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City of Yuma, Arizona

# Analysis of Impediments to Fair Housing Choice

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# EXECUTIVE SUMMARY

## Analysis of Impediments to Fair Housing Choice

The Analysis of Impediments to Fair Housing Choice, or AI, is a planning process to facilitate meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. The obligation to affirmatively further fair housing (AFFH) applies to units of local government, counties, and states receiving HUD funds.

### Background

The Federal Fair Housing Act of 1968 requires the U.S. Department of Housing and Urban Development (HUD) to administer its programs and activities in a manner which “affirmatively furthers” the policies of the Federal Fair Housing Act (FFHA). This obligation extends to all federal agencies that administer housing and urban development programs, as well as subrecipients of those funds—including cities, counties, and states.

The method through which subrecipients demonstrate affirmatively further fair housing (AFFH) has changed significantly during the past decade. In 2016, HUD implemented a new rule that strengthened the reporting obligation (“Assessment of Fair Housing”). That rule was reversed in 2020, leaving recipients of federal housing and community development funds with a broad interpretation of how to demonstrate their obligation to AFFH.

This Executive Summary provides an overview of the fair housing landscape in the city and concludes with a detailed fair housing action plan. This analysis, and the actions that the city will undertake over the next five years, help fulfill the city’s obligation to AFFH.

**A note about COVID-19.** It is important to note that the resident survey, which provides a unique and current perspective on barriers to housing choice by different types of residents, was conducted during fall 2020. As such, the survey primarily reflects mid-pandemic economic impacts and seasonal economic conditions of year-round residents. The housing situation and needs of residents during that period can help inform short- and long-term policy responses to stabilize households and preserve and add to the supply of affordable housing.

### Primary Findings

The analyses of demographics and economic trends, public and private barriers to housing choice, disability and access, and fair housing environment, yielded the following primary findings for the City of Yuma.



## Demographic and economic profile.

- Since 2000, San Luis and Somerton have grown at a significantly faster pace than the city of Yuma, and now together account for over 20 percent of Yuma County's population. Demographic trends and growth in these heavily Hispanic jurisdictions have led to an increase in the share of the Hispanic population in the county, from 50 percent in 2000 to 65 percent in 2019.
- Yuma County experienced a decrease in the number of children under 17, and an increase in the number of residents ages 10 to 35, and ages 75 years and older over the last decade. These trends are reflected in changes in household types: The county has experienced a decrease in the share of married couples and increase in the share of non-family households, driven by an increase in residents over 65 living alone.
- Growth in renters far outpaced the increase in owners. The increase in renters was particularly high among households with annual income between \$75,000 to \$100,000, whose share of total renter households increased from 5 to 15 percent.
- A measure of segregation—the Dissimilarity Index, or DI—shows low levels of segregation for all groups in the City of Yuma and moderate levels of segregation for Hispanic and African American residents in Yuma County. However, segregation has increased since 2010 for all groups in the city and county.
- Yuma County residents rely heavily on their cars, and transportation costs make up a significant share of their household incomes: 93 percent of households in the city of Yuma have at least one vehicle per household and 85 percent travel to work by driving alone. The typical city of Yuma resident spends another 32 percent of their household income on housing, meaning the total housing and transportation costs for a typical city of Yuma household is 63 percent of income.

## Public and private barriers to housing choice.

**Publicly supported housing.** The Housing Authority of the City of Yuma (HACY) is the largest single operator of deeply affordable housing in the region. HACY owns and operates 231 units of public housing and administer 1,446 housing vouchers, most of which are choice-based (87 of the vouchers are project based—meaning they are used for specific units within a residential property).

The barriers to choice identified in the publicly supported housing analysis are largely market barriers:

- Racial and ethnic minority residents are overrepresented in publicly supported housing and the Housing Choice Voucher (HCV) program and families with children make up the majority of households on the waitlists for publicly subsidized housing. This signals that these populations are not adequately served by the private housing

market in the city. If HACY were not providing these households with support, they would likely be severely cost burdened.

- Even with public subsidies, HCV holders face significant barriers to finding housing. Most HCV recipients describe their experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.”

This is partially due to the Fair Market Rents (FMRs) that HUD uses to set the rental reimbursement; that rate is far below the market rent after considering utilities. Residents identified this as a barrier to entry to more modern apartment buildings and high opportunity neighborhoods.

There are a few improvements that HACY could make to further housing choice:

- There is a lack of information in the HACY’s administrative plan on accommodations for mental illness and behavioral challenges other than in the context of eligibility. More specific information about those accommodations would be helpful.
- HACY does not currently communicate with residents on their wait list via email, which may cause delays reaching prospective tenants who do not have regular access to a cell phone or a permanent address. This can pose a challenge as low income and precariously housed residents are most likely to experience housing instability and displacement and do not have a regular mailing address.

**Land use development and zoning regulations.** Land use and zoning regulations impact the built environment and ultimately determine development patterns and land uses in the city. Inclusive zoning regulations are vital to eliminating barriers to housing choice and affordability.

- Over the past two decades, building permits in the City of Yuma have been dominated by single family units; multifamily development has been very limited. Although single family units in the city are still relatively affordable to many, multifamily development is typically necessary to reach the deepest levels of affordability (e.g., the federal Low Income Housing Tax Credit program). Medium and low density housing are expected to make up the majority of future residential development in the city based on vacant land and existing zoning and multifamily housing is expected to make up 12 percent of future housing growth. The lack of opportunities to build multifamily housing could limit the opportunity to create affordable units, including deeply affordable units.
- The following recommendations for the City of Yuma are based on a review of the Zoning Ordinance against best practices to encourage inclusive housing development. The city should:
  - Revise the definition of “family” in the zoning code. At a minimum, allow up to six unrelated individuals to live together. A best practice is to not define

family through the zoning code to better facilitate inclusive housing arrangements, reflect changing preferences in sharing of residential units, and instead regulating through occupancy restrictions to prevent overcrowding.

- Include definitions of disabled and/or handicapped that are compliant with the FHAA.
  - Include ADA parking requirements in the zoning ordinance.
  - Allow compatible, community-based group homes by right in all residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.
  - Remove spacing requirements for group homes. Spacing requirements have been found by the courts to be a violation of the FHAA because of their effective limitations on housing choice for residents with a disability.
  - Embrace zoning best practices that facilitate a wide range of housing choices and opportunities in both lower density residential and higher density settings. Consider expanding the zone districts in which duplexes and townhomes are allowed and reduce minimum lot size requirements. Expand the use of mixed-use districts, compatible uses, and shared parking arrangements.
  - Allow land zoned for multifamily development by right to protect against a fair housing challenge related to the zoning review process—which can attract NIMBYism and bias to the zoning process.
  - Consider implementing Action Items from the General Plan Housing Element.
- The following recommendations for Yuma County are based on a review of the Zoning Ordinance and best practices to encourage inclusive housing development.
    - Include definitions of disabled and/or handicapped that are compliant with the FHAA.
    - Clarify the definition of “group homes” in the zoning ordinance. Currently both “group care facility” and “health and personal care facilities” may qualify as a group home. Providing clear requirements and regulations for group homes that do not differentiate based on the type of disability experienced by residents alleviates the potential for fair housing challenges.
    - Allow compatible, community-based group homes by right in residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.

- Encourage flexibility and nuance in parking requirements for multifamily developments based on unit mix and nearby community amenities—such as transit and employment centers.
- Implement the General Plan action item to examine increased density where appropriate in single family settings Consider expanding the zone districts in which duplexes and townhomes are allowed and allowing detached ADUs on lots with adequate size and configuration.
- Investigate the available land in the county that permits multifamily development by right and consider relaxing maximum density allowances for multifamily development in areas where infrastructure can support higher density development, as indicated in the County’s Housing Needs Assessment (2012)
- Implement action items from the county’s General Plan.

**Private sector actions.** Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. During 2019, households in Yuma County submitted 6,648 loan applications for home purchases, loan refinances and home improvements.

- The loan denial rate among American Indian or American Natives was 12 percentage points higher than for White applicants and the denial rate among black or African American applicants was 7 percentage points higher.
- The proportion of high-priced loans among Hispanic households is double the proportion for Non-Hispanics (22% compared to 11%). Similarly, in 2014, 14 percent of the loans were subprime, and there were more than twice as many subprime loans (211 loans) to Hispanic borrowers, compared with non-Hispanic borrowers (101 loans).
- From a policy perspective, these data suggest that Hispanic households in Yuma County may benefit from a range of mortgage loan and personal finance assistance to achieve lower priced loans.

### **Disability and access.**

- In 2019, 12 percent of residents in the City of Yuma were living with a disability—an estimated 11,244 residents. Residents living with a disability are likely to increase as the population ages, as will housing and service needs: Residents living with ambulatory and self-care difficulties need accessible housing units and/or reasonable modifications to age in the community.
- Residents with disabilities face many challenges to housing choice: they are disproportionately challenged by the lack of deeply affordable rentals due to their relatively low incomes leading to higher rates of housing instability (20% of residents

with disabilities v. 7% for all residents); are more likely to live in “doubled up” conditions (20% v. 12%); and more likely to live in housing in poor condition (29% v. 20%) and without needed accessibility features (28% of residents with disabilities).

- Most residents living with a disability do not participate in the labor force—and many want to but face significant barriers to employment access. Residents provided the following suggestions to improve employment outcomes for residents with disabilities: improving access to effective Vocational Rehabilitation, Employment Services, and other employment supports, expanding the number of businesses willing to hire residents with disabilities, transportation system improvements, and mental and behavioral health care services.
- Sidewalk improvements and access to effective public transportation are primary concerns for residents living with a disability in the region.

### **Enforcement and fair housing resources.**

- One in 25 (4%) survey respondents believe they experienced discrimination when looking for housing in Yuma County. Residents who identify with a racial group other than White and are non-Hispanic were most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic).
- Housing instability and displacement are most prevalent among low income households, Limited English Proficiency (LEP) households, non-Hispanic and non-White households, and households that include a member with a disability.
- In order to determine whether any of the jurisdiction’s minority groups appear underrepresented in the City of Yuma’s HUD-funded programs, Root analyzed CAPERs from the past three years (2017, 2018, 2019) and compared the race and ethnicity of beneficiaries to the overall city population. The review found that the City of Yuma is providing resources and services to populations who are typically vulnerable to discrimination and face barriers to fair housing choice.

### **Impediments and Fair Housing Action Plan**

This section outlines impediments to fair housing choice in the City of Yuma based on the analysis presented in the previous sections of this report including public and private barriers to housing choice, disability and access, and fair housing environment.

It is important to note that the City of Yuma has made great strides in expanding housing choice in the community and facilitating new residential development of a mixture of housing types since the last AI was conducted. Specifically,

- The city updated wastewater capacity charges to alleviate the cost burden on multifamily developers;

- The city provided significant funding for the rehabilitation of public housing; and
- The city reached a settlement with the residential developer Avenue 6E to rezone 360 acres of land and facilitate the construction of up to 1,800 affordable for sale units.
- The City Council approved an infill ordinance that modifies development standards for construction of housing in older, established neighborhoods. The ordinance provides flexibility in regulations regarding lot sizes, setbacks, lot coverage, and fees, to encourage housing development that is more affordable.
- The city has also made progress on many of the impediments identified in the previous AI. Outreach and educational campaigns about fair housing issues have ramped up in the City of Yuma, and partnerships to improve outcomes for residents have been implemented.

Fair housing areas for further investment include:

**Impediment No. 1. Persons with disabilities face barriers to housing choice.**

Consistent with the previous AI, community engagement identified barriers to housing choice for residents living with a disability including increased rates of perceived discrimination and housing instability, denials of requests for reasonable accommodations—particularly for service animals—and lack of infrastructure and supportive services to adequately serve this population.

**Impediment No. 2. Concentrations of poverty, racial and ethnic minorities, and poor housing quality persist.**

Racial and ethnic minority residents are overrepresented in publicly supported housing and the Housing Choice Voucher program, which signals that these populations are not adequately served by the private housing market in the city. Additionally, there are two census tracts within the City of Yuma that qualify as racially or ethnically concentrated areas of poverty and have high shares of the population using Housing Choice Vouchers. The resident survey identified low income households, housing subsidy recipients, and residents with a disability to be most likely to deem their home in fair/poor condition.

**Impediment No. 3. Access to homeownership is unequal among protected classes.**

Barriers to housing choice, particularly in accessing homeownership, could be interpreted as a potential fair housing barrier to ownership which disparately impacts people of color. Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. The loan denial rate among American Indian or American Natives was 12 percentage points higher than for White applicants and the denial rate among black or African American applicants was 7 percentage points higher. The proportion of high-priced loans among Hispanic households is double the proportion for Non-Hispanics (22% compared to 11%).

**Impediment No. 4. Residents find it difficult to use Housing Choice Vouchers in the region.**

Among the respondents with some type of housing subsidy, half (52%)

participate in the Section 8 voucher program. Among these residents, most describe their experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.” The most prevalent reasons tenants cited as difficult include:

- Not enough properties available,
- Voucher is not enough to cover the rent for places I want to live,
- Have a hard time finding information about landlords that accept Section 8,
- Not enough time to find a place to live before the voucher expires,
- Landlords have policies of not renting to voucher holders,
- Condition of housing does not pass Housing Quality Standards (HQS), and
- Vouchers require utilities be included in the rental rate.

**Impediment No. 5. Zoning and land use regulations could be improved to better facilitate housing choice.** The lack of “missing middle” housing—duplex, triplex, townhome products and accessory dwelling units being allowed throughout the city—creates a product bottleneck and keeps families who could own as renters.

Over the past two decades, housing development has been dominated by single family. Zoning and land use regulations in the city and especially the county limit the future multifamily and missing middle housing development potential and, as such, may create barriers to the construction of affordable housing. Section II provides detailed recommendations to ensure zoning and land use regulations promote inclusive development.

**Impediment No. 6. Discrimination in rental housing persists.** Fair housing testing by the Southwest Fair Housing Council indicates discrimination in rental housing transactions is prevalent in the City of Yuma. For more information about discrimination and enforcement under the FHAA see Section IV.

## **Fair Housing Action Plan**

The recommended fair housing action plan (FHAP) for the city follows. These action items focus on what the City of Yuma can reasonably do to address the impediments and affirmatively further fair housing (AFFH) given its staff and financial capacity. Other public entities, nonprofit, and private sector partners can play a role and buttress the city’s AFFH activities.

The action plan is contained in the matrix on the following page, which links the action items to the identified impediments, potential partners, timeline and outcomes.

**Figure ES-1.  
Fair Housing Action Plan**

#	Fair Housing Actions	Fair Housing Issues/Impediments	Responsible Party	Metrics and Milestones
1	<b>Maintain a regular 10-year schedule for updating the City of Yuma and Yuma County General Plans and corresponding zoning and land use regulations.</b>	Zoning and land use regulations limit housing choice, Access to homeownership is unequal among protected classes, Persons with disabilities face barriers to housing choice	City of Yuma and Yuma County	Consider the land use recommendations presented in the Public and Private Barriers to Fair Housing Choice section of this AI.  Based on a 10-year update schedule the City of Yuma and Yuma County are due for updates based on the following milestones: (last updated/update due) - City of Yuma 2012/2022 - Yuma County 2012/2022
2	<b>Collaborate with the Southwest Fair Housing Council to continue and expand fair housing testing efforts in the City of Yuma.</b>	Discrimination in rental housing persists	City of Yuma and Southwest Fair Housing Council	Develop a schedule for fair housing testing and reporting. File allegations of fair housing violations with HUD.
3	<b>Consider bridge financing or a utility fund to support residents with Housing Choice Vouchers in finding landlords to accept vouchers. Bridge financing or a utility fund could be used by voucher holders to guarantee utility payments to landlords who do not traditionally include utilities in rent.</b>	Residents find it difficult to use housing choice vouchers in the city	City of Yuma and HACY	Research best practices for implementation of bridge financing or utility funds in other communities. Identify potential funding sources for the program.
4	<b>Advocate for source of income protections in the state legislature and locally.</b>	Residents find it difficult to use housing choice vouchers in the city	City of Yuma, HACY, and Southwest Fair Housing Council	Support source of income protection legislation at the state level. Consider adopting source of income protections locally.



## Fair Housing Action Plan Continued

#	Fair Housing Actions	Fair Housing Issues/Impediments	Responsible Party	Metrics and Milestones
5	<b>Expand landlord training on fair housing issues and provide technical assistance in granting reasonable accommodations as well as funding for reasonable accommodations for residents living with a disability and the Housing Choice Voucher program.</b>	Residents find it difficult to use housing choice vouchers in the city, Persons with disabilities face barriers to housing choice	City of Yuma, HACY, and Southwest Fair Housing Council	Develop and deliver at least two technical assistance trainings for landlords per year. Focus topic areas on granting reasonable accommodations and the HCV program.
6	<b>Prioritize sidewalks and accessible infrastructure in the city's capital improvement plan to provide residents living with a disability equal access to opportunity in the community.</b>	Persons with disabilities face barriers to housing choice	City of Yuma	Evaluate areas of the city that require accessibility improvements, particularly sidewalks. Prioritize the improvement of accessible infrastructure in the CIP.
7	<b>Collaborate with partners to provide targeted homeownership programs including down payment assistance, financial literacy training, and actively discourage the use of predatory lending products, particularly among the most vulnerable populations in the community identified in this AI.</b>	Access to homeownership is unequal among protected classes	City of Yuma, HACY, and Southwest Fair Housing Council	Explore possible funding sources to determine the development of an affirmative marketing plan and plan to provide homeowner assistance with forms/applications targeting under-represented residents. Identify lead organizations to act as the host for financial literacy training and develop a suite of recourses that address the city's specific needs.
8	<b>Expand the geographic reach of the rental inspection programs to ensure the health, safety, and welfare of residents, particularly in low income areas. Institute a rental licensing program to collect data, enforce building code regulations, and maintain a regular inspection schedule. In tandem, provide increased technical assistance and funding for the rehabilitation of rental units in the city.</b>	Persons with disabilities face barriers to housing choice, Concentrations of poverty, racial and ethnic minorities, and poor housing quality persist, Residents find it difficult to use Housing Choice	City of Yuma and HACY	Leverage the existing rental inspection program to assess the potential for expansion into other low income areas. Research and consider developing a rental licensing program for all rental units. Develop technical assistance for landlords with the adoption of increased rental inspections and provide resources for rehabilitation of properties.

*SECTION I.*

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DEMOGRAPHIC AND ECONOMIC PROFILE

# SECTION I.

## Demographic and Economic Profile

This section provides an abbreviated, fair-housing focused version of the Demographic and Economic Profile prepared for the Housing Market Analysis and 2021-2015 Consolidated Plan. The discussion is organized around population levels and trends, income and poverty, segregation, and economic indicators.

### Primary Findings

- Since 2000, San Luis and Somerton have grown at a significantly faster pace than the city of Yuma, and now together account for over 20 percent of Yuma County's population. Demographic trends and growth in these heavily Hispanic jurisdictions have led to an increase in the share of the Hispanic population in the county, from 50 percent in 2000 to 65 percent in 2019.
- Yuma County experienced a decrease in the number of children under 17, and an increase in the number of residents ages 10 to 35, and ages 75 years and older over the last decade. These trends are reflected in changes in household types: The county has experienced a decrease in the share of married couples and increase in the share of non-family households, driven by an increase in residents over 65 living alone.
- Growth in renters far outpaced the increase in owners. The increase in renters was particularly high among households with annual income between \$75,000 to \$100,000, whose share of total renter households increased from 5 to 15 percent.
- A measure of segregation—the Dissimilarity Index, or DI—shows low levels of segregation for all groups in the City of Yuma and moderate levels of segregation for Hispanic and African American residents in Yuma County. However, segregation has increased since 2010 for all groups in the city and county.
- Yuma County residents rely heavily on their cars, and transportation costs make up a significant share of their household incomes: 93 percent of households in the city of Yuma have at least one vehicle per household and 85 percent travel to work by driving alone. The typical city of Yuma resident spends another 32 percent of their household income on housing, meaning the total housing and transportation costs for a typical city of Yuma household is 63 percent of income.

**Population.** Yuma County’s 2019 population estimate was 213,787. The county has added over 50,000 residents since 2000, an increase of 34 percent.

Figure I-1 shows population trends for Yuma County, the city of Yuma, three surrounding cities (San Luis, Somerton, and Wellton), and the State of Arizona. The city of Yuma has grown at a slower pace than all comparison jurisdictions and Yuma County overall, while San Luis and Somerton have more than doubled in size since 2000. Most of the city of Yuma’s population growth occurred between 2000 and 2010; the city has experienced much slower growth since 2010.

**Figure I-1.  
Population Trends, by Jurisdiction, 2000-2019**

	Total Population by Year				2000-2019 Change	
	2000	2010	2015	2019	Number	Percent
<b>City of Yuma</b>	77,545	93,064	97,950	98,296	20,751	27%
<b>San Luis</b>	15,322	25,505	34,001	37,990	22,668	148%
<b>Somerton</b>	7,266	14,287	15,759	17,698	10,432	144%
<b>Wellton</b>	1,829	2,882	3,101	3,254	1,425	78%
<b>Yuma County</b>	160,026	195,751	214,991	213,787	53,761	34%
<b>State of Arizona</b>	5,130,632	6,392,017	6,758,251	7,278,717	2,148,085	42%

Note: Arizona Office of Economic Opportunity data used for San Luis, Somerton, and Wellton.

Source: : 2000 and 2010 Decennial Census, 2019 1-year ACS, and Arizona Office of Economic Opportunity (OEO).

Rapid growth can complicate a jurisdiction’s eligibility for housing programs. Both single family home loans and multifamily loan guarantees provided through USDA Rural Development are targeted to cities with fewer than 35,000 people—a threshold that San Luis crossed between 2015 and 2019 . USDA Rural Development preservation grants are targeted at cities with fewer than 20,000, which Somerton will soon surpass if its rapid growth continues.

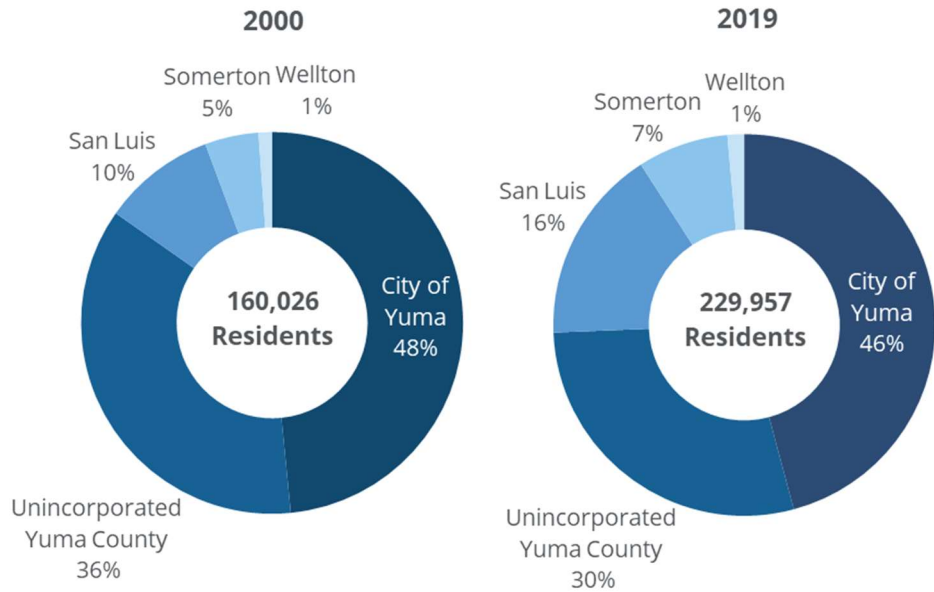
Figure I-2 shows the distribution of population in the county in 2000 and 2019. As the figure demonstrates, the most significant change was in the share of the county population living in San Luis, increasing from 10 percent to 16 percent. The share of the county’s population living in the city of Yuma and the unincorporated county declined, most significantly for the unincorporated county.

**Figure I-2.  
Distribution of  
Yuma County  
Population,  
2000 and 2019**

Note:

Data are different from previous table due to data source. OEO data used for comparisons across jurisdictions.

Source: 2000 Decennial Census, Arizona Office of Economic Opportunity (OEO)



**Unique demographics.** Yuma County and the city of Yuma have many unique demographic aspects that affect housing and community development needs, as well as the local economy. These include:

- Seasonal agricultural workers, some of whom live in the county and others who commute from Mexico;
- “Winter Visitors”—retirees who own second homes in Yuma and/or occupy recreational vehicle communities and parks during winter months and are permanent residents elsewhere; and
- Temporary and permanent residents employed by the Marine Corps at the Aviation Station/Training Facility (MCAS) and the Army Yuma Proving Ground;
- Students at public institutions of higher education including Arizona Western College, Northern Arizona University—Yuma and the University of Arizona—Yuma cooperative programs.

It is challenging to find data which accurately describe the effects of these demographic groups. The U.S. Census data from the region only includes residents who report their home as the city of Yuma or areas within Yuma County. As such, Census data will underrepresent the above groups and fail to account for population fluctuations related to growing operations, vacations, college enrollment and activities of military personnel (deployments, training operations).

Therefore, the Census data need to be paired with additional data for a complete picture of demographics in Yuma. Altogether, as demonstrated below, Yuma’s population increases by more than 20 percent during winter months primarily due to winter visitors and military training. Students may add another 10 percent.

**Agricultural workers.** Countywide, the Census reports that there are about 74,000 county residents employed, with more than 10 percent of these individuals, or 8,600, working in the agricultural industry. According to the 2017 USDA Census of Agriculture, there were 1,410 total migrant workers in Yuma County. These estimates are conservative and likely represent a lower bound. According to the Yuma Fresh Vegetable Association upwards of 20,000 field workers provide daily labor for the vegetable industry with many workers crossing the border from Mexico on a daily basis to work in the fields.

**Winter Visitors.** The Yuma Visitors Bureau reports that there are approximately 23,000 spots in RV parks and resorts. The vast majority of these spots are filled by part-time visitors, whose occupation generally peaks in January and February. Assuming 95 percent of the parks are occupied by part-time visitors, the city’s population could swell by as many as 22,000 people during these winter months.

**Students.** Arizona Western College (AWC) enrolls about 11,000<sup>1</sup> students. The college has on-campus housing, which can house about 300 students. As such, more than 10,500 students live off campus and commute. Recently, the AWC Housing Department had to take a building offline due to disrepair, that combined with COVID restrictions means AWC is currently only able to house around 100 students. Northern Arizona University—Yuma is an extension of the main campus in Flagstaff and is a small facility on the AWC campus, offering online as well as in-person courses.

**Military personnel.** According to the Yuma Visitors Bureau, about 14,000 come to Yuma at various times during the year for training exercises with the MCAS. Yuma Proving Grounds employs 3,000 people.

**Age.** As shown in Figure I-3, which presents the age distribution of Yuma County residents for 2010 and 2019, most age cohorts increased during that period of time, with the exception of school aged children between 5 and 17 years of age. Most age groups still account for roughly the same proportion of the population overall as they did in 2010. The groups with the fastest annual rate of growth are adults 65 and older (3.2%), followed by young adults aged 24 to 34 (2.4%).

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<sup>1</sup> <https://www.azwestern.edu/sites/default/files/awc/institutional-research/2018-2019%20Fact%20Book-Final%20Complete.pdf>

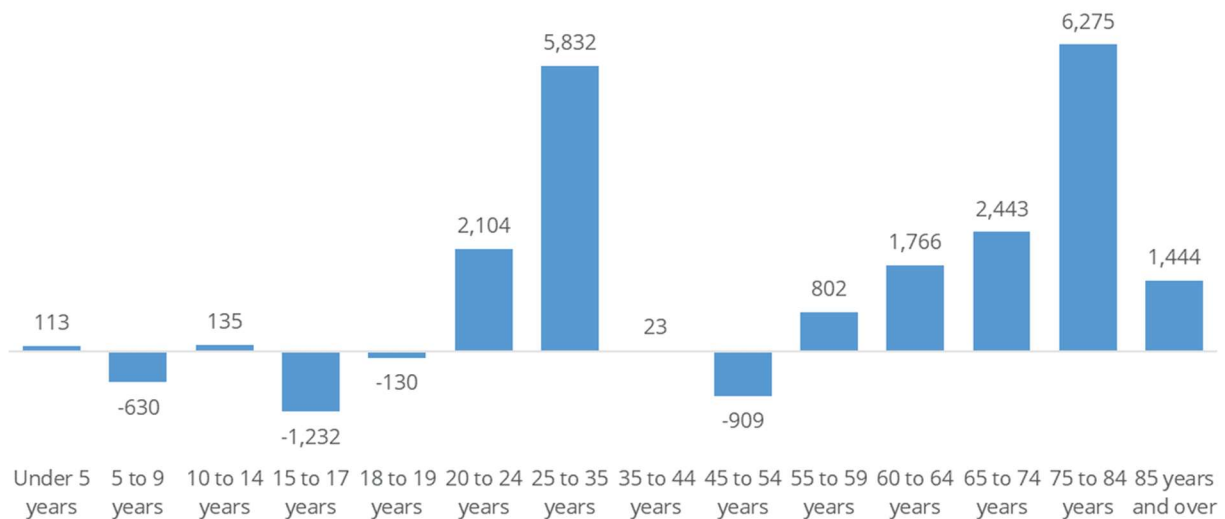
**Figure I-3.**  
**Age Trends, Yuma County, 2010 and 2019**

Age Cohort	2010		2019		Annual Growth Rate 2010-2019
	Number	Percent	Number	Percent	
Under 5 years	14,986	8%	15,099	7%	0.1%
5 to 17 years	40,199	21%	38,472	18%	-0.5%
18 to 24 years	21,155	11%	23,129	11%	1.0%
25 to 34 years	24,195	12%	30,027	14%	2.4%
35 to 44 years	22,944	12%	22,967	11%	0.0%
45 to 64 years	41,626	21%	43,285	20%	0.4%
65 and over	30,646	16%	40,808	19%	3.2%
<b>Total</b>	<b>195,751</b>	<b>100%</b>	<b>213,787</b>	<b>100%</b>	<b>1.0%</b>

Source: 2010 Census, 2019 1-year ACS, and Root Policy Research.

Figure I-4 presents the numerical change in residents by age group from 2010 to 2019. As shown, the largest numerical increase in population occurred in residents aged 75 to 84, followed by residents aged 25 to 35. The number of residents aged 5 to 9 and 15 to 19 as well as the number of adults aged 45 to 54 contracted since 2010.

**Figure I-4.**  
**Change in Population by Age, Yuma County, 2010 to 2019**



Source: 2010 U.S. Census, 2019 1-year ACS, and Root Policy Research.

**Migration patterns.** According to the 2020 United Van Lines Movers Study, Arizona continues to be among the top inbound states in the country. The top reason people moved to Arizona in 2020 was for a job, followed by family reasons. Almost two thirds of inbound movers make over \$100,000 and half are 55 and older.

Figure I-5 shows the distribution of in-migrants to Yuma County by age compared to the age distribution of current residents. According to estimates, around 16,000 people moved to the county in 2019. Persons moving to Yuma County are much more likely to be 75 years and older, slightly less likely to be between 25 and 34 years of age, and much less likely to be under 17 years of age. In recent years, the top places from which in-migrants originate include Maricopa County (AZ), Pima County (AZ), San Diego County (CA), and Central America.

**Figure I-5.**  
**Residents by Age Moving**  
**into Yuma County, 2019**

Note:  
 Population 1 year and over.

Source:  
 2019 1-year ACS, and Root Policy Research.

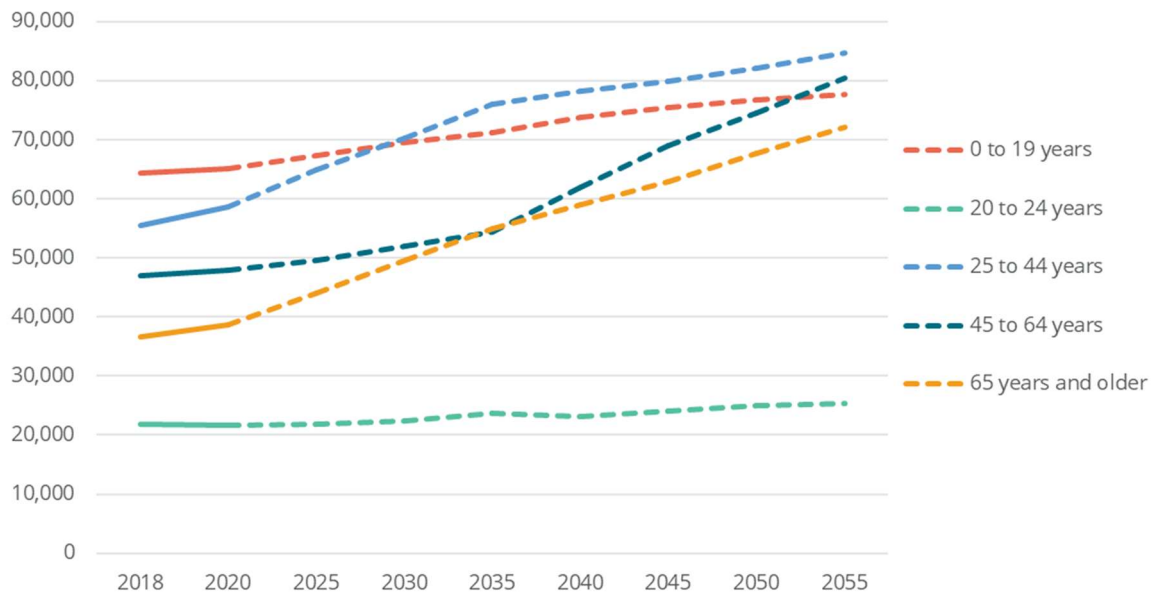
Age Cohort	Current Distribution	In-migrant Distribution
Under 17 years	25%	20%
18 to 24 years	11%	15%
25 to 34 years	14%	11%
35 to 64 years	31%	30%
65 years and over	18%	24%
75 years and over	9%	13%

**Projections.** The Arizona Office of Economic Opportunity provides population projections for Yuma County over the next 35 years. In 2055, the county is projected to have over 340,000 people, representing a 50 percent population increase from 2019.

Figure I-6 depicts population projections by age. The age group with the largest projected growth is adults over 65, who are expected to double. The age group with the smallest projected growth is adults between 20 to 24, who are expected to grow by less than 20 percent by 2055.



**Figure I-6.**  
**Population Projection by Age, Yuma County, 2018 to 2055**



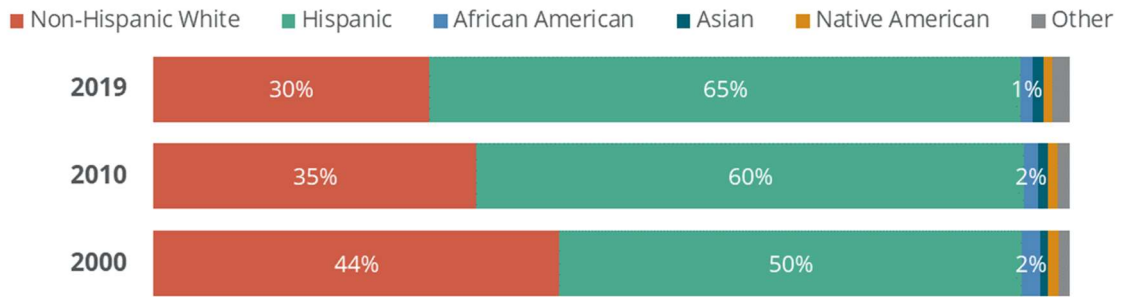
Source: Arizona Office of Economic Opportunity and Root Policy Research.

As the older resident population grows, accessible housing demand and needs will increase as age and disability are correlated. Seniors often require assistance with home maintenance and transportation to ensure they maintain a high quality of life while aging in place.

**Race and ethnicity.** Sixty-five percent of Yuma County residents identify as Hispanic; another 30 percent identify as non-Hispanic White, 1 percent as African American, 1 percent as Asian, and the remaining 2 percent belong to other minority groups. Figure I-7 presents the racial and ethnic composition of county residents and how the composition has changed since 2000.

The share of the population that identifies as non-Hispanic White has decreased since 2000 (44% compared to 30%). This decline has been offset by increases in the share of Hispanic residents (50% to 65%). The share of other racial groups has remained fairly stable.

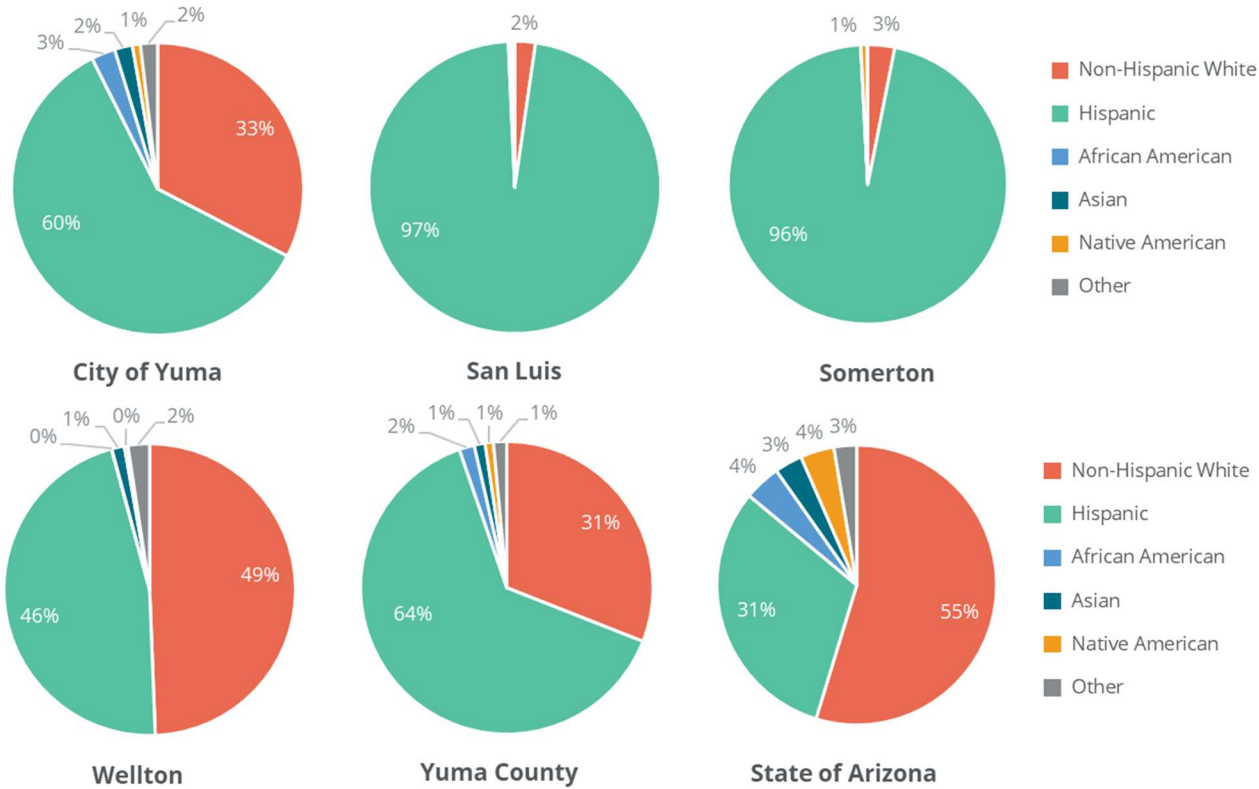
**Figure I-7.**  
**Race and Ethnicity, Yuma County, 2000, 2010, and 2019**



Source: 2000 and 2010 U.S. Census, 2019 1-year ACS, and Root Policy Research.

As shown in Figure I-8 below, communities in Yuma County skew heavily Hispanic compared to the State, this is particularly the case for agricultural communities San Luis and Somerton and less so for communities popular among retirees such as Wellton.

**Figure I-8.**  
**Race/Ethnicity Distribution, by Jurisdiction, 2019**



Source: 2019 5-year ACS, and Root Policy Research.

**Household composition.** Mirroring age distribution changes, Yuma County's household composition has somewhat changed since 2010, as shown in Figure I-9. The most notable changes include a decrease in the share of households with children, which fell from 35 to 24 percent, and of married couples, which decreased from 56 to 49 percent. The share of single person households over the age of 65 increased significantly, from 7 to 14 percent.

**Figure I-9.**  
**Household Composition, Yuma County, 2010 and 2019**

	2010		2019	
	Number	% Total Households	Number	% Total Households
<b>Total households</b>	<b>67,750</b>	<b>100%</b>	<b>74,042</b>	<b>100%</b>
<b>Married Couples</b>	37,731	56%	36,214	49%
<b>With children under 18</b>	15,199	22%	11,492	16%
<b>Without children under 18</b>	22,532	33%	24,722	33%
<b>Male householder, no spouse</b>	5,747	8%	4,658	6%
<b>With children under 18</b>	3,302	5%	1,222	2%
<b>Without children under 18</b>	2,445	4%	3,436	5%
<b>Female householder, no spouse</b>	8,312	12%	10,035	14%
<b>With children under 18</b>	5,395	8%	5,273	7%
<b>Without children under 18</b>	2,917	4%	4,762	6%
<b>Non-family households</b>	15,960	24%	23,135	31%
<b>Householder living alone less than 65</b>	6,998	10%	6,639	9%
<b>Householder living alone 65 years and over</b>	5,024	7%	10,009	14%
<b>Other Non-family households</b>	3,938	6%	6,487	9%

Source: 2010, and 2018 1-year ACS, Root Policy Research.

## Income and Poverty

This section examines household and family income in Yuma County, as well as the prevalence of poverty among the county's residents.

**Household income.** In 2019, the median household income in Yuma County was \$46,419, and the median income for families was \$51,480. Married-couples had the highest median income (\$59,489) while single mothers had the lowest median income (\$16,284—just 35% of the overall median income).

In the city of Yuma, the median household income was a slightly higher \$47,249 and the median income for families was \$54,543. Married-couples also had the highest median income (\$75,207) while single mothers had the lowest median income (\$17,383).

Median household income has increased at a much slower pace in the city of Yuma, which has seen an increase of 3 percent since 2010, compared to a 10 percent increase at the county level.

Figure I-10 shows income trends for the county since 2010 for both owners and renters. In Yuma County, the increase in renters far outpaced the increase in owners. The number of owner households increased from 48,719 to 49,099 while the number of renter households increased from 19,031 to 24,943.

The income distribution has changed for both. The share of owners with income above \$100,000 increased by 4 percentage points and was offset by a decline in lower and moderate income owners: The share of owners with incomes between \$25,000 and \$75,000 decreased by 6 percentage points. The share of owners with income below \$25,000 remained stable.

The share of renters earning over \$75,000 increased by 12 percentage points, and this increase was offset by the reduction in the share of lower income renters. Despite this shift, in 2019, Yuma County homeowners had household incomes around one third higher than renters (\$53,586 compared to \$32,499).

**Figure I-10.**  
**Income Trends by Tenure, Yuma County, 2010 and 2019**

	2010	2019	Change 2010-2019	
			Percentage Point Change	Numerical Change
<b>Owner median income</b>	<b>\$51,436</b>	<b>\$53,586</b>		<b>\$2,150</b>
<b>Income dsitribution</b>				
Less than \$25,000	21%	23%	1%	706
\$25,000-\$50,000	26%	23%	-3%	-1,292
\$50,000-\$75,000	24%	21%	-3%	-1,343
\$75,000-\$100,000	14%	15%	0%	295
\$100,000+	14%	18%	4%	2,014
<b>Total</b>	<b>100%</b>	<b>100%</b>		<b>380</b>
<b>Renter median income</b>	<b>\$27,111</b>	<b>\$32,499</b>		<b>\$5,388</b>
<b>Income distribution</b>				
Less than \$25,000	45%	36%	-9%	435
\$25,000-\$50,000	34%	30%	-4%	1,091
\$50,000-\$75,000	13%	15%	1%	1,123
\$75,000-\$100,000	5%	15%	10%	2,724
\$100,000+	3%	4%	2%	539
<b>Total</b>	<b>100%</b>	<b>100%</b>		<b>5,912</b>

Source: 2010, and 2019 1-year ACS, Root Policy Research.

**Poverty.** According to the U.S. Census, as of 2019, there were 18,469 residents living below the poverty level in the city of Yuma and 44,400 in the county. The poverty rate was 19.6 percent for the city and 21.4 percent for the county. This is considerably higher than the US poverty rate of 12.3 percent, and the State of Arizona poverty rate of 13.5 percent.

Figure I-11 shows the poverty rate for 2000, 2010, 2014, and 2019 for the county and cities. Data are based on 5-year averages, which are the only data available at smaller geographic levels. As such, the poverty numbers in this figure differ slightly from those reported for the city and county above (which are a one-year estimate).

The poverty rate in the city of Yuma and Yuma County has remained relatively stable since 2010, hovering around 20 percent. San Luis experienced a significant decrease in its poverty rate, from 35 percent in 2010 to 27 percent in 2019. Somerton's poverty rate increased between 2010 and 2014 but has sharply trended down afterward, while the poverty rate in Wellton shows the opposite pattern. It should be noted that data estimates for small communities such as Wellton have large margins of error.

**Figure I-11.**  
**Poverty Rate,**  
**Yuma County**  
**and Cities, 2000,**  
**2010, 2014, and**  
**2019**

Note:  
 2019 5-year ACS data used for San Luis, Somerton, and Wellton.

Source:  
 2000 and 2010 Decennial Census, 2014 5-year ACS, and 2019 1-year and 5-year ACS.

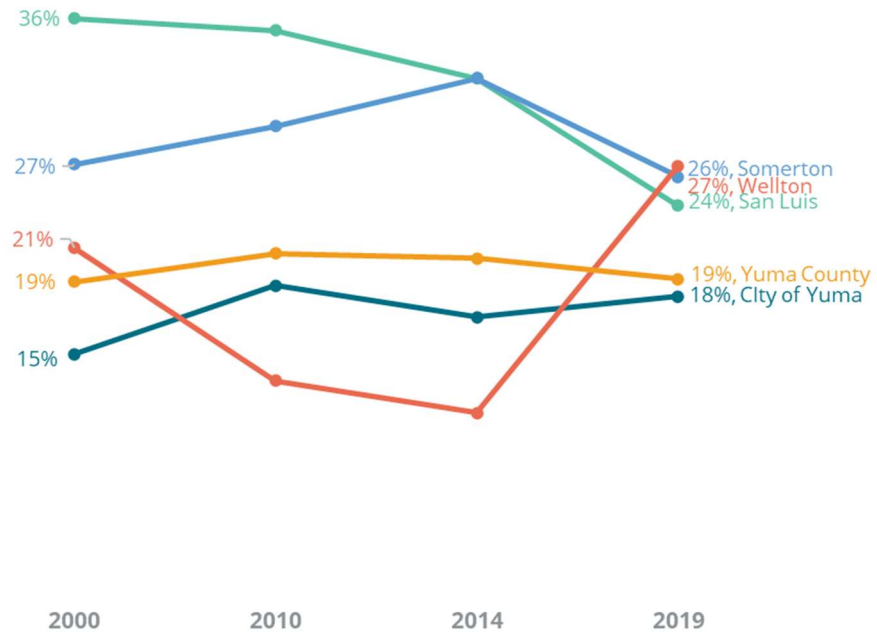
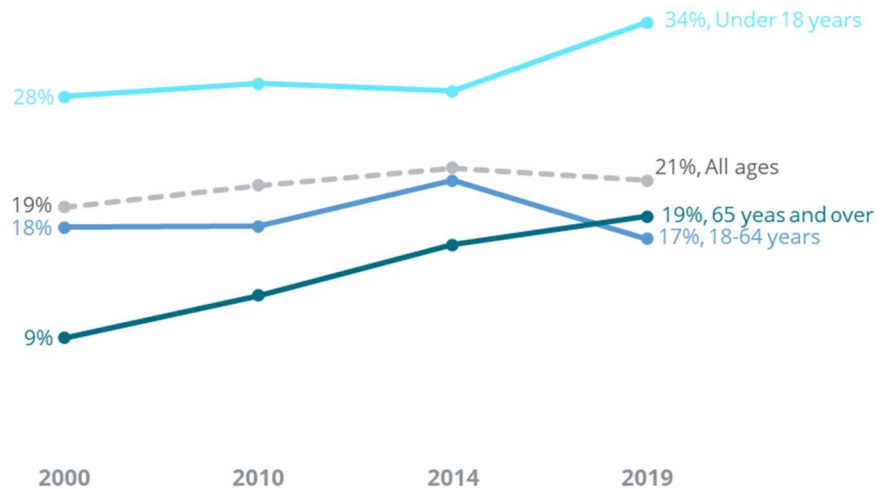


Figure I-12 shows the distribution of poverty by age for Yuma County. Since 2010, the percentage point increase in poverty has been largest for seniors (10 percentage points). The senior poverty rate remains fall below that of children, however: Children under 18 have the highest poverty rate at around one and half times the overall poverty rate.

**Figure I-12.  
Poverty Rate by  
Age, Yuma  
County, 2000,  
2010, 2014, and  
2019**

Source:

2000 Decennial Census, 2010  
1-year ACS, 2014 1-year ACS,  
2019 1-year ACS estimates.



## Segregation

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the historical racial and ethnic segregation, which often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A Census tract that has a non-White population of 50 percent or more, and
- A Census tract where the poverty rate is 40 percent or higher, or a tract with a poverty rate that is three times the average poverty rate for the metropolitan area, whichever is lower.

**Why R/ECAPs matter.** The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes “socially and economically dysfunctional.” Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.<sup>2</sup>

Households within R/ECAP tracts frequently represent the most disadvantaged households within a region and often face a multitude of housing challenges. By definition, a significant

<sup>2</sup> *The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.* In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities.* Washington, DC: Brookings Institution, 116–9.



number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. In addition to public subsidies, many need housing with supportive services, or larger units. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market.

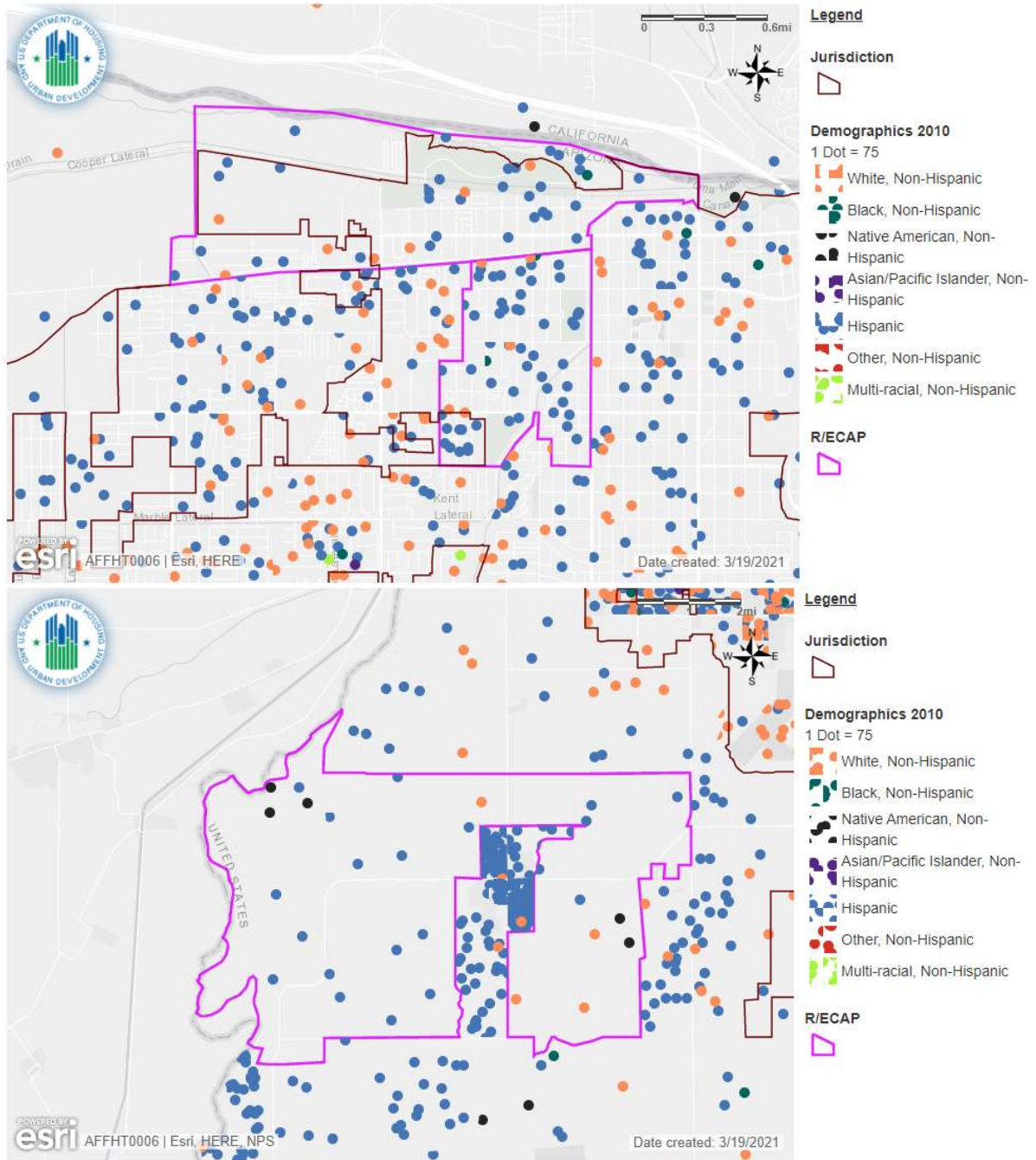
It is very important to note that many R/ECAPs, while not economically wealthy, are rich in culture, diversity, and community. The R/ECAP analysis is not meant to cast broad judgments on a neighborhood, but rather to identify areas where residents may have historically faced housing discrimination and continue to be challenged by limited economic opportunity.

There are three census tracts in Yuma County, two within the City of Yuma, that qualify as racially or ethnically concentrated areas of poverty. Figure I-13 provides maps that show the two R/ECAPs within the City of Yuma and race and ethnicity, followed by the R/ECAP in Yuma County.

**R/ECAPs in the City of Yuma.** The two census tracts within the City of Yuma are located near the northern border of the city and adjacent to the Historic downtown. The tracts are adjacent to the Colorado River and contain both wetlands park, manufactured homes, single story detached, and attached housing adjacent to the retail and commercial core and some industrial areas. The adjacency to downtown job opportunities, public amenities, and existing public transportation options via the Yuma County Intergovernmental Public Transportation Authority (YCAT) bus system which provides access to local and regional destinations. Additionally, the proximity to the Colorado River and recreational activities available in the riverside park.

**R/ECAP in Yuma County.** The R/ECAP in Yuma County is primarily rural farmland and the Cocopah Reservation. The Cocopah Reservation is a major community asset to the county. Established in 1917, the reservation spans 6,500 acres and is home to Cocopah Casino, Cocopah Resort and Conference Center, Cocopah Rio Colorado Golf Course, Cocopah Museum, Cocopah RV and Golf Resort, Cocopah Speedway and Wild River Family Entertainment Center. About 1,000 tribal members live and work on or near the reservation.

**Figure I-13.**  
**R/ECAPs and Race and Ethnicity**



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

**Dissimilarity index.** A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation.

The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation. The DI represents the percentage of a group’s population that would have to move for each area in the county/city to have the same percentage of that group as the county/city overall.

It is important to note that the DI is a broad index that is a starting point for understanding the magnitude of segregation. Like all indices, the DI has some weaknesses: First, the DI typically uses non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of non-Hispanic White residents.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Communities without much diversity typically have very low DI ratings, while counties with the most diversity will show high levels of dissimilarity. Thus, a “low” dissimilarity index for a jurisdiction is not always a positive if it indicates that racial and ethnic minorities face barriers to entry in a community.

Figure I-14 shows trends in the DI for the City of Yuma and Yuma County. In general, there is low levels of segregation in the City of Yuma. However, there is moderate segregation in the county for Black and Hispanic residents. While there is not currently high segregation in Yuma County, segregation has become more pronounced for all groups since 2010 and this trend should be closely monitored.

**Figure I-14.  
Dissimilarity Index, 2010  
and 2018**

Source: U.S. Census Bureau 2006-2010 and 2014-2018 American Community Survey 5-year estimates, and Root Policy Research.

	City of Yuma		Yuma County	
	2010	2018	2010	2018
<b>Non-White/White</b>	28	30	47	51
<b>Black/White</b>	24	33	36	43
<b>Hispanic/White</b>	30	32	50	52
<b>Asian/White</b>	23	29	31	37

	<b>0-39 Low Segregation</b>
	<b>40-54 Moderate Segregation</b>
	<b>55-100 High Segregation</b>

## Economic Profile

This section discusses key components of the county's economy, commute patterns, and transportation costs which relate to access to opportunity and employment.

**Job and wages by industry.** Figure I-15 compares Yuma County's job composition by industry for 2010 and 2019.<sup>3</sup> Yuma County continues to rely on service producing industries for the majority of its employment (73%) compared to goods producing industries (27%). Yuma County experienced growth in most job categories, with the exception of information (lost 95 jobs) and public administration (lost 222 jobs). The trade, transportation and utilities industry gained the most jobs (2,268) followed by education and health services industry (1,429), and leisure and hospitality (944). Growth on a percentage basis was strongest in manufacturing, which represents a small share of total employment, and financial activities, which provide a moderate level of employment.

**Figure I-15.**  
**Average Employment, Yuma County, 2010 and 2019**

	2010		2019		Percent Change 2010-2019
	Number	Percent	Number	Percent	
<b>Goods Producing</b>	16,585	28%	18,179	27%	10%
<b>Natural Resources and Mining</b>	12,396	21%	12,559	19%	1%
<b>Construction</b>	2,471	4%	3,021	5%	22%
<b>Manufacturing</b>	1,718	3%	2,598	4%	51%
<b>Service Providing</b>	43,075	72%	48,625	73%	13%
<b>Trade, Transportation and Utilities</b>	10,537	18%	12,805	19%	22%
<b>Information</b>	548	1%	453	1%	-17%
<b>Financial Activities</b>	1,433	2%	1,942	3%	36%
<b>Professional and Business Services</b>	5,703	10%	6,344	9%	11%
<b>Education and Health Services</b>	11,512	19%	12,941	19%	12%
<b>Leisure and Hospitality</b>	6,629	11%	7,573	11%	14%
<b>Public Administration</b>	5,532	9%	5,310	8%	-4%
<b>Other Services</b>	1,181	2%	1,257	2%	6%
<b>Total Employment</b>	59,660	100%	66,804	100%	12%

Source: Bureau of Labor Statistics, and Root Policy Research.

<sup>3</sup> The Bureau of Labor Statistics (BLS) does not provide industry employment data by city.

Figure I-16 below presents wage information by industry for jobs in Yuma County in 2010 and 2019. Public administration jobs pay the highest average wages, followed by education and health care services, and professional and business services. The lowest paid industries are leisure and hospitality and natural resources and mining.

The two lowest paid industries comprise 30 percent of employment in the county, the highest two comprise another 27 percent of employment.

**Figure I-16.**  
**Average Wages, Yuma County, 2010 and 2019**

	2010		2019		Percent Change 2010-2019
	Weekly Wages	Annual Total	Weekly Wages	Annual Total	
<b>Goods Producing</b>	\$503	\$26,156	\$686	\$35,672	36%
<b>Natural Resources and Mining</b>	\$460	\$23,920	\$634	\$32,968	38%
<b>Construction</b>	\$597	\$31,044	\$768	\$39,936	29%
<b>Manufacturing</b>	\$677	\$35,204	\$844	\$43,888	25%
<b>Service Providing</b>	\$561	\$29,171	\$690	\$35,902	23%
<b>Trade, Transportation and Utilities</b>	\$573	\$29,806	\$695	\$36,154	21%
<b>Information</b>	\$672	\$34,944	\$770	\$40,040	15%
<b>Financial Activities</b>	\$658	\$34,229	\$842	\$43,769	28%
<b>Professional and Business Services</b>	\$726	\$37,769	\$857	\$44,588	18%
<b>Education and Health Services</b>	\$726	\$37,762	\$915	\$47,565	26%
<b>Leisure and Hospitality</b>	\$322	\$16,768	\$403	\$20,967	25%
<b>Public Administration</b>	\$1,164	\$60,505	\$1,360	\$70,736	17%
<b>Other Services</b>	\$479	\$24,908	\$652	\$33,904	36%
<b>Total Employment</b>	\$644	\$33,488	\$796	\$41,376	24%

Source: Bureau of Labor Statistics, and Root Policy Research.

**Commuting patterns.** The Census’ Longitudinal Employer Household Dynamics (LEHD) program tracks commuting flows in/out of communities. In Yuma County there were 59,571 workers whose jobs are located in the county as of 2018, the latest data available. One fifth of those jobs were filled by in-commuters (10,846) and the other 80 percent by County residents (48,725).

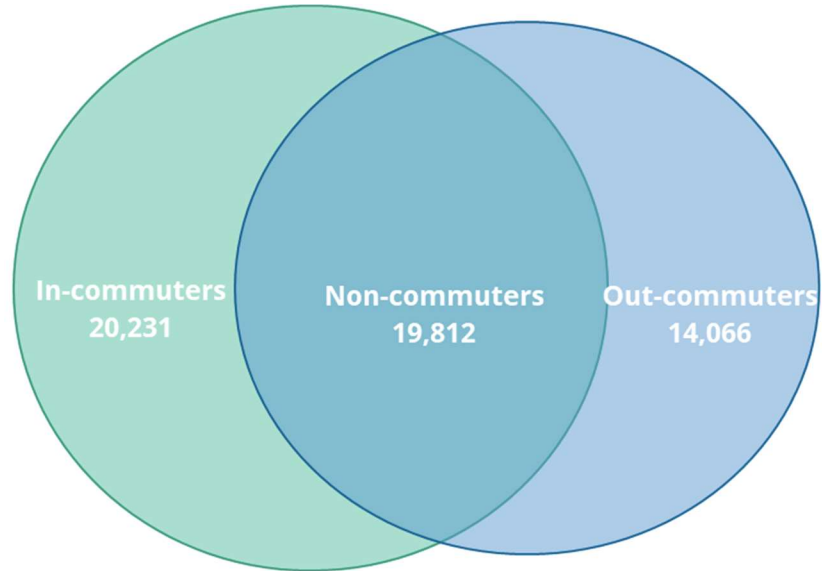
There were 40,043 workers whose jobs are located in the city of Yuma. Around half of those jobs are filled by in-commuters (20,231) and the other half by city of Yuma residents (19,812). Over half (59%) of the workers who live in the city of Yuma are non-commuters

while 14,066 city of Yuma residents commute to a job located outside the city of Yuma (41%).

Figure I-17 displays the inflow and outflow of jobs/workers to and from the city of Yuma.

**Figure I-17.**  
**Inflow and Outflow**  
**of Jobs, City of**  
**Yuma, 2018**

Source:  
US Census Bureau's Longitudinal  
Employer-Household Dynamics, and  
Root Policy Research.



The top daily destinations of out-commuters from the city of Yuma are Phoenix (14%), San Luis (8%), and Somerton (4%). In-commuters to the city of Yuma come from San Luis (15%), Fortuna (15%), and Somerton (5%).

Given the commuting patterns of neighboring communities—without-commuters representing between 80 and 90 percent of the local workforce in San Luis (79%), Somerton (91%), and Wellton (89%)— it is clear that the city of Yuma is an important employment hub for the county.

**Transportation costs.** According to the Center for Neighborhood Technology (CNT) Housing and Transportation (H+T) Affordability Index data, the typical Yuma County household spends 32 percent of their household income on transportation costs. The city of Yuma is similar in that the typical household spends 31 percent of their household income on transportation costs.

About three quarters of those transportation costs are related to auto ownership and the remaining one quarter is related to vehicle miles traveled. According to 2019 ACS data 93 percent of households in the city of Yuma have at least one vehicle per household and 85 percent travel to work by driving alone.

The typical city of Yuma resident spends another 32 percent of their household income on housing, meaning the total housing and transportation costs for a typical city of Yuma household is 63 percent of income.

*SECTION II.*

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PUBLIC AND PRIVATE BARRIERS TO HOUSING CHOICE



## Section II. Public and Private Barriers to Housing Choice

This section provides a review of public and private barriers to housing choice in the City of Yuma. It begins with an overview of publicly supported housing followed by a review of the policies and practices of the Housing Authority of the City of Yuma (HACY). Also provided in this section is a summary of the implications of zoning and land use regulations on fair housing—including relevant case law—a discussion of trends in development and the interrelatedness of land use regulations and a review of the zoning ordinances for both the City of Yuma and Yuma County. The section concludes with an analysis of private practices that influence housing choice, including mortgage loan decisions.

### Primary Findings

**Publicly supported housing and housing authority.** The Housing Authority of the City of Yuma (HACY) is the largest single operator of deeply affordable housing in the region. HACY owns and operates 231 units of public housing and administer 1,446 housing vouchers, most of which are choice-based (87 of the vouchers are project based—meaning they are used for specific units within a residential property).

The barriers to choice identified in the publicly supported housing analysis are largely market barriers:

- Racial and ethnic minority residents are overrepresented in publicly supported housing and the Housing Choice Voucher (HCV) program and families with children make up the majority of households on the waitlists for publicly subsidized housing. This signals that these populations are not adequately served by the private housing market in the city. If HACY were not providing these households with support, they would likely be severely cost burdened.
- Even with public subsidies, HCV holders face significant barriers to finding housing. Most HCV recipients describe their experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.”

This is partially due to the Fair Market Rents (FMRs) that HUD uses to set the rental reimbursement; that rate is far below the market rent after considering utilities. Residents identified this as a barrier to entry to more modern apartment buildings and high opportunity neighborhoods.

There are a few improvements that HACY could make to further housing choice:



- There is a lack of information in the HACY’s administrative plan on accommodations for mental illness and behavioral challenges other than in the context of eligibility. More specific information about those accommodations would be helpful.
- HACY does not currently communicate with residents on their wait list via email, which may cause delays reaching prospective tenants who do not have regular access to a cell phone or a permanent address. This can pose a challenge as low income and precariously housed residents are most likely to experience housing instability and displacement and do not have a regular mailing address.

**Land use development and zoning regulations.** Land use and zoning regulations impact the built environment and ultimately determine development patterns and land uses in the city. Inclusive zoning regulations are vital to eliminating barriers to housing choice and affordability.

- Over the past two decades, building permits in the City of Yuma have been dominated by single family units; multifamily development has been very limited. Although single family units in the city are still relatively affordable to many, multifamily development is typically necessary to reach the deepest levels of affordability (e.g., the federal Low Income Housing Tax Credit program). Medium and low density housing are expected to make up the majority of future residential development in the city based on vacant land and existing zoning and multifamily housing is expected to make up 12 percent of future housing growth. The lack of opportunities to build multifamily housing could limit the opportunity to create affordable units, including deeply affordable units.
- The following recommendations for the City of Yuma are based on a review of the Zoning Ordinance against best practices to encourage inclusive housing development. The city should:
  - Revise the definition of “family” in the zoning code. At a minimum, allow up to six unrelated individuals to live together. A best practice is to not define family through the zoning code to better facilitate inclusive housing arrangements, reflect changing preferences in sharing of residential units, and instead regulating through occupancy restrictions to prevent overcrowding.
  - Include definitions of disabled and/or handicapped that are compliant with the FHAA.
  - Include ADA parking requirements in the zoning ordinance.
  - Allow compatible, community-based group homes by right in all residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.

- Remove spacing requirements for group homes. Spacing requirements have been found by the courts to be a violation of the FHAA because of their effective limitations on housing choice for residents with a disability.
  - Embrace zoning best practices that facilitate a wide range of housing choices and opportunities in both lower density residential and higher density settings. Consider expanding the zone districts in which duplexes and townhomes are allowed and reduce minimum lot size requirements. Expand the use of mixed-use districts, compatible uses, and shared parking arrangements.
  - Allow land zoned for multifamily development by right to protect against a fair housing challenge related to the zoning review process—which can attract NIMBYism and bias to the zoning process.
  - Consider implementing Action Items from the General Plan Housing Element.
- The following recommendations for Yuma County are based on a review of the Zoning Ordinance and best practices to encourage inclusive housing development.
    - Include definitions of disabled and/or handicapped that are compliant with the FHAA.
    - Clarify the definition of “group homes” in the zoning ordinance. Currently both “group care facility” and “health and personal care facilities” may qualify as a group home. Providing clear requirements and regulations for group homes that do not differentiate based on the type of disability experienced by residents alleviates the potential for fair housing challenges.
    - Allow compatible, community-based group homes by right in residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.
    - Encourage flexibility and nuance in parking requirements for multifamily developments based on unit mix and nearby community amenities—such as transit and employment centers.
    - Implement the General Plan action item to examine increased density where appropriate in single family settings. Consider expanding the zone districts in which duplexes and townhomes are allowed and allowing detached ADUs on lots with adequate size and configuration.
    - Investigate the available land in the county that permits multifamily development by right and consider relaxing maximum density allowances for multifamily development in areas where infrastructure can support higher density development, as indicated in the County’s Housing Needs Assessment (2012)

- Implement action items from the county's General Plan.

**Private sector actions.** Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. During 2019, households in Yuma County submitted 6,648 loan applications for home purchases, loan refinances and home improvements.

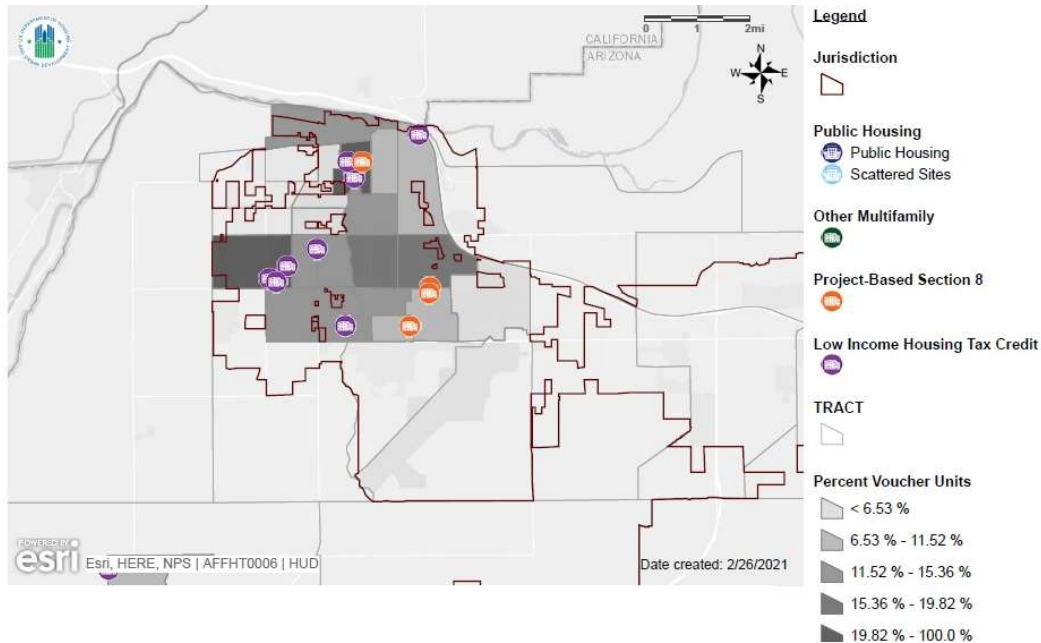
- The loan denial rate among American Indian or American Natives was 12 percentage points higher than for White applicants and the denial rate among black or African American applicants was 7 percentage points higher.
- The proportion of high-priced loans among Hispanic households is double the proportion for Non-Hispanics (22% compared to 11%). Similarly, in 2014, 14 percent of the loans were subprime, and there were more than twice as many subprime loans (211 loans) to Hispanic borrowers, compared with non-Hispanic borrowers (101 loans).
- From a policy perspective, these data suggest that Hispanic households in Yuma County may benefit from a range of mortgage loan and personal finance assistance to achieve lower priced loans.

## Publicly Supported Housing

This section provides an overview of publicly supported housing in Yuma County and the City of Yuma. According to HUD, there are 1,371 housing choice vouchers (HCV) in the City of Yuma and 192 project based vouchers. Overall, these subsidized units and vouchers make up around 4 percent of the city's housing inventory.

Focus group participants indicated that housing affordable to low income households is often in the least desirable parts of the city or county, with higher crime rates. This is particularly true in areas south of Mesa Heights. According to the HUD provided map shown below, there are two census tracts in the City of Yuma that have a concentration of voucher holders with more than one in five households in the tract using an HCV. These tracts are also the location of five LIHTC projects and one project based section 8 development.

**Figure II-1.  
Publicly Supported Housing and Housing Vouchers by Census Tract**



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

As shown in the figure below, the supply of publicly-supported housing is crucial for persons of color, who are more likely to occupy the units relative to their share of the household population in the region. Hispanic residents use 74 percent of all HCV issued in the City of Yuma yet make up 60 percent of the total population in the city. Similarly, in Yuma County, Hispanic households make up 98 percent of all public housing tenants. African American or Black residents are also overrepresented in publicly subsidized housing.

The overrepresentation is an indicator of residents of color having a difficult time finding private market housing they can afford or rent. According to the resident survey conducted for the AI, one in 25 (4%) survey respondents believe they experienced discrimination when looking for housing in Yuma County. Residents who identify with a racial group other than White and are non-Hispanic were most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic).

**Figure II-2.  
Publicly Supported  
Households by  
Race/Ethnicity**

Note:  
Numbers presented are percentages for  
households not individuals.

Source:  
2019 1-year ACS; Decennial Census; APSH; CHAS;  
Public Housing Authorities.

Housing Type	White	Black	Hispanic	Asian or Pacific Islander
<b>City of Yuma</b>				
Project-Based Section 8	51%	2%	45%	2%
HCV Program	18%	6%	74%	1%
Total households	45%	3%	49%	1%
Total households in City	33%	3%	60%	2%
<b>Yuma County</b>				
Public Housing	1%	1%	98%	0%
Project-Based Section 8	43%	1%	54%	1%
Other Multifamily	2%	0%	98%	0%
HCV Program	15%	5%	79%	0%
Total households	44%	2%	51%	1%
Total households in County	31%	2%	64%	1%

Figure II-3 shows the percent of residents living with a disability and households in publicly supported housing by disability status. Overall, the share of residents with a disability in publicly supported housing is in alignment with the total population in the area. However, residents living with a disability still face challenges accessing housing that suites their needs and can be afforded on a fixed income. These challenges are further discussed in Section III of this report.

**Figure II-3.  
Publicly Supported  
Households by Disability  
Status**

Note:  
Numbers presented are percentages for households not individuals.

Source:  
2019 1-year ACS; Decennial Census; APSH; CHAS; Public Housing Authorities.

Housing Type	With a Disability	Without a Disability
<b>City of Yuma</b>		
Project-Based Section 8	10%	90%
HCV Program	14%	86%
Total households in City	13%	87%
<b>Yuma County</b>		
Public Housing	6%	94%
Project-Based Section 8	9%	91%
Other Multifamily	0%	100%
HCV Program	13%	87%
Total households in County	13%	87%

**Public Housing Authority Policy Review**

HACY owns and operates 231 units of public housing and distributes 1,446 vouchers and 87 of the vouchers are project based—meaning they are used for specific units within a residential property. The waitlist for public housing is 947 applicants and for vouchers is 2,134 applicants—the majority of households on the waitlists are families with children.

The HACY runs a Family Self Sufficiency Program and Homeownership Program including down payment assistance. HACY states in their mission they are, "committed to providing decent, safe, affordable housing opportunities and efficient, professional, quality services that meet the needs of our residents and community."

HACY also has a relationship with the Arizona Housing Development Corporation (AHDC) which, "is a not-for-profit organization committed to promoting the general social welfare of the community through the development, renovation and/or provision of affordable, decent, safe, sanitary housing; organizational and property management services; consulting; training; resident services and community initiative programs that aid in fostering an improved quality of life."

**Policy and practices review.** This review of the Public Housing Authority (PHA) policies and practices was guided by HUD’s Fair Housing Planning Guide, Chapter 4, Section 4.3 and Chapter 5, Sections 5.2 and 5.4.

The results of the review are found below, which presents where potential fair housing barriers exist based on the findings from the policy analysis and program review. The review focused on how HACY could achieve the most inclusive tenancy patterns, while

respecting tenant preferences for location and unit type, and balancing needs with available resources.

## **1. Complying with Key Federal Regulations.**

*What is the PHA's policy for accommodating the needs of women who have experienced violence (Violence Against Women Act)?*

*What are the PHA's policies for considering and making reasonable accommodations? Does it balance the need for adequate information with resident rights to privacy?*

HACY includes policies related to the Violence Against Women Act (VAWA) in section 3-III.G. of their Administration Plan. The PHA follows VAWA language including policies related to definitions, documentation, confidentiality, and notification.

HACY adopts best practices and follows HUD and DOJ statements and guidance in reasonable accommodations. For example, HACY encourages requests in writing but will consider accommodation if not formal and will not retain medical records to demonstrate accommodation need in file. Finally, the PHA will accept verification of disability from non-medical professionals including a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability.

## **2. Evaluating Criminal Histories**

*What is the PHA's policy on considering tenants with criminal histories? [HUD has no formal policy on the length of look back periods, but recommends 5-7 years]*

HACY follows HUD criteria for criminal histories and includes a lookback period of 5 years. The PHA evaluates the use of illegal drugs and alcohol abuse as a pattern of behavior and accepts credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. HACY also seeks input from treatment providers or community-based organizations providing services to household members to make a determination.

## **3. Offering Mobility Counseling**

*What type of mobility counseling is offered? Does this include assisting home seekers understand the benefits of living in certain neighborhoods? Does the PHA help with the search process in any way?*

*How does the PHA monitor and manage concentrations of voucher holders in high poverty areas?*

HACY includes a goal to, “increase assisted housing choices by: providing voucher mobility counseling; conducting outreach efforts to potential voucher landlords; implementing homeownership voucher programs; and implementing a public housing or other homeownership program,” in their 2020 to 2025 five-year PHA plan. While it is unclear whether or not the HACY currently provides mobility counseling, it is one of their goals to provide mobility counseling to help increase assisted housing choices.

HACY offers an annual briefing for current and future landlords in which they get the opportunity to learn about fair housing, reasonable accommodations, tenant responsibilities, landlord responsibilities and HACY responsibilities. Additionally, HACY conducts outreach efforts to potential voucher landlords.

#### **4. Promoting Inclusive Tenancy**

*Does the PHA exhibit patterns of concentrations within developments?*

HUD tables show variation among resident race and ethnicity by development in some cases; however, overall dispersion is consistent across developments. Additionally, the PHA monitors the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

#### **5. Accommodating Regional Needs**

*How well do household compositions and wait lists reflect the needs of the broader region?*

Residents and voucher holders are more racially and ethnically diverse than the region overall. Additionally, families with children make up the majority of households on the waitlists.

#### **6. Preferences and Tenant Selection Policies**

*What types of preferences exist and do these reflect needs?*

*Are there any concerns with the Tenant Selection and Assignment Plan (TSAP)?*

*Do the preferences limit or discourage applicants from residing in all areas of the region?*

HACY offers preferences based on funding source including 15 family unification vouchers for youth aging out of foster care, 71 HUD-VASH vouchers for families referred by the Veterans Affairs Medical Center, and extremely-low income families on an as-needed basis to ensure the income targeting requirement is met. Otherwise, families are served on a first-come, first-served basis. There are no concerns with the TSAP or geographic limits on applicants.



## 7. Accommodating Needs in Applications

*How well does the process for applying for public housing or Housing Choice Vouchers (HCV) accommodate the needs of Limited English Populations, residents with special needs, and residents with disabilities?*

The housing authority takes a variety of steps to ensure accessibility to groups who may have difficulty with the standard application process including people with disabilities, seniors, and persons with limited English proficiency. All application materials are available in English and Spanish on the HACY website and the housing authority offers alternative communication for residents with hearing or vision impairments including, but not limited to, TTY, large print, visual aids, one-on-one assistance, oral explanation, interpretation, sign language interpretation, etc.

## 8. Accommodating the Needs of Residents with Disabilities

*How are accessible units made available?*

*Does the PHA promote the availability of accessible housing units to voucher holders?*

*How are residents with mental illness and behavioral and cognitive challenges accommodated?*

Newly-constructed buildings must comply with accessibility standards for residents with a disability and alterations to existing facilities must be made as a reasonable accommodation. When issuing a voucher to a family that includes an individual with disabilities, the HACY will include a current list of available accessible units known to the housing authority and will assist the family in locating an available accessible unit, if necessary. Selection preferences are provided when required by the regulation for mobility impaired persons for accessible units. If a non-disabled person is occupying an accessible unit, that person may be moved if an accessible unit is needed. Little information on accommodation for mental illness and behavioral challenges—other than in the context of eligibility.

**Themes and potential issues.** The review of PHA policies in prior pages revealed several areas that could directly or indirectly limit housing choice:

- Racial and ethnic minority residents are overrepresented in publicly supported housing and the Housing Choice Voucher program, and families with children make up the majority of households on the waitlists for publicly subsidized housing. This signals that these populations are not adequately served by the private housing market in the city. If HACY were not providing these households with support, they would likely be severely cost burdened.

- There is inadequate information in the HACY’s administrative plan on accommodations for mental illness and behavioral challenges—other than in the context of eligibility.

Challenges identified by the PHAs in the interviews conducted for this AI include:

- HACY does not currently communicate with wait list residents via email. This can pose a challenge for residents who are precariously housed and change their mailing address frequently.

Additional challenges were identified by residents participating in community engagement for the AI:

- Renters who participated in focus groups described living in housing in fair or poor condition, including those with housing vouchers.
- Among the respondents with some type of housing subsidy, half (52%) participate in the Section 8 voucher program. Among these residents, most describe their experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.”
  - Nearly all attributed their difficulty to “not enough properties available” and half reported that the “voucher is not enough to cover the rent for places I want to live.”
  - About two in five “have a hard time finding information about landlords that accept Section 8” and three in 10 say there is “not enough time to find a place to live before the voucher expires.”
  - About one in five report “landlords have policies of not renting to voucher holders,” and that the “condition of housing does not pass Housing Quality Standards (HQS).”
- In a focus group with residents with disabilities, participants explained that their voucher requires them to rent units with utilities included in the rent (a HUD requirement). In their experience, only smaller landlords that own old apartment buildings offer utilities included with the rent, and these units are clustered in the older part of town, limiting the neighborhoods where these voucher program participants can live. As such, participants expressed a desire for more rentals in better neighborhoods or more modern buildings to include utilities.

## Why Zoning Matters

This section examines the link between housing choice and zoning and land use regulations. It begins with background on how zoning and land use decisions influence housing choice; provides recent development trends; summarizes the zoning and land use

findings from previous AIs; examines how current zoning and land use regulations and decisions affect housing choice; and concludes with findings.

As housing affordability challenges have grown into what many are calling a national housing crisis—exacerbated with the current pandemic—zoning and land use regulations have received more attention for their role in creating barriers to housing choice and failing to respond to housing market needs.

In 1917, the U.S. Supreme Court made racial zoning illegal by overturning a racial zoning ordinance in Louisville, Kentucky (*Buchanan v. Warley*) on the grounds that it violated “freedom of contract” protections. However, many cities ignored the Supreme Court’s decision and continued racial zoning practices or found other legally permissible ways to regulate neighborhood composition. The Avenue 6E Investments LLC v. the City of Yuma case in 2015 arose because the city denied a rezoning request to allow for smaller, more affordable homes next to an expensive neighborhood. Although race or ethnicity were never explicitly used to deny the development, the outcome had a disparate impact on Hispanic families and code words such as increased crime and the purchase of homes by single parents were used to oppose the development.

When the City of Yuma offered to provide an alternative site for the new development the court responded by saying that, “[t]ruly comparable housing... is not simply a question of price and model, but also of the factors that determine the desirability of particular locations—factors such as similarly or better performing schools, comparable infrastructure, convenience of public transportation, availability of amenities such as public parks and community athletic facilities, access to grocery or drug stores, as well as equal or lower crime levels.”<sup>1</sup>

Another early practice that facilitated segregated communities was zoning based on use, also called “Euclidean” zoning, named for Euclid, Ohio. This type of zoning, which remains common today, divides land use by housing type, commercial/retail/industrial use, and height—with the primary objective to protect occupants of single family detached housing from other uses and housing types believed to compromise health and safety. In 1926, the U.S. Supreme Court found that Euclid’s zoning ordinance was allowed as part of the jurisdiction’s police power—and, in through decision, promulgated the belief that segregating single family detached homes was necessary to “increase the safety and security of home life...prevent street accidents, especially to children...preserve a more favorable environment in which to rear children, etc.”<sup>2</sup>

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<sup>1</sup> <https://www.epi.org/blog/housing-segregation-undergirds-the-nations-racial-inequities/>

<sup>2</sup> *Modern Family: Zoning and the Non-Nuclear Living Arrangement*, [https://planning-org-uploaded-media.s3.amazonaws.com/publication/download\\_pdf/Zoning-Practice-2020-05.pdf](https://planning-org-uploaded-media.s3.amazonaws.com/publication/download_pdf/Zoning-Practice-2020-05.pdf)

The above exclusionary zoning practices facilitated segregation. They also drove excluded residents—largely people of color—into neighborhoods with higher levels of pollutants, poor quality housing, and limited ownership opportunities.

**Exclusionary zoning today.** Zoning regulations no longer dictate where certain types of people may live other than in special circumstances like senior living communities, which are allowed under the Federal Fair Housing Act (FFHA). Zoning today regulates the structural environment. Depending on the code, that means where residential development is allowed, the types of residential development allowed (e.g., single family and multifamily), the density of development, and the form or design of development. Communities rely on zoning and land use to define their character, and this typically takes precedence over expanding housing choice.

This can have the same effect as regulating the residences of people, however, due to income disparities of protected classes. In the City of Yuma, this occurs mostly for African American/Black households, Latino/Hispanic households, persons with disabilities, and single mother households. Residential zoning that limits the placement of housing these resident groups can afford can mimic past discriminatory zoning practices.

Exclusionary zoning generally employs land use regulations to develop housing for an idealized segment of the population—typically a married couple with children living in a suburban single family detached home. In many cases a version of this definition of the idealized family is still present in zoning ordinance definitions.

Public costs associated with exclusionary zoning include increased traffic congestion, persistent inter-generational poverty, and stunted economic growth. Exclusionary zoning increases the cost of entry into service-rich neighborhoods which often contain the highest-performing school districts, the best access to high-paying jobs, access to healthy food, and transportation alternatives. In this way, segregation is reinforced by limiting opportunities for low- and moderate-income residents to live in areas of opportunity.

There is no one, agreed-upon, definition of exclusionary zoning, just as there is no magic set of zoning regulations that produce perfect inclusivity of housing choice and access to opportunity. Yet some practices are better than others, and some practices are so exclusive they have been found to be illegal. The courts have effectively determined what constitutes exclusionary behavior in zoning and land use regulations and decisions.

Land use planning that embraces housing inclusivity is becoming more popular as communities recognize—and internalize—the public costs associated with exclusionary zoning. Inclusive planning is also being embraced to respond to market demand, recognizing that how people choose to live—e.g., renting longer, living in low maintenance homes—is changing.

Notable exclusionary zoning legal cases include:

**Berenson v. Town of New Castle** (1975) was an early case, stemming from a developer who wanted to build a condominium community and was denied due to lack of zoning for multifamily housing. This case introduced the idea that housing choice should be considered in zoning decisions. The court's decision was based on the premise that the "primary goal of a zoning ordinance must be to provide for the development of a balanced, cohesive community which will make efficient use of the town's land.... [I]n enacting a zoning ordinance, consideration must be given to regional [housing] needs and requirements.... There must be a balancing of the local desire to maintain the status quo within the community and the greater public interest that regional needs be met."<sup>3</sup>

**NAACP v. Town of Huntington** (1988) resulted in a court-ordered rezoning of a parcel of land to accommodate multifamily development and a change in the town's zoning ordinance which only allowed multifamily development in an urban renewal area. The court concluded that the failure of the town to rezone a parcel to accommodate multifamily development has a "substantial adverse impact on minorities." This was based on an analysis of housing needs data that found a disproportionate proportion of African American families had housing needs.

Under Huntington, a zoning code is presumptively exclusionary if it: (1) restricts multifamily or two-family housing to districts/neighborhoods with disproportionately large minority populations; or (2) disparately impacts minorities by restricting the development of housing types disproportionately used by minority residents.<sup>4</sup>

**Common regulatory barriers.** Some of the key factors in land development codes that most commonly result in barriers to fair housing choice and reasonable accommodation for persons with disabilities include:

- **Site standards.** Large lots, minimum unit sizes, or excessive setbacks between structures or from streets that can increase development costs, e.g., special infrastructure;
- **Limits on density.** Restriction on or prohibition of multifamily housing; low floor area ratios (FAR) for multifamily or mixed-use development; or low density requirements;
- **Use-specific standards.** Special site or operational requirements for group homes for persons with disabilities that are not required for other residences or groups;
- **Differences in quality and access to public services.** Additional requirements for specific developments (e.g., group homes or multifamily) to provide infrastructure or essential municipal services not required for other residences or dwelling units;

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<sup>3</sup> N.J. Stat. Ann. Sections 52:27D-301 et seq. (2007).

<sup>4</sup> Huntington Branch, NAACP v. Town of Huntington, 844 F.2d 926 (2d Cir. 1988)

- **Definition of family and occupancy restrictions.** Definitions of family or occupancy limits that prohibit or limit the number of unrelated persons in a household;
- **Procedures for development or rezone reviews.** Extensive review procedures, public hearings, or notice requirements for different housing types, housing for protected classes, or low-income housing;
- **Housing types.** Limits or prohibitions on alternative affordable housing options such as accessory dwelling units (ADUs), modular or manufactured homes, and mixed-use developments;
- **Spacing.** Minimum distance between group homes that are not required for other residences or groups and make development of group homes difficult;
- **Reasonable accommodations.** Regulations inhibiting modifications to housing for persons with disabilities or their ability to locate in certain neighborhoods; and
- **Code language.** Local land development codes and standards that are not aligned with federal and state regulations governing fair housing and reasonable accommodation.

**Zoning best practices.** Recognizing the exclusionary nature of zoning ordinances, and to respond to the housing crisis, cities and counties are increasingly modifying land use codes to allow “gentle infill”—duplexes/triplexes, rowhomes, and Accessory Dwelling Units (ADUs)—in single family zones. Some jurisdictions are adopting “lifestyle neutral” approaches to zoning and land use to better align with changes in household preferences, life cycles, and aging residents.

Lawyer and planner Don Elliott recently published *A Better Way to Zone*, which contains ten principles for zoning that can apply to a range of communities. Several relate to expanding housing choice and are relevant for the City of Yuma:

- 1) **Zone for middle income households**—include a broad middle range of mixed-use zone districts that occupy the majority of the spectrum of zone districts. Allow multifamily development across a wide variety of mixed-use districts. This practice more effectively produces communities that support neighborhood-serving retail and commercial operations and small businesses by allowing the market to supply services near households.
- 2) **Revise zoning ordinances to better promote attainable housing**—step away from minimum lot sizes, minimum dwelling units sizes, and maximum densities of development. Allow more flexibility in zone districts to accommodate the wide range of housing products that accommodate the “missing middle.”
- 3) **Implement dynamic development standards**—recognize that communities change over time and development codes need to allow communities to adopt and

experiment with market innovations and accommodate changing housing preferences. Parking standards, for example, can vary based on use rates and existence of public parking lots in the area. In more traditionally zoned communities, it is most appropriate to “experiment” with dynamic zoning in mixed-use districts, which, as discussed above, should be generous in application and allow multifamily residential housing.

Other aspects of zoning include how households, family units, and disabilities are defined. A best practice in the definition of group homes is to set the unrelated persons limit to what has been legally defensible, generally 12 unrelated persons, including staff. Group home residency must be broad enough to include the homeless, those with social, behavioral or disciplinary problems, the elderly, those in hospice care, those avoiding domestic abuse, and/or disabled (which includes the frail, physically disabled, mentally ill, mentally retarded, persons with HIV/AIDS, and recovering from alcohol or drug addiction). This definition does not including current alcohol or drug addicts that are not in a treatment program for recovery or residents with a criminal history.

Group homes should be allowed in at least one, and preferably more, residential zoning districts. The unrelated persons limit could be increased if the group home is to be located in a multifamily, commercial, mixed use or other district.

Definitions of household and family should be flexible enough to allow a range of household and family configurations, especially those needed to accommodate caregivers. Language should avoid prescribing the makeup of a family unit (“husband and wife”).

The definition of disability must include what the courts have qualified as disability; those in recovery and with HIV/AIDS are often left out of the definition. A best practice is to have as broad a definition as possible to avoid multiplying the list of group facilities in ways that confuse the public and policymakers.

**Applying zoning recommendations to the AI.** This section does not prescribe a “right way” to zone. Instead, it reviews the jurisdictions zoning regulations against best practices, and assesses if the jurisdictions’ regulations could restrict housing choice.

**Public sector barriers from the 2015 AI.** The 2015 Analysis of Impediments to Fair Housing Choice used a HUD developed checklist, the “Review of Public Policies and Practices (Zoning and Planning Code)” produced by the Los Angeles office. This assessment found four areas for improvement in the city’s zoning ordinance and one barrier to affordable housing development in the city based on the state’s Qualified Allocation Plan scoring criteria. As shown in Figure II-4 below, none of the areas for improvement identified in the 2015 AI have been resolved.

**Figure II-4.  
Zoning Code Review Update to 2015 Findings**

Public Sector Policy	2015 Findings	2020 Update	Resolved? (yes/no)
<b>Definition of Family</b>	When the City updates its code, it may want to consider a broader definition of family that focuses on the functional aspects of a family rather than their familial relationship.	No change	no
<b>Definition of Disability</b>	The term “disability” it is not directly defined in the code. The city may want to consider adding a definition of the term disability that is consistent with the Fair Housing Act.	No change	no
<b>Reasonable Accommodation</b>	The city's code does not specifically address reasonable modification for residents with disabilities in municipal-supplied or managed housing. The city may want to add a definition of reasonable accommodation and related law.	No change	no
<b>Group Home Allowances</b>	There is a lack of residential care facilities in Low Density Single Family Districts. The city may want to clarify if group homes occupied as a single family home are allowed in this district.	No change	no
<b>State Qualified Allocation Plan Criteria</b>	Stakeholders perceive the allocation plan to favor Maricopa and Pima Counties.	The Qualified Allocation Plan scoring criteria grants 15 points to projects within proximity to transit, which is perceived as favoring counties within the state with robust transit systems.	no

Source: Root Policy Research.



## Land Use and Development

Adopted planning documents including the Comprehensive Plan and Zoning Ordinance's establish a vision for future development and a roadmap to achieve that vision through land use regulations. In addition to the most common regulatory barriers, the geographic zoning patterns and development trends influence housing choice and affordability.

The Yuma County Housing Needs Assessment (2012) states:

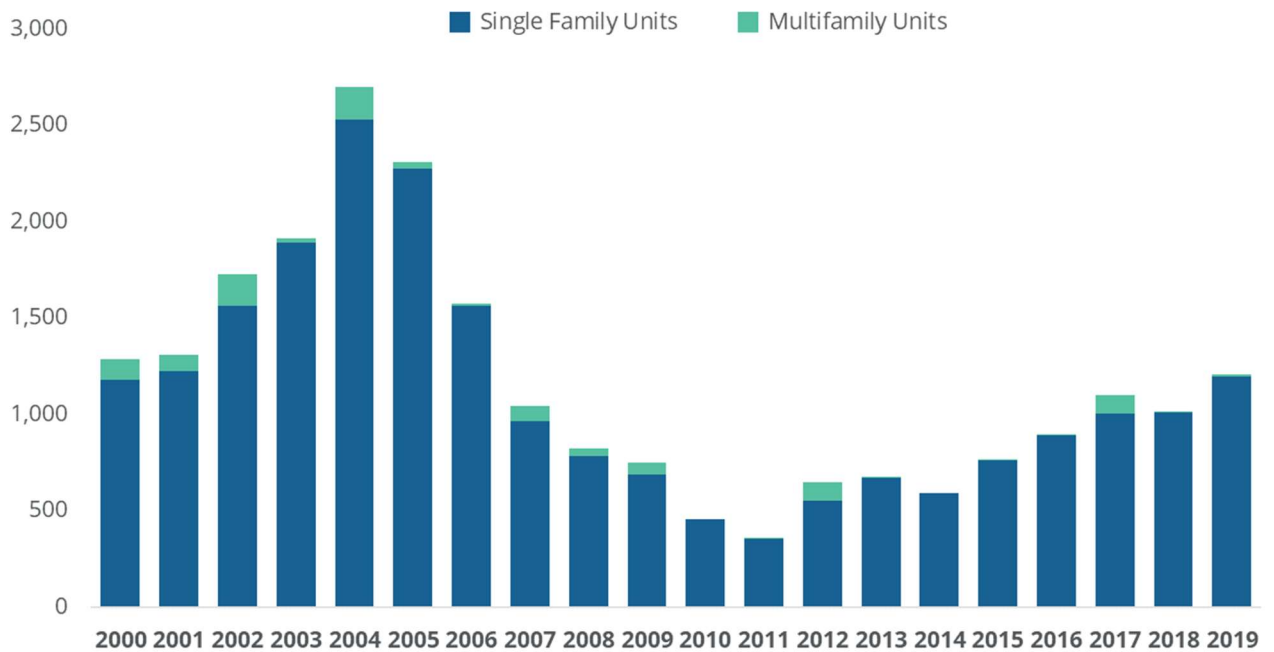
*"While the County has sufficient land zoned for residential development, the majority of land is designated for lower density residential development. Lower density homes provide housing options for many of the County's households, yet higher density housing and manufactured housing are more affordable to lower income households. Monitoring the County's vacant land inventory and Land Use Element to identify appropriate locations for higher density housing, including mobile homes, multi-family, and RV parks is essential. Increasing density on properties where affordable housing is provided as part of a proposed project is an important element of assuring adequate affordable housing supply."*

Recognizing the importance of having a variety of units to suit different lifestyles and affordability levels in the county is imperative for economic growth, future housing needs to be constructed for moderate income households. Additionally, it is essential to preserve the current inventory of affordable units in the county. While housing and economic growth are regional issues, policies and regulations that dictate development are determined locally.

**Residential permit trends.** Over the past 2 decades, building permits have been dominated by single family units, the peak for multifamily units was in 2004 with 167 multifamily units permitted and all multifamily units were in 5 or more units multifamily structures. As shown in Figure II-5 below, development activity drastically dropped during the Great Recession but has recently recovered to early 2000's levels.

Over the last five years, around half of Yuma County residential permits were in the city of Yuma, one fourth in San Luis, one tenth in Somerton and 2 percent in Wellton. Over the same time period, 116 multi-family units were permitted in Yuma County, 92 percent of those were permitted in the city of Yuma, 4 percent in Somerton, and 2 percent in Wellton.

**Figure II-5.**  
**Residential Building Permits, Yuma County, 2000-2019**



Source: Census Building Permits Survey.

In the city of Yuma, according to City provided data, since 2013 3,565 residential permits have been issued. The vast majority, 88 percent were for new residential structures, 7 percent for manufactured homes, 3 percent for park model homes, one percent for multifamily units, and another one percent for farm worker housing.

**Future residential development.** Figure II-6 shows the distribution of expected units in the City of Yuma based on the acreage of vacant land in each residential zone and the expected density based on the zoning regulations according to the city’s 2012 General Plan. Most future residential units are expected to be medium density—around 8 units per acre—followed by low density—around 3 units per acre. Future multifamily development—based on the acreage of vacant land zoned for multifamily development—is expected to make up roughly 12 percent of future housing growth.

**Figure II-6.  
Future  
Residential  
Development  
Estimates by  
Land Use**

Source:  
City of Yuma General Plan  
(2012),

General Plan Land Use Category	Expected Density (units/acre)	Vacant Acreage	Expected Units	% of Expected Units
Rural density	0.3	1,366	410	1%
Suburban density	1	262	262	1%
Low density	3	4,436	13,308	34%
Medium density	8	2,322	18,576	47%
High density	15	311	4,665	12%
Mixed use	5	424	2,120	5%
<b>Total</b>		<b>9,121</b>	<b>39,341</b>	<b>100%</b>

## Zoning and Land Use Review

This section summarizes the results of the supplemental zoning and land use review. It focuses on:

- Allowing a range of housing types, especially those that promote and produce affordable housing and housing for special populations;
- Mitigating requirements that raise housing costs; and
- Providing incentives for residential development.

**City of Yuma.** The Housing Element in the city’s General Plan—last updated in 2012—provides an analysis of existing conditions, future housing needs, and barriers to housing development. Generally, Yuma provides a variety of residential zoning districts and permits mixed use housing development within Transition Districts and Old Town. Within these districts a range of housing types are permitted including single family homes, manufactured homes, duplexes, multifamily units, mobile homes, recreational vehicles, residential care facilities, and nursing facilities.

The General Plan includes an objective to, “encourage a variety of housing types to meet all socioeconomic segments of the population, considering both full time and seasonal residents.” This objective is supported by the following policies:

- Policy 1.3.1: The City shall encourage an adequate supply of housing for low- and moderate-income residents.
- Policy 1.3.2: The City shall encourage a variety of housing types to accommodate the various needs of different socioeconomic groups in the community to meet the Smart Growth Principle of variety and affordability.

- Policy 1.3.3: The City shall enforce State and Federal fair housing laws to ensure equal housing opportunities to all regardless of race, ethnicity, color, national origin, religion, sex, disability, or familial status.
- Policy 1.3.4: The City shall develop ways to help mitigate the constraints to housing development through financial and regulatory incentives.
- Policy 1.3.5: The City shall work with AWC and NAU-Yuma to encourage the location of appropriate sites for student housing.
- Policy 1.3.6: The City shall expand opportunities for citizens to live in proximity to work and retail, meeting the Smart Growth Principle of a mix of land uses.

Yuma’s General Plan is due for an update, and stakeholders indicated that there are areas in the city where zoning and the plan do not match. There is interest in ensuring the General Plan reflects realities in the community moving forward.

**Definition of family.** As identified in the previous AI, the definition of family used in the zoning ordinance is outdated. The city’s definition of family allows for up to five unrelated persons to live together. This limits the opportunity for students and cooperative housing opportunities that have become increasingly popular as housing prices continue to outpace income growth. Additionally, it is a best practice to focus definitions of families—or preferably households—on the functional aspects of relationships instead of familial relatedness.

**Definition of disability.** There is no definition of disability in the city’s zoning ordinance as well as no accessible parking requirements. Ambiguity around requirements and protections for residents with a disability leave the city vulnerable to potential fair housing challenges. It is a best practice to include a broad definition of disability that complies with the Americans with Disabilities Act (ADA) definitions for Handicapped and includes court qualified disabilities such as those in recovery and with HIV/AIDS. Providing solid definitions that are in line with FHAA remove ambiguity in administration.

**Group homes.** Residential care facilities—commonly known as group homes—are limited by dispersal requirements in the City of Yuma’s zoning ordinance. Currently, “establishments of this type located within any residential districts shall not be located within 1,320 feet of a child day care services, large, a nursing care facility, large or small or a residential care facility, large or small, that are also located within any residential district.” According to the book *Group Homes* by Brian Connolly and Dwight Merriam, spacing requirements have been found by the courts to be a violation of the FHAA because of their effective limitations on housing choice for residents with a disability.

In addition to spacing requirements for group homes, these facilities are not permitted by right in single family districts. It is a best practice to permit group homes by right in

residential districts, if the building's scale and character are compatible with the zoning district. In areas where group homes are permitted as a special or conditional use, the required public hearing process can present potential fair housing challenges.

**Housing choice.** The public engagement process identified the lack of missing middle housing—duplex, triplex, townhome products and accessory dwelling units being allowed throughout the city—as a barrier for families who could own as renters. Barriers to housing choice, particularly in accessing homeownership, could be interpreted as a potential fair housing barrier to ownership which disparately impacts people of color. The city does permit ADUs throughout the city, but large lot requirements in residential districts are a barrier to the development of missing middle housing types.

The stakeholder engagement process identified the primary impediment to multifamily housing across the county is NIMBYism. In 2018 Yuma residents filed a referendum petition asking for the repeal of a zoning ordinance that would allow high density residential development in the Avenue B corridor citing transportation, school, and sewer impacts of higher density development. Residents did not have adequate signatures to lead to a vote, but a general plan amendment to upzone a residential property from medium density to high density for a project in the area was denied by City Council.

Additionally, there is a perception that the city's water and sewer fees are prohibitive for the construction of apartments compared to single family homes—however, City Council recently adopted changes to the method for calculating water and sewer fees that is intended to alleviate this issue. The city's code offers waivers for the payment of development fees for affordable housing or redevelopment and infill projects.

**Code enforcement.** The City of Yuma has a Rental Inspection program, “designed to protect the health, safety and welfare of persons residing in rental units within a Revitalization Areas.” Rental inspections and code enforcement are vital to minimizing health issues related to outdated rental inventory including asthma and lead poisoning. While rental inspections and code enforcement are a valuable tool to maintain health and safety, code enforcement programs that become targeted or discriminatory can become an issue under FHAA.<sup>5</sup> In the early 2000s, 16 current and former landlords who owned more than 100 rental units in St. Paul Minnesota filed against the city claiming code enforcement practices on problem properties had a disparate impact on minorities.<sup>6</sup>

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<sup>5</sup> *Magner v. Gallagher* argued, “Whether owners of rental properties may claim St. Paul city officials violated the Fair Housing Act by aggressively enforcing the City's housing codes, which increased rental costs and reduced the supply of low-income housing whose renters are disproportionately African-American.” (<https://www.law.cornell.edu/supct/cert/10-1032>)

<sup>6</sup> *Magner v. Gallagher*

**Recommendations for the City of Yuma.** We recommend the following modifications to the City of Yuma’s zoning and land use regulations to promote a more inclusive environment and mitigate potential barriers to housing development.

- Revise the definition of “family” in the zoning code. At a minimum, allow up to six unrelated individuals to live together. A best practice is to not define family through the zoning code to better facilitate inclusive housing arrangements, reflect changing preferences in sharing of residential units, and instead regulating through occupancy restrictions to prevent overcrowding.
- Include definitions of disabled and/or handicapped that are compliant with the FHAA.
- Include ADA parking requirements in the zoning ordinance.
- Allow compatible, community-based group homes by right in all residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.
- Remove spacing requirements for group homes. Spacing requirements have been found by the courts to be a violation of the FHAA because of their effective limitations on housing choice for residents with a disability.
- Embrace zoning best practices that facilitate a wide range of housing choices and opportunities in both lower density residential and higher density settings. Consider expanding the zone districts in which duplexes and townhomes are allowed and reduce minimum lot size requirements. Expand the use of mixed-use districts, compatible uses, and shared parking arrangements.
- Allow land zoned for multifamily development by right to protect against a fair housing challenge related to the zoning review process—which can attract NIMBYism and bias to the zoning process.
- Consider implementing Action Items from the General Plan Housing Element as follows:
  - Redesignation/Rezoning for Higher Density Residential - Consider rezoning land for higher density residential development to promote additional rental and lower cost ownership options.
  - Infill development program – Develop a program to reduce development costs and create incentives (impact fees or other government fees) for infill development projects. Incentives can target mixed-use development, accessory dwelling units, and in-fill within target neighborhoods

- Residential text amendments - Consider amending the zoning code to allow broader options for granny-flats as an alternative for the aging or disabled population
- Affordable Housing Strategy - Consider developing an Affordable Housing Strategy that provides incentives to encourage development of affordable units. An inclusionary housing ordinance may be included as part of the strategy. To best design an affordable housing strategy, a feasibility study should be completed and developers consulted

**Yuma County.** The county’s General Plan review of public policies and processes does not reveal any barriers to affordable housing development but does not promote affordable housing development either. The General Plan includes the following housing actions related to land use and development:

- Evaluate the feasibility of an incentive policy to encourage the development of affordable units—at 80 percent AMI or below—in market rate developments.
- Consider zoning or rezoning underutilized land and low density development to higher or mixed density residential.
- Review land use policies to incorporate changing preferences and ensure adequate areas are designated for multifamily and manufactured housing to meet the needs of the community.
- Map parcels available for residential development.
- Examine how zoning provisions, building codes, and land use updates impact the cost of production of housing.

**Definitions.** Yuma County’s definition of household, “any family living together as a single housekeeping unit in a dwelling unit,” is effective and does not attempt to regulate the number of unrelated individuals living together or the relationships that make up a family. On the other hand, the county’s zoning ordinance is silent on the definition of disability or handicapped. It is a best practice to include a broad definition of disability that complies with the Americans with Disabilities Act (ADA) definitions for Handicapped and includes court qualified disabilities such as those in recovery and with HIV/AIDS. Providing solid definitions that are in line with FHAA remove ambiguity in administration.

**Group homes.** The county’s zoning ordinance has two separate definitions that may qualify as a group home including a group care facility and health and personal care facilities. Distinguishing between group care facilities—for residents in recovery from substance abuse or reintegration—and personal care facilities—for residents with a disability—leaves avenues for fair housing challenges based on how the code is administered. Providing solid definitions that are in line with FHAA remove ambiguity in administration.

It is important to note that court rulings indicate sober living facilities are protected under the FHAA and it is a best practice to permit sober living facilities by right in residential districts. However, this definition does not include current alcohol or drug addicts that are not in a treatment program for recovery or residents with a criminal history.

Finally, group homes are not permitted in the rural zone, suburban ranch zone, or suburban site built zone. It is a best practice to permit group homes by right if the structure is compatible with the underlying zoning district. In other words, differential treatment of group homes based on the type of occupancy rather than health and safety considerations may present a fair housing challenge.

**Housing choice.** Similar to the city’s zoning ordinance, the county has detailed minimum lot size requirements that largely limit the scale and type of residential development permitted. While minimum lot size regulations are not inherently prohibitive, the county should evaluate the implications of existing regulations on the development of missing middle housing types—duplexes, triplexes, and ADUs—to encourage affordability and versatility in housing choice. While ADUs are permitted as a special use in all residential zoning districts, the special use process may invite bias and NIMBYism into land use decisions for this type of development.

In addition to ADUs, the county should examine mixed use designations. Currently, mixed use development is only permitted in planned developments and residential commercial zoning districts. The lack of land zoned by right for mixed use and multifamily development in the county is viewed as a barrier by stakeholders and public officials. Additionally, density limitations in zoning districts that permit multifamily development—medium density residential zoning district (R-2), high density residential zoning district (R-3), and the residential commercial zoning district (RC)—may impact the economic viability of multifamily development in the county. Multifamily developments are also required to provide two parking spaces per unit. It is a best practice to nuance parking requirements based on unit mix and proximity to transit and other community amenities; two parking spaces per units may be prohibitive to multifamily development.

**Recommendations for Yuma County.** We recommend the following modifications to Yuma County’s zoning and land use regulations to promote a more inclusive environment and mitigate potential barriers to housing development.

- Include definitions of disabled and/or handicapped that are compliant with the FHAA.
- Clarify the definition of “group homes” in the zoning ordinance. Currently both “group care facility” and “health and personal care facilities” may qualify as a group home. Providing clear requirements and regulations for group homes that do not differentiate based on the type of disability experienced by residents alleviates the potential for fair housing challenges.



- Allow compatible, community-based group homes by right in residential districts to facilitate inclusive shared living arrangements for residents with special needs, including persons with disabilities and persons in recovery.
- Encourage flexibility and nuance in parking requirements for multifamily developments based on unit mix and nearby community amenities—such as transit and employment centers.
- Promote gentle infill that is appropriate in single family settings and can facilitate much-needed attainable housing by permitting smaller lot sizes. Consider expanding the zone districts in which duplexes and townhomes are allowed and allowing detached ADUs on lots with adequate size and configuration.
- Investigate the available land in the county that permits multifamily development by right and consider relaxing maximum density allowances for multifamily development in areas where infrastructure can support higher density development.
- Implement action items from the county’s General Plan:
  - Evaluate the feasibility of an incentive policy to encourage the development of affordable units—at 80 percent AMI or below—in market rate developments.
  - Consider zoning or rezoning underutilized land and low density development to higher or mixed density residential.
  - Review land use policies to incorporate changing preferences and ensure adequate areas are designated for multifamily and manufactured housing to meet the needs of the community.
  - Map parcels available for residential development.
  - Examine how zoning provisions, building codes, and land use updates impact the cost of production of housing.

## Private Sector Actions

The concluding section in this chapter focuses on private sector actions that could present barriers to fair housing choice. It contains an analysis of Home Mortgage Disclosure Act (HMDA) data, which report lending activity of financial institutions.

**Mortgage lending.** Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. The inability of residents to obtain loans for home purchases, home improvements and mortgage refinancing not only creates barriers to choice for residents, but can also have adverse effects on the neighborhoods in which private capital is limited.

HMDA data are collected by the Federal Financial Institutions Examination Council (FFIEC) and are the best source of information on lending practices to protected classes and in minority and low income neighborhoods. HMDA datasets contain loan application records with information on the race, ethnicity, gender, and income of the applicant, as well as loan terms.<sup>7</sup> The data are widely used to detect evidence of discrimination in lending practices, although analysis of the publicly available data is limited by lack of applicant credit information. In other words, HMDA data variables can be used to explain many of the reasons for lending disparities (e.g., poor credit history), but do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to an applicant (e.g., credit score). The HMDA data analyzed in this section reflect loans applied for by residents of Yuma County in 2019, the latest year for which HMDA were publicly available at the time this document was prepared. It also compares the results of the HMDA analysis with lending outcomes reported in the last regional AI.

**Loan applications in Yuma County.** During 2019, households in Yuma County submitted 6,648 loan applications for home purchases, loan refinances and home improvements. As shown in Figure II-7 below, the majority of loan applications (53%) were for home purchases, another 45 percent for refinancing (with 19% for cash out refinancing), and 2 percent for home improvement.

In 2014, the last time mortgage loan records were analyzed for an AI, there were 3,619 loan applications and they were split almost evenly between those home purchases (51%) and refinancing (48%). This represents a 64 percent increase from 2014, but it is still below the level of applications in 2009, when around 7,300 applications were submitted.

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<sup>7</sup> HMDA data includes information for mortgage loans, home improvement loans, and refinancing loans.

**Figure II-7.  
Distribution of Mortgage Loan  
Applications by Loan Purpose,  
Yuma County, 2019**

Note:

Does not include loans for multifamily properties, non-owner occupants, and second liens.

Source:

FFIEC 2019 Raw Data and Root Policy Research.

	Number of Applications	Distribution
Home purchase	3,541	53%
Home Improvement	112	2%
Refinancing	1,724	26%
Cash out refinancing	1,271	19%
<b>Total</b>	<b>6,648</b>	<b>100%</b>

**Loan type and loan outcomes.** Among these loans applications, 42 percent were conventional loans, 27 percent were Federal Housing Administration (FHA) insured loans, 26 percent were Veterans Affairs (VA) guaranteed loans and the remaining percent were USDA Rural Housing Service or Farm Service Agency guaranteed (Figure II-8).

Of the loan applications, around two thirds (63%) resulted in the loan being originated; 17 percent of applications were withdrawn by the applicant; and 11 percent of applications were denied. A smaller proportion of applications had files that were closed for incompleteness (6%), and another 2 percent of applications were approved but not accepted by the applicant. These outcomes do not differ significantly from loan outcome in 2014 and 2009.

**Figure II-8.  
Loan Type and Action  
Taken, Yuma County,  
2019**

Note:

Does not include loans for multifamily properties, non-owner occupants, and second liens.

Source:

FFIEC 2019 Raw Data and Root Policy Research.

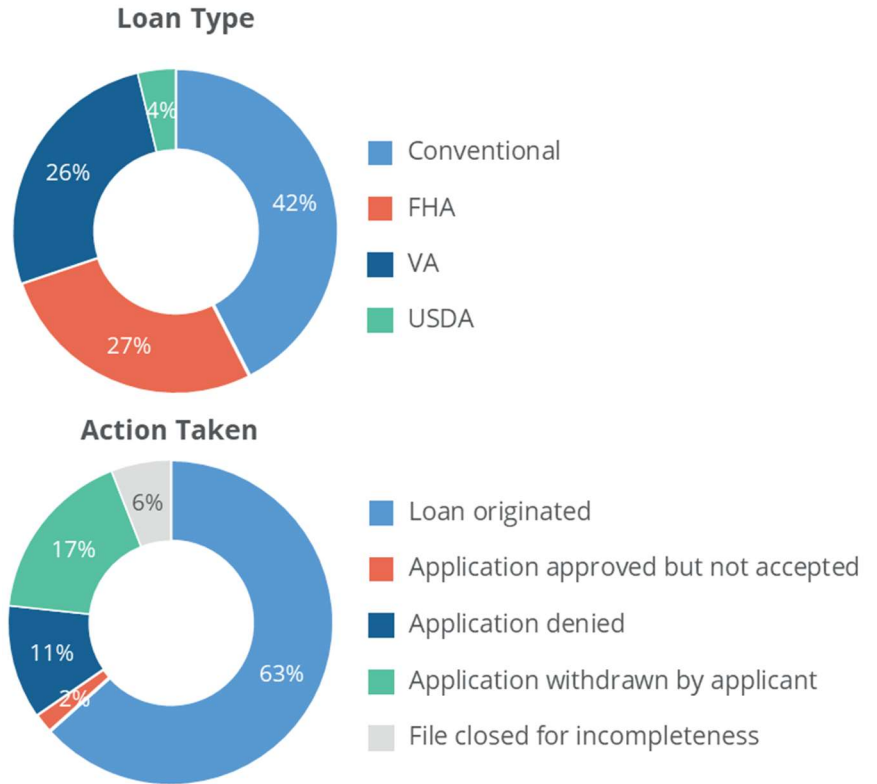


Figure II-9 below shows the percent of applications denied and denial rates by income level. The denial rate is defined as the number of denied loan applications divided by the total number of applications excluding withdrawn applications and application files closed for incompleteness. This measure of denial provides a more accurate representation of applications with an opportunity for origination and is consistent with the methodology used by the Federal Reserve in analyzing HMDA denial data. Not surprisingly, the lowest income applicants had the highest denial rates.

**Figure II-9.  
Loan Originations and Denials by  
Income Level, Yuma County, 2019**

Note:

Does not include loans for multifamily properties, non-owner occupants, and second liens. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source:

FFIEC 2019 Raw Data and Root Policy Research.

	Percent Originated	Percent Denied	Denial Rate
Less than 50% MFI	49%	22%	31%
50-80% MFI	64%	15%	18%
80-100% MFI	65%	12%	15%
100% MFI+	66%	9%	12%

**Loan outcomes by race/ethnicity.** Figure II-10 presents detailed outcomes of the loan applications, focusing on the difference in outcomes among racial and ethnic groups.

The racial group with the highest denial rate was Native Hawaiians, however, the number of applications is too small to draw accurate comparisons. The denial rate among American Indian or American Natives was 12 percentage points higher than for White applicants and the denial rate among black or African American applicants was 7 percentage points higher.

Comparing denial rates for Hispanic and Non-Hispanic applicants, the difference is minimal, and this was also the case in 2014.

There are many reasons why denial rates may be higher for certain racial and ethnic groups. First, some racial and ethnic groups are very small, so the pool of potential borrowers is limited and may skew towards lower income households, since minorities typically have lower incomes. Loan denial rates can also vary by race and ethnicity based on the loan purpose applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

Analyzing the types of loans applied for by applicants of varying races and ethnicities found small variation in loan purpose by ethnicity. Hispanic applicants were slightly more likely than non-Hispanic applicants to apply for home purchase loans (57% v. 51%, respectively). Among racial groups, Black or African Americans (49%), American Indian or Alaska Natives (41%), and Native Hawaiian or Other Pacific Islanders (18%) were less likely to apply for home purchase loans than Whites (57%).

**Reasons for denial.** HMDA data also provide data on why loans were denied, which can help explain differences in denials among racial and ethnic groups. Figure II-11 shows the reasons for denials in Yuma County.

Loan application denial reasons across race and ethnicity were dissimilar. For Hispanic applicants, inadequate or poor credit history and debt-to-income ratio were the primary reasons for denial (53%). Among non-Hispanic applications, although inadequate or poor credit history and debt-to-income ratio were top denial reasons (44%), insufficient collateral was also a top reason, cited as a denial reason 18 percent of the time. In 2014, insufficient collateral was the top denial reason (26%) for non-Hispanics, and the distribution of denial reasons among Hispanics has not changed materially.

Among other races, Asian applications were denied due to debt to income ratio or incomplete credit application. The primary denial reason for African Americans was insufficient collateral. For American Indian or American Native and Native Hawaiian or Other Pacific Islander's, the primary denial reason was credit history.

**Figure II-10.**  
**Action Taken by Race and Ethnicity, Yuma County, 2019**

	Loan Originated	Application Denied	Not Accepted by Applicant	Application Withdrawn	File Closed	Total Applications	Denial Rate
<b>Yuma County</b>	<b>63%</b>	<b>11%</b>	<b>2%</b>	<b>17%</b>	<b>6%</b>	<b>6,648</b>	<b>15%</b>
<b>Race</b>							
White	66%	10%	2%	17%	5%	5,296	13%
Black or African American	55%	14%	1%	21%	8%	132	20%
Asian	64%	13%	1%	15%	7%	85	17%
American Indian or American Native	47%	17%	3%	23%	10%	94	25%
Native Hawaiian or Other Pacific Islander	9%	64%	0%	9%	18%	11	88%
<b>Ethnicity</b>							
Non-Hispanic	64%	11%	2%	18%	6%	2,732	14%
Hispanic	64%	11%	2%	16%	6%	3,130	15%
<b>Proportion Differences</b>							
Black/White Difference	-11%	4%	-1%	5%	3%	-5,164	7%
American Native/White Difference	-19%	7%	1%	7%	4%	-5,202	12%
Hispanic/Non-Hispanic Difference	0%	1%	0%	-2%	1%	398	1%

Note: Does not include loans for multifamily properties, non-owner occupants, and second liens. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source: FFIEC 2019 Raw Data and Root Policy Research.

**Figure II-11.**  
**Denial Reasons by Race and Ethnicity, Yuma County, 2019**

	Credit History	Debt to Income Ratio	Insufficient Cash	Unverifiable Information	Collateral	Credit Application Incomplete	Employment History	Other
<b>Yuma County</b>	<b>27%</b>	<b>21%</b>	<b>3%</b>	<b>4%</b>	<b>14%</b>	<b>15%</b>	<b>3%</b>	<b>14%</b>
<b>Race and Ethnicity</b>								
White	29%	20%	3%	4%	14%	13%	3%	14%
Black or African American	26%	16%	0%	0%	32%	5%	0%	21%
Asian	0%	36%	9%	0%	0%	27%	0%	27%
American Indian/American Native	56%	13%	0%	0%	0%	19%	0%	13%
Native Hawaiian/Other Pacific Islander	57%	29%	0%	0%	14%	0%	0%	0%
<b>Ethnicity</b>								
Non-Hispanic	26%	18%	3%	1%	18%	16%	2%	16%
Hispanic	31%	22%	3%	5%	10%	14%	3%	13%
<b>Proportion Differences</b>								
Hispanic/Non-Hispanic Difference	5%	4%	0%	4%	-8%	-2%	0%	-3%

Note: Does not include loans for multifamily properties, non-owner occupants, and second liens. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source: FFIEC 2019 Raw Data and Root Policy Research.

**High priced loans.** Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that high priced loans are not always predatory or clear indicators of fair lending issues, and that the numerous factors that can make a loan “predatory” are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted. For the purpose of this section we define “high priced” as a loan with an ARP of more than one and half (1.5%) percentage points above comparable treasuries.

Figure II-12 shows the proportion of loans that are high priced by ethnicity and income level using the HUD-defined Median Family Income (MFI). The proportion of high-priced loans among Hispanic households is double the proportion for Non-Hispanics (22% compared to 11%). Interestingly, the proportion of high cost loans is higher among Hispanic households with income above 50 percent MFI.

**Figure II-12.  
High Priced Loans Ethnicity, Yuma County, 2019**

	Overall	Median Family Income Group			
		Less than 50% MFI	50-80% MFI	80-100% MFI	100% MFI+
<b>Yuma County</b>	<b>16%</b>	<b>23%</b>	<b>25%</b>	<b>19%</b>	<b>14%</b>
Ethnicity					
Non-Hispanic	10%	25%	19%	16%	9%
Hispanic	22%	22%	22%	29%	24%

Note: Does not include loans for multifamily properties, non-owner occupants, and second liens. Denial Rate is the number of denied loan applications divided by the total number of applications, excluding withdrawn applications and application files closed for incompleteness.

Source: FFIEC 2019 Raw Data and Root Policy Research.

In Yuma County in 2014, 14 percent of the loans were subprime, and there were more than twice as many subprime loans (211 loans) to Hispanic borrowers, compared with non-Hispanic borrowers (101 loans).

From a policy perspective, these data suggest that Hispanic households in Yuma County may benefit from a range of mortgage loan and personal finance assistance to achieve lower priced loans. On a home priced at the median sold price in 2020 of \$166,750<sup>8</sup> a 1.5

<sup>8</sup> Assuming a 10 percent down payment and assuming the average interest rate during 2020 of 3.11 percent.

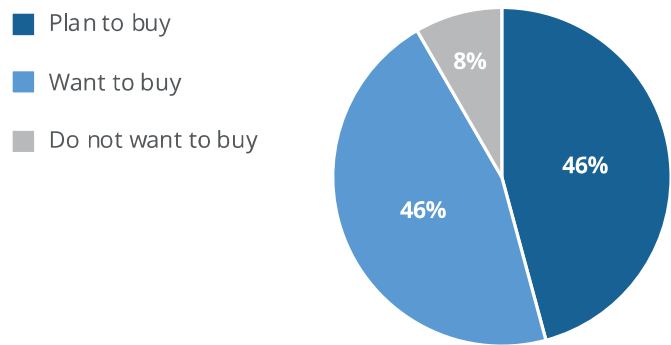


percentage point difference over the average interest rate translates to around \$41,150 in extra interest paid throughout the life of the loan, or around \$1,370 more per month.

According to the 2020 Yuma County Resident Housing Choice Survey, as shown in Figure II-13, the greatest share of renters who want to buy have not yet done so because they have too much debt, do not have a down payment, or their credit score is too low.

**Figure II-13.**  
**Desire to Buy and the Top Two Reasons Why Renters Who Want to Buy Continue to Rent**

Which of the following is most true for you?



Top Two Reasons Why Renters Who Want to Buy Have Not Yet Bought		
I have too much debt (credit cards, car loans, school loans) to qualify for a mortgage	35%	<div style="width: 35%;"></div>
Can't come up with a down payment	32%	<div style="width: 32%;"></div>
Bad credit/low credit score	21%	<div style="width: 21%;"></div>
Housing is not affordable to buy where I want to live	17%	<div style="width: 17%;"></div>
There is no affordable housing I want to buy	12%	<div style="width: 12%;"></div>
Don't want to buy until I'm done with school/graduate	9%	<div style="width: 9%;"></div>
No credit history	9%	<div style="width: 9%;"></div>
The type of home I want to buy is not available in the area of Yuma County I want to live	9%	<div style="width: 9%;"></div>
I don't want to buy anywhere in Yuma County	7%	<div style="width: 7%;"></div>
I have been told by lenders that I won't qualify for a loan	6%	<div style="width: 6%;"></div>
Affordable housing isn't available at all—I would live anywhere in Yuma County	4%	<div style="width: 4%;"></div>
Cash and above-market offers by other buyers	4%	<div style="width: 4%;"></div>
I prefer to keep renting/do not want to buy	3%	<div style="width: 3%;"></div>
Multiple/seasonal jobs don't allow me to qualify for a mortgage	3%	<div style="width: 3%;"></div>
Tried to get a mortgage and couldn't qualify	2%	<div style="width: 2%;"></div>
Can't afford homeowner association/condo dues on top of a mortgage	1%	<div style="width: 1%;"></div>

Note: Data for all Yuma County renters are shown. Sample sizes are too small to report findings by resident characteristics.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Alternative financial products.** Households who are rejected from traditional or even higher-cost lending products—or who are unaware of or distrust traditional lenders—use alternative financial products, many of which carry very high interest rates and inhibit financial stability and wealth-building.

A cornerstone of the Federal Deposit Insurance Corporation’s (FDIC) economic inclusion (<https://www.economicinclusion.gov/whatis/>) project is a study of what the FDIC has identified as unbanked households. “Unbanked” households are those in which no one in the household has a checking or savings account. The latest, 2019, survey found that:

- 1) 5.4 percent of U.S. households are “unbanked,” which is the lowest rate since the study began in 2009. The unbanked rate fell by a 1.1 percentage point between 2017 and 2019.
- 2) The State of Arizona has an unbanked rate of 4 percent, lower than the U.S. overall. This rate was lower than in 2017, when it was 5.4 percent.
- 3) In the State of Arizona, unbanked rates vary by ethnicity and education. An estimated 9 percent of Hispanic households are unbanked, compared to 1.5 percent of White households. Around 10 percent of households with only a high school diploma are unbanked, compared to 2.1 percent of households with some college.

Households who turn to predatory lending products can end up trapped in a cycle of debt in which the borrower is forced to refinance the loan for ever increasing interest rates. In addition, the size of the loan is often much smaller than what a traditional bank would offer.

*SECTION III.*

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DISABILITY AND ACCESS

## Section III. Disability and Access Analysis

This section examines the housing challenges and access to opportunity specific to residents living with a disability or households with at least one member living with a disability in the City of Yuma.

### Primary Findings

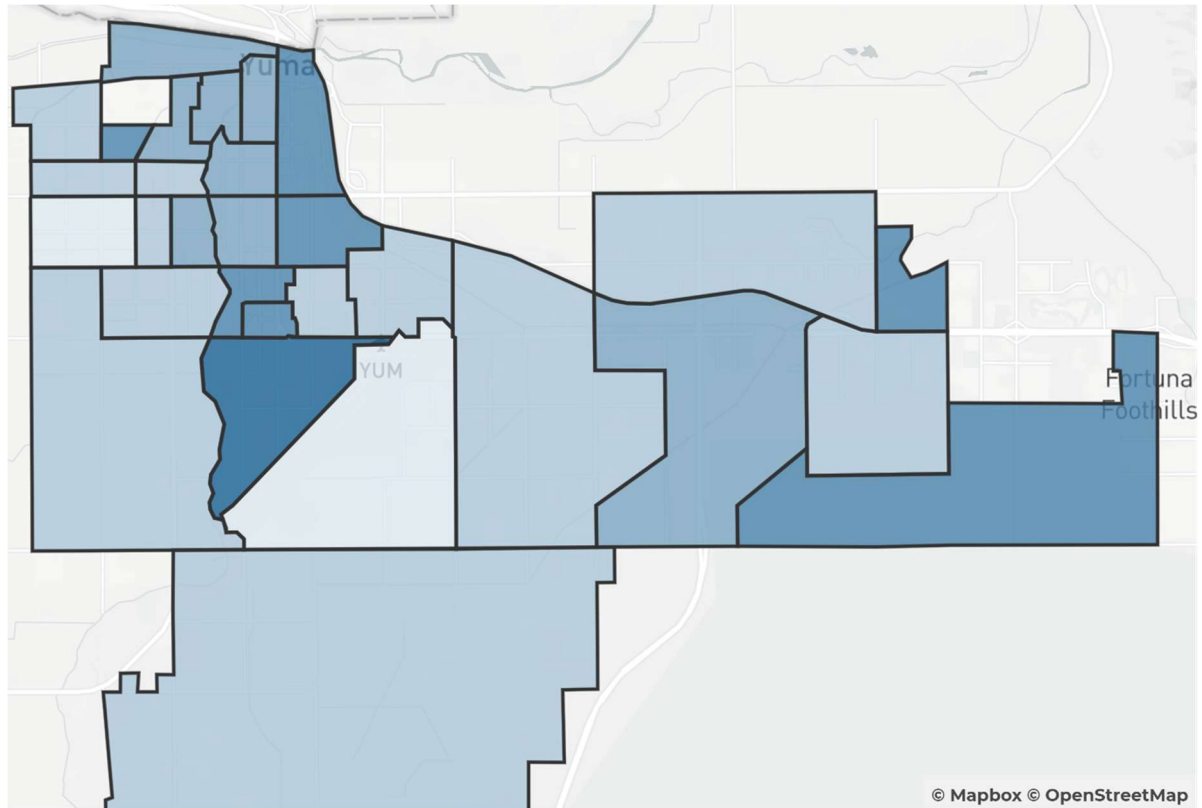
- In 2019, 12 percent of residents in the City of Yuma were living with a disability—an estimated 11,244 residents. Residents living with a disability are likely to increase as the population ages, as will housing and service needs: Residents living with ambulatory and self-care difficulties need accessible housing units and/or reasonable modifications to age in the community.
- Residents with disabilities face many challenges to housing choice: they are disproportionately challenged by the lack of deeply affordable rentals due to their relatively low incomes leading to higher rates of housing instability (20% of residents with disabilities v. 7% for all residents); are more likely to live in “doubled up” conditions (20% v. 12%); and more likely to live in housing in poor condition (29% v. 20%) and without needed accessibility features (28% of residents with disabilities).
- Most residents living with a disability do not participate in the labor force—and many want to but face significant barriers to employment access. Residents provided the following suggestions to improve employment outcomes for residents with disabilities: improving access to effective Vocational Rehabilitation, Employment Services, and other employment supports, expanding the number of businesses willing to hire residents with disabilities, transportation system improvements, and mental and behavioral health care services.
- Sidewalk improvements and access to effective public transportation are primary concerns for residents living with a disability in the region.

### Population Living with a Disability

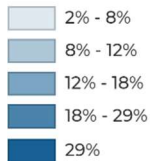
In 2019, 12 percent of residents in the City of Yuma are living with a disability—an estimated 11,244 residents. Figure III-1 below shows the share of residents living with a disability by census tract in the city. The highest concentration of residents living with a disability (29%) is in the census tract adjacent to the airport to the northwest. Overall, residents with a disability are distributed throughout the city.

#### Figure III-1.

## Map of Percent of Population Living with a Disability by Census Tract



### Population Living with a Disability per civilian noninstitutionalized capita



Source: 2019 ACS 5-year and MySidewalk.

Figure III-2 shows the share of the noninstitutionalized population with a disability by type of disability. The distribution of disabilities by type is very similar between the city and county. Ambulatory difficulties are most prevalent with 7 percent of residents follows by cognitive difficulty (4.6%), hearing difficulty (4%), self-care difficulty (2.4%), and vision difficulty (2.1%). Residents living with a disability are likely to increase as the population ages, and residents living with ambulatory and self-care difficulties need accessible housing units and/or reasonable modifications to age in the community.

**Figure III-2.  
Percent of  
Noninstitutionalized  
Population with a  
Disability by Type**

Note:  
\* percent of noninstitutionalized  
population over 5 years old.

Source:  
2019 ACS 5-year.

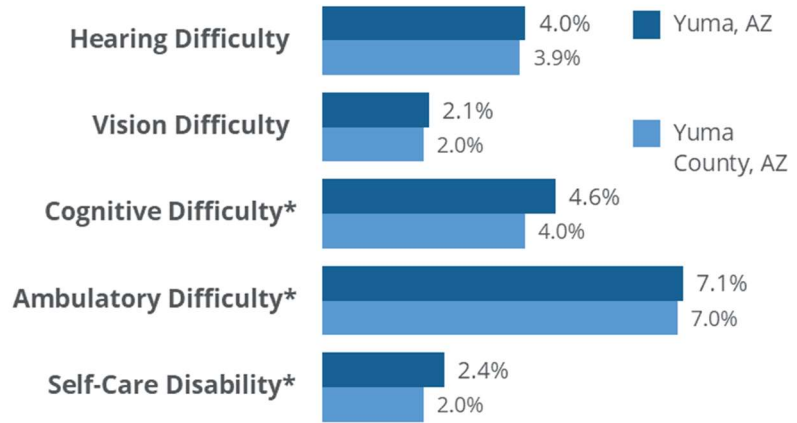


Figure III-3 shows the distribution of residents with a disability by age. Nearly half (48%) of residents in the City of Yuma living with a disability are over 65 years old. The working age population living with a disability makes up 42 percent of residents with a disability in the city. Again, as this population ages, residents with a disability will likely increase.

**Figure III-3.  
Percent of Residents with a  
Disability by Age for Residents  
with a Disability**

Source:  
2019 ACS 5-year.

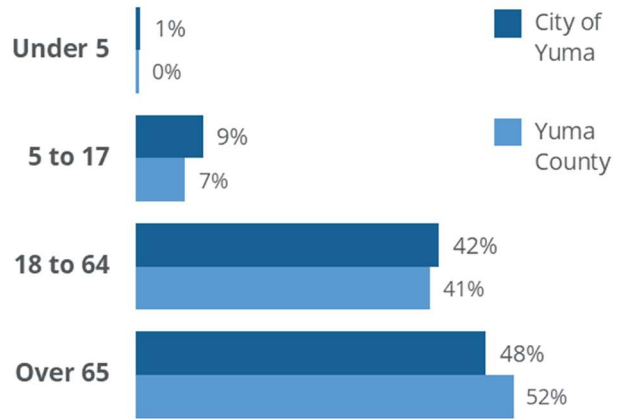
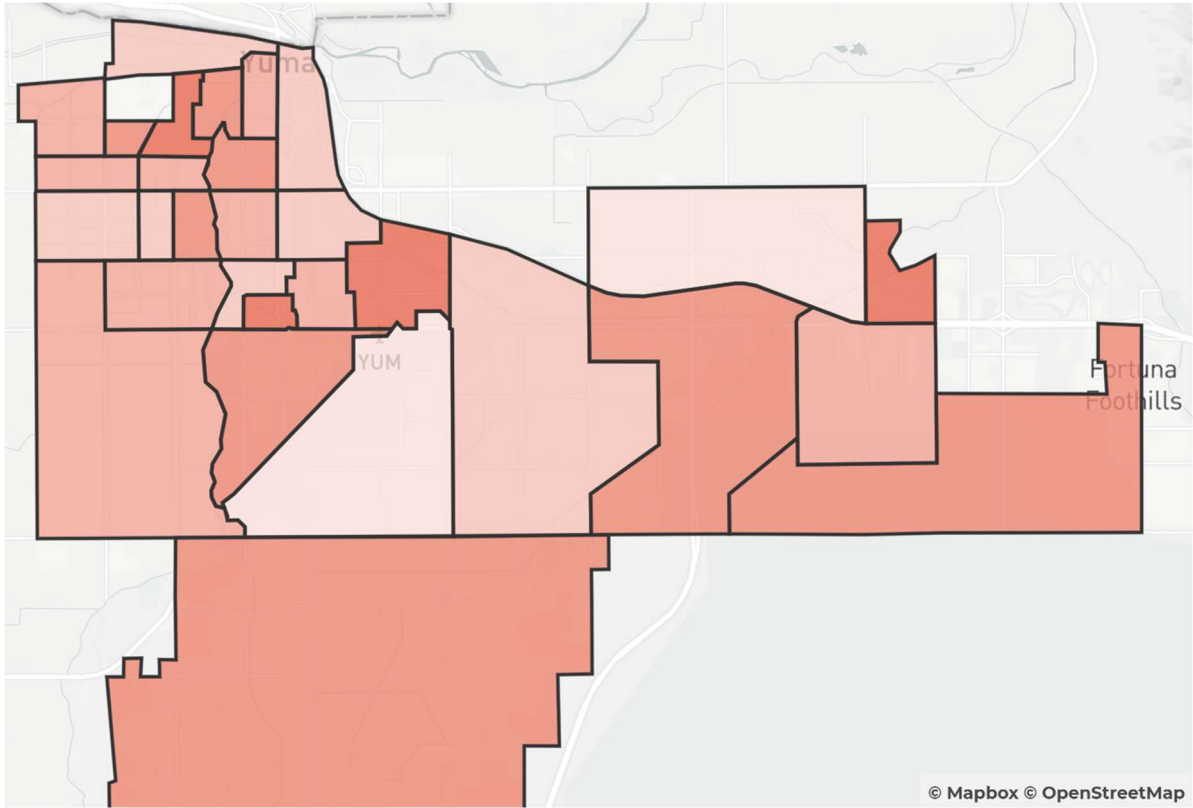


Figure III-4 shows the share of residents over 65 years old living with a disability out of all residents with a disability by census tract. Seniors (65 years and over) living with a disability make up the majority of residents living with a disability throughout the city and there are pockets of these residents in areas with assisted and senior living facilities. The distribution of this population throughout the city creates a need for accessible and affordable transportation options for this group to access services, amenities, and employment.

**Figure III-4.**  
**Map of the Percent of Disabled Residents over 65 by Census Tract**



**Disability Age Over 65 normalized by  
Population Living with a Disability**

- 0% - 26%
- 26% - 41%
- 41% - 56%
- 56% - 75%
- 75% - 82%

Source: 2019 ACS 5-year and MySidewalk.

## Housing

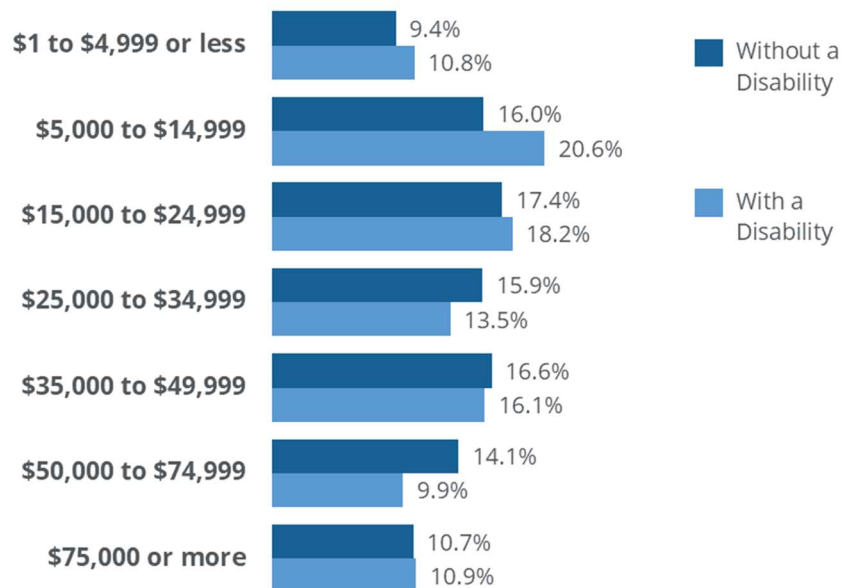
This section provides insights from the resident survey conducted for this AI and the ACS to inform the housing needs and experiences of residents living with a disability.

**Affordability.** Households living with a disability are faced with a shortage of units to meet their needs, a significant lack of units affordable at their income, and are often forced to double up with family and friends. Overall, residents with a disability have a poverty rate of 23 percent while the population without a disability has a poverty rate of 16 percent.

Among the population 16 years and over with earnings, residents with a disability have lower earnings as shown in Figure III-5. Half of residents living with a disability earned less than \$25,000 compared to 43 percent of residents without a disability. For a single person household living with a disability and earning less than \$25,000, the maximum affordable monthly housing cost is \$625 per month.

**Figure III-5.**  
**Income**  
**Distribution by**  
**Disability Status**

Source:  
2019 ACS 1-year.



**Fixed incomes.** Many residents living with a disability are living on a fixed monthly income because of difficulties accessing employment opportunities. The Social Security Administration reports that the average monthly amount received by an eligible person with a disability in 2019 was \$1,234. This income, Social Security Disability Income (SSDI), is available only to people who have had a work history and is equivalent to about \$14,800 per year. Supplemental Security Income (SSI) is available to people who do not have a work history or who don't not qualify for SSDI. These payments are set to \$783 per month, equating to about \$9,400 per year.



**Doubled up.** The community engagement process conducted for this AI provides insight into residents' experience with housing choice and access to economic opportunity. Among Yuma County survey respondents, 12 percent report that they have friends or family living with them due to a lack of housing that meets their friend or family member's needs. One in five (20%) of households that include a member with a disability are doubled up—suggesting that lack of affordable housing has a disproportionate impact on persons with disabilities.

**Utilities.** Many households in Yuma struggle to pay their utility bills each month, including one in four households that include a member with a disability. In a focus group with residents with disabilities, participants explained that their voucher requires them to rent units with utilities included in the rent. The purpose of the policy is to promote housing stability, as utility bills can be unaffordable, especially to extremely low income households. In their experience, only smaller landlords that own old apartment buildings offer utilities included with the rent, and these units are clustered in the older part of town, limiting the neighborhoods where these voucher program participants can live. As such, participants expressed a desire for more rentals in better neighborhoods or more modern buildings to include utilities.

**Instability and discrimination.** According to the resident survey conducted for this AI, about 20 percent households that include a member with a disability experienced housing instability in the past five years, compared to 7 percent of all respondents. Renters, low income households, and households that include a member with a disability, and those who are currently precariously housed all believe they experienced housing discrimination at rates at least twice that of survey respondents overall. Housing discrimination and fair housing will be further discussed in Section IV.

**Housing condition.** Among protected classes, residents with a disability are most likely to have housing condition issues. In the tight rental market, residents and stakeholders describe a reluctance to request repairs, mostly out of gratitude to have a place to live, while noting some tenants fear rent increases or other retaliation. It was not uncommon for participants in the focus group with residents with disabilities to share that landlords refuse to make repairs.

These residents described feeling uncomfortable asking for repairs, and this was especially true of participants transitioning out of homelessness. Some landlords charge for repairs and there are waitlists for repairs as well. A participant noted that after living under substandard conditions she contacted Achieve and they handled the situation and helped her find a better place. Most participants just put up with the lack of maintenance and repairs, thinking that they should be grateful for having a place to live, or worry that if they ask for repairs their rent will increase.

**Accessibility needs.** Of the respondents whose household includes a member with a disability, 92 percent have accessibility needs in the home or to access the home. **More than one in four (28%) live in a home that does not meet the accessibility needs of their household member with a disability.**

The most common improvements or modifications needed include:

- Grab bars in the bathroom;
- Alarm to notify if someone leaves the house;
- Ramps;
- Walk/roll in shower;
- Fire alarm/doorbell made accessible for person with hearing disability/deaf.

Other modifications or accommodations needed include lowering the kitchen and bathroom counters, permission to have a service or emotional support animal, reserved accessible parking by the front entrance, stair lifts, and fencing around the so that a child with disabilities does not go into the street.

**Most needed services or supports to achieve or preserve the housing situation best for a household member with a disability.** The most common suggestions for what is needed to help the person with a disability in the respondents' household live or continue to live in their preferred housing situation include:

- Accessibility modifications to the home;
- Affordable housing;
- Access to needed therapies, behavioral health services, medical care, and affordable in-home care;
- Neighborhood accessibility improvements—sidewalks, street lighting, accessible crossing signals, traffic enforcement;
- Activities, sports, and park play spaces accessible to children with disabilities; and
- Improved access to transit and improvements to bus stops, such as shade and seating.

Examples of resident comments include:

- *“More outdoor and indoor play areas. More doctors and specialists that work and support people with disabilities. Different sports and activities that support and welcome people with disabilities.” (Resident survey respondent)*

- *“My daughter is autistic and cannot share a room with her brother whom has adhd. She is sensitive to sounds and is annoyed by her brother so I need them to both have separate rooms.” (Resident survey respondent)*
- *“Ayudarla con la pavimentacion de la banqueta.” Help with paving the sidewalk. (Resident survey respondent)*
- *“We provide a home for our son with a severe mental illness. There are very limited programs for parents to purchase home for adults with mental illness. So, we have stepped up to the plate and Yuma won't have to pay for his housing. Since we refinanced our home to purchase his home, we would like to see a "goodwill finance rate," a tax credit for taking care of a mentally ill person's home, monthly reimbursement for the mortgage on his home.” (Resident survey respondent)*

In focus groups, some participants with disabilities described experiencing discrimination when trying to make reasonable accommodation requests for support animals. These participants were unsure of their rights and wanted to learn about their rights. Stakeholders suggested that the tight housing supply makes residents less willing to complain about discriminatory treatment out of fear of compromising their housing situation.

- *“We haven't seen any fair housing issues. We are in San Luis, but families don't report because they don't want to get into trouble.” (South County stakeholder focus group participant)*
- *“Very seldom hear of anyone claiming they were discriminated against. It all goes back to the same problem, because there are not enough homes, so they will put up with a lot.” (South County stakeholder focus group participant)*
- *“Have heard of people having really bad landlords—they will ask for prayer in church because they're being treated badly.” (South County stakeholder focus group participant)*

**Resident priorities.** Stakeholder and resident focus group participants living with disabilities provided their recommendations for housing and community development priorities. These ranged from affordable housing, including affordable homeownership, to utility assistance, case management and other services to maintain stability in housing, crime prevention and safety improvements in Mesa Heights, increased visibility of housing issues by San Luis and Somerton elected officials, and more resources dedicated to homelessness services.

- *“Upgrade apartment building conditions;”*
- *“Invest in a community center that is similar to the senior center, but for people with disabilities;”*

- *“More patrol units in the evening and night in Mesa Heights and invest in crime prevention measures;”*
- *“Pay attention to pedestrian safety, enforce crosswalks;” and*
- *“Fix potholes.”*

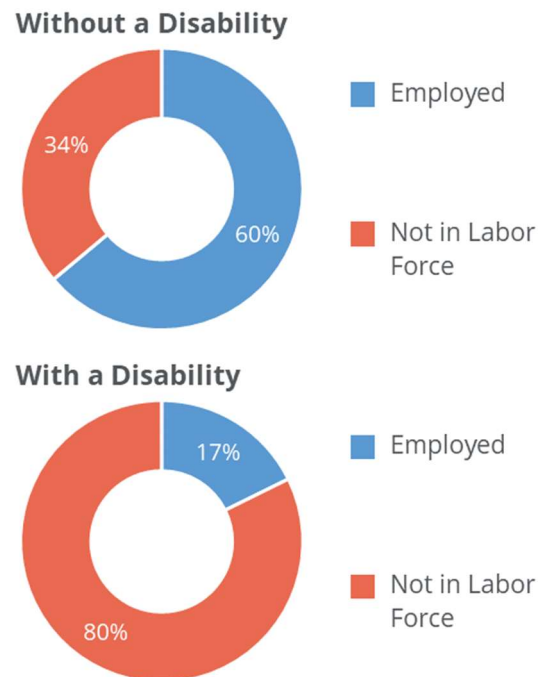
## Access to Opportunity

This section addresses access to opportunity—including employment, transportation, and neighborhood access—for residents living with a disability.

**Access to employment.** Figure III-6 shows the employment status of residents aged 16 and over by disability status. Three in five residents without a disability are employed whereas less than one in five residents with a disability are employed.

**Figure III-6.**  
**Employment Status by Disability Status for the Population Aged 16 and over**

Source:  
2019 ACS 1-year.



Survey respondents whose household includes a working-age member with a disability offered suggestions to support meeting their household member’s employment goal. The most common suggestions include improving access to effective Vocational Rehabilitation, Employment Services, and other employment supports, expanding the number of businesses willing to hire residents with disabilities, transportation system improvements, and mental and behavioral health care services.

- *“Easy access to Employment Services, current services require so many steps and requirements. Eventually frustration becomes a problem.” (Resident survey respondent)*

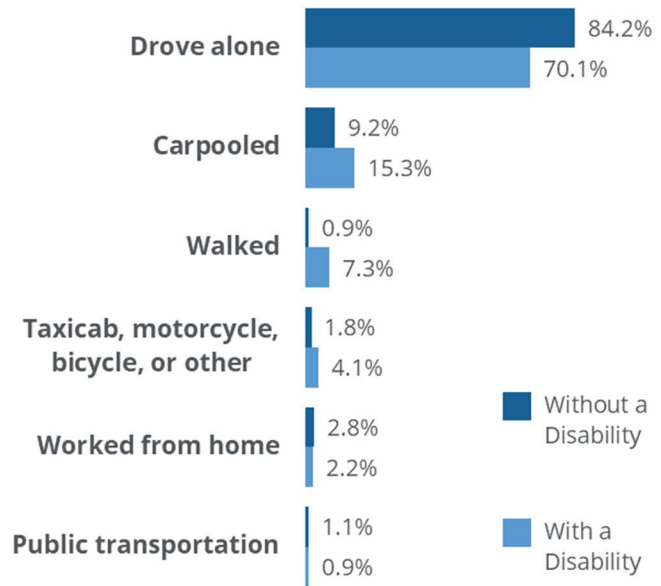
- *“Que haya mas ofertas de trabajo para los discapacitados, que no sean ignorados ni olvidados.” That there are more job opportunities for the disabled; that they are not ignored or forgotten. (Resident survey respondent)*
- *“Employers who understand and can learn to work with a mentally ill person. Overall, my son is quite capable of work, but will by nature of his illness, will have a couple of bad days a month.” (Resident survey respondent)*
- *“Agencies that teach and support people with disabilities for the long run.” (Resident survey respondent)*
- *“Que haya un centro de entrenamiento para esa persona y la preparen para el trabajo.” Have a training center for that person and prepare them for the job. (Resident survey respondent)*
- *“Proper transportation.” (Resident survey respondent)*
- *“More companies that are educated in working with an individual with disabilities.” (Resident survey respondent)*
- *“We have a list of orgs and companies that offer felony friendly employment, but the main barrier (to employment) is transportation. YCAT used to give us passes and this now happens only rarely.” (Homelessness focus group participant)*

**Access to transportation.** The geographic distribution of residents living with a disability across the city emphasizes the importance of access to transportation for this group. Persons with disabilities who live in an area that is not covered by transit service systems often do not have other options and are very isolated and dependent on family and friends for all transportation needs. Not only does this have an impact of their ability to socialize and access health care, it also impacts their ability for employment and their choice in housing options.

For disabled workers over 16 years old, 70 percent commuted to work in their own car, 15 percent carpooled, and 7 percent walked. A limited transit system—both in terms of hours of operation and geographical reach—can limit housing choices for persons with disabilities and their ability to work, as well as access to supportive services and amenities.

**Figure III-7.  
Method of Commuting to  
Work by Disability Status**

Source:  
2019 ACS 1-year.

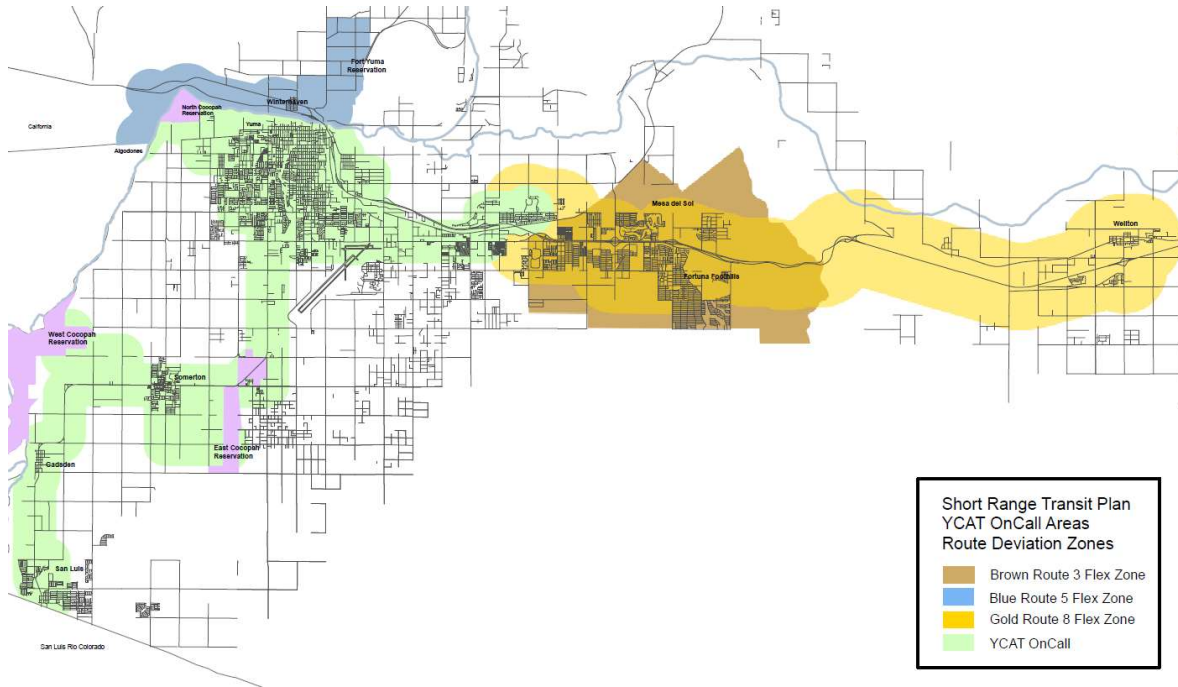


**Yuma County Area Transit (YCAT).** YCAT provides fixed route, vanpool and demand responsive bus service throughout southwestern Yuma County including the cities of Yuma, San Luis, Somerton, Town of Wellton, Cocopah Indian Reservations and unincorporated communities of Yuma County. YCAT provides service Monday through Friday from 5:25 a.m. to 8:30 p.m. and Saturday from 9:30 a.m. to 6:30 p.m. with limited evening services from Arizona Western College, Northern Arizona University and University of Arizona and other specific Yuma County and eastern Imperial County destinations until 11:00 p.m. on weekdays.

The YCAT system map has not been modified since 2014. Most routes meet at the Downtown Yuma Transit Center on 3rd Street and Gila Street, Cocopah Casino Resort, El Centro Regional Bus Transfer Terminal (transfer to Imperial Valley Transit routes), Arizona Western College and Walmart at the corner of 26th Street and Avenue B in Yuma, also known as the West Yuma Transfer Hub.

YCAT OnCall is demand response transportation service that provides door to door transportation for individuals who, because of a disability, are not able to utilize a regularly scheduled fixed route bus service or if the rider cannot access a fixed route bus stop. If the rider does require more assistance beyond the door, an attendant or personal care attendant may ride free. Arrangements can be made on a case-by-case basis for those persons requiring extra assistance. Figure III-8 shows the current YCAT OnCall Service Areas. For residents who do not live within the OnCall Service Areas WACOG Area Agency on Aging works with Transportation Providers with Yuma County to provide free transportation to seniors age 60 and older, and younger adults with disabilities.

**Figure III-8.  
OnCall Service Areas**



Source: YCAT

**Public transportation challenges.** As discussed above, access to public transportation is needed, particularly for residents who are homeless, those with disabilities who cannot drive, and for residents who cannot afford a personal vehicle. Most adults in Yuma County drive or carpool with others to get to the places they need to go. Stakeholders and resident focus group participants describe the YCAT bus system as being generally good, considering the size of Yuma County’s population, but stops are few and far between, and not all employment centers are served by YCAT.

- *“YCAT bus system is generally good but the nearest stop is two blocks from the Mission, which is difficult for those with accessibility needs,” (Homelessness focus group participant)*
- *“Need to have easier accessibility to get [household member with a disability] transportation to and from their job.” (Resident survey respondent)*

**Neighborhood challenges.** When asked what is needed to help their household member with a disability to access community amenities, facilities and services, survey respondents made numerous suggestions. Among the most common were accessibility improvements such as sidewalks, parks, and playgrounds, activities inclusive of children and adults with disabilities, and improved public transportation.

- *“Sidewalks would go a long way.” (Resident survey respondent)*

- *"It would be nice if there was a park on this side of town. People used to use school playgrounds as parks on the westside, but now all school grounds locked. My disabled person would like to walk places, but not safe in this neighborhood." (Resident survey respondent)*
- *"Más actividades físicas y sociales." More physical and social activities. (Resident survey respondent)*
- *"Transportation with assistance to get in and out." (Resident survey respondent)*
- *"Necesita que la ciudad ponga mas atencion en cuanto como los recidentes de la comunidad no respetan las banquetas para que ella podieron caminar sin miedo a trampezar/chocar con vehiculos que obstruin el camino." She needs the City to pay more attention to how community residents do not respect the sidewalks, so that she could walk without fear of trapping/colliding with vehicles that obstruct the road. (Resident survey respondent)*
- *"Se necesita que haya un centro de actividades para hacer diferentes tipos de ejercicios para estas personas." There needs to be an activity center to do different types of exercises for these people. (Resident survey respondent)*



*SECTION IV.*

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ENFORCEMENT AND FAIR HOUSING RESOURCES

## Section IV. Enforcement and Fair Housing Resources

This section of the AI reviews the fair housing environment in Yuma based on fair housing laws, legal cases, and existing fair housing resources.

### Primary Findings

- One in 25 (4%) survey respondents believe they experienced discrimination when looking for housing in Yuma County. Residents who identify with a racial group other than White and are non-Hispanic were most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic).
- Housing instability and displacement are most prevalent among low income households, Limited English Proficiency (LEP) households, non-Hispanic and non-White households, and households that include a member with a disability.
- In order to determine whether any of the jurisdiction's minority groups appear underrepresented in the City of Yuma's HUD-funded programs, Root analyzed CAPERs from the past three years (2017, 2018, 2019) and compared the race and ethnicity of beneficiaries to the overall city population. The review found that the City of Yuma is providing resources and services to populations who are typically vulnerable to discrimination and face barriers to fair housing choice.
- Outreach and educational campaigns about fair housing issues have ramped up in the City of Yuma, and partnerships to improve outcomes for residents have been implemented. The city has made progress in many of the priority areas identified in the previous AI in 2016.

## Legal Framework

Fair housing rights and protections are governed by the federal and state fair housing acts.

**Federal Fair Housing Act.** The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status, and disability. In 2021 President Joe Biden signed an executive order that indicates all laws that prohibit discrimination on the basis of sex—including the Fair Housing Act—shall be interpreted to prohibit discrimination on the basis of sexual orientation and gender identify as well. The Fair Housing Act—Amended (FHAA) covers most types of housing including rental housing, home sales, mortgage and home improvement lending and land use and zoning. Excluded from the FHAA are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members and housing for older persons.<sup>1</sup>

The FHAA requires the U.S. Department of Housing and Urban Development (HUD) to administer its programs and activities in a manner which “affirmatively furthers” the policies of the FHAA. This obligation extends to all federal agencies that administer housing and urban development programs, as well as subrecipients of those funds—including cities, counties, and states.

The method through which subrecipients demonstrate affirmatively further fair housing (AFFH) has changed significantly during the past decade. In 2016, HUD implemented a new rule that strengthened the reporting obligation (“Assessment of Fair Housing”). That rule was reversed in 2020, leaving recipients of federal housing and community development funds with a broad interpretation of how to demonstrate their obligation to AFFH.

**State fair housing laws.** The Arizona Fair Housing Act mirrors the FHA, prohibiting discrimination based on a person's race, color, religion, sex, handicap (or disability), familial status, or national origin.<sup>2</sup> Discrimination is defined as: refusal to sell, rent, negotiate or otherwise make unavailable or deny a dwelling; refusal to make reasonable accommodations in rules, policies, practices or services when such accommodations may be necessary to afford a person with a disability equal opportunity to use or enjoy a dwelling.

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<sup>1</sup> “How Much Do We Know? Public Awareness of the Nation’s Fair Housing Laws”, The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

<sup>2</sup> Familial status means households with children under 18 years of age living with their parents or guardians, pregnant women or people securing the custody of children under 18 years of age.

## Legal Cases, Complaints, and Housing Discrimination

This section provides an overview of the fair housing landscape in the City of Yuma and Yuma County based on legal cases, complaints, and resident survey responses.

**Legal cases.** We searched the U.S. Department of Justice for housing and civil enforcement section cases in Yuma. None were identified at the time of this report.

A review of fair housing legal cases reported by the federal Department of Justice and maintained by the National Fair Housing Advocate case database found two cases occurring in the Yuma County region, both of which are more than ten years old and summarized below. More recently in 2020, a disparate impact case out of Pima County is also summarized below.

### **Southwest Fair Housing Council Inc. v. Maricopa Domestic Water**

**Improvement Dist.** In this case, the Southwest Fair Housing Council argued that Maricopa Water District's practice of requiring residents in public housing to pay a larger security deposit has a discriminatory impact under FHAA. In 2015, the water district increased fees for public housing residents—based on years of negotiations with Pima County to resolve unpaid water fees at their public housing properties. As a result, public housing tenants were required to pay \$200 upfront compared to \$75 in upfront fees for other residents. In the end, the disparate impact claim was not sufficiently robust to rule in favor of the plaintiff.

**Avenue 6E Investments, LLC vs. City of Yuma, Arizona.** In February 2009, Avenue 6E Investments LLC and Saguaro Desert Land, Inc. filed a lawsuit seeking injunctive relief and approximately \$3.2 million in damages against the City of Yuma. The developers claimed, among other things, that the City of Yuma violated the federal Fair Housing Act by denying a request to rezone certain property from a minimum of 8,000 square foot lots (R-1-8) to 6,000 square foot lots (R-1-6). The rezoning request was approved by the city's Planning Commission and later denied by City Council. The plaintiff argued that, based on an analysis of Home Mortgage Disclosure Act and homes sales data, smaller lots would produce single family homes at price points that were attainable to lower to moderate income Hispanic households. The plaintiff also argued that the rezoning denial stemmed from intentional discrimination based on public testimony about the rezone. The United State Court of Appeals ruled in favor of the developer and the city and developer settled the claim with the city. That settlement resulted in a rezoning of 360 acres of land to facilitate the construction of up to 1,800 affordable for sale units.

**United States v. The Mortgage Super Center.** This 2004 case involved a mortgage company and a realty company that breached a conciliation agreement they had entered into with HUD to resolve a complaint that the defendants had discriminated on the basis of national origin. As part of the agreement, the defendants agreed to pay \$1,000 to the complainants and to refinance the complainants' first and second mortgages as one loan.

This complaint alleged that they failed to do so. The consent decree prohibited the defendants from discriminating on the basis of national origin, required fair housing training, and required the defendants to pay the complainants \$8,358.85. The consent decree, issued by the Department of Justice, remained in effect for three years.

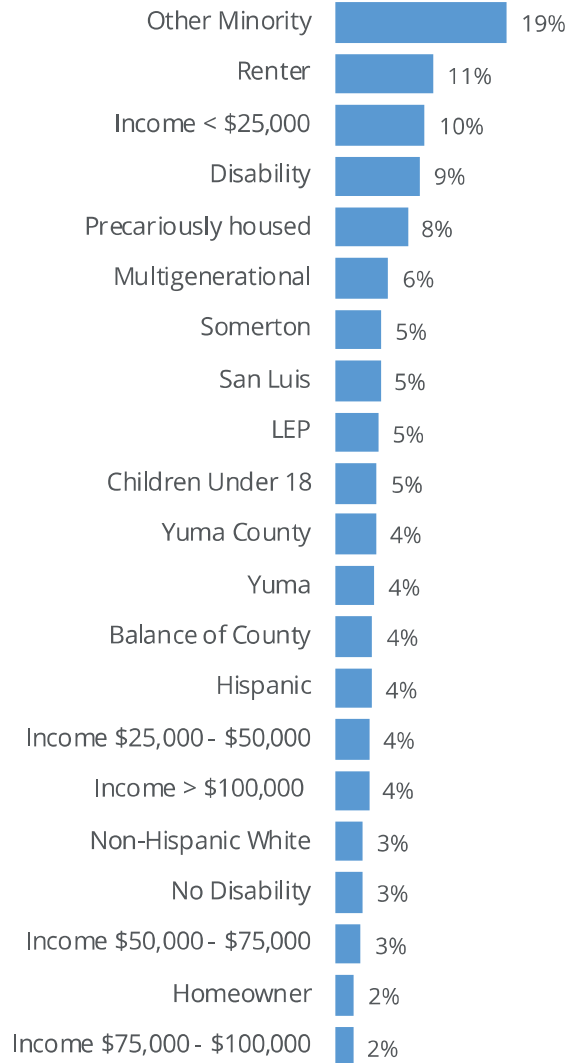
**Southwest Fair Housing Council v. Sundown Apartments.** In the spring of 2016, the Southwest Fair Housing council filed a complaint with HUD accusing a Yuma apartment property of discriminating against Hispanic applicants by having agents claim falsely that there were no units available, or the rent was artificially higher. This complaint was a result of the Southwest Fair Housing Council's testing program in which a Spanish speaking tester responded to an ad for an apartment from Craigslist for Sundown Apartments. The complaint seeks a court order to stop the owner of the property from denying "individuals of Hispanic origin meaningful access to and full and equal enjoyment of defendants' rental properties."<sup>3</sup>

**Experience with housing discrimination.** Overall, one in 25 (4%) survey respondents believe they experienced discrimination when looking for housing in Yuma County. Residents who identify with a racial group other than White and are non-Hispanic were most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic). Renters, low income households, and households that include a member with a disability, and those who are currently precariously housed all believe they experienced housing discrimination at rates at least twice that of survey respondents overall.

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<sup>3</sup> <https://www.phoenixnewtimes.com/news/hispanics-shunned-at-yuma-apartment-building-says-southwest-fair-housing-council-8124122>

**Figure IV-1.**  
**When you looked for housing in the city of Yuma, San Luis, Somerton, the town of Wellton, or unincorporated Yuma County, did you ever feel you were discriminated against? (% Yes)**



Note:  
 Discrimination did not necessarily occur in the community of current residence. Housing Subsidy sample too small to report.

Source:  
 Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

When asked to describe the reason why they felt discriminated against, the reasons included:

- Race or ethnicity (50%);
- Income (16%);
- Age (16%);
- Looks or appearance (16%);
- Familial status/having children/family size (9%);
- Sex or gender (9%);
- National origin/immigration status (9%);

- Disability (3%);
- Housing subsidy/Section 8 (3%); and
- Bad credit/history of eviction or foreclosure (3%).

Examples of how respondents described their experience include:

- *“I was once told my kind did not know how to pay rent or keep units clean.” (Resident survey respondent)*
- *“Because I am Hispanic, and it wasn't until they learned that my husband works for the BP that we were paid attention to.” (Resident survey respondent)*
- *“Because not a lot of the properties that were open for rent would accept my housing voucher/Section 8.” (Resident survey respondent)*
- *“En algunos lugares no quieren niños.” In some places they do not want children. (Resident survey respondent)*
- *“Por ser hispana y no suficiente ingreso.” For being Hispanic and not enough income. (Resident survey respondent)*
- *“We were told to look on a rougher side of town instead of the side we wanted.” (Resident survey respondent)*
- *“When I arrive the price change after I was told a price on the phone.” (Resident survey respondent)*

In focus groups, some participants with disabilities described experiencing discrimination when trying to make reasonable accommodation requests for support animals. These participants were unsure of their rights and wanted to learn about their rights. Stakeholders suggested that the tight housing supply makes residents less willing to complain about discriminatory treatment out of fear of compromising their housing situation.

- *“We haven't seen any fair housing issues. We are in San Luis, but families don't report because they don't want to get into trouble.” (South County stakeholder focus group participant)*
- *“Very seldom hear of anyone claiming they were discriminated against. It all goes back to the same problem, because there are not enough homes, so they will put up with a lot.” (South County stakeholder focus group participant)*
- *“Have heard of people having really bad landlords—they will ask for prayer in church because they're being treated badly.” (South County stakeholder focus group participant)*

**Displacement.** Barriers to housing choice, including direct discrimination, can cause higher rates of housing instability among some protected classes. According to the resident survey to support this study, housing instability and displacement are most prevalent among low income households, Limited English Proficiency (LEP) households, non-Hispanic and non-White households, and households that include a member with a disability.

In the last five years, two in five renters experienced displacement—having to move when they did not want to move. Half of low income households and 43 percent of Limited English Proficiency (LEP) respondents were displaced. In addition to personal reasons such as divorce or other household changes, the primary drivers of displacement are rents increasing more than the tenant could pay, insufficient income to pay the rent due to job loss or reductions in hours, the owner selling the home, and inability to pay utilities. Pre-COVID, eviction due to failure to pay the rent or rules violations played a small role in displacement (4% and 2% respectively).

About one in five Non-Hispanic, non-White respondents (Other Minority), low income households, and households that include a member with a disability experienced housing instability in the past five years, compared to 7 percent of all respondents. Indicators of housing instability included having to move in with someone else temporarily/"couch surf," sleeping in a vehicle, temporary stays in hotels or motels or camping, staying in a homeless shelter or domestic violence shelter, or living in transitional or other temporary housing.

## **Fair Housing Enforcement, Outreach Capacity, and Resources**

While the Civil Rights Division of the Arizona Attorney General's Office investigates and resolves housing discrimination complaints, the Arizona Department of Housing (ADOH) takes the role of education and training of housing providers to ensure awareness of fair housing laws.

The City of Yuma provides information about the Fair Housing Act, resources to report discrimination, and links to helpful webpages at [www.yumaaz.gov/government/community-development/neighborhood-services/fair-housing](http://www.yumaaz.gov/government/community-development/neighborhood-services/fair-housing).



Yuma residents who believe they have experienced discrimination in violation of the Federal Fair Housing Act (FHA) or state and local fair housing laws may report their complaints to the following entities:

- Community Legal Services, with an office in Yuma— <http://www.clsaz.org/>
- Western Arizona Council of Governments (WACOG)— <http://www.wacog.com>
- HUD’s regional Office of Fair Housing and Equal Opportunity (FHEO), located in San Francisco—accessed by calling 1-800-347-3739;
- The Civil Rights Division of the Arizona Attorney General's Office (ACRD)— <https://www.azag.gov/fair-housing>; or
- Non-profit fair housing organizations in the state, including:
  - The Arizona Fair Housing Center—<http://azfairhousing.net/>
  - Southwest Fair Housing Council—<http://swfhc.com/>
  - The Arizona Center for Disability Law— <http://www.azdisabilitylaw.org/>

Fair housing complaints must be filed within one year of the alleged discrimination.

## **City Efforts to Address Housing Needs and Fair Housing Impediments**

Jurisdictions which receive funds are required to file a Consolidated Annual Performance and Evaluation Report (CAPER) with HUD that requires, among other items, that jurisdictions report on “actions taken to overcome the effects of any impediment identified in the jurisdiction’s analysis of impediments to fair housing choice.” This can be drawn from the accomplishments tracked as part of the jurisdictional Fair Housing Action Plan (FHAP). The latest CAPERs were reviewed as part of this AI. This section provides a summary of fair housing activities undertaken by the city since their last AI in 2016.

The previous AI conducted for the City of Yuma in 2016 identified several public sector contributing factors that affect housing choice including the State of Arizona Qualified Allocation Plan (QAP); lack of public transportation in Yuma and the region; and lack of resources to make older parts of Yuma accessible, expand afterschool programming and assist persons with disabilities transition out of institutional care.

Since the AI update in 2016 the city has taken the following actions to **address housing needs** in the city:

- **Rehabilitation and preservation of affordable units.** As part of the City Council’s efforts to support low income housing in Yuma, in 2017 the City provided a

loan of up to \$1,900,000.00 to the Housing Authority of the City of Yuma (HACY) to convert up to 235 City-owned public housing units into the United States Department of Housing and Urban Development (HUD) Rental Assistance Demonstration (RAD) program. This loan from the City allowed HACY to secure financing to rehabilitate and preserve the low income units.

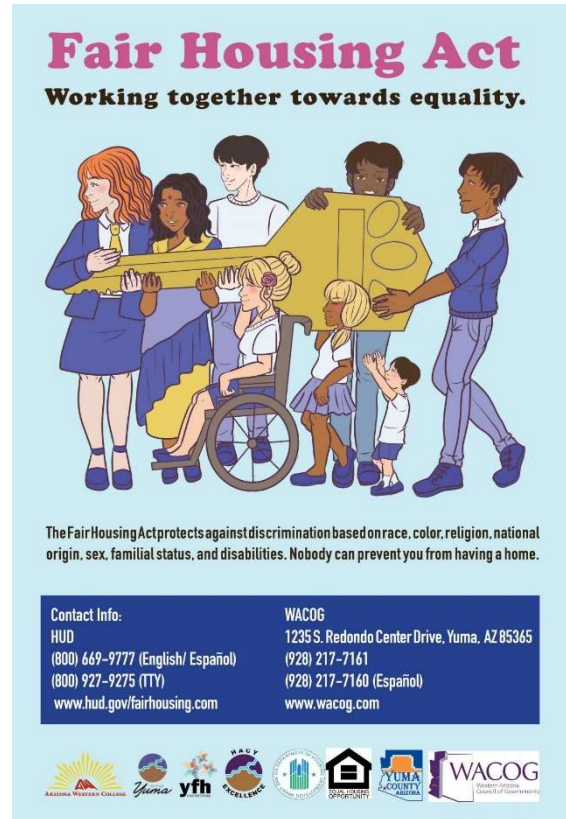
- **Land use flexibility and increased density.** In 2019, the City reached a settlement agreement with 6E Investments to allow the rezoning of 360 acres for affordable housing development at a density of 5 units per acre—a change from 8,000 square foot lots to 6,000. The rezoning and increased density will facilitate the development of approximately 1,800 affordable for sale homes priced at an average of \$138,000—affordable to households earning \$46,000.
- **Utility fees for new multifamily.** In 2020 the City updated the wastewater capacity charges for the construction of new multifamily housing complexes to permit developers to install an upsized master meter. The previously adopted rate structure based on the number of units in a development increased the cost of construction for new apartments—a type of housing needed in the city. With the adopted changes, rather than requiring individually metering each dwelling unit and paying individual wastewater capacity charges—which is more costly—developers have the option to install an upsized master meter. This revision was made to decrease costs and encourage much-needed multifamily development in Yuma.
- **Infill incentive.** The City’s Planning Division developed an infill incentive ordinance that modifies development standards for construction of housing in older, established neighborhoods. The ordinance provides flexibility in regulations regarding lot sizes, setbacks, lot coverage and fees to encourage housing development that is more affordable. This has made a big impact on development of vacant lots in older neighborhoods within the city of Yuma.
- **Accessory dwelling units.** The City adopted an ordinance that allows the construction/establishment of accessory dwellings units on lots, which are currently or will be developed with a single-family residence. Accessory dwelling units offer our community a variety of benefits, including an increased supply of affordable housing. By providing affordable housing options, communities can retain population groups that might otherwise be priced out of the housing market.
- **Donation of land to support affordable rental housing.** In 2016, the City supported an application for a Low Income Housing Tax Credit (LIHTC) project in the Mesa Heights Neighborhood. It was awarded tax credits for 58 new rental units that were completed in 2017 and fully occupied in 2018. The city has also reduced development impact fees for affordable housing.

- **Outreach and education.** The City of Yuma continues to fund nonprofit partners to conduct fair housing outreach and education, as well as testing.

Since the AI update in 2016 the city has taken the following actions to **address impediments** to fair housing choice:

- **Preserve affordable housing and increase accessibility of units.** Rehabilitation of homes occupied by disabled, elderly, and low-income homeowners to provide safe, decent and sanitary housing and improve housing conditions in high poverty areas. Program priorities are to eliminate health and safety code violations, improve accessibility for persons with disabilities, and improve energy efficiency. If lead-based paint was found, it was mitigated as part of the rehab.
- **Lower disparities in access to educational enrichment activities for low-income children.** CDBG funds allowed Arizona Classical Ballet to provide free after-school ballet lessons to homeless children staying at the Crossroads Shelter. The Housing Authority of the City of Yuma (HACY) coordinates the SHINE Program that provides after school activities for students in low income areas. HACY also administers SHINE Mentor, a leadership program for high school students in Yuma. Last summer, NorthStar, a nonprofit partnered with YMCA to offer Club FIT at Gila Vista Jr High, located in the Mesa Heights NRSA. They provided daily practice for various sports, art, culinary arts, and dance/theater for a very nominal fee. Unfortunately, due to the pandemic most local youth enrichment activities were cancelled this summer.
- **Improving conditions in high poverty neighborhoods.** CDBG funding is prioritized in low-income target areas, largely the Mesa Heights neighborhood, to address differences in neighborhood condition. In 2019, the City administered code enforcement and housing rehabilitation programs. The Code Enforcement/Rental Inspection Program ensured that rental housing units met City code to protect the health, safety, and welfare of tenants. Fair housing information was distributed to all tenants whether or not a rental inspection was completed. The City used either CDBG to assist with or simply coordinated with property owners to demolish and clear vacant, extremely dilapidated homes to reduce blight and crime in the areas surrounding these properties.
- **Fair housing (FH) education and enforcement.** The City contracted with WACOG to implement a Fair Housing Program. Unfortunately, due to the Coronavirus pandemic, many local events, including the Fair Housing Festival and meetings that provide opportunities to give presentations or hand out Fair Housing information were cancelled. WACOG was able to move from in-person Housing Counseling and workshops to virtual formats where FH information was provided to attendees. They also counseled individuals with FH violation complaints. Two of these complaints were forwarded to Southwest Fair Housing Council for enforcement.

The City also coordinated with the AZ Western College Graphic Design instructor to hold a FH poster contest among his students to raise fair housing awareness and provide contact information on resources. Each student submitted a design. Unfortunately, just after they were submitted and before a winner was chosen, the pandemic caused most public facilities to close, so they were not displayed for the public. WACOG placed Fair Housing billboards in high traffic areas and posted Fair Housing information on their social media pages. Fair Housing brochures are included in the Yuma Association of Realtor's new member packets. Also, links to local, regional, state, and federal Fair Housing resources are listed on the City's webpage.



**Southwest Fair Housing Council fair housing testing.** The Southwest Fair housing Council (SWFHC), based in Tucson, performs tests and processes fair housing inquiries for the Yuma region. SWFHC data can be used to establish trends in fair housing complaints and discrimination as well as to investigate and support fair housing complaints. Fair housing testing is conducted using two testers—one used as the control and the other represents one of the protected classes. Testers that are paired together represent the same socioeconomic category to determine if differential treatment is based solely on the protected class difference. Finally, test results either support allegations of fair housing violations or does not support allegations when no fair housing violations are uncovered.

**HUD funded program beneficiaries.** In order to determine whether any of the jurisdiction's minority groups appear underrepresented in the City of Yuma's HUD-funded programs, Root analyzed CAPERs from the past three years (2017, 2018, 2019) and compared the race and ethnicity of beneficiaries to the overall county population. Figure IV-2 provides a summary of this analysis by race and ethnicity. This analysis suggests that:

- Black or African American residents are overrepresented in CDBG beneficiaries compared to their share of the city's population.
- American Indian or American Native residents are overrepresented in CDBG funded projects compared to the population overall.
- Hispanic residents are overrepresented as HOME program beneficiaries.

- Finally, Asian and non-Hispanic White residents are underrepresented in CDBG and HOME funded programs compared to the population overall.

**Figure IV-2.**  
**CDBG and HOME Program Beneficiaries by Race and Ethnicity, City of Yuma, 2017-2019**

Race or Ethnicity of Beneficiaries	CDBG		HOME		Share of Population
	#	%	#	%	%
<b>White</b>	6,488	78%	38	100%	85%
<b>Black or African American</b>	441	5%	0	0%	2%
<b>Asian</b>	46	1%	0	0%	2%
<b>American Indian or American Native</b>	1,288	15%	0	0%	2%
<b>American Indian/Alaskan Native &amp; White</b>	24	0%	0	0%	N/A
<b>Other multi-racial</b>	19	0%	0	0%	9%
<b>Total</b>	8,314	100%	38	100%	
<b>Hispanic</b>	5,041	61%	37	97%	60%
<b>Not Hispanic</b>	3,273	39%	1	3%	40%

Source: 2017-2019 City of Yuma CAPERs, 2019 ACS 1-year estimates

*SECTION V.*

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IMPEDIMENTS AND FAIR HOUSING ACTION PLAN

# Section V. Impediments and Fair Housing Action Plan

This section of the Yuma AI discusses fair housing impediments, examines past fair housing goals and how they have been achieved, and proposes a fair housing action plan for the 2021-2025 Consolidated Plan period.

## 2016 Impediments to Fair Housing Choice—Do They Remain?

The impediments found in the 2016 AI included the following. The comments in italics discuss if the impediments were also found in the current AI.

### **Impediment No. 1. Persons with disabilities face barriers to housing choice.**

The 2016 AI discusses barriers to housing choice and access to opportunity for persons with disabilities. Barriers to housing choice that were identified through that analysis include:

- Refusal of landlords to make reasonable accommodations when requested;
- Lack of housing with integrated services for persons with disabilities;
- General lack of assisted, accessible housing near supportive services; and
- Difficulty accessing public transportation due to insufficient sidewalks and inaccessible bus stops.

*Barriers to housing choice for residents with a disability are still prevalent in the City of Yuma. Survey respondents and focus group attendees indicated a general reluctance to request repairs by landlords for fear of losing housing, lack of accessible services, and difficulty using public transportation and infrastructure such as sidewalks.*

### **Impediment No. 2. Disparities in access to educational enrichment activities can prevent low income children from accessing opportunity.**

A frequent challenge to opportunity raised during the community input process was the lack of sports and educational enrichment activities for low income youth. Current enrichment activities are largely privately provided and, as such, are cost prohibitive for low income families. In addition, there is no transportation option for low income children with working parents—many of whom work in the fields—to access the activities that do exist. Recent academic research has demonstrated a link between participation in certain enrichment activities and higher educational attainment and greater lifetime earnings.

*The City of Yuma has actively pursued the expansion of sports and educational enrichment activities for low income youth since the previous AI. CDBG funds allowed for the expansion of ballet for homeless youth and nonprofit partnerships allowed for summer programming. However, these programs were limited or canceled in the last year due to the COVID-19 pandemic.*

**Impediment No. 3. High poverty areas are burdened with poor quality housing, high crime, environmental hazards, and inadequate streets and sidewalks.** Concerns about the poor quality of housing and neighborhood conditions in high poverty neighborhoods were raised frequently throughout the study, in the resident and stakeholder surveys, in public meetings and in focus groups and key person interviews. Some, but not all, of these areas also have concentrations of Hispanic residents. The primary effect of these conditions on Yuma residents is in creating barriers for neighborhood youth to access opportunity—and in residents feeling safe in their neighborhood.

*Concerns over concentrated areas of crime, poverty, poor quality housing, and inadequate infrastructure remain in the City of Yuma.*

**Impediment No. 4. Fair housing education and enforcement could be improved.** Most residents who responded to a survey for this AI said they would take action if they felt they had been discriminated against. Seventeen percent said they would “do nothing.” The persistence of discrimination, evidenced by complaints, testing and the perception of residents’ experiences finding housing, underscores the importance of fair housing education and outreach activities.

*Since the previous AI, the City of Yuma has taken actions to improve the education and outreach of their fair housing activities. The City contracted with WACOG to implement a Fair Housing Program. Unfortunately, due to the Coronavirus pandemic, many local events, including the Fair Housing festival and meetings that provide opportunities to give presentations or hand out Fair Housing information were cancelled. However, some of the housing counseling and educational programs migrated online during the pandemic. Concerted efforts should resume this year as restrictions lift.*

## **2021 Impediments to Fair Housing Choice**

This section outlines impediments to fair housing choice in the City of Yuma based on the analysis presented in the previous sections of this report including public and private barriers to housing choice, disability and access, and fair housing environment.

It is important to note that the City of Yuma has made great strides in expanding housing choice in the community and facilitating new residential development of a mixture of housing types since the last AI was conducted. Specifically,



- The city updated wastewater capacity charges to alleviate the cost burden on multifamily developers;
- The city provided significant funding for the rehabilitation of public housing; and
- The city reached a settlement with the residential developer Avenue 6E to rezone 360 acres of land and facilitate the construction of up to 1,800 affordable for sale units.
- The city has also made progress on many of the impediments identified in the previous AI. Outreach and educational campaigns about fair housing issues have ramped up in the City of Yuma, and partnerships to improve outcomes for residents have been implemented.

Fair housing areas for further investment include:

**Impediment No. 1. Persons with disabilities face barriers to housing choice.**

Consistent with the previous AI, community engagement identified barriers to housing choice for residents living with a disability including increased rates of perceived discrimination and housing instability, denials of requests for reasonable accommodations—particularly for service animals—and lack of infrastructure and supportive services to adequately serve this population.

**Impediment No. 2. Concentrations of poverty, racial and ethnic minorities, and poor housing quality persist.**

Racial and ethnic minority residents are overrepresented in publicly supported housing and the Housing Choice Voucher program, which signals that these populations are not adequately served by the private housing market in the city. Additionally, there are two census tracts within the City of Yuma that qualify as racially or ethnically concentrated areas of poverty and have high shares of the population using Housing Choice Vouchers. The resident survey identified low income households, housing subsidy recipients, and residents with a disability to be most likely to deem their home in fair/poor condition.

**Impediment No. 3. Access to homeownership is unequal among protected classes.**

Barriers to housing choice, particularly in accessing homeownership, could be interpreted as a potential fair housing barrier to ownership which disparately impacts people of color. Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. The loan denial rate among American Indian or American Natives was 12 percentage points higher than for White applicants and the denial rate among black or African American applicants was 7 percentage points higher. The proportion of high-priced loans among Hispanic households is double the proportion for Non-Hispanics (22% compared to 11%).

**Impediment No. 4. Residents find it difficult to use Housing Choice Vouchers in the region.**

Among the respondents with some type of housing subsidy, half (52%) participate in the Section 8 voucher program. Among these residents, most describe their

experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.” The most prevalent reasons tenants cited as difficult include:

- Not enough properties available,
- Voucher is not enough to cover the rent for places I want to live,
- Have a hard time finding information about landlords that accept Section 8,
- Not enough time to find a place to live before the voucher expires,
- Landlords have policies of not renting to voucher holders,
- Condition of housing does not pass Housing Quality Standards (HQS), and
- Vouchers require utilities be included in the rental rate.

**Impediment No. 5. Zoning and land use regulations could be improved to better facilitate housing choice.** The lack of “missing middle” housing—duplex, triplex, townhome products and accessory dwelling units being allowed throughout the city—creates a product bottleneck and keeps families who could own as renters.

Over the past two decades, housing development has been dominated by single family. Zoning and land use regulations in the city and especially the county limit the future multifamily and missing middle housing development potential and, as such, may create barriers to the construction of affordable housing. Section II provides detailed recommendations to ensure zoning and land use regulations promote inclusive development.

**Impediment No. 6. Discrimination in rental housing persists.** Fair housing testing by the Southwest Fair Housing Council indicates discrimination in rental housing transactions is prevalent in the City of Yuma. For more information about discrimination and enforcement under the FHAA see Section IV.

## **Fair Housing Action Plan**

The recommended fair housing action plan (FHAP) for the city follows. These action items focus on what the City of Yuma can reasonably do to address the impediments and affirmatively further fair housing (AFFH) given its staff and financial capacity. Other public entities, nonprofit, and private sector partners can play a role and buttress the city’s AFFH activities.

The action plan is contained in the matrix on the following page, which links the action items to the identified impediments, potential partners, timeline and outcomes.

**Figure V-1.  
Fair Housing Action Plan**

# Fair Housing Actions	Fair Housing Issues/Impediments	Responsible Party	Metrics and Milestones
<p><b>1</b> Maintain a regular 10-year schedule for updating the City of Yuma and Yuma County General Plans and corresponding zoning and land use regulations.</p>	<p>Zoning and land use regulations limit housing choice, Access to homeownership is unequal among protected classes, Persons with disabilities face barriers to housing choice</p>	<p>City of Yuma and Yuma County</p>	<p>Consider the land use recommendations presented in the Public and Private Barriers to Fair Housing Choice section of this AI.</p> <p>Based on a 10-year update schedule the City of Yuma and Yuma County are due for updates based on the following milestones: (last updated/update due) - City of Yuma 2012/2022 - Yuma County 2012/2022</p>
<p><b>2</b> Collaborate with the Southwest Fair Housing Council to continue and expand fair housing testing efforts in the City of Yuma.</p>	<p>Discrimination in rental housing persists</p>	<p>City of Yuma and Southwest Fair Housing Council</p>	<p>Develop a schedule for fair housing testing and reporting. File allegations of fair housing violations with HUD.</p>
<p><b>3</b> Consider bridge financing or a utility fund to support residents with Housing Choice Vouchers in finding landlords to accept vouchers. Bridge financing or a utility fund could be used by voucher holders to guarantee utility payments to landlords who do not traditionally include utilities in rent.</p>	<p>Residents find it difficult to use housing choice vouchers in the city</p>	<p>City of Yuma and HACY</p>	<p>Research best practices for implementation of bridge financing or utility funds in other communities. Identify potential funding sources for the program.</p>
<p><b>4</b> Advocate for source of income protections in the state legislature and locally.</p>	<p>Residents find it difficult to use housing choice vouchers in the city</p>	<p>City of Yuma, HACY, and Southwest Fair Housing Council</p>	<p>Support source of income protection legislation at the state level. Consider adopting source of income protections locally.</p>

## Fair Housing Action Plan Continued

# Fair Housing Actions	Fair Housing Issues/Impediments	Responsible Party	Metrics and Milestones
<p><b>5</b> Expand landlord training on fair housing issues and provide technical assistance in granting reasonable accommodations as well as funding for reasonable accommodations for residents living with a disability and the Housing Choice Voucher program.</p>	<p>Residents find it difficult to use housing choice vouchers in the city, Persons with disabilities face barriers to housing choice</p>	<p>City of Yuma, HACY, and Southwest Fair Housing Council</p>	<p>Develop and deliver at least two technical assistance trainings for landlords per year. Focus topic areas on granting reasonable accommodations and the HCV program.</p>
<p><b>6</b> Prioritize sidewalks and accessible infrastructure in the city's capital improvement plan to provide residents living with a disability equal access to opportunity in the community.</p>	<p>Persons with disabilities face barriers to housing choice</p>	<p>City of Yuma</p>	<p>Evaluate areas of the city that require accessibility improvements, particularly sidewalks. Prioritize the improvement of accessible infrastructure in the CIP.</p>
<p><b>7</b> Collaborate with partners to provide targeted homeownership programs including down payment assistance, financial literacy training, and actively discourage the use of predatory lending products, particularly among the most vulnerable populations in the community identified in this AI.</p>	<p>Access to homeownership is unequal among protected classes</p>	<p>City of Yuma, HACY, and Southwest Fair Housing Council</p>	<p>Explore possible funding sources to determine the development of an affirmative marketing plan and plan to provide homeowner assistance with forms/applications targeting under-represented residents. Identify lead organizations to act as the host for financial literacy training and develop a suite of recourses that address the city's specific needs.</p>
<p><b>8</b> Expand the geographic reach of the rental inspection programs to ensure the health, safety, and welfare of residents, particularly in low income areas. Institute a rental licensing program to collect data, enforce building code regulations, and maintain a regular inspection schedule. In tandem, provide increased technical assistance and funding for the rehabilitation of rental units in the city.</p>	<p>Persons with disabilities face barriers to housing choice, Concentrations of poverty, racial and ethnic minorities, and poor housing quality persist, Residents find it difficult to use Housing Choice</p>	<p>City of Yuma and HACY</p>	<p>Leverage the existing rental inspection program to assess the potential for expansion into other low income areas. Research and consider developing a rental licensing program for all rental units. Develop technical assistance for landlords with the adoption of increased rental inspections and provide resources for rehabilitation of properties.</p>

*APPENDIX A.*

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COMMUNITY ENGAGEMENT FINDINGS

# APPENDIX A.

## Community Engagement Findings

This section reports the findings from the community engagement conducted to support the Housing Market Analysis, Five-year Consolidated Plan, and Analysis of Impediments to Fair Housing Choice. It explores residents' housing choices and preferences, challenges and experiences with displacement and housing discrimination, and access to opportunity. The Root team is grateful to the residents who shared their experiences and perspectives with fair housing and access to opportunity by participating in the resident survey, and resident and stakeholder focus groups.

### Primary Findings

The community engagement process provides insight into residents' experience with housing choice and access to economic opportunity, the impacts of the COVID pandemic, and residents' perceptions of the types of housing most needed in the county.

### Housing problems

- More than two in five (44%) low income households and 37 percent of renters deem their home to be in fair/poor condition. Among protected classes, residents with a disability are most likely to have housing condition issues. In the tight rental market, residents and stakeholders describe a reluctance to request repairs, mostly out of gratitude to have a place to live, while noting some tenants fear rent increases or other retaliation.
- Many households struggle to pay their utility bills each month, including one in four households that include a member with a disability.
- Hispanic respondents are more than twice as likely as non-Hispanic White respondents to say their home is too small for their family (11% v. 4%). Overall, more than one in 10 respondents have friends or family living with them due to a lack of housing that meets their needs. One-third of multigenerational households are doubled-up by necessity rather than preference.
- Of the respondents whose household includes a member with a disability, 92 percent have accessibility needs in the home or to access the home. More than one in four (28%) live in a home that does not meet the accessibility needs of their household member with a disability.

## **Desire to own a home**

- Yuma County has a culture of homeownership, and most renters (92%) want to own. Rising costs coupled with rising rents increasingly make homeownership seem out of reach; two in five renters who want to buy cannot afford a downpayment and one in four cannot qualify for a mortgage.
- Lack of affordably priced homes is also a significant barrier to homeownership in Yuma County.

## **Displacement and discrimination**

- In the last five years, two in five renters experienced displacement—having to move when they did not want to move. Half of low income households and 43 percent of Limited English Proficiency (LEP) respondents were displaced. In addition to personal reasons such as divorce or other household changes, the primary drivers of displacement are rents increasing more than the tenant could pay, insufficient income to pay the rent due to job loss or reductions in hours, the owner selling the home, and inability to pay utilities. Pre-COVID, eviction due to failure to pay the rent or rules violations played a small role in displacement (4% and 2% respectively).
- About one in five Non-Hispanic, non-White respondents (Other Minority), low income households, and households that include a member with a disability experienced housing instability in the past five years, compared to 7 percent of all respondents.
- Other Minority respondents are most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic). Renters, low income households, and households that include a member with a disability, and those who are currently precariously housed all believe they experienced housing discrimination at rates at least twice that of survey respondents overall.

## **Access to economic opportunity**

- With respect to access to opportunity, some of the most common challenges include inadequate pedestrian infrastructure in the Balance of County and lack of employment opportunities, especially in South County.
- Somerton residents are three times as likely as other respondents to note that there are “no or few grocery stores in the area.”
- Multigenerational households and those that include a member with a disability are twice as likely as other respondents to think their “neighborhood does not have safe places for children to play outside” (20% v. 11%).

## **COVID housing impacts**

- Based on the resident and stakeholder focus groups, it is clear that the pandemic has taken a serious toll on Yuma County residents, but especially among the Spanish-speaking community and those employed in agriculture.
- Overall, three in 10 renters report they are behind on the rent due to economic disruptions from the pandemic. The share of renters who are in arrears is highest among renters living in Somerton (48%) followed by San Luis renters (37%).

## **Housing types and appetite for density**

- Overall, Yuma County residents believe it is important that the housing market includes a diversity of housing types. Starter homes to buy, starter apartments to rent, and housing for middle income families are among the most important housing types rated by renters and those who are currently precariously housed. Larger homes suitable for large families or multigenerational living are considered to be in short supply, based on the survey and resident focus groups.
- Within the city of Yuma, residents are generally supportive of gentle infill products like duplexes, townhomes, small apartment buildings (less than 9 units), and small homes on small lots, but less so “in my neighborhood.” Renters and low and moderate income households are most likely to consider duplex homes and townhomes to be appropriate in their neighborhood. Support for accessory dwelling units “in my neighborhood” doubles if the occupants are restricted to family members.

## **South County differences**

- Throughout the community engagement process, South County stakeholders and residents emphasized the cultural and economic differences between South County communities and the city of Yuma and northern Yuma County. Among these differences are South County’s strong economic, social, and cultural ties with Mexico, employment concentrated in agriculture, and the lack of focus on housing issues in South County from County commissioners as well as local elected officials in San Luis, Somerton, and Wellton. Recognizing these differences and incorporating them into countywide plans is critical to successfully responding to South County resident needs.

## **Community Engagement Elements**

The community engagement process included:

- A resident survey available in English and Spanish (1,188 total responses, 281 in Spanish);
- Two online community meetings;
- A focus group with residents with serious mental illness;



- A focus group with Spanish-speaking residents of San Luis;
- Two focus groups with affordable and market rate housing developers and providers;
- A focus group with Mission staff and guests;
- A focus group with social service providers; and
- A focus group with city of Yuma staff.

**Explanation of terms.** The terms used throughout this section include:

- “Precariously housed” includes residents who are currently homeless or living in transitional or temporary/emergency housing and residents who are “staying with friends/family” —people who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household exchange for housing (e.g., childcare, healthcare services).
- “Disability” indicates that the respondent or a member of the respondent’s household has a disability of some type—physical, mental, intellectual, developmental.
- “Multigenerational” indicates households that include adult family members other than the respondent or the respondent’s spouse or partner.
- “Housing subsidy” refers to a respondent whose household’s housing costs are subsidized by a housing voucher (e.g., Section 8/Housing Choice Voucher) or whose household lives in a building where their rent is based on their income. This includes LIHTC buildings, project-based Section 8, deed-restricted ownership products, and any other place-based housing subsidies.

**Geographic note.** Throughout this section, survey data reported for Yuma County include residents of the cities of Yuma, Somerton, San Luis, Wellton. Data reported for Balance of County includes all residents of unincorporated areas and the four residents of Wellton who responded to the survey. References in the text to “South County” include San Luis, and Somerton and the unincorporated areas south of the City of Yuma, extending to the border.

**Sampling note.** The survey respondents do not represent a random sample of the Yuma County. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results however, with an understanding of the differences of the sample from the larger population. Overall, survey respondents are demographically

similar to Yuma County, with the exception that survey respondents skew younger and represent a higher share of 45 to 64 year olds than those age 65 and older.

Compared to the county's overall demographic and socioeconomic characteristics, survey respondents:

- Are as likely to be Hispanic (60% in the survey v. 60% in the county);
- As likely to be homeowners (69% v. 66%)
- Are more likely to have children under 18 (56% v. 31%)
- Have a lower median household income (\$25,000 up to \$50,000); and
- More likely to be ages 45 to 64 (43% v. 25%).

**Figure A-1.**  
**Survey Respondent Profile**

Resident Survey Sample Sizes	San Luis	Somerton	Yuma	Balance of County	Yuma County (Total)
<b>Total Responses</b>	<b>190</b>	<b>106</b>	<b>794</b>	<b>98</b>	<b>1,188</b>
<b>Household Composition</b>					
<b>Households with children under 18</b>	76	45	307	26	454
<b>Multigenerational households</b>	34	23	98	15	170
<b>Households with a member with a disability</b>	18	7	102	15	142
<b>Race/Ethnicity</b>					
<b>Hispanic</b>	131	74	254	16	475
<b>Other Non-Hispanic Minority</b>	1	1	36	4	42
<b>Non-Hispanic White</b>	4	1	214	45	264
<b>Tenure</b>					
<b>Homeowner</b>	104	69	515	73	761
<b>Renter</b>	46	21	169	14	250
<b>Precariously housed</b>	23	12	50	5	90
<b>Age</b>					
<b>Under 35</b>	40	28	120	6	194
<b>Ages 35 - 54</b>	59	29	248	40	376
<b>Age 55 +</b>	27	14	111	22	174
<b>Household Income</b>					
<b>&lt; \$25,000</b>	38	19	88	6	151
<b>\$25,000 up to \$50,000</b>	67	28	133	13	241
<b>\$50,000 up to \$75,000</b>	16	18	93	14	141
<b>\$75,000 up to \$100,000</b>	7	4	75	19	105
<b>\$100,000 +</b>	3	6	112	17	138
<b>Other Characteristics</b>					
<b>Housing subsidy</b>	12	10	20	2	44
<b>Member of the household is a veteran</b>	10	4	110	21	145
<b>Lives in Yuma County year-round</b>	184	104	782	97	1,167
<b>Seasonal resident</b>	6	2	12	1	21

Note: The four respondents living in Wellton are included in the Balance of County.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

The combination of the COVID pandemic and the survey timing resulted in a sample comprised primarily of year-round residents of Yuma County (98% of respondents).

**Sample size note.** When considering the experience of members of certain groups in Yuma County, the sample sizes are too small (n<40 respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those

who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

**Framework for presenting results.** Findings from the survey are summarized for segments of the respondent population—e.g., income range, household characteristics—where sample sizes are sufficient for reporting.

**Survey timing and COVID pandemic.** It is important to note that the resident survey that was conducted during fall 2020. As such, the survey primarily reflects mid-pandemic economic impacts and seasonal economic conditions of year-round residents. The housing situation and needs of residents during that period can help inform short- and long-term policy responses to stabilize households and preserve and add to the supply of affordable housing.

## Current Housing Choice

This section explores Yuma County residents' current housing situation, ranging from the most important factors influencing their current housing choice, their assessment of their home's condition, and housing-related challenges. To the extent possible, survey data are reported for each jurisdiction and by selected respondent or household characteristics (e.g., housing situation, income, demographics).

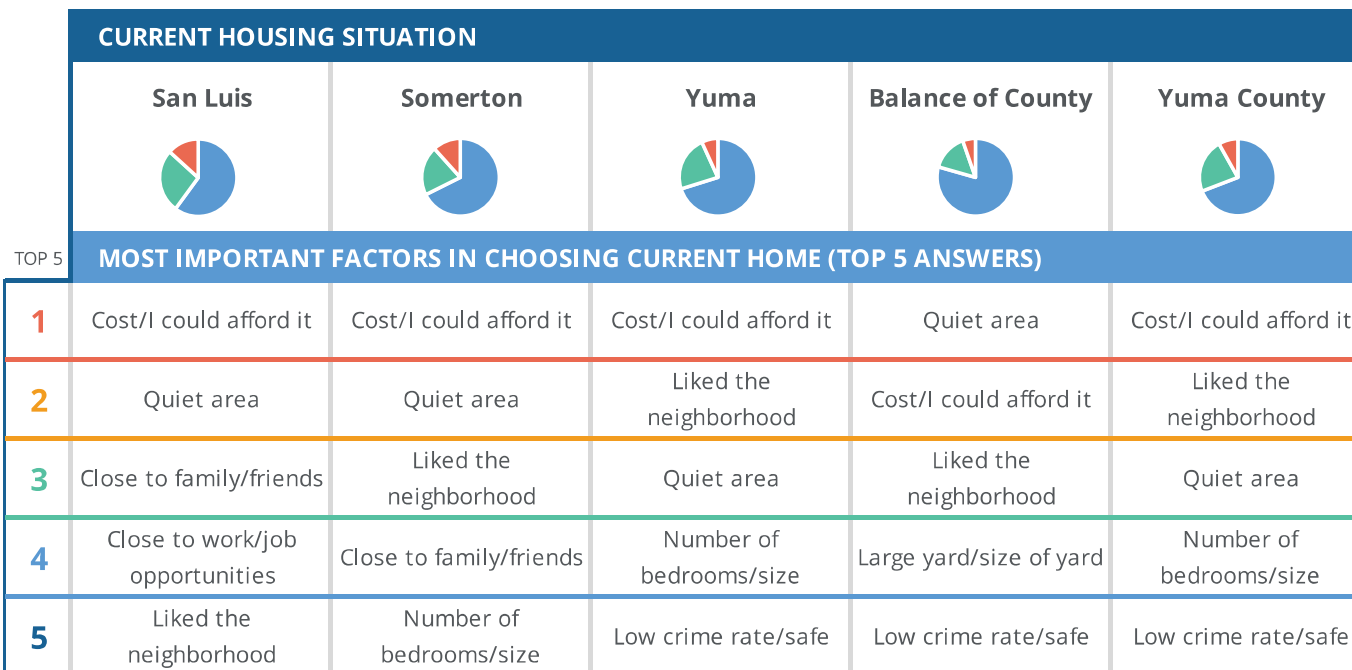
**Most important factors in choosing current home.** Figures A-2 through A-4 present the top five factors survey respondents considered when choosing their current home. Not surprisingly, cost is the factor selected by the greatest proportion of survey respondents with a few exceptions—the greatest proportion of:

- Higher income households selected their home because they “liked the neighborhood”;
- Balance of County residents, those who are precariously housed, and respondents with LEP prefer a “quiet area”; and
- Respondents with a housing subsidy selected “landlord takes Section 8.”

Other factors in the top five common across jurisdictions and respondent types include being close to family or friends, the number of bedrooms, and low crime/safe. Hispanic households and households with children valued being close to quality public schools.

**Figure A-2.**  
**What factor was most important to you when you chose your current home? Top Five Responses by Jurisdiction**

■ Homeowner   
 ■ Renter   
 ■ Precariously Housed



Source:  
 Root Policy Research from the 2020  
 Yuma County Resident Housing  
 Choice Survey.

**Figure A-3.**

**What factor was most important to you when you chose your current home?**

**Top Five Responses by Tenure and Income**

■ Homeowner   
 ■ Renter   
 ■ Precariously Housed

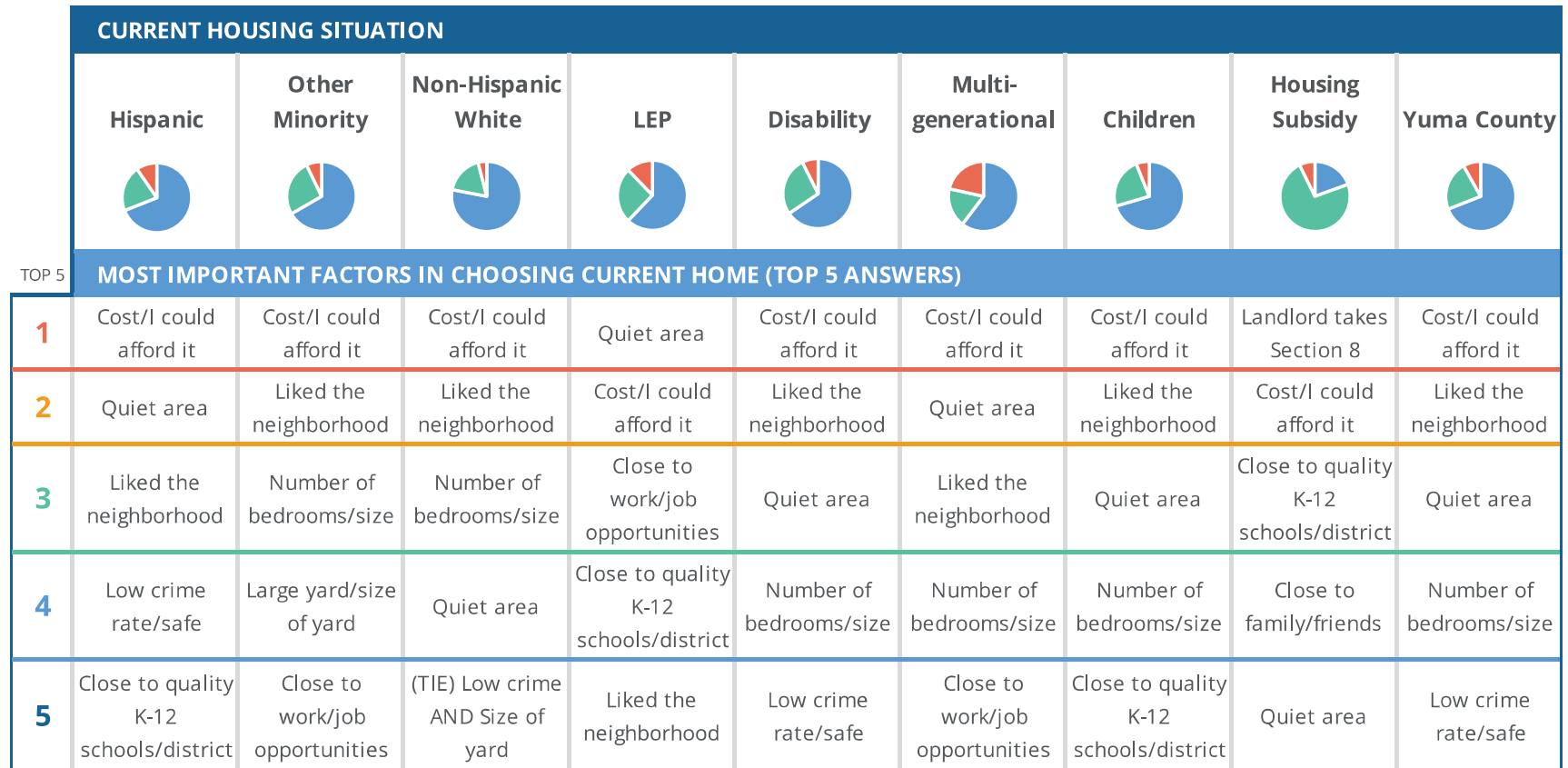
CURRENT HOUSING SITUATION									
	Homeowner	Renter	Precariously Housed	Income < \$25,000	Income \$25,000 up to \$50,000	Income \$50,000 up to \$75,000	Income \$75,000 up to \$100,000	Income > \$100,000	Yuma County
TOP 5	MOST IMPORTANT FACTORS IN CHOOSING CURRENT HOME (TOP 5 ANSWERS)								
1	Cost/I could afford it	Cost/I could afford it	Quiet area	Cost/I could afford it	Cost/I could afford it	Cost/I could afford it	Liked the neighborhood	Liked the neighborhood	Cost/I could afford it
2	Liked the neighborhood	Number of bedrooms/size	Close to family/friends	Quiet area	Quiet area	Quiet area	Quiet area	Cost/I could afford it	Liked the neighborhood
3	Quiet area	Quiet area	Cost/I could afford it	Close to work/job opportunities	Liked the neighborhood	Liked the neighborhood	Low crime rate/safe	Number of bedrooms/size	Quiet area
4	Low crime rate/safe	Liked the neighborhood	Low crime rate/safe	Close to family/friends	Low crime rate/safe	Number of bedrooms/size	Cost/I could afford it	Quiet area	Number of bedrooms/size
5	Number of bedrooms/size	Close to work/job opportunities	Liked the neighborhood	Liked the neighborhood	Number of bedrooms/size	Large yard/size of yard	Large yard/size of yard	Low crime rate/safe	Low crime rate/safe

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-4.**

**What factor was most important to you when you chose your current home?  
Top Five Responses by Selected Respondent Characteristics**

■ Homeowner   
 ■ Renter   
 ■ Precariously Housed



Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

In a focus group with residents with mental illness, including those in recovery from substance use disorders, participants described being very happy to live on their own—most were formerly homeless. They describe feeling safer living in secure apartment buildings and, if available, they like having extra security such as neighborhood watch, having a dog, and being able to have locked gates to their building's property. For these residents, housing choice is a misnomer—most took the first available apartment that would accept their housing voucher, which requires utilities to be included in the rent.

Participants in the Spanish-language San Luis resident focus group like their neighborhoods and enjoy the small town and the tranquility. There are not a lot of housing options and they tend to be on the smaller side. They enjoy their community, their neighbors, and school options. There is a general perception that a smaller town will provide better options for family life and to raise children.

**Housing condition.** The majority (80%) of survey respondents consider their home to be in good or excellent condition. Figures A-5 presents the proportion of respondents who rate their home's condition as "fair" or "poor."

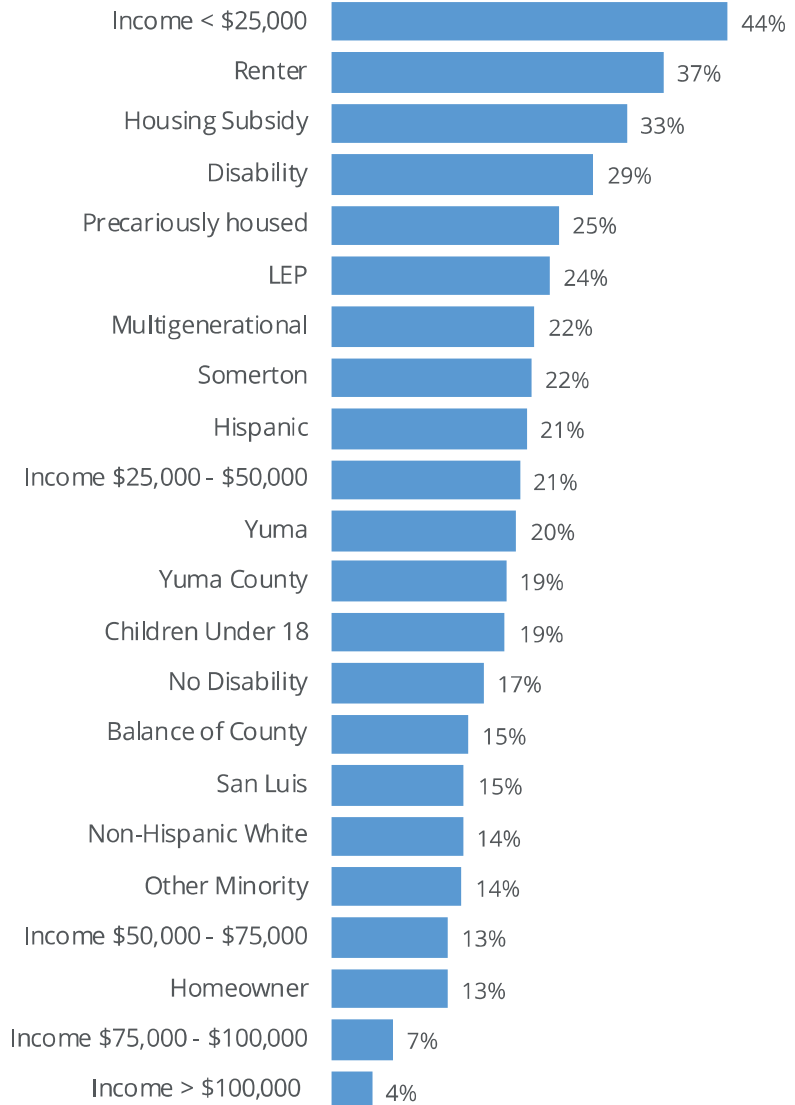
- More than two in five (44%) low income households and 37 percent of renters deem their home to be in fair/poor condition.
- One in three (33%) housing subsidy recipients live in fair/poor condition homes, as do 29 percent of households that include a member with a disability.
- Homeowners and higher income households are least likely to identify their home's condition as being fair or poor.

About 70 percent of respondents with homes they consider to be in fair or poor condition have repairs that need to be made. The most common needed repairs are to the roof, bathroom plumbing, flooring, kitchen appliances, kitchen plumbing, and to cooling systems. In most cases, the repairs have not been made because the homeowner "can't afford to make them" or because the landlord "refuses to make repairs."



**Figure A-5.**  
**How would you rate the condition of your home? (% Fair/Poor)**

Source:  
 Root Policy Research from the 2020  
 Yuma County Resident Housing  
 Choice Survey.



Similar to survey respondents, many of the renters who participated in focus groups described living in housing in fair or poor condition, including those with housing vouchers. It was not uncommon for participants in the focus group with residents with disabilities to share that landlords refuse to make repairs. These residents described feeling uncomfortable asking for repairs, and this was especially true of participants transitioning out of homelessness. Some landlords charge for repairs and there are waitlists for repairs as well. A participant noted that after living under substandard conditions she contacted Achieve and they handled the situation and helped her find a better place. Most participants just put up with the lack of maintenance and repairs, thinking that they should be grateful for having a place to live, or worry that if they ask for repairs their rent will increase.

**Housing challenges.** Survey respondents reviewed 16 common housing challenges and indicated if they currently experience a challenge. Overall, nearly half (59%) of Yuma

County survey respondents noted that they do not experience any of the housing challenges—homeowners and higher income households were much less likely to experience housing challenges. Conversely, more than three in four renters and 82 percent of households with incomes less than \$25,000 experience housing challenges. Figures A-6 through A-8 present the seven most common housing challenges experienced by Yuma County residents. These include the desire to buy a home, worrying about rent going up to an amount they can't afford, struggling to pay utilities, and living in crowded conditions.

- Nearly two in five (37%) renters want to buy a home but can't afford the downpayment, and 27 percent can't qualify for a mortgage loan;
- One in five renters (18%) and one in five low income households (22%) struggle to pay their utilities;
- One in six (17%) low income households live in a home that is not big enough for their household, and one in five (20%) want to get their own place but can't afford it.
- Compared to non-Hispanic White respondents, respondents who are Hispanic are more likely to experience housing challenges, including wanting to buy a home but not being qualified for a mortgage (13% v. 7%), struggling to pay utilities (11% v. 6%), and living in crowded conditions (11% v. 4%).
- Households that include a member with a disability, multigenerational households, and housing subsidy recipients are more likely to experience housing challenges. Nearly one in four (23%) households that included a member with a disability struggle to pay their utilities, compared to one in 10 (9%) Yuma County respondents overall.

Examples of housing challenges described by respondents include:

- *"Adding handicapped accessibility features to home." (Resident survey respondent)*
- *"I couldn't find anything that was in the price range that I was provided with, so I had to stay where I am at, when I wanted something better for my children." (Resident survey respondent)*
- *"Esta subiendo el pago cada año empeze en \$520 y ahora estamos en \$950." The payment is going up every year. I started at \$520 and now it is \$950. (Resident survey respondent)*
- *"I have lived in the home 23 years, just divorced, kids out of the house. Staying is the most cost effective option at this time but I worry about the future and being able to maintain or being able to downsize and accessibility in my Senior years." (Resident survey respondent)*
- *"I struggle to refinance due to appraisals being too low and not accurate." (Resident survey respondent)*

- *“My home needs a lot of repairs. But, it is very costly and I cannot afford it.” (Resident survey respondent)*
- *“My property manager refuses to replace broken appliances or properly address maintenance issues. He tells me to move out if I'm unhappy with the house. My refrigerator is leaking coolant, but he won't replace it. It has been 'repaired' three times already.” (Resident survey respondent)*
- *“We want to live out in town, versus on the Military base, but the cost of housing (purchasing or renting) is ridiculously high.” (Resident survey respondent)*

**Figure A-6.  
Top Housing  
Challenges by  
Jurisdiction**

Higher than Region (>5 percentage points)  
Lower than Region (<5 percentage points)

Source:  
Root Policy Research from the 2020  
Yuma County Resident Housing  
Choice Survey.

Housing Challenge	San Luis	Somerton	Yuma	Balance of County	Yuma County
None of the these challenges	41%	45%	50%	62%	49%
I want to buy a house but can't afford the down payment	12%	13%	12%	11%	12%
I want to buy a house but can't qualify for a mortgage loan	13%	11%	9%	5%	9%
I worry about my rent going up to an amount I can't afford	13%	10%	8%	4%	9%
I struggle to pay my utilities	11%	7%	9%	5%	9%
My home isn't big enough for my family members	8%	12%	7%	7%	8%
I struggle to pay my rent/mortgage	6%	9%	8%	4%	7%
I want to get my own place/live with fewer people, but I can't afford it	11%	7%	5%	3%	6%

**Figure A-7.**  
**Top Housing Challenges by Tenure and Income**

Higher than Region (>5 percentage points)  
 Lower than Region (<5 percentage points)

Housing Challenge	Homeowner	Renter	Precariously Housed	Income < \$25,000	Income \$25,000 up to \$50,000	Income \$50,000 up to \$75,000	Income \$75,000 to \$100,000	Income > \$100,000	Yuma County
None of the these challenges	65%	22%	28%	18%	50%	64%	77%	82%	49%
I want to buy a house but can't afford the down payment	-	37%	32%	30%	12%	13%	8%	1%	12%
I want to buy a house but can't qualify for a mortgage loan	-	27%	26%	28%	11%	6%	1%	1%	9%
I worry about my rent going up to an amount I can't afford	-	24%	13%	23%	12%	6%	3%	1%	9%
I struggle to pay my utilities	6%	18%	3%	22%	12%	6%	2%	2%	9%
My home isn't big enough for my family members	7%	12%	3%	17%	9%	9%	4%	3%	8%
I struggle to pay my rent/mortgage	6%	13%	9%	16%	11%	6%	2%	1%	7%
I want to get my own place/live with fewer people, but I can't afford it	1%	14%	33%	20%	6%	4%	1%	1%	6%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-8.**  
**Top Housing Challenges by Selected Respondent Characteristics**

Higher than Region (>5 percentage points)  
 Lower than Region (<5 percentage points)

Housing Challenge	Hispanic	Other Minority	Non-Hispanic White	LEP	Disability	Multi-generational	Children	Housing Subsidy	Yuma County
None of the these challenges	48%	60%	69%	37%	39%	42%	51%	23%	49%
I want to buy a house but can't afford the down payment	14%	14%	12%	13%	18%	18%	15%	39%	12%
I want to buy a house but can't qualify for a mortgage loan	13%	7%	7%	14%	15%	18%	12%	30%	9%
I worry about my rent going up to an amount I can't afford	12%	5%	6%	17%	15%	15%	10%	23%	9%
I struggle to pay my utilities	11%	12%	6%	8%	23%	15%	13%	18%	9%
My home isn't big enough for my family members	11%	12%	4%	10%	17%	14%	13%	16%	8%
I struggle to pay my rent/mortgage	9%	5%	7%	9%	15%	11%	11%	11%	7%
I want to get my own place/live with fewer people, but I can't afford it	9%	10%	4%	8%	8%	11%	6%	9%	6%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

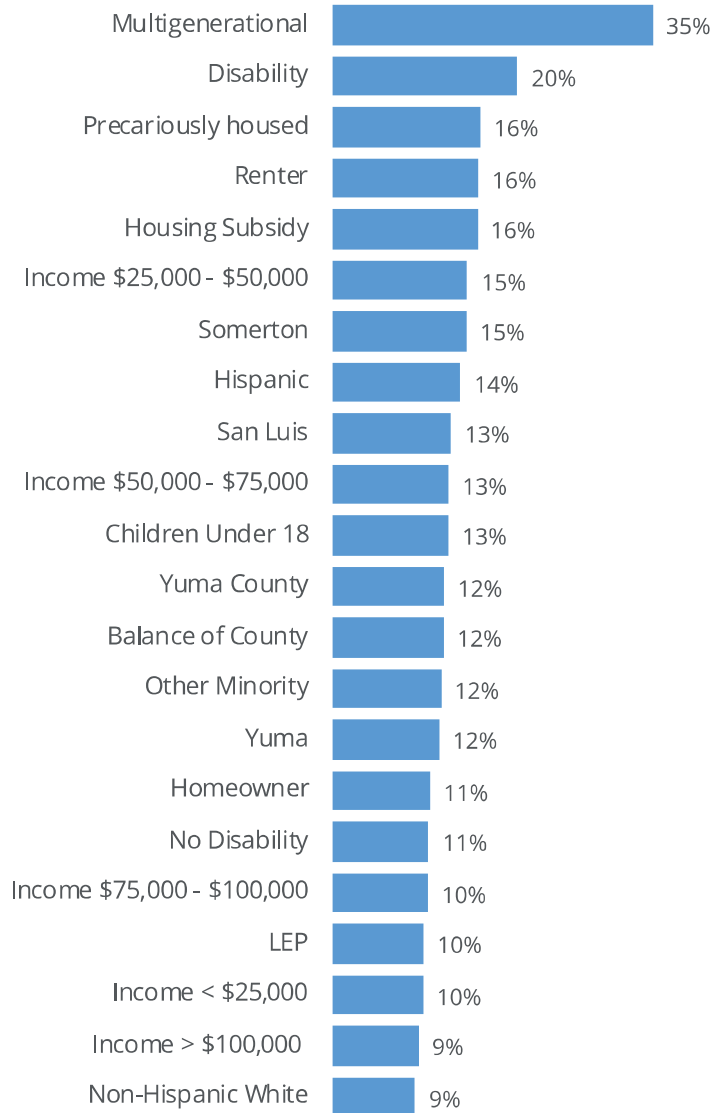
**Lack of housing to rent or buy.** Stakeholder and resident focus group participants characterized Yuma County's housing market as lacking both affordable housing to buy and to rent. In particular, they described a significant deficit in the number of rental units affordable to low income households.

- *"I get calls weekly looking for emergency housing units. Unfortunately, we don't have any of those. We review the waitlist for all multifamily complexes every three or four months, and the waiting lists are ridiculous. Every two years, we have to purge but we have 2 to 3 years on the waitlist for families, especially in Somerton."* (South County stakeholder focus group participant)

**Doubling up.** Among Yuma County survey respondents, 12 percent report that they have friends or family living with them due to a lack of housing that meets their friend or family member's needs. As shown in Figure A-9, one in three multigenerational households (35%) are doubled up, while the majority are multigenerational households by preference. Households that include a member with a disability second most likely to be doubled up (20%), followed by renters, those who are precariously housed, and residents with a housing subsidy.

**Figure A-9.**  
**Do any of your**  
**friends/relatives live**  
**with you due to lack**  
**of housing that**  
**meets their needs**  
**anywhere in Yuma**  
**County? (% Yes)**

Source:  
 Root Policy Research from the 2020  
 Yuma County Resident Housing  
 Choice Survey.

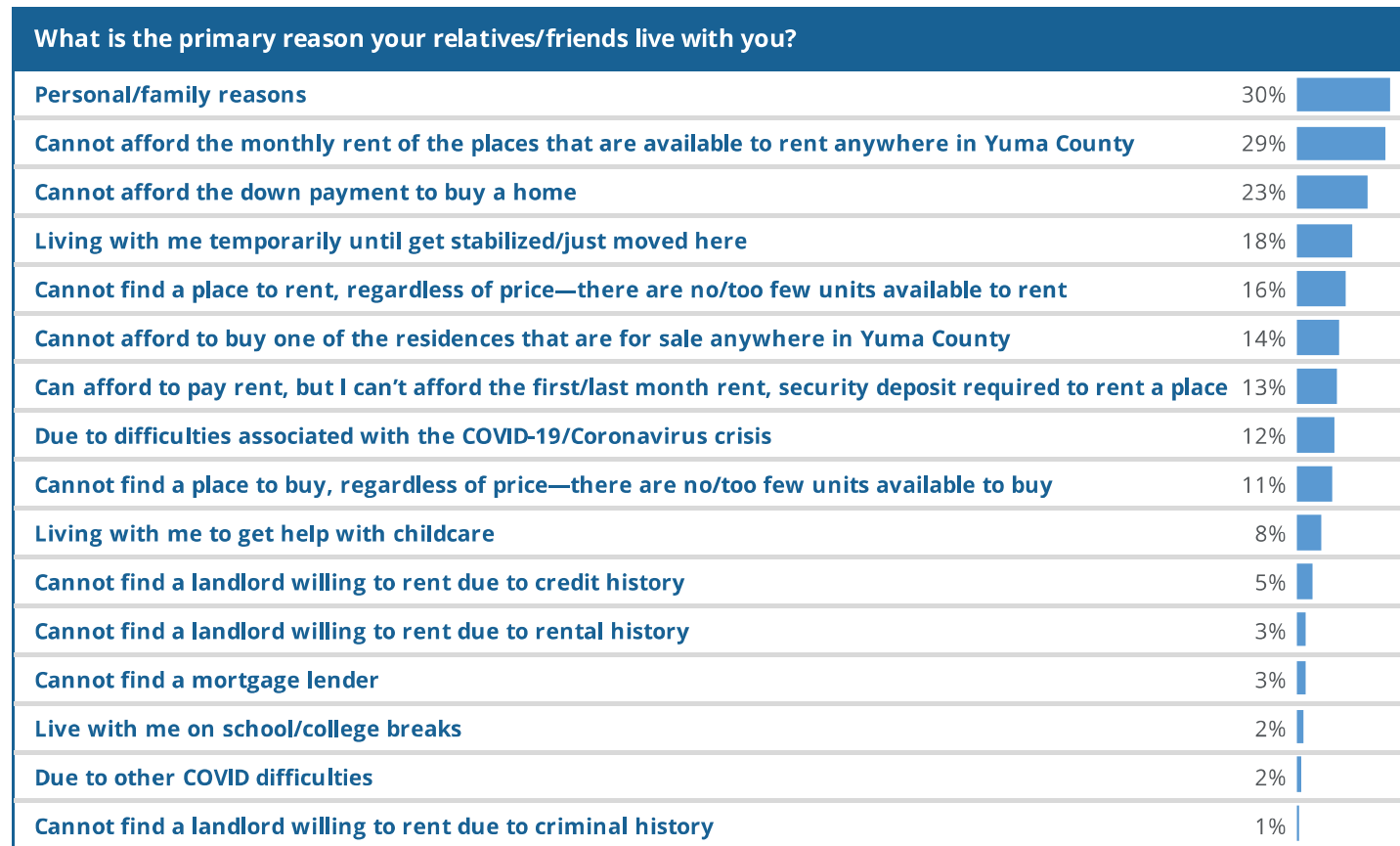




The primary reasons why friends or family are doubled-up are nearly the same across all demographic and socioeconomic groups. The reasons point to both supply of housing and housing affordability driving doubling up, but at least one in 10 doubled-up households attribute their situation to impacts from the COVID pandemic.

**Figure A-10.**  
**What is the primary reason your relatives/friends live with you?**

Source:  
 Root Policy Research from the  
 2020 Yuma County Resident  
 Housing Choice Survey.



**Difficulty using housing voucher.** Among the respondents with some type of housing subsidy, half (52%) participate in the Section 8 voucher program. Among these residents, most describe their experience trying to find a landlord to accept their voucher as “somewhat difficult” or “difficult.”

- Nearly all attributed their difficulty to “not enough properties available” and half reported that the “voucher is not enough to cover the rent for places I want to live.”
- About two in five “have a hard time finding information about landlords that accept Section 8” and three in 10 say there is “not enough time to find a place to live before the voucher expires.”
- About one in five report “landlords have policies of not renting to voucher holders,” and that the “condition of housing does not pass Housing Quality Standards (HQS).”

In a focus group with residents with disabilities, participants explained that their voucher requires them to rent units with utilities included in the rent. The purpose of the policy is to promote housing stability, as utility bills can be unaffordable, especially to extremely low income households. In their experience, only smaller landlords that own old apartment buildings offer utilities included with the rent, and these units are clustered in the older part of town, limiting the neighborhoods where these voucher program participants can live. As such, participants expressed a desire for more rentals in better neighborhoods or more modern buildings to include utilities.

**Housing costs.** Figures A-11 and A-12 compare median housing costs. As shown, median rent and mortgage vary by jurisdiction, but utilities and Internet costs are fairly similar; utility costs range from \$300 per month in the Balance of County to \$350 per month among San Luis and Somerton respondents.

**Figure A-11.  
Median Monthly  
Housing Costs by  
Jurisdiction,  
Tenure, and  
Household  
Income**

Note:

n/a = not applicable. - Sample size too small to report.

Source:

Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

	Median Rent	Median Mortgage	Median Utilities	Median Internet
<b>Jurisdiction</b>				
<b>San Luis</b>	\$600	\$800	\$350	\$75
<b>Somerton</b>	\$550	\$830	\$350	\$70
<b>Yuma</b>	\$750	\$980	\$320	\$70
<b>Balance of County</b>	\$900	\$900	\$300	\$70
<b>Yuma County</b>	\$700	\$950	\$325	\$71
<b>Tenure</b>				
<b>Homeowner</b>	n/a	\$950	\$350	\$75
<b>Renter</b>	\$700	n/a	\$300	\$70
<b>Precariously Housed</b>	\$500	n/a	\$300	\$70
<b>Income</b>				
<b>Income &lt; \$25,000</b>	\$600	\$744	\$292	\$65
<b>Income \$25,000 upto \$50,000</b>	\$705	\$800	\$350	\$75
<b>Income \$50,000 upto \$75,000</b>	-	\$900	\$325	\$75
<b>Income \$75,000 to \$100,000</b>	-	\$1,013	\$320	\$75
<b>Income &gt; \$100,000</b>	-	\$1,351	\$360	\$75

**Figure A-12.  
Median Monthly  
Housing Costs by  
Selected  
Characteristics**

Note:

n/a = not applicable. – Sample size too small to report. Samples sizes too small (<40) to report any housing costs data for Other Minority and Housing Subsidy respondents.

Source:

Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

	Median Rent	Median Mortgage	Median Utilities	Median Internet
<b>Ethnicity</b>				
<b>Hispanic</b>	\$680	\$900	\$350	\$75
<b>Non-Hispanic White</b>	\$800	\$1,000	\$325	\$71
<b>Limited English Proficient</b>				
<b>LEP</b>	\$600	\$800	\$340	\$70
<b>Not LEP</b>	\$750	\$978	\$325	\$71
<b>Disability</b>				
<b>Disability</b>	-	\$954	\$350	\$75
<b>No Disability</b>	\$725	\$956	\$325	\$70
<b>Household Composition</b>				
<b>Multigenerational</b>	\$652	\$956	\$400	\$71
<b>Children</b>	\$700	\$962	\$350	\$75

**Housing challenges—disability.** Of the respondents whose household includes a member with a disability, 92 percent have accessibility needs in the home or to access the home. **More than one in four (28%) live in a home that does not meet the accessibility needs of their household member with a disability.**

The most common improvements or modifications needed include:

- Grab bars in the bathroom;
- Alarm to notify if someone leaves the house;
- Ramps;
- Walk/roll in shower;
- Fire alarm/doorbell made accessible for person with hearing disability/deaf.

Other modifications or accommodations needed include lowering the kitchen and bathroom counters, permission to have a service or emotional support animal, reserved accessible parking by the front entrance, stair lifts, and fencing around the so that a child with disabilities does not go into the street.

**Most needed services or supports to achieve or preserve the housing situation best for a household member with a disability.** The most common suggestions for what is needed to help the person with a disability in the respondents' household live or continue to live in their preferred housing situation include:

- Accessibility modifications to the home;
- Affordable housing;
- Access to needed therapies, behavioral health services, medical care, and affordable in-home care;
- Neighborhood accessibility improvements—sidewalks, street lighting, accessible crossing signals, traffic enforcement;
- Activities, sports, and park play spaces accessible to children with disabilities; and
- Improved access to transit and improvements to bus stops, such as shade and seating.

Examples of resident comments include:

- *“More outdoor and indoor play areas. More doctors and specialists that work and support people with disabilities. Different sports and activities that support and welcome people with disabilities.” (Resident survey respondent)*
- *“My daughter is autistic and cannot share a room with her brother whom has adhd. She is sensitive to sounds and is annoyed by her brother so I need them to both have separate rooms.” (Resident survey respondent)*
- *“Ayudarla con la pavimentacion de la banqueta.” Help with paving the sidewalk. (Resident survey respondent)*
- *“We provide a home for our son with a severe mental illness. There are very limited programs for parents to purchase home for adults with mental illness. So, we have stepped up to the plate and Yuma won't have to pay for his housing. Since we refinanced our home to purchase his home, we would like to see a "goodwill finance rate," a tax credit for taking care of a mentally ill person's home, monthly reimbursement for the mortgage on his home.” (Resident survey respondent)*

**Senior housing challenges.** Throughout the community engagement process, participants raised several issues specific to the housing needs of seniors. These include both the need for an increase in the housing supply affordable to low and moderate income seniors, appropriate for seniors, as well as affordable services to help seniors maintain their health and age in place. The pandemic also exposed the need for the community to help seniors when one member of a couple becomes ill and is not able to care for their spouse during their illness.

- *“I had great difficulty helping my 80 year old mother find an affordable apartment until she could get moved into a 55 and over community.” (Resident survey respondent)*

- In a public meeting, a participant described the need for crisis response for elderly people. *“When one member of an elderly couple has dementia or some other need and can't care for themselves, the other person usually steps in and provides care for their spouse or partner. If the caregiver gets the Coronavirus or another illness and can't provide care to that person, there is no crisis response system in place into provide bridge care for them. This bridge care should provide care to them until a more permanent solution is found to provide care for them. The solution could be that an out of town family member comes to pick them up or they are approved AHCCS and can be placed in a care facility or some other type of care. Right now, this service does not exist, but organizations serving seniors and health care providers are seeing a need for it daily. So, if someone is found wandering by the police, an ambulance is called to a home by a neighbor or a vulnerable patient is released from the hospital, there needs to be a facility that they can be taken to until a more permanent solution is found to address their care.”*
- From the perspective of social service providers, a lack of senior housing is a big issue. There are not enough low income options for independent living for seniors on a fixed income. There are not enough senior-centered options or options with age-appropriate accommodations. Other concerns about senior housing include:
  - Hard to find housing in the areas that seniors want to be in. (e.g., Foothills);
  - Long waitlists for senior housing—about 18 months in South County and 24 months in the city of Yuma;
  - Need for more independent living options;
  - Growing concern about food insecurity, as there are more seniors showing up for congregant meals; and
  - A concern that more seniors are becoming homeless.

**Homelessness.** Throughout Yuma County, but especially in South County, many families are homeless, but do not meet HUD's definition of homelessness. These are the families who are couch surfing, staying with different friends or relatives each day or week. From the perspective of stakeholders, these “hidden homeless” households are predominantly Hispanic.









- *“There are some people who live with other families—a lot of families that live two or three families in one home. A lot of times they don't report that they have family with them because they have county support. There's a lot of homelessness of that nature.” (South County stakeholder focus group participant)*
- *“We have 12 units for homeless, but they're not 'registered' in HMIS. We know they are homeless, but since they live with a family and move from family to family, they don't qualify for the guidelines. Since we have the units, we struggle to get a 'homeless person' in one of the units, because they aren't meeting the requirements. Live with one family one day and the next or cross the border.” (South County stakeholder focus group participant)*

## Displacement and Recent Experience Seeking Housing

Overall, 37 percent of survey respondents report moving in the past five years, and this ranged from 24 percent of Somerton respondents to 41 percent of city of Yuma respondents.

**Displacement experience.** Residents were asked if they have been displaced from their home—had to move when they did not want to move—in Yuma County over the past five years. As shown in Figure A-13, about two in five renters who moved in the last five years were displaced. Countywide, the most common reason for displacement is “personal reasons,” which can range from divorce to changes in roommates to any number of factors related to the members of a household. Figure A-13 presents the four most common, non-personal reasons for displacement—rent increasing more than could be paid, job loss or reductions in hours (not related to COVID), the owner selling the home, or inability to pay utilities. Eviction played a small role—one in 25 (4%) of those displaced were evicted due to being behind on the rent and one in 50 (2%) were displaced due to an eviction based on a rules violation.

**Figure A-13.**  
**Displacement Experience and Reason for Displacement, Jurisdiction and Tenure**

	% of Movers Who Were Displaced	REASON FOR DISPLACEMENT			
		Rent increased more than I could pay	Lost job/hours reduced (Not due to COVID)	Owner selling home	Couldn't afford to pay utilities
<b>Jurisdiction</b>					
San Luis	 35%	-	-	-	-
Somerton	 24%	-	-	-	-
Yuma	 24%	20%	10%	10%	12%
Balance of County	 15%	-	-	-	-
Yuma County	 25%	17%	11%	16%	10%
<b>Tenure</b>					
Homeowner	 11%	-	-	-	-
Renter	 41%	17%	11%	17%	13%
Precariously housed	 39%	-	-	-	-













Note: Displacement experience did not necessarily occur in the current community of residence. - Sample size too small to report.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

As shown in Figure A-14, nearly half of low income households who moved in the last five years were displaced, as were more than two in five (43%) LEP movers. Although the

sample size of LEP movers is too small to report reasons for displacement statistically, the top reasons for displacement are very similar to other displaced residents—personal reasons, landlord selling the home, (non-COVID) job loss, and inability to pay utilities.

**Figure A-14.**  
**Displacement Experience and Reason for Displacement, by Income and Respondent Characteristics**

	% of Movers Who Were Displaced	REASON FOR DISPLACEMENT			
		Rent increased more than I could pay	Lost job/hours reduced (Not due to COVID)	Owner selling home	Couldn't afford to pay utilities
<b>Jurisdiction</b>					
Yuma County	 25%	17%	11%	16%	10%
<b>Income</b>					
< \$25,000	 48%	-	-	-	-
\$25,000 - \$50,000	 30%	-	-	-	-
\$50,000 - \$75,000	 19%	-	-	-	-
\$75,000 - \$100,000	 8%	-	-	-	-
\$100,000+	 8%	-	-	-	-
<b>Household Characteristics</b>					
Hispanic	 29%	14%	8%	18%	8%
Other Minority	-	-	-	-	-
Non-Hispanic White	 18%	-	-	-	-
LEP	 43%	-	-	-	-
Disability	 30%	-	-	-	-
Multigenerational	 34%	-	-	-	-
Children	 28%	16%	7%	16%	9%
Housing Subsidy	-	-	-	-	-

Note: Displacement experience did not necessarily occur in the current community of residence. - Sample size too small to report.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Housing instability in the past five years.** Figure A-15 presents the proportion of respondents who experienced housing instability in the past five years. Indicators of housing instability included having to move in with someone else temporarily/"couch surf," sleeping in a vehicle, temporary stays in hotels or motels or camping, staying in a homeless shelter or domestic violence shelter, or living in transitional or other temporary housing. Overall, 7 percent of respondents indicated that they had experienced some form of housing instability in the past five years, most commonly having to "couch surf." Non-

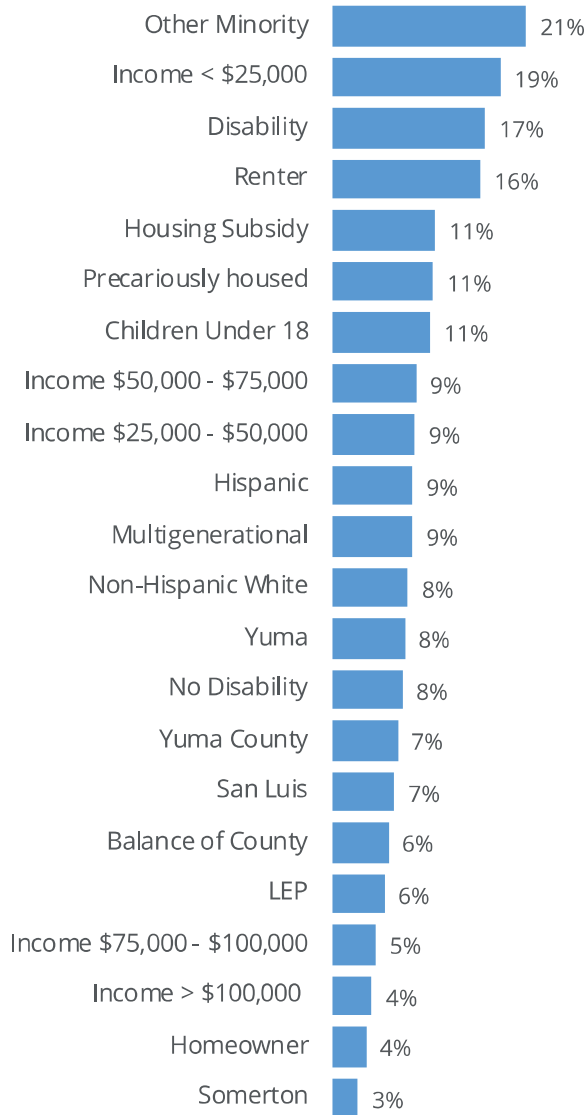


Hispanic, non-White residents (Other Minority), low income households, households that include a member with a disability, and renters in general all are more likely to have experienced housing instability than the typical Yuma County resident.

**Figure A-15.**  
**Experienced**  
**Housing Instability**  
**in the Past Five**  
**Years**

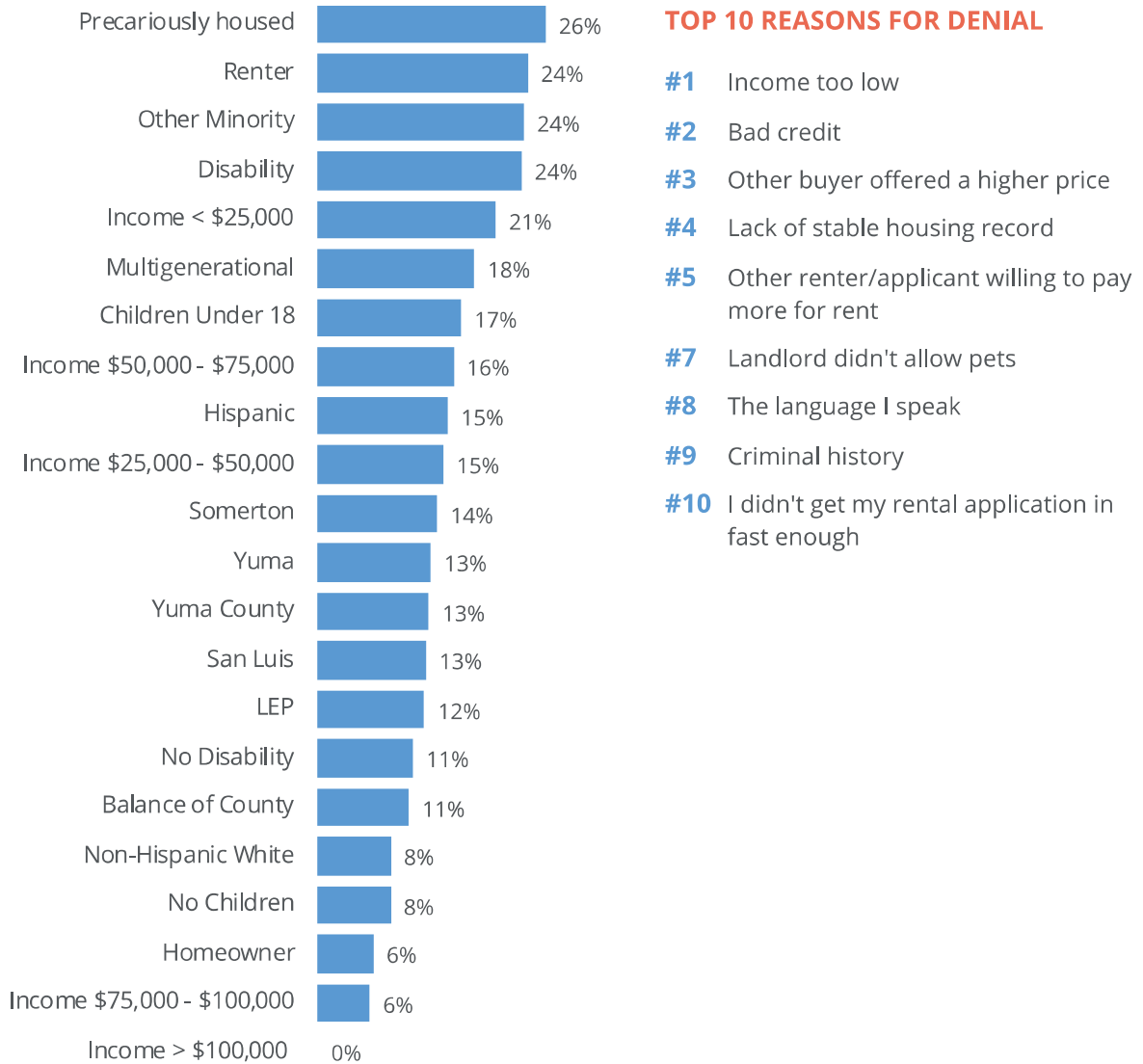
Note:  
 Respondent identified experiencing one or more types of housing instability in the past five years, including temporarily “couch surfing”, living in a hotel or motel, vehicle, camping, homeless shelter, domestic violence shelter, or other temporary or transitional housing situation.

Source:  
 Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.



**Denied housing to rent or buy.** Among survey respondents who seriously looked for housing to buy or rent in the last five years, 13 percent were denied housing to rent or buy. Residents who are currently precariously housed are twice as likely as other residents to have experienced housing denial (26% v. 13%), as are renters (24%), Other Minority respondents (24%), and households that include a member with a disability (24%). The most common reasons for being denied housing to rent or buy are income too low, bad credit, the other buyer or applicant was willing to pay a higher price, and a lack of a stable housing record. The top reasons for denial did not vary meaningfully based on respondent characteristics.

**Figure A-16.**  
**Denied Housing to Rent or Buy when Seriously Looking for Housing in**  
**Anywhere in Yuma County and Top 10 Reasons for Denial**



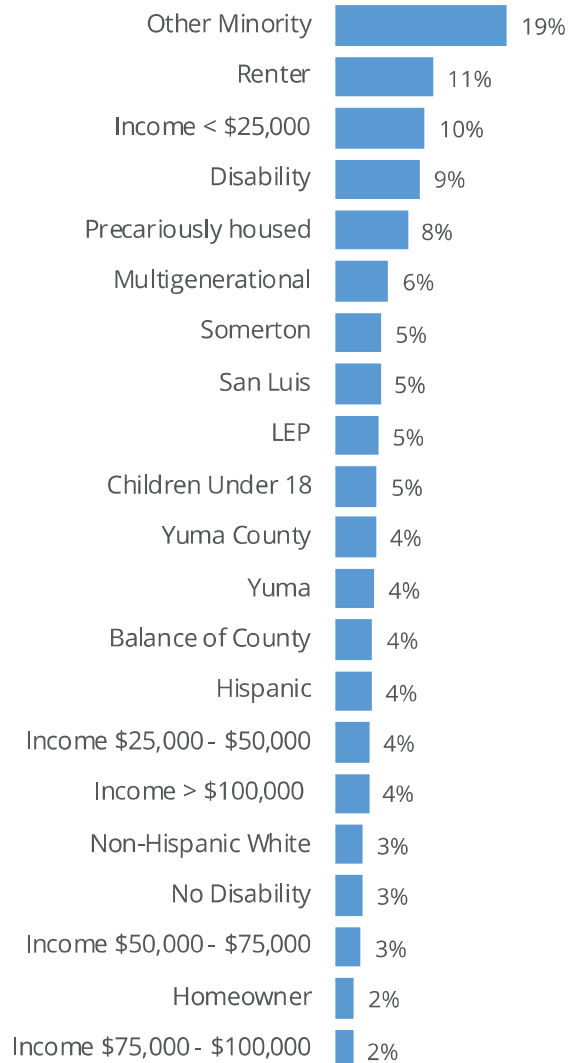
Note: Denial did not necessarily occur in the current community of residence. Sample size too small to report denial rate for residents with a housing subsidy.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Experience with housing discrimination.** Overall, one in 25 (4%) survey respondents believe they experienced discrimination when looking for housing in Yuma County. Residents who identify with a racial group other than White and are non-Hispanic were most likely to say they experienced housing discrimination (19% v. 3% non-Hispanic White and 4% Hispanic). Renters, low income households, and households that include a member with a disability, and those who are currently precariously housed all believe they

experienced housing discrimination at rates at least twice that of survey respondents overall.

**Figure A-17.**  
**When you looked for housing in the city of Yuma, San Luis, Somerton, the town of Wellton, or unincorporated Yuma County, did you ever feel you were discriminated against? (% Yes)**



Note:  
 Discrimination did not necessarily occur in the community of current residence.  
 Housing Subsidy sample too small to report.

Source:  
 Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

When asked to describe the reason why they felt discriminated against, the reasons included:

- Race or ethnicity (50%);
- Income (16%);
- Age (16%);
- Looks or appearance (16%);
- Familial status/having children/family size (9%);

- Sex or gender (9%);
- National origin/immigration status (9%);
- Disability (3%);
- Housing subsidy/Section 8 (3%); and
- Bad credit/history of eviction or foreclosure (3%).

Examples of how respondents described their experience include:

- *"I was once told my kind did not know how to pay rent or keep units clean." (Resident survey respondent)*
- *"Because I am Hispanic, and it wasn't until they learned that my husband works for the BP that we were paid attention to." (Resident survey respondent)*
- *"Because not a lot of the properties that were open for rent would accept my housing voucher/Section 8." (Resident survey respondent)*
- *"En algunos lugares no quieren niños." In some places they do not want children. (Resident survey respondent)*
- *"Por ser hispana y no suficiente ingreso." For being Hispanic and not enough income. (Resident survey respondent)*
- *"We were told to look on a rougher side of town instead of the side we wanted." (Resident survey respondent)*
- *"When I arrive the price change after I was told a price on the phone." (Resident survey respondent)*

In focus groups, some participants with disabilities described experiencing discrimination when trying to make reasonable accommodation requests for support animals. These participants were unsure of their rights and wanted to learn about their rights. Stakeholders suggested that the tight housing supply makes residents less willing to complain about discriminatory treatment out of fear of compromising their housing situation.

- *"We haven't seen any fair housing issues. We are in San Luis, but families don't report because they don't want to get into trouble." (South County stakeholder focus group participant)*

- *“Very seldom hear of anyone claiming they were discriminated against. It all goes back to the same problem, because there are not enough homes, so they will put up with a lot.” (South County stakeholder focus group participant)*
- *“Have heard of people having really bad landlords—they will ask for prayer in church because they’re being treated badly.” (South County stakeholder focus group participant)*

## Future Housing Preference

Survey respondents shared their future housing preferences, including the desire for homeownership or changing their housing situation as their family grows or they age.

**Desire to move.** Overall, 53 percent of survey respondents plan to stay in their current home for as long as possible, and this rate is similar in San Luis, Somerton, and Yuma, and higher (64%) in the Balance of County. Slightly less than one in 10 (8%) want to stay in their current home but worry they won’t be able to. About two in five respondents plan to move at some point in the next five years. Figures A-18 through A-20 present the share of respondents who plan to stay or move and the top five reasons why they plan to move in the future. The most common reasons for wanting to move are:

- Want a bigger home;
- I rent and I want to own;
- Family reasons;
- Want a larger lot/more property; and
- I want to move to a different neighborhood in my community.

Top reasons for wanting to move that differ from Yuma County respondents overall include:

- Homeowners and moderate income households wanting to turn their current home into an income property;
- High income households wanting to retire or downsize; and
- Respondents in multigenerational households wanting to move to find a job outside of Yuma County.

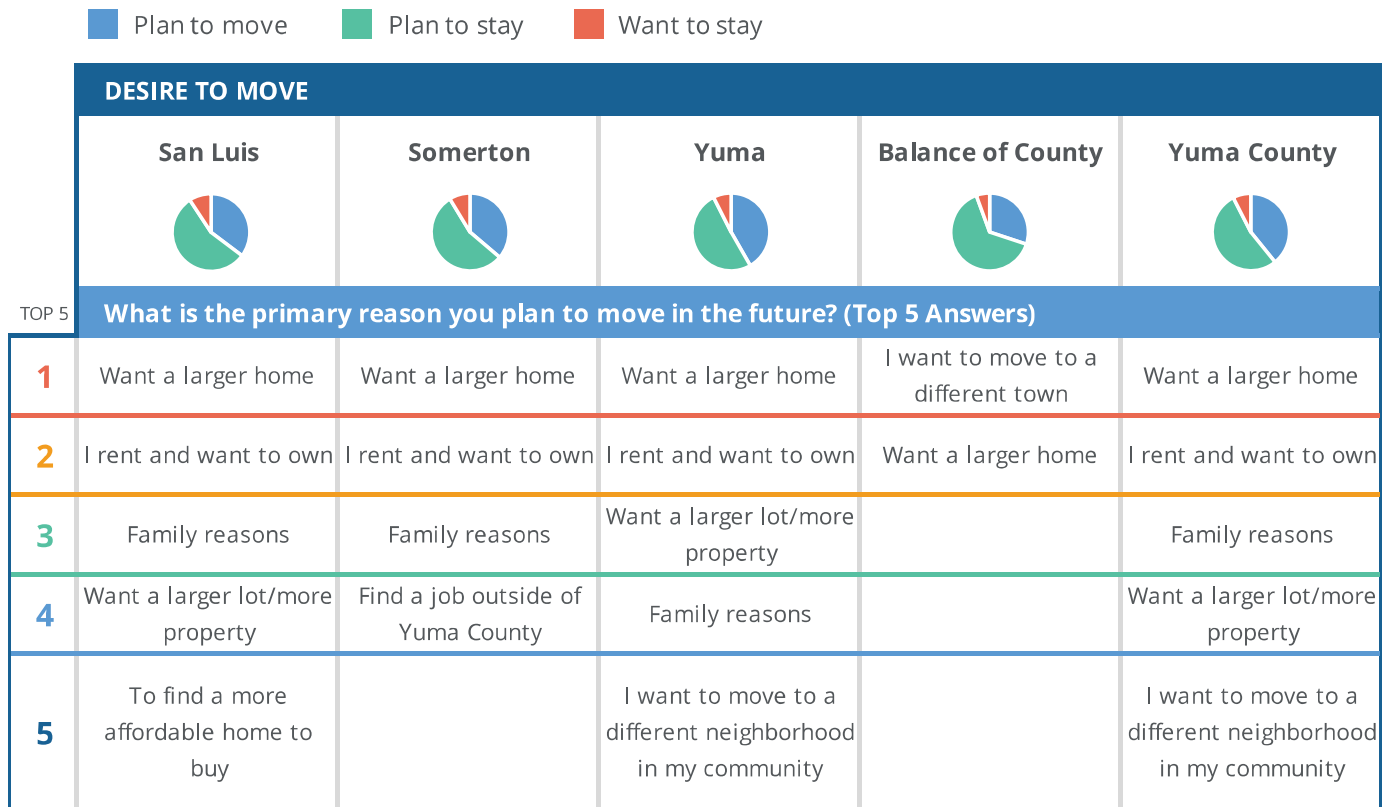
**Figure A-18.  
Desire to Move and  
Primary Reason to  
Move (Top 5  
Answers) by  
Jurisdiction**

Note:

The sample size of Somerton and Balance of county respondents planning to move in the future is small so only the top few reasons for wanting to move are shown.

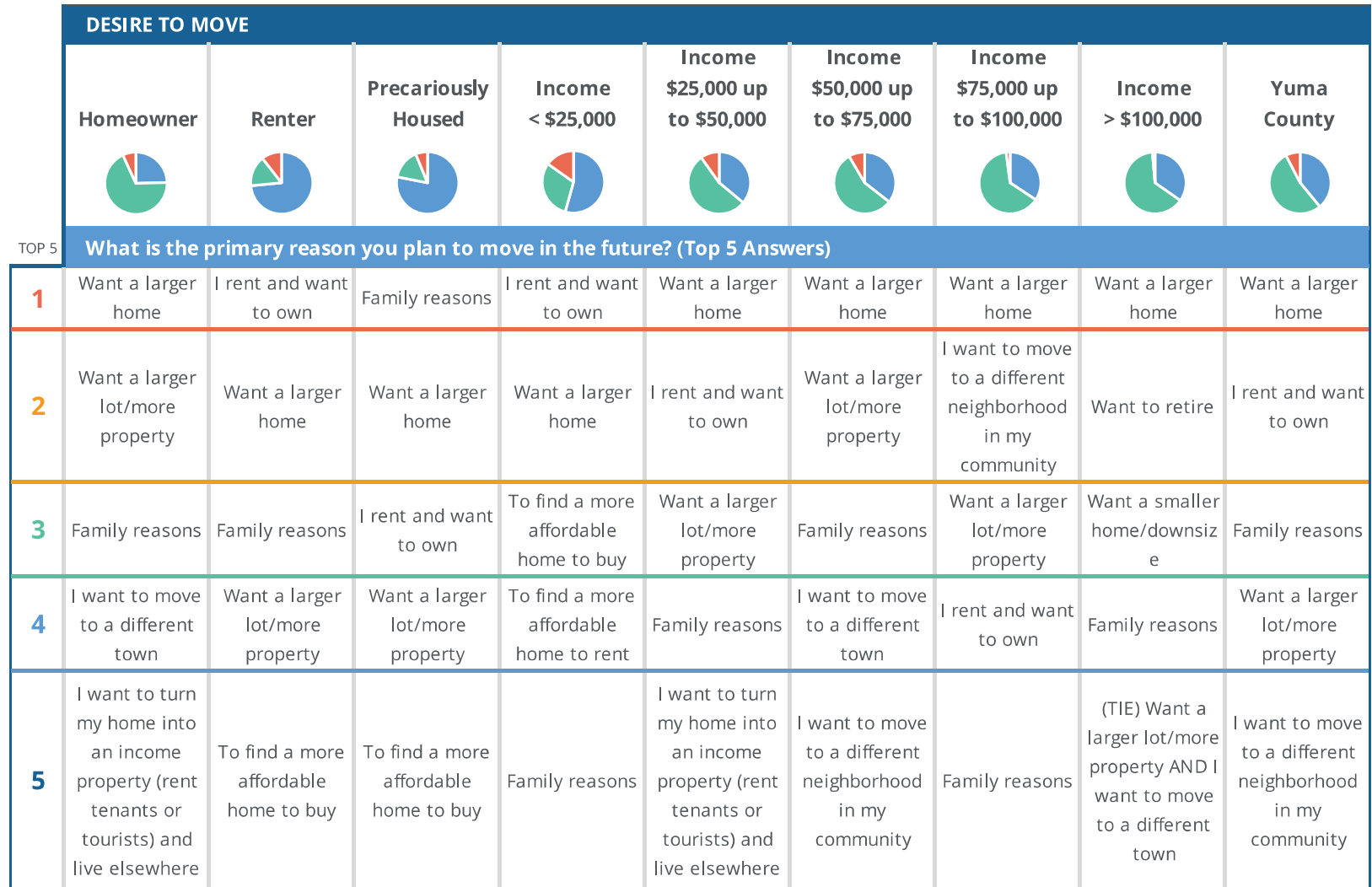
Source:

Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.



**Figure A-19. Desire to Move and Primary Reason to Move (Top 5 Answers) by Tenure and Income**

■ Plan to move   
 ■ Plan to stay   
 ■ Want to stay

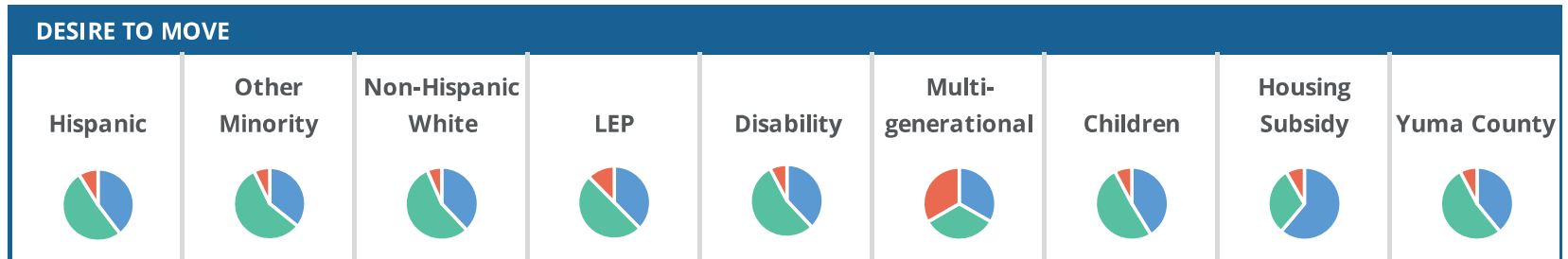


Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-20.**

**Desire to Move and Primary Reason to Move (Top 5 Answers) by Respondent Characteristics**

■ Plan to move   
 ■ Plan to stay   
 ■ Want to stay



TOP 5

**What is the primary reason you plan to move in the future? (Top 5 Answers)**

	Hispanic	Other Minority	Non-Hispanic White	LEP	Disability	Multi-generational	Children	Housing Subsidy	Yuma County
<b>1</b>	Want a larger home	Family reasons	Want a larger home	Want a larger home	Want a larger home	Want a larger home	Want a larger home	Want a larger home	Want a larger home
<b>2</b>	I rent and want to own	Want a larger home	Want a larger lot/more property	I rent and want to own	Family reasons	Family reasons	Want a larger lot/more property	I rent and want to own	I rent and want to own
<b>3</b>	Family reasons	I rent and want to own	I rent and want to own	Want a larger lot/more property	I rent and want to own	I rent and want to own	I rent and want to own	-	Family reasons
<b>4</b>	Want a larger lot/more property	Want a larger lot/more property	Family reasons	Family reasons	I want to move to a different town	Find a job outside of Yuma County	Family reasons	-	Want a larger lot/more property
<b>5</b>	I want to move to a different neighborhood in my community	I want to move to a different town	I want to move to a different town	(THE) TO find a more affordable home to rent AND To find a more	Want a larger lot/more property	To find a more affordable home to buy	I want to move to a different neighborhood in my community	-	I want to move to a different neighborhood in my community

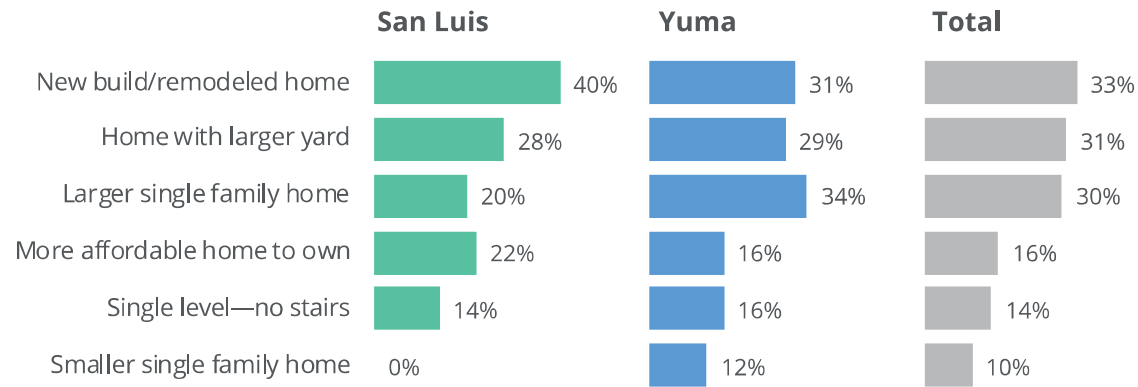
Note: The sample size of Housing Subsidy respondents planning to move in the future residents is small so only the top two reasons for wanting to move are shown.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.



**Type of and availability of preferred housing.** Newly constructed homes, homes with a larger yard, and larger homes are among the types of housing that who plan to move desire, as shown in Figure A-21. More than one in 10 are looking for single level homes with no stairs. By and large, about two-thirds of these respondents believe that the community they currently live in offers the type of housing they seek. Only 4 percent of respondents said that none of the communities in Yuma County offer the type of housing they want.

**Figure A-21.**  
**What type of housing do you plan to move to? By Jurisdiction**



Note: Types of homes desired by at least one in 10 (10%) Yuma County potential movers are shown. Sample sizes of those planning to move are too small to report for Somerton and Balance of County.

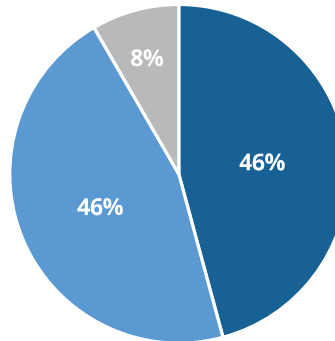
Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Desire to own.** Yuma County has a culture of homeownership. Across the board, most who rent want to own. Among renters, nearly half (46%) plan to buy a home in the next five years and 46 percent want to buy in the next five years but are not sure if they will be able to. As shown in Figure A-22, the greatest share of renters who want to buy have not yet done so because they have too much debt, do not have a down payment, or their credit score is too low. Lack of housing to buy that they can afford is also an issue for nearly one in five future homeowners.

**Figure A-22.**  
**Desire to Buy and the Top Two Reasons Why Renters Who Want to Buy Continue to Rent**

Which of the following is most true for you?

- Plan to buy
- Want to buy
- Do not want to buy



Top Two Reasons Why Renters Who Want to Buy Have Not Yet Bought		
I have too much debt (credit cards, car loans, school loans) to qualify for a mortgage	35%	<div style="width: 35%;"></div>
Can't come up with a down payment	32%	<div style="width: 32%;"></div>
Bad credit/low credit score	21%	<div style="width: 21%;"></div>
Housing is not affordable to buy where I want to live	17%	<div style="width: 17%;"></div>
There is no affordable housing I want to buy	12%	<div style="width: 12%;"></div>
Don't want to buy until I'm done with school/graduate	9%	<div style="width: 9%;"></div>
No credit history	9%	<div style="width: 9%;"></div>
The type of home I want to buy is not available in the area of Yuma County I want to live	9%	<div style="width: 9%;"></div>
I don't want to buy anywhere in Yuma County	7%	<div style="width: 7%;"></div>
I have been told by lenders that I won't qualify for a loan	6%	<div style="width: 6%;"></div>
Affordable housing isn't available at all—I would live anywhere in Yuma County	4%	<div style="width: 4%;"></div>
Cash and above-market offers by other buyers	4%	<div style="width: 4%;"></div>
I prefer to keep renting/do not want to buy	3%	<div style="width: 3%;"></div>
Multiple/seasonal jobs don't allow me to qualify for a mortgage	3%	<div style="width: 3%;"></div>
Tried to get a mortgage and couldn't qualify	2%	<div style="width: 2%;"></div>
Can't afford homeowner association/condo dues on top of a mortgage	1%	<div style="width: 1%;"></div>

Note: Data for all Yuma County renters are shown. Sample sizes are too small to report findings by resident characteristics.

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Lack of homes to buy, particularly affordable homes.** In focus groups, stakeholders shared similar sentiments to survey respondents, describing the tight housing market and the lack of supply of homes affordable to low and moderate income buyers. Affordable homes are purchased as quickly as they can be built.

- *“They couldn’t find one home to buy. At one point there were no houses on the market in Somerton.” (South County stakeholder focus group participant)*
- *“For single family homes, what we’ve been tracking for the last few years, is the number of legal resident aliens in the U.S. who live in Mexico because they can’t find a home in the U.S. that they can afford to buy. If they’re low income, they’ve become accustomed to living on credit, so they can never see homeownership as an option. They are left to USDA or HUD. Only Comite, and Housing America offer those programs. We can’t serve everyone who comes through the door. We don’t have the capacity.” (South County stakeholder focus group participant)*
- *“Next year, we’re finishing 169 unit subdivision, and now have 100 applications for people who couldn’t get in because there is not room. All lots already spoken for. It’s the availability for affordable housing.” (South County stakeholder focus group participant)*

In the focus group with San Luis residents, several participants describe how, as single women, being able to become homeowners seems impossible with only one income. Those working as teachers or other roles in education do not earn enough to qualify for a conventional loan but earn too much to get any assistance. They feel this is “demoralizing.” They have been working in the community for more than 10 years and work for the service of their community but cannot afford to buy in their communities despite having good credit scores. High rents also make it difficult to save. Participants in this focus group described that the floor plans available from local builders are not necessarily suited to their family’s needs, which requires spending more time looking for a suitable home, while at the same time, prices rise.

**Desire to stay.** As discussed previously, 8 percent of survey respondents want to stay in their current home but worry that they will have to move. Financial issues drive this concern, followed by worry that the rent or property taxes will increase too much. Others worry that challenges associated with aging in place will require them to move, such as not being able to keep up with maintenance or housekeeping and health issues.

## Access to Opportunity

Survey respondents and focus group participants shared their experience with and perceptions of access to economic opportunity in their neighborhood and community.

**Neighborhood challenges.** Figures A-23 through A-25 present the top nine neighborhood challenges experienced by the greatest proportion of survey respondents. Overall, 58 percent of Yuma County respondents experience one or more of the twelve neighborhood challenges included in the survey.

- Balance of County residents are more than twice as likely as respondents overall to report “there are inadequate sidewalks, streetlights, drainage, or other infrastructure in my neighborhood;”

- One in four residents of San Luis and Somerton say there are “not enough job opportunities in the area.” Housing subsidy recipients are nearly three times more likely than other respondents to point to a lack of jobs as a neighborhood challenge.
- Somerton residents are three times as likely as other respondents to note that there are “no or few grocery stores in the area.”
- Multigenerational households and those that include a member with a disability are twice as likely as other respondents to think their “neighborhood does not have safe places for children to play outside” (20% v. 11%).

**Figure A-23. Neighborhood Challenges by Jurisdiction**

Higher than Region (>5 percentage points)  
 Lower than Region (<5 percentage points)

Neighborhood Challenge	San Luis	Somerton	Yuma	Balance of County	Yuma County
None of the above	35%	35%	46%	31%	42%
There are inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	8%	18%	11%	31%	12%
Not enough job opportunities in the area	26%	25%	7%	5%	11%
My neighborhood does not have safe places for children to play outside	7%	7%	12%	13%	11%
No or few grocery stores/healthy food stores in the area	16%	31%	5%	11%	10%
Too much traffic/street/highway noise	5%	4%	8%	10%	7%
I am concerned about my or my family's safety in my current neighborhood	3%	3%	6%	5%	5%
Poor/low school quality in my neighborhood	5%	8%	4%	1%	4%
High crime in my neighborhood	1%	3%	5%	3%	4%
I need to be closer to health care/medical facilities	3%	5%	1%	1%	2%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-24. Neighborhood Challenges by Tenure and Income**

Higher than Region (>5 percentage points)  
 Lower than Region (<5 percentage points)

Neighborhood Challenge	Homeowner	Renter	Precariously Housed	Income < \$25,000	Income \$25,000 up to \$50,000	Income \$50,000 up to \$75,000	Income \$75,000 to \$100,000	Income > \$100,000	Yuma County
None of the above	47%	37%	42%	40%	47%	42%	46%	58%	42%
There are inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	13%	13%	10%	15%	12%	21%	24%	12%	12%
Not enough job opportunities in the area	10%	16%	17%	18%	15%	11%	6%	7%	11%
My neighborhood does not have safe places for children to play outside	10%	13%	10%	15%	13%	11%	18%	8%	11%
No or few grocery stores/healthy food stores in the area	11%	9%	14%	9%	14%	16%	12%	10%	10%
Too much traffic/street/highway noise	6%	13%	7%	12%	8%	11%	10%	5%	7%
I am concerned about my or my family's safety in my current neighborhood	3%	10%	8%	9%	5%	6%	6%	2%	5%
Poor/low school quality in my neighborhood	4%	5%	3%	5%	5%	9%	4%	1%	4%
High crime in my neighborhood	3%	8%	3%	9%	5%	4%	5%	2%	4%
I need to be closer to health care/medical facilities	2%	2%	2%	2%	2%	2%	3%	1%	2%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-25. Neighborhood Challenges by Respondent Characteristics**

Higher than Region (>5 percentage points)  
 Lower than Region (<5 percentage points)

Housing Challenge	Hispanic	Other Minority	Non-Hispanic White	LEP	Disability	Multi-generational	Children	Housing Subsidy	Yuma County
None of the above	45%	40%	51%	42%	32%	39%	45%	32%	42%
There are inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	14%	26%	16%	7%	20%	21%	15%	11%	12%
Not enough job opportunities in the area	16%	14%	6%	16%	15%	15%	13%	32%	11%
My neighborhood does not have safe places for children to play outside	14%	14%	9%	11%	20%	20%	16%	7%	11%
No or few grocery stores/healthy food stores in the area	14%	12%	11%	12%	9%	11%	11%	7%	10%
Too much traffic/street/highway noise	7%	14%	12%	2%	16%	8%	9%	5%	7%
I am concerned about my or my family's safety in my current neighborhood	5%	2%	6%	5%	9%	6%	6%	9%	5%
Poor/low school quality in my neighborhood	6%	5%	3%	1%	5%	5%	6%	14%	4%
High crime in my neighborhood	4%	5%	5%	1%	8%	4%	5%	9%	4%
I need to be closer to health care/medical facilities	3%	0%	1%	2%	2%	2%	2%	2%	2%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

In focus groups, participants described housing that is affordable to low income households as concentrated in less desirable areas in South County or in the Mesa Heights neighborhood in the city of Yuma. Some voucher programs require utilities to be included in the rent, which, in the experience of voucher holders, is rarely offered in newer, higher quality rental properties, limiting prospective tenants in Yuma to Mesa Heights or older properties. Despite their discussion of the higher rate of crime, most of the focus group participants like living in their neighborhood and believe that with more or better policing and infrastructure investments from the city that the neighborhood will improve.

- *“The concentration of low income groups in south Yuma county is another fair housing issue. There is a large concentration of LEP, low income, Hispanics who are also seasonal workers. The opportunities for homeownership are also very, very low.” (South County stakeholder focus group participant)*
- *“Needles in park, I won’t take my kids to a park in Yuma.” (Disability focus group participant)*
- *“You are safe only if you are close to the police station.” (Disability focus group participant)*
- *“Found meth and the police would not come pick it up, Achieve came and picked it up.” (Disability focus group participant)*

**Neighborhood challenges—residents with disabilities.** When asked what is needed to help their household member with a disability to access community amenities, facilities and services, survey respondents made numerous suggestions. Among the most common were accessibility improvements such as sidewalks, parks, and playgrounds, activities inclusive of children and adults with disabilities, and improved public transportation.

- *“Sidewalks would go a long way.” (Resident survey respondent)*
- *“It would be nice if there was a park on this side of town. People used to use school playgrounds as parks on the westside, but now all school grounds locked. My disabled person would like to walk places, but not safe in this neighborhood.” (Resident survey respondent)*
- *“Más actividades físicas y sociales.” More physical and social activities. (Resident survey respondent)*
- *“Transportation with assistance to get in and out.” (Resident survey respondent)*
- *“Necesita que la ciudad ponga mas atencion en cuanto como los recidentes de la comunidad no respetan las banquetas para que ella podieron caminar sin miedo a trampezar/chocar con vehiculos que obstruin el camino.” She needs the City to pay more attention to how community residents do not respect the sidewalks, so that she could walk*



*without fear of trapping/colliding with vehicles that obstruct the road. (Resident survey respondent)*

- *“Se necesita que haya un centro de actividades para hacer diferentes tipos de ejercicios para estas personas.” There needs to be an activity center to do different types of exercises for these people. (Resident survey respondent)*

**Access to employment.** When discussing employment, focus group participants discussed the need for continued employment growth in Yuma County, especially employment opportunities in the summer season. Participants living and working in South County emphasized the economic difference between agricultural workers who live in South County year round versus those working in other industries.

- *“In the summer, the off season, we get unemployment rates of 48 to 78 percent in Somerton. That is how bad it is. Seven out of 10 farmworkers will be unemployed in the summer. The state and the country screams when they have a 10 percent unemployment rate, but they can’t imagine what we have. They count and compare to city of Yuma economic opportunities. Somerton is really different.” (South County stakeholder focus group participant)*
- *“We have a list of orgs and companies that offer felony friendly employment, but the main barrier (to employment) is transportation. YCAT used to give us passes and this now happens only rarely.” (Homelessness focus group participant)*

**Access to employment—residents with disabilities.** Survey respondents whose household includes a working-age member with a disability offered suggestions to support meeting their household member’s employment goal. The most common suggestions include improving access to effective Vocational Rehabilitation, Employment Services, and other employment supports, expanding the number of businesses willing to hire residents with disabilities, transportation system improvements, and mental and behavioral health care services.

- *“Easy access to Employment Services, current services require so many steps and requirements. Eventually frustration becomes a problem.” (Resident survey respondent)*
- *“Que haya mas ofertas de trabajo para los discapacitados, que no sean ignorados ni olvidados.” That there are more job opportunities for the disabled; that they are not ignored or forgotten. (Resident survey respondent)*
- *“Employers who understand and can learn to work with a mentally ill person. Overall, my son is quite capable of work, but will by nature of his illness, will have a couple of bad days a month.” (Resident survey respondent)*
- *“Agencies that teach and support people with disabilities for the long run.” (Resident survey respondent)*

- *“Que haya un centro de entrenamiento para esa persona y la preparen para el trabajo.”  
Have a training center for that person and prepare them for the job. (Resident survey respondent)*
- *“Proper transportation.” (Resident survey respondent)*
- *“More companies that are educated in working with an individual with disabilities.”  
(Resident survey respondent)*

**Access to transportation.** As discussed above, access to public transportation is needed, particularly for residents who are homeless, those with disabilities who cannot drive, and for residents who cannot afford a personal vehicle. Most adults in Yuma County drive or carpool with others to get to the places they need to go. Stakeholders and resident focus group participants describe the YCAT bus system as being generally good, considering the size of Yuma County’s population, but stops are few and far between, and not all employment centers are served by YCAT.

- *“YCAT bus system is generally good but the nearest stop is two blocks from the Mission, which is difficult for those with accessibility needs,” (Homelessness focus group participant)*
- *“Need to have easier accessibility to get [household member with a disability] transportation to and from their job.” (Resident survey respondent)*

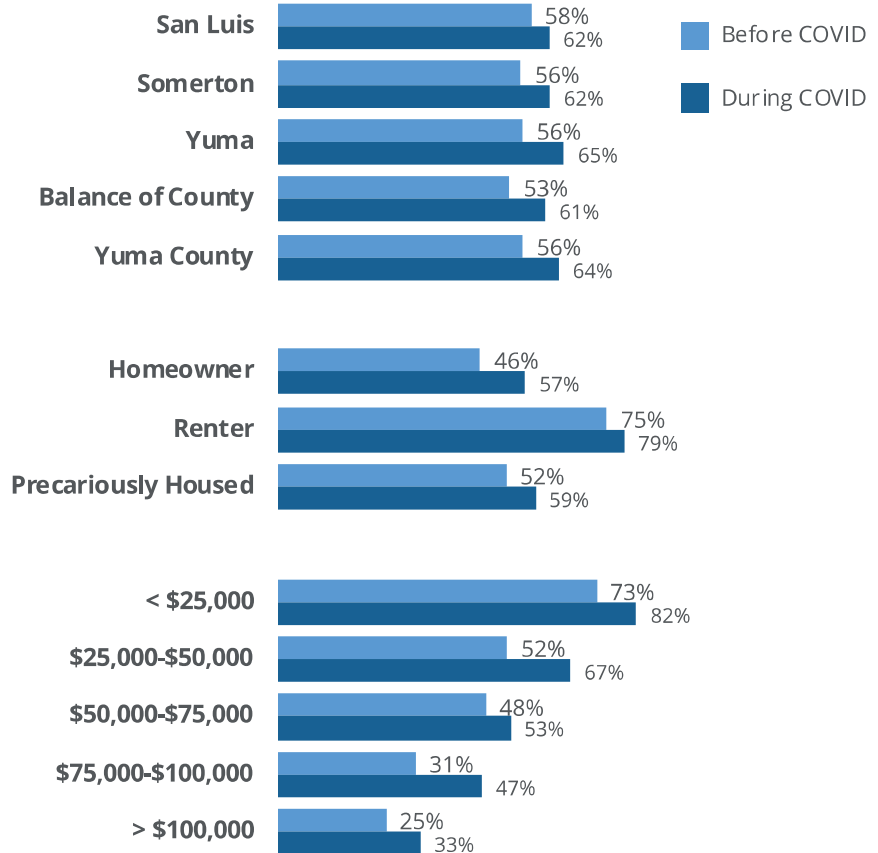
When identifying neighborhood challenges, survey participants had the opportunity to identify the extent to which public transportation difficulties were an issue for the respondent; overall, less than 7 percent of respondents indicated that they wanted to use public transportation but were unable to do so due to limited service or distance to the closest bus route. This did not vary meaningfully by any respondent characteristics.

## **COVID Housing Impacts**

As noted previously, the community engagement process occurred in Fall 2020, when the COVID pandemic still impacted daily life in Yuma County.

**Housing situation impacts.** Figure A-26 presents the share of survey respondents who had to take steps to cut spending, increase income, or request assistance in order to pay housing costs before (in 2019) and after (2020) the start of the COVID pandemic. As shown, more than half of Yuma County residents (56%) took action beyond their regular employment to pay housing costs. Renters were much more likely to need help than homeowners, and the share of households needing help decreases as income rises.

**Figure A-26.**  
**% of Respondents**  
**Needing To**  
**Reduce Spending,**  
**Increase Income,**  
**Borrow, or Seek**  
**Public Assistance**  
**to Pay Housing**  
**Costs, Before and**  
**During the COVID**  
**Pandemic**



Note:

Includes all respondents who indicated making one or more changes to their expenses, income, or borrowing to pay housing costs, including utilities, prior to January 2020 (Before COVID) or after January 2020 (During COVID).

Source:

Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

Figures A-27 through A-29 present selected strategies the greatest proportion of Yuma County households pursued in order to pay housing costs after the onset of the COVID pandemic.

- Renters and low income households were more likely than other households to skip payments on bills, take on debt, pay less than the minimum amount due on bills, and accept utility assistance than other households.
- Respondents with LEP, households that include a member with a disability, and Hispanic respondents were more likely than others to have had their housing situation impacted by the COVID pandemic.
- Overall, 14 percent of multigenerational households had friends or family move in with them as a result of the COVID pandemic.
- About one in seven (16%) housing subsidy respondents accepted assistance to pay their rent or mortgage.

Examples of how respondents described their experience include:

- *“My husband work while he had the virus because if he was absent at work he will not get paid.” (Resident survey respondent)*
- *“My daughter’s family moved in due to their job loss/financial situation.” (Resident survey respondent)*
- *“Bills don’t get paid all way just half, go without gas.” (Resident survey respondent)*
- *“Habla a mi compania para retrasar pago de la casa x 3 meses.” Talk to my company to delay the house payment for three months. (Resident survey respondent)*
- *“I give plasma for additional money.” (Resident survey respondent)*
- *“Lost my job and home.” (Resident survey respondent)*
- *“Mi hijo tuvieron que mudarse a mi casa para el cuidado de su nino.” My son had to move to my house to take care of their child. (Resident survey respondent)*
- *“My husband lost his job due to COVID.” (Resident survey respondent)*
- *“I’m afraid I won’t make next rent payment and will be kicked out.” (Resident survey respondent)*

**Figure A-27.**

**How has the COVID-19 crisis impacted your housing situation? By Jurisdiction**

- Higher than Region (>5 percentage points)
- Lower than Region (<5 percentage points)

COVID Housing Impact	San Luis	Somerton	Yuma	Balance of County	Yuma County
None; my housing situation has not been affected by the COVID-19 crisis	41%	47%	49%	61%	49%
To pay for our housing costs, we have skipped payment(s) on some bills	12%	9%	9%	4%	9%
We have taken on debt to pay housing costs (e.g., credit cards, payday loans, loans from family/friends)	10%	6%	8%	3%	8%
To pay for our housing costs, we have paid less than the minimum amount due on some bills	7%	7%	8%	4%	7%
We paid our full rent or mortgage late	8%	8%	6%	2%	6%
We accepted assistance to pay my utilities	11%	9%	4%	3%	5%

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-28.**

**How has the COVID-19 crisis impacted your housing situation? By Tenure and Income**

■ Higher than Region (>5 percentage points)  
■ Lower than Region (<5 percentage points)

Housing Challenge	Homeowner	Renter	Precariously Housed	Income < \$25,000	Income \$25,000 up to \$50,000	Income \$50,000 up to \$75,000	Income \$75,000 to \$100,000	Income > \$100,000	Yuma County
<b>None; my housing situation has not been affected by the COVID-19 crisis</b>	58%	35%	47%	37%	54%	70%	76%	83%	<b>49%</b>
<b>To pay for our housing costs, we have skipped payment(s) on some bills</b>	7%	18%	7%	21%	12%	9%	4%	4%	<b>9%</b>
<b>We have taken on debt to pay housing costs (e.g., credit cards, payday loans, loans from family/friends)</b>	7%	14%	7%	17%	13%	11%	5%	3%	<b>8%</b>
<b>To pay for our housing costs, we have paid less than the minimum amount due on some bills</b>	5%	14%	7%	15%	12%	6%	3%	1%	<b>7%</b>
<b>We paid our full rent or mortgage late</b>	6%	10%	3%	9%	10%	7%	2%	3%	<b>6%</b>
<b>We accepted assistance to pay my utilities</b>	4%	11%	9%	15%	7%	3%	0%	1%	<b>5%</b>

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-29.**

**How has the COVID-19 crisis impacted your housing situation? By Respondent Characteristics**

■ Higher than Region (>5 percentage points)  
■ Lower than Region (<5 percentage points)

Housing Challenge	Hispanic	Other Minority	Non-Hispanic White	LEP	Disability	Multi-generational	Children	Housing Subsidy	Yuma County
None; my housing situation has not been affected by the COVID-19 crisis	53%	76%	75%	41%	51%	52%	58%	39%	<b>49%</b>
To pay for our housing costs, we have skipped payment(s) on some bills	13%	17%	5%	11%	15%	12%	15%	20%	<b>9%</b>
We have taken on debt to pay housing costs (e.g., credit cards, payday loans, loans from family/friends)	12%	7%	8%	12%	15%	14%	13%	7%	<b>8%</b>
To pay for our housing costs, we have paid less than the minimum amount due on some bills	10%	10%	5%	6%	11%	8%	10%	7%	<b>7%</b>
We paid our full rent or mortgage late	9%	7%	3%	9%	10%	6%	9%	5%	<b>6%</b>
We accepted assistance to pay my utilities	9%	5%	1%	11%	9%	9%	8%	18%	<b>5%</b>

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Behind on housing payments.** Overall, three in 10 renters report they are behind on the rent due to economic disruptions from the pandemic. The share of renters who are in arrears is highest among renters living in Somerton (48%) followed by San Luis renters (37%). Figure A-30 presents the share of renters behind on the rent and the median months behind and amounts owed.

**Figure A-30.  
Renters in Arrears Due to COVID Pandemic**

Renters	San Luis	Somerton	Yuma	Balance of County	Yuma County
<b>% Behind on the Rent</b>	37%	48%	28%	14%	30%
<b>Median Months Late</b>	2	1	2	1	2
<b>Median Amount Owed</b>	\$1,600	\$1,200	\$1,400	\$780	\$1,434

Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Landlord accommodations.** Most renters did not report receiving any form of landlord accommodation. The most common accommodation, waiver of late fees, was provided to 10 percent of renters, and is consistent across jurisdictions. About 8 percent of renters were provided with information about where they could get assistance to pay the rent, and a similar share were offered rent deferment. About one in 10 San Luis renters were given lease extensions or renewals without an accompanying rent increase (same rate). Few renters report receiving rent forgiveness, lease renewals at discounted rates, or being let out of their lease without penalty.

**Employment and social impacts.** Based on the resident and stakeholder focus groups, it is clear that the pandemic has taken a serious toll on the community, but especially among the Spanish-speaking community and those employed in agriculture.

San Luis residents who participated in the Spanish language focus group shared their experiences, many of which were echoed by stakeholder focus group participants.

**COVID impacts on agricultural workers**

- Participants described a shortage of farmworkers as a result of COVID, as many got sick and restrictions for workers coming from Mexico makes things worse. The lack of precautionary measures by agricultural employers made the spread very pervasive. Farm workers get sick and then return after work to crowded living conditions that worsen the spread. Even with the shortage of workers, wages in the area are very low compared to surrounding communities.



- One of the focus group participants mentioned that her husband is an agricultural worker. In her experience, there was no proper education for workers about how to avoid/lower the spread of COVID. Of the group of 42 farmworkers to which her husband belongs, 38 got COVID. Her husband contracted COVID, and since November, he still has pneumonia and has not been able to return to work.
- Businesses are now requiring COVID tests before employing people. Many businesses pay for the tests, but most agricultural places are passing the cost onto the workers. People are scrambling to find places that provide free tests. Tests can cost up to \$60 to \$70; this is too high for farm workers who on average earn \$80 per day. In addition, many of these workers take their family to help in the field so they need tests for all their family members. Things will get worse in the summer, during the low season with few jobs and high energy bills.

### **Economic impacts of COVID**

- Many people have seen a reduction in hours or lost their job. Some people have returned to Mexico.
- Many others are doubled up, living with relatives and friends, in places that are too small.
- COVID has brought along many unexpected expenses. Residents feel even if you are lucky enough to keep your job/hours, childcare can be a devastating expense, especially for single women—they get behind in their bills. Childcare costs have gone up, due to the new precautionary measures childcare centers have to take to operate. Families are caught in a cycle—they can't afford both rent and childcare but can't afford to quit working.
- Having kids doing online learning makes grocery expenses a lot higher; kids eat a lot and they are no longer getting meals at school.
- Having COVID presents a big financial challenge, if a worker tests positive they have to stay home and quarantine, but they do not get paid. Unemployment insurance is hard to get and takes time. By the time they get the help they are already behind on rent and bills. Residents feel landlords and banks are not flexible—these institutions do not understand the area.
- The border restrictions have impacted the economy in San Luis, a lot of people used to cross the border often to work and shop.

**Advice to support community recovery.** Survey respondents and focus group participants offered a range of recommendations to support community recovery from the pandemic.

## **Eviction and foreclosure prevention**

- *“Allow more time for tenants/homeowners to make their house/rent payment.” (Resident survey respondent)*
- *“Help us find local lenders that are willing to work with those of us who have been late 2 in the last year.” (Resident survey respondent)*
- *“A housing benefit to prevent evictions.” (Resident survey respondent)*
- *“Assistance with rental and mortgage payments to prevent evictions and foreclosures. Applicant must provide proof of reason for loss of employment due to COVID 19.” (Resident survey respondent)*

## **Utility assistance**

- *“Ayudar en bajar pagos de los biles por ejemplo luz, agua reta y gas.” Help lower bill payments, for example electricity, water, and gas. (Resident survey respondent)*
- *“Don't allow APS to keep raising the rates for electricity. Having to choose food or paying your \$400 APS bill is something a parent should not have to choose between.” (Resident survey respondent)*
- *“Ayuda con los pagos de agua un descuento.” Help with water payments, a discount. (Resident survey respondent)*
- *“I fortunately have not become late on my rent what is an issue is APS—my electric bill is horrendous—that is what I'm falling behind on. This summer killed me; I lost my job because of Covid; I am almost \$3,000 behind on just the electric bill.” (Resident survey respondent)*

## **Business supports**

- *“Abrir los negocios y escuelas , paulatinamente y con las medidas sanitarias y de seguridad necesarias.” Open businesses and schools, gradually, with the necessary health and safety measures. (Resident survey respondent)*
- *“Allow everything to open back up and let down COVID restrictions. We cannot hide from this virus and life needs to go on.” (Resident survey respondent)*
- *“Continue to promote prevention and cooperation with stores, restaurants and other public places to continue business in a safe environment that they may continue to operate and generate income for families in need of those jobs.” (Resident survey respondent)*
- *“Do utmost to promote and keep local businesses afloat.” (Resident survey respondent)*
- *“I own a small business, but I did not qualify for a small business grant because my studio is at my home. We have our license, and everything is correct. I was surprised we didn't*

*qualify. My mom and brother-in-law also applied and were denied because they don't own a building. I may lose my business I have had for 12 years. I have lost almost all my clients. I hope we can survive. I think the rules for a small business grant are too strict. I help the community, and we give back to many children in need.” (Resident survey respondent)*

### **Education and childcare supports**

- *“Apply for Federal funds to set up childcare programs and other tutoring services to help young people recover lost education.” (Resident survey respondent)*
- *“Open up the businesses fully and get children back in school, distance learning is a disaster effecting now and for the near future.” (Resident survey respondent)*
- *“Help the families with children enrolled in school for they have had to stress on childcare during pandemic and even leaving jobs to care for children.” (Resident survey respondent)*
- *“Need assistance on childcare finances or school after school care.” (Resident survey respondent)*
- *“There should be more programs to assist those with children that cannot pay for childcare. Some preschools closed for the year of 2020 and parents have to stay home from work to care for their child.” (Resident survey respondent)*

### **Employment supports**

- *“Find ways to get businesses up and running again so they can create more jobs for people. A lot of that will have to do with lifting restrictions and eliminating people's fears of COVID-19 by sharing real data. People need to know that for most of the population, they may get sick from COVID but they will recover just fine. This is not something that people need to be that afraid of. Once they understand that, they will be more likely to get out and start using businesses like they used to do. This in turn will create more jobs.” (Resident survey respondent)*
- *Ayuda de trabajo.” Job help. (Resident survey respondent)*
- *“Create jobs in Yuma by courting companies that pay good wages.” (Resident survey respondent)*
- *“Expand transit system so more employees can take advantage of it. Enhance the transit system with bus shelters and shade to taking transit isn't so hard on persons health.” (Resident survey respondent)*
- *“Help people find jobs; don't just give away free money.” (Resident survey respondent)*

### **COVID prevention and treatment**

- *“Be more strict on mask policies and types of masks worn. Offer free testing in more areas to reduce crowding. Better mitigation plan requirements for businesses.” (Resident survey respondent)*
- *Cubrebocas obligatorias, pruebas constantes y que sean mas rapidas.” Require masks, frequent tests that are faster. (Resident survey respondent)*
- *“Rapid Testing to allow to return to work safely and quickly if you have been exposed to COVID and don't show symptoms.” (Resident survey respondent)*
- *“Be stricter with restrictions. So many people aren't following them, and aren't able to follow them (limited PPE, need to work, etc). We need clear messages from leadership on what's safe and the support for people to do that. We can't recover until we get our community spread under control.” (Resident survey respondent)*
- *“Close business so the virus stop spreading. Stop being selfish..... fine people that have parties.” (Resident survey respondent)*
- *“Have protections and assistance for those who are more susceptible to serious complications but allow others to get back to work and life.” (Resident survey respondent)*

### **Other recommendations**

- *“Más información. Más educación para el tema. Quizás más ayuda para las personas que han estado expuestos al covid. Ayuda sicológica? More information. More education on the subject. Perhaps more help for people who have been exposed to COVID? Psychological help?” (Resident survey respondent)*
- *“I believe that the city of Yuma has provided citizens with strong support and meeting the families' needs. I feel that we should continue in this direction until we surpass the pandemic.” (Resident survey respondent)*
- *“Focus funds on middle-class (mid income) families that don't qualify for the low income programs.” (Resident survey respondent)*
- *“Mas ayuda para personas que vivimos solos.” More help for people who live alone. (Resident survey respondent)*
- *“Please assist the elderly first, especially those who are retired, some can't afford their basic necessities with the amount they receive from Social Security. They're our most vulnerable group of people.” (Resident survey respondent)*

## **Yuma County Housing Types**

Participants in the resident survey rated the importance of offering different housing types in Yuma County's housing market and the appropriateness of different levels of density in city of Yuma neighborhoods.

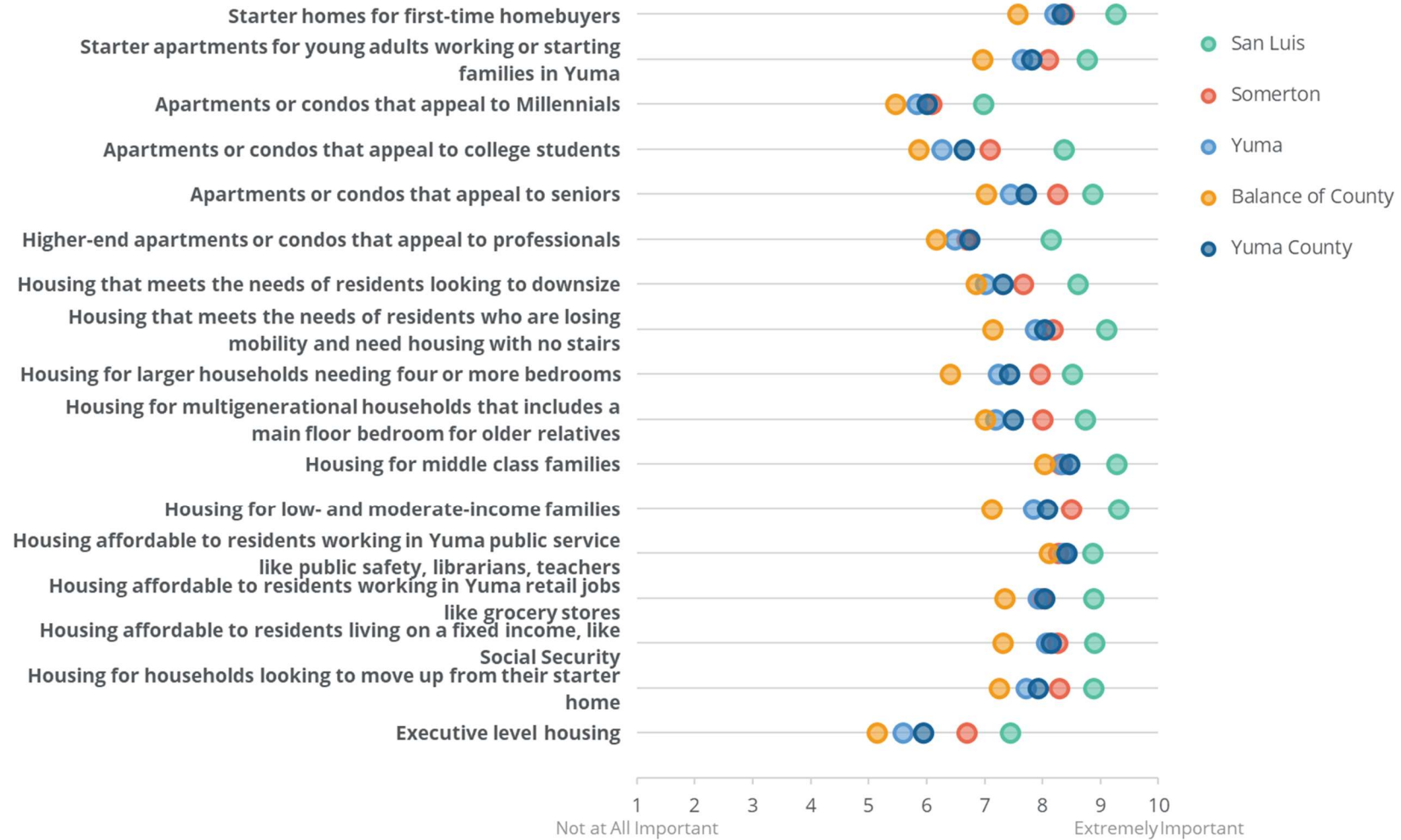
**Importance of certain home types.** Figures A-31 through A-35 present the average importance to residents that different housing types are included in the Yuma County housing supply. Survey respondents rated the importance of 17 different housing types, ranging from starter homes for first-time homebuyers, apartments that appeal to students, professionals, or seniors, to executive housing. As shown in the figures, survey respondents consider most of the different housing types to be important to include in the greater Yuma County housing market, but the degree of importance varies by place of residences, housing tenure, income, and respondent characteristics. In general, respondents considered executive housing, housing for students, and housing that appeals to Millennials to be less important than other housing types.

- On average, San Luis residents scored each of the housing types higher in importance than residents of other Yuma County communities, particularly those living in the Balance of County (Figure A-31).
- Starter homes to buy, starter apartments to rent, and housing for middle income families are among the most important housing types rated by renters and those who are currently precariously housed (Figure A-32).
- On average, lower income households gave higher importance ratings to most housing types, but the difference in importance scores compared to higher income households is fairly modest. The biggest gap in importance between lower and higher income households is on the importance of housing for low and moderate income families; not surprisingly lower and moderate income households consider this housing type much more important than higher income households (Figure A-33).
- In general, LEP respondents and Hispanic respondents gave higher importance ratings to most housing types than did non-Hispanic White respondents. The two exceptions are the nearly identical high importance assigned to housing for residents working in Yuma public service, such as public safety workers, librarians, and teachers and the relatively lower importance of housing types that appeal to Millennials (Figure A-34).
- On average, respondents from multigenerational households, those with children under 18 in the home, and respondents with a housing subsidy assigned similar importance ratings to Yuma County respondents overall.

In focus groups, participants shared their perception that in addition to more affordable housing, larger homes (more bedrooms), starter homes, and housing options for seniors were important and in short supply in Yuma County. Several stakeholder discussed the importance of adding “missing middle” housing types—duplexes, townhomes—in order to create more homeownership opportunities and help reduce the scarcity of rental housing.

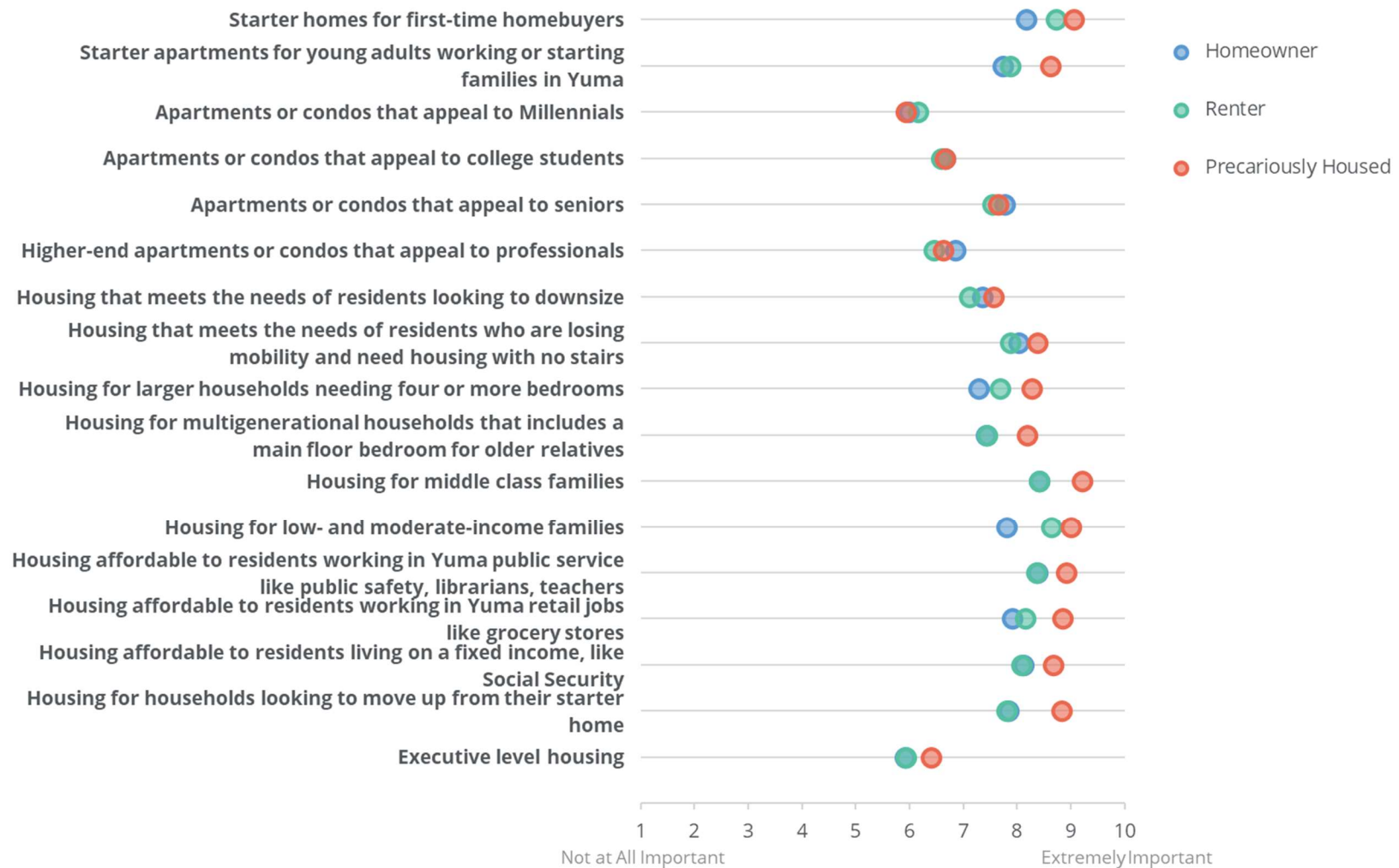
**Figure A-31.**

**How important to you is it that Yuma’s housing supply includes the following types of homes? By Jurisdiction**



Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-32. How important to you is it that the city of Yuma’s housing supply includes the following types of homes? By Tenure**



Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.



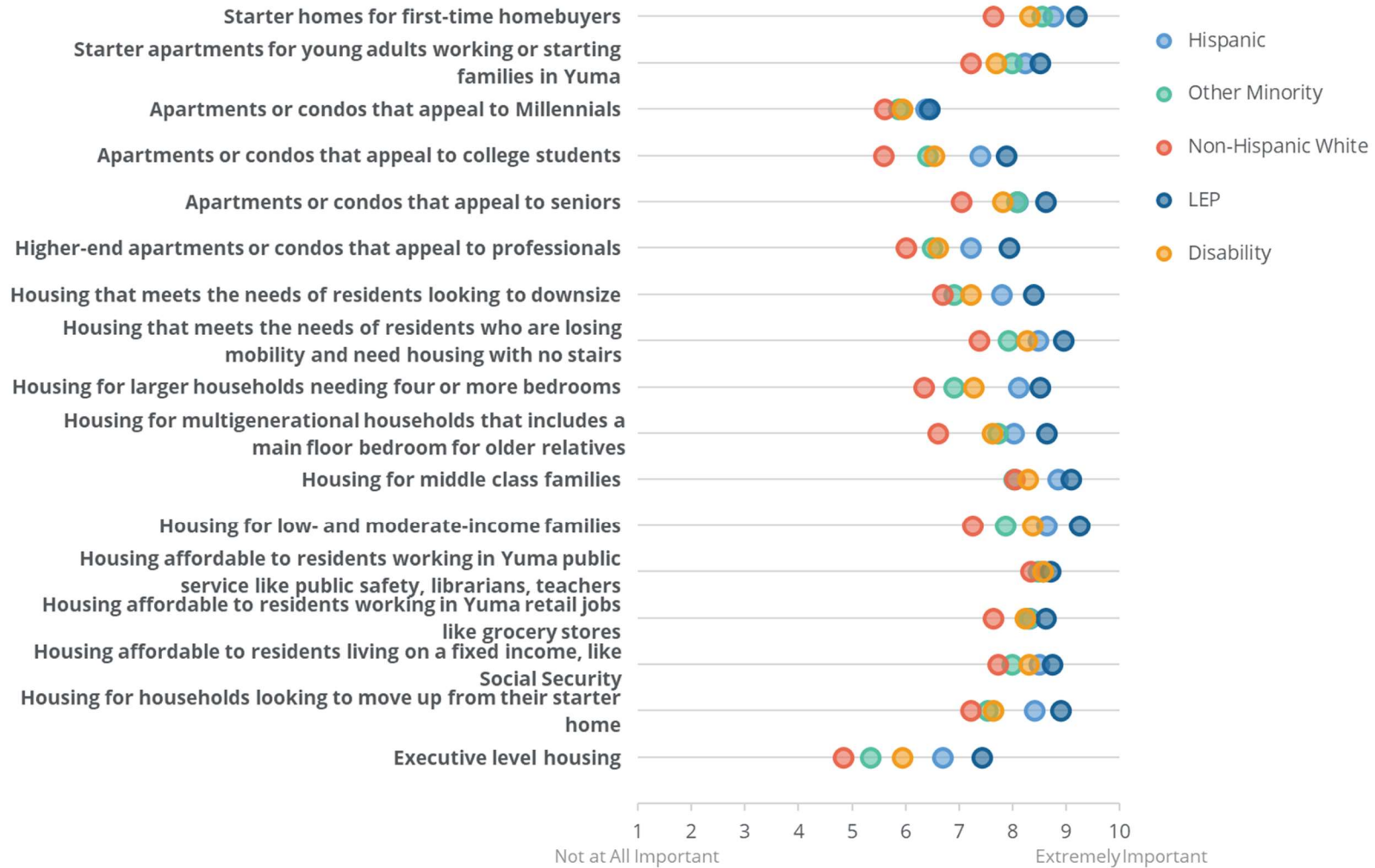
**Figure A-33. How important to you is it that the city of Yuma’s housing supply includes the following types of homes? By Income Level**



Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.



**Figure A-34. How important to you is it that the city of Yuma’s housing supply includes the following types of homes? By Respondent Characteristics**



Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Figure A-35. How important to you is it that the city of Yuma’s housing supply includes the following types of homes? By Respondent Characteristics**



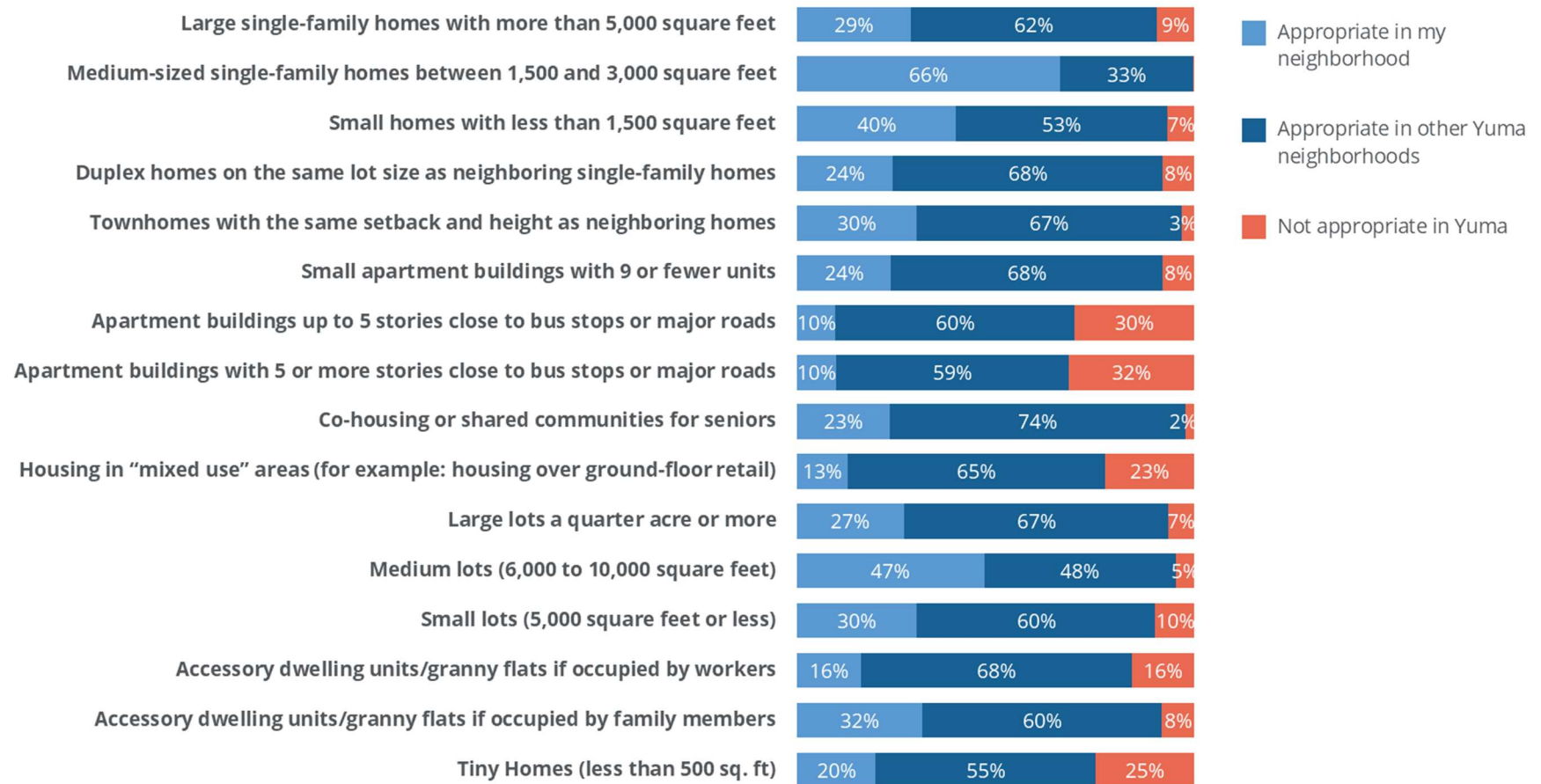
Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Appropriate location for certain home types.** To understand the potential for acceptance of diverse housing types within the city of Yuma, survey respondents considered 15 different types of low to high density housing forms and selected whether the form was appropriate “in my neighborhood,” “in another Yuma neighborhood,” or was “not appropriate in the city of Yuma.” Figure A-36 presents the results for each of the housing types based on response from city of Yuma residents. Key findings include:

- Medium-sized single family homes (between 1,500 and 3,000 square feet) were “appropriate in my neighborhood” for two-thirds of city of Yuma survey respondents.
- About a quarter of residents think gentle infill density like duplex and townhome products with the same height and setback as neighboring homes are appropriate in their neighborhood. A greater proportion support smaller lots and smaller single family homes in their neighborhood.
- Support for accessory dwelling units “in my neighborhood” doubles if the occupants are restricted to family members.
- About one in four respondents think smaller apartment buildings with nine or fewer units are appropriate in their neighborhood.
- Nearly one-third of respondents consider apartment buildings up to five stories and buildings with five or more stories “not appropriate in Yuma”. But, about three in five respondents think these denser housing types, located close to bus stops or major roads, are appropriate in Yuma, just not in their neighborhood.

**Figure A-36.**

**For each housing type, state whether the type of housing is appropriate in your neighborhood, other city of Yuma neighborhoods or not appropriate in the city of Yuma. *City of Yuma Residents Only***

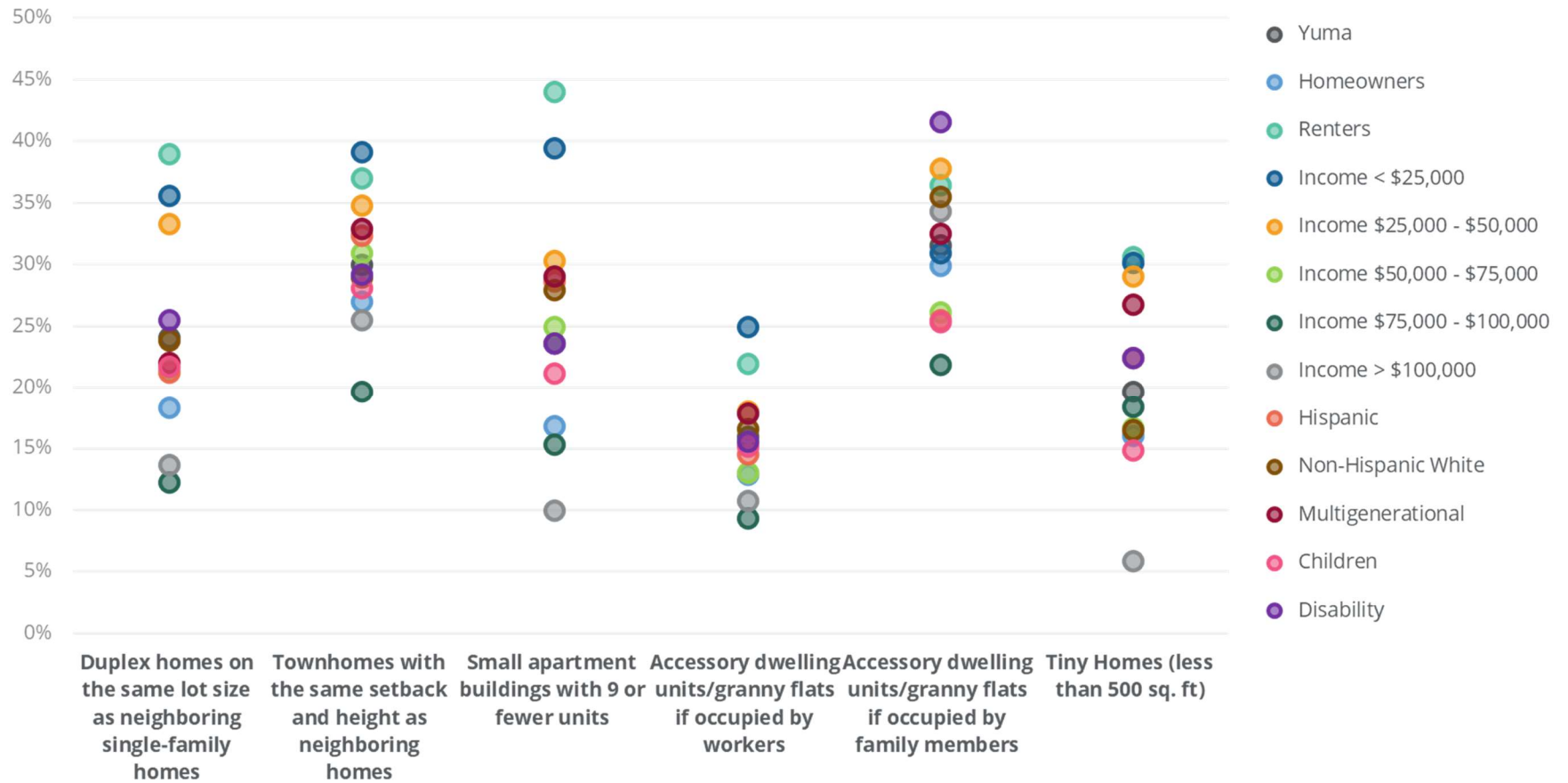


Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Appetite for gentle density.** Figure A-37 presents city of Yuma residents' appetite for gentle density housing types in their neighborhood by tenure, income, and respondent characteristics. As shown, support for the different forms of gentle density varies demographically and socioeconomically.

- In general, higher income households are less likely than other city of Yuma households to consider the different types of gentle density to be appropriate in their neighborhood. In contrast, renters and lower income households are more likely to support these housing types.
- Households that include a member with a disability are most likely to be supportive of accessory dwelling units if occupied by a family member.
- While not particularly supportive, homeowners are most likely to be supportive of accessory dwelling units if occupied by Yuma workers.
- Renters and low and moderate income households are most likely to consider duplex homes and townhomes to be appropriate in their neighborhood.

**Figure A-37.**  
**Appetite for Gentle Density Housing Types in My Neighborhood, Yuma Residents**



Note: Data are restricted to residents of Yuma. Figure shows the percentage of each respondent group who indicated that the type of gentle density shown is “appropriate in my neighborhood.”  
 Source: Root Policy Research from the 2020 Yuma County Resident Housing Choice Survey.

**Unique South County factors.** Throughout the community engagement process, South County stakeholders and residents emphasized the cultural and economic differences between South County communities and the city of Yuma and northern Yuma County. Among these differences are South County's strong economic, social, and cultural ties with Mexico, employment concentrated in agriculture, and the lack of focus on housing issues in South County from County commissioners as well as local elected officials in San Luis, Somerton, and Wellton. Recognizing these differences and incorporating them into countywide plans is critical to successfully responding to South County resident needs.

- *"There are very distinct cultural differences in South County that aren't taken into account at the county level. Everything is decided from Yuma, and oftentimes South County is the step-child. Our needs are different, but they are not the priorities. So, their needs are not represented. Have some, but not enough to make an impact." (South County stakeholder focus group participant)*
- *We are a very proud community. And we don't say we don't have a place to live. Take pride in showing we're still standing. Contrary to belief, people don't want to be seen as taking assistance, or being beggars. There's a lot of cultural characteristics and they are not understood. In a community where 70 percent of the county is Latino, it's not known, the differences. (South County stakeholder focus group participant)*
- *"Local politics they don't look at housing issues, as closely as you think they should." (South County stakeholder focus group participant)*
- *"San Luis is growing so fast. And, the seasonal employment doesn't help." (South County stakeholder focus group participant)*

## **Recommendations from Residents and Stakeholders**

Stakeholder and resident focus group participants provided their recommendations for housing and community development priorities. These ranged from affordable housing, including affordable homeownership, to utility assistance, case management and other services to maintain stability in housing, crime prevention and safety improvements in Mesa Heights, increased visibility of housing issues by San Luis and Somerton elected officials, and more resources dedicated to homelessness services.

### **Social services providers, homeless services, and Mission guests—**

- *"Affordable housing;"*
- *"Childcare;"*
- *"Housing counseling;"*
- *"A bus stop closer to the Mission (closest is two blocks away);"*

- *“Increased funding for the Mission. The funding the Mission receives does not seem commensurate with the level of services provided;”*
- *“More funding for homeless outreach;”*
- *“Funding for case management when guests leave the Mission;”*
- *“More services and support for geriatrics;” and*
- *“Veterans court and mental health court.”*
- *“The whole continuum from homelessness to DV to supportive services. We have a lot of COVID funding for eviction prevention, but that needs to continue. Housing counseling, pre-purchase, eviction prevention, utility assistance, elder abuse is increasing.”*

### **Residents with disabilities, including mental illness and recovery from substance use disorders—**

- *“Upgrade apartment building conditions;”*
- *“Invest in a community center that is similar to the senior center, but for people with disabilities;”*
- *“More patrol units in the evening and night in Mesa Heights and invest in crime prevention measures;”*
- *“Pay attention to pedestrian safety, enforce crosswalks;” and*
- *“Fix potholes.”*

### **South County stakeholders—**

- *“If I were the king of HOME—housing rehab would be the #1 priority in Somerton or San Luis. It’s the #1 need, and there’s not enough money for new construction in San Luis. #2 priority is downpayment assistance. Even though we have it, the guidelines don’t help a lot. The prices on homes—demand is so high, and prices are so high—that even giving a \$20,000 downpayment, families don’t qualify for homeownership.”*
- *“Each municipality has a seat on the board of the Consortium; the seat should be held by people who understand housing needs. That will really help.”*
- *“Start looking into some funds that might be able to establish some kind of program to help the residents of South Yuma county. City of San Luis have not used CDBG for any housing activities for many years. It all goes for roads and infrastructure. Could be used for rehab, blight improvement.”*



- *“Somerton should apply for HOME funds and start a rehab program fund here. Should use funds for rehab in Somerton and San Luis. But there are reasons why they have not done it before. It may be a lack of capacity on the housing side to manage a home rehab program, compared to what they do for the roads. The Council did not see the value of rehabbing homes rather than roads. Lack of understanding of having better housing for the residents.”*
- *“The HOME allocation is [not a lot]. So, the nonprofits within the Consortium, have to go to the State, but you’re automatically punished by 20 points because you’re supposed to go local Consortium. State HOME funds are extremely competitive. Yes, the need is so great and so dire in South County, that South County nonprofits can overcome the 20 point deficit—that’s how bad the problem is.”*

### **San Luis Residents (conducted in Spanish)—**

- There is a perception that most of the housing help goes toward farmworkers while other service workers cannot afford to live in San Luis and do not qualify for any subsidies.
- Residents would like to see an expansion in the income range that qualifies for help and subsidies to purchase a home—this would incentive building in the city and bring in construction jobs. Many people want to stay; they do not want to commute from Mexico every day, and this would keep their money here. Look into having an Infonavit program like in Mexico.
  - *“We need a program to help people who work in public service jobs.”*
  - *“We need a program for dignified housing that allows us (single women and single women without kids) to pay an amount we can afford.”*
- Food banks have been very helpful.
- Persons earning above the median do not qualify for help but cannot afford energy bills in the summer—utility assistance is needed.
- Residents also recommend an auxiliary program to help people stay in their homes. COVID is causing people to lose their homes. Even a program that allows residents to refinance would be helpful. Help has to last longer (around a year) to really allow people to get back on their feet.