



City of Jacksonville

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Diana Seydlorsky, Chief – Housing & Community Development Division
NEIGHBORHOODS DEPARTMENT | 214 N. HOGAN STREET 3RD FLOOR JACKSONVILLE FL 32202
904-255-8200

Table of Contents

Section I: Introduction	1
Lead and Participating Agencies	1
Geographic Coverage	2
Participants	2
Research Methodology and Data Sources	2
Report Organization	3
 Section II: Community Profile	 4
General Demographics	4
Minority Concentration	6
Persons with Disabilities	10
Persons with Limited English Proficiency	11
Household Characteristics	11
Housing Affordability	15
Housing, Transportation and Employment Linkages	19
 Section III: Housing and Land Use Policy Review	 21
Affordable Housing Needs	21
Mix of Housing Types	22
Special Needs Housing	22
Incentives and Programs	23
 Section IV: Fair Housing Status	 25
Jacksonville Human Rights Commission	25
Fair Housing Complaints	25
Home Mortgage Loan Originations	27
 Section V: Community Input	 30
Lack of Available Affordable Housing	30

Nonprofit Challenges.....	31
Housing Condition	31
Section VI: Additional Fair Housing Evidence	33
Public Knowledge about Fair Housing	33
Public Support for Fair Housing Law	34
Section VII: Impediments to Fair Housing Choice and Fair Housing Action Plan	35
Impediments.....	39
Conclusion.....	45

List of Tables

Table 1.	Population by Race and Ethnicity	5
Table 2.	Population by Age	6
Table 3.	Low/Mod Census Tracts and Zip Code.....	8
Table 4.	Black or African-American Population	9
Table 5.	Hispanic Population	12
Table 6.	Persons with Disabilities	12
Table 7.	Foreign-Born Population and Language Other Than English	Error! Bookmark not defined.
Table 8.	Households by Familial Status	13
Table 9.	Single-Parent Households	14
Table 10.	Housing Tenure	13
Table 11.	Household Income Distribution	14
Table 12.	Federal Income Categories.....	15
Table 13.	2015 Duval County Wage, Rent, and Affordability	Error! Bookmark not defined.
Table 14.	Housing Cost Burden by Income Level.....	18
Table 15.	Percent of Renters who are Extremely Cost-Burdened	19
Table 16.	Low/Mod Income Job Centers with Transportation Indicators.....	20
Table 17.	Duval County Fair Housing Complaints by Fiscal Year	26
Table 18.	Duval County Disposition of Fair Housing Complaints by Fiscal Year .	28
Table 19.	Home Mortgage Disclosure Act Loan Data by Race/Ethnicity	28
Table 20.	Home Mortgage Disclosure Act Loan Data by Race/Ethnicity	28

Section I: Introduction

The City of Jacksonville, Florida, is a vibrant, diverse community located on Florida's historic Northeastern coast. The City is home to nearly 850,000 people and experienced strong growth in the years since the 2010 Census; however, based on growth ratios by the American Community Survey, the estimated population is near 880,000. 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 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 outreach to citizens and stakeholder organizations, as well as 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 origin¹

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 Community Development Division. Other City agencies involved in this effort included the Jacksonville Human Rights Commission, the

¹ p. 1-3

Planning and Development Department, the Jacksonville Housing and Community Development Commission, the Planning Commission, the Jacksonville Housing Authority, and the Jacksonville Housing Finance Authority.

The staff of the Housing and Community Development Division facilitated the Fair Housing planning process. 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 Reinvestment Fund in partnership with the Jessie Ball DuPont Fund, the Planning Commission, the Jacksonville Housing Finance Authority, the Urban Core, North, Greater Arlington/Beaches, Southeast, Southwest, and Northwest Citizen Participation Advisory Committees, Local Initiatives Support Corporation, the Jacksonville City Council Members, Community Housing Development Organizations, non-profits, social service agencies and the staff of City of Jacksonville, including the Housing and Community Development Division, Neighborhoods Department, the Planning and Development Department, and various other city agencies.

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 2010-2014 (four-year estimates), Census 2000, and data produced by the Shimberg Center for Housing Studies at the University of Florida, the Out of Reach Report by the National Low Income Housing Coalition, , Florida Housing Finance Corporation, the Block by Block Report from the Reinvestment Fund in partnership with the Jessie Ball DuPont Fund, Home Matters Report by the Florida Housing Coalition, and the Council on Homelessness Report by the Department of Children and Families. Additional data related to the Home Mortgage Disclosure Act (HMDA) was obtained from the Federal Financial Institutions Examination Council (FFIEC). Certain data produced is only available 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

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 3.8% between the 2010 Census and American Community Survey (ACS) estimates for the period 2010-2014. Although somewhat slower than Florida's 7.8% 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	ACS 2006-2008	Percent of Population	ACS 2010-2014	Percent of Population	Percent Change 2006-2008 to 2010-2014
White alone	501,590	62.3%	490,026	55.6%	- 6.7%
Black or African-American alone	242,373	30.1%	255,569	29.0%	- 1.1%
American Indian or Native American alone	2,587	0.3%	2,050	0.2%	- 0.1%
Asian alone	28,066	3.5%	36,992	4.2%	0.7%
Native Hawaiian or Pacific Islander alone	573	0.1%	785	0.1%	0%
Some other race alone	14,104	1.8%	10,115	0.2%	- 1.6%
Two or more races	15,243	1.9%	1,797	2.5%	.6%
Hispanic or Latino	49,852	6.2%	71,540	8.1%	1.9%
Total Population	834,388		880,750		6.3%

Sources: American Community Survey, 2010-2014

The fastest-growing group in the City of Jacksonville is made up of those who are of Hispanic or Latino ethnicity; this group grew 8.1% of the estimated population between 2006-2008 and 2010-2014. The Asian group made up the next fastest-growing group (4.2%). They were followed by the group that uses identifiers of two or more races (2.5%) and the Native Hawaiian or Pacific Islander group (0.1%) at a slight margin of increase.

The Black or African-American group reduced by 1.1% of the population between 2006-2008 and 2010-2014, while those indicating they were White alone also decreased by 6.7%. Persons who identified themselves as American Indian or Native American alone decreased by 0.1%, and those identifying as Two or More Races grew by 1.9%.

Table 2 presents Jacksonville's population by age. Children from infants through age 19 make up the second largest component of the population, with 226,223 or 25.7% of the total. The first largest component is made up of the persons age 25 through 54 representing at 376,102 or 42.7% of the population. A further 7.6% of total population is made up of those age 20 through 24, while those age 55 through 59 are 6.4% of the population.

Table 2. Population by Age

Age Group	ACS 2010-2014	Percent of Population
Under 5 years	60,216	6.8%
5 to 9 years	56,528	6.4%
10 to 14 years	54,428	6.2%
15 to 19 years	55,051	6.3%
20 to 24 years	67,128	7.6%
25 to 34 years	135,827	15.4%
35 to 44 years	114,982	13.1%
45 to 54 years	125,293	14.2%
55 to 59 years	56,633	6.4%
60 to 64 years	49,696	5.6%
65 to 74 years	60,213	6.8%
75 to 84 years	30,932	3.5%
85 years and over	13,823	1.6%
Total Population	880,750	

Sources: American Community Survey 4-year estimates (2010-2014)

People age 65 through 74 make up 6.8% of Jacksonville's population, followed by those age 60 through 64 who make up 5.4% of the population. The smallest age group is 85 years and over, representing 1.6% of total population.

The core age group of the population is made of adults representing ages 25 through 54 years of age. This core group denotes a strong presence within Jacksonville and possibly correlates to the population numbers of those settling into vital contributors with no signs of digressing.

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. Table 3 illustrates the 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. Table 4 provides further geographic

identification concerning African-Americans. Table 5 provides geographic identification for Hispanics.

Table 3. Low/Mod Census Tracts and Zip Code

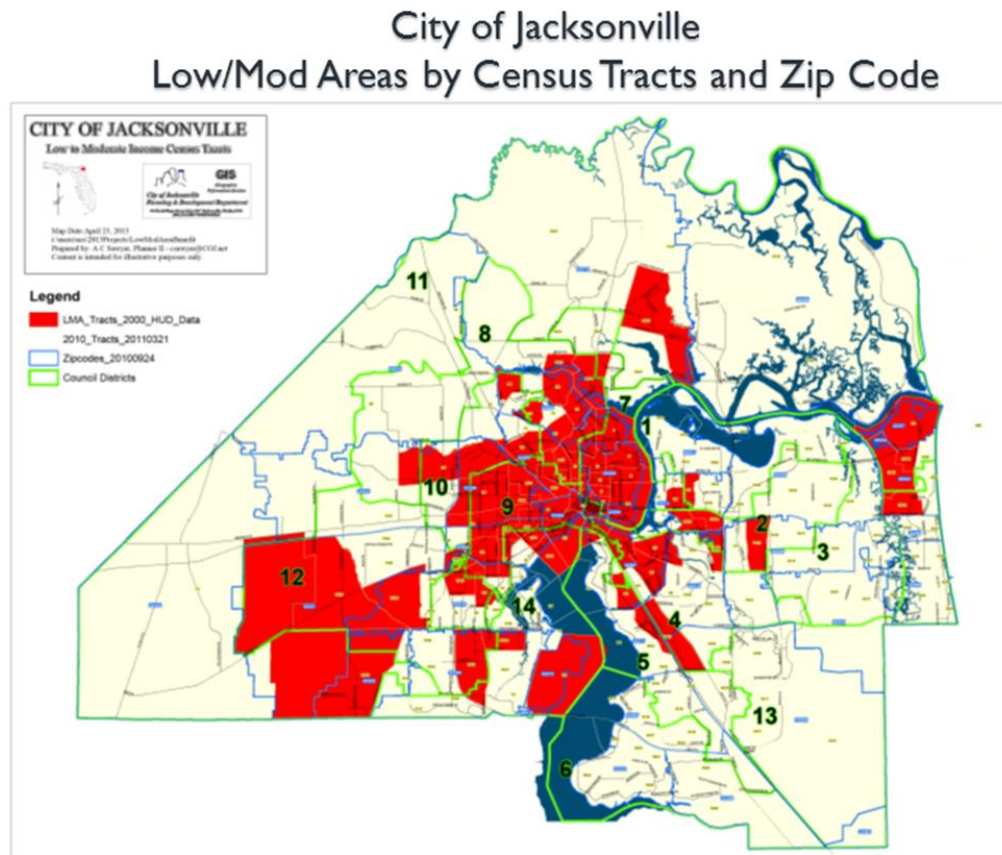
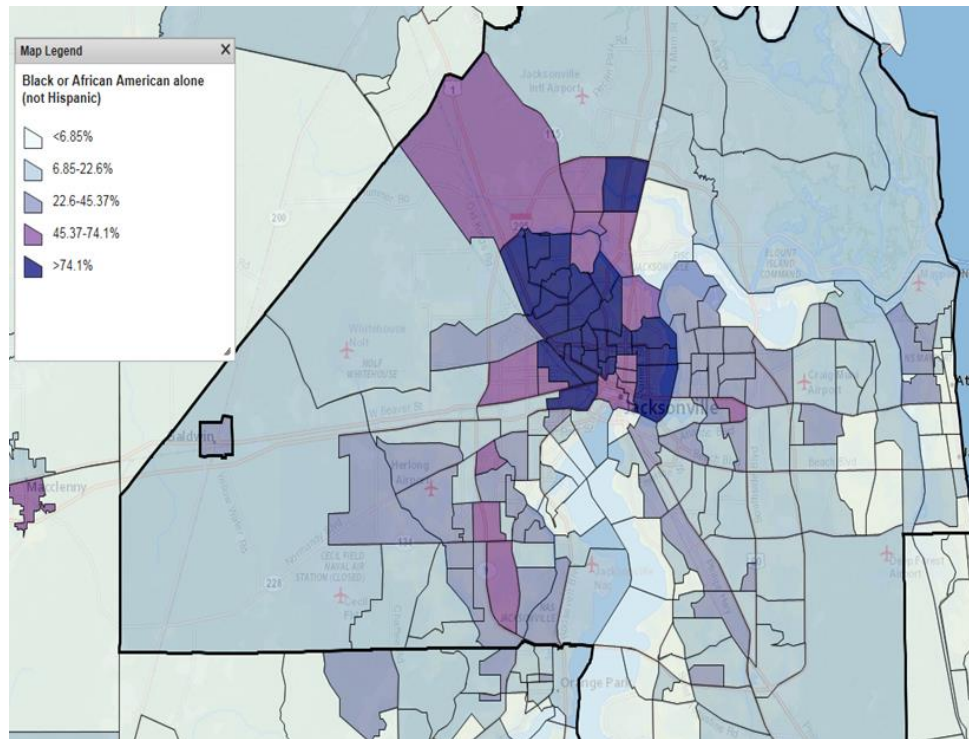
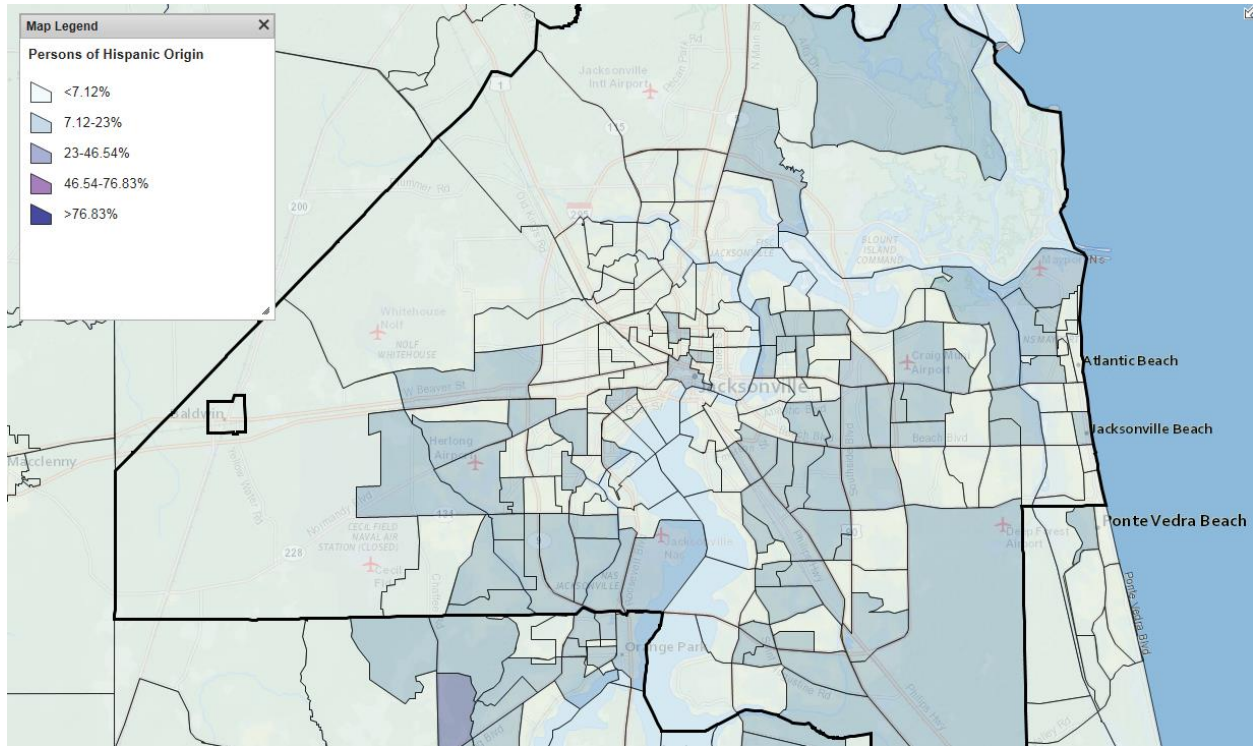


Table 4. Black or African-American Population



Source: CPD Maps (HUD)

Table 5. Hispanic Population



Source: CPD Maps (HUD)

PERSONS WITH DISABILITIES

Table 6 contains information on the number of non-institutionalized persons with disabilities in the City of Jacksonville. Of all non-institutionalized persons, 12.4% 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 6. Persons with Disabilities

Age Group	Number	Percent
Under 18 years	8,574	4.2%
18 to 64 years	61,770	11.1%
65 years and over	39,005	38.2%
Total Non-institutionalized Population	109,349	12.4%

Source: American Community Survey, 2010-2014

The age group with the highest percentage of persons with disabilities is made up of those age 65 years and above, with 38.2% of this population reporting one or more disabilities. Among the 18 through 64 years of age group, 11.1% reported one or more disabilities. Youth under 18 years of age is composed of 4.2% of the population.

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). Table 7 provides information on the City's foreign-born population and households where a language other than English is spoken.

Table 7. Foreign-Born Population and Language Other Than English Spoken at Home

	2010-2014	Percent of Population
Foreign-Born Population (Persons)	84,136	9.6%
Speak Language Other than English at Home (Households)	110,783	13.5%

Source: American Community Survey, 2010-2014

The foreign-born population grew between the 2006-2008 estimates made for the 2000 Census data. The number of households where a language other than English represents 13.5% of the estimated population. 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.² 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

² 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.

households. Male-headed families (no wife present) with children make up 2.0% of all households. Table 8 provides details below.

Table 8. Households by Familial Status

Household Type	Number	Percent of Total Households
Total households	334,721	100.0%
Family households (families)	208,742	62.4%
With own children under 18	89,528	26.7%
Married-couple family	141,303	42.2%
With own children under 18	53,356	15.9%
Male householder, no wife, family	14,573	4.4%
With own children under 18	6,320	1.9%
Female householder, no husband, family	52,866	15.8%
With own children under 18	29,852	8.9%
Nonfamily households	125,979	37.6%
Householder living alone	103,753	31.0%
Age 65 or over	30,206	9.0%
Average Household Size = 2.58 persons Average Family Size = 3.27 persons		

Source: American Community Survey, 2010-2014

Nonfamily households (which may be made up of one or more unrelated persons) are 37.6% of all households, while individuals living alone account for 31.0% of all households. Persons age 65 or above living alone make up 9.0% 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 99.

Table 9. Single-Parent Households

	Number	Percent of All Households
Single-parent households	36,172	10.8%

Source: American Community Survey, 2010-2014

HUD defines large households as those with five or more persons. Table 100 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 2010-2014 period.

Table 10. Housing Tenure³

	Number	Percent
Owner-occupied housing units	201,882	51.0%
Renter-occupied housing units	132,839	34.0%
Vacant housing units	56,998	15%
Total housing units	391,719	100.0%

Source: American Community Survey, 2010-2014

Table 111 provides data on household and family income for the City of Jacksonville. The median household income for the 2010-2014 period was \$47,582, expressed in inflation-adjusted 2008 dollars. The median family income for the same period was \$59,043. The term median income means that one-half of the households or families had more income and one-half had less income.

³ 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 11. Household Income Distribution⁴

Household Income	Number of Households	Percent
Less than \$10,000	28,602	8.5%
\$10,000 to \$14,999	19,612	5.9%
\$15,000 to \$24,999	37,659	11.3%
\$25,000 to \$34,999	38,887	11.6%
\$35,000 to \$49,999	49,339	14.7%
\$50,000 to \$74,999	62,000	18.5%
\$75,000 to \$99,999	38,490	11.5%
\$100,000 to \$149,999	37,083	11.1%
\$150,000 and to \$199,999	11,934	3.6%
\$200,000 or more	11,115	3.3%
Median Household Income = \$47,582 ⁵ Median Family Income = \$59,043		

Source: American Community Survey, 2010-2014

Households with incomes below \$25,000 make up 25.7% of all Jacksonville households. In contrast, households with incomes of \$100,000 or more make up 14.7% of all households. More than one-half (52%) of households make less than \$50,000 per year.

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 12 provides a description of federal income categories.

⁴ Income data presented in this table are based on 2014 inflation-adjusted dollars.

⁵ 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, 2010-2014, administered by the U.S. Census Bureau.

Table 12. 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 31% AMI through 50% AMI
Low Income (LI)	Above 51% AMI through 80% AMI
Moderate Income (MOD)	Above 81% AMI through 120% AMI
Above Moderate Income	Above 120% AMI

Source: HUD, 2016, Florida Housing Finance Corporation

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. For owners, this figure includes the mortgage payment (principal and interest), utilities, property taxes, homeowner's insurance. In the best case scenarios, any homeowners' association dues, maintenance, and repairs are also included; however, most lenders do not consider them within their affordability calculation. 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*.

To fully understand the concept of what it means to be cost burdened, several factors must be simultaneously considered. Some of those factors include the current fair market rents for Jacksonville, the current average wages, the wages needed in order to afford quality housing, and the number of hours needed in order to be able to afford quality housing.

The National Low Income Housing Coalition published the 2015 Out of Reach Report that provides the data within Table 13 to support the level of cost burden within Jacksonville.

Table 13. 2015 Duval County Wage, Rent, and Affordability

Compare Jurisdictions		
	SELECT JURISDICTION: Florida	SELECT JURISDICTION: Duval County
Number of Households		
TOTAL	7,158,980	330,897
RENTER	2,351,983	127,101
PERCENT RENTERS	33%	38%
Housing Wage		
ZERO-BEDROOM	\$13.02	\$12.08
ONE-BEDROOM	\$15.60	\$14.90
TWO-BEDROOM	\$19.47	\$17.90
THREE-BEDROOM	\$26.43	\$23.62
FOUR-BEDROOM	\$31.52	\$28.88
Fair Market Rent		
ZERO-BEDROOM	\$677	\$628
ONE-BEDROOM	\$811	\$775
TWO-BEDROOM	\$1,012	\$931
THREE-BEDROOM	\$1,374	\$1,228
FOUR-BEDROOM	\$1,639	\$1,502

<u>Annual Income Needed to Afford</u>	<i>Florida</i>	<i>Duval County</i>
ZERO-BEDROOM	\$27,077	\$25,120
ONE-BEDROOM	\$32,441	\$31,000
TWO-BEDROOM	\$40,488	\$37,240
THREE-BEDROOM	\$54,964	\$49,120
FOUR-BEDROOM	\$65,556	\$60,080

<u>Minimum Wage</u>	<i>Florida</i>	<i>Duval County</i>
MINIMUM WAGE	\$8.05	\$8.05
RENT AFFORDABLE AT MINIMUM WAGE	\$419	\$419

<u>Work Hours/Week at Minimum Wage</u>	<i>Florida</i>	<i>Duval County</i>
ZERO-BEDROOM	65	60
ONE-BEDROOM	77	74
TWO-BEDROOM	97	89
THREE-BEDROOM	131	117
FOUR-BEDROOM	157	144

<u>Renter Wage</u>	<i>Florida</i>	<i>Duval County</i>
ESTIMATED MEAN RENTER WAGE	\$14.32	\$15.46
RENT AFFORDABLE AT MEAN RENTER WAGE	\$744	\$804

<u>Work Hours/Week at Mean Renter Wage</u>	<i>Florida</i>	<i>Duval County</i>
ZERO-BEDROOM	36	31
ONE-BEDROOM	44	39
TWO-BEDROOM	54	46
THREE-BEDROOM	74	61
FOUR-BEDROOM	88	75

<u>Supplemental Security Income (SSI) Payment</u>	<i>Florida</i>	<i>Duval County</i>
SSI MONTHLY PAYMENT	\$733	\$733
RENT AFFORDABLE TO SSI RECIPIENT	\$220	\$220

<u>Income Levels</u>	<i>Florida</i>	<i>Duval County</i>
30% OF AREA MEDIAN INCOME (AMI)	\$17,482	\$18,990
ESTIMATED RENTER MEDIAN INCOME	\$33,537	\$33,262

<u>Rent Affordable at Different Income Levels</u>	<i>Florida</i>	<i>Duval County</i>
30% OF AREA MEDIAN INCOME (AMI)	\$437	\$475
ESTIMATED RENTER MEDIAN INCOME	\$838	\$832

National Low Income Out of Reach Report 2015

The Out of Reach Report show that based on the median income of any given year, a household should not spend more than \$475 of their income on housing. By doing so, the household would be able to provide for their housing needs based on what is affordable to them; however, the reality is that households are paying at least \$832 using the same scenario. This amount is 57% of a household's income being spent on housing.

If that same household is disabled and/or receives Social Security Disability of \$733, then they cannot afford any rent greater than \$220. The amount of wages and benefits simply do not represent a sufficient amount to cover the housing needs and thus make is extremely cost burdened.

The effect this is having on Jacksonville is reflected in Tables 14 & 15 as contained within the Block by Block Report by the Reinvestment Fund in partnership with the Jessie Ball DuPont Fund.

Table 14. *Housing Cost Burden by Income Level*

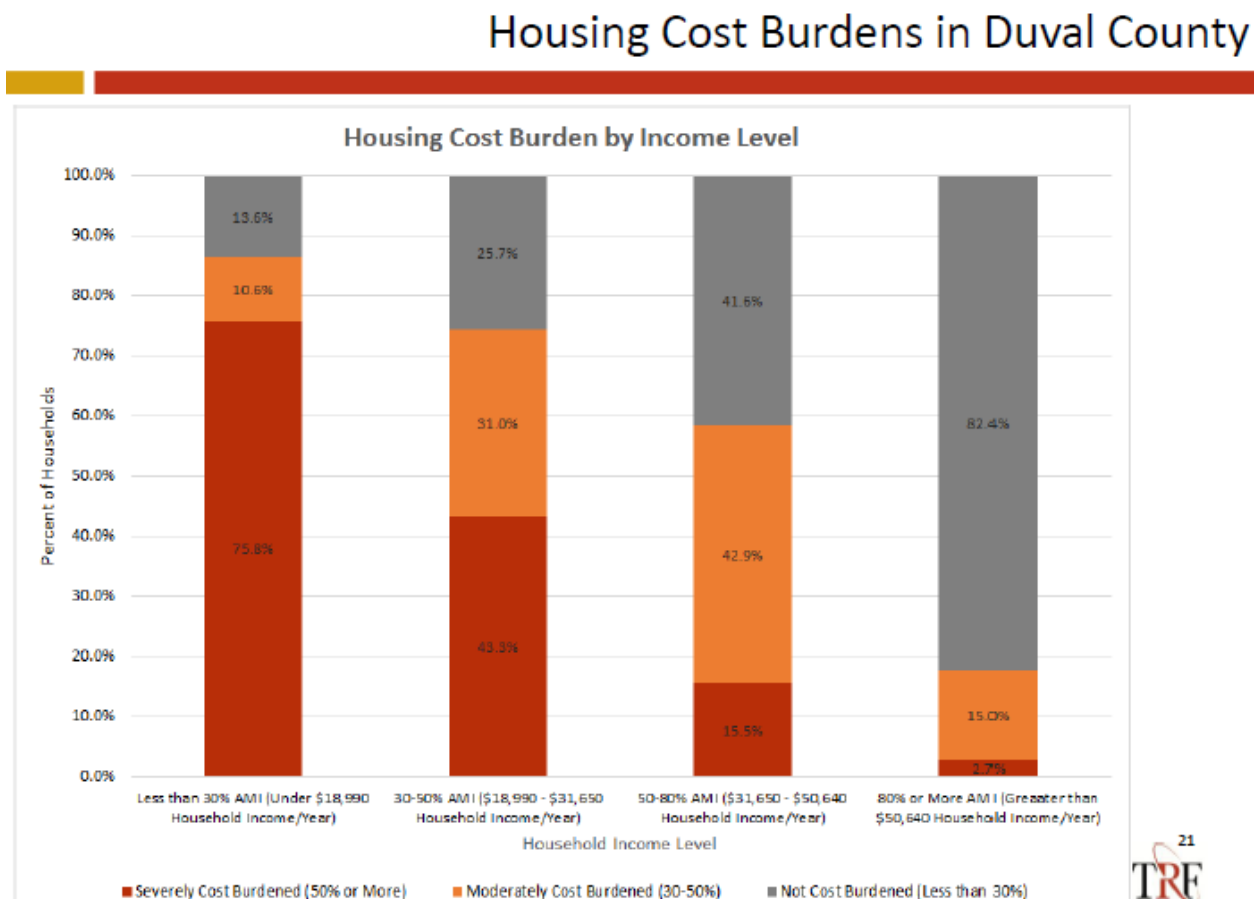
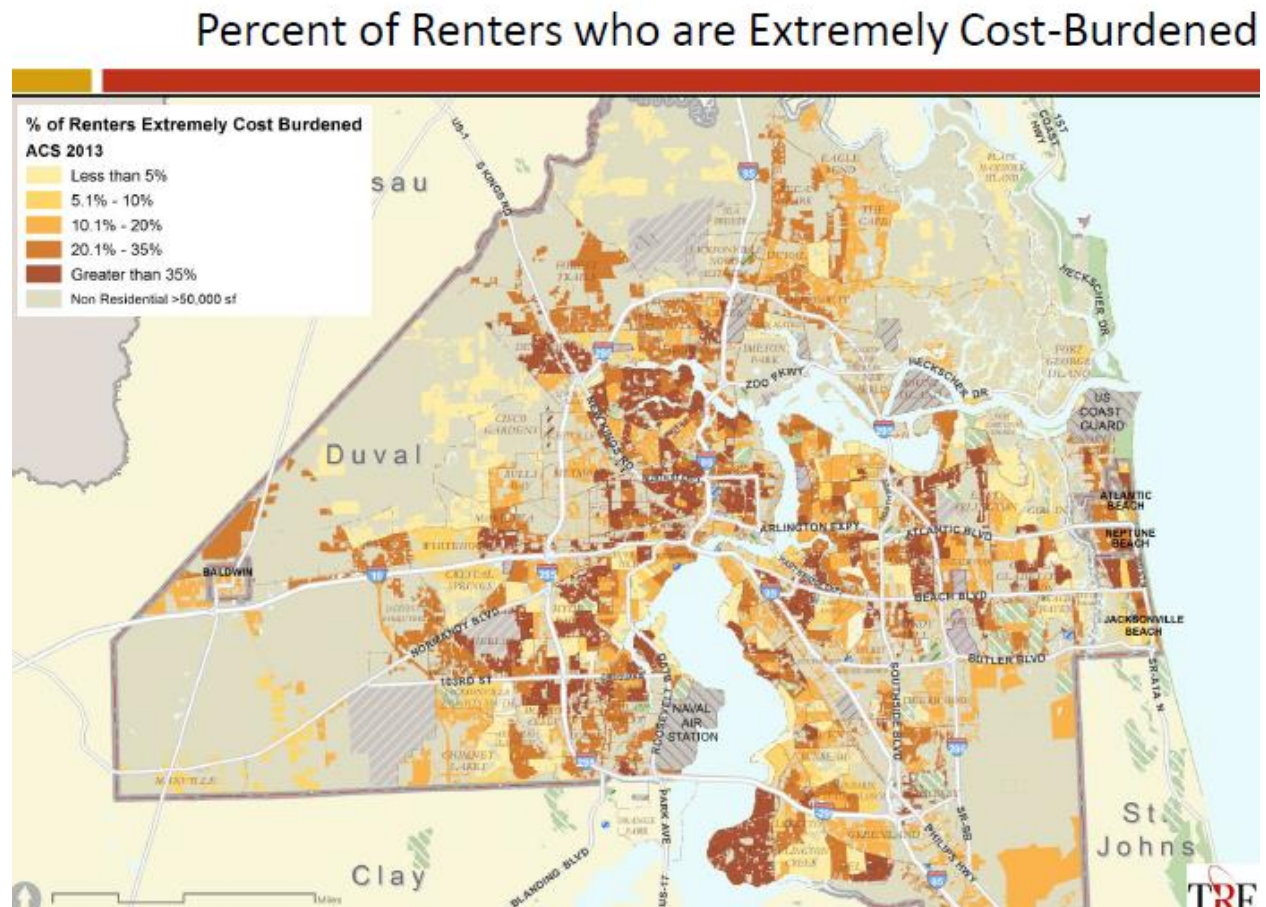


Table 15. Percent of Renters who are Extremely Cost-Burdened



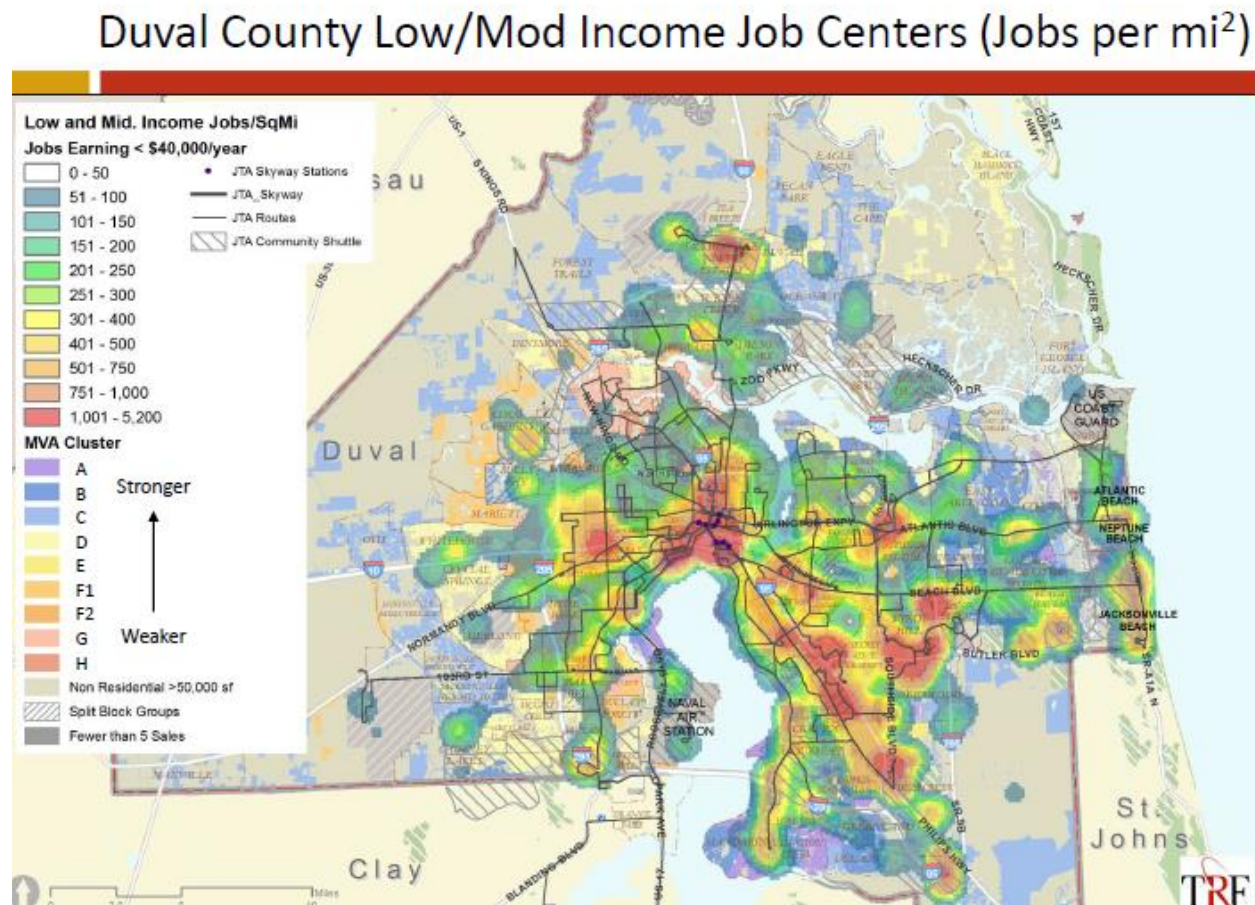
HOUSING, TRANSPORTATION AND EMPLOYMENT LINKAGES

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 as reflected in Table 16.

Table 16. Low/Mod Income Job Centers with Transportation Indicators



Section III: Housing and Land Use Policy Review

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 within the Local Housing Assistance Plan of the State Housing Incentive Partnership 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

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 as 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, 2010 and ending June 30, 2015 as part of the Fair Housing planning process.

07 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 17. Duval County Fair Housing Complaints⁶ by Fiscal Year

BASIS / BY YEAR	07/01/10 - 06/30/11	07/01/11 - 06/30/12	07/01/12 - 06/30/13	07/01/13 - 06/30/14	07/01/14 - 06/30/15
Race	12	11	3	4	1
National Origin	6	1	2	1	2
Sex		1			2
Disability	16	14	9	4	11
Familial Status	3			1	1
Race/Color				1	
Race/National Origin	1		1	2	
Race/Disability	7	1			1
Race/Familial Status	1		1		
Race/Religion	1				
Race/Sex	1	1			
Sex/Disability	1	1			
Sex/Marital Status					2
Sex/ National Origin	1				
National Origin/Disability	2	1			
National Origin/Religion	1				
Familial Status/Disability		1			
Race/Color/National Origin					3
Race/Sex/Familial Status		1			
Sex/Familial Status/National Origin	1				
Race/Color/Disability		1			
Sex/ Domestic Violence			1		
TOTAL RESOLUTIONS	54	34	17	13	23

Source: Jacksonville Human Rights Commission

08 presents information on the disposition of Fair Housing complaints. Over the five-year period, 17% of complaints were found to have no cause. Conciliation was successful for 20% of complaints, while 16% were waived to HUD for investigation and/or resolution. Withdrawal without resolution occurred in 11% of the reported complaints.

⁶ 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 18. Duval County Disposition of Fair Housing Complaints by Fiscal Year

CLOSURE TYPE/BY YEAR	07/01/10 – 06/30/11	07/01/11 – 06/30/12	07/01/12 – 06/30/13	07/01/13 – 06/30/14	07/01/14 – 06/30/15	Category Totals
No Cause Determination	25	10	10	3	6	54
Cause/Conciliation Successful		1		5		6
Cause/Judicial Dismissal	2	1		1	1	5
Conciliation Successful	10	7			6	23
Withdrawn w/ Resolution	2	5	2	1	2	12
Withdrawn w/o Resolution	9	3	2	1	1	16
Failure to Cooperate		2				2
Unable to Locate Complainant						0
Lack of Jurisdiction						0
Waived to HUD	6	5	3	2	7	23
TOTAL	54	34	17	13	23	141

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 2010 and 2014. 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 2010 data is more representative of the current state of mortgage lending in the MSA.

09 presents data on home mortgage loan approvals and denials by race and ethnicity for 2010.

Table 19. Home Mortgage Disclosure Act Loan Data by Race/Ethnicity, 2010

Race/Ethnicity	Loans Approved	Loans Denied
White alone	5,471	1,127
Black or African-American alone	1,234	504
American Indian or Native American alone	18	36
Asian alone	192	36
Native Hawaiian or Pacific Islander alone	29	5
Hispanic or Latino	466	128

Source: Federal Financial Institutions Examination Council (FFIEC), 2010

Table 20 provides Home Mortgage Disclosure Act Loan data by race and ethnicity for 2014.

Table 20. Home Mortgage Disclosure Act Loan Data by Race/Ethnicity, 2014

Race/Ethnicity	Loans Approved	Loans Denied
White alone	5,226	1,083
Black or African-American alone	1,190	439
American Indian or Native American alone	32	11
Asian alone	166	41
Native Hawaiian or Pacific Islander alone	36	10
Hispanic or Latino	517	149

Source: Federal Financial Institutions Examination Council (FFIEC), 2014

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

Another factor to consider is that the data is during a period where there was an extremely high number of mortgage interest rate resets and ignited an increase in the number of foreclosures. There is a clear fluctuation of the number of

mortgages which also indicate that a contributing factor was the loss of employment or the necessity to take on employment at a lower rate of pay.

Section V: Community Input

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. As the community rebounds from the foreclosure crisis, investor firms began to absorb the majority of the affordable housing stock causing a severe mismatch between demand and supply of housing units affordable for low-income households. Demand has also become apparent for affordable housing for ownership. This demand has ignited the positive development of infill housing and subdivisions. 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 sparsely 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. Additionally, when housing vouchers or units have become available, it is rarely marketed to those with disabilities which exasperates the search to fulfill their housing needs.

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 for the elimination of blight in the core of our low/mod communities.

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.

Section VI: Additional Fair Housing Evidence

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.⁷ Although this information may appear dated, the information is still relevant today. Knowledge continues to be limited when it relates to fair housing. 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 2001.⁸ 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.

⁷ 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.

⁸ 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.

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; however, education is critical to achieve positive outcomes.

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

ACTION PLAN TO ADDRESS FAIR HOUSING

The City of Jacksonville remains committed to ensuring "the ability of persons, regardless of race, color, religion, sex, handicap, familial status or national origin, of similar income levels to have available to them the same housing choices." As such, the City of Jacksonville wrote an Action Plan to address the impediments. The action strategies follow.

Issue 1—"There are indications that discrimination based on the basis of conditions such as race, a disability, economic status, national origin, and language barriers (LEP), is a factor in obtaining affordable rental housing in the City of Jacksonville. "

Action strategies include:

- Issues related to fair housing choice for discussion and deliberation by the Jacksonville Human Rights Commission.
- Continue to provide information (in English and in Spanish) related to fair housing laws and contact information for fair housing complaints on the government access channels.
- Collect information on fair housing issues and potential violations in conjunction with neighborhood community meetings and public hearings.
- Continue referral of housing discrimination complaints received directly to the Housing & Community Development Division (HCDD).
- Work closely with the Cities of Jacksonville Beach, Baldwin, Neptune Beach, and other small cities within Duval County to support fair housing activities that coordinate and disseminate fair housing awareness information, including programs to the public, neighborhood groups, realtors, non-profit organizations, faith-based organizations, and other related groups throughout Duval County.
- Continue promotion of the Neighborhoods Department, City of Jacksonville Housing & Community Development Fair Housing websites and the

development and distribution of additional media and materials.

- Seek partnerships with the Duval Public School system, Public & Private Colleges and Universities, libraries, financial institutions and other related organizations to educate renters, including teens and young adults, on renter rights and responsibilities as well as financial management strategies to enable them to move toward self-sufficiency.
- Seek opportunities to coordinate awareness and disseminate information about fair housing issues and awareness through community activities such as health fairs, housing meetings, and other outreach activities.
- Expand participation in fair housing awareness promotion efforts such as *Fair Housing Month* to increase awareness and support for fair housing initiatives among the general public, local officials, financial institutions and the private sector.

Issue 2—"The supply of affordable housing in City of Jacksonville/Duval County, for purchase and for rent, is inadequate to meet current and future demands. "

Action Strategies include:

- Explore additional funding mechanisms for down payment/purchase assistance program for LMI homebuyers. Develop partnerships that would increase the availability of safe, decent affordable housing to include housing rehabilitation and upgrades to accommodate the needs of disabled residents.
- Identify ways to reduce land costs for the development of affordable housing.
- Educate local developers and builders on funding assistance programs available for the development of affordable housing.
- Explore ways to assist multiple owners of inherited property in navigating and possibly expediting the process of obtaining clear titles to the property. Clear titles are required in order to obtain a mortgage for home construction, purchase a manufactured home, and to refinance.
- Work to identify and pursue potential funding sources and leverage partnerships to support affordable housing objectives to include governmental and non-traditional funding sources.
- Explore possible incentives for the private development of affordable housing units, to include fee reductions and zoning incentives.
- Support the HOME funding of designated CHDOs for eligible housing related activities.
- Support local housing authorities in the continuation of LMI programs

and projects aimed at increasing the amount and quality of affordable housing resources within the City of Jacksonville/Duval County and in their efforts to secure additional funding for housing assistance for residents.

- Support local non-profit housing organizations in their efforts to improve and expand affordable housing options in Jacksonville.
- Promote diversity (economic, geographic, and cultural) in the appointment of local boards and commissions that deal with land use regulation, permitting and enforcement.
- Support federal, state and local efforts to explore initiatives that can alleviate escalating insurance costs in coastal areas that threaten housing affordability.
- Actively support the efforts of area non-profits and service providers that work to provide supportive services for LMI residents and particularly for special populations.
- Periodically review regulations, procedures and policies to identify potential barriers for developers of affordable housing and encourage zoning, regulations, and community development proposals that promote fair and equal housing opportunities.
- Continue to integrate affordable housing concepts into the local government consolidated plan and comprehensive planning process.
- Identify and promote the use of potential tax credits at the state and federal levels to assist developers with making affordable housing an option.

Issue 3—“The lack of public transportation remains a significant barrier for low and moderate income residents and special needs populations. ”

Action strategies include:

- Support efforts to improve and expand the capacity and reliability of the public transit system in the City of Jacksonville.
- Encourage the continued efforts of JTA to keep public transportation rates affordable for LMI residents.
- Seek opportunities to participate in transit planning activities at the City, County, and regional levels to promote the jobs/housing/transportation linkage.
- Encourage support of alternative modes of travel to include well-designed systems of walkways and trails within proximity of affordable housing that provide residents with safe, inexpensive transportation alternatives to access jobs, education and services.

- Continue to integrate affordable housing concepts within the transportation, housing, economic development and community facilities elements of the Comprehensive Plans.

Issue 4- “The attainment of access to fair housing and suitable living environments for all City of Jacksonville/Duval County residents will require the planning and implementation of housing opportunities across traditional jurisdiction boundaries.”

Action strategies include:

- Provide a suitable living environment for residents by conducting, participating in, and encouraging efforts including City of Jacksonville Housing & Community Development Division consolidated plans and annual action plans, City, County, and local land use planning, regional transportation planning, planning and review of public utilities including water and sewer, public transportation planning, planning for parks and recreational facilities, and cleanup of environmental hazards.
- Continue to utilize CDBG funding and seek additional resources to improve availability and accessibility of residents to adequate public facilities, services, infrastructure and other critical community needs.
- Encourage and support efforts inter-governmentally with service providers in the provision of suitable living environments through new or improved availability and accessibility to public facilities, services, infrastructure, and other critical community needs for LMI residents.
- Promote the provision of a suitable living environment through new or improved services that promote sustainability in neighborhoods or communities by supporting efforts and initiatives aimed at balancing economic opportunities with access to housing and community facilities.
- Explore programs and funding sources for the elimination of blighted areas and conditions in LMI areas and the provision of adequate infrastructure.
- Coordinate inter-governmentally to collaboratively address the need for fair housing access and suitable living environments and facilitate cross-jurisdictional efforts.

Conclusions & Recommendations

The *Analysis of Impediments to Fair Housing* for the City of Jacksonville points to multiple and, in many cases, interrelated areas of need. These impediment issues emerged from an extensive review of current policies and practices in both the

public and private sectors, interviews with key service providers, and a detailed examination of socio- economic data. Each major need is summarized as follows, along with a brief overview of the existing conditions surrounding each issue and proposed implementation strategies to address identified resource gaps and needs. A list of sample measures that can be used to assess progress in mitigating impediments to fair housing is also included for each key issue.

Impediment 1: There **are indications that discrimination on the basis of conditions such as disability, economic status, national origin, and language barriers is a factor in obtaining affordable rental housing.**

Assessment: While there is no sound statistical or documented evidence of patterns, policies or practices that either intentionally discriminate against protected classes or exert a disparate impact on them with regard to obtaining affordable rental housing, the Fair Housing Forum and subsequent interviews with service providers revealed anecdotal information related to perceived discrimination based on factors such as disability, economic status, national origin, and language barriers. However, without the investigation and resolution of recorded complaints via the Jacksonville Human Rights Commission or the HUD Office of Fair Housing, it is very difficult to document the extent of this problem.

Strategies:

- Continue to provide information related to fair housing laws and contact information for fair housing complaints on the government channels and websites.
- Continue to collect information on fair housing issues and potential violations in conjunction with neighborhood and community meetings and public hearings.
- Continue referral of housing discrimination complaints received directly to the HCDD Office, and referrals from partner organizations related to fair housing issues in cooperation with the Jacksonville Human Rights Commission.
- Work closely inter-governmentally and with partner agencies to coordinate and disseminate fair housing awareness information and programs to the public, neighborhood groups, faith-based organizations, programs serving disabled residents and other related groups throughout the County through continued promotion of the City of Jacksonville Housing & Community Development websites, distribution of fair housing materials, promotion of Fair Housing Month, and the development and distribution of additional media and materials.

- Work inter-governmentally to discourage exclusionary regulations and policies.
- Seek external partnerships with the Duval Public School system, Public & Private Colleges and Universities, financial institutions and other related organizations to educate renters, including teens and young adults, on renter rights and responsibilities as well as financial literacy and management strategies to enable them to move toward self-sufficiency.
- Work to coordinate and disseminate fair housing awareness information and programs in conjunction with Jacksonville Area Legal Aid, financial institutions, and the real estate and construction industry.
- Seek opportunities to facilitate collaboration and expand participation on fair housing issues through quarterly meetings the Jacksonville Human Rights Commission, participation in Affordable Housing Symposiums and Forums, presentations to community groups, and outreach to the real estate industry, and housing developers.

Measures:

- Fair Housing complaints referred to Jacksonville Human Rights Commission.
- Translation and distribution of fair housing materials in multiple languages.
- Presentations made to community groups, neighborhood groups, faith-based organizations, organizations serving disabled residents, and other related groups.
- Presentations and meetings inter-governmentally, community groups, real estate professionals and housing developers.
- Promotion of Fair Housing Month.

***Impediment 2:* The supply of affordable housing in the City of Jacksonville/Duval County – both for purchase and for rent – is inadequate to meet current and future demand.**

Assessment: Provision of fair housing and the availability of affordable housing are closely linked. While not strictly a fair housing issue, the impact of affordability on housing choice cannot be overlooked. Although housing construction rose significantly in the past decade, most new rental housing units are not affordable to residents with low and moderate incomes. In addition, many of the housing units that are affordable are unsafe and/or substandard and in critical need of repair. There is also a pressing need for safe, decent and affordable housing that can accommodate the needs of disabled residents. The shortage of affordable housing is

most acutely evidenced in the long waiting lists for Section 8 housing vouchers for City/County residents. During difficult economic times, many residents find themselves without the means to afford decent housing and are increasingly at risk for homelessness.

Strategies:

- Explore mechanisms and funding sources to support the development of affordable rental housing units.
- Explore partnerships, funding and programs that would increase the availability of safe, decent affordable housing to include housing rehabilitation and upgrades to accommodate the needs of disabled and aging residents.
- Explore ways to reduce land costs for the development of affordable housing.
- Educate local developers and builders on funding assistance programs available for the development of affordable housing.
- In partnership with other community partners and private entities, work to identify and pursue potential funding sources and leverage partnerships to support affordable housing objectives to include governmental and non-traditional funding sources.
- Support the HOME funding of designated Community Housing Development Organizations (CHDOs) for eligible housing related activities.
- Support local housing authorities in the continuation of LMI programs and projects aimed at increasing the amount and quality of affordable housing resources within Duval County.
- Support local housing authorities in their efforts to secure additional funding for housing assistance for residents.
- Support local non-profit housing organizations in their efforts to improve and expand affordable housing options in the City of Jacksonville and Duval County.
- Actively support the efforts of area non-profits and service providers that work to provide supportive services for LMI residents and particularly for special populations.
- Periodically review regulations, procedures and policies to identify potential barriers for developers of affordable housing and encourage zoning, regulations, and community development proposals that promote fair and equal housing opportunities.
- Continue to actively support the efforts of other area organizations that plan for and provide housing and supportive services for the homeless and those at risk of homelessness.

- Continue to integrate affordable housing concepts into the local government comprehensive planning process.

Measures:

- Number of residents on Section 8 waiting list
- Number of residents receiving Section 8 vouchers
- Rehabilitation and/or construction of affordable rental housing units
- Number of housing units upgraded and/or repaired
- Promotional materials, proclamations, events, and other materials
- Media coverage
- Zoning and land use regulations revisions and updates
- Comprehensive Plan updates
- Service and housing provider interviews and feedback
- Median home prices
- Median rents
- Median age of housing stock
- HMIS data

Impediment 3: The lack of public transportation remains a significant barrier for low and moderate income residents and special needs populations.

Assessment: The lower incomes of many area residents – exacerbated by physical and geographic access limitations of vulnerable populations such as the elderly, single-parent households, immigrants without driver’s licenses, rural residents, and residents with disabilities – make the availability of affordable and reliable transit a necessity to maintain employment, receive support services, and access vital health care and other support programs. The Jacksonville Transportation Authority (JTA) provides service on regularly scheduled routes serving the communities of Duval County. Many residents living in more affordable housing found in rural areas limited to no access to public transportation without an physically or economic strain. Access to public transportation is particularly critical for disabled and elderly residents, who rely heavily on public transportation for essential access to health care, employment and shopping. The location of housing supply within the context of overall accessibility to these critical services and resources can either create or reduce barriers to affordable housing and housing choice.

Strategies:

- Support efforts to improve and expand the capacity and reliability of the public transit system in the City of Jacksonville/Duval County.

- Encourage the continued efforts of JTA to keep public transportation rates affordable for LMI residents.
- Seek opportunities to participate in transit planning activities at the County and regional levels to promote the jobs/housing/transportation linkage.
- Encourage support of alternative modes of travel to include well-designed systems of walkways and trails within proximity of affordable housing that provide residents with safe, inexpensive transportation alternatives to access jobs, education and services.
- Continue to integrate affordable housing concepts within the transportation, housing, economic development and community facilities elements of the Comprehensive Plans.

Measures:

- Expanded public transit routes and scheduling
- Increased transit ridership
- Regional transportation plans and projects
- Comprehensive Plan updates and revisions
- Zoning Ordinance updates and revisions
- Alternative transit infrastructure investment in walkways, greenways and bikeways
- Route planning and mapping
- Interviews and feedback from service providers

***Impediment 4:* The attainment of access to fair housing and suitable living environments for all City of Jacksonville/Duval County residents will require the planning and implementation of housing opportunities across traditional jurisdiction boundaries.**

Assessment: A clean, safe and suitable living environment is a basic human need. Included in this environment are factors such as access to clean drinking water, sewer service, safe roads, fire protection and public safety services, elimination of unsafe structures harboring unwanted and sometimes dangerous activities, removal of trash and debris on vacant properties, and access to other basic services that contribute to quality of life. The rehabilitation or elimination of blighted conditions, the provision of essential community services and infrastructure, and the creation of economic opportunity are important factors in improving the lives of LMI residents and expanding housing opportunities.

Strategies:

- In conjunction with the Blight Committee, community stakeholders and non-profits, provide a suitable living environment for residents by conducting, participating in or encouraging efforts including: City of Jacksonville Housing & Community Development consolidated plans and annual action plans, local land use planning, regional transportation planning, planning and review of public utilities including water and sewer, public transportation planning, planning for parks and recreational facilities, and cleanup of environmental hazards.
- Continue to utilize CDBG funding and seek additional resources and partnerships to improve availability and accessibility of City/County residents to adequate public facilities, services, infrastructure and other critical community needs.
- Encourage and support efforts inter-governmentally through service providers in the provision of suitable living environments through new or improved availability and accessibility to public facilities, services, infrastructure, and other critical community needs for LMI residents.
- Promote the provision of a suitable living environment through new or improved services that promote sustainability in neighborhoods or communities by supporting efforts and initiatives aimed at balancing economic opportunities with access to housing and community facilities.
- Explore programs and funding sources for the elimination of blighted areas and conditions in LMI areas and the provision of adequate infrastructure.

Measures:

- Elimination of blighted conditions in LMI areas
- Improved access to public facilities and community services for LMI residents
- New or expanded infrastructure available to LMI areas
- Improved health and safety of residents in LMI areas
- Increased job opportunity for LMI residents

***Impediment 5:* Local realtors have identified the need for more fair housing information and for the information to be available in other languages for persons with limited English proficiency (LEP).**

Assessment: A lack of fair housing marketing campaigns in recent years has led to a lack of general knowledge of basic fair housing standards amongst housing professionals within the community. LEP communities are particularly affected by this as they are often some of the most vulnerable populations.

Strategies:

- Obtain funding to provide for a Fair Housing marketing campaign.
- Work with local realtors and other housing providers, including CHDOs & CDCs, to carry out more in-depth and comprehensive fair housing education.
- Conduct regularly scheduled workshops for local realtors, lenders, property managers and other housing industry professionals.
- Conduct a Fair Housing marketing campaign specifically targeted at LEP populations, including flyers, ads and other marketing materials in multiple languages and distributed in LEP communities.
- Ensure a LEP population educational component is included in fair housing workshops and trainings conducted for area housing professionals.

Measures:

- More knowledgeable housing industry professionals
- Decreased number of fair housing complaints
- Increase in number of LEP citizens educated on fair housing

CONCLUSION

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

