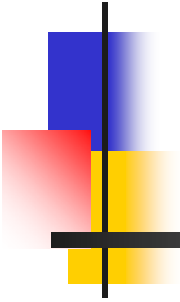


Analysis of Impediments to Fair Housing Choice (AI)

Public Hearing
January 18, 2012



Baltimore Metropolitan Region:
City of Baltimore
Baltimore County
Anne Arundel County
Harford County
Howard County



The Process

- Begun in Fall 2009
- Interviewed scores of stakeholders
- Several draft versions circulated before document was finalized
- Jurisdictions came together with a common desire to AFFH on a regional basis



AI Tasks

- Stakeholder outreach
- Relative presence of protected classes
- Language groups
- Housing and demographic trends
- Degree of segregation
- Areas of racial, ethnic and economic concentration
- Location of affordable housing resources
- Jobs and housing
- Real estate practices
- Local fair housing organizations
- Fair housing complaints
- Mortgage loan denials



Review of Public Policies

- PHA ACOP and Section 8 Admin Plan
- Tenant selection
- Site selection
- Zoning
- Building codes
- Local procedure for processing FH complaints
- Tax policies
- Public transit
- Housing for special needs populations
- Immigrants and LEP
- Composition of appointed boards and commissions
- Newspaper advertising



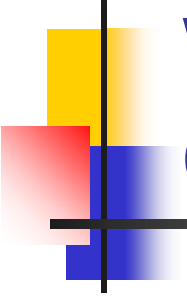
Affirmatively Furthering Fair Housing

- Annual certification by PHAs and CDBG entitlement grantees
- Bending over backwards to make something happen that wouldn't ordinarily happen on its own
- An obligation to do more than simply refrain from discrimination
- An obligation to prevent increases in housing segregation
- FH filter on internal processes and funding decisions
- Consider a wide range of public intervention strategies to expand fair housing choice



AI Outcomes

- Contextual observations – issues that affect fair housing choice
- Impediments – barriers that must be overcome in order to expand fair housing choice
- FH Action Plan:
 - Definitive measures to expand FH choice – what?
 - Performance benchmarks – when?
 - Responsible entities – who does what?
- Improved tracking and reporting of accomplishments



Goal: Balance revitalization with de-concentration and desegregation

- Revitalizing public housing and residential neighborhoods is a necessary and appropriate preservation strategy:

“Improve my neighborhood so that others will want to move in”

- Providing affordable housing in non-impacted neighborhoods is also important:

“Give me a choice of living in a neighborhood that is closer to jobs, has better schools, nicer amenities and a sense of security and well-being”



Dissimilarity Indices

Jurisdiction	2000	2010	
City of Baltimore	71.3	69.2	▼
Baltimore County	64.7	60.7	▼
Harford County	48.8	50.3	▲
Anne Arundel County	47.5	45.9	▼
Howard County	35.3	36.4	▲
Regional	67.1	63.7	▼

Source: CensusScope for 2000 data; Mullin & Loneragan Associates for 2010 data using CensusScope methodology



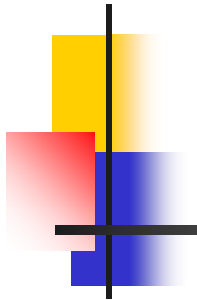
Impediments to FH common among entitlement jurisdictions

- 1 Determine whether the needs of persons with limited English proficiency in accessing programs and services are adequately addressed
- 2 Expand the supply of accessible housing for persons with mobility and sensory impairments – begin by updating the PHAs' Section 504 Needs Assessments and Transition Plans
- 3 Expand fair housing choice by supporting the development/preservation of affordable housing in non-concentrated areas; map locations in CAPER
- 4 Contract with a qualified fair housing agencies to perform housing discrimination testing
- 5 Clearly state AFFH as a priority in all community plans

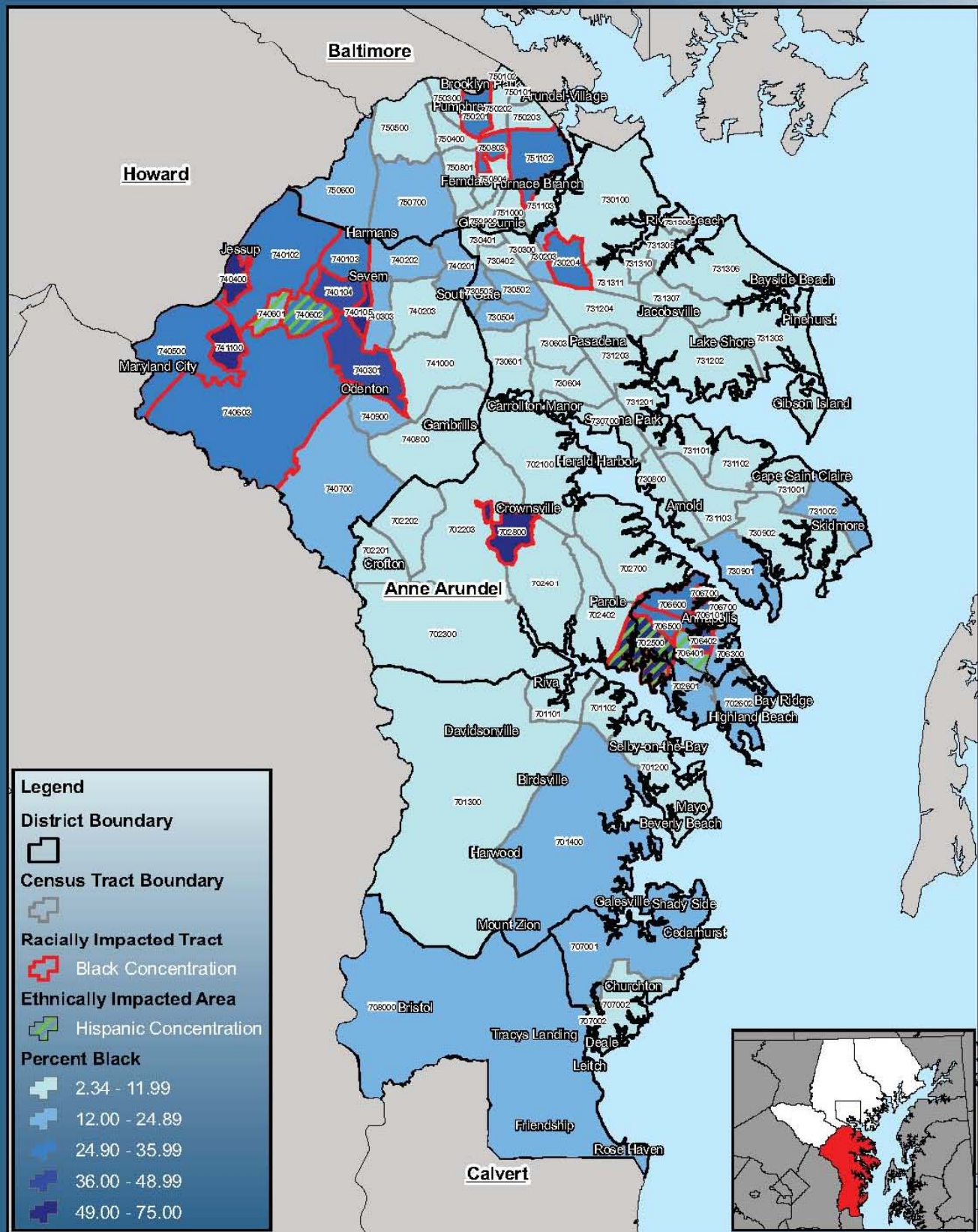


Impediments common among jurisdictions *(cont'd)*

- 6 Expand participation of members of the protected classes on appointed boards and commissions
- 7 PHAs should collaborate more fully with advocacy organizations to assist persons with disabilities that are threatened with eviction
- 8 Adopt and enforce HUD's Site and Neighborhood Selection standards at 24 CFR 983.6
- 9 In developing policy priorities for entitlement investment in affordable housing, give first consideration to the use of HOME funds for new family rental housing on sites outside of impacted areas

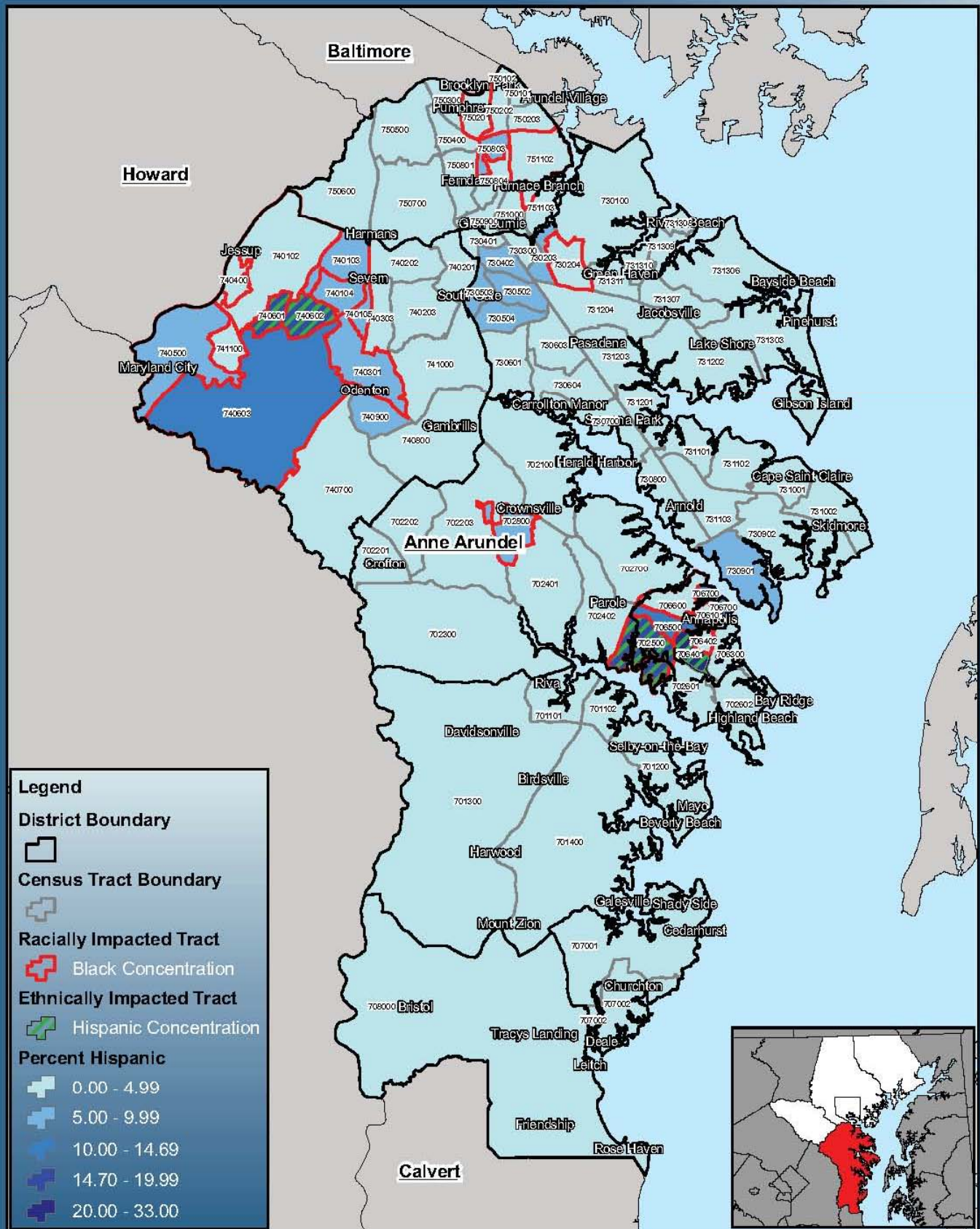


Anne Arundel County



Map 2: Concentration of Hispanic Residents in Anne Arundel County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice





Highlights of Anne Arundel County FHAP

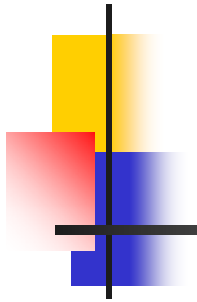
Adopt a fair housing ordinance – designate a fair housing officer, establish procedures by which complaints are processed, investigated and resolved by Commission on Human Relations

Work toward adoption of ***inclusionary zoning ordinance*** - mandate a minimum set-aside of units affordable to lower-income households to create new affordable housing opportunities outside impacted areas

Amend County's zoning ordinance – remove undue restrictions on group homes

Amend ACOP - enable applicants to turn down two units before being moved to bottom of waiting list

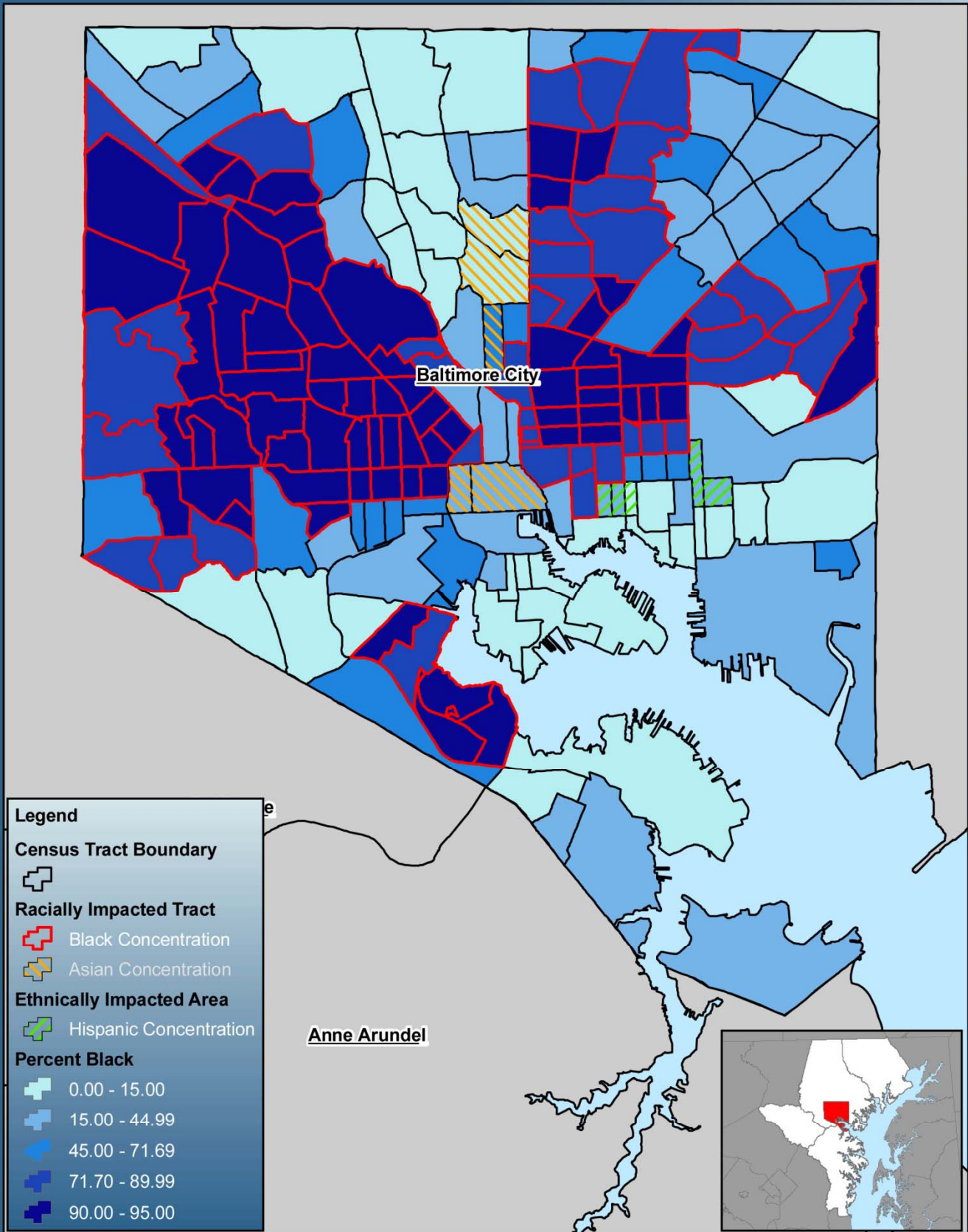
Work toward ***amending Comprehensive Plan*** – add policies and strategies to address unmet housing needs for all household types, including families

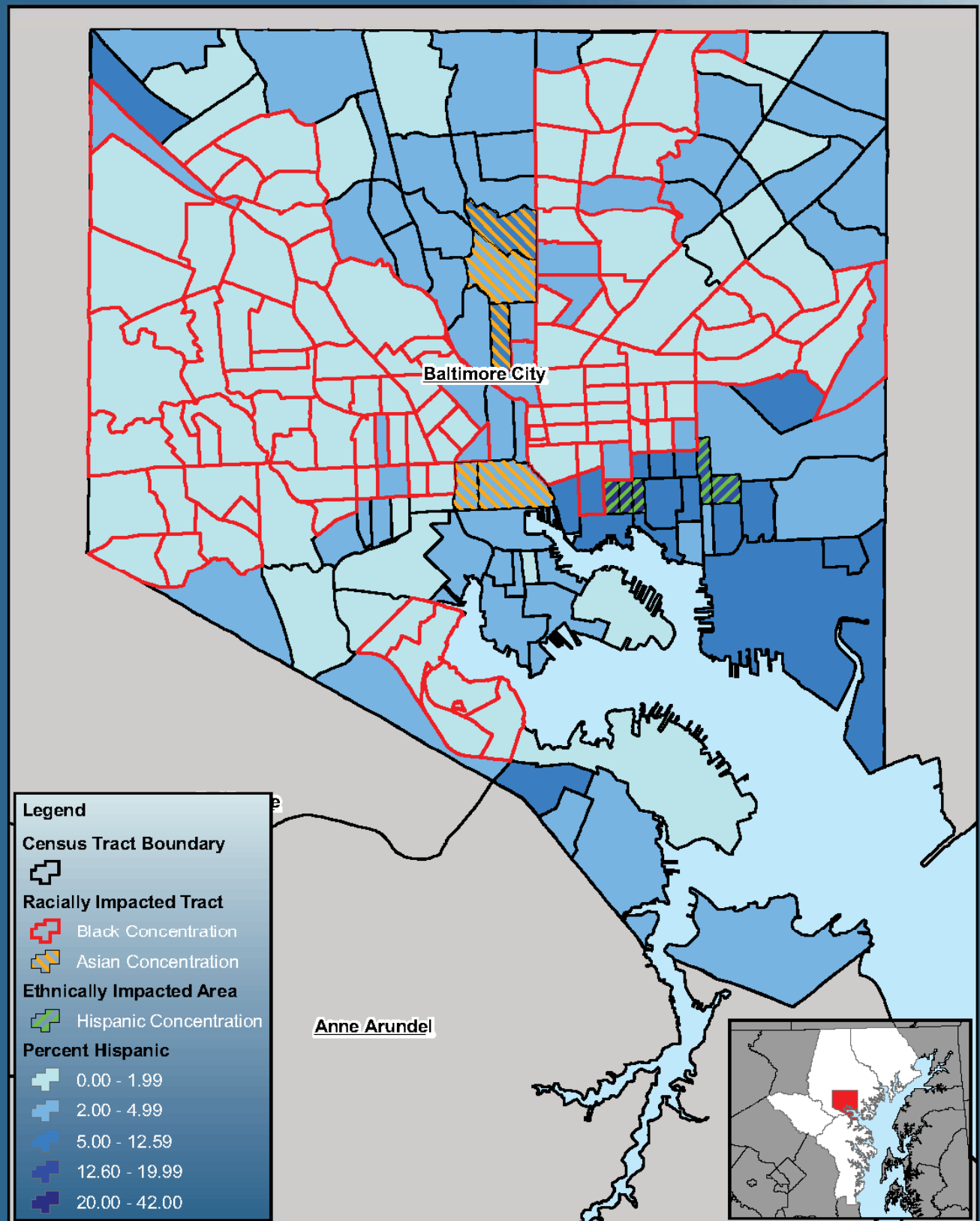


City of Baltimore

Map 1: Concentration of Black Residents in Baltimore City, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice







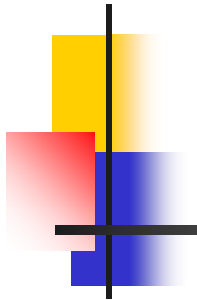
Highlights of Baltimore City FHAP

Create affordable housing through Vacants-to-Value program, neighborhood reinvestment projects and inclusionary housing ordinance

Establish selection criteria for proposed HOME activities - give preference to projects that expand supply of affordable rental housing in opportunity areas

After all 755 UFAS Bailey units are provided, ***determine need for accessible housing***, develop strategies for creating units, taking into account funding availability

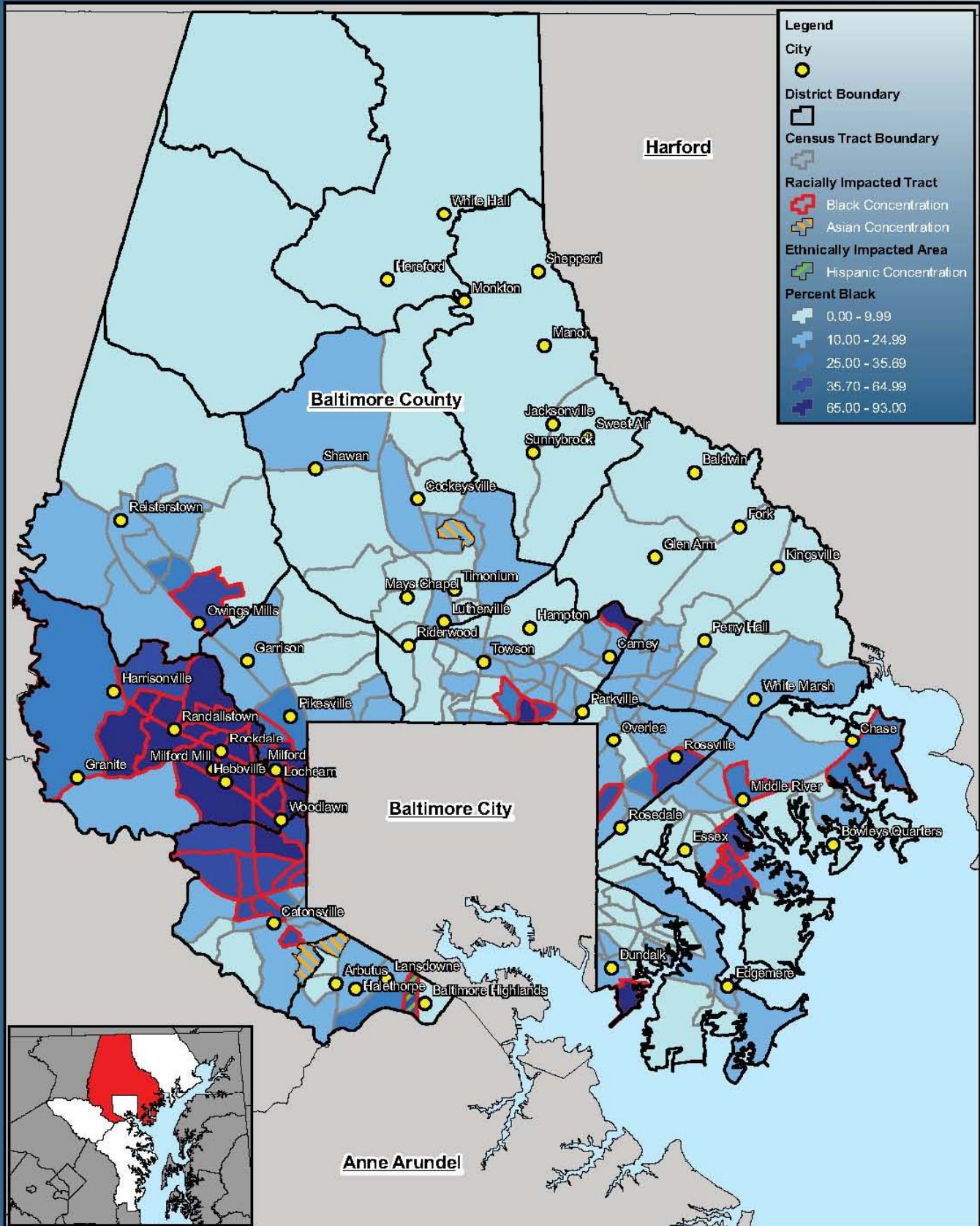
Evaluate role of Community Relations Commission relative to its responsibility to process complaints, in light of budgetary limitations

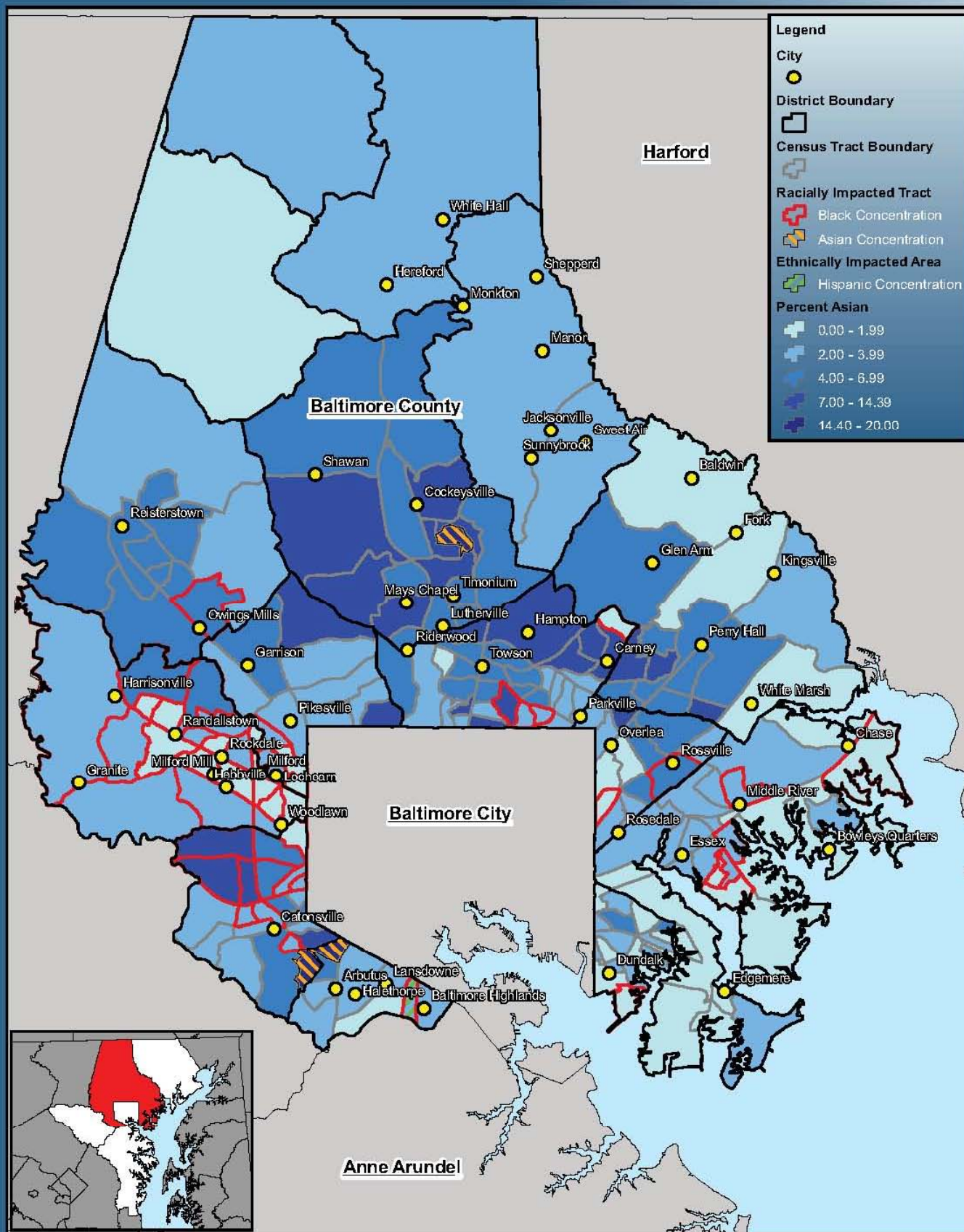


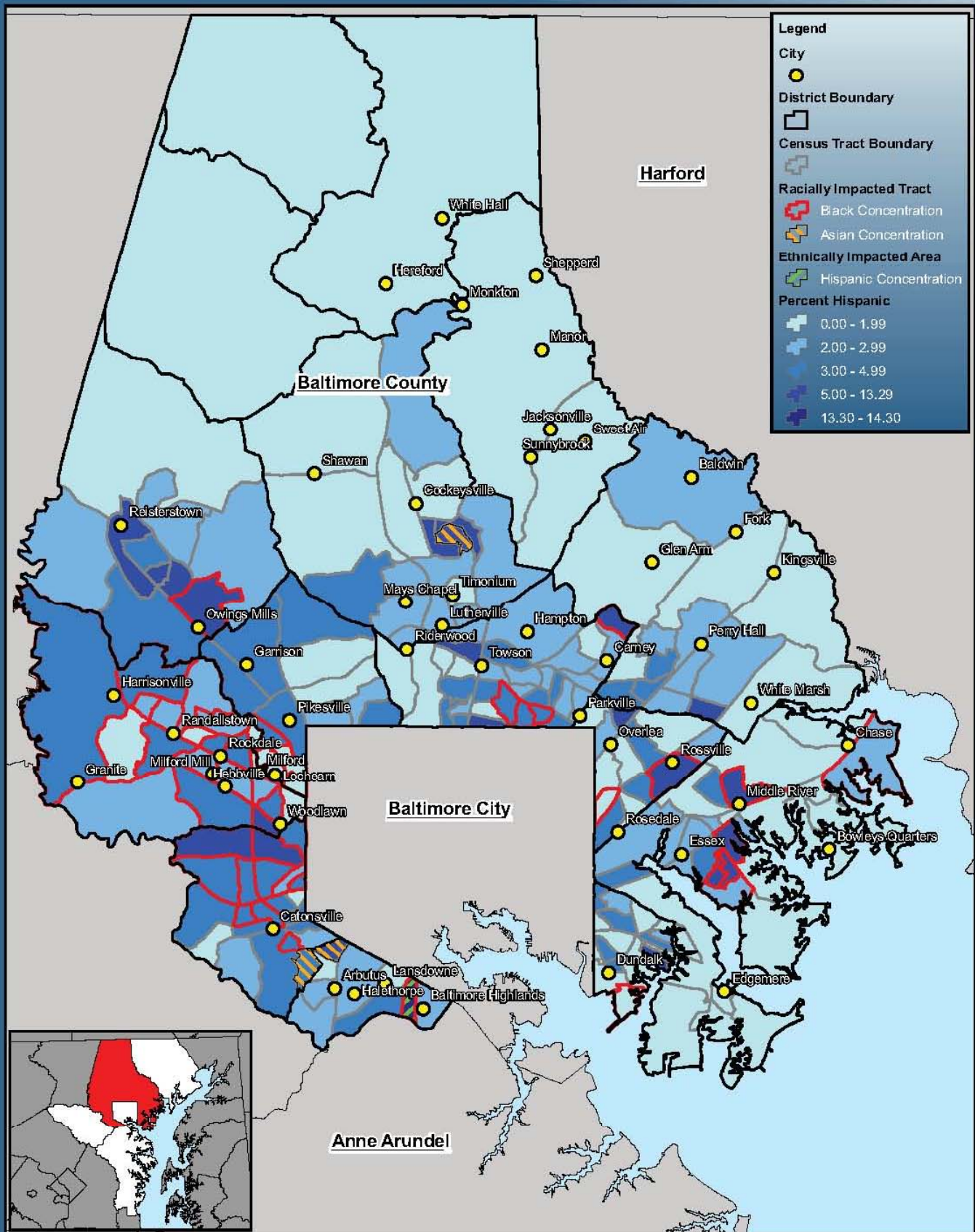
Baltimore County

Map 1: Concentration of Black Residents in Baltimore County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice









Highlights of Baltimore County FHAP

Revise County's HOME policies – remove impediments to the creation of rental units in non-concentrated areas (i.e. the requirement that developers obtain Council approval before submitting an application for financial assistance)

Prepare a written policy that encompasses Site and Neighborhood Selection requirements at 24 CFR 983.6, incorporate into the County's HOME written agreements, distribute as part of application package

Increase Section 8 payment standard for higher-cost areas as a means of expanding fair housing choice outside of racially/ethnically concentrated areas

Publicize the policy to increase the voucher payment standard for landlords willing to create accessible units

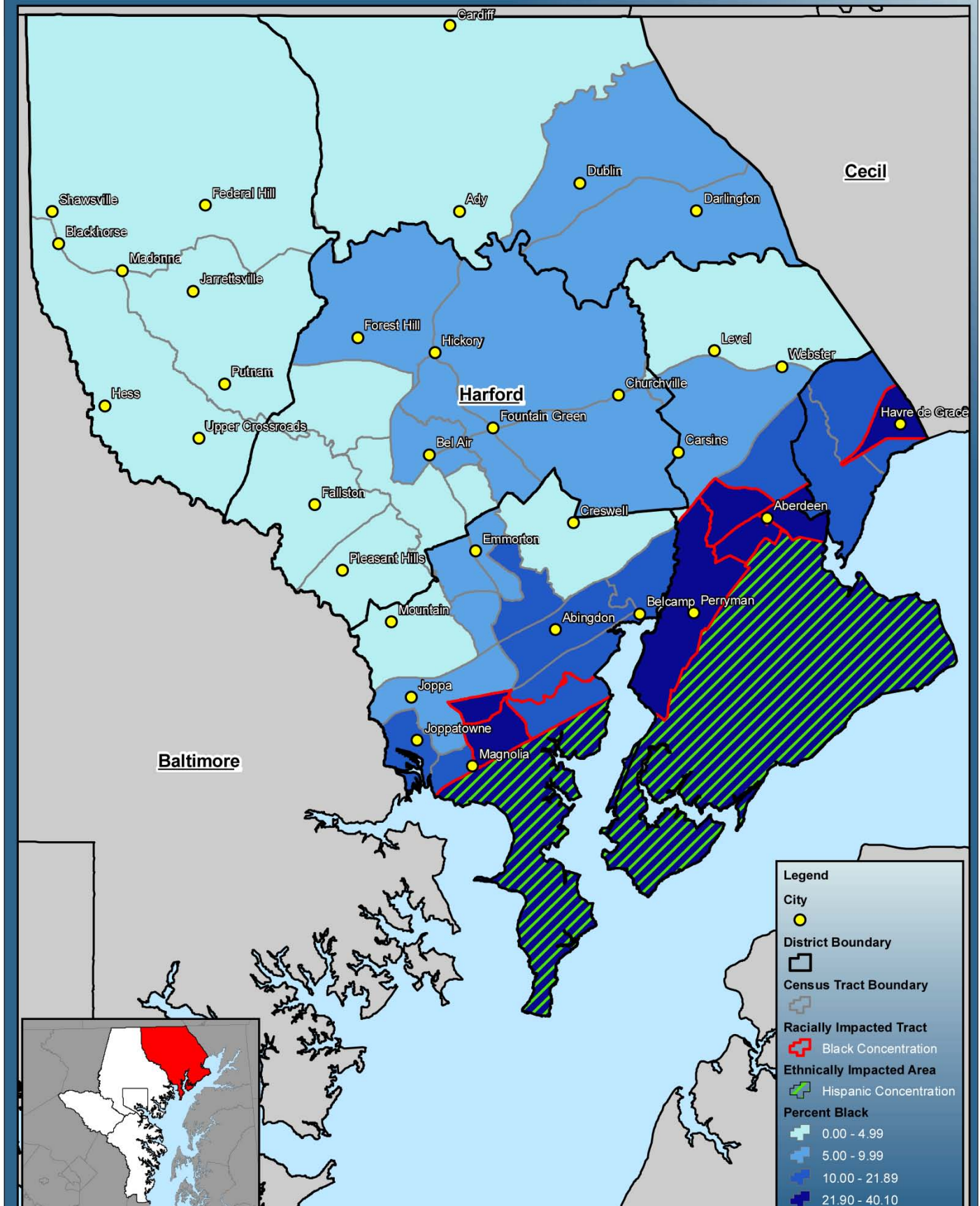
Expand the protections of Article 29 to prohibit discrimination on the bases of familial status and sexual orientation in order to achieve consistency with Maryland's fair housing law



Harford County

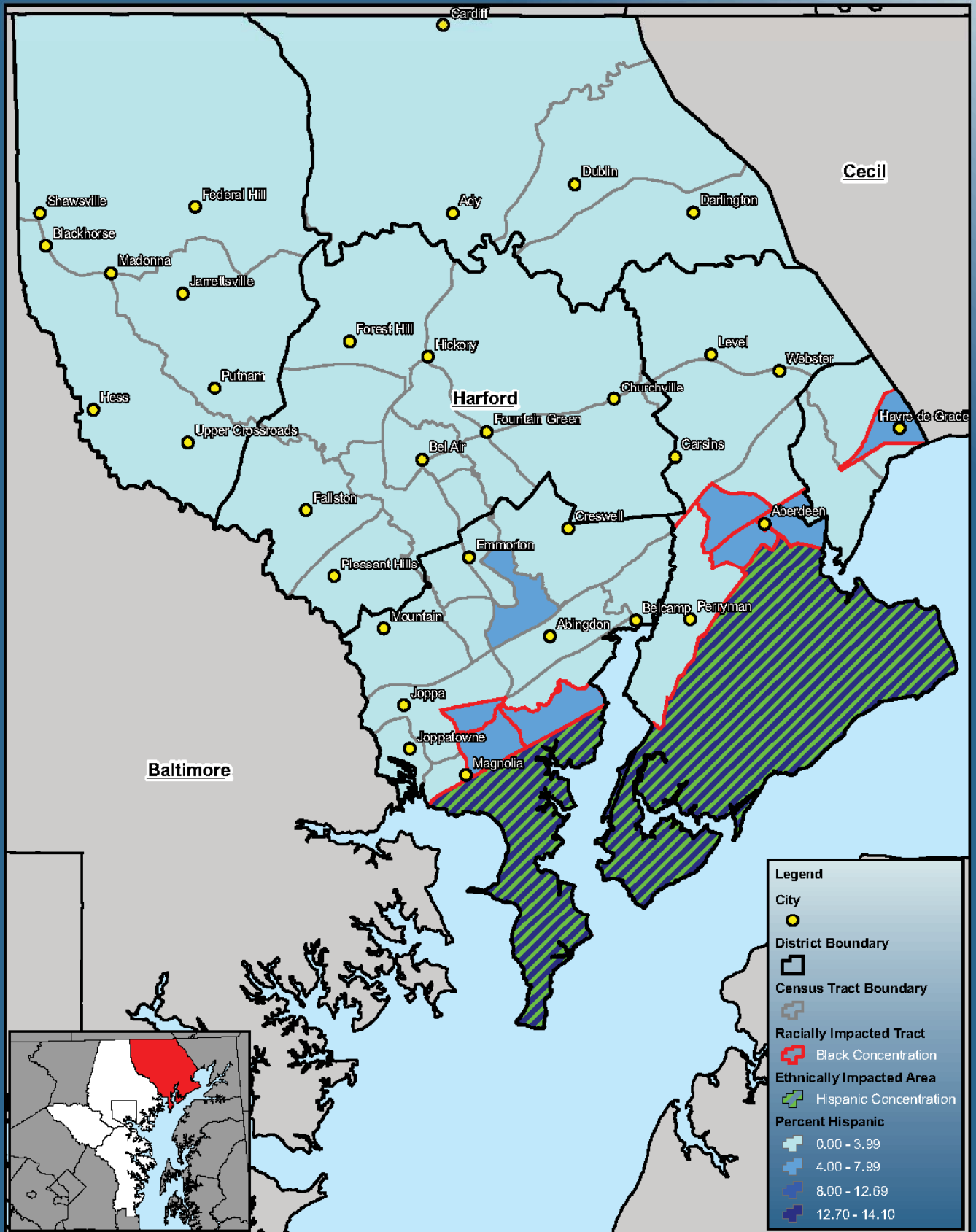
Map 1: Concentration of Black Residents in Harford County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice



Map 2: Concentration of Hispanic Residents in Harford County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice





Highlights of Harford County FHAP

Partner with affordable housing developers – ***increase supply of affordable housing*** in areas outside of minority concentration; collaborate with affordable housing developers to select sites, construct infrastructure, provide financial subsidies, support expansion of affordable housing

Recommend fair housing zoning ordinance amendments to Town of Bel-Air and City of Havre de Grace

Provide additional ***incentives to landlords to induce their participation in the Section 8 program***, including increasing the payment standard on a case-by-case basis

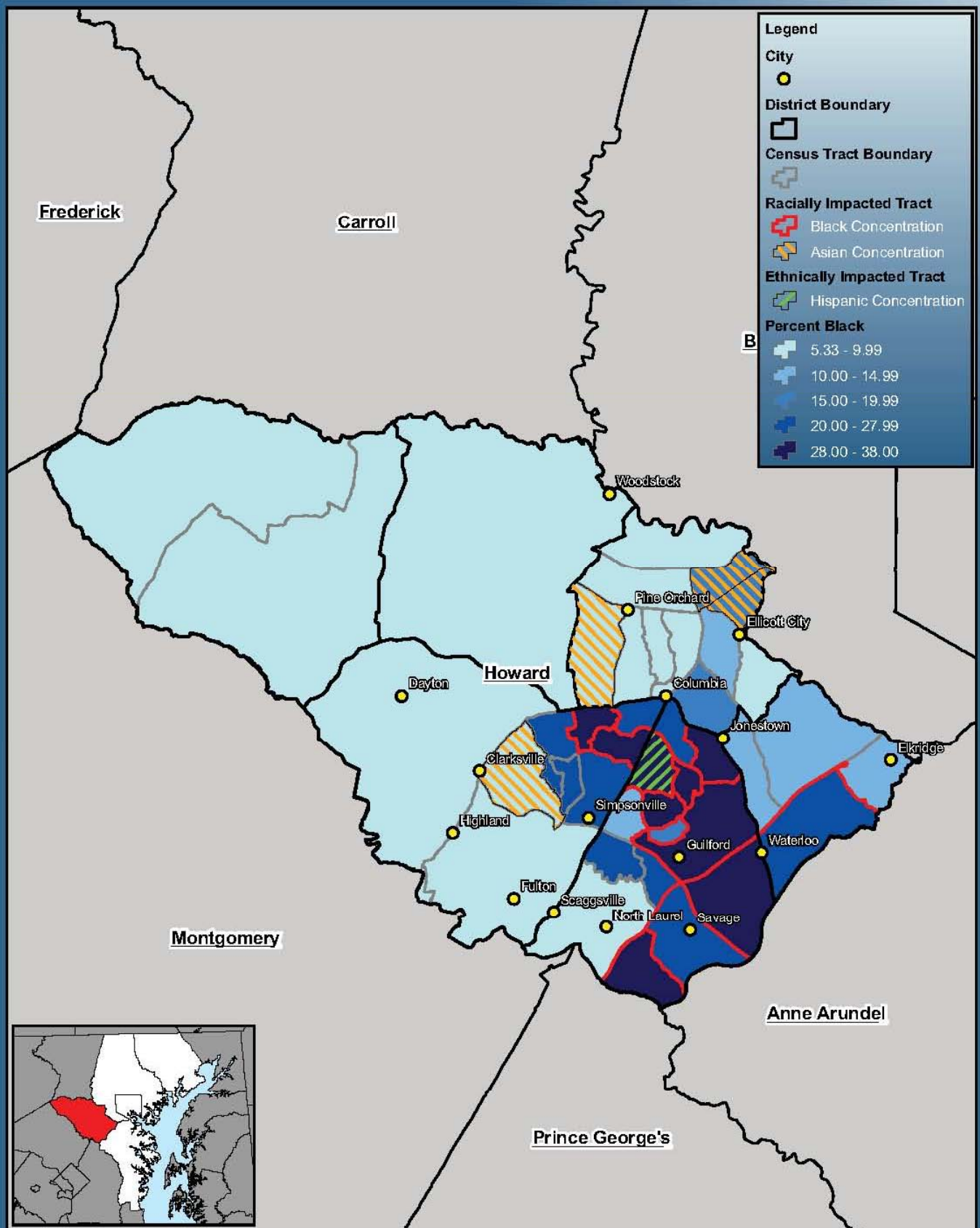
Ensure that local communities that receive CDBG or HOME funds understand their obligation to affirmatively further fair housing



Howard County

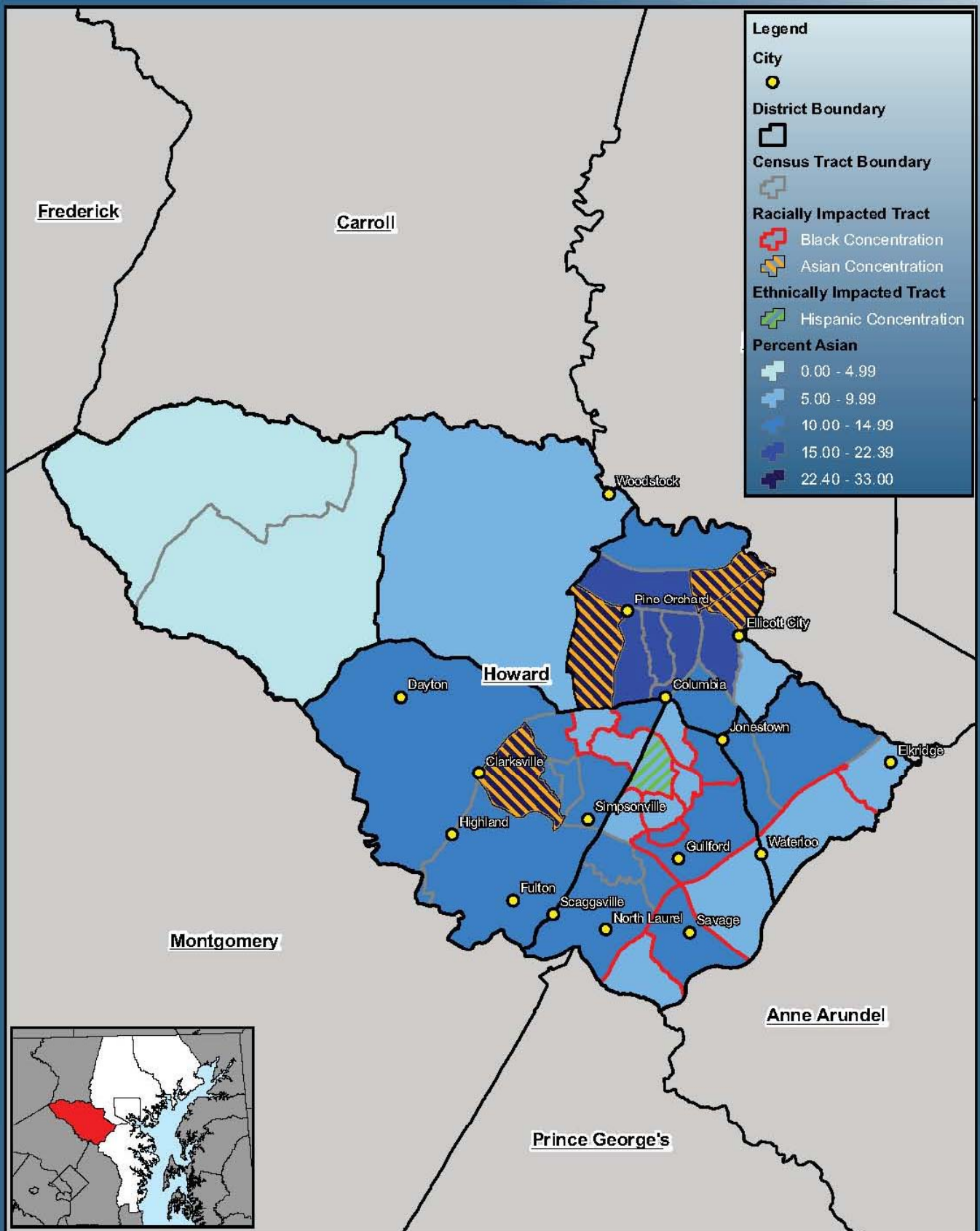
Map 1: Concentration of Black Residents in Howard County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice



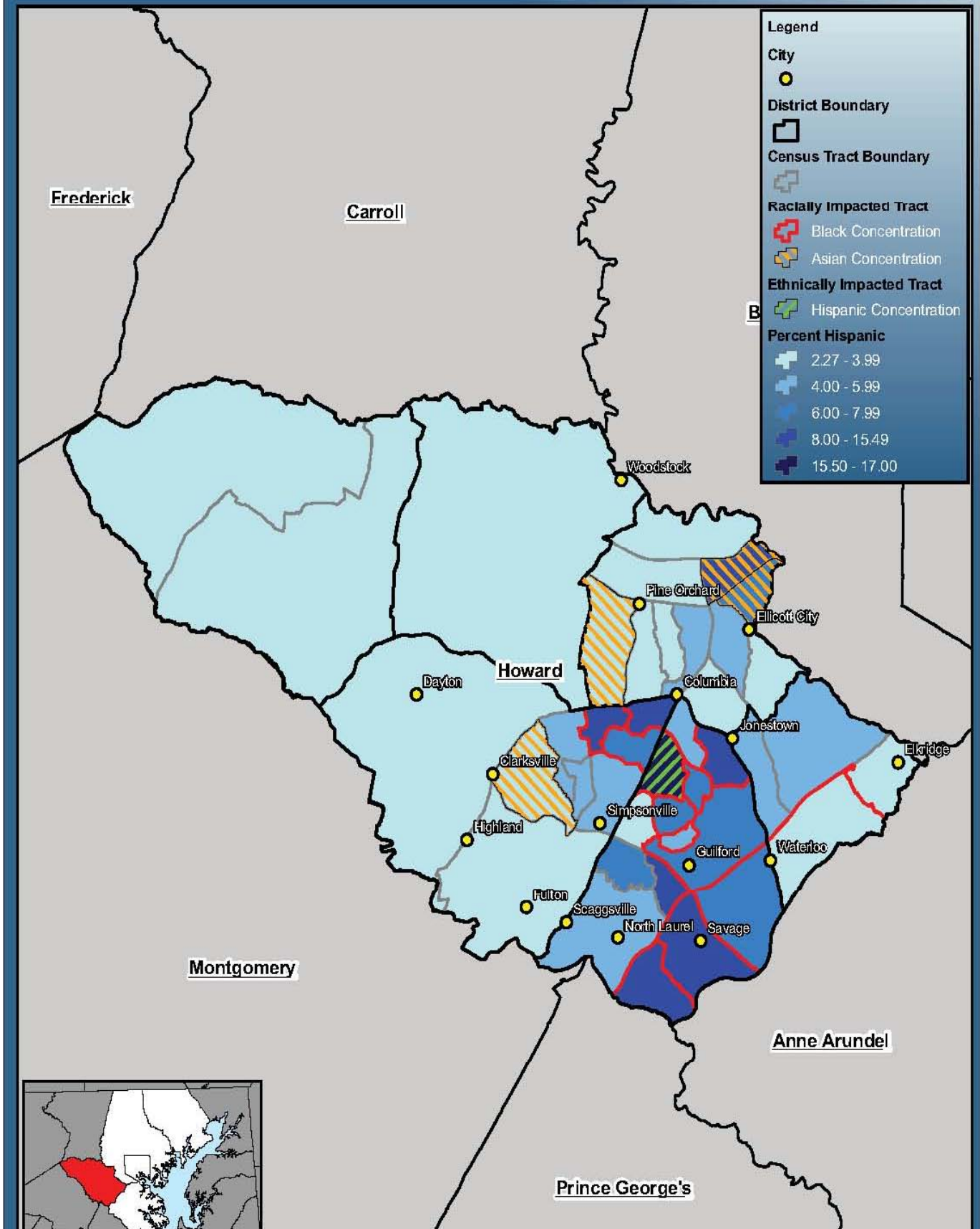
Map 2: Concentration of Asian Residents in Howard County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice



Map 3: Concentration of Hispanic Residents in Howard County, 2009

Baltimore Regional Analysis of Impediments to Fair Housing Choice





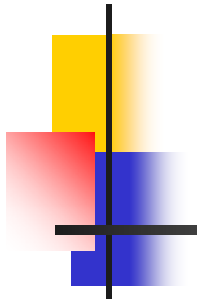
Highlights of Howard County FHAP

Continually monitor racial/ethnic/LMI concentrations in Columbia. Invest entitlement funds in both the revitalization of this community's older neighborhoods and in the creation of affordable housing opportunities in non-concentrated areas

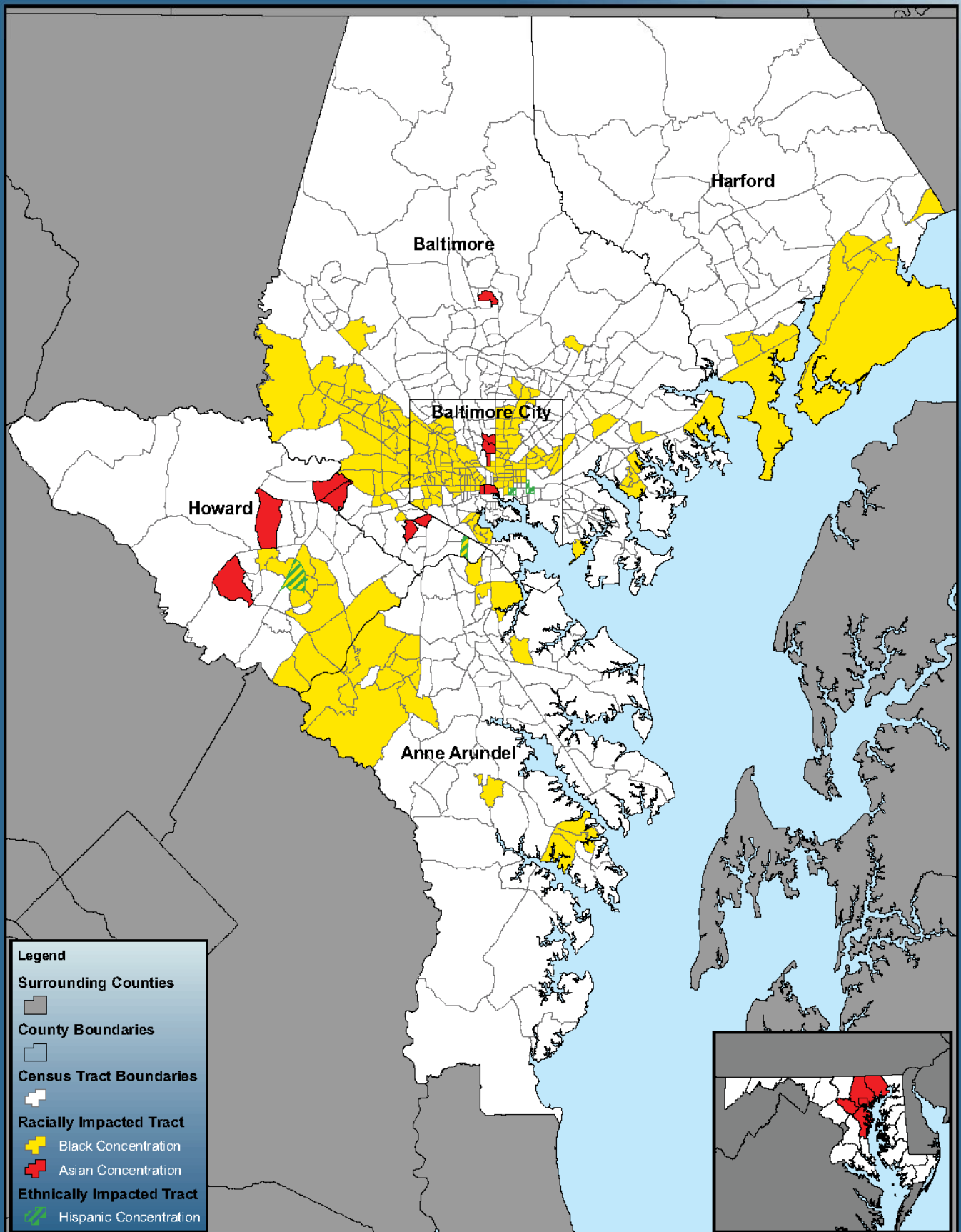
Work with area landlords and property management companies, in conjunction with HCHC, to ***encourage acceptance of Section 8 Housing Choice Vouchers*** in non-impacted neighborhoods

Continue to affordable unit set-asides through the MIHU program. Explore feasibility of increasing percentage of units to be set-aside for moderate-income households

Prepare a written policy that encompasses HUD's Site and Neighborhood Standards to be incorporated as part of the application process for all applicable HOME-assisted projects



Baltimore Region





Regional FHAP

Support a housing replacement policy that encourages the region to work together to:

- a) Preserve the number of affordable housing units available by replacing vacant units or creating equivalent units in opportunity areas whenever economically feasible, and/or
- b) Provide housing choice vouchers, subject to funding availability, relocation assistance and mobility counseling for displaced families within the region

Encourage State of Maryland to revise its QAP and other vehicles for affordable housing to:

- a) Create a set-aside for tax credit projects in opportunity areas of the Baltimore region
- b) Give preference to family units in opportunity neighborhoods
- c) Eliminate local approval requirements
- d) Create incentives for scattered site tax credit projects



Regional FHAP *(cont'd)*

Work with HUD, the Maryland Commission on Civil Rights and/or BMC to ***conduct AFFH workshops for elected officials*** of the participating jurisdictions

Determine the unmet need for affordable accessible housing for persons with mobility impairments in the Baltimore Metropolitan Area; take steps to address the identified unmet need.

Sponsor informational and education sessions for local jurisdictions in the region without inclusionary zoning laws.

Convene a meeting with Maryland DHCD, which already maintains a database of apartments and identifies units that are wheelchair accessible, to ***discuss steps that will result in more landlords listing their units in the State database***, especially landlords with units that are accessible or have accessible features



Regional FHAP *(cont'd)*

Formalize the planned regional efforts to address fair housing issues through a formal MOU:

- set goals each year and establish a schedule to prioritize the action steps recommended in the AI
- articulate the scope of work and expected outcomes for each action
- report regional accomplishments in each participating jurisdiction's CAPER
- establish routine interaction and cooperation among the Baltimore Metropolitan Council, fair housing advocates, the entity implementing the mobility program established pursuant to the *Thompson* partial consent decree, transportation agencies, planning and zoning officials and other interested parties regarding the implementation of the regional AI



Regional FHAP *(cont'd)*

Examine the Section 8 porting procedures of each jurisdiction and, to the extent they are inconsistent, make them consistent. Work with HUD to convene a meeting to discuss porting procedures and regional cooperation. Request additional financial assistance from HUD to allow jurisdictions to implement increased payment standards to encourage moves to opportunity areas.

Encourage entities engaged in transportation planning to involve housing agencies, housing advocates and developers of affordable housing in their planning and policy development processes, including obtaining their comments on specific programs, initiatives and policies released by local, state and federal transportation agencies and on funding strategies.



Regional FHAP *(cont'd)*

Advocate for the adoption of a statewide law to include source of income as a class protected from discrimination.

Continue to hold routine regional education events on fair housing issues, especially as a means by which to educate housing professionals on relevant fair housing issues.

Pursue HUD and MD-DHCD Sustainable Communities opportunities:

- a) Working with BMC on responding to Sustainable Communities NOFAs
- b) Seeking funds to create a regional housing strategy, which would include funds for staff and a study to develop regional funding mechanisms.



Your input is important to the FH planning process

1. Ask questions and voice your concerns at today's hearing
2. Submit comments in writing to:

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Suite 1316
Baltimore, MD 21202

E-mail : AIComments@habc.org