



**CITY OF BELOIT
ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING**

Prepared for the

*City of Beloit
Neighborhood Planning Division*

By

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I. Introduction and Summary of Analysis

Introduction

In late 2003 the City of Beloit engaged the services of MSA Professional Services, Inc. of Madison, Wisconsin to complete the Analysis of Impediments to Fair Housing (AI). The MSA staff worked at the direction of the Community Development Director, Julie Christensen, and worked with a small steering committee that included representatives of the Equal Opportunities and Human Relations Commission, the Human Resources Department, the Community Development Authority, the Beloit Housing Authority, Neighborhood Housing Services, and representatives from the community's nonprofit sector.

The AI is a requirement of the Affirmatively Furthering Fair Housing certification that all recipients of Community Development Block Grant funds must make to the U.S. Department of Housing and Urban Development (HUD). The AI is a review of impediments to fair housing choice in the public and private sector. The AI involves:

- A comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

HUD defines impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

The scope of the AI is broad. It covers the full array of public and private policies, practices, and procedures affecting housing choice. The AI:

- Serves as the substantive, logical basis for the Fair Housing Planning process
- Provides essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates
- Assists in building public support for fair housing efforts both within an entitlement jurisdiction's boundaries and beyond.

- source: *Fair Housing Planning Guide*,
U.S. Department of Housing and Urban
Development, Vol.I

The AI utilized a focus group and stakeholder interview process to collect contextual information. While the City's previous AI (1996) relied on a community survey, which provided valuable insights, this effort seeks to "drill down" to explore community issues in more depth. Approximately twelve individuals representing a cross-section of the community's financial and development institutions, nonprofit organizations, educational institutions, faith-based organizations, volunteer and activist groups participated in this process. In order to encourage an open and deep dialogue, the participants were promised that the results of these interviews remain confidential. However, the content is reflected throughout this report without attribution.

The consultant also reviewed a number of secondary data sources – U.S. Census data, Home Mortgage Disclosure Act data, City of Beloit Property Assessment Files, and other local and State data sets. The results are a robust framework of tables and maps that are incorporated into this document.

The findings of the previous AI remain true today. The 1996 AI identified five impediments to fair housing choice:

- A concentration of low-income households in four census tracts (the CDBG target area)
- Difficulties among low-income households in purchasing homes
- A lack of effective communication between landlords, tenants, and housing advocates
- Difficulty of low-income households to secure rental housing due to such things as landlords requiring both first month's rent and security deposit, utilization of the minimum income rule, poor credit rating, poor references, etc.
- Difficulty of low-income households to secure rental housing due to landlord's previous experiences with low-income persons and the negative behavior associated with some low-income persons, which can have a disproportionate impact on minority groups.

Summary of Analysis

In addition to validating the findings of the previous AI, this report identifies barriers in the following areas:

- Fiscal Policy: Predatory lending, particularly by third party brokers, is a significant and growing problem within the community. The availability of low-interest loans and 125% mortgages have created situations where low and moderate income households may find themselves in "over their heads". As a result, there are a growing number of foreclosures. A second problem is the lack of traditional mortgages for people who lack credit histories (e.g., New Americans), and who may rely on secondary purchasing arrangements and land contracts. Third, there is a need for creative financing to help make accessibility improvements to Beloit's older housing stock that will accommodate Beloit's increasing population of elderly and disabled residents. Finally, there is a need for increased collaboration and cooperation between financial institutions and housing advocates. Joint efforts could increase educational opportunities, foster creative financing mechanisms, help

to target specific areas of the City where mortgage origination rates are below the remainder of the City, and help the industry in efforts to self-police (e.g., against predatory lenders, unscrupulous developers/realtors, etc.).

- Physical Development: The City has progressive development ordinances and policies that do not serve as barriers to affordable housing; however, there is a need to promote the use of their more innovative facets. For example, the zoning ordinance includes extensive provisions for developing Traditional Neighborhood Development (TND) and Planned Unit Development (PUD) projects, both of which have the capability to provide quality, mixed-use environments that integrate market rate and affordable housing into a planned community setting. The City and development community need to find ways to educate their members, promote projects that will utilize these provisions, and construct projects. This may require the City's use of redevelopment powers to target such desired development. Finally, the City's CDA has recently initiated the Neighborhood Development Initiative (NDI) as a pilot program in two neighborhoods. This comprehensive program includes the purchase, rehabilitation, and resale of homes to owner-occupants by the City. It will also include reconstruction of streets, curbs, sidewalks, and improved lighting and landscaping. The program areas will then be targeted for enhanced code enforcement, along with the removal of some obsolete properties that will be land-banked for future use.

- Governances & Administration: While the City articulates a clear intent to involve a diverse range of citizens in the daily business of government through a wide variety of boards and commissions, it has not created a systematic way of doing so. There is a need to collect information regarding the composition of boards and commissions, and to find ways to encourage people from diverse backgrounds to participate in local government. Second, the City needs to establish a more effective means of investigating and testing for discrimination, particularly in the rental housing industry. The City should thoroughly review the efficacy of the current complaint process administered by the Equal Opportunities and Human Relations Commission, the Human Resources Department, and a consultant. This program does not seem to be moving a significant number of cases to prosecution or mediation. In addition, the City should seriously consider a testing program. This is particularly important due to the fact that the current complaint department is not attracting a proportionate share of complaints from the growing Hispanic population. Finally, there is a need for the City to systematically review its needs and process for assuring that bi-lingual staff and translated materials are available.

- Community Support and Development: The City has initiated a number of important programs, such as the Campaign to Promote Racial Justice, Study Circles, and Youth programs. The City needs to increase its commitment to these programs through enhanced financial and personnel allocations and more partnerships with community organizations. In addition, the City could greatly enhance the efficacy and efficiency of housing and community services by serving a central role as a community catalyst and convener. In this capacity, the City recognizes that there are

a wide range of community resources that could be more effectively targeted through combined efforts and collaboration.

Beloit has significant challenges ahead. The City has an inordinate number of publicly subsidized families and housing units; the building stock is unusually old; income levels lag behind the surrounding area and the State; building and economic activity are sluggish. On the positive side, Beloit has a truly affordable cost of living and some of the lowest housing costs in the Midwest; they have a good location on the interstate highway system and are within a reasonable distance to major centers of population and commerce; the City has a wonderful riverfront amenity and a downtown area that has the potential for quality redevelopment. The City's update of its Consolidated Plan will provide the opportunity to engage new partners in community development endeavors and to move in new directions, where necessary. While the City faces many challenges, challenges that many of its peer communities don't share, they have taken a progressive and often innovative approach that will continue to improve the quality of life for all residents of the community.

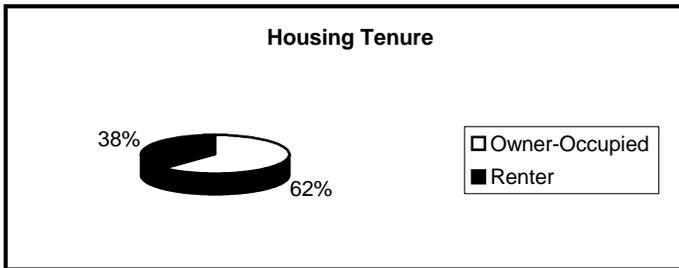
II. City of Beloit Background Data

Housing Profile

Census-Derived Data

Number of Units: The 2000 Census recorded 14,262 total year-round housing units of which 892, or 6.3 percent, were vacant.

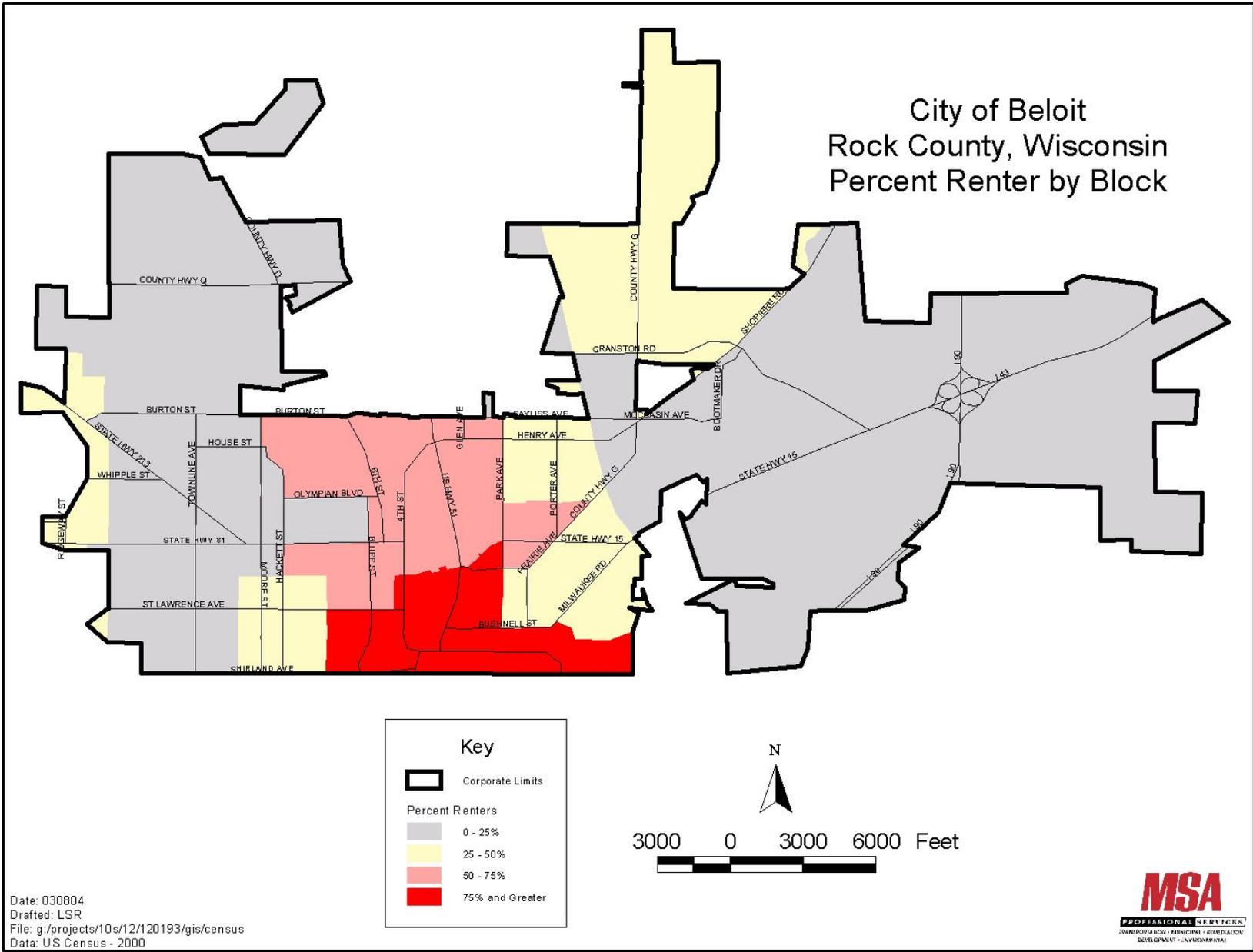
Owner-Occupied Housing: In 2000, there were 13,370 occupied housing units. Of these, 8,277 or 61.9 percent were owner-occupied. Owner-occupied units include single-family detached housing (95%), single-family attached (1%), duplex (2%), three or more units (3%),



and mobile homes (1%). Most single-family housing (88%) was built before 1970. More recently, 419 homes (5%) were constructed between 1990 and March 2000. Median home value was \$68,200 and median monthly mortgage costs were \$763 in 2000.

Figure 2-1: Housing Tenure

Rental Housing: In 2000, renters accounted for 5,093 units, or 38.1 percent of 13,370 occupied housing units in the City of Beloit. Most rental housing is in configurations of less than 4 units (74%) with single-family detached units the most prevalent rental dwellings (40%). Rental housing with 20 units or more accounted for 15 percent of total rental dwelling units. The following map shows percentage of renters by Census block. The red indicates areas where over 75% of the housing units are rental units.



Map 1: Percent Renters by Block

Age of Housing: Almost 90 percent of the available housing structures in the City were built before 1980 (12796/14253). The median year residential structures were built is 1952 overall, with owner-occupied structures built in 1951, and renter-occupied structures in 1954. See Table 2-1 below.

Table 2-1: Year Structure Built

Year	Number	Percent
1990-March 2000	833	5.9%
1980-1989	624	4.4%
1970-1979	1,426	10.0%
1960-1969	2,094	14.7%
1940-1959	4,439	31.1%
1939 or earlier	4,837	33.9%
Total	14,253	100.0%

2000 Census SF-3

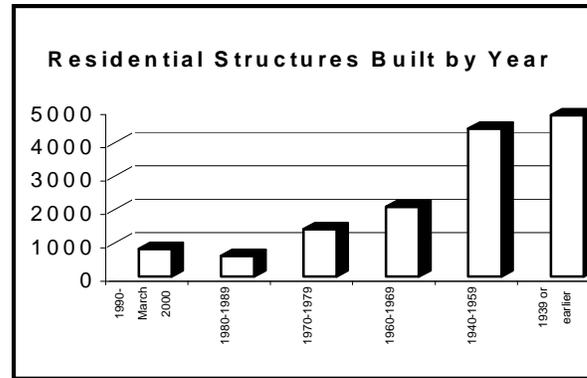


Figure 2-2: Residential Structures by Year Built

Housing Cost: Median home value in 2000 was \$68,200. Almost 85 percent of the housing stock is valued under \$100,000.

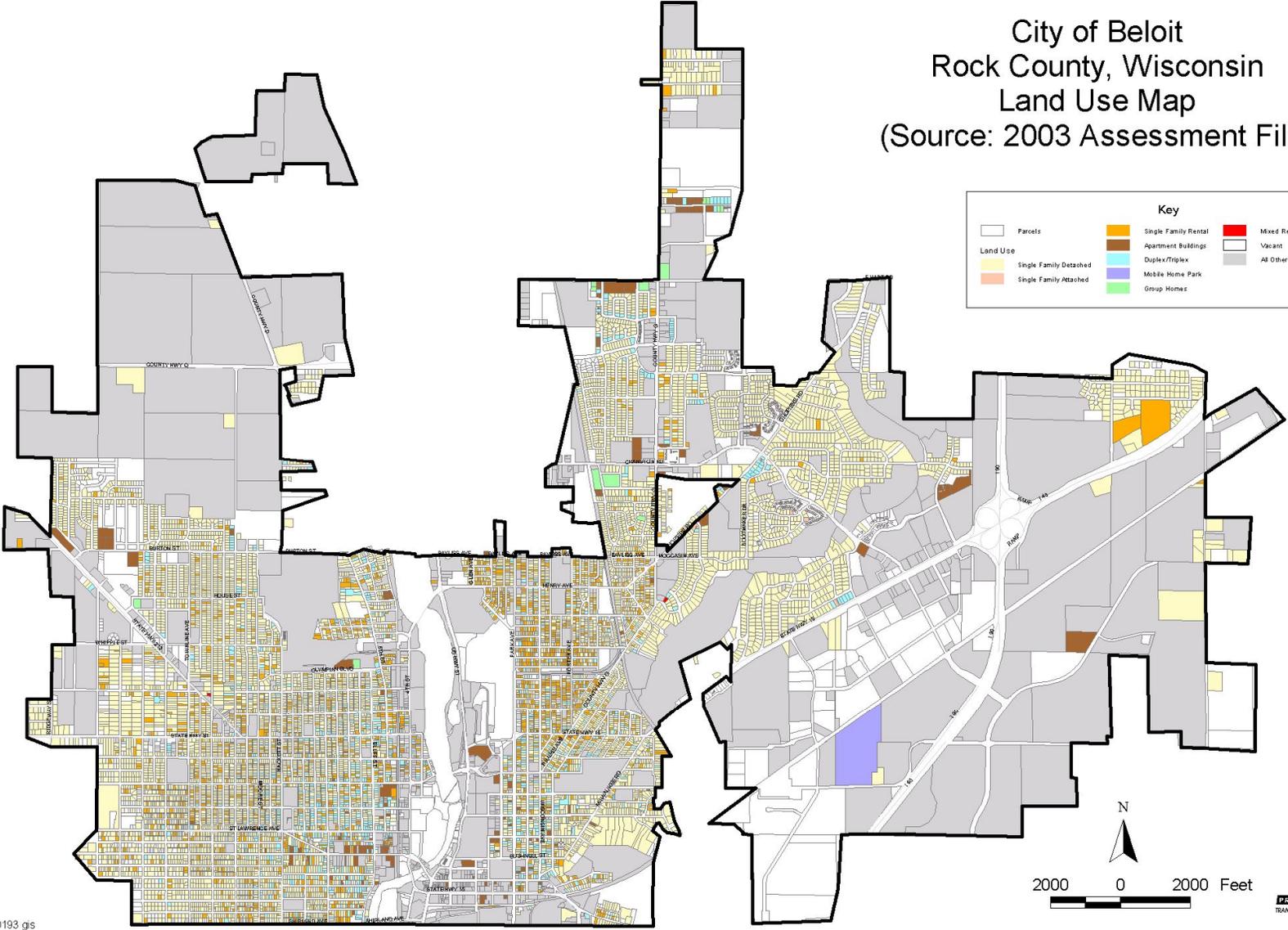
Gross Rent: The Census Bureau defines gross rent as the amount of the contract rent plus the estimated average monthly cost for utilities (electricity, gas, and water and sewer) and fuels (oil, coal, kerosene, wood, etc.) which may be paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differences that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. The median gross rent in Beloit was \$509 in 2000, with almost 88 percent of renters paying less than \$749 per month. Census figures indicate gross rent as a percentage of household income in 1999 included almost 29 percent of renters paying 35 percent or more of their household income on housing. This compares to less than 12 percent of homeowners paying 35 percent or more of their household income on selected monthly housing costs.

Locally-Derived Data

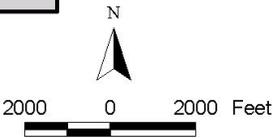
Property Tax Assessment Data: The City's property assessment database (2003) was reviewed and analyzed for the purposes of completing this report. This analysis provides a "snapshot" of the City's housing stock. The map that follows provides an overview of the residential land use based on the City's assessment database.

There were approximately 14,402 total units of residential property reviewed. The total value (including land and improvements) of these properties is \$856,405,950. The average unit value was \$74,173 and the median was \$63,700. Of this amount, improvements (structures) contributed \$741,826,350 or approximately 87% of the total value of residential property in the City.

City of Beloit
 Rock County, Wisconsin
 Land Use Map
 (Source: 2003 Assessment File)



Key		
Parcels	Single Family Rental	Mixed Residential/Commercial
Land Use	Apartment Buildings	Vacant
Single Family Detached	Duplex/Triplex	All Other Uses
Single Family Attached	Mobile Home Park	
	Group Homes	



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 Date: 03/05/04
 File: g projects 120193 gis

Map 2: Land Use

Approximately 73% of the housing stock (10,506 units) was classified as “single family” (including single family detached, single family attached, and single family rental). The average value (land and improvements) was \$80,599 while the median was \$64,500. A significant portion, 81% (8,460/10,506) of single family housing falls into the “single family detached” category. The average value (land and improvements) was \$76,358 while the median was \$69,400. “Single family attached” housing accounted for just 2% (257/10,506) of the single family housing stock. It is interesting to note that these products had higher values than the “detached” stock, with an average value of \$85,585 and a median value of \$74,500. The City has approximately 17% (1,789/10,506) of its single family housing stock available as rental units. The values on these units are approximately sixty percent of the value for the single family attached stock. The average value of “single family rental” was \$43,956 while the median was \$41,600.

Approximately 27% (3,886/14,402) of the housing stock was classified as “multi-family” (including apartments, duplex and triplex homes). The total value for multi-family properties was \$108,895,800, representing 13% of the total value of residential property in the City. Apartments represent approximately 14% (2,026/14,402) of the total residential units and were contained in 137 properties throughout the City. The average assessed value per property was \$396,793 and the median value was \$125,600. The total value for apartment properties was \$54,360,700, which equates to a per unit value of \$26,832.

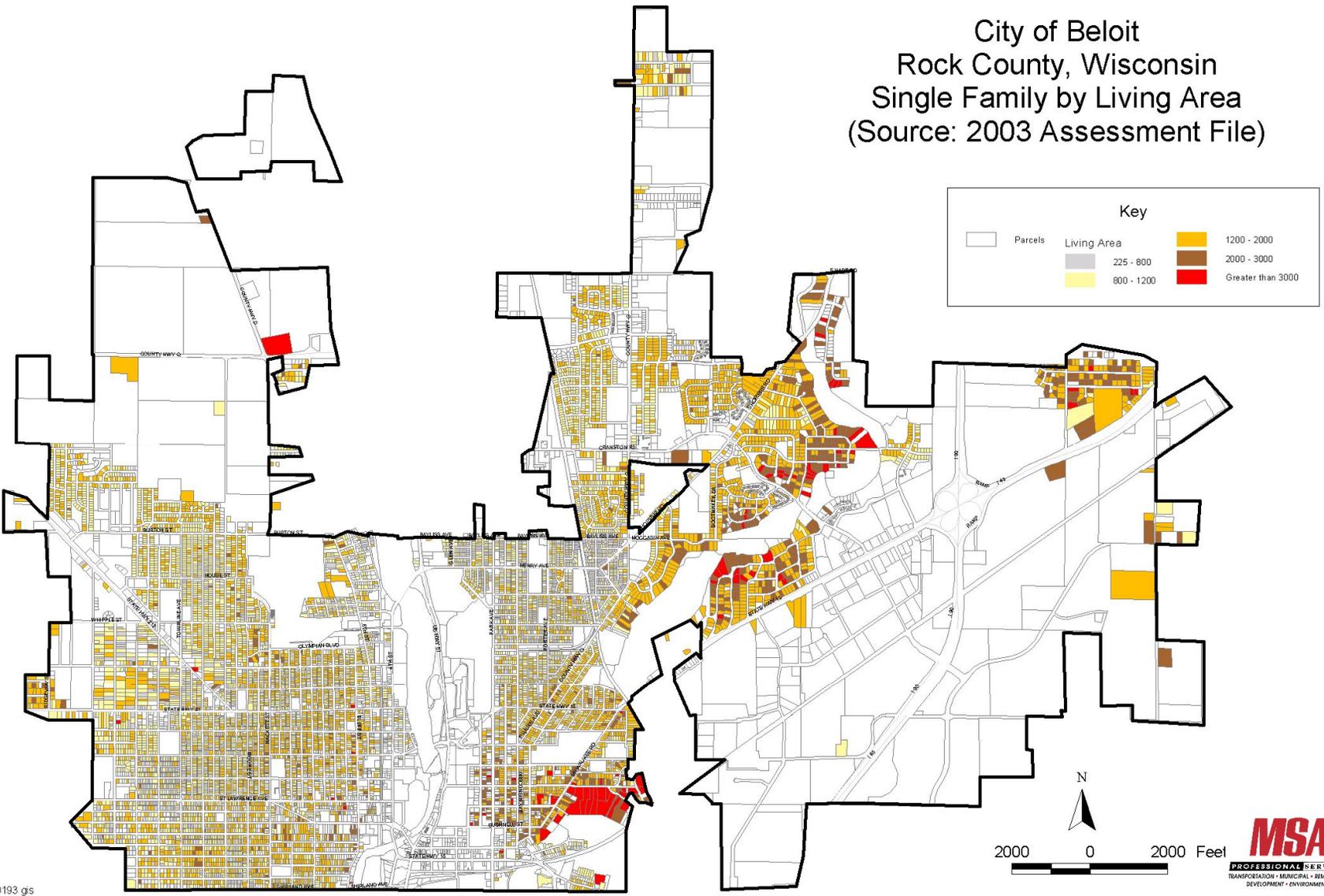
There are 816 duplex properties generating 1,632 units. Duplexes constitute about 11% of the total housing units in the City. The total value of duplex properties was \$49,017,100, or approximately \$30,035 per unit. The average value per duplex property (two units, land and improvements) was \$40,070 while the median value was \$55,350. Triplex properties were a much smaller proportion of the residential housing stock with only 76 properties (representing 228 living units). The total value of triplex properties was \$5,518,000, or about \$24,200 per unit. The average value per triplex property (three units, land and improvements) was \$72,605 while the median value was \$61,200.

In conclusion, the City has (a) a very high proportion of single family residential units and (b) the values tend to be very moderate (see discussion of “housing sales”, below, for comparative data).

In addition, the assessment files included approximately 14 group home properties representing 290 units, 11 mixed-use properties, and 708 vacant residential properties.

The City also requires that rental properties be registered and permitted. A review of this database reveals 2,737 units registered. This number is well under the 3,815 units that can be estimated as rental properties (1,789 single family rental and 2,026 apartments). While the two databases are maintained by separate City departments, it may be useful to combine the files in order to help target code enforcement activities.

City of Beloit
 Rock County, Wisconsin
 Single Family by Living Area
 (Source: 2003 Assessment File)

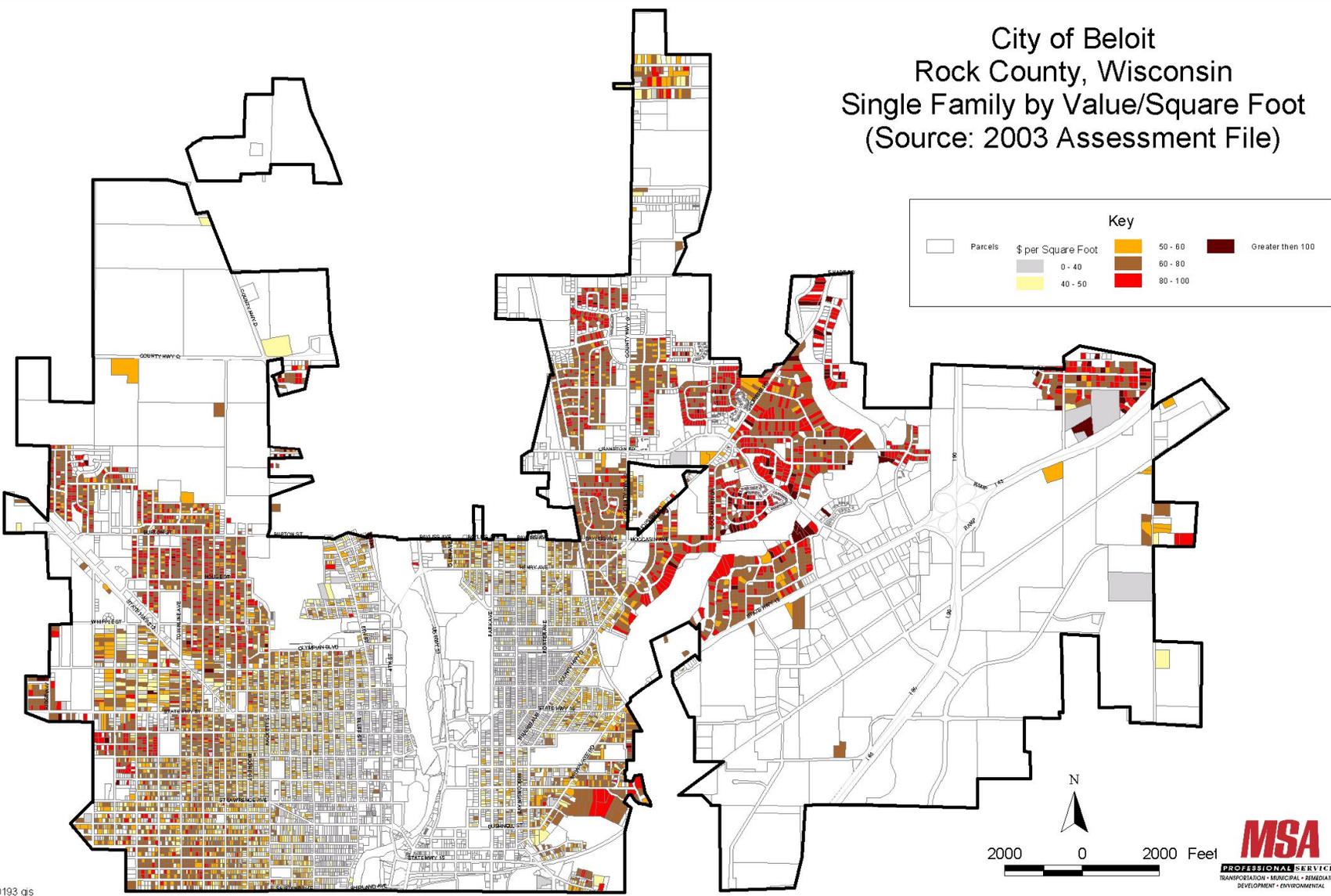


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Map 3: SF Living Area

City of Beloit
 Rock County, Wisconsin
 Single Family by Value/Square Foot
 (Source: 2003 Assessment File)

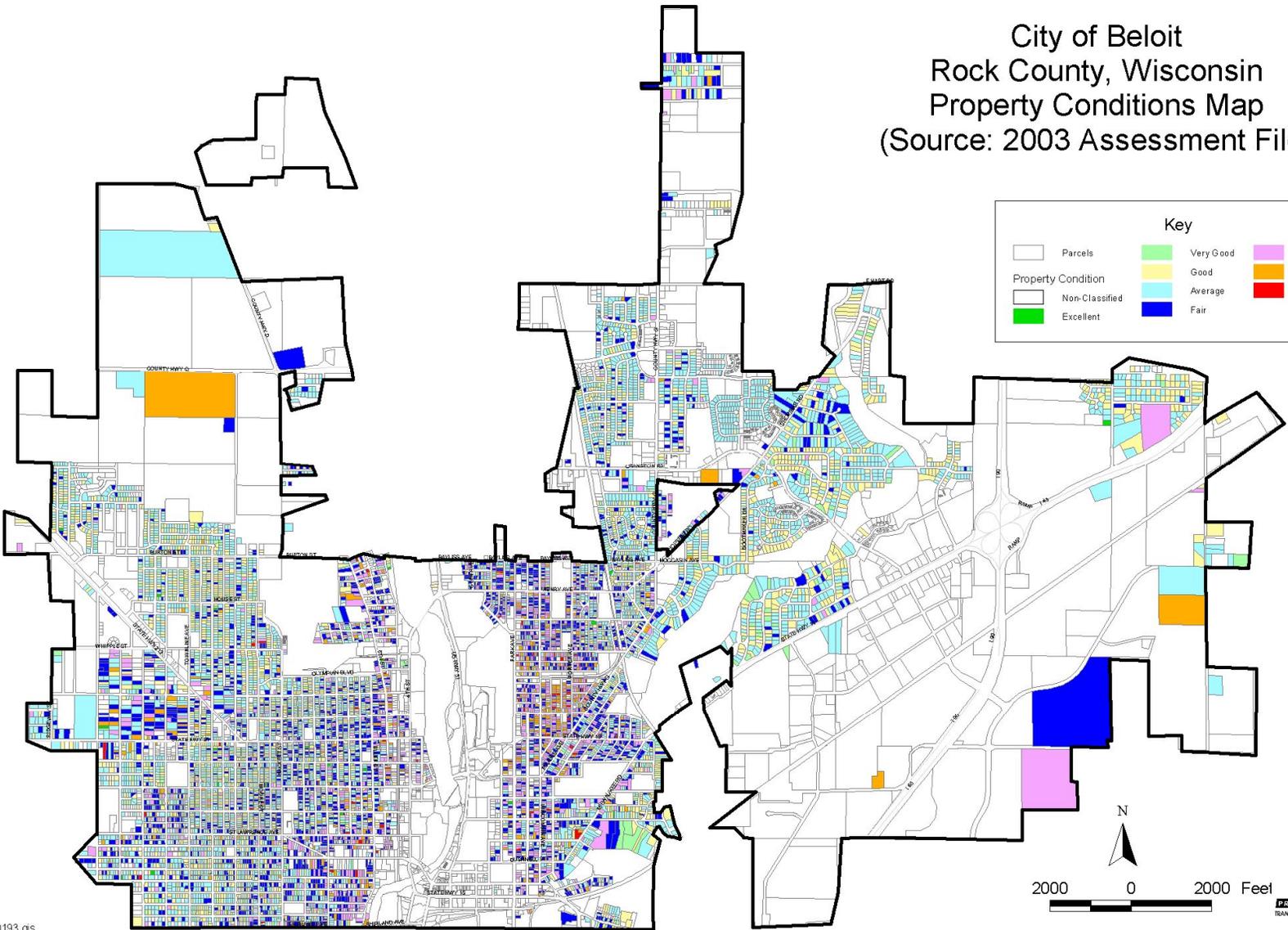


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Map 4: SF Value per Square Foot

City of Beloit
 Rock County, Wisconsin
 Property Conditions Map
 (Source: 2003 Assessment File)

Key			
	Parcels		
	Very Good		Poor
	Good		Very Poor
	Non-Classified		Average
	Excellent		Fair
			Unsound



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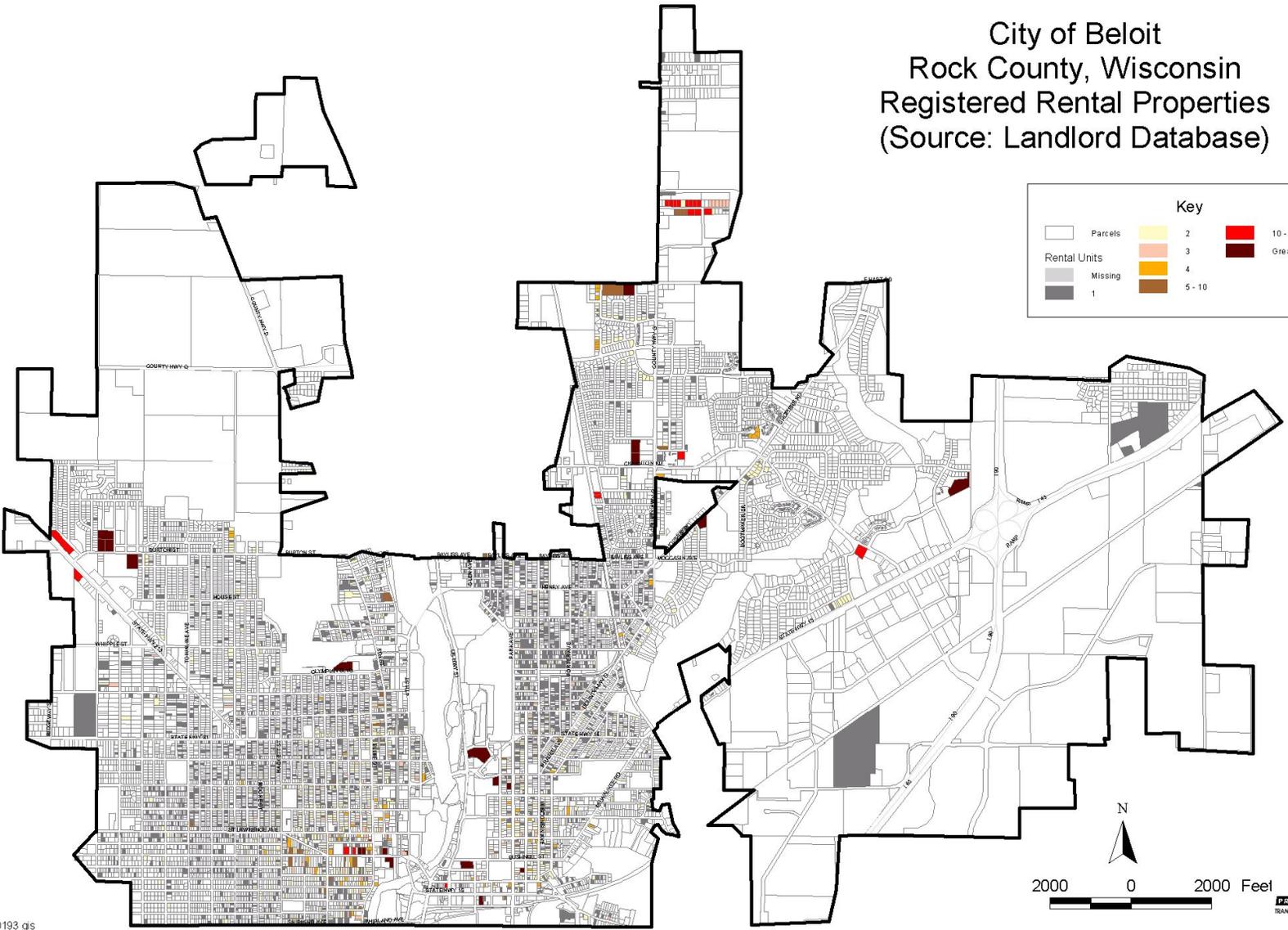


Map 5: Property Conditions

MSA Professional Services, Inc.

ANALYSIS of IMPEDIMENTS to FAIR HOUSING
 BELOIT, WISCONSIN
 July 2004

City of Beloit
 Rock County, Wisconsin
 Registered Rental Properties
 (Source: Landlord Database)



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Map 6: Registered Rental Properties

MSA Professional Services, Inc.

ANALYSIS of IMPEDIMENTS to FAIR HOUSING
 BELOIT, WISCONSIN
 July 2004

New Housing Construction: Since the second quarter of 2000, the City of Beloit has added 209 residential buildings. Of these, 84 percent (176) were single-family homes. See Table 2-2. From 1990-1998, there were 634 residential buildings constructed. A majority of these, 45 percent (286), were single-family homes. During this same period, an additional 280 structures (44%) were built containing three or more units.

Table 2-2: Building Permit Data, 2000 – 2003

Year	Single-Family	2 Units	3+ Units	Total Res. Construction
2000	44	3	11	58
2001	28	1	7	36
2002	60	2	5	67
2003	52	4	5	61
Total	184	10	28	222
% of Total	83%	5%	13%	

*City of Beloit, 3-4-04
Permits issued; not total units constructed
Totals may not sum due to rounding*

Housing Sales: According to data provided by the City of Beloit’s Assessor’s office, the number of homes sold each year has remained relatively stable over the past seven years, ranging from a low of 508 in 2001 to 536 in 2003. However, during this period, the median sale price has continued upwards. In fact, the median sales price has increased by approximately 47 percent since 1997 (see Table 2-3). The increase from 2002 to 2003 was 10.5 percent. This rate is generally in line with median price increases reported by the National Association of Realtors for the U.S. and Midwest regions. These increases reflect the availability of low interest mortgages that fueled a record year in 2003. Of significant note is that the overall prices remain significantly below those of surrounding areas. The Realtors Association of South Central Wisconsin reported a median sales price of \$105,000 for homes in the Janesville-Beloit metropolitan area in the first half of 2003, significantly lower than the \$185,000 in Dane County (*source: US. Housing Market Conditions reports, summer 2003*). The National Association of Realtors reports median 2003 figures as \$170,000 for the U.S., \$141,300 for the Midwest, \$188,700 for Madison, \$182,100 for Milwaukee, and \$114,400 for Rockford metropolitan areas. Clearly, housing costs in the Beloit area remain below average.

Table 2-3: Median Sales Prices, 1997-2003

Year	Median Sales Price	Number of Sales
1997	\$56,028	553
1998	\$62,293	514
1999	\$66,092	532
2000	\$68,100	519
2001	\$69,900	508
2002	\$74,500	536
2003	\$82,300	514
Average	\$68,459	525

City of Beloit, 3-2004
http://www.ci.beloit.wi.us/home/assessor/statistical_data.asp

Home Mortgage Disclosure Act Data: The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Board’s Regulation C. This regulation provides the public loan data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities; helping public officials in distributing public-sector investments so as to attract private investment to areas where it is needed; and in identifying possible discriminatory lending patterns. This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Institutions that meet minimum thresholds (\$33 million in assets for depository institutions, \$10 million in assets for non-depository institutions, or 100 or more home purchases originated in 2003) must provide a variety of data regarding the disposition of applications for mortgage and home improvement loans in addition to data regarding loan originations and purchases; and are required to identify the race, sex, and income of loan applicants and borrowers (as well as the physical location of the subject property in census geography and explanations regarding loan decisions). This information is compiled by the Federal Financial Institutions Examinations Council (FFIEC), which generates aggregate and disclosure reports for each metropolitan area in the United States. Data sets for calendar years 1997-2002 are available at www.ffiec.gov and other records are available through regional depositories (usually libraries or regional councils).

Appendix A contains tables describing home lending data for the Janesville-Beloit MSA. These tables only include information on loans for 1 to 4 family housing units and are organized by loan type: HMDA table 5-1 includes information on FHA, FSA/RHS, and VA purchases; HMDA table 5-2 includes information on the disposition of conventional home purchases; HMDA table 5-3 refers to refinancing loans. A summary table is also included. Due to the large amounts of data available, extensive analyses are possible; however, several trends characterize the lending environment in the area.

- The income gap between white and non-white and the Hispanic population is evident. The proportion of applications originated by white persons increases with the higher income classifications.
- Due to a significantly high percentage of cases where race was not reported (13% of all loan applications), it is not possible to draw definitive conclusions regarding under-representation of race/ethnicity in loans. However, it appears that there is a

trend towards under-utilization of home loans by minorities. For example, 82.6% of applications received were from white persons, who constitute 91% of the MSA population; 1.1% of applications were from black persons, who constitute 4.6% of the MSA population; and 1.3% were from Hispanic persons, who constitute 3.9% of the MSA population. Simply taking the ratio of application percentages to MSA population percentages reveals white applications at 91% ($82.6\% \div 91\%$), blacks at 24% ($1.1\% \div 4.6\%$), and Hispanics at 33% ($1/3\% \div 3.9\%$).

- Hispanic and black families take advantage of federally-sponsored loan programs (FHA, VA, etc.) at rates significantly higher than whites.
- White families are more frequent consumers of conventional home purchase and refinancing products than blacks and Hispanics.
- Application denials across all income categories are significantly higher for minorities than for whites. In general, denial rates are 12% or more higher for blacks and Hispanics than for whites across all income categories. Applications for black families are denied nearly twice as often as whites (15.8% versus 8.2%) and Hispanics nearly two-and-a-half times the rate of whites (20.1% versus 8.2%) across all products.
- The differential in denial rates on refinancing are even more pronounced, with applications from black families denied 19.4%, 23.4% from Hispanics, and 8% from whites.

Table 2-4: Beloit HMDA Data by Tract

Census Tract	Loan Type (1-4 family dwellings only)	Loan Originated	Approved, Not Accepted	Application Denied	Application Withdrawn	File Closed, Incomplete
15	Home Purchase	2 (100%)	0	0	0	0
	Refinance	1 (50%)	0	1 (50%)	0	0
	Home Improvement	1 (100%)	0	0	0	0
16	Home Purchase	66 (77%)	0	12 (14%)	6 (7%)	2 (2%)
	Refinance	156 (62%)	9 (4%)	61 (24%)	16 (6%)	11 (4%)
	Home Improvement	23 (56%)	3 (7%)	12 (29%)	2 (5%)	1 (2%)
17	Home Purchase	78 (72%)	3 (3%)	12 (11%)	11 (10%)	5 (5%)
	Refinance	197 (60%)	12 (4%)	65 (20%)	41 (13%)	13 (4%)
	Home Improvement	25 (52%)	3 (6%)	15 (31%)	4 (8%)	1 (2%)
18	Home Purchase	48 (73%)	2 (3%)	6 (9%)	8 (12%)	2 (3%)
	Refinance	115 (59%)	10 (5%)	47 (24%)	11 (6%)	11 (6%)
	Home Improvement	16 (48%)	4 (12%)	13 (39%)	0	0
19	Home Purchase	48 (71%)	7 (10%)	6 (9%)	3 (4%)	4 (6%)
	Refinance	130 (59%)	11 (5%)	49 (22%)	22 (10%)	7 (3%)

Table 2-4: Beloit HMDA Data by Tract

Census Tract	Loan Type (1-4 family dwellings only)	Loan Originated	Approved, Not Accepted	Application Denied	Application Withdrawn	File Closed, Incomplete
	Home Improvement	12 (43%)	1 (4%)	13 (46%)	2 (7%)	0
20	Home Purchase	76 (84%)	3 (3%)	6 (7%)	6 (7%)	0
	Refinance	192 (61%)	15 (5%)	61 (19%)	34 (11%)	15 (5%)
	Home Improvement	34 (74%)	3 (7%)	8 (17%)	1 (2%)	0
21	Home Purchase	63 (77%)	3 (4%)	12 (15%)	4 (5%)	0
	Refinance	177 (61%)	18 (6%)	53 (18%)	30 (10%)	10 (3%)
	Home Improvement	31 (76%)	3 (7%)	6 (15%)	1 (2%)	0
22	Home Purchase	25 (64%)	2 (5%)	6 (15%)	5 (13%)	1 (3%)
	Refinance	134 (72%)	11 (6%)	23 (12%)	13 (7%)	5 (3%)
	Home Improvement	6 (67%)	0	3 (33%)	0	0
23	Home Purchase	32 (62%)	5 (10%)	11 (21%)	3 (6%)	1 (2%)
	Refinance	88 (56%)	7 (4%)	34 (22%)	22 (14%)	7 (4%)
	Home Improvement	5 (42%)	3 (25%)	3 (25%)	1 (8%)	0
24	Home Purchase	52 (79%)	3 (5%)	5 (8%)	5 (8%)	1 (2%)
	Refinance	206 (77%)	15 (6%)	25 (9%)	15 (6%)	5 (2%)
	Home Improvement	24 (80%)	3 (10%)	1 (3%)	2 (7%)	0
25	Home Purchase	56 (85%)	3 (5%)	3 (5%)	1 (2%)	3 (5%)
	Refinance	102 (72%)	5 (4%)	15 (11%)	13 (9%)	7 (5%)
	Home Improvement	18 (56%)	1 (3%)	5 (16%)	7 (22%)	1 (3%)
26.01	Home Purchase	97 (82%)	8 (7%)	3 (3%)	7 (6%)	4 (3%)
	Refinance	219 (73%)	11 (4%)	32 (11%)	24 (8%)	15 (5%)
	Home Improvement	26 (68%)	4 (11%)	6 (16%)	2 (5%)	0
26.02	Home Purchase	45 (75%)	4 (7%)	10 (17%)	1 (2%)	0
	Refinance	203 (77%)	16 (6%)	18 (7%)	22 (8%)	3 (1%)
	Home Improvement	13 (62%)	1 (5%)	7 (33%)	0	0
TOTAL	Home Purchase	688 (76%)	43 (5%)	92 (10%)	60 (7%)	23 (3%)
	Refinance	1920 (66%)	140 (5%)	484 (17%)	263 (9%)	109 (4%)
	Home Improvement	234 (62%)	29 (8%)	92 (24%)	22 (6%)	3 (1%)
TOTAL		2842 (68%)	212 (5%)	668 (16%)	345 (8%)	135 (3%)

HMDA data for the City of Beloit, organized by census tract, was available for analysis. While this data isn't presented by racial or income category at this level of geography, it is possible to draw some conclusions using census tables (see Table 2-10 for demographics and Table 2-12 for income data). Table 2-4 contains information on loan dispositions within the City of Beloit for 1-4 family dwelling units. The table contains information for 4,202 loan applications, of which 68% (2,842) resulted in loans being originated. For analysis purposes, it is useful to compare the various loan actions within each census tract against the percentage for the entire city (by loan type). For example, in census tract 17, 78 home purchase loans were originated, 72% of the applications for properties in this area. This was comparable to, although slightly below, the City's overall origination rate of 76%.

Census tracts 15, 17, 18, and 23 represent areas where the non-white population is 25% or greater (see Table 2-10) and tracts 15, 16, and 18 are areas where the percentage of populations classified as very low income exceeds 25% or more (see Table 2-12). Table 2-4 indicates that, in general, loan origination rates are lower and application denials are higher than the City's summary figures. In addition, the same holds true for tract 23. One conclusion of this observation is that lending institutions are not meeting their fair lending obligations; however, it is equally likely that economic and/or physical conditions in these areas will necessitate the targeted use of subsidized lending tools.

Low-Income Housing: Table 2-5 lists Section 42 housing within the City of Beloit. Section 42 housing refers to that section of the Internal Revenue Tax Code that provides tax credits to investors who build affordable housing. Investors receive a reduction in their tax liability in return for providing affordable housing to people with fixed or lower income. The residents who live in Section 42 units must be income and program eligible, similar to residents who live in rental assistance developments. However, the amount of rent that a Section 42 resident will pay is capped at a fixed amount and includes utilities that are the resident's responsibility. In rental assistance programs, such as Section 8, the resident's contribution to the rent amount is based on 30% of his/her income and the remaining portion is paid by the federal government. Since the Section 42 Program is essentially a rent-control program, it does not provide direct governmental subsidies. In 1999, Beloit had six housing complexes participating in Section 42. This includes 77 family units, 259 senior units, and 45 others accounting for the highest concentration (46%) of the available Section 42 units within Rock County.

Table 2-5: Section 42 Housing in Beloit

Complex Name	Address	Housing Type	Year Built	# of Units	Monthly Rent
Watertower Place	532 Lawton Avenue	Family	1996	77	\$430-\$680
High School Apartments	220 W. Grand Avenue	Senior	1988	50	\$422-\$485
Hillcrest Apartment Homes	2200 Burton Street	Senior	1995	66	\$405-\$570
Olympian Hill Senior Apartments	431 Olympian Blvd.	Senior	1999	47	\$156-\$535
Brittan House (SRO)	608 4th Street	Other	1989	45	\$346

"Citywide Housing Market Analysis: Beloit Wisconsin" April, 2000

Note: In 1999, Janesville had 4 Section 42 "family" complexes; 4 "senior" facilities; 2 "other" facilities.

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Government-Subsidized Housing: Table 2-6 lists federally assisted rental housing located in the City of Beloit. Of the 2,439 federally assisted rental housing units in Rock County, approximately 46 percent (1,114 units) are located in Beloit. As shown in Table 2-6, the City of Beloit owns or is responsible for providing Section 8 subsidies to 65 percent (727 units) of the government-subsidized rental housing located in Beloit.

Table 2-6: Federally Assisted Rental Housing in Beloit

Complex Name	Address	Program	# of Units	Elderly	Family	Disabled
Grandview Apartments	241 Grand Avenue	S8/NC	45	32	13	0
Scoville Center	545 Public Avenue	S8/NC	151	135	0	16
Emerson Apts	930 Church Street	S8/NC	31	28	0	3
Scattered Sites	Beloit CDA	S8/VR	598	244*	354	0*
Scattered Sites	Beloit CDA	LIPH	91	0	88	3
Summerset Apts	2255 Burton St.	S/236	120	90	30	0
Parker Bluff Apts	220 Portland Ave.	LIPH	40	40	0	0
Totals:			1076	569	485	22

*The 244 elderly units include some unites for the disabled as these categories are grouped together in the Authority's tracking system.
 Source: "Citywide Housing Market Analysis: Beloit Wisconsin" April, 2000
 S8/NC: Section 8 New Construction and Substantial Rehab
 S8/VR: Section 8 Voucher
 S8/MR: Section 8 Moderate Rehab
 S/236: Section 236 HUD assistance to underwrite market-rate mortgage
 LIPH: Low-Income Public Housing, owned and operated by the Beloit Housing Authority

Note: In 1999, Rock County also had 31 units in Clinton; 161 units in Edgerton; 20 units in Evansville; 10 units in Footville; 935 units in Janesville; 92 units in Milton; 16 units in Orfordville; and there were an additional 60 units countywide.

Demographic Data, Income Characteristics, and Trends

Population Characteristics

The 2000 Census recorded 35,775 people residing in the City of Beloit. Total population is fairly static with a 2 percent increase since 1980. Population growth by racial category tells a different story however, with 240 percent growth in all races other than white (Caucasian) and black (African American) over the past two decades. Total population for blacks increased by 38 percent between 1980-2000, however, it decreased by 1 percent in the last decade. Total population for whites decreased by 12 percent since 1980. See Table 2-7.

Table 2-7: City of Beloit Population Change 1980-2000 by Race

Racial Category	1980	Racial Percentage	1990	Racial Percentage	2000	Racial Percentage	% Change 1980-2000	% Change 1990-2000
White	30,628	87%	29,104	82%	27,034	76%	-12%	-7%
Black	3,977	11%	5,575	16%	5,497	15%	38%	-1%
All Others	954	3%	1,585	4%	3,244	9%	240%	105%
Total Population	35,207	100%	35,573	100%	35,775	100%	2%	1%

US Census

Hispanic or Latino Population: The US Census defines race as a self-identification data item in which respondents choose the race or races with which they most closely identify. In 1997, the Federal Office of Management and Budget (OMB) revised the standards for how the Federal government would collect and present data on race and ethnicity. The new guidelines reflect “the increasing diversity of our Nation’s population, stemming from growth in interracial marriages and immigration.”

These new guidelines revised some of the racial categories used in 1990 and preceding censuses and allowed respondents to report as many race categories as were necessary to identify themselves on the Census 2000 questionnaire. As a result, Census 2000 race data are not directly comparable with data from 1990 and previous censuses. In particular, data concerning Spanish/Hispanic/Latino ancestries became a separate category to reflect separate racial classifications associated with these persons.

Table 2-8 includes the Hispanic or Latino population in the City of Beloit in 2000 by census tract. Hispanic or Latino populations comprise between 2 percent (tracts 22, 24, 25) and 16 percent (tract 18) of the total population within each tract. Approximately 9 percent of the total population within the City of Beloit is Hispanic or Latino.

Table 2-8: Hispanic or Latino Population by Race, 2000

	Census Tract 15	Census Tract 16	Census Tract 17	Census Tract 18	Census Tract 19	Census Tract 20	Census Tract 21	Census Tract 22	Census Tract 23	Census Tract 24	Census Tract 25	Census Tract 26.01	Census Tract 26.02
Total:	2,114	5,204	5,576	4,599	2,816	3,747	3,537	2,181	1,898	3,137	2,392	4,717	3,339
Not Hispanic or Latino:	1,926	4,488	4,902	3,844	2,549	3,616	3,439	2,145	1,802	3,081	2,351	4,574	3,076
White alone	1,451	3,627	3,843	1,645	2,099	3,410	3,165	1,986	1,422	2,943	2,012	3,917	2,820
Black or African American alone	305	656	864	1,988	351	136	189	106	326	77	287	487	149
American Indian and Alaska Native alone	11	41	19	4	8	8	7	5	2	9	5	15	4
Asian alone	81	16	21	74	20	13	34	10	9	23	26	73	55
Native Hawaiian and Other Pacific Islander alone	1	4	1	6	0	0	2	3	0	0	0	0	1
Some other race alone	7	17	7	17	0	8	1	1	4	0	0	10	7
Two or more races	70	127	147	110	71	41	41	34	39	29	21	72	40
Hispanic or Latino:	188	716	674	755	267	131	98	36	96	56	41	143	263
Percentage of Total:	9%	14%	12%	16%	9%	3%	3%	2%	5%	2%	2%	3%	8%
White alone	91	317	263	341	55	49	21	9	40	40	12	60	107
Black or African American alone	5	8	12	29	3	7	0	0	13	0	0	5	0
American Indian and Alaska Native alone	1	3	7	4	1	0	4	0	0	1	0	0	4
Asian alone	1	0	3	0	0	0	0	0	0	0	0	0	1
Native Hawaiian and Other Pacific Islander alone	0	2	4	0	0	0	0	0	0	0	0	0	0
Some other race alone	75	306	336	328	183	64	66	25	34	11	28	69	127
Two or more races	15	80	49	53	25	11	7	2	9	4	1	9	24

2000 Census, SF-1

Table 2-9 indicates approximate Hispanic or Latino population changes between 1990-2000. The table shows a similar proportion of origins between 1990-2000 but significant increases in the total population of each group. Overall, there was a 329 percent increase in total Hispanic or Latino populations within the census tracts that comprise the City of Beloit. There was also a 370 percent increase in the total Mexican population during this same period. It should be noted that changes in the Census 2000 category "Hispanic or Latino" from 1990 to 2000 may account for some discrepancies in total population.

Table 2-9: Change in Hispanic or Latino Population*, 1990-2000

	1990	% of Total	2000	% of Total	% Change 1990-2000
Hispanic or Latino:	807	100%	3464	100%	329%
Mexican	629	78%	2958	85%	370%
Puerto Rican	47	6%	83	2%	77%
Cuban	14	2%	21	1%	50%
Other Hispanic	117	14%	402	12%	244%

US Census, SF-1

*for Census 2000, "Hispanic or Latino" was categorized as separate from "Race"

Mobility: The City has a highly mobile population. Over 46 percent of residents lived in a different residence in 1995 according to the 2000 Census. Of these, over 31 percent lived somewhere in Rock County, and 11 percent moved to Beloit from another state.

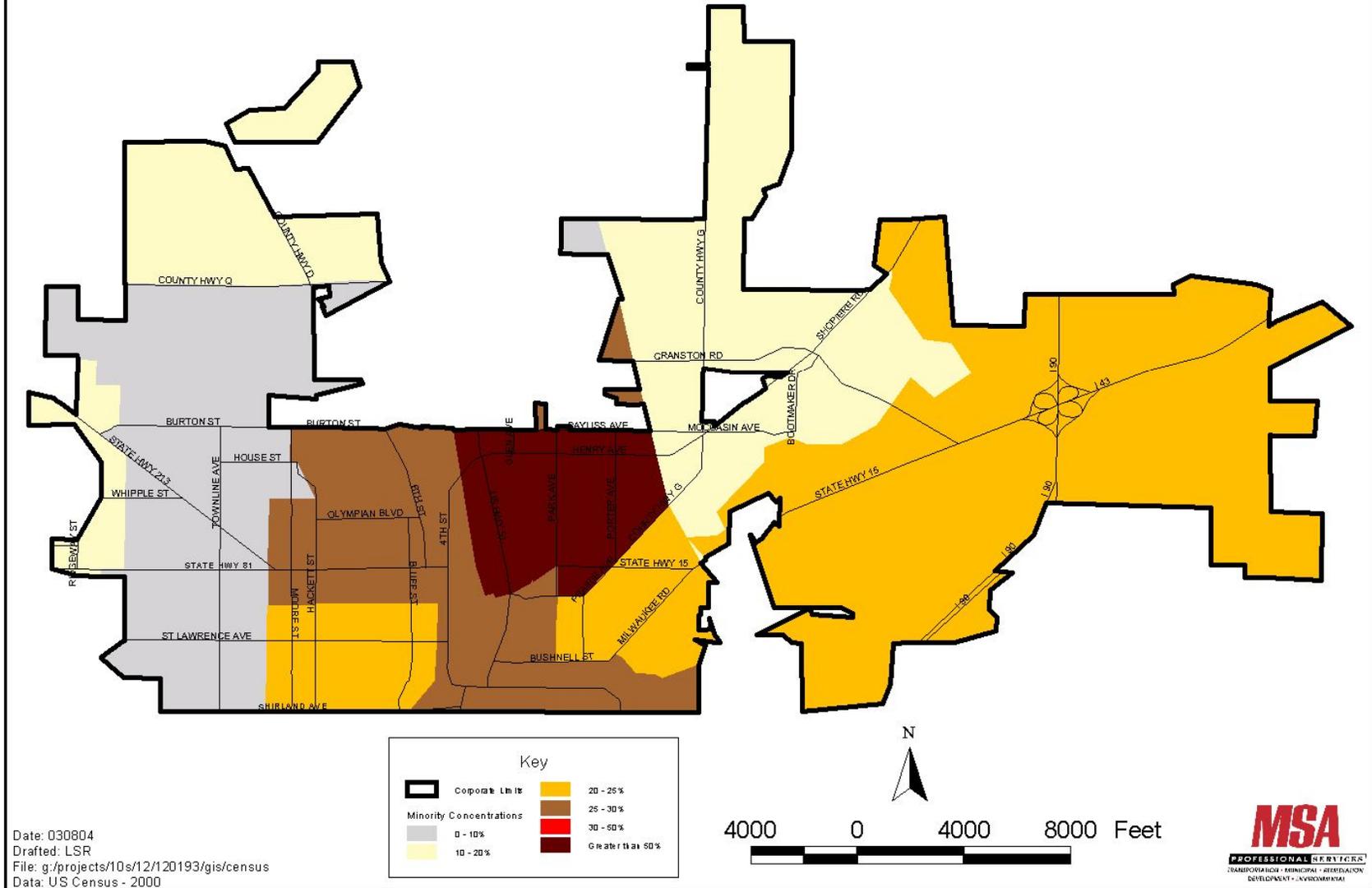
Areas of Minority Concentration: Minority concentrations are those census tracts in which the total percentage of minority households is higher than would be expected based upon average racial distributions, approximately 24 percent non-white. Table 2-10 indicates census tracts 15, 17, 18, and 23 as areas of minority concentration.

Table 2-10 Number of Non-White Persons by Census Tract, 1990-2000

Census Tract	Population		Non-White		Percent Non-White	
	1990	2000	1990	2000	1990	2000
15	541	2114	139	572	26%	27%
16	5323	5204	792	1260	15%	24%
17	5399	5531	1098	1464	20%	26%
18	5020	4599	2466	2613	49%	57%
19	4575	2759	779	661	17%	24%
20	3965	3735	141	288	4%	8%
21	3816	3097	228	294	6%	9%
22	120	643	0	127	0%	20%
23	49	29	16	8	33%	28%
24	5	3	0	0	0%	0%
25	2581	2392	288	368	11%	15%
26.01	2602	3925	331	695	13%	18%
26.02	1577	1744	191	391	12%	22%

US Census, SF-1

City of Beloit
 Rock County, Wisconsin
 Areas of Minority Concentrations by Tract



Date: 030804
 Drafted: LSR
 File: g:/projects/10s/12/120193/gis/census
 Data: US Census - 2000

Map 7: Minority Concentrations by Tract

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Age: The median age for the population of Beloit was comparatively low at 32.7 years in 2000. This compares to 35.9 years for Rock County and 36.0 years for the State of Wisconsin. As shown in Table 2-11, the number of people under 5 years old (-12%) and those between 60 and 74 years (-29%) decreased substantially in the City of Beloit between 1990 and 2000. Those aged 45 to 54 increased by 36 percent (1,112), and persons over 85 years increased by 33 percent (169) between the decades.

Table 2-11 Change in Population by Age, 1990-2000

Age Group	1990	1990 Percent	2000	2000 Percent	1990-2000 Percentage Change	1990-2000 Numeric Change
Under 5	3103	9%	2746	8%	-12%	-357
5 to 9	2957	8%	2919	8%	-1%	-38
10 to 14	2644	7%	2704	8%	2%	60
15 to 19	2690	8%	2833	8%	5%	143
20 to 24	2891	8%	2806	8%	-3%	-85
25 to 34	5835	16%	5038	14%	-14%	-797
35 to 44	4652	13%	5174	14%	11%	522
45 to 54	3128	9%	4240	12%	36%	1112
55 to 59	1466	4%	1453	4%	-1%	-13
60 to 64	1441	4%	1229	3%	-15%	-212
65 to 74	2616	7%	2256	6%	-14%	-360
75 to 84	1645	5%	1703	5%	4%	58
85 years and over	505	1%	674	2%	33%	169
Total:	35573		35775			

US Census

Persons with Disabilities: The Census defines a disability as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. In 2000, 6,974 persons, 19.5% of the population of the City of Beloit, reported having a census-defined disability. By age group, this includes 917 people ages 5-20, 4,202 people ages 21-64, and 1,855

What is a “Householder”?

According to the U.S. Census Bureau, a “Householder” is the “person, or one of the people, in whose name the home is owned, being bought, or rented. If there is no such person present, any household member 15 years old and over can serve as the householder for the purposes of the census.”

“Two types of householders are distinguished: a family householder and a nonfamily householder. A family householder is a householder living with one or more people related to him or her by birth, marriage, or adoption. The householder and all people in the household related to him are family members. A nonfamily householder is a householder living alone or with nonrelatives only.”

people over the age of 65 with a disability. For those aged 65 and over, this accounts for 42 percent of the population.

Household Size and Composition: Average household size for Beloit was 2.57 people in 2000. This is comparable to Rock County (2.54) and the State of Wisconsin (2.50). Average family size in Beloit was recorded at 3.1 people. “Family” differs from “household” in that at least two members in a family are related. There were 37.9 percent of households with individuals under 18 years old. Households containing individuals 65 years and older accounted for 24.1 percent of total households.

Income Characteristics: In 1999, median family income (MFI) for Beloit was \$42,083. This compares lower than Rock County at \$53,380, and the State at \$52,911. There were 425 households (3%) with public assistance income in 1999. During this same period, there were 2,373 white individuals (9% of all whites) and 1,215 black individuals (23% of all blacks) with income below the poverty level. Median household income was \$37,388 for white households and \$28,434 for black households (representing only 76% of the median income for a white household).

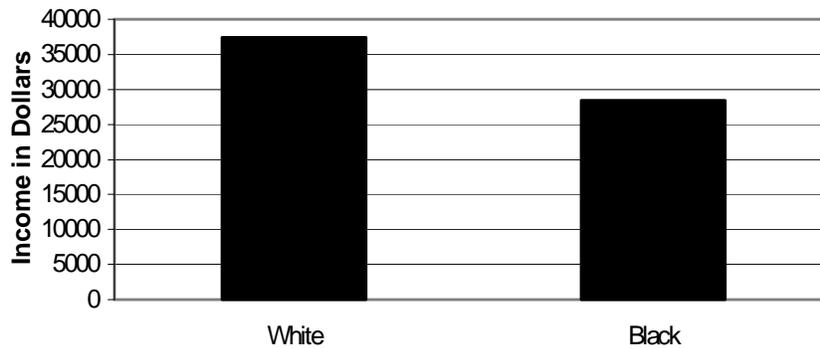


Figure 2-3: Median Income by Race

Low-income Concentrations: The U.S. Department of Housing and Urban Development has created new “Special Income Limit” estimates based on Census 2000 data. Prior income limits (1999) were based on extrapolations from 1990 Census data. The new calculation is based on income limits derived from median income for a four-person household according to regional Census data. The limits for Beloit are based on Janesville MSA (Rock County) limits of \$43,050 for “moderate” income household (80% of median income; \$26,900 for a “low” income household (50% of median income); and \$16,150 for a “very low” income household (30% of median income). Income limits are adjusted based on average household sizes. The limits are raised by 8% for each person above four and reduced by 10% for each person less than four. For example, the 3-person limit is 90% of the 4-person limit and the 6-person limit is 116% of the 4-person unit.

The results of these calculations are estimates of family and non-family households that are living in “very low”, “low”, and “moderate” income households. The figures for the City of Beloit appear in Table 2-12 (below) and are depicted in the maps that follow. It is important to note that these figures are cumulative. For example, the “low” income households (those

earning 50% or less of the adjusted median income) includes the “very low” income households (those earning 30% or less of the adjusted median income); while the “moderate” income households (those earning 80% or less of the adjusted median income) includes all those classified as “very low” and “low” income households.

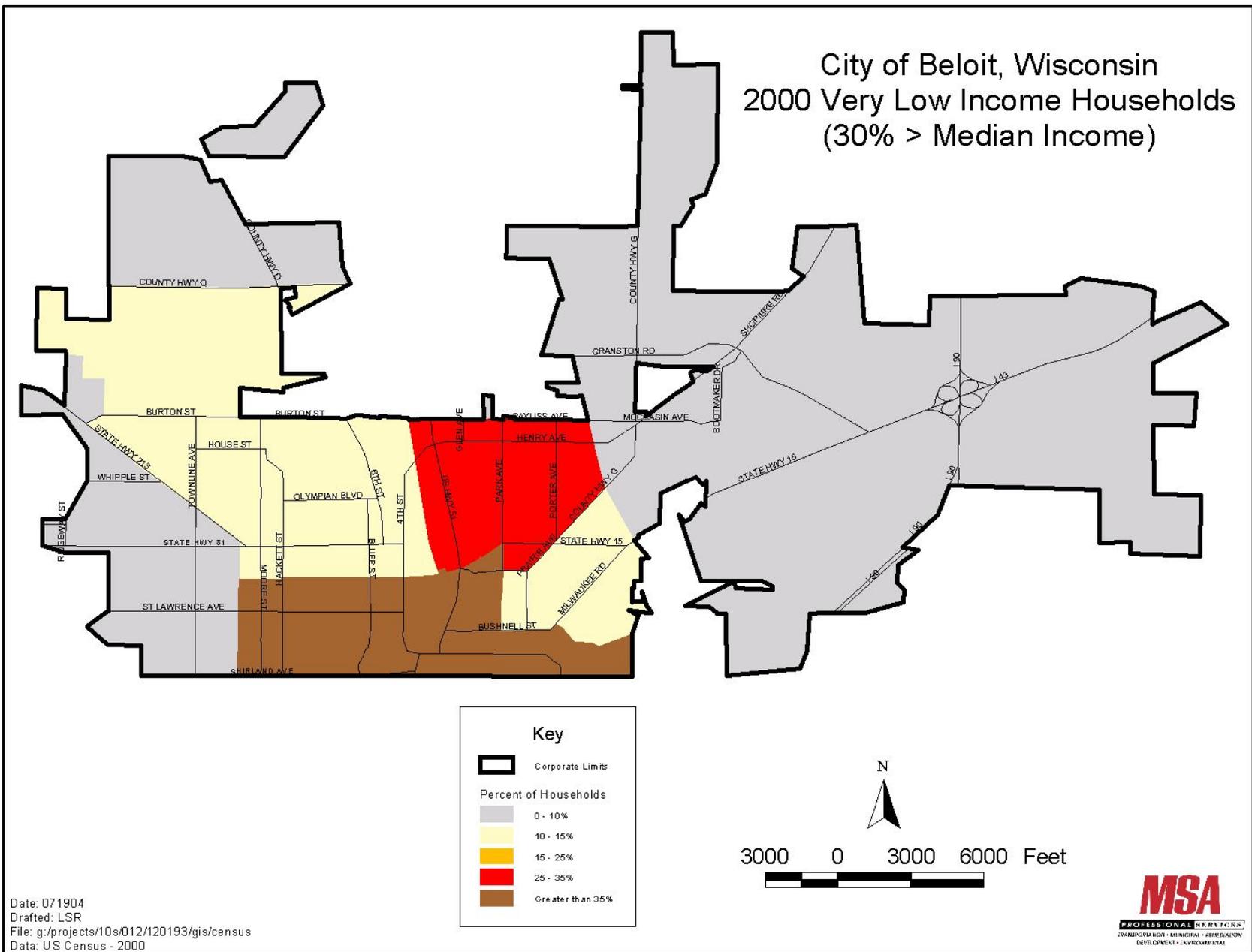
Five block groups in the City have the distinction of having over half of their households classified as “low income” (see shaded lines in Table 2-12). Nearly half of the block groups in the City (18/38) have over fifty percent of their households earning “moderate” incomes. In fact, 45% of all households in the City of Beloit fall into the “moderate” income category.

A visual comparison of Maps 8, 9, and 10 with the maps depicting rental housing (Map 1 – Renters by Block) and minority concentrations (Map 7 – Minority concentrations by Tract) would seem to reinforce that notion of a strong correlation between poverty, race, and home tenure/ownership.

Table 2-12: Low-Income Concentrations

Census Tract	Block Group	Total Households	Very-Low Income		Low Income		Moderate Income	
			30% CMI	Percentage at or Below 30% CMI	50% CMI	Percentage at or Below 50% CMI	80% CMI	Percentage at or Below 80% CMI
15	1	633	294	46.4%	363	57.3%	461	72.8%
15	2	48	37	77.1%	45	93.8%	48	100%
16	1	373	107	28.7%	144	38.6%	221	59.2%
16	2	511	56	11.0%	148	29.0%	282	55.2%
16	3	556	221	39.7%	323	58.1%	469	84.4%
16	4	506	67	13.2%	191	37.7%	342	67.6%
17	1	1104	267	24.2%	467	42.3%	752	68.1%
17	2	483	55	11.4%	119	24.6%	255	52.8%
17	3	417	25	6.0%	60	14.4%	211	50.6%
18	1	337	103	30.6%	189	56.1%	268	79.5%
18	2	452	118	26.1%	259	57.3%	370	81.9%
18	3	477	102	21.4%	196	41.1%	332	69.6%
18	4	322	49	15.2%	103	32.0%	194	60.2%
19	1	742	89	12.0%	210	28.3%	374	50.4%
19	2	307	49	16.0%	94	30.6%	152	49.5%
20	1	191	42	22.0%	77	40.3%	121	63.4%
20	2	469	62	13.2%	179	38.2%	286	61.0%
20	3	681	69	10.1%	183	26.9%	368	54.0%
20	4	174	22	12.6%	47	27.0%	81	46.6%
21	1	364	43	11.8%	105	28.8%	162	44.5%
21	2	418	46	11.0%	129	30.9%	224	53.6%
21	3	432	48	11.1%	107	24.8%	182	42.1%
21	4	179	3	1.7%	3	1.7%	6	3.4%
22	1	495	62	12.5%	122	24.6%	163	32.9%
22	2	307	0	0%	0	0%	0	0%
23	1	249	0	0%	0	0%	0	0%
23	2	303	0	0%	0	0%	12	4%
23	3	254	0	0%	0	0%	0	0%
24	1	487	0	0%	0	0%	0	0%
24	2	490	0	0%	0	0%	0	0%
25	1	660	60	9.1%	144	21.8%	293	44.4%
25	2	302	13	4.3%	43	14.2%	120	39.7%
26.01	1	445	29	6.5%	78	17.5%	148	33.3%
26.01	2	523	42	8.0%	54	10.3%	156	29.8%
26.01	3	911	81	8.9%	190	20.9%	337	37.0%
26.02	1	672	21	3.1%	53	7.9%	74	11.0%
26.02	2	197	0	0%	0	0%	8	4.1%
26.02	3	428	33	7.7%	61	14.3%	128	29.9%
Total		16,899	2,315	13.7%	4,486	26.5%	7,600	45.0%

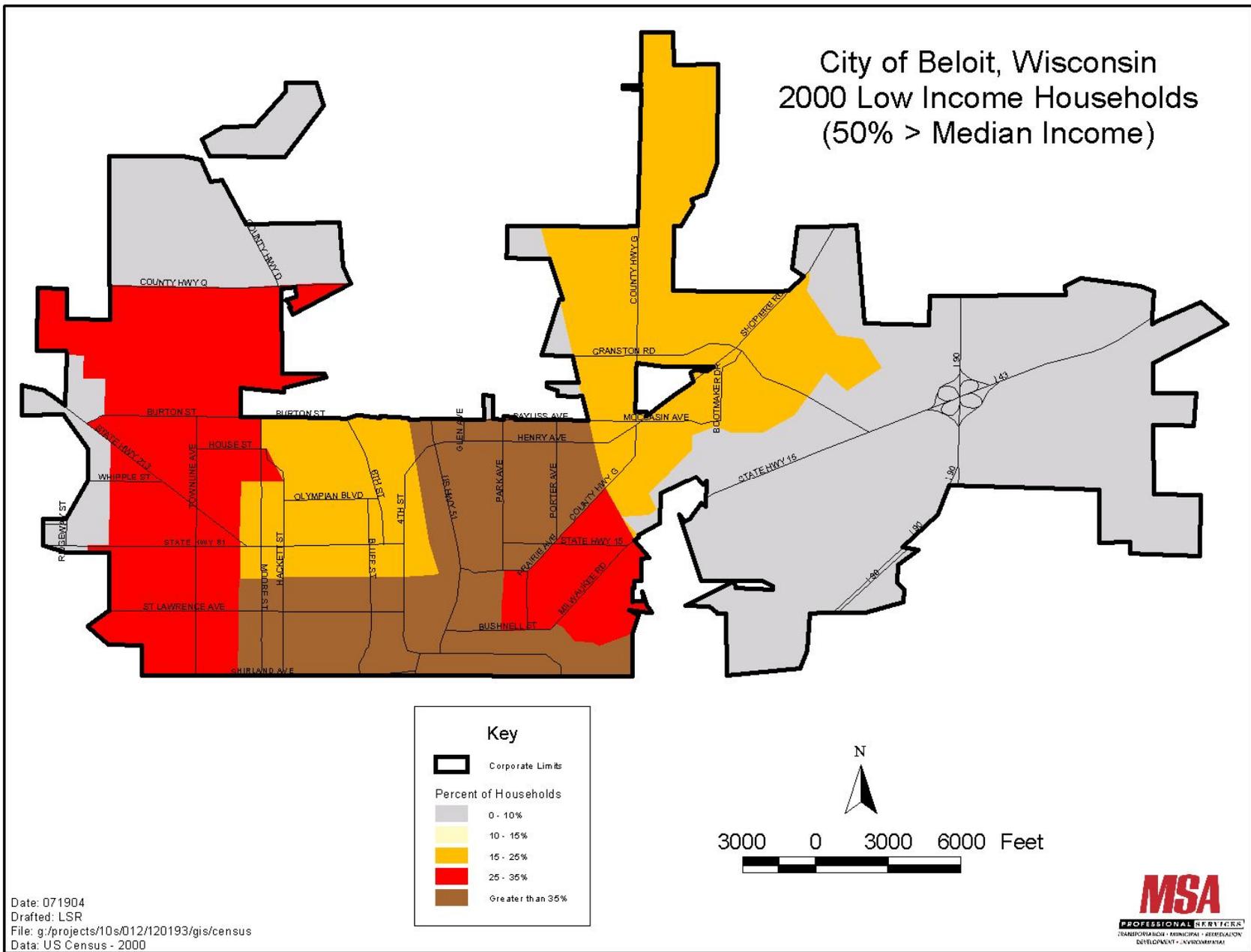
2000 Census, 2000 Section 8 CMI Limits



Map 8: Very Low Income Households

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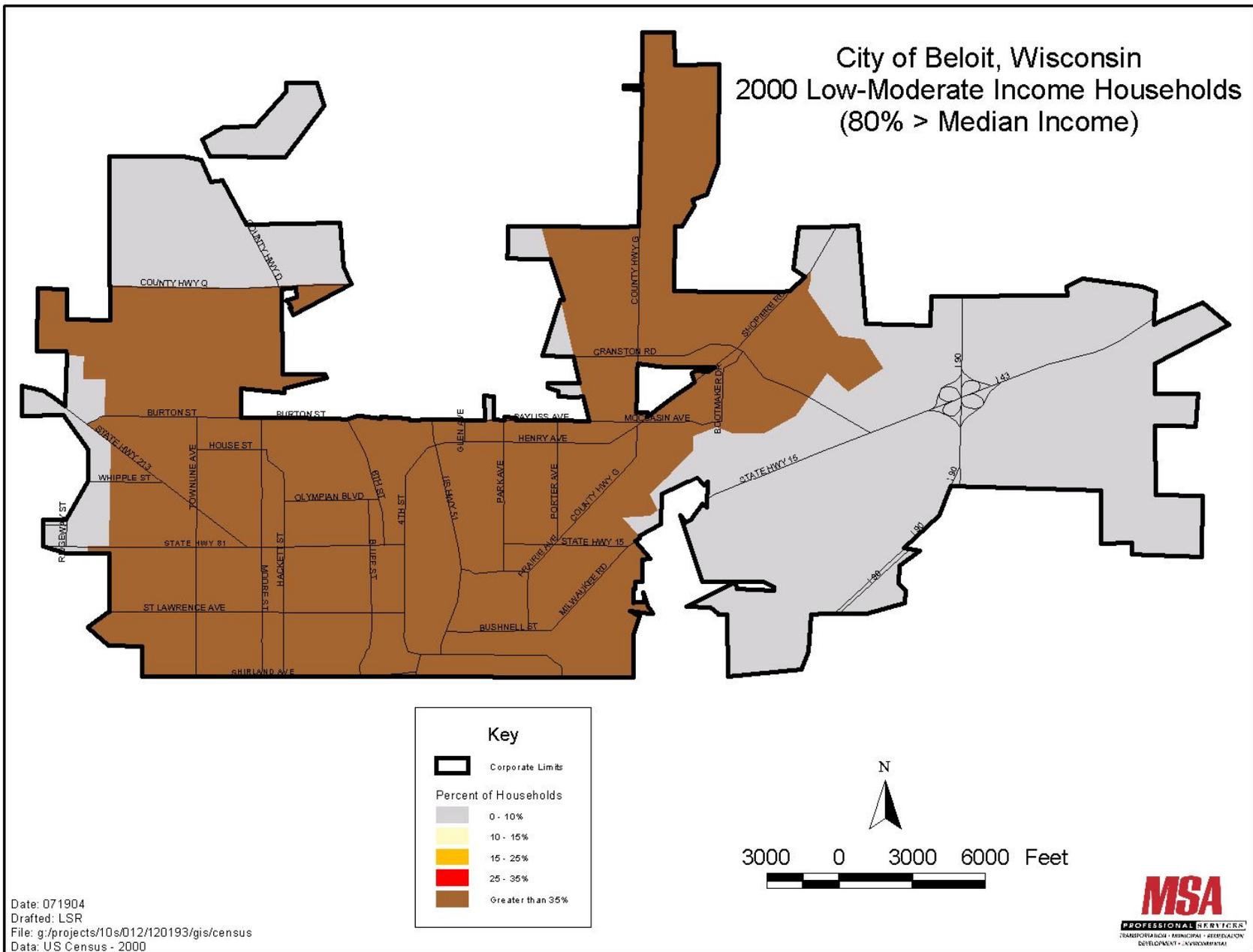
ANALYSIS of IMPEDIMENTS to FAIR HOUSING
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Map 9: Low Income Households

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ANALYSIS of IMPEDIMENTS to FAIR HOUSING
 BELOIT, WISCONSIN
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Map 10: Moderate Income Households

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ANALYSIS of IMPEDIMENTS to FAIR HOUSING
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Familial Status: The income that a household may have available for housing also appears to have a relationship to familial status. As Table 2-13 indicates, householders who are unmarried and have children are more frequently represented in low and very-low income categories. Female householders with children are most represented in the very-low income category with 33 percent (357).

Table 2-13: Income Levels by Familial Status by Income Classification*

Familial Status	Total	Very Low #	Very Low %	Low #	Low %	Moderate #	Moderate %
Female HH no Children, no Husband	599	120	20%	69	12%	200	33%
Female HH w/ Children	1390	455	33%	357	26%	399	29%
Male HH no Children, no Wife	255	19	7%	31	12%	37	15%
Male HH w/ Children	403	75	19%	80	20%	160	40%
Married Couple no Children	3523	176	5%	314	9%	751	21%
Married Couple w/ Children	2793	81	3%	254	9%	561	20%

*Very-Low Income = <\$14,999; Low Income = \$15,000 to \$24,999; Moderate Income = \$25,000 to \$39,999

US Census PCT38, SF-3

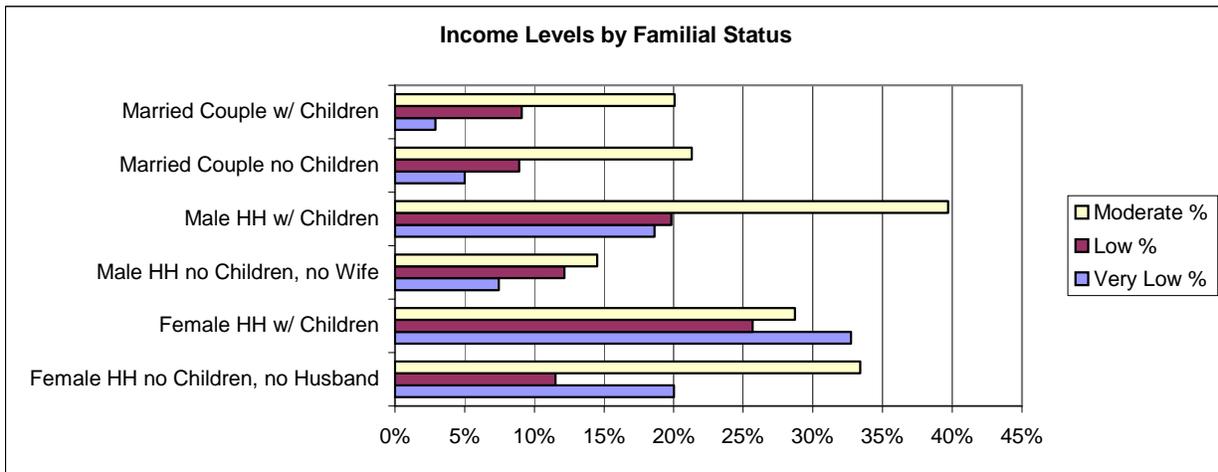
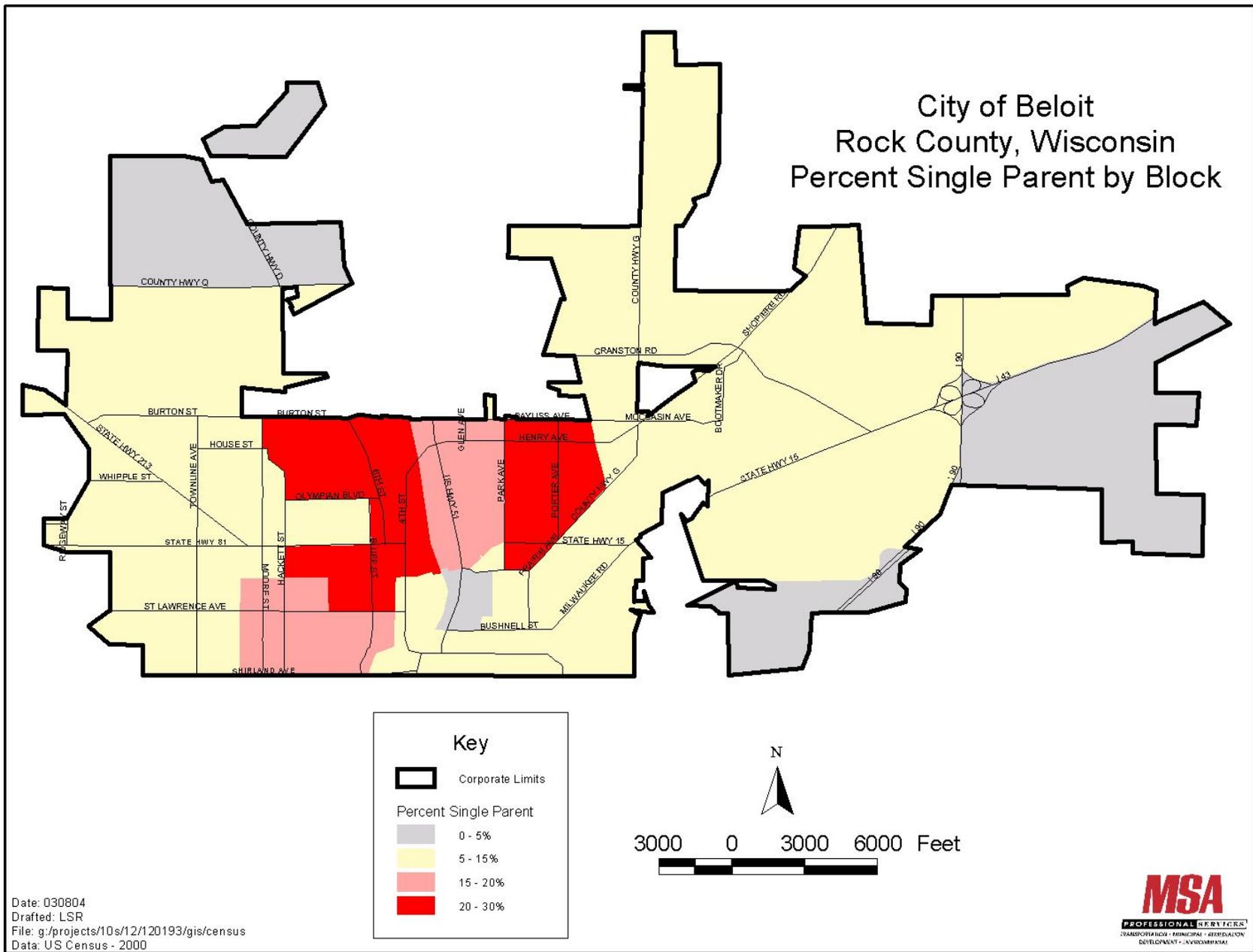


Figure 2-4: Income Levels by Familial Status



Map 11: Percent Single Parent by Block

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ANALYSIS of IMPEDIMENTS to FAIR HOUSING
BELOIT, WISCONSIN
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Employment and Transportation Profile

Employers and Industry

In 1990, Beloit had 15,920 employed residents. In 2000, this number dropped very slightly to 15,840 (-0.5 %). Manufacturing occupations employ most Beloit residents at 34.9 percent, and 64 percent of these are male residents. Educational, health and social services is the second leading occupation and is dominated by females by almost a 4 to 1 margin. Retail trade occupations employ 11.1 percent of the workforce over the age of 16. See Table 2-14.

Table 2-14: Employment by Industry 2000

Occupation	Male Number	Female Number	Number Total	Percent Total
Agricultural, forestry, fishing and hunting, and mining	58	16	74	0.5
Construction	720	57	777	4.9
Manufacturing	3554	1968	5522	34.9
Wholesale trade	216	103	319	2.0
Retail trade	700	1060	1760	11.1
Transportation and warehousing, and utilities	391	151	542	3.4
Information	76	161	237	1.5
Finance, insurance, real estate, and rental and leasing	210	319	529	3.3
Professional, scientific, management, administrative, and waste management services	430	396	826	5.2
Educational, health and social services	614	2300	2914	18.4
Arts, entertainment, recreation, accommodation and food services	589	759	1348	8.5
Other services	300	319	619	3.9
Public administration	172	201	373	2.4
Totals	8030	7810	15840	100

US Census

Table 2-15 lists the top 20 major employers in the City of Beloit by number of employees. Beloit Memorial Hospital employs the most workers with 1,007 employees. Beloit School District is the second leading employer with 904 employees; Frito-Lay is third with 750 workers. These top 20 employers provide jobs to 8,820 workers (56% of local employment).

Table 2-15: Top 20 Employers in City of Beloit 2003

Employer	Product or Service	# of Employees
Beloit Memorial Hospital	Medical Services	1007
School District of Beloit	Public Education Grades K-12	904
Frito-Lay	Snack Foods	750
General Motors	Auto Assembly	525
Taylor Company	Ice Cream & Shake Machines	520
Beloit College	4-year Liberal Arts College	450
Beloit Clinic	Medical Services	420
Regal-Beloit Corporation	Cutting tools/Power transmission equip.	418

Table 2-15: Top 20 Employers in City of Beloit 2003

Employer	Product or Service	# of Employees
Kerry Ingredients	Dehydrated Food Products	415
City of Beloit	Municipal Services	411
Alcoa International	Aluminum Wheels	400
Woodward Governor	Aftermarket-Aerospace Products	400
Ecolab, Inc.	Chemical Dispensers/Cleaning Sys.	352
Wal-Mart Super Store	Retail Department Store	350
Fairbanks Morse/Goodrich	Diesel Engines & Accessories	293
Hormel Foods	Canned Meat Products	275
Turner School District	Public Education Grades K-12	250
Consolidated Biscuit Co.	Snack Foods and Bakery Goods	240
Warner Electric	Brake & Clutch Systems, Cutting tools	230
Alliant Energy	Water, Gas & Electric Utilities	210

City of Beloit, Economic Development Office

Labor Force: Table 2-16 below illustrates a slight growth in employment between 1992 and 2002 with an additional 331 workers reported. During this same time, the percentage of workers within the labor force who were unemployed decreased by 3.6 percent to a November 2002 rate of 8.2 percent. 1992 had the highest unemployment with 11.8 percent, 1995 was the lowest with only 4.6 percent.

Table 2-16: Labor Force and Unemployment 1992-2002 City of Beloit

Year	Labor Force	Employment	Unemployment	% Unemployment Beloit	% Unemployment Wisconsin
1992	18,326	16,166	2,160	11.8	6.7
1993	17,827	16,423	1,404	7.9	7
1994	17,883	16,757	1,126	6.3	6.4
1995	18,357	17,513	844	4.6	4.8
1996	18,495	17,578	917	5	4.5
1997	17,870	16,813	1,057	5.9	4.8
1998	17,706	16,725	981	5.5	4.3
1999	17,350	16,230	1120	6.5	3.9
2000	17,424	16,410	1,014	5.8	4.8
2001	17,712	16,001	1,701	9.6	5.4
Nov-02	17,975	16,497	1,478	8.2	5.9

City of Beloit Department of Economic Development, Wisconsin DWD

Wage Rates: Table 2-17 shows a comparison of mean wages between the Janesville-Beloit area and the State of Wisconsin. The data show that the mean annual wage for workers in the Janesville-Beloit Area is similar to the State overall, \$31,970 compared to \$32,160 respectively. The Janesville-Beloit Area pays workers proportionately higher in several occupations including Life, Physical, and Social Science (+\$7,130 annually), Production (+\$7,730 annually), and Community and Social Services (+\$4,810 annually). The Janesville-Beloit Area pays workers proportionately less in all other areas. Significant differences

include Computer and Mathematical (-\$6,020 annually), Legal (-\$5,870 annually), and Farming, Fishing, and Forestry (-\$5,370 annually).

Table 2-17: Mean Wage Comparison by SOC, 2001

Standard Occupational Classification	Janesville-Beloit Area			State of Wisconsin			
	Total Employment	Mean Annual Wage	Mean Hourly Wage	Mean Annual Wage	Difference Beloit/State Annual	Mean Hourly Wage	Difference Beloit/State Hourly
Industry Total	65,440	\$31,970	\$15.37	\$32,160	\$ (190.00)	\$15.46	\$ (0.09)
Management Occupations	2,950	\$59,750	\$28.72	\$63,860	\$ (4,110.00)	\$30.70	\$ (1.98)
Business and Financial Operations Occupations	1,360	\$43,010	\$20.68	\$44,900	\$ (1,890.00)	\$21.59	\$ (0.91)
Computer and Mathematical Occupations	510	\$49,570	\$23.83	\$55,590	\$ (6,020.00)	\$26.73	\$ (2.90)
Architecture and Engineering Occupations	890	\$49,890	\$23.98	\$50,320	\$ (430.00)	\$24.19	\$ (0.21)
Life, Physical, and Social Science Occupations	300	\$50,690	\$24.37	\$43,560	\$ 7,130.00	\$20.94	\$ 3.43
Community and Social Services Occupations	600	\$39,250	\$18.87	\$34,440	\$ 4,810.00	\$16.56	\$ 2.31
Legal Occupations	170	\$59,110	\$28.42	\$64,980	\$ (5,870.00)	\$31.24	\$ (2.82)
Education, Training, and Library Occupations	3,590	\$35,000	\$16.83	\$37,760	\$ (2,760.00)	\$18.15	\$ (1.32)
Arts, Design, Entertainment, Sports, and Media Occupations	560	\$29,430	\$14.15	\$34,300	\$ (4,870.00)	\$16.49	\$ (2.34)
Healthcare Practitioners and Technical Occupations	3,030	\$47,610	\$22.89	\$48,250	\$ (640.00)	\$23.20	\$ (0.31)
Healthcare Support Occupations	1,770	\$21,280	\$10.23	\$21,940	\$ (660.00)	\$10.55	\$ (0.32)
Protective Service Occupations	1,340	\$28,280	\$13.60	\$33,100	\$ (4,820.00)	\$15.91	\$ (2.31)
Food Preparation and Serving Related Occupations	5,450	\$15,870	\$7.63	\$16,490	\$ (620.00)	\$7.93	\$ (0.30)
Building and Grounds Cleaning and Maintenance Occupations	2,030	\$19,890	\$9.56	\$20,460	\$ (570.00)	\$9.84	\$ (0.28)
Personal Care and Service Occupations	1,410	\$18,060	\$8.68	\$19,870	\$ (1,810.00)	\$9.55	\$ (0.87)
Sales and Related Occupations	6,450	\$25,800	\$12.40	\$28,050	\$ (2,250.00)	\$13.49	\$ (1.09)
Office and Administrative Support Occupations	9,530	\$25,340	\$12.18	\$26,110	\$ (770.00)	\$12.55	\$ (0.37)
Farming, Fishing, and Forestry Occupations	**	\$19,150	\$9.21	\$24,520	\$ (5,370.00)	\$11.79	\$ (2.58)
Construction and Extraction Occupations	2,690	\$41,400	\$19.91	\$38,850	\$ 2,550.00	\$18.68	\$ 1.23
Installation, Maintenance, and Repair Occupations	2,690	\$36,760	\$17.67	\$35,270	\$ 1,490.00	\$16.96	\$ 0.71
Production Occupations	11,650	\$37,030	\$17.81	\$29,300	\$ 7,730.00	\$14.09	\$ 3.72
Transportation and Material Moving Occupations	6,390	\$27,210	\$13.08	\$26,700	\$ 510.00	\$12.84	\$ 0.24

2001 Occupational Employment Statistics Survey, Wisconsin DWD

Transportation/Travel Time to Work: The most utilized source of transportation in Beloit is the private automobile. 78.6 percent of all workers aged 16 or older drove alone to work, while 13.7 percent reported carpooling. Walking was the second most common form of travel after private automobiles with 5 percent. Public transportation (including taxicabs) was the primary mode for 1.1 percent. The mean travel time to work for all commuters was 20.0 minutes. This compares approximately the same with Rock County at 20.3 minutes, and the State of Wisconsin at 20.8 minutes.

According to Journey to Work data from the 2000 Census, of the 15,547 residents who live in Beloit and journey to work, almost 44 percent (6827) work inside the City limits. The remaining 8,720 workers journey outside the City for employment. The two primary areas residents are commuting to are Winnebago County, Illinois, which is immediately south of the City limits, and the City of Janesville to the north. Winnebago County accounts for 2,867 workers (18.4%), and the City of Janesville 2,675 workers (17.2%). See Table 2-18 below.

Table 2-18: Beloit Residents Who May Work Elsewhere, 2000*

Workplace	# Workers	% of Total
Beloit city Rock Co. WI	6827	43.9%
Winnebago Co. IL	2867	18.4
Janesville city Rock Co. WI	2675	17.2
Beloit town Rock Co. WI	687	4.4
McHenry Co. IL	218	1.4
Clinton village Rock Co. WI	198	1.2
Boone Co. IL	136	0.9
Janesville town Rock Co. WI	121	0.8
Delavan city Walworth Co. WI	114	0.7
Darien village Walworth Co. WI	105	0.7
Evansville city Rock Co. WI	100	0.6
Edgerton city Rock Co. WI	90	0.6
Rock town Rock Co. WI	86	0.6
Stoughton city Dane Co. WI	77	0.5
Turtle town Rock Co. WI	75	0.5
Elkhorn city Walworth Co. WI	74	0.5
Milton city Rock Co. WI	72	0.5
Fort Atkinson city Jefferson Co. WI	67	0.4
Madison city Dane Co. WI	65	0.4
Walworth village Walworth Co. WI	55	0.4

Census 2000 Journey to Work Statistics

**more than 50 workers*

Table 2-19 below indicates there are 7,323 workers (49.7%) that reside outside the City and work in the City of Beloit. Most of these workers reside in nearby Winnebago County, IL (13.5%), the Town of Beloit (9.6%), or the City of Janesville (9.6%).

Table 2-19: Beloit Workers Who May Reside Elsewhere, 2000*

Workplace	# Workers	% of Total
Beloit city Rock Co. WI	6827	48.3%
Winnebago Co. IL	1911	13.5
Beloit town Rock Co. WI	1358	6.9
Janesville city Rock Co. WI	1358	9.6
Turtle town Rock Co. WI	384	2.7
Rock town Rock Co. WI	338	2.4
Newark town Rock Co. WI	261	1.8
Clinton village Rock Co. WI	167	1.2
Plymouth town Rock Co. WI	107	0.8
Madison city Dane Co. WI	78	0.6
Orfordville village Rock Co. WI	78	0.6
Clinton town Rock Co. WI	75	0.5

Census 2000 Journey to Work Statistics

**more than 50 workers*

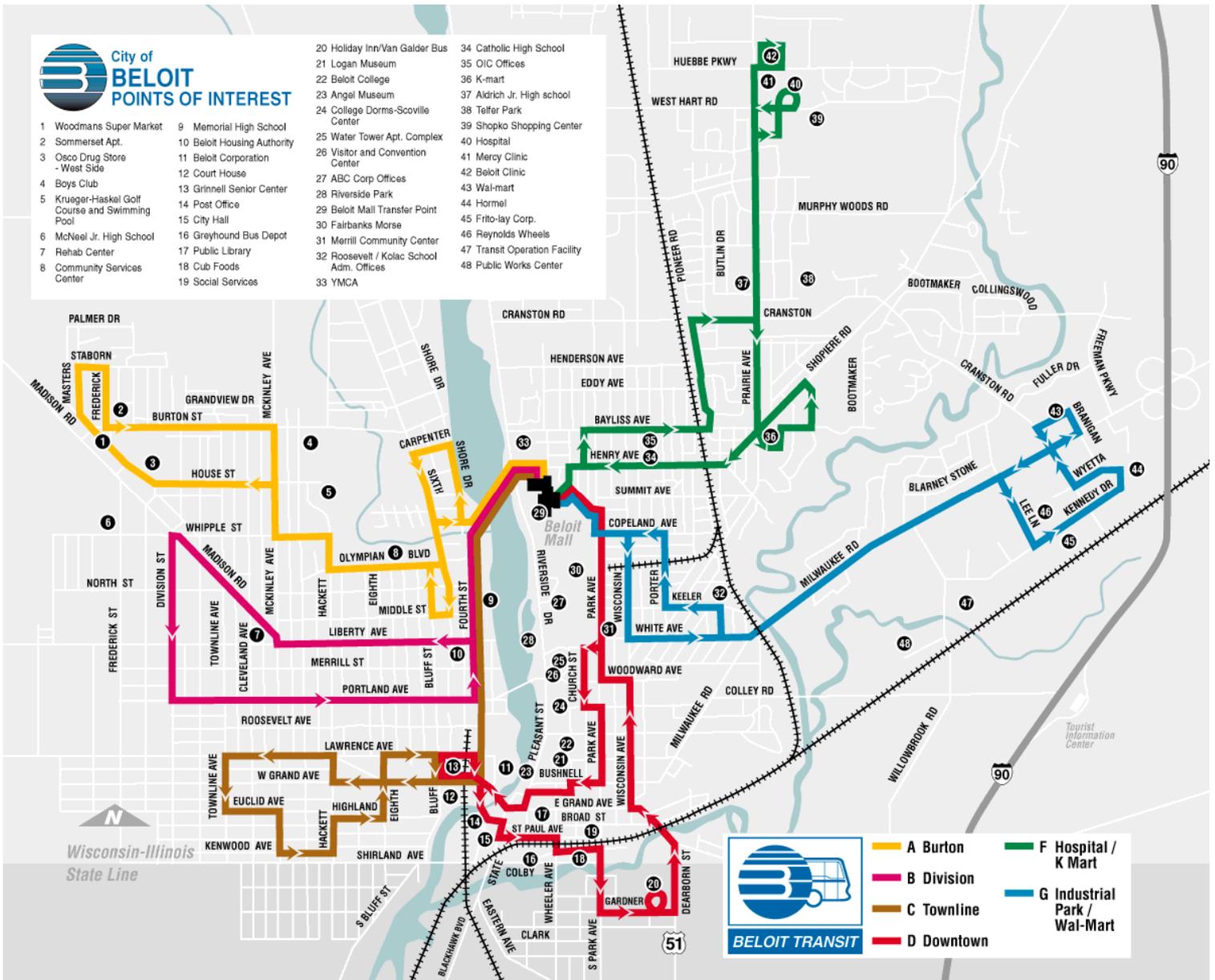
Transit System: The Beloit Transit System (BTS) is comprised of six City routes and one extended route to Janesville. The BTS routes reach multiple shopping and service destinations as well as UW-Rock County, Blackhawk Technical College, and Rock County Job Center via the extended Beloit-Janesville Express. The BTS operates Monday through Friday 6 A.M. to 5:30 P.M. and on Saturdays from 9 A.M. to 4 P.M. All City routes are \$1.00, or \$0.50 for senior citizens, disabled persons or Medicare recipients. All routes originate at the Beloit Mall.

For disabled persons who require paratransit services, Rock County Specialized Transit is available 8 A.M. to 5 P.M. Monday through Friday. Additional service hours are available through CARE-A-VAN Monday through Friday, and from 9 A.M. to 4:30 P.M. on Saturdays. The basic cash fare is \$2.00.

Routes and destinations for the Beloit Transit system appear to be adequate for reaching the places residents would need to reach for daily activities (work, shopping, etc.). The rate of fares also appears to be a non-limiting factor for residents reliant upon transit to reach their destinations. The greatest limiting factor in the current system appears to be the hours of operation. For occupations that utilize non-traditional work hours (i.e. not 9 A.M. to 5 P.M.), such as many service occupations or shift workers, the operating hours limit transit utilization as a mode choice for traveling to work. In addition, the relatively early closing time severely limits “trip-chaining” practices (i.e., the ability to combine multiple trip purposes, such as grocery shopping or retrieving children from daycare, into a single chain of trips).

City of BELOIT POINTS OF INTEREST

- 1 Woodmans Super Market
- 2 Sommerset Apt.
- 3 Oscor Drug Store - West Side
- 4 Boys Club
- 5 Krueger-Haskel Golf Course and Swimming Pool
- 6 McNeel Jr. High School
- 7 Rehab Center
- 8 Community Services Center
- 9 Memorial High School
- 10 Beloit Housing Authority
- 11 Beloit Corporation
- 12 Court House
- 13 Grinnell Senior Center
- 14 Post Office
- 15 City Hall
- 16 Greyhound Bus Depot
- 17 Public Library
- 18 Cub Foods
- 19 Social Services
- 20 Holiday Inn/Van Galder Bus
- 21 Logan Museum
- 22 Beloit College
- 23 Angel Museum
- 24 College Dorms-Scoville Center
- 25 Water Tower Apt. Complex
- 26 Visitor and Convention Center
- 27 ABC Corp Offices
- 28 Riverside Park
- 29 Beloit Mall Transfer Point
- 30 Fairbanks Morse
- 31 Merrill Community Center
- 32 Roosevelt / Kolac School Adm. Offices
- 33 YMCA
- 34 Catholic High School
- 35 OIC Offices
- 36 K-mart
- 37 Aldrich Jr. High school
- 38 Telfer Park
- 39 Shopko Shopping Center
- 40 Hospital
- 41 Mercy Clinic
- 42 Beloit Clinic
- 43 Wal-mart
- 44 Hormel
- 45 Frito-lay Corp.
- 46 Reynolds Wheels
- 47 Transit Operation Facility
- 48 Public Works Center



III. Evaluation of Fair Housing Profile

Fair Housing Programs and Activities

City Policies and Procedures

EOHRC - Equal Opportunities and Human Relations Commission

Chapter 1.82 of the City's municipal code establishes the Beloit Equal Opportunities and Human Relations Commission (EOHRC). The EOHRC is administratively supported by the City's Department of Human Resources. The purpose of the EOHRC is to improve the quality of life by the elimination of racism in the Beloit community, to take action, study, analyze and recommend solutions with respect to the major social, economic and cultural problems that affect people residing or working within the City of Beloit, including discrimination in housing, education, employment and public accommodations and facilities on the basis of sex, race, color, sexual orientation, national origin, or marital status of the person maintaining a household, lawful source of income, age or ancestry and the inciting of class, race or religious hatred and prejudice.

The Equal Opportunities and Human Relations Commission shall perform the following duties and exercise the following powers:

- Administer the Fair Housing Code found in Chapter 20 of the Code of General Ordinances of the City of Beloit and perform the duties and exercise the powers set forth in section 20.02 of that chapter.
- Facilitate compliance with federal, state and local laws relating to equal opportunities in education, employment, housing and recreation through informational programs and resolution of complaints through mediation and conciliation by the commission or representatives designated by the commission.
- Examine all aspects of relations between races and ethnic groups fairly and objectively, and foster awareness, understanding and appreciation of racial and ethnic diversity in the community.
- Identify problems of racism in the community and recommend solutions and positive courses of action to the general community, the City Council and City Manager.
- Recommend to the City Council and the City Manager the enactment of such ordinance or other action, including assignment of staff, as it deems necessary to insure all City residents have the right to equal opportunity in housing, employment, public accommodations and education.
- Initiate such public programs and studies and promote such privately sponsored programs and studies as will aid in accomplishing the commission's purposes and duties. Provide forums for dialogue on racism to improve relations.
- Conduct public hearings in accordance with the ordinances of the City and the commission's rules of procedure.
- Utilize the report of the Committee on Housing, Employment and Public Accommodations dated November 6, 1995 as a guide in the conduct of its affairs.
- Accept gifts or bequests, public and private, to help finance its activities.

- Be the official agency of the City to accept assistance under Title II of the Federal Economic Opportunity Act of 1964 approved by the City Council.
- Be the official agency of the City to accept assistance from the Community Relations Service of the U.S. Department of Justice under Title X of the Federal Civil Rights Act of 1964, for resolution of disputes, disagreements or difficulties relating to discriminatory practices which may impair the rights of persons in the City to equal opportunities in education, employment, housing and recreation. No such assistance shall be accepted without the approval of the City Council.

The EOHRC has taken on these duties with vigor. Three specific activities stand out. First, the EOHRC has championed a project called “The Campaign to Promote Racial Justice”. This program has included a number of community forums, a newsletter, and the application of a community-wide study circle model. While these activities depend largely on the efforts of volunteers and student interns, this has helped to stretch limited funding farther while providing participants with a real stake in the process. The down-side of using interns as staff has been continuity of programming; however, 2004 has started with a rejuvenated spirit that has helped to successfully launch programs targeted at the City’s youth. Second, in May/June of 2003, the EOHRC sponsored a survey on race relations. Approximately 180 persons participated in this survey (which was produced in English and Spanish). The results, while not widely circulated, are wonderfully insightful with regard to how racial/ethnic groups in the community view the same issues. Third, the EOHRC is responsible for the City’s Fair Housing & Equal Opportunity Complaint and Compliances Process and System (see “complaint procedures”, below). This is a formal procedure for handling discrimination complaints made to the City. The program includes formal intake, referral, and conflict resolution processes. In addition, the program is promoted through bi-lingual brochures (How to File a Housing Complaint) that are circulated throughout the community.

Loan Programs

The City has created three separate residential loan programs intended to provide housing improvements targeted to assist elderly, low-moderate income, and disabled families and individuals.

Owner Occupied Low Interest and Deferred Payment Loans: The purpose of this program is to assist owner-occupants in addressing rehabilitation needs as necessary to meet the City of Beloit’s Property Maintenance Code, the Wisconsin Uniform Dwelling Code, and other appropriate property rehabilitation standards. The program will provide loans (minimum \$1000) up to 100% (95% for deferred loans) of the fair market value, less any outstanding debt against the property. The total debt, including the rehabilitation loan, cannot exceed 40% of the applicant’s gross income. If the applicant’s income is less than 80% of the county median income and (s)he has the ability to pay, (s)he is eligible for a 3% loan amortized up to 15 years; if the applicant’s income is less than 65% of the county median income and (s)he has no ability to pay, (s)he will be eligible for a deferred payment loan; and if an applicant is income eligible and over the age of 60, or disabled, (s)he will be eligible for a deferred payment loan. Deferred loans require annual income review and will be

converted to an installment loan should incomes exceed requirements, the property ceases to be the owner's principal place of residence, or the property is sold and/or title transferred.

Rental Housing Rehabilitation Loans: Since the number of renter households in need of housing assistance outnumber owner households by a four-to-one margin, the purpose of this revolving loan program is to assist in upgrading and increasing the availability of rental units for persons of low-moderate incomes. Eligible costs include rehabilitation to meet code violations, to convert non-conforming residential uses to a conforming use, or to address the costs of energy conservation work. Eligible properties must be renter occupied or a vacant rental property and require at least \$1000 of rehabilitation work. Applicants must agree not to raise the rent for a period of three years from the date of occupancy or to rent to a low-moderate income household and continue to do so for a period of three years from the date of the loan's closing (note: a 3% increase in base rent is allowed after year one; a 5% increase after year two). The loan can be up to 100% of the fair market value of the property less any outstanding debt against the property. The maximum amount of any loan is \$20,000 for single-family rental and \$25,000 for multi-family rental units. The maximum term of the loan is ten years and the minimum payment is \$25 per month.

Construction Loan Program: The purpose of this program is to catalyze the rehabilitation and resale of residential properties to individuals or families with the commitment to occupy and maintain the property. The program is intended to address rehabilitation needs in order to meet building codes or energy conservation improvements. The property must require a minimum of \$1000 of work and the loan can be up to 100% of the fair market value of the property less any outstanding debt against the property, with a maximum loan of \$25,000. The applicant must agree to sell to a low-moderate income family. If the property does not sell within six months after completion of the project, the owner/applicant must agree to rent to low-moderate income households or continue to offer the property through a licensed real estate company at fair market value. The maximum term of a loan is twenty years and the minimum payment is \$25 per month. It is generally expected that the loan is repaid upon sale of the home; however, the loan may be transferred to the new owner subject to income limitations.

Health Department Ancillary Services

The City's Health Department operates a unique program that is intended to assist elderly and physically challenged individuals remain in their homes (avoiding, in some cases, institutionalization). The Home Companion Registry was started in 1985 to provide custodial care services to City residents (i.e., Medicare won't pay for such services as bathing, help getting dressed, groceries, laundry, etc. unless the patient is institutionalized). The program serves as a "stop-gap", providing assistance to clients as they wait for an opening in the Rock County Long-Term Support program (there is a 2-year waiting period). There are no income limitations or requirements for doctors' orders to use the HCR. The HCR currently provides care services from 2 to 24 hours in

length. Clients pay the providers directly at an established rate of \$8.25/hour. The City conducts background checks and provides training through the local technical college (40 hours in “Personal Care”). In addition, the City provides continuing education opportunities through in-service training. There are currently 89 care providers serving 92 clients. Approximately 70% of the clients are in the moderate-low income range (51%-80% of median) and the majority are elderly (age 62+). The program is funded jointly through the City (CDBG) and the United Way. The program director is currently discussing ways to bring more minorities, particularly Hispanics, into the program as both clients and care providers.

City Codes and Ordinances

A desk review of the City’s municipal code was conducted. Particular attention was paid to those areas of the code that address physical development and participation in the governing process. A brief section-by-section analysis of pertinent sections follows.

Chapter 1.25: Fair Employment and Affirmative Action

This is a very proactive statement in that it seeks to move beyond “discrimination” to increase the number and representation of affected and/or other under-represented groups in all departments, job classifications, and salary categories. It also extends to vendors, contractors, and firms that do business with the City (1.a).

The City’s recruitment process also takes a proactive stance by trying to move beyond simple advertising to include “work with appropriate community resources to develop techniques, models and strategies that will maximize the recruitment of affected and/or other under represented groups (5.a).

Chapter 1.27: Plan Commission

The membership of the Plan Commission includes seven citizens who “should reflect the diverse nature of the City’s population” (2.b). Members are nominated by the Appointment Review Committee (which includes citizens and City Council members) and are appointed by the Council President with confirmation by the City Council (3.b). The City Council President and one City Council representative may serve as ex-officio (non-voting) members of the Commission (2.a, 2.c). The terms of members are limited to no more than two successive three-year terms (4.c).

The Plan Commission includes the provision for the creation of subcommittees. Appointments to standing or temporary (six month life expectancy) subcommittees are made by the commission chair subject to confirmation by the commission (16.a); however, it is interesting to note that subcommittee membership is not limited to members of the commission (16.b).

Chapter 1.37: Equal Opportunities and Human Relations Commission

[See previous discussion on EOHRC] The EOHRC consists of 8-9 members, seven citizen members (2.b) along with the City Council President and one City Council representative sitting as ex-officio (non-voting) members (2.a). The EOHRC was created in December 2000 through the merger of the Equal Opportunities

Commission (six citizen members) and the Human Relations Committee (six citizen members) (4.2). The original membership terms were staggered and lapsed as such (i.e., 4 in 2001, 4 in 2002, and 4 in 2003). New members were appointed for 3-year terms, and were limited to two successive terms (including service on the previous commissions) (4a, 4b, 4c). There is a residency requirement (5.a) and the requirement that “the commission shall be representative of both sexes and of each racial group residing within the City as classified by the most recent U.S. Census Bureau statistics” (5.b). One problem with this requirement is that the 2000 Census now differentiates between race and ethnicity, thus Hispanic is no longer a racial classification. Another problem is that the ordinance does not specify that the representation shall be “proportional”, although that appears to be the intent of the clause.

The EOHRC has an attendance requirement that states “any member who is not planning to attend a meeting shall notify the commission chair of that fact at least 24 hours in advance of the meeting; any member who misses more than 25 percent of the regular meetings during any year of his or her term shall be subject to removal from the commission; the City Council President and the City Council representative are not required to attend commission meetings” (14). This requirement does not seem to be enforced, although staff tracks attendance.

The subcommittee procedures are similar to those of the Plan Commission in terms of appointment and membership (i.e., subcommittee members need not be members of the commission) (16).

Chapter 1.39: Community Development Authority

The CDA was created in 1982 through the dissolution of the former Housing and Redevelopment Authorities and the transfer of their respective powers, duties, properties, contracts, indebtedness, etc. to the CDA (sections 1, 2, and 3). The Community Development Authority “is deemed a separate body corporate and politic for the purpose of carrying out blight elimination, slum clearance, urban renewal programs and projects and housing projects” (2).

The membership of the CDA consists of 7 or 8 commissioners: the City Council President, two City Council representatives (one of whom may also be the City Council President) (4.a) and five citizen members (4.b). The citizen members are nominated by the Appointment Review Committee and are appointed by the City Council President, subject to confirmation by the City Council (5.b). The City Council representatives are appointed by the Council President and subject to confirmation by the Council (this occurs at the Council’s “organizational meeting” in April of each year)(5.a). City Council representatives serve one-year terms while citizen members are appointed for 4-year terms (based on January 1 start and December 31 end dates)(6.a). No citizen member may be appointed for more than one full term (i.e., reappointment is possible one year after completion of a term)(6.c). All five of the citizen members and up to two Council representatives are voting members (4.c). In addition, one citizen member is elected to serve as the

CDA's representative to the City of Beloit Economic Development Advisory Council (4.c.4). All members are subject to residency requirements (7.a).

The CDA meets regularly on the 4th Wednesday of each month (9.a) and special meetings may be scheduled at the request of the chair or three voting members (9.b). The chair and vice chair are elected annually at the CDA's January meeting (10.a). In addition, the CDA shall appoint an Executive Director as the chief administrative officer (10.b) who is directed to "consult with the Assistant City Manager on all issues involving the Community Development Authority's exercise of its redevelopment powers" (10.b).

The CDA has an attendance policy that allows the removal of any member who misses more than 25 percent of the regular meetings during any year of his or her term (not including ex-officio members)(16). In addition, there is a requirement that "if a City Council representative misses 3 meetings during the council representative's one-year term in office, the City Council representative shall [emphasis added] be removed as a member of the Authority by the City Council President, subject to confirmation by the City Council" (16).

The CDA has subcommittee powers similar to the Plan Commission, where membership on a subcommittee does not require membership of the Authority (18).

Chapter 7: Property Maintenance Code

The City has a comprehensive property maintenance ordinance. The code is generally based on the "BOCA Basic Housing –Property Maintenance Code", 1970 edition and 1971 Supplement and the "BOCA National Property Maintenance Code", 1990 (7.01). The overall ordinance is very clear and includes sections on standards, enforcement, complaints/inspections/appeals/penalties, as well as specific sections dealing with physical standards.

Single-family, owner-occupied structures are inspected City-wide or if a written complaint based on exterior conditions from a resident or a City, State or local government agency or a building or health official (7.06). Rental units are inspected based on complaints or "under a systematic cyclical schedule" (7.06).

An appeals process flows through the City Manager (1.15(e)), and those decisions may be appealed to circuit court (1.15(f)). The identity of Complainants remains confidential (unless authorized or the Complainant is a governmental agency) (7.08). Anonymous complaints won't result in an interior inspection unless "there is reason to believe there is an immediate and grave danger to the occupants" (7.08). Single-family, owner-occupied structures are inspected City-wide or by complaint (7.06). Rental units are inspected based on complaints or "under a systematic cyclical schedule" (7.06).

The sections on condemnation/vacation (7.22), exterior property (7.23) and structure (7.24), interior structure (7.25), basic facilities (7.26), installation and

maintenance of equipment and fixtures (7.27), occupancy requirements (7.28), light and ventilation (7.29), and safety from fire (7.30) are standard and represent the state of the practice. There are sections on the Responsibilities of Occupants (7.31) and Lead Poisoning Prevention and Control (7.33) that are particularly applicable in low income housing situations. The responsibilities of occupants address general cleanliness, disposal of rubbish and garbage, use, operation installation and care of plumbing fixtures (7.31). The requirements are not overly burdensome, however, they provide public officials with an opportunity to enforce basic sanitation objectives. The lead poisoning prevention and control ordinance is intended to take an aggressive stance against lead poisoning, particularly in children 7 years of age or younger (7.33). The ordinance sets out a variety of prohibitions (including the transaction of certain goods with lead based finishes), a diagnosis program, an abatement process, and emergency hazard reductions. The health department has broad intervention powers to require abatement and hazard reduction in cases where a child age 7 or under is discovered to have a blood level concentration of 70 micrograms per 100 deciliters. The ordinance does not address disposal of removed lead based materials or exterior lead level abatement (which has proved to be a major health issues in some other older Midwestern cities). The ordinance charges the City administration with the development of an educational program for parents, educators, and property owners.

Chapter 8: Plumbing Code

The City has adopted the State Plumbing Code (Chs. ILHR 81, 82, 83, 84 and 85, Wis. Adm. Code, and Ch. 145), with the exception that the penalty provisions under the State Code shall not apply (8.04). The City requires the licensing of plumbers (8.07), and obtaining of permits prior to work (8.06). The cost of permits are generally very reasonable, and do not exceed \$25 for most common work (8.18).

Chapter 9: Building Code

The City has adopted the State Uniform Dwelling Code (Chs. COMM 20-25, Wis. Adm. Code, and Subchapter II of Ch. 101, Wis Stats., including any subsequent amendments)(9.04). In addition, the City has adopted the State Building, Heating, Ventilating and Air-Conditioning Code (Chs. COMM 50-64), the State Uniform Multi-Dwelling Code (Ch. COMM 66), and the State Rental Unit Energy Efficiency Code (Ch. COMM 67) and any subsequent amendments (9.05).

The Director of Housing Services is authorized and directed to administer and enforce the ordinance (9.07) and appeals are routed through the City Manager (and possibly from there to circuit court) under the general municipal administrative procedure (1.15). Permits are required for all repairs, maintenance, or alterations valued in excess of \$500 (9.12). A certificate of occupancy is required and a new certificate must be issued when a change in the use of the building occurs (9.15). It does not appear necessary to obtain a new CO when a change of tenancy occurs.

Fees for new construction are based on floor area (9.28). New residential buildings are \$5.00 for every 100 square feet, but not less than \$50; additions are the same rate

with a \$75.00 minimum charge; plan approval for new 1 & 2 family units costs \$50.00 while the review of plans for additions/alterations on 1 & 2 family units costs \$25.00. Occupancy permits (including a change in permit) cost \$25 per residential unit (not to exceed \$500). The fees for alterations, repairs, roofing and siding are reasonable, starting at \$15 for the first \$1000 of work and adding \$4 for every \$1000 of work up to \$40,000 (a fee of \$171). Exempt from this fee structure are insulation, flooring, carpeting, painting & decorating, gutters (only), roof venting (only), insulation (only) and items which are not structural. There are separate fee schedules for heating, plumbing, and electrical work. Furnaces are based on BTU output: \$20 up to 100,000 BTU, \$30 for 101,000-150,000 BTU, \$40 for 151,000-200,000 BTU, and \$60 for over 200,000 BTU. Air conditioning permits cost \$12.50 for up to 10 tons (120,000 BTU) and \$33 for over 10 tons. Plumbing permits range from \$7 per meter/fixture/appurtenance to \$30 for sewer or water lateral improvements. There is a detailed list of electrical fees, however, they generally range from \$0.40 per fixture, switch, receptacle or outlet to \$35 for in-ground pools, hot tubs and spas. The failure to obtain appropriate permits prior to commencing work generally results in the doubling of fees.

Chapter 12: Subdivision and Official Map Ordinance

The City has a comprehensive subdivision and official map ordinance, dated December 3, 2001 (revised February 18, 2003). The ordinance is state-of-the-art and reflects a very reasonable approach to the preservation of public rights and rights-of-ways (e.g., standards do not require excessive dedications which drive up the price of new housing).

In addition, the ordinance includes a section on cluster developments (as required by Wisconsin's smart growth legislation)(12.08). There is an inconsistency between the subdivision ordinance (12.08(4)) and the zoning ordinance (7.2.3.e) that should be reconciled. The subdivision ordinance specifies a minimum lot size of 6,000 square feet and a maximum of 2 acres, while the zoning ordinance specifies "no minimum lot size" (although it states "minimum lot sizes may be established by the City during the subdivision plan approval process").

Chapter 19: Zoning Code

The City has an excellent comprehensive zoning code that was adopted September 17, 2001 and receives regular updates and revisions. The code is extremely clear and well organized, which makes for good comprehension by all audiences. A brief review of some key issues follows.

§2.1.5 Notices: The code requires that notices for zoning changes be mailed to "the applicant and all property owners within 150 feet of the subject property"; however, the point of demarcation (i.e., where does 150 feet start?) is not identified (e.g., nearest boundary line, doorstep, center of lot, etc.). While the code does not require notification of non-owner residents, the practice of the City has been to notify these households. Given the high rental rates in the City, this is a commendable practice.

Bilingual notices should be considered. Also, on-site notices (e.g. signs) should be considered.

§2.3.6 Protests: Petitioners are limited to adjacent property owners. A valid petition against a zoning change (which could trigger a $\frac{3}{4}$ majority vote requirement at the City Council) requires that “the owners of 20% or more” of the land included in the application, within 100 feet (measured from the edge of the outer boundary of the subject property), or directly opposite (measured as 100 feet from the street edge of the subject property) shall sign the petition. It is noted that this is a common municipal practice; however, it fails to consider the impacts of zoning changes in areas where there are high levels of rental properties. While it would be unusual, Beloit could reasonably consider the inclusion of residents along with owners. This may require some sort of other verification process (e.g., checks against certificates of occupancy, voter records, or utility bills, for example).

§ 2.11 Traditional Neighborhood Developments: Also see §5.7. The ordinance was amended in December of 2001 to include the TND sections. This is viewed as a positive benefit to affordable housing issues as TNDs tend to allow higher levels of residential density in exchange for a comprehensive site plan.

§4.0 Base Zoning Districts: This section identifies the basic requirements and allowed uses of the base zoning districts.

R-1A is a single-family residential district primarily intended to accommodate detached units on large size lots, typically at 2-5 units per acre;

R-1B is a single-family residential district primarily intended to accommodate detached units on moderate size lots, typically at 3-7.25 units per acre;

R-2 is a two-family residential district intended to accommodate two-family, single-family detached and single-family attached dwellings at typical densities of 4-10 units per acre;

R-3 is a low-density multi-family residential district primarily intended to accommodate low-density development at a density of up to 25 dwelling units per acre.

R-4 is a moderate density multi-family residential district primarily intended to accommodate moderate-density development at a density of up to 50 dwelling units per acre.

§5.3 PUD, Planned Unit Development District: This is a special purpose zoning district that permits greater flexibility of land planning and site design. The result is a master-planned development that may utilize innovative architectural design, placement and clustering of buildings, encourage conservation of natural features, provide for efficient use of public services, and promote an attractive/safe residential and/or mixed-use environment.

§5.7 Traditional Neighborhood Development District: This was added to the zoning ordinance in December of 2001 pursuant to Wisconsin Statutes (§66.1027 and 62.23). The TND style of development allows for more compact, mixed-use

development that is designed at a “human scale”. The TND allows “secondary dwelling units” (e.g., “granny-flats” or apartments within the primary structure or above the garage), as well as zero-lot-line dwellings. The ordinance includes provisions for additional density if affordable housing units are included. §5.7.2 defines affordable housing as “housing in which mortgage, amortization, taxes, insurance and condominium and association fees, if any, constitute no more than 28 percent of gross household income for a household of the size which may occupy the unit. In the case of dwelling units for rent, housing that is affordable means housing for which the rent and utilities constitute no more than 30 percent of gross annual household income for a household of the size, which may occupy the unit.” §5.7.3.b.1.d reads “for each affordable housing unit provided under this section, one additional dwelling unit shall be permitted, up to a maximum of 15 percent increase in dwelling units.” These requirements, if implemented, have the potential to increase the availability of affordable housing units placed within a high quality urban setting.

§7.0 Density/Intensity and Dimensional Standards: This part of the ordinance contains the physical development standards, generally displayed in easy-to-read tabular format. §7.1 contains the following table describing residential districts:

DEVELOPMENT STANDARD	ZONING DISTRICT				
	R-1A	R-1B	R-2	R-3	R-4
Maximum Density (dwelling units/acre)	5.00	7.25	10.00	25.00	50.00
Minimum Lot Area (square feet)					
Single-Family	8,750	6,000	6,000	6,000	6,000
Two-Family	NA	NA	8,750	8,750	8,750
Multifamily	NA	NA	NA	8,750	8,750
All Other Uses	8,750	8,750	8,750	8,750	8,750
Minimum Lot Width (feet)	70	50	70	70	70
Front Setback (feet)	30	20	30	30	30
Interior Side Setback ¹	5 feet, with a combined total of 20 percent of the lot width or 20 feet combined, whichever is less				
Street Side Setback (feet)	30	20	30	30	30
Rear Setback (feet)	30	30	30	30	30
Maximum Height (stories/feet)	2 1/2/35	2 1/2/35	2 1/2/35	No max	No max

¹ Side yard setback requirements shall be rounded off to the nearest foot by the City official, with fractions of 0.50 or less rounded down and 0.51 or greater rounded up.

The smallest allowed lot size is 6,000 ft² which equates to 50’ wide by 120’ deep. These are moderate lots that are quite conducive to the construction of affordable homes. §7.2 addresses Alternative Residential Development Options. These allow for a variety of development styles while maintaining the overall character of a single-dwelling neighborhood. These options include the use of single-family attached (i.e., townhouse or rowhouse) structures by exempting lot width and area requirements (but maintaining base density requirements). The section also allows cluster developments where smaller lot sizes (no minimum is required, although a

10-foot set-back from other structures is necessary) in exchange for an increase in common open space.

In conclusion, the City of Beloit zoning ordinance includes a number of progressive planning mechanism that can be used to foster high quality, yet affordable housing developments. In addition, regulatory barriers, such as large lot size zoning, are virtually non-existent. The ordinance does not limit unrelated persons from residing in the same unit. Also, the ordinance does not include an “inclusionary zoning” requirement, as is becoming popular in many other urban cities. However, citing Beloit’s current affordability, it is unlikely that such a requirement would greatly affect the market.

Chapter 20: Fair Housing Code

The City has a comprehensive fair housing code that is administered by the Equal Opportunities and Human Relations Commission (see §1.37, above). The declaration of policy reads as follows:

It is the policy of the City, pursuant to the United States and Wisconsin Constitutions, and also its power to protect the public health, safety and general welfare, that all persons, regardless of sex, race, color, sexual orientation, handicap, religion, national origin, familial status, sex or marital status of the person maintaining a household, lawful source of income, age or ancestry, are entitled to fair and equal access to housing and, to that end, the City hereby enacts this chapter which prohibits any person not herein exempted from discriminating against any other person by impairing to any degree access to any housing or housing accommodations on the basis of sex, race, color, sexual orientation, handicap, religion, national origin, familial status, sex or marital status of the person maintaining a household, lawful source of income, age or ancestry, and creates a Commission with the power and duty to enforce equal opportunity in housing for all citizens of the City.

The powers and duties of the commission are as follows:

- (a) Adopt, amend, publish and rescind rules for governing its meetings and hearings.
- (b) Adopt, amend, publish and rescind regulations consistent with and for the enforcement of this chapter.
- (c) Appoint such other employees, agents and staff as are necessary to promote the purposes of this chapter, subject to the approval of the City Manager, subject to City Council budgetary approval, and to prescribe their duties. (Am. #2334)
- (d) Receive and investigate all complaints alleging any discriminatory practice prohibited by this chapter.
- (e) Appoint mediators who initially shall seek a settlement agreeable to the complainant and the respondent by means of informal conferences, any compensation therefore subject to the City Manager's approval and City Council budgetary approval. (Am. #2334)
- (f) If necessary, hold hearings after efforts at settlement, based on complaints made against any person and a determination of probable cause; administer oaths and take testimony; compel the production of books, papers and any other documents relating to any matters involved in the complaints; and subpoena witnesses and compel their attendance. If a witness either fails or refuses to obey a subpoena issued by the Commission, the Commission may order

attendance. At any time after it has issued such an order, the Commission may petition a court of competent jurisdiction for its enforcement.

- (g) To issue, after hearing, such final orders as are necessary to promote the purposes of this chapter.
- (h) Issue temporary orders effective for a maximum of 20 days, except in extraordinary circumstances, restraining the respondent from taking any action which would tend to render ineffectual or unenforceable any order which the Commission might issue.
- (i) Refer orders, pursuant to §20.05, to the City Attorney to be enforced by him in the name of the City.
- (j) Make available to the public in writing copies of: (Am. #2915)
 - 1. Transcripts of all of its proceedings, except initial settlement efforts by its mediators.
 - 2. All temporary and final orders.
 - 3. All decisions and opinions rendered and budgetary provisions to be made therefor.
- (k) Require a written report of the manner of compliance with any final order it may issue.
- (l) Recommend to the Council any budget or legislation necessary to further promote the purposes of this chapter and file annual written reports of its work with the City Clerk.
- (m) Grant actual damages or arrange to have adjudicated in court at agency expense the award of actual damages to an aggrieved person. (Cr. #2334)

The code has an extensive list of prohibited acts (20.03) that ranges from refusal to sell or rent to coercion, intimidation, threats, and a variety of real estate transaction based activities. In addition, there are specific prohibitions on discrimination based on handicap (20.035). This section also addresses some “visitability” issues, such as requiring all multi-family housing constructed after March 1991 to provide at least one building entrance on an accessible route, ensuring doors are sufficiently wide to allow use of wheelchairs, and to ensure that an accessible route into and through dwelling units and all light switches, outlets, thermostats, etc are accessible. The City has adopted the American National Standard for Buildings and Facilities providing accessibility for physically handicapped people (ANSI A117.1-1986).

The section on Enforcement Procedures addresses the complaint process. It also authorized the Commission to “upon complaint may test and investigate for the purpose of establishing violations of this chapter and conduct investigation and studies to carry out the purpose of this chapter” (20.05.11).

Section 20.06 on remedies and penalties allows the Commission to issue cease and desist orders, mandate affirmative action by the respondent (and where necessary, the complainant), or to assess penalties of not less than \$50 nor more than \$200 or 30 days in jail (with each day a violation continues considered as a separate offense).

External Relations

Based on focus group activities and stakeholder interviews conducted as part of this project, it appears that the City and its staff have excellent relationships with representatives of the private and civic (nonprofit) sectors. While not every department and/or agency was reviewed, it was clear that the Department of Community Development and the City Manager’s offices had established strong, working relationships with a wide range of organizations. There was direct evidence of collaboration and cooperation between the City and financial institutions, real estate professionals, nonprofit organizations, religious organizations, and institutions of higher education. The representatives of the private and

public sector were eager to participate and provided valuable information and insight regarding the fair housing environment in the City.

Summary of Analysis of Complaint Procedures

Review Process

The Equal Opportunities and Human Relations Commission has responsibility for implementing the discrimination complaint process on behalf of the City. Since 1998 this has been accomplished through a contractual arrangement with *New Directions Management Services, Incorporated*, a Wisconsin business corporation with its principal offices located at 419 Pleasant Street in Beloit. The contract expired on December 31, 1999 but contains a clause allowing renewal in one-year terms upon written mutual agreement. The contract also includes a 30-day written termination clause. Through this contract, the City agrees to provide an employee to receive housing complaints. This is accomplished by a clerk/typist located in the City Human Resources Department office. The City also agreed to “recruit bilingual persons and persons of color to assist the intake worker with the interview process”. This is accomplished through volunteer relationships with community groups (e.g., El Centro and the Latino Coalition). The consultant provides the following services:

- Review of intake systems and procedures for quality improvement and compliance with City Council and requirements of external agencies (e.g., HUD).
- To provide training to the intake worker and volunteers on intake and discrimination interview processes; to supervise volunteers; and to provide training to the EOHRC regarding the Fair Housing Code.
- To investigate, mediate, and prosecute housing discrimination complaints. If, after the initial intake interview, it appears there is merit to the complaint, the consultant will further investigate to determine if a discrimination violation has occurred. If the consultant concludes that probable cause exists, the consultant may negotiate a settlement, refer parties to mediation (paid for by the City), refer the matter to the City Attorney for prosecution before the EOHRC, or refer the complainant to the Wisconsin Equal Rights Division.
- The consultant is to develop performance indicators and prepare quarterly reports to the City Manager based on such.

In March 1999 the consultant provided the EOHRC with The Fair Housing & Equal Opportunity Complaint and Compliance Process & System: Procedures for Handling Complaints Submitted to the City of Beloit Equal Opportunities Commission. This document implements the Fair Housing Code by providing administrative processing and resolution initiative techniques to individuals who (1) reside in the City of Beloit, or (2) allege discrimination which occurred by an employer, educational institution or recreational facility located in the City of Beloit. This document specifies multi-stage processes for dealing with housing and non-housing related complaints about discriminatory actions. These processes generally follow the following steps:

- Intake/Pre-Complaint Stage: The complainant contacts the City’s intake officer who conducts an initial interview to collect basic background (e.g., demographic information for CDGB purposes) and contact information (a

formal questionnaire form is used). If there appears to be merit to the complaint, the process moves to the next stage.

- Counseling Stage: This is an opportunity to collect additional information, do fact-finding, and for the complainant to complete the written, formal complaint form. If it appears that no formal discrimination has occurred, or if the circumstances merit, the consultant may refer the complainant to other agencies. The consultant (or staff) will often contact the relevant parties to gather information. If appropriate, the consultant may suggest third party mediation. If both parties agree, they will be referred to a third party mediation/resolution services firm. If the parties do not agree, the process may move to the formal complaint process (see below).
- Mediation/Resolution Services: A third part mediator is asked to attempt to broker an agreement between the parties. If resolution is successful, the case is closed. If the process is not successful, the process will move to the next stage.
- Formal Complaint Stage: A formal complaint investigation process, including witness affidavits and other investigation, takes place. The formal complaint is completed and forwarded to the City Attorney. The case moves to the EOHRC for a formal hearing.

While complaints are most often lodged against individuals, there are also mechanisms to pursue complaints against lending institutions.

The Process contains detailed instructions regarding data collection, securing testimony, confidentiality, etc. and includes a number of exhibits regarding intake forms, letters of notification, etc.

The consultant creates a case log, tracking each pre-complaint and complaint, logging contacts and actions as the issue progresses. Each pre-complaint is assigned to a file where all materials are kept. The housing discrimination case files for 1999 to 2002 were reviewed and analyzed for the purposes of completing the AI report. Files for 2003 were not made available for review.

Summary of Findings

A total of 38 cases were reviewed for the four-year period. Of these, ten constituted discrimination complaints while 28 were of a landlord-tenant dispute nature. Four cases went to mediation, fifteen cases were closed due to non-responsiveness by the claimant, sixteen were resolved on their own or referred to other agencies, and the disposition of three cases are unknown. No cases were known to have progressed to an EOHRC hearing or filed as lawsuits or complaints through other avenues. Demographic information is not fully available due to the incomplete status of many of the intake forms. The composition of complainants was estimated as follows: 7 white females, 1 white male, 18 black females, 6 black males, 2 Hispanic males, 0 Hispanic females, 2 individuals with handicaps, and 5 unknown (note: double counting is possible). In general, the case files were incomplete. The earlier years (1999-2000) seemed to have a higher quality of information; however, there

was a significant decline in documentation in the years following. No information for 2003 was available for review.

Fair Housing Discrimination Suits

The desk review and interview process revealed there are no discrimination suits currently filed against the City of Beloit.

There is, however, one case that is currently being discussed between HUD and City officials. Due to the confidential nature of the case, details are not available; however, it appears that there will be a resolution without intervention by the courts and a determination by HUD that there was no discrimination appears imminent.

Identification of Other Fair Housing Concerns

City Discrimination Complaint Process

There are a number of concerns regarding the way in which the current City complaint process is being handled. First, it appears that bilingual accommodations are lacking. While the EOHRC has published brochures in English and Spanish, there does not seem to be a standard process for collecting intake and interview information from Spanish speaking individuals. Second, the quality of the documentation with regard to the process has deteriorated substantially. This concern is specific to the completion of the intake forms (including the HUD-required demographic and income data) and the general status of the complaint files themselves. Third, there are questions as to whether or not the consultant is meeting all of the obligations of the original contract. No quarterly reports, as required by the contract, were available for review. No documentation of training for staff, volunteers, or the EOHRC was found. The City and the EOHRC may wish to re-evaluate their current complaint-based process in light of its limited impacts.

The EOHRC nor any other organization is currently engaged in a “testing” program. This has been shown in many other cities to be among the most effective means of educating and enforcing fair housing policies in the community.

Boards and Commission Composition

Ordinances regarding all of the boards and commissions of the City include the statement with regard to membership that the body “should reflect the diverse nature of the City’s population.” However, it appears that this requirement may be implemented only informally. No formal mechanism for tracking the composition of boards and commissions with regard to race, gender, age, or area of residence currently exists. The recommendations of this report will address this reportable condition.

The EOHRC regulates itself and has historically sought out needed members for the Commission. The Commission has proactively recruited and enlisted the participation of individuals representing a variety of ethnic and racial groups who were subsequently appointed by the City Council.

Bi-Lingual City Staff

As the Hispanic population of the City grows, it is becoming increasingly apparent to program managers that they will need to produce bi-lingual materials (or parallel, translated materials) to reach these citizens. There is evidence that staff is aware of and taking proactive steps to meet these needs in all areas of municipal function. However, the need to recruit and retain bi-lingual staff is an area of concern. It was reported that the Police and Fire Departments have begun the conscious process of hiring bi-lingual staff members. It was also reported that the Human Resources Department makes use of volunteers from El Centro, a nonpartisan information and referral program working within Beloit's Hispanic community. This issue will be addressed further in the recommendations section.

IV. Identification of Impediments to Fair Housing

In addition to the analyses presented above, the AI process included a process of interviews with stakeholder groups and a focus group. The results of these activities are incorporated into the identification of impediments discussion.

Affordability Impediments

City Zoning & Development Regulations

The City zoning and development regulations are comprehensive and progressive and pose no barrier to affordable and fair housing goals for the City. In fact, the opposite is true – the progressive nature of these policies seems to have been designed to support the fair housing efforts of the City. This is especially true with regard to (1) low permit fee structures, (2) availability of cluster, TND, and PUD development regulations, (3) modest lot size requirements, (4) requirements that multi-family units meet basic visitability standards.

Resident Opposition

The review of the discrimination complaint files, along with limited media accounts, confirm that there are indeed deep-rooted racism issues in the community. However, the stakeholder interview/focus group process indicates that there are many groups working to erase these issues. The EOHRC's "study circles" project is a case in point.

There were no documented cases of formal resident opposition to affordable housing or projects intended to provide supportive services and housing to protected classes.

Supply of Subsidized Housing

Based on the Citywide Housing Market Analysis (April, 2000) and information gained through the focus group process, the supply of subsidized housing is not viewed as a barrier. Beloit is viewed as being the epicenter of subsidized housing in Rock County having 44.4% (1,114/2510) of the federally subsidized housing units in the County. For example, Janesville, the largest city in the County, has no public housing units, has 779 Section 8 units, and 352 units under Section 42 tax credits, compared to Beloit's 131 public housing units, 863 Section 8 units, and 379 units under Section 42. Approximately 28% of all renters in the City benefit from some form of rent subsidy (i.e., 324 low-income Section 42 units plus 1,114 subsidized units divided by the Census figure of 5,093 rental units).

Beloit's waiting list for vouchers includes 837 applicants and the list for public housing units includes 501 applicants as of October 1, 2003 (duplication is possible); however, it has been reported that these applicants are from throughout Rock County (i.e., only Beloit and Edgerton provide public housing).

The primary concerns in Beloit seem to be (a) that the City carries a disproportionate number of the County's subsidized households and (b) the issue isn't affordability, its adequacy. There are concerns that the quality of the housing stock, particularly rental housing, is not what it could be.

Financial Impediments

Origination and Denial Rates

The previous discussion regarding HMDA data (see Table 2-4) indicates that loan origination rates are lower in census tracts 15, 17, 18, and 23 where non-white populations exceed 25%. However, the consensus among focus group participants and interviewees was that the financial community was taking a very progressive approach to meeting their fair housing requirements. Participants cited a variety of efforts to work with Neighborhood Housing Services to create education programs, to provide flexible loan programs (e.g., low and no-down payment loans). However, these participants also cited problems in getting loans for the many New Americans (and illegal immigrants), stating that predatory lending was very common (although not with regard to major local financial institutions), and that foreclosure rates were very high.

Language Barriers

Three major banks with local branches have now added bi-lingual mortgage specialists (Blackhawk State Bank, M&I, and First Federal). These individuals understand the local housing environment and have been successful not just in bridging the language gap, but also in providing education and creating innovative mechanisms to assist New Americans in making home purchases. The largest problem seems to be how to help people who may not have a credit history. One interviewee indicated she helped people establish credit by opening certificates of deposit and then taking a loan against the CD. It was also reported that WHEDA utilized an alternative credit calculation based on rents and utilities paid.

Discriminatory Impediments

There is a general sense that the community is becoming more integrated; however, stories of racism were common. There is a continued need for education, community dialogue, and efforts to bridge the racial divide. Discriminatory behavior in Beloit has become more complex with the recent increase in the Hispanic population. No longer are the issues simply “black and white”, the issues are now how to address relationships with a new culture that is viewed by many as “foreign” to the area. Hispanics reported a wide range of institutionalized racism in nearly every area of the community – from schools to jobs. There seems also to be a tendency among Hispanic residents to not participate in the existing fair housing and discrimination complaint processes, providing another reason to review the City’s current procedures.

Discrimination also seems to be an issue for persons with disabilities. Persons with HIV were reported as having difficulties finding housing. However, and perhaps not surprisingly, the complaint logs do not include any HIV issues.

Accessibility Impediments

Building Codes

The building codes do not seem to pose an impediment to accessibility. As previously reported, the codes are current and proactive with regard to multi-family units.

Unfortunately, the age of the housing stock may pose a barrier for visitability purposes. The City may wish to examine alternative ways of addressing this issue.

Community Advocacy Groups

There are a wide range of advocacy groups that are active in social services, community support, and housing activities. A new group of organizations is forming; groups such as El Centro and Even Start, CARE, the Latino Coalition, Hands of Faith, and many others are forging new collaborative partnerships to help address the community's many racially and economically rooted issues. These types of collaboration, as well as continued partnerships with the City and other governmental entities, need to be nurtured and promoted.

What seems to be missing from the mix at this point in time is a well-organized advocacy on behalf of disabled persons. The City has a committee on parking that delves into some accessibility issues; however, there does not seem to be much other activity in this area.

V. Municipal Activities to Promote Fair Housing Choice

Introduction

The Analysis of Impediments to Fair Housing (AI) planning process provides an opportunity for the City of Beloit to reflect on the “big picture” with regard to housing, discrimination, and community development issues. While the Consolidated Plan and its associated annual action plans and consolidated annual performance evaluation reports (CAPERS) provide the opportunity to formulate, implement, and monitor a detailed program for community development, the AI takes a systemic approach to its actions and recommendations. The purpose of the AI is not to reiterate the detailed action statements of the Consolidated plan, but to propose responses to issues that may not have previously been discovered and identified. It is in this spirit that the City proposes the following actions.

General action statements are described below under one of four headings: **Fiscal Policy, Physical Development, Governance & Administration, and Community Support & Development.** These categories are not mutually exclusive and the actions described below may fit into one or more areas.

Summary of Analysis and Actions

Fiscal Policy

1. **Predatory Lending Legislation:** Predatory lending issues are in the national housing spotlight. There are numerous opportunities to track these trends and to consider how Beloit may address what is a growing concern, especially among low-income, elderly, and New American populations.
 - a. **Monitor State/Federal Legislation:** Track current events through HUD’s KnowledgePlex or other systems. Be aware of what the legislative issues are and how changes may affect the Beloit area.
 - b. **Local Legislation:** Explore the possibility of creating local laws against predatory lending procedures. Monitor what other local governments are doing and gather “best practices” information from peer organizations and professional associations.
2. **Loan Program Expansions:** The City has a strong heritage of using its loan programs to improve the most fragile neighborhoods. Consider expansions of this approach to address newly targeted groups.
 - a. **Visitability Improvements:** Due to the general age of Beloit’s housing stock, most single-family residential units present physical barriers for those with mobility impairments. Consider the creation of a low-interest loan program that will help property owners incorporate barrier-free accommodations into their properties.
 - b. **Low/No-Credit Home Loan Program:** One of the barriers identified is that many residents, and in particular New Americans, lack necessary credit histories to qualify for home mortgages, even if they have sufficient income. Research methods, such as temporary loans, underwriting secondary mortgage insurance, or other means should be used to assist these people in purchasing homes.
3. **Financial Institution Collaboration:** The City can utilize its position of influence and leadership in the community to convene and sustain a regular means of communication and collaboration among local financial institutions.

- a. Lenders Roundtable: This process would bring key leaders of the financial community together on a regular basis to discuss common issues and interests and to explore ways they can collaborate to improve Beloit and to meet their CRA requirements. This may also be a good group to assist with the Predatory Lending work (see above).
- b. Education Programs: It appears that some of the education programs that are co-sponsored by local banks and NHS seem to suffer from continuity issues. The City could serve as a catalyst for these actions by providing support and encouragement for a wide variety of home ownership and personal financial development training opportunities.

Physical Development

1. Progressive Developments: The City's zoning and subdivision ordinances provide the regulatory tools necessary to implement cluster developments, traditional neighborhood developments, or new urbanist communities. The City needs to promote these concepts within the development community through efforts to educate those involved in the physical design and construction of the community (e.g., presentations to local home builders, realtors, etc.).
2. Redevelopment RFPs: Consider utilizing local government tools and capabilities (e.g., TIF, TID, eminent domain, etc.) to encourage redevelopment of large-scale areas of the City. The process (used in other places across the country) includes the issuance of a request for proposals for development.
3. Vacant Home Program: Other cities have helped to stabilize neighborhoods by getting into the business of purchasing, rehabilitating, and selling homes. It may be necessary to create a new public corporation (or utilize the CDA) and to seek "seed money" to create a revolving loan process that accomplishes this objective. The City's new Neighborhood Development Initiative, while a pilot project focused on two strategic neighborhoods, is an excellent start.

Governance & Administration

1. Board & Commission Composition: While the City's ordinances establishing various Boards and Commissions uniformly state a need to "reflect the diverse nature of the City's population", there is no data to support this goal or formal process to ensure that it is carried out.
 - a. Conduct Study: While collecting demographic data on the current composition of the City Council, Boards, Commissions and City staff is an important part of an affirmative action approach, it is also necessary to discuss and define the goals and objectives. For example, how should the term "diverse nature" be interpreted? Is it racial/ethnic, gender, income, geographic? The EOHRC could be involved in this type of project.
 - b. Implement Changes: Once recommendations are made, the difficult task of implementing them begins. Decisions will have to be made about phase-in, as well as how the Appointment Review Committee and the City Council will view the new process.
2. Fair Housing Testing Program: The City currently does not have an active testing program for fair housing. It is strongly recommended that it devote the necessary resources and/or

develop partnerships with community organizations capable of carrying out an aggressive testing program.

- a. Develop Program: Conduct research of other organizations and communities that currently have testing programs. Collect information on costs and successes, and find the best way for the City to pursue such an endeavor.
 - b. Implement Program: Fund and implement a program.
3. Discrimination Complaint Process: The current discrimination complaint process is not functioning effectively. The number of formal complaints and mediation solutions lags behind those cases that are administratively closed, and the number of Hispanics involved in cases are disproportionately underrepresented. The program is in need of formal review.
- a. Review Current Program: Conduct a review of the program with regard to its successes/failures and strengths/weaknesses; review performance metrics; establish a process for reviewing the contractor; determine if/how the program should continue. Since the EOHRC is charged with implementing this program, they should be charged with developing and implementing the evaluation protocol.
 - b. Implement Changes: Implement changes recommended as a result of the review process.
4. Bi-Lingual City Staff: It was determined that there is a need to formalize a regular process for providing bi-lingual services to residents. There are a number of options that can be pursued to meet this objective, ranging from hiring a formal City interpreter to providing Spanish courses to employees.
- a. Evaluate Current Workforce & Needs: Review existing City staff should determine if and where bilingual personnel may be located. Survey City Departments and agencies to ascertain what the level of service needs are (i.e., some departments may interact with Spanish-speaking residents more frequently than others, thus different approaches may be recommended for various circumstances). Develop a strategy to meet the needs of Departments and Spanish-speaking residents.
 - b. Implement Changes as Necessary: Whether through normal hiring processes, voluntary transfers, City sponsorship of Spanish courses for employees, etc., begin the process of implementing Spanish language resources. Continue efforts to translate the City's forms, brochures, web site, and other materials into bi-lingual formats.

Community Support & Development

1. Campaign to Promote Racial Justice: The CPRJ is an important initiative for the City. It needs some sort of formal evaluation process to help demonstrate its value. While it has been relatively successful utilizing student interns, it needs a dedicated resource stream and dedicated staff if it is to grow and thrive. The program needs to continue efforts to expand, but may also seek additional grant funding (e.g., Topsfield Foundation / Study Circle Resource Center grants).
 - a. Study Circles: Continue efforts to grow the Study Circles program.
 - b. Community Programming: Research opportunities to expand community programming. For example, there are other successful projects (see Pew Partnership for examples) that help to bridge the racial divide. Also consider ways to have a higher profile at community events, public spaces, etc. Continue efforts to develop

partnerships with other community organizations to help address racial polarization issues.

2. Youth Services: There continues to be a need for expanded programming for youths. The potential list is nearly endless. However, a number of specific program ideas were articulated during the public involvement process.
 - a. Youth Advisory Council: The City, like so many other communities, has problems getting people involved in government. One way to begin to address this problem is by finding ways to involve youth in governing the community. There are many examples of Youth Advisory Council programs in communities across the country. While the City has had a Youth Advisory Council in the past, it should examine successful models from other communities and review the strengths and weaknesses of the City's previous effort as part of implementing this recommendation.
 - b. In-School Conflict Resolution Program: Helping young people find alternative ways to resolve interpersonal conflict can not only help to reduce current levels of personal violence, but may be planting seeds for the future. There are many good programs that can be emulated to help teach interpersonal mediation skills to young people.
 - c. Youth Leadership Program: Many communities have immersion-based youth leadership programs. In these programs, youths from diverse backgrounds (and schools) come together in the joint exploration of their community. They gain new insights, understanding and respect for each other and their community.
3. Use Consolidated Plan to Catalyze & Convene: The development of the Consolidated Plan provides an opportunity for the City to bring together groups and individuals who may have shared interests, but may not otherwise find themselves intersecting. The process of convening these groups can serve as a catalyst to other positive benefits in the community.
 - a. Housing & Services Congress: Bringing service providers together around a table to discuss shared interests and concerns and to talk about collaborative approaches to problem solving can provide a synergy to community development efforts. For example, bringing transportation providers, major employers, and housing advocates together may result in new ideas that better serve the residents of the community.
 - b. Partnership Programs: We live in complicated times where government and the private or civic sectors can no longer solve problems working in isolation from each other. The new wave is "multi-sectoral partnership". The City should continue its efforts to deliver community services through partnerships with other organizations. City (CDBG) dollars can be used as seed money or to leverage outcomes that the City or the organizations could not deliver if acting unilaterally.
4. Community-Based Mediation Center: Many communities have volunteer-based mediation services that can be tapped to assist in resolving a wide variety of interpersonal disputes ranging from landlord-tenant disputes, divorce-custody, small-claims, and "barking dog" cases. These centers can help to reduce local case loads in the courts, build the community's "social capital", and help to create a community that embraces its diversity. Such centers usually have one or more staff members who are responsible for intake and training, but the mediators are usually trained volunteers. Such a center could help to address the majority of complaints that came in through the City's discrimination complaint process.
 - a. Explore Concept: Conduct research to ascertain levels of interest, collect best practices and models, and identify any external funding sources.

- b. **Develop Implementation Plan:** Develop a plan to guide the start-up and operation of the center. Implement the plan.
- 5. **Implement: Community Leadership Program:** Many communities have immersion-based leadership programs. These programs are run by a variety of organizations ranging from the City to the Chamber of Commerce to the United Way. While the models vary, the basic idea is to recruit a group of people from diverse backgrounds and provide them with a combination of preparatory (i.e., skill-based) and immersion (i.e., community-based) trainings. The result is a group of people who know their community better, have stronger governance skills, and are more willing to get involved in the community.
 - a. **Community Immersion Program:** Collect information from other programs, present to a variety of other organizations to see if any are interested in sponsoring or participating. Implement the program.
 - b. **Public Housing Program:** The development of a grassroots leadership program for residents of public housing properties can help to provide important organizing skills that contribute to an increased sense of community and an enhanced ability to participate in the systems of governance that affect their lives. Successful models exist that can be adapted for use in Beloit (e.g., Madison's Grassroots Leadership College is one such model).

APPENDIX A : Home Mortgage Disclosure Act Data

AGGREGATE TABLE 5-1:
DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND
VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY HOMES, BY
INCOME AND RACE OF APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
LESS THAN 50% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	0	0.0%	0		0		0		0		0	
BLACK	0	0.0%	0		0		0		0		0	
HISPANIC	8	15.7%	7	87.5%	0		1	12.5%	0		0	0.0%
WHITE	41	80.4%	32	78.0%	3	7.3%	5	12.2%	1	2.4%	0	0.0%
OTHER	0	0.0%	0		0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	0	0.0%	0		0		0		0		0	
RACE NOT AVAILABLE ⁶	2	3.9%	1	50.0%	1	50.0%	0		0		0	0.0%
TOTAL	51	100.0%	40	78.4%	4	7.8%	6	11.8%	1	2.0%	0	0.0%
50-79% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	1	0.8%	1	100.0%	0		0		0		0	
BLACK	4	3.1%	4	100.0%	0		0		0		0	
HISPANIC	8	6.1%	8	100.0%	0		0		0		0	
WHITE	99	75.6%	80	80.8%	5	5.1%	6	6.1%	4	4.0%	4	4.0%
OTHER	1	0.8%	1	100.0%	0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	5	3.8%	4	80.0%	0		1	20.0%	0		0	
RACE NOT AVAILABLE ⁶	13	9.9%	11	84.6%	0		0		1	7.7%	1	7.7%
TOTAL	131	100.0%	109	83.2%	5	3.8%	7	5.3%	5	3.8%	5	3.8%
80-99% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	0	0.0%	0		0		0		0		0	
BLACK	2	2.8%	2	100.0%	0		0		0		0	

MSA Professional Services, Inc.

ANALYSIS of IMPEDIMENTS to FAIR HOUSING
BELOIT, WISCONSIN
July 2004

AGGREGATE TABLE 5-1:
DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND
VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY HOMES, BY
INCOME AND RACE OF APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
HISPANIC	5	6.9%	5	100.0%	0		0		0		0	
WHITE	59	81.9%	52	88.1%	1	1.7%	3	5.1%	3	5.1%	0	
OTHER	0	0.0%	0		0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	4	5.6%	4	100.0%	0		0		0		0	
RACE NOT AVAILABLE ⁶	2	2.8%	2	100.0%	0		0		0		0	
TOTAL	72	100.0%	65	90.3%	1	1.4%	3	4.2%	3	4.2%	0	0.0%
100-119% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	2	4.8%	2	100.0%	0		0		0		0	
BLACK	0	0.0%	0		0		0		0		0	
HISPANIC	1	2.4%	1	100.0%	0		0		0		0	
WHITE	35	83.3%	30	85.7%	2	5.7%	2	5.7%	1	2.9%	0	
OTHER	0	0.0%	0		0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	0	0.0%	0		0		0		0		0	
RACE NOT AVAILABLE ⁶	4	9.5%	3	75.0%	0		1	25.0%	0		0	
TOTAL	42	100.0%	36	85.7%	2	4.8%	3	7.1%	1	2.4%	0	0.0%
120% OR MORE OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	0	0.0%	0		0		0		0		0	
BLACK	1	4.3%	1	100.0%	0		0		0		0	
HISPANIC	1	4.3%	1	100.0%	0		0		0		0	
WHITE	20	87.0%	17	85.0%	0		2	10.0%	1	5.0%	0	
OTHER	0	0.0%	0		0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	0	0.0%	0		0		0		0		0	
RACE NOT AVAILABLE ⁶	1	4.3%	0		0		0		1	100.0%	0	

AGGREGATE TABLE 5-1:
DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND
VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY HOMES, BY
INCOME AND RACE OF APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
TOTAL	23	100.0%	19	82.6%	0	0.0%	2	8.7%	2	8.7%	0	0.0%
ALL INCOMES												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	3	0.9%	3	100.0%	0		0		0		0	
BLACK	7	2.2%	7	100.0%	0		0		0		0	
HISPANIC	23	7.2%	22	95.7%	0		1	4.3%	0		0	
WHITE	254	79.6%	211	83.1%	11	4.3%	18	7.1%	10	3.9%	4	1.6%
OTHER	1	0.3%	1	100.0%	0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	9	2.8%	8	88.9%	0		1	11.1%	0		0	
RACE NOT AVAILABLE ⁶	22	6.9%	17	77.3%	1	4.5%	1	4.5%	2	9.1%	1	4.5%
TOTAL	319	100.0%	269	84.3%	12	3.8%	21	6.6%	12	3.8%	5	1.6%

AGGREGATE TABLE 5-2: DISPOSITION OF APPLICATIONS FOR
CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY HOMES, BY
INCOME AND RACE OF APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
LESS THAN 50% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	1	0.2%	1	100.0%	0		0		0		0	
BLACK	3	0.6%	2	66.7%	0		1	33.3%	0		0	
HISPANIC	27	5.5%	19	70.4%	0		7	25.9%	1	3.7%	0	
WHITE	390	79.4%	269	69.0%	17	4.4%	78	20.0%	20	5.1%	6	1.5%
OTHER	2	0.4%	1	50.0%	1	50.0%	0		0		0	
JOINT (WHITE/MINORITY) ⁵	3	0.6%	1	33.3%	0		1	33.3%	0		1	33.3%
RACE NOT AVAILABLE ⁶	65	13.2%	14	21.5%	2	3.1%	33	50.8%	8	12.3%	8	12.3%
TOTAL	491	100.0%	307	62.5%	20	4.1%	120	24.4%	29	5.9%	15	3.1%
50-79% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	0.2%	2	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	4	0.4%	3	75.0%	1	25.0%	0		0		0	
BLACK	11	1.2%	8	72.7%	1	9.1%	0		2	18.2%	0	
HISPANIC	30	3.2%	22	73.3%	1	3.3%	6	20.0%	0		1	3.3%
WHITE	788	84.5%	596	75.6%	42	5.3%	82	10.4%	50	6.3%	18	2.3%
OTHER	4	0.4%	4	100.0%	0		0		0		0	
JOINT (WHITE/MINORITY) ⁵	14	1.5%	8	57.1%	3	21.4%	3	21.4%	0		0	
RACE NOT AVAILABLE ⁶	80	8.6%	34	42.5%	4	5.0%	23	28.8%	16	20.0%	3	3.8%
TOTAL	933	100.0%	677	72.6%	52	5.6%	114	12.2%	68	7.3%	22	2.4%
80-99% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	1	0.2%	1	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	2	0.3%	1	50.0%	0		1	50.0%	0		0	
BLACK	6	1.0%	4	66.7%	0		0		1	16.7%	1	16.7%
HISPANIC	11	1.9%	11	100.0%	0		0		0		0	
WHITE	521	88.9%	419	80.4%	28	5.4%	39	7.5%	30	5.8%	5	1.0%
OTHER	4	0.7%	3	75.0%	1	25.0%	0		0		0	
JOINT (WHITE/MINORITY) ⁵	5	0.9%	5	100.0%	0		0		0		0	
RACE NOT AVAILABLE ⁶	36	6.1%	15	41.7%	5	13.9%	11	30.6%	5	13.9%	0	
TOTAL	586	100.0%	459	78.3%	34	5.8%	51	8.7%	36	6.1%	6	1.0%
100-119% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	1	0.2%	1	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	1	0.2%	1	100.0%	0		0		0		0	
BLACK	6	1.4%	5	83.3%	1	16.7%	0		0		0	
HISPANIC	3	0.7%	0		1	33.3%	2	66.7%	0		0	

MSA Professional Services, Inc.

ANALYSIS of IMPEDIMENTS to FAIR HOUSING
BELOIT, WISCONSIN
July 2004

AGGREGATE TABLE 5-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY HOMES, BY INCOME AND RACE OF APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
WHITE	373	88.2%	308	82.6%	16	4.3%	21	5.6%	22	5.9%	6	1.6%
OTHER	3	0.7%	1	33.3%	1	33.3%	1	33.3%	0		0	
JOINT (WHITE/MINORITY) ⁵	7	1.7%	7	100.0%	0		0		0		0	
RACE NOT AVAILABLE ⁶	29	6.9%	19	65.5%	2	6.9%	3	10.3%	5	17.2%	0	
TOTAL	423	100.0%	342	80.9%	21	5.0%	27	6.4%	27	6.4%	6	1.4%
120% OR MORE OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	1	0.1%	1	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	9	1.0%	8	88.9%	0		0		1	11.1%	0	
BLACK	3	0.3%	2	66.7%	0		0		1	33.3%	0	
HISPANIC	3	0.3%	3	100.0%	0		0		0		0	
WHITE	766	88.9%	647	84.5%	29	3.8%	33	4.3%	47	6.1%	10	1.3%
OTHER	4	0.5%	3	75.0%	0		1	25.0%	0		0	
JOINT (WHITE/MINORITY) ⁵	11	1.3%	10	90.9%	1	9.1%	0		0		0	
RACE NOT AVAILABLE ⁶	65	7.5%	42	64.6%	4	6.2%	9	13.8%	9	13.8%	1	1.5%
TOTAL	862	100.0%	716	83.1%	34	3.9%	43	5.0%	58	6.7%	11	1.3%
ALL INCOMES												
AMERICAN IND/ALASKAN NATIVE	5	0.2%	5	100.0%	0		0	0.0%	0		0	
ASIAN/PACIFIC ISLANDER	17	0.5%	14	82.4%	1	5.9%	1	5.9%	1	5.9%	0	
BLACK	29	0.9%	21	72.4%	2	6.9%	1	3.4%	4	13.8%	1	3.4%
HISPANIC	74	2.2%	55	74.3%	2	2.7%	15	20.3%	1	1.4%	1	1.4%
WHITE	2838	86.1%	2239	78.9%	132	4.7%	253	8.9%	169	6.0%	45	1.6%
OTHER	17	0.5%	12	70.6%	3	17.6%	2	11.8%	0		0	
JOINT (WHITE/MINORITY) ⁵	40	1.2%	31	77.5%	4	10.0%	4	10.0%	0		1	2.5%
RACE NOT AVAILABLE ⁶	275	8.3%	124	45.1%	17	6.2%	79	28.7%	43	15.6%	12	4.4%
TOTAL	3295	100.0%	2501	75.9%	161	4.9%	355	10.8%	218	6.6%	60	1.8%

AGGREGATE TABLE 5-3: DISPOSITION OF APPLICATIONS TO REFINANCE
LOANS ON 1 TO 4 FAMILY HOMES, BY INCOME AND RACE OF
APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4, 8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
LESS THAN 50% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	4	0.3%	4	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	6	0.5%	3	50.0%	0		2	33.3%	0		1	16.7%
BLACK	22	1.7%	16	72.7%	1	4.5%	5	22.7%	0		0	
HISPANIC	30	2.4%	16	53.3%	2	6.7%	10	33.3%	0		2	6.7%
WHITE	919	73.0%	656	71.4%	41	4.5%	152	16.5%	44	4.8%	26	2.8%
OTHER	6	0.5%	3	50.0%	1	16.7%	1	16.7%	0		1	16.7%
JOINT (WHITE/MINORITY) ⁵	8	0.6%	1	12.5%	0		6	75.0%	1	12.5%	0	
RACE NOT AVAILABLE ⁶	264	21.0%	45	17.0%	19	7.2%	135	51.1%	53	20.1%	12	4.5%
TOTAL	1259	100.0%	744	59.1%	64	5.1%	311	24.7%	98	7.8%	42	3.3%
50-79% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	6	0.2%	4	66.7%	0		1	16.7%	1	16.7%	0	
ASIAN/PACIFIC ISLANDER	7	0.3%	3	42.9%	1	14.3%	2	28.6%	1	14.3%	0	
BLACK	40	1.5%	17	42.5%	4	10.0%	12	30.0%	6	15.0%	1	2.5%
HISPANIC	37	1.3%	20	54.1%	3	8.1%	10	27.0%	2	5.4%	2	5.4%
WHITE	2160	78.7%	1695	78.5%	95	4.4%	225	10.4%	88	4.1%	57	2.6%
OTHER	9	0.3%	5	55.6%	0		2	22.2%	1	11.1%	1	11.1%
JOINT (WHITE/MINORITY) ⁵	33	1.2%	19	57.6%	0		8	24.2%	1	3.0%	5	15.2%
RACE NOT AVAILABLE ⁶	452	16.5%	94	20.8%	31	6.9%	195	43.1%	119	26.3%	13	2.9%
TOTAL	2744	100.0%	1857	67.7%	134	4.9%	455	16.6%	219	8.0%	79	2.9%
80-99% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	0	0.0%	0		0		0		0		0	
ASIAN/PACIFIC ISLANDER	9	0.4%	7	77.8%	1	11.1%	1	11.1%	0		0	
BLACK	22	1.0%	15	68.2%	2	9.1%	2	9.1%	0		3	13.6%

MSA Professional Services, Inc.

ANALYSIS of IMPEDIMENTS to FAIR HOUSING
BELOIT, WISCONSIN
July 2004

AGGREGATE TABLE 5-3: DISPOSITION OF APPLICATIONS TO REFINANCE
LOANS ON 1 TO 4 FAMILY HOMES, BY INCOME AND RACE OF
APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4,8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
HISPANIC	16	0.7%	11	68.8%	2	12.5%	2	12.5%	0		1	6.3%
WHITE	1891	83.1%	1554	82.2%	87	4.6%	152	8.0%	73	3.9%	25	1.3%
OTHER	6	0.3%	4	66.7%	2	33.3%	0		0		0	
JOINT (WHITE/MINORITY) ⁵	26	1.1%	19	73.1%	0		2	7.7%	3	11.5%	2	7.7%
RACE NOT AVAILABLE ⁶	306	13.4%	80	26.1%	15	4.9%	122	39.9%	67	21.9%	22	7.2%
TOTAL	2276	100.0%	1690	74.3%	109	4.8%	281	12.3%	143	6.3%	53	2.3%
100-119% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	1	0.1%	1	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	5	0.3%	5	100.0%	0		0		0		0	
BLACK	16	0.8%	8	50.0%	2	12.5%	4	25.0%	2	12.5%	0	
HISPANIC	8	0.4%	7	87.5%	0		1	12.5%	0	0.0%	0	
WHITE	1594	84.3%	1321	82.9%	81	5.1%	105	6.6%	58	3.6%	29	1.8%
OTHER	3	0.2%	1	33.3%	0		1	33.3%	1	33.3%	0	
JOINT (WHITE/MINORITY) ⁵	11	0.6%	8	72.7%	2	18.2%	0		1	9.1%	0	
RACE NOT AVAILABLE ⁶	253	13.4%	78	30.8%	21	8.3%	92	36.4%	54	21.3%	8	3.2%
TOTAL	1891	100.0%	1429	75.6%	106	5.6%	203	10.7%	116	6.1%	37	2.0%
120% OR MORE OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	0.1%	2	100.0%	0		0		0		0	
ASIAN/PACIFIC ISLANDER	12	0.3%	9	75.0%	0		1	8.3%	1	8.3%	1	8.3%
BLACK	29	0.8%	19	65.5%	6	20.7%	2	6.9%	1	3.4%	1	3.4%
HISPANIC	16	0.4%	12	75.0%	2	12.5%	2	12.5%	0		0	
WHITE	3033	84.8%	2638	87.0%	120	4.0%	137	4.5%	99	3.3%	39	1.3%
OTHER	13	0.4%	8	61.5%	3	23.1%	0		1	7.7%	1	7.7%
JOINT (WHITE/MINORITY) ⁵	48	1.3%	34	70.8%	4	8.3%	4	8.3%	2	4.2%	4	8.3%
RACE NOT AVAILABLE ⁶	424	11.9%	155	36.6%	36	8.5%	120	28.3%	94	22.2%	19	4.5%

MSA Professional Services, Inc.

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AGGREGATE TABLE 5-3: DISPOSITION OF APPLICATIONS TO REFINANCE
LOANS ON 1 TO 4 FAMILY HOMES, BY INCOME AND RACE OF
APPLICANT, 2002

MSA:3620-JANESVILLE-BELOIT, WI

Income and Race ^{4, 8}	Apps. Received ¹⁴	Percent of Category	Loans Originated	Percent by Race	Apps. Approved But Not Accepted	Percent by Race	Apps. Denied	Percent by Race	Apps. Withdrawn	Percent by Race	Files Closed as Incomplete	Percent by Race
TOTAL	3577	100.0%	2877	80.4%	171	4.8%	266	7.4%	198	5.5%	65	1.8%
ALL INCOMES												
AMERICAN IND/ALASKAN NATIVE	13	0.1%	11	84.6%	0		1	7.7%	1	7.7%	0	
ASIAN/PACIFIC ISLANDER	39	0.3%	27	69.2%	2	5.1%	6	15.4%	2	5.1%	2	5.1%
BLACK	129	1.1%	75	58.1%	15	11.6%	25	19.4%	9	7.0%	5	3.9%
HISPANIC	107	0.9%	66	61.7%	9	8.4%	25	23.4%	2	1.9%	5	4.7%
WHITE	9597	81.7%	7864	81.9%	424	4.4%	771	8.0%	362	3.8%	176	1.8%
OTHER	37	0.3%	21	56.8%	6	16.2%	4	10.8%	3	8.1%	3	8.1%
JOINT (WHITE/MINORITY) ⁵	126	1.1%	81	64.3%	6	4.8%	20	15.9%	8	6.3%	11	8.7%
RACE NOT AVAILABLE ⁶	1699	14.5%	452	26.6%	122	7.2%	664	39.1%	387	22.8%	74	4.4%
TOTAL	11747	100.0%	8597	73.2%	584	5.0%	1516	12.9%	774	6.6%	276	2.3%