participants who were more likely to cite everyone or to identify participants in the market (renters / purchasers).

Understanding of Fair Housing Law – Protected Classes	
Don't know – at least 5 protected classes	7%
Don't know – at least 7 protected classes	2%
Race, Religion, Sex, Handicap, Familial Status, National Origin	22%
Everyone	20%
Race, Color, Religion, Sex, Handicap, Familial Status, National Origin	53%
Other	7%

Interviewees were asked if they felt the Fair Housing laws served a useful purpose and the majority indicated that they do. Interviewees were also asked if they found Fair Housing laws to be clear and easy to follow. While the majority agreed the laws were useful, fewer felt that the laws were easy to follow.

Understanding of Fair Housing Law – Usefulness and Clarity		
	No	Yes
Fair Housing Laws are Useful	9%	91%
Fair Housing Laws are Clear and Easy to Follow	47%	53%

Another question was whether the interviewee had attended Fair Housing training in the past three years, and if so who sponsored the training. 38% stated they had attended a City of Flagstaff Fair Housing training event.

Education and outreach have been primary tools of the City to address Fair Housing in Flagstaff and it is important to understand whether stakeholders and potential local leaders would be interested in attending additional training in the future. 35 interviewees indicated they would attend additional training if offered by the City.

Outreach and Education – Access to Training	
Attended in Past 3 Years	26
City-sponsored	11
Employer or Licensor sponsored	6
Would attend in future if City offered	35

Interviewees were asked to identify to whom they would refer a housing discrimination complainant. Responses were varied, with most identifying the City of Flagstaff as the primary contact. The varied responses indicate confusion regarding the referral system and complaint system. This confusion is a barrier to complainants accessing the fair housing complaint system.

Understanding of Fair Housing Complaint System	
	Responses
City of Flagstaff	11
Attorney General's Office	5
HUD	15
Other	13

The interviews also addressed testing. Interviewees were asked if they were familiar with testing and provided a brief overview of what constituted testing. Interviewees were then asked if they felt there was a need for testing. 63% of interviewees were not familiar with testing and did not feel comfortable expressing an opinion about the accuracy of testing or the need for future testing. Among those familiar with testing, 23 indicated that more testing was needed.

Understanding and Accuracy of and Need for Testing	
	Responses
Familiar with Testing	30
Accurately Measures Fair Housing Issues	13
More Testing Needed	23
Less Testing Needed	2
Same Amount of Testing	7

The final line of inquiry was whether interviewees felt the City needed a formal plan to address Fair Housing. A resounding 86% of interviewees indicated that a Plan is needed. **Several interviewees indicated that while a Fair Housing planning is needed it should be integrated into a larger housing plan that addresses housing availability and affordability.**

Need for Local Fair Housing Plan		
	No	Yes
Plan Needed	14%	86%

Public Policies and Practices

Zoning, Land Use and Development

Over the past decade, the City has taken extensive steps to remove barriers and promote affordable housing development, including the development of an Incentive Policy for Affordable Housing (IPAH), adopted in October 2009 and later integrated into the City zoning code. The IPAH is designed to foster the production of affordable housing units and is intended to reduce the deficit of all types of housing for households earning under 150% of the Area Median Income (AMI). The IPAH incentivizes developers that commit to permanently affordable housing units through the reimbursement of development-related fees. The Flagstaff Zoning Code also implements affordable housing incentives through various development standards like density bonuses and reductions to parking and resource protection.

A current zoning code amendment is being processed that would allow for increased regulatory incentives for developers who deliver 100% affordable projects. This amendment is being proposed separately from a revision of the IPAH and related zoning code incentives, primarily to accommodate the tight external timeline requirements of any current and upcoming Low-Income Housing Tax Credit projects in the City. City staff is currently working on a comprehensive update to the existing IPAH document. Interviews with the development community and housing practitioners will help shape new concepts and revisions, along with guidance from a working group made up of members from the City's Housing and Planning and Zoning Commissions. The intent of this update to the incentive policy is to ensure the incentives offered are not only useful and effective, but that they are flexible enough to be applied under varied market conditions.

In the last couple of years, the City has adopted several zoning code amendments that implement policies and recommendations from the High Occupancy Housing Specific Plan, which was adopted in 2018. The intent of the Plan was to identify areas of the city where high density residential projects are encouraged, and what development standards, features, and amenities are desired in those projects. Recent zoning code amendments included an exemption from a use permit requirement for projects that meet certain affordable housing requirements.

The IPAH incentivizes developments that commit to permanently affordable housing units. When a developer takes advantage of the incentives offered under the IPAH, the affordable units are legally committed to the intended population through occupancy, resale and rent restrictions. The 2021 update to the City's incentive policy may include additional provisions for a wider array of affordable commitments rather than exclusively permanent affordability. The update may also consider methods for determining an "in-lieu" payment option to support affordable housing efforts through the city

and its partners; if a specific dollar amount is known by a developer, they may prefer budgeting for that specific dollar amount up front, rather than accept the unknown costs associated with constructing and selling/renting affordable units.

Review of Public Policies and Practices

The development and subsequent implementation of policy initiatives are critical to the success of the City of Flagstaff’s overall housing and economic development goals. In general, policy development and implementation are designed to enhance City program effectiveness, identify gaps or underserved groups, and enhance the private sector’s ability to provide market-based solutions. At present, the greatest obstacle to meeting underserved needs is insufficient funding. The City addresses this obstacle by prioritizing CDBG projects that provide leverage funding to meet the needs of a larger number of people.

In December 2020, Flagstaff City Council declared a Housing Emergency via Resolution 2020-66. The Resolution recognizes the need to make housing a leading priority for the City of Flagstaff as an organization and the community overall. It also calls for a number of efforts to be undertaken, among them, the development of a 10-year housing plan (underway), the creation and implementation of a public outreach campaign to educate the community about the critical role affordable housing plays in a thriving community and combating “Not in My Backyard” opposition to housing and affordable housing.

The City’s growing population will require an increased emphasis on housing choices in the future. The region’s housing is influenced by:

- Limited supply of land for development;
- Approximately forty percent (40%) of Flagstaff’s households are by definition low- to moderate-income (City FY 2016 - 2020 HUD Consolidated Plan);
- Consistent but modest rate of population growth;
- NAU’s total enrollment has grown by 16.2 percent in the last five years (Fall 2013 – Fall 2018); and
- Housing needs for the elderly, multigenerational families and downsizing will increase over the next several decades as the Baby Boom generation moves into the retirement years.

Local growing population sectors include the elderly, students, single-parent households, and nonfamily households. These community members need a variety of housing options within proximity to jobs, schools, and services. NAU students currently make up approximately thirty percent (30 %) percent of the local population, and their continued demand for student housing impacts cost and availability of housing in the region, resulting in a higher demand for multi-family housing, or housing affordable for single-incomes or multiple low incomes.

An annual survey conducted by a local non-profit, Housing Solutions of Northern Arizona (HSNA), continues to show rising rates and less availability of rental units within City limits. As of May 2019, the data shows 801 people on waiting lists at income-restricted complexes. Market rate rental averages were measured as follows:

\$808 for a room/shared living	up 9.5%
\$979 for a studio	up 7.7%
\$1,214 for a one-bedroom.....	up 4%
\$1,494 for two-bedroom.....	up 3.7%
\$1,819 for a three-bedroom	down 2.5%

These actual rents have been well above the HUD Fair Market Rents (FMRs) for several years. The HSNA survey states, “In order to afford an average two-bedroom apartment - without paying more than 30% of income on housing - a household must earn approximately \$4,980 monthly, \$59,760 annually, or \$28.73 hourly (assuming a 40-hr work week and 52 weeks/yr.).” The City is experiencing an immediate need to house hundreds of households at more affordable rates

The Housing Plan will consolidate existing housing documents and augment with an additional planning effort to create a 10-year plan that seeks to define the housing emergency in Flagstaff and to provide policies and strategies to reduce the emergency. The Housing Plan will help identify needs, create an existing list of affordable housing, identify the affordable housing units underway, engage partners, and compile research on best practices. Altogether, these components will help identify specific policies and educational and advocacy strategies that can be implemented within our community to substantially increase the number of affordable housing units. As the City implements Flagstaff’s 2021 Housing Plan, the goal is to substantially increase the number of available and affordable housing options for all Flagstaff residents at all income levels.

The City of Flagstaff utilized a HUD survey to identify impediments with respect to zoning, land use and development. The purpose of the survey was to identify zoning regulations, practices and procedures that act as barriers to the development, siting and use of housing for individuals with disabilities. The HUD-adopted survey was completed by City staff with zoning and land use responsibilities, and respondents’ comments are noted below in italics. The survey indicates that the City’s zoning, land use and development regulations, practices and procedures do not act as barriers to the development, siting and use of housing for individuals with disabilities.

TABLE 40 - HUD FAIR HOUSING IMPEDIMENT STUDY - REVIEW OF PUBLIC POLICIES AND PRACTICES		
	Yes	No
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?		<input type="checkbox"/>
Zoning Regulation Impediment: Does the Code definition of “disability” the same as the Fair Housing Act?	<input type="checkbox"/>	
Practice Impediment: Are personal characteristics of the residents considered?		<input type="checkbox"/>
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”?		<input type="checkbox"/>
Practice Impediment: Does the zoning ordinance deny housing opportunities for disability individuals with on site housing supporting services?		<input type="checkbox"/>
Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?		<input type="checkbox"/>

TABLE 40 - HUD FAIR HOUSING IMPEDIMENT STUDY - REVIEW OF PUBLIC POLICIES AND PRACTICES		
	Yes	No
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?		<input type="checkbox"/>
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 <u>all</u> applicants?		<input type="checkbox"/>
Does the zoning ordinance address mixed uses? How are the residential land uses discussed? <i>Within the Commercial Zoning districts, residential units are allowed by right as long as site conditions are met; Planned Residential is an additional opportunity that may provide for mixed uses; the City also promotes Form Based Code design and development.</i> What standards apply? <i>The City requires design standards and compatibility exercises that deal with the form/design of the neighborhood, including access to services.</i>	<input type="checkbox"/>	
Does the zoning ordinance describe any areas in this jurisdiction as exclusive? Are there exclusions or discussions of limiting housing to any of the following groups? If yes, check all of the following that apply: Race____Color____Sex____Religion____Age____Disability____ Marital or Familial Status____Creed of National Origin____		<input type="checkbox"/>
Are there any restrictions for Senior Housing in the zoning ordinance? 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)?		<input type="checkbox"/>
Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? <i>Provisions for housing accessibility for people with disabilities are specified in the City's building code.</i>	<input type="checkbox"/>	
Does the zoning ordinance establish occupancy standards or maximum occupancy limits? Do the restrictions exceed those imposed by state law? <i>Provisions for maximum occupancy are specified in the City's building code and are consistent with state law.</i>		<input type="checkbox"/>
Does the zoning ordinance include a discussion of fair housing? If yes, how does the jurisdiction propose to further fair housing? <i>The zoning ordinance includes a reference to the Fair Housing Act in the definition of "family".</i>	<input type="checkbox"/>	
Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking. <i>2% of the spaces required for multi-family complex are required to be accessible.</i>	<input type="checkbox"/>	
Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)?		<input type="checkbox"/>
Does the zoning code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)?		<input type="checkbox"/>

TABLE 40 - HUD FAIR HOUSING IMPEDIMENT STUDY - REVIEW OF PUBLIC POLICIES AND PRACTICES		
How are “special group residential housing” defined in the jurisdiction zoning code? <i>The City has adopted the State’s statutory definition of “A residential facility (for 8 or fewer unrelated persons – not including staff = 10 total) providing living facilities, sleeping rooms and</i>		?
<i>meals. This use shall be considered as a single-family dwelling, in terms of applicable building standards. This category does not include a home for the developmentally disabled or other institutional uses such as protected living or sheltered care facilities, see “Institutional Residential”.</i>		
Does the jurisdiction’s planning and building code presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Is there any provision for monitoring compliance?		?

Public Housing and Section 8

Public Housing Authority Policies

The City of Flagstaff Public Housing Authority (PHA) addresses the needs of extremely low income, low income and moderate-income families through the provision of public housing and housing choice vouchers. The PHA manages 265 public housing units and 333 Housing Choice Vouchers. In addition, the PHA manages 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability and provides 12 SRO Section 8 vouchers for persons with serious mental illness through a partnership with the Guidance Center. The Public Housing program and Housing Choice Voucher (Section 8) programs have been designated by HUD as “High Performing”.

According to data provided by HUD for the 5-year Consolidated Plan, 42% of public housing residents are White, 2% are Black/African American, 54% are Native American, and 30% are Hispanic. Among Housing Choice Voucher participants 67% are White, 7% are Black/African American, 1% are Asian, 25% are Native American and 22% are Hispanic. Elderly people comprise 15% of public housing residents and 15% of Housing Choice Voucher participants. Families with a person with a disability comprise 10% of public housing residents and 36% of Housing Choice Voucher participants.

Section 8 Program Background and Guidelines

The Section 8 Program was enacted as part of the Housing and Community Development Act of 1974, which re-codified the U.S. Housing Act of 1937. The program objectives of Section 8 are to provide decent, safe, and sanitary housing for very low income families while maintaining rent payments at an affordable level, to promote freedom of housing choice and spatial deconcentrating of very low income families of all races and ethnic backgrounds, and to provide an incentive to private property owners to rent to very low income families by offering timely assistance payments.

Administration of the City of Flagstaff Section 8 programs are in compliance with the HUD Section 8 regulations as well as all federal, state and local Fair Housing Laws and Regulations. It is the intent of the program not to deny any family or individual the opportunity to apply for, or receive, assistance under any programs on the basis of race, color, sex, religion, national or ethnic origin, age, familial status, handicap, disability, or sexual preference.

- **Section 8 Housing Choice Vouchers** are the most common vouchers. The waiting list for these vouchers opens periodically and applicants can use vouchers to subsidize their rent at a conventional market rental with a landlord interested in participating in Section 8. As of April 9, 2020, this waiting list is closed.
- A limited number of **Homeless Vouchers** are dedicated to those experiencing homelessness; those experiencing homelessness may qualify for a non-homeless voucher before they would receive a dedicated homelessness voucher. In addition, **Mainstream Vouchers** are dedicated to households with a non-senior person with a disability. These vouchers are drawn from the same waiting list for Housing Choice Vouchers and do not require a separate application.
- **Single-Room Occupancy-Moderate Rehabilitation (SRO-Mod Rehab) Vouchers** are issued by the Flagstaff Housing Authority in collaboration with the [The Guidance Center](#). These vouchers serve individuals experiencing homelessness with disabilities in a congregate residential setting. Vouchers are issued only through a referral process, beginning with case work from the [The Guidance Center](#).
- **Veteran Affairs Supportive Housing (HUD-VASH) Vouchers** are issued to veterans and their families experiencing homelessness. These vouchers are available by VA referral only.
- **Foster Youth to Independence (FYI) Vouchers** serve young people, aged 18-24, who are aging out of the foster care system. Vouchers are issued only by referral from [the Arizona Department of Child Safety \(AZ DCS\)](#).

The preferences process of the City of Flagstaff Section 8 Program assigns all applicants to a waiting list in the order of preference status by order of date and time of the application. Preference is given to those who live or work in Flagstaff, however the PHA accepts applications from both residents and non-residents; preference categories are:

1. First preference is given to homeless families (up to 4/year).
2. Second preference is given to transitional housing local preference.
3. Special provision is given to homeless Veterans for VASH.

Public Housing Guidelines

The preferences process of the City of Flagstaff Section 8 Program assigns applicants to a waiting list in the order of preference status by order of date and time of the application. The preference categories are:

1. First preference is given to residents of Flagstaff or those employed in Flagstaff.
2. Special provision is given to elderly persons for 1-bedroom units.

The Housing Authority will not house an applicant if any member of the family is a person who was evicted during the past three years because of drug-related criminal activity from housing assisted under a 1937 Housing Act program.

Property Tax Policies

Property taxes in Arizona include a primary and secondary tax. The primary tax is set at the state level and governed by Arizona Revised Statutes and the State Constitution. Receipts from primary property taxes are deposited in the General Fund. The City of Flagstaff utilizes these revenues to support Police, Fire, Recreation, Community Development, Library, Central Services and Housing programs. The State limits the annual increase of revenue collected to 2% plus any new construction.

The secondary tax rate can be changed locally only through the passage of designated, voter-approved bonds for

capital projects. While increased property taxes may have a disparate impact on low-income households, including protected classes, the property tax rate has not increased in Flagstaff during the past three years.

Landlord/Tenant Policies

Rental housing policies are governed by the Arizona Residential Landlord Tenant Act. Because there is considerable gray area between landlord/tenant issues and fair housing issues, all public and private agencies that handle housing issues need to train their staff to recognize potential fair housing issues, which may appear to be landlord/tenant issues, and accurately refer clients to where they can get information and help. The Arizona Residential Landlord Tenant Act is available online at www/housing.az.gov.

National Reports and Studies

National Fair Housing Alliance – Fair Housing Trends Data for 2020

<https://nationalfairhousing.org/wp-content/uploads/2020/09/NFHA-2020-Fair-Housing-Trends-Report.pdf>

The 2019 complaint data continues to show that private fair housing organizations address the majority of housing discrimination complaints that are reported throughout the country. In 2019, private, non-profit fair housing organizations processed 73.12 percent of complaints, as compared to 6.13 percent by HUD, 20.61 percent by FHAP agencies, and 0.14 percent by DOJ.

There were 28,880 reported complaints of housing discrimination in the U.S. in 2019. This is a reduction of approximately 7.5 percent from 2018's total of 31,202, which was the largest total since the early 1990s. There were 17,010 cases that involved discrimination against a person with a disability, or 58.90 percent of all cases. Discrimination against persons with disabilities is the easiest to detect, as it most often takes place as an overt denial of a request for a reasonable accommodation or modification to the housing unit. The second most reported type of housing discrimination was on the basis of race, with 4,757 or 16.47 percent of all cases. This was followed by familial status as the third most frequent basis for discrimination, with 2,228 cases or 7.71 percent of all cases of housing discrimination. The fourth most frequent basis of discrimination was sex, with 1,948 complaints or 6.75 percent of all complaints. The fifth most frequent basis was national origin, with 1,730 reported cases or 5.99 percent of all complaints. Color was a basis of discrimination for 646 complaints or 2.24 percent of all complaints, and religion was the basis of 328 complaints or 1.14 percent of all complaints nationwide.

As in prior years, rental-related housing discrimination complaints reported in 2019 were the most numerous. This is due primarily to the fact that rental transactions are the most frequent type of housing transaction, and the simplicity of the transaction can make it easier to identify or suspect discrimination. In 2019, there were 24,186 rental complaints reported across all agencies, and 18,889 of these were reported by private fair housing organizations. The number of rental-related complaints reported in 2019 is slightly fewer than in 2018. Rental-related complaints in 2019 accounted for 83.75 percent of all transaction types reported, compared to 83.39 percent in 2018 and 82.05 percent in 2017.

Real estate sales complaints comprised 2.7 percent of all housing discrimination cases reported in 2019, with 779 complaints total. This number represents a decrease from 2018 when 897 sales complaints were reported, and a decrease from 805 complaints reported in 2017. Real estate sales complaints may be decreasing because homeownership rates in the U.S. have not rebounded from the 2008 housing crash. According to the National Association of Real Estate Brokers (NAREB), the Black homeownership rate stood at 40.6 percent at the end of the second quarter of 2019, a decrease of 1 percent between 2018 and 2019. The gap in homeownership rates between Black and White households is larger than it was in 1968 when the Fair Housing Act was enacted.

In 2019, there were 234 complaints of lending discrimination, a decrease from the previous two years. These complaints represented less than 1 percent of all complaints. In 2018, there were 330 lending complaints, and in 2017, there were 380 complaints.

In recent years, HUD has stepped up its efforts to achieve the goals of the Fair Housing Act's AFFH provision by taking action when it finds that jurisdictions (municipalities, counties, states and Public Housing Authorities) that receive HUD funding are not fulfilling their fair housing obligations. HUD's actions provide an illustration of the kinds of policies that may be obstacles to overcoming segregation and its ill effects on society. Some of these policies include:

- Locating subsidized housing only in poor communities of color.
- Adopting exclusionary zoning policies that make it impossible to develop affordable housing within the jurisdiction.
- Using local powers for issuing permits and approving projects to prevent new affordable housing developments from being built.
- Failing to adopt strategies or take actions to overcome the effects of public actions that aggravate the shortage of affordable housing.
- Requiring local approval for Low Income Housing Tax Credit projects, effectively giving hostile jurisdictions veto power over new developments; and,
- Making plans to reduce the number of public housing units and Housing Choice Vouchers within the jurisdiction.

A Paired-Testing Pilot Study of Housing Discrimination against Same-Sex Couples and Transgender Individuals

https://www.urban.org/sites/default/files/publication/91486/hds_lgt_final_report_3.pdf

Diane K. Levy Doug Wissoker Claudia L. Aranda Brent Howell Rob Pitingolo Sarale Sewell Rob Santos June 2017

To more accurately document discrimination against same-sex couples and transgender homeseekers, studies were conducted in the Dallas–Fort Worth, Los Angeles, and Washington, DC, metro areas using paired testing, a powerful research tool that can capture discrimination in action.

Findings indicate that in the early stages of the rental search process, housing providers discriminate against gay men and transgender people on some treatment measures but treat lesbians and heterosexual women comparably.

In paired testing, two testers pose as equally qualified home seekers, differing only in a specific characteristic. For our pilot studies in the Dallas–Fort Worth and Los Angeles metros, we compared the experiences of, for example, a lesbian posing as part of a couple with a heterosexual woman posing as part of a couple to observe discrimination based on sexual orientation. Lesbian and gay testers and their heterosexual counterparts disclosed their sexual orientation to housing providers early by referencing a partner or spouse by a gender-specific name.

In the Washington, DC, metro area, the experiences of transgender and cisgender home seekers were compared. This study was smaller than the sexual orientation pilot study and tested research methods to inform future work. These tests were split into two groups—in half the tests, transgender testers explicitly identified as transgender to providers; in the other half, testers did not explicitly disclose their gender status.

Housing providers discriminated against gay men and transgender people on some measures

After conducting 2,009 paired tests, it was found that housing providers told gay men about one fewer available unit on every 4.2 tests than they told heterosexual men about, were slightly less likely to schedule an appointment with gay men, and quoted gay men average yearly rent costs that were \$272 higher.

Housing providers were about equally likely to schedule an appointment with lesbians and with heterosexual women, told them about and showed them approximately the same number of rentals, and provided comparable information about rents and incentives. Differences across treatment measures of availability and inspections consistently disadvantaged lesbian testers, but the differences generally were small and not statistically significant.

Providers told transgender testers about fewer rentals than they told cisgender testers, regardless of the protocol used. Transgender testers who disclosed their gender status were less likely to be told about available rentals on average. They were, however, more likely to be allowed to view available units than transgender testers who did not disclose. It is unclear why.

A Pilot Study of Landlord Acceptance of Housing Choice Vouchers

<https://www.huduser.gov/portal/portal/sites/default/files/pdf/Landlord-Acceptance-of-Housing-Choice-Vouchers.pdf>

Mary K. Cunningham Martha M. Galvez Claudia Aranda Robert Santos Douglas A. Wissoker Alyse D. Oneto Rob Pitingolo James Crawford August 20, 2018

The U.S. Department of Housing and Urban Development (HUD) sponsored the first large-scale, multisite study of whether landlords treat people with vouchers differently than other renters.

The project's goals were to (1) identify testing methodologies for measuring differential treatment of renters who use housing vouchers authorized under Section 8(o) of the United States Housing Act of 1937, (2) identify the types and patterns of rental housing discrimination against voucher holders, and (3) measure the prevalence and extent of voucher-related discrimination, including differences in discrimination against racial and ethnic minorities and differences between low- and high-poverty neighborhoods.

The Housing Choice Voucher (HCV) program is the federal government's largest rental housing assistance program. The goals of the HCV program are to increase access to safe, affordable housing units and to provide opportunities for low-income families to obtain rental housing outside areas of poverty or minority concentration (HUD, 2009). Voucher holders can, in theory, move anywhere in the country where a PHA administers the program, but their housing choices are severely constrained by their ability to navigate the private rental market, find a unit with rent below the payment standard, and identify a landlord who will participate in the program. Landlords decide, for the most part, if they want to accept vouchers as payment for their rental units.

Is it illegal for landlords to refuse to rent to voucher holders?

The Fair Housing Act (Public Law 90-284), enacted in 1968 as Section VIII of the Civil Rights Act, aims to "prevent segregation and discrimination in housing, including in the sale or rental of housing and the provision of advertising, lending, and brokerage services related to housing." Under the Fair Housing Act, landlords are prohibited from refusing to rent to members of protected classes—defined based on race, color, national origin, sex, religion, disability, and familial status. Voucher holders are not protected under the Act and landlords may have a legal right to turn away voucher holders.

Although voucher holders are not protected under the Fair Housing Act, the program disproportionately serves members of protected classes—families with children, racial and ethnic minorities, and persons with disabilities. Some fair housing advocates argue that claims under the Fair Housing Act may be justified, because the act prohibits practices that may appear neutral—such as electing not to accept vouchers—but result in "disparate impacts," for example, residential segregation, for a protected class. Beyond the federal statute, states and local jurisdictions have passed local ordinances, often referred to as source-of-income protections, to prohibit discrimination against voucher holders. In these locations, it is illegal for landlords to discriminate against voucher holders. For this study, the term discrimination is used to describe unequal or differential treatment of voucher holders, although this treatment is not necessarily illegal in all our testing sites.

Finding Voucher-Affordable Units Is Challenging

How difficult is it to find voucher-affordable units? For 16 months, more than 341,000 online advertisements across the five study sites were screened and found 8,735 advertisements for rental housing that appeared to be voucher eligible based on information in the ad. The effort required to find voucher-eligible housing differed dramatically across sites. For example, the average number of advertisements screened to identify a potentially eligible unit ranged from more than 50 in Los Angeles and Newark to 30 in Fort Worth, 19 in Washington, D.C., and 11 in Philadelphia. As the testers searched for units, they did not precisely model the housing search a voucher holder might conduct. Nonetheless, their experience shows that searching for housing with vouchers is time consuming and frustrating. Voucher holders must navigate the rental market on their own, searching for units that meet the program rental cap. This search requires combing apartment listings and making multiple telephone calls to landlords to inquire about apartment availability. Many searches turn up short.

Many Landlords Do Not Accept Vouchers

The voucher acceptance tests show clear evidence of outright denial of vouchers, although denial rates varied widely. Denial rates were highest in Fort Worth (78 percent) and Los Angeles (76 percent) and only somewhat lower in Philadelphia (67 percent). Rates were substantially lower in Newark (31 percent) and Washington, D.C. (15 percent). Moreover, across the five sites, between 9 and 25 percent of landlords said vouchers were accepted only under certain conditions or they were unsure of the voucher acceptance policy. Landlords were more likely to deny voucher holders in low poverty areas compared with high-poverty areas, particularly in the sites with the highest voucher denial rates.

There were lower landlord denial rates in sites that have legal protections against voucher discrimination. In Newark and Washington, D.C., where voucher holders are a protected class under local source-of-income antidiscrimination laws, denial rates were lower compared with sites without such protections. Philadelphia also has a source-of-income antidiscrimination law, but neighboring Bucks County does not.

The challenges encountered finding voucher affordable rental housing in some sites and neighborhoods suggest that voucher holders' housing searches are daunting. The difficulty finding landlords who will accept vouchers, particularly in low-poverty areas, likely increases the cost and duration of voucher housing searches, limits voucher holders' housing and neighborhood options, and increases costs to local PHAs and HUD. With this difficulty in mind, several policy and program changes should be considered to encourage landlord participation and to facilitate voucher holders' searches.

Pursue legal protections for voucher holders.

Although voucher holders are not a protected class, the program is comprised of households that are protected under the Fair Housing Act and thus outcomes from the HCV program have potential fair housing implications. Among the five study sites, landlord refusal of vouchers is more common in jurisdictions without source-of-income protections. Coupled with other available evidence, this finding suggests that legal protections for voucher holders might improve HCV program outcomes and merit further consideration.

Encourage landlord participation and recruit landlords, particularly in low poverty neighborhoods.

One way to increase landlord participation in the HCV program is to make it more attractive through recruitment strategies and incentive programs. Some PHAs and neighborhood mobility programs that help voucher holders search for housing have liaisons to recruit landlords in opportunity neighborhoods. HUD and PHAs could strengthen financial incentives (or remove perceived disincentives) for landlords to participate.

For instance, PHAs could offer one-time signing bonuses or financial incentives for new entrants or for landlords in low-poverty neighborhoods. Some jurisdictions are piloting initiatives that provide security deposits or insurance against damages or tenants vacating the unit before their lease expires. Other jurisdictions waive permit fees for repairs or improvements or provide landlords access to interest-free loans they can use to rehabilitate their properties.

Set rents to be more competitive and improve program management.

For vouchers to be appealing to private market landlords, they must offer rent payments comparable with the market.

This study did not examine the role of payment standards or Fair Market Rents (FMRs) in the availability of voucher-affordable housing or in landlord denial rates, but it was observed that some sites with higher payment standards had lower rates of landlord denial. Adopting Small Area FMRs or payment standards better aligned with market rents could make the HCV program more appealing to landlords in high-rent markets. In addition to offering competitive rents, improving PHA management could attract more landlords. Critics of the HCV program argue that there are good business reasons landlords do not participate; they include complaints about PHAs that have poor customer service or that increase the cost of renting to voucher holders by taking too long to complete housing quality standards inspections or by not sending rent checks on time. To increase customer satisfaction among landlords and decrease the real or perceived costs of doing business with housing authorities, PHAs could streamline these tasks so that landlords are not financially penalized for participating in the HCV program. Expand search time and provide housing search assistance. Extending search times from 60 days to 120 days would provide more time for voucher holders to identify landlords with units available. This extension is particularly important if voucher holders are searching for housing in opportunity neighborhoods or in tight housing markets where units are harder to find. Voucher holders may also benefit from housing search assistance—a combination of pre and post move counseling, landlord outreach, and financial support for moves.

The findings on the difficulty identifying landlords who accept vouchers— particularly in low-poverty areas—coupled with the evidence base on the importance of living in high-opportunity neighborhoods suggest these services may be an important step toward improving program outcomes and voucher holders' long-term well-being.

Conclusion

The process of finding an available unit, reaching landlords, finding a landlord to accept vouchers, and then meeting with them to view the available housing was extremely difficult. It takes a lot of work to find housing with a voucher. The search requires sifting through numerous advertisements, making numerous calls, and facing frequent rejection. The study reveals that many landlords refuse to accept vouchers. Voucher holders who want to find housing in an opportunity area—perhaps close to high-quality schools, jobs, and transportation— face even more rejection. Even if landlords said they accepted vouchers; they may treat voucher holders differently during apartment showings—standing them up at higher rates than control testers. Policymakers should remember that landlords are not passive actors in the HCV program. Landlords play a critical role in narrowing or widening the choices available to voucher holders in their search for safe, affordable, quality housing.

2016 Fair Housing Action Plan Review

Identified Impediments

The 2016 Fair Housing Action Plan identified six impediments to fair housing choice in the City of Flagstaff:

1. **Housing Discrimination.** A survey of Flagstaff residents, discussions with industry stakeholders, and fair housing testing data indicate housing discrimination exists.
2. **Community Education.** The number and nature of fair housing complaints in Flagstaff is low, yet the results of the community survey and interviews indicate that there is a need for more outreach and education.
3. **Minority and Low-income Areas of Concentration.** Concentrations of both minorities and low-income households exist in four Census Tracts.
4. **Lending Discrimination.** Home Mortgage Disclosure Act data indicates that 1) minority loan applicants and female loan applicants experience a disproportionately higher rate of loan denial, and 2) minority loan applicants and loan applicants in low-income and minority-concentration areas are also more likely to receive high-cost loans.
5. **Disability Accessibility.** Testing data from Southwest Fair Housing Council indicates that housing discrimination on the basis of disability is more likely to be supported. Complaint data from Southwest Fair Housing Council and the US Department of Housing and Urban Development indicate a higher volume of complaints based on disability.

2016-2020 Activities to Address Fair Housing Impediments

Community Development Block Grant Funding

Community Development Block Grant (CDBG) funding supports community development, infrastructure, affordable housing, human services, and other activities. In the context of limited CDBG and leverage funding, the City made significant progress towards investing in housing, and public and supportive services for vulnerable populations. The lingering economic recession and housing crisis resulted in more households needing these services and the City and agencies stepped in to provide a variety of services, many aimed at people at risk of or experiencing homelessness.

Significant progress was also made towards providing economic opportunities and a relatively large number of individuals benefitted from financial and housing counseling and several benefitted from employment training. Moderate progress was made towards enhancing Flagstaff neighborhoods – park improvements and housing rehabilitation were the most notable enhancements; however, the continuing high-cost of housing in Flagstaff presents challenges to acquiring and rehabilitating homes. Moderate progress was also made towards increasing the availability and affordability of housing for owners and renters in large part due to the economic recession and few opportunities to invest in additional housing. The City continued to make progress towards strengthening coordination and delivery of resources, integrating the Flagstaff Public Housing Authority and Housing Sections in one department and maintaining a high level of involvement with the Coconino County Continuum of Care.

Details regarding the historic expenditure of CDBG funding by the City are found in its Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER is produced annually and describes affordable housing and community development resources, methods of distribution, geographic funding objectives and the actions

that were taken during the program year.

Fair Housing Actions from the 2016 Analysis of Impediments to Fair Housing Choice

The CAPER also describes activities that the City has taken to affirmatively further fair housing by listing fair housing impediments and actions taken to overcome them. Specific fair housing activities regularly conducted by the City of Flagstaff include:

- All public meetings, including those related directly to the use and direction of Community Development Block Grant funds, are held in facilities accessible to those with disabilities.
- Advertisements encouraging public input, or announcing public meetings, include TDD numbers.
- Advertisements announcing public meetings incorporate the language: “Persons requiring hearing, visual, language, mobility or other accommodations may contact the City, at 928-213-2752 or TDD (928) 774-5281 to make special accommodations”.
- Specific notices for meetings and timelines are sent to a number of organizations within the community, including the Sunnyside Neighborhood Association, Southside Community Association and La Plaza Viejas Association. These organizations represent many of the residents who access services, as they are three of the four target neighborhoods. Most infill and rehabilitation projects occur in these neighborhoods. These neighborhoods are the most ethnically diverse in the City and have higher concentrations of low-income households.
- Specific notices for meetings and input timelines are sent to providers who serve people with disabilities.
- Separate from the City of Flagstaff, the Southwest Fair Housing Council provides Fair Housing and Landlord Tenant information/education to City of Flagstaff residents throughout the program year.
- The City of Flagstaff’s Housing Specialist acts as a liaison and point of contact for people with potential fair housing complaints. The City provides fair housing information and referrals.

Actions to address identified impediments are documented in each program year’s CAPER. While some actions are one-time actions, the following actions were successfully implemented annually:

1. Adopted a proclamation declaring April to be observed as Fair Housing Month.
2. Semi-annually published fair housing information in local newspapers, utility bills and on the City website.
3. Participated in the Arizona Fair Housing Partnership and sponsored a Fair Housing event in spring of each year.
4. Distributed fair housing referral information and encouraged complainants to contact the Arizona Attorney General’s Office, HUD, or the Southwest Fair Housing Council.
5. Ensured that the Fair Housing Logo is displayed on business, cards, and brochures and in program marketing information.
6. Each April distributed a flyer through the City of Flagstaff utility bill announcing April as Fair Housing Month. Included in the flyer information regarding Fair Housing, Fair Housing services, and who to call for more information.
7. Annually sponsored fair housing training for Flagstaff residents, networking with nonprofit, neighborhood-based, faith organizations and education institutions to reach a broad audience, including minority populations, people residing in areas of minority concentration, and people with disabilities. Included information regarding landlord/tenant issues, disability accessibility in training.
8. Through sign-in sheets, tracked the volume of residents, landlords and industry stakeholders participating in community education activities.

9. Continued to display fair housing posters and make fair housing materials available in Flagstaff public facilities and to nonprofit and faith-based organizations.
10. Continually encouraged minority and lower-income households to seek housing counseling from HUD-certified housing counseling agencies. Provided information to housing counseling agencies to assist them in educating minority and lower-income households regarding the range of housing options in Flagstaff, including those outside of minority and low-income concentration areas.
11. Supported agencies in identifying and pursuing federal, state, and private resources that may be targeted to assist households to remain in their homes, particularly households in minority and low-income concentration areas.
12. Continued to work with the Arizona Fair Housing Partnership to discourage predatory lending and other discriminatory practices in the City of Flagstaff.
13. Continually encouraged the development of housing accessible to or adaptable for persons with disabilities in federally-funded projects.
14. Maintained a log of potential fair housing complaints or concerns, including those seemingly related only to landlord-tenant concerns developed in 2012.
15. Inserted a business card with local contact information in the distributed fair housing brochures.
16. Maintained the City's Fair Housing website with links to the Southwest Fair Housing Council and HUD.
17. The Building Official for the City of Flagstaff performed the duties of the ADA Accessibility Specialist for the Community Development Department.

The following actions were identified to address impediments and met with mixed success:

1. The City made efforts to strengthen the relationship with the Arizona Multi-family Housing Association to reach additional landlords and apartment managers (including small landlords) by including the Association in the zoning code rewrite and property maintenance ordinance meetings.
2. The City did not contact the Arizona Attorney General's Office, US Department of Housing and Urban Development or the Southwest Fair Housing Council to track the number of fair housing calls, complaints and actions taken by those agencies.

2021 Impediments to Fair Housing Choice and Plan of Action

Demographic Indicators Summary

- According to the 2015/2019 ACS 78% of the City's population is White, compared with 73% in 2008 and 79% in 2000. The Native American population comprised 8% of the population in 2019, compared with 13% in 2015. The population identifying as another race, including 2 or more races is just 8%, compared with 12% in 2015. Among all races, 19% of the population is Hispanic or Latino, a 1% difference of the population in 2015.
- The City of Flagstaff comprises 51% of the Coconino County population and, with the exception of the Native American population, includes 80% of racial and ethnic minorities in the County. 80% or more of the County's Black/African American and Asian population lives in Flagstaff, as does nearly 70% of the population of another race, including two races.
- Income by family type and race/ethnicity. Compared to the State of Arizona, minority households in Flagstaff experience a proportionately higher median income, yet the median income of minority households in Flagstaff varies: Asian, Black/African American and Native American households are more likely to be extremely low income than are White households; Pacific Islander, Asian and Hispanic households are more likely to be low income than are White households; and Native American and Hispanic households are more likely to be moderate income than are White households.
- Disability and Poverty. The City of Flagstaff's population with disabilities experiences a rate of poverty more than double the population without disabilities – 51.2% compared to 24.5% for the overall population. 1,932 people with disabilities in Flagstaff live below the poverty level.
- Housing problems by race/ethnicity and tenure. Housing cost burden disproportionately impacts minority owners and renters; lower income Black/African American, Asian, and Hispanic owners are more likely than White owners to have housing problems. Housing cost burden is disproportionately high among Black/African American households with income < 30% AMI and Pacific Islander households with income 30% to 50% AMI; many of these households are student households.

Geographic Concentrations Summary

- Low-income concentrations. There are 26 Census Block Groups with a disproportionately high percentage of low and moderate income households. For the purposes of the AI, disproportionately high is defined as at least 10% higher than the City. Considering Census Tracts there are 7 Census Tracts where low-income populations are concentrated – Census Tracts 2, 3, 5, 8, 10, 12 and 15.
- Minority concentrations. There are 18 Census Block Groups in Flagstaff that are areas of minority concentration based on 2010 Census data. Considering Census Tracts there are 5 Census Tracts where minority populations are concentrated – Census Tracts 3, 4, 5, 8, and 11.02. Census Tracts 3, 5 and 8 are also low-income concentration areas.
- Disability concentrations. Areas where the proportion of persons with disabilities is at least 10% higher than citywide are Census Tracts 2 and 4.
- Loan denial and high-cost loan concentrations. Home Mortgage Disclosure Act data suggests a correlation of home purchase loan denial and higher cost loans in LMI and minority concentration tracts.

- Tenure concentrations. There are high concentrations of renters in 14 Census Block Groups; all but one of these Block Groups includes or is adjacent to NAU.

Community Outreach Summary

- Survey respondents who know someone who experienced housing discrimination or believe that housing discrimination is occurring identified the most common types of housing discrimination as 1) refusing or discouraging to rent an apartment or buy a home, or charging more to rent an apartment or buy a home and 2) steering and 3) Discrimination based on disability.
- Over 40% of survey respondents indicated they did not feel very informed about housing discrimination and no interviewees were able to identify more than a few protected classes.
- Survey respondents and interviewees demonstrated confusion over the fair housing complaint process, with most citing the City of Flagstaff as the primary referral source for fair housing complaints. This confusion is a barrier to complainants accessing the fair housing complaint system.
- Both survey respondents and interviewees suggested that affordable housing is a larger issue than fair housing, and fair housing should be incorporated into any affordable housing plan.
- Nearly half of interviewees indicated that fair housing education and training was most needed, and half stated they would attend additional training if offered by the City. However relatively low participation rates by interviewees in prior training opportunities suggests that alternate education and training opportunities would be beneficial to reaching a broader audience.
- While the majority of interviewees agreed that Fair Housing laws are useful, few stated that the laws were easy to follow, suggesting that easy-to-understand materials are essential to increasing awareness and understanding of Fair Housing laws.

Identified Impediments to Fair Housing Choice

1. **Community Education.** The number and nature of fair housing complaints in Flagstaff is low, yet the results of the community survey, public forum and community interviews indicate that there is a need for continued outreach and education. Outreach to both industry stakeholders and residents is needed to ensure a broad understanding of Fair Housing.
 - a. 42% of survey respondents are either not very informed or only somewhat informed about housing discrimination.
 - b. 33% of survey respondents do not know where to report a housing discrimination complaint.
 - c. While 54% of survey respondents indicated they believe housing discrimination is occurring or likely occurring in Flagstaff and 61% indicated they would report housing discrimination if they encountered it, there were only 13 complaints filed between 2016 and 2020.
2. **Minority and Low-income Areas of Concentration.** Concentrations of both minorities and low-income households exist in four Census Tracts.
 - LMI Concentration = at least 51% of population has income below 80% AMI.
 - Census Tracts 2, 3, 5, 8, 10, 12, and 15.
 - Minority Concentration = proportion of minorities at least 10% higher than the Citywide proportion.

- Census Tracts 3, 4, 5, 8 and 11.02.
 - Four Census Tracts that are both areas of low income and minority concentration.
 - Census Tract 3, 4, 5, and 8.
 - The City's minority population continues to grow.
 - In 2011, racial and ethnic minorities represented 27% of the population, up from 26% of the population in 2008 and 21% in 2000.
 - Northern Arizona University students represented 22% of the City's minority population in 2011, including 43% of the Black/African American population and 100% of the Pacific Islander population.
3. **Disability Accessibility.** Testing data from Southwest Fair Housing Council indicates that housing discrimination on the basis of disability is more likely to be supported. Complaint data from Southwest Fair Housing Council and the US Department of Housing and Urban Development indicate a higher volume of complaints based on disability.
- i. 11 of 13 fair housing complaints reported by HUD in Flagstaff were regarding disability.
 - ii. 14 of 15 complaints reported by SWFHC were regarding disability.
 - iii. Majority (14) were rental housing
4. **Housing Choice.** Affordability is an indirect aspect of housing discrimination. The Fair Housing survey indicated a lack of affordable housing leading to a lack of Housing Choice.
- i. While housing choice voucher usage is an option for low-income renters, the program has a long wait-list and many landlords are unwilling to accept vouchers due to existing societal stigmas.
 - ii. Community survey results, especially among Flagstaff LMI residents, indicate a lack of affordable housing as well as a shortage of landlords and property management organizations willing to accept Housing Choice Vouchers limiting LMI resident's choice in housing.
 - iii. Lack of affordable housing supply for large households, which disproportionately impacts minorities, low-income households, and families with large households
 - iv. Lack of affordable housing supply, particularly for low-income special needs households and persons with disabilities.
 - v. "Not in My Backyard" Residents in some neighborhoods designate a new development (e.g. shelter, affordable housing, group home) or change in occupancy of an existing development as inappropriate or unwanted for their local area.

2021 Fair Housing Action Plan

2021 FAIR HOUSING ACTION PLAN	
Impediment	Action Plan
<p>Impediment #1 - Community Education. The number and nature of fair housing complaints in Flagstaff is low, yet the results of the community survey and interviews and public forum indicate there is a need for more outreach and education. Industry stakeholders are more likely to participate in community education activities and additional effort is essential to reach residents and provide information about the Fair Housing reporting process.</p>	<ol style="list-style-type: none"> 1. Each April, reach out to stakeholders, residents, and the community at large to announce April as Fair Housing Month. Include information regarding Fair Housing, Fair Housing services, and who to call for more information. 2. Annually sponsor fair housing training for Flagstaff residents, networking with landlords and property managers, nonprofit, neighborhood-based, faith organizations and education institutions to reach a broad audience. Include information regarding landlord/tenant issues in training. 3. Through sign-in sheets, track the volume of residents, landlords and industry stakeholders participating in community education activities. 4. Maintain a Fair Housing page on the City of Flagstaff website and include direct links to the HUD Fair Housing website and the Arizona Attorney General Civil Rights Division website. 5. Continue to display fair housing posters and make fair housing materials available in Flagstaff public facilities and to nonprofit and faith-based organizations. 6. Sponsor no less than 3 Fair Housing trainings annually target both housing sector stakeholders and community residents with a focus on: <ol style="list-style-type: none"> a. Disability accessibility b. Rentals and the use of Criminal Records in housing c. Extended protections under Sex/Gender d. Emotional support animals
<p>Impediment #2. Minority and Low-income Areas of Concentration. Concentrations of minorities and low-income households exist, and the City's minority population continues to grow.</p>	<ol style="list-style-type: none"> 1. Continue to distribute fair housing brochures in both English and Spanish. 2. Continually encourage minority and lower-income households to seek housing counseling from HUD-certified housing counseling agencies. Provide information to housing counseling agencies to assist them in educating minority and lower-income households regarding the range of housing options in Flagstaff, including those outside of minority and low-income concentration areas. 3. Annually sponsor fair housing training for Flagstaff residents, networking with nonprofit, neighborhood-based and faith organizations and education institutions to reach out to minority populations and areas of minority concentration. 4. Update the City's Incentives for Affordable Housing to encourage developers to provide Affordable and Accessible Units in a variety of locations to decrease area concentration

2021 FAIR HOUSING ACTION PLAN	
Impediment	Action Plan
<p>Impediment #3 - Disability Accessibility. The majority of fair housing complaints reported by Southwest Fair Housing Council and the United States Department of Housing and Urban Development were regarding disability. Increased support and awareness are needed to identify and address housing discrimination, including that directed towards accessibility for persons with disabilities.</p>	<ol style="list-style-type: none"> 1. Continually encourage the development of housing accessible to or adaptable for persons with disabilities in federally-funded projects. 2. Annually sponsor fair housing training for Flagstaff residents, networking with nonprofit, neighborhood-based and faith organizations and education institutions to reach out to persons with disabilities. 3. Ensure that education and outreach activities include information regarding housing accessibility and adaptability for persons with disabilities. 4. Prioritize funding for owner and renter occupied housing rehabilitation to provide disabled LMI accessibility adaptations with deferred loans and grants and incentivize rental occupied housing rehabilitation programs for landlords adapting units for accessibility
<p>Impediment #4 – Housing Choice. Affordability is an indirect aspect of housing discrimination. The Fair Housing survey indicated a lack of affordable housing leading to a lack of Housing Choice. While housing choice voucher usage is an option for low-income renters, the program has a long wait-list and many landlords are unwilling to accept vouchers due to existing societal stigmas.</p>	<ol style="list-style-type: none"> 1. Provide education for and consider incentivizing acceptance of HCV among landlords. 2. Continually encourage the development of housing accessible to or adaptable for persons with disabilities in federally-funded projects. 3. Ensure that education and outreach activities include information regarding housing accessibility and adaptability for persons with disabilities. 4. Develop a comprehensive Housing Plan for the City of Flagstaff including information on Fair Housing, Housing Choice, and efforts to increase affordable and accessible housing units 5. Update the City's Incentives for Affordable Housing to encourage developers to provide Affordable and Accessible Units in a variety of locations to decrease area concentration 6. Consider a media campaign to combat NIMBY (Not in My Backyard) attitudes.

Appendix A – Resident Survey

Illegal housing discrimination occurs when one or more of the following occurs based on a person's race, national origin, color, religion, sex, or if they have children or a disability:

<p>A.</p> <p>Refusing, discouraging or charging more to rent an apartment or buy a home.</p>	<p>B.</p> <p>Discouraging a person from living where he or she wants to live, often by steering him or her to another apartment, complex or neighborhood.</p>	<p>C.</p> <p>Refusing or making it hard to get a loan to buy or refinance a house or take out home equity by doing things like charging more money or offering a worse deal than someone should be able to get if he or she shopped around.</p>	<p>D.</p> <p>Refusing, discouraging or charging more for home insurance.</p>	<p>E.</p> <p>Discrimination based on disability: Refusing to make a reasonable accommodation for a person with a disability, refusing to allow a modification to make an apartment more accessible for a person with a disability or lack of accessible units.</p>	<p>F.</p> <p>Predatory lending: unfair, misleading, deceptive or fraudulent loan practices.</p>
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1. Have you or someone you know ever encountered one or more forms of housing discrimination described in the blue boxes in your local area?

- ☐ Yes, I have or I know someone who has.
- ☐ I think I may have or I may know someone who has.
- ☐ No, I have not and don't know anyone who has.
- ☐ Don't know
- ☐ Other _____

2. If you believe that you or someone you know encountered housing discrimination in your local area, please write down the letters from the shaded boxes at the beginning of the survey that best describes the type of discrimination. *

3. Do you believe housing discrimination occurs in your local area?

- ☐ Yes
- ☐ Likely
- ☐ Unlikely
- ☐ No

4. If you think housing discrimination is occurring in your local area, what types do you think are most prevalent? Write down the letters from the shaded boxes at the beginning of the survey that best describes the type of discrimination.

5. How well informed are you about housing discrimination?

- ☐ Very informed
- ☐ Somewhat informed
- ☐ Not very informed
- ☐ Not at all informed

6. What would you do if you encountered housing discrimination?

- ☐ Do nothing and seek other housing options
- ☐ Tell the person that you believe they are discriminating
- ☐ Report it
- ☐ Would not know what to do
- ☐ Other _____

7. If you wanted to report housing discrimination, who would you report it to?

8. What do you think should be done to help prevent housing discrimination?

Please tell us about you. Answering these questions is optional

Race/Ethnicity <input type="checkbox"/> White Anglo <input type="checkbox"/> Hispanic <input type="checkbox"/> African American <input type="checkbox"/> Native American <input type="checkbox"/> Other _____	Gender <input type="checkbox"/> Female <input type="checkbox"/> Male	Family Status <input type="checkbox"/> Have children in household <input type="checkbox"/> No children in household	Number of People In Your Household <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5+	Annual Household Income <input type="checkbox"/> < \$25,000 <input type="checkbox"/> \$25,000-\$49,999 <input type="checkbox"/> \$50,000-\$74,999 <input type="checkbox"/> \$75,000-\$100,000 <input type="checkbox"/> \$100,000 or more
Do you or a household member have a disability? <input type="checkbox"/> Yes <input type="checkbox"/> No	Current Housing <input type="checkbox"/> Rent <input type="checkbox"/> Own <input type="checkbox"/> Other	Employment <input type="checkbox"/> Public Sector <input type="checkbox"/> Private Sector <input type="checkbox"/> Nonprofit Sector <input type="checkbox"/> Not Employed <input type="checkbox"/> Other _____		Zip Code <input type="checkbox"/> 86001 <input type="checkbox"/> 86002 <input type="checkbox"/> 86003 <input type="checkbox"/> 86004 <input type="checkbox"/> 86011 Other _____

Hay discriminación ilegal en la vivienda cuando ocurren uno o más de los siguientes basados en la raza, origen nacional, color, religión o sexo de una persona, o tener hijos o tener una discapacidad:

<p>A.</p> <p>Rehusar, desanimar o cobrar más por la renta de un apartamento o la compra de una casa.</p>	<p>B.</p> <p>Desanimar a una persona a vivir en donde él o ella desea vivir, frecuentemente guiando a la persona hacia otro apartamento, complejo o vecindario.</p>	<p>C.</p> <p>Rehusar o dificultar la obtención de un préstamo para comprar o refinanciar una casa o remover plusvalía haciendo cosas como cobrar más dinero u ofrecer un trato peor de lo que una persona podría obtener si él o ella comparara precios.</p>	<p>D.</p> <p>Rehusar, desanimar o cobrar más por el seguro de la casa.</p>	<p>E.</p> <p>Discriminación en base a discapacidad: Rehusar hacer una acomodación razonable, rehusar permiso para una modificación que haga un apartamento más accesible para personas con discapacidad, o falta de unidades accesibles.</p>	<p>F.</p> <p>Préstamos depredadores: prácticas de préstamo injustas, engañosas o fraudulentas.</p>
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1. ¿Ha encontrado usted o una persona conocida en su área local una o más formas de discriminación en la vivienda descritas en las casillas sombreadas?

- ☐ Sí, he encontrado o conozco alguien que ha encontrado
- ☐ Creo que podría haber encontrado o podría conocer a alguien que ha encontrado
- ☐ No, no he encontrado ni conozco a nadie que haya encontrado
- ☐ No lo sé
- ☐ Otro _____

2. Si usted cree que usted o una persona conocida encontró discriminación en la vivienda en su área local, por favor escriba la(s) letra(s) de las casillas sombreadas al inicio de la encuesta que mejor describa(n) el tipo de discriminación.

3. ¿Cree usted que la discriminación en la viviendas ocurre en su área local?

- ☐ Sí
- ☐ Es probable
- ☐ No es probable
- ☐ No

4. Si usted cree que ocurre discriminación en la vivienda en su área local, ¿qué tipos cree usted que son más frecuentes? Escriba la(s) letra(s) de las casillas sombreadas al inicio de la encuesta.

5. ¿Está usted bien informado acerca de discriminación en la vivienda?

- ☐ Bien informado
- ☐ Un tanto informado
- ☐ No muy informado
- ☐ No informado para nada

6. ¿Qué haría usted si encontrara discriminación en la vivienda?

- ☐ No hacer nada y buscar otras opciones de vivienda
- ☐ Decirle a la persona que usted cree que están discriminando
- ☐ Reportarlo
- ☐ No sabría qué hacer
- ☐ Otro _____

7. Si usted quisiera reportar discriminación en la vivienda, ¿a quién reportaría?

8. ¿Qué piensa usted que debiera hacerse para ayudar a prevenir la discriminación en la vivienda?

Por favor marque los que se aplican a usted

Raza/Origen étnico <input type="checkbox"/> Blanco Anglo <input type="checkbox"/> Hispano <input type="checkbox"/> Afroamericano <input type="checkbox"/> Indígena Americano <input type="checkbox"/> Otro _____	Sexo <input type="checkbox"/> Femenino <input type="checkbox"/> Masculino	Estado Familiar <input type="checkbox"/> Tiene hijos en casa <input type="checkbox"/> No tiene hijos en casa	Número de personas en la familia 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5+	Los ingresos anuales de la familia <input type="checkbox"/> < \$25,000 <input type="checkbox"/> \$25,000-\$49,999 <input type="checkbox"/> \$50,000-\$74,999 <input type="checkbox"/> \$75,000-\$100,000 <input type="checkbox"/> \$100,000 or more
¿Discapacitado? <input type="checkbox"/> Sí <input type="checkbox"/> No	Vivienda <input type="checkbox"/> Soy propietario de una casa <input type="checkbox"/> Estoy rentando <input type="checkbox"/> Otro _____	Tiene empleo en <input type="checkbox"/> El sector público <input type="checkbox"/> El sector no lucrativo <input type="checkbox"/> El sector privado <input type="checkbox"/> La industria de la vivienda <input type="checkbox"/> No tiene empleo <input type="checkbox"/> Otro _____	Código postal <input type="checkbox"/> 86001 <input type="checkbox"/> 86002 <input type="checkbox"/> 86003 <input type="checkbox"/> 86004 <input type="checkbox"/> 86011 <input type="checkbox"/> Otro _____	

Appendix B – Summary of Federal Fair Housing Act and Presidential Executive Orders

The US Department of Justice provides the following summary of the Federal Fair Housing Act, 42 U.S.C. 3601 et seq. The Fair Housing Act prohibits discrimination by direct providers of housing, such as landlords and real estate companies as well as other entities, such as municipalities, banks or other lending institutions and homeowners insurance companies whose discriminatory practices make housing unavailable to persons because of:

- race or color
- religion
- sex
- national origin
- familial status, or
- disability.

In cases involving discrimination in mortgage loans or home improvement loans, the Department may file suit under both the Fair Housing Act and the Equal Credit Opportunity Act. Under the Fair Housing Act, the Department of Justice may bring lawsuits where there is reason to believe that a person or entity is engaged in a "pattern or practice" of discrimination or where a denial of rights to a group of persons raises an issue of general public importance. Where force or threat of force is used to deny or interfere with fair housing rights, the Department of Justice may institute criminal proceedings. The Fair Housing Act also provides procedures for handling individual complaints of discrimination. Individuals who believe that they have been victims of an illegal housing practice may file a complaint with the Department of Housing and Urban Development [HUD] or file their own lawsuit in federal or state court. The Department of Justice brings suits on behalf of individuals based on referrals from HUD.

Discrimination in Housing Based Upon Race or Color

One of the central objectives of the Fair Housing Act, when Congress enacted it in 1968, was to prohibit race discrimination in sales and rentals of housing. Nevertheless, more than 30 years later, race discrimination in housing continues to be a problem. The majority of the Justice Department's pattern or practice cases involve claims of race discrimination. Sometimes, housing providers try to disguise their discrimination by giving false information about availability of housing, either saying that nothing was available or steering homeseekers to certain areas based on race. Individuals who receive such false information or misdirection may have no knowledge that they have been victims of discrimination. The Department of Justice has brought many cases alleging this kind of discrimination based on race or color. In addition, the Department's Fair Housing Testing Program seeks to uncover this kind of hidden discrimination and hold those responsible accountable. Most of the mortgage lending cases brought by the Department under the Fair Housing Act and Equal Credit Opportunity Act alleged discrimination based on race or color. Some of the Department's cases have also alleged that municipalities and other local government entities violated the Fair Housing Act when they denied permits or zoning changes for housing developments, or relegated them to predominantly minority neighborhoods, because the prospective residents were expected to be predominantly African-Americans.

Discrimination in Housing Based Upon Religion

The Fair Housing Act prohibits discrimination in housing based upon religion. This prohibition covers instances of overt discrimination against members of a particular religion as well less direct actions, such as zoning ordinances designed to limit the use of private homes as a places of worship. The number of cases filed since 1968 alleging religious discrimination is small in comparison to some of the other prohibited bases, such as race or national origin. The Act does contain a limited exception that allows non-commercial housing operated by a religious organization to reserve such housing to persons of the same religion.

Discrimination in Housing Based Upon Sex, Including Sexual Harassment

The Fair Housing Act makes it unlawful to discriminate in housing on the basis of sex. In recent years, the Department's focus in this area has been to challenge sexual harassment in housing. Women, particularly those who are poor, and with limited housing options, often have little recourse but to tolerate the humiliation and degradation of sexual harassment or risk having their families and themselves removed from their homes. The Department's enforcement program is aimed at landlords who create an untenable living environment by demanding sexual favors from tenants or by creating a sexually hostile environment for them. In this manner we seek both to obtain relief for tenants who have been treated unfairly by a landlord because of sex and also deter other potential abusers by making it clear that they cannot continue their conduct without facing repercussions. In addition, pricing discrimination in mortgage lending may also adversely affect women, particularly minority women. This type of discrimination is unlawful under both the Fair Housing Act and Equal Credit Opportunity Act.

Discrimination in Housing Based Upon National Origin

The Fair Housing Act prohibits discrimination based upon national origin. Such discrimination can be based either upon the country of an individual's birth or where his or her ancestors originated. Census data indicate that the Hispanic population is the fastest growing segment of our nation's population. The Justice Department has taken enforcement action against municipal governments that have tried to reduce or limit the number of Hispanic families that may live in their communities. We have sued lenders under both the Fair Housing Act and the Equal Credit Opportunity Act when they have imposed more stringent underwriting standards on home loans or made loans on less favorable terms for Hispanic borrowers. The Department has also sued lenders for discrimination against Native Americans. Other areas of the country have experienced an increasing diversity of national origin groups within their populations. This includes new immigrants from Southeastern Asia, such as the Hmong, the former Soviet Union, and other portions of Eastern Europe. We have taken action against private landlords who have discriminated against such individuals.

Discrimination in Housing Based Upon Familial Status

The Fair Housing Act, with some exceptions, prohibits discrimination in housing against families with children under age 18. In addition to prohibiting an outright denial of housing to families with children, the Act also prevents housing providers from imposing any special requirements or conditions on tenants with custody of children. For example, landlords may not locate families with children in any single portion of a complex, place an unreasonable restriction on the total number of persons who may reside in a dwelling, or limit their access to recreational services provided to other tenants. In most instances, the amended Fair Housing Act prohibits a housing provider from refusing to rent or sell to families with children. However, some facilities may be designated as Housing for Older Persons (55 years of age). This type of housing, which meets the standards set forth in the Housing for Older Persons Act of 1995, may operate as "senior" housing. The Department of Housing and Urban Development (HUD) has published regulations and additional guidance detailing these statutory requirements.

Discrimination in Housing Based Upon Disability

The Fair Housing Act prohibits discrimination on the basis of disability in all types of housing transactions. The Act defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life activities. The term mental or physical impairment may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activity may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working. The Fair Housing Act also protects persons who have a record of such impairment or are regarded as having such

impairment. Current users of illegal controlled substances, persons convicted for illegal manufacture or distribution of a controlled substance, sex offenders, and juvenile offenders are not considered disabled under the Fair Housing Act, by virtue of that status. The Fair Housing Act affords no protections to individuals with or without disabilities who present a direct threat to the persons or property of others. Determining whether someone poses such a direct threat must be made on an individualized basis, however, and cannot be based on general assumptions or speculation about the nature of a disability. The Division's enforcement of the Fair Housing Act's protections for persons with disabilities has concentrated on two major areas. One is insuring that zoning and other regulations concerning land use are not employed to hinder the residential choices of these individuals, including unnecessarily restricting communal, or congregate, residential arrangements, such as group homes. The second area is insuring that newly constructed multifamily housing is built in accordance with the Fair Housing Act's accessibility requirements so that it is accessible to and usable by people with disabilities, and, in particular, those who use wheelchairs. There are other federal statutes that prohibit discrimination against individuals with disabilities, including the Americans with Disabilities Act, which is enforced by the Disability Rights Section of the Civil Rights Division.

Discrimination in Housing Based Upon Disability Group Homes

Some individuals with disabilities may live together in congregate living arrangements, often referred to as "group homes." The Fair Housing Act prohibits municipalities and other local government entities from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against individuals with disabilities. The Fair Housing Act makes it unlawful --

- To utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of non-disabled persons. An example would be an ordinance prohibiting housing for persons with disabilities or a specific type of disability, such as mental illness, from locating in a particular area, while allowing other groups of unrelated individuals to live together in that area.
- To take action against, or deny a permit, for a home because of the disability of individuals who live or would live there. An example would be denying a building permit for a home because it was intended to provide housing for persons with mental retardation.
- To refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing. What constitutes a reasonable accommodation is a case-by-case determination. Not all requested modifications of rules or policies are reasonable. If a requested modification imposes an undue financial or administrative burden on a local government, or if a modification creates a fundamental alteration in a local government's land use and zoning scheme, it is not a "reasonable" accommodation.

There has been a significant amount of litigation concerning the ability of local government to exercise control over group living arrangements, particularly for persons with disabilities. To provide guidance on these issues, the Departments of Justice and Housing and Urban Development issued a Joint Statement on Group Homes, Local Land Use and the Fair Housing Act.

Discrimination in Housing Based Upon Disability -- Accessibility Features for New Construction

The Fair Housing Act defines discrimination in housing against persons with disabilities to include a failure "to design and construct" certain new multi-family dwellings so that they are accessible to and usable by persons with disabilities, and particularly people who use wheelchairs. The Act requires all newly constructed multi-family dwellings of four or more units intended for first occupancy after March 13, 1991 to have certain features: an accessible entrance on an accessible route, accessible common and public use areas, doors sufficiently wide to

accommodate wheelchairs, accessible routes into and through each dwelling, light switches, electrical outlets, and thermostats in accessible location, reinforcements in bathroom walls to accommodate grab bar installations, and usable kitchens and bathrooms configured so that a wheelchair can maneuver about the space.

Developers, builders, owners, and architects responsible for the design or construction of new multi-family housing may be held liable under the Fair Housing Act if their buildings fail to meet these design requirements. The Department of Justice has brought many enforcement actions against those who failed to do so. Most of the cases have been resolved by consent decrees providing a variety of types of relief, including: retrofitting to bring inaccessible features into compliance where feasible and where it is not -- alternatives (monetary funds or other construction requirements) that will provide for making other housing units accessible; training on the accessibility requirements for those involved in the construction process; a mandate that all new housing projects comply with the accessibility requirements, and monetary relief for those injured by the violations. In addition, the Department has sought to promote accessibility through building codes.

Other Federal Laws

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

Fair Housing-Related Presidential Executive Orders:

- [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 11246](#), as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.
- [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](#) 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](#) 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 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.

Attachment 1 – Arizona Fair Housing Act

41-1491. Definitions

In this article, unless the context otherwise requires:

1. "Aggrieved person" includes any person who either:
 - (a) Claims to have been injured by a discriminatory housing practice.
 - (b) Believes that he will be injured by a discriminatory housing practice that is about to occur.
2. "Complainant" means a person, including the attorney general, who files a complaint under section 41-1491.22.
3. "Conciliation" means the attempted resolution of issues raised by a complaint or by the investigation of the complaint through informal negotiations involving the aggrieved person, the respondent and the attorney general.
4. "Conciliation agreement" means a written agreement setting forth the resolution of the issues in conciliation.
5. "Disability" means a mental or physical impairment that substantially limits at least one major life activity, a record of such an impairment or being regarded as having such an impairment. Disability does not include current illegal use of or addiction to any drug or illegal or federally controlled substance. Disability shall be defined and construed as the term is defined and construed by the Americans with disabilities act of 1990 (P.L. 101-336) and the ADA amendments act of 2008 (P.L. 110-325; 122 Stat. 3553).
6. "Discriminatory housing practice" means an act prohibited by sections 41-1491.14 through 41-1491.21.
7. "Dwelling" means either:
 - (a) Any building, structure or part of a building or structure that is occupied as, or designed or intended for occupancy as, a residence by one or more families.
 - (b) Any vacant land that is offered for sale or lease for the construction or location of a building, structure or part of a building or structure described by subdivision (a) of this paragraph.
8. "Family" includes a single individual.
9. "Person" means one or more individuals, corporations, partnerships, associations, labor organizations, legal representatives, mutual companies, joint stock companies, trusts, unincorporated organizations, trustees, receivers, fiduciaries, banks, credit unions and financial institutions.
10. "Respondent" means either:
 - (a) The person accused of a violation of this article in a complaint of a discriminatory housing practice.
 - (b) Any person identified as an additional or substitute respondent under section 41-1491.25 or an agent of an additional or substitute respondent.
11. "To rent" includes to lease, to sublease, to let or to otherwise grant for a consideration the right to occupy premises not owned by the occupant.

41-1491.01. Discrimination due to familial status

In this article, a discriminatory act is committed because of familial status if the act is committed because the person who is the subject of discrimination is:

1. Pregnant.
2. Domiciled with an individual younger than eighteen years of age in regard to whom the person either:
 - (a) Is the parent or legal custodian.
 - (b) Has the written permission of the parent or legal custodian for domicile with that person.
3. In the process of obtaining legal custody of an individual younger than eighteen years of age.

41-1491.02. Exempt sales and rentals

A. Except as provided in subsection B of this section, sections 41-1491.14 through 41-1491.21 do not apply to:

1. The sale or rental of a single family house sold or rented by an owner if:

(a) The owner does not:

(i) Own more than three single family houses at any one time.

(ii) Own any interest in, nor is there owned or reserved on his behalf, under any express or voluntary agreement, title to or any right to any part of the proceeds from the sale or rental of more than three single family houses at any one time.

(b) The house was sold or rented without either:

(i) The use of the sales or rental facilities or services of a real estate broker, agent or salesman licensed under title 32, chapter 20 or the use of an employee or agent of a licensed broker, agent or salesman or the facilities or services of the owner of a dwelling designed or intended for occupancy by five or more families.

(ii) The publication, posting or mailing of a notice, statement or advertisement prohibited by section 41-1491.15.

2. The sale or rental of rooms or units in a dwelling containing living quarters occupied or intended to be occupied by no more than four families living independently of each other if the owner maintains and occupies one of the living quarters as the owner's residence.

B. The exemption in subsection A, paragraph 1 of this section applies to only one sale or rental in a twenty-four month period if the owner was not the most recent resident of the house at the time of the sale or rental.

41-1491.03. Religious organization and private club exemption

A. This article does not prohibit a religious organization, association or society or a nonprofit institution or organization operated, supervised or controlled by or in conjunction with a religious organization, association or society from:

1. Limiting the sale, rental or occupancy of dwellings that it owns or operates for other than a commercial purpose to persons of the same religion.

2. Giving preference to persons of the same religion, unless membership in the religion is restricted because of race, color or national origin.

B. This article does not prohibit a private club that is not open to the public and that, as an incident to its primary purpose, provides lodging that it owns or operates for other than a commercial purpose from limiting the rental or occupancy of that lodging to its members or from giving preference to its members.

41-1491.04. Housing for older persons exempted; rules; liability; definition

A. The provisions of this article relating to familial status do not apply to housing for older persons.

B. The attorney general may adopt rules setting forth criteria for housing for older persons. The rules adopted for subsection D, paragraph 3 shall require the following factors:

1. That at least eighty per cent of the units are occupied by at least one person fifty-five years of age or older per unit. Rules adopted for verification of occupancy shall provide for the use of reliable surveys and affidavits. These surveys and affidavits are admissible in administrative and judicial proceedings. Rules adopted establishing compliance with this paragraph shall be consistent with federal fair housing regulations.

2. The publication of, and adherence to, policies and procedures that demonstrate an intent by the owner or manager to provide housing for persons fifty-five years of age or older. Rules adopted establishing compliance with this paragraph shall be consistent with federal fair housing regulations.

C. A person shall not be held personally liable for monetary damages under section 41-1491.31 if the

person relied in good faith that the housing was exempt from this article because it was housing for older persons as defined under subsection D, paragraph 3 of this section. For the purposes of this subsection a person may only demonstrate good faith reliance on the exemption from the provisions of this article if both:

1. The person has no actual knowledge that the facility or community does not, or will not qualify as housing for older persons as defined under subsection D, paragraph 3 of this section.
2. The facility or community has formally stated in writing that the facility or community is housing for older persons as defined under subsection D, paragraph 3 of this section.
- D. In this section, "housing for older persons" means housing that meets any of the following conditions:
 1. Is specifically designed and operated to assist elderly persons under a federal or state program.
 2. Is intended for, and solely occupied by, persons sixty-two years of age or older.
 3. Is intended and operated for occupancy by at least one person fifty-five years of age or older per unit

41-1491.05. Appraisal exemption

This article does not prohibit a person engaged in the business of furnishing appraisals of real property from taking into consideration factors other than race, color, religion, sex, disability, familial status or national origin

41-1491.06. Effect on other law

- A. This article does not affect a reasonable local or state restriction on the maximum number of occupants permitted to occupy a dwelling or a restriction relating to health or safety standards.
- B. This article does not affect a requirement of nondiscrimination in any other state or federal law.
- C. Nothing in this article prohibits cities or towns with a population of three hundred fifty thousand or more persons according to the 1990 United States decennial census from enacting ordinances, not later than January 1, 1995, that are substantially equivalent to the provisions of federal law and this article.

41-1491.07.

Administration by attorney general The attorney general shall administer this article.

41-1491.08. Rules

The attorney general may adopt interpretive and procedural rules necessary to implement this article.

41-1491.09. Complaints

The attorney general shall receive, investigate, seek to conciliate and act on complaints alleging violations of this article.

41-1491.10. Reports; studies

- A. The attorney general shall publish annually a written report recommending legislative or other action

to carry out the purposes of this article. This report shall contain, for the preceding fiscal year, the following information:

1. The number of complaints initiated by the attorney general.
 2. The number of complaints filed with the attorney general by aggrieved persons.
 3. The number of complaints dismissed by the attorney general.
 4. The number of complaints that resulted in conciliation agreements.
 5. The number of complaints for which the attorney general found reasonable cause that a discriminatory housing practice occurred or was about to occur.
 6. The number of civil actions filed by the attorney general pursuant to section 41-1491.34.
- B. The report shall include a description of the relief awarded in civil actions and, without attribution, benefits to complainants agreed to in conciliation agreements. The report shall also include the number of instances in the preceding fiscal year, and the reasons therefore, but without attribution to parties, the number of investigations that were not completed within the time periods provided by section 41-1491.24, subsection B or a determination made pursuant to section 41-1491.29, subsection B.
- C. The attorney general may make studies relating to the nature and extent of discriminatory housing practices in this state.

41-1491.11. Cooperation with other entities

The attorney general shall cooperate with federal fair housing agencies and, as appropriate, may provide technical and other assistance to federal, state, local and other public or private entities that are formulating or operating programs to prevent or eliminate discriminatory housing practices. Nothing in this article shall be interpreted as prohibiting a political subdivision of this state from administering fair housing projects or cities or towns with a population of three hundred fifty thousand or more persons according to the 1990 United States decennial census from adopting a fair housing ordinance.

41-1491.12. Subpoenas; discovery

The attorney general may issue subpoenas and compel the production of documents and the giving of testimony, as provided by section 41-1403.

41-1491.13. Referral to city or town

- A. The attorney general may defer proceedings under this article and refer a complaint to a city or town with a population of three hundred fifty thousand or more persons according to the 1990 United States decennial census that has been recognized by the United States department of housing and urban development as having adopted ordinances providing fair housing rights and remedies that are substantially equivalent to those granted under federal law and this article and that has entered into an intergovernmental agreement with the attorney general.
- B. For a city or town with a population of three hundred fifty thousand or more persons according to the 1990 United States decennial census to be eligible to implement the provisions of this article it shall adopt a fair housing ordinance by January 1, 1995.
- C. If the substantial equivalency status is revoked or decertified by the United States department of housing and urban development, the attorney general shall assume sole responsibility for the implementation and enforcement of this article.

41-1491.14. Discrimination in sale or rental

- A. A person may not refuse to sell or rent after a bona fide offer has been made or refuse to

negotiate for the sale or rental of or otherwise make unavailable or deny a dwelling to any person because of race, color, religion, sex, familial status or national origin.

B. A person may not discriminate against any person in the terms, conditions or privileges of sale or rental of a dwelling, or in providing services or facilities in connection with the sale or rental, because of race, color, religion, sex, familial status or national origin.

C. This section does not prohibit discrimination against a person because the person has been convicted under federal law or the law of any state of the illegal manufacture or distribution of a controlled substance.

41-1491.15. Publication of sales or rentals

A person may not make, print or publish or cause to be made, printed or published any notice, statement or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on race, color, religion, sex, disability, familial status or national origin or an intention to make such a preference, limitation or discrimination.

41-1491.16. Inspection of dwelling

A person may not represent to any person because of race, color, religion, sex, disability, familial status or national origin that a dwelling is not available for inspection for sale or rental if the dwelling is available for inspection.

41-1491.17. Entry into neighborhood

A person, for profit, may not induce or attempt to induce a person to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a person of a particular race, color, religion, sex, disability, familial status or national origin.

41-1491.18. Prohibition of intimidation

A person may not coerce, intimidate, threaten or interfere with any person in the exercise or enjoyment of, or having exercised or enjoyed, or on account of his having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by this section and sections 41-1491.14, 41-1491.15, 41-1491.16, 41-1491.17, 41-1491.19, 41-1491.20 and 41-1491.21.

41-1491.19. Discrimination due to disability; definitions

A. A person may not discriminate in the sale or rental or otherwise make unavailable or deny a dwelling to any buyer or renter because of a disability of:

1. That buyer or renter.
2. A person residing in or intending to reside in that dwelling after it is sold, rented or made available.
3. A person associated with that buyer or renter.

B. A person may not discriminate against any person in the terms, conditions or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of a disability of:

1. That person.
2. A person residing in or intending to reside in that dwelling after it is so sold, rented or made available.

3. A person associated with that person.

C. Nothing in this section requires that a dwelling be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.

D. Compliance with the appropriate requirements of the fair housing accessibility guidelines established by the United States department of housing and urban development satisfies the requirements of subsection E, paragraph 3, subdivision (c).

E. For the purposes of this section, "discrimination" includes:

1. A refusal to permit, at the expense of the disabled person, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications may be necessary to afford the person full enjoyment of the premises, provided that, in the case of a renter, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing, to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

2. A refusal to make reasonable accommodations in rules, policies, practices or services if the accommodations may be necessary to afford the person equal opportunity to use and enjoy a dwelling.

3. In connection with the design and construction of covered multifamily dwellings for first occupancy after the date that is thirty months after the date of enactment of the federal fair housing amendments act of 1988 (P.L. 100-430), a failure to design and construct those dwellings in a manner that includes all of the following:

(a) The public use and common use portions of the dwellings are readily accessible to and usable by disabled persons.

(b) All the doors designed to allow passage into and within all premises within the dwellings are sufficiently wide to allow passage by disabled persons in wheelchairs.

(c) All premises within the dwellings contain the following features of adaptive design:

(i) An accessible route into and through the dwelling.

(ii) Light switches, electrical outlets, thermostats and other environmental controls in accessible locations.

(iii) Reinforcements in bathroom walls to allow later installation of grab bars.

(iv) Usable kitchens and bathrooms so that an individual in a wheelchair can maneuver about the space.

F. As used in this section, "covered multifamily dwellings" means buildings consisting of four or more units if the buildings have one or more elevators and ground floor units in other buildings consisting of four or more units.

41-1491.20. Residential real estate related transaction; definition

A. A person whose business includes engaging in residential real estate related transactions may not discriminate against a person in making a real estate related transaction available or in the terms or conditions of a real estate related transaction because of race, color, religion, sex, disability, familial status or national origin.

B. In this section, "residential real estate related transaction" means:

1. Making or purchasing loans or providing other financial assistance either:

(a) To purchase, construct, improve, repair or maintain a dwelling.

(b) To secure residential real estate.

2. Selling, brokering or appraising residential real property.

41-1491.21. Brokerage services

A person may not deny any person access to, or membership or participation in, a multiple listing service, real estate brokers' organization or other service, organization or facility relating to the business

of selling or renting dwellings or may not discriminate against a person in the terms or conditions of access, membership or participation in such an organization, service or facility because of race, color, religion, sex, disability, familial status or national origin.

41-1491.22. Complaints

- A. The attorney general shall investigate alleged discriminatory housing practices. The attorney general, on his own initiative, may file such a complaint.
- B. A complaint shall be in writing, under oath and in the form prescribed by the attorney general.
- C. An aggrieved person may file, not later than one year after an alleged discriminatory housing practice has occurred or terminated, whichever is later, a complaint with the attorney general alleging the discriminatory housing practice.
- D. Not later than one year after an alleged discriminatory housing practice has occurred or terminated, whichever is later, the attorney general may file his own complaint.
- E. A complaint may be amended at any time.
- F. On the filing of a complaint the attorney general shall:
 - 1. Give the aggrieved person notice that the complaint has been received.
 - 2. Advise the aggrieved person of the time limits and choice of forums under this article.
 - 3. Not later than twenty days after the filing of the complaint or the identification of an additional respondent under section 41-1491.25 serve on each respondent:
 - (a) A notice identifying the alleged discriminatory housing practice and advising the respondent of the procedural rights and obligations of a respondent under this article.
 - (b) A copy of the original complaint.
- G. Notices and other documents required to be served under this article may be served as provided by section 41-1403, subsection B, paragraph 4.

41-1491.23. Answer to complaint

- A. Not later than ten days after receipt of the notice and copy under section 41-1491.22, subsection F, paragraph 3, a respondent may file an answer to the complaint.
- B. The answer shall be in writing, under oath and in the form prescribed by the attorney general.
- C. An answer may be amended at any time.
- D. An answer does not inhibit the investigation of a complaint.

41-1491.24. Investigation

- A. If the federal government has referred a complaint to the attorney general or has deferred jurisdiction over the subject matter of the complaint to the attorney general, and if the attorney general has accepted the referral or deferral, the attorney general shall promptly investigate the allegations set forth in the complaint.
- B. The attorney general shall investigate all complaints and, except as provided by subsection C, shall complete an investigation not later than one hundred days after the date the complaint is filed, or if it is unable to complete the investigation within this period, shall dispose of all proceedings related to the investigation not later than one year after the date the complaint is filed.
- C. If the attorney general is unable to complete an investigation within the time periods prescribed by subsection B, the attorney general shall notify the complainant and the respondent in writing of the reasons for the delay.

41-1491.25. Additional or substitute respondent

- A. The attorney general may join a person not named in the complaint as an additional or substitute respondent if in the course of the investigation the attorney general determines that the person should be accused of a discriminatory housing practice.
- B. In addition to the information required in the notice under section 41-1491.22, subsection F, paragraph 3, the attorney general shall include in a notice to a respondent joined under this section an explanation of the basis for the determination that the person is properly joined as a respondent.

41-1491.26. Conciliation

- A. The attorney general shall engage, to the extent feasible, in conciliation, including, if appropriate, mediation, with respect to the complaint.
- B. A conciliation agreement is an agreement between a respondent and the complainant and is subject to approval by the attorney general.
- C. A conciliation agreement may provide for binding arbitration or another method of dispute resolution. Dispute resolution that results from a conciliation agreement may authorize appropriate relief, including monetary relief.
- D. A conciliation agreement shall not be made public unless all parties agree to the disclosure or the attorney general determines that disclosure is necessary to further the purposes of this article.
- E. Nothing said or done in the course of conciliation may be made public or used as evidence in a subsequent proceeding under this article without the written consent of the persons concerned.
- F. Materials in the investigative file may be disclosed to the parties to the extent reasonably necessary to further the investigation or conciliation discussions. Materials in the investigative file may be disclosed to the complainant for the purpose of deciding whether to file a complaint in court and may be disclosed to the respondent for the purpose of formulating its answer. After a court action has been filed, information derived from the investigation and the final investigation report relating to the investigation shall be subject to discovery.

41-1491.27. Temporary or preliminary relief

If the attorney general concludes at any time after the filing of a complaint that prompt judicial action is necessary to carry out the purposes of this article, the attorney general may file a civil action for appropriate temporary or preliminary relief pending final disposition of the complaint.

41-1491.28. Investigative reports

- A. The attorney general shall prepare a final investigative report showing:
1. The names and dates of contacts with witnesses.
 2. A summary of correspondence and other contacts with the aggrieved person and the respondent showing the dates of the correspondence and contacts.
 3. A summary description of other pertinent records.
 4. A summary of witness statements.
 5. Answers to interrogatories.
- B. A final report under this section may be amended if additional evidence is discovered.

41-1491.29. Reasonable cause determination

- A. The attorney general shall determine based on the facts whether reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur.
- B. The attorney general shall make the determination under subsection A of this section not later than

one hundred days after the date a complaint is filed unless either:

1. It is impracticable to make the determination.
2. The attorney general has approved a conciliation agreement relating to the complaint.
- C. If it is impracticable to make the determination within the time period provided by subsection B of this section, the attorney general shall notify the complainant and respondent in writing of the reasons for the delay.
- D. If the attorney general determines that reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur, the attorney general shall attempt for a period of not more than thirty days to effectuate a conciliation agreement. If no conciliation agreement has been reached after thirty days, the attorney general shall file a civil action in superior court, as provided in section 41-1491.34.

E. 41-1491.30. Dismissal of complaint

If the attorney general determines that no reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur, the attorney general shall promptly dismiss the complaint and give written notice of the dismissal to the complainant and respondent.

41-1491.31. Civil action

- A. An aggrieved person may file a civil action in superior court not later than two years after the occurrence of the termination of an alleged discriminatory housing practice or the breach of a conciliation agreement entered into under this article, whichever occurs last, to obtain appropriate relief with respect to the discriminatory housing practice or breach.
- B. The two year period does not include any time elapsed between the filing of any court procedure to enforce an administrative subpoena and is not jurisdictional but is a statute of limitations subject to principles of estoppel, tolling and waiver.
- C. An aggrieved person may file an action under this section whether or not a complaint has been filed under section 41-1491.22 and without regard to the status of any complaint filed under section 41-1491.22. The filing of an action under this section does not affect the attorney general's power and duty to investigate and make determinations based on the aggrieved person's administrative complaint.
- D. If the attorney general has obtained a conciliation agreement with the consent of an aggrieved person, the aggrieved person may not file an action under this section with respect to the alleged discriminatory housing practice that forms the basis for the complaint except to enforce the terms of the agreement.
- E. An aggrieved person may intervene in a civil action filed by the attorney general and based on that person's administrative complaint.
- F. The rights granted by 42 United States Code sections 3603, 3604, 3605 and 3606 may be enforced in any civil action brought pursuant to this section.

41-1491.32. Court appointed attorney

On application by a person alleging a discriminatory housing practice or by a person against whom a discriminatory housing practice is alleged, the superior court may appoint an attorney for the person.

41-1491.33. Relief granted

In an action under section 41-1491.31, if the superior court finds that a discriminatory housing practice has occurred or is about to occur, the court may award to the plaintiff:

1. Actual and punitive damages.
2. Reasonable attorney fees.
3. Court costs.
4. A permanent or temporary injunction, temporary restraining order or other order, including an order enjoining the defendant from engaging in the practice or ordering appropriate affirmative action.

41-1491.34. Civil action by attorney general

- A. If the attorney general finds cause to believe that a discriminatory housing practice has occurred or is about to occur, and there is no conciliation agreement within thirty days, the attorney general shall immediately file a civil action on behalf of the complainant in superior court against the respondent.
- B. If the attorney general finds reasonable cause to believe that a party has breached a conciliation agreement, the attorney general shall file a civil action for enforcement of the agreement.
- C. In an action under this section, the court may award on behalf of the complainant actual and punitive damages and may issue a permanent or temporary injunction, temporary restraining order or other order, including an order enjoining the defendant from engaging in the practice or ordering affirmative action, and may award court costs to the attorney general.
- D. A person aggrieved by the alleged discriminatory housing practice or damaged by the alleged breach of the conciliation agreement may intervene in a civil action brought under this section.

41-1491.35. Pattern or practice cases

- A. The attorney general may file a civil action in superior court for appropriate relief if the attorney general has reasonable cause to believe that either:
1. A person is engaged in a pattern or practice of resistance to the full enjoyment of any right granted by this article.
 2. A person has been denied any right granted by this article and that denial raises an issue of general public importance.
- B. In an action under this section the court may:
1. Award preventive relief, including a permanent or temporary injunction, restraining order or other order against the person responsible for a violation of this article as necessary to assure the full enjoyment of the rights granted by this article.
 2. Award other appropriate relief, including monetary damages, reasonable attorney fees and court costs.
 3. To vindicate the public interest, assess a civil penalty against the respondent in an amount that does not exceed:
 - (a) Fifty thousand dollars for a first violation.
 - (b) One hundred thousand dollars for a second or subsequent violation.

41-1491.36. Prevailing party; fees and costs

A court in a civil action brought under this article shall award reasonable attorney fees and costs to a prevailing plaintiff, except to the attorney general in an action brought under section 41-1491.33. The court shall not award attorney fees to a prevailing defendant unless the plaintiff's complaint was frivolous, unreasonable or without foundation.

41-1491.37. Superior court enforcement; local fair housing

- A. The superior court has jurisdiction to enforce a local fair housing ordinance with provisions

substantially equivalent to the provisions of federal law and this article.

An incorporated city or town with a population of three hundred fifty thousand or more persons according to the 1990 United States decennial census that has a fair housing ordinance may file an action in superior court to enforce

City of Flagstaff

Five-Year Consolidated Plan

July 1, 2021 – June 30, 2026

Submitted to the U.S. Department of
Housing and Urban Development
May 15th, 2021



City of Flagstaff

211 E Birch Ave
Flagstaff, AZ 86004
www.flagstaffaz.gov

ON REQUEST THIS DOCUMENT CAN BE MADE AVAILABLE IN ALTERNATE FORMATS



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Mayor Paul Deasy

Council

Vice-Mayor Becky Daggett

Councilmember Adam Shimoni

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Councilmember Austin Aslan

Councilmember Miranda Sweet

Councilmember Jim McCarthy

City Manager

Greg Clifton

Community Development Director

Dan Folke

Housing Director

Sarah Darr

Consolidated Plan and Analysis of Impediments to Fair Housing Choice

Prepared for: City of Flagstaff Community Development Division

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Executive Summary

1. Introduction

Flagstaff is a City in, and the [county seat](#) of, [Coconino County](#) in northern [Arizona](#), in the southwestern United States. With a 2020 population of **77,590**, it is the **15th largest city in Arizona** and the **459th largest city in the United States**. Flagstaff is currently growing at a rate of **1.67%** annually and its population has increased by **17.79%** since the most recent census, which recorded a population of **65,870** in 2010. Flagstaff reached it's highest estimated population of 77,590 in 2021. Spanning over 66 miles, Flagstaff has a population density of 1,175 people per square mile.

Flagstaff has a notably large Native American population that is about 12x the national average. This is due to Flagstaff's proximity to several Native American reservations such as the Hopi, Yavapai, Navajo, and Havasupai. There are almost 5,500 people of Navajo ancestry in Flagstaff. Flagstaff is a college town, which is reflected in the demographics. Almost 90% of the population has a high school diploma or GED compared to the national average of 80%. More than 39% of the population has a bachelor's degree or higher.

Flagstaff's economy mostly centers on education and tourism, receiving more than 5 million visitors every year. [The City is found near Grand Canyon National Park](#), which supports its thriving tourism industry. The city is also known for its high-tech and science development centers such as the Lowell Observatory, the [United States](#) Geological Survey's Flagstaff campus, and the United States Naval Observatory Flagstaff Station (NOFS)

Flagstaff is [one of the fastest-growing areas of Arizona](#), according to recent census figures. While Phoenix has been losing large numbers to the outlying suburbs, Flagstaff grew more than 4% between 2011 and 2012 alone. Its growth rate was so fast, in fact, that it was the 9th fastest-growing city in the United States at the time. More recently Flagstaff has grown between 1.25% – 2.39% every year since 2012.

According to the most recent (2019) US Census American Community 5 year survey, the racial composition of Flagstaff was:

- White: 78.34%
- Native American: 7.85%
- Two or more races: 5.27%
- Other race: 3.21%
- Asian: 3.08%
- Black or African American: 1.99%
- Native Hawaiian or Pacific Islander: 0.26%

Metropolitan cities with populations of at least 50,000 people are considered Community Development Entitlement Communities. As such, the City of Flagstaff is considered an entitled city and receives an annual grant on a formula basis from the U.S. Department of Housing and Urban Development (HUD) and the Community Development Block Grant Program.

HUD requires that the City submit a Consolidated Plan (ConPlan) every five years to receive Federal grants which provide services and projects that benefit primarily low- and moderate income individuals and households. The Five-Year Consolidated Plan provides the framework for implementation of the City of Flagstaff's mission and goals utilizing Community Development Block Grant (CDBG) funds received from HUD and other funds that may leverage CDBG resources.

Community Development Block Grant funding can be utilized to fund a broad range of eligible activities. The City must determine annually which eligible activities will best serve the needs of the community. The Five-Year Consolidated Plan is designed to guide HUD-funded affordable housing, homelessness, special needs, and community development policies and programs over the five-year period beginning July 1, 2021 and ending June 30, 2026.

The Needs Assessment (NA) and Market Analysis (MA) of the Consolidated Plan provide information about community specific need gathered through several methods, including consultation with local agencies, public outreach, a review of demographic and economic data sets, and a housing market analysis. The Strategic Plan (SP) details how the City will address the priority needs identified during the NA and MA process. The strategies must reflect the current condition of the market, expected availability of funds, and local capacity to administer the plan. In addition to establishing goals related to the use of CDBG funds, the City of Flagstaff has established HUD-required strategies to improve the delivery system, address lead-based paint hazards, reduce the incidence of poverty, and address barriers to affordable housing development.

Every year the City submits an Annual Action Plan that lists the specific activities Flagstaff will pursue with CDBG funds to meet the identified ConPlan goals. This ConPlan includes the Annual Action Plan for Year 1 of the Consolidated Plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City of Flagstaff's Five-Year Consolidated Plan for 2021-2025 outlines specific steps for the community as it works to meet the housing and community development needs of low-and moderate income and special needs households. As part of the consolidated planning process the City conducted a comprehensive housing and community development Needs Assessment and Market Analysis. With these assessments and additional community data along with public and stakeholder input collected the

City identified four priority needs and established 11 activity goals for meeting these community needs in the next five years.

Identified High Priority Needs and Activity Goals Established

1. Support neighborhood revitalization and public facilities and infrastructure improvements especially in established target areas including:
 - a. Neighborhood revitalization including Neighborhood Facility and Infrastructure Improvements
 - i. Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.
 - ii. 3,000 people
 - b. Public Facilities
 - i. Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.
 - ii. 100 people
 - c. Acquisition for Affordable Housing Benefit
 - i. Includes acquisition of land/ real property for the development of affordable housing units
 - ii. 3 units
2. Support public services and economic opportunities for low-and moderate income persons including:
 - a. Services to Meet Basic Needs
 - i. Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.
 - ii. 300 people
 - b. Workforce Development
 - i. Includes Employment, Job Training and Small Business Support Services
 - ii. 15 people
 - c. Housing Stabilization Services
 - i. Includes Rental Assistance/ Eviction/ Foreclosure Prevention and Legal Services
 - ii. 50 households
3. Support services and projects addressing homelessness
 - a. Service and Facility Operating Support
 - i. Includes Outreach/ Shelter Managers/ Case Managers/ Coordinated Entry/ Etc.
 - ii. 1,500 people experiencing or at-risk of homelessness
 - b. Increase Shelter Beds/Units
 - i. Includes Emergency/ Transitional Shelter/ Permanent Supportive Housing
 - ii. 15 beds/units

4. Support the development, accessibility, and preservation of decent affordable housing including:
 - a. Rehabilitation of owner and/or renter households/units
 - i. 20 units
 - b. Development of owner and/or renter affordable housing units
 - i. 3 units
 - c. Housing Assistance for owner and/or renter households
 - i. Includes financial assistance for Deposits/ Down payment/ Closing Costs/ Etc.
 - ii. 50 households

3. Evaluation of past performance

The City of Flagstaff established 15 goals in the 5-year HUD Consolidated Plan beginning in PY2016:

- Revitalization, Public Facilities & Infrastructure, including:
 - 5 facility improvements benefitting 500 people
 - 2 ADA accessibility improvement projects benefitting 500 people
 - Land acquisition for one affordable housing development project benefitting 5 households
 - Infrastructure for one affordable housing development project benefitting 5 households
- Public Services & Economic Opportunities including
 - Service and facility operating support for 5 projects benefitting 2,000 people
 - One employment and job training support services project benefitting 5 people
 - Housing stabilization services benefitting 500 households.
- Addressing Homelessness including:
 - 5 outreach and service and facility operating support projects, increasing the number of emergency/transitional shelter beds by 20 beds
 - Increasing the supply of permanent supportive housing by 15 beds.
- Decent Affordable Housing including:
 - Rehabilitation of 25 owner-occupied housing units
 - Construction of 5 rental units
 - Construction of 2 owner units
 - Rehabilitation of 10 rental housing units.

In the context of limited CDBG and leverage funding, the City made significant progress towards investing in housing and public and supportive services for vulnerable populations. Throughout the last 2 Program Years of the previous Consolidated Plan, the COVID-19 global pandemic led to more households needing these services and the City and its partner agencies stepped in to provide a variety of services, many aimed to serve people at risk of or experiencing homelessness. Significant progress

was also made towards providing economic opportunities and a relatively large number of individuals benefitted from financial and housing counseling and several individuals benefitted from employment training.

Moderate progress was made towards enhancing Flagstaff neighborhoods – park and playground improvements and housing rehabilitation were the most notable enhancements; however, the continuing high cost of housing in Flagstaff presents challenges to acquiring and rehabilitating homes.

Moderate progress towards increasing the availability and affordability of housing for owners and renters was also made due to few opportunities to invest in additional housing. The City continued to make progress towards strengthening coordination and delivery of resources, operating the Flagstaff Public Housing Authority and City Housing Sections in one department, and maintaining a high level of involvement with the Coconino County Continuum of Care and Flagstaff Front Door for Coordinated Entry.

4. Summary of citizen participation process and consultation process

A draft of the Consolidated Plan was available on-line at the City's website for a 45-day comment period beginning March 1, 2021 and ending April 15, 2021. A virtual public hearing was held on April 13th, 2021 with City Council to discuss findings of the Consolidated Plan and Analysis of Impediments of Fair Housing Choice as well as recommended activity allocations for the Program Year 2021 entitlement. The public and stakeholders were encouraged to virtually attend and offer comments or to submit written comments directly to Council.

Additional consultation took place with the Coconino County Continuum of Care, a group of organizations providing services to homeless individuals and families and through a virtual outreach meetings held in September 2020. Additionally, the City conducted four (4) open to the public, virtual focus groups discussing each of the identified priority needs and proposed activity goals with residents and stakeholders. Due in part to the COVID-19 pandemic, the City utilized an on-line survey to reach residents and stakeholders for input on community needs and Con Plan goals. The survey was available online and 24 completed surveys were received. The City also held a public hearing with City Council in April 2021 during the public comment period. This hearing provided citizens an opportunity to comment on any aspect of the City's Consolidated Plan.

In 2019, City Council added a new chapter to the Flagstaff City Code, creating a Housing Commission. The Housing Commission consists of thirteen citizens, with twelve members appointed by the City Council and one representative from the Flagstaff Housing Authority Board of Commissioners. It serves as an advisory board to City Council; makes recommendations with respect to housing policies, needs, and programs in Flagstaff; and furnishes the Council with information through the Housing Director. The Commission holds monthly public meetings and provides an avenue for the community and

stakeholders to communicate with the Commission and City staff.

5. Summary of public comments

A summary of comments received at the 4 focus group, and housing commission meeting are attached. As is the community needs survey conducted and corresponding results. There were no public comments received at the _____.

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments were accepted.

7. Summary

The City of Flagstaff conducted public outreach and met with stakeholders to identify priority needs and establish 5-year goals and objectives in following priority areas - 1) neighborhood revitalization, public facilities and infrastructure, 2) public services and economic opportunities, 3) addressing homelessness, and 4) decent affordable housing.

Consolidated Plan Goals and Activities

Public and stakeholder input, records of past funding, the needs assessments and housing market analysis were all used to determine the relative priority of activities and the populations that will be served. HUD allows two priority designations – high and low. Assignment of priority does not reflect a lack of need for any particular population or activity; it merely identifies those conditions that are most likely to be addressed with limited CDBG funding.

- High priority activities are likely to be funded with CDBG resources during the next five years.
- Low priority activities may be funded as opportunities arise.
- Special Populations are certain clientele that are presumed by HUD to be low/moderate income and are defined as senior citizens, severely disabled adults, persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers.

The table below summarizes planned CDBG activities and the priority level and 5-year numeric goal for each. Activities that might be targeted to special populations are indicated. The table is designed to meet HUD requirements.

DRAFT

5-year Consolidated Plan Goals			
Activity	Special Population	Priority Level	5-year Goal
<u>Priority Need:</u> Neighborhood Revitalization, Public Facilities & Infrastructure			
Neighborhood Facility and Infrastructure Improvements - <i>Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.</i>		High	3,000 people
Public Facilities - <i>Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.</i>	X	High	100 people
Acquisition for Affordable Housing Development - <i>Land/ Real Property</i>		Low	3 units
<u>Priority Need:</u> Public Services & Economic Opportunities			
Services to Meet Basic Needs - <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Counseling/ Substance Abuse/ Etc.</i>	X	High	300 people
Workforce Development - <i>Includes Employment/ Job Training/ Business mentorship/ support/ assistance</i>	X	Low	15 people
Housing Stabilization - <i>Includes Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services/ Housing Counseling/ Etc.</i>		High	50 households
<u>Priority Need:</u> Addressing Homelessness			
Service and Facility Operating Support - <i>Includes Outreach/ Shelter Managers / Case Managers/ Coordinated Entry/ Etc.</i>	X	High	1,500 people
Increase Shelter Beds/Units - <i>Includes Emergency / Transitional Shelter/ Permanent Supportive Housing/ Etc.</i>	X	High	15 beds/units
<u>Priority Need:</u> Decent Affordable Housing – Owner & Renter			
Housing Rehabilitation - <i>Grants or Deferred Loan for Rehabilitation Costs</i>	X	High	20 units
Housing Development - <i>Includes Acquisition/ Demolition/ Preconstruction Costs/ Infrastructure</i>	X	High	3 units
Housing Assistance - <i>Includes Financial Assistance for Down-payment, Deposits/ Closing Costs</i>		High	50 households

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	FLAGSTAFF	City of Flagstaff Housing Section

Table 1 – Responsible Agencies

Narrative

The City's Housing Section is the HUD "lead agency" for the CDBG Consolidated Plan and Annual Action Plan. The Housing Section is part of the City's Community Development Division. In addition to Housing, the Community Development Division includes the Planning and Development services sections.

The Housing Section works to address the shortage of affordable housing with a number of programs and tools. In addition to administration of the CDBG program, the Housing Section performs four primary functions.

1. Research and Planning. Key to this focus area is the identification and maintenance of data pertinent to housing in Flagstaff and nationally, the creation and implementation of plans, the location and review of best practices and additional tools being used in other communities, and project specific planning.
2. Policy. The development and subsequent implementation of policy initiatives is critical to the success of the City of Flagstaff's overall housing and economic development goals. In general, policy development and implementation are designed to enhance City program effectiveness, identify gaps or underserved groups, and enhance the private sector's ability to provide market based solutions.
3. Housing Programs and Development. This focus area encompasses programmatic areas, as well as the implementation of previous planning efforts, resulting in the creation of housing opportunities.
4. The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 Housing Choice Vouchers, 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability.

Consolidated Plan Public Contact Information

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The City of Flagstaff DUNS Number is 08-830-2625

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

A draft of the Consolidated Plan was made available on-line at the City's website starting March 1, 2021. A public hearing was held on April 13th, 2021 with City Council. The public and stakeholders were encouraged to attend and offer comments or to submit written comments.

Additional consultation took place with the Coconino County Continuum of Care, a group of organizations providing services to homeless individuals and families and through two outreach meetings held in December 2020 and February 2021. In addition to public hearings and consultation, the City utilized a survey to reach residents and stakeholders. The survey was available online and 24 completed surveys were received. Additionally, the City conducted four open to the public, virtual focus groups discussing each of the identified priority needs and proposed activity goals with residents and stakeholders.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City has developed an extensive mailing and email list that includes over 150 people that represent organizations that serve homeless and at-risk households, mainstream service and housing agencies, community development organizations, civic leaders, etc. This list is used to regularly inform these agencies of planning efforts, funding opportunities, changes in policy and practice or any other information that agencies may find useful.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City participates with the Coconino County Continuum of Care (managed by the Arizona Department of Housing), including working groups, sub-committees and advisory groups around specific homeless and at risk-populations. These meetings bring together shelter providers, prevention providers, housing providers and agencies that deliver prevention, rapid re-housing, emergency and transitional shelter services and permanent supportive housing opportunities. City of Flagstaff staff participate on the Executive Committee.

The City has participated on the Point-In-Time (PIT) steering committee for the seven years and worked with Northern Arizona University to assist in developing the survey instrument for the Balance of State Continuum of Care. In addition, City Staff leads the Flagstaff Project Homeless Connect steering committee and the System Design Steering committee.

City staff has been instrumental in the creation of Front Door Coordinated Entry. The System Design Steering committee has created a single point of entry for coordinated assessment in the Flagstaff area, known as Front Door. Since January 2017, accessing housing and services has been dramatically simplified for those in crisis. When members of the community identify themselves to be in a housing crisis, they can access community services by entering the Front Door Program.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Flagstaff is not an ESG grantee.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	CATHOLIC CHARITIES OF NORTHERN ARIZONA
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Catholic Charities of Northern Arizona continued to monitor the needs of Northern Arizona communities and responded by providing life-changing services that protect and nurture children, help strengthen families and assist individuals in crisis. Catholic Charities delivers services in foster care, adoption and pregnancy counseling, North Star youth development and Westside Head Start early education. Over the years in response to community needs, Catholic Charities has grown to serve veterans and their families, sex-trafficked survivors, victims of domestic abuse, refugees and those experiencing homelessness. Catholic Charities of Northern

	Arizona is also a key partner of the Front Door of Coconino County.
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2	Agency/Group/Organization	Coconino County Health and Human Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Health Agency Other government - County Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Coconino County Community Services Department (CCCSD) is the largest provider of emergency services in the community, specifically eviction/foreclosure prevention and move in assistance; it is the number one referral agency in both the County and the City of Flagstaff. Coconino County Health and Human Services is the recognized Community Action Agency for the County and covers a service area of 18,000 square miles. CCHHS has successfully administered an eviction and foreclosure prevention program for the last thirtysix (36) years. The agency was consulted through public meetings,

	the public comment period and one on one technical assistance.
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3	Agency/Group/Organization	CITY OF FLAGSTAFF
	Agency/Group/Organization Type	Housing PHA Services - Housing Service-Fair Housing Other government - Local Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City will continue to utilize CDBG funds in target neighborhoods. These programs serve low to moderate income residents of target neighborhoods. The programs improve infrastructure and revitalize low income neighborhoods
4	Agency/Group/Organization	SOUTHWEST BEHAVIORAL HEALTH SERVICES, INC.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Southwest Behavioral & Health Services offers an array of programs to meet the unique needs of the communities we serve. These include outpatient mental health treatment and psychiatric services including medication monitoring; assistance for persons with addictions; intensive inpatient care for persons in crisis; residential housing, in-home and supported housing services; prevention services, community outreach and school-based counseling; services throughout the lifespan for members with Autism Spectrum Disorder (ASD); and four opioid replacement clinics throughout the state that are working tirelessly to save lives and help alleviate the statewide crisis. SB&H also offers permanent supportive housing funding for seriously mentally ill clients. The agency was consulted through public meetings, the public comment period and one on one technical assistance.</p>
5	Agency/Group/Organization	Flagstaff Shelter Services
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Flagstaff Shelter Services offers homeless individuals shelter and supportive services and is focused on chronically homeless individuals, many of whom have serious psychiatric or substance abuse issues. Flagstaff Shelter Services provides all individuals experiencing homelessness with coordinated entry know as Flagstaff's Front Door. The agency was consulted through public meetings, the public comment period and one on one technical assistance.</p>
6	Agency/Group/Organization	The Guidance Center
	Agency/Group/Organization Type	Housing Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Guidance Center (TGC) is a not-for-profit Community Mental Health Center with locations serving Flagstaff. TGC provides a full range of services, which include everything from general mental health counseling for everyday stressors, to our inpatient psychiatric hospital for acute psychiatric emergencies. TGC is committed to creating healthy individuals, families and communities. The agency was consulted through public meetings, the public comment period and one on one technical assistance.
7	Agency/Group/Organization	Housing Solutions of Northern Arizona
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Solutions of Northern Arizona (HSNA) is a nonprofit housing organization, founded as the Affordable Housing Coalition in 1990 through the grassroots efforts of local citizens concerned about the lack of affordable housing in the Flagstaff community. HSNA expanded from an advocacy organization to one that focuses on programs designed to help residents identify and maintain safe, decent, and affordable housing. The agency's mission is "building opportunities for sustainable, affordable housing in northern Arizona." The agency was consulted through public meetings, the public comment period and one on one technical assistance.
8	Agency/Group/Organization	Building Community Flagstaff
	Agency/Group/Organization Type	Consultant for Nonprofits
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Building Community Flagstaff's mission is to develop reciprocal relationships and communication systems among staff, organizations, and populations served to optimize organizational development, service alignment, and community development. The organization's vision is to develop efficient, effective, and comprehensive social service networks. The agency was consulted through public meetings and the public comment period.
9	Agency/Group/Organization	SALVATION ARMY
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Salvation Army is an evangelical organization working to meet basic human needs in the community. The agency was consulted through public meetings and the public comment period.
10	Agency/Group/Organization	Threaded Together
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-Education Services-Employment Services - Victims

	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Threaded Together is a nonprofit organization devoted to inspiring creativity and connection through textile arts programs that empower participants, enrich community, and offer employment pathways for women and vulnerable populations. The agency was consulted through public meetings, the public comment period and one on one technical assistance.

11	Agency/Group/Organization	Health Choice Integrated Care
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Health Choice Integrated Care is the Northern Arizona Accountable Care Organization and provides an integrated approach to health and wellness for patients. The agency was consulted through public meetings, the public comment period and one on one technical assistance.

12	Agency/Group/Organization	Desert Seeds / Semillas del Desierto
	Agency/Group/Organization Type	Services -Gardening
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended public meetings.
13	Agency/Group/Organization	Habitat for Humanity of Flagstaff
	Agency/Group/Organization Type	Housing Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity believes that every man, woman, and child should have a decent, safe, and affordable place to live. The organization builds and repairs houses all over the world using volunteers and donations. Partner families purchase these houses through no-profit, no-interest mortgage loans and other innovative financing methods. The agency was consulted through public meetings, the public comment period and one on one technical assistance.
14	Agency/Group/Organization	Flagstaff Family Food Center
	Agency/Group/Organization Type	Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Serving hope to Flagstaff families by providing hunger relief and children's literacy programs. The agency was consulted through public meetings, the public comment period and one on one technical assistance.
15	Agency/Group/Organization	CHICANOS POR LA CAUSA
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education

What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Chicanos Por La Causa (CPLC) programs work to help individuals and families achieve self-sufficiency by providing accessible healthcare; affordable housing; a quality education; access to meaningful work; and political representation. The agency was consulted the public comment period and one on one technical assistance.

Identify any Agency Types not consulted and provide rationale for not consulting

All major agencies providing a full range of public services in and around the Town of Gilbert were contacted to request comments. No specific agency or agency type was excluded. service, housing, and health agencies; other government agencies; planning organizations; and business and civic leaders. All agencies are offered the opportunity to have input into the Consolidated Plan and Action Plan through stakeholder meetings, public meetings, e-mail, and written input. No specific agency types were identified as not consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Coconino County Continuum of Care	Arizona Department of Housing	The City's Consolidated Plan identifies addressing homelessness as a priority need.
Coconino County Action Alliance	Coconino County Health and Human Services	The City's Consolidated Plan priority needs all overlap with the goals of the County Action Alliance
Housing Attainability Study	Housing Solutions of Northern Arizona	The City's Consolidated Plan and this study provide a thorough assessment of housing needs in Flagstaff
Community Needs Assessment 2020	Coconino County Health and Human Services	The City's Consolidated Plan and this assessment both work to identify community needs

Table 2 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City Housing Section works with Coconino County and various City and County departments to coordinate resource delivery to eligible households. The City works with the State's homeless and special needs staff and the local Continuum of Care to support as many targeted activities as CDBG funding will allow. The City supports developers, when appropriate, that are seeking funding for LIHTC and other projects that will serve Flagstaff's low and moderate income households.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The citizen participation process began with a citywide, virtual public hearing held December 28th, 2020 to solicit citizen input prior to preparing a draft 5-year Consolidated Plan and PY 21 Action Plan. A notice announcing the hearing and soliciting comments was published in the Daily Sun and an email notice was sent to the Housing Section's e-mail distribution list as well as the Continuum of Care member email listserv. A notice of the hearing was posted on the City's web site and Facebook pages (Main and Housing specific). A second meeting to solicit input was held on February 26th, 2021 and similarly noticed.

The draft Consolidated Plan and PY16 Annual Action Plan were issued for a 45-day public comment period beginning March 1, 2021 and ending April 15th, 2021. Comments could be submitted by mail or by e-mail or citizens could comment at the April 13th, 2021 public hearing with City Council. Draft documents were available on the City website.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Community Survey	Non-targeted/broad community	24 completed surveys were received.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	
2	Public Meeting	Non-targeted/broad community	12 individuals attended the public meeting.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Hearing	Non-targeted/broad community	10 individual attended the public hearing.	One individual congratulated the City on its willingness to work cooperatively with other agencies to address the needs of low- and moderate income households.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Focus Group	Non-targeted/broad community	2 individuals attended the public meeting.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	
6	Focus Group	Non-targeted/broad community	5 individuals attended the public meeting.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	
6	Public Meeting	Non-targeted/broad community	4 individuals attended the public meeting.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	5
7	Focus Group	Non-targeted/broad community	6 individuals attended the public meeting.	A summary of comments is included in the rationale for each identified Consolidated Plan priority need.	All comments were accepted.	5

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Internet Outreach	Nontargeted /broad community	Emails were sent to over 300 member of Coconino County's Continuum of Care informing agencies of important dates for the 2020 Community Development Block Grant Schedule, public comment period and deadlines.	No Comments Received	N/A	
9	Newspaper Ad	Persons with disabilities Nontargeted /broad community	Arizona Daily Sun ad February 19 & 20, 2021 - Invited the public to second Public Meeting to discuss the use of CDBG funding on February 26, 2021.	No Comments Received		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Newspaper Ad	Persons with disabilities Nontargeted /broad community	Arizona Daily Sun ad December 26 & 27, 2021 - Invited the public to first Public Meeting re NoFA for CDBG funding on December 28, 2020.	No Comments Received		

Table 3 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Flagstaff is a mountain city located at 7,000 feet in the highlands of north central Arizona. It is surrounded by the Coconino National Forest, which contains the largest contiguous stand of Ponderosa Pines in the world. Flagstaff occupies 65 square miles on a volcanic plateau at the base of Arizona's highest point, the San Francisco Peaks, at 12,633 feet. Flagstaff is considered a metropolitan area because its population is over 50,000; however, its identity is still rooted in its small town mountain heritage. Hunting, fishing, skiing, mountain biking and rock climbing are just a few of the outdoor activities that attract people to Flagstaff.

Flagstaff has long been a transportation hub. Located along an old wagon road to California, Flagstaff's development began after the railroad arrived in 1881. Today, Flagstaff is the economic hub of Northern Arizona, ideally situated at the junction of Interstates 40 and 17. The Phoenix metropolitan area is 140 miles to the south and Grand Canyon National Park is approximately 80 miles to the north.

Flagstaff's incorporated population is about 70,000, with an additional 20,000 living in nearby unincorporated communities, and a trade area of 240,700. There are roughly 49,000 people employed in Flagstaff.

Flagstaff is home to Northern Arizona University (NAU). The school specializes in a number of environmental areas including forest health and biology. NAU is the state's largest residential campus, with roughly 22,000 students enrolled. Flagstaff has nine public elementary schools, two middle schools, two high schools and many private and charter schools. The newly expanded Coconino Community College is located adjacent to the NAU campus.

Flagstaff is a governmental, educational, transportation, cultural and commercial center, with healthcare, education, and tourism as major sources of employment. The city is home to a number of scientific and high-tech research and development industries, including W.L. Gore, Machine Solutions, and Prent Thermoforming. The community also has two museums, numerous art galleries, a symphony orchestra, four recreation centers, an ice-skating rink and a major ski resort. Flagstaff has extensive medical facilities and resources, including a state-of-the-art trauma center at the Flagstaff Medical Center.

Coconino County and Flagstaff possess an abundance of natural, cultural and archaeological resources, fueling an active tourism economy. Primary among all attractions is the Grand Canyon, a widely recognized natural wonder that stimulates domestic and international visitation at a rate approaching four million persons per year.

The Flagstaff area has a relatively finite amount of developable private land. Of the large vacant parcels located within the City limits, a majority are at the periphery and can be considered potential "greenfield development" or developments that incorporate sustainable programs and technologies

such as lifecycle housing, complete streets, parks and open spaces, integrated retail and office, energy efficient buildings, innovative rainwater and stormwater facilities, and sidewalks and trails. Densities are expected to increase slowly over the next forty years, with more housing, employment, and transportation options.

According to the Flagstaff Regional Plan 2030, projections for the ultimate population of Flagstaff and surrounding areas vary. Population projections adopted by the Arizona Department of Economic Security in 1997 showed an anticipated population of 158,272 in the year 2050, while 2006 projections were 96,418 and more recent estimates are lower still. If large population growth occurs and accommodations have not been made, local housing and land costs will increase substantially, and newcomers may be forced to move to distant communities, creating sprawl and long commutes to work.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

In December 2020, Flagstaff City Council declared a Housing Emergency via Resolution 2020-66 (Attachment C). The Resolution recognizes the need to make housing a leading priority for the City of Flagstaff as an organization and the community overall. It also calls for a number of efforts to be undertaken, among them, the development of a 10-year housing plan (underway), the creation and implementation of a public outreach campaign to educate the community about the critical role affordable housing plays in a thriving community and combating “Not in My Backyard” opposition to housing and affordable housing.

The City’s growing population will require an increased emphasis on housing choices in the future. The region’s housing is influenced by:

- Limited supply of land for development;
- Approximately forty percent (40%) of Flagstaff’s households are by definition low- to moderate-income (City FY 2016 - 2020 HUD Consolidated Plan);
- Consistent but modest rate of population growth;
- NAU’s total enrollment has grown by 16.2 percent in the last five years (Fall 2013 – Fall 2018); and
- Housing needs for the elderly, multigenerational families and downsizing will increase over the next several decades as the Baby Boom generation moves into the retirement years.

Local growing population sectors include the elderly, students, single-parent households, and nonfamily households. These community members need a variety of housing options within proximity to jobs, schools, and services. NAU students currently make up approximately thirty percent (30 %) percent of the local population, and their continued demand for student housing impacts cost and availability of housing in the region, resulting in a higher demand for multi-family housing, or housing affordable for single-incomes or multiple low incomes.

An annual survey conducted by a local non-profit, Housing Solutions of Northern Arizona (HSNA), continues to show rising rates and less availability of rental units within City limits. As of May 2019, the data shows 801 people on waiting lists at income-restricted complexes. Market rate rental averages were measured as follows:

\$808 for a room/shared living	up 9.5%
\$979 for a studio	up 7.7%
\$1,214 for a one-bedroom.....	up 4%
\$1,494 for two-bedroom	up 3.7%
\$1,819 for a three-bedroom	down 2.5%

These actual rents have been well above the HUD Fair Market Rents (FMRs) for several years. The HSNA survey states, “In order to afford an average two-bedroom apartment - without paying more than 30% of income on housing - a household must earn approximately \$4,980 monthly, \$59,760 annually, or \$28.73 hourly (assuming a 40-hr work week and 52 weeks/yr.)” The City is experiencing an immediate need to house hundreds of households at more affordable rates.

The City's general plan focuses on the creation of diverse and affordable housing, particularly in activity centers spread throughout the community:

"As a community priority, creating more housing and neighborhood diversity is paramount to a resilient Flagstaff. The Flagstaff Regional Plan identifies existing and potential "activity centers" through which to cultivate walkable neighborhoods, efficient transit connections, and economic opportunities. These are considered appropriate locations for sensitively designed, higher-density residential and mixed-use development, either as infill or as redevelopment."

Many City properties and scattered site public housing units are located within pedestrian sheds of such activity centers. Proximity to services, employment, and retail contribute to a complete neighborhood and vibrant multi-family developments. The Regional Plan may be accessed at www.flagstaffmatters.com.

Demographics	Base Year: 2011	Most Recent Year: 2019	% Change
Population	68,375	72,402	5.9%
Households	23,292	23,839	2.4%
Median Income	\$48,680.00	\$58,748.00	20.68%

Table 4 - Housing Needs Assessment Demographics

Data Source Comments:
2011-2015 ACS (Base Year), 2015-2019 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	3815	2780	3835	2175	11050
Small Family Households	765	905	1120	765	5365
Large Family Households	130	95	230	195	760
Household contains at least one person 62-74 years of age	280	300	765	390	2240
Household contains at least one person age 75 or older	240	140	230	219	520
Households with one or more children 6 years old or younger	430	240	390	435	1355

Table 5 - Total Households Table

Data Source Comments:
2013-2017 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	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	55	90	10	40	240	10	-	-	-	40
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	160	155	120	570	-	4	-	-	15
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	130	10	75	10	280	55	-	-	-	90
Housing cost burden greater than 50% of income (and none of the above problems)	2,070	1,415	440	10	3,930	445	270	250	15	1,015

	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
Housing cost burden greater than 30% of income (and none of the above problems)	205	375	1,245	500	2,555	75	85	375	270	1,280
Zero/negative Income (and none of the above problems)	220	-	-	-	220	125	-	-	-	125

Table 6 – Housing Problems Table

Data Source

Comments: 2011-2015 CHAS; DATA FOR 80%-100%AMI AND >100%AMI ARE NOT DISPLAYED BUT ARE INCLUDED IN THE TOTALS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	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	2,260	1,670	680	180	510	275	250	15	1,155	510
Having none of four housing problems	540	565	1,890	1,125	155	270	1,015	860	9,455	155
Household has negative income, but none of the other housing problems	220	-	-	-	125	-	-	-	125	125

Table 7 – Housing Problems 2

Data Source

Comments: 2011-2015 CHAS; DATA FOR 80%-100%AMI AND >100%AMI ARE NOT DISPLAYED BUT ARE INCLUDED IN THE TOTALS

3. Cost Burden > 30%

	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	405	635	490	1,825	155	105	145	770
Large Related	60	40	45	155	10	30	8	103
Elderly	185	159	125	569	205	90	225	709
Other	1,810	1,115	1,065	4,370	160	140	240	730
Total need by income	3,025	2,235	N/A	12,925	790	545	1,265	10,740

Table 8 – Cost Burden > 30%

Data Source

Comments: 2011-2015 CHAS; DATA FOR 80%-100%AMI AND >100%AMI ARE NOT DISPLAYED BUT ARE INCLUDED IN THE TOTALS

4. Cost Burden > 50%

	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	320	455	125	900	145	80	60	295
Large Related	60	20	-	80	10	15	4	29
Elderly	105	90	30	235	145	40	80	299
Other	1,765	990	290	3,045	160	140	100	410
Total need by income	3,025	2,235	N/A	12,925	790	545	1,265	10,740

Table 9 – Cost Burden > 50%

2011-2015 CHAS; DATA FOR 80%-100%AMI AND >100%AMI ARE NOT DISPLAYED BUT ARE INCLUDED IN THE TOTALS

5. Crowding (More than one person per room)

	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	115	145	130	40	595	55	-	-	-	70
Multiple, unrelated family households	-	-	15	14	44	-	4	-	-	34
Other, non-family households	45	45	90	75	255	-	-	-	-	-
Total need by income	3,025	2,235	N/A	1,300	12,925	790	545	1,265	875	10,740

Table 10 – Crowding Information – 1/2

2011-2015 CHAS;
DATA FOR 80%-
100%AMI AND
>100%AMI ARE NOT
DISPLAYED BUT ARE
INCLUDED IN THE
TOTALS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	280	155	310	1445	150	85	80	1405

Table 11 – Crowding Information – 2/2

2011-2015 CHAS;
DATA FOR 80%-
100%AMI AND
>100%AMI ARE NOT
DISPLAYED BUT ARE
INCLUDED IN THE
TOTALS

Describe the number and type of single person households in need of housing assistance.

HUD CHAS data breaks households into 4 categories including small related (2-4 persons), large related (5 or more), elderly and other. CHAS data places single person household into the "other" category. Single person households, categorized as "other" by CHAS data, are the most highly likely to be housing cost burdened renters.

There are an estimated 6,150 single-person households in Flagstaff. The largest number of single-person households are non-elderly (age 64 and under) renters – 3,124 households. Of the 12,925 renter

households in Flagstaff, 6,919 households, more than half, at or below 80% AMI are housing cost burdened greater than 30% while 3,045 single person renter households below 80% AMI are housing cost burdened with housing costs exceeding 50% of monthly income. Many but not all of these households are students attending NAU. There are also an estimated 1,033 non-elderly single-person owner households in need of housing assistance. Among elderly single-person households there are an estimated 235 renters and 299 owners in need of housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Based on Coconino County CHAS disability and housing problems data and Flagstaff American Community Survey disability data there are an estimated 490 households with a person with a disability in need of housing assistance. According to ACS 2019 estimates, ambulatory and cognitive disabilities are the most prevalent disabilities among non-elderly adults and cognitive and independent living disabilities are the most prevalent among elderly adults.

Based on the most recent point-in-time count by the Arizona Department of Housing there were 103 sheltered individuals in housing facilities serving victims of domestic violence; 8, or 40% of unsheltered individuals reported that domestic violence contributed to homelessness. Northland Family Help Center provided shelter to 520 adult victims of domestic violence between January 2016 and November 2020. Sharon Manor provided shelter to approximately 48 victims of domestic violence last year and 64 are on the waiting list for transitional housing.

In 2019, the Flagstaff Police Department reported 1,809 cases of domestic violence calls. As of October 2020, the department had already recorded 1,589 cases. The Flagstaff Police Department defines domestic violence as violence occurring between people who live together and isn't necessarily limited to people romantically involved. The increase was suspected to be due to a combination of factors, with the underlying [COVID-19] restrictions and an increase in student housing with common areas for roommates.

There was a 21.4% increase in domestic violence in Flagstaff in 2019. There is no data regarding the number of people in need of housing assistance who are victims of dating violence, human trafficking, sexual assault and stalking; the Flagstaff Police Department reported 121 sex offenses in 2019.

What are the most common housing problems?

The most common housing problems are severe housing cost burden (paying 50% or of income for housing) and housing cost burden (paying more than 30% but less than 50% of income for housing).

Are any populations/household types more affected than others by these problems?

Extremely low-income renters (income < 30% AMI) are the largest income cohort experiencing housing cost burden and severe housing cost burden; low-to-moderate income owners (income 50-80% AMI) also experience high rates of cost burden and severe cost burden.

While HUD data suggests that non-family households are disproportionately affected by housing cost burden and severe housing cost burden, many of these households consist of students attending NAU. Considering family households, both large and small family renters are most affected by housing cost burden and severe housing cost burden.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

By the very nature of their financial situation, extremely low income households with a severe housing cost burden are at a high risk of becoming homeless. According to HUD data, there are 2920 nonelderly large and small family renter households in this situation. For low-income single-parent households, the cost burden is compounded by the added responsibilities assumed by the parent and the added demands on his/her time. According to 2015-2019 ACS data, there are a total of 2,772 single-parent households in Flagstaff and in 1,696 or 61% of these households the householder is female. Female-headed households with children can often suffer an additional cost burden due to income disparities. The greatest needs of at-risk families are securing adequate employment, accessing social services and other resources, and developing the knowledge and skills needed to achieve greater financial stability and remain permanently housed.

In addition to employment opportunities and needs similar to those described above for low-income families with children, formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance are most in need of permanent affordable rental housing, including Public Housing and Section 8 Housing Choice Vouchers, and permanent supportive housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Apart from the 2,995 extremely low-income renter households and 445 extremely low-income homeowner households experiencing cost burden, the City of Flagstaff does not provide estimates of the at-risk population.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics linked with instability and increased risk of homelessness include severe housing cost burden and overcrowding. As part of the Statewide point-in-time count, homeless persons in Coconino County were surveyed about factors that contributed to their loss of housing. The primary responses were 1) no employment, 2) the high cost of housing, and 3) insufficient income. Respondents to the City's Consolidated Plan survey identified the high cost of rental housing as the primary housing characteristic linked with instability.

Discussion

The most common housing problems are severe housing cost burden (paying 50% or of income for housing) and housing cost burden (paying more than 30% but less than 50% of income for housing).

Extremely low-income renters (income < 30% AMI) are the largest income cohort experiencing housing cost burden and severe housing cost burden; low-to-moderate income owners (income 50-80% AMI) also experience high rates of cost burden and severe cost burden.

While HUD data suggests that non-family households are disproportionately affected by housing cost burden and severe housing cost burden, many of these households consist of students attending NAU. Considering family households, both large and small family renters are most affected by housing cost burden and severe housing cost burden.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The race and ethnicity of the City's population became more diverse from 2000 to 2011, yet the majority of the population is White (78%). In 2018, there were 4.66 times **more** White (Non-Hispanic) residents (45.7k people) in **Flagstaff, AZ** than any other race or ethnicity. There were 9.8k White (Hispanic) and 5.51k American Indian & Alaska Native (Non-Hispanic) residents, the second and third most common ethnic groups. Among all races, 19% identify as Hispanic or Latino. Students attending Northern Arizona University contribute to racial diversity in Flagstaff, particularly among African American and Pacific Islander populations. The City's 2021 Analysis of Impediments to Fair Housing Choice describes in greater detail the socio-economic conditions of Flagstaff's minority residents.

0%-30% of Area Median Income

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
Jurisdiction as a whole	3,225	330	325
White	1,805	185	185
Black / African American	60	4	35
Asian	110	0	15
American Indian, Alaska Native	340	50	40
Pacific Islander	0	0	0
Hispanic	750	35	45

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

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
Jurisdiction as a whole	2,185	370	0
White	1,300	195	0
Black / African American	90	4	0
Asian	70	4	0
American Indian, Alaska Native	305	65	0
Pacific Islander	0	0	0
Hispanic	405	90	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

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
Jurisdiction as a whole	2,385	1,330	0
White	1,715	740	0
Black / African American	4	50	0
Asian	60	30	0
American Indian, Alaska Native	270	255	0
Pacific Islander	15	0	0
Hispanic	265	235	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

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
Jurisdiction as a whole	925	1,315	0
White	715	845	0
Black / African American	4	50	0
Asian	10	44	0
American Indian, Alaska Native	55	105	0
Pacific Islander	0	0	0
Hispanic	150	260	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Disproportionately greater housing needs occur at each HUD income category; however, disproportionate housing need is not consistent for any one racial or ethnic group. The relatively small number of households in some racial and ethnic categories combined with the large proportion of NAU students who are minorities may impact this assessment. For example, there are 15 Pacific Islander households with income between 50% and 80% AMI - all households have housing needs and local data suggests that all households are student households.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

When a population's proportion of severe housing need is at least 10% higher than the housing needs of the population as a whole, the City considers that population to have disproportionate need.

0%-30% of Area Median Income

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
Jurisdiction as a whole	3,070	480	325
White	1,715	275	185
Black / African American	60	4	35
Asian	110	0	15
American Indian, Alaska Native	290	95	40
Pacific Islander	0	0	0
Hispanic	730	60	45

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

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
Jurisdiction as a whole	1,535	1,020	0
White	990	505	0
Black / African American	90	4	0
Asian	65	8	0

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
American Indian, Alaska Native	110	255	0
Pacific Islander	0	0	0
Hispanic	270	225	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

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
Jurisdiction as a whole	735	2,975	0
White	450	2,015	0
Black / African American	4	50	0
Asian	35	55	0
American Indian, Alaska Native	125	400	0
Pacific Islander	0	15	0
Hispanic	90	410	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

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
Jurisdiction as a whole	185	2,050	0
White	140	1,410	0
Black / African American	0	55	0
Asian	0	54	0
American Indian, Alaska Native	35	120	0
Pacific Islander	0	0	0
Hispanic	10	400	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Among households with incomes below 30% AMI, Black/African American households have disproportionately greater severe housing needs. 2% of the City's population is Black/African American and 43% of Black/African American people in Flagstaff are NAU students.

Disproportionately greater severe housing needs occur at each HUD income category except 30% to 50% AMI. Disproportionately severe housing need is consistent among Hispanic households with incomes between 50% and 100% AMI. Disproportionately severe housing needs among Hispanic households may result from larger family sizes and multi-generational households that result in overcrowding and severe overcrowding as defined by HUD.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

When a population's proportion of housing cost burden is at least 10% higher than the housing cost burden of the White population as a whole, the City considers that population to have disproportionate need. Due to inaccuracies in the data provided by HUD, housing cost burden among racial and ethnic groups are measured against housing cost burden of White households as White households are the most prevalent type in Flagstaff.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,790	4,160	5,025	325
White	9,795	3,080	3,095	185
Black / African American	225	30	154	35
Asian	205	40	210	15
American Indian, Alaska Native	1,035	440	390	40
Pacific Islander	20	15	0	0
Hispanic	2,315	505	975	50

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

Housing cost burden is disproportionately high among the following racial and ethnic groups in relation to White households:

- Households with income < 30% - American Indian, Hispanic
- Households with income 30% to 50% AMI – Pacific Islander; and
- Households with income 50% to 80% AMI – none.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Housing Needs

- Among households with incomes below 30% AMI, Black/African American and American Indian/Alaskan Native households have disproportionately greater housing needs.
- Among households with incomes between 30% and 50% AMI, Asian households have disproportionately greater housing needs.
- Among households with incomes between 50% and 80% AMI, Pacific Islander households have disproportionately greater housing needs.
- Among households with incomes between 80% and 100% AMI, Native American households have disproportionately greater housing needs.

Severe Housing Needs

- Among households with incomes below 30% AMI, Black/African American households have disproportionately greater severe housing needs.
- Among households with incomes between 30% and 50% AMI, no households have disproportionately greater severe housing needs.
- Among households with incomes between 50% and 80% AMI, Hispanic households have disproportionately greater severe housing needs.
- Among households with incomes between 80% and 100% AMI, Native American and Hispanic households have disproportionately greater severe housing needs.

Housing cost burden:

Housing cost burden is disproportionately high among the following racial and ethnic groups in relationship to White households:

- Households with income < 30% - Black/African American;
- Households with income 30% to 50% AMI – Pacific Islander.

If they have needs not identified above, what are those needs?

The needs of racial and ethnic minorities are similar to the needs of all Flagstaff residents – access to employment that matches education and skill level is a primary need that if met will assist lower-income residents to attain meaningful employment of sufficient wage to support a higher quality of life.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Of the 18 Block Groups where the non-White population is 10% higher than citywide, 10 include Northern Arizona University and adjacent Block Groups (NAU Block Groups). NAU students account for the entire Pacific Islander population, 43% of the Black/African American population, 20% of the Asian population, and 20% of the Hispanic population. More than 1/3 (37%) of the Black/African American population lives in NAU Block Groups, as does 56% of the Asian population and 50% of the Hispanic population.

Outside of the NAU Block Groups, the Hispanic population is disproportionately high in seven Block Groups: Census Tract 3 Block Group 1; Census Tract 4 Block Group 5; Census Tract 5 Block Groups 1 through 4; and Census Tract 11.02 Block Groups 1 and 3. Also outside the NAU Block Groups, the American Indian population is disproportionately high in eight Block Groups: Census Tract 4 Block Groups 2, 3, and 5; Census Tract 5 Block Groups 1 through 3; Census Tract 7 Block Group 1; Census Tract 9 Block Group 3; and Census Tract 11.02 Block Group 1. These Block Groups also include the four target areas identified by the City.

NA-35 Public Housing – 91.205(b)

Introduction

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 housing choice vouchers, 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability. The average annual income of public housing residents is \$22,215 and the average annual income of voucher holders is \$14,778. The average stay of public housing residents is 9 years and 2 months and the average annual time receiving housing assistance from a Housing Choice Voucher is 7 years 4 months. The public housing program is accepting applications and the approximate wait time is 6 months to 4 years for public housing. The waiting list for the Housing Choice Voucher Program is currently closed (except for special programs) and the approximate wait time is 1 and ½ to 3 years or more for a Housing Choice Voucher.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	12	265	455	0	361	94	0	0

Table 21 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: Flagstaff Housing Authority

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	49,66	\$22,215	\$14,351	0	\$15,061	13,641	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average length of stay	0	8.5	9.2	7.4	0	4	0	0
Average Household size	0	1	3	2	0	2	1	0
# Homeless at admission	0	1	3	18	0	3	15	0
# of Elderly Program Participants (>62)	0	1	1	53	0	52	1	0
# of Disabled Families	0	10	37	190	0	190	56	0
# of Families requesting accessibility features	0	10	1	353	0	329	24	0
# of HIV/AIDS program participants	0	0	9	0	0	0	0	0
# of DV victims	0	0	10	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: Flagstaff Housing Authority

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	8	104	315	0	362	71		

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Black/African American	0	0	12	29	0	24	5		
Asian	0	0	0	2	0	2	0		
American Indian/Alaska Native	0	2	139	111	0	93	18		
Pacific Islander	0	0	2	0	0	0	0		
Other	0	0	0	0	0	0	0		
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Race of Public Housing Residents by Program Type

Data Source: Flagstaff Housing Authority

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	80	75	0	75	5	0	0
Not Hispanic	0	10	185	339	0	257	89	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: Flagstaff Housing Authority

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Very few tenants and applicants (less than 5%) request accessible units or accessibility improvements. When requests are received the vast majority are for companion/emotional support -animals with the remainder being for grab bars, no stairs, flat entries, and service/assistive/ animals.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs of public housing residents include less need for verification and simplification of the rules. The most immediate need among Housing Choice Voucher holders is available units to lease that are within the payment standard.

How do these needs compare to the housing needs of the population at large?

The housing needs of public housing residents and Housing Choice Voucher holders are comparable to the needs of the low-income population at large – units of sufficient size to adequately house their families and housing units that are affordable.

Discussion

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 housing choice vouchers, 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability. The average annual income of public housing residents is \$22,215 and the average annual income of voucher holders is \$14,778. The average stay of public housing residents is 9 years and 2 months and the average annual time receiving housing assistance from a Housing Choice Voucher is 7 years 4 months.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Arizona Rural Continuum of Care is managed by the Arizona Department of Housing (ADOH) and works throughout rural Arizona, including the City of Flagstaff, to coordinate homeless planning across municipalities and agencies. The City may use CDBG resources to support or expand facilities and services for homeless people and works closely with the Coconino County Continuum of Care and the coordinated entry program “Front Door of Flagstaff”.

Homeless individuals and families in Flagstaff reflect the diversity, complex characteristics and special needs of homeless people throughout the United States. Some homeless people require limited assistance to regain permanent housing and self-sufficiency. Others, especially people with disabilities and those who are chronically homeless, require extensive and long-term support. In addition to people who are already homeless, individuals and families with limited incomes may be in imminent danger of becoming homeless.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

According to the Arizona Department of Housing point-in-time unsheltered count for Coconino County homeless individuals and families have been without a home as follows: 8% for less than 30 days; 19% for 31 days to 6 months; 9% for 7 to 12 months; 8% for 13-24 months and 46% for more than 24 months. There is no breakdown by homeless population type and there is no data available for the number of persons exiting homelessness each year.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	170	87
Black or African American	21	18
Asian	13	0
American Indian or Alaska Native	108	6
Pacific Islander	0	1
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	135	11
Not Hispanic	272	115

Data Source

Comments: 2020 Point-in-Time Count AZ-500 Arizona Balance of State CoC

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

In January 2020, there were 407 individuals in 136 sheltered families, and 10 in permanent supportive housing. Among families with children, most are single-parent female-headed households. There were an estimated 3 families with children that included a Veteran. The 2020 Balance of State point-in-time count identified 13 adults with children and 17 children under the age of 18 experiencing homelessness. There were 2 households that included a Veteran; these households may also include children. It is important to note that the 2020 point-in-time count took place in January and that the number of individuals experiencing homelessness in Flagstaff is significantly higher during the summer months

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In January 20120, 45% of homeless individuals, including homeless individuals in families, were White/non-Hispanic and 35% were Native American; all other races and ethnicities accounted for the remaining 20% of homeless individuals. Among families 36% were Native American, 29% were White/non-Hispanic and 18% were White/Hispanic; all other races accounted for the remaining 26% of homeless individuals in families. Among individuals 50% were White/non-Hispanic and 35% were Native American; all other races and ethnicities accounted for the remaining 15% of homeless individuals. In many cases, Native American individuals visit Flagstaff and have no way to get back home; this contributes to the higher number of Native American people experiencing homelessness.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2021 sheltered count reported by the AZ Department of Housing identified 817 sheltered individuals in Coconino County, including emergency shelter, transitional housing, and permanent

supportive housing. At that time and among families there were 280 people in emergency shelter, 69 people in transitional housing, 229 people in permanent supportive housing, and 231 people receiving rapid re-housing assistance including Veterans Affairs Supportive Housing Vouchers. Counts of sheltered families served by victim services agencies are not included in the sheltered count.

The 2020 Balance of State point in time count revealed 151 people in 91 households experiencing homelessness in Coconino County. This count was conducted in January when unsheltered homelessness in Coconino County is relatively low due to inclement weather.

Nearly 1/3 of unsheltered homeless people indicated the primary reason for homelessness was no employment. Other high ranking primary contributors to homelessness were household/ family dispute, insufficient employment, and the high cost of housing.

Discussion:

The Arizona Department of Housing manages the rural Continuum of Care, which includes the Coconino County Continuum of Care and the City of Flagstaff. Homelessness in Flagstaff is most prevalent among single adult men. The number of unsheltered homeless people in Flagstaff in the summer months is more than double the number during the winter months. The high cost of housing combined with insufficient moderate- and higher-wage employment opportunities are primary contributors to homelessness in Flagstaff.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

For purposes of the Consolidated Plan, HUD defines special populations as:

1. Elderly and Frail Elderly People
2. People with Severe Mental Illness
3. People with Mental, Physical and/or Developmental Disabilities
4. People with Alcohol/Other Drug Addictions
5. Persons with HIV/AIDS & their families
6. Victims of Domestic Violence

The CDBG program expressly permits CDBG funding without income qualification for specific categories of people with special needs – referred to as “presumed benefit” - abused children, elderly persons, victims of domestic violence, severely disabled adults, illiterate adults, persons living with AIDS, and migrant farm workers.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly People. Using Coconino County CHAS data and applying proportionate rates of housing needs to Flagstaff residents, there are an estimated 906 elderly low- and moderate-income households with housing problems, including 682 owners of whom 326 have income less than 30% AMI and 224 renters of whom 51 have income less than 30% AMI. Elderly homeowners are most in need of assistance maintaining their homes and accessibility improvements to retain homeownership if desired. Elderly renters are in need of more affordable rental housing in close proximity to transportation and services.

People with Severe Mental Illness. Many SMI individuals are not employed and receive SSI, which in 2014 was \$721/month; individuals with a qualifying disability may receive SSDI and the 2014 average payment was \$1,148/month. Individuals with serious mental illness are particularly vulnerable to homelessness as there are insufficient permanent supportive housing units available and for those who can live independently, and median rents are too high; ADHS reports approximately 3.8% of enrolled people with SMI are homeless.

People with Physical and Developmental Disabilities. Using Coconino County CHAS data and applying proportionate rates of housing needs to Flagstaff residents, there are an estimated 802 LMI households that include a person with a disability who have housing problems, including 679 owners and 123 renters. Many people with disabilities who have housing needs may also be elderly. People with disabilities and their families have layered, complex needs that demand broad strategies and resources. Supportive housing for renters that includes transportation services and provides employment opportunities for people with disabilities would be beneficial as the unemployment rate for people with disabilities is 14.5% - double the rate for the population without disabilities.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly and Frail Elderly People. Using Coconino County CHAS data and applying proportionate rates of housing needs to Flagstaff residents, there are an estimated 906 elderly low- and moderate-income households with housing problems, including 682 owners of whom 326 have income less than 30% AMI and 224 renters of whom 51 have income less than 30% AMI. Elderly homeowners are most in need of assistance maintaining their homes and accessibility improvements to retain homeownership if desired. Elderly renters are in need of more affordable rental housing in close proximity to transportation and services.

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People with Alcohol/Other Addictions. There is no specific data regarding the housing needs of people with alcohol and other drug addictions. Nearly half of people receiving substance abuse services from ADHS are age 26 to 45 and 85% are low income. Based on these demographics, in addition to treatment and related services, people with alcohol and other addictions are most likely to be in need of affordable rental housing.

Victims of Domestic Violence. The most immediate housing need of domestic violence survivors is a safe place to live. Many victims of domestic violence are capable of moving to permanent housing without supports and transitional housing with supportive services such as meals and basic needs, case management, financial coaching, employment preparedness, child care, life skills counseling, and court advocacy is most needed.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Arizona Department of Health Services 2020 Annual HIV/AIDS Report for Coconino County the HIV/AIDS prevalence rate is 188 per 100,000; eight of ten people living with HIV/AIDS are men. The prevalence of HIV/AIDS is higher among people age 35 to 54. According to the 2020 Arizona Statewide Needs Assessment for People Living with HIV/AIDS 55% of respondents to the statewide needs assessment survey reported renting, 17% lived with family or friends, 16% owned their home, and 14% reported being homeless at some time. Nearly half (48%) of survey respondents reported living alone and 38% lived in 2-person households. 75% of individuals receiving services have incomes that qualify as Medicaid eligible. Identified issues for the Northern Region include a widely-dispersed population that includes a large number of Native Americans, geographic challenges of delivering medication and food boxes, holding support groups with enough attendees, and mountainous terrain. The survey identified support groups, housing assistance, mental health services, and emergency financial assistance as the top ranked needs.

Discussion:

The available data provides a good sense of the number of people with various types of disabilities. The data is however not refined enough to accurately estimate service and/or adaptive and supportive housing needs as the number of persons receiving services and already living in adapted units is not available.

There is insufficient room above to fully describe the characteristics and needs of people with special needs. That section is continued here:

People with Alcohol/Other Addictions. There is no specific data regarding the housing needs of people with alcohol and other drug addictions. Nearly half of people receiving substance abuse services from ADHS are age 26 to 45 and 85% are low income. Based on these demographics, in addition to treatment and related services, people with alcohol and other addictions are most likely to be in need of affordable rental housing.

Victims of Domestic Violence. The most immediate housing need of domestic violence survivors is a safe place to live. Many victims of domestic violence are capable of moving to permanent housing without supports and transitional housing with supportive services such as meals and basic needs, case management, financial coaching, employment preparedness, child care, life skills counseling, and court advocacy is most needed.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Needed public facilities located in LMI neighborhoods and/or serving LMI residents and people with special needs include emergency shelters and transitional housing, and facilities providing services to youth, seniors and other special needs populations. The City library foresees a need for expansion to serve individuals experiencing homelessness and youth as school libraries are under-funded. Sustainability and energy efficiency improvements to shelters are also a critical need and several providers have approached the City for assistance.

Respondents to the City's Consolidated Plan survey identified the following priority public facilities needs in Flagstaff:

1. Child Care Centers;
2. Youth Centers;
3. Senior Centers; and
4. Disability Accessibility Improvements.

How were these needs determined?

The City's Capital Improvement Plan is prepared as part of the Annual Budget and Financial Plan and includes capital improvements spanning the coming ten years. Projects in the Capital Improvement Program fall into nine broad categories: general government, streets/ transportation, Flagstaff Urban Trails System (FUTS), arts and science/recreation/beautification, water, stormwater, wastewater, airport, and solid waste. The 5-year Capital Improvement Plan was reviewed to identify public facilities located in LMI neighborhoods and/or serving LMI residents and people with special needs. A survey was conducted for the Consolidated Plan and the results of the 2020 Coconino County Community Health and Human Services Needs Assessment were used to identify other needs of low and moderate income households.

Describe the jurisdiction's need for Public Improvements:

Needed public improvements located in LMI neighborhoods and/or serving LMI residents and people with special needs include ADA Accessibility Improvements and infrastructure for affordable housing projects.

Respondents to the City's Consolidated Plan survey identified the following priority public improvements needs in Flagstaff:

5. Street lighting; and
6. Energy Efficiency Improvements.

How were these needs determined?

The Capital Improvement Plan is prepared as part of the Annual Budget and Financial Plan and includes capital improvements spanning the coming ten years. Projects in the Capital Improvement Program fall into nine broad categories: general government, streets/ transportation, Flagstaff Urban Trails System (FUTS), beautification, water, stormwater, wastewater, airport, and solid waste. The 5-year Capital Improvement Plan was reviewed to identify public improvements located in LMI neighborhoods and/or servicing LMI residents and people with special needs. In addition, a survey was conducted for the Consolidated Plan.

Describe the jurisdiction's need for Public Services:

Records of past funding indicate a need for agency operating support, homeless outreach services, financial education and counseling, housing stabilization assistance, and health services.

Respondents to the City's Consolidated Plan survey identified the following priority public services needs in Flagstaff:

7. Mental Health Services
8. Housing Stabilization Services, and
9. Small Business Assistance.

How were these needs determined?

Public services needs were determined by reviewing past requests for funding, through a survey conducted specifically for the Consolidated Plan and through public meetings conducted for the Consolidated Plan. In addition, a survey was conducted for the Consolidated Plan and the results of the 2020 Coconino County Community Health and Human Services Needs Assessment were used to identify other needs of low and moderate income households.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The housing market consists of homeowners and renters and the units they occupy. In addition to tenure and occupancy, the three primary elements of the housing market that impact supply and demand are:

1. Variety - the types of housing that are available.
2. Quality, - most often defined by age, unit value and whether the unit has complete plumbing or kitchen facilities.
3. Affordability - defined by the percentage of household income that must be spent for housing costs and whether that percentage consumes more than 30% of gross household income.

The Northern Arizona University main campus is located in Flagstaff and has a significant impact on housing availability. Student enrollment at Northern Arizona University Flagstaff campus in 2020 was 29,569, with 22,870 students enrolled full-time. Approximately 7,767 students lived in college dormitories or apartments situated on land owned by NAU, an estimated 18% (5,640) either lived with family or were enrolled in online/remote classes, and an estimated 9,733 students lived off campus. Assuming an average of 2.5 students per open-market rental unit an estimated 3,893 rental units were occupied by students. Students typically pay between \$800 and \$1000 per bedroom, far more than could be earned by renting units to families.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

A variety of housing types is necessary to meet the diverse housing needs and desires of both owners and renters. Housing variety is driven by many factors - primarily demand for certain types of housing and amenities. Other factors that influence housing variety include public policy such as zoning and building requirements, the availability and cost of infrastructure, and the cost of development (land, construction, fees).

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	12,225	46%
1-unit, attached structure	2,825	11%
2-4 units	2,600	10%
5-19 units	4,595	17%
20 or more units	2,580	10%
Mobile Home, boat, RV, van, etc	1,665	6%
Total	26,490	100%

Table 25 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	15	0%	810	6%
1 bedroom	170	2%	2,305	18%
2 bedrooms	1,455	14%	5,490	43%
3 or more bedrooms	8,880	84%	4,170	33%
Total	10,520	100%	12,775	100%

Table 26 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There are 1,255 subsidized low-income rental units in the City of Flagstaff. In addition to the 265 public housing units and 101 affordable rental units owned and operated by the City of Flagstaff Public Housing Authority, there are 888 affordable rental units in 12 apartment complexes funded with the Low Income Housing Tax Credit Program. LIHTC units are generally targeted to households with income less than 60% of the area median income. LIHTC units may be targeted to specific populations, and 60 units are

targeted to elderly and disabled households; the remaining 828 units are targeted to families. There are also 12 HUD-funded Section 202 units serving very-low income people with disabilities.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to information provided by the Arizona Department of Housing there are two affordable housing properties containing 68 units with periods of affordability or use agreements that will expire between 2016 and 2025. A 10-year planning window is used to identify potential lost units to allow sufficient time to plan.

1. Timber Trails Apartments – 64 units funded with Low-income Housing Tax Credits / Bond funds will expire on October 20, 2021. The 64 units in this project include 16 1-bedroom units, 16 2-bedroom units and 32 3-bedroom units.
2. Sharon Manor II Apartments – 4 units funded with State Housing Funds will expire on December 31, 2025.

Does the availability of housing units meet the needs of the population?

There is a general oversupply of units with 3 or more bedrooms and insufficient units with 1 or 2 bedrooms. People have choice of where to live – including units that are too large for their household – and many small owner households choose to occupy housing units with 3 or more bedrooms. With students rooming together off-campus, large families may be challenged to find rental units with adequate bedrooms to comfortably accommodate all members of the family. In addition, VASH Voucher holders seeking 1-bedroom units that meet Housing Quality Standards have been challenged to find quality affordable units.

Describe the need for specific types of housing:

Condominium and townhome units and other attached units that are less costly to develop and suitable for homeownership by families of all sizes are needed, as are higher-density rental units suitable for non-student households.

Discussion

While there is a general over-supply of 3-bedroom units, the Northern Arizona University main campus is located in Flagstaff and has a significant impact on housing availability as an estimated 3,893 open-market rental units are occupied by students, many of them rooming together in larger units. The presence of a large number of students may negatively impact the availability of 3-bedroom and larger rental units suitable for large families.

Condominium and townhome units and other attached units that are less costly to develop and suitable for homeownership by families of all sizes are needed, as are higher-density rental units suitable for non-student households.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Government programs define cost burden as paying more than 30% of gross household income for total housing cost (rent or mortgage and utilities), however this definition is more appropriate to moderate income households than to lower or higher income households. Simply stated, housing cost burdened lower-income households may have little remaining to pay for the essentials – clothing, food, transportation and child care, while higher income households may choose to pay more for housing. Housing cost burden also has costs to the community; when housing costs are high employers may have difficulty attracting and retaining qualified employees.

Cost of Housing

	Base Year: 2015	Most Recent Year: 2019	% Change
Median Home Value	267,400	351,600	31%
Median Contract Rent	940	1265	34%

Table 27 – Cost of Housing

Data Source: 2011-2015 ACS (Base Year), 2015-2019 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	865	6.9%
\$500-999	5035	40%
\$1,000-1,499	5150	41.2%
\$1,500-1,999	1205	9.6%
\$2,000 or more	255	2%
Total	12,510	99.9%

Table 28 - Rent Paid

Data Source: 2015-2019 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	425	No Data
50% HAMFI	1,655	455
80% HAMFI	7,335	1,070
100% HAMFI	No Data	2,205
Total	9,415	3,730

Table 29 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	964	1,024	1,266	1,653	2,003
High HOME Rent	850	912	1,096	1,257	1,383
Low HOME Rent	668	716	860	993	1,108

Table 30 – Monthly Rent

Data Source Comments:
US Dept. of Housing and
Urban Development

Is there sufficient housing for households at all income levels?

2011-2015 CHAS data when compared with 2007-2011 household income and tenure data suggests insufficient rental units affordable to households with income less than 30% AMI and insufficient owner units affordable to households with income 50% to 100% AMI.

College students living off-campus that are supported by their parents appear to be very low income and their presence tends to inflate the number of households with income less than 30% AMI and to inflate the number of cost burdened households. It is however important to ensure adequate rental housing is available for non student households with income less than 30% AMI.

How is affordability of housing likely to change considering changes to home values and/or rents?

While the long-term (2011 to 2015) median home value nearly doubled (98% increase) and the median rent increase was 44%, shorter-term data indicate a 9.6% decrease in home values and a 6% increase in rents from 2011 to 2013. The long-term expectation is that both home values and rents will increase as the housing market continues to recover. Rents are expected to increase more significantly as demand for home purchases is hampered by housing prices that are high relative to household income, decreased investment in second/vacation homes, lack of interest and financial ability to purchase by previously foreclosed homeowners, and changing social values regarding homeownership. Rent increases may be somewhat lower than expected as site plans have been approved for 696 additional rental units that will primarily serve college students; the actual impact of new housing intended for student occupancy will depend on NAU student enrollment, which has been increasing steadily over the past five years.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Fair Market Rents and High HOME rents are comparable to the area median rent, although there is significant variability based on bedroom size. "Low HOME" rents are generally lower than the area

median rent. The relatively low rent associated with “low-HOME” units will impact the City’s strategy to suggest production by developers of new units that are affordable to households with income less than 50% AMI. Other factors, such as vacancy rates, waiting lists for existing affordable housing, potential loss of affordable housing units, the introduction of new student housing, and economic changes will have greater influence on the City’s strategy.

Discussion

During the market cycle from 2000 to 2011 median home values nearly doubled while median contract rents increased 44%. There was significant variability in the housing market during this period, particularly during the housing crisis and Great Recession. Both home values and rents are expected to increase during the next five years, with demand for rental units expected to drive greater rent increases and lower demand for owner units expected to result in moderate home value increases.

There are insufficient units affordable to owners and potential purchasers with income 50% to 100% AMI. 67% of renter respondents to the 2020 Coconino County Community Health and Human Services Needs Assessment indicated they would like to own a home but insufficient down payment and availability in their price range were barriers to homeownership. There are also insufficient rental units affordable to renters with income less than 30% AMI.

Rents established by HUD for the HOME program, which finances rehabilitation and new construction and for the Section 8 program, which provides monthly rental subsidies to low-income renters do not vary significantly from the area median rent due to the high volume of one and two bedroom rental units in Flagstaff. Rehabilitated or new units targeted to very low income renters would have positive impacts on the availability of affordable housing.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Housing quality encompasses a range of issues that are central to quality of life including housing safety, design and appearance, maintenance and energy efficiency, and community safety and livability. The quality of the existing housing stock reflects economic prosperity and pride of community.

The age of the housing stock is one indicator of housing quality. While many older housing units have been well-maintained and lovingly restored, other older housing units may have been built to outdated building codes using materials and construction techniques that are no longer considered safe or sustainable. Older housing units may be less energy efficient, resulting in higher utility costs for occupants. In addition, some materials, such as lead (in units built prior to 1978) and asbestos may be health hazards to unit occupants.

Definitions

A substandard housing unit is defined by HUD as lacking complete plumbing or kitchen facilities. HUD also requires the City to define standard condition and substandard condition but suitable for rehabilitation. These definitions are used in determining the eligibility of a housing unit for rehabilitation using CDBG funds.

- *Standard Dwelling Unit.* A dwelling unit that meets or exceeds HUD Housing Quality Standards (HQS) and local building codes with no major defects in the structure and only minor maintenance required. A standard dwelling will have a reliable roof; sound foundation; adequate and stable floors, walls and ceilings; surfaces and woodwork that are not seriously damaged; sound windows and doors; adequate heating, plumbing and electrical systems; and adequate water and sewer systems.
- *Substandard Dwelling Unit Suitable for Rehabilitation.* A dwelling unit that does not meet HUD Housing Quality Standards (HQS) and local building codes and has a major structural deficiency and/or is lacking one of the following: complete plumbing or kitchen facilities; efficient and environmentally sound sewage removal and water supply; a proper heating source; or is without electricity or adequate and safe electrical service yet has basic infrastructure that allows for economically and physically feasible improvements that will result in the unit meeting the definition of a standard dwelling upon completion of rehabilitation.
- **Condition of Units**

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,300	22%	6,925	54%
With two selected Conditions	30	0%	610	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
No selected Conditions	8,185	78%	5,245	41%
Total	10,515	100%	12,780	100%

• Table 31 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,740	26%	2,860	22%
1980-1999	3,880	37%	5,270	41%
1950-1979	3,305	31%	4,040	32%
Before 1950	590	6%	610	5%
Total	10,515	100%	12,780	100%

Table 32 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,895	37%	4,650	36%
Housing units built before 1980 with children present				

Table 33 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	17,100
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 34 - Vacant Units

Data Source: 2005-2009 CHAS

Vacant Housing Units

There is no data available regarding the number of vacant abandoned buildings and whether these buildings are suitable for rehabilitation. Overall vacancy rates are extremely low.

Need for Owner and Rental Rehabilitation

The data provided by HUD on "condition of housing" is not particularly useful in estimating the number of housing units needing rehabilitation. The data on condition of units is the sum of four housing conditions: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, and 4) cost burden greater than 30%. Conditions 3 and 4 are not directly relevant to the physical condition of the unit, although overcrowding and cost burden can lead to substandard housing. The only one of these four conditions with significant numbers is cost burden.

Complete kitchen facilities include a) cooking facilities, b) refrigerator, and c) a sink with piped water. Complete plumbing facilities include a) hot and cold piped water, b) a flush toilet, and c) a bathtub or shower. US Census data indicates there are a total of 37 units in Flagstaff that lack complete plumbing facilities and 192 that lack complete kitchen facilities; many of these units may be illegal accessory dwelling units.

The City's experience with its owner-occupied housing rehabilitation indicates that most units are in need of roofing, electrical and plumbing upgrades, hot water heaters and heating units. Public input from the City's survey indicates that deferred maintenance is occurring in the City's older neighborhoods where rental housing predominates.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

HUD did not provide data showing the number of pre-1980 housing units by income level. Based on the income breakouts provided by HUD for families in the needs assessment, an estimated 38% or 3,065 units with LBP hazards are occupied by low and moderate income families and 865 are occupied by low and moderate income families with children.

Discussion

Housing units that are 30 years old or older are more likely than the newer housing stock to require rehabilitation or replacement, historic preservation, lead-based paint remediation, and energy efficiency improvements. There are 8,106 units that were built before 1980 and are more than 30 years old; this represents 36% of housing units. Renters and owners are equally likely to occupy pre-1980 housing units, with renters slightly more likely to occupy units built before 1950.

HUD data indicates that 2,290 pre-1980 housing units are occupied by households with children – 60% by renters and 40% by owners. Childhood lead poisoning is a serious pediatric health problem and children ages six years and younger are particularly susceptible to lead poisoning. Research indicates that even a low level of lead in a child's blood can have harmful effects on physical and developmental health. The most common source of exposure is deteriorating lead-based paint and lead-contaminated dust found in the home, but other sources include pottery, jewelry, candy and makeup.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 housing choice vouchers, 106 Veterans Affairs Supportive Housing Vouchers, , 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability. The public housing units are in good repair as the Housing Authority follows a system of ensuring that all major systems are in good repair. The Housing Authority develops a 5-year Plan to identify the capital needs of public housing developments and the methods by which living conditions will be improved for public housing residents.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	12	265	481	0	333	106	2	40
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 35 – Total Number of Units by Program Type

Data: Flagstaff Housing Authority
Source:

Describe the supply of public housing developments:

The public housing program is accepting applications and the approximate wait time 6 months to 4 years for public housing. The waiting list for the Housing Choice Voucher Program is currently closed (except for special programs) and the approximate wait time is 1 and ½ to 3 years or more for a Housing Choice Voucher. The City of Flagstaff would benefit from additional public housing developments.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The City of Flagstaff Housing Authority provides 265 public housing units and 12 mod-rehab units. The remainder of the units are scattered throughout the community. All major systems within the developments are in good repair due to an established life cycling system.

Public Housing Condition

Public Housing Development	Average Inspection Score
Flagstaff Housing West (AZ006001) last inspected 10/1/18	92
East Flagstaff Housing (AZ006002) Last inspected 11/6/19	72

Table 36 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

All major systems within the developments are in good repair due to an established life cycling system. Needs identified in the Five Year Capital Plan include replacing water lines, siding, roofs, water heaters and countertops.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Flagstaff Housing Authority lists multiple goals and strategies for improving the living environment for families in public housing:

Goal Two: Provide a safe, drug free and secure environment in CFHA's public housing developments.

Objectives:

1. CFHA shall continue to maintain practices which encourage low crime rates in its developments. This will be accomplished by continuing to contract with the Flagstaff Police Department to have a full-time officer assigned to our developments.
2. Monitor and maintain our rate of eviction due to violations of criminal law by maintaining thorough screening policies and procedures that balance the need for public safety with resident rights protected under HUD's Disparate Impact Memo

Goal Three: Maintain the CFHA's real estate in habitable, safe, decent and sanitary conditions.

Objectives:

1. CFHA shall maintain a resident friendly, non-institutional and accessible environment in its developments as measured by regular customer surveys and formal annual resident input and participation.
2. CFHA shall maintain public housing units in compliance with all local and HUD requirements. This will be accomplished as follows:
 - a. Continue to use Capital Funds to maintain facilities, and systems, improve accessibility in homes and on the grounds and replace aging equipment.
 - b. Provide training on an annual basis for Maintenance Staff to allow them to grow professionally.
 - c. Provide training prior to occupancy for public housing residents in the care for and use of their residence.
 - d. Place emphasis of quality of unit turnover ahead of speed of unit turnover

e. Explore options to redevelop and expand affordable housing stock including HUD's Rental Assistance Demonstration (RAD) program.

Goal Five: Ensure community connectivity to services, facilities and amenities is maintained and enhanced as appropriate. This includes physical linkages to area parks, the Flagstaff Urban Trail System (FUTS) and other community amenities, as well as interactions with area schools and organizations..

Objectives:

1. Utilize the Siler Homes Activity Center as a base for various resident services
2. Work toward expanding staff knowledge of and relationships with community programs, family and youth services and activities to include job related training and career developments to allow them to provide accurate and appropriate referrals. Page 4 of 9 form HUD-50075-5Y (12/2014)
3. Seek to continue to work with our community partners to provide youth activities and drug prevention programs.
4. Continue to contract with the Flagstaff Police department to have a full-time officer assigned to our developments to promote Community based policing to minimize criminal and drug activity This program has been extremely successful over the years.
5. Continue to partner with Head Start to provide early childhood education at our sites.

Additionally, the Housing Authority has multiple goals and objectives created to increase resident involvement including: ongoing surveys and formal annual resident input and participation to ensure the public housing environment is appealing and up-to-date; providing maintenance and repair training prior to occupancy; continuing resident education; partnering with the Boys and Girls club and the City Recreation Department to provide free on-site programs; and resident meetings, barbeques and newsletters to help residents with education, employment, job training and youth services.

The City Housing Authority produces a monthly newsletter for public housing residents. Newsletter content includes food and utility assistance, library programming, free tax assistance information, healthcare marketplace information, regular deadlines for rent and recertification submission, public notice regarding policy changes, and countless other resources.

Discussion:

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 housing choice vouchers, 106 Veterans Affairs Supportive Housing Vouchers as well as 2 Foster Youth Initiative vouchers (with a remaining capacity of 23) and 40 Mainstream Vouchers for non-elderly households that include an adult with a disability. The public housing units are in good repair as the Housing Authority follows a system of ensuring that all major systems are in good repair. The Housing Authority develops a 5-year Plan to identify the capital needs of public housing developments and the methods by which living conditions will be improved for public housing residents.

MA-30 Homeless Facilities and Services – 91.210(c)

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Ten agencies in Flagstaff provide over 780 beds for people experiencing homelessness. Beds include emergency shelter beds where the stay is typically limited to a short duration, transitional housing beds where occupancy is from six to twenty-four months, and permanent supportive housing where occupancy is long term and includes supportive services necessary for people to live independently. Permanent supportive housing includes rapid re-housing assistance and Veterans Affairs Supportive Housing Vouchers.

Because Coconino County currently has the largest number of shelter beds in rural Arizona it receives limited resources for additional beds from the rural Continuum of Care. Without additional permanent supportive housing beds, the City will be challenged to move people from homelessness to permanent supportive housing.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	39	0	33	74	0
Households with Only Adults	232	0	29	98	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	70	0
Unaccompanied Youth	13	0	0	0	0

Table 37 - Facilities and Housing Targeted to Homeless Households

Data Source
Comments:

Arizona Department of Housing Rural Continuum of Care for Coconino County

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Coconino County Continuum of Care providers utilize all available mainstream services to complement services specifically targeted to homeless persons. Mental Health services are generally provided by the Northern Arizona Behavioral Health Authority, The Guidance Center, Southwest Behavioral Health, and Northland Family Health Center. Health Care services are provided by Community Health Centers, the Flagstaff Regional Medical Center, and the Poore Clinic that provides free health care to uninsured and underinsured people. Homeless persons, like other low-income individuals, are also referred to job training and placement services administered through the Coconino County Workforce Investment Board.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Facilities and services that meet the needs of homeless persons are included in the unique appendices. In addition to facilities serving people experiencing homelessness, Flagstaff Shelter Services partners with The Refuge, a nonprofit organization, to provide overflow shelter services during the winter months. The Refuge solicits the help of local churches to open their doors in the evening to provide overflow shelter for as many weeks as possible. The Refuge provides transportation to and from the shelter and volunteers who stay the night at the church. The shelter provides the liability responsibility, the staff and organization for the volunteers at the churches. Besides offering shelter, the goal is to connect people with services. The overflow shelter also supports a more accurate point-in-time count to ultimately ensure that adequate resources are effectively used to stabilize people sufficiently for more permanent housing.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The Flagstaff Housing Authority is a major provider of housing for low-income elderly people and persons with disabilities. The Housing Authority provides public housing for 67 low-income elderly people and people with disabilities and provides Housing Choice Vouchers to an additional 181 elderly people and people with disabilities.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Upon retirement, many lower-income elderly persons may need subsidized accessible housing due to decreased mobility as they age. Frail elderly people may need a unit with an extra room for a personal care attendant or may need additional services. Persons with disabilities may need a group home with room for live-in service providers or assisted living opportunities. Persons with HIV/AIDS and persons with alcohol and other drug addictions may need a subsidized housing unit near their health care providers.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Clients are generally not allowed to be discharged from institutions, including mental health, drug and alcohol treatment, jails and prisons without a clear post-discharge housing plan. However, the experience of shelter and service providers is that despite best efforts on the part of these institutions, some clients often have nowhere else to go and end up on the streets, in shelters or in temporary arrangements with friends or relatives. This is particularly true of ex-offenders and people with untreated drug and alcohol problems who may be restricted from occupancy in public or subsidized housing due to crime and drug-free housing policies. The Guidance Center continues its leadership role in the Closing the Gap initiative which brings together a variety of community stakeholders who collaborate on strategies to mitigate the impacts of chronic alcoholism and ensure people with chronic alcoholism are directed to and receive appropriate services that can lead to permanent housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City plans to continue to operate public housing and Section 8 housing choice voucher programs targeted to people with special needs who are not homeless.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City plans to continue to operate public housing and Section 8 housing choice voucher programs targeted to people with special needs who are not homeless.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Affordable housing barriers are regulatory or financial systems that make it harder for developers to create affordable housing. Barriers to affordable housing development can occur at many levels – local, state and federal government, as well as in related industries, such as the real estate, insurance and finance industries.

HUD defines a regulatory barrier as "a public regulatory requirement, payment, or process that significantly impedes the development or availability of affordable housing without providing a commensurate health and/or safety benefit." To identify potential local public barriers to affordable housing development, the City completed HUD's Regulatory Barriers checklist. Based on the checklist, the City identified three potential local public barriers to affordable housing development:

1. Has not adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings.
2. Has not instituted a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental and related permits.
3. Does not provide for expedited or "fast track" permitting and approvals for all affordable housing projects in the community.

The first barrier is the only barrier that could negatively impact the development of affordable housing in Flagstaff. The present permit application process does not require the developer to obtain approvals from separate departments, rather when an application is submitted the various permits are handled internally. State law requires the City to permit and approve all developments within a specified time frame, negating the necessity of providing for fast track permitting and approvals for affordable housing projects.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The HUD tables provide some basic data on Flagstaff's workforce, its economy and education. Flagstaff has a high percentage of its workforce with college or advanced degrees, largely due to the presence of Northern Arizona University. However, Flagstaff also has a fairly large number of younger working age residents who are unemployed or employed in low-wage jobs.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	244	72	1	0	-1
Arts, Entertainment, Accommodations	5,250	6,307	24	23	-1
Construction	1,251	1,144	6	4	-2
Education and Health Care Services	5,094	7,800	23	29	6
Finance, Insurance, and Real Estate	917	819	4	3	-1
Information	254	245	1	1	0
Manufacturing	2,534	4,045	12	15	3
Other Services	738	813	3	3	0
Professional, Scientific, Management Services	1,001	1,071	5	4	-1
Public Administration	0	0	0	0	0
Retail Trade	3,434	3,978	16	15	-1
Transportation and Warehousing	558	374	3	1	-2
Wholesale Trade	648	338	3	1	-2
Total	21,923	27,006	--	--	--

Table 38 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	38,820
Civilian Employed Population 16 years and over	35,910
Unemployment Rate	7.52
Unemployment Rate for Ages 16-24	21.86
Unemployment Rate for Ages 25-65	2.99

Table 39 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	8,175
Farming, fisheries and forestry occupations	1,635
Service	4,220
Sales and office	9,240
Construction, extraction, maintenance and repair	1,970
Production, transportation and material moving	1,465

Table 40 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	30,175	89%
30-59 Minutes	2,445	7%
60 or More Minutes	1,235	4%
Total	33,855	100%

Table 41 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,525	115	850

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	3,450	65	1,155
Some college or Associate's degree	7,755	430	1,775
Bachelor's degree or higher	10,815	280	1,570

Table 42 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	25	235	145	355	280
9th to 12th grade, no diploma	910	490	395	870	265
High school graduate, GED, or alternative	4,350	1,335	1,260	2,090	890
Some college, no degree	12,045	2,470	1,765	2,760	885
Associate's degree	1,215	1,250	595	1,115	265
Bachelor's degree	1,560	3,015	1,940	2,495	1,145
Graduate or professional degree	65	1,295	1,195	2,725	1,410

Table 43 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,118
High school graduate (includes equivalency)	24,891
Some college or Associate's degree	30,755
Bachelor's degree	35,745
Graduate or professional degree	51,776

Table 44 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Education and health care services are by far the largest employment sectors in Flagstaff, employing 21% of all workers who live in Flagstaff. Arts, accommodations and recreation also employ 21% of

Flagstaff workers; however, many of these jobs are not full-time jobs. Retail trade (15%) and Manufacturing (11%) are also relatively high employment sectors. Together, these four sectors employ two-thirds of Flagstaff workers.

Describe the workforce and infrastructure needs of the business community:

Flagstaff's business community is seeking a mix of educated professionals, a workforce with manufacturing skills as well as a workforce with entry-level skills to fill numerous retail and accommodations sector jobs. Continued growth of NAU and growth in the health services sector may lead to demand for more professionals in the education and health care sectors.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

There are no large-scale investments or initiatives that will affect job and business growth opportunities during the next five years. Community Development staff is analyzing the 1992 Redevelopment Area Plan to determine whether an update is necessary; an update could result in new redevelopment opportunities.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Considering the relatively low unemployment rate (3.18%) among 25 to 65 year olds, it first appears that there is little mismatch between skills and education and employment opportunities. However, the large number of people with Bachelor's Degrees (10,390) or some college (7,864) does not match with the largest occupation – sales and office – meaning that many employed workers are likely to be underemployed based on their education alone. Data from the Coconino County Workforce Business Plan indicates that only 14% of employees in the sales and office sector need a Bachelor's Degree or higher. Input received during the consultation process also suggests that the emphasis on college education is not a match for many of the jobs that are available. Local employers continue to say they struggle finding a workforce with the skills needed for their openings. The increasing use of technology in the workplace and the growing complexity of skills needed to effectively use new technology advances make it challenging.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Local workforce development leaders have teamed up to design and implement several initiatives that show promise as foundations upon which to build a more consolidated system.

There are currently four One Stop Centers in the County that involve multiple partners.

Coconino County, DES, Chamber of Commerce, Northern Arizona University (NAU),

Sunnyside Neighborhood Association, Goodwill of Northern Arizona, the Economic

Collaborative of Northern Arizona (ECoNA) and Coconino Community College all partner with each other to design training programs that meet employer needs, promote business retention and expansion, join together to realize success in Arizona Commerce Authority

(ACA) projects, and offer Rapid Response services for downsizing or closing companies.

An important partner in the Coconino County One Stop System is the Senior Community Service Employment Program (SCSEP). SCSEP works with people 55 and over and also with people with disabilities. The training offered is designed to help people in those categories gain employment more readily.

The needs of jobs seekers and employers are met through the One Stop System, which addresses skill gaps through job readiness workshops, interviewing workshops, basic computer classes, computer tutoring and Microsoft Office workshops. The Career Center funds training for the Health Services industry sector through its partnership with the Coconino Community College and NAU School of Nursing. They assist individuals obtain the certifications in this field such as Certified Nursing Assistant, Registered Nurse, Medical Assistant, Pharmacy Technician, Medical Billing & Coding and Caregiver. The Coconino Career Center has a successful history of working with business and training partners to develop customized training for new and expanding business opportunities in the area.

Supportive services to enable successful completion of training may include assistance with costs of housing, utilities, transportation, child care, clothing/uniform, or tools necessary for employment. These efforts will support the Consolidated Plan by providing necessary support services for some individuals who would otherwise be in need of public services. Additionally, any CDBG investment in employment/job readiness services will support the current system.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

In addition to the above data, low and moderate income respondents to the 2020 Coconino County Community Health and Human Services Needs Assessment indicated that livable wages are the primary concern. As noted above, there is a mismatch between the high education levels of Flagstaff workers and the entry-level employment opportunities that are available. By targeting any CDBG investment in public services that improve basic skills, job readiness and employment search services, the City can supplement existing efforts.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

According to HUD CPD Maps, there are nine Census Tracts where at least 38.4% of households have one or more housing problems. A concentration is defined as 10% greater than the citywide proportion of 28.48% of households. High concentration Census Tracts are Census Tract 3 (57.85%), Census Tract 8 (59.67%), Census Tract 11.02 (59.29%), Census Tract 2 (39.67%), Census Tract 10 (73.03%), Census Tract 9 (48.95%), Census Tract 12 (54.62%), Census Tract 4 (38.89%) and Census Tract 5 (43.08%).

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

An area of low-income concentration is defined as an area where at least 51% of the population has income below 80% of the area median income. There are 26 Census Block Groups where low-income populations are concentrated based on LMI Census data provided by HUD. Considering only Census Tracts there are 7 Census Tracts where low-income populations are concentrated – Census Tracts 2, 3, 5, 8, 10, 12 and 15. Appendix 1 includes tables demonstrating the Census Block Groups with a concentration of low-income and/or racial or ethnic minorities.

There are 18 Census Block Groups in Flagstaff that are considered areas of minority concentration based on 2010 Census data. An area of minority concentration is defined as an area where the proportion of minorities (non-White) is at least 10% higher than the proportion of that minority group citywide. 10 of the Census block Groups include or are adjacent to Northern Arizona University (NAU). NAU students account for all of the Pacific Islander population, 43% of the Black/African American population, 20% of the Asian population, and 20% of the Hispanic population. Considering only Census Tracts there are 5 Census Tracts where minority populations are concentrated – Census Tracts 3, 4, 5, 8, and 11.02. Census Tracts 3, 5 and 8 are also low-income concentration areas

What are the characteristics of the market in these areas/neighborhoods?

These areas are characterized by a larger proportion of non-family households, including single-person households and 2 to 4 unrelated people living together. One of four householders is age 15 to 24. More than six of ten (63%) households are renter households. Large family households are also slightly more likely to live in these areas. Census Tracts 8 and 10 have historically been Qualified Census Tracts for purposes of the Low Income Housing Tax Credit program.

Are there any community assets in these areas/neighborhoods?

There are significant community assets in these areas including: education and employment opportunities, public transportation, health and mental health services, recreation, and affordable

housing. There is also great diversity of housing types and land uses ranging from single-family homes to high density apartment complexes and commercial uses and historic areas suitable for preservation and enhancement. Target neighborhoods have active neighborhood groups that advocate for appropriate reinvestment, compatible design and preservation of neighborhood character.

Are there other strategic opportunities in any of these areas?

Neighborhood/area plans are in place for the Sunnyside and La Plaza Viejo areas. Identified strategic opportunities include:

1. Floodplain, roadway, parking, streetscape improvements and improvements to increase walkability.
2. Encouraging context-appropriate development in the transition area between neighborhood and commercial corridors.
3. Enhancing the commercial edges, incorporating residential scale details on the building elevation facing residential areas and the neighborhood core.
4. Preserving and enhancing the existing housing stock, including piloting a rental rehabilitation program in the La Plaza Viejo neighborhood
5. Infill development to create improved systems of open space, transportation and buildings, and increase the rate of homeownership.
6. Attraction of appropriate neighborhood level retail.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Broadband access in communities helps provide economic growth, improved educational opportunities, access to better healthcare, greater employment opportunities, improving public safety, and increased global competitiveness for businesses.

The term broadband commonly refers to high-speed Internet access that is always on and faster than the traditional dial-up access. Broadband includes several high-speed transmission technologies such as: digital subscriber line (DSL), cable modem, fiber, wireless, satellite, and broadband over power lines (BPL).

Research among Organization for Economic Co-operation and Development (OECD) countries shows that a 4 Mbps increase in household broadband speed is associated with a roughly 4 percent increase in household income. Research shows that businesses who begin utilizing broadbands increase their employees' labor productivity of an average 5 percent in the manufacturing sector and 10 percent in the services sector.

The current standard for broadband in the U.S. is internet with a 25 Mbps (Megabits per second) download speed. Though Netflix says it needs only 5 Mbps to stream video, the 25 Mbps threshold is intended to satisfy the different needs; high-quality downloads, video communication, and multiple demands of a single household's network.

However, there are still a large number of Americans unable to access broadband at the speeds necessary to make full use of its benefits. Federal Communications Commission (FCC) and National Telecommunications and Information Administration (NTIA) datasets clearly demonstrate these significant gaps in access to broadband infrastructure:

- 10 percent of all Americans (34 million people) lack access to 25 Mbps/3 Mbps service.
- 39 percent of rural Americans (23 million people) lack access to 25 Mbps/3 Mbps.
- By contrast, only 4 percent of urban Americans lack access to 25 Mbps/3 Mbps

broadband.

- The availability of fixed terrestrial services in rural America continues to lag behind urban America at all speeds: 20 percent lack access even to service at 4 Mbps/1 Mbps, down only 1 percent from 2011, and 31 percent lack access to 10 Mbps/1 Mbps, down only 4 percent from 2011.
- Americans living in rural and urban areas adopt broadband at similar rates where 25 Mbps/ 3 Mbps service is available, 28 percent in rural areas and 30 percent in urban areas.

In December of 2017, HUD published the final rule, "Narrowing the Digital Divide Through Installation of Broadband Infrastructure in HUD-Funded New Construction and Substantial Rehabilitation of Multifamily Rental Housing." HUD is actively working to bridge the digital divide in low-income communities served by HUD by providing helping with the expansion of broadband infrastructure to low- and moderate-income communities. The final ruling requires installation of broadband infrastructure at the time of new construction or substantial rehabilitation of multifamily rental housing that is funded or supported by HUD. Additionally, CDBG entitlement communities are required to provide an analysis of the needs of the broadband needs of housing occupied by low- and moderate-income households.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The FCC Fixed Residential Broadband Providers Map displays data showing the number of providers reporting residential fixed broadband in Flagstaff. The map shows the number of providers available with the most recent data from December 2018 with >25/3 Mbps. The City has complete coverage with diverse broadband providers for residents to choose from. While several broadband providers are available to residents, low- and moderate-income census neighborhoods have a low percentage of households subscribing to broadband. Some residents may be accessing internet service utilizing their mobile phone and the data from 2014-2018 may be out of date. The average download speed in Surprise is 49.22 Mbps. This is 19.7% slower than the average in Arizona and 12.6% slower than the national average. BroadbandNOW reports the following about broadband internet service providers in Surprise: • There are 6 internet providers in Flagstaff with 4 of those offering residential service. • Approximately 89% of Flagstaff residents are serviced by multiple wired providers. • The average internet download speed in Arizona is 61.29 Mbps. • Fiber optic internet is available to just 38% of Coconino County residents. • In Coconino County, approximately 58,000 people do not have access to 25mbps wired broadband. • There are 13 companies offering business internet services in Flagstaff.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

While climate change is expected to lead to warmer temperatures in both winter and summer in the southwest, there is no clear signal for whether there will be a corresponding increase or decrease in precipitation in this region. Over the past 22 years, Arizona has experienced a prolonged drought occasionally punctuated by a wetter than normal year, which is quite typical for an arid climate. This arid region is characterized by extreme weather events particularly extremes in temperature and precipitation. During the past 22 years, there has been a gradual warming, potentially related to the drought that has resulted in an increasing number of winter rain events, rather than snow. However, there have also been several extremely heavy snow events across Coconino County lasting from 3 to 6 days. While the global climate models and the downscaled regional models call for warmer temperatures by 2030, 2050, and 2100, they provide no guidance for extreme weather events in the 2-10 year time interval of hazard mitigation plan updates. Even the past record of extreme events has so few occurrences that statistical modeling is not a viable option, and the data do not indicate a progression toward more frequent or more intense events. At this time there is insufficient actionable climate information on which to base mitigation actions. Therefore, most of the mitigation actions in this plan update are based on historical extreme weather events.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Flagstaff's Regional Plan identifies a policy to address natural hazards such as wildfire, flooding, unstable soils, seismic or subsidence areas, high winds, and steep slopes among other hazards. The strategies developed to address this policy includes increasing public awareness, hazard identification, design for public safety, redevelopment plans, cooperative planning efforts, limit development in hazard areas, structural hazard mitigation, and wildfire fuel reduction among other strategies.

The City continues to focus energy and resources on helping to ensure that residents, particularly the elderly, are safe during times of extreme weather and wildfire season.

Housing rehabilitation programs, supported with CDBG funds, helps to ensure that low- and moderate income home owners are able to access financial resources to replace heating systems.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Housing is an important issue to Flagstaff as a community. The limited supply of housing for low and moderate-income families and individuals affects quality of life and the ability to grow and develop economically as a community. The Housing Section works to address this shortage with a number of programs and tools designed to:

1. Increase housing inventory and availability;
2. Economically stabilize lower-income families through benefits of homeownership;
3. Support efforts for safe and adequate homes;
4. Revitalize community neighborhoods.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 45 - Geographic Priority Areas

1	Area Name:	Citywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Other
	Other Revital Description:	Any location in the City of Flagstaff
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	La Plaza Vieja
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	

	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
3	Area Name:	Pine Knoll
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
4	Area Name:	Southside
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	

	Are there barriers to improvement in this target area?	
5	Area Name:	Sunnyside
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City annually accepts proposals from agencies interested in providing services and/or facilities for low and moderate income households, people experiencing homelessness and people with special needs. The City's funding includes priority to geographic target areas, among other priorities.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 46 – Priority Needs Summary

1	Priority Need Name	Revitalization, Public Facilities & Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide
	Associated Goals	Facility Improvements ADA Accessibility Improvements Land Acquisition for Affordable Housing Dev Infrastructure for Affordable Housing
	Description	Improvements to public facilities; improvements in target neighborhoods; and activities to support the development of affordable rental and homeownership units.
	Basis for Relative Priority	Revitalization, public facilities and improvements and infrastructure in support of affordable housing development are supported by past records of funding, the community/stakeholder survey conducted for the Consolidated Plan, public and stakeholder input, and the planned activities of subrecipients of CDBG funds.

2	Priority Need Name	Public Services and Economic Opportunities
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide
	Associated Goals	Service and Facility Operating Support Employment & Job Training Support Housing Stabilization Services
	Description	Activities that provide support to low and moderate income households, people living below the poverty level, people with special needs and people experiencing homelessness.

	Basis for Relative Priority	Public services and economic opportunity supports are supported by past records of funding, the community/stakeholder survey conducted for the Consolidated Plan, public and stakeholder input, and the planned activities of subrecipients of CDBG funds.
3	Priority Need Name	Addressing Homelessness
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Facility Improvements Operating Support Emergency Shelter Permanent Supportive Housing
	Description	Activities to prevent homelessness, reach out to people experiencing homelessness, and provide facilities and services for people experiencing homelessness.
	Basis for Relative Priority	Addressing homelessness is supported by past records of funding, the community/stakeholder survey conducted for the Consolidated Plan, public and stakeholder input, and the planned activities of subrecipients of CDBG funds.
	Priority Need Name	Decent Affordable Housing
4	Priority Level	High

Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents
Geographic Areas Affected	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide
Associated Goals	Land Acquisition for Affordable Housing Dev Infrastructure for Affordable Housing Owner-occupied Housing Rehabilitation Rental Housing Construction Owner Housing Construction First-time Homebuyer Assistance Rental Housing Rehabilitation
Description	Affordable rental and homeownership housing units for low and moderate income households.
Basis for Relative Priority	Decent affordable housing supported by past records of funding, the community/stakeholder survey conducted for the Consolidated Plan, public and stakeholder input, data contained in the housing needs assessment and market analysis, and the planned activities of subrecipients of CDBG funds.

Narrative (Optional)

Through data analysis, a community/stakeholder survey, public and stakeholder consultation and review of past records, the City of Flagstaff has identified four priorities for the use of CDBG funds over the next five years.

Public and stakeholder input, records of past funding, the needs assessment and market analysis, and the City's General Plan and Capital Improvements Plan are used to determine the relative priority of activities and the populations that will be served.

HUD allows two priority designations – high and low. Assignment of priority does not reflect a lack of need for any particular population or activity; it merely identifies those conditions that are most likely to be addressed with limited CDBG funding. All priority needs, regardless of priority designation of high or

low, are considered consistent with the City Consolidated Plan for the purpose of issuing consistency letters to third parties.

- High priority activities are likely to be funded with CDBG resources during the next five years.
- Low priority activities may be funded as opportunities arise.

The table summarizes planned CDBG activities and the priority level and 5-year numeric goal for each. Activities that will be targeted to non-homeless special populations include revitalization, public facilities and infrastructure; and public services and economic opportunities.

5-year Consolidated Plan Goals			
Activity	Special Population	Priority Level	5-year Goal
<u>Priority Need:</u> Neighborhood Revitalization, Public Facilities & Infrastructure			
Neighborhood Facility and Infrastructure Improvements <i>Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.</i>		High	3,000 people
Public Facilities <i>Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.</i>	X	High	100 people
Acquisition for Affordable Housing Development <i>Land/ Real Property/ Etc.</i>		Low	3 units
<u>Priority Need:</u> Public Services & Economic Opportunities	Special Population	Priority Level	5-year Goal
Services to Meet Basic Needs <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>	X	High	300 people
Workforce Development <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>	X	Low	15 people
Housing Stabilization <i>Includes Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services/ Housing Counseling/ Etc.</i>		High	50 households
<u>Priority Need:</u> Addressing Homelessness	Special Population	Priority Level	5-year Goal

Service and Facility Operating Support <i>Includes Outreach/ Shelter Managers / Case Managers/ Coordinated Entry/ Etc.</i>	X	High	1,500 people
Increase Shelter Beds/Units <i>Includes Emergency / Transitional Shelter/ Permanent Supportive Housing/ Etc.</i>	X	High	15 beds
<u>Priority Need:</u> Decent Affordable Housing	Special Population	Priority Level	5-year Goal
Housing Rehabilitation <i>Includes Owner and Renter Housing</i>	X	High	20 units
Housing Development <i>Includes Owner and Renter Housing</i>	X	High	3 units
Housing Assistance <i>Includes Owner and Renter Housing</i>		High	50 households

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	3,620 low and moderate income households are cost burdened.
TBRA for Non-Homeless Special Needs	3,620 low and moderate income households are cost burdened and may be in need of supportive services.
New Unit Production	Insufficient units affordable to low and moderate income renters and potential homeowners.
Rehabilitation	8,100 units built before 1980. 120 households occupy substandard housing.
Acquisition, including preservation	Insufficient units affordable to low and moderate income renters and potential low and moderate income homeowners.

Table 47 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The amount of CDBG funding received by the City varies from year-to-year based on the Federal Budget. The City expects to receive between \$510,000 and \$650,000 year during each of the next five years. The Annual Action Plan describes City allocations for the CDBG program during the coming year. These allocations fund activities to address goals for the primary Consolidated Plan areas: Affordable Housing, Homelessness, Community Development, Special Needs and Citizen Participation.

Additional federal funds to address goals are made available for public housing and programs addressing the needs of people experiencing homelessness. State government, local general funds and private resources are sometimes secured by the City or by local agencies for a variety of uses.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$571,367	\$278,216	\$39,190.17	\$883,773.17	\$2,285,468	The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons.

Table 48 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will leverage possible additional resources to rehabilitate and/or develop affordable housing for renters or owners, to provide services to vulnerable populations including people

experiencing homelessness, people living in poverty, and other people with special needs. When funding has matching requirements, match may be satisfied through local fund raising by nonprofit organizations, State Housing Trust Funds, and City General Funds.

It should be noted that the below resource are funding not administered by the City of Flagstaff. Furthermore, the allocations will vary annually as will supplemental resources that will be used to leverage projects. Federal, State and Local funds may be leverage for a variety of uses for programs addressing the needs of people experiencing homelessness. Estimated leverage amounts over the five year period include:

Federal Sources:

- Continuum of Care – approximately \$600,000 per year - The Continuum of Care (C o C) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
- Public Housing Capital Fund – approximately \$230,000 per year - The Capital Fund provides funds, annually, to Public Housing Agencies (PHAs) for the development, financing, and modernization of public housing developments and for management improvements.
- Section 8 Housing Choice Vouchers – approximately \$3.4 million per year - Housing choice vouchers allow very low-income families to choose and lease or purchase safe, decent, and affordable privately-owned rental housing.

State:

- State Housing Trust Fund - approximately \$150,000 per year - The Arizona Department of Housing combined Federal HOME resources from the U.S. Department of Housing and Urban Development (HUD) with state resources from the Housing Trust Fund (HTF) into a single housing program called the State Housing Fund (SHF). State Housing Trust Funds (HTF): The HTF was established in 1988 by the AZ State Legislature to provide a flexible funding source to assist in meeting the housing needs of low-income families in Arizona. (A.R.S. 41-3955 and A.R.S. 44-313). Federal HOME Funds (HOME): The HOME Investment Partnership Program (HOME) was created by the National Affordable Housing Act of 1990 (NAHA).

Local and Private:

- Federal Home Loan Bank Affordable Housing Program – approximately \$100,000 per year. AHP supports the creation and preservation of housing for lower income families and individuals and are awarded to members who submit applications on behalf of project sponsors who are

planning to purchase, rehabilitate, or construct affordable homes or apartments. Funds are awarded through a competitive process.

- Flagstaff General Funds – approximately \$20,000 per year
- City General Funds support housing for people experiencing homelessness.
- Foundations and Other Private Grantmakers – approximately \$50,000 per year. Local agencies raise or secure funds to support services for low-income people and people with special needs.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City owns several parcels that may be suitable for future affordable housing or public facility development. The use of City-owned land is determined by the City Council as opportunities arise.

Discussion

The Community Development Block Grant program is provided through the US Department of Housing and Urban Development (HUD) Office of Community Planning and Development. Due to its size and composition, the City of Flagstaff is classified as an 'entitlement community'. This means that Flagstaff does not apply for the CDBG program, but is awarded CDBG funds at a level based on a HUD formula involving population and demographics. In order to receive CDBG funds, the City must complete a Consolidated Plan every five years and an Annual Action Plan, based on the Consolidated Plan that details the uses of funds. Congress' primary objective for CDBG is to improve communities, principally for low and moderate income persons by:

1. Providing Decent Housing,
2. Providing a Suitable Living Environment, and
3. Expanding Economic Opportunities.

The amount of CDBG funding received by the City varies from year-to-year based on the Federal Budget. The City expects to receive between \$510,000 and \$650,000 year during each of the next five years. The Annual Action Plan describes City allocations for the CDBG program during the coming year. These allocations fund activities to address goals for the primary Consolidated Plan areas: Affordable Housing, Homelessness, Community Development, Special Needs and Citizen Participation.

Additional federal funds to address goals are made available for public housing and programs addressing the needs of people experiencing homelessness. State government, local general funds and private resources are sometimes secured by the City or by local agencies for a variety of uses.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CITY OF FLAGSTAFF	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Flagstaff has well-developed and experienced institutional infrastructure for the delivery of housing and community development programs. The Housing Section works closely with nonprofit organizations to ensure that CDBG funds reach the neediest Flagstaff residents and neighborhoods. Organizations must annually apply for CDBG funds for eligible activities. The City also works closely with and is a member of the Coconino County Continuum of Care. The City does not feel there are any gaps in the institutional delivery system at this time.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		

Street Outreach Services			
Mobile Clinics		X	
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 50 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Continuum of Care is managed by the Arizona Department of Housing and is charged with overseeing implementation strategies regarding housing and services that will lead to an overall reduction in homelessness. The Coconino County Continuum of Care meets quarterly to review progress and implementation strategies; it convenes nonprofit organizations, business, faith and community groups to problem solve housing, treatment or shelter needs. Agencies address housing concurrently with substance abuse, mental health or health care needs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The delivery system offers a wide-range of services for special needs populations and people experiencing homelessness. The Continuum of Care and special needs services are not directly managed by the City, yet the City is actively engaged with organizations providing services, including the funding of these services to the extent that CDGB funds may be used for public services. A complete list of resources and services is maintained by Northland Family Help Center and distributed by the City as needed.

Street outreach services are limited in Flagstaff, including mobile clinics and Law Enforcement outreach. Public transportation is widely available and many health care services are available within walking distance of shelters. Respondents to the City's Consolidated Plan survey identified several gaps in the service delivery system for people experiencing homelessness including: inability to keep up with the growing demand for services; difficulty obtaining the documentation necessary to provide services; short-term services for transient populations; lack of a one-stop center to address all issues; absence of a well-established process for transitioning to permanent housing due to lack of permanent affordable housing; service follow-up; lack of cross-agency cooperation and understanding of services; and absence of a well-established coordinated assessment and rapid re-housing process.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City will continue its membership in the Continuum of Care to ensure that priority needs of special populations and people experiencing homelessness are addressed. The Coconino County Continuum of Care will continue to work with the Arizona Department of Housing to address shelter and service-delivery gaps.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Neighborhood Facility and Infrastructure Improvements	2021	2025	Non-Housing Community Development	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Revitalization, Public Facilities & Infrastructure		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
2	Public Facilities	2021	2025	Non-Homeless Special Needs Non-Housing Community Development	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Revitalization, Public Facilities & Infrastructure Addressing Homelessness		Public Facility or Infrastructure Activities Low/Moderate Income Housing Benefit: 100 Persons Assisted
3	Acquisition for Affordable Housing Development	2021	2025	Affordable Housing	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Revitalization, Public Facilities & Infrastructure Decent Affordable Housing		Rental units constructed or Homeowner Housing added: 3 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Services to Meet Basic Needs	2021	2025	Non-Housing Community Development	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Public Services and Economic Opportunities		Public service activities other than Low/Moderate Income Housing Benefit: 300 People Assisted
6	Workforce Development	2021	2025	Non-Housing Community Development	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Public Services and Economic Opportunities		Public service activities other than Low/Moderate Income Housing Benefit: 15 Persons Assisted
7	Housing Stabilization Services	2021	2025	Non-Housing Community Development	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Public Services and Economic Opportunities		Public service activities other than Low/Moderate Income Housing Benefit: 50 Households
8	Service and Facility Operating Support	2021	2025	Homeless	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Addressing Homelessness		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1500 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Increase Shelter Beds/ Units	2021	2025	Homeless	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Addressing Homelessness		Housing for Homeless added: 18 beds or Household Housing Unit
11	Housing Rehabilitation	2021	2025	Affordable Housing	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Decent Affordable Housing		Homeowner Housing Rehabilitated: 20 Household Housing Unit
12	Housing Development	2021	2025		Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Decent Affordable Housing		Rental units constructed: 3 Household Housing Unit
13	Owner Assistance	2021	2025	Affordable Housing	Sunnyside La Plaza Vieja Southside Pine Knoll Citywide	Decent Affordable Housing		Homeowner Assistance Provided 50 Household Housing Unit

Goal Descriptions

1	Goal Name	Neighborhood Facilities and Infrastructure Improvements
	Goal Description	Neighborhood Facility and Infrastructure Improvements - <i>Includes Parks/ Playgrounds/ Streets/ Water Sewer Lines/ Energy Efficiency/ Broadband Infrastructure/ Etc.</i>
2	Goal Name	Public Facilities
	Goal Description	Public Facilities - <i>Includes Acquisition/ Construction/ Reconstruction/ Rehab/ Installation/ Improvements/ Etc.</i>
3	Goal Name	Affordable Housing Development
	Goal Description	Acquisition for Affordable Housing Development - <i>Land/ Real Property/ Etc.</i> Development of infrastructure in support of affordable housing development.

4	Goal Name	Services to meet basic needs
	Goal Description	Services to Meet Basic Needs - <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>
6	Goal Name	Workforce Development
	Goal Description	Workforce Development - <i>Includes Childcare/ Senior Services/ Services for Disabled Individuals/ Mental Health/ Etc.</i>
7	Goal Name	Housing Stabilization Services
	Goal Description	Housing Stabilization - <i>Includes Rental Assistance/ Eviction and Foreclosure Prevention/ Legal Services/ Housing Counseling/ Etc.</i>
8	Goal Name	Service and Facility Operating Support
	Goal Description	Service and Facility Operating Support - <i>Includes Outreach/ Shelter Managers / Case Managers/ Coordinated Entry/ Etc.</i>
9	Goal Name	Increase Shelter Beds/ Units
	Goal Description	Increase Shelter Beds/Units - <i>Includes Emergency / Transitional Shelter/ Permanent Supportive Housing/ Etc.</i>
11	Goal Name	Housing Rehabilitation
	Goal Description	Rehabilitation of housing units owned by low and moderate income households
13	Goal Name	Housing Development
	Goal Description	Construction of housing units for purchase or rental by low and moderate income households.
14	Goal Name	Housing Assistance
	Goal Description	Assistance for low and moderate income households to purchase an affordable home.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City estimates it will provide affordable housing to 15 extremely low-income families, 40 low-income families and 30 moderate income families. The City does not directly receive HOME funding.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The City of Flagstaff Housing Authority is not required to increase the number of accessible units through a 504 voluntary compliance agreement.

Activities to Increase Resident Involvements

The Housing Authority has multiple goals and objectives created to increase resident involvement including: ongoing surveys and formal annual resident input and participation to ensure the public housing environment is appealing and up-to-date; providing maintenance and repair training prior to occupancy; using the Siler Homes Activity Center as a base for various resident services including resource referral and goal setting for residents seeking economic self-sufficiency; establishing community partnerships to provide programming relevant to residents; continuing resident orientation; partnering with the Boys and Girls club to provide free on-site programs; and resident meetings, barbeques and newsletters to help residents with education, employment, job training and youth services.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Affordable housing barriers are regulatory or financial systems that make it harder for developers to create affordable housing. Barriers to affordable housing development can occur at many levels – local, state and federal government, as well as in related industries, such as the real estate, insurance and finance industries.

HUD defines a regulatory barrier as "a public regulatory requirement, payment, or process that significantly impedes the development or availability of affordable housing without providing a commensurate health and/or safety benefit." To identify potential local public barriers to affordable housing development, the City completed HUD's Regulatory Barriers checklist. Based on the checklist, the City identified three potential local public barriers to affordable housing development:

1. Has not adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings.
2. Has not instituted a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental and related permits.
3. Does not provide for expedited or "fast track" permitting and approvals for all affordable housing projects in the community.

The first barrier is the only barrier that could negatively impact the development of affordable housing in Flagstaff. The present permit application process does not require the developer to obtain approvals from separate departments, rather when an application is submitted the various permits are handled internally. State law requires the City to permit and approve all developments within a specified time frame, negating the necessity of providing for fast track permitting and approvals for affordable housing projects.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Over the past decade, the City has taken extensive steps to both remove barriers and to promote affordable housing development, including the development of an Incentive Policy for Affordable Housing (IPAH), adopted in October 2009 and later integrated into the City zoning code. The IPAH is designed to foster the preservation and production of affordable housing units and is intended to narrow the deficit of all types of housing for households earning up to 150% of the Area Median Income (AMI). The IPAH standards may be applied to rental housing, homeownership housing, and shelter, as well as to expiring affordable housing developments. The IPAH incentivizes developments that commit to permanently affordable housing units. When a developer takes advantage of the incentives offered under the IPAH, the affordable units are legally committed to the intended population through occupancy, resale and rent restrictions. The City has no current plans to adopt specific building code language that would allow graduated housing rehabilitation.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City is not a direct recipient of Emergency Solutions Grant funds. Continuum of Care members may use CDBG funds to assist street outreach. Funded programs generally require an Individual Assessment Plan for each client enrolled in their program. There are currently three nonprofit organizations that conduct outreach services.

Addressing the emergency and transitional housing needs of homeless persons

The City of Flagstaff will continue to support agencies that provide emergency and transitional housing to the extent allowed under the CDBG program. The City will also support the creation of new emergency shelter beds and transitional housing beds for families should a fundable proposal be received; while the City and C o C members recognize Housing First and permanent supportive housing are critical to ending homelessness the large number of homeless individuals and families, the high cost of housing and a 20% employment rate among homeless individuals means that homeless individuals and families may require a longer stay in transitional housing. The City will also continue its active participation in the Coconino County Continuum of Care.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The City will continue to provide support to those agencies that help homeless people transition to permanent housing and that prevent homelessness, support the development of new rental housing opportunities including providing CDBG funds for infrastructure improvements should a fundable proposal be received, support move-in assistance programs, and continue its active participation in the Coconino County Continuum of Care.

The City of Flagstaff Housing Authority has focused on placement of homeless veterans through the VASH rental voucher program. Other agencies have a strong record of success in placing and keeping homeless individuals housed through rapid re-housing programs.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City will continue to provide support to those agencies that help low-income individuals and families avoid becoming homeless through the provision of CDBG funds for public services activities including eviction prevention, foreclosure prevention, housing and financial counseling services, and legal services to assist low-income households experiencing unlawful eviction. The City will also continue participating in discussions with the Coconino County Continuum of Care regarding the needs of people being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.

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SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City will continue to take action to educate and inform the public regarding lead hazards by distributing lead poisoning and lead hazard information to participants in federally-funded programs and to any interested resident.

How are the actions listed above related to the extent of lead poisoning and hazards?

Through education and information the City can reach many households who occupy or plan to occupy one of the 8,100 housing units built before 1980.

How are the actions listed above integrated into housing policies and procedures?

The City follows a multi-pronged approach to reduce lead hazards, integrating the following actions into housing policies and procedures:

1. Rehabilitation Projects. The City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, and requires compliance from its contractors and subcontractors. Any structure built before 1978 that is proposed for rehabilitation under federal programs, is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. The City has licensed contractors who are available to perform limited abatement and/or removal procedures if lead-based paint is present. Full abatement services are contracted with licensed contractors located outside of the City.
2. Section 8 Housing Choice Vouchers. The PHA inspects prospective dwellings constructed prior to 1978 that will have a child under the age of six residing therein, for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.
3. Public Education. Lead hazard information is distributed to participants in homeownership and rental programs.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Twenty percent of Flagstaff households or 4,379 households had income below the poverty level in 2019. The rate of poverty was highest among non-family households age 18 to 24; many of these households are NAU students with limited income generating capacity. Of non-family households headed by a person age 25 or older 18% lived below the poverty level. Single-parent female-headed households experienced the highest rate of poverty among family households at 24%. Of single-parent male-headed households 15% lived below the poverty level. Among married-couple family households 6% lived below the poverty level.

The City will reduce the number of poverty level households by providing CDBG public services resources to local agencies that provide social supports, eviction and foreclosure prevention, and services that support employment and job training. The City will also continue to rehabilitate housing units owner-occupied by households living at or below the poverty level to support these households in retaining quality, safe housing. Local agencies rely heavily on State funding and programs to address the needs of poverty-level households and reduced State funding of many of these programs has a significant negative impact on individuals and families and the ability of the City to leverage resources. The State has reduced funding for economic development programs, eliminating incentives and assistance to retain, expand and locate international and other qualified business projects. Budget reductions in the State Housing Trust Fund will have the greatest impact on the City of Flagstaff Consolidated Plan.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The US Census calculates poverty using income from earnings and other sources for adult household members, but not public assistance such as housing subsidy or food stamps. For this reason and others it is important to note that while poverty may measure what a family needs, it is used primarily as a statistical yardstick. Many poverty level households consist of people with special needs who live on fixed incomes. Poverty level households would benefit from affordable rental housing and permanent supportive rental housing. Those who are owner occupants would benefit from assistance with housing rehabilitation, including disability accessibility improvements.

Households living below the poverty level will be made aware of the various local services available that provide an economic safety net and opportunities for increased earnings. Due to the reduced State Housing Trust Fund, there has been the loss of matching and leverage funds for affordable housing programs and projects and fewer households can be assisted. Fewer resources are available for the eviction and foreclosure prevention programs that are a significant safety net for poverty-level households experiencing a crisis. And the State policy to not provide HOME funds for owner-occupied housing rehabilitation activities in entitlement jurisdictions will limit the ability of the City to provide needed improvements to homes owned by poverty-level households, many of whom have special needs.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The purpose of monitoring is to ensure all projects remain compliant with the regulations set forth by HUD, including timely expenditure of funds. The City of Flagstaff accomplishes the majority of its goals through collaboration with community organizations identified by a public Request for Proposals process. These collaborations are monitored for progress through monthly/ quarterly reports, receipt of payment requests that are compared to monthly/ quarterly reports for consistency, and ongoing communication. Regular communication ensures that sub-recipients facing challenges are provided the necessary support. If payment requests are not received regularly, the City contacts sub-recipients to encourage payment request submittal and therefore timely expenditure of funds. Along with monthly/quarterly reports, payment requests are examined to quantify progress.

Each sub-recipient also receives on-site monitoring to identify areas for improvement, assist in overcoming challenges impeding accomplishments, and ensure compliance with regulations and policies. The City monitors each subrecipient to ensure that minority and women owned business enterprise marketing and procurement policies are followed. Agencies that received a positive monitoring in the past for the same contract may be offered the option of an in-depth desk monitoring performed by the Housing and Grants Administrator.

Timely expenditure of funds is also ensured through the Request for Proposals process. This process places value on the sub-recipients ability to execute the program and utilize the CDBG funds in an efficient and expedient manner.

The City of Flagstaff addresses Consolidated Plan goals and objectives through internally-performed activities and programs. These activities and programs are managed by the Housing Section and are tracked for performance and compliance through institutional processes including accounting, performance and time tracking, grant management, and legal review. Measured accomplishments are provided through the Integrated Disbursement and Information System (IDIS), in the Consolidated Annual Performance Evaluation Report, and in regular updates on Housing Section accomplishments provided to the City Council in public and televised meetings.



ANNUAL ACTION PLAN

Program Year 2021

July 1, 2021 – June 30, 2022

Mayor

Mayor Paul Deasy

Council

Vice-Mayor Becky Daggett

Councilmember Adam Shimoni

Councilmember Regina Salas

Councilmember Austin Aslan

Councilmember Miranda Sweet

Councilmember Jim McCarthy

City Manager

Greg Clifton

Community Development Director

Dan Folke

Housing Director

Sarah Darr

Year 1 of the 2021-2025 Consolidated Plan

ON REQUEST THIS DOCUMENT CAN BE MADE AVAILABLE IN ALTERNATE FORMATS

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Flagstaff Annual Action Plan describes allocations for the Community Development Block Grant program for the coming year – Program Year 2021, the first year of the 2021-2025 Consolidated Plan. These allocations fund activities to address goals from the primary Consolidated Plan areas: Affordable Housing, Homelessness, Community Development, Neighborhood Revitalization, Economic Opportunities, Public Services, Fair Housing and Citizen Participation.

The amount of CDBG funding received by the City of Flagstaff varies from year-to-year is based on the federal budget. The City expects to receive between \$510,000 and \$615,000 each year during the next five years. The 2021 Program Year CDBG Entitlement for the City of Flagstaff is \$571,367. In addition, the City is utilizing \$278,216 in CDBG Program Income and \$34,190.17 in de-obligated past years funds in combination with the 2021 Entitlement for a total of \$883,773.17 available to allocate.

Additional federal funds to address goals were made available for public housing and programs addressing the needs of people experiencing homelessness. State government, local general funds and private resources are occasionally secured by the City or by local agencies for a variety of uses.

As of the date of submission of the Program Year 2021 Annual Action Plan, a portion of CDBG funds from previous program years is currently unspent. However, these funds have been allocated to projects in the corresponding Annual Action Plans and will not be reallocated to different activities. Previous years' funds are not accounted for in this Annual Action Plan.

In Program Years 2019 and 2020 the City of Flagstaff received CDBG-CV funds provided by the CARES (Coronavirus, Aid, Relief and Economic Security) Act. These funds were allocated in the 2019 Annual Action Plan completing two substantial amendments. A portion of the CDBG-CV funds remain unspent yet allocated to projects that prevent, respond to and/or prepare for Coronavirus. These funds will not be reallocated to different activities and are not accounted for in the PY 2021 Annual Action Plan.

Anticipated Resources

Program	CDBG	Source of Funds	Public-federal
Uses of Funds: Affordable Housing, Public Services, Acquisition, Administration & Planning			
Narrative Description: The City of Flagstaff's 2021 Program Year CDBG allocation total is \$571,367. This allocation will be combined with \$278,216 in Program Income and \$34,190.17 in de-obligated past years funds for a total amount available of \$883,773.17.			
Expected Amount Available Year 1			
Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$
\$571,367	\$278,216	\$39,190.17	\$883,773.17
			Expected Amount Available Remainder of ConPlan: \$
			\$2,285,468

Table 51 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will leverage possible additional resources to rehabilitate and/or develop affordable housing for renters or owners, to provide services to vulnerable populations including people experiencing homelessness, people living in poverty, and other people with special needs. When funding has matching requirements, match may be satisfied through local fundraising by nonprofit organizations, State Housing Trust Funds, and City General Funds. \$457,551 federal, state, and local funds will leverage 2021 CDBG projects.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Flagstaff utilizes CDBG funds to improve public facilities and infrastructure in low- and moderate-income neighborhoods, specifically the Sunnyside, Pine Knoll, La Plaza Vieja and Southside target neighborhoods. The City relies on the Council adopted and voter ratified Flagstaff Regional Plan 2030 as well as Neighborhood Specific Plans for La Plaza Vieja and Southside to guide area needs and project allocations for public facilities and infrastructure such as sidewalk improvements, recreation improvements and more. These Neighborhood Specific Plans were developed in partnership with the corresponding neighborhood associations and extensive public involvement.

Discussion

The City of Flagstaff continues to receive periodic Program Income from previous homebuyer assistance and owner occupied housing rehabilitation programs. In PYs 2019 and 2020 the City received an unprecedented amount of Program Income due to the favorable housing market and interest rates in the City of Flagstaff. Those funds will be allocated in this Annual Action Plan. Should the City receive additional Program Income in excess of an amount that could make it difficult for the City to remain timely, a mid-year allocation and amendment to the Annual Action Plan will be considered.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Activity Matrix Code:	Goal Outcome Indicator
1	Housing Rehabilitation	2021	2022	Affordable Housing	Citywide	Affordable Housing	CDBG \$303,665.83	14A	Homeowner Housing Rehabilitated: 8 Household/Housing units
2	Increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds/Units	2021	2022	Homeless	Citywide	Homelessness	CDBG \$345,769.84	14G	Overnight/ Emergency Shelter/ Transitional Housing Beds/Units added: 8 Units
3	Services to Meet Basic Needs	2021	2022	Non-Housing Community Development	Citywide Sunnyside Pine Knoll	Public Services & Economic Opportunities	CDBG \$25,000	03T 05A-05T 05Z	Public service activities other than Low-/Moderate-Income Housing Benefit: 50 Persons
4	Workforce Development	2021	2022	Non-Housing Community Development	Citywide	Public Services & Economic Opportunities	CDBG \$54,337.50	05H 05Z	Individuals/Businesses assisted: 12 Persons
5	Service and Facility Operating Support, including Outreach Services to Meet Basic Needs	2021	2022	Homeless Non-Homeless Special Needs	Citywide	Homelessness Public Services & Economic Opportunities	CDBG \$30,000	05D 05N 03T 05H	Public service activities other than Low-/Moderate-Income Housing Benefit: 70 Persons

6	Planning & Administration	2021	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Homelessness Affordable Housing Public Services & Economic Opportunities Revitalization, Public Facilities & Infrastructure	CDBG \$125,000.00	2021A 2021B 2021C 2021D 2021E	Other: 1
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Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	<p>Housing Rehabilitation aims to preserve existing affordable housing stock and benefit low- and moderate-income households in the City of Flagstaff. Housing Rehabilitation may include: 1) elimination of health and safety hazards in the housing stock; 2) improvements in accessibility and aging in place; 3) financial stabilization of low- and moderate-income households through energy efficiency repairs and utility costs; 4) increased building performance through weatherization and performance upgrades; 5) preservation and revitalization of low income neighborhoods; 6) preservation of the entry level housing stock.</p> <p>Projects include rehabilitation of privately owned, single-unit homes and all delivery costs (including materials and labor) and service costs) directly related to carrying out housing rehabilitation activities.</p> <p>Funds will be used to provide grants and/or no interest, deferred payment loans to low-income households to cover the cost of systems (heating, hot water, roofing, electrical) to ensure homes are safe and provide a decent and safe living environment.</p>
2	Goal Name	Increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds
	Goal Description	<p>Funds will be used to increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds for the City of Flagstaff's homeless individuals/households.</p> <p>Projects include acquisition, construction, conversion of buildings, or rehabilitation of temporary shelter for the homeless, including victims of domestic violence, dating violence, sexual assault or stalking, disabilities, mental health issues, drug offenders, and parolees.</p>

3	Goal Name	Services to Meet Basic Needs
	Goal Description	Public service projects may include Pandemic Response, Homeless/AIDS Patients Programs, Senior Services, Disabilities, Legal Services, Youth Services, Transportation Services, Substance Abuse Services, Services, Employment Training, Crime Awareness/Prevention, Fair Housing Activities, Tenant/Landlord Counseling Services, Mental Health Services, Screen for Lead Poisoning, Subsistence Payments, Food Banks, Etc.
4	Goal Name	Workforce Development
	Goal Description	Assistance for programs providing workforce development including employment/job training and business services carried out as a public service. Activities include skill development programs, vocational programs, apprenticeship programs, paid internship assistance for businesses and/or business counseling for individuals.

5	Goal Name	Service and Facility Operating Support, including Outreach
	Goal Description	CDBG funds will be used for costs associated with the operation of programs for the homeless or for utilities, maintenance, and insurance.
6	Goal Name	Planning and Administration
	Goal Description	CDBG funds will be used for expenses related to administering the program, preparing planning documents, activities, and other eligible expenses.

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Projects

AP-35 Projects – 91.220(d)

Introduction

The strategies listed in this plan address the first-year allocation of the 2021-2025 Consolidated Plan for the City of Flagstaff in Program Year 2021. The City will be allocating funds to local agencies/ subrecipients to carry out projects and manage funds with City of Flagstaff oversight. Projects align with the priority needs of the community: Revitalization, Public Facilities and Infrastructure, Public Services & Economic Opportunities, Addressing Homelessness, Develop and Preserve existing Affordable Housing.

In the 2021 CDBG process, eight external agency proposals were received. When program income and de-obligated funding is included, the 2021 CDBG allocation is \$883,773.17. Eight proposals requesting a total of \$1,072,773.17 in CDBG funding were received by the February 22, 2021 deadline. One applicant withdrew their application leaving \$897,773.17 in total requests. Recommendations were discussed at a public hearing and City Council Work Session on April 13th, 2021. Resolutions approving the allocations and submission of the Annual Action Plan were approved by the City Council at a public hearing and City Council Meeting on April 20th, 2021. The following table identifies approved projects for 2021-2022 Program Year with a budget of \$883,773.17.

Projects

#	Project Name
1	Housing Rehabilitation
2	Increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds/Units
3	Services to Meet Basic Needs
4	Workforce Development
5	Service & Facility Operating Support
6	Planning and Administration

Table 53 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

For Program Year 2021, the City issued a request for proposals for CDBG eligible activities. Proposals are evaluated based on CDBG eligibility and funding criteria (for example: benefit of ratio of dollars per person, percent of leverage funding, past successful CDBG contract administration, location of the project in a target area, and evidence of community collaborations. At least 70% of CDBG funds must serve low and moderate-income people and not more than 15% may be used for public services. Up to 20% may be used to cover administrative costs, including indirect costs. The largest obstacle to addressing underserved needs is insufficient funding, particularly for public services projects. This City of Flagstaff evaluates past and present projects for efficient and effective use of funds in addressing the high priority needs identified in the Consolidated Plan as well as for the impact on low- and moderate-income City residents.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehabilitation
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing Neighborhood Revitalization, Public Facilities & Infrastructure
	Funding	CDBG \$303,665.83
	Description	Housing Rehabilitation aims to preserve existing affordable housing stock and benefit low- and moderate-income homeowners in the City of Flagstaff. Housing Rehabilitation may include: 1) elimination of health and safety hazards in the home; 2) facilitation of ADA accessibility and aging in place; 3) financial stabilization of low- and moderate-income households through the reduction of home repair and utility costs; 4) increased building performance through weatherization and performance enhancing measures; 5) revitalization of low income neighborhoods; 6) preservation of the entry level housing stock.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	A total of 8 Low-and Moderate-income Homeowners will be assisted.
	Location Description	NA
	Planned Activities Activity Matrix: 14A, 14H 24 CFR 570.202(a)(1), 24 CFR 570.202(b)(9 or 42 USC 5305(a)(4)	Rehabilitation of privately owned, single-unit homes and all delivery costs (including staff, other direct costs, and service costs) directly related to carrying out housing rehabilitation activities. Funds will be used to provide grants and/or no interest, deferred payment loans to low-income households for repair of critical home systems (e.g., heating, hot water, roofing, electrical) to ensure homes are safe and provide a decent and suitable living environment.
2	Project Name	Increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds/Units
	Target Area	Citywide

	Goals Supported	Increase Overnight Emergency Shelter, Transitional and Supportive Housing Beds
	Needs Addressed	Homelessness Public Services & Economic Opportunities
	Funding	CDBG: \$345,769.84
	Description	Acquire 8 supportive housing beds for chronically homeless individuals.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Supportive housing will be provided for 8 chronically homeless individuals.
	Location Description	2480 E Linda Vista Dr, Flagstaff, AZ 86004
	Planned Activities Activity Matrix: 01, 14G 24 CFR 570.201(e) or 42 USC 5305(a)(1), 24 CFR 570.202(b)(1) or 42 USC 5305(a)(1)	Funds will be used to purchase a facility (residential home – 1556 sq ft, 3-bedroom, 1.75-bathroom house) in East Flagstaff to serve as a permanent location.
	3	
	Project Name	Services to Meet Basic Needs
	Target Area	Citywide Sunnyside Pine Knoll
	Goals Supported	Services to Meet Basic Needs
	Needs Addressed	Public Services & Economic Opportunities
	Funding	CDBG: \$25,000
	Description	Fund afterschool and school break childcare scholarships for low-and moderate-income households.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 low- and moderate-income households with children, living in public housing or eligible for SNAP and/or free and reduced lunch will receive quality afterschool and school-break childcare.

	Location Description	Citywide Sites in Sunnyside and Pine Knoll.
	Planned Activities Activity Matrix: 05L 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2)	Childcare services Financial Aid and Scholarships for Low- and moderate-income households.
4	Project Name	Workforce Development
	Target Area	Citywide
	Goals Supported	Workforce Development
	Needs Addressed	Public Services & Economic Opportunities
	Funding	CDBG: \$54,337.50
	Description	Provide free business coaching, technical assistance and mentorship to eligible project participants interested in developing skills in retail sales or to start/operate their own small business microenterprise.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	12 low- and moderate- income business owners assisted.
	Location Description	Citywide
5	Planned Activities Activity Matrix: 05H, 05Z 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2), 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2)	Funds will be used for public service operational costs, including salaries and covering licensing and business start up fees for eligible participants.
	Project Name	Service & Facility Operating Support
	Target Area	Citywide
	Goals Supported	Service & Facility Operating Support

	Needs Addressed	Homelessness Public Services & Economic Opportunities
	Funding	CDBG: \$30,000
	Description	Provide youth experiencing homelessness with basic needs and resources.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	70 homeless youth served with basic needs and resources.
	Location Description	Citywide
	Planned Activities Activity Matrix: 03T, 05D, 05H, 05N 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2), 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2), 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2), 24 CFR 570.201(e) or 42 USC 5305(a)(8) + 24 CFR 570.482(c)(2)	Funds will be used for public service operational costs including salary for a FTE Youth Coach who will work to identify needs related to academics, health, housing, hygiene, employment, and independent living skills as well as develop “host homes” for homeless youth.
6	Project Name	Planning and Administration
	Target Area	Citywide
	Goals Supported	All
	Needs Addressed	Homelessness Affordable Housing Public Services & Economic Opportunities Revitalization, Public Facilities & Infrastructure

Funding	CDBG: \$125,000
Description	Expenses related to administering the program, preparing planning documents and reports, fair housing activities, and other eligible expenses under this category.
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	Planning and administration of HUD programs provides a benefit to all residents.
Location Description	Citywide
Planned Activities Activity Matrix: 20, 21A, 21D, 21H 24 CFR 570.206 or 24 CFR 570.489(a)(3) + 24 CFR 570.206 or 24 CFR 570.205 + 24 CFR 570.206(i)(2) or 42 USC 5305(a)(13)	Expenses related to administering the program, preparing planning documents and reports, fair housing activities, and other eligible expenses under this category including City of Flagstaff Indirect.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City has designated four target areas. These target areas encompass many of the areas of low-income and minority concentration and include:

- Sunnyside - Census Tract 3, Block Group 2, 3, & 4.
- Southside - Census Tract 8, Block Group 1.
- Pine Knoll - Census Tract 8, Block Group 2.
- La Plaza Vieja - Census Tract 11.02, Block Group 3

All projects in the 2021 Annual Action Plan will occur citywide.

Geographic Distribution

Target Area	Percentage of Funds
Sunnyside	3%
La Plaza Vieja	0
Southside	0
Pine Knoll	3%
Citywide	100

Table 54 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Proposals are evaluated based on CDBG eligibility and funding criteria (for example: benefit of ratio of dollars per person, percent of leverage funding, past successful CDBG contract administration, location of the project in a target area, and evidence of community collaborations).

The City's four target areas encompass many of the areas of low-income and minority concentration and have been identified as high priority need in all categories.

Discussion

The City strives to utilize CDBG funds in target areas; however, the actual distribution of funds to target areas depends on the number and type of proposals that are received. In the 2021 Program Year, 100% of funds will be expended Citywide and 3% will be utilized for public services in Sunnyside and Pine Knoll.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Annual Action Plan requirement is to provide information on the number of households that will benefit from affordable housing and the types of housing these households will be supported through. The following HUD tables define the City's goals for the number of households that will be provided housing by housing activity.

One Year Goals for the Number of Households to be Supported	
Homeless	8
Non-Homeless	8
Special-Needs	0
Total	16

Table 55 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	8
Acquisition of Existing Units	8
Total	16

Table 56 - One Year Goals for Affordable Housing by Support Type

Discussion

Over the coming year a total of 16 households will benefit from PY 2021 CDBG funded projects included in the Annual Action Plan. Rehab of 8 existing units will preserve affordable housing stock and provide critical health, safety and accessibility renovations for LMI households. Public facility acquisition will provide 8 permanent supportive house units for chronically homeless individuals.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 Housing Choice Vouchers, 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability.

The public housing units are in good repair as the Housing Authority follows a system of ensuring that all major systems are well maintained. The Housing Authority develops a 5-year Plan, updated and submitted to HUD on an annual basis, to identify the capital needs of public housing developments and the methods by which living conditions will be improved for public housing residents.

Actions planned during the next year to address the needs to public housing

In March 2021, the City of Flagstaff released a Request for Statement of Qualifications from firms experienced in the repositioning of Public Housing through the Rental Assistance Demonstration (RAD) program, to partner on the repositioning of its Public Housing through RAD or other repositioning options allowed by U.S. Department of Housing and Urban Development (HUD).

The City owns and manages 265 public housing units, of which 100 units are located in Siler Homes and 127 units are located in Brannen Homes. The remaining 38 units are scattered throughout the City. All properties are a part of HUD's Public Housing program and are currently subject to restrictions set forth in Declarations of Trust. Certain other properties owned by the City may be included in the repositioning and redevelopment process.

The City intends to reposition and redevelop its public housing in order to increase the inventory of public and private affordable housing for renters and, potentially, homeowners throughout the City. The City's vision is to create vibrant, attractive, and diverse mixed-income communities that include a mix of rental units to house families, as well as units specifically designed for the elderly and other groups with special needs. The City's goals are to reposition its public housing portfolio, through RAD and other options allowed by HUD in order to stabilize funding, modernize properties, and increase the number of affordable housing units.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority has multiple goals and objectives created to increase resident involvement including: ongoing surveys and formal annual resident input and participation to ensure the public housing environment is appealing and up-to-date; providing maintenance and repair training prior to occupancy; continuing resident education; partnering with the Boys and Girls club and the City Recreation Department to provide free on-site programs; and resident meetings, barbeques and newsletters to help residents with education, employment, job training and youth services.

The City Housing Authority produces a monthly newsletter for public housing residents. Newsletter content includes food and utility assistance, library programming, free tax assistance information, healthcare marketplace information, regular deadlines for rent and recertification submission, public notice regarding policy changes, and countless other resources.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Flagstaff's Housing Authority is a high performing PHA.

Discussion

The City of Flagstaff Housing Authority provides 265 public housing units, 12 mod-rehab units, 333 Housing Choice Vouchers, 106 Veterans Affairs Supportive Housing Vouchers, 2 Foster Youth Initiative vouchers (with remaining capacity of 23) for homeless youth exiting foster care and 40 Mainstream Vouchers for non-elderly households that contain an adult with a disability.

The Housing Authority develops a 5-year Plan to identify the capital needs of public housing developments and the methods by which living conditions will be improved for public housing residents.

The City of Flagstaff Housing Authority is seeking a development partner through a Request for Statement of Qualifications from firms experienced in the repositioning of Public Housing through the Rental Assistance Demonstration (RAD) program, to partner on the repositioning of its Public Housing through RAD or other repositioning options allowed by HUD.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City is not a direct recipient of Emergency Solutions Grant funds from HUD yet invests a significant amount of financial and staff resources in addressing the needs of people experiencing homelessness and people with special needs in the City of Flagstaff. This section describes the City's one-year goals and actions for reducing and ending homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Continuum of Care (C of C) members and participants in the Front Door coordinated entry program may apply for CDBG funds to assist street outreach, but with limited public service dollars, local agencies choose to apply for support in prevention and diversion programs. There are currently three nonprofit organizations that conduct outreach services, two of which only serve veterans. Funded programs are highly encouraged to participate in coordinated entry through the Front Door and the C of C's individual assessment plan (VI-SPDAT) if not already involved.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City and Coconino County's Continuum of Care members recognize the critical nature of Housing First and permanent supportive housing. **In the 2020 Point in Time Count 817 men, women and children were experiencing homelessness in Coconino County.** Approximately 801 people remain on income restricted complex waitlists, while 1,250 people were on the waitlist in 2018. The high cost of housing and a 20% employment rate among individuals experiencing homelessness means that these individuals and families may require a longer stay in shelter or transitional housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City will continue to support agencies that provide emergency and transitional housing to the extent allowable under the CDBG program. In the 2021 Program Year, agencies will receive funds to support supportive housing services for chronically homeless individuals as well as basic needs and educational services for homeless and unaccompanied youth. The City and C of C members recognize the critical

nature of Housing First and permanent supportive housing, yet the large number of homeless individuals and families, the high cost of housing, and a 20% employment rate among homeless individuals means that homeless individuals and families may require a longer stay in transitional housing. The City will also continue its active participation in the Coconino County Continuum of Care.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

In the 2021 Program Year operational dollars will be granted to Catholic Charities for acquisition of a facility that will provide 8 supportive housing units for chronically homeless individuals with a serious mental illness and substance abuse disorder. Additionally, Homeless Youth Connection will receive operational funds to provide services for homeless and unaccompanied youth.

Community leadership is committed to bringing a higher level of coordination of services to those experiencing homelessness in our community. The Front Door is a collaborative project serving as a “front door” to those experiencing homelessness. Front Door is a diversion program and provides a single point of entry into the shelter and housing system to streamline services, reduce shelter stay and length of time that individuals and families are homeless, increase program utilization and eliminate the need for households in crisis to “service hop.”

The City will continue to support agencies that provide emergency and transitional housing to the extent allowed under the CDBG program. The City will also continue its active participation in the Coconino County Continuum of Care.

Discussion

The City is an active participant in the local Continuum of Care and staff members participate in multiple committees and lead the annual point-in-time count (conducted for the Arizona Rural Continuum of Care.) The City will continue to implement VASH Vouchers for Veterans experiencing homelessness as well as Foster Youth Initiative Vouchers.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Affordable housing barriers are regulatory, process, or financial systems that make it harder for developers to create affordable housing. Barriers to affordable housing development can occur at many levels – local, state, and federal government, as well as related industries, such as the real estate, insurance, and finance industries.

HUD defines a regulatory barrier as "a public regulatory requirement, payment, or process that significantly impedes the development or availability of affordable housing without providing a commensurate health and/or safety benefit." To identify potential local public barriers to affordable housing development, the City completed HUD's Regulatory Barriers checklist.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Over the past decade, the City has taken extensive steps to remove barriers and promote affordable housing development, including the development of an Incentive Policy for Affordable Housing (IPAH), adopted in October 2009 and later integrated into the City zoning code. The IPAH is designed to foster the production of affordable housing units and is intended to reduce the deficit of all types of housing for households earning under 150% of the Area Median Income (AMI). The IPAH incentivizes developers that commit to permanently affordable housing units through the reimbursement of development-related fees. The Flagstaff Zoning Code also implements affordable housing incentives through various development standards like density bonuses and reductions to parking and resource protection.

A current zoning code amendment is being processed that would allow for increased regulatory incentives for developers who deliver 100% affordable projects. This amendment is being proposed separately from a revision of the IPAH and related zoning code incentives, primarily to accommodate the tight external timeline requirements of any current and upcoming Low-Income Housing Tax Credit projects in the City. City staff is currently working on a comprehensive update to the existing IPAH document. Interviews with the development community and housing practitioners will help shape new concepts and revisions, along with guidance from a working group made up of members from the City's Housing and Planning and Zoning Commissions. The intent of this update to the incentive policy is to ensure the incentives offered are not only useful and effective, but that they are flexible enough to be applied under varied market conditions.

In the last couple of years, the City has adopted several zoning code amendments that implement policies and recommendations from the High Occupancy Housing Specific Plan, which was adopted in

2018. The intent of the Plan was to identify areas of the city where high density residential projects are encouraged, and what development standards, features, and amenities are desired in those projects. Recent zoning code amendments included an exemption from a use permit requirement for projects that meet certain affordable housing requirements.

Discussion:

The IPAH incentivizes developments that commit to permanently affordable housing units. When a developer takes advantage of the incentives offered under the IPAH, the affordable units are legally committed to the intended population through occupancy, resale and rent restrictions. The 2021 update to the City's incentive policy may include additional provisions for a wider array of affordable commitments rather than exclusively permanent affordability. The update may also consider methods for determining an "in-lieu" payment option to support affordable housing efforts through the city and its partners; if a specific dollar amount is known by a developer, they may prefer budgeting for that specific dollar amount up front, rather than accept the unknown costs associated with constructing and selling/renting affordable units.

AP-85 Other Actions – 91.220(k)

Introduction:

In addition to establishing goals related to the use of CDBG funds, the City established HUD-required strategies to improve the delivery system, address lead-based paint hazards, reduce the incidence of poverty, and address barriers to affordable housing development. The City has continued to perform HUD-required program monitoring for all sub-recipients.

Actions planned to address obstacles to meeting underserved needs

The development and subsequent implementation of policy initiatives are critical to the success of the City of Flagstaff's overall housing and economic development goals. In general, policy development and implementation are designed to enhance City program effectiveness, identify gaps or underserved groups, and enhance the private sector's ability to provide market-based solutions. At present, the greatest obstacle to meeting underserved needs is insufficient funding. The City addresses this obstacle by prioritizing CDBG projects that provide leverage funding to meet the needs of a larger number of people.

Actions planned to foster and maintain affordable housing

In December 2020, Flagstaff City Council declared a Housing Emergency via Resolution 2020-66. The Resolution recognizes the need to make housing a leading priority for the City of Flagstaff as an organization and the community overall. It also calls for a number of efforts to be undertaken, among them, the development of a 10-year housing plan (underway), the creation and implementation of a public outreach campaign to educate the community about the critical role affordable housing plays in a thriving community and combating "Not in My Backyard" opposition to housing and affordable housing.

The City's growing population will require an increased emphasis on housing choices in the future. The region's housing is influenced by:

- Limited supply of land for development;
- Approximately forty percent (40%) of Flagstaff's households are by definition low- to moderate-income (City FY 2016 - 2020 HUD Consolidated Plan);
- Consistent but modest rate of population growth;
- NAU's total enrollment has grown by 16.2 percent in the last five years (Fall 2013 – Fall 2018); and
- Housing needs for the elderly, multigenerational families and downsizing will increase over the next several decades as the Baby Boom generation moves into the retirement years.

Local growing population sectors include the elderly, students, single-parent households, and nonfamily households. These community members need a variety of housing options within proximity to jobs, schools, and services. NAU students currently make up approximately thirty percent (30 %) percent of the local population, and their continued demand for student housing impacts cost and availability of housing in the region, resulting in a higher demand for multi-family housing, or housing affordable for single-incomes or multiple low incomes.

An annual survey conducted by a local non-profit, Housing Solutions of Northern Arizona (HSNA), continues to show rising rates and less availability of rental units within City limits. As of May 2019, the data shows 801 people on waiting lists at income-restricted complexes. Market rate rental averages were measured as follows:

\$808 for a room/shared living	up 9.5%
\$979 for a studio	up 7.7%
\$1,214 for a one-bedroom.....	up 4%
\$1,494 for two-bedroom	up 3.7%
\$1,819 for a three-bedroom	down 2.5%

These actual rents have been well above the HUD Fair Market Rents (FMRs) for several years. The HSNA survey states, “In order to afford an average two-bedroom apartment - without paying more than 30% of income on housing - a household must earn approximately \$4,980 monthly, \$59,760 annually, or \$28.73 hourly (assuming a 40-hr work week and 52 weeks/yr.).” The City is experiencing an immediate need to house hundreds of households at more affordable rates.

Actions planned to reduce lead-based paint hazards

Distribute lead poisoning and lead hazard information to participants in federally-funded programs and to any interested resident. The City plans to rehabilitate 6 homes during the coming year and will provide lead-based paint hazard information to an estimated 8 applicants for owner occupied housing rehabilitation assistance.

The City follows a multi-pronged approach to reduce lead hazards, integrating the following actions into housing policies and procedures:

10. Rehabilitation Projects. The City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances and requires compliance from its contractors and subcontractors. Any structure built before 1978 that is proposed for rehabilitation under federal programs, is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. The City has licensed contractors who are available to perform limited abatement and/or removal procedures if lead-based paint is present. Full abatement services are contracted with licensed contractors located outside of the City.
11. Section 8 Housing Choice Vouchers. The PHA inspects prospective dwellings constructed prior to 1978 that will have a child under the age of six residing therein, for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.
12. Public Education. Lead hazard information is distributed to participants in homeownership and rental programs.

Actions planned to reduce the number of poverty-level families

The City will reduce the number of poverty level households by providing CDBG public services resources to local agencies that provide social supports, and eviction and foreclosure prevention. The City will also fund programs to rehabilitate housing units owner-occupied by households living at or below the poverty level to support these households in retaining quality, safe housing. Households living below the poverty level will also be made aware of the various local services available that provide an economic safety net and opportunities for increased earnings.

Actions planned to develop institutional structure

The City of Flagstaff has well-developed and experienced institutional infrastructure for the delivery of housing and community development programs. The Housing Section works closely with nonprofit organizations to ensure that CDBG funds reach the neediest Flagstaff residents and neighborhoods. Organizations must annually apply for CDBG funds for eligible activities. The City also works closely with and is a member of the Coconino County Continuum of Care.

In 2019, City Council added a new chapter to the Flagstaff City Code, creating a Housing Commission. The Housing Commission consists of thirteen citizens, with twelve members appointed by the City Council and one representative from the Flagstaff Housing Authority Board of Commissioners. It serves as an advisory board to City Council; makes recommendations with respect to housing policies, needs, and programs in Flagstaff; and furnishes the Council with information through the Housing Director.

Actions planned to enhance coordination between public and private housing and social service agencies

The City has developed an extensive mailing and email list that includes over 300 people who represent organizations that serve homeless and at-risk households, mainstream service and housing agencies, community development organizations, civic leaders, etc. This list is used to regularly inform these agencies of planning efforts, funding opportunities, changes in policy and practice or any other information that agencies may find useful.

The Flagstaff Community has implemented a Coordinated Entry System for those experiencing homelessness, known as the Front Door. The Front Door Specialist conducts an assessment using The Vulnerability Index – Service Prioritization and Decision Assistance Tool (VI-SPDAT). The Front Door collaboration has united the Flagstaff community and the local Continuum of Care to fast track those in crisis to the best program to end that crisis.

On a weekly basis, a cadre of service providers meet for the Case Conferencing Team Meeting. Each case manager is representing his or her own agency that has signed the Service Provider Memorandum of Understanding (MOU). The purpose of this meeting is to have a real-time discussion of each person or family on the community waitlist and to utilize scores from the VI-SPDAT to ensure fast and appropriate

referrals to end homelessness for those on the list.

The Front Door is a cost-effective strategy; that prioritizes a community conversation about how the systems function together, where the gaps in services exist, and how to answer the need. No longer will those in crisis be forced to go from shelter to shelter to access services.

Discussion:

Affordable, accessible, and decent housing is of critical importance to a community's health and viability. The Housing Plan will consolidate existing housing documents and augment with an additional planning effort to create a 10-year plan that seeks to define the housing emergency in Flagstaff and to provide policies and strategies to reduce the emergency. The Housing Plan will help identify needs, create an existing list of affordable housing, identify the affordable housing units underway, engage partners, and compile research on best practices. Altogether, these components will help identify specific policies and educational and advocacy strategies that can be implemented within our community to substantially increase the number of affordable housing units. As the City implements Flagstaff's 2021 Housing Plan, the goal is to substantially increase the number of available and affordable housing options for all Flagstaff residents at all income levels.

DRAFT

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out:

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed.
2. The amount of proceeds from section 108 loan guarantees that funding will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.
3. The amount of surplus funds from urban renewal settlements.
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
5. The amount of income from float-funded activities

Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities.
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name Balance of State Count</p> <p>List the name of the organization or individual who originated the data set. Arizona Department of Housing</p> <p>Provide a brief summary of the data set. Inventory of Sheltered and Unsheltered Individuals</p> <p>What was the purpose for developing this data set? Meet HUD requirements for Continuum of Care / HMIS reporting</p> <p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Data is collected throughout balance of Arizona, including Coconino County of which Flagstaff is a part</p> <p>What time period (provide the year, and optionally month, or month and day) is covered by this data set? Point in Time 2020</p> <p>What is the status of the data set (complete, in progress, or planned)? Complete</p>
2	<p>Data Source Name Public Housing by Program Type</p> <p>List the name of the organization or individual who originated the data set. Flagstaff Public Housing Authority</p> <p>Provide a brief summary of the data set. Public Housing by Program Type</p> <p>What was the purpose for developing this data set? To provide accurate information</p> <p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Data covers the entire City of Flagstaff Public Housing</p> <p>What time period (provide the year, and optionally month, or month and day) is covered by this data set? As of December 2015</p>

	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
3	<p>Data Source Name</p> <p>Characteristics of Public Housing Residents 1</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Flagstaff Public Housing Authority</p>
	<p>Provide a brief summary of the data set.</p> <p>Characteristics for Public Housing Residents</p>
	<p>What was the purpose for developing this data set?</p> <p>Provide accurate information</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>City of Flagstaff</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>As of December 2020</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
	4
<p>List the name of the organization or individual who originated the data set.</p> <p>Flagstaff Housing Authority</p>	
<p>Provide a brief summary of the data set.</p> <p>Race of Public Housing Residents</p>	
<p>What was the purpose for developing this data set?</p> <p>Provide accurate information</p>	
<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>City of Flagstaff</p>	
<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>Primarily 2011-2015 or 2010 the most recent available Census</p>	
<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>	

5	Data Source Name Ethnicity of Public Housing Residents
	List the name of the organization or individual who originated the data set. Flagstaff Housing Authority
	Provide a brief summary of the data set. Ethnicity of Public Housing Residents
	What was the purpose for developing this data set? Provide accurate information
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? City of Flagstaff
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? December 2015
	What is the status of the data set (complete, in progress, or planned)? Complete
	6
List the name of the organization or individual who originated the data set. City of Flagstaff	
Provide a brief summary of the data set. List of facilities serving people experiencing homelessness by type of facility.	
What was the purpose for developing this data set? Provide information	
How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Comprehensive for the City of Flagstaff	
What time period (provide the year, and optionally month, or month and day) is covered by this data set? Point in time as of December 2020	
What is the status of the data set (complete, in progress, or planned)? Complete	

**CITY OF FLAGSTAFF
STAFF SUMMARY REPORT**

To: The Honorable Mayor and Council
From: Stacy Saltzburg, City Clerk
Date: 04/13/2021
Meeting Date: 04/13/2021



TITLE:
COVID-19 Update

DESIRED OUTCOME:

EXECUTIVE SUMMARY:

INFORMATION:

Attachments: [Presentation](#)

COVID-19 Update





Agenda



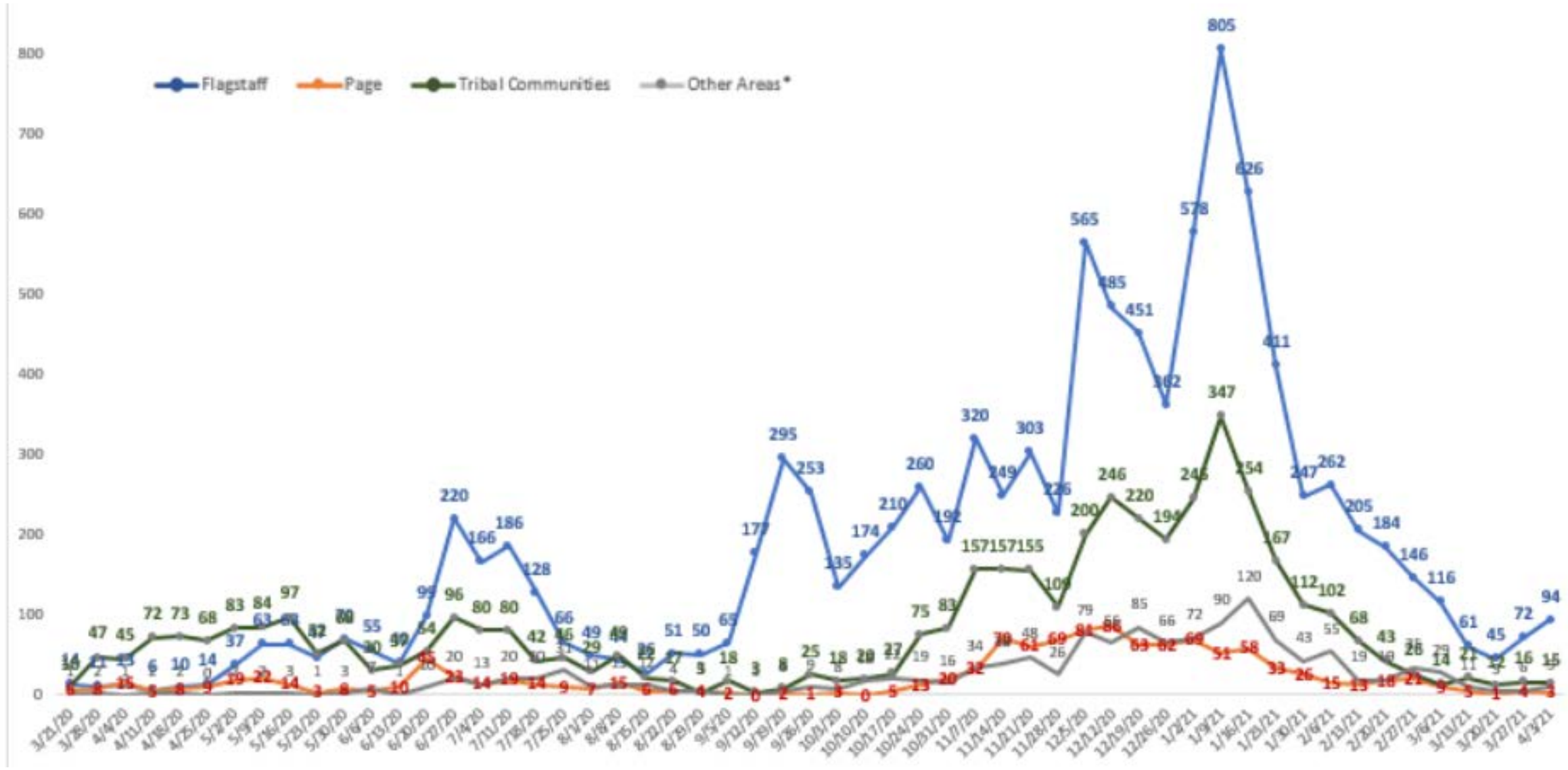
- Data Update
- Re-Entry Plan Discussion
 - Monitoring Criteria & Phases
 - Re-opening City Facilities
 - Special Event Permit
 - Options for Consideration

Data Update



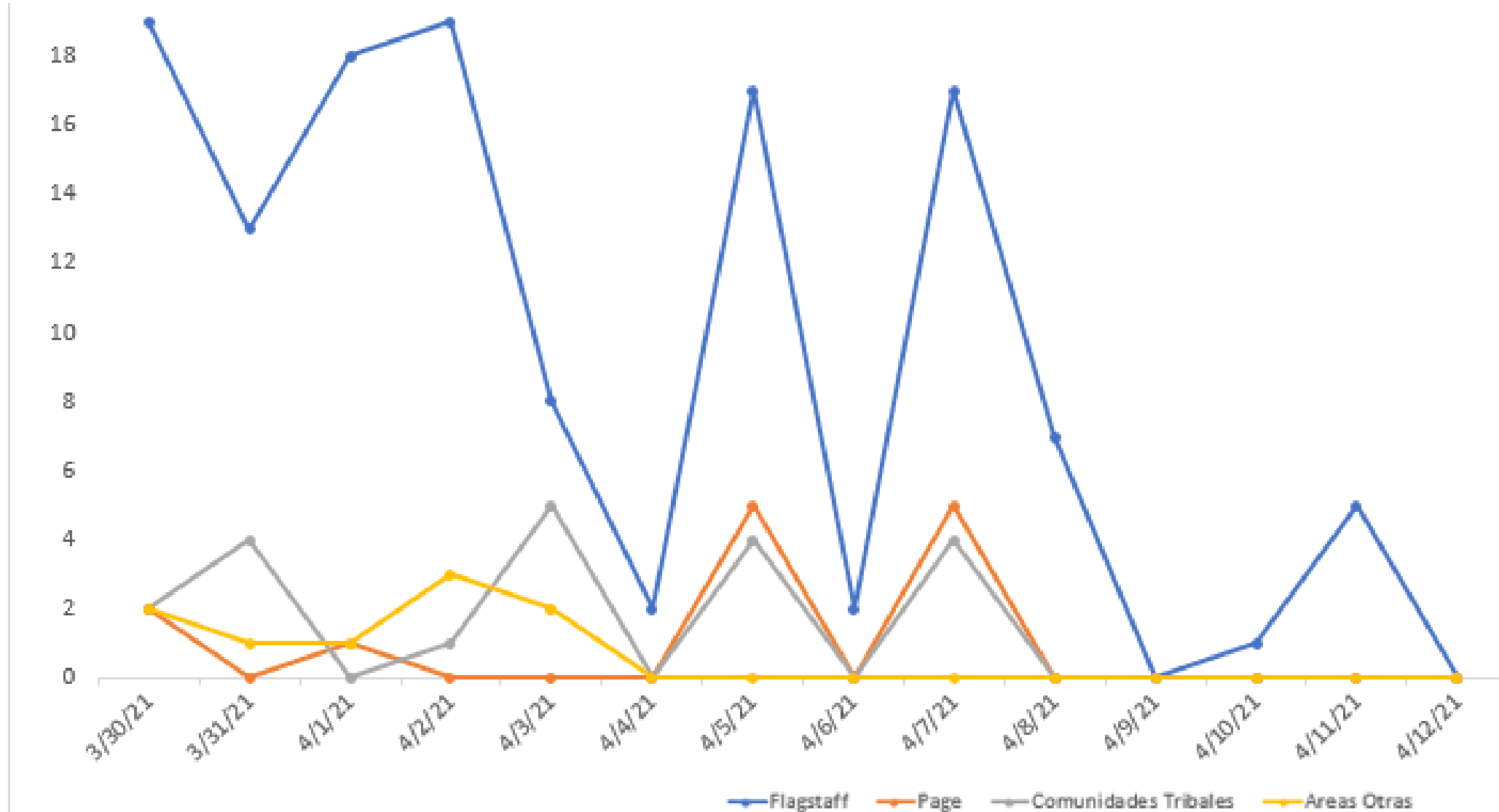


CCHHS: COVID-19 Weekly Cases





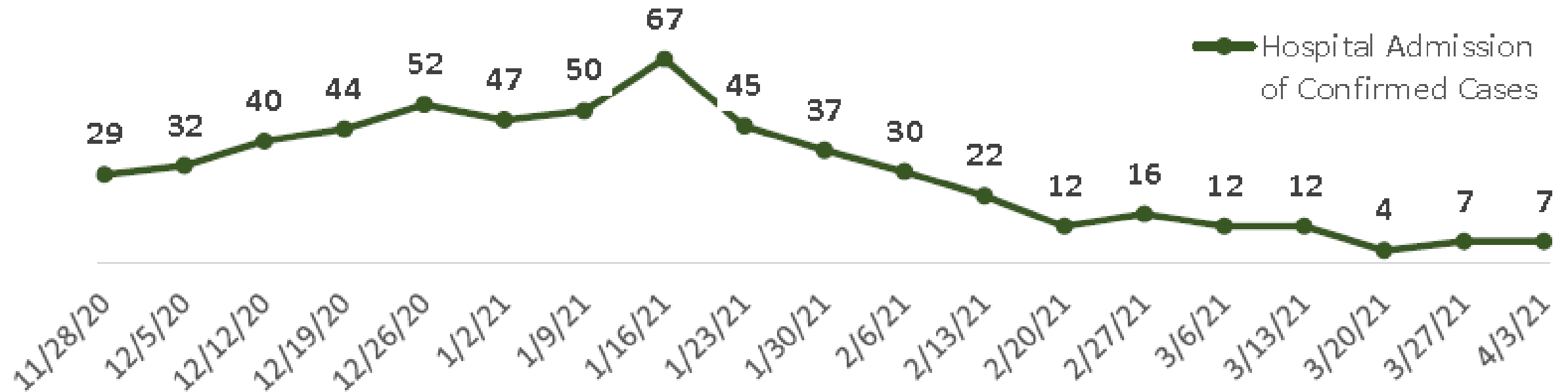
CCHHS: COVID-19 Daily Cases





CCHHS: Hospital Admissions

Weekly Case Counts Among Coconino County Residents:





CCHHS: Hospital Admissions

Hospitalizations

(not all hospitals are currently reporting hospitalization data to Coconino County):

	Banner Page Hospital	Flagstaff Medical Center	Tuba City Regional Healthcare
Adult ICU Bed Availability (N)	3	15	3
Adult ICU Bed Availability (%)	100%	37%	50%
Emergency Department Bed Availability (N)	7	1	30
Emergency Department Bed Availability (%)	78%	3%	100%
Med/Surg Bed Availability (N)	3	48	14
Med/Surg Bed Availability (%)	18%	33%	27%

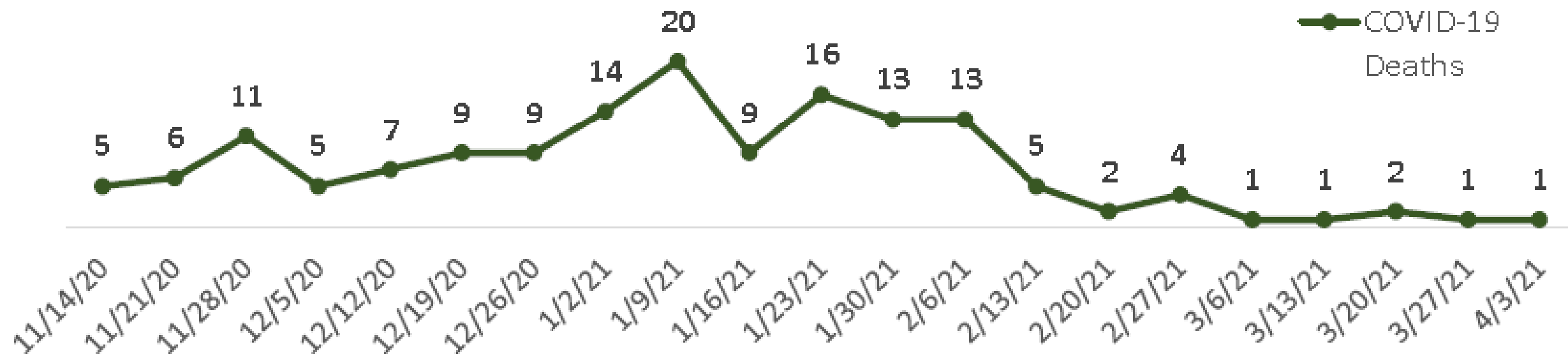
CCHHS School
Update report as of
April 9, 2021

*Hospital bed availability is determined based on bed availability as well as standard staffing schedules. Additional beds may be available that are not currently staffed.



CCHHS: COVID-19 Related Deaths

Weekly COVID-19 Deaths Among Coconino County Residents:





CCHHS: Community Transmission

Community Transmission

- Coconino County has a current incidence rate of 86.9 per 100,000, percent positivity of 3.7%*, and COVID-19-Like-Illness incidence (CLI) of 1.2%**.
- Coconino County is currently at a moderate*** level of community transmission.

Benchmarks	Minimal	Moderate	Substantial
Cases	<10 cases/100,000	10-100 cases/100,000	>100 cases/100,000
Percent Positivity	<5%	5-10%	>10%
COVID-19-Like-Illness	<5%	5-10%	>10%



CCHHS: Community Vaccination

Doses in Coconino

Total number of COVID-19 vaccine doses administered: **104,805**

Total number of COVID-19 vaccine doses ordered: **80,190**

Percent of COVID-19 vaccine doses utilized: **130.7%**

People in Coconino

Total number of people who have received at least one dose of COVID-19: **61,958**

Percent of people vaccinated: **42.1%**

Number of people who are fully vaccinated against COVID-19: **42,306**



NAH: Hospital Census

Flagstaff Medical Center Hospital Census

188

In House COVID-19 Patients

Positive

6

Pending

1

Hospital Capacity

188

0 50 100 150 200 250 300
Beds

Critical Care Capacity

30

0 5 10 15 20 25 30 35 40 45 50 55
Beds

Data as of April 13, 2021

Re-Entry Plan Discussion



Monitoring Criteria & Phases



City's Monitoring Criteria

- Downward trajectory over four or more weeks
- Demonstrated ability to follow CDC guidelines
- Healthcare facility capacity for seriously ill
- Ability to provide testing, monitoring and contact tracing





Phase II



- City operations and meetings function remotely
- Majority of City facilities closed to public
- Essential services are performed in-person and on-site
- Special events are limited to 50
- Most outdoor park and court amenities are open
- Field permits limited to 100 people
- Visitor's Center and Jay Lively Ice Arena are open on limited basis
- Travel and group gatherings are suspended or held remotely



Phase II



- Most City facilities will be open to public with limited services
- City meetings will continue remotely
- Seating areas will be closed to discourage congregating
- Protective measures in place
- Continued emphasis on working remotely
- Indoor recreation facilities may begin staged opening
- Special events and permits are less limited
- Limited travel

Reopening City Facilities





Re-Entry Plan: Reopening City Facilities

- Standard hours of operation for most City facilities
- Recreation and Library facilities will open according to Site Specific Plan
- COVID mitigation measures
 - Signs and messaging
 - Wearing a face covering and physical distancing
 - Protective guards and markings
 - Common seating areas closed
 - Sanitizing wipes or liquids available throughout building
 - Larger meetings will continue remotely including City Council meetings
 - Employee travel remains limited

Special Event Permits





Re-Entry Plan: Event Permits Review

- Outdoor Special Event Permits on City Property for up to 50 individuals currently
- City's Special Event Ordinance City Code 8-12-001-0002
 - allows the City to place reasonable conditions on any permit approval, including conditions that require the permittee to take measures to provide for the health and safety of the public
 - allows the City to deny a permit on the grounds that the event would present an unreasonable danger to the public health or safety



Re-Entry Plan: Event Permits Review

CDC Guidelines

- Recommends large gatherings be avoided, particularly when physical distance cannot be maintained
- Promoting healthy behaviors to reduce the spread

Stay home when appropriate	Cleaning & disinfection
Physical distancing	Limit restroom occupancy
Wear masks	Ventilation
Hand hygiene	Modified layouts
Respiratory etiquette	Physical barriers and guides
Signs and messages	Discourage shared objects

<https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/considerations-for-events-gatherings.html>

Options for Consideration





Re-Entry Plan: Reopening Options

- Option 1: Continue to evaluate existing “Monitoring Criteria” to determine the appropriate time to reopen City facilities to the public
- Option 2: Pick a future date to reopen City facilities to the public
- Option 3: Update “Monitoring Criteria” to include a vaccination measurement and use this in addition to or instead of others to determine the appropriate time to reopen City facilities to the public



Re-Entry Plan: Event Permit Options

- Option 1: Focus on COVID mitigation efforts that align with CDC and not limit number of attendees
 - Displaying signs and message boards
 - Wearing masks and physical distancing
 - Planning for modified layouts, physical barriers and guides
 - Hand cleaning/sanitizing stations
 - Cleaning and disinfection protocols
- Option 2: Start with a capacity calculator and update based on type of event, set up, organization and attendees
- Option 3: Select a specified number of attendees allowed at an event with COVID mitigation efforts