City of Tuscaloosa

ANALYSIS OF IMPEDIMENTS

2020 CITY OF TUSCALOOSA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:



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Final Report March 9, 2020

Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

Central Alabama Fair Housing Center

2867 Zelda Road Montgomery AL, 36106 Phone: 334-263-4663 Fax: 334-263-4664

U.S. Department of Housing and Urban Development

Atlanta Regional Office of FHEO
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Five Points Plaza
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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.¹

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics". Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.⁴

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

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¹ https://www.hud.gov/program offices/fair housing equal opp/fair housing and related law

² § 5.152 Affirmatively Furthering Fair Housing

³ § 5.152 Affirmatively Furthering Fair Housing

⁴ 42 U.S.C.3601 et seq.

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In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.⁵ The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.⁶ Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, City of Tuscaloosa certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Socio-Economic Context

The population in Tuscaloosa grew from 78,746 in 2000 to 100,287 in 2017. While the population has been growing, the City has experienced a shift in the racial and ethnic make-up of the City as well, with a slight increase in the proportion of black residents. In 2017, some 25.0 percent of the population had a high school diploma or equivalent, another 39.0 percent have

⁵ 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

^{6 83} FR 683 (January 5, 2018)

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some college, 16.5 percent have a Bachelor's Degree, and 10.6 percent of the population had a graduate or professional degree.

In 2018, unemployment in Tuscaloosa was at 4.3 percent, compared to 3.9 percent for the State of Alabama. This is representative of a labor force of 46,616 people and 44,608 people employed. Real per capita income in Tuscaloosa has lagged behind the state rate in recent years. Household incomes have risen overall in Tuscaloosa, as households with incomes over \$50,000 have risen as a proportion of the population. However, poverty in Tuscaloosa has remained steady, at 23.7 percent in 2017. This represents 20,796 persons living in poverty in the City.

The City has seen a regrowth in housing production since experiencing a decline in 2009 and 2010. In 2017, there were 917 total units produced in the City, with 507 of these being multifamily units. Single family unit production declined beginning in 2008 and have increased slightly since that time. The value of single-family permits, however, has continued to rise, reaching \$286,441 in 2017. Single-family units account for 51.7 percent of units, while apartments account for 36.6 percent of units. The 2019 Rental Vacancy Survey found that the City's vacancy rate was 6.4 percent for rental units, and the average rent for all units was \$1,080.

Since 2010, the City has seen an increase in the number of vacant units, resulting in vacant units accounting for 26.1 percent of all units in 2017. The largest proportion of these vacant units are those for seasonal, recreational, or occasional use, which accounted for 72.5 percent of vacant units in 2017.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, City of Tuscaloosa has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

- 1. High: Factors that have a direct and substantial impact on fair housing choice
- 2. Medium: Factors that have a less direct impact on fair housing choice, or that City of Tuscaloosa has limited authority to mandate change.
- 3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that City of Tuscaloosa has limited capacity to address.

ADDITIONAL FINDINGS

In addition to the table on the following page are several significant findings or conclusions summarized here. The City had two Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in 2017.

A review of the City's Municipal Code found that there are no city policies to encourage the development of affordable housing or inclusionary policies. The City's definition of "family" did not appear to limit access to housing options in the City.

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The City uses CDBG and HOME funds annually to increase access to various opportunities, as well as increase the supply of an access to affordable housing in Tuscaloosa. Some of the recommendations on the following page are to continue these efforts.

Public input and stakeholder finding indicated the need for a review of the City's zoning to allow for the development of higher density units in more areas of the City. The survey and public input indicated a need for more fair housing outreach and education.

Table I.1				
Contributing Factors City of Tuscaloosa				
Contributing Factors	Priority	Justification		
Discriminatory patterns in lending	High	As demonstrated by 2008-2017 HMDA data, black and Hispanic households have a higher mortgage denial rate than white households. The average denial rate over the entire period was 6.8 percent for white households; however, the denial rate was 21.3 percent for black households, and 14.3 percent for Hispanic households.		
Access to low poverty areas	Med	Low poverty index is markedly lower for black and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. However, the City of Tuscaloosa has little control over increasing access.		
Access to proficient schools	Med	The level of access to proficient schools is lower for black and Hispanic households than for other racial or ethnic groups in the City. However, the City has little control over this on a large scale.		
Access to labor market engagement	Med	Black households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.		
Moderate to high levels of segregation	High	Black and Hispanic households have high levels of segregation in Tuscaloosa, according to the Dissimilarity Index. American Indian, Native Hawaiian, and "other" racial households have moderate to high levels of segregation. However, these households represent less than one percent of the overall population in Tuscaloosa.		
Insufficient affordable housing in a range of unit sizes	High	Some 37.6 percent of households have cost burdens. This is more significant for renter households, of which 50.0 percent of renter households have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.		
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 50.9 percent of persons aged 75 and older have at least one form of disability.		
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.		
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.		
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.		

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND RECOMMENDED ACTIONS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

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Table I.2 Recommended Fair Housing Issues, Contributing Factors, and Recommended Actions City of Tuscaloosa				
Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken		
Segregation	Moderate to high levels of segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years.		
	Access to low poverty areas	Review opportunities annually to increase funding sources for additional low-income housing in high opportunity areas. Continue to use CDBG funds to provide transportation services to low income and elderly households; review need for transportation annually.		
Disparities in Access to Opportunity	Access to proficient schools Access to labor market engagement	Continue to promote homeownership opportunities in high opportunity areas with financial assistance to homebuyers using HOME funds: 40 households over five (5) years.		
	Labor market engagement	Explore opportunities annually for redevelopment or rehabilitation of residential properties in high opportunity areas. Continue to use CDBG funds to rehabilitate housing units in high opportunity areas: 30 households over five (5) years.		
Disproportionate Housing Need	Insufficient affordable housing in a range of unit sizes	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years.		
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	Moderate to high levels of segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years. Review opportunities annually to increase funding sources for		
Publicly Supported Housing	Insufficient affordable housing in a range of unit sizes	Locate any future publicly supported housing units in high opportunity areas. Locate any future publicly supported housing units in high opportunity areas. Review the location of publicly supported housing units annually.		
Disability and Access	Insufficient accessible affordable housing	Research opportunities for increased funding options annually. Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years.		
	Insufficient fair housing education	Promote fair housing education through annual or biannual workshops.		
Fair Hausian F. Consum.	Insufficient understanding of credit	Promote annual outreach and education related to credit for prospective homebuyers.		
Fair Housing Enforcement and Outreach	Insufficient fair housing infrastructure	Partner with agency to provide financial literacy classes for prospective homebuyers on an annual basis.		
	Discriminatory patterns in lending	Add fair housing information to the City's website, review information annually.		

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Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2020 City of Tuscaloosa Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the 2019 Fair Housing Survey, a series of Focus Groups, a Fair Housing Forum, and a Public Review Meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 108 responses have been received.

Two Focus Groups were held in October, 2019, to gather input and feedback from stakeholders in the community.

The Fair Housing Forum was held on December 4th in order to gather feedback and input from members of the public.

The Draft for Public Review AI was made available on January 22 and a 30-day public input period was initiated.

A public hearing will be held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final draft was made available to the public at the beginning of January 2020.

B. THE 2019 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the City of Tuscaloosa were invited to participate. At the date of this document, some 108 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

C. FOCUS GROUPS AND FAIR HOUSING FORUM

Two Focus Groups and a Fair Housing Forum were held in Tuscaloosa to gather additional feedback on housing choice in the City. A summary of the comments received during these meetings are also included below. The complete transcript from these meetings is included in the Appendix.

- Concern over the amount of vacant housing
- Lack of access to public transportation in certain areas of the City
- NIMBY concern for multifamily housing/apartments
- Conversion of larger units to one, two, three bedrooms
- Need for outreach and education

- Need to update zoning codes
- Need for downsized lots for smaller homes

D. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held January 22, 2020 through February 27, 2020.

It included a public review meeting on February 27, 2020. The complete transcript from this meeting is included in the Appendix.

Section III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice for Tuscaloosa was last completed in 2015. The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Higher denial rates to black, Hispanic, and female loan applicants. This impediment was identified through a review of data on patterns in home lending gathered under the Home Mortgage Disclosure Act (HMDA) from 2004 through 2013. According to those data, the home purchase loan denial rate for black applicants, at 28.1 percent, was well over twice the denial rate for white applicants. Similarly, Hispanic applicants were denied home purchase loans at a rate of 29.1 percent, nearly twice the denial rate for non-Hispanic applicants. Finally, the denial rate for female applicants, at 22 percent, exceeded that of male applicants by nearly eight percentage points.

- Action 1.1: Increase outreach and education to local high school and college students, focusing on the importance of building and maintaining good credit.
- Measurable Objective 1.1: The number of outreach and education sessions conducted and the number of participants.

Impediment 2: Lack of understanding of fair housing laws. This impediment was identified through review of responses to the 2015 City of Tuscaloosa Fair Housing Survey. Though a large majority of stakeholders who responded to the survey considered themselves to be "somewhat" or "very" familiar with fair housing laws, nearly thirty percent felt that current levels of fair housing outreach and education were insufficient, suggesting that there is a perception that knowledge of fair housing is not widespread among members of the public.

- Action 2.1: Conduct fair housing outreach and education efforts on the subject of fair housing law and policy, focusing on fair housing concerns in the private housing market. Topics to be presented and discussed may include housing discrimination, the rights and responsibilities of housing providers in the housing market, how to identify illegal housing discrimination, and where to turn when you believe that you have been subjected to illegal discrimination in the housing market.
- Measurable Objective 2.1: The number of outreach and education sessions offered and the number of participants in those sessions.

Impediment 3: Lack of a fair housing infrastructure in the city. This impediment was identified through a review of fair housing resources available to Tuscaloosa residents as well as in lack of use of the fair housing complaint system. There is currently no organization at the city, county, or state level that serves Tuscaloosa residents as a participant in the Fair Housing Initiatives Program (FHIP),

nor is there a local or state agency that serves city residents as a participant in the Fair Housing Assistance Program (FHAP).⁷

- Action 3.1: Locate a Fair Housing Initiative Partnership participant (FHIP) to provide complaint intake and processing to Tuscaloosa residents who believe that they have been subjected to illegal discrimination in the city's housing market.
- Measurable Objective 3.1: Record of attempts to contact and engage a FHIP for complaint processing, the number of complaints filed with the FHIP by city residents, and the outcome of those complaints.

Impediment 4: Discrimination on the basis of race and disability. This impediment was identified through review of HUD housing complaints that Tuscaloosa residents filed against housing providers in the city, as well as the 2015 Fair Housing Survey. The most common complaint among those filed with HUD alleged discrimination on the basis of race, followed by disability. In addition, a number of survey respondents cited discrimination on the basis of race and disability.

- Action 4.1: Conduct outreach and education, to housing providers and consumers alike, concerning fair housing law and policy.
- Measurable Objective 4.1: The number of outreach and education sessions conducted, and the number of participants in those sessions.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Apparent shortage of family-oriented housing in Tuscaloosa. This impediment was identified through review of the 2015 Fair Housing Survey; as well as in consultation with local stakeholders during the 2015 Fair Housing Forum and Housing Policy Focus Group discussion. Survey respondents frequently cited the perceived shortage of family-oriented housing throughout the city, and maintained that this shortage was driven in large part by a recent emphasis on student housing in new construction. This perception was shared and by participants in the fair housing forum and focus group discussions.

- Action 1.1: Promote the production of affordable housing units for households with children.
- Measurable Objective 1.1: The number of affordable units added to the city's affordable housing stock.

Impediment 2: Lack of understanding of fair housing law. As noted above, results of the 2015 Fair Housing Survey suggest that knowledge of fair housing law and policy may be limited among local stakeholders. Lack of fair housing knowledge was included as both a private and public sector impediment to underscore the role that the public sector may play in addressing the impediment and the fact that lack of awareness of fair housing law and policy impacts the deployment of resources in the public and private sectors.

Action 2.1: Conduct or enhance outreach and education efforts on the subject of fair housing law and policy, focusing on fair housing concerns that are connected to the use of public resources and on the policy process of local government agencies. Topics to be discussed in the course of such education efforts may include fair

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⁷ Participants in these programs work in coordination with HUD, and with the aid of federal funding, to provide fair housing enforcement and education at the state and local level.

housing issues in zoning and land use decisions, the requirement to affirmatively further fair housing, and other topics.

Measurable Objective 2.1: The number of outreach and education sessions offered and the number of participants in those sessions.

Impediment 3: Concentrations of assisted housing in areas with higher concentrations of lower-income households. This impediment was identified through analysis of the locations of existing public-assisted housing units, and their relation to areas with higher concentrations of poverty. Housing units that were subsidized by the Public Housing program or various HUD multifamily subsidies were located exclusively to the south of the river, near transit lines and generally in areas with above-average concentrations of poverty.

- Action 3.1: Develop a proposal for new apartment or multifamily construction, requiring that a percentage of new developments in the city be dedicated to affordable housing, or that developers wishing to opt out of this requirement pay a one-time fee, to be deposited into an affordable housing trust fund.
- Measurable Objective 3.1: Record of discussion and development of proposal, the completed proposal, and subsequent actions taken with regard to the proposal.
- Action 3.2: Establish a dialogue between the Housing Authority and Transit Authority to better coordinate the siting of future affordable housing and the expansion of transit routes, with the goal of identifying new areas for affordable housing development beyond those that served by the currently existing transit network.
- Measurable Objective 3.2: The establishment and record of dialogue between the transit authority and the housing authority.

Impediment 4: Lack of a fair housing infrastructure in the city. This impediment was identified through a review of fair housing resources available to Tuscaloosa residents as well as in lack of use of the fair housing complaint system. As noted in the description of Private Sector Impediment 2, there is currently no organization at the city, county, or state level that serves Tuscaloosa residents as a participant in the Fair Housing Initiatives Program (FHIP), nor is there a local or state agency that serves city residents as a participant in the Fair Housing Assistance Program (FHAP).⁸

- Action 4.1: Solicit the participation of a FHIP in local fair housing enforcement and policy. Establish a contract with the FHIP to provide education and outreach and fair housing testing in the city.
- Measurable Objective 4.1: Record of contact with local and state FHIP organizations, the establishment of a contract with the FHIP, and quarterly reports prepared by the FHIP pursuant to the contract.

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⁸ Participants in these programs work in coordination with HUD, and with the aid of federal funding, to provide fair housing enforcement and education at the state and local level.

FAIR HOUSING ACTIVITIES

The following actions have been described in the 2015 Consolidated Annual Performance and Evaluation Report (CAPER):

The City has pushed education opportunities to address of the impediments dealing with awareness and education in regards to fair housing. The completed a fair housing educational ad that is available to landlord, lenders, renters, homebuyers, etc. In addition, the City held a fair housing event and includes fair housing education homebuyer education classes. The City's housing counselor is also readily available to provide one on one counseling to educate the Tuscaloosa community.

The City also has in place the Down Payment Assistance program which often allows for homebuyers to have opportunity to locate various areas of the city which addresses Impediment 3 under Public Sector.

Section IV. Fair Housing Analysis

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. This analysis uses ACS Data to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the City of Tuscaloosa.

Lead Agency and Service Area

The City of Tuscaloosa, led by the Office of Federal Programs, is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

A. SOCIO-ECONOMIC OVERVIEW

DEMOGRAPHICS

Population Estimates

Table IV.1, at right, shows the population for the City of Tuscaloosa. As can be seen, the population in the City of Tuscaloosa increased from 90,468 persons in 2010 to 100,287 person in 2017, or by 10.9 percent. The City's recent housing study found that the City is expected to grow at a faster rate than most other cities in Alabama over the course of the next decade.⁹

Census Demographic Data

In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released several tabulations in addition to the full SF1 100 percent count data including the one-in-six SF3 sample. These additional samples, such as the SF3, asked supplementary questions regarding income and household attributes that were not asked in the 100 percent count. In the 2010 decennial census, the Census Bureau did not collect additional sample data, such as the SF3, and thus many important housing and income concepts are not available in the 2010 Census.

To study these important concepts the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results

Table IV.1 Population Estimates City of Tuscaloosa Census Population Estimates				
Year	Population	Percent Yearly Change		
2000	78,746			
2001	79,260	0.7%		
2002	79,219	-0.1%		
2003	79,620	0.5%		
2004	80,294	0.8%		
2005	82,028	2.2%		
2006	84,869	3.5%		
2007	85,731	1.0%		
2008	87,374	1.9%		
2009	89,829	2.8%		
2010	90,468	0.7%		
2011	91,408	1.0%		
2012	92,649	1.4%		
2013	94,148	1.6%		
2014	95,941	1.9%		
2015	97,795	1.9%		
2016	98,767	1.0%		
2017	100,287	1.5%		

 $^{^{9}}$ City of Tuscaloosa, 2018 Comprehensive Five-year Affordable Housing Study, 2018

as one-, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level, and considered more robust than the one or three year sample estimates.

Population Estimates

Population by race and ethnicity through 2017 in shown in Table IV.2. The white population represented 51.0 percent of the population in 2017, compared with black populations accounting for 44.2 percent. Hispanic households represented 2.6 percent of the population in 2017.

Table IV.2 Population by Race and Ethnicity City of Tuscaloosa 2010 Census & 2017 Five-Year ACS				
Race	2010 Ce	ensus	2017 Five	-Year ACS
Race	Population	% of Total	Population	% of Total
White	48,684	53.8%	49,649	51.0%
Black	37,543	41.5%	43,031	44.2%
American Indian	220	0.2%	212	0.2%
Asian	1,666	1.8%	2,410	2.5%
Native Hawaiian/ Pacific Islander	22	0%	67	0.1%
Other	1,352	1.5%	895	0.9%
Two or More Races	981	1.1%	1,109	1.1%
Total	90,468	100.0%	97,373	100.0%
Non-Hispanic	87,763	97.0%	94,845	97.4%
Hispanic	2,705	3.0%	2,528	2.6%

The change in race and ethnicity between 2010 and 2017 is shown in Table IV.3. During this time, the total non-Hispanic population was 94,845 persons in 2017. The Hispanic population was 2,528.

Table IV.3 Population by Race and Ethnicity City of Tuscaloosa 2010 Census & 2017 Five-Year ACS				
Race	2010 Census		2017 Five-Year ACS	
Nuoc	Population	% of Total	Population	% of Total
	Non-H	lispanic		
White	47,574	54.2%	48,243	50.9%
Black	37,417	42.6%	42,925	45.3%
American Indian	190	0.2%	116	0.1%
Asian	1,659	1.9%	2,395	2.5%
Native Hawaiian/ Pacific Islander	19	0%	67	0.1%
Other	74	0.1%	66	0.1%
Two or More Races	830	0.9%	1,033	1.1%
Total Non-Hispanic	87,763	100.0%	94,845	100.0%
	His	panic		
White	1,110	41.0%	1,406	55.6%
Black	126	4.7%	106	4.2%
American Indian	30	1.1%	96	3.8%
Asian	7	0.3%	15	0.6%
Native Hawaiian/ Pacific Islander	3	0.1%	0	0%
Other	1,278	47.2%	829	32.8%
Two or More Races	151	5.6%	76	3.0%
Total Hispanic	2,705	100.0	2,528	100.0%
Total Population	90,468	100.0%	97,373	100.0%

The number of foreign born persons is shown in Table IV.4. An estimated 0.7 percent of the population was born in China excluding Hong Kong and Taiwan, some 0.6 percent were born in Guatemala, and another 0.5 percent were born in Korea.

Table IV.4 Place of Birth for the Foreign-Born Population City of Tuscaloosa 2017 Five-Year ACS				
Number	Country	Number of Persons	Percent of Total Population	
#1 country of origin	China excluding Hong Kong and Taiwan	657	0.7%	
#2 country of origin	Guatemala	620	0.6%	
#3 country of origin	Korea	479	0.5%	
#4 country of origin	Mexico	467	0.5%	
#5 country of origin	India	225	0.2%	
#6 country of origin	Germany	217	0.2%	
#7 country of origin	Ethiopia	215	0.2%	
#8 country of origin	Kuwait	167	0.2%	
#9 country of origin	Canada	132	0.1%	
#10 country of origin	Philippines	90	0.1%	

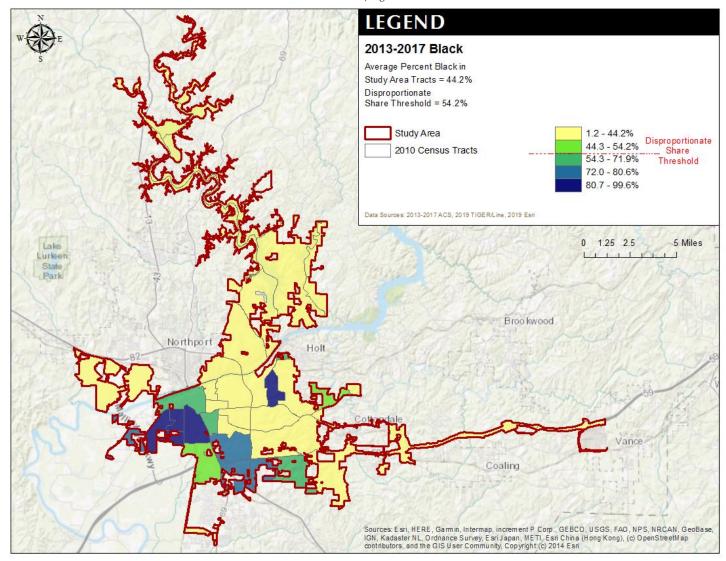
Limited English Proficiency and the language spoken at home are shown in Table IV.5. An estimated 1.2 percent of the population speaks Spanish at home, followed by 0.5 percent speaking Chinese.

Table IV.5 Limited English Proficiency and Language Spoken at Home City of Tuscaloosa 2017 Five-Year ACS				
Number	Country	Number of Persons	Percent of Total Population	
#1 LEP Language	Spanish	1,098	1.2%	
#2 LEP Language	Chinese	459	0.5%	
#3 LEP Language	Arabic	126	0.1%	
#4 LEP Language	Other Indo-European languages	121	0.1%	
#5 LEP Language	German or other West Germanic languages	117	0.1%	
#6 LEP Language	Other Asian and Pacific Island languages	116	0.1%	
#7 LEP Language	Other and unspecified languages	92	0.1%	
#8 LEP Language	Korean	81	0.1%	
#9 LEP Language	Vietnamese	80	0.1%	
#10 LEP Language	Tagalog	66	0.1%	

The geographic distribution of black and Hispanic households are shown in the maps on the following pages. In 2017, there were concentrations of black households in the southwestern part of the City. As seen in Map IV.2, Hispanic households were more heavily concentrated in eastern central Tuscaloosa.

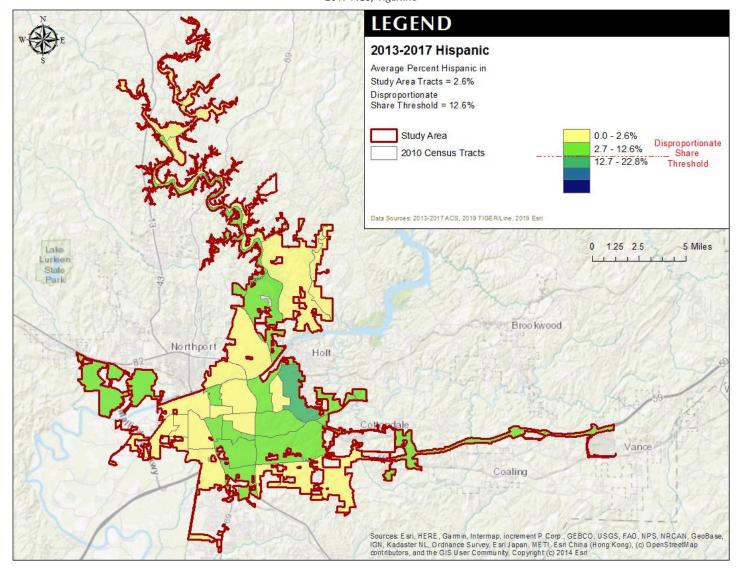
Map IV.1 Black Population

City of Tuscaloosa 2017 ACS, Tigerline



Map IV.2 Hispanic Population

City of Tuscaloosa 2017 ACS, Tigerline



Education

Education and employment data, as estimated by the 2017 ACS, is presented in Table IV.6. In 2017, some 40,964 persons were employed and 3,645 were unemployed. This totaled a labor force of 44,609 persons. The unemployment rate for City of Tuscaloosa was estimated to be 8.2 percent in 2017.

Table IV.6 Employment, Labor Force and Unemployment City of Tuscaloosa 2017 Five-Year ACS Data			
Employment Status 2017 Five-Year ACS			
Employed	40,964		
Unemployed 3,645			
Labor Force	44,609		
Unemployment Rate	8.2%		

In 2017, 92.3 percent of households in the City of Tuscaloosa had a high school education or greater.

Table IV.7 High School or Greater Education City of Tuscaloosa 2017 Five-Year ACS Data		
Education Level	Households	
High School or Greater	32,019	
Total Households 34,700		
Percent High School or Above 92.3%		

As seen in Table IV.8, some 25.0 percent of the population had a high school diploma or equivalent, another 39.0 percent have some college, 16.5 percent have a Bachelor's Degree, and 10.6 percent of the population had a graduate or professional degree.

Table IV.8 Educational Attainment City of Tuscaloosa 2017 Five-Year ACS Data				
Education Level	Population	Percent		
Less Than High School	7,111	9.0%		
High School or Equivalent	19,791	25.0%		
Some College or Associates Degree	30,899	39.0%		
Bachelor's Degree	13,070	16.5%		
Graduate or Professional Degree	8,431	10.6%		
Total Population Above 18 years 79,302 100.0%				

Demographics Summary

The population in Tuscaloosa grew from 78,746 in 2000 to 100,287 in 2017. While the population has been growing, the City has experienced a shift in the racial and ethnic make-up of the City as well, with a slight increase in the proportion of black residents in the City. In 2017, some 25.0 percent of the population had a high school diploma or equivalent, another 39.0 percent have some college, 16.5 percent have a Bachelor's Degree, and 10.6 percent of the population had a graduate or professional degree.

ECONOMICS

The following section describes the economic context for the City of Tuscaloosa. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS). The data from the BEA is only available at the County level and shows the entirety of Tuscaloosa County. The BLS data presented below is specified for the City of Tuscaloosa.

Labor Force

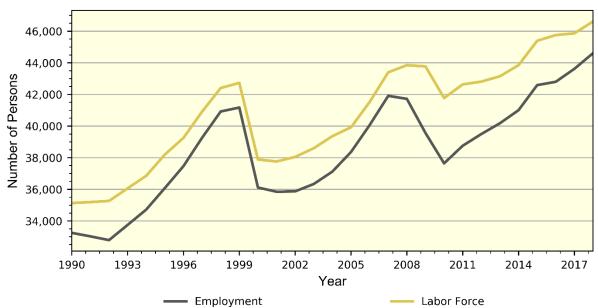
Table IV.9 shows the labor force statistics for City of Tuscaloosa from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 2007 with a rate of 3.4 percent. The highest level of unemployment occurred during 2010 rising to a rate of 9.9 percent. This compared to a statewide low of 3.9 in 2018 and statewide high of 11.0 percent in 2009. Over the last year, the unemployment rate in the City of Tuscaloosa decreased from 4.9 percent in 2017 to 4.3 percent in 2018, which compared to a statewide decrease to 3.9 percent.

	Table IV.9 Labor Force Statistics City of Tuscaloosa 1990 - 2018 BLS Data				
		City of T	uscaloosa		Statewide
Year	Unemployment	Employment	Labor Force	Unemployment Rate	Unemployment Rate
1990	1,884	33,248	35,132	5.4%	6.8%
1991	2,167	33,026	35,193	6.2%	7.3%
1992	2,477	32,789	35,266	7.0%	7.6%
1993	2,311	33,753	36,064	6.4%	7.3%
1994	2,137	34,722	36,859	5.8%	6.2%
1995	2,119	36,084	38,203	5.5%	6.0%
1996	1,784	37,471	39,255	4.5%	5.2%
1997	1,651	39,264	40,915	4.0%	5.0%
1998	1,484	40,925	42,409	3.5%	4.4%
1999	1,559	41,172	42,731	3.6%	4.7%
2000	1,771	36,115	37,886	4.7%	4.6%
2001	1,913	35,848	37,761	5.1%	5.1%
2002	2,178	35,873	38,051	5.7%	5.9%
2003	2,262	36,339	38,601	5.9%	6.0%
2004	2,240	37,124	39,364	5.7%	5.7%
2005	1,564	38,361	39,925	3.9%	4.5%
2006	1,458	40,062	41,520	3.5%	4.0%
2007	1,490	41,912	43,402	3.4%	4.0%
2008	2,129	41,721	43,850	4.9%	5.7%
2009	4,213	39,563	43,776	9.6%	11.0%
2010	4,128	37,644	41,772	9.9%	10.5%
2011	3,882	38,756	42,638	9.1%	9.6%
2012	3,315	39,497	42,812	7.7%	8.0%
2013	2,970	40,179	43,149	6.9%	7.2%
2014	2,848	41,006	43,854	6.5%	6.8%
2015	2,804	42,589	45,393	6.2%	6.1%
2016	2,955	42,802	45,757	6.5%	5.8%
2017	2,244	43,621	45,865	4.9%	4.4%
2018	2,008	44,608	46,616	4.3%	3.9%

Diagram IV.1 shows the employment and labor force for City of Tuscaloosa. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 44,608 persons, with the labor force reaching 46,616, indicating there were a total of 2,008 unemployed persons.



City of Tuscaloosa 1990 – 2017 BLS Data



Unemployment: City of Tuscaloosa

Diagram IV.2 shows the unemployment rate for both the State and City of Tuscaloosa. During the 1990's the average rate for City of Tuscaloosa was 5.1 percent, which compared to 6.0 percent statewide. Between 2000 and 2010 the unemployment rate had an average of 5.3 percent, which compared to 5.6 percent statewide. Since 2010, the average unemployment rate was 6.8 percent. Over the course of the entire period the City of Tuscaloosa had an average unemployment rate that lower than the State, 5.7 percent for City of Tuscaloosa, versus 6.2 statewide.

Earnings: Tuscaloosa County

The Bureau of Economic Analysis (B.E.A.) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.3 shows real average earnings per job for Tuscaloosa County from 1990 to 2017. Over this period the average earning per job for Tuscaloosa County was 47,228 dollars, which was higher than the statewide average of 46,687 dollars over the same period.

Diagram IV.2 Annual Unemployment Rate City of Tuscaloosa

1990 - 2017 BLS Data

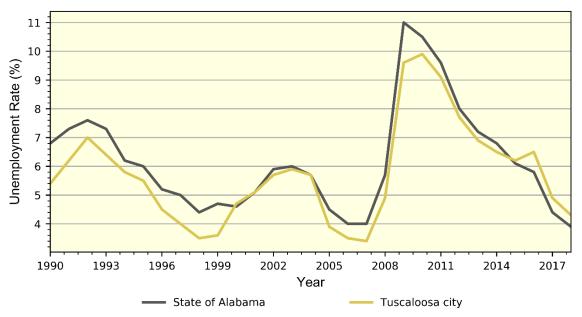


Diagram IV.3 Real Average Earnings Per Job

Tuscaloosa County BEA Data 1990 - 2017

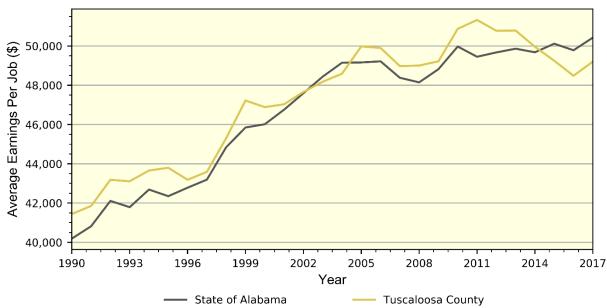
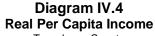
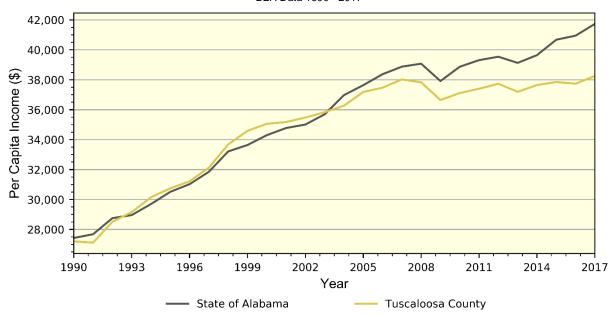


Diagram IV.4 shows real per capita income for the Tuscaloosa County from 1990 to 2017, which is calculated by dividing total personal income from all sources by population. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period, the real per capita income for Tuscaloosa County was 34,656 dollars, which was lower than the statewide average of 35,400 dollars over the same period.



Tuscaloosa County BEA Data 1990 - 2017



Household Incomes and Poverty

Households by income for the 2010 and 2017 5-year ACS are shown in Table IV.10. Households earning more than 100,000 dollars per year represented 17.0 percent of households in 2017, compared to 11.9 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 19.2 percent of households in 2017, compared to 28.4 percent in 2000.

Table IV.10 Households by Income City of Tuscaloosa 2010 & 2017 Five-Year ACS Data						
Incomo	2010 Five-	rear ACS	2017 Five	e-Year ACS		
Income	Households	% of Total	Households	% of Total		
Less than \$15,000	9,282	28.4%	6,658	19.2%		
\$15,000 to \$19,999	2,075	6.3%	2,089	6.0%		
\$20,000 to \$24,999	2,461	7.5%	2,454	7.1%		
\$25,000 to \$34,999	3,441	10.5%	3,742	10.8%		
\$35,000 to \$49,999	4,730	14.5%	4,651	13.4%		
\$50,000 to \$74,999	4,413	13.5%	5,900	17.0%		
\$75,000 to \$99,999	2,413	7.4%	3,320	9.6%		
\$100,000 or More	3,909 11.9% 5,886 17.0%					
Total	32,724	100.0%	34,700	100.0%		

The rate of poverty for City of Tuscaloosa is shown in Table IV.11. In 2017, there were an estimated 20,796 persons living in poverty. This represented a 23.7 percent poverty rate, compared to 23.6 percent poverty in 2000. In 2017, some 8.0 percent of those in poverty were under age 6, and 3.9 percent were 65 or older. The City's Comprehensive Five-year Affordable Housing Study found that college student account for 5 percent of the poverty rate, bringing the poverty rate for the City down to closer to 19 percent.¹⁰

Table IV.11 Poverty by Age City of Tuscaloosa 2000 Census SF3 & 2017 Five-Year ACS Data						
			2017 Five-Year	r ACS		
Age	Persons in Poverty	% of Total	Persons in Poverty	% of Total		
Under 6	1,618	9.8%	1,654	8.0%		
6 to 17	2,362 14.2% 3,278 15.8%					
18 to 64	11,446 69.0% 15,043 72.3%					
65 or Older	1,159 7.0% 821 3.9%					
Total	tal 16,585 100.0% 20,796 100.0%					
Poverty Rate	23.6% . 23.7% .					

Poverty was highest in central Tuscaloosa, as demonstrated by the darkest blues in the map on the following page. These areas saw poverty rates that exceeded 48.6 percent. The outskirts of the City consistently saw lower rates of poverty in 2017.

Economic Summary

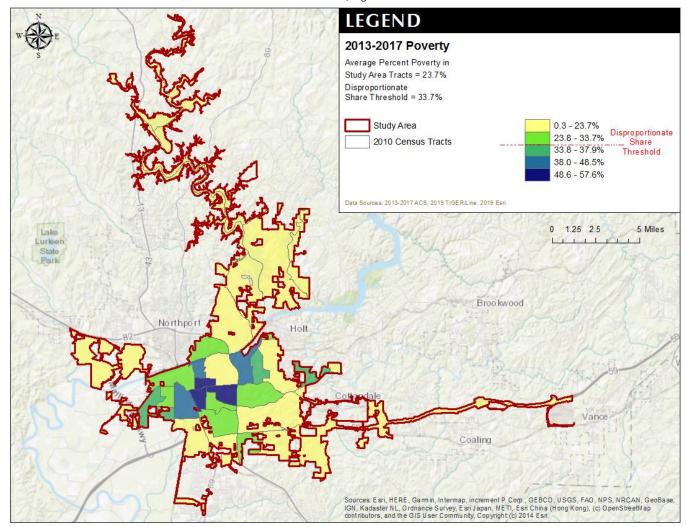
In 2018, unemployment in Tuscaloosa was at 4.3 percent, compared to 3.9 percent for the State of Alabama. This is representative of a labor force of 46,616 people and 44,608 people employed. Real per capita income in Tuscaloosa has lagged behind the state rate in recent years. Household incomes have risen overall in Tuscaloosa, as households with incomes over \$50,000 have risen as a proportion of the population. However, poverty in Tuscaloosa has remained steady, at 23.7 percent in 2017. This represents 20,796 persons living in poverty in the City.

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¹⁰ City of Tuscaloosa, 2018 Comprehensive Five-year Affordable Housing Study, 2018

Map IV.3 2017 Poverty

City of Tuscaloosa 2017 ACS, Tigerline



Housing

Housing Production

The Census Bureau reports building permit authorizations and "per unit" valuation of building permits by city annually. Single-family construction usually represents most residential development in the City. Single-family building permit authorizations in Tuscaloosa increased from 303 authorizations in 2016 to 320 in 2017.

The real value of single-family building permits decreased from 288,046 dollars in 2016 to 286,441 dollars in 2017. Additional details are given in Table IV.12. In 2017, there were 917 total units produced in the City, with 507 of these being multifamily units. This is shown in Diagram IV.5. Single family unit production declined beginning in 2008 and has increased slightly since that time. The value of single-family permits, however, has continued to rise, reaching \$286,441 in 2017. Single-family units account for 51.7 percent of units, while apartments account for 36.6 percent of units. This is shown in Diagram IV.6.

	Table IV.12 Building Permits and Valuation City of Tuscaloosa Census Bureau Data, 1980–2018						
		Authorized Cor	nstruction in Peri	mit Issuing Areas	;		Valuation, 2017\$)
Year	Single-	Duplex	Tri- and	Multi-Family	Total	Single-Family	Multi-Family
	Family	Units	Four-Plex	Units	Units	Units	Units
1980	223	0	8	245	476	84,068	44,608
1981	156	0	4	13	173	70,190	55,593
1982	173	0	60	28	261	61,612	45,567
1983	327	2	4	238	571	72,607	34,196
1984	367	2	32	152	553	72,522	31,601
1985	503	0	8	661	1,172	65,566	36,605
1986	357	0	0	120	477	97,376	39,223
1987	355	0	3	112	470	93,963	37,717
1988	358	0	0	127	485	87,879	40,849
1989	283	0	4	298	585	104,509	34,807
1990	279	32	4	205	520	98,238	41,437
1991	308	2	0	254	564	83,273	41,202
1992	395	2	0	250	647	95,037	56,371
1993	483	2	4	9	498	89,463	35,829
1994	452	0	0	124	576	124,113	71,850
1995	548	0	0	743	1,291	82,213	55,063
1996	573	0	6	374	953	91,351	48,207
1997	424	0	0	366	790	108,558	44,681
1998	459	0	0	140	599	184,787	63,731
1999	539	0	0	55	594	190,962	37,236
2000	430	6	0	121	557	194,822	59,665
2001	511	0	0	416	927	200,592	51,050
2002	486	0	0	606	1,092	202,944	30,497
2003	614	0	0	270	884	191,992	38,216
2004	685	14	0	77	776	172,018	66,547
2005	753	2	0	417	1,172	204,047	65,648
2006	596	0	0	1,399	1,995	216,926	67,765
2007	443	0	4	1,020	1,467	209,239	68,334
2008	262	6	0	721	989	207,235	68,087
2009	207	4	6	235	452	211,467	78,340
2010	222	24	0	247	493	224,116	95,359
2011	213	20	0	341	574	216,199	89,700
2012	335	16	0	389	740	211,746	97,714
2013	417	12	3	426	858	247,546	158,898
2014	286	70	33	843	1,232	252,380	107,570
2015	273	82	16	196	567	280,625	113,580
2016	303	26	44	858	1,231	288,046	102,755
2017	320	28	62	507	917	286,441	99,056

Diagram IV.5 Total Permits by Unit Type

City of Tuscaloosa Census Bureau Data, 1980–2017

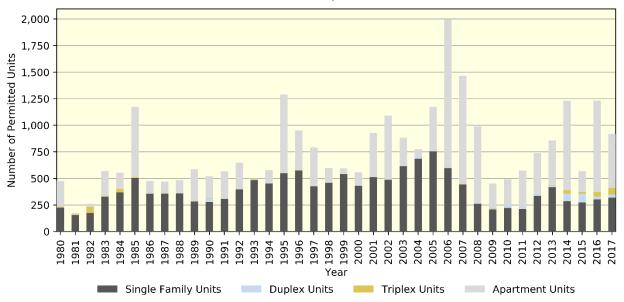
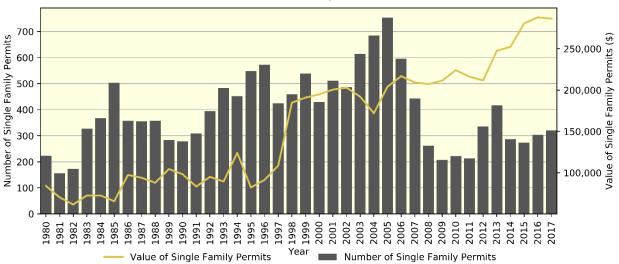


Diagram IV.6 Single-Family Permits

City of Tuscaloosa Census Bureau Data, 1980–2017



Housing Characteristics

Households by type and tenure are shown in Table IV.13. Family households represented 56.5 percent of households, while non-family households accounted for 43.5 percent. These changed from 48.6 percent and 51.4 percent, respectively.

Table IV.13 Household Type by Tenure City of Tuscaloosa 2010 Census SF1 & 2017 Five-Year ACS Data						
Household Type	2010 C	ensus	2017 Five-	ear ACS		
Tiousenoid Type	Households	Households	Households	% of Total		
Family Households	17,592	48.6%	19,616	56.5%		
Married-Couple Family	10,295	58.5%	11,991	61.1%		
Owner-Occupied	7,897	76.7%	8,935	74.5%		
Renter-Occupied	2,398	23.3%	3,056	25.5%		
Other Family	7,297	41.5%	7,625	37.2%		
Male Householder, No Spouse Present	1,418	19.4%	1,342	18.6%		
Owner-Occupied	563	39.7%	573	42.7%		
Renter-Occupied	855	60.3%	769	57.3%		
Female Householder, No Spouse Present	5,879	80.6%	6,283	77.1%		
Owner-Occupied	2,111	35.9%	1,930	30.7%		
Renter-Occupied	3,768	64.1%	4,353	69.3%		
Non-Family Households	18,593	51.4%	15,084	43.5%		
Owner-Occupied	4,741	25.5%	4,956	32.9%		
Renter-Occupied	13,852	74.5%	10,128	67.1%		
Total	36,185	100.0%	34,700	100.0%		

Table IV.14, below, shows housing units by type for 2010 and 2017. In 2010, there were 40,555 housing units, compared with 46,946 in 2017. Single-family units accounted for 51.7 percent of units in 2017, compared to 56.4 percent in 2010. Apartment units accounted for 36.6 percent in 2017, compared to 32.1 percent in 2010.

Table IV.14 Housing Units by Type City of Tuscaloosa 2010 & 2017 Five-Year ACS Data						
2010 Five-Year ACS 2017 Five-Year				ve-Year ACS		
Unit Type	Units	% of Total	Units	% of Total		
Single-Family	22,860	56.4%	24,275	51.7%		
Duplex	1,285	3.2%	1,728	3.7%		
Tri- or Four-Plex	2,594	6.4%	3,019	6.4%		
Apartment	13,009	32.1%	17,184	36.6%		
Mobile Home	807	2.0%	726	1.5%		
Boat, RV, Van, Etc.	0 0% 14 0%					
Total	40,555	100.0%	46,946	100.0%		

Table IV.15 shows housing units by tenure from 2010 to 2017. By 2017, there were 46,946 housing units. An estimated 47.2 percent were owner-occupied, and 26.1 percent were vacant.

Table IV.15 Housing Units by Tenure City of Tuscaloosa 2010 Census & 2017 Five-Year ACS Data						
Tenure	2010	Census	2017 Five	-Year ACS		
renure	Units	% of Total	Units	% of Total		
Occupied Housing Units	36,185	88.6%	34,700	73.9%		
Owner-Occupied	15,312	42.3%	16,394	47.2%		
Renter-Occupied	20,873	57.7%	18,306	52.8%		
Vacant Housing Units 4,657 11.4% 12,246 26.1%						
Total Housing Units	40,842	100.0%	46,946	100.0%		

Table IV.16 shows households by year home built for the 2010 and 2017 5-year ACS data. Housing units built between 2000 and 2009, account for 15.7 percent of households in 2010 and 16.4 percent of households in 2017. Housing units built in 1939 or earlier represented 4.7 percent of households in 2017 and 3.8 percent of households in 2010.

Table IV.16 Households by Year Home Built City of Tuscaloosa 2010 & 2017 Five-Year ACS Data					
Year Built	2010 Five-	Year ACS	2017 Five-Y	ear ACS	
Tear Duilt	Households	% of Total	Households	% of Total	
1939 or Earlier	1,246	3.8%	1,648	4.7%	
1940 to 1949	2,042	6.2%	1,679	4.8%	
1950 to 1959	3,700	11.3%	3,388	9.8%	
1960 to 1969	4,460	13.6%	4,390	12.7%	
1970 to 1979	6,949	21.2%	5,771	16.6%	
1980 to 1989	5,253	16.1%	4,450	12.8%	
1990 to 1999	3,934	12.0%	5,264	15.2%	
2000 to 2009	5,140	15.7%	5,690	16.4%	
2010 or Later			2,420	7.0%	
Total	32,724	100.0%	34,700	100.0%	

The distribution of unit types by race is shown in Table IV.17. An estimated 67.2 percent of white households occupy single-family homes, while 57.6 percent of black households do. Some 25.8 percent of white households occupied apartments, while 26.3 percent of black households do. An estimated 49.4 percent of Asian households and 39.6 percent of American Indian households occupy single-family homes.

Table IV.17 Distribution of Units in Structure by Race City of Tuscaloosa 2017 Five-Year ACS Data							
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	67.2%	57.6%	39.6%	49.4%	0%	28.8%	46.5%
Duplex	1.8%	4.4%	0%	0%	0%	18.6%	4.7%
Tri- or Four-Plex	3.8%	10.1%	14.9%	5.8%	0%	0%	0%
Apartment	25.8%	26.3%	7.9%	44.8%	100.0%	14.7%	44.7%
Mobile Home	1.4%	1.6%	37.6%	0%	0%	28.8%	4.1%
Boat, RV, Van, Etc.	0%	0%	0%	0%	0%	9.0%	0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant units between 2010 and 2017 are shown in Table IV.18. By 2017, for rent units accounted for 9.8 percent of vacant units, while for sale units accounted for 0.8 percent. "Other" vacant units accounted for 12.7 percent of vacant units, representing a total of 1,553 "other" vacant units. The 2019 Rental Vacancy Survey, found in **Section IV.J. 2019 Rental Vacancy Survey**, found that the vacancy rate for rentals was closer to 6.4 percent in 2019.

Table IV.18 Disposition of Vacant Housing Units City of Tuscaloosa 2010 Census & 2017 Five-Year ACS Data						
2010 Census 201				2017 Five-Year ACS		
Disposition	Units	% of Total	Units	% of Total		
For Rent	2,612	56.1%	1,197	9.8%		
For Sale	447	9.6%	97	0.8%		
Rented Not Occupied	93	2.0%	408	3.3%		
Sold Not Occupied	139	3.0%	115	0.9%		
For Seasonal, Recreational, or Occasional Use	663	14.2%	8,876	72.5%		
For Migrant Workers	17	0.4%	0	0%		
Other Vacant	686	14.7%	1,553	12.7%		
Total	4,657	100.0%	12,246	100.0%		

The age of a structure influences its value. As shown in Table IV.19, structures built in 1939 or earlier had a median value of, 198,100 while structures built between 1950 and 1959 had a median value of \$135,600 and those built between 1990 and 1999 had a median value of \$241,800. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of \$306,900 and \$425,900 respectively. The total median value in the City of Tuscaloosa was \$172,000.

The City's recent housing study found that housing prices are inflated due to the fluctuation of the student population.¹¹ This results in lower vacancy rates and higher rental prices in the City.

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¹¹ City of Tuscaloosa, 2018 Comprehensive Five-year Affordable Housing Study, 2018

Table IV.19 Owner Occupied Median Value by Year Structure Built City of Tuscaloosa 2017 5-Year ACS Data				
Year Structure Built	Median Value			
1939 or earlier	198,100			
1940 to 1949	123,000			
1950 to 1959	135,600			
1960 to 1969	139,900			
1970 to 1979	156,100			
1980 to 1989	204,100			
1990 to 1999	241,800			
2000 to 2009	251,600			
2010 to 2013	306,900			
2014 or later	425,900			
Median Value	172,000			

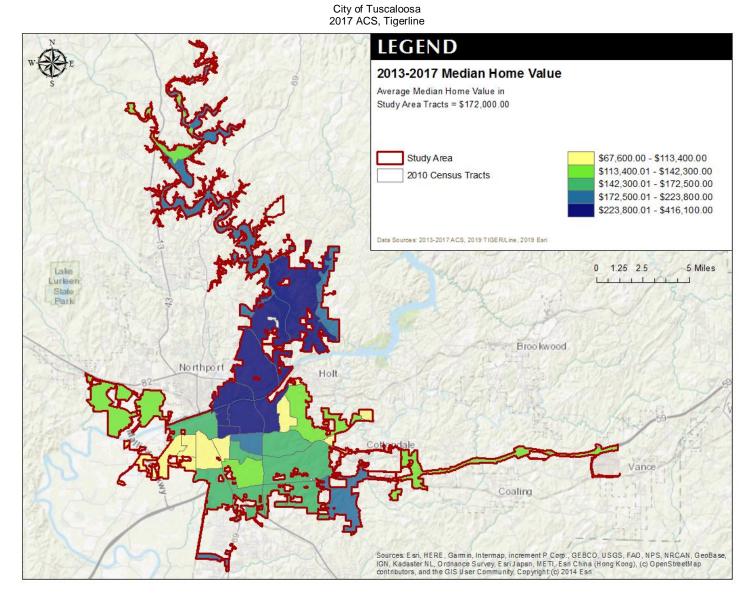
Median home values were consistently higher in the northern portion of the City, seeing values above \$223,800. Meanwhile areas in central Tuscaloosa saw median home values below \$113,400. Areas in western and northern Tuscaloosa saw the lowest median contract rents, at \$503 and under, while areas in southern and northcentral Tuscaloosa saw the highest median contract rents. Additional information about rental housing costs can be found in **Section IV.J. Rental Vacancy Survey.**

Housing Summary

The City has seen a regrowth in housing production since experiencing a decline in 2009 and 2010. In 2017, there were 917 total units produced in the City, with 507 of these being multifamily units. Single family unit production declined beginning in 2008 and has increased slightly since that time. The value of single-family permits, however, has continued to rise, reaching \$286,441 in 2017. Single-family units account for 51.7 percent of units, while apartments account for 36.6 percent of units.

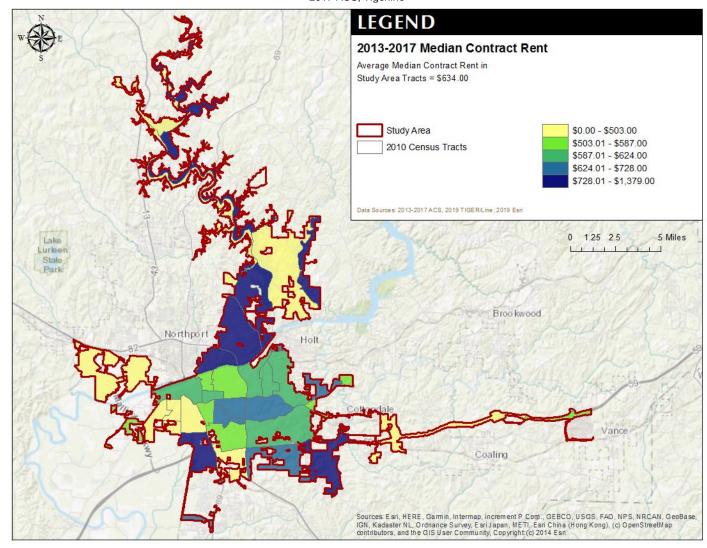
Since 2010, the City has seen an increase in the number of vacant units, resulting in vacant units accounting for 26.1 percent of all units in 2017. The largest proportion of these vacant units is those for seasonal, recreational, or occasional use, which accounted for 72.5 percent of vacant units in 2017.

Map IV.4
Median Home Value
City of Tuscaloosa



Map IV.5
Median Contract Rent

City of Tuscaloosa 2017 ACS, Tigerline



B. SEGREGATION AND INTEGRATION

The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

A Technical Note on the Dissimilarity Index Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where *i* indexes a geographic unit, *j* is the jth jurisdiction, *W* is group one and *B* is group two, and *N* is the number of geographic units, starting with *i*, in jurisdiction j. 12

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD's methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.¹³

As a general rule, HUD considers the thresholds appearing in the table below to indicate low, moderate, and high levels of segregation:

Interpreting the dissimilarity index											
Measure	Values	Description									
Dissimilarity Index	<40	Low Segregation									
[range 0-100]	40-54	Moderate Segregation									
	>55	High Segregation									

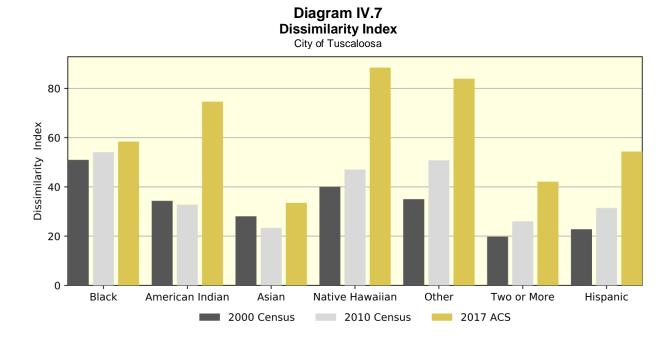
2020 City of TuscaloosaFinal ReportAnalysis of Impediments33March 9, 2020

¹² Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

¹³ Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.

Segregation Levels

Diagram IV.7 shows the rate of segregation by race and ethnicity for 2000, 2010, and 2017. During this time period, black households have had an increasing level of segregation, resulting in a high level of segregation in 2017. American Indian households had a high level of segregation in 2017, which has grown from a low level in 2000. The level of segregation for Asian households has also increased from 2000 to 2017 but remains a low level of segregation. Native Hawaiian households increased significantly in terms of segregation, according to the dissimilarity index, resulting in a high level of segregation in 2017. "Other" race households had a high level of segregation after seeing an increase in the levels of segregation since 2000. Two or more race households are also seeing a rate of increase in the dissimilarity index resulting in a moderate level of segregation. Hispanic households also saw increasing levels of segregation, resulting in a high level of segregation by 2017.



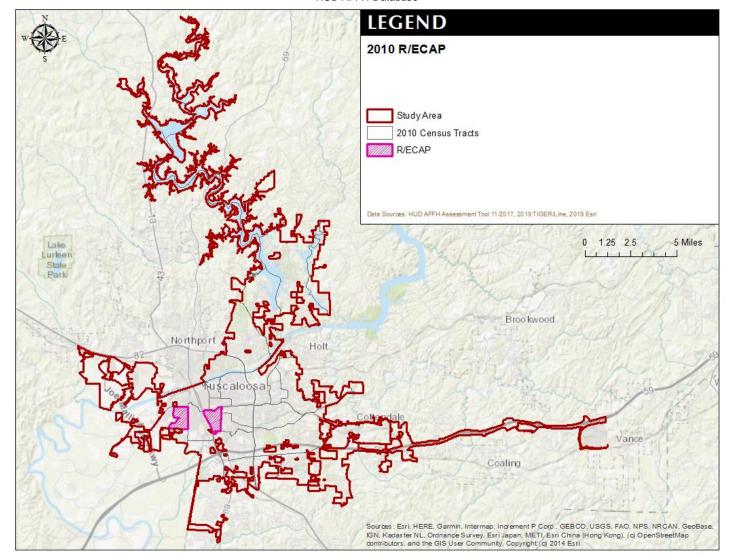
C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

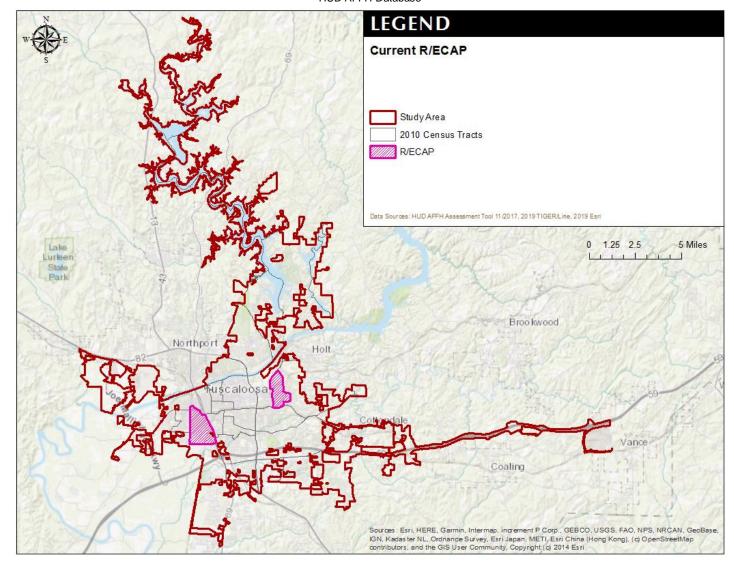
R/ECAPs over Time

In 2010, there were two (2) R/ECAPs in Tuscaloosa. In 2017, there were also two (2) R/ECAPs in the City, but these areas had shifted, as shown in Maps IV.6 and IV.7.

Map IV.6 2010 R/ECAPs



Map IV.7 Current R/ECAPs



D. DISPARITIES IN ACCESS TO OPPORTUNITY

The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

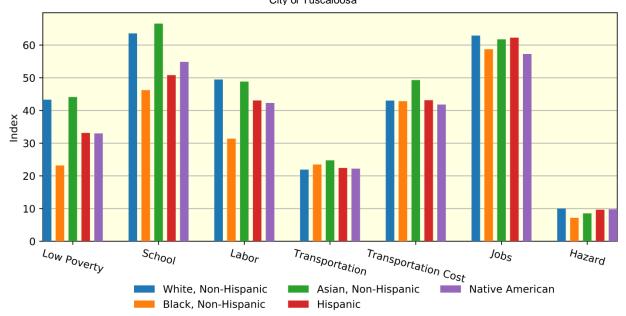
Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

- **Low Poverty** A measure of the degree of poverty in a neighborhood, at the Census tract level.
- ➤ <u>School Proficiency</u> School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- <u>Labor Market Engagement</u> Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- ➤ <u>Low Transportation Cost</u> Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health summarizes potential exposure to harmful toxins at a neighborhood level

Diagram IV.8 shows the level of access to opportunities by race and ethnicity. Black, Hispanic, and Native American households have lower access to Low Poverty areas, compared to other races and ethnicities in Tuscaloosa. Black and Hispanic households also have markedly lower access to school proficiency. Black households have lower access to labor market engagement. There is little variance by race for access to transportation trips, transportation cost, job proximity, and environmental health.

Diagram IV.8 Access to Opportunity City of Tuscaloosa

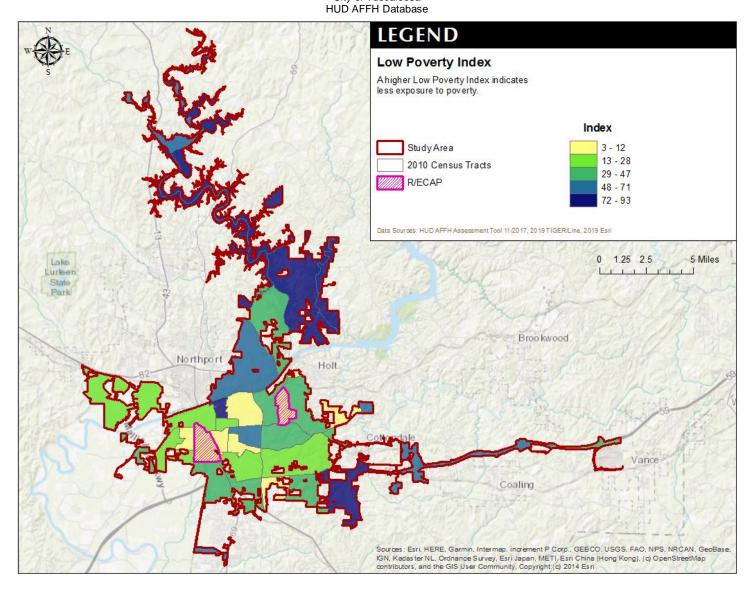


LOW POVERTY INDEX

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The highest low-poverty index ratings are seen in the northern and southern parts of Tuscaloosa, while the lowest scores are in central and eastern Tuscaloosa. As one would expect, the two R/ECAPs in the City are in the areas with lower low poverty index ratings (or higher levels of poverty).

Map IV.8 Low Poverty City of Tuscaloosa



SCHOOL PROFICIENCY INDEX

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

School Proficiency indices are highest are seen in the northern portions of Tuscaloosa while the lowest scores are in central parts of the City. The highest index ratings are above 78 on a scale of 100, while the lowest are below 24. These are shown in Map IV.9. The two R/ECAPS are in areas with moderate levels of school proficiency.

JOBS PROXIMITY INDEX

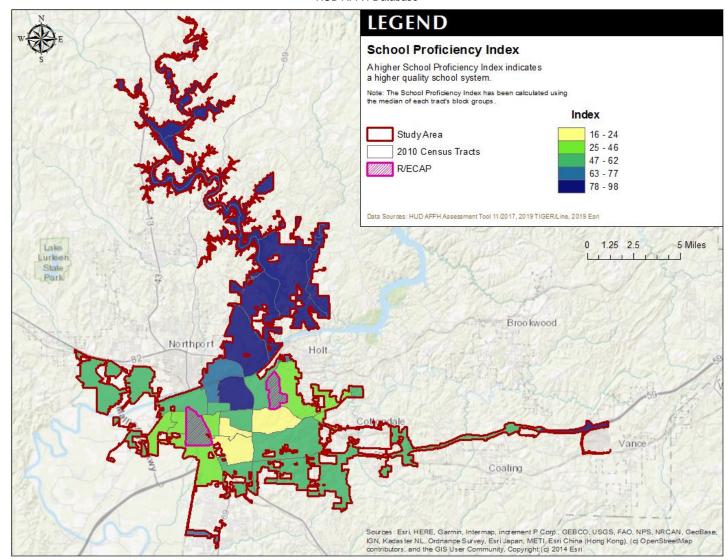
The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.10. Job proximity varied widely across the City. As one would expect, the areas closest to the city center had the highest job proximity index ratings. Job Proximity index ratings were fairly even for all racial and ethnic groups in the City, showing very little variation across racial and ethnic groups.

LABOR MARKET ENGAGEMENT INDEX

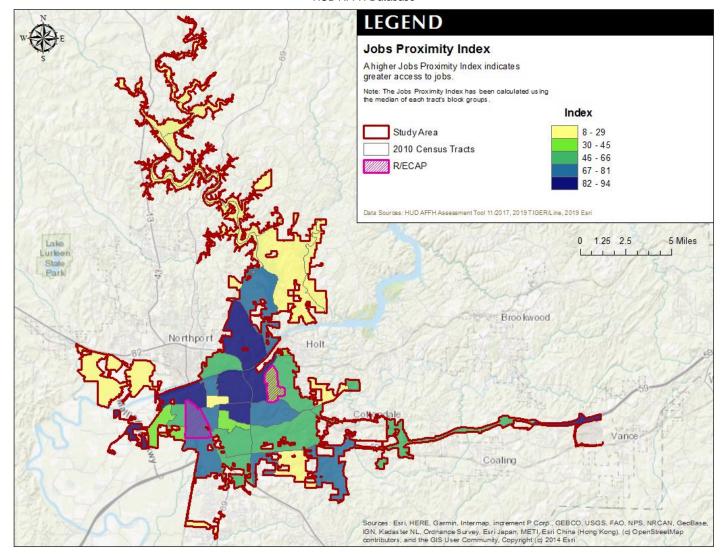
The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.11, shows the labor market engagement for the study area. Areas in the northern and southern parts of the study area had the highest rate of labor market engagement, above 74 index ratings, while areas in the central part had the lowest ratings, below 15 index ratings. Black and Hispanic households have a lower level of access to labor engagement compared to other racial and ethnic groups in the City. The two R/ECAPS are in areas with low levels of labor market engagement.

Black households tended to have lower access to labor market engagement, which may depend on a variety of factors, including education and unemployment levels.

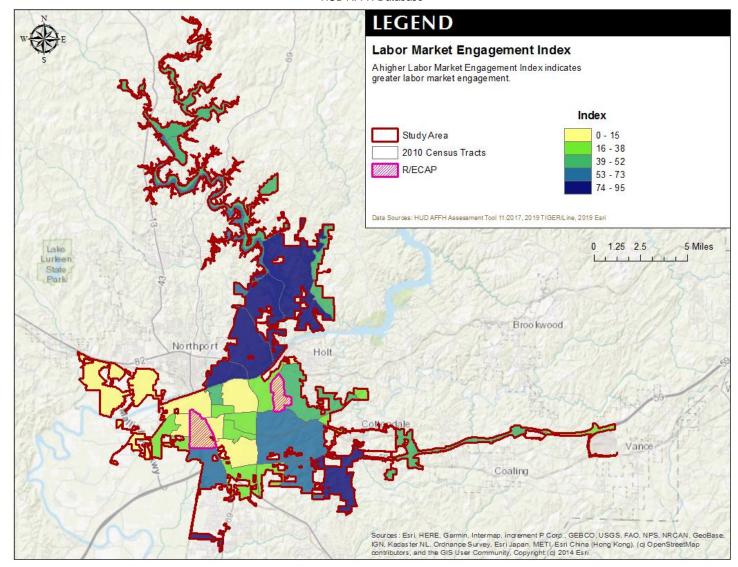
Map IV.9 School Proficiency



Map IV.10
Job Proximity
City of Tuscaloosa



Map IV.11 Labor Market Engagement



TRANSPORTATION TRIP INDEX

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in central Tuscaloosa, while the outskirts of the City saw lower rates of transit use.

The Tuscaloosa Transit Authority serves as a public transportation service for the City. Transit services are available primarily in the downtown area, but are limited in other areas of the City, as demonstrated by the use in the Transit map. The Authority serves persons with disabilities and is ADA accessible.¹⁴

LOW TRANSPORTATION COST INDEX

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs were lowest in the areas in and adjacent to the City of Tuscaloosa center. This is shown in Map IV.13. As with transit trips, however, there is little difference among racial and ethnic groups in the City.

ENVIRONMENTAL HEALTH INDEX

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The areas in the central parts of Tuscaloosa tended to have the lowest Environmental Health index ratings, while areas in the outer part of the study area had the highest ratings. Overall, this index does not vary substantially by race or ethnicity. The two R/ECAPS are in areas with low to moderate levels of environmental health.

The Tuscaloosa County Health Department works to help ensure that County residents have access to healthy environments. In 2015, the Department conducted 3,130 inspections of restaurants, schools, and other food service and lodging establishments including child care centers to ensure standards in environmental health are maintained.¹⁵

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

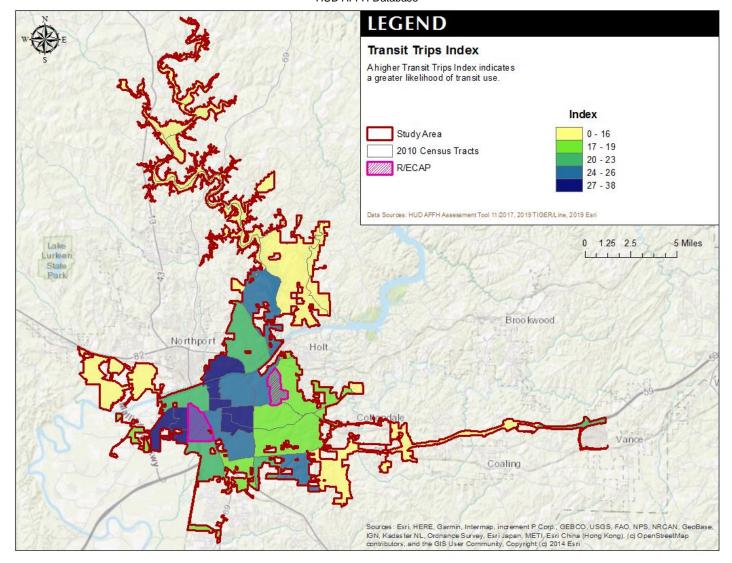
The degree to which residents had access to low poverty areas, school proficiency, and labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for black and Hispanic households in the City of Tuscaloosa. Other measures of opportunity (job proximity, use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

14

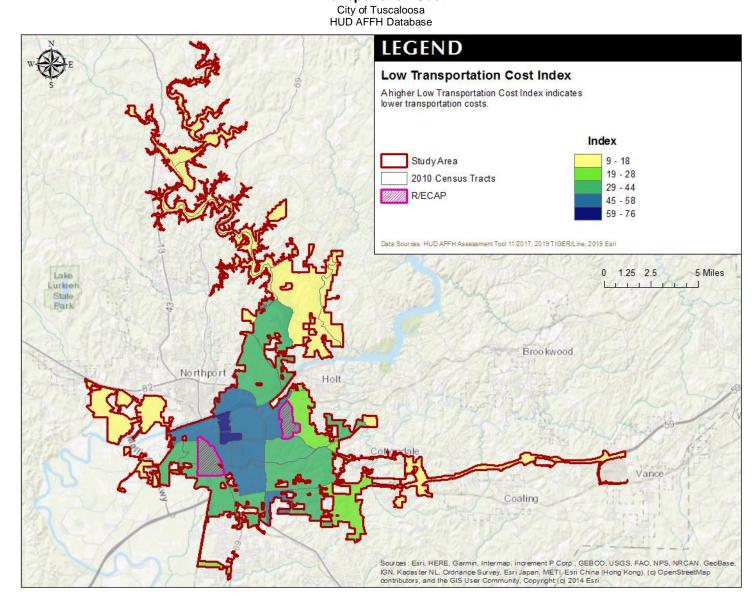
¹⁴ http://tuscaloosatransit.com/

¹⁵ https://www.alabamapublichealth.gov/tuscaloosa/

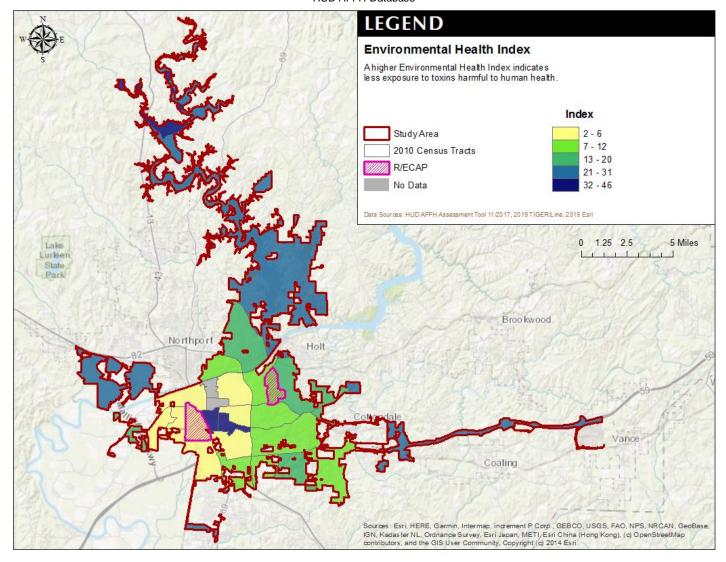
Map IV.12 Transit Trips City of Tuscaloosa



Map IV.13
Transportation Cost
City of Tuscaloosa



Map IV.14 Environmental Health



E. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as "housing problems". For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Overcrowding

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.20. In 2017, an estimated 1.3 percent of households were overcrowded, and an additional 0.6 percent was severely overcrowded.

Table IV.20 Overcrowding and Severe Overcrowding City of Tuscaloosa 2010 & 2017 Five-Year ACS Data											
No Overcrowding Overcrowding Severe Overcrowding											
Data Source	Households	% of Total	Households	% of Total	Households	% of Total	Total				
Owner											
2010 Five-Year ACS	15,521	99.1%	120	0.8%	25	0.2%	15,666				
2017 Five-Year ACS	16,227	99.0%	143	0.9%	24	0.1%	16,394				
			Renter								
2010 Five-Year ACS	16,746	98.2%	235	1.4%	77	0.5%	17,058				
2017 Five-Year ACS	17,821	97.4%	311	1.7%	174	1.0%	18,306				
			Total								
2010 Five-Year ACS	32,267	98.6%	355	1.1%	102	0.3%	32,724				
2017 Five-Year ACS	34,048	98.1%	454	1.3%	198	0.6%	34,700				

Incomplete Plumbing and Kitchen Facilities

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

There were a total of 92 households with incomplete plumbing facilities in 2017, representing 0.3 percent of households in the City of Tuscaloosa. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2010.

Table IV.21											
Households with Incomplete Plumbing Facilities											
	of Tuscaloosa										
2010 and 201	17 Five-Year ACS Data										
Households 2010 Five-Year ACS 2017 Five-Year ACS											
With Complete Plumbing Facilities	32,610	34,608									
Lacking Complete Plumbing Facilities	114	92									
Total Households	32,724	34,700									
Percent Lacking	0.3%	0.3%									

There were 192 households lacking complete kitchen facilities in 2017, compared to 261 households in 2010. This was a change from 0.8 percent of households in 2010 to 0.6 percent in 2017.

Table IV.22 Households with Incomplete Kitchen Facilities City of Tuscaloosa 2010 and 2017 Five-Year ACS Data										
Households	2010 Five-Year ACS	2017 Five-Year ACS								
With Complete Kitchen Facilities	32,463	34,508								
Lacking Complete Kitchen Facilities	261	192								
Total Households	32,724	34,700								
Percent Lacking	0.8%	0.6%								

Cost Burdens

Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In the City of Tuscaloosa 17.6 percent of households had a cost burden and 20.0 percent had a severe cost burden. Some 21.3 percent of renters were cost burdened, and 28.7 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 5.8 percent and a severe cost burden rate of 4.8 percent. Owner occupied households with a mortgage had a cost burden rate of 17.3 percent, and severe cost burden at 12.9 percent.

			Ta	able IV.2	3									
		Cost Bu	urden and Se	vere Cos	t Burden by	Tenure								
	City of Tuscaloosa													
	2010 & 2017 Five-Year ACS Data													
Less Than 30% 31%-50% Above 50% Not Computed														
Data Source	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	Total					
Owner With a Mortgage														
2010 Five-Year ACS	ar ACS 6,162 61.90% 2,217 22.30% 1,550 15.60% 24 0.20% 9													
2017 Five-Year ACS	2017 Five-Year ACS 7,551 69.30% 1,881 17.30% 1,410 12.90% 60 0.60% 10													
			Owner V	Vithout a M	ortgage									
2010 Five-Year ACS	4,815	84.30%	386	6.80%	441	7.70%	71	1.20%	5,713					
2017 Five-Year ACS	4,817	87.70%	317	5.80%	262	4.80%	96	1.70%	5,492					
				Renter										
2010 Five-Year ACS	5,427	31.80%	3,607	21.10%	6,051	35.50%	1,973	11.60%	17,058					
2017 Five-Year ACS	7,482	40.90%	3,907	21.30%	5,256	28.70%	1,661	9.10%	18,306					
				Total										
2010 Five-Year ACS	16,404	50.10%	6,210	19.00%	8,042	24.60%	2,068	6.30%	32,724					
2017 Five-Year ACS	19,850	57.20%	6,105	17.60%	6,928	20.00%	1,817	5.20%	34,700					

Housing Problems by Income

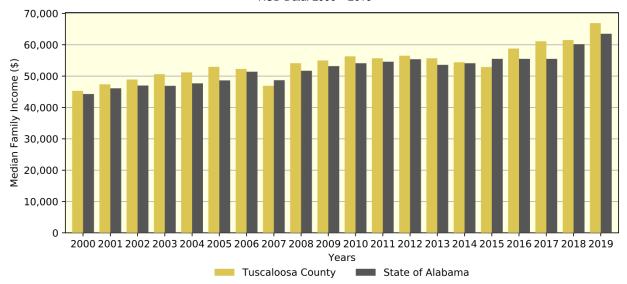
Table IV.24 shows the HUD calculated Median Family Income (MFI) for a family of four for Tuscaloosa County. As can be seen in 2019 the MFI was 66,900 dollars, which compared to 63,500 dollars for the State of Alabama.

Table IV.25, on the following page, shows Comprehensive Housing Affordability Strategy (CHAS) data for housing problems by tenure and income. As can be seen there are a total of 2,165 owner-occupied and 3,075 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 1,725 owner-occupied 5,260 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 18,950 households without a housing problem.

Table IV.24 Median Family Income Tuscaloosa County 2000–2019 HUD MFI											
Year	State of Year MFI Wyoming MFI										
2000	45,300	44,300									
2001	47,400	46,100									
2002	48,900	47,000									
2003	50,600	46,900									
2004	51,200	47,700									
2005	52,950	48,650									
2006	52,300	51,400									
2007	46,900	48,700									
2008	54,100	51,700									
2009	55,000	53,200									
2010	56,300	54,100									
2011	55,700	54,600									
2012	56,500	55,400									
2013	55,700	53,600									
2014	54,400	54,100									
2015	52,900	55,500									
2016	58,800	55,500									
2017	61,100	55,500									
2018	61,500	60,200									
2019	66,900	63,500									

Diagram IV.9 Estimated Median Family Income

Tuscaloosa County vs. Alabama HUD Data: 2000 – 2019



	Ta	able IV.25				
Hous	ing Problem	s by Incom	e and Tenu	re		
	City	of Tuscaloosa				
	2010–201	18 HUD CHAS [Data			
Housing Problem	Less Than	30% - 50% MFI	50% - 80%	80% - 100% MFI	Greater than 100% MFI	Total
	30% MFI	ner-Occupied	MFI	IVIFI	100% WIFI	
Lacking complete plumbing or kitchen facilities	4	20	0	10	10	44
Severely Overcrowded with > 1.51 people per		20	U	10	10	44
room (and complete kitchen and plumbing)	0	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	20	4	30	54
Housing cost burden greater than 50% of income (and none of the above problems)	595	555	415	75	85	1,725
Housing cost burden greater than 30% but less						
than 50% of income (and none of the above problems)	165	210	655	340	795	2,165
Zero/negative income (and none of the above problems)	195	0	0	0	0	195
Has none of the 4 housing problems	155	395	1,240	850	9,025	11,665
Total	1,114	1,180	2,330	1,279	9,945	15,848
Total		ter-Occupied	2,000	1,270	5,546	10,040
Lacking complete plumbing or kitchen facilities	25	0	90	40	55	210
Severely Overcrowded with > 1.51 people per	25	U	90	40	ວວ	210
room (and complete kitchen and plumbing)	15	45	50	10	20	140
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	115	110	65	4	30	324
Housing cost burden greater than 50% of income (and none of the above problems)	3,845	1,055	305	10	45	5,260
Housing cost burden greater than 30% but less						
than 50% of income (and none of the above problems)	350	1,315	1,080	255	75	3,075
Zero/negative income (and none of the above problems)	340	0	0	0	0	340
Has none of the 4 housing problems	490	740	1,290	1,180	3,585	7,285
Total	5,180	3,265	2,880	1,499	3,810	16,634
	•	Total		· · · · · · · · · · · · · · · · · · ·	,	,
Lacking complete plumbing or kitchen facilities	29	20	90	50	65	254
Severely Overcrowded with > 1.51 people per	15	45	50	10	20	140
room (and complete kitchen and plumbing)	15	45	50	10	20	140
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	115	110	85	8	60	378
Housing cost burden greater than 50% of income	4.440	4.040	700	65	400	0.005
(and none of the above problems)	4,440	1,610	720	85	130	6,985
Housing cost burden greater than 30% but less						
than 50% of income (and none of the above problems)	515	1,525	1,735	595	870	5,240
Zero/negative income (and none of the above	535	0	0	0	0	535
problems) Has none of the 4 housing problems	645	1,135	2,530	2,030	12,610	18,950
Total	6,294	4,445	5,210	2,778	13,755	32,482
I Viui	0,234	7,770	J,2 10	2,110	10,700	JZ,7UZ

ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 1988¹⁶. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

- 1. The institution must be a bank, credit union, or savings association;
- 2. The total assets must exceed the coverage threshold;¹⁷
- 3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
- 4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
- 5. The institution must be federally insured or regulated; and
- 6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

- 1. The institution must be a for-profit organization;
- 2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
- 4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- 1. If they are HOEPA loans;
- 2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- 3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2017, the most recent year for which these data are available.

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¹⁶ Prior to that year, Congress had to periodically reauthorize the law.

¹⁷ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table IV.26 shows the purpose of loan by year for Tuscaloosa from 2008 to 2017. As seen therein, there were over 35,050 loans during this time period, of these some 14,446 were for home purchases. In 2017, there were 3,087 loans city-wide, of which 1,871 were for home purchases.

Table IV.26 Purpose of Loan by Year City of Tuscaloosa 2008–2017 HMDA Data											
Purpose	2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Tot										
Home Purchase	1,627	1,304	1,202	1,231	1,252	1,404	1,407	1,496	1,652	1,871	14,446
Home Improvement	241	107	110	105	136	154	135	157	167	165	1,477
Refinancing	2,237	2,899	2,278	1,700	2,563	2,141	1,244	1,443	1,571	1,051	19,127
Total	4,105	4,310	3,590	3,036	3,951	3,699	2,786	3,096	3,390	3,087	35,050

Table IV.27 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 83.2 percent between 2008 and 2017, and for 81.0 percent in 2017 alone.

	Table IV.27 Occupancy Status for Applications												
	City of Tuscaloosa												
2008–2017 HMDA Data Status 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Total													
Owner-Occupied	33,182	3,763	3,144	2,595	3,311	3,042	2,245	2,548	2,850	2,502	29,182		
Not Owner-Occupied	891	534	440	438	628	648	537	545	540	585	5,786		
Not Applicable	32	13	6	3	12	9	4	3	0	0	82		
Total	4,105	4,310	3,590	3,036	3,951	3,699	2,786	3,096	3,390	3,087	35,050		

Owner-occupied home purchase loan applications by loan types are shown in Table IV.28. Between 2008 and 2017, some 53.1 percent of home loan purchases were conventional loans, and 34.3 percent were FHA insured.

	Table IV.28 Owner-Occupied Home Purchase Loan Applications by Loan Type												
City of Tuscaloosa													
2008–2017 HMDA Data Loan Type 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Tota													
Conventional	634	518	459	546	574	631	625	618	748	880	6,233		
FHA - Insured	480	511	513	436	301	285	229	337	479	450	4,021		
VA - Guaranteed	46	65	56	77	59	77	91	103	111	124	809		
Rural Housing Service or Farm Service Agency	2	0	1	1	112	179	205	147	5	14	666		
Total	1,162	1,094	1,029	1,060	1,046	1,172	1,150	1,205	1,343	1,468	11,729		

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution;
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant;
- "Application denied by financial institution," which defines a situation wherein the loan application failed;

• "Application withdrawn by applicant," which means that the applicant closed the application process;

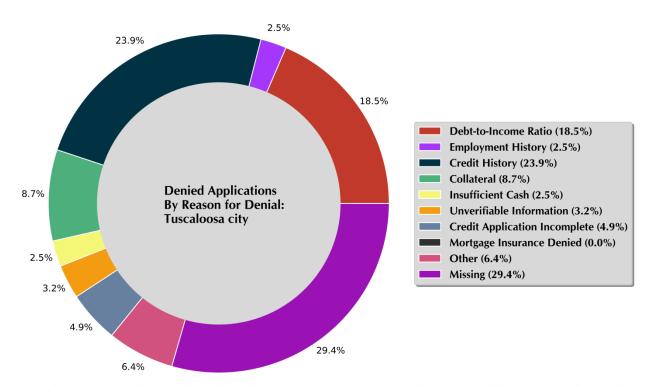
- "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.29, just over 6,077 home purchase loan applications were originated over the 2008-2017 period, and 771 were denied.

	Table IV.29 Loan Applications by Action Taken											
City of Tuscaloosa 2008–2017 HMDA Data												
Action 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Total												
Loan Originated	574	510	510	536	535	591	597	649	747	828	6,077	
Application Approved but not Accepted	22	19	15	15	21	20	14	16	8	29	179	
Application Denied	77	47	70	57	73	99	76	88	106	78	771	
Application Withdrawn by Applicant	54	44	45	37	44	55	88	79	92	125	663	
File Closed for Incompleteness	17	13	14	9	11	25	17	4	8	23	141	
Loan Purchased by the Institution	418	461	375	406	361	382	357	368	382	385	3,895	
Preapproval Request Denied	0	0	0	0	1	0	0	0	0	0	1	
Preapproval Approved but not Accepted	0	0	0	0	0	0	1	1	0	0	2	
Total	1,162	1,094	1,029	1,060	1,046	1,172	1,150	1,205	1,343	1,468	11,729	

The most common reasons cited in the decision to deny one of these loan applications related to the credit history ratio of the prospective homeowner, as shown in Table IV.30. Debt-to-income ratio and collateral were also commonly given as reasons to deny home purchase loans. These are illustrated in the figure on the following page.

	Table IV.30											
	Loan Applications by Reason for Denial											
City of Tuscaloosa												
2008–2017 HMDA Data												
Denial Reason 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Total												
Debt-to-Income Ratio	9	7	13	9	14	22	18	20	19	12	143	
Employment History	2	0	3	1	0	3	1	3	6	0	19	
Credit History	23	20	22	9	18	29	19	14	18	12	184	
Collateral	1	3	9	7	7	8	4	5	11	12	67	
Insufficient Cash	1	1	3	2	1	4	2	2	3	0	19	
Unverifiable Information	3	2	3	0	1	1	3	8	3	1	25	
Credit Application Incomplete	4	2	3	1	3	3	5	6	6	5	38	
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0	0	0	
Other	7	4	3	7	9	4	0	6	5	4	49	
Missing	27	8	11	21	20	25	24	24	35	32	227	
Total	77	47	70	57	73	99	76	88	106	78	771	



Denial rates were observed to differ by race and ethnicity, as shown in Table IV.31. While white applicants had a denial rate of 6.8 over the period from 2008 through 2017, black applicants had a denial rate of 21.3 percent. American Indian applicants also had a denial rate higher than the average, at 25.0 percent versus 11.3 percent for the whole City. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 14.3 percent versus 10.6 percent.

Table IV.31 Denial Rates by Race/Ethnicity of Applicant											
City of Tuscaloosa											
					4–2017 HN	/IDA Data					
Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Average
American Indian	66.7%	%	0.0%	0.0%	0.0%	%	0.0%	0.0%	33.3%	33.3%	25.0%
Asian	23.1%	10.0%	0.0%	0.0%	18.2%	4.5%	12.5%	0.0%	5.3%	6.2%	7.6%
Black	14.5%	13.1%	22.4%	21.7%	25.0%	36.6%	26.5%	22.2%	19.1%	15.5%	21.3%
Pacific Islander	0.0%	0.0%	0.0%	%	%	100.0%	0.0%	0.0%	0.0%	100.0%	20.0%
White	7.3%	5.0%	7.2%	5.3%	7.5%	7.3%	5.6%	8.0%	9.1%	5.5%	6.8%
Not Available	35.6%	25.6%	26.5%	15.8%	19.0%	18.8%	8.3%	26.3%	23.1%	14.3%	23.1%
Not Applicable	%	%	%	50.0%	%	%	%	%	0.0%	0.0%	12.5%
Average	11.8%	8.4%	12.1%	9.6%	12.0%	14.3%	11.3%	11.9%	12.4%	8.6%	11.3%
Hispanic	9.1%	33.3%	30.8%	0.0%	25.0%	25.0%	7.1%	5.9%	22.2%	0.0%	14.3%
Non-Hispanic	10.0%	7.0%	11.2%	9.5%	11.7%	13.7%	11.3%	11.8%	11.5%	8.2%	10.6%

As shown in Table IV.32, the denial rate for prospective female homeowners was 13.7 percent, over 3.6 percentage points higher than the denial rate for male applicants at 9.3 percent. Denial rates for male and female applicants differed considerably by year, but each year the rate of female denials were higher than that of males.

Table IV.32 Denial Rates by Gender of Applicant City of Tuscaloosa 2008–2017 HMDA Data						
Year	Male	Female	Not Available	Not Applicable	Average	
2008	8.4%	13.8%	50.0%	%	11.8%	
2009	6.7%	9.0%	31.8%	%	8.4%	
2010	9.6%	15.1%	31.2%	%	12.1%	
2011	8.7%	10.2%	20.0%	50.0%	9.6%	
2012	9.7%	15.8%	27.3%	%	12.0%	
2013	13.8%	14.7%	20.8%	%	14.3%	
2014	7.7%	18.1%	16.7%	%	11.3%	
2015	9.2%	18.2%	20.0%	%	11.9%	
2016	10.4%	14.1%	32.1%	0.0%	12.4%	
2017	8.0%	8.7%	22.2%	0.0%	8.6%	
Average	9.3%	13.7%	29.4%	12.5%	11.3%	

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- 1. If they are HOEPA loans;
- 2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- 3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.33, some 6,077 loans between 2008 and 2017 were HALs, accounting for 1.1 percent. The highest rate of HAL loans was seen in 2008, at 6.1 percent, which fell to 0.0 percent by 2013.

Table IV.33 Originated Owner-Occupied Loans by HAL Status											
					City of Tuso 08–2017 HI						
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
HAL	35	17	2	6	6	0	0	3	0	0	69
Other	539	493	508	530	529	591	597	646	747	828	6008
Total	574	510	510	536	535	591	597	649	747	828	6,077
Percent HAL	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%

F. PUBLICLY SUPPORTED HOUSING ANALYSIS

There are a variety of types and locations of public housing units within the City of Tuscaloosa. According to HUD's AFFH data, there are 3,557 total publicly supported units in the City. Of these, some 895 are public housing units, 770 are Project Based Section 8, some 24 are other HUD Multifamily units, and 1,868 are Housing Choice Vouchers.

Table IV.34 Residents with Disabilities by Subsidized Housing Type City of Tuscaloosa HUD AFFH Raw Database						
Program	Total Units	Total Disabled Units				
Public Housing	895	143				
Project Based Section 8	770	212				
Other HUD Multifamily	24	13.0				
Housing Choice Vouchers 1,868 410						
Total	3,557	778				

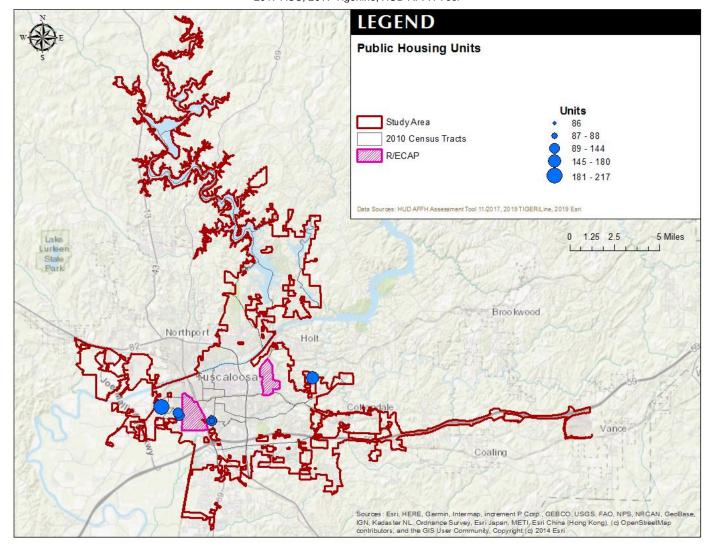
Map IV.15 shows public housing units in the City of Tuscaloosa. Map IV.16 shows housing choice vouchers. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.17 and Map IV.18 shows other assisted multi-family housing units in the City.

Disparities in Access to Opportunity

The locations of publicly supported housing units are in areas with both high and low access to opportunity. Publicly supported housing units did not tend to be associated with lower levels of access to opportunity overall or to be congregated in certain areas of the City or R/ECAPs.

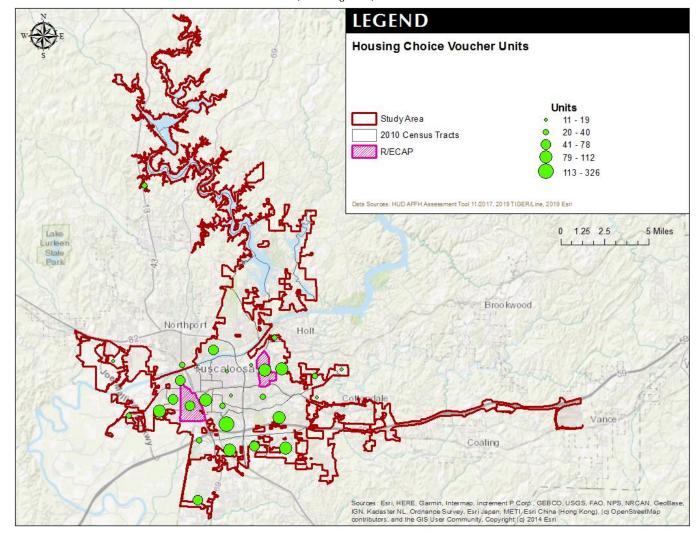
Map IV.15
Public Housing Units

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool

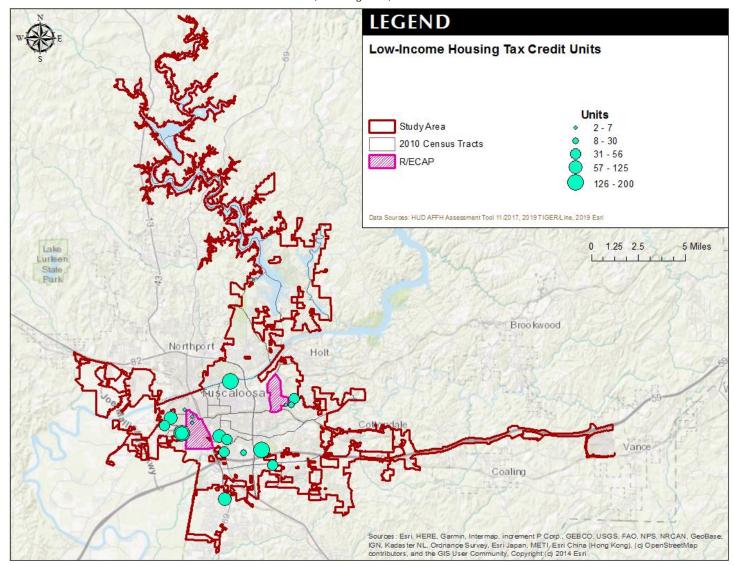


Map IV.16 Housing Choice Voucher Units

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool

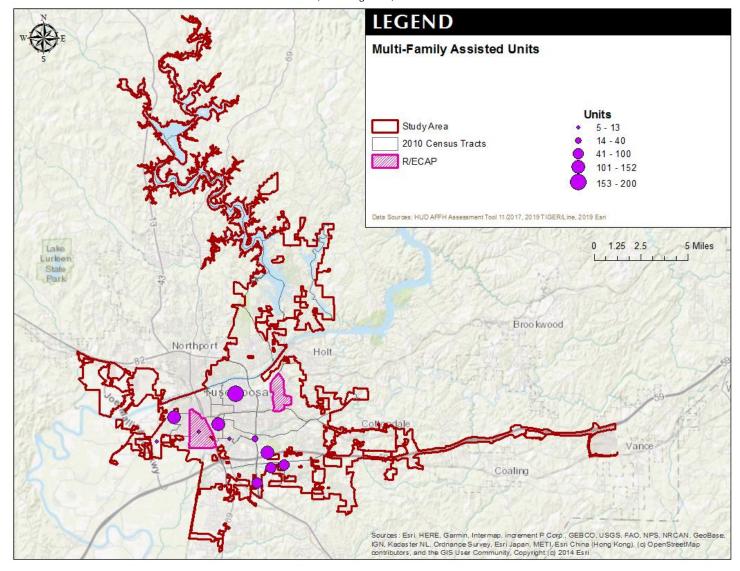


Map IV.17 Low Income Housing Tax Credit (LIHTC) Units
City of Tuscaloosa
2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.18 Other HUD Multi-Family Units

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool



G. DISABILITY AND ACCESS ANALYSIS

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.¹⁸ Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.¹⁹

Persons with Disabilities

Disability by age, as estimated by the 2017 ACS, is shown in Table IV.35. The disability rate for females was 11.3 percent, compared to 10.5 percent for males. The disability rate grew precipitously higher with age, with 50.9 percent of those over 75 experiencing a disability.

Table IV.35 Disability by Age City of Tuscaloosa 2017 Five-Year ACS Data							
	M	ale	Fe	male	Т	otal	
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate	
Under 5	0	0%	0	0%	0	0%	
5 to 17	240	3.7%	146	2.4%	386	3.1%	
18 to 34	1,207	6.5%	976	4.9%	2,183	5.7%	
35 to 64	1,889	14.1%	2,062	13.2%	3,951	13.6%	
65 to 74	615	21.5%	910	26.5%	1,525	24.2%	
75 or Older	845	50.4%	1,610	51.1%	2,455	50.9%	
Total	4,796	10.5%	5,704	11.3%	10,500	10.9%	

The number of disabilities by type, as estimated by the 2017 ACS, is shown in Table IV.36. Some 6.5 percent have an ambulatory disability, 5.2 percent have an independent living disability, and 2.5 percent have a self-care disability.

Table IV.36 Total Disabilities Tallied: Aged 5 and Older City of Tuscaloosa 2017 Five-Year ACS						
Disability Type	Population with Disability	Percent with Disability				
Hearing disability	2,197	2.3%				
Vision disability	1,963	2.0%				
Cognitive disability	4,468	4.9%				
Ambulatory disability	5,897	6.5%				
Self-Care disability	2,299	2.5%				
Independent living disability	4,050	5.2%				

Housing Accessibility

Accessible housing units are located throughout the City. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features. As the older population is growing at a faster rate than the overall population, the need for accessible units is expected to increase.

¹⁹ 42 U.S.C. §§ 121<u>31 – 12165</u>

^{18 29} U.S.C. §§794

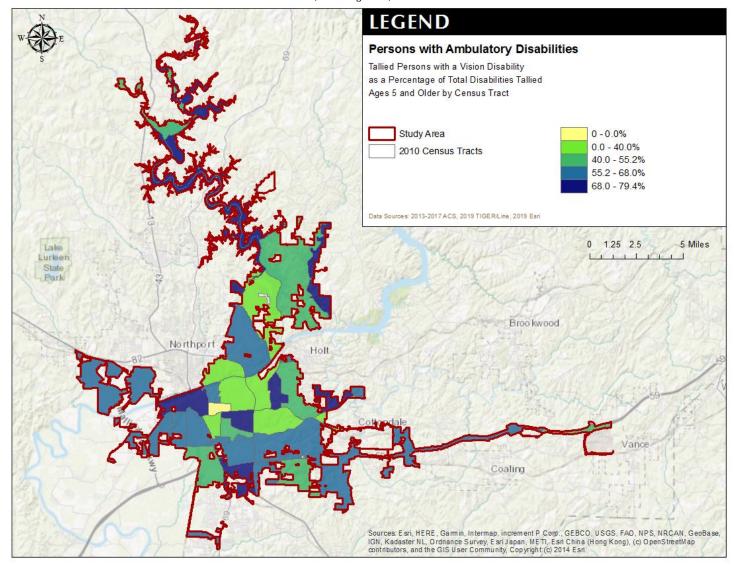
Some 21.9 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the City.

Table IV.37 Residents with Disabilities by Subsidized Housing Type City of Tuscaloosa HUD AFFH Raw Database						
Program	Total Units	Total Disabled Units				
Public Housing	895	143				
Project Based Section 8	770	212				
Other HUD Multifamily	24	13.0				
Housing Choice Vouchers 1,868 410						
Total	3,557	778				

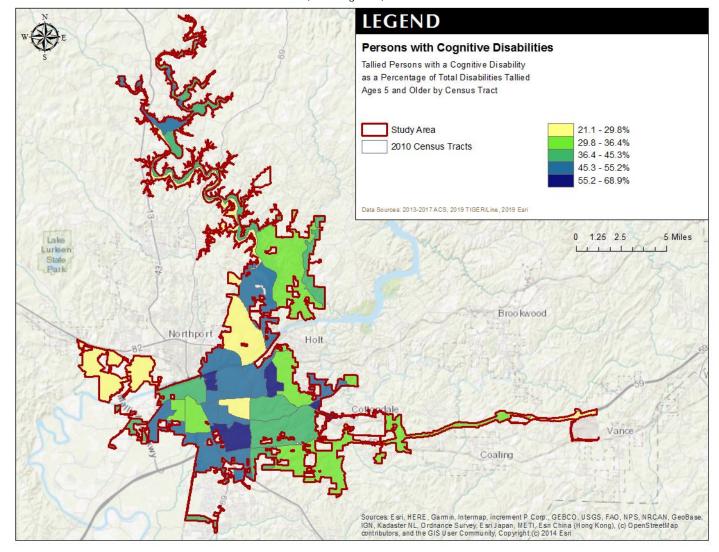
The maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the City.

Map IV.19
Persons with Ambulatory Disabilities

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool

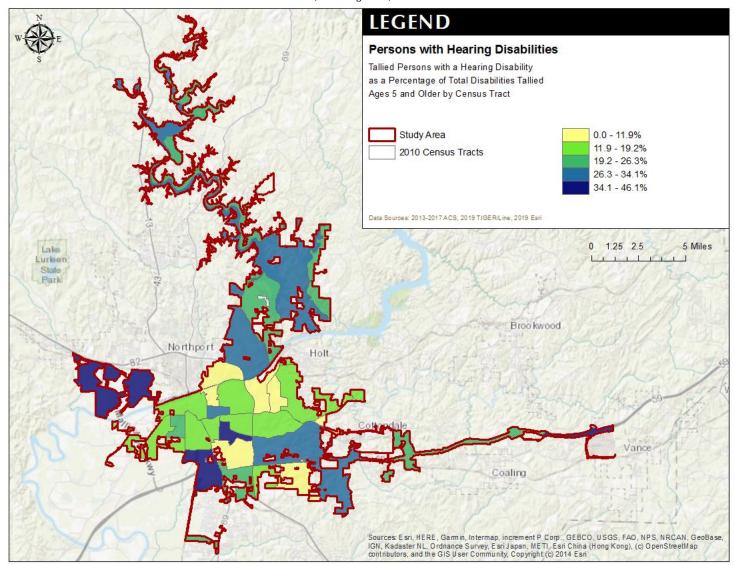


Map IV.20 Persons with Cognitive Disabilities
City of Tuscaloosa
2017 ACS, 2017 Tigerline, HUD AFFH Tool



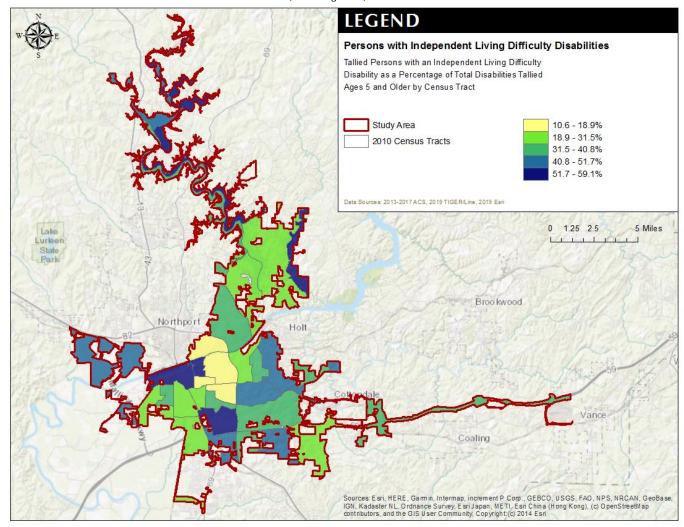
Map IV.21
Persons with Hearing Disabilities

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool



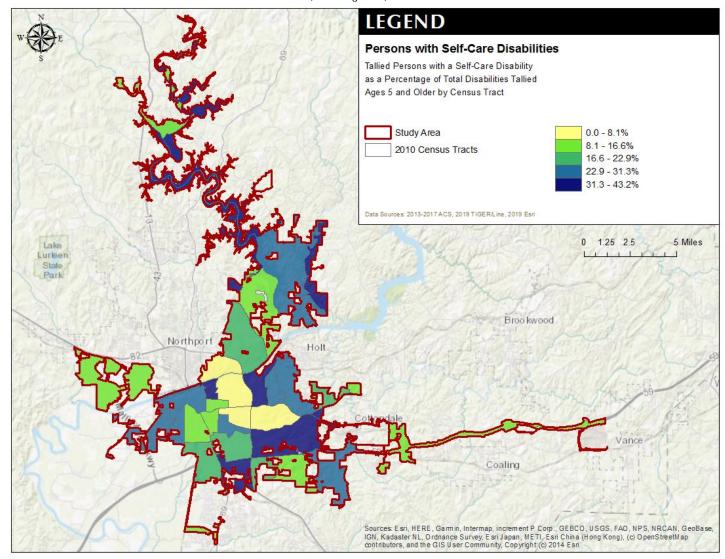
Map IV.22 Persons with Independent Living Disabilities

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool



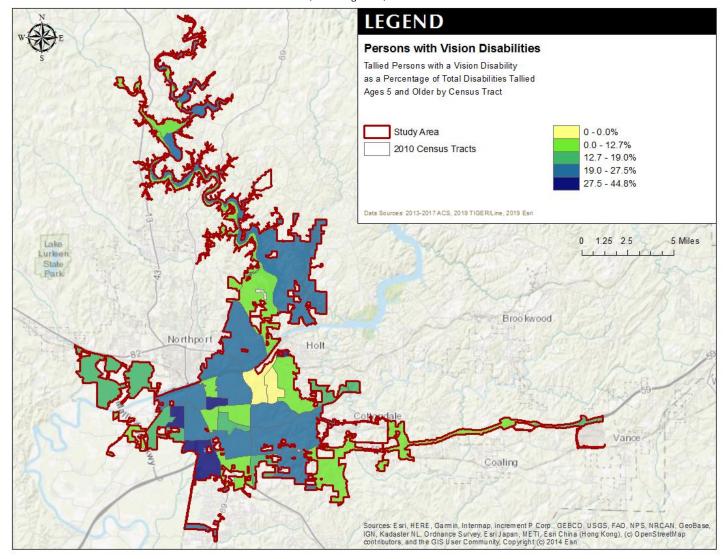
Map IV.23 Persons with Self Care Disabilities

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.24 Persons with Vision Disabilities

City of Tuscaloosa 2017 ACS, 2017 Tigerline, HUD AFFH Tool



H. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)²⁰

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.²¹ The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.²² On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/FHLaws VIII: Fair Housing

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/progdesc/title8

Equal Opportunity."

"Title

²⁰ 42 U.S.C. 3601, et. Seq., as amended in 1988

²¹ "HUD Fair Housing Laws and Presidential Executive Orders."

property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

- 2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
- 3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
- 4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
- 5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of "reasonable accommodations" and "reasonable modifications" was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements and are enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.²³

Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold²⁴
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

- 1. The institution must be a for-profit organization
- 2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million
- The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year

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²³ "HUD Fair Housing Laws and Presidential Executive Orders."

²⁴ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- 1. If they are HOEPA loans
- 2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
- 3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

STATE FAIR HOUSING LAWS

In addition to the federal laws described above, Alabama residents are protected from discrimination in the housing market by the Alabama Fair Housing Law (§24-8-1, et seq.). The protected classes recognized by Alabama law are the same as those recognized in the federal Fair Housing Act. There is no local fair housing ordinance in the City of Tuscaloosa.

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

Table IV.38, shows Fair Housing Complaints by basis for the period between 2008 to 2018. During this period, there were a total of 19 complaints. The most common complaint was on the basis of race, accounting for 9 complaints. This was following by disability, accounting for 7 complaints.

Table IV.38 Fair Housing Complaints by Basis City of Tuscaloosa HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Race	0	1	2	0	2	0	0	0	0	2	2	9
Disability	1	1	0	0	0	0	0	0	0	2	3	7
Retaliation	1	0	0	0	0	0	0	0	0	0	0	1
National Origin	0	0	0	0	1	0	0	0	0	0	0	1
Familial Status	0	0	0	0	0	0	0	0	1	0	0	1
Total Basis	2	2	2	0	3	0	0	0	1	4	5	19
Total Complaints	2	2	2	0	3	0	0	0	1	4	5	19

Table IV.39 shows Fair Housing complaints by closure during this time period. In four (4) of these complaints, there were no cause determination. In seven (7) of these complaints, there was successful settlement/conciliation.

	Table IV.39 Fair Housing Complaints by Closure City of Tuscaloosa HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total	
Conciliation/settle ment successful Complaint	0	0	0	0	1	0	0	0	1	2	3	7	
withdrawn by complainant after resolution	0	2	0	0	1	0	0	0	0	2	0	5	
No cause determination Complaint	1	0	1	0	0	0	0	0	0	0	2	4	
withdrawn by complainant without resolution	1	0	0	0	1	0	0	0	0	0	0	2	
Dismissed for lack of jurisdiction	0	0	1	0	0	0	0	0	0	0	0	1	
Total Closures	2	2	2	0	3	0	0	0	1	4	5	19	
Total Complaints	2	2	2	0	3	0	0	0	1	4	5	19	

HUD COMPLAINTS WITH CAUSE

Complaints with cause by basis is shown in Table IV.40. The most common complaint with cause was for disability and race, accounting for five (5) complaints each.

Table IV.40 Fair Housing Complaints with Cause by Basis City of Tuscaloosa HUD Fair Housing Complaints												
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Race	0	1	0	0	1	0	0	0	0	2	1	5
Disability	0	1	0	0	0	0	0	0	0	2	2	5
National Origin	0	0	0	0	1	0	0	0	0	0	0	1
Familial Status	0	0	0	0	0	0	0	0	1	0	0	1
Retaliation	0	0	0	0	0	0	0	0	0	0	0	0
Sex	0	0	0	0	0	0	0	0	0	0	0	0
Total Basis	0	2	0	0	2	0	0	0	1	4	3	12
Total Complaints	0	2	0	0	2	0	0	0	1	4	3	12

Table IV.41, shows Fair Housing complaints by issue. The most common issues, accounting for four (4) issues each, was discrimination in terms/conditions/privileges relating to rental and discriminatory terms, conditions, privileges, or services and facilities. This was followed by discriminatory refusal to rent and discriminatory refusal to rent and negotiate for rental.

Fair Housing complaints with cause by issue are shown in Table IV.42. The most issue with complaints with cause was discriminatory terms, conditions, privileges, or services and facilities, accounting for four (4) issues. This was followed by discriminatory refusal to rent, accounting for three (3) issues.

IV. Fair Housing Analysis

TableIV.41 Fair Housing Complaints by Issue City of Tuscaloosa HUD Fair Housing Complaints												
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Discrimination in terms/conditions/privileges relating to rental	1	0	1	0	0	0	0	0	0	0	2	4
Discriminatory terms, conditions, privileges, or services and facilities	0	0	0	0	0	0	0	0	0	1	3	4
Discriminatory refusal to rent	0	1	0	0	0	0	0	0	0	2	0	3
Discriminatory refusal to rent and negotiate for rental	0	0	0	0	2	0	0	0	0	1	0	3
Discriminatory acts under Section 818 (coercion, Etc.)	1	0	0	0	0	0	0	0	0	0	0	1
Failure to permit reasonable modification	0	1	0	0	0	0	0	0	0	0	0	1
Discriminatory financing (includes real estate transactions)	0	0	1	0	0	0	0	0	0	0	0	1
False denial or representation of availability - rental	0	0	0	0	1	0	0	0	0	0	0	1
Discriminatory advertising, statements and notices	0	0	0	0	0	0	0	0	1	0	0	1
Total Issues	2	2	2	0	3	0	0	0	1	4	5	19
Total Complaints	2	2	2	0	3	0	0	0	1	4	5	19

Table IV.42 Fair Housing Complaints with Cause by Issue City of Tuscaloosa HUD Fair Housing Complaints												
Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Discriminatory terms, conditions, privileges, or services and facilities	0	0	0	0	0	0	0	0	0	1	3	4
Discriminatory refusal to rent	0	1	0	0	0	0	0	0	0	2	0	3
Discriminatory refusal to rent and negotiate for rental	0	0	0	0	1	0	0	0	0	1	0	2
Failure to permit reasonable modification	0	1	0	0	0	0	0	0	0	0	0	1
False denial or representation of availability - rental	0	0	0	0	1	0	0	0	0	0	0	1
Discriminatory advertising, statements and notices	0	0	0	0	0	0	0	0	1	0	0	1
Total Issues	0	2	0	0	2	0	0	0	1	4	3	12
Total Complaints	0	2	0	0	2	0	0	0	1	4	3	12

I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 108 responses. Some 20 respondents are advocates, eight are from local government, and another eight are in real estate/brokerage.

Table IV.43 Role of Respondent City of Tuscaloosa 2019 Fair Housing Survey Data									
Primary Role	Total								
Advocate	20								
Appraisal	0								
Construction/Development	4								
Insurance	1								
Law/Legal Services	2								
Lending/Mortgage Industry	7								
Local Government	8								
Property Management	7								
Real Estate Sales/Brokerage	8								
Service Provider	4								
Other (please specify)	37								
Missing	10								
Total	108								

As seen in Table IV.44, most respondents are homeowners, accounting for 78 respondents.

Table IV.44 Which of the following describes your current housing situation? City of Tuscaloosa Fair Housing Survey							
Housing	Total						
Homeowner	78						
Renter	25						
Other	5						
Missing	0						
Total	108						

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar.

Table IV.45								
How familiar are you with Fair								
Housing Laws?								
City of Tuscaloosa								
2019 Fair Housing Survey Data								
Familiarity	Total							
Not Familiar	13							
Somewhat Familiar	25							
Very Familiar	19							
Missing	51							
Total	108							

Some 14 respondents feel that fair housing laws are adequately enforced, and 22 feel that fair housing laws should not be changed. Only 13 respondents were aware of outreach and education

opportunities in Tuscaloosa, and ten respondents have participated in a fair housing activity or training. Only seven respondents were aware of fair housing testing happening in Tuscaloosa.

Table IV.46 Fair Housing Activities City of Tuscaloosa 2019 Fair Housing Survey Data										
Question	Yes	No	Don't Know	Missing	Total					
Do you feel that fair housing laws are adequately enforced in the City of Tuscaloosa?	14	15	27	52	108					
Based on your knowledge of fair housing law, do you think that fair housing laws should be changed?	13	22	21	52	108					
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	13	38	2	55	108					
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	10	11	2	85	108					
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in Tuscaloosa?	7	34	12	55	108					

Of those who answered the question, most felt there was too little fair housing outreach and education in Tuscaloosa, while three respondents felt like there was too much.

Table IV.47 Please assess the level of fair housing outreach and education activity in Tuscaloosa. City of Tuscaloosa 2019 Fair Housing Survey Data						
Response	Total					
There is too much	3					
There is the right amount	7					
There is too little	19					
Don't Know	24					
Missing	55					

Respondents were most likely to be aware of impediments to fair housing choice in the private sector in the home appraisal industry, followed by the real estate industry. However, the majority of respondents were not aware of impediments in any of these areas.

	Table IV	.48			
Barriers to Fair H	lousing i	n the Pri	vate Sector		
	ity of Tusca				
	ir Housing S				
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair I	nousing ch	oice in the	se areas in the C	ity of Tuscalod	osa?
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	11	13	22	62	108
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	10	16	21	61	108
The rental housing market? (Example: Refusing to rent based on religion or color.)	8	16	24	60	108
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	7	16	24	61	108
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	6	14	28	60	108
Maintenance of foreclosed vacant properties by mortgage lenders? (Example: Mortgage lender does not maintain certain properties but maintains others that have successfully acquired a judgement of foreclosure.)	4	12	30	62	108
The home insurance industry? (Example: Limiting policies and coverages for racial minorities.)	3	13	30	62	108
Any other housing services?	3	14	27	64	108

In the public sector, respondents were most likely aware of impediments or barriers to fair housing choice in the quality of schools affecting where households choose to live, followed by land use policies.

Table IV.49 Barriers to Fair Housing in the Public Sector City of Tuscaloosa 2019 Fair Housing Survey Data												
Question	Yes	No	Don't know	Missing	Total							
Are you aware of any impediments or barriers	Are you aware of any impediments or barriers to fair housing choice in Tuscaloosa regarding:											
Does the quality of the local public school district affect the location of where households choose to live?	25	5	10	68	108							
Land use policies? (Example: Policies that concentrate multi- family housing in limited areas.)	10	10	18	70	108							
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	9	13	14	72	108							
Zoning laws? (Example: Laws that restrict placement of group homes.)	8	11	21	68	108							
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)	4	13	23	68	108							
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	4	15	21	68	108							
Are there any other public administrative actions or regulations in your community that act as barriers to fair housing choice?	4	8	27	69	108							
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	2	13	24	69	108							
The permitting process? (Example: Not offering written documents on procedures in alternate languages.) Housing construction standards? (Example: Lack of or	2	14	24	68	108							
confusing guidelines for construction of accessible housing.)	2	14	24	68	108							

Most respondents were not aware of any City fair housing ordinance, resolution, or plan, and most were not aware of any policies or practices to affirmatively further fair housing. Some 11 respondents felt there were specific geographic areas in Tuscaloosa that have fair housing problems.

Table IV.50 Fair Housing Activities City of Tuscaloosa 2019 Fair Housing Survey Data									
Question	Yes	No	Don't Know	Missing	Total				
Are you aware of any City fair housing ordinance, regulation, or plan in Tuscaloosa?	7	16	15	70	108				
Are you aware of any policies or practices for "affirmatively furthering fair housing" in Tuscaloosa?	5	17	16	70	108				
Are there specific geographic areas in Tuscaloosa that have fair housing problems?	11	5	22	70	108				

J. 2019 RENTAL VACANCY SURVEY

A Rental Vacancy Survey was conducted by Western Economic Services in December, 2019, to assess the availability and cost of rentals in Tuscaloosa. This survey was conducted via telephone and represents 11,104 units. The results of this survey are described in the following narrative.

The unit type by vacancy rate is shown in the table below. The overall vacancy rate for surveyed units was 6.38 percent. Two bedroom units had a vacancy rate of 5.75 percent, while one bedroom units had a vacancy rate 1.70 percent. Three bedroom units had a vacancy rate of 3.59 percent.

Table IV.51 2019 Unit Count and Vacancy Rate City of Tuscaloosa 2019 Rental Vacancy Survey									
Housing Unit Count 2019 Vacant Units Vacancy Rate									
Efficiency/studio	98	2	2.04%						
One Bedroom	1,701	29	1.70%						
Two Bedroom	3,584	206	5.75%						
Three Bedroom	1,225	44	3.59%						
Four Bedroom	592	5	0.84%						
Five or more Bedroom	79	0	0.00%						
Unit Type not Disclosed	3,825	422	11.03%						
Total	11,104	708	6.38%						

The following table shows the results of the 2015 Rental Vacancy Survey. The vacancy rate in 2015 was 4.0 percent. As with 2019, three bedroom units had the highest vacancy rate at 3.4 percent. One bedroom units had a 1.7 percent vacancy rate, while two bedroom units had a 2.9 percent vacancy rate.

Table IV.52 2015 Unit Count and Vacancy Rate City of Tuscaloosa 2015 Rental Vacancy Survey Unit Count										
Housing	Vacancy Rate									
Efficiency/studio	235	2	0.9%							
One Bedroom	2,367	40	1.7%							
Two Bedroom	4,306	125	2.9%							
Three Bedroom	1,041	35	3.4%							
Four Bedroom	541	1	0.2%							
Five or more Bedroom	55	0	0.0%							
Unit Type not Disclosed	7,715	446	5.8%							
Total	16,260	649	4.0%							

In the 2019 survey, the weighted average rent was \$1,080. In 2017, the average rent was \$1,002, representing a 7.8 percent increase between 2017 and 2019. The average rent for an efficiency bedroom in 2019 was \$863, and \$749 for a one bedroom. The average rent for a two bedroom was \$936 in 2019, and \$1,331 for a three bedroom.

Table IV.53 2019 Average Market Rate Rents City of Tuscaloosa 2019 Rental Vacancy Survey									
	1	Weighted Average							
Housing	2017 Market Rate Rent (\$)	2018 Market Rate Rent (\$)	2019 Market Rate Rent (\$)						
Efficiency/studio	\$803	\$873	\$863						
One Bedroom	\$685	\$707	\$749						
Two Bedroom	\$885	\$903	\$936						
Three Bedroom	\$1,258	\$1,274	\$1,331						
Four Bedroom	\$1,848	\$1,889	\$1,940						
Five or more Bedroom	\$3,094	\$3,162	\$3,361						
Unit Type not Disclosed		\$880	\$1,108						
Total	\$1,002	\$1,023	\$1,080						

In 2015, the average rental price was \$950. Between 2015 and 2019, the City saw a 13.7 percent increase in the overall average rent. Four and Five or more bedroom units saw the highest increase between 2015 and 2019, more than doubling in price. Rents for efficiency units and three bedroom units increased by close to 29 percent, each. These increases are illustrated in Diagram IV.10, on the following page.

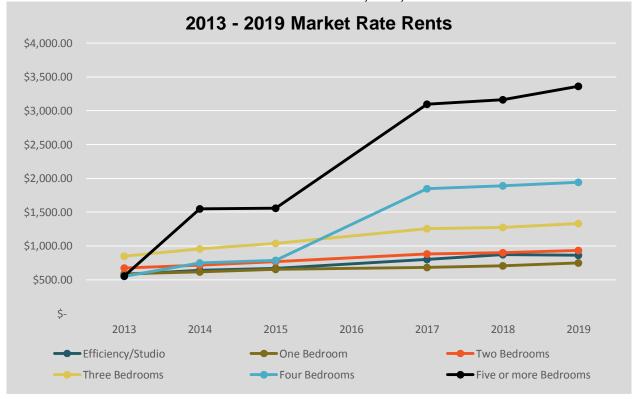
Table IV.54 2015 Average Market Rate Rents City of Tuscaloosa 2015 Rental Vacancy Survey									
	1	Neighted Average	•						
Housing	2013 Market Rate Rent (\$)	2014 Market Rate Rent (\$)	2015 Market Rate Rent (\$)						
Efficiency/studio	\$580	\$639	\$669						
One Bedroom	\$591	\$618	\$654						
Two Bedroom	\$672	\$715	\$769						
Three Bedroom	\$849	\$958	\$1,037						
Four Bedroom	\$553	\$749	\$789						
Five or more Bedroom	\$555	\$1,550	\$1,560						
Total	\$738	\$950	\$950						

When looking at units that receive some sort of rental assistance, a total of 959 units were surveyed. The vacancy rate for assisted units was 0.83 percent. The average rent for assisted units was \$510 units.

Table IV.55 2019 Assisted Unit Count City of Tuscaloosa 2019 Rental Vacancy Survey										
Housing	Assisted Units	Assisted Vacancy Rate	Assisted Rate (Weighted Average)							
Efficiency/studio	0									
One Bedroom	182	0.55%	\$391							
Two Bedroom	142	2.82%	\$647							
Three Bedroom	12	25.00%	\$705							
Four Bedroom	0		\$452							
Five or more Bedroom	0									
Unit Type not Disclosed	623									
Total	959	0.83%	\$510							

Diagram IV.10 Market Rate Rentals

City of Tuscaloosa 2015 & 2019 Rental Vacancy Survey



K. MUNICIPAL CODE REVIEW

A review of the City of Tuscaloosa's Municipal Code was conducted in order to review if there are any barriers in the City's regulations that may impede access to housing. The following narrative is a description of any language or statutes that may act a barrier to fair housing choice.

This review gauged zoning and code regulations that may encourage or limit fair housing choice within the City. The Municipal Code was review for definitions of dwelling unit, disability, and family. The use of the word family, including a strict definition of family, or limiting the number of people in "family," may limit housing choices within a jurisdiction. The review included the allowance of mixed-use and conditional uses, which may increase opportunities for the development of more affordable housing choices. The review also asked about any policies that encourage the development of affordable housing, as well as any policies that promote fair housing within their communities. The review also sought to ascertain any restrictions to group housing and housing for seniors, including definitions and where these units may be permitted.

The City does have a definition of the word "Family," which is included here:

"Family" Family: In addition to the ordinary meaning of the word, an individual person, a married couple, or a group of persons living together as one household.

The City's code did not have a definition for the term "disability." There was no mention of how an individual could request a reasonable accommodation for housing on the City's website. There were no apparent regulations in the City's Code to encourage the development of affordable housing, or for inclusionary housing. Group homes are permitted in mixed use areas.

The City's website did not include any easily accessible information about where to turn to help regarding fair housing issues or housing discrimination.

Section V. Fair Housing Goals and Priorities

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

- 1. The Fair Housing Act,
- 2. The Housing Amendments Act, and
- 3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)²⁵, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

²⁵ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Tuscaloosa certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the City of Tuscaloosa has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1 provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

- 1. High: Factors that have a direct and substantial impact on fair housing choice
- 2. Medium: Factors that have a less direct impact on fair housing choice, or that the City of Tuscaloosa has limited authority to mandate change.
- 3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the City of Tuscaloosa has limited capacity to address.

ADDITIONAL FINDINGS

In addition to the table on the following page are several significant findings or conclusions summarized here. The City had two Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in 2017.

A review of the City's Municipal Code found that there are no city policies to encourage the development of affordable housing or inclusionary policies. The City's definition of "family" did not appear to limit access to housing options in the City.

The City uses CDBG and HOME funds annually to increase access to various opportunities, as well as increase the supply of an access to affordable housing in Tuscaloosa. Some of the recommendations on the following page are to continue these efforts.

Public input and stakeholder finding indicated the need for a review of the City's zoning to allow for the development of higher density units in more areas of the City. The survey and public input indicated a need for more fair housing outreach and education.

	Table V.1 Contributing Factors City of Tuscaloosa									
Contributing Factors	Priority	Justification								
Discriminatory patterns in lending	High	As demonstrated by 2008-2017 HMDA data, black and Hispanic households have a higher mortgage denial rate than white households. The average denial rate over the entire period was 6.8 percent for white households; however, the denial rate was 21.3 percent for black households, and 14.3 percent for Hispanic households.								
Access to low poverty areas	Med	Low poverty index is markedly lower for black and Hispanic populations than white school proficiency, indicating inequitable access to low poverty areas. However, the City of Tuscaloosa has little control over increasing access.								
Access to proficient schools	Med	The level of access to proficient schools is lower for black and Hispanic households than for other racial or ethnic groups in the City. However, the City has little control over this on a large scale.								
Access to labor market engagement	Med	Black households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the City has little control over impacting labor market engagement on a large scale.								
Moderate to high levels of segregation	High	Black and Hispanic households have high levels of segregation in Tuscaloosa, according to the Dissimilarity Index. American Indian, Native Hawaiian, and "other" racial households have moderate to high levels of segregation. However, these households represent less than one percent of the overall population in Tuscaloosa.								
Insufficient affordable housing in a range of unit sizes	High	Some 37.6 percent of households have cost burdens. This is more significant for renter households, of which 50.0 percent of renter households have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.								
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 50.9 percent of persons aged 75 and older have at least one form of disability.								
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.								
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.								
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.								

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND RECOMMENDED ACTIONS

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

	Table \				
Recommende	d Fair Housing Issues, Contribut City of Tusca	ting Factors, and Recommended Actions			
Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken			
Segregation	Moderate to high levels of segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years.			
Disparities in Access to Opportunity	Access to low poverty areas	Review opportunities annually to increase funding sources for additional low-income housing in high opportunity areas. Continue to use CDBG funds to provide transportation services to low income and elderly households; review need for transportation annually.			
	Access to proficient schools Access to labor market engagement	Continue to promote homeownership opportunities in high opportunity areas with financial assistance to homebuyers using HOME funds: 40 households over five (5) years.			
	Labor market engagement	Explore opportunities annually for redevelopment or rehabilitation of residential properties in high opportunity areas Continue to use CDBG funds to rehabilitate housing units in high opportunity areas: 30 households over five (5) years.			
Disproportionate Housing Need	Insufficient affordable housing in a range of unit sizes	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years.			
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	Moderate to high levels of segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years. Review opportunities annually to increase funding sources for			
Publicly Supported Housing	Insufficient affordable housing in a range of unit sizes	Locate any future publicly supported housing units in high opportunity areas. Locate any future publicly supported housing units in high opportunity areas. Review the location of publicly supported housing units annually.			
Disability and Access	Insufficient accessible affordable housing	Research opportunities for increased funding options annually. Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years.			
	Insufficient fair housing education	Promote fair housing education through annual or biannual workshops. Promote annual outreach and education related to credit for			
Fair Housing Enforcement and Outreach	Insufficient understanding of credit Insufficient fair housing infrastructure	prospective homebuyers. Partner with agency to provide financial literacy classes for			
	Discriminatory patterns in lending	prospective homebuyers on an annual basis. Add fair housing information to the City's website, review information annually.			

Section VI. Appendices

A. ADDITIONAL PLAN DATA

					Tal	ole VI.1						
	L	oan Appl	lications	by Selec	cted Acti	on Taker	n by Rac	e/Ethnici	ity of Ap	plicant		
						Tuscaloos						
						17 HMDA [20.45	
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
American	Originated	1	0	1	2	1	0	2	1	2	2	12
Indian	Denied	2	0	0	0	0	0	0	0	1	1	4
	Denial Rate	66.7%	%	0.0%	0.0%	0.0%	%	0.0%	0.0%	33.3%	33.3%	25.0%
	Originated	10	9	10	8	9	21	7	15	18	15	122
Asian	Denied	3	1	0	0	2	1	1	0	1	1	10
	Denial Rate	23.1%	10.0%	0.0%	0.0%	18.2%	4.5%	12.5%	0.0%	5.3%	6.2%	7.6%
	Originated	153	106	114	112	102	97	133	147	191	197	1352
Black	Denied	26	16	33	31	34	56	48	42	45	36	367
	Denial Rate	14.5%	13.1%	22.4%	21.7%	25.0%	36.6%	26.5%	22.2%	19.1%	15.5%	21.3%
D:'0' -	Originated	1	1	1	0	0	0	2	1	2	0	8
Pacific Islander	Denied	0	0	0	0	0	1	0	0	0	1	2
isiariuei	Denial Rate	0.0%	0.0%	0.0%	%	%	100.0%	0.0%	0.0%	0.0%	100.0%	20.0%
	Originated	380	362	359	397	406	447	442	471	502	580	4346
White	Denied	30	19	28	22	33	35	26	41	50	34	318
	Denial Rate	7.3%	5.0%	7.2%	5.3%	7.5%	7.3%	8.3%	8.0%	9.1%	5.5%	6.8%
	Originated	29	32	25	16	17	26	11	14	30	30	230
Not	Denied	16	11	9	3	4	6	1	5	9	5	69
Available	Denial Rate	35.6%	25.6%	26.5%	15.8%	19.0%	18.8%	8.3%	26.3%	23.1%	14.3%	23.1%
	Originated	0	0	0	1	0	0	0	0	2	4	7
Not	Denied	0	0	0	1	0	0	0	0	0	0	1
Applicable	Denial Rate	%	%	%	50.0%	%	%	%	%	0.0%	0.0%	12.5%
	Originated	574	510	510	536	535	591	597	649	747	828	6,077
Total	Denied	77	47	70	57	73	99	76	88	106	78	771
	Denial Rate	11.8%	8.4%	12.1%	9.6%	12.0%	14.3%	11.3%	11.9%	12.4%	8.6%	11.3%
	Originated	10	2	9	7	3	9	13	16	14	13	96
Hispanic	Denied	1	1	4	0	1	3	1	1	4	0	16
	Denial Rate	9.1%	33.3%	30.8%	0.0%	25.0%	25.0%	7.1%	5.9%	22.2%	0.0%	14.3%
Non-	Originated	533	477	477	515	512	554	574	615	699	773	5729
Hispani	Denied	59	36	60	54	68	88	73	82	91	69	680
С	Denial Rate	10.0%	7.0%	11.2%	9.5%	11.7%	13.7%	11.3%	11.8%	11.5%	8.2%	10.6%

Table VI.2 Loan Applications by Reason for Denial by Race/Ethnicity of Applicant City of Tuscaloosa 2008–2017 HMDA Data										
Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)	
Debt-to-Income Ratio	0	6	72	1	55	9	0	143	0	
Employment History	0	0	7	0	9	3	0	19	0	
Credit History	0	0	93	1	71	19	0	184	0	
Collateral	1	0	27	0	37	2	0	67	1	
Insufficient Cash	0	0	10	0	9	0	0	19	0	
Unverifiable Information	0	1	7	0	15	2	0	25	0	
Credit Application Incomplete	1	1	10	0	21	5	0	38	1	
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0	
Other	0	0	19	0	22	8	0	49	0	
Missing	2	2	122	0	79	21	1	227	14	
Total	4	10	367	2	318	69	1	771	16	
% Missing	50.0%	20.0%	33.2%	0.0%	24.8%	30.4%	100.0%	29.4%	87.5%	

					Ta	ble VI.3	3					
		Loan	Applicat	ions by S	Selected	Action T	aken by	Gender	of Applic	ant		
	City of Tuscaloosa											
	2008–2017 HMDA Data											
Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
	Originated	373	333	330	346	362	392	406	465	464	520	3991
Male	Denied	34	24	35	33	39	63	34	47	54	45	408
	Denial Rate	8.4%	6.7%	9.6%	8.7%	9.7%	13.8%	7.7%	9.2%	10.4%	8.0%	9.3%
	Originated	188	162	169	177	165	180	186	180	262	283	1952
Female	Denied	30	16	30	20	31	31	41	40	43	27	309
	Denial Rate	13.8%	9.0%	15.1%	10.2%	15.8%	14.7%	18.1%	18.2%	14.1%	8.7%	13.7%
Niet	Originated	13	15	11	12	8	19	5	4	19	21	127
Not Available	Denied	13	7	5	3	3	5	1	1	9	6	53
Available	Denial Rate	50.0%	31.8%	31.2%	20.0%	27.3%	20.8%	16.7%	20.0%	32.1%	22.2%	29.4%
Not	Originated	0	0	0	1	0	0	0	0	2	4	7
Not Applicable	Denied	0	0	0	1	0	0	0	0	0	0	1
пррпоавіс	Denial Rate	%	%	%	50.0%	%	%	%	%	0.0%	0.0%	12.5%
	Originated	574	510	510	536	535	591	597	649	747	828	6,077
Total	Denied	77	47	70	57	73	99	76	88	106	78	771
	Denial Rate	11.8%	8.4%	12.1%	9.6%	12.0%	14.3%	11.3%	11.9%	12.4%	8.6%	11.3%

Table VI.4 Denial Rates by Income of Applicant City of Tuscaloosa 2008–2017 HMDA Data											
Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000 or Below	24.1%	14.0%	26.6%	19.0%	24.7%	36.6%	35.4%	22.1%	38.4%	16.5%	25.2%
\$30,001-\$50,000	13.8%	9.7%	9.4%	11.8%	14.0%	16.6%	16.1%	16.0%	15.8%	11.8%	13.5%
\$50,001-\$75,000	10.0%	8.5%	15.5%	10.5%	14.4%	14.9%	8.6%	10.5%	7.1%	7.7%	10.5%
\$75,001-\$100,000	8.2%	3.5%	5.5%	5.1%	7.8%	10.9%	6.8%	10.0%	5.6%	5.0%	7.0%
\$100,001-\$150,000	9.0%	4.1%	8.8%	2.4%	5.7%	5.1%	2.6%	8.8%	8.9%	5.7%	6.1%
Above \$150,000	3.9%	6.0%	3.0%	3.8%	2.6%	3.2%	2.3%	5.0%	6.0%	5.1%	4.2%
Data Missing	0.0%	0.0%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	%	0.0%
Total	11.8%	8.4%	12.1%	9.6%	12.0%	14.3%	11.3%	11.9%	12.4%	8.6%	11.3%

		Loan Ap _l	plication		Table ome of A City of Tus 008–2017 H	pplicant caloosa	: Origina	ited and	Denied			
Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
\$30,000	Loan Originated	66	80	69	85	64	52	42	67	53	71	649
or Below	Application Denied	21	13	25	20	21	30	23	19	33	14	219
0. 20.011	Denial Rate	24.1%	14.0%	26.6%	19.0%	24.7%	36.6%	35.4%	22.1%	38.4%	16.5%	25.2%
¢20.004	Loan Originated	150	159	173	120	123	141	161	137	187	216	1567
\$30,001 -\$50,000	Application Denied	24	17	18	16	20	28	31	26	35	29	244
ψου,σου	Denial Rate	13.8%	9.7%	9.4%	11.8%	14.0%	16.6%	16.1%	16.0%	15.8%	11.8%	13.5%
\$50.001	Loan Originated	135	97	87	102	107	131	128	153	182	167	1289
-\$75.000	Application Denied	15	9	16	12	18	23	12	18	14	14	151
-ψ13,000	Denial Rate	10.0%	8.5%	15.5%	10.5%	14.4%	14.9%	8.6%	10.5%	7.1%	7.7%	10.5%
\$75,001	Loan Originated	78	55	52	74	83	82	68	81	101	113	787
- 0400	Application Denied	7	2	3	4	7	10	5	9	6	6	59
\$100, 000	Denial Rate	8.2%	3.5%	5.5%	5.1%	7.8%	10.9%	6.8%	10.0%	5.6%	5.0%	7.0%
# 400 004	Loan Originated	71	71	62	80	82	94	113	114	113	132	932
\$100,001 -150,000	Application Denied	7	3	6	2	5	5	3	11	11	8	61
-130,000	Denial Rate	9.0%	4.1%	8.8%	2.4%	5.7%	5.1%	2.6%	8.8%	8.9%	5.7%	6.1%
	Loan Originated	73	47	65	75	74	90	85	96	110	129	844
Above \$150,000	Application Denied	3	3	2	3	2	3	2	5	7	7	37
\$130,000	Denial Rate	3.9%	6.0%	3.0%	3.8%	2.6%	3.2%	2.3%	5.0%	6.0%	5.1%	4.2%
Data	Loan Originated	1	1	2	0	2	1	0	1	1	0	9
Data Missing	Application Denied	0	0	0	0	0	0	0	0	0	0	0
wildoning	Denial Rate	0.0%	0.0%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	%	0.0%
	Loan Originated	574	510	510	536	535	591	597	649	747	828	6,077
Total	Application Denied	77	47	70	57	73	99	76	88	106	78	771
	Denial Rate	11.8%	8.4%	12.1%	9.6%	12.0%	14.3%	11.3%	11.9%	12.4%	8.6%	11.3%

	Table VI.6 Denial Rates of Loans by Race/Ethnicity and Income of Applicant City of Tuscaloosa 2008–2017 HMDA Data													
Race	or Below - \$50,000 -\$75,000 -\$100,000 -\$150,000 Missing													
American Indian	66.7%	33.3%	25.0%	0.0%	0.0%	%	0.0%	25.0%						
Asian	25.0%	5.9%	10.7%	0.0%	6.9%	4.0%	%	7.6%						
Black	31.1%	18.2%	20.0%	18.4%	9.5%	4.3%	0.0%	21.3%						
Pacific Islander	%	20.0%	33.3%	0.0%	0.0%	%	%	20.0%						
White	16.5%	8.7%	6.1%	4.9%	5.3%	4.2%	0.0%	6.8%						
Not Available	40.5%	29.3%	21.2%	16.3%	20.0%	5.0%	%	23.1%						
Not Applicable	14.3%	%	%	%	%	0.0%	%	12.5%						
Average	25.2%	13.5	10.5%	7.0%	6.1%	4.2%	0.0%	11.3%						
Non-Hispanic	33.3%	20.0	3.8%	0.0%	9.1%	8.3%	%	14.3%						
Hispanic	24.2%	12.7	10.0%	6.6%	5.6%	3.8%	0.0%	10.6%						

			T	able VI.7	'				
	Loan Application	ns by Incon				nt: Originat	ed and Deni	ied	
	• • • • • • • • • • • • • • • • • • • •		City	y of Tuscaloos	sa ·	- J			
				-2017 HMDA I					
Race		\$30,000 or Below	\$30,001 - \$50,000	\$50,001 – \$75,000	\$75,001 - \$100,000	\$100,001 - \$150,000	> \$150,000	Data Missing	Total
	Loan Originated	1	2	3	2	3	0	1	12
American Indian	Application Denied	2	1	1	0	0	0	0	4
	Denial Rate	66.7%	33.3%	25.0%	0.0%	0.0%	%	0.0%	25.0%
	Loan Originated	9	16	25	21	27	24	0	122
Asian	Application Denied	3	1	3	0	2	1	0	10
	Denial Rate	25.0%	5.9%	10.7%	0.0%	6.9%	4.05	%	7.6%
	Loan Originated	299	588	300	84	57	22	2	1352
Black	Application Denied	135	131	75	19	6	1	0	367
	Denial Rate	31.1%	18.2%	20.0%	18.4%	9.5%	4.3%	0.0%	20.0%
	Loan Originated	0	4	2	1	1	0	0	8
Pacific Islander	Application Denied	0	1	1	0	0	0	0	2
	Denial Rate	%	20.0%	33.3%	0.0%	0.0%	%	%	20.0%
	Loan Originated	309	899	918	643	812	759	6	4346
White	Application Denied	61	86	60	33	45	33	0	318
	Denial Rate	16.5%	8.7%	6.1%	4.9%	5.3%	4.2%	0.0%	6.8%
	Loan Originated	25	58	41	36	32	38	0	230
Not Available	Application Denied	17	24	11	7	8	2	0	69
	Denial Rate	40.5%	29.3%	21.2%	16.3%	20.0%	5.0%	%	23.1%
	Loan Originated	6	0	0	0	0	1	0	7
Not Applicable	Application Denied	1	0	0	0	0	0	0	1
	Denial Rate	14.3%	%	%	%	%	0.0%	%	12.5%
	Loan Originated	649	1567	1289	787	932	844	9	6,077
Total	Application Denied	219	244	151	59	61	37	0	771
	Denial Rate	25.2%	13.5%	10.5%	7.0%	6.1%	4.2%	0.0	11.3%
	Loan Originated	12	28	25	10	10	11	0	96
Hispanic	Application Denied	6	7	1	0	1	1	0	16
·	Denial Rate	33.3%	20.0%	3.8%	0.0%	9.1%	8.3%	%	14.3%
	Loan Originated	606	1471	1227	734	890	792	9	5729
Non-Hispanic	Application Denied	194	214	136	52	53	31	0	680
	Denial Rate	24.2%	12.7%	10.0%	6.6%	5.6%	3.8%	0.0%	10.6%

	Table VI.8 Loans by Loan Purpose by HAL Status City of Tuscaloosa 2008–2017 HMDA Data												
Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total	
Llomo	HAL	35	17	2	6	6	0	0	3	0	0	69	
Home	Other	539	493	508	530	529	591	597	646	747	828	6008	
Purchase	Percent HAL	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%	
Hama	HAL	12	6	3	2	1	1	4	1	1	2	33	
Home	Other	59	31	39	22	37	53	46	43	63	47	440	
Improvement	Percent HAL	16.9%	16.2%	7.1%	8.3%	2.6%	1.9%	8.0%	2.3%	1.6%	4.1%	1.1%	
	HAL	108	47	3	7	13	3	3	0	3	4	191	
Refinancing	Other	511	1030	857	602	1094	792	373	465	501	345	6570	
	Percent HAL	17.4%	4.4%	0.3%	1.1%	1.2%	0.4%	0.8%	0.0%	0.6%	1.1%	1.1%	
	HAL	155	70	8	15	20	4	7	4	4	6	293	
Total	Other	1109	1554	1404	1154	1660	1436	1016	1154	1311	1220	13018	
·····	Percent HAL	12.3%	4.3%	0.6%	1.3%	1.2%	0.3%	0.7%	0.3%	0.3%	0.5%	2.2%	

	Table VI.9 HALs Originated by Race of Borrower City of Tuscaloosa 2008–2017 HMDA Data													
Race 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Total														
American Indian 0 0 0 0 0 nan nan 0 nan nan 0														
Asian	1	0	0	0	0	nan	nan	0	nan	nan	1			
Black	18	4	0	4	6	nan	nan	0	nan	nan	32			
Pacific Islander	0	0	0	0	0	nan	nan	0	nan	nan	0			
White	15	12	2	2	0	nan	nan	3	nan	nan	34			
Not Available	1	1	0	0	0	nan	nan	0	nan	nan	2			
Not Applicable	0	0	0	0	0	nan	nan	0	nan	nan	0			
Total	35	17	2	6	6	0	0	3	0	0	69			
Hispanic	0	1	0	0	0	nan	nan	0	nan	nan	82			
Non-Hispanic	33	15	2	6	6	nan	nan	3	nan	nan	4,891			

	Table VI.10 Rate of HALs Originated by Race/Ethnicity of Borrower City of Tuscaloosa 2008–2017 HMDA Data													
Race 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Average														
American Indian	0.0%	%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	0.0%			
Asian	10.0%	0.0%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	0.9%			
Black	11.8%	3.8%	0.0%	3.6%	5.9%	%	%	0.0%	%	%	2.8%			
Pacific Islander	0.0%	0.0%	0.0%	%	%	%	%	0.0%	%	%	0.0%			
White	3.9%	3.3%	0.6%	0.5%	0.0%	%	%	0.6%	%	%	0.9%			
Not Available	3.4%	3.1%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.0%			
Not Applicable	%	%	%	0.0%	%	%	%	%	%	%	0.0%			
Average	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%			
Hispanic	0.0%	50.0%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.2%			
Non-Hispanic	6.2%	3.1%	0.4%	1.2%	1.2%	%	%	0.5%	%	%	1.3%			

			Loans b	y HAL S	tatus by		hnicity o	f Borrow	er			
						Tuscaloosa						
Race	Loan Type	2008	2009	2010	2008–201 2011	7 HMDA D: 2012	ata 2013	2014	2015	2016	2017	Total
Nace	HAL	0	0	0	0	0	nan	nan	0	nan	nan	0
American	Other	1	0	1	2	1	0	2	1	2	2	10
Indian	Percent HAL	0.0%	%	0.0%	0.0%	0.0%	%	2 %	0.0%	%	<u>~</u> %	0.0%
	HAL	1	0	0.078	0.078	0.078	nan	nan	0.078	nan	nan	1
Asian	Other	9	9	10	8	9	21	7	15	18	15	106
Asian	Percent HAL	10.0%	0.0%	0.0%	0.0%	0.0%	%	<i>'</i>	0.0%		%	0.9%
	HAL	18	4	0.070	4	6	nan	nan	0.070	nan	nan	32
Black	Other	135	102	114	108	96	97	133	147	191	197	1,123
Diack	Percent HAL	11.8%	3.8%	0.0%	3.6%	5.9%	%	%	0.0%	%	%	2.8%
Pacific	HAL	0	0	0.070	0	0	nan	nan	0.070	nan	nan	0
Islande	Other	1	1	1	0	0	0	2	1	2	0	8
r	Percent HAL	0.0%	0.0%	0.0%	%	%	%	<u>2</u>	0.0%	%	%	0.0%
	HAL	15	12	2	2	0	nan	nan	3	nan	nan	34
White	Other	365	350	357	395	406	447	442	468	502	580	3,732
***************************************	Percent HAL	3.9%	3.3%	0.6%	0.5%	0.0%	%	%	0.6%	%	%	0.9%
	HAL	1	1	0	0	0	nan	nan	0	nan	nan	2
Not	Other	28	31	25	16	17	26	11	14	30	30	1,123
Available	Percent HAL	3.4%	3.1%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.0%
	HAL	0	0	0	0	0	nan	nan	0	nan	nan	0
Not	Other	0	0	0	1	0	0	0	0	2	4	3
Applicable	Percent HAL	%	%	%	0.0%	%	%	%	%	%	%	0.0%
	HAL	35	17	2	6	6	0	0	3	0	0	69
Total	Other	539	493	508	530	529	591	597	646	747	828	6008
	Percent HAL	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%
	HAL	0.170	1	0.470	0	0	nan	nan	0.5 /0	nan	nan	82
Hispanic	Other	10	1	9	7	3	9	13	16	14	13	1
riispariic		0.0%	50.0%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.2%
	Percent HAL HAL	33	15	2	6	6			3			
Non-	Other		462	∠ 475			nan 554	nan 574		nan	nan	4,891
Hispanic		500			509	506	554	574	612	699	773	65
	Percent HAL	6.2%	3.1%	0.4%	1.2%	1.2%	%	%	0.5%	%	%	1.3%

Table VI.12 Rates of HALs by Income of Borrower City of Tuscaloosa 2008–2017 HMDA Data												
Income 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 Average												
\$30,000 or Below 6.1% 6.2% 0.0% 5.9% 7.8% % % 0.0% % % 3.3%												
\$30,001-\$50,000	6.0%	3.1%	0.0%	0.0%	0.8%	%	%	0.7%	%	%	1.2%	
\$50,001-\$75,000	3.0%	2.1%	2.3%	1.0%	0.0%	%	%	0.0%	%	%	0.8%	
\$75,001-\$100,000	6.4%	0.0%	0.0%	0.0%	0.0%	%	%	1.2%	%	%	0.9%	
\$100,00-150,000	5.6%	1.4%	0.0%	0.0%	0.0%	%	%	0.9%	%	%	0.8%	
Above \$150,000	11.0%	8.5%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.7%	
Data Missing 100.0% 0.0% 0.0% % 0.0% % 0.0% % 11.1%												
Average	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%	

			Loa	ans by H		ole VI.13		Sorrower				
					City of	f Tuscaloos 16 HMDA [а					
Income		2008	2009	2010	2008–20 2011	2012	2013	2014	2015	2016	2017	Total
# 00.000	HAL	4	5	0	5	5	nan	nan	0	nan	nan	19
\$30,000 or Below	Other	62	75	69	80	59	52	42	67	53	71	559
or pelow	Percent HAL	6.1%	6.2%	0.0%	5.9%	7.8%	%	%	0.0%	%	%	3.3%
#00.004	HAL	9	5	0	0	1	nan	nan	1	nan	nan	16
\$30,001 -\$50,000	Other	141	154	173	120	122	141	161	136	187	216	1,335
- φ30,000	Percent HAL	6.0%	3.1%	0.0%	0.0%	0.8%	%	%	0.7%	%	%	1.2%
# =0.004	HAL	4	2	2	1	0	nan	nan	0	nan	nan	9
\$50,001 -\$75,000	Other	131	95	85	101	107	131	128	153	182	167	1,113
- φ13,000	Percent HAL	3.0%	2.1%	2.3%	1.0%	0.0%	%	%	0.0%	%	%	0.8%
\$75,001	HAL	5	0	0	0	0	nan	nan	1	nan	nan	6
- 0400	Other	73	55	52	74	83	82	68	80	101	113	668
\$100, 000	Percent HAL	6.4%	0.0%	0.0%	0.0%	0.0%	%	%	1.2%	%	%	0.9%
	HAL	4	1	0	0	0	nan	nan	1	nan	nan	6
\$100,001 -150,000	Other	67	70	62	80	82	94	113	113	113	132	794
-150,000	Percent HAL	5.6%	1.4%	0.0%	0.0%	0.0%	%	%	0.9%	%	%	0.8%
	HAL	8	4	0	0	0	nan	nan	0	nan	nan	12
Above \$150,000	Other	65	43	65	75	74	90	85	96	110	129	703
\$150,000	Percent HAL	11.0%	8.5%	0.0%	0.0%	0.0%	%	%	0.0%	%	%	1.7%
D .	HAL	1	0	0	0	0	nan	nan	0	nan	nan	1
Data Missing	Other	0	1	2	0	2	1	0	1	1	0	8
iviissii iy	Percent HAL	100.0%	0.0%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	%	11.1%
	Other	35	17	2	6	6	0	0	3	0	0	69
Total	HAL	539	493	508	530	529	591	597	646	747	828	6008
	Percent HAL	6.1%	3.3%	0.4%	1.1%	1.1%	0.0%	0.0%	0.5%	0.0%	0.0%	1.1%

B. PUBLIC INPUT DATA

Focus Group

Introductions

Comment: What do you identify as vacant housing?

Presenter: A vacant house could be rental property that is not being used by some out of town homeowner. They are just on the books. It could be abandoned. It could be...

Comment: Does that count an apartment complex?

Presenter: It could.

Comment: There is no way we grew 8,000 vacant units in seven years.

Comment: Actually, the Affordable Housing Study that we did through the Comprehensive Plan showed that from 2010 to now 8, just under 8,000 units were added. So that number lines up.

Comment: Added as vacant?

Comment: So, we added secondary occasional or whatever that category is, second homes basically. So, between condos and you think about the number of condos that we have added, it's and I agree with you. I made that face when they first told us that 19 percent of our housing stock was secondary, occasional or whatever that term is housing, 19 percent of our housing stock is that. I made the same face and then I started thinking about all of the people that I knew that had second homes. All the people that I knew had purchased second homes in Tuscaloosa for game day. That may actually be right.

Comment: Game day, really that many?

Comment: 19 percent.

Comment: I watch the stock of the student housing and I know you have some high vacancy rates in some of these developments because they are in management flux, but then I think 8,000 units?

Comment: The more that I have settled into the data, the more I believe that number, because let it resonate a little, let it simmer some.

Comment: I'll call him, because he has a pretty good beat on what the occupancy rates are, but that is...

Comment: A lot of vacancies.

Comment: That is just no way.

Comment: That is just a vacant complex right around town, there is one on 6th and it is vacant and just behind. You see them going up everywhere and it is not just the big ones. It is the smaller one too. I bet they are having problems.

Comment: How many units do you reckon?

Comment: I don't know. I have driven by.

Comment: Is that the one behind...

Comment: No, it is the one on 6th. It is behind...my father-in-law has a house right there (Not Discernable)

Comment: Okay.

Presentation

Comment: So that is saying since 2010 we have built 2,400 houses?

Presenter: Based on the data.

Comment: I believe that.

Comment: Single family and family units?

Comment: It can't be multifamily, because that would be by their numbers there would be 8,000 more to that.

Comment: 2,400 homes.

Comment: But this also aligns with what we found again in the Five-Year Affordable Housing study, the majority of our housing population was built, and this says that the majority of our housing stock is over 40 years old.

Comment: Do you know how many permits were pulled.

Comment: The numbers are fine.

Comment: Okay.

Presentation

Comment: How do you measure this? What are the numbers on the left mean as compared to the different groups on the bottom?

Presenter: The numbers on the left is showing the 2000 Census data as compared to 2010 and 2017 it is showing the dissimilarity index based on that time frame. So, it is showing your segregation of blacks, the percentage of the dissimilarity in 2010 compared to 2000 and 2010 and 2017. You can see the growth there from 2017. So, it increased as far as the disparity as far as

access to opportunity based on the segregation from HUDs data. Your African/Native American Indians which really jumped up in 2017 as far as disparity in access based on segregation. Although it is a small population Native Hawaiian, other, and Hispanic is way up. It is showing that this group doesn't have much access to opportunities as other groups and that is a contributing factor to fair housing. It could be transportation. It could be education. It could be a lot of things a that we are going to discuss.

Comment: So, somebody has taken this statistical data in our area and said okay we had in 2000 the black population had 50 percent, they had a score of 50 on their lack of access to housing opportunities?

Presenter: Yes, as far as the segregation part of it. Basically, this is HUDs data that was collected for the City of Tuscaloosa.

Presentation

Comment: So, is that poverty by racial group or just poverty or just racial group?

Presenter: It is just your racial area of poverty. It is by race. There is a high concentration in those two pockets.

Comment: Weston and Alberta.

Presentation

Comment: Let me mention that we are trying to correct all of these disparities. So, I just want everybody to know.

Presentation

Comment: We are currently have an RFP out for a new transportation study to help for the next five years.

Presentation

Comment: So, the lighter number is the good thing or the bad thing?

Presenter: Your lighter number is showing the disparity there in those...

Comment: Percent of disparity, right?

Presenter: As you get closer to the city it gets a little bit better as you go out there is less opportunity for those receiving those services or things of that nature.

Comment: Okay, less of an opportunity.

Presenter: The City is often identifying why is that and what can be done about it to ensure that those individuals are a protected class in those races and gain those same opportunities as those within.

Comment: If you were to go back to some of the other maps we just looked at, let's say that one is labor market engagement. The big dark area there is the Northern area of town, Tuscaloosa. It is provable an area where most of the higher income residents live. I would have thought that would've been a light color instead of the dark color or am I just interpreting the colors wrong?

Presenter: If you look at your RCAP areas you see the lighter shades there and the area left of it?

Comment: Yes, are you talking...

Presenter: As far as labor there is a disparity there as far as labor engagement. So, if your go farther north...

Comment: So, on here the darker the color is the greater and on the other the lighter the color it is...

Presenter: Yes, as far as the darker color you have a greater opportunity and the lighter color and a when it comes to each market. Now the labor market here for whatever reason is lighter toward the RCAP areas. Is there a disparity there?

Comment: I want to point out that some of that area on the north end of your study area is actually under water. It is the lake. You have colored filled in places where you don't have anybody living. On the edges you have houses built around the lake, but in terms of just the total area that is indicated some of that. So, on that one access to opportunity to employment that means that that dark blue area that is north of the river which is what we would expect has a high access to opportunity to employment because it is going to have low unemployment in that area, right?

Presenter: Right.

Comment: Your yellow area which is on the west part of town has lower access to employment because and we are saying lower access to employment because there is higher unemployment there.

Comment: Correct. That is the way that I see it.

Comment: The only problem that I have with that is interpreting high unemployment to low access to employment opportunities. Of course, it is all relative, because we have a pretty low unemployment rate in town.

Presentation

Comment: So, the light yellow appears, so up north there is going to be a higher transportation costs?

Presenter: Yes, because that is less access.

Comment: No public transport up the river.

Presenter: So, the City is going to be looking at actions to take to eliminate that barrier when it comes to low transportation.

Comment: Does the City get the opportunity to say alright lets evaluate the usefulness of our resources. There is not a need for public transportation north of the river in terms of looking at our concentration in terms of populations that needs access to public transport we don't need it up there so what put our resources up there?

Presenter: If the City can find that reason and justification, then the city would be okay with justifying that to HUD.

Comment: Transit study will show all of that.

Comment: I am for you, so I just don't want you all to get tagged for something. That's...

Comment: Believe me we are going to...

Comment: We can assume also that you are looking at the concentration of housing and the reason they need transit up there because you aren't able to live up there.

Presenter: That is what the City would document to justify their actions. If there is no action that needs to be taken...

Comment: I will grant you that the land costs are way too expensive north of the river to justify either public or private investment in affordable housing up there. I am not saying it is right or wrong, it just is, but frankly our land values across town are on average too high to get that land cost that is your biggest barrier top low-income housing.

Comment: We always say north of the river, no.

Comment: You have Not in My Backyard too.

Comment: I was going to say that the biggest thing that I see north of the river is that nobody wants multifamily up there at all, like at all. Even if it's market rate, even if it is workforce housing. Nobody wants multifamily up there.

Comment: There is legit arguments that and this would be the case anywhere that we don't have the infrastructure to support it from a transportation standpoint.

Comment: It is true.

Presenter: Based on what we discuss, if the index shows there is s higher transit trip index for those in that areas for them to get where they need to get to.

Comment: If you also use this just contextually, the school system already has it. (Not Discernable) they just built, and the school system just built a dental school and they were at capacity.

Comment: Part of what we are learning also through the Comprehensive Plan process right now is that a lot of and we have had multifamily developments built on the edges of town like the Grand Opry they haven't converted yet, but we also have what was that thing it is now the Legend...Landmark it used to be Boardwalk and Britton landing and it has converted from being four bedroom/bathroom units to ones, twos, and threes and the part that they have converted now is at 100 percent occupancy. So in discussions with the City Schools System they and we have brought that concept up to them and the look or terror in their face when we mentioned to them some of these outlying things have an opportunity to convert because there are schools in south east Tuscaloosa, southwest Tuscaloosa that are approaching capacity.

Comment: Down south?

Comment: Yes, so they are concerned that if more of them do convert what happens to school capacity down there?

Comment: (Not Discernable)

Comment: Right all kinds of fun.

Comment: So, with the acquisition of the site on Boardwalk and Britton, they have converted to...

Comment: Ones, twos, and threes and they are at 100 percent occupancy for the units that they have converted.

Comment: Those are Montgomery Housing.

Comment: Almost due east.

Comment: It sits up on the hill. It is converted to and it was built for student housing.

Comment: And they have converted it to traditional housing.

Comment: Is it market rate rent?

Comment: I had one of my boys live up over there. So, I think they are market rate.

Comment: That behemoth on 69 South is...

Comment: What do you do with it? The price has to be right and someone takes a wash no matter what happens when you convert one of them, but the price has to be right. We have looked into where you basically have to find a unicorn situation to convert it. There is that situation and the same group is looking at another property here to do the same thing with to convert from the fours to the one, twos, and threes.

Comment: Look at their occupancy rate and they will be desperate if you have any kind of financing on it.

Presentation

Comment: Why is that area in the middle of the town blue?

Presenter: How severe is your flooding?

Comment: Zero up there.

Comment: What accounts for the blues area in the middle of town?

Presenter: That RCAP area there?

Comment: that is what we are trying to figure out.

Comment: I feel like that is an error.

Presenter: Is it industry or plants or anything like that?

Comment: That is just south of town that is along the rail lines. If it is based on flooding okay.

Presenter: I am thinking about a far as where the RCAP area is. The lines I am looking at transportation and as far as toxic chemicals go and coming through. Not that they would spill anything, it is just the possibility.

Comment: Less exposure. I think that is an error. I think you may want to check on that. It also has got a swampy area too.

Comment: Do you think that is where APCO?

Comment: That has to be 35th Street. That would be an area where you picked up flood zones.

Comment: And hazard we didn't even know.

Comment: lust a little bit.

Comment: There is a chicken processing plant and a waste treatment facility.

(Crosstalk)

Comment: Earthy aromas.

(Crosstalk)

Presentation

Comment: Applications for...

Presenter: This is HMDA data. This is your housing mortgage data.

Presentation

Comment: So how does the City address mortgage lending standard for national lender.

Comment: I will say this. This is kind of the planning for policy. The lenders and the realtors are going to come in in another focus group and kind of offer their perspective as well.

Presenter: So, we are getting all sides. Your questions will be addressed to that group. Particularly the high denial rate. We know there are a lot of factor on lending and that is identified here.

Comment: Sure, and I can get where the City says we are use some money to do a program like the Housing Authority does or services programs where we are going to do financial literacy and do that, and I can see that.

Presenter: And that could be the City's plan. Education and outreach.

Comment: We addressed the last AI with the Housing Council.

Presenter: So, a lot of the things identified in the last AI will probably carry over as a continued effort by the City.

Comment: I am being kind of picky because I were a lot of hats. I have an active real estate firm practice; I represent the realtors association Board and I do a ton with mortgage lenders so that is why I am being a little picky.

Presenter: That is okay.

Presentation

Comment: So, how do you collect that data?

Presenter: HMDA collects that data. It is public data that we request from the mortgage disclosure group. It is all public data. It is not collected by WES or the City, we request it from HUD, and they provide it to the City as grounds for this stuff. So, there is nothing made up by the City.

Comment: I guess I am wondering if they are picking up notes off so appraise and saying here is the door thresholds are water damaged.

Comment: It needs to be replaced and things like that.

Comment: I will be honest that would be highly suspect because two different appraisers can look at it two different ways. I can assure you the mortgage lenders are not going out and doing a site visit on those houses.

Comment: That is currently what is going on. I see it every day.

Comment: What is that?

Comment: Appraisers. We had some where appraisers just go and do a hi thing.

Comment: They will drive by.

Comment: Drive by and when we send an inspector out there and you have wires hanging and no

we are not, and it is crazy.

Presenter: A lot of issues.

Comment: The HAMFI or less, what is that?

Presenter: Households with problem by income and race.

Comment: So that family income. What does the abbreviation stand for, HAMFI?

Presenter: That is HMDA data and I am drawing a blank on it.

Comment: HUD Area Median Family Income.

Presenter: That is actually HUDs data on that That is HUDs actual data that they are providing to the City to document their actions.

Presentation

Comment: Looking at that the bigger the dot the bigger the number of units. That is the number of units that is in that vicinity.

Presenter: Of those that are using housing choice vouchers.

Comment: Section 8.

Comment: It looks like it is spread around the City and it doesn't appear to be super major concentrated areas. To me that looks like a positive map.

Presenter: Housing vouchers is a positive. The only issue with housing vouchers is Not in My Backyard mentally because they are receiving HUD assistance, they figure it is something less of a standard, but it is to be utilized by all for housing no matter where the location. If I have the income and if I can afford it and if I can go, there and use that voucher I have the right to do so. So, housing vouchers are not a bad thing.

Comment: I wasn't implying that. I was just looking at ...

Comment: It is spread out.

Presenter: That is good. It looks like it is a good representation of the City. You really don't have a big issue there. I don't see that.

Presentation

Comment: Is that a line above Tuscaloosa right in the heart of town. What is that?

Comment: Robinsontown.

Comment: (Crosstalk)

Presenter: You are saying it is no longer there? As far as the data it could be documented, but maybe picked it up from a previous study as well.

maybe picked it up from a previous study as well

Comment: That was two years ago.

Presenter: Probably 2010 was it thee then?

Comment: It was converted to private ownership in 2017. That has got to be what it is.

Presentation

Comment: So that is not public housing?

Presenter: Multifamily assisted units, they could be a combination of HUD units, but they are just a

combination of just regular standard apartment complexes.

Comment: I don't think Jackson 3 is online yet. So that wouldn't be it. I can't figure out what it is.

Comment: Jackson 2.

Comment: Is there going to be a 3?

Comment: Do you know something that I don't know?

(Crosstalk)

Comment: We won't tell.

Comment: I think they still have units to replace. It is not a short-term plan. It is a long-term plan.

Presentation

Comment: There are five.

Comment: Two overlap, I see them.

Comment: Okay.

Presentation

Comment: The type of housing.

Presenter: The type of housing.

Comment: That is the biggest problem. You have very few traditional neighborhoods.

Comment: Traditional neighborhoods, we just had that in Stillwater, but that was in 06, but Stillwater just got approved, but any new subdivision that have been proposed like down Highway 69 South and in the area...

Comment: There are sewer issues.

Comment: There are sewer issues, but there are also NIMBY issues.

Comment: What?

Comment: Not in My Backyard issues.

Comment: I know it is real, but I have never heard it called NIMBY.

Presenter: That is what it is.

Comment: That is why we were talking about Jackson 3. I just don't want to go through that again.

Comment: I looked at development plan (Crosstalk)

Comment: Also, we have been talking through the ConPlan process and we have huge impediments based on our zoning ordinance in the ability to build anything that would be worthwhile. Smaller units, our lot dimension and are minimum lot sizes are still enormous even for a four lot to build something small on. How do we create something that looks like something that isn't like we are going to stick all of our affordable housing and here is all of our workforce housing in this one area on miniature lots that are and how do we go back to the 50 by 150 basically is what we need to be able to do.

Comment: It is like what he is doing for Housing Authority in Springer.

Comment: Where does that fit into this category?

Comment: Springer came in and it is a straight up subdivision and it was R-4.

Comment: It is all single-family homes and we are fixing to develop the last 36.

Comment: It is not R-4 now?

Comment: Springer is.

Comment: Hard to, that land is not zoned for multifamily.

Comment: No.

Comment: It is either R-2 or R-3.

Comment: It is R-2.

Comment: I am just ready for you to spend the money.

Comment: I have been given a directive to spend a whole bunch really quick. So, I am working on that

Comment: Agreement that is on our board agenda today.

Comment: My curiosity is what does HUD call the Springer development where these are first-time homebuyers that get low to moderate income and they get mortgage assistance in some manner and I don't know how that works.

Comment: Your Housing Authorities and its Central Office and HOME fund grants.

Comment: So, is that an arm inside HUD?

Comment: It is HUD funded.

Comment: The Housing Authority is the administrator.

Comment: There is a construction subsidy as well.

(Crosstalk)

Comment: With CDBG you can only do the infrastructure and HOME you do the construction Unless it is disaster recovery funding where you can has an exception to build a home. The regular CDBG you can not. You can do the infrastructure, the sidewalks, and all of the other stuff.

Comment: To your point if we want to do what is the workforce housing, then you need to go back to the 50 by 150 lot. All of that stuff that was in Alberta that got obliterated and if I wanted to walk between those houses, I had to turn sideways and hold my breath and that is what you need to do.

Comment: Yes, and we don't have that ability in our current codes today. My current codes today don't allow unless you have 22,500 square feet on a lot, you don't have the ability to have a guest house and you can't have a guest house no matter what unless you are in and we only allow accessory dwelling units and in Alberta and the Tuscaloosa forward zone. So, you don't have an ability to decrease the price on any lots anymore. You don't have the ability to supplement your own income and a mortgage by having an accessory structure for the back because we are fearful of the almighty student.

Comment: It is also cumbersome to the effect if you got one of these people that want to (Not Discernable)

Comment: I recognize fully my 1972 zoning ordinance has some challenge, hence is why we are trying to update it, but there is right now in 2019 I will be dealing with this kind of stuff until 2021. Until we update the codes.

Comment: It is not, it is the ability to build on a lot and it is twofold, the cost driver to build the bigger house on the bigger lot is a twin problem. It would be great on Springer to be able to build a least part of that are narrow houses with a lower cost point. I am not worried about the price point, but the lower cost point to get more bang for the buck.

Comment: The fact that Springer is R-2, Springer would have been a great R-3, Springer would have been a great R-4, but the idea of rezoning it to R-4 would have caused panic and fear in the neighbors because all of a sudden they are going to put apartment on it. That is where code update to the zoning ordinance is going to be so critical in that regard. So, it takes a little bit of that fear out of it and says no, no, no this is what the character is going to be, this is what the zone is going to allow, and to get more bang for the buck. I am not going to pretend that is not something that is real. People need to be able to build and our prices are astronomical.

Comment: (Not Discernable) small lots (Not Discernable)

Comment: Assimilate another lot, but kit is one of those things that you can't do. The code has...

Comment: The code has some very clear 1972 social issues written into it, because that is where we were.

Comment: The other question would be where are you going to get the dirt to build on?

Comment: So, there through the Affordable Housing Study what we found is that we have a lot of developable land and actually through the Comprehensive Plan progress there is a lot of developable land to the north which we already know price points. Also to the southeast, so the southeast area of the community there is a lot of developable land and up here one of the biggest things that I think this entire and it is not as much for the AI, but in general, there is a lot of property that has a propensity for change. Especially around the BA, aging populations are moving out and the homes are getting older and what do you do with that? It doesn't have a lot to do with coming in today and a rebuild, but you have a lot of potential in west Tuscaloosa as well to do some meaningful things.

Comment: (Not Discernable) at this point, I can tell you there is an exception in codes (Not Discernable)

Comment: How many subdivisions are tied up in litigation? (Not Discernable) They have to pay for it. Does anyone look to see is those lift stations are sized? (Not Discernable) capacity wise to where not only (Not Discernable) we have taken that station over (Not Discernable) If the e is available capacity in those systems it makes sense to me for the city to just go take them and get them up to their standards and bring those and the condition to what they are and now you have to come in. That is a policy decision.

Comment: You are talking about policy matters.

Comment: It is policy.

Comment: If you want the system to grow the resistance is going to be don't cut into the city school system.

(Not Discernable)

Presenter: Barriers with the type of housing and we know what groups are being effected by access to housing and the biggest question is what can the City do to help eliminate these barriers? It can't be solved today in this room.

Comment: The twin town of Ashley they can fix it all.

Comment: Thanks, I really appreciate that.

(Crosstalk)

Comment: You all study and found available land, because I haven't done any of this work, but is part of the idea and framework to say lets identify areas that need to be redeveloped and offer some incentivize to get them redeveloped?

Comment: So, we had a housing subcommittee that was formed from the steering committee for framework. The housing subcommittee looked student housing and workforce or affordable housing. Workforce/affordable housing because those two are actually different things. That group identified the need for infill development and for changes to happen potentially in some districts and some areas to help incentivize redevelopment and to incentivize doing something other than what we have been doing today. I think w we all know and you can look at different parts of the city and you can say we will never be able to run right into a zoning ordinance in this area that somebody can have an accessary dwelling unit, but you know what over here I could probably do that and it would be okay. I probably do it here and be okay and so that is part of what that group started to look at from the affordable housing perspective for the workforce housing perspective. What we do have to get a grip on though in terms of affordability and in terms of what we are doing as a city is student housing. We have to come to terms with what it is doing, and the impacts of student housing have on housing as a whole in Tuscaloosa. That is not a popular discussion that everybody wants to have.

Comment: I will tell you one thing about student housing (Not Discernable) Looking back on it now a mistake that the city made, an error that was made when and so when I started showing up to these developers in 2004 and 5, and they wanted to go remote and instead of evaluating them on a case by case basis somebody should have had the foresight to say if we are going to have high density development lets limit to areas where you can do a high density development, lets draw a road around it and everything else we are going to have a density limitation, a low density limitation. That would have and you would have made bank for the folks in this area around campus, but it has happened anyway, so it is like you haven't really done anything.

Comment: What we are showing and at the number 6 open house what you will see is two categories from a multifamily perspective really. You will see a university residential category for a

character type, and you are also going to see a multifamily character type. University residential clearly says what it is. It is going to be in the University area. Properties that are currently zoned R-4 and anything with that U designation will be in that area likely. Continue as we update the zoning ordinance, zoning map and we will continue that character type. The multifamily character type I think that is where we will start to see instead of 15 dwelling units per net site acre which basically encourages anybody who is nefarious in their intentions to go ahead and say we are going to do a three bedroom, three bath situation on the outskirts of town because we think that students are still going to come in, but we as a city have to start thinking about housing differently. We need definition for a student orientated development or a private dormitory or something along those lines so that projects will benefit lower invoke families are not impacted by our constant hands-off thing with multifamily for the City, because we think...

Comment: Private dormitory.

Comment: Private dormitory is the way to go, but then you know will you continue to have and there will always be a way to skirt something and I recognize that.

Comment: We know what sort of density we need.

Comment: To make it work.

Comment: Tend it towards that.

Comment: Private dormitories and it will be a lot easier to define that so that it does not impact traditional housing in the future.

Comment: Is there any bidding talked about in facilitating the establishment of...

Comment: So, it is actually a strategy to consider within the Comprehensive Plan.

Comment: Just the areas around the VA and due south of campus and that area.

Comment: We have seen and we know if can be done but we at this point in time we did not want to write a hard and fast rule into the comprehensive Plan that say a the City should start to landbank, but we did put it in there as a strategy to consider so that if that idea takes off...

Comment: You could just facilitate redevelopment in those areas that are transitioning and couple that with the loosening of...

Comment: Fix the zoning ordinance.

Comment: Fix the zoning ordinance you could get the redevelop in those areas to workforce housing.

Presenter: Any other comments that would help the City at this point or recommendations.

Public Forum

Presentation

Comment: The labor market is a transportation issue, because there are and I think the last statistic I heard was there are 3000 manufacturing jobs in Tuscaloosa County right now that they need people who can have a GED or high school diploma. You can pass a drug test, you can show up to work on time and but getting people there is a problem because we have such limited public transportation offerings. You may get that job and go to work. You might be able to buy a car, but you can't buy the car until you get the job.

Presenter: Domino effect. You know and I think for those who live in the city this is not that big deal, but those outside of service. So, transportation is an issue. How can those individuals be better assisted to be transported at low cost.

Comment: Jobs are far out.

(Not Discernable)

Presenter: I believe transportation was listed also in the Housing Study as well. There is a plan being generated as far as the AI is concerned.

Presentation

Comment: There's such a shortage of affordable housing for the workforce or whatever you want to call it. Housing for people, lower income working people, because of the everybody in the country just about as a shortage of affordable housing, but we have a unique situation in Tuscaloosa just because the University has doubled in size more or less in the last 20 years. And so the number of renters is greatly increased. And then you have the tornado coming through and it destroyed 70% of the homes destroyed for for people who make \$25,000 a year or less. So that disproportionately destroyed workforce housing, affordable housing, whatever you want to call it. And then was mainly didn't go back and student housing because of maybe found a person who could spend a ton of money on an apartment complex and I can charge \$600/\$800 per bedroom for a four bedroom apartment per bedroom or I can charge \$900 a month for one family. What am I going to be doing? So, we have a we have an interesting a different, a little bit of a difference spin on the affordable housing just because of the growth of the University and the tornado and then because of the growth of the University has made it challenging.

Presenter: And that was the system that (Not Discernible) Talking about seasonal so you have available housing that's available but it is not.

Comment: Not six weekends a year, but having to use the six weekends a year.

Presenter: But what can you do about it. Homeowners and landlords, I do what I want to do, but it effects the landscape for those who are seeking have (Not Discernable)

Presentation

Comment: Does that includes just existing housing for the people their house and I assess houses. People have been in that house for 50 years and they need that house to be accessible. They have four front steps and all kinds of issues. I don't know if that plays in, but that is a big issue. Not just a place to move into, but one that is accessible.

Presenter: That requires funding to make houses accessible for those who do not have a means to do that. There are not many programs around, but that is a challenge that the city needs to think about.

Presentation

Comment: To preserve their existing housing and upgrade as a standard and access to potentially new housing.

Comment: I don't think we talked so much about existing housing, but preserving units I think that would fall under that (Not Discernable) part of it is we do need to preserve (Not Discernable)

Comment: With existing housing and the kind of situation I was talking about id a person has been in that house for years and years and it is not good for them to be in that house. There are so few resources. These individuals for whatever reason don't have family, don't have the support to be able to rally to repair the home or fix the roof, there are other entities that working on a house. It is huge and especially that elderly population, they're not that kind of position to be able to pick up and move anyway. Over the years and they want to be in that house, but the house is falling down around them.

Comment: So, you got an elderly person who is on the edge of not being able to a safely live by themselves. But with accessibility features, they can continue for another year, maybe two years, three years, or maybe longer with family to help to live in their home. And you think about we spend \$10,000 or so to make a home handicap accessible. For instance we had an 88 year old, Korean War veteran who had an amputation, not from the war, but just you know, two years before we got along. And he was he was living at a hospital bed. He was living in his living room. He couldn't get his bathroom because his wheelchair was too wide. He had shag carpet on the floor and everything he did have ramps so you can get in and out, but, you know he, he had family help, but I mean obviously he couldn't really bath well, you know, I mean all those things, but we went instead of \$10,000 widen the doors at a roll in shower, widen the door to his bedroom, took us a carpet and put down, you know vinyl flooring or whatever. And all of a sudden he can continue indefinitely with family help to live in his home, as opposed to somebody from the government paying, you know, 50,000 a year for him to be in a nursing home. He would have been nursing home eligible just because of his mobility issues. But it's not the City of Tuscaloosa. But you know what I'm saying to different pockets of money, but it would be lovely to have Some kind of recognition that you know. (Not Discernable) now we could save \$150,000 over the years just because we're going to go and make this persons house accessible or you know, help them to age and place.

(Not Discernable)

Comment: Well for the city? So the city has does fund us with the CDBG funds and also we have that was some of those funds and we have a private grant for emergency repairs or accessibility from a private foundation for veterans and surviving spouses. And so, you know, we, we did diligently search for money, we get support from the city, federal funding too. There's a limited amount of things we can do, but...

Comment: Focus on the success stories, you know, its great, but it feels like a drop in the bucket. There is so much need.

Comment: I mean on the way to Washington's house we drove past 50 that needed a similar vein.

(Not Discernible)

Presentation

Comment: (Not Discernable) I have not personally I'm just curious as to how that process is contributing to (Not Discernable) African American group on the earlier slides. (Not Discernable) How many of those households have association in terms of their (Not Discernable) education (Not Discernible) I know and restitution and one of the conversations I had with someone who practiced law in the area and coming home, just how costly. (Not Discernable) Fresh set of eyes and ears

(Not Discernible)

Presenter: Next five years (Not Discernable)

Comment: I think one of the hopeful things, certainly I mean for the state is that there is a whole lot more emphasis on pre K education and getting kids ready to go to school. And I think that, you know, long term that's going to make a huge difference. And then there are the way that the Rotary Club started this and they are basically pairing people, they're pairing volunteers who is the most at risk kids. So, there are first graders not reading on level so they can really give an intensive, intensive help to those kids because, and I remember saying this but until you know until third grade you're learning to read. So, if you are not reading on grade level by third grade. You're not going to be able to read the things that you learn like social studies and math and all the other things. And so I think that they're the city schools has seen that the statistics with The program that the Rotary Club is doing that has worked for all of the kids except for maybe one that were are far behind and now are reading on grade level. So their adoptive school program for the school of doctors who will follow that up and send their employees, or whoever into those schools, pair them with struggling readers. You know, give them some help and we're fortunate to have (Not Discernable) pals of the other after school programs, that we've got a lot of student volunteers that can go in and help individual children. And I think that there is a bigger focus on that. And I think that that is going to help a lot of these kids that might have fallen through the cracks in times past to maybe the alongside that they are graduate from high school and they're going to some kind of Secondary Education, whether it's college or whether its trade school or you know, they're prepared for the workforce, and they have a job that can support their family rather than falling through the cracks and not getting the education that they need to be successful.

Presentation

Public Review Meeting

Presentation

Comment: We are going to do 20 this year with CDBG funding.

Presenter: Are these going at the minimum?

Comment: We are heading that way.

Presentation

Comment: And we have roofs from a different source. So we'd love to do 30 or 50 units.

Presenter: So, you are tackling the burden of...

Comment: Next year and in addition to the 2025.