

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF SPRINGFIELD, MISSOURI
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I. INTRODUCTION AND EXECUTIVE SUMMARY

A. Introduction

The City of Springfield has a long-standing commitment to promote equal housing access without discrimination based on race, creed, color, sex, religion, handicap, familial status, natural origin, or ancestry. The City Council created the Mayor's Commission on Human Rights and Community Relations in 1964 to promote understanding and respect among all citizens and provides the community recourse for discriminatory acts. The City Springfield has a fair housing ordinance that has been in place since 1969. That ordinance has been amended so it matches the requirements of state and federal law. City Council adopted a Fair Housing Plan as an element of Springfield's Comprehensive Plan in 1990. An amendment to the City's budget was adopted in 1998 for the purpose of promoting community awareness of fair housing laws.

The Fair Housing Act of 1968 required that all programs of the Department of Housing and Urban Development be administered in a manner to "affirmatively further fair housing". In conjunction with the fair housing requirements of the Community Development Block Grant (CDBG) Program, the City of Springfield first conducted a formal Analysis of Impediments to Fair Housing adopted by City Council in January 1997. The impediments identified in that Analysis have been reviewed and benchmarked each year as part of the City of Springfield's annual Consolidated Plan and Consolidated Annual Performance and Evaluation Report (CAPER). While HUD does not currently have a requirement that each participating jurisdiction update their analysis at any predetermined time, HUD recommends keeping it up-to-date. The 1997 Analysis was updated in July 2006. A few of the findings from the 2006 Analysis included: the City's zoning ordinance does not act as an impediment to fair housing; the City actively participates in neighborhood revitalization through various programs; the City's very low tax rate has very little effect on development; private lending and real estate practices are not seen as impediments to obtaining fair housing; and, there does not appear to be any evidence of unlawful segregation or housing discrimination as monitored by the Mayor's Commission on Human Rights.

Several factors made this an appropriate time to produce this new Analysis. First, data is now available from the 2010 U.S. Census and comparisons can be made to the year 2000 which this document provides. Second, data from the census shows potential impacts the recent recession has had on the ability of all citizens to obtain fair housing. As a result, it's time to review and possibly reevaluate any impediments to fair housing choice.

B. Executive Summary

Springfield has not experienced a level of change in factors that would be thought to have a substantial impact on fair housing. However, changes have occurred since the year 2000 and a combination of these factors may result in impediments for fair housing choice. While the white population is still dominant, minority races have increased to make Springfield more diverse similar to the entire country and Missouri. The City's population has gotten slightly older but our median age has increased more slowly than the country's. More of our population lives alone than ten years ago. More households have lost income perhaps due to the recent recession and the median income actually dropped since 2000. The City's cost of living is less than the country's as a whole with the housing category less than 80 percent of the nation's average. There are now more housing units being rented now than owner-occupied units, a reversal from 2000. As evidence of this, about 5,000 units in buildings with three or more rental units were added during the last ten years while 3,600 single family units were added. To meet the demand of those living alone, 2,500 housing units with one or no bedrooms were added. Rents increased and 58 percent of households are paying more than 30 percent of their income for rent.

The City experienced several affordable-housing related successes since the 2006 Analysis of Impediments. The Mayor's Commission on Human Rights and Community Relations adopted a strategic plan in 2010 that included prioritizing actions to provide housing related information to the community. A draft of the next 20 year strategic plan, The Field Guide 2030, has been prepared. It includes thirteen chapters including one for housing of which its affordability is a focus. The 2010-2014 Consolidated Plan includes activities needed to address housing needs including those identified in the Analysis of Impediments to Fair Housing Choice. The Affordable Housing Center, established in conjunction with the City and the Community Partnership of the Ozarks, provides a "one-stop shop" that assists in providing housing for low-income household by reducing barriers to fair housing. Several land development ordinance amendments have been approved by City Council that help remove or reduce barriers to fair housing choice.

The data presented in this document leads to several possible impediments. Population aging by itself is not an impediment to fair housing choice. But combine that with the increased percentage of those over 65 residing by themselves could be an impediment. Low-earning households are a concern since rents and housing prices are increasing. Gentrification of poorer city neighborhoods is good for the community as a whole but could be an impediment since it can replace low-income housing with market-rate units. Housing discrimination reporting may be an impediment as there are several reasons for it not occurring. There is a long waiting list for Public Housing units, particularly larger units and single family housing. These possible impediments to fair housing choice need to be investigated to determine whether they are truly impediments and, if they are, paths need to be developed which will result in methods to their mitigation.

Draft copies of this Analysis of Impediments were presented to and reviewed by the Housing Collaborative and the Mayor's Commission on Human Rights and Community Relations in public meetings. Copies were also sent to the NAACP and Grupo Latino Americano for their review.

The City of Springfield places a great deal of emphasis on the development of affordable housing, a key component to fair housing choice. While housing in Springfield is generally recognized as being more affordable than in many other parts of the country, affordable housing is still a problem recognized by the community. A review of impediments identified in previous AI's indicates that the City is making progress to address the affordable housing concerns. However, as with most other communities, many of the problems are difficult to address with limited funds and resources.

II. BACKGROUND DATA

Updated information for the City of Springfield is necessary to develop a better understanding of the availability, affordability, and accessibility of housing in the community and what might be impediments to fair housing for everyone. The following background is limited to the City of Springfield and is provided to help the reader understand issues that may relate to fair housing choice. Unless stated otherwise, data in this document are from the 2000 and 2010 U.S. Census.

A. Demographic Profile of Springfield, Missouri

1. Population and Race Characteristics

Springfield's population grew over five percent between 2000 and 2010 (Table 1) according to U.S. Census data for those years. Following Missouri and national trends, Springfield's white population has declined relative to other races. The City's white population, however, continues to be the predominant race at over 88% of the total population. As indicated below, Springfield has a comparatively small minority population, compared to Missouri and the United States at slightly more than eleven percent of the total population. However, it is becoming more diverse with all

racess, other than white, increasing proportionately, also in keeping with trends in Missouri and the United States. Blacks, in particular, grew by 24% during this period to become more than four percent of total population. Hispanics, which are not considered a race by the U.S. Census, increased by 60% during those ten years.

**Table 1: RACE PERCENTAGE COMPARISON
2010 - With Percentage Changes From 2000 Percentages**

	United States – 2010	Missouri – 2010	Springfield – 2010
Changes from 2000 are in parentheses			
Total Population	308,745,538 (+9.7%)***	5,988,927 (+7.0%)***	159,498 (+5.2%)***
White	72.4% (-3.6%)	82.8% (-2.5%)	88.7% (-3.3%)****
Black	12.6% (+2.4%)	11.6% (+3.6%)	4.1% (+24.2%)****
Native American*	1.1% (+10.0%)	0.6% (+2.0%)	1.0% (+11.1%)****
Asian	4.8% (+33.3%)	1.6% (+45.5%)	1.9% (+35.7%)****
Other	6.2% (+12.7%)	1.3% (+62.5%)	1.2% (+33.3%)****
Two or More Races	2.9% (+20.8%)	2.1% (+40.0%)	3.2% (+60.0%)****
Hispanic/Latino**	16.3% (+30.4%)	3.5% (+66.7%)	3.4% (+60.1%)****
*American Indian, Alaska Native, Native Hawaiian and other Pacific Islanders			
**Hispanic/Latino considered an ethnicity, not a race			
***Percentage change since 2000			
****Percentage change from 2000 percent			

2. Age Characteristics

Springfield's population is aging, as is Missouri's and the nation's (Table 2). The percentage of Springfield's population under 18 years of age decreased slightly faster than Missouri's and the nation's. That population cohort within the City is smaller than the state's and the nation's at 18% versus about 24% for the State and nation. The percentage of those 62 and over is increasing although Springfield's population is aging less rapidly than the countries and Missouri's. This older age cohort is more than seventeen percent of the City's total population, slightly higher than Missouri's but more than a full percentage point greater than the nation. Springfield's median age has increased more slowly than the nation's and Missouri's and our median age is younger than the nations and Missouri's by four years. The largest concentration of Springfield's older citizens is in the southeast section of the city (Table 3) according to Zip Code data (see Zip Code Map). The Center City has the City's youngest median age at 26 years in contrast with the City's average of 33 years.

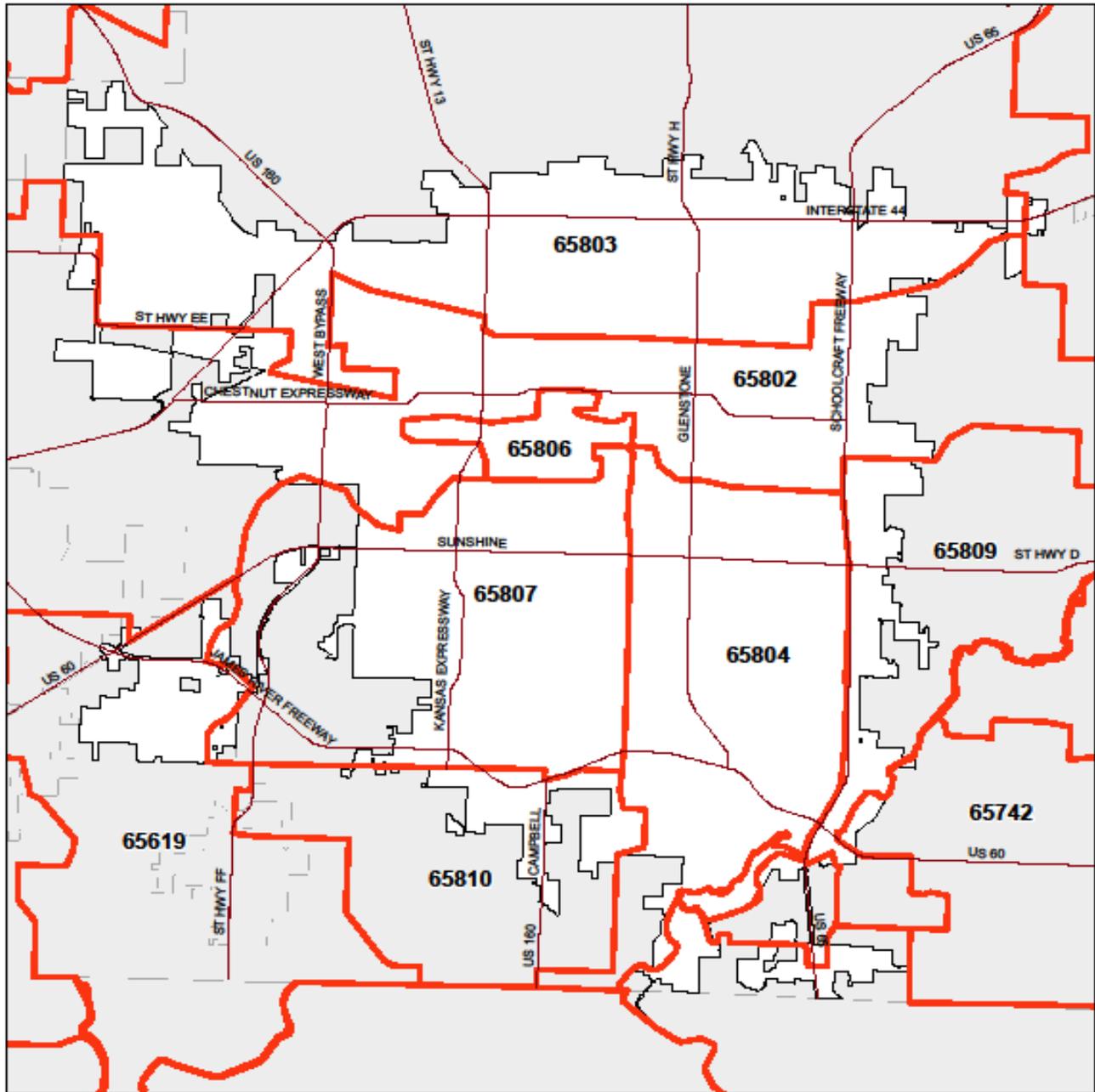
**Table 2: POPULATION AGE COMPARISON
2010 – With Percentage Changes From 2000**

	United States – 2010	Missouri – 2010	Springfield – 2010
Under Age 18	24.0%** (-6.6%)*	23.8%** (-6.7%)*	29,176 (18.3%)** (-8.0%)*
Age 62 and Over	16.2%** (+10.2%)*	17.2%** (+8.2%)*	27,582 (17.3%)** (+1.8%)*
Median Age - years	37.2 (+1.9 yrs)	37.9 (+1.8 yrs)	33.2 (+0.3 yrs)
*Percentage change from 2000 percentage			
**Percentage of entire population			

**Table 3: POPULATION AGE COMPARISON
2010 – Percentage of Total Zip Code Population**

Zip Code*	Under Age 18	Age 62 and Over	Median Age (years)
65802	21.8%	13.9%	32.2
65803	21.8%	16.8%	36.7
65804	18.2%	23.0%	40.8
65806	13.3%	7.8%	26.2
65807	17.3%	17.0%	31.3
65809	22.1%	24.2%	47.0
65810	24.6%	17.6%	39.5
Averages	18.3%	17.3%	33.2
Note: Each Zip Code, except 65806, is located both inside and outside the Springfield city limits			
*See Zip Code Map			

Springfield, Missouri Zip Codes



City of Springfield, Missouri

0 2,000 4,000 8,000 12,000 16,000 Feet

 Zip Code Boundaries
 City Limit Boundary



DISCLAIMER: All information included on this map or digital file is provided "as is" for general information purposes only. The City of Springfield, and all other contributing data suppliers, make no warranties, representation or implied, concerning the accuracy, completeness, reliability, or suitability of the data for any particular use. Furthermore, the City of Springfield, and all other contributing data suppliers, assume no liability whatsoever associated with the use or misuse of the data.

3. Household Characteristics

A review of selected City of Springfield household characteristics (Table 4) may reveal the types of housing units needed to house the city's special populations. The total number of households in Springfield has increased by almost eight percent during this period compared with a five percent increase in the city's population. The percentage of households with children under 18 years dropped by more than 10 percent in ten years to less than twelve percent of all households. The number of female headed households, with no husband present, with children under 18 years increased slightly but its percentage of all households remained the same as in 2000 at under seven percent. The number of householders living alone increased by over three thousand individuals to more than 37% of all City households. Householders living alone and over 65 years increased slightly to nearly 12% of all City households.

**Table 4: SELECTED HOUSEHOLD CHARACTERISTICS
2010 - With Percentage Comparisons to 2000**

	2000	2010
Total Number of Households	64,691	69,754 (+7.8%)***
Households w/Individuals Under 18 Years	16,917 (26.2%)*	16,312 (23.4%)* (-10.7%)**
Female Householder (no husband) w/Children Under 18 Years	4,336 (6.7%)*	4,662 (6.7%)* (0%)**
Householder Living Alone	22,813 (35.3%)*	26,039(37.3%)* (+5.7%)**
Householder Living Alone and Over 65 Years	7,508 (11.6%)*	8,228(11.8%)* (+1.7%)**

*Percentage of all households
**Percentage change from 2000 percentage
***Percentage change from 2000

B. Household Income

Springfield's 2010 household median income was \$28,697 (Table 5), a 3% decline from \$29,563 in 2000. Broken down, 44 percent of households in 2010 earned less than \$25,000. About 29 percent of Springfield's households earned between \$25,000 and \$50,000 and about 27 percent earned more than \$50,000. These figures include about a 19 percent increase in the number of households earning less than \$25,000 since the 2000 Census, a 30 percent decline for households earning between \$25,000 and \$50,000 and over a 100% increase for households earning more than \$50,000. Declines may be attributable to the recent recession.

**Table 5: SPRINGFIELD HOUSEHOULD INCOME
2010 – With Percentage Changes Since 2000**

Annual Household Income	Percentage of all Households – 2010	Percentage Change since 2000**
Less than \$10,000	13.8%	+9.5%
\$10,000 to \$14,999	10.6%	+9.3%
\$15,000 to \$24,999	19.6%	-1.0%
\$25,000 to \$34,999	15.1%	-9.0%
\$35,000 to \$49,999	14.0%	-20.9%
\$50,000 to \$74,999	15.2%	+16.9%
\$75,000 to \$99,999	5.4%	+3.8%
\$100,000 to \$149,999	3.7%	+19.4%
\$150,000 to \$199,999	1.9%	+111.1%
\$200,000 or more	0.7%	-50.0%
Household Median Income	\$28,697	-2.9%
Families Below Poverty Level	7,240 (21.8%)* (+120%)***	3,670 (9.9%)*

*Percentage of all families
**Percentage change from 2000
***Percentage change from 2000 percentage

1. Income Characteristics

Table 6 indicates a much lower household income for Springfield's center city area (Zip Code 65806), with the higher incomes concentrated in the south and east sections of Springfield (Zip Codes 65809 and 65810). This is borne out by the final column indicating the percentage of people in a Zip Code rated at below the poverty level established by the U.S. Census. While about 20 percent of all Springfield's population age 18 and over live below the poverty level (as determined by the U.S. Census), over 41 percent of Center City residents (Zip Code 65806) are in this category. Overall, there are over 7,200 families, or almost 22% of all Springfield families, below the poverty level, a 120% increase since 2000.

**Table 6: HOUSEHOLD INCOME COMPARISON
2011 – By Zip Code***

Zip Code*	Income less than \$25,000	Income \$25,000 to \$50,000	Income more than \$50,000	Household Income below Poverty Level – People 18 & Over
65802	37.4%	31.2%	31.4%	20.3%
65803	34.9%	31.5%	33.6%	19.1%
65804	29.5%	28.4%	42.1%	12.2%
65806	62.3%	22.4%	15.3%	41.1%
65807	31.2%	32.6%	36.2%	18.3%
65809	8.2%	17.6%	74.2%	3.7%
65810	12.6%	23.1%	64.3%	5.0%
Averages	44.0%	29.1%	26.9%	20.5%

Note: Each Zip Code, except 65806, is located both inside and outside the Springfield city limits

*See Zip Code Map

2. Cost of Living

The ACCRA (American Chamber Of Commerce Researchers Association) Cost of Living Survey (prepared by The Council for Community and Economic Research) compares the costs for goods and services in communities (known as the Cost of Living or COL) the same costs and services in other communities and the U.S. as a whole. Table 7 lists the categories used in the survey and how they ranked in Springfield compared with the United States in 2005 and 2013. Springfield's composite (overall) score in 2005 was 89.4%. This means the COL in Springfield was 89.4% of the nation's as a whole in 2005. In other words, the overall COL in Springfield is cheaper than the nation. That score increased to 90% in 2013 meaning the composite score for Springfield got closer to the nation's, an average of 10% less. The cost for housing, compared to the country as a whole, decreased from 81.2% in 2005 to 78.3% indicating it's less expensive to afford, live in and maintain housing relative to the nation's costs for housing and that cost declined compared to the nation's.

**Table 7: COST OF LIVING CATEGORIES for SPRINGFIELD
Compared to National Average**

	Springfield – 2005 (percent of USA average)	Springfield – 2013 (percent of USA average)
Composite Score	89.4%	90.0%
Grocery	101.1%	97.4%
Housing	81.2%	78.3%
Utilities	72.0%	92.7%
Transportation	97.9%	96.2%
Health Care	93.3%	96.1%
Miscellaneous	95.4%	92.5%

Source: Council for Community and Economic Research

C. Housing

1. Selected Springfield Housing Characteristics

Changes to selected housing characteristics between the years 2000 and 2010 inside the City of Springfield, using U.S. Census data for those years, are shown in Table 8. The City's total number of housing units increased more than eleven percent. By comparison, the City's total population increased more slowly, by five percent (Table 1) and the number of households increased by nearly eight percent (Table 4). The owner/renter ratio in occupied housing units has reversed itself between 2000 and 2010. There were slightly more owner occupied housing units than rental units in 2000. Owner occupied housing units decreased to about 49% of all housing units in the City by 2010, while renter occupied housing increased to almost 51% of all housing units. There are now fewer owner occupied housing units than renter occupied housing units. This is accompanied by a decrease in the average household size for owner occupied units and a slight increase for rental occupied units by 2010. The percentage of vacant owner occupied units remained nearly the same between 2000 and 2010. The percentage of vacant renter housing increased significantly from slightly over seven percent in 2000 to slightly over thirteen percent in 2010.

**Table 8: SPRINGFIELD SELECTED HOUSING CHARACTERISTICS
2010 - Comparisons With 2000**

	2000	2010
Total housing units (h.u.)	69,877	78,070 (+11.7%)**
Owner occupied housing units	34,752 (53.6%)*	34,290 (49.2%)*
Renter occupied housing units	30,069 (46.4%)*	35,464 (50.8%)*
Vacant housing units	5,056 (7.2%)*	7,010 (9.1%)*
Owner occupied vacancy rate	2.5%*	2.3%*
Renter occupied vacancy rate	7.1%*	13.2%*
Average Household size – Owner occupied	2.27	2.19 (-3.5%)**
Average Household size – Renter occupied	2.06	2.08 (+1.0%)**
Built 1959 and before – Owner occupied	13,371	13,697 (+2.4%)**
Built 1959 and before – Renter occupied	8,784	8,527 (-2.9%)**
Single family dwellings (detached and attached)	48,039 (68.7%)*	51,698 (66.2%)*
Mobile homes	1,939 (2.8%)*	1,920 (2.5%)*
Duplex dwellings	3,315 (4.7%)*	2,923 (3.7%)*
Dwellings in Apartments (3 or more dwellings per structure)	16,536 (23.7%)*	21,529 (27.6%)* (+16.5%)***
Units Lacking Complete Plumbing Facilities	0.4%*	1.1%*
Units Lacking Complete Kitchen Facilities	0.6%*	2.3%*
Units w/no or one bedroom	12,155 (17.4%)*	14,705 (18.8%)* (+8.0%)***

*Percentage of total
**Percentage change from 2000
***Percentage change from 2000 percentage

Other characteristics in Table 8 provide a more complete picture of Springfield's housing stock and the changes during the ten years since 2000. Owner occupied housing built in 1959 or before increased slightly and the renter occupied housing built at that same time decreased slightly. Single-family housing units (both detached and attached) are the predominant housing type in Springfield. While the number of single-family units increased in those ten years, their percentage of all housing units decreased from nearly 69 percent to slightly more than 66 percent. Both mobile home and duplex units declined in both total numbers and percentages of all housing units. The percentage of structures inside the City with three or more housing units (labeled apartments in this table) increased significantly by more than 16 percent or 5,000 units. Two characteristics in Table 8, units lacking complete plumbing facilities and those lacking complete kitchen facilities, demonstrate housing conditions in Springfield. The percentages of all the housing units in both categories increased between 2000 and 2010 although the total number of units is quite small. Housing units with either no bedrooms or one bedroom increased in ten years by 21% to almost 19% of the City's total.

Locations of Springfield’s owner/rental-occupied housing by Zip Code are detailed in Table 9. The percentage of housing occupied by owners, during those ten years, dropped to less than 50% of all city households while more than 50% now rent. This statistic varies by location within the city. While 76% and 88% of households in the south and east (Zip Codes 65809 and 65810) own housing, 17% own in the city’s center city area (Zip Code 65806). In other words, over 83% of center city’s housing is rental units while less than 12% of the housing in Zip Code 65809 is occupied by renters.

**Table 9: OWNER-RENTER OCCUPANCY by ZIP CODE
2010 and Persons Per Dwelling**

Zip Code	Own Dwelling	Rent Dwelling
65802	58.7% (2.33 persons)	41.3% (2.34 persons)
65803	58.9% (2.36 persons)	41.1% (2.28 persons)
65804	59.7% (2.17 persons)	40.3% (2.03 persons)
65806	17.0% (2.13 persons)	83.0% (1.81 persons)
65807	49.7% (2.22 persons)	50.3% (2.08 persons)
65809	88.1% (2.55 persons)	11.9% (2.16 persons)
65810	76.2% (2.66 persons)	23.8% (2.09 persons)
Averages	49.2% (2.19 persons)	50.8% (2.08 persons)

Note: Each Zip Code, except 65806, is located both inside and outside the Springfield city limits

2. Assisted Housing

The Housing Authority of the City of Springfield (HAS) currently has 765 Public Housing units and 584 Section 8 certificates and vouchers. The latest Public Housing inventory is detailed in Table 10. The U.S. Department of Housing and Urban Development “rates” each housing authority. HAS received a rating of “Standard Performance” in 2012.

Table 10: PUBLIC HOUSING AUTHORITY INVENTORY*

Project	Total Units	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heritage Tower, 515 Mt. Vernon	97	64	32	1			
Madison Tower, 421 West Madison	130	100	30				
South Tower, 770 South Avenue	84	63	21				
Cedarbrook Apts., 811 N. Cedarbrook	80		24	32	16	8	
Villa Marie Apts., Villa Marie & Norton Road	32		3	15	10	4	
Bolivar Rd. Apts., 2336 Bolivar Rd	81		18	33	20	8	2
Glenwood Apts., 722 E. Glenwood	33			13	20		
Circle Apts., S. Wedgewood, S. Weaver, N. Delaware	30		5	22	3		
Stillwell Columns, 525 S. Campbell	142		141	1			
Dogwood Square (2 sites)	24		24				
Scattered Sites	32			16	16		
Totals	765	227	298	133	85	20	2

*From the Housing Authority of Springfield

3. Area Housing Costs

Average home sales prices (determined by the Greater Springfield Board of Realtors) by Zip Code (Table 11) generally follow the income levels seen in Table 6. The table shows residential sales for the fourth quarter of 2012 compared to the fourth quarter of 2003. Where average income was higher in Springfield, the average prices for home sales during that quarter were also higher. Average prices have risen in the City as a whole and in all Zip Codes except the Center City (Zip Code 65806). Average prices for homes sold in Zip Codes 65809 and 65810 were the highest averaging \$193,000 and \$285,000 respectively. Zip Code 65806 had the lowest average home sales price as well as the

lowest average income level. Sales prices increased in the entire city by 10.8% between 2003 and 2012. In comparison, the average sales' price rose 54% between 1990 and 2005 based on data reported in the previous Analysis of Impediments.

Dwelling unit rents are more expensive in the ten years since 2000 (Table 12). Sixty percent of rental units rented for \$500 or less in 2000. That percentage dropped to 31% in 2010 and 60% rented for \$500 or more. Median rent increased by 34% to \$607. The U.S. Department of Housing and Urban Development uses 30% of a household's income as a benchmark for the appropriate amount a household should pay for rent. Fifty-eight percent of renters paid more than 30% of their income for rent in 2010.

**Table 11: HOME SALES PRICES – 2012
With Comparisons to 2003 (in parentheses)**

Zip Code	Average Sale Price	Number of Homes Sold
65802	\$98,800 (\$89,419)	536 (786)
65803	\$88,472 (\$82,614)	443 (609)
65804	\$146,536 (\$131,450)	545 (642)
65806	\$45,518 (\$59,203)	53 (101)
65807	\$105,164 (\$104,770)	611 (933)
65809	\$285,412 (\$247,470)	201 (231)
65810	\$193,202 (\$179,445)	373 (531)
Averages/Totals	\$133,277 (\$120,332)	2762 (3833)

Source: Greater Springfield Board of Realtors

Note: Each Zip Code, except 65806, is located both inside and outside the Springfield city limits

**Table 12: RENTS PAID and RENTS COMPARED with INCOME – 2010
With Comparisons to 2000**

	Rents Paid – by Household		Rents as a Percentage of Household Income		
	2000	2010		2000	2010
Less than \$300	3,719	1,668 (-55%)*	Less than 20%	9,291 (31.1%)**	6,823 (20.5%)**
\$300 - \$499	13,773	8,856 (-35.7%)*	20 to 24.9%	4,218 (14.1%)**	3,323 (10%)**
\$500 - \$749	8,850	13,691 (+54.7%)*	25 to 29.9%	3,525 (11.8%)**	3,766 (11.3%)**
\$750 - \$999	1,909	6,584 (+244%)*	30 to 34.9%	2,134 (7.1%)**	2,209 (6.6%)**
More than \$1,000	665	2,969 (+346%)*	More than 35%	9,348 (31.2%)**	17,216 (51.6%)**
Median Rent	\$452	\$607 (+34.3%)*	Not Computed	1,452 (4.8%)**	N/A

*Percentage change since 2000

**Percentage of household income

4. Housing Growth Patterns

Zip Code data from the U.S. Census for 2000 and 2010 demonstrates where the greatest housing growth is occurring in Springfield (Table 13). The fastest growth is to the southwest in Zip Codes 65810 and 65807. Zip Code 65810 has the fastest growth with an increase of 46% in the number of housing units in those ten years. Zip Code 65807, also in the southwest, has over a 20% increase in the number of housing units. This Zip Code has also seen the highest number of housing units with over 4,300 units in ten years. Zip Code 65806, encompassing the center of Springfield, actually lost housing units in this decade. Comparing all Zip Codes with the entire city, housing unit growth has occurred fastest in the eastern, southern, and southwestern areas. Aside from Zip Code 65806, growth has occurred in Zip Codes 65802, 03 and 04 but not as fast as the other Zip Codes or the City as a whole.

Table 13: TOTAL HOUSING UNITS by ZIP CODES – 2010*
With Comparisons to 2000 (in parentheses)

Zip Code	2000	2010	Change
65802	17,209	19,682	+2,473 (+14.4%)**
65803	16,416	18,732	+2,316 (+14/1%)**
65804	17,525	18,923	+1,398 (+8.0%)**
65806	6,028	6,008	-20 (-0.3%)**
65807	21,282	25,655	+4,373 (+20.5%)**
65809	3,591	4,629	+1,038 (+29.0%)**
65810	6,016	8,789	+2,773 (+46.1%)**
Totals/Averages	88,067	102,418	+14,351 (+16.3%)**

*Includes all housing unit types

**Percentage change since 2000

5. Fair Market Rents

Fair Market Rents are established annually by the U.S. Housing and Development Department. They are to ensure low and moderate income households pay an appropriate share of their income for housing provided through HUD programs. Table 14 demonstrates these rents for years 2000 and 2010. Increases range from 38 percent to almost 57 percent during that time.

Table 14: FAIR MARKET RENTS – 2010
With Changes From 2000 in Parentheses

	0 BR	1 BR	2 BR	3 BR	4 BR
2010	\$404 (+51.0%)*	\$477 (+40.3%)*	\$610 (+38.6%)*	\$869 (+42.9%)*	\$993 (+56.9%)*
2000	\$268	\$340	\$440	\$608	\$633

*Percentage change from 2000

D. Employment

The City of Springfield is recognized as a community with a diverse labor force. This has been a factor in maintaining a relatively consistent unemployment rate. Table 15 shows the top 10 employers in Springfield at the time of the original previous Analysis of Impediments report in 2006 compared with the current top 10 employers. Springfield has a strong health care industry, as evidenced by the employers in the top two positions. The employers are not concentrated in any one geographic area of the city. As with much of the nation, the percentage of major employers in manufacturing has decreased over the last decade. This is normally not a favorable trend for residents in the low-to-moderate income groups.

The City of Springfield Department of Economic Development works with other government and local partners to retain existing employers and secure new employers who will provide jobs at wage levels needed to provide a living wage for area residents.

Table 15: TOP 10 EMPLOYERS IN SPRINGFIELD AREA*
(as of Summer 2011)

1	Cox Health	8,815	Mercy Health System (St. John's)	9,036
2	St. John's Health Systems	8,000	Cox Health Systems	7,560
3	Wal-Mart Stores	4,120	Wal-Mart Stores, Inc.	4,000
4	Springfield Public Schools	3,000	Springfield Public Schools	2,911
5	Bass Pro Shops/Tracker Marine	2,615	United States Government	2,500
6	United States Government	2,540	Bass Pro Shops/Tracker Marine	2,363
7	State of Missouri	2,385	State of Missouri	2,306
8	Missouri State University	2,130	Missouri State University	2,149
9	Chase Card Services	1,595	O'Reilly Auto Parts (HQ)	1,673
10	City of Springfield	1,535	Citizens Memorial Healthcare	1,600

*Data for Springfield, Missouri MSA (Counties of Greene, Christian, Webster, Polk and Dallas)

E. Transportation

The City of Springfield has a transportation system which provides access for much of its population. The City is generally bounded by Interstate 44 on the north and US 65 on the east, with US 60 (James River Freeway) connecting to these routes on the south and west. A network of arterials, collector and local streets supplement these highways along with bike and walking routes, a public bus service run by City Utilities, a special handicapped-accessible bus system (Access Express) also run by City Utilities, for special needs individuals. A rideshare program is available and has been in existence for many years.

III. EVALUATION OF FAIR HOUSING DISCRIMINATION

A. Current Fair Housing Complaint Status

The Mayor's Commission on Human Rights and Community Relations (MCHRRCR) has served the Springfield community since 1964 as the agency charged with tracking and facilitating reports of alleged discrimination including housing discrimination. A view that is shared by the MCHRRCR as well as many of its counterpart agencies throughout the nation is that many instances of housing discrimination go unreported. The reasons for this vary, ranging from lack of knowledge on behalf of the alleged victims regarding fair housing rights, lack of knowledge on the part of alleged discriminators of what they are doing, how to file a complaint, to fear of retribution, or simply apathy. Some residents do not want to invest the time necessary to see a complaint through from beginning to end.

Since the commission was reorganized in 2010 there has been a renewed commitment to publicizing their existence and their services to the community in local newspapers, on the radio (including Spanish language radio) and at booths at community events. As a result, the commission is seeing an increase in the number of complaints made to MCHRRCR. A significant majority of complaints, however, deal with employment rather than with housing and, so, is outside the purview of this Analysis.

Table 16 indicates the number of actual complaint reports filed with the MCHRRCR from 2004 through the current date, as well as the type of complaint filed. No MCHRRCR data is available between 2006 and 2009 due to staffing cutbacks resulting from the recession.

**Table 16: FAIR HOUSING COMPLAINTS for SPRINGFIELD, MISSOURI
2004 - 2012**

Category	2004	2005	2006	2007	2008	2009	2010	2011	2012	Totals
Disability			X	X	X	X	2	6	8	16
Familial Status	1		X	X	X	X	1	2		4
Familial Status & Disability			X	X	X	X	1			1
Gender/Sex			X	X	X	X	2	1	3	6
Color/Nat'l. Origin	1		X	X	X	X	1			2
Race		3	X	X	X	X		3	5	11
Race by Association	1		X	X	X	X	1			2
Religion			X	X	X	X	1			1
Totals	3	3	X	X	X	X	9	12	16	43

Source: The Mayor's Commission on Human Rights and Community Relations
X = No data is available due to staffing cutbacks resulting from the recession

B. Analysis of Discrimination

1. Discrimination on the Basis of Disability

Discrimination related to disabilities may occur in less obvious forms than other types of discrimination. In the case of physical disabilities, lack of access such as ramps and accommodations such as doorways of sufficient width or countertops of functional height are often a problem in affordable housing. Current federal law requires that landlords make reasonable accommodation for the disabled; however, the tenant may hesitate to complain, be unaware of their rights, or simply not have the time to wait for the accommodations to be made. New multi-family developments must have units either partially or totally accessible depending on the number of units within the development. New buildings and facilities are required to be designed and constructed to be accessible in accordance with the City's codes. The reality, however, is that most affordable housing units are in older units that may not be feasible to renovate. For many years, the City of Springfield has funded a barrier removal program administered for disabled seniors by a local nonprofit organization.

In the case of mental disabilities, discrimination may arise from the landlord's perception that a tenant with mental disabilities may create liability or problems with neighbors or other tenants. While group housing for the mentally disabled may face neighborhood resistance, the City permits residential group homes in single family residential districts without any public review provided no more than eight such residents plus two houseparents will occupy the unit. Available data (Table 16) show that Springfield has experienced 16 reported cases of discrimination based on disability, with one case reported involving familial status and disability.

2. Discrimination on the Basis of Familial Status

According to housing providers, it is thought this type of discrimination occurs in most markets, but may often go unreported. There does appear to be a shortage of affordable housing units for larger family units in the Springfield area. A local nonprofit participating in the City of Springfield HOME rental production program is making a concerted effort to address the problem by choosing to construct four-bedroom units rather than three-bedroom units whenever possible. Fair housing rents for the Springfield MSA, however, do not make this practical for many developers as the difference in rents do not usually justify the increased cost to develop. During the past nine years, Springfield has experienced four reported cases of discrimination based on familial status, with one additional case reported involving familial status and disability.

3. Discrimination on the Basis of Gender/Sex

This type of discrimination could be the result of a landlord failing to rent to a prospective tenant based on the tenant's sex or gender including sexual preference or orientation. Available data show six cases in the last nine years. The MCHRRCR recommends the city put an effective method of tracking discrimination in place based on gender/sex orientation because they believe this type of discrimination is underreported.

4. Discrimination Based on Race, Color or National Origin

The City of Springfield has a small minority population. A common trend shared by Springfield and many other parts of the nation is the blending of races and nationalities. This makes for some confusion in the reporting of any statistics regarding race, ethnicity, color or national origin. There has also been a change in reporting with regard to Hispanics, as they are not classified as a separate race but an ethnicity. This makes the comparison of data from one period to the next harder to track. While this distinction in reporting makes it difficult to determine the exact increase in percentages, it is recognized that the Hispanic community has been one of the largest growth segments in the Springfield area at 60% when comparing their share of the total population from 2000 to 2010.

In Springfield, the nine-year total for complaints based on race, color or national origin, and race

by association was 15. The 2006 Analysis of Impediments identified 15 complaints for the ten-year period between 1996 and 2005. Considering data was not collected for four years, it's possible the total for these three categories could be larger.

5. Discrimination on the Basis of Religion

This category of discrimination had only one case reported in Springfield during the last nine-year period.

IV. DISCUSSION OF THE 2006 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Several impediments to fair housing choice were identified in the 2006 Analysis of Impediments to Fair Housing Choice. They are as follows:

A. Public Sector

The 2006 analysis stated "Springfield's public policies and related controls do not appear to impede fair housing choice".

1. Zoning and Site Selection

No comments in the 2006 Analysis point to impediments to fair housing choice. Several positive amendments were made to the zoning ordinance which allowed for a wider range of housing types in a variety of zoning districts. Smaller lot sizes were allowed for residential use provided certain conditions are met. The City adopted a Dangerous Building Ordinance which resulted in these buildings either being razed or rehabilitated. This resulted in either new vacant lots for construction or habitable housing units. The City's grant and loan programs have resulted in either new housing or rehabilitating existing units.

2. Neighborhood Revitalization

No comments in the 2006 Analysis point to impediments to fair housing choice. The City's grant and loan programs resulted in either constructing new housing or rehabilitating existing units.

3. Public Housing Authority and Other Assisted Housing Choices

This discussion in the 2006 Analysis pointed out there's always a long waiting list for larger units and single-family homes.

4. Sale of Subsidized Housing and Possible Displacement

The concern that several affordable housing unit contracts were ready to expire, as discussed in the 2006 Analysis, did not materialize.

5. Property Tax Policies

Springfield's low property tax rate, as stated in the 2006 Analysis, was thought to have "very little effect on development".

6. Local Administrative Boards

The Planning and Zoning Commission had no minority members and City Council had one at that time. The 2006 Analysis did not list this criterion as an impediment to fair housing choice.

B. Private Sector

1. Lending Policies and Practices

The 2006 Analysis stated the City was not aware of any lending discrimination in Springfield but

suggested further research through Home Mortgage Disclosure Act (HMDA) data. Further research was undertaken and a review of the current HMDA data indicated no Springfield banks were discriminating based on the HMDA and examinations by the Federal Financial Institutions Examination Council and the Office of the Comptroller of the Currency. Therefore, there were no identified impediments to fair housing choice.

2. Real Estate Practices.

No comments in the 2006 Analysis pointed to any impediments to fair housing choice.

C. Public and Private Practices.

No comments in the 2006 Analysis pointed to any impediments to fair housing choice.

D. Determination of Unlawful Segregation or Other Housing Discrimination

While some concentrations of minorities exist in the City according to U.S. Census data, they were not considered significant nor was there evidence of unlawful segregation or housing discrimination according to the 2006 Analysis.

V. SUCCESS IN REMOVING IMPEDIMENTS TO FAIR HOUSING CHOICE SINCE 2006

Progress has been made by the City of Springfield in its efforts to improve its goal of promoting equal access to housing. The following changes have occurred since the 2006 Analysis of Impediments to Fair Housing Choice.

A. Strategic Plan – Mayor’s Commission on Human Rights and Community Relations

The Mayor’s Commission on Human Rights and Community Relations (MCHRRCR) prepared its Strategic Plan in 2010 and updated it in 2012. This document established priorities and goals for the Commission and it included the following specific actions to reach out to the community to provide it with information on their rights and to provide help if necessary:

- Periodically reporting to City Council on the Commission’s activities
- Creating a more effective website presence
- Informing any public entity when residents report infringement of human rights or mutual respect
- The Commission would publicly recognize businesses and individuals who model best practices regarding diversity and human rights initiatives
- Collaborate with City schools to teach diversity within school
- Advocate for and advise City Council to adopt a universal design ordinance for all newly built or rehabilitated housing funded by HUD as well as in any public facility
- Track and make known the City’s changing diverse population
- Serve as the designated agency, recognized by HUD, to affirmatively further fair housing

The last action statement listed above stresses MCHRRCR’s role to address impediments to fair housing.

B. Strategic Plan (Field Guide 2030) – Community Planning Process

Thirteen citizen-populated planning committees were formed to address the needs of and enhance the strengths of Springfield. These committees are evaluating what works and what needs

improvement in an effort to create a vision for the next twenty years. This strategic plan contains thirteen chapters including one for housing. The committee on housing focused on three areas: new construction; urban living and development; and, affordability. The committee's vision includes one major, short-term, goal of establishing a Housing and Neighborhoods Office and the following long-term goals:

- Promote diversity of housing types in development and re-development patterns
- Initiate and implement meaningful regulation/certification reform.
- Develop and establish a local "Angie's List" format for voluntary scoring of rental housing.
- Expand incentives and means for funding effective efficiency improvements of the area's housing stock.
- Identify a two-year pilot program to evaluate advantages and disadvantages of broader rental registration and inspection program.
- Pursue and expand assistance programs for residents to obtain and maintain housing that is affordable.
- Encourage consortium and other private models to expand availability of affordable housing.

Putting forth a planning document with its objectives, performance measures, responsible groups and cost estimates will assist Springfield in developing affordable housing.

C. Consolidated Plan 2010-2014

During the fall of 2008, a community survey was undertaken for the City. The purpose of the survey was to assess satisfaction with the delivery of major city services and to help determine priorities for the community. Twenty-nine percent of those surveyed felt it is important to continue planning and delivering affordable housing. HUD states the Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. Springfield's Consolidated Plan listed the following activities needed to address housing needs:

- Continue the City's Comprehensive Housing Assistance Program through the CDBG and HOME Programs, which provides financing for housing rehabilitation, purchase and clearance or rehabilitation of substandard units, and down payment and closing costs for homebuyers.
- Fair Housing and Equal Opportunity.
- Increase emergency and minor repair.
- Encourage the continued use of Low Income Housing Tax Credits to finance new rental housing for low-income households.
- Encourage private financing and programs such as special financing that several local lending institutions have created, and non-profit ventures such as the Affordable Housing Action Board, Burrell Center, etc.
- Encourage continued assistance through other governmental agencies such as the Department of Housing and Urban Development, Missouri Housing Development Commission, Missouri Department of Mental Health, etc.
- Encourage continued support for housing development in the center city through the Community Development Corporations and programs (Urban Neighborhoods Alliance and Urban Districts Alliance).
- Encourage the production of quality affordable housing units by groups such as Habitat for Humanity, Sherman Avenue Project Area Committee, and the Affordable Housing Action Board.
- Encourage sustainable housing development, including utilizing LEED and Energy Star standards.
- Encourage creation of accessible housing units, including universal design.
- Continue providing comprehensive neighborhood improvement programs.

D. Affordable Housing Center

The City of Springfield, in an effort to increase its commitment to promoting the goal of fair housing, established an Affordable Housing Center in conjunction with the Community Partnership of the Ozarks (see attached diagram). It's located within the City's Government Plaza in a building leased for this purpose. The City is partly funding this facility with funds for staff intended to coordinate the building's use as well providing a yearly \$1 dollar lease.

The Center's purpose is to assist in providing housing for low-income households by reducing barriers to fair housing. The Community Partnership of the Ozarks' provides its services in 21 counties in Southwest Missouri for its stated purpose from their website is as follows:

For more than 21 years, Community Partnership has been a trusted leader, a catalyst for change, and a valued resource for solving issues in Springfield and the surrounding region. We are the "go to" organization when there is an emerging issue that needs to be addressed—we bring people together to discuss issues and then work together to create solutions.

Further,

Working in 21 counties in Southwest Missouri, we create opportunities for communication, cooperation, and collaboration, and reduce duplication by emphasizing the sharing of resources. Our diversity of programming and services—after school clubs and academic enrichment, parent involvement, early childhood, housing and homeless prevention, social work and crisis intervention, parent education, substance abuse and violence prevention, financial literacy, youth mentoring, and neighborhood revitalization—allow us to address community issues in a holistic manner.

As of the preparation of this document, the following agencies have relocated to, or opened ancillary offices in, the Center:

- One Door – central intake office for homeless.
- Springfield Community Land Trust – assists those seeking affordable home ownership opportunities.
- Springfield Housing Authority.
- Veterans Administration.
- Catholic Charities – Lists affordable housing opportunities in Greene, Christian and Webster Counties.

Other agencies will be added as space permits.

In addition to providing space for the agencies listed above, the fair housing center provides a tool lending library. To those households who may not be able to afford tools to perform housing maintenance and improvements, borrowing tools enables those households to perform improvements for a small fee.

E. Changes to Land Development Ordinances

Several changes to the Zoning Ordinance, discussed earlier in this Analysis, offer the ability to remove barriers which presented impediments to fair housing choice. They include: allowing reduced building setbacks; allowing existing residences in industrial districts to become conforming uses allowing them to be remodeled or expanded; allowing duplexes in apartment zoning districts allowing their wider use; and, reducing building setbacks between buildings on the same lot allowing the

potential for more housing. The changes previously discussed on the City's dangerous building ordinance will likely result in rehabilitated dwellings or vacant lots resulting in new housing to be built.

F. Increased Neighborhood Revitalization

Federal housing programs, including the Community Development Block Grant, HOME and Neighborhood Stability Programs, have allowed the construction of new housing or the rehabilitation of dilapidated or dysfunctional housing. These programs result in improved, efficient and safe housing for low and moderate income households which, in turn will result in increased revitalization of Springfield's neighborhoods.

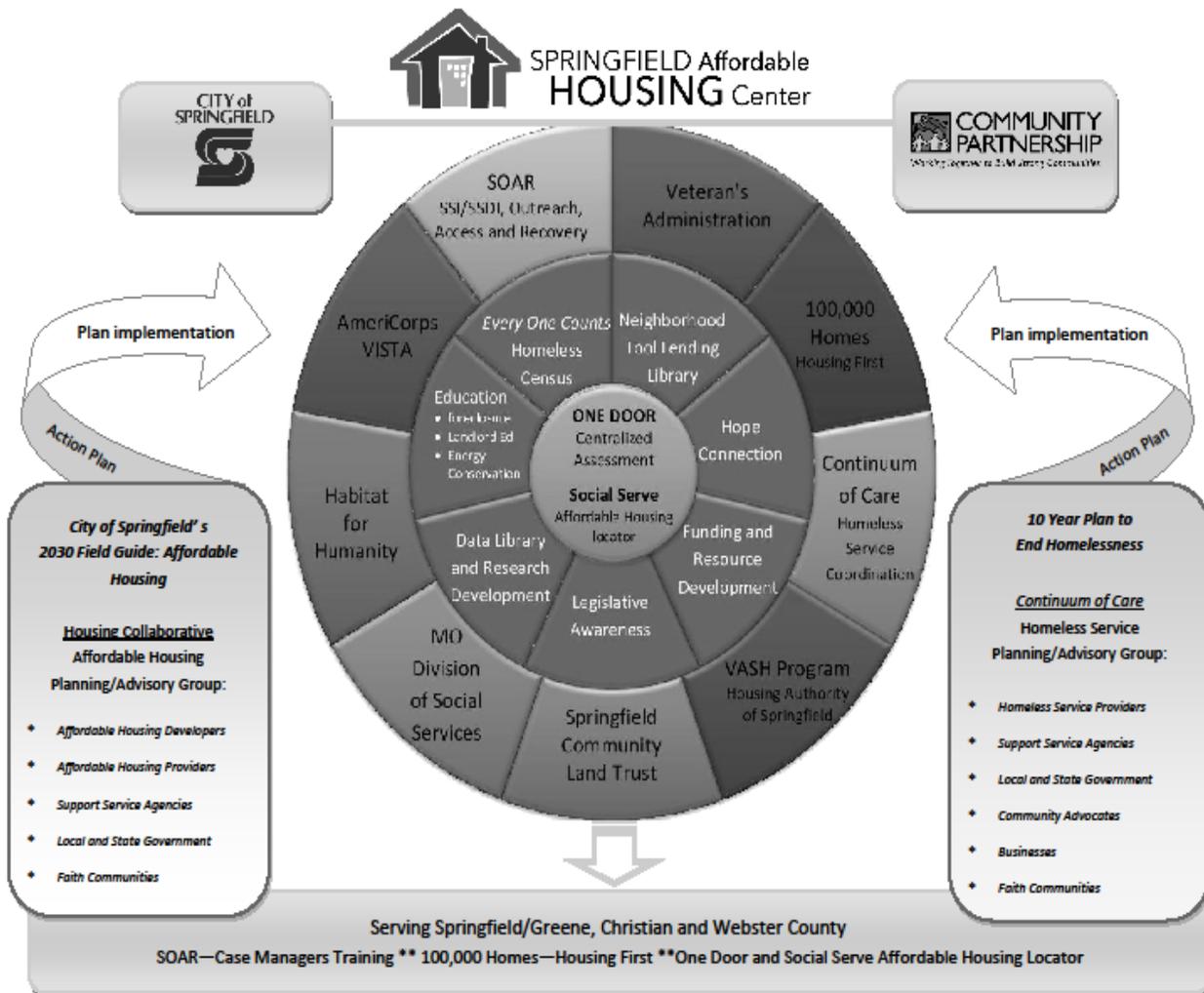
VI. ANALYSIS OF POSSIBLE CURRENT IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2006 Analysis of Impediments to Fair Housing Choice listed the impediments found during that analysis. For the most part, that report did not identify any impediments. The following list of possible impediments is from this current analysis.

A. Aging Population

There has been a gradual shift to a slightly older population in Springfield in the ten years ending in 2010 (Table 2). City trends follow those in the State of Missouri and the nation as the Baby Boomer age cohort ages. The city has experienced a lower percentage of those under 18 and a slight increase in those of age 62 or greater. These changes and a slight increase in the city's median age may signify the need for a different type of housing. By itself, however, an aging population doesn't qualify as an impediment to fair housing choice. The statistics shown by Zip Code (Table 3) may provide information to developers of specialty housing for the elderly or retired. Almost a quarter of the City's population is in the southeast and the median age of people east of Highway 65 is 47 years. Statistics for Center City (Zip Code 65806) shows it has the smallest percentage of people under 18 years and people 62 and over. This likely reflects the influx of college-aged and young professionals responding to downtown Springfield's resurgence and the lack of many families with younger children as occurs in the suburban areas.

Possible impediments to fair housing choice may appear when the aging population statistic is compared to other statistics from the Census. Thirty-seven percent of all Springfield households consisting of single person households are living alone, an increase of nearly 6% from 2000. The percentage of persons over the age of 65 living alone increased to almost 12% of the City's population in 2010, a slight increase of nearly 2%. Persons living alone may consider it an impediment to their choice of housing if they would prefer not to live alone or who cannot afford their dwelling. The number of housing units in the City with no bedrooms or one bedroom has increased by 21% since 2000. A direct relationship cannot be drawn between the numbers of single-person households and small housing units since it is possible the increase in small housing units is increasing to meet increased demand for smaller units. This may not be considered an impediment since the vacancy rate for rental housing nearly doubled by 2010 to over 13%.



B. Household Income

The percentage of households earning less than \$15,000 in Springfield increased in 2010 relative to that group's percentage in 2000. Almost a quarter of the population in 2010 is earning less than \$15,000, an increase of nearly 20%. Those earning between \$15,000 and \$50,000, saw a smaller percentage of households in 2010 than 2000 and a reduction in the number of households relative to all households in Springfield. Some of those leaving this middle grouping migrated downwards to those earning less than \$15,000 or migrated upwards to the group of households with incomes more than \$50,000.

Lower household income may be an impediment to the choice of fair housing as the number of housing choices and their locations diminish. The largest percentage of households with an income below poverty level is in Zip Code 65806. This area includes downtown and the Missouri State University campus. So, this group likely contains college students. Downtown's resurgence has seen a number of new market-rate apartment complexes built and the upper floors of existing retail establishments converted to housing. If this trend continues, it's very possible income will rise and housing value and property values and rent will increase for the next Census. This will increase the probability that impediments to fair housing choice will increase as housing will become even more expensive.

The locations of higher income households may result as an impediment to fair housing choice. As developers meet the expectations of households, they are likely to develop homes matching what is already constructed. So, the newer, higher priced housing will attract more of the same. Constructing higher priced, rather than lower, housing will limit the choices of those households whose income restrict them from purchasing more expensive housing.

C. Cost of Living

Springfield's low cost of living (Table 7) is good news for the City's residents when compared to the country as a whole. Costs for housing and utilities are especially low at 78.3% and 92.7% of the national average. In other words, the same house can be bought in Springfield, compared to the nation as a whole, for about 22% less while utility payments are cheaper than slightly more than 7% of the national average.

This good news is tempered by the fact that minimum wage earners have difficulty in keeping pace with increased housing prices and rents. Two minimum wage earners in a household will have a gross income slightly more than \$30,000. If 30% of a household's gross income is theoretically the threshold a household should pay for housing (according to U.S. HUD), this two-person household could afford up to \$754 monthly for a two-bedroom housing unit. HUD's Fair Market Rents indicate the maximum unit they could afford would have two bedrooms. A single-person household earning a minimum wage should be able afford a rent of half that amount or \$377 a month. This single person, however, could not afford either efficiency or a one-bedroom unit (Table 14). This is likely an impediment to fair housing choice since a dwelling unit with no bedrooms can be \$404, more than 30 percent of that person's income. To afford a market rate rental unit this individual would have to spend more than 30 percent of its gross income. The reality for many unskilled or low-income workers is that their wages often do not keep pace with the growth seen in overall area wage growth price of housing. This may be considered to be an impediment to fair housing choice.

D. Gentrification

As downtown improves, with its new housing, jobs and retail opportunities, some older housing units may be converted to newer units or will be demolished for redevelopment. The older units are often affordable while the newer units will often be fair market value. While gentrification is good for the community as a whole, it may be considered an impediment to fair housing choice as fewer less expensive housing units will be available in the Center City. Given the higher home values and rents paid in the other Zip Codes it will be difficult for low-income households to relocate in some areas outside of Center City.

E. Housing Discrimination Information and Reporting

Citizens may have difficulty obtaining information, or the understanding, they need on: what housing discrimination includes; how to file a complaint if discrimination is suspected; how the discrimination complaint process the MCHRRCR undertakes works to determine the validity of a complaint; and other issues. The MCHRRCR, as well as many of its sister agencies throughout the country, feel there are instances of housing discrimination which go unreported. This lack of information may be considered an impediment to fair housing choice.

F. Public Sector

Zoning ordinances, land use controls, building codes and development fees and charges are examples of public policies that may affect fair housing choice.

1. Zoning and Development Ordinances

Amendments to the zoning ordinance are continually approved by City Council. Some may result in an increase to the amount of affordable housing. Recent revisions which demonstrate this include: reducing front yard setbacks for single family homes in certain circumstances thereby allowing a potential for smaller lots; allowing passage of a conditional use permitting reduced front yard setbacks to do the same; allowing existing residences to become conforming uses in industrial districts thereby allowing them to be remodeled or expanded; allowing duplexes in apartment districts thereby permitting them in more areas of the city; and, reducing the minimum setbacks between apartment buildings within the same development thereby allowing more apartment units on the same property.

The City has taken an aggressive approach to substandard structures with its dangerous building ordinance. This results in dilapidated units being razed, with resulting additional lots for building, if the building will not be rehabilitated by its owner. This has had the most impact in typically older and more affordable neighborhoods and has reduced the blight caused by dilapidated structures. Many neighborhoods affected by these changes are within the program boundaries of the City loan program (see attached map). In addition to the resultant vacant lots that have been utilized for developers using the City loan programs, the structure and debt service of the loans make it practical for units in very poor condition to be razed, with reconstruction of a new affordable housing unit or another use depending upon the property's zoning.

The City's zoning ordinance and dangerous building ordinance are not likely to be impediments to fair housing choice. Future issues arising from problems with the City's zoning and development ordinances may be addressed at those times.

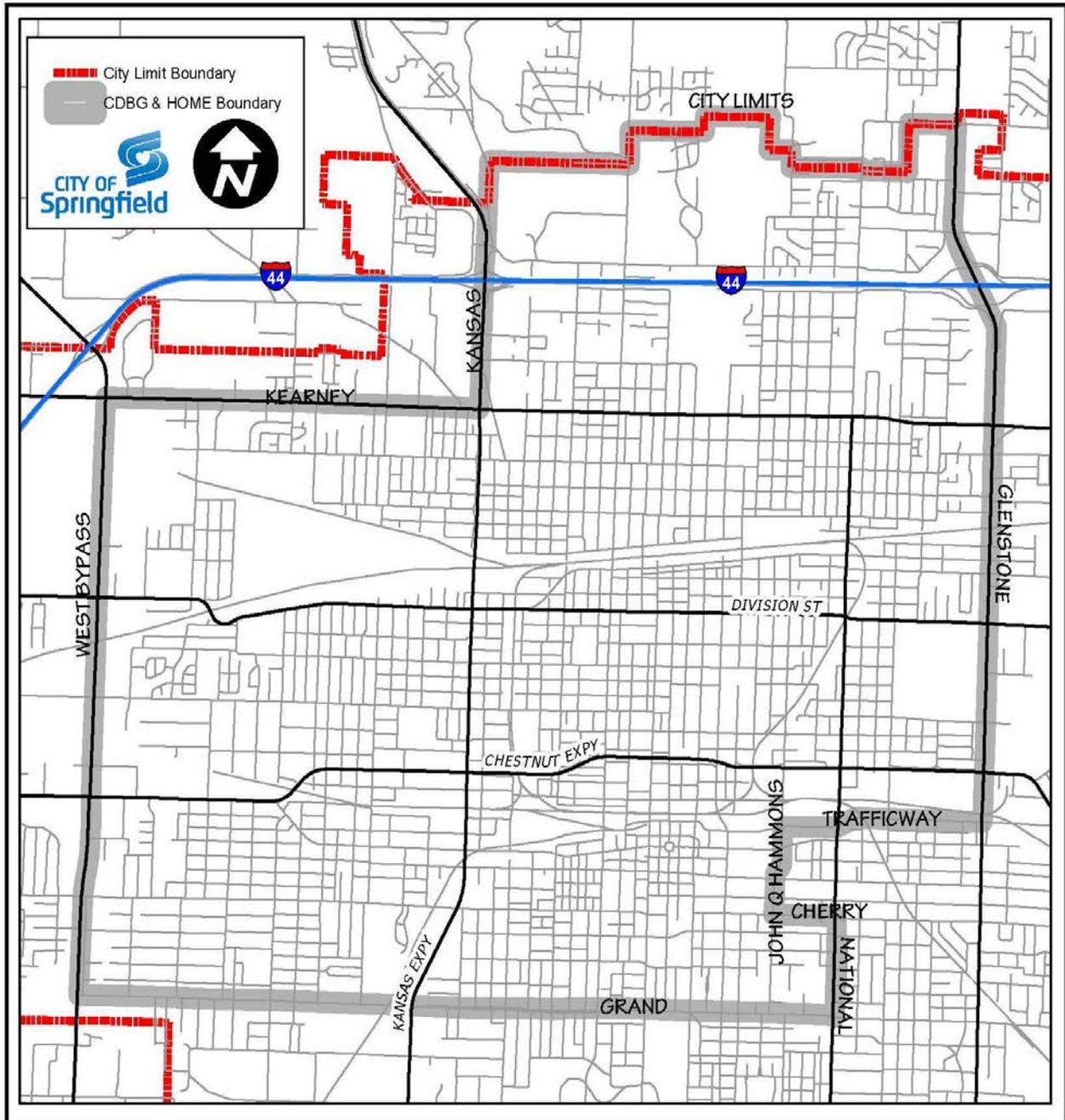
2. Neighborhood Revitalization

As previously noted, the City of Springfield has played an active role in neighborhood revitalization through participation in several housing programs. The City of Springfield has two principal components to increase the amount of affordable housing, the Community Development Block Grant (CDBG) Program and the HOME Investment Partnerships Program (HOME). These two grant programs are the funding mechanisms for the City's Comprehensive Housing Assistance Program. This program provides for housing loans within the City's target area (see attached program boundary map). CDBG principally funds homeowner rehabilitation while HOME principally funds rental housing rehabilitation and new construction of rental housing units.

The federal Neighborhood Stabilization Program (NSP) was initiated by the U.S. Department of Housing and Development (HUD) in 2008 for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. With the funds allocated to the City, 40 homes have been rehabilitated. Twenty were either rented or sold to households at 50% or below the area's median income. The other 20 are targeted to households at 120% of median income. The rehabilitations are considered major with new bathrooms and/or kitchens often added, roofs replaced, reorganized floor plans to make the house more functional, windows and doors, insulation, etc. to make the homes energy efficient. One organization receiving NSP funds approached households neighboring their own projects offering to make more minor repairs to their homes. While no hard evidence exists, anecdotal evidence shows groups of adjacent homes responding with improvements that revitalized the neighborhood.

The Ozarks Area Community Action Corporation (OACAC) has a long history of involvement in Springfield. Its energy assistance program has provided funds for improvements resulting in more energy efficient housing units. The Community Partnership of the Ozarks is active in coordinating numerous types of neighborhood initiatives including neighborhood clean-up programs and the Springfield Community Land Trust which provides affordable housing to qualified buyers.

Revitalization may affect property values and affordable housing in a negative way as well. The buying and renovation of houses and stores in deteriorated urban neighborhoods by upper- or middle-income families or individuals, thus improving property values but often displacing low-income families and small businesses is known as gentrification. While it's not known exactly why the 65806 Zip Code (the Center City area) has lost housing units in the 10 years between 2000 and 2010, it's very possible they have lost units due to the conversion or demolition of buildings which contained housing units into nonresidential uses.



3. Public Housing Authority (PHA) and Other Assisted Housing Choices

As noted earlier, The Housing Authority of Springfield (HAS) currently has 765 public housing units and 584 Section 8 certificates and vouchers. While some of the smaller units and apartments

have vacancies, there is always a long waiting list for the larger units and single-family homes. The lack of needed sized units may be considered impediments to fair housing choice.

The Housing Authority has partnered with various local agencies to address their common concerns of affordable housing. These organizations include The Kitchen, the Affordable Housing Action Board, and OACAC.

4. Property Tax Policies

Springfield has a property tax rate that is considered low in relation to most other communities. This is thought to have very little effect on development. Missouri has a property tax credit available to low income elderly homeowners. The credit is based on a sliding scale, with up to 30% of the property tax paid being available as a tax credit to the low-income elderly. There has been some discussion about the possibility of freezing property tax rates for elderly residents, but no legislative action to date.

5. Local Administrative Boards

The City of Springfield Planning and Zoning Commission has nine voluntary members who are appointed by City Council. As the composition of the board is dependent upon those who come forward to serve, minority members would have the opportunity to serve. The Springfield City Council has nine members who are elected to office. None are from minority populations. The MCHRCR recommends the city encourage the involvement of the classes protected by fair housing laws.

G. Private Sector

1. Lending Policies and Practices

The City of Springfield has provided seed money and formed a partnership with the Community Partnership of the Ozarks and Guaranty Bank to administer a special loan program to address home repair needs within the City's center city neighborhoods.

2. Real Estate Practices

Most real estate sales persons in Springfield are members of the Greater Springfield Board of Realtors. The affiliated National Association of Realtors strongly promotes fair housing. "NAR and the U.S. Department of Housing and Urban Development (HUD) have developed a model fair housing initiative to promote cooperation on fair housing issues between the real estate industry, fair housing groups, and government."

H. Public and Private Practices

1. Mayor's Commission on Human Rights and Community Relations

The Mayor's Commission on Human Rights and Community Relations (MCHRCR) was created by City Council in 1964. It's an advisory board which reports directly to them. The Commission's mission states: "The Mayor's Commission on Human Rights and Community Relations works to promote understanding and respect among all citizens and provides the community recourse for discriminatory acts. The Commission investigates alleged incidents of discrimination and tries to mediate settlements between affected parties. The Commission acts as a clearing house for information regarding Human Rights and offers its services to help educate interested citizens and community groups."

All alleged discrimination, including fair housing complaints, are documented and investigated by the Commission. The Commission's stated purpose is: "The purpose of the Human Rights Commission is to provide every person in Springfield, Missouri equal opportunities. Discrimination based on a

person's race, color, creed, religion, national origin, ancestry, disability, sex, or familial status in housing, is forbidden by law.”

The commission has not had a full-time staff since the recession led to its two staff members being laid off. The commission is now assisted by one part-time staff person within the Planning and Development Department. The work of the commission, including investigation of complaints of discrimination in housing, employment, and public facilities, is done by citizen volunteers. Under the ordinance, the commission dedicates a significant amount of time addressing discrimination in the community.

2. Fair Housing Plan

The City of Springfield has a Fair Housing Plan designed to promote equal housing access with regard to advertising, sale, rental, showing, leasing and financing of single-family homes, apartments and other residential dwelling units without discrimination based on race, color, religion, national origin, sex, disability or familial status. In administering the City of Springfield loan programs, the Planning and Development Department takes the added step of promoting fair housing with regard to all units, rather than only those with five or more units, the threshold required by Federal law.

3. Fair Housing Services

A variety of public, quasi-public and private organizations exist, in whole or in part, to provide services related to fair housing. These organizations should be monitored to ensure adequate services are provided and in the most cost-effective manner. It may be considered an impediment to fair housing choice if there is duplication of effort, services are too costly or the services do not result in an improvement in fair housing choice.

VII. COMMUNITY PARTICIPATION PROCESS

The process, statistics and findings in this analysis were reviewed in public meetings by two groups involved in promoting nondiscrimination in fair housing choice. The first, the Springfield Housing Collaborative, is part of the Community Partnership of the Ozarks. The mission of the Housing Collaborative is to “advance public knowledge on issues related to affordable housing and to create solutions through a collaborative, community-wide problem solving system ensuring safe, decent, affordable housing for elderly to youth, and homeless to homeowner”. The agencies making up the Housing Collaborative include members from:

- Legal Services of Southern Missouri
- University of Missouri Extension Office
- Consumer Credit Counseling Service
- Division of Mental Health – Springfield Regional Office
- Ozarks Area Community Action Corporation
- Guaranty Bank
- Habitat for Humanity
- AO Lakes/Missouri Career Center
- Housing Plus LLC
- Alternative Opportunities – Regional Partnership Grant
- The Kitchen, Inc.
- Church Army Christian County
- The Salvation Army
- Springfield Apartment & Housing Association
- Stone Soup Ministries
- Burrell Behavioral Health
- Southwest Center for Independent Living
- Housing Authority of Springfield
- Affordable Housing Action Board
- Veterans Administration – Mt. Vernon Outpatient Clinic
- Missouri Career Center
- Harbor House
- One Door
- UMOs
- Ozark Mountain Regional Health Care
- Home Builders Association of Greater Springfield
- NAMI of Southwest Missouri
- Catholic Charities of Southern Missouri
- AIDS Project of the Ozarks
- Missouri Housing Development Corporation
- Sigma House of Springfield, Inc.
- Springfield Victory Mission

- Southwest Missouri Office on Aging
- Affordable Homes Development Clinic
- Harmony House

The second group is the Mayor's Commission on Human Rights and Community Relations. It is made up of eleven individuals appointed by City Council who have various backgrounds and affiliations. The Commission voted to recommend City Council adopt this document. That vote included several recommendations for additions to this AI. One included a continuation of a recommendation from an previous AI to collect data on complaints pertaining to discrimination based on the basis of sexual preference and orientation which the Commission believes is underreported. A second recommendation included monitoring fair housing service providers to ensure their services are provided in the most effective means possible. A third addition is to provide better tenant education in the matter of housing discrimination. These recommendations are included in the body of this report.

Both the NAACP and Grupo Latino Americano were asked via email to provide comments or questions after reviewing this document. No comments or questions have been received to date.

VIII. CONCLUSION AND RECOMMENDATIONS

The City of Springfield has a long-standing commitment to promoting equal housing access without discrimination based on race, color, religion, national origin, sex, disability or familial status. The city's fair housing ordinance has been in place for many years.

The City of Springfield and its community partners continue to make progress in meeting identified needs in the betterment of fair housing choice. As the community and the factors that affect the need of its residents change, an ongoing analysis of fair housing trends and policies need to remain in place.

It's recommended this document be used as the basis for suggestions to address and mitigate impediments to fair housing choice in the upcoming Consolidated Plan and frequent updates are made to this document to understand the changing dynamics in Springfield's housing picture.