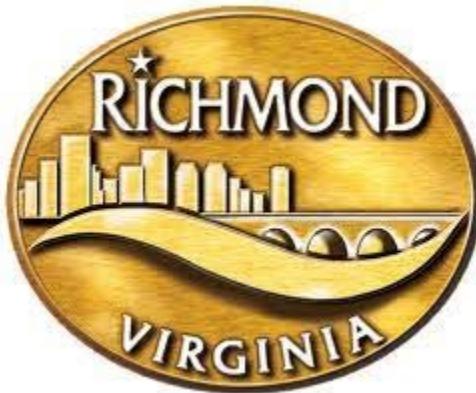


# **Analysis of Impediments to Fair Housing Choice (Update)**

*City of Richmond, Virginia*  
**2017-2020**



**Department of Economic and Community Development  
Community Development Block Grant Program**

Main Street Station  
1500 East Main Street, Suite 400  
Richmond, VA 23219



I. **Cover Sheet**

1. Submission date:
2. Submitter name:
3. Type of submission (e.g., single program participant, joint submission): Single Program Participant
4. Type of program participant(s) (e.g., consolidated plan participant, PHA): Consolidated Plan Participant
5. For PHAs, Jurisdiction in which the program participant is located:
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
  - a. Name:
  - b. Title:
  - c. Department:
  - d. Street address:
  - e. City:
  - f. State:
  - g. Zip code:
8. Period covered by this assessment: 2017-2020
9. Initial, amended, or renewal AFH: Analysis of Impediments to Fair Housing Choice Update
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

(Signature) (date)

(Signature) (date)

12. Departmental acceptance or non-acceptance:

(Signature) (date)

Comment

## **II. Executive Summary**

This document serves as the update to the City of Richmond's Analysis of Impediment to Fair Housing Choice. This update was stipulated in a conciliation and voluntary compliance agreement between the United States Department of Housing and Urban Development and the City of Richmond. The agreement went into effect on 7/12/16.

Technically, this document serves as an update to the City's Analysis of Impediments to Fair Housing Choice. However, follows the new Assessment of Fair Housing process as closely as possible. As such, this document should serve as the basis for which future fair housing planning is built. Much of the following document is an examination of data that paints a clear picture of segregation, racially/ethnically concentrated areas of poverty, disparities in access to a variety of opportunity factors including jobs, proficient schools, and transportation, and disproportionate housing needs in the City of Richmond. The document then identifies factors that contribute to fair housing issues. These factors such as private market discrimination, lack of regional transportation, limited housing and employment options for city residents, and economic and social isolation contribute to fair housing issues which shall be addressed. The goals outlined below form the basis of actions that the city shall take to affirmatively further fair housing and ensuring that all residents have equitable access to opportunity. The summary of goals that follows is not listed in order of importance.

### **Summary of Goals**

1. Increase access to accessible housing for persons with disabilities
2. Decrease racial/ethnic disparities in access to opportunities
3. Decrease disproportionate housing needs among minority and low-income households
4. Expand Fair Housing Capacity
5. Reduce concentrated areas of racial/ethnic poverty
6. Decrease residential segregation

### **III. Community Participation Process**

1. *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.*
2. *Provide a list of organizations consulted during the community participation process.*
3. *How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.*
4. *Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

Given the time constraints imposed on this project, which technically serves as an update to the City of Richmond's 2013 Analysis of Impediments to Fair Housing, a full public outreach strategy was not undertaken as outlined in the new AFH format. Instead, targeted meetings with specific community members with expertise in housing and housing related fields, and specific knowledge of previously identified issues, were undertaken in lieu of more extensive public outreach.

It should be noted that when the City submits its first complete Assessment of Fair Housing in 2020, a broader, more substantive community participation process must be undertaken. A recommendation included in Section VI. Goals and Priorities, of this document suggests that the City must allow for a greatly extended timeframe for the completion of the AFH. The broad parameters of Affirmatively Furthering Fair Housing extend well beyond simple discrimination. There are simply an overwhelming number of projects, efforts, and organizations that are working to affirmatively further fair housing across the city. Most of them doing so without the slightest inclination that they are thus engaged. A proper public engagement process will enable to City to more comprehensively identify remaining systemic gaps, ensure that resources aren't duplicated, and begin to close racial/ethnic disparities.

During the development of this report, several events took place that bear witness to the considerable momentum within the Richmond Region to Affirmatively Further Fair Housing, that are worth mentioning:

Housing Opportunities Made Equal of Virginia, in partnership with Virginia Commonwealth University's L. Douglas Wilder School of Government and Public Affairs recently held a full day conference on Affirmatively Furthering Fair Housing. Over 200 local government officials, staff, housing and social justice advocates, and community members attended. This attendance is indicative of a broader community desire to learn more and commitment to social justice and the spirit of Affirmatively Furthering Fair Housing.

Secondly, The Robert Wood Johnson Foundation recognized the City of Richmond as one its 2017 Culture of Health Prize Winners. A large part of this recognition was due in part to the public and

community health sector recognizing and addressing the role that historic and ongoing discrimination has played in the outcomes of Richmond residents for decades. This commitment to health equity underscores the momentum that currently exists within the City to build truly inclusive communities.

The organizations consulted during the development of this document update included:

- Housing Opportunities Made Equal of Virginia
- Richmond Redevelopment and Housing Authority
- Office of Community Wealth Building
- Richmond Legal Aid Justice Center
- The Sacred Heart Center
- Virginia Poverty Law Center
- The Mobile Home Park Coalition

A community meeting was held on September 23<sup>rd</sup> at the Main Richmond Public Library. This event was organized by Councilperson Ellen Robertson and was attended by approximately 40 community members.

## **IV: Assessment of Past Goals, Actions, and Strategies**

1. *Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:*
  - a. *Discuss what progress has been made toward their achievement;*
  - b. *Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and*
  - c. *Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.*
  - d. *Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

The most recent Analysis of Impediments to Fair Housing Choice, completed in 2013, identified the following five, broad impediments to fair housing choice:

1. The economic and social isolation of many inner-city neighborhoods restricts housing choice for a significant number of low-income, disabled, elderly, and minority residents.
2. There is a lack of accessible housing affordable to families and individuals earning 50% or less of the Area Median Income.
3. Private market practices in leasing and lending disadvantaged minorities, people with disabilities, and families with children.
4. Source of legal income discrimination limits housing choice.
5. Public transportation limits the ability of many residents to choose where they would like to live.

The suggested strategies to amend these impediments were two-pronged: Opportunities must be cultivated in low opportunity neighborhoods while concurrently ensuring that barriers to accessing high opportunity neighborhoods are removed. Though the impediments were purposefully broad in scope, the strategies selected to overcome them were narrowly focused. The following is a summary, by individual impediment, of the actions taken over the past several years.

- 1. The economic and social isolation of many inner-city neighborhoods restricts housing choice for a significant number of low-income, disabled, elderly, and minority residents.**

Goals called for acting on specific recommendations outlined in the Mayor's Anti-Poverty Commission Report, specifically the redevelopment of public housing. In December 2015, Richmond City Council took a critical step in following the recommendations outlined in the Mayor's Anti-Poverty Commission Report by creating the Office of Community Wealth Building (OCWB). In doing so, the City formally acknowledged the role that local government not only played in creating segregated neighborhoods of concentrated minority poverty, but the role that it must play in the future to overcome historic injustices.

The goal of the OCWB is to alleviate systemic and structural barriers so that 1,000 citizens each year can move to a thriving level of economic stability.<sup>1</sup> The OCWB aims to accomplish this feat by creating a

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<sup>1</sup> Mayor Levar Stoney. Annual Report on Poverty Reduction and Community Wealth Building Initiatives in the City of Richmond, Virginia. February 27, 2017.

[http://www.richmondgov.com/CommunityWealthBuilding/documents/Mayors\\_Annual\\_Report\\_on\\_Poverty\\_Reduction\\_2017.pdf](http://www.richmondgov.com/CommunityWealthBuilding/documents/Mayors_Annual_Report_on_Poverty_Reduction_2017.pdf)

system of pathways to building wealth by targeting resources and harnessing existing assets in historically disinvested neighborhoods across three specific areas: Education, Workforce Innovation, and Neighborhood Transformation.

The first goal focused on pursuing “a deliberate plan for best practice, model example public housing redevelopment without displacement.”<sup>2</sup> The Richmond Redevelopment and Housing Authority (RRHA) has initiated several projects to equitably redevelop public housing within the city. To date, RRHA has converted 77 units at Fay Towers to the Rental Assistance Demonstration (RAD) program. The remaining 123 units at Fay Towers remain as public housing but are in the process of being converted under RAD dependent upon financial closings expected later this year. Unfortunately, RRHA had to dispose of 121, mostly single-family, scattered site homes that were part of the homeownership program initiated by RRHA in 2007. 11 homes were sold to qualifying residents. Of the remaining 110 homes, RRHA received approval from HUD to dispose of 66 homes; 28 were sold at auction and 38 were transferred to local non-profit developers to rehabilitate into affordable housing. The remaining 44 homes have been removed from the homeownership program and are awaiting HUD approval to be disposed of. At the time of this writing, RRHA has plans for several projects most notably a mixed income development in Jackson Ward is awaiting financial closing and the redevelopment of Creighton Court for which site work is currently underway. The Creighton Court redevelopment project is a mixed income, mixed use project with a percentage of units available for homeownership.

The second goal was to “strengthen the Pre-K-12 educational pipeline: early childhood investments, Richmond Promise scholarships, greater vocational training.”<sup>3</sup> Much of this work has begun under the OCWB. Partnerships with Richmond public schools have been forged to promote systemic improvements to early childhood education including the launch of the RVA Reads program promoting early literacy in Pre-K classrooms and grant support from the W.K. Kellogg Foundation. Additionally, NextUp RVA which provides high quality out-of-school support for city youth and RVA Future, a career and college readiness initiative were launched to address critical education gaps. Most recently, Mayor Levar Stoney announced the Education Compact, a guiding document between City Council, the Richmond School Board, Richmond Public School Administration and the Mayor’s Office. The purpose of the compact is to increase organizational collaboration to improve academic progress and the lives of children through support services and poverty reduction. Currently, the compact is in the process of forming an advisory committee of residents to guide the work of the compact. This is a radical departure from business as usual and if successful will ultimately work to overcome numerous disparities across the city.

The third goal was to target the city’s rapidly growing Hispanic community for fair housing, landlord/tenant, consumer protection, and financial literacy education. The City contracted with Housing Opportunities Made Equal to conduct targeted outreach and educational opportunities in the Hispanic community.

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<sup>2</sup> Mayor’s Anti-Poverty Commission (Chair, Ellen Robertson), Mayor’s Anti-Poverty Commission Report to Dwight C. Jones, Mayor of City of Richmond, 105.

<sup>3</sup> Ibid.

**2. There is a lack of accessible housing affordable to families and individuals earning 50% or less of the Area Median Income.**

Goals for this impediment were focused upon exploring alternative sources of funding for the development of accessible housing affordable to families and individuals earning 50% or less of the area median income and ensuring that existing financial incentives appropriately address the affordable housing needs of the city.

Progress made on these goals include the creation of the Maggie Walker Land Trust to ensure permanent affordable housing across the city. As of the writing of this report, the first home in the land trust has closed and several more are in the pipeline. Additionally, an Ordinance is before the City Council to designate the Maggie Walker Land Trust as the City's land bank entity. This will ease the transfer of the City's surplus of severely tax delinquent properties into permanent affordable housing while also allowing other non-residential uses such as community gardens.

Currently, the Mayor is forming a housing task force to specifically address housing issues in the city. Among the elements included in the draft strategic plan are finding a dedicated source of funding for the City's Affordable Housing Trust Fund and updating the City's Affordable Dwelling Unit Ordinance.

**3. Private market practices in leasing and lending disadvantaged minorities, people with disabilities, and families with children.**

The broad goals highlighted to address this impediment included increasing minority access to sustainable mortgage products and removing the barriers that limit minority access to credit. Specific strategies included the continued support of financial literacy, homeownership, and credit repair counseling, enhancing workforce development, and coordinating a roundtable of area lenders, mortgage brokers, real estate agents and housing non-profits to address increasing minority access to credit. Additionally, strategies included supporting routine rental testing, the publication of a report examining the practices of the city's primary lending institutions.

Since the writing of the 2013 Analysis, significant progress was made on the goals to address this impediment. The City has continued to devote financial resources to financial literacy, homeownership, and foreclosure prevention education services while also providing financial support to qualifying, low-income, first-time homeowners with down payment assistance.

The OCWB has undertaken the task of strengthening workforce development through its development of a fully funded workforce initiative, the Center for Workforce Innovation, designed to connect residents to employment opportunities as well as the creation of a social enterprise strategy to leverage community assets to support local job creation.

Richmond Councilperson Ellen Robertson commissioned a report which examined the practices of the Cities 5 largest mortgage lenders. The outcome of this report was unexpected, SunTrust Mortgage responded proactively to the findings and launched a series of ongoing community conversations with a broad coalition of housing industry representative from both the public and private sectors to better understand their role in addressing inequality in the city. To date they have secured funding for

homeownership education and counseling to 50 residents and begun the process of identifying community assets to collaborate with in several disinvested neighborhoods throughout the city.

Additionally, Housing Opportunities Made Equal of VA pursued identified issues with Wells Fargo which resulted in partnership agreement to increase homeownership opportunities and expand mortgage lending to African Americans and African-American neighborhoods in the Richmond Metro Region. This partnership, created in July 2017 provides over \$4 million in financial support for program support and down payment assistance. To date, the first down payment grant has been administered. This partnership will undoubtedly increase legitimate credit opportunities available to disinvested neighborhoods and disenfranchised communities.

#### **4. Source of legal income discrimination limits housing choice.**

The goals set forth to remediate this impediment were to increase the number of landlords that accept housing choice vouchers and promote and support efforts to have source of legal income added as a protected class under the Virginia Fair Housing Act.

The City through both CDBG funding and its Affordable Housing Trust fund have supported mobility counseling for the past several years. Over 300 voucher holders have received counseling and 100 have used the mobility counseling program to find housing in the neighborhood of their choice.

The city does not engage the use of a legislative liaison/lobbyist relying instead upon the lobbying efforts of various bodies that support municipalities statewide. However, Housing Opportunities Made Equal of VA has worked over the past several years to have legislation passed at the Virginia General Assembly to have source of legal income added as a protected class to the State's Fair Housing Act.

#### **5. Public transportation limits the ability of many residents to choose where they would like to live.**

When asked about the most significant barriers to housing choice, almost every respondent indicated that the lack of truly regional public transportation was if not the single largest barrier, a close second. Arguably, the goals outlined to address this impediment were the loftiest and most expensive. As such, most of them were not addressed. However, the most significant investment in public transportation in the Richmond region in decades has been made and is currently slated to go online in the coming months. The Greater Richmond Transit Company (GRTC) in partnership with the U.S. Department of Transportation, Virginia Department of Transportation and Department of Rail and Public Transportation, the City of Richmond, and Henrico County is set to begin operation of the GRTC Pulse, a modern, high quality, high capacity bus rapid transit system that will serve a 7.6-mile route bisecting the City east to west. This corridor will support 33,000 residents and 77,000 jobs within a half mile radius.

## **V. FAIR HOUSING ANALYSIS**

Perhaps no other city captures the American story as fully as does the City of Richmond, Virginia. From the settlement at the falls of the James River in 1607, to the spark of revolution delivered by Patrick Henry at St. John's Church in 1775, to the capital of the Confederate States of America, Richmond has borne witness to nearly all aspects of this country's history. It is this history, much of which is rooted in egregious racial injustice that still impacts the city's residents today. Understanding this history is a critical step in identifying and addressing those factors that continue to limit opportunity for far too many. The following discussion is far from an exhaustive discourse of the impacts of discriminatory public policy, but rather serves to highlight some of the largest, most destructive programs.

Richmond's segregated housing patterns began in earnest with the introduction of the nation's first electric street car system in 1888. By allowing upperclass residents, who at that time were overwhelmingly, if not all white, access to new residential areas on the periphery of the city, the street car system helped foster residential patterns that exist to this day. In 1911, Richmond City Council adopted a residential segregation ordinance which established separate zone for black and white residents. A year later, the Virginia General Assembly passed legislation permitting all cities and towns in the state to adopt residential segregation ordinances. This form of de jure segregation was upheld by the Virginia Supreme Court in 1915 in *Hopkins v. City of Richmond*. The U.S. Supreme Court took up the case of residential segregation ordinances in 1917 finding them to be unconstitutional in *Buchanan v. Warley*. Not to be denied the ability to impose de jure segregation upon its residents, in 1924 the Virginia General Assembly passed S.B. 219 *To Preserve Racial Integrity*. This law required that every person be divided into one of two classifications: white or colored. It also strengthened the State's anti-miscegenation law by making it illegal for people of the two classifications to marry. In 1929, Richmond City Council adopted an ordinance based on this law which defined residential zones to be inhabited only by persons who could legally marry one another. Discrimination in the private market, in the form of restrictive covenants, ensured that blacks were unable to purchase homes in white neighborhoods. It wasn't until 1948 that the U.S. Supreme Court decided in *Shelley v. Kraemer* that restrictive covenants were unconstitutional. Further, it wasn't until 1967, in *Loving v. Virginia* that the high court ruled that laws prohibiting interracial marriage were unconstitutional.

The Great Depression of the early 1930s prompted a significant increase in the role of the federal government. The New Deal, enacted under the administration of Franklin D. Roosevelt, included several programs designed to stabilize the nation's housing market by mitigating foreclosures and incentivizing homeownership. The National Housing Act of 1934 created the Federal Housing Administration (FHA) to insure loans made by private lending institutions. This reduced the risk of making loans, allowing lenders to extend credit to households that did not qualify under tighter underwriting standards. In short, the FHA made it easier to access credit and, by extension, lowered barriers of entry into the housing market. Homeownership became an option for a broad range of income levels and a hopeful prospect for even more. The concepts of prosperity and social mobility – opportunity – at the root of the American Dream became synonymous with the single-family home. However, the FHA's underwriting manual stated, "If a

neighborhood is to retain stability, it is necessary that properties shall continue to be occupied by the same social and racial classes.”<sup>1</sup>

At about the same time, one of the most destructive housing programs, the Home Owners Loan Corporation (HOLC) was created. In short, the HOLC was designed to refinance mortgages with extended amortization periods to stem the tide of foreclosure sweeping the nation. To do so, the HOLC created “residential security maps” that categorized neighborhoods on a four-tier scale. The purpose of these maps was ostensibly to identify the neighborhoods most suitable for investment, but grades were assigned largely on the neighborhood’s racial

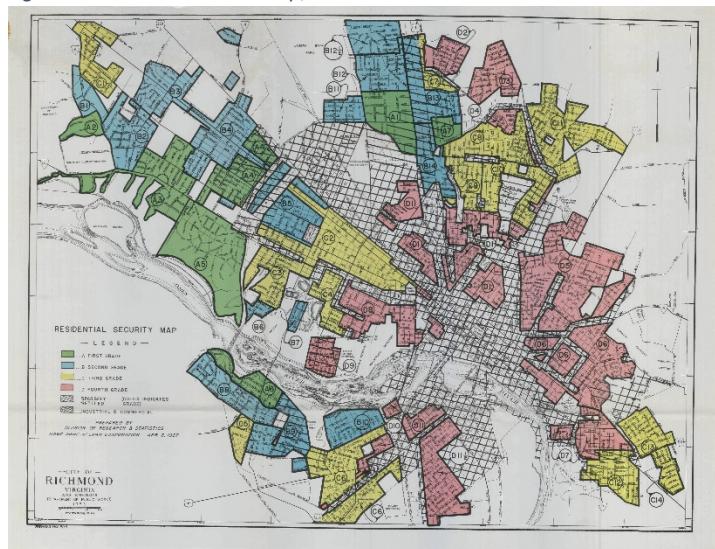
composition. In the Richmond, as elsewhere, African American neighborhoods were assigned the lowest of the four grades and designated in red on the maps. Richmond’ HOLC map is shown in Figure 1. Not coincidentally, the neighborhoods that received the highest grade, designated in green, were exclusively white. Race was such an important characteristic in the classification system that predominantly white neighborhoods with any signs of African American in-migration were described as becoming “infiltrated” and given a lower grade. The term “redlining” allegedly stems from the HOLC maps’ red lines designating African American neighborhoods.

Lenders and private insurers adopted HOLC’s standards. Credit – an essential element of the housing market – dried up in redlined neighborhoods. When credit was extended through mortgages or insurance, it was done so with exorbitantly high rates that reflected the perceived risks – risks based almost entirely on the presence of African American households.

In Richmond, the two lowest grades, red and yellow, were given primarily to neighborhoods in the East End. Neighborhoods with the two highest grades, blue and green, are found predominantly in the West End. This pattern exists today not as “residential security” for investment purposes but as residential insecurity in terms of disparate concentrations of race, wealth, and poverty.

During the same time, the Wagner-Steagall Act of 1937 laid the groundwork for modern public housing by subsidizing local public housing authorities in an effort to improve living conditions for the poor. The Housing Act of 1949 created the necessary financial incentives for inner city slum clearance under the auspices of urban renewal. The act financed the construction of public housing units, which eventually came to be known popularly as “the projects.” The overwhelming majority of public housing in the city was constructed in the lowest grade neighborhoods as designated by HOLC. Several years later, income

Figure 1: Richmond HOLC Map, 1937



<sup>1</sup> Federal Housing Administration, *Underwriting Manual: Underwriting and Valuation Procedure Under Title II of the National Housing Act With Revisions to April 1, 1936* (Washington, D.C.), Part II, Section 2, Rating of Location.

restrictions on all but guaranteed that the newly constructed units concentrated the poorest of the city's residents in only a few communities.

Homes in the neighborhoods surrounding these concentrations lost value and became some of the only ownership opportunities for city residents with the most difficulty obtaining credit: households with low incomes and African Americans of all incomes. Over time, as the neighborhoods continued to suffer from disinvestment, they developed into broad clusters of African American communities facing the bulk of the city's poverty and dwindling resources.

Around the same time that urban renewal was changing the face of the city, the federal government authorized millions of dollars to create the federal highway system through the Federal Aid Highway Act of 1956. The impact of highway construction on the region was twofold: it destroyed vibrant, healthy African American communities in the city, and it opened vast swaths of inexpensive property to development sprawling outward from the city. Jackson Ward, one of the wealthiest African American communities in the country, was effectively destroyed with the creation of the Richmond-Petersburg Turnpike. The highway split the neighborhood in two, displacing thousands of African American residents, many of whom were directed into public housing. Simultaneously, suburban development boomed along the new highways. City residents with the finances and ability to access credit – primarily white residents – could take advantage of new wealth building opportunities and join a growing, prosperous middle class.

It is important to note that de jure discrimination fueled the rise of the suburban, white middle class as well. The Servicemen's Readjustment Act (G.I. Bill) provided WWII veterans with access to credit that could be used to purchase a home, pursue higher education or vocational training, or start a business. From 1944-1971 it is estimated that \$95 billion went to veterans. 11 million home mortgages were made during this time. However, since the Veteran's Administration was allowed to adopt the discriminatory underwriting guidelines of the FHA, less than 2% of these mortgages went to black veterans.

The last policy of note was the result of *Brown v. Board of Education* which, in 1954, declared the practice of sending African American and white students to separate public schools unconstitutional. In Virginia, the Byrd Organization, a political machine led by former Governor and U.S. Senator Harry Byrd, obstructed integration for decades. Byrd's policy of Massive Resistance was characterized by the opening of private segregation academies for white families who refused to send their children to integrated schools. The mass outmigration of white families from the city – white flight – became increasingly evident. The noticeably changing racial composition of the city spurred greater numbers of white families to relocate from the city to neighboring counties. This pattern perpetuated itself for much of the second half of the 20th century.

Such overtly discriminatory public policies and programs rarely exist today, but the effects of those policies remain. Disparities in wealth, poverty, education, access to credit, employment opportunities, access to transportation, and other resources continue to fall along intertwined boundaries of race and neighborhood.

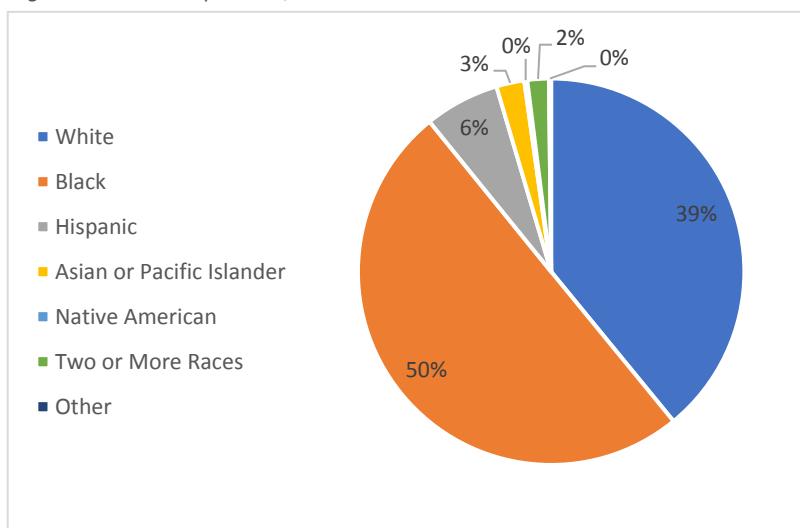
## **A. Demographic Analysis**

- 1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*
- 2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.*

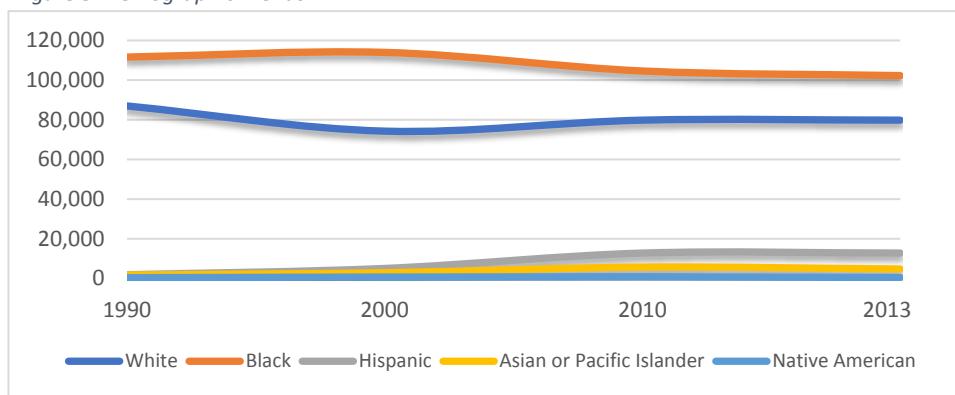
Figure 2 shows the current racial/ethnic composition of the city.<sup>2</sup> Richmond's total population is 50.08% black; 39.08% white; 6.27% Hispanic; 2.35% Asian or Pacific Islander, 0.25% Native American, 1.8% identify as two or more races, and 0.18% identify as some other race/ethnicity.

The most prominent demographic shift over the past 30 years has been the increase in racial/ethnic minorities. As Figure 3 shows, the Hispanic population has experienced a 587% rate of growth from 1,864 in 1990 to 12,803 currently; the Asian or Pacific Islander population has grown 179% from 1,710 to 4,772; and the Native American population, though small, grew by 25% from 411 to 514. The two largest racial groups both experienced 8% contractions; the white population declined from 86,974 in 1990 to 79,813 currently, while the Black population declined from 111,609 to 102,264. Overall, the total population of the city has shown gradual increases over the past several years and currently stands at 204,214.

*Figure 2: Current Population; 2009 -2013 5-Year Estimates*



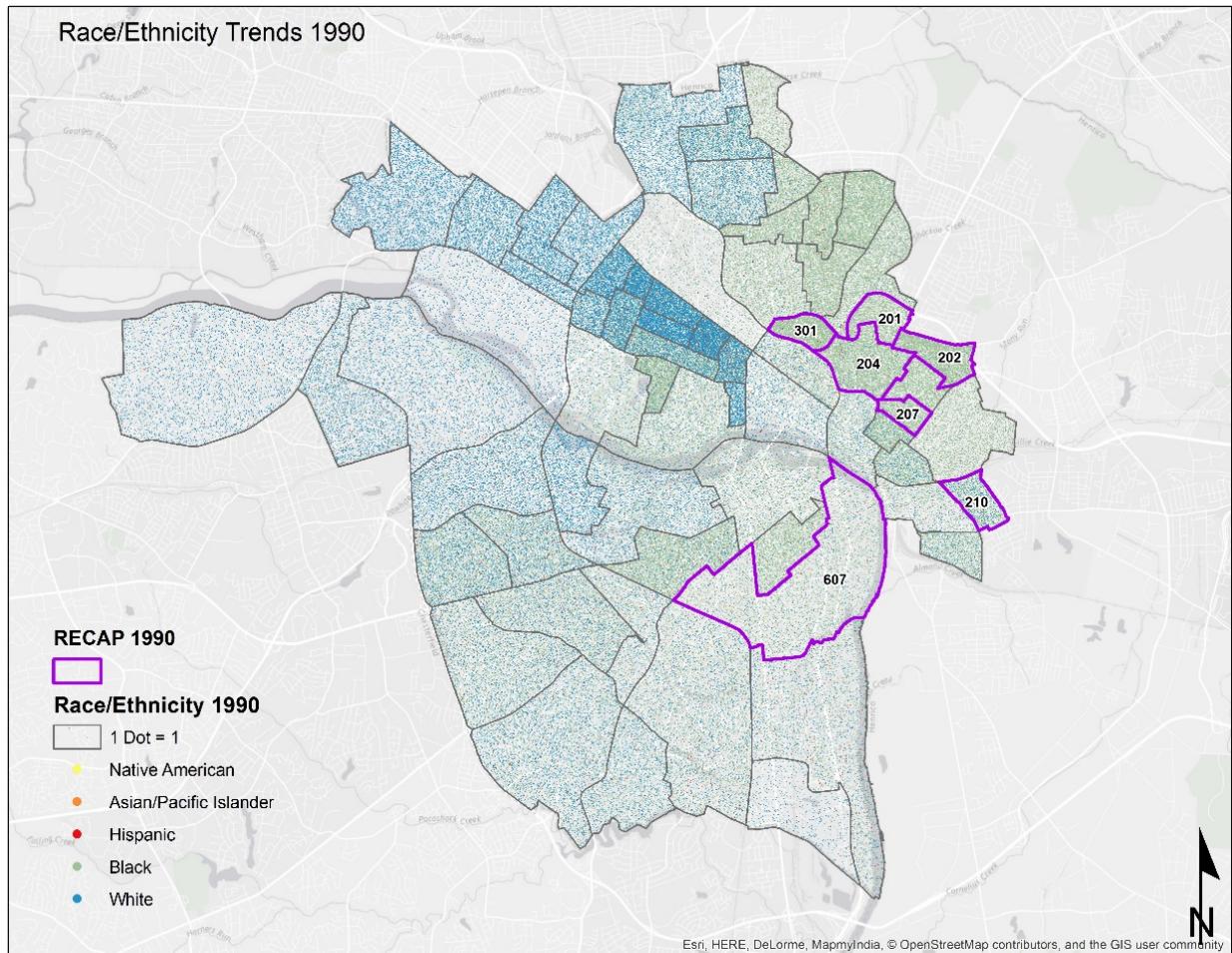
*Figure 3: Demographic Trends*



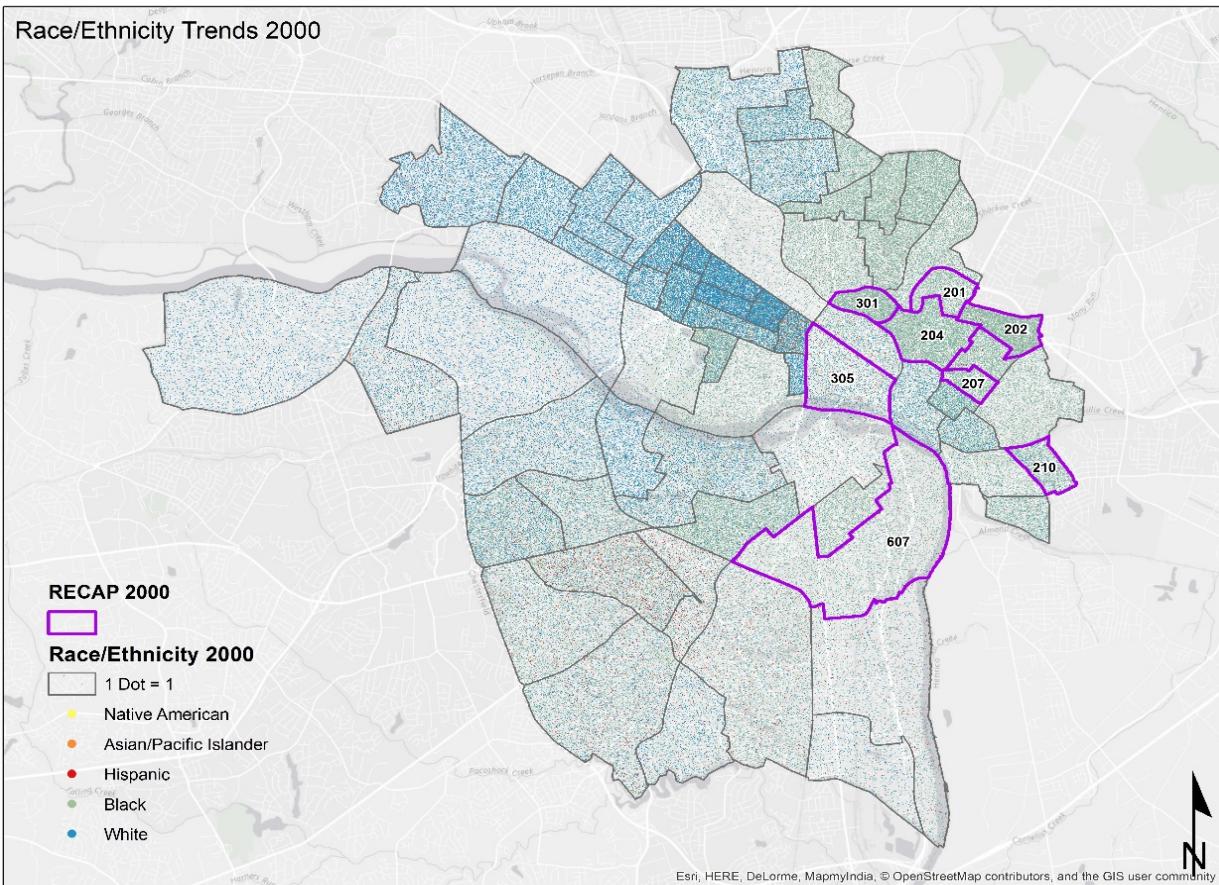
<sup>2</sup> AFFHT0003 Table 1: Demographics

The following series of maps (Maps 1-4) show the population by race/ethnicity in the City from 1990, 2000, 2010, and the most current available data. These maps clearly show the spatial correlation to the demographic trends examined previously. Of note is the visibly entrenched segregation of the black and white populations, the growth of the Hispanic population in the southern part of the city, and the shift in racial prominence in the Church Hill area from black to white. The census tracts outlined purple are those that are designated as racial or ethnic concentrated areas of poverty.

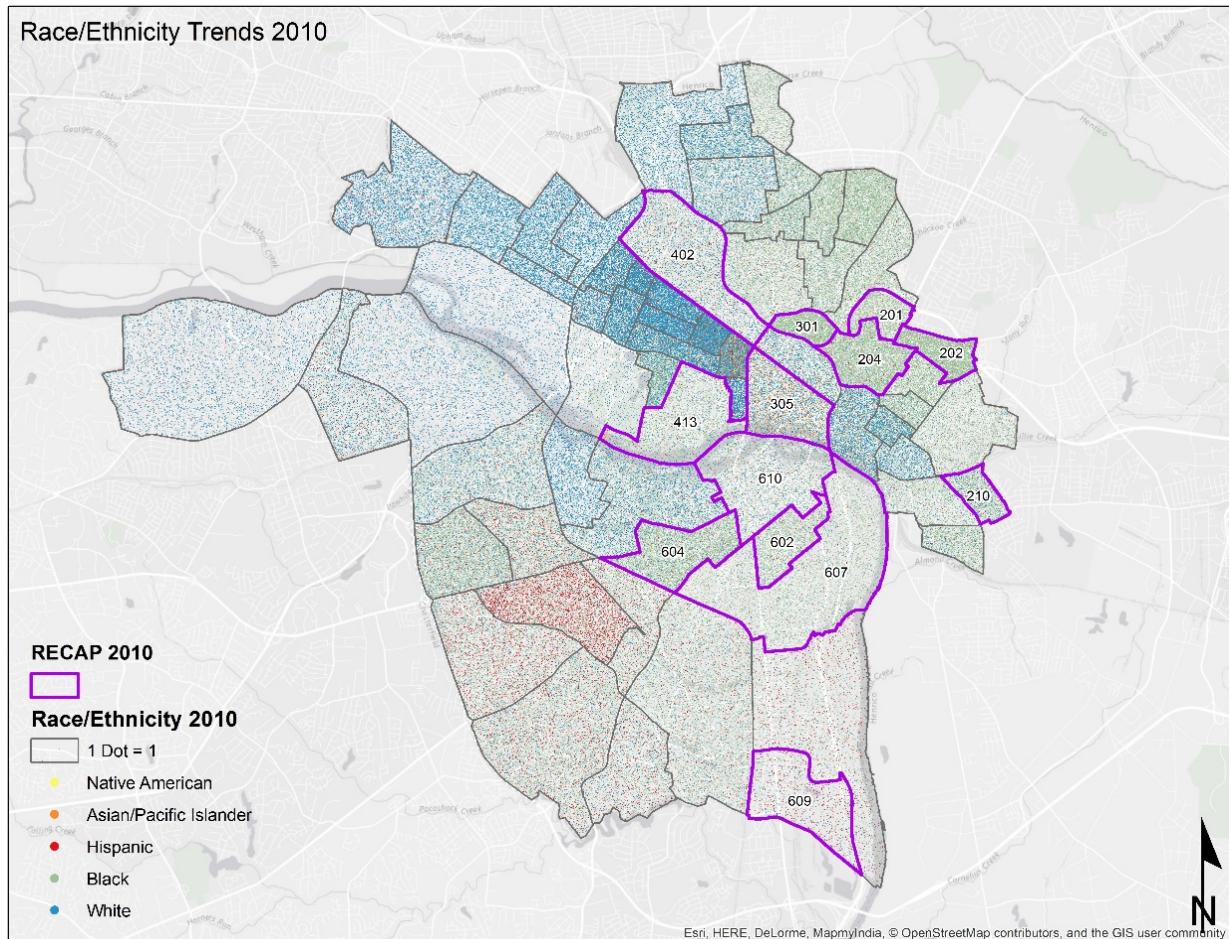
*Map 1: Race/Ethnicity 1990; 1990 U.S. Census*



Map 2: Race/Ethnicity 2000; 2000 U.S. Census



Map 3: Race/Ethnicity 2010; 2010 U.S. Census



Map 4: Race/Ethnicity Current; 2011-2015 ACS 5-Year Estimates

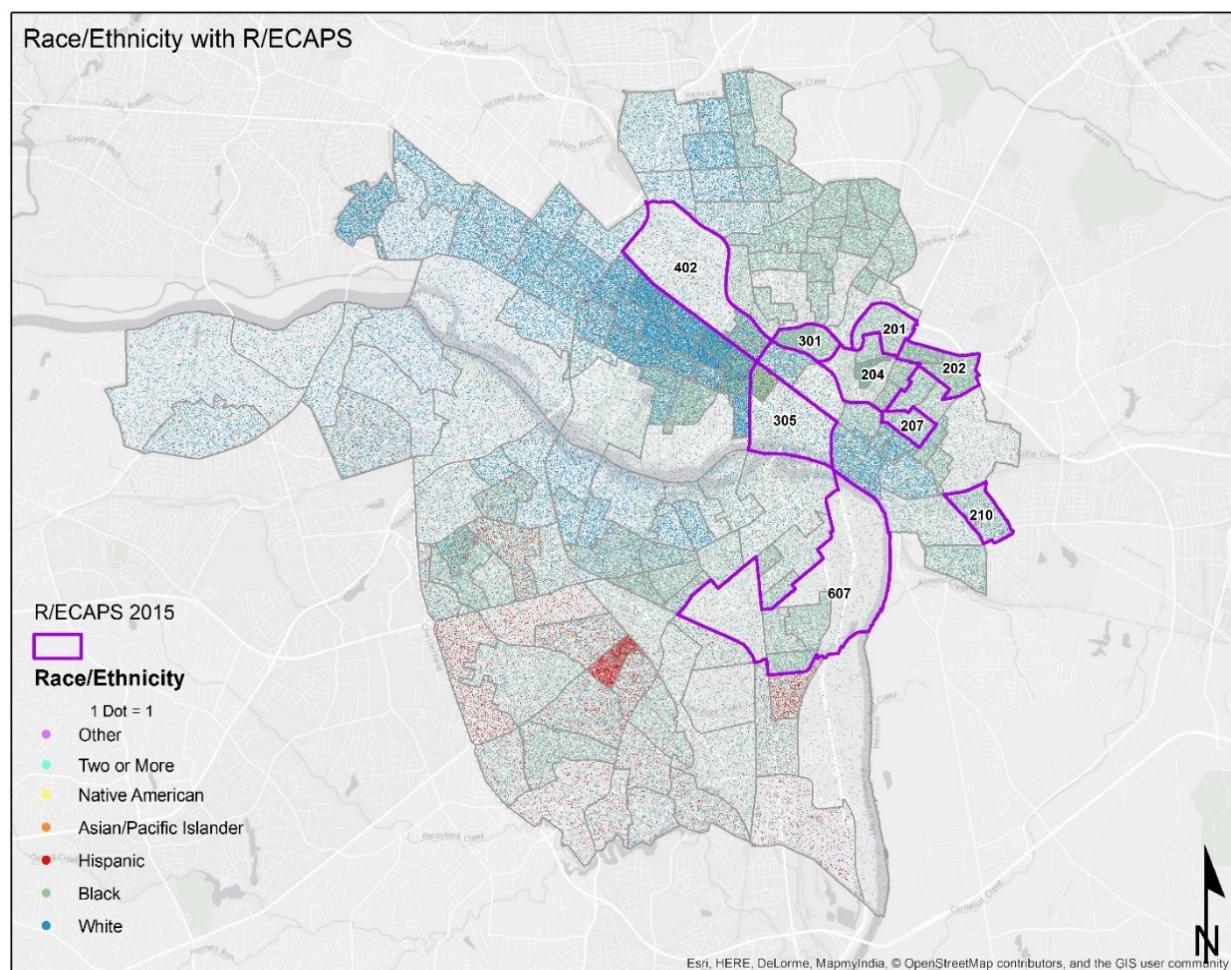
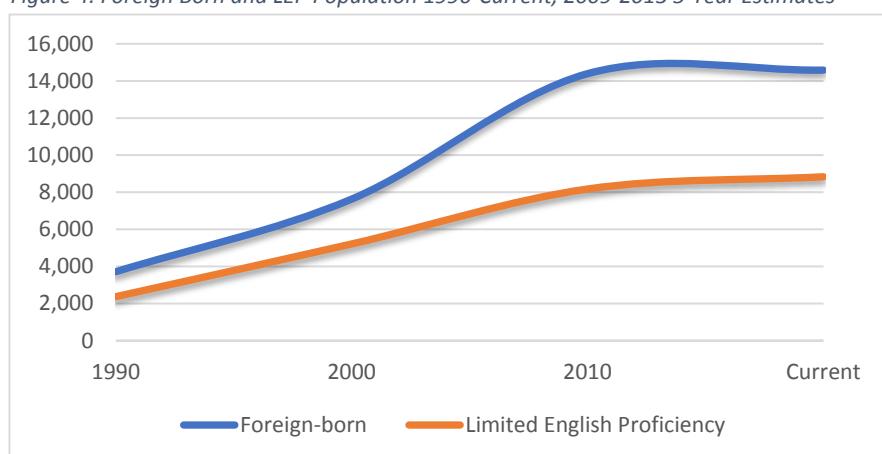


Figure 4 shows the increase in total population of the foreign born and limited English proficiency populations. The foreign-born population has increased by 292% from 3,716 in 1990 to 14,582 currently. Likewise, the number of individuals with limited English proficiency increased 272% from 2,372 to 8,834 during the same time.<sup>3</sup>

Figure 4: Foreign Born and LEP Population 1990-Current; 2009-2013 5-Year Estimates



<sup>3</sup> Ibid.

The total foreign-born population of the city is 14,582 or 7.1% of the total population. Figure 5 shows the ten most common countries from which current resident's hail from. Combined, residents from these ten countries account for 59% of the total foreign-born population.

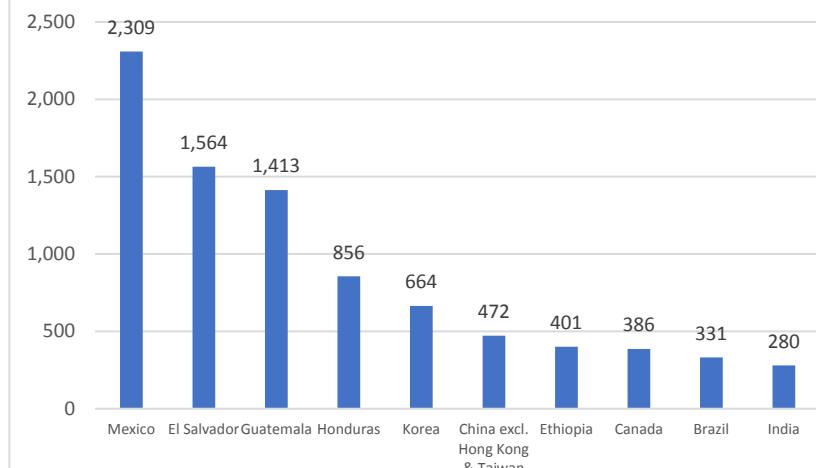
Just two countries account for more than ten percent or more of the total foreign-born

population. Residents from Mexico represent the largest share of the foreign-born population at 15.8% and Salvadorans account for 10.7%. Taken together, residents from Central American countries account for 42.1% of the total foreign-born population.

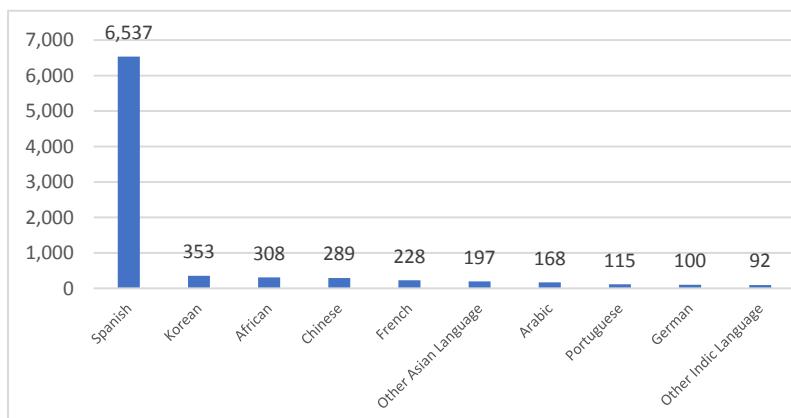
In total, 8,834 residents have Limited English Proficiency (LEP) though are fluent in some other language. Figure 6 shows the ten most common languages spoken by LEP residents. Spanish is the most commonly spoken native language for LEP individuals; 74% of the City's LEP population speak Spanish. The next most commonly spoken language is Korean, comprising just 4% of the total LEP population. The remaining eight most common languages account for 16.9% of the LEP population.

Figure 7 shows the male/female population has remained relatively stable over the past several decades. The female population has declined 3% from 110,294 in 1990 to 106,883 currently; the male population grew 5% from 92,534 to 97,331.

*Figure 5: National Origin - Ten Most Populous Countries; 2009-2013 5-Year Estimates*



*Figure 6: Limited English - Ten Most Common Languages; 2009-2013 5-Year Estimates*



*Figure 7: Sex Trends 1990-Current*

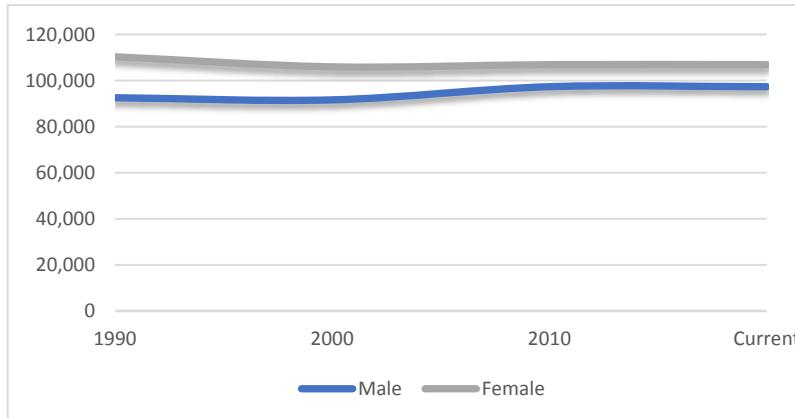
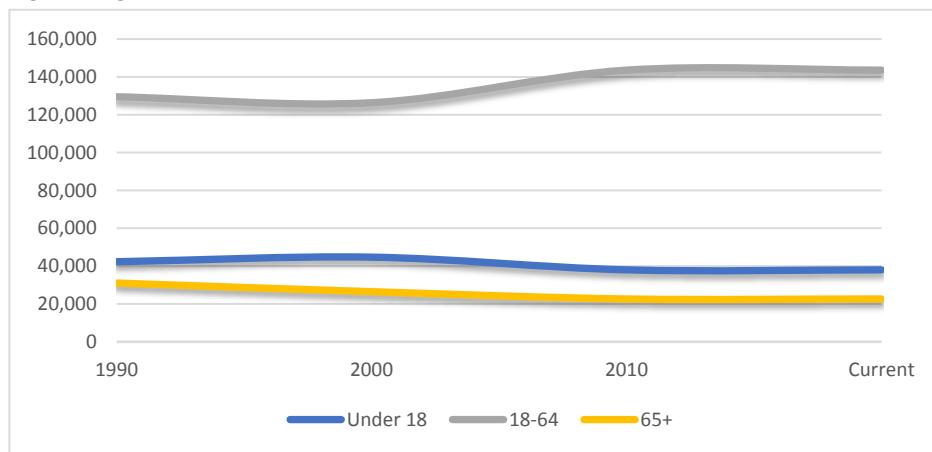


Figure 8 shows the change in relatively large age cohorts over the past several decades. The city has experienced a decrease in both the elderly (those 65 and older) as well as children (those under 18). The population under 18 declined 10% from 42,304 in 1990 to 38,009

*Figure 8: Age Trends 1990-Current.*

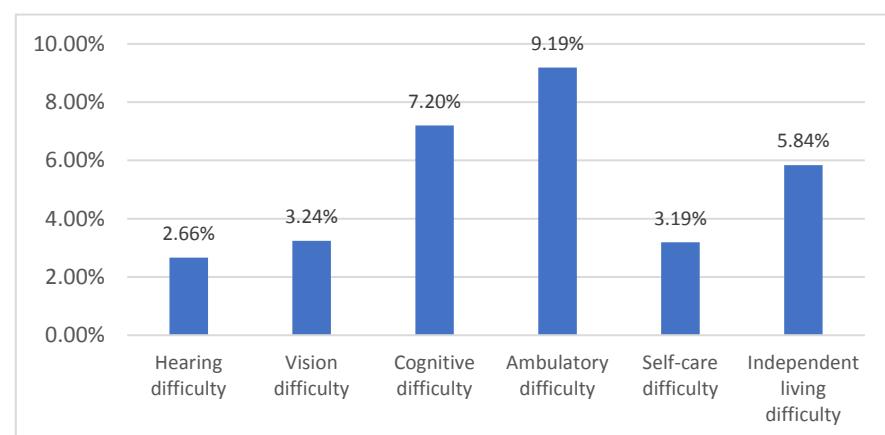


currently; the 65 and older population declined 27% from 31,028 to 22,619 over the same period. This trend is indicative of several things namely, that much of the population increase the city has experienced in recent years has come from younger, working age individuals

The term “disability” covers a broad spectrum of conditions. State and federal fair housing laws define disability as a physical or mental impairment that substantially limits a major life function, a history of having had such a condition, or the perception that one has such a condition. Alcoholics, persons with AIDS, and recovering substance abusers are covered by the law, but it does not include current users of illegal drugs.

In total, 31,513 residents have a disability. Figure 9 shows the percentage of the total population with a disability by individual disability type. It should be noted that residents may have more than one type of disability, thus the rates below represent the percentage of all disabilities in aggregate. Ambulatory

*Figure 9: Disability Type; 2009-2013 5-Year Estimates*



difficulty is the most common disability type; 9.19% of the population has ambulatory difficulty. Just over 7 percent of residents have a cognitive disability, and 5.84% of the population have difficulty living independently.

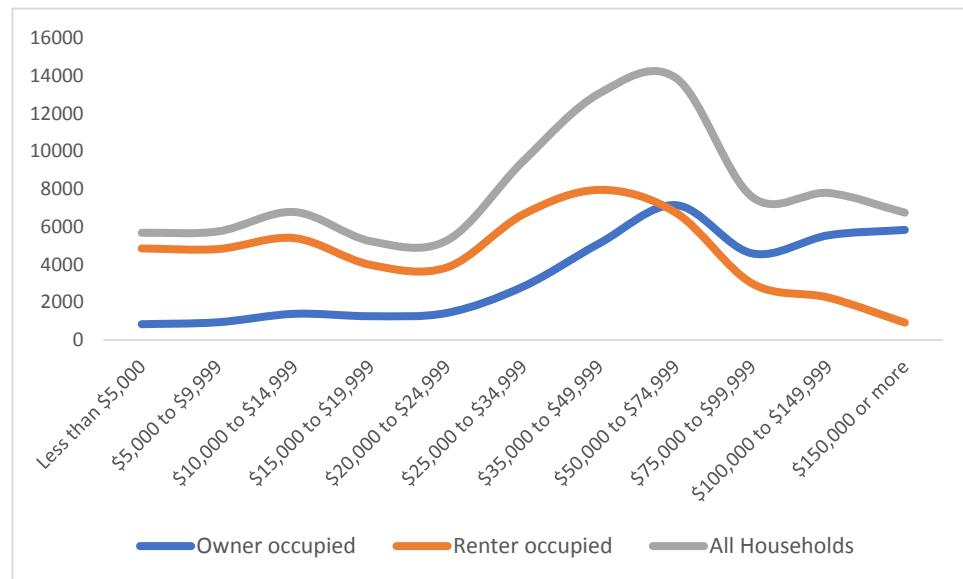
### ***Housing Tenure***

Owning a home has long been a part of the American dream. The equity in owning a home not only helps families pay for tuition costs, debt consolidation, and retirement, it also remains the primary way in which families build inter-generational wealth and social mobility. A recent study examining the growing wealth disparity between white and African-American families over a 25-year period found the

predominant factor to be the length of homeownership.<sup>4</sup> A report from the Joint Center on Housing Studies at Harvard University underscores this sentiment stating that "the true golden rule of how to accumulate wealth through homeownership - is whether ownership is sustained over the long term."<sup>5</sup> Although there are numerous variables that influence wealth accumulation such as household income, education, existing wealth, and inheritances, research has consistently shown that owning a home has a positive effect on wealth accumulation for both lower-income and minority households.<sup>6</sup>

Housing is the foundation of our society; little else plays such an influential role in shaping who we are and our life chances.<sup>7</sup> As such, housing is also the principal determinant of inequality influencing our access to opportunity. Homeownership has long been touted as an effective mechanism to build wealth for low-income and minority households. A higher share of Richmond's households rent housing than own. Currently, it is estimated that 58% of households rent their housing compared to 42% that own their housing.<sup>8</sup> The share of renters increased 3% from the estimates included in the 2013 AI which indicated that 55% of housing units were occupied by renter households.<sup>9</sup> These rates are nearly identical to 2015 ACS estimates and little

*Figure 10: Household Tenure and Income: Data Source: 2011-2015 American Community Survey 5-Year Estimates.*



changed from 2000 estimates that put the rental/ownership rate split at 54/46. Ownership estimates rose as high as 49% in 2008. This tenure balance is largely reflective of the distribution of income in the city, which is more heavily skewed toward the lower end of the income spectrum; 59% of households in the city have an income less than \$50,000. Figure 10 shows the correlation between income and tenure; specifically, the predominance of renter households at the lower end of the income spectrum and the

<sup>4</sup> Shapiro, Thomas, Meschede, Tatjana, Osoro, Sam. The Roots of the Widening Racial Wealth Gap: Explaining the Black-White Economic Divide. The Institute on Assets and Social Policy. Research and Policy Brief. February 2013.

<sup>5</sup> Herbert, Christopher E., MCue, Daniel T., Sanchez-Moyano, Rocio. Is Homeownership Still an Effective Means of Building Wealth for Low-Income and Minority Households? (Was it Ever?). Harvard University, Joint Center for Housing Studies, September 2013.

<sup>6</sup> Ibid.

<sup>7</sup> Powell, John a. and Cardwell, Kaloma. Homeownership, Wealth, & the Production of Racialized Space. Joint Center for Housing Studies, Harvard University. October, 2013.

<sup>8</sup> 2011-2015 American Community Survey 5-Year Estimates. Table B25003: Tenure.

<sup>9</sup> 2007-2011 American Community Survey 5-year Estimates.

increase of ownership among upper income households. The grey line represents the income distribution of all households.

*Figure 11: Tenure by Race/Ethnicity; 2011-2015 5 Year Estimates*

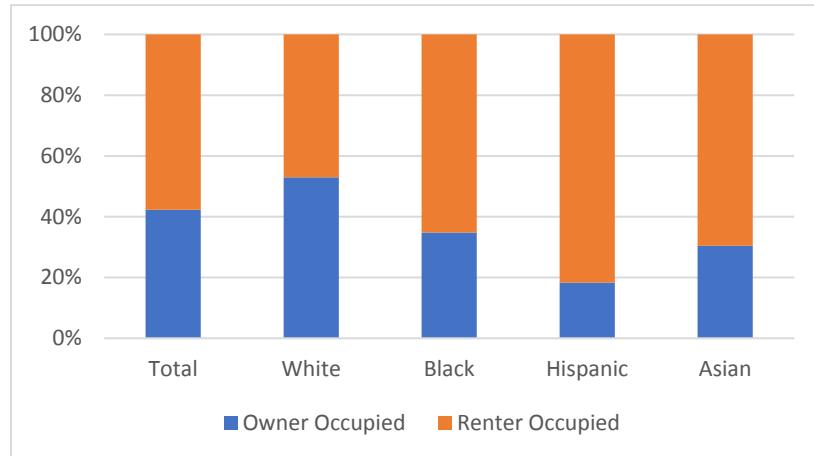
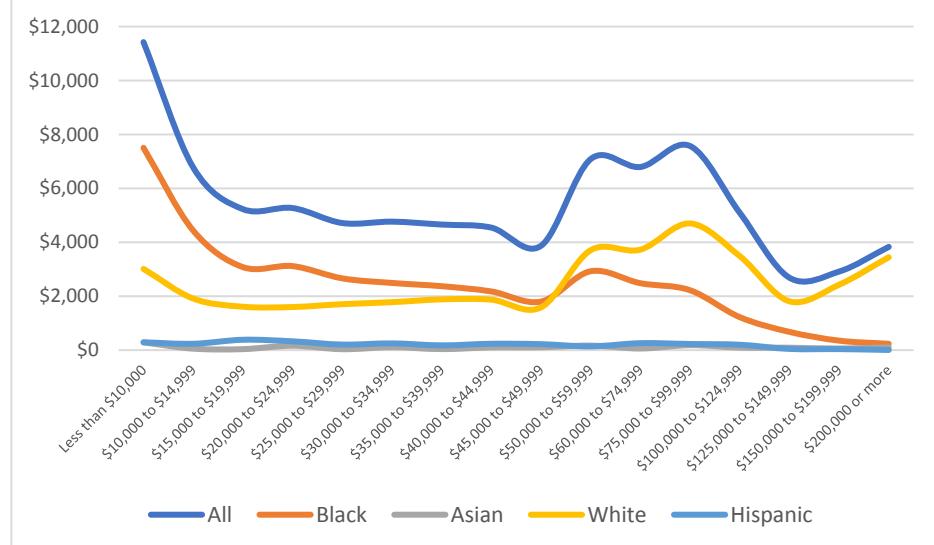


Figure 11 shows the tenure disparities among racial/ethnic groups. The overall homeownership rate in the city is 42%; the ownership rate for non-Hispanic white households is 53%; 35% for black households; 18% for Hispanic households; and 30% for Asian households.

Figure 12 shows the distribution of household income by race/ethnicity. In total, 11,424 or 13.1% of households earn less than \$10,000. Comparatively, 18.9% of black households and 16.9% of Asian households earn less than \$10,000; just 7.5% of white households earn less than \$10,000. Black households by far have the lowest income; 45.6% of black households earn less than \$24,999 compared to 20.2% of white households and 38.2% of Hispanic households. At the opposite end of the income spectrum, those households earning more than \$100,000, income disparities are even more pronounced; 16.7% of households earn more than \$100,000 compared to just 6.3% of Black and 8.9% of Hispanic households. 27.7% of white and 20.5% of Asian households earn more than \$100,000.

*Figure 12: Household Income by Race/Ethnicity; 2011-2015 5-Year Estimates*



## B. General Issues

### i. Segregation/Integration

#### 1. Analysis

- a. *Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*
- b. *Explain how these segregation levels have changed over time (since 1990).*
- c. *Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*
- d. *Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.*
- e. *Discuss how patterns of segregation have changed over time (since 1990).*
- f. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.*

The City of Richmond, like every city across the country, is a product of its past; shaped by politics, public policies and the public mindset. A significant portion of Richmond's past includes severe racial discrimination, the legacy of which the City is still working to overcome. The economic and residential patterns found in the city today serve as a reminder of these segregationist policies; policies rooted in the kinds of appalling, discriminatory policies and practices long-since prohibited by federal and state Civil Rights legislation. However, their effects are still evident upon the landscape of the city, emerging as persistent patterns of segregation that serve to divide resources available to different neighborhoods and differentiate the opportunities available to residents dependent upon their spatial location.

A standard measure of residential segregation is the dissimilarity index. The index is a measure of the evenness with which two groups are distributed across a larger geographic area. The index score can be described as the percentage of one of the two groups included in the calculation that would have to

Table 1 shows the dissimilarity index across the primary racial/ethnic groups. Dissimilarity index values range 0 to 100, with a value of

zero representing perfect integration between the groups in question; a value of 100 represents perfect segregation.<sup>10</sup> HUD considers a value less than

Table 1: Racial/Ethnic Dissimilarity Trends

Racial/Ethnic Dissimilarity Index	(Richmond, VA CDBG, HOME, ESG) Jurisdiction			
	1990	2000	2010	Current
Non-White/White	59.14	61.31	60.00	63.38
Black/White	60.51	63.41	63.49	66.73
Hispanic/White	29.77	50.96	60.76	62.26
Asian or Pacific Islander/White	33.65	34.00	38.81	44.48

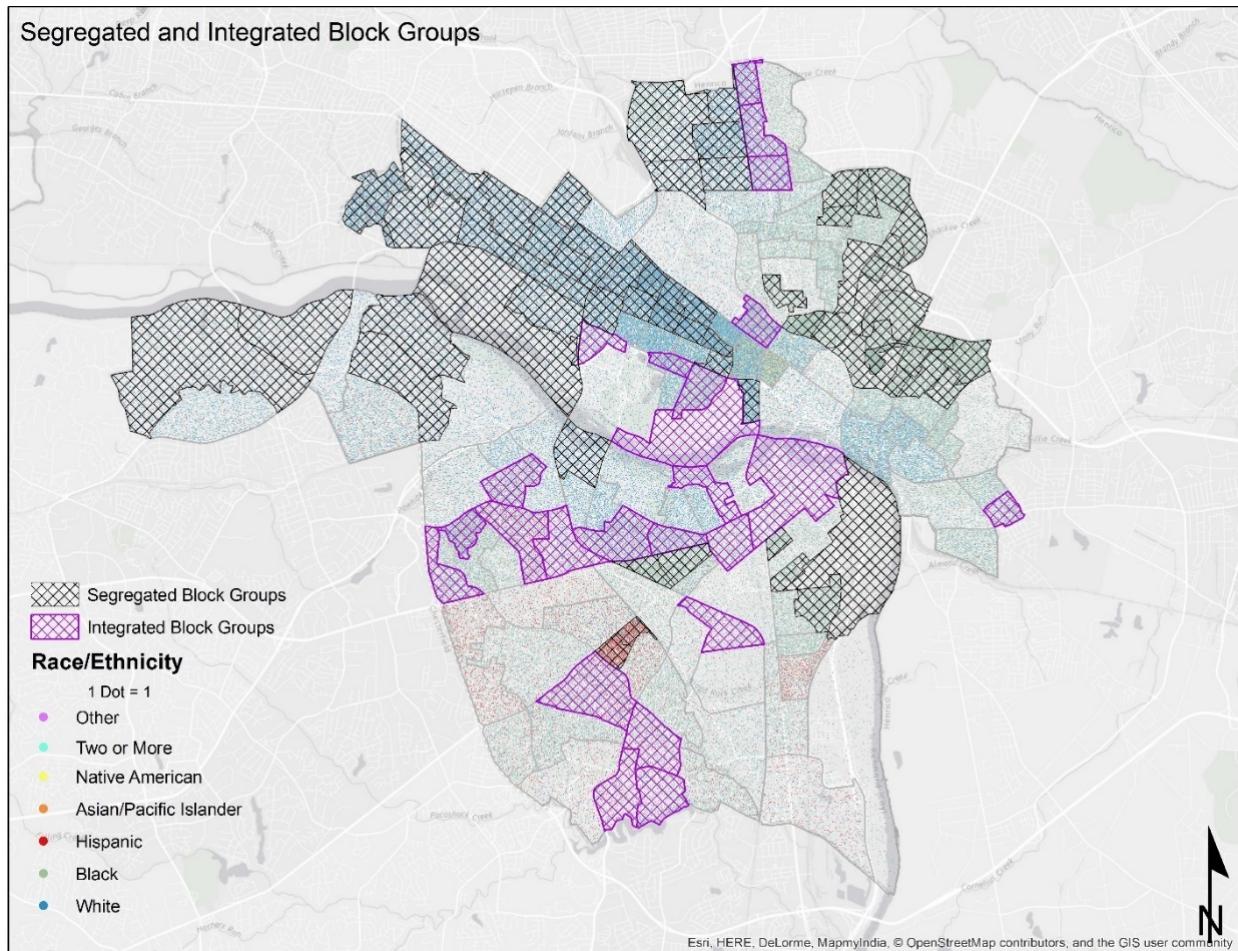
40 to be low segregation (yellow); value between 40 and 54 to be moderately segregated (orange); and a value of 55 or over to be highly segregated (red). As Table 1 shows there exists a high level of non-white/white segregation. This indicates an overall likelihood that the white population resides in locations isolated from the minority. This segregation has strengthened over the past several decades increasing 4.24 points from 59.14 in 1990 to 63.38 currently. The black and white population is the most segregated of any of the groups and is increasing; the dissimilarity value has increased 6.22 points from a value of 60.51 in 1990 to 66.73 currently. Asian or Pacific Islander/White segregation is the least

<sup>10</sup> HUD Office of Policy Development & Research. Affirmatively Furthering Fair Housing Tool (AFFH-T) Data Documentation. Data Version AFFHT0003. July 2017.

segregated pairing but has increased 10.83 points from 33.65 in 1990 to 44.48, moving it from low to moderate segregation according to HUD. The Hispanic/White dissimilarity index has grown significantly since 1990 from 29.77, indicating relatively little segregation, to 62.26 indicative of moderate segregation. Given the high rate of growth and relatively small number of Hispanic residents in 1990 (1,710 in 1990; currently 12,803 or 6.4 % of the city's population) this increase may be due in part to the limitations of the dissimilarity index; namely the small number of Hispanic residents in 1990 and the relatively diverse nature of the neighborhoods in which they currently reside.

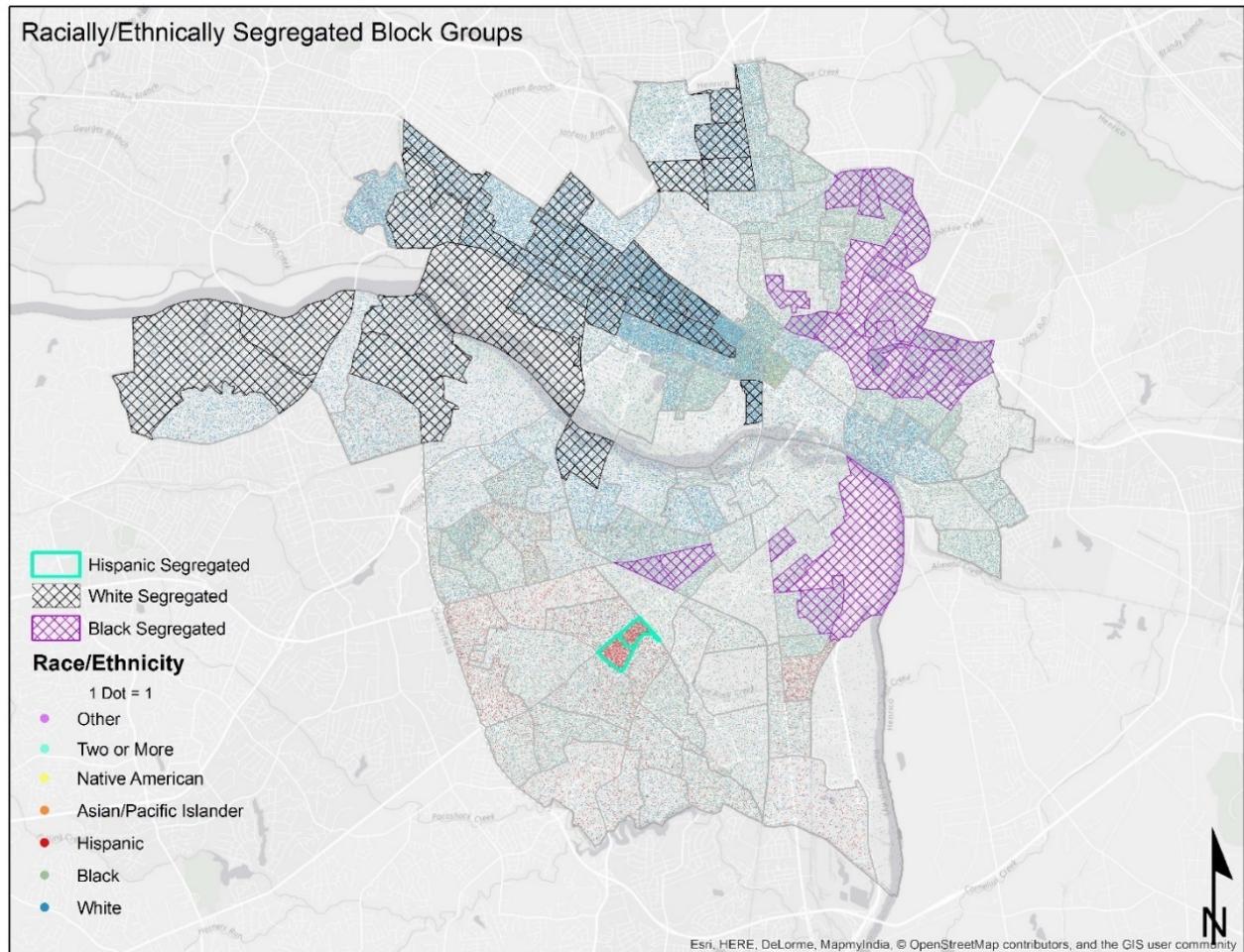
Map 5 shows racially and/or ethnically segregated and integrated neighborhoods in the city. The segregated areas are those in which the percentage of one of either the white, black, or Hispanic population is among the top 20% for that group and for which the population of one of the other two groups is within the bottom 20%. For example, block group X has a population that is 92.17% white (white population among the top 20% of all block groups) and a 3.57% black population (black population among the bottom 20% of block groups).

*Map 5: Segregation and Integration; 2011-2015 5-Year Estimates*



Map 6 shows segregated neighborhoods by race/ethnicity. The black cross-hatched areas are white segregated areas. The total population in these neighborhoods is approximately 40,000: 88.5% is white, 5.5% is black, and 2.4% is Hispanic. Conversely, the purple cross-hatched areas are those that are black segregated areas. The total population within these block groups is approximately 28,583: 93.6% is black, 3.2% is white, and 1.4% is Hispanic. The outlined areas are those that are segregated Hispanic areas. The total population in this area is approximately 2,693: 67.8% Hispanic, 29% black, and 2.5% white. This segregated Hispanic neighborhood is not nearly as hyper-segregated as the segregated black and white areas of the city.

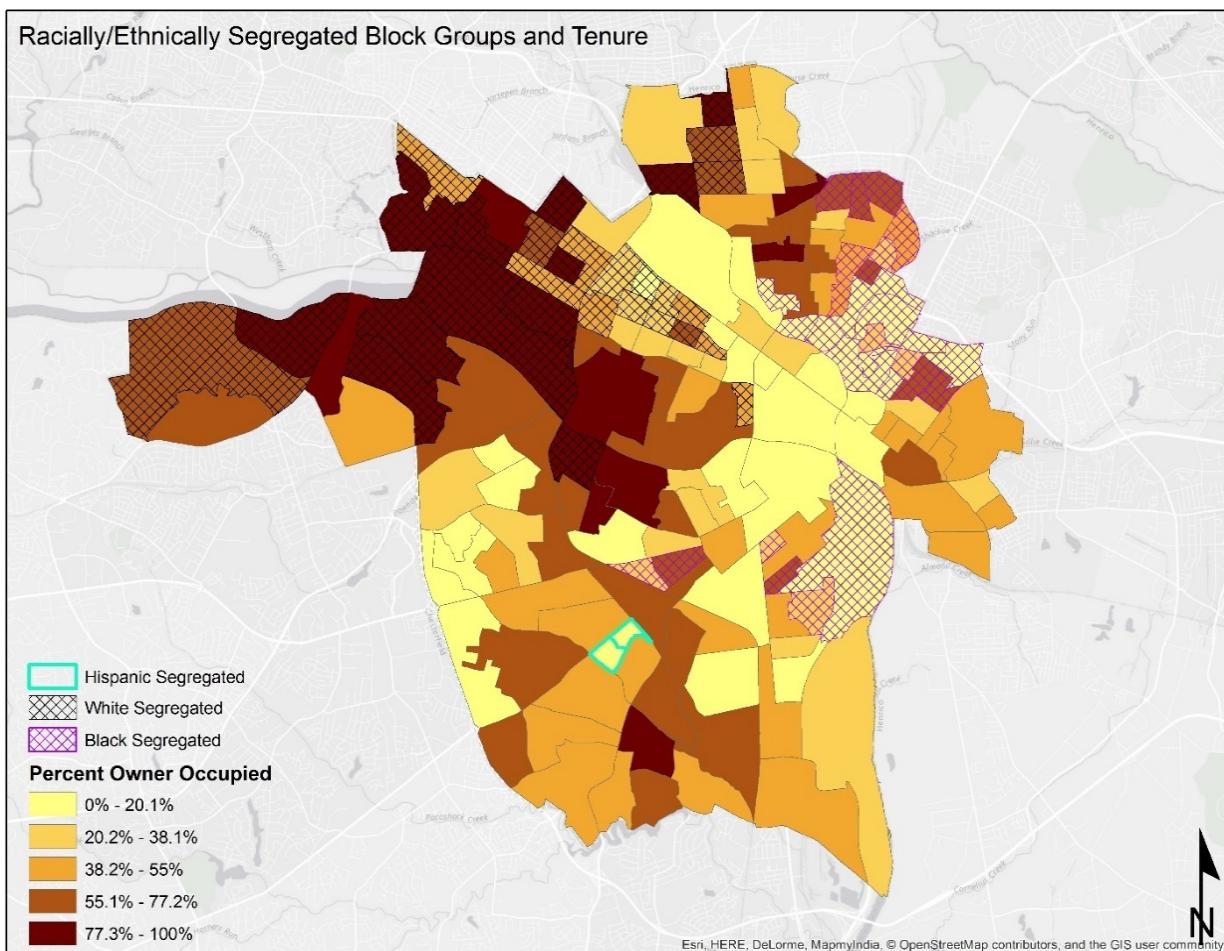
*Map 6: Racial/Ethnic Segregation; 2011-2015 5-Year Estimates*



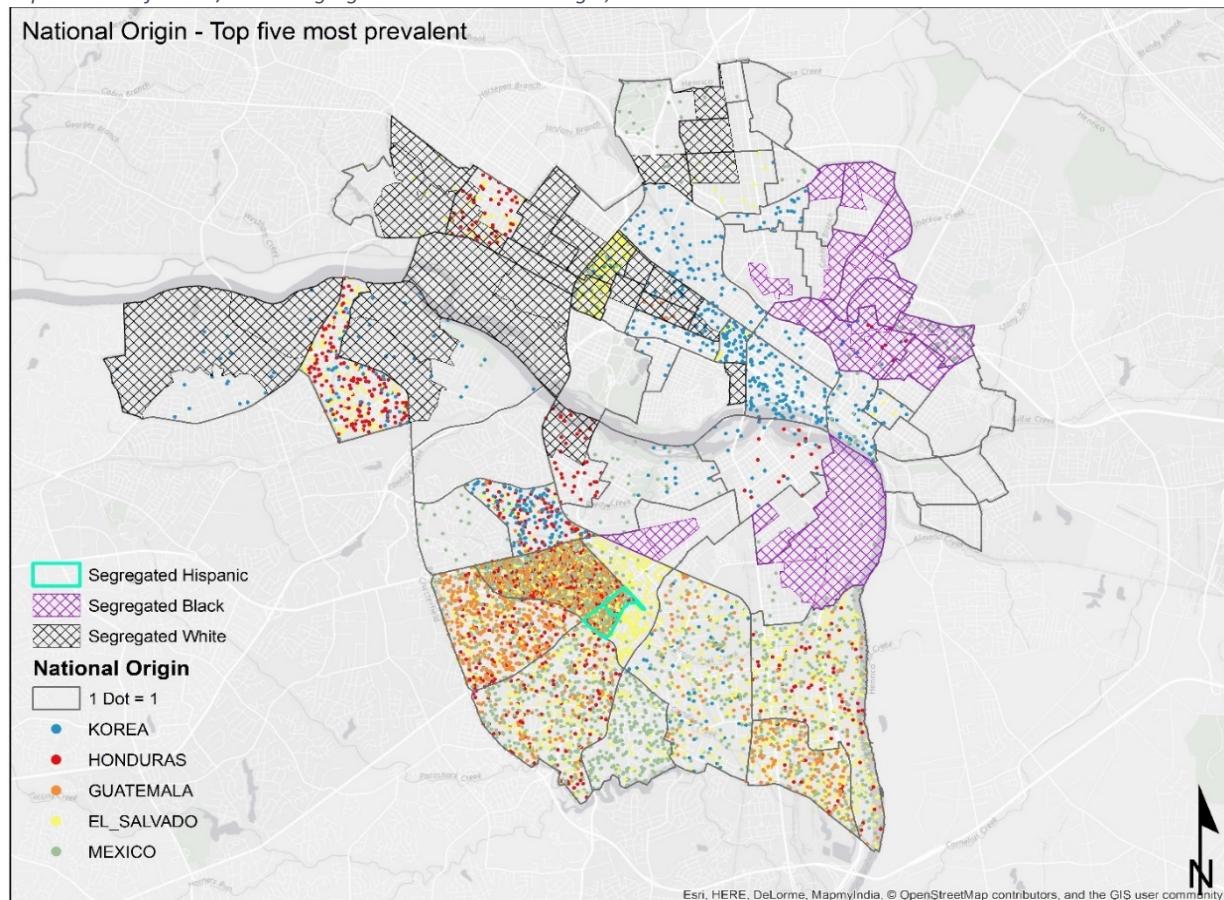
Map 7 shows the same racial/ethnically segregated areas as previously discussed and the percentage of owner-occupied households. The correlation between segregated white neighborhoods and homeownership is obvious; most areas with the highest rates of homeownership are also predominantly white. Segregated black and Hispanic neighborhoods have among the lowest rates of homeownership.

Map 8 shows the five most common countries of origin of Richmond residents. Most residents from these countries reside in areas that are not within segregated Black or white areas. Korean residents are

Map 7: Segregation and Percentage of Owner-Occupied Housing; 2011-2015 5-Year Estimates



Map 8: Areas of Racial/Ethnic Segregation and National Origin; 2011-2015 5-Year Estimates

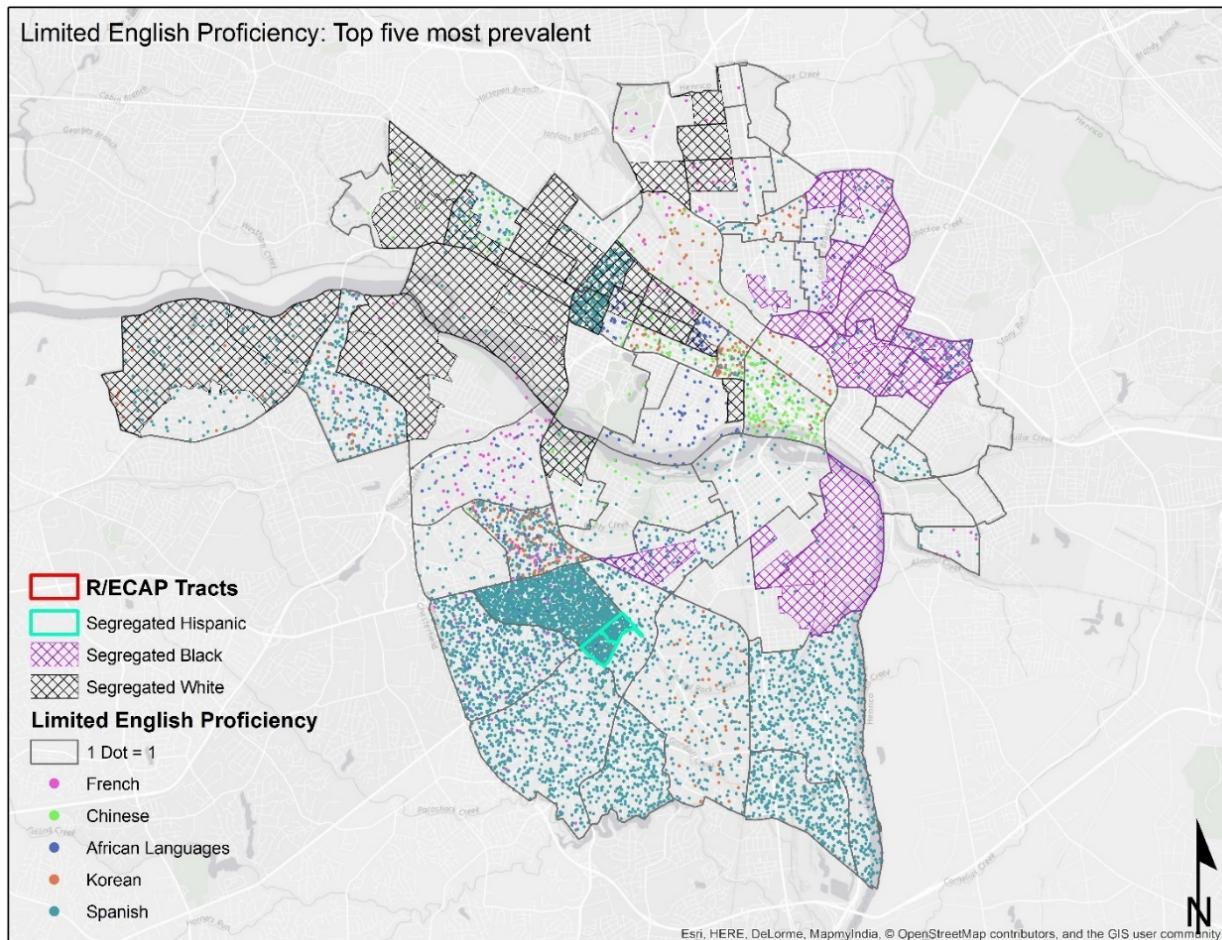


clustered in the central business district and neighborhoods surrounding Virginia Commonwealth University, while the overwhelming majority of those residents from Central America are relatively dispersed throughout the southernmost areas of the city with smaller populations concentrated in areas to the west of the central city. It is important to note that while these groups do not, for the most part, reside in the most segregated areas of the city, they appear to be geographically constrained. In conversations with community members, this spatial representation was not considered to be due to overt housing discrimination but rather due to social connections, community resources such as the quality of schools and ESL offerings, and the availability of affordable housing located in these areas.

There is a clear succession of housing choice and opportunity for new Latino immigrants as they assimilate into the broader Richmond community. The first and most affordable housing option is one of several trailer parks located off the Jefferson Davis Highway. Typically, after securing work and saving for a period, individuals and families can move to one of several apartment complexes that cater to Spanish speaking residents. The next progression for many Latino families is moving to Chesterfield County, in search of safer neighborhoods and better schools. However, many choose to remain within the city as the perception of police harassment is much higher in the neighboring counties.

Map 9 shows the top five most common languages spoken by those residents with limited English proficiency. Spanish is by far the most common; some 6,537 Spanish speaking residents are limited in their ability to speak English. By and large they reside in concentrated areas in the southern portion of the city and a few isolated block groups in the western portion of the city. This trend is nearly identical to the national origin map discussed previously. This concentration of limited English speaking residents from central America further serves to concentrate this growing community as shared language is a strong cultural and communal bond.

*Map 9: Segregated Areas and LEP; 2011-2015 5-Year Estimates*



## **2. Additional Information**

All relevant information, including additional information was addressed in the previous section.

## **3. Contributing Factors of Segregation**

**Contributing Factor:** Racial discrimination

**Prioritization:** High

**Justification:**

Segregation exists because government – federal, state, and local – has allowed it. Though many of the most egregious forms of discrimination have longed been outlawed, the government indirectly maintains segregation through other mechanisms such as disparate arrest, sentencing, and incarceration rates among black males, among others. The private market reinforces segregation through enforcing seemingly legitimate policies that nonetheless have discriminatory impact. For example, many property management companies impose residency requirements that severely constrain people with nearly any criminal history from gaining access to their properties. Thereby restricting choice and relegating individuals with criminal backgrounds to less desirable options which may be less safe, located in less stable neighborhoods or may, as is often the case, more expensive.

**Contributing Factor:** Public Investments in Specific Neighborhoods

**Prioritization:** Moderate

**Justification:**

The imbalanced approach to public investments over the past several decades, which rightfully targeted racially/ethnically disinvested communities, ultimately served to re-concentrate racial/ethnic poverty in the same neighborhoods.

**Contributing Factor:** Lack of Regional Cooperation

**Prioritization:** Moderate

**Justification:**

The Richmond Region has been remarkably constrained by the lack of regional cooperation. Much of this history is racialized: the annexation of a large swath of northern Chesterfield to retain white political power in the city in 1970, has hindered cooperation with our neighbors to the south. Henrico County has been reluctant to participate in regional public transportation efforts among others.

**Contributing Factor:** Lending Discrimination

**Prioritization:** Moderate

**Justification:**

Historic discriminatory practices reviewed at the beginning of the Fair Housing Analysis section briefly discussed the role that government-sanctioned mortgage lending played in preventing minority residents from partaking in the benefits of homeownership and subsequent wealth creation beginning in the 1930's and continuing through the present day. As evidence, a report commissioned by City of Richmond Councilwoman Ellen Robertson in 2015 to examine the mortgage lending behavior of the city's lending institutions found gross disparities in the lending outcomes between white and non-white borrowers in the City.

**Contributing Factor:** Location and Type of Affordable Housing

**Prioritization:** Moderate

**Justification:**

Based on the findings of key affordable housing reports over the past several years, there are numerous gaps in the affordable housing supply of the region. Most notably, there is severe downward pressure on the supply of affordable units (i.e., affordable rental units are being occupied by residents that could afford more and not be cost-burdened). Additionally, the City bears a disproportionate regional share of the affordable housing inventory. Of concern is that the suburban jurisdictions neighboring the city do not have adequate supple undeveloped land properly zoned to meet the projected demand for multifamily housing. As low-income households in the region are disproportionately minority, the location of affordable housing throughout the region ultimately serves to reinforce segregated living patterns.

**Contributing Factor:** Public education disparities reinforce residential segregation

**Prioritization:** High

**Justification:**

Richmond City Schools have long faced challenges including aging infrastructure, decreased federal and state funding, the allocation of which is regressively based on performance. High performing elementary school districts in the city correlate to neighborhoods with higher property values making them largely only accessible to middle and upper income households.

**Contributing Factor:** Lack of regional public transportation

**Prioritization:** Moderate

**Justification:**

GRTC's limited routes into the counties, where many employment opportunities exist, continues to impede the employment options for city (and county) residents. Though GRTC's Bus Rapid Transit (BRT) system represents the single largest public transportation investment in the city in decades and may very well become the foundation of a true regional public transit network, in and of itself, it does not resolve regionally limited job and housing opportunities.

**Contributing Factor:** Discrimination in the rental market

**Prioritization:** High

**Justification:**

Rental market testing conducted by HOME revealed disparate treatment favoring white home seekers. Discrimination serves to distort the housing market by limiting the options of protected class home seekers, resulting in them having to either pay for housing that may cause them to become housing cost burdened, or seek low-quality housing that may be less safe and have detrimental health implications.

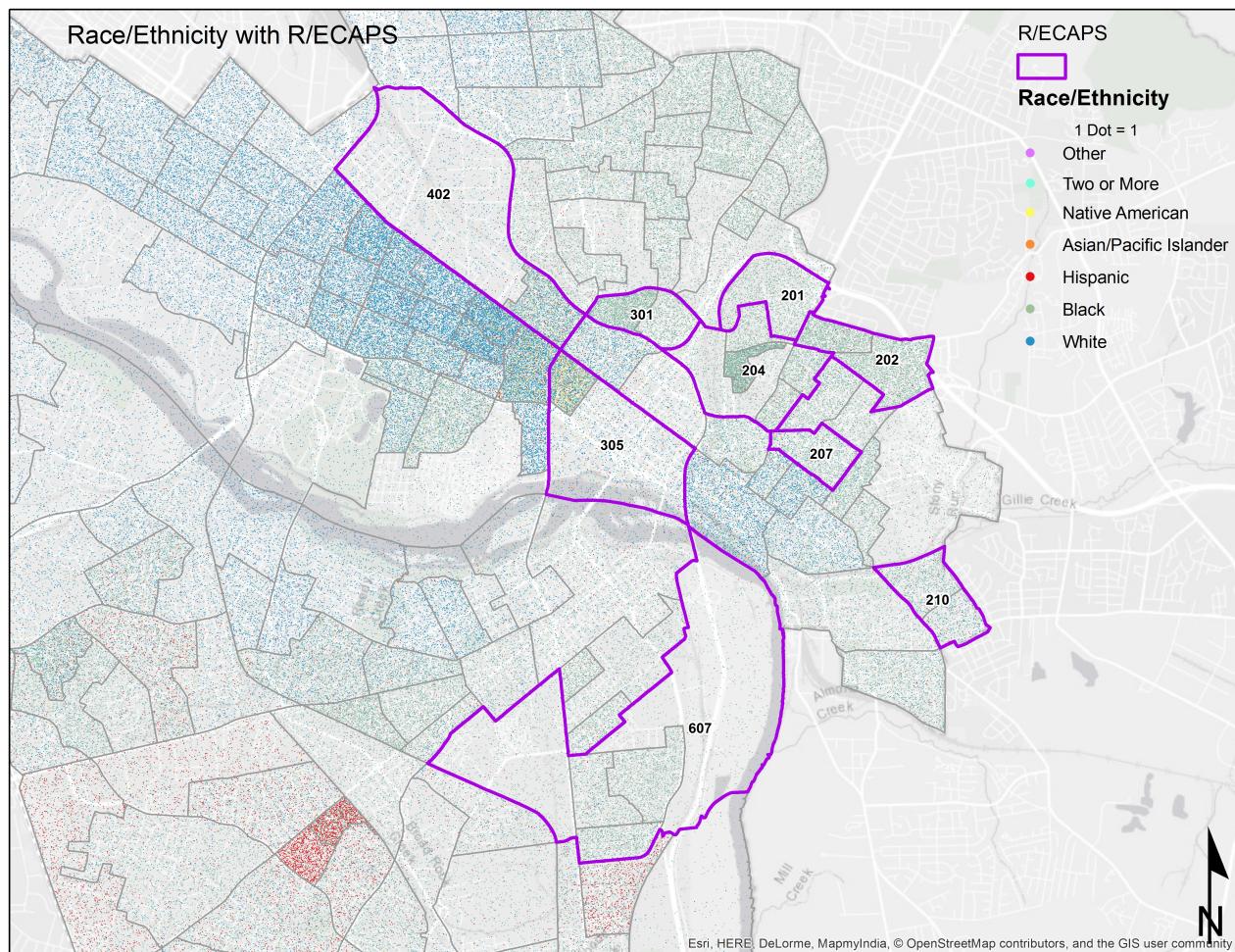
## **ii. R/ECAPs**

### **1. Analysis**

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.
- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

HUD defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as an area that has a non-white population of 50 percent or more and has a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever is lower.<sup>11</sup> In short, R/ECAPs highlight areas that suffer from both residential segregation and higher than normal poverty and should be a primary focus of fair housing planning efforts. Map 10 shows those areas that qualify as R/ECAPs. Census tracts 201, 202, 204, 301, and 207 represent a cluster of R/ECAPs in which the largest public housing developments are located.

Map 10: Race/Ethnicity and R/ECAPs



<sup>11</sup> U.S. Department of Housing and Urban Development, *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation*, Data Version AFFHT0003, July 2017, <<https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0003.pdf>>.

As evidenced by Map 10, Non-Hispanic Blacks are disproportionately over-represented in R/ECAPS throughout the city. Overall, they represent 50.08% of the total population yet account for 76.05% of the population within R/ECAPS. Non-Hispanic whites are disproportionately under-represented comprising 39.08% of the total population yet only account for 15.16% of the population within R/ECAPS. Hispanics are slightly under-represented accounting for 6.27% of the total population and 2.37% of the R/ECAP population. The Asian or Pacific Islander population is nearly equally represented accounting for 2.34% of the total population and 3.97% of the R/ECAP population.

Persons from other countries are disproportionately under-represented in R/ECAP tracts throughout the city.

Table 2 shows the 10 most common countries local residents are from, the number of them that reside within a R/ECAP, and the percentage of the R/ECAP population they constitute. Residents from Korea account for the largest number of the foreign-born R/ECAP population; residents from China and Cameroon are the 2<sup>nd</sup> and 3<sup>rd</sup> most common foreign-born residents residing in R/ECAPs accounting for .38% and .35% of the total R/ECAP population respectively.

*Table 2: National Origin R/ECAP Population; 2009-2013 5-Year Estimates*

R/ECAP National Origin	Total Population in R/ECAPs	29,151	-
Korea	180	0.62%	
China excl. Hong Kong & Taiwan	111	0.38%	
Cameroon	101	0.35%	
Bangladesh	93	0.32%	
Mexico	79	0.27%	
Belgium	55	0.19%	
England	50	0.17%	
Ethiopia	49	0.17%	
Taiwan	43	0.15%	
Bosnia & Herzegovina	38	0.13%	

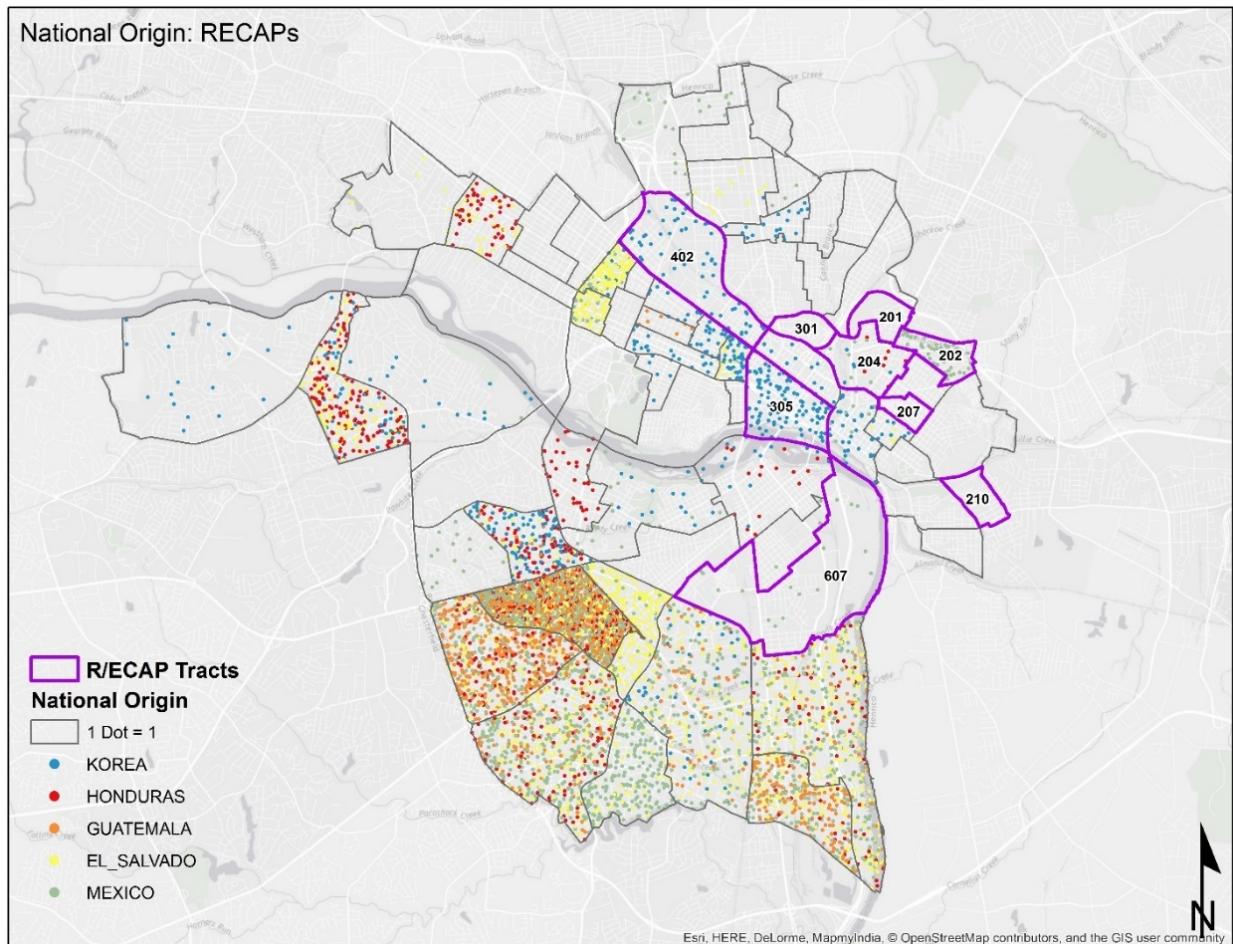
Interestingly, of the ten most common countries, only four are found within R/ECAP tracts: Korea, China, Mexico, and Ethiopia. 27% of the total Korean population resides in R/ECAPs, 23.5% of the Chinese population, 12.2% of the Ethiopian population, and 3.4% of the Mexican population reside in R/ECAPs. Of note is the under-representation of Spanish speaking residents residing in R/ECAPs given their total population in the city. Spanish speaking countries account for 6,142 of the city's total population yet account for only 79 persons (all from Mexico) living within R/ECAP tracts.

Map 11 shows the spatial distribution of residents from the five most common countries of the foreign-born population. Within the identified R/ECAP tracts, persons from Korea are most likely to live in census tracts 305 and 402 and those from Mexico are most likely to reside in census tract 202.

HUD does not provide data on the number of LEP individuals residing in R/ECAPs. However, Map 12 shows the spatial distribution of those LEP residents who speak one of the five most common languages. Though Spanish is the most commonly spoken language for LEP individuals, LEP Chinese speakers have the greatest number of LEP individuals residing in R/ECAPs; 146 LEP Chinese speakers reside in R/ECAPs compared to 129 LEP Spanish speakers, 59 LEP Korean speakers, and 33 LEP French speakers.

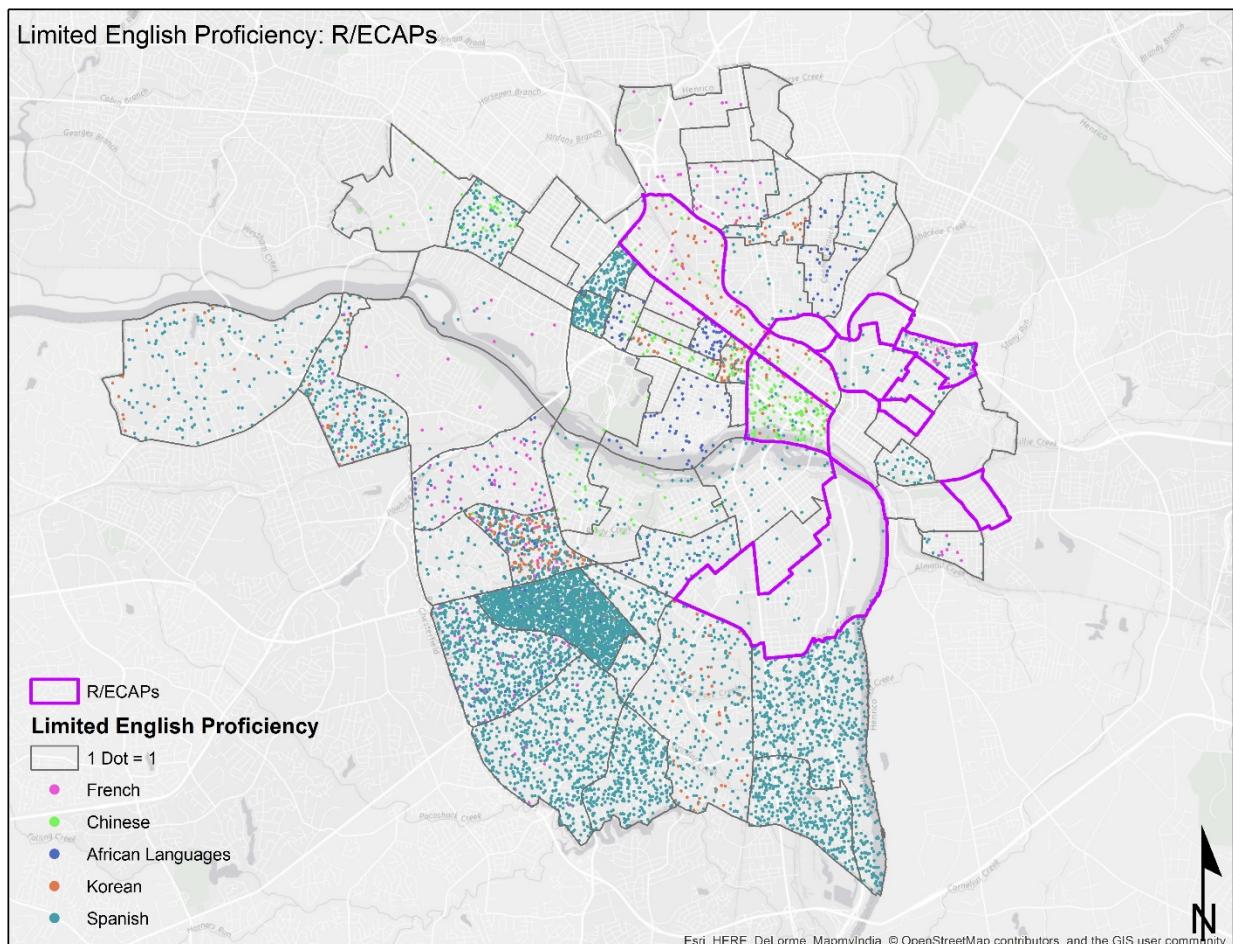
Map 11: National Origin and R/ECAPs; 2009-2013 5-Year Estimates

### National Origin: RECAPs



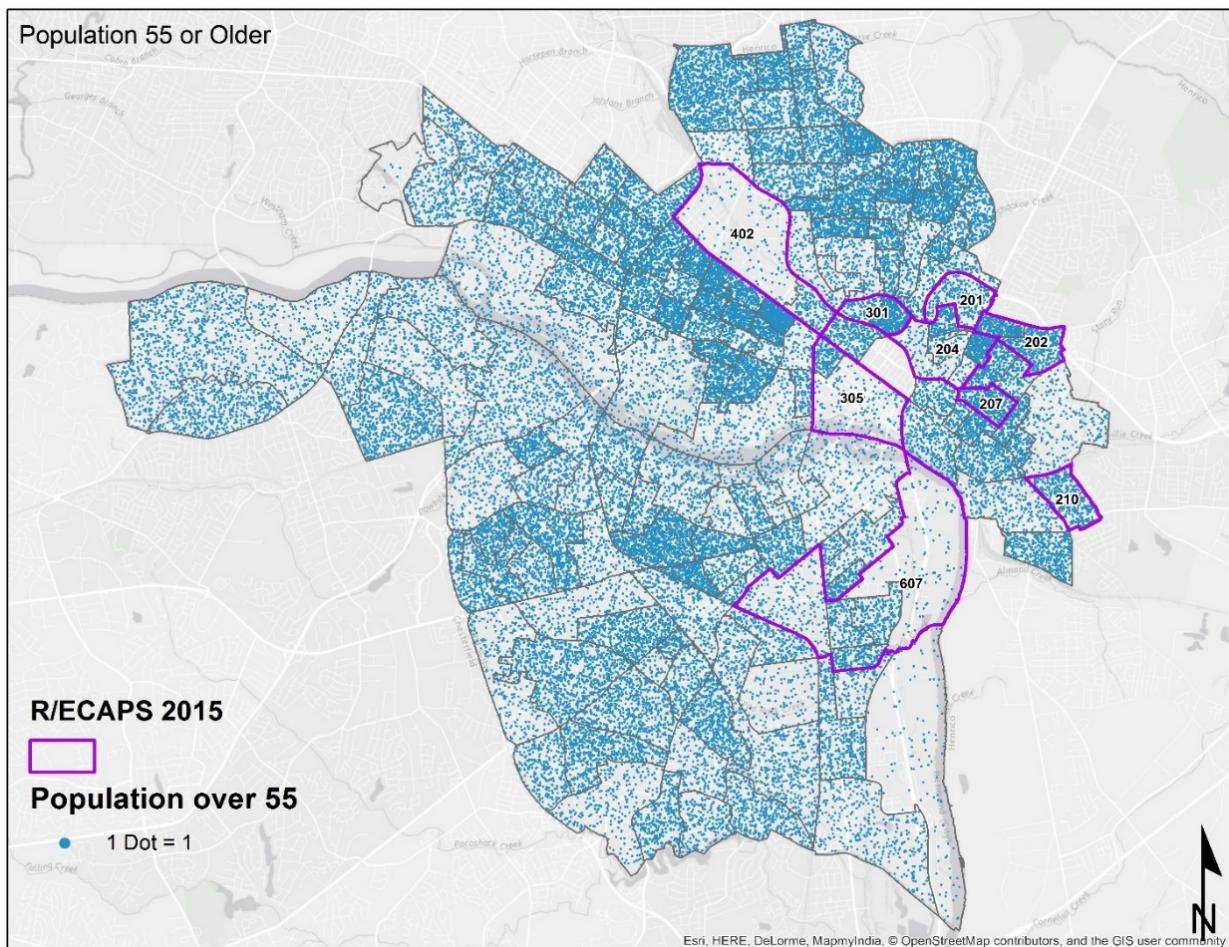
Map 12: LEP and R/ECAPs; 2009-2013 5-Year Estimates

### Limited English Proficiency: R/ECAPs



In Virginia, those aged 55 and older are explicitly protected under the State Fair Housing Act. Map 132 shows the distribution of residents aged 55 and older. Overall, this group represents 23.3% of the city's population. R/ECAP tracts with lower than average rates of residents aged 55 and older are tract 201 (13.7%), 202 (16.4%), 204 (14.5%), 301 (20.4%), 305 (10.6%), 402 (7.6%), and 607 (18.6%). Two R/ECAP tracts have slightly higher rates of residents aged 55 and older: tracts 207 (28.1%) and 210 (24.1%).

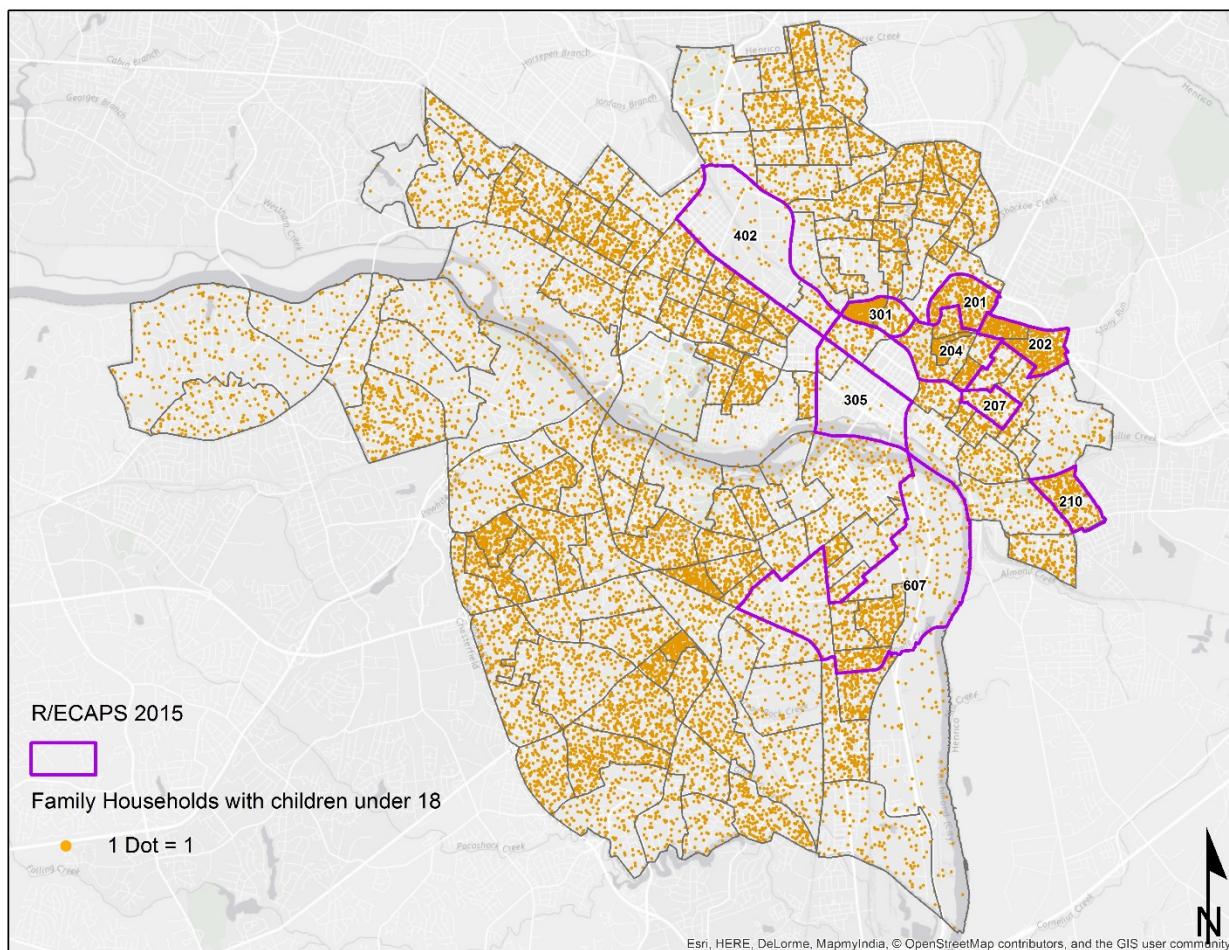
*Map 13: Population Aged 55 and Older and R/ECAPS; 2009-2013 5-Year Estimates*



Map 14 shows those households with children under 18 years of age. Approximately 42.3% of family households in the city have children under 18; within R/ECAPs, 58.44% of households have children.<sup>12</sup> Census Tract 305 which includes much of downtown has the lowest rate of family households with children at 14.9%. R/ECAPs that include public housing developments have the highest rates of family households with children: 80.3% of family households in tract 301 have children; 72.0% in tract 201; 65.5% in tract 202; and, 61.6% in tract 204. This trend is reflective of the prevalence of children living in public housing.

<sup>12</sup> Table 4 – R/ECAP Demographics

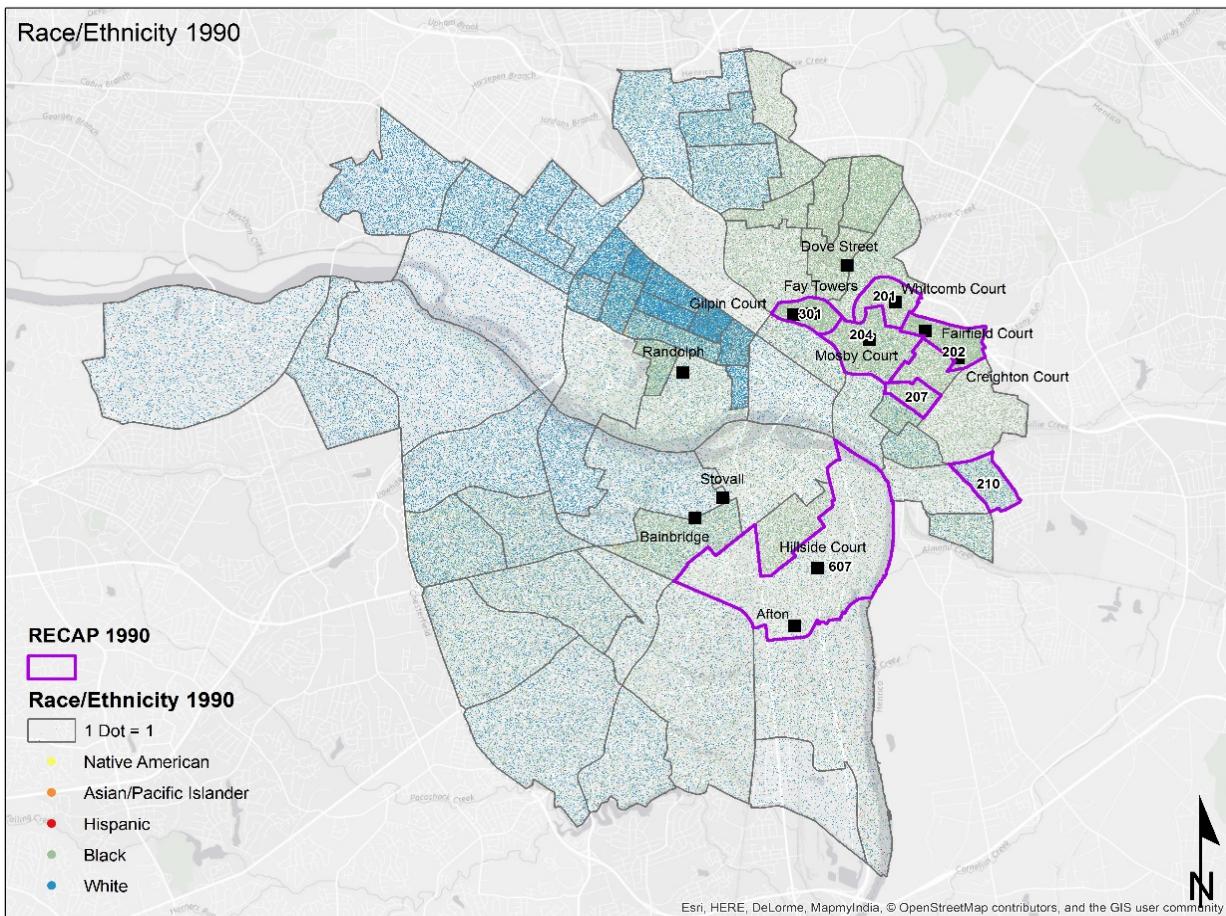
Map 14: Households with Children and R/ECAPs; 2009-2013 5-Year Estimates



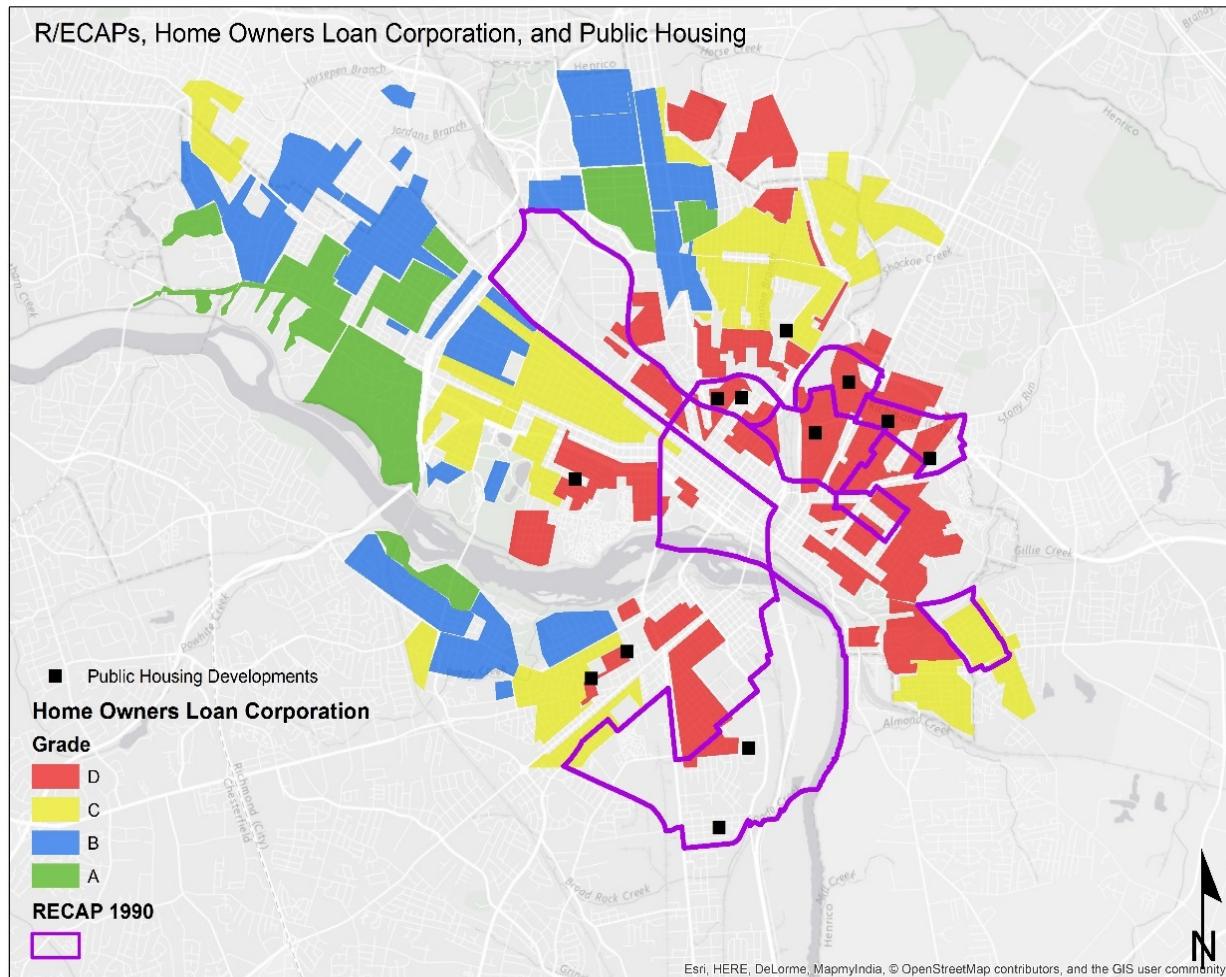
Of concern to the city's fair housing planning efforts is the growth of R/ECAPs over time. Map 15 shows the location of the city's public housing developments and the census tracts that qualified as R/ECAPs. These census tracts house the clear majority of the City's public housing developments and have long born the effects of overt housing discrimination.

The location of Richmond's public housing developments can be traced back to the Roosevelt Administration's "New Deal," which was a series of federal programs designed to stabilize and grow the economy in response to the Great Depression. Two programs of note – the Home Owner's Loan Corporation (HOLC) and Urban Renewal – served to establish and entrench racially segregated housing patterns in the city. Unfortunately, the HOLC used race as an indicator of credit risk which had the consequence of redlining black neighborhoods and Urban Renewal ushered in massive slum clearance and the construction of public housing developments. Though public housing wasn't developed in Richmond until 1954, it was built in those neighborhoods that received "D" grades from the HOLC and which also happened to be predominantly black. Concentrating public housing into these neighborhoods, isolated from economic opportunities, ensured that low-income minorities were concentrated into the eastern portion of the city. The impact of these programs is clearly evident today as these neighborhoods, several generations of residents later, remain concentrated areas of poverty. Map 16 shows the City of Richmond HOLC map with public housing developments and current R/ECAP tracts.

Map 15: Public Housing Location and R/ECAPs; 2009-2013 5-Year Estimates

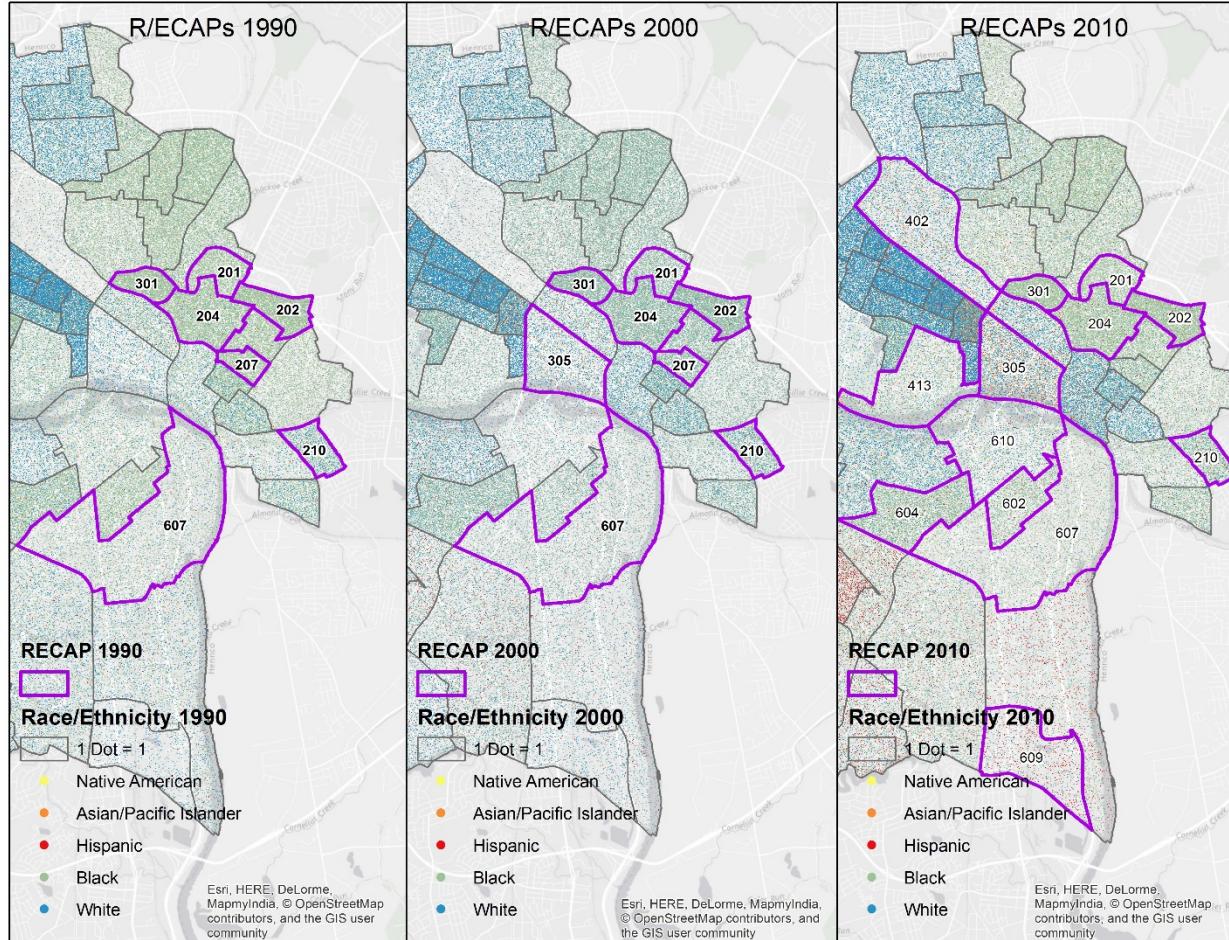


Map 16: R/ECAPs, HOLC, and Public Housing



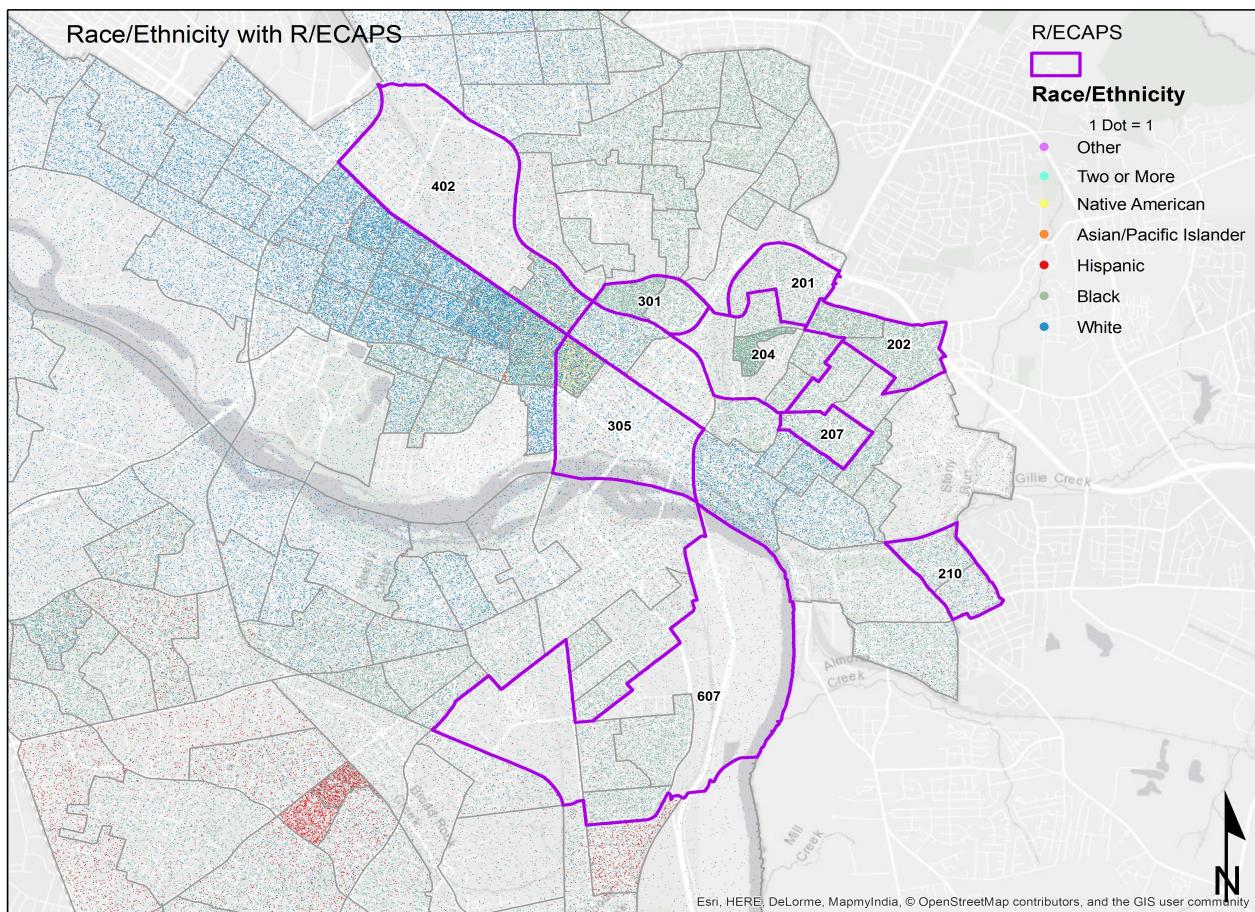
From 1990 to 2000 an additional census tract (tract 305) met the R/ECAP threshold. This tract includes most of the central business district and is bound on the west by Lombardy Ave. and Broad Street to the north. It is most likely that the majority of residents in this area are enrolled at Virginia Commonwealth University, and though may have limited income, do not suffer the ill effects of inter-generational or childhood poverty in the same manner as those in R/ECAPs elsewhere in the city. By 2010, 13 census

*Map 17: R/ECAP Trends*



tracts met R/ECAP criteria. 6 new tracts were added to those from 2000 and one no longer met the criteria. New tracts that met R/ECAP criteria were tracts: 402, 413, 602, 604, 609, and 610; tract 207 was removed. The growth of Virginia Commonwealth University between 2000 and 2010 combined with the economic impact of the recession from 2007 through 2009 are, at a minimum, partially responsible for the addition of these new tracts. Census tracts 402, 602, and 610 saw an increase in market rate student housing. Often the student population can serve to skew the poverty rate of a neighborhood given their overall negligible income. Map 17 shows the change in tracts that qualified as R/ECAPs from 1990 to 2010. Map 18 shows the current location of R/ECAP qualifying tracts. Fortunately, from 2010 to present day, the number of R/ECAPs has declined from 13 to nine. Census Tracts 413, 604, 610, 602, and 609 no longer qualify as R/ECAPs.

Map 18: Current R/ECAPS



## 2. Additional Information

All relevant information, including additional information has been included and discussed in the analysis above.

## 3. Contributing Factors of R/ECAPs

**Contributing Factor:** Limited Transit Access

**Prioritization:** Moderate

**Justification:**

The lack of regional transit serving high-job areas in the counties serves to limit employment, education, and housing options for city residents.

**Contributing Factor:** Lack of Investment in Specific Neighborhoods

**Prioritization:** Moderate

**Justification:**

The private market simply does not provide housing for households earning less than 50% AMI. This need has traditionally been met by the public sector. Current federal budgetary constraints indicate that support from outside the city may be less than dependable.

**Contributing Factor:** Public education disparities reinforce residential segregation

**Prioritization:** High

**Justification:**

Richmond City Schools have long faced challenges including aging infrastructure and decreased federal and state funding, the allocation of which is regressively based on performance and disproportionately negatively impacts urban districts across the state. High performing elementary school districts in the city correlate to neighborhoods with higher property values making them largely only accessible to middle and upper income households.

**Contributing Factor:** Spatial mismatch between jobs and skills in R/ECAPs

**Prioritization:** High

**Justification:**

Low educational attainment, workforce readiness and job access prevents many low-income city residents from engaging in stable employment opportunities within the City.

**Contributing Factor:** Private Discrimination

**Prioritization:** High

**Justification:**

Source of income housing discrimination limits housing options for those households using housing choice vouchers. Additionally, overly broad criminal history residency policies make rental housing nearly impossible for many households to secure. Given disparate sentencing and incarceration rates, minorities, particularly Black males, face severely constrained housing options.

### **iii. Disparities in Access to Opportunity**

#### **1. Analysis**

##### **a. Educational Opportunities**

- i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.*
- ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.*
- iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?*

Residential segregation is reflected, and in many cases, magnified in the school's children attend. In Virginia, the public education system is intensely segregated and like much of the country, racial isolation in schools is intensifying.<sup>1</sup> In Virginia, the divisions between independent cities and their suburban counties, school districts, and attendance zones all draw color lines that separate students. Along with the political geography underlying segregation in Virginia is the state's history as the center of opposition to school desegregation. After the Supreme Court ordered the South to dismantle Jim Crow "with all deliberate speed" in 1955, Virginia's leaders undertook a concerted strategy to obstruct integration known as Massive Resistance. Between 1956 and 1959, the state's Pupil Placement Act created a system for student school assignment that did not allow a single black child to attend a white school. Schools in Charlottesville, Norfolk, Warren County and Prince Edward County were closed altogether to avoid integration. In the case of Prince Edward County, the closure lasted from 1959 to 1964. It was not until the U.S. Supreme Court ruling in 1968, (*Green v. County School Board of New Kent County*), that the state's "freedom of choice" plan was struck down and large-scale desegregation took place.<sup>2</sup>

The following generation of students saw an immense reduction in the education attainment gap. Nationwide, a 39 point difference in reading scores between white and black 13 year old's was reduced by more than half to 18 points between 1971 and 1988.<sup>3</sup> A study measuring the long run impacts of court ordered school desegregation found that desegregation significantly increased occupational attainments, college quality and adult earnings, reduced the probability of incarceration, and improved adult health status.<sup>4</sup> All of these improvements occurred without any measurable negative impact on white students.

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<sup>1</sup> Siegel-Hawley, Genevieve. "Miles to Go: A Report on School Segregation in Virginia, 1989-2010." *Civil Rights Project/Proyecto Derechos Civiles* (2013).

<sup>2</sup> Boger, John Charles, and Gary Orfield, eds. *School resegregation: Must the South turn back?*. Univ of North Carolina Press, 2005.

<sup>3</sup> Kena, G., Musu-Gillette, L., Robinson, J., Wang, X., Rathbun, A., Zhang, J., Wilkinson-Flicker, S., Barmer, A., and Dunlop Velez, E. (2015). The Condition of Education 2015 (NCES 2015-144). U.S. Department of Education, National Center for Education Statistics. Washington, DC. Retrieved 08/21/2015 from <http://nces.ed.gov/pubsearch>.

<sup>4</sup> Johnson, Rucker C. *Long-run impacts of school desegregation & school quality on adult attainments*. No. w16664. National Bureau of Economic Research, 2011.

There is substantial evidence that the achievement gap would have continued to shrink with continued school desegregation.<sup>5</sup> However, courts began a path of reversal on school integration beginning with the U.S. Supreme Court Case *Board of Education of Oklahoma City Public Schools vs. Dowell* in 1991. The Supreme Court ruled that a federal court desegregation order should end once schools have achieved unitary status, even if abandoning the order would mean swift resegregation. Lower courts across the country followed suit, and as school districts achieved “unitary status,” integration methods such as school busing were ceased. In Virginia, this has meant resegregation.

The fact is, schools today are still separate and continue to remain unequal. Studies tie high levels of racial isolation and socioeconomic disadvantage to schools with larger class sizes, less qualified teachers, high levels of teacher turnover, and inadequate facilities and learning materials.<sup>6</sup> In addition to school inequality, the resources brought to the school by the students themselves are uneven. Students and their families from minority segregated

communities face higher levels of poverty, higher unemployment rates, lower levels of educational attainment, and worse health measures.<sup>7</sup>

Compounded, these differences have lasting influences on students' educational attainment and future success.

HUD created a school proficiency index which measures the performance of 4<sup>th</sup> grade students on state examinations to describe which neighborhoods have high-performing elementary school nearby and which are near lower performing elementary school.<sup>8</sup> Values are ranked at the state level and range from 0 to 100; the higher the score, the higher the quality of the school in the neighborhood.<sup>9</sup>

Table 1 shows the school proficiency values for each primary racial/ethnic group. Non-Hispanic white and Asian students have access to higher performing schools than other racial/ethnic groups. Black and Hispanic students have access to the lowest performing schools in the City.

Richmond's schools are predominantly minority. Figure 1 shows the enrollment demographics of the city's schools from 2016.<sup>10</sup> Minority students account for 87.8% of the entire student body; black students makeup 69%, Hispanic student account for 15.1%, white student, 12.2%, and Asian students

*Table 1: School Proficiency Index by Race/Ethnicity; 2013-2014*

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	School Proficiency Index
<b>Total Population</b>	
White, Non-Hispanic	50.63
Black, Non-Hispanic	24.79
Hispanic	25.98
Asian or Pacific Islander, Non-Hispanic	50.88
Native American, Non-Hispanic	31.02
<b>Population below federal poverty line</b>	
White, Non-Hispanic	48.49
Black, Non-Hispanic	24.08
Hispanic	30.11
Asian or Pacific Islander, Non-Hispanic	52.86
Native American, Non-Hispanic	32.99

<sup>5</sup> Orfield, Gary, and Chungmei Lee. "Historic Reversals, Accelerating Resegregation, and the Need for New Integration Strategies." *Civil Rights Project/Proyecto Derechos Civiles* (2007).

<sup>6</sup> Siegel-Hawley, Genevieve. "Miles to Go: A Report on School Segregation in Virginia, 1989-2010." — *The Civil Rights Project at UCLA*. N.p., 13 Mar. 2013. Web. 24 Aug. 2015.

<sup>7</sup> Johnson, Rucker C. *Long-run impacts of school desegregation & school quality on adult attainments*. No. w16664. National Bureau of Economic Research, 2011

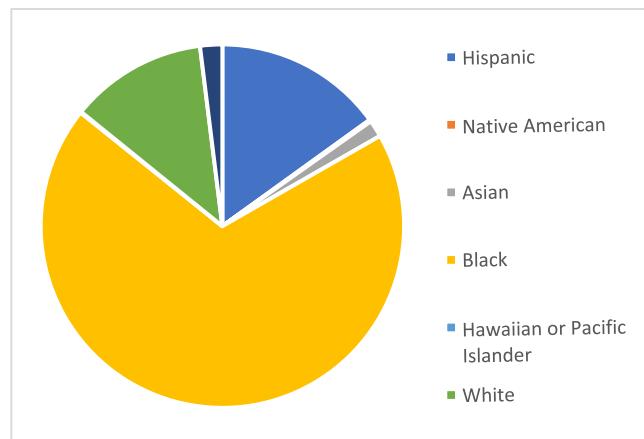
<sup>8</sup> HUD Office of Policy Development & Research. Affirmatively Furthering Fair Housing Tool (AFFH-T) Data Documentation. Data Version AFFHT0003. July 2017.

<sup>9</sup> Ibid.

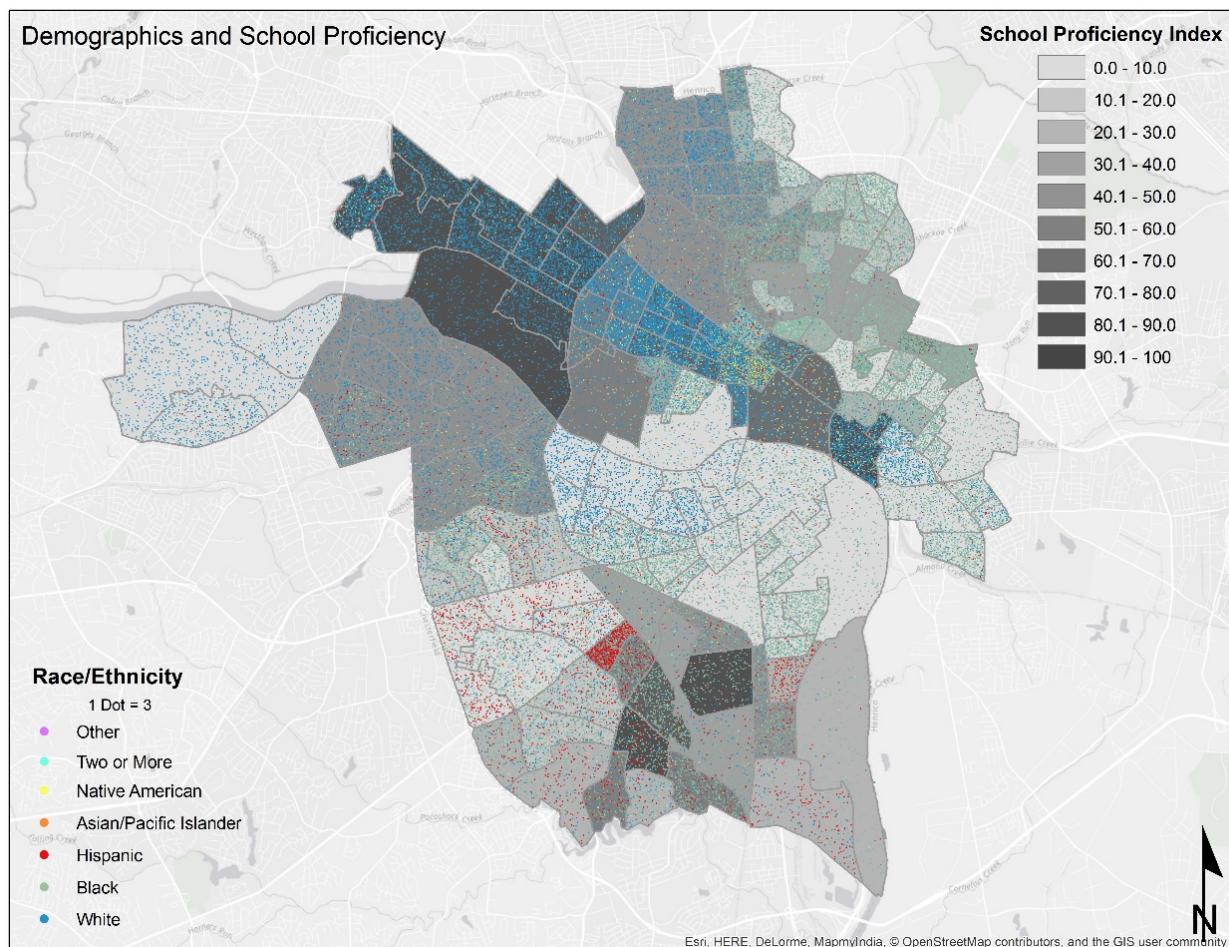
<sup>10</sup> Virginia Department of Education. 2016-2017 Student Membership by School (Grade, Ethnicity, & Gender). 11/30/2016.

just 1.5%. Individual school demographics vary only slightly. Elementary schools are where racial/ethnic isolation is most pronounced; white students make up more than 10% of the student body in only four of the city's schools and are the majority in only two. This pattern is further complicated by the city's open-enrollment policy in which children are automatically enrolled in the elementary school within their district but may choose to apply via lottery to attend another school in the city. In addition to the city's generally high levels of residential segregation, this policy has helped to consolidate white students in just a handful of schools. Since Richmond Public Schools provides no transportation to open enrollment students, access is limited to families with access to an automobile and the resources to transfer students from home to a distant school. Map 1 attempts to show this complex phenomenon of residential segregation and educational performance at the elementary school level.

Figure 1: RPS Enrollment, 2016

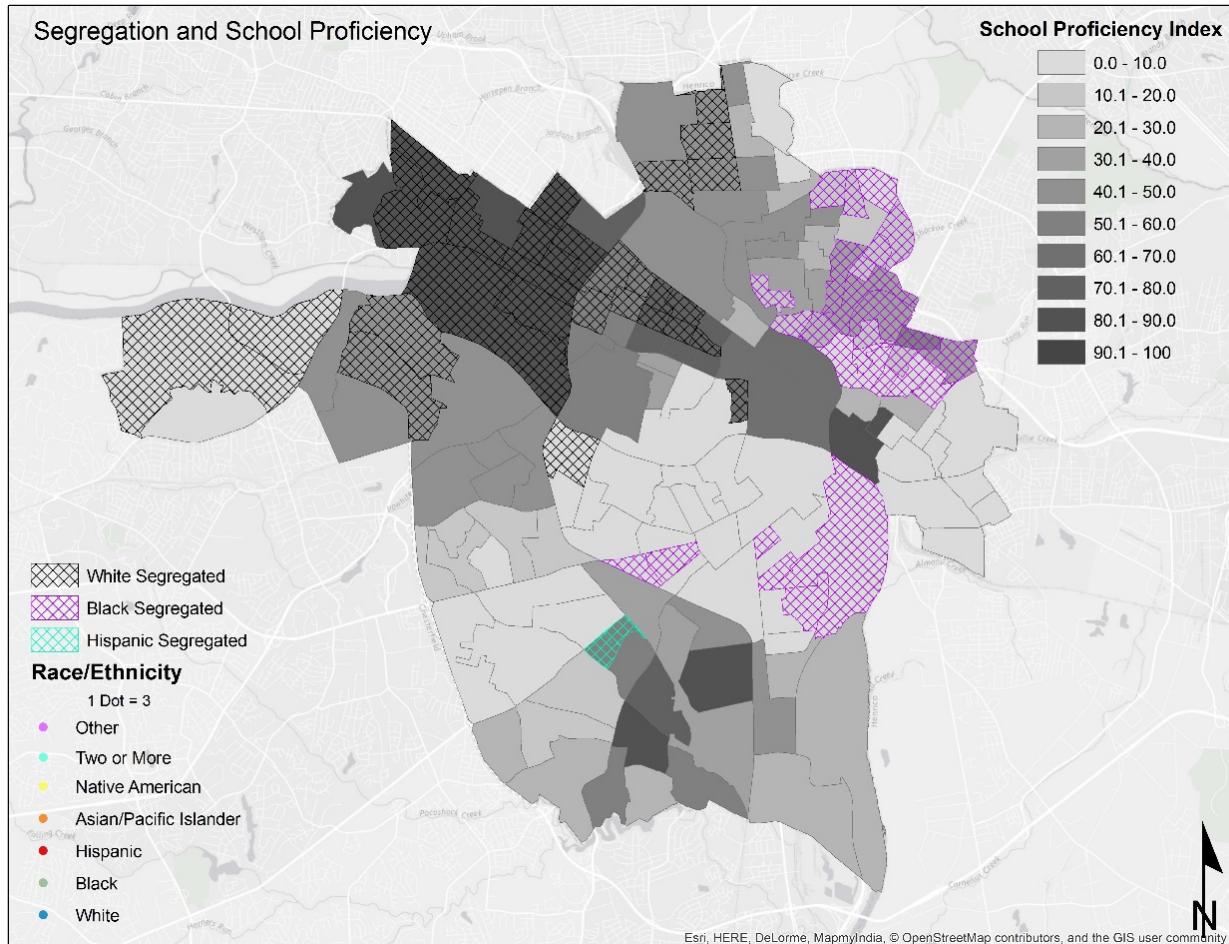


Map 1: School Proficiency and Race/Ethnicity; 2013-2014



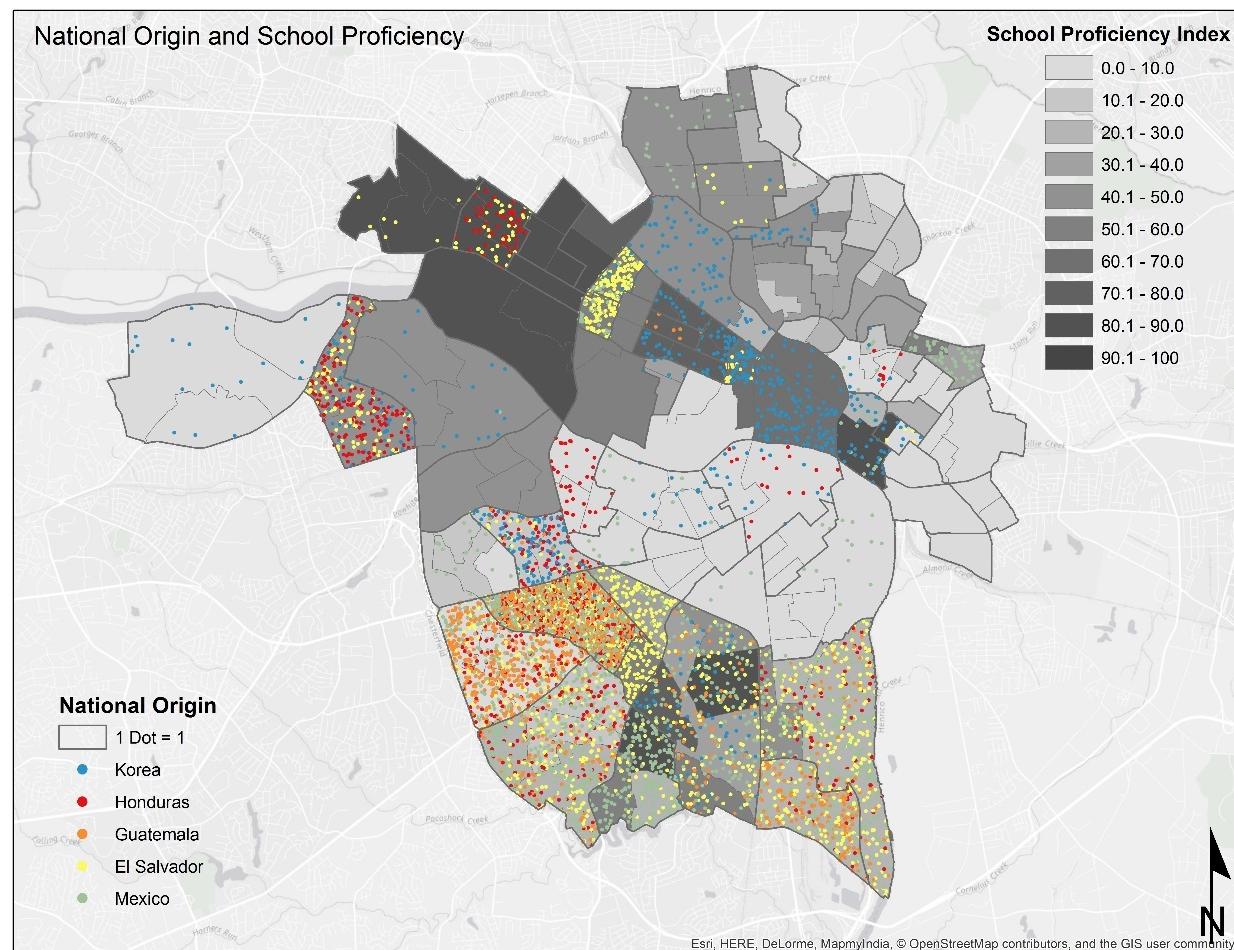
The racial divide becomes even more apparent when examining school proficiency with those segregated areas of the city. Map 2 shows those neighborhoods that are segregated white, segregated black and segregated Hispanic. Segregated white areas have the highest performing schools in the city, while segregated black neighborhoods have among the lowest.

*Map 2: School Proficiency and Segregation; 2013-2014*



Foreign-born residents from the five most common countries shown in Map 3 reside in neighborhoods that are near the bottom in terms of school proficiency with several exceptions. A small number of residents from El Salvador and Honduras have access to the relatively high proficiency schools in the city's Westend, Korean residents are clustered in the fan and central business district and likewise have access to higher performing schools. Residents from all five countries have access to high performing schools in limited parts of the city's Southside. Overall, foreign-born residents appear to have access to an array of neighborhoods that provide educational opportunities comparable to other groups in the city. Overall, educational opportunities for the children of residents from other countries appear to be limited more from the lack high performing elementary schools.

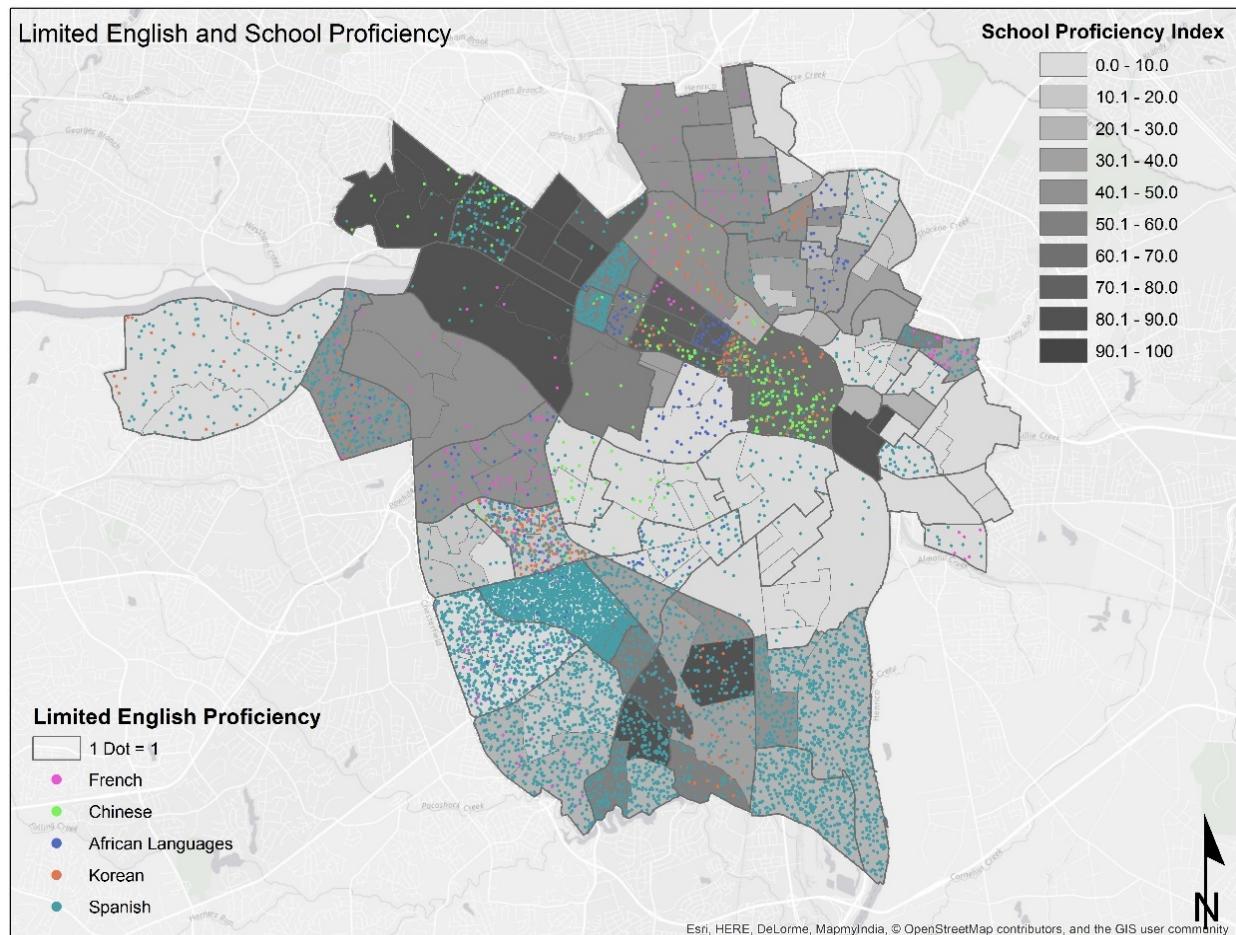
Map 3: National Origin and School Proficiency; 2013-2014



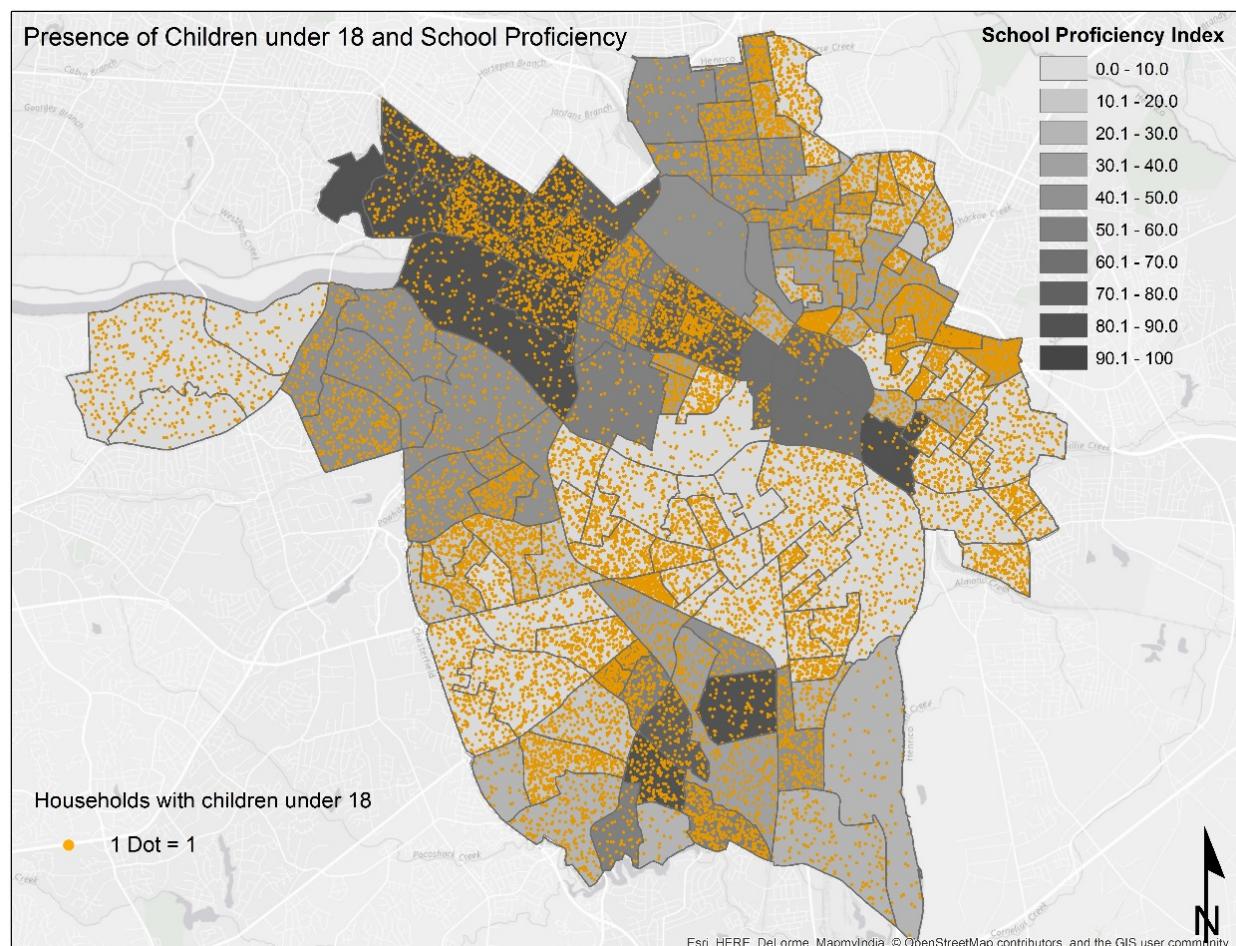
Map 4 shows the LEP population in relation to school proficiency. LEP residents appear to have access to some higher performing schools dependent upon location and language spoken. Spanish speaking residents, though predominantly residing in the southside of the city appear to have access to a variety of neighborhoods throughout the city and thus, access to at least average educational opportunities. Korean and Chinese speaking residents have access to neighborhoods with higher than average school proficiency – namely in central business district and Westend.

Map 5 shows family households with school age children and school proficiency. Generally, family households with children have access to the full spectrum of public elementary schools, though there are quite a few neighborhoods that have extremely low school proficiency values and high populations of family households with school age children. However, as previously discussed, several census tracts have higher than average rates of families with children, several of which are identified R/ECAPs. These tracts house some of the very poorest residents in the city and have some of the lowest educational opportunities available to them. If education is truly to serve as the ladder out of poverty, access to high performing schools can no longer be the bastion of white children but rather must become equitably distributed throughout the city. Residential location should not be the predictor of educational performance.

Map 4: LEP and School Proficiency; 2013-2014



Map 5: Family Households with Children and School Proficiency; 2013-2014



## b. Employment Opportunities

- i. *Describe any disparities in access to jobs and labor markets by protected class groups.*
- ii. *How does a person's place of residence affect their ability to obtain a job?*
- iii. *Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?*

Residential location plays a critical role in accessing economic opportunities such as gainful employment. HUD provides two indices with which to better understand the role that residential segregation plays in exacerbating economic inequality: The Jobs Proximity Index and the Labor Market Engagement Index. The jobs proximity index quantifies the accessibility of a given neighborhood as a function of its distance to all job locations within a region; larger employment centers are more heavily weighted and employment centers are weighted less heavily the further away they are located.<sup>11</sup> The higher the index value, the better access to employment opportunities for residents in a neighborhood.<sup>12</sup> Thus, the darker shaded areas reflect employment dense areas that are centrally located to housing. The lighter shades reflect areas that are less job-rich and/or may be further away from residential neighborhoods.

Table 2 shows the jobs proximity values for each of the predominant racial/ethnic groups in the city. Asian or Pacific Islanders have the greatest access to jobs; collectively, their jobs proximity value is the highest at 68.01. This is not surprising given the cluster of Asian or Pacific Islander residents in, and near to, the central business district. White residents enjoy the second highest access to jobs; Hispanic and Black residents have the lowest index values, 46.05 and 44.50 respectively. This is significantly lower than their white counterparts.

Map 6 shows the spatial distribution of the jobs proximity index as it relates to the demographic composition of the city. It is difficult to identify any obvious spatial relationships. However, given the information provided in Table 2 it is safe to conclude that though there appears to be a broad spectrum of jobs proximity within the city Non-Hispanic whites and Asian or Pacific Islanders reside in areas that have greatest proximity to employment opportunities. Non-Hispanic Blacks and Hispanics have the most limited access to employment centers and thus may face longer travel times and bear additional expense to access employment opportunities.

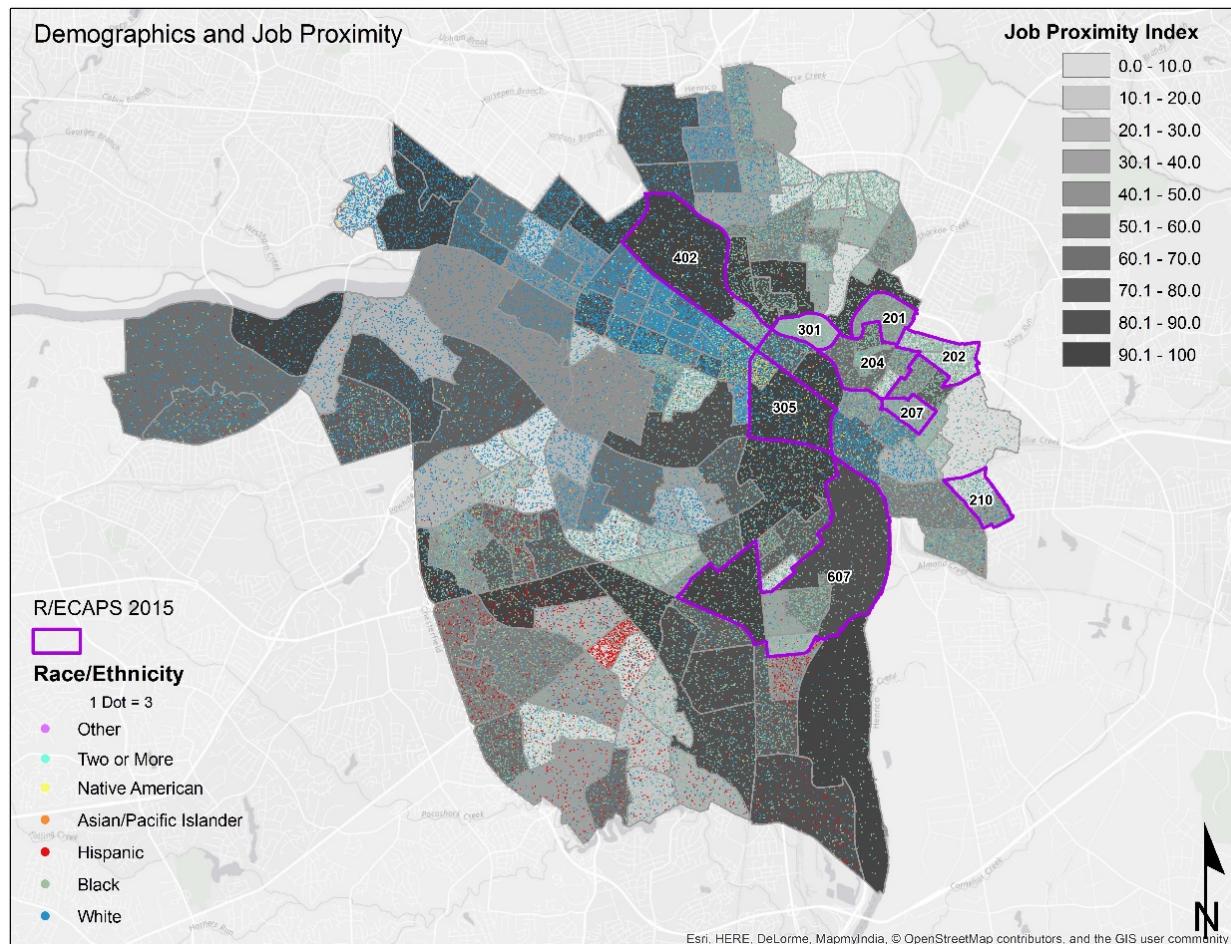
Table 2: Jobs Proximity Index; 2014

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	Jobs Proximity Index
<b>Total Population</b>	
White, Non-Hispanic	58.62
Black, Non-Hispanic	44.50
Hispanic	46.05
Asian or Pacific Islander, Non-Hispanic	68.01
Native American, Non-Hispanic	53.93
<b>Population below federal poverty line</b>	
White, Non-Hispanic	60.59
Black, Non-Hispanic	43.61
Hispanic	44.81
Asian or Pacific Islander, Non-Hispanic	71.77
Native American, Non-Hispanic	46.85

<sup>11</sup> HUD Office of Policy Development & Research. Affirmatively Furthering Fair Housing Tool (AFFH-T) Data Documentation. Data Version AFFHT0003. July 2017.

<sup>12</sup> Ibid.

Map 6: Demographics and Jobs Proximity; 2014



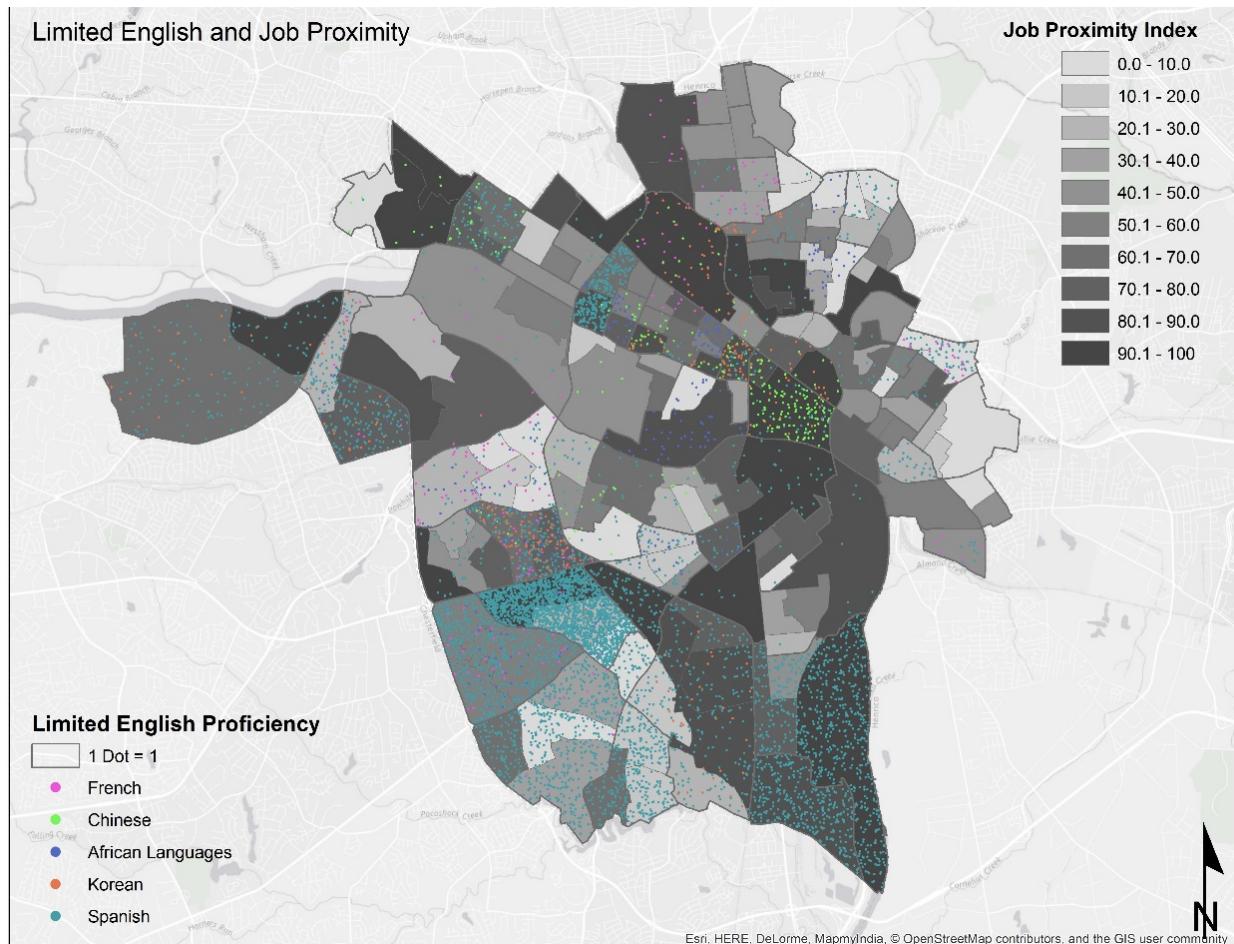
Additionally, there exists a spatial jobs/skills mismatch in which many of the employment opportunities in the central business district are not available to many city residents due to a mismatch of skills. Many of these residents are also unlikely to be able to access jobs in the suburbs due to limited regional public transit access which serves to restrict opportunity to those households/individuals with access to an automobile. This phenomenon has been well documented, most notably by the Kerner Commission report in 1968 which referred to the physical separation between jobs in the distant suburbs and potential workers who were residents of the ghetto as “spatial mismatch.”<sup>13</sup> Further complicating this spatial mismatch, drivers with unpaid vehicular/traffic related fees can have their driver’s license suspended as per Virginia State Code. This potentially has a disparate impact on lower-income residents and members of other protected classes.

Map 7 shows the proximity to jobs of LEP individuals. Again, identifying a spatial relationship is difficult solely based upon looking at a map. However, there do not appear to be any glaring disparities in jobs proximity based on the neighborhood location of LEP individuals. Certainly, there are some neighborhoods with lower proximity values, as there are neighborhoods with higher proximity values. However, it appears that LEP individuals do not face residential barriers to employment but may

<sup>13</sup> Goldsmith and Blakely. Separate Societies: Poverty and Inequality in U.S. Cities. Temple University Press. Philadelphia. 1992.

potentially face employment discrimination based on national origin or inability to speak English. The Spanish speaking community in Southside has a strong entrepreneurial element and “informal” employment segment. The jobs proximity index may be slightly higher if these types of employment were included.

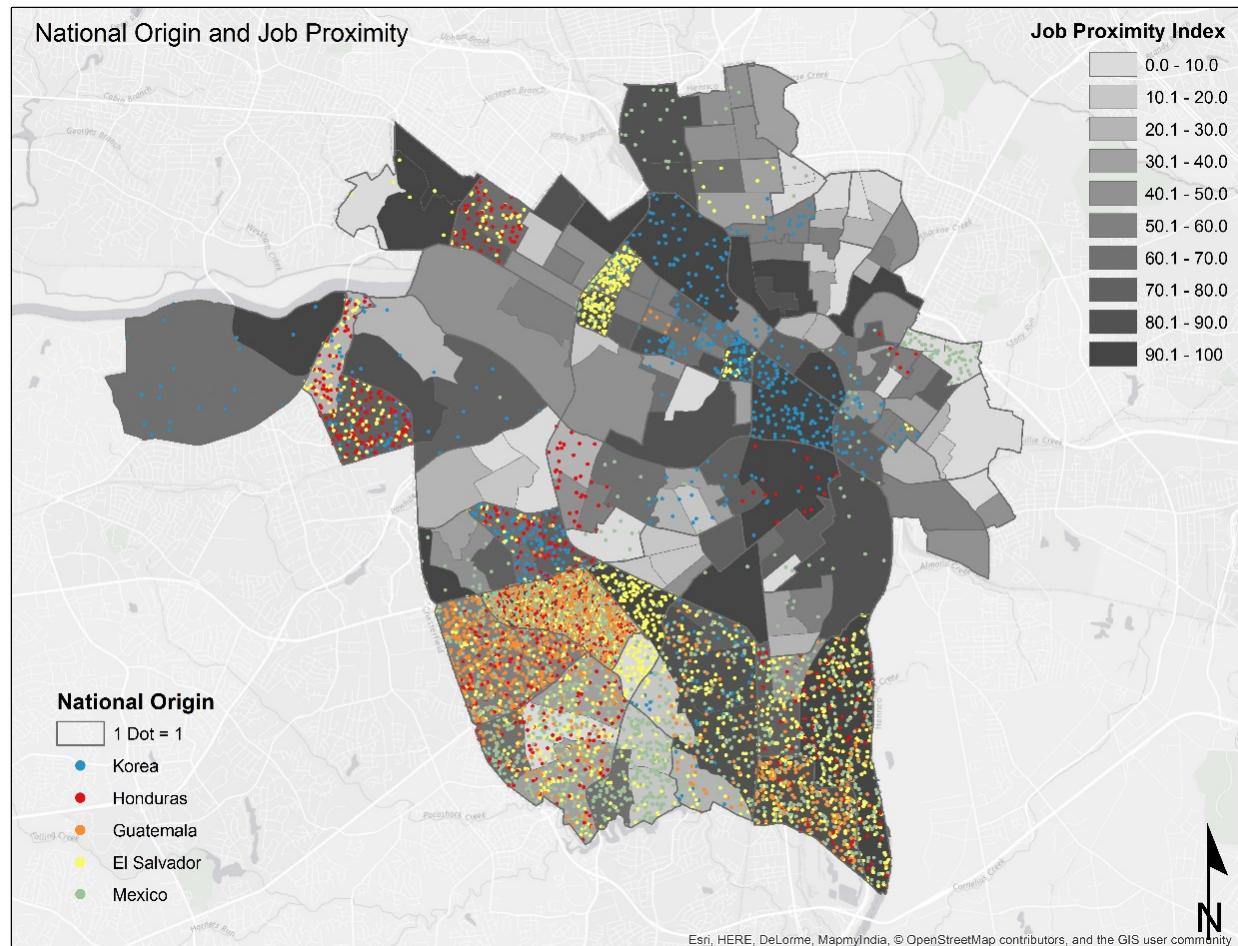
*Map 7: LEP and Jobs Proximity; 2014*



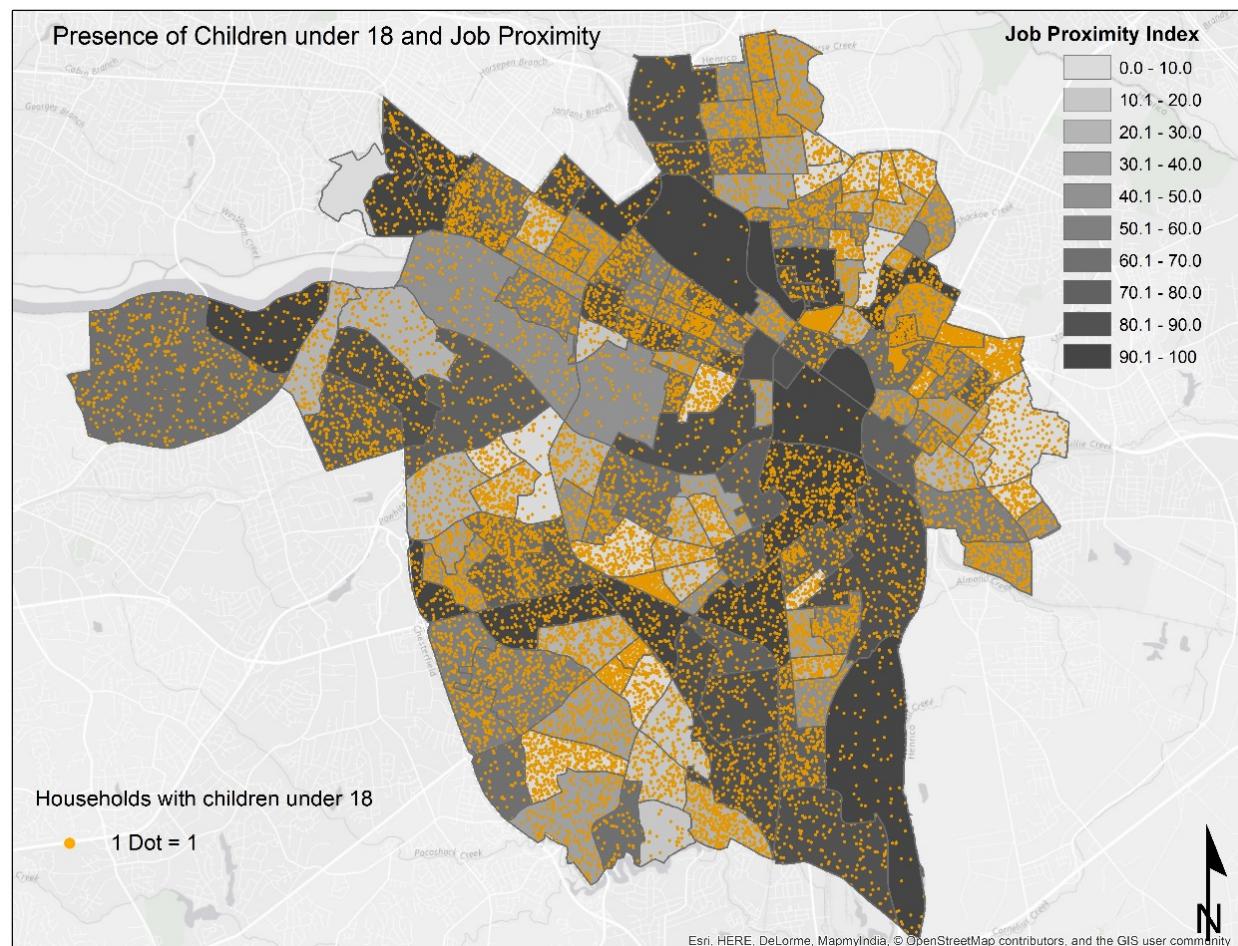
Map 8 shows foreign-born residents from the five most common countries in relation to jobs proximity. Overall, it appears that though there is some residential clustering based upon national origin, they all have relatively equal access to employment opportunities. However, due to employment qualifications, limited ability to speak English, and employment discrimination many of these residents may not, in effect, have access to the same array of employment opportunities that other protected classes of residents may have.

Map 9 below shows family households with children under 18 and job proximity. If anything, the spatial correlation between families with children and job proximity reveals a stronger presence of families with children residing in less job-rich areas of the city. Which makes sense as families with children are more likely to reside in primarily residential neighborhoods.

Map 8: National Origin and Job Proximity; 2014



Map 9: Family Households with Children and Jobs Proximity; 2014



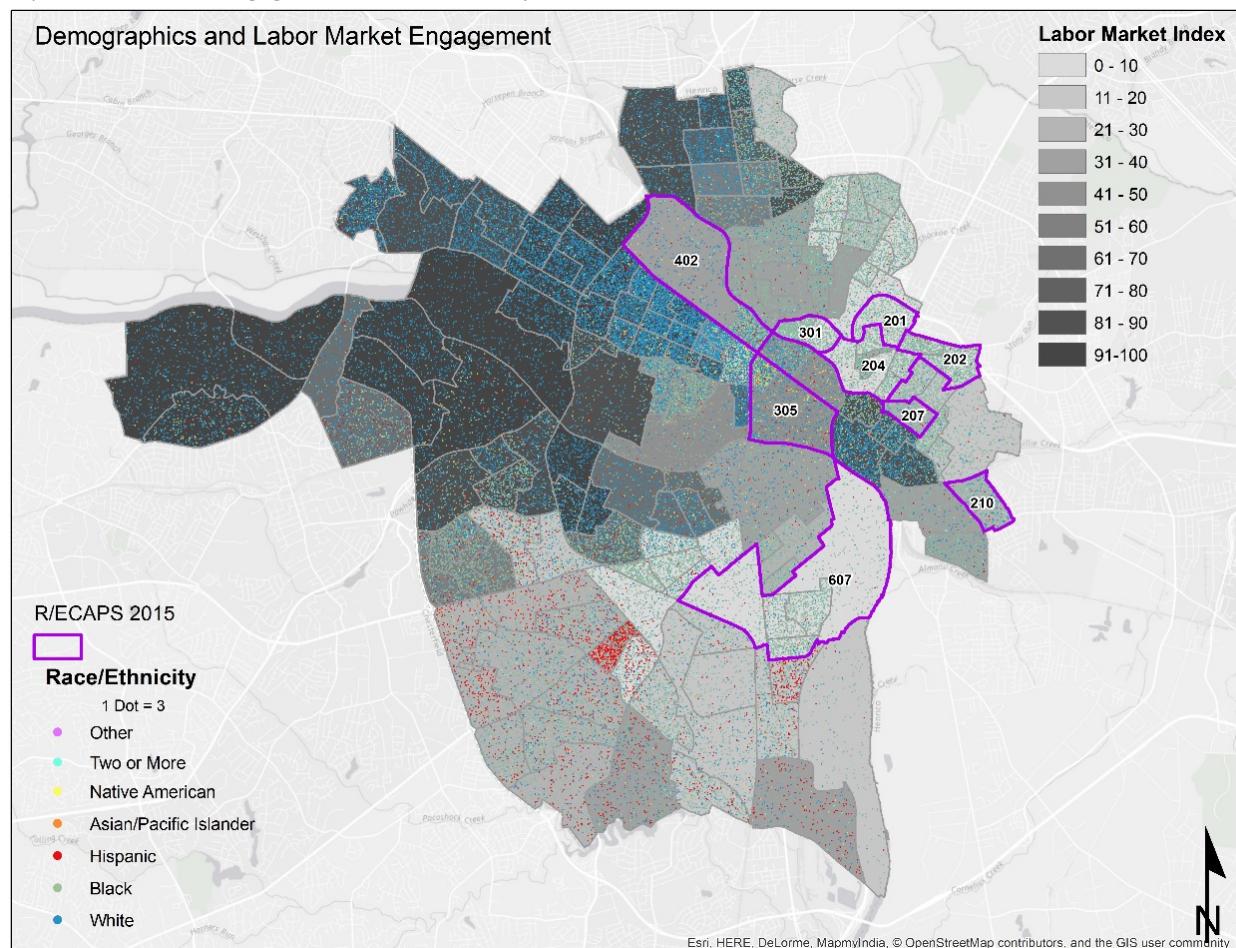
The second labor-related index provided by HUD is the Labor Market Engagement Index. This index is a measure of the relative intensity of labor market engagement and human capital in a neighborhood.<sup>14</sup> In short, it is a measure of unemployment. The darker the shade of gray, the higher the labor market engagement (low unemployment); conversely, the lighter shade of gray, the lower labor market engagement (high unemployment).

Map 10 shows the relationship between labor market engagement and demographics. An obvious spatial correlation exists between where white residents live and high labor market engagement. Table 3 confirms this correlation; Non-Hispanic white residents have a labor market engagement index score of 72.27 compared to non-Hispanic blacks who, at 30.47, have the lowest labor market engagement score. This

*Table 3: Labor Market Engagement Index; 2009-2013 5-Year Estimates*

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	Labor Market Index
<b>Total Population</b>	
White, Non-Hispanic	72.27
Black, Non-Hispanic	30.47
Hispanic	36.05
Asian or Pacific Islander, Non-Hispanic	51.41
Native American, Non-Hispanic	44.14
<b>Population below federal poverty line</b>	
White, Non-Hispanic	60.32
Black, Non-Hispanic	25.01
Hispanic	32.79
Asian or Pacific Islander, Non-Hispanic	50.16
Native American, Non-Hispanic	35.23

*Map 10: Labor Market Engagement and Race/Ethnicity; 2009-2013; 5-Year Estimates*

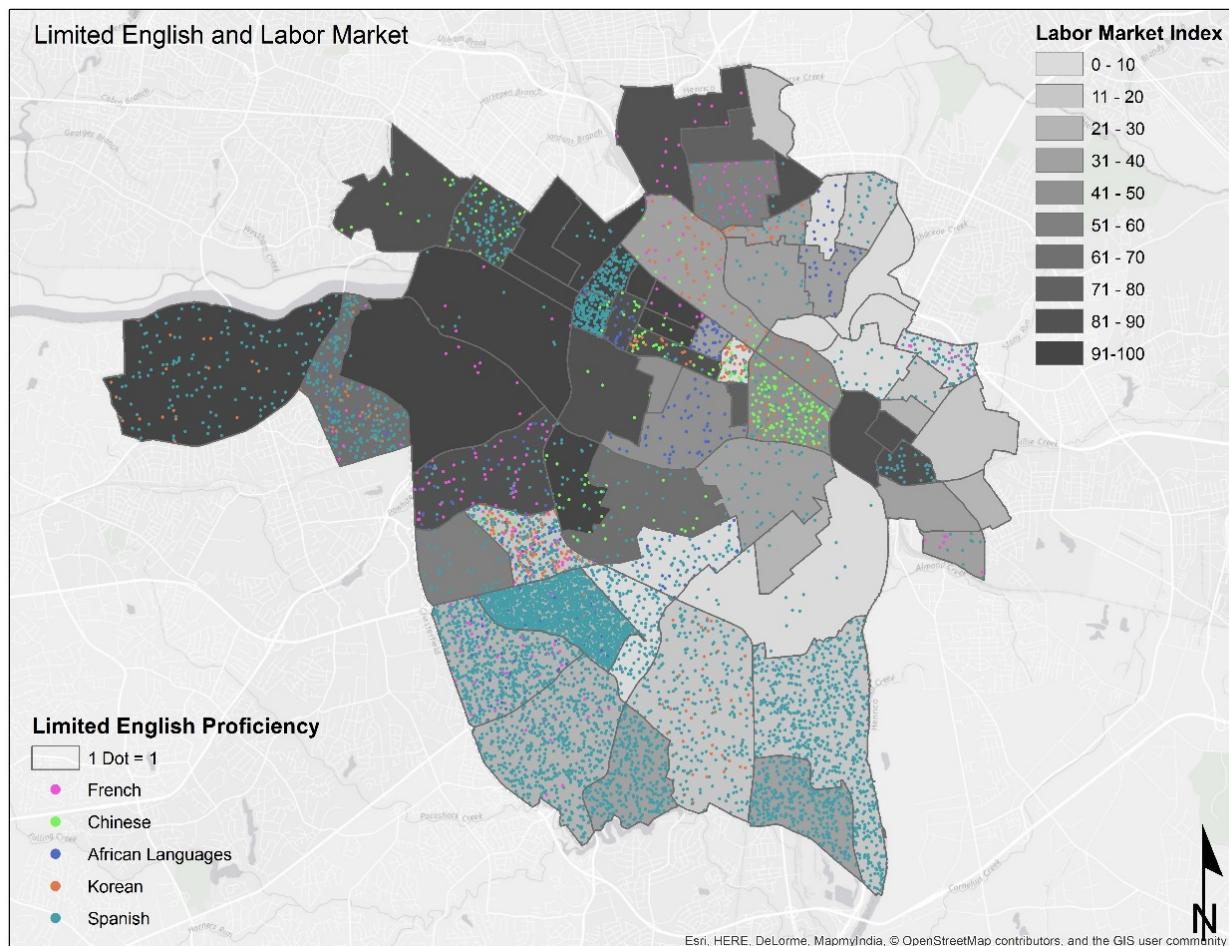


<sup>14</sup> HUD Office of Policy Development & Research. Affirmatively Furthering Fair Housing Tool (AFFH-T) Data Documentation. Data Version AFFHT0003. July 2017.

inequality confirms the spatial mismatch between residential location and job access discussed above. White residents have a far greater ability to be gainfully employed than do their non-white peers. Unfortunately, this disparity is only partially the result of residential location. Other factors influence labor market engagement, all of them rooted in racial bias, if not downright discrimination. Minorities, especially Blacks have been historically relegated to poor performing schools resulting in lower levels of lifetime earnings, they have been excluded from the possession of property, greatly diminishing inter-generational wealth accumulation, and have faced higher rates of incarceration resulting in limited employment opportunities.

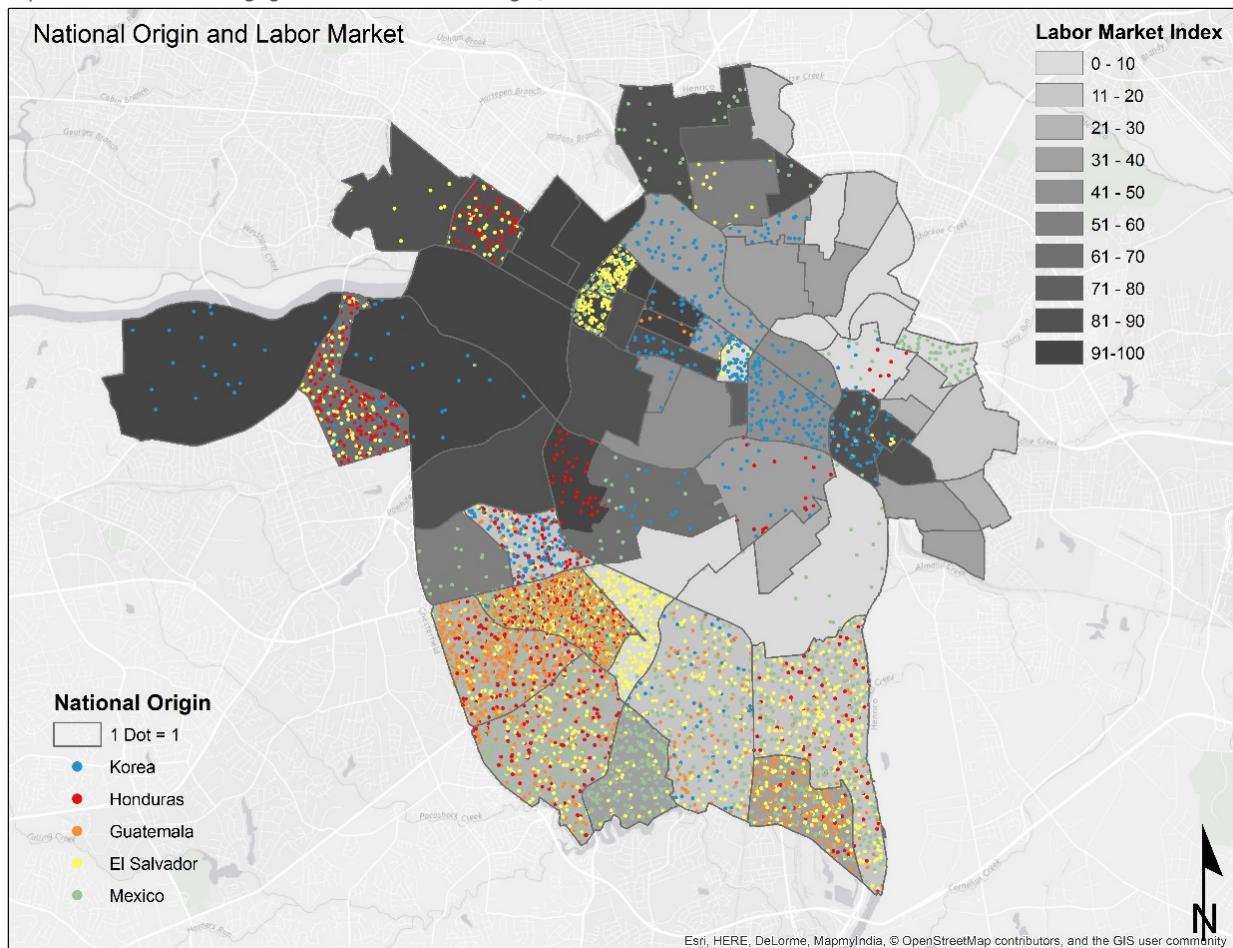
Map 11 shows the spatial relationship between labor market engagement and LEP individuals. Again, a strong spatial correlation exists, this time however, it is LEP individuals residing in areas with relatively low levels of labor market engagement. Most LEP Spanish speaking residents live in neighborhoods with very low levels of labor market engagement. In fact, with exception of the noticeable clustering of Spanish speaking residents in the near Westend, residents with a limited ability to speak English have among the lowest levels of labor market engagement in the City. Again, it is important to note that there exists a strong informal labor market within the Hispanic community in the Southside.

*Map 11: Labor Market Engagement and LEP; 2009-2013 5-Year Estimates*



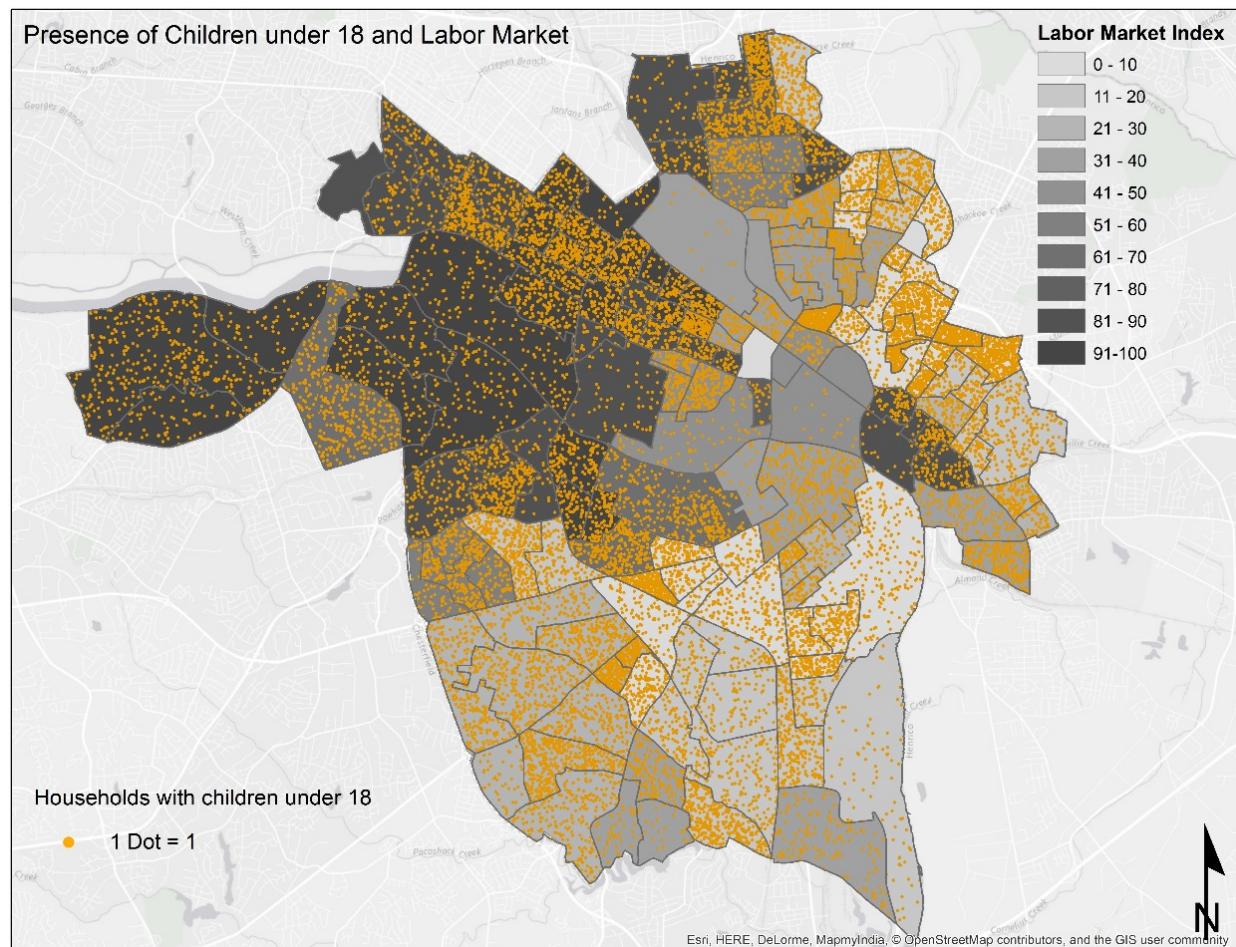
Map 12 shows the relationship between labor market engagement and where foreign-born residents reside. Koreans appear to have access to areas with high levels of labor market engagement as do numerous residents from Honduras. However, in general, the foreign-born population of the city resides in neighborhoods with among the lowest levels of labor market engagement. Again, this is not to suggest that these residents are unemployed, or unable to find employment, just that they are not employed in the formal economy. Based on conversations with community members, there exists a strong entrepreneurial spirit, particularly among the Latino community in the Southside of the city. Often, these businesses may take the form of microenterprises, serving to provide supplemental income.

*Map 12: Labor Market Engagement and National Origin; 2009-2013 5-Year Estimates*



Map 13 shows the relationship between the residential location of family households with children and labor market engagement levels. Overall, families with children reside in areas with high rates of employment. Approximately 10% of family households with children reside in neighborhoods with labor market engagement values of 10 or less. These areas tend to coincide with the location of public housing.

Map 13: Family Households with Children and Labor Market Engagement; 2009-2013 5-Year Estimates



Certain occupations are more common than others among working residents. Service workers constitute the largest segment of employed Richmond residents – 19% of all workers – by a significant margin. Administrative support workers, other professional workers,<sup>15</sup> management, business and financial professionals, and sales workers also constitute the next largest segments of employed residents. Those five occupational groups represent 69% of the city’s working residents. Figure 2 shows the demographics of residents employed in the formal economy by occupation classification.

Working residents also differ in their occupations by race and ethnicity. Black residents are underrepresented in the large “other professional” and management, business, and financial groups as well as in the smaller groups of healthcare practitioner and science, engineer, and computer professionals. Employment for Richmond’s Black residents appears to be concentrated in the large service and administrative occupations, and the mid-sized labor-intensive occupations.

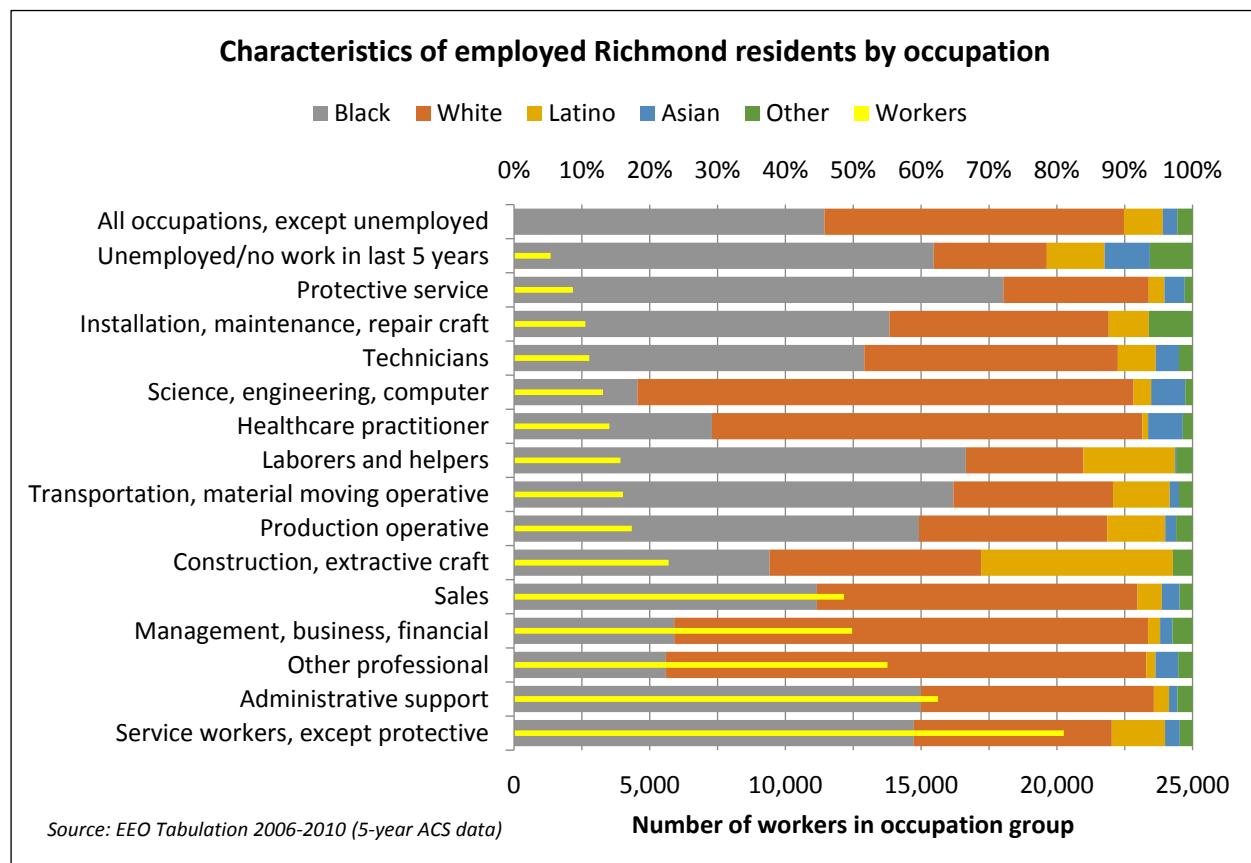
<sup>15</sup> As defined in EEO data

White residents are concentrated in large professional occupations and management, business, and finance occupations as well as smaller groups such as healthcare and science, engineering, and computer occupations.

Latino residents have the most severe concentrations of any race or ethnicity. More than a quarter of the working Latino population is employed as a service worker. Another quarter is employed in the construction occupation group. The healthcare occupation group is notably lacking in Latino workers.

And the Asian population is heavily concentrated in professional, service, sales, and management occupations. According to estimates, almost no Asians are employed in the construction, maintenance, and laborer occupations.

*Figure 2: Employment Characteristics; 2006-2010*



### c. Transportation Opportunities

- i. *Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.*
- ii. *Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?*
- iii. *Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.*

Much has been written about the lack of access to jobs for minorities in inner-cities across the country. The term “spatial mismatch” which describes the physical separation between jobs in the suburbs and inner city residents was coined 45 years ago.<sup>16</sup> Due in large part to the geographical restructuring of the manufacturing industry which was dependent upon the manual labor found in America’s inner cities, and federal housing and transportation policy which subsidized the auto-centric, sprawling development of the suburbs, this spatial mismatch is greatly enhanced in Richmond for a variety of historical and political reasons.

A report released in 2012 by the Brookings Institute ranked the Richmond region 94<sup>th</sup> out of 100 in metro areas in terms of the share of jobs that are served by public transportation.<sup>17</sup> Additionally, a public transportation needs assessment conducted by the Richmond Area Metropolitan Planning Organization (RAMPO) found that the existing fixed-route bus service does not provide access to many employment areas in the region, especially those found in the suburbs.<sup>18</sup> The Mayor’s Anti-Poverty Commission report makes a case for regional public transportation as a game-changer in the reduction of poverty in the city by making jobs in high employment areas accessible to unemployed and underemployed city residents. Unfortunately, the role of housing choice in access to public transportation is overlooked.

Map 1 shows the number of jobs located in the Richmond region (green dots of varying size). The orange area depicts a half mile buffer along existing bus routes. For the most part, GRTC provides service to the majority of jobs in the region; the noticeable exception being the Short Pump area in western Henrico County represented by the significant cluster of jobs in the northwest quadrant of the map.

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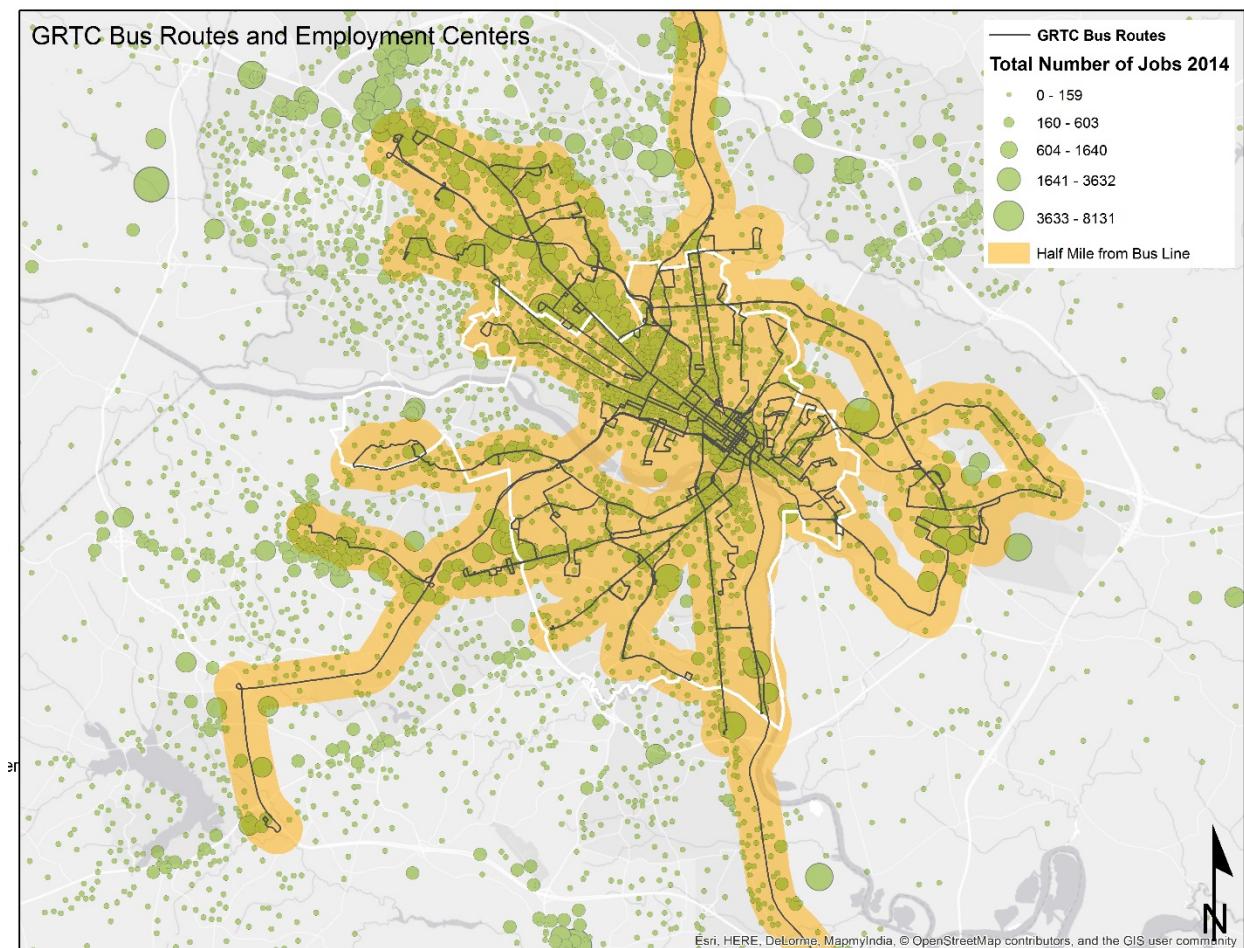
<sup>16</sup> Blakely, Edward, Goldsmith, William. Separate Societies: Poverty and Inequality in U.S. Cities. Temple University Press. Philadelphia. 1992.

<sup>17</sup> Adie Tomer, “Where the Jobs Are: Employer Access to Labor by Transit.” Brookings Institution, July 2012.

<sup>18</sup> Richmond Area Metropolitan Planning Organization. Public Transportation for the Elderly, Disabled, and Low-Income: Phase 1 – Needs Assessment. February 2, 2006.

[http://www.richmondregional.org/Publications/Reports\\_and\\_Documents/MPO/Eld\\_DisblD\\_Trans\\_Disadv\\_Report\\_FINAL\\_Feb\\_06.pdf](http://www.richmondregional.org/Publications/Reports_and_Documents/MPO/Eld_DisblD_Trans_Disadv_Report_FINAL_Feb_06.pdf)

Map 1: GRTC Bus Routes and Employment Centers; 2014



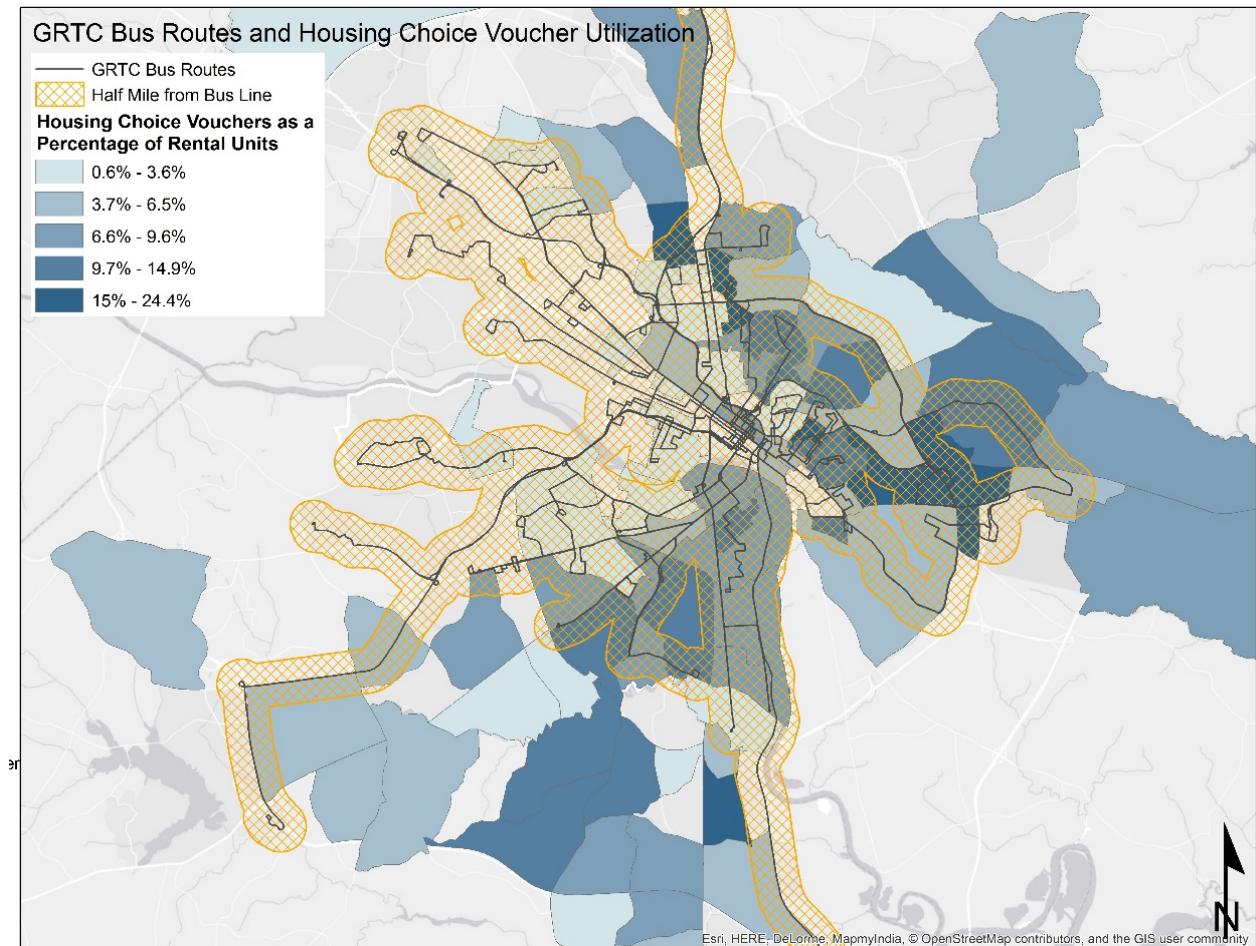
Unfortunately, the discussion surrounding enhanced public transportation revolves around the job/transit nexus; the housing/transit nexus is largely ignored. The housing choices of people who do not have cars are limited to areas in which public transportation is available, which in turn limits where they work, shop, seek medical care, and other services. The limitations of public transportation disproportionately affect lower income families, people with disabilities, and the elderly. The previously mentioned RAMPO public transportation needs assessment found that though elderly, disabled, and low-income city residents enjoy relatively full access to employment and other services within the city, all three groups experience limited access to opportunities in the neighboring counties.<sup>19</sup>

Map 2 shows GRTC bus routes, a half mile buffer in orange cross-hatch, and housing choice voucher utilization as a percentage of rental units per census tract. Using housing choice voucher utilization by census tract as a proxy for the location and distribution of affordable housing throughout the region reveals that there are very real deficiencies linking transit to affordable housing, in part due to the utter

<sup>19</sup> Richmond Area Metropolitan Planning Organization. Public Transportation for the Elderly, Disabled, and Low-Income: Phase 1 – Needs Assessment. February 2, 2006.  
[http://www.richmondregional.org/Publications/Reports\\_and\\_Documents/MPO/Eld\\_Disbld\\_Trans\\_Disadv\\_Report\\_FINAL\\_Feb\\_06.pdf](http://www.richmondregional.org/Publications/Reports_and_Documents/MPO/Eld_Disbld_Trans_Disadv_Report_FINAL_Feb_06.pdf)

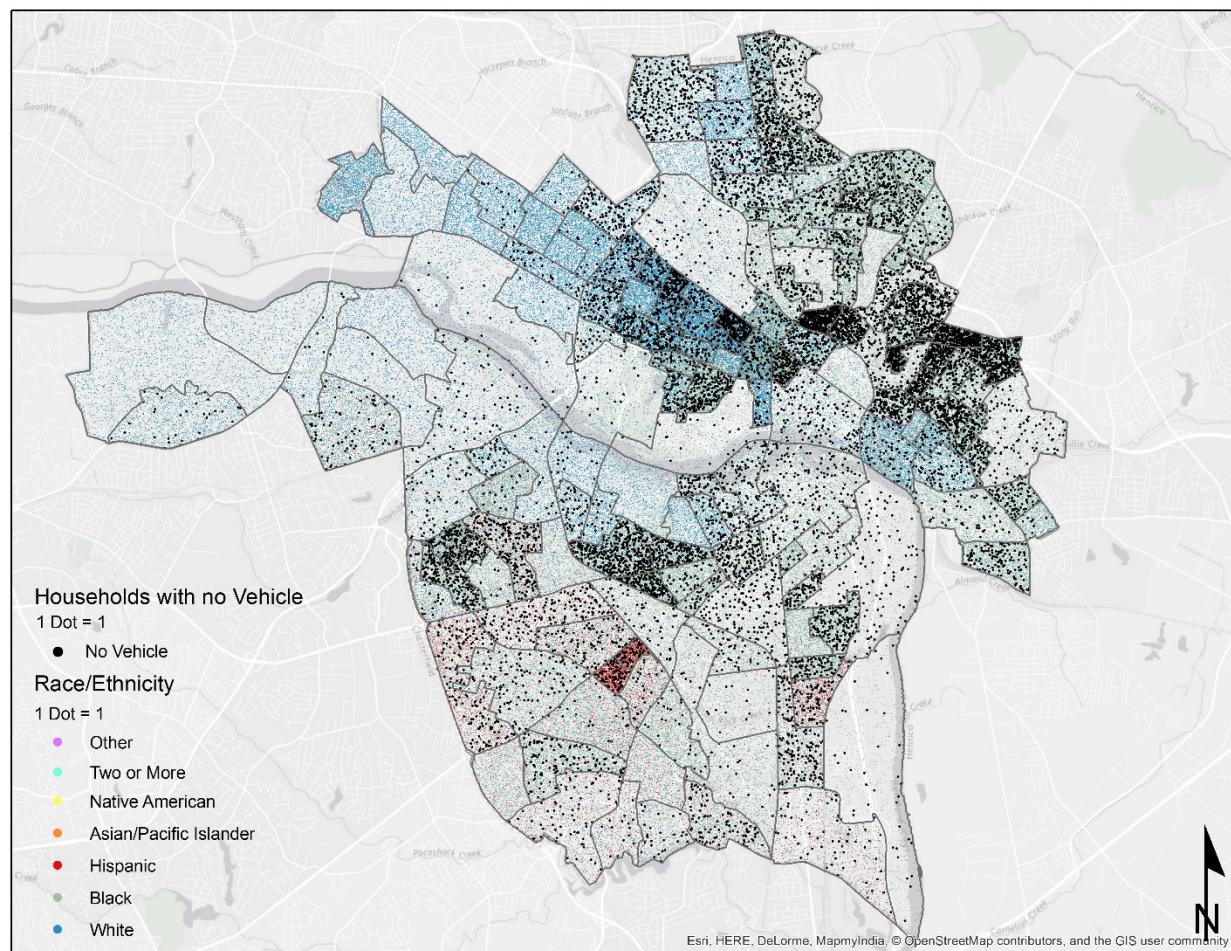
lack of affordable options in the western portion of the region and lack of transit access in much of Chesterfield County.

Map 2: GRTC Bus Routes and Housing Choice Voucher Utilization; 2014



Map 3 shows the households with no access to a vehicle. 16.8% of Richmond households lack access to a vehicle, 43% have access to one vehicle, 28% have access to 2 vehicles, and 11.1% have access to three or more vehicles. It is obvious that lacking access to a vehicle is largely a phenomenon experienced primarily among black households. Though there are pockets of households, most predominantly in the Fan area, that don't have access to a vehicle, lacking access to a vehicle appears to be common among black households.

Map 3: Households with no Vehicle Access; 2011-2015 5-Year Estimates



HUD provides two indices to examine disparities in access to transportation based on place of residence and cost. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation and the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. How often families use public transportation is a general indication of how readily available public transportation is in an area. This index is adjusted by income to further refine the measure as a gauge of practical availability.<sup>20</sup>

Table 1 shows the transit trip index value for each of the primary racial/ethnic groups. Asian or Pacific Islanders reside in areas with the highest values however, there is relative parity among all groups.

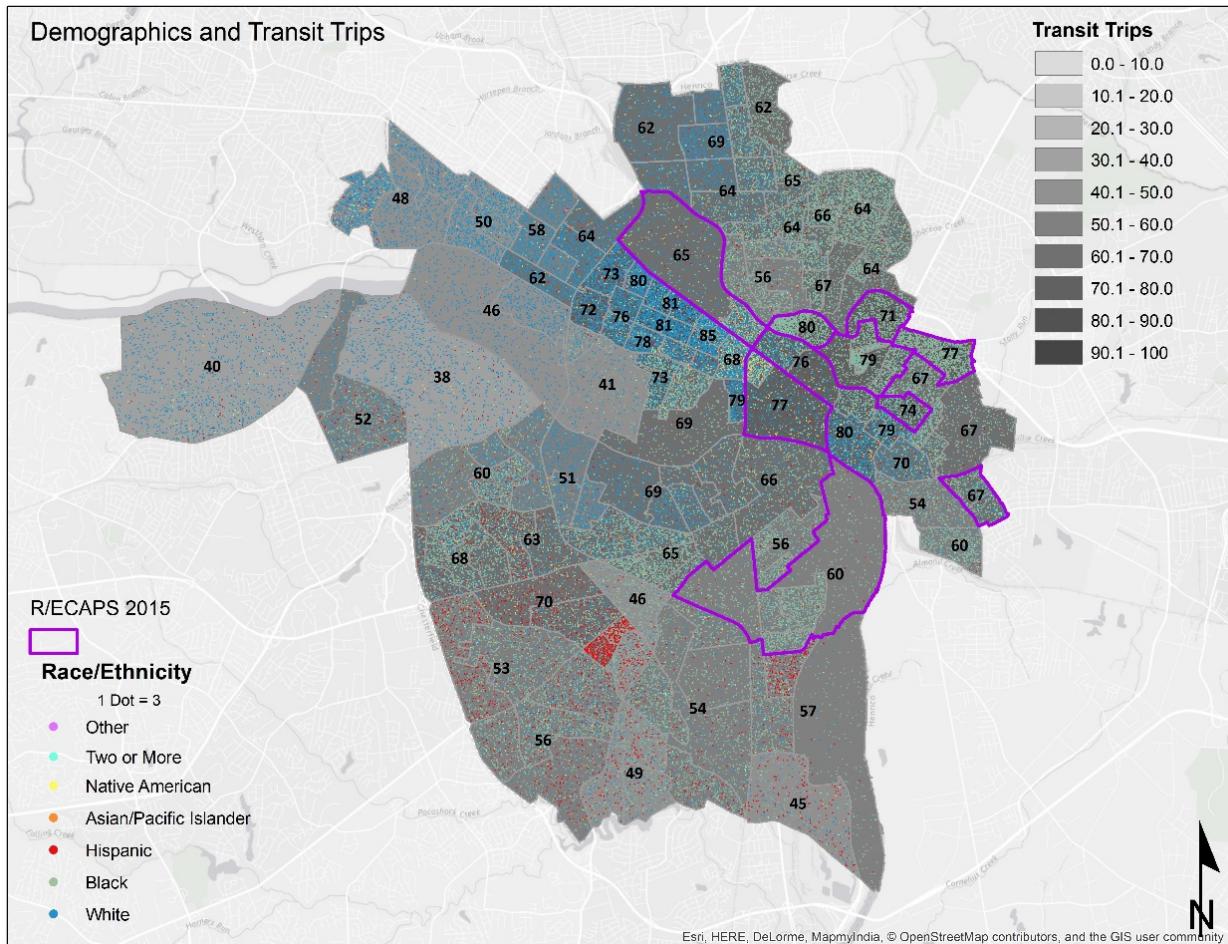
Table 1: Transit Trip Index; 2008-2012

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	Transit Index
<b>Total Population</b>	
White, Non-Hispanic	63.59
Black, Non-Hispanic	64.06
Hispanic	61.71
Asian or Pacific Islander, Non-Hispanic	69.02
Native American, Non-Hispanic	62.92
<b>Population below federal poverty line</b>	
White, Non-Hispanic	70.88
Black, Non-Hispanic	66.49
Hispanic	65.53
Asian or Pacific Islander, Non-Hispanic	73.25
Native American, Non-Hispanic	68.89

<sup>20</sup> U.S. Department of Housing and Urban Development. AFFH Rule Guidebook. Version 1, December 31, 2015.

Map 4 shows the transit trip index score and race/ethnicity. No area within the city appears to be excluded from using transit outright in the city. Transit trips are highest in the Fan, most likely due to the prevalence of student housing for Virginia Commonwealth University, and in those neighborhoods with public housing. Overall, it appears that public transportation is more frequently used in predominantly non-white areas of the city.

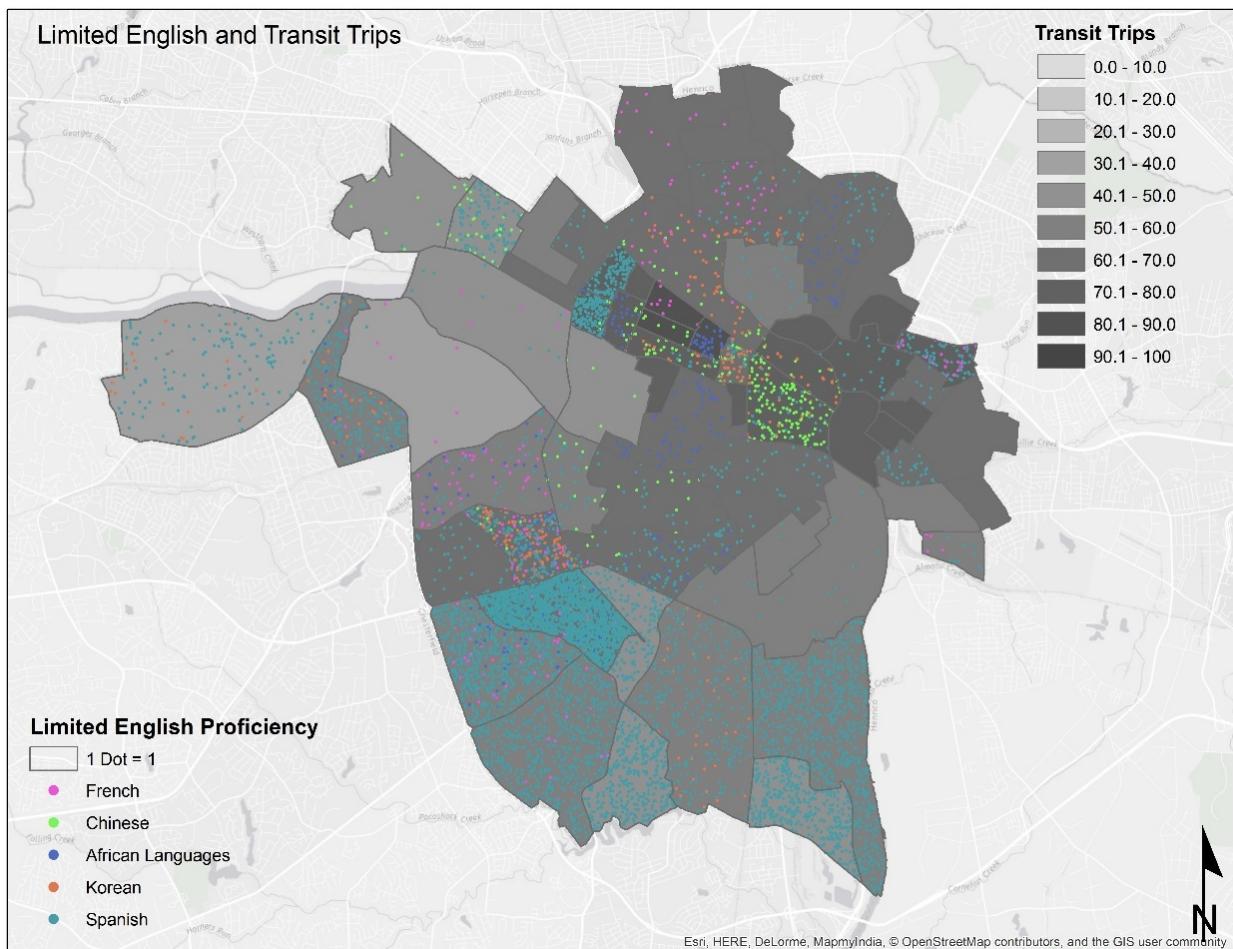
*Map 4: Demographics and Transit Trips; 2008-2012*



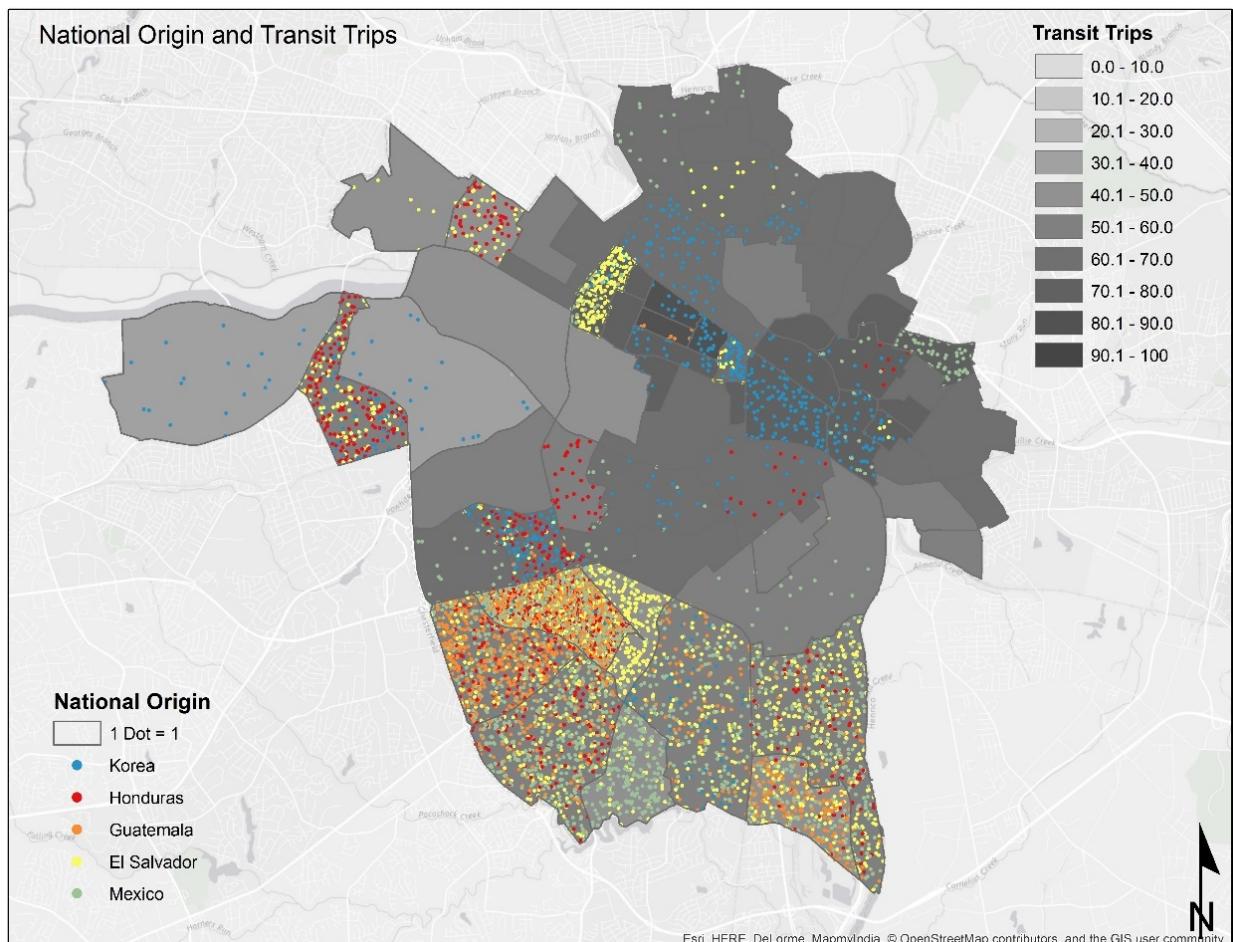
Map 5 shows transit trips and LEP individuals. Neighborhoods in the southern portion of the city where the majority of LEP Spanish speaking residents reside have slightly lower transit trip utilization scores but don't appear significantly lower than other groups. Based on conversations with community members, many Hispanic residents have access to a vehicle and don't overly rely upon public transportation. LEP Chinese and Korean speakers reside in neighborhoods with the highest public transit utilization.

Map 6 shows transit trips in relation to foreign-born residents. Residents hailing from Korea reside in areas with the highest transit trip values which roughly corresponds to the central business district. Additionally, the relative large number of Salvadorans in the near westend have higher than average access to transit.

Map 5: LEP and Transit Trips; 2008-2012

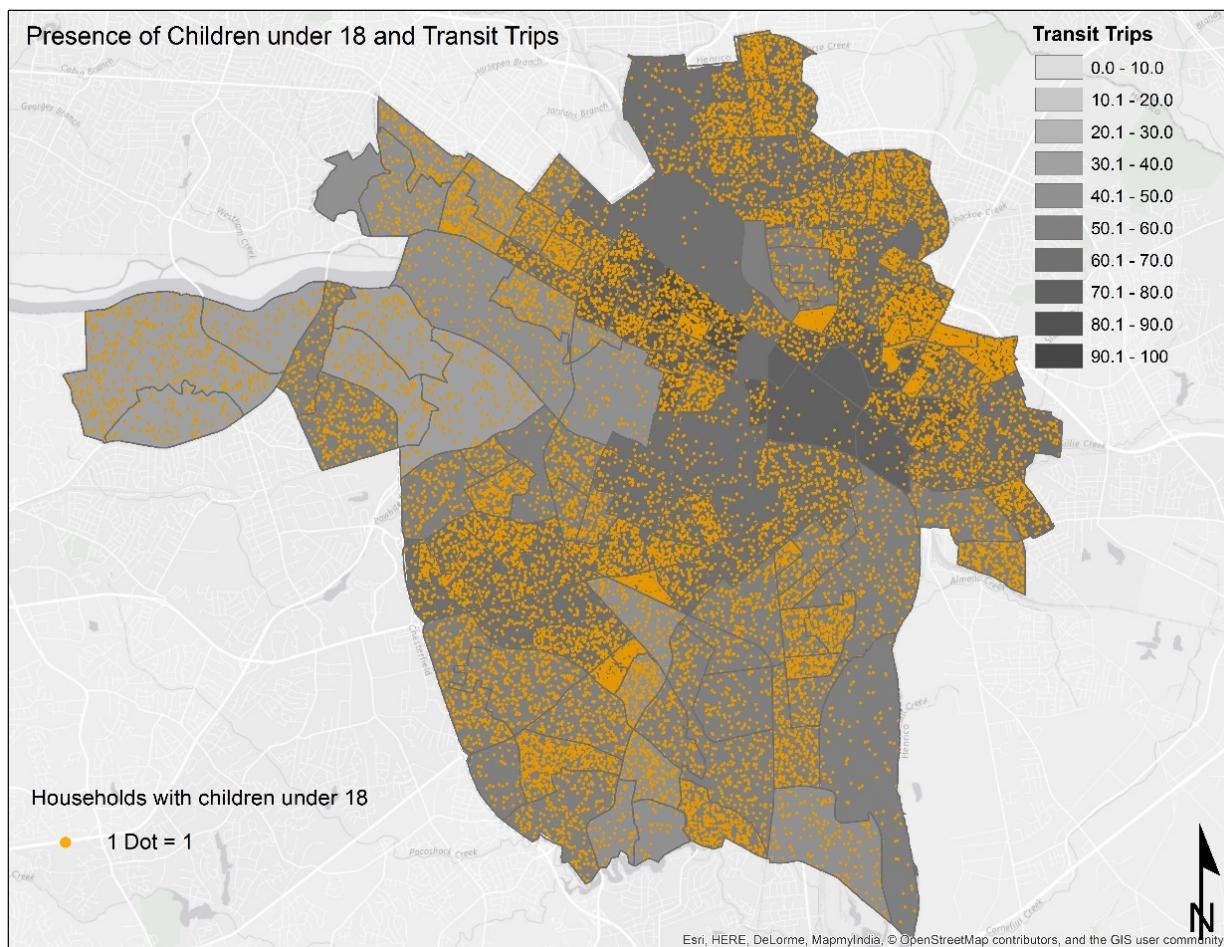


Map 6: National Origin and Transit Trips; 2008-2012



Map 7 shows transit trips and family households with children under 18. Family households with children appear to reside in areas with relatively high rates of transit utilization. Some of the areas with the highest transit trip utilization have very few families with children and some of the areas that have the lowest transit trip scores have relatively few families with children. Overall, access to public transit does not appear to be inhibited by residential location for families with children.

*Map 7: Family Households with Children and Transit Trips; 2008-2012*



The Low Transportation Cost index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters. The higher the value, the lower the cost of transportation in that neighborhood.<sup>21</sup> Table 2 shows the Low Transportation Cost Index values for each of the predominant racial/ethnic groups. As with the transit trip index values, there is relative parity among all the racial/ethnic groups with the exception being a slightly higher value (indicating a lower overall cost) for Asian or Pacific Islander residents. For the population below the federal poverty line there is a difference below the federal poverty line have slightly lower inde

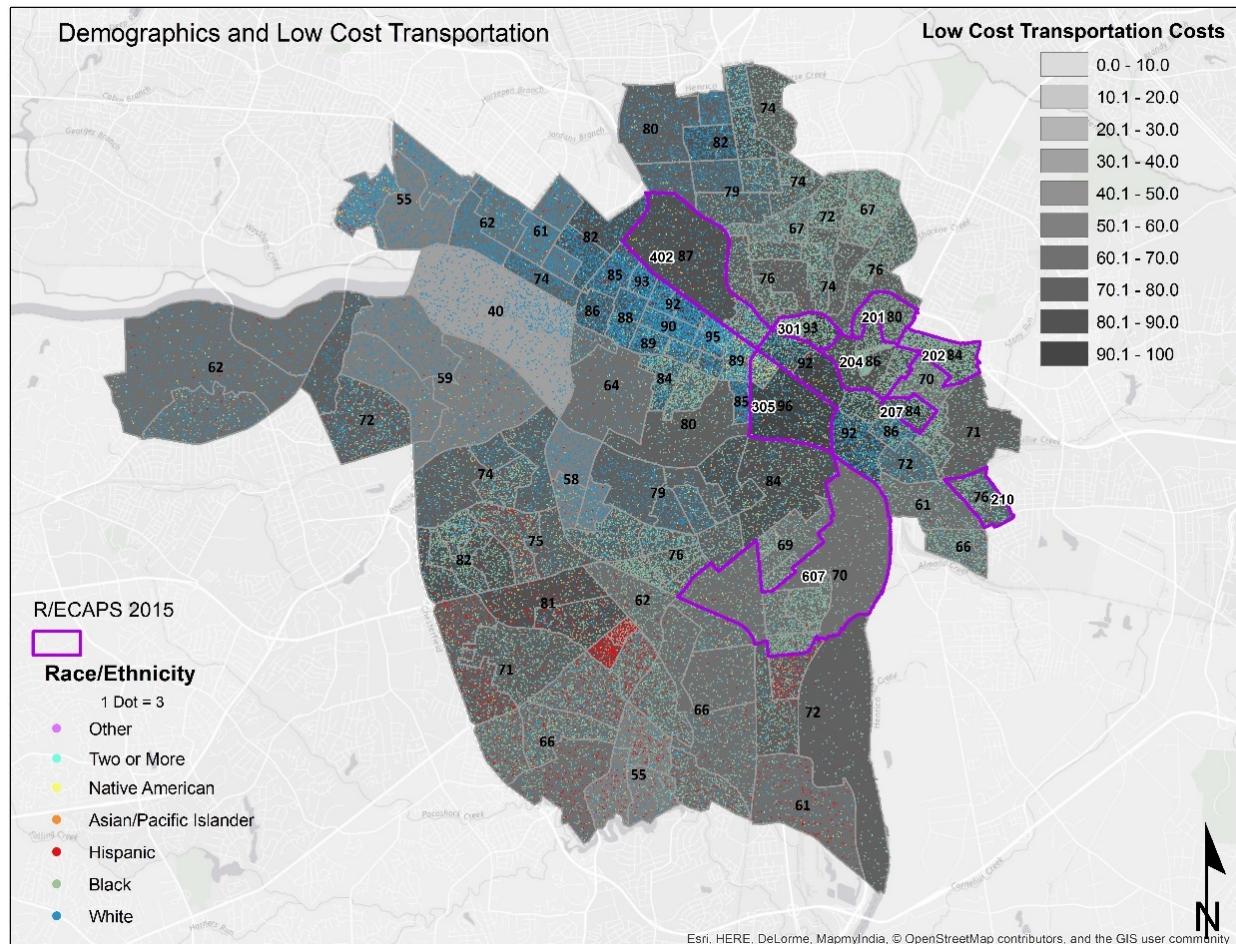
*Table 2: Low Transportation Cost Index; 2008-2012*

<b>(Richmond, VA CDBG, HOME, ESG) Jurisdiction</b>	<b>Low Transportation Cost Index</b>
<b>Total Population</b>	
White, Non-Hispanic	75.99
Black, Non-Hispanic	75.41
Hispanic	74.55
Asian or Pacific Islander, Non-Hispanic	84.14
Native American, Non-Hispanic	75.37
<b>Population below federal poverty line</b>	
White, Non-Hispanic	83.35
Black, Non-Hispanic	77.49
Hispanic	77.52
Asian or Pacific Islander, Non-Hispanic	89.04
Native American, Non-Hispanic	81.08

Map 8 shows the low transportation cost index in relation to race/ethnicity. The areas with the lowest transportation cost (highest score) are those neighborhoods in and around the Fan and near Westend, the central business district, and those R/ECAPs that contain public housing in the Eastend.

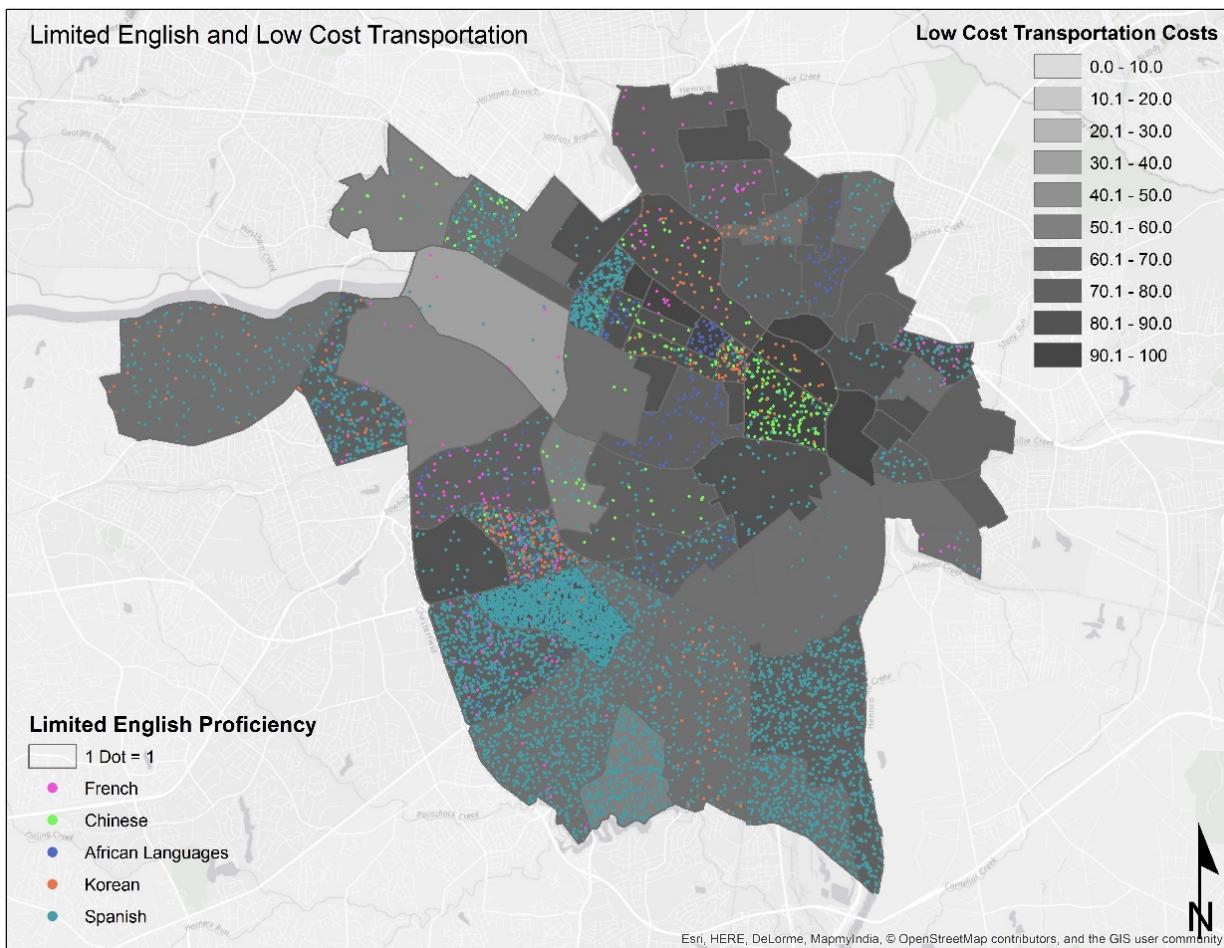
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*Map 8: Demographics and Low Transportation Cost; 2008-2012*



<sup>21</sup> HUD Office of Policy Development & Research. Affirmatively Furthering Fair Housing Tool (AFFH-T) Data Documentation. Data Version AFFHT0003. July 2017.

Map 9: LEP and Low Transportation Cost; 2008-2012

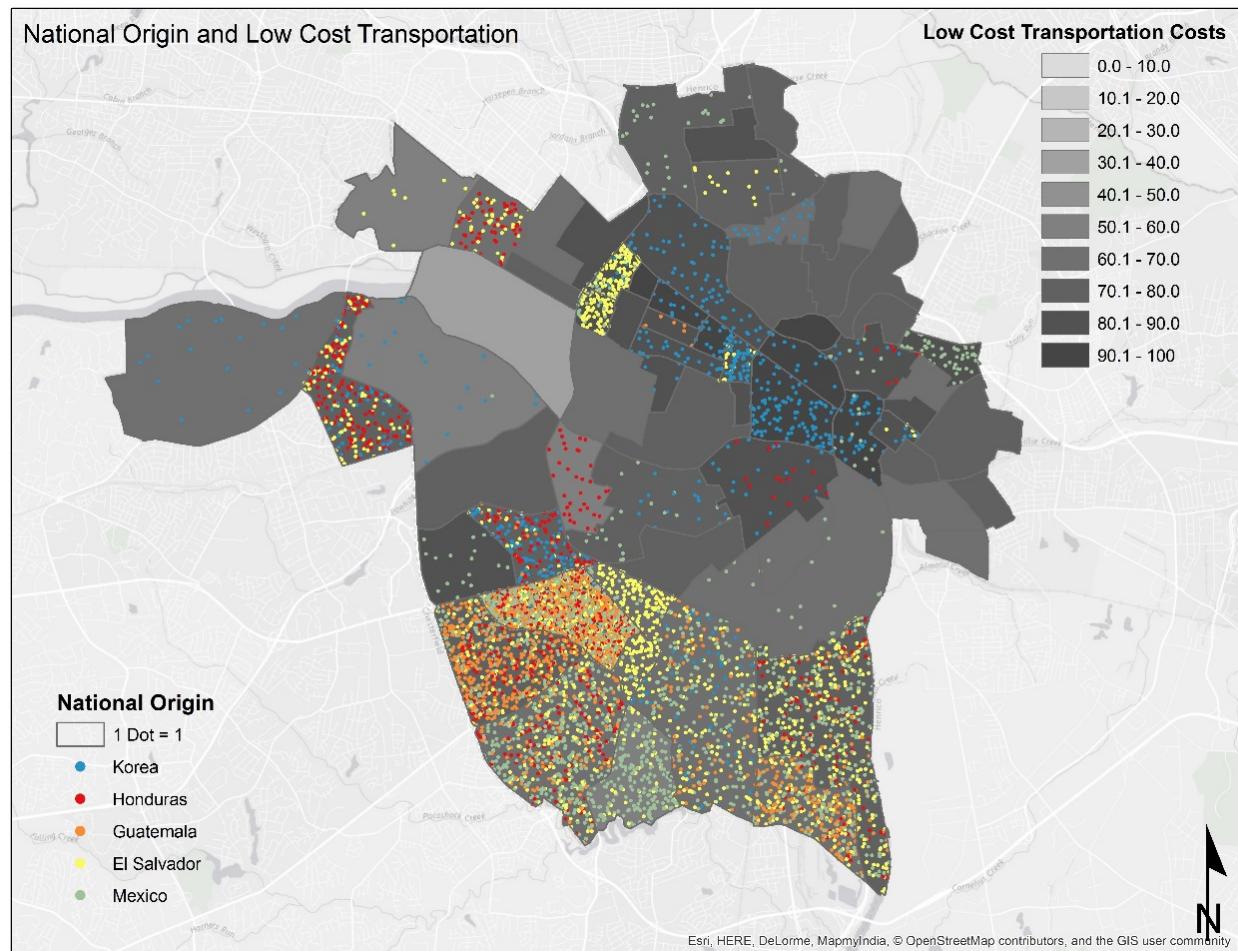


LEP residents do not appear to reside in areas of the city that overwhelmingly suffer from high transportation costs as evidenced in Map 9. The majority of LEP individuals that speak French, Chinese, various African dialects, or Korean reside in areas that have the lowest cost transportation in the city. Spanish speaking residents, due to their greater geographic dispersal throughout the city, reside in neighborhoods with a greater range of public transportation costs. However, overall there does not appear to be a disproportionate impact.

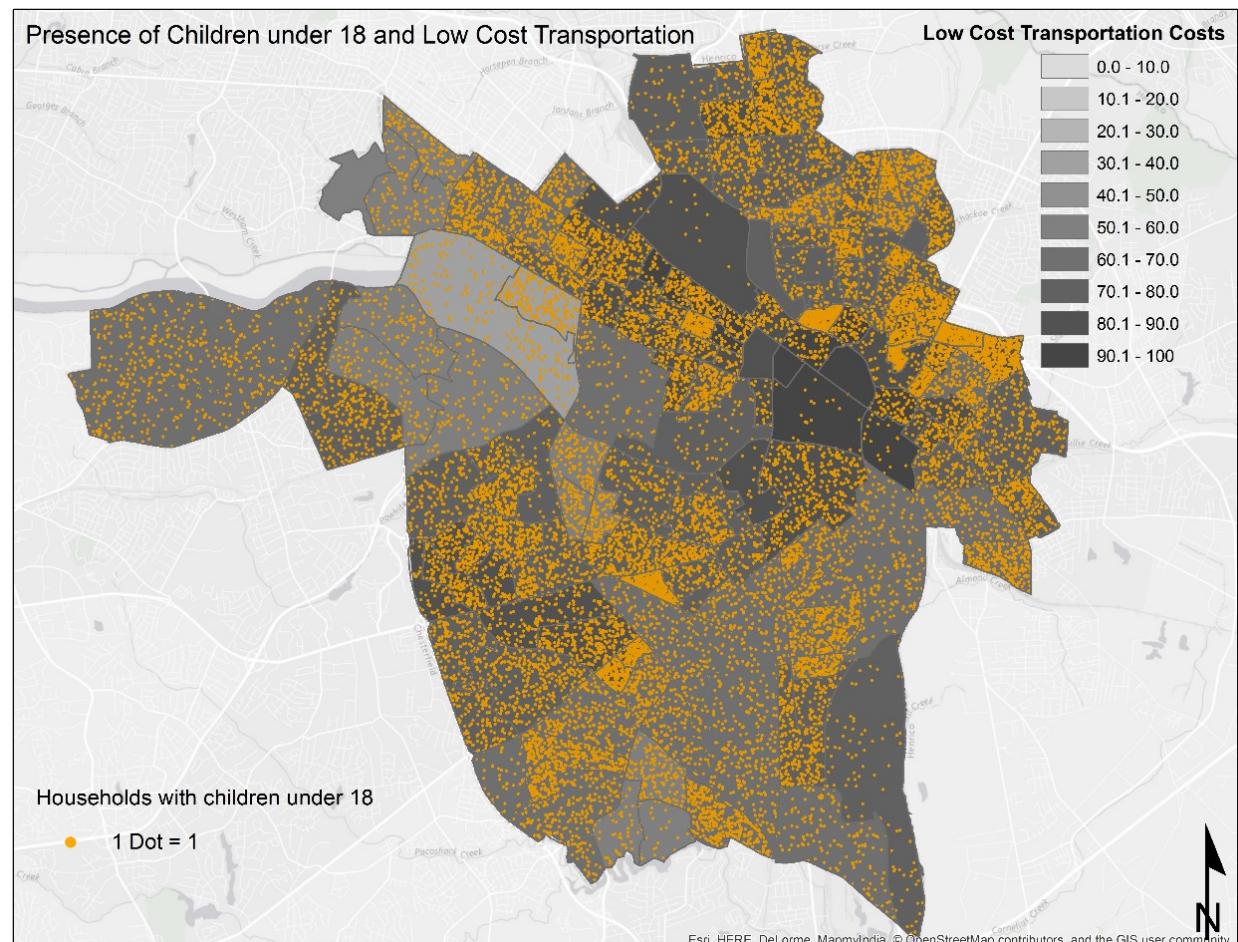
Map 10 shows the low transportation cost index in relation to foreign-born residents. Many residents from Korea reside in areas with relatively low public transportation costs. Residents from countries in central America, due to their spatial distribution, typically reside in areas having greater variations in public transportation costs though do not appear to be overly burdened. In short, the public transportation issue facing the city is not one of coverage within the city but of the failure to provide regional public transit infrastructure to ensure that residents have access to employment opportunities but also to housing opportunities.

Map 11 shows the location of family households with children under 18 and the low transportation cost index. Family households with children do not appear to be disproportionately impacted by high transportation costs.

Map 10: National Origin and Low-Cost Transportation; 2008-2012



Map 11: Family Households with Children and Low-Cost Transportation; 2008-2012



One of the priorities of the City's Master Plan is to achieve a more equitable distribution of affordable housing throughout the region.<sup>22</sup> The city provides a disproportionate share of the region's affordable housing. There are over 10,000 rental units affordable to persons earning 50% or less AMI located in Henrico and Chesterfield counties combined.<sup>23</sup> Unfortunately, those units do not meet the existing need for such housing. But even the possibility of accessing those units remains out of reach to persons who rely upon public transportation. If public transportation reached these communities, Richmond residents dependent upon public transit would have a wider variety of housing options available to them than currently exist.

The expansion of public transportation into the neighboring counties is a way to provide greater housing opportunities to residents through infrastructure that benefits all. There has been increased interest among business leaders as well as public officials in Chesterfield and Henrico Counties for regional transit in recent years as noted in the Mayor's Anti-Poverty Commission Report. Since the previous Analysis of Impediments to Fair Housing Choice was written, the most significant investment in public transportation in the Richmond region in decades has been made and is currently slated to go online in the coming months. The Greater Richmond Transit Company (GRTC) in partnership with the U.S. Department of Transportation, Virginia Department of Transportation and Department of Rail and Public Transportation, the City of Richmond, and Henrico County is set to begin operation of the GRTC Pulse, a modern, high quality, high capacity bus rapid transit system that will serve a 7.6-mile route bisecting the City east to west. This corridor will support 33,000 residents and 77,000 jobs within a half mile radius. Though far from a panacea to the lack of regional public transportation, it is nonetheless a step forward.

True regional public transportation remains years away from reality. However, there are some small steps that could be taken in the interim that could serve to increase the efficiency of existing transit service. Examining average one-way commute times per census tract shows that more than 25% of residents living in census tracts containing Richmond's largest public housing complexes have the longest commute times in the entire city in light of the fact that 80% of them work within the city boundaries.<sup>24</sup> Further exploring and working to resolve this issue would benefit these residents and could potentially result in some small cost savings for GRTC through efficiency gains.

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22 <http://www.richmondgov.com/planninganddevelopmentreview/documents/masterplan/08NhoodHousing.pdf>

23 2009 CHAS Data

24 Census Tracts 201, 204, and 301. American Community Survey, 2007-2011 5 year Estimates, Table B08105A

#### **d. Low Poverty Exposure Opportunities**

- i. Describe any disparities in exposure to poverty by protected class groups.*
- ii. What role does a person's place of residence play in their exposure to poverty?*
- iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?*
- iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.*

Federal housing policy and racial and class discrimination have effectively served to concentrate poverty in inner-cities across the country. Federal policy allocated the financial resources for urban renewal and the construction of public housing. Neighborhoods near newly constructed public housing experienced severe value depreciation and quickly became the bastion of affordable housing for low-income, predominantly black residents. The Federal Aid Highway Act of 1956 built over 41,000 miles of highways across the country and in doing so helped usher in the rise of suburban living while simultaneously decimating otherwise healthy black communities. To resist the U.S. Supreme Court ruling on Brown v. Board of Education which declared separate public schools for black and white students unconstitutional, white residents flocked to the newly constructed suburbs. "White Flight" as it came to be known was further propagated by the private real estate industry through practices long since outlawed such as blockbusting and steering.

Poverty is closely related to crime, untreated drug and alcohol addiction, family instability, depression, fear, low self-regard, health problems and shorter life expectancy. Children living in poverty face additional educational, social, emotional, and behavioral challenges. Ultimately, prolonged poverty results in social, political, and economic exclusion. This exclusion further exacerbates the challenges faced by individuals living in low-income communities.

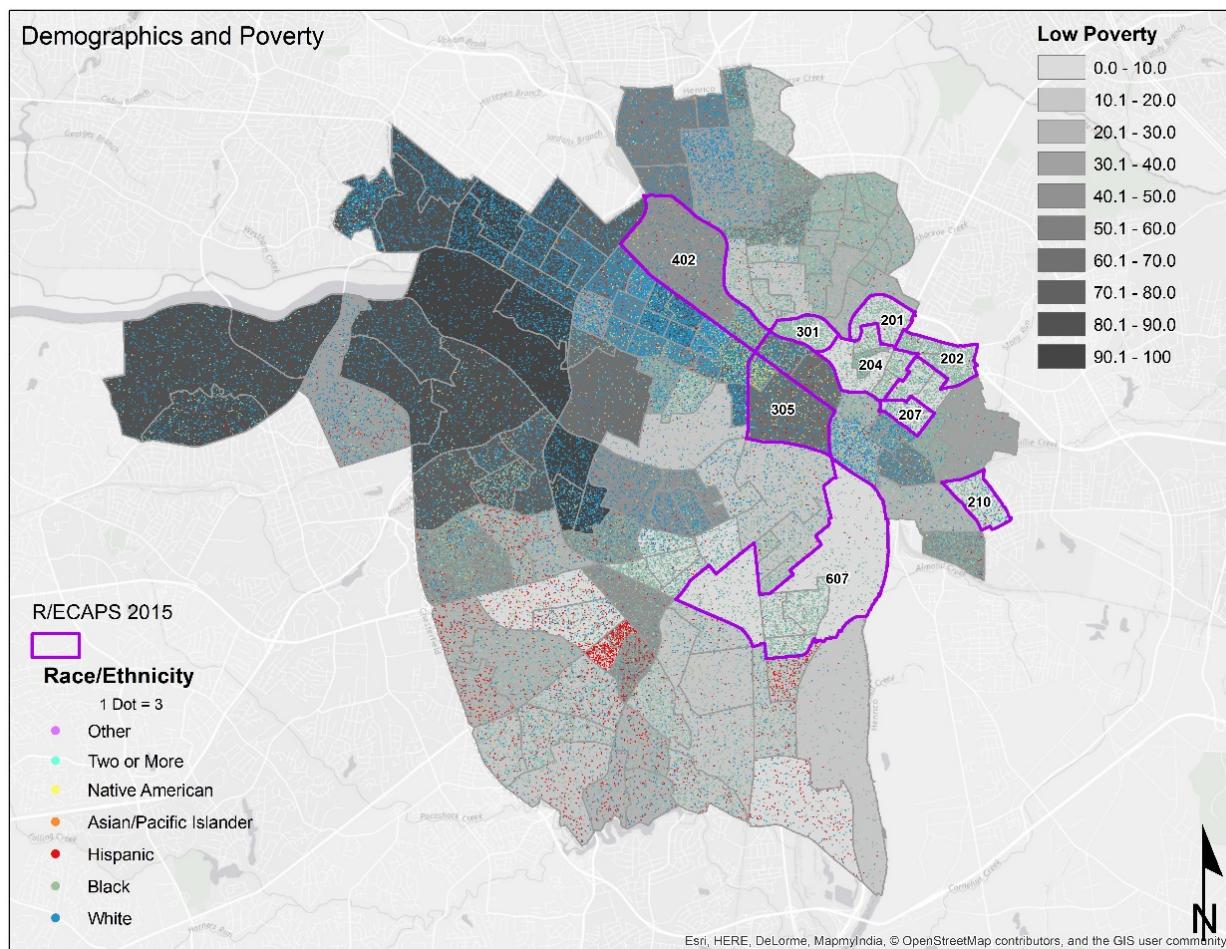
HUD provides a Low Poverty Index which measures the poverty rate by neighborhood; higher values indicate a higher likelihood that a family lives in a low poverty neighborhood. As the Table 1 shows, there are clear disparities in the low poverty index values dependent upon race/ethnicity. Non-Hispanic whites have a low poverty index score of 59.53 meaning they are the least likely group to be exposed to poverty. Conversely, non-Hispanic Black residents have a low poverty index score of 25.25 indicating that they are the racial/ethnic group most likely to be exposed to poverty. Hispanic residents are nearly equally exposed to poverty as non-Hispanic black residents, while Asian or Pacific Islander residents fall in between the two extremes.

*Table 1: Low Poverty Index; 2009-2013 5-Year Estimates*

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index
<b>Total Population</b>	
White, Non-Hispanic	59.53
Black, Non-Hispanic	25.25
Hispanic	27.99
Asian or Pacific Islander, Non-Hispanic	54.32
Native American, Non-Hispanic	35.64
<b>Population below federal poverty line</b>	
White, Non-Hispanic	48.49
Black, Non-Hispanic	18.20
Hispanic	21.50
Asian or Pacific Islander, Non-Hispanic	52.31
Native American, Non-Hispanic	19.53

Map 1 shows the low poverty index overlaid with race/ethnicity. The correlation between high poverty and the residential location of Black residents, and white residents and low poverty areas of the city is obvious. White residents predominate the population in those neighborhoods that have among the

Map 1: Demographics and Low Poverty; 2009-2013 5-Year Estimates

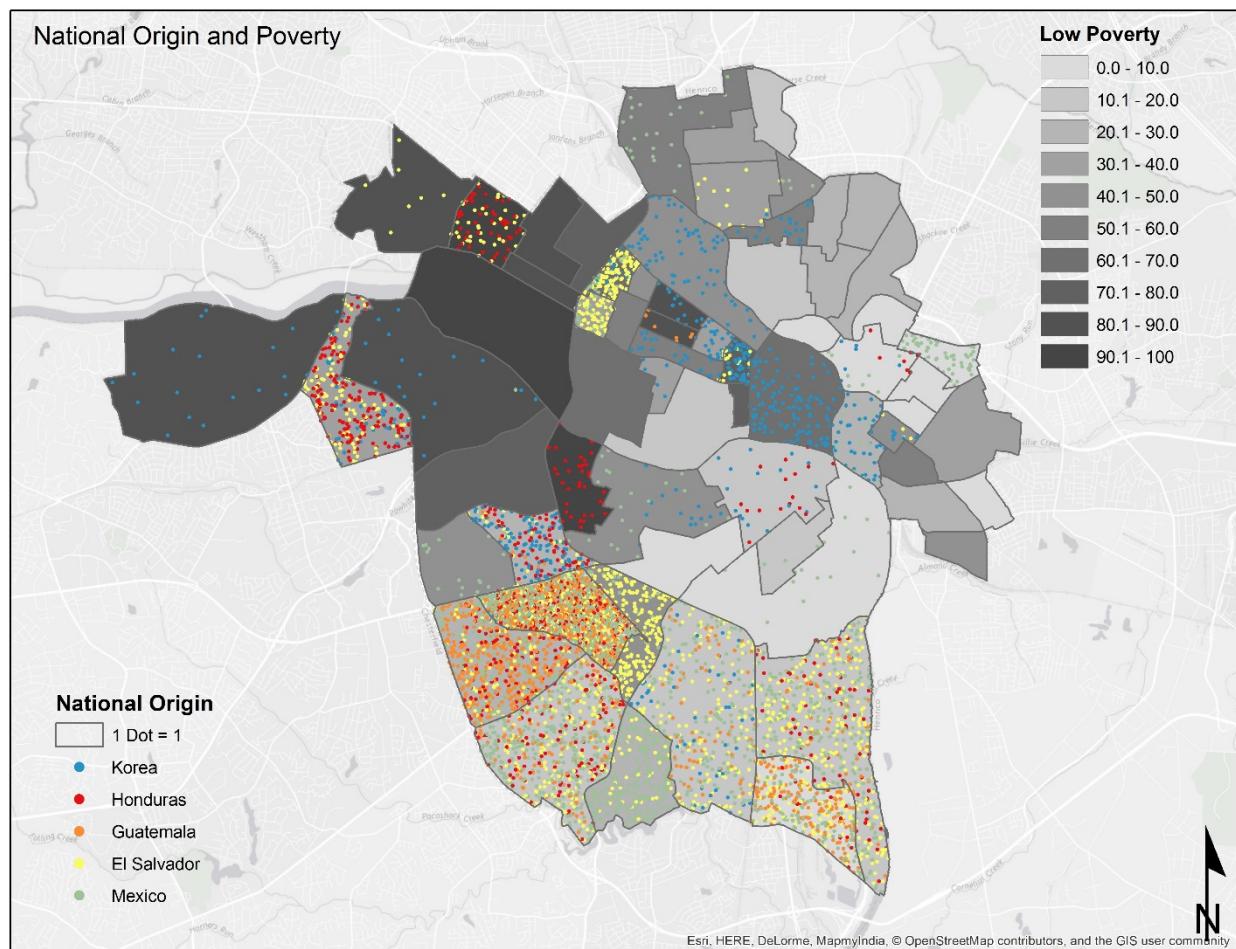


lowest poverty rates in the city while black residents account for most of the population in high poverty neighborhoods. 62% of white residents reside in neighborhoods with a low poverty index score of 50 or more, compared to 13.4% of blacks, 16.3% of Hispanics, and 58.8 % of Asian or Pacific Islanders.

Within R/ECAPs the disparity is even more significant. Just 5.5% of Non-Hispanic whites in the city reside in R/ECAP tracts compared to 21.7% of Blacks, and 5.4% of Hispanics. In total, 14.3% of the city's population reside in an area of concentrated racial and/or ethnic poverty. As stated previously, 76.05% of the total population within R/ECAPs is Black.

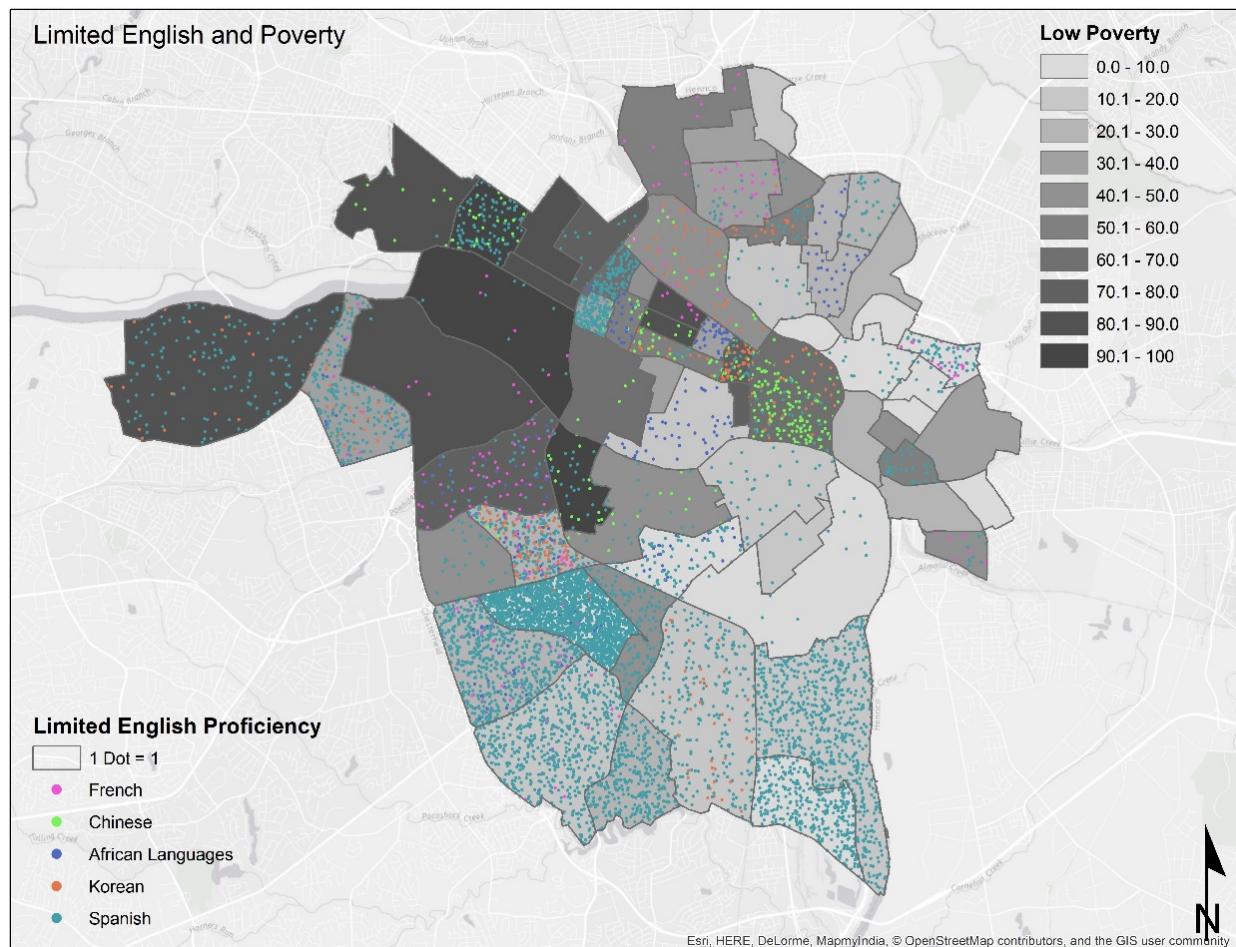
Map 2 shows where foreign-born residents from the five most common countries reside within the city and in relation to the low poverty index. Not surprisingly, and with few exceptions, the bulk of foreign-born residents reside in areas with greater exposure to poverty than do their white counterparts. In fact, just 6.4% of residents from these five countries live in neighborhoods with a low poverty index score of 50 or more. Of the five countries, Korean residents (21.6%) are the most likely to reside in a neighborhood with a low poverty index score above 50; 11.2% of residents from El Salvador, 9.8% of residents from Honduras, 2.2% from Mexico, and just .5% from Guatemala reside in neighborhoods with a low poverty index score above 50.

Map 2: National Origin and Low Poverty; 2009-2013 5-Year Estimates



The same disparities extend to LEP residents though with some variations corresponding to residential location as shown in Map 3. Eighty-four percent of residents LEP Chinese speakers (289 total) reside in neighborhoods with low poverty index scores 50 or greater, 36.8% of French speakers (228 total) and 34.6% of Korean speakers (353 total) reside in similar neighborhoods. Eighteen percent of residents speaking various African languages (308 total) and just 8.6% of Spanish speaking residents (6,537 total) reside in neighborhoods with low poverty index scores of 50 or more. In total, 13.9% of residents speaking these five dialects reside in neighborhoods with low poverty index scores of 50 or more. LEP Spanish speaking residents disproportionately reside in high poverty neighborhoods.

Map 3: LEP and Low Poverty; 2009-2013 5-Year Estimates



Map 4 shows the location of family households with children under the age of 18 in relation to the low poverty index. Though it is difficult to discern a visual relationship from this map, the underlying data highlights an issue of grave concern. Twenty-six percent of families with children reside in neighborhoods with low poverty index scores of 50 or more. Just under three-quarters of the city's children reside in neighborhoods with low poverty index scores less than 50. Beyond the serious consequences of growing up in poverty such as toxic stress which can lead to lifelong physical and mental health problems, educational performance is greatly undermined.<sup>25</sup>

Research indicates that the role of neighborhood environment during childhood is a key determinant of educational performance, and thus a child's long-term success.<sup>26</sup> In short, the implications of growing up

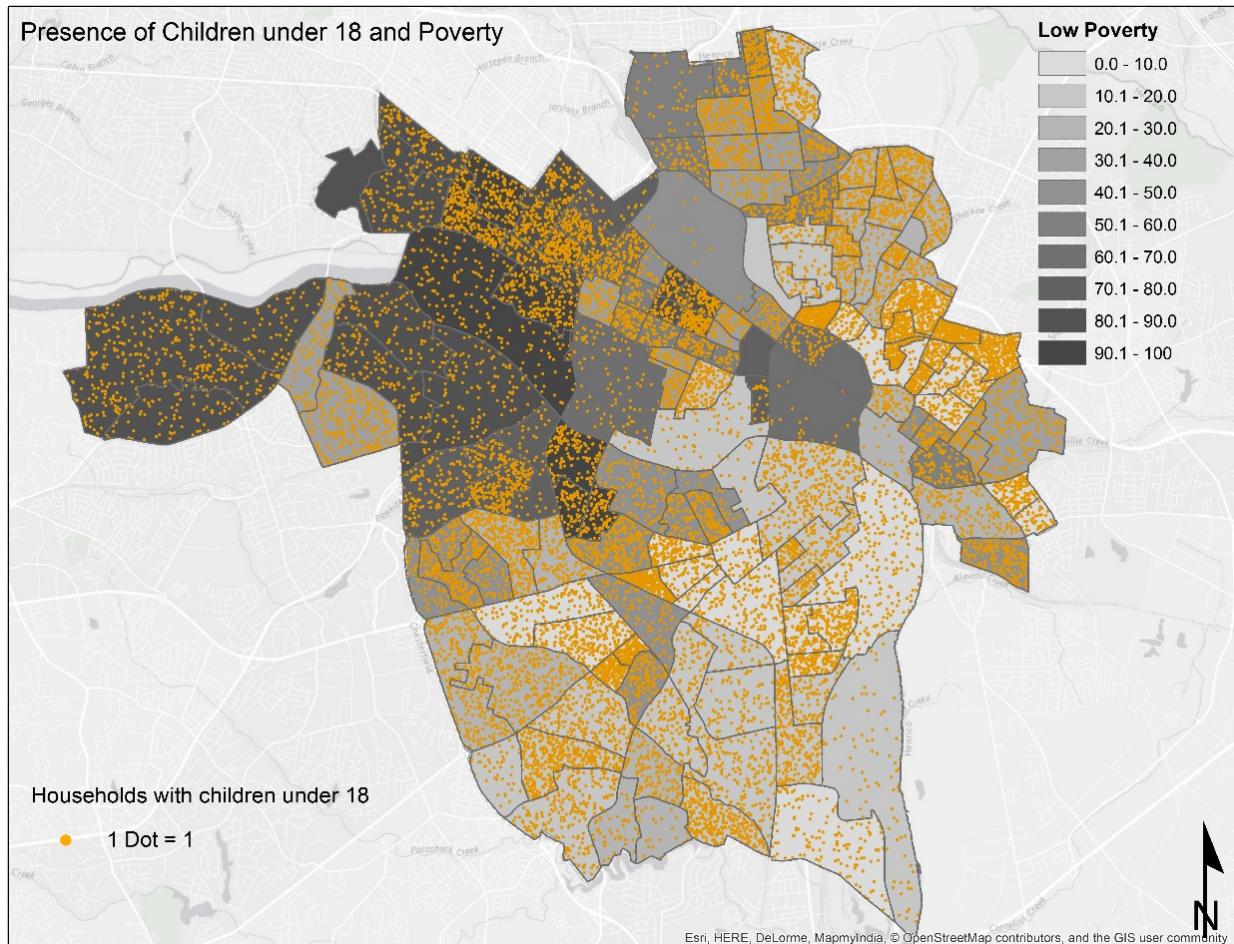
<sup>25</sup> Kleiner, Sarah and Demeria, Katie. Richmond's 39 percent childhood poverty rate is more than twice that of all Virginia, according to study. Richmond Times Dispatch. June 20, 2016.

[http://www.richmond.com/news/virginia/richmond-s-percent-child-poverty-rate-is-more-than-twice/article\\_81ddabbe-f84d-5ef0-aa35-d7a2aed3a19d.html](http://www.richmond.com/news/virginia/richmond-s-percent-child-poverty-rate-is-more-than-twice/article_81ddabbe-f84d-5ef0-aa35-d7a2aed3a19d.html)

<sup>26</sup> Chetty, Raj and Hendren, Nathaniel. The Impacts of Neighborhoods on Intergenerational Mobility. Executive Summary. Harvard University. April 2015. [http://www.equality-of-opportunity.org/assets/documents/nbhds\\_exec\\_summary.pdf](http://www.equality-of-opportunity.org/assets/documents/nbhds_exec_summary.pdf)

in poverty are significant. Although teachers, schools, and districts can have an impact, factors at the student level drive individual performance. Concentrations of poverty result in school districts with higher concentrations of poverty than even the surrounding neighborhoods. Children in these circumstances require more guidance and support, placing more responsibilities on teachers in high poverty districts.

*Map 4: Family Households with Children and Low Poverty; 2009-2013 5-Year Estimates*



### e. Environmentally Healthy Neighborhood Opportunities

- i. *Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.*
- ii. *Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?*

Minority neighborhoods have long been more likely to be located near environmental hazards, pollution and noxious activity. Evidence shows that this remains true regardless of class, suggesting it is not income alone that relegates minority communities to live in neighborhoods with higher levels of toxin exposure. Rather it is the combination of economic and political isolation prevalent in minority communities.

Environmental justice is the movement against such inequality and is based on the theory that all people, regardless of race and class, have the right to live in a healthy and safe environment.

Environmental hazards continue to be found largely in minority communities as unequal geographies tend to persist. That is, regardless of progress in the law and action addressing environmental injustices, it takes time and resources for individuals to move to better neighborhoods, for polluting facilities to be better regulated, and for past hazards to be safely removed.

HUD provides data related to the environmental health of neighborhoods in the form of the Environmental Health Index. This index summarizes potential exposure to harmful toxins at the neighborhood level. The higher the value, the less exposure to toxins harmful to human health. Thus, the higher the value, the better the environmental

quality of a neighborhood. Table 1 shows the environmental health index values for each of the predominant racial/ethnic groups. Overall, no neighborhood within the city is free from the effects of harmful toxins. The highest environmental health index value found in the city is 40 and the lowest is zero; the scale ranges from 0 to 100. Asian or Pacific Islanders live in neighborhoods with index value of 14.88 which is the lowest of any racial/ethnic group. Hispanics live in neighborhoods with an index value of 25.36 which is the highest value of any group indicating slightly healthier neighborhoods.

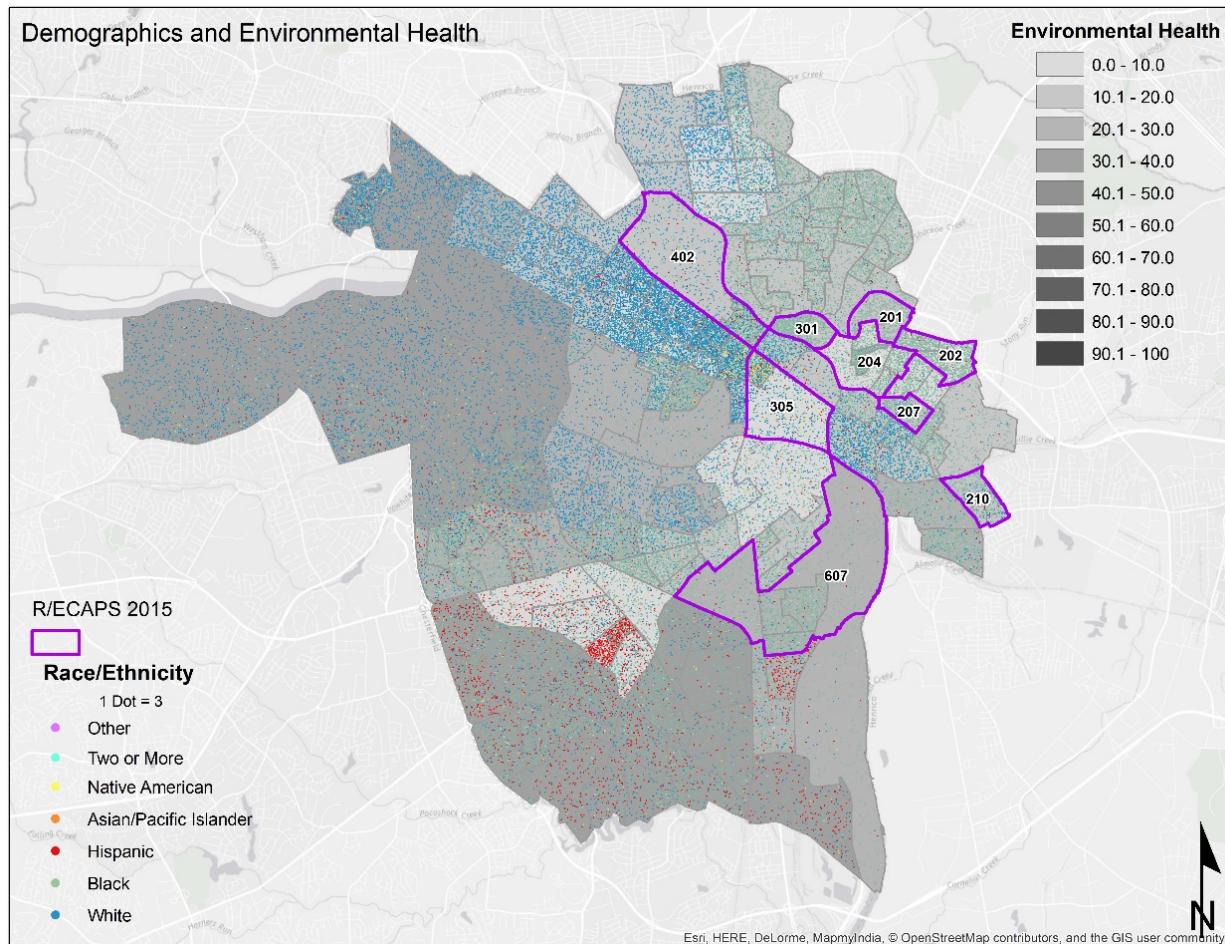
Table 1: Environmental Health Index; 2011

(Richmond, VA CDBG, HOME, ESG) Jurisdiction	Environmental Health Index
<b>Total Population</b>	
White, Non-Hispanic	19.84
Black, Non-Hispanic	20.48
Hispanic	25.36
Asian or Pacific Islander, Non-Hispanic	14.88
Native American, Non-Hispanic	21.83
<b>Population below federal poverty line</b>	
White, Non-Hispanic	14.31
Black, Non-Hispanic	19.03
Hispanic	21.83
Asian or Pacific Islander, Non-Hispanic	12.31
Native American, Non-Hispanic	20.38

Map 1 shows the race/ethnicity of the city in relation to the environmental health index. Forty-three percent of city residents reside in neighborhoods with an environmental health index score of 20 or more, the healthiest of neighborhoods within the city. Forty percent of the city's non-Hispanic white residents reside in such neighborhoods, as do 45% of blacks, 54 % of Hispanics, and 25% of Asian or

Pacific Islanders. All but one R/ECAP, tract 607, have environmental health index values of less than 20 indicating that they are below the median value in terms of environmental health.

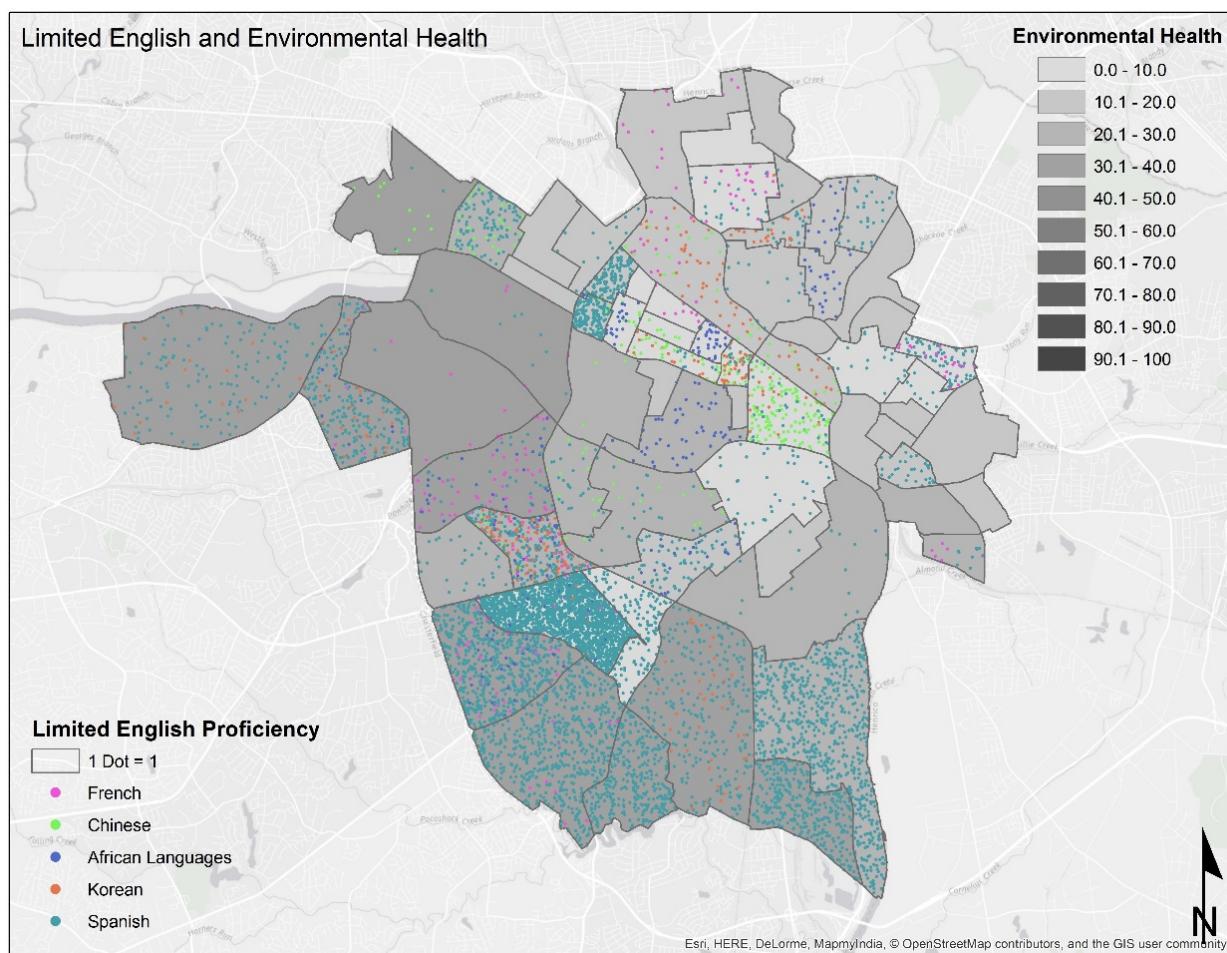
*Map 1: Demographics and Environmental Health; 2011*



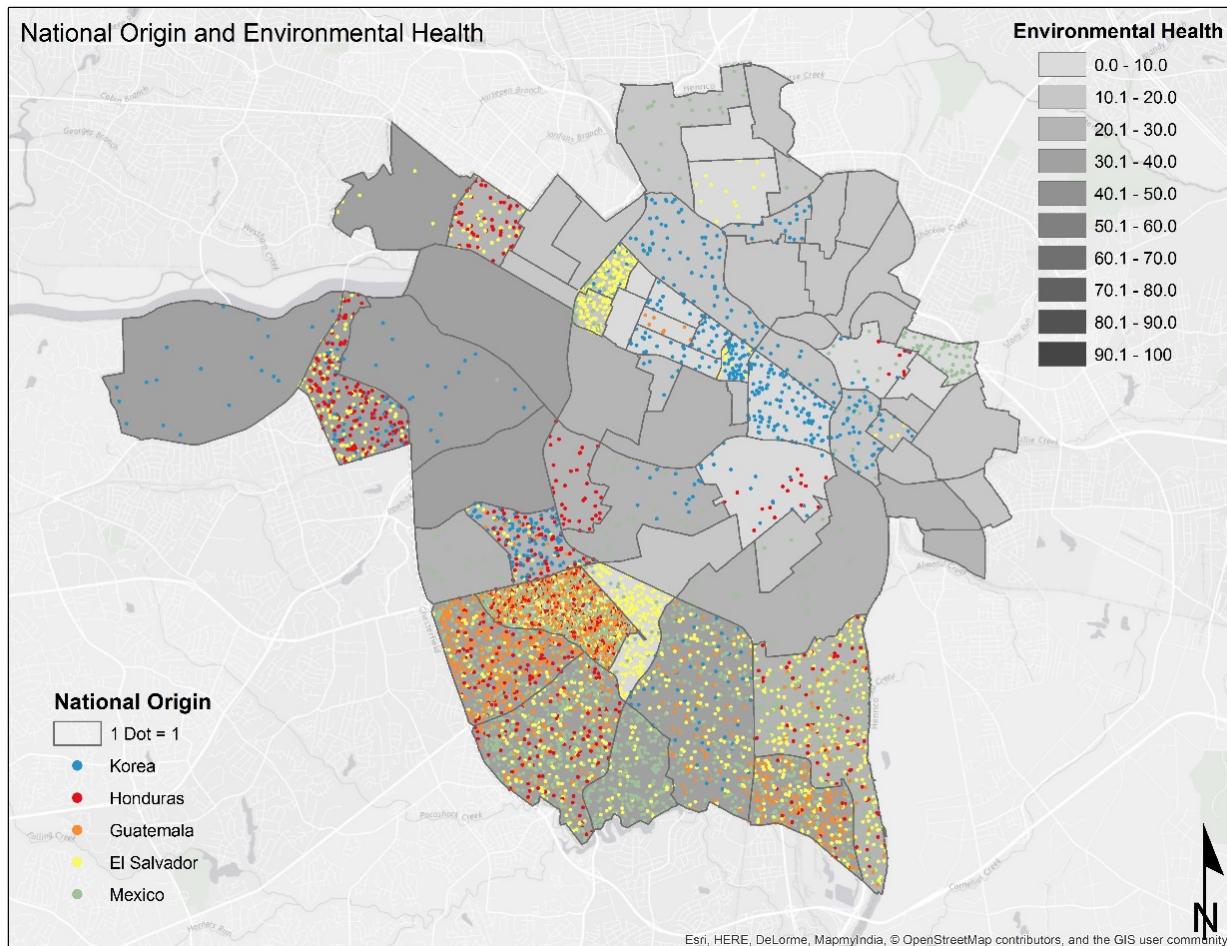
Map 2 shows the relationship between LEP individuals and environmental health. Forty-six percent of LEP individuals reside in neighborhoods with an environmental index score of 20 or less. Seventy-five percent of LEP Chinese speakers reside in neighborhoods with environmental index scores of 20 or less as do 51% of LEP African language speaking residents, 45% of LEP Spanish speaking residents, 44% of LEP Korean speaking residents, and 38% of LEP French speaking residents. Excepting the generally poor neighborhoods which the majority of LEP Chinese speaking residents live in, no glaring disparities exist in the LEP population accessing environmentally healthy neighborhoods as there simply aren't neighborhoods that are dramatically healthier than others.

Map 3 shows the location of foreign-born residents from the most common countries. Forty-five percent of foreign-born residents from these five countries live in neighborhoods with environmental index scores less than 20. Foreign-born residents from Korea have the highest percentage of residents living in such neighborhoods at 61%, 49% of Guatemalans, 45% of Mexicans, 43% of Salvadorans, and 34% of Hondurans reside in neighborhoods with environmental index scores less than 20. Again, due to the generally low levels of environmental health across the city, there don't appear to be disparities related to the inability of the foreign-born population from accessing healthier neighborhoods.

Map 2: LEP and Environmental Health; 2011

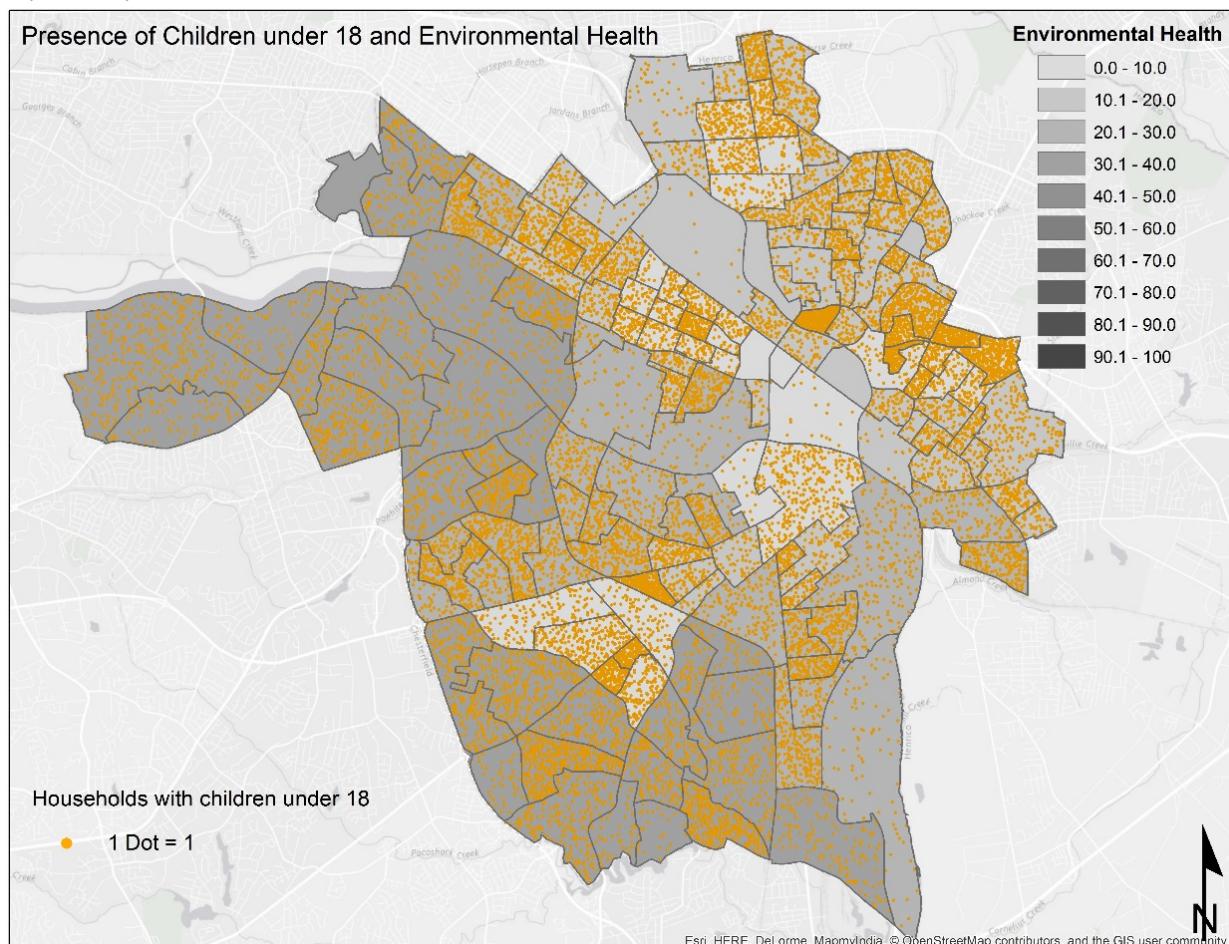


Map 3: National Origin and Environmental Health; 2011



Map 4 shows the location of family households with children and environmental health. Fifty-one percent of families with children reside in neighborhoods with environmental index scores of less than 20.

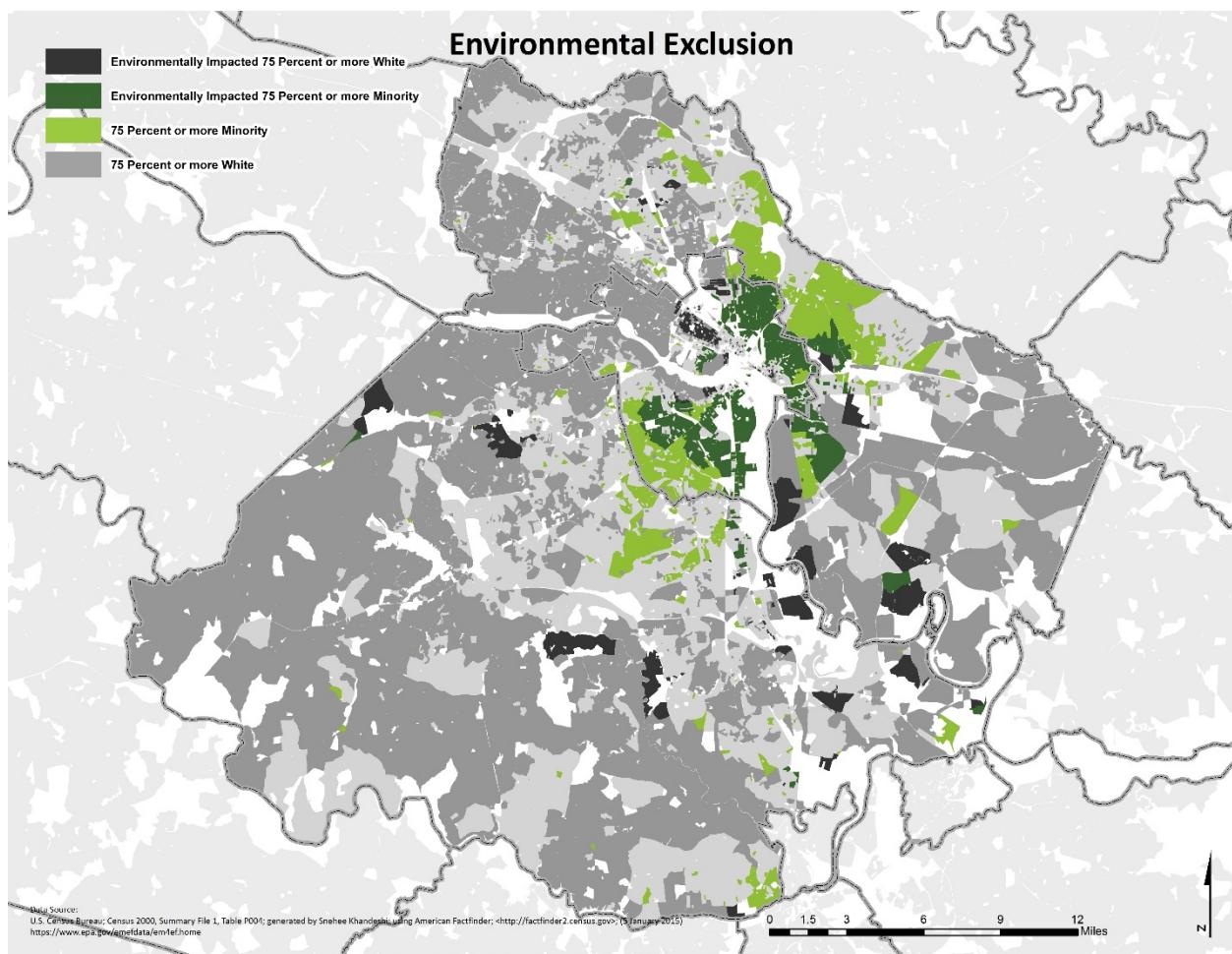
*Map 4: Family Households with Children and Environmental Health; 2011*



Of additional interest to the topic of environmental health is a report published by Housing Opportunities Made Equal of Virginia (HOME) in 2016 which included sections on environmental and health disparities in the Richmond Region. The report examined disparities experienced by members of hyper-segregated minority and white neighborhoods across numerous variables such as income, environmental hazards, and access to credit experienced.

Map 5 shows the location of segregated minority and white neighborhoods that are impacted by environmental health hazards. These hazards include such things as point source air and water site, superfund sites, landfills, incinerators, and waste treatment plants. Of importance are the black shaded areas which indicate segregated white neighborhoods which are environmentally impacted and the dark green areas which represent environmentally impacted segregated minority areas. The report found that in total 32% of minorities in segregated minority communities live in close proximity to an environmental health hazard compared to just 4% of white residents residing in segregated white neighborhoods.

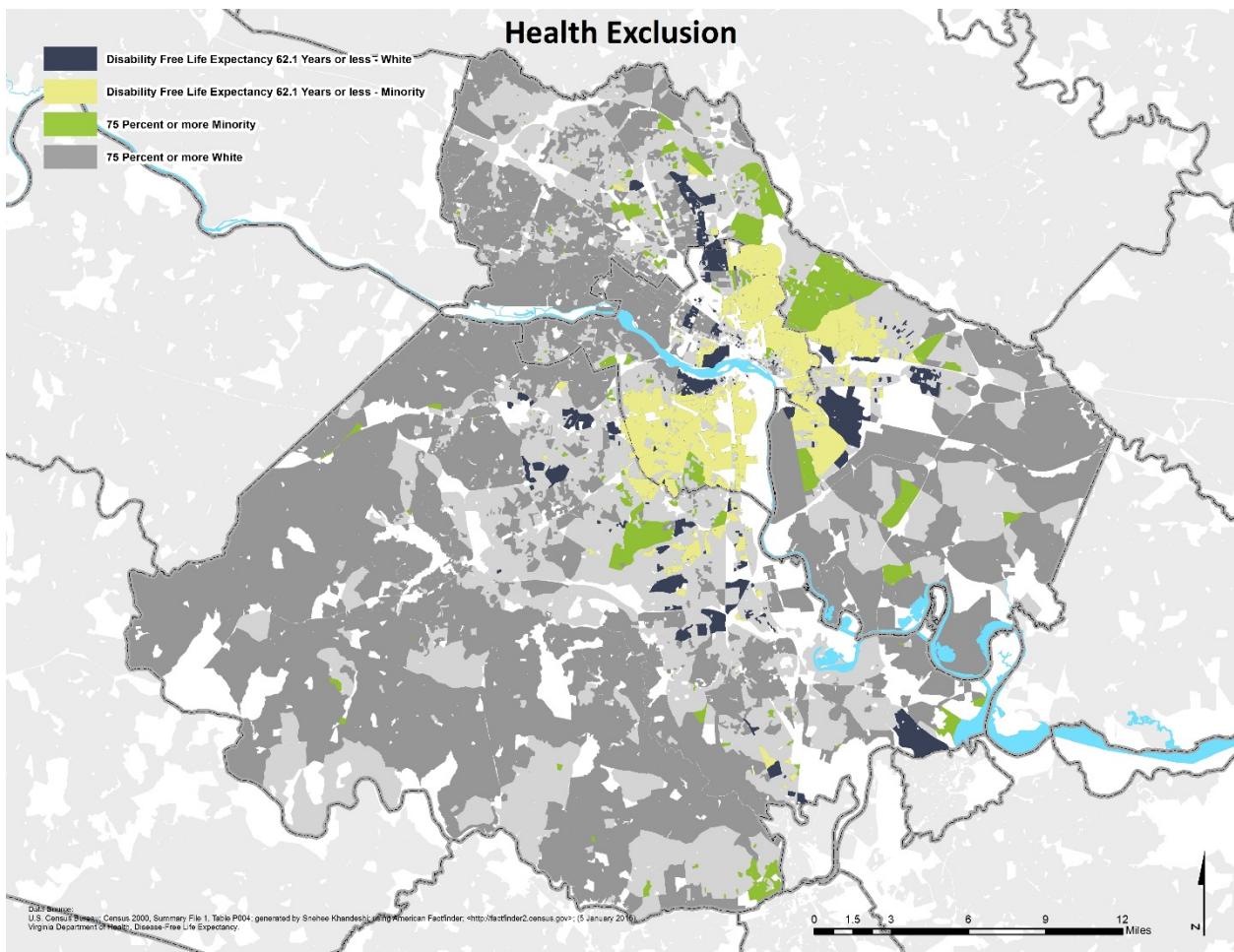
Map 5: Environmental Exclusion; 2014



Environmental health, along with neighborhood safety, housing quality, and access to quality employment is one of the primary social determinants of health. The HOME report also included analysis of the disability life expectancy of neighborhoods. This measure is calculated by the Virginia Department of Health as part of their Health Opportunity Index (HOI). Essentially, the HOI is a measure of the age at which a person, because of a related disability, is no longer able to enjoy the same quality of life.

Map 6 shows the relationship between hyper-segregated minority and white areas of the Richmond region and their estimated disability-free life expectancy. Regionally, the average disability-free life expectancy is 62.1 years of age. The dark blue shaded areas are hyper-segregated white neighborhoods that have a disability free life expectancy of 62.1 years or less; the lime green colored areas are hyper-segregated minority neighborhoods that have a disability-free life expectancy of 62.1 years or less. The report found that 71% of minorities living in segregated minority communities have a disability free life expectancy 62.1 years or less compared to just 9% of whites living in segregated white communities.

Map 6: Health Exclusion; 2015



## f. Patterns in Disparities in Access to Opportunity

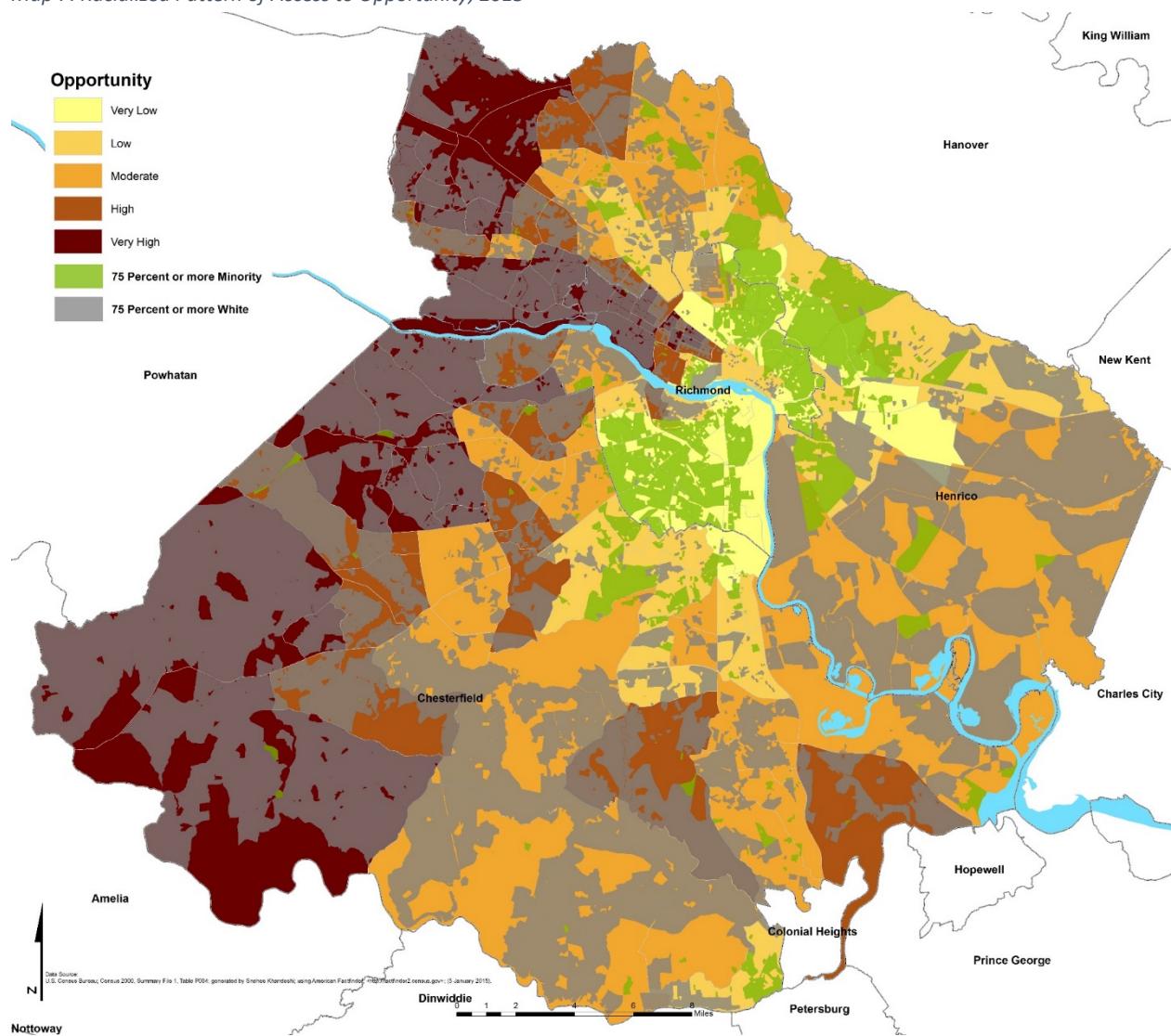
*i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.*

The principal overarching pattern of access to opportunity and exposure to adverse community factors based on race/ethnicity can be best described as the racialized economic and social exclusion of minorities from accessing essentially all opportunity factors but principally, and arguably most detrimentally: wealth, housing, and education. All three of the opportunity factors are inextricably woven together.

Several years ago, Housing Opportunities Made Equal of VA, Inc published a report on opportunity in the Richmond Region. The opportunity map that it created for the report was based on 22 various socio-economic indicators including many of the ones examined in the analysis above. In summary, the report found that residential location plays an important role in determining access to opportunity. Several years later HOME released the findings of a report focused on community exclusion. Community exclusion is the result of discriminatory decisions, policies, and practices compounded over time and

layered over geography. This report analyzed exclusion through the lens of residential segregation. Map 7 shows the opportunity map showing areas of opportunity overlayed by the residential segregation map from the Excluded Communities project. This map shows the vast disparities in opportunity experienced between segregated Minority and White neighborhoods in the Richmond region.

*Map 7: Racialized Pattern of Access to Opportunity; 2013*



Within the city, there is little argument that R/ECAP neighborhoods, particularly those with public housing, have among the lowest access to opportunity and among the greatest exposure to adverse factors in the city. Close behind, if not equal, or even worse in some factors, are many of the neighborhoods predominated by Hispanics in the Southside. Though many of these neighborhoods suffer from the same issues, residents have additional challenges such as limited English proficiency and documentation, both of which serve to further isolate these communities.

### **3. Contributing Factors of Disparities in Access to Opportunity**

**Contributing Factor:** Racial discrimination

**Prioritization:** High

**Justification:**

It is easiest to understand disparities in access to opportunity in its most basic form – that the cumulative effects of prolonged racial discrimination have created a landscape in which white residents, through a variety of mechanisms – most notably income and corresponding wealth – have access to the best educational opportunities, health care, employment, and housing options, and neighborhoods. The result is that minorities – predominantly Black and Hispanic – live in neighborhoods with poorer quality housing, access to underperforming and unhealthy schools, and constrained employment options.

**Contributing Factor:** The economic and social isolation of segregated black neighborhoods – the entrenched cycle of poverty – restricts housing choice.

**Prioritization:** High

**Justification:**

Poverty directly impacts numerous variables including educational performance, all manner of health factors including physical and mental, exposure to crime, violence, and diminishes civic engagement. Housing alone simply does not resolve the collective harm imposed on households living in poverty.

**Contributing Factor:** State support for public education disproportionately impacts predominantly minority school districts.

**Prioritization:** Moderate

**Justification:**

Since 2009, direct state aid per student has decreased \$1,212 or 16% after adjusting for inflation. RPS has been forced to reduce staffing across nearly all departments including teachers and support staff, counselors, operations and maintenance. This adds additional stress to the districts already severe facilities maintenance needs, classroom resources, and staffing challenges. Further, it impedes the district's ability to meet the challenges of educating students living in poverty much less be responsive to changing demographics such as the growth of EL (English learners) students in Southside which has nearly tripled since 2009.

**Contributing Factor:** Lack of sustainable affordability in coordinated investment strategies.

**Prioritization:** Moderate

**Justification:**

The City's Neighborhoods in Bloom program, a comprehensive strategy that invested federal grant funding into the city's most disinvested neighborhoods, was created in 1999 to stabilize these neighborhoods and ultimately stimulate sustainable private investment; many of these neighborhoods are barely recognizable from 20 years ago. However, this coordinated investment can have unintended consequences including increasing property values and constraining affordable housing development. This process can be seen in several neighborhoods, most notably Battery Park and Church Hill, that are experiencing rapidly changing demographics, increased values, and displacement of minority residents.

**Contributing Factor:** Lack of regional public transportation

**Prioritization:** High

**Justification:**

GRTC's limited routes into the counties, where many employment opportunities exist, continues to impede the employment options for city (and county) residents. Though GRTC's Bus Rapid Transit (BRT) system represents the single largest public transportation investment in the city in decades and may very well become the foundation of a true regional public transit network, in and of itself, it does not resolve regionally limited job and housing opportunities.

**Contributing Factor:** Current federal administrative climate has instilled a level of concern in many minority communities.

**Prioritization:** High

**Justification:**

Several people interviewed for this report stated that foreign-born, minority communities have been "laying low" in response to federal immigration policy. This has potentially far reaching implications. Foreign-born residents, most commonly from central America and concentrated in the city's Southside, may be more hesitant to engage with city resources and departments. As such, residents may be unwilling to do such things as call the police to report crimes, or contact code enforcement to report unsafe living conditions as well as partake in other city services. Further, they will be more unwilling to report landlord/tenant issues or Fair Housing violations.

**Contributing Factor:** Public Opposition

**Prioritization:** Moderate

**Justification:**

A multifamily residential development project known as the Westwood Tract, faced intense community opposition, complete with lawsuits, even though it is unsubsidized, market rate housing. Ultimately, the project was approved by the City. Community opposition can add considerably to development costs, ultimately making some projects financially impracticable. A recent report from VCU's Center for Urban and Regional Analysis examined the impact that 6 different low-income housing developments had on their surrounding neighborhoods and found no apparent negative impact on property values, property sales, or crime.

#### **iv. Disproportionate Housing Needs**

##### **1. Analysis**

- a. *Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*
- b. *Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*
- c. *Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.*
- d. *Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and region.*

Disproportionate housing needs are defined as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need.<sup>1</sup> HUD defines the categories of housing needs as:

1. Cost burdened and severe cost burden: “Cost burden” counts the households for which housing cost burden is greater than 30 percent of their income; “Severe cost burden” counts the number of households paying 50 percent or more of their income for housing.<sup>2</sup>
2. Overcrowding: Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 person persons per room are considered severely overcrowded.<sup>3</sup>
3. Substandard Housing: There are two types of substandard housing:
  - a. Households without hot and cold piped water, a flush toilet and a bathtub or shower; and
  - b. Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

HUD provides data on the demographics of households experiencing both “housing problems” and “severe housing problems.” Housing problems are defined as cost burden (30 percent and greater housing cost burden) and any of the other three issues. Severe housing problems are defined as severe cost burden (50 percent and greater cost burden) and any of the other three issues.

It is estimated that 2.4% of housing units lack complete kitchen facilities, 0.61% of housing units lack complete plumbing facilities and 2.04% have more than 1.01 person per room and thus considered

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<sup>1</sup> 24 C.F.R. § 5.152

<sup>2</sup> For renters housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

<sup>3</sup> This ratio does not include bathrooms, porches, foyers, halls, or half-rooms.

overcrowded.<sup>4</sup> Thus, when examining housing needs, it is primarily the issue of cost burden as it is the predominant housing need.

Table 1 shows the demographics of households with disproportionate housing needs. 45.93% of households in the city have at least one of the four housing problems. However, this rate varies greatly depending upon race/ethnicity. Non-Hispanic Native American households have the lowest incidence of housing problems at 36.75%. 38.44% of Non-Hispanic White household's experience at least one of the four housing problems. All other racial/ethnic groups experience housing problems at considerably higher rates. Fifty percent of Non-Hispanic Asian or Pacific Islanders and 51.95% of Black household's experience at least one housing problem; at 60.33%, Hispanic households have the highest rate of housing problems. Thirty-seven percent of family households with less than five people have housing problems compared to 61.85% of family households with more than five people. Fifty-one percent of Non-family households experience a housing problem.

*Table 1: Demographics of Households with Disproportionate Housing Needs; 2009-2013*

Disproportionate Housing Needs		(Richmond, VA CDBG, HOME, ESG) Jurisdiction				
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with severe problems	# households	% with severe problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	14,820	38,555	38.44%	7,445	38,555	19.31%
Black, Non-Hispanic	20,280	39,040	51.95%	10,950	39,040	28.05%
Hispanic	2,105	3,489	60.33%	1,410	3,489	40.41%
Asian or Pacific Islander, Non-Hispanic	750	1,488	50.40%	534	1,488	35.89%
Native American, Non-Hispanic	43	117	36.75%	14	117	11.97%
Other, Non-Hispanic	980	2,149	45.60%	553	2,149	25.73%
<i>Total</i>	<i>38,960</i>	<i>84,830</i>	<i>45.93%</i>	<i>20,890</i>	<i>84,830</i>	<i>24.63%</i>

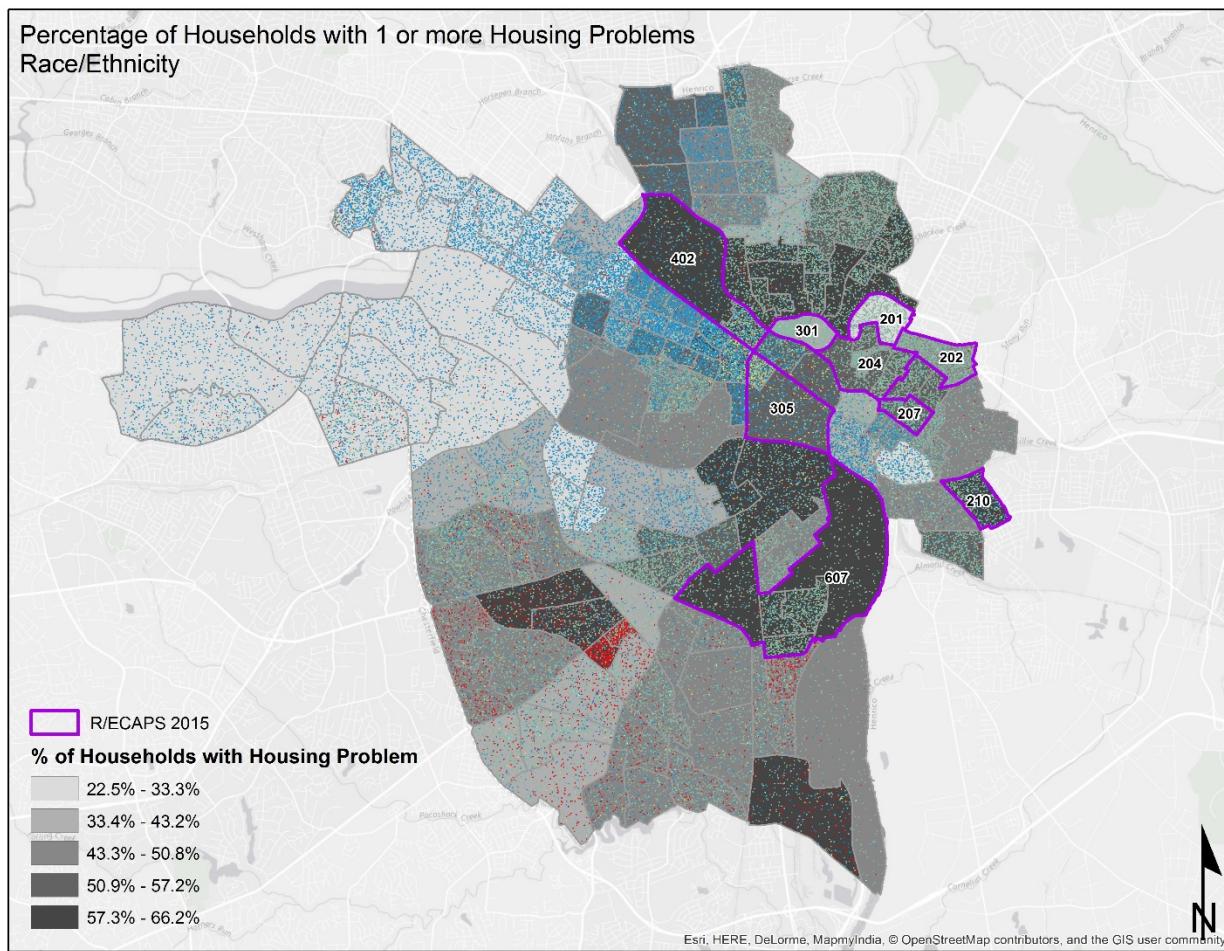
Overall, 24.63% of households experience severe housing problems in the city. Non-Hispanic Native American households, at 11.97% have the lowest incidence of severe housing issues. Nineteen percent of Non-Hispanic white households experience severe housing problems. Twenty-eight percent of non-Hispanic black households and 35.89% of non-Hispanic Asian or Pacific Islander households experience severe housing problems. Again, Hispanic households, at 40.41%, have the highest rate of severe housing problems.

Map 1 shows the percentage of households in the city experiencing one or more housing problems and the race/ethnicity of residents. Three areas that have among the highest incidence of housing problems – Census Tracts 402, 210, and 607 – are also designated racial/ethnic areas of concentrated poverty. Those areas predominated by white residents have among the lowest rates of housing problems except for the two block groups encompassing the majority of the VCU campus. Households experiencing housing problems are greatest in predominantly black and Hispanic neighborhoods.

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<sup>4</sup> U.S. Census Bureau; American Community Survey, 2015 American Community Survey 5-Year Estimates, Table B25049; B25051; B25014; generated by Brian Koziol; using American FactFinder; <http://factfinder2.census.gov>

Map 1: Percentage of Households with One or More Housing Problems; 2009-2013



Several of the neighborhoods which are home to the city's largest public housing developments exhibit relatively low levels of housing problems. This is likely due to public housing residents not being cost burdened due to the nature of their housing tenancy.

Family households account for 48.7% of the households in the city. Of those, 42.3% are families with children. In total, families with children account for 20.6% of households in the city. In those neighborhoods with the highest rates of housing problems, they account for 24.7 % (3,567 of 14,403) of households. Families with children account for 25.2% (3,183 of 12,622) of households in neighborhoods with the lowest rates of housing problems. Though this rate is comparable across the city, there exists a correlation between family size and housing problems.

As per Table 2, 37.5 % of families with less than five members experience a housing problem compared to 61.85% of families with more than five members; 51.28% of non-family households experience a housing problem. Family households are less likely to experience severe housing cost burden compared to non-family households, and smaller families are less likely to be cost burdened than larger families.

Table 2: Demographics of Family Households with Housing Problems and Severe Cost Burden; 2009-2013

Household Type and Size	# with problems	# households	% with problems	# with severe cost burden	# households	% with severe cost burden
Family households, <5 people	13,565	36,175	37.50%	5,775	36,175	15.96%
Family households, 5+ people	2,570	4,155	61.85%	710	4,155	17.09%
Non-family households	22,820	44,505	51.28%	11,999	44,505	26.96%

This difference contracts significantly between families of more than, and less than five members. Sixteen percent of family households with less than 5 members experience severe cost burden compared to 17.09% of family households with more than 5 members and 26.96% of non-family households.

Map 2 shows the residential location of foreign-born residents and households experiencing one or more housing problems. As discussed previously, few foreign-born residents reside in R/ECAPs. However, most of the foreign-born population from Central American countries live in areas with 43.3% of households experiencing a housing problem. Two Census Tracts, 706.01 and 609 have among the highest rates of housing problems in the city. Foreign-born residents from Korea overwhelmingly reside in neighborhoods with high rates of households with housing problems.

*Map 2: Percentage of Households with One or More Housing Problems: National Origin; 2009-2013*

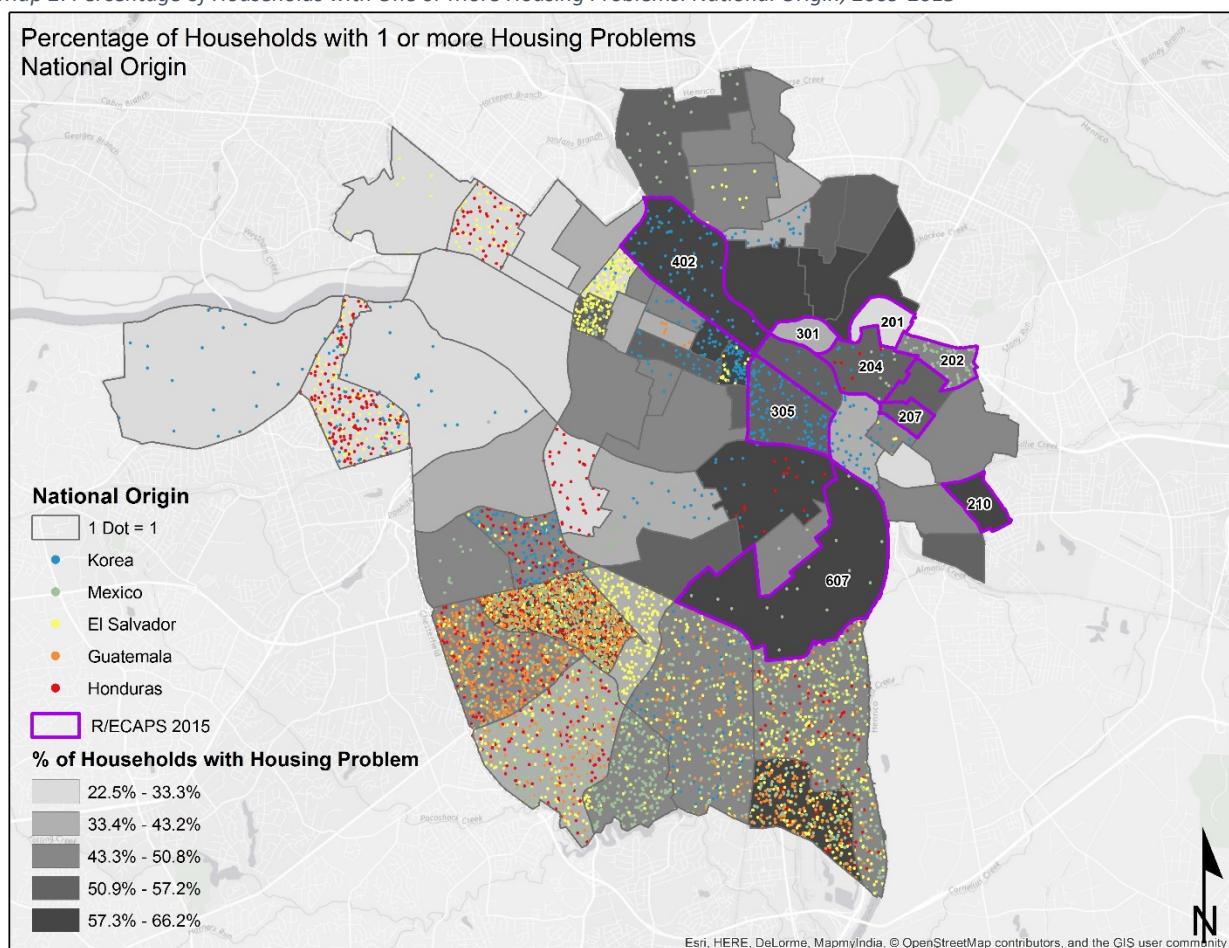
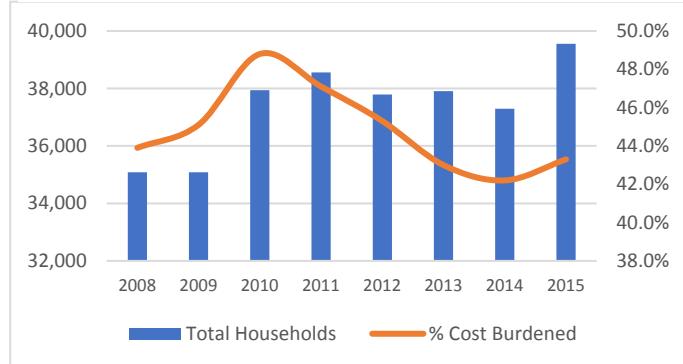


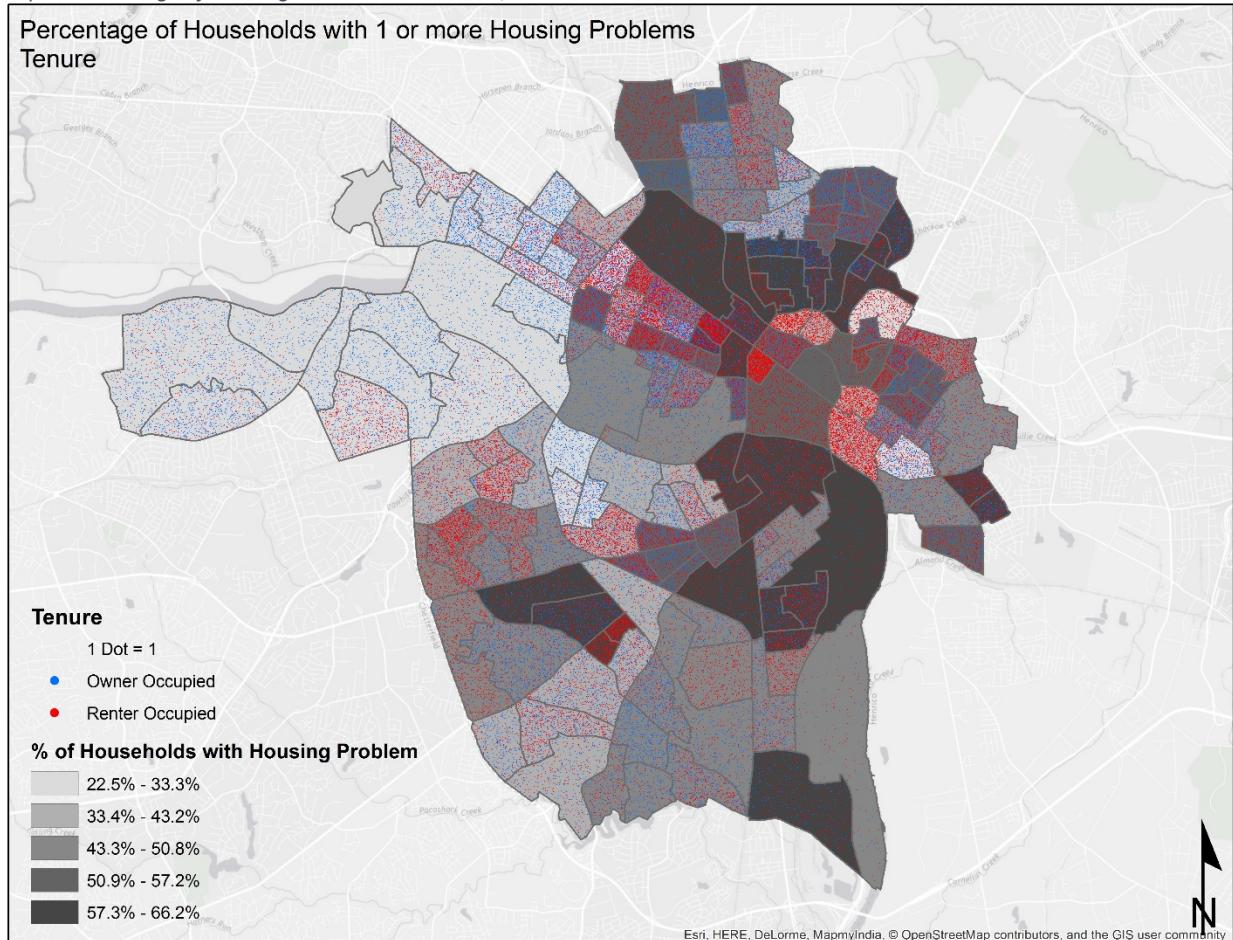
Figure 1 shows the total number of cost-burdened households in the city from 2008 to 2015. The total number of cost-burdened households has increased by over 4,000 while the percentage of cost-burdened households has fluctuated but is nearly the same, 43.3%, as it was in 2008. This indicates an overall increase in the number of housing units in the city but a persistent affordability problem.

*Figure 1: Cost Burdened Households; 2009-2013*



Source: Housing Virginia Sourcebook; Cost Burdened Households

*Map 3: Percentage of Housing Problems and Tenure; 2009-2013*



Map 3 shows the spatial relationship between the percentage of households with one or more housing problems and tenure. Though not entirely an issue dependent tenure type, renter households are more likely to reside in neighborhoods with higher rates of households with housing problems than owners. In neighborhoods with 57.3% or more of households experiencing a housing problem, 70.6% of households are renters compared to 29.4% of owners. Within those neighborhoods experiencing the lowest rates of housing problems, 32.7% are renters and 67.3% own their homes. The overarching relationship is that of

the racial/ethnic tenure disparity and the racial/ethnic housing needs disparity exhibited in Table 3. 53.9% of Non-Hispanic White households own their own home and 38.44% of Non-Hispanic White households experience one or more housing problem. Conversely, 35.9% of Non-Hispanic Black households own their own home and 51.95% experience a housing problem. This situation is most pronounced among Hispanic households, 19.7% of whom own their home and 60.33% of whom experience one or more housing issues. Clearly, housing issues effect protected classes differently dependent upon tenure. All this to say that minority renters are more likely to be cost-burdened than non-minority renters.

*Table 3: Housing Needs and Tenure by Race/Ethnicity; 2009-2013*

	% with problems	% Homeowner	% Renter
White, Non-Hispanic	38.44%	53.9%	46.1%
Black, Non-Hispanic	51.95%	35.9%	64.1%
Hispanic	60.33%	19.7%	80.3%
Asian or Pacific Islander, Non-Hispanic	50.40%	23.3%	76.7%
Native American, Non-Hispanic	36.75%	62.5%	37.5%
Other, Non-Hispanic	45.60%	29.2%	70.8%
<i>Total</i>	45.93%	43.1%	56.9%

Table 4 shows the units by bedrooms available within each type of publicly supported housing type as well as the number of children. Assuming that households with children occupy all the units with 2 or more bedrooms, there doesn't appear to be a shortage of

*Table 4: Publicly Supported Housing: Units by Number of Bedrooms and Children; 2016*

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	1,021	26.54%	1,462	38.00%	1,280	33.27%	2,221	57.73%
Project-Based Section 8	1,553	58.19%	694	26.00%	407	15.25%	915	34.28%
Other Multifamily	86	76.11%	0	0.00%	0	0.00%	0	0.00%
HCV Program	569	26.26%	778	35.90%	764	35.26%	872	40.24%

larger units of publicly supported housing available for families with children. In public housing: 57.73% of households have children and units with two or more bedrooms account for 71.27% of the total units. It should be noted that this analysis does not consider the number of children per household and so it should be used with caution. Though according to HUDs Picture of Subsidized Housing, 22% of publicly supported households are overhoused meaning they occupy units that have more bedrooms than people.<sup>5</sup> 12% and 35% of households in Public Housing and the Housing Choice Voucher Program are overhoused respectively.<sup>6</sup>

## 2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Housing discrimination in the rental market can serve to drive up costs for households. If a protected class is being discriminated in the provision of housing, members of that protected class may be forced

<sup>5</sup> HUD. Office of Policy Development and Research. Picture of Subsidized Households. 2016 based on 2010 Census.

<sup>6</sup> Ibid.

into more expensive and/or ill-suited housing than otherwise in a market free from discrimination. As part of the previous Analysis of Impediments to Fair House prepared for the City, HOME conducted matched pair tests of rental properties in the city that revealed differential treatment of black and white testers. 35% revealed differences in treatment that favored the white tester. Testing provides a window into the experiences of different groups of people in their search for housing. The results of tests conducted in Richmond indicate discrimination based upon familial status, disability status, and racial status remains a concern. Though the tests conducted in preparation for that report should be interpreted as a statistical measurement of prevalence, it is safe to conclude that discrimination in the leasing and provision of housing continues to distort the private housing market and restrict housing choice for protected classes.

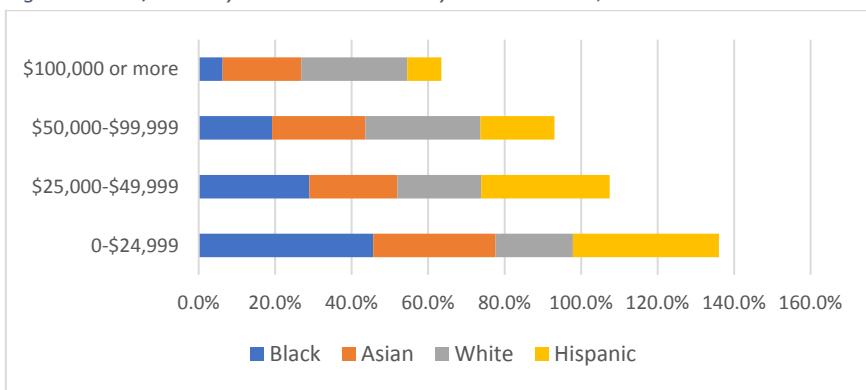
Too commonly, issues of housing cost burden are focused solely on the issue of housing affordability, thus the focus on various housing incentives such as the Low-Income Housing Tax Credit and other HUD and private market financing options. However, little attention is paid to wage disparities

among protected classes. As previously discussed and exhibited in Figure 2, there exist vast differences between the incomes of various racial/ethnic groups. Part of the solution to solving the affordability issue resides in working to close this income gap.

A report by the Partnership for Affordable Housing released in 2015 had several key findings relevant to the discussion of cost-burden and affordability that should be noted. The report found that within the Richmond region:

- There is shortage of 15,000 units affordable to households with incomes less than 50% of AMI.
- 37% of the rental inventory affordable to households with incomes less than 30% of AMI is occupied by households with incomes greater than 30% AMI.
- 52% of housing affordable to households earning between 50% and 80% of the AMI is occupied by households earning more than 80% AMI. These households serve to crowd out lower income households.
- There are approximately 27,500 households renting in the 80-120% AMI category than units affordable to this income group. This exacerbates the crowding out of lower income households.
- There are 53,421 fewer housing units affordable to households that earn over 80% AMI than households in this income group. However, construction of housing in this price range requires access to ever-limited subsidies. Thus, building housing targeted to households earning between 80% and 120% of AMI may help alleviate the pressure felt in this market segment.

*Figure 2: Race/Ethnicity Household Income by Income Cohort; 2011-2015*



- Suburban jurisdictions do not have sufficient undeveloped land designated for multifamily development. Rental demand will then fall disproportionately, as it currently does, on the City.<sup>7</sup>

Furthermore, the City of Richmond Affordable Housing Strategy Report from 2014 found:

- 35% of the city's households earn less than \$24,999 per year which supports an affordable rent of only \$500 per month for a two-bedroom unit. Roughly 19% of Richmond's rental units rent for this amount or less.
- Approximately 20% of renter households that earn less than 30% of AMI pay more than 50% of their gross income on housing.
- There is a large stock of vacant lots as well as vacant and blighting housing units throughout the city, but the cost to build or acquire and rehabilitate housing in certain neighborhoods often exceeds their market value.<sup>8</sup>

A report commissioned by City of Richmond Councilwoman Ellen Robertson in 2015 to examine the mortgage lending behavior of the city's lending institutions found:

- Between 2010 and 2013 white borrowers accounted for 1,243 home purchase mortgages compared to 112 mortgages to black borrowers and just 24 to Hispanic borrowers.
- Origination and denial rates were grossly disparate: white borrowers experienced a 48.2% origination and 13.7% denial rate compared to black borrowers who experienced a 25.8% origination rate and 34.6% denial rate.
- Borrower income did not account for the disparities in loan outcomes exhibited by borrower race/ethnicity. Black applicants, regardless of income, were less likely to receive a home purchase loan.<sup>9</sup>

The City's 2016-2020 Consolidated Plan states: "Richmond is in the initial stages of shifting its approach to affordable housing from simply improving the housing of the City's extremely low-, very low-, and low-income residents to a more holistic anti-poverty strategy as recommended in the Mayor's Anti-Poverty Commission Report released in January 2013. That report focused on education and workforce development; job creation; regional transportation; policy and legislative initiatives that broaden access to a living wage and financial assistance programs; and the development of unique, healthy, and inclusive communities. Over the five years included in this Consolidated Plan, the recommendations and strategies of the Anti-Poverty Commission Report will be further developed by the City's elected leaders and staff, particularly the Department of Economic and Community Development, Richmond Public Schools' elected leaders and staff, regional economic development leadership including the Greater Richmond Partnership, and other regional partners."<sup>10</sup>

The Office of Community Wealth Building, launched in 2015, is tasked with reducing poverty by 40% and childhood poverty by 50% by 2030. The Office is charged with working across multiple City agencies and

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<sup>7</sup> The Partnership for Housing Affordability. Prepared by the Virginia Center of Housing Research at Virginia Tech and the Center for Urban and Regional Analysis at VCU. Housing the Richmond Region: Needs, Impediments and Strategies.

<https://partnershipaffordablehousing.com/wp-content/uploads/2015/04/Full-Report.pdf>

<sup>8</sup> David Paul Rosen and Associates. City of Richmond Affordable Housing Strategy. Richmond, Virginia. November 6, 2014.

<sup>9</sup> Housing Opportunities Made Equal of Virginia, Inc. Mortgage Lending in the City of Richmond: An Analysis of the City's Lending Patterns. 2015.

<sup>10</sup> City of Richmond. Consolidated Plan 2016-2020, Strategic Plan. Page 98.

portfolios as well as crucial external agencies such as Richmond Public Schools and RRHA. For all intents and purposes, all the work that the OCWB undertakes is within the broad definition of Affirmatively Furthering Fair Housing. It's 5 key priorities being:

1. Expanded workforce development
2. Targeted job creation
3. Improved educational outcomes
4. Development of a regional transportation system
5. Pursuing the redevelopment of one or more public housing communities with a commitment to no involuntary displacement of residents.<sup>11</sup>

### **3. Contributing Factors of Disproportionate Housing Needs**

**Contributing Factor:** Lack of regional public transportation

**Prioritization:** Moderate

**Justification:**

GRTC's limited routes into the counties, where many employment opportunities exist, continues to impede the employment options for city (and county) residents. Though GRTC's Bus Rapid Transit (BRT) system represents the single largest public transportation investment in the city in decades and may very well become the foundation of a true regional public transit network, in and of itself, it does not resolve regionally limited job and housing opportunities.

**Contributing Factor:** Lack of regional cooperation

**Prioritization:** High

**Justification:**

Housing Richmond's Workforce, a report conducted by the George Mason University Center for Regional Analysis found that all the suburban jurisdictions surrounding, but not including the City, do not have sufficient undeveloped land zoned for townhouse and multifamily development in their landuse plans. Several of these jurisdictions are entitlement jurisdictions and are thus obligated to Affirmatively Further Fair Housing. Suburban zoning and land use has had the effect of restricting minority and lower-income household access by placing onerous and costly requirements on single-family development such as large lot sizes and setbacks, and/or as in this case, limiting the availability of properly zoned land to meet the needs of its community. Moreover, the City has the largest share of publicly subsidized housing due to numerous factors including opposition to affordable housing in the surrounding counties at both the citizen and elected official level.

**Contributing Factor:** Discrimination in the rental market

**Prioritization:** High

**Justification:**

Rental market testing conducting by HOME revealed disparate treatment favoring white home seekers. Discrimination serves to distort the housing market by limiting the options of protected class home seekers, resulting in them having to either pay for housing that may cause them to become housing cost burdened, or seek low-quality housing that may be less safe and have detrimental health implications. Additional research shows that discrimination based on source of legal income severely limits housing

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<sup>11</sup> Office of Community Wealth Building. Year One Annual Report. City of Richmond, Virginia. April 2016.

[http://www.richmondgov.com/CommunityWealthBuilding/documents/OCWB\\_Annual\\_Report\\_April\\_2016.pdf](http://www.richmondgov.com/CommunityWealthBuilding/documents/OCWB_Annual_Report_April_2016.pdf)

options available to households that derive their income from some other form than wages, namely Housing Choice Vouchers and Social Security payments.

**Contributing Factor:** Disparate effect of City policy and programs

**Prioritization:** Moderate

**Justification:**

Code enforcement serves to address legitimate public health and safety concerns but may often have unintended consequences, especially for protected classes and low-income households. These consequences may include loss of housing and/or displacement. Fiscal constraints along with cultural awareness and language barriers may contribute to this problem.

**Contributing Factor:** Fiscal constraints

**Prioritization:** Moderate

**Justification:**

As discussed in the City's most recent Consolidated Plan, budgetary constraints limit the number of Housing Choice Vouchers available to city residents. Fiscal constraints also impede the redevelopment of public housing and affordable housing.

**Contributing Factor:** Current federal administrative climate has instilled a level of concern in many minority communities.

**Prioritization:** High

**Justification:**

Several people interviewed for this report stated that foreign-born, minority communities have been "laying low" in response to federal immigration policy. This has potentially far reaching implications. Foreign-born residents, most commonly from central America and concentrated in the city's Southside, may be more hesitant to engage with city resources and departments. As such, residents may be unwilling to do such things as call the police to report crimes, or contact code enforcement to report unsafe living conditions. Further, they will be more unwilling to report landlord/tenant issues or Fair Housing violations.

## C. Publicly Supported Housing Analysis

Within the City there are 98,349 housing units. Of this total, public housing accounts for 4,030 units (4.1%), project-based Section 8 accounts for 2,747 units (2.79%), other HUD assisted Multifamily units account for 112 units (0.11%), and housing choice voucher units account for 2,392 or (2.43%).<sup>1</sup>

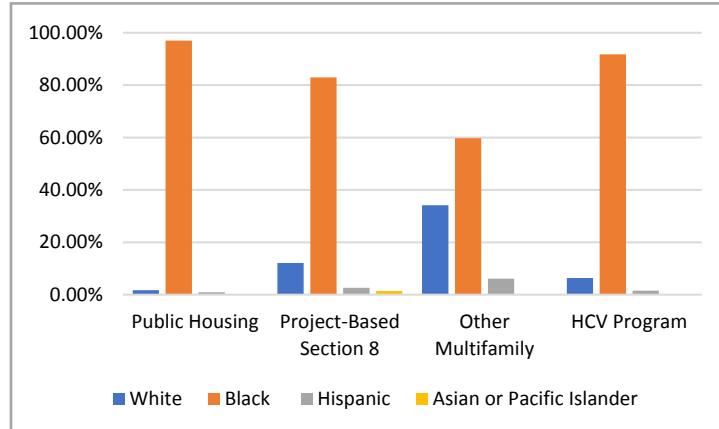
Public Housing units within the city are overwhelmingly occupied by black tenants as shown in Figure 1. According to data provided by HUD, black tenants account for 96.99% of the total population in public housing; white tenants account for 1.68%; and Hispanic tenants for 0.93%.

This racial occupancy disparity is slightly less pronounced in the project based section 8 program: 12.12% of tenants are white, 82.95% are black, 2.62% are Hispanic, and 1.41% are Asian or Pacific Islander.

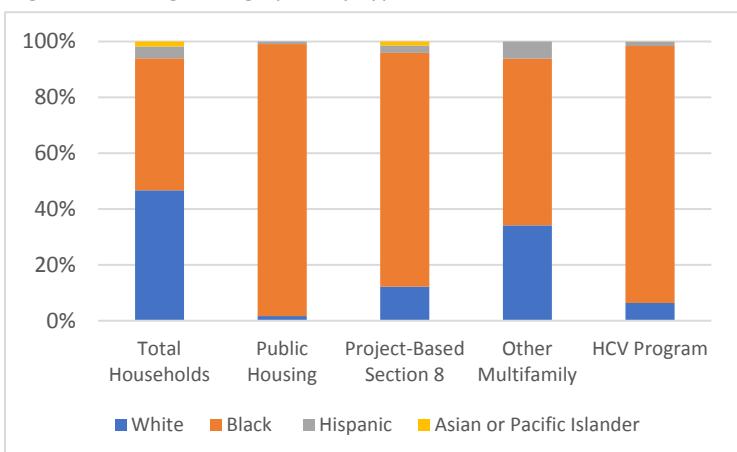
There are 112 HUD supported multifamily units within the city: 34.15% are white, 59.76% are black, and 6.1% are Hispanic. The share of white tenants is other HUD supported multifamily units is much greater than in other publicly assisted housing types. However, the low number of overall tenants within this type of housing may be an influencing factor. Of the 2,392 housing choice voucher units within the city, 6.36% are leased by white tenants, 91.74% by black tenants, 1.52% by Hispanic tenants and just .05% by an Asian or Pacific Islander tenant.<sup>2</sup>

Comparing the racial/ethnic composition of households in publicly supported housing to all households within the city reveals stark disparities. As evidenced by Figure 2, black households account for a disproportionate share of households in publicly supported housing. White households are disproportionately under-represented in publicly supported housing accounting for 45.45% of the city's total number of households yet only 1.68% of the households in public housing,

*Figure 1: Publicly Supported Housing Occupancy Demographics; 2016*



*Figure 2: Housing Demographics by Type; 2016*



<sup>1</sup> Table 5 – Publicly Supported Housing Units by Program Category

<sup>2</sup> Table 6 – Publicly Supported Households by Race/Ethnicity

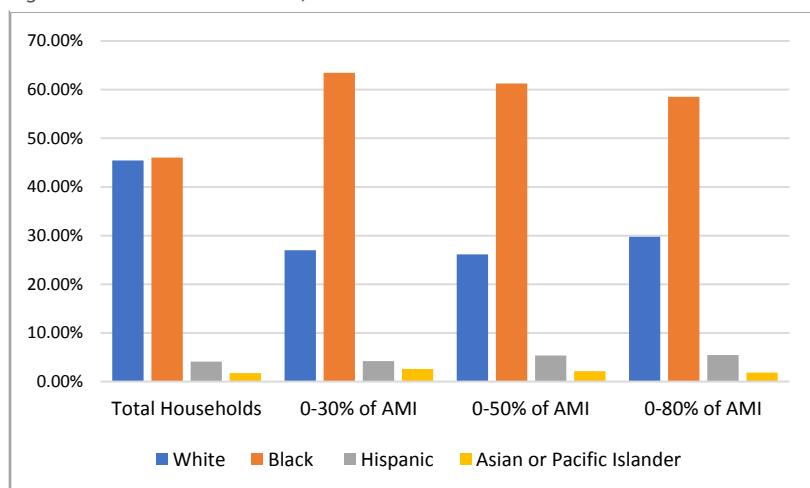
12.1% of households in project-based section 8 housing, 34.2% in other multifamily, and 6.4% in the Housing Choice Voucher program.

Black households are likewise disproportionately over-represented in publicly supported housing accounting for 46.02% of the total number of households in the city, yet account for 96.99% of households in public housing, 82.9% of households in project based section 8 housing, 59.8% of households in other multifamily, and 91.7% of households in the housing choice voucher program.

Hispanics are generally under-represented in publicly assisted housing in the city. They account for 4.11% of households within the city yet just 0.93% of households in public housing, 2.6% in project based section 8, 6.1% in other multifamily, and 1.5% of housing choice voucher holders. Asian or Pacific Islander households are likewise under-represented within publicly assisted housing. They account for 1.75% of the total number of households within the city yet do not reside at all in public housing, account for just 1.4% of the households in project based section 8 housing, and .01% of voucher holders.

Figure 3 shows the percentage of households by race/ethnicity within various area median income (AMI) cohorts. The grouping on the left represents the percentage of all households occupied by the four-predominant racial/ethnic groups within the city. The subsequent groupings represent the percentage of households by race/ethnicity that have incomes falling within various area median income cohorts.

Figure 3: Area Median Income; 2011-2015



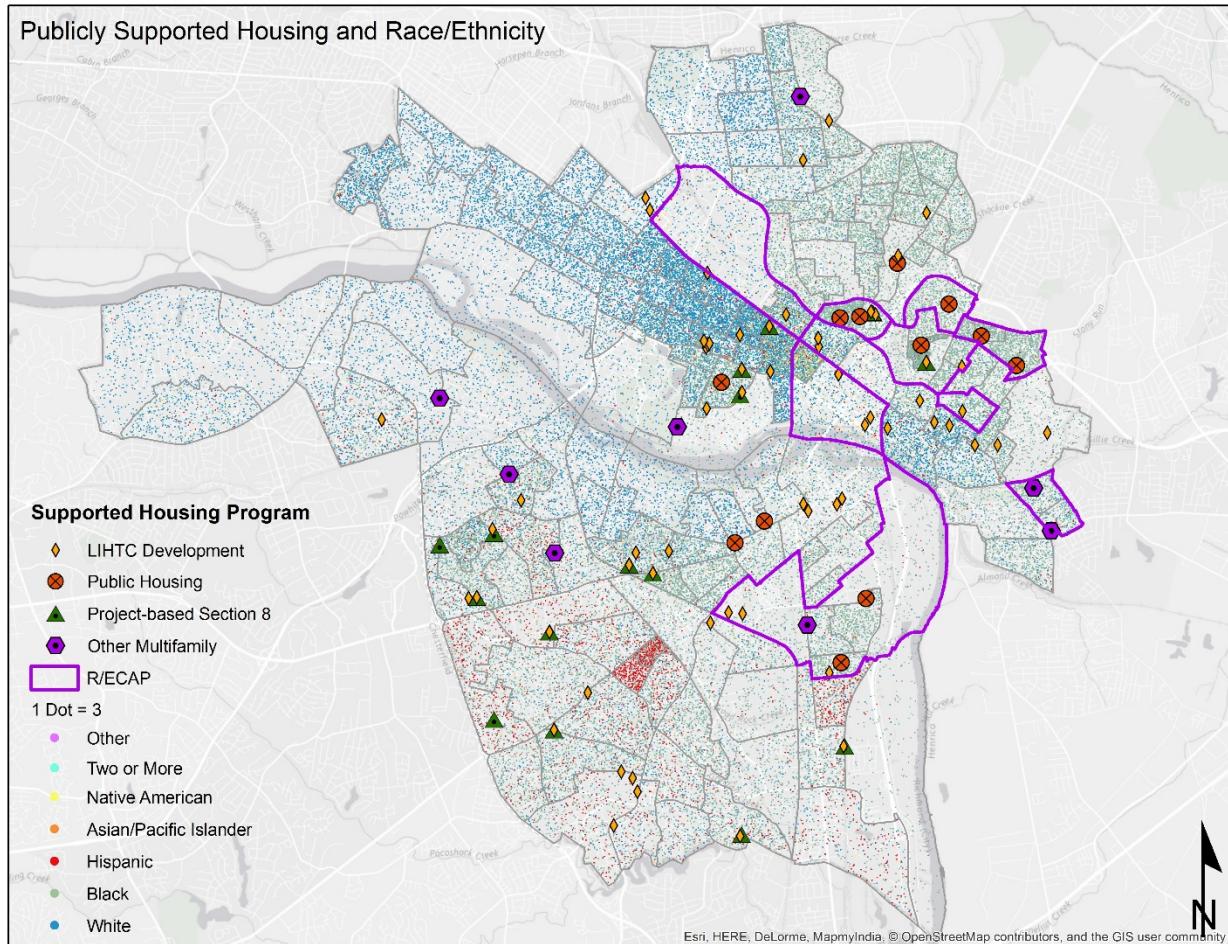
The 2017 area median income for the City of Richmond is \$78,700 and is scaled according to household size.<sup>3</sup> For example, a family of four earning in the 0-30% of AMI translates to \$24,600; 0-50% is \$38,700, and 0-80% is \$61,900. Black households represent a disproportionate share of households across all three income classifications, while white households are under-represented. Black households account for 46.02% of all households in the city yet account for 63.46% of households within the 0-30% range, 61.27% of the 0-50% range and 58.52% of households within the 0-80% range.

Hispanic households are relatively evenly represented across all three income cohorts. They make up 4.11% of all households within the city, 4.19% in the 0-30% range, 5.36% within the 0-50% range, and 5.47% within the 0-80% range. Likewise, Asian or Pacific Islander households are also relatively equally represented across income categories. Asian or Pacific Islander households account for 1.75% of all households within the city and 2.61% of the 0-30% income group, 2.12% of the 0-50% group, and 1.85% of the 0-80% cohort.

<sup>3</sup> HUD, FY 2017 Income Limits Documentation System. <https://www.huduser.gov/portal/datasets/il/il2017/2017summary.odn>

Map 1 shows the location of publicly supported housing by program type as well as race/ethnicity. Within the city, publicly supported housing is not located in the predominantly white portions of the city, namely the Fan and Westend, but also much of the Northside and the Bon Air area. Most publicly supported housing is found in predominantly black neighborhoods and to a lesser degree, Hispanic neighborhoods in the Southside. However, this phenomenon is most likely due to the demographic shift – from black to Hispanic – that has occurred in the Southside over the past several decades as opposed to targeted investment in Hispanic communities.

*Map 1: Publicly Supported Housing Location and Demographics; 2016*



There are 3,771 units of public housing within the city. The eight public housing developments are all located within R/ECAPs. Combined, these developments have 3,007 units; only 764 units of public housing are in non-R/ECAP neighborhoods.<sup>4</sup>

The public housing population within R/ECAP tracts is overwhelmingly disproportionately black; 97% of residents are black, 1.6% are white, and 1.03% are Hispanic. These rates vary only slightly in non-R/ECAP tracts; 1.98% of residents of public housing located in non-R/ECAP tracts are white, 96.97% are black, and 0.53% are Hispanic. The percentage of families with children residing in public housing located in R/ECAP tracts is 61.01% compared to 46.02% in non-R/CAP tracts. The percentage of

<sup>4</sup> Table 7 – R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

elderly residing in public housing located within R/ECAP tracts is 16.57% compared to 24.85% in non-R/ECAP tracts. 15.13% of public housing residents have a disability<sup>5</sup>; 13.41% of public housing residents in R/ECAP tracts have a disability compared to 21.28% of public housing residents in non-R/ECAP tracts.

672 units of project-based section 8 housing are located within R/ECAP tracts compared to 1,970 units in non-R/ECAP tracts. The demographic composition of project-based section 8 housing varies upon location. Within R/ECAP tracts project-based Section 8 housing is 4.29% white, 94.67% black, and 1.04% Hispanic; in non-R/ECAP tracts it is 14.82% white, 78.90% black, 3.17% Hispanic, and 1.89% Asian or Pacific Islander. The percentage of families with children also varies significantly; within R/ECAP tracts 22.06% of families have children compared to 38.46% in non-R/ECAP tracts. The elderly population in project-based section 8 housing also varies according to location; 31.47% of resident in R/ECAP tracts are elderly compared to 41.63% in non-R/ECAP tracts. 25.25% of project-based public housing section 8 housing have a disability. Within R/ECAP tracts this rate jumps to 55.59% compared to 14.88% in non-R/ECAP tracts.

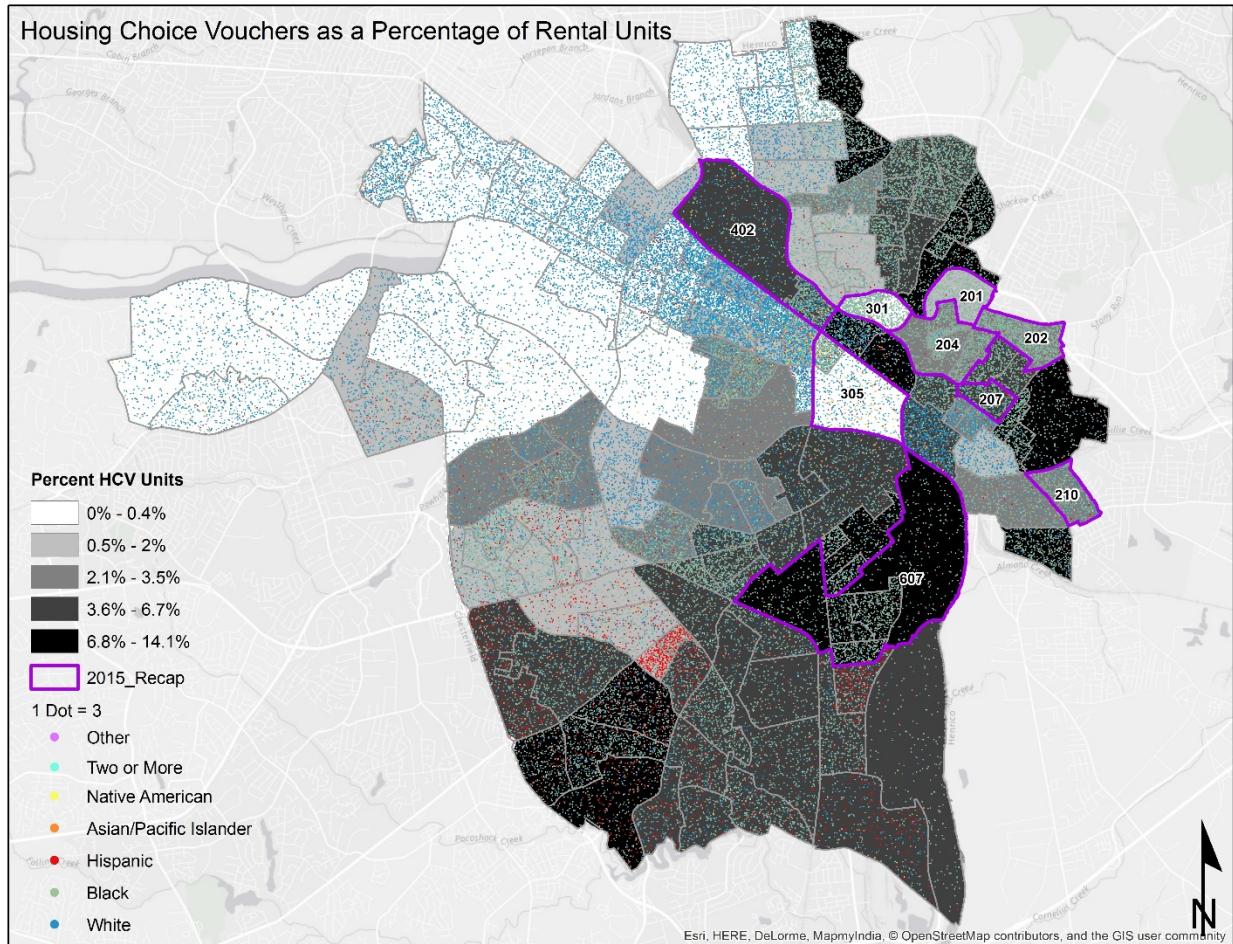
Other HUD Multifamily housing includes section 202 (housing for the Elderly) and section 811 (Housing for persons with disabilities). There are 112 units of such housing within the city. Within R/ECAP tracts 38.46% of residents are white and 61.54% are black. In non-R/ECAP tracts 33.33% of residents are white, 59.42% are black, and 7.25% are Hispanic. This racial/ethnic disparity is by far the lowest of the publicly supported housing types in the city. None of these units are occupied by families with children. The percentage of elderly residents in R/ECAP tracts is 5% compared to 77.42% in non-R/ECAP tracts. 13.27% of residents in other HUD multifamily housing have a disability; they are almost all exclusively located in R/ECAP tracts. Within R/ECAP tracts 65% of residents have a disability compared to just 2.15% of residents in non-R/ECAP tracts.

The housing choice voucher program is HUD's residential mobility program designed to increase residential choice for low-income households. Within the city there are 2,392 households utilizing the voucher program. Map 2 shows voucher utilization as a percentage of the total number of rental units per block group. 14.9% of voucher households are located within R/ECAP tracts compared to 85.01% found in non-R/CAP tracts. This disparity shows that, within the city at least, voucher holders can secure housing in neighborhoods that are not designated as racially/ethnically areas of concentrated poverty. However, the map below which shows housing choice voucher utilization as a percentage of rental units per census tract, suggests that true residential mobility remains hypothetical for most voucher holders. Of note, is the lack of households utilizing vouchers in predominantly white portions of the city, namely within the central business district, Northside, the Fan, Westend, and Bon Air.

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<sup>5</sup> Table 15 – Disability by Publicly Supported Housing Program Category

Map 2: Housing Choice Vouchers as a Percentage of Rental Units; 2016

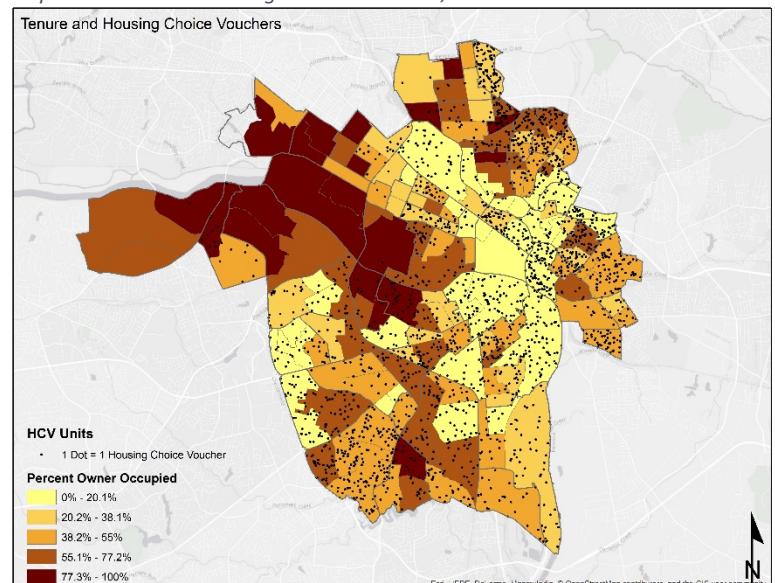


Examining this issue in greater depth reveals that those areas described above also have among the highest homeownership, and subsequently the lowest rental rates in the city (see Map 3). They are also the neighborhoods that have among

the highest access to various opportunity factors.

Within R/ECAP tracts, voucher holders are 5.36% white, 92.42% black, and 1.58% Hispanic. Non-R/ECAP tract voucher holders are 6.61% white, 91.58% black, 1.53% Hispanic, and .06% Asian or Pacific Islander. 32.30% of voucher households residing in R/ECAPs have children compared to 41.85% of households in non-R/ECAP tracts. Relatively few voucher holders are elderly: 18.01% of voucher households in R/CAP tracts are elderly compared to 16.95% in non-R/ECAP tracts. Overall, 29.4% of voucher residents have a

Map 3: Tenure and Housing Choice Vouchers; 2016



disability: within R/ECAP tracts, 32.30% of voucher residents have a disability compared to 29.02% in non-R/ECAP tracts.

- i. *(A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.*  
*(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.*

To date only one property has been converted under RAD. As part of the Fay Towers redevelopment effort, 77 units were converted under the RAD program. Residents were relocated to Highland Park Senior Apartments. Currently, the remaining 123 units are in the process of being converted under RAD and awaiting redevelopment. There has been no change in the demographics of residents.

- ii. *Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

Comparing each type of publicly supported housing type to its immediate neighborhood is more complicated than it would appear as the demographics of the units influence the demographics of the neighborhood. Public housing developments are all located in predominantly black neighborhoods except for Hillside Court which is in a block group that is 42% white, 54% black, 2% Hispanic, 1% Asian or Pacific Islander, and 1% of individuals who identify as two or more races/ethnicities.<sup>6</sup>

Section 8 project-based developments are in significantly more diverse neighborhoods than public housing developments. In aggregate, project based section 8 developments are in neighborhoods that are 23.9% White, 60.7% Black, 9% Hispanic, 3.7% Asian or Pacific Islander, 0.3% Native American, 0.2% Other, and 2.2% Two or more.<sup>7</sup>

HUD Multifamily developments are in slightly less diverse neighborhoods overall than Section 8 developments but greatly more diverse than public housing. HUD multifamily developments are in neighborhoods that, in aggregate are: 24.8% White, 64.7% Black, 6.8% Hispanic, 1.6% Asian or Pacific Islander, 0.3% Native American, 0.1% Other, and 1.7% Two or More.<sup>8</sup>

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<sup>6</sup> Based upon geostatistical analysis performed by HOME of VA.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

**a. Disparities in Access to Opportunity**

- i. *Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.*

Arguably, the most significant disparity in opportunity faced by residents of publicly supported housing is residing in high poverty neighborhoods. The second most significant issue, and one intertwined with poverty, is access to high performing schools. A significant body of research suggests that people who live in distressed neighborhoods have worse life outcomes than do people living in less disadvantaged areas. Not only do high poverty neighborhoods have issues with crime, health, and education opportunities, they serve to further restrict the opportunities of those growing up in them.<sup>9</sup>

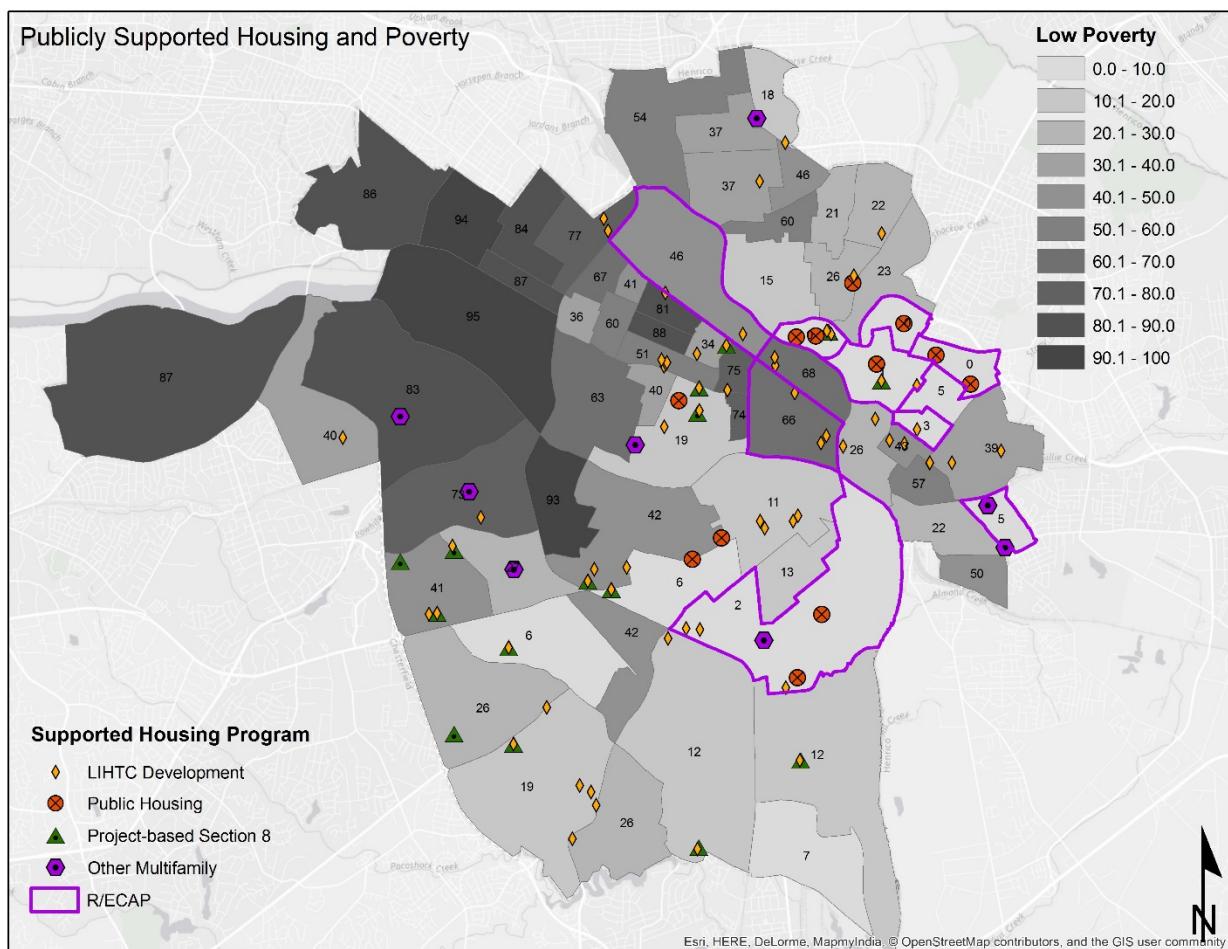
Map 4 shows the low poverty index and location of publicly supported housing by program type. Almost all publicly supported housing, regardless of program, is in areas with among the lowest low poverty index values. Thus, in high poverty neighborhoods. The majority of public housing is located in neighborhoods with low poverty index scores of one or less. Hillside Court is associated with the highest low poverty index score of all public housing – 42. Of note, this is by far the most racially integrated public housing development in the city. Project-based Section 8 developments are located in neighborhoods with marginally higher low poverty index values, ranging from a low value of zero to several in neighborhoods with a value of 41. Other HUD Multifamily fares marginally better, low poverty index values range from 2 to 83. However, the property located in the neighborhood with a low poverty index value of 83 is only 8 units.

Map 5 shows the school proficiency index and location of publicly supported housing by program type. Residents of publicly supported housing have extremely limited access to high performing schools. It is obvious based on the demographic composition of public housing residents and the fact that 61.01% of the 3,007 families in public housing that is in R/ECAPs have children, that the intention of Brown v Board has yet be realized in Richmond. No credible research exists that correlates educational performance to skin color, however, there exists a significant body of research that strongly correlates school performance to poverty. Combining the numerous adverse effects of residing in a high poverty neighborhood with severely constrained educational opportunities only serves to perpetuate inter-generational poverty.

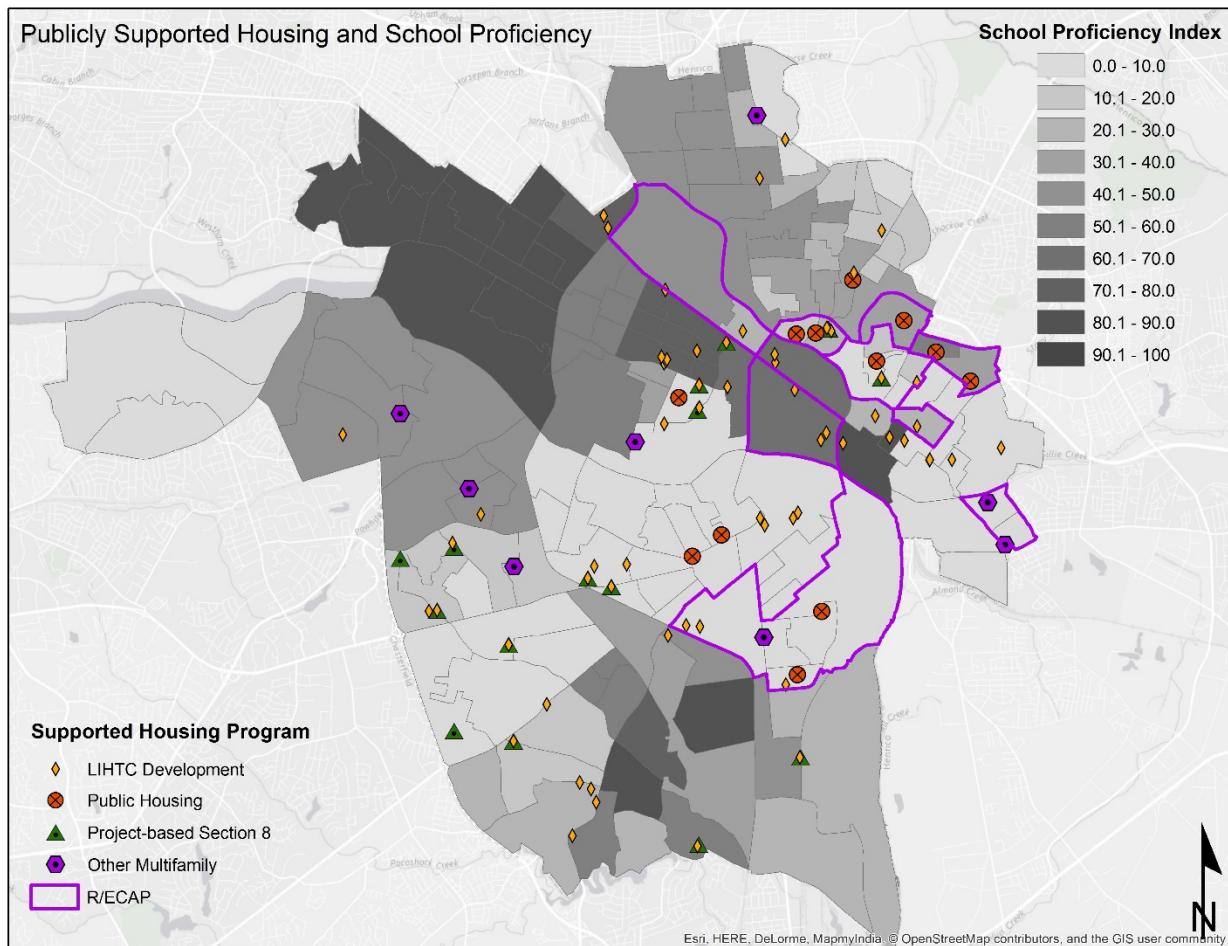
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<sup>9</sup> HUD. PD&R. Understanding Neighborhood Effects of Concentrated Poverty. Winter 2011.  
<https://www.huduser.gov/portal/periodicals/em/winter11/highlight2.html>

Map 4: Publicly Supported Housing and Poverty; 2009-2013



Map 5: School Proficiency and Publicly Supported Housing; 2009-2013



## **2. Additional Information**

Analysis of life expectancy data in Richmond has shown that residents of large public housing complexes have life expectancy of up to 20 years less than residents in more affluent neighborhoods. This disparity is reflective of differences in what are commonly referred to as “social determinants of health” – those social and economic conditions that both directly impact health and the likelihood of residents to engage in healthy behavior. In collaboration with the Richmond City Health District and RRHA each of the six large public housing communities now have a unit or community space which serves as a health resource center within each community. The health resource centers provide on-site preventative-based health screenings, treatment, and education through a nurse practitioner and nurse who staff each site. Additionally, each resource center hosts a community advocate, part-time employees who generally reside in the community who serve as community liaisons charged with the dissemination of information and resources on health-related issues into the community.<sup>10</sup>

Since 2014, the City has provided funding through its Affordable Housing Trust Fund for a mobility counseling program administered by Housing Opportunities Made Equal of VA, Inc. to help residents with housing choice vouchers move to neighborhoods of their choice. To date the program has helped to provide assistance to 100 residents utilizing Housing Choice Vouchers to identify and move to neighborhoods of their choice. Additionally, the program has increased the number of landlords in low-poverty neighborhoods willing to accept vouchers.

The City and RRHA have for several years been working on plans to transform public housing beginning with Creighton Court, a 504-unit public housing development, into a mixed income community. In total, 1,200 to 1,400 units would be developed with units both in the immediate neighborhood but also scattered throughout the city. Funding for the project is being sought through the federal Choice Neighborhood Initiative. Funding for the first phase, involving the construction of 105 new housing units has been secured.

## **3. Contributing Factors of Publicly Supported Housing Location and Occupancy**

**Contributing Factor:** Historical Site Selection

**Prioritization:** High

**Justification:**

By granting local governments the authority to establish public housing authorities, the federal government relinquished control as to where public housing would be built, or if it would be built at all. Jurisdictions that wished to address housing low-income residents were provided federal funding to do so; however, the decision as to whether to build it was left up to local governments. The result was that more affluent jurisdictions had no obligation to address the housing needs of their poorest residents.<sup>11</sup> Since the location of public housing was under the authority of local governments, public opposition was hugely influential in determining where public housing was constructed. White residents across the country vehemently objected to the construction of public housing.<sup>12</sup> Suburban localities account for

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<sup>10</sup> Office of Community Wealth Building. Year One Annual Report. City of Richmond, Virginia. April 2016.

<sup>11</sup> Schwartz, Alex. Housing Policy in the United States.

<sup>12</sup> Ibid

17.3% of the nation's public housing; 64.5% of all units are in central cities.<sup>13</sup> In the Richmond region, the surrounding counties – Henrico and Chesterfield – account for zero public housing units.

**Contributing Factor:** Source of income discrimination

**Prioritization:** Moderate

**Justification:**

Discrimination based on the source of legal income, most commonly Housing Choice Vouchers, serves to concentrate subsidized households in specific areas of the city and region. As part of a research project conducted near the end of 2012, HOME called 124 multi-family apartment complexes located in the Richmond region and asked if they accepted Housing Choice Vouchers. Only 33 of them (26.6%) stated that they did. 58 of these apartment complexes were located within the city. Of these, only 9 complexes (15%) said they accepted Housing Choice Vouchers. Given that 90% of the households in the HCV program are headed by a female, there is strong evidence to support this form of discrimination having a disparate impact on families with children.

**Contributing Factor:** Community Opposition

**Prioritization:** Low

**Justification:**

Community opposition continues to be a factor in the siting publicly supported housing. Virginia Supportive Housing (VSH), a local non-profit, faced intense community opposition to its plans to renovate and expand New Clay House, a 47-unit supportive housing facility in the Carver Neighborhood. VSH had applied for LIHTC to help finance the expansion. Ultimately, the project was approved, however community opposition can serve to add considerably to costs, ultimately making some projects financially impracticable. A recent report from VCU's Center for Urban and Regional Analysis examined the impact that 6 different low-income housing developments had on their surrounding neighborhoods and found no apparent negative impact on property values, property sales, or crime.

**Contributing Factor:** Lack of public investment in specific neighborhoods

**Prioritization:** High

**Justification:**

RRHA's goal is to transform its entire public housing portfolio into mixed-income communities over the next 30-40 years. RRHA has already converted one development under the RAD program and has plans to convert others. Competition for dwindling federal funding is competitive. RRHA has applied for Choice Neighborhood Grants in the past and plans to continue to do so in the future to bring much needed funding into disinvested communities.

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<sup>13</sup> Page. 132 Schwartz.

## **D. Disability and Access Analysis**

### **1. Population Profile**

*a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

*b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.*

The term “disability” covers a broad spectrum of conditions. State and federal fair housing laws define disability as a physical or mental impairment that substantially limits a major life function, a history of having had such a condition, or the perception that one has such a condition. Alcoholics, persons with AIDS, and recovering substance abusers are covered by the law, but it does not include current users of illegal drugs. Local, state, and federal fair housing laws protect persons with disabilities from discrimination in housing transactions.

According to data provided by HUD, 31,513 individuals have a disability.<sup>1</sup> Table 1 shows the number of individuals and corresponding percentage of the total population that they represent having a disability by the type of disability. It should be noted that an individual may have more than one type of disability, thus the total number of disability types does not represent the total number of individuals with a disability but rather the total number of types of disabilities that all individuals with a disability have. Individuals experiencing ambulatory difficulty account for 9.19% of the total population, individuals experiencing cognitive difficulty account for 7.20% of the total population, and individuals with independent living difficulty account for 5.84% of the total population.

Table 2 shows the number and corresponding percentage of persons with one of the six types of disabilities outlined above. Persons aged 18-64 represent the largest share of individuals with a disability as this age group also accounts for 70.31% of the total population.

Assessing the spatial distribution of persons with disabilities by disability type is complicated by the format of the data – namely that disabilities can be compounded within a geography distorting spatial relationships. Map 1 shows the spatial display of disability by disability type. There are some obvious concentrations which require additional examination. Map 2 shows the number of individuals with a disability by age group. This spatial representation more accurately represents where persons with disabilities reside and if there are any concentrations in specific areas of the city.

*Table 1: Disability by Type; 2009-2013*

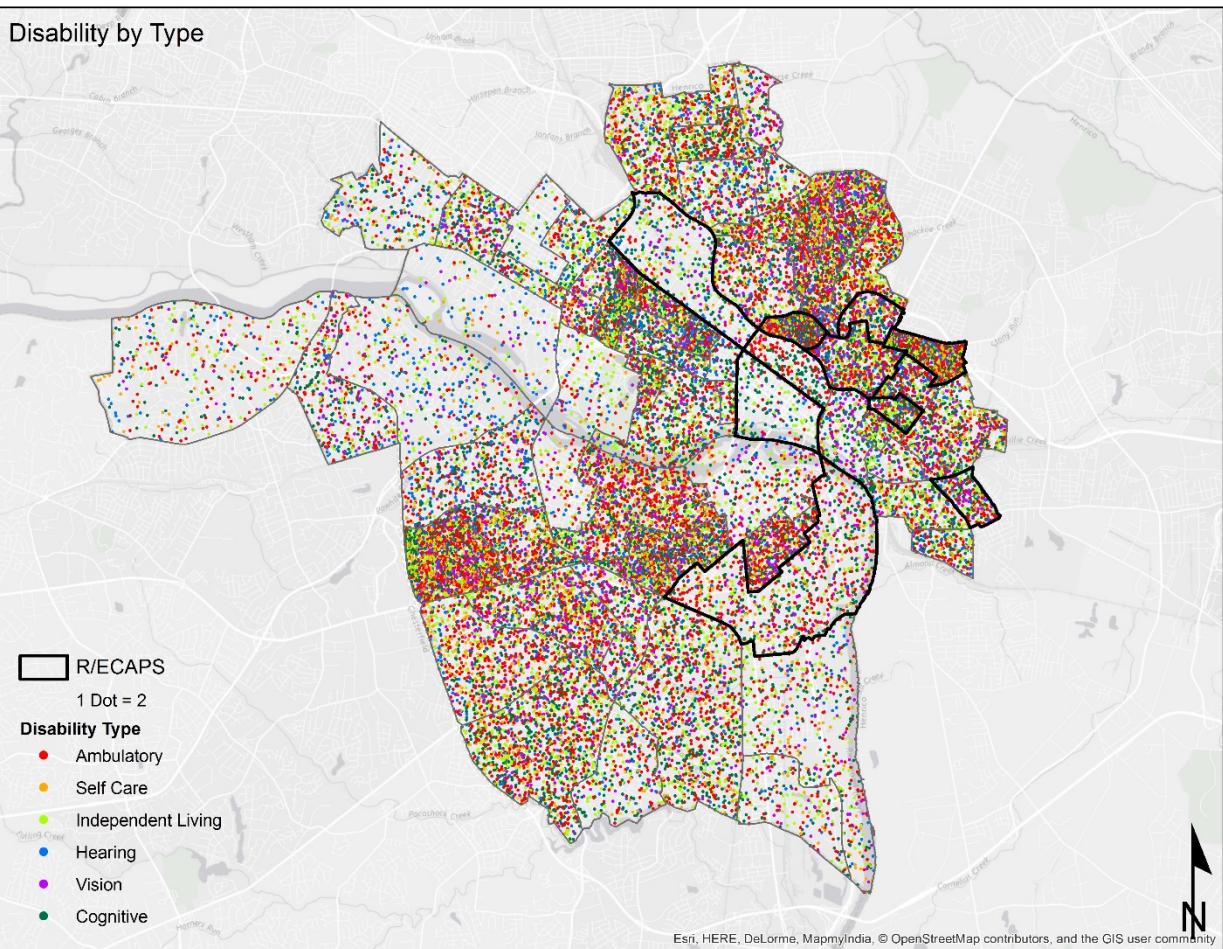
	<b>(Richmond, VA CDBG, HOME, ESG) Jurisdiction</b>	
<b>Disability Type</b>	<b>#</b>	<b>%</b>
Hearing difficulty	5,110	2.66%
Vision difficulty	6,224	3.24%
Cognitive difficulty	13,817	7.20%
Ambulatory difficulty	17,639	9.19%
Self-care difficulty	6,126	3.19%
Independent living difficulty	11,209	5.84%

*Table 2: Disability by Age Group; 2009-2013*

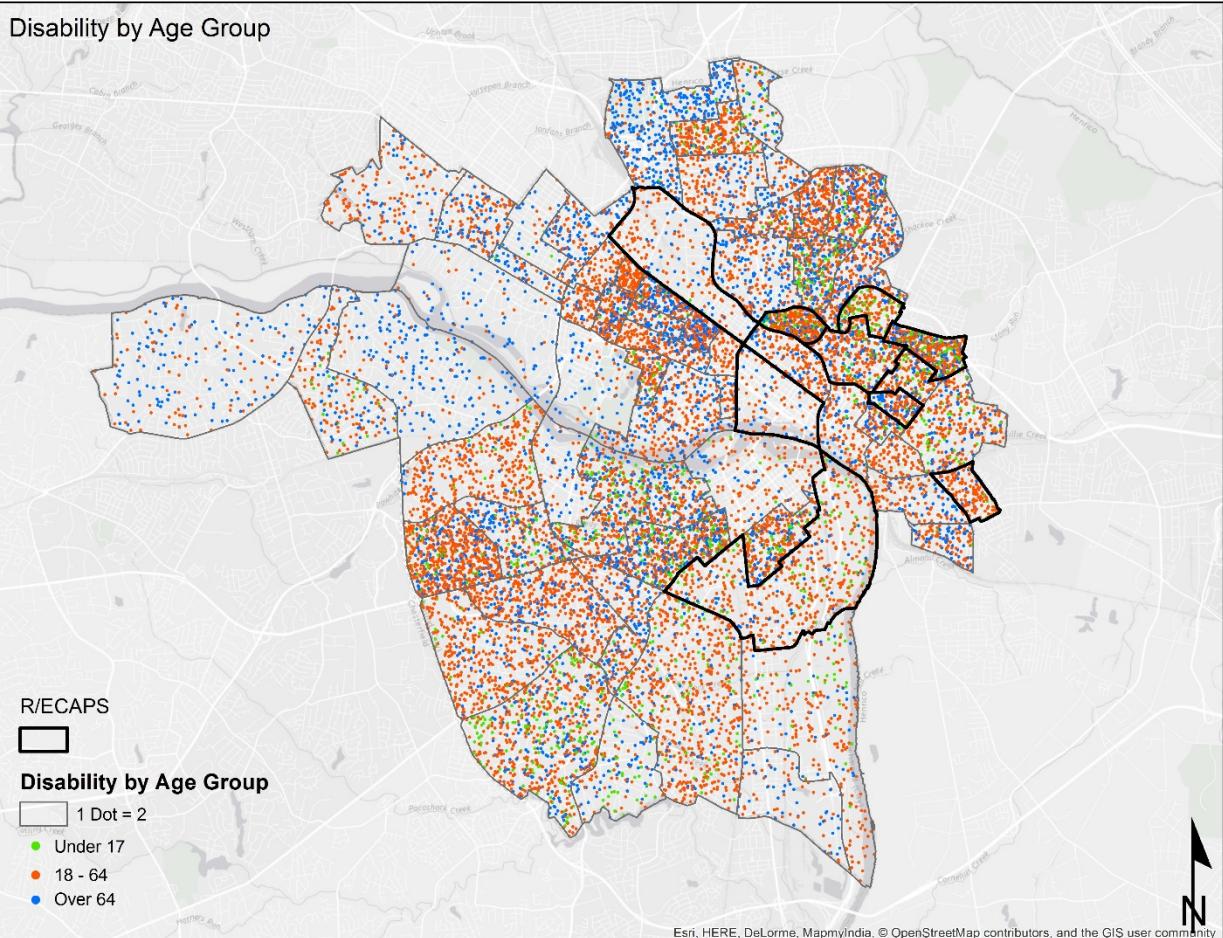
	<b>(Richmond, VA CDBG, HOME, ESG) Jurisdiction</b>	
<b>Age of People with Disabilities</b>	<b>#</b>	<b>%</b>
age 5-17 with Disabilities	2,483	1.29%
age 18-64 with Disabilities	19,764	10.29%
age 65+ with Disabilities	9,266	4.83%

<sup>1</sup> AFFH-T Table 13 and 14.

Map 1: Disability by Type; 2009-2013



Map 2: Disability by Age Group; 2009-2013



Generally, the distribution of individuals with a disability by type do not appear to be disproportionately represented in R/ECAP neighborhoods. 16.9% of persons experiencing ambulatory difficulty reside in R/ECAPs, as are 15.6% of individuals experiencing cognitive difficulty, 14.9% of individuals experiencing ambulatory difficulty, 13.3% of individuals experiencing independent living difficulty, 12.8% of individuals experiencing self-care difficulties, and 12.2% experiencing hearing difficulty. However, examining disability by age group reveals a concentration of persons with a disability residing in R/ECAPs. 24% of persons between 5 and 17 years of age with a disability reside in R/ECAPs, as do 16.1% between 18 and 64 years of age with a disability, and 9.8% of persons 65 years or older.<sup>2</sup> Clearly there is a concentration of children with disabilities living in concentrated areas of poverty.

### **1. Housing Accessibility**

- a. *Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*
- b. *Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?*
- c. *To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?*

Persons with disabilities have unique housing needs, principal of which is accessibility. Accessible housing can mean many different things. It can range from adding a ramp to the front door to fully accessible housing that meets American National Standards Institute (ANSI) standards. People with specific disabilities have specific needs. Someone with rheumatoid arthritis may not need a roll-in shower but will need levers instead of knobs on doors and faucets. Someone who is deaf may need smoke detectors and doorbells that use strobe lights instead of sounds.

Federal and state fair housing law require “covered multi-family dwellings” designed for first occupancy after March 13, 1991 to meet certain standards for accessibility.<sup>3</sup> A covered multi-family dwelling is a building with four or more dwelling units. If a building meeting this definition has one or more elevators then all of the units must meet the standards for accessibility. If a building meeting this definition does not have an elevator, the ground floor units must meet the accessibility requirements. Five percent of the units in public housing must be accessible to people with disabilities.

A significant portion of the city’s multi-family housing was constructed before 1991 exempting it from the accessibility requirements under the Fair Housing Act. Several people interviewed for this project indicated that there is a shortage of safe, accessible, and affordable housing for people with disabilities in the city. Additionally, income limitations and limits on mobility mean that many people with disabilities most often must rely on rental housing. The most affordable rental housing in the city is often found in older neighborhoods. This housing is generally not accessible because it is frequently accessed by stairs and may be situated on uneven terrain or has sidewalks lacking curb cuts. One of the six authorized expenditures of the City's Affordable Housing Trust Fund are those used to implement universal design principles and accessibility for disabled persons. In the first two-cycles of funding two

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<sup>2</sup> Based on Geospatial analysis of HUD data by HOME.

<sup>3</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/disabilities/fhefhag](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/fhefhag)

projects received \$90,000 to aid in increasing residential accessibility for 44 households. Overall 17% of the funding has gone to Seniors and people with disabilities.<sup>4</sup>

While retrofitting existing structures for full accessibility can be very expensive, there are many inexpensive features that can increase accessibility (which can, of course, also be applied to new construction). The concept of universal design involves the use of design elements that work for everyone, not just people with disabilities. Common universal design elements include:

- building wider doorways - allows wheelchairs to pass through, but also makes moving furniture easier;
- installing levers instead of knobs on doors so that a door may be opened by the hand, wrist or elbow - of a person with a disability or a person with their arms full of laundry or groceries; and
- making sure kitchens and bathrooms are large enough to allow wheelchair access, with appliances and doors placed for ease of use – designs which benefit all users.

In most new construction, many universal design features can be incorporated at little or no cost. As the City works to redevelop its public housing inventory and incentivize the development of affordable and accessible rental housing throughout the city, it must encourage the use of universal design features in private market development and require them to the greatest extent possible in City funded projects. The City's Affordable Housing Trust Fund states that one purpose of the Trust Fund is to "implement universal design features principles and accessibility for disabled persons."<sup>5</sup> Ensuring the construction of housing accessible to all will do much to serve the various housing needs of city residents for many generations while also working to deconcentrate poverty and increase neighborhood diversity.

In 2014 Housing Opportunities Made Equal of Virginia in partnership with the National Fair Housing Alliance filed a lawsuit alleging discrimination against persons with disabilities in the construction of new multifamily housing. Subsequent tests revealed similar trends – the design and construction of new multifamily housing frequently violate the Fair Housing Act. The settlement of this complaint helped HOME establish an accessibility fund to help retrofit other homes throughout Richmond.

## **2. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

- a. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*
- b. *Describe the range of options for persons with disabilities to access affordable housing and supportive services.*

In the Olmstead Supreme Court decision, the Court ruled that "states are required to place persons with mental disabilities in community settings rather than in institutions when the State's treatment professionals have determined that community placement is appropriate, the transfer from institutional care to a less restrictive setting is not opposed by the affected individual, and the placement can be reasonably accommodated, taking into account the resources available to the State and the needs of others with mental disabilities."

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<sup>4</sup> The City of Richmond Affordable Housing Trust Fund. 2015-2016 Impact Report.

<sup>5</sup> City Ordinance, Sec. 58-103, Purpose, Adopted, July 23, 2012.

### **3. Disparities in Access to Opportunity**

- a. *To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:*
  - i. *Government services and facilities*
  - ii. *Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)*
  - iii. *Transportation*
  - iv. *Proficient schools and educational programs*
  - v. *Jobs*
- b. *Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*
- c. *Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.*

Persons with disabilities often require reasonable accommodations or reasonable modifications to their housing to make it accessible and livable. Reasonable modifications are physical changes to existing housing that enable a person with a disability to have the same full use and enjoyment of the dwelling, and its associated common areas and amenities as persons without disabilities. Reasonable accommodations are changes to rules, policies, procedures, and practices or changes in the way services are provided. Depending on the type of disability, the type of accommodation or modification needed to live comfortably may range from the installation of grab bars in a bathroom, the assistance of a service animal, the installation of an accessibility ramp, etc.

According to the 2013 Fair Housing Trends Report by the National Fair Housing Alliance, claims, complaints, and case filings based on disability-based discrimination far exceeded all other protected classes.<sup>6</sup> Not surprisingly, disability related fair housing complaints filed with the Virginia Fair Housing Office that occurred in the City of Richmond accounted for the largest percentage (35%) of complaints from 2006 to 2012. As the population of the greater Richmond region is projected to age over the next 20 years, the demand for affordable accessible housing, as well as supportive services will increase substantially. The need for ongoing fair housing education and enforcement is one way to ensure that all city residents have access to housing that best meets their needs.

### **4. Disproportionate Housing Needs**

- a. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.*

### **5. Additional Information**

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.*
- b. *The program participant may also describe other information relevant to its assessment of disability and access issues.*

Design and construction practices continue to constrain the supply of accessible housing in the city and beyond.

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<sup>6</sup>Modernizing the Fair Housing Act for the 21st Century: 2013 Fair Housing Trends Report. National Fair Housing Alliance. April 11, 2013.

## **6. Disability and Access Issues Contributing Factors**

**Contributing Factor:** Lack of affordable, accessible housing in a range of unit sizes

**Prioritization:** Moderate

**Justification:**

The most affordable housing in the city is also some of the oldest and often excluded from HUD's definition of covered multi-family dwellings. This fact makes retrofitting expensive thereby constraining the supply of affordable housing even more for persons with disabilities.

**Contributing Factor:** Limited assistance for housing accessibility modifications

**Prioritization:** Moderate

**Justification:**

The number of reasonable modification and accommodation requests received by HOME has prompted the organization to hire a disability coordinator. This additional resource will help persons with disabilities navigate the request process and ensure that their right to such actions under the Fair Housing Act are not violated. Additionally, though limited funding exists through HOME's Accessibility Fund, it is not nearly fully capitalized to meet existing need to help low-income persons with disabilities pay for reasonable modifications.

**Contributing Factor:** New multi-family residential units in non-compliance with fair housing laws.

**Prioritization:** High

**Justification:**

Design and Construction investigations conducted by Housing Opportunities Made Equal found several instances of non-compliance with new, multi-family residential construction throughout the city.

**Contributing Factor:** Private Discrimination

**Prioritization:** Moderate

**Justification:**

In a series of fair housing tests conducted by HOME to determine if landlords were willing to follow their legal obligation to accommodate prospective disabled tenants by reasonably changing policies. Overall, most of the landlords stated a willingness to accommodate the reasonable requests to enable a disabled person to reside in the unit. However, even if accommodations are allowed, charging fees for such accommodations rises to the level of housing discrimination.

Another series of tests conducted to determine if landlords were willing to follow their legal obligation to allow for prospective disabled tenants to reasonably modify the units. Unlike reasonable accommodations, reasonable modifications involve a physical change to the home. Most reasonable modification requests were honored though many took additional time to check company policy.

## **E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

1. *List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.*
2. *Describe any state or local fair housing laws. What characteristics are protected under each law?*
3. *Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.*

The Civil Rights Act of 1866 first recognized that “all citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property.” These laws lay more or less dormant for 100 years. In the wake of the assassination of Dr. Martin Luther King, Jr., U.S. Congress passed the Civil Rights Act of 1968. Title VIII of this law – the Fair Housing Act – specifically recognized that minorities experienced unequal access to housing and outlawed discrimination in housing transactions based on race, color, religion and national origin. Three more protected classes were added in subsequent decades: sex in 1974 and familial status and handicap in 1988. The Virginia Fair Housing law – enacted in 1972 and amended in 1991 to add elderliness (defined as people 55 years of age and older) as a protected class – is considered substantially equivalent to federal nondiscrimination provisions.

The most important part of the Fair Housing Act is section §3604, which states:<sup>1</sup>

*To refuse to sell or rent after the making of a bonafide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status or national origin.<sup>2</sup>*

This provision has been interpreted to apply to the advertising, rental, sale and appraisal of residential real estate, as well as mortgage lending and homeowner’s insurance services and transactions. A broader range of housing practices which have the effect of limiting protected classes from accessing housing (e.g., exclusionary zoning, racial steering, redlining practices, and citizenship requirements) are also considered illegal under the Fair Housing Act.

The 1988 amendment added discrimination on the basis of disability and required that reasonable accommodations be made, “in rules, policies, practices, or services when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.”<sup>3</sup> The amendment also required new multifamily construction to meet accessibility requirements in public areas and individual dwelling units.

Working in concert with the Fair Housing Act, the Housing and Community Development Act of 1974 expressly states that the primary objective of Community Development Block Grants is the development of viable urban communities through the provision of decent housing, a suitable living environment and

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<sup>1</sup> Daniel Lauber, District of Columbia Analysis of Impediments to Fair Housing Choice 2006-2011. Planning Communications. April 2012.

<sup>2</sup> 42 U.S.C. §3604

<sup>3</sup> Ibid.

economic opportunities for persons with low to moderate income.<sup>4</sup> As such, HUD is obligated to affirmatively further fair housing by actively promoting wider housing opportunities for all persons while maintaining a nondiscriminatory environment in all aspects of public and private markets. Those obligations include particular emphasis to avoid concentrating assisted persons in areas with high proportions of low and moderate-income persons.

Courts have interpreted the AFFH obligation as requiring HUD-funded activities to foster nondiscrimination as well as to address the effects of past discrimination:

*...every court that has considered the question has held or stated that Title VIII [of the Civil Rights Act of 1968] imposes upon HUD an obligation to do more than simply refrain from discriminating (and from purposely aiding discrimination by others) ... This broader goal [of truly open housing] ... reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases.<sup>5</sup>*

In short, it is the policy of HUD to support and develop open housing markets free of discrimination and to ensure its programs advance social and economic integration.

### ***Covered Transactions***

The array of housing transactions covered by fair housing laws includes, among others, the advertising, rental, sales, and appraisal of residential real estate, as well as mortgage lending and homeowner's insurance services and transactions. All stages of each type of transaction are covered. To illustrate, discrimination may occur in rental housing transactions at the time of application or approval, in the contract terms and conditions, in the unit assignment, or in how routine and special maintenance needs are met. In terms of housing sales, discrimination may happen in whether or how an agent provides housing options, in the offer and acceptance of a contract, in the mortgage loan processing and approval process, or in the securing of homeowner's insurance.

### ***Types of Discrimination***

There are three general ways in which discrimination can occur: overt statement, differential treatment, and disparate impact. In an overt statement, a landlord may say, for example, that she will not rent to men because she believes they are messy. This is a clear statement of discrimination on the basis of gender. Differential treatment occurs when a housing provider does not make an overtly discriminatory statement but, for example, tells a black man there are no vacancies and later tells a white man there is a vacancy. Disparate impact occurs when seemingly legal and neutral policies have a disproportionately negative impact on a protected class. To illustrate, a landlord may have a policy of not renting to students that is applied to everyone. However, the only university in the area is a historically black university where 95% of the students are black. The landlord's policy is neutral, in that it does make any reference to race or any other protected class. Yet, in an area where the vast majority of the students are black, the otherwise neutral policy will have a disproportionate effect on blacks. The discriminatory effect of the otherwise neutral policy violates fair housing laws regardless of the intent of the landlord.

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<sup>4</sup> 42 U.S.C. §5301

<sup>5</sup> NAACP v. Secretary of Housing & Urban Development, 817 F. 2d 149 (Court of Appeals, 1st Circuit 1987).

### ***Administrative Enforcement of Fair Housing Laws***

The federal Fair Housing Act provides for a free administrative process to investigate complaints of discriminatory housing practices and directs the government to litigate in appropriate cases on behalf of victims of discrimination through enforcement agencies at the federal, state and local levels. It allows for monetary compensation and affirmative relief for complainants if violations are proven. The U.S. Department of Housing and Urban Development (HUD) is charged with enforcing the federal Fair Housing Act across the nation, with the support of the U.S. Department of Justice (DOJ). The law also gives injured parties, including organizations, the right to file their own lawsuits.

In Virginia, the Department of Professional and Occupational Regulation (DPOR) is home to the Virginia Fair Housing Office (VFHO), which receives and investigates fair housing complaints under the state law. Due to the substantial equivalency of state law to federal law, VFHO also accepts referrals of complaints initiated through HUD and investigates them under the state law. The Virginia Fair Housing Law requires the Office of the Attorney General to provide legal support and litigation services to the Virginia Fair Housing Office. The VFHO is located in Richmond, Virginia.

### ***The Role of Local Government in Fair Housing***

Richmond has a Fair Housing Ordinance which states:

*It is the policy of the city to provide for fair housing throughout the city, to all its citizens, regardless of race, color, religion, national origin, sex, age, marital status, presence of children in the family or disability, and to that end to prohibit discriminatory practices with respect to residential housing by any person or group of persons, in order that the peace, health, safety, prosperity and general welfare of all the inhabitants of the city may be protected and ensured. To this end, the city encourages the enforcement, by both public and private agencies, of laws prohibiting discriminatory practices as defined in this article. This article shall be deemed an exercise of the police power of the state for the protection of the people of the state as granted to and conferred upon the city.<sup>6</sup>*

The substantive provisions of Richmond's fair housing ordinance – the protected classes, prohibited acts, and exemptions – are very similar to the Virginia and federal fair housing laws (marital status is an additional protected class). The Richmond fair housing ordinance also provides for enforcement by private action in the circuit court of the city for injunctive relief and money damages or by filing a fair housing complaint.

While the Richmond ordinance provides coverage and rights for victims of housing discrimination similar to those in the federal and state fair housing laws, the relief available to victims is very limited. In the absence of a voluntary settlement, the remedy under the ordinance is limited to a cease and desist order. There are no provisions for meaningful remedies or damages for victims of discrimination and there is no incentive for victims of discrimination to utilize the City ordinance.

Effective enforcement and remedies for city victims of housing discrimination rely on referrals to the state and federal administrative processes or private legal action. The absence of a City process means that an effective referral system to the state and federal enforcement process is essential. Since the

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<sup>6</sup> City of Richmond, *Richmond, Virginia (Code 1993, § 16-91(a))*.

state and federal complaint process function reasonably well, we see no need for the City to add its own administrative process, which would be a duplication of effort.

#### **4. Additional Information**

- a. *Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.*
- b. *The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.*

Housing Opportunities Made Equal of Virginia, Inc. (HOME) is 501(c)3 nonprofit corporation and HUD approved counseling agency. Founded in 1971 to combat housing discrimination in Richmond, VA, HOME has expanded to provide a variety of programs and services designed to ensure equal access to housing for all Virginians. HOME's Center for Fair Housing (CFH) works with housing consumers, providers, and government agencies to protect the housing choices of all people from external barriers and limitations such as housing discrimination. The Center for Housing Counseling and Education (CHCE) teaches individuals and families how to take advantage of new housing opportunities by helping impart the knowledge and financial skills needed to become successful homeowners and tenants.

### **Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

**Contributing Factor:** Lack of Resources for fair housing agencies and organizations.

**Prioritization:** LOW

**Justification:**

Given limited local governmental resources, funding for fair housing enforcement is often difficult to secure. However, the City of Richmond has a long standing relationship with Housing Opportunities Made Equal of VA, Inc. (HOME) to provide a variety of resources including Fair Housing Testing, and Education and Outreach on Fair Housing Laws to Minority communities, specifically foreign-born and LEP populations. Additionally, the City engages HOME to administer a variety of programs which serve to Affirmatively Further Fair Housing including Down-payment assistance for low-income, first-time home buyers, Mobility Counseling, Foreclosure Prevention, and a comprehensive curriculum on credit and personal finance. HOME offers all programs in Spanish and enlists the use of interpreters to aid in communicating with other language speakers.

## VI. Fair Housing Goals and Priorities

	Fair Housing Prioritization	Consolidated Plan Priority	OCWB Priority	Time*	Impact^
<b>Disability and Access</b>					
New multi-family residential units in non-compliance with fair housing laws.	3	3		2	12
Limited assistance for housing accessibility modifications	2	3		2	10
Lack of affordable, accessible housing in a range of unit sizes	2	3	3	1	8
Private Discrimination	2			1	2
<b>Disparities in Access to Opportunity</b>					
Economic and Social Isolation - Poverty	3	3	3	1	9
Lack of Regional Public Transit	3		3	1	6
Public Opposition	3			2	6
Current Federal Climate	2			3	6
Public Education Financial Support	2		3	1	5
Coordinated Investment	2	3		1	5
Racial Disrimination	3			1	3
<b>Disproportionate Housing Needs</b>					
Disparate effect of City policies	2	3		3	15
Lack of Regional Cooperation	2	3		2	10
Current Federal Climate	3			3	9
Lack of Regional Public Transportation	3		3	1	6
Discrimination	2			1	2
Fiscal Constraints	2			1	2
<b>Fair Housing</b>					
Lack of Resources for fair housing agencies	1	3		1	4
<b>Publicly Supported Housing</b>					
Historical Site Selection	3	3	3	1	9
Lack of Public Investment	3	3	3	1	9
Source of Income Discrimination	2			2	4
Community Opposition	1			2	2
<b>RECAPs</b>					
Public Education	3		3	2	12
Limited Transit Access	3	3	3	1	9
Employment Mismatch	2	3	3	1	8
Private Discrimination	3			2	6
Lack of Investment in Specific Neighborhoods	2	3		1	5
<b>Segregation</b>					
Public Education	3		3	2	12
Lack of Regional Cooperation	2	3		2	10
Lending Discrimination	2	3		2	10
Lack of Regional Transportation	3	3	3	1	9
Lack of Private Investment in Specific neighborhoods	2	3	3	1	8
Racial Discrimination	3	3		1	6
Public Investments	2	3		1	5
Location and type of housing	2	3		1	5

\*Time factor by length of time needed to address: 1 = Longterm, 2 = Moderate, 3 = Short

<sup>^</sup> Impact 1=Lowest, 15= Highest

Factors were ranked according to the Fair Housing Prioritization, 2016-2020 Consolidated Plan, and Office of Community Wealth Building Priorities. These scores were added together and multiplied by the length of time needed to address ranking. The impact score indicates which factors are most likely to have the most immediate impact and/or in some form are currently a priority.

The matrix above was used to rank those Fair Housing Priorities that will have the greatest impact on addressing identified contributing factors to fair housing issues, are funding or policy priorities as outlined in the City's 2016-2020 Consolidated Plan or are policy priority areas of the Office of Community Wealth Building policy. Using the median score, priorities were then delineated into top-tier priorities. If a focus area did not have a priority that scored above the median value of priorities it was included in the top -tier priorities.

First-Tier Priorities					
	Fair Housing Prioritization	Consolidated Plan Priority	OCWB Priority	Time*	Impact^
<b>Disability and Access</b>					
New multi-family residential units in non-compliance with fair housing laws.	3	3		2	<b>12</b>
Limited assistance for housing accessibility modifications	2	3		2	<b>10</b>
Lack of affordable, accessible housing in a range of unit sizes	2	3	3	1	<b>8</b>
<b>Disparities in Access to Opportunity</b>					
Economic and Social Isolation - Poverty	3	3	3	1	<b>9</b>
<b>Disproportionate Housing Needs</b>					
Disparate effect of City policies	2	3		3	<b>15</b>
Lack of Regional Cooperation	2	3		2	<b>10</b>
Current Federal Climate	3			3	<b>9</b>
<b>Fair Housing</b>					
Lack of Resources for fair housing agencies	1	3		1	<b>4</b>
<b>Publicly Supported Housing</b>					
Historical Site Selection	3	3	3	1	<b>9</b>
Lack of Public Investment	3	3	3	1	<b>9</b>
<b>RECAPs</b>					
Public Education	3		3	2	<b>12</b>
Limited Transit Access	3	3	3	1	<b>9</b>
Employment Mismatch	2	3	3	1	<b>8</b>
<b>Segregation</b>					
Public Education	3		3	2	<b>12</b>
Lack of Regional Cooperation	2	3		2	<b>10</b>
Lending Discrimination	2	3		2	<b>10</b>
Lack of Regional Transportation	3	3	3	1	<b>9</b>
Lack of Private Investment in Specific neighborhood	2	3	3	1	<b>8</b>

First-Tier Priorities					
Goals	Discussion	Contributing Factor	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible Program Participants
<b>Goals: Increase Access to Accessible Housing</b>					
Goal 1. Provide Fair Housing training to building inspectors.	The Fair Housing Act is clear in making new, qualified multi-family housing accessible. Properly trained building inspectors will ensure that the City is not only committed to its residents but also its goal of increasing the supply of accessible housing.	New multi-family residential units in non-compliance with fair housing laws.	Disproportionate impact on Minority and Low-income households, and persons with disabilities	1-2 years: completion of training	Planning and Development Review
Goal 2. Ensure that appropriate resources exist and can be utilized for reasonable modifications under the Fair Housing Act.	Due to numerous factors, reasonable modifications can overly-burden individuals with disabilities. Ensuring that resources are equitably allocated will do much in allowing individuals with disabilities housing choice.	Limited assistance for housing accessibility modifications	Disproportionate impact on Minority and Low-income households, and persons with disabilities	year 1 and ongoing: report on findings	Economic and Community Development
Goal 3. Adhere to the strategies to remove barriers to affordable housing as outlined in the City's 2016-2020 Consolidated Plan .	Increasing the share of affordable and accessible housing ensures residential choice	Lack of affordable, accessible housing in a range of unit sizes	Disproportionate impact on Minority and Low-income households, and persons with disabilities	Ongoing; Include report on progress in annual action plan	Economic and Community Development: RRHA
<b>Goals: Decrease Racial/Ethnic Disparities in Access to Opportunity</b>					
Goal 1. Continue to support the work of the Office of Community Wealth Building and explore increasing funding and resource capacity.	The City would show substantial commitment to the goals of Affirmatively Furthering Fair Housing by ensuring that the Office of Community Wealth Building is adequately resourced to meet its goals	Economic and Social Isolation - Poverty	Segregation and RECAPs	Ongoing	City Council, Economic and Community Development, RRHA, others as needed
Goal 2. Explore the feasibility of making the Office of Community Wealth building the lead Affirmatively Furthering Fair Housing agency.	The Office of Community Wealth Building already serves as the City's coordinating body to address poverty in the City, much of which falls squarely within the spirit of Affirmatively Furthering Fair Housing. Having the ability to strategically plan and collaborate with the many City Departments is a unique position that should be taken advantage of.		Segregation and RECAPs	1 year; address internally, report decision in CAPER	Economic and Community Development,
<b>Goals: Decrease Disproportionate Housing Needs Among Minority and Low-Income Households</b>		Disproportionate Housing Needs			
Goal 1. Assess existing code enforcement policies for equitable impact. If practical, implement equitable code enforcement policies, practices and procedures.	Existing Code Enforcement Policies may disproportionately impact minorities and low-income households, and persons with disabilities.	Disparate effect of City policies	Disproportionate impact on Minority and Low-income households, and persons with disabilities; Housing Burden	1 year; issue report on findings to ECD	Planning and Development Review
Goal 2. Allocate resources to address inequities in code enforcement policies.	Providing resources to help defray code enforcement for qualifying households will help limit disproportionate impact and constrain community blight		Disproportionate impact on Minority and Low-income households, and persons with disabilities; Housing Burden	ongoing: address internally, report findings to ECD, Wealth Building	Office of Community Wealth Building, Economic and Community Development
Goal 3. Assess the current Tax Abatement Program through an equity lens to ensure that it is meeting the needs of disinvested neighborhoods and not serving as a tax benefit for upper-income households and thus constraining a legitimate source of City revenue.	The existing Tax Abatement Program may severely constrain resources which could be used to address housing priorities.		Disproportionate impact on Minority and Low-income households, and persons with disabilities; Housing Burden	1 year; report on findings to ECD	Assessor's Office, Economic and Community Development
Goal 4. Explore and pursue the feasibility of conducting a regional Assessment of Fair Housing.	The lack of regional cooperation is a complex issue that scored high as a Fair Housing contributing factor and is a priority found among several goals outlined in the City's Consolidated Plan. Lack of regional collaboration has disproportionately impacted low-income and Minority households. Increase regional fair housing planning and maximize capacity, while serving as a regional planning catalyst. The City has the latest due date and is the largest recipient of entitlement funding and thus would be the logical lead agency.	Lack of Regional Cooperation	Disproportionate impact on Minority and Low-income households, and persons with disabilities; Housing Burden; RECAPs; Segregation	1-2 years; Completion of Regional AFH	Office of Community Wealth Building, Economic and Community Development
					107

Goal 5. Allocate resources for key City departments including Code Enforcement, Department of Health and Human Services, Office of Community Wealth Building, and Economic and Community Development to undergo social equity and racial/ethnic bias training.	Racial and Social Justice Equity training will serve to address the needs of minority communities, particularly those LEP and foreign-born households and individuals	Current Federal Climate	Housing discrimination based on national origin	1-5 years; dependent upon departmental resources; completion of training	City Council, Economic and Community Development, RRHA, others as needed
Goal 6. Explore and adopt Race and Social Justice Equity Models of strategic planning, service delivery and culture when feasible.	Adopting Race and Social Equity Models of Strategic Planning and thinking will ensure the equitable allocation of resources to those community members most in need.		Discrimination based on national origin, race, religion, color, sex, gender, disability	1-5 years; adoption of model	City Council, Economic and Community Development, RRHA, others as needed
<b>Goals: Expand Fair Housing Capacity</b>					
Goal 1. Explore sources of additional funding for targeted Fair Housing programs that are under-capitalized and could have immediate impacts on identified fair housing issues.	Collaborating with qualified fair housing agencies to ensure that the city is responsive to the Fair Housing needs of its residents with disabilities	Lack of Resources for fair housing agencies	Housing accessibility and choice	year 1 and ongoing; allocation in annual plans; report annually CAPER	Economic and Community Development
<b>Goals: Deconcentrate Publicly Supported Housing</b>					
Goal 1: Continue to pursue funding opportunities for equitable redevelopment of Publicly Assisted Housing in a variety of neighborhoods.	Continuing to work to overcome publicly supported housing segregation and access to opportunity is the only viable long-term solution to overcoming historic discriminatory site selection and ensure that all residents have access to adequate, affordable housing and the opportunities that go with it.	Historical Site Selection; Lack of Public Investment	Publicly assisted housing segregation, limited access to opportunity	ongoing; monitor units developed; report annually; CAPER	City Council, Economic and Community Development, Office of Community Wealth Building, RRHA, others as needed
Goal 2. Ensure that new, sustainable, and dedicated sources of funding are found for the City's Affordable Housing Trust Fund.	The City's Affordable Housing Trust Fund is undercapitalized to truly be effective in ensuring that the affordable housing needs of the City are met. Initial recommendations set a goal of \$10 million.	Lack of Public Investment	Adequate Supply of affordable and accessible Housing	1-3 years; ongoing; increase in funding	City Council, Economic and Community Development, Office of Community Wealth Building.
<b>Goals: Reduce Concentrated Areas of Racial/Ethnic Poverty</b>					
Goal 1. Continue to allocate resources to the identification of educational needs and resource gaps. Address identified gaps.	Improved Educational outcomes are a priority focus of the Office of Community Wealth Building. Disproportionate access to high quality education among minority, low-income, and students with disabilities is an identified contributing factor to several fair housing issues.	Public Education	School segregation; Disproportionate impact of low-income, minority, disabled, and LEP students; Access to opportunity.	1-3 years; ongoing; report on educational outcomes	Office of Community Wealth Building
Goal 2. Continue to secure funding and exploit opportunities to address the lack of regional transit.	Regional Transit has the potential to be hugely transformative as the City works to connect low-income residents to resource pathways that will pull them out of poverty	Limited Transit Access	Concentrated areas of Racial/Ethnic Poverty, Housing Burden, Access to Housing, Access to Opportunity	ongoing until reality; report annually	Office of Community Wealth Building
Goal 3. Continue to allocate resources to the strengthening of workforce development including entrepreneurial efforts.	Workforce development and job readiness is a key priority of the Office of Community Wealth Building. It is also a contributing factor to various fair housing issues.	Employment Mismatch	Concentrated areas of Racial/Ethnic Poverty, Housing Burden, Access to Housing, Access to Opportunity, Disproportionate impact on low-income, minority households.	ongoing; report annually on progress	Office of Community Wealth Building
<b>Goals: Decrease Residential Segregation</b>					
See Goal 1 under RECAPs		Public Education			
See Goal 1 under RECAPs		Lack of Regional Cooperation			
Goal 2. Continue to provide resources for downpayment assistance and other forms of financial education.	Lending Discrimination has had grave implications for minority communities in Richmond, serving to limit housing options, wealth accumulation, and access to opportunity.	Lending Discrimination	Limits housing choice for minority residents, constraint wealth and limits opportunity	ongoing; report annually CAPER	Economic and Community Development
See Goal 2 under RECAPs		Lack of Regional Transportation			
Goal 3. Ensure that the City's tax delinquent sale process has equitable outcomes and doesn't lead to displacement.	The City has been working diligently to get severely tax delinquent residential properties back into the private market. It is imperative that this process have equitable outcomes	Lack of Private Investment in Specific neighborhoods	Has the potential to drive displacement	1 year; report of findings; CAPER	Assessor's Office, Economic and Community Development