



**CITY OF JACKSONVILLE**

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**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

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## *Section I: Introduction*

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The City of Jacksonville, Florida, is a vibrant, diverse community located on Florida's historic Northeastern coast. The City is home to more than 800,000 people and experienced strong growth in the years since the 2000 Census. As a participating jurisdiction in federal entitlement programs administered by the U.S. Department of Housing and Urban Development (HUD), the City is required to prepare an Analysis of Impediments to Fair Housing Choice (AI). The City's first AI was prepared in 2005; this version of the AI is completely revised and updated.

This Analysis of Impediments serves as the basis for the City's efforts to Affirmatively Further Fair Housing. It has been prepared as part of a comprehensive Fair Housing planning process that involved extensive outreach to citizens and stakeholder organizations, as well as in-depth data analysis.

HUD's *Fair Housing Planning Guide, Volume 1*, provides information on what is required of participating jurisdictions in their efforts to affirmatively further Fair Housing:

- Analyze and eliminate housing discrimination
- Promote Fair Housing choice for all persons
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin<sup>1</sup>

The City of Jacksonville is committed to affirmatively furthering Fair Housing. This AI and the Fair Housing planning process used as the basis for its preparation are a reflection of that commitment.

### *LEAD AND PARTICIPATING AGENCIES*

This AI is the result of a collaborative planning process led by the City of Jacksonville's Housing and Neighborhoods Department. Other City agencies involved in this effort included the Jacksonville Human Rights Commission, the Planning and Development Department, the Jacksonville Housing and Community

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<sup>1</sup> p. 1-3

Development Commission, the Jacksonville Housing Authority, and the Jacksonville Housing Finance Authority.

The Shimberg Center for Housing Studies at the University of Florida prepared the AI document on behalf of the City of Jacksonville's Housing and Neighborhoods Department. Dr. Anne R. Williamson, Assistant Professor, Department of Political Science, University of Alabama, served as project director on behalf of the Shimberg Center. The Shimberg Center team also included Professor William J. O'Dell, Anne L. Ray, and Douglas A. White. External team members included Marta Strambi-Kramer and James F. (Rick) Graham.

Dr. Williamson facilitated the Fair Housing planning process in collaboration with the City of Jacksonville's Wight Greger, Director of the Housing and Neighborhoods Department, and LaCree Carswell, Chief, Community Development Division. Numerous other City of Jacksonville management and staff also contributed to the Fair Housing planning process.

## ***GEOGRAPHIC COVERAGE***

The Fair Housing planning process for preparation of this Analysis of Impediments to Fair Housing Choice was based on Duval County and its component jurisdictions. The City of Jacksonville and Duval County form a consolidated government, and the vast majority of population is found within this area. However, the County also encompasses four other incorporated areas: Atlantic Beach, Baldwin, Jacksonville Beach, and Neptune Beach.

## ***PARTICIPANTS***

Jacksonville's Fair Housing planning process included members of the public, community stakeholder organizations, neighborhood associations, the Jacksonville Human Rights Commission, the Jacksonville Housing and Community Development Commission, the Jacksonville Housing Authority, the Jacksonville Housing Finance Authority, and the staff of City of Jacksonville, including the Housing and Neighborhoods Department, the Planning and Development Department, and the Division of Military Affairs and Veterans and Disabled Services.

## ***FUNDING***

This report was funded through the City of Jacksonville's Community Development Block Grant program.

## ***RESEARCH METHODOLOGY AND DATA SOURCES***

This Analysis of Impediments has been prepared based on guidelines presented in the *Fair Housing Planning Guide, Volume 1*, published by the U.S. Department of Housing and Urban Development (HUD). The guide is available at <http://www.hud.gov/offices/fheo/images/fhpg.pdf>. Research methods also included reference to current planning practice and relevant literature.

Data sources used in the City of Jacksonville's Fair Housing planning process include the American Community Survey 2006-2008 (three-year estimates), the Community Housing Affordability Strategy (CHAS) 2009 data produced by the U.S. Census Bureau as a special tabulation for HUD, Census 2000, and data produced by the Shimberg Center for Housing Studies at the University of Florida. Additional data related to the Home Mortgage Disclosure Act (HMDA) was obtained from the Federal Financial Institutions Examination Council (FFIEC). Certain data produced as part of CHAS 2009 is available only at the county level. HMDA data are only available for the entire Jacksonville, Florida, Metropolitan Statistical Area (MSA). The Jacksonville MSA is made up of Duval, Baker, Clay, Nassau, and St. Johns Counties.

## ***REPORT ORGANIZATION***

The AI is organized in seven sections. These sections include:

- Section I: Introduction
- Section II: Community Profile
- Section III: Housing and Land Use Policy Review
- Section IV: Fair Housing Status
- Section V: Community Input
- Section VI: Additional Fair Housing Evidence
- Section VII: Impediment to Fair Housing Choice and Fair Housing Action Plan

## *Section II: Community Profile*

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This section provides information on Jacksonville's demographics and housing affordability. Jacksonville's population data are shown by race, ethnicity, age, disability status, familial status, and income. Further, household characteristics including household size and single-parent households are presented. Minority concentration information is presented in both tabular form and maps. Finally, housing affordability information is presented using the cost burden measure.

### ***GENERAL DEMOGRAPHICS***

The City of Jacksonville grew 9.4% between the 2000 Census and American Community Survey (ACS) estimates for the period 2006-2008. Although somewhat slower than Florida's 15.3% growth rate for the same period, the City's growth rate was higher than the 7% figure for the U.S. as a whole. Table 1 provides population data based on race and ethnicity. It is important to note that racial and ethnic designations are separate criteria for the purpose of making a Census count. For instance, a person may be of any race but also be of Hispanic or Latino ethnicity. Thus, total population figures are a summation of people by race; this includes persons who are also of Hispanic or Latino ethnicity.

*Table 1. Population by Race and Ethnicity*

Race/Ethnicity	Census 2000	Percent of Population	ACS 2006-2008	Percent of Population	Percent Change 2000 to 2006-2008
White alone	474,307	64.5%	501,590	62.3%	5.8%
Black or African-American alone	213,514	29.0%	242,373	30.1%	13.5%
American Indian or Native American alone	2,474	0.3%	2,587	0.3%	4.6%
Asian alone	20,427	2.8%	28,066	3.5%	37.4%
Native Hawaiian or Pacific Islander alone	448	0.1%	573	0.1%	27.9%
Some other race alone	9,816	1.3%	14,104	1.8%	43.7%
Two or more races	14,631	2.0%	15,243	1.9%	4.2%
Hispanic or Latino	30,594	4.2%	49,852	6.2%	62.9%
Total Population	735,617		804,536		9.4%

Sources: Census 2000, American Community Survey, 2006-2008

The fastest-growing group in the City of Jacksonville is made up of those who are of Hispanic or Latino ethnicity; this group grew 62.9% between 2000 and 2006-2008. Those who identified themselves as Some Other Race made up the next fastest-growing group (43.7%). They were followed by the Asian group (37.4%) and the Native Hawaiian or Pacific Islander group (27.9%).

The Black or African-American group grew by 13.5% between 2000 and 2006-2008, while those indicating they were White alone increased by 5.8%. Persons who identified themselves as American Indian or Native American alone increased by 4.6%, and those identifying as Two or More Races grew by 4.2%.

Table 2 presents Jacksonville's population by age. Children from infants through age 17 make up the largest component of the population, with 26.0% of the total. Persons age 35 through 44 are the next largest group, representing 15.2% of the population. A further 14.8% of total population is made up of those age 45 through 54, while those age 25 through 34 are 13.5% of the population.

*Table 2. Population by Age*

Age Group	Census 2000	Percent of Population	ACS 2006-2008	Percent of Population	Percent Change 2000 to 2006-2008
0 through 17	196,339	26.7%	209,527	26.0%	6.7%
18 through 24	71,249	9.7%	72,225	9.0%	1.4%
25 through 34	114,352	15.5%	108,530	13.5%	-5.1%
35 through 44	123,558	16.8%	122,290	15.2%	-1.0%
45 through 54	96,664	13.1%	118,724	14.8%	22.8%
55 through 64	57,540	7.8%	89,526	11.1%	55.6%
65 and above	75,915	10.3%	83,714	10.4%	10.3%
Total Population	735,617		804,536		9.4%

Sources: Census 2000, American Community Survey 3-year estimates (2006-2008)

People age 55 through 64 make up 11.1% of Jacksonville’s population, followed by those age 65 and above, who make up 10.4% of the population. The smallest age group is 18 though 24, representing 9.0% of total population.

By far, the largest growth between 2000 and the 2006-2008 estimate period was among persons age 55 through 64, increasing by 55.6%. When viewing persons age 55 and above (combining the 55 through 64 and 65 and above groups), the population of older persons in Jacksonville grew by 65.9%. The 45 through 54 age group grew 22.8% for the period examined, while those 65 and older increased by 10.3%. Children (newborn through age 17) as a group grew 6.7%, while the 18 through 24 group grew 1.4%. Two age groups declined in numbers, with the 25 through 34 and 35 through 44 groups decreasing by 5.1% and 1.0%, respectively.

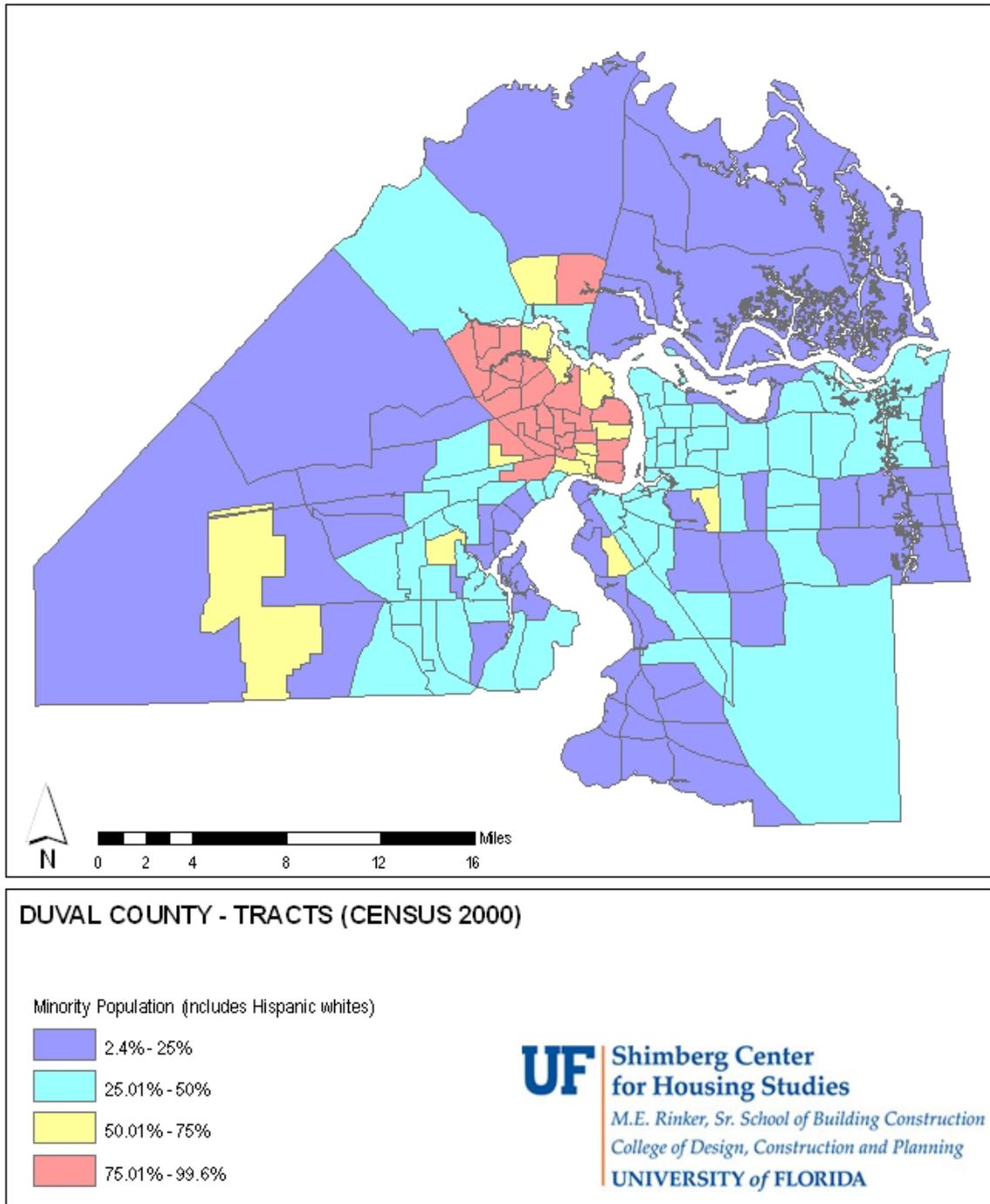
### ***MINORITY CONCENTRATION***

Areas of minority concentration are those where 50% or more of the population is a racial or ethnic minority. Minority concentration is most often measured for Census tracts. A Census tract is a geographic area that typically has between 2,500 and 8,000 residents. The City of Jacksonville has 150 Census tracts, 37 of which have a minority concentration.

Figure 1 through 3 illustrate minority concentration in Duval County. The largest minority concentrations are found in the areas immediately surrounding and to the

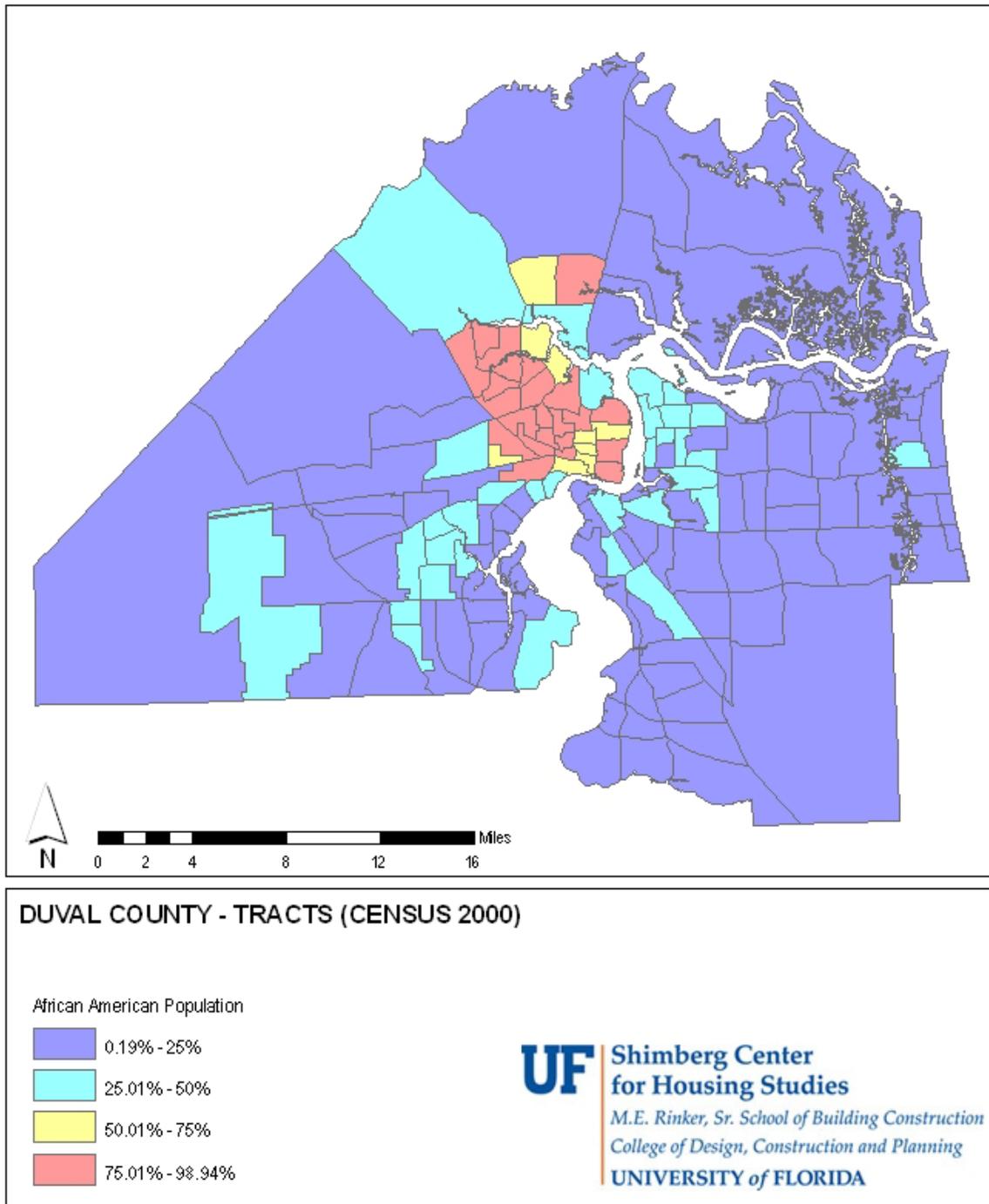
north of downtown Jacksonville. These are areas that have historically been home to African-Americans.

Figure 1. *Minority Concentration*



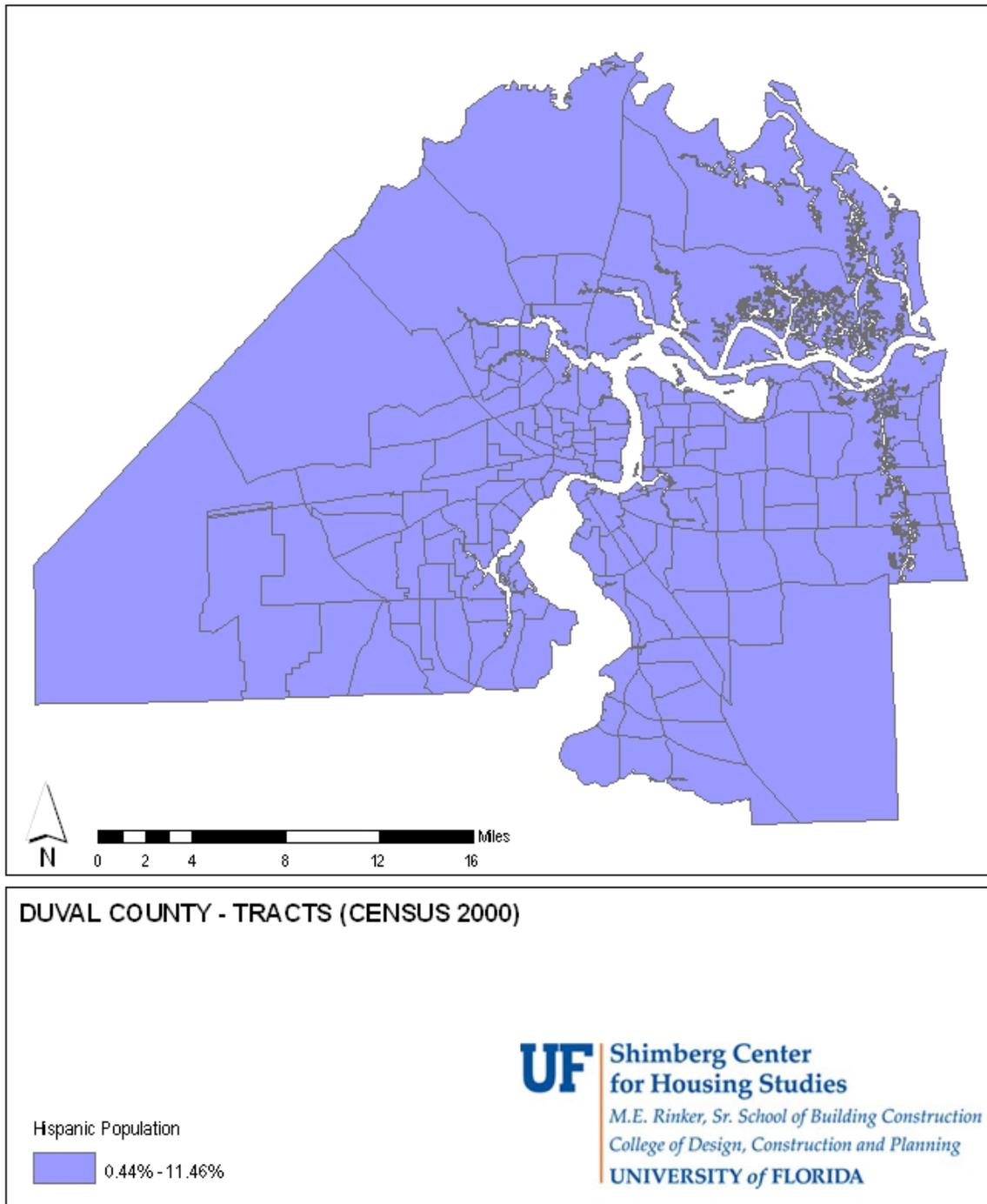
Source: Census 2000

Figure 2. Black or African-American Population



Source: Census 2000

Figure 3. *Hispanic Population*



Source: Census 2000

## PERSONS WITH DISABILITIES

Table 3 contains information on the number of non-institutionalized persons with disabilities in the City of Jacksonville. Of all non-institutionalized persons, 12.6% reported a disability. Disabilities may include (1) hearing difficulty; (2) vision difficulty; (3) cognitive difficulty; (4) ambulatory difficulty; (5) self-care difficulty; or (6) independent living difficulty.

*Table 3. Persons with Disabilities*

Age Group	Number	Percent
Under 5 years	803	1.3%
5 through 17 years	9,215	6.2%
18 through 64 years	56,998	11.4%
65 years and above	33,024	39.5%
Total Non-institutionalized Population	100,040	12.6%

Source: American Community Survey, 2006-2008

The age group with the highest percentage of persons with disabilities is made up of those age 65 years and above, with 39.5% of this population reporting one or more disabilities. Among the 18 through 64 years of age group, 11.4% reported one or more disabilities. Children in the 5 through 17 years group had a 6.2% disability rate, while 1.3% of children under 5 years had a disability.

## PERSONS WITH LIMITED ENGLISH PROFICIENCY

The City of Jacksonville is a diverse community that includes a number of foreign-born individuals with limited English proficiency (LEP). **Error! Reference source not found.** Table 4 provides information on the City's foreign-born population and households where a language other than English is spoken.

*Table 4. Foreign-Born Population and Language Other Than English Spoken at Home*

	2000	2006-2008	Percent Change
Foreign-Born Population (Persons)	43,661	66,888	53.2%
Speak Language Other than English at Home (Households)	65,132	88,156	35.3%

Source: Census 2000; American Community Survey, 2006-2008

The foreign-born population grew dramatically between 2000 and estimates made for the 2006-2008 period, rising 53.2%. The number of households where a language other than English is spoken rose by 35.3%. Although some foreign-born individuals and members of households where a language other than English is spoken may have English proficiency, the rapid growth in these measures in the space of less than a decade indicates that LEP is likely to be a barrier to Fair Housing choice for a number of the City's residents.

## ***HOUSEHOLD CHARACTERISTICS***

The City of Jacksonville is home to an estimated 317,346 households; 63.5% of these households are families.<sup>2</sup> Families with children make up 29.0% of all households. Married couples with children make up 44.1% of all households, while female-headed families (no husband present) with children represent 8.8% of all households. Male-headed families (no wife present) with children make up 2.0% of all households. Table 5 provides details below.

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<sup>2</sup> The U.S. Census Bureau defines a family household as one in which there are two or more related persons (including relationship by marriage). This contrasts with the way the term *familial status* is used for the purpose of defining groups protected under the Fair Housing Act as Amended 1988. Under the Fair Housing Act, familial status refers specifically to families with children.

*Table 5. Households by Familial Status*

Household Type	Number	Percent of Total Households
Total households	317,346	100.0%
Family households (families)	201,532	63.5%
With own children under 18	92,180	29.0%
Married-couple family	139,796	44.1%
With own children under 18	57,865	18.2%
Male householder, no wife, family	14,882	4.7%
With own children under 18	6,243	2.0%
Female householder, no husband, family	46,854	14.8%
With own children under 18	28,072	8.8%
Nonfamily households	115,814	36.5%
Householder living alone	94,964	29.9%
Age 65 or over	24,134	7.6%
		Average Household Size = 2.49 persons
		Average Family Size = 3.13 persons

Source: American Community Survey, 2006-2008

Nonfamily households (which may be made up of one or more unrelated persons) are 36.5% of all households, while individuals living alone account for 29.9% of all households. Persons age 65 or above living alone make up 7.6% of the total households in Jacksonville.

The American Community Survey estimates show 34,315 single-parent households in the City of Jacksonville. These households make up 10.8% of all households in Jacksonville. Single-parent family data are displayed in Table 6.

*Table 6. Single-Parent Households*

	Number	Percent of All Households
Single-parent households	34,315	10.8%

Source: American Community Survey, 2006-2008

HUD defines large households as those with five or more persons. Table 7 provides information on large households in Jacksonville.

*Table 7. Large Households*

	Number	Percent of All Households
Households with 5 or more persons	25,613	8.1%

Source: American Community Survey, 2006-2008

There are an estimated 25,613 large households in the City of Jacksonville. They represent 8.1% of all households.

Table 8 provides data on housing tenure in the City of Jacksonville. Housing tenure refers to whether the occupants own (including those who have a mortgage) or rent their dwelling. Examining occupied housing units first, owner-occupied units make up 64.1% of that figure, while 35.9% of occupied units are rentals. Vacant housing units in Jacksonville are 13.2% of total housing units (both occupied and vacant). This figure is slightly higher than the national vacancy rate of 12.0% for the 2006-2008 period.

*Table 8. Housing Tenure<sup>3</sup>*

	Number	Percent
Owner-occupied housing units	203,434	64.1%
Renter-occupied housing units	113,912	35.9%
Vacant housing units	48,148	13.2%
Total housing units	365,494	100.0%

Source: American Community Survey, 2006-2008

Table 9 provides data on household and family income for the City of Jacksonville. The median household income for the 2006-2008 period was \$49,784, expressed in inflation-adjusted 2008 dollars. The median family income for the same period was \$60,907. The term median income means that one-half of the households or families had more income and one-half had less income.

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<sup>3</sup> Housing tenure percentages (owner or renter status) are based on the total number of occupied housing units. The vacant housing percentage is calculated based on the total number of housing units, both occupied and vacant.

*Table 9. Household Income Distribution<sup>4</sup>*

Household Income	Number of Households	Percent
Less than \$15,000	39,367	12.4%
\$15,000 to \$24,999	32,208	10.1%
\$25,000 to \$34,999	37,590	11.8%
\$35,000 to \$49,999	50,168	15.8%
\$50,000 to \$74,999	64,218	20.2%
\$75,000 to \$99,999	40,522	12.8%
\$100,000 to \$149,999	34,485	10.9%
\$150,000 and above	18,788	5.9%
		Median Household Income = \$49,784 <sup>5</sup>
		Median Family Income = \$60,907

Source: American Community Survey, 2006-2008

Households with incomes below \$25,000 make up 22.5% of all Jacksonville households. In contrast, households with incomes of \$100,000 or more make up 16.8% of all households. Slightly more than one-half (50.1%) of households make less than \$50,000 per year.

Table 10 contains data on persons living in poverty within the City of Jacksonville by race and ethnicity.

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<sup>4</sup> Income data presented in this table are based on 2008 inflation-adjusted dollars.

<sup>5</sup> Both the Median Household Income and Median Family Income figures presented here should be carefully distinguished from annual estimates made by HUD that are adjusted for family size. The data presented in this table are estimates from the American Community Survey, 2006-2008, administered by the U.S. Census Bureau.

*Table 10. Persons in Poverty*

Group	Number	Percent of Racial/Ethnic Group
White alone	42,136	8.6%
Black or African-American alone	50,950	21.5%
American Indian or Native American alone	324	12.7%
Asian alone	2,915	10.4%
Native Hawaiian or Pacific Islander alone	n/a	n/a
Some other race alone	2,513	18.2%
Two or more races	2,305	15.4%
Hispanic or Latino	7,774	15.9%
Total Persons in Poverty	101,166	12.8%

Source: American Community Survey, 2006-2008

Federal housing programs use income categories to describe households as Extremely Low Income (ELI), Very Low Income (VLI), Low Income (LI), Moderate Income (MOD), and Above Moderate Income. Categories are based on HUD estimates of Area Median Income (AMI) produced on an annual basis. Area Median Income (AMI) is adjusted for household size. The most frequently reported figure for AMI is based on a family of four. Table 11 provides a description of federal income categories.

*Table 11. Federal Income Categories*

Federal Income Category	Income Level By Area Median Income (AMI)
Extremely Low Income (ELI)	At or below 30% AMI
Very Low Income (VLI)	Above 30% AMI through 50% AMI
Low Income (LI)	Above 50% AMI through 80% AMI
Moderate Income (MOD)	Above 80% AMI through 95% AMI
Above Moderate Income	Above 95% AMI

Source: HUD, 2010

Table 12 show the distribution of households by federal income category for Duval County. Households in the ELI and VLI categories are 23.2% of all households in the County. LI households make up 18.9% of the County, while Moderate Income households represent 8.4%. Those above moderate income are 49.5% of all Duval County households.

Table 12. Households by Federal Income Category (Duval County)

Federal Income Category	Number	Percent
Extremely Low Income	40,990	12.2%
Very Low Income	36,895	11.0%
Low Income	63,565	18.9%
Moderate Income	28,270	8.4%
Above Moderate Income	166,125	49.5%

Source: Community Housing Affordability Strategy (CHAS), 2009

## HOUSING AFFORDABILITY

Federal guidelines indicate that housing is affordable if a household spends no more than 30% of its *gross* income on housing, including utilities.<sup>6</sup> For owners, this figure includes the mortgage payment (principal and interest), utilities, property taxes, homeowner’s insurance, homeowners’ association dues, and maintenance and repairs. For renters, the figure includes rent and utilities. Households spending more than 30% of gross monthly income for housing are considered *cost burdened*; those spending 50% or more are described as *severely cost burdened*.

Table 13 provides an analysis of housing affordability for Duval County grouped by federal income categories.

Table 13. Housing Cost Burden by Income Category (Duval County)

Income Category	No Cost Burden		Cost Burden		Severe Cost Burden	
	Number	Income Category Percent	Number	Income Category Percent	Number	Income Category Percent
Extremely Low Income	5,210	15.5%	5,340	15.9%	23,070	68.6%
Very Low Income	10,690	29.0%	13,980	37.9%	12,230	33.1%
Low Income	32,490	51.1%	25,345	39.9%	5,730	9.0%
Moderate Income	20,480	72.4%	6,535	23.1%	1,260	4.5%
Above Moderate Income	147,895	89.0%	15,595	9.4%	2,630	1.6%

Source: Community Housing Affordability Strategy (CHAS), 2009

<sup>6</sup> Abt Associates, Inc. 2001. *Study of the Ongoing Affordability of HOME Program Rents: Final Report*. Washington, DC: U.S. Department of Housing and Urban Development, p. vi. Accessed via World Wide Web August 23, 2010 at <http://www.huduser.org/Publications/PDF/ongoing.pdf>.

The majority (68.6%) of ELI households are severely cost burdened, paying 50% or more of gross income for housing each month. Nearly one-third (33.1%) of VLI households are also severely cost burdened. Severe cost burden is much less prevalent among the Low, Moderate, and Above Moderate Income groups, at 9.0%, 4.5%, and 1.6%, respectively.

Figures for simple cost burden—e.g., spending more than 30% but less than 50% of gross income on housing—show that 15.9% of ELI and 37.9% of VLI are cost burdened. Among Low Income household, 39.9% are cost burdened, while 23.1% of the Moderate Income group are cost burdened. Finally, 9.4% of Above Moderate Income households are cost burdened.

Table 14 breaks down housing cost burden by race and ethnicity for Duval County.

*Table 14. Housing Cost Burden by Race/Ethnicity (Duval County)*

Group	Cost Burden	Severe Cost Burden
White alone	18.1%	11.3%
Black or African-American alone	24.9%	19.7%
American Indian or Native American alone	36.0%	7.5%
Asian alone	15.4%	14.5%
Native Hawaiian or Pacific Islander alone	55.6%	8.3%
Some other race	26.1%	13.8%
Hispanic or Latino	30.7%	15.5%
Total	20.1%	13.8%

Source: Community Housing Affordability Strategy (CHAS), 2009

More than one-third (33.9%) of Duval County’s residents experience some level of housing cost burden. Slightly more than one in five (20.1%) of the County’s households experience cost burden, while 13.8% are severely cost burdened.

Examining the issue of cost burden by race and ethnicity, those of Native Hawaiian or Pacific Islander race have the highest percentage of cost burden (55.6%). A further 8.3% of this group is severely cost burdened. Members of the American Indian or Native American group have the next highest level of cost burden at 36.0%. The Hispanic or Latino ethnic group (who may be of any race) reflects a 30.7% rate of cost burden among its members. Households identifying themselves as Some Other Race have a 26.1% rate of cost burden, while 24.9% of Black or African-American households experience housing cost burden. Among White

households, 18.1% are cost burdened. The group with the lowest rate of cost burden (15.4%) is Asian households.

Black or African-American households experience severe housing cost burden most frequently in Duval County, with 19.7% falling into this category. Hispanic or Latino households have the second highest rate, with 15.5% of the group experiencing severe housing cost burden. Households in the Asian group experience severe cost burden at a rate of 14.5%, while those identifying themselves as Some Other Race have a 13.8% severe cost burden rate. The proportion of White households with severe cost burden is 11.3%. Severe cost burden is present among 8.3% of Native Hawaiian or Pacific Islander households, while 7.5% of American Indian or Native American households have this experience.

### *HOUSING, TRANSPORTATION AND EMPLOYMENT LINKAGES*

It is important to consider housing, transportation, and employment when examining barriers to Fair Housing Choice and housing affordability. The Jacksonville-Duval Consolidated Government is geographically the largest local jurisdiction in the United States. This, coupled with existing concentrations of minorities in the Central and Northern portions of the City arising from historical patterns of segregation, point to the desirability of considering transit-oriented development (TOD) as a means of fostering Fair Housing choice.

Growth in jobs is occurring most rapidly in the Southern portion of Jacksonville-Duval County, and many of these jobs are in lower-wage service-sector occupations. However, the Southern—and more suburban—portion of the jurisdiction is not as heavily served by public transportation as the older, more traditional neighborhoods in the Central and North portions of the City. Thus, the lack of TOD in the suburbs is a potential barrier to Fair Housing choice.

## *Section III: Housing and Land Use Policy Review*

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The Fair Housing planning process for the City of Jacksonville included a review of housing and land use policy to determine whether any policy contributes to barriers to Fair Housing choice. The City of Jacksonville's 2030 Comprehensive Plan contains numerous goals, objectives, and policies for addressing Fair Housing, a summary of which is contained below.

### ***AFFORDABLE HOUSING NEEDS***

The Comprehensive Plan provides an estimate of housing needs for the City of Jacksonville through 2030 and promotes an equitable distribution of housing choices. The Comprehensive Plan acknowledges the need for affordable housing and requires the City to provide a wide variety of housing types consistent with the City's housing needs. The goal of the City's Housing Element is to develop stable, sustainable and definable neighborhoods which offer safe, sound, sanitary and energy efficient housing that is affordable to all its present and future residents.

The Plan not only calls for housing opportunities to be provided to low-income and moderate-income households throughout the City, but also offers incentives to encourage the private sector to provide more housing in price ranges accessible to very low, low, and moderate income families. High priority consideration is given to provisions for affordable housing in land development and funding decisions. In addition, the development of workforce and affordable housing is targeted in areas where individuals and families can make the best use of transportation corridors and mass transit.

The Comprehensive Plan contains provisions to ensure that Land Development Regulations allow for sites to be developed for low and moderate income housing, manufactured homes, elderly housing, and group homes. Assistance is provided to private sector and other public and nonprofit agencies with site location, preparation of plans, and infrastructure improvements for affordable housing for low income families, elderly housing, farm workers, manufactured home parks or subdivisions, group homes, and foster care facilities. The Comprehensive Plan also calls for the City to ensure that all available state and federal programs are utilized to provide sites for affordable housing. Funding sources such as HOME, Community

Development Block Grants (CDBG), State Housing Initiatives Partnership Program (SHIP), and private funding are employed to help increase home ownership for low and moderate income families, renovate existing dwelling units for affordable rental units, and build new affordable rental units.

(See FLUE Policy 2.2.3, Objective 3.1 and Policies 3.1.7, 3.1.8, and 6.3.3; also see Housing Element Goal 1, Objective 1.1, Policy 1.1.1, Policy 1.1.5, Objective 1.2, Policies 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.5, 1.2.6, 1.2.8, 1.2.11, 1.2.17, Objective 1.3 and Policies 1.3.1, 1.3.2, 1.3.4, 1.3.4, 1.3.5, 1.3.6, and 1.3.7)

### ***MIX OF HOUSING TYPES***

The 2030 Comprehensive Plan addresses the creation of a mix of housing types in correlation with provisions for affordable housing. Both the Future Land Use Element (FLUE) and Housing Element (HE) encourage the building of a wide variety of housing types, designs, and price ranges by providing incentives such as higher densities or special design considerations within the Land Development Regulations. The Future Land Use Element (FLUE) calls for a well-balanced mix of uses served by a convenient and efficient transportation network. The FLUE also requires the City to provide for development of a range of housing types by area, consistent with the housing needs and socioeconomic profiles of Jacksonville's households.

The Housing Element encourages a variety of multifamily housing opportunities, including a percentage of affordable housing units in the core city near large employment centers. The Housing Element also requires that all redevelopment plans supported by the City to include provisions for a variety of replacement housing types in order to ensure that activities on the sites do not diminish the existing supply of affordable housing.

(See FLUE Goal 3 and Policies 3.1.6 and 3.1.11; also see Housing Element Policy 1.2.14, Objective 1.3, Policy 1.3.2, Objective 1.4, Policies 1.4.3, 1.4.13, 1.5.1, 1.5.4, Objective 1.7, and Policies 1.7.1 and 1.7.4)

### ***SPECIAL NEEDS HOUSING***

The Comprehensive Plan defines special needs as those individuals who are victims of domestic violence, elderly, disabled or handicapped for reasons which may be physical, mental, emotional or due to infirmity associated with AIDS or other terminal illnesses. The Housing Element requires the City to provide assistance to the private sector and non-profit providers of housing for individuals with special

needs, including the frail elderly, physically or mentally disabled, and victims of domestic violence in order to ensure that there is an adequate supply of housing to meet the needs of the special needs population.

The Comprehensive Plan calls for group homes, foster care facilities, adult congregate living facilities, halfway houses, and similar special needs housing to be treated fairly in their distribution throughout Jacksonville. The Plan allows licensed family care homes to be located in all residential categories and zoning districts as long as all distance limitations are met and the facilities are developed in accordance with the criteria contained in the Zoning Code.

The Comprehensive Plan calls for the City to monitor the availability for special needs housing and to ensure that provisions are in place to assist the special needs population in becoming responsible homeowners. Further the Comprehensive Plan calls for the City to implement funding programs to help meet the housing requirements for special needs groups.

(See Housing Element Objective 1.7, Policies 1.7.1, 1.7.4, 1.7.6, 1.7.7, Objective 1.10, and Policies 1.10.1 and 1.10.2)

## *INCENTIVES AND PROGRAMS*

The 2030 Comprehensive Plan contains provisions for various programs and incentives with the intention of removing barriers to affordable housing. The Housing Element calls for the City's Land Development Regulations to include incentives such as higher densities or special design considerations in order to encourage a wide variety of housing types and price ranges throughout Jacksonville. The Comprehensive Plan also calls for the City to review its Land Development Regulations to ensure that incentives are included for infill projects and to encourage the creation of affordable infill housing.

The Comprehensive Plan calls for the City to pursue means of leveraging funds and resources for the creation of additional affordable housing units and for the administration of down payment assistance programs for low and moderate income families in Duval County. The Housing Element also calls for implementation of the Affordable Housing Incentive Plan Ordinance (Ord. 93-2047-1194), which contains a series of specific programs and actions to streamline the City's permitting process for affordable housing developments.

The Comprehensive Plan contains provisions for publicizing the availability of programs available to persons in need of affordable housing. Further, the Plan calls

for the implementation of programs designed to encourage conservation of existing housing and to increase the amount of rehabilitated low and moderate income housing. Technical assistance is also provided to groups or individuals interested in conserving or rehabilitating structures in older neighborhoods of the City.

(See Housing Element Policies 1.1.1, 1.1.2, 1.2.1, 1.2.2, 1.2.7, 1.2.12, 1.2.13, 1.2.14, 1.2.15, 1.2.18, 1.3.2, 1.3.5, 1.4.8, 1.4.12, 1.5.2, 1.6.1, 1.7.5, 1.7.6, 1.7.7, and 1.11.3)

## *Section IV: Fair Housing Status*

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This section contains an examination of the City of Jacksonville's Fair Housing status. This includes analysis of Fair Housing complaints, complaint outcomes, and evaluation of Home Mortgage Disclosure Act (HMDA) data.

### *JACKSONVILLE HUMAN RIGHTS COMMISSION*

The Jacksonville Human Rights Commission (JHRC) has its roots in the Civil Rights Movement of the 1960s. Originally established as the Community Relations Commission, the JHRC exists to ensure that all Jacksonville residents enjoy a community free of discriminatory practices.

The JHRC is responsible for receiving and investigating Fair Housing complaints, as well complaints related to employment discrimination. The Commission conducts extensive public outreach activities, including a Study Circle program, an annual Fair Housing Symposium, Fair Housing training for property management and staff, and Fair Housing awareness training for tenants.

### *FAIR HOUSING COMPLAINTS*

The Jacksonville Human Rights Commission (JHRC) is responsible for ensuring that citizens have the right of equal opportunity and equal access to employment. Their responsibilities include oversight and enforcement actions on issues associated with housing discrimination. JHRC provided data on housing discrimination complaints, outcomes, and methods of disposition for the five-year period beginning July 1, 2005 and ending June 30, 2010 as part of the Fair Housing planning process.

Table 15 provides information on Fair Housing complaints made in Duval County for the five-year period examined. Complaints based on race or disability typically are the largest proportion of those received each year.

*Table 15. Duval County Fair Housing Complaints<sup>7</sup> by Fiscal Year*

Issues	07/01/05 – 06/30/06	07/01/06 – 06/30/07	07/01/07 – 06/30/08	07/01/08 – 06/30/09	07/01/09 – 06/30/10
Race	10	10	10	6	7
Sex		1	1		1
National Origin	4	4	4	1	2
Familial Status	6	2			3
Disability	10	2	9	9	10
Race / Familial Status	2	1	1		1
National Origin / Race	1				
Race / Disability	1			1	3
Race / Religion		1			
Race / Sex	1	1			
Race/Sex/Disability		1			1
National Origin/Sex		1			
Sex/National Origin/ Disability					1
Race/Disability/Familial Status					1
Number of Complaints Resolved by Fiscal Year	35	24	25	17	30

Source: Jacksonville Human Rights Commission

Table 16 presents information on the disposition of Fair Housing complaints. Over the five-year period, 28.3% of complaints were found to have no cause. Conciliation was successful for 31.9% of complaints, while 19.3% were waived to HUD for investigation and/or resolution. Withdrawal without resolution occurred in 7.8% of the reported complaints.

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<sup>7</sup> Each Fair Housing complaint filed may identify one or more causes for suspected discrimination. Thus, the number of issues identified in this table's columns is greater than the number of complaints filed.

*Table 16. Duval County Disposition of Fair Housing Complaints by Fiscal Year*

Fiscal Years	07/01/05 – 06/30/06	07/01/06 – 06/30/07	07/01/07 – 06/30/08	07/01/08 – 06/30/09	07/01/09 – 06/30/10	Category Totals
No Cause Determination	5	11	12	3	16	47
Lack of Jurisdiction	1	1	1		1	4
Conciliation Successful	27	9	8	6	3	53
Withdrawn W/O Resolution		3		4	6	13
Withdrawn with Resolution	2		3	3		8
Failed to Cooperate			1		3	4
Unable to locate Complainant				1	1	2
Reasonable Cause				2	3	3
Waived to HUD	3	11	4	7	7	32
Fiscal Year Totals	38	35	29	26	40	166

Source: Jacksonville Human Rights Commission

## ***HOME MORTGAGE LOAN ORIGINATIONS***

In addition to detecting housing discrimination through formal complaint processes, potential discrimination in home mortgage lending in the Jacksonville Metropolitan Statistical Area (MSA) was analyzed by review of Home Mortgage Disclosure Act (HMDA) data. These data were analyzed for 2007 and 2009. Data for these two years represent dramatically different housing markets, as the mortgage foreclosure crisis was not yet fully underway in 2007. The post-foreclosure crisis market represented by 2009 data is more representative of the current state of mortgage lending in the MSA.

Table 17 presents data on home mortgage loan approvals and denials by race and ethnicity for 2007.

*Table 17. Home Mortgage Disclosure Act Loan Data by Race/Ethnicity, 2007<sup>8</sup>*

Race/Ethnicity	Loans Approved	Percent by Race/Ethnicity	Loans Denied	Percent by Race/Ethnicity
White alone	9,441	78.7%	2,554	21.3%
Black or African-American alone	2,901	57.4%	2,155	42.6%
American Indian or Native American alone	66	66.7%	33	33.3%
Asian alone	589	76.3%	183	23.7%
Native Hawaiian or Pacific Islander alone	101	70.1%	43	29.9%
Hispanic or Latino	1,149	52.5%	575	26.3%

Source: Federal Financial Institutions Examination Council (FFEIC), 2007

Table 18 provides Home Mortgage Disclosure Act Loan data by race and ethnicity for 2009.

*Table 18. Home Mortgage Disclosure Act Loan Data by Race/Ethnicity, 2009<sup>9</sup>*

Race/Ethnicity	Loans Approved	Percent by Race/Ethnicity	Loans Denied	Percent by Race/Ethnicity
White alone	4,797	67.3%	1,034	14.5%
Black or African-American alone	1,238	57.7%	532	24.8%
American Indian or Native American alone	35	57.4%	15	24.6%
Asian alone	272	64.8%	68	16.2%
Native Hawaiian or Pacific Islander alone	46	68.7%	10	14.9%
Hispanic or Latino	429	62.7%	149	21.8%

Source: Federal Financial Institutions Examination Council (FFEIC), 2009

HMDA data indicate certain differences in approval and denial rates among different racial and ethnic groups. Some of these differences may arise from the fact that race and ethnicity remain highly linked with employment opportunities and financial status in the U.S. However, it is unlikely that this alone can explain the differences

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<sup>8</sup> Loan approval and denial percentages are calculated based on the total number of applications, including those approved, denied, and with other dispositions. Other dispositions include withdrawals by the applicant.

<sup>9</sup> Loan approval and denial percentages are calculated based on the total number of applications, including those approved, denied, and with other dispositions. Other dispositions include withdrawals by the applicant.

shown in the mortgage loan data. Differences in home mortgage approval or denial rates may indicate a cause for concern about discriminatory lending practices.<sup>22</sup>

For instance, Black or African-American mortgage applicants had the highest denial rate among the racial and ethnic groups examined, with 42.6% of these applicants experiencing a home loan denial. Members of the American Indian or Native American group had the next highest denial rate at 33.3%. They were followed by the Native Hawaiian or Pacific Islander group, which had a 29.9% denial rate. Asians experienced loan denial 23.7% of the time, while the White group was denied 21.3% of the time. Hispanic applicants were denied 26.3% of the time. Comparing the two largest minority groups in the Jacksonville MSA, Black or African-American applicants' denial rate was substantially higher than that for Hispanic applicants in 2007.

Examining differences in home mortgage approval rates for racial and ethnic groups between 2007 and 2009, the largest were found in the White alone and Hispanic or Latino categories. Approval rates for White alone *dropped* from 78.7% to 67.3% between 2007 and 2009, while approvals for Hispanic or Latino applicants *rose* from 52.5% to 62.7% for the same period. Rates for Black or African-American applicants were nearly unchanged from 2007 to 2009.

## ***HIGH-COST MORTGAGE LOANS***

In addition to loan application and disposition data, the Home Mortgage Disclosure Act requires reporting of high-cost mortgage loans. For a first lien (e.g., the primary loan used to finance the property) mortgage, a mortgage is considered to be high cost if it is priced three percentage points higher than a U. S. Treasury security with similar maturity. For example, a 30-year mortgage for the purchase or refinance of a home would be considered high cost if it was at a rate of 10% annual interest and the rate of a 30-year Treasury bond was 7%. These figures are for illustrative purposes only; the actual levels will vary with current market conditions.

A second-lien loan—often a home equity loan—is considered to be high cost if its interest rate is five percentage points higher than a U. S. Treasury security of the same maturity. The spread between the home mortgage loan and the U. S. Treasury security is wider in the case of a second-lien loan, because these loans are (a) typically considered riskier than first-lien mortgages; and (2) are, therefore, typically priced higher than rates for a first-lien mortgage. As an example, a 30-year second-lien loan would be considered high cost if it was priced at 12% annual interest when the 30-year Treasury bond rate was 7%. As with the first-lien

example, these figures are for illustrative purposes only; actual rates will vary with market conditions.

The high-cost designation is intended to capture the subprime lending market. As with loan origination data, information is reported by race and ethnicity. Any differences in subprime lending by race or ethnicity may be cause for concern that there are underlying differences in how loans are priced based on racial or ethnic discrimination.<sup>10</sup> Table 19 provides information on high-cost mortgage loans in the Jacksonville MSA for 2007 and 2009.

*Table 19. High-Cost Mortgage Loans, 2007 and 2009*

Race/Ethnicity	2007			2009		
	High Cost	Non-High Cost or Unknown	Percent High Cost	High Cost	Non-High Cost or Unknown	Percent High Cost
White alone	1,168	7,448	13.6%	224	4,316	4.9%
Black or African-American alone	743	1,916	27.9%	118	1,099	9.7%
American Indian or Native American alone	8	52	13.3%	1	33	2.9%
Asian alone	55	417	11.7%	10	244	3.9%
Native Hawaiian or Pacific Islander alone	15	77	16.3%	4	41	8.9%
Hispanic or Latino	227	756	23.1%	21	392	5.1%
Not Available	276	1,462	15.9%	55	928	5.6%
Total	2,265	11,372	16.6%	412	6,661	5.8%

Source: Federal Financial Institutions Examination Council (FFEIC), Home Mortgage Disclosure Act Data, 2007 and 2009

The total proportion of high-cost loans fell dramatically from 2007 to 2009, from 16.6% of loans made to 5.8%. High-cost loans fell most among Black or African-Americans, from 27.9% in 2007 to 9.7% in 2009. Despite this trend, Blacks or African-Americans remained the group with the highest proportion of high-cost loans in the Jacksonville MSA in 2009. There was little difference between the proportions of high-cost loans among Hispanic or Latino borrowers as compared with members of the White alone group in 2009. This represents a substantial improvement over results for 2007.

<sup>10</sup> For further information on high-cost mortgage loans and reporting under the Home Mortgage Disclosure Act, see Frequently Asked Questions at <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20060403a1.pdf>.

## *Section V: Community Input*

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The City of Jacksonville's Fair Housing planning process included substantial outreach efforts to obtain community input. In addition to traditional public meetings, the process included multiple stakeholder organization meetings, as well as interviews with key individuals familiar with community conditions.

### ***LACK OF AVAILABLE AFFORDABLE HOUSING***

Community input indicated a continuing lack of available affordable housing in the Jacksonville area. This creates an especially challenging environment for ELI households, who reportedly have difficulty finding affordable rental units in good condition and in safe neighborhoods. The fall in housing prices associated with the foreclosure crisis has not alleviated the mismatch between demand and supply of housing units affordable for low-income households; indeed, it may have exacerbated it, by forcing those who suffer foreclosure back into the rental market.

Persons with disabilities have additional challenges in obtaining affordable housing. The stock of housing for rent or sale that has been adapted for physical accessibility or use by sight- or hearing-impaired individuals is limited. Further, landlords who operate on the basis of a single or a few units are unable to afford modifications to their rental units. In addition, there is a need for units for sale with physical accessibility features that would be affordable to low- and moderate-income households that include persons with disabilities.

The disabilities community includes persons with developmental disabilities, a group that is frequently overlooked in discussions related to disability housing. While these individuals may not require modifications for accessibility, they are often in the extremely low income group and have difficulty finding housing they can afford and thereby achieve independent living.

Another group with special challenges in obtaining safe, decent affordable housing is the population of persons with limited English proficiency. Jacksonville is home to a growing and extremely diverse community of international persons, many of whom have been granted political asylum. Their financial resources most often place them in the ELI group, and language barriers further compound the

challenges associated with a constrained supply of housing affordable to ELI households.

### *NONPROFIT CHALLENGES*

The global financial crisis—particularly that part of it associated with the dramatic decline of the for-sale housing market—has negatively impacted Jacksonville’s nonprofit community network. This is particularly true for those organizations with business lines that formerly focused on development and sale of single-family residences to low- and moderate-income people. This market has moved from booming to nearly non-existent in the wake of the foreclosure crisis. This translates into strong challenges to the financial viability of many of Jacksonville’s nonprofit housing organizations with experience in serving low- and moderate-income housing needs.

Opportunities exist for nonprofit housing and social service organizations to create new ways to serve the housing needs of Jacksonville’s low- and moderate-income households, particularly through refocusing business lines and building collaborative working relationships. For instance, housing advocates and social service providers see needs for various types of housing assistance—including construction or rehabilitation of existing structures to serve various special needs groups, among other opportunities—and these needs may be able to be met by Jacksonville’s nonprofit housing providers through new collaborations with these advocates and service providers.

### *HOUSING CONDITION*

Participants in several venues expressed concern about the condition of available rental housing units in Jacksonville, particularly among the stock of older subsidized housing. Input included requests that information about property owners associated with housing in poor condition—particularly owners of multifamily developments in poor condition—be made easily available to the public. Further, requests were made for additional action on the part of the City’s building code enforcement staff and the City Council to address poor conditions where they exist.

Housing condition is an important consideration in the Fair Housing planning process. When housing in poor condition exists, the likelihood that those most vulnerable—including members of protected groups and the lowest-income households—will be forced into these units by economic circumstances.

### *LITTLE INPUT REGARDING OVERT HOUSING DISCRIMINATION*

Although community input regarding specific instances or concerns about housing discrimination was sought at every public, stakeholder, and neighborhood association meeting, community input focused on the challenges associated with the current housing market and economic conditions in general. This does not mean that housing discrimination is not a concern among Jacksonville's residents, but rather is more likely to indicate that the current crisis overshadows it. Further, in an environment of economic crisis (even with recovery underway) housing discrimination may be more likely to occur, since people of low and moderate income will often have fewer choices when making housing decisions.

## *Section VI: Additional Fair Housing Evidence*

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The City of Jacksonville's Fair Housing planning process included analysis of evidence regarding public knowledge about, and experience with, Fair Housing law and discrimination based on several national studies sponsored by HUD. Results from HUD-sponsored research were used in combination with the results of local outreach efforts to identify the City's barriers to Fair Housing choice and develop a set of interventions for addressing these barriers.

### *PUBLIC KNOWLEDGE ABOUT FAIR HOUSING*

HUD commissioned a survey administered by the Urban Institute in late 2000 and 2001 to determine the level of public knowledge about the provisions of Fair Housing law. Results indicated that the majority of Americans were aware of Fair Housing law, although knowledge varied across provisions of the law.<sup>11</sup> For instance, public awareness of Fair Housing law as it applies to persons with disabilities and families with children was more limited than awareness of provisions related to race, national origin, or religion. Further, public knowledge about Fair Housing as it relates to real estate search practices was also limited.

A follow-up study was conducted in 2005, again commissioned by HUD, to determine whether public knowledge about Fair Housing had changed since the survey conducted in 2000 and 2001.<sup>12</sup> Although overall knowledge about Fair Housing changed little during the period between the national surveys, there was improvement in public knowledge about two issues. The first was in knowledge about the prohibition against "steering"—a practice where a real estate professional attempts to steer a housing seeker towards a neighborhood or area consistent with the seeker's race or ethnicity. Second, knowledge about treatment of families with children improved over time, with more people understanding the protections offered families under the Fair Housing Act as amended in 1988.

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<sup>11</sup> Martin D. Abravanel and Mary K. Cunningham, "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws," U. S. Department of Housing and Urban Development, 2002.

<sup>12</sup> Martin D. Abravanel, "Do we Know More Now? Trends in Public Support, Knowledge and Use of Fair Housing Law," U. S. Department of Housing and Urban Development, 2006.

In contrast, evidence suggests that knowledge about housing discrimination based on religion declined between the 2000-2001 and 2005 surveys. A smaller proportion of respondents in the 2005 survey correctly identified a scenario where “Christian tenants” were mentioned in an advertisement as a violation of Fair Housing law than did respondents in the earlier survey.

Public knowledge about Fair Housing law is critical to efforts to eliminate housing discrimination and affirmatively further Fair Housing choice. Thus, while the majority of the public appears to possess general knowledge about prohibitions against housing discrimination, efforts to continue to educate the public on the multiple facets of Fair Housing law are likely required to ensure Fair Housing choice throughout the country.

### ***PUBLIC SUPPORT FOR FAIR HOUSING LAW***

The results of the 2000-2001 survey indicated that the majority of Americans supported Fair Housing law, particularly as it relates to discrimination based on race or ethnicity. Further, support for Fair Housing law grew between this survey and the 2005 survey. Public support of Fair Housing law is an important contributor in efforts to affirmatively further Fair Housing choice.

### ***REAL ESTATE PROFESSIONALS AND FAIR HOUSING***

Yinger (1997) analyzed results from HUD’s Housing Discrimination Study conducted in 1989 and found that real estate professionals may discriminate based on the perception that their non-minority clients prefer for them to do so.<sup>13</sup> Thus, educating real estate professionals not only about the legal requirement to adhere to Fair Housing law, but also about survey results indicating that the majority of Americans support the law, can be an important element in affirmatively furthering Fair Housing choice.

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<sup>13</sup> John Yinger, *Closed Doors, Opportunities Lost: The Continuing Costs of Housing Discrimination*. (New York: Russell Sage Foundation, 1997).

## *Section VII: Impediments to Fair Housing Choice and Fair Housing Action Plan*

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The City of Jacksonville's Fair Housing planning process resulted in identification of impediments to Fair Housing choice and development of a Fair Housing Action Plan for addressing these barriers.

The City of Jacksonville's Fair Housing planning process resulted in identification of impediments to Fair Housing choice and development of a Fair Housing Action Plan for addressing these barriers. This section presents identified barriers and actions and constitutes the City's Fair Housing Action Plan.

**Barrier 1:** Lack of available affordable housing units for persons at all income levels.

Action 1A: The City of Jacksonville will continue its existing programs that foster production and rehabilitation of affordable housing units.

Action 1B: The City of Jacksonville will convene workshops for social service and housing providers (both nonprofit and for-profit) that will facilitate building new collaborative partnerships that will better address unmet affordable housing need. Further, the City will provide selection preferences for collaborative efforts in the competition for resources administered by the City, including those from federal, state, and local sources.

**Barrier 2:** Need for additional education and outreach to the public and members of the real estate industry regarding all provisions of Fair Housing law.

Action 2A: Continue funding for Jacksonville Human Rights Commission at current levels with future adjustments for inflation.

Action 2B: Continue Fair Housing education programs offered by the Jacksonville Human Rights Commission in cooperation with the City's Housing and Neighborhoods Department and community partners.

Action 2C: Examine the financial feasibility of conducting a housing discrimination audit in collaboration with the Jacksonville Human Rights Commission.

**Barrier 3:** A growing Limited English Proficiency (LEP) population faces barriers to Fair Housing choice associated with language. Addressing this barrier is particularly complex, in that growth in the LEP population includes refugees and others from around the world speaking many languages and dialects.

Action 3: The City of Jacksonville will explore the feasibility of funding a part-time English as a Second Language (ESOL) coordinator through the Community Development Block Grant program. This exploration will include determining the most effective site from which the coordinator might work.

**Barrier 4:** Members of special needs groups such as persons with disabilities (which includes physical, mental, and developmental disabilities) and the homeless population (including veterans, families, and others) may have significant barriers to Fair Housing choice due to the limited supply of housing which meets their needs.

Action 4: The City of Jacksonville's Housing and Neighborhoods Department will convene workshops designed to facilitate collaboration among various community partners, including, but not limited to, service providers, advocates, and housing organizations, in an effort to foster effective action in the production of housing opportunities that may include transitional housing, permanent supportive housing, and other intervention strategies.

**Barrier 5:** The global financial crisis resulting from the housing bubble threatens the survival of a number of Jacksonville's nonprofit community organizations. These organizations previously developed new, single-family housing units for sale to low- and moderate-income households. With the shift in the economy and the housing market, this line of business is no longer viable for many nonprofit entities. The loss of nonprofit housing organizations would reduce the City's ability of address barriers to Fair Housing choice.

Action 5: The City of Jacksonville's Housing and Neighborhoods Department will convene a series of workshops designed to facilitate collaboration among housing and service providers to better meet the needs of the City's population, while also building capacity among nonprofit housing and community organizations.

## *CONCLUSION*

This Analysis of Impediments to Fair Housing Choice is the result of an extensive Fair Housing planning process. Most importantly, it represents the City of Jacksonville's commitment to Affirmatively Further Fair Housing.