

Analysis of Impediments To Fair Housing Choice

City of Fond du Lac, Wisconsin

January, 2011

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Analysis of Impediments to Fair Housing Choice For the City of Fond du Lac, Wisconsin

I. Introduction and Executive Summary:

The City of Fond du Lac is a community of 43,600 people, the county seat for Fond du Lac County, and located at the foot of Lake Winnebago on the Hwy 41 Corridor. A one-hour drive from Wisconsin's major population centers of Milwaukee, Green Bay and Madison, Fond du Lac is strategically positioned as the gateway to the Fox River Valley.

The City of Fond du Lac has a total of three industrial parks and a significant manufacturing sector providing a significant number of jobs and a solid base from which to draw employees. The community also has three institutes of higher learning: Moraine Park Technical College, the University of Wisconsin Fond du Lac, and Marian University.

The City of Fond du Lac became a Community Development Block Grant (CDBG) Entitlement Community in 2004. Prior to 2004, the City received CDBG funding through the Small Cities program at the State level. The City has had a long history of programming which meets HUD's National Objectives for the CDBG program of assisting low-to-moderate income individuals, eliminating blight and/or serving an urgent need in the community.

A. Lead Agency

The lead agency for development of the Analysis of Impediments to Fair Housing Choice (AI) was the City of Fond du Lac Community Development Department, 160 S. Macy Street, Fond du Lac, WI, 54935. The Community Development Department collected information through direct outreach to lenders, non-profits and service providers, analysis of statistical data and public hearings.

B. Participants

Participants in the AI development include City staff members, the Redevelopment Authority (RDA), non-profit agencies/service providers, lenders, REALTORS[®], members of relevant state agencies and the general public.

C. Methodology

HUD defines impediments to fair housing choice as:

“Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices”

Or

“Any actions, omissions, or decisions which have the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin”

The Analysis of Impediments seeks to identify any such impediments. Other housing issues may also be included.

The Analysis of Impediments to Fair Housing Choice is based on the suggested format in Chapter 2-Appendix of the Department of Housing and Urban Development’s Fair Housing Planning Guide, Volume 1. Statistical analysis was combined with public input to search out trends that may indicate that impediments exist. Public and private policies, procedures, and practices within the jurisdiction that affect the location, availability and accessibility of housing and the current residential patterns and conditions related to fair housing choice were also examined.

On October 17, 2010, written requests for comments were sent to 75 people who are on a “Supportive Housing Providers” list within the Fond du Lac area. The communication stated that the City would be writing the Analysis of Impediments to Fair Housing Choice, defined impediments and asked for comments regarding relative issues (see Appendix A). Recipients were asked to provide written comments and were also invited to the Public Hearing on Impediments to Fair Housing Choice before the Redevelopment Authority on November 17, 2010.

On November 17, 2010 the Redevelopment Authority held the referenced public hearing. The meeting was attended by the seven-member Redevelopment

Authority Board, four staff members and seven people from the community. No one from the public made any comments about the Analysis of Impediments to Fair Housing Choice.

Between October 1 and December 1, the Community Development Department staff conducted interviews with agencies and organizations to gather information to be incorporated in the AI.

On December 8, 2010, a notice of availability of the AI was placed in the Action Advertiser, as well as posted in City Hall, on the City web site and at the Public Library. On December 15, 2010, the Redevelopment Authority held a public hearing on the draft AI. A resolution adopting the AI was approved by the RDA on December 15, 2010. Public comments were accepted until January 15, 2011 and in late January the AI was forwarded to HUD.

D. How Funded

All activities undertaken as part of the Analysis of Impediments to Fair Housing Choice were funded by the Community Development Block Grant Program.

E. Conclusions

Impediments Found

Through interviews, written request for comment, research and public hearings, no blatant incidents of discrimination were discovered or reported. Lenders and real estate professionals are held to strict regulations and take them very seriously. Although they stated they haven't seen discrimination within their industry, they indicated that it still could be occurring. Service providers of public housing and housing related assistance programs also were not aware of any apparent discrimination or other impediments to fair housing, and have not heard reports from any of the clientele they come in contact with, of any complaints of discrimination.

The public sector has worked very diligently to affirmatively further fair housing through anti-discrimination ordinances, housing related goals in the Comprehensive Plan, and strong support for low-income housing projects. Additionally the City has facilitated the development of a significant number of multi-family dwelling units in the past ten years through appropriate zoning codes and building permit approval.

A recent proposed amendment of the zoning map to support the construction of more affordable housing in a specific area of the community is pending approval. The City has been financially supportive of affordable housing as well. Of the residential units developed over the past ten years, approximately 54% of the nearly 1500 units were multi-family or two-family units (see Appendix B). The City has also been supportive of several low-income housing developments.

A thought shared by several of the people interviewed was that as long as there is an available supply of housing, discrimination that occurs may go unreported. A tolerance and acceptance of racial diversity seems to exist. Where it was reported that discrimination is more likely to occur is when judgments are made about lifestyle choices (renting to unmarried couples) and sexual orientation. One service provider also noted that if a renter is denied an apartment, it is typically because they have bad credit and poor rental history. This particular individual also believed there was more discrimination that went on with regard to hiring than providing housing.

The information contained in this analysis does not indicate existence of wide spread discrimination against any of the various protected classes. Despite this finding it is important that the City continue its efforts to assure fair housing choice continues to be available for all persons.

Actions to Address Impediments

- Continue to support fair housing educational activities such as the Community Housing Resource Board (CHRB)'s poster/essay contest and fair housing seminars, particularly for smaller landlords who may lack knowledge about fair housing laws.
- Continue outreach efforts to those who may have experienced discrimination. This outreach includes advertising the City's fair housing policies and Equal Opportunity Commission (EOC)'s complaint procedures through both conventional and minority oriented media.
- Continue to support affordable housing and multi-family housing construction through ongoing review and revision if necessary of the City's zoning map and other codes.

- Continue to affirmatively further fair housing through activities identified in the Comprehensive Plan related to housing such as encouraging developers of newly platted subdivisions to provide for entry level housing by allowing a reduction in the minimum lot area for no more than 20% of the lots in the subdivision.
- Continue to support efforts to create a comprehensive housing counseling agency to assist tenants, landlords and potential homebuyers with their housing issues.
- Continue to support programs offered by the City and County Housing Authority.
- Continue the City’s housing rehabilitation program.
- Continue to offer support to “United for Diversity”, a local organization which promotes unity and understanding; embracing and celebrating differences among all people in the Fond du Lac area.

II. Jurisdictional Background Data

A. Demographic Data

The overall population of Fond du Lac has increased slightly over the last ten years. From 2000 to 2009, estimates show the population rising from 42,203 and 43,600.

The population has become slightly more ethnically diverse from 2000 to 2009, changing from 94.7% white, to 92.6% white. A summary of the changes in composition of the population by race is below.

Comparison of Census Information for Race City of Fond du Lac		
Race	2000	2006-2008 Estimate
White alone	94.7	92.6
Black or African American alone	1.9	1.8
American Indian/Alaskan Native	0.5	0.7
Asian	1.5	0.9
Some other race	1.4	1.8
<u>Two or more races</u>	<u>0</u>	<u>2.2</u>
Total	100	100

The percentage of families below the poverty level has increased from 4.6% 2000 to 6.0% in 2009. Percent of families with a female head of household (no male present) below the poverty level increased from 23.5% in 2000 to 31.3% in 2009.

The percent of individuals living below the poverty level in the City of Fond du Lac in 2009 was 10.1% (up from 7.5% of the population in 2000). The percent of individuals living below the poverty level in the state of Wisconsin in 2009 was estimated at 12.4%.

Occupied housing units in the City of Fond du Lac increased from 16,638 to 16,886 between 2000 and 2009. Of those, owner-occupied housing units increased from 10,270 to 10,318. Renter-occupied units increased from 6,368 to 6,568.

The rate of home ownership in the City of Fond du Lac is approximately 61.7%, compared to the state of Wisconsin at 68.4%.

The median monthly housing costs for mortgaged owners was \$1,274, non-mortgaged owners \$463, and renters \$644. Thirty-one percent of owners with mortgages, 17 percent of owners without mortgages, and 40 percent of renters in Fond du Lac County spent 30 percent or more of household income on housing.

	Fond du Lac	Wisconsin
Population, 2006 estimate	43,270	5,556,506
Population, percent change, April 1, 2000 to July 1, 2006	0.2%	3.6%
Population, 2000	42,203	5,363,675
Persons under 5 years old, percent, 2000	6.5%	6.4%
Persons under 18 years old, percent, 2000	24.2%	25.5%
Persons 65 years old and over, percent, 2000	15.3%	13.1%
Female persons, percent, 2000	53.0%	50.6%
White persons, percent, 2000 (a)	93.6%	88.9%
Black persons, percent, 2000 (a)	1.9%	5.7%
American Indian and Alaska Native persons, percent, 2000 (a)	0.5%	0.9%
Asian persons, percent, 2000 (a)	1.5%	1.7%
Persons reporting two or more races, percent, 2000	1.2%	1.2%
Persons of Hispanic or Latino origin, percent, 2000 (b)	2.9%	3.6%
Living in same house in 1995 and 2000, pct 5 yrs old & over	50.5%	56.5%
Foreign born persons, percent, 2000	3.3%	3.6%
Language other than English spoken at home, pct age 5+, 2000	6.1%	7.3%
High school graduates, percent of persons age 25+, 2000	83.9%	85.1%
Bachelor's degree or higher, pct of persons age 25+, 2000	19.0%	22.4%
Mean travel time to work (minutes), workers age 16+, 2000	16.7	20.8

Housing units, 2000	17,519	2,321,144
Homeownership rate, 2000	61.7%	68.4%
Median value of owner-occupied housing units, 2000	\$91,200	\$112,200
Households, 2000	16,638	2,084,544
Persons per household, 2000	2.38	2.5
Median household income, 1999	\$41,113	\$43,791
Per capita money income, 1999	\$18,996	\$21,271
Persons below poverty, percent, 1999	7.5%	8.7%

B. Income Data

The median income of households in Fond du Lac County was \$50,609. Eighty-two percent of the households received earnings and 16 percent received retirement income other than Social Security. Twenty-eight percent of the households received Social Security. The average income from Social Security was \$17,257. These income sources are not mutually exclusive; that is, some households received income from more than one source.

Data from the 2010 census is not yet available, so included here is the data from the 2000 census.

INCOME IN 1999		
Households	16,676	100.0
Less than \$10,000	1,228	7.4
\$10,000 to \$14,999	1,109	6.7
\$15,000 to \$24,999	2,427	14.6
\$25,000 to \$34,999	2,175	13.0
\$35,000 to \$49,999	3,444	20.7
\$50,000 to \$74,999	3,941	23.6
\$75,000 to \$99,999	1,425	8.5
\$100,000 to \$149,999	656	3.9
\$150,000 to \$199,999	128	0.8
\$200,000 or more	143	0.9
Median household income (dollars)	41,113	(X)
With earnings	13,479	80.8
Mean earnings (dollars)	46,662	(X)
With Social Security income	4,593	27.5
Mean Social Security income (dollars)	11,687	(X)
With Supplemental Security Income	595	3.6
Mean Supplemental Security Income (dollars)	6,859	(X)
With public assistance income	273	1.6
Mean public assistance income (dollars)	2,572	(X)
With retirement income	2,451	14.7
Mean retirement income (dollars)	13,471	(X)

From the 2000 census data, it has been concluded that there are several census block groups with more than 51% percent low or moderate income individuals. These block groups include 402-4, 403-4, 405-1, 405-2, 405-4, 407-1, 407-3, and 410-3. A map depicting this can be seen in Appendix C.

Income and Poverty data for City of Fond du Lac		
Census Tract	Median Household Income in 1999 (dollars)	Per capita income in 1999
Tract 401	46,075	19,594
Tract 402	37,188	14,481
Tract 403	35,224	18,110
Tract 404	48,088	18,736
Tract 405	24,875	15,717
Tract 407	42,500	20,896
Tract 408	42,190	18,435
Tract 409	42,146	19,279
Tract 410	42,287	23,440
Tract 411	51,570	22,745
Tract 413	43,880	19,190
Tract 420	62,804	23,759

C. Employment Data

Data taken from the Wisconsin Department of Workforce Development, Division of Employment and Training Bureau of Workforce Training shows the following:

The Unemployment rate for the City of Fond du Lac was 10.1% in September 2009, but has dropped to 8.2% as of September 2010 (See Appendix D).

The City of Fond du Lac ranks 14th out of the largest 31 cities in the state of Wisconsin for unemployment. Beloit has the highest unemployment at a rate of 14.4%, while Caledonia has the lowest unemployment at 3.7%.

Seasonally adjusted employment for the Fond du Lac metropolitan survey area is 44,600 as of September 2010. That is up 200 employees over the same month one year ago.

	Employer Name
1	AGNESIAN HEALTHCARE INC
2	BRUNSWICK CORP
3	FOND DU LAC SCHOOL DISTRICT
4	COUNTY OF FOND DU LAC
5	MORAINE PARK TECHNICAL COLLEGE
6	J F AHERN CO
7	CHARTER COMMUNICATIONS
8	TAYCHEEDAH CORRECTIONAL INSTITUTION
9	WAL-MART
10	CITY OF FOND DU LAC
11	MARIAN COLLEGE
12	GIDDINGS & LEWIS MACHINE TOOLS LLC
13	SOCIETY INSURANCE A MUTUAL CO
14	FOND DU LAC LUTHERAN HOME INC
15	BADGER LIQUOR CO., INC.
16	C D SMITH CONSTRUCTION INC
17	AURORA MEDICAL
18	WELLPOINT COMPANIES INC
19	MCDONALD'S
20	PICK'N SAVE
21	BRENNER TANK LLC
22	WELLS MFG LP
23	MID-STATES ALUMINUM CORP
24	HOLIDAY BUICK HOLIDAY PONTIAC
25	CONSULTANTS LABORATORY OF

The Fond du Lac area has many services for job seekers including Fond du Lac Area Job and Career Center and partner agencies: Moraine Park Technical College, Job

Service, Fond du Lac County Department of Social Services, Division of Vocational Rehabilitation, Fox Valley Workforce Development Board, and ADVOCAP, Inc. These agencies exist in accessible areas throughout the City of Fond du Lac to serve job seekers in the most convenient manner. All of the organizations serving job seekers are located on or within a reasonable distance to Fond du Lac Area Transit routes. Additionally, services provided by the above listed agencies are available to all people.

D. Housing Profile

Sixty two percent of the housing stock in the City of Fond du Lac was constructed prior to 1970, which is higher than Fond du Lac County and the State of Wisconsin.

The median value of housing in Fond du Lac in 2000 was \$91,200. This is significantly lower than throughout the county (\$101,000) and state (\$112,200). It was, however, 80% higher than it was in 1990. The median value of a single family home in 2008 was \$108,400 according to the City Assessor.

Housing values in Fond du Lac in 2000 reflected the income levels of most of the population. More than 62% of homes in 2000 were valued at less than \$100,000 and 87% were valued at less than \$150,000.

Fond du Lac has a higher than average percentage of housing units in buildings with five or more units than in nearby communities of similar size. The primary reason for this is that, with the exception of the Village of North Fond du Lac, the surrounding communities do not encourage the development of multi-family housing. In some cases, the zoning ordinances do not allow multi-family residential land uses. This makes the City of Fond du Lac attractive to the developers of multi-family housing. There were 768 more units in buildings with five or more units in 2000 than there were in 1990. This is a 28% increase in their proportion of all housing units.

Approximately 38% of the housing units in 2000 were rental units. The number of renter-occupied units in Fond du Lac increased 16% from 1990 to 2000. Owner-occupied units increased twelve percent.

Compared to the county and state, households in Fond du Lac in 2000 were less likely to be comprised of families (all persons related), and more likely to have a lone occupant and be headed by a female. One quarter of Fond du Lac households have at least one occupant who is older than 65 years of age. The number of persons per household is declining in Fond du Lac, as it is throughout the state and nation.

The higher than average percentage of people in rental housing may represent a market for owner-occupied housing in the future.

In an example of intergovernmental cooperation, the City of Fond du Lac administers both the City and County housing authorities.

Almost all of the major findings above are a result of the analysis of 1990 and 2000 US Census data and the housing programs that are currently in existence. While this analysis is a good guide to housing in the future when economic conditions remain the same or change in a gradual manner, recent events with respect to the United States economy in general and the housing economy specifically present the City of Fond du Lac with challenges.

The housing market in the past several decades has operated under the assumption that housing values will continue to rise. This resulted in housing lenders, with the support of the federal government, making loans with little or no down payment, loans that were interest only, or loans with adjustable rates that assumed the borrower's income would continue to increase. The availability of a secondary market for residential mortgages resulted in little to no risk being assumed by the originator of a mortgage, as the mortgage was not kept by the originator for servicing or collection. As a result, loans were made that were good if the economy continued to grow but would become problematic if the economy declined, which it has.

The loans made through the sub-prime residential mortgage market were the first to be affected by the recent downturn in the global economy. Housing values have decreased. Foreclosures have increased. While the City of Fond du Lac has not been negatively impacted as much as other areas of the country where housing market

values had increased dramatically over the past ten to twenty years, it is starting to see the impact of a decline in housing values and an increase in foreclosures.

In a newspaper article published September 23, 2010, Fond du Lac ranked 11th most affordable housing market in the nation, in a report released by Coldwell Banker (See Appendix E).

E. Other Relevant Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress to provide the public loan data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities; assist public officials in distributing public-sector investments so as to attract private investment to areas where it is needed; and in identifying possible discriminatory lending patterns.

Home Mortgage Disclosure information was obtained from the website

<http://www.ffiec.gov/hmdaadwebreport/AggTableList.aspx>.

For the purposes of this analysis, HMDA data was reviewed to identify and evaluate lending practices in relation to income and race status by comparing the number of loans denied with the number of applications received to identify preferences or trends in Home Mortgage Insurance underwriting activities. Unfortunately, data that identified loan information by both race and tract simultaneously is not provided.

The following HMDA Tables were reviewed and analyzed (and can be found in Appendix G):

Aggregate Table 1: Disposition of Loan Applications by Location of Property and Type of Loan, 2009

Aggregate Tables 4-1 through 4-3: Disposition of Applications for Loans by Race, Ethnicity, Gender and Income of Applicant, 2009 (three types of loans)

Aggregate Table 7-1: Disposition of Applications for Loans by Characteristics of Census Tract In Which Property is Located, 2009

Aggregate Table 8-1 through 8-3: Reasons for Denial of Application by Race, Ethnicity, Gender and Income of Applicant, 2009

A summary of HMDA Tables includes the following observations:

- 83.7% of loan underwriting in 2009 was for refinancing.
- The census tracts with the highest median household income had the lowest rate of loan denial for purchase of a home in 2009.
- There was no disparity among percentage of loan denials across income rankings.
- Minority populations appear to be slightly underrepresented in loan applications as a percentage of the total population.
- Primary reasons for denial include collateral, debt-to-income ratio and credit history.
- In the lowest income category, debt-to-income ratio was the number one reason for denial of a loan request.

III Evaluation of Jurisdiction’s Current Fair Housing Legal Status

The City of Fond du Lac Community Development Department consulted with the Fond du Lac City Attorney’s Office, the Fond du Lac County District Attorney’s Office, the State of Wisconsin Equal Rights Division, and the City of Fond du Lac Community Housing Resource Board to gather information regarding complaints and actions relative to housing discrimination complaints and litigation.

A. Fair Housing Complaints

There was one housing discrimination complaint to the Equal Opportunity Commission (EOC) in 2007. It was investigated, and no probable cause was found.

B. Fair Housing Discrimination Suits

There have been no fair housing discrimination suits in the past four years, the period over which this report covers.

IV Identification of Impediments to Fair Housing Choice

A. Public Sector

1. Zoning and Site Selection

- a. Public Policies, Practices and Procedures Involving Housing

The City of Fond du Lac Zoning and Building Codes have been reviewed by the staff and committees over time to identify impediments to fair housing choice. No impediments to fair housing choice have been identified in the ordinances.

b. Zoning and Land Use Policies, Tax Assessment/Abatement Practices, Exclusionary Zoning and Discriminatory Land Use Practices

The City does not have restrictive zoning regulations that would prohibit housing development or increase its cost when such development would be consistent with the neighborhood's present usage.

2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

The City of Fond du Lac continues to sponsor the Housing Rehabilitation Program and the Rental Rehabilitation Program through funding and staffing. These programs operate in a manner to provide equal opportunity for homeowners to assure that no impediments to fair housing choice exist in the City.

The transportation linkages provided by the Fond du Lac Area Transit are essential for low/moderate income persons to connect with employment centers, service centers and health facilities. These effective linkages expand housing choices because they remove distance barriers and create ease of access. As a result, persons without transportation have broader, less geographically restricted housing and employment choices. The Fond du Lac Area Transit provides direct links from the central city to industrial areas. Recreational trails also link the downtown areas to areas offering more employment opportunities.

3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures: Housing Choices for Certificate and Voucher Holders

The Housing Authority of the City of Fond du Lac and Fond du Lac County Housing Authority have preference for families that live and/or work in Fond du Lac County for all programs administered by the City and County Housing Authorities. The programs include Public Housing, Section 8 New Construction and the Section 8 Housing Choice Voucher Program.

When admission policies are enforced, some people may be excluded from housing. It is important to recognize that the admission standards are based on law and are implemented in a manner to assure equal opportunity.

Since there is a greater need for vouchers and public housing than there are facilities, waiting lists will occur. Because of waiting lists and enforcement of admission policies, there will be dissatisfaction from the public. It is critical to assess each complaint on its merits to assure that housing discrimination does not occur.

Census data indicates that in 2008, the City of Fond du Lac's population was distributed among the following ethnic groups:

White	92.6%
Black/African American	1.8%
Hispanic or Latino	1.8%
Asian	.9%
American Indian/Alaska Native	.7%
Two or more race	2.2%

Data from the Public Housing Authority for the City of Fond du Lac presents the following distribution of housing clientele among racial groups:

White	85.65%
Black/African American	6.84%
Hispanic or Latino	5.74%
Asian	.44%
American Indian/Alaska Native	1.32%

The City of Fond du Lac Public Housing Authority works to promote the availability of accessible housing resources suitable for Section 8 participant families in which one or more individuals are mobility impaired. The City and

County Public Housing Authority together own 30 accessible units for applicants that are mobility impaired. Twenty eight of these units are one bedroom units and two are two bedroom units. Upon completion of the rehabilitation of the Calumet Apartments the number of one bedroom units available to the mobility impaired will increase by four.

4. Sale of Subsidized Housing and Possible Displacement

The City knows of no subsidized housing units in Fond du Lac that are scheduled for sale.

5. Property Tax Policies

The City of Fond du Lac does not have property tax policies that would create an impediment to fair housing, or favor one group of people over another. Low and moderate income residents in the state of Wisconsin can take advantage of the Homestead Tax Credit which eliminates the state tax obligation for renters or homeowners earning less than \$24,500.

6. Planning and Zoning Boards

Boards that could have an impact on neighborhood revitalization and housing development are the Redevelopment Authority (RDA), the City of Fond du Lac Plan Commission and the City Council. The RDA, which allocates CDBG funds, is comprised of citizen representatives and elected officials. The RDA has or previously had members that represent minority populations, women and low income populations. Nearly all the members have or have had families with children. Subsequently the needs of children are recognized by the Authority Board members.

All the committees have generally been supportive of neighborhood revitalization and housing initiatives through allocation of resources and zoning considerations. No actions by the committees could be interpreted as impediments to fair housing choice.

7. Building Codes (accessibility)

The City of Fond du Lac has adopted the Administrative Code Provisions of the Wisconsin State Building Codes for Barrier Free Design (COMM 69).

B. Private Sector

1. Lending Policies and Practices

The interviews which were conducted with residential mortgage lenders and members of the Fond du Lac real estate community revealed no evidence of discriminatory lending, appraisal, and underwriting practices, redlining or racial credit steering practices. Conversations with lenders indicated the concept of credit-worthiness can potentially be misconstrued as discriminatory lending practice. However, as long as the precepts of credit evaluations are used universally, such activity is not discriminatory. Lenders interviewed indicated they have mandatory fair housing training each year. Also noted is that prequalifying is very important, and assists the potential homeowner to understand how and what they may need to do in order to qualify for a loan. There are many loan programs that assist low-income homeowners. Local down payment assistance programs are available through ADVOCAP. The general consensus of interviewed lenders is that the empowerment of protected classes and education within the lending community has resulted in none of the above referenced activities being undertaken in the City of Fond du Lac. One lender was quoted as saying, “We really look for a way to get the loan done based on the numbers.”

2. Institutional Practices

Information was gathered through telephone interviews with REALTORS®, lenders, appraisers and insurance agents. All conversations indicate that the respective industry regulations effectively eliminate discriminatory actions that would serve as impediments to fair housing choice. Training for the industry regulations is regular and consistent. Each and every person interviewed was fully aware of and confident in the practices of affirmatively furthering fair housing within their industry.

3. Unlawful Real Estate Advertising Practices

Interviews with Fond du Lac area real estate professionals and personnel at the Fond du Lac Reporter resulted in the conclusion that unlawful real estate advertising practices are not occurring in the City of Fond du Lac.

4. Unlawful Real Estate Brokerage Services and Practices

Interviews with real estate professionals in the City of Fond du Lac revealed no evidence of unlawful real estate brokerage services or practices.

C. Public and Private Sector

Fair Housing Enforcement and Informational Programs

Fair housing enforcement is best perceived as a group effort. Government agencies must deliver their programs in a manner that is in compliance with all federal, state and local laws. Housing providers must operate their businesses in a non-discriminatory manner, as must those in the real estate industry, rental property owners, lenders the media and insurance companies. Consumers must be cognizant of their rights and speak out when discriminatory actions take place. There must be a forum for grievances to be heard. Finally, the responsibility for education can be shared by all parties involved.

The City of Fond du Lac uses CDBG funds to operate specific housing programs. Subrecipient agreements, which include fair housing requirements, are executed when non-profits undertake housing activities. Performance is periodically monitored to assure compliance and no impediments to fair housing choice have been identified.

Lenders, real estate agents, and insurance companies operate under scrutiny of governmental regulators who periodically monitor actions and respond to complaints. These organizations also provide routine training to assure compliance with fair housing laws.

D. Segregation and Housing Discrimination

Large scale examples of segregated housing conditions do not exist in Fond du Lac. Louise Gudex, Executive Director of the Fond du Lac Housing Authority has reported the following statistics related to the balance of the low income minority population across the public housing stock.

Race/Ethnicity of Head of Household on Program		
American Indian/Alaska Native	6	1.32%
Asian	2	0.44%
Black/African American	31	6.84%

Hispanic or Latino	26	5.74%
Native Hawaiian/Pacific Islander	0	0.00%
White	388	85.65%
Total	453	100.00%

Below is basic data from a September 2010 monthly report. Rosalind (142 one bedroom units), Grand Court (31 one bedroom units) and the family units (2 bedroom – 5 bedroom units= total of 76 units) are Public Housing. The Westnor Apartment complex is Section 8 New Construction (elderly; 100 one bedroom).

Race/Ethnicity of Head of Household on Program - September 2010

Race & Ethnicity	Rosalind	Grand Court	Family Units	Westnor	Total	Percentage
American Indian/Alaska Native	1	0	0	2	3	0.88%
Asian	1	0	6	1	8	2.35%
Black/African American	9	0	11	1	21	6.18%
Hispanic or Latino	1	0	3	2	6	1.76%
Native Hawaiian/Pacific Islander	0	0	0	0	0	0.00%
White - NonHispanic	130	30	52	90	302	88.82%
Total	142	30	72	96	340	100.00%

68 families living in family units have minor children (181 children)

Although segregation and discrimination related to public housing do not appear to be present in the City of Fond du Lac, minorities have tended to seek housing in a concentrated area. It appears the central city or census tract 405 contains a large concentration of minorities, particularly African American and Hispanic. According to one service provider, news of their services has traveled among the Hispanic community primarily by word of mouth. This may relate to the location of housing choice as well.

V. Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The City of Fond du Lac has maintained an anti-discrimination ordinance and supported the Equal Opportunities Commission, whose charge it is to enforce the ordinance. The ordinance is periodically reviewed and updated if necessary on an ongoing basis.

The City of Fond du Lac Community Development Department operates both owner-occupied residential rehabilitation and rental rehabilitation loan programs through CDBG funding. ADVOCAP operates a down payment assistance program funded through HCRI. These programs and others offered in the community stress the importance of fair housing to those receiving assistance and educate clientele on how to seek assistance if they believe they are being discriminated against. Landlords pursuing assistance through the rental rehabilitation loan program are educated on fair housing and agree to the requirements under the law.

The Diversity Circles program was a successful program conducted in the City of Fond du Lac for approximately two years until interest in the program from a minority standpoint declined. Additionally, facilitation of the program transitioned and the program is no longer active. A new group called "United for Diversity" has become the organization furthering awareness and recognition of diversity in the community. This organization has received support in various forms from the City and the County.

The City has, over the years supported the Community Housing Resource Board's (CHRB) poster/essay contest and fair housing seminars, particularly for small landlords who may lack knowledge about fair housing laws.

The City continues outreach efforts to those who may have been discriminated against by advertising the City's fair housing policies and EOC complaint procedures through both conventional and minority oriented media.

Real estate offices in the Fond du Lac area promote fair housing and address discrimination reporting and education through individual agency training programs. In addition, in order to maintain the real estate sales license, real estate sales people are required to attend continuing education classes including those which address fair housing on a regular basis.

Lending institutions and homeowner insurance companies require annual training and education related to fair housing matters. Many institutions provide this training in-house and perform internal monitoring of their employees.

VI. Conclusions and Recommendations

As a result of the analysis of policies, procedures and practices within the jurisdiction that affect the location, availability, and accessibility of housing and the current residential patterns and conditions related to fair housing choice, it can safely be said that the majority of people working in the housing industry operate in a manner that is consistent with fair housing laws. However, even though hard evidence of impediments to fair housing choice is not available, anecdotal information indicates that impediments do exist.

Fair Housing Complaints

There was one housing discrimination complaint to the EOC in 2007. Upon investigation, no probable cause was found.

Zoning and Site Selection

No issues were perceived in the area of zoning or site selection.

Neighborhood Revitalization, Municipal and Other services, Employment-Housing-Transportation Linkage

No issues were perceived in the areas of neighborhood revitalization, municipal and other services, or employment-housing-transportation linkages.

PHA and Other Assisted/Insured Housing Provider Tenant Selection

Procedures: Housing Choices for Certificate and Voucher Holders

The Fond du Lac Housing Authority does not have a pattern or concentration of tenants by race or ethnicity, nor do tenant selection policies and procedures exclude or limit the participation of persons with disabilities in housing developments operated by the housing authority. The policies of the Fond du Lac Housing Authority are consistent with Federal, State and local law, and HUD regulation and guidance.

Additionally, the Fond du Lac Housing Authority assists all voucher and certificate holders find suitable housing. The Fond du Lac Housing Authority owns 30 accessible

units for applicants who are mobility impaired. Twenty eight of the units are one bedroom units and two are two-bedroom units. Additional units for residents with physical disabilities will be available in the Calumet Apartment building when renovations are complete in mid-2011. The Housing Authority also works closely with the Fond du Lac Aging and Disability Resource Center for families and individuals who need additional assistance.

Property Tax Policies

Due to the availability of rental properties in the market, and the limited waiting lists for public housing, it is not necessary for the City of make a regular practice of approving tax exempt properties. Additionally, the Wisconsin Constitution prohibits forgiveness of taxes or preferential tax rates for housing projects.

Planning and Zoning Boards

No issues were perceived related to planning and zoning boards. However, members of Planning and Zoning Boards could benefit from educational or outreach efforts that are targeted toward property owners and tenants.

Lending Policies

Interviews with lenders indicated that fair housing issues are considered in daily operations and that laws are enforced effectively. Since lending is a competitive business, borrowers have the option of seeking other lenders to provide financing. In general, the primary reasons for loan denial are credit history and debt to income ratio.

Inability to secure mortgage financing is clearly a barrier to housing. If the barrier is caused by a response to race, color, religion, sex, disability, familial status, or national origin, it meets HUD's definition of an impediment to fair housing choice. In such cases, fair housing education is necessary and legal recourse is a possibility if educational efforts do not produce results.

If the inability to secure a mortgage is based on valid economic considerations, the problem lies with the applicant, not the lender. In such cases, financial counseling of the applicant is a viable solution. Unfortunately, predatory lenders sometimes fill the void when prime lenders deny financing.

Real Estate Practices

Real estate sales and related industries such as appraisal and advertising services have been heavily exposed to fair housing issues and have developed operational procedures to assure that discriminatory practices do not take place. They operate under state and federal regulation and because they are so visible, they are easy targets for litigation.

No impediments to fair housing choice were identified in this area.

The common belief has been that in real estate rental practices, the professional property management firms are fully aware of their responsibilities and conduct themselves appropriately. It was also felt that if discriminatory behavior did exist it was the small operator that was likely the culprit. Continued fair housing education for all rental property owners is recommended. Educational opportunities for tenants are also recommended,

Conclusion

Impediments to fair housing choice in relation to disabilities and race have been indicated in the past in the City of Fond du Lac. In the past six years, no complaints have been filed related to housing discrimination. Through the process of compiling the research for this report, there were no obvious areas or specific incidents of housing discrimination. Although it may appear on the surface that Fond du Lac is a community free from discrimination, there are also available housing units. Potential homeowners and tenants may just move on and seek housing elsewhere in the community if one has an experience of discrimination.

Education is a critical weapon in the fight against discrimination and resources should be devoted to fair housing education for both rental property owners and tenants. A onetime effort would be a good start, but a regular, on-going educational effort would be more fruitful. To that end, it is recommended that the City:

- Continue to support fair housing educational activities such as the Community Housing Resource Board (CHRB)'s poster/essay contest and fair housing seminars, particularly for smaller landlords who may lack knowledge about fair housing laws.
- Continue outreach efforts to those who may have experienced discrimination. This outreach includes advertising the City's fair housing policies and Equal Opportunity Commission (EOC)'s complaint procedures through both conventional and minority oriented media.

- Continue to support affordable housing and multi-family housing construction through ongoing review and revision if necessary of the City's zoning map and other codes.
- Continue to affirmatively further fair housing through activities identified in the Comprehensive Plan related to housing such as encourage developers of newly platted subdivisions to provide for entry level housing by allowing a reduction in the minimum lot area for no more than 20% of the lots in the subdivision.
- Continue to support efforts to create a comprehensive housing counseling agency to assist tenants, landlords and potential homebuyers with their housing issues.
- Continue to support programs offered by the City and County Housing Authority.
- Continue the City's housing rehabilitation program.
- Continue to offer support to "United for Diversity", a local organization which promotes unity and understanding; embracing and celebrating differences among all people in the Fond du Lac area.

VII Resolution Adopting AI

VIII Appendix

Appendix A	Letter to Stakeholders requesting input for Analysis List of Supportive Housing Providers
Appendix B	City Development Activity, 2000-2009
Appendix C	Map of Low Income Census Tracts
Appendix D	Employment and Home Foreclosure/Ownership Data
Appendix E	Newspaper Article
Appendix F	Home Mortgage Disclosure Act Tables



City of Fond du Lac First on the Lake

City-County Government Center
160 S. Macy Street—P.O. Box 150—Fond du Lac, WI 54936-0150

Muaj txhais lus pad dawb. Hu rau peb tus xov tooj 322-3440. / Tenemos servicios disponible de interprete gratuito. Favor de llamar al 322-3440 para asistencia.

October 15, 2010

The City of Fond du Lac Community Development Department is rewriting the 2004 "Analysis of Impediments to Fair Housing Choice" (AI) and will be submitting it to the Department of Housing and Urban Development (HUD) early in 2011. HUD defines impediments to fair housing choice as:

"Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices"

"Any actions, omissions, or decisions which have the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin"

Your input is requested regarding fair housing issues and, hopefully you will participate in the development of the updated AI. The AI identifies fair housing issues and is the first step in efforts to affirmatively further fair housing. Once impediments are identified, plans to remedy such impediments can be developed. Identified issues and related remedies will also be included in the City's Consolidated Plan.

A copy of the previous AI will be sent to you for reference upon request. You are free to provide separate written comments regarding both impediments and remedies. All comments will be considered. Members of the lending community, REALTORS®, elected officials, housing providers and relevant organizations will be contacted for their input.

The Redevelopment Authority (RDA) will hold a public hearing at 5:30 pm on Wednesday, November 17, 2010 in Rooms D & E (first floor) of the City-County Government Center at 160 S. Macy Street to take comments from the public regarding impediments to fair housing choice.

Written comments may be received in advance of the public hearing, or you may call the Community Development Department to share your comments verbally (call 902-322-3440). You may attend the public hearing to speak directly to the RDA if you wish. Please contact me directly with any questions you may have, at 920-322-3443, or 715-581-4339.

Sincerely,

Kristen Fish, Redevelopment Resources
For the Community Development Department, City of Fond du Lac

Fond du Lac City Government is committed to providing and promoting a high quality of life, business success, and safety to residents, visitors, and future generations as an excellent place to work, play and raise a family.

Distribution List Name: Supportive Housing Providers

Members:

Amy Hansen/Downtown Fond du Lac Partnership

Amy Oskola/FdL County Advocates
Ann Calnin/Residential Services
BevGudex/Adult Care Consultants
Brenda Hicks-Sorensen/FCEDC
Cal Schultz/Keystone Development
Carlos Marquez/EOC
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Denise Retzeff/Diversity Circles
Don Mueller/RDA
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Esther Mukand-Cerro/Senior Services
Friends of Historic Fond du Lac
Howard Mandeville/Movin' Out, Inc.
Ishamon Harris/EOC
John Vercauteren/Blandine House
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Roxanne Burkhardt/Salvation Army
Ryan Scheel/Boys & Girls Club
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City Development Activity (2000-2009)

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Total
Commercial/Industrial value (\$)	14,678,554	14,949,412	22,205,169	16,458,692	14,381,886	23,546,677	18,184,917	25,748,534	17,049,738	11,985,257	179,189,836
New Lots/Parcels	31	284	119	206	51	61	87	12	27	11	889
Single Family	91	87	86	113	72	76	66	47	35	20	693
Multi-family (# buildings)	6	13	5	3	5	12	6	2	13	9	74
Multi-family (# units)	40	140	49	24	20	76	25	9	140	84	607
Two-family (# units)	22	22	30	36	14	18	26	14	12	2	196
Total multi-fam & Two-family units	62	162	79	60	34	94	51	23	152	86	803
TOTAL UNITS	153	249	165	173	106	179	117	70	187	106	2000-2009 1496



Census Block Groups With 51% or More
Low or Moderate Income Persons

000 = Census Tract
 0 = Block Group
 Source: 2000, US Census



How is Fond du Lac County Doing?

September, 2010 Unemployment Rate - not seasonally adjusted

City of Fond du Lac	8.2%
Fond du Lac County	6.7%
State of Wisconsin	7.0%
Nation	9.2%

Fond du Lac County Employment Based on Resident Population

Annual Data	2009	2008	2007	2006	2005	2004
Labor Force	56,111	56,729	56,999	56,729	56,138	56,247
Employed	51,124	54,061	54,388	54,080	53,523	53,591
Unemployment Rate	8.9%	4.7%	4.6%	4.7%	4.7%	4.7%

Monthly as of June each year (2010 not benchmarked)	Jun-10	Jun-09	Jun-08	Jun-07	Jun-06	Jun-05
Labor Force	56,409	56,999	57,849	57,764	57,760	57,396
Employed	51,992	51,477	55,215	54,909	54,904	54,525
Unemployed	4,417	5,522	2,634	2,855	2,856	2,871

Change in Unemployed from Prior Year	(1,105)	2,888	(221)	(1)	(15)	na
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Source: Wisconsin Department of Workforce Development, Bureau of Workforce Training - Labor Market Information Query (LAUS results created on 07/21/10 <http://WORKnet.Wisconsin.gov>)

Establishments, Employment, Wages, and Unemployment - Employment is based on place of work

	2009	2008	2007	2006	2005	2004
Average # of Establishments	2,375	2,434	2,415	2,438	2,462	2,477
Average Annual Wage	\$35,670	\$36,178	\$34,674	\$33,407	\$32,649	\$31,765
Average Monthly Employment	42,903	45,948	45,987	45,658	45,298	45,113
Change in Employ. from prior yr.	-3,045	-39	329	360	185	na
5-year Change in Employment	-2,210					

Source: Wisconsin Department of Workforce Development, Bureau of Workforce Training - Labor Market Information Query (QCEW) results created on 06/02/10 <http://WORKnet.Wisconsin.gov>)

Appendix E

Published: September 23, 2010

Tags: [affordable housing](#), [Coldwell Banker](#), [Fond du Lac](#), [Green Bay](#), [Home Listing Report](#), [Wausau](#)



A home is shown for sale in Springfield, Ill. Both Wisconsin and Minnesota had cities land on Coldwell Banker's most affordable housing list. (AP Photo/Seth Perlman)

By Scott Carlson

Dolan Media Newswires

MINNEAPOLIS, MN — The Twin Cities and three Wisconsin cities rank as some of the nation's most affordable housing markets, according to report released Wednesday by Coldwell Banker.

The Edina, Minn.-based realty firm's conclusion is based on its survey of 18,000 four-bedroom, two-bathroom homes on coldwellbanker.com that were listed between February and August of this year from nearly 300 selected U.S. markets.

Of Minnesota cities in the national survey, St. Cloud is the most affordable market with a typical four-bedroom, two-bathroom, according to CB's [Home Listing Report](#). Of 296 U.S. markets surveyed, St. Cloud ranked No. 65 for affordability with the its typical four-bedroom, two-bathroom home listing for \$187,181.

Meanwhile, St. Paul ranked No. 130 on the Home Listing Report with its average sales price listed at \$236,491. Minneapolis was No. 151 on the survey with the typical four-bedroom, two-bath home listing for \$259,954.

Most expensive of the Minnesota cities surveyed was Edina, ranked No. 217 with the average listing price at \$403,473. Still, that Edina home listing was about \$1.4 million less than the most

expensive market in the nation, Newport Beach, Calif., where a similar home's list price was \$1.8 million.

In Wisconsin, Fond du Lac ranked No. 11, Wausau was 32nd and Green Bay was 34th.

Appendix F HMDA Tables