ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Thomas Jefferson Region, Virginia
City of Charlottesville
Albemarle County
Nelson County
Fluvanna County
Greene County
Louisa County

For City Council Adoption 03-04-19
City of Charlottesville
Thomas Jefferson Planning District Commission
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A. Introduction

i. Analysis of Impediments to Fair Housing Choice
The Housing and Community Development Act of 1974, as amended, requires that any jurisdiction receiving Community Development Block Grant (CDBG) or HOME program funds affirmatively furthers fair housing. The City of Charlottesville and the Thomas Jefferson Planning District Commission (TJPDC) have jointly prepared this Analysis of Impediments to Fair Housing Choice (AI) to satisfy requirements of the Act.

ii. Entitlement Areas
The U.S. Department of Housing and Urban Development (HUD) requires an Analysis of Impediments to Fair Housing Choice (AI) from all recipients of HOME and Community Development Block Grant (CDBG) funds. The member governments of the Thomas Jefferson region entered into an agreement to participate in the HOME Program as a Consortium, and therefore receive annual entitlement HOME funds available on an equal share basis to each participating government. The City of Charlottesville is the official grantee for the HOME Consortium and the TJPDC is designated Program Manager for the Consortium. The City of Charlottesville is a CDBG entitlement community and receives annual CDBG funds to be used within the City.

iii. Lead Agency
The City of Charlottesville and the TJPDC is the lead agency responsible for the preparation and implementation of the AI.

iv. Purpose
The purpose of this analysis is to identify, and make recommendations to eliminate, any impediments that currently exist in the Thomas Jefferson region (City of Charlottesville, Albemarle County, Fluvanna County, Louisa County, Greene County, and Nelson County) to the fair housing choices made by all residents. The analysis is an important part of the HOME Consortium’s and the City of Charlottesville’s commitment to affirmatively further fair housing, and it will serve to guide activities relating to fair housing for the next several years until the Affirmatively Furthering Fair Housing Choice (AFFH) is due in 2022. According to the Fair Housing Planning guide issued by the U.S. Department of Housing and Urban Development (HUD), this purpose includes:

- A review of a city’s or county’s laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, policies, and practices affect the location, availability, and accessibility of housing; and
- An assessment of public and private-sector conditions affecting fair housing choice.

Impediments to fair housing choice are defined by HUD as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions that have this effect.
Protected Classes listed under the federal Fair Housing Act include:

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status (families with children under 18)
- Handicap/Disability Status

In addition to the “protected classes” listed under the federal Fair Housing Act, the Commonwealth of Virginia Fair Housing Act includes elderliness, as defined as any person over the age of 55. Each of the classes included under federal and state fair housing law are not special interests, but rather characteristics of all people of which discrimination in the real estate or rental housing market is prohibited. This analysis not only evaluates actual or potential housing discrimination in the region, but also, more broadly, any actions or omissions that are counterproductive to fair housing choice.

v. Methodology

The document provides a demographic overview of the fair housing profile, an evaluation of policies, and an assessment of Fair Housing policy, programs and activities. The document ends with an outline of conclusions, potential impediments, and activities to address the same.

A comprehensive approach was used to prepare this AI. The following sources were utilized:

- The most recently available demographic data regarding population, housing, household income, and employment
- The 2013 – 2017 Consolidated Plan
- The 2011 Analysis of Impediments to Fair Housing Choice for the City of Charlottesville and the Thomas Jefferson HOME Consortium
- Fair housing complaints filed with HUD and the Virginia Department of Professional and Occupational Regulation (DPOR)
- Municipal zoning ordinances
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- U.S. Census Bureau
- U.S. Bureau of Labor Statistics
- Virginia Employment Commission
- RealtyTrac Inc.
- Weldon Cooper Center for Public Service (University of Virginia)
- Charlottesville/Albemarle Association of Realtors (CAAR)
- Blue Ridge Apartment Council
- Virginia Department of Education
• Thomas Jefferson Area Coalition for the Homeless (TJACH)
• Previous Consolidated Annual Performance Reports (CAPER)
• City of Charlottesville Housing Needs Assessment
• 2018 2022 Consolidated Plan and Fair Housing Survey
• Interviews and focus group sessions conducted with agencies and organizations that provide services to or represent members of protected classes.

Efforts have been made to include a broad cross-section of perspectives from the public throughout the course of the update. The initiation of the public participation process was announced on the TJPDC and City’s website, a variety of newsletters, and through a number of committees with an interest in housing issues, along with a means for submitting input for the analysis. A series of input sessions were held in winter and spring 2018 to directly solicit feedback from groups that represent protected classes or have unique expertise that could inform the analysis:

1. **January 9: Legal Aid Justice Center** – an organization that provides legal representation for low-income individuals.
2. **January 16: Housing Director's Council** – a regional organization that includes representatives from all HOME sub-recipients, with regular participation from the Jefferson Area Board for Aging (JABA). The Housing Directors collaborate on housing related issues and coordinate monthly meetings.
3. **January 17: Housing Advisory Committee (HAC)** – a group of stakeholders that provide City Council with recommendations regarding housing policy and affordable housing funding priorities.
4. **January 23: Rose Hill Neighborhood Association** - a group of residents or property owners who advocate for or organize activities within the Rose Hill neighborhood.
5. **February 6: Thomas Jefferson Area Coalition for the Homeless (TJACH) Service Provider Council** – a committee of TJACH’s Board of Directors that provides a forum in which providers share information and address concerns.
6. **February 8: Fifeville Neighborhood Association** – a group of residents or property owners who advocate for or organize activities within the Fifeville neighborhood.
7. **February 12: Public Housing Association of Residents** - a group that serves the interests of public housing residents and Housing Choice Voucher holders in and around Charlottesville.
8. **February 27: City Department of Social Services (DSS)** – an agency of city government which administers federal, state, and local public assistance and social work service programs.
9. **February 28: International Rescue Committee (IRC)** - a national non-profit that helps refugees settle in new countries. The organization has an office in downtown Charlottesville.
10. **April 5: Sin Barreras** – a non-profit that focuses on outreach to the immigrant (primarily Hispanic) community, connecting individuals to services.
11. **April 11: Habitat for Humanity Southwood Community Engagement Office** – a non-profit organization that builds safe, decent, affordable housing that is currently implementing a national model, neighborhood drive redevelopment process at Southwood Mobile Home Park.

12. **April 23: National Association for the Advancement of Colored People (NAACP)** - the Albemarle/Charlottesville chapter of the national civil rights organization advocating for the rights of ethnic minorities.

13. **April 25: City of Charlottesville and Piedmont Housing Alliance (PHA) Fair Housing Event** – an information session for tenants, landlords/property managers, agencies, community organizations, and advocates of housing to learn about tenancy and the Fair Housing Act.

vi. **Organization**

The analysis includes the following main sections:

1. The *Context for Analysis* presents the background data collected and public input gathered that informs the ensuing analysis. Each of the protected classes are included in the data reviewed, along with economic and housing condition data that reveal the availability of housing opportunities to the range of residents in the community. Along with objective material, the section also includes the experience expressed by the public.

2. The *Analysis of Impediments to Fair Housing Choice* is the primary evaluation of the condition of fair housing choice in the region, including a review of fair housing complaints, lending practices, local land use ordinances and policies, and a variety of actions either taken or not taken by members of the community.

3. The *Identification of Impediments to Fair Housing Choice and Recommendations* are the final results of the analysis. Proposed action items are provided to counteract each impediment revealed.

B. **Demographic Profile**

i. **Population Trends**

The racial majority in the Thomas Jefferson region has historically been and continues to be Non-Hispanic Whites, with African Americans constituting the most significant minority. This is also true for each jurisdiction within the region.
Table 1 - Population in Region by Race, 2016

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>White</th>
<th>%</th>
<th>Black</th>
<th>%</th>
<th>Asian</th>
<th>%</th>
<th>Other*</th>
<th>%</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle County</td>
<td>87,681</td>
<td>82.0%</td>
<td>10,554</td>
<td>9.9%</td>
<td>5,449</td>
<td>5.1%</td>
<td>3,194</td>
<td>3.0%</td>
<td>106,878</td>
</tr>
<tr>
<td>Fluvanna County</td>
<td>21,431</td>
<td>81.6%</td>
<td>3,927</td>
<td>14.9%</td>
<td>191</td>
<td>0.7%</td>
<td>722</td>
<td>2.7%</td>
<td>26,271</td>
</tr>
<tr>
<td>Greene County</td>
<td>17,162</td>
<td>88.6%</td>
<td>1,309</td>
<td>6.8%</td>
<td>316</td>
<td>1.6%</td>
<td>584</td>
<td>3.0%</td>
<td>19,371</td>
</tr>
<tr>
<td>Louisa County</td>
<td>28,318</td>
<td>80.4%</td>
<td>5,705</td>
<td>16.2%</td>
<td>215</td>
<td>0.6%</td>
<td>998</td>
<td>2.8%</td>
<td>35,236</td>
</tr>
<tr>
<td>Nelson County</td>
<td>12,592</td>
<td>84.7%</td>
<td>1,800</td>
<td>12.1%</td>
<td>105</td>
<td>0.7%</td>
<td>372</td>
<td>2.5%</td>
<td>14,869</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>32,792</td>
<td>69.9%</td>
<td>8,897</td>
<td>19.0%</td>
<td>3,572</td>
<td>7.6%</td>
<td>1,651</td>
<td>3.5%</td>
<td>46,912</td>
</tr>
<tr>
<td>Region</td>
<td>199,976</td>
<td>80.2%</td>
<td>32,192</td>
<td>12.9%</td>
<td>9,848</td>
<td>3.9%</td>
<td>7341</td>
<td>2.9%</td>
<td>249,357</td>
</tr>
</tbody>
</table>

* Other Race includes American Indian and Alaskan Native, Native Hawaiian and Other Pacific Islander, and Two or More Races

**Data Source:** United States Census Bureau, 2016 Population Estimates

Data formatted and posted at [http://demographics.coopercenter.org](http://demographics.coopercenter.org) by the UVA Weldon Cooper Center Demographics Research Group

Figure 1 – Changes in the Racial and Ethnic Characteristics of the Population, 2010 - 2016

The region is slowly diversifying as it grows in total population. Asian and Hispanic residents are increasing at faster rate than White and Black residents in the region, however, White residents still make up the majority of the population in the region. In 2010, Asian residents made up three percent (8,029) of the population. Over six years, the percentage of Asian residents increased by 23 percent (9,848). Percentages of the Black population has had a stagnant increase by four percent and made up 13 percent of the population. Persons identifying as some other race, including, American Indian and Alaskan Native, Native Hawaiian and Other Pacific Islander, and/or of two or more races has decreased by 31 percent and make up 3 percent of the population.
Table 2 - Hispanic and Non-Hispanic Ethnicity, 2016

<table>
<thead>
<tr>
<th>Locality</th>
<th>Non-Hispanic</th>
<th>%</th>
<th>Hispanic</th>
<th>%</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle</td>
<td>100,814</td>
<td>94.3%</td>
<td>6,064</td>
<td>5.7%</td>
<td>106,878</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>25,369</td>
<td>96.6%</td>
<td>902</td>
<td>3.4%</td>
<td>26,271</td>
</tr>
<tr>
<td>Greene</td>
<td>18,266</td>
<td>94.3%</td>
<td>1,105</td>
<td>5.7%</td>
<td>19,371</td>
</tr>
<tr>
<td>Louisa</td>
<td>34,269</td>
<td>97.3%</td>
<td>967</td>
<td>2.7%</td>
<td>35,236</td>
</tr>
<tr>
<td>Nelson</td>
<td>14,267</td>
<td>96.0%</td>
<td>602</td>
<td>4.0%</td>
<td>14,869</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>44,417</td>
<td>94.7%</td>
<td>2,495</td>
<td>5.3%</td>
<td>46,912</td>
</tr>
<tr>
<td>Region</td>
<td>237,402</td>
<td>95.1%</td>
<td>12,135</td>
<td>4.9%</td>
<td>249,537</td>
</tr>
</tbody>
</table>

Data Source: United States Census Bureau, Census 2010 and 2016 Population Estimates
Data formatted and posted at http://demographics.coopercenter.org by the UVA Weldon Cooper Center Demographics Research Group

Between 2010 and 2016, the Hispanic or Latino population in the region has had a 17 percent population growth rate compared to a six-percent growth rate for Non-Hispanics.

**OBSERVATION:** Minorities have increased from 29.3% to 36.6% of total population since 1990. Black residents remain the largest minority group, comprising 81% of all minorities. However, the fastest-growing segment of minorities is among persons of “some other race,” which grew from 571 persons in 1990 to 4,077 in 2008.

**ii. Areas of Racial and Ethnic Minority Concentration**

**City of Charlottesville**
Racial and ethnic concentrations continue with the African American population representing 49.4 percent of the population in Census Tract 5.01 and 46.8 percent in 4.01. The City’s largest concentrations of Hispanic residents are in Census Tracts 4.02, 5.01 and 6.0 (Refer to Table 3).

According to the Housing Needs Assessment Report completed by Partners for Economic Solutions, in 2017, patterns of cost burdened households by Census Tract (excluding student-dominated tracts: Census Tracts 2.01; 2.02; and 6.0) show clear disparities between majority-minority tracts and those with a high percentage of Caucasian residents. Low-income African American and Hispanic households bear a disproportionate share of the burden of the lack of affordable housing. Census Tracts with a majority of non-white residents have significantly higher shares of households with cost burdens than do majority-white tracts.
There is considerable variation in the percentage of black population across the region, with a low of 16.8% in Greene County to a high of 29.0% in the City of Charlottesville. Locality percentages for Hispanic or Latinos are more closely grouped, ranging from 12.7% in Louisa to 15.7% in Albemarle and Greene. There are only two impacted areas in the region outside of Charlottesville with Hispanic or Latino population concentrations: in Nelson County, adjacent to Amherst and Rockbridge Counties and in Fluvanna, adjacent to Cumberland and Buckingham Counties. Impacted areas with black population concentrations occur in all five counties. In Albemarle, these occur in neighborhoods along Route 29 and at Pantops, as well as the areas including the Town of Scottsville and Esmont. Louisa has two areas: one including the Town of Louisa and a second along I-64 along the border with Goochland County. Fluvanna has two areas of concentration, at Zion Crossroads along I-64 and the area including the Village of Palmyra. Nelson’s two areas occur along the borders abutting Amherst and Buckingham Counties.
Hispanic or Latino Population Concentration in
The Thomas Jefferson Planning District - 2016

Impacted area defined as areas of racial or ethnic minority concentration where the percentage of a specific minority or ethnic group is 10 percent or more than in the City or County containing the area.

Charlottesville: 15.3%
Albemarle: 15.7%
Greene: 15.7%
Louisa: 12.7%
Nelson: 14.0%

Individuals self reporting as Hispanic or Latino as a percentage of estimated total population by Census Block Group

Data Source: ACS 2016 B03002 HISPANIC OR LATINO ORIGIN BY RACE
Black Population Concentration in
The Thomas Jefferson Planning District - 2016

Impacted area defined as areas of racial or ethnic minority concentration where the percentage of a specific minority or ethnic group is 10 percent or more than in the City or County containing the area.

Charlottesville: 29.0%
Albemarle: 19.9%
Greene: 16.8%
Louisa: 26.2%
Nelson: 22.1%

Percentage of Individuals Self Reporting as Black Alone

Individuals self reporting as Black or African Alone as a percentage of estimated total population by Census Block Group

Data Source: ACS 2016 B02001 RACE
iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration.

The following index has been derived for 2017 from races and ethnicities recorded for elementary school students throughout the region, set in the historic context of indices recorded by census tracts.

**Figure 2 – Measure of Racial and Ethnic Spatial Segregation in the Region, 1980-2017**

![Graph showing measure of racial and ethnic spatial segregation](image)

*Source: Virginia Department of Education, U.S. Census Bureau*
Dissimilarity index data for the region subpopulations appear in the following table. The data indicate that in order to achieve full integration among White persons and Black persons in the region, 42 percent of Black residents would have to move to a different location within the region. The dissimilarity index is merely a tool to measure segregation. The goal is not to force black communities to move; black communities need to be preserved.

<table>
<thead>
<tr>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Black-White</td>
<td>45%</td>
<td>39%</td>
<td>33%</td>
<td>35%</td>
<td>42%</td>
</tr>
<tr>
<td>Hispanic-White</td>
<td>24%</td>
<td>22%</td>
<td>24%</td>
<td>36%</td>
<td>35%</td>
</tr>
<tr>
<td>Asian-White</td>
<td>42%</td>
<td>48%</td>
<td>51%</td>
<td>47%</td>
<td>48%</td>
</tr>
</tbody>
</table>

The index declined steadily from 45% to 33% in the 20 years between 1980 and 2000 but has risen between 2000 and 2017 to 42%. This index increased by seven percent since 2009. The indices also show that the region has a White/Hispanic index of 35 percent and a White/Asian index of 48 percent.

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household’s eligibility for a home mortgage loan. A review of median household income reveals a stark contrast between races and ethnicity in the region. In the City, the median household incomes for Blacks and Asians were equivalent to only 44% and 68% respectively of the median household income for Whites, while the median income for Hispanics was higher at 89.5% of that for Whites. Differences in poverty are evident as well. About 31 percent of Blacks and 48 percent of Asians were more likely to live below the poverty level in comparison to 22 percent of Whites.

In Albemarle County, the median household incomes for Blacks and Hispanics were equivalent to 64 percent and 60 percent respectively of the median household income for Whites, while Asians had nearly the same income as Whites (98.8%). Differences in poverty are also evident between Whites and Blacks in Albemarle. In Fluvanna County, the median household incomes for Blacks and Hispanics were equivalent to 78 percent and 63 percent of the median household income for Whites (no data available for Asians). Significant differences in poverty exist between Blacks (19.1 percent) and Asians (11.5 percent) compared to Whites (4.3 percent). In Greene County, the median household incomes for Blacks and Hispanics were equivalent to 65 percent and 80 percent of the median household income for Whites. There was no data available for Asians. Significant differences in poverty exist between Hispanics (47.1%) and Blacks (21.2 percent) compared to Whites (9.5 percent). In Louisa County, the median household incomes for Blacks and Hispanics were equivalent to 71.3 percent and 87.5 percent of the median household income for Whites. There was no data available for Asians. Significant differences in poverty are evident between Hispanics (29 percent) and Whites (11 percent). In Nelson County, the median household incomes for Blacks were equivalent to 63 percent of the median household income for Whites. There was no data available for Asians and...
Hispanics. Significant differences in poverty are evident between Whites and Blacks in comparison to Hispanics.

Overall the data shows that regionally, the disparities between the median household income for Blacks in comparison to Whites, are much more evident in the City, whereas disparities between the median household income for Hispanics in comparison to Whites are much more evident in the Counties. The percentage of Blacks and Asians living below the poverty level are greater in the City, than in the outlying Counties, however, the percentage of Hispanics living below the poverty level are greater in Greene County and Louisa County.

Table 5 - Median Household Income and Poverty Rates by Race/Ethnicity, 2016

<table>
<thead>
<tr>
<th></th>
<th>Median Household Income</th>
<th>Percent Below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City of Charlottesville</strong></td>
<td>$50,727.00</td>
<td>25.9%</td>
</tr>
<tr>
<td>White</td>
<td>$60,087.00</td>
<td>22%</td>
</tr>
<tr>
<td>Black</td>
<td>$26,590.00</td>
<td>30.6%</td>
</tr>
<tr>
<td>Asian</td>
<td>$41,086.00</td>
<td>48.2%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>$53,814.00</td>
<td>18.9%</td>
</tr>
<tr>
<td><strong>Albemarle County</strong></td>
<td>$70,342.00</td>
<td>9.70%</td>
</tr>
<tr>
<td>White</td>
<td>$73,383.00</td>
<td>8.6%</td>
</tr>
<tr>
<td>Black</td>
<td>$47,260.00</td>
<td>18.7%</td>
</tr>
<tr>
<td>Asian</td>
<td>$72,470.00</td>
<td>11.0%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>$48,904.00</td>
<td>7.5%</td>
</tr>
<tr>
<td><strong>Fluvanna County</strong></td>
<td>$66,425.00</td>
<td>6.9%</td>
</tr>
<tr>
<td>White</td>
<td>$67,297.00</td>
<td>4.3%</td>
</tr>
<tr>
<td>Black</td>
<td>$52,292.00</td>
<td>19.1%</td>
</tr>
<tr>
<td>Asian</td>
<td>N/A</td>
<td>11.5%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>$42,826.00</td>
<td>5.3%</td>
</tr>
<tr>
<td><strong>Greene County</strong></td>
<td>$61,615.00</td>
<td>11%</td>
</tr>
<tr>
<td>White</td>
<td>$62,885.00</td>
<td>9.5%</td>
</tr>
<tr>
<td>Black</td>
<td>$40,769.00</td>
<td>21.2%</td>
</tr>
<tr>
<td>Asian</td>
<td>N/A</td>
<td>0.0%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>$50,469.00</td>
<td>47.1%</td>
</tr>
<tr>
<td><strong>Louisa County</strong></td>
<td>$54,662.00</td>
<td>12%</td>
</tr>
<tr>
<td>White</td>
<td>$57,696.00</td>
<td>11%</td>
</tr>
<tr>
<td>Black</td>
<td>$41,138.00</td>
<td>16%</td>
</tr>
<tr>
<td>Asian</td>
<td>N/A</td>
<td>0.00%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>$42,723.00</td>
<td>29%</td>
</tr>
<tr>
<td><strong>Nelson County</strong></td>
<td>$50,994.00</td>
<td>14.6%</td>
</tr>
<tr>
<td>White</td>
<td>$52,934.00</td>
<td>14.4%</td>
</tr>
<tr>
<td>Black</td>
<td>$33,409.00</td>
<td>18.1%</td>
</tr>
<tr>
<td>Asian</td>
<td>N/A</td>
<td>0.0%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>N/A</td>
<td>4.9%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2012-2016 American Community Survey (B19013, B19013A, B19013B, B19013D, B1913I)
There are also significant differences in income distribution in Charlottesville. In 2011, 29 percent of White households had incomes below $25,000 compared to 32 percent of all Black households. The middle-income ranges had 35 percent of Black households having incomes within the $25,000 to $49,999 range compared to 22 percent of White households, and 13 percent of Black households within the $50,000 to $74,999 range compared to 16 percent of White households. On the opposite end of the spectrum, 20 percent of Black households earned $75,000 or higher compared to 34 percent of White households. Data on household income distribution for Asians and Hispanics was not available.

Table 6 – City of Charlottesville Household Income Distribution by Race, 2013

<table>
<thead>
<tr>
<th></th>
<th>$0 to $24,999</th>
<th>$25,000 to $49,999</th>
<th>$50,000 to $74,999</th>
<th>$75,000 and higher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>All Households</td>
<td>16,038</td>
<td>29%</td>
<td>3879</td>
<td>24%</td>
</tr>
<tr>
<td>White Households</td>
<td>13092</td>
<td>29%</td>
<td>2857</td>
<td>22%</td>
</tr>
<tr>
<td>Black Households</td>
<td>2946</td>
<td>32%</td>
<td>1022</td>
<td>35%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2011-2013 American Community Survey (B19001A, B19001B)

*Data for Asian and Hispanic households not available

In Albemarle County, there were significant differences in income distribution. In 2011, 13 percent of White households had incomes below $25,000 compared to 34 percent of all Black households. The middle-income ranges were more comparable with 20% of Black households having incomes within the $25,000 to $49,999 range compared to 21 percent of White households, and 23 percent of Black households within the $50,000 to $74,999 range compared to 17 percent of White households. On the opposite end of the spectrum, 23 percent of Black households earned $75,000 or higher compared to 49 percent of White households. Data on household income distribution for Asians and Hispanics was not available.

Table 7 – Albemarle County Household Income Distribution by Race, 2013

<table>
<thead>
<tr>
<th></th>
<th>$0 to $24,999</th>
<th>$25,000 to $49,999</th>
<th>$50,000 to $74,999</th>
<th>$75,000 and higher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>All Households</td>
<td>36,387</td>
<td>15%</td>
<td>7506</td>
<td>21%</td>
</tr>
<tr>
<td>White Households</td>
<td>33117</td>
<td>13%</td>
<td>6844</td>
<td>21%</td>
</tr>
<tr>
<td>Black Households</td>
<td>3270</td>
<td>34%</td>
<td>662</td>
<td>20%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2011-2013 American Community Survey (B19001A, B19001B)

*Data for Asian and Hispanic households not available

OBSERVATION: In the City, the median household income among Blacks and Asians was equivalent to only 44% and 68% that of Whites in 2011 and persons living below the poverty level was much more likely among Blacks and Asians. Consequently, Blacks and Asians will have greater difficulty finding affordable housing. Regionally, disparities between the median household income for Blacks in comparison to Whites, are much more evident in the City, whereas disparities between the median household income for Hispanics are much more evident in the Counties. The percentage of Blacks and Asians living below the poverty level are greater in the City, than in the outlying Counties, however, the percentage of Hispanics living below the poverty level are greater in Greene County and Louisa County.
v. Concentrations of LMI Persons
The CDBG program includes a statutory requirement that 70 percent of the funds invested benefit low and moderate-income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as the City of Charlottesville. HUD data reveals that there are 22 census block groups where more than 51% of residents meet the criteria for LMI status. Of the 22 block groups, there are some block groups that meet the LMI criteria due to locations in which University of Virginia (UVA) students tend to reside. To account for this, the City targets CDBG funds in four neighborhoods (nine census block groups). Of the nine census block groups, seven block groups are located within areas of racial concentration. As a result, areas of racial concentration are more likely to also be areas of concentration of LMI persons. Map 4 on the following page illustrates the location of concentrations of Black residents and the concentration of LMI persons.

**Observation:** Of the 22 LMI census block groups in Charlottesville, nine are located within impacted areas of Black residents. As a result, areas of racial concentration are more likely to also be areas of concentration of LMI persons.
The Percentage of Low and Moderate Income Persons By Block Group - 2018 and Black Population Concentration in The Thomas Jefferson Planning District- 2016

Impacted area defined as areas of racial or ethnic minority concentration where the percentage of a specific minority or ethnic group is 10 percent or more than in the City or County containing the area.

Charlottesville: 29.0%
Albemarle: 19.9%
Greene: 16.8%
Louisa: 26.2%
Nelson: 22.1%

Individuals self reporting as Black or African Alone as a percentage of estimated total population by Census Block Group

Data Source: ACS 2016 B02001 RACE, Census Block Group 2010, ACS Low-Mod Summary Data for VA by Block Group Places
vi. Age and Gender

Virginia Fair Housing law defines the protected class of elderliness as any person aged 55 and over. In the Thomas Jefferson Region, almost 30 percent of the population falls within the category over the age of 55, which is three percent above the state average and two percent above the national average.

**Figure 3 – Population in TJPD Region by Sex and Age, 2016**

![Figure 3](image)

*Source: U.S. Census Bureau*

Overall, there are more females than males in the region. While the number of children under the age of 18 has slightly more males, adult females outnumber males in the region by 10 percent. The difference may be accounted for by the fact that female life expectancy is longer and females are slightly more likely to have moved into the region within the last year than males. The University of Virginia enrolled eight percent more full-time female students than male students for the 2016-2017 academic year, partially explaining the prevalence for female in-migration.

vii. Disability and Income

The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided reasonable accommodation can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).
According to the American Community Survey 2016 (Five-year Estimates), there were 26,419 people (11 percent of the region’s population) with a disability, as defined by the U.S. Census Bureau, in the region. The estimates show that men were slightly more likely to have a disability than women. Eleven percent of all men and women had a disability. The protected classes of race, disability, and elderliness overlap with each other. Blacks are more likely than whites to have a disability, and the incidence of disability increases rapidly as a person ages beyond 65.

Table 8 - Disabilities by Type in the Region
2016 5-Year American Community Survey Estimates

<table>
<thead>
<tr>
<th>Type</th>
<th>Total</th>
<th>%</th>
<th>Type</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>240,532</td>
<td>100%</td>
<td>Cognitive difficulty</td>
<td>9,683</td>
<td>4%</td>
</tr>
<tr>
<td>Any disability</td>
<td>26,419</td>
<td>11%</td>
<td>Ambulatory difficulty</td>
<td>14,112</td>
<td>6%</td>
</tr>
<tr>
<td>Hearing difficulty</td>
<td>7,793</td>
<td>3%</td>
<td>Self-care difficulty</td>
<td>5,464</td>
<td>2%</td>
</tr>
<tr>
<td>Vision difficulty</td>
<td>4,660</td>
<td>2%</td>
<td>Independent living</td>
<td>6,455</td>
<td>3%</td>
</tr>
</tbody>
</table>

Figure 4 – Percentage of Age Groups with a Disability in the Charlottesville MSA, 2016

Source: U.S. Census Bureau

According to the Virginia Board for People with Disabilities Assessment of Disability Services in Virginia (Employment) for 2017, the gap in employment rates between people with disabilities and without disabilities has not improved in recent years. People with disabilities are less than half as likely to be employed as people without disabilities. Given this information, it is more likely that a significant income gap exists for persons with disabilities, given their lower rate of employment, than for persons without disabilities. In the region, persons with disabilities are much more likely than persons without disabilities to live in poverty. In 2016, among all persons with a disability, 18.33 percent lived below the level of poverty. However, among all persons without a disability, only 12.53 percent were living in poverty.¹

¹ U.S. Census Bureau, 2016 American Community Survey (C18130)
OBSERVATION: In the region, persons with disabilities were more likely to live in poverty compared to persons without disabilities. Among all persons with disabilities, 18.33 percent lived below the level of poverty in 2016, compared to 12.53 percent of persons without a disability.

viii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Women have protection under Title VIII of the Civil Rights Act of 1968 against discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Female-headed households in the region have stayed the same, representing 10 percent of all households in 2011 and 2016. From 2011 to 2016, the number of female-headed households with children decreased by 95 households, a decrease of 1.6 percent. In contrast, married couple family households with children have increased over the same period. In 2011, these households made up 34 percent of all households compared to 40 percent by 2016. The percentage of men raising children alone has increased by five percent, although, these households made up only three percent of all households in 2011 and 2016.

<p>| Table 9 · Regional Household Trends, 2011 and 2016 |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|</p>
<table>
<thead>
<tr>
<th></th>
<th>2016 #</th>
<th>2016 %</th>
<th>2011 #</th>
<th>2011 %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households</td>
<td>93,871</td>
<td>90,654</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Family Households</td>
<td>59,695</td>
<td>64%</td>
<td>56,805</td>
<td>63%</td>
</tr>
<tr>
<td>Married Couple Family</td>
<td>47,225</td>
<td>50%</td>
<td>52,112</td>
<td>57%</td>
</tr>
<tr>
<td>with children</td>
<td>18,669</td>
<td>40%</td>
<td>17,959</td>
<td>34%</td>
</tr>
<tr>
<td>without children</td>
<td>28,556</td>
<td>60%</td>
<td>26,917</td>
<td>52%</td>
</tr>
<tr>
<td>FHH</td>
<td>9,361</td>
<td>10%</td>
<td>8,966</td>
<td>10%</td>
</tr>
<tr>
<td>with children</td>
<td>5991</td>
<td>64%</td>
<td>5,895</td>
<td>66%</td>
</tr>
<tr>
<td>without children</td>
<td>3,370</td>
<td>36%</td>
<td>3,071</td>
<td>34%</td>
</tr>
<tr>
<td>MHH</td>
<td>3109</td>
<td>3%</td>
<td>2,963</td>
<td>3%</td>
</tr>
<tr>
<td>with children</td>
<td>1754</td>
<td>56%</td>
<td>1,341</td>
<td>45%</td>
</tr>
<tr>
<td>without children</td>
<td>1355</td>
<td>44%</td>
<td>1,622</td>
<td>55%</td>
</tr>
<tr>
<td>Non-family households</td>
<td>34,176</td>
<td>36%</td>
<td>33,849</td>
<td>37%</td>
</tr>
</tbody>
</table>

Sources: 2012-2016 American Community Survey (B11005), 2007-2011 American Community Survey

On average, families with children earn less than families without children and typically have even less discretionary income considering the additional costs associated with raising children. According to the U.S. Department of Agriculture, annual child-rearing
expenses for the average middle-income, two-parent family in 2015 ranged from $12,350 to $13,900. According to the data, child-rearing expenses have increased since 2009 by $370 to $700. Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of landlords to rent their units to families with children. In the region in 2016, of all households, six percent of males (14,055) lived below the poverty level while seven percent of females (16,452) lived below the poverty level.

The number of larger, multigenerational families is growing nationwide and statewide, although current data is not available at the regional level. According to the Pew Research Center, in 2016, a record 64 million people, or 20 percent of the U.S. population, lived with multiple generations under one roof. From 2009 to 2016, there was a three percent increase. The Pew Foundation has attributed this trend to a combination of racial and ethnic diversity factors. The Asian and Hispanic populations are growing more rapidly than the White population, and those groups are more likely than Whites to live in multi-generational family households. Most recently, young adults without a college degree have been more likely to live in multi-generational households (adult children are more likely to live with their parents versus cohabitating in their own homes) versus young adults with a college degree who are more likely to be living with a spouse or partner in their own home. Multigenerational families may have special housing requirements. Meetings with stakeholders, specifically stakeholders that represent refugee families have mentioned challenges with locating housing that supports the family size and composition of their clients.

**OBSERVATION:** Families with children make, on average, less than families without children, and typically have even less discretionary income considering the additional costs associated with raising children. The number of female-headed households account for 10 percent of all households while male-headed households only account for three percent. Females are also more likely to experience poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population. Multi-generational families are also growing rapidly and also experience difficulty with locating housing to accommodate family size and composition.

**ix. Ancestry and Income**

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations in the region revealed that eight percent of the region’s residents in 2017 were foreign-born. Families with children who were living with at least one foreign-born parent were far more likely to be living below 200 percent of the poverty line than families with children of native parents. Ninety-one percent of families with children who were living with at least one foreign-born parent had incomes of less than 200 percent of poverty compared to 56 percent of families with children who were living with native parents.  

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2 U.S. Census Bureau, 2013-2017 American Community Survey (B05002)
3 U.S. Census Bureau, 2013 – 2017 American Community Survey (B05010)
OBSERVATION: Families with at least one foreign-born parent were significantly more likely to have lower incomes than families with native-born parents. Ninety-one percent of families with children and at least one foreign-born parent had incomes of less than 200 percent of the poverty level compared to 56 percent of families with children with native parents.

Persons with Limited English Proficiency (LEP) are defined as persons who have a limited ability to read, right, speak, or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP, including immigrants, may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognize their presence and the potential for discrimination, whether intentional or inadvertent, and establish policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

The number of households in the region speaking only Spanish (Speaking English “less than very well”) in 2011 was 3,751, according to the 2007-2011 American Community Survey (5-year estimates). According to the U.S. Census Bureau (American Fact Finder) 2011 – 2015 American Community Survey (5-year estimates), the number of households in the region speaking only Spanish (3,261) decreased by 13% from 2015 to 2011, however, the number of persons speaking English very well increased by 54% from 3,250 to 5,006. Based upon data from the U.S. Census Bureau (American Fact Finder) 2011 – 2015 American Community Survey (5-year estimates), other than English, the population within the region primarily speak Spanish (8,638) and Chinese (2,676). More than half of the households that speak Spanish/Spanish Creole speak English very well and less than half speak English less than very well. In the region, less than half of the households that speak Chinese speak English very well and more than half speak English less than very well. According to the U.S. Census Bureau American Community Survey, 2011-2015, overall, about 1.4 percent of persons living in the region speak English less than well.

Based upon the number or proportion of LEP persons of various language groups served or encountered in the eligible population as of June 2017, the City shall provide language services as indicated in the following table:

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4 U.S. Census Bureau, 2007 – 2011 American Community Survey (B16001)
5 U.S. Census Bureau, 2011 - 2015 American Community Survey (B16001)
Table 10 – City of Charlottesville LEP Determinations

<table>
<thead>
<tr>
<th>Provision of Written Language Assistance</th>
<th>Language Group(s)</th>
<th>Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Translate Vital Documents</td>
<td>• Spanish or Spanish Creole • Chinese</td>
<td>Based upon ACS data, there are more than 1,000 speakers of these languages who speak their native language (other than English), however, more than half speak English very well. Therefore, translation of vital documents is not required.</td>
</tr>
<tr>
<td>Translated Written Notice of Right to Receive Free Oral Interpretation of Documents</td>
<td>• Dari/Farsi/Pashtu/Urdu • Arabic • Nepali • Swahili/Kiswahili • Spanish</td>
<td>Based upon the past experience with LEP persons encountered by CDSS, these are the most common languages for which interpretation is requested.</td>
</tr>
<tr>
<td>No Written Translation Required</td>
<td>• All languages</td>
<td>While no written translation is required, the City shall provide oral interpretation when requested by applicants/participants of its programs.</td>
</tr>
</tbody>
</table>

OBSERVATION: The City of Charlottesville should continue to conduct a four-factor analysis\(^7\) on an annual basis, or as U.S. Census data is updated, to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing its federal entitlement programs. The Thomas Jefferson HOME Consortium should also conduct such an analysis. If it is determined that the need for a LAP exists, the City and the HOME Consortium must prepare the LAP in order to comply with Title VI of the Civil Rights act of 1964.

x. Protected Class Status and Unemployment

As of August 2018, the unemployment in the region was 2.8 percent for the total civilian labor force. The unemployment rate in the region was less than that of the unemployment rate in Virginia and in United States in August 2018. Data on insured unemployed claimants (384 total) in the Thomas Jefferson Region from the Virginia Employment Commission shows that there are more insured unemployed females (210) compared to males (174) and more insured unemployed White residents (261) than Black residents (100). The data showed that there were far less insured unemployed Asian residents (3), Hispanic or Latino residents (1), and residents of other ethnicities/race (17).\(^8\) These data

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\(^7\) The four-factor analysis is detailed in the Federal Register dated January 22, 2007.

\(^8\) Virginia Employment Commission, Economic Information Analytics, September 2018
only take into account insured claimants and does not account for uninsured persons in the region.

Table 11 - Civilian Labor Force (Charlottesville, Albemarle, Fluvanna, Louisa), 2016

<table>
<thead>
<tr>
<th></th>
<th>Cville, Albemarle Fluvanna, Louisa Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>White CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>84,992</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>81,510</td>
<td>95.9</td>
</tr>
<tr>
<td><strong>Black CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>14,180</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>13,396</td>
<td>94.5</td>
</tr>
<tr>
<td><strong>Asian CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>3,855</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>3,649</td>
<td>94.7</td>
</tr>
<tr>
<td><strong>Hispanic CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>4,456</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>4,312</td>
<td>96.8</td>
</tr>
</tbody>
</table>

In 2016, blacks were more likely to be unemployed than White, Asian and Hispanic residents, with an unemployment rate of 5.5 percent versus 4.1 percent for Whites, 5.3 percent for Asians, and 3.2 percent for Hispanics. Data on employment for persons living in Nelson County and Greene County was not available.9

Table 11 - Civilian Labor Force (Charlottesville, Albemarle, Louisa), 2013

<table>
<thead>
<tr>
<th></th>
<th>Cville, Albemarle, Louisa Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Male CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>44,530</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>42,004</td>
<td>94.3%</td>
</tr>
<tr>
<td><strong>Female CLF</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employed</td>
<td>43,865</td>
<td>100%</td>
</tr>
<tr>
<td>Unemployed</td>
<td>41,840</td>
<td>95.4</td>
</tr>
</tbody>
</table>

According to the most recent data from 2013 comparing male and female unemployment rates, males had higher unemployment rates (5.7 percent) than females (4.6 percent) in Charlottesville, Albemarle and Louisa.10

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9 U.S. Census Bureau, American Community Survey 2012-2016 (C23002A, C23002B, C23002D, C23002I)
10 U.S. Census Bureau, American Community Survey 2011-2013 (C23001)
C. Housing Market

i. Housing Inventory

Between 2010 and 2016, a total of 6,233 units were added to the total housing stock in the region, an increase of six percent during that period. Housing stock increases were consistent across the region, with each locality experiencing between a 2.6 percent to an 8.7 percent increase in their housing inventory.

Figure 5 – Change in Total Housing Units, 2010 - 2016

Albemarle County added the greatest number of units (2,594) to their housing inventory, while Greene County experienced the greatest percentage increase in new housing units represented by an 8.7 percent increase in the County’s housing stock. Nelson County saw the slowest growth in new housing units adding only 259 new units to their housing stock between 2010 and 2016: Nelson County’s population decreased slightly between 2010 (14,978) and 2016 (14,895).

Table 12 - Change in Total Housing Units 2010-2016

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle</td>
<td>41,357</td>
<td>41,824</td>
<td>42,332</td>
<td>42,713</td>
<td>43,128</td>
<td>43,579</td>
<td>43,951</td>
<td>2,594</td>
<td>6.3%</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>10,215</td>
<td>10,312</td>
<td>10,406</td>
<td>10,462</td>
<td>10,541</td>
<td>10,596</td>
<td>10,683</td>
<td>468</td>
<td>4.6%</td>
</tr>
<tr>
<td>Greene</td>
<td>7,342</td>
<td>7,439</td>
<td>7,585</td>
<td>7,676</td>
<td>7,790</td>
<td>7,905</td>
<td>7,982</td>
<td>640</td>
<td>8.7%</td>
</tr>
<tr>
<td>Louisa</td>
<td>15,742</td>
<td>16,075</td>
<td>16,293</td>
<td>16,428</td>
<td>16,590</td>
<td>16,692</td>
<td>16,823</td>
<td>1,081</td>
<td>6.9%</td>
</tr>
<tr>
<td>Nelson</td>
<td>9,784</td>
<td>9,859</td>
<td>9,934</td>
<td>9,957</td>
<td>9,990</td>
<td>10,017</td>
<td>10,043</td>
<td>259</td>
<td>2.6%</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>18,943</td>
<td>19,088</td>
<td>19,211</td>
<td>19,373</td>
<td>19,603</td>
<td>19,886</td>
<td>20,134</td>
<td>1,191</td>
<td>6.3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>103,383</strong></td>
<td><strong>104,597</strong></td>
<td><strong>105,761</strong></td>
<td><strong>106,609</strong></td>
<td><strong>107,642</strong></td>
<td><strong>108,675</strong></td>
<td><strong>109,616</strong></td>
<td><strong>6,233</strong></td>
<td><strong>6.0%</strong></td>
</tr>
</tbody>
</table>

Source: US Census Bureau, American Community Survey 2010 - 2016 5-Year Estimates
According to American Community Survey data, a total of 1,645 new units were added to the region’s housing stock between 2015 and 2016. Only 72 of those new units were added in areas with concentrations of racial or ethnic minorities, 70 units in areas with concentrations of Black or African American households, and two units in areas with concentrations of Asian households.

During this same period, the region’s increase in the housing stock was offset by a loss of 743 units. Areas with concentrations of Hispanic or Latino households experienced the greatest decreases losing a total of 255 units, followed by areas with concentrations of Other Races (228 units) and areas with concentrations of Black or African American households (164 units).

Table 13 - Change in Housing Units in Areas of Racial or Ethnic Concentrations, 2015 - 2016

<table>
<thead>
<tr>
<th>Racial/Ethnic Group Concentration</th>
<th>Units Added</th>
<th>Units Lost</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Racial/Ethnic Group Concentration</td>
<td>1410</td>
<td>216</td>
</tr>
<tr>
<td>Racial/Ethnic Group Concentration</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>163</td>
<td>61</td>
</tr>
<tr>
<td>Black or African American</td>
<td>70</td>
<td>164</td>
</tr>
<tr>
<td>Asian</td>
<td>2</td>
<td>35</td>
</tr>
<tr>
<td>Other Race</td>
<td>0</td>
<td>228</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>0</td>
<td>255</td>
</tr>
</tbody>
</table>

OBSERVATION: A total of 1,645 new units were added to the region’s housing stock between 2015 and 2016. Only 72 of those new units were added in areas with concentrations of racial or ethnic minorities. Areas with concentrations of minorities experienced the greatest loss in units.

The region experienced a small increase in owner occupied units (26 units) between 2015 and 2016, while the number of renter occupied units increased by 1,070 during the same period.

ii. Types of Housing Units

According to the 2009 – 2013 American Community Survey, there were 106,592 housing structures in the region. Sixty-nine percent were single-family detached units and seven percent were single-family attached. Most of the remaining units (25 percent) were in multi-family properties of all sizes. Mobile homes accounted for six percent of the housing stock. Compared to the 2005-2009 ACS data, the number units grew by 5,100 units. Single-family attached units grew by 1,196, and all other multi-family units grew by 450 units. Overall, single-family detached units make up about 70% of all units in the region.

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-unit detached structure</td>
<td>73,388</td>
<td>69%</td>
</tr>
<tr>
<td>1-unit, attached structure</td>
<td>7,045</td>
<td>7%</td>
</tr>
<tr>
<td>2-4 units</td>
<td>4,882</td>
<td>5%</td>
</tr>
<tr>
<td>5-19 units</td>
<td>9,799</td>
<td>9%</td>
</tr>
<tr>
<td>20 or more units</td>
<td>5,557</td>
<td>5%</td>
</tr>
<tr>
<td>Mobile Home, boat, RV, van, etc</td>
<td>5,921</td>
<td>6%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>106,592</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Source: 2009-2013 American Community Survey

The City had a total housing stock estimated at 19,866 units in 2015. Just over half the units were single-family detached units with another 9.9 percent as single-family attached units (e.g., townhomes). Two-unit structures, which include both traditional duplexes and houses with an English basement or other accessory unit, represented another 9.0 percent of the inventory. Larger rental buildings with 20 or more units in the structure accounted for 9.9 percent of the rental housing stock. The 174 mobile homes were 0.9 percent of the City’s housing units. Across the metropolitan statistical area, single-family detached and attached units were 73.2 percent of total units.

**NOTE:** The MSA does not include Louisa County.
Figure 7 - Charlottesville Housing Units by Number of Units in Structure, 2015

Source: Housing Needs Assessment, Partners for Economic Solutions, 2018

Figure 8 – Change in Occupied Housing Units 2015-2016 by Unit Type and Tenure

Multifamily units

The percentage of multifamily units (defined as residential properties with 5 or more units) in the region remained stable between 2015 and 2016, measuring 12.5% and 12.3 percent of the total housing stock respectively.

Table 15 - Multifamily Units as Percentage of Total Housing Units, 2015

<table>
<thead>
<tr>
<th>Locality</th>
<th>Total Units</th>
<th>5-9 Units</th>
<th>10-19 Units</th>
<th>20-49 Units</th>
<th>50 Units or More</th>
<th>% Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle County</td>
<td>38,853</td>
<td>1,276</td>
<td>2,969</td>
<td>1,129</td>
<td>1,445</td>
<td>17.6%</td>
</tr>
<tr>
<td>Fluvanna County</td>
<td>9,891</td>
<td>46</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.5%</td>
</tr>
<tr>
<td>Greene County</td>
<td>7,111</td>
<td>9</td>
<td>37</td>
<td>72</td>
<td>0</td>
<td>1.7%</td>
</tr>
<tr>
<td>Louisa County</td>
<td>12,829</td>
<td>44</td>
<td>119</td>
<td>74</td>
<td>15</td>
<td>2.0%</td>
</tr>
<tr>
<td>Nelson County</td>
<td>6,339</td>
<td>81</td>
<td>9</td>
<td>102</td>
<td>15</td>
<td>3.3%</td>
</tr>
<tr>
<td>City of Charlottesville</td>
<td>17,752</td>
<td>1,170</td>
<td>1,332</td>
<td>932</td>
<td>691</td>
<td>23.2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>92,775</strong></td>
<td><strong>2,626</strong></td>
<td><strong>4,466</strong></td>
<td><strong>2,309</strong></td>
<td><strong>2,166</strong></td>
<td><strong>12.5%</strong></td>
</tr>
</tbody>
</table>

Source: American Community Survey 2011–2015 5-year Estimates

Table 16 - Multifamily Units as Percentage of Total Housing Units - 2016

<table>
<thead>
<tr>
<th>Locality</th>
<th>Total Units</th>
<th>5-9 Units</th>
<th>10-19 Units</th>
<th>20-49 Units</th>
<th>50 Units or More</th>
<th>% Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle County</td>
<td>39,431</td>
<td>1,280</td>
<td>2,803</td>
<td>1,062</td>
<td>1,287</td>
<td>16.3%</td>
</tr>
<tr>
<td>Fluvanna County</td>
<td>9,829</td>
<td>44</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.4%</td>
</tr>
<tr>
<td>Greene County</td>
<td>7,107</td>
<td>12</td>
<td>52</td>
<td>88</td>
<td>0</td>
<td>2.1%</td>
</tr>
<tr>
<td>Louisa County</td>
<td>13,146</td>
<td>63</td>
<td>167</td>
<td>64</td>
<td>29</td>
<td>2.5%</td>
</tr>
<tr>
<td>Nelson County</td>
<td>6,378</td>
<td>36</td>
<td>0</td>
<td>139</td>
<td>16</td>
<td>3.0%</td>
</tr>
<tr>
<td>City of Charlottesville</td>
<td>17,980</td>
<td>1,338</td>
<td>1,550</td>
<td>793</td>
<td>732</td>
<td>24.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>93,871</strong></td>
<td><strong>2,773</strong></td>
<td><strong>4,572</strong></td>
<td><strong>2,146</strong></td>
<td><strong>2,064</strong></td>
<td><strong>12.3%</strong></td>
</tr>
</tbody>
</table>

Source: American Community Survey 2012–2016 5-year Estimates

Four localities increased the number of multifamily units in their jurisdictions during the same period: Greene County, Louisa County, Nelson County and the City of Charlottesville. Charlottesville saw the greatest increase in multifamily units, with the percentage of multifamily units growing by 1.5% between 2015 and 2016.
Since 2010, multi-family construction increased from 2010 to 2011 and decreased from 2011 to 2014. Multifamily construction remained stable from 2014 to 2015 and increased from 2015 – 2016 where construction continued to grow. Since 2010, single-family construction remained about the same and most recently began to increase in 2015 and 2016. Multi-family construction has continued to outgrow single-family construction since 2010.
iii. Supported Housing

Publicly assisted housing includes public housing owned by the Charlottesville Redevelopment and Housing Authority (CRHA), other units that have received financial assistance from the US Department of Housing and Urban Development (HUD) and private development funded with Low-Income Housing Tax Credits (LIHTC) from the U.S. Department of the Treasury. There are a number of housing units throughout the region that are made available for below market rate to income-qualified owners or renters, providing affordable living options to households that would otherwise be priced out of the market. Supported housing includes homes supported by public agencies and non-profit housing providers with federal, state, and local funding, as well as privately-owned units dedicated as affordable through deed restrictions.

CRHA has an inventory of 376 public housing units – 371 in seven complexes as well as five units on scattered sites. Since 1965, additions to the public housing stock have been limited. The age of CRHA housing is a major issue as many units are reaching the end of their useful lives. Public housing serves primarily extremely low-income individuals and families, though residents are not forced to move when their incomes increase above 30 percent of AMI. Black residents constitute a larger share of public housing residents.

Map 4 – Charlottesville Redevelopment and Housing Authority Properties
Housing Choice Vouchers are issued to income-qualified households to supplement market rents to an affordable level. Unlike supply-side supported housing, the vouchers can be used to secure a qualified rental unit within the agencies’ service area or transferred to any region in the country. Vouchers allow extremely-low-income families, the elderly and people with disabilities to pay 30 percent of their income for rent with HUD making up the difference between what they pay and fair market rents. Given the high rents prevailing in the City, many of the vouchers administered by CRHA are actually used to rent housing in surrounding counties and as far away as Richmond. According to the Housing Needs Assessment, many of those used in the City are used in LIHTC buildings to lease units designated for households at up to 60 percent of AMI. In 2018, a total of around 1,955 vouchers were held by renters throughout the region, an increase from approximately 1,270 in 2009.

Table 17 - Number of Active Housing Choice Vouchers in Region, 2009 and 2018

<table>
<thead>
<tr>
<th>Voucher Holder</th>
<th>2009</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charlottesville Housing and Redevelopment Authority</td>
<td>268</td>
<td>700</td>
</tr>
<tr>
<td>Albemarle County*</td>
<td>414</td>
<td>386</td>
</tr>
<tr>
<td>Fluvanna/Louisa Housing Foundation</td>
<td>146</td>
<td>147</td>
</tr>
<tr>
<td>Nelson County</td>
<td>54</td>
<td>66</td>
</tr>
<tr>
<td>Mainstream Housing Vouchers (regional, administered by Alb Co.)</td>
<td>75</td>
<td>75</td>
</tr>
<tr>
<td>Skyline CAP (Greene, Madison, Orange)</td>
<td>300+</td>
<td>319</td>
</tr>
<tr>
<td>Region 10 (regional)</td>
<td>10</td>
<td>242 HCV-MI &amp; 20 SRAP</td>
</tr>
</tbody>
</table>

*Totals include Mainstream Housing Vouchers dedicated for people with disabilities, Albemarle County numbers represent vouchers leased-up

The CRHA waiting lists for public housing and housing choice vouchers have been closed for several years. They now number 1,651 unduplicated households. This represents an eight-year wait for a voucher or seven years for a public housing unit. Sixty-eight to 70 percent of these households currently live or work in the City. More than half of those on the waiting lists are single people. Eighty-three percent of the persons on the waitlist are extremely low-income and 52 percent of those persons on the waitlist are one-person households. Thirty-percent of those persons on the waitlist are two and three person households. Black residents make up the majority of CRHA voucher holders.

In the City, eleven developments that have received LIHTC funding from 1988 through 2014 continue to provide 720 affordable units. The existing inventory of assisted housing affordable to low-income households includes 376 units of public housing and 720 units of housing financed with Low-Income Housing Tax Credits. Of those, 439 need to be replaced in the near future due to age, obsolescence and the growing costs to maintain them in good condition. For those LIHTC developments where information is available on the mix of units, studios and one-bedroom units constitute 37 percent of the supply, two-bedroom units represent 40 percent, and three- and four-bedroom units are 23 percent of total units. Most of the LIHTC units were developed for households with incomes at 50 to 60 percent of Area Median Income (AMI).
OBSERVATION: Black residents constitute the majority of public housing and housing choice voucher residents.

iv. Foreclosure Trends

The foreclosure data presented below has been derived from RealtyTrac, a private firm tracking real estate trends by month, and HUD’s Neighborhood Stabilization Program, which Congress formed through the 2008 Economic Recovery Act as a way to target federal investments to areas with demonstrable needs. Between February 2017 and January 2018, the Thomas Jefferson Region had an estimated 430 foreclosure filings, representing a foreclosure rate of 0.06%. Across the region, the City and Greene County rates stayed the same while all other locality foreclosure rates decreased consistent with the state and nationwide trend. Although the foreclosure rate in the City stayed the same, the City’s foreclosure rate is the highest compared to other localities in the region, as well as the state and the nation.

Table 18 - Foreclosure Rates in the Region 2018

<table>
<thead>
<tr>
<th>Geographic Area</th>
<th>Foreclosure Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charlottesville</td>
<td>0.10%</td>
</tr>
<tr>
<td>Albemarle</td>
<td>0.03%</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>0.07%</td>
</tr>
<tr>
<td>Greene</td>
<td>0.05%</td>
</tr>
<tr>
<td>Louisa</td>
<td>0.09%</td>
</tr>
<tr>
<td>Nelson</td>
<td>0.04%</td>
</tr>
<tr>
<td>Region</td>
<td>0.06%</td>
</tr>
<tr>
<td>Virginia</td>
<td>0.04%</td>
</tr>
<tr>
<td>United States</td>
<td>0.05%</td>
</tr>
</tbody>
</table>
Figure 11 – 12-Month Average Foreclosure Rates in the Region, 2017-2018

Source: Realty-Trac Feb 2017 – Jan 2018

v. Protected Class Status and Home Ownership

The value in homeownership lies in the accumulation of wealth as the owner’s share of equity increases with the property’s value. Paying a monthly mortgage instead of rent is an investment and an asset that is likely to appreciate. In the Charlottesville region, homeownership rates among racial and ethnic minority households is significantly lower than that of White households. Homeownership rates for Black or African American households is highest in Louisa County at 15.4 percent, which exceeds the Black/African American homeownership rates for the State of Virginia (13.5 percent) and the United States as a whole (eight percent). Homeownership rates for Asian households, households of Other Races, and Hispanic or Latino households living in the region, however, are well below the homeownership rates for similar households in the Virginia or across the country.

Table 19 – Owner-Occupied Units by Race/Ethnicity as Percentage of Total Owner Occupied Units, 2010-2016

<table>
<thead>
<tr>
<th>Locality</th>
<th>White</th>
<th>Black or African American</th>
<th>Asian</th>
<th>Other Race</th>
<th>Hispanic or Latino</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle</td>
<td>91.0%</td>
<td>4.9%</td>
<td>2.4%</td>
<td>1.7%</td>
<td>2.2%</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>86.6%</td>
<td>11.1%</td>
<td>0.6%</td>
<td>1.6%</td>
<td>1.9%</td>
</tr>
<tr>
<td>Greene</td>
<td>91.3%</td>
<td>4.5%</td>
<td>1.3%</td>
<td>2.9%</td>
<td>3.2%</td>
</tr>
<tr>
<td>Louisa</td>
<td>82.1%</td>
<td>15.4%</td>
<td>0.5%</td>
<td>2.1%</td>
<td>1.1%</td>
</tr>
<tr>
<td>Nelson</td>
<td>87.7%</td>
<td>11.1%</td>
<td>0.0%</td>
<td>1.2%</td>
<td>0.4%</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>86.0%</td>
<td>9.2%</td>
<td>3.2%</td>
<td>1.6%</td>
<td>2.7%</td>
</tr>
<tr>
<td>Virginia</td>
<td>78.9%</td>
<td>13.5%</td>
<td>4.9%</td>
<td>2.6%</td>
<td>4.2%</td>
</tr>
<tr>
<td>United States</td>
<td>83.8%</td>
<td>8.0%</td>
<td>4.0%</td>
<td>4.2%</td>
<td>9.0%</td>
</tr>
</tbody>
</table>

Source: US Census Bureau, Demographic Characteristics for Occupied Housing Units. 2012-2016 American Community Survey 5-Year Estimates
HOMEOWNERSHIP RATES AND PROTECTED CLASS STATUS, 2016

Source: US Census Bureau, Demographic Characteristics for Occupied Housing Units. 2012-2016 American Community Survey 5-Year Estimates

OBSERVATION: Lower household incomes among Blacks and Hispanics are reflected in similarly lower homeownership rates when compared to Whites. Across the region, the homeownership rate for Blacks ranged between 4.5 percent and 15.4 percent; for Hispanics 0.4 percent and 2.2 percent; and for Asians 0 percent and 3.2 percent. The rate for Whites ranged between 82.1 percent and 91.3 percent.

vi. The Tendency of the Protected Classes to Live in Larger Households

Household size is an important factor in assessing housing opportunities in the community. A larger family has much different housing requirements than a single-person household. Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

According to discussions with community stakeholders, refugee and Latino families tend to have large families (6 – 7 persons) per household and families have experienced hesitation on behalf of property owners when it comes to placing a larger family in a unit. Local zoning ordinances and regulations limit the number of people who can live in a unit.
In 2013, the Thomas Jefferson Planning District had an average household size of 2.60. Household size has been decreasing since 1960, when it was 3.29. That trend appears to have stabilized, with a slight increase in household size between 2010 and 2013. According to the Housing Needs Assessment, small households of one or two persons dominate both City and metro area households with 66.7 and 63.4 percent of total households, respectively. **NOTE: The MSA does not include Louisa County.** The City has 517 households with six or more members – 2.9 percent of all households.

**Figure 13 – Charlottesville Households by Household Size, 2017**

![Charlottesville Households by Household Size, 2017](image)

*Source: Housing Needs Assessment, Partners for Economic Solutions, 2018*

**Figure 14 – Affordable Units to Rent by Size of Unit, 2018**

![Affordable Units to Rent by Size of Unit (2018)](image)

A majority of the three-bedroom rental units, with enough space to meet the needs of households larger than two persons are priced for persons making incomes of $60,000 - $75,000.
Housing Units by Number of Bedrooms

Family sized units, or housing units with three or more bedrooms, are more prevalent in the region’s owner-occupied housing stock than in the renter-occupied housing supply (85% and 42% respectively).

Table 20 – Number of Owner and Renter-Occupied Units in the Region by Number of Bedrooms, 2016

<table>
<thead>
<tr>
<th>Locality</th>
<th>Total</th>
<th>No bedroom</th>
<th>1 bedroom</th>
<th>2 bedrooms</th>
<th>3 bedrooms</th>
<th>4 bedrooms</th>
<th>5 bedrooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle</td>
<td>25,584</td>
<td>55</td>
<td>352</td>
<td>3,517</td>
<td>10,988</td>
<td>7,942</td>
<td>2,730</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>7,804</td>
<td>0</td>
<td>90</td>
<td>680</td>
<td>4,919</td>
<td>1,654</td>
<td>461</td>
</tr>
<tr>
<td>Greene</td>
<td>5,546</td>
<td>2</td>
<td>87</td>
<td>410</td>
<td>3,505</td>
<td>1,237</td>
<td>305</td>
</tr>
<tr>
<td>Louisa</td>
<td>10,288</td>
<td>0</td>
<td>93</td>
<td>1,364</td>
<td>6,411</td>
<td>2,064</td>
<td>356</td>
</tr>
<tr>
<td>Nelson</td>
<td>4,649</td>
<td>33</td>
<td>95</td>
<td>705</td>
<td>2,748</td>
<td>805</td>
<td>263</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>7,579</td>
<td>8</td>
<td>149</td>
<td>1,393</td>
<td>3,863</td>
<td>1,731</td>
<td>435</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>61,450</td>
<td>98</td>
<td>866</td>
<td>8,069</td>
<td>32,434</td>
<td>15,433</td>
<td>4,550</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Locality</th>
<th>Total</th>
<th>No bedroom</th>
<th>1 bedroom</th>
<th>2 bedrooms</th>
<th>3 bedrooms</th>
<th>4 bedrooms</th>
<th>5 bedrooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle</td>
<td>13,847</td>
<td>177</td>
<td>2,765</td>
<td>5,950</td>
<td>3,779</td>
<td>942</td>
<td>234</td>
</tr>
<tr>
<td>Fluvanna</td>
<td>2,025</td>
<td>21</td>
<td>90</td>
<td>361</td>
<td>1,216</td>
<td>302</td>
<td>35</td>
</tr>
<tr>
<td>Greene</td>
<td>1,561</td>
<td>52</td>
<td>82</td>
<td>501</td>
<td>729</td>
<td>151</td>
<td>46</td>
</tr>
<tr>
<td>Louisa</td>
<td>2,858</td>
<td>39</td>
<td>188</td>
<td>1,028</td>
<td>1,363</td>
<td>187</td>
<td>53</td>
</tr>
<tr>
<td>Nelson</td>
<td>1,729</td>
<td>49</td>
<td>288</td>
<td>564</td>
<td>689</td>
<td>125</td>
<td>14</td>
</tr>
<tr>
<td>Charlottesville</td>
<td>10,401</td>
<td>373</td>
<td>2,306</td>
<td>4,064</td>
<td>2,496</td>
<td>890</td>
<td>272</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>32,421</td>
<td>711</td>
<td>5,719</td>
<td>12,468</td>
<td>10,272</td>
<td>2,597</td>
<td>654</td>
</tr>
</tbody>
</table>

Source: US Census Bureau, 2012-2016 American Community Survey Five-Year Estimates

According to CRHA data, a majority of households residing in public housing (119 out of 376) are living in one-bedroom units. There are 89 two-bedroom units and 120 three-bedroom units. The number of units decrease drastically for four to five bedroom units. In addition, over 50 percent of the applicants on the waitlist are one-person households and 30 percent total make up the number of applicants who are two and three person households on the waitlist.

The CRHA data also indicates that there is more of a need for accessible public housing to accommodate persons who are elderly and/or disabled. The needs which are most frequently expressed by public housing tenants and those on the waiting list for accessible units include units that are equipped with dwelling space to accommodate a live-in aid, one-level units that do not require residents to navigate steps, and units that are equipped with a walk-in bathtub.
OBSERVATION: Family sized units, or housing units with three or more bedrooms, are more prevalent in the region’s owner-occupied housing stock than in the renter-occupied housing supply (85 percent and 42 percent respectively).

vii. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in certain areas.

Recent data shows that **High housing cost burden** is the greatest housing problem in the Thomas Jefferson Region. According to 2009 - 2013 CHAS data, over 22 percent of all households in the region were considered cost-burdened. Households that paid between 30 percent and 50 percent of their monthly income on housing were considered moderately cost-burdened. The data shows, 11,739 renter households and 9,159 homeowner households earned below the median income and spent greater than 30 percent of their income on housing, and over half spent 50 percent of their income on housing. Many higher-income households spend significantly less than 30 percent of their income for housing. Spending less than 30 percent, they occupy units that would otherwise seem to be available for lower income households.

Populations most affected by these housing problems are households that are extremely low (up to 30 percent of the AMI) and very-low-income and earn less than 50 percent of the AMI, renters in all low-income categories that experience a housing problem, elderly homeowners with cost-burdens in excess of 30 percent and 50 percent of their income and persons with special housing needs.

a. Rental Housing

In the City of Charlottesville, according to 2010-2014 HUD data, renter households were more cost-burdened and severely cost-burdened than owner households in the City. More specifically, 68 percent of renter households and 67 percent of owner households who earned less than 30 percent of AMI were cost-burdened with 63 percent renter and 40 percent owner households being severely-cost burdened. According to the Housing Needs Assessment, HUD data also shows that 71 percent of renter households and 36 percent of owner households earning between 30 percent and 50 percent of AMI were also cost-burdened with 37 percent renter and 26 percent owner households earning 30 percent to 50 percent of AMI being severely cost-burden. In the metropolitan area, the trends were similar.

The Gap Analysis for the Charlottesville Metropolitan Statistical Area (MSA) from A Report for Virginia’s Housing Policy Advisory Council released November 2017 indicates a high cost-burden, and also notes that there is an insufficient supply of rental units affordable to households with incomes under 30 percent of the AMI. Additionally, households with higher incomes occupy the majority of units affordable to that income group. Although there are physically enough units for households in the 30 percent to 80 percent Area Median Income (AMI) range, households with higher incomes occupy many of the units. A significant percentage of units affordable in the 30 percent to 80 percent
age range are also occupied by households with incomes lower than required to rent affordably. There are also a high number of vacant, for-rent units among those affordable to households in the 30 percent to 80 percent AMI range, which may indicate issues with those units.

**Figure 15 – Advertised Apartments in the Region Affordable to Each Income Category, 2018**

![Chart](image)

The chart above assesses how many rental units in the region were available within financial reach of households in the region. According to the chart, most rental advertised rental units in the region are priced for households with incomes ranging from $30,000 - $50,000. For households in the region making less than $30,000, there are few affordable rental options available.

A housing affordability index created by the Center for Housing Research and Housing Virginia shows that in 2016, the median household in the City of Charlottesville would have to spend 25 percent of their income to rent the median priced unit. In Albemarle County, the threshold is 21 percent of income to rent a median priced unit. In the MSA, the median household would have to spend 22 percent to acquire the median priced unit. All figures, with the exception of renting in Albemarle, exceed the statewide index of 25 percent for buying a home. **NOTE: The MSA does not include Louisa County.**

**Observation:** Renters in the region were more cost-burdened and severely cost-burdened than homeowners. There is also an insufficient housing supply for renters who make 0-30 percent of the AMI. Households with higher incomes are occupying units affordable to households that are low to moderate income.
The Department of Housing and Urban Development (HUD) provides annual information on the Fair Market Rent (FMR). In the Charlottesville Metropolitan Area, the Fair Market Rent (FMR) for a two-bedroom apartment is $1,179. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn $3,930 monthly or $47,160 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $22.67.

In Virginia and the MSA, a minimum wage worker earns an hourly wage of $7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work about 125 hours per week, 52 weeks per year. Or, a household must include about 3.1 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable. These figures do not account for other required living expenses such as food, childcare, medical, and transportation.

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>2018 Fair Market Rent</th>
<th>110% of FMR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>$752</td>
<td>$827</td>
</tr>
<tr>
<td>One Bedroom</td>
<td>$1,027</td>
<td>$1,129</td>
</tr>
<tr>
<td>Two Bedrooms</td>
<td>$1,179</td>
<td>$1,296</td>
</tr>
<tr>
<td>Three Bedrooms</td>
<td>$1,478</td>
<td>$1,625</td>
</tr>
<tr>
<td>Four Bedrooms</td>
<td>$1,772</td>
<td>$1,949</td>
</tr>
</tbody>
</table>

Charlottesville Redevelopment and Housing Authority (CRHA) rents are authorized to reach 110 percent of FMRs. According to the Housing Needs Assessment, given the high rents prevailing in the City, many of the vouchers administered by CRHA are actually used to rent housing in surrounding counties and as far away as Richmond. Many of the vouchers used in the City are used in LIHTC buildings to lease units designated for households at up to 60 percent of the AMI.

**OBSERVATION:** Single-income minimum wage households cannot afford a housing unit renting for the HUD fair market rent in the MSA. This situation can force these individuals and households to double up with others, or lease cheap, substandard units. Minorities and persons with disabilities are likely to be disproportionately impacted because of their lower incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $750 throughout Virginia and in the region. If SSI represents an individual's sole source of income, $225 in monthly rent is affordable, while the FMR for a studio is $752 and a one-bedroom is $1,027.

**OBSERVATION:** Persons receiving SSI, including persons with disabilities, as their sole source of income, cannot afford a studio or a one-bedroom unit renting at the fair market rate of $752 and $1,027.
b. Owner-Occupied Housing

There is a shortage of homeowner-occupied units affordable to households under 50 percent AMI, and there are households with higher incomes occupying the majority of those homes. Households with incomes lower than what is required to own in the 80 to 100 percent AMI income range occupy a very high percentage of units in that affordability range.

A housing affordability index created by the Center for Housing Research and Housing Virginia shows that in 2016, the median household in the City of Charlottesville would have to spend 35 percent of their income to acquire a median priced house. In Albemarle County, the threshold is 29 percent of income to acquire a median priced house. In the MSA, the median household would have to spend 27 percent to acquire a median priced house. These figures exceed the statewide index of 25 percent for buying a home.

According to the Housing Needs Assessment, over the last five years, home prices in the City have escalated rapidly. The median single-family detached unit sale price in 2017 was 17.7 percent higher than the median price of $248,950 in 2013 – an average annual increase of 3.3 percent.

ix. Protected Class Status and Housing Problems

Based upon the definition of disproportionate greater need, as defined by HUD, The Comprehensive Affordability Housing Strategy (CHAS) data was used to determine housing problems as they relate to protected class status, race and ethnicity specifically.

The CHAS was used to assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. HUD defines disproportionate greater need when there is greater than a 10 percentage point difference between a racial group at an income level who experiences at least one housing problem and the total population in that income category experiencing at least one housing problem. Housing problems include a lack of complete kitchen facilities, a lack of complete plumbing facilities, overcrowding of more than one person per room, or a housing cost-burden).

The 2009-2013 CHAS data shows that disproportionate greater need amongst the income categories and race varies. Racial and ethnic minorities, such as Hispanics and Asians, show higher incidence of housing problems, specifically cost-burden, in comparison to non-Hispanic whites. The data does not show a significant disparity amongst Black/African American households. The percentage of disproportionate need exist within the 0-30 percent of AMI category and the 30-50 percent of AMI category.

According to the Housing Needs Assessment, the percentage of whites in comparison to other ethnic groups in the region is higher. The lower incidences of disproportionate greater need amongst other racial groups may be the result of an influx of White young, entry-level professionals, University of Virginia students and professors who select housing options in high cost areas of the region (City of Charlottesville). All of these scenarios would decrease the rate at which households experience a housing problem and could result in skewed data results.
Specifically, in the City, according to the Housing Needs Assessment, low-income African American and Hispanic households bear a disproportionate share of the burden of the lack of affordable housing. Census Tracts with a majority of non-white residents have significantly higher shares of households with cost burdens than do majority-white tracts.

The CHAS data also reveals a significant number of elderly homeowners with housing cost burdens. A total of 3,498 elderly homeowners pay in excess of 30 percent of income on housing, and almost half of the elderly homeowners pay in excess of 50 percent of income. The majority of these severely cost-burden elderly homeowners are at extremely-low to very-low income levels. All localities in the region offer property tax relief to elderly or disabled homeowners, however, the issue of maintaining payments on a home with a fixed income continues to persist for this demographic.

Many residents with a disability have special housing needs, which may limit the number of available units and exacerbate already high housing costs. The 2016 American Community Survey estimates that 9.8 percent of the population in the MSA has at least one disability. For people with disabilities, affordability tends to be the primary concern. Individuals and households are faced with the decision of finding less expensive housing in more rural areas, which can make access to services more difficult.

The 2017 and 2018 Point-in-Time Survey showed slight increase of the homeless population in the region over 2016, but the trend has been downward since 2010. The 2018 count identified that 30 percent of people reported a disabling condition and that African Americans are significantly over-represented in the region’s local homeless population as African Americans make up 46 percent of the total homeless population. Whites account for 52 percent of the population and 2 percent identify as “Other” or multiracial. People identifying as Hispanic/Latino are significantly under-represented in the homeless population, comprising 3 percent of the total homeless population.

Observation: Racial and ethnic minorities, such as Hispanics and Asians, show higher incidence of housing problems, specifically cost-burden (within the 0-30 percent and 30-50 percent of AMI category) in comparison to non-Hispanic Whites in the region. Specifically, in the City, low-income African American and Hispanic households bear a disproportionate share of the burden of the lack of affordable housing. Thirty percent of the region’s homeless population has a disabling condition and African Americans are significantly over-represented in the region’s local homeless population. Elderly homeowners and residents with a disability also have difficulty finding housing that is accessible and affordable.

D. Review of Private Sector Practices

i. Mortgage Lending Practices
Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans
denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for the MSA is from 2016 and 2017. The MSA as it pertains to the HMDA data available includes Charlottesville, Albemarle, Fluvanna, Greene, Nelson, and Buckingham Counties [The HMDA MSA data excludes Louisa County which is a part of the TJPD and includes Buckingham County which is not a part of the TJPD]. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the MSA. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

a. Households by Race
The following table summarizes two years of HMDA data by race, ethnicity and action taken on the applications, with detailed information to follow.

| Table 22 - Summary Report Based on Action Taken Mortgage Data, 2016-2017 |
|-------------------------------------------------|--------|--------|--------|--------|--------|--------|
|                                                  | 2016   | 2017   | Change |
|                                                  | #      | %      | #      | %      | #      | %      |
| Applied for                                      | 1181   | 100%   | 1054   | 100%   | -127   | -10.8% |
| Black                                           | 122    | 10%    | 80     | 8%     | -42    | -34.4% |
| White                                           | 856    | 72%    | 790    | 75%    | -66    | -7.7%  |
| Asian                                           | 19     | 2%     | 20     | 2%     | 1      | 5.3%   |
| Hispanic*                                       | 34     | 3%     | 23     | 2%     | -11    | -32.4% |
| Other race                                      | 45     | 4%     | 37     | 4%     | -8     | -17.8% |
| No information/NA                               | 105    | 9%     | 104    | 10%    | -1     | -1.0%  |
| Originated                                      | 839    | 100%   | 751    | 100%   | -88    | -10.5% |
| Black                                           | 67     | 8%     | 46     | 6%     | -21    | -31.3% |
| White                                           | 631    | 75%    | 588    | 78%    | -43    | -6.8%  |
| Asian                                           | 8      | 1%     | 13     | 2%     | 5      | 62.5%  |
| Hispanic*                                       | 24     | 3%     | 16     | 2%     | -8     | -33.3% |
| Other race                                      | 35     | 4%     | 28     | 4%     | -7     | -20.0% |
| No information/NA                               | 74     | 9%     | 60     | 8%     | -14    | -18.9% |
| Denied                                          | 166    | 100%   | 110    | 100%   | -56    | -33.7% |
| Black                                           | 29     | 17%    | 13     | 12%    | -16    | -55.2% |
| White                                           | 103    | 62%    | 75     | 68%    | -28    | -27.2% |
| Asian                                           | 6      | 4%     | 1      | 1%     | -5     | -83.3% |
| Hispanic*                                       | 7      | 4%     | 3      | 3%     | -4     | -57.1% |
| Other race                                      | 6      | 4%     | 2      | 2%     | -4     | -66.7% |
| No information/NA                               | 15     | 9%     | 16     | 15%    | 1      | 6.7%   |
The most obvious trend in the 2016-2017 HMDA data for the MSA is the drop in the number of loan applications. The number of loan applications dropped by 127 (10.8 percent) from 2016 to 2017. At the same time, the share of Black applicants fell at a greater rate, 34.4 percent overall, suggesting that this protected class is proportionately less able to afford home ownership.

Over the course of the two years, the percentage of applications that resulted in loan originations decreased, a trend likely related to the decreasing number of total applications. The percentage of successful applications for White applicants increased from 75 percent to 78 percent, while the share of successful applications for Black applicants decreased from 8 percent to 6 percent. Proportions of originations for other racial groups held generally steady, or insignificantly increased or decreased.

The number of overall application denials decreased between 2016 and 2017. White applications made up a more substantial share of denials in 2017 – 68%, compared to 62 percent in 2016, while Black applications made up a smaller share of denials – 17 percent compared to 12 percent in 2016.

Geographically across the region, there is no clear pattern of mortgage denials per census tract relative to the impacted areas. The map of Mortgage Loan Denials suggests that the rate of denials is higher in the more rural, less populated areas of the region than for the urban areas. For the rural counties of Fluvanna, Greene and Nelson in the MSA, all areas had denial rates exceeding 15% with some areas at 25 to 30%. For the City of Charlottesville, there were no census tracts with rates exceeding 20%.

b. **Conventional Loans vs. Government-Backed Loans**

Loan types in 2017 included conventional loans and government-backed loans, including FHA, VA, and FSA/RHS. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand home ownership opportunities. In the HMDA MSA, 25 percent (1,039) of the households that applied for a mortgage loan applied for a government-backed loan.

The denial rates for government-backed loans were slightly lower than the denial rate for conventional loans, with the exception of FHA loans.

- The denial rate for FHA loans was 13 percent.
- The denial rate for VA-guaranteed loans was 8 percent.
- The denial rate for conventional loans was 10 percent.
- The denial rate for FSA/RHS loans was 9 percent.
c. **Denial of Applications**

Credit history, collateral and unsatisfactory debt-to-income ratios are the major reasons for denial of home mortgage applications throughout the MSA, as reported in the HMDA database.

The distribution of denials by race and ethnicity remained generally the same. Black households had higher denial rates, while denial rates for White households was lower. White households reported a denial rate of 9 percent, or 75 of 790 applications. Black households reported a denial rate of 16 percent, or 13 of 80 applications. This data is detailed in Table 23 and Map 6 and Map 7.

**Table 23 – Denials by Race and Ethnicity in the HMDA MSA, 2017**

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Total Application</th>
<th>Denied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>4</td>
<td>0.4%</td>
</tr>
<tr>
<td>Asian</td>
<td>20</td>
<td>2%</td>
</tr>
<tr>
<td>Hawaiian/Pacific Islander</td>
<td>2</td>
<td>0.2%</td>
</tr>
<tr>
<td>Black</td>
<td>80</td>
<td>8%</td>
</tr>
<tr>
<td>Hispanic**</td>
<td>23</td>
<td>2.3%</td>
</tr>
<tr>
<td>White</td>
<td>790</td>
<td>79%</td>
</tr>
</tbody>
</table>
Percentage of Mortgage Loan Denials by Census Tract in the Charlottesville Metropolitan Statistical Area - 2016

Impacted area defined as areas of racial or ethnic minority concentration where the percentage of a specific minority or ethnic group is 10 percent or more than in the City or County containing the area.

Charlottesville: 29.0%
Albemarle: 19.9%
Greene: 16.8%
Louisa: 26.2%
Nelson: 22.1%

*Impact Areas Shown in Census Block Group

Data Source: Home Mortgage Disclosure Act 2016 LAR file for Charlottesville MSA
https://www.ffiec.gov/hmda/hmdafiat.htm
Percentage of Mortgage Loan Denials by Census Tract in the Charlottesville Metropolitan Statistical Area - 2016

Impacted area defined as areas of racial or ethnic minority concentration where the percentage of a specific minority or ethnic group is 10 percent or more than in the City or County containing the area.

Charlottesville: 29.0%
Albemarle: 19.9%
Greene: 16.8%
Louisa: 26.2%
Nelson: 22.1%

*Impact Areas Shown in Census Block Group

Data Source: Home Mortgage Disclosure Act 2016 LAR file for Charlottesville MSA
https://www.ffiec.gov/hmda/hmdaflat.htm
OBSERVATION: In 2017, Black households had a higher rate of mortgage loan denials than White and Hispanic households. Black households had a denial rate of 16 percent compared to 9 percent for Whites and 13 percent for Hispanics.

For this analysis, lower income households include households with incomes between 0 percent and 80 percent of the median family income (MFI), while upper income households include households with incomes above 80 percent MFI. Applications made by lower income households in 2017 accounted for 60.7 percent of all loan denials though they accounted for only 6 percent of the total number of applications.

Table 24 – Denials by Income in the HMDA MSA, 2017

<table>
<thead>
<tr>
<th>Total Applications</th>
<th>Denials</th>
<th>Denial Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below 80% AMI</td>
<td>461</td>
<td>65</td>
</tr>
<tr>
<td>Above 80% AMI</td>
<td>571</td>
<td>42</td>
</tr>
<tr>
<td>Total</td>
<td>1032</td>
<td>107</td>
</tr>
</tbody>
</table>

Among all lower income applicants in the HMDA MSA, the denial rate was highest for minority households (with the exception of Asian households). Of the 68 lower income applications that were denied in 2017, 60 percent were submitted by White households, and 16 percent were submitted by Black households. The denial rate for lower income Black households was 19.3 percent, compared to 12.1 percent of lower income White households. No race information was provided for 16 percent of the applications.

Table 25 – Denials by Race for Lower Income Applicants in the HMDA MSA, 2017

<table>
<thead>
<tr>
<th>Total Applications</th>
<th>Denials</th>
<th>Denial Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black</td>
<td>57</td>
<td>11</td>
</tr>
<tr>
<td>White</td>
<td>338</td>
<td>41</td>
</tr>
<tr>
<td>Asian</td>
<td>14</td>
<td>1</td>
</tr>
<tr>
<td>Hawaiian</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Am. Indian/Alaska Native</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Not Provided</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>44</td>
<td>11</td>
</tr>
<tr>
<td>Hispanic*</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>472</td>
<td>68</td>
</tr>
</tbody>
</table>

*Hispanic Ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2017

Among applications submitted by upper income households, denial rates were lower for upper income households compared to lower income households. Of the 42 upper income applications that were denied, 81 percent were submitted by White households and 4.7 percent were submitted by Blacks households. For 11.9 percent of these applications, no
race information was provided. Black *upper* income households had a denial rate of 8.7 percent, which was higher than the denial rate for White *higher* income households at 7.5 percent.

<table>
<thead>
<tr>
<th>Race</th>
<th>Total Applications</th>
<th>Denials</th>
<th>Denial Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black</td>
<td>23</td>
<td>2</td>
<td>8.7%</td>
</tr>
<tr>
<td>White</td>
<td>452</td>
<td>34</td>
<td>7.5%</td>
</tr>
<tr>
<td>Asian</td>
<td>6</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Hawaiian</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Am. Indian/Alaska</td>
<td>2</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Native</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Provided</td>
<td>27</td>
<td>1</td>
<td>3.7%</td>
</tr>
<tr>
<td>N/A</td>
<td>60</td>
<td>5</td>
<td>8.3%</td>
</tr>
<tr>
<td>Hispanic*</td>
<td>12</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>582</strong></td>
<td><strong>42</strong></td>
<td><strong>7.2%</strong></td>
</tr>
</tbody>
</table>

*Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2017

**OBSERVATION:** Black lower and upper income households had a higher mortgage denial rate than the denial rate for White lower and upper income households in 2017. While this fact alone does not imply an impediment to fair housing choice, this trend is consistent with discrimination.

### ii. High-Cost Lending Practices

HMDA provides price information for loans considered “high-cost.” A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

An analysis of loans in the MSA by race and ethnicity reveals that out of 38 FHA loans in 2017, Asian applicants had a higher average of the number of percentage points above the average prime offer rate, and out of 23 reported conventional loans, Whites, had a higher
average of the number of percentage points above the average prime offer rate, with Blacks and Asians trailing behind.

Table 27 – High-Cost Mortgage Loans by Race and Ethnicity in the HMDA MSA, 2018

| Percentage Points Above Average Prime Offer Rate (Only Includes Loans with APR above the Threshold) |
|-------------------------------------------------|---------------------------------|---------------------------------|
|                                                  | FHA Loan Mean | VA Loan Mean | Conventional Loan Mean |
| American Indian/Alaska Native                     | 0             | 0             | 0                   |
| Asian                                            | 1.8           | 0             | 1.52                |
| Black or African American                         | 1.62          | 0             | 1.63                |
| Hawaiian                                         | 0             | 0             | 0                   |
| White                                            | 1.74          | 0             | 1.8                 |
| No Information/NA                                 | 1.92          | 0             | 0                   |
| Hispanic*                                        | 0             | 0             | 0                   |
| Total Reported                                    | 38            | 0             | 23                  |

*Hispanic ethnicity is counted independently of race

Source: Federal Financial Institutions Examination Council, 2017

E. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the region to determine opportunities for furthering the expansion of fair housing choice.

i. Public Housing

CRHA is responsible for management and operation of 376 public housing units – 371 in seven complexes as well as five units on scattered sites. Black households represent the majority of public housing residents. Of the 662 households in CRHA public housing communities from November 2016 through
February 2018, 77 percent of the head of households reported were black and 21 percent were white. Families with children comprised 47 percent of all households; individuals or families with disabilities comprised 41 percent. Public housing serves primarily extremely-low-income individuals and families and extremely-low income persons represent a larger share of households in the public housing.

**OBSERVATION:** Black households are far more likely to reside in public housing than any other race or ethnicity. This may indicate limited housing choice for LMI Black households.

CRHA administers 700 Housing Choice Vouchers that are funded by HUD. (Fifty-one of these vouchers are committed to units in Friendship Court). According to the Housing Needs Assessment, the extensive waitlist for public housing and housing choice vouchers is evidence of the overwhelming need for affordable housing in the City. The waiting lists maintained by CRHA for Housing Choice Vouchers and public housing included 1,866 households in July 2017. Excluding overlap caused by households on both lists, there are 1,651 unduplicated households. The waiting lists for Housing Choice Vouchers and public housing waiting list have been closed for years. With low levels of turnover, this represents an eight-year wait for a voucher or a seven-year wait for public housing though the wait is significantly shorter for elderly and disabled individuals.

**OBSERVATION:** Due to the extensive waitlist, there is a large need for additional assistance for housing choice vouchers.

Extremely-low income persons represent a larger share of households on the public housing and housing choice voucher waitlist. More than half of those applying for assisted housing were single persons. Three percent had six or more members – 55 families. On the public housing list, 113 applicants had elderly/disabled status, and 95 applicants were identified as homeless.

Due to program priorities, the waiting lists are heavily weighted toward extremely low-income households at less than 30 percent of AMI – 84 percent of voucher applicants and 80 percent of public housing applicants. Some applicants are on multiple lists including those of other jurisdictions. A recent analysis revealed that 305 or 68 percent of public housing applicants live or work in Charlottesville. Of the voucher applicants, 981 or 70 percent listed living or working in Charlottesville as their target funding/ preference.

Black households represent the majority of voucher holds. Of the 339 households with vouchers in October 2018, 90 percent (305 voucher holders) of the head of households reported were black and about 10 percent (33 voucher holders) were white. Smaller families make up the majority of all households; individuals or families with disabilities comprised 36 percent (123) voucher holders. Female-headed households represent 85% of all households.
OBSERVATION: Black households are disproportionately represented among rental voucher holders than any other households. Ninety-percent of voucher holders are Black. Female-headed households are also disproportionately represented amongst voucher holders, with 85% of all households being female-headed.

According to the Housing Needs Assessment, the age of CRHA housing is a major issue as many units are reaching the end of their useful lives. Inadequate funding through the last decades has challenged the Authority’s ability to maintain these units properly. Federal funding for public housing has not kept pace with routine maintenance needs, let alone the needs for modernization and replacement of older units. HUD’s capital program subsidy for both maintenance and modernization of all CRHA public housing was $483,486 in 2016 – a mere $1,285 per unit. The City is also setting aside $2,250,000 of Capital improvement Program funds between Fiscal Years 2018 and 2022 to support CRHA redevelopment efforts.

Historically, the Federal government has played a major role in funding housing for low-income households. However, the resources committed to support development of new housing have declined significantly. Charlottesville public housing was developed with Federal funding primarily. Funding to repair and/or replace aging public housing is very limited. CRHA received only $483,486 in capital funding in 2016 to maintain its 376 public housing units ($1,285 per unit), leaving virtually no money for renovation and modernization of units built 40 to 50 years ago. HUD funding for other new construction programs has declined as well. Households living in privately-developed housing funded through HUD programs increased only marginally from 1.34 million in 2007 to 1.37 million in 2016.

According to the CRHA, the needs which are most frequently expressed by public housing tenants and those on the waiting list for accessible units include units that are equipped with dwelling space to accommodate a live-in aid, one-level units that do not require residents to navigate steps, and units that are equipped with a walk-in bathtub.

OBSERVATION: There is a large need for redevelopment of public housing units. The CRHA residents have expressed the need for units that are accessible and accommodates the needs of elderly and/or disabled persons.

The majority of public housing units are distributed unevenly within the City with 60 units distributed in the northern area of the City (Michie, Madison, Elson), and the remaining 316 in the southern area of the City. Of the 720 Low-Income Housing Tax Credit units, 200 are located in the northern area of the City (Hearthwood Apartments), while the remaining 520 units are distributed in the south as illustrated on the map on the following page.
Public and Low Income Housing - 2018
Charlottesville, VA

Data Source: FBCI Table A-38 Charlottesville Low-Income Housing Tax Credit-Funded Developments, 2018
Residents who receive Housing Choice Vouchers from CRHA have the option to find housing in the City or anywhere in the U.S. Given the high rents prevailing in the City, many of the vouchers administered by CRHA are actually used to rent housing in surrounding counties and as far away as Richmond. Many of those used in the City are used in LIHTC buildings to lease units designated for households at up to 60 percent of AMI.

**OBSERVATION:** The distribution of assisted housing (including Public Housing and Low-Income Housing Tax Credit) units in the City are heavily concentrated in the southern area of the City. Many of the vouchers distributed by CRHA are used outside of the City due to high rents in the City.

Policy documents utilized by CRHA and the Albemarle County Office of Housing (ACOH) were reviewed for this analysis. A summary of the reviews of the administrative plans for both public housing and the Section 8 Housing Choice Voucher Program are included below.

**a. Public Housing Admissions and Continuing Occupancy Policy (ACOP)**

CRHA's non-discrimination Policy can be found in Section IA of the ACOP. The Housing Authority will not discriminate against any person or family because of race, color, creed, age, sex, religion, disability, national origin or familial status in any phase of the occupancy process. CRHA will not deny admission to an applicant or participant who is or has been a victim of domestic violence, or stalking, if the applicant otherwise qualifies for admission or assistance.

Section 1C describes CRHA's reasonable accommodations policy. Requests for reasonable accommodation from persons with disabilities will be presented to the staff person assigned to the applicant or resident who will process the request and seek verification of the need for the accommodation. The accommodation will be granted upon receipt of third party verification that the accommodation meets the need presented by the disability and does not result in substantial alteration of the program or create an undue financial or administrative burden on CRHA. Should the request be denied, an applicant may request an informal meeting to appeal the decision, and a resident may request a hearing under CRHA's Grievance Procedures.

Reasonable accommodations will also be made for persons with a disability who require an advocate, accessible offices or alternative locations for making application, including their home or a service Authority. A designee will be allowed to provide some information, but only with the permission of the person with the disability.
All CRHA mailings will be made available in an accessible format upon request as a reasonable accommodation. A reliable and knowledgeable professional will verify all requests for accommodations or modifications.

CRHA will make a reasonable effort to provide accessibility to individuals with long-term but temporary disability that limit their mobility or other major life activities. In such cases, their lease will specify that they will be required to relocate to another unit when the need for the accessibility features is no longer required. The temporary nature of the disability and the approximate length of time of disability will be verified through a qualified health or services professional.

Section 1D of the ACOP discusses policies concerning translation of documents. In determining whether it is feasible to translate documents into other languages or Braille for the blind, CRHA considers the number of applicants and residents who do not speak English and speak another language or need Braille for adequate understanding and the cost per client to translate the documents into another language or Braille. Also considered is the availability of translation and/or interpreter services in the City.

**OBSERVATION:** With an increase in the number of non-English speaking persons in the City, CRHA should consider the City’s four-factor analysis to determine if vital documents should be translated.

Documents intended for use by applicants and residents will be made available in formats accessible to those with vision or hearing impairments. Equally important, the documents will be simply and clearly written to enable applicants with learning or cognitive disabilities to understand as much as possible. Sign language interpreters may be provided for hearing-impaired applicants/residents if requested as a reasonable accommodation. For applicants/residents unable to read, intake/occupancy staff will read and explain orally anything they would normally hand to an applicant/resident to be read or filled out. Staff will assist in completing forms and other required documents for persons unable to write but will do so in contrasting ink to clearly delineate staff entries to application. At a minimum, CRHA prepares the following information in a clearly written and accessible format: marketing and informational material; application process information and the application form; all form letters and notices to applicants/residents; general policy regarding reasonable accommodation; new resident orientation materials; the lease and any applicable house rules; guidance/instructions on care of the housing unit; information on opening, closing and updating the waiting list; and, all information related to applicant/resident rights (informal/formal hearings, grievance procedures, etc.).

An applicant for public housing must qualify as a family. HUD defines a family as a single person or a group of persons including elderly, disabled, and displaced families and persons living with one or more live-in aides (eligibility for live-in
Aides are to be reviewed and approved by management. A group of persons is defined by CRHA as two or more persons who intend to share residency whose income and resources are available to meet the family’s needs and will live together in public housing. This means that two or more near-elderly persons (55 years of age and older) living together, or one or more near-elderly persons living with one or more live-in aides are eligible for admission.

Section 8 of the ACOP explains CRHA’s local preferences used to select among applicants on the waiting list. CRHA will select and house residents in accordance with the following preferences:

- Preference to families having certain characteristics;
- Preference based on local housing needs and priorities as determined by the CRHA using generally accepted data sources, waiting list, public comment on the CRHA’s Annual Plan, and requirements of the Consolidated Plan;
- Matching of characteristics of an applicant family with the type of unit available;
- Selection of a family with household members who are disabled and give preference by assigning a unit with the special accessibility features needed by those family members;
- Preference to elderly and/or disabled families for units in a public housing mixed population (formerly designated elderly) developments;
- Preference to applicants living and/or working in the CRHA’s jurisdiction.

Service animals for the disabled are allowed in any unit and are excluded from the size, weight, type and non-refundable fee requirements pertaining to ownership of service animal. Residents needing a service animal must provide verification for the need and verification that the animal is considered to be a service animal.

In December 2012, the CRHA approved the No Trespass Authority Administrative Policy #1002. The CRHA seeks to eradicate criminal activity, including but not limited to, illegal drug activity on its properties. The policy establishes that all sites are closed to public use and travel. CRHA’s private streets, sidewalks, and parking lots within the agency’s ownership, maintenance, dominion and/or control shall only be accessible to lawful residents of CRHA and individuals with a legitimate reason to visit, which shall include invited guests, or individuals present on official CRHA business and/or to provide approved services to residents. The policy outlines the scope of authority that the Charlottesville Police may follow.

b. Section 8 Housing Choice Voucher Program Administrative Plan

Chapter 1, Section I of the Housing Choice Voucher/Section 8 Administrative Plan includes CRHA’s fair housing policy. The list of protected classes includes race, color, sex, sexual orientation, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability. As a matter of policy, civil
rights and fair housing information and discrimination complaint forms are provided to clients during the family briefing session and as part of the voucher holder’s briefing packet and will be made available upon request. Chapter 1, Section 9 of the County of Albemarle’s Office of Housing (ACOH) Housing Choice Voucher Administrative Plan also outlines the fair housing policy which is similar to the CRHA’s policy.

All CRHA and ACOH staff members are required to attend fair housing training sponsored by HUD and other local organizations. In addition, fair housing posters are displayed in their office and interview rooms and all outreach mailings contain the equal opportunity logo.

Chapter 1 includes a statement that CRHA and ACOH pledges that no individual with disabilities will be denied the benefits of be excluded from participation in, or otherwise be subjected to discrimination because CRHA’s facilities are inaccessible to or unusable by persons with disabilities.

In order to ensure reasonable accommodation, CRHA and ACOH includes as its policy the opportunity that a participant with a disability to ask for specific changes to policy or practice as an accommodation of their disability. The CRHA will verify disabilities under definitions in the Fair Housing Amendments Acts of 1988 [42 USCS 3602], the 1973 Rehabilitation Act [29 USCS 701 et seq.] and the Americans with Disabilities Act [42 USCS 12101]. Unless it has been determined that the accommodation would present an undue financial burden to CRHA, the CRHA will obtain verification that the person needs the specific accommodation due to their disability.

The CRHA and ACOH will determine whether the accommodation is required for an individual to have equal access to the housing program. The CRHA will then provide a written decision to the person requesting the accommodation within 21 calendar days. The ACOH will provide a written decision within a reasonable time (does not explicitly state the number of days. This written response shall accept the accommodation, suggests an alternative accommodation, and/or deny the accommodation.

In applying for participation in the HCV program, a disabled person may request alternate formats or methods of delivery of the necessary information. The CRHA will provide translations of documents in other languages where feasible using certain factors such as number of applicants and participants in the jurisdiction who do not speak English and instead speak the other language, estimated cost, and availability of translation services.

Chapter 3 of the CRHA Admin Plan and Chapter 2 of the ACOH Plan states that any family asking to be placed on the waiting list for HCV rental assistance is given the opportunity to complete an application. The applicant must qualify as a Family. A Family may be a single person or a group of persons. A “family” includes a family with or without a child or children. A group of persons
consisting of two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides is a family. The CRHA and ACOH determines if any other group of persons qualifies as a “family.” A family also includes: (1) two or more persons who intend to share residency whose income and resources are available to meet the family’s needs or (2) two or more elderly or disabled persons living together, or one or more elderly, near elderly or disabled persons living with one or more live-in aides.

The CRHA and ACOH accepts applications only from families whose head or spouse is at least 18 years of age or emancipated minors under State law. To be eligible for participation, an applicant must meet HUD’s criteria, as well as any permissible additional criteria established by the CRHA.

When vouchers are available, families are selected from one single waiting list in their determined sequence, regardless of family size. Depending on the composition of the waiting list, CRHA may only accept applications from families who claim certain preferences. All selections for vouchers are subject to income targeting requirements (hereinafter the “income target”) that at least 75 percent of Section 8 admissions are at or below Extremely Low Income levels currently at 30 percent of median income. When funding is available, families will be selected from the waiting list in their determined sequence, regardless of family size, provided that all selections combined meet the income target. This is similar for the ACOH.

Chapter 4 defines the waiting list local preferences that CRHA has adopted. The six local preferences for placement on the waiting list include the following:

- Families who live, work or have been recently hired to work in the City (ACOH has a similar preference for persons for families who live and work in the County).

Additionally, CRHA provides vouchers through two HUD programs that are targeted to special needs: Mainstream for Persons with disabilities and Welfare to Work. Qualified families for these programs are taken off the existing waiting list and provided with vouchers. ACOH has targeted funding programs for the Family Unification Program.

Chapter 5 states that CRHA and ACOH may approve an exception to the number of bedroom subsidy standards if it determines the exceptions are justified by the relationship, age, sex, health, or disability of family members or other individual circumstances. CRHA will also grant an exception upon request as an accommodation for persons with disabilities. Circumstances may dictate a larger size than the subsidy standards permit when persons cannot share a bedroom because of a medical need, a health reason, or other good cause.

Chapter 13 includes the option of portability of a voucher to a residence
outside the City. During the first year of tenancy, a family who moves due to education, job training, employment or other justifiable familial reasons may also take the voucher with them. ACOH has a similar policy.

Chapter 18 states that complaints filed by voucher holder, owners, employees, or the public are referred to either the Rental Office Staff or the Rental Office Department Supervisor. Any applicant or participant who feels that he or she has been treated unreasonably is entitled to an informal review. A notice of the findings of the informal review is provided to the appellant in writing. CRHA and ACOH must always provide the opportunity for an informal hearing before terminating assistance.

When CRHA or ACOH denies placement on the waiting list or terminates assistance, the family must be advised that the presence of a disability may be treated as a mitigating circumstance during the hearing process.

ii. Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The City of Charlottesville and the Thomas Jefferson Planning District’s federal entitlement funds received from HUD are used for a variety of activities, as follows.

- **Community Development Block Grant (CDBG):** The City receives CDBG entitlement grant funds on an annual basis. The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide variety of activities, including: housing rehabilitation, homeownership assistance, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses, and more

- **HOME Investment Partnership Program (HOME):** The Thomas Jefferson Planning District receives HOME entitlement funds on an annual basis. The member governments of the Thomas Jefferson Planning District agreed on an equal share basis of HOME program funds available to each participating government (with towns included with their respective counties) with the exception of 15 percent of the total HOME funds, which are reserved for the Community Housing Development Organization (CHDO) set aside. The CHDO funds are rotated among the participating
localities. The City of Charlottesville has been designated the lead agency for the HOME Consortium and the TJPDC the designated Program Manager for the Consortium. The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership for low and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

In FY 2019, the City of Charlottesville and the Thomas Jefferson Planning District anticipates receiving HUD entitlements in the amount of about $408,417 (CDBG) and $624,013 (HOME). Funds are used to benefit primarily low-income persons throughout the City and the region for HOME funds. Specific housing goals and objectives identified in the 2018-2022 Consolidated Strategic Plan are as follows:

- Preserve Existing Supply of Affordable Housing through rental rehab, homeowner rehab, tenant-based rental assistance, and public facility or infrastructure activities.
- Expand the Affordable Housing Stock through the construction of rental and homeowner units, housing for the homeless, and public facility or infrastructure activities.
- Strengthen and Support Homeownership for First-time Homebuyers through direct financial assistance to homebuyers.
- Ensure Housing is Accessible for All Residents through homeowner and rental unit rehab, and public service activities.
- Support Investments that Promote Sustainability, Energy Efficiency, and Environmental Stewardship through public facility or infrastructure activities.
- Support Homeless and Transition to Independence through homeless prevention activities and public service activities.
- Support Programs that Aid in Increasing Self-Sufficiency through public service activities.
- Enhance and Improve Access to Neighborhood Amenities and Infrastructure in Low/Moderate (income-eligible neighborhoods) through public facility or infrastructure activities.
- Support Investments that Aid in Fair Housing Choice public service activities.
- Foster Small and Local Business Development through business assistance.
- Support Programs that Provide Mental Health and Substance Abuse Services through public service activities.
iii. **Appointed Boards and Commissions**

A community’s awareness and sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community’s commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

a. **Planning Commission**

The City’s Planning Commission is comprised of seven members, appointed by the City Council to advise on all phases of city planning. Members provide guidance and recommendations on the City’s Comprehensive Plan and on matters related to zoning, special use permits, site plans, subdivision control, and other related planning issues.

Of the seven appointed members, two are Black and five are White. There are three females and five males. None of the members indicated a disability, and four live in a household with children under the age of 18.

b. **Board of Zoning Appeals**

The Board of Zoning Appeals is a five-member quasi-judicial body who are sworn in by the Circuit Court charged with the responsibility of hearing and deciding appeals from any decision or determination made by a zoning administrator and to authorize variances from the laws set forth in the Zoning Ordinance.

Of the five appointed members, with three alternates, all members are White and there are two females and the remaining members are male. None of the members indicated a disability. There is no information available about persons who have children under 18.

Aggressive attempts should be made to appoint persons with disabilities, families with children, and to promote diversity on the boards. There should be diversity in representation of citizens of the community including lower income, racial and ethnic groups and gender categories.

Observation: There is a lack of diversity and persons with disabilities on selected boards and commissions in the City compared to the majority. The experiences and perspectives of members of the protected classes would enhance the decision-making process in the City and offer the opportunity for advancing fair housing choice in all aspects of City government. Also, more information should be collected during the application process.
iv. **Language Access Plan for Persons with Limited English Proficiency**

The City has a Language Access Plan (LAP) which aims to enhance services offered to persons with LEP. As stated previously, there are more than 1,000 speakers of Spanish or Spanish Creole and Chinese who speak their native language, however, more than half speak English very well. As a result, the City is not required to translate vital documents. While no written translation is required, the City shall provide oral interpretation when requested by applicants/participants of its programs.

**Observation:** Provided that data is available annually, the City and Thomas Jefferson Planning District should ensure that the Language Access Plan is updated on an annual basis provided that the data is available.

v. **Zoning Regulations**

In Virginia, as in most states, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits.

Every jurisdiction in the Thomas Jefferson Region uses land use ordinances of various kinds to ensure that future development happens according to the vision expressed by the community. The ability to shape growth with such tools has long been recognized as the prerogative of localities, as they seek to protect the health, safety, and welfare of their citizens, as long as state codes and regulations are not violated in the process. Although there are many costs and benefits to weigh when evaluating existing or proposed land use codes, the impact of regulations on housing affordability and availability of diverse housing types is of primary importance to fair housing choice.

The zoning ordinance for each locality in the Thomas Jefferson Planning District was reviewed as part of the analysis for the 2010 AI. Since few amendments were adopted relative to the sections described below, much of the previous analysis is restated. Where revisions have been made since 2010, they are noted.

The review was based on topics raised in HUD’s Fair Housing Guide, which include:

**a.** The opportunity to develop various housing types (including apartments and housing at various densities)

**b.** The opportunity to develop alternative designs (such as cluster developments and planned residential developments)

**c.** The treatment of mobile or modular homes

**d.** Minimum lot size requirements
e. Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts

f. Restrictions on the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms.

a. Date of Ordinance
Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

Although many of the district’s codes were adopted in the 1960s and 1970s, all of the codes have been updated within the last two years. This demonstrates an effort to modernize the ordinance with newer land uses, more innovative planning concepts, and modifications to a changing society.

b. Residential Zoning Districts and Minimum Lot Sizes
The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and permitted housing types. However, the number of residential zoning districts is indicative of the municipality’s desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities.

In 2003, the City of Charlottesville updated a new zoning code with many changes intended to concentrate new growth in areas equipped to receive it. Mixed-used corridors were created throughout the city to allow commercial and residential uses to exist side-by-side or in the same structure. The new codes also allowed for smaller-scale infill in neighborhoods around the City by granting some flexibility to setback and lot size requirements.

Especially around the University of Virginia, the zoning codes facilitated the development of many multi-family units that have likely had an impact on the pressure that students exert on the supply of rental housing in the City. The new codes have likely impacted the growth rate of the City since their adoption. While many had declared Charlottesville to be a “built out” community in the past, the increase in housing supply through infill has increased the options available to residents of the region. Discussions with stakeholders have revealed
that options for University Students have expanded, however, options for families in the City still remain in demand.

There are 11 residential districts including four categories that are primarily for single-family dwellings. The lot size dimensions are as follows:

<table>
<thead>
<tr>
<th></th>
<th>Single-Family Detached (SFD)</th>
<th>Single-Family Attached (SFA)</th>
<th>Two-Family (TFD)</th>
<th>Townhouse (TH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R-1</td>
<td>8,125 SF min.</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>R-1S</td>
<td>6,000 SF min.</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>R-1U</td>
<td>8,125 SF min.</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>R-1US</td>
<td>6,000 SF min.</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>R-2, R-2U, and McIntire/5th St. Res. Corridor</td>
<td>6,000 SF min.</td>
<td>Per dwelling unit:</td>
<td>7,200 SF, min.</td>
<td>2,000 SF, min.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2,000 SF, min.</td>
<td>6,000 SF, min.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3,600 SF, avg.</td>
<td>for lots of record prior to 08/03/64</td>
<td></td>
</tr>
<tr>
<td>All other districts</td>
<td>6,000 SF min.</td>
<td>Per dwelling unit:</td>
<td>7,200 SF, min.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2,000 SF, min.</td>
<td>6,000 SF, min.</td>
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<td></td>
<td></td>
<td>3,600 SF, avg.</td>
<td>for lots of record prior to 08/03/64</td>
<td></td>
</tr>
</tbody>
</table>

*Note: R-2 dimensions can vary depending upon what is being built.*

The City also has a mixed use zoning district with 14 corridors. The mixed using zoning district allows for commercial and residential uses, which supports the creation of housing among uses with jobs and services. Residential density is calculated using the area of the entire development site and will vary.

Albemarle County has utilized their Neighborhood Model to guide the design and siting of development in the growth areas of the county. After many years of focusing efforts to protect the rural areas of the county on controlling growth, the county determined in the mid-1990's that enhancing the desirability of the growth areas was just as important to meeting the goals of their Comprehensive Plan. The model has many provisions that benefit households from across the socio-economic range. The Neighborhood Model encourages walking, biking, and public transportation (all generally low-cost mobility options), varying degrees of density, and a mix of housing options “so that the full range of housing choices is offered within the neighborhood.” Albemarle County has seven residential categories including a village residential category. The County also allows for mixed-use in certain districts such as the Neighborhood Model District.

Fluvanna County has four residential districts. A variety of residential uses are allowed in the R-2 – R-4 residential districts with lot sizes ranging from 15,000
square feet through 87,120 square feet lot size minimums. As described below, in Fluvanna County the PUD model aims to provide a mix of housing options and principles of new urbanism.

c. Alternative Design

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. In many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for lower-income households.

The City and Albemarle County’s Zoning Ordinance allows for the development of Planned Unit Development, referred to as PUD. In the City, there are no PUD density limitations. In Albemarle County, PUDs cannot exceed 35 dwelling units per acre. In Fluvanna County, PUDs serve as an alternative design with new urbanism principles.

d. Permitted Residential Types

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

The City’s Zoning Ordinance permits an assortment of residential types including single-family detached, two-family attached, townhouses and multi-family dwellings supporting varied housing choice by diverse households in the community. In the City single-family attached units are permitted in all zoning districts except all R-1/single-family residential categories. Multi-family and townhouse units are only permitted, by-right, in R-3 or medium density residential areas, University medium and high density areas, and McIntire-5th street residential areas.

The restrictions on mobile homes created as a result of the Zoning Ordinance’s definitions do not specifically impede housing choice by members of the protected classes. However, the restrictions placed on mobile homes may disproportionately impact members of the protected classes. Both the City and Albemarle County’s Zoning Ordinance defines a “manufactured home” (most commonly known as a mobile home) as a structure constructed to federal standards, as transportable in one or more sections, and, which is built on a permanent chassis and designed for use as a dwelling, with or without a permanent foundation, when connected to the required utilities. The term includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure.
The City’s Zoning Ordinance only permits placement of manufactured homes in Manufactured Home Park (MHP) Residential Districts. The minimum manufactured home dimension is 30 feet. Albemarle permits manufactured homes in residential districts by special use permit and must be located in a manufactured home lot, however, in an effort to provide affordable housing for all residents, the County permits manufactured homes to be situated on individual lots in certain districts. Manufactured homes for rent in an approved manufactured home park shall be considered rental units under certain residential uses provided they qualify as affordable housing under the HUD Housing Choice Voucher Program. Manufactured home parks are also permitted in Fluvanna County.

e. Definition of Family
Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

Every jurisdiction in the region limits occupancy of residential units to protect health and safety and preserve the character of neighborhoods. A single housing unit may be occupied by a “housekeeping unit,” which is defined as a family or a limited number of unrelated individuals. All jurisdictions in the region recognize a family, either biologically related or through legal adoption, as a housekeeping unit, but there are various ways of treating households of unrelated individuals in local ordinances. The following table outlines ordinances, either zoning, building, or health related, that impact occupancy levels throughout the region.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Selected Restrictions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albemarle County</td>
<td>No more than 6 unrelated persons (does not apply to R-1, R-2 and R-4 residential districts)</td>
</tr>
<tr>
<td>City of Charlottesville</td>
<td>For most zones, no more than four unrelated persons. For zones near the University, no more than three unrelated people.</td>
</tr>
<tr>
<td>Fluvanna County</td>
<td>Family defined as two (2) or more persons related by blood, marriage, adoption, or guardianship, plus not more than (2) unrelated persons living together as a single housekeeping unit in a dwelling or dwelling unit OR a group of not more than four (4) persons not related by blood, marriage, adoption or guardianship living together as a single housekeeping unit in a dwelling or dwelling unit.</td>
</tr>
<tr>
<td>Greene County</td>
<td>Family defined as one or more persons occupying a premises and living in a single dwelling unit, as distinguished from an unrelated group occupying a boarding house, lodging house, or motel or hotel.</td>
</tr>
<tr>
<td>Louisa County</td>
<td>Family defined as not more than four unrelated persons. Accessory Apartments are limited to no more than one family (as defined) or up to three unrelated persons. For A-1, A-2, R-1, R-2 and RD (Permitted); C-1, C-2 and IND (CUP).</td>
</tr>
<tr>
<td>Nelson County</td>
<td>Family defined as one (1) or more persons occupying a premise and living in a single dwelling unit, as distinguished from an unrelated group occupying a boardinghouse, hotel, or motel.</td>
</tr>
</tbody>
</table>

Limiting a family to not more than two, three or four unrelated persons within certain zoning districts can potentially impede the creation of homes for occupancy by groups of unrelated individuals, particularly the disabled. Part of the definition, however, advances non-traditional families and supports the blending of families who may be living together for economic purposes that limit their housing choice.

### f. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes in violation of the Fair Housing Act.

The City and Albemarle County similarly defines a residential treatment facility as a residential facility in which no more than eight persons reside, together with one or more resident counselors or other resident staff person(s). The zoning ordinance does not place any restrictions on the location of dwellings that are occupied by a group of disabled persons. Two primary purposes of a group residence are normalization and community integration. The City’s zoning ordinance requires a special-use permit for residential treatment facilities occupied by more than eight persons. The County’s zoning ordinance states that conditions may be imposed on such homes to insure their compatibility with other permitted uses, but such conditions shall not be more restrictive than those imposed on other dwellings in the same districts unless such additional conditions are necessary to protect the health and safety of the residents of such homes. Larger group residences are not typical because once occupancy reaches ten it starts to function as an institutional use, thereby defeating the primary purposes of a group residence. By allowing group residences throughout the community in agreement with the same standards as
applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded.

g. Homestay Regulations

For the City, the largest zoning code change since 2011 has been the homestay regulations (also known as “short-term rentals”). The City defines homestay as a home occupation in which an individual who owns a dwelling and uses it as his or her permanent residence within a dwelling hires out, as lodging. A homestay is considered a provisional use permit that have a variety of regulations. Homestay permits are allowed by-right in all residential categories except manufactured home parks.

According to the Housing Needs Assessment, in the City, more than 200 year-round housing units have been diverted to short-term transient rentals through Airbnb and other leasing services. The Airbnb site, which offers housing for short-term rentals, revealed 213 listings in the city limits for:
• 45 rooms within houses;
• 77 apartments or complete suites; and
• 91 houses, including 6 specifically focused on UVA graduation weekend.

While a number of these listings are for units within people’s homes or are occasional weekend rentals, others represent a diversion of housing units from the private housing market of monthly rentals to transient housing, acting as hotel rooms. These units represent 1.1 percent of the City’s total housing stock.

The City’s housing supply is limited by its small geography and built-out nature. The City’s high rental housing occupancy rates are well above the levels typically associated with a housing market in balance. Few significant vacant parcels are available for new residential development, and the existing supply is reduced by conversions to transient housing as apartment and house owners divert existing housing from year-round rentals to short-term rentals through Airbnb and other leasing services, in order to earn higher returns. In general, short-term rentals are known to impact the housing market which often times cause rents to increase, and in some cases, can contribute to the gentrification of predominately minority neighborhoods.

h. Accessory Dwelling Units

More intensive use of land in existing single-family neighborhoods could expand the supply of housing and help to meet the demand for close-in housing in a walkable environment. Accessory Dwelling Unit (ADU) regulations allow development of a second unit on the lot of an owner-occupied single-family detached house. However, restrictions limit the usefulness of the ADU provision by limiting the size of the ADU, the percent of the lot that can be occupied by an ADU and limiting its occupancy to no more than two people. Allowing construction of more than one unit could make better use of large lots, and allowing development of for-sale units would help to meet the demand from first-time homebuyers.

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Some moderate- to middle-income homeowners use Accessory Dwelling Units to help pay their own mortgages. Others who lack the financial resources to construct a second unit could benefit from access to construction financing in exchange for a commitment to rent the new unit at an affordable rent.

vi. **Affordable Housing Policy, Programs and Recommendations**

a. **Affordable Housing Policy**

i. **City of Charlottesville Affordable Dwelling Unit Ordinance (ADU)**
   In an effort to increase the supply of affordable housing, in the City, upon approval of a rezoning or special use application approving a residential project, or the residential portion of a mixed-use project with a density equal to or greater than 1.0 floor-area ratio (FAR), or an equivalent density based on units per acre, an applicant must provide on-site affordable dwelling units as part of the project. As an alternative, affordable dwelling units at an off-site location in the City can be provided. An additional alternative is that the developer provide a cash contribution to the City’s affordable housing fund. One of the major critiques of the ADU ordinance is that many developers opt into the alternative of providing a cash contribution instead of providing the units. Due to State law, the City cannot require the developers to build units. To date, the City’s Affordable Dwelling Unit Ordinance has resulted in more than $1.8 million being contributed to the CAHF and 14 homeownership ADUs being provided, with an additional five rental ADUs in the pipeline.

ii. **City of Charlottesville – Expedited Review Process and Fee Waivers**
   The City also has an expedited review process for projects that include affordable housing. In June 2017, the Charlottesville City Council approved developer fee waivers for private market developers providing on-site affordable housing units in developments that trigger the City’s Affordable Dwelling Unit Ordinance requirements.

iii. **City of Charlottesville’s Strategic Investment Area and Form-based Code**
   The City adopted the Strategic Investment Area (SIA) Plan in February 2014. The Plan was developed, through a community process, to provide guidance for: future redevelopment and investment in the area; improvements to affordable housing, including existing public and assisted housing; improved connections throughout the area; and recommended strategies for expanding employment opportunities within an area south and east of downtown.

   The drafting of a form-based code has started with the first of three phases in the SIA. In addition to hiring staff, in January 2017, City
Council approved allocating $1.25 million over the next five years to support implementing the SIA Plan. The City is currently working with Form Based Code Institute (FBCI) to prepare a form-based zoning code for Phase 1 of the Strategic Investment Area that will include incentives for inclusion of affordable housing units in new developments. An additional financial analysis has been completed to inform the Form-Based Code and other planning efforts. A key element of the Form-Based Code is the provision of additional building height in exchange for the development of affordable housing units.

iv. **County of Albemarle – Resolution in Collaboration with Habitat for Humanity**

In 2016, the Albemarle County Board of Supervisors passed a resolution backing the County’s collaboration with Habitat for Humanity of Greater Charlottesville as it redevelops Southwood Mobile Home Park. The resolution recognized that the Southwood redevelopment project represents an essential public/private partnership opportunity consistent with the Comprehensive Plan and the County’s broader strategic goals and that the redevelopment of Southwood was in accordance with the core values of non-displacement and sustainability, and could serve as a blueprint for future revitalization and redevelopment of the County’s aging suburban infrastructure. The County of Albemarle received two planning grants funded through CDBG to assist Habitat for Humanity in community organizing and developing plans for the first phase of the Southwood redevelopment. An action plan has been developed with steps leading to construction beginning in late 2019. The Board of Supervisors also committed to investing $675,000 in the predevelopment work.

v. **TJPDC Regional Housing Partnership**

The TJPDC has been working with local housing partners and coalitions to launch a Regional Housing Partnership (RHP) and conduct a Regional Housing Study. TJPDC is committing staff time toward the project and partnering with Albemarle County and the Virginia Housing Development Authority (VHDA) to fund and carry out the study. The urban core will have more detail, but the study will cover all 6 jurisdictions in the planning district, including the Counties of Fluvanna, Greene, Louisa and Nelson. All local comprehensive plans are required to address housing, with minimum requirements set forth in the Code of Virginia. Not all localities currently meet this requirement, and the regional study will produce a chapter for each jurisdiction that can be inserted into the Comprehensive Plan. The process for the study will not just be data-
driven but will include conversations with jurisdictions to address issues and develop strategies.

The TJPD Commission has adopted the framework for the RHP and has appointed some of the voting members. The intent is for the RHP to include a cross-section of participants, while keeping the size manageable. Stakeholders would include developers, designers, affordable housing organizations, and citizens. Regular meetings are anticipated to begin early in calendar year 2019, with the RHP initially focusing on the Regional Housing Study and housing summits. TJPDC hosted an educational seminar on Opportunity Zones in August; both Charlottesville and Albemarle County had two census tracts each designated as opportunity zones. This is a mechanism to put private investments into a fund, providing tax breaks to investors, and funds for development. Regulations are not yet in place but are expected to be similar to New Market Tax Credits.

Albemarle County is focused on working with the RHP through the Thomas Jefferson Planning District Commission and have made a commitment to invest in the regional housing study commissioned by the TJPDC. Based on the proposed timeframe for this to be completed, the County anticipates applying the information from this work to begin considering updates to policies in early 2019.

vi. City of Charlottesville - Comprehensive Plan Updates
The Planning Commission is currently updating the Comprehensive Plan, which provides a vision for the City’s future growth and specific guidance on land use policies, development patterns, and infrastructure and public facility investments. Small Area Plans are then prepared to refine and detail the Comprehensive Plan for specific neighborhoods, corridors or sections of the city.

b. Affordable Housing Programs
i. Charlottesville Affordable Housing Fund (CAHF)
The CAHF was established in 2007 by the City of Charlottesville to provide a flexible funding mechanism for housing-related projects. The primary purpose of the CAHF is to provide financial resources to address the affordable housing needs of individuals and families who live or work in the City by promoting, preserving and producing quality, long-term affordable housing options; providing housing related services to low-income and moderate-income households; and providing support for non-profit and for-profit organizations that actively address the affordable housing needs of low- and moderate-income households.

The CAHF receives annual appropriations through the City of Charlottesville's Capital Improvement Program budgeting process.
with additional funding through developer cash contributions through the City's Affordable Dwelling Unit Ordinance, voluntary cash contributions made through developer proffers, and repayment of loans made through the CAHF. Since the fund's inception, the Charlottesville City Council has committed more than $16 million towards affordable housing in the City.

The amount of CIP dollars allocated to the CAHF has increased 43 percent since FY2008, from $1.75 million to approximately $2.5 million. Combined with the other CAHF Funding sources, the total amount of City dollars allocated to the CAHF exceeds $20 million. Of this amount, more than $16 million (or 98 percent of total CAHF allocations) have been directly invested in affordable housing projects, creating or preserving an estimated 807 units of affordable housing since FY2008.

**ii. Community Development Block Grant and HOME Investment Partnerships**

The City receives CDBG entitlement grant funds on an annual basis. The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate-income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses. Albemarle County also receives CDBG funds through the state.

The TJPD receives HOME entitlement funds on an annual basis. The member governments of the Thomas Jefferson Planning District agreed on an equal share basis of HOME program funds available to each participating government (with towns included with their respective counties) with the exception of 15 percent of the total HOME funds, which are reserved for the Community Housing Development Organization (CHDO) set aside. The CHDO funds are rotated among the participating localities. The City of Charlottesville has been designated the lead agency for the HOME Consortium and the TJPD the designated Program Manager for the Consortium. The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
iii. City of Charlottesville Design for Life Cville Program
Established in 2012, the City has a Design for Life Cville program which provides permit fee reductions for visitable and livable improvements in single family attached and detached homes in the City. The City also requires that any new housing assisted with financial or in-kind services from the City be built to the livable standard as defined in its Design for Life Cville program.

iv. City of Charlottesville Reduced Water and Sewer Connection Fee Program
The City of Charlottesville offers reduced water facility and sewer connection fees for affordable housing units that are occupied by persons with incomes less than 80 percent of the Area Median income.

v. City of Charlottesville Special Tax-Rate for Certain Energy Efficient Buildings
A special tax rate is available to qualified residential and commercial energy-efficient buildings.

vi. City of Charlottesville Real Estate Tax Relief for the Elderly or Permanently Disabled Program
The Real Estate Tax Relief for the Elderly or Permanently Disabled Program forgives a percentage of the real estate tax assessed during a given taxable year for homeowners must be 65 years of age or older or permanently disabled, with combined household incomes no greater than $50,000 and a net worth less than $125,000.

vii. City of Charlottesville Disabled Veterans Real Estate Tax Exemption Program
The Disabled Veterans Real Estate Tax Exemption Program is available for any Veteran who: has a U.S. Department of Veteran Affairs confirmed 100 percent service-related disability, owns the property for which they are seeking the tax exemption, and occupies that property as their primary place of residence. The tax exemption may apply to surviving spouses of disabled Veterans, under certain circumstances. In 2017, a total of 380 elderly/disabled and 10 Veteran households received an average of $1,299.38 of real estate tax relief and an average of $2,707.17 real estate exemptions per household respectively.

viii. City of Charlottesville Housing Affordability Tax Grant Program (CHAP)
Homeowners who do not qualify for these programs, may qualify for assistance through the CHAP. CHAP serves non-elderly/disabled households with annual incomes less than $50,000 and whose homes
are valued at less than $365,000. The Commissioner of Revenue mails application materials directly to all homeowners who may qualify for the CHAP grant. In 2017, a total of 707 homeowners received an average CHAP grant amount of $439.71 each.

ix. **City of Charlottesville Rental Relief Program for the Elderly or Permanently Disabled**

The Rental Relief Program for the Elderly or Permanently Disabled provides grants to qualifying renter households to help offset the costs of rental housing. To qualify, applicants must be 65 years of age or older, or permanently disabled, with combined household incomes no greater than $50,000 and a net worth less than $125,000. Assistance is provided as a grant with the grant amount based on the previous year’s total rent payments. The average grant amount awarded this fiscal year equals $607.24 per household.

x. **City of Charlottesville Supplemental Rental Assistance Program (CSRAP)**

The City allocated $900,000 for the Charlottesville Supplemental Rental Assistance program (CSRAP) funded by the CAHF. The CRHA has begun issuing the CSRAP vouchers and will continue to do so through FY 18/19.

xi. **County Housing Programs**

Fluvanna County, Greene County, Nelson County, and Louisa County do not directly administer housing programs, however, there are resources available that provide housing assistance services such as Skyline Community Action Partnership, Fluvanna/Louisa Community Foundation, and the Nelson County Community Foundation. Albemarle County administers the Housing Choice Voucher Program to help people secure rental housing and pay rental subsidy.

c. **Affordable Housing Policy/Program Recommendations**

i. **City of Charlottesville Comprehensive Housing Strategy**

The City of Charlottesville, in partnership with the Housing Advisory Committee (HAC) and resident advocates, is working to develop a comprehensive housing strategy for the City. Phase One of this work, a Housing Needs Assessment report has been completed. Data from this report, which identifies current and projected affordable housing needs in the City through the year 2040, as well as regulatory barriers (e.g., zoning ordinances, land use patterns and funding streams) inhibiting affordable housing creation and the ability to affirmatively further fair housing, will help inform City efforts related to: the development and
location of affordable housing opportunities, strategic awards of CAHF dollars, and creation of affordable housing related programs. The overall goals of the housing strategy are to 1) identify specific targets for affordable housing unit production and preservation based on household income, 2) identify specific regulatory tools and developer incentives to support and encourage the provision of new affordable housing units within the City, and 3) ensure equitable development throughout the City’s neighborhoods. Community engagement activities, with an emphasis on the participation of members from low-wealth communities, play a significant role in the formulation of this strategy.

ii. City of Charlottesville HAC Recommendations from the RCLCO Housing Study

The HAC is charged with providing City Council with recommendations regarding housing policy and affordable housing funding priorities; researches and discusses trends and ideas in affordable housing policy and provides implementation recommendations. The HAC has developed a list of policy recommendations for City Council which include amendments to the City’s zoning ordinance, creation of developer incentives to encourage affordable housing construction among private market developers, and implementation of programs to increase the number of affordable rental units within the City.

i. City of Charlottesville Housing Advisory Committee (HAC) Zoning recommendations from the RCLCO Housing Study

In November 2016, the HAC provided short-term, mid-term, and long-term recommendations for related to affordable housing. The recommendations below are specifically zoning recommendations:

**Short-Term Recommendations**

The majority of the recommendations related to the City’s zoning ordinance are activities the City either currently employs or is able to implement under Virginia Code but does not yet do so. Recommended changes to the current zoning ordinance to encourage the development of on-site affordable housing include:

- Density bonuses;
- Zoning modifications/allowances, such as smaller lot sizes;
- Allowing by-right increases in density for affordable units;
- Focusing mixed-use/mixed-income housing development in
priority neighborhoods; and
- Use of an Affordable Housing Overlay District.

While by-right density increases may require enabling legislation, the other recommendations can be considered for implementation immediately and incorporated into any zoning changes arising from the code audit. Several other recommendations, such as ensuring the expedited review process is working as intended and reviewing all zoning changes for impacts on affordable housing provision, should be ongoing processes to ensure current City code and any future amendments to the code do not create unintended barriers to affordable housing.

**Mid-Term Recommendations**

The mid-term recommendations for zoning ordinance amendments cover a variety of developer incentives to encourage the construction of affordable housing units. Recommended incentives include increases to minimum residential building densities in mixed-use districts, as well as the provision of extra floor area ratio for on-site affordable housing. The HAC also recommends off-setting the cost of structured parking to make the provision of on-site affordable units financially feasible, and waiving development fees for developments reserving at least 10 percent of residential units as affordable units.

One recommendation presented in the housing report, and that HAC members support, is the creation of an affordable/workforce housing program similar to Montgomery County, Maryland’s Moderately Priced Dwelling Unit (MPDU). Acknowledging that Virginia code does not support the creation of MPDUs, the HAC members believe a MPDU-type program has the potential to significantly increase the number of supported affordable housing units within the City. To that end, they recommend staff research possible structures of, and feasibility of implementing, a similar type of program for the City.

**Long-Term Recommendations**

In terms of legislative agenda items, the HAC recommends pursing enabling legislation to extend City property tax exemption and abatement programs to all residential property types, including properties that convert to residential use, as well as for implementing an inclusionary zoning (IZ) policy in the City. The IZ policy should include mandatory developer provisions of affordable housing set at a City defined percentage of overall housing units and affordable to City defined income bands. The HAC also recommends the City
pursue enabling legislation to increase the cash in lieu payment under the Affordable Dwelling Unit (ADU) ordinance from the current $2.205 per square foot of gross floor area to $4.41 per square foot of gross floor area. HAC members believe the higher dollar amount will discourage developers from opting for the cash lieu option and lead to an increase in the number of ADUs provided.

In November 2017, the HAC provided priority recommendations from the RCLCO housing study.

Waiving developer fees in exchange for the provision of affordable housing on-site – as with most good, the costs of producing a housing unit are passed on to consumers in the form of sale prices and monthly rents. And, as with most manufacturers, housing developers want to maximize their profits. Therefore, any costs a developer incurs during development will impact the price local households pay for their housing: the higher the costs to the developer, the higher costs of the housing. Waiving developer fees is one way to lower the costs of residential construction and make affordable housing development more feasible. The HAC recommends the City waive developer fees in one of the following scenarios:

a. for all developments providing a minimum of 15% (of total unit count) on-site affordable units; OR

b. for developments triggering the City's Affordable Dwelling Unit Ordinance that provide the required affordable units on-site.

HAC members have not identified any specific fees that could be waived; however, staff has reviewed the City's fee schedule and suggests the following fee waivers:

a. Site plan review fees, both preliminary and final; AND
b. Building permit fees.

Forgiveness of the above fees, combined with reduced water and sewer meter connection fees the City already offers for affordable units, will reduce the cost of construction by approximately $5,000 per unit.

Recommendations for Immediate Action
1. Prioritizing inclusion of affordable housing in City led development;

2. Instructing City staff, consultants, Planning Commissioners and other persons/parties involved in the development of a Form Based Code, to prioritize and maximize increase floor area ratio and other allowances as tools for increasing affordable housing development in the City; AND

3. Instructing City staff, consultants, Planning Commissioners and other persons/parties involved in code audits/zoning ordinance updates and other applicable policy updates, to prioritize all allowable land use/planning tools – including increased density – in order to stimulate affordable housing development.

Other recommendations include Identifying City-owned property for affordable housing development and sell/lease those properties to interested developers – such properties include vacant parcels with our without associated structures, and City owned/occupied buildings nearing obsolescence. Staff has begun identifying such properties, beginning with a list of vacant City-owned parcels in residentially zoned areas. Another recommendation includes, doubling the annual allocation to the Charlottesville Affordable Housing Fund (CAHF) – City Council has already taken the necessary steps to meet this recommendation. Last, creating a Comprehensive Housing Strategy.

F. Evaluation of Current Fair Housing Profile

This section provides a review of the past and current fair housing planning initiatives and the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

i. Existence of Fair Housing Complaints

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving
their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the Fair Housing Act. In Virginia, the Virginia Fair Housing Office within the Department of Professional and Occupational Regulation (DPOR) receives fair housing complaints. Fair housing complaints originating in the region since 2010 (immediately following the previous AI) were obtained and analyzed for this report.

As of July 23, 2018, a total of 40 complaints were filed by persons in the region over an eight-year period to DPOR and FHEO. Thirty-three of the 40 complaints have been closed due to “no violation” findings or other findings. Eight complaints were closed because DPOR or HUD did not have jurisdiction in the matters. Another 17 cases were closed administratively due to an uncooperative complainant, the complainant could not be located or the complaint was withdrawn. Eight resulted in no reasonable cause. One case resulted in a violation (reasonable cause) and another case resulted in HUD reactivation. Three complaints resulted in successful conciliation. In these cases, the following complaints were made:

- In Charlottesville, a Hispanic and African-American person with a physical disability filed a complaint against a landlord who was unwilling to make a reasonable accommodation.
- In Albemarle County, a person with children under 18 filed a complaint against a property manager who refused to rent and had discriminatory terms and conditions.
- In Charlottesville, a person with children under 18 filed a complaint against a property management company who had discriminatory terms and conditions.

There are two cases open in Fluvanna and Louisa that are currently open for investigation.

Locally, Piedmont Housing Alliance (PHA) provides fair housing services to residents in the region. PHA mostly receives complaints related to race, disability, language barriers and familial status (families with children). The City of Charlottesville’s Office of Human Rights began collecting data in 2014 and since then, there have been 39 complaint referrals made to PHA.
ii. **Patterns and Trends in Fair Housing Profile**

According to the National Fair Housing Alliance Fair Housing Trends Report for 2018, the majority of complaints nationwide in 2017 involved housing discrimination against people with disabilities. Fifty-six percent of all cases involved discrimination against a person with disabilities. It is important to note that discrimination on the basis of a disability is the easiest to detect. The second most reported type of housing discrimination was discrimination on the basis of race, with 18.5 percent of all cases involving racial discrimination.

iii. **Existence of Fair Housing Discrimination**

The City of Charlottesville and other municipalities within the HOME Consortium are not currently involved in any fair housing discrimination lawsuits.

iv. **Determination of Unlawful Segregation**

The City of Charlottesville and other municipalities within the HOME Consortium are not involved in any current or pending suits.

G. **Assessment of Current Fair Housing Programs and Activities**

i. **Progress since the 2011 AI**

Each year, the City and the HOME Consortium structures its entitlement programs in such a way as to promote access to fair housing, primarily through addressing the impediments identified in the 2011 AI. The City and the Consortium’s actions relevant to each impediment during 2013 – 2017, as reported by the City in the Consolidated Annual Performance and Evaluation Report (CAPER) for each year, are outlined in the following chart.
<table>
<thead>
<tr>
<th>Impediment</th>
<th>Description</th>
<th>Objective</th>
<th>Measurable Result</th>
<th>Responsible Parties</th>
<th>Accomplishments</th>
</tr>
</thead>
</table>
| Rental Affordability | Lack of rental units affordable to low income households; Increased competition for limited number of rental units | Increase the # of affordable rental units; Align costs of rental options with the distribution of incomes in the area | Smaller % of people with severe cost burdens; # of people receiving assistance; # of supported units | HOME Consortium, local governments, non-profit organizations | 2013:  
- Sixty-two households were provided affordable rental assistance through CDBG  
- Skyline Community Action Partnership (Greene County) purchased and renovated existing buildings into five rental apartments, with the project completed in May 2013 with three units occupied  
2014:  
- Eleven HOME rental units created  
- Completion a mixed income affordable rental apartments and Condos including eight duplexes a total of 66 units (Sunrise Park)  
- Completion of 27 senior housing units (Timberlake Place)  
- Completion of 27 rental units Low Income Housing Tax Credits (LIHTC) (Carlton Views)  
2015:  
- Completion of eight HOME rental units  
- Completion of 27 rental units Low Income Housing Tax Credits (LIHTC) (Carlton Views)  
- One transitional housing unit added for the homeless through CDBG (MACAA)  
- One public (housing) facility improvement for persons with special needs completed with CDBG (Arc of Piedmont)  
- The City provided three years of funding for five additional units at The Crossings at Fourth and Preston increasing the number of |
Permanent Supportive Housing units at The Crossings from 30 to 35

- Thomas Jefferson Area Coalition for the Homeless (TJACH) assisted 232 people with rental assistance support through prevention funds and 106 people through HUD-funded permanent supportive housing.

2016:
- One HOME rental unit created in Nelson County
- Two HOME rental units underway in Fluvanna County
- TJACH assisted 169 people with rental assistance support through prevention funds and 102 people with HUD-funded permanent supportive housing
- City Council approved the creation of a City-funded rental assistance program.
- City Council approved the creation of a landlord risk mitigation fund to encourage market rate landlords to offer affordable rental housing to low-income households.
- The Albemarle County Economic Development Authority (EDA) is providing Tax-Exempt Housing Bonds from the Virginia Housing Development Authority (VHDA) for a 96-unit rental project. The Board of Supervisors took action in September 2016 to authorize the bonds. The bonds were issued.

2017:
- The City rent relief program served 382 elder/disabled households
- The Charlottesville Supplemental Rental Assistance Program (CSRAP) has been allocated to the CRHA to provide rental assistance vouchers to households earning no more than 60 percent AMI who are 1) homeless, 2) enrolled in a family self-sufficiency program, or 3) a current applicant on the Charlottesville Redevelopment and Housing Authority’s (CRHA) Housing Choice Voucher Program
- The Charlottesvillle Landlord Risk Reduction Program was approved by City Council. The Program is designed to encourage private market landlords to provide affordable rental units for households receiving rental assistance. The financial assistance offered through the program off-sets the cost of unit repair due to significant tenant-caused property damage in return for the landlord re-renting the repaired unit to another rental assistance household. Both the CSRAP and Risk Reduction Program will support approximately 115 additional SAUs (79 households and 36 units respectively).
- The City of Charlottesville committed a total of $2.5 million dollars to support the Charlottesville Redevelopment and Housing Authority’s public housing redevelopment efforts beginning in budget year 2018.
- Piedmont Housing Alliance provides access to high-quality affordable housing for 248 renter households (550 people) in the City of Charlottesville at five affordable apartment communities (Monticello Vista Apartments, Virnita Court Apartments, Cynthia Apartments, Timberlake Place Apartments, and Friendship Court Apartments).
- Two (2) new affordable rental units in Fluvanna County are nearly complete.

<table>
<thead>
<tr>
<th>Regulatory Barriers and Community Resistance</th>
<th>Land use codes and ordinances affect availability and affordability of location-efficient</th>
<th>Revise ordinances that create barriers to housing affordability; Eliminate stigma attached to affordable housing and</th>
<th>Revisions to land use ordinances that allow greater flexibility to develop compact, mixed-use,</th>
<th>Local governments</th>
</tr>
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</table>

- City Council approved developer fee waivers for private market developers providing on-site affordable housing units in developments that trigger the City’s Affordable Dwelling Unit Ordinance requirements.
- A Request for Proposals for consultants to draft a form-based code was issued for the SIA. In addition to hiring staff dedicated to overseeing implementation of the SIA Plan City Council has approved allocating $1.25 million over the next five years to support implementing the SIA Plan.
- To address affordable housing needs throughout other areas of the
The City, the Housing Advisory Committee (HAC) developed a list of policy recommendations for City Council. The HAC’s recommendations included amendments to the City’s zoning ordinance, creation of developer incentives to encourage affordable housing construction among private market developers, and implementation of programs to increase the number of affordable rental units within the City.

- The City’s and HOME Consortium’s Affirmatively Furthering Fair Housing requirements has been postponed until October 2022. Therefore, the Analysis of Impediments to Fair Housing Choice (AI) is being updated, as a supplement to the Consolidated Plan which will analyze the data on housing, current policies, and fair housing activities undertaken in the region.
- The Planning Commission continued the Comprehensive Plan updates. The updates will be informed by the City’s affordable housing policy and program recommendations.
- The City’s Housing Needs Assessment (HNA) was completed along with a report to City Council. The assessment estimates that the City currently needs 3,318 new affordable units.
- The City of Charlottesville, in partnership with the HAC and resident advocates, is working to develop a comprehensive housing strategy for the City.
- The City continues to work with the FBCI to prepare a form-based zoning code for Phase 1 of the Strategic Investment Area that will include incentives for inclusion of affordable housing units in new developments.
- The Thomas Jefferson Planning District Commission (TJPDC) has been working with local housing partners and coalitions to launch a Regional Housing Partnership (RHP) and conduct a Regional Housing Study. The process for the study will not just be data-driven but will include conversations with jurisdictions to address issues and develop strategies.
<table>
<thead>
<tr>
<th>Discrimination in the Rental Market</th>
<th>Either overt or covert discrimination against renters on the basis of race and ethnicity, family status, and disability</th>
<th>Eliminate all discrimination in housing; Raise awareness of fair housing laws; Provide counseling and advocacy; test for discrimination</th>
<th># and resolution of complaints; # of people reached with fair housing activities; results from testing (if conducted)</th>
<th>Piedmont Housing Alliance, other non-profit organizations, local governments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2013:</strong></td>
<td>• Piedmont Housing Alliance (PHA) provided 90 people with fair housing counseling regarding information and advocacy for people experiencing housing discrimination or needing information on fair housing rights and responsibilities; of these, 30 were provided with complaint forms referred to HUD and/or the Virginia Fair Housing Office, and 3 filed complaints; and 23 people had their fair housing issues resolved through counseling and advocacy. PHA also conducted 24 education sessions for 418 people on fair housing rights, responsibilities, and recognizing housing discrimination.</td>
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<tr>
<td><strong>2014:</strong></td>
<td>• PHA provided 108 people with fair housing counseling regarding information and advocacy for people experiencing housing discrimination or needing information on fair housing rights and responsibilities. PHA also conducted 26 education sessions for 394 people on fair housing rights, responsibilities, and recognizing housing discrimination.</td>
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<td><strong>2015:</strong></td>
<td>• PHA provided fair housing counseling for 14 people and conducted 10 fair housing education sessions for 74 people.</td>
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<tr>
<td><strong>2016:</strong></td>
<td>• PHA provided information and counseling to 10 people and conducted 3 fair housing sessions with 56 attendees</td>
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<td><strong>2017:</strong></td>
<td>• Piedmont Housing Alliance conducted 4 Fair Housing Workshops attend by 31 participants. Fair Housing education materials were distributed 259 households. Twenty-nine VHDA Homebuyer Class participants were introduced to the Fair Housing Act and how and where to file a Fair Housing Complaint.</td>
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</table>
| High Debt-to-Income Ratios and Foreclosures | Whether through loss of income or adjustment of loan, homeowners are struggling to retain their home; foreclosures will likely continue | Prevent foreclosures from occurring; encourage loan work-outs; support banking legislation; provide financial counseling to prospective home-buyers | # of foreclosures prevented through assistance; reduced homeowner cost burden | Local housing counselors, Piedmont Housing Alliance, local governments, Legal Aid, other non-profit orgs | 2013:  
- PHA provided new housing counseling to 318 clients (171 home purchase, 54 Default, 93 rental); 96 participants in Homebuyer Education Class; 119 participants in financial capability classes; 5 homeowners in defaults were saved from foreclosure with counseling for modified mortgages; 15 VIDA participants, actively saving towards a goal and matching funds. Financial literacy and VIDA programs managed by both PHA, MACAA, and CALM.  
- The City, through the Coalition of Economic Opportunity continued its BankOn program to reduce dependency on payday and title lending in the low-income community 2014:  
- PHA worked with 318 new housing counseling clients for home purchase (171), foreclosure prevention (54), or rental/credit issues (93)  
- Skyline CAP served 142 households with both individual and group counseling. The one-on-one counseling served 98 with Rental, 2 Pre-Purchase, 16 Post-Purchase, 8 Mortgage Delinquency, and 5 Homeless and 12 attended group workshops. 2015:  
- PHA worked with 246 new housing counseling clients for home purchase (115), rental/credit issues (55), foreclosure prevention (41), seeking shelter or homeless services (21), and fair housing |
Concentration of low-income and racial minority students into certain schools and districts may compromise school quality and exacerbate housing segregation among students. Encourage neighborhood economic and racial integration for families with children, especially in the City of Charlottesville and urbanized Albemarle County. Decreased racial index of dissimilarities among elementary school students; More equitable share of low-income students among schools. Local governments, Local school boards, non-profit organizations.

**Economic and Racial Disparities among Schools**

2016:
- PHA worked with 143 new housing counseling clients for home purchase (86), rental/credit issues (24), foreclosure prevention (23), seeking shelter or homeless services (1), homeowner counseling (9). There were a total of 52 participants in the VIDA program. The VIDA program was been suspended by the state until further notice as of August 2017.

2017:
- Piedmont Housing Alliance resolved or prevented 28 mortgage delinquency or defaults.

2013:
- Charlottesville continued its City of Promise initiative based on the Harlem Children’s Zone model. It is a data–driven initiative, utilizing neighborhood surveys, academic reports, and demographic and community data to define the impact and to identify areas in need. City of Promise serves the Starr Hill, Westhaven, and 10th & Page Neighborhood. The City is building a new program space for the project.
- The Office of Human Rights along with PHA offer education sessions for school students on what rights families have regarding housing in Charlottesville. Students are encouraged to go home and share the information with their families.

2014:
- (14); conducted 10 fair housing education sessions for 74 people there were a total of 38 participants in the VIDA program at year end.
<table>
<thead>
<tr>
<th>Year</th>
<th>Description</th>
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<tbody>
<tr>
<td>2015</td>
<td>Charlottesville continued its City of Promise initiative. City of Promise utilized CDBG funds to provide 20 persons with new or continuing access to the Dual Generation Program. City of Promise worked with beneficiaries to provide supportive services centered around career training.</td>
</tr>
<tr>
<td>2016</td>
<td>Charlottesville continued its City of Promise initiative. City of Promise utilized CDBG funds to provide 27 persons with new or continuing access to the Enrolled to Launch Program. City of Promise worked with families of children to provide increased participation in parenting education support, quality childcare, preschool enrollment, and quality aftercare.</td>
</tr>
<tr>
<td>2017</td>
<td>Charlottesville continued its City of Promise initiative. City of Promise utilized CDBG funds to provide 19 persons with new or continuing access to the Enrolled to Launch Program. City of Promise worked with families of children to provide increased participation in parenting education support, quality childcare,</td>
</tr>
<tr>
<td>Lack of Housing Accessible to People with Disabilities</td>
<td>Increase the quantity and scope of accessible units; communicate visitability and accessibility needs to homeowners and landlords</td>
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<tr>
<td>2013:</td>
<td>• The City continues its Design for Life Cville program which provides permit fee reductions for visitable and livable improvements in single family attached and detached homes in the City.</td>
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<td>2015:</td>
<td>• One public (housing) facility improvement for persons with special needs completed with CDBG (Arc of Piedmont)</td>
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<td>2016:</td>
<td>• One new HOME homebuyer unit and one homeowner rehabilitation project incorporated accessibility features.</td>
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<td>2017:</td>
<td>• To address the lack of Housing Accessibility Piedmont Housing Alliance is the agent for Central Virginia Rental Unit Accessibility Modification Program (RUAM) and Granting Freedom.</td>
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<td>• Fluvanna/Louisa Housing Foundation (F/LHF) administers RUAM, pays for materials for ramp projects carried out by volunteers, and has 145 aluminum ramps installed</td>
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<td></td>
<td>• AHIP carries out accessibility projects through Seniors Safe at Home and Children Safe at Home</td>
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<td></td>
<td>• Nelson County Community Development Corporation (NCCDF) uses grant funds through the Charlottesville Area Community Foundation (CACF) for accessibility projects.</td>
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<td></td>
<td>• Housing Preservation Grant (HPG) projects include accessibility work.</td>
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</table>
| Language and Cultural Barriers | Reduce cultural and linguistic barriers to housing access; engage different groups in conversations about differences and similarities | Housing information available in multiple languages; Homeownership rate for ethnic minorities | International Rescue Commission, Creciendo Juntos non-profits, schools | • The City conducted a four-factor analysis and Language Access Plan for Limited English Proficiency Persons to determine translation needs/requirements.  
• Piedmont Housing Alliance (PHA) provide services to Limited Efficiency Persons.  
• International Rescue Committee (IRC) provides assistance to limited English speaking clients.  
• Habitat for Humanity continues its work toward the redevelopment of Southwood Mobile Home Park, with financial support from Albemarle County committed during the year. |
|---|---|---|---|
| Homeownership Affordability | Job losses, low wages, and tight credit markets limit homeownership options for a broad range of households | Align home costs with the distribution of incomes in the area; Encourage smaller units with greater access to jobs and services. | HOME Consortium, local governments, non-profit organizations | 2013:  
• 29 homebuyers received down payment assistance (46 loans totaling more than $660,000), plus 3 VHDA CHRP loans and 1 RD 502 loan packaged, leveraging $3,872,000 in first mortgage financing for a total of over $5,235,800 million in affordable home purchases;  
• 47 homeowners assisted with $101,117 in repair and rehab funds, leveraging a total of $233,294 worth of projects in partnership with AHIP and the Fluvanna/Louisa Housing Foundation; 2 community development loans totaling $270,000 and 3 equity investments for affordable housing development. |
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<th>times</th>
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<tbody>
<tr>
<td>• Albemarle Housing Improvement Program (AHIP) completed 10 homeowner rehabs</td>
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<tr>
<td>• Through the City’s CAHF, AHIP provided nine BXBC homeowner rehabs</td>
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<tr>
<td>• CALM/Habitat – 10</td>
<td></td>
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<tr>
<td>• PHA provided downpayment assistance to 10 homebuyers living in the Orangedale/Prospect neighborhood in the City</td>
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<tr>
<td>• The TJCLT added five units of permanently affordable housing in the City</td>
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<tr>
<td>• The City’s Free Paint Program assisted 14 homeowners</td>
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</tbody>
</table>

**2014:**

- PHA provided down payment and closing cost loans to 36 homebuyers totaling $755,095, and assisted 35 home owners with $83,097 in repair and rehab funds, in partnership with AHIP and the Fluvanna/Louisa Housing Foundation
- Completion of Sunrise Park – a mixed income affordable rental apartments and Condos, eight duplexes a total of 66 units
- The City of Charlottesville continues its program to reduce water and sewer connection fees for qualified affordable housing projects. In program year 2014, 6 new units were assisted.
- Completion of 19 HOME homeowner projects including 9 homebuyer projects and 10 homeowner rehabilitation projects
- The City worked with Habitat for Humanity and Southern Development to sell a City owned parcel of land that will allow for 20 affordable for purchase units out of 46 total units, with 25% of the affordable units targeted toward public housing residents (Burnet Commons)
- The City’s Free Paint Program assisted 16 homeowners
2015:

- Completion of 30 HOME homeowner projects including 12 homebuyer projects and 18 homeowner rehab projects
- PHA provided down payment and closing cost loans to 16 homebuyers with 20 down payment loans totaling $276,721 and assisted a 17th homebuyer with $166,250 in reduced-rate mortgage funds through VHDA
- Habitat provided downpayment assistance to 10 homebuyers through the City’s CAHF Scattered funding
- Through the CAHF, AHIP completed 8 homeowner rehabs
- Through the CAHF, AHIP completed 7 homeowner rehabs in the 10th & Page neighborhood through the City’s BXBC program
- Through the CAHF, AHIP completed 19 homeowner rehabs in the Orangedale neighborhood through the City’s BXBC Program
- The City’s Free Paint Program assisted 20 homeowners

2016:

- Twenty-eight homebuyer projects completed with HOME including 12 downpayment assistance projects and 16 homeowner rehabs
- Two new TJCLT homes were completed in partnership with Habitat for Humanity
- PHA provided down payment and closing cost loans to 16 homebuyers totaling $399,362.22
- CRHA has continued working with Habitat for Humanity to place public housing residents at Burnet Commons III, The Park. This effort is a public/private venture between the City of Charlottesville, Habitat and Southern Development Group to
turn a former City landfill into a mixed-income/mixed-use development, with 25% of the affordable units targeted toward public housing residents.

- Albemarle County provided $120,000 of support to Habitat for Humanity for the purchase of lots for six new homes in the Wickham Pond neighborhood in Crozet. The Wickham Pond project will serve as the blueprint to create affordable housing opportunities throughout the Albemarle County growth area, while demonstrating that Habitat homes will enhance and strengthen new communities across the Greater Charlottesville area.
- The City's Free Paint Program assisted 17 homeowners

2017:

- 14 HOME projects were completed including six homebuyer projects, and eight homeowner rehabilitation projects, for a total of 14 units
- The City's Free Paint Program assisted 21 homeowners
- The City’s real estate tax relief program for the elderly/disabled assisted 380 persons
- The City’s disabled Veterans real estate tax exemption program assisted 10 persons
- The Charlottesville Housing Affordability Program assisted 707 persons
- The County of Albemarle received two planning grants funded through CDBG to assist Habitat for Humanity in community organizing and developing plans for the first phase of the Southwood Mobile Park redevelopment. An action plan has been developed with steps leading to construction beginning in late 2019.
The action plan authorizes the creation of multiple teams to successfully implement the collaborative redevelopment project and provides $675,000 in funding to Habitat to provide the necessary support to continue development and submission of the Phase I, involving planning and project management, rezoning application and to match with ongoing grant applications. The funding will allow for the creation of documents and drawings leveraging significant public and private funds for architecture, engineering, and implementation. Albemarle County is also incentivizing the development of 96 affordable housing units at Brookdale.

- TJCLT is in the process of adding two units of affordable housing in the City
- Piedmont Housing Alliance (PHA) completed 8 HB assistance projects across the region and provided reduced interest rate mortgage money to two additional households.
ii. Current Fair Housing Programs and Activities

The City and HOME regional partners sponsor a number of programs to promote fair housing in the City and region, including:

- Rental assistance to income-eligible households through the Housing Choice Voucher (HCV) program
- Raising awareness about fair housing among potential beneficiaries, through Piedmont Housing Alliance (PHA) programs such as:
  - Fair housing workshops
  - Distribution of fair housing educational materials
  - Introduction to Fair Housing Act and instructions for filing a Fair Housing Complaint to VHDA Homebuyer class participants
  - To address the lack of housing accessibility PHA serves as the agent for Central Virginia Rental Unit Accessibility Modification Program (RUAM) and Granting Freedom
  - PHA provides translation services to limited English proficiency persons
- Interagency conferences during with PHA and City of Charlottesville’s Office of Human Rights during the annual “Fair Housing Month” in April
- The International Rescue Committee provides housing assistance to limited English speaking clients

In the 2018 – 2022 Consolidated Plan and Annual Plan, the City and HOME Consortium outlined a variety of programs to expand and preserve the housing stock through homeowner rehab, promotion of rental assistance, homeownership, and new construction for low to moderate-income households. Additional programs and efforts are outlined in section vi. Affordable Housing Policy, Programs and Recommendations.

H. Summary of General Observations

Based on the primary research collected and analyzed and the numerous stakeholder meetings conducted for this report, the following findings are noted. From these findings, the potential impediments to fair housing choice in the City and the Thomas Jefferson Region were identified.

I. Potential Impediments and Recommendations

(refer to chart on following pages)
<table>
<thead>
<tr>
<th>Impediment</th>
<th>Description</th>
<th>Objective</th>
<th>Measurable Result</th>
<th>Proposed Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>The City lacks an over-arching fair housing policy to address barriers to fair housing</td>
<td>Revise and update plans to integrate fair housing policies/principles; when conducting housing studies, examine impacts to fair housing</td>
<td>Incorporate fair housing policy/principles into existing plans and housing studies</td>
<td><strong>Proposed Action:</strong> Integrate fair housing principles into the Comprehensive Plan update to address regulatory barriers identified in the Housing Needs Assessment.</td>
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<tr>
<td>Land use codes and ordinance affect housing location and affordability. Areas of racial concentration in the City are more likely to be areas of concentration of LMI persons. Publicly assisted housing is heavily concentrated in the southern areas in the City.</td>
<td>Revise ordinances that create barriers to housing affordability</td>
<td>Revisions to land use ordinances that allow for greater flexibility to develop compact, mixed-use, mixed-income housing with access to jobs and services; create incentives for affordable housing</td>
<td><strong>Proposed Action:</strong> Consider location when investing funds in development, redevelopment and preservation of housing. Invest public funds in areas that work towards deconcentrating poverty through housing and that promotes diverse neighborhoods through the development of new affordable housing. <strong>Proposed Action:</strong> Revise codes and ordinances to encourage and incentivize the development of affordable housing in areas of high opportunity, and which will support racial, ethnic and economic diversification of the region’s neighborhoods. <strong>Proposed Action:</strong> Develop clear definition of affordable housing and articulate community benefits. <strong>Proposed Action:</strong> Continue to work through long-term, mid-term, short-term and immediate Housing Advisory Committee recommendations to increase the number of affordable housing units in the City. This includes approval of the Housing Strategy. <strong>Proposed Action:</strong> Continue to support form-based code efforts in the City’s Strategic Investment Area Plan. <strong>Proposed Action:</strong> Regional Housing Partnership review of analysis of current zoning and land use regulations and other regulatory barriers in Regional Housing Study to identify impediments to fair housing and work with partners to address.</td>
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<tr>
<td><strong>Rental and Homeownership Affordability</strong></td>
<td><strong>Proposed Action:</strong> Increase the homeownership rate for racial and ethnic minorities; Support workforce development and microenterprise assistance; Support programs to increase financial capacity; Increase the number of affordable homeowner and rental units; create incentives for affordable housing.</td>
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<td><strong>Proposed Action:</strong> Provide and support workforce programs to improve job skills, assist in job placement and promote entrepreneurship. <strong>Proposed Action:</strong> Provide and support credit repair programs, housing counseling programs. Utilize lease to own options within the HOME program. <strong>Proposed Action:</strong> Identify effective ways for local government, fair housing advocates and financial lenders to increase ownership amongst LMI minority households. Activities include support for agencies that provide HUD-Certified Counseling Training for prospective homeowners (credit counseling, pre/post-purchase education), increasing lending, credit and banking services to LMI and minority households, and support increased marketing and outreach efforts of affordable, fair mortgage products. <strong>Proposed Action:</strong> Continue and expand local tax relief programs. Continue and expand programs to provide repairs at low cost to local homeowners. Increase the stock of affordable homes for purchase. <strong>Proposed Action:</strong> Empower and encourage individuals and families from diverse racial and socio-economic backgrounds to set and meet their financial and housing goals by enhancing the impact and reach among African American households with regards to financial capability and home ownership. <strong>Proposed Action:</strong> Increase the number of affordable rental units, provide incentives for development of affordable rental units, and provide local rental assistance. Encourage counties to provide rental assistance. Municipal funding, including HOME funding, should increase the number of affordable rental units. The City of Charlottesville is working to increase funding for affordable housing. Encourage counties to increase funding to support affordable housing. The newly formed Regional Housing Partnership will address housing needs of the Thomas Jefferson Planning District’s region, with a focus on housing production, diversity, accessibility, cost, location, design, and increasing stability for the region’s residents. The RHP will research strategies and models used in other regions that have successfully addressed specific housing needs. The RHP will then assemble decision-makers and stakeholders to identify opportunities to implement new strategies and models in the region. <strong>Proposed Action:</strong> Align annual HOME funding outcomes to the five-year Consolidated Plan Goals. Goals include:</td>
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<td><strong>Proposed Action:</strong> Increase the number of rental and homeowner units through the CAHF. Continue the Charlottesville Supplemental Rental</td>
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| Lack of Accessible Housing for People with Disabilities and People Aging in Place | Larger families are much more likely to have difficulty securing affordable housing. There is a need for tools and developer incentives to support affordable housing development. | Provided for affordable housing | Assistance Program (CSRAP) to provide additional rental assistance to eligible renters.  
- Fluvanna Louisa Housing Foundation (FLHF) – create eight rental units  
- Nelson County Community Development Foundation (NCCDF) – create two rental units  
- County of Albemarle – incentivize 96 rental units at Brookdale  
Non-profit housing foundations – provide payment plan for up-front costs (security deposit, first month rent) or eliminate requirement for own units and housing choice voucher units  
**Proposed Action:** Provide tools and incentives for the development of affordable rental units. Prioritize affordable rental units for persons 0-30% of the AMI.  
**Proposed Action:** Address housing affordability for LMI households through encouraging local employers to provide a living wage.  
**Proposed Action:** Increase funding for the City of Charlottesville’s rent relief and tax relief programs for low-income elderly/disabled households, and the Charlottesville Housing Affordability Program (CHAP) for non-elderly/non-disabled low-income homeowners as a way to increase housing affordability. |
| --- | --- | --- | --- |
| **Lack of Accessible Housing for People with Disabilities and People Aging in Place** | There is a lack of accessible housing to people with a range of disabilities and people aging in place. Reasonable accommodations are needed and not consistently addressed. | Increase the quantity and scope of accessible units; communicate visitability and accessibility needs to homeowners and landlords | # of accessible units; # of group homes and support-services living options; # of people reached through outreach efforts; # of referrals for services  
**Proposed Action:** Support rehabilitation and modernization efforts for public housing residents who have accommodation needs.  
**Proposed Action:** Provide funding for homeowner rehabilitation through HOME & HPG.  
**Proposed Action:** Include basic accessibility features in new home construction.  
**Proposed Action:** Identify accessibility and reasonable accommodation needs and make referrals to local programs and resources such as the AHIP Seniors Safe at Home Program, Piedmont Housing Alliance and FLHF Rental Unit Accessibility Modification Grant (RUAM) Program, FLHF ramp program, JABA, Independent Resource Center, Charlottesville Area Alliance, and the Regional Housing Partnership. |
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<tr>
<th><strong>Insufficient number of Family sized rental units</strong></th>
<th>Family sized units (housing with three or more bedrooms) are more prevalent in the region’s owner-occupied housing stock than in the renter-occupied housing supply (85% and 42% respectively).</th>
<th>Increase the number of family-sized units for renter households</th>
<th># of family-sized rental units created; amount of funding provided for family-sized rental units</th>
<th><strong>Proposed Action:</strong> Prioritize funding for affordable housing rental projects that include units with 3 or more bedrooms, primarily in urban and suburban markets.</th>
</tr>
</thead>
</table>
| **Language and Cultural Barriers** | Language and cultural barriers exist within the region | Reduce cultural and linguistic barriers to housing access; engage different groups in conversations about differences and similarities | Housing information available in multiple languages; completion of four-factor analysis; # of agencies supported; efforts to increase diversity in engagement | **Proposed Action:** Conduct a four-factor analysis to determine if vital HOME and CRHA documents need to be translated.  
**Proposed Action:** Reduce cultural and linguistic barriers to housing access by supporting agencies that provide services and resources to persons with language and cultural barriers.  
**Proposed Action:** Actively engage diverse residents and representatives that support diverse populations in discussions related to local government plans, policies, and programs. |
| Discrimination in the rental and homeowner market | Overt or covert discrimination against renters & homebuyers on the basis of race and ethnicity, family status, disability and source of income. Predatory lending practices Lack of reasonable accommodations exist. | Raise awareness of fair housing laws; provide counseling and advocacy; test for discrimination | # and resolution of complaints; # of people reached with fair housing activities; results from testing (if conducted) | **Proposed Actions:** Raise awareness of fair housing laws through housing counseling and advocacy and provide assistance in filing a formal complaint.  
**Proposed Actions:** Promote VHDA’s Rental Unit Accessibility Modification Grant (RUAM).  
**Proposed Action:** Equip and encourage lenders to refer applicants to service providers who provide credit counseling and other services related to homebuying.  
**Proposed Action:** LGBTQ+ is not a protected class, but any form of discrimination is unacceptable. Encourage LGBTQ+ to report any instances of discrimination.  
**Proposed Action:** Support efforts at the state level for source of income protections. |
J. **Summary of public comments**

Comments were sought out and received throughout the development of the Analysis of Impediments to Fair Housing Choice (AI). The Housing Directors Council reviewed the draft table of actions at their meeting on January 15, 2019, with the following changes made to the plan just prior to the public comment period:

- Revise acronym for Fluvanna Louisa Housing Foundation to reflect FLHF.
- Add (security deposit and first month rent) near the bottom of the second page to define up-front costs to be provided or waived by housing foundations.
- For the action to increase the number of family-sized units for renter households, add phrase to proposed actions “primarily in urban and suburban markets.”

TJPDC will add a section to indicate accessibility features in HOME projects to the bottom of the contractor information form. TJPDC will also work with the housing foundations to include data on all accessibility projects carried out during the program year in the CAPER.

The public comment period of January 17 to February 15, 2019 was advertised in the *Daily Progress* and announced by e-mail to media contacts, agencies and organizations in the region, and neighborhood associations within the City, including the link to the posted draft plan. City Council held a public hearing on the draft plan at their meeting on February 19, 2019.

The Legal Aid Justice Center submitted a detailed letter on February 15, 2019. The letter was provided to the Housing Directors Council for discussion at their February 19, 2018 meeting. Comments and revisions to the AI in response to the comments are summarized below.

- **Comment Summary:** In Section F (iii) “Existence of Fair Housing Discrimination” (draft AI p. 95) housing discrimination is defined somewhat narrowly, limited to a sentence stating that there are no ongoing lawsuits, with little to no information about fair housing concerns, problems or planning initiatives beyond a brief listing of suits or complaints filed.
  
  **Response:** As noted at the end of section IV “Purpose” on page 4, “This analysis not only evaluates actual or potential housing discrimination in the region, but also, more broadly, any actions or omissions that are counterproductive to fair housing choice.” No changes were made to the AI.

- **Comment Summary:** “The August 12, 2017 Unite the Right Rally had a profound impact on the racial realities of the area and its omission from the report is notable.”
  
  **Response:** The AI is focused on existing impediments to fair housing choice and actions to address those impediments, regardless of the factors that created or contributed to those impediments. No changes were made to the AI.
Comment Summary: The AI should include the historical background of racial segregation and its impact on present-day zoning, neighborhoods, and wealth disparities between racial groups in the area.
Response: The AI table of Impediments and Proposed Actions addresses the impacts of land use codes and ordinances, areas of racial concentration, disparities in homeownership rates, and income levels. The purpose of the AI is to identify impediments and develop an action plan to address those impediments. No change to the AI.

Comment Summary: The AI makes no mention of disparate impact discrimination.
Response: The AI makes a concerted effort to address all impediments identified through the data analysis and input from focus groups regardless of the source of the impediment. No change to the AI.

Comment Summary: In the discussion of statistical trends of segregation in the City, the report should mention the need to preserve historically black neighborhoods. Clarify that the goal is not to force Black communities to move.
Response: In the discussion of the dissimilarity index, after the phrase “42 percent of Black residents would have to move to a different location within the region” text has been added “The dissimilarity index is merely a tool to measure segregation. The goal is not to force black communities to move; black communities need to be preserved.”

Comment Summary: The report should place greater emphasis on issues facing the groups who are subject to discrimination in the area, such as LGBTQ+ community and voucher holders. Housing choice voucher residents have no protections from source of income discrimination.
Response: In the Action Table, “Discrimination in the rental and homeowner market” add “source of income” to the list, after disability. Add Proposed Actions: “LGBTQ+ is not a protected class, but any form of discrimination is unacceptable. Encourage LGBTQ+ to report any instances of discrimination. Support efforts at the state level for source of income protection.”

Comments on Table of Proposed Actions

Comment Summary: Increasing affordable housing will have beneficial impacts on areas of the City with concentration of low to medium income persons. Advocates have encouraged the City to include more than $9 million in the FY20 budget toward public housing, vouchers, redevelopment and rehab of affordable housing and the Charlottesville Affordable Housing Fund. Other localities in the region should consider adopting a similar program.
Response: Proposed actions under Rental and Homeownership include “increase the number of affordable rental units, provide incentives for development of affordable rental units, and provide local rental assistance.” Additional text after that initial sentence has been added: “The City of Charlottesville is working to increase funding for affordable housing. Encourage
counties to increase funding to support affordable housing. The newly formed Regional Housing Partnership (RHP) will address the housing needs of the Thomas Jefferson Planning District’s region, with a focus on housing production, diversity, accessibility, cost, location, design, and increasing stability for the region’s residents. The RHP will research strategies and models used in other regions that have successfully addressed specific housing needs. The RHP will then assemble decision-makers and stakeholders to identify opportunities to implement new strategies and models in the region.”

- **Comment Summary**: Beyond encouraging development of affordable rental units, the city of Charlottesville should amend its rent relief program to increase its viability and availability to renters in the city. Other localities should consider adopting a similar program.
  **Response**: Provision of local rental assistance is included in the proposed actions for Rental and Homeownership Affordability. Work is in progress through the RHP. Added “Encourage counties to provide rental assistance.”

- **Comment Summary**: The Planning District should not recommend increased lease-to-own options in the region. Tenants/buyers in such arrangements face high interest rates, increased deposits, more responsibility for repairs, and little or no legal protections as tenants.
  **Response**: Lease-to-own options have been used successfully as part of homebuyer activities under the HOME program. The proposed action has been revised to indicate lease-to-own options “within the HOME program.”

- **Comment Summary**: The localities should bolster their tax relief policies to increase the affordability of long-term homeownership, invest further in programs that provide needed repairs at low cost to local homeowners, and increase the stock of affordable homes available for purchase.
  **Response**: Proposed actions already include “Continue and expand local tax relief programs. Text has been added: “Continue and expand programs to provide repairs at low cost to local homeowners. Increase the stock of affordable homes for purchase.”

- **Comment Summary**: Raising awareness of fair housing laws is insufficient to address discrimination in the rental and homeowner market.
  **Response**: Text addressing source of income discrimination has been added as noted above. The first proposed action has been revised to add “and provide assistance in filing a formal complaint.”

A public hearing was held as part of the February 19, 2019 City Council meeting. No comments were made on the AI at the public hearing.