

July 10, 2019

# Greenwood, Indiana

2019 - 2023 Analysis of Impediments to Fair Housing – Draft



## Table of Contents

I: Introduction, Page 1

II: Community Profile, Page 5

III: Housing Profile, Page 18

IV: Land Use Profile, Page 26

V: Compliance Data, Page 32

VI: Community Input, Page 35

VII: Fair Housing Impediments, Recommendations and Action Plan, Page 36

Appendix A: Consultations and Stakeholder Meetings – ***Final Draft Only***

## I: Introduction

In 1872, Samuel Greenwood recorded the plat that would eventually become incorporated as the City of Greenwood. This was not the beginning of settlement at this location, however; since 1825, a town here took the moniker of “Greenfield”, initiating a “naming” war with a nearby Hancock County community that still bears the name today. Before that time, a host of indigenous peoples, most recently the Delaware tribe, had called the community their home.

The City now finds itself in the position of being a “first-tier” suburban community, simultaneously grappling with growth on its edges but pondering redevelopment and community development needs in its older core areas. The local evolution of the community mirrors the growing regional diversity of Central Indiana, as Greenwood has had to adapt to its envelopment by an expanding Indianapolis metropolitan region.

Recently, the City has passed the threshold to be considered an “Entitlement” community under the U.S. Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG) Program, which provides redeveloping communities with supplemental federal resources intended to either benefit low-income persons and/or alleviate slums and blight. As a requirement of receiving these funds, the City has to take steps to assure that discriminatory actions, either explicit or implicit, that constrain the choices of people to procure adequate housing are being identified and mitigated. This new Analysis of Impediments (AI) to Fair Housing Choice document is but one step in this process.

The City of Greenwood is also required to complete a Consolidated Plan, an analysis of the housing and community development needs in the community, as well as a strategic plan outline goals to address the needs found. The City’s current Consolidated Plan covers the fiscal years 2019-2023, beginning October 1, 2019 and ending September 30, 2024. This AI will run in conjunction with the Consolidated Plan years. For the purpose of these documents, a fiscal year is defined as October 1 – September 30, mirroring the federal fiscal year.

### History of the Fair Housing Act

The Fair Housing Act, passed by the U.S. Congress in 1968, is an extension of the Civil Rights movement to protect certain classes of people from discrimination when trying to locate housing. HUD, through its Office of Fair Housing and Equal Opportunity, enforces the Act to prevent discrimination and intimidation of people in their homes, apartments and condominium complexes and in nearly all housing transactions related to the rental or sale of housing and provision of mortgage financing. The Act only exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker and housing operated by organizations and private clubs that limit occupancy to members (US Department of Housing and Urban Development). The protected classes in the Act include race, color, religion sex, disability, familial status and national origin. Income level is not a protected class in the Act, however, many of the protected classes do have a higher ratio of people with lower incomes, so this document will examine the location of households based on income, as well as the protected classes listed in the federal housing act.

The Act prevents the following activities based on race, color, religion, sex, disability, familial status or national origin:

- Refusal to rent or sell a property;
- Refusal to negotiate on housing;
- Refusal to make housing available;
- Denial of housing;
- Setting different terms, provisions or conditions for the sale or rental of the housing;
- Providing different housing services or facilities;
- Persuading a person to sell their home or rent their home by suggesting a certain race has moved into the community;
- Denial of a person access to membership or participation in an organization, facility or service on the basis or related to the sale or rental of housing;
- Refusal to provide a mortgage;
- Refusal to provide information on mortgages;
- Imposing different terms for mortgages;
- Appraising property differently;
- Refusal to purchase a loan or mortgage;
- Intimidation or interference with anyone exercising fair housing or assisting others with fair housing;
- Refusal to provide homeowners insurance;
- Providing different insurance rates or terms related to insurance;
- Refusal to provide all terms of homeowner's insurance or all information regarding available insurance;
- Making or printing any information regarding the sale or rental of housing, including mortgage and insurance information that indicates a preference or limitation to one of the protected classes.

### State of Indiana Fair Housing Acts

The primary enforcement agency for the State of Indiana is the Indiana Civil Rights Commission. The agency was established in 1961 as the Indiana Fair Employment Practices Commission. The agency lacked ability to enforce decisions or laws and had a limited scope. In 1963, the scope expanded to include civil rights and renamed the Indiana Civil Rights Commission (ICRC). The agency's ability to enforce laws, prosecute and make administrative decisions expanded at that time. The ICRC further expanded its jurisdiction in 1965 to include Housing.

In 1991, the State of Indiana General Assembly passed the Indiana Fair Housing Act. Enacting the Indiana Fair Housing Act and promulgating rules and regulations were part of a process that allowed the agency to be certified as a substantially equivalent fair housing enforcement agency with the U.S. Department of Housing and Urban Development (HUD). The Indiana Fair Housing law prohibits activities like blockbusting and discriminatory advertising, which have the effect of making it harder for a person to live in a neighborhood or individual housing unit of their choice. The Indiana Fair Housing Act is considered substantially equivalent to the federal Fair Housing Act.

### Fair Housing Provisions in the City of Greenwood

Title VI of the U.S. Civil Rights Act states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In order to ensure that local policies are consistent with Title VI, in 2016 the Greenwood Mayor issued an



Executive Order clarifying the City's Non-Discrimination Policy, which includes the following paragraph (emphasis in the original):

The City of Greenwood values each individual's civil rights and strives to provide equal opportunity and equitable service to all. As a recipient of federal funds, the City complies with Title VI and all related statutes, regulations, and directives which provide that ***no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the City on the grounds of race, color, age sex, sexual orientation, gender identify, disability, national origin, religion, income status, veteran status, limited English proficiency, or any other protected classification under federal law.*** The City further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.

The key assurances in the Executive Order have to do with complying with the U.S. Department of Transportation's implementing regulations, particularly with regards to contracting. A Title VI complaint and review process is described. The Executive Order refers people to their website for more information; however, as of the date of this writing (June 27, 2019), no link for the City's civil rights program exists. In summary, there does not appear to be a local ombudsman for hearing and referring fair housing complaints, and the City has not adopted any specific policies in this area.

### Research Methodology

City Consultants and Research, LLC (CCR) drafted the Analysis of Impediments to Fair Housing Choice on behalf of the City of Greenwood, Indiana. The Fair Housing Planning Guide, Volume 1 guided CCR to prepare this document. Our scope of work included:

1. Project Initiation: This included a meeting with City staff to begin the project. Meeting topics included communicating important stakeholders' contact information for consultation interviews, the review of previous actions taken and collected other relevant data.
2. Community Data Review: CCR conducted a community profile review using 2000 and 2010 U.S. Census information, the 2014 American Community Survey, data from the U.S. Bureau of Labor Statistics and the Indiana Business Research Center. Information was broken down into demographic information, income information and household type.
3. Housing Profile: CCR conducted a review of the housing market of the city of Indianapolis. Information and data were collected from the 2010 U.S. Census, the 20122017 American Community Survey, data from the National Low Income Housing Coalition and U.S. Department of Housing and Urban Development CHAS data sets, 2007-2011. CCR also examined reports analyzing Home Mortgage Disclosure Act (HMDA) data and foreclosure information to determine if any racial disparities occurred.
4. Compliance Profile: CCR examined legal documents such as zoning regulations, zoning variance procedures, fair housing education programs and reporting to determine if any legal structures exist that prohibit fair housing choice.
5. Survey and Community Input: CCR also conducted face-to-face interviews of stakeholders to determine the housing issues with greatest need as it pertains to fair housing choice. The survey and results are included in Section VI, below.

6. Self-Evaluation and Identification of Impediments: CCR reviewed all sections of the analysis to identify any impediments to fair housing choice. CCR also evaluated the progress made by the City of Indianapolis to address impediments identified in the previous AI reports.
7. Strategic Plan: CCR worked with local stakeholders to develop a strategic plan for addressing fair housing choice as part of the Consolidated Planning process. CCR worked to develop goals that would be realistic and achievable, based on the progress made from previous AI documents.

Several methodological issues, particularly pertaining to data collection, should be noted at this point:

- The City of Greenwood is an incorporated municipality located in Johnson County. Several categories of information, such as commuting data, are available only at the County level; these data are used where applicable, under the assumption that their general conclusions also apply to Greenwood specifically.
- Several other data categories are only available at the level of Census Block Groups and Census Tracts, which are small area classifications used by the U.S. Census Bureau. These geographies do not exactly match up with the City's corporate boundaries; maps in this document using Block Groups and Tracts will display units that are within and in the immediate environs of the City. Analyses using Block Groups and Tracts will use those units that fall partially or completely within the City's corporate boundary.
- Typically, HUD makes data available in special tabulations for Entitlement communities. Because of Greenwood's relatively new entitlement status, these tabulations were not yet available for this document. CCR has made every attempt to derive responsible estimates for crucial data that was not otherwise provided.

### Fair Housing Assessment

The U.S. Department of Housing and Urban Development (HUD) has released a new rule to change the format of fair housing analysis documents. This new rule was published on July 16, 2015. The new format will provide data and tools to state and local governments receiving HUD funding to assess the state of fair housing and set locally determined goals and priorities. This includes providing open data to HUD grantees and the public on patterns of integration and segregation, racially and ethnically concentrated areas of poverty, disproportionate housing needs and disparities in access to opportunity such as quality schools, transportation and other public amenities. This new assessment will be required of all Cities upon implementation of their next Consolidated Plan after October 31, 2020.

### Acknowledgements

City Consultants and Research, LLC would like to thank the many people who helped complete this document. Amy Nelson with the Fair Housing Center of Central Indiana for information about fair housing testing, state laws regarding fair housing and issues facing the community. A complete list of the key personnel interviewed for this document are listed within Appendix B of the final draft, many of which helped with research and identified useful reports on fair housing issues.

## II: Community Profile

This section of the AI analyzes the demographic makeup of the City of Greenwood and illustrates the socioeconomic geography to create a background for analysis of the housing and lending profiles that follow in this report. At this time the most comprehensive data set available is the 2012-2017 American Community Survey (ACS), which will serve as the primary source and basis for this statistical study, unless otherwise noted. It should be recognized, however, that these figures represent the demographics of two years ago. Because the City continues to grow, the trends noted in this report may indicate a direction and rate of change, but may also under-represent the current conditions.

“Figure 1: Base Map” (below) shows the City and its immediate surroundings. Greenwood is a community of 26.9 square miles (17,229 acres) abutting the southern boundary of the City of Indianapolis-Marion County. It occupies all or part of the Townships of Clark, Pleasant, and White River in Johnson County.

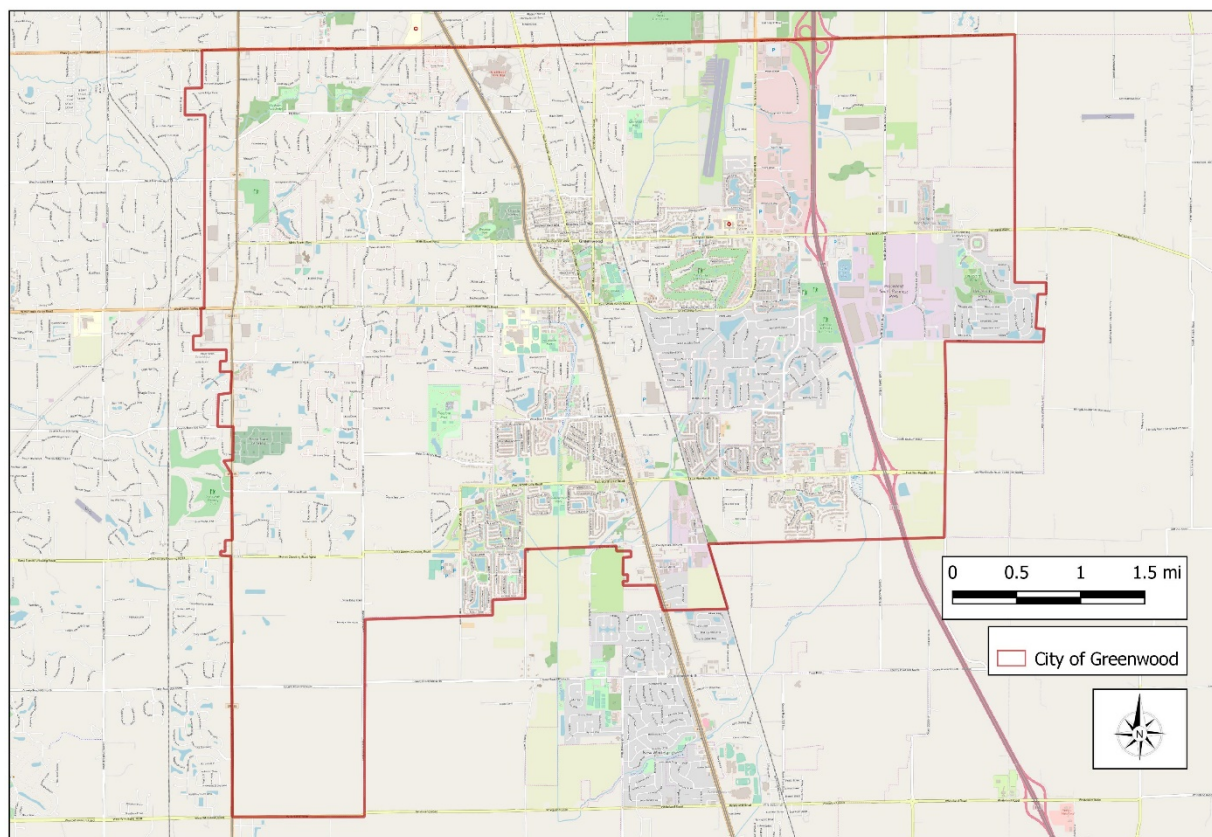


Figure 1: Base Map

“Figure 2: Regional Context” shows the relative size and location of Greenwood within the Indianapolis metropolitan region. Situated as the northernmost incorporated municipality in the southern three counties (Johnson, Morgan, and Shelby), Greenwood has ready access to I-65, with relatively short travel times to the other major Interstate corridors (I-69, I-70, I-74, and I-465). North-south mobility is quite good, thanks to both I-65 and US 31, and commuters can be in Downtown Indianapolis in under 20



minutes under most travel conditions. SR37/I-69 and SR 135 provide supplemental means of north-south access.

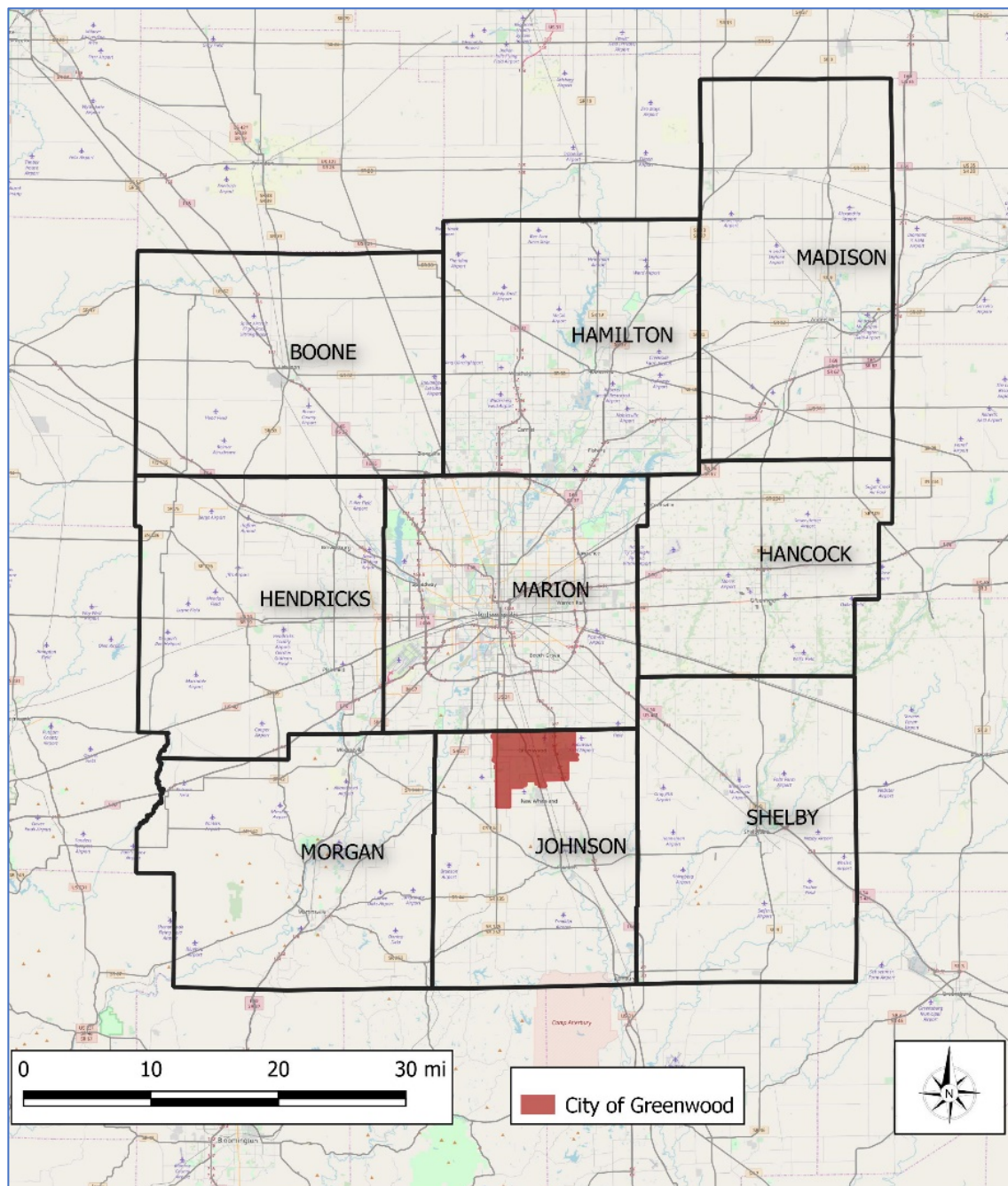
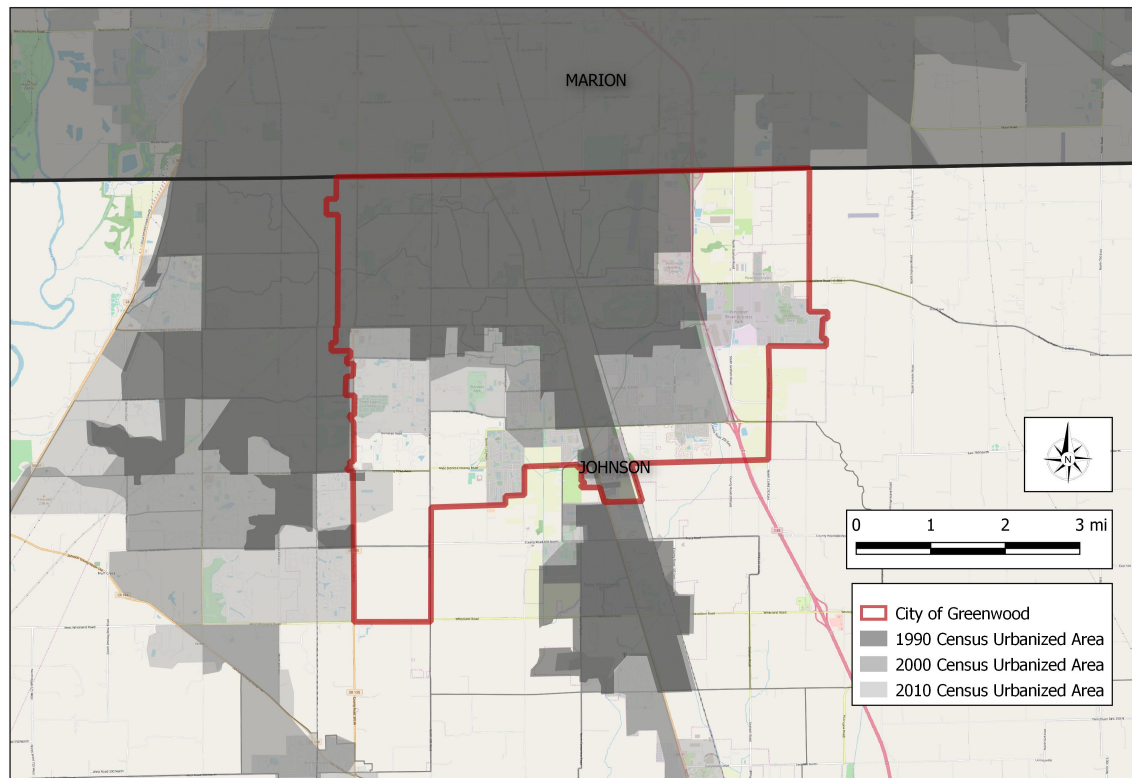


Figure 2: Regional Context

Due to its abutment of Indianapolis, Greenwood was significantly impacted when suburbanization started to spill over Marion County's boundaries in the 1980's. "Figure 3: Growth of the Indianapolis Urbanized Area" shows the expansion of the Census urbanized area, based upon residential density, for the successive Census years of 1990, 2000, and 2010. Even by 1990, a significant section of the City was

considered “urban,” primarily extending north-south along US 31, continuing south to Whiteland and SR 135, and east west along Main Street and County Line Road. By 2000, the urban area had spread further south along SR 135, into the neighboring community of Bargersville and US 31. The development had now enveloped the City of Franklin, the Johnson County seat. The 2010 urban area expands the development fringe further around these communities.



*Figure 3: Growth of the Indianapolis Urbanized Area*

In summary, Greenwood has an interesting mix of older urban areas and newly suburbanizing neighborhoods. The City’s proximity to Indianapolis has produced a unique configuration of development. In most cities, the older sections are centrally located, but in Greenwood, the older areas, along with higher concentrations of older housing units, occupy the north end and central spine (US 31) of the City.

Greenwood's most recent (2017) population estimate is 55,459 people. The population trend over time is shown in “

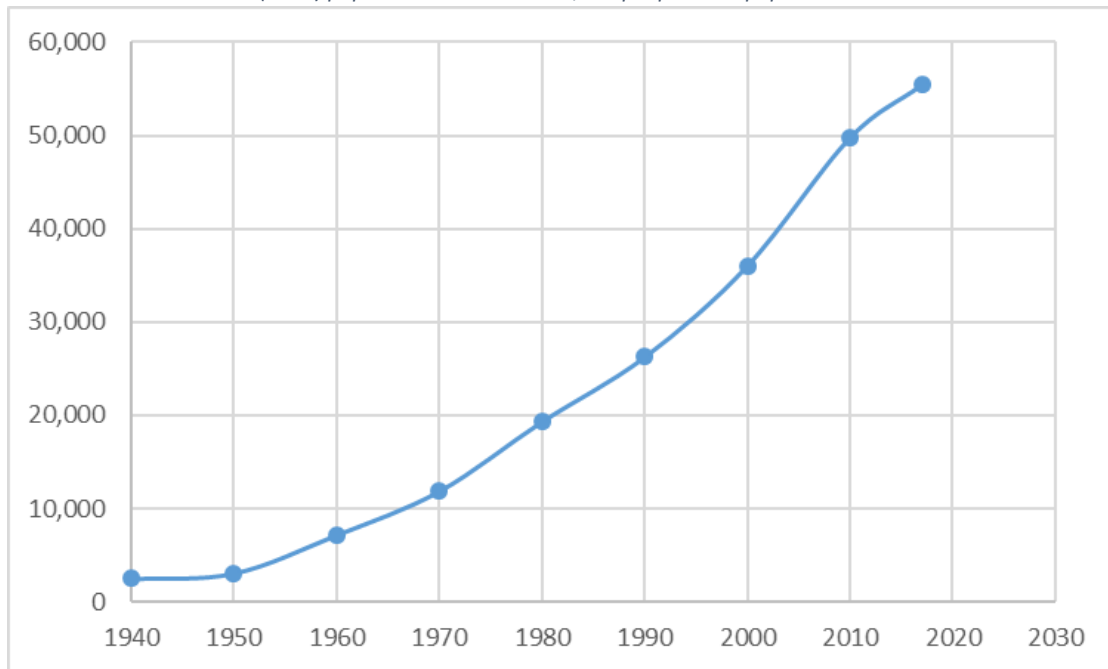


Figure 4: Greenwood Historical Population Growth.”

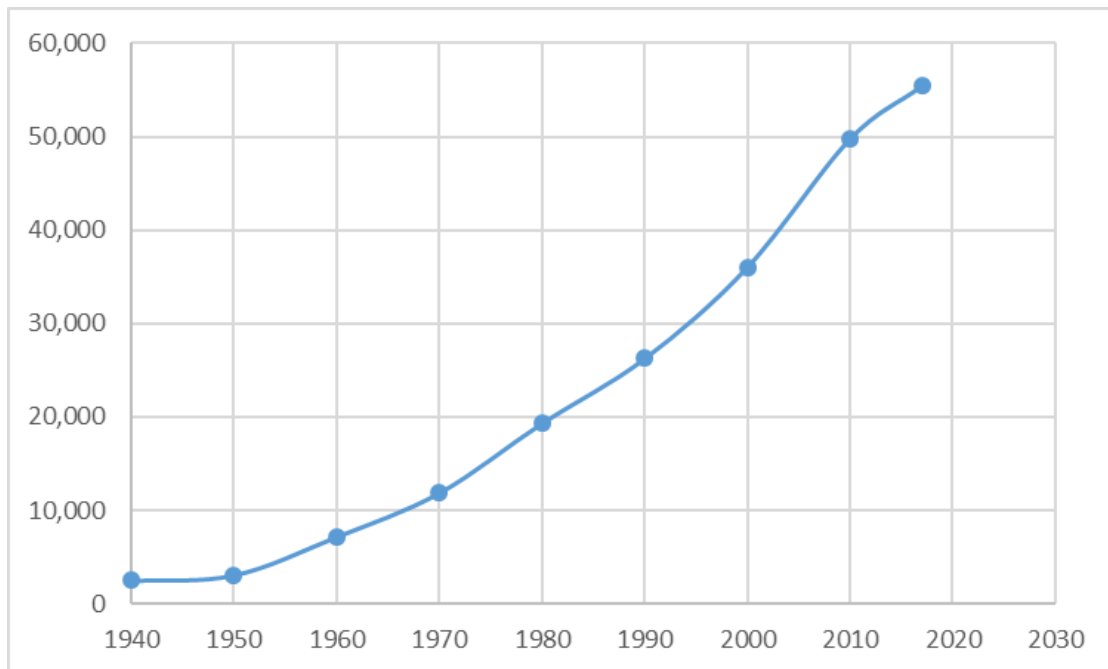


Figure 4: Greenwood Historical Population Growth

## Race

“

Figure 5: Racial Makeup of Greenwood” shows the proportion of races represented in the City. The majority (47,803 people, or 86%) of residents are Caucasian, followed by Asian (3,136 people, or 6%) and African-American (2,444 people, or 4%). Native Americans number 217 persons (0.4%), and Polynesians number 16 (0.01%). There are 630 people (1%) with multiple racial backgrounds.

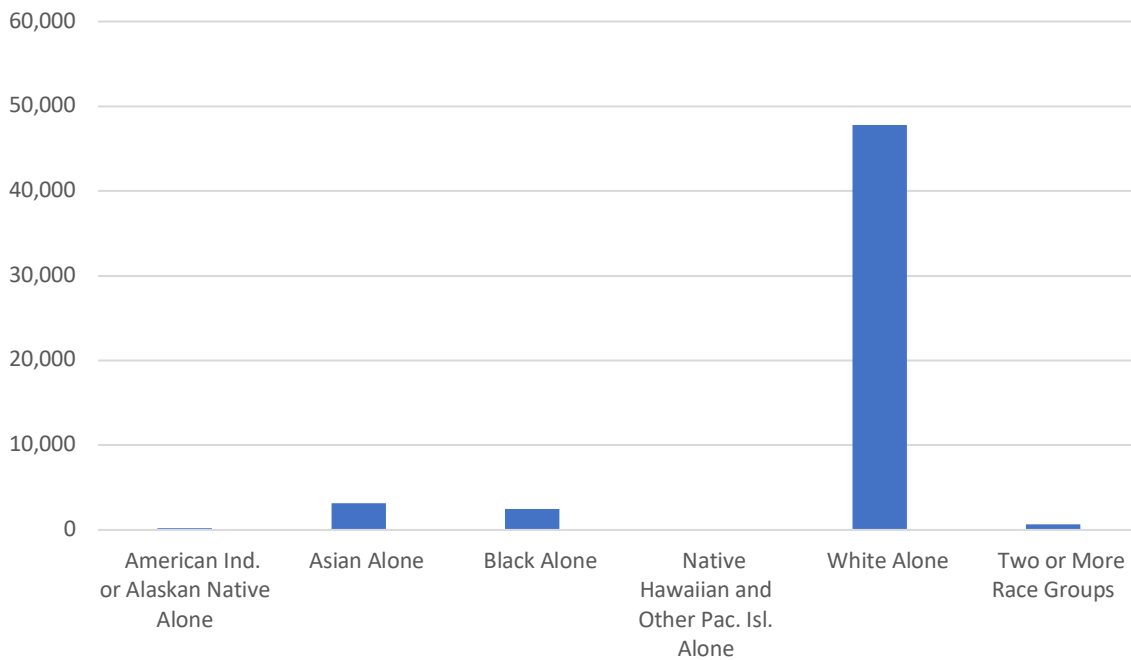


Figure 5: Racial Makeup of Greenwood

“Figure 6: Population and Race” shows the racial distribution of the population within the City. It should be noted that “Other Race” consists almost exclusively of Asians. Comparing this figure to the City’s historical development to Figure 3: Growth of the Indianapolis Urbanized Area, on page 8, most of the minority populations are clustered in the older areas of the City.

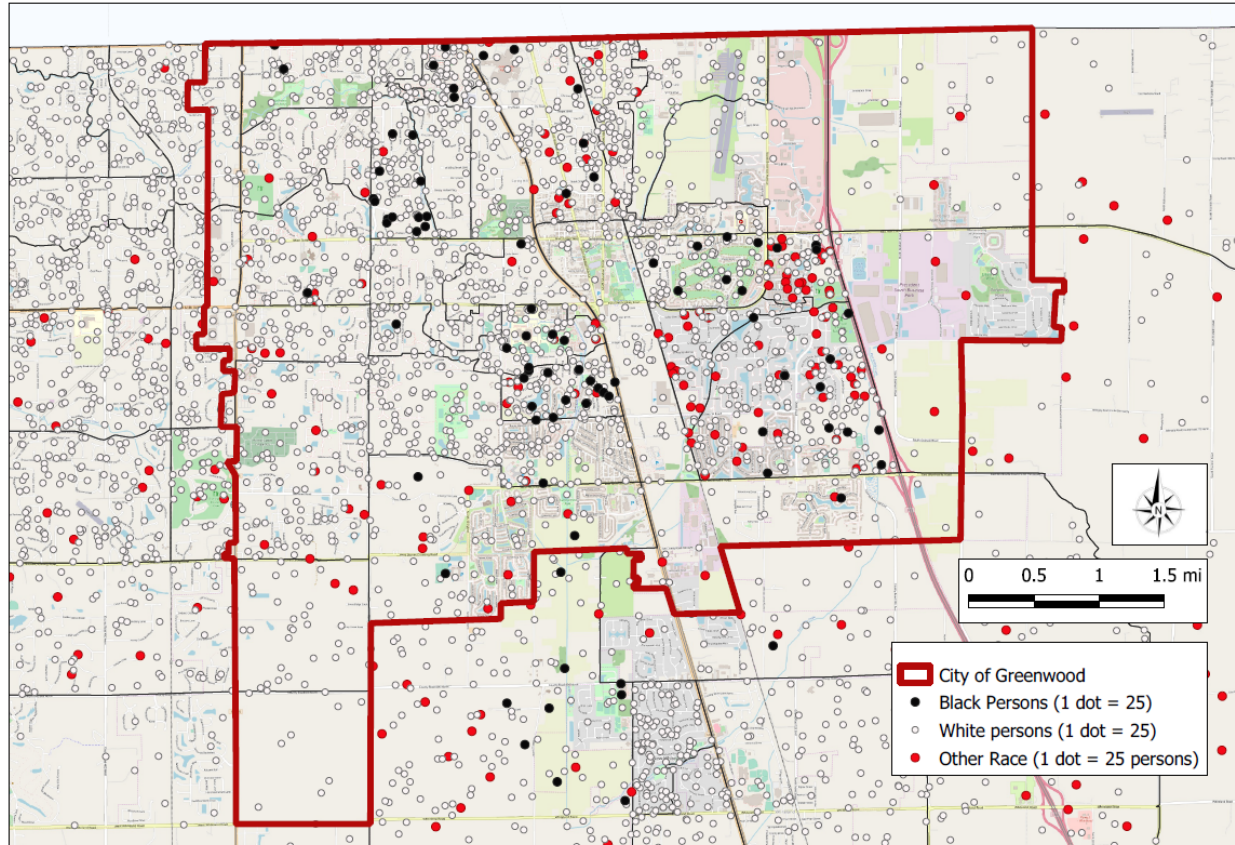


Figure 6: Population and Race



## Ethnicity

Hispanic is an ethnicity category measured by the U.S. Census Bureau, not a racial group. A person who identifies himself or herself as Hispanic must also identify themselves as a race, which may be White, African American or another racial category. As of 2017, 3,401 Greenwood residents (6%) identify themselves as Hispanic. “Figure 7: Hispanic Populations” shows the location of Hispanic residents relative to low-income populations.

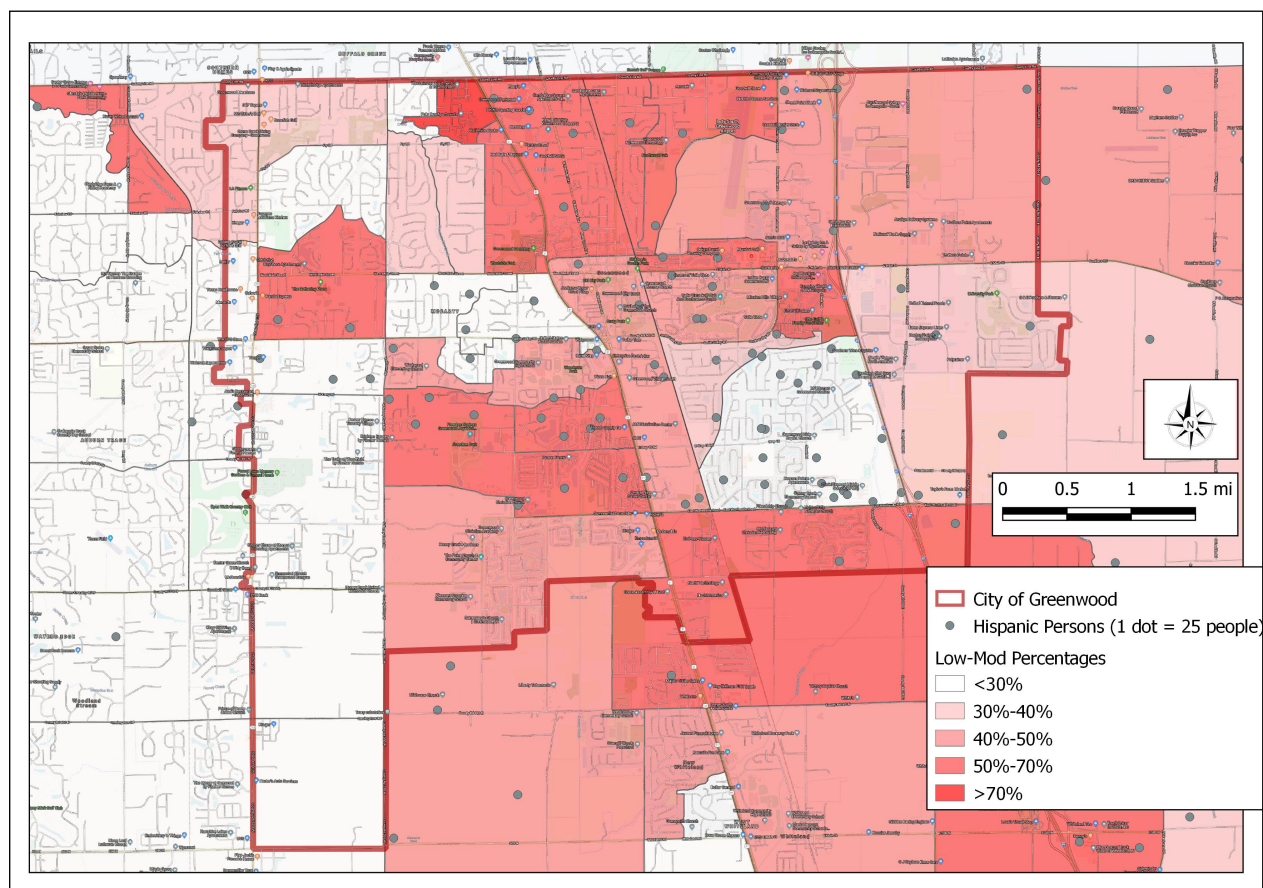


Figure 7: Hispanic Populations

## Income

“Figure 8: Low- to Moderate-Income Areas”, below, shows the relative concentrations of households that are considered low-income (below 50% of the area median) or moderate-income (below 80% of the area median). Note that the boundaries of the Census Block Groups can lead to misleading impressions, particularly on the southeastern developing fringe of the community. There, as with the other low-mod concentrations, a tendency towards the older urban areas of Greenwood is evident.

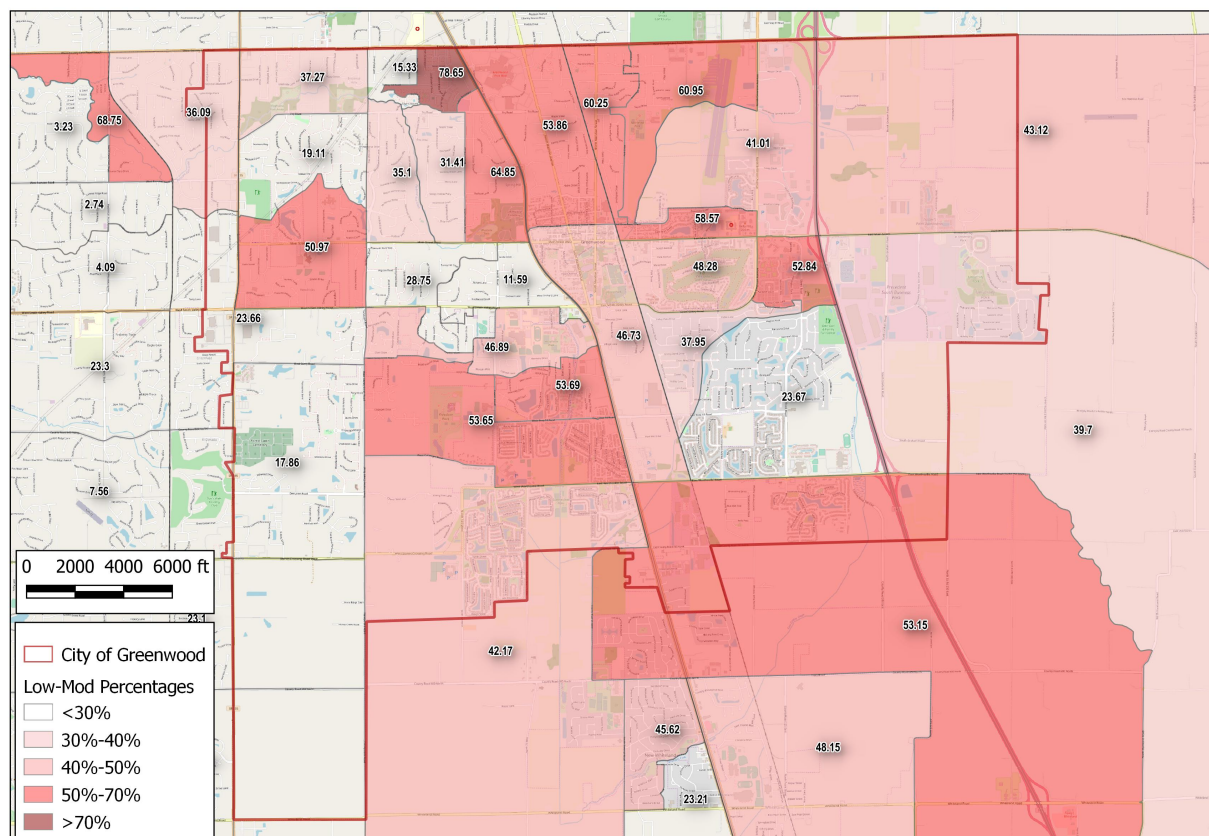


Figure 8: Low- to Moderate-Income Areas

## Household Characteristics

“Figure 9: Female Heads of Household by Low-Mod Areas” shows the location of households with a sole female head, and contrasts that information to the location of low- to moderate-income areas in the community. There appears to be a slight relationship between the two variables.

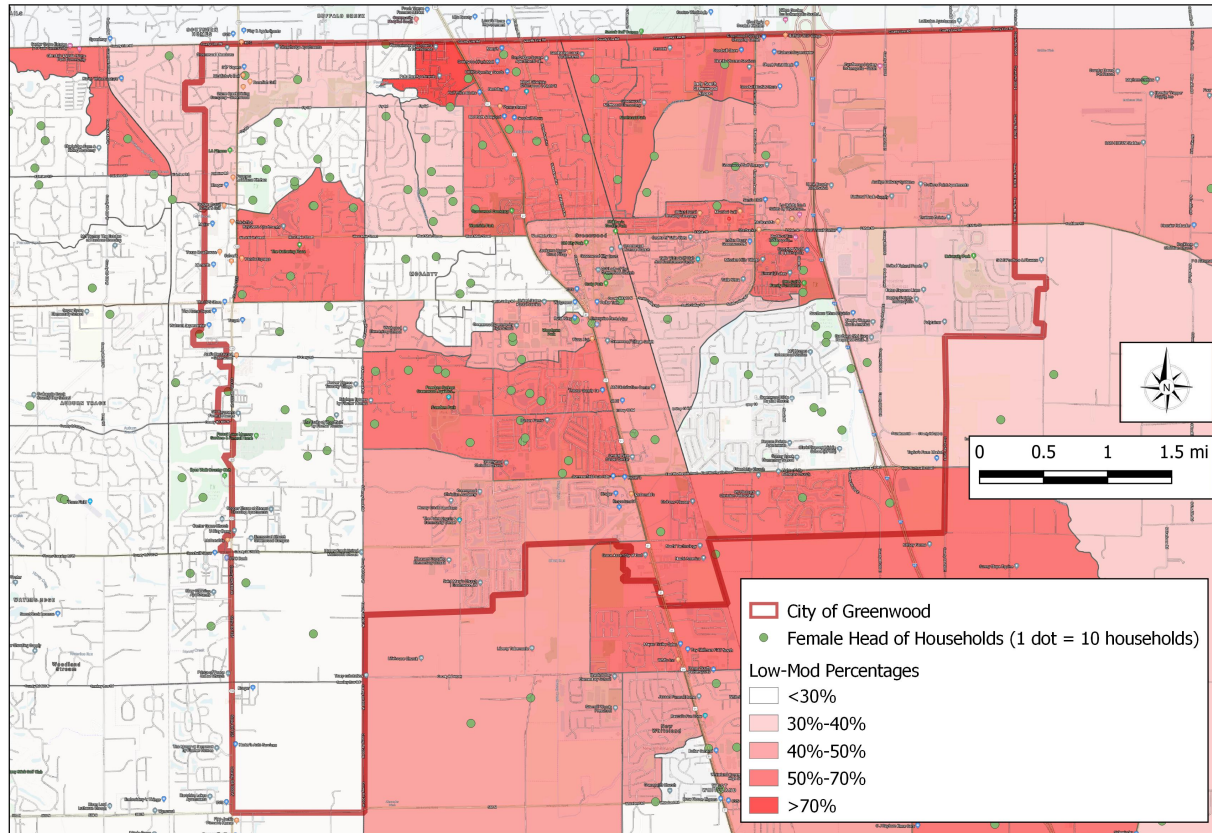


Figure 9: Female Heads of Household by Low-Mod Areas



“Figure 10: Hearing and Sight Difficulties shows the location of persons who have those particular disabilities, and contrasts the information to the location of low- to moderate-income areas. There does not appear to be relationship between the two.

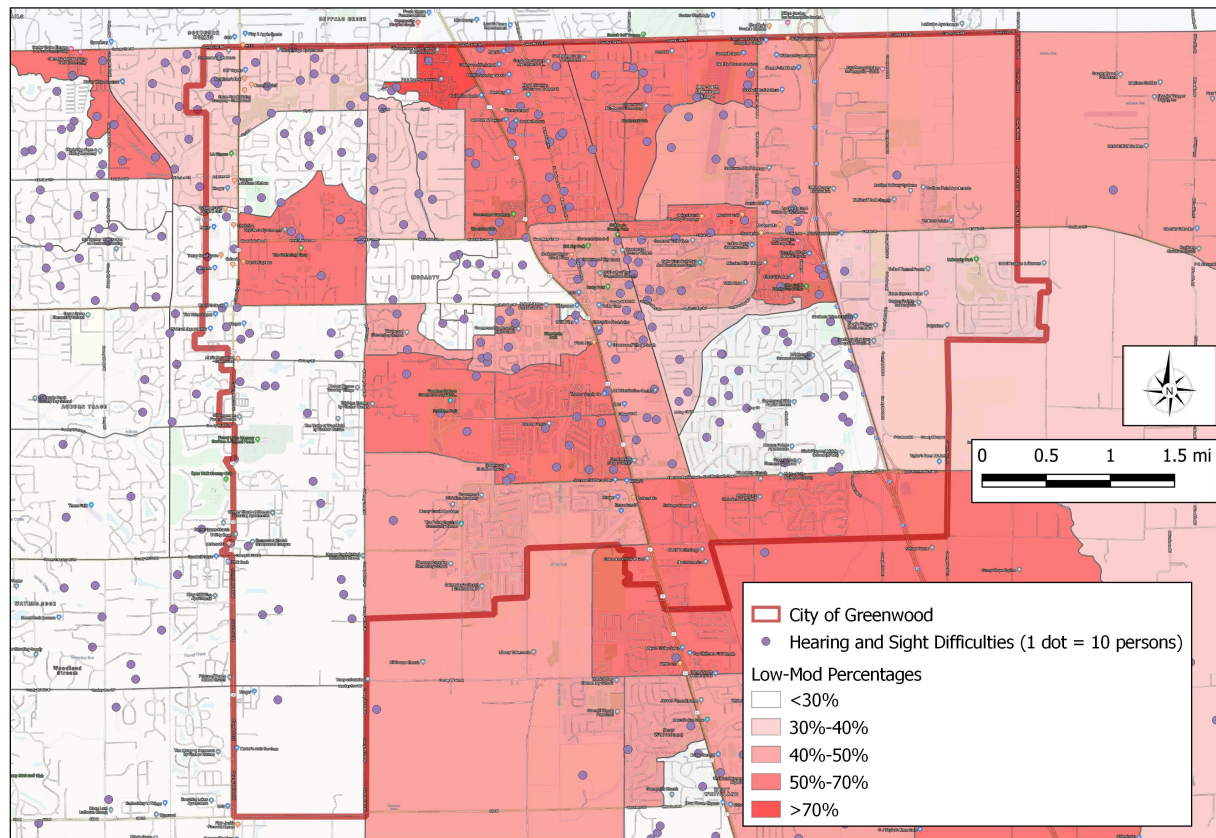


Figure 10: Hearing and Sight Difficulties

“Figure 11: Group Quarters Population” shows the location of the population living in group quarters, including group homes, retirement facilities, and the like. There appears to be a strong relationship between the location of group quarters residents with low- to moderate-income areas.

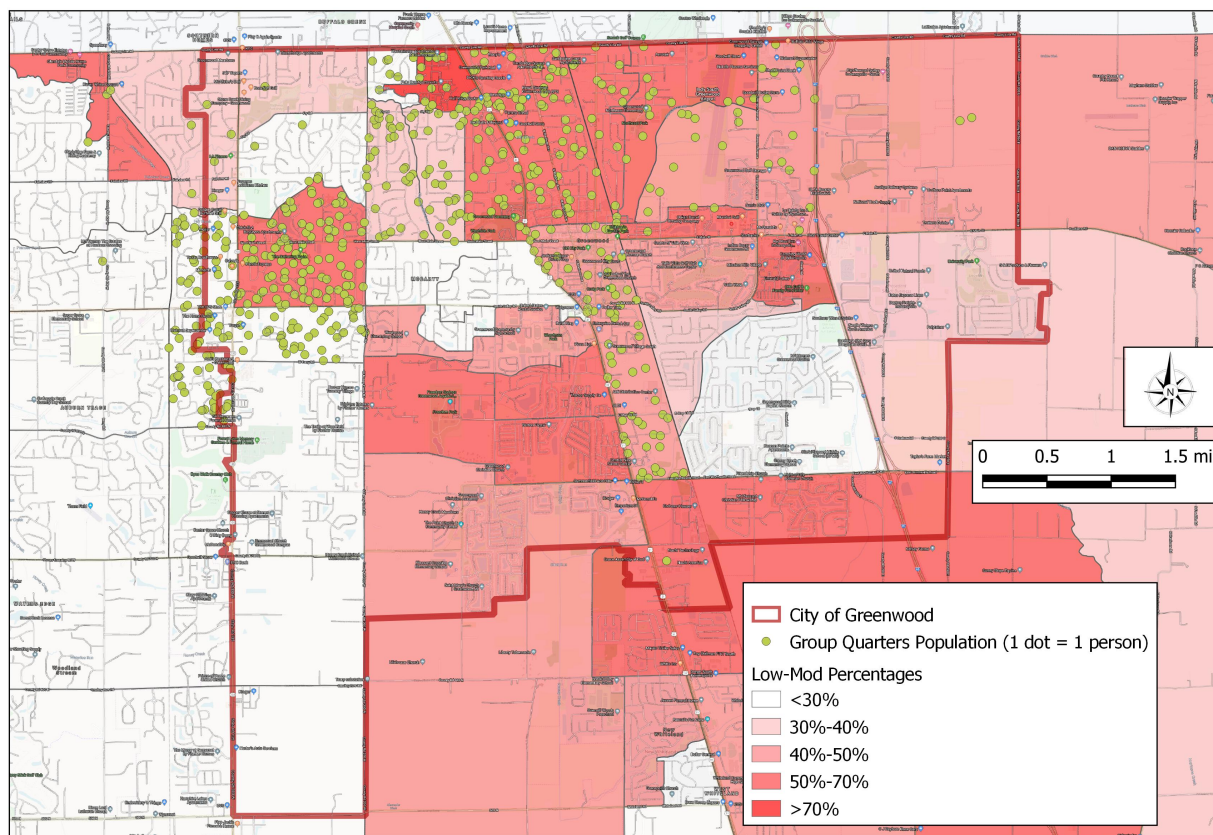


Figure 11: Group Quarters Population

## Economic Status and Income Distribution

Ball State University Center for Business and Economic Research published an economic document called the Indiana Economic Outlook 2014. The document looks at the national and state economic recoveries as well as that of Central Indiana. The introduction to this document includes the following statement:

Central Indiana (roughly the greater Indianapolis region) is comprised of Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby counties. The region is home to more than 1.76 million persons with a per capita income of \$40,027. Nearly one in three employed Hoosiers work in the region, totaling more than 1.1 million jobs. Since the end of the Great Recession, the region has seen strong population growth of 2.14 percent, per capita income growth of more than 8 percent, and employment growth of 1.8 percent. These are remarkably robust growth conditions, which mark the region as one of the more resilient and growing metropolitan areas in the nation.

## Employment and Commuting

“Figure 12: Major Employment Destinations for Johnson County Residents (courtesy of STATS Indiana)” shows where Johnson County residents work, including Greenwood residents. It is noteworthy that as many people work in Marion County as they do in Johnson County, which is consistent with the idea that Johnson County is a bedroom community. It can reasonably be expected that because it is the Johnson County municipality that is most proximate to Marion County, that the share of workers commuting to Marion County is even higher in the City of Greenwood than other Johnson County municipalities.

### Where Johnson County residents work

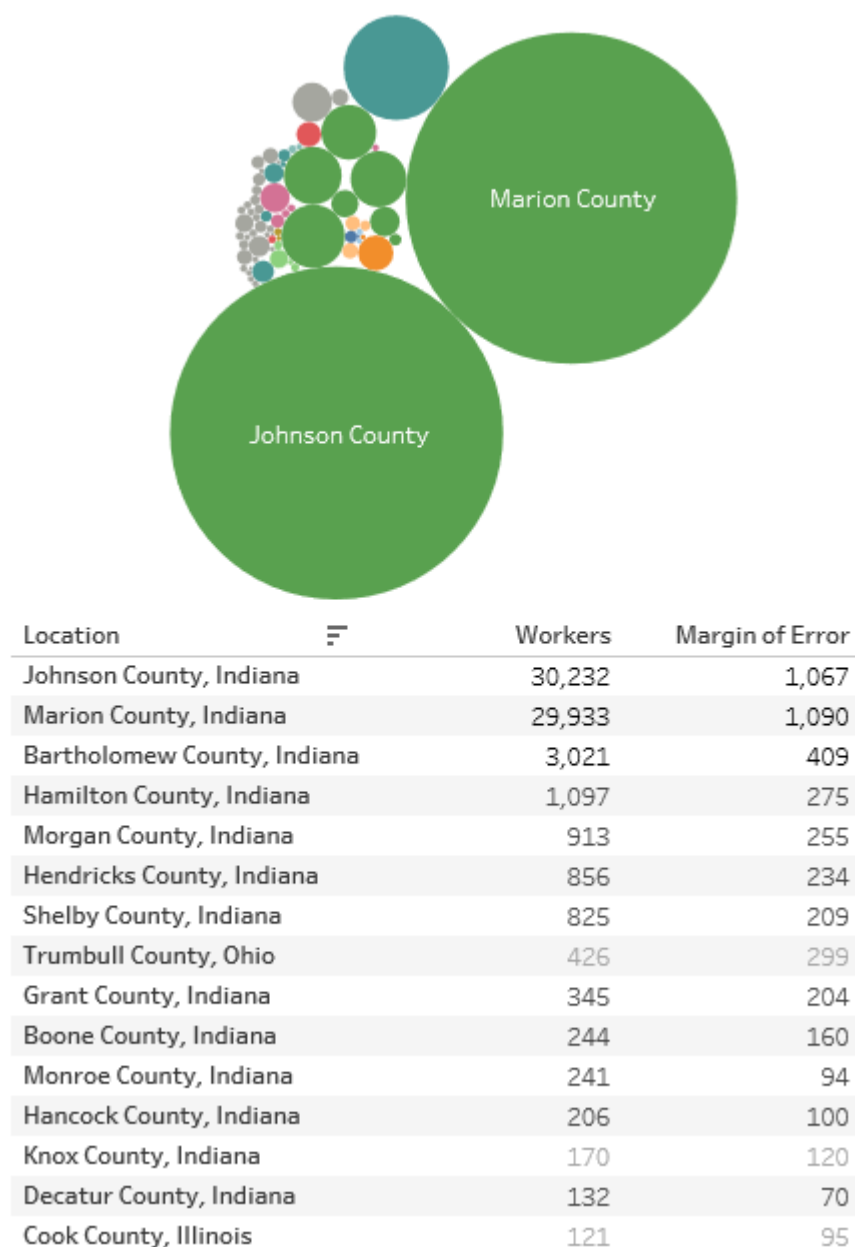


Figure 12: Major Employment Destinations for Johnson County Residents (courtesy of STATS Indiana)



## Median Household Income

“Figure 13: Median Income by Census Block Group” shows the 2017 median household income for the study area. Note the correspondence between lower household incomes with “Figure 8: Low- to Moderate-Income Areas” and areas outside of the City, particularly to the west, have median household incomes that are considerably higher than those found within the City. This finding reinforces the notion that the City of Greenwood performs a “central city” function within Johnson County, serving as a repository for households whose income and/or other needs, such as transportation, limit their household locational choices.

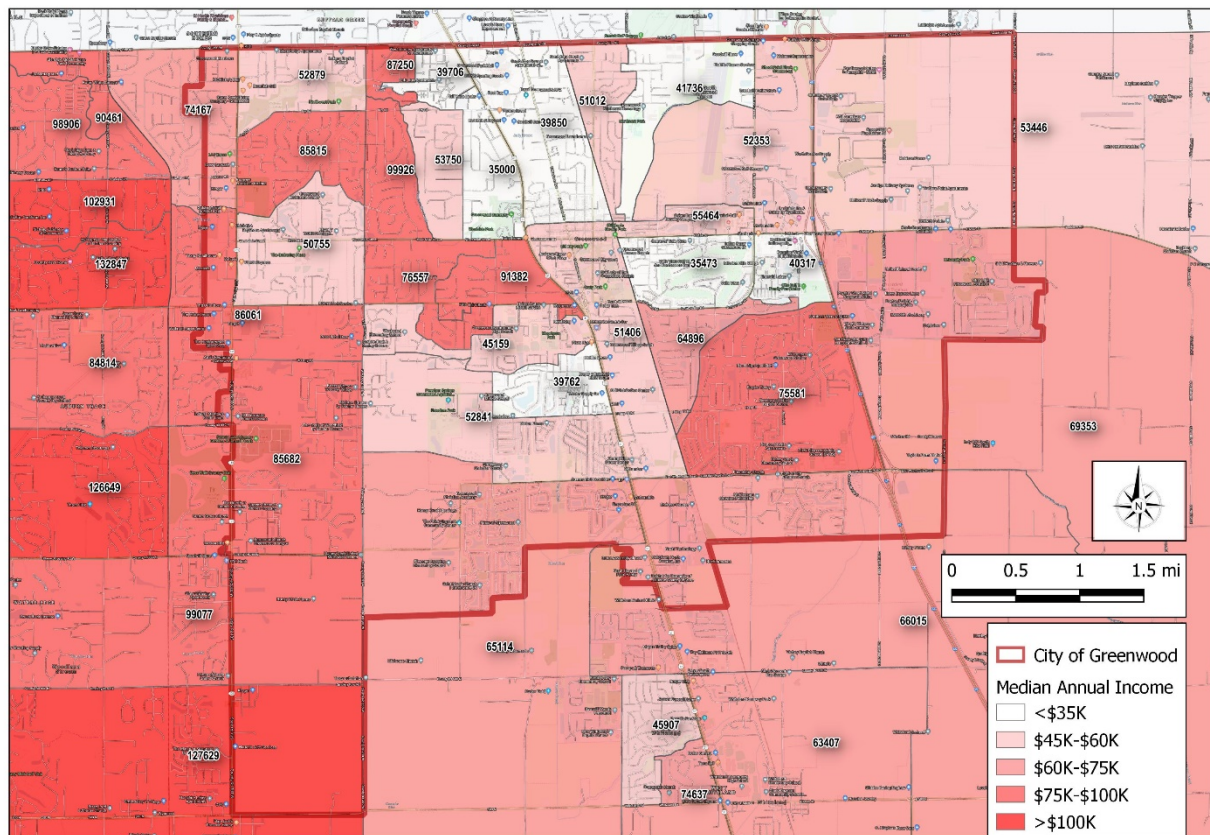


Figure 13: Median Income by Census Block Group

### III: Housing Profile

This section of the Analysis of Impediments to Fair Housing Choice (AI) analyzes the land use for the City of Greenwood and evaluates the public policies regarding land use and planning to determine the result in any impediments to fair housing choice.

As of the 2017 ACS, Greenwood had 23,458 housing units, broken into three categories, renter occupied, owner occupied, and vacant for seasonal/recreational use. “Figure 14: Tenure of Housing Units” shows the breakdown by these categories for the City of Greenwood.

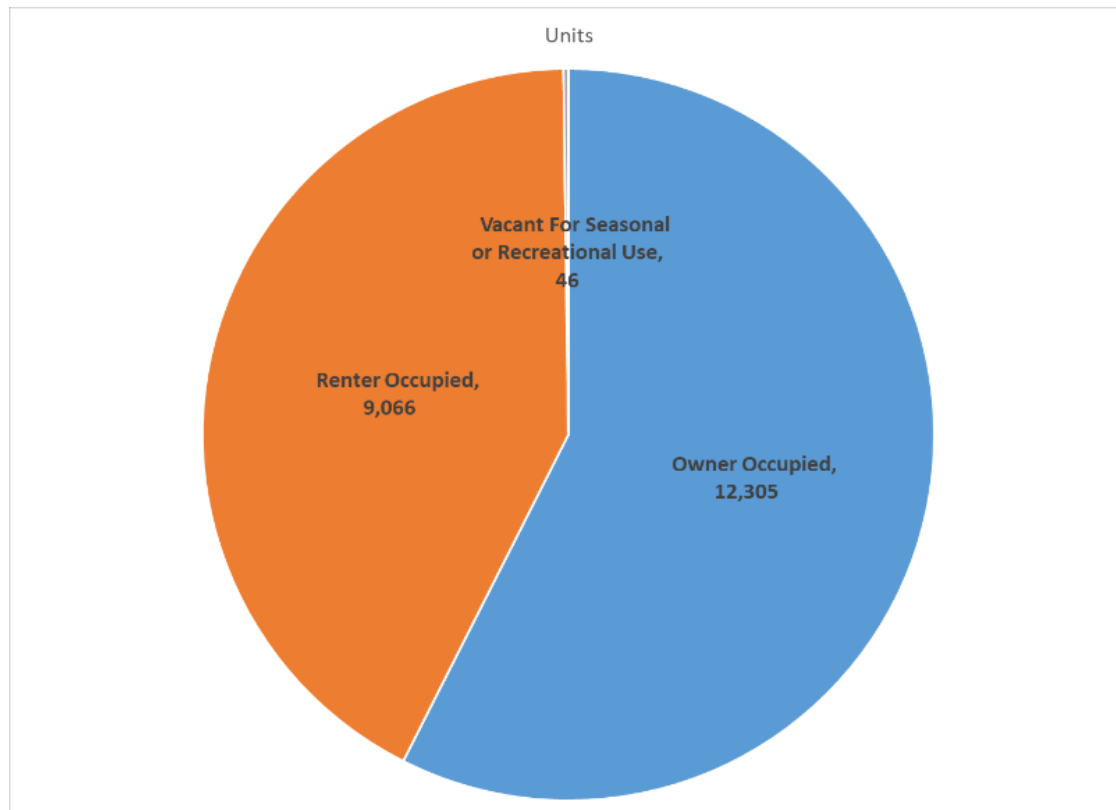


Figure 14: Tenure of Housing Units



“Figure 15: Housing Tenure and Vacancy” shows the distribution of units by tenure within the City. Renter-occupied units are more prevalent in the older and more dense areas of the City, yet there are some developing areas with high concentrations of rental units, particularly in the neighborhoods south of Smith Valley Road. Interestingly, many of these rental units are single-family.

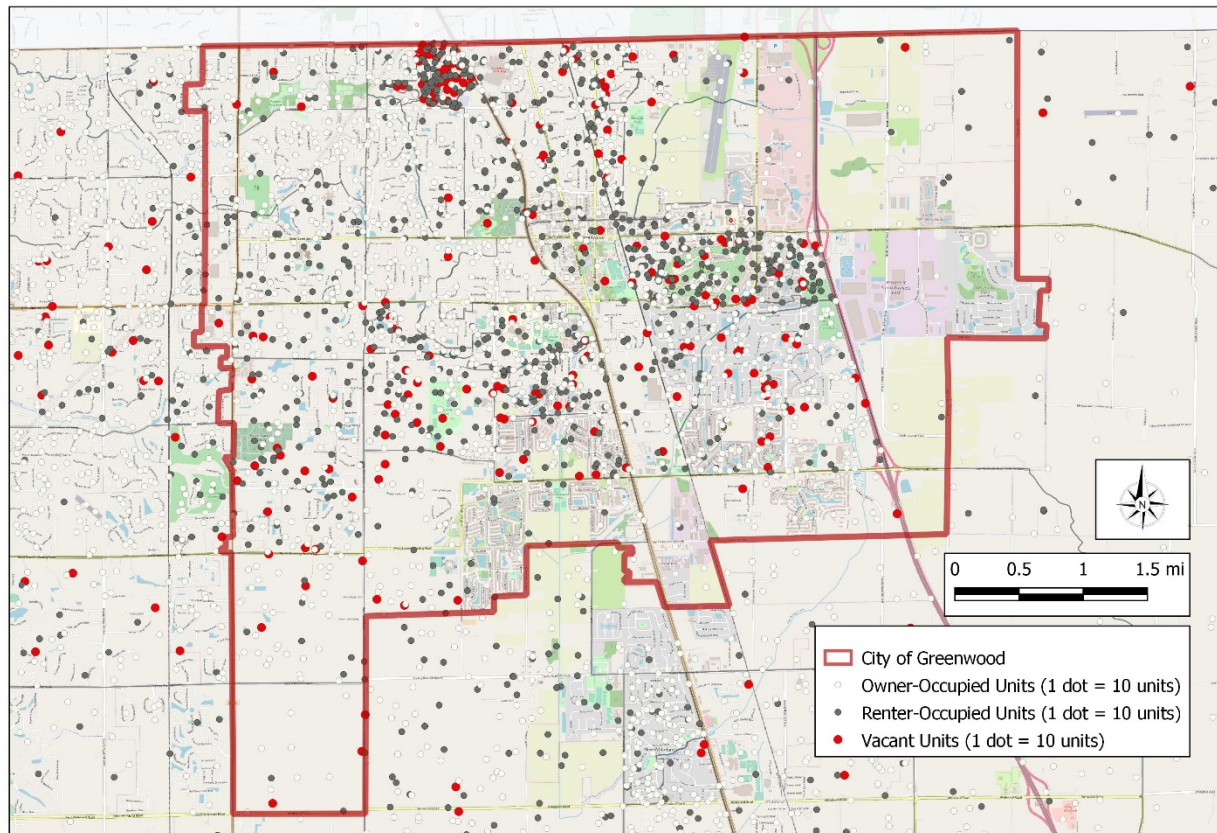


Figure 15: Housing Tenure and Vacancy

“Figure 16: Overcrowding and Severe Overcrowding” shows the incidence of overcrowding for units within Greenwood. For purposes of this analysis, “overcrowded” means between 1 and 1.5 persons per room, while “severe overcrowding” means more than 1.5 persons per room. Note that these areas generally correspond to low- to moderate income areas found in “Figure 8: Low- to Moderate-Income Areas” suggesting that families are responding to higher rents by “packing” larger households, or multiple households, into smaller units.

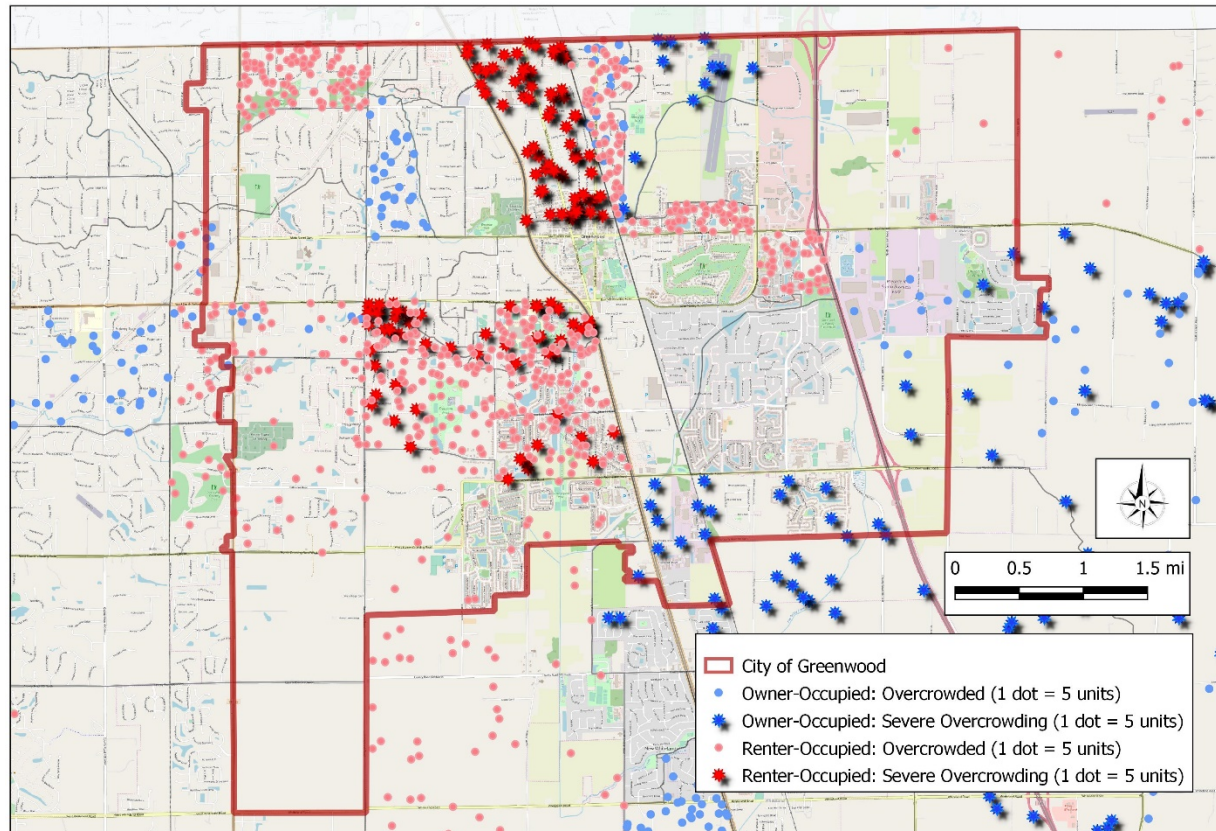


Figure 16: Overcrowding and Severe Overcrowding

“Figure 17: Inadequate Plumbing” shows the locations where plumbing facilities are incomplete or lacking, as a general indicator of substandard units. As is the case elsewhere in this document, we can see the relationship between the locations of these units and the older, predominately low- to moderate-income areas noted in Figure 8.

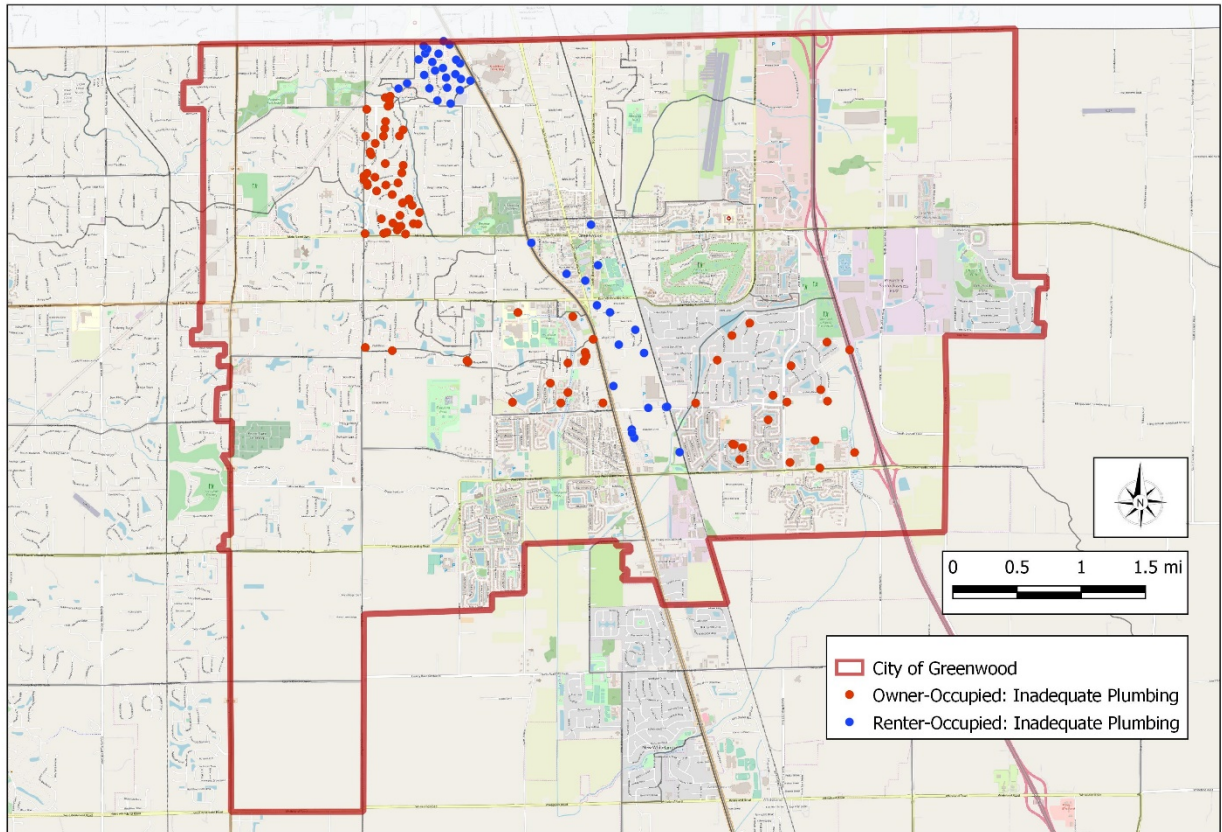


Figure 17: Inadequate Plumbing



“Figure 18: Median Rent” shows the median rent by Census Block Group. Surprisingly, the highest median rents, over \$1,800 per month, can be found towards the central part of the City, in older single-family neighborhoods.

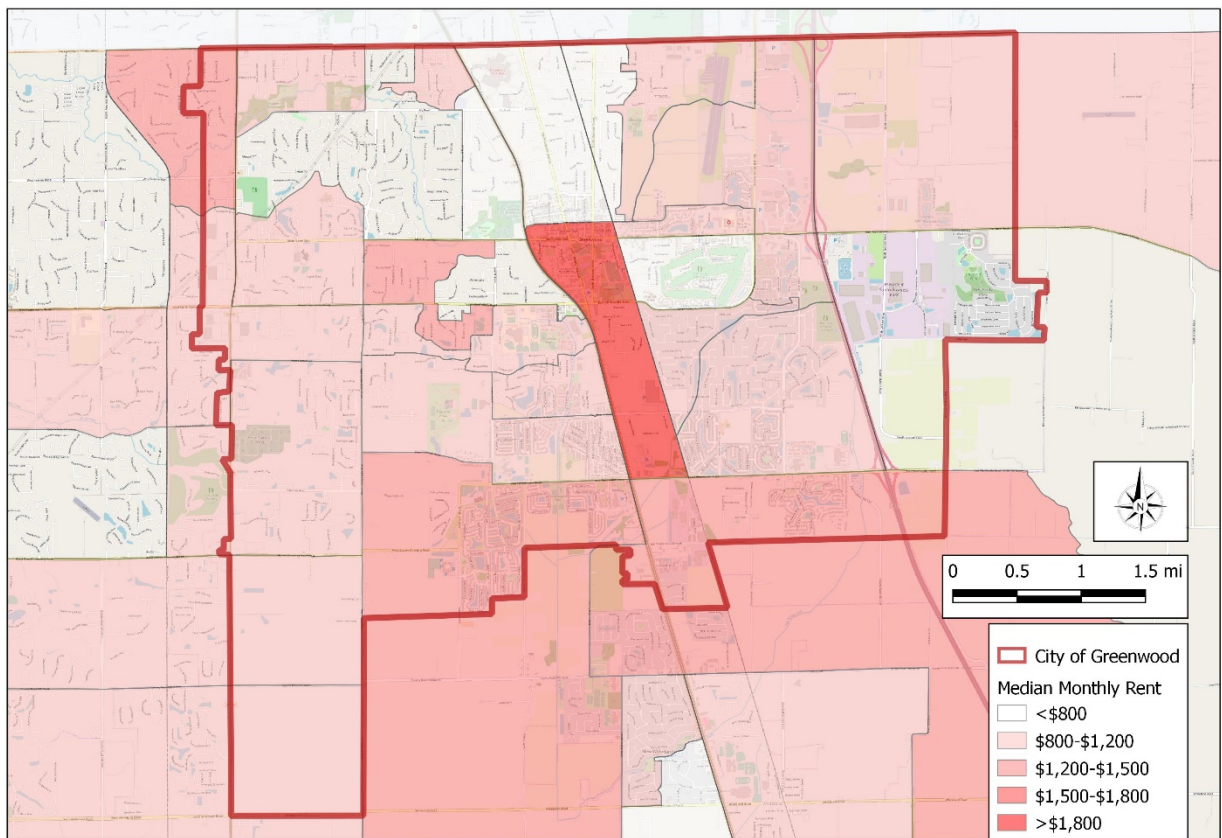


Figure 18: Median Rent

“Figure 19: Owner-Occupied Housing Cost Burden” shows the location of cost-burdened owner-occupied housing within the community. There appears to be a weak relationship between cost-burden and low- to moderate-income areas.

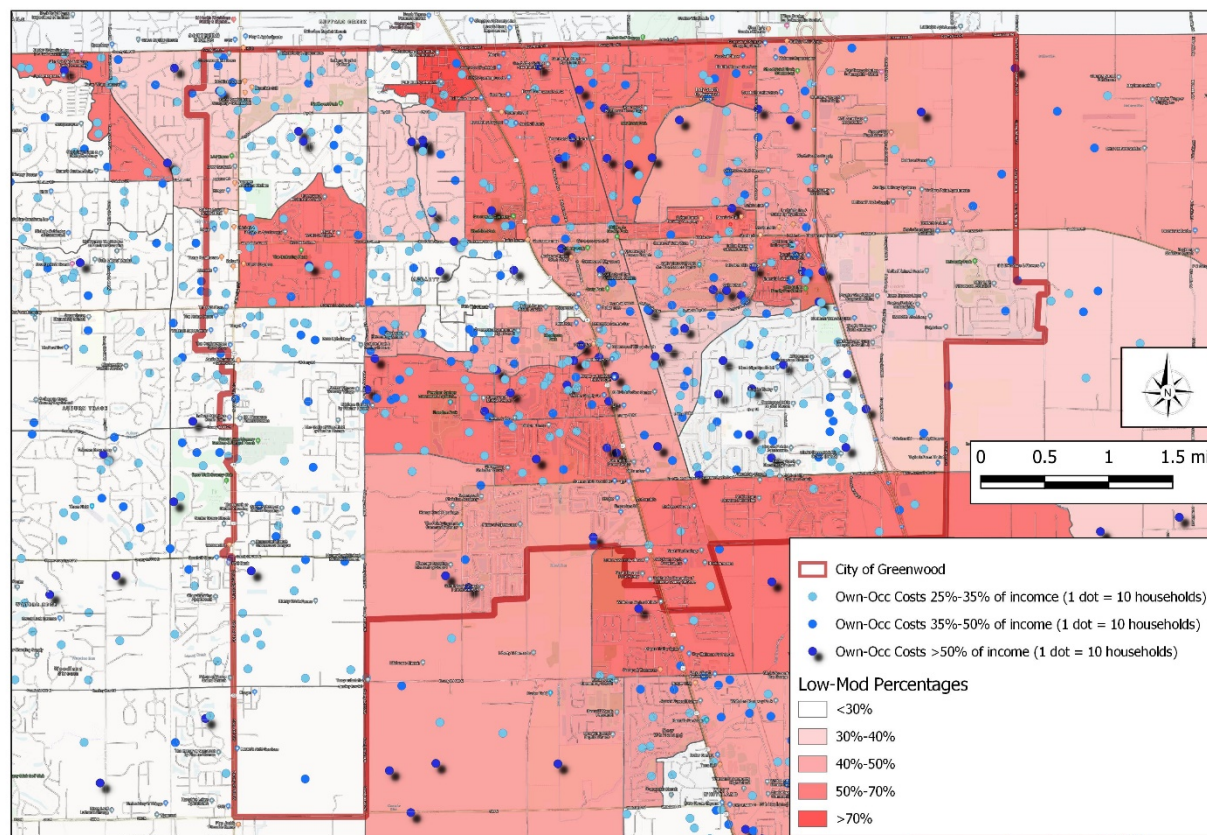


Figure 19: Owner-Occupied Housing Cost Burden

## Living Wage

Recent news and debate have taken place on the need to increase the minimum wage to a living wage. While there are two sides of the debate with many people on each side, it brings to light that the minimum wage is different from a living wage. The National Low Income Housing Coalition conducts an annual study called *Out of Reach*. *Out of Reach* documents the significant gap between renters' wages and the cost of rental housing across the United States. A brief look at the *Out of Reach* Study for 2019 from the National Low Income Housing Coalition states the mean renter's wage in Johnson County is \$11.52 per hour and would require the renter to work at least 61 hours per week to afford a 2 bedroom apartment. This is a much higher wage than the minimum wage of \$7.25 per hour. No rent levels are affordable to households earning a minimum wage in Johnson County. Even for an efficiency apartment, a household with a minimum wage will need to work at least 69 hours to afford the rent at fair market. To only work 40 hours per week and afford a two-bedroom apartment in the City of Greenwood, a worker must earn \$16.03 per hour. This is often referred to in the *Out of Reach* report as a living wage.

## HMDA Analysis

Information contained in the following tables comes from the online reports available from the Federal Financial Institutions Examination Council (FFIEC). The FFIEC is responsible for the collection and administration of the Home Mortgage Disclosure Act (HMDA) reporting data that financial institutions are required to submit. The most recent data available comes from the 2014 calendar year.

“Figure 20: HMDA Denial Analysis”, below, overlays the same minority categories used in “Figure 6: Population and Race”, above, on the number of loan denials per 1,000 people. There does not appear to be a spatial correlation between the number of loan denials and high concentrations of minority populations.

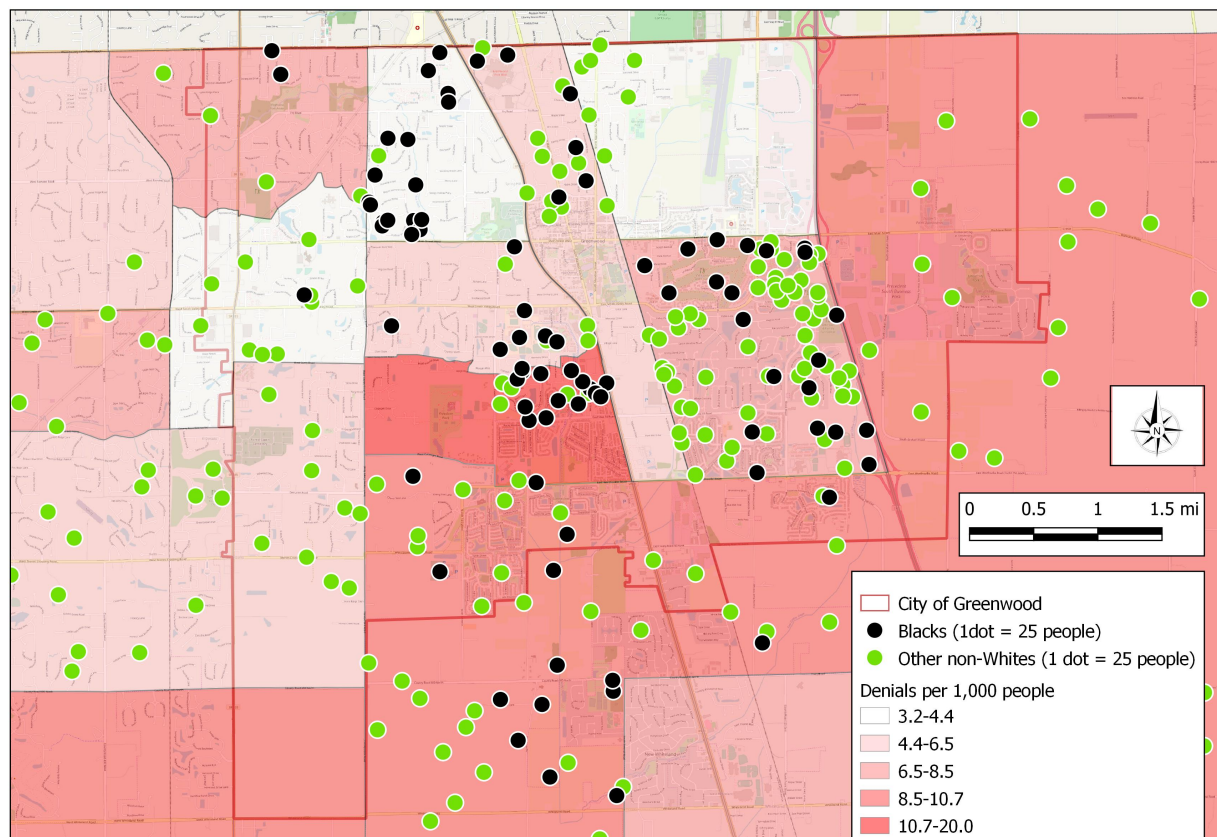


Figure 20: HMDA Denial Analysis

The following chart “Figure 21: Total Denials (Number and Aggregate Value) by Minority Population of Census Tract” lends a little more insight; this chart plots the minority population by the number and aggregate value of denials for all of Johnson County by Census Tract, bearing in mind that the high-minority population Census Tracts are found in the City of Greenwood. There are two (2) Census Tracts with relatively high minority populations, and high populations overall, and both of these Census Tracts have a relatively high number of denials. However, plotting the aggregate value of denied loans shows no significant relationship.

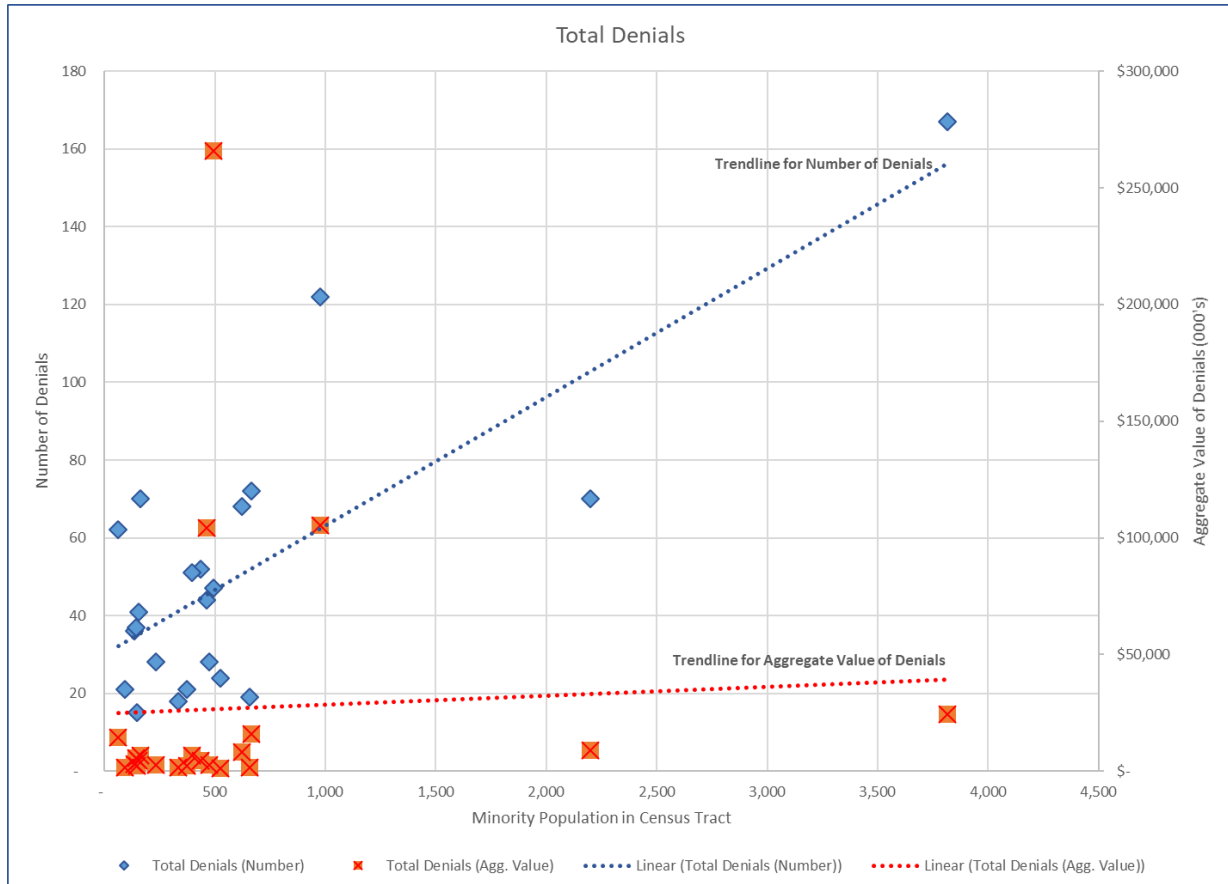


Figure 21: Total Denials (Number and Aggregate Value) by Minority Population of Census Tract



## IV: Land Use Profile

### Existing Land Use

The existing land use classifications for the City's planning jurisdiction can be found in its Comprehensive Plan. A map of existing land uses, copied from that document, follows below in Figure 22. It is important to note that the Comprehensive Plan dates from 2007, and its analysis requires updating.

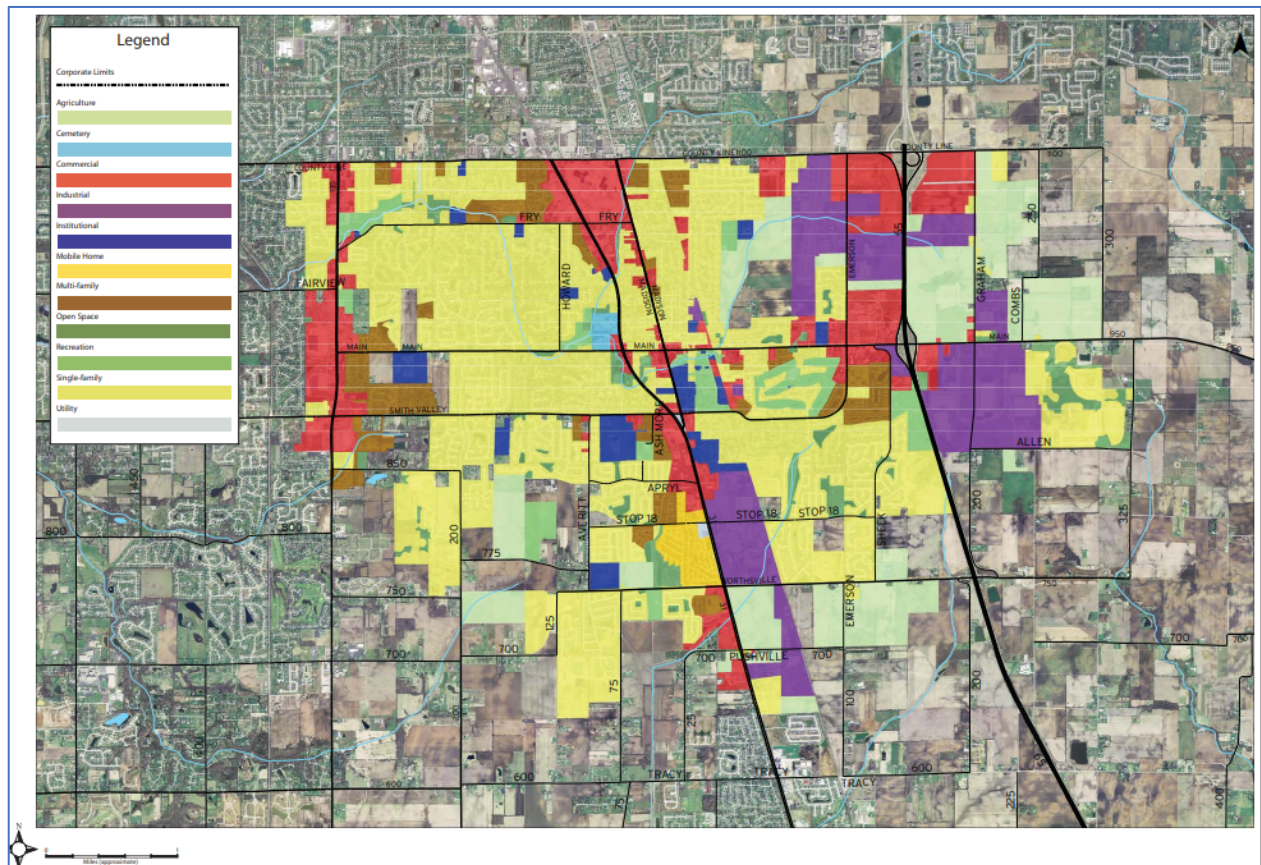


Figure 22: Existing Land Use



## Zoning Regulations

A map of the zoning classifications was used to identify major land use patterns. These districts are summarized by major categories in “Figure 23: Zoning Districts.”

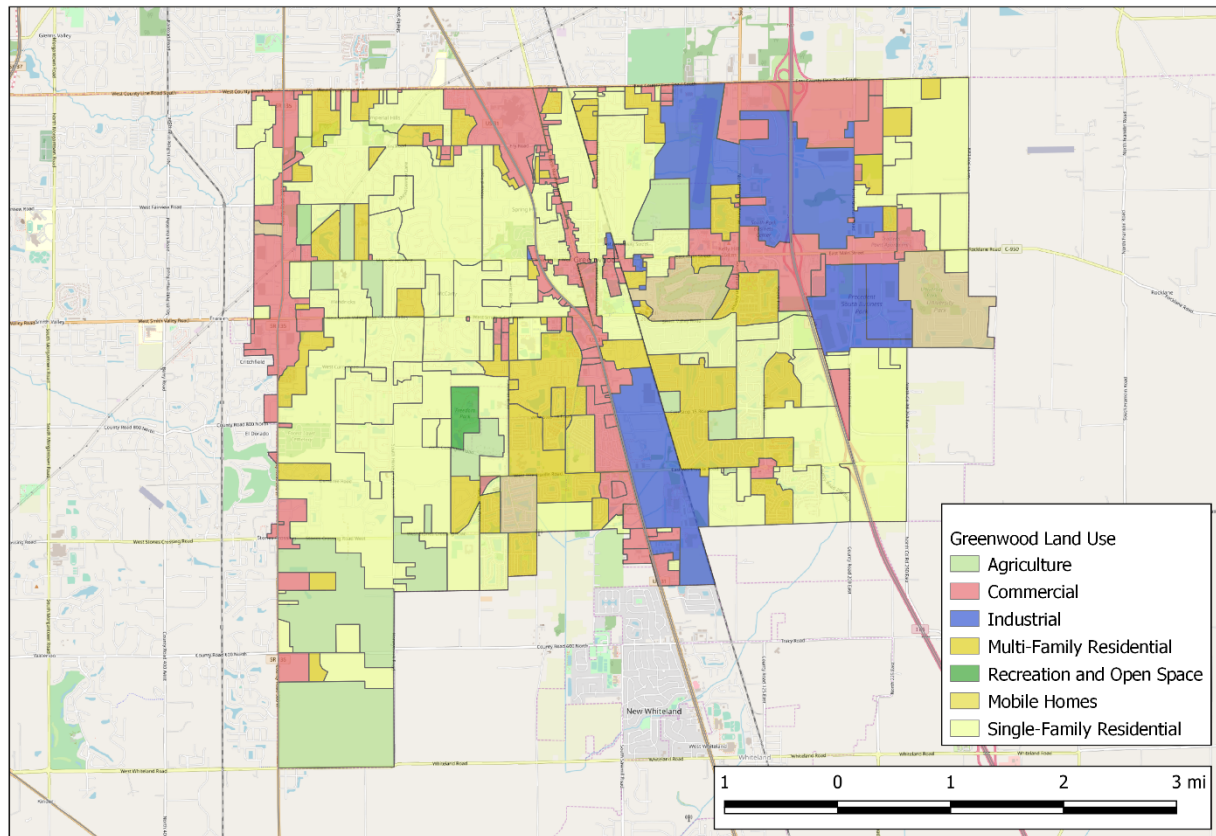


Figure 23: Zoning Districts

## Comprehensive Plan

The City's Comprehensive Plan was last updated in 2007; typically, communities in growing areas update such plans every 5 to 10 years, so an update is overdue.

The Comprehensive Plan lists the following as a land use goal (p 38):

Goal #4: Provide for the housing needs of Greenwood's present and future residents.

- Provide for a mix of housing, varying in type, size, location, and quality to meet the housing needs of the community.

The Plan also includes the following land use plan:

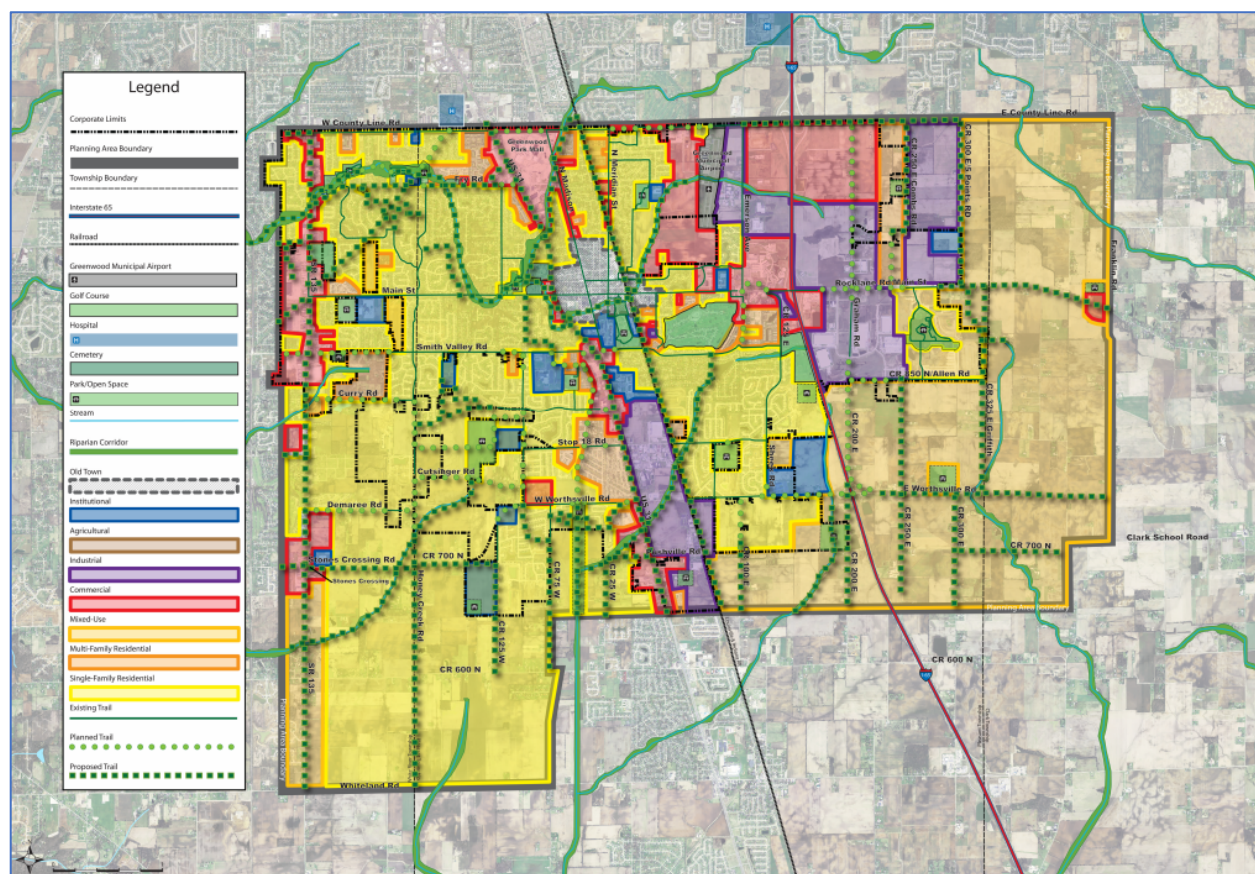


Figure 24: Greenwood Land Use Plan

It is clear from the map that with regards to residential uses, the overwhelming focus is on single-family units. The Plan does discuss flexible residential arrangements; for example, the Strategic Plan Chapter (Chapter 10) lists “Encourage development of additional housing types such as townhouses, live over work and elderly housing” as an action in its “Zoning & Subdivision Control Ordinance Revisions” section (p 113). As of this writing (June 27, 2019) it is not known if these recommendations have been advanced.

## Planning and Recording Fees

Fees listed below do not include sign costs for required public notices.

- Single-family residential use variance: \$300
- All other use variances: \$700
- Single-family residential dimensional variance: \$150 plus \$50 for each additional variance.
- All other dimensional variances: \$250 plus \$150 for each additional variance.
- Zoning Map Change: \$800
- Planned Unit Development Concept Plan rezoning: \$250
- Special exception: \$400
- Platting Changes or Vacations: \$250
- Primary and Secondary Plats (each): \$1,000 plus \$5 per lot.
- Residential Site Plan: \$1,000
- Change in Commitments: \$100

Single-family residential uses receive preferential treatment in many of these categories, with the associated fees being substantially less than their non-single-family counterparts (including multi-family residential).

## Building, Occupancy and Health and Safety Codes

The City's Building Commissioner's Office levies the following permit and impact fees on construction of new residential units:

FEES DUE AT TIME OF PERMIT ISSUANCE		
Building Permit Fee	Single-Family	\$350 base fee plus \$0.02 per square foot
	Two-Family	\$450 base fee plus \$0.02 per square foot
Park Impact Fee	Single-Family	\$1,283.56
	Two-Family	\$1,219.38 per unit = \$2,438.76
Sewer Connection Permit Fee	Single-Family	\$835 (based on either a ¾” or 5/8” water meter)
	Two-Family	\$1,670 (based on either a ¾” or 5/8” water meter for each side)
Sewer Availability Fee	Single-Family	Varies - To be figured upon application.
	Two-Family	
Erosion and Sediment Control Permit Fee	CURRENTLY NO CHARGE	

Figure 25: Single- and Two-family Permit and Impact Fees

<b>FEES DUE AT TIME OF PERMIT ISSUANCE</b>		
<b>Building Permit Fee</b>	<b>New Building</b>	\$100 per unit + \$.02 per sq. ft. per building + \$100 per acre of entire project. The acreage fee will be added to one permit.
<b>Sewer Connection Permit Fee</b> Based on Water Meter Size	For each 3/4" or 5/8" water meter	\$835.00
	For each water meter larger than 3/4" but less than 2"	\$2,087.00
	For each 2" water meter	\$8,346.00
	For each water meter over 2"	\$19,196.00
<b>Sewer Availability Fee</b> Based on Water Meter Size	For each 3/4" or 5/8" water meter	\$2,073.00
	For each 1" water meter	\$5,389.80
	For each 1 1/2" water meter	\$12,023.40
	For each 2" water meter	\$20,730.00
	For each 3" water meter	\$47,679.00
	For each 4" water meter	\$84,993.00
	For each 6" water meter	\$190,716.00
	For each 8" water meter	\$339,972.00
<b>Park Impact Fee</b>	For each One Bedroom Unit	\$834.31
	For each Two Bedroom Unit	\$1,091.02
	For each Three Bedroom Unit	\$1,283.56
<b>Erosion and Sediment Control Permit Fee</b>	(applicable to land disturbances greater than 10,000 sf, but less than 1 acre) <b>CURRENTLY NO CHARGE</b>	
<b>Stormwater Management Permit Fee</b>	(applicable to land disturbances of 1 acre or more) <b>\$50.00</b>	

Figure 26: Multi-Family Permit and Impact Fees

These fees appear to be reasonably balanced, with permit and impact fees being somewhat less per multi-family unit than for single-family units. Remodeling fees for multi-family units are somewhat higher at about \$500 per petition; single-family remodeling fees are \$100.

The City has adopted Residential Architectural Design Standards for new residential development. There are two sets of standards, one for single/two-family units, and another for multi-family (3 or more) units. The standards use a point system, where new units must have a minimum number of design elements from a pre-specified list. While design standards have the effect of raising the cost of construction, it is not clear whether these standards bias residential development towards or away from single-family units. However, if these standards are triggered when affordable housing is being developed, they can raise the transactional costs incurred by a homeowner or landlord.



## Public Transportation

The City is served by two (2) public transportation systems, as shown in “Figure 27: Public Transit.” Access Johnson County (AJC), operated by the not-for-profit Gateway Services, Inc., operates three deviated fixed-route routes – two which serve the west and east ends of the City, respectively, and a third that connects into the City of Franklin to the south.

The second system is the Indianapolis Public Transportation System, a.k.a. “IndyGo”; the system’s primary service area is Marion County to the north, but several routes extend to activity centers in Greenwood and connect residents to City of Indianapolis activity centers. IndyGo is also implementing Bus Rapid Transit routes, including the “Red Line” that will extend from the Indianapolis Central Business District south to the University of Indianapolis, about five (5) miles north of Greenwood’s northern boundary; although the system is not yet operational, an extension is planned even further south into the City of Greenwood proper. Routing, station, timing, and funding decisions for this extension are currently under discussion.

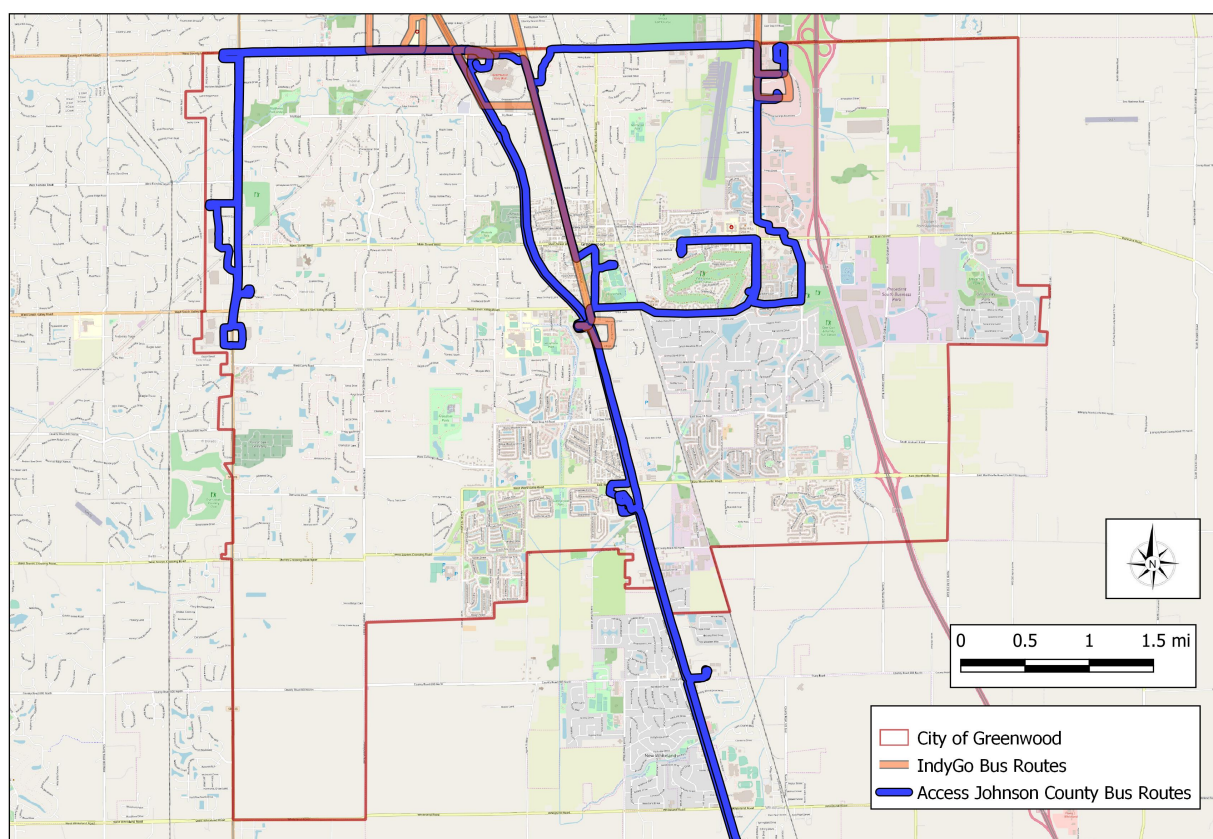


Figure 27: Public Transit

## V: Compliance Data

### Current Cases

There are no known active fair housing cases in the City of Greenwood; however, there is no active testing program, either. On January 27, 2014, the Fair Housing Center of Central Indiana filed *FHCCI v. Friedman Integrated/Clearview Apartments* case with HUD-Chicago as a systemic investigation. The complaint alleged discrimination by the Greenwood property due to disability in the Respondent's requirement to pay "pet fees" for a needed animal for a person with a disability. A resolution was reached in July 2014 with the Respondents agreeing to changes in rules and policy, participation in fair housing training, reimbursement of the FHCCI's costs, and other affirmative relief.

### Property Taxes

In March 2008, the Indiana General Assembly passed bill SJR0001 to limit the amount of property taxes beginning in 2012 for the entire state of Indiana. The limit for homeownership properties will be one percent of the assessed value. The limit for rental properties will be two percent of the assessed value. The limit for commercial properties will be three percent of the assessed value.

Proponents of the new tax law argue the single tax rate across the State of Indiana will eliminate disparities between properties based on location. In Johnson County, there are 12 different taxing districts that overlap with the City of Greenwood's Corporate Boundaries, including the following:

- CENTER GROVE COMMUNITY SCHOOL CORP
- CLARK TOWNSHIP
- CLARK-PLEASANT COMMUNITY SCHOOL CORP
- GREENWOOD CIVIL CITY
- GREENWOOD COMMUNITY SCHOOL CORPORATION
- GREENWOOD PUBLIC LIBRARY
- JOHNSON COUNTY
- JOHNSON COUNTY PUBLIC LIBRARY
- JOHNSON COUNTY SOLID WASTE
- PLEASANT TOWNSHIP
- WHITE RIVER TOWNSHIP
- WHITE RIVER TOWNSHIP FIRE SERVICE

According to the 2018 tax rates available on the Indiana Department of Local Government Finance web page, not every district taxes every property the same and the rates vary by location. Some properties are taxed at a rate as low as 1.65 percent while others are taxed at a rate of 3.23 percent. For a property valued at \$100,000, the variance could equal as much as \$1,600 annually dependent on the location of the property.

The single tax rate does have potential problems. Higher taxes for rental properties may be passed along to the end consumer, or the lessee of the property, in the form of higher rents. This could have an adverse effect on lower income individuals renting properties with higher property taxes. While not all low-income individuals are minorities, those individuals in the protected classes tend to rent their housing more than own housing. The ramifications of the property tax overhaul may have an adverse effect on the protected classes if those individuals or households are primarily renters.

## Government Programs and Education

The Indiana Civil Rights Commission (ICRC) serves as the primary investigative and resolution agency for fair housing complaints for the State of Indiana. The ICRC is contracted by the U.S. Department of Housing and Urban Development (HUD) to investigate fair housing discrimination. The ICRC has substantial equivalence certification, meaning they enforce a fair housing law that provide substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. HUD may refer complaints of housing discrimination to the ICRC as the nearest federal fair housing office is located in Chicago, IL.

Complaints may follow an eight-step process; however, most complaints are resolved within the first three steps. Figure 28 demonstrates the complaint and resolution process.



Figure 28: Complaint Process for the Indiana Civil Rights Commission

“Complainants” identities are confidential except to the extent necessary to complete the investigation. If it is necessary to disclose the complainant’s identity to the alleged person who may have discriminated or a third-party, the City of Greenwood must first obtain the complainant’s written consent. The City must also obtain the complainant’s written consent before providing a copy of the complaint to any other individual(s) involved with the investigation.

Appeals of the decisions made by the City may be filed with the Department of Justice in Washington DC.

Any investigation not within the jurisdiction of the City is referred to the appropriate federal or state investigative organizations.

### Advocacy and Testing

The Fair Housing Center of Central Indiana, incorporated in April 2011, is a non-profit organization with a mission to eliminate housing discrimination through advocacy, education, enforcement and outreach. The Fair Housing Center of Central Indiana serves thirteen counties in Central Indiana: Boone, Clinton, Delaware, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Monroe, Morgan, Rush, and Shelby. Other areas of Indiana may be served as budgets allow. The Fair Housing Center of Central Indiana also conducts testing programs to determine the level of housing discrimination in Central Indiana and to use as a way to advocate for more education and training for those in the community.

Currently, no systematic testing is known to be conducted in the City of Greenwood. Paired testing is a procedure where two individuals are individually sent inognito to solicit rents from rental properties. These individuals are matched in every relevant aspect except for the characteristic that is being tested. For example, in a race test a matched pair test would be conducted with a Person of Color and a White tester making contact with and visiting the same property within a short time period of each other. The testers would have similar characteristics for income, family size and other relevant factors. The matching of testers is important because it removes any financial or business justifications for rejecting the protected group tester. Equally qualified individuals seeking the same kind of housing should receive similar treatment and be given similar information. If there is only one difference (in this case, race), that is likely to be the factor causing any differential treatment.

Testers must ask questions and observe treatment. The eight primary categories FHCCI utilizes for comparison results include:

1. Difference in rental amount
2. Difference in information regarding the availability of units
3. Difference in security deposit amount
4. Difference in move in specials offered
5. Difference in treatment during the onsite appointment
6. Difference in access to the rental application
7. Difference in treatment before or after onsite visit
8. Steering

The consultant team recommends testing should be conducted to get a better picture of what types of treatment is found in the City of Greenwood.

### Self Evaluation

As the City of Greenwood is a new Entitlement Community, it has not had the opportunity to establish a track record with regards to affirmatively furthering fair housing. It is noteworthy that most of its anticipated CDBG funding will go to fund recreational infrastructure.



## VI: Community Input

This Analysis of Impediments (AI) process sought input from a broad array of citizens and professionals on the severity and types of fair housing issues being faced by the City. This section documents the types of outreach that were conducted, and summarizes the findings.

### Professional/Stakeholder Interviews

Interviews with community representatives and professionals were conducted jointly with those for the Greenwood Consolidated Plan. A list of persons and organizations who were interviewed are included in Appendix B.

The following observations were made by these participants:

- Education opportunities for fair housing in the City could be expanded considerable.
- Owners of rental housing within the City have vocally suggested a minimum age (24 years) for leaseholders.
- Some homebuilders have alleged that building/subdivision approvals were denied because the proposed developments had an exceedingly high density.
- The City seems to be hesitant to participate in HUD's Fair Housing Assistance Program, which provides funding for fair housing education, as well as for the investigation of fair housing complaints.
- State restrictions on habitability inspection fees (a maximum of \$5) hamper the City's ability to recoup inspection costs, which pressures the City to lower the amount of time spent for each individual inspection.
- The length of time it takes for the Housing Choice Voucher program to approve a unit – up to five (5) months in some instances – can exceed a landlord's willingness to hold a unit open.

### Public Input

Two (2) public meetings were held to jointly discuss the AI and the Greenwood Consolidated Plan, on June 25, 2019 from 5 pm to 7 pm and July 2, 2019 from 11 am to 1 pm. Both meetings were held at the City Building first floor meeting room. The June 25<sup>th</sup> meeting was unattended; the July 2<sup>nd</sup> meeting had four (4) attendees. General findings pertinent to the AI include the following:

- Housing affordability as a policy objective competes with community livability. Participants reacted negatively to perceptions of mobile homes and high-density neighborhoods, voicing a desire for more large-lot development and homes made from high-quality materials (e.g., brick).
- Fixed-income households and "working families" are seen as being effectively excluded from the City. Interestingly, a concern was also voiced over the potential exclusion of middle-class households.
- Public transportation and access to healthy food were seen as concerns for low-income areas of Greenwood.

## VII: Fair Housing Impediments, Recommendations and Action Plan

This section outlines the actions and strategies that the City should implement, along with recommended timetables, to address the impediments and challenges that have been noted thus far.

<b>Impediment/Challenge</b>	<b>Resolution/Outcome</b>	<b>Date to be Accomplished</b>
Housing problems localized in areas of low to moderate income households.	Fund the development of affordable housing at a greater rate.	Annually for the next five years.
Housing problems localized in areas of low to moderate income households.	Advocate for housing vouchers and landlords to accept housing vouchers to be used outside of low to moderate income areas.	Annually for the next five years.
Found higher rates of denials in census tracts with higher concentrations of racial minorities.	Fund further research of the data to determine if there is a strong correlation for loan denials in areas of color.	Complete by the end of fiscal year 2022.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Will work with not for profit developers to seek additional funding for the development of affordable housing in the City of Greenwood.	Complete by the end of fiscal year 2021
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Advocate on behalf of affordable housing developers in the community to bring state and federal resources to the City of Greenwood. <ul style="list-style-type: none"><li>• Publish articles on local work in affordable housing via the paper, web or Facebook</li><li>• Host monthly or quarterly provider meetings to help with advocacy</li></ul>	Annually for the next three years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Require replacement of housing stock removed for transportation with housing of similar value or cost to ensure affordable housing is not decreased.	Annually for the next five years.

<b>Impediment/Challenge</b>	<b>Resolution/Outcome</b>	<b><u>Date to be Accomplished</u></b>
Lack of affordable housing affects housing choice and may adversely affect the protected classes	Encourage local units of government to create and complete a rental housing unit registry and annual inspection process to ensure all units for all families are safe and decent places to live.	Complete by the end of fiscal year 2021.
Lack of affordable housing affects housing choice and may adversely affect the protected classes	Publish a listing of rental properties that will accept housing choice vouchers and other housing assistance to help households locate affordable housing in the City of Greenwood	Complete by the end of fiscal year 2020. Maintain annually.
Lack of local fair housing ordinance.	The City of Greenwood will work towards establishing a local fair housing ordinance.	Complete by the end of fiscal year 2022.
Knowledge of fair housing laws and where to report vary in the community.	Begin a testing program of multi-family communities to ensure property managers are following fair housing laws.	One test before 2021. A second test before the completion of the Consolidated Planning period of 2023.
Knowledge of fair housing laws and where to report vary in the community.	Provide educational programming for public officials, particularly who are newly elected, on fair housing issues.	Annually for the next three years.
Knowledge of fair housing laws and where to report vary in the community.	Provide educational programming to increase awareness in the community.	Annually for the next five years.
Knowledge of fair housing laws and where to report vary in the community.	Establish a website, linked to the main City of Greenwood home page, that will promote fair housing and connect residents to places of advocacy and investigative knowledge. This web page should include direct links to the U.S Department of Housing and Urban Development's Fair Housing website, as well as the Indiana Civil Rights Commission and the Fair Housing Center of Central Indiana.	Fiscal Year 2019.

<b>Impediment/Challenge</b>	<b>Resolution/Outcome</b>	<b>Date to be Accomplished</b>
Institutional and regional coordination of enforcement and advocacy needs to improve.	Will work with not for profit developers to seek additional funding for fair housing programs and increase the capacity of staff to affirmatively further fair housing, including increasing education, greater communication with other enforcement agencies, outreach to members of the protected classes, development of affordable housing in a meaningful way.	Seek and apply for a resource by 2021
Institutional and regional coordination of enforcement and advocacy needs to improve.	Coordinate efforts in the City of Greenwood with neighboring entitlement communities, such as Anderson, Indianapolis, Muncie and the State of Indiana.	Annually over the next five years.
Institutional and regional coordination of enforcement and advocacy needs to improve.	The City should clarify its anti-discrimination policy fair housing ordinance that includes all the usual protected classes as well as sexual orientation and gender identity and veteran military status.	Complete by the end of fiscal year 2020.
Institutional and regional coordination of enforcement and advocacy needs to improve.	Work with partners to actively promote fair housing testing within the Greenwood rental housing community.	Complete by the end of fiscal year 2020.
Institutional structure and regulation promote housing design but may increase the cost of development of housing.	Participate in review of zoning documents for growing cities to ensure the documents encourage all types of housing development, including housing at all price points yet keep quality standards.	Implement during the City's next regular update/review of its Comprehensive Plan and zoning/subdivision ordinances.