

Analysis of Impediments to Fair Housing Choice

Enid, Oklahoma

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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Jurisdiction: City of Enid, Oklahoma

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SECTION A – Background on Analysis of Impediments to Fair Housing Choice

The United States Department of Housing and Urban Development (HUD), to affirmatively further fair housing choice, requires jurisdictions receiving Federal funding to conduct an Analysis of Impediments to Fair Housing Choice (AI) as part of their Consolidated Plan and Fair Housing Planning. As an entitlement jurisdiction, the City of Enid is eligible for funding from the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. In order to comply with HUD's fair housing review criteria, the City has conducted an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments is a review of the jurisdiction's laws, regulations, administrative policies, procedures, and practices to assess how these affect the location, availability, and accessibility of housing for all persons. The analysis is also an assessment of the conditions, both public and private, affecting fair housing choice and examines impediments associated with federal regulations. According to HUD's Fair Housing Planning Guide, impediments are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choice or the availability of housing choice. An impediment is also any action, omission, or decision which has the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status, and national origin.

The City of Enid is committed to working for the elimination of any impediments in public or private housing practices that have the effect of discriminating on the basis of "race, color, religion, sex, national origin or handicap" (Sec. 10-7 of Enid Municipal Code, 1994). This commitment follows the principles and components of the HUD Housing and Community Development programs, which, in turn, implement the provisions of Section 808 (e)(5) of the Fair Housing Act. Although the City promotes fair housing principles and enforces fair housing laws, review of potential impediments is essential to sustain fair housing choice opportunities for all residents.

The Analysis of Impediments to Fair Housing Choice was prepared for the City of Enid by The University of Oklahoma, College of Continuing Education, Center for Business and Economic Development. The project was funded through the Community Development Block Grant program provided by the United States Department of Housing and Urban Development.

SECTION B – Executive Summary and Highlights of Report Findings

- Federal regulations issued by HUD governing the Consolidated Plan require that Enid, Oklahoma complete an Analysis of Impediments to Fair Housing Choice, or a fair housing plan.
- Enid, Oklahoma has taken several steps to address fair housing issues.
- The proposed Enid, Oklahoma Analysis of Impediments to Fair Housing was developed by the University of Oklahoma, Center for Business and Economic Development (CBED), which is located on the campus of the College of Continuing Education. CBED is an Economic Development Administration (EDA) University Center that provides technical assistance throughout the State of Oklahoma. Revisions and updates are completed by the CDBG Coordinator for the City of Enid.
- The Analysis of Impediments to Fair Housing Choice study identifies three (3) potential impediments. Each of the following three (3) issues of concern is formatted with background information, definition of issues, and recommendations.
 1. Fair Housing Awareness Education and Action
 2. Display and Use of Fair Housing and Equal Opportunity (FHEO) Logo and Clause
 3. Public Transportation Facilities in Enid
- Federal regulations require that the city “take appropriate actions to overcome the effects of any impediments identified in the analysis of impediments, and to maintain records reflecting the analysis and actions in this regard.”
- The Analysis of Impediments to Fair Housing recommends that the implementation of fair housing planning in Enid be accomplished with the leadership of the City of Enid and the Community Development Support Association (CDSA) with the assistance of HUD guidelines, policies, and resources.

SECTION C – Community Background Data

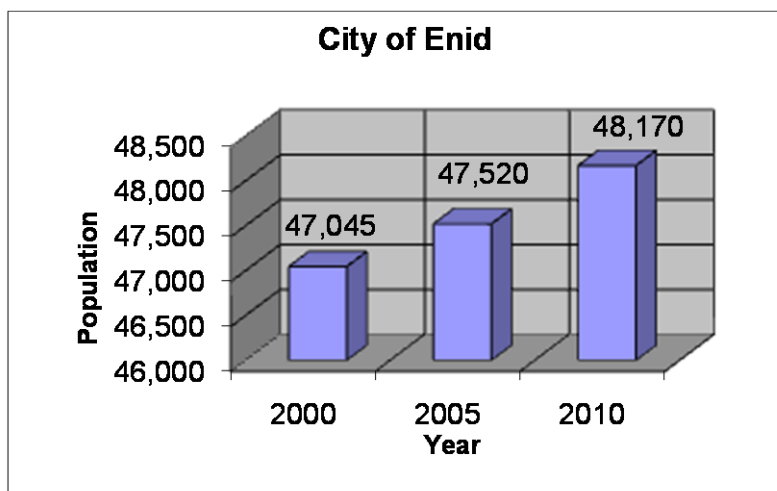
To better illustrate several of the variables that may have a direct or indirect affect on fair housing issues, a discussion of topics ranging from population, race, age, income, housing, and employment follows. The information has been extracted from a variety of sources, including:

- U.S. Census Bureau (1990 and 2000),
- City of Enid Five-Year Consolidated Plan: Fiscal Years 2008 – 2012,
- *The 2006 Community Needs Assessment for the City of Enid, Garfield County, Oklahoma* prepared by the Enid Metropolitan Area Human Service Commission, the United Way of Enid and the Northwest Oklahoma Community Development Support Association, Inc. (CDSA), and
- Oklahoma Department of Commerce

Population Profile

According to the U.S. Census, the 2010 population of the City of Enid was 49,379. This is an increase of 2,334 individuals and a 1.05% increase from the 2000 U.S. Census' reported population of 47,045. According to Oklahoma Department of Commerce population projections, the City of Enid will experience only slight growth during the next ten years. The population forecast for the City of Enid in the year 2010 calculates that Enid will experience an approximate 2.39% increase in population, reflecting a total population of 48,170.

Figure 1 City of Enid Population and Population Forecast: 2000, 2005 & 2010



Source: U.S. Census Bureau, 2000 U.S. Census and Oklahoma Department of Commerce

It should be noted that any significant changes in the regional economy and/or local and federal government decisions could significantly influence the future growth trends of the City of Enid. One of the greatest determinants

of growth for the City of Enid will be made in the year 2005 as a round of BRAC base closures will be made. Although the City of Enid feels that the outlook for Vance Air Force Base (AFB) continuation of operations is optimistic, the threat of permanent base closure still exists. Vance AFB is the top employer in the City of Enid in terms of sheer employment numbers. Without adequate planning, the closure of Vance AFB could prove to be a tremendous indicator to future growth trends of the city.

Population by Race

According to the 2000 and 2010 U.S. Census, racial composition of the total population for the City of Enid is as follows:

Table 1 City of Enid: Racial Composition

Comparison	2000	2010
Total Population	47,045	49,379
White Alone	41,015	40,300
Black/African American Alone	1,840	1,768
American Indian and Alaskan Native Alone	999	1,144
Asian Alone	472	531
Native Hawaiian and Other Pacific Islander Alone	271	1,082
Other Race Alone	1,112	2,659
Two or More Races		
	1,336	1,895

Source: U.S. Census Bureau, 2000 & 2010 U.S. Census

It is clear that the White population composes the greatest racial component of the City of Enid at 81.6%. Blacks/African Americans make up approximately 3.6% of the total population; American Indians/Alaskan Natives represent 2.3% and Asians 1.1%. Native Hawaiians/Pacific Islanders made up only a very small fraction of the racial composition in the 2000 Census data at 0.57%, with a large increase of 1.6% over ten years making the Native Hawaiian and other Pacific Islander population a total of 2.2%.

The household population defined by race for the City of Enid, according to the 2000 and 2010 U.S. Census is displayed in Table 2.

Table 2 City of Enid: Racial Composition of Households

Comparison	2000	2010
Total Number of Households	18,955	19,726
Households, White Alone	17,118	17,143
Households, Black/African American Alone	666	694
Households, Native American/Alaskan Native Alone	319	365
Households, Asian Alone	151	174
Households, Native Hawaiian and other Pacific Islanders	49	190

Households, Some Other Race Alone	296	720
Households, Two or More Races	356	440

Source: U.S. Census Bureau, 2000 & 2010 U.S. Census

As can be seen from Table 2, White households compose the greatest percentage of the total households at 86.9% and Black/African American households compose the next highest percentage at 3.52%. The remaining percentages are as follows: Native American/Alaskan Native Alone at 1.85%, Asian Alone at 0.88%, Native Hawaiian and Other Pacific Islanders Alone at 0.96%, Other Races Alone at 3.65%, and Two or More Races at 2.23%.

A further breakdown of the racial composition of the City of Enid is provided in Table 3. In Table 3, the City of Enid is disaggregated into the nine census tracts that lie inside the City of Enid limits. **It should be noted that some persons accounted for within the nine census tracts do not live within the city limits.** In other words, 7.3% of the persons accounted for in all nine census tracts do not live within the city limits of Enid.

Table 3 City of Enid: Racial Distribution by Census Tract

RACE	CT 1	CT 2	CT 5	CT 6	CT 7	CT 10	CT13	CT 14	CT 15	Race Total
White Alone	5,016	2,378	821	5,029	4,793	7,379	7,105	6,801	5,264	44,586
Black / African American Alone	221	37	79	427	253	249	149	124	221	1,760
American Indian / Alaska Native Alone	160	93	10	159	140	171	27	250	132	1,142
Asian Alone	29	14	24	46	0	104	132	161	4	514
Native Hawaiian / Other Pacific Islander Alone	4	2	1	0	135	3	0	0	97	242
Some other race Alone	195	0	48	78	391	46	31	26	102	917
Two or more races	265	49	57	316	225	183	119	107	243	1,564
Census Tract TOTAL	5,890	2,573	1,040	6,055	5,937	8,135	7,563	7,469	6,063	50,725
Minority Percentage (%)	14.8	7.5	21.1	16.9	19.2	9.3	6.1	8.9	13.2	12.1

Source: U.S. Census Bureau, 2000 U.S. Census

It is necessary to divide the City of Enid into its census tract components in order to examine the racial composition to determine if the small minority population that exists in the City of Enid is not being displaced into one particular area of the city. Table 3 reveals that the highest proportion of minorities in relation to the white population is found in Census Tract 5. Census Tract 5 is almost entirely occupied by Vance AFB and maintains the second highest median household income of the nine tracts that compose Enid. The census tract with the second highest minority population, Census Tract 7, has the lowest median household income out of the nine census tracts (see Table 4). Census Tract 6 has the third highest minority population and the fourth lowest median household income in the City of Enid. Census Tract 1 has the fourth highest population of minorities and has the second lowest median household income in the City of Enid.

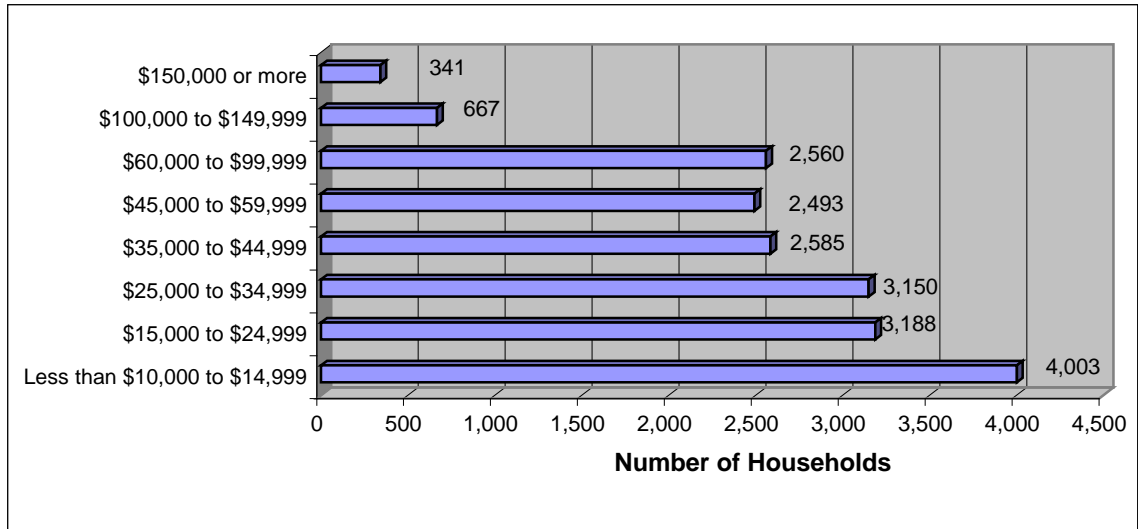
Income

Discussions of impediments to fair housing would be incomplete without discussing income in the City of Enid. The median household income of the City of Enid in 1999 was \$32,227 according to the U.S. Census Bureau. When looking at household income and the current housing stock in the City of Enid, it becomes apparent as to why there is a need for affordable housing. Table 4 and Figure 2 below represent breakdowns of household income for the City of Enid.

Table 4 City of Enid: Median Household Income by Census Tract

Census Tracts	2000 Median Household Income (\$)
CT 1	25,260
CT 2	36,087
CT 5	45,795
CT 6	29,466
CT 7	21,647
CT 10	36,077
CT 13	51,907
CT 14	35,836
CT 15	29,074

Figure 2 City of Enid: Household Income Breakdown



Source: U.S. Census Bureau, 2000 Census

As Figure 2 indicates, 21.08% of households in the City of Enid have a household income that falls between less than \$10,000 and \$14,999. This means approximately one in five households is making less than \$14,999 a year in the city. 33.38% of Enid households have a household income that falls between \$15,000 and \$34,999. Households accruing income between \$35,000 and \$59,999 a year account for 26.74% of the total households. 13.48% of households attain between \$60,000 and \$99,999 a year and the remaining 5.30% of the households in Enid have a yearly household income over \$100,000.

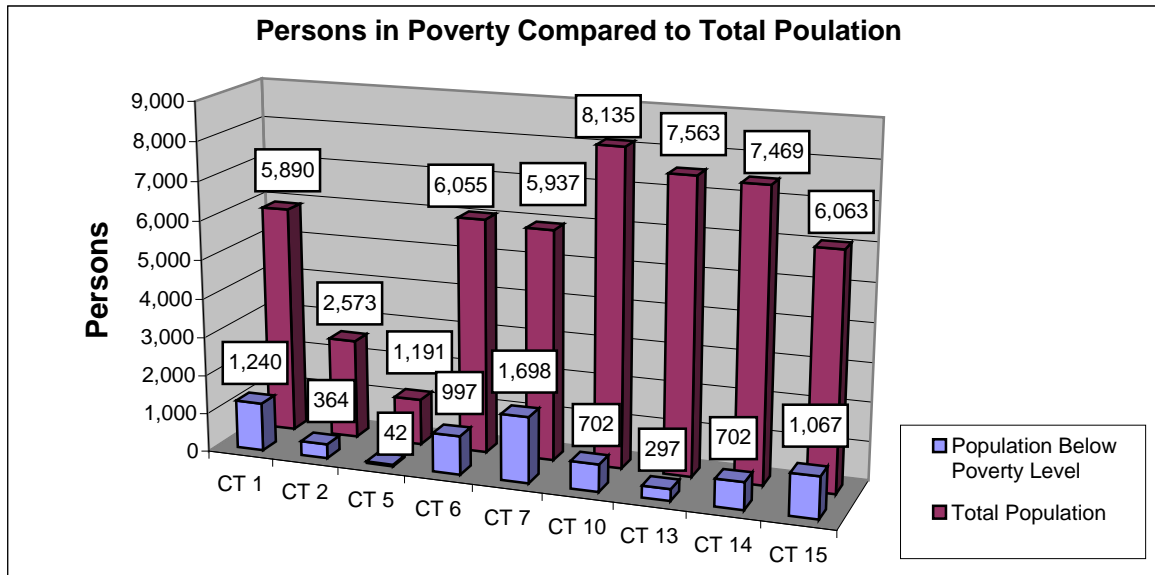
Examination of conditions of poverty in Enid is also necessary to understand fair housing opportunities in the city. The figure and table below provide a visual representation of the extent of poverty, as determined by the 2000 U.S. Census, in the City of Enid.

Table 5 Poverty Population by Census Tract

Census Tracts	Total Population	Population Living Below Poverty Level	% of Persons Living Below Poverty Level
CT1	5,890	1,240	21.05
CT 2	2,573	364	14.15
CT 5	1,191	42	3.53
CT 6	6,055	997	16.47
CT 7	5,937	1,698	28.60
CT 10	8,135	702	8.63
CT 13	7,563	297	3.93
CT 14	7,469	702	9.40
CT 15	6,063	1,067	17.60

Source: U.S. Census Bureau, 2000 U.S. Census

Figure 3 City of Enid: Poverty Population by Census Tract

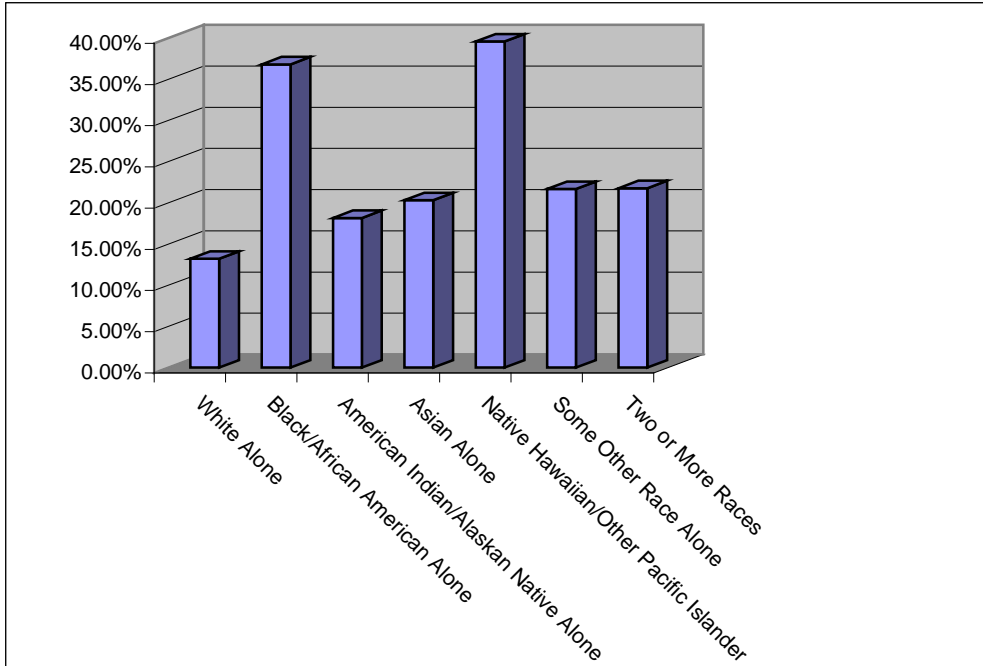


Source: U.S. Census Bureau, 2000 U.S. Census

The highest concentration of poverty (28.60%) in the City of Enid exists in Census Tract 7, which is the fourth lowest populated census tract in the City of Enid and has the second highest percentage of minority population. The second highest concentration of poverty is located in Census Tract 1, the seventh most populated Census Tract with 21.05% of its total population living below poverty. Census Tract 15 has the fifth largest percentage of minority population at 13.18% and the third highest concentration. The lowest concentration of poverty, 3.53% exists in Census Tract 5, which is composed almost entirely of Vance AFB and is the least populated census track in the City of Enid. It should be noted that Census Tract 5 contains the highest percentage of minorities out of all nine census tracts.

The conditions of poverty in the City of Enid have affected the Hawaiian/Pacific Islander and the Black population more than the other population components. While 39.56% of the total Hawaiian/Pacific Islander population live in poverty, 36.77% of the total population of Blacks/African Americans live in poverty, followed by Two or More Races with 21.75% of their total population living in poverty, 21.66% of the total population of "Some Other Race" live in poverty, and finally 20.29% of the total population of Asians live in poverty.

Figure 4 City of Enid: Minority Population Living in Poverty



Source: U.S. Census Bureau, 2000 U.S. Census

Housing Profile

Moderate single-family development occurred in the City of Enid during the past several years. Recently, a surge in single-family dwelling unit development was fueled largely by low mortgage interest rates. Multi-family dwelling unit development has also increased as the first apartment complex built since the 1980s recently opened in March of 2002. This particular complex consists of 96 units and is operated under Section 42 of the IRS Low Income Housing Tax Credit (LIHTC) Program.

A majority of the new housing developments, both rental and owner occupied, is occurring on the northwestern fringe of the township. It is interesting to note that the two newest affordable housing projects were constructed in the far western part of the city in (2000) Census Tract 10; which maintains the fourth highest median family income and has the fourth lowest percentage of minority population. Table 6 provides information concerning the current housing stock profile in the City of Enid.

Table 6 City of Enid: Housing Stock by Census Tract

Census Tract	Single Family Housing	Multi Family Housing	Mobile Homes, Boats and RVs	Total Housing Units
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CT 1	2,552	272	15	2,839
CT 2	904	21	105	1,030
CT 5	85	155	6	246
CT 6	2,284	555	39	2,878
CT 7	2,484	330	39	2,853
CT 10	2,863	498	261	3,622
CT 13	2,812	239	129	3,180
CT 14	3,006	450	15	3,471
CT 15	2,375	219	128	2,722
TOTAL:	19,365	2,739	737	22,841

Source: U.S. Census Bureau, 2000 U.S. Census

It is easy to gather from Table 6 that single-family homes are the most utilized types of dwelling units in the City of Enid. In all census tracts, except Census Tract 5 (which is composed almost entirely of Vance AFB), the number of single-family detached dwelling units composes the greatest percentage of units.

The greatest percentage of multi-family housing in relation to total housing units (63.00%) is located in Census Tract 5. This is explained by the fact that military housing is located on site of Vance AFB. The second greatest percentage of multi-family housing in relation to total housing units (19.28%) is located in Census Tract 6, which has the third highest minority population. A complete breakdown of multi-family dwelling units in relation to total housing units and minority populations is explicated in Table 7.

Table 7 City of Enid: Comparison of Total Housing Units, Multi-Family Housing Units, and Minority Population

Census Tract	Total Housing Units	Multi-Family Housing Units	Multi-Family Housing Percentage (%)	Minority Population Percentage (%)
CT 1	2839	272	9.58	14.84
CT 2	1030	21	2.03	7.58
CT 5	246	155	63	21.06
CT 6	2878	555	19.28	16.94
CT 7	2853	330	11.57	19.27
CT 10	3622	498	13.75	9.29
CT 13	3180	239	7.5	6.06
CT 14	3471	450	12.96	8.94
CT 15	2722	219	8.05	13.18

Source: U.S. Census Bureau, 2000 U.S. Census

When examining income and housing issues, an assessment of the relationship between rental households and owner occupied households needs to be addressed in order to better understand the housing profile.

According to the 2000 U.S. Census there are 21,255 total housing units in the City of Enid; 18,955 of these units are occupied and 2,300 are vacant housing units. Of the 18,955 occupied housing Units, 12,738 are owner-occupied and 6,217 are renter-occupied. Table 8 below provides pertinent information regarding housing in the City of Enid.

Table 8 City of Enid: Housing Vacancy, Tenure, and Median Value / Rent Status

Year	Housing Units	Vacancy Rates	Owner-Occupied	Renter-Occupied	Median Home Value	Median Rent
1990	21,680	16.00%	65.60%	34.40%	\$38,400	\$243.00
2000	21,255	10.80%	67.20%	32.80%	\$59,200	\$437.00
Change	-2.00%	-5.20%	1.60%	-1.60%	54.20%	79.80%

Source: U.S. Census Bureau, 1990 and 2000 U.S. Census

The median rent changed drastically during the last ten years with a 79.80% increase. The median home value increased 54.20% during the last ten years. **Another interesting item of discussion is the decreasing number of housing units.** There have been more homes razed than built in the City of Enid in the last decade. This has caused citizens and leaders of the community to raise questions concerning the use of vacant lots that are found mainly in the eastern portion of the city. The City of Enid has recently engaged in discussion as to how the issue of vacant lots should be addressed.

Affordable Housing

The City of Enid has no Affordable Housing Program or Housing Authority. The City of Enid addresses housing issues in conjunction with the Community Development Support Association (CDSA) and the Enid Metropolitan Area Human Service Commission (EMAHSC). CDSA serves the city as a certified community action agency and EMAHSC provides support on housing issues through a Housing Council sub-committee.

The Community Development Support Association currently has multiple housing programs designed to improve access to affordable housing for low-income families and improve the quality of housing in order to better stabilize and revitalize neighborhoods. As a certified Community Housing Development Organization (CHoDO), CDSA is eligible for HUD HOME funding. The CDSA currently provides HUD certified housing counseling/advocacy for renters, homeowners, homebuyers, and homeless persons. CDSA also operates three transitional units. Two of the units are

located in a small complex owned by the agency, and the other unit is a 1/2 of a duplex that is owned and operated by CDSA.

HUD currently subsidizes low-income renters through the site certified Section 8 Program; as of May 2003, the City of Enid has five site certified Section 8 projects. There are currently 167 active recipients of Section 8 vouchers in Garfield County. Although no data was available on the percentage of the vouchers that were being used in the City of Enid, Oklahoma Housing Finance Agency commented that the greatest percentage of these vouchers are being used in the City of Enid.

Subsidized housing listing for the City of Enid:

- **Pine Manor**
1011 S. 30th St.
Enid, Oklahoma 73701
2000 U.S. Census Tract 6

Pine Manor consists of eight (8) separate two-story buildings and two (2) separate one-story buildings that were built in the 1970s. Of the fifty (50) apartment units in the complex, eight (8) of the units are one-bedroom, thirty-four (34) units are two-bedroom, and eight (8) units are three-bedroom.

- **Rolling Meadows**
3225 E. Randolph St.
Enid, Oklahoma 73701
2000 U.S. Census Tract 15

Rolling Meadows consists of seven (7) two-story buildings built in 1972. Of the fifty (50) apartment units there are twenty-one (21) one-bedroom units, twenty (20) two-bedroom units, five (5) three-bedroom units, and four (4) four-bedroom units.

- **Cherokee Terrace**
619 E. Maine St.
Enid, Oklahoma 73701
2000 U.S. Census Tract 7

Cherokee Terrace consists of two-story row houses consisting of eight (8) buildings with eighty (80) apartment units built in 1937 as part of a WPA project. Of the 80 apartment units there are sixteen (16) one-bedroom units, fifty-seven (57) two-bedroom units, and seven (7) three-bedroom units.

- **Meadows Point Apartments**
1225 S. Cleveland
Enid, Oklahoma 73703
2000 U.S. Census Tract 6

Meadows Point Apartments is a five story high rise consisting of ninety-eight (98) one-bedroom apartment units. Because Meadows Point Apartments are part of the HUD section 202 program, the 98 one-bedroom apartment units are reserved for low-income residents age 62 and older.

- **Civitan Homes**
1314 N. Garland Road
Enid, Oklahoma 73703
2000 U.S. Census Tract 10

Civitan Homes is Enid's newest site certified Section 8 project, constructed in 2002 using HUD section 202 funding. The Civitan Homes consists of forty-six (46) one-bedroom units in one-story buildings. Because the Civitan Homes were constructed utilizing section 202 funding, the 46 one-bedroom units are reserved for low-income residents age 62 and older.

operated under Section 42 of the LIHTC Program of the Internal Revenue Service. The section 42 LIHTC Tax Credit Program was created by Congress in 1986 as part of the Tax Reform Act and is administered by the Internal Revenue Service. The program is designed to facilitate the housing needs of moderate and middle-income families. The Section 42 of the LIHTC program is not subsidized housing nor is it affiliated with the Section 8 program, but rather it is a financing method that allows the owners of property to maintain affordable rents for moderate income families. The rental amount is not based on individual household income, but rather on pre-set income limits in the area.

Affordable housing listing for the City of Enid:

- **Pheasant Run Apartments:**
 6102 W. Chestnut
 Enid, Oklahoma 73703
 2000 U.S. Tract 10

Pheasant Run Apartments is an apartment complex consisting of ninety-six (96) units in six (6) two-story buildings. Of the 96 units there are sixteen (16) one-bedroom units, forty-eight (48) two-bedroom units, and thirty-two (32) three-bedroom units. Operating under section 42 of the LIHTC Program of the IRS, the 96 units in the complex are limited to persons whose income does not exceed the following amounts.

1 PERSON.....	\$18,480
2 PERSONS.....	\$21,120
3 PERSONS.....	\$23,760
4 PERSONS.....	\$26,400
5 PERSONS.....	\$28,500
6 PERSONS.....	\$30,600

The income restrictions placed upon occupants are subject to change every fiscal year in order to accommodate the changes in the economic conditions and cost of living in the City of Enid.

Pheasant Run Apartments was the first apartment complex constructed in the City of Enid since the 1980's.

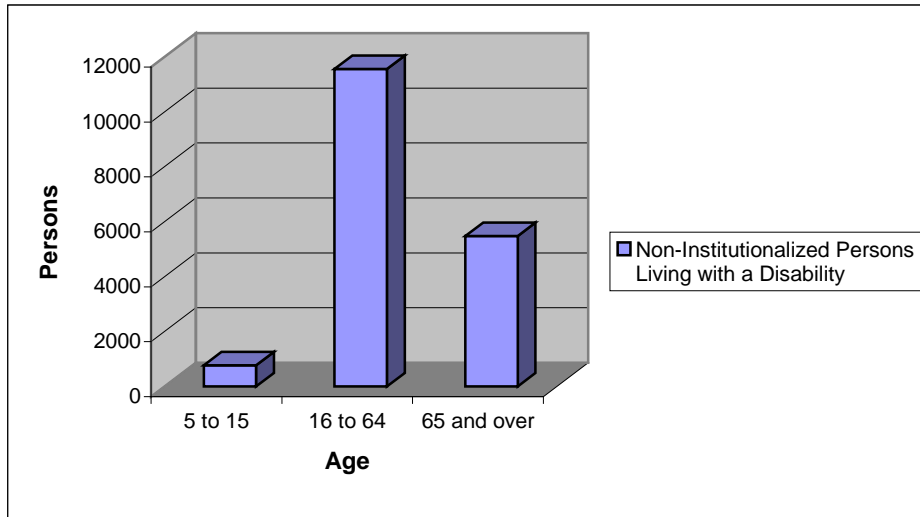
Besides the current subsidized and public housing stock, the City of Enid also has a Habitat for Humanity office. Habitat for Humanity is a non-profit ecumenical Christian organization dedicated to eliminating poverty housing worldwide. Habitat brings together people with resources and people in need to build simple, decent, affordable houses. The homes are sold to those in need at no profit, through no-interest loans. The Enid office of Habitat for

Humanity, since 1985, has placed twenty-five (25) families in twenty-one (21) homes. There have been twelve (12) homes refurbished, and eight (8) new homes built with a new home currently under construction. Habitat for Humanity currently has twelve (12) active mortgages.

Special Needs Population Profile

It is always difficult to determine the exact size and composition of the special needs population. According to the 2000 U.S. Census there are a total of 17,796 non-institutionalized disabled persons in the City of Enid.

Figure 5 City of Enid: Non-Institutionalized Persons Living with a Disability



Source: U.S. Census Bureau, 2000 U.S. Census

The greatest portion of non-institutionalized persons living with disabilities lies in the 16 to 64 years of age cohort, composing 64.94% of the total non-institutionalized disabled population in the City of Enid. While non-institutionalized disabled persons in the age cohort 65 and older compose 30.76%; leaving those of the age 5 to 15 make up 4.3% of the total non-institutionalized disabled population of 17,796.

In order to better understand the special needs population, we have further examined the three age cohorts as seen in Figure 5 and subdivided each age cohort to indicate the specific disability: sensory disability, physical disability, mental disability, or self-care disability. Figures 6 through 8 found in the appendix reflect our findings.

The Sandra Beasley Independent Living Center, a non-profit organization in the City of Enid, currently helps those living with disabilities to better handle independent living issues. The Center is designed to help provide access to programs and services that enable persons of all disabilities to realize and maintain an independent lifestyle. One of the most utilized services by the

Center's consumers is the Center's ability to remove architectural barriers from both rental and owner occupied homes. This service is funded by a grant from the Oklahoma Department of Rehabilitation Services, and provided directly from the Sandra Beasley Independent Living Center's staff and volunteers. Along with the ability to make home and apartment modifications according to current ADA standards, the Center also provides advocacy training, counseling, social/recreational activities, ADA consultation, and emergency intervention.

Employment and Transportation Network Profile

Table 9, found in the appendix, lists the major employers for the City of Enid, according to the Enid Chamber of Commerce.

The 2000 U.S. Census indicates there are 36,837 persons sixteen years of age and over in the City of Enid: 17,455 males and 19,382 females.

Of the male population age sixteen and older in the labor force, 12,503 (71.63% of total males) create the labor force while 4,952 (28.37%) are not a part of the labor force. The 2000 U.S. Census reported that 960 males were employed by the Armed Forces in the City of Enid. Males sixteen years of age and older in the Armed Forces comprise 7.68% of the total males over the age of sixteen in the labor force. There are currently 11,543 males making up the civilian labor force. Of the 11,543 males there were 10,827 employed, meaning 93.80% of the total male civilian labor force was employed at the time of the 2000 U.S. Census. 716 males (6.20%) age sixteen and older in the civilian labor force were unemployed.

Of the female population age sixteen and older in the labor force, 10,524 (54.3% of total females) create the labor force while 8,858 (45.70% of total females) are not a part of the labor force. The 2000 U.S. Census reported that 183 females were employed by the Armed Forces. Females sixteen years of age and older in the Armed Forces comprise 1.74% of the total females in the labor force. There are currently 10,341 females making up the civilian labor force. Of the 10,341 females there were 9,853 employed, meaning that 95.28% of the total female civilian labor force was employed at the time of the 2000 U.S. Census. 488 females (4.72 %) age sixteen and older in the civilian labor force were unemployed.

Of the 21,426 male and females age sixteen and older in the labor force 17,468 drove a private automobile, 2,730 carpoled in an automobile, 72 persons utilized public transportation, 20 used a motorcycle, 139 used a bicycle, 455 walked, and 63 used some other means of transportation to get to work.

The travel time to work for those 16 year of age in the labor force can be found in the appendix under Figure 9. It is apparent that persons in the labor force driving 10 to 14 minutes compose the greatest cohort with 6,853 persons. The next largest cohort of persons, commute only 5 to 9 minutes.

SECTION D – Evaluation of Current Fair Housing Legal Status

The Federal Fair Housing Act guarantees fair housing opportunity to all citizens in the City of Enid. If a person believes he or she is a victim of housing discrimination, they have the right to file a fair housing complaint. Currently, an alleged violation of federal fair housing laws within Enid may ultimately be filed with:

- HUD Office of Fair Housing and Equal Opportunity (FHEO), Oklahoma City, OK

HUD is authorized under the Fair Housing Act to investigate and process housing discrimination complaints that also may be prosecuted by the Department of Justice. A fair housing complaint may be filed directly with the OKC HUD Office of Fair Housing and Equal Opportunity by phone (405/553-7435) or e-mail (www.hud.gov). Fair housing laws in the State are certified “substantially equivalent” to the Fair Housing Act.

Other avenues of reporting potential housing discrimination in the city include notifying the following organizations:

- CDSA (Community Development Support Association)
- Community Relations Commission (City of Enid)
- Enid Metropolitan Area Human Service Commission, Housing Council
- Enid Metro Association of Realtors, Inc.
- Oklahoma Human Rights Commission
- Office of Comptroller of Currency

CDSA has the ability to assist with discrimination claims and refers complaints to the Oklahoma City HUD Office of Fair Housing and Equal Opportunity. Most fair housing problems made known to CDSA are resolved through mediation alone. CDSA offers landlord/tenant mediation regularly as part of its function as a HUD certified housing counseling agency.

The **Community Relations Commission** has the responsibility and authority according to City Ordinances to receive, investigate, and seek the satisfactory adjustment of complaints that charge housing discriminatory practices. The Commission acts as a mediator, offering suggestions to alleviate the alleged violation. The Commission studies and investigates by means of public hearing or otherwise, any condition having an adverse effect on inter-group relations in the City and study the problems of prejudice, tolerance, bigotry, and discrimination as they effect the public safety and general welfare of the City.

The **Enid Metropolitan Housing Council** is an established advisory sub-committee of the Enid Metropolitan Area Human Service Commission. The Housing Council, through its connection to the Metro Commission, provides a research, public education, and information gathering function for the City of Enid. It provides a conduit for the flow of information about housing in the Enid area and encourages solutions to housing problems. Members of the Council are comprised from several diverse groups – the private sector with mortgage lenders and real estate professionals, the community sector through several human service providers, community action agency, and community leaders, as well as government representatives by nature of their employment with the City from Code Enforcement, Fire Department, and Community Development.

The **Enid Metro Association of Realtors, Inc.** provides and requires fair housing training for all joining members. The Association has the capacity to receive alleged violations of fair housing laws and is responsible for reporting such complaints to the National Association of Realtors (NAR). The Executive Officer confirmed that no discrimination complaints had been filed during her 15 years of employment with the Association.

The **Oklahoma Human Rights Commission** is a state agency that was created in 1963 to "work toward removing friction, eliminating discrimination, and promoting unity and understanding among all the people of Oklahoma." This mandate is realized through the implementation of the provisions of two state statutes. The Oklahoma Human Rights Commission consists of a nine-person board, which establishes policy, sets goals, and approves programs and projects related to eliminating discrimination and improving inter-group relations. The Commission is also empowered to conduct public hearings on complaints of citizens alleging discrimination.

The **Office of the Comptroller of the Currency (OCC)** charters, regulates, and supervises national banks to ensure a safe, sound, and competitive banking system that supports the citizens, communities, and economy of the United States. One of the main objections of the OCC is to ensure fair and equal access to financial services for all Americans. Financial institutions in the City of Enid who are required to report Home Mortgage Disclosure Act (HMDA) information to the OCC are analyzed for compliance with the Community Reinvestment Act among other consumer banking laws.

1. Fair Housing Discrimination Complaints

In Oklahoma, if any person believes they have been the victim of housing discrimination under the Fair Housing Act, a complaint may be filed directly with the Oklahoma City HUD Office of Fair Housing and Equal Opportunity (FHEO) or the City of Enid Community Relations Commission. Fair housing

complaint data was requested from both agencies to identify if any patterns or practices of housing discrimination exist within the City of Enid. Currently no complaints of fair housing discrimination under the Fair Housing Act are under review.

a. Fair Housing Complaints Filed with HUD

Fair housing discrimination complaint data requested from HUD under the Freedom of Information Act was provided in a report prepared by the Southwest Office of Fair Housing and Opportunity. The report included fair housing complaint activity in Enid from January 1, 1997 to the present. Only one case was filed during the last six years.

- Case Number: 06-97-0356-8; Basis: Race; Type: No Cause Determination

b. Fair Housing Complaints Filed with Community Relations Committee

Fair housing discrimination complaint data requested from the Community Relations Committee was provided in a report. The report included fair housing complaint activity in Enid from January 1, 1997 to the present. Two cases were filed during the last six years.

- Date Complaint Filed: February 5, 1999; Basis: Race; Type: Yet to be Determined
- Date Complaint Filed: October 8, 2002; Basis: Race; Type: No Cause Determination

2. Fair Housing Discrimination Suits

According to the report furnished by the Southwest Office of Fair Housing and Opportunity, there have not been any housing discrimination lawsuits in Enid from January 1, 1997 to the present. Information regarding discrimination lawsuits, both public and private, indicates there are not any fair housing discrimination suits pending.

3. Local Fair Housing Discrimination Data

Fair housing discrimination data is limited due to a low volume of housing discrimination complaints filed during the last six years in the City of Enid. The City of Enid, the Community Development Support Association (CDSA) and other agencies address issues of housing discrimination effectively at the local level. There was no evidence of historical patterns or practices of

housing discrimination identified from available data provided by local agencies or organizations.

SECTION E – Identification of Fair Lending Practices and Opportunity

The ability of protected groups to obtain financing to maintain, purchase, build or invest in affordable housing is important to providing Fair Housing opportunity. In the City of Enid, the activities and outreach programs of financial institutions clearly demonstrate a strong professional adherence to insure fair lending practices. As part of the Analysis of Impediments to Fair Housing Choice study, interviews were conducted to obtain information about lending policies, procedures, and programs administered by the financial community as it relates to Fair Housing.

Four (4) financial institutions were contacted and all indicated having fair housing awareness programs to eliminate minority status as a consideration in financing housing. All banks provided hard copy information on policies and procedures related to fair housing. Each financial institution advertises the fair housing and equal opportunity (FHEO) logo and clause in an appropriate manner.

1. Home Mortgage Disclosure Act

a. Background and Purpose

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Board. Under HMDA Regulation C, some financial institutions located in metropolitan statistical areas that make home mortgage loans are required to publicly disclose the location of their home purchase, refinance, and improvement loans. The Federal Financial Institutions Examination Council (FFIEC) compiles the data and makes summaries of the HMDA data available to the public. This information is used by community groups, federal agencies, and others to review financial institution fair lending practices and to help regulators enforce fair lending laws.

Congress authorized the Act after finding

...that some depository institutions have sometimes contributed to the decline of certain demographic areas by their failure... to provide adequate home financing to qualified applicants on reasonable terms and conditions.

...The purpose of this title is to provide the citizens and public officials... with sufficient information to enable them to determine whether depository institutions are

filling their obligations to serve the housing needs of the communities and neighborhoods in which they are located and to assist public officials in their determination of the distribution of public sector investments in a manner designed to improve the private investment environment.

Data collected under HMDA is used to help the public determine if lending institutions are meeting the housing credit needs of their communities. HMDA regulations apply to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions involved in home credit opportunity. All federally insured or “conventional” home purchase loans and home improvement loans, which are used to repair, rehabilitate, or remodel a residence are included under HMDA regulations. HMDA reports are used to identify if discriminatory lending patterns are present within the community. Financial institutions subject to HMDA must also disclose the gender, race, and income of loan applicants.

b. Home Mortgage Disclosure for the City of Enid

The most current HMDA data reported for the City of Enid is available for the year 2001. **It should be noted the census tracts used for identification in this report are based on the 1990 U.S. Census and are not comparable with previously discussed census tracts**, which were adjusted during the 2000 U.S. Census. The following tables were created from information found in Aggregate Table 1 of the 2001 HMDA report for Enid, MSA 2340.

Table 10 displays the total number of loans originated (loan applications) and loan amount in each census tract based on loan type.

Table 10 Enid, MSA: Total Loans Originated and Amount by Census Tract

Census Tract	HOME PURCHASE LOANS				Home Improvement Loans		Loans on Dwellings for 5 or More Families	
	FHA, FSA/RHS & VA		Conventional		Number	\$000s	Number	\$000s
	Number	\$000s	Number	\$000s				
1	12	579	48	1,622	13	153	0	0
2	10	644	31	2,325	15	195	0	0
3	86	7,744	265	24,193	67	1,241	2	569
4	15	703	44	2,167	12	115	1	104
5	36	2,615	77	5,330	27	451	0	0
6	20	1,006	28	1,187	17	100	2	328
7	9	297	33	806	19	112	1	250
8	20	834	39	1,516	19	395	0	0
9	2	268	15	920	15	256	0	0
10	18	1,558	57	5,012	23	535	0	0
11	7	426	27	1,911	20	173	0	0

12	6	324	29	1,641	15	174	0	0
TOTAL	241	16,998	693	48,630	262	3,900	6	1,251

Source: 2001 HMDA Report, Aggregate Table 1, MSA 2340, Enid, OK

During 2001, a total of 934 home purchase loans (FHA, FSA/RHS & VA and Conventional) were originated in the City of Enid. These 934 originated loans amounted to \$65,628,000. A total of 262 home improvement loans amounting to \$3,900,000 were also originated along with 6 loans on dwellings for 5 or more families worth \$1,251,000.

The data most worthy of examination, however, is not the number of loans originated, but the number of loans denied. Loan denial data has the potential to be used in determining discriminatory investment practices.

A total of 293 home purchase loans amounting to \$14,676,000 were denied in 2001. These 293 denials account for 31.37% of all home purchase loans originated. The denial of home improvement loans rested at 58.39%. These 153 loans had a value of \$2,155,000. It should be noted that no loans on dwellings for 5 or more families were denied.

Table 11 provides the total number of loans denied and loan amount per census tract based on loan type.

Table 11 Enid, MSA: Total Loans Denied and Amount by Census Tract

Census Tract	HOME PURCHASE LOANS				Home Improvement Loans		Loans on Dwellings for 5 or More Families	
	FHA, FSA/RHS & VA		Conventional		Number	\$000s	Number	\$000s
	Number	\$000s	Number	\$000s	Number	\$000s	Number	\$000s
1	1	54	33	1,323	11	136	0	0
2	3	191	9	522	8	76	0	0
3	10	636	50	3,904	27	428	0	0
4	4	216	21	810	14	165	0	0
5	6	351	21	1,170	18	306	0	0
6	6	220	11	574	15	185	0	0
7	1	27	37	1,030	25	272	0	0
8	3	109	15	470	16	180	0	0
9	0	0	6	288	3	57	0	0
10	3	115	18	730	7	167	0	0
11	3	191	19	1,060	5	96	0	0
12	5	243	8	442	4	87	0	0
TOTAL	45	2,353	248	12,323	153	2,155	0	0

Source: 2001 HMDA Report, Aggregate Table 1, MSA 2340, Enid, OK

2. Community Reinvestment Act

The Federal Community Reinvestment Act (CRA) is a law enacted in 1997 to combat redlining. The Act states that banks and savings institutions must take affirmative steps to help meet the credit needs of the entire community they are chartered to serve, including low and moderate income areas. One of the most important features of CRA is that the opportunity exists for citizens to file complaints about a financial institution's practices. CRA programs specify affirmative steps the institution should take to provide lending opportunities in low and moderate-income neighborhoods. Within the City, the Community Relations Commission has the responsibility and authority to receive, investigate, and seek the satisfactory adjustment of complaints that charge discriminatory practices.

3. Enid Metro Association of Realtors, Inc.

No evidence of discrimination and real estate practices, such as steering or blockbusting were found during the interview at the Enid Metro Association of Realtors, Inc. (Steering is defined as a form of discrimination against minority homebuyers in which minorities and whites are provided information about houses for sale in systematically different geographic areas. Blockbusting is essentially profiteering by inducing property owners to sell hastily and often at a loss by appeals to fears of depressed values because of threatened minority encroachment and then reselling at inflated prices.)

The real estate industry is sensitive to the issues of discrimination and has regulatory policies and practices that prohibit discrimination in addition to the Fair Housing Act. Examples of such policies and practices are listed below.

The Enid Metro Association of Realtors, Inc. provides training/education courses to joining licensed realtors. Currently there are 108 members. Information provided is compiled in an Equal Housing Opportunity packet. This packet contains information such as a Fair Housing Office Policy Checklist, Fair Housing Tips for Sales Associates and Brokers, and a copy of the Prospect Equal Service Report prepared by the National Association of Realtors®.

A Fair Housing advertising word and phrase list that outlines acceptable and non-acceptable terminology is available and provided for Enid realtor members during training/education courses.

Pamphlets created by the National Association of Realtors® entitled “What Everyone Should Know About Equal Opportunity in Housing” are available in English and Spanish.

4. HUD Approved Counseling Agencies

Financial counseling with regard to fair housing opportunity is available for all persons within the City of Enid. Programs relating to financial and debt management and fair housing are presented for renters and first-time homebuyers. One common issue in housing choice is the amount of paperwork required to apply for many housing programs. For persons with language barriers and/or lack of education, this is an extremely difficult problem that impacts housing opportunity. The following HUD approved agency provides counseling services to assist in renting or purchasing a home in the City of Enid.

- **CDSA (Community Development Support Association)**

Types of Counseling/Advocacy: General Homebuyer Education Workshop, Foreclosure Avoidance, Lead-Based Paint and Fair Housing Programs, Local Renters Rights Informative Commercials on Local Community Access Channel

Other Services Provided: Owner-Occupied Rehabilitation Program, Emergency Repair Program, Weatherization Program

SECTION F – Recommendation for Fair Housing Choice Issues

This section provides information and recommendations on areas identified, which may present potential impediments within the City of Enid. The data reviewed includes a broad spectrum of public and private agencies analyzed for their present policies and initiatives regarding fair housing choice for all persons. Initiatives utilized by these agencies were also analyzed to assess their effectiveness in fair housing opportunity. The purpose of this section is to initiate a dialogue about fair housing issues.

As part of the preparation of this report, efforts were made to contact representatives from the private and public sectors in the City of Enid that may directly or indirectly influence fair housing opportunities. The initial contact was either by phone or personal interview as part of an Analysis of Impediments to Fair Housing Choice report for the City of Enid. A list of all representatives contacted and the result of the initial contact is included in the appendix. If the contact agreed to an interview, information was given stating that the interviews were to identify any potential concerns or problems about fair housing opportunity within the City.

Therefore, each representative knew in advance that the interview was being conducted on behalf of the City of Enid and the purpose of the interview. In most cases, during the interviews, the nature of the responses led to additional questions and discussion. The open nature of the process broadened the scope of the interviews and allowed for information not anticipated.

The following three (3) topics are considered impediments to fair housing choice in the City of Enid. As previously stated, the background, definition of issues and recommendations are presented with the intention to educate the reader how to remedy each impediment.

1. Need for Fair Housing Awareness Education and Action

a. Background

Virtually all entities that assist in providing housing are regulated and cannot discriminate against the protected classes of the Fair Housing Act. There was no evidence of discrimination of protected classes obtained from interviews within the City of Enid real estate industry. None of the apartment complexes, realtors, and active community members contacted were aware of any cases of discrimination.

b. Education and Awareness

Since virtually all entities that assist in providing housing are regulated and cannot legally discriminate based on minority status, any discrimination that occurs must be covert. With numerous laws and ordinances in place to prevent discrimination in housing, it appears the next step is to approach the problem of discrimination at its root cause. Because prejudice, by definition, is based on insufficient or biased information, one logical remedy is education and public awareness.

c. Recommendation

Recommendations made for actions that could enlighten public awareness and enhance collaboration between public and private entities include:

- Initiate a fair housing outreach program and education campaign initiated by City staff with representatives from apartment complexes along with property managers.
- Improve communication, networking, and knowledge base between civic, business, civil rights, and municipal government groups.
- Publicize the CDSA (Community Development Support Association) as a public resource for information in regards to housing issues in the City of Enid.
- Educate the public and civic, business, civil rights, and municipal government groups concerning avenues of housing discrimination reporting.
- Continue fair housing training programs sponsored by the Enid Metro Association of Realtors, Inc.
- Maintain Homebuyer Education Workshops sponsored by CDSA in conjunction with participating financial agencies along with other housing related workshops and advocacy activities.

2. Display and Use of Fair Housing and Equal Opportunity (FHEO) Logo and Clause

a. Background

Advertising as a discriminatory process is never exempt under the Federal Fair Housing Act. However, the Oklahoma City HUD Office of Fair Housing and Equal Opportunity (FHEO) stated that it is not a legal requirement to use the fair housing clause in advertising if the apartment complex or property does not have ties to the federal government. It was also stated that even if there are no federal government financial ties to the project, the “law of the land” still holds.

The standard statement for properties using the FHEO wording is as follows.

“All real estate advertised herein is subject to the Federal Fair Housing Act which makes it illegal to advertise any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make any such preference, limitation, or discrimination. We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.”

b. Advertising and Display of FHEO Logo

Within the City of Enid real estate industry, apartment complexes and property managers use a variation of the following types of printed advertising.

- *The Enid News & Eagle* Newspaper
- Southwestern Bell Enid Area Yellow Pages
- Enid Visitor’s & Newcomers Guide
- Independent Real Estate Agency Home Buying Guides

As part of the Analysis of Impediments report, review of the local print media has found the display of the FHEO logo and FHEO statement in the following real estate advertisements.

The Enid News & Eagle Newspaper

The policy of *The Enid News & Eagle* Newspaper regarding classified ads is:

The Enid News & Eagle will not knowingly accept ads that discriminate on the basis of race, sex, religion, or national origin. *The Enid News & Eagle* will not accept responsibility beyond the cost of the ad.

In the classified advertisements under Section 163 – Real Estate, the FHEO logo and clause is inserted that reads:

“All real estate advertised herein is subject to the Federal Fair Housing Act which makes it illegal to advertise any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial

status, or national origin, or intention to make any such preference, limitation, or discrimination. We will not knowingly accept any advertising for real estate, which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.”

Southwestern Bell Enid Area Yellow Pages

Apartment rental and real estate portions of the yellow pages include an insert of the FHEO logo and clause. The clause reads:

“All listings or advertisements for the sale or rental of dwellings published in this directory are subject to the federal Fair Housing Act, which makes it unlawful to make or publish any such advertisement that indicates any preference, limitation, or discrimination based on race, color, religion, sex, national origin, handicap, or familial status, or an intention to make any such preference, limitation, or discrimination. Southwestern Bell Yellow Pages, Inc., will not knowingly accept any advertising for the sale or rental of a dwelling which indicates any preference, limitation, or discrimination.”

Enid Visitor’s & Newcomers Guide

Eagle Marketing publishes the Enid Visitor’s & Newcomers Guide in conjunction with the Enid Convention & Visitors Bureau. The Apartment Guide section of the guide did not include the FHEO logo or clause. However, a few individual real estate agency ads found in the guide did include the FHEO logo.

Independent Real Estate Agency Home Buying Guides

Various independently published home buying guides were found to have included the FHEO logo but lacked the FHEO clause.

A representative sample of eight (8) apartment complexes and one (1) property management firm within the City of Enid were interviewed on site during the preparation of the Analysis of Impediments to Fair Housing Choice report. During site visits to the apartment complexes offices and property management firm, it was found that the FHEO logo was prominently displayed with four (4) exceptions. One apartment complex posted the logo in a side administrative office rather than in the main reception area and the remaining three complexes/firm lacked visible logos altogether.

Roughly half of the apartment complexes visited had the FHEO logo/clause inserted in their applications and leases.

c. Recommendation

It is recommended that City staff pursue a fair housing outreach program and education campaign with representatives from apartment complexes along with property managers. For example, fair housing posters are available through the HUD Office of Fair Housing and Equal Opportunity (FHEO) in Oklahoma City. These posters contain fair housing information and could be posted for the public to view at sites currently lacking the FHEO logo and clause.

3. Public Transportation Facilities in Enid

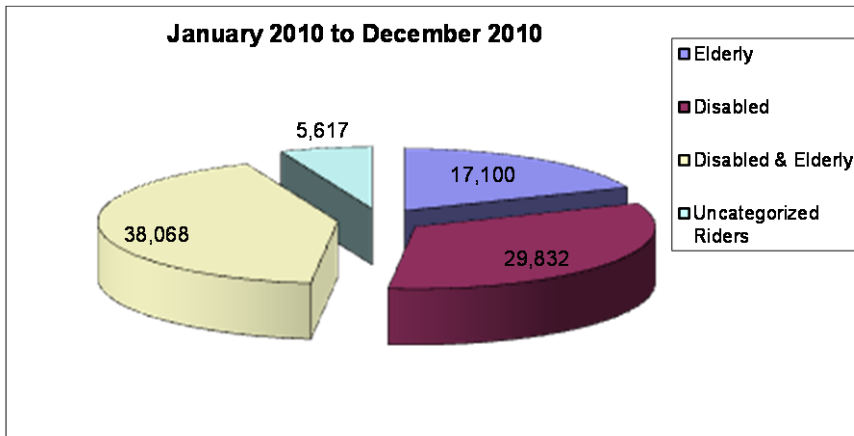
a. Background

The Transfer is the sole public transportation service for Enid residents; the private taxi service in Enid has recently ceased operations. The Enid Transfer has been serving residents since 1984 and serves all four hundred miles of roads within the Enid city limits. The Transfer is a demand responsive shared ride paratransit service, with no fixed routes. Service hours are from 6:00 a.m. to 10:00 p.m. Monday through Saturday. The Enid Transfer offers no service hours on Sunday. The Transfer service fleet includes twelve (12) passenger buses, all of which have lift equipment and raised roofs that permit independent boarding for disabled residents.

A one-way fare on the Transfer is \$2.50, with a 50% discount offered to children under 12 years of age, persons over 60 years of age, and disabled riders. There are no vouchers available for low-income earning riders. Riders are able to purchase a "Flash Pass" for \$50.00, which allows holders of the "Flash Pass" to ride an unlimited amount of trips for thirty days. The "Flash Pass" is available to public school students for \$20.00 and remains valid for thirty days.

Ridership figures for the Transfer were provided from the Enid Public Transportation Authority's General Manager, Mike Danahy for the period of: January 2002 through December 2002. Figure 9 on the following page portrays these ridership figures.

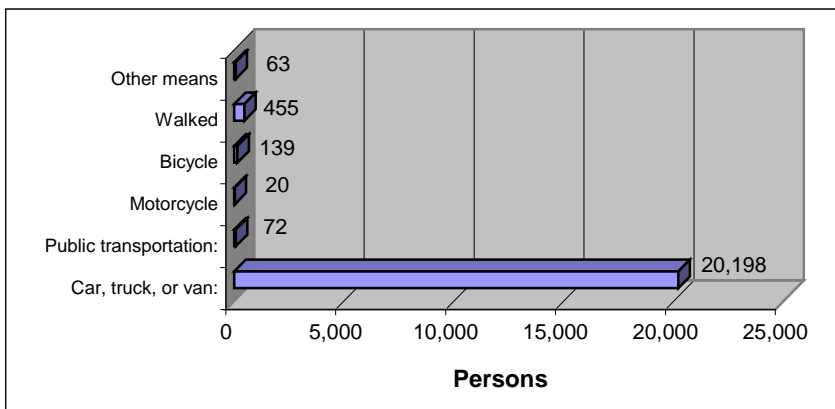
Figure 10 Enid Public Transportation: Ridership of Enid Transfer



Source: Interview with Enid Public Transportation Authority's General Manager, Mike Danahy. April 07 & April 10, 2003.

The majority of Enid residents (97%) use private means of transportation to commute to work, according to the 2000 US Census. Of the 21,426 persons over the age of 16 in the Enid labor force, the means of transportation was reported in the 2000 US Census as follows:

Figure 11 City of Enid: Means of Transportation to Commute to Work



Source: U.S. Census Bureau, 2000 US Census

The Enid Transfer is funded in part by a Non-Urbanized Formula Grant, under the Federal Transit Administration's Section 5311. Communities with a population of less than 50,000 are eligible to receive funds. This grant offers federal assistance to local sponsors wishing to provide rural transportation service by reimbursing up to 80% of the sponsoring agency's capital and administrative expenses, and up to 50% of the net operating expenses. The City of Enid matches the Federal Transit Administration's Section 5311 grant in hard money.

Without public transportation, job opportunities would be limited to those with private means of transportation. With the Enid Transfer being a demand

responsive shared ride paratransit service, job opportunities and services should not be limited to those with private means of transportation.

b. Efficiency of Public Service and Aging Fleet

The Enid Transfer offers a needed public service for those without private means of transportation. However, while conducting interviews with social service agencies, apartment management personnel, and citizens, the efficiency of the Enid Transfer's service has been brought into question. While the Enid Transfer office attempts to collect a person(s) within 45 minutes after they have placed a demand call, it was brought to the Staff's attention while conducting interviews that it can often take as long as two (2) hours for the Enid Transfer to respond.

The other issue brought to our attention concerning the Enid Transfer was the condition of the fleet. In an interview with Mike Danahy, the General Manager of the Enid Public Transportation Authority, poor condition of the fleet was identified as being one of the most pressing issues faced by the Enid Transfer offices. During an interview with a social service provider whose clients utilize the public service, it was made known to our Staff that although the Enid Transfer has twelve (12) passenger busses in their fleet, at times there might be as few as two (2) passenger buses in operation due to broken down busses and overall scheduling of the Enid Transfer's driving staff.

With these issues being identified, our Staff has come to the conclusion that due to likely inefficiencies of the Enid Transfer service, persons without access to a private vehicle have the potential of being limited to housing and employment choices.

c. Recommendation

- Aggressively seek grants and other federal and private monies to improve the conditions of Enid Transfer's fleet of operation vehicles.
- Initiate an examination, conducted by management of the Enid Public Transportation Authority, to identify successful public transportation systems in urbanized areas with similar population, transportation needs, and development patterns to seek a means of improving the efficiency of the Enid Transfer's operations.
- Survey Enid Transfer clients to understand how to better meet the transportation needs of persons utilizing the public service.
- Examine the potentials of automated routing and scheduling software in order to increase the cost efficiency of service.

SECTION G – Local Efforts that Promote or Enhance Fair Housing

Vance Air Force Base

The City of Enid is home to Vance AFB. Located on the southwest edge of Enid, Vance AFB remains to be Enid's largest employer with an economic impact of \$187 million annually on Northwest Oklahoma. Vance AFB is the third busiest airport in the nation with 5 runways, 230 aircraft, and 384 buildings. Vance AFB, as part of the Air Education and Training Command primary mission, has the responsibility of training over 430 military pilots every year. In addition to training Air Force students, Vance AFB also trains Navy and Marine student pilots under a Joint Specialized Undergraduate Training Program. An on-base employee profile is as follows: there are 1,388 active duty, Air Force Reserve, and Air National Guard Students; 1,219 active duty military dependents; 1,175 contract employees; 181 Department of Defense employees; 15 private sector employees.

To deal with housing issues of personnel, Vance AFB operates a Housing Referral office. With on-base housing consisting of 230 units, usually filled to capacity, new flight students often seek rental units in the City of Enid. The Housing Referral office serves to help locate affordable housing for incoming active duty students, working closely with local apartment management and landlords of vacant single-family rental occupied units. The staff of the Vance AFB Housing Referral office is able to help and meet the needs of the Base's transitory population. The Housing Referral office has not had any problems finding housing with short -term leases, but instead locating affordable housing for incoming flight students is often one of the staff's most difficult tasks. There have been no complaints of discrimination to the Housing Referral office of Vance AFB.

Advance Food Company

Advance is the City of Enid's second largest employer, with approximately 1,200 employees. The company has two production facilities and a 125,000 square foot distribution center in Enid. Last year, total payroll was approximately \$30 million, not including benefits, which add significantly to that figure.

One of the most pertinent benefits in relation to housing issues in the City of Enid is a first time homebuyers Housing Benefit Plan Loan program. This program is eligible to full-time employees whom have been an active employee for at least one year and are in good standing with the company, When an Advance employee utilizes the Housing Benefit Plan Loan program, the applicant is eligible for up to \$2,500 in a forgivable loan from Advance to be used as a down payment for home ownership, with the eligible employee required to contribute at the least 1% of the purchase price toward the down

payment and/or closing costs. Advance will forgive all principal of the loan if the employee remains an eligible borrower, satisfies the loan maturity date, and completes three years of continuous employment with Advance Food Company from the house closing date. All eligible employees seeking a Housing Benefit Loan are required to attend a Buyer Education program, which is provided by CDSA (Community Development Support Association).

Financial Institutions

Financial Institutions in the City of Enid are helping to fill gaps in housing needs of all persons residing in Garfield County and the City of Enid. After a sampling of financial institutions, it was determined by the Staff that the banks were working diligently to go beyond HUD and Home Mortgage Disclosure Act (HMDA) regulations, and actively promoting fair and affordable housing in the City of Enid. All financial institutions interviewed had posted, in a visible area, HUD and HMDA posters that explicate means of reporting a housing discrimination complaint. The staff of the mortgage lending offices of the financial institutions we visited all had adequate continuous educational training regarding fair housing issues. Beyond Fair Housing Awareness Education, many of the banks had a variety of programs tailored for first time homebuyers and some worked in conjunction with CDSA to help facilitate workshops on home buying and fair housing issues.

Central National Bank: CNB currently has a low and low-to-moderate income housing loan program. The program is not limited to first time homeowners, but is available for 1 to 4 family owner occupied houses. CNB has targeted 1990 Census Tracts 1,6,7, and 8 as the area where the reinvestment must occur, and the sale price of the houses cannot be above \$40,000. Persons that chose this program are given longer loan terms, usually 20 years. The bank requires less documentation than a conventional loan, there is flexibility in underwriting, and the closing costs are less. By choosing this loan, homebuyers are offered competitive interest rates, and 90% loan to value without added PMI insurance.

Currently, CNB's Vice President of Mortgage Lending also serves on the Enid Metropolitan Area Human Service Commission and on the Community Development Support Association board (CDSA).

Bank of Oklahoma: BOK has allocated \$4,000,000 (as of January 06, 2002) to be used for mortgage lending for low and low-to-moderate income first time homebuyers. The program offers homebuyers a 30 year fixed interest rate of 6.55%. BOK has also participated in giving homebuyer education classes for the Community Development Support Association (CDSA).

Habitat for Humanity

The City of Enid also currently has an active Habitat for Humanity office. Habitat for Humanity is a non-profit ecumenical Christian organization dedicated to eliminating poverty housing worldwide. Habitat brings together people with resources and people in need to build simple, decent, affordable houses. The homes are sold to those in need at no profit, through no-interest loans. Since 1985, the Enid office of Habitat for Humanity has placed twenty-five (25) families in twenty-one (21) homes. There have been twelve (12) homes refurbished, and eight (8) new homes built with a new home currently under construction. Habitat for Humanity currently has twelve (12) active mortgages.

SECTION H – Conclusions and Recommendations

Fair housing is a complex issue that requires constant monitoring to remain proactive. Some actions that appear to enlarge choice opportunities for one segment of the population, potentially diminish choice for others. Some factors, which limit the choice of housing opportunities, are not amenable on a local level without community-wide participation. Additional measures can be implemented in the City of Enid to create fair housing opportunity choice for individuals or families in every type of protected class.

The following recommendations are presented to maintain quality programming and to increase, where applicable, fair housing in the City of Enid.

Fair Lending Practices and Opportunity

- Commendation of the banking community which extends the CRA process by participating in local level Homebuyers Seminars and providing mortgage lending programs for low and low-to-moderate income first time homebuyers.
- Consider compilation and examination of HMDA (Home Mortgage Disclosure Act) reports provided by local financial institutions to further ensure fair lending activity throughout the city.

Use of Fair Housing and Equal Opportunity (FHEO) Logo and Clause

- It is recommended that the City of Enid staff pursue a fair housing outreach program and education campaign with representatives from apartment complexes along with property managers. Especially helpful would be provision of FHEO posters available through the Oklahoma City HUD Office of Fair Housing and Equal Opportunity.

Fair Housing Awareness and Education

- Suggestions made for actions that could help enlighten public awareness and enhance collaboration between public and private entities include:
 - Improving communication, networking, and knowledge base between civic, business, civil rights, and municipal government groups.
 - Educating the public and municipal government, civic, business, and civil rights groups concerning avenues of housing discrimination reporting.

- Maintaining Homebuyer Education Workshops sponsored by CDSA in conjunction with participating financial agencies along with other housing related workshops and advocacy activities.

Enid Metro Association of Realtors, Inc. Practices

- Continuation of fair housing training programs sponsored for the membership base of 108 members as required by the State of Oklahoma.

Public Transportation

- It is recommended that the City of Enid (Enid Public Transportation Authority) seek grants and other federal and private monies to improve the conditions of Enid Transfer's fleet of operation vehicles.
- The Enid Public Transportation Authority should identify successful public transportation systems in urbanized areas with similar population, transportation needs, and development patterns to seek a means of improving the efficiency of the Transfer's operations.
- Surveying Enid Transfer clients could provide better understanding as to how the transportation needs of persons utilizing the public service could be met more efficiently.

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- Concentration of Poverty by Census Tract
- Concentration of Single Family Head of Household with Children by Census Tract

Section K -- Appendix

Community Information Sources

a. Private Sector

Financial Institutions:

- Bank of America
- Security National Bank
- Central National Bank
- Bank of Oklahoma

Apartment Complexes:

- Sandpiper Apartments
- La Fonda Apartments
- Winchester West Apartments

Property Managers:

- Enid Property Management Company, Inc.

Realtors:

- Enid Metropolitan Association of Realtors, Inc.
- Re-Max Realtors
- Century 21 Real Estate
- Coldwell Banker

Businesses:

- Advance Food Company

b. Public Sector

City of Enid:

- Community Development
- Enid Chamber of Commerce
- City Attorney
- Community Relations Commission
- Enid Public Transportation Authority

Garfield County:

- Garfield County Assessor
- Northern Oklahoma Development Authority (NODA)

State of Oklahoma:

- Oklahoma Human Rights Commission
- Oklahoma Department of Commerce

U.S. Department of Housing and Urban Development

- FHEO Program Operations and Compliance Center, Oklahoma City, OK

Community Action Agency / Advocacy Groups:

- Community Development Support Association (CDSA)
- Hope Outreach
- Sandra Beasley Independent Living Center
- Eldercare (DHS)
- Habitat for Humanity

Affordable Housing:

- Cherokee Terrace
- Pheasant Run
- Meadows Point Apartments
- Civitan Homes
- Rolling Meadows

Education:

- Northern Oklahoma College – Enid Campus

Churches:

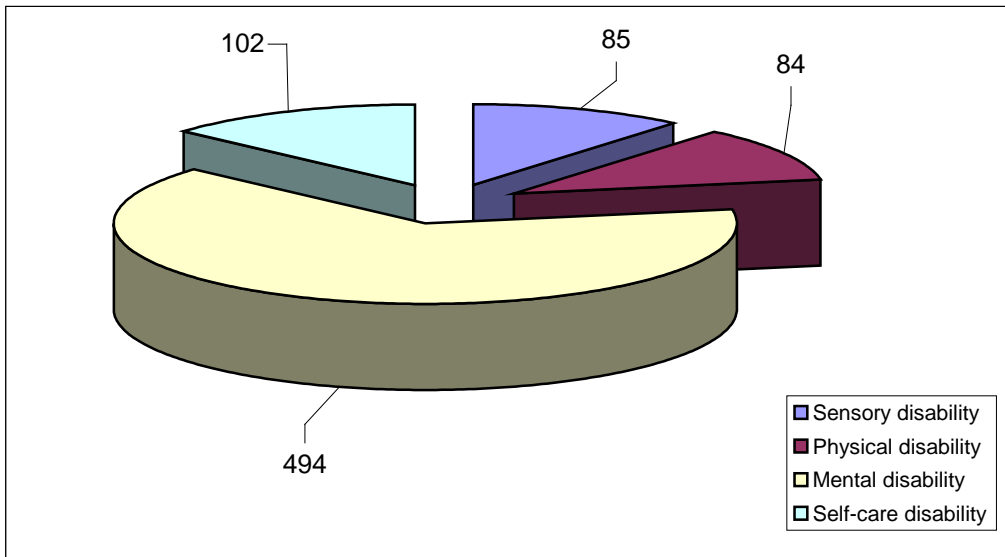
- First Baptist Church
- Westside Church of God and Christ

Table 9 City of Enid: List of Major Employers

Employer	Census Tract	Industry	Number of Employees
Vance Air Force Base	5	Air Force Base	1,529
Advance Food Company	1	Breaded Meat Products	1,018
DynCorp	5	Aircraft/Base Maintenance	960
Enid Board of Education	1	Public Education	905
Integriss Bass Health Center	6	Regional Health Center	890
St. Mary's Health Center	7	Regional Health Center	643
StarTek, Inc.	1	In Bound Call Center	500
NORCE	2	Institutional Care	467
City of Enid	6	City Offices	465
United American Advertising	13	Telemarketing	310
Central Machine & Tool	2	Foundry Machine	240
Blue Dolphin Nursing Facilities	15	Nursing Home	210
Continental Resources	1	Oil and Gas	200
Garfield County	1	County Offices	170
George E. Failing	10	Drilling	160
Luckinbill, Inc.	7	Construction, AC & Heating	150
United Methodist Home	14	Nursing Home	150
Uni-Steel, Metals USA	1	Fabricated Steel	147
Farmland Industries, Inc.	15	Anhydrous Ammonia	132
Enid News and Eagle	1	Newspaper	130
U.S. Postal Service	1	Postal Service	124
Atwoods	10	Farm Distribution	123
Groendyke Transport	15	Trucking	120
Oklahoma Gas & Electric	15	Electric Service	101
CadCom/Voice	2	Telecommunications Equipment and Service	100
Trinity Fitting Group	2	Steel Fabrication	95
Johnston Enterprises	1	Grain Elevators	92
Great Lakes Carbon	11	Petroleum Coke	76

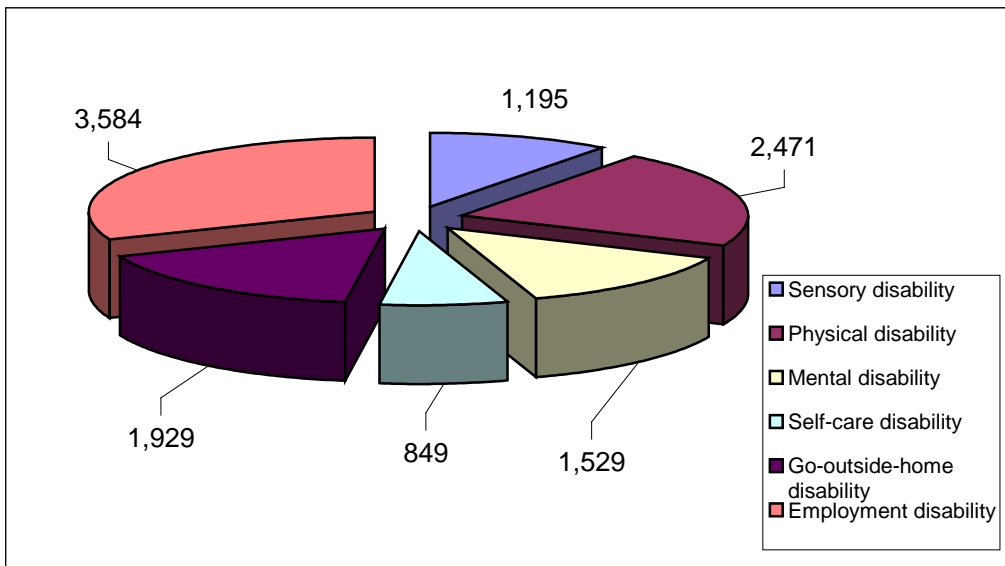
Source: Enid Chamber of Commerce

Figure 6 City of Enid: Non-Institutionalized Persons with Disabilities, Ages 5 - 15



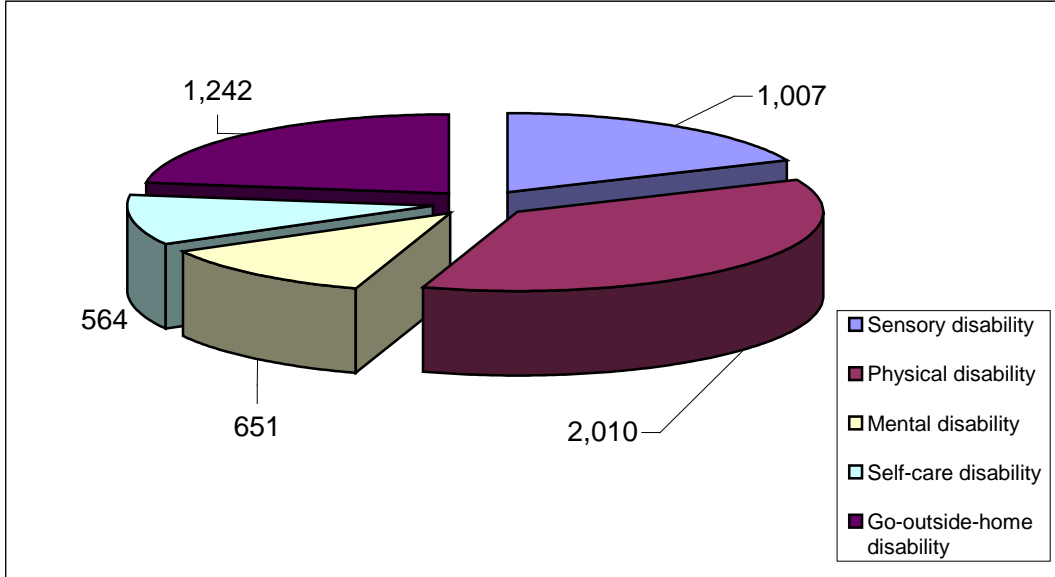
Source: U.S. Census Bureau, 2000 US Census

Figure 7 City of Enid: Non-Institutionalized Persons with Disabilities, Ages 16 – 64



Source: U.S. Census Bureau, 2000 US Census

Figure 8 City of Enid: Non-Institutionalized Persons with Disabilities, Ages 65 and Older



Source: U.S. Census Bureau, 2000 US Census

Figure 9 City of Enid: Travel Time to Work

