



JOINT ASSESSMENT OF FAIR HOUSING

January 4, 2018

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I. Executive Summary

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act (the Act), ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin (the protected classes). The Act was amended in 1988 to include familial status and disability as protected classes.

The City of Gainesville, Gainesville Housing Authority (GHA), and Alachua County Housing Authority (ACHA), referred to as “collaborating participants” or “participants”, receive federal funds from the United States Department of Housing and Urban Development’s and are required to complete an Assessment of Fair Housing (AFH) to ensure that HUD-funded programs are being administered in a manner that furthers fair housing for protected classes.

Alachua County is a charter county and political subdivision of the State of Florida and through its Board of County Commissioners, and though not a consolidated plan participant or a public housing authority, has opted to be included as a collaborating participant for the Joint Assessment of Fair Housing.

Methodology

The preparation of this AFH included identifying strengths and weaknesses in fair housing practices and recommending courses of action to improve upon deficiencies identified in the study. The analysis included a review of fair housing issues in the jurisdiction including segregation/integration; racially or ethnically concentrated areas of poverty (RECAPs); disparities in access to opportunity; disproportionate housing needs; publicly supported housing; disability and access; and fair housing enforcement. Extensive engagement with community residents and local stakeholders was also an important component of the analysis.

This joint AFH was prepared in accordance with HUD’s Assessment of Fair Housing Tool and related regulations. As a non-entitlement, the HUD data and mapping tool does not provide data specific to Alachua County. Analysis for Alachua County is included as regional data, referred to in this assessment as Alachua County – Gainesville CBSA.

Community Participation Summary

Participants collaborated in conducting a comprehensive community participation process to engage residents and stakeholders throughout the region. Efforts targeted residents, realtors, lenders, landlords, housing providers, social service agencies, and other stakeholders relevant to fair housing issues.

Fair Housing Survey – A survey was designed to collect input from a broad spectrum of the community and received responses from residents and stakeholders across the study area. The on-line survey contained a total of 100 questions and allowed for skip-logic. The survey gathered information related to fair housing including knowledge of fair housing rights; discrimination complaints; whether or not housing choices are limited, affordable, or segregated; access to fair housing education; and demographic data. In all, there were 276 responses to this survey received over a 51-day period, from June 29, 2017 to August 18, 2017. The link to the online survey was distributed through an email distribution list,

advertised at community meetings, and posted on the participant's official websites and social media accounts.

Public/Community Meetings – Participants facilitated three (3) public meetings for City of Gainesville and Alachua County residents and stakeholders and each PHA participant held one (1) community meeting for public housing residents, housing choice voucher holders, and resident advisory board members. Meetings were held in order to provide forums for residents and stakeholders of the study area and other interested parties to contribute to the identification of problems, issues, and barriers to fair housing for this AFH. Meeting dates, times, and locations are listed below. Meetings were held in the evenings in various locations across the region, providing a variety of options for residents to attend. These meetings were advertised via public notice, flyers, and emails distributed by participants. Comments received are compiled into a list of priorities needs as detailed in the Community Participation section of this AFH.

Stakeholder Interviews – Key community stakeholders were identified, contacted, and interviewed as part of the consultation process. Stakeholders were also directly invited to attend the public and community meetings.

Fair Housing Analysis Summary

Participants conducted a thorough analysis of fair housing issues, at the jurisdictional and regional levels, utilizing data calculated by HUD and local data when available. Numerical data is primarily derived at through a formula calculation determined by HUD which pre-populates the tables in this document. HUD maps of the region provided further analysis for the purpose of this document. Maps are also developed and pre-populated by HUD. Absolute numbers are presented in further detail in the HUD tables found in the Fair Housing Analysis section of this document. The following is a summary of some key points derived from the analysis of the HUD provided data and local knowledge.

Demographics

- As of 2016 the population was 128,611.
- Population was projected to grow 53.40% from 2016 to 2020.
- The City of Gainesville has a large student population due to the abundance of local colleges and universities.
- Between 1990 and 2010 the population increased by 25.84% primarily due to the annexation of significant land areas into the City of Gainesville.
- All race/ethnicity groups increased in population with Native American/Pacific Islander growing at the greatest rate.

Alachua County – Gainesville CBSA

- As of 2016 the population was 273,909.
- Population was projected to grow by 3.32% from 2016 to 2020.

- Between 1990 and 2010 the population increased by 37.99%.
- All race/ethnicity groups increased in population with African Americans growing at the greatest rate.

Segregation/Integration

City of Gainesville

- Comparison shows a low degree of segregation between the Whites race/ethnicity and minorities, however, segregation is present.
- The African American race/ethnicity experiences the highest level of segregation.
- There is a high concentration of the African American race/ethnicity in the East Gainesville target area.
- Residential living patterns show that segregated/integrated areas have remained constant from 1990 to 2010 (HUD Maps).
- Owner-occupied housing is primarily located in the northern portion of the city and in west Gainesville.
- Renter-occupied housing is primarily located in the southern portion of the city, which has a high student population.

Alachua County – Gainesville CBSA

- Segregation between non-White/White individuals is slightly higher in the region than in the City of Gainesville.
- The African American race/ethnicity experiences the highest level of segregation.
- Residential living patterns show that segregation in the region increased between 1990 and 2010.
- The homeownership rate in the region is much higher than the rental rate.

Racially and Ethnically Concentrated Areas of Poverty (RECAPs)

This report analyzes data specific to the census tracts and boundaries identified below, and all assessments, conclusions, and goals associated with these R/ECAPs and target areas are specific to the boundaries of the census tracts.

City of Gainesville

- Two RECAPs have been identified for the City of Gainesville:
 - Waldo Road Corridor – located in the NE section of the City and is comprised of census tract 19.02. This R/ECAP is bounded on the north by NE 53rd Ave., on the south primarily by NE 39th Ave. with a portion extending to NE 16th Ave., on the west by NW

13th St. and the railroad tracks, and on the east by NE 39th Blvd. This R/ECAP includes two small unincorporated areas: an area east of the Ironwood Golf Course, south of NE 53rd Ave. and an area southeast of the Gainesville Regional Airport, north of NE 39th Ave.

- SW Student Housing Corridor - a grouping of three census tracts (15.15, 15.17, and 15.19). This R/ECAP is bounded on the north by Archer Rd., on the south by Williston Rd., on the west by I-75, and on the east by SW 23rd Terrace.
- East Gainesville has been identified as an area of concentrated poverty and is an additional target area for this assessment:
 - East Gainesville – includes portions of three census tracts (5, 6, and 7), and for the purposes of this document, is bounded on the north by NE 15th Ave., on the south by SE 41st Ave., on the west by Main Street, and on the east by SE 43rd St.
- 41.58% of residents in RECAPs are African American compared to 22.39% of residents in the city as whole.

Alachua County – Gainesville CBSA

- One RECAP has been identified for Alachua County – Gainesville CBSA:
 - Tower Rd./I-75 Corridor – bounded on the north by Newberry Rd., on the south by SW 8th Ave. and at the furthest point south by SW 20th Ave., on the west by 75th Street (also known as Tower Rd.) and on the east by I-75.
- 71% of residents in this RECAP are African American.

Disparities in Access to Opportunity

City of Gainesville

- The Asian/Pacific Islander race/ethnicity has the greatest access to quality schools.
- School proficiency is lower in the East Gainesville target area.
- The African American race/ethnicity experiences the least access to the labor market.
- There is a marginal difference in job proximity for all race/ethnicities.
- The African American race/ethnicity has the lowest index for transit trips.
- There is a lack of reliable transportation for all race/ethnicities.
- The African American race/ethnicity has a greater exposure to high poverty neighborhoods.
- The Hispanic race/ethnicity is the least likely to experience living in environmentally healthy neighborhoods.

Alachua County – Gainesville CBSA

- Whites and Asian/Pacific Islanders has the greatest access to quality schools.
- The African American race/ethnicity experiences the least access to the labor market.
- The county/region experiences greater equality of job proximity than the city.
- The Native American race/ethnicity has the lowest index for transit trips.
- There is a lack of reliable transportation for all race/ethnicities.
- The African American race/ethnicity has a greater exposure to high poverty neighborhoods.

Disproportionate Housing Needs

City of Gainesville

- The Hispanic and African American race/ethnicities experience a higher rate of housing problems.
- Housing burden is greatest in the East Gainesville target area.
- The White race/ethnicity experiences homeownership at disproportionately greater rates compared to other race/ethnicities.

Alachua County – Gainesville CBSA

- Approximately 40% of total households in the region experience at least one housing problem.
- Housing burden is greatest in the Tower Road/I-75 Corridor RECAP.
- The White race/ethnicity experiences homeownership at disproportionately greater rates compared to other race/ethnicities.

Publicly Supported Housing (City and County)

- The majority of publicly supported housing for the City of Gainesville is located in the East Gainesville target area and Waldo Road Corridor RECAP.
- The majority of publicly supported housing for Alachua County is located in the SW Student Housing Corridor and Tower Road/I-75 Corridor RECAPs.
- African American represents the dominant race/ethnicity residing in all categories of publicly supported housing in both the city and county.

Disability and Access (City and County)

- There are no significant areas of concentration identified for persons with disabilities.
- There is a lack of affordable accessible housing.

- Much of the housing for persons with disabilities is group homes, perpetuating segregation trends.
- Supportive services are limited, especially within the county.
- There is a lack of access to transportation for persons with disabilities.

Fair Housing Enforcement (City and County)

- There are no unresolved cases of fair housing discrimination in the city or county.
- There are limited organizations providing fair housing services.
- There are three primary agencies/organizations providing fair housing services:
 - Gainesville Equal Opportunity Office.
 - Alachua County Equal Opportunity Office.
 - Three Rivers Legal Services

Contributing Factors

Contributing Factor	Related Fair Housing Issue	Priority Level
Displacement of residents due to economic pressures	Segregation/Integration R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Low
Discussion: Gentrification is a concern in Gainesville, and as the redevelopment of certain neighborhoods in East Gainesville materialize, residents have expressed concern about rising rents, pricing out lower-income households. While some gentrification may be occurring, census data shows that median contract rent in Gainesville has remained relatively steady over the last 10 years and has been decreasing since 2012. Displacement of residents due to economic pressures is a low priority because, while gentrification can lead to displacement of minorities to areas of concentrated poverty and less access to opportunity, the need to address the concentrated poverty that current exists in East Gainesville through strategies such as coordinated public and private investment and addressing social and economic disparities, must occur first in order to improve conditions and reduce disparities in access to opportunity. The City, County, and its partners will however continue to plan and implement revitalization projects that include residents of these neighborhoods as stakeholders and seek to mitigate displacement, making this contributing factor a low priority.		

Lack of private investments in specific neighborhoods	Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
Discussion: <p>East Gainesville is a high poverty area that is predominantly occupied by racial and ethnic minorities. Like most R/ECAPs and segregated areas, East Gainesville lacks access to transportation, high performing schools, businesses, jobs, and services. The area is known for older, low-density residential housing units, a concentration of publicly supported housing, high crime levels, and abandoned and dilapidated structures.</p> <p>Over the years, the City of Gainesville and the CRA has invested federal, state, and local public funds in East Gainesville to attract economic development and spur growth in the area. In addition, some private investment has been occurring in East Gainesville in projects supported by UF as well as other public-private partnerships however, private investment is difficult to attract to areas like East Gainesville and the level of private investment that is occurring is not enough to change the state of housing, improve the economy, and increase opportunities in the area.</p> <p>The lack of private investment is a high priority because public resources are limited and have dwindled over the years and involvement from the private sector is key to transforming East Gainesville into an area of opportunity. The City will need to engage in strategic planning that targets investments in a coordinated manner and that involves financial institutions, non-profits, developers, corporations, and other interested groups in order to maximize the impact on the area. Long term commitment from the public, private, and non-profit sectors is needed to bring about change to East Gainesville and similar neighborhoods, making this contributing factor a high priority.</p>		
Land use and zoning laws	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
Discussion: <p>Barriers to affordable housing, including government regulations and public policies, can limit housing choice and perpetuate segregation and other fair housing issues because land use laws determine where housing is built, the type of housing built, and the cost of housing. Although neither the City of Gainesville's or Alachua County's zoning ordinances intentionally excludes or discriminates against individuals protected by the fair housing law, there are current policies that increase the cost of developing affordable housing or dis-incentivizes the development of lower income housing in high opportunity areas.</p>		

The City and the County have incentives and policies that encourage the development of affordable housing. For example, affordable housing projects do not undergo special hearings if they are in full compliance with the zoning ordinance and other development regulations, accessory dwelling units are permitted as a right in single-family residential zones, in 2017 the County adopted cottage neighborhoods policies to provide for infill developments with higher density, the County has substantially eliminated minimum lot size requirements and reduced setbacks within residential zoning districts, and several incentives are provided to developers of affordable housing including expedited permitting and approvals, the reduction of parking and setback requirements, density bonuses. As of October 1, 2017, Alachua County established half-priced building permit fees for existing homesteads valued at less than \$50,000 and half-priced development review fees for new development projects on the eastside of the unincorporated Urban Cluster (designated in the County's Comprehensive Plan). However, these incentives need to be more widely promoted and developers educated on the incentives for them to be effective.

There are however some government regulations that directly increase costs to builders and developers. Impact and connection fees increase the cost of construction of a new single-family home by as much as 10% or more according to local developers. Alachua County has an authorized Impact Fee Assistance Program that subsidizes/pays impact fees for affordable housing from the County's general budget. The County discontinued the program due to underutilization after the housing bubble bust when new housing construction declined and the program has not been funded in several years due to funding constraints. The City of Gainesville also provided a water/sewer connection fee reduction program however in 2016, the City altered the ConnectFree program to allow eligible property owners in the GRU service area that have well water and sewer tank systems to switch to City water and sewer. Priority is given to low-income households and properties located in low-income areas. Currently, neither the City of Gainesville nor Alachua County reduces or waives impact fees impact fees to developers.

Neither the City nor the County has adopted an inclusionary zoning policy that would promote the inclusion of lower-income housing on the west side of the City and de-concentrate affordable housing in East Gainesville.

Policies or practices that promote the production of affordable housing or that encourages mixed-income communities in high opportunity neighborhoods benefits all residents in the jurisdiction and region because of access to good schools, housing near jobs and transit, and more diverse communities overall, making this contributing factor a high priority.

Location and type of affordable housing	Segregation/Integration R/ECAPS Disparities in Access to Opportunity	High
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Discussion:

There are concentrations of publicly supported housing including public housing, housing choice voucher units, project-based Section 8, and LIHTC projects in East Gainesville as well as in the Waldo Road Corridor, the SW Student Corridor, and Tower Road/I-75 Corridor R/ECAPs.

The location of much of the assisted housing in R/ECAPs and segregated areas limits fair housing choice and access to opportunity for individuals who are members of protected classes because they are disproportionately lower income persons or households that need affordable housing, making this contributing factor a high priority.

Other – Income and education disparities	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
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Discussion:

There are historically segregated areas in the City and the region however, the overall level of racial segregation between non-white/White individuals is low in both the City and the region indicating that the continued pattern of segregation can be attributed to a rise in economic segregation.

Income and education disparities refers to gaps in education, income, and wealth along racial lines stemming from generational poverty. When households are segregated by income, it affects every aspect of their lives including access to transportation, good schools, and employment opportunities. Housing choice is also restricted because of unaffordability. According to the 2015 ACS, the median household income by race/ethnicity in Gainesville is as follows: White alone, not Hispanic - \$40,012; African American - \$24,349, and Hispanic - \$23,027. The median contract rent was \$688 and the median home value was \$141,500. Based on industry standard of affordability, earning three times the cost of the housing, households in Gainesville would need to earn \$27,520 to afford the median contract rent and \$47,167 to afford the median home value. The analysis shows that there is a shortage of affordable housing and the majority of the publicly supported housing is located in East Gainesville which has resulted in a concentration of lower income households, majority of whom are minorities, thus resulting in R/ECAPs.

Regarding education, the school proficiency index shows that African Americans continue to experience inequality in access to education especially in East Gainesville. If not addressed, educational disparities will make it harder for individuals and families to escape poverty.

Rising economic segregation will lead to a growing number of low-income households residing in disadvantaged neighborhoods where they face challenges like inadequate access to services and jobs, poor performing schools, lack of quality housing, and unreliable transit. Addressing disparities in educational attainment will improve job opportunities and provide stability for families, while allowing them to become financially independent thus increasing housing options, making this contributing factor a high priority.

Deteriorated and abandoned properties	R/ECAPS	High
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Discussion:

Substandard housing is prevalent in specific neighborhoods within the City and there is especially a shortage of affordable housing in good condition. An indicator of blight and abandonment in a community is the percentage of residential properties built before 1970. According to 2015 ACS data, approximately 21% of housing units in Alachua County and 27% of housing units in Gainesville were built before 1970. However, in East Gainesville (census tracts 5, 6, and 7) over 54% of the housing units were constructed before 1970. Plan East Gainesville, also indicated that approximately 10% of the neighborhoods east of Waldo Road were abandoned, dilapidated, or boarded-up. Other indicators of blight and abandonment include percentage of residential properties with code

violations, percentage of homes with delinquent taxes, and number of completed mortgage foreclosures.

The presence of dilapidated properties in a particular neighborhood drives down property values and the ability to accumulate equity for homeowners including those with protected characteristics. The presence of deteriorated and abandoned properties also discourages private investment, making this contributing factor a high priority.

Lack of public investment in specific neighborhoods	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
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Discussion:

The City of Gainesville is divided along racial and economic lines and the areas of segregation and concentrated poverty require significant investments in order to transform them into areas of opportunity. In regard to place-based investment strategies, the City and the CRA has committed and expended a significant amount of funding in East Gainesville and has also been successful in attracting some private investment. However, there are concerns of disparities in the provision of services and amenities including the provision of quality housing, parks and recreational facilities, infrastructure (streets) and services including schools, transportation, and economic development programs.

There is a need for increased public investment that is strategically targeted in the R/ECAPs to attract more private investment as well as policy changes that incentivizes investment in these neighborhoods in order to stop the decline, making this contributing factor a high priority.

Availability of affordable units in a range of sizes	Disproportionate Housing Needs	High
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Discussion:

There is a shortage of affordable housing in Gainesville and in the region. In Gainesville over 45% of the population is experiencing a housing problem and 26% of the population is severely cost burdened. Individuals with protected characteristics are disproportionately low- and moderate-income (LMI) and 70% of the LMI households in Gainesville are cost burdened including 46% experiencing severe cost burden. In the region, 39% of the overall population has a housing problem and 20% are severely cost burdened. Additionally, renters are experiencing housing cost burden at a greater rate than homeowners.

Regarding the need for affordable housing in a range of sizes, non-family households (one person living alone or two or more persons who share a dwelling but do not constitute a family) and large families (more than 5 members) experience higher rates of housing problems than small family households. Non-family households In Gainesville are twice as likely to be severely cost burdened than both small and large family households, a fact that is also similar in the region.

In addition to the overall shortage of affordable housing, low- and moderate-income persons, persons with disabilities, families with children, and persons with other protected characteristics that rely on affordable or publicly assisted housing have limited affordable housing choices in integrated areas or areas of opportunity.

The ability for persons to choose where they live is dependent on having realistic housing options that meet the financial needs as well as the health and safety needs of the households and are located in areas with access to opportunity, making this contributing factor a high priority.

Lack of community revitalization strategies

**Segregation/Integration
R/ECAPs**

High

Discussion:

There are segregated areas in the City and R/ECAPs in both the City and the region that lack private and public investment, where there are disparities in the provisions of services and amenities, and where there is a significant lack of access to opportunities.

The City utilizes the majority of its CDBG and HOME funding in low- and moderate-income neighborhoods that overlap with the CRA target areas and the R/ECAP areas however the funds are committed to specific projects that are often times standalone projects that are not part of a comprehensive community revitalization effort.

In order to have a transformative impact on these areas, the City, Alachua County, GHA, ACHA, and the private sector partners will all need to work together to develop a realistic revitalization plan that strategically targets funding and that will help to attract additional private resources. This will result in integration and better access to opportunities in the R/ECAPs in the long run, making this contributing factor a high priority.

Location of proficient schools and school assignment policies

**Disparities in Access to
Opportunity**

High

Discussion:

There are significant disparities in educational outcomes by race/ethnicity, with African Americans suffering the worst on access to proficient schools. East Gainesville schools suffer from low public perception of facility conditions, under crowding, and education quality. Reactive approaches to infrastructure and facility plans lead to disproportionate investment in high-population growth areas in West Gainesville and neighboring County communities. This results in a self-reinforcing cycle where school investment encourages population growth, leading to further investment in high-growth neighborhoods. East Gainesville and neighboring county communities suffer as a result, making this contributing factor a high priority.

Location of employers

**Disparities in Access to
Opportunity**

High

Discussion:

Significant disparities in access to strong labor markets and job proximity by race/ethnicity are present in the City and County. This is due, in part, to the spatial concentration of job opportunities in West and Southwest Gainesville (census tracts along West University Ave and SW Archer Road, for instance) and neighboring county tracts (according to the HUD Job Proximity Index), while low-income families and a disproportionate number of African American families live in East Gainesville and neighboring County communities. This general pattern of commercial activity in the West and generational living patterns in eastern portions of the study area contributes

to disparities in access to quality jobs, making this contributing factor a high priority.		
Availability, type, frequency, and reliability of public transportation	Disparities in Access to Opportunity	High
Discussion: <p>There is a lack of frequent and reliable public transportation in most areas of Alachua County, including areas to the East of Gainesville where many low-income and protected class residents live. Further exacerbating the challenges of relying on public transportation for daily use, areas in Northwest and West Gainesville, and in the County just outside the City boundary, are areas with the highest number of job opportunities. This relationship between strong job centers to the West with a disproportionate concentration of protected class members in East Gainesville and East Alachua County places an undue burden on protected classes, making this contributing factor a high priority.</p>		
Lack of access to opportunity due to high housing costs	Disparities in Access to Opportunity	High
Discussion: <p>High-opportunity neighborhoods are largely concentrated in West Gainesville and in neighboring County census tracts, as detailed in a review of opportunity indices. Simultaneously, these same communities feature some of the region's most expensive housing markets. This reality forces lower-income families to live in areas with significantly lower spatial proximity to opportunities like jobs and education. Low-income families are disproportionately protected-class members, making this contributing factor a high priority.</p>		
Private discrimination	Segregation/Integration RECAPs Disparities in Access to Opportunity	Medium
Discussion: <p>Low-income and protected class members face high levels of unreported housing discrimination from private housing providers. Of particular concern is discrimination on the basis of criminal background. A significant portion of landlords in the region are not aware of HUD guidance on the use of blanket criminal background check policies issued in 2015. Community members reported exclusion from housing opportunity due to a criminal background, even if the recorded offenses occurred many years in the past, or for minor offenses, making this contributing factor a medium priority.</p>		
Access to financial services	Disparities in Access to Opportunity	Medium
Discussion: <p>There are FDIC-insured bank locations concentrated in West Gainesville and in neighboring County communities, and less predominant locations in East Gainesville and in neighboring County communities. Given the concentration of protected class members in East Gainesville, this raises slight concerns related to access to financial services in these communities, making this contributing factor a medium priority.</p>		

Loss of Affordable Housing	Segregation/Integration RECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing Disability and Access	High
Discussion: <p>An ageing housing stock is causing the loss of affordable housing throughout the region. Many homes in the region, specifically in the East Gainesville target area, do not meet housing quality standards. Deterioration of the current affordable housing stock causes high utility costs and presents hazardous conditions, often resulting in low income residents having to leave their homes.</p> <p>Gentrification is occurring as the region accommodates the growing needs of the local and state colleges, pushing low income residents in the SW Student Housing Corridor RECAP and East Gainesville target area further out of the city and into the region's rural areas. What is commonly known as affordable housing in these RECAP or target areas is being renovated to accommodate growth and is forcing low income persons to seek alternative housing.</p> <p>Alachua County is also experiencing a loss in landlords that will participate in voucher programs, specifically the VASH program, due to issues with tenants such as substance abuse, drug usage, buying and selling of drugs, and damage to units.</p> <p>Further, Public Housing Authorities (PHAs) are hampered by Federal regulations when they try to change and grow. Funding is primarily provided at the State level through tax credits that are awarded by the Federal government and funding at an affordable rate is highly competitive and can take years for adequate funds to redevelop aged housing stock. These constraints add to the affordable housing crises in the City and County, making this contributing factor a high priority.</p>		
Displacement of and/or lack of housing support for victims of DV	Publicly Supported Housing Disproportionate Housing Needs	Medium
Discussion: <p>Many victims of domestic violence, in an interpersonal relationship, rely financially on their offender. This level of dependence makes it difficult for victims of domestic violence to afford or maintain housing on their own, resulting in the inability to obtain housing upon being displaced. Further, the offender has isolated the victim from family and friends who could offer financial assistance. Financial dependence remains as a barrier to victims of domestic violence, specifically when required to provide large deposits and money up front for housing. Supportive housing is limited throughout the region, however, the conversation has begun within Alachua County to implement more supportive housing, making this contributing factor a medium priority.</p>		

Community Opposition	Publicly Supported Housing	High
<p>Discussion:</p> <p>A significant barrier to increasing affordable housing and developing publicly supported housing in the region is the Not In My Back Yard Syndrome (NIMBYism). The Gainesville Housing Authority and the Alachua County Housing Authority are both met with opposition from the community. There is a stereotype associated with public housing residents and Housing Choice Voucher participants that is hard to overcome.</p> <p>While it is recognized that subsidized housing is needed, there is also the perception that it should be contained – not in my backyard – so to speak; and, part of this misperception is due to generational poverty. The inability to develop public housing in locations accessible to reliable public transportation and better economic opportunities acts as a barrier to increasing affordable housing and to supporting upward mobility for public housing residents, making this contributing factor a high priority.</p>		
Lack of affordable, accessible housing in range of unit sizes	Disability and Access	Medium
<p>Discussion:</p> <p>Affordable, accessible housing is limited throughout the region. The majority of housing for persons with disabilities is provided through group homes, with a very small portion of this population living independently. The group home environment does not allow for a range in unit sizes and usually only provides 1-2 bedroom units. Persons with disabilities living independently, in units with more than 2 bedrooms, are often forced from their homes due to high cost of retrofitting for accessibility. Efforts to increase affordable, accessible housing continue through organizations such as ARC, Meridian, and the local housing authorities, making this contributing factor a medium priority.</p>		
Lack of affordable, integrated housing for individuals who need supportive services	Disability and Access	High
<p>Discussion:</p> <p>Much of the disabled population lives in group homes located in Gainesville or leased single-family homes in Alachua County. Persons with disabilities living in group homes tend to be more segregated due to needing 24-hour care. The goal of organizations serving this population is to provide services to both institutionalized and non-institutionalized persons with disabilities so that they can become more independent and live in more integrated settings.</p> <p>There is limited affordable integrated housing for persons with disabilities throughout the region, and very few units specifically designated for persons with disabilities. Regionally, supportive services for persons with disabilities are largely available through organizations serving this population such as ARC, Meridian, and CILNCF. Disabled persons residing in group homes, managed by these organizations, have better access to supportive services. For non-institutionalized persons with disabilities, access to transportation is a significant barrier to receiving essential supportive services, often eliminating the opportunity to live independently and perpetuating the cycle of segregation, making this contributing factor a high priority.</p>		

Access to transportation for persons with disabilities	Disability and Access	High
<p>Discussion:</p> <p>For the general population within the region, access to transportation continues to be an impediment and it is even greater for persons with disabilities. The Regional Transit System is largely driven by the student population in the City of Gainesville. Bus line transportation routes and schedules are designed to serve the students of the local colleges and universities, specifically the University of Florida.</p> <p>The Regional Transit System does offer ADA complementary para-transit service which provides door-to-door service to para-transit certified people on an appointment basis, however, service after 9:00 pm is restricted to within 3/4 of a mile from certain routes. Also, reservations have to be made in advance as same day reservations generally cannot be accommodated and bus service in Alachua County is unavailable, limiting access to essential services, healthcare, and educational or employment opportunities.</p> <p>Though service providers try to supplement transportation services to assist in meeting the needs of persons with disabilities, supplemental transportation is limited and public transportation does not sufficiently serve this population, making this contributing factor a high priority.</p>		
Lack of affordable in-home or community-based supportive services	Disability and Access	Medium
<p>Discussion:</p> <p>There are three primary organizations providing supportive services for persons with disabilities throughout the region including ARC, Meridian, and CILNCF. Most services are provided on location of each organization. In home supportive services are limited and can be costly. These service providers operate as 501(c)(3) non-profit organizations so lack of funding is often a barrier in providing affordable in-home or community-based services.</p> <p>Limited resources makes it difficult to sufficiently meet the needs of this population, however, these organizations do provide an extensive array of services with the funding they have, making this contributing factor a medium priority.</p>		
Lack of Local Private Fair Housing Outreach and Enforcement	Fair Housing Enforcement, Outreach Capacity, and Resources	Medium
<p>Discussion:</p> <p>There is a general lack of private market understanding of the latest fair housing rules and requirements, especially related to criminal background check policies circulated by HUD. Further, this study reports a general lack of FHIP agencies operating in the study area, leading to poor outreach and education related to fair housing issues.</p> <p>Given the ongoing concerns related to criminal background check policy from HUD, and the need for outreach related to those policies, the region requires a more intense outreach and public awareness campaign for these matters, making this contributing factor a medium priority.</p>		

Lack of Resources for Fair Housing Agencies and Organizations	Fair Housing Enforcement, Outreach Capacity, and Resources	High
<p>Discussion:</p> <p>There is a lack of funds available for fair housing agencies and organizations operating in the study area. There are no FHIP agencies operating in the area, and legal aid agencies do not have specific core functions around fair housing testing, outreach, or enforcement.</p> <p>Stakeholder feedback also suggests a significant number of fair housing cases are categorized as non-housing related and handled through other funding sources. This fact reinforces the perception that fair housing cases are underreported in the region. Further funding would result in stronger fair housing enforcement, education, and outreach, making this contributing factor a high priority.</p>		

Fair Housing Goals

Table 36 Fair Housing Goals					
#	Goal	Contributing Factors	Fair Housing Issues	Timeframe for Achievement	Responsible Program Participant(s)
1	Increase the production and preservation of affordable housing units in a range of sizes in R/ECAPs and in high opportunity areas	Land use and zoning laws Availability of affordable units in a range of sizes Location and type of affordable housing Deteriorated and abandoned properties Loss of affordable housing Lack of access to opportunity due to high housing costs	Segregation/Integration R/ECAPs Disparities in Opportunity Disproportionate Housing Needs Publicly Supported Housing	PY 2018 -2022	City of Gainesville Alachua County

Metrics/Milestones/Recommendations:

- Within 1 year, establish a formal process for the review and revision of rules, regulations, and development standards that impact the supply of affordable housing, including allowing for higher density development in the County, re-implementing the City's impact/connection fee reduction program in the City and the County's Impact Fee Assistance Program.
- Within 1 year, adopt an inclusionary zoning ordinance that prioritizes mixed-income housing in desirable neighborhoods.
- Within 6 months and annually thereafter, meet with developers of affordable housing to provide technical assistance that informs them about developer incentives and resources that are available for the production/preservation of affordable housing and encourage them to take advantage of these programs.
- Within 1 year, develop an interactive map that identifies sites in high opportunity areas in the City and the County that are suitable for the development of affordable housing.
- Within 5 years, continue to rehabilitate substandard housing and replace dilapidated housing units to improve the quality of the existing affordable housing stock.
- Within 2 years, explore other strategies that can increase the stock of affordable housing including establishing a CLT or establishing a local housing trust fund to provide additional resources for affordable housing.

Discussion:

There is an overall shortage of affordable housing in the jurisdiction and the region and the groups most impacted include low-income renters and non-family and large family households. Increasing the supply of affordable housing will increase fair housing choice and access to opportunity because lower income individuals and households are disproportionately protected class members. Given the pattern of segregation in Gainesville, there needs to be a two-fold approach to promoting integration. One approach includes maintaining and preserving the existing affordable and publicly assisted housing stock and encouraging new construction of mixed income housing in R/ECAPs. This approach will reduce disproportionate housing needs and combat segregation and disparities in access to opportunity by attracting reinvestment in these areas. The second approach is to incentivize affordable housing development in high-opportunity areas with better access to opportunities like good schools, job centers, and reliable transportation.

Revisions to the zoning and development regulations will eliminate impediments to fair housing caused by land use and zoning laws and increase the supply of affordable housing in the City and in the region. Since land use and zoning policies determine the location and size of housing and impacts the cost of developing housing, zoning provisions that restrict the development of affordable housing need to be revised and incentives need to be in place. The City and County already have developer incentives in place and the County recently proposed additional incentives to encourage the development of affordable housing, however, additional outreach and education for developers is essential for incentive to be effective.

The City and the County continuing to support affordable housing projects with HOME, CDBG, and SHIP funding will help to overcome barriers to affordable housing impeded by the abundance of deteriorated or abandoned units. Projects will include the rehabilitation and/or replacement of substandard housing in R/ECAPs to improve the quality of the existing affordable housing stock. The revitalization of disadvantaged neighborhoods may also include demolition of dilapidated housing however this will be considered as part of a strategic revitalization plan to prevent further deterioration of these neighborhoods. In regard

to new housing construction, prioritizing funding for new construction in high-opportunity areas will assist in eliminating this contributing factor.

2	Increase homeownership opportunities for low-and moderate-income persons and protected class members	Availability of affordable units in a range of sizes Location and type of affordable housing Income and education disparities	Segregation/Integration R/ECAPs Disparities in Opportunity Disproportionate Housing Needs Publicly Supported Housing	PY 2018-2022	City of Gainesville Alachua County GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, develop affordable homeownership units in disadvantaged communities to stabilize these neighborhoods and prevent gentrification.
- Within 5 years, continue to provide or support public services including homebuyer education, financial literacy, and foreclosure prevention counseling and financial assistance.

Discussion:

The homeownership rate in the City of Gainesville is 37.7% compared to 54.8% in the region. Additionally, the majority of homeowners in both the City and region are White individuals. Preserving and increasing homeownership for low- and moderate-income persons, minorities, and persons with disabilities helps to stabilize neighborhoods and increase quality of life through wealth building. To increase homeownership and overcome related contributing factors, the City will develop affordable homeownership units in R/ECAPs and gentrifying neighborhoods. Both the City and County will continue to fund non-profit organizations that provide homeownership counseling, foreclosure prevention counseling, and credit and financial literary programs. The City and the County will also provide direct financial assistance to homebuyers to subsidize the cost of housing and reduce disproportionate housing needs.

3	Increase public investment and encourage private investment in East Gainesville to address disparities in housing, proficient schools, employment opportunities, services, and public facilities and infrastructure	Lack of private investment in specific neighborhoods Lack of public investment in specific neighborhoods Lack of community revitalization strategies Location of proficient schools Location of employers	Segregation/Integration R/ECAPs Disparities in Opportunity Disproportionate Housing Needs Publicly Supported Housing	PY 2018-2022	City of Gainesville Alachua County GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 1 year, establish a workforce to improve coordination with government agencies including the School District, RTS, the housing departments, and the public housing authorities to reduce disparities in access to opportunity in East Gainesville.
- Within 2 years, adopt a strategic revitalization plan in partnership with organizations and individuals that have a common goal of increasing opportunities and fair housing choice in East Gainesville and that will leverage private and public investments in a targeted manner.
- Within 5 years, offer economic incentives for housing developers, businesses, and other interested entities to assist in the redevelopment of East Gainesville.
- Within 5 years, coordinate with the Economic Development Department and seek the services of a marketing firm to design several campaigns to attract businesses to East Gainesville.
- Within 2 years, implement quarterly meetings between local government and the School Board to enhance agency coordination and encourage cooperation in managing growth in West Gainesville schools and disinvestment in East Gainesville Schools.

Discussion:

There is a lack of public and private investment in East Gainesville that is perpetuating disparities in access to opportunity, disproportionate housing needs, and other fair housing issues. While both private and public investment has been occurring, there is a lack of coordination and a disjointed revitalization approach.

The establishment of a workforce to improve coordination and development of a strategic revitalization plan for neighborhoods most in need will help to address the lack of public and private investment. The strategic revitalization plan will improve conditions and eliminate disparities in access to opportunity between residents of those neighborhoods and the rest of the jurisdiction and region. The plan will include realistic strategies and proposed funding sources for housing rehabilitation or construction, economic development and investment in businesses, public transit, educational opportunities, access to jobs, public infrastructure and facilities, schools, and address disparities in the provision of municipal services.

4	Increase access / reliability of public transportation for low- and moderate-income persons and persons with disabilities	<p>Availability, type, frequency, and reliability of public transportation</p> <p>Availability, type, frequency, and reliability of public transportation for persons with disabilities</p>	<p>Disparities in Access to Opportunity</p> <p>Disability and Access</p>	PY 2018-2022	<p>City of Gainesville</p> <p>Alachua County</p>
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Metrics/Milestones/Recommendations:

- Within 1 year, establish a committee to increase agency coordination between RTS, local government departments, and non-profits serving low-income residents and persons with disabilities.
- Within 3 years, the City should utilize federal funding, such as CDBG public service funds, to subsidize transportation costs for low-income residents and persons with disabilities.
- Within 5 years, the County should seek additional state or federal funding to provide subsidies for a public transportation voucher program, gas voucher program, or taxi voucher program for Alachua County residents.
- Within 2 years, implement policy requiring developers to consult with RTS during the initial planning phase and prior to construction, specifically in the County where there is limited access to public transportation.

Discussion:

There is a lack of frequent and reliable public transportation in most areas of Alachua County, including areas to the East of Gainesville where many low-income and protected class residents live. Further exacerbating the challenges of relying on public transportation for daily use, areas in Northwest and West Gainesville, and in the County just outside the City boundary, are areas with the highest number of job opportunities. This relationship between strong job centers to the West with a disproportionate concentration of protected class members in East Gainesville and East Alachua County places an undue burden on

protected classes

Further, access to transportation continues to be a greater barrier for persons with disabilities. The Regional Transit System is largely driven by the student population in the City of Gainesville. Bus line transportation routes and schedules are designed to serve the students of the local colleges and universities, specifically the University of Florida. The Regional Transit System does offer ADA complementary para-transit service which provides door-to-door service to para-transit certified people on an appointment basis, however, service after 9:00 pm is restricted to within 3/4 of a mile from certain routes. Also, reservations have to be made in advance as same day reservations generally cannot be accommodated and bus service in Alachua County is unavailable, limiting access to essential services, healthcare, and educational or employment opportunities.

Though service providers try to supplement transportation services to assist in meeting the needs of persons with disabilities, supplemental transportation is limited and public transportation does not sufficiently serve this population. Increasing coordination between local government departments, non-profit organizations serving these populations, and RTS will assist in overcoming the related contributing factors. To further eliminate transportation barriers, consideration of subsidy programs is essential.

Because of the growth in West Gainesville and limited transportation options within the County, it is important that developers consult with RTS during the planning process. Coordination between developers and RTS will help manage growth patterns and will open the discussion for extending public transportation further into the County.

5	Increase educational attainment and employment opportunities, specifically in East Gainesville	Income and education disparities	Segregation R/ECAPs Disparities in Access to Opportunity	PY 2018-2022	City of Gainesville GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, improve job opportunities through increased education and training programs.
- Within 5 years, support public service programs that provide childcare, short term assistance, financial counseling, credit repair and other services that improve self-sufficiency.
- Within 5 years, fund economic development projects that will attract higher-skilled jobs to East Gainesville to increase wages.

Discussion:

One of the reasons for the segregation that is occurring in Gainesville is disparities in income and education level for minorities and persons with protected

characteristics. In order to reduce these disparities and to foster more inclusive communities, the City, GHA, and ACHA will support job training and additional self-sufficiency programs that serve residents in R/ECAPs and for public housing residents. Further, supporting programs and services that lead to job stability and the potential to increase earnings and improve living conditions will assist in overcoming related contributing factors.

6	Enhance outreach and education regarding affordable housing development	Community opposition	Publicly Supported Housing	PY 2018-2022	City of Gainesville Alachua County GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 1 year, establish a committee of affordable housing advocates with a broad range of interests to educate elected officials on the importance of affordable housing.
- Within 2 years, meet with homeowner associations and hold resident meetings to address legitimate concerns regarding affordable housing development.

Discussion:

Community opposition is a significant barrier to increasing affordable housing and developing publicly supported housing in the region. The Not In My Back Yard Syndrome (NIMBY) continues to perpetuate segregation through the objection of developing affordable housing in specific areas of the community. This is of particular concern for the public housing authorities. The Gainesville Housing Authority and the Alachua County Housing Authority are both met with opposition from the community. There is a stereotype associated with public housing residents and Housing Choice Voucher participants that is hard to overcome.

Education is a primary cause of NIMBYism and it is critical that elected officials and residents of the community are knowledgeable about the Fair Housing Act, how important affordable housing is, and its connection to the health of a community. Establishing an affordable housing committee and increasing outreach and education throughout the region will assist in overcoming related contributing factors and will ultimately create a discussion around affordable housing that many residents would otherwise avoid.

7	Increase landlord participation in affordable housing programs	Loss of affordable housing	Publicly Supported Housing	PY 2018-2022	GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 1 year, set-up a hotline for landlords to call to report issues with renters.
- Within 1 year, provide incentives to landlords including:
 - Tax incentives to landlords who rent to voucher holders;
 - One-time signing bonus to landlords;
 - Fast track inspections;
 - Allow paying rent by electronic deposit.

Discussion:

Housing Choice Vouchers is the predominant program utilized across all publicly supported housing categories with GHA having 1,579 vouchers and ACHA having 920. The HCV program is in high demand because of its nature in allowing renters to choose their housing location, often allowing low-income persons to reside in areas of opportunity. Though the demand for vouchers is high, landlord participation is low, which leads to the same cycle of segregation and often forces low-income renters to live in unsafe or hazardous conditions.

Lack of landlord participation is increasingly becoming a significant barrier to affordable housing. Alachua County is specifically experiencing a loss of landlords participating in publicly supported housing programs due to issues with tenants such as substance abuse, drug usage, buying and selling of drugs, and damage to units. Creating a better relationship with landlords and helping to reassure them of the benefits of participation is critical to maintaining affordable housing. Providing incentives will assist in overcoming contributing factors related to the loss of landlord participation.

8	Increase the availability of publicly supported housing designated for the elderly, persons with disabilities, and families with children	Lack of affordable, accessible housing in a range of unit sizes Lack of affordable, integrated housing for individuals who need supportive services	Publicly Supported Housing Disability and Access	PY 2018-2022	City of Gainesville GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, designate a percentage of public housing units for the elderly.
- Within 5 years, designate a percentage of Housing Choice Vouchers for use by the elderly.
- Within 5 years, designate a percentage of scattered site/integrated public housing units for persons with disabilities.
- Within 5 years, designate a percentage of Housing Choice Vouchers for persons with disabilities to use for scattered site/integrated housing.
- Within 5 years, evaluate and revise policies that impede access to housing in integrated settings for persons with disabilities.
- Within 5 years, enhance coordination and continue to provide financial support to non-profit organizations developing senior housing or integrated housing for persons with disabilities.

Discussion:

For all publicly supported housing in the jurisdiction and region, 18.43% of public housing units are elderly households, 27% of Project-Based Section 8 are elderly households, 16% are elderly households utilizing the HCV Program, and there are no reported elderly households in other multi-family housing units. Persons with disabilities residing in publicly supported housing in the jurisdiction represent 26.59% of public housing units, 21.60% of Project-Based Section 8 units, 82.61% of other multi-family units, and 24.63% of HCV Program units.

The GHA is seeking to designate 171 low-income public housing units in its Oak Park and Sunshine Park Developments as senior only and apply for 40 additional vouchers to meet the needs of the disabled population. The ACHA is considering plans to convert its 34 unit public housing at Rocky Point to senior housing. Currently, ACHA does not have any publicly supported housing designated for the elderly or persons with disabilities. The application process for publicly supported housing is open to the general population, meaning that units may occupy elderly or persons with disabilities. Currently ACHA's publicly supported housing units are occupied 187 elderly and 735 persons with disabilities.

The Analysis determined that despite efforts, there is a lack of available publicly supported housing units for the elderly and persons with disabilities. GHA and ACHA designating housing units for the elderly and persons with disabilities will ensure an increase in affordable accessible publicly supported housing available in a range of sizes. In addition, designating scattered site units and Housing Choice Vouchers for persons with disabilities, allows for increased choice

in housing location and supports housing integration for persons with disabilities. Implementing these metrics will assist in overcoming related contributing factors.

9	Increase fair housing resources and agency participation in fair housing activities	Lack of resources for Fair Housing agencies and organizations	Fair Housing Enforcement, Outreach Capacity, and Resources	PY 2018-2022	City of Gainesville Alachua County
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Metrics/Milestones/Recommendations:

- Within 2 years, seek additional funding from state or federal resources for non-profit agencies and housing providers so that more agencies can engage in fair housing outreach, education, and enforcement.
- Within 5 years, provide direct financial assistance to non-profit organizations to provide fair housing services.

Discussion:

There are only a few local and regional agencies/organizations that provide fair housing information, outreach, and enforcement in the Gainesville or Alachua County area including:

- Alachua County Equal Opportunity Office. Funded through County general revenue, with 4.75 full-time employees.
- City of Gainesville Office of Equal Opportunity. Funded through City general revenue.
- Three Rivers Legal Services. Principally funded through the Legal Services Corporation (LSC). No HUD funding.

Many agencies that have the capacity to provide fair housing services are non-profit organizations operating on a limited budget. The lack of funding and lack of resources to provide additional funds impedes fair housing in the area. Seeking additional resources, and local government providing direct financial assistance through their federal grant programs, will allow more organizations to get involved in fair housing activities, outreach, and enforcement and will assist in overcoming related contributing factors.

Data Sources Used in this Assessment

HUD Assessment of Fair Housing Data and Mapping Tool (AFFHT0003) - HUD is taking a more active role in assisting program participants to prepare the required Assessment of Fair Housing by providing data and analytical tools to help grantees quantify and interpret particular fair housing issues. HUD provides a dynamic online mapping and data-generating tool (AFFH-T) for communities to use in their completion of the Assessment of Fair Housing using the Assessment Tool. The data set provided by HUD includes a set of tables and Arc GIS maps that participants must analyze. There are several versions of the AFFH-T as HUD continues to update the tool. For the purpose of this analysis, the most recent version of the tool, version 3 (AFFHT0003), was used to develop the report.

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.

- 2013 ACS 1-Year Estimates – Based on data collected between January 2012 and December 2012, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Census 2010 data and available for more geographic areas than the ACS 1-Year Estimates, 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 2008-2012 ACS 5-year estimates are used most often in this assessment.

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Analysis (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 percent data”, meaning that it contains the data collected from every household that participated in the 2010 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 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” 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; therefore, SF 3 data from the 2000 Census was the only tract-level data source available for some variables.

Previous Works of Research – This Assessment of Fair Housing is supported by, and in some cases builds upon, previous works of significant local research conducted for or within the region. These include the following:

- City of Gainesville 2013-2018 Five-Year Consolidated Plan
- City of Gainesville previous Analysis of Impediments to Fair Housing Choice
- City of Gainesville Comprehensive Plan
- City of Gainesville PY 2015 Consolidated Annual Performance and Evaluation Report (CAPER)
- City of Gainesville Capital Improvement Plan
- City of Gainesville Community Redevelopment Agency Plans
- Alachua County 2016 and 2017 Capital Improvement Plans
- Alachua County Comprehensive Plan
- Alachua County State Housing Initiatives Partnership (SHIP) Local Housing Assistance Plan
- Gainesville Housing Authority Five Year Plan
- Alachua County Housing Authority Five Year Plan

Definitions

Accessory Dwelling Unit (ADU) A residential unit that is secondary to the primary residence of the homeowner. It can be an apartment within the primary residence or it can be an attached or freestanding home on the same lot as the primary residence.

Affirmatively Furthering Fair Housing (AFFH) The federal Fair Housing Act requires federal agencies and federal grantees, including recipients of HUD Community Planning & Development (CPD) funds, to affirmatively further fair housing. According to HUD's AFFH rule, this means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

Affordable Housing	Generally speaking, housing is considered affordable if it costs no more than 30% of a household's gross income. Costs such as utilities, mortgage insurance, and homeowners or condominium association fees are included when determining if housing costs are affordable. The term "affordable housing" is also commonly used to refer to housing that receives public subsidy to reduce the cost for low- and moderate-income households, whether the housing itself is publicly or privately owned.
Analysis of Impediments to Fair Housing Choice (AI)	A document that analyzes impediments to fair housing choice in a community and proposes goals to address these impediments, in accordance with input from community residents and stakeholders. Recipients of HUD Community Planning & Development (CPD) funds have been required to prepare AIs since the 1990s. Under HUD's new AFFH Rule, issued in 2015, the Assessment of Fair Housing (AFH) replaces the AI as the fair housing planning document that HUD CPD grantees and PHAs are required to prepare.
Area Median Income (AMI)	Median annual household income (pre-tax) for a metropolitan area, subarea of a metropolitan area, or non-metropolitan county.
Assessment of Fair Housing (AFH)	A document that analyzes barriers to fair housing choice in a community and proposes goals to address these barriers, in accordance with input from community residents and stakeholders. Recipients of HUD Community Planning & Development (CPD) funds and Public Housing Authorities (PHAs) are required under HUD's new AFFH Rule, issued in 2015, to prepare an AFH at least every five years. The AFH replaces the Analysis of Impediments to Fair Housing Choice (AI) as the fair housing planning document that HUD CPD grantees and PHAs are required to prepare.
Community Housing Development Organization (CHDO)	A community-based nonprofit organization that is involved in providing affordable housing and meets HOME program requirements for Board of Directors composition, experience, and organizational capacity. Jurisdictions that receive HOME funds from HUD ("Participating Jurisdictions" or PJs) must set aside at least 15% of their HOME allocation certain activities to be conducted by organizations that qualify as CHDOs, as determined by the PJ.
Community Redevelopment Agency (CRA)	A local public entity created by a County or municipality government, with board members appointed by that government body. A CRA has certain powers related to redevelopment, including designating slum or blighted areas as Community Redevelopment Areas, developing community redevelopment plans for these areas, using Tax Increment Financing to fund redevelopment, and exercising eminent domain in Community Redevelopment Areas.

Core Based Statistical Area (CBSA)	A CBSA consists of the county or counties associated with at least one core (urbanized area or urban cluster) with a population of at least 10,000, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.
Extremely Low-Income (ELI)	Household is at or below 30% of the Area Median Income (AMI) for households of the same size.
Fair Housing Act	The federal Fair Housing Act was initially passed in 1968, and prohibited housing discrimination on the basis of race, color, religion, or national origin ("protected classes"). Subsequent amendments to the Fair Housing Act have added sex, familial status, and disability to the list of protected classes. The Fair Housing Act prohibits activities such as refusing to rent or sell housing on the basis of a protected class, as well as steering renters and homebuyers to certain neighborhoods or offering them higher prices or less favorable terms than other clients.
Fair Housing Assistance Program (FHAP)	A HUD program that provides noncompetitive funding annually on a noncompetitive basis to state and local agencies that enforce fair housing laws that HUD has determined to be substantially equivalent to the federal Fair Housing Act. These agencies investigate and enforce complaints of housing discrimination that arise within their jurisdiction.
Fair Housing Initiatives Program (FHIP)	A HUD program that provides funding on a competitive basis to fair housing organizations and other nonprofits to help connect people who have experienced housing discrimination with government agencies that handle complaints of housing discrimination. FHIP grantee organizations also conduct preliminary investigation of claims.
Familial Status	Familial status refers to whether a household has children under 18 or anticipated (unborn) children. Familial status is a protected class under fair housing law, meaning that housing providers cannot discriminate against renters and homebuyers based on the presence or anticipated presence of children in their household.
Limited English Proficiency (LEP)	A person's ability to speak English, as reported to the U.S. Census Bureau, is less than "very well."
Low- and Moderate-Income (LMI)	In the context of Home Mortgage Disclosure Act (HMDA) data, LMI refers to a mortgage applicant whose household income is <50% of Area Median Income (AMI) (low-income) or between 50% and <80% AMI (moderate-income). Note that the definitions of "low- and moderate-income" for LMI mortgage applicants are different from the definitions used in other contexts in this report.

Low- and Moderate-Income Census Tracts (LMITs)	In Home Mortgage Disclosure Act (HMDA) data, LMIT refers to Census tracts where the Median Family Income is <50% of Area Median Income (AMI) (low-income) or between 50% and <80% AMI (moderate-income). Note that the definitions of "low- and moderate-income" for LMITs are different from the definitions used in other contexts in this report.
Low-Income (LI)	In this report and in most federal and Florida housing programs, a low-income household is one whose income is at or below 80% of the Area Median Income (AMI) for households of the same size.
Medically Underserved Area (MUA)	An area designated by the U.S. Health Resources and Services Administration (HRSA) as having too few primary care providers, high infant mortality, high poverty or a high elderly population.
Metropolitan Statistical Area (MSA)	A Core-Based Statistical Area (CBSA) associated with at least one urbanized area that has a population of at least 50,000. The metropolitan statistical area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.
Middle- and Upper-Income (MUI)	In the context of Home Mortgage Disclosure Act (HMDA) data, MUI refers to a mortgage applicant whose household income is between 80% and <120% of Area Median Income (AMI) (middle-income) or 120% AMI or higher (middle-income). Note that the income range defined as "middle-income" for MUI mortgage applicants is referred to as "moderate-income" in other contexts in this report.
Middle-Income Census Tracts (MINTs)	In Home Mortgage Disclosure Act (HMDA) data, MINT refers to Census tracts where the Median Family Income is between 80% and <120% AMI (middle-income). Note that this income range is defined as moderate-income in other contexts in this report.
Moderate-Income	In this report and in most Florida housing programs, a low-income household is one whose income is greater than 80% of the Area Median Income (AMI) but no higher than 120% AMI for households of the same size.
Not In My Back Yard (NIMBY)	A phenomenon where residents of a neighborhood resist the development of new land uses in their neighborhood that are considered undesirable. Proposed affordable housing developments often face NIMBY resistance based on stereotypes about affordable housing and its inhabitants.

Protected Class	A protected class (or protected group) is a demographic designation on which basis it is illegal to discriminate in the housing market. Protected classes under federal and Florida law include race, color, religion, national origin, sex, familial status, and disability.
Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	The HUD AFFH Rule defines a R/ECAP as “a geographic area with significant concentrations of poverty and minority concentrations.” An area is defined by HUD as a R/ECAP if its population is at least 50% non-White and it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.
Very Low-Income (VLI)	In this report and in most federal and Florida housing programs, a very low-income household is one whose income is at or below 50% of the Area Median Income (AMI) for households of the same size.

Acronyms

Acronym Meaning

ABE	Adult Basic Education
ACS	American Community Survey
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AFFH	Affirmatively Further(ing) Fair Housing
AFFHT	Affirmatively Furthering Fair Housing Tool
AFH	Assessment of Fair Housing
AHAB	Affordable Housing Advisory Board
AHAC	Affordable Housing Advisory Committee
AI	Analysis of Impediments to Fair Housing Choice
AMI	Area Median Income
CBSA	Core Based Statistical Area
CDBG	Community Development Block Grant
CDC	Community Development Corporation
CHDO	Community Housing Development Organization
CPD	HUD Office of Community Planning and Development
CRA	Community Redevelopment Agency

Acronym Meaning

CRA	Community Redevelopment Area
CRA	Community Reinvestment Act (for information purposes only - the acronym CRA is not used to refer to the Community Reinvestment Act in this document)
DOAH	Florida Division of Administrative Hearings
DPN	Disability Program Navigator
ELI	Extremely Low-Income
EPA	U.S. Environmental Protection Agency
ESG	Emergency Solutions Grant
FAAST	Florida Alliance for Assistive Services and Technology
FCHR	Florida Commission on Human Relations
FDIC	Federal Deposit Insurance Corporation
FHA	Fair Housing Act
FHA	Federal Housing Administration (for information purposes only - the acronym FHA is not used to refer to the Federal Housing Administration in this document)
FHAP	HUD Fair Housing Assistance Program
FHEO	HUD Office of Fair Housing and Equal Opportunity
FHIP	HUD Fair Housing Initiatives Program
FSS	Family Self-Sufficiency Program
GED	General Equivalency Diploma
HCV	Housing Choice Voucher (also known as Section 8 voucher)
HMDA	Home Mortgage Disclosure Act
HOME	HOME Investment Partnerships Program (usually referred to as "HOME")
HOPE VI	Refers to a HUD program that provided funds for demolition and redevelopment of severely distressed public housing sites
HOPWA	Housing Opportunities for Persons With AIDS
HRSA	Health Resources and Services Administration (an agency of the U.S. Department of Health and Human Services)
HUD	U.S. Department of Housing and Urban Development
LEP	Limited English Proficiency
LGBTQ	Lesbian, Gay, Bisexual, Transgender, Queer
LHAP	Local Housing Assistance Plan

Acronym Meaning

LI	Low-Income
LIHTC	Low Income Housing Tax Credit
LMI	Low- and Moderate-Income
LMIT	Low- and Moderate-Income [Census] Tracts
MAP	Mortgage Assistance Program
MINT	Middle-Income [Census] Tracts
MSA	Metropolitan Statistical Area
MUA	Medically Underserved Area
MUI	Middle- and Upper-Income
NAACP	National Association for the Advancement of Colored People
NCRC	National Community Reinvestment Coalition
NIMBY	Not In My Back Yard
NSA	Negotiated Settlement Agreement
NSP	Neighborhood Stabilization Program
PHA	Public Housing Authority
R/ECAP	Racially/Ethnically Concentrated Area of Poverty
RAB	Resident Advisory Board
RAD	Rental Assistance Demonstration
ROSS	Resident Opportunity for Self-Sufficiency
SAIL	State Apartment Incentive Loan
SHIP	State Housing Initiatives Partnership
SSDI	Social Security Disability Insurance
SSI	Supplemental Security Income
TDD	Telecommunications Device for the Deaf
USDA	U.S. Department of Agriculture
VA	U.S. Department of Veterans Affairs (acronym is also used to refer to VA medical centers and other VA offices)
VLI	Very Low-Income

II. Community Participation Process

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.*

In accordance with 24 CFR 5.158, and the lead agency's Citizen Participation Plan, the participants conducted a comprehensive community participation process in a manner to ensure inclusion of all residents of the region; PHA residents and board members; and populations underrepresented such as persons residing in R/ECAPs, persons who are limited English proficient, and persons with disabilities.

The collaborating participants undertook a joint effort when advertising AFH public meetings, the on-line survey, and availability of the AFH and related tables and maps for public comment. In addition, the PHA participants advertised their community meetings separately to specifically reach public housing residents and board members to ensure their involvement in the process.

Public Meetings / PHA Community Meetings

Participants facilitated three (3) public meetings for City of Gainesville and Alachua County residents and stakeholders and each PHA participant held one (1) community meeting for public housing residents, housing choice voucher holders, and resident advisory board members.

The purpose of the public meetings was to inform residents and stakeholders about the AFH, describe the AFH process, solicit input on the development of the AFH, and make available tables and maps to be analyzed for the AFH.

Collectively, participants determined times and locations considered convenient for residents and stakeholders throughout the region. Meetings were held in the Northeast, Northwest, Southeast, and Southwest to provide better opportunities for residents to attend. Meeting dates, times, and locations are detailed in the table below.

Table 1
Community Participation Meetings

Public Meetings	
Monday June 26, 2017 5:30-7:00 p.m.	Senior Recreation Center 5701 NW 34 th Blvd. Gainesville, FL 32653
Thursday June 29, 2017 5:30 – 7:00 p.m.	Thomas Coward Auditorium Department of Community Support Services 218 SE 24th Street Gainesville, FL 32641
Thursday July 6, 2017 5:30 – 7:00 p.m.	SWAG Family Resource Center 807 SW 64 th Terrace Gainesville, FL 32607
Public Housing Authority Meetings	
Tuesday July 11, 2017 5:30-7:00 p.m.	Gainesville Technology Entrepreneurship Center 2153 SE Hawthorne Rd, #101 Gainesville, FL 32641
Thursday July 13, 2017 5:30-7:00 p.m.	Alachua County Housing Authority 703 NE 1 st Street Gainesville, FL 32601

On-Line Survey

To maximize engagement in the AFH process, participants developed an on-line survey. Though public meetings can be effective, on-line surveys are convenient and confidential, both of which are appealing to residents and stakeholders. The on-line survey contained a total of 100 questions and allowed for skip-logic dependent upon whether the responder was a resident; landlord or property manager; a real estate professional; a lender; a housing provider; or a social services provider, fair housing organization, or civil servant. The survey gathered information related to fair housing including knowledge of fair housing rights; discrimination complaints; whether or not housing choices are limited, affordable, or segregated; access to fair housing education; and demographic data. The survey also included quick response (QR) codes within the flyer providing direct access to the survey link from mobile phones. English and Spanish versions of the survey were available and the survey remained open from June to August.

Direct Agency Consultation

Participants developed a list of over 100 stakeholders to provide outreach to during the AFH process. Stakeholders were invited to participate in the public meetings, on-line survey, and comment period via direct email blasts to the organization contact. Additionally, participants conducted interviews with pertinent stakeholders to gather supplemental information for the AFH and ensure direct consultation with applicable organizations, including those representing persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities.

Advertisement of Outreach Activities

To maximize engagement, participants implemented various methods of advertisement for the outreach activities listed above. Participants focused the campaign on reaching the broadest audience possible, while also employing methods specific to underserved populations.

The outreach approach included utilizing local media resources such as newspaper, radio stations, television stations, and university news. Participants broadened outreach by utilizing their organizational websites, social media pages such as Facebook, publicizing the process in monthly newsletters, and sending out regional press releases. It is important to note that participants made every effort to advertise flyers and notices in an alternate language newspaper, however there are no such publications currently serving the Gainesville/Alachua County region.

Flyers were created to advertise the public meetings, PHA community meetings, and on-line survey. Flyers were distributed electronically to stakeholders including organizations representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Flyers were also distributed at public offices, public and university libraries, City Hall, and fair housing advocates distributed flyers to the general public.

The public housing participants, GHA and ACHA, extended advertising methods to specifically reach public housing residents and voucher holders. Both housing authorities included inserts in a utility

bill mailing to advertising the community meetings and on-line survey. The PHA participants also distributed flyers at their main offices and displayed advertisements on community bulletin boards.

Advertisement resources are listed below:

❖ *Newspaper:*

- Gainesville Sun
- The Guardian

❖ *Television:*

- WUFT-TV
- Community TV-12

❖ *Websites/Social Media:*

- *Official Websites*
 - www.cityofgainesville.org/
 - www.alachuacounty.us/Pages/AlachuaCounty.aspx
 - gainesvillehousingauthority.org/
 - www.acha-fl.com/
- *Facebook*
 - <https://www.facebook.com/GainesvilleFL/?ref=ts>
 - <https://www.facebook.com/AlachuaCounty/>
 - <https://www.facebook.com/AlachuaCoCSSHousing/>
 - <https://www.facebook.com/GainesvilleHousingAuthority/>
 - <https://www.facebook.com/pages/Alachua-County-Housing-Authority/>

❖ *Press Releases:*

- Alachua County Communications Office

2. *Provide a list of organizations consulted during the community participation process.*

Through various advertising techniques, the community participation process was designed to engage numerous social service and housing organizations. Participants identified over 50 organizations or groups relevant to the development of the AFH. The organizations identified were encouraged to

participate in the AFH process by direct invitation and/or direct consultation. A list of organizations contacted is detailed in the table below:

Table 2 Agency Consultation		
Organization Name	Type of Organization	Population Served
Alachua Habitat for Humanity	Affordable Housing	LMI
Neighborhood Housing and Development Corporation	Affordable Housing	LMI
Rebuilding Together, North Central Florida	Affordable Housing	LMI
The Arc of Alachua County	Social Service	Disabled
Alachua County Growth Management	Local Government	LMI
ElderCare of Alachua County-University of Florida Health	Social Service	Elderly
Alachua County Equal Opportunity Office	Local Government	LMI, R/ECAP Residents
Alachua County Department of Community Support Services	Local Government	LMI, Elderly, Veterans, Domestic Violence Victims
Christians Concerned for the Community	Religious	LMI
United Way of North Central Florida	Social Service	LMI
Central Florida Community Action Agency	Social Service	LMI
North Central Florida Alliance for the Homeless and Hungry	Continuum of Care (Lead Agency)	Homeless
Catholic Charities	Religious/Social Service	LMI, Homeless, Elderly, Families w/ Children
Gainesville Community Ministry	Religious	LMI, Homeless, Elderly, Families w/ Children
St. Madeleine Community Outreach	Religious/Social Service	LMI, Homeless, Elderly, Families w/ Children
Library Partnership	Social Service	LMI
Salvation Army	Social Service	LMI, Homeless, Families w/ Children
Alachua County Community Stabilization Program	Local Government	LMI
Milloy Transportation	Private	Elderly, Youth, Disabled
Alachua County Department of Community Support Services	Local Government	LMI
Alachua County Court Services	Local Government	General
Suskin Realty, Inc	Real Estate	General
FBT Mortgage	Lender	General
Alachua County School Board Parent Academy	Public Education	Students
Partnership for Strong Families	Social Service	Children
City Office of Equal Opportunity	Local Government	LMI, R/ECAP Residents
NAACP	Social Service/Advocacy	LMI, African American Residents
Front Porch Florida—Duval	State Government	General
Cultural Arts Coalition	Non-Profit	General

CRA Staff	Community Redevelopment	LMI, General
Eastside CRA Advisory Board	Community Redevelopment	LMI, General
5th Avenue/Pleasant Street CRA Advisory Board	Community Redevelopment	LMI, General
The Shimberg Center at UF	Affordable Housing / Housing Data	General
Gainesville-Alachua County Association of Realtors (GACAR)	Real Estate	General
Three Rivers Legal Services	Social Service / Legal Service	LMI, General
Black on Black Crime Task Force	Social Service	LMI, African American Residents
Center for Independent Living	Social Service	Disabled
School Board of Alachua County	Public Education	Students
Regional Transit System	Local/State Government	LMI, Students, Elderly, General
Alachua County Health Department	Local Government	LMI, General
Alachua County Sheriff's Office	Local Government	General
Blessed Hope Foundation of Newberry FL	Social Service / Homeless	LMI, Homeless
Bread of Mighty Food Bank	Social Service / Homeless	LMI, Homeless
Bridges of America	Private	Inmates
Castillo Enterprises LLC	Private	General
Community Agency Partnership (CAPP)	Local Government	LMI
Compassionate Friends	Non-Profit	General
Displaced Homemaker Program- Santa Fe Community College	State Government / Employment	General
Elder Options	Social Service	Elderly
Family Promise	Social Service	Homeless
Florida Home Builders Association	Affordable Housing	General
Florida Institutional Legal Services, Inc.	Social Service / Legal Service	LMI, General
Florida Works/One-Stop Career Center	Social Service / Employment	LMI, Unemployed
Gainesville Job Corps Center	Social Service / Employment	LMI, Unemployed
GNV4ALL	Community Group	LMI, R/ECAP Residents
GHA Board of Commissioners	Housing Authority	Public Housing Residents
Gainesville Florida Housing Corporation	Affordable Housing	LMI
Meridian	Social Service / Homeless	LMI, Homeless
Community Partners	Social Service	LMI
Caring and Sharing Learning School	Charter School Education	Students
Boys and Girls Club of Alachua County	Social Service	LMI, Youth, Families w/ Children
Pace Center for Girls	Social Service	LMI, Young Women
Alachua County Charmettes	Non-Profit	General

3. *Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?*

Coordinated outreach activities were intended to ensure participation on the broadest level throughout the region. Outreach activities targeted Gainesville and Alachua County residents; public housing residents; Housing Choice voucher holders; public housing residents advisory board members; City and County officials; and social service and housing organizations, including organizations serving populations who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities.

To elicit broad community engagement, participants utilized all outreach methods available including media outlets, internet, mobile QR codes, USPS mail, and word of mouth advertising. Though a concerted effort was put forth to advertise the public meetings and housing authority community meetings, participation was lower than expected. All meetings combined yielded approximately 70 participants, most representing organizations. The Gainesville Housing Authority resident/board member meeting received the best turn out with 26 residents, voucher holders, and board members present.

Reasoning for low participation at the public meetings can only be speculated, however, access to reliable transportation was a common topic discussed, so it is highly possible that many Gainesville or Alachua county residents did not have transportation to attend the meetings. The majority of ACHA's public housing is scattered site units for voucher holders and not on site housing. Many public housing residents do not have access to transportation either. Additionally, it seems that residents preferred participating through the survey rather than attending meetings. This could be because of transportation issues, but it is probable that residents prefer the confidential nature of the survey.

The on-line survey was successful in gathering nearly 270 responses, 80% of which are from residents; 9% from social service providers, fair housing organizations, or civil servants; 6% from landlords or property managers, 3% from housing providers, and 2% from real estate professionals.

Though outreach activities were conducted at a regional level, the majority of participants were from the City of Gainesville rather than Alachua County and surrounding communities. In the future, additional steps for advertising the community participation process could be to include flyers or inserts with utility bill mailings for the general population rather than just for public housing residents.

4. *Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

Community participation meetings for the AFH process were designed to solicit input from residents and stakeholders in a discussion forum. Discussion topics were focused around needs, barriers, and challenges related to housing (rental, homeownership, senior, disabled, homeless, public housing); affordability of housing; segregation of housing; supply of housing; access to opportunity (education,

employment, transportation, health); and fair housing outreach/education. A complete summary of comments discussed at the public/PHA meetings is included in this document as an attachment.

The AFH was published for a 45 day public comment period from October 16, 2017 to November 30, 2017, during which the public was encouraged to submit comments in accordance with the lead agency's Citizen Participation Plan.

Participants took into consideration all views and comments on the AFH, there were no comments that were not accepted.

III. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

The City of Gainesville adopted its previous Analysis of Impediments (AI) in September 2004. The AI identified nine impediments to fair housing choice based on a review of affordable housing needs, analysis of HMDA data, a housing market analysis, and other local knowledge.

Alachua County is not an Entitlement community, thus the county does not have a previous Analysis of Impediments. The County has conducted strategic planning exercises relevant to the issue of fair housing through the development of their Comprehensive Plan. The County's latest Comprehensive Plan, adopted in April 2011, includes goals and policies that address fair housing in the jurisdiction.

City of Gainesville

❖ Impediments Identified:

- 1) Lack of banks, lending, and real estate institutions in the Northeast and Southeast quadrants. These areas are predominantly minority and/or low- and moderate-income neighborhoods.
- 2) The HMDA data revealed that a majority of conventional home purchase loans, refinancing loans, and home improvement loans were originated in the Northwest and Southwest quadrants.
- 3) HMDA data revealed the fact that there is a geographic imbalance in the distribution of mortgage loans by local lending institutions. Northwest and Southwest quadrants have a larger share of mortgage investments than the Northeast and Southeast quadrants. People residing in the Northeast and Southeast quadrants have fewer chances to obtain mortgage loans than people in the Northwest and Southwest quadrants.
- 4) The HMDA data revealed the fact that there exists a gap of mortgage origination rates between minority and non-minority applicants.
- 5) The Gainesville area does not have an adequate supply of affordable housing units. The private sector is not producing an equal amount of affordable housing units compared with higher end market rate housing units.
- 6) The sample HMDA data revealed the fact that no loans were applied by or originated for middle or upper income residents in census tracts with high (greater than 50%) minority concentration.
- 7) The average denial rate for minority applicants based on the reason of credit history is higher than the minority applicants by the private financial institutions.

- 8) Credit history has become one of the major barriers to housing choices in Gainesville, as presented by the HMDA data and also as perceived by the civic groups and non-profit organizations, as well as rental managers and real estate agents.

❖ Objectives to Resolve Impediments:

- 1) The City of Gainesville and Alachua County governments should continue to improve linkages between transportation, employment, and a variety of housing choices. This can be accomplished by enacting and sustaining policies which encourage development that strengthens these linkages.
- 2) Ensure that all residents in the Gainesville urban area have equal access to lending resources and the private housing market regardless of income, ethnicity or geographic location of residency.
- 3) Develop a strong fair housing organizational structure in the Gainesville/Alachua County areas, which would investigate housing discrimination complaints, provide training to housing industry professionals, provide technical assistance and provide education to community and/or governmental organizations on fair housing issues.

Alachua County

❖ Goals and Objectives:

- 1) Promote safe, sanitary, and affordable housing for all Alachua County residents:
 - Provide for the development of affordable housing, dispersed throughout the County, through policies focusing on the following areas: land use and facilities; methods to promote the dispersion of affordable housing; manufactured housing.
 - The land development regulations shall be evaluated for their impacts on housing prices and periodically reviewed.
 - Ensure consistency of housing activities, and provide for the most effective methods for achieving its housing goals.
 - Ensure access to housing for all income levels of the population by providing funding for affordable housing activities.
- 2) Maintain and improve the existing supply of affordable housing, and provide for the redevelopment of neighborhoods.
 - Provide a systematic approach to the identification, preservation, and redevelopment of neighborhoods and existing affordable housing across the County.

- Promote construction and rehabilitation techniques that enhance the long-term usability and affordability of housing.
 - Provide funding for rehabilitation and redevelopment.
 - Ensure that the County's land development regulations are consistent and conducive to cost-effective redevelopment of neighborhoods.
- 3) Ensure access to housing opportunities for those residents with specialized housing needs.
- Provide access to housing opportunities for groups identified as having special needs.
 - Ensure that the land development regulations concerning the provision of housing for those with special needs comply, at a minimum, with the statutory requirements, and do not present barriers to the development of special needs housing.
 - Alachua County shall provide a dedicated funding source for the provision of Special Needs housing, and form partnerships with local advocacy groups or organizations providing such housing.

a. Discuss what progress has been made toward the achievement of fair housing goals.

City of Gainesville:

Objective #1: The City of Gainesville and Alachua County governments should continue to improve linkages between transportation, employment, and a variety of housing choices. This can be accomplished by enacting and sustaining policies which encourage development that strengthens these linkages.

In its FY 2017 – 2020 Local Housing Assistance Plan (LHAP), the City offers support for infill housing development, with the purpose of providing affordable homeownership opportunities for eligible homebuyers and to stabilize neighborhoods through the development of new affordable housing. These new units may be constructed on infill lots within the City, encouraging and improving access to transportation and employment opportunities.

The City also offers an allowance of flexibility in densities for affordable housing. This program awards points for desired design and development features, awarding points to development applications based on the features of the proposed development, with the intention of bolstering the supply of affordable housing in communities of opportunity.

The City maintains an inventory of City-owned lands available for affordable housing. This surplus lands inventory enables developers, city agencies, and nonprofit agencies the opportunity to develop cost-efficient land for the purposes of promoting affordable housing, particularly in areas with linkages to transportation and employment.

The City has specifically identified future land use and zoning maps to provide residential zoning near bus routes, major roads, mixed use areas, and employment centers. This strategy is codified in the City's comprehensive plan.

Areas in east Gainesville were identified as needing improved linkages to transportation, particularly transportation to the City's downtown and neighborhoods on the west side of town. The Regional Transit System (RTS), which operates bus service in the City, has multiple routes with coverage of areas in east Gainesville, increasing connections in east Gainesville to the City's downtown and areas west.

Objective #2: Ensure that all residents in the Gainesville urban area have equal access to lending resources and the private housing market regardless of income, ethnicity or geographic location of residency.

Of particular interest related to improving equal access to lending resources and the private housing market for all City residents regardless of income, ethnicity or location, is the City's policy of offering downpayment assistance to very-low, low-, and moderate-income borrowers. This program is codified in the City FY 2017 – 2020 LHAP. The program provides downpayment/closing cost assistance to eligible first-time low-income homebuyers.

The City also offers mortgage foreclosure intervention funding (a maximum of \$5,000 to each recipient) in its FY 2017 – 2020 LHAP. This program provides assistance to eligible homeowners to prevent foreclosure and retain homeownership of their homes. Eligible expenses for the program include: delinquent mortgage payments, attorney's fees, late fees and other customary fees.

Objective #3: Develop a strong fair housing organizational structure in the Gainesville/Alachua County areas, which would investigate housing discrimination complaints, provide training to housing industry professionals, provide technical assistance and provide education to community and/or governmental organizations on fair housing issues.

The City's Office of Equal Opportunity (OEO) is responsible for responding to, and monitoring, fair housing complaints, promoting fair housing awareness, and providing outreach and technical assistance to the broader community on fair housing and equal opportunity issues within the City. The OEO has championed a series of initiatives aimed at promoting awareness of equal opportunity barriers in the community, and fostering a dialogue of mutual respect, awareness, and participation between residents of all socioeconomic backgrounds across the City.

The City supports a program called Dismantling Prejudices and Biases Initiative. This program, created in 2010, is an effort to address the issue of racism, particularly institutional racism, and the impact racism has had on neighborhoods across the region. This program recruits citizens to serve as subject matter experts on a variety of topics, from transportation, education, healthcare, and economic development, and the impact of racism on each sector.

Alachua County:

Goal #1: Promote safe, sanitary, and affordable housing for all Alachua County residents.

In its 2017-2020 LHAP, the County offers funding for owner-occupied rehabilitation. This strategy is intended to award funds to households in need of repairs to correct code violations, health and safety issues, electrical, plumbing, roofing, heating and cooling, accessibility, and weatherization upgrades. Up to \$20,000 is available for each award, exclusively for very low, and low-income households.

Also in its 2017-2020 LHAP, the County offers foreclosure prevention funding, with a maximum award up to \$4,000 to very low, and low-income households. These funds can be used for homeowners to bringing mortgage payments current prior to the start of a foreclosure process, with payments made directly to the lending institution.

The County offers eviction prevention funding for very low-income households, up to \$3,000. These SHIP funds are awarded to renters in need of one-time payment assistance for rental payments in arrears. These funds can only be awarded to prevent homelessness, thus supporting safe, sanitary affordable housing options for at-risk families in the County.

The table below presents data on the County's efforts around down-payment assistance, owner-occupied rehabilitation, and security and utility deposit assistance by race/ethnicity.

Table 3 Alachua County Affordable Housing Accomplishments							
Description	White	Black	Hispanic	Asian	American Indian	Other	Total
DP Assistance with Rehab	1						1
Owner-Occupied Rehab	2	21					23
Security and Utility Deposit	2	23					25
TOTAL	5	44					49
<i>Source: Alachua County 2016 SHIP Annual Report</i>							

Goal #2: Maintain and improve the existing supply of affordable housing, and provide for the redevelopment of neighborhoods.

The County offers rental assistance to very-low income households that are in need of rent payments to assist with obtaining a lease on a rental unit, including security and utility deposits, and rent equal to 12 months of rent. These funds ensure very low-income households are able to maintain affordable and stable rental housing.

The County also recognizes the importance of promoting affordable housing rental development, and offers SHIP funds up to \$50,000 for developments over 50 units. The funds are intended to be used as gap financing, as required by each project. Additionally, these funds are typically awarded to developers who have accessed federal or state subsidies for the development, or to meet local government contribution requirements.

Acknowledging the impact that some land development codes and regulations may have on housing affordability, the County has instituted a policy in its Unified Land Development Code (ULDC) Chapter 402.05(a)17 to regularly review of local policies, ordinances, regulations, and comprehensive plan provisions that significantly increase the cost of housing in the County. This regulatory review ensures maximum efficiency, and is intended to remove regulatory barriers to the provision of affordable housing.

Goal #3: Ensure access to housing opportunities for those residents with specialized housing needs.

The County offers SHIP funds up to \$100,000 for developments with 50 or fewer units that include special needs units. These funds recognize the absolute importance of bolstering the supply of affordable housing for persons with special needs.

Additionally, the County prioritizes families with special needs by ranking these families first in its SHIP award waiting list. This policy, written in the County's 2017-2020 LHAP, codifies the high priority the county assigns to the need for special needs families to access affordable housing in the County.

Finally, the County's comprehensive plan identifies specific actions it will execute to ensure housing opportunities for residents with special housing needs. Included in these actions are: reviewing development regulations to ensure farmworker housing needs are addressed, providing adequate sites in areas of residential character for group homes and foster care facilities, and promoting access to opportunities for special needs populations by encouraging residential living patterns near transit hubs and activity centers.

b. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).

The City of Gainesville and Alachua County have worked hard to address impediments to fair housing choice, and meet past goals identified in the City's Analysis of Impediments and the County's comprehensive plan. These efforts have been successful, although there are some challenges still remaining.

For the City and County, there remain challenges in connecting low-income households, particularly for the protected classes of race/ethnicity and national origin, to opportunities in transportation, employment and a range of affordable housing options. While the City and County have endeavored to encourage affordable housing development in higher density, connected communities, these efforts simply have struggled to meet natural demand. Given more resources, the City and County would be better equipped to address these challenges. Additionally, the great recession starting in 2008,

originating in the housing market, disproportionately eliminated household wealth in African American households, a trend which extends to Alachua County and Gainesville.

c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

The City has identified a number of challenges in its programs to support affordable housing development in areas of opportunity. For instance, the City allows for flexibility in densities for affordable housing, but the program has faced practical challenges in implementation. One concern is that the density bonus program does not specifically define “affordable,” resulting in lengthy discussions to detail the definition on a project-by-project basis. A second concern with the program is that the program does not explicitly state the percentage of units that must be affordable for a project to earn bonus points.

In addition to the practical challenges for the City’s density bonus program mentioned above, the program also suffers from lower than expected rates of use. Developers simply are not taking advantage of the program, primarily because the City’s standing density is high enough that the density bonuses are not attractive to developers.

The City could address these challenges through a number of steps, including a form based zoning code for a portion of the City. The City is considering this measure through revisions to its ULDC. Rather than a density bonus, the form based code would allow for a height bonus to encourage development of affordable housing.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The previous goals for both the City of Gainesville and Alachua County did not include specific metrics, milestones, or timeframes. For this AFH, the program participants defined the parameters for success in order to track progress throughout the implementation period. This will allow for a better evaluation of the effectiveness of programs and actions to address the fair housing issues as well as to reassess conditions and identify any changes in the region that would warrant a revision to the AFH.

The City, County, GHA, and ACHA developed this AFH’s goals based on the availability of resources knowing that the level of resources available plays a key role in successfully implementing the strategies to overcome the fair housing issues.

IV. Fair Housing Analysis

A. Demographic Summary

1. *Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*

The demographic profile of the City of Gainesville and the Alachua County - Gainesville CBSA (region) will describe current demographics as well as demographic trends between 1990 and 2010. The demographic profile includes an overview of the total population, number of persons by race/ethnicity, national origin including limited English proficiency (LEP) population, disability, sex, age, and families with children.

Table 4 Demographics						
City of Gainesville				Alachua County – Gainesville CBSA		
Race/Ethnicity	#			#		
White, Non-Hispanic	72,753	58.09%		172,348	65.22%	
Black, Non-Hispanic	28,042	22.39%		50,304	19.03%	
Hispanic	12,413	9.91%		21,597	8.17%	
Asian or Pacific Islander, Non-Hispanic	8,434	6.73%		13,280	5.03%	
Native American, Non-Hispanic	280	0.22%		666	0.25%	
Two or More Races, Non-Hispanic	2,875	2.30%		5,365	2.03%	
Other, Non-Hispanic	437	0.35%		715	0.27%	
National Origin						
#1 country of origin	China excl. Hong Kong & Taiwan	1,609	1.34%	China excl. Hong Kong & Taiwan	2,304	0.91%
#2 country of origin	India	1,422	1.18%	India	1,838	0.73%
#3 country of origin	Cuba	848	0.70%	Cuba	1,644	0.65%
#4 country of origin	Colombia	756	0.63%	Philippines	1,221	0.48%
#5 country of origin	Jamaica	645	0.54%	Mexico	1,149	0.46%
#6 country of origin	Haiti	635	0.53%	Colombia	1,071	0.42%
#7 country of origin	Mexico	566	0.47%	Korea	1,057	0.42%
#8 country of origin	Philippines	549	0.46%	Jamaica	1,055	0.42%
#9 country of origin	Brazil	547	0.45%	Canada	1,013	0.40%
#10 country of origin	Canada	540	0.45%	Haiti	866	0.34%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	1,711	1.42%	Spanish	3,442	1.36%
#2 LEP Language	Chinese	1,060	0.88%	Chinese	1,186	0.47%
#3 LEP Language	Vietnamese	286	0.24%	Korean	743	0.29%
#4 LEP Language	Korean	252	0.21%	Vietnamese	590	0.23%
#5 LEP Language	Hindi	168	0.14%	Japanese	346	0.14%
#6 LEP Language	Arabic	167	0.14%	Tagalog	337	0.13%
#7 LEP Language	Portuguese	160	0.13%	Portuguese	298	0.12%
#8 LEP Language	Tagalog	135	0.11%	French Creole	232	0.09%
#9 LEP Language	Other Asian Language	130	0.11%	Arabic	221	0.09%
#10 LEP Language	Other Indic Language	113	0.09%	Hindi	206	0.08%
Disability Type						
Hearing difficulty		2,663	2.25%		7,997	3.22%
Vision difficulty		2,079	1.76%		5,626	2.27%

Table 4 Demographics				
City of Gainesville			Alachua County – Gainesville CBSA	
Race/Ethnicity	#	%	#	%
Cognitive difficulty	4,827	4.08%	11,028	4.44%
Ambulatory difficulty	5,712	4.83%	15,830	6.38%
Self-care difficulty	2,363	2.00%	6,122	2.47%
Independent living difficulty	3,888	3.29%	10,432	4.20%
Sex				
Male	60,518	48.32%	128,622	48.67%
Female	64,716	51.68%	135,653	51.33%
Age				
Under 18	17,077	13.64%	47,916	18.13%
18-64	97,880	78.16%	186,876	70.71%
65+	10,277	8.21%	29,483	11.16%
Family Type				
Families with children	8,433	40.21%	23,727	41.01%
<i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.</i> <i>Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.</i> <i>Note 3: Data Sources: Decennial Census; ACS</i> <i>Note 4: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

Table 5 Demographic Trends								
City of Gainesville								
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	72,605	73.08%	78,259	65.89%	72,753	58.09%	72,753	58.09%
Black, Non-Hispanic	18,207	18.33%	24,671	20.77%	29,383	23.46%	28,042	22.39%
Hispanic	4,592	4.62%	8,330	7.01%	12,413	9.91%	12,413	9.91%
Asian or Pacific Islander, Non-Hispanic	3,570	3.59%	6,347	5.34%	9,574	7.64%	8,434	6.73%
Native American, Non-Hispanic	152	0.15%	576	0.48%	626	0.50%	280	0.22%
National Origin								
Foreign-born	7,956	8.01%	10,846	9.13%	14,512	11.59%	15,831	12.64%
LEP								
Limited English Proficiency	3,213	3.23%	4,315	3.63%	5,142	4.11%	5,025	4.01%
Sex								
Male	48,950	49.27%	57,808	48.67%	60,518	48.32%	60,518	48.32%
Female	50,395	50.73%	60,961	51.33%	64,716	51.68%	64,716	51.68%

**Table 5
Demographic Trends**

Age									
Under 18	18,035	18.15%	20,594	17.34%	17,077	13.64%	17,077	13.64%	
18-64	72,431	72.91%	88,081	74.16%	97,880	78.16%	97,880	78.16%	
65+	8,879	8.94%	10,093	8.50%	10,277	8.21%	10,277	8.21%	
Family Type									
Families with children	9,391	47.27%	8,337	45.07%	8,433	40.21%	8,433	40.21%	
Alachua County – Gainesville CBSA									
		1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity		#	%	#	%	#	%	#	%
White, Non-Hispanic	144,320	75.44%	164,612	70.83%	172,348	65.22%	172,348	65.22%	
Black, Non-Hispanic	34,897	18.24%	43,992	18.93%	52,801	19.98%	50,304	19.03%	
Hispanic	6,901	3.61%	12,880	5.54%	21,597	8.17%	21,597	8.17%	
Asian or Pacific Islander, Non-Hispanic	4,451	2.33%	8,637	3.72%	15,092	5.71%	13,280	5.03%	
Native American, Non-Hispanic	334	0.17%	1,345	0.58%	1,595	0.60%	666	0.25%	
National Origin									
Foreign-born	10,803	5.65%	16,147	6.95%	25,383	9.60%	27,271	10.32%	
LEP									
Limited English Proficiency	4,397	2.30%	6,515	2.80%	9,161	3.47%	9,147	3.46%	
Sex									
Male	93,921	49.11%	113,568	48.87%	128,622	48.67%	128,622	48.67%	
Female	97,342	50.89%	118,824	51.13%	135,653	51.33%	135,653	51.33%	
Age									
Under 18	41,910	21.91%	49,859	21.45%	47,916	18.13%	47,916	18.13%	
18-64	131,244	68.62%	159,822	68.77%	186,876	70.71%	186,876	70.71%	
65+	18,109	9.47%	22,711	9.77%	29,483	11.16%	29,483	11.16%	
Family Type									
Families with children	21,294	48.37%	18,391	46.30%	23,727	41.01%	23,727	41.01%	
<i>Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.</i> <i>Note 2: Data Sources: Decennial Census; ACS</i> <i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i>									

City of Gainesville

Current Demographics

Based on 2010 U.S. Census data presented in Table 4, the total population of the City of Gainesville is 125,234 persons. The racial composition of the City is 58.09% White and the following minority racial/ethnic groups makeup the rest of the population: 22.39% African American, 9.91% Hispanic, 6.73% Asian or Pacific Islander, 0.22% Native American, 2.30% Multi-racial, and 0.35% Other. The Florida Housing Data Clearinghouse (FHDC) provides data on Florida's housing needs and supply, subsidized rental housing, and household demographics and has more current demographic data. According to the FHDC, Gainesville's population in 2016 was 128,611 persons or 53,146 households. FHDC also provides population projections and the population in Gainesville is projected to grow by 3.40% (0.85% per year) between 2016 and 2020 to 132,984 persons.

Gainesville has a large student population because it is home to one of the largest state universities in the country, the University of Florida (UF). In 2016, there were 52,286 students registered at the university including 5,169 international students. The racial/ethnic composition of the student body is 58.10% White, 6.50% African American, 21.00% Hispanic, 7.90% Asian or Pacific Islander, and less than 1.00% Native American.

Approximately 6.70% of the population in Gainesville are foreign-born (born outside the United States). The top three countries of origin are China, India, and Cuba. About 3.50% of the population are LEP persons, defined as persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English. Given the key countries of origin, the top LEP languages include Spanish and Chinese. Although India is the second most common country of origin, Hindi, the most widely spoken language in parts of India, is fifth on the list of LEP languages. This is most likely due to English being the second most widely spoken language in India.

In regards to disability, 18.20% of the total population report having a disability. Federal law defines a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having an impairment". In the jurisdiction, 4.83% of the population report having an ambulatory difficulty, 4.08% have a cognitive difficulty, 3.29% have an independent living difficulty, 2.25% have a self-care difficulty, and 1.76% have a vision difficulty.

Other data on household composition indicates that females account for 51.68% of the population and males, 48.32%. Approximately 78.16% of the population is between the ages of 18-64 and 8.21% of the population is elderly. The remainder of the population, 13.64%, is under 18 years of age. There are 8,433 or 40.21% families with children in the jurisdiction.

Demographic Trends

The data in Table 5 shows the demographic trends for Gainesville from 1990 to 2010. During that time, the population increased by 25.84% (1.29% per year) with most of the growth occurring between 1990 and 2000 due to the annexation of significant land areas and population into the City of Gainesville as well as an increase in enrollment at UF. In regards to changes in the racial composition of the City

between 1990 and 2010, all the racial/ethnic groups increased in size but at significantly different rates. The Native American population grew at the fastest rate, 15.59% per year, however this group comprises a small proportion of the City's population. The Hispanic population grew at the second fastest rate at 8.52% per year. The White population had the slowest growth rate of all the racial/ethnic groups, growing at only 0.01% per year. The White population was also the only group to decline in size during the 20-year period when there was a 7.04% decrease in the size of the population between 2000 and 2010 almost erasing the entire 7.79% growth in this population in the previous decade.

As the City's population has grown, the foreign-born population almost doubled between 1990 and 2010. The number of foreign-born persons grew from 7,956 persons in 1990 to 14,512 persons in 2010, an 82.4% increase. Based on the total population growth between 1990 and 2010 and the change in the foreign-born population during the same period, approximately a quarter of the growth in the City can be attributed to persons originating from other countries. The growth in the number of LEP persons has also outpaced the total population growth. Between 1990 and 2010, the number of LEP persons increased by 60.0% from 3,213 to 5,142 persons.

The population data trends by sex, age, and family type shows that the female population has grown at a faster rate than the male population increasing by 28.40% between 1990 and 2010 compared to a 23.60% growth rate for men. The elderly population increased by 15.75% and the population between the ages of 18-64 increased by 35.14% while persons under age 18 decreased by 5.31%. The number of families with children declined by 10.20% between 1990 and 2010 after a decrease of 11.22% between 1990 and 2000 and a slight increase of 1.15% between 2000 and 2010.

Alachua County - Gainesville CBSA

Current Demographics

The Gainesville CBSA is comprised of Alachua and Gilchrist counties. Based on the data in Table 4, the total population of the two-county area is 264,275 persons. The share of the population between the two counties is approximately 247,336 (93.60%) residing in Alachua County and 16,939 (6.40%) in Gilchrist County. As of the 2010 U.S. Census, the racial/ethnic makeup of the region is 65.22% White, 19.03% African American, 8.17% Hispanic, 5.03% Asian/Pacific Islander, 0.25% Native American, 2.03% Multi-racial, and 0.27% Other.

According to the FHDC, as of 2016, the population in the region increased to 273,909 persons or 112,725 households. Alachua County's population increased from 247,336 in 2010 to 257,063 in 2016, an increase of 3.93% (0.66% per year). In Gilchrist County, the population decreased by 0.55% (0.14% per year) from 16,939 to 16,846 for the same time period. The population in the region is projected to grow by 3.32% (0.83% per year) between 2016 and 2020 to 282,994 persons.

Like Gainesville, the top countries of origin in the region are China, India, and Cuba. The foreign-born population represents 5.20% of the total population. Approximately 3.00% of the population are LEP persons and the top LEP languages are Spanish and Chinese. Korean, Vietnamese, and Japanese round out the top five most popular languages. Hindi, the 5th LEP language in Gainesville is 10th in the region.

Over 23.00% of the population report a disability with 6.38% reporting an ambulatory difficulty, 4.44% a cognitive difficulty, 4.20% an independent living difficulty, 3.22% a hearing difficulty, 2.47% a self-

care difficulty, and 2.27% a vision difficulty. The FHDC reported that in 2015, 16.10% of Alachua County households included a household member with a disability.

In regard to sex, there are more women than men in the region. Females account for 51.33% of the population and males, 48.67%.

Approximately 70.71% of the population is between the ages of 18-64 and 11.16% of the population is elderly. The remainder of the population, 18.13%, is under 18 years of age.

Of the family households in the region, 23,727 families or 41.01% are families with children.

Demographic Trends

The population in the region grew at a slightly faster rate than the jurisdiction, increasing by 37.99% (1.90% per year) between 1990 and 2010 as shown in Table 5. Like Gainesville, minorities had the greatest increase in population size. Specifically, Native Americans grew at an annual rate of 18.88%, followed by Asian or Pacific Islanders at 11.95%, Hispanics at 10.65%, and African Americans at 2.57%. The White population had the slowest growth rate increasing by only 0.97% per year.

In regards to national origin, the foreign-born population in the region increased from 10,803 persons in 1990 to 25,383 persons in 2010. This represents a growth rate of 6.7% per year. To put the growth of the foreign-born population in perspective, natural born citizens grew at a rate of 1.6% per year during the same time period. The number of LEP persons doubled between 1990 and 2010 and grew at an annual rate of 5.42%.

The population data trends by sex, age, and family type indicate that the male population grew at a slightly faster rate than the female population, 39.95% versus 36.36%. The elderly population in the region increased by 62.81% while the population between the ages of 18-64 increased by 42.39% and the population under 18 years of age increased by 14.33%. The number of families with children declined by 13.63% between 1990 and 2000 but increased by 29.01% between 2000 and 2010 for an overall increase of 11.43% during the 20-year period.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

Segregation is defined in the AFFH rule as a condition where there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. Integration, on the other hand, means that there is not a high concentration of protected class persons in a particular geographic area when compared to a broader geographic area.

The level of residential segregation can be measured by a dissimilarity index. A dissimilarity index assesses the degree to which two groups are evenly distributed across the jurisdiction or region. The dissimilarity index value ranges from 0 to 100, where a higher number indicates a higher degree of segregation among the two groups being measured. Table 3, depicts the current and past race/ethnicity dissimilarity index values for the non-white/White, Black/White, Hispanic/White, and Asian or Pacific Islander/White populations in Gainesville and the Alachua County – Gainesville CBSA. Dissimilarity index values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high segregation.

Table 6 Racial/Ethnic Dissimilarity Trends								
	City of Gainesville				Alachua County – Gainesville CBSA			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	34.64	31.01	29.82	34.04	29.45	30.82	31.11	35.68
Black/White	46.07	45.16	39.73	47.91	38.43	41.12	40.70	47.79
Hispanic/White	18.53	19.71	22.02	22.48	21.04	22.61	22.42	24.77
Asian or Pacific Islander/White	34.40	29.21	34.38	37.66	37.44	34.31	36.23	42.56
<i>Note 1: Data Sources: Decennial Census</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>								

City of Gainesville

Based on the data in Table 6, the non-White/White dissimilarity index is low for Gainesville at 34.04. This represents a low degree of segregation between minorities and white individuals. African Americans are the racial/ethnic group experiencing the highest level of segregation as indicated by the Black/White dissimilarity index value of 47.91. This represents moderate segregation between African American and White individuals. Both Hispanic and Asian or Pacific Islanders experience low degrees of segregation at 22.48 and 37.66, respectively.

Alachua County – Gainesville CBSA

The dissimilarity index values for Gainesville and the region are similar however, overall segregation is slightly higher in the region than the City. The non-White/White dissimilarity index for the region is low at 35.68. The Black/White dissimilarity index is also highest in the region at 47.79, indicating moderate segregation. The Hispanic/White dissimilarity index is 24.77 which indicates low segregation. The Asian or Pacific Islander/White dissimilarity index is 42.56, falling within the moderate segregation level however, this value is skewed due to the small proportion of the region's population that is Asian or Pacific Islander.

- b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*

City of Gainesville

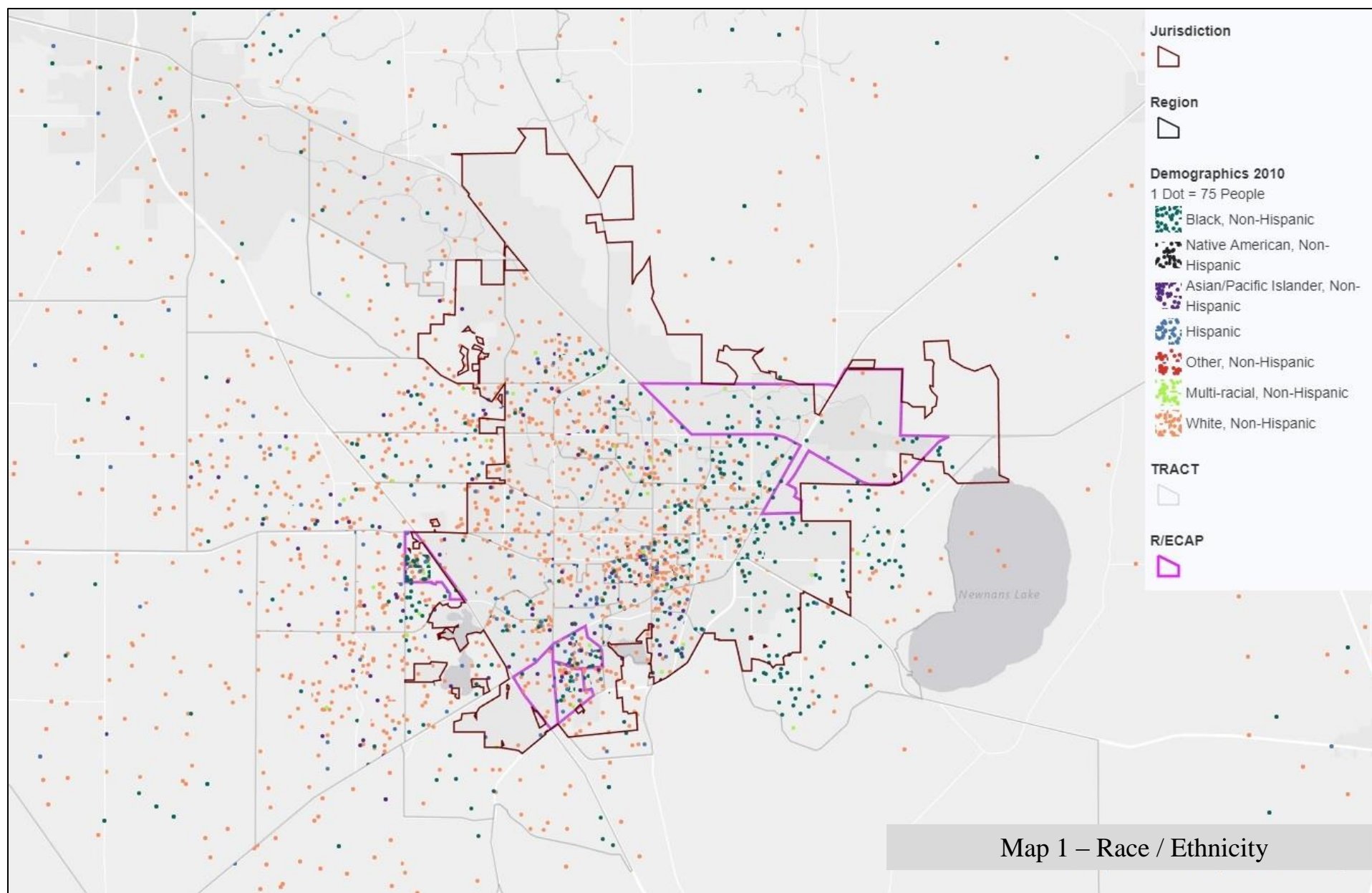
To identify the areas in the jurisdiction and region with high segregation and integration, maps 1, 2, and 3 were used to detect clusters by race/ethnicity, national origin, and LEP groups. Map 1 shows the current race/ethnicity data and indicates that there is a concentration of African Americans in the eastern part of the City (primarily east of Main Street) in an area known as East Gainesville. The western part of the City (west of US 441 and north of University Ave.) is predominantly occupied by White individuals while the southern part of the City (south of University Ave.) is more integrated and includes mostly White, Black, and Hispanic individuals.

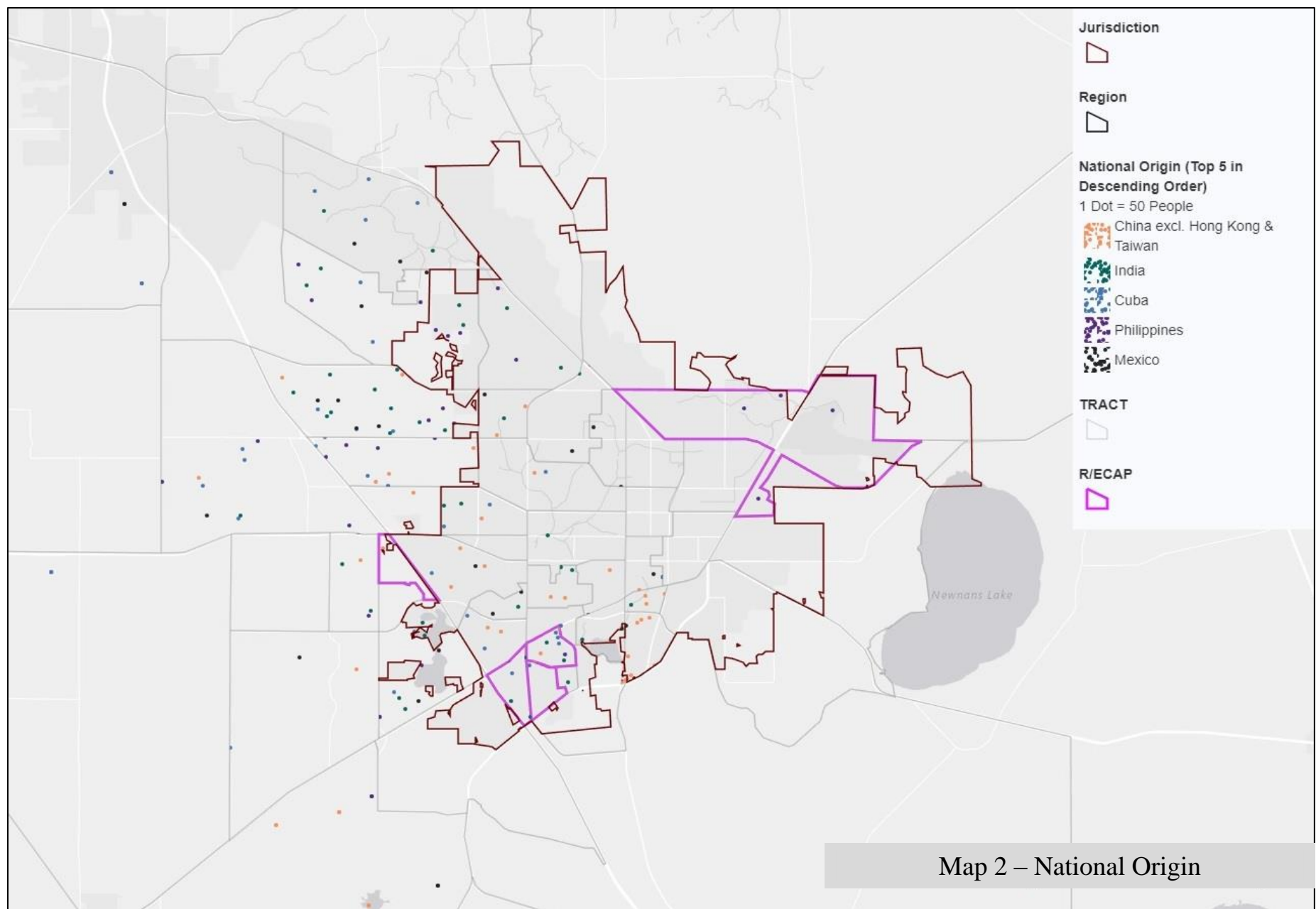
Map 2 shows the location of the five most populous national origin groups: China, India, Cuba, Colombia and Jamaica. The majority of the foreign-born population reside in the southern part of the City (south of University Drive).

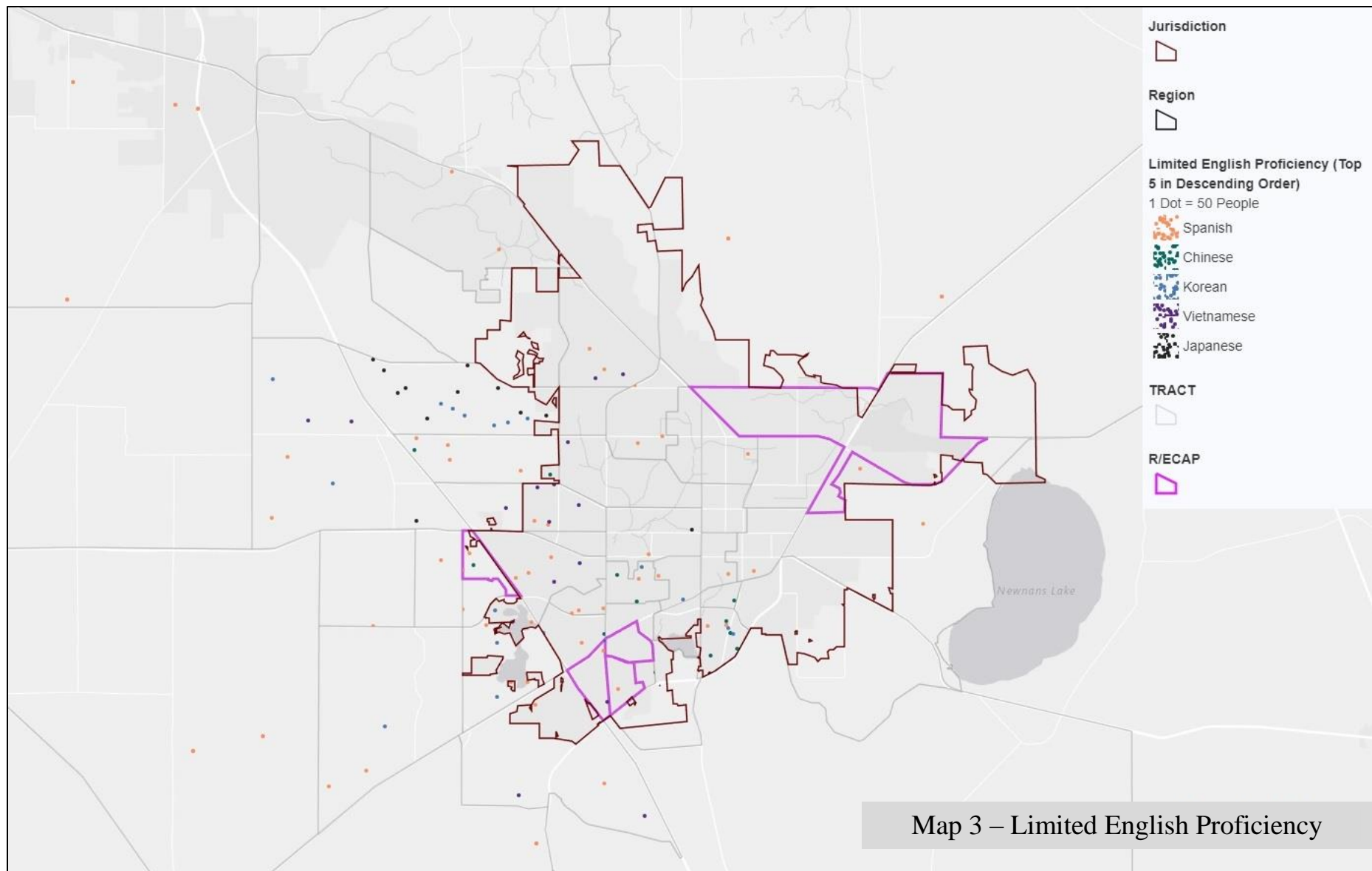
Map 3 shows the location of the LEP population. Spanish speakers are widely distributed throughout the City while speakers of the other top languages: Chinese, Vietnamese, Korean, and Hindi, reside in the southern part of the City which is consistent with the concentration of foreign-born persons.

Alachua County – Gainesville CBSA

Almost half of the population in the region reside in the City of Gainesville and the other half of the population is widely dispersed in the unincorporated areas of Alachua County and Gilchrist County as well as in the municipalities of Alachua, Archer, Hawthorne, High Springs, La Crosse, Micanopy, Newberry, Waldo, Bell, Fanning Springs, and Trenton. Maps 1, 2, and 3 indicates that there are no areas of racial/ethnic or national origin concentration outside of Gainesville.







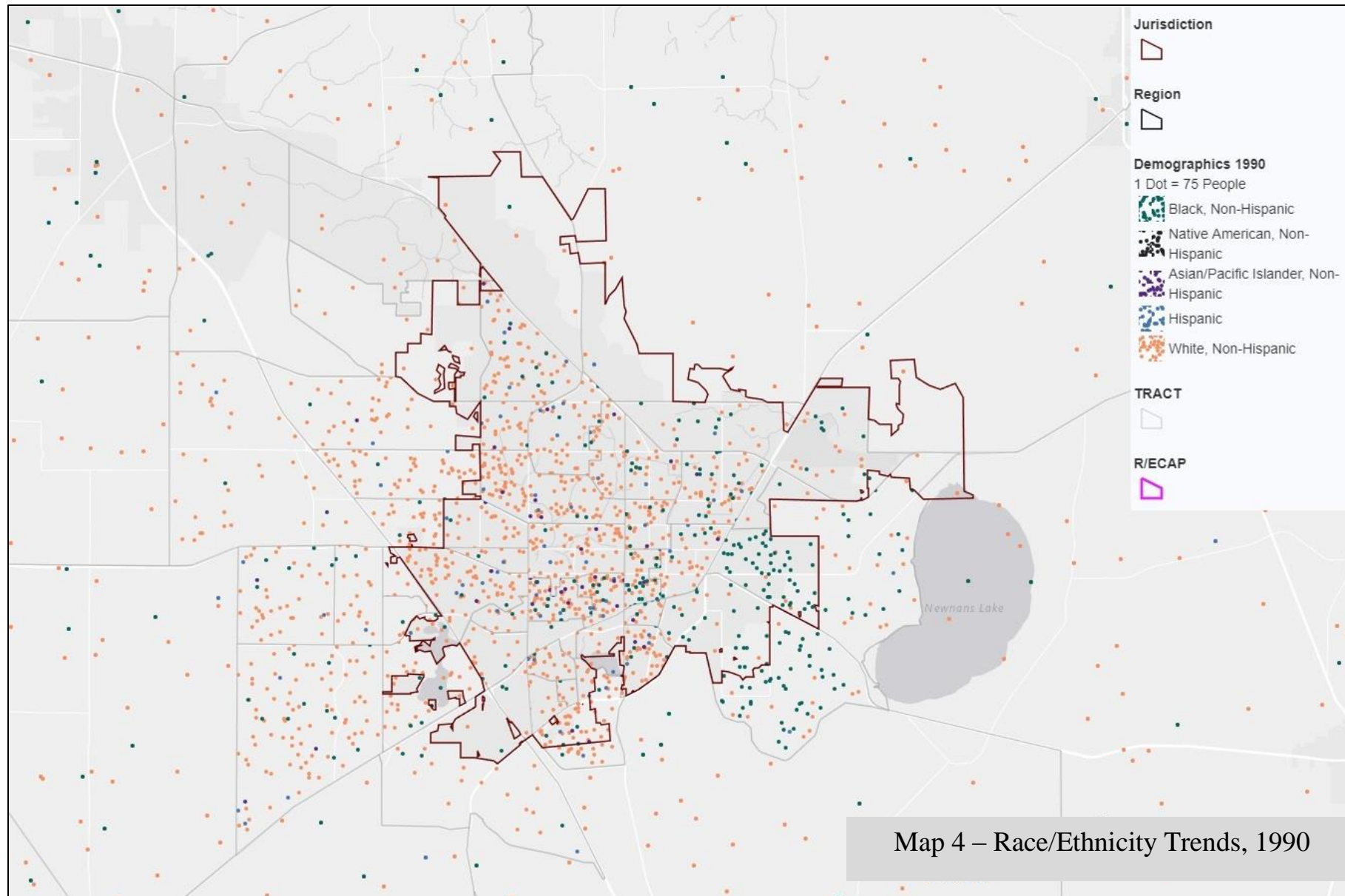
- c. *Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).*

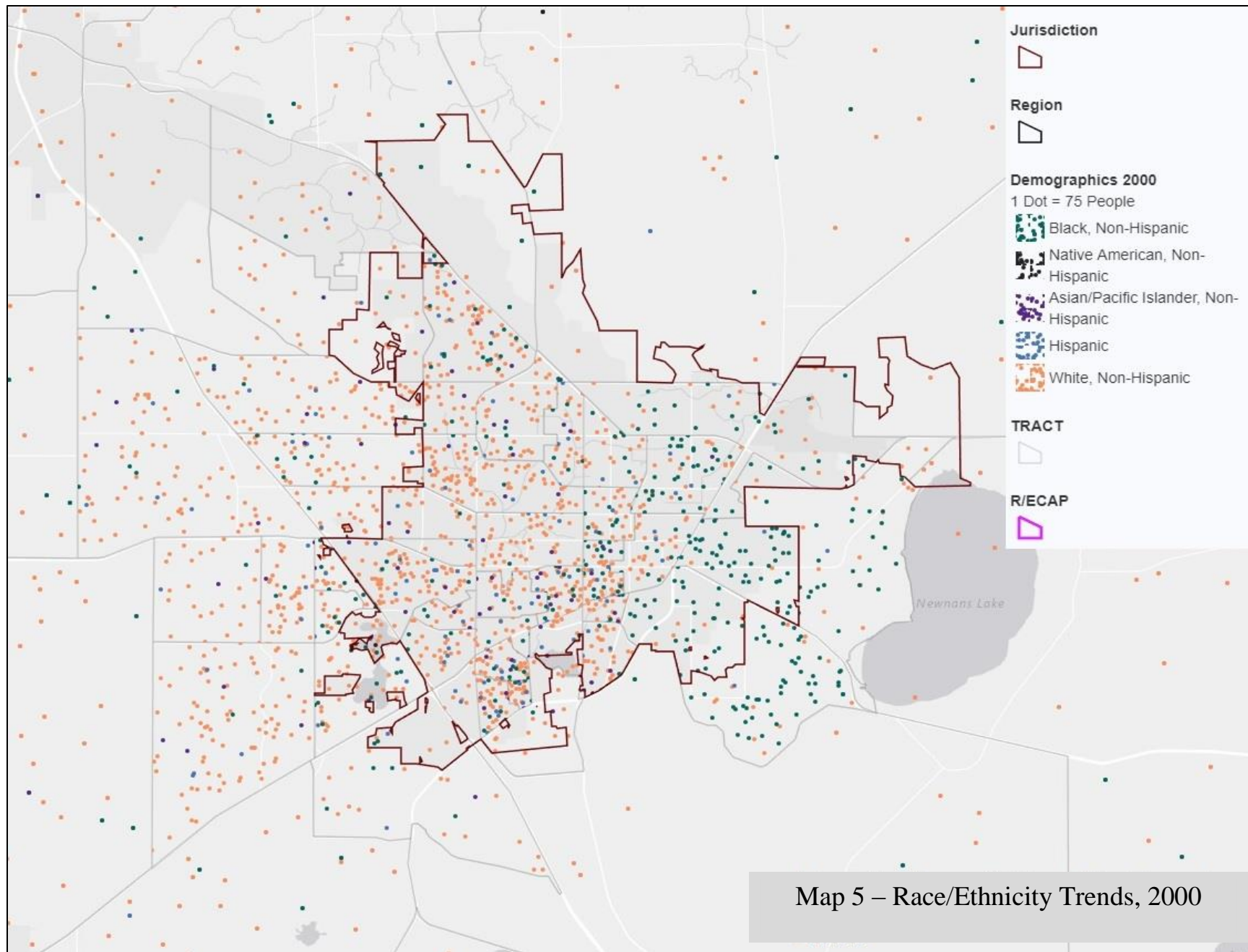
City of Gainesville

The non-White/White dissimilarity index in Gainesville is low and has steadily been decreasing since 1990. The Black/White dissimilarity index is the highest among the racial/ethnic groups however, it has also been decreasing since 1990. Unlike the decrease in the non-White/White dissimilarity index and the Black/White dissimilarity index, the Hispanic/White dissimilarity index has been gradually increasing from 18.53 in 1990 to 22.02 in 2010. The Asian or Pacific Islander/White dissimilarity index decreased between 1990 and 2000 from 34.40 to 29.21 but increased to almost 1990 levels in 2010, reaching 34.38. Based on past trends, overall segregation has decreased between 1990 and 2010 but increased for Hispanic/White segregation. Maps 4, 5, and 6 depict residential living patterns over time and indicates that the segregated and integrated areas in the jurisdiction have remained constant. That is, East Gainesville and west Gainesville has remained segregated through the years and predominantly occupied by African Americans in the east and White individuals in the west.

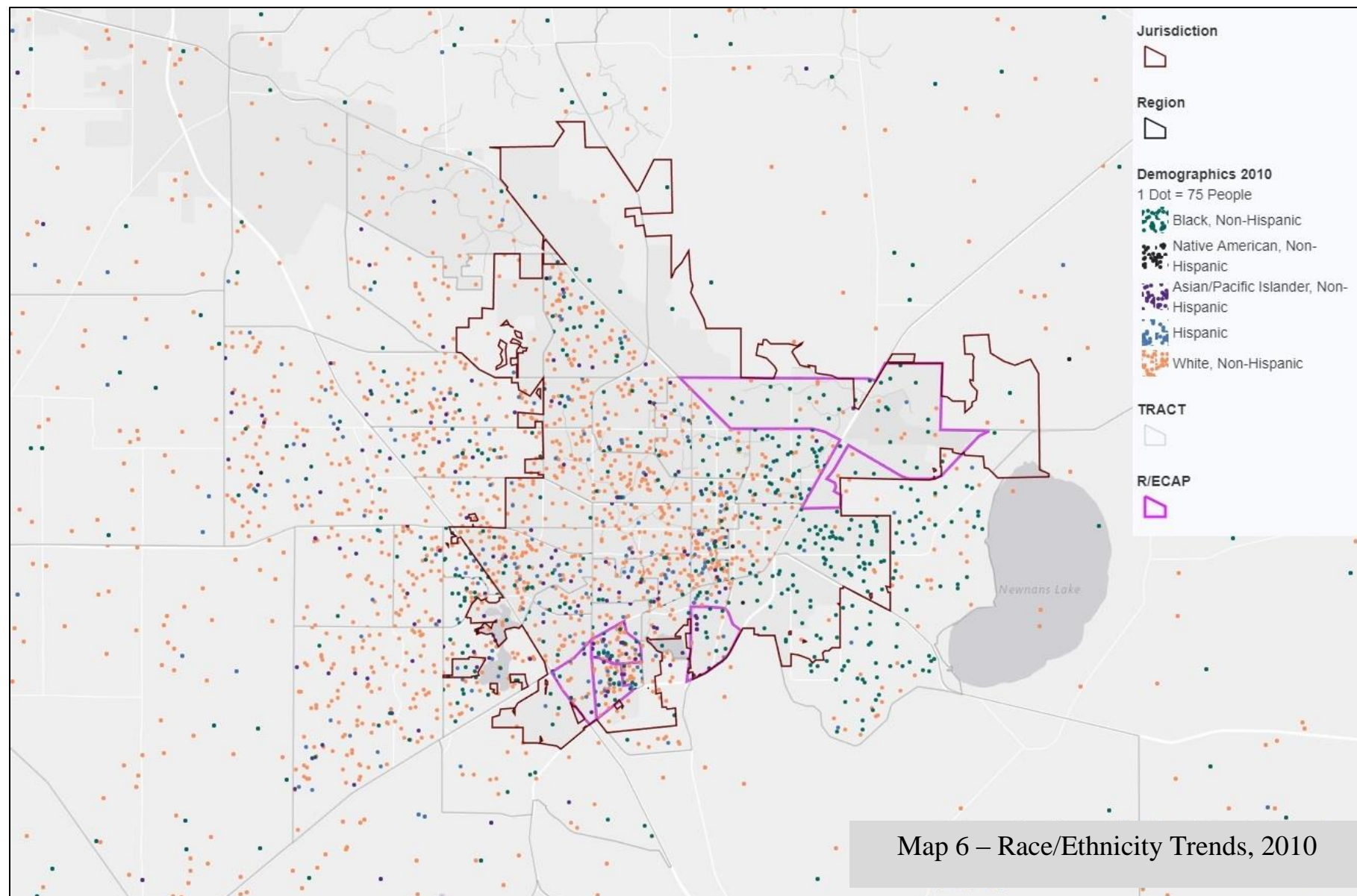
Alachua County – Gainesville CBSA

Segregation levels in the region has been increasing based on the non-White/White dissimilarity index values which was 29.45 in 1990 and rose to 31.11 in 2010. Like Gainesville, the group experiencing the highest levels of segregation in the region are African Americans. In 1990, the Black/White dissimilarity index was 38.43 and increased to 41.12 in 2000. Between 2000 and 2010, the Black/White dissimilarity index decreased to 40.70. Although there was a decrease in 2010, Black/White segregation moved from low segregation to moderate segregation over the two-decade period. Hispanic/White segregation followed a similar pattern as Black/White segregation, increasing in 2000 to 22.61 up from 21.04 in 1990 and decreasing slightly to 22.42 in 2010. Hispanic/White segregation has however remained low over the years. The Asian or Pacific Islander/White dissimilarity index is decreasing, falling from 37.44 in 1990 to 36.23 in 2010.





Map 5 – Race/Ethnicity Trends, 2000



- d. *Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.*

City of Gainesville

Current location of owner-occupied and renter-occupied housing:

Map 7 and 8 show the location of owner-occupied and renter-occupied housing in the jurisdiction and region. Owner-occupied housing is primarily located in the northern part of the City and in west Gainesville.

- ❖ Areas with the highest percentage of households who are owners (>82.00%) include:
 - The NW corner of the City (west of NW 43rd Street and north of NW 53rd Ave) including the neighborhood of Ashton; and
 - The area to the east of the Gainesville Regional Airport.
- ❖ Areas with moderate percentage of households who are owners (70.01% - 82.00%) include:
 - The area to the east of NW 43rd Street and north of NW 53rd Ave; and
 - A portion of the area bounded by NW 39th Ave on the north, NW 8th Ave to the south, US 441 on the east, and as far as the City boundaries to the west (comprising the Madison Part, Suburban Heights, Landmark Woods, Kingswood Court, Northwest Estates, Libby Heights, Shadow Lawn Estates, Las Pampas, Edgewood Hills, and Royal Gardens neighborhoods).

Renter-occupied housing is primarily located in the southern part of the City where students represent the largest group of renters:

- ❖ Areas with the highest percentage of households who are renters (>73.00%) include:
 - University of Florida and the area south of the university; and
 - The corridor between US 441 and Downtown Gainesville (including Pine Park, Gateway Park, Oakview, Fifth Ave, and Kirkwood neighborhoods).
- ❖ Areas with moderate percentage of households who are renters (47.01% - 73.00%) include:
 - Portions of East Gainesville (including Cedar Grove, Duval Heights, Northeast Neighbors, Duckpond, and Forest Ridge neighborhoods);
 - Waldo Road Corridor/Ironwood (comprised of Ironwood Golf Course and Gainesville Regional Airport);
 - The area immediately north of UF (including Ridgewood, Mason Manor, Raintree, University Park, Black Acres, and Hibiscus Park neighborhoods); and

- US 441, north of NE 43rd Street (including Stephen Foster, Hazel Heights, and Ridgeview neighborhoods).

Areas of segregation by race/ethnicity, national origin, and LEP include East Gainesville and the western part of the City. Owner-occupied housing is largely located in the western/northern areas of the City which is segregated and predominantly occupied by White individuals. Conversely, renter-occupied housing located near UF and the surrounding area as well as along the US 441 corridor are in the more integrated areas of the City. Rental housing located in East Gainesville is in a segregated area where the predominant group living in the area is African Americans.

Geographic patterns in the location of owner-occupied and renter-occupied housing:

Historically, Gainesville has had a higher percentage of renter-occupied units which can be partially attributed to the size of the student population that lives off UF's campus. According to a Comprehensive Housing Market Analysis (CHMA) report prepared by HUD's Office of Policy Development and Research (PD&R) in 2007, during the 1990s, owner-occupied households grew at a faster rate than renter households and remained steady in 2000 while the growth of rental households slowed after 2000. The decrease in the level of renter household growth was partly attributed to stable enrollment at UF and the construction of dormitories on campus. Another factor for the decrease was lower mortgage interest rates that fueled homeownership.

The homeownership rate in 2000 was 47.72% compared to 52.28% renter-occupied units. By 2010, the homeownership rate decreased to 37.96% after the housing bubble bust and has remained relatively steady since then. According to the 2015 ACS the homeownership rate in Gainesville is 37.70%.

In terms of the location of owner-occupied and renter-occupied housing units, over the years, the areas with high homeownership rates and rental rates have remained fairly consistent. The percentage of renter-occupied units increased in 2010 but renters remained in the areas that were predominantly renter-occupied such as the UF area and along the U.S. 441 corridor.

Alachua County – Gainesville CBSA

Current location of owner-occupied and renter-occupied housing:

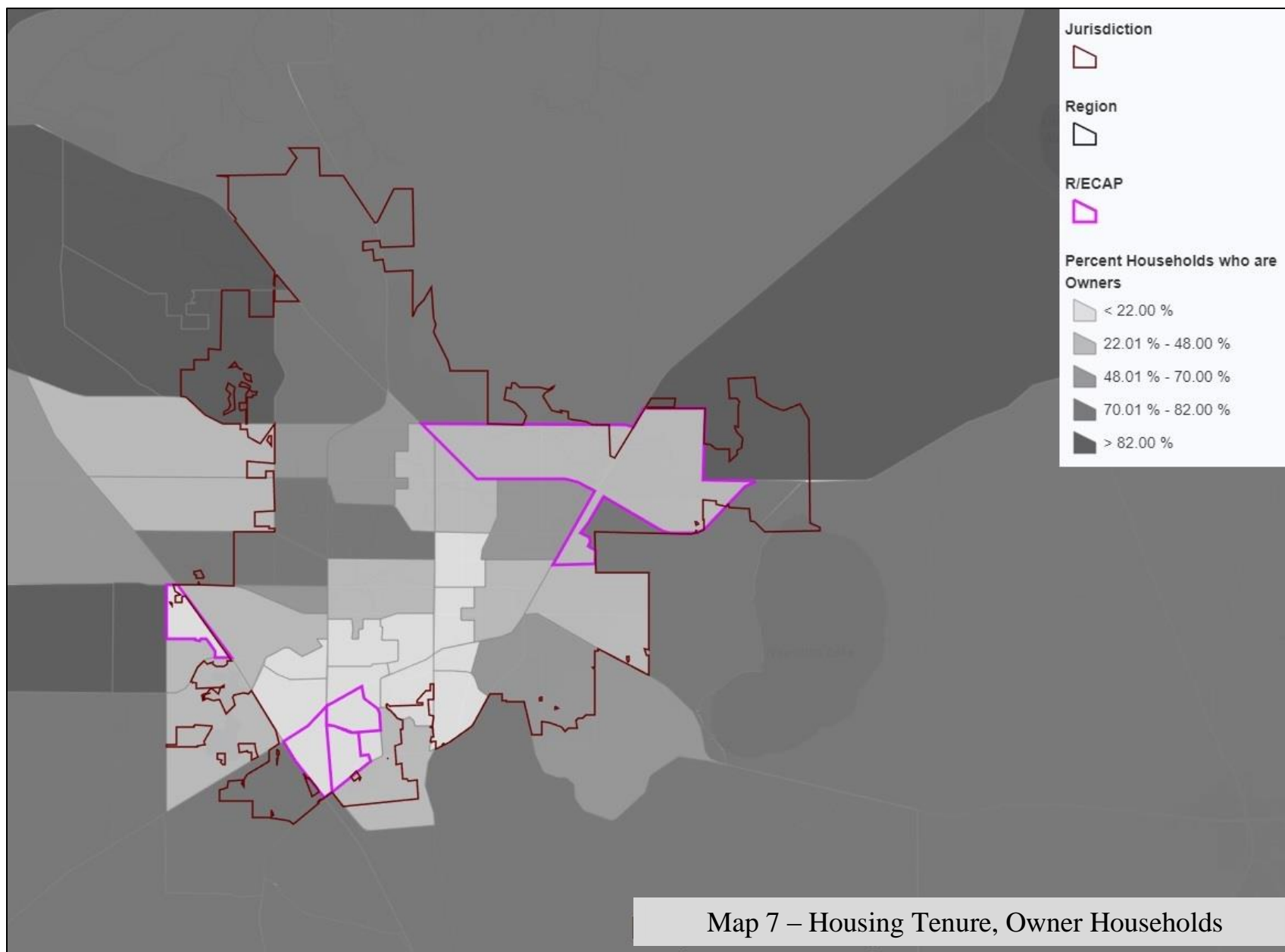
The homeownership rate in the region is higher than Gainesville. There are no areas where the percent of households who are renters is higher than 47% and the majority of the census tracts in the region have between 17.01% - 28.00% of renters.

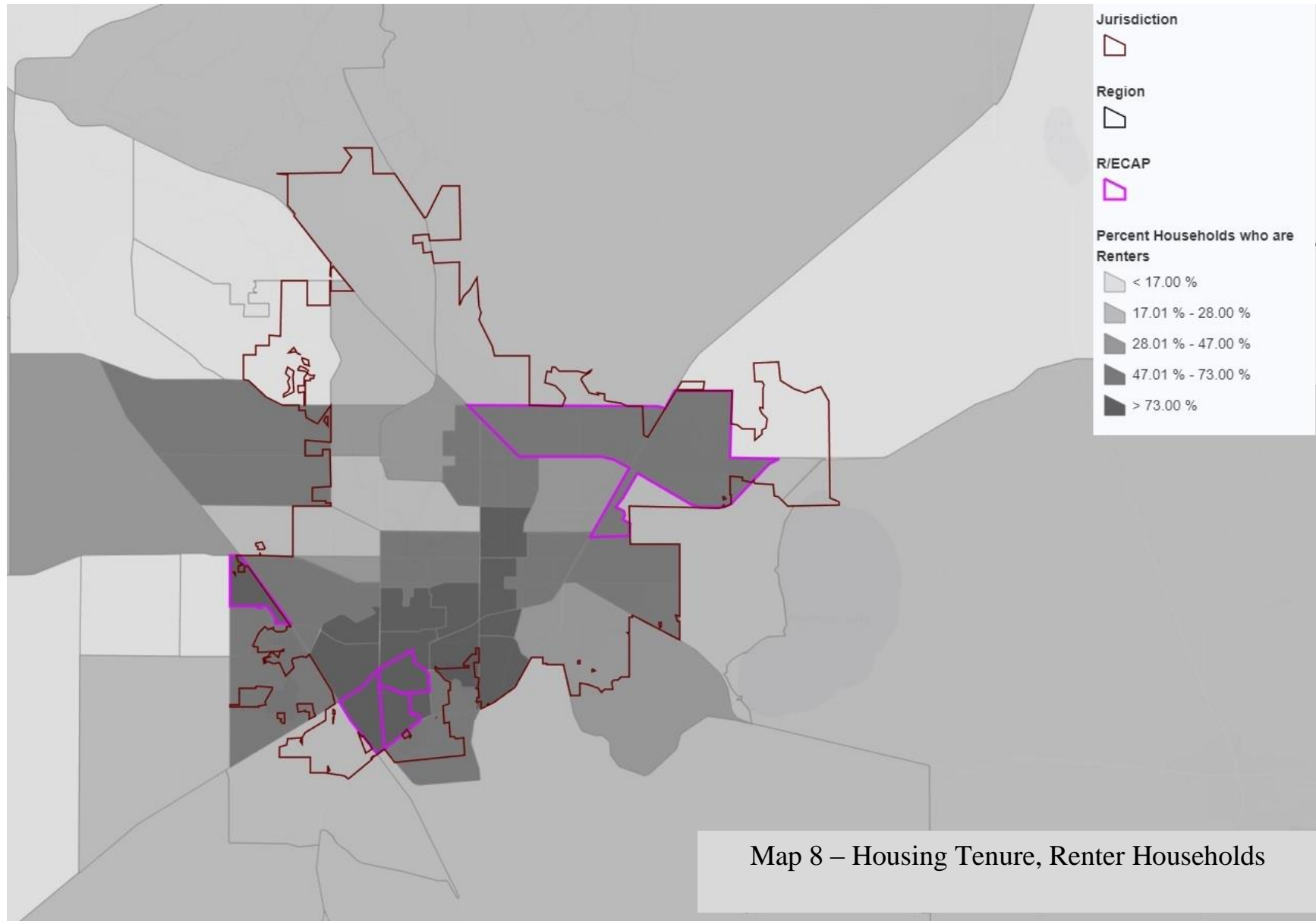
- ❖ Areas with the highest percentage of households who are owners (>82.00%) include:
 - High Springs, Santa Fe and La Crosse;
 - Alachua;
 - Newberry;

- Waldo and Orange Heights; and
- The NW quadrant of Gilchrist County.
- ❖ Area with highest percentage of households who are renters:
 - Trenton in Gilchrist County is 39.00% renter-occupied.

Geographic patterns in the location of owner-occupied and renter-occupied housing:

There has been no change in the location of owner-occupied and renter-occupied housing in the region between 2000 and 2010. Almost all the areas in the region have maintained a homeownership rate above 70% during this time period.





- e. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.*

As the population in Gainesville and the region continues to increase, trends suggest that the foreign-born, LEP, and minority population will continue to expand at a faster rate than the rest of the population. It is likely that these groups will cluster in certain communities. Immigrants tend to settle in ethnic communities where other foreign language speakers reside and where there are businesses that accommodate their cultural needs. Currently, there is a concentration of foreign-born and LEP persons in south Gainesville and as the immigrant population grows, this could lead to higher segregation.

2. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.*

HUD has provided data on segregation in Gainesville and the region by race/ethnicity and national origin. The federal Fair Housing Act also protects individuals on the basis of religion, sex, familial status, and disability. In Florida, pregnancy is also a protected characteristic. There is no local data or knowledge available relevant to segregation with respect to religion, sex, or pregnancy. The geographic location of persons with disabilities is discussed in the Disability and Access Analysis section of this document. In regards to familial status, Plan East Gainesville, a 2002 study funded by Alachua County, the City of Gainesville, the Florida Department of Transportation, Gainesville Regional Utilities and Gainesville Urbanized Area Metropolitan Transportation Planning Organization, stated that East Gainesville contained a higher proportion of single parent households than Alachua County. Most (55%) of the children in East Gainesville live in homes with single mothers, compared to Alachua County, where 65% of children live with a married household.

- b. *The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.*

To address the racial segregation in the jurisdiction, the City of Gainesville along with its public and private partners has engaged in both place-based and geographic mobility strategies. As an entitlement jurisdiction, Gainesville receives CDBG and HOME funds annually and administers and funds programs and projects that benefit low- and moderate income (LMI) individuals and households directly or benefits areas that are predominantly residential and where at least 51% of the population are LMI persons.

As part of the City's overall strategy to provide decent housing, create suitable living environments, and expand economic opportunities, during the development of its PY 2013-2017 Consolidated Plan, the City designated five areas where it intended to target funding to ensure that the investments had a transformative impact on the particular areas. The target areas are Porters Community, Duval, Southeast/Five-Points, 5th Avenue/Pleasant Street, and the University Area/Hawthorne Road

Corridor. The target areas also correspond with the eligible areas where CDBG funds can be expended to meet the low- and moderate-income area benefit national objective. The activities or programs that the City implements with its CDBG and HOME grant funds, as well as funds leveraged from state and local private or public sources, including the State Housing Initiatives Partnership Program (SHIP), include: rehabilitation of owner-occupied and renter-occupied housing, homebuyer assistance, development of affordable housing units, foreclosure prevention, public infrastructure activities, and public service activities that improve access to opportunities such as job training, homebuyer counseling, and access to childcare. The majority of beneficiaries to the City's CDBG and HOME programs are African Americans – a racial/ethnic group that is concentrated in areas of poverty and experiencing disproportionately greater housing problems.

Both the City and the County are committed to developing housing in older developed areas near employment centers and transit routes. In the past, this was attempted in the City, with mixed results, through the implementation of Special Area Plans (SAPs)/overlay districts. In 2017, the City implemented a new zoning code that replaced SAPs with other incentives. The County has designated a 300-acre area in unincorporated Alachua County located near the East Gainesville R/ECAP area as the Eastside Activity Center. This area will be developed as a mixed use activity center, including residential uses at a variety of densities, commercial, and employment-based land uses. The development of the Eastside Activity Center will include approximately 1,800 residential uses, 200,000 square feet of retail uses, and 600,000 square feet of office uses. There will also be multimodal transportation connection between the Eastside Activity Center and other areas within Gainesville.

The County is also coordinating with the City of Gainesville to convert the Alachua County Fairgrounds, located near the East Gainesville and Waldo Road Corridor R/ECAP areas, into a mixed use employment center. To date, the property has been acquired and plans developed for the relocation of the Fairgrounds and for the annexation of the property into the City of Gainesville.

In the Tower Rd./I-75 Corridor R/ECAP, the County has adopted a Neighborhood and Enhancement Program and is in the process of ramping up the task force for the areas involving various County departments including Growth Management/Code, Community Support Services/Housing Program, Sheriff, Fire, Public Works, Animal Services, and Solid Waste. Place-based investments in the areas include, the SWAG Family Resource Center which is a partnership between Alachua County, Partnership for Strong Families, and SWAG volunteers. The SWAG Family Resource Center offers after-school tutoring programs, summer programs for children, food pantry, health and exercise programs, counseling services, parenting support, and other social services.

The Gainesville Community Redevelopment Agency (CRA) also works to attract private investment to leverage public tax increment financing in order to improve economic development and public infrastructure in four CRA districts – Downtown, Eastside, Fifth Avenue/Pleasant Street, and College Park/University Heights. The majority of the CRA districts are within the East Gainesville area and are also included the City's target areas.

The CRA implements neighborhood improvement, commercial improvement, and economic development incentive programs including:

- Residential and Commercial Paint Programs – provides homeowners and business owners with vouchers to pressure wash and paint the exterior of their homes or commercial properties.
- Commercial Façade Improvement Incentive Program – a matching grant program that reimburses business owners for eligible improvements to the façade, of existing commercial properties including signage, awning or canopies, windows, fencing, and landscaping.
- Job Creation Incentive Program – encourages the creation and maintenance of full time jobs by offering a grant to companies to create or relocate jobs within the CRA districts.
- Company Relocation Incentive Program – relocation of companies and their employees into the CRA areas to lower vacancy rates, increase employment levels, raise the tax base, diversity economic opportunities, and promote redevelopment goals.

Some of the CRA's recent accomplishments include the completion and opening of Depot Park – a 32-acre park built on a remediated brownfield site and the renovation of the Bo Diddley Plaza. The CRA is also in the process of developing 34 single-family homes in the Heartwood community in East Gainesville on the site of the former Kennedy Homes Apartments – a public housing complex built in 1968 that became known for violent crimes, drugs, and poor living conditions and that was eventually demolished in 2008. Heartwood is within walking distance of another large-scale redevelopment project known as Cornerstone which is a mixed-use development which will include commercial/office uses and is expected to bring jobs to the area. Other projects that are planned or underway in the CRA districts include several streetscape projects, and the redevelopment of the Power District which will include a mix of amenities as well as commercial and residential uses.

In regards to mobility strategies, one of the goals of the Gainesville Housing Authority (GHA) and the Alachua County Housing Authority (ACHA) is to promote integration. GHA works towards this goal by utilizing payment standards that will enable Section 8 Housing Choice Voucher (HCV) program recipients to rent throughout the jurisdiction. Specifically, GHA has created a blended payment standard depending on the number of bedrooms in a unit. The standard for zero to three bedroom units is 110% of Fair Market Rents (FMR) and for units with four or more bedrooms, the standard is 100% of FMR. The GHA also markets the HCV program to property owners outside the areas of minority and poverty concentration and assists HCV holders to locate housing units in areas of opportunity.

The GHA also offers the Job Training and Entrepreneurial Program (JTEP). This program provides residents an opportunity to receive on the job training skills and helps them to secure employment throughout the City. Both GHA and ACHA plan on becoming a Move to Work (MTW) agencies to help residents find employment, become self-sufficient, and increase housing choices for low-income families.

The City of Gainesville also supports the dispersal of affordable housing units throughout the City by removing regulatory barriers to the development of affordable housing. The City provides developer incentives that will increase the supply of affordable housing constructed by the private sector. Some of the developer incentives offered by the City include expedited permitting, increased housing densities, reduction in parking and setback requirements, flexible lot configurations, modification of

street requirements, and the provision of an inventory of publicly owned land suitable for affordable housing.

The County has a number of place-based strategies for improving segregation patterns and other opportunity-related challenges. In particular, for the Tower Rd./I-75 Corridor R/ECAP, the County has in its Code of Ordinances a Neighborhood and Enhancement Program, including a Sugarfoot Oaks/Cedar Ridge Preservation and Enhancement District, which covers most of the R/ECAP. Place-based investments in this area include the SWAG Family Resource Center, which offers computers and internet access, printing & copying, faxing, books, games, toys for children, and referrals for services.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Lack of private investments in specific neighborhoods
- Location and type of affordable housing
- Private discrimination
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of public investments in specific neighborhoods
- Loss of affordable housing
- Source of income discrimination.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

The AFFH rule defines a racially or ethnically concentrated area of poverty as “a geographic area with significant concentrations of poverty and minority concentrations”. The HUD-provided maps, include outlined census tracts that meet the criteria for R/ECAPs. R/ECAPs must have a non-White population of 50% or more and have an individual poverty rate (percentage of individuals living below the poverty line) of 40% or more or a poverty rate that is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

City of Gainesville

According to the HUD maps, there are two R/ECAP areas within the Gainesville city limits as follows:

- Waldo Road Corridor – located in the NE section of the City and is comprised of census tract 19.02. This R/ECAP is bounded on the north by NE 53rd Ave., on the south primarily by NE 39th Ave. with a portion extending to NE 16th Ave., on the west by NW 13th St. and the railroad tracks, and on the east by NE 39th Blvd. This R/ECAP includes two small unincorporated areas: an area east of the Ironwood Golf Course, south of NE 53rd Ave. and an area southeast of the Gainesville Regional Airport, north of NE 39th Ave.
- SW Student Housing Corridor - a grouping of three census tracts (15.15, 15.17, and 15.19). This R/ECAP is bounded on the north by Archer Rd., on the south by Williston Rd., on the west by I-75, and on the east by SW 23rd Terrace.

In addition to these two HUD-identified R/ECAPs, local knowledge – including input from residents and stakeholders in the community participation process, identified East Gainesville as an area of concentrated poverty. The East Gainesville R/ECAP is nearby the Waldo Road Corridor R/ECAP and the boundaries are as follows:

- East Gainesville – includes portions of three census tracts (5, 6, and 7) and is bounded on the north by NE 15th Ave., on the south by SE 41st Ave., on the west by Main Street, and on the east by SE 43rd St.

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The HUD maps identified one R/ECAP in the region that is adjacent to the western border of the City of Gainesville and is comprised of census tract 22.17. The boundaries for this R/ECAP are as follows:

- Tower Rd./I-75 Corridor – bounded on the north by Newberry Rd., on the south by SW 8th Ave. and at the furthest point south by SW 20th Ave., on the west by 75th Street (also known as Tower Rd.) and on the east by I-75.

b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

Table 7 R/ECAP Demographics						
	City of Gainesville			Alachua County – Gainesville CBSA		
R/ECAP Race/Ethnicity		#	%		#	%
Total Population in R/ECAPs		16,665	-		22,505	-
White, Non-Hispanic		7,546	45.28%		9,734	43.25%
Black, Non-Hispanic		4,451	26.71%		7,058	31.36%
Hispanic		2,131	12.79%		2,791	12.40%

Asian or Pacific Islander, Non-Hispanic		2,030	12.18%		2,162	9.61%
Native American, Non-Hispanic		34	0.20%		57	0.25%
Other, Non-Hispanic		62	0.37%		83	0.37%
R/ECAP Family Type						
Total Families in R/ECAPs		1,793	-		3,093	-
Families with children		772	43.06%		1,595	51.57%
R/ECAP National Origin						
Total Population in R/ECAPs		16,952	-		22,505	-
#1 country of origin	India	417	2.46%	India	417	1.85%
#2 country of origin	China excl. Hong Kong & Taiwan	336	1.98%	China excl. Hong Kong & Taiwan	363	1.61%
#3 country of origin	Cuba	240	1.42%	Venezuela	272	1.21%
#4 country of origin	Philippines	199	1.17%	Cuba	240	1.07%
#5 country of origin	Jamaica	154	0.91%	Jamaica	232	1.03%
#6 country of origin	Saudi Arabia	151	0.89%	Philippines	209	0.93%
#7 country of origin	Russia	141	0.83%	Korea	169	0.75%
#8 country of origin	Other Western Africa	118	0.70%	Saudi Arabia	151	0.67%
#9 country of origin	Venezuela	92	0.54%	Russia	141	0.63%
#10 country of origin	Peru	85	0.50%	Other Western Africa	118	0.52%
<p><i>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.</i></p> <p><i>Note 2: Data Sources: Decennial Census; ACS</i></p> <p><i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i></p>						

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Table 7 shows the percentage of persons living in R/ECAPs by race/ethnicity. There are 16,665 persons living in the Waldo Road and SW Student Housing Corridor R/ECAPs. Over 45% of the population in the R/ECAPs are White individuals however, in terms of minority composition, African Americans have the highest percentage of residents in the R/ECAP areas at 26.71%. The SW Student Housing Corridor R/ECAP has a much more diverse racial/ethnic composition than the other R/ECAP areas. In the Waldo Road Corridor, African Americans make up 57.15% of the R/ECAP population while in the SW Student Housing Corridor, African Americans represent 19.95% of the population and Hispanic persons and Asian or Pacific Islanders also make up a significant portion of the population at 14.54% and 14.37%, respectively. For the East Gainesville R/ECAP, the total population is 12,404 persons comprised of 3,890 (31.36%) White individuals, 7,637 (61.57%)

African Americans, 454 (3.66%) Hispanics, 104 (0.84%) Asian or Pacific Islanders, 37 (0.25%) Native Americans, and 282 (2.27%) Multi-racial or Other individuals.

When comparing the protected class groups that live in the jurisdiction as a whole to the proportion of each protected class group living in the R/ECAPs, the largest difference is in the White and African American populations. In the jurisdiction, 58.09% of the residents are White compared to 39.61% of the residents in the R/ECAPs (including East Gainesville R/ECAP). Additionally, 41.58% of Gainesville's residents in R/ECAPs are African American, compared to 22.39% of residents in the City as a whole.

Table 7 also provides data on the percentage of persons living in R/ECAPs that are families with children and persons that are foreign-born. When compared to the total population in the jurisdiction from Table 1, a slightly greater percentage of families with children reside in R/ECAPs – 43.06% in the R/ECAPs compared to 40.21% citywide. For the foreign-born population, the top three most populous countries in the R/ECAPs are the same as for the City – China, India, and Cuba, however, Indians having the greatest share of the population in R/ECAPs at 2.46% but represent 1.18% of the City's overall population. Map 3 provides details on the most populous country of origin represented in each R/ECAP. In the Waldo Road Corridor R/ECAP, the most populous country of origin is the Philippines while in the SW Student Housing Corridor R/ECAP, the most populous country of origin is India.

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Like Gainesville, the data in Table 7 shows that the predominant race/ethnic group in the R/ECAPs in the region are White individuals at 43.25% followed by African Americans residents at 31.36%. White individuals make up 65.22% of the population regionwide while only 19.03% of residents in the region are African American. In the Tower Road/I-75 corridor R/ECAP, about 71.00% of the residents are African American. A larger proportion of families with children reside in the R/ECAPs than in the region as a whole, 51.57% versus 41.01%.

In regards to national origin, the top five most populous countries of origin are India, China, Venezuela, Cuba, and Jamaica. Indians are overrepresented in the R/ECAPs making up 1.85% of the population in R/ECAPs compared to 0.73% in the region as a whole. The most populous country of origin represented in the Tower Rd./I-75 Corridor R/ECAP is Jamaica.

c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Maps 4, 5, and 6 show past R/ECAP boundaries with demographic changes for 1990, 2000, and 2010. Based on the 1990 and 2000 decennial census, no R/ECAPS existed in Gainesville or the region. However, in 2010, three new R/ECAP areas emerged. Two of the areas, Waldo Road Corridor and SW Student Housing Corridor are the same as the current R/ECAPs identified above but a third R/ECAP, census tract 8.08, was also present. Census tract 8.08 is bounded by SW 16th Ave., to the north, SW 13th Street to the west, and Williston Road to the south and includes the Kirkwood neighborhood. The two main minority groups in this R/ECAP as of 2010 were African Americans (21.24%) and Asian or Pacific Islanders (20.77%). The current R/ECAP boundaries shown on Maps 1, 2, and 3, indicate that census tract 8.08 is no longer a R/ECAP however, it may be close to

becoming a R/ECAP again based on data available through the HUD CPD mapping tool. The area has a non-White population of 51.20% and a poverty rate of 41.61% according to the 2013 ACS. The Tower Rd./I-75 Corridor R/ECAP emerged in the region after 2010.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.*

HUD has provided data on R/ECAPs in Gainesville and the region by race/ethnicity and national origin. The federal Fair Housing Act also protects individuals on the basis of religion, sex, familial status, and disability. In Florida, pregnancy is also a protected characteristic. There is no local data or knowledge available relevant to R/ECAPs with respect to religion, sex, familial status or pregnancy. The analysis of persons with disabilities residing in R/ECAPs is discussed in the Disability and Access Analysis section of this document.

- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.*

The place-based investment strategies that have been employed in the R/ECAP areas and the geographic mobility strategies of the GHA, AHCA, and the City of Gainesville are described under the Segregation/Integration section of this document.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Location and type of affordable housing
- Private discrimination
- Displacement of residents due to economic pressures
- Loss of affordable housing
- Source of income discrimination

iii. Disparities in Access to Opportunity

1. Analysis

a. Education

- i. *For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.*

Schools are an essential component in the long-term health of a community and it is not just the strength of a community that depends on the quality of schooling. Income mobility is also deeply tied to the quality of schooling a child receives. When there is deep inequality in schools, there is likely to be deep inequality in future incomes for households living in those areas.

The School Proficiency Index shows the relative quality of schools available for 4th graders by race/ethnicity. The school proficiency index captures academic achievement by 4th graders based on state reading and math exam scores. HUD states it uses 4th grade achievement because elementary schools collect students from a far more limited geography than do middle and high schools. Thus, elementary school proficiency is a better proxy for neighborhood opportunity than are middle and high schools. The School Proficiency Index also relies on data from 2013/2014 provided by GreatSchools. Specifically, the GreatSchools data reports attendance and proficiency data for 4th grade students in neighborhood schools and compares that data to a national average. A higher value indicates higher levels of school proficiency.

Table 8 School Proficiency Index			
Race/Ethnicity	City of Gainesville	Alachua County – Gainesville CBSA	Regional Difference
White, Non-Hispanic	41.19	41.56	0.37
Black, Non-Hispanic	29.47	29.93	0.46
Hispanic	39.88	40.07	0.19
Asian or Pacific Islander, Non-Hispanic	41.68	41.58	-0.10
Native American, Non-Hispanic	36.76	36.99	0.23
Population Below the Federal Poverty Line			
White, Non-Hispanic	39.79	43.86	4.07
Black, Non-Hispanic	25.34	31.74	6.40
Hispanic	38.02	43.08	5.06
Asian or Pacific Islander, Non-Hispanic	39.86	41.03	1.17
Native American, Non-Hispanic	39.92	39.90	-0.02
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>			
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>			

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Asians or Pacific Islanders have the greatest access to quality schools, with an index score of 41.68. Second in terms of access to quality schooling is Whites, with a score of 41.19. Turning to the lowest school proficiency index scores, African Americans (29.47) and Native Americans (36.76) have notably lower access to proficient schools. It is important to note that the 12.21-point difference in score between African Americans and Asians/Pacific Islanders represents a fair housing concern in the City.

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When reviewing the School Proficiency Index scores regionally, the same trends noted for the City remain true. Whites (41.56) and Asians or Pacific Islanders (41.58) enjoy the greatest access to proficient schools in the County, while African Americans (29.93) and Native Americans (36.99) score the lowest on the school proficiency index. There is a 11.63 score difference between African Americans and Whites, indicating a continued trend of disparities in access to proficient schools in the region.

Regionally, there is slightly greater access to proficient schools across all racial/ethnic groups, with a 1.15 difference in aggregate scores between Gainesville and the region. Although the differences are largely negligible, the largest positive score difference between the City and region is for the African Americans population (.46 difference), indicating a marginal improvement in access to proficient schools in the region relative to the City. This trend remains the same for Whites (.37 difference).

Differences in school quality are often attributed to the degree of wealth in neighboring communities, a high quality school with excellent test results, graduation rates, and programs, is able to achieve those results through increased spending and the relative wealth of its student families. On the other hand, underfunded schools are often captured in a self-reinforcing and debilitating cycle: significant disinvestment, lower student performance, increased rates of truancy and abandonment of neighborhoods by wealthy and stable families. Thus, when examining school performance, it is reasonable to expect a connection between high poverty neighborhoods and poor school performance and it is difficult to identify broad patterns of discrimination against the protected classes.

To address these challenges, it is valuable to examine aggregate school proficiency by race/ethnicity, and compare those aggregates to a divided distinction between populations above poverty and below the poverty line. The School Proficiency Index Table also includes aggregate scores by Race/Ethnicity for populations below the poverty line. The difference between the two populations, the score for those above the poverty line and for those below the poverty line, lends evidence to concerns around broader discrimination based on Race/Ethnicity because the broad trend of school quality and income is eliminated.

The table below represents the difference in school proficiency index scores between poverty and non-poverty populations. A negative score indicates the population above the federal poverty level has greater access to proficient schools than does the population below the poverty level.

Table 9 Difference in School Proficiency Index Scores Between Poverty and Non-Poverty Race/Ethnic Populations		
	City of Gainesville	Alachua County – Gainesville CBSA
White, Non-Hispanic	-1.40	2.30
Black, Non-Hispanic	-4.13	1.81
Hispanic	-1.86	3.01
Asian or Pacific Islander, Non-Hispanic	-1.82	-0.55
Native American, Non-Hispanic	3.16	2.91
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

The table “Difference in School Proficiency Index scores between poverty and non-poverty Race/Ethnic populations” shows an interesting distinction between the City and the surrounding region. For the City, there is a consistent trend of higher school proficiency scores for the population above the poverty line, with the exception of the Native American population (3.16, indicating the population below the federal poverty level has greater access to proficient schools compared to the population above). In the County/CBSA region, on the other hand, there is improved access to proficient schools for the population below the federal poverty level, with the exception of Asians/Pacific Islanders (-.55). It is important to note that African American families living in the County/CBSA region have the lowest positive difference (1.81) of all racial/ethnic categories, and Hispanics have the largest difference (3.01).

These figures present an uncomfortable reality: the County/CBSA region has more success offering access to proficient schools to its lower income populations, regardless of racial/ethnic composition compared to the access provided by schools in the City of Gainesville. This trend will be examined in more detail in the following section, where disparities in access to proficient schools are examined through the lens of residential living patterns.

- ii. *For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*

Maps showing the school proficiency index with various protected class layers further illuminate fair housing concerns in the region. While School Proficiency Index scores show aggregate results across the City and in the County, examining maps facilitates a more nuanced examination of school quality trends in the region.

Using HUD’s Map 9 for demographics and school proficiency, with Race/Ethnicity dot density, provides further evidence for disparities in access to quality schools in the region. In general, there are concentrations of African Americans and Hispanics in low-quality school neighborhoods compared to the quality of schools accessible to Whites and Asians/Pacific Islanders.

HUD also provides residential living data on populations by national origin. In this case, conclusions concerning access to proficient schools are less discernable. Generally, the national origin categories

most prevalent in the region include Chinese, Indians, Cubans, Filipinos and Mexicans, listed in order from most prevalent to least prevalent.

City of Gainesville

Gainesville school proficiency scores are typically lower to the East, an area characterized by high concentrations of African Americans. In the urban core near the University of Florida, there is greater racial diversity, with concentrations of African Americans, Hispanics, and Whites. This area enjoys moderate values on the school proficiency index (ranging from 41 – 51). In general, the school proficiency index scores in the City are lower than the scores in the County.

Foreign born populations in the City are geographically dispersed, with the notable exception of concentrations of Chinese in the City's Southeast, to the East of Bivens Lake. This community has access to schools scoring moderate on the proficiency index (41 – 45). It is difficult to make solid conclusions related to fair housing concerns for the City's national origin population.

Alachua County – Gainesville CBSA

In general, certain neighborhoods in the County enjoy the highest quality schools. In particular, suburban areas just outside the City's Western border, to the West of Interstate I-75, enjoy high performing schools. In some areas, the scores reach as high as 91 out of 100.

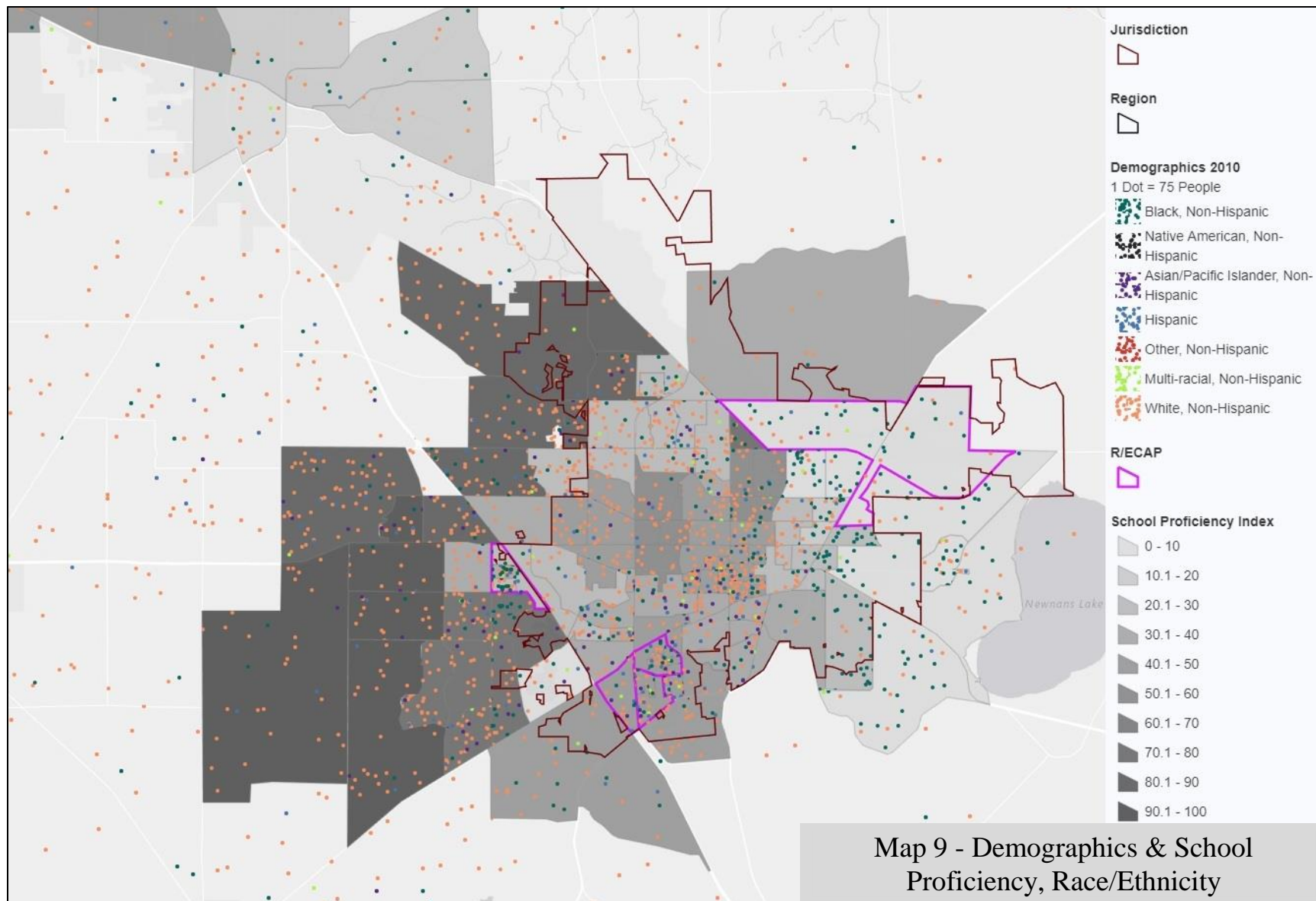
There are concentrations of national origin populations in the suburban communities stretching to the County's North and West, running along Interstate I-75. While many of these communities do not have a score from the HUD school proficiency index, the areas that are scored have high marks, some in the 90s. These communities are represented by a diverse mix of national origins, including Jamaica, Mexico, Canada, Philippines, and China. Given the geographic dispersion of the national origin population, and the general lack of data related to school proficiency across the County, it is difficult to make conclusions related to fair housing concerns for the County's national origin population.

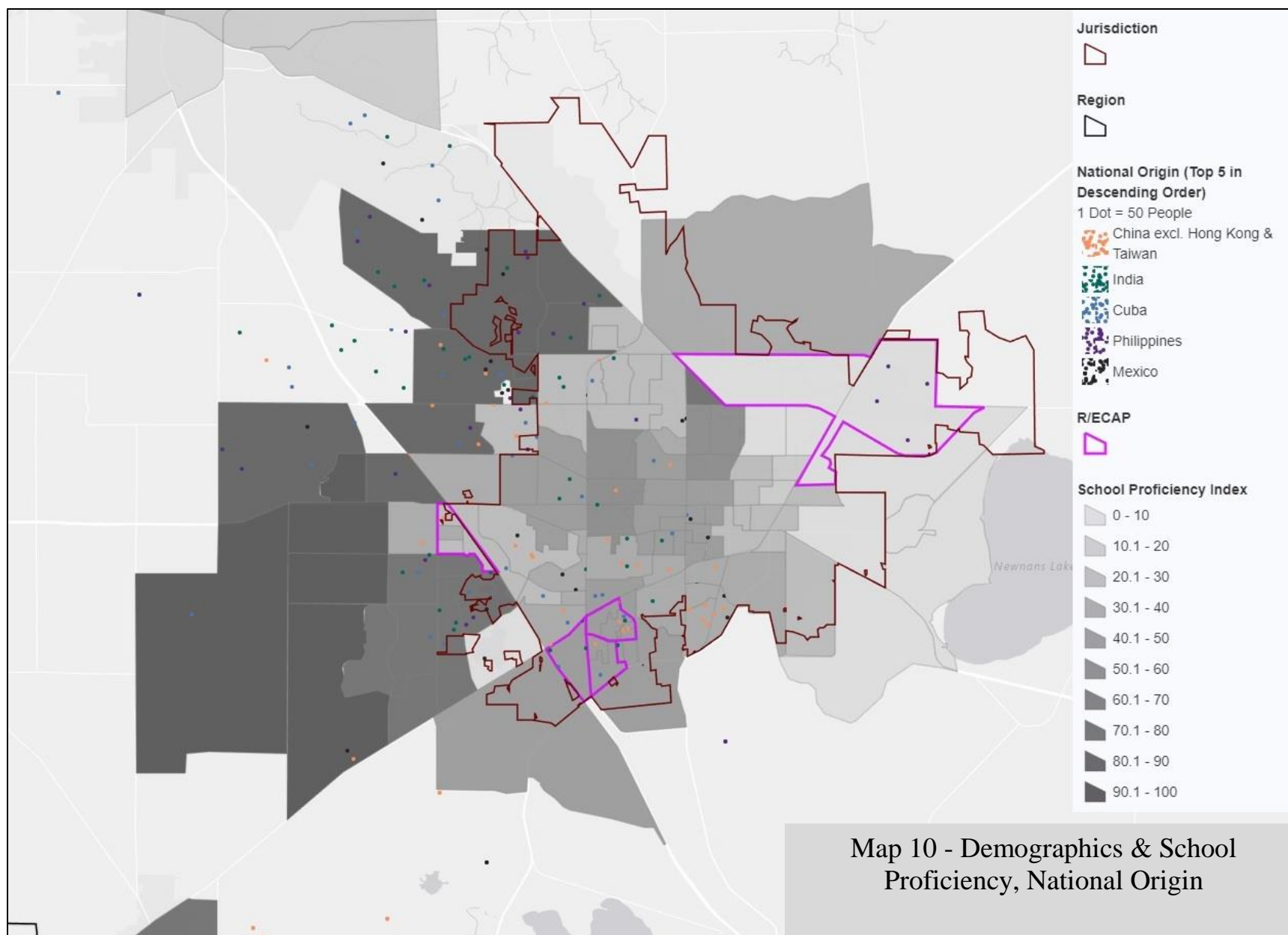
R/ECAPs

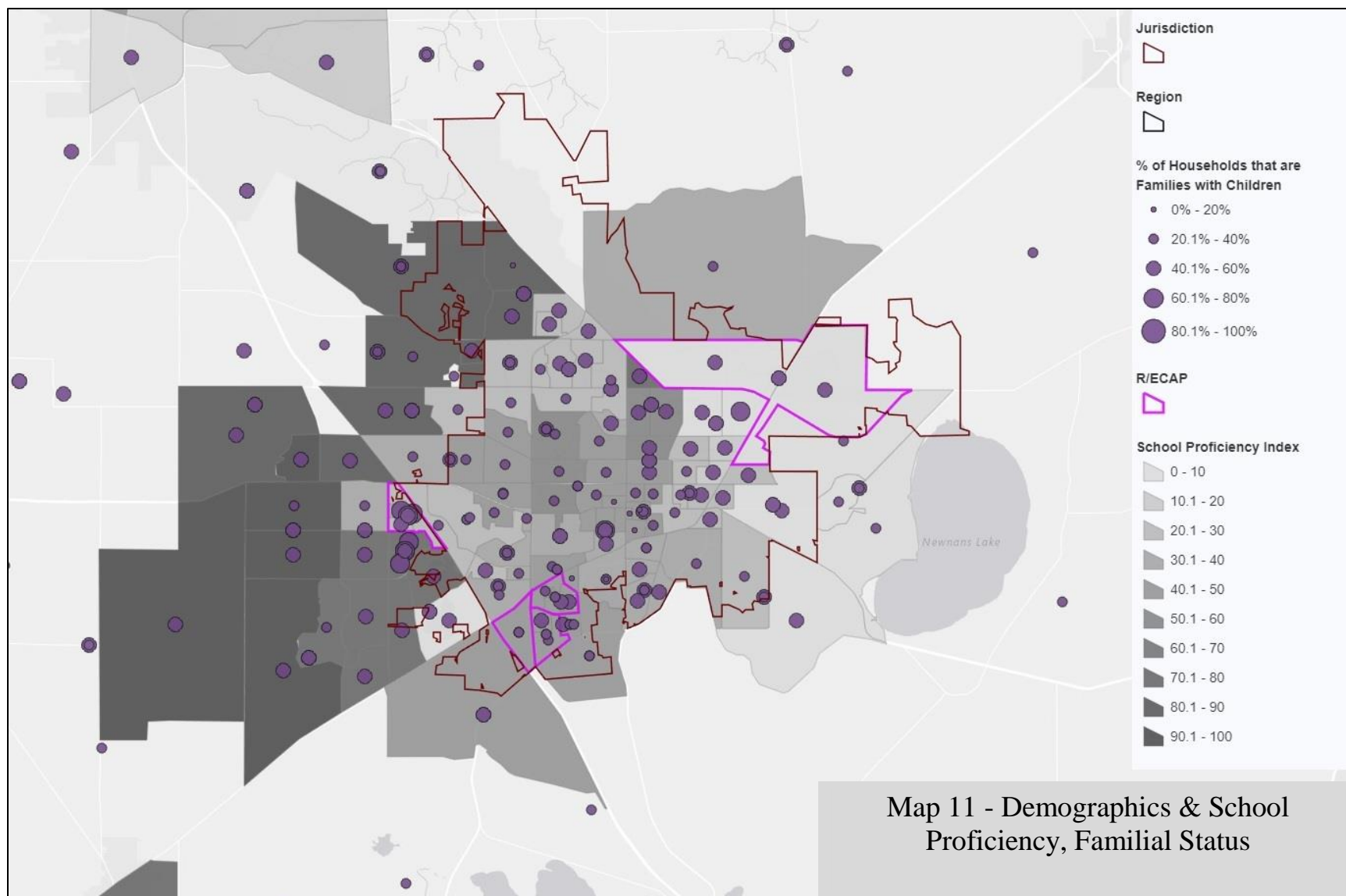
The census tracts classified as R/ECAPs also face significant challenges in school proficiency, particularly the Waldo Rd Corridor. For the two block groups within the Waldo Rd Corridor, the index scores are 6 and 4 – comparatively low scores, considering some areas in the City reach values of 84 in the Northwest. The SW Student Housing Corridor has access to moderate values on the school proficiency index. The Tower Rd R/ECAP also has high concentrations of racial/ethnic minorities, and suffers from a low school proficiency index score (28).

Relative to the region overall, there appears to be concentrations of national origin population within the region's R/ECAPs, particularly for the SW Student Housing Corridor R/ECAP cluster within the City, and in the Tower Rd / I75 Corridor R/ECAP.

The communities with the highest value schools are more likely to have a high concentration of Whites and Asians/Pacific Islanders. The census tracts noted above, those with school proficiency index scores in the 90s, have small percentages of minorities, in particular African Americans (ranging from 2.68% - 4.85%).







- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.*

Community participation and stakeholder consultation revealed there are concerns related to Alachua County Public School approach to facility repairs, upgrades, and long-term planning. It was identified that there may be a perception that Alachua County Public Schools employs a reactive strategy for facility upgrades, with schools enjoying upgrades and facility investment are those where student population growth is the highest. This creates a self-reinforcing cycle where the quality school facilities attract new students, and the new students invite further facility investments.

In contrast, consultation with Alachua County Public Schools revealed challenges related to funding from the State. Counties in Florida receive a majority of public school revenues through State allocation. In Alachua County, local property taxes represent a small share of the school Board's total annual budget. This reality eliminates a significant share of local control of funding decisions.

Further, consultation with Alachua County Public Schools revealed challenges imposed by state policies to encourage school choice, particularly the Opportunity Scholarship Program. This program offers students who attended, or who were assigned to attend a failing public school, the option to choose a higher performing public school. The goal is admirable: to ensure students have access to schools of high quality, no matter where they live. Consultation reveals significant drawbacks to the program, primarily focused on a "shuttling" effect for students. As students move from one school to the next, the dislocation can result in lower individual student performance, and aggregate negative impacts on school performance for state testing regimes. Anecdotally, those same families then elect to transfer their student to yet another school the following year. This churn of students chasing after quality schools poses a real challenge for the Alachua County school board, school principals, families, and students.

In terms of mobility, Alachua County Schools has policies for ensuring students with special needs (including persons with a mental or physical disability) are provided transportation to an appropriate school. Further, students living over 2 miles from their assigned school are offered bus transportation to and from the home. In some limited circumstances, Alachua County Schools will offer a stipend for personal transportation in cases where a student's principal residence is inaccessible by County buses.

Interviews with Alachua County Schools revealed concerns related to sufficient funding for physical repairs and technology upgrades across the region. It should be noted that a majority of funding for Alachua County is sourced from the state, with a smaller percentage of funding coming from local property taxes. In some cases, the County has identified the need for a new school to increase capacity in high growth communities, but the state denies these applications. In this sense, Alachua County is not fully in control of its ability to meet increasing numbers of students at all age ranges.

b. Employment

- i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.*

Access to employment and the labor market is directly related to an individual's ability to obtain affordable housing and also has a significant impact on a jurisdiction's economic sustainability.

Employment is a significant factor for self-sufficiency and economic growth as the employed are able to contribute to local businesses which assists in stabilizing the community. Without access to suitable employment, many low-income persons would not have access to decent, safe, and affordable housing or even a suitable living environment for themselves or their families.

An analysis of the jobs proximity index and the labor market index facilitate identification of disparities in access to jobs and labor markets. For the purpose of this analysis, and as defined by HUD, the jobs proximity index measures the physical distance between places of residence and jobs by race/ethnicity. The labor market index measures unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree. Higher job proximity values represent better access to job proximity and greater engagement in the labor market.

Table 10				
Labor Market and Jobs Proximity Index				
Race/Ethnicity	City of Gainesville		Alachua County – Gainesville CBSA	
	Labor Market Index	Jobs Proximity Index	Labor Market Index	Jobs Proximity Index
White, Non-Hispanic	59.37	55.36	57.89	55.84
Black, Non-Hispanic	35.67	53.44	40.05	54.49
Hispanic	53.22	54.12	56.93	54.48
Asian or Pacific Islander, Non-Hispanic	57.63	53.81	65.41	54.14
Native American, Non-Hispanic	53.45	55.36	51.46	55.43
Population below federal poverty line				
White, Non-Hispanic	52.53	59.83	50.56	53.22
Black, Non-Hispanic	31.22	54.49	36.60	50.39
Hispanic	50.94	56.02	51.98	52.96
Asian or Pacific Islander, Non-Hispanic	61.51	51.46	62.52	50.68
Native American, Non-Hispanic	56.12	52.48	50.64	38.12
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>				
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

HUD also provides data on labor market and jobs proximity index values for both the population above the federal poverty level and below the poverty level. Value differences are summarized in the table below. A negative value indicates the population above the federal poverty level enjoys greater access to labor market and jobs proximity than does the population below the poverty level. A positive value indicates the population above the federal poverty level has worse access to labor market and jobs proximity than does the population below the poverty level.

Table 11 Difference in Labor Market and Jobs Proximity Values Between Poverty and Non-Poverty Race/Ethnic Populations				
Racial/Ethnic Category	City of Gainesville		Alachua County-Gainesville CBSA	
	Labor Market Index	Jobs Proximity Index	Labor Market Index	Jobs Proximity Index
White, Non-Hispanic	-6.84	4.47	-7.33	-2.62
Black, Non-Hispanic	-4.45	1.05	-3.45	-4.10
Hispanic	-2.28	1.90	-4.95	-1.52
Asian or Pacific Islander, Non-Hispanic	3.88	-2.35	-2.89	-3.46
Native American, Non-Hispanic	2.67	-2.88	-0.82	-17.31
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

City of Gainesville

When examining labor market index values for Gainesville, there is relative equality between the different racial/ethnic categories, with the notable exception of African Americans. While there is a 6.15 value differential between the highest racial/ethnic category (Whites with 59.37) and the second lowest-value category (Hispanics with 53.22), African Americans lag far behind Whites with a score differential of 23.7 (African Americans with 35.67 index value). This indicates African Americans in particular are struggling to access the labor market, and is certainly a function of lack of education in the African Americans population, a lower labor force participation rate, and high unemployment.

The labor market index also shows that for Asians/Pacific Islanders and Native Americans, the population below the FPL enjoy greater access to their respective labor markets compared to the populations above the FPL. Alternatively, the White, African Americans, and Hispanic populations below the FPL suffer from lower rates of labor market participation. It is difficult to assess the causes for this distinction, but it does indicate conditions in the City facilitate labor market access for low-income families.

When examining job proximity index values for Gainesville, there is relative equality between the different racial/ethnic categories, even for the African Americans population. There is a 1.92 value difference between the highest value racial/ethnic category (Whites and Native Americans with 55.36) and the lowest value category (African Americans with 53.44). This indicates that while African Americans are to some degree spatially excluded from proximate jobs, the difference is marginal.

The jobs proximity index also shows that for Whites, African Americans, and Hispanics, the population below the FPL enjoy greater proximate access to jobs compared to their wealthier cohorts. Alternatively, the Asian/Pacific Islander and Native American populations below the federal poverty level have worse proximate job access.

Alachua County – Gainesville CBSA

When examining labor market index values for Alachua County, the same disparities identified in Gainesville extend to the County. African Americans in particular face challenges in labor market access (40.05), and the differential between the highest scoring category (Asians/Pacific Islanders with 65.41) is 25.36. It is worth noting that the highest value category in the County is Asians/Pacific Islanders followed by Whites.

When examining the difference in labor market index values for Alachua County, one can see that the population below the FPL, regardless of racial/ethnic category, suffers from worse labor market access than does the population above the FPL. There is a wide range in values between the populations, however. For Native Americans, there is only a -.82-value difference between the population below the FPL, which indicates that for Native Americans, income does not necessarily facilitate greater labor market access. Alternatively, there is a -7.33-value difference between Whites, indicating income enables White families to engage in the labor market to a greater degree than other racial/ethnic categories.

When examining job proximity index values for Alachua County, compared to the City there is greater equality between the highest and lowest value racial/ethnic categories (a difference of 1.7). This indicates that there is relatively little residential spatial exclusion from jobs in the County.

When examining the difference in jobs proximity index values for Alachua County one can see that for the population below the FPL, regardless of racial/ethnic category, there is worse proximate jobs access compared to their wealthier cohorts. Of particular note is the vast disparity in jobs proximity for low-income families in the Native American population (-17.31). This indicates that low-income Native Americans are forced to live in communities spatially separated from available job markets.

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

There are many factors that can affect a person's ability to obtain employment. Housing location is one contributing factor and many times can be directly linked to poverty. Access to affordable housing and access to employment must go hand-in hand when trying to alleviate poverty. Often the relationship between the two is not conducive to the needs of residents, specifically low and very-low income populations. Location of affordable housing could be seen as the primary component to alleviating poverty with other factors such as employment, schools, transportation etc. falling under its umbrella.

HUD provides data and mapping related to the residential living patterns for three protected classes: race/ethnicity, familial status and national origin. Residential living patterns matter, in this context, because certain areas of the region have stronger local job markets and proximity to jobs, than other areas. While there are a range of reasons why certain protected classes may be excluded from neighborhoods, the costs remain the same regardless: reduced access to job opportunities, increased commuting times, and reduced labor force participation rates.

Job Proximity

When assessing the HUD map for job proximity, darker shades represent higher values on the Job Proximity Index. Specifically, the Job Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. After reviewing the region by the jobs proximity index, in general one can conclude that the census tracts with the highest index values are those located near major roads, particularly Interstate 75 running from the Northwest to the Southeast, Route 26 running from West to East, and Route 24, running from South to Northeast. Residential proximity to these major transportation routes offers residents greater access to jobs than do areas relatively disconnected from these roadways.

Layering demographic information onto the Jobs Proximity Index map assesses the degree to which residential living patterns impact the protected classes and their ability to access jobs. The HUD map presents the living patterns of different racial/ethnic persons living in Gainesville, R/ECAPs and the region overall.

In the following analysis, the residential living patterns of racial/ethnic populations, national origin, and families with children is assessed.

City of Gainesville

When examining the job proximity index values for the different racial/ethnic categories, one can generally state that Whites are spatially dispersed across the City, with the exception of East Gainesville. Census tracts in East Gainesville, particularly those resting on the Eastern boundary of the City, have the lowest density of Whites in all census tracts in the City. When looking at African Americans, the opposite is true; there are high concentrations of African Americans living in East Gainesville, particularly in census tracts East of Route 441 (NW 13th St). As discussed earlier, East Gainesville has census tracts with lower job proximity index values, meaning a disproportionate number of African Americans are living in areas with poor access to jobs.

When examining residential living patterns by national origin in the City, one can identify two “hotspots” for national origin populations in Gainesville: South Gainesville (areas south of NW 8th Avenue) and in Northwest Gainesville (generally North and West of NW 53rd Avenue). The first area has a concentration of Asian-origin nations, including China and India. The second area has higher concentrations of American-origin nations, including Cuba and Mexico. It is important to note that these areas are not dominated by census tracts with high jobs proximity index values, although there is a diversity in values, making it difficult to conclusively state that these national origin populations are excluded from high proximity index value neighborhoods.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the City.

Alachua County- Gainesville CBSA

When examining the job proximity index values for the different racial/ethnic categories, one can generally state that Whites are geographically dispersed across the County, with a disproportionate number of Whites living West of the City. For African Americans, one recognizes a general concentration in City limits, with far fewer African American families living in the County. Those that do live in the County are few, and are geographically dispersed. Hispanics are also typically concentrated in Gainesville, with those living in the County generally living West and Southwest of the City. Because the region to the West of Gainesville has census tracts with high jobs proximity index values, families living in that area have greater access to jobs. For the other racial/ethnic categories, it is difficult to discern notable spatial living patterns.

When examining residential living patterns by national origin in the County, one can generally state that the County does not have high concentrations of these families. In general, one sees concentrations of national origin families located to the West of Gainesville, and to the South. It is difficult to discern particular trends in the location of these families, with the exception American-origin families (Cubans and Colombians) – these families appear to be generally located in underdeveloped census tracts to the Southwest and West of the City. These areas, particularly census tracts to the Southwest of the City, have particularly low values on the jobs proximity index.

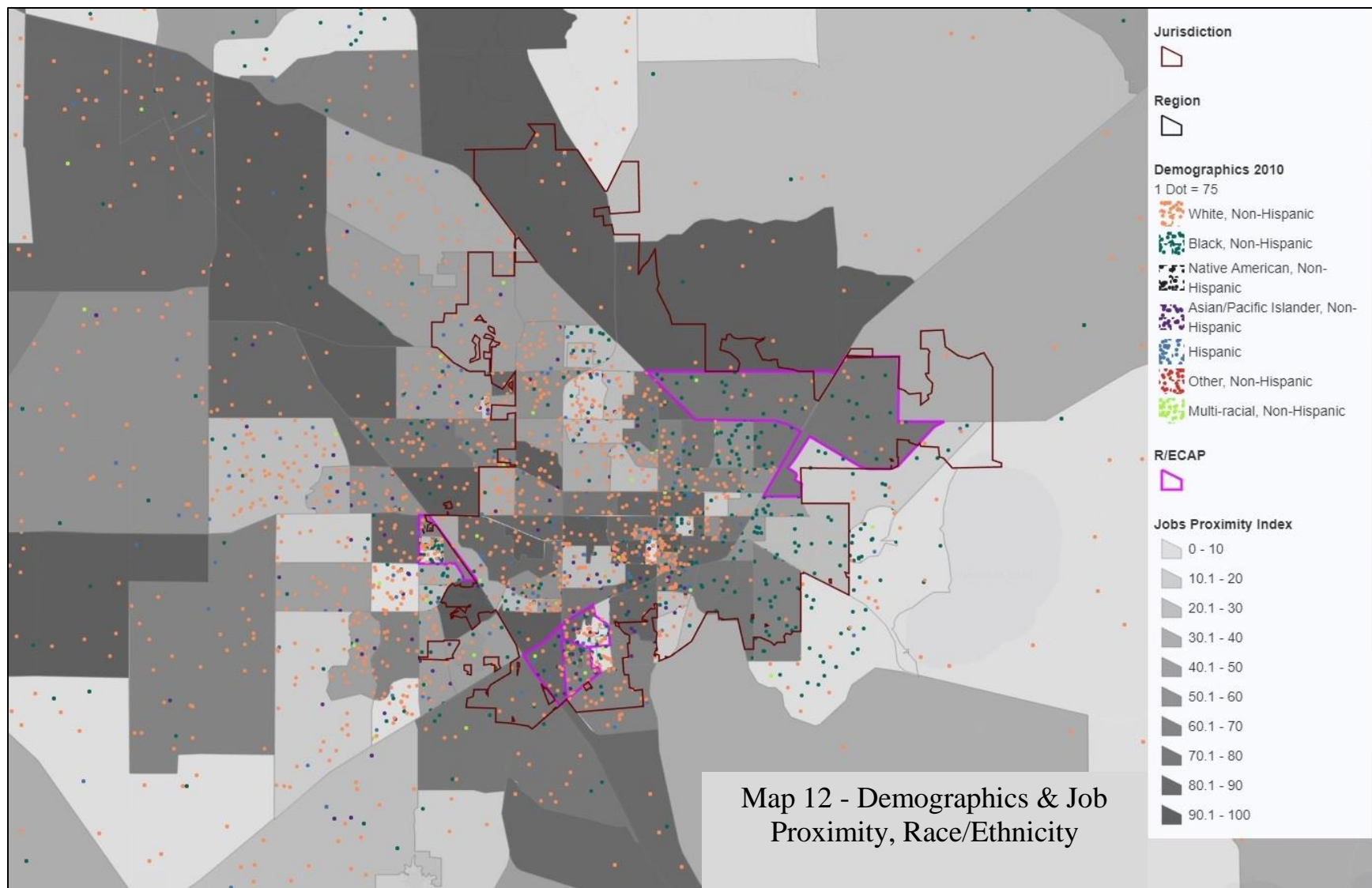
Upon reviewing the data on familial status within the County, it is difficult to discern notable patterns or concentrations of family households related to the proximity index. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the County.

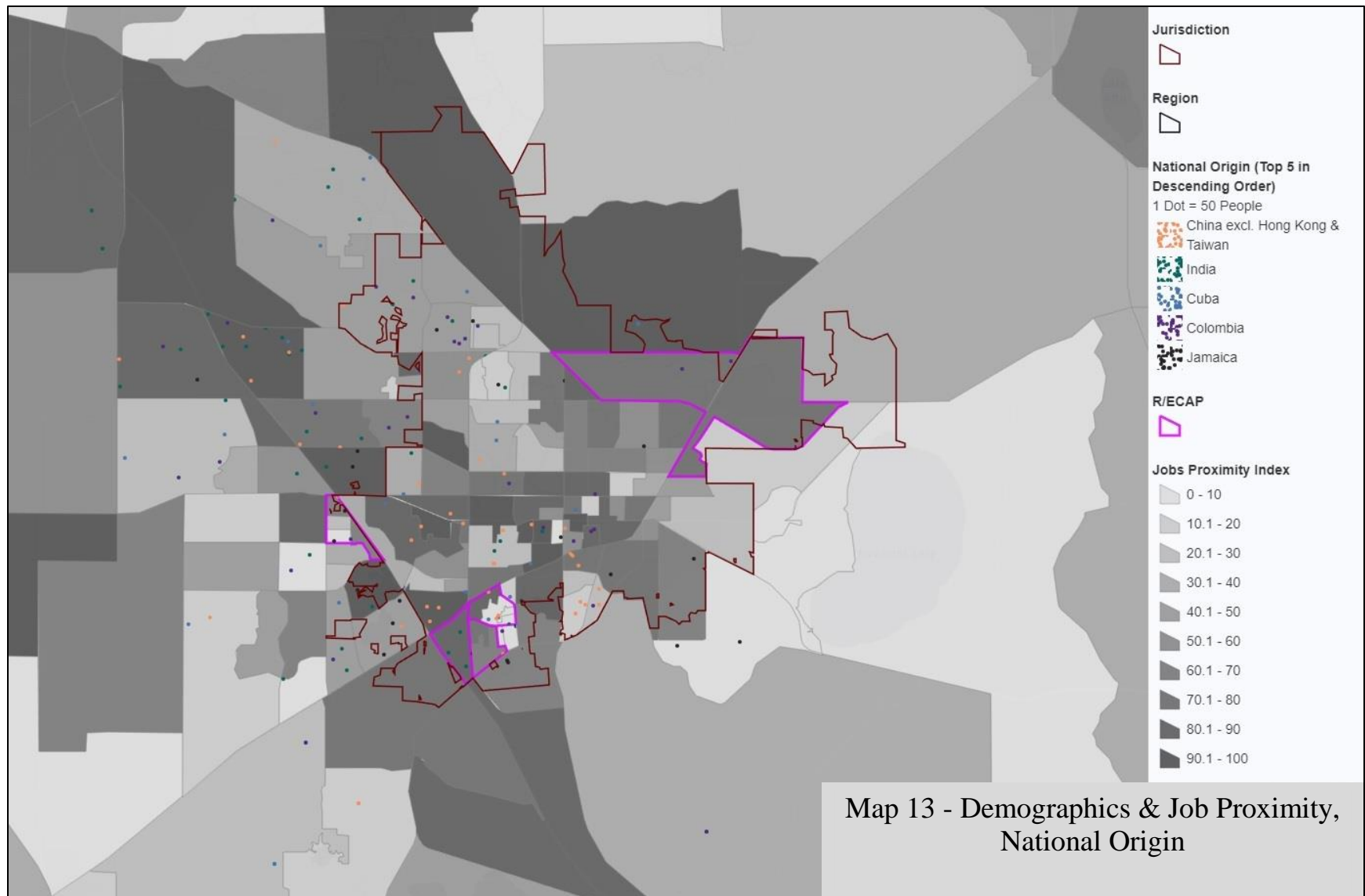
R/ECAPs

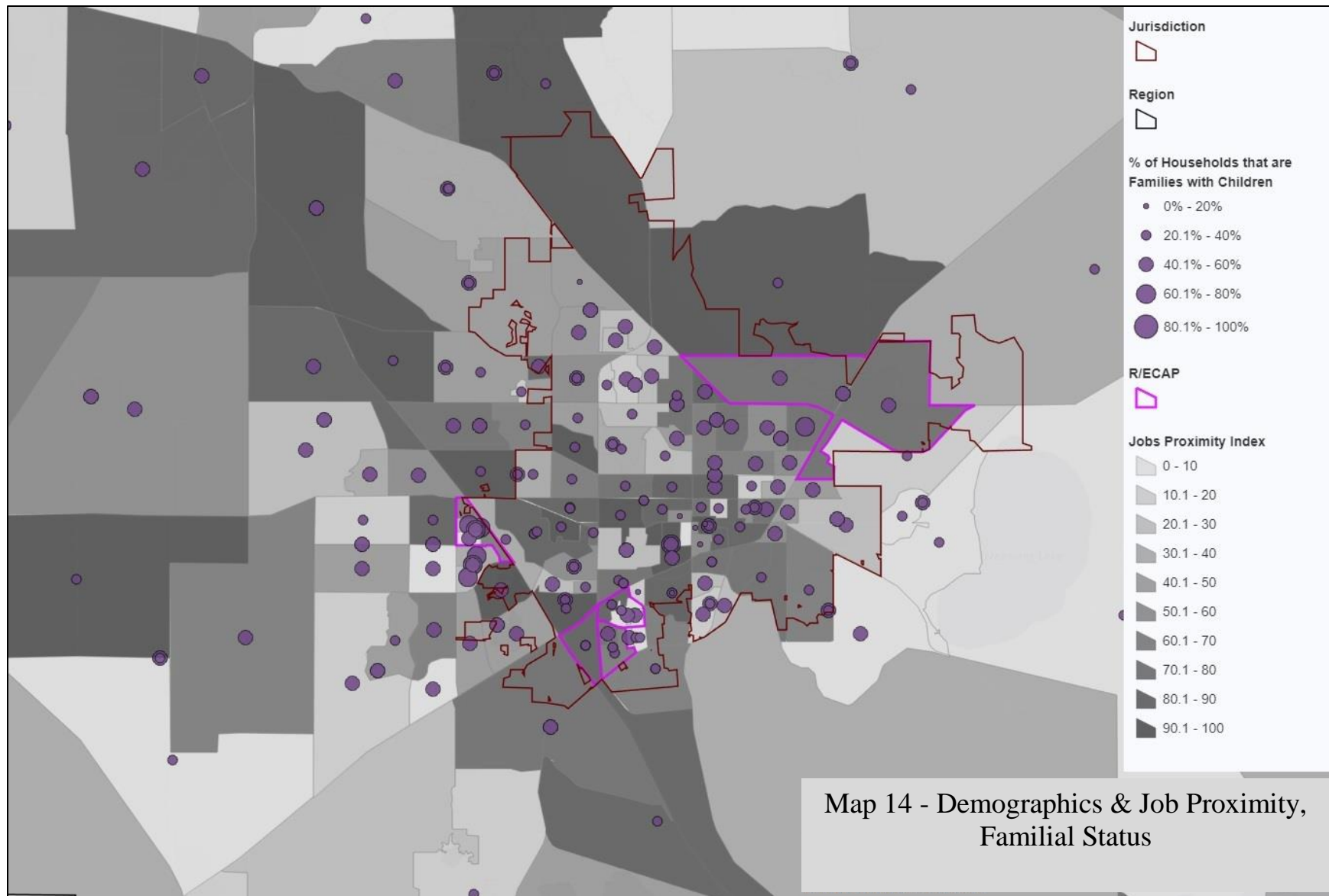
The Tower Rd / I-75 Corridor R/ECAP, just to the West of Interstate 75, has high concentrations of African Americans. This R/ECAP has a relatively high proximity index value (67), indicative of its close proximity to strong job markets in surrounding neighborhoods. The SW Student Housing Corridor R/ECAP also enjoys relatively high index values, and has a diverse mix of racial/ethnic groups. The Waldo Road Corridor has a majority African American population (57%), and enjoys relatively high jobs proximity index values (75).

Relative to the region overall, there appears to be concentrations of national origin population within the region's R/ECAPs, particularly for the SW Student Housing Corridor R/ECAP cluster within the City, and in the Tower Rd / I-75 Corridor R/ECAP. The SW Student Housing Corridor enjoys strong job proximity index values, while the Tower Rd / I-75 Corridor has lower values.

The Tower Rd / I-75 Corridor R/ECAP, just to the West of Interstate 75, has high concentrations of families with children. This R/ECAP also suffers from low scores on the school proficiency index. The Tower Rd / I-75 Corridor has lower values. The other R/ECAP areas, including the SW Student Housing Corridor and the Waldo Road Corridor, do not have notably large percentages of families with children.







Labor Market

Assessing the labor market index map shows that for the County, the strongest labor market census tracts are located to the West of Gainesville. For the City, the strongest labor market census tracts are located on the West side, with a single dark shaded census tract to the South (84 value on the index), just to the North of Bivens Lake. Areas on the East side of Gainesville, and to the East of the City, have the lowest labor market index values in the region.

In the following analysis, the residential living patterns of different racial/ethnic households, national origin, and families with children is assessed.

City of Gainesville

When examining residential living patterns relative to the labor market index, it becomes clear that African Americans are concentrated on the City's Eastern census tracts, a broad stretch of the city with low values on the labor market index. Whites, on the other hand, enjoy access to high value labor market neighborhoods, with concentrations in the City's Northwest and West. The City's Hispanic population has concentrated clusters in the center of the City, along University Avenue between SW 23rd St and North Main St. This region is marked by low values on the labor market index. It is difficult to discern notable concentrations of the remaining ethnic/racial groups not mentioned here – there is broad geographic dispersion of those populations across the City.

As discussed earlier, Gainesville has concentrations of foreign born families primarily located in its Southern census tracts. In particular, Gainesville has a high concentration of Chinese in the City's Southern census tracts, particularly the community to the North and East of Bivens Lake. These communities show significant range in labor market index values, ranging from 29 to 84.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the City.

Alachua County – Gainesville CBSA

When examining residential living patterns relative to the labor market index, it becomes clear that Whites enjoy access to the region's strongest labor markets to the West and Northwest of the City. African Americans, on the other hand, have high concentrations to the City's East. Asians/Pacific Islanders primarily live in areas South and West of the City, areas marked by higher than average values on the labor market index. It is difficult to discern notable concentrations of the remaining ethnic/racial groups not mentioned here – there is broad geographic dispersion of those populations across the County.

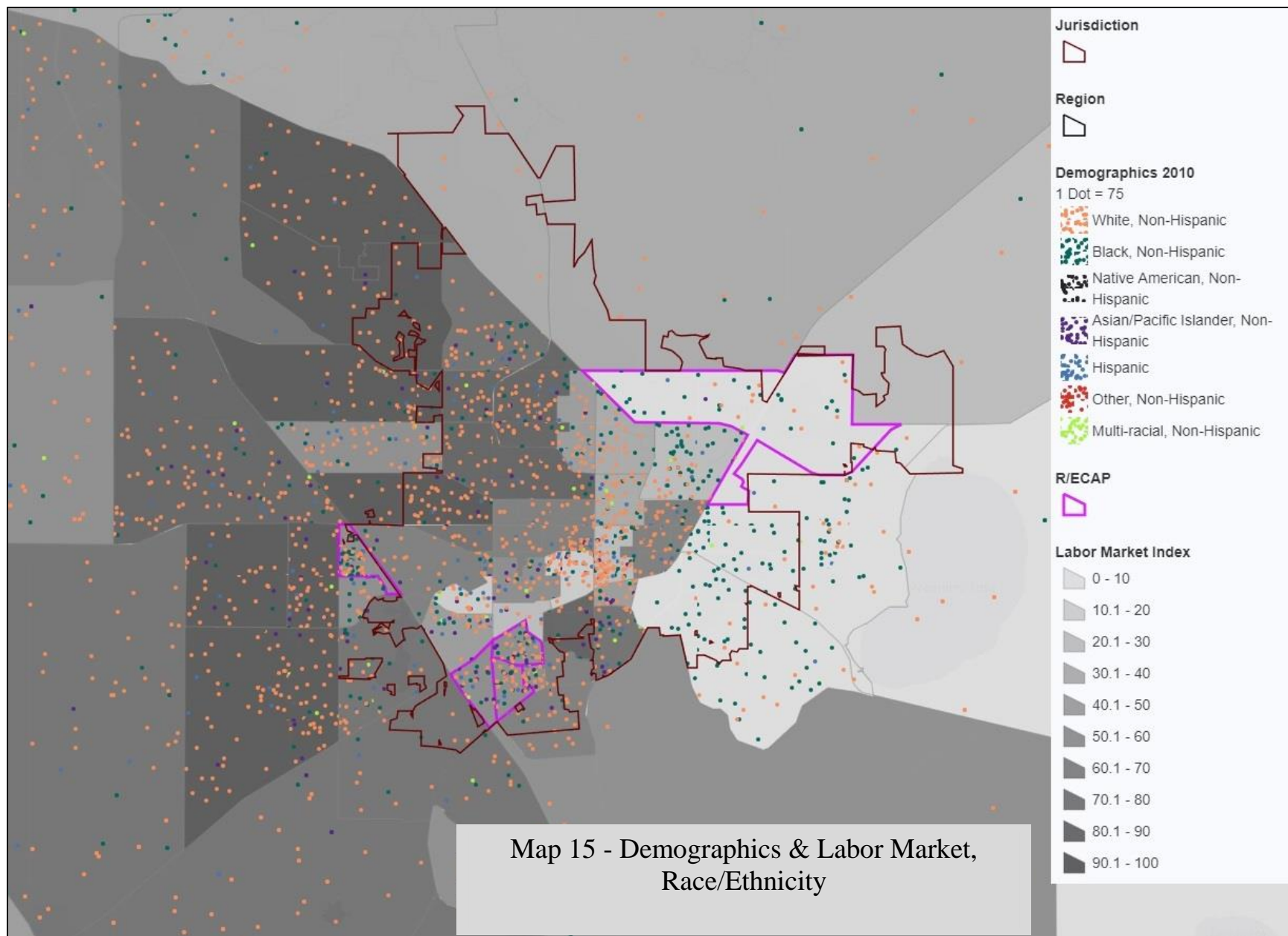
Alachua County does not have significant populations of foreign born persons within its borders. That said, there appear to be clusters of persons by national origin in the City's suburban ring to the Northwest, West, and Southwest of the City. These communities enjoy relatively high values on the labor market index.

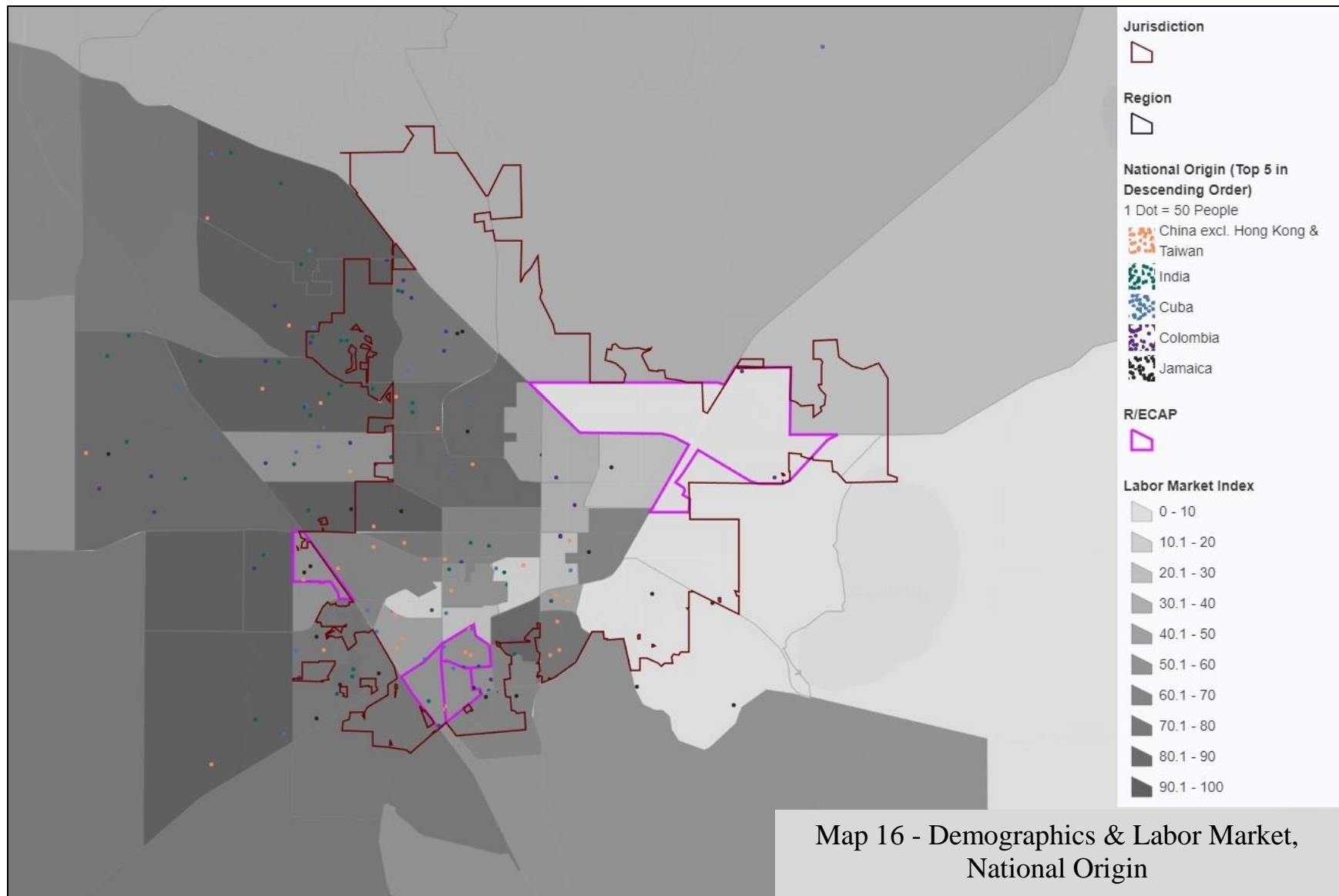
Upon reviewing the data on familial status within the County, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the County.

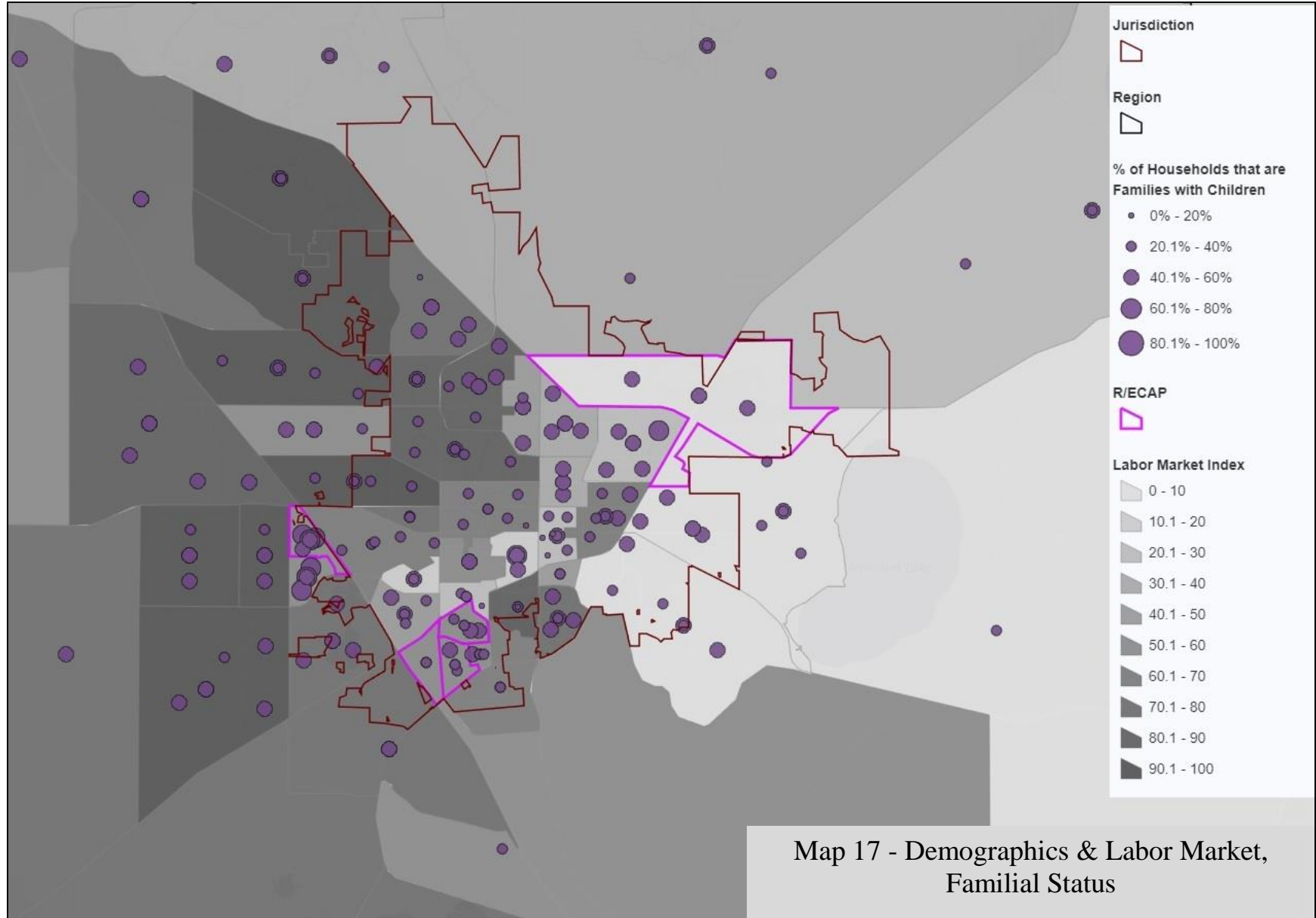
R/ECAPs

The Tower Rd / I-75 Corridor R/ECAP, just to the West of I-75, has high concentrations of African Americans. This R/ECAP has a relatively high labor market index value (60), indicative of its close proximity to strong job markets in surround neighborhoods. The SW Student Housing Corridor R/ECAP also enjoys relatively high index values, and has a diverse mix of racial/ethnic groups. The Waldo Road Corridor has a majority African American population (57%), and has one of the region's lowest labor market values (9).

The Tower Rd Corridor R/ECAP has high concentrations of families with children. This R/ECAP also suffers from low scores on the school proficiency index. The Tower Rd / I75 Corridor has high labor market values. The other R/ECAP areas, including the SW Student Housing Corridor and the Waldo Road Corridor, do not have notably large percentages of families with children.







- iii. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.*

Through extensive community consultation, participation, and outreach, no specific programs, policies, or funding mechanisms negatively impact access to employment. Conversely, there are many programs available to residents, and for members of the protected classes, to strengthen job skills. The fundamental concern, as reported through consultation and outreach, is a general lack of jobs in East Gainesville, and high concentrations of service sector jobs in West Gainesville. This reality forces persons living in more affordable communities in East Gainesville to commute across town to low-paying jobs near the University of Florida and wealthier suburban communities to the West.

c. Transportation

- i. *For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.*

Access to transportation is often directly linked to poverty. Without access to reliable transportation many, specifically low-income persons and protected classes, are unable to obtain employment or even have access to affordable housing. Transportation is a critical component to achieving self-sufficiency. Disparities in access to transportation based on place of residence, costs, or other related factors greatly decrease the ability to rise out of poverty.

An analysis of the transit trips index and low transportation costs index and a review of HUD maps identifying demographics related to transit trips and costs allows for identification of disparities in access to transportation. For the purpose of this analysis, and as defined by HUD, the transit trips index measures how often low-income families in a neighborhood use public transportation. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

The low transportation cost index measures cost of transportation and proximity to public transportation by neighborhood. For the transportation cost index, the higher the value, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

Table 12 Transit Trips Index and Low Transportation Cost Index				
Race/Ethnicity	City of Gainesville		Alachua County – Gainesville CBSA	
	Transit Index	Transportation Cost Index	Transit Index	Transportation Cost Index
White, Non-Hispanic	75.51	55.23	51.96	39.70
Black, Non-Hispanic	72.88	51.18	60.94	43.89
Hispanic	78.57	59.11	63.69	48.37
Asian or Pacific	79.14	59.95	69.36	51.00

Islander, Non-Hispanic				
Native American, Non-Hispanic	75.83	55.40	50.64	40.13
Population below federal poverty line				
White, Non-Hispanic	82.47	61.85	67.52	50.79
Black, Non-Hispanic	73.08	50.89	63.93	45.88
Hispanic	80.80	60.74	68.68	52.93
Asian or Pacific Islander, Non-Hispanic	82.95	61.64	81.62	60.38
Native American, Non-Hispanic	74.38	53.32	63.90	41.60
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>				
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

The index table also provides a review of the difference in index values between the population above the federal poverty level (FPL) and below the FPL. Negative values indicate the population above the federal poverty level is more likely to use public transit and have access to affordable transit than does the population below the poverty level. Positive values indicate the population above the federal poverty level is less likely to use public transit and has worse access to affordable transit than does the population below the poverty level.

Table 13 Difference in Transit and Low Transportation Cost Index Values Between Poverty and Non-Poverty Race/Ethnic Populations				
Racial/Ethnic Category	City of Gainesville		Alachua County – Gainesville CBSA	
	Transit Trips Index	Low Transportation Cost Index	Transit Trips Index	Low Transportation Cost Index
White, Non-Hispanic	6.96	6.62	15.56	11.09
Black, Non-Hispanic	0.20	-0.29	2.99	1.99
Hispanic	2.23	1.63	4.99	4.56
Asian or Pacific Islander, Non-Hispanic	3.81	1.69	12.26	9.38
Native American, Non-Hispanic	-1.45	-2.08	13.26	1.47
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>				
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

City of Gainesville

When examining transit trips index values for Gainesville, Asians/Pacific Islanders have the highest value (79.14), indicating that population is the most likely to use public transit, while African

Americans have the lowest value (72.88). The difference between the highest and lowest index values is not significant, making it difficult to draw meaningful conclusions regarding the availability of public transit services relative to each racial/ethnic group.

The difference in transit trips index values shows that in all cases except for Native Americans, persons living under the poverty level are more likely to use public transit in the City compared to persons living above the FPL. The largest difference can be seen for Whites (6.96), indicating income functions as a significant factor in the likelihood for a White person to utilize public transportation. Given that the index controls for income, differences between the population above the poverty level and below the poverty level are more likely to be due to residential living patterns and accessible transit opportunities. There is only a .20 value difference for African Americans – indicating that this group has largely the same likelihood of using public transit, regardless of poverty status.

When examining the low transportation cost index, once again Asians/Pacific Islanders have the highest value (59.95), and African Americans have the lowest (51.18), indicating Asians/Pacific Islanders have the greatest access to low cost transportation, and African Americans have the least. Given that the low cost transportation index is a function of a variety of density and commercial characteristics of each census tract, it is likely that Asians/Pacific Islanders live in more dense communities accessible to services and jobs than do African Americans families.

The difference in low transportation cost index values shows there is significant disparity in the White population (6.62), indicating the White population below the FPL has greater access to affordable transit options compared to its wealthier cohort. This may be due to low densities in wealthy White-majority neighborhoods. For the other racial/ethnic categories, African Americans and Native Americans are the only populations with a negative value, indicating the wealthier population cohorts have greater access to affordable transportation options.

Alachua County – Gainesville CBSA:

When examining transit trips index values for Alachua County, Asians/Pacific Islanders are the most likely to use public transportation (69.36), while Native Americans are the least likely (50.64). Unlike in Gainesville, the difference between the highest and lowest values on the index indicate greater disparities in access to public transportation. This is most likely due to the County's built environment – exurban and rural communities struggle to provide reliable public transportation.

The difference in transit trips index values shows the differences in values is far greater than seen in the City. This indicates that the likelihood of each population to use public transit is related to neighborhood density and access to commercial opportunities. It is worth noting that the differences for African Americans (2.99) and Hispanics (4.99) are the lowest, suggesting that even populations above the poverty line for these racial/ethnic groups are not living in communities with superior access to affordable transit options.

When examining the low transportation cost index for Alachua County, Asians/Pacific Islanders enjoy the highest value (51.00), and Whites have the lowest value (39.70). The value for Whites is an interesting result, most likely due to the spatial dispersion of the White population across the largely exurban and rural census tracts of Alachua County. The other racial/ethnic categories, Hispanics,

Native Americans, and African Americans have relatively equitable values on the index. This likely reflects the residential living patterns of these populations in the suburban ring to the Northwest, West and Southwest of Gainesville.

The difference in low transportation cost index values shows all values on the table are positive, indicating that the populations for all racial/ethnic categories living below the poverty line have greater access to affordable transit options. This may be due to the built environment in low-income communities having greater density compared to higher income communities. It is worth noting that Native Americans (1.47) and African Americans (1.99) have the lowest difference in values.

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

In addition to table data for the transit trips and low transportation cost indices, HUD offers maps with the same data layered with demographic variables for race/ethnicity, national origin, and familial status. Mapping of this kind offers a prime opportunity to examine residential living patterns in the City of Gainesville and in Alachua County. The analysis included below first addresses the transit trips index, followed by the low transportation cost index. Darker shaded areas in the map represent census tracts with higher values and lighter shaded areas in the map represent census tracts with lower values on the index.

Transit Trips

Upon reviewing the transit trips index mapped to the region, it becomes readily apparent that census tracts with the highest values are within the City of Gainesville, and in neighboring County census tracts to the Northwest, West, and Southwest. These areas are valued higher on the transit trips index due to greater development, higher densities in the built environment, and more commercial activity. All of these conditions improve the utility of each transit use, thus increasing the index values for those areas. Within the City, there is relatively even dispersion of high- and low-value index census tracts, although tracts in East Gainesville tend to be lower than the values in other parts of the City. Outlying census tracts in the County, those furthest from the City, have some of the lowest index values in the region. This is likely due to a lack of transit service in these areas.

City of Gainesville

Upon examining racial/ethnic data relative to the transit trips index in the City of Gainesville, there is ample evidence for the relatively even distribution of values for each racial/ethnic category discussed in the table at the beginning of this section. Much of the City has high values on the index, reaching as high as a value of 93 in the City's core. It is worth noting that certain census tracts in the Southern portion of the City also score in the 90s. These southern neighborhoods have high concentrations of Asians/Pacific Islanders and Hispanics. Given the relative parity in index values by census tracts across the City, it is not possible to make a solid conclusion regarding fair housing barriers by race/ethnicity.

Given the fact that there is parity in values by census tract in the City, it is difficult to discern notable patterns in disadvantageous residential living patterns by national origin. With that said, there does appear to be a concentration of Chinese and Cubans in the City's southern neighborhoods – areas with

some of the highest transit trip index values in the City. Given these trends, there does not appear to be a fair housing concern related to the transit trips index and the City's population by national origin.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the City.

Alachua County – Gainesville CBSA

Upon examining racial/ethnic data relative to the transit trips index in the County, one notes that the White population is heavily represented in the County's census tracts furthest from the City. These tracts are, in general, valued lower on the transit trips index due to the lack of development and low densities in the built environment. Further, the other racial/ethnic categories, including Hispanics, Asians/Pacific Islanders, and African Americans, generally live closer to the City. Given this analysis, it is not possible to make a conclusion regarding fair housing barriers by race/ethnicity in the County.

A significant majority of the County's foreign born population lives in the census tracts to the Northwest, West, and Southwest of the City. As discussed before, these census tracts have some of the highest index values for the region. In the more rural census tracts, one sees Cubans and Mexicans, indicating there may be a fair housing concern related to the ability for these two groups to afford homes in the more developed neighborhoods closer to the City.

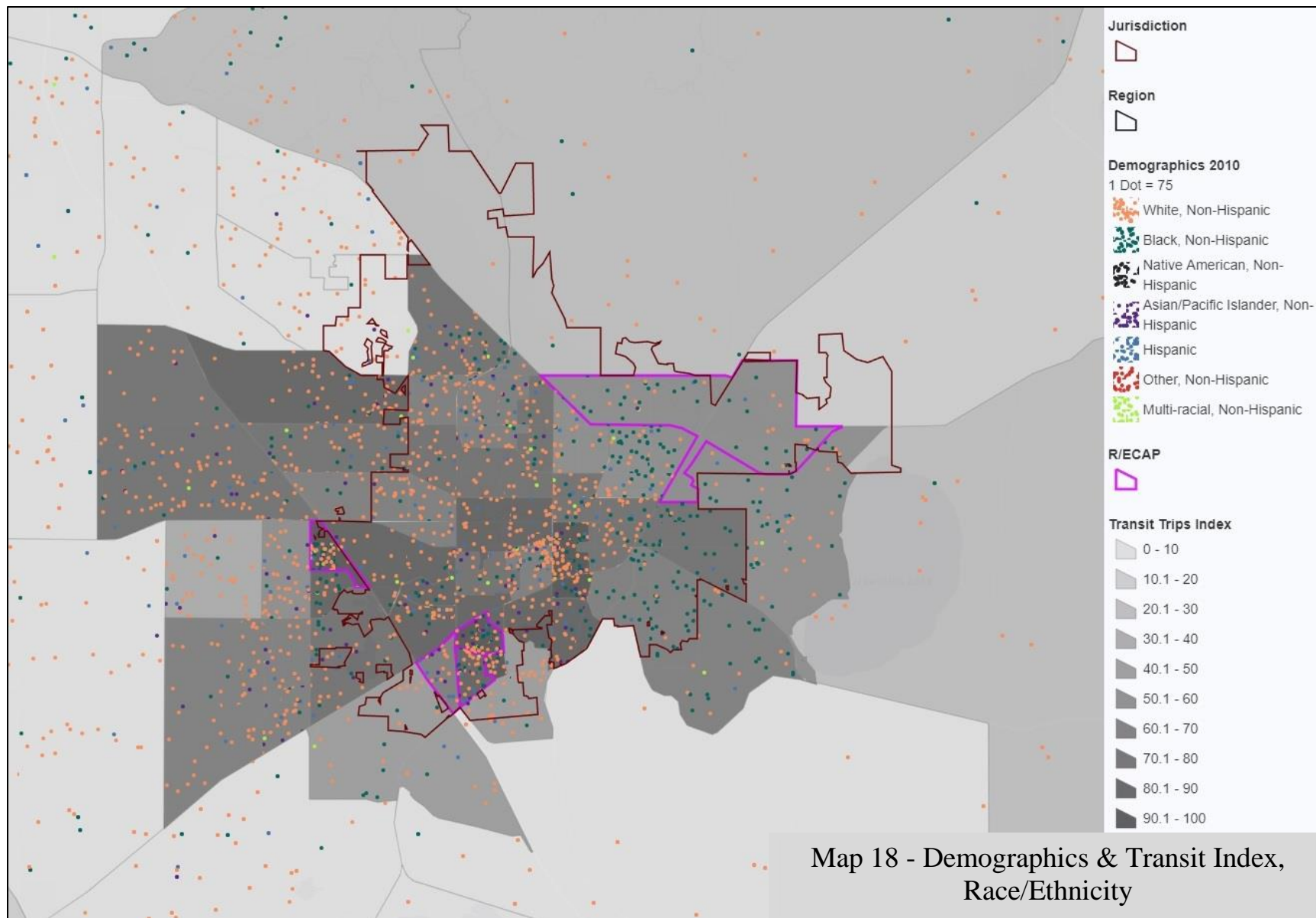
Upon reviewing the data on familial status within the County, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the County.

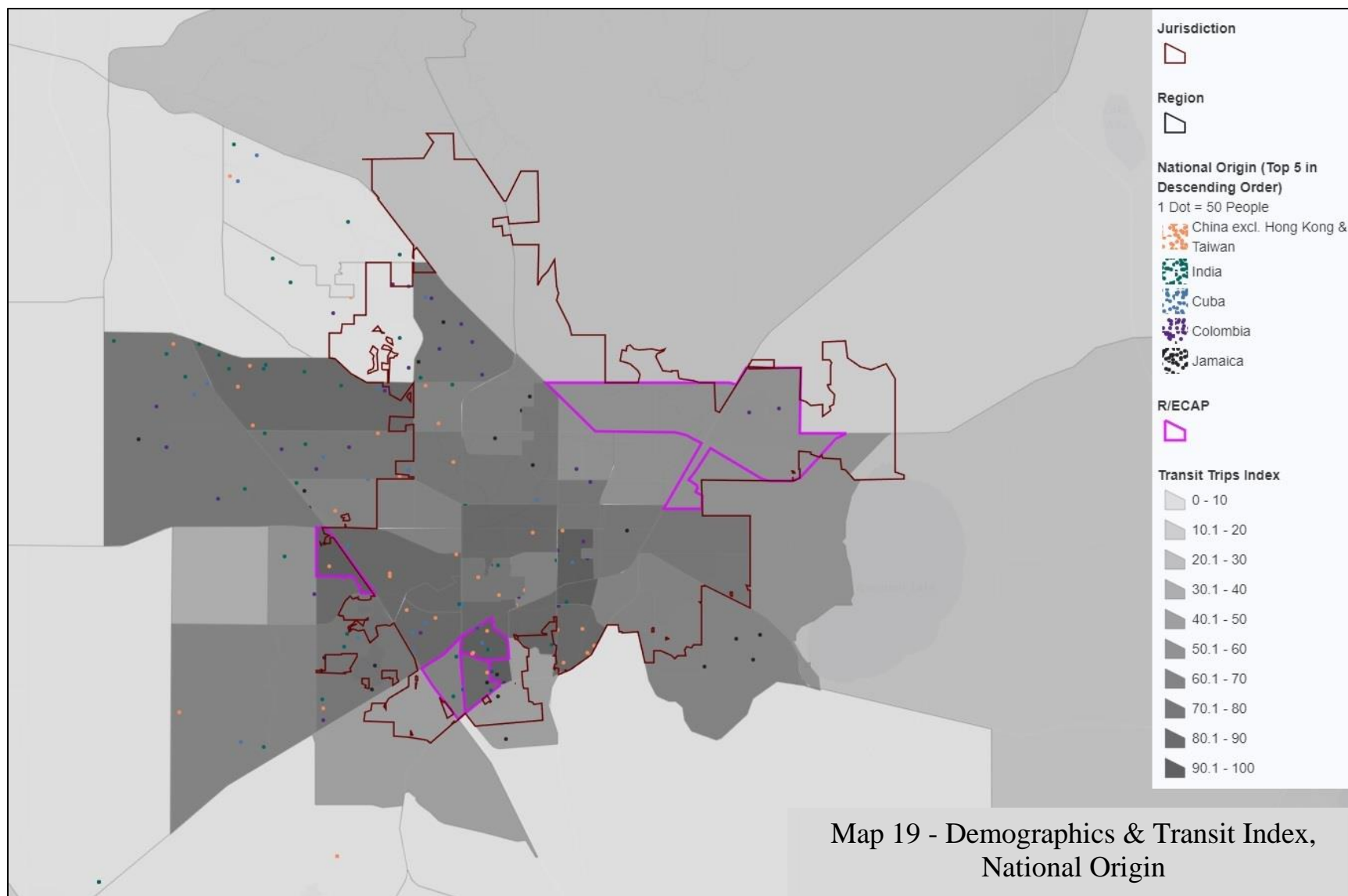
R/ECAPs

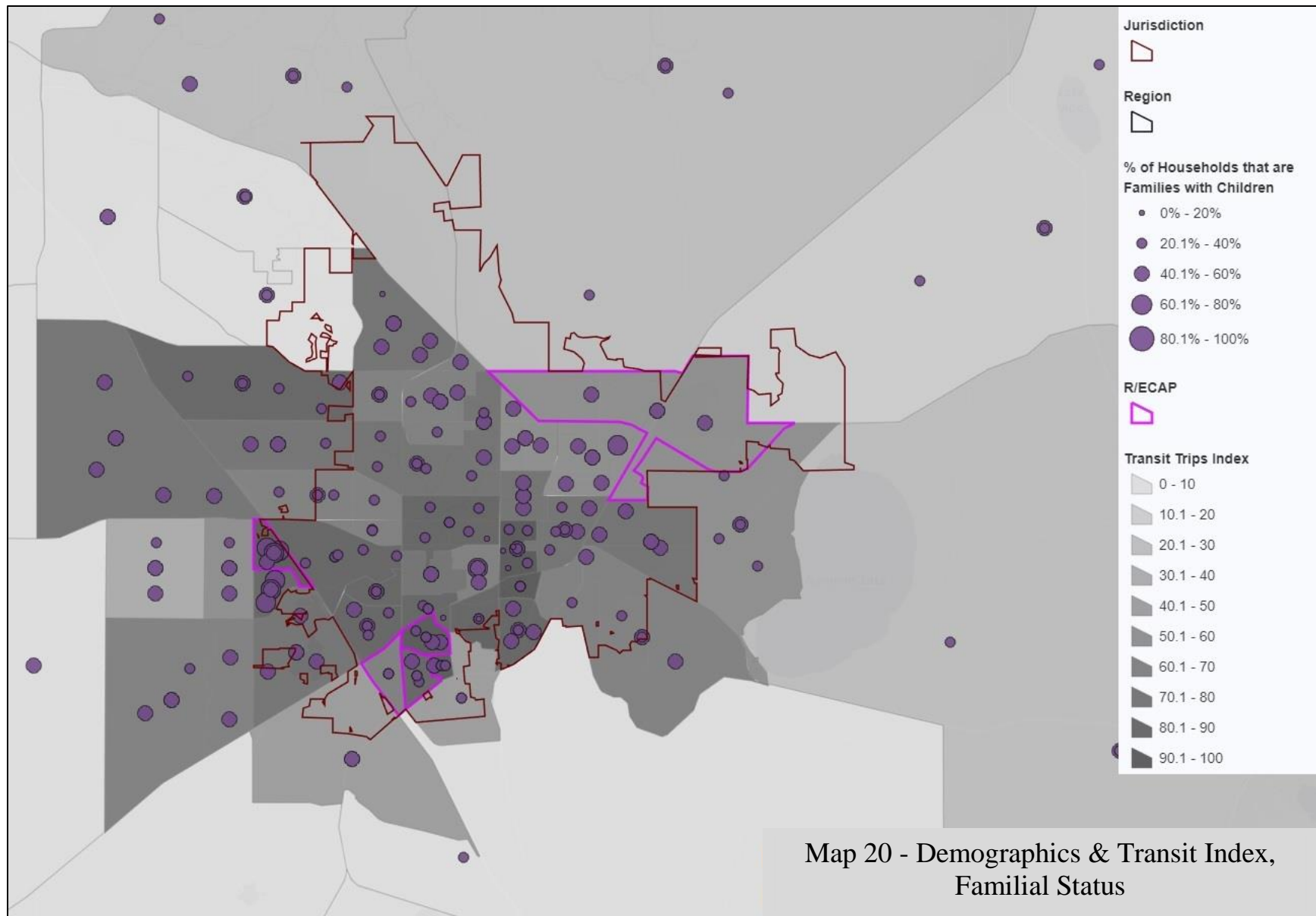
The Tower Rd R/ECAP has a high transit trips index value (85), reflective of its proximity to the highly developed areas in West Gainesville and in Alachua County. The SW Student Housing Corridor also has high transit trips index values (63, 90, 91), given the density of services and built environment there. Finally, the Waldo Rd Corridor has a lower index value (55), which poses a concern related to access to opportunity for the City's African American population.

Given the above mentioned trends, there does not appear to be a fair housing concern related to the transit trips index and the region's R/ECAP communities by national origin.

Data does not provide information to make a conclusion related to fair housing concerns related to the transit trips index and familial status.







Low Transportation Costs

Upon examining the low transportation cost index mapped at a regional level, one can see three broad hotspot areas. The first hotspot is in the City's urban core, Northeast of the University of FL campus. The second hotspot is in the City's southernmost neighborhoods, to the East of Interstate 75, including the SW Student Housing Corridor R/ECAP cluster. The third hotspot is just outside of the City's Northwest boundary, just north of Route 222 and East of Interstate 75. These communities score highest on the transportation cost index due to density of the built environment and diversity of commercial opportunities.

The analysis below discusses trends for both the City of Gainesville and Alachua County – Gainesville CBSA regarding the low transportation cost index.

City of Gainesville

Upon examining the two hotspots (discussed above) in the City, there seems to be relative parity between the different racial/ethnic groups in locating in those particular neighborhoods. It should be noted that there are high concentrations of African Americans living in East Gainesville, much of which has census tracts with relatively lower values on the index.

In general, one can state that national origin populations in the City are primarily located in the southern neighborhoods. These communities also benefit from high values on the transportation cost index. Given this assessment, there does not appear to be a fair housing barrier related to access to low transportation cost neighborhoods in the City based on national origin.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the City.

Alachua County – Gainesville CBSA

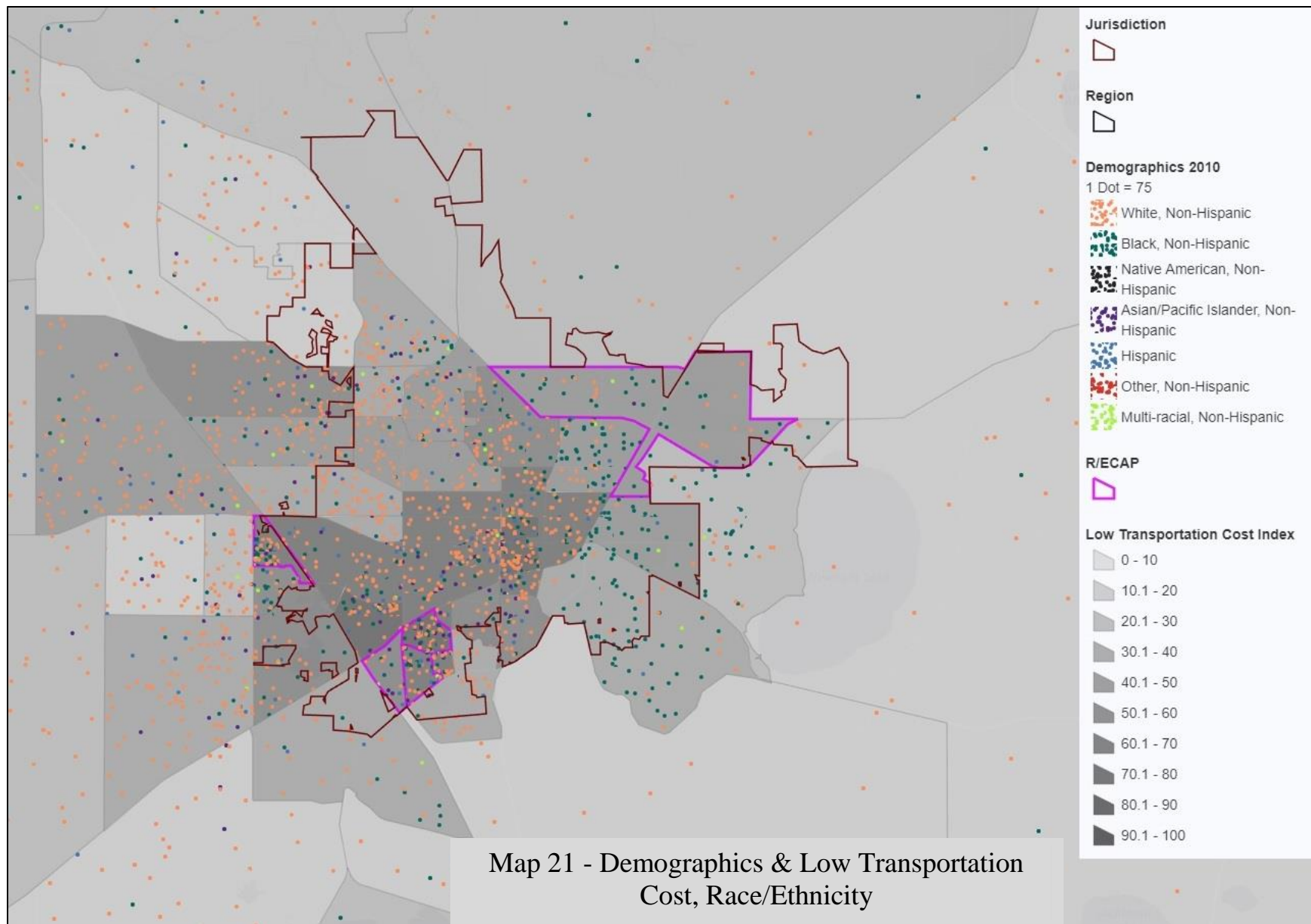
Upon examining the low transportation cost index in Alachua County, there appears to be widespread dispersion of both Whites and African Americans across the County's census tracts with the lowest values on the index. Alternatively, Asians/Pacific Islanders and Hispanics have concentrations in the County's suburban ring to the Northwest, West, and Southwest of the City. It is difficult to make conclusions regarding fair housing concerns related to access to transportation.

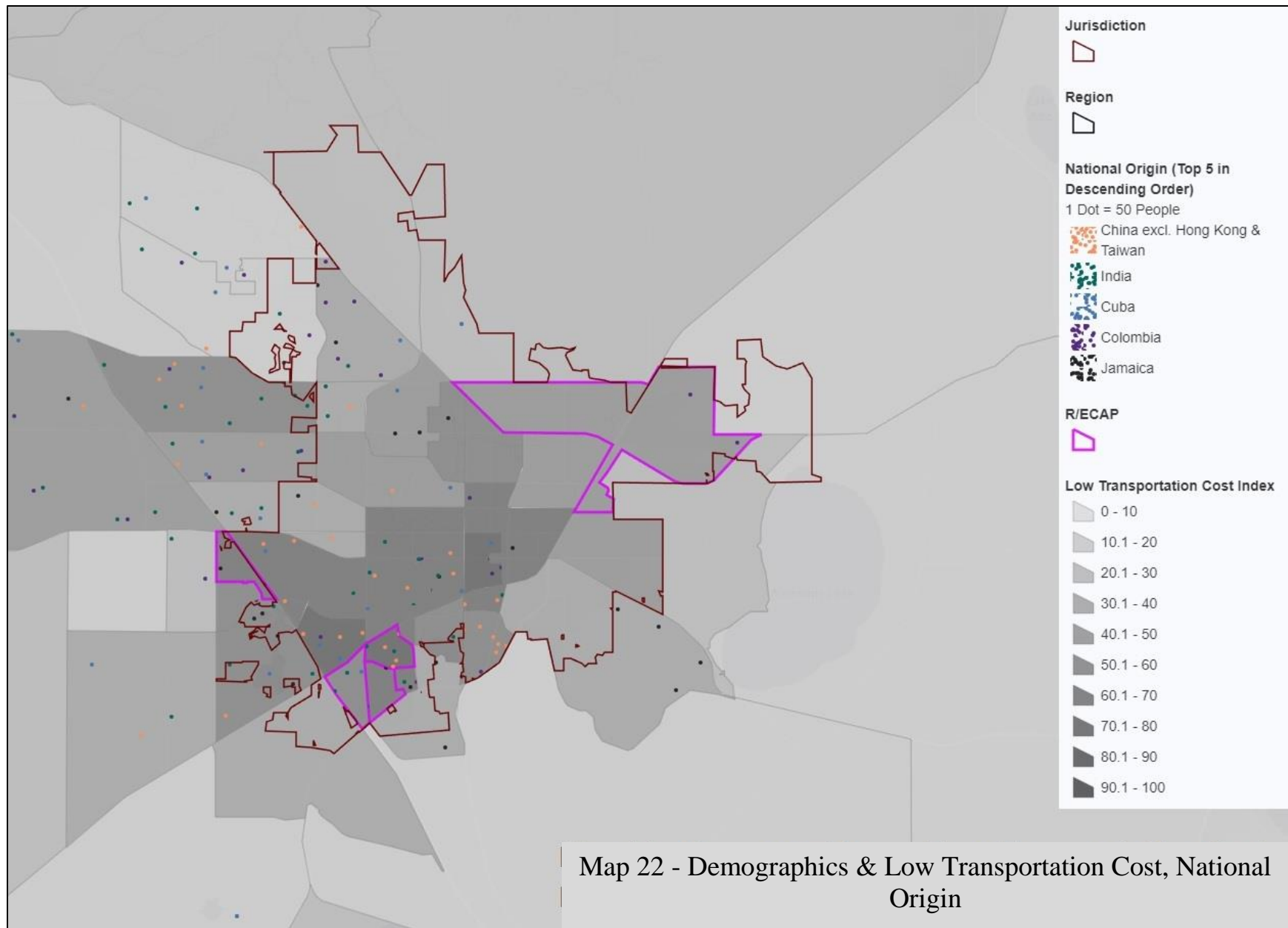
In general, one can see national origin populations located primarily in the County's communities just to the West of the City. These census tracts have high values on the index. It is worth noting that there appears to be concentrations of Chinese, Mexicans and some Filipinos in a census tract South and West of the City. This community has a low value on the index (20), indicating there may be some concern with these populations having access to higher index value communities.

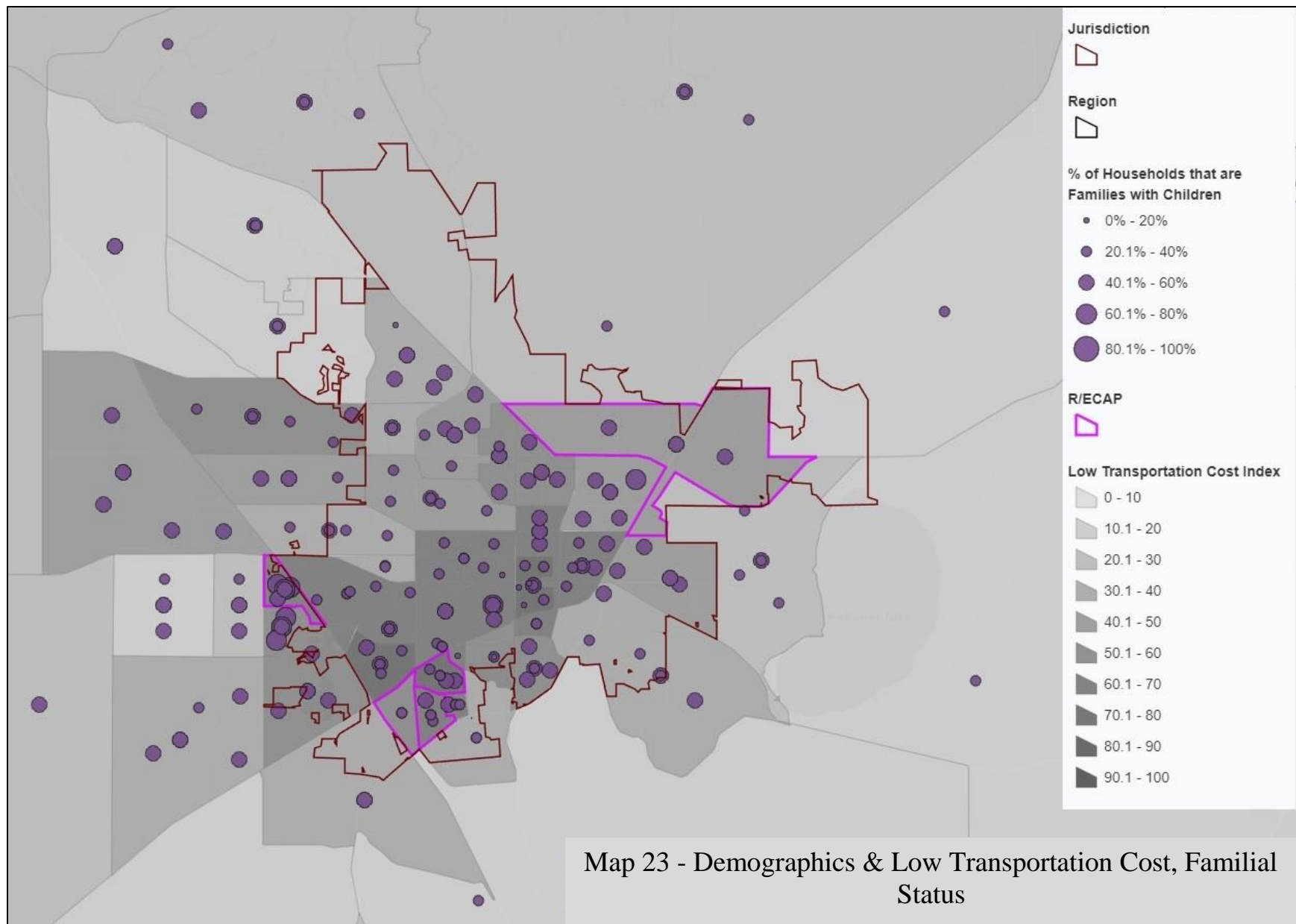
Upon reviewing the data on familial status within the County, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status in the County.

R/ECAPs

The trends reported for the R/ECAPs for the low transportation cost index mirror those noted for the transit trips index, above. This is expected, given the linked nature of the two indices. The Tower Rd R/ECAP has a relatively high Low Transportation Cost index value (67), reflective of its proximity to the highly developed areas in West Gainesville and in Alachua County. The SW Student Housing Corridor also has relatively high Low Transportation Cost index values (60, 68, 72), given the density of services and built environment there. Finally, the Waldo Rd Corridor has a lower index value (42).







- iii. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.*

Community consultation revealed a near-universal concern with the frequency and reliability of public transportation in the region, particularly for East Gainesville and in outlying communities in Alachua County. Additionally, the public expressed concerns related to a lack of subsidies for low- and moderate-income families, the elderly, and for the disabled.

Any analysis of transit service related to fair housing must consider availability of service during nontraditional hours. In particular, service during weekends, early mornings, and late evenings is essential. These nontraditional times are of particular concern for low-income residents, a population disproportionately represented by protected class members, due to overnight work hours, late or early shifts, and weekend shifts. Any transit system with reduced operating hours during these non-traditional hours, present increased hurdles for certain individuals who need transportation during those hours.

A review of bus routes offered by the Gainesville area's regional bus operator (Regional Transit Systems (RTS)) reveals a considerable reduction in service operation during nontraditional hours. For instance, during the Fall 2017 schedule, 23 out of 40 bus routes have no service on weekends whatsoever, and the remaining routes have reduced service (less frequent arrivals).

All transit authorities struggle to provide comprehensive route coverage in rural and lower population areas. This is due to the expected usage rates in low-density, low-population communities. Funding has also guided the provision of public transportation services in the County, and because of RTS's funding character, the focus of public transportation tends to be in the university area. For RTS to provide coverage in rural communities, significant additional subsidy would have to be provided to make the new routes financially feasible.

Consultation with RTS revealed long-term planning around a number of challenges facing low-income, protected class members, and East Gainesville residents. At the time this report was written, RTS is evaluating a First Mile/Last Mile pilot program to connect low-income residents and rural residents with RTS routes by offering door-to-station transit service. The program proposes to use a 12-seat van that can easily maneuver on narrow residential streets, and do not cause other noise and pollution concerns as large buses.

RTS has also planned for construction of the Five Point Transfer Station, with the purpose of easing transfer wait times, and facilitate East-to-West travel across the RTS system. This transfer station would alleviate many of the concerns related to East Gainesville residents having to travel to the West side of town to reach employment.

RTS also plans to extend express bus services to county residents in the Alachua / High Springs corridor, Newberry, Archer, Hawthorne and Waldo communities. These services would assist in expanding employment opportunities for the low income and minority members of Alachua County.

It should be noted that RTS regularly cooperates with both the City and County. In the County, Alachua County Community Support Services provides monthly passes for free use of RTS routes to persons it serves who are looking for work or starting a new job, and also provides one day passes to persons with

an emergency. The Center for Independent Living also provides passes to persons determined to meet criteria for disabilities which can be used for trips on MV paratransit at \$3 per ride, as well as for free rides on regular RTS buses. Monthly bus passes are also provided to people living, eating, and community to and from GRACE marketplace, and St. Francis House provides full day passes for use on RTS buses.

d. Access to Low Poverty Neighborhoods

- i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.*

Families living in poverty face a range of challenges beyond those experienced by families living above the poverty line: difficulties in accessing good jobs, affording healthy foods, affordable transportation options, and access to both affordable and healthy housing. In terms of fair housing, ensuring the protected classes have access to low poverty neighborhoods is essential to overcoming long-standing patterns of segregation for those of minority race/ethnicity, disability, and familial status.

To assist with analysis of any potential access issues to low poverty neighborhoods, HUD developed a Low Poverty Index which gives an indication of the degree of exposure to poverty in a given neighborhood. Higher scores on the index indicate a community where one can expect to be exposed to less poverty. Inversely, lower scores indicate a community with high exposure to poverty. It is important to note that the scores are percentile ranked nationally, meaning one can gauge the degree of exposure to poverty compared to national averages.

Table 14 Low Poverty Index		
Race/Ethnicity	City of Gainesville	Alachua County – Gainesville CBSA
White, Non-Hispanic	55.52	52.09
Black, Non-Hispanic	34.79	34.35
Hispanic	54.45	52.16
Asian or Pacific Islander, Non-Hispanic	53.92	58.65
Native American, Non-Hispanic	46.57	43.22
Population below federal poverty level		
White, Non-Hispanic	52.06	46.26
Black, Non-Hispanic	29.43	30.08
Hispanic	51.79	48.87
Asian or Pacific Islander, Non-Hispanic	52.25	51.94
Native American, Non-Hispanic	54.36	41.84
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>		
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

In addition, HUD provides index values for the population above the federal poverty level and below the federal poverty level. The distinction between the two groups is important. One would expect to see families living in poverty, regardless of race/ethnicity, to have higher rates of exposure to high poverty neighborhoods than their wealthier counterparts. Assessing the degree to which index values change depending on poverty status for each racial/ethnic category illuminates the degree to which each racial/ethnic group is segregated in high poverty communities. Negative values indicate the population above the federal poverty level has lower exposure to high poverty neighborhoods. Conversely, positive values indicate the population above the federal poverty level is more likely to be exposed to high poverty neighborhoods.

Table 15 Difference in Low Poverty Index Values Between Poverty and Non-Poverty Race/Ethnic Populations		
Race/Ethnicity	City of Gainesville	Alachua County – Gainesville CBSA
White, Non-Hispanic	-3.46	-5.83
Black, Non-Hispanic	-5.36	-4.27
Hispanic	-2.66	-3.29
Asian or Pacific Islander, Non-Hispanic	-1.67	-6.71
Native American, Non-Hispanic	7.79	-1.38
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

City of Gainesville

The contrast in values between the highest value racial/ethnic group (Whites with 55.52) and the lowest (African Americans with 34.79) is stark. It is readily apparent from this table that African Americans are far more likely to face exposure to high poverty neighborhoods than any other racial/ethnic group. For the other racial/ethnic groups, there is relative parity, particularly between Whites, Hispanics (54.45) and Asians/Pacific Islanders (53.92).

With the exception of Native Americans, differences in index values for the population above and below the poverty line are to be expected. For the Native American population, there is no readily available explanation for the unexpected difference in values, though it may be due to the low population count within the City. Of note is the narrow difference for the Asian/Pacific Islander population (-1.67) – it is possible this is due to selective residential decision-making, with Asians/Pacific Islanders choosing to live in cultural enclaves in the City’s Southern neighborhoods.

Alachua County- Gainesville CBSA

The same trend seen in the City is mirrored in Alachua County. African Americans (34.35) face high exposure to poverty, while Asians/Pacific Islanders (58.65), Hispanics (52.16), and Whites (52.09) enjoy lower exposure to high poverty neighborhoods. Native Americans have the second most exposure to high poverty neighborhoods (43.22), a similar trend as seen in the City.

In the County, there are negative difference values for all racial/ethnic categories, indicating the population above the federal poverty line has less exposure to high poverty neighborhoods. The greatest difference is for Asians/Pacific Islanders (-6.71) followed by Whites (-5.83), indicating these populations are able to locate in communities with less poverty exposure given appropriate resources. Native Americans in the County have the smallest value difference (-1.38), suggesting this population is the least likely to locate in low poverty communities, even with incomes above the FPL.

ii. *For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.*

In addition to table data for exposure to high poverty neighborhoods, HUD offers maps with the same data layered with demographic variables for race/ethnicity, national origin, and familial status. Mapping of this kind offers a prime opportunity to examine residential living patterns in the City of Gainesville and in Alachua County.

The map data shows low poverty exposure communities to the Northwest and West of the City, and low poverty exposure in the City's central core running North and South. Alternatively, the region's Eastern census tracts, in both the City and the County, have some of the region's lowest value neighborhoods. These communities face the highest exposure to poverty.

Low poverty index values for the region's R/ECAPs are consistently low, although it should be noted that the SW Student Housing Corridor R/ECAP cluster benefits from relatively higher index values.

City of Gainesville

In the City, it is readily apparent that the African American community suffers from high exposure to poverty due to its disproportionate concentration in the City's Eastern census tracts. As discussed previously, these communities have the lowest values on the index in the City. The other racial/ethnic categories benefit from spatial dispersion in the central core, Northwest, and Western tracts across the City. This dispersion results in relative parity in exposure to poverty.

Upon reviewing the data for households by national origin in the City, it becomes apparent that all categories of national origin enjoy access to the City's central core of high value neighborhoods, and in the City's Northwest. In particular, Chinese national origin households enjoy the greatest access to the City's highest index value census tracts. It is difficult to identify any particular national origin groups with disproportionately higher exposure to high poverty neighborhoods.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status relative to the low poverty index in the City.

Alachua County

In the County, the African American population is clustered to the East of Gainesville in high poverty neighborhoods. This fact alone explains the overall African American population's low values seen in the data presented. The other populations are relatively evenly dispersed across the County's

communities, with high concentrations of each racial/ethnic category in the County's suburbs just to the West of the City.

Upon reviewing the data for households by national origin in the City, it is difficult to identify particular groups with disproportionately high exposure to poverty than any other group.

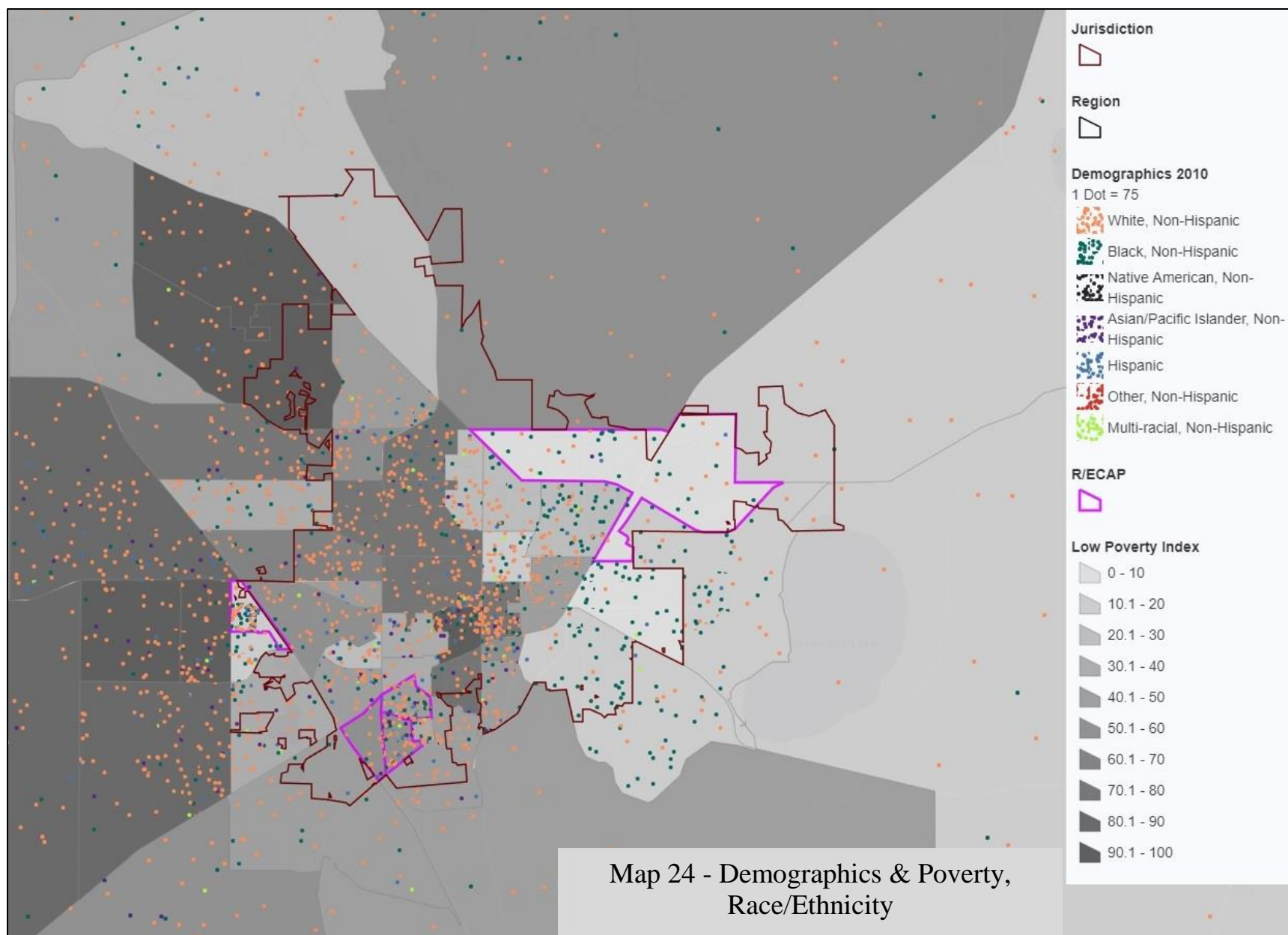
Upon reviewing the data on familial status within the County, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status relative to the low poverty index in the County.

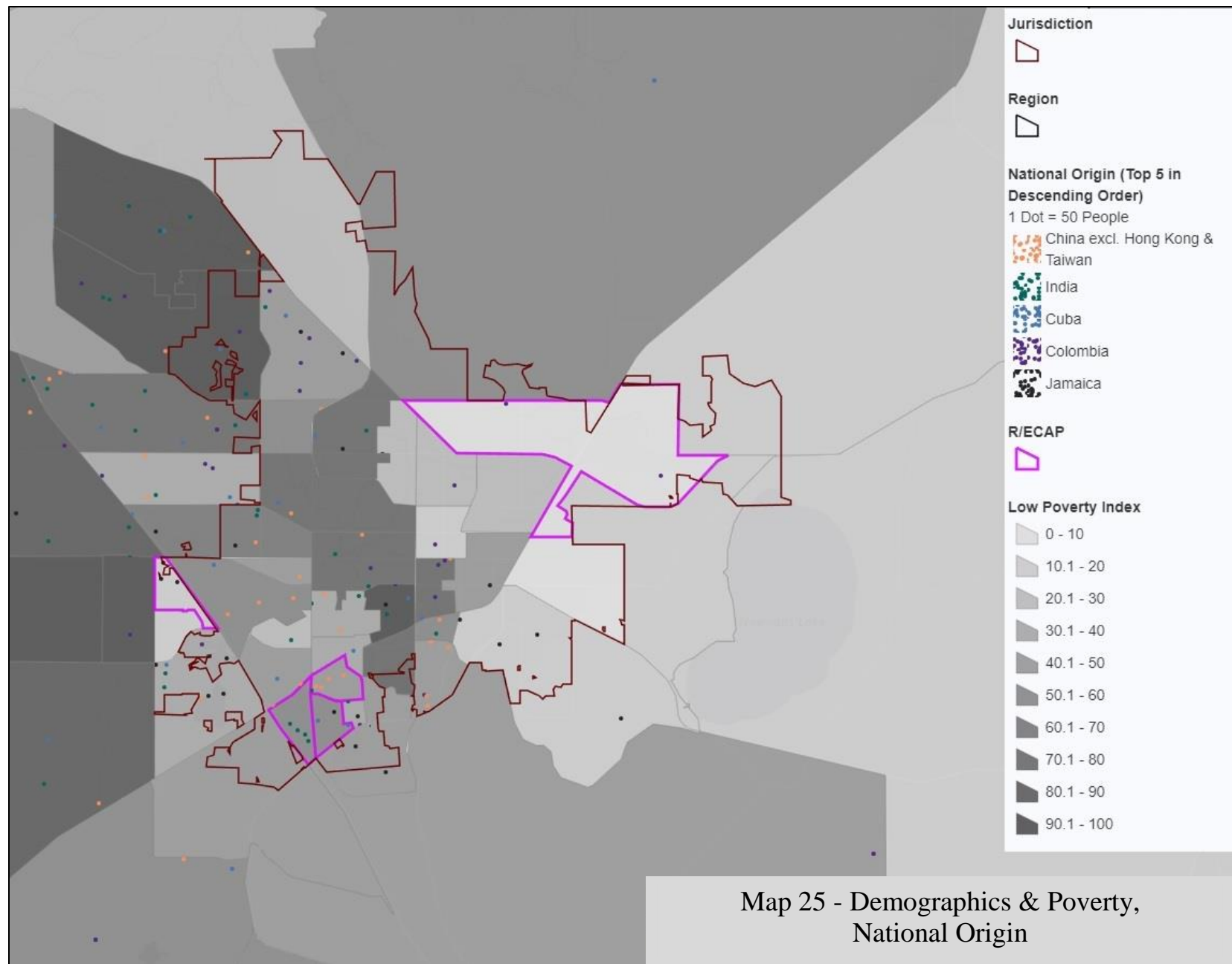
R/ECAPs

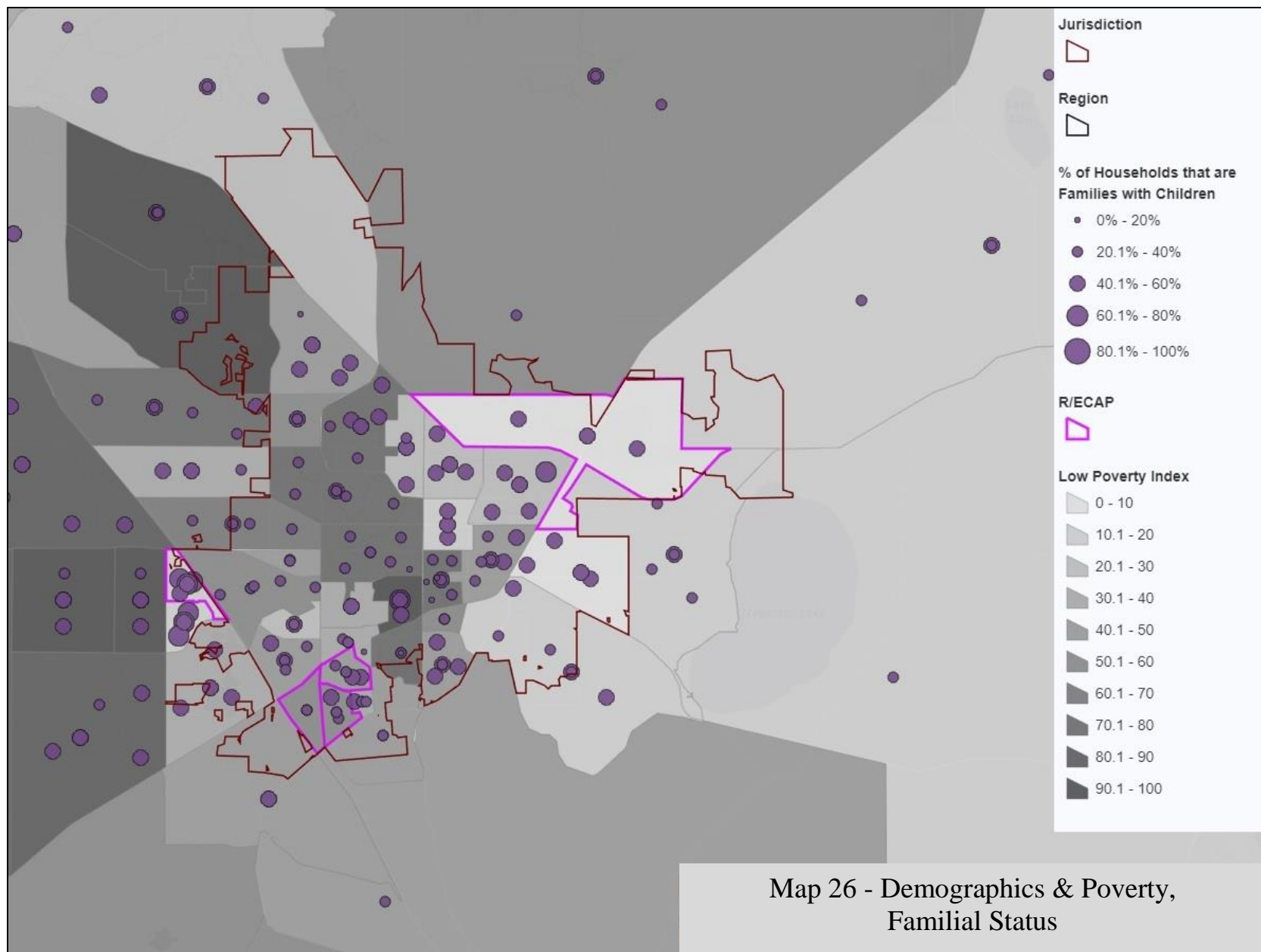
The Tower Rd and Waldo Rd Corridor R/ECAPs have low poverty index values, indicating persons living in those community are exposed to high levels of poverty. Alternatively, the SW Student Housing Corridor has higher index values compared to the other R/ECAPs in the region. As discussed previously, these communities are diverse racially/ethnically, with the Waldo Rd Corridor R/ECAP having the highest concentration of Blacks of the three R/ECAP clusters.

The SW Student Housing Corridor is diverse in terms of national origin, and the Waldo Rd Corridor R/ECAP has very low populations by national origin.

The Waldo Rd. Corridor appears to have higher concentrations of families with children relative to the other R/ECAP areas.







iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

Community consultation revealed a consistent trend: East Gainesville is an area with some of the highest rates of poverty, low opportunity, and other negative characteristics. Residents of East Gainesville, of any protected class, are exposed to consistently higher rates of poverty than residents living in other communities. This unfortunate reality, it appears, is not a result of any particular policy, program, or specific funding mechanism currently in practice. The conditions in East Gainesville are a result of a history of public and private disinvestment for decades, prior to the current iteration of City and regional government.

In terms of policies or programs preventing access to low poverty neighborhoods, access to affordable housing for low income families in low poverty neighborhoods is the principle barrier. While this barrier is primarily due to private market considerations, the City and County have worked hard to encourage affordable housing development through its land use code. The County permits accessory residential units, small housing units built on existing private lots. The City has struggled to adopt similar permissions in its land use code. Doing so would encourage affordable housing in low poverty neighborhoods.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

HUD provides environmental health index data by Census tract for three different protected classes above and below the poverty line. The index is based upon nationally standardized U.S. Environmental Protection Agency (EPA) data on exposure to airborne carcinogenic, respiratory and neurological toxins at the Census block group level (the National Air Toxics Assessments, or NATA). The index ranks tracts from a scale of 0 to 100, with higher values indicating less exposure to harmful toxins, and lower values indicating greater exposure to toxins. The index represents conditions from 2011, the year the most recent data set is drawn. It is important to note that NATA data should be considered with its limitations in mind, including the limited scope of the types of harmful toxins included in the data set. According to the EPA, the index should not be used to identify specific sources of harmful emissions at the neighborhood level, as conditions are subject to variation across census tracts.

Table 16 Environmental Health Index		
Race/Ethnicity	City of Gainesville	Alachua County – Gainesville CBSA
White, Non-Hispanic	25.17	37.72
Black, Non-Hispanic	28.89	32.95
Hispanic	22.77	33.14
Asian or Pacific Islander, Non-Hispanic	22.90	32.58
Native American, Non-Hispanic	26.33	38.30

Population below federal poverty line		
White, Non-Hispanic	21.82	31.14
Black, Non-Hispanic	29.02	31.63
Hispanic	22.74	31.74
Asian or Pacific Islander, Non-Hispanic	22.12	21.35
Native American, Non-Hispanic	22.30	19.23
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>		
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

In addition, HUD provides the same data and distinguishes between the population above the poverty line and below the federal poverty line. This enables an analysis of the degree to which income dictates access to relatively environmentally healthy neighborhoods. Negative values indicate the population above the federal poverty level has lower exposure to harmful toxins. Conversely, positive values indicate the population above the federal poverty level is more likely to be exposed to harmful toxins.

Table 17 Difference in Environmental Health Index Values Between Poverty and Non-Poverty Race/Ethnic Populations		
Racial/Ethnic Category	City of Gainesville	Alachua County – Gainesville CBSA
White, Non-Hispanic	-3.35	-6.58
Black, Non-Hispanic	0.13	-1.32
Hispanic	-0.03	-1.40
Asian or Pacific Islander, Non-Hispanic	-0.78	-11.23
Native American, Non-Hispanic	-4.03	-19.07
<i>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</i>		
<i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

City of Gainesville

African Americans enjoy the lowest exposure to harmful toxins in the City (28.89) compared to Hispanics (22.77) with the lowest values on the index. The difference between the highest value and the lowest is only 6.12, indicating all racial/ethnic categories of person are exposed to relatively high levels of harmful toxins.

With the exception of African Americans, all values are negative, indicating poverty status has a negative impact on a family's ability to live in a healthy environment. In particular, Native Americans (-4.03) and Whites (-3.35) are the most impacted by poverty status. It is important to note that thin margins for the remaining racial/ethnic groups indicates these populations are only slightly impacted by poverty status.

Alachua County – Gainesville CBSA

In the County, Native Americans enjoy the lowest exposure to harmful toxins (38.30), and Asians/Pacific Islanders have the greatest exposure to harmful toxins (32.58). The difference between the highest and lowest values on the index is only 5.72, indicating there is relatively little difference in spatial living patterns and exposure to environmental hazards based on race/ethnicity.

In the County, one can see large differences in access to environmentally healthy neighborhoods based on poverty status for Native Americans (-19.07), Asians/Pacific Islanders (-11.23) and Whites (-6.58), indicating these populations are particularly impacted by poverty status in ability to access environmentally health neighborhoods. For African Americans (-1.32) and Hispanics (-1.40), the difference is only marginal. This result suggests that these populations are not as neighborhood-selective as the other populations, depending on income.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

In addition to strict index values by jurisdiction, HUD also provides the same index values using mapping. This data facilitates a general conversation regarding areas in each jurisdiction with the greatest access to environmentally health neighborhoods, relative to racial/ethnic, national origin, and familial status concentrations. Darker shaded areas are census tracts with higher values on the index, and lighter shaded areas are tracts with lower values on the index.

In general, one notes that areas in the County enjoy lower exposure rates to harmful toxins than do census tracts inside the City. Census tracts in the City's southern region, including those for student housing and R/ECAPs have high exposures to harmful toxins. Neighborhoods in the City's Eastern end have relatively higher values on the index. In the County, census tracts furthest from the City have values consistently higher on the index. It should be noted that the index reports null values for a band of tracts running to the North and South of the City's border, including areas in Micanopy and Waldo. It is not apparent why these tracts do not have data.

The analysis below includes a discussion of residential living patterns by race/ethnicity, national origin, and familial status in the City, Alachua County – Gainesville CBSA, and R/ECAPs.

City of Gainesville

In terms of the environmental health index, the African American population appears to benefit from its concentration in East Gainesville. Asians/Pacific Islanders and Hispanics, with concentrations in the City's southern neighborhoods, appear to have generally lower access to environmentally healthy neighborhoods. The other racial/ethnic populations are dispersed throughout the City, making for the even distribution in index values as seen in the table values discussed previously in this section.

Given the concentration of populations by national origin residing in the City's Southern neighborhoods, there is relative parity for populations by national origin. There are no concentrations of population by national origin in East Gainesville, where census tracts score relatively high on the index.

Upon reviewing the data on familial status within the City, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status relative to the environmental health index in the City.

Alachua County – Gainesville CBSA

Given the lack of data for large census tracts in the County, the spatial patterns by race/ethnicity it is difficult to make solid conclusions based on residential living patterns by race/ethnicity. Indeed, the lack of data for tracts in the County should be seen as the principal cause for significant disparities in index values discussed in the table earlier in this analysis.

There are notable concentrations of Cubans and Mexicans in the County's most rural census tracts – these areas have typically higher values on the environmental health index. Chinese and Filipinos have concentrations in the County's Southwest census tracts, also with a relatively high index value. There does not appear to be significant disparity in access to environmentally healthy neighborhoods by national origin.

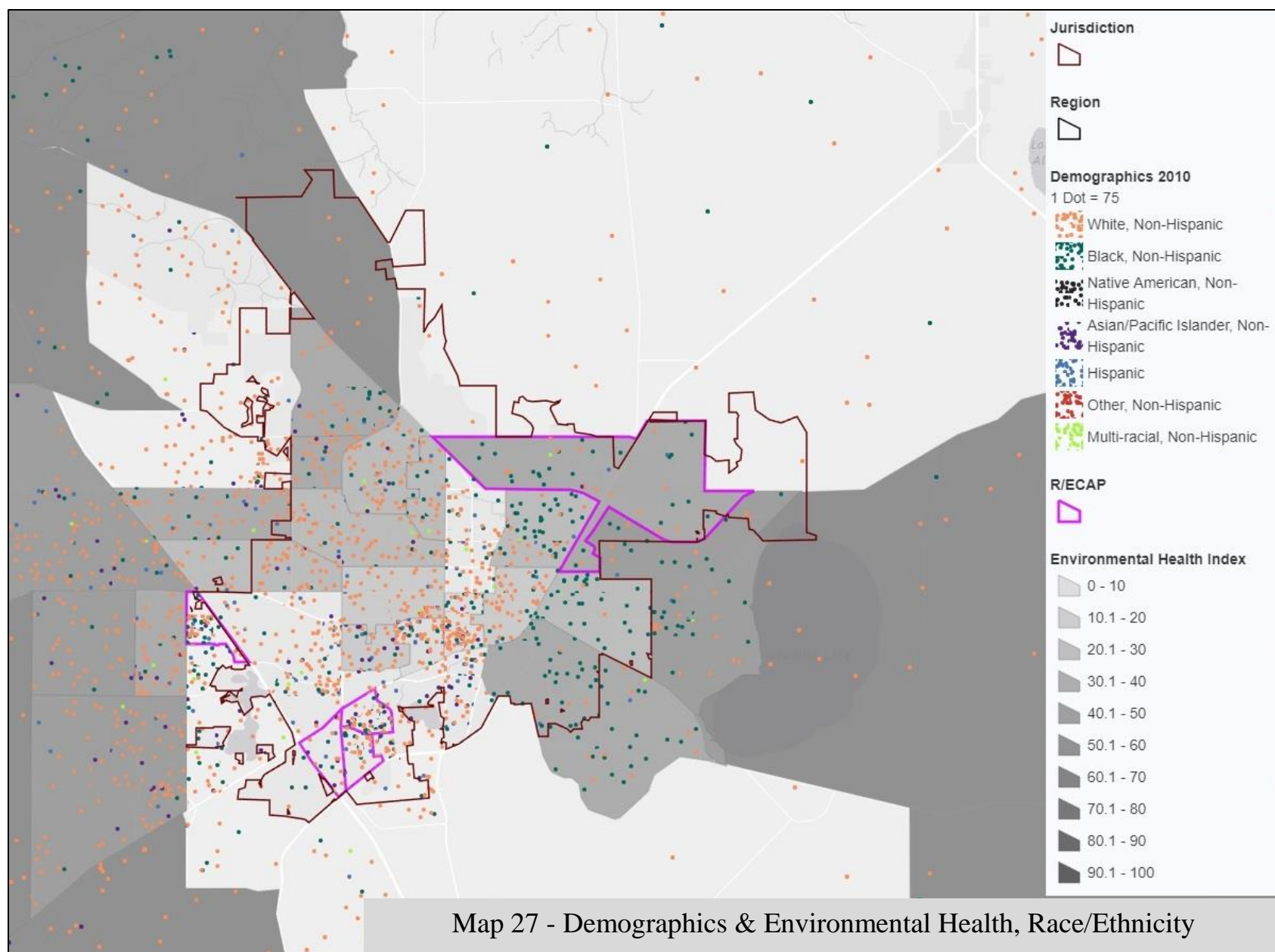
Upon reviewing the data on familial status within the County, and given the lack of data in significant portions of the County, it is difficult to discern notable patterns or concentrations of family households. Thus, it is not possible to make a conclusion regarding any fair housing concern related to familial status relative to the low poverty index in the County.

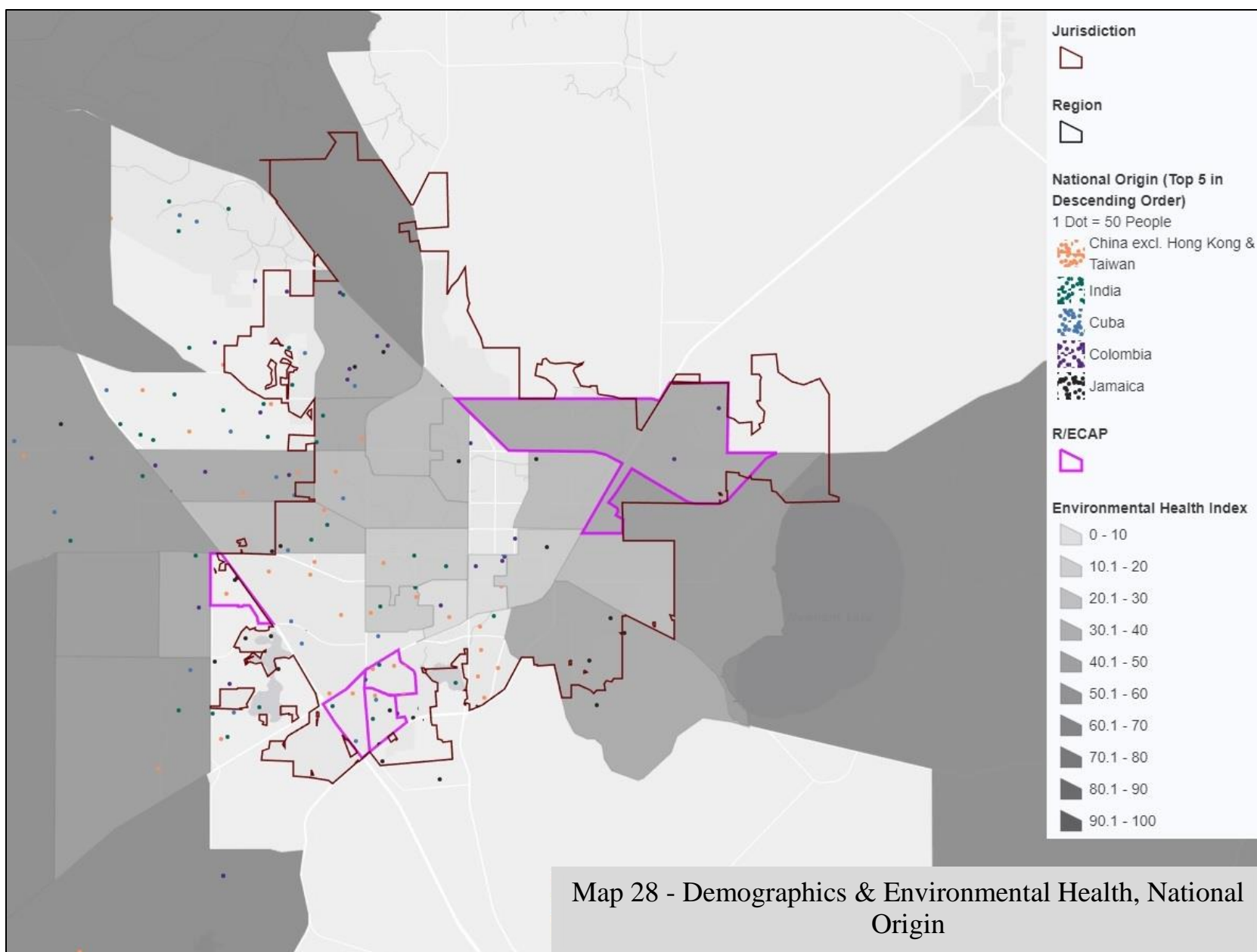
R/ECAPs

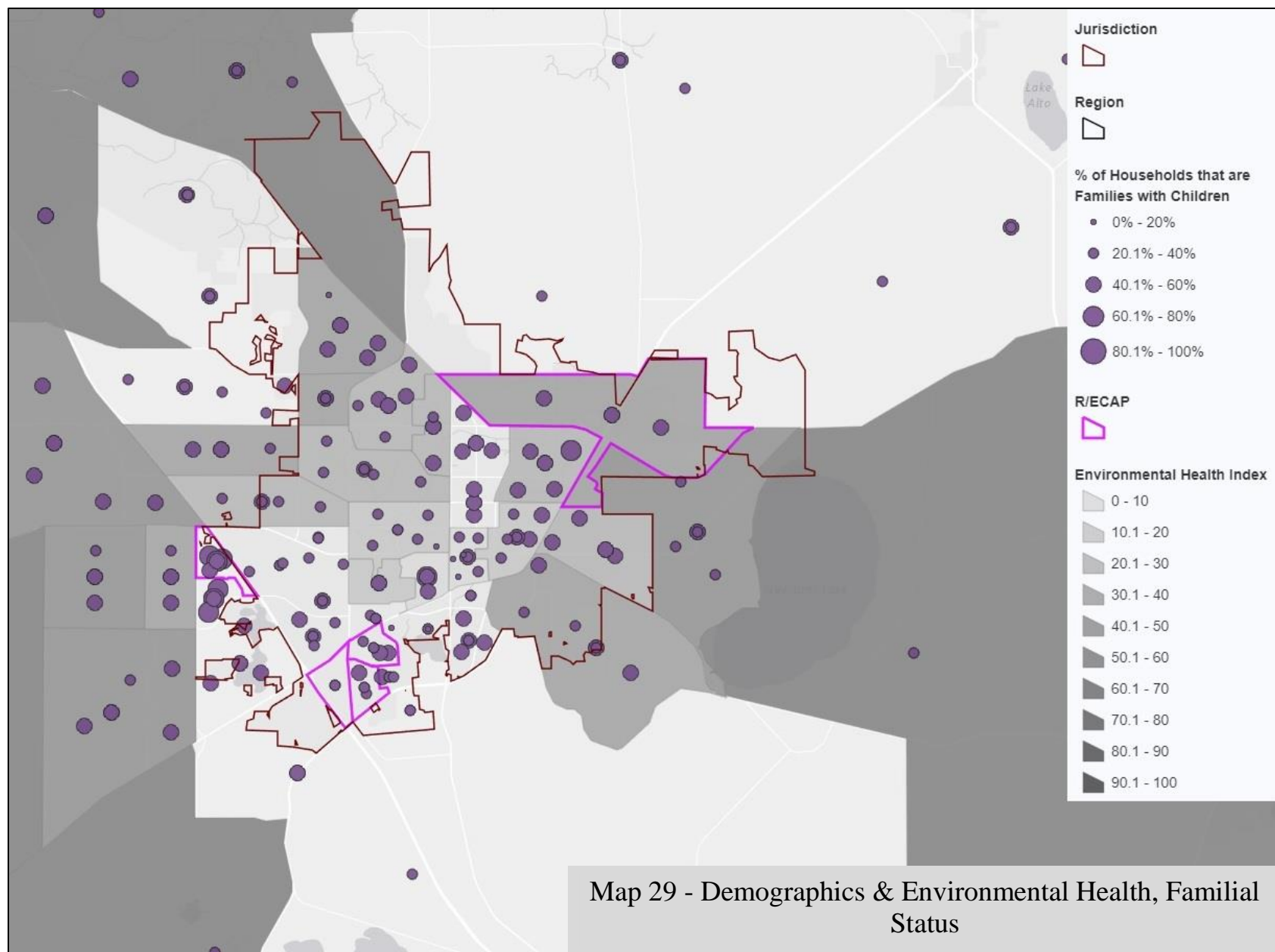
The Tower Rd and SW Student Housing Corridor R/ECAPs have low poverty index values, indicating persons living in those communities are exposed to high levels of environmental pollutants. Alternatively, the Waldo Rd Corridor R/ECAP has higher index values compared to the other R/ECAPs in the region. As discussed previously, these communities are diverse racially/ethnically, with the Waldo Rd Corridor R/ECAP having the highest concentration of Blacks of the three R/ECAP clusters.

The SW Student Housing Corridor is diverse in terms of national origin, and the Waldo Rd Corridor R/ECAP has very low populations by national origin.

As noted previously, the Waldo Rd. Corridor appears to have higher concentrations of families with children relative to the other R/ECAP areas.







- iii. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.*

The community outreach, stakeholder consultation, and government agency consultation did not reveal any specific programs, policies, or funding mechanisms that affect disparities in access to environmentally health neighborhoods in current practice. Consultation did reveal concerns related to the siting of waste collection facilities, a majority of which are located in East Gainesville and communities East of Gainesville in the County.

f. Patterns in Disparities in Access to Opportunity

- i. *For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.*

The analysis included here examined a broad range of considerations around opportunity for the protected classes living in the Gainesville and Alachua County region. From exposure to environmentally unhealthy neighborhoods, the quality of transit access, school proficiency and labor market conditions in neighborhoods across the city, this analysis has identified a consistent pattern of protected classes living in low opportunity neighborhoods, with high exposure to poverty. A summary of significant findings related to each protected class for which HUD provided data is included below:

- Race/Ethnicity: African Americans are disproportionately impacted by poor neighborhood conditions. The burden of poor opportunities for the African American population is due, in large part, to the overall segregation of this community in East Gainesville and County neighborhoods to the East of the City. The census tracts in East Gainesville, including the R/ECAP in the Northeast portion of the City, feature some of the region's lowest index values for exposure to poverty, transportation cost and access, employment, and education. The confluence of these poor conditions for the African American community is cause for concern.

In the County, African Americans are again concentrated in the suburbs to the East of the City, in census tracts with generally lower opportunity index values compared to other regions of the County. Hispanics appear to be dispersed in many of the County's rural communities, which also suffer from low index values, particularly for jobs and transportation. The remaining racial/ethnic groups are relatively evenly dispersed across the County.

- National Origin: areas in the City's southern neighborhoods, including the student housing corridor, there are high concentrations of population by national origin, particularly Chinese. These communities enjoy high index values for the job market and transportation indices, due in large part to the dense built environment.
- Familial Status: this analysis did not identify notable trends in the residential living patterns of families with children, in either the City or the County.

- ii. *Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.*

The following includes a description of areas that experience consistently high access to opportunity and consistently low access to opportunity across multiple indicators.

- **Low Access:** East Gainesville, census tracts East of Gainesville in the County, and in outlying County census tracts, Waldo Rd Corridor R/ECAP.
- **High Access:** Areas in the City's Northwest, West, and Southwest. In the County, census tracts to the West of the City.

2. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

HUD maps and tables provide data for three protected classes: familial status, race/ethnicity, and national origin. The federally protected classes not discussed in this opportunity section include persons by disability, sex, and religion, and local protected classes covered under the Alachua County and Gainesville fair housing ordinances. There is no local data or knowledge available relevant to access to opportunity with respect to religion, sex, or local protected classes. The analysis of access to opportunity for persons with disabilities is discussed in the Disability and Access Analysis section of this document.

- b. *The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).*

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Location of proficient schools and school assignment policies
- Private discrimination
- Access to financial services
- Location and type of affordable housing

- Location of employers
- Loss of affordable housing
- Source of income discrimination

iv. Disproportionate Housing Needs

1. Analysis

- a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?*

The AFFH rule defines disproportionate housing needs as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need”.

Housing need is measured by an analysis of housing problems which consists of cost burden and severe cost burden, overcrowding, and substandard housing. The definition of each housing problem is provided below:

- Cost Burden – Households paying greater than 30% of their total gross income on housing costs.
- Severe Cost Burden – Households paying 50% or more of their total gross income on housing costs.
- Overcrowding – Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded.
- Substandard Housing – Households lacking complete plumbing or kitchen facilities including hot and cold piped water, a flush toilet, a bathtub or shower, a sink with piped water, a range or stove, or a refrigerator.

Table 18 Demographics of Households with Disproportionate Housing Needs						
Disproportionate Housing Needs	City of Gainesville			Alachua County – Gainesville CBSA		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	12,105	29,530	40.99%	24,353	70,878	34.36%

Black, Non-Hispanic	5,140	9,615	53.46%	9,032	17,324	52.14%
Hispanic	2,580	4,690	55.01%	4,057	7,665	52.93%
Asian or Pacific Islander, Non-Hispanic	1,325	3,055	43.37%	1,999	4,784	41.79%
Native American, Non-Hispanic	49	71	69.01%	104	265	39.25%
Other, Non-Hispanic	359	714	50.28%	588	1,374	42.79%
Total	21,570	47,695	45.22%	40,140	102,280	39.25%
Household Type and Size						
Family households, <5 people	5,720	18,109	31.59%	14,670	50,535	29.03%
Family households, 5+ people	630	1,380	45.65%	2,495	5,255	47.48%
Non-family households	15,220	28,200	53.97%	22,965	46,489	49.40%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	7,370	29,530	24.96%	13,485	70,878	19.03%
Black, Non-Hispanic	3,010	9,615	31.31%	5,268	17,324	30.41%
Hispanic	1,885	4,690	40.19%	2,652	7,665	34.60%
Asian or Pacific Islander, Non-Hispanic	855	3,055	27.99%	1,160	4,784	24.25%
Native American, Non-Hispanic	24	71	33.80%	40	265	15.09%
Other, Non-Hispanic	240	714	33.61%	354	1,374	25.76%
Total	13,380	47,695	28.05%	22,965	102,280	22.45%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 19 Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden	City of Gainesville			Alachua County – Gainesville CBSA		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	6,980	29,530	23.64%	12,365	70,878	17.45%
Black, Non-Hispanic	2,755	9,615	28.65%	4,805	17,324	27.74%
Hispanic	1,785	4,690	38.06%	2,414	7,665	31.49%
Asian or Pacific Islander, Non-Hispanic	685	3,055	22.42%	955	4,784	19.96%
Native American, Non-Hispanic	25	71	35.21%	40	265	15.09%
Other, Non-Hispanic	230	714	32.21%	334	1,374	24.31%
<i>Total</i>	<i>12,460</i>	<i>47,695</i>	<i>26.12%</i>	<i>20,913</i>	<i>102,280</i>	<i>20.45%</i>
Household Type and Size						
Family households, <5 people	2,535	18,109	14.00%	6,448	50,535	12.76%
Family households, 5+ people	224	1,380	16.23%	754	5,255	14.35%
Non-family households	9,709	28,200	34.43%	13,736	46,489	29.55%
<i>Note 1: Severe housing cost burden is defined as greater than 50% of income.</i> <i>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</i> <i>Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.</i> <i>Note 4: Data Sources: CHAS</i> <i>Note 5: Refer to the Data Documentation for details (www.hudexchange.info).</i>						

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Table 18 shows the number and percentage of households that are experiencing any of the housing problems or any of the severe housing problems and Table 19 provides data for households experiencing severe housing burdens. According to the data in Table 18, the protected class groups experiencing higher rate of housing problems in the City are Hispanic households (55.01%) and African American households (53.46%). Both these racial/ethnic groups experience housing problems at close to 10 percentage points more than the City as a whole which experiences housing problems at a rate of 45.22%. Non-family households are experiencing a higher rate of housing problems when compared to small (<5 people) and large (5+ people) family households. Approximately 54.00% of non-family households are experiencing any of the 4 housing problems while 31.59% and 46.65% of small family

households and large family households are experiencing any of the 4 housing problems, respectively. In regards to severe housing problems, Hispanic households experience housing problems more frequently than the overall population as a whole and more than another sub-group at 40.19% compared to 28.05% for all households. Usually the most common of the severe housing problems is severe cost burden and according to the data in Table 19 this is true for Gainesville. Over 93.00% of the households that are experiencing severe housing problems are dealing with severe cost burden. Hispanic households experience severe cost burden at a rate of 38.06%, the highest rate for any sub-group and non-family households experience severe housing cost burden at a rate of 34.3% compared to 14.00% and 16.23% for small and large family households, respectively.

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The same racial/ethnic groups and household types experiencing housing problems and severe housing problems in Gainesville have the greatest housing needs in the region. Approximately 40.00% of the total households in the region are experiencing at least one housing problem and Hispanic households experience housing problems at a rate of 52.93% followed closely by African Americans at 52.14%. Conversely, White households experience the lowest rate of housing problems for the overall population as a whole and as well as among each racial/ethnic sub-group. Non-family households experience at least one housing problem at a rate of 49.4% and large family households in the region are also experiencing a higher rate of housing problems, 47.48%, than small family households who experience housing problems at a rate of 29.03%. The race/ethnic groups in the region experiencing higher rates of severe housing problems are Hispanic households at 34.60%, followed by African American households at 30.41%. The percentage of Hispanic and African American households with severe housing problems is between 8 and 12 percentage points more than the region as a whole. Approximately 20.00% of the households in the region experience severe cost burden. The groups experiencing the highest rates of severe cost burden are Hispanic households at 31.49% and non-family households at 29.55%.

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

City of Gainesville

Map 30 and 31 shows the residential living patterns for persons by race/ethnicity and national origin, overlaid on shading that indicates the percentage of households experiencing one or more housing problems. Darker shading on the map indicates a higher prevalence of housing problems.

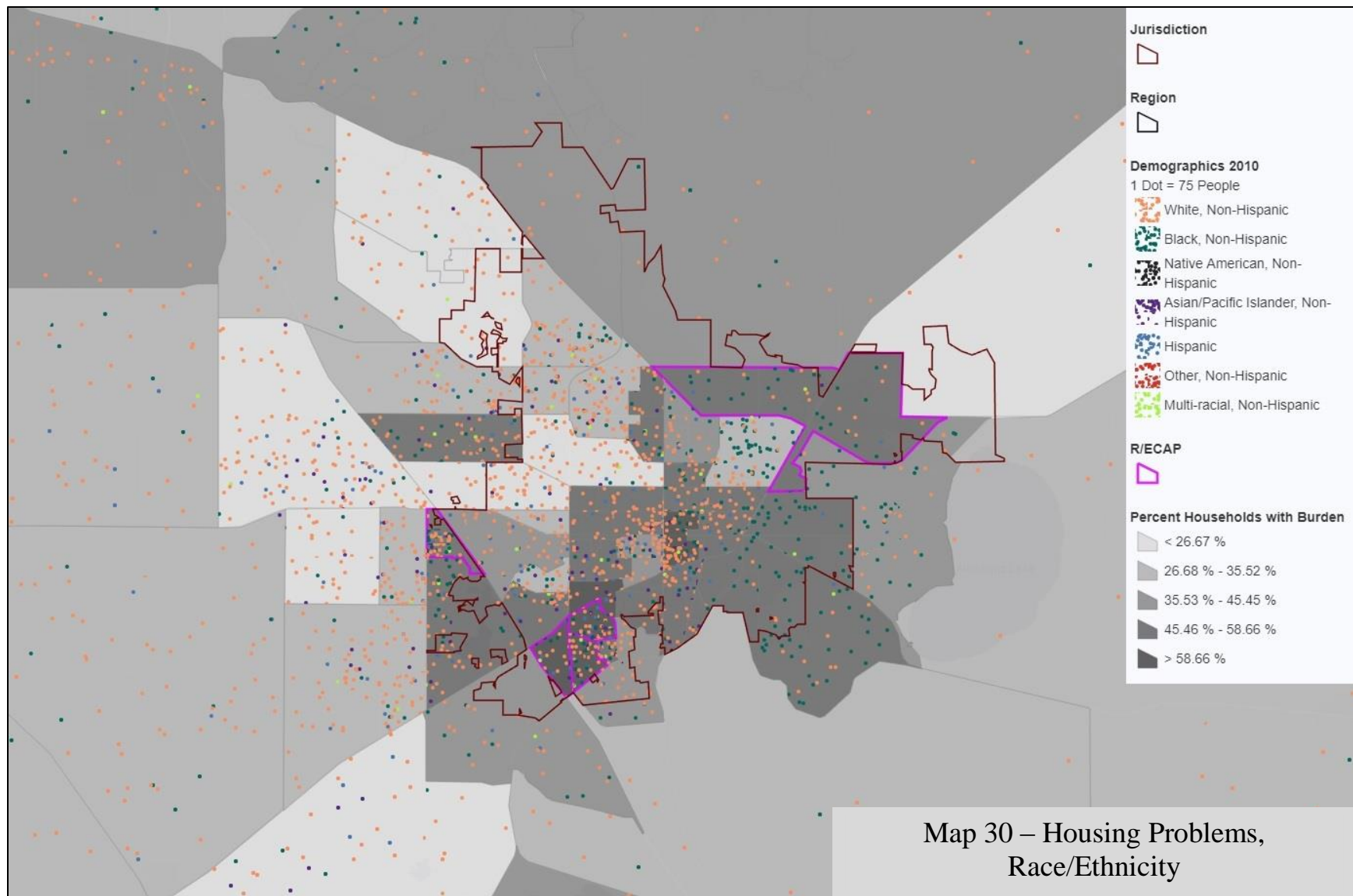
The areas with the greatest housing burdens are East Gainesville, a segregated area, and the southern part of the City which is a more integrated area. The areas with the highest rates of housing burden include the Waldo Road Corridor, SW Student Housing Corridor, and East Gainesville R/ECAPs. The minority group predominantly represented in the R/ECAP areas are African Americans and the predominant country of origin is China. The foreign-born population primarily resides in the southern part of the City in the census tracts surrounding UF.

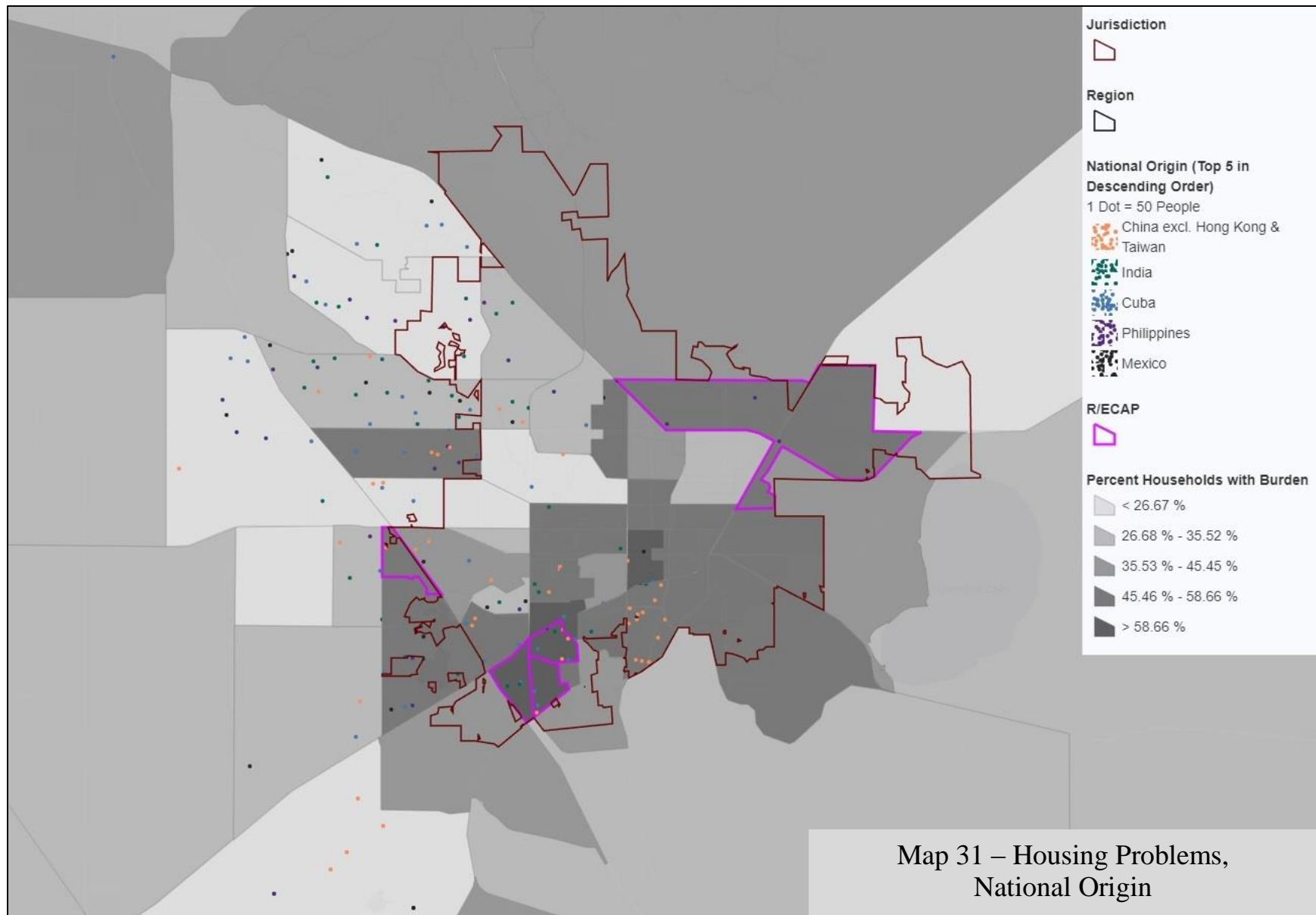
There are also some areas of the City that are occupied by predominantly White populations or more integrated areas that also have high rates of housing burden. These areas include census tract 12.03 which is near the Waldo Road Corridor R/ECAP and includes the neighborhoods of Rainbow's End, Hazel Heights, and Ridgeview; census tract 2.00, which is west of downtown Gainesville and includes the Fifth Avenue neighborhood; and census tracts 9.01 and 10.00 which surrounds UF and is comprised of the University Park, Hibiscus Park, Black Acres, Ridgewood, Raintree, Mason Manor, University Village, and Golfview neighborhoods.

Alachua County – Gainesville CBSA

The areas in the region experiencing the greatest housing burdens are areas in Alachua County that adjoin Gainesville's boundaries. These areas include the Tower Rd./I-75 Corridor R/ECAP as well as the census tracts to the south of the R/ECAP (census tracts 22.18 and 22.19) which is a relatively integrated area, and census tract 7.00 which adjoins the south border of the East Gainesville R/ECAP, a segregated area with a predominantly African American population. Census tract 17.01, which includes the Santa Fe Community College is also experiencing high housing burdens.

Other areas in Alachua County with relatively high housing burdens include High Springs, Alachua, La Crosse, Micanopy and the unincorporated areas of the County that surround these municipalities. The SE quadrant of Gilchrist County, east of Trenton, is also experiencing high housing burdens. These areas are all occupied by predominantly White populations and include a very small foreign-born population from India and Cuba residing near High Springs and Alachua.





- c. *Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.*

According to the data in Table 18, there are 630 families with children experiencing a housing problem (the number of large families with housing problems is used to approximate the population of families with children with housing needs).

The data in Table 20 shows that there are 2,636 publicly supported housing units of which 1,734 are units with 2 or more bedrooms. Over 47.00% (1,249) of households currently residing in publicly supported housing are households with children.

Table 20 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children								
	City of Gainesville							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	230	37.52%	145	23.65%	235	38.34%	324	52.85%
Project-Based Section 8	336	48.07%	162	23.18%	185	26.47%	317	45.35%
Other Multifamily	19	82.61%	3	13.04%	0	0.00%	3	13.04%
HCV Program	317	23.38%	570	42.04%	434	32.01%	605	44.62%
<i>Note 1: Data Sources: APSH</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>								

The breakout of the number of housing units by size in each housing type is as follows:

- Public housing - 360 units with 2 or more bedrooms and 324 are currently occupied by households with children.
- Project-based Section 8 - 347 units with 2 or more bedrooms and 317 are occupied by households with children.
- Other multifamily - there are 3 housing units with 2 bedrooms and all three units are occupied by households with children.
- HCV program - 1,004 units with 2 or more bedrooms and 605 units are occupied by households with children.

d. *Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.*

Throughout the region, there is a total of 74,995 owner households and 74,980 rental households, a fairly even split between homeowners and renters. Further analysis of homeowners versus renters, by jurisdiction and region, is provided in Table 21.

Table 21								
Homeownership and Rental Rates by Race/Ethnicity								
	City of Gainesville				Alachua County – Gainesville CBSA			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	12,935	71.76 %	16,610	55.98 %	44,755	78.56 %	26,120	57.65 %
Black, Non-Hispanic	2,930	16.26 %	6,680	22.51 %	6,795	11.93 %	10,530	23.24 %
Hispanic	1,030	5.71%	3,655	12.32 %	2,580	4.53%	5,080	11.21 %
Asian or Pacific Islander, Non-Hispanic	905	5.02%	2,160	7.28%	2,009	3.53%	2,775	6.12%
Native American, Non-Hispanic	30	0.17%	50	0.17%	205	0.36%	59	0.13%
Other, Non-Hispanic	205	1.14%	510	1.72%	630	1.11%	745	1.64%
Total Household Units	18,025	-	29,670	-	56,970	-	45,310	-
<i>Note 1: Data presented are numbers of households, not individuals.</i>								
<i>Note 2: Data Sources: CHAS</i>								
<i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i>								

City of Gainesville

According to the data in the table, there are 47,695 occupied housing units and 37.79% are owner-occupied while 62.21% are renter-occupied. Gainesville is a predominantly White jurisdiction and White households have higher homeownership and rental rates than any other racial/ethnic sub-group. The percentage of White homeowners is 34 percentage points more than the homeownership rate in the overall jurisdiction which indicates that White households become homeowners at a disproportionately greater rate than other groups. African Americans make up 22.39% of the population but own at a rate of 16.26%. The percentage of African Americans renting housing is more proportionate to the population size at 22.51%. Hispanic households own housing at a rate of 5.71% and rent at a rate of 12.32%. Asian or Pacific Islanders, Native Americans, and Other households have the lowest homeownership rates in the jurisdiction at 5.02%, 0.17% and 1.14%, respectively. However, these groups represent a small proportion of the jurisdiction's population and both the homeownership and rental rates are comparative to the size of the population.

Alachua County – Gainesville CBSA

The overall homeownership rate in the region is higher than the jurisdiction at 54.87% compared to 37.79% in Gainesville. The overall rental rate in the region is 45.13%. Similar to Gainesville, White households own housing at a greater rate than any other group and when compared to the overall homeownership rate in the region, White households own housing at a disproportionately greater rate. There are more White homeowners than there are White renters and conversely, non-white households rent at a higher rate than those who own homes.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

There is no local data or knowledge available relevant to disproportionate housing needs with respect to religion, sex, pregnancy, or national origin. The housing needs of persons with disabilities is discussed in the Disability and Access Analysis section of this document.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

According to 2009-2013 CHAS data, there are 26,405 low- and moderate-income (0-80% AMI) households in Gainesville including 5,910 small family households, 560 large family households, 3,645 elderly households (households contains persons 62 years of age and older), and 2,410 households with one or more children 6 years old or younger.

Table 22 Total Households					
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	11,825	6,190	8,390	3,930	17,370
Small Family Households	2,135	1,155	2,620	1,315	7,620
Large Family Households	170	215	175	110	500
Household contains at least one person 62-74 years of age	550	690	965	435	3,000
Household contains at least one person age 75 or older	375	560	505	335	1,680
Households with one or more children 6 years old or younger	925	490	995	555	1,180
<i>Note 1: Data Sources: CHAS</i>					

There are 21,050 renter-occupied housing units and 5,345 owner-occupied housing units in the City and 17,920 renter-occupied households experience housing problems compared to 3,670 owner-occupied households. Extremely low income (0-30% AMI) households experience housing problems at a higher

rate than low (30-50% AMI) and moderate income (50-80% AMI) households. The most common housing problem experienced by both renters and owners is severe cost burden.

Table 23
Housing Problems (Households with one of the listed needs)

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Substandard Housing - Lacking complete plumbing or kitchen facilities	155	110	25	290	45	80	10	135
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	135	90	55	280	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	15	100	50	165	15	45	0	60
Housing cost burden greater than 50% of income (and none of the above problems)	6,360	2,580	645	9,585	1,060	530	495	2,085
Housing cost burden greater than 30% of income (and none of the above problems)	520	1,395	3,160	5,075	105	275	705	1,085
Zero/negative Income (and none of the above problems)	2,525	0	0	2,525	305	0	0	305
<i>Note 1: Data Sources: CHAS</i>								

In regards to cost burden, Table 24 shows that there are 15,299 renter households and 3,299 owner households that are experiencing cost burden (>30%). This includes 9,920 renter households and 2,160 owner households that are experiencing severe cost burden (>50%), as shown in Table 25. Other households (non-family households), experience a higher rate of cost burden and severe cost burden than small related, large related, and elderly households.

Table 24 Cost Burden > 30%								
	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,075	760	1,075	2,910	290	175	515	980
Large Related	95	65	70	230	50	105	65	220
Elderly	334	380	310	1,024	360	469	305	1,134
Other	5,620	3,050	2,395	11,065	500	150	315	965
Total need by income	7,124	4,255	3,850	15,229	1,200	899	1,200	3,299

Table 25 Cost Burden > 50%								
	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	855	355	200	1,410	290	100	170	560
Large Related	95	15	0	110	40	35	35	110
Elderly	285	255	85	625	280	340	105	725
Other	5,330	2,085	360	7,775	485	95	185	765
Total need by income	6,565	2,710	645	9,920	1,095	570	495	2,160
Note 1: Data Sources: CHAS								

Overcrowding is experienced by 523 renter households and 60 owner households and impacts primarily extremely low income and low income households.

Table 26 Crowding (More than one person per room)										
	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	29	50	54	30	163	0	0	0	0	0
Multiple, unrelated family households	40	35	0	30	105	2	45	0	0	60
Other, non-family households	105	105	45	0	255	0	0	0	0	0
Total need by income	174	190	99	60	523	15	45	0	0	60
Note 1: Data Sources: CHAS										

The waiting lists of public housing authorities are also an indication of housing need in the jurisdiction and region. The ACHA has 1,485 families on its waiting lists – 1,167 on the HCV program waiting list and 318 on the public housing waiting list. At 83.63%, a large majority of the families on the waiting

list are African American. In contrast, only 13.06% of the families on the waiting list are White. In terms of family composition, 64.92% are families, 21.28% are headed by a person with a disability, 11.19% are single, and 2.80% are elderly. Over 91% of households on the public housing waiting list and 97.51% of households on the HCV program waiting list are extremely low income.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Location of and/or lack of housing support for victims of domestic violence
- Loss of affordable housing
- Source of income discrimination

C. Publicly Supported Housing

1. Analysis

Table 27		
Publicly Supported Housing Units by Program Category		
	City of Gainesville	
Housing Units	#	%
Total housing units	58,404	-
Public Housing	628	1.08%
Project-based Section 8	725	1.24%
Other Multifamily	24	0.04%
HCV Program	1,631	2.79%
<i>Note 1: Data Sources: Decennial Census; APSH</i> <i>Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</i>		

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?*

Across all program categories in the jurisdiction and regionally, African American households represent the dominant racial/ethnic group residing in publicly supported housing with 90.26% residing in public housing, 71.88% Project-Based Section 8 (PBRA), 77.27% residing in other multifamily units, and 72.67% utilizing the Housing Choice Voucher (HCV) program in the jurisdiction and 72.50% using HCV regionally.

Table 28 Publicly Supported Households by Race/Ethnicity								
City of Gainesville	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	47	7.76%	547	90.26%	12	1.98%	0	0.00%
Project-Based Section 8	167	24.85%	483	71.88%	21	3.13%	1	0.15%
Other Multifamily	5	22.73%	17	77.27%	0	0.00%	0	0.00%
HCV Program	317	24.00%	960	72.67%	42	3.18%	0	0.00%
Total Households	29,530	61.91%	9,615	20.16%	4,690	9.83%	3,055	6.41%
0-30% of AMI	5,915	50.04%	2,920	24.70%	1,795	15.19%	910	7.70%
0-50% of AMI	8,865	49.21%	4,435	24.62%	2,480	13.77%	1,250	6.94%
0-80% of AMI	13,380	50.68%	6,735	25.51%	3,365	12.75%	1,770	6.70%
Alachua County – Gainesville CBSA	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	47	7.76%	547	90.26%	12	1.98%	0	0.00%
Project-Based Section 8	167	24.85%	483	71.88%	21	3.13%	1	0.15%
Other Multifamily	5	22.73%	17	77.27%	0	0.00%	0	0.00%
HCV Program	476	23.13%	1,492	72.50%	87	4.23%	1	0.05%
Total Households	70,878	69.30%	17,324	16.94%	7,665	7.49%	4,784	4.68%

0-30% of AMI	10,160	53.47%	4,979	26.21%	2,354	12.39%	1,130	5.95%
0-50% of AMI	15,300	50.91%	7,618	25.35%	3,273	10.89%	1,515	5.04%
0-80% of AMI	25,820	54.93%	11,492	24.45%	4,737	10.08%	2,270	4.83%
<p><i>Note 1: Data Sources: Decennial Census; APSH; CHAS</i></p> <p><i>Note 2: #s presented are numbers of households not individuals.</i></p> <p><i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i></p>								

The percent of African American households represented in publicly supported housing is significantly higher in comparison to other race/ethnicities with white households representing 7.76% for public housing, 24.85% PBRA, 22.73% for other multifamily units, and 24% utilizing the HCV program in the jurisdiction and 23.13% using HCV regionally.

Hispanic households represent approximately 2% of total households residing in publicly supported housing and Asian/Pacific Islander accounts for less than 1% of households in publicly supported housing.

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

Regionally, for each category, the data indicate the same trends documented at the jurisdictional level, with the exception of the HCV program. Although the jurisdiction uses 1,319 vouchers, the region as a whole uses only 2,056 vouchers. The use of the additional vouchers does not change the pattern of race/ethnicities represented in publicly supported housing programs regionally. African American is still the race/ethnicity most likely to reside in publicly supported housing, both jurisdictionally and regionally, followed in order by White, Hispanic, and Asian/Pacific Islander.

iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Race/Ethnicity

In the jurisdiction, for total households in the general population, demographics show that 61.91% are White, 20.16% are African American, 9.83% are Hispanic, and 6.41% are Asian/Pacific Islander. Of total households in the region, 69.30% are White, 16.94% are African American, 7.49% are Hispanic, and 4.68% are Asian/Pacific Islander.

For the jurisdiction's publicly supported housing, White households use 7.76% of public housing units, 24.85% of Project-Based Section 8 units, 22.73% of other multi-family units, and 24% of HCV

Program units. Regionally, White households in publicly supported housing represent the same percentages as for the jurisdiction, with the exception of the HCV Program. White's represent 23.13% of households in the region utilizing the HCV Program.

For the jurisdiction's publicly supported housing, African American households use 90.26% of public housing units, 71.88% of Project-Based Section 8 units, 77.27% of other multi-family units, and 72.67% of HCV Program units. Regionally, African American households in publicly supported housing represent the same percentages as for the jurisdiction, with the exception of the HCV Program. African American's represent 72.50% of households in the region utilizing the HCV Program.

Hispanic households in the jurisdiction's publicly supported housing represent 1.98% of public housing units, 3.13% of Project-Based Section 8 units, and 3.18% utilize the HCV Program. Regionally, Hispanic households in publicly supported housing represent the same percentages as for the jurisdiction, with the exception of the HCV Program. Hispanic's represent 4.23% of households in the region utilizing the HCV Program.

Less than 1% of Asian/Pacific Islander households reside in any category of publicly supported housing in the jurisdiction or regionally.

The high percent of African American households residing in publicly supported housing and significant disproportion in comparison to the population in general, which is much lower, is extremely apparent from the data presented. For White households the percentage residing in all publicly supported housing categories is lower than the total household percentage for the general population. Hispanic and Asian/Pacific Islander households do not have a large representation in either publicly supported housing or the general population.

Families with Children

According to ACS data, of the total number of households in the jurisdiction, 16% are households with own children under the age of 18 (families with children) and of the total households regionally, 22% are households consisting of families with children.

Of the population residing in publicly supported housing, 52.85% are families with children living in public housing, 48.32% are families with children in Project-Based Section 8, 13.04% are family with children in other multi-family units, and 44% are families with children utilizing the HCV program.

The percentages of households consisting of families with children for the general population are much lower in comparison to the percentages of households consisting of families with children for publicly supported housing. In six of the Gainesville Housing Authority's public housing developments 72% of the units are occupied by households with children. Public housing developments housing families with children include Caroline Manor, Eastwood Meadows, Forest Pines, Lake Terrace, Pine Meadows, and Woodland Park. In addition, many PBRA units also house families with children.

Elderly

Of general population households in the jurisdiction, 23.5% are households with one or more person 60 years or over and regionally, 31.2% of total households contain one or more person 60 years and over.

Of publicly supported housing, 18.43% of public housing units are elderly households, 27% of Project-Based Section 8 are elderly households, 16% are elderly households utilizing the HCV Program, and there are no reported elderly households in other multi-family housing units.

With the exception of the PBRA category, the percentages of elderly households for the general population are higher than that of elderly households residing in publicly supported housing.

Persons with Disability

The total number of persons with disabilities in the jurisdiction is 18.21% and 22.98% for the region. Persons with disabilities residing in publicly supported housing in the jurisdiction represent 26.59% of public housing units, 21.60% of Project-Based Section 8 units, 82.61% of other multi-family units, and 24.63% of HCV Program units. Regionally, persons with disabilities residing in publicly supported housing represent the same percentages as for the jurisdiction, with the exception of the HCV Program. Persons with disabilities represent 22.77% of persons in the region utilizing the HCV Program.

Low to Moderate Income (LMI)

African Americans in publicly supported housing have lower incomes than any other race/ethnicity in assisted housing within the jurisdiction. Data shows that 14% of African American households in publicly supported housing are LMI compared to 2% for Whites and less than 1% for both Hispanic and Asian/Pacific Islander. African American's represent the largest population in publicly supported housing which is a clear indicator for why this race/ethnicity also has the lowest incomes.

The trend is the same regionally, with 11% African Americans in publicly supported housing being LMI compared to 1.5% Whites, 1% Hispanics, and less than 1% Asian/Pacific Islander. Again, even regionally, African Americans represent the largest population in publicly supported housing providing the indicator for these results.

b. Publicly Supported Housing Location and Occupancy

- i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.*

The Gainesville Housing Authority primarily serves the jurisdiction, with all of their public housing units located within Gainesville city limits. The Alachua County Housing Authority serves both the jurisdiction and the region. All of ACHA's public housing units were located in the county, however due to rezoning or incorporation, now half of the units are located within city limits. Because GHA and ACHA have recognized that it is mutually, economically and administratively beneficial, they have entered into a Memorandum of Understanding allowing both GHA and ACHA to administer Housing

Choice Voucher's in each other's jurisdiction. The ACHA housing choice vouchers are mainly being utilized within city limits at about 80% compared to 20% of the vouchers being used in the county. The ACHA public housing program and voucher program has shifted over the years to serve more city residents based on need. Because suitable employment is mainly located in the Gainesville area and there is a severe lack of accessible transportation in the county, residents and voucher holders prefer to find housing within city limits.

A large percentage of publicly supported housing for the jurisdiction is located in the areas of East Gainesville and Waldo Road Corridor R/ECAP while most publicly supported housing for the county is located in the SW Student Corridor R/ECAP and Tower Rd / I-75 Corridor R/ECAP. Regionally, publicly supported housing is scattered.

Public Housing

The Gainesville Housing Authority manages 635 public housing units within eight developments including Caroline Manor, Eastwood Meadows, Forest Pines, Lake Terrace, Oak Park, Pine Meadows, Sunshine Park, and Woodland Park. All GHA public housing units are located in the East Gainesville target area, which has been identified as an area of great need within the jurisdiction. Public housing is located south of the Waldo Road Corridor R/ECAP and northeast of the SW Student Housing Corridor R/ECAP. Public housing being segregated to East Gainesville decreases access to opportunity for public housing residents, as there is a lack of proficient schools, suitable employment, and transportation in the East Gainesville target area.

The Alachua County Housing Authority manages 276 public housing units at fifteen different properties. Four properties are located within city limits, all of which are in the R/ECAP areas of SW Student Housing Corridor and Waldo Road Corridor. These four properties include Mill Run, Phoenix, Rocky Point, and Pine Forest.

Eleven of ACHA's properties are located in Alachua County and serve residents throughout the region. Cedar Ridge, Linton Oaks, and Tower Oaks are located in the Tower Rd / I-75 Corridor R/ECAP with Dogwood/Pine Glade and Westpoint just south. Greentree is a property located just east of the East Gainesville target area. The remaining five properties are scattered throughout the county including Thistle Hills East and Thistle Hills West located in the City of Archer, Meadowbrook in the City of Newberry, Hitchcock and Merrillwood located in the City of Alachua, and Pine Tree Terrace in the City of Waldo.

Regionally, there are also public housing units in Trenton, FL which is located in Gilchrist County. The location of these public housing units sits at least 30-45 miles west of Alachua County and the City of Gainesville and is not near any of the identified R/ECAPs or segregated target areas for the region.

A large percentage of the African American population is represented where public housing developments are located, specifically in the East Gainesville target area and in the Tower Rd / I-75 Corridor R/ECAP. Public housing located in the SW Student Housing Corridor R/ECAP is represented by a mix of all races.

Project-Based Section 8

The majority of the Project-Based Section 8 apartments in the jurisdiction are located in the East Gainesville target area. There are nine developments within East Gainesville including Housing for the Handicapped Alachua County, Forest Green Apartments, Pine Grove Apartments, Horizon House Apartments, Sunset Apartments, Gardenia Gardens Apartments, The 400 Apartments, and Carver Gardens.

There are three PBRA complexes located directly outside the Waldo Road Corridor R/ECAP, including Alternative Housing Inc. to the west and Housing for the Handicapped Alachua County and Forest Green Apartments to the south.

Three PBRA complexes are located within the SW Student Housing Corridor R/ECAP including New Horizons I –Joyce Apartments, New Horizons II – Sunset Apartments, and New Horizons III – Transitions Apartments. Though this area is designated as a R/ECAP or segregated area, this R/ECAP includes primarily student housing.

Pine Meadows Apartments is located within the Tower Rd / I-75 Corridor R/ECAP and Majestic Oaks Apartments is located just south of the same R/ECAP area.

Hampton Court PBRA is located northwest of the Waldo Road Corridor R/ECAP and in the northwest portion of the city and Alternative Housing Inc. is just west of the Waldo Road Corridor R/ECAP. These two are the only PBRA complexes not located in a R/ECAP or East Gainesville target area.

Regionally, there are two PBRA complexes located in Alachua, FL, Alachua Apartments and Sherwood Oaks Apartments and one PBRA development in Trenton, FL. These PBRA developments are located in northwest Alachua County and in Gilchrist County and not near designated R/ECAPs or segregated areas. These PBRA complexes do not serve Gainesville residents.

Both White and African American race/ethnicities are represented where PBRA developments are located. Project-Based Section 8 units located northwest, directly south of the Waldo Road Corridor R/ECAP, and southeast of Williston Road in East Gainesville are primarily African American. Project-Based Section 8 units located in East Gainesville between NE 23rd Avenue and Archer Road and East of Highway 441 are in areas where Whites are primarily represented. Project-Based Section 8 units located in the SW Student Housing Corridor R/ECAP are represented by a mix of White, African American, Hispanic, and Asian/Pacific Islander. Again, this area is primarily student housing so a representation of all race/ethnicities makes sense.

Regionally, the majority of PBRA units are located in areas represented by White and African American, specifically in the Tower Rd / I-75 Corridor R/ECAP.

Housing Choice Vouchers

Housing Choice Vouchers managed by GHA and ACHA are primarily being utilized with Gainesville city limits. Vouchers are predominantly being used in the East Gainesville target area and Waldo Road Corridor R/ECAP. A lot of the jurisdiction's affordable housing is located in East Gainesville resulting in residents using their vouchers in this segregated area.

There is heavy usage of vouchers just south of the Tower Rd / I-75 Corridor R/ECAP, likely serving Alachua County residents. Vouchers are being utilized in northwest Gainesville, which is less segregated and outside of East Gainesville or R/ECAP areas.

There is not a large percentage of vouchers being used in the SW Student Housing Corridor R/ECAP, but again, this area is primarily student housing and there is not a need for voucher use in this location.

Vouchers are not being utilized much outside of R/ECAP areas or the East Gainesville target area, however, regionally vouchers are being used west of I-75 towards Newberry and some north of High Springs and La Crosse in Alachua County.

In areas with the heaviest usage of housing choice vouchers which is the Waldo Road Corridor R/ECAP and East Gainesville target area, the population represented is African American.

Other Multi-Family

There is one development in the region designated as Other Multi-Family, New Horizons IV – Choice Apartments, located in the East Gainesville target area just south of the Waldo Road Corridor R/ECAP. This area is primarily represented by the White population.

Low Income Housing Tax Credit

Three LIHTC developments are located within R/ECAP areas including two in the Waldo Road Corridor R/ECAP and one in the Tower Rd / I-75 Corridor R/ECAP. There are also four developments located in the East Gainesville target area.

Regionally, there are seven LIHTC developments located within Alachua County and outside of R/ECAP or identified areas of segregation. One development is located in Alachua, FL, two near Santa Fe Community College just east of I-75 between NW 39th Avenue and Newberry Road, two just west of I-75 along Archer Road, one along Newberry Road between Gainesville and Newberry, and one in Archer, FL.

The LIHTC developments located in the Waldo Road Corridor R/ECAP and East Gainesville are in areas represented primarily by African Americans. The LIHTC development located in the Tower Rd / I-75 Corridor R/ECAP is represented by both Whites and African Americans. Regionally, the LIHTC units outside of city limits are in locations represented by Whites and African Americans.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

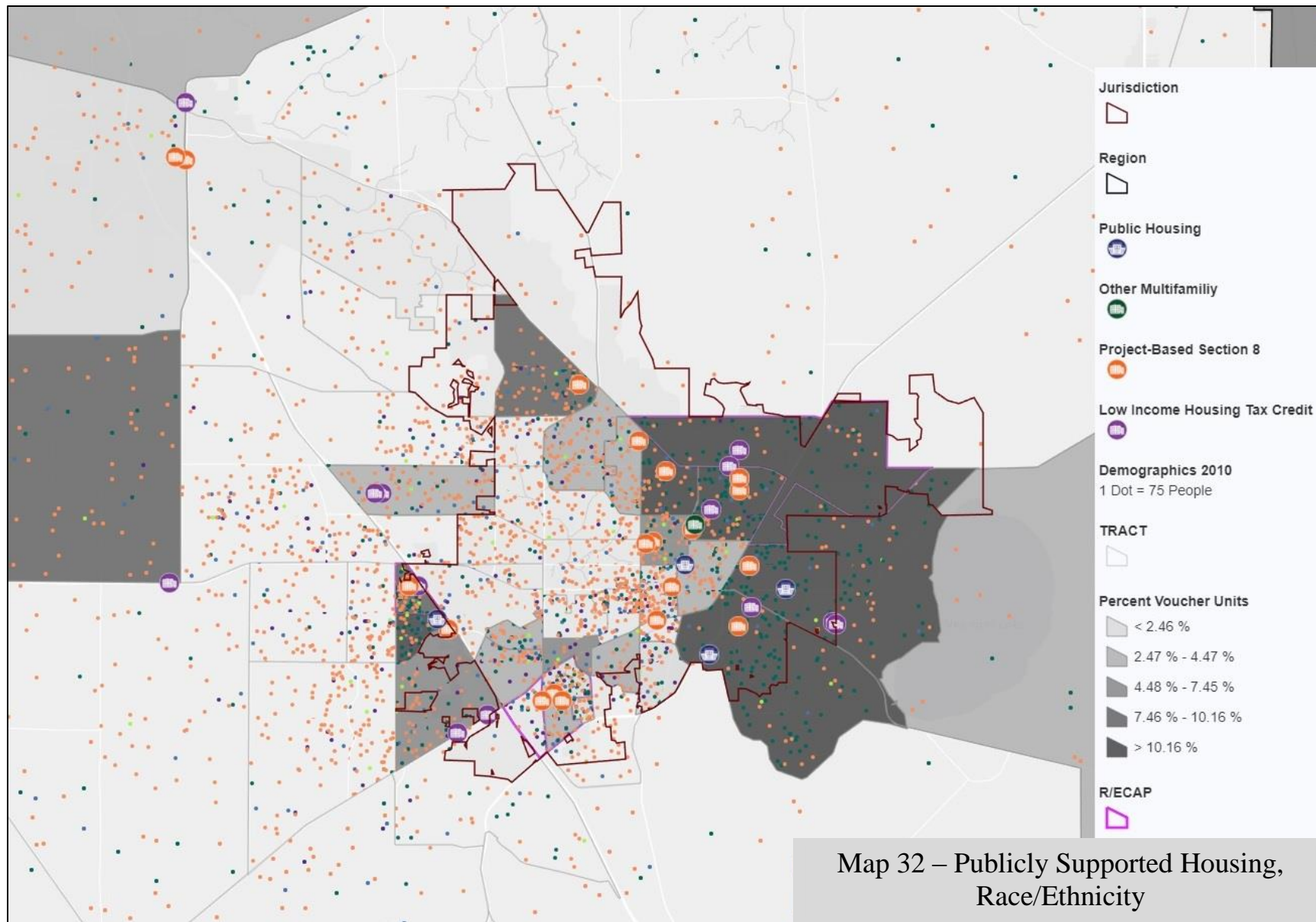
The GHA is seeking to designate 171 low-income public housing units in its Oak Park and Sunshine Park Developments as senior only and apply for an additional 40 vouchers to meet the needs of the disabled. Both Oak Park and Sunshine Park are located in the East Gainesville target area and have a mixed population that is primarily White and African American.

The ACHA does not currently have any publicly supported housing specifically designated for families with children, elderly, or persons with disabilities. The application process for publicly supported

housing is open to the general population, meaning that units may occupy families with children, elderly, or persons with disabilities. Currently ACHA's publicly supported housing units are occupied by 457 families with children, 187 elderly, and 735 persons with disabilities. Because there are no units primarily serving these categories, the geographic location of units occupied by these protected classes would align with the geographic locations detailed in 1(b)(ii) of this analysis.

The ACHA is considering plans to convert its 34 unit public housing at Rocky Point to senior housing. If Rocky Point were to be converted, its location would be in the Phoenix Neighborhood which is located in the SW Student Housing Corridor R/ECAP, populated with a mixture of all race/ethnicities.

Given that there is not publicly supported housing designated primarily for families with children, elderly, and persons with disabilities, there are no additional distinguishing geographical patterns between the location of publicly supported housing serving these protected classes compared to those serving other protected classes.



iii. *How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?*

As identified in 1(b)(i), publicly supported housing in the jurisdiction is either located in a R/ECAP or in the East Gainesville target area. Public housing and other multi-family housing demographic composition for all protected classes including Whites, African American, Hispanic, Asian/Pacific Islanders, families with children, elderly, and persons with disabilities, indicates occupants reside outside of R/ECAP areas. Project - Based Section 8 and HCV data indicates occupants living both within and outside of R/ECAP areas.

Table 29 R/ECAP / Non-R/ECAP Demographics by Publicly Supported Housing Category								
City of Gainesville	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	615	7.76%	90.26%	1.98%	0.00%	52.85%	18.43%	26.59%
Project-based Section 8								
R/ECAP tracts	33	38.24%	58.82%	2.94%	0.00%	0.00%	16.28%	81.40%
Non R/ECAP tracts	652	24.14%	72.57%	3.13%	0.16%	48.32%	28.05%	17.68%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	22	22.73%	77.27%	0.00%	0.00%	13.04%	0.00%	82.61%
HCV Program								
R/ECAP tracts	253	21.54%	74.62%	3.85%	0.00%	39.85%	18.05%	26.32%
Non R/ECAP tracts	996	25.10%	71.63%	3.08%	0.00%	45.23%	15.79%	24.39%
<i>Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.</i> <i>Note 2: Data Sources: APSH</i> <i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i>								

The data presented does not reflect an accurate portrait when comparing occupants in R/ECAPs versus non R/ECAPs. To clarify, all GHA public housing units and other multi-family developments are located in the East Gainesville target area. East Gainesville has been identified as an “area of concentration” for the purpose of this analysis. When considering East Gainesville as a segregated

area, data reveals that occupants of publicly supported housing, across all protected classes and categories, reside within R/ECAP or segregated areas within the jurisdiction.

The same concept is true regionally as ACHA serves both county and city limits. Across all protected classes and categories of publicly supported housing, occupants within city limits are mainly in R/ECAP areas, specifically Tower Rd / I-75 Corridor and SW Student Housing Corridor. For publicly supported housing serving Alachua County and surrounding areas in the region, occupants across all protected classes are outside of R/ECAP areas.

iv. Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

The demographic composition of public housing developments is not significantly different from each other. African American is the race/ethnicity representing the largest percentage of residents in all public housing developments. The ratio of African American residents in each development is much greater than any other race/ethnicity with an average of 88% African American compared to an average of 9% for White, 2% for Hispanic, and less than 1% Asian/Pacific Islander.

Representation for households with children in public housing differs significantly for two developments, Oak Park and Sunshine Park. These developments represent only 2% of units consisting of households with children, while Pine Meadows, Lake Terrace, Forest Pines, Caroline Manor, Woodland Park, and Eastwood Meadows represent 72% of public housing units consisting of households with children.

Table 30								
Demographics of Publicly Supported Housing Developments, by Program Category								
Public Housing								
City of Gainesville								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Pine, Lake, Forest, Caroline	FL063	Gainesville Housing Authority	239	5%	95%	0%	N/a	72%
Woodland Park, Eastwood Meadows	FL063	Gainesville Housing Authority	218	1%	96%	2%	N/a	72%
Oak Park, Sunshine Park	FL063	Gainesville Housing Authority	171	21%	73%	5%	N/a	2%
Project-Based Section 8								
City of Gainesville								

Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Gardenia Gardens Apartments	N/a	N/a	99	5%	91%	4%	N/a	88%
Horizon House Apartments	N/a	N/a	28	14%	82%	5%	N/a	82%
New Horizons Properties Ii - Sunset	N/a	N/a	20	30%	65%	5%	N/a	N/a
Village Green Apartments	N/a	N/a	77	5%	89%	6%	N/a	72%
Pine Grove Apts	N/a	N/a	96	70%	15%	12%	2%	N/a
New Horizons Properties I - Joyce A	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
Sunset Apartments	N/a	N/a	25	15%	85%	0%	N/a	80%
Alternative Housing, Inc.	N/a	N/a	12	92%	8%	0%	N/a	N/a
Forest Green Apartments	N/a	N/a	85	5%	94%	1%	N/a	74%
Hampton Court	N/a	N/a	42	2%	98%	0%	N/a	78%
Housing For The Handi. Of Ala	N/a	N/a	12	58%	42%	0%	N/a	N/a
The 400 Apartments	N/a	N/a	101	48%	47%	3%	1%	N/a
New Horizons Properties Iii - Trans	N/a	N/a	8	53%	47%	0%	N/a	N/a
Carver Gardens	N/a	N/a	100	0%	99%	1%	N/a	62%
Hsg For Handicapped Of Alachua County	N/a	N/a	12	55%	45%	0%	N/a	N/a
Other HUD Multifamily Assisted Housing								
City of Gainesville								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
New Horizons Prop. Iv, Inc.	N/a	N/a	24	26%	74%	0%	N/a	17%
<p><i>Note 1: For LIHTC properties, this information will be supplied by local knowledge.</i></p> <p><i>Note 2: Percentages may not add to 100 due to rounding error.</i></p> <p><i>Note 3: Data Sources: APSH</i></p>								

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

Public Housing

As identified in 1(a)(i), majority of the publicly supported housing occupants are African American for the jurisdiction and region.

All of the public housing developments for the jurisdiction are located in the East Gainesville target area, which according to the Community Redevelopment Agency's East Gainesville Plan, has a demographic composition that is 43% African American, 43% White, 5% Hispanic, and 5% Asian/Pacific Islander.

Analysis at the neighborhood level revealed, six out of eight public housing developments, occupied primarily by African Americans, are located in geographical areas where the demographic composition is the same. Two developments are located in an area where the population is primarily White, contrasting that of public housing residents.

Regionally, five public housing properties are located in or near the Tower Rd / I-75 Corridor R/ECAP, three properties are located in the SW Student Housing Corridor R/ECAP, and one property is located in the Waldo Road Corridor R/ECAP. Tower Rd / I-75 Corridor and Waldo Road Corridor are predominantly African American and have the same demographics as public housing occupants. The SW Student Housing Corridor has a mixed population of all race/ethnicities, while public housing occupants are mainly African American.

Six more public housing properties are scattered among the region, two in the City of Archer, one in the City of Newberry, two in the City of Alachua, and one in the City of Waldo. The location of these properties in Alachua County is largely populated by Whites, differing from the demographics of public housing occupants.

Project – Based Section 8

Neighborhood level analysis identified, five PBRA properties located in areas predominantly African American, having the same demographics as PBRA occupants. Four properties are located in areas where the population is mainly White, differing from demographics for occupants and six properties are located in areas that have a mixed racial composition.

Regionally, the two developments located in the County, Majestic Oaks and Pine Meadows are located in the Tower Rd / I-75 Corridor R/ECAP and the demographics of the area are the same as occupants, predominantly African American.

Other Multi-Family

The one property designated as other multi-family is located in an area that is predominantly white, differing from that of its occupants.

LIHTC

Low Income Housing Tax Credit properties located within city limits are all located in the Waldo Road Corridor R/ECAP or East Gainesville target area, which are both segregated areas that are predominantly African American, providing the same demographics as occupants of LIHTC properties.

Regionally, there are two LIHTC properties located near Santa Fe Community College where the demographics are mainly white and differing from occupant demographics. One property is located in the Tower Rd / I-75 Corridor R/ECAP, which is predominantly African American, having the same demographics as occupants. Two properties are located along Archer Road, west of I-75, where there is mixed demographics.

c. Disparities in Access to Opportunity

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

Since the majority of publicly supported housing is located in the East Gainesville target area, many public housing residents or voucher holders experience disparities in access to employment opportunities and access to transportation.

Community meetings identified that much of the suitable employment in the jurisdiction, and region, is located in west Gainesville. Having a transportation system that is student oriented does not provide reliable transportation for East Gainesville residents, specifically public housing residents, to access gainful employment across the city.

Additionally, lack of access to suitable transportation leads to many other disparities in access to opportunity for public housing residents including lack of access to proper healthcare and to proficient schools, which are again located in west Gainesville.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.*

Gainesville Housing Authority manages 635 public housing units occupied by 615 families with an average number of members per family being 2.56. Male head of households represent 15% of the public housing population and 84% are female head of households. There are 815 children under the age of 18 residing in GHA's public housing units with the average age of children being 8 years old.

The GHA manages 1,579 Housing Choice Vouchers. Number of families utilizing the HCV program is 1,253 with an average number of members per family being 2.79. Male head of households represent 19% of occupants utilizing the HCV program and 81% are female head of households. There are 1,854 children under the age of 18 residing in units utilizing the HCV program with an average age of 9 years old.

The Alachua County Housing Authority manages 276 public housing units occupied by 199 families with children, 36 elderly, and 111 persons with disabilities. The GHA manages 920 Housing Choice Vouchers being utilized by 258 families with children, 151 elderly, and 624 persons with disabilities.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

The Gainesville Housing Authority holds various events during the year and offers self-sufficiency and independent living programs for its residents. The GHA ensures that all of its residents are linked to the critical support services that provide opportunities for self-sufficiency and / or independent living. It is the expectation that all residents that are capable of transitioning into the workforce and out of GHA housing participate in self-sufficiency initiatives and transition into market rate housing. In addition, independent living program participation is encouraged for all elderly and/or disabled residents.

The GHA offers the Job Training and Entrepreneurial Program (JTEP). The focus of the program is to help residents gain employability skills in order to help them re-enter the workforce or start their own business.

The GHA plans to become a Move to Work (MTW) Organization. MTW will augment the JTEP program as GHA continues to promote resident self-sufficiency among HCV and public housing residents, break the cycle of poverty in the community, provide more beneficial services to low-income families and create administrative efficiencies and cost savings.

The GHA is launching a Youth Program to focus on empowering youth to explore, develop, and express their true capabilities. The GHA will provide wrap-around services for its youth that will enrich and empower them to achieve the winning spirit as oppose to the sense of hopelessness and disadvantaged. Through YJTEP efforts, GHA will play a significant role in restoring hope-for the future and ending generational housing.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing

- Displacement of and/or Lack of Housing Support for Victims of Domestic Violence
- Loss of affordable housing
- Source of income discrimination
- Community opposition
- Lack of access to opportunity due to high housing costs

D. Disability and Access Analysis

1. Population Profile

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

Of the total population in the jurisdiction, 2.25% have hearing difficulty, 1.76% has vision difficulty, 4.08% have cognitive difficulty, 4.83% have ambulatory difficulty, 2.00% have self-care difficulty, and 3.29% have independent living difficulty.

Of the total population for the region, 3.22% have hearing difficulty, 2.27% has vision difficulty, 4.44% have cognitive difficulty, 6.38% have ambulatory difficulty, 2.47 self-care difficulty, and 4.20% have independent living difficulty.

Table 31 Disability by Type				
	City of Gainesville		Alachua County – Gainesville CBSA	
Disability Type	#	%	#	%
Hearing difficulty	2,663	2.25%	7,997	3.22%
Vision difficulty	2,079	1.76%	5,626	2.27%
Cognitive difficulty	4,827	4.08%	11,028	4.44%
Ambulatory difficulty	5,712	4.83%	15,830	6.38%
Self-care difficulty	2,363	2.00%	6,122	2.47%
Independent living difficulty	3,888	3.29%	10,432	4.20%
<i>Note 1: All % represent a share of the total population within the jurisdiction or region.</i> <i>Note 2: Data Sources: ACS</i> <i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i>				

Persons with disabilities are geographically dispersed in various areas of the jurisdiction, with no significant areas of concentrations. Persons with hearing, vision, ambulatory, and independent living

disabilities are not concentrated in any area of the jurisdiction however, persons with cognitive and self-care disabilities seem to be lightly concentrated in the Waldo Road Corridor R/ECAP and the East Gainesville target area.

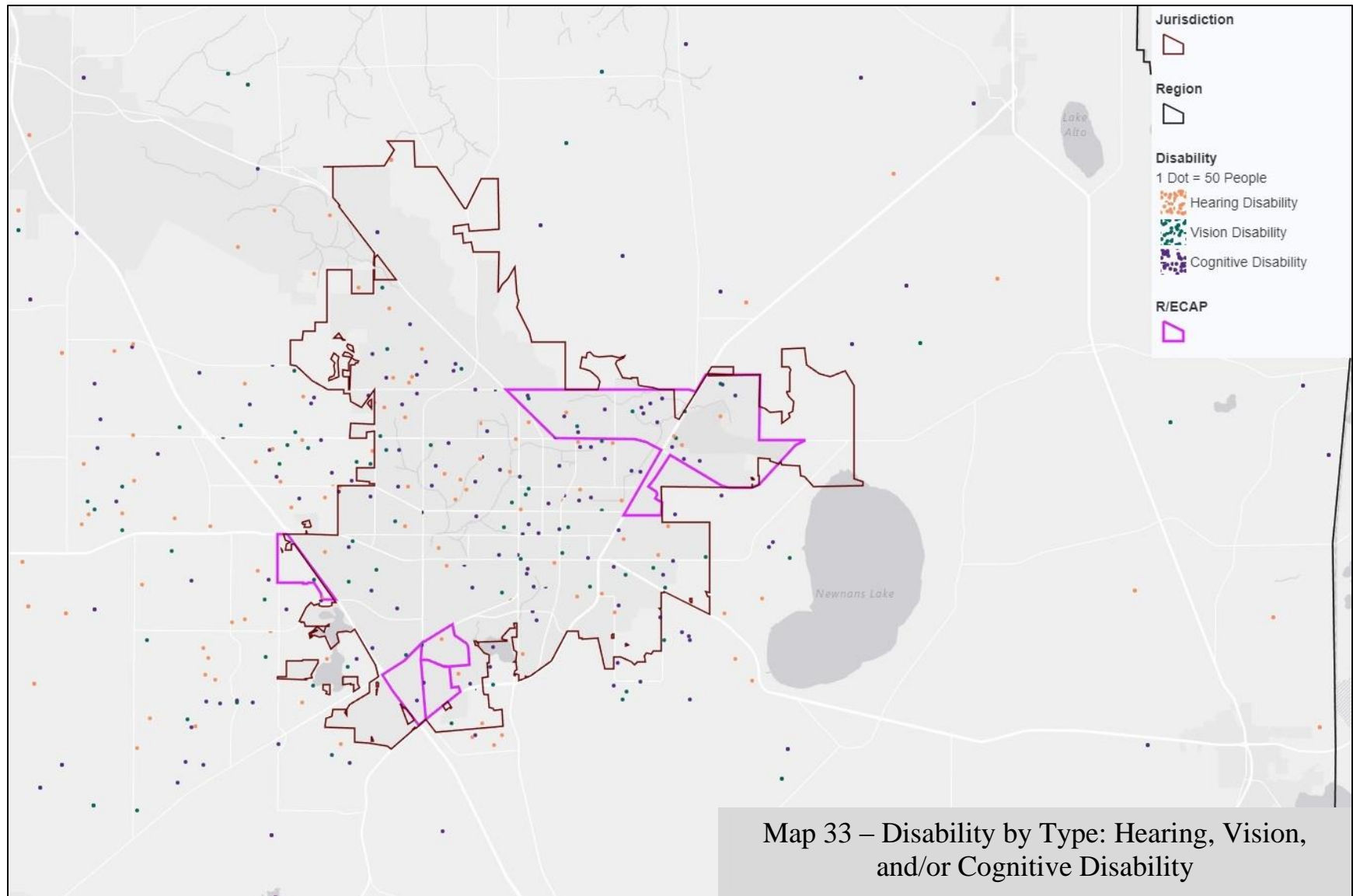
Further out from city limits persons with disabilities are evenly dispersed throughout the region. When analyzing closer to city limits, there appears to be a cluster of persons with disabilities, including all categories, directly northwest and southwest of the Tower Rd / I-75 Corridor R/ECAP.

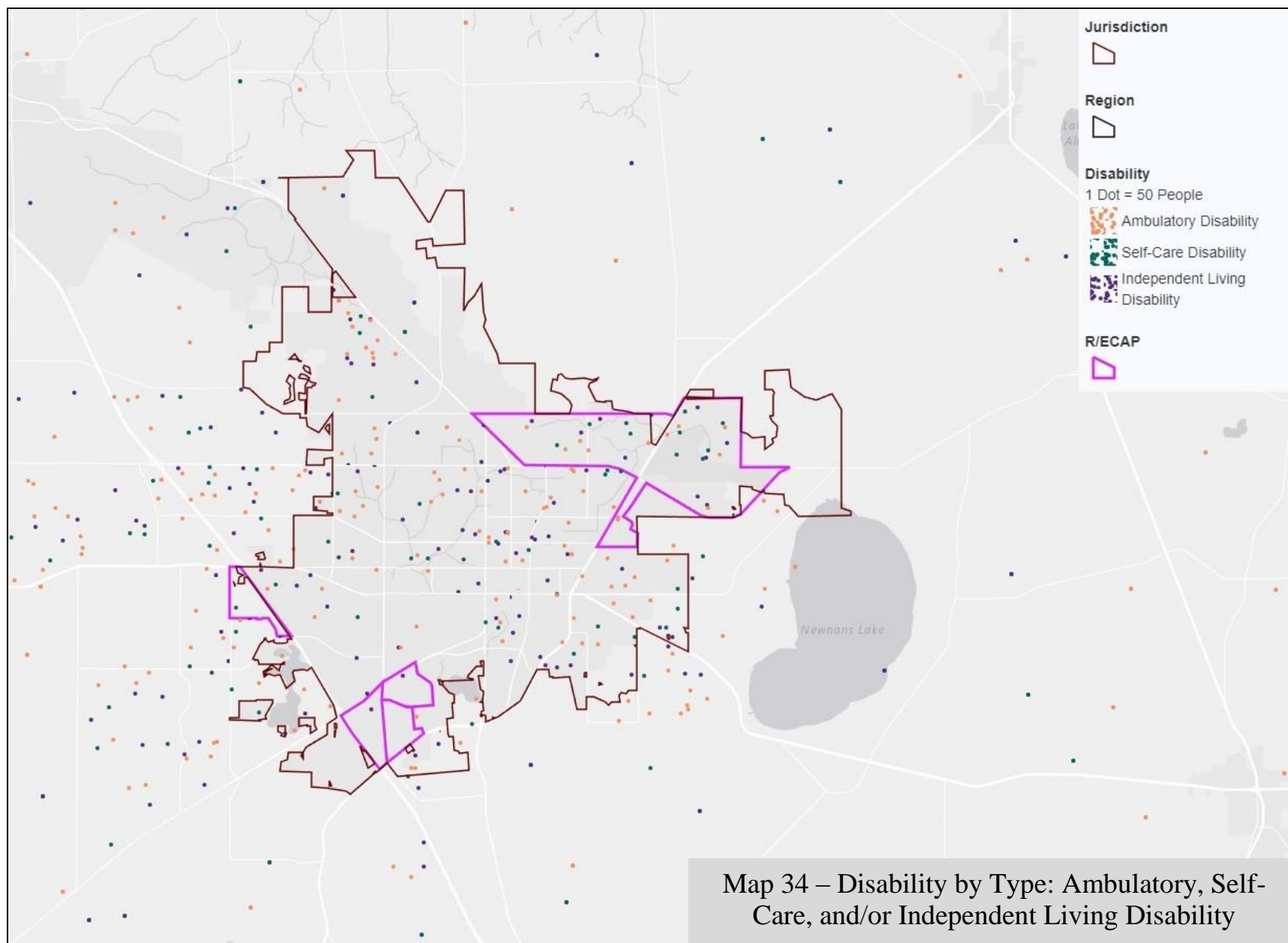
b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

As identified above, there are clusters of persons with cognitive and self-care disabilities in the Waldo Road Corridor R/ECAP and East Gainesville target area in the jurisdiction and regionally, persons with disabilities, including all types, are clustered directly northwest and southwest of the Tower Rd / I-75 Corridor R/ECAP.

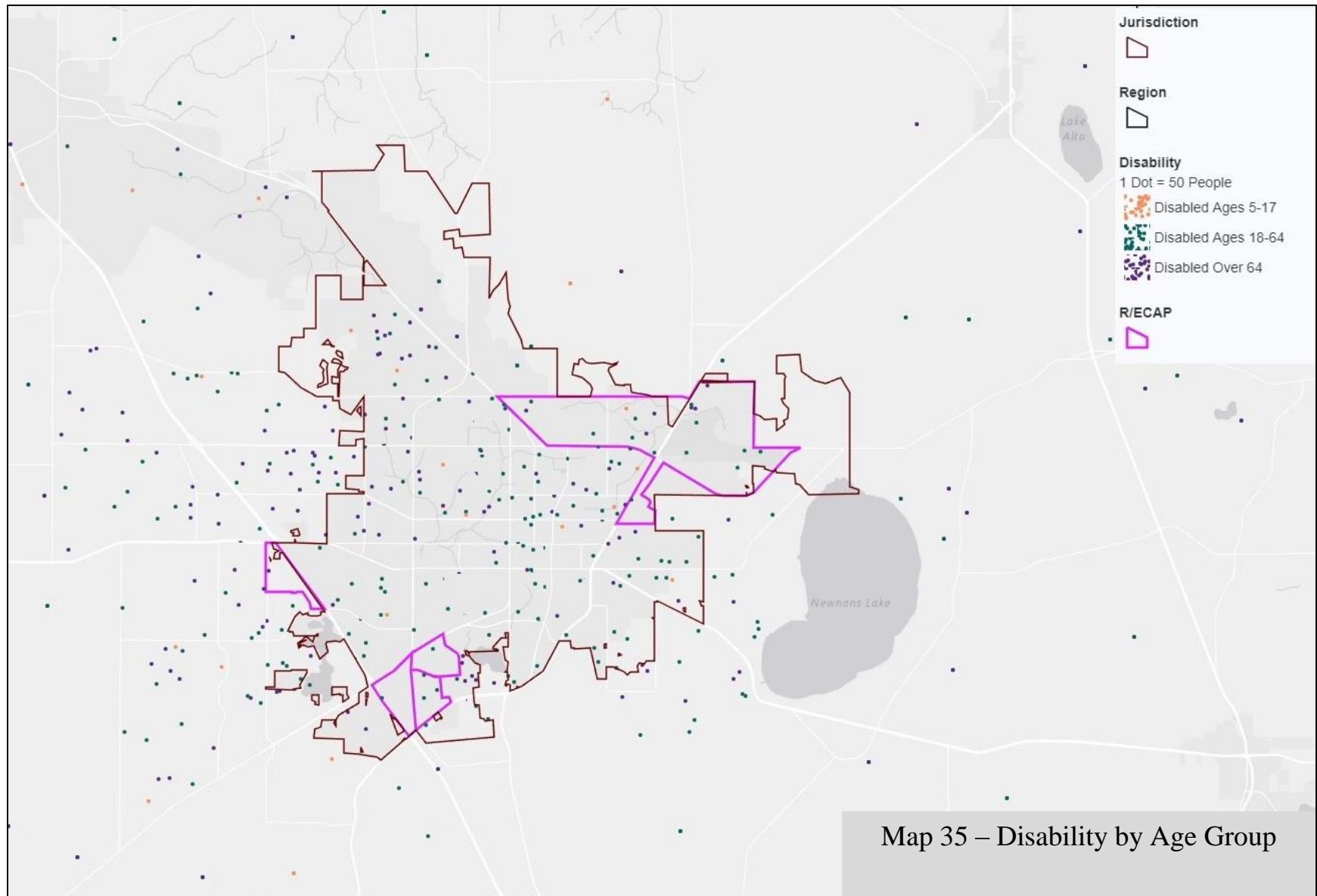
Table 32 Disability by Age Group				
	City of Gainesville		Alachua County – Gainesville CBSA	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	574	0.49%	1,496	0.60%
age 18-64 with Disabilities	7,116	6.01%	16,139	6.50%
age 65+ with Disabilities	3,654	3.09%	11,566	4.66%
<p><i>Note 1: All % represent a share of the total population within the jurisdiction or region.</i></p> <p><i>Note 2: Data Sources: ACS</i></p> <p><i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i></p>				

Geographically, location does vary for persons with disabilities for different age ranges. Persons with disabilities ages 5-17 is minimal with less than 1% representation within the jurisdiction and region. Persons with disabilities ages 18-64 are concentrated in the East Gainesville target area and represent 6% and 6.5% of the population in the jurisdiction and region respectively. Persons with disabilities over the age 64 are geographically concentrated in northwest Gainesville or outside of city limits in Alachua County and represent 3% and 4.6% of the population in the jurisdiction and region respectively.





Map 34 – Disability by Type: Ambulatory, Self-Care, and/or Independent Living Disability



2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Despite efforts by the Association for Retarded Citizens of Alachua County (ARC), there is still a lack of affordable accessible housing available throughout the jurisdiction and region. The ARC currently manages apartments and group homes in the City of Gainesville with a capacity of 70 units and offers additional capacity provided in leased homes located in Alachua County. Units range in size, however the design of group homes often does not allow for units larger than a 2 bedroom. The Arc of Alachua County Developmentally Disabled Housing Services is a HUD Apartment. The ARC offers a residential services program which includes 15 group homes, in-home support services, one 12-unit transitional living apartment complex, and supported living services for those living independently in the community. These programs feature 24 hour staffing, with the exception of the supported living residences, and serve individuals with mild to severe disabilities. Examples of the services provided in these facilities include residential habilitation training, self-care and daily living skills, behavior management, and transportation. The ARC is making more efforts to increase the provision of housing opportunities for the developmentally disabled in the City of Gainesville.

Meridian Behavioral Healthcare Inc. provides additional housing for persons with emotional disabilities. Joyce House is an eight-unit group home for women with emotional disabilities who need and/or prefer a long-term supportive environment in an Immediate Care Facility. All units are one bedroom with an occupancy standard of 1-2 people.

Transitions House, managed by Meridian, is a 15-bed group home for persons with emotional disabilities, offering transitional housing for those whose disability results in conduct or behavior that may put their tendency at risk in housing arrangements with a lesser degree of clinical support.

Sunset and Satellite Apartments are a set of buildings consisting of twenty 1-bedroom units and CHOICE Apartments is a 16-unit complex that is designed for occupancy by 24 people. There are 4 one bedroom units; 8 double-occupancy two bedroom units; and 4 two-bedroom family units.

The GHA and ACHA are making efforts to provide affordable accessible housing for the disabled. The GHA is seeking to apply for 40 vouchers to meet the needs of the disabled. The ACHA's publicly supported housing units currently occupy 735 persons with disabilities with these units ranging in size.

Available affordable accessible housing in the jurisdiction and region does not meet the demand and there are an inadequate number of units offering a range in size. This is something that ARC, Meridian, and the public housing authorities are seeking to remedy. The ARC has been awarded Florida Housing Finance Corporation (FHFC) funds and since 2015 has opened, or is projected to open, three new group homes including Glen Springs Home, Century Oak Home, and Santa Fe Hills Home.

- b. *Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?*

The ARC has several group homes located in northwest and southwest Gainesville and not in R/ECAP or segregated areas of the jurisdiction. Oak Home is located in downtown Gainesville which is near or in the East Gainesville target area.

Meridian's Joyce House and Transitions are both located in southwest Gainesville near the SW Student Housing Corridor R/ECAP, while Choice Apartments is located in the East Gainesville target area and Satellite Apartments is not located in a R/ECAP or identified area of segregation.

The majority of publicly supported housing in the jurisdiction and region is located either in one of the R/ECAP areas or the East Gainesville target area. Since there are no units designated specifically as accessible units, but the housing authorities do have disabled populations occupying units, it can be assumed that these units align with segregated areas in the community.

- c. *To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?*

There are no publicly supported housing units in the jurisdiction or region that are specifically designated for persons with disabilities. However, units are available to persons with disabilities and those applicants are considered through the same process as all other residents. For the jurisdiction and region, 26.59% of persons with disabilities live in public housing, 21.60% live in PBRA units, and 82.61% reside in other multi-family units. For the HCV program 24.63% of persons with disabilities utilize vouchers in the jurisdiction with 22.77% utilizing vouchers regionally.

Table 33 Disability by Publicly Supported Housing Program Category		
City of Gainesville	People with a Disability	
	#	%
Public Housing	163	26.59%
Project-Based Section 8	151	21.60%
Other Multifamily	19	82.61%
HCV Program	334	24.63%
Alachua County – Gainesville CBSA		
Public Housing	163	26.59%
Project-Based Section 8	151	21.60%
Other Multifamily	19	82.61%

HCV Program	479	22.77%
<p><i>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</i></p> <p><i>Note 2: Data Sources: ACS</i></p> <p><i>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</i></p>		

The majority of persons with disabilities, residing in publicly supported housing, live in other multi-family housing. The one development in the community designated as other multi-family is New Horizons Property IV – Choice Apartments, a sixteen unit group home for the chronically mentally ill who are undergoing treatment. This development is located in the East Gainesville target area.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Much of the disabled population lives in group homes located in Gainesville or leased single-family homes in Alachua County. Persons with disabilities living in group homes tend to be more segregated due to needing 24-hour care. The goal is to provide services to both institutionalized and non-institutionalized persons with disabilities so that they can become more independent and live in more integrated settings.

The Center for Independent Living of North Central Florida (CILNCF) offers various programs and services for persons with disabilities that enhance quality of life and increase levels of personal independence. The Center for Independent Living empowers people with disabilities to exert their individual rights to live as independently as possible. Many times, being able to obtain affordable accessible housing or live in integrated settings directly correlates with the level of independent living skills acquired.

With this in mind, CILNCF has developed intensive programming for youth with disabilities. The CILNCF operates a High School High Tech Program designed to provide young people with all types of disabilities the opportunity to explore jobs and postsecondary education leading to technology-related careers allowing them to live in integrated settings.

The CILNCF also operates an Employment Services Program in partnership with the Department of Education, Division of Vocational Rehabilitation Services. The Competitive Employment program focuses on job placement, increasing employability skills, and ensuring long-term success on the job. The CILNCF has been successful in placing individuals with significant disabilities into meaningful employment with a majority of those individuals placed, obtaining jobs above minimum wage and with benefits.

The CILNCF operates a sign language coordination program to ensure the availability of interpreters for individuals who are deaf and offers travel training which is a short-term, comprehensive, intensive instruction designed to teach people with disabilities how to travel safely and independently on public transportation.

These services, and more provided through ARC and Meridian, allow persons with disabilities to move from segregation to integration.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

The three main organizations servicing persons with disabilities in the jurisdiction and region are ARC, Meridian, and CILNCF. As mentioned above, ARC and Meridian offer options for affordable housing and all three organizations provide supportive services for this population.

The ARC manages apartments and group homes in the City of Gainesville with a capacity of 70 units and offers additional capacity provided in leased homes located in Alachua County. ARC also offers a residential services program which includes 15 group homes, in-home support services, one 12-unit transitional living apartment complex. Meridian manages Joyce House and Transitions for persons with emotional disabilities and also has Sunset, Satellite, and Choice Apartments serving the mentally and physically disabled. The GHA and ACHA also provide publicly supported housing that is available to persons with disabilities.

The CILNCF offers services in accordance with the five core services of the independent living philosophy including advocacy, information and referral, independent living skills, peer support, and transition. The CILNCF provides employment training, interpreter services, ADA Para-transit screenings, travel training, disability awareness training, accessibility studies, and builds accessibility ramps when funds are available.

The ARC offers programs providing persons with disabilities an opportunity to acquire and improve skills which allow them to access activities and relationships of their choice. The Adult Day Training (ADT) program offers individuals opportunities for work, education, community integration, recreation and socialization. The ARC also offers vocational training about how to maintain appropriate behaviors in the community and teaching skills that support independence. Individuals also have the opportunity to explore leisure and recreational activities in the community such as bowling, fishing and swimming.

Meridian offers various supportive services to persons with emotional disabilities including crisis services, rehabilitation services, and outpatient services.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

Persons with disabilities are able to access certain government services through partnerships between social service providers and government entities. The ARC partners with the Alachua County School Board to provide adult basic education classes. The CILNCF provides services through partnerships with the Department of Education, the Department of Health, Brain and Spinal Cord Injury Program, as well as the Alachua, Bradford, Citrus, Levy, Marion and Putnam County School Boards. The CILNCF

is also partnered with Florida Telecommunications and Relay, Inc. (FTRI) and is the designated Regional Distribution Center (RDC) of specialized telecommunications equipment.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of Gainesville's Public Works Department is responsible for the planning, design, construction, operation and maintenance of streets, sidewalks, and bike trails systems and management of the storm water system, the urban forest, parking program, and the County-wide traffic management system.

The City of Gainesville funds three concrete crews that maintain and repair sidewalks, curbs, and curb inlets. While priority is given to repairing potentially unsafe facilities, their work contributes to the Department's performance targets of 30 new ADA ramps per year.

Additionally, the City utilizes its CDBG funds when possible to revitalize its public infrastructure including street improvements, street lighting, and ADA accessible pedestrian crossings and signals.

iii. Transportation

Access to transportation has been identified as a barrier throughout the region however, for the disabled, transportation challenges are even greater. The Regional Transit System (RTS) offers ADA Complementary Para-transit service which provides door-to-door service to Para-transit certified people on an appointment basis. MV Transportation is the Community Transportation Coordinator (CTC) for all Para-transit services. MV Transportation processes all Para-transit reservations, customer service and cancellation requests. Service requests must be placed 24 hours before the trip is required. Reservations are taken by MV Transportation Monday –Saturday between 8 a.m. – 5 p.m. and Sunday 9 a.m.- 5 p.m. MV operates Monday thru Friday 5AM to 9PM, Saturday 7AM to 7PM and on Sunday from 9AM to 6PM. RTS provides the service before 5 AM and after 9PM Monday through Saturday in the early morning service area and late night service area. Sunday RTS hours are 9AM to 6PM so there is no late night or early morning service. For early morning or late night service your trip must begin and end in the late night service area.

A Personal Care Attendant may travel free with a certified rider or a working service animal may accompany a certified rider at all times on fixed route and Para-transit service. All buses are wheelchair accessible however, passengers whose wheelchairs exceed the weight standards are required to use the Para-transit service. The RTS lifts are only rated to lift 600 lbs while MV Transportation lifts are rated to 800 lbs.

The fee for ADA Para-transit service is \$3.00 per trip. Individuals who are ADA certified ride free on RTS fixed route buses. People with Medicaid or Medicare may also show their ID card for a reduced fare on fixed route service.

A barrier that is presented for persons with disabilities is that service after 9:00 pm is restricted to within 3/4 of a mile from Routes 1, 5, 9, 12, 15, 16, 20, 34, 35 and 36. Also, reservations have to be made in advance as same day reservations generally cannot be accommodated.

Service providers also try to supplement transportation services to assist in meeting the needs of persons with disabilities. The CILNCF has a strong record of advocacy in the area of accessible public transportation. In support of consumers need for better access, CILNCF is contracted with by area public transportation systems to provide support services for riders with disabilities wanting to utilize fixed route and para-transit services. The CILNCF also provides screening, eligibility determination and travel training services in Alachua, Hernando, and Marion Counties and conducts ADA para-transit screenings for people with disabilities in Alachua and Marion Counties.

Persons with disabilities also have access to the Transportation Disadvantaged Program which effectively coordinates funds and activities to provide older adults, persons with disabilities, and persons with low income access to employment, health care, education and other life sustaining activities. Transportation services are available in all 67 Florida counties for persons who are eligible and have no access to transportation. Services are provided through a statewide network of Community Transportation Coordinators.

iv. Proficient schools and educational programs

Often times educational programs specific to persons with disabilities has to be obtained through service providers, as most public schools do not have the capabilities or tools to sufficiently serve this population. Service providers in the area offer various educational programs, mainly aimed at teaching independent living skills.

The ARC offers adult day programs providing an opportunity for individuals to acquire and improve skills which will empower them to access activities and relationships of their choice. The Adult Day Training (ADT) program offers individuals opportunities for work, education, community integration, recreation and socialization. The training staff works closely with individuals to foster independence and train them in skills needed for work in the community or our onsite workshop. In order to increase the skills necessary for independence and develop each individual's unique gifts, ARC also offers Adult Basic Education (ABE) classes through the Alachua County School Board. Consumers can choose classes based on their interests or needs. Classes offered include cooking, math skills, reading and writing, safety, self-care skills, and arts and crafts. The goal of ABE is to provide consumers with the skills necessary for successful daily living.

Additionally, the CILNCF operates the High School High Tech (HSHT) enrichment program for high school students with disabilities who have an interest in exploring math and science and/or pursuing work in a high tech field. The CILNCF has developed intensive programming for youth with disabilities and operates the HSHT program at six (6) area high schools in five (5) school districts in North Central Florida. High School High Tech (HSHT) was developed out of concern that too few students, especially those with disabilities, were being prepared for technology-based careers. Like other HSHT programs throughout the state, CILNCF's program is designed to provide young people with all types of disabilities the opportunity to explore jobs and postsecondary education leading to technology-related careers. Locally, it is a community-based partnership made up of students, parents and caregivers, businesses, educators and rehabilitation professionals.

v. Jobs

Service providers have programs highly focused on teaching independent living skills and providing employment opportunities for persons with disabilities. Arc-2-Work is a grant-funded job training program designed to increase the employment outcomes for high school graduates and clients of ARC. The program offers a 20-hour curriculum in pre-employment training taught in a classroom setting. Once participants graduate, they are placed in the field to volunteer and gain hands-on experience.

At CILNCF, there is a staff of Certified Rehab Counselors, Employment Consultants and Certified Vocational Evaluators providing intensive and comprehensive employment services in support of client employment goals. The CILNCF also operates an Employment Services Program in partnership with the Department of Education, Division of Vocational Rehabilitation Services. The CILNCF is currently contracted for Vocational Evaluations, Supported and Competitive Employment Services. The Competitive Employment program focuses on job placement, increasing employability skills, and ensuring long-term success on the job. Additionally, CILNCF is partnered with the Bureau of Rehabilitation and Re-Employment Services to provide comprehensive vocational testing and evaluation services. The CILNCF has been successful in placing individuals with significant disabilities into meaningful employment with a majority of those individuals placed, obtaining jobs above minimum wage and with benefits.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

There are several options for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications. Both the City of Gainesville and Alachua County have Equal Opportunity Offices that will provide information or referrals for accommodations. The City of Gainesville's reasonable accommodations process is detailed on the Office of Equal Opportunity webpage, under the tab "Reasonable Accommodation Process".

Alachua County has a Citizens Disability Advisory Committee which is responsible for evaluating and providing assistance in implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA). The committee gives advice or assistance to the Equal Opportunity Director on accessibility.

In addition, persons with disabilities can contact providers serving the disabled such as ARC, Meridian, or CILNCF. These providers can assist with providing information, referring clients to a proper contact, or with the actual modifications depending on the case.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

According to 2015 ACS data, in Alachua County, the homeownership rate for households with a disabled family member is 59.05% which is higher than the overall homeownership rate for the County, based on the same data source, which was 53.94%. A report prepared by the FHDC/Shimberg Center in 2004 titled, Housing Needs and Household Characteristics of Persons with Disabilities in Florida: An Analysis of 2000 Census Data, suggests that there is a statewide pattern of higher homeownership rates

for households which include a person with a disability. This is due to these households typically being headed by persons over age 50, for whom homeownership rates are higher regardless of disability status. The same report found that extremely low-income households that include at least one person with a disability and that are severely cost burdened have a homeownership rate that is lower than overall homeownership rate for households with a disability but the rate is comparable to other extremely low-income, severely cost-burdened households without a disability. Additionally, the report found that the lower homeownership rate is more attributable to lower incomes rather than disability status. According to the 2015 ACS, in Alachua County, there are 5,184 households with income below 50% AMI with a disabled household member and 1,227 or 23.67% are homeowners. Households with similar characteristics with the exception of a disabled household member own at a rate of 23.39%. This data suggests that persons with disabilities have the same challenges with homeownership as persons without a disability and lower income persons with a disability will require financial assistance to achieve homeownership. The data however does not address challenges finding units that are accessible and with the aging, affordable housing stock in Gainesville and the region, persons with disability have challenges finding affordable housing with accessible design elements.

5. Disproportionate Housing Needs

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

The 2013 CHAS provides data on the housing needs of households with a disabled family member. In Alachua County, there were 34,465 households with a disabled household member (this count may be duplicated if the household member has more than one type of disability) and 14,365 or 42.93% of these households had at least one of four housing problems (lack complete kitchen facilities, lack complete plumbing facilities, overcrowded, cost burdened). Disabled household members with a cognitive disability experience a higher rate of housing problems than persons with other types of disabilities. Approximately 46.15% of persons with cognitive difficulty experience a housing problem compared to 42.40% for persons with ambulatory difficulty, 41.73% for persons with self-care or independent living difficulty, and 37.10% for persons with a hearing or vision difficulty.

6. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.*

There is no additional local data or knowledge available relevant to disability and access issues in the jurisdiction or region, with respect to religion, sex, pregnancy, or national origin.

- b. The program participant may also describe other information relevant to its assessment of disability and access issues.*

No additional information is available.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of affordable in-home or community-based supportive services
- Loss of Affordable Housing
- Source of income discrimination
- Access to transportation for persons with disabilities

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

1. Fair Housing Enforcement

List and summarize any of the following that have not been resolved:

- *A charge or letter of finding from HUD concerning a violation of a civil rights-related law;*
- *A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;*
- *Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;*
- *A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;*
- *A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or*
- *A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.*

The City of Gainesville's Office of Equal Opportunity, and Alachua County's Equal Opportunity Office confirmed that there are no unresolved cases.

During the week of May 16-20, 2005, HUD conducted a compliance review of GHA's public housing and multi-family housing sites. The review included a Fair Housing/Equal Opportunity Assessment of program operations to include the admission process, tenant election process, occupancy, designated

accessible units, the common areas and housing and non-housing programs and activities. The review concluded there were areas of deficiencies related to physical accessibility of common areas and individual housing units, as well as deficiencies in GHA policies and procedures. GHA acknowledged the findings and sent HUD a letter agreeing to negotiate a Voluntary Compliance Agreement (VCA) on October 26, 2005. On July 18, 2006, a corrective action order was issued by HUD that restricted the use of capital funds and ROSS grant funds. This seriously limited the use of these funds for operational projects. During the week of June 4-8, 2007, GHA and HUD met to negotiate the terms of the VCA. A settlement was reached on all issues except for the amount of funds available in the claims funds. During November 2007, HUD and GHA reached an agreement on the level of funding in the claims fund. This amount was set at \$125,000; this amount includes the combined funds available for GHA's public housing and Section 8 New Construction housing programs. The process was finalized in December, 2007.

2. Fair Housing Law

Describe any state or local fair housing laws. What characteristics are protected under each law?

Florida Fair Housing Act

Title XLIV, Chapter 760 of the Florida Statutes, Civil Rights, covers discrimination in the treatment of persons and minority representation. Part II, the Florida Fair Housing Act, (ss. 760.20 – 760.37), prohibits discrimination in the sale, rental, advertising, financing, or provision of brokerage services for housing. The Florida Fair Housing Act is substantially equivalent to the federal Fair Housing Act (FHA) and protects persons from housing discrimination on the bases of race, color, religion, national origin, sex, pregnancy, disability, and familial status. The Florida Commission on Human Relations (FCHR) is responsible for enforcing the Florida Fair Housing Act.

Alachua County Human Rights Ordinance

Alachua County's human rights ordinance, Chapter 111, Article III, Section 111.40 Discrimination in Housing, prohibits discrimination in the sale, rental, advertising, financing, or provision of brokerage services for housing. Alachua County's human rights ordinance protects persons from housing discrimination on the basis of race, color, religion, national origin, sex, marital status, age, disability, sexual orientation, and gender identity or expression. The Alachua County Equal Opportunity Office is the designated office responsible for administering the ordinance.

City of Gainesville Human Rights Ordinance

Chapter 8 of the Gainesville Code of City Ordinances protects against housing discrimination. The ordinance prohibits discrimination in the sale, rental, advertising, financing, or other housing related activity. The ordinance protects persons from housing discrimination on the basis of race, color, gender, religion, age, national origin, marital status, disability, gender identity, or sexual orientation.

3. Fair Housing Outreach and Resources

Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

There are only a few local and regional agencies/organizations that provide fair housing information, outreach, and enforcement in the Alachua County area. The list below includes program participants in this AFH, as well as other groups working on fair housing discrimination in the region.

- Alachua County Equal Opportunity Office. Funded through County general revenue, with 4.75 full-time employees.
- City of Gainesville Office of Equal Opportunity. Funded through City general revenue.
- Three Rivers Legal Services. Principally funded through the Legal Services Corporation (LSC). No HUD funding.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

There are few cases filed for housing discrimination in the region. The City of Gainesville Office of Equal Opportunity, responsible for administering fair housing cases across the County, reports the following housing complaints:

Table 34 City of Gainesville – Office of Equal Opportunity – Housing Complaints					
Date Filed	Agency Case #	Basis	Status	Respondent	Jurisdiction
2/19/2015	EO-E-2015-11	Disability	Mediation/Settlement	Horizon House/Sunset Apartments	City of Gainesville
5/5/2016	EO-E-2016-09	Disability	Mediation/Settlement	Archer Woods Apartments	City of Gainesville
11/2/2016	EO-E-2017-01	Age	Pending	Village Crossing Apartments	City of Gainesville
12/20/2016	EO-E-2017-06	Gender Identity and Sexual Orientation	Pending	Whitney Mobile Home Park	City of Gainesville
2/15/2017	EO-E-2017-12	Disability	Withdrawn by Complainant (Resolution made between parties - Issue remedied)	Creek Forest Apartments	City of Gainesville
<i>Source: City of Gainesville Office of Equal Opportunity</i>					

Following consultation with local fair housing service providers and enforcement entities, the paucity of official records on housing discrimination complaints may be due, in part, to challenges in categorization. Many complaints enter the system, by way of a direct phone call or solicitation for legal services, as a concern with a landlord, a housing code violation, or other non-discrimination-specific. These are then filed under a category of complaint not specifically labeled as housing discrimination.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing law

V. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Table 35 Contributing Factors Related to Fair Housing Issues		
Contributing Factor	Related Fair Housing Issue	Priority Level
Displacement of residents due to economic pressures	Segregation/Integration R/ECAPs Disproportionate Housing Needs Publicly Supported Housing	Low
<p>Discussion:</p> <p>Gentrification is a concern in Gainesville, and as the redevelopment of certain neighborhoods in East Gainesville materialize, residents have expressed concern about rising rents, pricing out lower-income households. While some gentrification may be occurring, census data shows that median contract rent in Gainesville has remained relatively steady over the last 10 years and has been decreasing since 2012.</p> <p>While working to prevent displacement of residents due to economic pressures is important, a higher current priority is improving conditions in East Gainesville and reducing disparities in access to opportunities. That may be accomplished through strategies such as coordinated public and private investment and addressing social and economic disparities. The City, the County and their partners will continue to plan and implement revitalization projects that include significant input from residents of these neighborhoods as stakeholders and seek to mitigate displacement, making this contributing factor a low priority.</p>		

<p>Lack of private investments in specific neighborhoods</p>	<p>Segregation/Integration</p> <p>R/ECAPs</p> <p>Disparities in Access to Opportunity</p> <p>Disproportionate Housing Needs</p> <p>Publicly Supported Housing</p>	<p>High</p>
<p>Discussion:</p> <p>East Gainesville is a high poverty area that is predominantly occupied by racial and ethnic minorities. Like most R/ECAPs and segregated areas, East Gainesville lacks access to transportation, high performing schools, businesses, jobs, and services. The area is known for older, low-density residential housing units, a concentration of publicly supported housing, high crime levels, and abandoned and dilapidated structures.</p> <p>Over the years, the City of Gainesville and the CRA has invested federal, state, and local public funds in East Gainesville to attract economic development and spur growth in the area. In addition, some private investment has been occurring in East Gainesville in projects supported by UF as well as other public-private partnerships however, private investment is difficult to attract to areas like East Gainesville and the level of private investment that is occurring is not enough to change the state of housing, improve the economy, and increase opportunities in the area.</p> <p>The lack of private investment is a high priority because public resources are limited and have dwindled over the years and involvement from the private sector is key to transforming East Gainesville into an area of opportunity. The City will need to engage in strategic planning that targets investments in a coordinated manner and that involves financial institutions, non-profits, developers, corporations, and other interested groups in order to maximize the impact on the area. Long term commitment from the public, private, and non-profit sectors is needed to bring about change to East Gainesville and similar neighborhoods, making this contributing factor a high priority.</p>		

<p>Land use and zoning laws</p>	<p>Segregation R/ECAPs</p> <p>Disparities in Access to Opportunity</p> <p>Disproportionate Housing Needs</p> <p>Publicly Supported Housing</p>	<p>High</p>
<p>Discussion:</p> <p>Barriers to affordable housing, including government regulations and public policies, can limit housing choice and perpetuate segregation and other fair housing issues because land use laws determine where housing is allowed and which types of housing are allowed. Land use laws also affect the cost of housing. Although neither the City of Gainesville’s or Alachua County’s zoning ordinances intentionally excludes or discriminates against individuals protected by the fair housing law, there are current policies that increase the cost of developing affordable housing or dis-incentivizes the development of lower income housing in high opportunity areas.</p> <p>The City and the County have incentives and policies that encourage the development of affordable housing. For example, affordable housing projects do not undergo special hearings if they are in full compliance with the zoning ordinance and other development regulations, accessory dwelling units are permitted as a right in single-family residential zones, in 2017 the County adopted cottage neighborhoods policies to provide for infill developments with higher density, the County has substantially eliminated minimum lot size requirements and reduced setbacks within residential zoning districts, and several incentives are provided to developers of affordable housing including expedited permitting and approvals, the reduction of parking and setback requirements, density bonuses. As of October 1, 2017, Alachua County established half-priced building permit fees for existing homesteads valued at less than \$50,000 and half-priced development review fees for new development projects on the eastside of the unincorporated Urban Cluster (designated in the County’s Comprehensive Plan). However, these incentives need to be more widely promoted and developers educated on the incentives for them to be effective.</p> <p>There are however some government regulations that directly increase costs to builders and developers. Impact and connection fees increase the cost of construction of a new single-family home by as much as 10% or more according to local developers. Alachua County has an authorized Impact Fee Assistance Program that subsidizes/pays impact fees for affordable housing from the County’s general budget. The County discontinued the program due to underutilization after the housing bubble bust when new housing construction declined and the program has not been funded in several years due to funding constraints. The City of Gainesville also provided a water/sewer connection fee reduction program however in 2016, the City altered the ConnectFree program to allow eligible property owners in the GRU service area that have well water and sewer tank systems to switch to City water and sewer. Priority is given to low-income households and properties located in low-income areas. Currently, neither the City of Gainesville nor Alachua County reduces or waives impact fees impact fees to developers.</p> <p>Neither the City nor the County has adopted an inclusionary zoning policy that would promote the inclusion of lower-income housing on the west side of the</p>		

City and de-concentrate affordable housing in East Gainesville.

Policies or practices that promote the production of affordable housing or that encourages mixed-income communities in high opportunity neighborhoods benefits all residents in the jurisdiction and region because of access to good schools, housing near jobs and transit, and more diverse communities overall, making this contributing factor a high priority.

Location and type of affordable housing	Segregation/Integration R/ECAPS Disparities in Access to Opportunity	High
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Discussion:

There are concentrations of publicly supported housing including public housing, housing choice voucher units, project-based Section 8, and LIHTC projects in East Gainesville as well as in the Waldo Road Corridor, the SW Student Corridor, and Tower Road/I-75 Corridor R/ECAPS.

The location of much of the assisted housing in R/ECAPS and segregated areas limits fair housing choice and access to opportunity for individuals who are members of protected classes because they are disproportionately lower income persons or households that need affordable housing, making this contributing factor a high priority.

Other – Income and education disparities	Segregation R/ECAPS Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
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Discussion:

There are historically segregated areas in the City and the region, however, the overall level of racial segregation between non-white/White individuals is low in both the City and the region. That fact suggests that the continued pattern of segregation can be attributed to a rise in economic segregation.

Income and education disparities refer to gaps in education, income, and wealth along racial lines stemming from generational poverty. When households are segregated by income, it affects every aspect of their lives including access to transportation, good schools and employment opportunities. Housing choice is also restricted because of unaffordability. According to the 2015 ACS, the median household income by race/ethnicity in Gainesville is as follows: White alone, not Hispanic - \$40,012; African American - \$24,349, and Hispanic - \$23,027. The median contract rent was \$688 and the median home value was

\$141,500. Based on industry standard of affordability, earning three times the cost of the housing, households in Gainesville would need to earn \$27,520 to afford the median contract rent and \$47,167 to afford the median home value. The analysis shows that there is a shortage of affordable housing and the majority of the publicly supported housing is located in East Gainesville which has resulted in a concentration of lower income households, majority of whom are minorities, thus resulting in R/ECAPs.

Regarding education, the school proficiency index shows that African Americans continue to experience inequality in access to education especially in East Gainesville. If not addressed, educational disparities will make it harder for individuals and families to escape poverty.

Past experience suggests that greater economic segregation will lead to a growing number of low-income households residing in disadvantaged neighborhoods. Residents of those neighborhoods often face challenges like inadequate access to services and jobs, poor performing schools, lack of quality housing, and unreliable transit. Evidence suggests that addressing disparities in educational attainment will improve job opportunities and provide stability for families, while allowing them to become financially independent thus increasing housing options, making this contributing factor a high priority.

Deteriorated and abandoned properties	R/ECAPS	High
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Discussion:

Substandard housing is prevalent in specific neighborhoods within the City and there is especially a shortage of affordable housing in good condition. An indicator of blight and abandonment in a community is the percentage of residential properties built before 1970. According to 2015 ACS data, approximately 21% of housing units in Alachua County and 27% of housing units in Gainesville were built before 1970. However, in East Gainesville (census tracts 5, 6, and 7) over 54% of the housing units were constructed before 1970. Plan East Gainesville, also indicated that approximately 10% of the neighborhoods east of Waldo Road were abandoned, dilapidated, or boarded-up. Other indicators of blight and abandonment include percentage of residential properties with code violations, percentage of homes with delinquent taxes, and number of completed mortgage foreclosures.

The presence of dilapidated properties in a particular neighborhood drives down property values and the ability to accumulate equity for homeowners including those with protected characteristics. The presence of deteriorated and abandoned properties also discourages private investment, making this contributing factor a high priority.

Lack of public investment in specific neighborhoods	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing	High
Discussion: <p>The City of Gainesville is divided along racial and economic lines and the areas of segregation and concentrated poverty require significant investments in order to transform them into areas of opportunity. In regard to place-based investment strategies, the City and the CRA have committed and expended a significant amount of funding in East Gainesville and have also been successful in attracting some private investment. However, there are concerns of disparities in the provision of services and amenities including the provision of quality housing, parks and recreational facilities, infrastructure (streets) and services including schools, transportation, and economic development programs.</p> <p>There is a need for increased public investment that is strategically targeted in the R/ECAPs to attract more private investment as well as policy changes that incentivizes investment in these neighborhoods in order to stop the decline, making this contributing factor a high priority.</p>		
Availability of affordable units in a range of sizes	Disproportionate Housing Needs	High
Discussion: <p>There is a shortage of affordable housing in Gainesville and in the region. In Gainesville over 45% of the population is experiencing a housing problem and 26% of the population is severely cost burdened. Individuals with protected characteristics are disproportionately low- and moderate-income (LMI) and 70% of the LMI households in Gainesville are cost burdened including 46% experiencing severe cost burden. In the region, 39% of the overall population has a housing problem and 20% are severely cost burdened. Additionally, renters are experiencing housing cost burden at a greater rate than homeowners.</p> <p>Regarding the need for affordable housing in a range of sizes, non-family households (one person living alone or two or more persons who share a dwelling but do not constitute a family) and large families (more than 5 members) experience higher rates of housing problems than small family households. Non-family households In Gainesville are twice as likely to be severely cost burdened than both small and large family households, a fact that is also similar in the region.</p> <p>In addition to the overall shortage of affordable housing, low- and moderate-income persons, persons with disabilities, families with children, and persons with other protected characteristics that rely on affordable or publicly assisted housing have limited affordable housing choices in integrated areas or areas of opportunity.</p>		

The ability for persons to choose where they live is dependent on having realistic housing options that meet the financial needs as well as the health and safety needs of the households and are located in areas with access to opportunity, making this contributing factor a high priority.

Lack of community revitalization strategies

**Segregation/Integration
R/ECAPs**

High

Discussion:

There are segregated areas in the City and R/ECAPs in both the City and the region that lack private and public investment, where there are disparities in the provisions of services and amenities, and where there is a significant lack of access to opportunities.

The City utilizes the majority of its CDBG and HOME funding in low- and moderate-income neighborhoods that overlap with CRA areas and the R/ECAP areas, however, the funds are committed to specific projects that are often standalone projects that are not part of a comprehensive community revitalization effort.

In order to have a transformative impact on these areas, the City, Alachua County, GHA, ACHA, and the private sector partners will all need to work together to develop a realistic revitalization plan that strategically targets funding, and that will help to attract additional private resources. Eventually, this can result in integration and better access to opportunities in the R/ECAPs, making this contributing factor a high priority.

Location of proficient schools and school assignment policies

Disparities in Access to Opportunity

High

Discussion:

There are significant disparities in educational outcomes by race/ethnicity, with African Americans suffering the worst with access to proficient schools. East Gainesville schools suffer from poor facility conditions, low enrollment, and poor performance on standardized tests designed to measure the quality of the education provided. Reactive approaches to infrastructure and facility plans lead to disproportionate investment in high-population growth areas in West Gainesville and neighboring County communities. This results in a self-reinforcing cycle where school investment encourages population growth, leading to further investment in high-growth neighborhoods. East Gainesville and neighboring county communities suffer as a result, making this contributing factor a high priority.

Location of employers

Disparities in Access to Opportunity

High

Discussion:

Significant disparities in access to strong labor markets and job proximity by race/ethnicity are present in the City and County. This is due, in part, to the spatial concentration of job opportunities in West and Southwest Gainesville (census tracts along West University Ave and SW Archer Road, for instance)

and neighboring county tracts (according to the HUD Job Proximity Index), while low-income families and a disproportionate number of African American families live in East Gainesville and neighboring County communities. This general pattern of commercial activity in the West and generational living patterns in eastern portions of the study area contributes to disparities in access to quality jobs, making this contributing factor a high priority.

Availability, type, frequency, and reliability of public transportation

Disparities in Access to Opportunity

High

Discussion:

There is a lack of frequent and reliable public transportation in most areas of Alachua County, including areas to the East of Gainesville where many low-income and protected class residents live. Further exacerbating the challenges of relying on public transportation for daily use, areas in Northwest and West Gainesville, and in the County just outside the City boundary, are areas with the highest number of job opportunities. This relationship between strong job centers to the West with a disproportionate concentration of protected class members in East Gainesville and East Alachua County places an undue burden on protected classes, making this contributing factor a high priority.

Lack of access to opportunity due to high housing costs

Disparities in Access to Opportunity

High

Discussion:

High-opportunity neighborhoods are largely concentrated in West Gainesville and in neighboring County census tracts, as detailed in a review of opportunity indices. Simultaneously, these same communities feature some of the region's most expensive housing markets. This reality forces lower-income families to live in areas with significantly lower spatial proximity to opportunities like jobs and education. Low-income families are disproportionately protected-class members, making this contributing factor a high priority.

Private discrimination

Segregation/Integration
RECAPs
Disparities in Access to Opportunity

Medium

Discussion:

Community input indicates that low-income and protected class members face high levels of unreported housing discrimination from private housing providers. Of particular concern is discrimination on the basis of criminal background. A significant portion of landlords in the region are not aware of HUD guidance on the use of blanket criminal background check policies issued in 2015. Community members reported exclusion from housing opportunity due to

a criminal background, even if the recorded offenses occurred many years in the past, or for minor offenses, making this contributing factor a medium priority.

Access to financial services

Disparities in Access to Opportunity

Medium

Discussion:

There are FDIC-insured bank locations concentrated in West Gainesville and in neighboring County communities, and less predominant locations in East Gainesville and in neighboring County communities. Given the concentration of protected class members in East Gainesville, this raises slight concerns related to access to financial services in these communities, making this contributing factor a medium priority.

Loss of Affordable Housing

Segregation/Integration
RECAPs
Disparities in Access to Opportunity
Disproportionate Housing Needs
Publicly Supported Housing
Disability and Access

High

Discussion:

An ageing housing stock is causing the loss of affordable housing throughout the region. Many homes in the region, specifically in the East Gainesville target area, do not meet housing quality standards. Deterioration of the current affordable housing stock causes high utility costs and presents hazardous conditions, often resulting in low income residents having to leave their homes.

Gentrification is occurring as the region accommodates the growing needs of the local and state colleges, pushing low income residents in the SW Student Housing Corridor RECAP and East Gainesville target area further out of the city and into the region's rural areas. What is commonly known as affordable housing in these RECAP or target areas is being renovated to accommodate growth and is forcing low income persons to seek alternative housing.

Alachua County is also experiencing a loss in landlords that will participate in voucher programs, specifically the VASH program, due to issues with tenants such as substance abuse, drug usage, buying and selling of drugs, and damage to units.

Further, Public Housing Authorities (PHAs) are hampered by Federal regulations when they try to change and grow. Funding is primarily provided at the State level through tax credits that are awarded by the Federal government and funding at an affordable rate is highly competitive and can take years for

adequate funds to redevelop aged housing stock. These constraints add to the affordable housing crises in the City and County, making this contributing factor a high priority.

Displacement of and/or lack of housing support for victims of DV

**Publicly Supported Housing
Disproportionate Housing Needs**

Medium

Discussion:

Many victims of domestic violence, in an interpersonal relationship, rely financially on their offender. This level of dependence makes it difficult for victims of domestic violence to afford or maintain housing on their own, resulting in the inability to obtain housing upon being displaced. Further, the offender has isolated the victim from family and friends who could offer financial assistance. Financial dependence remains as a barrier to victims of domestic violence, specifically when required to provide large deposits and money up front for housing. Supportive housing is limited throughout the region, however, the conversation has begun within Alachua County to implement more supportive housing, making this contributing factor a medium priority.

Community Opposition

Publicly Supported Housing

High

Discussion:

A significant barrier to increasing affordable housing and developing publicly supported housing in the region is the Not In My Back Yard Syndrome (NIMBYism). The Gainesville Housing Authority and the Alachua County Housing Authority are both met with opposition from the community. There is a stereotype associated with public housing residents and Housing Choice Voucher participants that is hard to overcome.

While it is recognized that subsidized housing is needed, there is also the perception that it should be contained – not in my backyard – so to speak; and, part of this misperception is due to generational poverty. The inability to develop public housing in locations accessible to reliable public transportation and better economic opportunities acts as a barrier to increasing affordable housing and to supporting upward mobility for public housing residents, making this contributing factor a high priority.

Lack of affordable, accessible housing in range of unit sizes

Disability and Access

Medium

Discussion:

Affordable, accessible housing is limited throughout the region. The majority of housing for persons with disabilities is provided through group homes, with a very small portion of this population living independently. The group home environment does not allow for a range in unit sizes and usually only provides 1-2 bedroom units. Persons with disabilities living independently, in units with more than 2 bedrooms, are often forced from their homes due to high cost of

retrofitting for accessibility. Efforts to increase affordable, accessible housing continue through organizations such as ARC, Meridian, and the local housing authorities, making this contributing factor a medium priority.

Lack of affordable, integrated housing for individuals who need supportive services

Disability and Access

High

Discussion:

Much of the disabled population lives in group homes located in Gainesville or leased single-family homes in Alachua County. Persons with disabilities living in group homes tend to be more segregated due to needing 24-hour care. The goal of organizations serving this population is to provide services to both institutionalized and non-institutionalized persons with disabilities so that they can become more independent and live in more integrated settings.

There is limited affordable integrated housing for persons with disabilities throughout the region, and very few units specifically designated for persons with disabilities. Regionally, supportive services for persons with disabilities are largely available through organizations serving this population such as ARC, Meridian, and CILNCF. Disabled persons residing in group homes, managed by these organizations, have better access to supportive services. For non-institutionalized persons with disabilities, access to transportation is a significant barrier to receiving essential supportive services, often eliminating the opportunity to live independently and perpetuating the cycle of segregation, making this contributing factor a high priority.

Access to transportation for persons with disabilities

Disability and Access

High

Discussion:

For the general population within the region, access to transportation continues to be an impediment and it is even greater for persons with disabilities. The Regional Transit System is largely driven by the student population in the City of Gainesville. Bus line transportation routes and schedules are designed to serve the students of the local colleges and universities, specifically the University of Florida.

The Regional Transit System does offer ADA complementary para-transit service which provides door-to-door service to para-transit certified people on an appointment basis, however, service after 9:00 pm is restricted to within 3/4 of a mile from certain routes. Also, reservations have to be made in advance as same day reservations generally cannot be accommodated and bus service in Alachua County is unavailable, limiting access to essential services, healthcare, and educational or employment opportunities.

Though service providers try to supplement transportation services to assist in meeting the needs of persons with disabilities, supplemental transportation is

limited and public transportation does not sufficiently serve this population, making this contributing factor a high priority.

Lack of affordable in-home or community-based supportive services

Disability and Access

Medium

Discussion:

There are three primary organizations providing supportive services for persons with disabilities throughout the region including ARC, Meridian, and CILNCF. Most services are provided on location of each organization. In home supportive services are limited and can be costly. These service providers operate as 501(c)(3) non-profit organizations so lack of funding is often a barrier in providing affordable in-home or community-based services.

Limited resources makes it difficult to sufficiently meet the needs of this population, however, these organizations do provide an extensive array of services with the funding they have, making this contributing factor a medium priority.

Lack of Local Private Fair Housing Outreach and Enforcement

Fair Housing Enforcement, Outreach Capacity, and Resources

Medium

Discussion:

There is a general lack of private market understanding of the latest fair housing rules and requirements, especially related to criminal background check policies circulated by HUD. Further, this study reports a general lack of FHIP agencies operating in the study area, leading to poor outreach and education related to fair housing issues.

Given the ongoing concerns related to criminal background check policy from HUD, and the need for outreach related to those policies, the region requires a more intense outreach and public awareness campaign for these matters, making this contributing factor a medium priority.

Lack of Resources for Fair Housing Agencies and Organizations

Fair Housing Enforcement, Outreach Capacity, and Resources

High

Discussion:

There is a lack of funds available for fair housing agencies and organizations operating in the study area. There are no FHIP agencies operating in the area, and legal aid agencies do not have specific core functions around fair housing testing, outreach, or enforcement.

Stakeholder feedback also suggests a significant number of fair housing cases are categorized as non-housing related and handled through other funding sources. This fact reinforces the perception that fair housing cases are underreported in the region. Increased funding could result in stronger fair housing enforcement, education, and outreach, making this contributing factor a high priority.

2. *For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.*

Through this Fair Housing Analysis and community participation process, participants have identified the following Fair Housing Goals and related metrics to be carried out during Program Years 2018-2022. Upon HUD's approval of the Assessment of Fair Housing, participants will initiate the implementation of goals and metrics at the start of their 2018 Program Year.

Table 36 Fair Housing Goals					
#	Goal	Contributing Factors	Fair Housing Issues	Timeframe for Achievement	Responsible Program Participant(s)
1	Increase the production and preservation of affordable housing units in a range of sizes in R/ECAPs and in high opportunity areas	Land use and zoning laws Availability of affordable units in a range of sizes Location and type of affordable housing Deteriorated and abandoned properties	Segregation/Integration R/ECAPs Disparities in Opportunity Disproportionate Housing Needs Publicly Supported Housing	PY 2018 -2022	City of Gainesville Alachua County

		Loss of affordable housing			
		Lack of access to opportunity due to high housing costs			

Metrics/Milestones/Recommendations:

- Within 1 year, establish a formal process for the review and revision of rules, regulations, and development standards that impact the supply of affordable housing.
- Within 1 year and annually thereafter, meet with developers of affordable housing to provide technical assistance that informs them about developer incentives and resources that are available for the production/preservation of affordable housing and encourage them to take advantage of these programs.
- Within 1 year, develop an interactive map that identifies sites in high opportunity areas in the City and the County that are suitable for the development of affordable housing.
- Within 2 years, study the adoption of a zoning ordinance that provides additional incentives and requirements for mixed-income housing in new developments.
- Within 2 years, explore other strategies that can increase the stock of affordable housing including establishing a CLT or establishing a local housing trust fund to provide additional resources for affordable housing.
- Continue existing programs to rehabilitate substandard housing and replace dilapidated housing units to improve the quality of the existing affordable housing stock.

Discussion:

There is an overall shortage of affordable housing in the jurisdiction and the region and the groups most impacted include low-income renters and non-family and large family households. Increasing the supply of affordable housing will increase fair housing choice and access to opportunity because lower income individuals and households are disproportionately protected class members. Given the pattern of segregation in Gainesville, there needs to be a two-fold approach to promoting integration. One approach includes maintaining and preserving the existing affordable and publicly assisted housing stock and encouraging new construction of mixed income housing in R/ECAPs. This approach is intended to reduce disproportionate housing needs and combat segregation and disparities in access to opportunity by attracting reinvestment in these areas. The second approach is to incentivize affordable housing development in high-opportunity areas with better access to opportunities like good schools, job centers, and reliable transportation.

Improvements to the zoning and development regulations may increase the supply of affordable housing and fair housing in both the City and in the region. Since land use and zoning policies influence the location, size, and cost of housing, zoning provisions that restrict the development of affordable housing need to be revised and incentives need to be in place. The City and County already have developer incentives in place and the County recently proposed additional

incentives to encourage the development of affordable housing, however, additional outreach and education for developers is essential for any incentive to be effective.

The City and the County continuing to support affordable housing projects with HOME, CDBG, and SHIP funding will help to overcome barriers to affordable housing impeded by the abundance of deteriorated or abandoned units. Projects will include the rehabilitation and/or replacement of substandard housing in R/ECAPs to improve the quality of the existing affordable housing stock. In regard to financial assistance for new housing construction, the City and County should give a higher priority to projects located in high-opportunity areas.

2	Increase homeownership opportunities for low-and moderate-income persons and protected class members	Availability of affordable units in a range of sizes Location and type of affordable housing Income and education disparities	Segregation/Integration R/ECAPs Disparities in Opportunity Disproportionate Housing Needs Publicly Supported Housing	PY 2018-2022	City of Gainesville Alachua County GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, provide financial assistance to non-profit / for-profit developers for the creation or preservation of affordable homeownership units in disadvantaged communities to stabilize these neighborhoods.
- Within 5 years, continue to provide funding for or support public services including homebuyer education, financial literacy, and foreclosure prevention counseling and financial assistance.

Discussion:

The homeownership rate in the City of Gainesville is 37.7% compared to 54.8% in the region. Preserving and increasing homeownership for low- and moderate-income persons, minorities, and persons with disabilities helps to stabilize neighborhoods and increase quality of life through wealth building. To increase homeownership and overcome related contributing factors, the City will continue to support and encourage affordable homeownership units in R/ECAPs and gentrifying neighborhoods. Both the City and County will continue to provide homeownership counseling, foreclosure prevention counseling, and credit and financial literary programs. The City and the County also will continue to provide direct financial assistance to homebuyers to subsidize the cost of housing and reduce disproportionate housing needs.

3	Increase public investment and encourage private investment in East Gainesville to address disparities in housing, proficient schools, employment opportunities, services, and public facilities and infrastructure	<p>Lack of private investment in specific neighborhoods</p> <p>Lack of public investment in specific neighborhoods</p> <p>Lack of community revitalization strategies</p> <p>Location of proficient schools</p> <p>Location of employers</p>	<p>Segregation/Integration</p> <p>R/ECAPs</p> <p>Disparities in Opportunity</p> <p>Disproportionate Housing Needs</p> <p>Publicly Supported Housing</p>	PY 2018-2022	<p>City of Gainesville</p> <p>Alachua County</p> <p>GHA</p> <p>ACHA</p>
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Metrics/Milestones/Recommendations:

- Within 1 year, establish a Task Force to improve coordination among and between government agencies. The purpose of the Task Force will be to increase investment and reduce disparities in access to opportunity in East Gainesville. At a minimum, the Task Force will invite representatives from the Alachua County School District, the Chamber of Commerce, the University of Florida, Santa Fe College, the Gainesville Housing Authority, the Alachua County Housing Authority, Alachua County (Growth Management and Housing) and the City of Gainesville (Doing, Community Redevelopment Agency, Regional Transit System, Gainesville Regional Utilities, Economic Development, Neighborhood Improvement, and Parks, Recreation and Cultural Affairs).
- Within 2 years, adopt a strategic revitalization plan in partnership with organizations and individuals that have a common goal of increasing opportunities and fair housing choice in East Gainesville and that will leverage private and public investments in a targeted manner.
- Within 5 years, study the feasibility of economic and other incentives for housing developers, businesses, and other interested entities to assist in the redevelopment of East Gainesville.
- Within 5 years, develop a marketing campaign to attract businesses to East Gainesville.
- Within 2 years, implement quarterly meetings between local government and the School Board to enhance agency coordination and encourage cooperation in managing growth in West Gainesville schools and disinvestment in East Gainesville Schools.

Discussion:

There is a lack of public and private investment in East Gainesville that is perpetuating disparities in access to opportunity, disproportionate housing needs, and other fair housing issues. While both private and public investment has been occurring, there is a lack of coordination and a disjointed revitalization approach. The establishment of a Task Force to improve coordination, and the development of a strategic revitalization plan for neighborhoods most in need, may help address the lack of public and private investment. The strategic revitalization plan may improve conditions and eliminate disparities in access to opportunity between residents of those neighborhoods and the rest of the jurisdiction and region. The plan should include realistic strategies and proposed funding sources for housing rehabilitation and/or construction, economic development and investment in businesses, public transit, educational opportunities, access to jobs, public infrastructure and facilities, schools, and addressing disparities in the provision of municipal services.

4	Increase access / reliability of public transportation for low- and moderate-income persons and persons with disabilities	Availability, type, frequency, and reliability of public transportation Availability, type, frequency, and reliability of public transportation for persons with disabilities	Disparities in Access to Opportunity Disability and Access	PY 2018-2022	City of Gainesville Alachua County
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Metrics/Milestones/Recommendations:

- Within 1 year, establish a committee to explore, research, and discuss ways to increase coordination between RTS, local government departments, and non-profits serving low-income residents and persons with disabilities.
- Within 3 years, initiate a study to determine the costs and benefits of using federal funding, such as CDBG public service funds, to subsidize transportation costs for low-income residents and persons with disabilities and determine feasibility for the City of Gainesville.
- Within 5 years, seek additional state or federal funding, specifically for Alachua County, to provide subsidies for a public transportation voucher program, gas voucher program, or taxi/Uber/Lyft voucher program for Alachua County residents.

Discussion:

There is a lack of frequent and reliable public transportation in most areas of Alachua County, including areas to the East of Gainesville where many low-income and protected class residents live. Further exacerbating the challenges of relying on public transportation for daily use, areas in Northwest and West Gainesville, and in the County just outside the City boundary, are areas with the highest number of job opportunities. This relationship between strong job

centers to the West with a disproportionate concentration of protected class members in East Gainesville and East Alachua County places an undue burden on protected classes

Further, access to transportation continues to be a greater barrier for persons with disabilities. The Regional Transit System is largely driven by the student population in the City of Gainesville. The focus of public transportation in the university area has a direct relationship with the funding character of RTS and as a result, bus routes and schedules gear towards serving students of the local colleges and universities, specifically the University of Florida. The Regional Transit System does offer ADA complementary para-transit service which provides door-to-door service to para-transit certified people on an appointment basis, however, service after 9:00 pm is restricted to within 3/4 of a mile from certain routes. Also, reservations have to be made in advance as same day reservations generally cannot be accommodated and bus service in Alachua County is unavailable, limiting access to essential services, healthcare, and educational or employment opportunities.

Though service providers try to supplement transportation services to assist in meeting the needs of persons with disabilities, supplemental transportation is limited and public transportation does not sufficiently serve this population. Increasing coordination between local government departments, non-profit organizations serving these populations, and RTS will assist in overcoming the related contributing factors. To further eliminate transportation barriers, consideration of subsidy programs is essential.

Because of the growth in West Gainesville and limited transportation options within the County, it is important that developers consult with RTS during the planning process. Coordination between developers and RTS will help manage growth patterns and will open the discussion for extending public transportation further into the County.

5	Increase educational attainment and employment opportunities, specifically in East Gainesville	Income and education disparities	Segregation R/ECAPs Disparities in Access to Opportunity	PY 2018-2022	City of Gainesville GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, identify partners, programs and unmet needs to improve job opportunities through increased education and training programs.
- Within 5 years, support public service programs that provide childcare, short term assistance, financial counseling, credit repair and other services that improve self-sufficiency.
- Within 5 years, identify economic development projects designed to attract higher-skilled jobs to East Gainesville to increase wages.

Discussion:

One of the reasons for the segregation that is occurring in Gainesville is disparities in income and education level for minorities and persons with protected characteristics. In order to reduce these disparities and to foster more inclusive communities, the City, GHA, and ACHA will support job training and additional self-sufficiency programs that serve residents in R/ECAPs and for public housing residents. Further, supporting programs and services that lead to job stability and the potential to increase earnings and improve living conditions will assist in overcoming related contributing factors.

6	Enhance outreach and education regarding affordable housing development	Community opposition	Publicly Supported Housing	PY 2018-2022	City of Gainesville Alachua County GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 2 years, meet with neighborhood associations, civic groups, media, and professional associations, and hold resident meetings to share information about the importance of affordable and mixed income housing; to share information about public and private programs to preserve and increase affordable and mixed income housing; and to address legitimate concerns regarding affordable housing development.
- Within 2 years, develop handouts containing information discussing the benefits of affordable and mixed income housing; and public and private programs to preserve and increase affordable and mixed income housing.

Discussion:

Community opposition is a barrier to increasing affordable housing and developing publicly supported housing in the region. The Not In My Back Yard Syndrome (NIMBY) continues to perpetuate segregation through the objection to developing affordable housing in specific areas of the community. This is of particular concern for the public housing authorities. The Gainesville Housing Authority and the Alachua County Housing Authority are both met with opposition from the community. There is a stereotype associated with public housing residents and Housing Choice Voucher participants that is hard to overcome.

For many reasons, affordable housing is beneficial to the overall health of a community; therefore, having residents and elected officials with a strong knowledge of the Fair Housing Act and the importance of affordable housing is important. Establishing an affordable housing information group and increasing outreach and education throughout the region will assist in overcoming related contributing factors and will ultimately create a discussion around affordable housing that many residents would otherwise avoid.

7	Increase landlord participation in affordable housing programs	Loss of affordable housing	Publicly Supported Housing	PY 2018-2022	GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 1 year, set-up a hotline for landlords to call to report issues with renters.
- Within 1 year, provide incentives to landlords including:
 - Tax incentives to landlords who rent to voucher holders;
 - One-time signing bonus to landlords;
 - Fast track inspections;
 - Allow paying rent by electronic deposit.

Discussion:

Housing Choice Vouchers is the predominant program utilized across all publicly supported housing categories with GHA having 1,579 vouchers and ACHA having 920. The HCV program is in high demand because of its nature in allowing renters to choose their housing location, often allowing low-income persons to reside in areas of opportunity. Though the demand for vouchers is high, landlord participation is low, which leads to the same cycle of segregation and often forces low-income renters to live in unsafe or hazardous conditions.

Lack of landlord participation is increasingly becoming a significant barrier to affordable housing. Alachua County is specifically experiencing a loss of landlords participating in publicly supported housing programs due to issues with tenants such as substance abuse, drug usage, buying and selling of drugs, and damage to units. Creating a better relationship with landlords and helping to reassure them of the benefits of participation is critical to maintaining affordable housing. Providing incentives will assist in overcoming contributing factors related to the loss of landlord participation.

8	Increase the availability of publicly supported housing for the elderly and persons with disabilities.	Lack of affordable, accessible housing in a range of unit sizes Lack of affordable, integrated housing for individuals who need supportive services	Publicly Supported Housing Disability and Access	PY 2018-2022	GHA ACHA
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Metrics/Milestones/Recommendations:

- Within 5 years, designate a percentage of public housing units for the elderly.
- Within 5 years, designate a percentage of Housing Choice Vouchers for use by the elderly.
- Within 5 years, designate a percentage of scattered site/integrated public housing units for persons with disabilities.
- Within 5 years, designate a percentage of Housing Choice Vouchers for persons with disabilities to use for scattered site/integrated housing.
- Within 5 years, evaluate and revise policies that impede access to housing in integrated settings for persons with disabilities.
- Within 5 years, enhance coordination and continue to provide financial support to non-profit organizations developing senior housing or integrated housing for persons with disabilities.

Discussion:

For all publicly supported housing in the jurisdiction and region, 18.43% of public housing units are elderly households, 27% of Project-Based Section 8 are elderly households, 16% are elderly households utilizing the HCV Program, and there are no reported elderly households in other multi-family housing units. Persons with disabilities residing in publicly supported housing in the jurisdiction represent 26.59% of public housing units, 21.60% of Project-Based Section 8 units, 82.61% of other multi-family units, and 24.63% of HCV Program units.

The GHA is seeking to designate 171 low-income public housing units in its Oak Park and Sunshine Park Developments as senior only and apply for 40 additional vouchers to meet the needs of the disabled population. The ACHA is considering plans to convert its 34 unit public housing at Rocky Point to senior housing. Currently, ACHA does not have any publicly supported housing designated for the elderly or persons with disabilities. The application process for publicly supported housing is open to the general population, meaning that units may occupy elderly or persons with disabilities. Currently ACHA's publicly supported housing units are occupied 187 elderly and 735 persons with disabilities.

The Analysis determined that despite efforts, there is a lack of available publicly supported housing units for the elderly and persons with disabilities. GHA and ACHA designating housing units for the elderly and persons with disabilities will ensure an increase in affordable accessible publicly supported housing available in a range of sizes. In addition, designating scattered site units and Housing Choice Vouchers for persons with disabilities, allows for increased choice

in housing location and supports housing integration for persons with disabilities. Implementing these metrics will assist in overcoming related contributing factors.

9	Increase fair housing resources and agency participation in fair housing activities	Lack of resources for Fair Housing agencies and organizations	Fair Housing Enforcement, Outreach Capacity, and Resources	PY 2018-2022	City of Gainesville Alachua County
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Metrics/Milestones/Recommendations:

- Within 2 years, seek additional funding from state or federal resources for non-profits and housing providers so that these organizations can increase engagement in fair housing outreach, education, and enforcement.
- Within 5 years, provide direct financial assistance to non-profit organizations to provide fair housing services.

Discussion:

There are only a few local and regional agencies/organizations that provide fair housing information, outreach, and enforcement in the Gainesville or Alachua County area including:

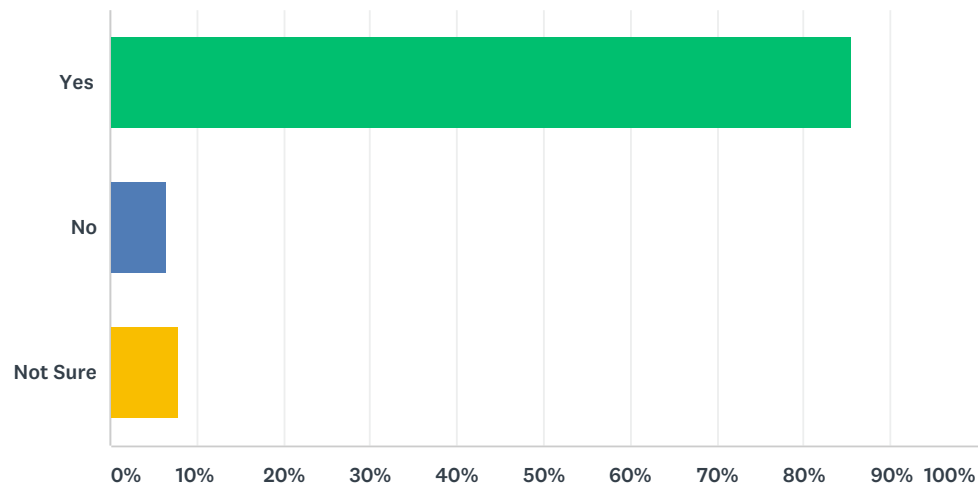
- Alachua County Equal Opportunity Office. Funded through County general revenue, with 4.75 full-time employees.
- City of Gainesville Office of Equal Opportunity. Funded through City general revenue.
- Three Rivers Legal Services. Principally funded through the Legal Services Corporation (LSC). No HUD funding.

Many agencies that have the capacity to provide fair housing services are non-profit organizations operating on a limited budget. The lack of funding and lack of resources to provide additional services impedes fair housing in the area. Seeking additional resources, and local government providing direct financial assistance through their federal grant programs, will allow more organizations to get involved in fair housing activities, outreach, and enforcement and will assist in overcoming related contributing factors.

Resident Survey Results Summary

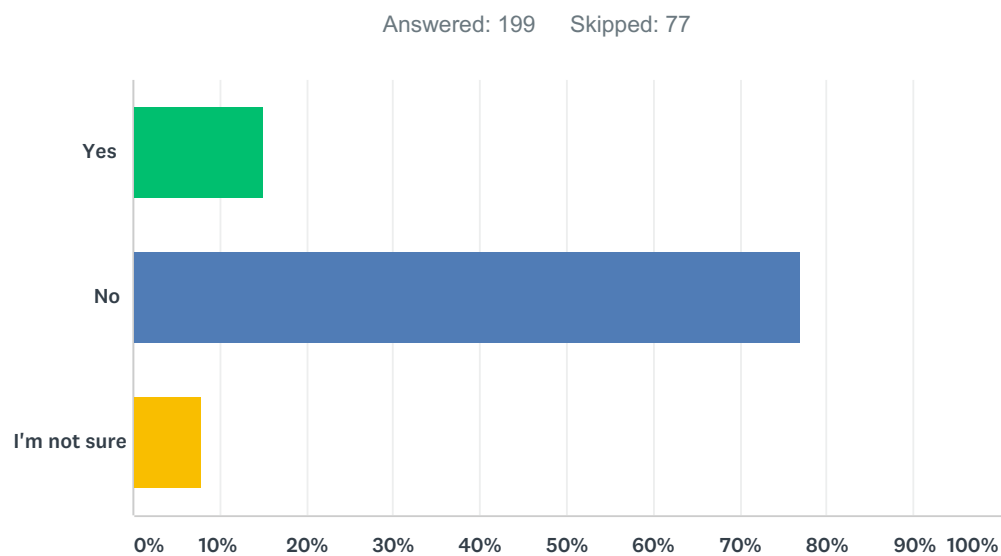
Q2 NOTE: Your fair housing rights are your rights to live where you choose without facing discrimination because of your race, color, religion, national origin, sex, sexual orientation, gender identity and expression, age, disability, familial status or marital status. Every citizen has the right to equal access to all neighborhoods of their choice for decent and affordable housing. It is illegal to discriminate against any person: In the sale or rental of housing or residential lots;In advertising the sale or rental of housing;In the financing of housing; orIn the provision of real estate brokerage services.Question: Do you feel you understand your Fair Housing rights?

Answered: 200 Skipped: 76



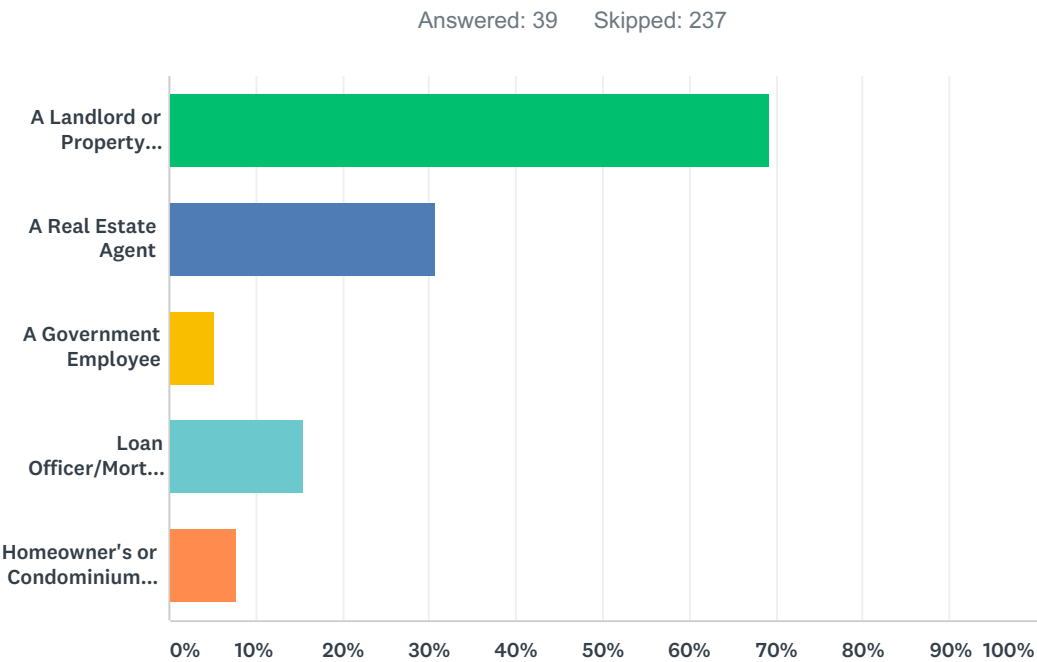
ANSWER CHOICES	RESPONSES	
Yes	85.50%	171
No	6.50%	13
Not Sure	8.00%	16
TOTAL		200

Q3 Since living in Gainesville/Alachua County, have you experienced housing discrimination? NOTE: The following actions would represent housing discrimination if based on your race, color, national origin, religion, sex, familial status, disability, age, sexual orientation, gender identity or expression: Refusal to rent, sell or negotiate the rental/sale of housing; Falsely denying that housing is available for inspection, sale or rental; Setting different rental terms, conditions, or privileges for sale or rental of a dwelling; or Providing different housing services or facilities.



ANSWER CHOICES		RESPONSES	
Yes		15.08%	30
No		76.88%	153
I'm not sure		8.04%	16
TOTAL			199

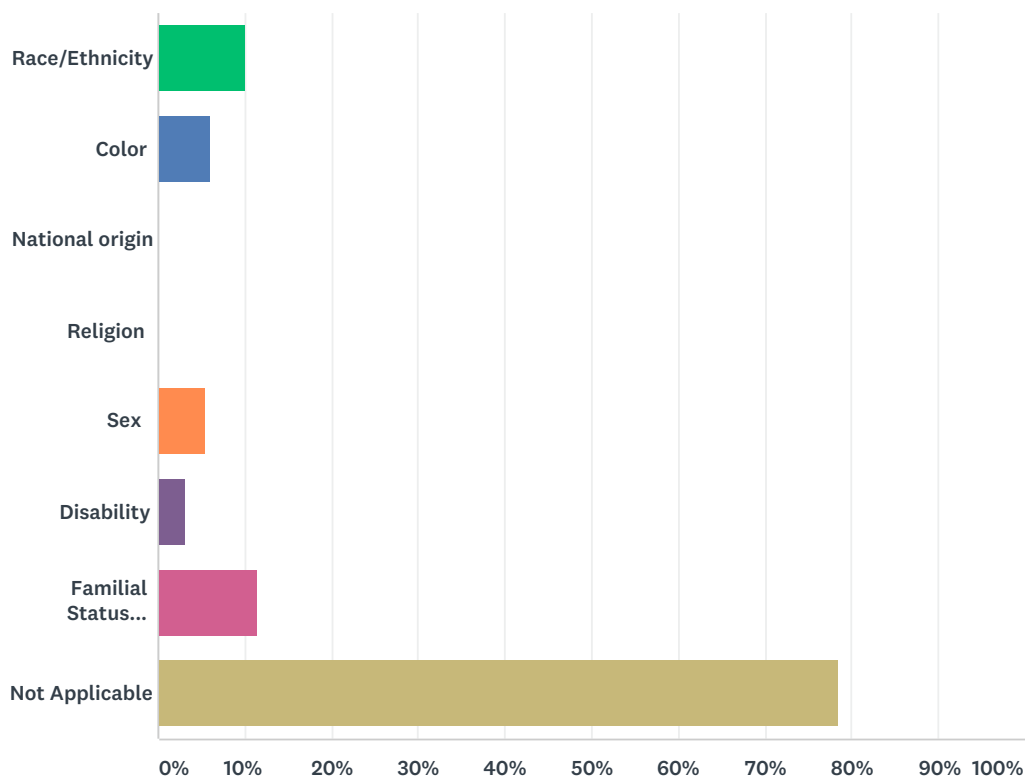
Q4 Which of the following best describes the person or organization that discriminated against you? (Check all that apply)



ANSWER CHOICES		RESPONSES	
A Landlord or Property Manager		69.23%	27
A Real Estate Agent		30.77%	12
A Government Employee		5.13%	2
Loan Officer/Mortgage Broker		15.38%	6
Homeowner's or Condominium Association		7.69%	3
Total Respondents: 39			

Q5 On what basis do you believe you were discriminated against? (Check all that apply)

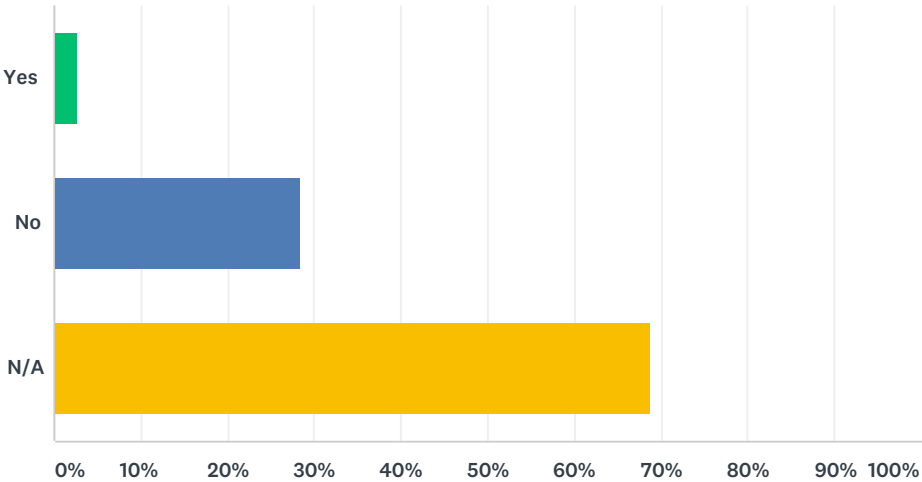
Answered: 130 Skipped: 146



ANSWER CHOICES	RESPONSES	
Race/Ethnicity	10.00%	13
Color	6.15%	8
National origin	0.00%	0
Religion	0.00%	0
Sex	5.38%	7
Disability	3.08%	4
Familial Status (example: family with children, single parent, expecting a child)	11.54%	15
Not Applicable	78.46%	102
Total Respondents: 130		

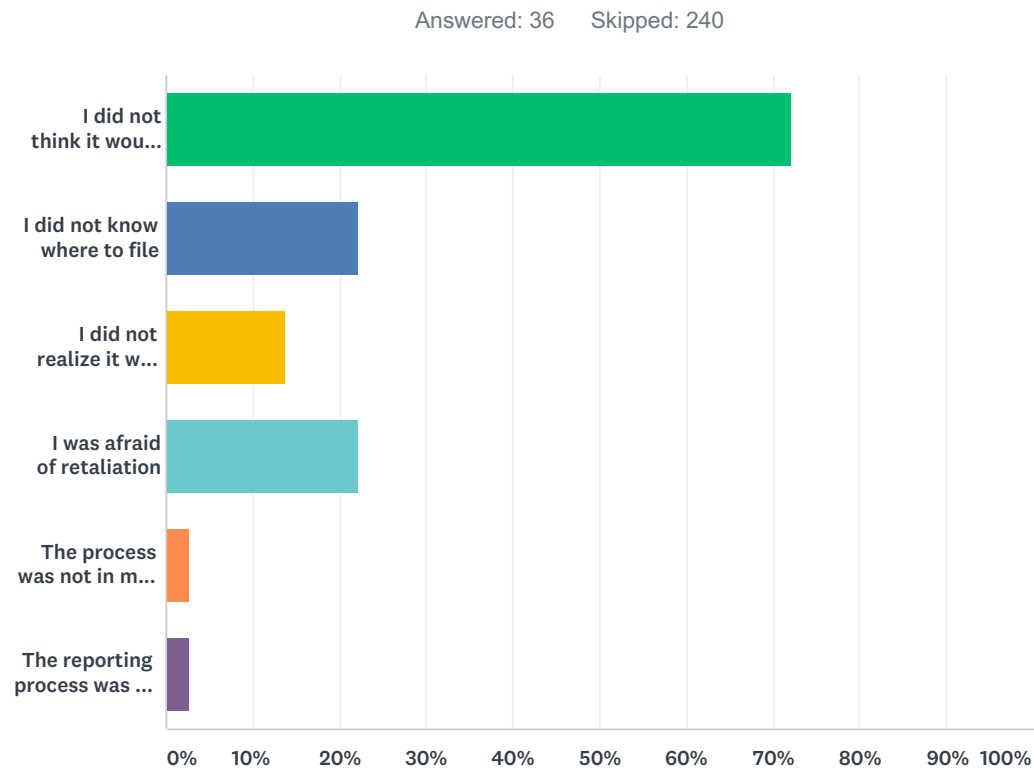
Q6 Did you file a report of that discrimination?

Answered: 148 Skipped: 128



ANSWER CHOICES	RESPONSES	
Yes	2.70%	4
No	28.38%	42
N/A	68.92%	102
TOTAL		148

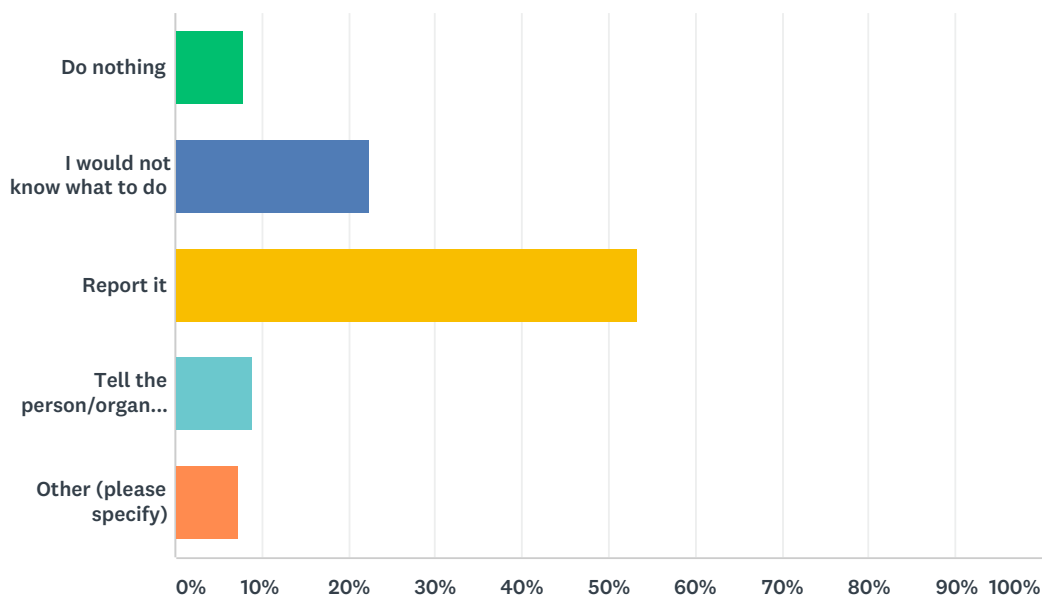
Q7 If you did not file a report, why not?



ANSWER CHOICES	RESPONSES	
I did not think it would help	72.22%	26
I did not know where to file	22.22%	8
I did not realize it was a violation of the law	13.89%	5
I was afraid of retaliation	22.22%	8
The process was not in my native language	2.78%	1
The reporting process was not accessible to me because of a disability	2.78%	1
Total Respondents: 36		

Q8 What would you do if you were discriminated against in a housing choice?

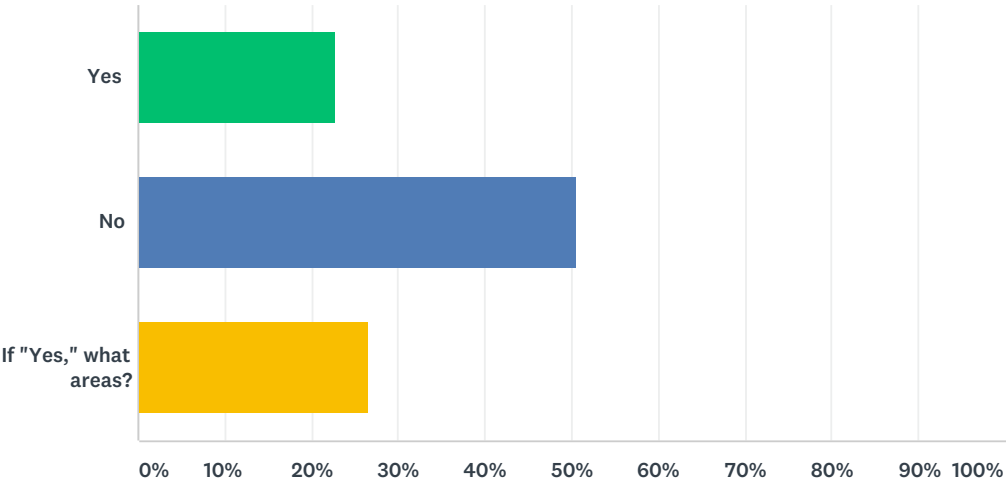
Answered: 165 Skipped: 111



ANSWER CHOICES	RESPONSES	
Do nothing	7.88%	13
I would not know what to do	22.42%	37
Report it	53.33%	88
Tell the person/organization that discriminated against you	9.09%	15
Other (please specify)	7.27%	12
TOTAL		165

Q9 Do you feel your housing choices are limited to certain geographic areas or neighborhoods?

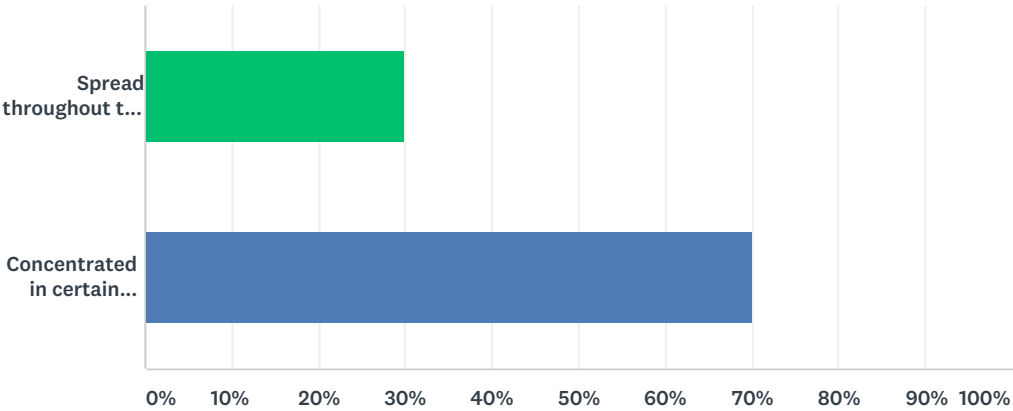
Answered: 154 Skipped: 122



ANSWER CHOICES		RESPONSES	
Yes		22.73%	35
No		50.65%	78
If "Yes," what areas?		26.62%	41
TOTAL			154

Q10 Do you think that affordable housing options are located throughout the Gainesville/Alachua County region, or are they concentrated in certain areas/neighborhoods?

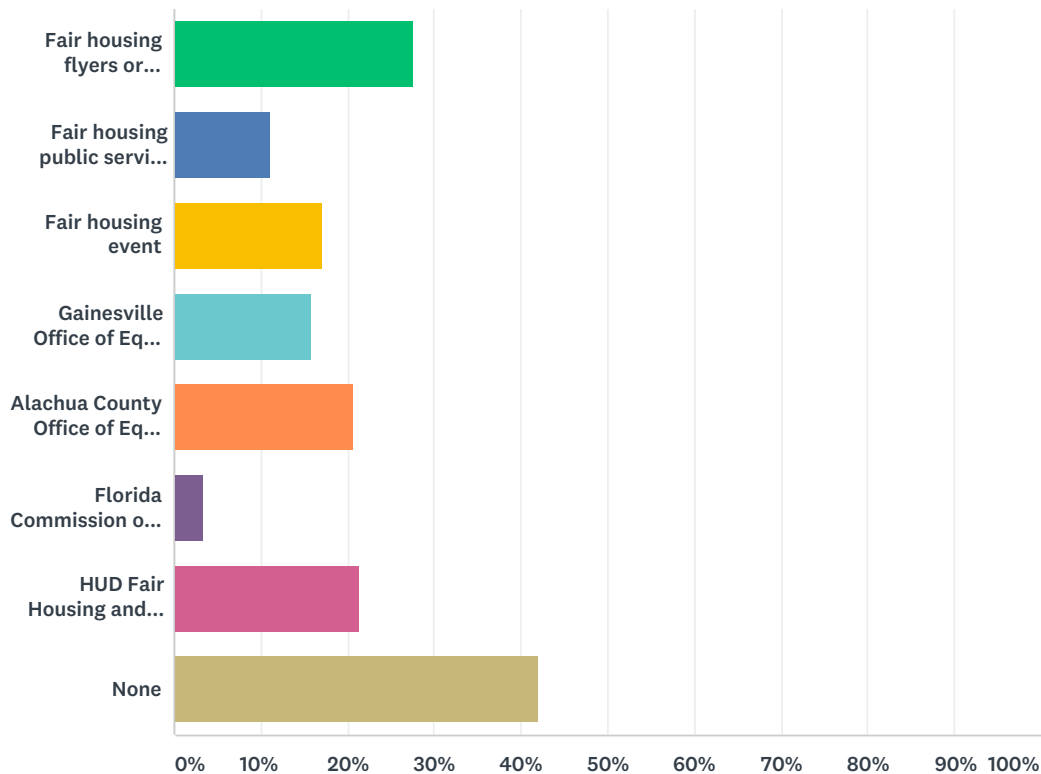
Answered: 150 Skipped: 126



ANSWER CHOICES	RESPONSES	
Spread throughout the region	30.00%	45
Concentrated in certain areas/neighborhoods	70.00%	105
TOTAL		150

Q11 What information have you seen or heard regarding fair housing programs, laws, or enforcement in the City/County?

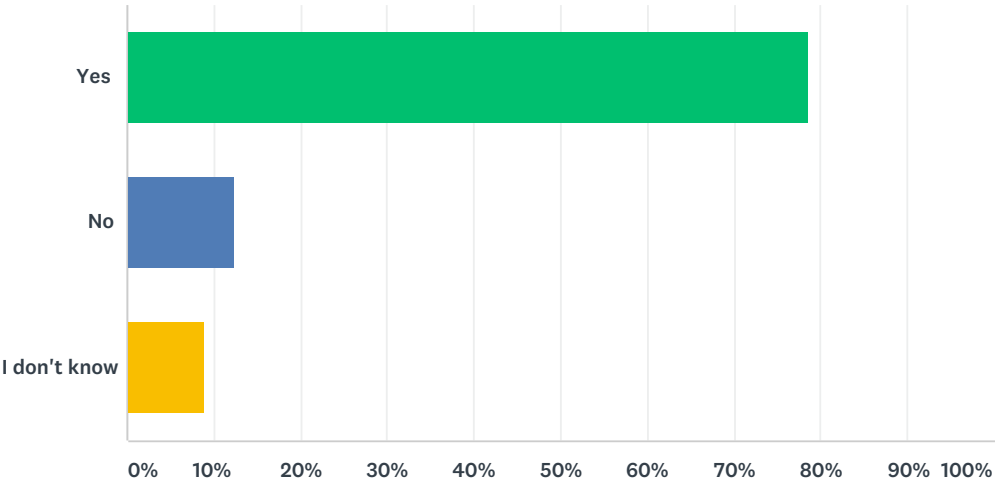
Answered: 145 Skipped: 131



ANSWER CHOICES	RESPONSES	
Fair housing flyers or pamphlets	27.59%	40
Fair housing public service announcement (radio or television)	11.03%	16
Fair housing event	17.24%	25
Gainesville Office of Equal Opportunity website	15.86%	23
Alachua County Office of Equal Opportunity website	20.69%	30
Florida Commission on Human Relations website	3.45%	5
HUD Fair Housing and Equal Opportunity website	21.38%	31
None	42.07%	61
Total Respondents: 145		

Q12 Do you think that certain geographic areas or neighborhoods in the City/County are undesirable places to live?

Answered: 154 Skipped: 122



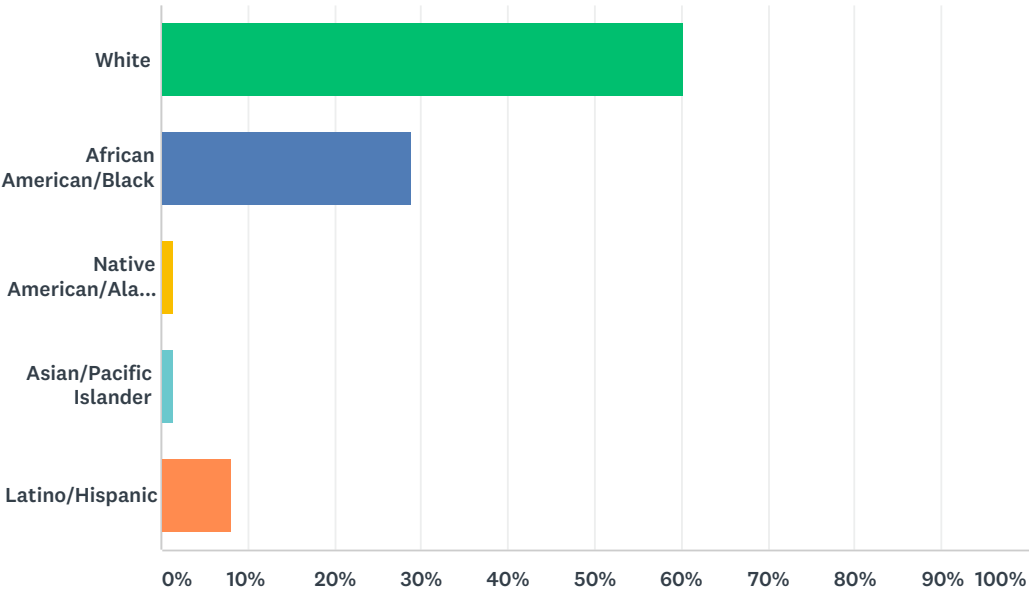
ANSWER CHOICES		RESPONSES	
Yes		78.57%	121
No		12.34%	19
I don't know		9.09%	14
TOTAL			154

Q13 Please list below any actions you would suggest that the City of Gainesville or Alachua County take to address barriers to fair housing choice:

Answered: 85 Skipped: 191

Q14 What is your race/ethnicity?

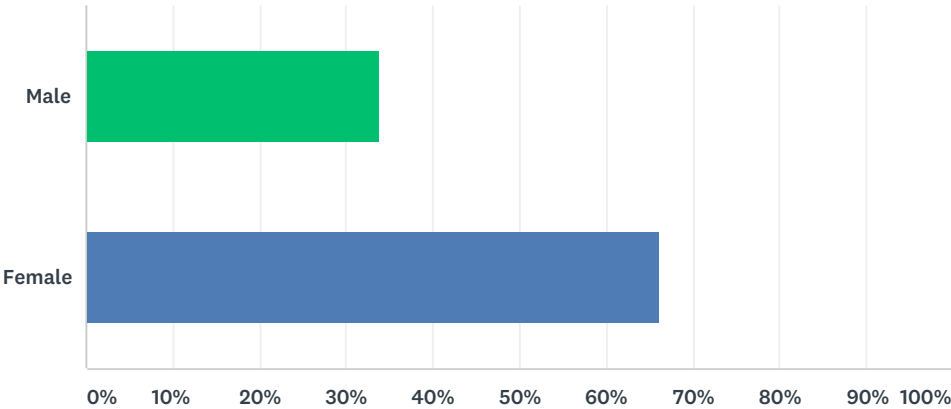
Answered: 146 Skipped: 130



ANSWER CHOICES	RESPONSES	
White	60.27%	88
African American/Black	28.77%	42
Native American/Alaska Native	1.37%	2
Asian/Pacific Islander	1.37%	2
Latino/Hispanic	8.22%	12
TOTAL		146

Q15 What is your gender?

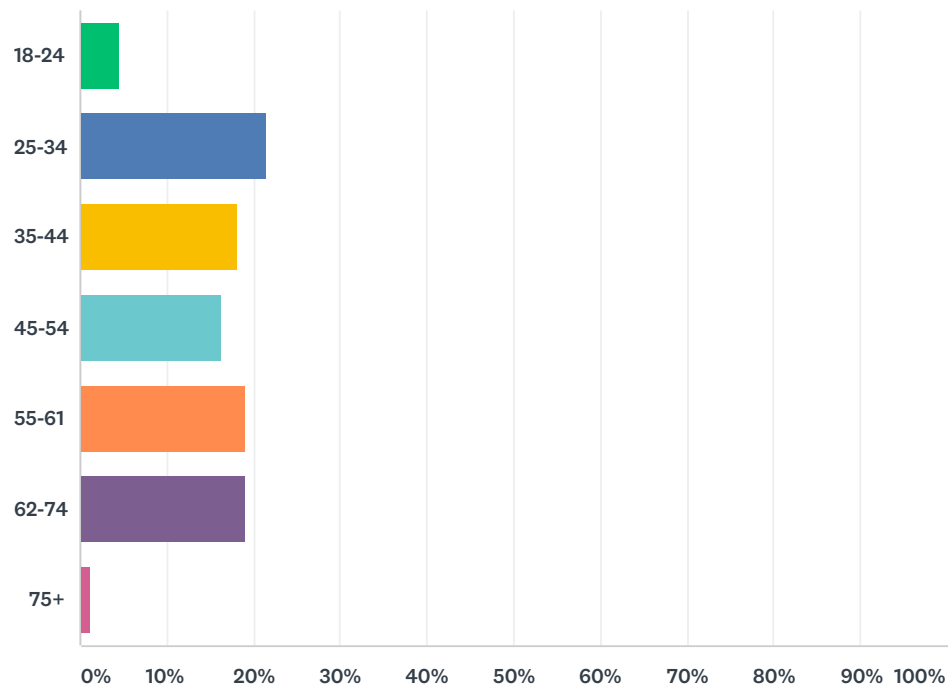
Answered: 153 Skipped: 123



ANSWER CHOICES		RESPONSES	
Male		33.99%	52
Female		66.01%	101
TOTAL			153

Q16 What is your age group?

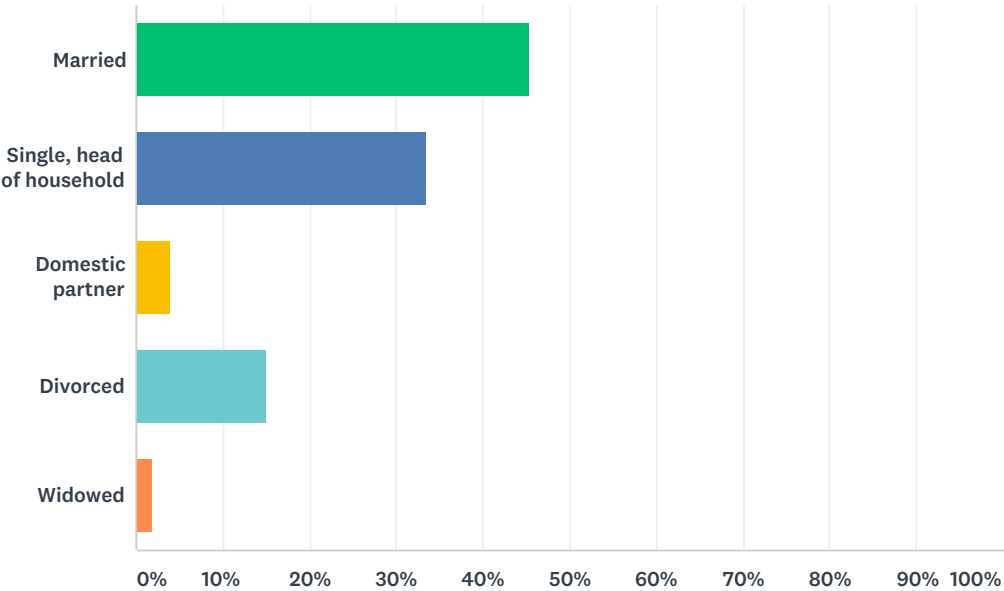
Answered: 153 Skipped: 123



ANSWER CHOICES	RESPONSES	
18-24	4.58%	7
25-34	21.57%	33
35-44	18.30%	28
45-54	16.34%	25
55-61	18.95%	29
62-74	18.95%	29
75+	1.31%	2
TOTAL		153

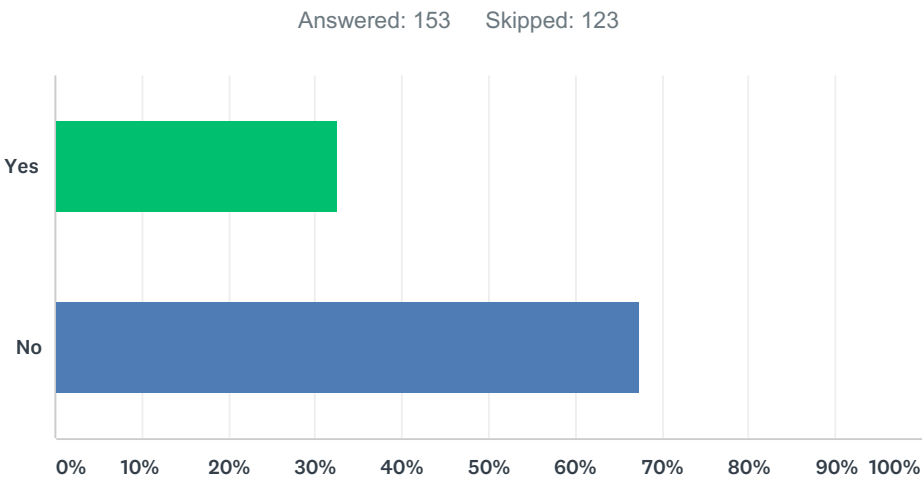
Q17 What is your marital status?

Answered: 152 Skipped: 124



ANSWER CHOICES	RESPONSES	
Married	45.39%	69
Single, head of household	33.55%	51
Domestic partner	3.95%	6
Divorced	15.13%	23
Widowed	1.97%	3
TOTAL		152

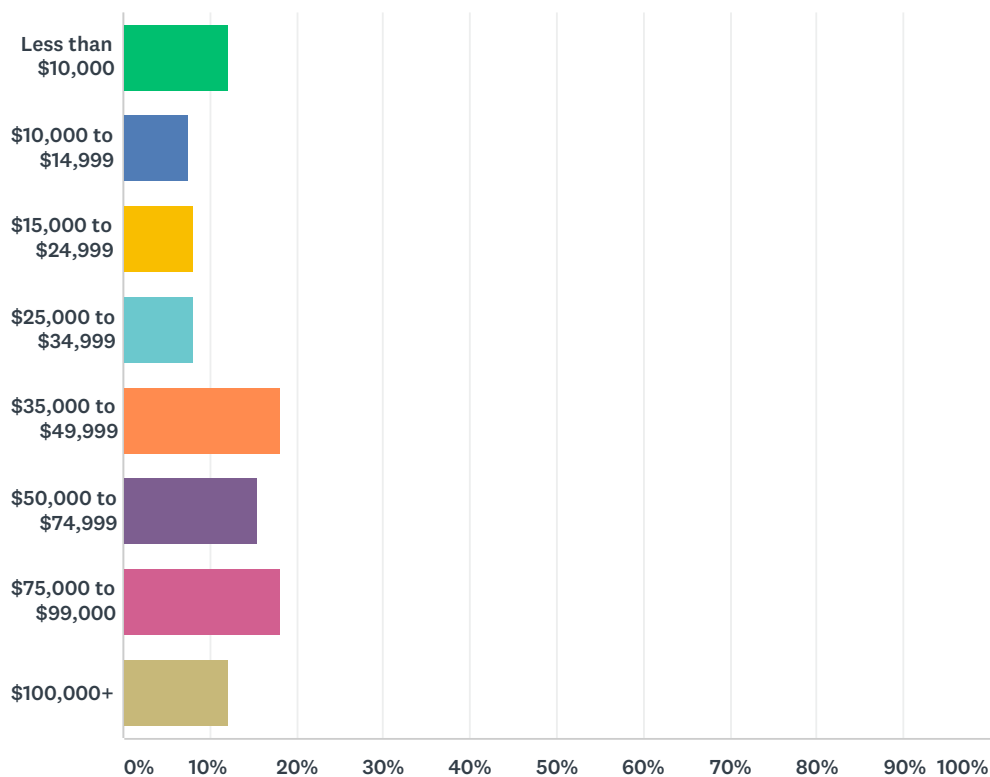
Q18 Do you have children under the age of 18 years in your household?



ANSWER CHOICES		RESPONSES	
Yes		32.68%	50
No		67.32%	103
TOTAL			153

Q19 What is your annual household income?

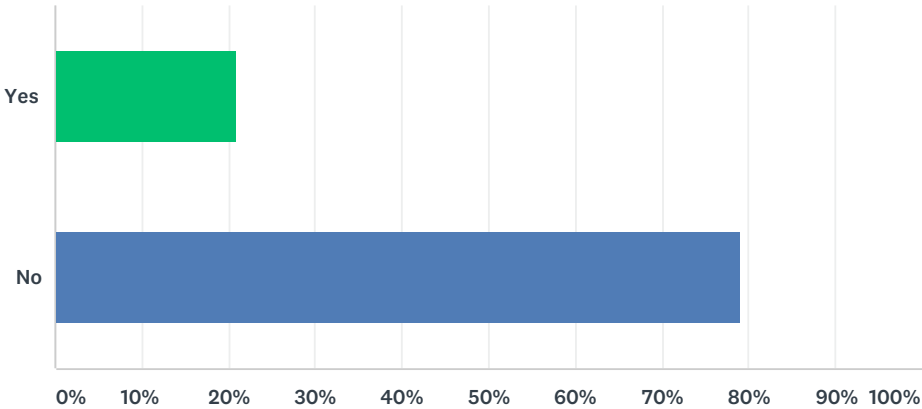
Answered: 148 Skipped: 128



ANSWER CHOICES	RESPONSES	
Less than \$10,000	12.16%	18
\$10,000 to \$14,999	7.43%	11
\$15,000 to \$24,999	8.11%	12
\$25,000 to \$34,999	8.11%	12
\$35,000 to \$49,999	18.24%	27
\$50,000 to \$74,999	15.54%	23
\$75,000 to \$99,000	18.24%	27
\$100,000+	12.16%	18
TOTAL		148

Q20 Is anyone in your household disabled?

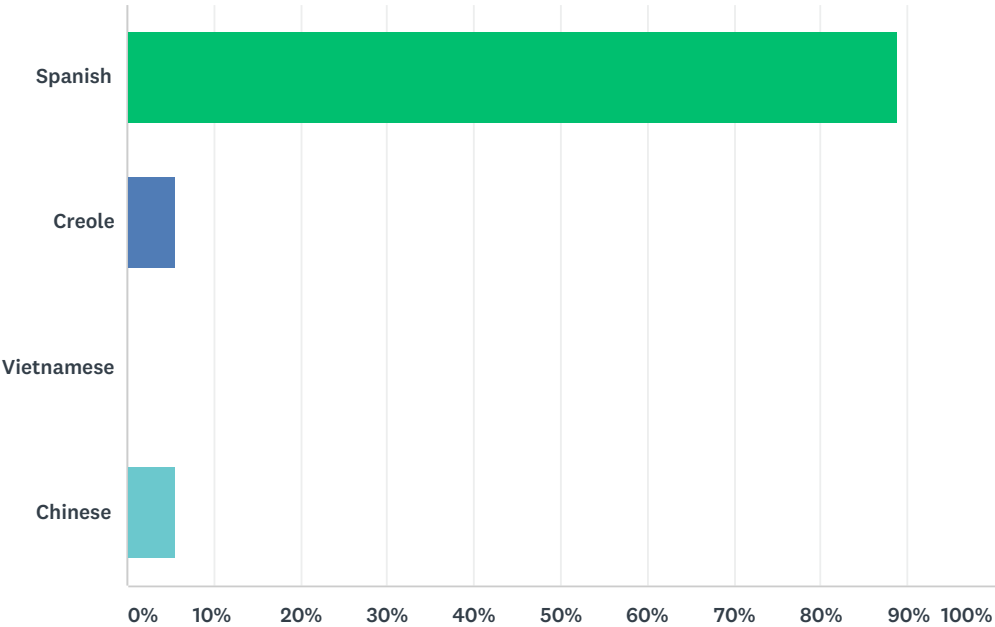
Answered: 153 Skipped: 123



ANSWER CHOICES		RESPONSES	
Yes		20.92%	32
No		79.08%	121
TOTAL			153

Q21 Are languages other than English spoken in your household?
(please check all that apply)

Answered: 18 Skipped: 258



ANSWER CHOICES	RESPONSES	
Spanish	88.89%	16
Creole	5.56%	1
Vietnamese	0.00%	0
Chinese	5.56%	1
Total Respondents: 18		