

Analysis of Impediments to Fair Housing Choice in the City of Jacksonville



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SECTION I: INTRODUCTION AND SUMMARY OF METHODOLOGY

A. Purpose

This document, the *Analysis of Impediments to Fair Housing Choice in Jacksonville* was prepared by the City of Jacksonville as part of the compliance requirements from the U.S. Department of Housing and Urban Development (HUD). HUD requires that the City conduct an analysis of impediments to fair housing choice periodically.

The City of Jacksonville is taking certain actions to affirmatively further fair housing (AFFH). The purpose of these actions is to eliminate discrimination and segregation in housing on the basis of race, color, religion, sex, age, disability, familial status or national origin, and to expand housing choices for all residents of the City of Jacksonville. As part of the effort to attain this goal, HUD requires jurisdictions to engage in fair housing planning. This process requires:

- 1) *the development of an Analysis of the Impediments to Fair Housing Choice;*
- 2) *the development of activities to overcome the effects of the identified impediments;*
and
- 3) *the development of a system of record-keeping to monitor and record the activities undertaken to reduce or overcome the identified impediments to fair housing choice.*

B. Definition of Terms

The US Department of Housing and Urban Development utilizes the following definitions:

Fair Housing:

The Fair Housing Act, 42 U.S.C. 3601 et seq., prohibits discrimination by direct providers of housing, such as landlords and real estate companies as well as other entities, such as municipalities, banks or other lending institutions and homeowners insurance companies whose discriminatory practices make housing unavailable to persons because of race or color, religion, gender, national origin, familial status, or disability.

For persons with disabilities, fair housing law makes it illegal to:

- fail to make reasonable accommodation in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit and
- fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

Impediments to Fair Housing Choice:

- Any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin which restrict housing choices or the availability of housing choices; or
- any actions, omissions or decisions that have the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

C. Methodology

The City of Jacksonville selected Ken Weeden & Associates, Inc. Planning Consultants (KWA) to assist with this Analysis of Impediments to Fair Housing Choice (AI). The last AI was completed in 2007; this AI will update and replace that document. This study involves data collection and analysis from a variety of sources and analysis of that data, as described below.

- 1) *Review of City of Jacksonville's previous AI, completed in 2007.*
- 2) *Review of locally-generated reports and other relevant data pertaining to the local housing market, patterns, and local economy*
- 3) *Assessment of housing discrimination complaints;*
- 4) *Examination of mortgage lending trends through the analysis of data available through the Home Mortgage Disclosure Act (HMDA),*
- 5) *Consultation with housing practitioners (service providers, advocates, local government officials) about actual and potential impediments to fair housing,*
- 6) *Survey of real estate and mortgage professionals regarding the housing market and local real estate market practices*

7) *Survey of local citizens to determine general perceptions regarding housing and the status fair housing rights in the City and County.*

SECTION II: SUMMARY OF FINDINGS & RECOMMENDED ACTIONS

The current analysis identified the following possible impediments to Fair Housing Choice in the City of Jacksonville:

- A. Lack of affordable housing for low income and disabled residents**
- B. Lack of public transportation options**
- C. Lack of fair housing education**

SECTION III: DEMOGRAPHIC INFORMATION

A. Location

Jacksonville is located in and is the county seat of Onslow County, North Carolina. According to the United States Census Bureau, in 2000 the city had a total area of 44 square miles. Jacksonville is located in the Coastal region of North Carolina, approximately 120 miles east of Raleigh, and 60 miles north of Wilmington, North Carolina. Jacksonville is the home of the United States Marine Corps' Marine Corps Base Camp Lejeune and Marine Corps Air Station New River. The military is a significant factor in all of Jacksonville's demographic information and is discussed further in the next section.

B. Camp Lejeune

Marine Corps Base Camp Lejeune is a 246-square-mile United States military training facility in Onslow County. The main base is supplemented by five satellite facilities: Marine Corps Air Station New River, Camp Geiger, Stone Bay, Courthouse Bay, Camp Johnson, and the latest addition to the facility, the Greater Sandy Run Training Area.

Camp Lejeune and the New River Air Station remain the largest single employers in the area and more than 70% of their personnel live off-base. Military connected payrolls and benefits paid exceed an estimated \$8.3 billion annually. During the last four years,

Camp Lejeune officials saw the creation of three new battalions headquartered on the base. Coast Guard officials have announced plans to expand a new training facility at Camp Lejeune. Several types of Coast Guard port security training only takes place at Camp Lejeune as a result of the efforts by Homeland Security to bolster their efforts.

By 2012, the Marine Corps will have troop strength of 202,000 with most of the increase in manpower being assigned to Camp Lejeune. Military construction is strong with new projects being announced regularly. Construction jobs in the Jacksonville area ranks fifth in the list of occupational areas as a result of the large number of persons employed to meet military and other construction needs in the community.¹

Table 1 below describes the number of people in Jacksonville associated with the military.

Table 1: Local Military Impact

Type	# of Persons
Marine Corps Base Private Housing	8,775
Family Member Living Off-Base	33,641
Family Members of Active Duty Personnel	42,416
Retired Federal in Marine Corps Base Area	9,599
Retired Family Members in MCB Area	35,412
Total Retiree Population	45,011
Civilian Service Employees	3,213
Civilian Employees (NAFI)	2,078
Total Civilians Employed on MCB	5,291
Total Active Duty	47,153
Total Military Presence	139,871

Source: Onslow County Planning & Development Department

Advisory Commission on Military Affairs (ACMA) was created by the General Assembly in 2001 to advise both the Governor and the Secretary of Commerce on issues related to the military presence in North Carolina. The ACMA recently released a report describing the economic impact of the military in North Carolina. The study, entitled

¹ (City of Jacksonville 2010)

North Carolina's Military Footprint: Current Economic Impacts and Projections for 2013, indicates that:

- In 2007, military activities contributed \$23.4 billion, or 7 percent of North Carolina's State Gross Domestic Product (value of total final goods and services produced).
- Military base payroll accounts for \$19.2 billion of the estimated impact on State GDP.
- More than 416,000 individuals, or 8 percent of total state employment, are either directly employed by the military or Coast Guard, or have jobs that are supported by military installations in North Carolina

Additionally, the study indicates that by 2013, North Carolina's military bases will have undergone a substantial transformation due to the Base Closure and Realignment (BRAC) activity and other planned troop increases. In the eastern part of the state, the Marine Corps plans to add an additional 11,477 Marines, Navy, and civilian workers at Camp Lejeune and associated air stations by 2012. The Marine Corps also anticipates an increase in the number of private contractors at their installations but has not yet formulated an exact estimate.

The military growth scheduled to take place between 2006 and 2013 translates into a more than \$1.93 billion increase in real disposable personal income. By 2013, the annual real disposable per capita income will increase in the Eastern Region (where Seymour Johnson AFB, Camp Lejeune, New River, and Cherry Point are located) by \$183 billion. The more disposable income an individual or family has, the more goods and services can be purchased. In 2007, the residents of North Carolina had \$16.8 billion more Real Disposable Personal Income due to the presence of the military.

C. Population

In 2000, the US Census Bureau (Census) indicates that Jacksonville's population was 66,715; in 2008 the Census estimated that the population was 76,233. (The North Carolina State Data Center puts the July 2008 population at 81,873.) In 2008,

Jacksonville was North Carolina’s 10th most populous city, according to the Office of State Budget and Management.

Note: The most recent data available from the U.S. Census Bureau regarding demographic information comes from the American Community Survey (ACS). The ACS collects and produces population and housing information every year instead of every ten years. Data are based on a sample and are subject to sampling variability. In 2008, the Census Bureau released its first 3-year estimates based on ACS data collected from 2005 through 2007. These 3-year estimates are available annually for geographic areas with a population of 20,000 or more. This data set includes the City of Jacksonville and has a 90% confidence level. Information presented in the demographic section of this document is from the 2006-2008 ACS unless otherwise indicated.

Table 2: Population Growth in Jacksonville

	2008	2000	1990
Population	76,233	66,715	30,013

Source: U.S. Census Bureau, 2008 Population Estimates, Census 2000, 1990 Census

D. Racial/ Ethnic Background

Based on the 2006-2008 American Community Survey estimates, of people reporting one race alone in the City of Jacksonville, 64% were White; 23% were Black or African American; the chart below describes the remaining racial distribution. (Note that 6% of respondents indicated that they were a member of a race which was not listed.)

One percent (1%) reported being a member of “two or more races”. More than 90% of City residents indicated that they are non-Hispanic (of any race). Nine percent (9%) of residents indicated that they are Hispanic or Latino; people of Hispanic origin may be of any race.

Table 3: Race in Jacksonville (2008)

	Jacksonville	% of Total Population
White alone	44,343	64.4%
Black or African American alone	15,521	22.5%
American Indian and Alaska Native alone	713	1.0%
Asian alone	1,810	2.6%
Native Hawaiian and Other Pacific Islander alone	180	0.3%
Some other race alone	3,819	5.5%
Two or more races	2,494	3.6%
<i>Hispanic or Latino Origin</i>		
Not Hispanic	62,466	90.7%
Hispanic or Latino	6,414	9.3%
Total	68,880	100%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Areas of Minority Concentration

All of the tract and block statistical data presented below is from Census 2000 unless otherwise noted.

Table 4: Areas of Minority Concentration by Income Level and Census Tract

Tract Code	Tract Income Level	Tract Minority %	% Below Poverty Line
5	Upper	25.99	0
6	Upper	32.15	0
7	Middle	35.74	6.22
8	Moderate	37.23	16.81
9	Moderate	44.2	17.69
10	Middle	33.2	3.75
11	Middle	31.77	10.68
12	Middle	35.34	7.84
13	Middle	36.68	9.64
14	Upper	13.97	5.26
15	Moderate	46.76	22.22
17	Middle	30.5	12.32
18	Middle	32.39	19.76
19	Moderate	74.43	28.31
20	Low	86.14	43.35
21	Upper	36.65	5.52
22	Middle	43.22	14.67

Source: Federal Financial Institutions Examination Council; <http://www.ffiec.gov>

% of MSA Median Family Income	Income Level	Median Family Income Jacksonville, 2000 Census
< 50%	Low	\$33,763
Between 50% > 80%	Moderate	
Between 80% > 120%	Middle	
>120%	Upper	

There are seventeen (17) census tracts within the city limits of Jacksonville; there are twenty-six (26) census tracts in the Jacksonville Metropolitan Statistical Area according to the Census. (Note that the Census Bureau provides Census tract information and housing data, including mortgage rates is often provided based on tracts.) Map A in the Appendix describes the areas of minority concentration within the City.

E. Households, Families & Individuals

The tables below describe the demographics of the City of Jacksonville.

Table 5: Household & Family Demographic, 2008

	Estimate	Percent
Total households	18,751	100.0%
Family households (families)	13,333	71.1%
With own children under 18 years	8,098	43.2%
Married-couple family	9,714	51.8%
With own children under 18 years	5,409	28.8%
Male householder, no wife present, family	236	1.3%
With own children under 18 years	52	0.3%
Female householder, no husband present, family	3,383	18.0%
With own children under 18 years	2,637	14.1%
Nonfamily households	5,418	28.9%
Householder living alone	4,436	23.7%
65 years and over	1,199	6.4%
Households with one or more people under 18 years	8,881	47.4%
Households with one or more people 65 years and over	2,796	14.9%
Average household size	2.45	
Average family size	2.9	

Source: U.S. Census Bureau, 2006-2008 American Community Survey

The median age in Jacksonville is 22.2 years. Almost 62% of the City is male. **Table 6** describes the demographics in more detail.

Table 6: Age & Gender Jacksonville, 2008

Age Group	% of Total Population
5 to 14 years	11.3%
15 to 17 years	2.6%
18 to 24 years	38.0%
15 to 44 years	63.4%
16 years and over	78.1%
18 years and over	76.5%
60 years and over	6.9%
62 years and over	6.1%
65 years and over	4.7%
75 years and over	2.2%
Median age (years)	22.2
Male	61.8%
Female	38.2%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

F. Disabled Population

Table 7 below describes the characteristics of disabled individuals in the City of Jacksonville.

Table 7: Disability Characteristics, 2008

	Estimate	Percent
Total Civilian Noninstitutionalized Population	40,468	100.0%
With a disability	4,182	10.3%
Under 18 years with a disability	836	5.6%
18 to 64 years with a disability	1,919	8.6%
65 years and over with a disability	1,427	44.7%

Source: U.S. Census Bureau, 2008 American Community Survey, 1-Year Estimates

According to the Consolidated Plan, there is a need for people with special needs to have supportive services available regardless of whether they rent or own. Neither rental housing applicants, nor home loan applicants are required to disclose disabilities. (Though in the case of rental housing, an applicant might have to disclose a disability in order to request handicapped accessible housing.)

G. Income & Poverty

The median income of households in the City of Jacksonville was \$42,255; the median family income was \$48,018 based on the 2006-2008 Census estimates.

Poverty

In Jacksonville, 11.2% of all families and 2.8% of married families (i.e. couples) live below the poverty level. The percentage of families living below the poverty level with children under the age of eighteen is significantly higher than that of families without children. Approximately 17% of all families with children live below the poverty level. The percentage more than doubles when there is a female head of household, with no husband present (i.e. single mother).

Table 8: Poverty Status of Individuals

	Percent below poverty level		
	All Families	Married-couple families	Female householder, no husband present
All Families	11.2%	2.8%	40.8%
With related children under 18 years	16.9%	3.8%	46.4%
White	7.8%	3.5%	30.6%
Black or African American	18.2%	0.8%	47.4%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

H. Housing Profile

Housing Tenure

The 2000 Census provides specific information regarding the types of units available in the City, including information on vacant units. This data is illustrated in **Table 9** below.

Table 9: City of Jacksonville Total Housing Units

Housing Types	# of Units	% of Units
Owner-occupied housing units	6,733	39.2%
Renter-occupied housing units	10,442	60.8%
Occupied housing units	17,175	93.8%
<hr/>		
Renter-occupied housing units	10,442	60.8
<hr/>		
For rent	575	50.6%
For sale only	202	17.8%
Rented or sold, not occupied	27	2.4%
For seasonal, recreational, or occasional use	37	3.3%
Other vacant	296	26.0%
Vacant housing units	1,137	6.2%
<hr/>		
TOTAL HOUSING UNITS	18,312	100.0%

Source: 2000 Census, U.S. Bureau

The table shows that the city has a vacancy rate of 6.2%. Most (60.8%) of the housing available in the city is owner-occupied; just under 40% of housing units are renter-occupied.

Table 10: Age of Housing Stock in the City of Jacksonville

Tract Code	Tract Income Level	Median House Age (Years)	Median Gross Rent
5	Upper	48	\$ 575
6	Upper	48	\$ 650
7	Middle	41	\$ 628
8	Moderate	46	\$ 434
9	Moderate	42	\$ 460
10	Middle	36	\$ 620
11	Middle	21	\$ 473
12	Middle	19	\$ 616
13	Middle	19	\$ 573
14	Upper	33	\$ 763
15	Moderate	29	\$ 498
17	Middle	36	\$ 527
18	Middle	50	\$ 520
19	Moderate	40	\$ 422
20	Low	28	\$ 358
21	Upper	20	\$ 576
22	Middle	17	\$ 588

Source: Federal Financial Institutions Examination Council; www.ffiec.gov, 1/5/10

Table 11: Income & Housing Availability by Tenure, 2000 Census

	Owner Occupied Units	Renter Occupied Units	Vacant Units
Low	40.0%	51.5%	8.5%
Moderate	17.2%	76.4%	6.4%
Middle	44.6%	47.9%	7.4%
Upper	71.1%	24.1%	4.8%

Source: Federal Financial Institutions Examination Council; www.ffiec.gov, 1/5/10

As **Table 11** illustrates, 51.5% of the housing available in low income areas is rental housing. (Thirty percent is owner-occupied, and the rest are vacant units.) Due to the small amount of owner-occupied housing units in low income areas, there may be little opportunity for home-buying for the residents of these communities. By comparison, there are significantly more owner-occupied housing units in middle and upper income areas, which may provide more opportunity for home buying to these residents.

Cost of Housing/ Housing Affordability

The generally accepted definition of affordability is for a household to pay no more than 30 percent of its annual income on housing. Families who pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care.² The National Low Income Housing Coalition develops an annual report called “*Out of Reach*” which describes the cost of housing in various areas throughout the country and how much the typical family must earn to afford housing. The results of the 2009 study are described below.

HUD describes fair market rent (FMR) for an area as the amount that would be needed to pay the gross rent (shelter rent plus utilities) of privately owned, decent, and safe rental housing of a modest (non-luxury) nature with suitable amenities. HUD describes the FMR for a two bedroom apartment in North Carolina as \$693. The FMR for the same apartment in the Jacksonville MSA is \$618. The chart below describes the status of housing affordability per the *Out of Reach* report.

Table 12: Housing Costs and Affordability, 2009

	NC	Jacksonville MSA
Estimated mean renter wage	\$12.62	\$9.52
One bedroom Fair Market Rent	\$606	\$550
Two bedroom Fair Market Rent	\$693	\$618
Monthly Annual Median Income	\$4,796	\$4,008
Estimated renter median income	\$32,082	\$35,437
Rent affordable at renter median income	\$802	\$886
Rent affordable at median income	\$1,439	\$1,203
Rent affordable with full-time job paying min wage	\$341	\$341
Rent affordable with full-time job paying mean renter wage	\$656	\$495
Housing Wage for 1 bdrm Fair Market Rent	\$11.65	\$10.58
Housing Wage for 2 bdrm Fair Market Rent	\$13.33	\$11.88
Work hours per week at min. wage needed to afford 1 bdrm FMR	71	65
Work hours per week at min. wage needed to afford 2 bdrm FMR	81	73
Work hours per week at mean renter wage needed to afford 1 bdrm FMR	37	44
Work hours per week at mean renter wage needed to afford 2 bdrm FMR	42	50
Estimated percent of renters unable to afford 2 bdrm FMR	43%	34%

Source: National Low Income Housing Coalition

The *Out of Reach* data indicates the following:

² (US Department of Housing and Urban Development; www.hud.gov/offices/cpd/affordablehousing)

- A renter household in the Jacksonville area needs to earn \$11.88 per hour to afford a two-bedroom apartment; the mean renter wage for Jacksonville is \$9.52.
- 34% of renters in the Jacksonville MSA area cannot afford fair market rent.

SECTION IV: EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS

The complaint process, as described in the 2008 Annual Fair Housing Report (U.S. Dept. of Housing and Urban Development 2008), is as follows:

Anyone who believes he or she has experienced housing discrimination or that a discriminatory housing practice is about to occur may file a complaint or may have a complaint filed on his or her behalf by someone else, such as a parent, child, spouse, or guardian. HUD accepts complaints in person, by telephone, through the mail, or via the Internet. Once a complaint is filed, HUD determines if it meets minimal jurisdictional standards....If the complaint is jurisdictional, the person who filed the complaint signs the complaint, and HUD sends a copy of the complaint to the respondent (the person or entity against whom the complaint is made).

At no cost to the complainant, HUD begins an investigation to determine if there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur... From the time of the filing of a complaint, HUD works with all parties to resolve the case through conciliation, as required by the Fair Housing Act. HUD will attempt conciliation until a complaint is dismissed or a charge of discrimination is issued...Any agreement must be signed by the parties and HUD... Throughout the conciliation process, HUD continues to investigate the complaint. If HUD is unable to conciliate the complaint, it determines whether there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur. If HUD finds no reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, the complaint is dismissed. In that case, the complainant retains the right to pursue the matter through private litigation.

If HUD finds reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, it issues a charge of discrimination. The parties then may choose to pursue the matter before a HUD administrative law judge (ALJ) or in a U.S. district court.³

³ (U.S. Dept. of Housing and Urban Development, 2008)

KWA requested information from US Department of Housing and Urban Development (HUD) through the Freedom of Information Act regarding any actions that may have been taken in City of Jacksonville. KWA requested that HUD provide information regarding complaints filed from January 1, 2006 through September 1, 2009:

- the basis of any complaints,
- the status of those complaints,
- the demographics of the complainants, and
- what determination was made, if any.

**Chart 1: Housing Discrimination Cases Received in the City of Jacksonville
(1/1/06 - 11/20/09)**

Issue Description	Basis	Status
<ul style="list-style-type: none"> • Discriminatory advertising statements and notices • Discriminatory financing (includes real estate transactions) • Discriminatory terms, conditions, privileges, or services and facilities 	<ul style="list-style-type: none"> • National origin, other origin (Puerto Rican, Disability) • National origin, other origin (Puerto Rican, Disability) • National origin, other origin (Puerto Rican, Disability) 	<ul style="list-style-type: none"> • Closed due to lack of cooperation by complainant
<ul style="list-style-type: none"> • Discrimination in services and facilities relating rental 	<ul style="list-style-type: none"> • Race 	<ul style="list-style-type: none"> • Open/ Pending
<ul style="list-style-type: none"> • Discrimination in terms/ conditions/ privileges relating to rental 	<ul style="list-style-type: none"> • Race, Gender 	<ul style="list-style-type: none"> • Closed - No cause determination

There could be many causes for the relatively low number of complaints compared to the population of the City. One explanation is that discrimination in housing is a rare occurrence in the City of Jacksonville. Another explanation is that many residents are not aware of their fair housing rights, and therefore do not complain. Finally, residents may not know with whom to file complaints within the City. Fair housing studies and surveys throughout the country indicate that a lack of education in fair housing rights, a lack of knowledge about how to complain and fear of retribution are all reasons that residents do not notify authorities when they believe they have been discriminated against.

SECTION V: IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE – PUBLIC SECTOR

The policies, procedures, and practices of City departments, that is, the codes that govern those departments and the decisions of city boards and councils, impact fair housing goals – sometimes directly, but often indirectly. This section of the fair housing impediment analysis assesses how the City of Jacksonville Ordinances may interfere with the furtherance of federal, state or local fair housing legislation.

A fair housing violation does not require a discriminatory intent: A violation can be found even if only a discriminatory impact or burden results. KWA examined local ordinances and regulations to identify potential barriers to fair housing.

A. Fair Housing Ordinance

The City of Jacksonville does not have a Fair Housing Ordinance and relies instead on State and Federal laws governing fair housing and housing discrimination. North Carolina's Fair Housing Act (1983, c. 522, s. 1) is enforced by the North Carolina Human Relations Commission and makes it illegal to discriminate in housing because of race, color, religion, sex, national origin, physical or mental handicaps, or family status. HUD has a field office located in Greensboro, North Carolina. The Community Development department is responsible for fair housing enforcement within the City. They have designated a compliance officer who maintains records and provides information on fair housing within the City. The lack of City ordinance governing fair housing is not, in itself, an impediment to fair housing, since the City and is subject to state and Federal regulations. However, if citizens of the City is not *aware* of their rights under state and Federal laws and are unsure of where to file complaints, it is possible that fair housing violations will go unreported. **Therefore, the lack of an ordinance and subsequent enforcement agency *could* present an impediment to fair housing.**

B. Zoning Ordinances

Zoning is a means of insuring that land uses of a community are “compatible,” i.e. properly situated in relation to one another. Land uses, e.g. residential, commercial,

industrial, etc. are separated into use districts or “zones” and are further regulated by density controls. The density controls are usually implemented by imposing “minimum” building lot sizes.

The Fair Housing Act prohibits jurisdictions from making zoning or land use decisions implementing land use policies that exclude or otherwise discriminate against protected persons. The Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of non-disabled persons, to take action against or deny a permit for a home because of the disability of individuals who live or would live there, and to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations maybe necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing. **Based on a review of the City’s Zoning Ordinance and Zoning Maps, it does not appear that the Zoning ordinance directly impedes fair housing within the City.**

C. Municipal Services

The City of Jacksonville provides “traditional’ municipal services, e.g., water, sewer, trash collection, etc. Both the City and County provide planning, law enforcement, fire protection and recreation. **Based on a review of the service areas of municipal services, there do not appear to be any identifiable inequities in the provision of City services that impede Fair Housing choice.**

D. Transportation

Public transit information is important to the analysis of impediments to fair housing, as access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should link lower income persons, who are often transit dependent, to employment centers. The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. Jacksonville Transit, a department of the City, provides

public transportation for the area. Jacksonville Transit provides the following *regular schedule*:

- Monday- Friday: 6:00 a.m. - 6:00 p.m.
- Saturdays, Sundays & holidays: 10:00 a.m. - 6:00 p.m.

The transit map located in the appendix indicates the location of bus stops within the City limits. Though the bus routes provide transportations to many of the major public service agencies, shopping areas and job centers, there appear to be many areas throughout the city which are not serviced by public transportation. Additionally, there appears to be a lack of service during the evening hours which could hinder access to both housing and employment opportunities.

Onslow United Transit System, Inc. (OUTS) is a private non-profit agency that coordinates human services agencies and general public transportation. OUTS provides transportation for medical appointments, employment transportation and general purpose transportation service to low-income, disabled and elderly citizens who depend on public transit. OUTS operates Monday through Friday from 5:00am to 9:00pm by appointment. Through an annual allocation of Community Development Block Grant funds, the City subsidizes transportation costs for low and moderate income persons. Though OUTS provides a valuable service to citizens, there is no weekend service and service location is subject to availability. There is a definite shortage in public transportation options in the City of Jacksonville. **This lack of public transportation service is a barrier to housing in those areas.**

E. Public Housing

The City of Jacksonville does not have a “local” public housing authority. The Eastern Carolina Regional Housing Authority is a Public Housing Authority based in Goldsboro. The Housing Authority operations 739 units with 21 units located in Jacksonville. All of the units are classified as “low rent.”⁴ Interviews with local housing practitioners indicate that there is a specific need for low income housing within the City. Further, the Consolidated Plan indicates that there is a specific need for housing for elderly and

⁴ (City of Jacksonville 2009)

those that earn less than 30% of area median income. **There is an identified need for affordable housing within the City of Jacksonville. Though the lack of housing is not necessarily a fair housing impediment, in the case of Jacksonville, an insufficient supply of affordable housing may disproportionately affect low-income citizens and the elderly and may constitute a barrier to fair housing.**

F. Assessment of Current Fair Housing Programs and Activities

Fair Housing Enforcement & Informational Programs

As previously mentioned, the Community Development Division is responsible for fair housing compliance. Further there is a Fair Housing Complaint Officer who is charged with assisting landlords and citizens with fair housing complaints. **The City conducts fair housing hearings and works to resolve issues at the local level. If a complaint is determined to be valid and resolution is not achieved, complainants are encouraged to file a formal complaint with the NC Human Relations Commission.**

The City has basic information regarding fair housing on its website which provides citizens with the appropriate contacts for fair housing complaints.

SECTION VI: CITIZEN PARTICIPATION: INPUT AND PERCEPTIONS

This Analysis of Impediments will adhere closely to the Citizen Participation Plan as described in the City of Jacksonville Consolidated Plan. Key elements of the Consolidated Plan are their emphasis on the collaborative nature of the process.

The Consultant engaged in two major activities in order to gather citizen participation: surveying and a practitioners' luncheon. The results of each activity are detailed below.

A. Citizens Survey

A major component of the citizens' participation portion of the Analysis of Impediments is the Citizens Survey. This survey, developed by the Consultant, in conjunction with representatives from the City of Jacksonville, was intended to gather information from residents about the status of fair housing. The survey was intended to gather general information about citizen's experiences in obtaining housing, lending, etc. within the City and unincorporated County areas. The survey was not intended to be a statistical sampling of citizens, but rather a snapshot of experiences provided by interested citizens. The survey was distributed between December 2009 and February 2010. The survey was distributed via the following methods:

1. The City provided the consultant with a listing of its housing and housing-related partners and affiliates. This list consisted of municipal departments within the City and County government, quasi-governmental agencies, and local non-profits and housing developers, lending officers and those in real estate-related fields. The consultant distributed the survey via e-mail (and hard copy, if requested) to this list. These individuals were then asked to make the survey available to their clients and interested citizens.
2. Online – the survey was made available on the City's website.

Citizens Survey Results

There was very little participation in the citizen's survey, compared to the total population of the City. Therefore, the results cannot be considered a sample of any

type, but rather a snapshot of local perceptions. The responses below represent the most relevant and noteworthy results of the survey.

	Yes	No
Do You Live or Work within the City Limits?	31	6
Do you believe that discrimination in fair housing exists in the City of Jacksonville?	14	20
Have you ever experienced housing discrimination in the City of Jacksonville?	6	30

Have you ever experienced barriers to renting or buying a home (including lending)?

<u>Response</u>	<u>Number</u>
Have Not Experienced Barriers	31
Race	2
Color	1
Disability	3
Familial Status	3
National origin	3

What, in your opinion, are the biggest obstacles to obtaining affordable housing in the City of Jacksonville?

<u>Response</u>	<u>Number</u>
Lack of Affordable Housing	26
Discrimination (describe type)	26
Language Barriers	3
Inadequate Enforcement of Existing Laws	3
Unfair Lending Practices	5
Lack of Education about Fair Housing Rights and Responsibilities	14

Note that many respondents do not feel that there is discrimination in housing in the City of Jacksonville and many have never experienced discrimination in housing first-hand. Also, several of the respondents indicated that they did not report housing discrimination because they did not know where to complain. However, very few respondents indicated that they had been discriminated against, so it is not possible to determine if there is any pattern in reporting.

B. Practitioners Survey

In order to solicit the input of individuals who directly or indirectly provide housing to the public, the Consultant distributed a “Practitioners Survey”. This survey was distributed to individuals and organizations involved in real estate, insurance, mortgage lending, and housing industries, in both the public and private sectors. The response rate for the survey was extremely low; only eleven practitioners responded. Further, there were no significant comments or suggestions provided in the results. Therefore, the results will not be noted in this document, but they are available in the Appendix of this document.

C. Practitioners Luncheon

Despite the low response rate of the practitioners’ survey, the valuable input of local housing professionals was captured during a practitioner’s luncheon. The luncheon was held on March 4, 2010 and representatives from the mortgage lending, real estate and housing communities were invited to share their experiences and expertise in the area of fair housing in the City of Jacksonville. The perceptions and experiences of the practitioners represent anecdotal evidence of the local, formal and informal practices in the public and private sectors. Participants were presented with a brief demographic overview of the Jacksonville area and basic HMDA data, and then asked to provide their experiences and perceptions regarding fair housing in the area. Below is a synopsis of the comments:

General Comments

- There is very little data available about the disabled community which may lead to undercounting and no counting in the case of mortgage loans
- Transportation is an issue outside of the city limits (housing may be more affordable)
- Sidewalks are not available in all areas, making it difficult and unsafe to walk from many housing locations to work centers

Housing Issues

- Local builders don’t consider affordability in building homes or apartments

- \$725 is the average price for a 2BR apt in Jacksonville (compared to the FMR of \$618)
- Military housing allowance sets rent, non-military personnel cannot afford those rates
- Victims of domestic violence find it very difficult to obtain rental housing in Jacksonville
- Bare minimum number of disabled units for a complex (Builders are going to do bare minimum. They should build more universal design units)
- Allowance for curb cuts, but the tenant has to pay for extra accommodations (landlord can require tenants to put things back in place)
- More restrictions on income and credit now than in the past make it difficult to rent and purchase
- Many apartments do not accept Section 8 housing vouchers, which appears to be discriminatory to low-income and minority renters
- It is easier to obtain Section 8 vouchers in other places (Kinston, Carteret)
- Infrastructure built based on assumption that everyone owns their own car
- Citizens with misdemeanors or other criminal infractions find it hard to rent. There are similar issues for people with mental or behavioral issues.
- Builders say that they can't afford to build affordable housing due to cost of permits, site work, etc.
- Deposit is hard to come up with by low income persons, may need \$1,500 to move into apartment
- Have to have multi-pronged approach to solve problem
- Hard for small cities to compete with large cities for funds
- Section 8 needs more housing stock
- Need more non-profits to build houses
- There is a lack of housing stock because of military presence
- There are more rules for building houses
- Infrastructure cost mandated by regulations, drive up cost

- Most calls (firefighter, police) come from high density apartments. If you give tax breaks for landlords you take money away from services
- Long waiting lists for subsidized housing

Proposed Solutions

- The City could work to develop co-housing (like college apartments) with shared kitchens and bathrooms for 2-4 rooms
- Private developers could attempt to redesign buildings to increasing density
- The City, private developers and non-profit agencies could work to develop transitional housing (It is impossible to leave a homeless shelter or institutions to go to private apartments and afford \$725 rent). Non-profit agencies should provide and manage transitional housing.
- The City should consider tax credits to individual landlords (One participant noted that this proposal would also affect municipal service levels.)

SECTION VII: PRIVATE SECTOR LENDING POLICIES AND PRACTICES

The Federal Financial Institutions Examination Council (FFIEC) oversees the compilation of data from mortgage lenders as required under the Home Mortgage Disclosure Act (HMDA). HMDA data is usually compiled on the metropolitan statistical areas (MSA) level; Onslow County is a part of the Jacksonville MSA. Where possible, loan information regarding the City of Jacksonville was extracted from the larger MSA. However, the data represents the total MSA (which includes Onslow County, North Carolina), unless otherwise noted. The information reflected in the tables and charts below is for calendar year 2008 and accessed from the FFIEC website at <http://www.ffiec.gov>. It may also be helpful to note the income levels as designated by HUD and the US Census Bureau as described in the chart below:

Chart 2: Income Levels and Descriptions

% of MSA Median Family Income	Income Level	Median Family Income Jacksonville MSA, 2000 Census
< 50%	Low	\$33,763
Between 50% > 80%	Moderate	
Between 80% > 120%	Middle	
>120%	Upper	

Table 13: Disposition of Conventional Loan Applications, Jacksonville MSA, 2008

Disposition	City of Jacksonville		Total MSA
	#	% of Total MSA	
Loans Originated	457	43.7%	1,045
Apps. Approved but Not Accepted	33	37.1%	89
Apps. Denied	81	40.3%	201
Apps. Withdrawn	62	39.2%	158
File Closed/ Incomplete	19	54.3%	35

Source: HMDA Data, 2008; www.ffiec.gov

Table 14: Disposition of Conventional Loan Applications by Income Level

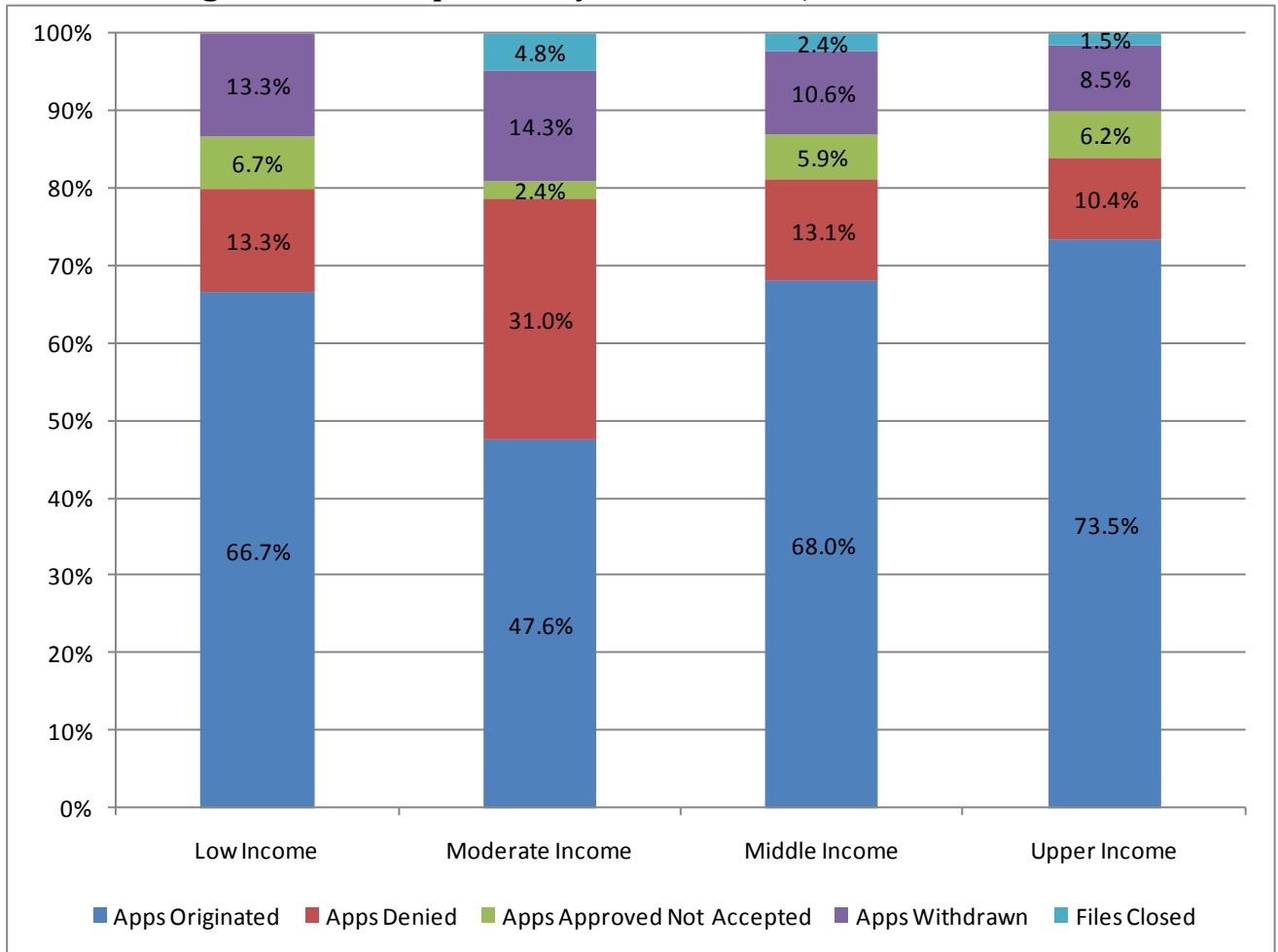
	Apps Recvd	% of All MSA Apps	Apps Originated	% of Income Level Apps	Apps Denied	% of Income Level Apps	Other	% of Income Level Apps
Low Income	15	1.0%	10	66.7%	2	13.3%	3	20.0%
Moderate Income	42	2.7%	20	47.6%	13	31.0%	9	21.4%
Middle Income	1,211	79.3%	824	68.0%	159	13.1%	228	18.8%
Upper Income	260	17.0%	191	73.5%	27	10.4%	42	16.2%

“Other” includes: Files closed for incompleteness, files withdrawn and applications approved but not accepted

The table above describes the disposition of loan applications of the whole MSA. As could be expected, the percent of loans originated rose in the upper income levels, and the percentage of loan applications which were denied increased at the lower income levels.

Loan approval and denial rates seem to be consistent with income as illustrated in **Figure 1** below.

Figure 1: Loan Disposition by Income Level, Jacksonville MSA



Disparity or barriers may be evident if minority applicants have higher rates of loan denials than non-minority applicants of the same income levels. This issue will be investigated further in the tables and charts below.

D. Loan Disposition at Middle Income Levels

Table 15: Loan Disposition Rates by Minority Status (Middle Income)

Minority Status*	Apps. Received (% of All Apps)		Loans Originated (% by Minority Status)		Apps. Denied		Apps. Approved but Not Accepted	Apps. Withdrawn	File Closed/ Incomplete
	#	%	#	%	#	%			
White, Non-Hispanic	223	74.6%	157	70.4%	27	12.1%	17	17	5
Others, Incl. Hispanic	76	25.4%	42	55.3%	18	23.7%	5	10	1
	299	100%	199		45				

Note: “Minority Status” combines information reported on race and ethnicity. “White Non-Hispanic” consists of applicants of White race who are not of Hispanic or Latino origin. The “Others, including Hispanic” category consists of applicants of minority races or Hispanic or Latino origin. Applicants not shown are Non-Hispanics where race is not available, Whites where ethnicity is not available and those where both race and ethnicity are not available.

Table 15 indicates that White, non-Hispanic (i.e. non-minority) applicants account for approximately 75% (223) of all applications at this income level; non-minorities account for 25.4% of applications at this income level. In 2008, almost 70% of applications made by non-minority applicants were approved and accepted. By comparison, 55% of loans by minority applicants were approved. Though there is a significant difference in the rates, the approval rates are relatively high (as compared to other local areas). Similarly, though the loan denial rate of minorities is double the denial rate of non-minorities, the rates themselves are relatively low.

First, minority and non-minority loan applicants at similar income levels have disparate loan origination rates. However, both groups have loan origination rates which are relatively high. Note that minorities only account for 25% of applicants. This rate of loan application is disproportionate to the percent of minority population. Therefore, further analysis of loan applications and lending patterns would be necessary to determine if there is an institutional barrier for the low rates of application. If there is a reason that minorities are not *applying* for loans in this area, it could be an impediment to their access to fair housing.

Next, the moderate income level will be analyzed to identify any patterns or barriers in lending at this income level. Note that the “moderate” income level is described as between 50% and 79% of the MSA median income.

Table 16: Conventional Loan Disposition Rates by Race at Moderate Income Levels

Minority Status*	Apps. Received (% of All Apps)		Loans Originated (% by Minority Status)		Apps. Denied		Apps. Approved but Not Accepted	Apps. Withdrawn	File Closed/ Incomplete
	#	%	#	%	#	%			
White, Non-Hispanic	103	82.4%	63	61.2%	25	24.3%	5	10	0
Others, Incl. Hispanic	22	17.6%	10	45.5%	6	27.3%	2	2	2
	125	100%	73		31				

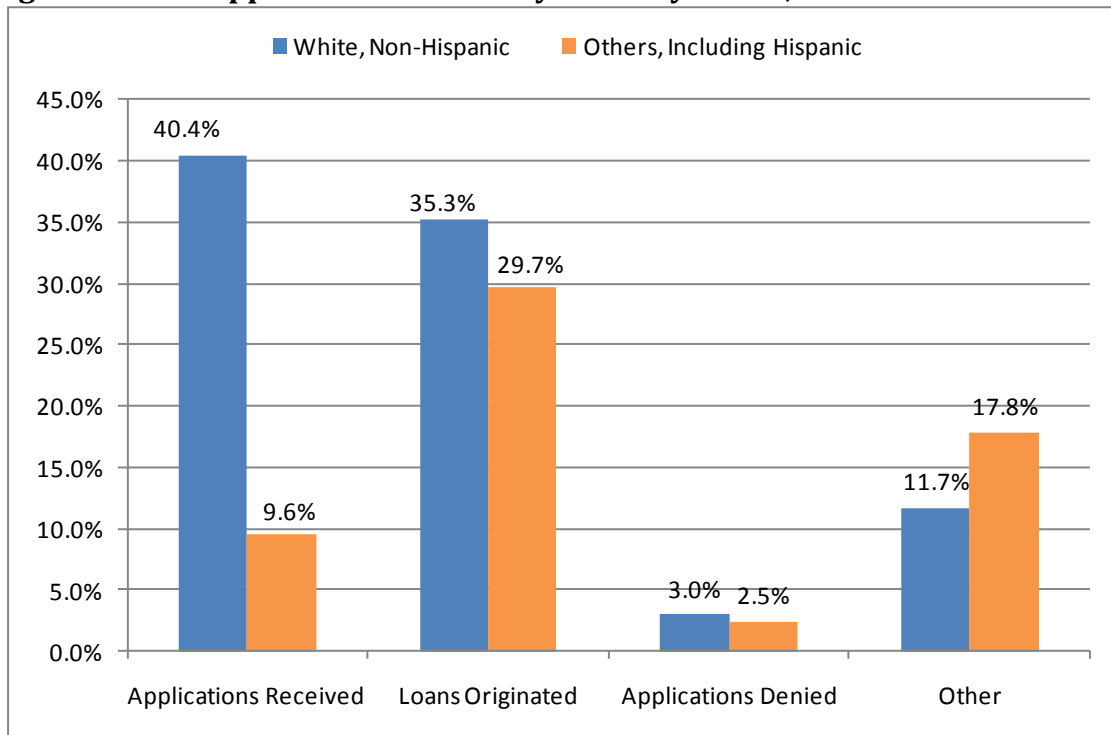
Table 16 indicates that White, Non-Hispanic (i.e. non-minority) applicants account for 82% (103) of all applications at this income level. Minority applicants account for 17.6% of all loans at this income level. Non-minority applicants had a loan origination rate of 61.2%. Minority applicants had a loan origination rate of 45.5%. Loan denial rates at this income are substantially similar between minorities and non-minorities. This indicates that though non-minorities have a better chance of obtaining a loan compared to minority applicants, their chances of being denied are equal to that of minority applicants. As in the case of middle income loan application, non-minorities are more likely to *apply* for loans. Again, this does not necessarily indicate discrimination in the market but further analysis is necessary to determine why minorities are not applying in this area.

Table 17: Conventional Denial Rates by Reason and Income Level

	Low Income		Moderate Income		Middle Income		Upper Income		Income Not Avail.		Total Denials
	#	%	#	%	#	%	#	%	#	%	
Debt to Income Ratio	5	33%	13	35%	17	33%	22	22%	0	0%	57
Empl. History	0	0%	0	0%	2	4%	2	2%	0	0%	4
Credit History	3	20%	12	32%	19	37%	12	12%	1	100%	47
Collateral	0	0%	3	8%	3	6%	25	25%	0	0%	31
Insufficient Cash	1	7%	2	5%	0	0%	10	10%	0	0%	13
Unverifiable Information	0	0%	1	3%	2	4%	6	6%	0	0%	9
Credit App Incomplete	0	0%	1	3%	0	0%	4	4%	0	0%	5
Mortgage Ins. Denied	0	0%	1	3%	0	0%	1	1%	0	0%	2
Other	6	40%	4	11%	9	17%	19	19%	0	0%	38
Total Denials/ Percent of Total Denials	15	100%	37		52	100%	101	100%	1	100%	

* May indicate multiple reasons for denial

Figure 2: Loan Approval and Denial by Minority Status, All Conventional Loans



After comparing similar incomes and overall loan dispositions, there is a slight discrepancy in the loan origination rates and denial rates between minorities and non-minorities. This is encouraging, as many MSAs report vast differences in loan

origination rates between minorities and non-minorities. However, there is a great disparity in loan application rates in this area. Non-minorities in this area apply for loans at a rate much higher than their proportion of the population. Similarly, non-minorities are not applying for mortgage loans in proportion to their percent of the population. There may be many reasons for the disproportion in loan applications. The City may investigate this statistic further to determine if there are any institutional reasons that prohibit or discourage loan applications by minorities.

E. National Community Reinvestment Coalition Report

The National Council of Negro Women (NCNW) is a council of national African-American women's organizations and community-based sections. The NCNW mission is to lead, develop, and advocate for women of African descent through research, advocacy, and national and community-based services and programs on issues of health, education, and economic empowerment in the United States and Africa. The National Community Reinvestment Coalition (NCRC) is an association of more than 600 community-based organizations that promote access to basic banking services, including credit and savings, to create and sustain affordable housing, job development, and vibrant communities for America's working families. The NCNW and NCRC partnered to develop a report which explores race and gender disparities in mortgage lending. The study provided valuable information on subprime and predatory.

“Subprime loans have an interest rate higher than prevailing and competitive rates in order to compensate for the added risk of lending to a borrower with imperfect credit. NCRC defines a predatory loan as an unsuitable loan designed to exploit vulnerable and unsophisticated borrowers. Predatory loans are a subset of subprime and non-traditional prime loans. A predatory loan has one or more of the following features:

- 1) Charges more in interest and fees than is required to cover the added risk of lending to borrowers with imperfect credit;*
- 2) Contains abusive terms and conditions that trap borrowers and lead to increased indebtedness;*
- 3) Does not take into account the borrower's ability to repay the loan; and*

4) Violates fair lending laws by targeting women, minorities, and communities of color.

The steering of borrowers into high-cost loans results in lost home equity and has contributed to inequalities in wealth-building, which is especially pronounced in minority communities” (National Council of Negro Women & National Community Reinvestment Coalition 2009).

Lending Patterns

NCRC examined lending patterns by analyzing 2007 HMDA data:

In 2007, NCRC examined lending disparities between minorities and whites, while controlling for income and gender, across various metropolitan areas. NCRC developed eight fair lending indicators which assess the extent of differences in the percentage of high-cost loans to whites and males vs. minorities and females. Metropolitan areas with fewer than 50 prime loans or 50 high-cost loans for any group of borrowers were excluded from one or more of the eight fair lending indicators because of insufficient data from which to draw meaningful conclusions. For each of the fair lending indicators, the metropolitan areas were ranked for lending disparities (The lending analysis of low- and moderate-income African-American females vs. white females reveals significant disparities in lending. Almost 70 percent of all metropolitan areas included in this analysis (76 out of 109) had a high-cost disparity ratio of two or above. This indicates that low- and moderate-income African-American females were more than twice as likely to receive high-cost loans as low- and moderate-income white females in the majority of metropolitan areas examined. In 2007, low- and moderate-income African-American females were more than three times as likely to receive high-cost loans compared with low and moderate-income white females in the following 10 metropolitan areas:

1. Milwaukee-Waukesha-West Allis, WI
2. Wilmington, NC
3. Chicago-Naperville-Joliet, IL
4. Harrisburg-Carlisle, PA
5. Durham, NC
6. Raleigh-Cary, NC
7. Charleston-North Charleston, SC

8. Sarasota-Bradenton-Venice, FL
9. Hartford-West Hartford-East Hartford, CT
10. Lafayette, LA

Though Jacksonville, North Carolina was not included in this study, it is noteworthy that there are three North Carolina metropolitan statistical areas in the study.

SECTION VIII: IMPEDIMENTS TO FAIR HOUSING CHOICE IN JACKSONVILLE, NC

The following sections describe possible Impediments to Fair Housing within the City of Jacksonville which were discussed earlier in this document.

A. Lack of affordable housing, specifically for disabled and low-income populations

Service providers report that demand exceeds the supply of accessible, subsidized units for disabled individuals. The lack of affordable rental housing, especially for elderly, disabled and other special populations is well documented, by the Consolidated Plan, and practitioner's comments.

Recommended Actions:

1. Assist non-profit organizations in developing housing options for special populations. This could include providing technical support in applying for state and Federal grants, or adjusting permitting and building fees to facilitate and encourage affordable housing within the City.
2. Review, and if necessary, revise zoning ordinances to permit single room occupancy units within the City limits.

B. Lack of public transportation options

As discussed earlier in this document, lack of transportation throughout the City may limit housing availability to special populations (i.e. low income families and seniors) in those areas.

Recommended Actions:

Collaborate with transit authorities to improve and expand public transit routes and hours of operations, specifically in housing and employment centers.

C. Lack of fair housing education

The City utilizes its Community Development Division to field fair housing complaints and provide education on state and Federal fair housing laws. Though the City does not have a local fair housing ordinance, lack of an ordinance does not constitute an impediments. However, additional education for citizens may lead to more awareness

of fair housing rights and discriminatory practices, which could aid the City in its desire to further fair housing. Further, a lack of education about best practices may lead to unintentional violations of fair housing laws by landlords, housing providers, real estate agents, etc. Therefore, additional education and promotion of basic fair housing rights may benefit the City and its citizens.

Recommended Actions:

1. The City should consider soliciting an intern from a local college to institute basic practices with regard to fair housing. Responsibilities of the intern may include:
 - Disseminating fair housing information to practitioners in the housing and lending industry, non-profit agencies and local advocacy organizations
 - Developing and monitoring a telephone hotline (or voice mailbox) through which citizens can request information about fair housing or report suspected housing discrimination
 - Work with the City to maintain fair housing information on its website and through its non-profit partnerships

The intern could serve as a conduit of information between local citizens regarding fair housing. Further, the intern could assist citizens in contacting the appropriate agencies to report fair housing violation. It would be helpful if the intern were bilingual (i.e. Spanish-speaking) to accommodate the growing Hispanic community. Though it is not necessary for the intern to *investigate* housing discrimination it is significant that local citizens have access to information.

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Appendix

Citizen's Participation Survey

Practitioner's Survey

Areas of Minority Concentration

City of Jacksonville Transit Maps

Memorandum

Date:

To: Citizens and Housing Development Community

From: Ken Weeden and Associates, Inc., Planning Consultants

Re: **SURVEY:** Impediments to Fair Housing Analysis in the City of Jacksonville

Ken Weeden & Associates, Inc., is assisting the City of Jacksonville in conducting a Fair Housing Impediments Analysis. The purpose of the analysis is to help the City comply with U.S. Department of Housing and Urban Development requirements, and to help develop a plan to address identified problems in order to better promote Fair Housing in the City.

The Fair Housing Act prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, or disability by housing providers, and lenders, including landlords and real estate companies.

We are contacting local organizations, agencies involved in various aspects of housing, to seek input for this analysis. We hope that you will help us identify factors which may constitute impediments to Fair Housing choice in the City of Jacksonville.

We would also like representative input from you or your agency to complete the attached questionnaire and return it to:

Ken Weeden & Associates, Inc.
Fair Housing Study – City of Jacksonville
Fax: (910) 762-5963
E-mail: isaiah-hunter@kwaplanning.com

We have also attached sample information which defines what is considered discrimination or “impediments” to Fair Housing choice. If you have questions, or would like to provide additional input to this study, please contact Isaiah Hunter at (888) 762-6296. Thank you for your time and input.

PRACTITIONER'S SURVEY

Impediments to Fair Housing Analysis: Survey

Ken Weeden & Associates, Inc. is conducting an analysis of Impediments to Fair Housing in the City of Jacksonville. The purpose of the analysis is to assist the City in promoting Fair Housing. We are specifically seeking information regarding the housing market and housing opportunities in the City of Jacksonville. Your input is appreciated!

I represent the following: *(Please Check One Only)*.

Real Estate agency

Housing Service Provider

Lender/ Appraiser

Insurance

Developer/ Builder

Other

1. Are you/or your agency/organization aware of the basic Fair Housing requirements (which prohibits discrimination in buying, selling, renting, or lending, if based on race, color, religion, sex, natural origin, family status, or handicap)? Yes No
2. Are you/or your agency/organization aware of any "Fair Housing Complaints" within the past five (5) years? (i.e., in buying, selling, renting, lending, appraisal, or insuring property?) Yes No
If **yes**, please describe briefly below, or attach additional information.
 - a.
 - b.
3. What, in your opinion or assessment, are the **major** problem(s) inhibiting Fair Housing choice in the City of Jacksonville? (Please list, if any).
 - a.
 - b.
4. What solutions do you think might resolve the problem(s)? (Attach additional response if needed).
 - a.
 - b.

IF YOU ARE A LENDER, PLEASE ANSWER QUESTIONS #5 AND #6.

5. Does your institution have special Community Reinvestment Act (CRA) projects/activities or initiatives which target the City of Jacksonville? Yes No
(Please list 2-3 examples, if any. Attach additional info, if desired).
 - a.
 - b.
 - c.
6. What criteria or standards do you use in your assessments? (Attach additional response if needed.)

(Optional)

Name:	Organization/ Business:
Telephone Number: ()	Email address:

Please return this survey via fax to (910) 762-5963 or via e-mail to isaiah-hunter@kwaplanning.com

Memorandum

Date: July 9, 2010

To: Citizens and Housing Development Community

From: Ken Weeden and Associates, Inc., Planning Consultants

Re: **SURVEY:** Impediments to Fair Housing Analysis in the City of Jacksonville

Ken Weeden & Associates, Inc., is assisting the City of Jacksonville in conducting a Fair Housing Impediments Analysis. The purpose of the analysis is to help the City comply with U.S. Department of Housing and Urban Development requirements, and to help develop a plan to address identified problems in order to better promote Fair Housing in the City.

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We have also attached sample information which defines what is considered discrimination or “impediments” to Fair Housing choice. If you have questions, or would like to provide additional input to this study, please contact Isaiah Hunter at (888) 762-6296. Thank you for your time and input.

EXAMPLES OF UNLAWFUL DISCRIMINATORY HOUSING PRACTICES

(when based on Race, Color, Religion, Sex, National Origin, Familial Status, or Handicap)

- Steering - attempting to influence where someone lives based on the protected status of the person, or the neighborhood
- Redlining - refusing to lend money because house is in minority neighborhood
- Retaliation against someone who files a complaint, or against an investigation witness
- Blockbusting - inducing panic selling with references to change in neighborhood demographics
- Solicit, accept, use or retain real estate listing understanding that discrimination may occur in a real estate transaction
- Not providing maintenance and services, or providing unequal maintenance and services
- Discriminatory advertising
- Enforcing tenant rules unequally
- Segregation within complex or within buildings
- Falsely denying housing is available
- Not allowing use of facilities connected with housing, or allowing use under different terms
- Refusal to make a real estate loan
- Refusing to allow a person to apply for housing
- Screening applicants differently
- Refusing to sell
- Refusing to rent
- Charging different rent
- Charging different security deposit
- Charging different purchase price
- Different terms of purchase contract
- Different terms of lease
- Refusing to transmit an offer to buy or rent
- Foreclosure
- Harassment, coercion, or intimidation by neighbors
- Refusing membership in brokers association
- Different terms of a real estate loan
- Refusing membership in multiple listing service
- Harassment, coercion, or intimidation by landlord
- Discrimination in providing brokerage services

CITIZEN'S SURVEY

Impediments to Fair Housing Analysis: Survey

On behalf of the City of Jacksonville, Ken Weeden & Associates, Inc. is conducting an analysis of Impediments to Fair Housing choice. The purpose of the analysis is to assist the City in their efforts to comply with HUD requirements and to promote Fair Housing. We are specifically seeking information on elements, other than income, which obstruct fair housing opportunities in Jacksonville. Your input is appreciated!

Personal Experiences

1. Do you live or work in the City of Jacksonville? Yes No
2. Do you believe that discrimination in fair housing exists in the City of Jacksonville? Yes No
(See attachment)
3. Have you ever experienced barriers to renting or buying a home (including lending) because of race, color, national origin, religion, family status, gender, disability, or sexual orientation?—Check *all* that apply.
 Have not experienced any barriers Race Color Religion
 Gender Disability Familial status
 National origin
4. If you answered **Yes** to Question 3, were you attempting to: Rent Purchase a home
 Obtain financing
5. Have you ever experienced housing discrimination in the City of Jacksonville? Yes No
6. If you answered yes in question 5, have you reported the incident?
 Yes No, don't know where to report
 No, afraid of retaliation No, don't believe it makes any difference
 No, too much trouble
7. Are you aware of *other* persons or situations wherein it *appeared* that Housing discrimination was a factor in the City of Jacksonville? Yes No (If "no", please skip to question #9)
8. If you answered **Yes** to Question 7, what basis do you believe was the cause? Select all that apply.
 Race color religion gender
 Disability familial status national origin
9. If you answered **Yes** to Question 7, were they:
 Attempting to Rent Attempting to Purchase a home Both (if multiple occasions)
10. If you answered **Yes** to Question 7, what relationship were the individuals to you?
 Family Friends Client Other (please specify)

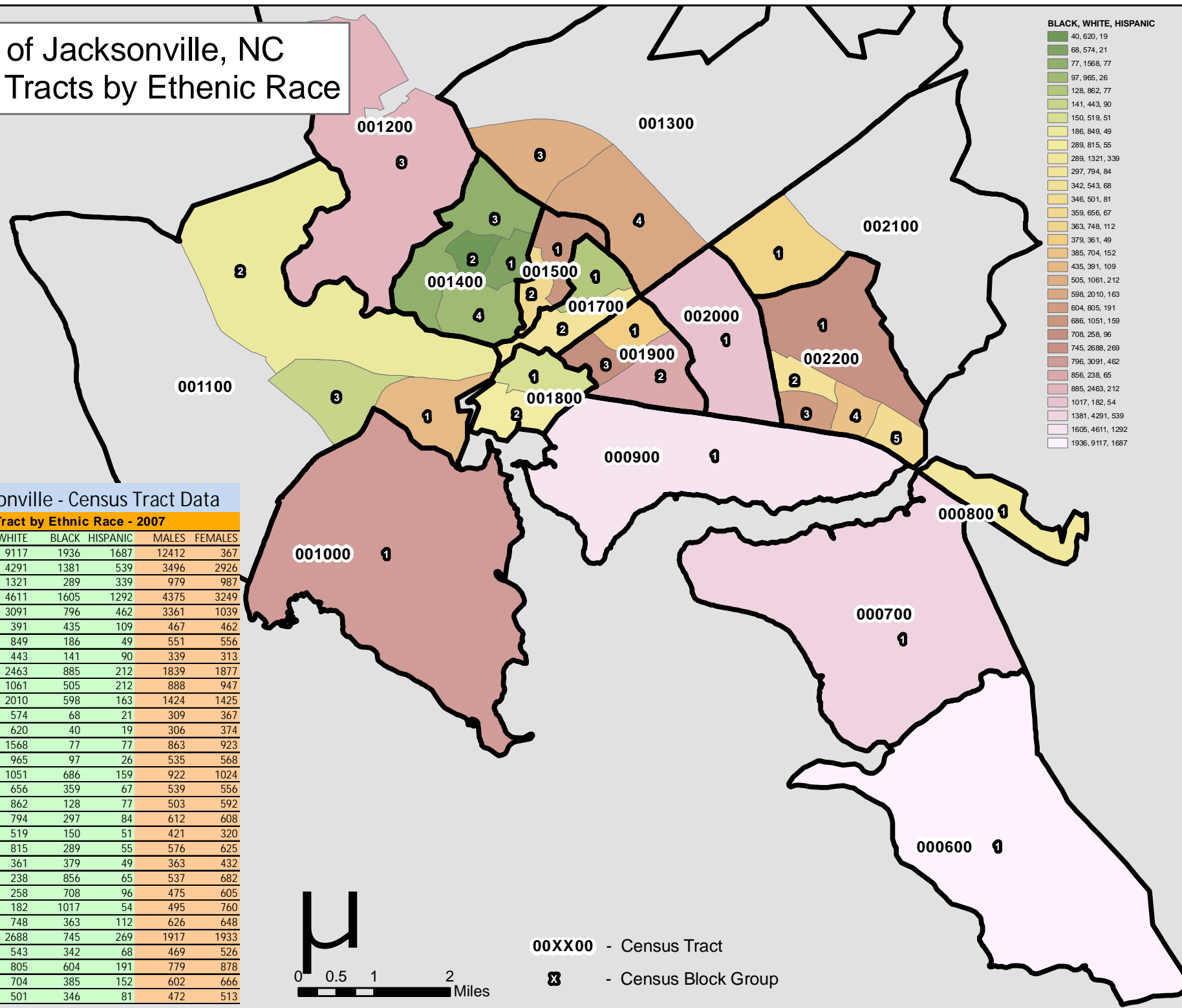
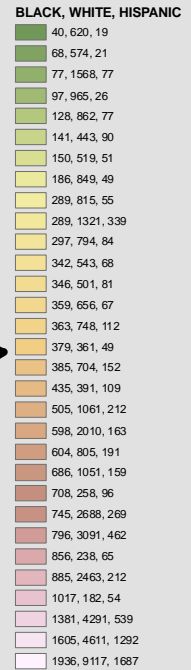
CITIZEN'S SURVEY

11. What, in your opinion, are the biggest obstacles to obtaining affordable housing in the City of Jacksonville? (Select a maximum of 3)

- | | |
|--|---|
| <input type="checkbox"/> Lack of Affordable Housing | <input type="checkbox"/> Discrimination (describe type) |
| <input type="checkbox"/> Language Barriers | <input type="checkbox"/> Inadequate Enforcement of Existing Laws |
| <input type="checkbox"/> Unfair Lending Practices | <input type="checkbox"/> Lack of Education about Fair Housing Rights and Responsibilities |
| <input type="checkbox"/> Other (<i>please specify</i>) | |

For questions or additional information, please contact Isaiah Hunter at (888) 762-6296. Please return this survey via fax to (910) 762-5963, or e-mail: isaiah-hunter@kwaplanning.com

City of Jacksonville, NC Census Tracts by Ethenic Race



City of Jacksonville - Census Tract Data

Census Tract by Ethnic Race - 2007

TRACT	BLKGRP	WHITE	BLACK	HISPANIC	MALES	FEMALES
600	1	9117	1936	1687	12412	367
700	1	4291	1381	539	3496	2926
800	1	1321	289	339	979	987
900	1	4611	1605	1292	4375	3249
1000	1	3091	796	462	3361	1039
1100	1	391	435	109	467	462
1100	2	849	186	49	551	556
1100	3	443	141	90	339	313
1200	3	2463	885	212	1839	1877
1300	3	1061	505	212	888	947
1300	4	2010	598	163	1424	1425
1400	1	574	68	21	309	367
1400	2	620	40	19	306	374
1400	3	1568	77	77	863	923
1400	4	965	97	26	535	568
1500	1	1051	686	159	922	1024
1500	2	656	359	67	539	556
1700	1	862	128	77	503	592
1700	2	794	297	84	612	608
1800	1	519	150	51	421	320
1800	2	815	289	55	576	625
1900	1	361	379	49	363	432
1900	2	238	856	65	537	682
1900	3	258	708	96	475	605
2000	1	182	1017	54	495	760
2100	1	748	363	112	626	648
2200	1	2688	745	269	1917	1933
2200	2	543	342	68	469	526
2200	3	805	604	191	779	878
2200	4	704	385	152	602	666
2200	5	501	346	81	472	513



00XX00 - Census Tract
 x - Census Block Group

City of Jacksonville – Daytime Transit Map



City of Jacksonville – Holiday Transit Map

