

2019 Analysis of Impediments to Fair Housing Choice

DRAFT – April 2019

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

For Program Years 2019 to 2023

CITY OF GAINESVILLE, GEORGIA

Community Development Department

DRAFT – April 2019

Prepared for the City of Gainesville by
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TABLE OF CONTENTS

Chapter 1. Introduction	4
Affirmatively Furthering Fair Housing	4
Definitions	5
Data Sources	6
Chapter 2. Community Participation Process.....	9
Community Engagement Overview.....	9
Community Engagement Results	11
Chapter 3. Socioeconomic Profile	26
Demographic Profile.....	26
Racially and Ethnically Concentrated Areas of Poverty.....	32
Chapter 4. Segregation & Integration	35
Race and Ethnicity	35
Segregation Levels.....	41
National Origin and Limited English Proficiency Population.....	43
Chapter 5. Access to Opportunity	46
Overview of HUD-Defined Opportunity Factors	47
Education.....	50
Employment	52
Transportation	56
Poverty.....	60
Environmental Health.....	62
Summary	66
Chapter 6. Housing Profile	67
Housing Supply Summary.....	67
Housing Costs and Affordability.....	73
Housing Needs	73
Homeownership and Lending.....	80
Zoning, Affordability, and Housing Choice	88
Chapter 7. Publicly Supported Housing	97
Supply and Occupancy	98
Geography of Supported Housing.....	100
Policy Review	103

Chapter 8. Housing for People with Disabilities106
Residential Patterns..... 106
Accessible Housing Supply and Affordability 109
Zoning and Accessibility 110

Chapter 9. Fair Housing Activities114
Fair Housing Resources 114
Fair Housing Complaints 115
Fair Housing Lawsuits and Litigation 119
Past Fair Housing Goals and Related Activities..... 121

Chapter 10. Identification of Impediments.....123

DRAFT

CHAPTER I.

INTRODUCTION

AFFIRMATIVELY FURTHERING FAIR HOUSING

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulates that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provides publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using this tool in 2017; however, a 2018 HUD notice extended that deadline until at least October 2020. The notice further required that grantees instead prepare and keep on file a current “Analysis of Impediments to Fair Housing Choice” (AI).

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

Mosaic Community Planning assisted the City of Gainesville with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but is also fully compliant with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, the City of Gainesville used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

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

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form”

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) – HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps, AFFHT0004, which was released in November 2017. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report or available online at <https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf>.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous local plans and works of research conducted for and by the City of Gainesville, including:

- City of Gainesville *2014-2018 Consolidated Plan for HUD Programs*
- City of Gainesville *Annual Action Plans* for Program Years 2014 through 2018
- City of Gainesville *Consolidated Annual Performance and Evaluation Reports (CAPERs)* for Program Years 2012 through 2017
- *Accessible Housing: An Analysis of Impediments to Fair Housing Choice in Gainesville, 2011*
- City of Gainesville *2040 Comprehensive Plan, 2017*
- Georgia Mountains Regional Commission *2017-2022 Comprehensive Economic Development Strategy and Regional Plan, 2017*

- *Downtown Gainesville Renaissance Strategic Vision & Plan, 2015*
- *City of Gainesville Westside TAD Redevelopment Plan, 2018*
- *City of Gainesville Midtown Gainesville Redevelopment Plan & Tax Allocation District, 2010*
- *City of Gainesville Bradford-Ridgewood NPU Vision, Goals & Objectives Statement, 2010*
- *City of Gainesville Fair Street NPU Vision, Goals & Objectives Statement, 2008*
- *United Way of Hall County Community Game Plan, 2018*

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CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Gainesville. The City used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including three public meetings, four focus groups, stakeholder interviews, and a communitywide survey.

Public Meetings

Three meetings open to the general public were held to inform the community about and gather information for the Analysis of Impediments to Fair Housing Choice. Each meeting began with a short presentation providing an overview of the AI followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in the region. Spanish interpretation was provided at all three meetings. A total of 23 members of the public attended one of the three meetings. Meeting dates, times, and locations are shown below:

Public Meeting #1	Public Meeting #2	Public Meeting #3
Saturday, January 26, 2019	Monday, January 28, 2019	Thursday, January 31, 2019
10 AM	6 PM	6 PM
Gainesville-Hall County Senior Life Center 434 Prior Street Gainesville, GA 30501	Gainesville Exploration Academy – Lunchroom 1145 McEver Road Gainesville GA 30504	Gainesville High School – Lunchroom 830 Century Place Gainesville, GA 30501

Focus Groups

In addition to public meetings, focus groups were also conducted with key stakeholder groups representing viewpoints relevant to the development of the Analysis of Impediments to Fair Housing Choice. Like the public meetings, the focus groups began with an overview of the Analysis of Impediments to Fair Housing Choice and then moved into a facilitated discussion of fair and affordable housing needs, neighborhood conditions, and community resources in Gainesville. A total of twenty-seven (27) people participated in a focus group. Meeting dates, times, and locations are shown below:

Focus Group #1**Senior Life Center Advisory Board & Vision
2030 Wisdom Keepers**

Wednesday, January 9, 2019

9 AM

Gainesville-Hall County Senior Life Center
434 Prior Street, Gainesville, GA 30501**Focus Group #3****Gainesville Nonprofit Development
Foundation Board**

Wednesday, January 9, 2019

3:30 PM

Community Development Office
311 Henry Ward Way, SE, Gainesville, GA 30501**Focus Group #2****City Manager and Community and Economic
Development Department Staff**

Wednesday, January 9, 2019

11:30 AM

Community Development Office
311 Henry Ward Way, SE, Gainesville, GA 30501**Focus Group #4****One Hall Housing/Financial Stability
Committee**

Wednesday, January 16, 2019

11 AM

United Way of Hall County
527 Oak Street, Gainesville, GA 30501**Stakeholder Interviews**

During the January and February 2019, individual stakeholder interviews were held at the City's Community and Economic Development Department and by telephone. Stakeholders were identified by City of Gainesville Special Projects Division staff, and represented a variety of viewpoints, including fair housing/legal advocacy, housing, affordable housing, real estate and mortgage lending, community development and planning, transportation, education, homelessness, civic organizations, services for low-income households, people with disabilities, seniors, and domestic violence victims, and others.

Interview invitations were made to more than 60 representatives, of whom 25 participated in interviews. Several invitees participated in other manners, such as by attending a public meeting or participating in a focus group. Organizations from which one or more representatives participated in development of this AI include:

- City of Gainesville City Council
- City of Gainesville City Management
- City of Gainesville Code Enforcement Division
- City of Gainesville Planning Division
- Community Service Center
- Disability Resource Center
- Family Promise of Hall County
- Gainesville City School System
- Gainesville-Hall County Senior Life Center Advisory Board
- Gainesville High School
- Gainesville Housing Authority
- Gainesville Nonprofit Development Foundation
- Gateway Domestic Violence Center
- Georgia Legal Services
- Georgia Mountains Regional Commission
- Hispanic Alliance Georgia
- Habitat for Humanity for Hall County
- Hall County Grants Division
- Keller Williams Realty
- My Sister's Place
- The Norton Agency
- One Gainesville United
- Purdy Real Estate
- United Way of Hall County
- Vision 2030 Wisdom Keepers

Community Survey

The fourth method of obtaining community input was a 24-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in English and Spanish from January 23 through March 1, 2019. Paper copies were available at the public meetings and focus groups, through local service providers, and at the City of Gainesville Community and Economic Development Department. A total of 38 survey responses were received.

Public Comment Period and Hearing

The City of Gainesville will hold a 30-day public comment period to receive comments on the draft Analysis of Impediments to Fair Housing Choice beginning in May 2019. During this time, copies of the draft report will be available for public inspection and residents and stakeholders can provide written comments to the Community and Economic Development Department. A public hearing to present key findings and receive comments will also be held in May.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible, including the general public, as well as nonprofits, service providers, housing providers, and others working with low and moderate income households and special needs populations. Notice was given to residents through an announcement in English and Spanish in the *Gainesville Times*, through press releases to local news outlets, and through flyers placed in public places. The *Times* ran two stories about the AI public meetings and provided a link to the online survey. English and Spanish flyers were emailed to more than 60 local housing and service providers and community development practitioners, both as outreach to these stakeholders and for distribution to their clients. Spanish interpretation was available at all meetings and was advertised on the meeting flyers. Meeting advertisements also noted that accommodations (including translation, interpretation, or accessibility needs) were available if needed; no requests for accommodations were received.

COMMUNITY ENGAGEMENT RESULTS

A total of 113 people participated in the community engagement process used to develop this AI. Twenty-five participated in interviews, 50 attended a public meeting or focus group, and 38 responded to the survey.

For the community participation process, the consulting team developed a standard question set for use in the public meeting and in stakeholder interviews. Listed below are the summarized comments from interview participants and meeting attendees, as well as a summary of survey results. All input was considered in development of this AI, and no comments or surveys were not accepted. Note that these comments do not necessarily reflect the views of the City of Gainesville or Mosaic Community Planning.

Public Meetings and Focus Groups

1. What are the greatest housing needs in the community?

- A need for truly affordable rental housing. Most places rent for \$800-\$1,000 per month and developers think that's affordable; there are no options at \$400-\$500. LIHTC developments are good, but aren't reaching lowest income groups.
- Affordable rental housing for seniors living on Social Security benefits and smaller units (1 bedrooms) that would be more affordable for seniors.
- There are plenty of options for middle and upper-middle class seniors, but no affordable options for lower income groups.
- Housing quality is an issue, but more so in the county. The City has stricter building codes.
- Housing quality and overcrowding is an issue in the city, especially for rental units. Continued code enforcement is needed in city neighborhoods.
- The City builds nice-looking houses that sell for around \$130,000, but only about 4-5 per year which doesn't answer the need; Habitat builds homes too, but not enough.
- Vacant and developable residential land. Have to look at areas that can be annexed in to the city or infill development opportunities.
- Areas where housing is needed: White Sulphur Road, Midtown redevelopment area, mill villages, near poultry factories
- Infrastructure to support affordable housing development / reduce development costs.
- Landlords refuse to accept vouchers – they “don't want that type.”
- Landlords with open minds about renting to felons.
- Just need more housing: rental and homeowner, 2-3 bedrooms.
- Mix of housing types, housing prices/rents, and uses.
- More accessory dwelling units.
- Down payment assistance and case management to help new homeowners keep and maintain their homes. Homeownership rate in the city is relatively low. There is a need for affordable and middle-market housing for homeownership.
- Education about the housing process – getting into housing (fees, credit scores, etc.) and staying housed (budgeting, bill paying, avoiding predatory lending, etc.)
- Homeownership assistance to help seniors and others maintain and rehab their homes and avoid deterioration of the housing stock. A clearinghouse of available assistance is needed.
- Physically accessible affordable housing for people with disabilities (interior and exterior accessibility of the housing units, accessibility of the property and neighborhood).
- As neighborhood revitalization occurs, gentrification is a potential issue.
- Hall County Schools estimate they serve 230 homeless students.
- Homelessness outreach, prevention, housing options. People stay in extended stay hotels, which can be crime hotspots.
- Homeless shelter/emergency housing and support for organizations that are providing homeless housing and services.

2. What do you believe are Gainesville's greatest community, economic development, or public service needs?
- Food deserts – access to quality food and grocery stores is needed in Downtown and Westside neighborhoods.
 - Ward 3 (southeast quadrant of the city) needs grocery store, pharmacy, and shopping centers but also needs more housing to support commercial development.
 - Sidewalks. Possible partnership between city and county to ensure continuity of sidewalks in areas that cross in and out of city limits.
 - Pocket parks.
 - Poor families need education and resources related to nutrition – this is foundational for health, school, success, and much more.
 - Existing recreation centers need more programming and the programming should be free.
 - Senior volunteer program. Volunteers program for safe walks to school.
 - Youth activities and mentoring programs.
 - There are more programs for young children, but not enough for those 13+.
 - Aftercare after HeadStart. Kids get out of the program while parents are still at work and there is no transportation provided.
 - An apprenticeship program that keeps kids in their neighborhood and teaches them the skills to fix up houses there.
 - Mentoring programs for people getting their GED or doing other adult/continuing education programs. There are a lot of adult education and employment resources here but people often have trouble seeking out these resources or completing programs.
 - Transportation assistance – there are several options for transportation assistance but they all have some drawbacks (fees that may be prohibitive for lower-income seniors, limited service area, limited schedules).
 - Improved transportation between residential areas and major employers, including nights. Transit to non-traditional schools (ex: Lanier Tech evening classes).
3. What recent housing, community development, and/or economic development initiatives have been successful in Gainesville? What made them successful? Are there uses of HUD grant funds you think Gainesville should consider?
- The City already has a program building small (1,000 sq. ft.) craftsman-style homes. This is a good idea.
 - Tiny houses should be explored.
 - Creative, higher-density developments (ex: The Enclave). Incentives for housing density.
 - Walton Summit redevelopment.
 - Northwestern Cottages.
 - Redevelopment incentives in target areas. There are existing TADs and Opportunity Zones in the city.
 - Use of CDBG for utilities and infrastructure in redevelopment areas.
 - Athens Street – downpayment assistance, affordable housing development, housing rehab in unincorporated Hall County

- The City of Chicago has a book out with plans for whole communities of small homes that could be a model.
 - Partnership with a nonprofit development corporation to focus on affordable housing development in key neighborhoods (ex: Rome, GA).
 - Some people need help building their credit. Homebuyer classes occasionally sponsored by a councilmember have had some success, but maybe try offering them through churches, places people feel comfortable going.
 - Neighborhood sweeps by City's Code Enforcement Division.
 - The Fair Street Neighborhood Center was a good use of funds.
 - Senior Life Center redevelopment.
 - Parks, greenspace, Highlands to Islands trail network, Butler Park.
 - Possibility of developing a smaller, community-oriented market in areas that lack access to food.
 - United Way's game plan – *One Hall*
 - Partnership between different agencies because everyone has different funding sources. Need to look for opportunities to work together.
 - Tenant education and fair housing education.
4. What parts of Gainesville are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
- New Holland and Dawsonville Highway are growth areas with commercial development.
 - Westside is not a growth area in terms of commercial development.
 - Southeast part of the city and Highway 129 is anticipated to see growth and development.
5. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Race would impact housing options.
 - People may have different options from one another. It depends on the neighborhood.
 - Available housing choices are the same, but what is available to each person depends on money.
 - On the south side of the city (south of Jesse Jewell) landlords would be more picky about who they rent to than sellers would about who they sell to.
 - A single mom would have different options. Her landlord would likely set a higher rent amount and because of her childcare expenses, she could afford less than a comparable household without children.
 - Language barriers may impact housing options. People with limited English proficiency are less likely to report issues for several reasons (fear of retaliation, language barriers, immigration status, etc.).
 - Accessibility will impact options for people with physical and other disabilities; there are not many accessible properties here.
6. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?

- Housing discrimination may be happening but is subtle. Someone may not know why they were turned down for an apartment.
 - There is redlining in Gainesville. People went to banks with good ideas, but couldn't get loans because of who the ideas came from.
 - We have to face racism in this community – it can be solved if we talk about it.
 - Not aware of housing discrimination here.
7. Are people in the area segregated in where they live? What causes this segregation to occur?
- Yes, there is economic and cultural segregation.
 - Yes, there is segregation along Jesse Jewell Parkway and Highway 129 / E.E. Butler Parkway. Most Latino residents live south of Highway 129.
 - Twenty years ago when the Hispanic population started to grow, rents exploded and African Americans were forced out toward the edges of the city.
 - The Hispanic population is branching out. As they accumulate wealth, they will move into other neighborhoods. Native African American residents have lived here longer and can have very deep roots in a neighborhood that make it feel like home.
 - No, people live all over town.
 - People live where they can afford and where they feel comfortable.
8. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- Georgia Legal Services
 - Metro Fair Housing
 - HUD
 - Legacy Link
 - Maybe Legal Aid or the Housing Authority provide this education.
 - If someone had a fair housing issue, there are several agencies in the community that may be able to refer them to the correct organization.
 - Fair housing brochures are available.
 - There have been fair housing events, but education needs to be more widespread.
 - In addition to fair housing education, there is need for education about predatory lending and for-profit schools.
9. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
- Police and fire protection are evenly provided. Will need to keep up with growth in the city.
 - The “swiss cheese” city limits make it difficult for sidewalk continuity. Some areas don't have sidewalks, but it may just be because it's an unincorporated pocket within the city. Different levels of resources between city and county areas.
 - Public transportation improvements are needed, including possible partnerships with major employers.

- Walkability needs to be improved – crosswalks, sidewalks, ADA accessibility, safe crossings on Jesse Jewell.
- Public space in some neighborhoods could be improved.
- Infrastructure (water, sewer, stormwater) availability can be a barrier to development.
- Schools are well spread out and they are all considered pretty good.
- School choice policy allows students to attend any school as long as it is not full and bus transportation is available.
- Southeast Gainesville has less resources, particularly grocery stores. There have been unsuccessful efforts to attract a grocery store there.
- There is a perception based on historical data that resources are not equitably distributed, but in reality it is probably equal. City tries to touch on each neighborhood evenly, although not all improvements can be done at once.
- Community policing is helpful.

10. Is there anything we haven't discussed that you feel is important to our research?

- Hispanic residents will sometimes pool their resources and buy a home for someone in their community who has papers and a good job and then move that family out later and a newer family into the house. Some Indian and Asian families do this too.
- Black residents' cultural roots are not as deep. They often have to rediscover and reclaim their heritage – food, art, clothing, etc. Hispanic residents are more likely to remain connected to their culture.
- Has integration actually worked? Kids' classrooms are diverse and kids of all colors are graduating, but that diversity isn't present among those governing.

Stakeholder Interviews

1. What types of housing needs are there in Gainesville? Are there parts of the city where the need is greater than others?
 - There are affordable apartments in the \$900-\$1,000 range that may be affordable to police officers and teachers, but anything affordable to minimum wage workers or people transitioning out of homelessness is likely in very poor condition, almost not livable.
 - Lack of available housing has driven rent increases of about \$100/month every year. In the \$600-\$700/month range, housing conditions are terrible and landlords won't correct them because an unhappy tenant has nowhere else to go.
 - Affordable housing at multiple strata is needed – both public housing but also modest housing provided by the private market at a price affordable to Brenau faculty and public safety workers.
 - There are no longer any \$500/month rentals in the private market. The Housing Authority is a great partner, but their waiting list is long and closed. Walton Summit is beautiful but not an option for people transitioning from homelessness.
 - There can be pushback/NIMBYism from some neighborhoods about multifamily trying to develop there, especially in the county.
 - Gainesville Housing Authority's longest waiting list is for 1-bedroom units.

- Families can get housing vouchers but cannot find a place to use them. Rentals may be expensive even with the voucher or landlord may not accept vouchers.
 - African American community reports problems using housing vouchers. The market is tight so landlords lack incentive to work with voucher holders or bureaucratic programs when they can easily rent the same unit to someone else without a voucher.
 - Affordable workforce housing that is within city limits in a walkable area with good access to resources.
 - Workforce housing that is in the city and close to jobs.
 - Pre- and post-purchase counseling and budgeting classes to help homeowners be successful.
 - Many Spanish-speakers have the income to qualify for a mortgage but don't have access to the process because it's not in their language.
 - Housing with low/reduced maintenance costs is helpful for seniors, first time homebuyers.
 - Lots of people come to Gainesville for employment, but wages don't cover housing costs.
 - Even people with industrial jobs who are paid relatively well have problems finding housing. Houses that are available are old, in poor condition, or in trailer parks.
 - Can be difficult to find people who want to invest in older properties, especially if they are in a historic district where rehab may be more costly.
 - There is a lack of available affordable housing for local workers from the chicken plants.
 - Large immigrant population working in poultry plants and many live in hotels because deposits are hard to accumulate.
 - Eviction history is "like a scarlet letter" that can make it difficult to ever find decent housing.
 - Legal services can help tenants facing eviction negotiate better outcomes.
 - Housing is needed for low/mod income seniors.
 - Community and group housing for seniors with shared kitchen facilities should be considered.
 - Housing that is accessible, affordable, and near transit is crucial for people with disabilities. Long wait list (2 years) for affordable accessible units.
 - There is a need for transitional housing for inmates returning to the community with integrated supports to help them re-enter the workforce.
 - A coordinated shelter program with programs or tracks for both men and women is needed.
 - Inclusionary zoning would help create more affordable housing; the County's partnership could be important in implementation.
 - Housing developments should include a mix of price points, sizes, and unit types.
 - Expanded infrastructure to vacant lots could get developers interested and help increase density/reduce housing costs.
 - Price control is needed, not necessarily more subsidies.
2. What do you believe are Gainesville's greatest community, economic development, or public service needs?
- Transportation is a big need. Public transportation is very limited, usually only one bus per hour and doesn't serve schools. Must use taxis.
 - Public transportation is poor, so if you have to take taxi or walk a long distance to a park, you are unlikely to use it often. They need to be close to the residents who will use them.

- Transportation is a huge issue. There is no weekend service and weekday bus service ends at 6:00 p.m. The cost is reasonable, but the service doesn't meet needs.
 - Need for better transit connections between residential areas and major employers, especially in Hall County.
 - If transportation were improved, some existing services would be used more frequently.
 - Sidewalks are needed along Atlanta Highway – this is where the work is and also where the Hispanic community gathers.
 - Grocery store in Newtown and Downtown neighborhoods.
 - Need more parks and playgrounds off Atlanta Highway; amenities for older kids like basketball courts. Large community center with recreation activities, sports facilities.
 - Youth programming especially in low-income communities.
 - Students and families who do not speak English are a challenge for the local school systems.
 - Affordable, quality daycare.
 - Childcare is a big need. A single mom can lose her job within a week just because her child gets sick and can't go to school. There need to be 24-hour options for those working odd shifts and hours.
 - The City could improve on senior services, especially support for homebound seniors.
 - The city has too many low-paying jobs: chicken processing, factories. Need job training for employment opportunities that pay a living wage. More information/publicity about available workforce development options.
 - There is no local gym or fitness facility that is free to use.
 - A second health center in South Hall would be helpful. Not that the existing center is overcrowded, but it's inaccessible – people with transportation challenges have a difficult time getting there.
3. What recent housing, community development, and/or economic development initiatives have been successful in Gainesville? What made them successful? Are there uses of HUD grant funds you think Gainesville should consider?
- The United Way's One Hall Initiative has successfully pulled together stakeholders around a set of core principles and goals for what the community wants to be. The ongoing effort should continue to be supported by the wider community.
 - Chamber is providing internships, job training. Need to get the information out.
 - Lanier Tech's partnership on an adult literacy program has been successful.
 - The City's code enforcement program has done a good job of cleaning up blight. It should continue to be supported.
 - Encourage more landlords to accept Section 8. Consider possible additional incentives or support that could be provided to landlords who participate.
 - More concentrated community development investment would make a bigger impact.
 - More CDBG funding should be devoted to construction of new housing. The annual amount Gainesville receives may not seem like much, but could build a lot of tiny homes over five years.
 - Possibility of rental housing redevelopment; ex: group of investors who purchased shuttered rental housing and rehabilitated it, then reopened as non-subsidized affordable housing.

- Wish the City would devote more funding to the construction of affordable housing.
 - The City/County Land Bank has been a successful collaboration leading to redevelopment activity on Athens Street.
 - Gainesville is a Georgia Initiative for Community Housing (GICH) community, which has been helpful for resource coordination and development.
 - Continue to seek additional grant funds and support for housing (ex: CHIP, HOME funds)
 - Walton Summit is a great example of what affordable housing can be – need more projects like it.
 - Cottage housing being developed by Frank Norton is a good model. Other possible creative models for smaller units. Locations should be walkable and near grocery.
 - Possibility of building communities of tiny homes as employee housing near the chicken plants.
 - Build a park or playground.
 - Neighborhood/community grocer.
 - Stormwater, street, and sidewalk improvements should be considered in low-income neighborhoods. You have to have the basics before prioritizing anything else.
 - The problem in Gainesville isn't food. Everyone wants food drives and food banks, but the homeless need medical care, job training, and housing.
 - Recognize and celebrate Gainesville's neighborhoods.
4. What parts of Gainesville and Hall County are generally seen as areas of opportunity? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?
- Opportunity is good within the city limits except for transportation. The parents have school choice. Jobs are available but pay is not always adequate.
 - Good options throughout the city. Where someone lives depends on what they're looking for and costs.
 - Gainesville is an attractive place to live but there are areas with wealthy residents and areas with higher poverty.
 - The barrier to areas with good opportunity is transportation. Even though its available in Gainesville, service is so poor, it's not really an asset. And you can't use it to get to work anywhere outside the city.
 - North and west parts of the city are generally more attractive to people, where newer development has been. North side of the city is more affluent.
 - Around Enota School, because there is a bus line, grocery store, and services.
 - Live/work developments have been discussed for Midtown, but they're not there yet and won't be affordable when they do come online. Would be great if there was better/safer pedestrian connectivity to Midtown across Jesse Jewell.
 - Hottest part of Gainesville is Downtown and surround areas because people like the square and renovated older homes. Cost is a barrier to living there.
 - Midtown and Ivy Terrace are close to downtown Gainesville with good access to parks and trails.
 - The lake – people like the location; it is desirable, but not really convenient to anything.

- There are opportunities in the southern and eastern parts of Gainesville. It will be important that redevelopment there is compatible with existing neighborhoods.
 - New Holland area.
 - North part of the county has good jobs and school options but is not diverse.
 - Immediately outside Gainesville city limits is affluent. North County schools are the best and crime rates are low, but the area is further out, so transportation is more difficult.
 - Toward Flowery Branch and Oakwood are areas with good access to industrial jobs and new housing development, but there is no transit available. NIMBYism in Flowery Branch related to rental housing, less expensive developments.
 - Oakwood is more mixed than Gainesville in terms of racial and ethnic composition because Gainesville has public housing, which concentrates people of color.
 - An area of opportunity is anywhere there's an affordable apartment available.
5. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?
- No, people do not have the same housing options because of differences in the supports available to them. Being able to count on a network of neighbors plays a big role in housing choice.
 - A "hard no" as to whether residents have equal housing opportunities. It's not uncommon to see newspaper ads that say "no children". Color is less a factor in discrimination than "Spanish-speaking" and if a resident does not have legal status, there's no way they're going to HUD to file a complaint.
 - Yes, people may be treated differently based on protected class at some ends of the market. More of an issue with landlords of small rental buildings than in larger, professionally-managed properties.
 - Race and ethnicity may play a factor.
 - There are a lot of areas in Gainesville such as North Hall and Green Street where people of color are not prohibited from living but are not invited to live there either or may not feel welcome.
 - It's possible that some protected class characteristics could influence housing options. Neighborhoods that don't want rental housing could influence housing choice.
 - Not aware of blatant housing discrimination, although there was a case several years ago.
 - It may exist. Not seen personally. Don't think it happens with housing authority, possibly in private sector.
 - People have the same range of choices – have not seen any differences.
 - Any disparities in choice would be due to income. Fair housing is not a problem – it's all economics.
 - People may have different options because they belong to different groups and choose to live in different areas.
 - Black families have been displaced from public housing and those residents are now mostly Hispanic.

- For people with disabilities, there are definitely not the same choices. The barrier is physical accessibility of units. The supply is too low and wait lists are long.
6. Are people in the area segregated in where they live? What causes this segregation to occur?
- Southeast Gainesville is primarily Black, the Southwest is low-income white, the North is upper income white and some affluent Black families. Most of the city's rental units are occupied by Hispanic families and they are scattered all over the city.
 - Yes, segregated economically. Apartment complexes more racially balanced but poor neighborhoods are segregated. No mobile homes in city limits, only in the county. There is an African-American part and a mostly white part.
 - Yes, there are parts of the city with more Black, Latino, white population than others. School system is more diverse.
 - City is segregated by race and economics and has been historically as the city developed.
 - Segregation occurs but is based on economics, not based on race.
 - Yes, there is segregation and it is reinforced due to generational poverty.
 - Segregation persists because of housing costs. New homes at a \$350,000 price point attracts a certain demographic and excludes others.
 - There is segregation but not as much as in some other places.
 - Building housing that is all similar price/rent in one location reinforces economic segregation. Mixed income communities are needed.
 - There is some tension between the white, Black, and Hispanic communities within the area.
7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- The average Gainesville resident wouldn't know where to go to for fair housing assistance. Education efforts through local organizations, churches, etc. would be one way to get information out. Education efforts should target most vulnerable communities.
 - Don't know of anyone who does this. Maybe Georgia Legal Aid.
 - Not sure. No one comes to mind.
 - Metro Fair Housing is a referral point for fair housing issues.
 - Metro Fair Housing used to have an office in Gainesville, but the City no longer funds them so it closed about 10 years ago.
 - Georgia Legal Services may do some work in this area, but they have a small staff and can't do much.
 - Georgia Legal Services is fabulous and has two dedicated housing workers and informal partnerships within the community to help with eviction prevention.
 - Gainesville Housing Authority provides some education; the Community Service Center used to do some.
 - Education around fair housing isn't available in Gainesville, but would be far-reaching. There is a fear among tenants, especially those living in single-family homes, of reporting a problem because the landlord will know exactly who to retaliate against.

- Difficult to navigate. School social workers work with nonprofits on housing. Needs to be someone to help finding housing and following up once housing is found, budgeting, advocacy.
8. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods?
- Need for more parks and recreation opportunities in certain areas. Within city limits, more options in close and fewer farther away. Areas where more sidewalks are needed, even some routes to schools. More activities needed in neighborhoods.
 - The pool on Green Street was just renovated while people in the poor part of town don't even have a basketball court. Parks are definitely disproportionate but City seems to be working on that.
 - Some disinvestment and blight in the poorer parts of the city. Could probably use more attention.
 - Work in the Fair Street neighborhood has been good.
 - Opportunity factors and amenities in Gainesville are based not on what the community needs, but on what a white person thinks the needs may be. When 40% of the community is Hispanic, there needs to be more effort to include and reach out to Spanish-speakers.
 - The quality of the City's upkeep in minority neighborhoods is poorer. "The only thing we get more of is police."
 - Some areas (Lula, East Hall, Gainesville's outskirts) get less than their share.
 - Nothing will be equitable as long as the school system's budget is based on property taxes.
 - Access to public resources is generally good; schools in Gainesville seem great.
 - The City does a good job with resources; Hall County is very different, and poorer.
 - Police and fire departments do a great job, are very caring and establish strong community relationships.
 - Resources are evenly distributed and facilities are evenly upgraded. No one should feel left out.
 - It is hard to get equitable shares of investment anywhere, but Gainesville does as good a job as anyplace else.
 - Transit could be more
 - efficient, but this is an issue citywide.
9. Is there anything we haven't discussed that you feel is important to our research?
- Someone may have an eviction but if they're employed, having an advocate/someone to help them get into housing would be very helpful, assistance with lump sum of deposit, etc. People living in hotels are less visible, difficult to call attention to the problem.
 - The City's anti-panhandling ordinance criminalizes homelessness, but the shelters are all full and the housing authority's waiting list is closed. How are the homeless expected to get by?
 - Prisoner re-entry is also a housing issue. They tried to hold a landlord education event related to this and no one came.
 - A "housing first" model is important. Getting people into housing helps correct or avoid a lot of other issues.

- In Gainesville, you either live “on the lake” or in substandard housing. It’s a case of haves and have-nots with a small middle class.
- Gainesville has a good section of town, but not a bad section – there are little pockets of blight everywhere.
- There is a gap between the African American and Latino community caused by certain misunderstandings and cultural differences. “Minorities” are often all lumped together, but their needs are actually very different.
- Real estate practices such as how to build credit, close a home loan, and seek out programs and classes to help, are unfamiliar to many Hispanic residents.
- Simply translating written material into Spanish is not always the most culturally appropriate means of communicating with the Latino population. That said, the City’s website should exist in a Spanish version.
- The City should be more expressive of its commitment to diversity. A message along the lines of: “This is us. Our community is 40% Latino and we’re proud they’re here. Here is how Latino’s contribute to Gainesville...” would go a long way toward setting the tone.
- More activities that attract different racial and ethnic groups to socialize and enjoy cultural activities together would be beneficial (ex: music events/festivals, gastrointentional weekend)
- It may be beneficial to retain industry in Gainesville, but push it out of the center of the city; it should be at the edge of the city and adjacent to affordable housing so the city’s core can grow and redevelop.
- Economic development in Gainesville will dry up if there is no housing for the workforce. Need for workforce housing was key outcome from the recent economic development strategy. There needs to be more education about the importance of affordable housing.
- Gainesville’s building codes are more restrictive than elsewhere in North Georgia and all the features they require add to the eventual rent that will be charged to tenants.
- The City should waive water/sewer tap fees for affordable housing. These impact fees can run into the thousands.
- The City should look for ways to participate with developers to encourage mix of housing prices, unit types, unit sizes.
- Gainesville’s school board does not want any more multifamily housing and has written letters opposing such housing developments to City officials.
- Hall County doesn’t want to shoulder any of the challenges Gainesville faces as a urban area. The County isn’t interested in extending sewer because it will encourage development. The County’s lack of accommodation for growth is intentional.
- The younger generation has a different mindset about housing and the market will have to adapt. Many see a house as a home base, a place to sleep at night, but “home” is more likely to be a community space where social interactions occur. Smaller houses with fewer amenities may better suit these individuals.

Community Survey

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

Participant Demographics

- Of the 38 people who participated in the survey, 32 took the survey in English and 6 completed it in Spanish. Eight respondents regularly speak Spanish in their homes.
- Survey participants live throughout Gainesville, including in Downtown, Midtown, Newtown, the Bradford-Ridgewood area, the Fair Street area, and other areas in the city. Nine participants live outside Gainesville city limits.
- Respondents' ages are relatively evenly distributed. About 40% are between ages 25 and 44 and the remaining 60% of participants are roughly evenly split between the 45 to 61 and 62 and over age groups.
- About one-half of survey takers (47%) have incomes under \$50,000 and the other one-half (53%) have incomes above \$50,000. Five participants (14%) have very low incomes under \$25,000 and ten (28%) have incomes over \$100,000.
- Almost one-half of survey participants are white (49%) and nearly one-third are African American or Black (32%). Latino respondents make up 16% of the total.
- Six survey respondents (16%) have or live with someone who has a disability.
- Most participants (58%) own their homes, 39% rent, and 3% (one respondent) live with a relative. Two respondents live in public housing or use a Section 8 voucher.

Housing and Community Resources in Gainesville

- When asked to identify housing needs in Gainesville, 74% of respondents (26 people) said that there is a high need for grants to improve affordable rental housing; another 17% (6 people) identified it as a moderate need. Other popular responses include construction of new affordable housing, housing that accepts Section 8 vouchers, and family housing, all of which were identified as a high need by at least 60% of survey takers and as a moderate need by at about 20-30%. Senior housing and energy efficiency improvements were also frequently identified as needs.
- When asked about needs related to homelessness, permanent housing and access to emergency shelter were top selections, each identified as a high need by about 70% of respondents (or 24-26 people). Each of the other selections – homelessness prevention, outreach to homeless people, and transitional/supportive housing programs – were also identified as a high need by at least half of survey takers, indicating that resources to address homeless are a key need in Gainesville.
- Thinking about the availability of community resources in Gainesville, more than two-thirds of respondents (or more than 22 people) report that fire and police protection, garbage collection, and schools are evenly provided throughout the city. Responses regarding bus service, banking and lending, and parks and trails were more evenly divided. Three resources were generally thought of as not being equally provided throughout Gainesville: grocery stores and other shopping (identified

as unequally provided by 77% of participants), roads and sidewalks (identified by 71%), and property maintenance (identified by 63%).

Fair Housing in Gainesville

- Relatively large shares of survey participants report knowing or somewhat knowing their fair housing rights (46% and 34%, respectively). However, about one-fifth of people do not know their fair housing rights (20%) and three times that number (60%) would not know where to file a fair housing discrimination complaint.
- Five participants experienced housing discrimination while living in Gainesville, two by a city or county staff person, one by a mortgage lender, one by a landlord or property manager, and one by a nonprofit housing development agency. Bases for discrimination included race, ethnicity, and gender.
- Of the five respondents who experienced discrimination, none filed a report of it. Reasons for not reporting include not realizing it was a violation, not knowing what good it would do, not knowing where to file, fear of retaliation, and inaccessibility of the filing process due to a disability.
- Survey participants were asked whether they think housing discrimination is an issue in Gainesville. About 38% answered yes and 28% said it was somewhat of an issue. About 13% said now, and the remaining 22% didn't know.
- Asked to select any factors that are barriers to fair housing in Gainesville, respondents most commonly identified the following impediments:
 - Not enough affordable housing for families (selected by 77% of respondents);
 - Not enough affordable housing for individuals (selected by 71%);
 - Not enough affordable housing for seniors (selected by 71%);
 - Displacement of residents due to rising housing costs (selected by 68%); and
 - Neighborhoods that need revitalization and new investment (selected by 65%).

CHAPTER 3.

SOCIOECONOMIC PROFILE

DEMOGRAPHIC PROFILE

According to U.S. Census data, the total population of the city of Gainesville is 33,812, which accounts for 18.8% of the population of Hall County (179,684). From 1990 to 2010, the population of Gainesville increased significantly (57.8%), while Hall County increased at an even greater rate, nearly doubling (88.3%).

Race/Ethnicity

The population of the city of Gainesville is racially and ethnically diverse. No single racial/ethnic group has a majority share of the population. White non-Hispanic residents are the largest group, making up 46.1% of the population. Hispanic residents are the next largest group, with 38.6% of the population, followed by African-Americans (11.6%), Asians (2.2%), and people of two or more races (1.2%).

From 1990 to 2010, the city's population increased rapidly, but at the same time the white, non-Hispanic population fell from 16,603 to 15,572. Though the absolute decrease is modest, because all other groups' populations grew during this time, the white non-Hispanic share of the population fell from 77.2% to 46.1%. The other most noticeable trend is the rise in the Hispanic population from 1,677 in 1990 (7.8%) to 13,054 in 2010 (38.6%). The African-American population increased, but because Hispanic population increased much more rapidly, the African-American share of the population decreased from 13.8% to 12.3%.

National Origin

Foreign-born residents of the city of Gainesville make up a significant share (22.3%) of the total population. The foreign-born population increased greatly from 1990 to 2000 and then more slowly between 2000 and 2010. The most common origins of the foreign-born population are from Mexico (18.2%) and El Salvador (3.2%). Other common countries of origin include Vietnam (1.7%) and Honduras (1.4%). Residents from Colombia, India, Germany, Cuba, and Nicaragua each account for less than 1% of the population. Within Hall County, the countries of origin are almost identical.

LEP

Population dynamics for people with limited English proficiency (LEP) often resemble those of foreign-born residents in a community. This is generally true for the city of Gainesville, but there are some slight variations worth exploring. In 1990, the LEP population (5.5%) was slightly less than the foreign-born population. In 2000, both the LEP and foreign-born population rose substantially but the foreign-born population increased at a greater rate. However, in 2010, while the rate of increase of the foreign-born population had slowed and its share of the total population decreased, the LEP population increased

more rapidly and its share of the population increased. By 2010 the LEP population and foreign-born populations were nearly identical again.

The breakdown of languages spoken by the LEP population is consistent with the national origins of foreign-born residents. Spanish is by far the most common language (23.2%) and Vietnamese the next most common (1.5%). Other languages are spoken by less than 0.5% of the population.

Disability

According to the data provided by the American Community Survey, 10.7% of the total population in the city of Gainesville reported having a disability. Ambulatory disabilities are the most common type in the city and county, affecting 6% of each. Cognitive disabilities are the next most common in both areas, followed by independent living; hearing, self-care, and vision difficulties are the three least common disabilities in the city and county. Disabilities that require extensive assistance such as difficulties with independent living or self-care make up 36.4% and 21.3% of the disabled population, respectively.

Age

The population of Gainesville is generally young. The largest segment of the population (60.4%) is between the ages of 18 and 64. The population under the age of 18 (28.7%) is significantly larger than the population that is 65 and over (11.0%). Between 1990 and 2010, the younger segment of the population increased in both absolute numbers and as a share of the population, while the middle and older segments of the population increased in terms of absolute numbers but decreased as a share of the population. These same trends are evident in Hall County.

Sex

The gender distribution of the city of Gainesville is proportional between males and females. The female population is the slight majority and comprises 50.9% of the population. Hall County is even closer to proportional with females a slim 50.1% majority.

Family Type

The number of families with children decreased in Gainesville from 1990 to 2000 in both absolute numbers and as a percentage of total families (from 45% to 44.6%). However, from 2000 to 2010, the number of families with children increased significantly in both absolute numbers and as a percentage of total families (from 44.6% to 51.1%). Again, these patterns are very similar in Hall County.

TABLE 1 – DEMOGRAPHIC OVERVIEW OF THE CITY OF GAINESVILLE AND HALL COUNTY

Demographic Indicator	City of Gainesville		Hall County			
	#	%	#	%		
Race/Ethnicity						
Non-Hispanic						
White	15,572	46.1%	114,300	63.6%		
Black	3,922	11.6%	12,757	7.1%		
Asian or Pacific Islander	750	2.2%	3,238	1.8%		
Native American	59	0.2%	372	0.2%		
Two or More Races	409	1.2%	1,862	1.0%		
Other	47	0.1%	249	0.1%		
Hispanic	13,054	38.6%	46,906	26.1%		
National Origin						
#1 country of origin	Mexico	5,595	18.2%	Mexico	17,572	10.4%
#2 country of origin	El Salvador	990	3.2%	El Salvador	2,337	1.4%
#3 country of origin	Vietnam	521	1.7%	Vietnam	1,205	0.7%
#4 country of origin	Honduras	414	1.4%	Honduras	1,072	0.6%
#5 country of origin	Guatemala	288	1.0%	Guatemala	930	0.6%
#6 country of origin	Colombia	96	0.3%	Colombia	859	0.5%
#7 country of origin	India	96	0.3%	India	401	0.2%
#8 country of origin	Germany	81	0.3%	Germany	325	0.2%
#9 country of origin	Cuba	80	0.3%	Canada	287	0.2%
#10 country of origin	Nicaragua	73	0.2%	Philippines	276	0.2%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	7,121	23.2%	Spanish	20,884	12.4%
#2 LEP Language	Vietnamese	460	1.5%	Vietnamese	834	0.5%
#3 LEP Language	German	58	0.2%	German	155	0.1%

TABLE 1 – DEMOGRAPHIC OVERVIEW OF THE CITY OF GAINESVILLE AND HALL COUNTY (CONTINUED)

Demographic Indicator	City of Gainesville		Hall County			
	#	%	#	%		
Limited English Proficiency (LEP) Language (continued)						
#4 LEP Language	Chinese	46	0.2%	Chinese	123	0.1%
#5 LEP Language	African	24	0.1%	Gujarati	69	<0.1%
Disability Type						
Hearing difficulty		818	2.7%		4,983	3.0%
Vision difficulty		867	2.9%		3,236	1.9%
Cognitive difficulty		1,441	4.8%		7,286	4.4%
Ambulatory difficulty		1,799	6.0%		10,742	6.5%
Self-care difficulty		784	2.6%		3,756	2.3%
Independent living difficulty		1,238	4.1%		6,890	4.1%
Sex						
Male		16,612	49.1%		89,601	49.9%
Female		17,200	50.9%		90,083	50.1%
Age						
Under 18		9,700	28.7%		50,166	27.9%
18-64		20,404	60.4%		109,508	60.9%
65+		3,708	11.0%		20,010	11.1%
Family Type						
Families with children		3,898	51.1%		21,650	47.8%

Note: All % represent a share of the total population within the jurisdiction, except family type, which is out of total families. The most populous places of birth and languages at the city and county levels may not be the same, and are thus labeled separately.

Data Sources: Decennial Census; ACS

TABLE 2 – DEMOGRAPHIC TRENDS FOR THE CITY OF GAINESVILLE AND HALL COUNTY

Demographic Indicator	City of Gainesville							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	16,603	77.2%	16,125	55.3%	15,572	46.1%	15,572	46.1%
Black, Non-Hispanic	2,970	13.8%	3,111	10.7%	4,159	12.3%	3,922	11.6%
Hispanic	1,677	7.8%	9,103	31.2%	13,054	38.6%	13,054	38.6%
Asian or Pacific Islander, Non-Hispanic	207	1.0%	660	2.3%	829	2.5%	750	2.2%
Native American, Non-Hispanic	20	0.1%	107	0.4%	145	0.4%	59	0.2%
National Origin								
Foreign-born	1,570	7.3%	7,761	26.6%	8,076	23.9%	7,535	22.3%
LEP								
Limited English proficiency	1,170	5.5%	6,096	20.9%	7,486	22.1%	6,772	20.0%
Sex								
Male	10,182	47.5%	14,773	50.7%	16,612	49.1%	16,612	49.1%
Female	11,250	52.5%	14,387	49.3%	17,200	50.9%	17,200	50.9%
Age								
Under 18	4,982	23.3%	7,565	25.9%	9,700	28.7%	9,700	28.7%
18-64	13,451	62.8%	18,142	62.2%	20,404	60.4%	20,404	60.4%
65+	2,999	14.0%	3,454	11.8%	3,708	11.0%	3,708	11.0%
Family Type								
Families with children	2,584	45.0%	1,892	44.6%	3,898	51.1%	3,898	51.1%

TABLE 2 – DEMOGRAPHIC TRENDS FOR THE CITY OF GAINESVILLE AND HALL COUNTY (CONTINUED)

Demographic Indicator	Hall County							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Race/Ethnicity								
White, Non-Hispanic	81,859	85.8%	98,955	71.0%	114,300	63.6%	114,300	63.6%
Black, Non-Hispanic	8,155	8.5%	10,174	7.3%	13,653	7.6%	12,757	7.1%
Hispanic	4,541	4.8%	27,229	19.5%	46,906	26.1%	46,906	26.1%
Asian or Pacific Islander, Non-Hispanic	592	0.6%	2,020	1.5%	3,616	2.0%	3,238	1.8%
Native American, Non-Hispanic	160	0.2%	673	0.5%	906	0.5%	372	0.2%
National Origin								
Foreign-born	4,387	4.6%	22,504	16.2%	28,335	15.8%	28,151	15.7%
LEP								
Limited English proficiency	3,458	3.6%	17,599	12.6%	24,379	13.6%	22,442	12.5%
Sex								
Male	46,894	49.1%	70,568	50.7%	89,601	49.9%	89,601	49.9%
Female	48,554	50.9%	68,740	49.3%	90,083	50.1%	90,083	50.1%
Age								
Under 18	24,520	25.7%	38,579	27.7%	50,166	27.9%	50,166	27.9%
18-64	60,706	63.6%	87,661	62.9%	109,508	60.9%	109,508	60.9%
65+	10,221	10.7%	13,068	9.4%	20,010	11.1%	20,010	11.1%
Family Type								
Families with children	12,862	48.2%	9,398	47.8%	21,650	47.8%	21,650	47.8%

Note: All % represent a share of the total population within the jurisdiction for that year, except family type, which is out of total families.

Data Sources: Decennial Census; ACS

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded throughout the United States by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

There is one RECAP tract in Gainesville (Tract 11.01), as shown on the map that follows. This tract, which includes Downtown, Midtown, and parts of the Westside neighborhood, covers areas in both Gainesville and unincorporated Hall County. It is roughly bounded by These tracts are roughly bounded by E.E. Butler Parkway to the north, SW Industrial Boulevard and Atlanta Highway to the east, Hilton Drive to the south, and SW Jesse Jewell Parkway on the west.

Table 3 provides an overview of demographic characteristics in this tract, showing that the majority of its population is Latino (84.1%). More than one-third of residents (35.4%) are Mexican immigrants; residents from Guatemala, El Salvador, and Honduras are also common.

Housing needs related to affordability and overcrowding are also common in this census tract. About 71% of households here spend more than 30% of their income on housing, are overcrowded, or lack complete kitchens or plumbing in their homes.

While housing needs are elevated in this area, there are many community assets in these neighborhoods, including Downtown, Myrtle Street Park, and the Midtown Greenway. Both the Midtown and Westside neighborhoods have Tax Allocation Districts intended to help spur redevelopment.

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

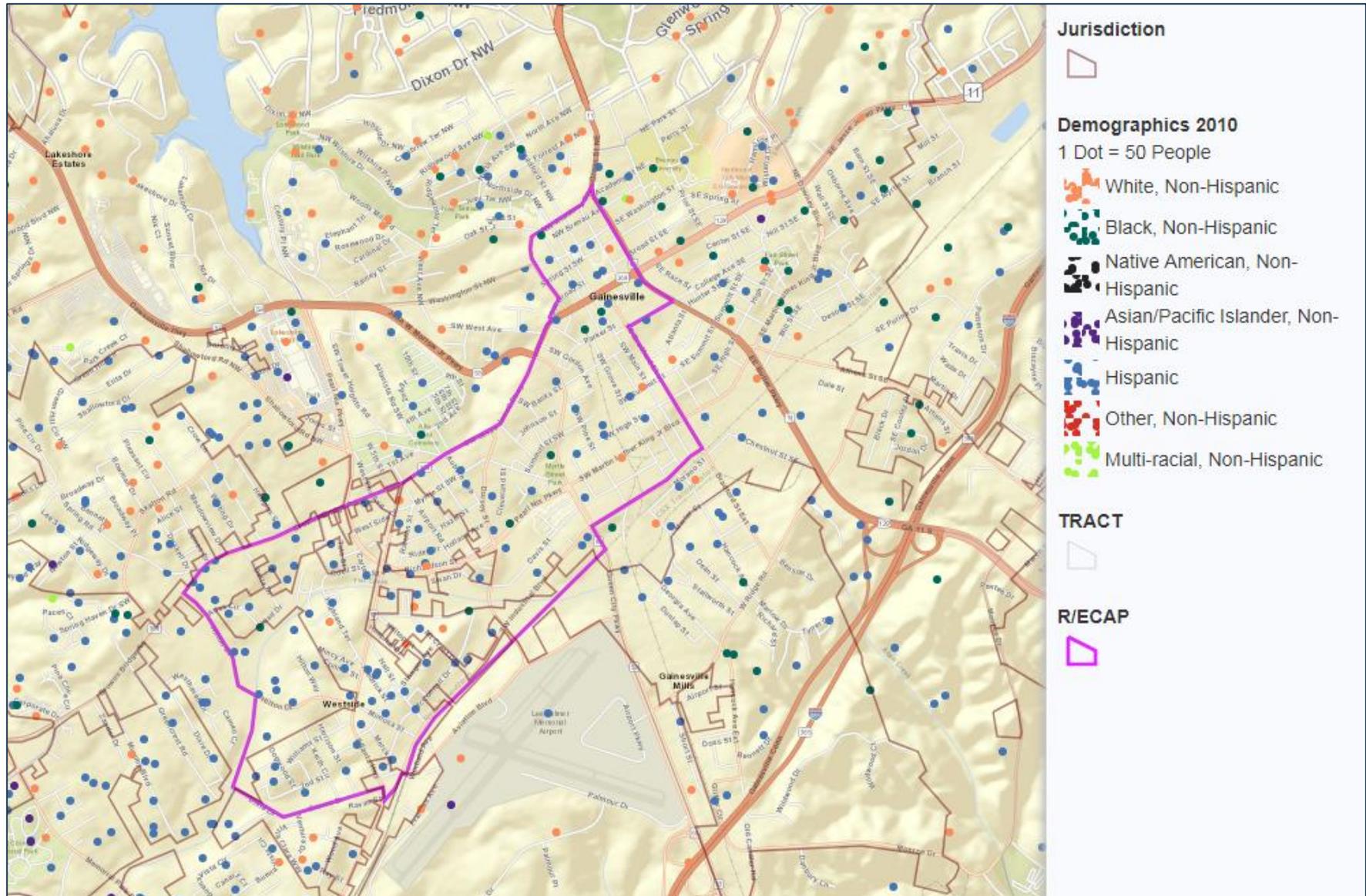
⁵ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

TABLE 3. RECAP DEMOGRAPHIC PROFILE

Demographic Indicator	Gainesville RECAP Census Tract		Hall County RECAP Census Tract			
	#	%	#	%		
Race/Ethnicity						
Total Population in RECAPs	2,404	-	5,249	-		
White, Non-Hispanic	202	8.4%	441	8.4%		
Black, Non-Hispanic	144	6.0%	315	6.0%		
Hispanic	2,022	84.1%	4,415	84.1%		
Asian or Pacific Islander, Non-Hispanic	17	0.7%	37	0.7%		
Native American, Non-Hispanic	3	0.1%	6	0.1%		
Other, Non-Hispanic	4	0.2%	9	0.2%		
National Origin						
Total Population in RECAPs	2,404	-	5,249	-		
#1 country of origin	Mexico	850	35.4%	Mexico	1,856	35.4%
#2 country of origin	Guatemala	268	11.1%	Guatemala	585	11.1%
#3 country of origin	El Salvador	116	4.8%	El Salvador	253	4.8%
#4 country of origin	Honduras	80	3.3%	Honduras	174	3.3%
#5 country of origin	Nicaragua	6	0.3%	Nicaragua	13	0.3%
Family Type						
Total Families in RECAPs	426	-	930	-		
Families with Children	295	69.3%	644	69.3%		

Data Sources: Decennial Census; ACS

FIGURE 1 – RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (RECAP) IN GAINESVILLE, 2010



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

CHAPTER 4.

SEGREGATION & INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

As shown in Figure 2, the most densely populated neighborhoods in the city of Gainesville are located in the southwest region of the city. However, segments of densely populated neighborhoods are located in unincorporated areas outside city limits. There are strong visual indications of segregation by race and ethnicity according to the spatial distribution data shown in Figure 2. The racial composition of densely populated areas in southwest Gainesville are predominantly Hispanic. The Black population is more integrated throughout the city compared to the Hispanic population, however, there are visible concentrations in neighborhoods along Jesse Jewell Parkway. The majority of the population residing in neighborhoods north of John W. Morrow Junior Parkway and west of Park Hill Drive is comprised of white residents. The population in outlying sections of the city east of Interstate 985 are predominantly Hispanic and noticeably less dense.

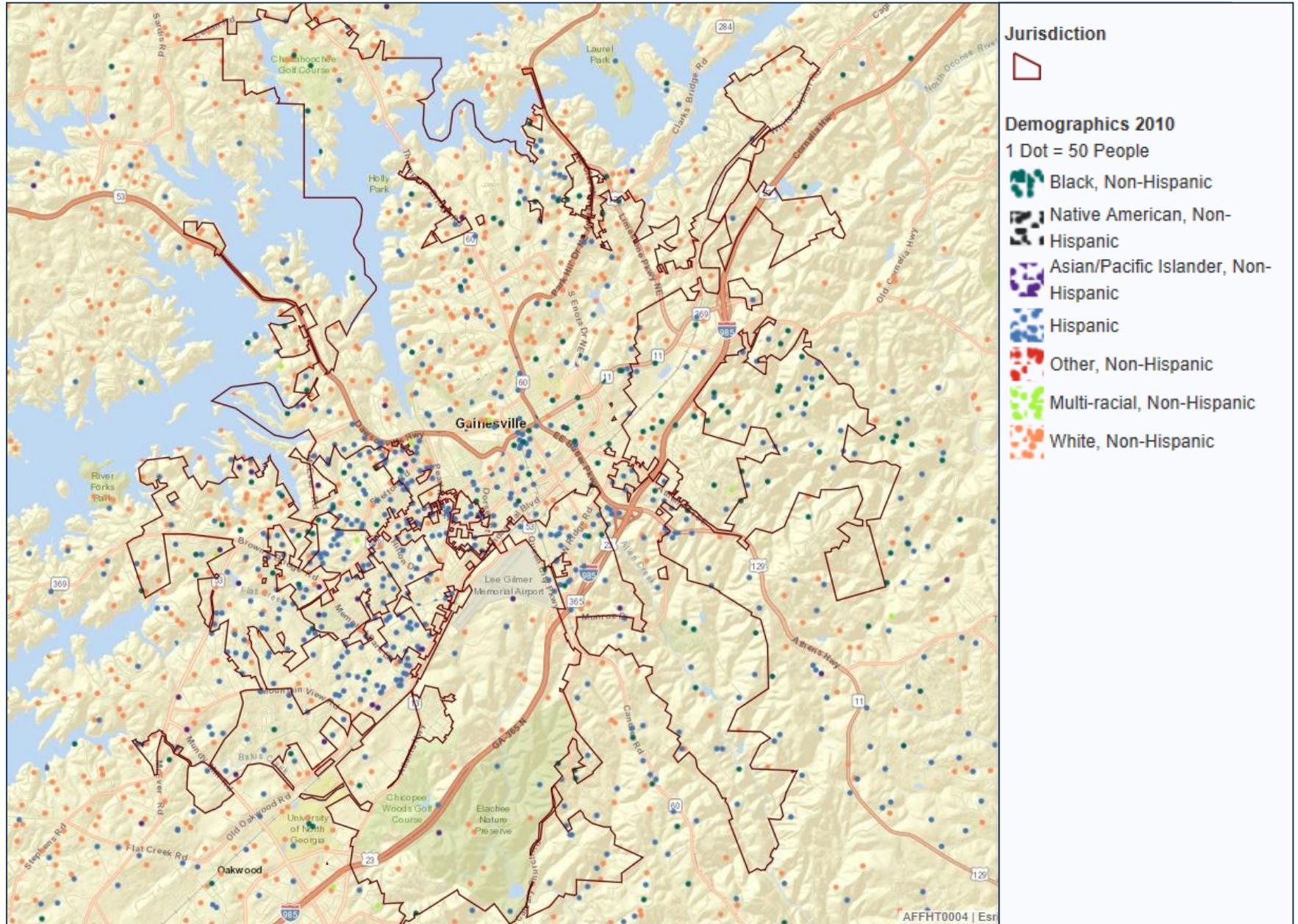
Drastic shifts in racial and ethnic composition have occurred since 1990. Population distribution patterns in 1990 indicate a much smaller Hispanic population and stark residential segregation between white and Black populations. Figure 3 shows the explosive growth and integration of the Hispanic population throughout most parts of the city in 2000. The significant influx of Hispanic residents between 1990 and 2010 coincided with increased racial and ethnic integration throughout the city, however, Figure 2 shows an increasingly homogeneous concentration of Hispanic residents in the southwest region of the city.

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Population distribution patterns in Hall County show a similar racial and ethnic composition to that of the city of Gainesville. The majority of the county's Hispanic population reside south of Lake Lanier with heavy concentrations present in the city and neighborhoods southeast of the city. Spatial distribution patterns in Figure 5 also indicate the majority of the Black residents in Hall County reside either within or in close proximity to the city of Gainesville. Conversely, neighborhoods north of Lake Lanier are less densely populated and predominantly white.

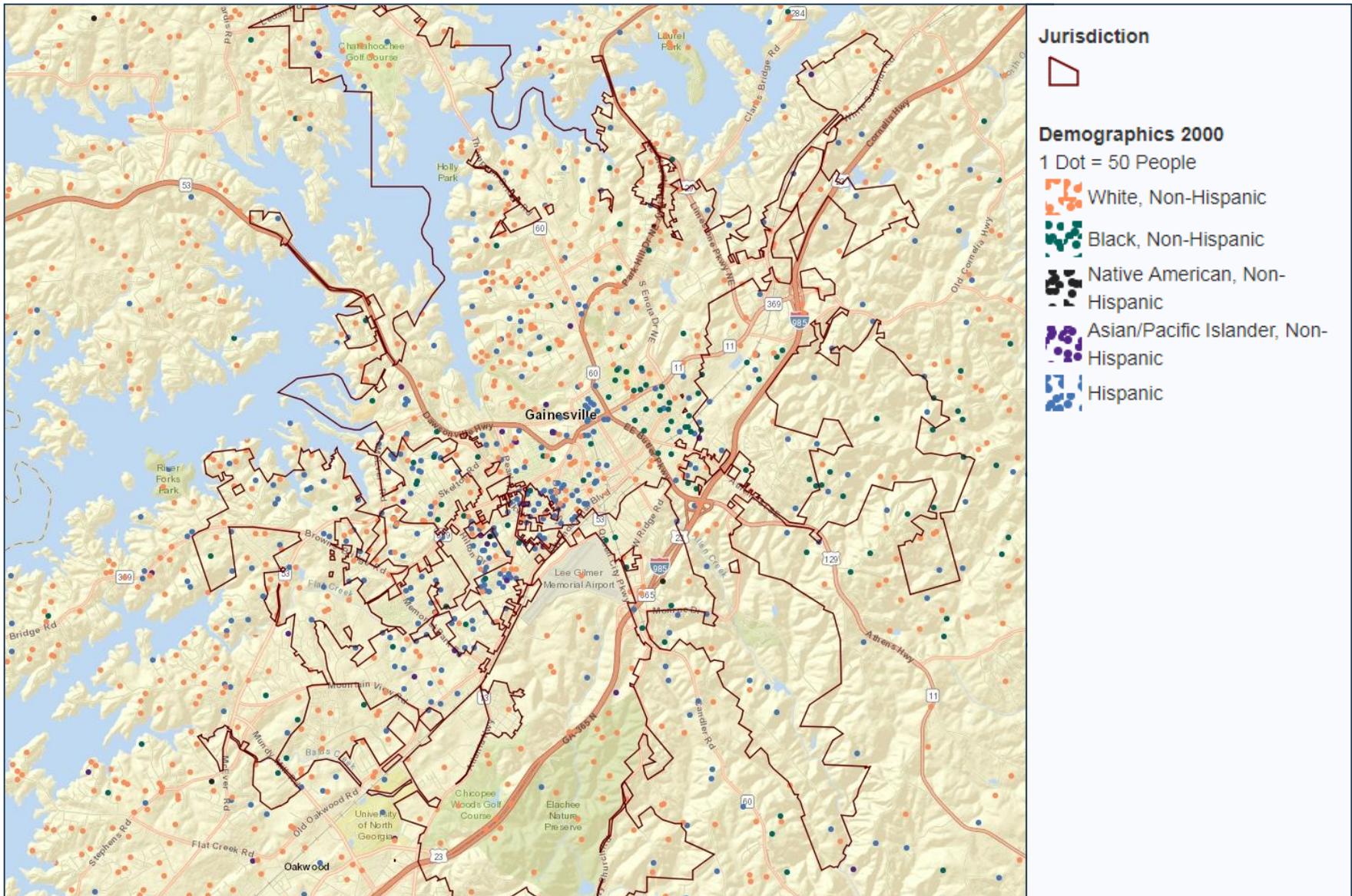
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FIGURE 2 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF GAINESVILLE, 2010



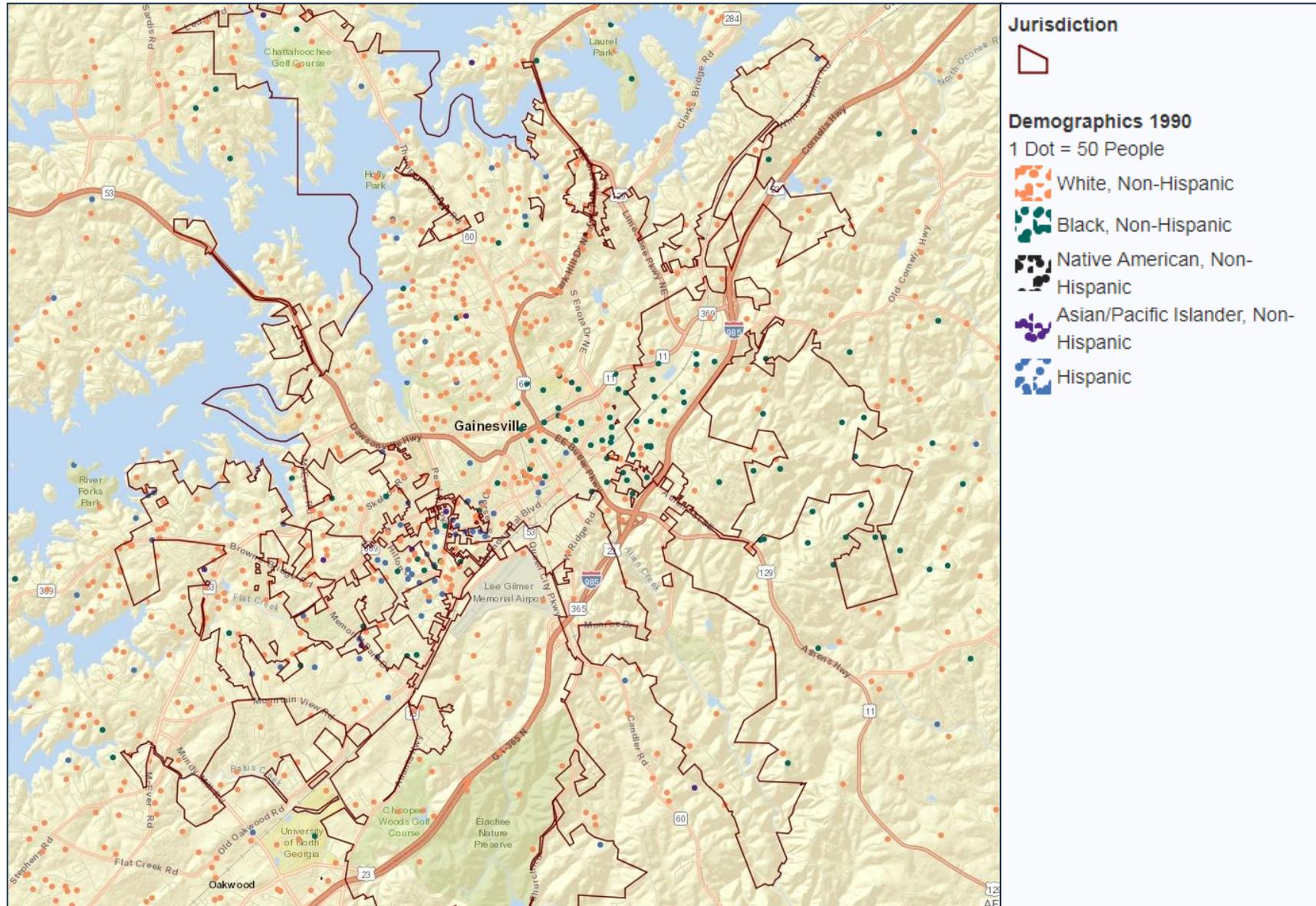
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 3 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF GAINESVILLE, 2000



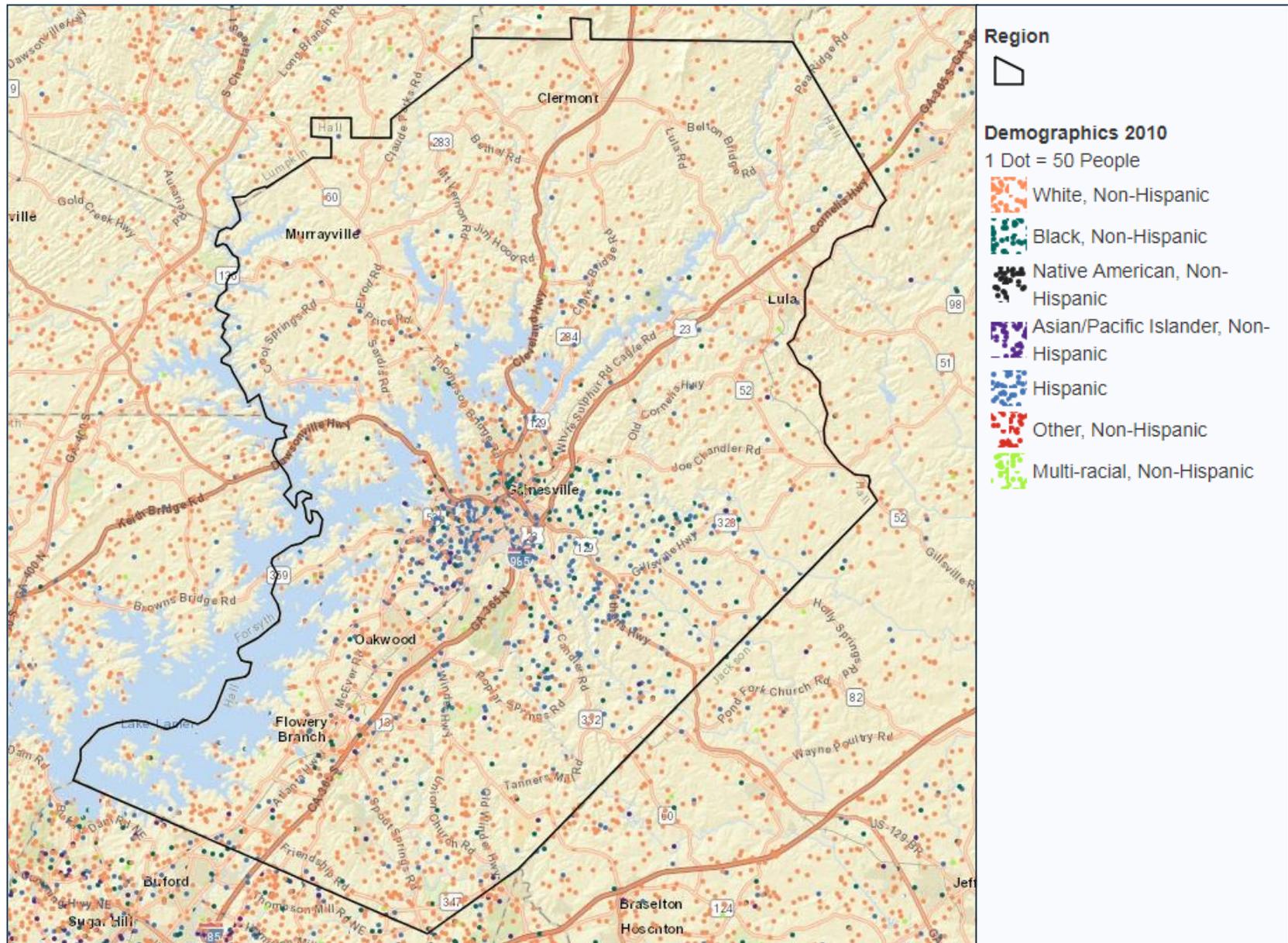
Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 4 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF GAINESVILLE, 1990



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 5 – POPULATION BY RACE AND ETHNICITY IN HALL COUNTY, 2010



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

SEGREGATION LEVELS

In addition to visualizing Gainesville’s racial and ethnic composition with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

The table below shares the dissimilarity indices for four pairings in Gainesville and Hall County. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “current” figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations.⁷ This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the “current” figures calculated using block groups.

The Dissimilarity Indices calculated for each pairing in 2010 show moderate levels of segregation for all pairings except Asian or Pacific Islander/white in the city of Gainesville. The highest DI value of 51.92 was calculated for the Hispanic/white pairing. The Asian or Pacific Islander/white pairing resulted in a DI of 32.23, the lowest of all pairings. DI for non-white/white and Black/white pairings declined from 1990 to 2010. Conversely, DI for Hispanic/white and Asian or Pacific Islander/white pairings increased during the same period. DI values for the Hispanic/white pairing dropped to near low segregation levels between 1990 and 2000 before increasing to a value of over 50 in 2010. The Black/white pairing is the only group to experience a consistent trend between the years of 1990 and 2010. Current figures show similar levels of segregation across all groups in 2010 with the largest discrepancies found among figures

⁷ Iceland, John and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

This study of the effect of using census block groups instead of tracts to examine housing pattern in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 points for all metro area dissimilarity scores.

for Black/white and Asian or Pacific Islander/white pairings that show higher levels of segregation at the block group level.

Segregation levels for all pairings except Asians or Pacific Islanders and whites were slightly higher within the moderate segregation range in Hall County compared to the city in 2010. DI values for all pairings in the county follow similar trends found among the same pairings in the city between 1990 and 2010. Current figures in Hall County show the Hispanic/white pairing breaches the threshold for high segregation levels with a DI value of 55.81. Current figures also indicate significantly higher levels of segregation among Black/white pairings in the county compared to the city and figures from tract-level calculations.

TABLE 4 – RACIAL / ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	City of Gainesville				Hall County			
	Trends			Current (2010)	Trends			Current (2010)
	1990	2000	2010		1990	2000	2010	
Non-White/White	51.0	43.8	47.8	47.5	51.8	48.1	48.2	52.0
Black/White	61.0	51.6	41.5	44.0	60.1	52.6	43.6	51.0
Hispanic/White	45.9	42.1	51.9	51.6	49.4	49.2	52.9	55.8
Asian or Pacific Islander/White	27.2	36.6	32.2	36.1	36.7	41.1	30.7	38.0

Data Sources: Decennial Census

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The majority of foreign-born population in the city of Gainesville reside in the southwest regions of the city. The distribution pattern of the largest foreign-born population, residents originating from Mexico, are consistent with population density throughout the city of Gainesville. Residents originating from El Salvador, Vietnam, Honduras, and Guatemala comprise the other largest foreign-born population groups and almost exclusively reside in the southwest regions of the city. There are only small populations of residents from El Salvador, Vietnam, and Honduras scattered in neighborhoods along the northern boundaries.

The geographic distribution of residents with limited English proficiency (LEP) is nearly identical with the residential patterns of the foreign-born population with a heavy concentration found in neighborhoods in the southwest. The LEP population in the city of Gainesville is overwhelmingly Spanish-speaking with Vietnamese-speaking residents comprising the second largest LEP group. German and Chinese-speaking residents comprise a very small percentage of the population, but are the third and fourth largest LEP groups, respectively.

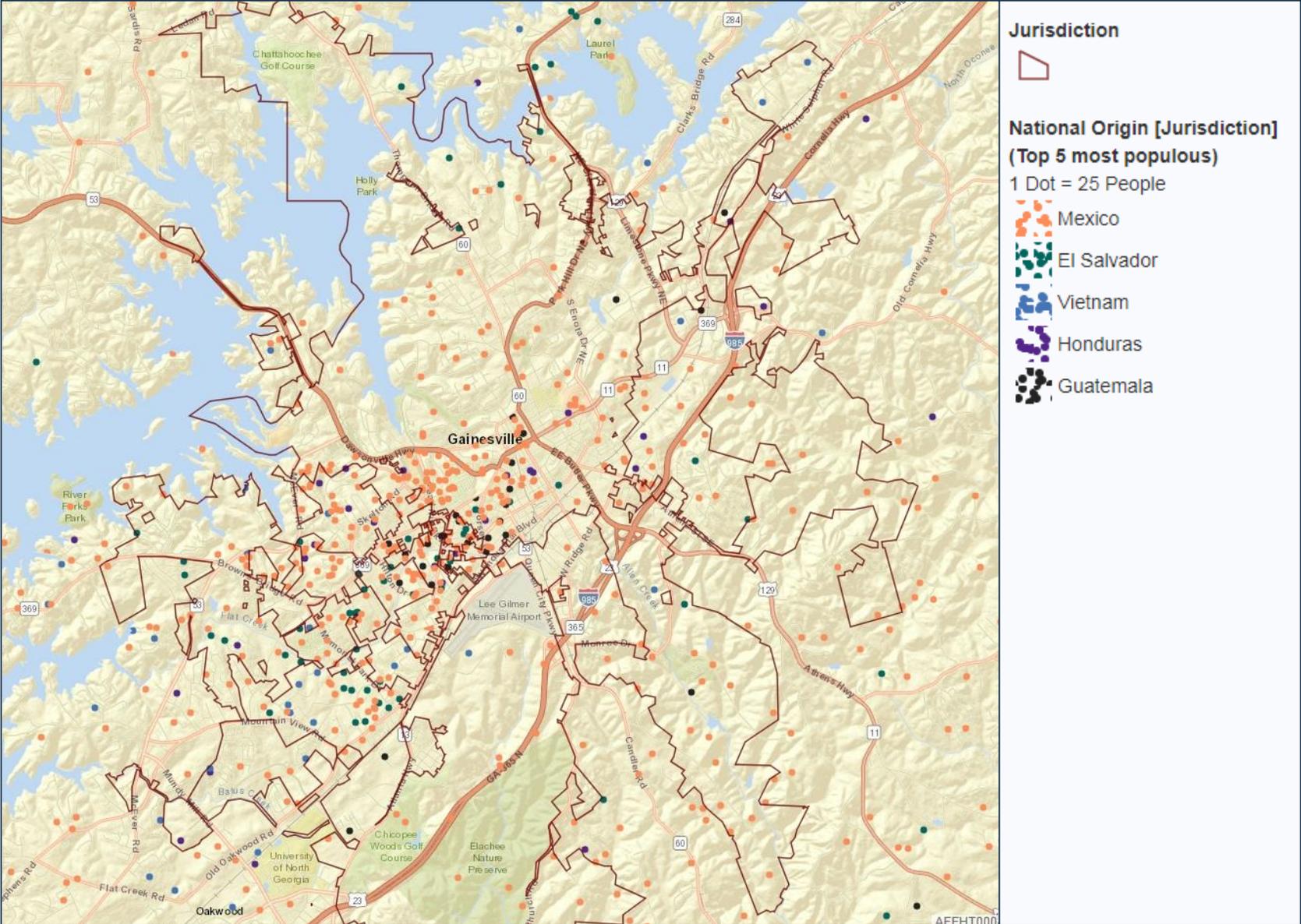
⁸ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁹ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹⁰ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

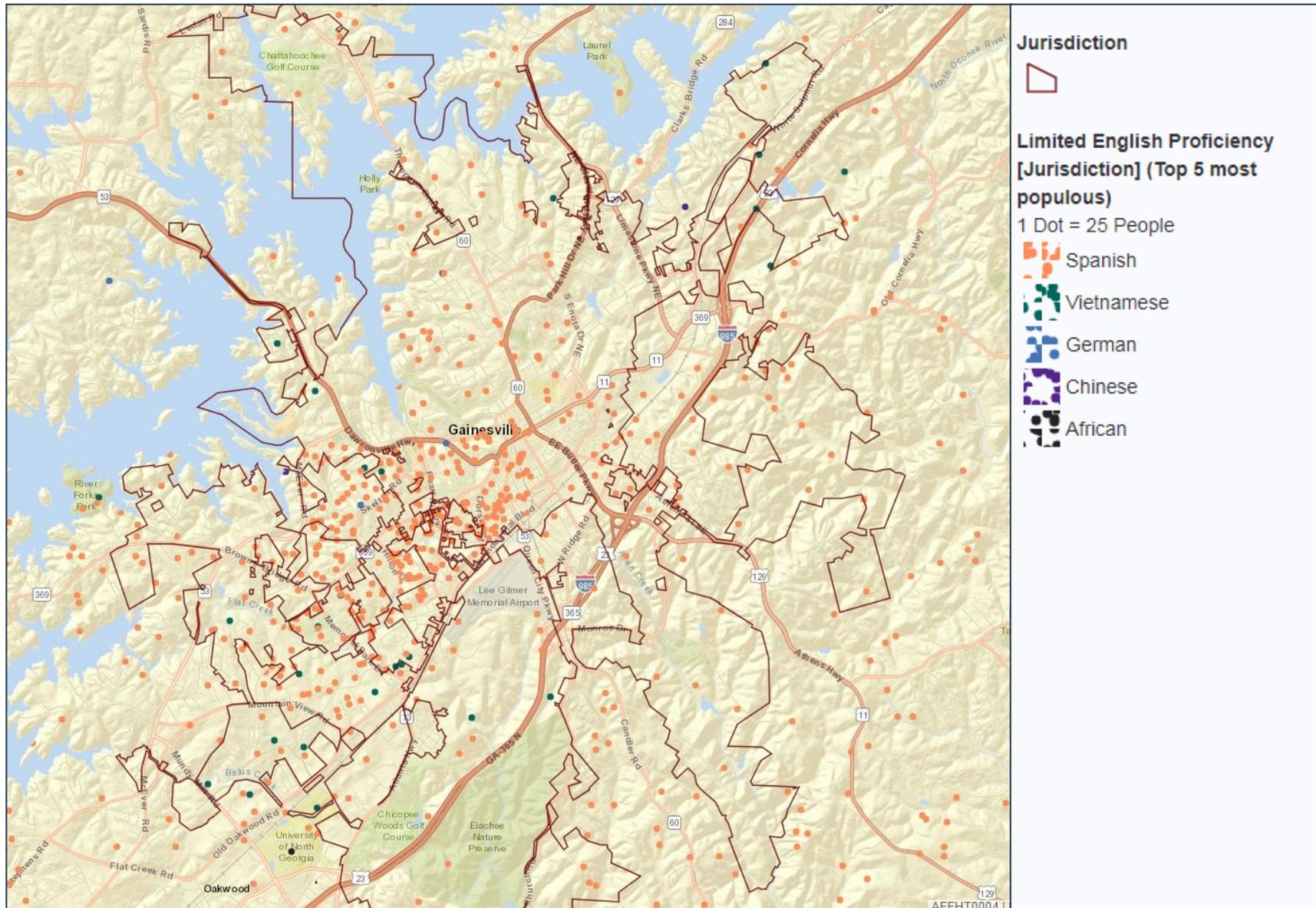
¹¹ Golding, E., Goodman, L., & Strohach, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

FIGURE 6 – FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 7 – POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

CHAPTER 5.

ACCESS TO OPPORTUNITY

Housing discrimination and residential segregation have limited access to opportunity for specific population groups and communities. It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, researchers who interviewed residents of Baltimore, Maryland on this subject found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while whites, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.¹²

Proximity is often used to indicate levels of access to opportunity, however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.¹³ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.¹⁴

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow mobility of recipients to locate in lower-poverty areas while programs like the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

¹² Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

¹³ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

¹⁴ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

OVERVIEW OF HUD-DEFINED OPPORTUNITY FACTORS

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

Average index values by race and ethnicity for the city and county are provided in Table 5 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the white non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the white non-Hispanic group. A positive score indicates that the subgroup has a higher score than the white non-Hispanic Group.

Figures 8-17 map each of the opportunity dimensions along with demographic information such as race and ethnicity.

TABLE 5 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of Gainesville – Total Population									
School Proficiency Index	23.9	24.6	23.8	23.6	22.0	0.7	-0.1	-0.3	-1.9
Jobs Proximity Index	68.7	70.3	74.0	73.3	72.7	1.6	5.4	4.7	4.0
Labor Market Index	50.8	37.5	35.9	46.5	43.7	-13.3	-14.8	-4.3	-7.0
Transit Index	69.2	73.0	68.9	66.0	70.6	3.8	-0.3	-3.2	1.4
Low Transportation Cost Index	33.2	36.4	38.7	34.4	36.6	3.2	5.4	1.2	3.4
Low Poverty Index	21.2	15.0	12.6	20.2	17.6	-6.2	-8.6	-1.0	-3.6
Environmental Health Index	46.6	39.1	34.8	41.8	40.2	-7.5	-11.8	-4.8	-6.4
City of Gainesville – Population Below Federal Poverty Line									
School Proficiency Index	26.5	25.6	23.8	20.5	20.0	-0.9	-2.7	-5.9	-6.5
Jobs Proximity Index	67.4	70.5	68.7	73.8	83.4	3.2	1.3	6.4	16.1
Labor Market Index	43.2	41.5	37.1	34.5	14.0	-1.6	-6.0	-8.7	-29.2
Transit Index	70.1	74.6	70.5	69.4	80.0	4.5	0.4	-0.7	9.9
Low Transportation Cost Index	35.3	39.7	36.9	44.1	40.0	4.5	1.6	8.9	4.7
Low Poverty Index	17.4	17.8	12.4	11.6	6.0	0.4	-4.9	-5.8	-11.4
Environmental Health Index	43.8	38.1	35.9	27.8	21.0	-5.8	-7.9	-16.0	-22.8

TABLE 5 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
Hall County – Total Population									
Low Poverty Index	44.5	27.8	24.9	37.5	42.4	-16.8	-19.6	-7.0	-2.1
School Proficiency Index	44.0	33.9	33.8	36.9	42.4	-10.2	-10.3	-7.2	-1.6
Labor Market Index	51.3	39.2	35.7	48.8	46.8	-12.1	-15.6	-2.5	-4.5
Transit Index	50.2	63.7	61.6	56.3	51.6	13.5	11.4	6.0	1.4
Low Transportation Cost Index	18.2	27.4	28.5	23.4	19.9	9.2	10.3	5.2	1.7
Jobs Proximity Index	71.5	68.5	73.8	76.0	74.2	-3.0	2.3	4.5	2.7
Environmental Health Index	56.3	46.6	44.0	48.8	54.3	-9.6	-12.3	-7.5	-1.9
Hall County – Population Below Federal Poverty Line									
Low Poverty Index	40.0	24.2	23.8	29.9	51.6	-15.9	-16.2	-10.2	11.6
School Proficiency Index	40.8	30.7	30.7	33.4	54.7	-10.1	-10.1	-7.4	13.9
Labor Market Index	45.9	41.2	37.2	45.8	64.9	-4.7	-8.6	-0.1	19.0
Transit Index	53.0	67.1	62.5	59.9	55.5	14.1	9.5	6.9	2.5
Low Transportation Cost Index	21.0	31.9	29.2	24.8	12.8	10.9	8.3	3.8	-8.2
Jobs Proximity Index	51.0	59.0	58.2	60.2	52.4	7.9	7.2	9.1	1.3
Environmental Health Index	54.9	43.7	44.2	46.1	46.4	-11.2	-10.8	-8.8	-8.5

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

EDUCATION

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles.

The map on the following page shows HUD-provided opportunity scores related to education for the city of Gainesville's block groups, along with the demographic indicators of race/ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

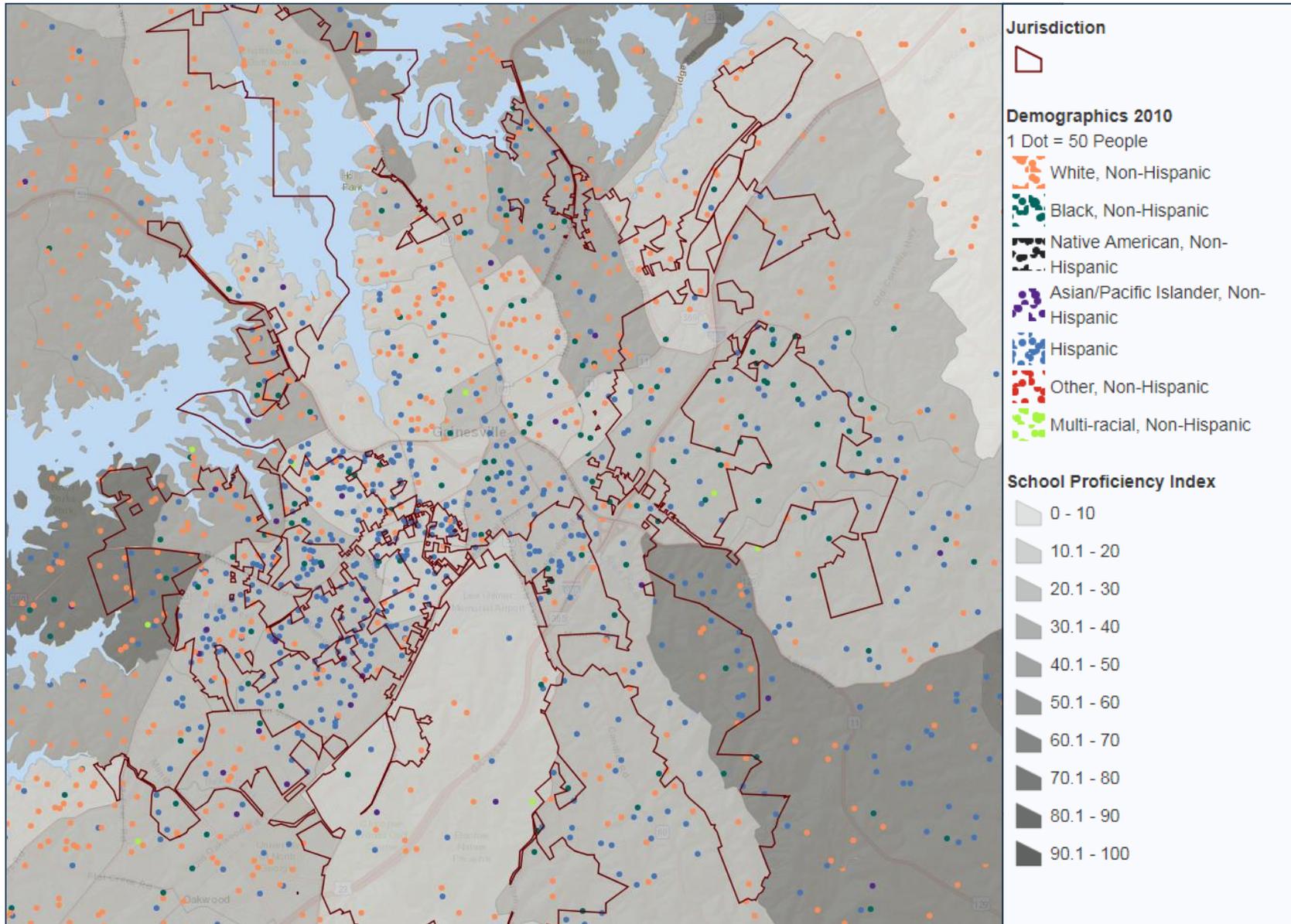
The variation in levels of access to proficient schools among block groups is relatively low for most block groups in the city of Gainesville. School proficiency index scores of block groups within city boundaries fall within the range of 11 to 65. Only a small portion of the highest scoring block group is located within city boundaries along the westernmost tip. The next highest scoring block groups are located in the Woodlake neighborhood and scored significantly lower in school proficiency with a score of 33. The majority of the lowest scoring block groups are centrally located, however, the level of school proficiency in the southernmost block group is also one of the lowest in the city.

There is some visual evidence shown in Figure 8 to indicate disproportionate representation of specific racial and ethnic groups at the block group level. The most noticeable spatial pattern shows the residential population of the lowest scoring block groups in the city appear to be predominantly white, however, some of the highest scoring block groups also appear to have a higher percentage of white residents. It is difficult to determine any correlation between race, ethnicity, and access to proficient schools at the city level from exclusively examining the spatial distribution patterns in Figure 8.

The opportunity dimension scores in Table 5 indicate overall low levels, but little disparity in access to proficient schools among racial and ethnic groups in the city of Gainesville. Hispanic populations have the least access to proficient schools with a score of 22, while Black populations have the best access with a score of 24.6. The populations below the federal poverty line experience slightly higher disparities in levels of access to proficient school, but possess similar scores to the respective population groups above the poverty line.

Both school proficiency index scores and disparities are higher among the same groups in Hall County. Black, Asian and Native American populations have significantly less access to proficient schools compared to white and Hispanic populations in the county. Levels of disparity are similar for population groups below the poverty line, however, the Hispanic population below the poverty in Hall County have the best access to proficient schools regardless of poverty status.

FIGURE 8 – SCHOOL PROFICIENCY INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

EMPLOYMENT

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.

The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

The Jobs Proximity Index scores of block groups in the city of Gainesville are mapped in Figure 9, along with the population distribution by race and ethnicity. Most block groups in the city have high levels of access to jobs. There is no distinguishable spatial pattern of the lowest scoring block groups sporadically located along the northern and westernmost boundaries of the city. There are no visual indicators shown in Figure 9 to imply any correlation between distance to jobs, race, and ethnicity.

Overall high Jobs Proximity Index scores of all groups in the city of Gainesville indicate close proximity to jobs for all racial and ethnic groups. The Jobs Proximity Index scores by race and ethnicity listed in Table 5 indicate relatively minor disparities in distance to job locations among groups above the poverty line in the city of Gainesville. Asian populations reside closest to job locations compared to other groups scoring of 5.4 points higher than the white population, the lowest scoring group. With the exception of Hispanic populations below the poverty line, levels of access remain similar among population groups below the poverty line. Hispanic populations below the poverty reside closest to job locations regardless of poverty status with a Jobs Proximity Index score that is 16.1 points higher than the lowest scoring group.

Jobs proximity by race and ethnicity in Hall County are similar to figures found in the city of Gainesville, however, index scores of population groups below the poverty line are generally lower compared to the city. Disparities in access to jobs among racial and ethnic groups below the poverty line in the county are also slightly greater with white populations below the poverty line scoring the lowest among all groups.

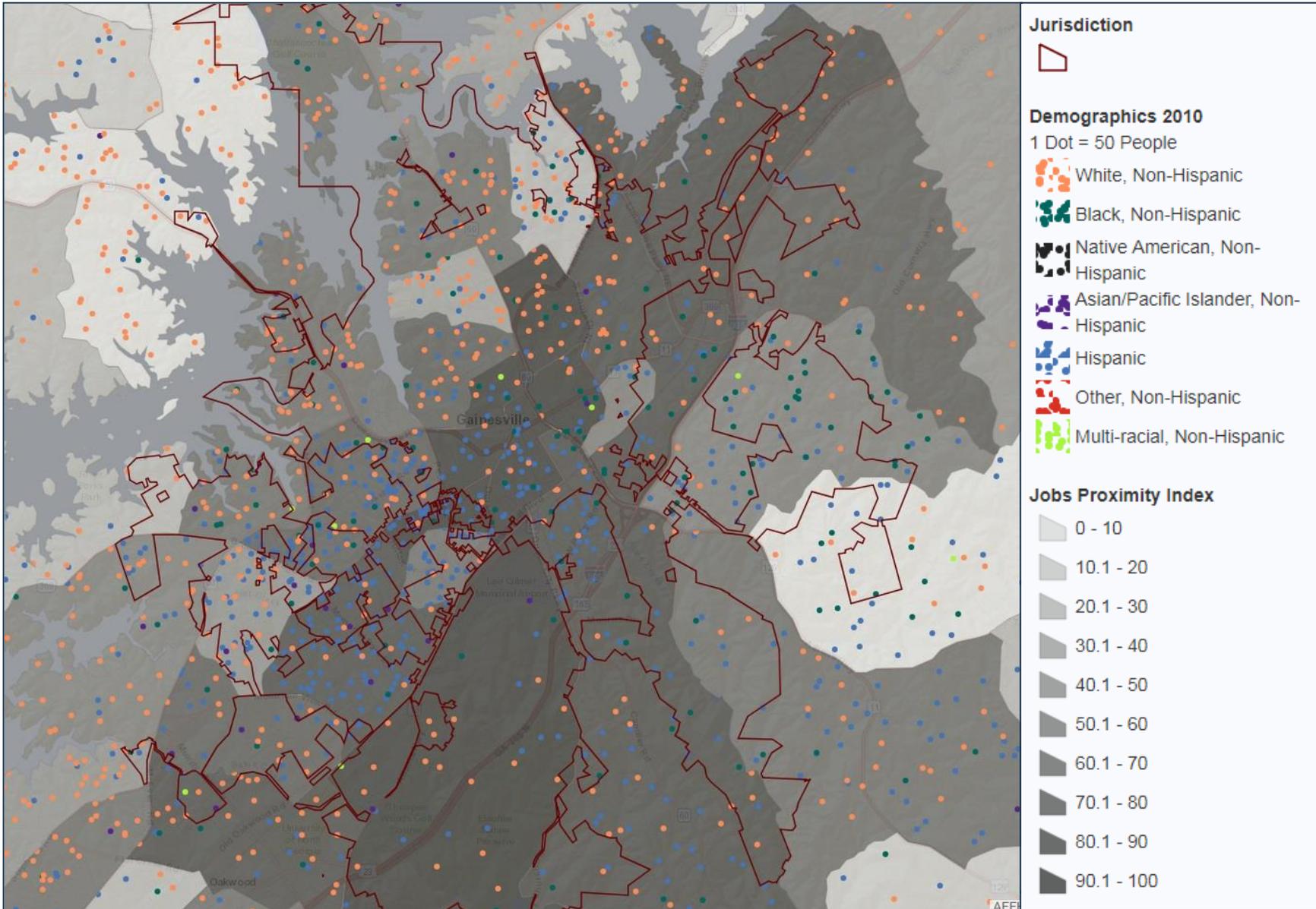
The variation in levels of labor market engagement among block groups is high in the city of Gainesville with school proficiency index scores ranging from the lowest score of 6 to the highest score of 64. Block groups with the highest and lowest labor market engagement are both located in the southernmost block groups of the city. Although Figure 10 alone does not provide strong visual evidence that would imply correlation between race, ethnicity, and labor market engagement, the population of the higher scoring block groups in the north seem to be predominantly white.

Compared to the relatively minor disparities in job proximity, the Labor Market Index scores in Table 5 indicate significant disparities among racial and ethnic groups. The white population above the poverty line has highest level of engagement with the labor market among all groups. The greatest disparity in labor market engagement with a difference of 36.8 points is between the white population above the poverty line and the Hispanic population below the poverty line. Black and Asian populations above the poverty line also experience significantly less labor market engagement compared to the white population above the poverty line.

Labor Market Engagement Index scores and disparities among groups in Hall County closely reflect figures found in the city of Gainesville with the exception of one significant difference. The Hispanic population below the poverty line in the county scored the highest among all population groups regardless of poverty status in both the city and county. The point differential between the Hispanic population below the poverty line in the city and the county is over 50 points.

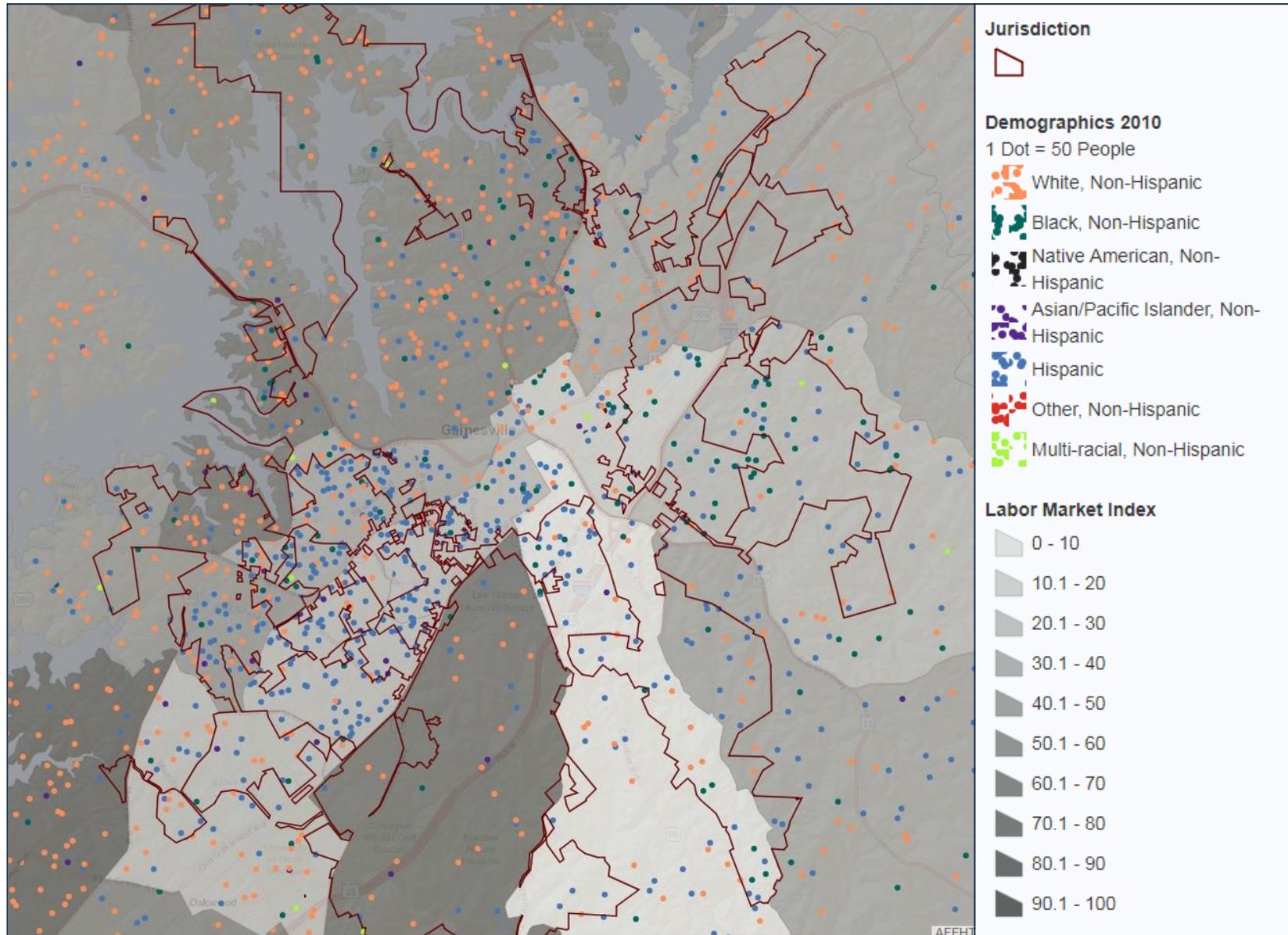
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FIGURE 9 – JOBS PROXIMITY INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 10 – LABOR MARKET INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

TRANSPORTATION

The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The higher the Low Transportation Cost Index, the lower the cost of transportation in that block group. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

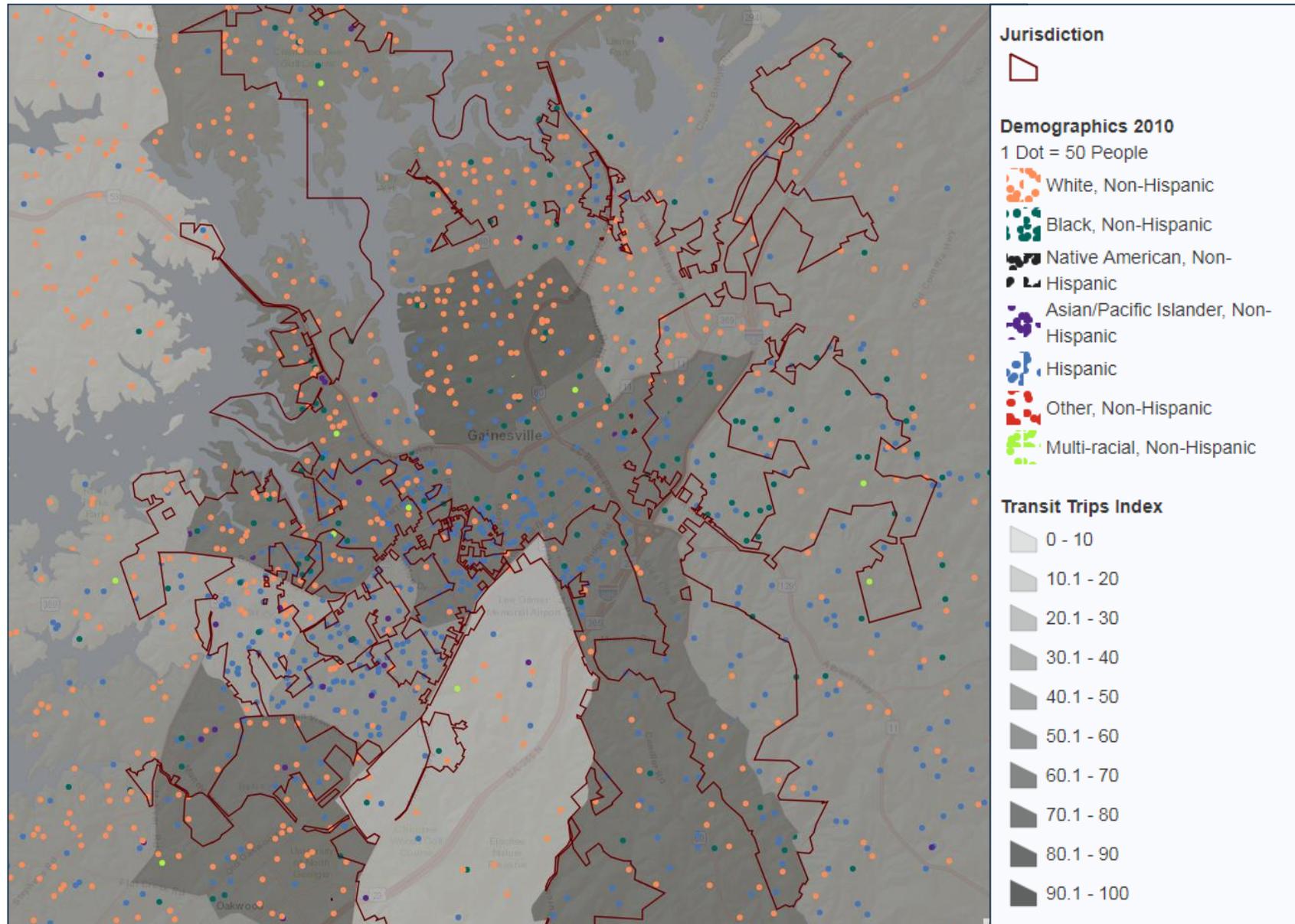
Transit usage is generally high and relatively uniform throughout most block groups in the city of Gainesville. The highest transit usage in the city occurs in centrally located block groups north of John W. Morrow Junior Parkway. The lowest scoring block group contains Lee Gilmer Memorial Airport and is the southernmost block group of the city.

Transit Trip Index scores indicate little disparity in levels of transit usage among racial and ethnic groups in the city of Gainesville. The Hispanic population below the poverty line have the highest levels of transit usage followed by Black populations both above and below the poverty line. Compared to populations above the poverty line, transit use increases slightly for all racial and ethnic groups below the poverty line.

Transit usage is generally lower for all groups in Hall County. Disparities among racial and ethnic groups are also greater in the county with a 16.9-point differential between the highest and lowest scoring groups. According to index scores, Black populations both above and below the poverty line use public transportation most frequently in the county. All non-white populations in Hall County have higher transit usage than white populations.

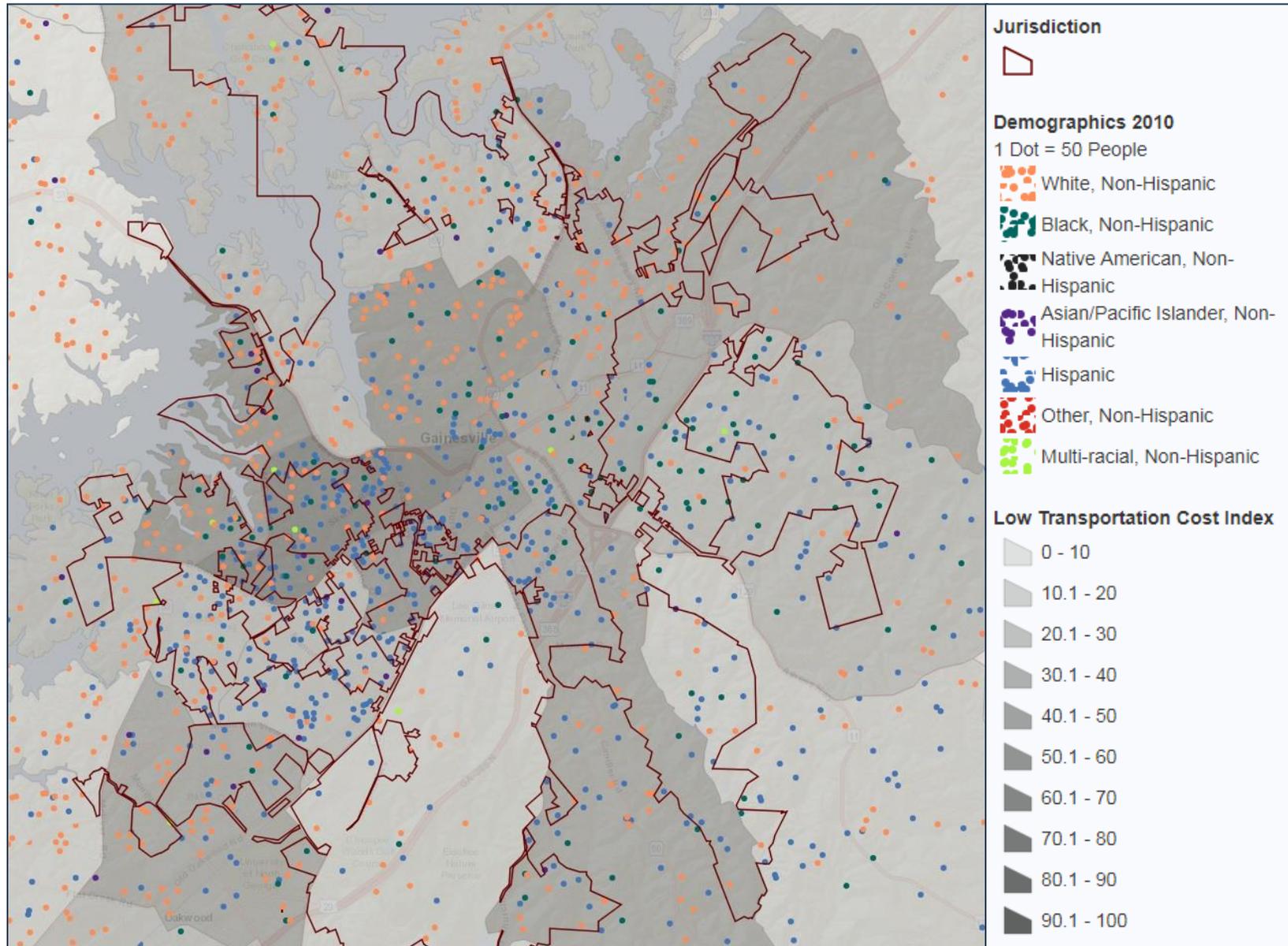
Figure 12 shows Low Transportation Cost scores are generally low and uniform throughout most block groups in the city of Gainesville. Low Transportation Cost scores deviate slightly from Transit Trip Index score patterns observed among racial and ethnic groups, however, disparities remain relatively minor between groups. Transportation costs are similar for populations both above and below the poverty line with the Native American population below the poverty line scoring the highest. All non-white populations in the city experience lower transportation costs and closer proximity to public transportation compared to white populations. Low Transportation Index scores are lower overall while disparities are higher among racial and ethnic groups in the county. The Hispanic population below the poverty line is the lowest scoring population group in the county by a significant margin.

FIGURE 11 – TRANSIT TRIPS INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 12 – LOW TRANSPORTATION COST INDEX IN THE CITY OF GAINESVILLE

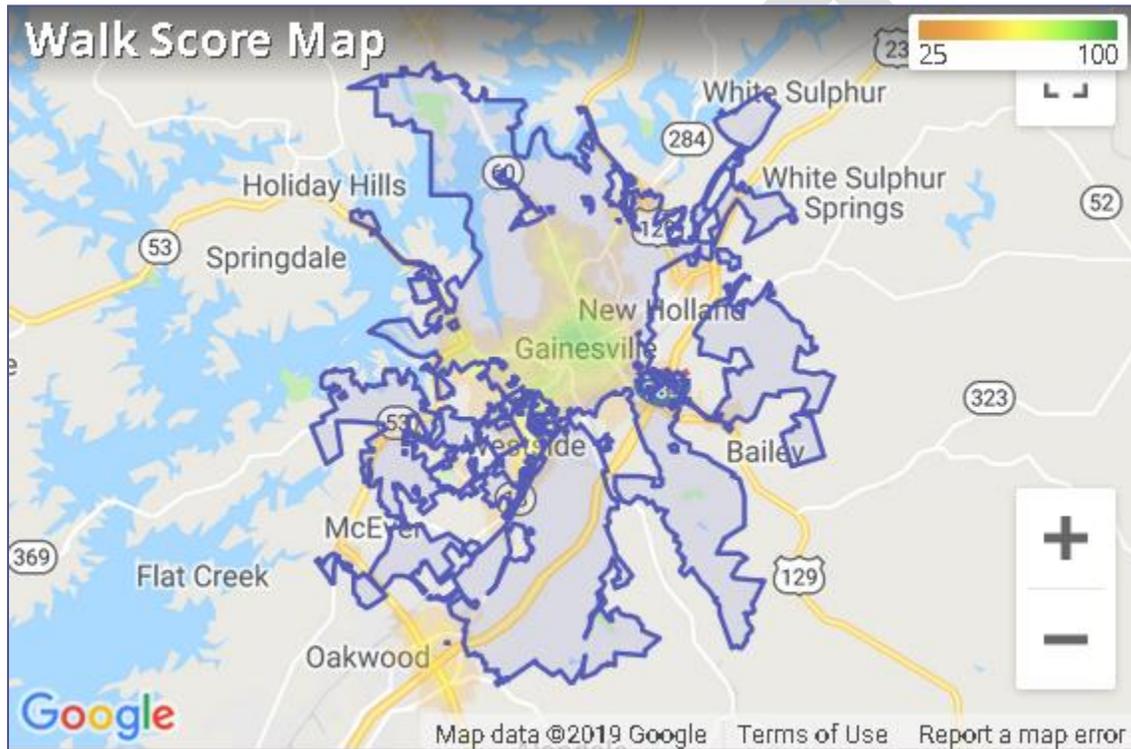


Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. The most walkable areas in the city of Gainesville are centrally located in the downtown and business district. Major thoroughfares throughout the city are also shown as somewhat conducive to walking.

FIGURE 13 – WALKABILITY IN THE CITY OF GAINESVILLE



Data Source: Walkscore, Retrieved from: <https://www.walkscore.com/GA/Gainesville>

POVERTY

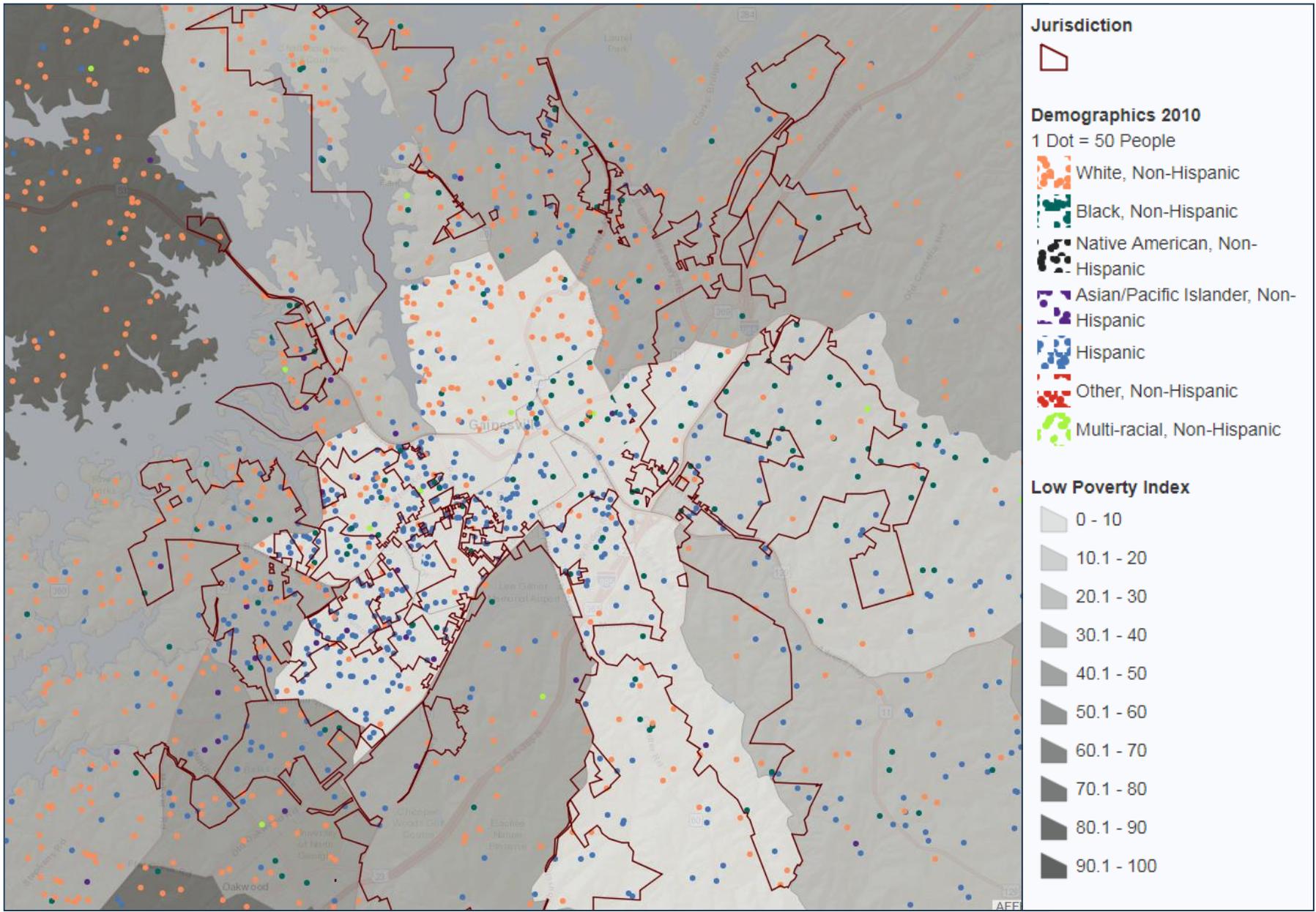
Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of higher levels of poverty and darker shading indicates lower levels of poverty.

Figure 14 shows the concentrations of poverty by block group in the city of Gainesville. The majority of block groups in the city have Low Poverty Index scores below 10 which implies a large portion of the population are exposed to high levels of poverty. Compared to the rest of the block groups in the city, residents of neighborhoods in the southernmost block group have the least exposure to poverty. Block groups along the northern borders of the city also experience lower exposure to poverty, however, scores remain below 30 in these block groups.

Low Poverty Index scores in Table 5 show overall low scores and moderate disparities among racial and ethnic groups. The Asian population is exposed to the highest levels of poverty among population groups above the poverty line. The Hispanic population below the poverty line experience the greatest exposure to poverty among all populations in the city of Gainesville. The white population above the poverty line is the least exposed to poverty, however, a low score of 21.2 implies exposure to high levels of poverty.

Low Poverty Index scores of racial and ethnic groups in Hall County are significantly higher compared to the city, however, disparities between groups are also significantly greater there. White and Hispanic populations above the poverty line experience the lowest exposure to poverty in the county. Conversely, Black and Asian populations in the county are exposed to significantly higher levels of poverty.

FIGURE 14 – LOW POVERTY INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

ENVIRONMENTAL HEALTH

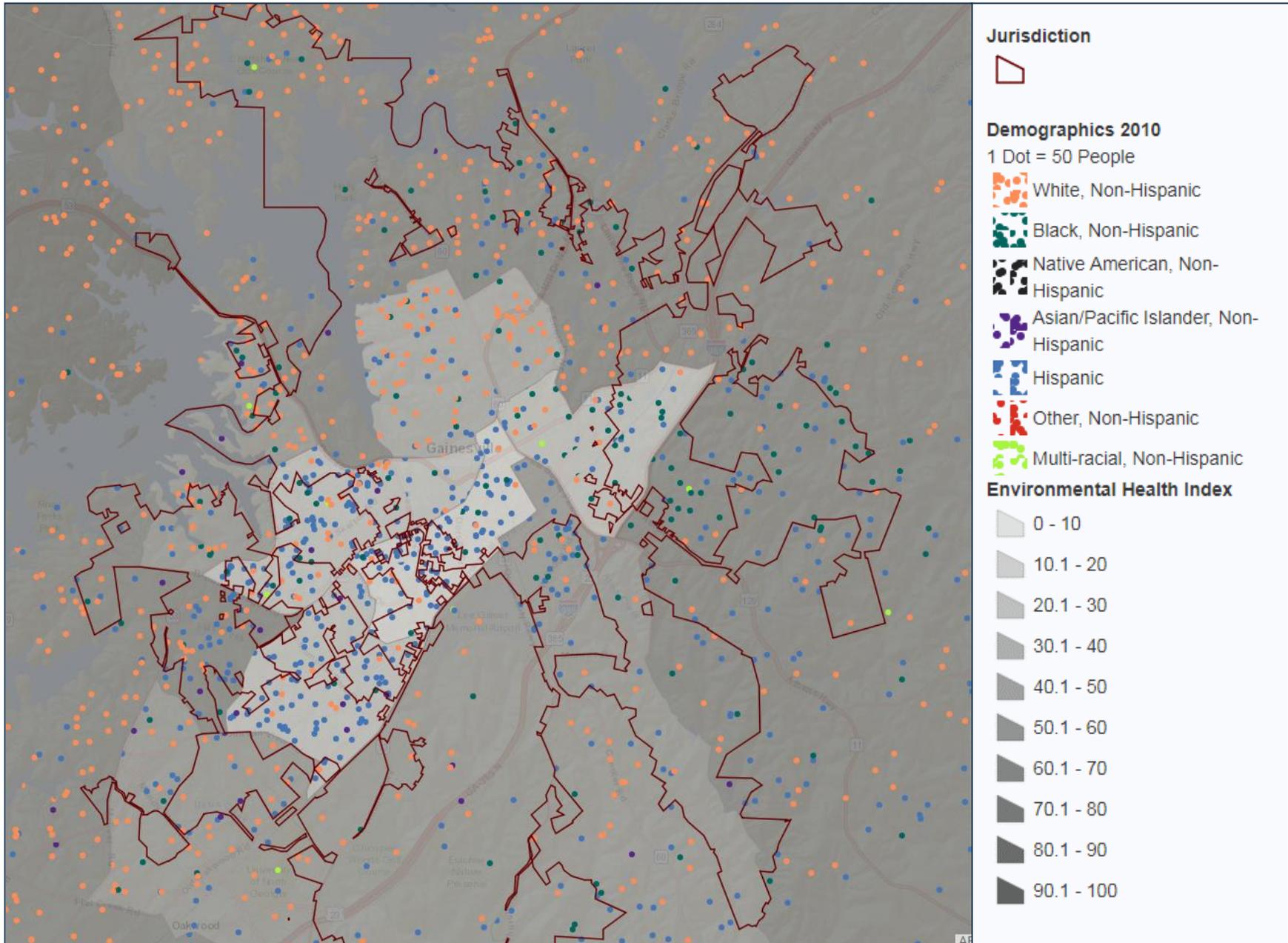
HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

The worst air quality is found in block groups located near the center of the city. Spatial distribution patterns of racial and ethnic groups in Figure 15 appear to show an overrepresentation of Hispanic residents in the lowest scoring block groups, however, it is difficult to discern any other correlation between racial composition of block groups and air quality from the spatial data provided.

The Environmental Health Index scores in the city of Gainesville suggest moderate disparities in exposure to low air quality among racial and ethnic groups. The Hispanic population below the poverty line experiences the greatest exposure to low air quality by a significant margin of 25.6 points. All non-white populations regardless of poverty status in the city are exposed to lower air quality than white populations.

Air quality throughout Hall County is slightly better as evidenced by the higher scores, but moderate disparities among population groups similar to the city are also found in the county. All non-white populations in the county are exposed to lower air quality than white populations. Index scores suggest Black and Asian populations reside in areas in the county with the lowest air quality.

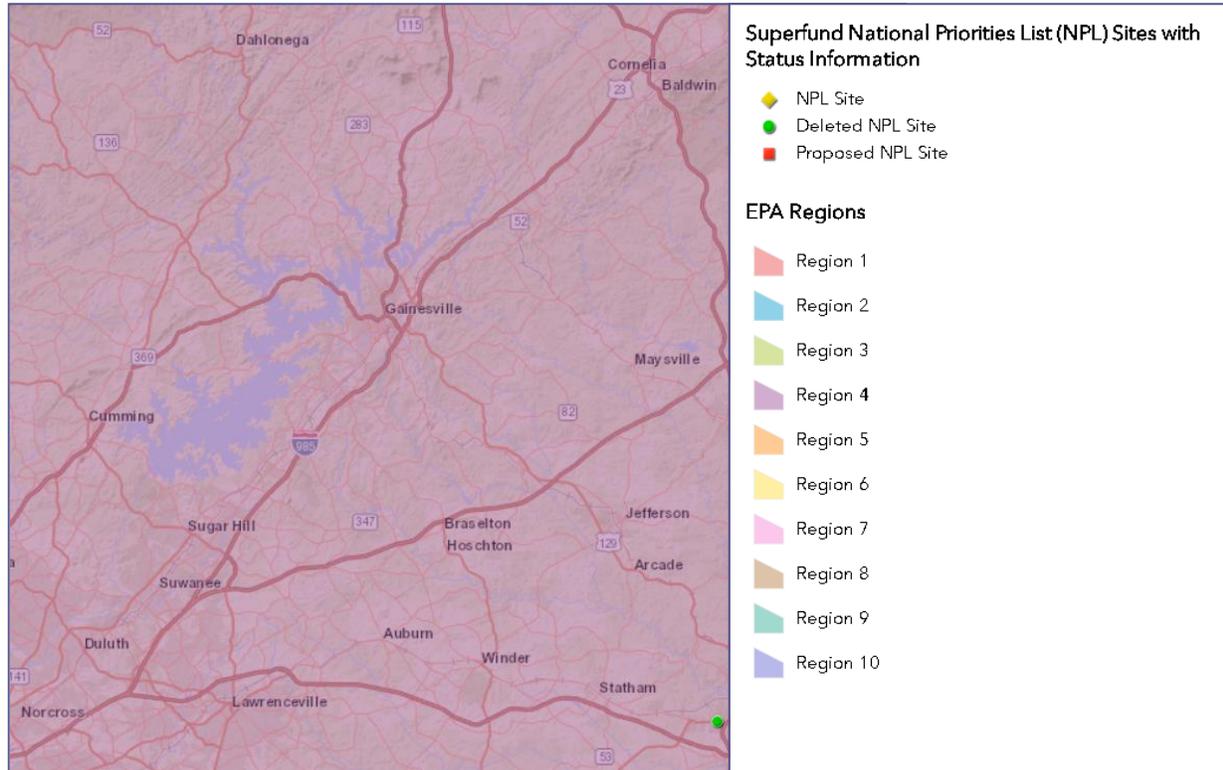
FIGURE 15 – ENVIRONMENTAL HEALTH INDEX IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There are no Superfund sites in Gainesville or Hall County.

FIGURE 16 – SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE CITY OF GAINESVILLE AREA

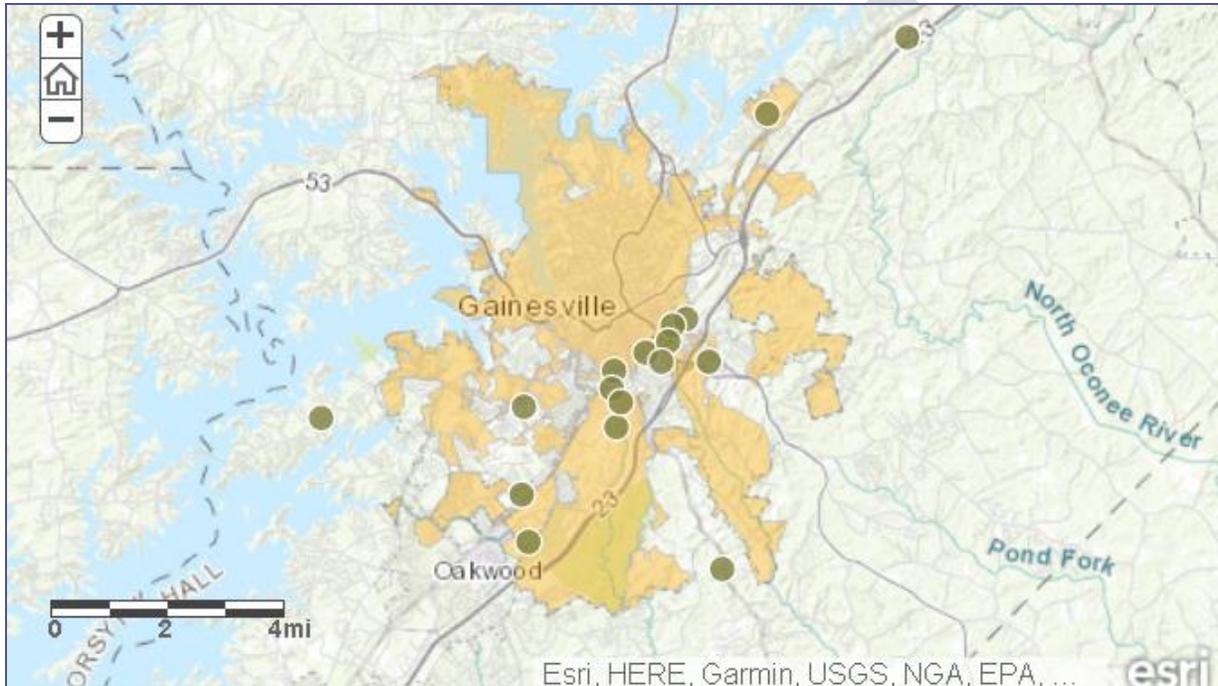


Data Source: Environmental Protection Agency, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

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The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. There is a total of fourteen sites located either within or in close proximity to the boundaries of the city of Gainesville. Most of the sites are concentrated near the airport or along city borders south of Jesse Jewell Parkway.

FIGURE 17 – TOXIC RELEASE INVENTORY (TRI) IN THE CITY OF GAINESVILLE



Data Source: Environmental Protection Agency GIS Data, Retrieved from:
https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?&pstate=GA&pcity=gainesville&pyear=2017&pParent=TRI&pDataSet=TRIQ1

SUMMARY

Spatial patterns and index scores show moderate to significant disparities in labor market engagement, exposure to poverty, and air quality among racial and ethnic groups in the city of Gainesville. Conversely, spatial data and index scores suggest only minor disparities in access to proficient schools, jobs proximity, transit usage, and transportation costs.

The variation in levels of access to proficient schools among block groups is relatively low for most block groups in the city of Gainesville. There is some visual evidence to indicate disproportionate representation of specific racial and ethnic groups at the block group level, however, opportunity dimension scores indicate overall low levels, but little disparity in access to proficient schools among racial and ethnic groups at the city level. There is only a 2.6- point differential between the groups with the best and worst access to proficient schools.

Most block groups in the city of Gainesville have high levels of access to jobs. High Jobs Proximity Index scores of all groups in the city indicate close proximity to jobs for all racial and ethnic groups. Jobs Proximity Index scores by race and ethnicity indicate relatively minor disparities in distance to job locations among racial and ethnic groups with one exception. The Hispanic population below the poverty line scored 16.1 points higher than the lowest scoring group.

Compared to the relatively minor disparities in job proximity, Labor Market Index scores indicate significant disparities among racial and ethnic groups in labor market engagement. The white population above the poverty line has highest level of engagement with the labor market among all groups. The greatest disparity in labor market engagement with a difference of 36.8 points is between the white population above the poverty line and the Hispanic population below the poverty line.

Transit Trip Index scores indicate little disparity in levels of transit usage among racial and ethnic groups in the city of Gainesville. Compared to populations above the poverty line, transit use increases slightly for all racial and ethnic groups below the poverty line.

Low Transportation Cost scores are generally low and uniform throughout most block groups in the city and disparities are relatively minor between groups. All non-white populations in the city experience lower transportation costs and closer proximity to public transportation compared to white populations.

The majority of block groups in the city have Low Poverty Index scores below 10 which implies a large portion of the population are exposed to high levels of poverty. The Hispanic population below the poverty line experience the greatest exposure to poverty among all populations in the city. The white population above the poverty line is the least exposed to poverty, however, a low score of 21.2 implies exposure to high levels of poverty.

The worst air quality is found in block groups located near the center of the city. Environmental Health Index scores suggest moderate disparities in exposure to low air quality among racial and ethnic groups. The Hispanic population below the poverty line experiences the greatest exposure to low air quality by a significant margin of 25.6 points. All non-white populations regardless of poverty status in the city are exposed to lower air quality than white populations.

CHAPTER 6.

HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.¹⁵ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.¹⁶ Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.¹⁷

This section discusses the existing supply of housing in the city of Gainesville and Hall County. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

HOUSING SUPPLY SUMMARY

According to the 2013-2017 American Community Survey, there are 13,962 housing units in the city of Gainesville, an increase of 4,886 new units since 2000 or about 53.8%. Hall County added 19,831 units during that time period, or about 38.8%. Vacancy rates increased in the city by about 4.0 percentage points from 2000 to 2017. It is unclear from this data to what extent the increase was because of lack of

¹⁵ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

¹⁶ "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

¹⁷ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

absorption of new units or more vacancies in existing units as residents left them for the new units, or some other factor, possibly including second homes or short term rentals near the lake. The national average vacancy rate is 12.2%, so the city’s 9.9% rate is not abnormally high. These rates, all calculated from ACS data, include housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Thus, the actual shares of rental and for-sale units that are available for occupancy are likely lower than these figures indicate.

TABLE 6 – HOUSING UNITS BY OCCUPANCY STATUS

	2000	2010	2013-2017	2000 to 2017 Change
City of Gainesville				
Total Housing Units	9,076	12,967	13,962	53.8%
Occupied Housing Units	8,537	11,273	12,582	47.4%
Vacant Housing Units	539	1,694	1,380	156.0%
Vacancy Rate	5.9%	13.1%	9.9%	+4.0 points
Hall County				
Total Housing Units	51,046	68,825	70,877	38.8%
Occupied Housing Units	47,381	60,691	63,095	33.2%
Vacant Housing Units	3,665	8,134	7,782	112.3%
Vacancy Rate	7.2%	11.8%	11.0%	+3.8 points

Data Source: U.S. Census 2000 SF1 Table H003 and 2010 SF1 Table H3 and 2013-2017 5-Year American Community Survey Table B25002

Variety in terms of housing structure type is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable than single-family homes for low- and moderate-income households, who are disproportionately likely to be households of color. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

The table that follows shows housing units by structure type in each area. In Gainesville, just under half of units (48.9%) are in either attached or detached single-family homes, about a third (36.7%) are in small multifamily properties (2 to 19 units) and about 14% are in larger multifamily properties (20 or more units per structure). The housing stock in Gainesville is more diverse than in Hall County overall, where over two-thirds of units are either attached or detached single-family homes (75.2%). Apartments of all types are more common in Gainesville than in Hall County. While development regulations and consumer preferences impact multifamily development, it can also be limited in rural areas due to the lack of sufficient infrastructure – specifically, water and sewer – to support higher density development. Mobile homes are much more common in the county than in Gainesville (10.7% compared to 1.6% in Gainesville).

TABLE 7 – HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	City of Gainesville		Hall County	
	Number	Percent	Number	Percent
1, detached	6,069	43.5%	50,899	71.8%
1, attached	751	5.4%	2,440	3.4%
2 to 4	1,036	7.4%	2,227	3.1%
5 to 19	3,953	28.3%	5,019	7.1%
20 to 49	975	7.0%	1,253	1.8%
50 or more	954	6.8%	1,485	2.1%
Mobile home	224	1.6%	7,554	10.7%
Other (RV, boat, van, etc.)	0	0.0%	0	0.0%
Total	13,962	100.0%	70,877	100.0%

Data Source: 2013-2017 5-Year American Community Survey Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

As the table that follows shows, owner-occupied housing is typically larger than renter-occupied units. Units with two or fewer bedrooms make up only about 18% of owned housing in the city of Gainesville. In contrast, more than two-thirds (68.6%) of rental housing in Gainesville has two or fewer bedrooms. The trend is consistent in the county, with 13.7% of owner-occupied units having two or fewer bedrooms compared to over half (53.5%) of renter-occupied units.

TABLE 8 – HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	City of Gainesville		Hall County	
	Number	Percent	Number	Percent
Owner Occupied				
Zero or one	55	1.2%	603	1.4%
Two	770	16.9%	5,252	12.3%
Three	2,092	45.8%	21,563	50.7%
Four or more	1,649	36.1%	15,154	35.6%
Total	4,566	100.0%	42,572	100.0%
Renter Occupied				
Zero or one	1,908	23.8%	3,144	15.3%
Two	3,590	44.8%	7,831	38.2%
Three	2,103	26.2%	7,384	36.0%
Four or more	415	5.2%	2,164	10.5%
Total	8,016	100.0%	20,523	100.0%

Data Source: 2013-2017 5-Year American Community Survey Table B25042

Table 9 provides information for households living in publicly supported housing, including unit size and presence of children by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number of households with children does not immediately indicate overcrowding in assisted housing. For example, the 216 households with children who live in public housing properties could theoretically be housed in the 276 units with two or more bedrooms. Likewise, there appear to be adequate units with two or more bedrooms for the 189 households with children living in project-based Section 8 units and the 33 that participate in the housing choice voucher program.

However, because data about households with children by household size is not available, precise conclusions regarding the suitability of the existing publicly supported housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernible without information about household size. Additionally, smaller households may reside in units with more bedrooms (a 2-person household without children living in a 2-bedroom unit, for example), reducing the availability of larger units for households with children.

TABLE 9 – PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: UNITS BY NUMBER OF BEDROOMS AND NUMBER OF CHILDREN IN THE CITY OF GAINESVILLE

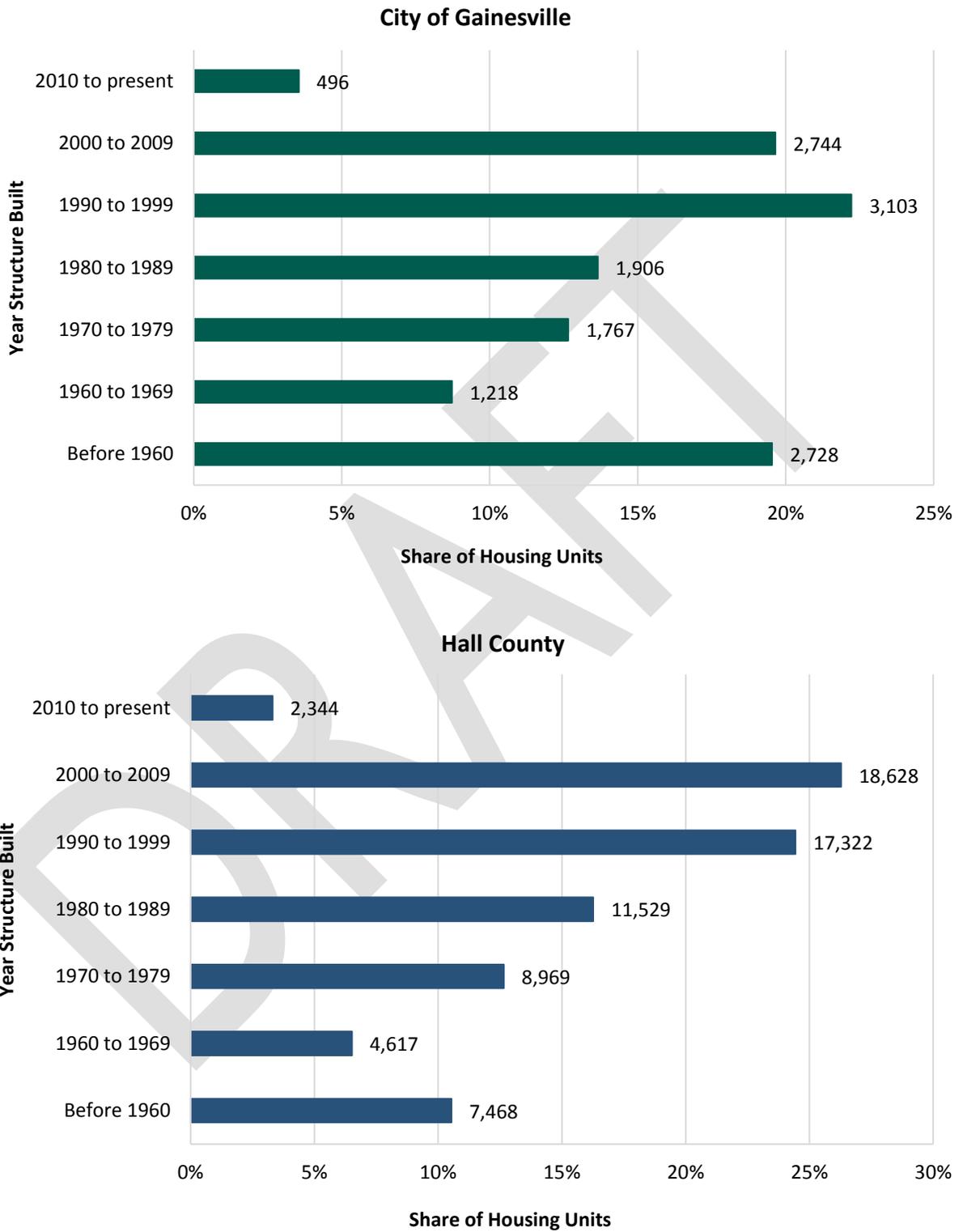
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	79	21.9%	146	40.6%	130	36.1%	216	60.0%
Project-Based Section 8	111	30.3%	199	54.2%	55	15.0%	189	51.5%
Other Multifamily	75	100.0%	0	0.0%	0	0.0%	N/A	N/A
HCV Program	20	23.3%	36	41.9%	15	17.4%	33	38.4%

Data Source: APSH

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint.

Age of housing in the city of Gainesville and Hall County is shown on the following page. In Gainesville, the largest share of homes was built either over 50 years ago, prior to 1960 (19.5%), or much more recently, after 1990 (45.4%). Much less housing was built in the intervening years, 1960-1990. In the county, housing is generally newer, as a much smaller share was built before 1960 (10.5%) and an even larger share after 1990 (54.0%) than in the city.

FIGURE 18 – HOUSING UNITS BY AGE IN GAINESVILLE AND HALL COUNTY



Data Source: 2013-2017 American Community Survey Table B25034

HOUSING COSTS AND AFFORDABILITY

The National Low Income Housing Coalition’s annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. The figure on the next page shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in Hall County for one, two, and three bedroom rental units.

To afford a one-bedroom rental unit at the Hall County Fair Market Rent (FMR) of \$725 without being cost burdened (i.e., spending more than 30% of income on housing) would require an annual income of at least \$29,000. This amount translates to a 40-hour work week at an hourly wage of \$14, or a 77-hour work week at the minimum wage of \$7.25. For people with incomes equal to Hall County’s average renter wage of \$16.28 an hour, a one-bedroom unit would be affordable with at least a 37-hour work week. Hall County’s two-bedroom FMR of \$847 translates to an hourly wage of \$16, a 90-hour work week at minimum wage, or a 44-hour work week at the average renter wage.

These figures indicate that housing in Hall County is challenging to afford for small households earning below the average renter wage. Other groups, such as minimum wage workers, other low-income households, and larger families needing more bedrooms face even greater difficulty affording housing. The next section looks in more detail at affordability in the city and county.

FIGURE 19 – INCOME AND WAGES NEEDED TO AFFORD FAIR MARKET RENTS IN HALL COUNTY



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in Hall County is \$7.25. Average renter wages are \$16.28 in Hall County.

Data Source: National Low Income Housing Coalition *Out of Reach* 2018, Accessed from <http://nlihc.org/oor/georgia>

HOUSING NEEDS

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.

2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Gainesville and Hall County is provided in the tables that follow.

In the city, there are 5,165 households with at least one housing problem, making up 46.8% of households citywide. Over one-in-four households have a severe need (3,055 or 27.7%). Levels of need in the Gainesville region are lower; 35.7% of households have a housing problem and 18.9% have a severe housing problem.

Looking at need by householder race and ethnicity in the city of Gainesville shows that 34.0% of non-Latino white households have a housing problem and 17.6% have a severe housing problem. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households. In the city, African American (56.1%) and Hispanic households (66.7%) have disproportionate rates of needs. Looking at severe housing needs, all non-white groups showed disproportionate rates of needs, with Hispanic (46.8%), Native American (33.3%) and African American (27.6%) households showing highest rates of need, versus 17.6% for whites.

In Hall County, housing needs are lower overall but higher than in the city for Asian and Native American households. All racial and ethnic groups have disproportionate rates of housing need. Rates are highest for Native American and Hispanic households, among which more than half have one or more housing problems (59.0% and 57.6%, respectively), compared to 28.8% of white households.

Table 10 also compares housing need rates for households by size and familial status. In the city of Gainesville, large family households (5 or more people) have the highest rate of housing problems at 79.6%. Non-family households are the second highest at 47.1%, and 36.9% of small family households (2 to 4 people) have a housing problem.

A similar pattern exists in Hall County. The share of households with housing problems is lowest for small families at 28.1%, higher for non-family households (42.0%), and highest for large households (57.1%).

Table 11 examines only one dimension of housing need – severe cost burdens. In the city of Gainesville, 1,890 households (17.1%) spend more than half of their income on housing. Looking at severe cost burdens by householder race and ethnicity, only Native American households are disproportionately likely to have needs relative to whites, 33.3%, compared to 13.1% of white households. Housing cost burdens are less common overall in the county, but Native Americans have an even higher disproportionate need, 43.6% compared to 11.9% of white households.

Non-family households are most likely to spend more than 50% of their income on housing in the city and county with rates at 21.3 and 20.4% respectively. In Gainesville, small family households are more likely than large family households to have a severe cost burden (15.7% and 12.1% respectively).

Figures 20 and 21 map the prevalence of housing cost burdens in the city of Gainesville along with population by race, ethnicity, and national origin. The highest rates of housing needs are in the southwest portion of the city from downtown to Mountain View Road, bounded by Browns Bridge Road and Atlanta Road, which includes Westside. Over half of households in this area have one of the four housing problems. The rate is highest for the tract including downtown (70.9%). Neighborhoods in these areas have larger percentages of Hispanic residents than the city overall.

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TABLE 10 – HOUSING NEEDS BY RACE AND ETHNICITY IN GAINESVILLE AND HALL COUNTY

Disproportionate Housing Needs	City of Gainesville			Hall County		
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity						
White, Non-Hispanic	1,970	5,789	34.0%	12,945	44,885	28.8%
Black, Non-Hispanic	969	1,726	56.1%	2,155	4,414	48.8%
Hispanic	2,075	3,109	66.7%	6,035	10,484	57.6%
Asian or Pacific Islander, Non-Hispanic	144	329	43.8%	425	910	46.7%
Native American, Non-Hispanic	15	45	33.3%	115	195	59.0%
Other, Non-Hispanic	0	45	0.0%	139	327	42.5%
Total	5,165	11,040	46.8%	21,825	61,220	35.7%
Household Type and Size						
Family households, <5 People	2,045	5,539	36.9%	10,405	37,065	28.1%
Family households, 5+ People	1,285	1,615	79.6%	4,845	8,499	57.0%
Non-family households	1,840	3,905	47.1%	6,580	15,670	42.0%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with Problems	# with problems	# of households	% with Problems
Race and Ethnicity						
White, Non-Hispanic	1,020	5,789	17.6%	6,040	44,885	13.5%
Black, Non-Hispanic	479	1,726	27.6%	1,045	4,414	23.7%
Hispanic	1,455	3,109	46.8%	4,055	10,484	38.7%
Asian or Pacific Islander, Non-Hispanic	90	329	27.4%	295	910	32.4%
Native American, Non-Hispanic	15	45	33.3%	95	195	48.7%
Other, Non-Hispanic	0	45	0.0%	44	327	13.5%
Total	3,055	11,040	27.7%	11,580	61,220	18.9%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

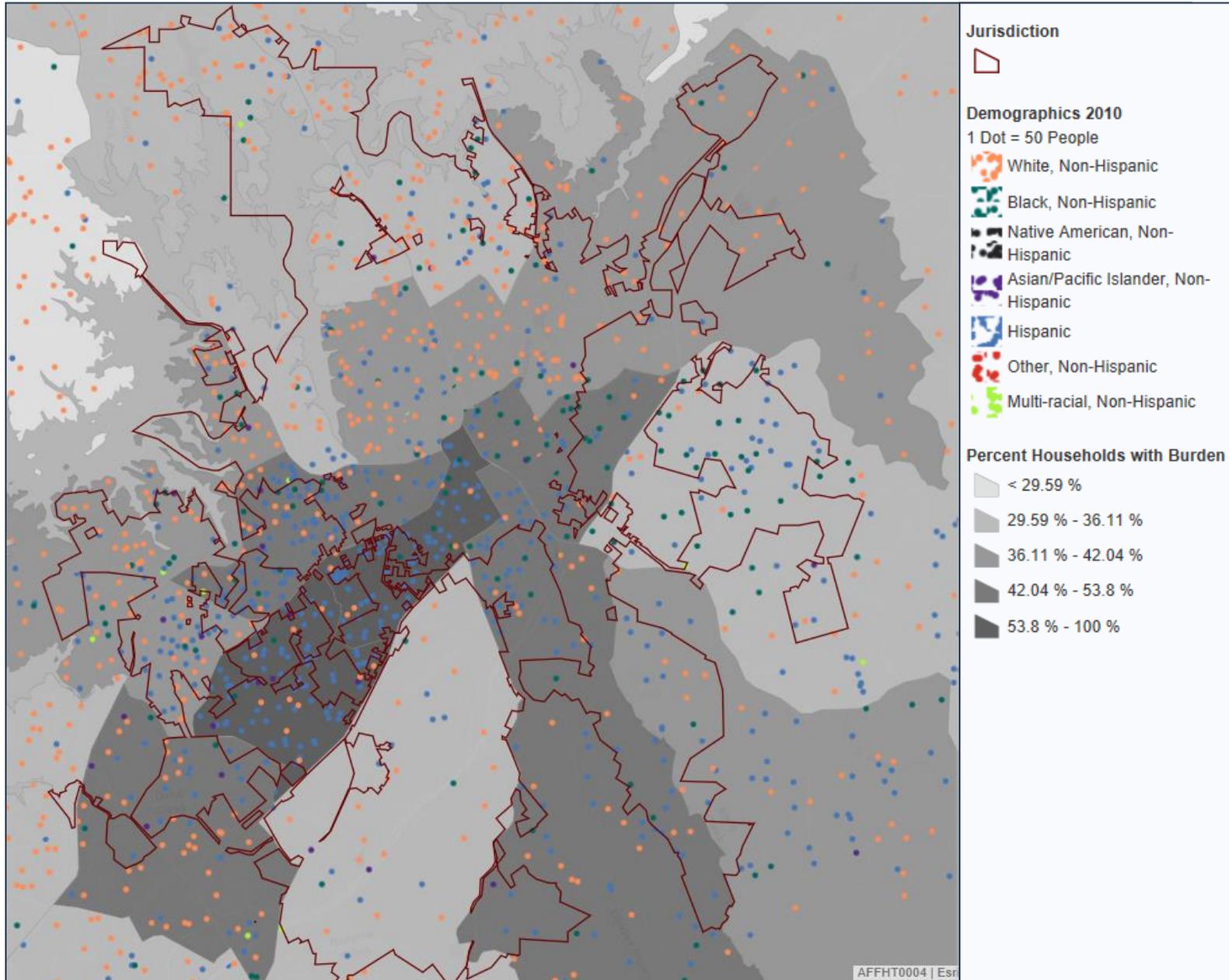
TABLE 11 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Households with Severe Cost Burdens	City of Gainesville			Hall County		
	# with problems	# of households	% with Problems	# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-Hispanic	925	5,789	16.0%	5,345	44,885	11.9%
Black, Non-Hispanic	345	1,726	20.0%	815	4,414	18.5%
Hispanic	525	3,109	16.9%	2,080	10,484	19.8%
Asian or Pacific Islander, Non-Hispanic	80	329	24.3%	180	910	19.8%
Native American, Non-Hispanic	15	45	33.3%	85	195	43.6%
Other, Non-Hispanic	0	45	0.0%	55	327	16.8%
Total	1,890	11,040	17.1%	8,560	61,220	14.9%
Household Type and Size						
Family households, <5 People	870	5,539	15.7%	4,125	37,065	11.1%
Family households, 5+ People	195	1,615	12.1%	1,240	8,499	14.6%
Non-family households	830	3,905	21.3%	3,200	15,670	20.4%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

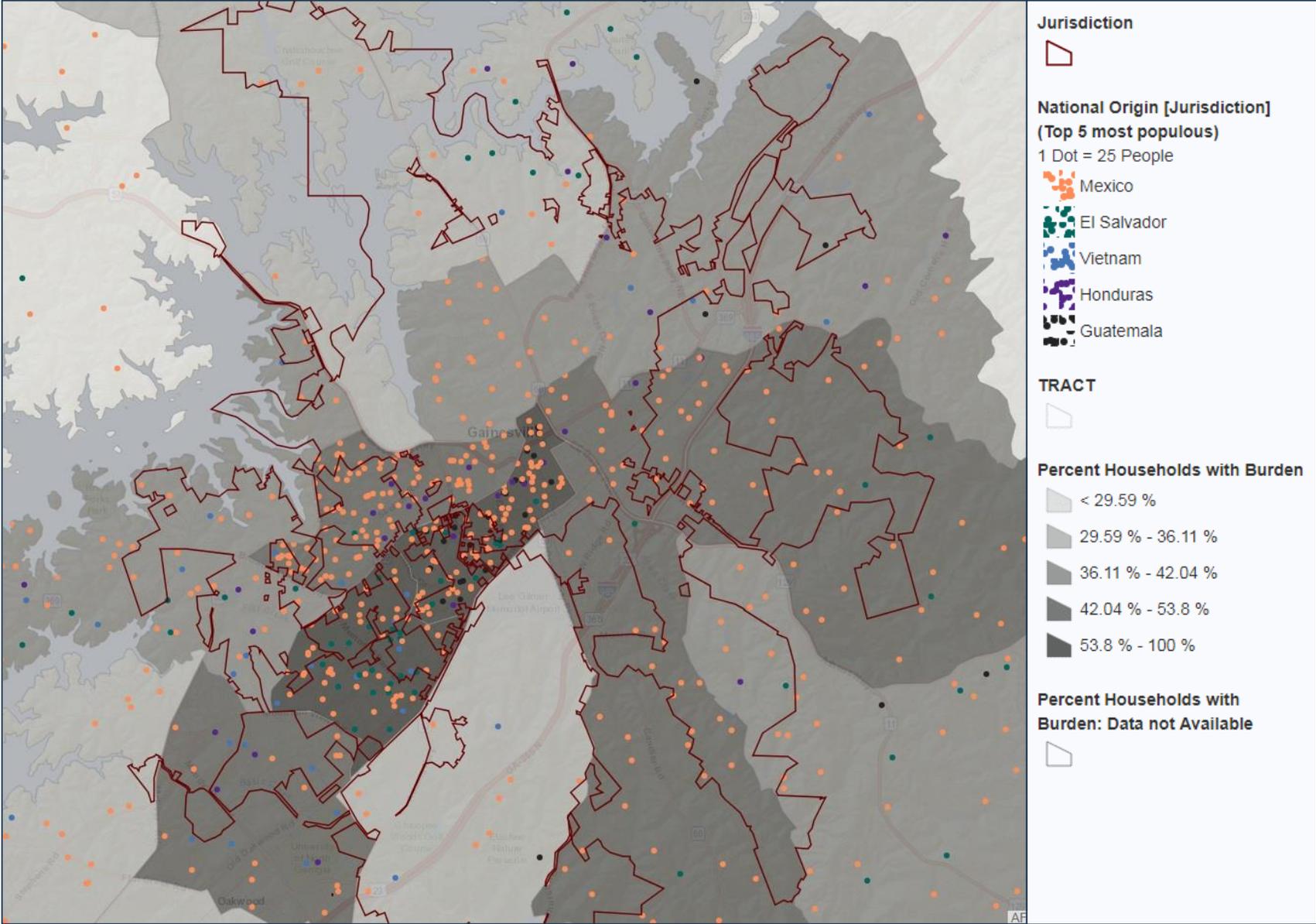
Source: CHAS

FIGURE 20 – HOUSING COST BURDENS AND RACE AND ETHNICITY IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 21 – HOUSING COST BURDENS AND NATIONAL ORIGIN IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,¹⁸ and is correlated with positive cognitive and behavioral outcomes among children.¹⁹

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. Nationally, the gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.²⁰

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.²¹

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for the city of Gainesville and Hall County. In the city, 34% of households own their homes. White households have much higher homeownership rates than all other groups, even accounting for their larger share of the population (52.4% of households are white, while white households make up 75.5% of all homeowner households). Hispanic and Black households have homeownership rates that are below their share of total households. This trend is evident in Hall County as well. While homeownership gaps depend on race, ethnicity, and geography, overall, tenure data indicates that households of color (excluding Asian households) are less likely than white households to own their homes.

The maps that follow show the share of owners and renters by census tract in the city of Gainesville and the surrounding area. Renting is most common in the central city, with Downtown and the neighborhoods to the south and east containing 83% households who are renters. Just north of downtown, 57% of households are renters, and in the tract to the northeast, 59% are renters.

¹⁸ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

¹⁹ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²⁰ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

²¹ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

TABLE 12 – HOMEOWNERSHIP RATE BY RACE AND ETHNICITY IN CITY OF GAINESVILLE AND HALL COUNTY

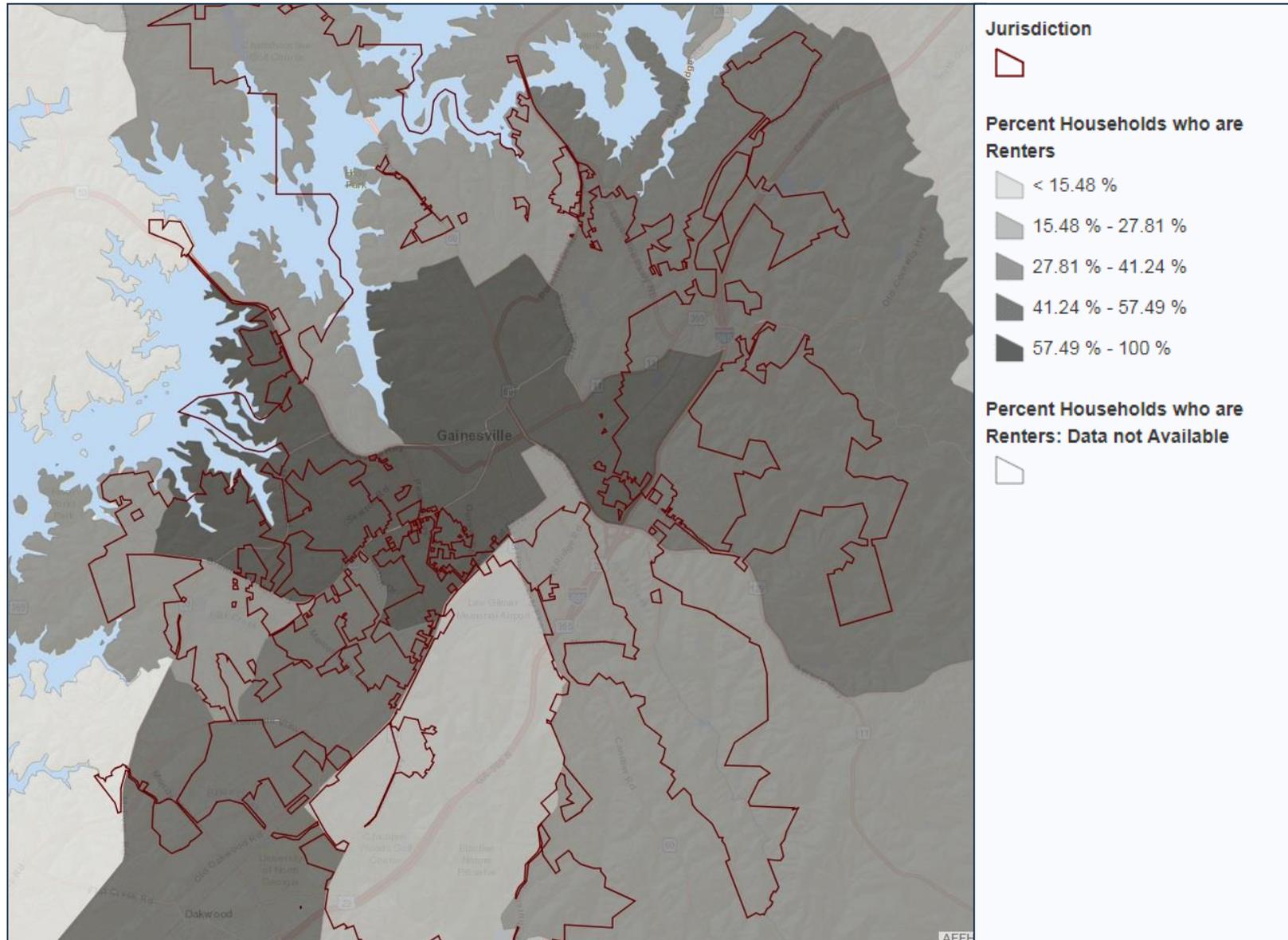
Property Type	City of Gainesville			Hall County		
	Owners	Renters	Home Ownership Rate	Owners	Renters	Home Ownership Rate
Non-Hispanic						
White	2,745	3,035	47.5%	33,635	11,255	74.9%
Black	240	1,479	14.0%	2,065	2,345	46.8%
Asian	239	85	73.8%	635	270	70.2%
Native American	0	45	0.0%	80	110	42.1%
Other	0	45	0.0%	185	150	55.2%
Hispanic	555	2,560	17.8%	4,905	5,580	46.8%
Total	3,785	7,255	34.3%	41,510	19,710	67.8%

Note: Data presented are number of households, not individuals.

Data Sources: CHAS

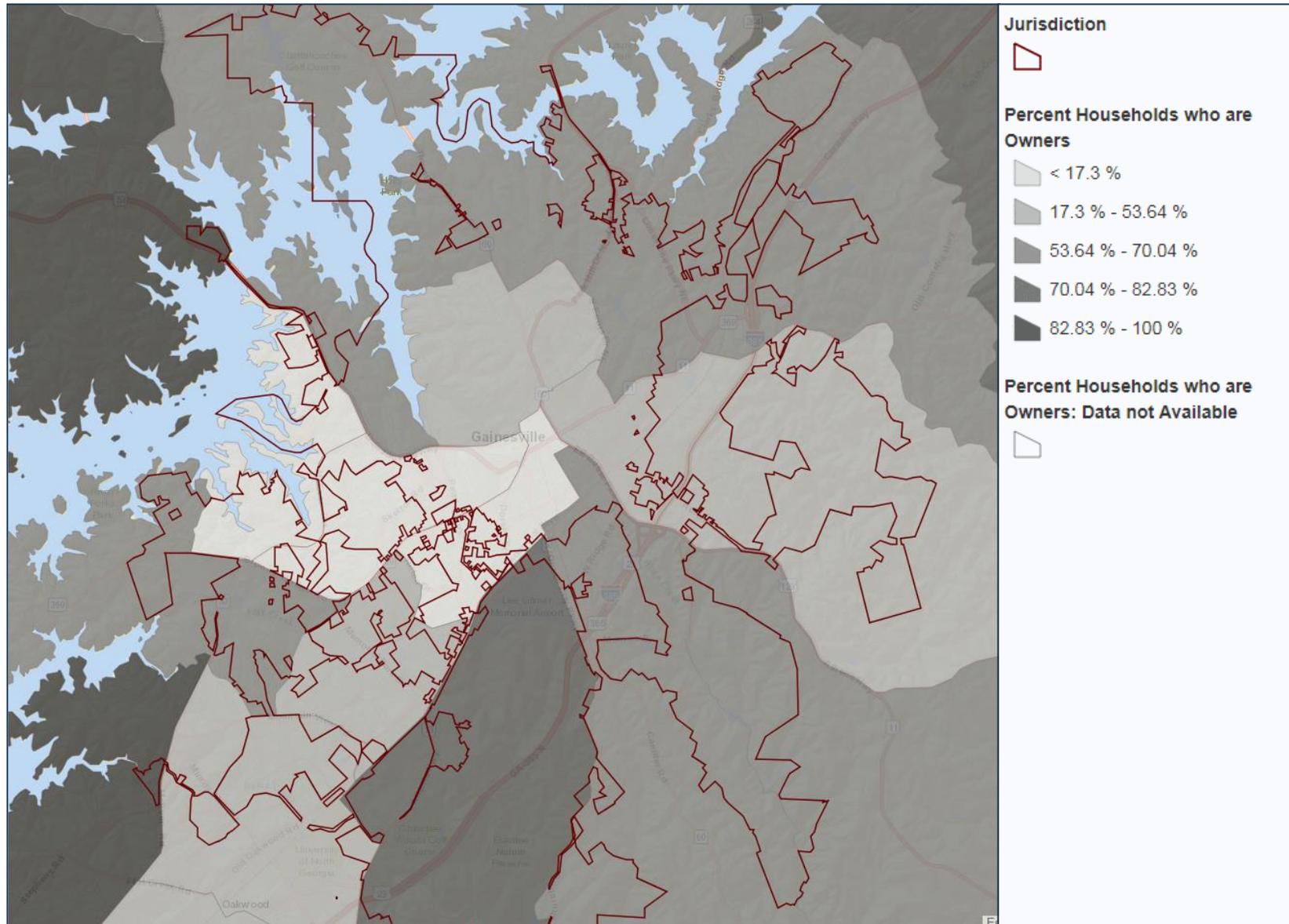
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FIGURE 22 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

FIGURE 23 – SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.²² HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts that are wholly or partially within the city of Gainesville for the years 2013 through 2017, which includes a total of 6,699 home purchase loan application records and 6,322 mortgage refinance application records.²³ Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

Of these applications, 2,188 or about 17%, were denied by the lending institution. There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 36% of home purchase loan denials and 45% of refinance loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.²⁴ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank

²² Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

²³ Includes applications for the purchase or refinance of one-to-four family dwellings in which the property is or will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

²⁴ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. “The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act.” Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

examiners frequently use HMDA data in conjunction with information from loan files to assess an institution's compliance with fair lending laws.

Complete information regarding applicant race, ethnicity, and income is available for 5,891 home purchase loan applications in the study area (88% of the total loan records). Non-Hispanic whites make up the largest group of applicants (65%), followed by Hispanic households (26%), African-Americans (5%), and Asians (3%). The table below shows loan approval rates for completed loan applications by race and ethnicity at various income levels.²⁵ Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

At low incomes, loan denial rates differed noticeably by race and ethnicity, ranging from 13% for white and Latino applicants to over ten points higher for Black and Asian applicants (25% and 23% respectively). At middle incomes, disparities were less pronounced, with all groups showing denial rates around 10% except for African-Americans, who had a denial rate of 17%. At the highest income level, denial rates were again lowest for whites (8%), but significantly higher for African-Americans, Latinos, and Asians (16%, 17%, and 20% respectively). Overall, disregarding income, 10% of white applicants were denied a home loan compared to 15% of applicants of color. African American, Latino, and "other race" applicants had the greatest disparity in lending access, with overall home purchase loan denial rates of around 20%.

The table also provides data for home refinance loan applications. Information regarding race, ethnicity, and income is available for 4,467 refinance applications, or 71% of the total refinance applications in the area. This data also shows some disparity in denial rates by race and ethnicity. White and other race applicants had the lowest denial rates for low and middle income applicants, with African-Americans, Latinos and Asians having significantly higher rates. Among high income applicants, denial rates for other race applicants increase dramatically, and rates for white applicants were significantly lower than those of all other groups. Overall, applicants of color were denied refinance loans at a rate that was significantly higher than that of white applicants (44% versus 28%). Black applicants had the highest overall denial rates, 51%, followed by Latino and Asian applicants (42%).

²⁵ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

TABLE 13 – LOAN APPROVAL RATES BY RACE AND ETHNICITY IN GAINESVILLE CENSUS TRACTS, 2013 – 2017

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	818	95	74	11	806	1,804
	Denial Rate	13.1%	25.3%	23.0%	36.4%	13.0%	14.2%
Middle Income	Completed Applications	831	92	34	10	236	1,203
	Denial Rate	10.1%	17.4%	11.8%	10.0%	8.9%	10.5%
High Income	Completed Applications	1,639	57	46	12	163	1,917
	Denial Rate	8.4%	15.8%	19.6%	8.3%	16.6%	9.5%
All Applicants	Completed Applications	3,288	244	154	33	1,205	4,924
	Denial Rate	10.0%	20.1%	19.5%	18.2%	12.7%	11.5%
Home Refinance Loans							
Low Income	Completed Applications	722	107	41	18	240	1,128
	Denial Rate	38.2%	53.3%	48.8%	33.3%	45.8%	41.6%
Middle Income	Completed Applications	617	54	21	5	98	795
	Denial Rate	28.5%	55.6%	38.1%	20.0%	35.7%	31.4%
High Income	Completed Applications	1,453	66	30	12	57	1,618
	Denial Rate	21.8%	42.4%	36.7%	50.0%	33.3%	23.5%
All Applicants	Completed Applications	2,792	227	92	35	395	3,541
	Denial Rate	27.5%	50.7%	42.4%	37.1%	41.5%	31.1%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The table on the following page identifies reasons for denials by applicant race and ethnicity. Within this data, a reason was provided in about 64% of home purchase loan denials and 53% of refinance loan denials. For purchase loans, debt to income ratio, collateral, and credit history were the most common denial reasons. For refinance loans, these same factors but in a different order of prevalence (credit history, collateral, then debt to income ratio) were the most common reasons for denials regardless of applicant race and ethnicity. While data regarding reasons for loan denials may provide relevant data to help financial counseling agencies better serve first time homebuyers, it does not show strong differences by race and ethnicity.

TABLE 14 – REASONS FOR LOAN DENIAL BY APPLICANT RACE AND ETHNICITY IN GAINESVILLE CENSUS TRACTS, 2013-2017

Reason for Denial	Applicant Race and Ethnicity					All Applicants
	Non-Latino				Latino	
	White	Black	Asian	Other		
Home Purchase Loans						
Denial reason provided	63.3%	61.2%	63.3%	50.0%	67.5%	64.1%
Collateral	17.0%	10.3%	12.0%	0.0%	22.3%	17.5%
Credit application incomplete	14.3%	20.5%	16.0%	0.0%	6.2%	12.6%
Credit history	17.4%	17.9%	4.0%	66.7%	11.5%	15.4%
Debt to income ratio	23.4%	17.9%	28.0%	33.3%	30.8%	25.3%
Employment history	4.2%	2.6%	8.0%	0.0%	4.6%	4.3%
Insufficient cash	2.3%	5.1%	0.0%	0.0%	0.0%	1.7%
Mortgage insurance denied	6.0%	5.1%	4.0%	0.0%	12.3%	7.6%
Other	10.6%	15.4%	16.0%	0.0%	6.9%	10.2%
Unverifiable information	4.9%	5.1%	12.0%	0.0%	5.4%	5.4%
Reason not provided	36.7%	38.8%	36.7%	50.0%	32.5%	35.9%
Total Denials	335	49	30	6	157	577
Home Refinance Loans						
Denial reason provided	49.3%	52.2%	46.3%	21.4%	71.2%	52.6%
Collateral	21.9%	19.7%	20.0%	0.0%	8.4%	18.5%
Credit application incomplete	19.4%	19.7%	15.0%	0.0%	10.8%	17.3%
Credit history	20.2%	23.7%	10.0%	0.0%	26.3%	21.6%
Debt to income ratio	17.1%	9.2%	30.0%	33.3%	22.2%	17.9%
Employment history	0.2%	0.0%	0.0%	0.0%	1.2%	0.4%
Insufficient cash	4.1%	5.3%	5.0%	0.0%	4.8%	4.4%
Mortgage insurance denied	0.4%	0.0%	0.0%	0.0%	0.0%	0.3%
Other	11.2%	14.5%	10.0%	33.3%	18.6%	13.2%
Unverifiable information	5.4%	7.9%	10.0%	33.3%	7.8%	6.4%
Reason not provided	50.7%	47.8%	53.7%	78.6%	28.8%	47.4%
Total Denials	840	134	41	14	191	1,220

Note: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”²⁶ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore how Georgia state law impacts local land use and zoning authority and also how the zoning and land use codes of the City of Gainesville impact housing affordability and fair housing choice within its municipal borders.

Intersection of Local Zoning with Federal and State Enabling Statutes and Fair Housing Laws

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in conjunction with comprehensive plans. Courts have long recognized the power of local governments to control land use, and the Georgia Constitution authorizes all counties and local municipalities to regulate land use and zoning within their respective jurisdictions. This general grant of home-rule authority is limited by four state statutes governing land use and development in Georgia. The Zoning Procedures Law contains the minimum due process procedures and standards—mostly related to notice, advertisement, and a meaningful opportunity to be heard at a public hearing—that a local zoning authority must follow when regulating the uses of property (specifically re-zonings, text amendments, adoption of a zoning ordinances, special use permits, and annexations) within its jurisdiction. If the municipality fails to follow the technical standards, the zoning decision could be invalidated.

Secondly, the Steinberg Act requires jurisdictions that meet a certain population threshold (counties with a population of least 625,000 and municipalities within those counties with a population of 100,000 or more according to U.S. Census data) to consider six criteria in the exercise of zoning power: (1) whether the zoning proposal will permit a use that is suitable in view of the use and development of adjacent and nearby property; (2) whether the zoning proposal will adversely affect the existing use or usability of adjacent or nearby property; (3) whether the property to be affected by the zoning proposal has a reasonable economic use as currently zoned; (4) whether the zoning proposal will result in a use which will or could cause an excessive or burdensome use of existing streets, transportation facilities, utilities, or schools; (5) whether the zoning proposal is in conformity with the policy and intent of the

²⁶ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

adopted land use plan, if any; and (6) whether there are other existing or changing conditions affecting the use and development of the property which give supporting grounds for either approval or disapproval of the zoning proposal. Although Hall County and the City of Gainesville do not meet the population thresholds necessary to make these standards a mandatory part of zoning decisions, Gainesville has incorporated these six standards into its zoning code and requires that these criteria be used for evaluating and determining all requests for re-zonings, zoning amendments, and special use applications.

The Georgia Development Impact Fee Act (DIFA) was enacted in 1990 to establish uniform standards for counties and municipalities that seek to charge new development for a portion of the additional public facilities and infrastructure systems needed to serve that new growth and development. Local governments that want to impose development impact fees must have adopted a Comprehensive Plan that meets the Minimum Standards and Procedures for Local Comprehensive Planning, including a Capital Improvements Element. Gainesville has adopted a development impact fees ordinance to help fund additional public safety and parks and recreation facilities necessitated by the new land developments for which the fees are levied.

Lastly, the Georgia Planning Act of 1989 is an attempt by the state to coordinate planning at the local, regional, and state levels. The Georgia Planning Act ("GPA") authorizes, but does not mandate, local governments to develop and implement their own long-range comprehensive plan to guide growth and development within the jurisdiction, to develop and implement land use regulations consistent with the comprehensive plan, and to establish a capital improvements plan consistent with the comprehensive plan. A local government must maintain classification as a "Qualified Local Government" in order to be eligible for certain state funding and permitting programs. Under authority granted by the GPA, the Department of Community Affairs ("DCA") has established the "minimum planning standards" that must be included in a local comprehensive plan to maintain QLG status. Gainesville updated its 20-year Comprehensive Plan in 2012, which preserves the municipality's Qualified Local Government status. The Unified Land Development Code requires that as part of the review criteria for a proposed subdivision, zoning text amendment, or special use approval, the City must consider whether the proposed change or use is consistent with the Comprehensive Plan. Although the Comprehensive Plan does not have binding legal effect, it should influence the City's decision-making as to whether to grant or deny a zoning proposal.

In the City of Gainesville, the responsibility for implementing the local zoning code and comprehensive plan is given to the Planning Division of the Community Development Department. The Gainesville Planning and Appeals Commission (GPAC) makes recommendations to the City Council on rezonings, annexations, special uses, and code and zoning amendments; road-related items such as namings/renamings/abandonments; and site plan approvals. The GPAC has authority to hear and decide requests for zoning variances and appeals of administrative decisions.

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and

establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.²⁷ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Georgia Fair Housing Act (GFHA), the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. In *Texas Department of Community Affairs v. The Inclusive Communities Project*, a recent landmark disparate impact case under the FHA, the U.S. Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. Besides intentional discrimination and disparate impact, discrimination under the FHA also includes a "refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling."²⁸ This provision has been held by various courts to apply to zoning and land use decisions by local governments.

Despite Georgia state law generally leaving zoning and land use regulations to local decision-making, O.C.G.A. § 8-3-220 explicitly precludes the expansion (or limitation) of fair housing rights by local jurisdictions beyond what is provided for in the state law. The City of Gainesville has not adopted its own specific fair housing ordinance.

City of Gainesville Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

²⁷ Local government power to regulate land use derives from the State's expressly delegated police power, first to municipal governments and then to counties, as found in the various enabling statues of the state constitution and Official Code of Georgia Annotated. See O.C.G.A. § 36-66-1 *et seq.* (zoning authority cities); State law grants local municipalities authority to adopt and enact local comprehensive plans, but such plans are not intended to limit or compromise the right of the governing body of any county or municipality to exercise the power of zoning. See O.C.G.A § 36-70-5.

²⁸ Federal Fair Housing Act § 804(f)(3)(b).

The City’s treatment of these types of issues, mainly through its Unified Land Development Code, are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning and land use ordinances of Gainesville were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the City’s scores for each issue. A complete report including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 15 – ZONING CODE RISK ASSESSMENT

Issue	Risk Score
<p>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	2
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	2

TABLE 15 – ZONING CODE RISK ASSESSMENT (CONTINUED)

Issue	Risk Score
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	2
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?	2
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	2
6a. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?	2
7b. Do multi-family districts restrict development only to low-density housing types?	
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?	1
9b. Is there any provision for monitoring compliance?	
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2
Average Risk Score	1.8

The City’s total average risk score (calculated by taking the average of the 10 individual issue scores) is 1.8, indicating that overall there is moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. Remarkably, the City did not receive a “3/high risk” score on any of the issues reviewed. In many cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. However, in 8 out of 10 of the issues reviewed, Gainesville received a “2/medium risk” score, indicating that the ULDC has the potential to negatively impact fair and affordable housing. These medium-risk scores could

indicate that though the regulations may be facially neutral, the City may be vulnerable to fair housing complaints where the ordinance is applied in a way that disproportionately impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the City's residents and to better fulfill the mandate to affirmatively further fair housing.

Research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the City's codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.²⁹ Exclusionary zoning is understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding. Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential

²⁹ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index* (2007), available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable* (2006), available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability* (2002), available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit*, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

Although these land use regulations may not be in direct violation of fair housing laws, or facially discriminatory, they may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive. Legitimate public objectives, such as maintaining the residential character of established neighborhoods, environmental protection, or public health, must be balanced with housing needs and availability.

Residential uses are permitted within five residential districts and two “nonresidential” / mixed-use districts. The following table illustrates the housing types permitted and pertinent design requirements for the various zoning districts.

TABLE 16 – CITY OF GAINESVILLE RESIDENTIAL AND NON-RESIDENTIAL ZONING DISTRICTS

Residential Zoning Districts					
Building & Site Requirement	R-I-A	R-I	N-C	R-II	R-O
Housing Types Permitted	SF-d	SF-d. Infill-Res	SF-d Infill-Res	SF-d SF-d condo SF-a 2F MF IB	SF-d SF-d condo SF-a 2F MF IB
Maximum density (u/a)	2.18 u/a	2.18 u/a	2.18 u/a	12 u/a	12 u/a
Minimum lot size SF-d	20,000 sq. ft./u	20,000 sq. ft./u* (or 10,000 sq. ft. for IRD)	20,000 sq. ft./u* (or 10,000 sq. ft. for IRD)	7,500 sq. ft./u	10,000 sq. ft./u
Minimum lot size 2F	X	X	X	7,500 sq. ft./u	10,000 sq. ft./u
Min. lot size other permitted uses	20,000 sq. ft./u	20,000 sq. ft./u*	20,000 sq. ft./u*	7,500 sq. ft./u	10,000 sq. ft./u
Max. building lot coverage	20	25	25	35	35
Max. height ft./ stories	50/3	50/3	50/3	60/4	50/3
Setbacks in ft. front/side/rear	40/15/25	30/10/20	30/10/20	30/10/20	30/10/20
Minimum landscape strip required along right-of-ways for any non-single-family residential use (width in feet)	20 ft.	20 ft.	20 ft.	20 ft.	20 ft.

TABLE 16 – CITY OF GAINESVILLE RESIDENTIAL AND NON-RESIDENTIAL ZONING DISTRICTS (CONTINUED)

Nonresidential Zoning Districts					
Building & Site Requirement	O-I	N-B	C-B	R-B	G-B
Housing Types Permitted	IRL/PCH Special Use: SF-d SF-d condo SF-a 2F MF MU Group home	IRL/PCH MU Special Use: SF-d SF-d condo SF-a 2F MF	MF MU Special Use: Group home IRL/PCH	IRL/PCH Special Use: Group home	IRL/PCH Group home
Maximum residential density (u/a)	12 u/a	12 u/a	0.5 floor-area ratio		
Minimum lot size SF-d	15,000 sq. ft.	15,000 sq. ft.			
Minimum lot size 2F	30,000 sq. ft.	30,000 sq. ft.			
Min. lot size all other permitted uses	15,000 sq. ft.	15,000 sq. ft.	None	15,000 sq. ft.	15,000 sq. ft.
Maximum height ft./ stories	60 ft. / 4	60 ft. / 4	120 ft. / 8	75 ft. / 5	

Notes:

SF-d = single family detached
 SF-a = attached (townhouse)
 MF = multifamily

SF-d condo = attached condominium
 2F = two-family attached (duplex)
 Infill-Res = infill residential development project

IB= industrialized building home (wholly or in substantial part made, fabricated, formed, or assembled in manufacturing facilities for installation or assembly on a building site)

IRL/PCH = Institutionalized Residential Living / Personal Care Home for less than 18 residents; encompasses the following uses: assisted living facility, convalescent home, personal care home, intermediate care home, nursing home, and skilled nursing care facility. ULDC § 9-10-5-4.

*Lot size may be reduced in this zoning district to 10,000 sq. ft. within infill residential development projects, subject to the requirements of ULDC § 9-10-12.

The minimum lot size for a single-family detached home is 20,000 sq. ft. in the R-I-A, R-I, and N-C residential districts; 10,000 sq. ft. in the R-O district; 7,500 sq. ft. in the R-II district; and 15,000 sq. ft. in the O-I and N-B “nonresidential” districts. Single family attached (townhomes) and two-family (duplexes) dwellings are permitted by right in the R-II and R-O residential districts and as a special use in the O-I and N-B nonresidential districts. In the R-I and N-C districts, single family lots may be subdivided into “infill residential developments” of 10,000 sq. ft. per unit lots to help accommodate some greater density. However, infill residential developments have additional design and lot requirements, such as: the dwelling type must only be single-family; provide 1,800 sq. ft. minimum livable floor areas; 2-vehicle garage; maximum height of 2 stories; required minimum architectural building materials; and landscaping requirements, which all add additional layers of cost to the opportunity for more housing stock. Taken together, these requirements may unduly limit density to low and moderate density and may impact the feasibility of developing affordable housing throughout the residential districts.

Multifamily is a permitted use in the R-II and R-O residential districts and in the C-B central business district. Multifamily housing requires a special use permit in the O-I and NB office and neighborhood

business districts. (The special use permit process generally requires application review, public notice, public hearings before the planning and appeals board and then the governing body, and compliance with additional criteria.) Mixed-use buildings—used partially for residential use and partially for office, personal service, retail, entertainment or public uses—are a permitted use in the C-B and N-B districts, and a special use in the R-O residential district. Maximum density in these districts is 12 units per acre. Density also is limited by maximum height allowances, which are 3 stories in the R-O district, 4 stories in the R-II, O-I, and N-B districts, and 8 stories in the C-B district. There is little variation in density allowances across the various residential and mixed-use districts, which is typically a moderate density level depending on the jurisdiction, population, and demand. Just looking at the ULDC in isolation, maximum density allowances and other design requirements may impede the development of higher-density multifamily housing, and thus impact the feasibility of developing affordable housing.

Exclusionary zoning can happen on a continuum and there is more the City could do to use zoning and land use policies to further remove artificial barriers to development of and access to affordable housing across all residential zones. For example, the City may want to consider adopting means to allow more flexibility in density and affordable housing development by carving out additional residential zoning districts or subdistricts that allow for a greater mix of housing types, lower minimum lot sizes, and higher multifamily density, and other alternatives such as relaxing the infill residential development standards, providing for cluster developments, density blending, and transfer of development rights in appropriate locations. Permitting or incentivizing conversion of single-family dwellings in high opportunity intown neighborhoods to two-family, 3-family, or multifamily dwellings on large lots also is a strategic way to address the need for more density and infill development in established neighborhoods.

Moreover, the City's land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). Gainesville has not adopted specific development incentives like density bonuses, reduced parking, or design waivers, reduced or waiver of development impact fees, administrative variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes.

All together, these zoning tools could potentially allow for more supply of housing, which helps put downward pressure on rental and sale prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.³⁰

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen

³⁰ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

many states revising their allocation formulas to discourage this pattern in new developments.³¹ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³² This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

SUPPLY AND OCCUPANCY

Publicly-supported housing units in Gainesville are shown in the table below. Taken together, these programs account for 8% of the housing units in Gainesville. However, because the programs are all rent-based, the share of rental units in the area supported in some form by a public subsidy is considerably higher.

TABLE 17 – PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY IN CITY OF GAINESVILLE

Housing Units	Number	Percent
Total housing units	13,029	100.0%
Public housing	494	3.8%
Project-based Section 8	385	3.0%
Other multifamily	74	0.6%
HCV program	93	0.7%
LIHTC program	746	5.7%

Source: HUD's A Picture of Subsidized Households

In the city of Gainesville, 39.4% of households identify as white, yet white households make up only 13.7% of public housing units in the city. The representation of white families in project-based Section 8 units (32.4%) and in the voucher program (38.4%) is approximately even with their general population share, and they are overrepresented in other subsidized multifamily housing types (78.1%). Black households (21.5% of total households) are overrepresented in public housing units (38.1%), project-based Section 8 (62.1%), and the voucher program (57.5%) compared with their shares of the city's population. Hispanic households (34.8% of total population) are significantly underrepresented in project-based Section 8 (4.7%), other subsidized multifamily (2.7%), and the voucher program (4.1%), but overrepresented in public housing (47.9%). Asian households are underrepresented in all public housing programs except for other multifamily, but their share of the population is so small that the differences in this analysis are reflective of just a single household or two.

³¹ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingcr04.pdf.

³² Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 18 – PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE AND ETHNICITY IN CITY OF GAINESVILLE AND HALL COUNTY

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of Gainesville								
Public Housing	49	13.7%	136	38.1%	171	47.9%	1	0.3%
Project-Based Section 8	117	32.4%	224	62.1%	17	4.7%	1	0.3%
Other Family	57	78.1%	12	16.4%	2	2.7%	2	2.7%
HCV Program	28	38.4%	42	57.5%	3	4.1%	0	0.0%
0-30% AMI	5,789	52.4%	1,726	15.6%	3,109	28.2%	329	3.0%
0-50% AMI	860	48.2%	464	26.0%	414	23.2%	25	1.4%
0-80% AMI	1,304	37.7%	909	26.3%	1,059	30.6%	25	0.7%
Total Households	2,199	39.4%	1,199	21.5%	1,944	34.8%	84	1.5%
Hall County								
Public Housing	49	13.7%	136	38.1%	171	47.9%	1	0.3%
Project-Based Section 8	117	32.4%	224	62.1%	17	4.7%	1	0.3%
Other Family	57	78.1%	12	16.4%	2	2.7%	2	2.7%
HCV Program	78	38.4%	116	57.1%	9	4.4%	0	0.0%
0-30% AMI	44,885	73.3%	4,414	7.2%	10,484	17.1%	910	1.5%
0-50% AMI	3,620	63.1%	729	12.7%	1,219	21.3%	65	1.1%
0-80% AMI	6,080	50.5%	1,489	12.4%	3,284	27.3%	95	0.8%
Total Households	12,400	56.5%	2,229	10.2%	5,824	26.5%	340	1.6%

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; HUD’s A Picture of Subsidized Households

The information available for individual developments within the City of Gainesville provides more detail on the general trends in Table 19. Within all six of the listed properties, the share of residents who are African-American is significantly higher than in the total population. In the two public housing properties, the share of Hispanic residents is higher than their share of the general population, but in project-based Section 8 and other multifamily, the share of Hispanic residents is significantly lower than their share of the population. Shares of white residents are lower than their share of the total population in the two public housing properties and in two of the three project-based Section 8 properties and in the other multifamily property. All of the properties except for Lighthouse Manor have shares of Asian residents that are lower than their share of the total population.

TABLE 19 – DEMOGRAPHICS OF PUBLICLY SUPPORTED HOUSING DEVELOPMENTS IN THE CITY OF GAINESVILLE

Development Name	Units (#)	Race and Ethnicity				Households with Children (%)
		White (%)	Black (%)	Hispanic (%)	Asian (%)	
Public Housing						
Melrose Homes	238	16%	36%	48%	N/A	55%
Harrison Square	256	10%	42%	47%	1%	70%
Project-Based Section 8						
Church Street Manor	54	67%	28%	4%	N/A	2%
Linwood Apartments	84	25%	72%	3%	N/A	65%
Ridgecrest Apartments	130	28%	65%	6%	N/A	62%
Other Multifamily						
Lighthouse Manor	74	77%	16%	3%	3%	N/A

Note: Percentages may not add to 100 due to rounding error.

Data Source: A Picture of Subsidized Households

GEOGRAPHY OF SUPPORTED HOUSING

In the map that follows, the locations of publicly supported housing developments are represented along with levels of Housing Choice Voucher use in the city of Gainesville. The map is overlaid with dots representing racial/ethnic demographics.

The blue markers on the maps indicate the locations of public housing. Melrose Homes is the dark blue marker located southwest of downtown and the light blue marker is Harrison Square, with scattered sites. They are both located in areas with an above average percentage of Hispanic residents.

The orange markers on the maps indicate that the locations of Project Based Section 8 units. Two of these, Ridgecrest and Linwood Apartments are located in northern Gainesville in areas with above average African-American populations. The other, Church Street Manor, is located near downtown in an area with an above average percentage of African American and Hispanic population.

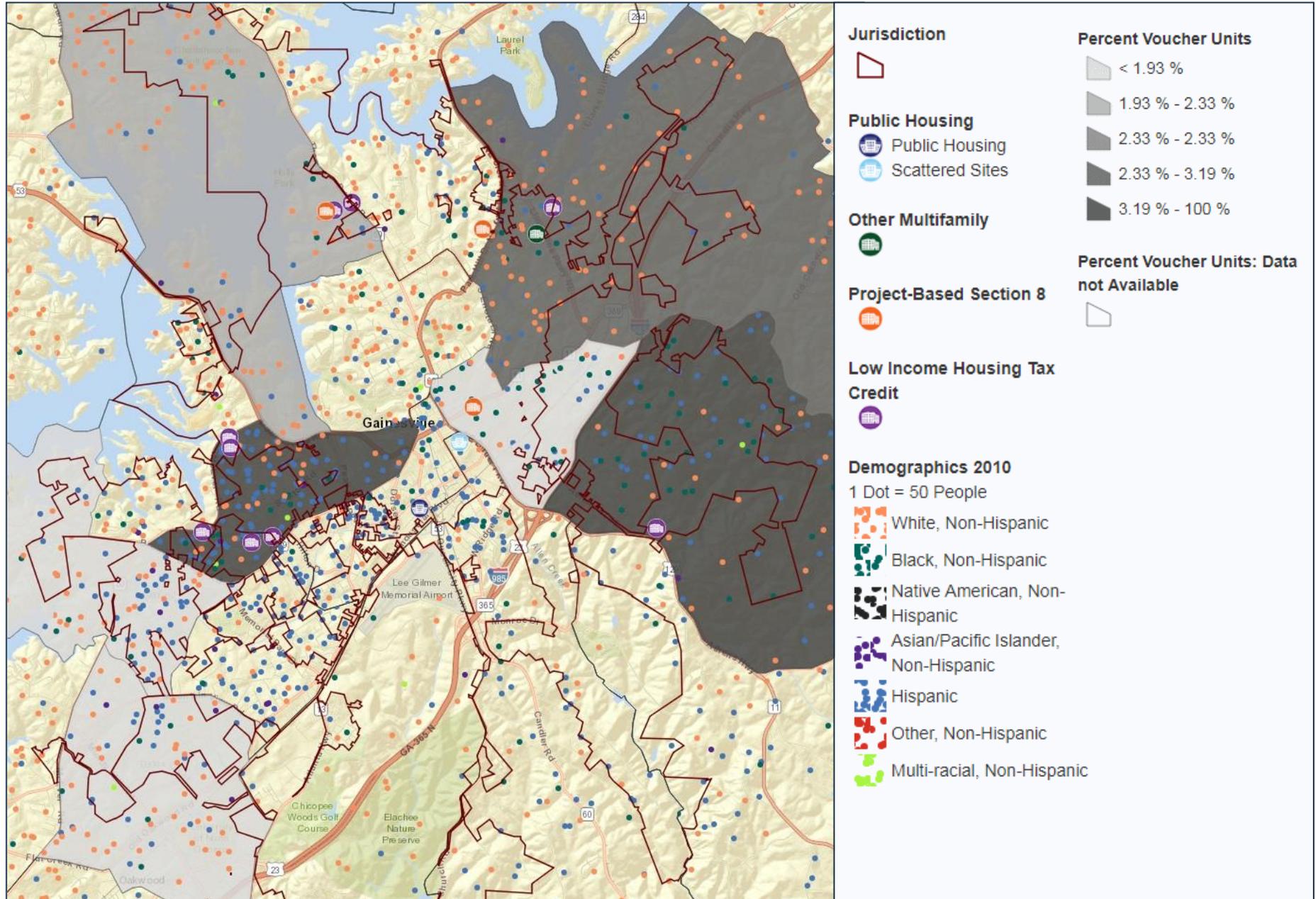
Finally, the maps also depict the locations of Low Income Housing Tax Credit developments. The Low Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. These units are primarily located in a cluster in western Gainesville in an area that is majority Hispanic. Two additional properties are located near other publicly-supported housing in northern Gainesville, and a final one is located in the southeast portion of the city.

The rates at which Housing Choice Vouchers (HCVs) are used are represented by the shading on the maps. HCVs are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate over time. The current maps show that voucher use is highest in western Gainesville where the program accounts for 3.4% of all housing units. The eastern and northeastern portions of the city also have above average voucher usage, though overall voucher use in the city is very low.

When the map of publicly supported housing locations is compared with the maps of opportunity index scores in Chapter 5 of this report, it is clear that different housing locations all carry with them different positive and negative opportunity attributes. Publicly-supported housing in Gainesville is located in areas with fair to poor labor market engagement and above average rates of poverty. However the areas also have reasonable access to proficient schools, good access to transit, and low transportation costs. The more centrally-located properties have better proximity to jobs but poorer air quality.

Evaluating tradeoffs in access to opportunity is an important exercise because it demonstrates that no one neighborhood has all the markers of high opportunity – and neither are high scores on all the opportunity indices likely to be imperative for any one person or household. A family with children may opt for an affordable housing option in a neighborhood with access to better schools, even if it offers lower proximity to jobs and a longer, costlier commute. Conversely, a retiree who is no longer employed and does not have school-aged children may choose a neighborhood with many services nearby over one with good schools or jobs proximity. The relative dispersion of publicly supported housing types throughout Gainesville means that, to the degree housing units in those developments have vacancies and are available for rent, residents have the opportunity to access opportunity factors of particular importance to them.

FIGURE 24 – PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

POLICY REVIEW

As a public housing authority, the Gainesville Housing Authority owns 376 units of public housing distributed primarily between two different properties, with other scattered-site locations as well. The GHA does not administer any Housing Choice Vouchers. As required by HUD, the GHA maintains a comprehensive Five-Year PHA Plan, with annual plan updates, as well as other program-specific policies. The most pertinent of these policies for review in this analysis is the GHA's "Admissions and Continued Occupancy Policy", or ACOP. This document sets policy for who may be housed by the GHA and how those tenant households are selected. Three different aspects of the ACOP are examined here: tenant selection, local preference, and tenant screening. These three policy types all allow some degree of local determination by GHA and are among the most central to matters of fair housing choice.

Public housing is competitive and housing authorities often maintain lengthy waiting lists of potential tenants. For its public housing units, the GHA keeps six different site-specific waiting lists and applicants may apply to any or all of them. While a waiting list is open, an applicant may submit an application which, upon receipt by the GHA, is reviewed and validated. After verification of the applicant's information and determination of any applicable preference criteria, a complete application will be added to the waiting list. Waiting lists may be completely closed or restricted to only certain groups of applicants when the number of wait-listed households exceeds the number GHA expects to reasonably be able to house within a 12-month period. Some application information must be re-verified by GHA immediately prior to an eventual housing placement to ensure household details have not changed in a way that would cause the prospective tenant to be ineligible or unable to claim preferences it originally qualified for.

The process by which applicants are ranked on and selected from a waiting list is guided by a tenant selection policy. Selection of public housing tenants from the GHA's waiting list is determined first by the type and size of unit the family requires, then by any special preference criteria for which the household may qualify, followed by the date and time of the tenant's application. Generally, a "date and time" standard for waiting list selection can be somewhat problematic for disadvantaging applicants who have inflexible, hourly work schedules or transportation and childcare challenges. In the case of the GHA, however, application date and time is more akin to a tie-breaker given the unit size and preference criteria that are applied first.

HUD allows public housing authorities to, within narrow boundaries, set local preferences for the applicants who will be selected from their waiting lists. Local preferences must be constructed carefully to avoid discrimination against protected classes but can be helpful tools to strategically adapt public housing programs to local housing needs and priorities as determined through data-driven planning processes. The GHA applies four categories of preferences which are listed below, in order of priority:

Category 1:

- Working families whose head of household and/or spouse have been working full-time (35 hours/week) for a minimum period of 9 months.
- Applicants whose head of household or spouse are elderly and/or disabled.
- Those who have been involuntarily displaced due to a federally declared disaster.

Category 2:

- Working families whose head of household or spouse is employed at least 15 hours per week.
- Families whose head of household or spouse is enrolled full-time in a secondary education program.
- Victims of domestic violence who have actively participating for 60 days in a residential domestic violence shelter.

Category 3:

- Families whose head of household or spouse is actively participating in a family treatment court including drug/DUI courts, and/or juvenile courts recovery program and mental health services.
- Veterans and veteran's families.
- Households that presently live and/or work in Hall County.
- Youth in foster care that have aged out and are continuing education and job training through DFCS program.

Category 4:

- All other eligible applicants.

Within each of the four preference categories, additional preference is given to Hall County residents and to households that have been displaced due to code enforcement or local redevelopment efforts. Many of these preferences are designed to push toward the top of the waiting list households that are working toward stability through holding full time employment or pursuing secondary education. At the same time, households in particularly vulnerable or precarious housing situations due to displacement from previous housing are also highly ranked. Contained in Category 3, and at the same time a separate criterion for additional preference within each of the four categories, is Hall County residency. Residency preferences such as this, when narrowly tailored to a single specific community, can have the effect of limiting housing choice on a regional basis. Because the GHA's preference is for families who are residents of the county and not just the city of Gainesville, it provides a reasonable basis for mobility of tenant families throughout the area. Hall County families in unincorporated areas who may wish to access opportunities within Gainesville are not prevented from doing so under the current construction of the GHA's residency preference.

Tenant screening, specifically policies regarding criminal background checks, is another aspect of this review. Housing authorities are required to consider an applicant's criminal background as part of their screening process for public housing occupancy but must conduct the screening so as not to violate the prospective tenant's fair housing rights. Recognizing that people of color are disproportionately more likely to have experienced an encounter with the criminal justice system and to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory. Although criminal history is not a protected class, under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. Rather than blanket policies, exclusions of persons with criminal histories must be tailored to the housing provider's legitimate interests, be applied consistently to all applicants, and take into account the type of crime, time since conviction, and other factors.

GHA has made efforts to moderate the influence of criminal background on tenant eligibility, while also supporting the safety of its residents and communities. The GHA conducts criminal background checks on all adult household members named on a public housing application and may deny housing to a family because of drug-related criminal activity, violent criminal activity by family members, and/or registration on the National Sex Offender Registry. Federal regulations govern the barring of public housing admission in some of these cases, but GHA holds discretion in some instances to overlook certain aspects of an applicant's history. For example, documentation of completion of a supervised drug rehabilitation program may have a positive bearing on the outcome of a tenant's application. Furthermore, a family slated to be denied housing for reasons of a criminal background check must be presented with the GHA's findings and be given an opportunity to contest the accuracy of the record.

Finally, while not a policy of the same sort as the others reviewed here, the GHA has pursued specific development strategies that constitute a policy direction of the organization. The GHA has successfully partnered in recent Low Income Housing Tax Credit projects and supports 26 units in one such development with more to come in future developments. The GHA has also applied for permission from HUD to convert 100% of its public housing units to project-based vouchers under the Rental Assistance Demonstration (RAD) program. RAD has been a popular program for many public housing authorities for the flexibility it allows the local Authority in managing and leveraging its real estate portfolio. The numbers of public housing units cannot be diminished, but units can be rehabilitated, redeveloped, or demolished and replaced elsewhere in the GHA's jurisdiction as a result of the conversion. These development priorities have the effect of decreasing the concentrations of public housing, to the degree that they currently exist and diversifying the locations and types of publicly supported housing offered by the GHA.

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the Census Bureau, 19% of the U.S. population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³³

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.³⁴

RESIDENTIAL PATTERNS

In the City of Gainesville, an estimated 3,183 persons 5-years-old or older have a disability, representing 10.7% of the total population. People aged 18-64 have the highest disability rate (5.1%), and the rate for those over 65 is 5.2%. In contrast, just 1.3% of children between the ages of 5 and 17 are disabled. This pattern of disabilities for these three age groups is the same in Hall County.

Ambulatory disabilities are the most common type in the city and county, affecting 6% of each. Cognitive disabilities are the next most common in both areas, followed by independent living. Hearing, self-care, and vision difficulties are the three least common disabilities in the city and county. The map that follows shows the geographic distribution of persons with disabilities throughout the city of Gainesville.

In northeast Gainesville around the Woodlake area, over 10% of the population 65 and holder has a disability. Rates of ambulatory, cognitive, and independent living disabilities are all above average in this tract. In the tract just south, which includes eastern downtown Gainesville as well as part of New Holland, just under 10% of the population aged 18-64 has a disability, and in the tract just southwest,

³³ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

³⁴ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

over 8% of the population in this age group has a disability. Northeast Georgia Medical Center is located in this area and may account for these concentrations of people with disabilities.

Looking at opportunity indicators in the area shows that there are several tradeoffs with the location. Access to proficient schools is average to above average for the city. There is good proximity to jobs but fair to poor labor market engagement. The area has relatively good access to transit but above average poverty. People with many different types of disabilities are limited in their ability to drive, so transit access and walkability tend to be highly attractive opportunity features. Relatively low levels of labor market engagement and high rates of poverty in these areas may make them less attractive for some, but for others, the access to nearby jobs and schools, and possibly the Medical Center, may be important.

TABLE 20 – DISABILITY BY TYPE IN THE CITY OF GAINESVILLE AND HALL COUNTY

Disability Type	City of Gainesville		Hall County	
	#	%	#	%
Hearing difficulty	818	2.7%	4,983	3.0%
Vision difficulty	867	2.9%	3,236	1.9%
Cognitive difficulty	1,441	4.8%	7,286	4.4%
Ambulatory difficulty	1,799	6.0%	10,742	6.5%
Self-care difficulty	784	2.6%	3,756	2.3%
Independent living difficulty	1,238	4.1%	6,890	4.1%

Note: All % represent a share of the total population within the jurisdiction.

Source: ACS

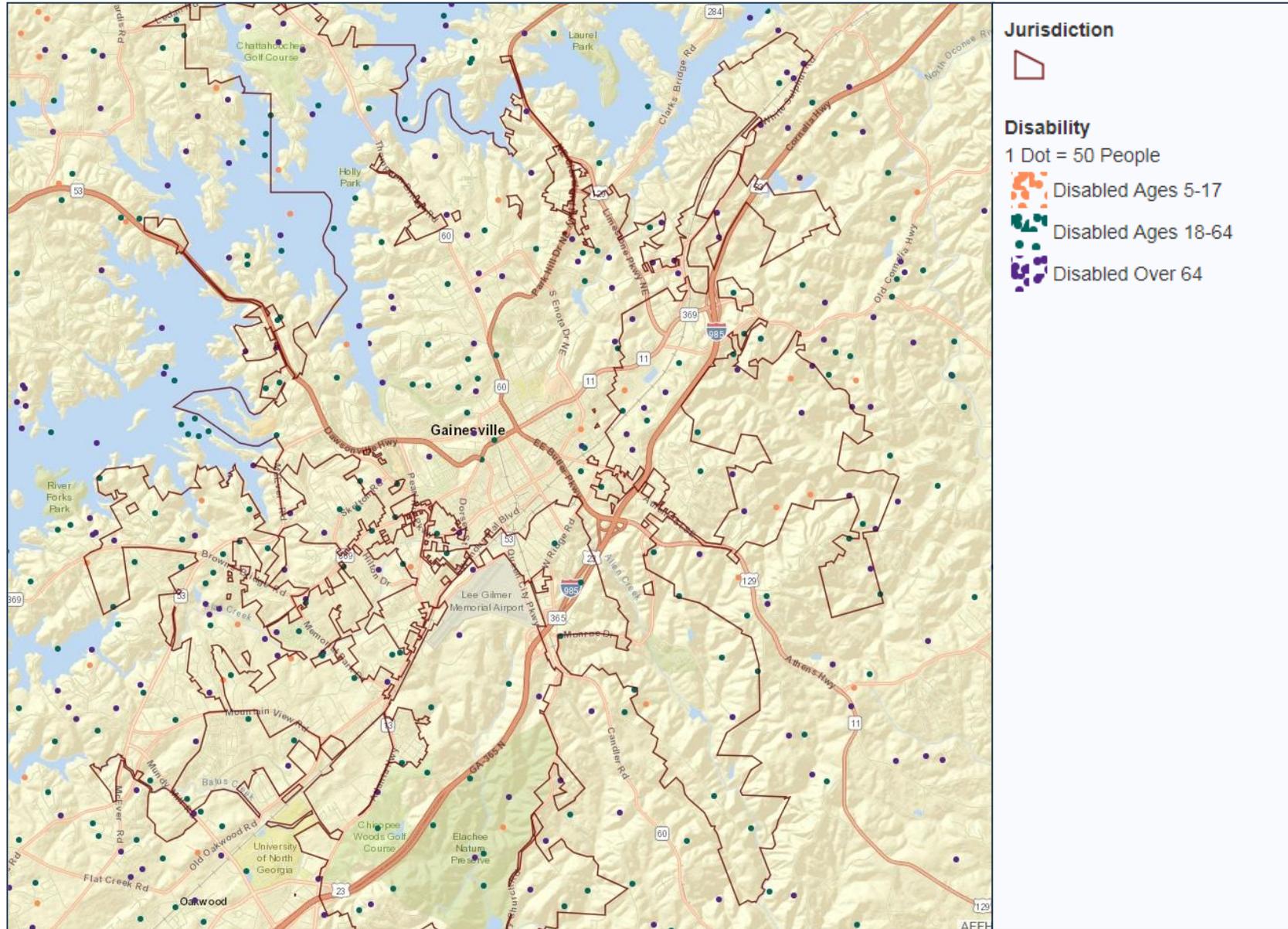
TABLE 21 – DISABILITY BY AGE GROUP IN CITY OF GAINESVILLE AND HALL COUNTY

Age of People with Disabilities	City of Gainesville		Hall County	
	#	%	#	%
Age 5-17 with disabilities	388	1.3%	1,682	1.0%
Age 18-64 with disabilities	1,531	5.1%	9,381	5.6%
Age 65+ with disabilities	1,267	4.2%	7,702	4.6%

Note: All % represent a share of the total population within the jurisdiction.

Source: ACS

FIGURE 25 – PEOPLE WITH A DISABILITY BY AGE IN THE CITY OF GAINESVILLE



Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, <https://egis.hud.gov/affht/>

ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

A search using HUD’s Affordable Apartment Search Tool was conducted to identify affordable rental properties in the city of Gainesville designed to serve people with disabilities. The search returned five results, none of which were designated exclusively for people with disabilities. Three of the listed results were designated as being for elderly households, and two for serving family households. A similar point-in-time search on socialserve.com for affordable apartments currently for rent in the city of Gainesville returned 47 results, 25 of which had some accessible features. Of the 47, 43 had waiting lists.

Based on a standard Supplemental Security Income (SSI) payment of \$771 per month (equating to an affordable rent of \$231 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in the study area, these subsidized housing options are much more likely to contain households with at least one member with a disability than the housing stock in general. The table below shows that persons with disabilities are able to access all types of publicly-supported housing.

TABLE 22 – DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	People with a Disability			
	City of Gainesville		Hall County	
	#	%	#	%
Public Housing	32	8.9%	32	8.9%
Project-Based Section 8	70	19.1%	70	19.1%
Other Multifamily Housing	0	0.0%	0	0.0%
HCV Program	22	25.6%	55	24.9%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

ZONING AND ACCESSIBILITY

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government's affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. Even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all. After all, one priority of the FHAA is to dismantle segregation of protected groups and protect and foster integration. Conditions of Gainesville's zoning code affecting accessibility are assessed in this section. Several elements of the following analysis refer back to the zoning code review presented in Chapter 6.

Definition of "Family" and Group Housing for Persons with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling as a means of preserving the stable, traditional character of their neighborhoods. Unreasonably restrictive definitions may have the unintended consequence (or intended consequence, depending on the motivations behind the drafting of the jurisdiction's definition) of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations. The City of Gainesville defines "family" under its Unified Land Development Code (ULDC) to include "persons related by blood, marriage, adoption or guardianship, or a group of not more than three (3) unrelated persons, occupying a single dwelling unit" (and exclusive of domestic servants). Limiting a family to no more than 3 unrelated individuals is neither the most permissive nor most restrictive under case precedent, but it does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood, marriage, adoption or guardianship and may violate fair housing, privacy, and due process protections if challenged.

More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leave maximum occupancy per dwelling as a matter of safety under housing occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal FHAA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. One option is to amend the ordinance to add an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family.

Accordingly, Gainesville received a “2/medium risk” score on Issue 1 of the zoning code review introduced in chapter 6.

The family definition does not distinguish between or treat persons with disabilities differently because of their disability, rather supportive housing for four or more unrelated persons with disabilities residing together is regulated under the terms “group home” or “institutionalized residential care” facility. The definition of family is facially neutral as all unrelated people—whether persons with disabilities or without—are treated similarly. However, because there is no limit on the number of persons related by blood/marriage/guardianship that may reside together, but there is a limit on the number of unrelated persons who may reside together, application of the family definition may have the effect of disproportionately impacting protected groups by limiting housing choice for unrelated adults with disabilities seeking to live together in a family-like, integrated household. This disparate effect may make the ULDC susceptible to a state due process claim for a functionally-equivalent, though not legally related, family or to an FHA discriminatory effect/disparate impact claim, reasonable accommodation claim, or segregative effect claim.

Housing for persons with disabilities that otherwise meets the definition of “family”, i.e. for 3 or fewer unrelated residents, should be permitted equally with other single-family housing. Under the ULDC, housing for four or more unrelated persons falls under the categories of either a “group home” or an “institutionalized residential care” facility, and siting for this type of housing is more restricted. As amended in 2007, the ULDC defines a group home as: “A single household of four or more unrelated persons, whether or not they are developmentally disabled, and whether or not they are under the supervision of a resident manager.” Group homes are a special use in the R-II and R-O residential districts and expressly prohibited in the R-I-A, R-I, and N-C districts and in the Midtown Overlay district. The code imposes additional regulatory requirements for a home deemed a “group home,” including that the operator hold a valid business registration; a designated agent must be a resident of the county and available 24/7 to be contacted by the City or a complaining neighbor; a resident manager must reside on the licensed premises; the operator must provide a site plan and have available for inspection a list of occupants; and where food is served, the home must comply with all requirements of the Hall County Environmental Health Department. Although the definition of “group home” is facially neutral in that it does not treat differently persons with disabilities from those without, the additional regulatory requirements found in the ULDC for group homes would not likely be applicable to housing for persons without disabilities, i.e. college students living together.

In a 2010 lawsuit against the City of Gainesville (*H & J Consulting Services, LLC v. City of Gainesville*), claiming that the city’s zoning code discriminated against addiction-recovery group home residents, the federal district court for the Northern District of Georgia ruled that the City’s definition of “group home” was not facially unlawful, as the definition did not treat persons with disabilities differently from non-handicapped persons. Liability under a disparate impact theory would require a showing of statistical or comparative evidence or disparate enforcement of the code between recovering addicts/handicapped persons and non-handicapped persons, which the plaintiff in this case failed to provide. Or to prove a reasonable accommodation claim, the plaintiff would have to present evidence as to the necessity of four or more unrelated persons living together to alleviate the effects of their disability, which again the plaintiffs in this case failed to provide. However, the case left open the possibility that with the right

evidence, application or enforcement of the City's treatment of group homes for persons with disabilities (including those recovering from substance abuse and addiction), could make the City vulnerable to litigation and liability.

The ULDC defines "institutionalized residential living and care facility" (IRL) serving 18 persons or less as "an umbrella term that encompasses the following uses: assisted living facility, convalescent home, personal care home, intermediate care home, nursing home, and skilled nursing care facility." Convalescent home, personal care home, etc. are not separately defined but are generally understood to be residential homes with supportive services for persons with disabilities. The definition does not specifically include residential treatment facilities for persons recovering from alcohol/substance abuse, and the code does not otherwise address where such facilities may be sited. Under federal law (e.g. FHAA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug addictions (not current users) or with mental health disabilities, as addiction may be a qualifying disability under federal law. An IRL facility is a special use in the R-II and R-O residential districts and expressly prohibited in the R-I-A, R-I, and N-C districts even if three or fewer residents live there in a family-like setting. The special use, regulatory, and oversight requirements impose additional burdens on housing for persons with disabilities and treat the housing more as institutional uses rather than residential uses even where residents live together in a small, family-like setting. At the very least, the definition of IRL facility should be amended to not include housing for three or fewer residents so that there is no difference between which residential districts this type of supportive housing and similarly situated single-family housing for other unrelated groups may be sited. Otherwise the ULDC may have a segregative or disparate effect on persons with disabilities who need to reside together in supportive, community-based housing. Because of these differences in treatment without clear justification, the City received a "2/medium risk" score on Issue 2 from the zoning code review related to housing for persons with disabilities.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations' impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or "to afford persons with a disability the equal opportunity to use and enjoy a dwelling." However, the FHAA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Gainesville has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Rather, the jurisdiction would appear to rely on the variance process for reasonable accommodation matters with the Planning and Appeals Board holding power to hear and decide applications for variances following the public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities.

The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. Accordingly, Gainesville received a “2/medium risk” score on Issue 3 from the zoning review.

Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHAA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized administrative process.

DRAFT

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING RESOURCES

Georgia has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (the “FHAA”), known as the Georgia Fair Housing Act. Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the FHA. Moreover, O.C.G.A. §8-3-220 prohibits local governments (or “political subdivision[s] of the state”) from adopting fair housing ordinances that extend protected class status to individuals who are not currently protected under the Georgia Fair Housing Act.

Although Georgia’s FHA closely follows the “rights, procedures, remedies, and the availability of judicial review” provided in the FHAA, the state Act is not currently certified by HUD as “substantially equivalent” to the federal FHAA, and therefore no state agency qualifies to participate in nor receive funding through HUD’s Fair Housing Assistance Program (FHAP). The Georgia Commission on Equal Opportunity (GCEO) formerly partnered with HUD as the state enforcement agency under the “substantial equivalence” criteria. However, the GCEO ceased to participate in the FHAP in 2012, though with the appointment of a new Commissioner this year, the agency may resume work to recertify as a FHAP agency.

The GCEO has the authority and responsibility to administer and enforce the Georgia Fair Housing Act and to investigate housing discrimination complaints that it receives under state law. The Georgia Fair Housing Act provides that in any case where HUD has initiated an investigation or an action against a person or organization for alleged discriminatory housing practices, the state may not also pursue an investigation or action against that party for the same alleged discriminatory conduct. The law also provides that wherever a local fair housing law grants rights and remedies which are substantially equivalent to the state law, the GCEO must notify the appropriate local agency of an alleged violation and take no further action if the local enforcement official commences proceedings in the matter. A local agency also may institute a civil action, without the need to first exhaust administrative remedies, if it is unable to obtain voluntary compliance with its local fair housing law.

While the Georgia act permits political subdivisions of the state to adopt local fair housing ordinances consistent with the state’s act, Gainesville has not adopted a local nondiscrimination or fair housing ordinance or established a local commission empowered to receive and resolve fair housing complaints.

Although Georgia lacks a HUD-certified FHAP agency, Metro Fair Housing Services, Inc., a nonprofit fair housing advocacy organization whose service area includes Gainesville, recently was awarded grant funding under HUD’s Fair Housing Initiatives Program (FHIP). Under the FHIP, HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by

discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

For FY 2017, HUD awarded Metro Fair Housing Services, Inc.—located in Atlanta and serving Gainesville, Hall County, and all other metro Atlanta counties—a \$300,000 multiyear grant under the FHIP’s private enforcement initiatives (PEI) grants category. Metro Fair Housing Services has pledged to use its grant award to continue its core fair housing activities in the greater Atlanta Metropolitan Statistical Area; to perform rental, sale, and lending tests based on race, national origin, familial status, and disability; to collaborate with faith-based and community organizations to conduct education events; to assist aggrieved parties in filing bona fide fair housing allegations with HUD; to mediate or conciliate complaints; and to recruit and train new testers; and to sponsor Fair Housing Month events in April.

FAIR HOUSING COMPLAINTS

An individual in Gainesville who believes he or she has been the victim of an illegal housing practice may file a complaint with the Georgia Commission on Equal Opportunity or with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency’s closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because no Georgia state agency is authorized by HUD to administratively enforce and adjudicate federal fair housing complaints, HUD will retain complaints it receives from a Georgia complainant and begin the investigation process.

The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After the FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a final “Determination” report finding either that there is “reasonable cause” to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds “reasonable cause,” HUD must issue a “Charge of Discrimination.” If the FHEO determines that there is no “reasonable cause,” the case is dismissed. The advantages of seeking redress through the administrative complaint process are that HUD takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and also impose civil penalties, but unlike federal district court, may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

However, the aggrieved party or the respondent may elect to have the administrative proceeding terminated and the case instead adjudicated in federal court. The Department of Justice will prosecute the case on behalf of the aggrieved party. Additionally, the DOJ may bring suit on behalf of individuals based on referrals from HUD in the case of a “pattern or practice” of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. An aggrieved party may intervene in any action filed by the DOJ.

The investigation, conciliation, reasonable/no reasonable cause findings, and charge procedures under the Georgia Fair Housing Act are substantially similar to the HUD process, including an administrative hearing with the availability of compensatory and injunctive relief. However, where the matter involves the legality of any state or local zoning or other land use law or ordinance, the GCEO administrator must refer the matter to the Attorney General for appropriate action instead of issuing a charge.

An aggrieved party may bypass the federal and state administrative routes altogether, and instead file a civil action directly in federal district court or state superior court, thus maintaining control of the case and the potential to collect punitive damages. Civil litigation is available without first exhausting administrative remedies unless the parties have already entered a conciliation agreement, or, following a charge of discrimination, an administrative hearing has already commenced.

The advantages of seeking redress through the administrative complaint process are that administrative proceedings are generally more expedited than the federal court trial process, and the enforcement agency takes on the duty, time, and cost of investigating the matter and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

If an individual has evidence that his or her rights under the FHA or state fair housing law have been violated in a final land use or zoning decision, the aggrieved person may file a complaint with the Commission or with HUD, or file a lawsuit directly in state or federal court within the statute of limitations period. (HUD refers matters involving the legality of state or local zoning or other land use law or ordinance to the Department of Justice for further enforcement.)

Complaints Filed with HUD

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Georgia (as well as Alabama, Florida, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee). The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of

housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

The Atlanta Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in the City of Gainesville for the last five-year period.

From January 1, 2014 through December 31, 2018, HUD received 8 formal complaints of alleged housing discrimination occurring within Gainesville. Seven of the reported cases involving perceived or alleged discrimination have been closed; one of the eight cases was still open and under investigation at the time of HUD's response.

More than one basis of discrimination may be cited in a single complaint. Of the 8 complaints received and investigated by HUD, disability was cited as the basis of discrimination in 5 cases; race in 2 cases; familial status in 1 case; and religion in 1 case.

Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory *issue*. Discriminatory terms, conditions, privileges, or services and facilities was an issue cited in 4 cases; failure to make a reasonable accommodation was cited in 4 cases; otherwise deny or make housing unavailable in 2 cases; discrimination in terms/conditions/privileges relating to rental in 2 cases; discrimination in terms/conditions/privileges relating to sale in 1 case; failure to permit reasonable modification in 1 case; false denial or representation of availability in 1 case; discriminatory acts under Section 818 (coercion, etc.) in 1 case; and discriminatory refusal to rent in 1 case.

Of the 7 closed cases, HUD assisted in closing 4 cases through successful conciliation or settlement agreements. Three of those settled with monetary relief to the complainants in amounts ranging from \$100 to \$3,000. One case was withdrawn by complainant after other resolution. Two cases were closed after investigation and a "no cause" determination.

TABLE 23 – CITY OF GAINESVILLE HUD COMPLAINTS, JANUARY 1, 2014 TO DECEMBER 31, 2018

File Date	Closure Date	Basis / Bases	Issues	Closure Reason	Compensation Amount
04/25/14	10/22/14	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation.	Conciliation/ settlement successful	\$2,000.00
11/20/14	3/27/15	Religion	Discriminatory terms, conditions, privileges, or services and facilities.	Complaint withdrawn by complainant after resolution	
11/21/14	2/12/15	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation.	Conciliation/ settlement successful	
2/11/15	1/21/16	Disability	Discrimination in terms/ conditions/ privileges relating to sale; Failure to permit reasonable modification.	No cause determination	
7/23/15	10/27/15	Race	False denial or representation of availability - rental; Discrimination in terms/ conditions/ privileges relating to rental.	Conciliation/ settlement successful	\$100.00
3/22/16	6/24/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation.	Conciliation/ settlement successful	\$3,000.00
6/8/17	10/30/17	Disability	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation.	No cause determination	
9/16/18		Race	Discriminatory refusal to rent; Discrimination in terms/ conditions/ privileges relating to rental.	Open investigation as of 2/20/19	

Source: HUD Region IV

Complaints Filed with the Georgia Equal Opportunity Commission

The Georgia Commission on Equal Opportunity (GCEO) is under the auspices of the Office of the Governor. The GCEO has a Board of Directors made up of attorneys and community leaders statewide. The GCEO has two divisions: the Equal Employment Division and the Fair Housing Division. The mission of the Fair Housing Division is to promote broader housing choices in Georgia; to promote understanding of the Georgia Fair Housing Act and the federal Fair Housing Act; to encourage integrated communities and neighborhoods; to secure compliance with state and federal fair housing laws; to eliminate discrimination; and to punish persons who violate fair housing laws.

The GCEO, which maintains complaint data by counties, reported that it had not received any formal complaints of housing discrimination in Hall County for the period January 1, 2014, through December 1, 2018.

Complaints Filed with the Metro Fair Housing Services, Inc.

Metro Fair Housing Services, Inc., headquartered in Atlanta, uses the FHIP funding it receives to conduct education and outreach, complaint intake and processing, and fair housing testing (systemic and complaint-based) in metro Atlanta areas that include Gainesville and Hall County. Through the most recent multiyear FHIP funding grant, Metro Fair Housing may receive and investigate complaints of alleged housing discrimination, conduct mediation and conciliation efforts; and refer meritorious claims to HUD.

After a request for housing discrimination complaint data regarding housing in Gainesville, Metro Fair Housing responded that it had not received any formal complaints for the requested five-year time period.

FAIR HOUSING LAWSUITS AND LITIGATION

For the recent five-year period—January 1, 2014 through December 31, 2018—two noteworthy lawsuits were filed regarding alleged housing discrimination in Gainesville resulting in federal litigation, an appellate decision by the Georgia court of Appeals, or a HUD Administrative Law Judge decision.

- *Bonds v. Turner*, Civil Action No. 2:15-cv-00192 (N.D. Ga.) (filed Sept. 18, 2015; terminated Jan. 16, 2018).

This federal fair housing lawsuit stems from egregious harassment and threats that the Bonds family—an African-American couple and their two children—endured from their white next-door neighbor while renting a single-family home in Gainesville. From the day the Bonds family moved in and over the course of three years, Defendant Turner repeatedly assaulted them with derogatory and racist slurs, threats with a firearm or other weapon, and other humiliating conduct. During this time, Turner was employed as a sanitation worker in the City of Gainesville’s Solid Waste Department. Plaintiffs alleged that while on his route as a trash collector Turner would enter their driveway yelling racial epithets and making monkey sounds. Plaintiffs complained to the City and requested that he be taken off the family’s

collection route, but from their perspective no action was taken. Eventually, Plaintiffs felt forced to move.

Plaintiffs then sued Turner and the City alleging a violation of the Fair Housing Act's interference provision, which states that "[i]t shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, . . . any right granted or protected by [the sections] of this title." This section rarely has been used in recent years, but was conceived during the Civil Rights era to apply to people who are not necessarily housing providers, such as neighbors motivated by racial animus, and protect against violent actions and intimidation such as cross burnings, physical or verbal attacks, and the like. The complaint alleged that the City was vicariously liable for Turner's actions because he was acting within the course and scope of his employment when he committed many of the discriminatory acts of intimidation, threats, and interference. The city suspended and eventually fired Turner.

As a matter of first impression for the 11th Circuit, the district court ruled that post-acquisition discrimination can be covered by the FHA where discriminatory conduct makes a dwelling unavailable to the owner or tenant to the point of "constructive eviction." However, on motions for summary judgment, the court found that based on the evidence the City was not vicariously liable for its employee's discriminatory actions because Defendant Turner was not authorized to speak on behalf of the City, nor was active engagement with the public among his job duties. On the contrary, the court found that Turner's conduct was "wholly personal to himself" and that he stepped outside of the scope of his employment in these when harassing the Plaintiffs.

The court granted judgment in favor of the City on June 28, 2017 upon the City's Motion for Summary Judgment, allowing Gainesville to recover its litigation costs from the plaintiffs and dismissing the City from the lawsuit effective October 25, 2017. Plaintiff's FHA and tort claims against Defendant Turner remained. However, the Plaintiffs moved to dismiss the remainder of the action against Turner and the case was terminated on January 16, 2018.

- *United States of America v. Rappuhn*, Civil Action No. 2:15-cv-01725 (N.D. Ala) (filed Sept. 30, 2015; consent order and case dismissed March 8, 2016)

The Justice Department brought suit against the owners and developers of 71 multifamily housing complexes in Alabama, Florida, Georgia and Tennessee—including the Wincliff Apartments in Gainesville, GA—with evidence that Defendants' buildings failed to conform to the Fair Housing Act's and the Americans with Disabilities Act's accessibility requirements for persons with disabilities. The complaint alleged Defendants engaged in a pattern or practice of discrimination against persons with disabilities and denied rights to a group of persons because of disability by failing to design and construct covered multifamily dwellings with the features of accessible and adaptive design and construction required by the FHA. The Wincliff Apartments, located at 150 Gabriel Circle in Gainesville, was developed for first occupancy in 2001 using Low-Income Housing Tax Credits and HOME funds, to include eight single-level, six-unit buildings and two single-level, four-unit buildings. It has 56 units, all of which are FHA-covered ground-level units. In all, 2,500 ground floor units were involved in the lawsuit among the 71 locations.

The Defendants denied liability but agreed to a settlement by consent decree and to pay \$300,000 into a settlement fund to compensate any aggrieved persons who may have suffered as a result of the alleged discriminatory housing practices and pay \$50,000 as a civil penalty. As part of the settlement, the companies also agreed to make substantial retrofits to remove accessibility barriers. These corrective actions include replacing excessively sloped portions of sidewalks, installing properly sloped curb walkways to allow persons with disabilities to access units from sidewalks and parking areas, replacing cabinets in bathrooms to provide sufficient room for wheelchair users and removing accessibility barriers in public and common use areas at the complexes.

The agreement also required the defendants to receive training about the FHA and ADA to ensure that all future multifamily housing construction complies with these laws and to provide periodic reports to the Justice Department.

The Court approved the settlement and dismissed the case, retaining jurisdiction over the action and the parties for the purpose of enforcing the terms of the consent order.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

The City of Gainesville last completed an Analysis of Impediments to Fair Housing Choice in 2011. That AI recommended 18 policy initiatives or actions to expand fair access to housing in the city. These include:

1. Sustain and expand fair housing support services provided by Metro Fair Housing with a full-time housing staff person assigned to Gainesville/Hall County.
2. Expand efforts to increase understanding and appreciation of cultural diversity.
3. Vigorously work to retain Low Income Housing Tax Credit units with expiring contracts in the moderate income housing supply.
4. Dispersal of Housing Choice Vouchers outside of minority geographic concentrations should be adopted as an operational goal by the Department of Community Affairs (DCA) and supported by a program to recruit landlords and counsel voucher holders.
5. Extend the analyses of racial disparities in mortgage lending to financial institutions. Include performance in decisions about placement of City of Gainesville funds.
6. Research the dynamics of racial and ethnic change in neighborhood composition.
7. Monitor and adjust the amount of vacant and developable land ones for multifamily housing to insure that sufficient land is developable as of right.
8. Research the impact of the consolidated R-II Single Family/Low Density/Medium Density/High Density zoning category on multifamily rezonings.
9. Raise the upper limit of permissible multifamily housing development to 24 units per acre.

10. Transparently reflect and document the fact that city plan reviews do not assess accessibility or compliance with federal requirements.
11. Institute a program to remediate lead exposure risks focused on residences of young African American children.
12. Construct small scholarship, fellowship, and internship programs to encourage minority youth to follow career paths that diversify institutions and occupations in the real estate industry.
13. Advise real estate trade associations that real estate marketing research revealed illegal, potentially illegal, and racially, ethnically, and religiously insensitive advertisements. Request that the associations incorporate the research into their fair housing programs. Advise print media of the findings of the research.
14. Analyze the number and location of accessory dwellings permitted during the last three to five years.
15. Expand the number of residential zoning districts that permit accessory dwellings to include the primary one family residential areas (R-I, R-I-A, and N-C).
16. Strive for more balanced representation of public boards and commissions.
17. Update geographic indicators for protected classes using the 2010 Census.
18. Consider adopting regulations to make all homes “visitable.”

In several years since completion of the 2011 *Analysis of Impediments to Fair Housing Choice*, the City of Gainesville has used administrative and public service dollars to fund nonprofit agencies to assist with educating the public on fair housing issues and to support agencies which provide intake and assessment of fair housing complaints and report violations. The City also provides information regarding fair housing laws and contact information to report housing discrimination in both English and Spanish. Several of the policy recommendations outlined in the 2011 AI – such as those related to fair housing support services, availability of affordable housing, mortgage lending, and zoning and accessory dwellings – are also reflected in the impediments and recommendations outlined in this 2019 AI.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommendations to address priority contributing factors are provided in Table 24, along with associated activities, goals, timelines, and responsible parties.

Impediment 1: Insufficient Affordable Housing Disproportionately Affects Protected Classes

The most common housing need identified by local residents and other stakeholders was affordability, particularly for low- and moderate-income households. While housing prices in the city of Gainesville are relatively modest in comparison to nearby markets in the metro Atlanta area, these costs are often unattainable for low-wage workers, seniors, and other groups. For example, minimum wage workers in Hall County would need to work 90 hours per week to afford a two-bedroom apartment at the HUD Fair Market Rent of \$847. Stakeholder input suggests that rental units at an \$800 price point are quickly disappearing and that monthly rents of \$1,000 per month or more are becoming increasingly common, putting further pressure on an already limited affordable housing inventory. Data regarding housing problems in Gainesville shows that about 47% of households citywide face an issue with affordability, overcrowding, or substandard housing conditions. While these issues affect a significant percentage of the local population, households of color have a disproportionate exposure to these types of housing problems, in some cases at rates nearly double that of white households.

Compounding the shortage of affordable housing in Gainesville are zoning code provisions that have the effect of adding additional expense to housing construction, thereby making it less affordable. For example, infill residential developments are required to be single-family dwellings with a minimum of 1,800 square feet and a two-car garage meeting specific architectural materials and landscaping requirements. These provisions limit opportunities for housing construction that can be passed on to an eventual buyer or renter at an affordable payment. Other provisions limit the development of certain housing types such as accessory dwelling units and cluster homes that often derive greater affordability from increased density. Accessory dwelling units are limited to a couple residential zoning districts and present density maximums would make cluster developments difficult in many locations.

Impediment 2: Racial Disparities Exist in Access to Homeownership

Many households desire homeownership as a housing option in order to build equity and increase stability. However, homeownership rates and data regarding home mortgage applications indicate that households of color – both in Gainesville and nationally – face greater difficulty purchasing a home than do white households. In Gainesville, about 48% of white households own their homes, compared to 14% of Black households and 18% of Hispanics. African Americans and Hispanics are also less likely to apply for mortgage loans. Hispanic residents make up about 39% of Gainesville’s population but constituted only 25% of home purchase loan applicants from 2013 to 2017; similarly, Black residents constitute 12%

of the population versus 5% of loan applicants. White households, conversely, are overrepresented among loan applicants, making up 65% of applicants and 46% of the population. While not the only factor impacting homeownership rates, differences in home mortgage loan approval rates play a role. Home Mortgage Disclosure Act data shows that Black applicants for a home purchase loan in Gainesville are more likely to be denied than white applicants, a trend that holds overall and at each of the income levels examined in this research. Black loan applicants were twice as likely to be denied a mortgage loan than white applicants with denial rates of 20% and 10%, respectively. Asian applicants also had a 20% denial rate for mortgage loans over the last five years.

Since completion of its last AI, the City of Gainesville, the Gainesville Housing Authority, and their partners in the community have made efforts to improve access to homeownership for residents by offering financial counseling and first-time homebuyer classes coupled with down payment and closing cost assistance using CDBG and other state and federal funds. Lending data indicates a continued need for such efforts, along with outreach to lenders regarding fair access to home purchase and refinance loans, and participation in programs designed to improve lending access for low- and moderate-income households.

Impediment 3: Continued Need for Investment in Neighborhoods and Residents

The City of Gainesville has made neighborhood improvement efforts a priority in recent years, including code enforcement efforts, development of neighborhood planning units, infrastructure improvements, and economic development incentives. However, with limited CDBG and other public funding available, there is continued need for investment in Gainesville's low and moderate income neighborhoods and their residents. When asked what community development activities they would like to see, stakeholders commonly identified sidewalk improvements / expansion, continued code enforcement, more parks and trails, and improved transit connections. Additionally, several stakeholders brought up the need for grocery stores and other neighborhood-serving retail and service businesses in particular parts of the city (specifically in the Westside and Downtown neighborhoods). When asked to assess the availability of community resources throughout Gainesville, grocery stores, roads and sidewalks, and property maintenance were most commonly considered to be provided unevenly.

Opportunity data points to gaps in labor market engagement (a HUD-defined index based on labor force participation, educational attainment, and employment) between white, Black, Asian, and Latino residents in Gainesville, with people of color generally living in areas with lower levels of labor market engagement, including the southern and eastern portions of Gainesville. While there are resources in the community to assist with adult / continuing education and job search assistance, stakeholders noted that residents may not always be aware of these resources or may face barriers related to transportation, childcare, or cost that keep people from beginning or completing such programs.

Impediment 4: Accessible Housing for People with Disabilities is Limited

Stakeholders consulted in the course of this analysis frequently cited a shortage of housing options available for people with disabilities, whether accessible units or housing opportunities paired with supportive services. Searches for accessible rental housing using various internet search tools revealed that nearly all properties with accessible units to serve this population have waiting lists for those units.

In addition to a general lack of available accessible housing units for this population, siting a new group home or institutionalized residential care facility in many parts of Gainesville is challenging due to zoning provisions. These two housing types, which serve people with disabilities, are prohibited from several residential zones and permitted only as a special use in others. In cases where residents in one of these housing types live together in a small, family-like setting and otherwise meet the code's "family" definition, a special use permit imposes an additional burden on households comprised of people with disabilities that is not imposed on other households. Finally, Gainesville's zoning code lacks a reasonable accommodation provision. Such a provision creates a separate administrative process for someone to request accommodation of a disability without the undue burden of following a typical variance process, which is designed for handling special conditions associated with a lot or property rather than for ensuring equal access to housing.

Impediment 5: Additional Fair Housing Education and Enforcement is Needed

A need for ongoing outreach, education, and enforcement regarding fair housing is evident from public input and the results of the community survey. Several stakeholders were able to identify at least one agency or office that serves, in some capacity, as a fair housing resource, including Georgia Legal Services, Metro Fair Housing, and HUD. However, other stakeholders could not identify an agency providing fair housing services in the area and several mentioned that there is a need for more coordinated outreach and education about fair housing rights than the City and other agencies currently provide. When asked about their fair housing knowledge in the survey conducted as part of this research, 80% of respondents report knowing or somewhat knowing their fair housing rights; only 20%, however, would know where to file a fair housing complaint. While the City of Gainesville uses a portion of its CDBG administrative and/or public service dollars on fair housing education each year, continued and expanded fair housing education and enforcement activities would help improve local knowledge amongst residents, city and social service agency staff, and private sector actors about fair housing rights, responsibilities, and resources. Although fair housing materials are currently available in Spanish, a more proactive approach, including working through existing community organizations, is likely needed to make this information available to Gainesville's population with limited English proficiency.

Impediment 6: Community Cohesion Can Be Strengthened

Gainesville is a remarkably diverse community, with no one racial or ethnic group making up a majority of the population. The city's residents are 46% non-Hispanic white, 39% Hispanic, and 12% African American. Despite this diversity, stakeholders often described Gainesville as divided into two spheres, white and Hispanic, that rarely intersect. Cultural and language barriers reinforce some of the separation between these two groups and, while the consensus seems to be that acceptance of the city's growing Latino population is improving, there is still more to be done. Because of cultural and linguistic barriers, Latino residents may not be able to participate fully in civic life and may have difficulty navigating banking, lending, leasing, and insurance processes, including those related to housing. The City should continue working to ensure all its residents are included and should take the lead in local messaging that communicates to residents that the community's diversity is a strength and is valued. Opportunities for social and cultural exchange that facilitate interaction between diverse groups within the community should also be supported.

TABLE 24 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 1: Insufficient Affordable Housing Disproportionately Affects Protected Classes		
Limited new rental housing construction or rental rehabilitation	<ul style="list-style-type: none"> • Continue using CDBG funds to increase and maintain the availability of high-quality, affordable rental and for-sale housing through new construction and rehabilitation. (Ongoing, beginning Program Year (PY) 2019) • Explore opportunities for accessing additional funding for affordable housing, either through Georgia DCA or through formation of a HOME consortium with neighboring jurisdictions. (Annually) • Review the Qualified Allocation Plans issued by Georgia DCA under its Low Income Housing Tax Credit (LIHTC) program to identify local government policies or actions that may positively impact the competitiveness of developers’ applications. For developers proposing LIHTC projects in areas with access to key community resources/opportunity factors or areas experiencing a loss of affordable rental units, work closely with them to increase the competitiveness of their applications through letters of support, provision of data and information, gap financing, and other assistance. (Ongoing, beginning PY 2019) • Consider and adopt zoning code amendments that could increase possibilities for development of affordable housing. <ul style="list-style-type: none"> a. Assemble a workshop consisting of affordable housing developers and municipal planning staff to discuss zoning related barriers to affordable housing development. (PY 2020) b. Draft zoning code amendments to address barriers. (PY 2020) • Adopt zoning amendments. (PY 2020) 	City of Gainesville Partner: Gainesville Housing Authority
Limited supply of affordable housing disproportionately impacts households of color	<ul style="list-style-type: none"> • In the routine monitoring of subrecipient organizations, ensure that affirmative marketing plans are in place, are adhered to, and are effective in promoting affordable housing opportunities to diverse groups of residents, including people of color. (Ongoing, beginning PY 2020) 	City of Gainesville
Impediment 2: Racial Disparities Exist in Access to Homeownership		
Smaller shares of Black and Latino households apply for home mortgage loans compared to white households	<ul style="list-style-type: none"> • Use CDBG or other City funds to support financial/credit counseling and homebuyer education classes that connect graduates with downpayment and closing cost assistance. Continue working with Gainesville Housing Authority to connect families in their Resident Opportunity and Supportive Services (ROSS) program transition to homeownership. (Ongoing, beginning PY 2020) 	City of Gainesville Partner: Gainesville Housing Authority

TABLE 24 – FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 2: Racial Disparities Exist in Access to Homeownership (continued)		
<p>Home purchase loan applications by Black and Asian applicants are more likely to be denied than those by white applicants</p> <p>Home refinance loan applications by Black, Latino, and Asian applicants are more likely to be denied than those by white applicants</p>	<ul style="list-style-type: none"> Review Affirmative Marketing strategies to ensure first-time homebuyer assistance is being marketed to communities of color. Translate marketing and other material into Spanish and work through local organizations to advertise programs to Gainesville’s Spanish-speaking residents. Offer Spanish interpretation at homebuyer classes. (Ongoing, beginning PY 2020) Follow-up with homebuyer education class participants to identify barriers inhibiting home purchases and potential curriculum changes that may address these barriers. (Ongoing, beginning PY 2021) Conduct outreach efforts to local lenders to discuss disparities in homeownership rates and lending access. Explore possibilities to recognize local lending institutions that show a commitment to expanding homeownership, possibly by working with graduates of City-sponsored or other homebuyer education classes. (Ongoing, beginning PY 2020) 	<p>City of Gainesville</p> <p>Partner: Gainesville Housing Authority</p>
Impediment 3: Continued Need for Investments in Neighborhoods and Residents		
<p>Areas of the city are underserved with access to grocery stores and other neighborhood-oriented retail (ex: grocery access in the Westside neighborhood)</p>	<ul style="list-style-type: none"> Continue City and Chamber of Commerce promotion of local Opportunity Zones and other available economic development incentives for the purpose of attracting businesses. (Ongoing, beginning PY 2019) Consider providing economic development support such as infrastructure assistance for new small businesses that fill market niches and create jobs. (Ongoing, beginning PY 2020) 	<p>City of Gainesville</p> <p>Partner: Greater Hall Chamber of Commerce</p>
<p>Continued need for neighborhood cleanup and reinvestment</p>	<ul style="list-style-type: none"> Continue code enforcement efforts and demolition of condemned structures. (Ongoing, beginning PY 2019) Continue looking for infill residential development opportunities, such as by acquiring and redeveloping homes for affordable housing or by making available to non-profit housing providers data about City liens on vacant lots for redevelopment into affordable rental or for-sale homes. (Ongoing, beginning PY 2019) Continue to fund projects that expand or improve sidewalks, parks, trails, and other public facilities in low- and moderate-income census tracts. (Ongoing, beginning PY 2019) 	<p>City of Gainesville</p>
<p>Educational and employment barriers may limit economic opportunities</p>	<ul style="list-style-type: none"> Explore potential opportunities for improved transportation connections between major employers (including those in Hall County), continuing education opportunities, and low- and moderate-income census tracts in Gainesville. (PY 2020) 	<p>City of Gainesville</p>

TABLE 24 – FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 3: Continued Need for Investments in Neighborhoods and Residents (continued)		
	<ul style="list-style-type: none"> • Work with local adult / continuing education providers and job search assistance agencies to better identify barriers their students / clients face. Consider opportunities to use CDBG funding to address potential barriers. (PY 2020) • Consider providing CDBG or other funding for youth education enrichment activities to encourage reading proficiency, high school completion, career and/or college preparation, and other education components identified in United Way’s <i>Community Game Plan</i>. (Ongoing, beginning PY 2020) 	City of Gainesville
Impediment #4: Accessible Housing for People with Disabilities is Limited		
Insufficient accessible housing exists to serve the needs of people with disabilities	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. <ul style="list-style-type: none"> a. When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. (Ongoing, beginning Q2, 2019) b. Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units. (Q4, 2020) • Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. (Q4, 2020) 	City of Gainesville
The City does not have a clear and objective process by which persons with disabilities may request a reasonable accommodation	<ul style="list-style-type: none"> • Consider, draft, and adopt a local code amendment that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. (Q3, 2020) 	City of Gainesville
Siting options for group homes and institutionalized residential care facilities are limited	<ul style="list-style-type: none"> • Consider and adopt zoning code amendments that could increase possibilities for development of housing serving people with disabilities who require supportive services. <ul style="list-style-type: none"> a. Draft zoning code amendments to address barriers to siting these uses in residential districts. (Q2, 2020) • Adopt zoning amendments. (Q3, 2020) 	City of Gainesville

TABLE 24 – FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 5: Additional Fair Housing Education and Enforcement is Needed		
Stakeholder input and survey responses indicate that more fair housing education is needed for the general public and housing industry professionals	<ul style="list-style-type: none"> In-house or through a contracted provider, design and coordinate delivery of a fair housing education program in English and Spanish that reaches members of the public who are most vulnerable to housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. Focus on incorporating fair housing education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups, including organizations that serve Spanish-speaking residents. (Ongoing, beginning PY 2019) Clarify agencies that provide fair housing enforcement and discrimination complaint collection / investigation in Gainesville. Develop a City webpage that provides user-friendly fair housing information, including who to contact to report possible discrimination. (PY 2019) 	City of Gainesville
Some landlords take advantage of renters with limited housing options through discriminatory leasing practices	<ul style="list-style-type: none"> As part of the City’s fair housing education program, develop a curriculum that helps prospective renters recognize discriminatory leasing practices and unfair or illegal lease terms and outlines resources available to assist with landlord/tenant disputes or potential evictions. (Ongoing, beginning PY 2020) Offer a seminar focused on “Landlord Rights and Responsibilities” targeted to private landlords with units in Gainesville and/or Hall County to review fair housing laws and best practices regarding tenant selection, accommodations for people with disabilities, lease terms, and other key topics. (Annually, beginning PY 2020) 	City of Gainesville
Impediment 6: Community Cohesion Can Be Strengthened		
The city’s different racial and ethnic groups have few opportunities to interact, diminishing community cohesion	<ul style="list-style-type: none"> Explore options for a communitywide event or events that encourage interaction among diverse participants in neighborhoods throughout the area. Events centered around food, music, and cultural exchange can be supported and promoted to encourage interaction and increased appreciation for cultural differences among Gainesville residents. (Ongoing, beginning Q3, 2019) 	City of Gainesville

TABLE 24 – FAIR HOUSING GOALS AND ACTIVITIES (CONTINUED)

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 6: Community Cohesion Can Be Strengthened		
<p>The City does not clearly articulate its support of racial and ethnic diversity within its population</p>	<ul style="list-style-type: none"> • Develop and a public relations campaign targeted to Gainesville residents articulating the City’s support for racial and ethnic diversity, underscoring that the Latino community is integral to Gainesville, and that all residents bring value to the community. <ul style="list-style-type: none"> a. Develop an adaptable slide deck and presentation on the subject of the value of diversity and inclusion, highlighting varied ways different population groups contribute to the local community and economy. (Q1, 2020) b. Establish a small “speakers bureau” of designated city staff or other community partners to deliver the presentation to local groups. (Q2, 2020) • Market the presentation and available speakers to community groups such as neighborhood/homeowners’ associations, Rotary and other similar clubs, and associations of Realtors, homebuilders, and lenders. (Ongoing, beginning Q3, 2020) 	<p>City of Gainesville</p> <p>Partners: Hispanic Alliance Greater Hall Chamber of Commerce</p>

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