

CITY OF DANVILLE VIRGINIA

ANALYSIS OF IMPEDIMENTS

2020 – 2024 Five Year Plan



Analysis of Impediments June 17, 2019



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I. Executive Summary

The preparation of the Analysis of Impediments (AI) serves as a component of the efforts of the City of Danville to satisfy the requirements of the Housing and Community Development Act of 1974. This act requires that any community receiving Entitlement funding under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), Emergency Solutions Grant (ESG) and the public housing authorities “affirmatively further fair housing.”

The federal Fair Housing Act prohibits discrimination in housing based on a person’s race, color, religion, gender, disability, familial status, or national origin. In addition, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as “members of the protected classes.”

This Analysis of Impediments is a review of demographic data, metrics of discrimination and disparity, and local regulations and administrative policies, procedures, and practices that affect the location, availability, and accessibility of housing. It also assesses the conditions, both public and private, that affect fair housing choice.

A citywide analysis and discussion on the trends and issues relating to housing drove the development of the AI. The community engagement process solicited multiple perspectives including those of government agencies, City Boards and Commissions, fair housing advocates, social service agencies, housing developers, apartment owners, non-profit organizations, business and industry, civic and neighborhood associations, educational institutions, public and assisted housing residents and the general public.

Strategic planning sessions were held with City of Danville Community Development Department (CDD) staff and other City Department representatives with policy, regulatory and program responsibilities that potentially impact housing, fair housing and neighborhoods to refine the work plan and approach for the AI and to identify key issues and data for the analysis. Public Forums and Stakeholder Focus Group sessions were held May 28th and 29th, 2019 at the City of Danville City Hall Building, 427 Patton Street, Danville, Virginia 24541. Supplemental interviews were conducted with and information and input received from various city departments, public and elected officials, Nonprofit and for-profit developers, Continuum of Care organization, community, professional and industry representatives to obtain information from those unable to attend the sessions.

The combination of quantitative data analysis and qualitative research identified a series of factors that significantly contribute to fair housing issues in Danville. These contributing factors were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are organized into groups that align with the issues discussed in the Fair Housing Analysis section of the AI: (B)(i) Segregation/Integration; (B)(ii) Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs); (B)(iii) Disparities in Access to Opportunity; (B)(iv) Disproportionate Housing Needs; (C) Publicly Supported Housing; (D) Disability and Access; and (E) Fair Housing Enforcement, Outreach Capacity, and Resources.

Acknowledgements

The following organizations were consulted with and or invited to provide input during the community participation process:

Government Departments, Agencies

Housing and Redevelopment Authority of City Danville
City of Danville Community Development Department
City of Danville Community Development Advisory Committee

Real Estate and Economic Development

Board of Realtors
Chamber of Commerce

Banking and Mortgage Companies

Housing Developers, Builders and Contractors

Builders
Construction Industry
Nonprofit Developers

Home Buyer Education and Credit Counselors:

City of Danville Mayor and City Council

Agencies and Organizations:

Continuum of Care
Council on Aging

Religious Institutions and Faith Based Organizations

Educators and Institutions

Non-Profit and Community Services Organizations

II. Community Profile

Introduction

The Community Profile is a review of demographic, income, employment, and housing data of Danville, Virginia, gathered from the 2010 Census estimates, 2013-2017 American Community Survey (ACS) 5-Year estimates, 2010 U.S. Census, City of Danville, and other sources. The following sections provide a look at the current status of the community in Danville:

- Demographics - looks at the basic structure of the community in terms of racial diversity, population growth, and family structure.
- Income - analyzes income sources, the distribution of income across income class, and poverty.
- Employment - examines unemployment rates, occupation trends, and major employers.
- Public Transportation – looks at the access and availability of public transit system.
- Housing - examines data on the housing stock, with particular attention to the age of the housing stock, vacancy rates, tenure, and cost burdens.

Detailed analyses will concentrate on the three major ethnic groups in Danville: White, African American, and Hispanics. All other ethnic groups are smaller in number and percentage and, therefore, will not be examined and presented in as much detail. The profiles are supported with tables and maps provided as reference materials. Most of the data presented in the tables and maps are directly referenced in the text. There may be some cases where additional information was included for the reader's benefit, though not specifically noted in the text.

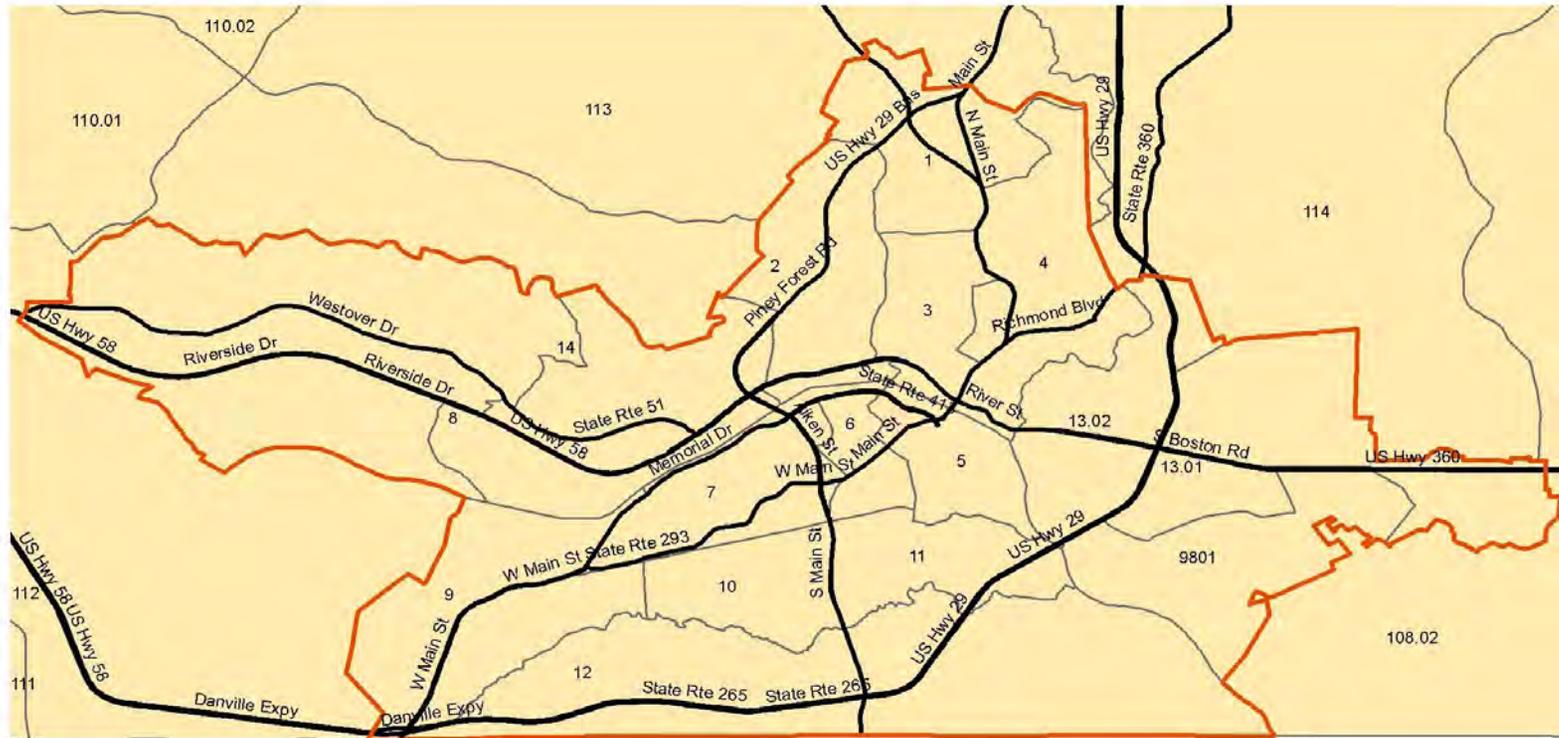
1.1. Demographics

The demographic analysis of Danville concentrates on the magnitude and composition of the population and changes that occurred between 2010 and 2017. Please note that the attached maps present data by census tract with an overlay of the city limits. For reference, Map 1.1, on the following page, provides a visual representation of Danville.

Map 1.1: Danville, Virginia

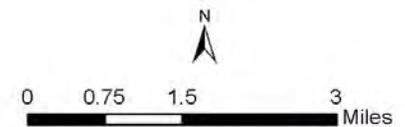
Danville Analysis of Impediments to Fair Housing Choice

Source: U. S. Census



Legend

-  Danville City Limits
-  Major Roads
-  Census Tracts 2010



Map 1.1: Source: 2013-17 American Community Survey (ACS) – U.S. Census

According to the 2017 Census estimates, the total population of Danville was 41,911. Table 1.1, below, shows that the total population of the city decreased by 4 percent between 2010 and 2017. Danville experienced a significant increase in the Hispanic population, increasing 41 percent between 2010 and 2017. The percentage of Hispanic population when compared to the total population increased from 2.6 percent in 2010 to 3.9 percent in 2017, a 1.3 percentage point increase. The Census Bureau does not recognize Hispanic as a race, but rather as an ethnicity. It is a common misidentification for ethnic Hispanics to choose the 'other' category on the Census for race rather than White or African American.

Table 1.1
Total population by race and ethnicity for Danville, 2010 and 2017

Race	2010		2017		% Change 2010-2017
	#	%	#	%	
Danville					
White	21,357	48.7%	19,162	45.7%	-10%
Black or African American	21,061	48.1%	20,614	49.2%	-2%
American Indian and Alaska Native	73	0.1%	40	0.1%	-45%
Asian	353	0.8%	402	1.0%	14%
Native Hawaiian and Other Pacific Islander	8	0.02%	28	0.1%	250%
Some other race	650	1.4%	495	1.2%	-24%
Total	43,787	100%	41,911	100.0%	-4%
Hispanic (ethnicity)	1,152	2.6%	1,625	3.9%	41%

Table 1.1 Source: 2013-17 American Community Survey (ACS) – U.S. Census

Danville’s population increased between 2010 and 2017, and the City’s population has become more racially and ethnically diverse. However, there are areas of the city with concentrations of minority populations and concentrated poverty.

Danville’s population decreased by 4 percent between 2010 and 2017. The percentage of minorities increased from 49 percent in 2000 to 51.6 percent in 2017.

The White population decreased by 10 percent, and their percentage of the total population decreased from 48.7 percent to 45.7 percent between 2010 and 2017. African Americans made up 48.1 percent of the population in 2017, a 2 percent

decrease over the 7-year period. The American Indian and Alaska Native population decreased by 45 percent and the Asian and Pacific Islander population increased by 250 percent between 2010 and 2017, but constituted only 0.2 and 1.0 percent respectively, of the total population of the city in 2017.

On the following pages are a series of Maps 1.2 through 1.5 illustrating spatial concentrations of the various racial and ethnic groups within Danville.

Map 1.2 Percent African American

Legend:

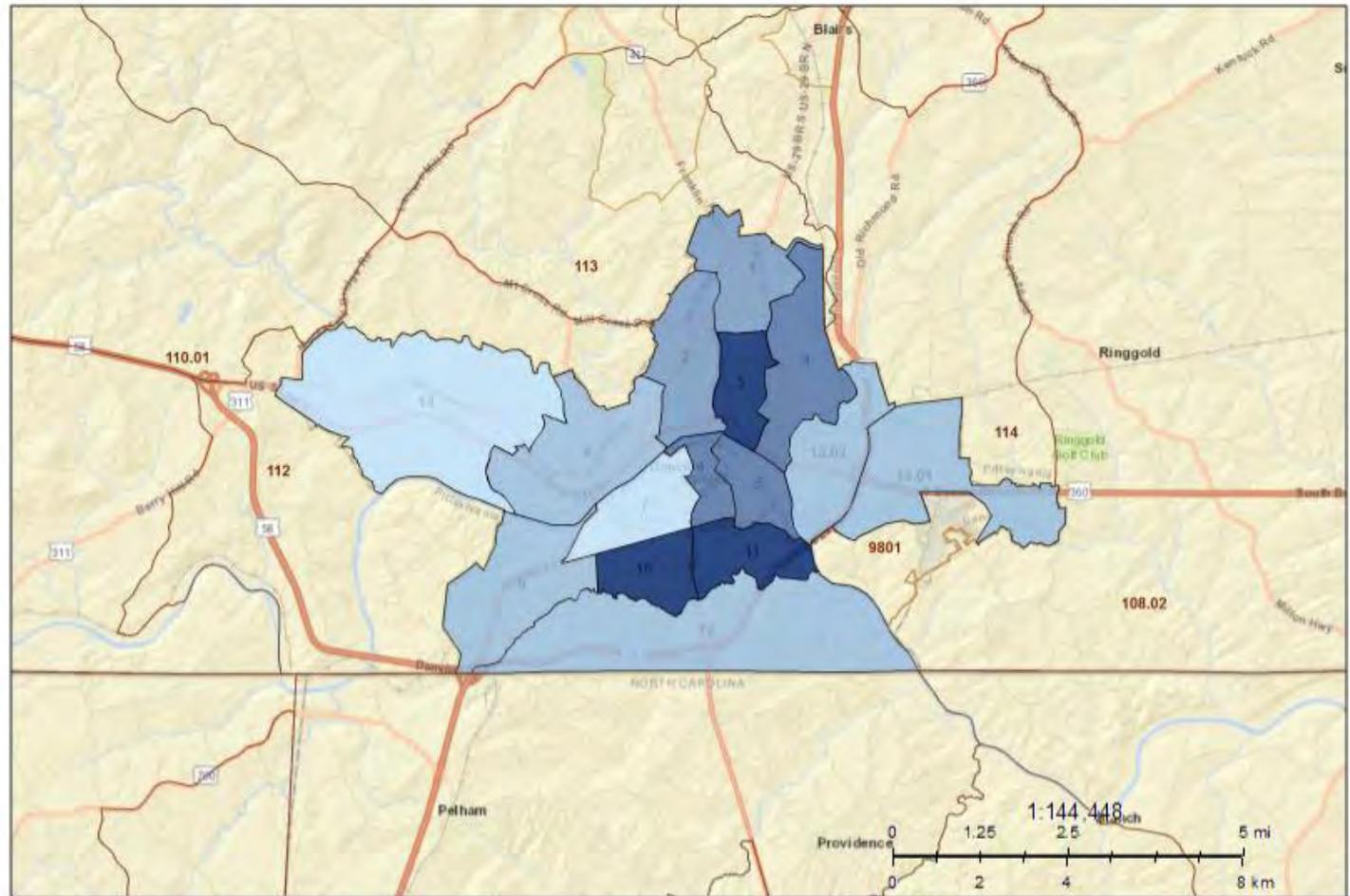
Data Classes

Percent

- 7.0 - 22.9
- 34.0 - 43.8
- 51.2 - 55.7
- 68.6 - 72.8
- 75.1 - 78.3

2017 Boundaries

- Census Tract
- Place



Map 1.2: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.3 Percent Hispanic

Legend:

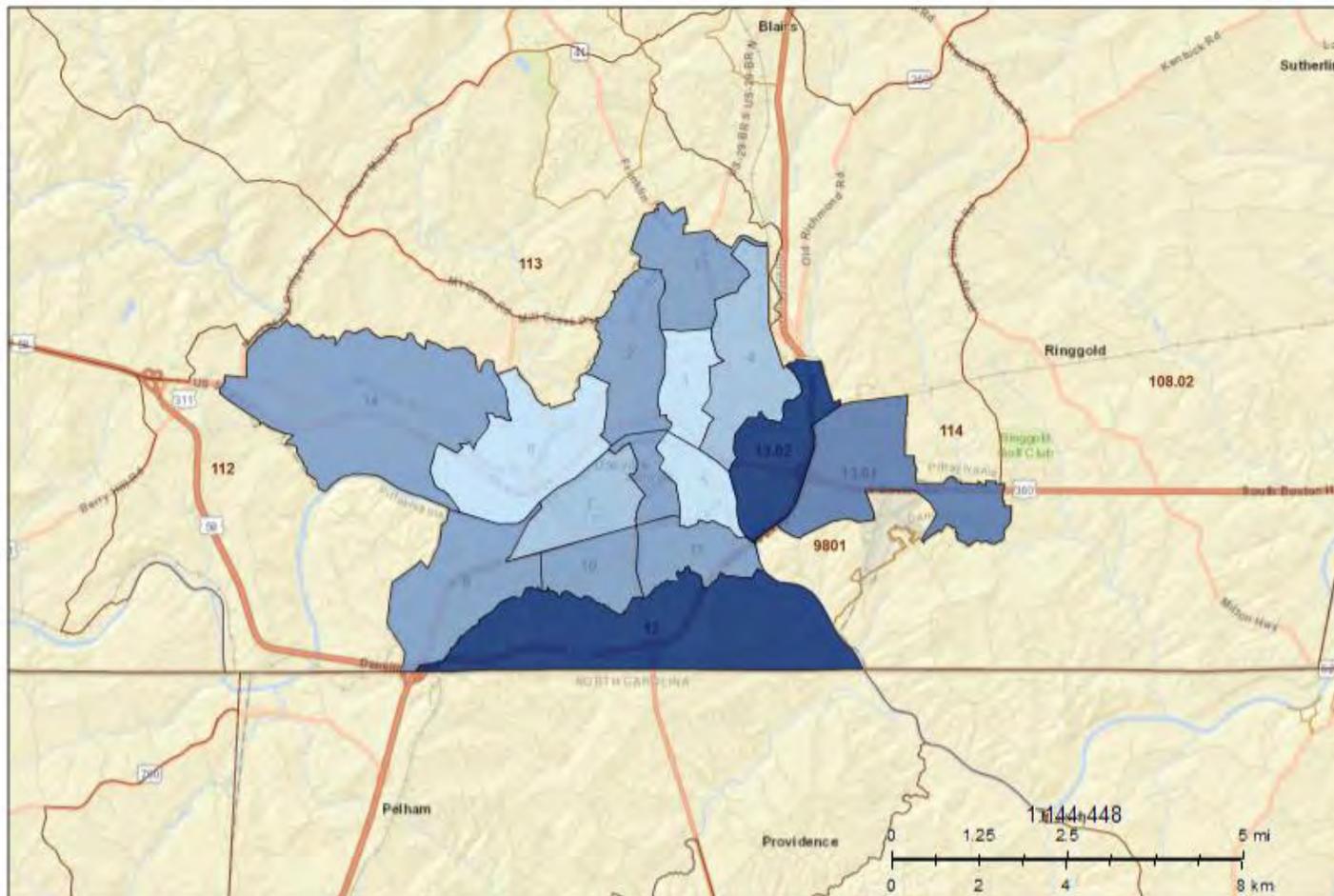
Data Classes

Percent

- 0.0 - 0.9
- 1.5 - 2.4
- 3.7 - 5.2
- 7.6 - 7.6
- 11.1 - 14.0

2017 Boundaries

- Census Tract
- Place



Map 1.3: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.4 Percent American Indian and Alaska Native

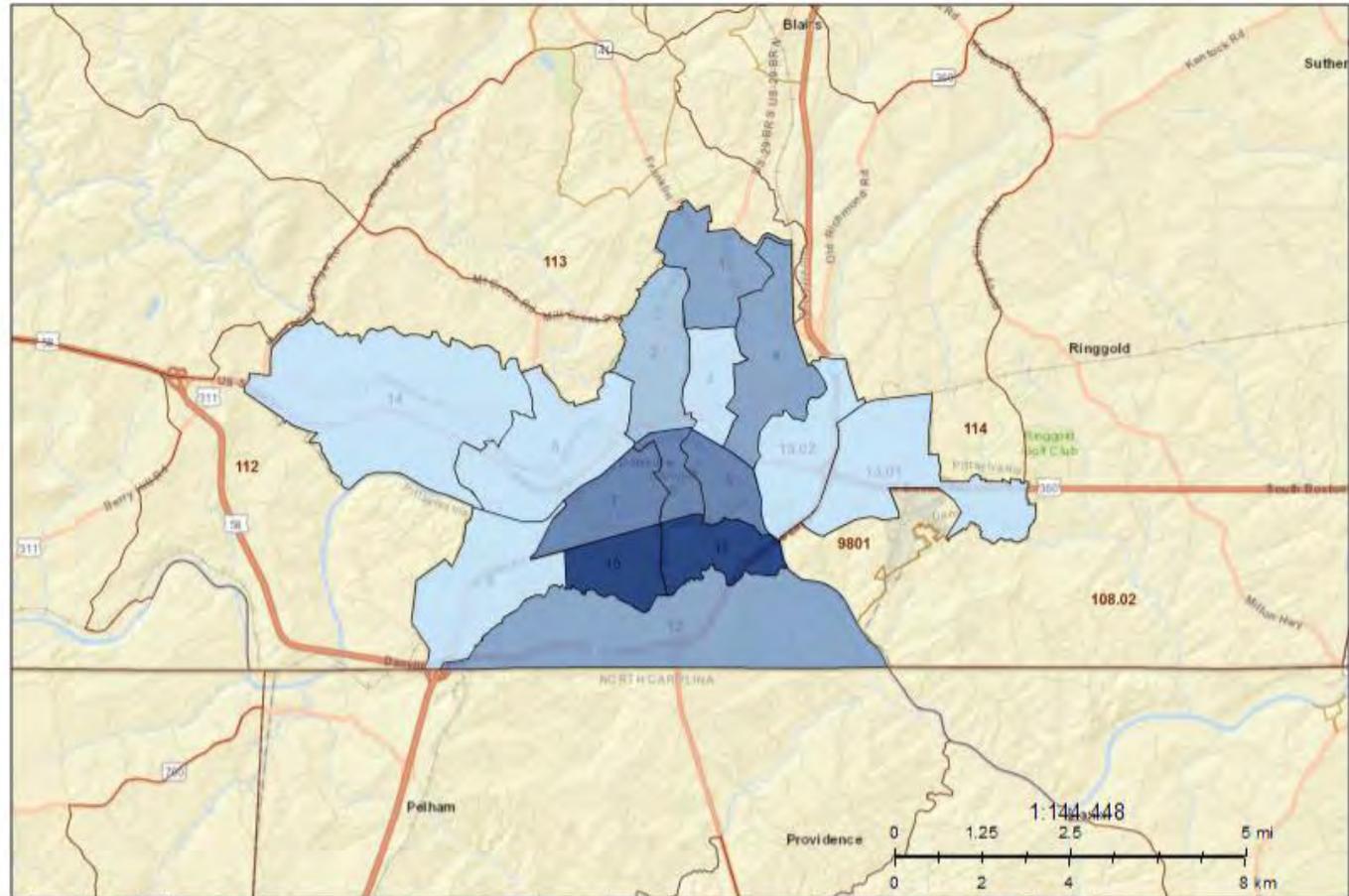
Legend:

Data Classes
Percent

- 0.0 - 0.2
- 0.5 - 0.5
- 0.8 - 1.1
- 1.6 - 2.0
- 3.2 - 4.8

2017 Boundaries

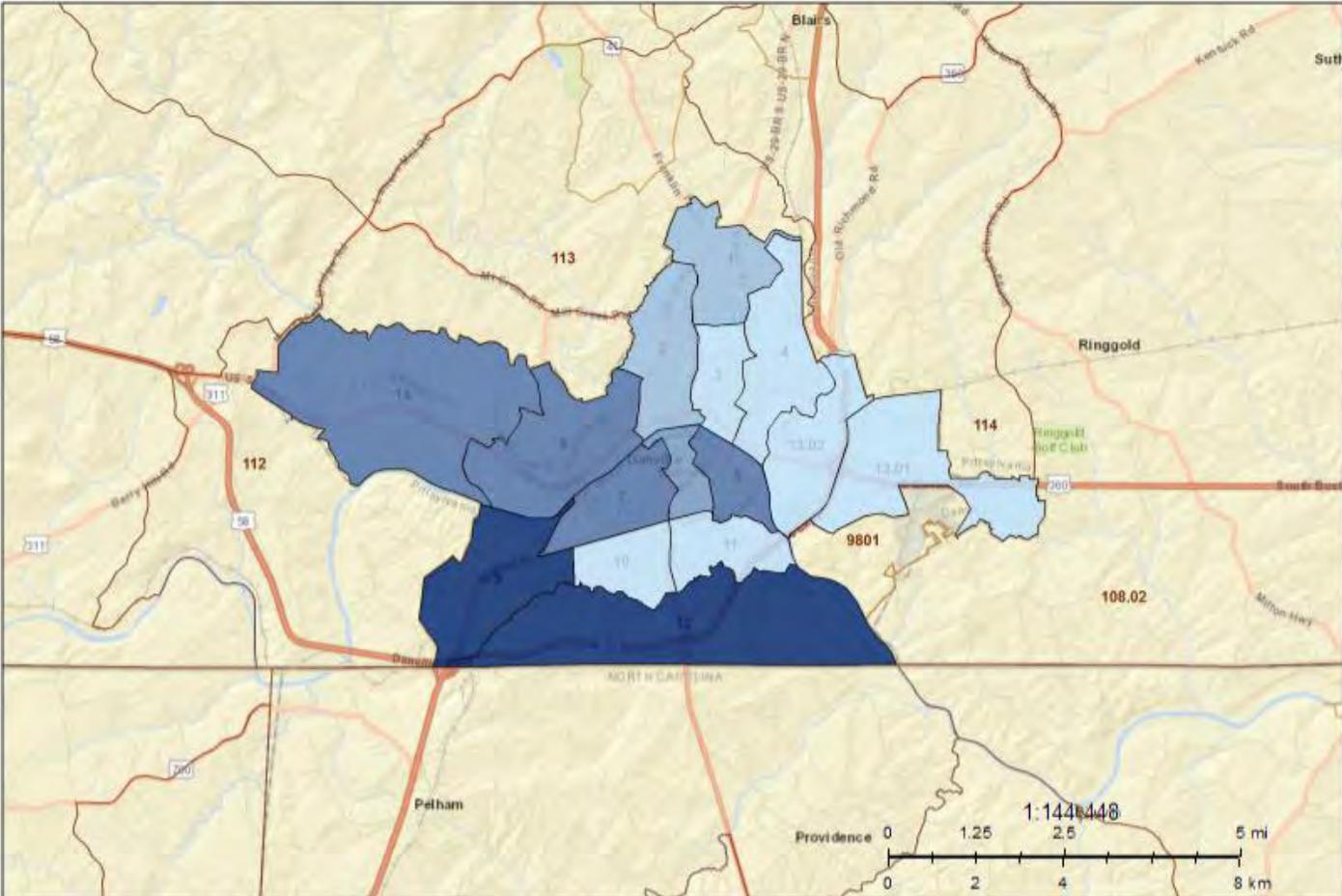
- Census Tract
- Place



Map 1.4: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.5 Percent Asian and Pacific Islander

- Legend:**
- Data Classes**
- Percent
- 0.0 - 0.3
 - 0.9 - 1.2
 - 1.5 - 1.5
 - 2.1 - 2.7
 - 3.0 - 3.2
- 2017 Boundaries**
- Census Tract
 - Place



Map 1.5: Source: 2013-17 American Community Survey (ACS) – U.S. Census

In many communities, female-headed households and female-headed households with children face a high rate of housing discrimination. Higher percentages of female-headed households with children under the age of 18, sometimes correlates to increases incidents of reported rental property owners' refusal to rent to tenants with children. This factor is evidenced when comparing this demographic factor to fair housing complaint data. As shown in Table 1.2, on the following page, the percentage of female-headed households among White households in the city was 9 percent, compared to 32 percent in African American households, and 11 percent in Hispanic households. Only 26 percent of African American households were husband/wife family households, compared to 40 percent of White households and 59 percent of Hispanic households.

Non-family households as a percentage of total households for all three of the major races/ethnicities were comparable. Non-family households among Whites made up 46 percent of all White households in Danville. Non-family households among African Americans accounted for 38 percent of all African American households. Non-family households among Hispanics accounted for 18 percent of all Hispanic households. Table 1.2, on the following page, shows the family structure of White, African American, and Hispanic households between 2013 and 2017.

Table 1.2
Household structure by race for Danville, 2013-2017 (5-Year Average)

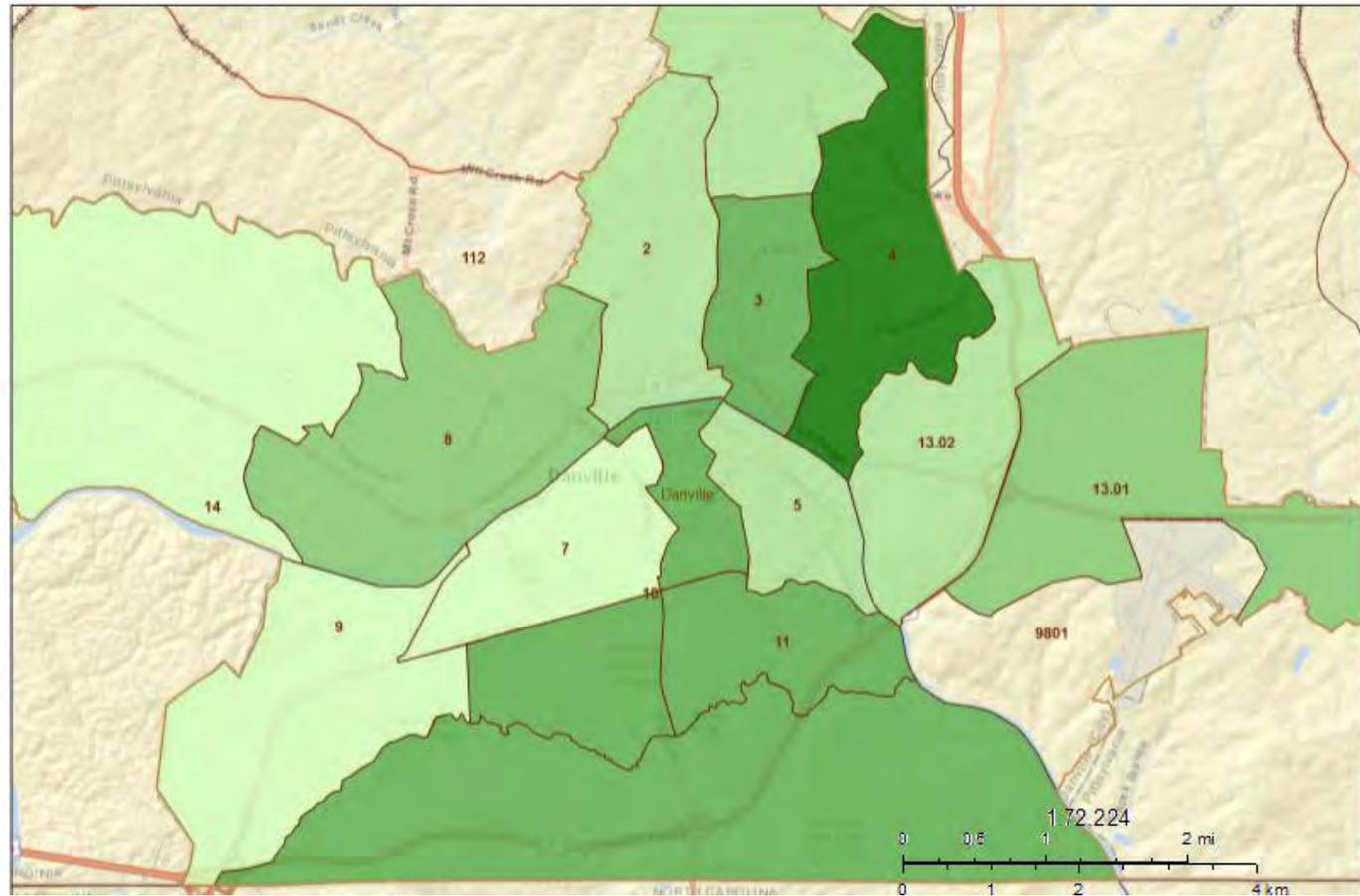
Household Type	White Non-Hispanic		African American		Hispanic	
	# of Households	% of Households	# of Households	% of Households	# of Households	% of Households
Family households:	4,782	54%	5,442	62%	306	82%
Married-couple family	3,574	40%	2,299	26%	220	59%
Other family:	1,208	14%	3,143	36%	86	23%
Male householder, no wife present	366	4%	360	4%	43	11%
Female householder, no husband present	842	9%	2,783	32%	43	11%
Nonfamily households:	4,130	46%	3,318	38%	68	18%
Householder living alone	3,687	41%	2,733	31%	51	14%
Householder not living alone	443	5%	585	7%	17	5%
Total Households	8,912	100%	8,760	100%	374	100%

Table 1.2: Source: 2013-17 American Community Survey (ACS) – U.S. Census

The spatial distribution of female-headed households with children is shown in Map 1.6, on the following page.

Map 1.6 Percent Female Headed Household

- Legend:**
- Data Classes**
Percent
- 6.9 - 12.9
 - 17.3 - 19.6
 - 20.2 - 22.3
 - 25.0 - 27.8
 - 37.6 - 37.6
- 2017 Boundaries**
- Census Tract
 - Place



Map 1.6: Source: 2013-17 American Community Survey (ACS) – U.S. Census

1.2. Income

Low-income households are statistically more likely to be housed in less desirable housing stock and in less desirable areas of city. Lack of funds often prevents those households from moving to areas where local amenities raise the value of the housing. Income plays a very important part in securing and maintaining housing.

The data in Table 1.3 and Chart 1.1, on the following page, show the distribution of income across income classes among Whites, African American, and Hispanics. Overall, the income distribution data show a higher proportion of low-income households within the African American and Hispanic communities. In general, limitations on fair housing choice are more commonly found to affect housing decisions among low-income persons.

Chart 1.1 shows that the modal income classes (the income classes with the highest number of households) for Whites were the \$35,000 to \$49,999 with 26.4 percent of Whites in this income range. The most frequently reported income for African American households was the less than \$10,000 range with 13.9 percent of African Americans in this range. The most frequently reported income for Hispanic households in the 2013 - 2017 ACS data was the \$45,000 to \$74,999 range with 48.4 percent of Hispanics in this range.

According to the 2013 - 2017 ACS estimates (5-year average), the median household income was reported to be \$41,425 for White households, \$29,954 for African American households and \$52,353 for Hispanic households, compared to \$34,951 for the overall city. Map 1.7, on page 14, shows the median household income by census tract between 2013 and 2017. Again, there were major disparities in income among minorities, particularly for African Americans.

Table 1.3
Households by race by income for Danville, 2013-2017

Household Type	White Non-Hispanic		African American		Hispanic	
	# of Households	% of Households	# of Households	% of Households	# of Households	% of Households
Less than \$10,000	751	8.43%	1223	13.96%	24	6.42%
\$10,000 to \$14,999	606	6.80%	896	10.23%	0	0.00%
\$15,000 to \$19,999	700	7.85%	624	7.12%	0	0.00%
\$20,000 to \$24,999	547	6.14%	889	10.15%	11	2.94%
\$25,000 to \$29,999	500	5.61%	754	8.61%	58	15.51%
\$30,000 to \$34,999	694	7.79%	645	7.36%	6	1.60%
\$35,000 to \$39,999	576	6.46%	585	6.68%	5	1.34%
\$40,000 to \$44,999	565	6.34%	314	3.58%	0	0.00%
\$45,000 to \$49,999	522	5.86%	422	4.82%	67	17.91%
\$50,000 to \$59,999	663	7.44%	389	4.44%	62	16.58%
\$60,000 to \$74,999	851	9.55%	582	6.64%	52	13.90%
\$75,000 to \$99,999	749	8.40%	743	8.48%	22	5.88%
\$100,000 to \$124,999	475	5.33%	405	4.62%	24	6.42%
\$125,000 to \$149,999	227	2.55%	162	1.85%	0	0.00%
\$150,000 to \$199,999	227	2.55%	101	1.15%	0	0.00%
\$200,000 or more	259	2.91%	26	0.30%	43	11.50%
Total	8,912	100%	8,760	100%	374	100%
Median Household Income	\$41,425		\$29,954		\$52,353	

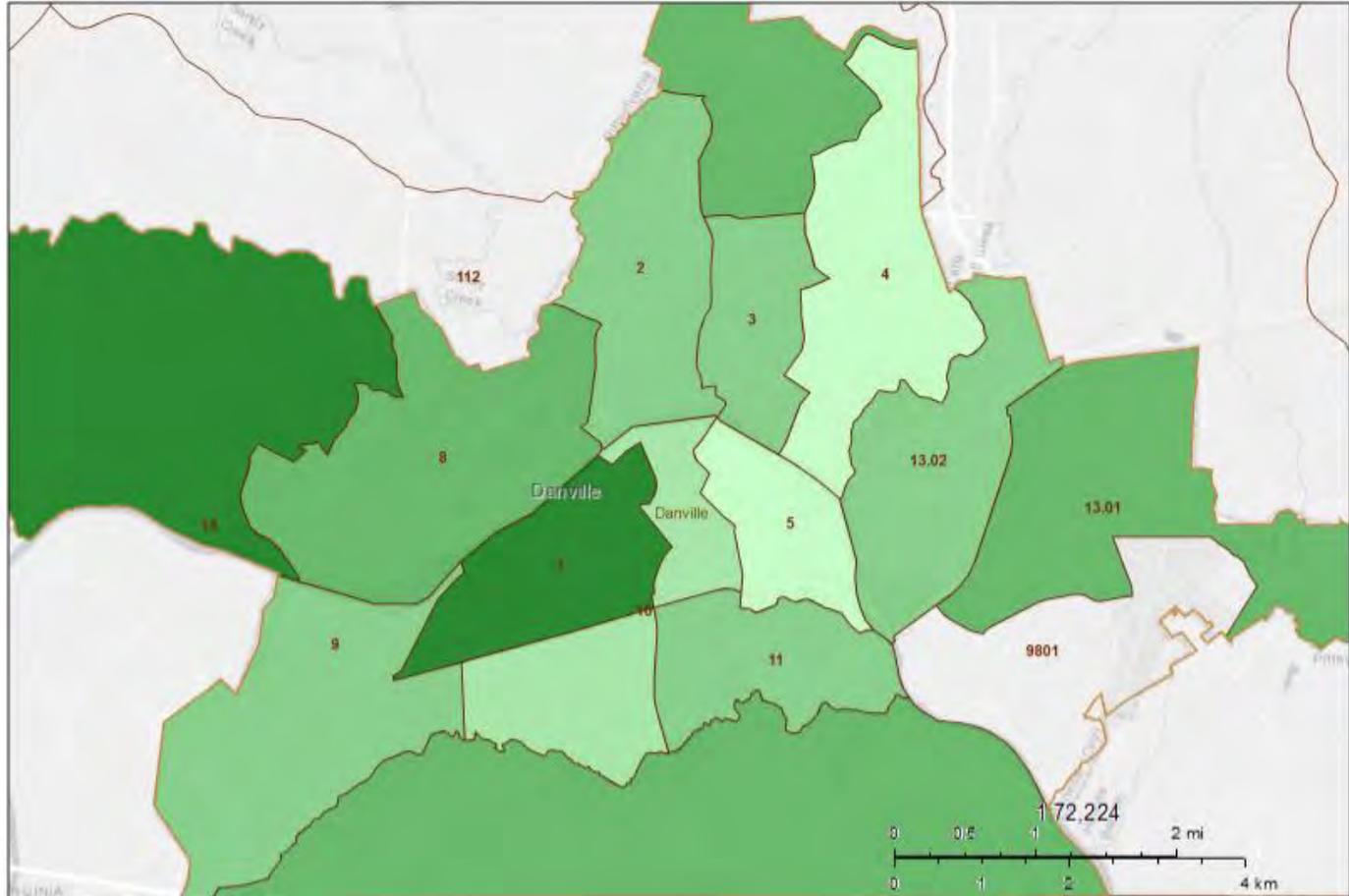
Table 1.3: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Household income levels among African Americans were disproportionately lower compared to Whites.

The modal income class for Whites was the \$35,000 to \$49,999 range, and that of African American households was the less than \$10,000 range.

Map 1.7 Median Household Income

- Legend:**
- Data Classes**
- 16,779 - 20,981
 - 23,903 - 25,750
 - 30,737 - 35,268
 - 39,129 - 45,500
 - 49,886 - 54,219
- 2017 Boundaries**
- Census Tract
 - Place



Map 1.7: Source: 2013-17 American Community Survey (ACS) – U.S. Census

The poverty data in Table 1.4, below, shows major effects on the African American and Hispanic communities. The incidence of poverty among African Americans was 27.8 percent of the total population between 2013 and 2017, and Hispanics was reported to be 13.4 percent. Among White persons, the data reported 12.6 percent lived in poverty. In comparison, the poverty rate for the city was 21.5 percent during the period.

Table 1.4
Poverty Status by race Danville, 2013-2017

Age Group	White Non-Hispanic		African American		Hispanic	
	# in Poverty	% in Poverty	# in Poverty	% in Poverty	# in Poverty	% in Poverty
Under 6 years	97	4.4%	671	12.1%	48	23.4%
6 to 11 years	192	8.6%	612	11.0%	50	24.4%
12 to 17 years	72	3.2%	705	12.7%	39	19.0%
18 to 59 years	1362	61.3%	2704	48.7%	68	33.2%
60 to 74 years	285	12.8%	754	13.6%	0	0.0%
75 to 84 years	100	4.5%	87	1.6%	0	0.0%
85 years and over	115	5.2%	22	0.4%	0	0.0%
Total	2,223	12.6%	5,555	27.8%	205	13.4%

Table 1.4: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Higher percentage of African Americans and Hispanics lived in poverty, compared to Whites between 2013 and 2017.

The poverty rate among African Americans was 27.8 percent, Hispanics was 13.4 percent, compared to White persons was 12.6 percent between 2013 and 2017.

Areas of Concentrated Poverty and Racial / Ethnic Concentration and Segregation (RCAP/ECAP)

The U. S. Department of HUD has defined “Areas of Poverty, Racial and Ethnic Concentration and Segregation (R/ECAP) – as areas or census tracts within a jurisdiction comprised of 50% or greater minority population and 3 times or more the poverty level of the MSA and generally lacking the basic amenities and failing to provide a quality of life expected and desired for any area within the MSA. The goal of de-concentration would be to achieve minority concentrations and poverty level less than defined above by R/ECAP and to transform these areas of concentration into “Opportunity Areas”. Opportunity Areas – areas offering access to quality goods and services, exemplary schools, health care, range of housing, transportation to employment and service centers, adequate public infrastructure, utilities, and recreation. The Map 1.8 on the following page depicts the census tract defined as concentrated and segregated as defined by the HUD R/ECAP Calculation.

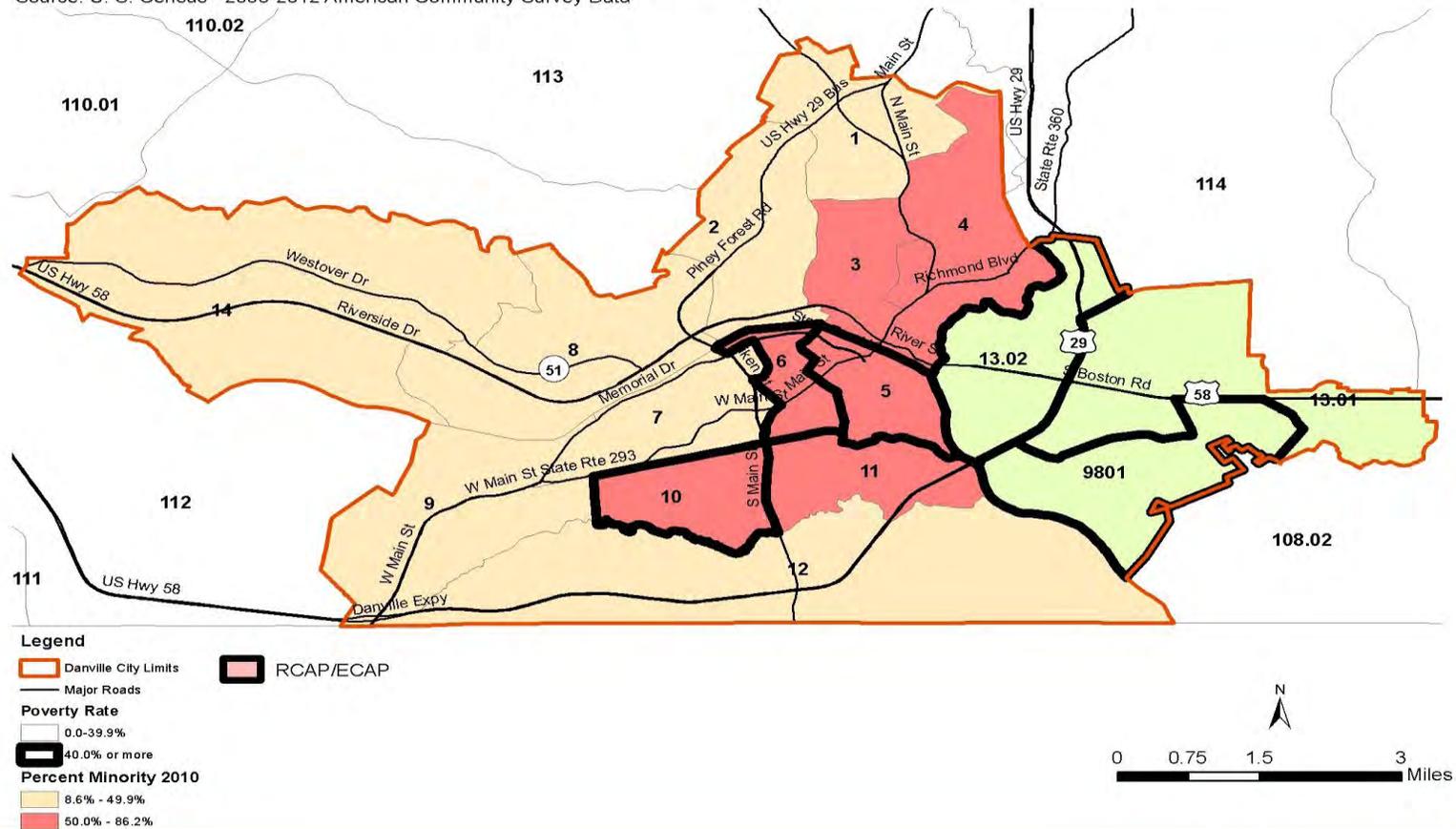
The poverty rate in Danville Metro Area is 21.5 percent. Three times the poverty is 64 percent, so 40 percent is the poverty threshold for the RCAP/ECAP criteria for the city. The census tracts within the City of Danville that are comprised of 50 percent or greater minority population and 40 percent and greater poverty rate are in the central City of Danville, east of U.S. Highway 29 Business, Piney Forest Road, West Main Street and State Route 293.

In addition to poverty, racial and ethnic concentrations and segregation, these areas contain housing units in very poor condition and neighborhood conditions and infrastructure that needs improvement in order for conditions to be reversed and become areas of opportunity.

Map 1.8: Areas of Concentrated Poverty and Racial/Ethnic Concentration and Segregation (RCAP/ECAP)

Danville Analysis of Impediments to Fair Housing Choice

Source: U. S. Census - 2008-2012 American Community Survey Data



Map 1.8 Source: 2013-17 American Community Survey (ACS) – U.S. Census

1.3. Employment

Employment opportunities in the area and educational levels of the employees make a significant impact on housing affordability and the location choice of residents. Table 1.5, below, provides a look at occupation data, which indicate that there has been some shift in the distribution of occupations between 2010 and 2017. Agriculture, forestry, fishing and hunting, and mining had the largest increase during the period, up 182 percent. The Finance and insurance, and real estate and rental and leasing sector had an increase of 38.9 percentage points. The Educational services, and health care and social assistance sector had an increase, of 15.7 percentage points. Information realized the largest reduction with 64.4 percentage points.

Table 1.5
Occupation of employed persons for Danville, 2000 and 2013 - 2017 (5-Year Average)

Industry	2010	2013-2017 Average	% Change
Agriculture, forestry, fishing and hunting, and mining	45	127	182.2%
Construction	1,168	903	-22.7%
Manufacturing	3,296	2,576	-21.8%
Wholesale trade	353	196	-44.5%
Retail trade	2,353	1,957	-16.8%
Transportation and warehousing, and utilities	542	553	2.0%
Information	323	115	-64.4%
Finance and insurance, and real estate and rental and leasing	540	750	38.9%
Professional, scientific, and management, and administrative and waste management services	1,211	1,267	4.6%
Educational services, and health care and social assistance	4,470	5,173	15.7%
Arts, entertainment, and recreation, and accommodation and food services	1,496	1,668	11.5%
Other services, except public administration	963	658	-31.7%
Public administration	1061	871	-17.9%

Table 1.5: Source: 2013-17 American Community Survey (ACS) – U.S. Census

The data presented in Table 1.6, provide a portrait of the distribution of the unemployed. A closer look at the make-up of this total, however, indicates that much higher levels of unemployment are centered in the African American community. Between 2013 and 2017, 6.4 percent of White persons age 16 and over reported being unemployed. African Americans persons in the same age group reported a 13 percent unemployment rate and Hispanic reported a 10.3 percent rate. As a comparison, the citywide unemployment rate was 10.1 percent during the period.

Table 1.6
Employment Status by race for Danville, 2013 - 2017

Employment Status	White Non-Hispanic		African American		Hispanic		Total	
	#	%	#	%	#	%	#	%
In Labor Force:	8,139	51.2%	9,534	60.2%	602	62.0%	18,275	35.9%
In Armed Forces	40	0.5%	0	0.0%	0	0%	40	0.22%
Civilian	7,280	89.4%	9,049	95%	602	100%	16,931	92.6%
Employed	7,631	105%	8,376	93%	480	79.7%	16,487	97.4%
Unemployed	468	6.4%	1,158	13%	122	20.3%	1,748	10.3%
Not in Labor Force	7,766	49%	6,291	40%	369	38.0%	14,426	28.3%
Total	15,905	100%	15,825	100%	971	100%	50,926	100%

Table 1.6: Source: 2013-17 American Community Survey (ACS) – U.S. Census

African Americans had significantly higher unemployment rates, compared to Whites and Hispanics.

The unemployment rate among African Americans was 13 percent, Hispanics was 10.3 percent, compared to White persons was 6.4 percent between 2013 and 2017.

Map 1.9 Unemployment Rate

Legend:

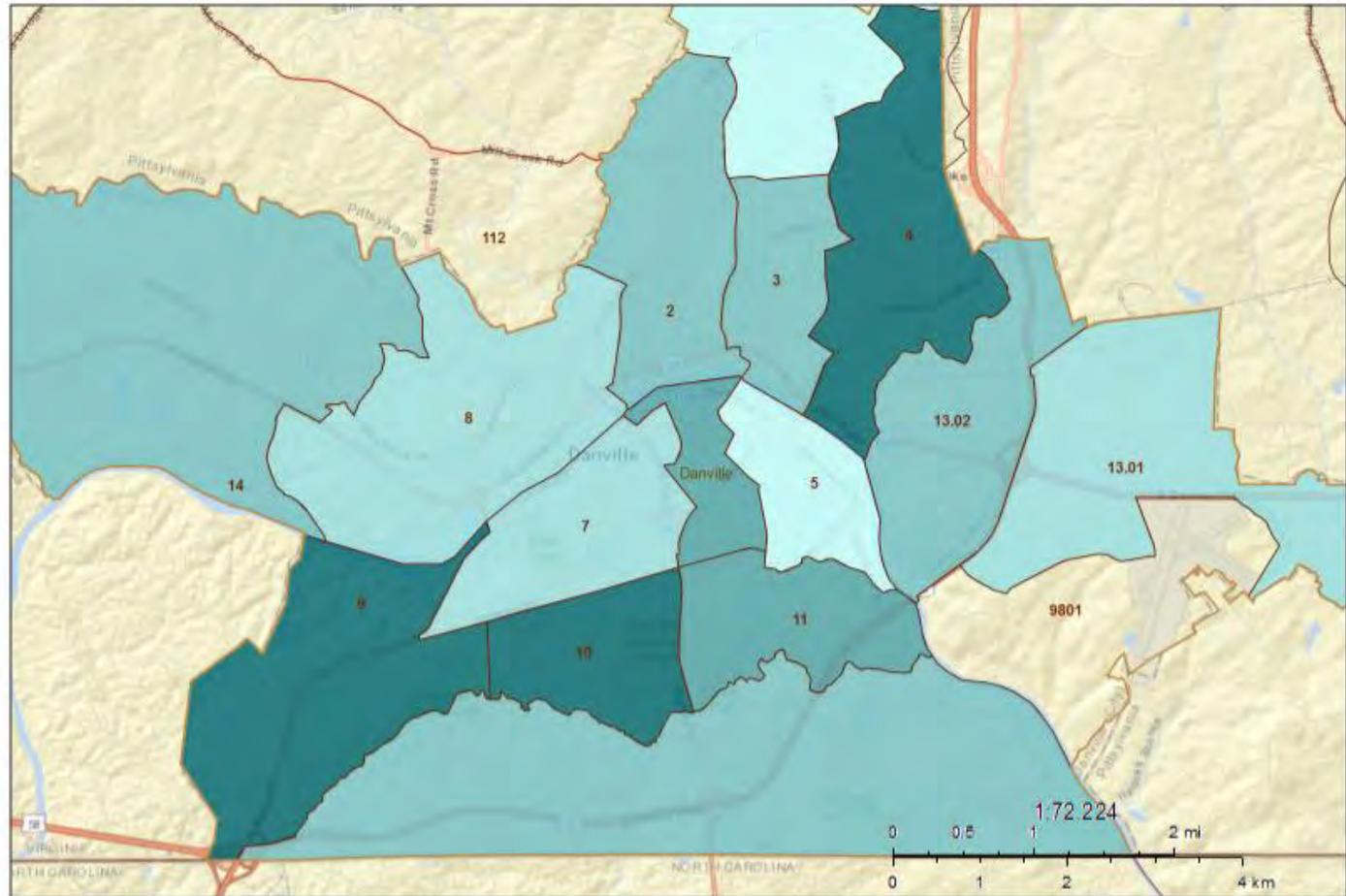
Data Classes

Percent

- 3.0 - 3.8
- 7.3 - 8.3
- 9.0 - 10.9
- 12.6 - 13.5
- 16.3 - 17.8

2017 Boundaries

- Census Tract
- Place



Map 1.9: Source: 2013-17 American Community Survey (ACS) – U.S. Census

According to the major employer data provided by the City of Danville, the largest employers in the city include Goodyear Tire & Rubber Company with 2,499 employees, Danville Regional Medical Center/Stratford Health Center with 1,499 workers, Telvista with 999 workers, and the Danville Community College with 599 workers.

In Danville, the difference in the unemployment rate between the three groups can, to some extent, be attributed to limitations due to educational attainment. According to the 2013 - 2017 ACS estimates (5-year average), 23 percent of African Americans age 25 and above reported less than a high school education compared to 15.8 percent of Whites and 58.5 percent of Hispanics for in the same age group. As a comparison, the percentage of population with less than a high school education in the city was 28.1 percent during the period.

To further examine the impact of employment proximity relative to housing choice for low- and moderate-income persons, we analyzed the use and availability of public transportation. The availability of jobs to low-income persons is largely dependent on the geographic location of the jobs. If jobs are concentrated in largely upper income areas, far removed from lower income persons, their ability to get to and from work may be difficult, sometimes causing hardships on employees or potential employees.

1.4. Public Transportation

The Danville Transit System provides variety of public transportation services such as bus service on fixed routes, Handivan Service, and Reserve a Ride Service. Service hours are from 4:00 am until 12:30 am, Monday through Saturday. The Danville Transit System provides bus service on 11 different fixed routes. The one-way fare is \$1 and one child 12 years old and younger traveling with a paying adult may ride free. A half fare discount is available from 6 am until noon for seniors (60 years or older), disabled individuals, and Medicare cardholders.

Handivan is a paratransit Service for individuals with disabilities who because of their disability are unable to use the fixed route buses. This specialized, door-to-door, demand-response paratransit service is available all weekdays and Saturday from 6 a.m. to 6 p.m. The Reserve A Ride service transports passengers' door to door and operates from 4:00 am until 12:30 am, Monday through Saturday. The one-way fare is \$4.00 for all ambulatory trips within the city limits of Danville, Virginia and the Cane Creek Centre Industrial Park. Trolley buses are used in Reserve A Ride service for large passenger groups of ten or more persons. Disabled persons are also charged the same price, and two children 12 years old and younger traveling with a paying adult may ride free on this service.

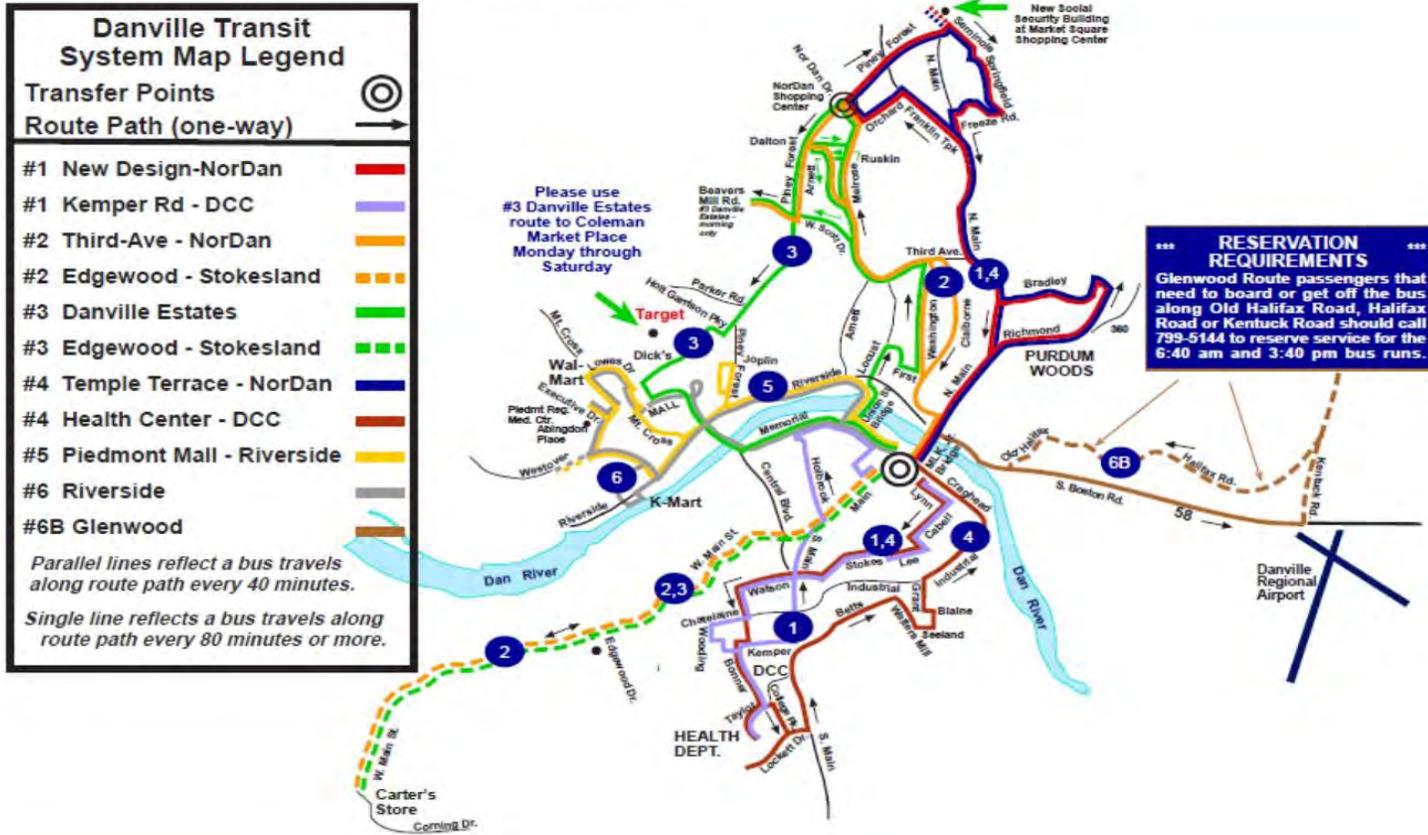
Map 1.10 on the following page illustrates Danville Shuttle bus routes and stops.

The Danville Transit System provides a variety of public transportation services at affordable prices. The public transportation services in the city include bus service on fixed routes, Handivan Service, and Reserve a Ride Service.

Map 1.10: Public Transportation Routes

Danville Analysis of Impediments to Fair Housing Choice

Source: City of Danville, <http://www.danville-va.gov/DocumentCenter/Home/View/3691>



Map 1.10 Source City of Danville

1.5. Housing

According to the 2017 American Community Survey, the total number of housing units in the city was 22,206 with 3,689 or 16.6 percent vacant units. As shown in Table 1.7, to the right, there were 22,587 housing units in Danville in 2010. The total

Table 1.7
Tenure for housing in Danville, 2000,
and 2013-2017 (5-Year Average)

Tenure	2010		2013 - 2017	
	Number	Percent	Number	Percent
Owner-occupied	10,623	47.03%	9,844	44.3%
Renter-occupied	8,825	39.07%	8,673	39.0%
Vacant	3,139	13.90%	3,689	16.6%
Total:	22,587	100.0%	22,206	100.0%

Table 1.7: Source: 2013-17 American Community Survey (ACS) – U.S. Census

number of housing units in the city increased by less than 1 percent between 2010 and 2017. According to the 2013 - 2017 ACS estimates (5-year average), the total number of housing units in the city 22,206 of which, 44.3 percent were owner-occupied, 39.0 percent were renter-occupied, and the remaining 16.6 percent were vacant. The median housing value in the city was \$90,900 and the median contract rent was \$434 between 2013 and 2017.

Table 1.8, to the right, shows that of all housing units, 70.1 percent were categorized as single-family detached, 1.5 percent as single-family attached, 7.7 percent contained two to four units, 17.8 percent classified as multifamily, and 2.9 percent as mobile home or other.

Table 1.8
Housing type for Danville, 2013-2017 (5-Year Average)

Units in Structure	Number	Percent
Single-Family detached	15,577	70.1%
Single-Family attached	333	1.5%
2-4 units	1,716	7.7%
Multifamily	3,946	17.8%
Mobile home or Other	634	2.9%
Total	22,206	100%

Table 1.8: Source: 2013-17 American Community Survey (ACS) – U.S. Census

The Majority of housing stock in Danville was single-family housing, and less than half of housing stock in the city was owner-occupied between 2013 and 2017.

Approximately 70 percent of housing units in the city were single-family, and 46 percent were owner-occupied during that same period.

As shown on Table 1.9, 28.9 percent of all housing units were built prior to 1950, 18.1 percent were built between 1950 and 1959, 17.8 percent were built between 1960 and 1969, 15.8 percent were built between 1970 and 1979, and 19.1 percent were built after 1979. About 80 percent of the housing stock is more than 40 years old, built prior to 1980. These units may contain lead-based paint or likely need repairs and maintenance.

Table 1.9
Age of Housing Stock in Danville, 2013 - 2017 (5-Year Average)

Year Built	#	%
Built 2014 or later	67	0.3%
Built 2010 to 2013	163	0.7%
Built 2000 to 2009	986	4.4%
Built 1990 to 1999	1,531	6.9%
Built 1980 to 1989	1,555	7.0%
Built 1970 to 1979	3,519	15.8%
Built 1960 to 1969	3,950	17.8%
Built 1950 to 1959	4,028	18.1%
Built 1940 to 1949	2,551	11.5%
Built 1939 or earlier	3,856	17.4%
Total:	29,640	100%

Table 1.9: Source: 2013-17 American Community Survey (ACS) – U.S. Census

A Majority of housing stock in Danville was more than 40 years old, and these units may contain lead-based paint or likely need repairs and maintenance.

Approximately 80 percent of the housing stock was built prior to 1970.

According to the 2013 - 2017 ACS data shown in Table 1.10, the homeownership rate among Whites was 69.2 percent, compared to 39.1 percent among African Americans, and 34.0 percent among Hispanics.

Table 1.10
Tenure by Race in Danville, 2014-2017 (5-Year Average)

Tenure by Race	Owner-occupied		Renter-occupied		Total
	#	%	#	%	
White	6,166	69.2%	2,746	30.8%	8,912
African American	3,429	39.1%	5,331	60.9%	8,760
Hispanic	127	34.0%	247	66.0%	374

Table 1.10: Source: 2013-17 American Community Survey (ACS) – U.S. Census

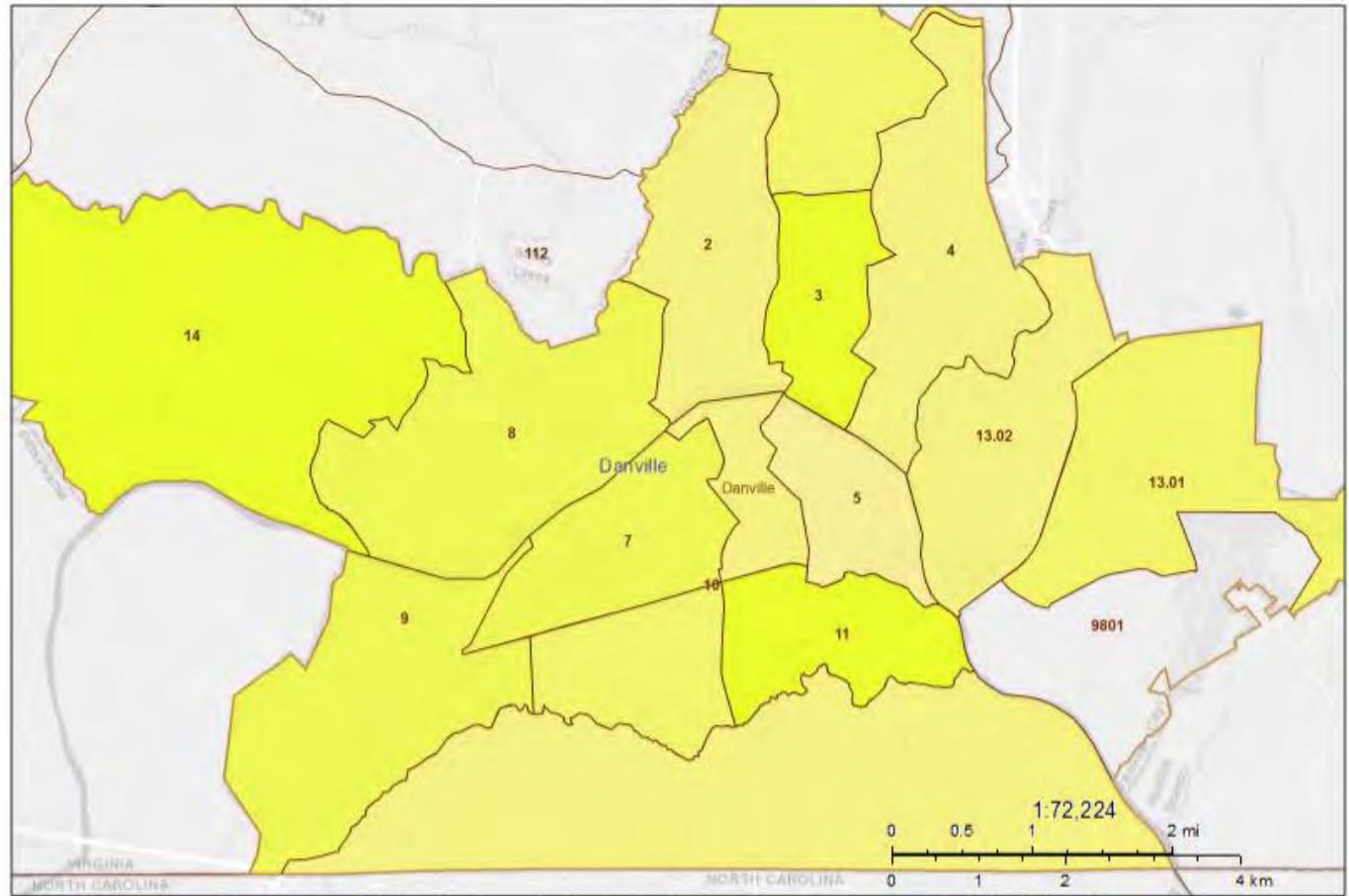
Homeownership rates were disproportionately lower among African Americans and Hispanics, compared to Whites.

The homeownership rate among Whites was 69.2 percent, African Americans were 39.1 percent, and Hispanics was 34.0 percent between 2013 and 2017.

Maps 1.11, on the following page, and Map 1.12, on page 28, indicate the distribution of single-family and multifamily housing across the city. Map 1.13, on page 29, provides a geographic representation of the distribution of the oldest housing stock in the city. Maps 1.14 and 1.15, on pages 30 and 31, provide a geographic depiction of the distribution of housing values and rents across the city.

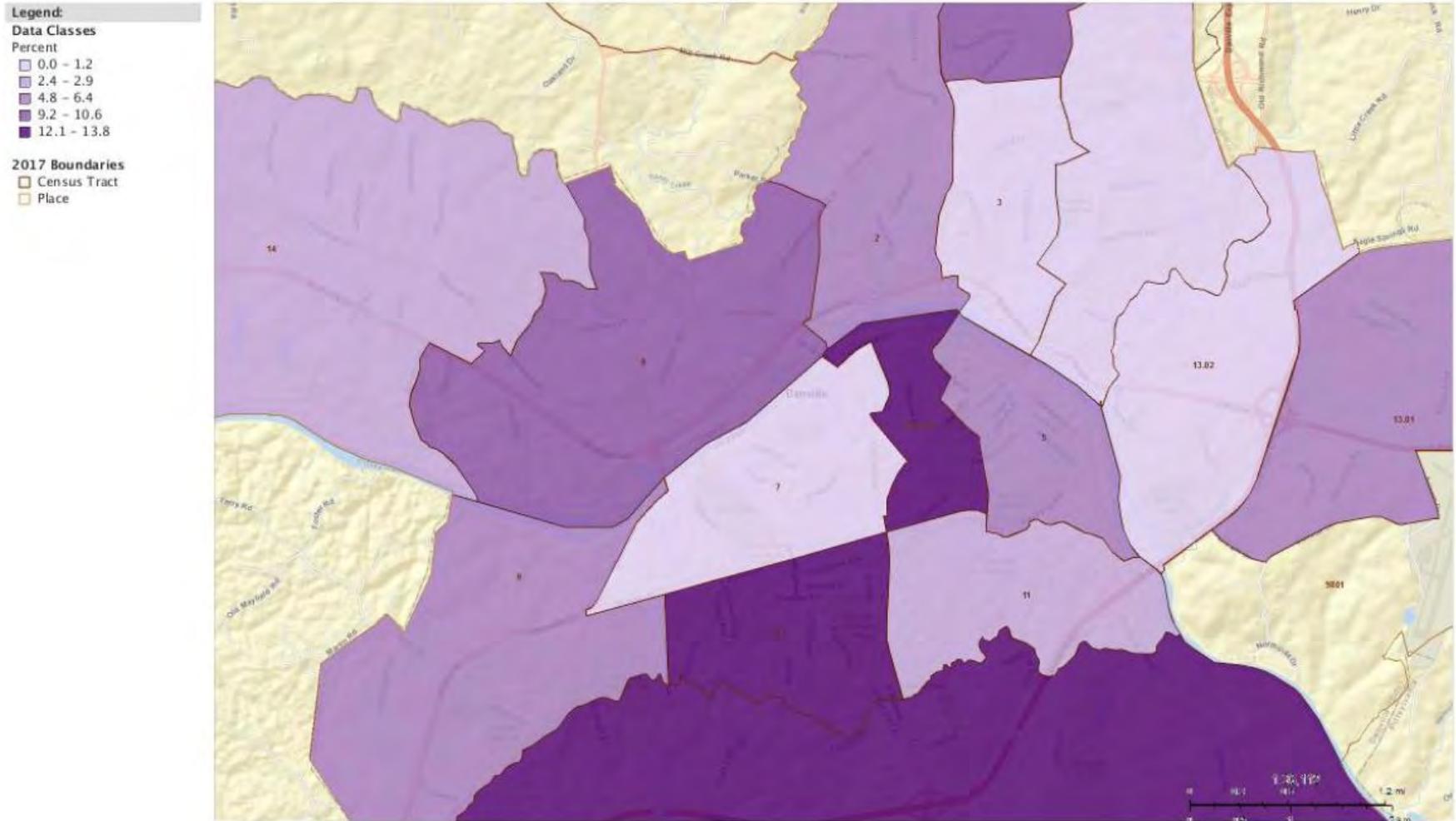
Map 1.11 Percent Single Family Units

- Legend:**
- Data Classes**
Percent
- 35.1 - 35.1
 - 54.5 - 64.5
 - 69.3 - 71.5
 - 75.3 - 79.0
 - 81.7 - 87.1
- 2017 Boundaries**
- Census Tract
 - Place



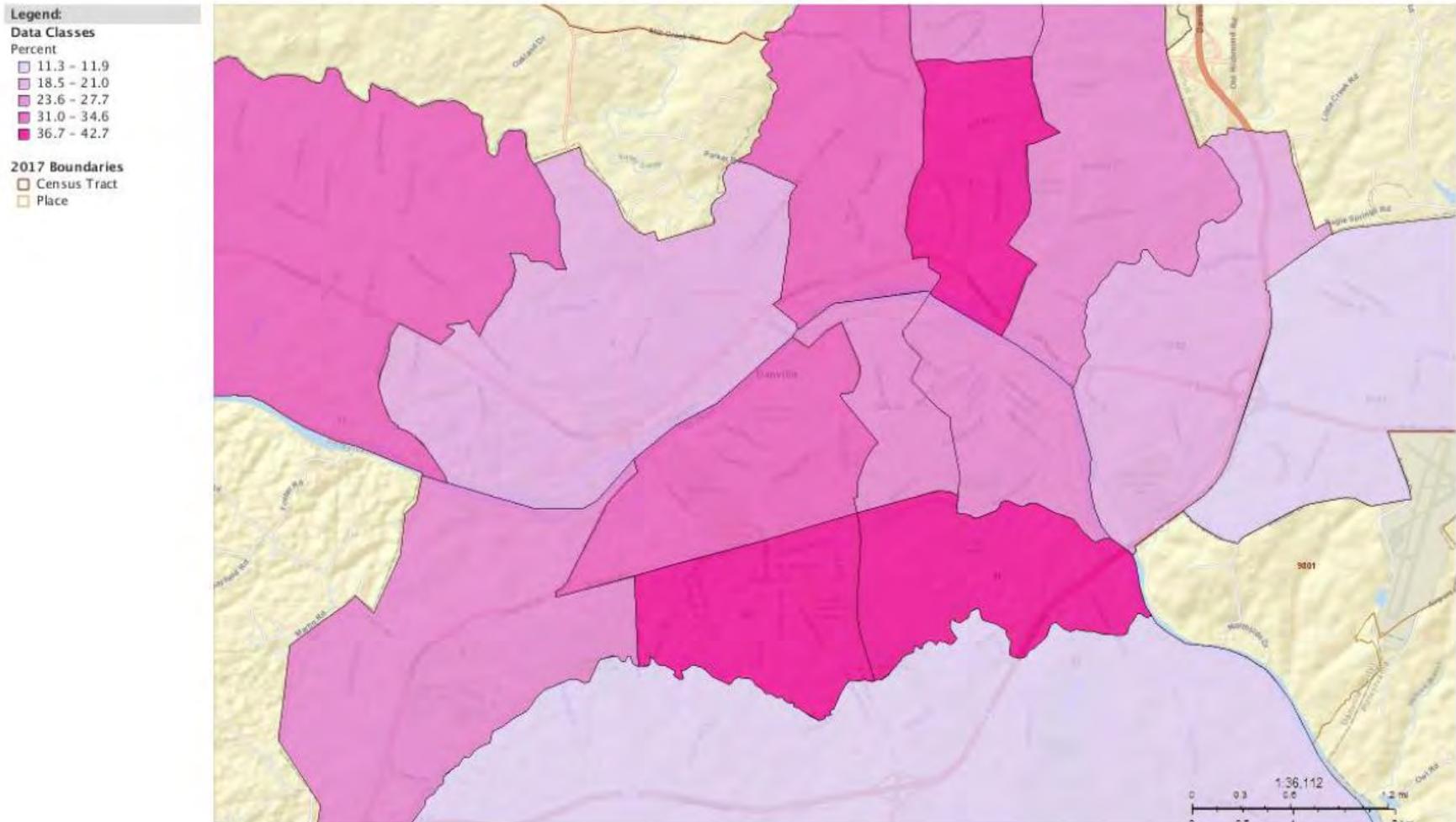
Map 1.11: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.12 Percent Multifamily Units



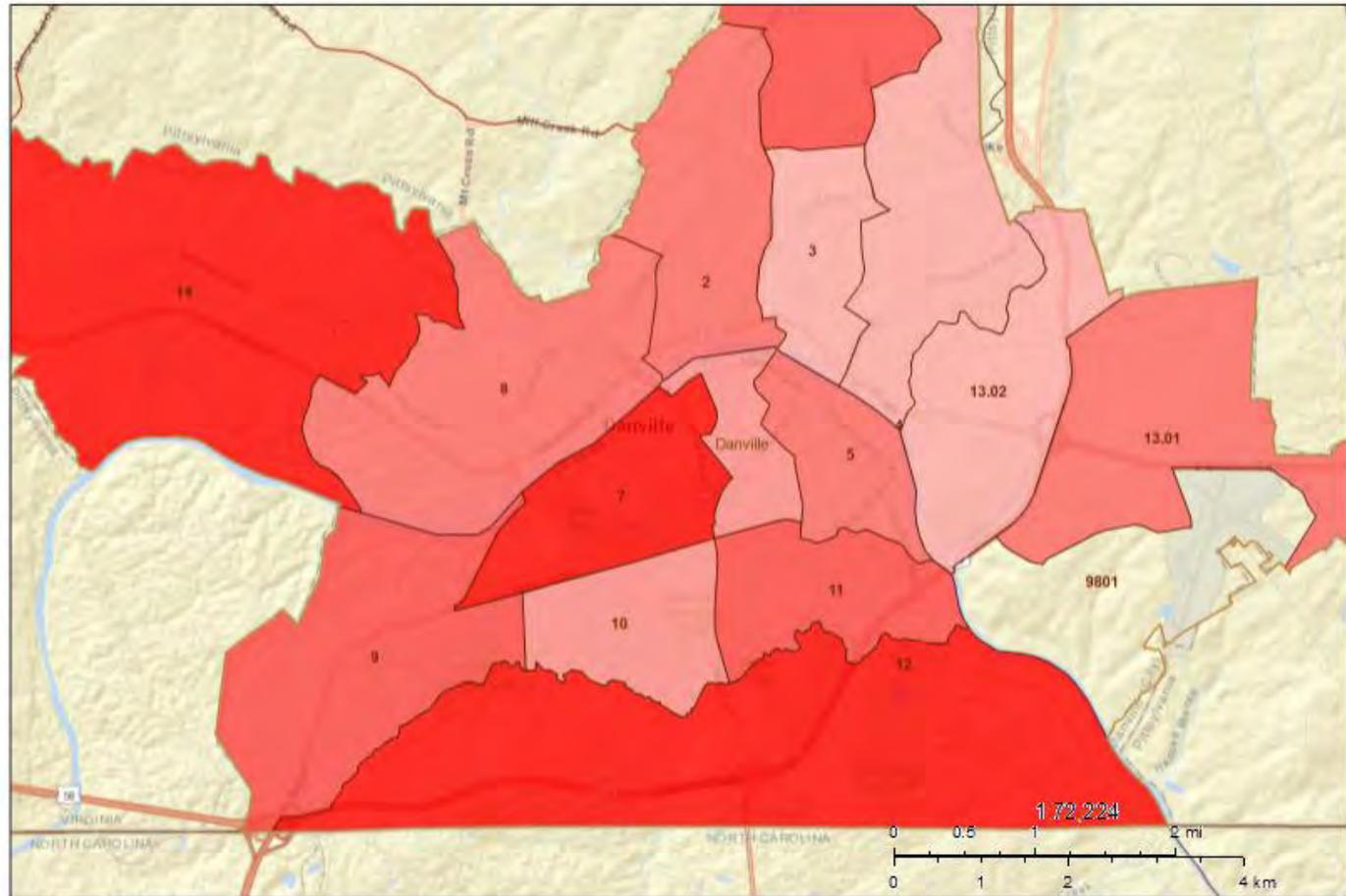
Map 1.12: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.13 Percent Pre-1960 Housing Stock



Map 1.13: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.14 Median Home Value



Map 1.14: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Map 1.15 Median Contract Rent

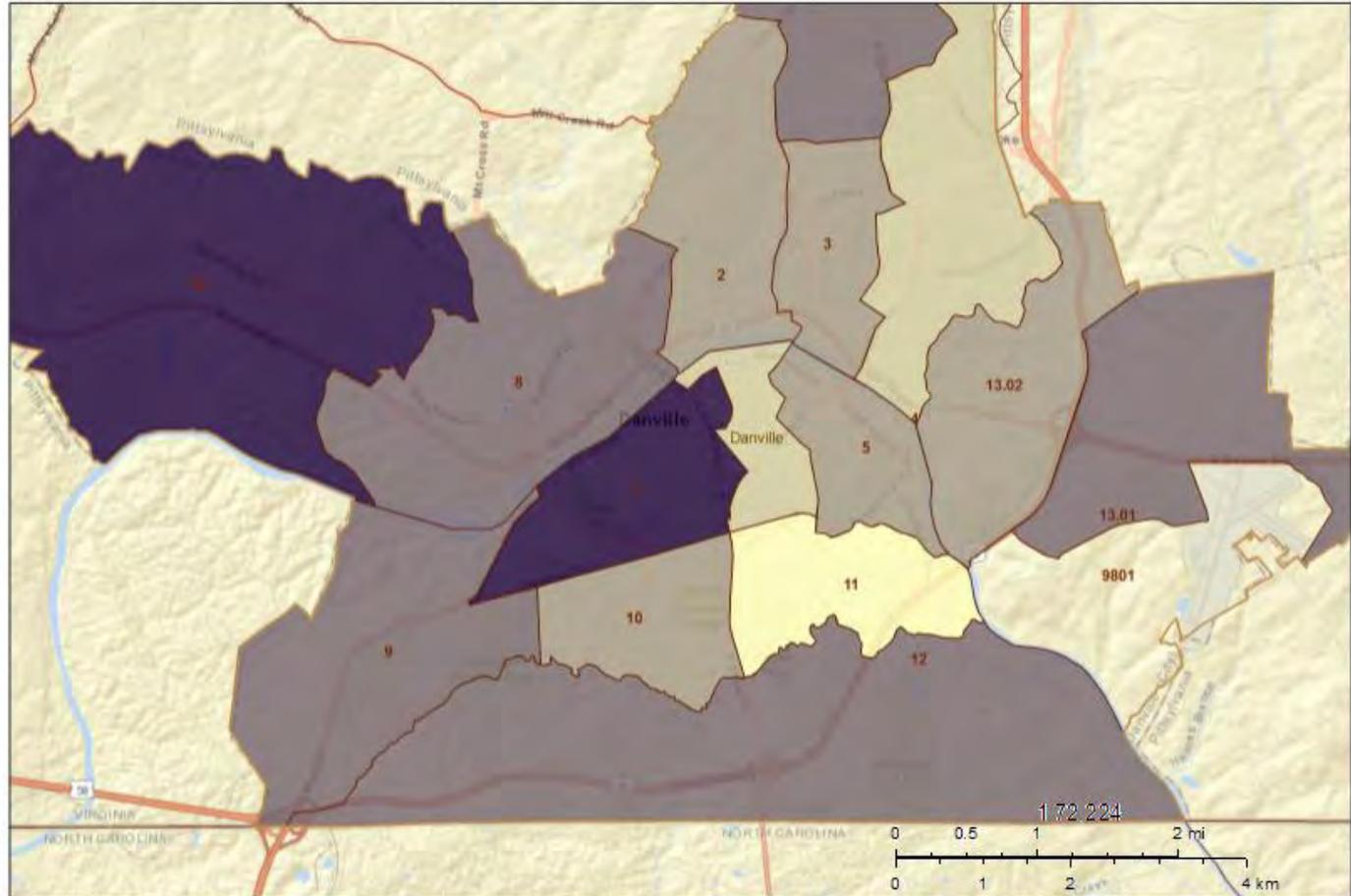
Legend:

Data Classes

- 276 - 276
- 325 - 348
- 385 - 443
- 461 - 495
- 536 - 577

2017 Boundaries

- Census Tract
- Place



Map 1.15: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Data contained in the Comprehensive Housing Affordability Strategy (CHAS) data compiled from American Communities Survey results from 2011 through 2015, duplicated in Table 1.14, on page 32, indicates that the impact of housing costs on household incomes is very severe on low- and very low-income households in Danville. The table indicates that 58.0 percent of all very low-income renters (those earning between 0 percent and 30 percent of the median family income) and 54.9 percent of very low-income homeowner households pay more than 50 percent of their income on housing expenses. Further, about 16 percent more very low-income renters and about 3 percent less very low-income homeowners pay between 30 and 50 percent of their incomes on housing expenses. Paying more than 30 percent on housing expenses is considered “Cost Burdened” and paying more than 50 percent on housing expenses is considered “Severely Cost Burdened”.

Looking at households earning between 31 percent and 50 percent of the median family income, 22.3 percent of low-income renters and 24.3 percent of low-income homeowners pay more than 50 percent on housing expenses. Also, 79 percent of renter households and 21 percent of homeowners are earning less than 30 percent the median family income in Danville. Since 2015, cost burden for homeowners has decreased to 20 percent while cost burden for renters has increased to 43 percent in the same time. Additionally, those with severe cost burden, 9.1 percent are homeowners and 22 percent are renters.

Table 1.11
Cost Burden by income and tenure, 2011 - 2015

Income Distribution Overview	Owner	%	Renter	%	Total
Household Income <= 30% HAMFI	665	20.6%	2,560	79.4%	3,225
Household Income >30% to <=50% HAMFI	1,360	46.0%	1,595	54.0%	2,955
Household Income >50% to <=80% HAMFI	1,760	52.1%	1,615	47.9%	3,375
Household Income >80% to <=100% HAMFI	1,190	60.1%	790	39.9%	1,980
Household Income >100% HAMFI	5,035	71.7%	1,985	28.3%	7,020
Total	10,015	54.0%	8,545	46.0%	18,560
Income by Cost Burden (Owners and Renters)	Cost burden > 30%		Cost burden > 50%		Total
Household Income <= 30% HAMFI	2,345	72.7%	1,850	57.4%	3,225
Household Income >30% to <=50% HAMFI	1,880	63.6%	685	23.2%	2,955
Household Income >50% to <=80% HAMFI	1,015	30.1%	200	5.9%	3,375
Household Income >80% to <=100% HAMFI	265	13.4%	75	3.8%	1,980
Household Income >100% HAMFI	200	2.8%	45	0.6%	7,020
Total	5,705	30.7%	2,855	15.4%	18,560
Income by Cost Burden (Renters only)	Cost burden > 30%		Cost burden > 50%		Total
Household Income <= 30% HAMFI	1,890	73.8%	1,485	58.0%	2,560
Household Income >30% to <=50% HAMFI	1,175	73.7%	355	22.3%	1,595
Household Income >50% to <=80% HAMFI	455	28.2%	55	3.4%	1,615
Household Income >80% to <=100% HAMFI	110	13.9%	45	5.7%	790
Household Income >100% HAMFI	35	1.8%	10	0.5%	1,985
Total	3,665	42.9%	1,950	22.8%	8,545
Income by Cost Burden (Owners only)	Cost burden > 30%		Cost burden > 50%		Total
Household Income <= 30% HAMFI	455	68.4%	365	54.9%	665
Household Income >30% to <=50% HAMFI	705	51.8%	330	24.3%	1,360
Household Income >50% to <=80% HAMFI	565	32.1%	150	8.5%	1,760
Household Income >80% to <=100% HAMFI	155	13.0%	30	2.5%	1,190
Household Income >100% HAMFI	165	3.3%	35	0.7%	5,035
Total	2,045	20.4%	910	9.1%	10,015

Table 1.11 Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Tables, 2011 - 2015

According to the 2013 - 2017 ACS estimates, shown in Table 1.12 to the right, 52.9 percent of renter households paid more than 30 percent of their household income towards rent. Over 73 percent of the renter households with household income of less than \$10,000, 81.3 percent of the renter households that earned between \$10,000 to \$19,999, 51.4 percent of the renter households that earned between \$20,000 to \$34,999, and 11.2 percent of the renter households that earned between \$35,000 to \$49,999 spent more than 30 percent of their households income towards rent during the five-year period.

As shown in Table 1.13, to the right, 11.4 percent of owner households were 30 percent cost burden and 9.3 percent of the owner households were 50 percent cost burden during the same period.

Table 1.12
Gross Rent as a Percent of Household Income in Danville,
2013-2017 (5-Year Average)

Gross Rent as a Percent of Household Income	Number of Households	Cost Burden 30%
Less than \$10,000	1,599	
Less than 30.0 percent	153	
30.0 percent or more	1,176	73.55%
\$10,000 to \$19,999	1,800	
Less than 30.0 percent	300	
30.0 percent or more	1,464	81.33%
\$20,000 to \$34,999	2,294	
Less than 30.0 percent	1,205	
30.0 percent or more	924	51.40%
\$35,000 to \$49,999	1,225	
Less than 30.0 percent	1,101	
30.0 percent or more	96	11.20%
\$50,000 or more	1,755	
Less than 30.0 percent	1,671	
30.0 percent or more	53	2.90%
Total Renter Households	8,673	
Less than 30.0 percent	4,430	
30.0 percent or more	3,713	52.90%

Table 1.12: Source: 2013-17 American Community Survey (ACS) – U.S. Census

Table 1.13
Owner Costs as a Percent of Household Income in Danville,
2013-2017 (5-Year Average)

Housing Cost as a Percent of Household Income	Number of Owner Households	Percent
Less than 30.0 percent	7,683	
30.0 percent or more	1,125	11.43%
50.0 percent or more	909	9.23%
Not computed	127	
Total Owner-Occupied households	9,844	

Table 1.13: Source: 2013-17 American Community Survey (ACS) – U.S. Census

According to the 2013 - 2017 ACS data, 52.9 percent of the renter households in Danville were cost burden paying more than 30 percent of income for housing.

For this same time period, 11 percent owner households paid more than 30 percent of their household income for housing and 9.2 percent of owner households were 50 percent cost burden.

One of the most revealing indicators that minorities are more likely to require rental housing and lag far behind Whites in obtaining housing of their choice is in the category of homeownership. The homeownership rate among Whites was 69 percent, 30 percentage points higher than African Americans at 39 percent, and 35 percentage points higher than that of Hispanics, with a homeownership rate at 34 percent between 2013 and 2017.

Other limitations for minorities include lower incomes, and a disproportionate number of minority households living in poverty. The incidence of poverty among African Americans was 27.8 percent of the total population between 2013 and 2017, and Hispanics was reported to be 13.4 percent. Among White persons, the data reported 12.6 percent lived in poverty. In comparison, the poverty rate for the city was 21.5 percent during the period. The median household income was reported to be \$41,425 for White households, \$29,954 for African American households and \$52,353 for Hispanic households, compared to \$34,951 for the overall city. All of these factors combine limit housing choice of the City's minority populations.

III. Fair Housing Law, Court Cases, Policy, Regulatory and Complaint Analysis

Introduction

It is important to examine how the City of Danville's laws, regulations, policies and procedures will ultimately affect fair housing choice. Fair housing choice is defined, generally, as the ability of people with similar incomes to have similar access to location, availability and quality of housing. Therefore, impediments to fair housing choice may be acts that violate a law or acts or conditions that do not violate a law, but preclude people with varying incomes from having equal access to decent, safe, and affordable housing.

The first part of this section, Section 2.1, will address the existing statutory and case law that work to remove impediments and promote fair housing choice. The Federal Fair Housing Act can be effective in mitigating barriers to fair housing choice, depending upon enforcement efforts. Relevant judicial court case decisions pertaining to fair housing were reviewed and are incorporated in the analysis. Other related regulations and case law that provide further interpretation, understanding, and support to the Federal Fair Housing Act were considered and will also be discussed.

The City of Danville has enacted local fair housing legislation Ordinance Number 91-6-11 adopted June 4, 1991 which is substantially equivalent to Federal Fair Housing Law. Therefore, our analysis of applicable fair housing laws focused on both the Danville Fair Housing Ordinance and State of Virginia Fair Housing Act. In the analysis the State of Virginia statutes were also compared to the Federal Fair Housing Act to determine whether they offered similar rights, remedies, and enforcement to the federal law and might be construed as substantially equivalent. Pertinent related laws, such as the Community Reinvestment Act and Home Mortgage Disclosure Act, were reviewed with respect to how they can facilitate fair lending. Section 2.2 summarizes the level of fair housing enforcement activity in the City of Danville.

A more difficult, but intertwined, aspect of evaluating barriers to fair housing choice involves an analysis of public policy, programs and regulations that impact the availability of affordable housing. Our analysis centered on how governmental actions impact fair housing choice and the availability of adequate, decent, safe, and affordable housing for people of all incomes. We examined government subsidies and public funding appropriations used to provide housing assistance for very low- and low-income households. This included an analysis of City operated Community Development Block Grant (CDBG), and any Home Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) programs operated utilizing federal funding provided in Section 2.3. Numerous documents were collected and analyzed to complete this section. The key documents are Consolidated Plans, current and previous Annual Action Plans, and the Consolidated Annual Performance Evaluation Reports (CAPER); and the Danville Redevelopment Housing Authority (DRHA) Annual Plan, Five Year Plan, Administrative policies and Annual Contributions Contract. City staff also provided information on its current and future initiatives utilizing CDBG funds and other federal grants.

Our analysis of development regulations, City advisory board actions and public policy documents are presented in Section 2.4. This section focuses on building codes, zoning ordinances, land use plans, local initiatives and governmental actions relative to development and incentives that stimulate development. The analysis of public policy includes decisions by Danville City Council and advisory boards and commissions and the Danville Redevelopment Housing Authority Board.

Section 2.5 provides an analysis of fair housing complaints filed with HUD. Section 2.5 also contains conclusions about fair housing barriers based on the existing law, enforcement efforts, complaint analysis, and the availability of affordable housing. The HUD Richmond, Virginia Fair Housing and Equal Opportunity (FHEO) Office has responsibility for fair housing enforcement in Danville. Official compliant date was received from the HUD Regional Office, Fair Housing Equal Opportunity Division.

2.1. Fair Housing Law

The Federal Fair Housing Act (the Act) was enacted in 1968, and amended in 1974 and 1988 to add protected classes, provide additional remedies, and strengthen enforcement. The Act, as amended, makes it unlawful for a person to discriminate on the basis of race, color, sex, religion, national origin, handicap, or familial status. Generally, the Act prohibits discrimination based on one of the previously mentioned protected classes in all residential housing, residential sales, advertising, and residential lending and insurance. Prohibited activities under the Act, as well as examples, are listed below.

It is illegal to do the following based on a person's membership in a protected class:

- Misrepresent that a house or apartment is unavailable by:
 - ✓ Providing false or misleading information about a housing opportunity,
 - ✓ Discouraging a protected class member from applying for a rental unit or making an offer of sale, or
 - ✓ Discouraging or refusing to allow a protected class member to inspect available units;
- Refuse to rent or sell or to negotiate for the rental or sale of a house or apartment or otherwise make unavailable by:
 - ✓ Failing to effectively communicate or process an offer for the sale or rental of a home,
 - ✓ Utilizing all non-minority persons to represent a tenant association in reviewing applications from protected class members, or
 - ✓ Advising prospective renters or buyers that they would not meld with the existing residents;
- Discriminate in the terms, conditions, or facilities for the rental or sale of housing by:
 - ✓ Using different provisions in leases or contracts for sale,
 - ✓ Imposing slower or inferior quality maintenance and repair services,

- ✓ Requiring a security deposit (or higher security deposit) of protected class members, but not for non-class members,
 - ✓ Assigning persons to a specific floor or section of a building, development, or neighborhood, or
 - ✓ Evicting minorities, but not whites, for late payments or poor credit;
- Make, print, publish, or post (direct or implied) statements or advertisements that indicate that housing is not available to members of a protected class;
- Persuade or attempt to persuade people, for profit, to rent or sell their housing due to minority groups moving into the neighborhood by:
 - ✓ Real estate agents mailing notices to homeowners in changing area with a listing of the homes recently sold along with a picture of a Black real estate agent as the successful seller, or
 - ✓ Mailed or telephonic notices that the "neighborhood is changing" and now is a good time to sell, or noting the effect of the changing demographics on property values;
- Deny or make different loan terms for residential loans due to membership in a protected class by:
 - ✓ Using different procedures or criteria to evaluate credit worthiness,
 - ✓ Purchasing or pooling loans so that loans in minority areas are excluded,
 - ✓ Implementing a policy that has the effect of excluding a minority area, or
 - ✓ Applying different procedures (negative impact) for foreclosures on protected class members;
- Deny persons the use of real estate services;
- Intimidate, coerce or interfere; or
- Retaliation against a person for filing a fair housing complaint.

The Fair Housing Act requires housing providers to make reasonable accommodations in rules, policies, practices, and paperwork for persons with disabilities. They must allow reasonable modifications in the property so people with disabilities can live successfully. Due to the volume of questions and complaints surrounding this aspect of

the federal act, in March 2008, the Department of Justice (DOJ) and the Department of Housing and Urban Development (HUD) released a joint statement to technically define the rights and obligation of persons with disabilities and housing providers.

In addition to prohibiting certain discriminatory acts, the Act places no limit on the amount of recovery and imposes substantial fines. The fine for the first offense can be up to \$11,000; the second offense within a five year period, up to \$27,500; and for a third violation within seven years up to \$55,000.

The prohibition in the Fair Housing Act against advertising that indicates any "preference, limitation or discrimination" has been interpreted to apply not just to the wording in an advertisement but to the images and human models shown. Ad campaigns may not limit images to include only or mostly models of a particular race, gender, or family type.

As a test to determine if advertising relative to housing and real estate in the local housing market have impediments to fair housing, a review of local advertisements in real estate publications was conducted. These types of advertisements cover an area larger than just Danville, and the time-period is insufficient to conclusively establish a pattern of discrimination. The data does however provide an accurate snapshot of the advertising available, and a general overview of the state of compliance with fair housing law. The advertising, especially those with images of prospective or current residents was reviewed, with a sensitivity toward:

- Advertising with all or predominately models of a single race, gender, or ethnic group;
- Families or children in ad campaigns depicting images of prospective residents;
- Particular racial groups in service roles (maid, doorman, servant, etc.);
- Particular racial groups in the background or obscured locations;
- Any symbol or photo with strong racial, religious, or ethnic associations;
- Advertising campaigns depicting predominately one racial group;

- Campaigns run over a period of time, including a number of different ads, none or few of which include models of other races;
- Ads failing to contain Equal Housing Opportunity (EHO) statements or logos, or contains the statement or logo, but it is not readily visible; and
- Ad campaigns involving group shots or drawings depicting many people, all or almost all of whom are from one racial group.

Publications advertising the sale or rental of housing directed toward persons in the greater Danville area were reviewed including Apartment Finder, The Real Estate Book, and various local real estate sales publications. There were no major concerns revealed. Some publications made blanket statements at the front of the publication stating that the magazines as well as their advertisers are subject to the Federal Fair Housing Act. Most of the advertisers advertise with the equal housing opportunity logo or slogan. Including the logo helps educate the home seeking public that the property is available to all persons. A failure to display the symbol or slogan may become evidence of discrimination if a complaint is filed. Additionally, most of the images included in the selected materials either represented racial, ethnic or gender diversity among the models selected.

Fair Housing Assistance Program (FHAP) Agencies

The U. S. Department of Housing and Urban Development (HUD) provides funding to state and local governmental agencies to enforce local fair housing laws that are substantially equivalent to the Fair Housing Act. Once a state and a city or county in that state have a substantially equivalent fair housing law, they can apply to become certified as a Fair Housing Assistance Program (FHAP) Agency and receive funds for investigating and conciliating fair housing complaints or a Fair Housing Initiatives Program (FHIP) Agency and receive funds for education, promoting fair housing, and investigating allegations. It should be noted that a county or city must be located in a state with a fair housing law that has been determined by HUD to be substantially equivalent. Then, the local jurisdiction must also adopt a law that HUD concludes is

substantially equivalent in order to participate in the FHAP Program. The local law must contain the seven protected classes - race, color, national origin, sex, religion, handicap, and familial status - and must have substantially equivalent violations, remedies, investigative processes, and enforcement powers.

In addition, the process for investigating and conciliating complaints must mirror HUD's. HUD's process begins when an aggrieved person files a complaint within one year of the date of the alleged discriminatory housing or lending practice. The complaint must be submitted to HUD in writing. However, this process can be initiated by a phone call. HUD will complete a complaint form, also known as a 903, and mail it to the complainant to sign. The complaint must contain the name and address of the complainant and respondent, address and description of the housing involved, and a concise statement of the facts, including the date of the occurrence, and the complainant's affirmed signature. Upon filing, HUD is obligated to investigate, attempt conciliation, and resolve the case within 100 days. Resolution can be a dismissal, withdrawal, settlement or conciliation, or a determination as to cause.

The FHAP certification process includes a two-year interim period when HUD closely monitors the intake and investigative process of the governmental entity applying for substantial equivalency certification. Also, the local law must provide enforcement for aggrieved citizens where cause is found. It can be through an administrative hearing process or filing suit on behalf of the aggrieved complainant in court. The FHAP certification process is contingent on the type of funding for which the agency is applying. There are four programs to which an agency can apply; Fair Housing Organizations Initiative (FHOI), Private Enforcement Initiative (PEI), Education Outreach Initiative (EOI), and Administrative Enforcement Initiative (AEI). Currently, there is no funding under the AEI status.

Court Decisions

The impact of Landmark Cases and other significant Court Cases were reviewed to examine how court litigation and settlements might be impacting interpretation of Fair Housing Law. The following summarizes some of the key cases that provide responses to Fair Housing issues and solutions and remedial actions for resolving those issues.

Texas Department of Housing and Community Affairs v. Inclusive Communities Project Inc. is the first case to affirm disparate impact must be considered in determining violations to the 1968 Fair Housing Act. On June 25, 2015, the U.S. Supreme Court, in a 5-4 decision written by Justice Kennedy, upheld the disparate impact doctrine under the Fair Housing Act. This precedent-setting opinion affirmed both 40 years of legal jurisprudence and the decisions of 11 U.S. appellate courts in holding that disparate impact is cognizable under the Fair Housing Act.

The Court acknowledges the Fair Housing Act's continuing role in moving the Nation toward a more integrated society. The Court affirmed that disparate impact is an important protection for all of us. This also affirms that those protected under the 1968 Fair Housing Act, individuals and families, and their right to housing, cannot be restricted because they have children, women who experience domestic violence cannot suffer eviction just because they suffered abuse or their previous address is a shelter, and communities of color can live with the security of knowing that the predatory lending practices that dumped millions of subprime loans into their neighborhoods will not be allowed. Neighborhoods still trying to recover from the financial crisis can have hope because disparate impact is an important tool in addressing unfair practices that contribute to economic and wealth disparities. Where we live makes

Walker v. HUD represents a landmark case, settled by consent decree, and establishing precedent as to HUD, PHA and City responsibilities and culpability for

insuring the elimination of segregation in public and assisted housing. - The **Walker** public housing/Section 8 desegregation litigation began in 1985 when one plaintiff, Debra Walker, sued one Dallas, Texas area suburb, Mesquite. The lawsuit contended that Mesquite's refusal to give its consent for DHA to administer Section 8 certificates within Mesquite violated the 14th Amendment and the other civil rights law prohibiting racial discrimination in housing. The early stage of **Walker** resulted in the entry of the 1987 consent decree involving DHA and HUD without any liability findings. The suit was subsequently amended to bring in DHA, HUD, and the City of Dallas and to provide for a class of Black public housing and Section 8 participants who contended that the Dallas Housing Authority segregated person in public housing by race leading to racial concentrations of African Americans in minority concentrated areas. The suburbs, with the exception of Garland, gave their consent to the operation of DHA's Section 8 program within their jurisdiction and were dismissed from the case. The City of Dallas was subsequently found liable for its role in the segregation of DHA's programs in the Court's 1989 decision, **Walker III**, 734 F. Supp. 1289 (N.D. Tex. 1989).

HUD and DHA were subsequently found liable for knowingly and willingly perpetuating and maintaining racial segregation in DHA's low income housing programs. HUD was found liable not just for its failure to affirmatively further fair housing under the Fair Housing Act but also for purposeful violations of the Fifth Amendment to the U.S. Constitution, Title VI of the 1964 Civil Rights Act, 42 U.S.C. §§ 1981, 1982, and 1983. The district court found that the defendants had the remedial obligation to not only cease any present discrimination but to also eliminate the lingering effects of past segregation to the extent practical.

Court orders entered in this case have provided the following desegregation resources:

- (a) approximately 9,900 new assisted units have been made available to **Walker** class members.
- (b) Approximately \$22 million was made available for the creation of housing opportunities in predominantly white areas of the Dallas metroplex.

(c) \$2 million was provided for the operation of a fair housing organization that focused on the problems of low income minority families.

(d) Hope VI funding for 950 units in the West Dallas project.

(e) \$94 million was provided by the City of Dallas for neighborhood equalization and economic development in the public housing project neighborhoods.

(f) \$10 million was provided for mobility counseling to be used in connection with the Settlement Voucher program.

Similar to the Walker case, Young v. HUD represents a landmark case, settled by consent decree, and establishing precedent as to HUD, PHA and City responsibilities and culpability for insuring the elimination of segregation in public and assisted housing. The Young case involved 70 plus housing authorities in 36 counties in East Texas, HUD, and the State of Texas. The litigation did not end until 2004. The remedy involved the equalization of conditions including the provision of air conditioning in the segregated black projects, desegregation of the tenant population in previously segregated black and white projects, use of the public housing and Section 8 programs and funding for a private fair housing organization to provide over 5,000 desegregated housing opportunities in predominantly white areas, equalization of neighborhood conditions around the predominantly black projects, injunctions against local cities blocking the development of public housing in white neighborhoods, sale of the Vidor public housing and the use of the proceeds for housing opportunities in white areas that were accessible by black public housing tenants, and \$13 million in State funding for neighborhood equalization. Most of the relief was obtained only after the record of HUD's violations of previous remedial orders was compiled and presented to the Court.

Some of the orders, agreements, and reports from this case that are attached are:

A. The final judgment that was entered by the Court in 1995,

B. The order modifying final judgment entered in 2004. This order includes a HUD manual on creating desegregated housing opportunities as exhibit 3 to the order,

C. The agreement between the plaintiffs and the State of Texas for the last \$4.4 million of the total \$13 million that the State contributed to the neighborhood equalization activities required by the Final Judgment.

At the inception of the Fair Housing Act, insurance companies took the position that they were not covered by the Act. However, in 1992 a Wisconsin Appeals Court determined that the Act “applies to discriminatory denials of insurance and discriminatory pricing that effectively preclude ownership of housing because of the race of an applicant.” The case was a class action lawsuit brought by eight African-American property owners, the NAACP, and the American Civil Liberties Union against the American Family Insurance Company. The plaintiffs claimed they were either denied insurance, underinsured, or their claims were more closely scrutinized than Whites. American Family’s contention was that the Act was never intended to prohibit insurance redlining. The appeals Court stated, “Lenders require their borrowers to secure property insurance. No insurance, no loan; no loan, no house; lack of insurance thus makes housing unavailable.” A 1998 court verdict against Nationwide Insurance further reinforced previous court action with a \$100 million judgment due to illegally discriminating against black homeowners and predominantly black neighborhoods.

Another case was settled for \$250,000 in Maryland when Baltimore Neighbors, Inc., a non-profit organization, alleged that real estate agents were steering. Fine Homes’ real estate agents were accused of steering prospective African-American buyers away from predominantly White neighborhoods and Whites were almost never shown homes in predominantly African-American zip codes.

In 2009 a landmark housing discrimination case was settled between the Connecticut Fair Housing Center and the New Horizons Village Apartments. In this case, the State

of Connecticut Office of Protection and Advocacy for Person with Disabilities sued New Horizons Village, an apartment complex which provides independent housing for people with severe physical disabilities. Under the consent decree, New Horizons will no longer be allowed to require tenants to open their private medical records for review and require them to prove they can “live independently”. CT Fair Housing Center stated “The Fair Housing Act is clear that it is impermissible to limit the housing choices of people with disabilities based on stereotypes about their ability to care for themselves; people with disabilities are entitled to the same freedom to choose how and where they want to live as people without disabilities.”

In *County of Edmonds v. Oxford House*, the United States Supreme Court ruled that the Fair Housing Amendments Act of 1988 prevents communities from excluding group homes for the handicapped from single-family residential zones. The Oxford House is a nonprofit umbrella organization with hundreds of privately operated group homes throughout the country that house recovering alcoholics and drug addicts. Recovering alcoholics and drug addicts, in the absence of current drug use or alcohol consumption, are included under the protected class of handicapped in the Fair Housing Act as amended in 1988. In *Oxford House v. Township of Cherry Hill*, 799 F. Supp. 450 (D. N.J. 1991), the federal court rejected a state court ruling that recovering alcoholic and drug addicted residents in a group home do not constitute a single-family under the Township’s zoning ordinance. In *Oxford House-Evergreen v. County of Plainfield*, 769 F. Supp. 1329 (D. N.J. 1991) the court ruled that the county’s conduct, first announcing that the Oxford House was a permitted use only to deny it as a permitted use after neighborhood opposition, was intentionally discriminatory.

“Unjustified institutionalization of persons with mental disabilities...qualifies as discrimination.”- was stated as the majority opinion of the U.S. Supreme Court. In a landmark decision by a 6-3 vote, the U.S. Supreme Court ruled in June 1999, that a state may not discriminate against psychiatric patients by keeping them in hospitals instead of community homes. The court said that the Americans with Disabilities Act (ADA) may require that states provide treatment in community-based programs rather

than in a segregated setting. This case, known as the Olmstead case, ruled that community placement is a must when deemed appropriate by state professionals, agreed to by the individual with the disability, and resources available are sufficient. The courts agreed with “the most integrated setting” provision of the ADA.

In a historic federal settlement order to resolve a lawsuit brought by the Anti-Discrimination Center (ADC) against Westchester County, NY. Westchester County conducted its own Analysis of Impediment to Fair Housing and did not examine race and its effects on housing choice. Only income was studied from a demographic perspective. Westchester did not believe that racial segregation and discrimination were the most challenging impediments in the County. ADC filed lawsuit against Westchester stating that the entitlement is not taking appropriate steps to identify and overcome impediments of fair housing. The Court stated that grant recipients must consider impediments erected by race discrimination, and if such impediments exist, it must take appropriate action to overcome the effects of the impediments. The settlement order issued in August 2009 found that Westchester had “utterly failed” to meet its affirmatively furthering fair housing obligations throughout a six-year period. All entitlements receiving federal funds must certify that they have and will “affirmatively further fair housing.” Because of the tie to federal funds, a false certification can be seen as fraudulent intent. Westchester was ordered to submit an implementation plan of how it planned to achieve the order’s desegregation goals. One major outcome from the landmark agreement is the construction of 750 units of affordable housing in neighborhoods with small minority populations.

In 2003, a settlement was ordered by the District Court in New Jersey for the owner of the internet website, www.sublet.com, who was found guilty of publishing discriminatory rental advertisements which is prohibited by the Fair Housing Act. It was the first of its kind to be brought by the Justice Department. It was thought to be imperative that the federal laws that prohibit discriminatory advertising should be enforced with the same vigor with regard to internet advertising as it would for print and broadcast media. The

court ordered the site to establish a \$10,000 victim fund to compensate individuals injured by the discrimination. They were also ordered to pay a civil penalty of \$5,000, adopt a non-discrimination policy to be published on the website, and require all employees to undergo training on the new practices.

Under the Fair Housing Act, apartment complexes and condominiums with four or more units and no elevator, built for first occupancy after March 13, 1991, must include accessible common and public use areas in all ground-floor units. An apartment complex near Rochester, New York was ordered to pay \$300,000 to persons with disabilities for not making its housing facility fully accessible, with \$75,000 set aside for the plaintiffs. They were required to publish a public notice of the settlement fund for possible victims and pay a \$3,000 civil penalty.

In 2005, the Connecticut Commission on Human Rights and Opportunities (CHRO) issued a charge of discrimination on the basis of disability when an apartment manager refused to rent to a person with a disability on the first floor of the complex due to the absence of access ramp. The apartment manager was unwilling to make a modification to add a ramp. The court recognized that the renter has a disability and the defendant knew the fact and refused to make accommodations. The court concluded that the renter was entitled to compensatory and emotional distress damages of \$10,000 and imposed a civil penalty of \$1,000.

In 2007, the 9th Circuit Court of Appeals gave a decision in support of Fair Housing Council of San Fernando Valley that Roommates.com has violated the fair housing laws by matching roommates by gender, sexual orientation, and parenthood. By asking prospective roommates to put in their status on these criteria and allowing prospective roommates to judge them on that basis is a violation of Fair Housing Act.

In 2005, the National Association for the Advancement of Colored People (NAACP), The National Association of Home Builders (NAHB), and the Home Builders Association (HBA) of Greater Austin, filed a federal lawsuit against the County of Kyle,

Texas. The plaintiffs contended that ordinances passed by the Kyle County Council, imposing requirements such as all-masonry construction, expanded home size, and expanded garage size, drive up the cost of starter homes by over \$38,000 per new unit. The allegation is that this increase has a disproportionate impact on minorities and this effect violates the Fair Housing Act. The County of Kyle filed a motion to dismiss, asserting that both NAACP and NAHB lack standing. The federal district court recognized the plaintiff's standing in 2006. Thereafter, the cities of Manor, Round Rock, Pflugerville, and Jonestown, all moved to join the litigation on the grounds that they each have ordinances similar to the one being challenged in Kyle and that any positive decision in this case would allow NAHB and NAACP to sue them at some later date. In May the court decided that the cities could participate as friends of the court but may not join in the litigation otherwise. This case is pending appeal.

Homelessness and the Fair Housing Act

Homelessness is defined as lacking a fixed, regular, and adequate night-time residence; or where the primary night-time residence is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
- An institution that provides temporary residence for individuals intended to be institutionalized; or,
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

The Fair Housing Act's definition of "dwelling" does not include overnight or temporary residence, so mistreatment of the homeless is not generally covered by Fair Housing Law. The ability of persons to find affordable housing is a protected right of Fair Housing; therefore the inability of people to find affordable housing which may lead to homelessness, is in conflict with the Fair Housing Law.

Unfair Lending Practices

Unfair lending practices are more difficult to detect and to prove. However, there are laws, other than the fair housing law, to assist communities in aggressively scrutinizing fair lending activity. One such law is the Home Mortgage Disclosure Act (HMDA), which requires banks to publish a record of their lending activities annually. Frequently, fair housing enforcement agencies and nonprofits use this data to help substantiate a discrimination claim or to determine a bank's racial diversification in lending. Another law frequently utilized by community organizations is the Community Reinvestment Act (CRA). When a bank wants to merge with or buy another bank or establish a new branch, the community has an opportunity to comment. Usually, the CRA commitments made by the bank are analyzed, utilizing other data such as HMDA, to determine adherence. The community can challenge the action if the bank has a poor record. Sometimes agreements can be reached with the bank promising a certain level of commitment to the community. Additionally, the Equal Credit Opportunity Act (ECOA) prohibits discrimination in lending generally and can be quite significant when it comes to securing information about unfair lending practices and imposing remedies, which may include up to one percent of the gross assets of the lending institution.

The U.S. Supreme Court ruled in June 2009 that states may investigate national banks to determine if they have discriminated against minorities seeking home loans. Furthermore states may charge accused violators if found guilty. The new legislation stemmed from a discrimination investigation of national banks by the New York attorney general. The federal Office of the Comptroller of the Currency (OCC) sought legal

action through the courts to stop the attorney general's investigation because legal principals suggested that only federal regulators can require national banks to conform to regulations and practices that discourages unfair lending. The Supreme Court overturned this ruling giving state government power to enforce consumer-protection and lending policies.

2.2. Enforcement

It has long been settled that fair housing testing is legal and that non-profits have standing to sue so long as certain criteria are met. These decisions make it feasible for non-profits to engage in fair housing enforcement activities.

The Department of Housing and Urban Development enforces federal fair housing laws which prohibit discrimination in the buying, selling, rental or enjoyment of housing because of race, color, national origin, religion, sex, disability or familial status. The HUD FHEO Regional Office in Philadelphia, Pennsylvania and Richmond, Virginia Field Office are responsible for investigations of fair housing complaints that are reported directly to their office. Danville, Virginia is part of the HUD Region III that includes the District of Columbia, Maryland, Virginia, and Pennsylvania. When the HUD Regional Office investigates complaints of discrimination, an investigator generally spends time in the jurisdiction, on-site, interviewing the complainant, respondents, and witnesses, reviewing records and documentation, while observing the environment. A detailed discussion of the complaints filed with HUD follows in Section 2.5. When a complaint is filed with any of the jurisdictions, HUD is notified of the complaint. HUD will notify the violator of the complaint and permit all parties involved an opportunity to submit an answer. HUD will conduct investigations of the complaint to determine whether there is reasonable cause to believe the Federal Fair Housing Act has been violated. The complainant is then notified. A detailed discussion of the complaints filed with HUD follows in Section 2.5. A case is typically heard in an Administrative Hearing unless one party wants the case to be heard in Federal District Court.

Education and Outreach

The City of Danville Community Development Department's (CDD) Fair Housing Officer directs fair housing complaints to and makes referrals to HUD for enforcement. The CDD Staff is also responsible for conducting public education, training and outreach of fair housing rights in Danville. Education of the public regarding the rights and responsibilities afforded by fair housing law is an essential ingredient of fair housing enforcement. This includes outreach and education to the general public, landlords and tenants, housing and financial providers, as well as citizens, concerning fair housing and discrimination. It is important that potential victims and violators of housing and/or lending discrimination law be aware of fair housing issues generally, know what may constitute a violation, and what they can do in the event they believe they have been discriminated against. Likewise, it is important for lenders, housing providers, and their agents to know their responsibilities and when they may be violating fair housing law.

Often, people may be unaware of their fair housing rights. Present day housing discrimination tends to be subtle. Instead of saying that no children are allowed, they may impose unreasonable occupancy standards that have the effect of excluding families with children. Rather than saying, "We do not rent to Hispanics," they may say, "Sorry we do not have any vacancies right now, try again in a few months," when, in fact, they do have one or more vacancies. Printed advertisements do not have to state, "no families with children or minorities allowed" to be discriminatory. A series of ads run over an extended period of time that always or consistently exclude children or minorities may very well be discriminatory. In addition, a person who believes he/she may have been discriminated against will probably do nothing if he/she does not realize that a simple telephone call can initiate intervention and a resolution on his/her behalf, without the expenditure of funds or excessive time. Thus, knowledge of available resources and assistance is a critical component.

2.3. Production and Availability of Affordable Units / CDBG Grant Administration

An assessment of characteristics affecting housing production, availability, and affordability in Danville and utilization of Federal Entitlement Grant funding was conducted, including the adequacy and effectiveness of programs designed and implemented utilizing CDBG and HOME Entitlement funding by the City of Danville. The assessment evaluated the programs' ability to reach their target markets and how effective they are in identifying and serving those who have the greatest need. We also assessed the extent to which the agencies prioritized funding and utilized programs to address impediments identified in the City's Fair Housing Impediment Analysis conducted prior to FY 2015. The City of Danville's Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report, and other documentation were utilized.

2.4. Regulatory and Public Policy Review

The City of Danville has enacted substantially equivalent fair housing law. City of Danville Ordinance Number 91-6-11, adopted June 4, 1991 provides substantially equivalent protections to the seven protected classes under the Federal Fair Housing Act and also includes "elderliness" as an eight protected class. Having a local fair ordinance, especially one that is substantially equivalent to the federal Fair Housing Act, exemplifies a jurisdiction's local commitment to enforcing fair housing regulations and it provides public awareness of individuals' rights under the Fair Housing Act.

The city zoning ordinance, development code and public policies were examined to reveal any current ordinances or policies that impede fair housing choice. Danville's land development codes and zoning regulations address affordable housing and the provision of making allowances through the code to allow the construction of a variety of types of housing including single family and multifamily housing. The regulations provide for the consideration of variances to development barriers that affect the feasibility of producing housing within the jurisdictions. Regulations allow up to 8 unrelated persons to reside in a single family structure by right without specific use or

conditional use permits and has adequate provisions for group homes and special needs populations. While the codes appropriately allow for multifamily zoning, there are a limited number of parcels zoned and available for new multifamily development.

2.5. Analysis of Fair Housing Complaints

Fair housing complaint information maintained by the U.S. Department of HUD providing a breakdown of complaints filed for Danville was considered in determining impacts on fair housing from March 2015 through April, 2019. HUD enforcement data indicated that only six complaints were filed according to one or more of seven bases, including; National Origin, Color, Religion, Familial Status, Handicap, Sex, and Race.

Table 2.5.1 and 2.5.2 normally depict how complaint cases are divided on a protected class basis if complaints had been received. The tables do not contain data, reflecting very few cases were reported and therefore not a significant determinant in evaluating fair housing impacts. Our conclusions reflect a basis for recommending increased fair housing outreach and education programs to ensure that the protected class members, public and industry understand what constitutes a violation of the Fair Housing Act and where they can report violations.

Table: 2.5.1: Fair Housing Complaints by the Basis of Complaint December 1, 2014 – December 31, 2018

Protected Class	Race/ Color	National Origin	Familial Status	Handicap Disability	Sex	Religion	Totals
2014							
2015							
2016							
2017							
2018							
Total							

Source: U.S. Department of Housing and Urban Development – Richmond, Virginia Office

Table: 2.5.2: Type of Case Closure (2014 - 2018)

Type of Closure			2014	2015	2016	2017	2018	Total
Cases remain open								
Case Conciliated / FHAP Judicial Consent Order								
No Probable Cause / FHAP Judicial Dismissal								
Withdrawn/No Action Taken								
Unable to Locate Complainant / Complainant failed to cooperate								
Lack of Jurisdiction/Administrative								
Totals								

Source: U.S. Department of Housing and Urban Development – Philadelphia, Pennsylvania Regional Office

2.6. Conclusions and Implications for Fair Housing Barriers and Impediments

The City of Danville and the State of Virginia has enacted fair housing law that is substantially equivalent to the Federal Fair Housing Act. The City of Danville Community Development Department Staff provides referral of fair housing complaints to HUD for investigation and enforcement and is responsible for conducting public education, training and outreach of fair housing rights in Danville.

Real estate related publications advertising the sale or rental of housing and advertising home improvements and remodeling, directed toward persons in the greater Danville area were reviewed. Some publications made blanket statements at the front of the publication stating that the magazines as well as their advertisers are subject to the Federal Fair Housing Act. Some advertiser included EHO statements and/or logos. Including these logos can be a means of educating the home seeking public that the property is available to all persons.

Annual Action Plans submitted to HUD indicated that the City of Danville operated Entitlement Programs consistent with Federal Regulations and addressing priority needs of both the Consolidated Plan and Fair Housing Impediment Analysis.

The city zoning ordinance building codes and public policies were examined to reveal any current ordinances or policies that impede fair housing. No concerns were noted as a result, however while the codes appropriately allow for multifamily zoning, there is a limited number of parcels zoned and available for new multifamily development.

IV. Community Engagement

Introduction

This section will report on the results from three Fair Housing Focus Group sessions held on May 28th and 29th, 2019 at the City of Danville City Hall Building, 427 Patton Street, Danville, Virginia 24541. Supplemental interviews were conducted with and information and input received from various City Departments and Divisions, Danville Redevelopment Housing Authority, Chamber of Commerce and Board of Realtors representatives, Continuum of Care organization, community, professional and industry representatives to obtain information from those unable to attend the focus group sessions. Participants in the focus groups sessions and supplemental interviews included Danville City staff and other government representatives; administrators from local colleges, universities, and school districts; non-profit organizations, home builders, housing and social service agencies representatives; real estate and financial industry representatives; and the general public and other community representatives.

Attendees were gathered through invitations sent to select resident and community leaders, organizations, industry professionals and public officials and a public meeting notice published in the local newspaper. At each focus group session, general issues related to the housing market, neighborhoods and concerns pertaining to fair housing choice in Danville were discussed. The Focus Group sessions were hosted by the City of Danville Community Development Department.

It should be noted that the comments summarized in this section represent the comments and views of the focus group participants and those participating in supplemental interviews. JQUAD has made every effort to document all comments as a matter of record, and to ensure that the comments, as presented on the following pages, have not been altered to reflect our analysis,

investigation or substantiation of information obtained during these sessions. Focus Group comments and information obtained during interviews were later analyzed and to the extent substantiated or corroborated by the data and analysis, included in Section Six: Impediments and Remedial Actions. Comments from Focus Group participants included the following.

3.1. Focus Group Concerns and Comments

Social-Economic Conditions

Social-economic issues were of major concern to participants in the focus group sessions as well as those persons participating in the supplemental interviews. Frequently mentioned in the focus group sessions and interviews was the perception that lower income persons and seniors were particularly impacted as the supply of affordable housing in good condition becomes scarce and the cost to purchase homes or to rent housing continues to soar beyond the range affordable to many local area residents. Others believed the number of persons lacking sufficient income for housing and housing related cost was on the rise, severely impacting housing choice for the lowest income households. Participants indicated that insufficient income and cost burden is not only a concern with regard to social equity and the plight of the elderly and lower income households, but limited incomes are also having an adverse impact on the condition and quality of single family owner occupied housing due to deferred maintenance and residents inability to afford maintenance and utility cost. The impact of local unemployment, insufficient incomes to afford housing maintenance and their mortgage payments for persons living in the Danville market were also cited as contributing factors to housing and neighborhood decline.

Focus group participants wanted to have a greater emphasis placed on financial assistance to acquire housing suitable to meet the needs of the evolving demographics in the city and specific problems faced by residents and the

working poor relative to foreclosure and elderly residents on fixed incomes. Participants also felt that increased housing counseling-both pre-purchase and post purchase support was needed to help applicants qualify for financing and to remain current with mortgage payments and home maintenance needs. Increased funding should be identified to provide rental assistance to those needing assistance with rent and utilities and security deposits necessary to initiate a lease. Homebuyers will need assistance with providing greater down payments and equity investments when buying a home, to replace the loss of private mortgage insurance. Participants emphasized the need for increased funding for project based rental assistance due to limitations in funding and long waiting list for the Section 8 Vouchers program.

Housing Supply, Neighborhood Conditions, and Infrastructure and Regulatory Controls

Participants' desired greater emphasis is placed on building codes and regulatory controls being utilized to improve housing conditions, cost and accessibility. Participants recommended incorporating energy efficiency and green building standards in construction of affordable housing; the need for infrastructure to support new housing development and funding for emergency repair and substantial renovation of owner occupied housing.

Decreased funding for entitlement funded programs and public housing were also viewed as primary barriers to affordable housing. Limited local funding for infrastructure and regulatory programs such as code enforcement and demolition were also cited as barriers.

Public Policy and Public Awareness of Fair Housing

Participants cited public awareness of fair housing rights as a concern. They felt that despite fair housing education, training and outreach programs funded by the city, some residents appear to be unaware of their rights under fair housing

law and that the number of violations reported and cases substantiated may be much lower than the number of violations actually occurring. Others felt that residents often fear retaliation by those who violate the laws. For example, attendees and persons interviewed felt that in some instances, people do not register fair housing complaints for fear of retaliation by their landlords, or if they report violations such as housing code, enforcement will result in higher rents or evictions actions by their landlords.

Participants also felt that residents needed increased access to homebuyer education and counseling when considering purchase of a home and rental housing and tenant's rights counseling and advocacy for renters. They were concerned that first-time home buyers often do not know where to go for help or how to start the process of purchasing a home. Others cited housing barriers faced by the "untouchables", persons such as ex-offenders, convicted sex offenders and others recently discharged from the criminal justice system.

Access to Banking and Financial Institutions Products, and Basic Goods and Services

Predatory lending practices were identified as an issue. Perception were that predatory lenders are absorbing much of the market formerly controlled by FDIC insured banks and other reputable financial institutions and fast becoming lenders of choice in some low income and minority concentrated areas. In other instances, persons facing economic hardships are being preyed upon due to their inability to qualify for traditional lending and banking services. For example, predatory businesses provide individuals with loans backed by the title to their car or house at relatively high interest rates. Lenders are quick to foreclose in the event the borrower misses a payment. Attendees and persons interviewed were concerned that a growing number of people have fallen prey to sub prime loans because they have a poor credit rating or limited to no credit history.

Lending, Foreclosures and the Mortgage Industry

The inability to obtain home mortgages was seen as a barrier that limits housing choice. Criminal background histories and immigration status are relatively new factors contributing to the inability to qualify for home purchases and rental housing leases. Credit issues appeared to be the major barrier, based on focus group participants' comments. Both a lack of qualified applicants and an adequate pool of applicants for mortgages, coupled with the inability of some housing units to qualify based on lending program guidelines were cited as barriers. Participants felt that greater emphasis should be placed on credit counseling and financial literacy being accessible to a broader population including youth and young adults age eighteen to thirty. Greater emphasis should be given to preventing damage to one's credit history and providing a solid foundation that could prevent future financial problems. Persons with a criminal felony record and those convicted of sex crimes are having particular problems finding housing to rent as well as qualifying for mortgages.

Special Needs Housing

Participants were concerned that greater funding be provided for the elderly to age in place, and to provide housing for others in need of special needs housing. Participants cited statistics relative to the growth expected in the elderly population over the next decade which will elevate this problem. Without such funding elderly and disabled persons are sometimes placed in nursing homes prematurely, even though they could otherwise continue to live on their own with some limited assistance or ADA accessibility modifications where they currently reside. Participants were also concerned that limited options exist for persons in need of transitional housing whether they be recently paroled, victims of domestic violence, mentally ill, physically handicapped, and homeless or at risk of becoming homeless. Others cited a need for more permanent supportive housing. Other participants asked that CDBG funding be provided to support the operational cost of providing meals on wheels and operation of the food pantry.

Public Transportation and Mobility

Participants cited limited mobility and public transportation as impediments to housing choice. These limitations also included a concern for elderly and disabled persons in need of public transportation to access supportive services. Public transportation was deemed an issue for some persons commuting to major employment centers.

3.2. Other Issues and Solutions

Attendees indicated a need for increased emphasis on mitigating the impacts of increased incidents of discrimination or impediments to housing for persons with disabilities, renters with past criminal records or prior convictions for sexual abuse related crimes, those in need of special needs housing or facing evictions, foreclosures and homelessness.

Participants voiced support for a greater emphasis on credit education and housing consumer counseling. Increased financial literacy courses taught in high schools was a best practice identified by the facilitator for the focus group session and well received by participants.

V. Home Mortgage Disclosure Act Analysis

Introduction

The Consumer Financial Protection Bureau (CFPB) gathers data on home mortgage activity from the federal agencies that regulate the home mortgage industry. This data was formerly gathered by the Federal Financial Institutions Examination Council (FFIEC) until 2016. The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose. The CFPB provides the HMDA databases through their website for download and analysis. Data were input into a spreadsheet for analysis. For this analysis, the CFPB databases were utilized for 2014 through 2017.

The data reported here are summarized by a variety of methods. Tables 4.1 and Tables 4.2 provide information for the City of Danville and Pittsylvania County. Table 4.3 provides information for Danville. Tables 4.3 and the charts present the data by census tract income groups. The maps, provided at the end of this section, present data according to census tracts for Danville and Pittsylvania County.

4.1. Analysis

Table 4.1 examines home loan activities in Danville and Pittsylvania County. The data are presented by loan type, ethnicity, income, and loan purpose. In Pittsylvania County, White applicants represented the largest number of loan applicants at 4,610. Origination rates, the percentage of applications that result in loans being made, for Whites were 55.7 percent. African Americans were the next largest applicant group with 989 applications submitted and an origination rate of over 39.0 percent. Hispanics submitted 85 applications and had an origination rate of about 57.6 percent. Asian origination rates were about 40.9 percent, and there were 22 applications reported. High-income applicants showed both the highest number of applications at 2,527, and the highest origination rate, about 56.8 percent. Both the

number of applications and the origination rates drop significantly for all other income groups, with 856 applications from middle-income applicants and an origination rate of over 52.9 percent. Conventional loans account for the largest number of applications for loan type at 4,143, and an origination rate of over 50.5 percent. Refinance loans show the highest number of applications for loan purpose, at 3,393 and the origination rate of over 43.5 percent. Home improvement loans had an origination rate of about 49.6 percent with 627 loan applications. Home purchase loans had about 48.5 percent origination rate with 3,190 applications.

Isolating the census tracts within Danville, for Loan Type, “Conventional” shows the highest number of loan applications at 1,934, and an origination rate of 54.9 percent. The origination rate for FHA loans was over 38.7 percent. An evaluation of loan purpose reveals that home purchase loan applications were at 1,537 with an origination rate of 54.3 percent. Home Improvement loans had 354 applications with an origination rate of 49.7 percent. For refinance loans, the origination rate was about over 41.3 percent with 1,420 applications. In Danville, White applicants had the highest origination rate at 58.8 percent and the highest number of loan applications, about 1,460. Hispanics had 63 applications and an origination rate of over 50.8 percent. The origination rate for Asians was 60.4 percent with 48 applications. The origination rate for African Americans was about 45.2 percent with 1,006 applications. The origination rate for the very low-income group was 41.4 percent compared to about 55.4 percent among high-income applicants.

Table 4.2 displays the HMDA data for the same data categories (Loan Type, Ethnicity, Income, and Loan Purpose). On this table, however, percentages are taken within category, rather than demonstrating the percentage of applications that result in loan originations. For example, the first percentage in the “% of Originations” column indicates that 57.5 percent of originations in the county were for conventional loans compared to 50.5 percent origination rate from Table 4.1. For comparison, race and ethnic percentages were included under the “% Pop.”

column to compare the percentage of originations by ethnic group to their percentage in the population.

Within the “Loan Type” category, “Conventional” shows the highest percentage, about 88 percent of all originations in Pittsylvania County. FHA loans, which are government insured and have more stringent lending criteria, were about eight percent of all originations. Referring back to Table 4.1, the origination rates were about 34.7 percent for FHA versus approximately 50.5 percent for conventional.

For Ethnicity, “White” shows the highest percentage of origination at 63.2 percent of the total originations in the county. The percentage of Whites in the population was over 76 percent. Hispanic applicants represented over one percent of originations with over 2.5 percent of the total population in the county. Asian applicants accounted for 0.3 percent of all originations, with 0.8 percent of the total population in the county. African American applicants accounted for about 13.6 percent of all originations, with about 22 percent of the total population in the county.

The highest income group (>120% median) displays the highest percentage of originations, at about 35 percent of all originations. In contrast, the very low-income group accounts for less than 7.8 percent of all originations.

The loan purpose data for the county shows that refinance loans were the most frequent purpose at over 47.1 percent. Home purchase loans accounted for over 44.2 percent of the originations. Home improvement loans accounted for about 8.7 percent of all originations.

In Danville, over 66.5 percent of all originations were from conventional loans. FHA loans were over 24.4 percent of all originations. In the city, Whites had the highest percentage of origination, about 52.6 percent of the total. The percentage of Whites in the population was about 48 percent. African American applicants accounted for about 27.9 percent of all originations, with over 51 percent of the total population.

Hispanic applicants accounted for over 2 percent of originations, while their presence in the population was about 4 percent of all residents. Asian applicants represented 0.2 percent of originations with 2 percent of the total population. Native American applicants represented 0.2 percent of originations with 0.2 percent of the total population. The highest income group (>120% median) displays the highest percentage of originations, over 34.8 percent of all originations in the city. In contrast, the very low-income group accounts for less than 8.3 percent of all originations. The loan purpose data show that Refinance loans were the most frequent purpose, over 36.7 percent of all originations in the city. Home Purchase loans accounted for 52.3 percent of the originations. Home improvement loans accounted for about 11 percent of all originations in the city.

Table 4.3, examines the HMDA data more closely with respect to the possibility of redlining within census tracts in Danville. Redlining relates to the avoidance of certain locations by mortgage lenders in response to undesirable characteristics of the area.

Origination rates for Danville indicate that Very Low-Income applicants (<51% median income) were successful in obtaining mortgage loans 8.3 times per 100 loan application submissions, Low-Income applicants (51-80% median income) were successful 15.3 times per 100 submissions, Moderate-Income (81-95% median income) had an origination success ratio of 9.5 percent, Middle-Income applicants (96-120% median income) had an origination success ratio of 12.2 percent, and High-Income applicants (>120% median income) had a 34.8 percent success ratio. When isolating the Low-Income census tracts, the origination rates differ than the overall city origination rates. In Low-Income tracts, Very Low-Income applicants generated originations 36.7 percent of the time. Similar differences in origination rates are noted in the other income groups. Moderate-Income applicants in low-income tracts had a 35.0 percent origination rate. High-Income applicants in low-income tracts had a 51.6 percent origination rate.

Comparing Low-Income tracts to High-Income tracts, moderate to high differences are noted between origination rates. Within High-Income tracts, Very Low-Income applicants generated a 40.4 percent origination rate, 3.7 percentage points higher than Very Low-Income applicants in the Low-Income tracts. High-Income applicants generated a 59.7 percent origination rate within High-Income tracts, 8.1 percentage points higher than in Low-Income tracts. Origination rates for Middle-Income applicants in High-Income tracts were 40.1 percentage points higher than in the Low-Income tracts. While this analysis does not provide conclusive proof that redlining exists, it is reasonable to expect that higher-income applicants would have relatively equal origination rates across all census tracts. The relatively small number of applications in the lower income tracts, however, makes any conclusions about redlining impossible.

Table 4.4 compares origination rates between minorities and White applicants for the various loan purposes and income groups. For all loan purposes shown, White origination rates are much higher than minorities. For home purchase loans, origination rates were 68.3 percent for Whites and 57.9 percent for minorities, a difference of 10 percentage points. White applicants for home improvement loans are successful almost 15 percentage points more often than minorities. The rates for refinance loans show a 16 percentage point difference.

Looking at the income group comparison, minorities actually had relatively close origination rates to Whites in the two lowest income groups. With Moderate Income applicants (81-95% MFI), White origination rates start to show an advantage of 11 percentage points. In the High Income group (>120% MFI), White origination rates are almost 10 percentage points higher. Within each income group, Whites and minorities are entering the loan markets with relatively equal incomes.

Chart 4.1 provides a look at origination rates by census tract income for the loan types: conventional, FHA, and VA. All types of loans had higher origination rates with the increase in income group of tracts. Conventional loans had the highest

origination rate in all income group of tracts and FHA loans had the lowest origination rates in all groups with the exception of VA.

Chart 4.2 shows origination rates by ethnicity and income of the census tract. Whites, Asians and Hispanics show the highest origination rates of all races in all income groups of tracts.

Chart 4.3 looks at total loan applications by year. Conventional home loan applications peaked in 2016 with over 500, as did FHA loan applications for the year. The highest amount of home purchase home loan applications were submitted in 2016 and 2017. In 2016, over 400 refinance applications were recorded, compared to less than 100 for home improvement loans.

Chart 4.4 looks at origination rates by loan purpose and income of the census tract. Applications for all loan types typically have a higher success rate as the tract income increases. Home purchase and refinance loans peaked at High-Income tracts. Home improvement loans have the lowest origination rates in low and moderate income tracts.

Map 4.1 and maps 4.3 through 4.7 look at loan activity by census tract. The ratio of denials to originations was calculated for each loan purpose and loan type. Tracts shown in the darkest blue indicate those areas where at least 59 applications are denied for every 100 applications that are originated. The purple areas indicate those areas where between 53 and 58 applications are denied for every 100 applications originated. The red areas show 45 to 52 applications denied for every 100 applications originated. The yellow areas show 34 to 44 applications denied for every 100 applications originated.

Map 1.7 in the Community Profiles section shows the median household income for Danville by census tract between 2013 and 2017. Comparing Map 4.1 and Map 1.7, the areas that had higher denial to origination ratio for all types of home loans

generally coincide with areas with lower incomes. This indicates that lower income census tracts had lower home loan origination rates.

Map 4.2 shows the total number of loan originations by census tract. Less active areas are shown in the lighter colors, with the most active areas in darker colors. Unlike the other maps, the light areas are meant to indicate areas of concern, either for a lack of loan activity or for their low rate of application originations in relation to denials.

4.2. Conclusions

In Danville and Pittsylvania County, the highest success in loan originations was in the home improvement loans and the least success was in refinance loans. Overall, the origination rates among Whites were higher than minorities in home purchase, home improvement, and refinance loans.

Refinance loans were the most frequent loan type in the county and the city. The loan applications and originations were significantly lower compared to their percentage in population for African Americans and Hispanics in the county and the city. The analysis reveals two issues, the lack of applications from minorities and the disproportionate loan denials rates between Whites and some minority populations. One possible explanation for lower loan originations among minorities could be lack of credit history, poor credit history, or higher debt-to-income ratio. During the period between 2014 and 2017, the majority of loan denials for all applicants were related to the applicants' credit history.

While our analysis does not provide conclusive evidence of redlining, the data tend to suggest that some characteristics of redlining may exist and therefore impacting lending decisions and higher denial rates in some of the very low-income census tracts in Danville. While it is expected that very low-income applicants would not have a very high success rate in their loan applications, within the very low-income census tracts, even high-income applicants showed a poor success rate. Due to very low number of applications in the lower income census tracts, any conclusive determination of redlining is impossible for the city.

The higher denial rates for lower income groups, coupled with the possibility that characteristics of redlining may be adversely impacting originations in lower income concentrated census tracts, are indicative of impediments to fair housing. Overall, lending activity has decreased in the recent years due to economic slow down and issues relative to the mortgage industry nationwide. However, the outlook for lending in this community remains positive since lower interest rates still exist for borrowers to buy housing or refinance existing higher interest loans.

Table 4.1

**Home Mortgage Disclosure Act (HMDA) Analysis
Comparison of Number of Loan Applications and Origination Rates
City of Danville and Pittsylvania County
2014 - 2017**

	Danville		Pittsylvania County	
	Number of App.s	Origin. Rate	Number of App.s	Origin. Rate
Loan Type:				
Conventional	1,934	54.9%	4,143	50.5%
FHA	1,007	38.7%	1,644	37.7%
VA & Other	370	39.1%	1,423	43.9%
Ethnicity:				
American Indian or Alaska Native	8	50.0%	25	24.0%
Asian	48	60.4%	22	40.9%
Black or African American	1,006	45.2%	989	39.0%
Not Provided	279	45.9%	663	44.2%
Native Hawaiian or Other Pacific Islander	9	77.8%	6	66.7%
Not applicable	501	23.4%	895	8.0%
White	1460	58.8%	4610	55.7%
Hispanic	63	50.8%	85	57.6%
Income:				
<51% median (very low)	319	41.4%	560	31.8%
51-80% median (low)	481	50.7%	1,051	44.5%
81-95% median (moderate)	264	57.6%	659	51.6%
96-120% median (middle)	372	52.4%	856	52.9%
>120% median (high)	1004	55.4%	2527	56.8%
Unknown	871	36.6%	1557	29.7%
Loan Purpose:				
Home Purchase	1,537	54.3%	3,190	48.5%
Home Improvement	354	49.7%	627	49.6%
Refinance	1,420	41.3%	3,393	43.5%
Totals	3,311	48.2%	7,210	46.2%

Table 4.1: Source: Home Mortgage Disclosure Act (HMDA)

Table 4.2

**Home Mortgage Disclosure Act (HMDA) Analysis
Comparison of Originations Within Categories
City of Danville and Pittsylvania County
2014 -2017**

	# of Originations	Danville % of Originations	%Pop.	Pittsylvania County # of Originations	% of Originations	%Pop.
Loan Type:						
Conventional	1,063	66.5%		4,143	57.5%	
FHA	390	24.4%		1,644	22.8%	
VA & Other	145	9.1%		1,423	19.7%	
Ethnicity:						
American Indian or Alaska Native	4	0.2%	1.0%	25	0.3%	0.8%
Asian	29	1.8%	1.4%	22	0.3%	0.8%
Black or African American	455	27.9%	51.3%	989	13.6%	22.3%
Not Provided	128	7.9%		663	9.1%	
Native Hawaiian or Other Pacific Islander	7	0.4%	0.2%	6	0.1%	0.1%
Not applicable	117	7.2%		895	12.3%	
White	858	52.6%	47.9%	4,610	63.2%	76.5%
Hispanic	32	2.0%	3.9%	85	1.2%	2.5%
Income:						
<51% median	132	8.3%		560	7.8%	
51-80% median	244	15.3%		1,051	14.6%	
81-95% median	152	9.5%		659	9.1%	
96-120% median	195	12.2%		856	11.9%	
>120% median	556	34.8%		2,527	35.0%	
Unknown	319	20.0%		1,557	21.6%	
Loan Purpose:						
Home Purchase	835	52.3%		3,190	44.2%	
Home Improvement	176	11.0%		627	8.7%	
Refinance	587	36.7%		3,393	47.1%	
Totals	1,598	100.0%		3,336	100.0%	

Table 4.2: Source: Home Mortgage Disclosure Act (HMDA)

Table 4.3

**Analysis of Home Mortgage Disclosure Act Data, 2014 - 2017
Analysis of Redlining in Low-Income Census Tracts**

	City of Danville Number of Applications	Origination Rate
Low-Income Tracts		
<51% median	30	36.7%
51-80% median	20	35.0%
81-95% median	7	14.3%
96-120% median	3	66.7%
>120% median	31	51.6%
High-Income Tracts		
<51% median	47	40.4%
51-80% median	87	51.7%
81-95% median	57	54.4%
96-120% median	83	42.2%
>120% median	290	59.7%
Difference Between High and Low Tracts (percentage point difference)		
<51% median		3.7%
51-80% median		16.7%
81-95% median		40.1%
96-120% median		-24.5%
>120% median		8.1%
Origination Rates for Danville		
<51% median		8.3%
51-80% median		15.3%
81-95% median		9.5%
96-120% median		12.2%
>120% median		34.8%
Unknown		

Table 4.3: Source: Home Mortgage Disclosure Act (HMDA)

Table 4.4
Analysis of Home Mortgage Disclosure Act Data

HMDA Activity for City of Danville, 2014 - 2017

	# Apps.	% of Apps.	% Denied	% Orig.
Home Purchase Loans				
Minorities	516	33.4%	16.5%	57.9%
White	693	44.8%	12.8%	68.3%
Not Provided	337	21.8%	0.9%	20.8%
Home Improvement Loans				
Minorities	196	54.7%	46.9%	44.4%
White	141	39.1%	33.6%	58.6%
Not Provided	22	6.1%	50.0%	31.8%
Refinance Loans				
Minorities	607	42.6%	27.5%	32.6%
White	627	44.0%	26.8%	48.3%
Not Provided	190	13.3%	28.9%	45.3%
Income Groups				
<51% MFI				
Minorities	146	45.1%	45.9%	31.5%
White	151	46.6%	37.7%	48.3%
Not Provided	27	8.3%	29.6%	51.9%
51 to 80% MFI				
Minorities	207	43.0%	25.6%	42.5%
White	232	48.2%	21.1%	60.3%
Not Provided	42	8.7%	35.7%	38.1%
81 to 95% MFI				
Minorities	113	42.8%	26.5%	54.0%
White	128	48.5%	14.8%	64.1%
Not Provided	23	8.7%	43.5%	39.1%
96 to 120% MFI				
Minorities	152	40.9%	32.2%	44.1%
White	186	50.0%	21.0%	55.9%
Not Provided	34	9.1%	26.5%	70.6%
>120% MFI				
Minorities	319	31.8%	25.7%	48.6%
White	580	57.8%	17.9%	61.0%
Not Provided	105	10.5%	25.7%	44.8%

Table 4.4: Source: Home Mortgage Disclosure Act (HMDA)

Chart 4.1: Origination Rates by Loan Types by Income of Census Tracts

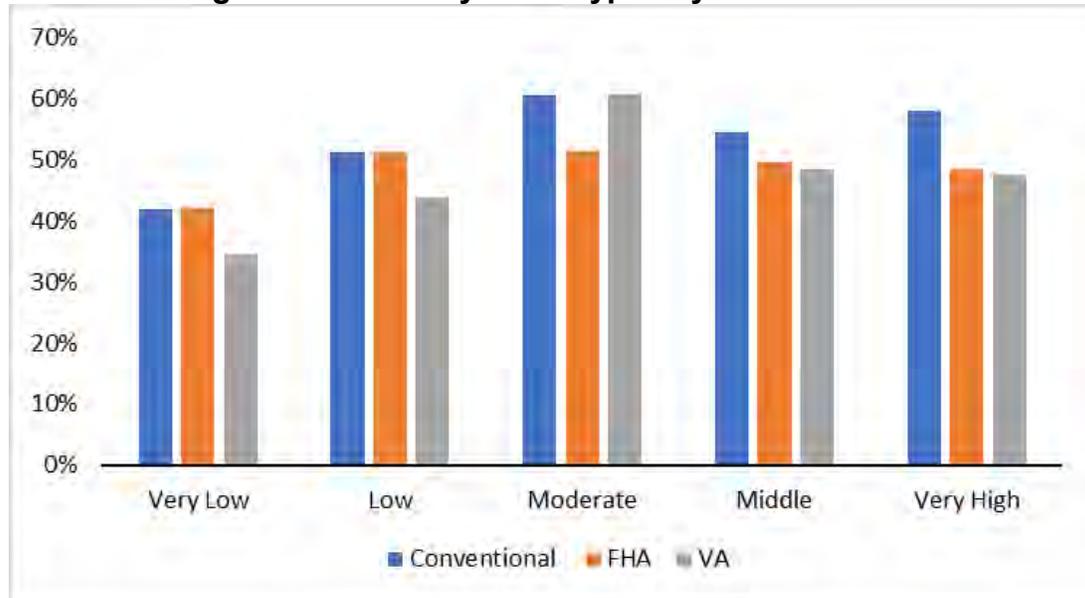


Chart 4.1: Source: Home Mortgage Disclosure Act (HMDA)

Chart 4.2: Origination Rates by Ethnicity by Income of Census Tracts

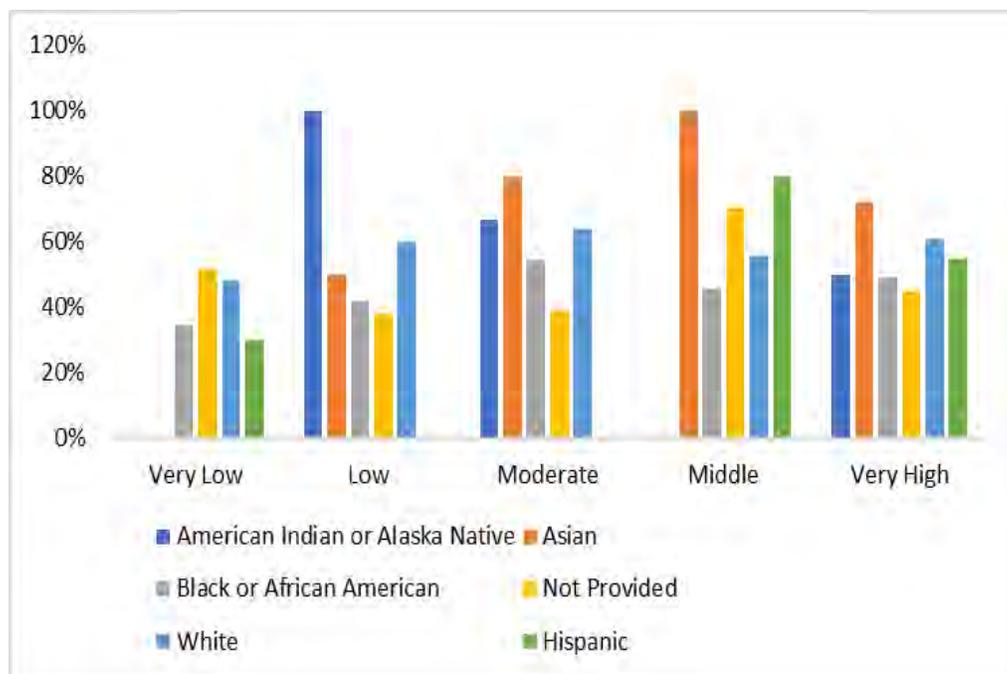


Chart 4.2: Source: Home Mortgage Disclosure Act (HMDA)

Chart 4.3 Source: Home Mortgage Disclosure Act

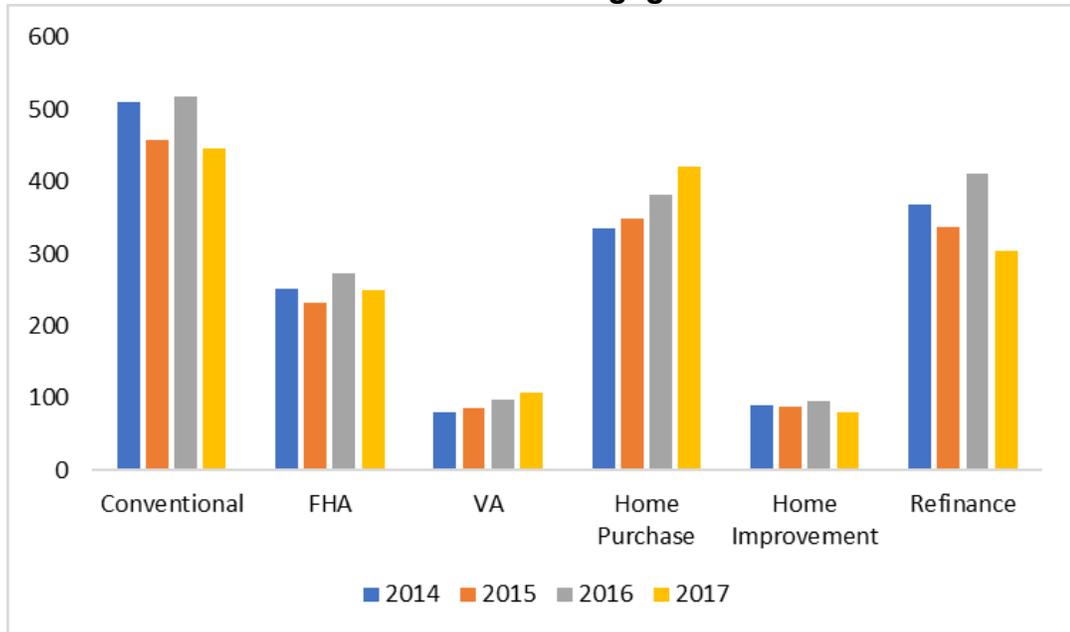


Chart 4.3: Source: Home Mortgage Disclosure Act (HMDA)

Chart 4.4: Origination Rates by Loan Purpose by Income of Census Tracts

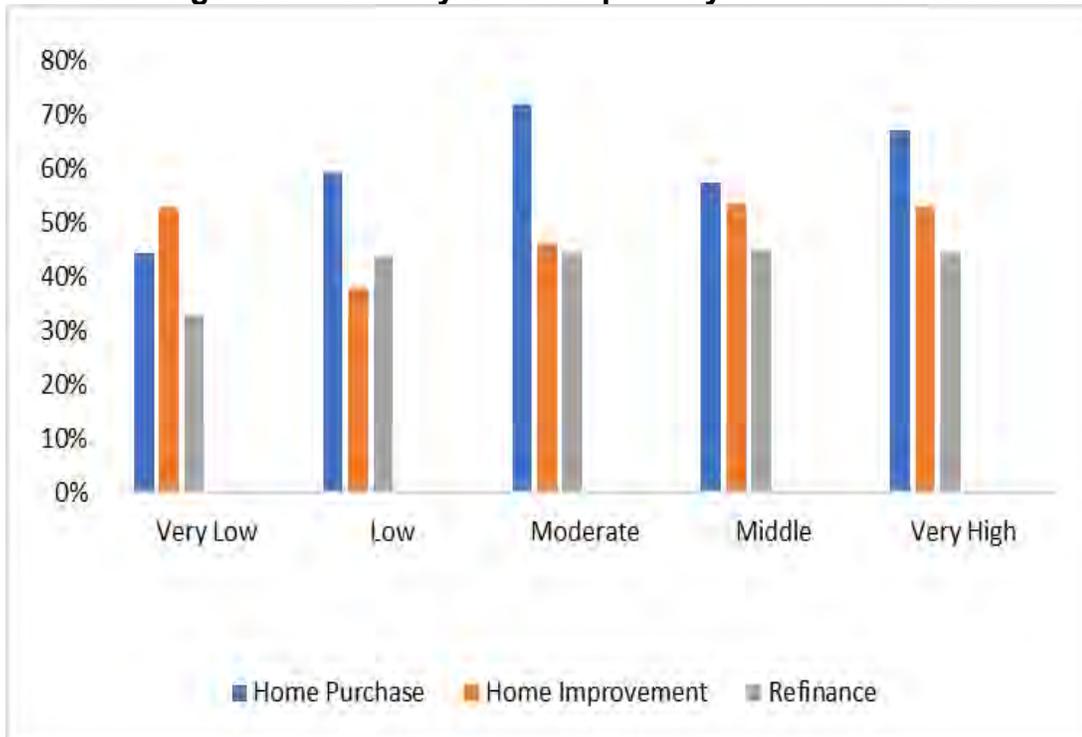
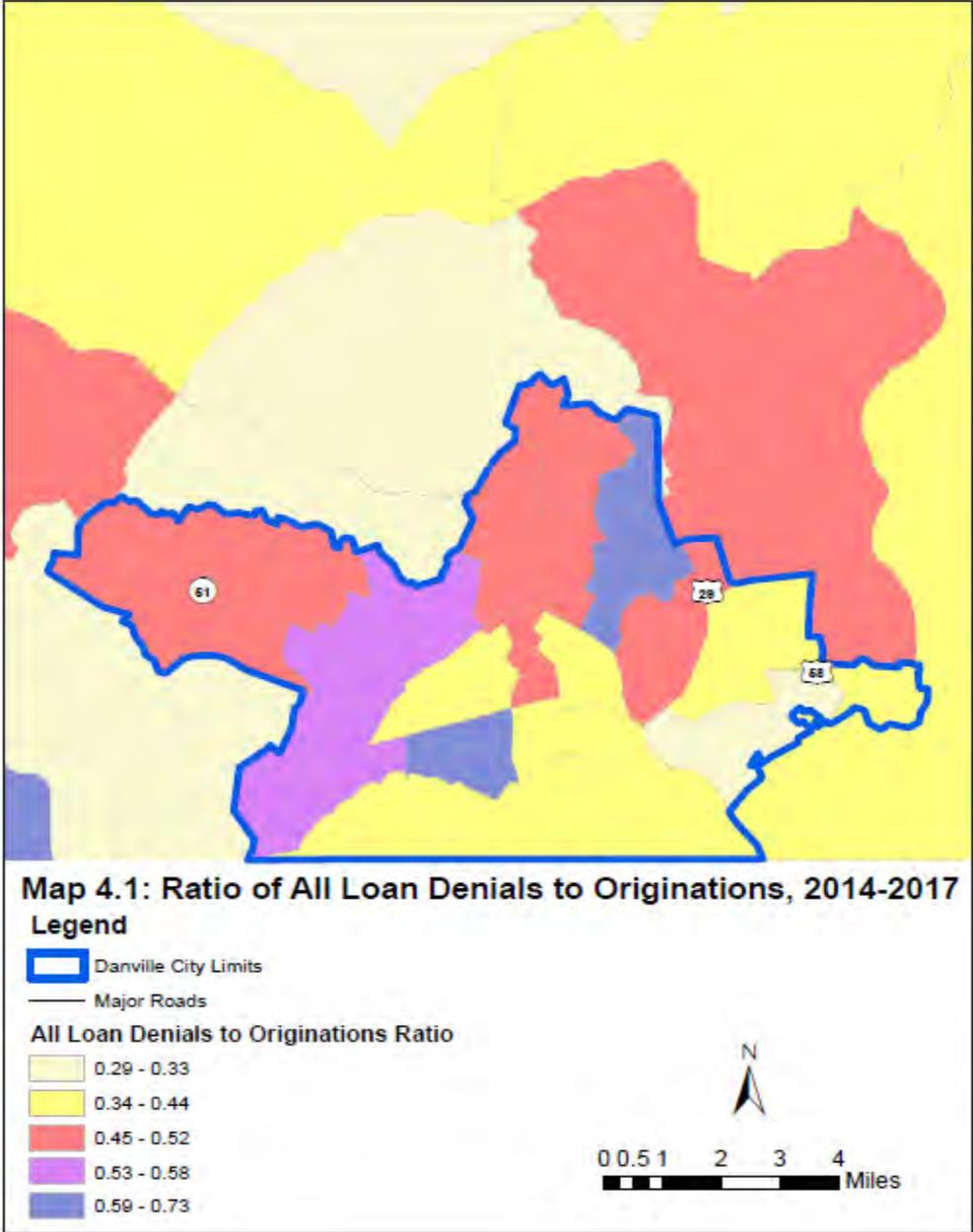


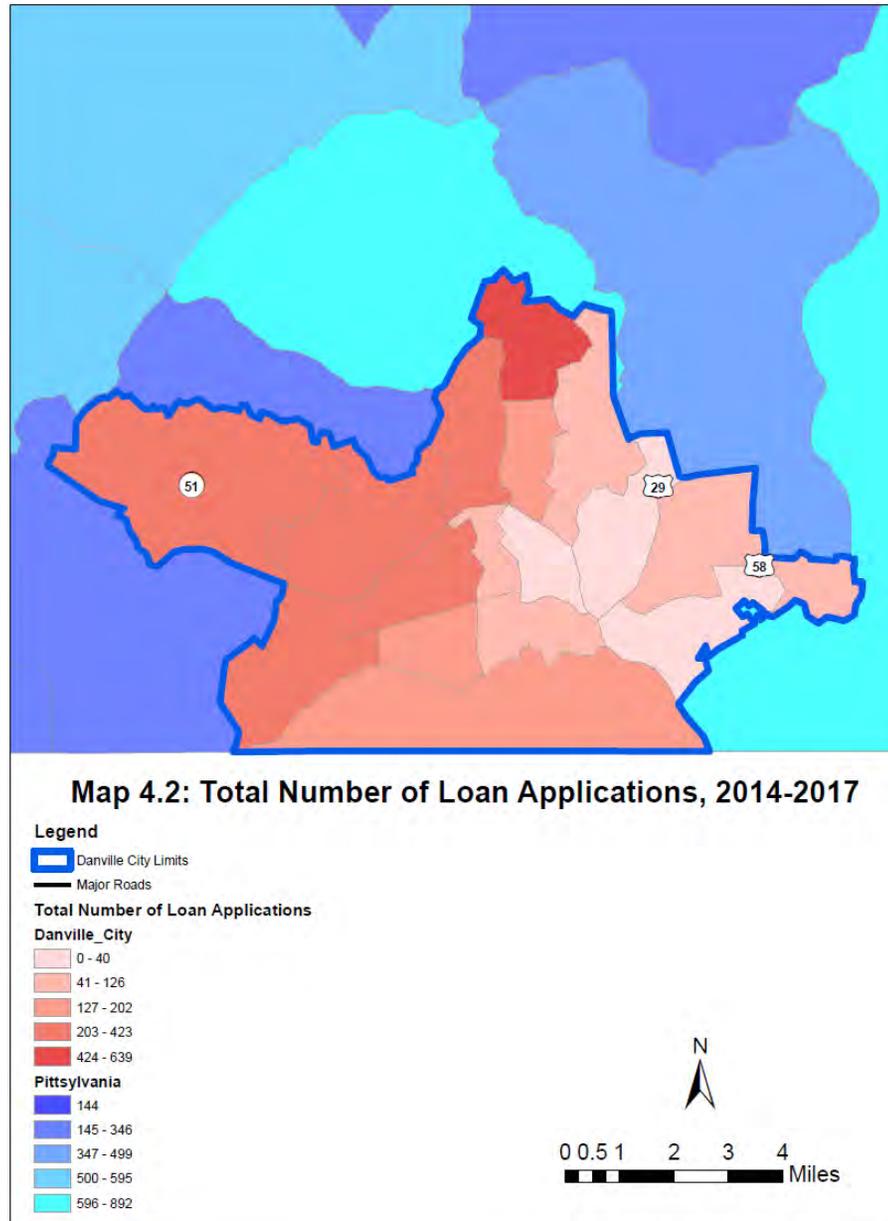
Chart 4.4: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.1: Ratio of All Loan Denials to Originations, 2014-2017



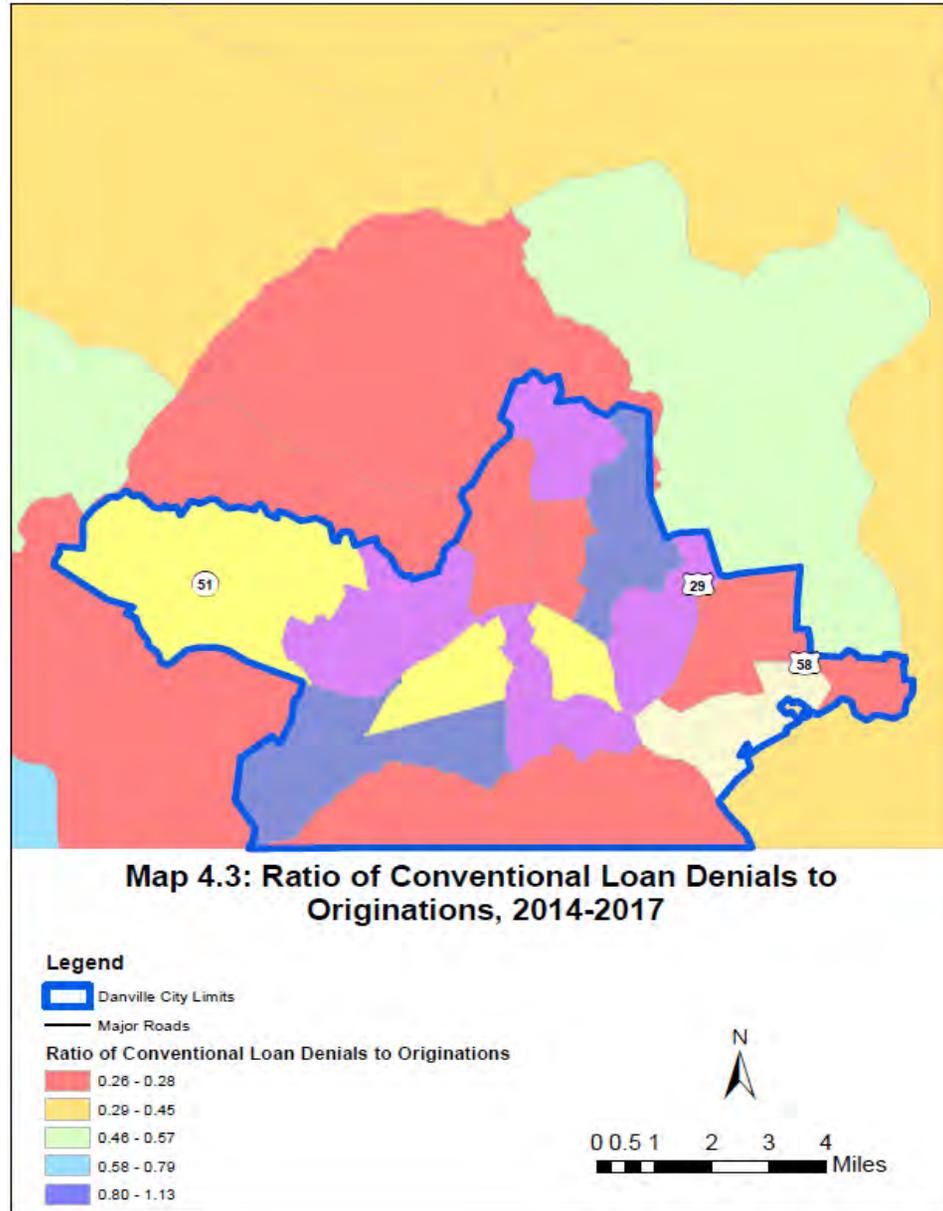
Map 4.1: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.2: Total Number of Loan Applications, 2014-2017



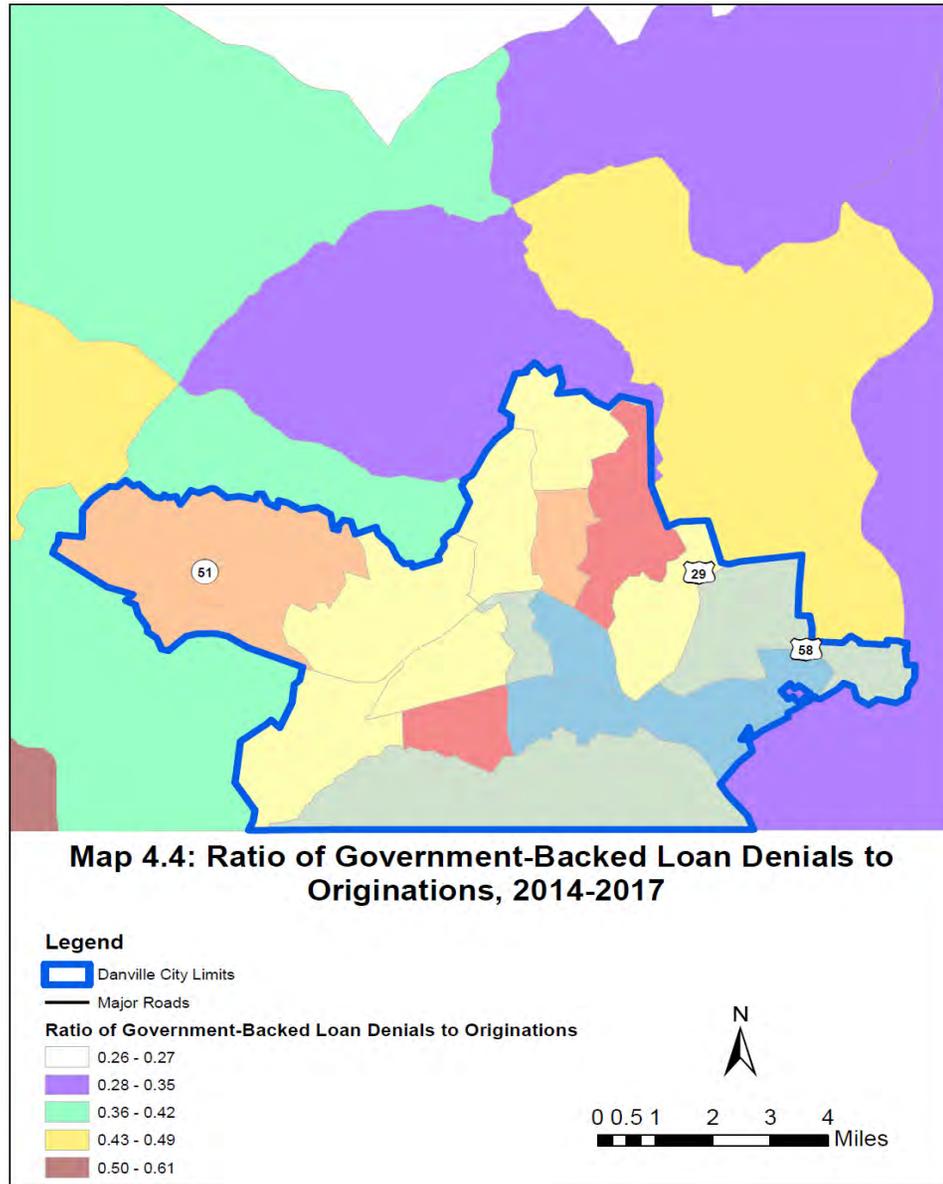
Map 4.2: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.3: Ratio of Conventional Loan Denials to Originations, 2014-2017



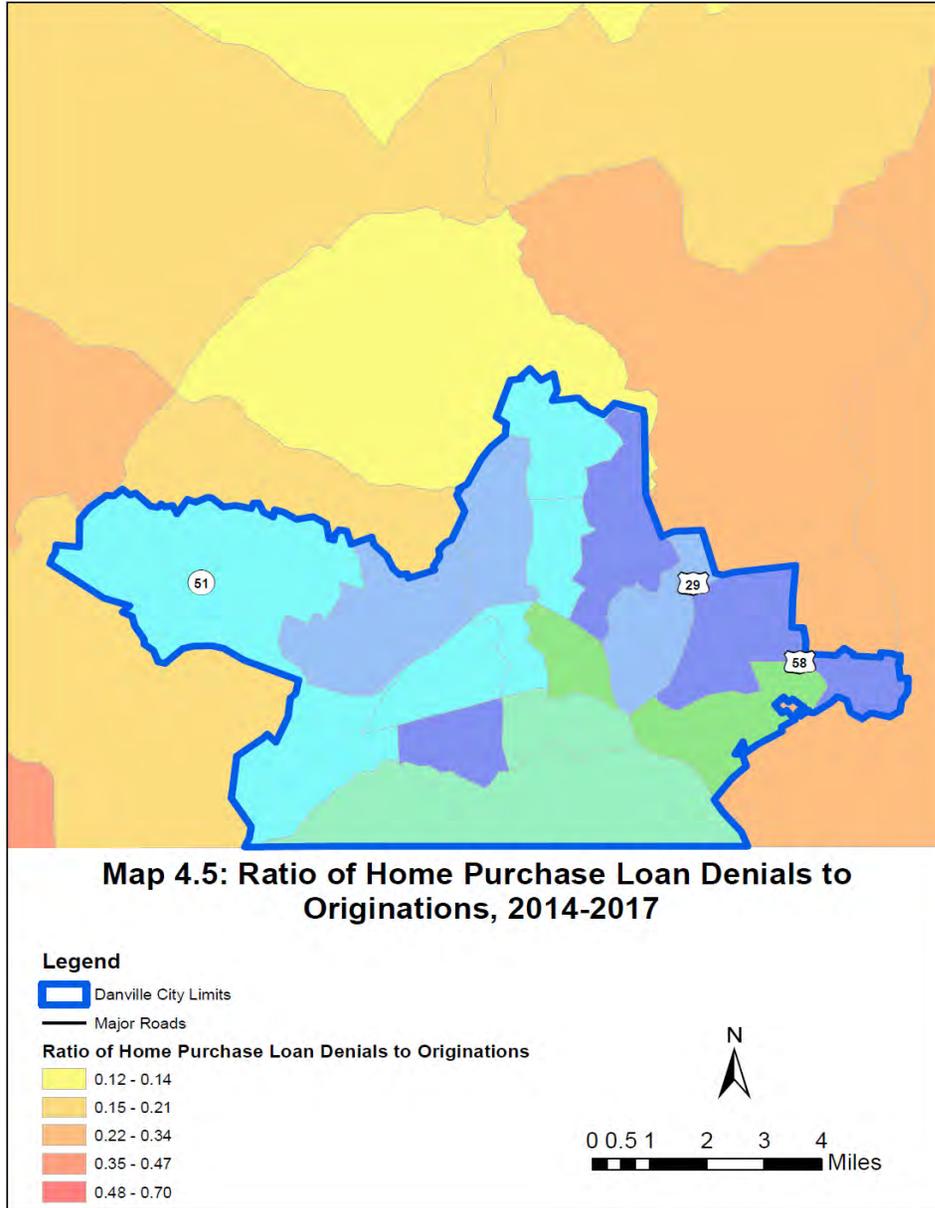
Map 4.3: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.4: Ratio of Government-Backed Loan Denials to Originations, 2014-2017



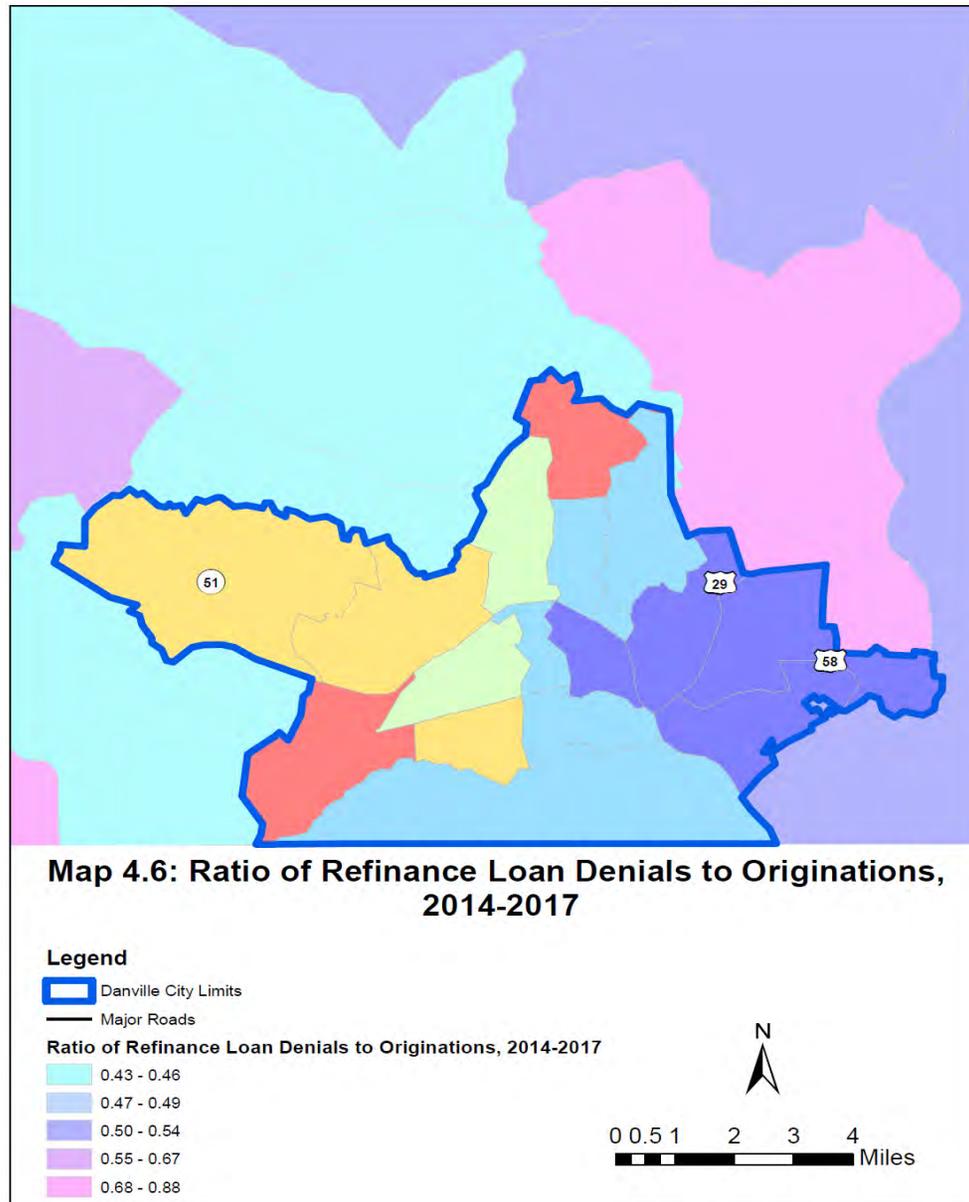
Map 4.4: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.5: Ratio of Home Purchase Loan Denials to Originations, 2014-2017



Map 4.5: Source: Home Mortgage Disclosure Act (HMDA)

Map 4.6: Ratio of Refinance Loan Denials to Originations, 2014-2017



Map 4.1: Source: Home Mortgage Disclosure Act (HMDA)

VI. Assessment of Actions Taken Relative To Past Performance Goals, Remedial Actions, and Strategies for 2015 AI

- 1. Section VI. Fair Housing Impediments and Goals identified and prioritized for action in recent Analysis of Impediments or other relevant planning documents:**

2015 Analysis of Impediments to Fair Housing Choice

Impediments to fair housing choice for the 2019 AI were detailed in Section Six of 2015 Analysis of Impediments report. The impediments identified draws on information collected and analyzed to provide a detailed analysis of fair housing impediments in Danville. Impediments were divided into five major categories: Real Estate Impediments; Public Policy Impediments; Neighborhood Conditions as Impediments; Banking, Finance, and Insurance Related Impediments; and Socioeconomic Impediments. For each impediment identified, issues and impacts are detailed. Remedial actions are recommended, when appropriate, to address each impediment. Some of the remedial actions and recommended goals are conceptual frameworks for addressing the impediments. The goals require further research, analysis, and final program design by the City of Danville for implementation.

Goals and Remedial Activities designed to address impediments

The major focus of the recommended remedial actions and goals are centered on creating partnerships, identifying new federal resources and leveraging private funding needed to enhance the jurisdiction's ability to increase its supply of affordable housing and better meet the needs of low-income and moderate-income households. Other remedial actions are recommended as a means of reversing the negative and sometimes disparate impacts of the market conditions and mortgage lending trends that adversely and disproportionately impact minorities and members of the protected classes under the fair housing act. These include sub-prime lending, foreclosures, credit and collateral deficiencies that impact loan origination rates, poverty, employment and income. The goals were prioritized by the City with input from the public and the details of the identified goals and remedial actions are presented in Section 6 of the 2015 Analysis of Impediments report.

a. City's progress toward their achievement of the goals of previous AI.

The following describes the goals that were included in the City's 2015 Analysis of Impediments to Fair Housing and the progress that has been made toward their achievement:

Real Estate Impediments

Impediment No.1: Housing affordability and insufficient income, that is households having inadequate income to acquire housing currently available in the market, may be the most critical impediment faced by households in Danville. Based on data on affordability and financing and according to local affordable housing developers, agencies and individuals, availability of financing presents a primary barrier to producing new affordable and subsidized housing. Credit access remains a real challenge for potential homebuyers. Cost burden was also a major concern based on the 2008-2011 ACS estimates which revealed a significant percentage of the population at all income levels are paying more than 30 percent of their income for rent and home ownership.

Impediment No. 2: Development constraints and supply of available labor and supplies constrains new housing production. In the neighborhoods, the issue of land available for acquisition to build affordable housing is further complicated by the number of vacant private and adjudicated properties that cannot be utilized for development due to various legal constraints and tax encumbrances. As a result, new residential production occurring as infill projects is often a more challenging and costly development type. Land cost are high and not cost effective in some instances when developing affordable housing. Construction cost associated with construction (materials and labor) have increased due to market increases and natural disasters.

Goals: Support the increased production of affordable housing through public private partnerships with developers, and capacity building for nonprofits. Facilitate access to below-market-rate units. Maintain a list of lenders and implement programs that leverage resources that help buyers' access below-market-rate loans and locally sponsored down-payment and mortgage assistance programs. The City will to work with Danville Housing and redevelopment Authority, local banks, developers and non-profit organizations to expand affordable housing and economic development and encourage private sector support for affordable housing initiatives. Seek State and

non-entitlement grant resources to increase funding for housing development, mortgage assistance and encourage private sector support for affordable housing initiatives.

Banking, Finance, Insurance and other Industry related impediments

Impediment No. 3: Impacts of Increased Foreclosures, Rising Unemployment Rates, and the Sub-Prime Mortgage Lending Crises on Housing Choice, Affordability and Sustainability.

Goals: The City will continue to support initiatives that reduce mortgage defaults and foreclosure rates among low and moderate-income home buyers **and** removing language barriers that reduce housing choice for limited English-speaking persons.

Impediment No. 4: Low number of loan applications for minorities and low origination rates for minority applicants. This is evidenced in the HMDA analysis that shows African Americans accounting for the highest percentage of Danville's population in years 2006 - 2010, but their percentages of loan originations are much lower compared to their percentage of population in the jurisdiction. In the City of Danville, Whites had the highest percentage of origination, about 61 percent of the total. The percentage of Whites in the population was about 48 percent. African American applicants accounted for about 31 percent of all originations, with over 48 percent of the total population. Hispanic applicants accounted for just over one percent of originations, while their presence in the population was about three percent of all residents.

Goals: Allocate entitlement funding, if available, for homebuyer outreach and education, credit counseling and financial literacy in order to increase the number of minorities who apply and qualify for mortgage loans. Encourage financial institutions and mortgage companies to expand their homebuyer support services to more people as a means of improving the origination rates among minorities. Design and support financial literacy and credit counseling programs for high school seniors and juniors and first year college students as part of their required courses. Support homebuyer education and credit counseling programs that address poor credit and lack of credit which remain the leading cause for denial among applicants of all races and ethnicities.

Impediment No. 5: Predatory lending practices are aggressively absorbing the market formerly controlled by FDIC insured banks and other reputable financial institutions and fast becoming lenders of choice in some low income and minority concentrated areas. In other instances, persons facing economic hardships are being preyed upon due to their inability to qualify for traditional lending and banking services. In other instances, participants were concerned with underwriting criteria used by lenders, failure to adjust ratios or provide funding with more favorable terms, or simply the influences of the foreclosure rates and sub-prime lending on mortgage approvals and higher private mortgage insurance for small loans.

Goal: Encourage lending institutions to extend banking services to low-income census tracts and provide outreach to the low income and minority households to lessen the use of predatory lenders by offering products and services to establish or reestablish checking, saving, and credit accounts for residents that commonly utilize check cashing services.

Socio-Economic Impediments

Impediment No. 6: Barriers to Fair Housing Choice Impacts on Special Need Populations. Special needs populations face a disproportionate rate of barriers to fair housing choice than that of mainstream populations. A shared disadvantage faced by many special need's households are the impacts of living in poverty, lost wages and living on lower, fixed or no income. These limitations are major factors preventing their exercise of housing choice. Minority and special needs populations are hardest hit by poverty and lower income. Challenges for other special needs populations such as the elderly and disabled are changing as they trend toward living longer, experience unaffordable maintenance and overhead, cost and finding housing allowing them to live and age in place.

Goal: Provide language assistance to persons with limited English proficiency. The City of Danville and its entitlement grant-funded agencies shall implement and maintain a language access plan (LAP) consistent with federal guidelines to support fair access to housing for LEP persons.

Goal: Implement an Affirmative Fair Housing Marketing Plan (AFHMP) to create fair and open access to affordable housing, insuring that individuals of similar economic levels in the same housing market areas have equal access to a like range of housing

choices regardless of race, color, religion, sexual orientation, gender, familial status, disability, or national origin. Provide outreach to private landlords not receiving entitlement funding and encouraging landlords to embrace fair education for the staff and management and participate in entitlement funded affordable housing and fair housing programs education and outreach.

Goal: Continue to expand job opportunities through the recruitment of corporations, the provision of incentives for local corporations seeking expansion opportunities, assistance with the preparation of small business loan applications, and other activities whose aim is to reduce unemployment and expand the base of higher income jobs. The City, in conjunction with local business interest, will continue to actively recruit industries that match the demographics of the populations most unemployed, as a means of improving poverty rates, incomes and home ownership rates in the city.

Impediment No. 7: Reduce poverty and low-income among minority populations impacting fair housing choice. The poverty data reported in the census reveals that poverty was disproportionately impacting the Hispanic and African American communities in the City. The incidence of poverty among African-Americans was 34.8 percent of the total population between 2008 and 2012, and Hispanics was reported to be 35.7 percent. Among White persons, the data reported 15.4 percent lived in poverty. In comparison, the poverty rate for the city was 26.1 percent during the period.

Goals: The City and Chamber will continue to work on expanding job opportunities through the recruitment of corporations, incentives for local corporations seeking expansion opportunities, and other activities aimed at reducing unemployment and expanding the base of higher income jobs. The City in conjunction with Chamber will actively support recruiting industries that match the demographics of the populations experiencing high unemployment, as a means of decreasing poverty rates, and increasing incomes and home ownership rates.

Impediment No. 8: High Poverty and lower incomes, limited job training, workforce development, and economic opportunity among minority populations and lack of access to healthy, affordable food choices. For many households, low access to healthy, affordable food translates into a higher incidence of nutrition-related diseases, including diabetes and heart disease and is a major factor preventing their exercise of housing choice.

Goals: The City of Danville should evaluate and consider applying for USDA Food Desert, Housing Choice Neighborhood Grant and related grant funding.

Neighborhood Conditions Related Impediments

Impediment No. 9: Limited affordable housing units and resources to assist lower income, elderly, and disabled homeowners maintain their homes and stability in neighborhoods. While some neighborhoods in the City of Danville are relatively stable and its housing stock in fair to good condition, there were neighborhoods experiencing moderate to severe decline. Other neighborhoods are in transition, showing early characteristic of declining conditions and likely will continue to decline if routine and preventive maintenance does not occur in a timely manner. A major component of affordable multifamily - public and assisted housing in Danville is comprised of public housing developments operated by Danville Housing and Redevelopment Authority and privately-owned multifamily housing funded with various forms of federal and state assistance. A number of these developments were built prior to 1975 and some need substantial renovation or otherwise obsolete based on today's standards. Many of these units are concentrated in minority concentrated areas and areas with high concentrations of lower income residents. Participants in focus group sessions were concerned about limited housing choices and affordability for former felons, homeless populations, and associated cost including security deposits, cost of utilities, and ability to be approved based on leasing qualifications.

Goals: The City of Danville, in conjunction with the Housing and Redevelopment Authority of Danville will evaluate applying for a HUD Choice Neighborhood Implementation Grant from HUD as a primary means of improving neighborhoods experiencing decline and currently designated as concentrated and segregated R-ECAP areas.

The City will continue efforts in providing volunteer-based initiatives aimed at improving housing conditions and neighborhood stability. Other activities that will be considered include:

- Increase self-help initiatives such as "fix-up," "paint-up," or "clean-up" campaigns and "corporate repair projects

- Implement Youth Construction Build and Repair Program in conjunction with school district, formally funded by HUD to public housing authorities.
- Organize a “Compliance Store” where home builders, building supply stores, merchants, and celebrities, are used to demonstrate simple, cost effective ways to make improvements to houses and donate building supplies for use in self-help projects. The supplies and storage facility for supplies could be provided to enrollees by building supply stores, contractors, and hardware stores.
- Organize "adopt-a-block" and "adopt-an-intersection" campaigns
- Continue promoting Community Gardens as interim uses on select vacant lots provide an opportunity for neighborhood residents to work together to increase the attractiveness of their neighborhood.

Public Policy Related Impediments

Impediment No. 10: Increased public awareness of fair housing rights and local fair housing legislation and local enforcement should be evaluated. The City of Danville has not enacted local Fair Housing Law deemed substantially equivalent to the federal act, offering similar rights, remedies, and protections to the protected classes afforded protections under the federal law. The City does not provide for local enforcement of the State and Federal Fair Housing Acts, instead relying on the federal government and State agencies for enforcement.

Goals: The City of Danville will evaluate the enactment of local fair housing legislation and local funding for education and outreach.

2. Section VI. Fair Housing Impediments and Goals Description of City achieving past goals, and /or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

The City continues to address issues of infrastructure, workforce development – economic development, affordable housing, and provide public services that support low income, disabled and senior persons and households with its entitlement programs. Despite many challenges and limited funds available, the City and Danville Housing and Redevelopment Authority remains committed to improving their ability to address the needs of persons desiring and requesting funding and removing barriers and impediments to fair housing. Below are the actions taken in response to the 2015 Analysis of Impediments.

Real Estate Impediments

Impediment No. 1: Housing affordability and Insufficient Income, that is households having inadequate income to acquire housing currently available in the market, may be the most critical impediment faced by households in Danville. Based on data on affordability and financing and according to local affordable housing developers, agencies and individuals, availability of financing presents a primary barrier to producing new affordable and subsidized housing. Credit access remains a real challenge for potential homebuyers. Cost burden is also a major concern as the 2008-2011 ACS estimates reveal a significant percentage of the population at all income levels are paying more than 30 percent of their income for rent and home ownership.

Impediment No. 2: Development constraints and supply of available land for housing development constrains new housing production. In the inner city, the issue of land available for affordable housing is further complicated by the number of vacant private and adjudicated properties that cannot be utilized for development due to various legal constraints and tax encumbrances. As a result, new residential production as infill projects is often a more challenging and costly development type. Land cost are high and not cost effective in some instances when developing affordable housing. Construction cost associated with construction (materials and labor) have increased due to market increases and natural disasters.

Implementation: The City has developed new units utilizing Home and CDBG Entitlement, including new construction by local CHDO organizations, and reconstruction leveraging private financing to make housing affordable.

Banking, Finance, Insurance and other Industry Related Impediments

Impediment No. 3: Impacts of Increased Foreclosures, Rising Unemployment Rates, and the Sub-Prime Mortgage Lending Crises on Housing Choice, Affordability and Sustainability. Virginia.

Implementation: The City worked to address barriers to affordable housing development and availability in order to reduce the cost burden on low and moderate income residents by implementing the following strategies: created access to financial institutions and provided financial education to assist in improving their financial profile; expanded homebuyer education classes and credit repair classes to increase the stream of qualified homebuyers entering the housing market; worked with Community Partners to develop a widely accessible purchase program that will help builders find buyers for affordable houses. The City sponsored Homebuyer Assistance Program has been used for the past four years as a primary means of leveraging private mortgage funding with entitlement funded down payment and closing cost for affordable housing purchase.

Impediment No. 4: Low number of loan applications for minorities and low origination rates for minority applicants.

Implementation: The City worked to address barriers to affordable housing development and availability in order to reduce the cost burden on low and moderate income residents implementing the following strategies: created access to financial institutions and provided financial education to assist in improving their financial profile; homebuyer education and credit repair classes to increase the stream of qualified homebuyers entering the housing market.

Impediment No. 5: Predatory lending practices are aggressively absorbing the market formerly controlled by FDIC insured banks and becoming lenders of choice in some low income and minority concentrated areas. Persons facing economic hardships are being preyed upon due to their inability to qualify for traditional lending services. Other concerns include some underwriting criteria used by lenders, failure to adjust ratios or provide funding with more favorable terms, or simply the influences of the foreclosure rates and sub-prime lending on mortgage approvals and higher private mortgage insurance for small loans.

Implementation: The City continued to support initiatives that increase the development of affordable housing and mortgage financing, and initiatives that help reduce mortgage defaults and foreclosures rates among low- and moderate-income home buyers. The City continued to support programs repair existing housing and preserve affordability among low- and moderate-income home buyers and existing homeowners.

Socio-Economic Impediments

Impediment No. 6: Barriers to Fair Housing Choice Impacts on Special Need Populations. Special needs populations face a disproportionate rate of barriers to fair housing choice than that of mainstream populations. A shared disadvantage faced by many special needs' households are the impacts of living in poverty, lost wages and living on lower, fixed or no income. These limitations are major factors preventing their exercise of housing choice. Minority and special needs populations are hardest hit by poverty and lower income.

Implementation: The City in partnership with businesses continued to work on expanding job training and employment opportunities through the recruitment of corporations the provision of incentives for local corporations seeking expansion opportunities, and job training activities aimed at reducing unemployment and expanding the base of higher income jobs.

Impediment No. 7: Reduce poverty and low-income among minority populations impacting fair housing choice. The poverty data shows major disparities for African Americans compared to that of Whites and citywide poverty totals.

Implementation: The City in partnership with the local universities and businesses continued to work on expanding job training and employment opportunities through the recruitment of corporations the provision of incentives for local corporations seeking expansion opportunities, and job training activities aimed at reducing unemployment and expanding the base of higher income jobs.

Impediment No. 8: High Poverty and lower incomes, limited job training, workforce development, and economic opportunity among minority populations and lack of access to healthy, affordable food choices.

Implementation: The City of Danville continues to work closely with chamber and business community to address job creation.

Neighborhood Conditions Related Impediments

Impediment No. 9: Limited number of affordable housing units and resources to assist low income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.

The City will continue efforts in providing volunteer-based initiatives and current activities will continue to expand volunteer activities as funds are available.

Public Policy Related Impediments

Impediment No. 10: Increased public awareness of fair housing rights and local fair housing legislation and local enforcement should be evaluated. The City of Danville has not enacted local Fair Housing Law deemed substantially equivalent to the federal act, offering similar rights, remedies, and protections to the protected classes afforded protections under the federal law. The City does not provide for local enforcement and uses the federal government and State agencies for enforcement.

Implementation: The City continued increasing fair housing education and outreach in an effort to raise awareness and increase the effectiveness of its local fair housing ordinances. The City continued to target fair housing education and outreach to the rapidly growing Hispanic and immigrant populations.

3. How the experience of program participation(s) in implementing past goals has influenced the selection of current goals.

Many of the participants for this AI are the same persons and agencies that participated in the AI in 2015. Some have been working in partnership with the City to address these issues and goals identified at that time. These are difficult goals to address and many require additional resources. We are therefore focusing on how the City and our partners can identify additional resources or alternative approaches to implementing the goals.

VII. Fair Housing Impediments Goals and Priorities for 2019 AI

2019 Analysis of Impediments to Fair Housing Choice

Impediments to fair housing choice are detailed in Section Six of the 2019 Analysis of Impediments report. The impediments identified draws on information collected and analyzed to provide a detailed analysis of fair housing impediments in Danville. Impediments were divided into five major categories: Real Estate Impediments; Public Policy Impediments; Neighborhood Conditions as Impediments; Banking, Finance, and Insurance Related Impediments; and Socioeconomic Impediments. For each impediment identified, issues and impacts are detailed. Remedial actions are recommended, when appropriate, to address each impediment. Some of the remedial actions and recommended goals are conceptual frameworks for addressing the impediments. The goals require further research, analysis, and final program design by the City of Danville for implementation.

Goals and Remedial Activities designed to address impediments

The major focus of the recommended remedial actions and goals are centered on creating partnerships, identifying new federal resources and leveraging private funding needed to enhance the jurisdiction's ability to increase its supply of affordable housing and better meet the needs of low-income and moderate-income households. Other remedial actions are recommended as a means of reversing the negative and sometimes disparate impacts of the market conditions and mortgage lending trends that adversely and disproportionately impact minorities and members of the protected classes under the fair housing act. These include sub-prime lending, foreclosures, credit and collateral deficiencies that impact loan origination rates, poverty, employment and income. The goals were prioritized by the City with input from the public and the details of the identified goals and remedial actions are presented in this section of the report.

The contributing factors pertaining to each identified impediment were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor. The contributing factors are grouped by the same issues that organize the AI, and some factors may appear for multiple issues.

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

Goal 1: De-concentration of Poverty, Race/Ethnicity, and Public and Assisted Housing.

Contributing Factors:

Location and type of affordable housing

The availability of affordable units in a range of sizes

Lack of affordable, accessible housing in range of unit sizes

Fair Housing Issues:

Segregation/Integration R/ECAPs

Disparities in Access to Opportunity

Disproportionate Housing Needs

Transforming Concentrated Areas into Opportunity Areas

Metrics, Milestones for Achievement:

Request HUD Increase Section 8 FMR's to enhance utilization of HCVs in non-R/ECAP areas;

Request HUD funding for Choice Neighborhood Program Implementation;

Lobby State legislature to amend LIHTC Funding Criteria to include a Location Criteria Policy that incentivizes developers' applications not to choose poverty and racial/ethnic concentrated census tracts to help reduce concentrated poverty, race and ethnicity;

Request HUD funding for Neighborhood Revitalization in R/ECAP areas and new housing development and investment in Opportunity Areas;

Request HUD provide funding to Incentivize Landlord Participation in Section 8 Voucher Program; and fund After School Learning Centers and Adult Literacy Programs in privately owned multifamily housing development.

Responsible Program Participant(s)

City of Danville, VA

Danville Housing Authority

Discussion

Fair housing is distinct from affordable housing. However, there is a great deal of overlap between the two issues. Fair housing experts and advocates, including those consulted in Danville indicate that the most prevalent barrier to fair housing is poor housing and neighborhoods in areas of concentrated poverty, low income and public and assisted housing. To address contributing factors related to a lack of affordable housing, the City and Danville Housing and Redevelopment Authority, private market and other public organizations to increase access to the supply and variety of affordable housing.

Goal 2: Expand supply of affordable housing, housing choice and access to financing.

Contributing Factors:

Location and type of affordable housing

The availability of affordable units in a range of sizes

Lack of affordable, accessible housing in range of unit sizes

Fair Housing Issues:

Appraisal Values,

Supply of Affordable Housing

Recapture of Adjudicated and abandoned properties for affordable housing

Metrics, Milestones for Achievement:

Continue to maintain a list of local publicly supported developments with expiring subsidies in order to identify partners and potential sources of funding for preservation.

Request City consider enacting Inclusionary Zoning regulations to generate additional affordable housing units. City staff will evaluate the impact on fair housing for residential development proposal.

Encourage City of Danville utilize incentives to encourage those that increase the supply of affordable housing in high opportunity areas and/or outside of “concentration areas.”

Encourage private landlords to increase participation in the Housing Choice Voucher program, particularly those in higher opportunity neighborhoods.

Implement Mortgage Subsidy; Property Acquisition \ Adjudication; Appraisal Exceptions; and City Infrastructure Replacement programs in support of affordable housing programs.

Responsible Program Participant(s)

City of Danville, VA

Danville Housing and Redevelopment Authority

Discussion:

Concentrated poverty, lower income, and public and assisted housing must be reduced in R/ECAP areas to address concentrations and improve the type and location of affordable housing. Deteriorated conditions replaced with access to quality affordable housing and goods and services. The City, Danville Housing and Redevelopment Authority, and private market will support increased supply of quality affordable housing.

Goal 3: Increase homeownership for low-income protected class members.

Contributing Factors

Location and type of affordable housing

The availability of affordable units in a range of sizes

Lack of affordable, accessible housing in range of unit sizes

Fair Housing Issues

Segregation/Integration R/ECAPs

Disparities in Access to Opportunity

Disproportionate Housing Needs

Disability and Access

Metrics, Milestones for Achievement

The City will continue to fund down payment assistance for qualified first-time homebuyers.

The City will continue to fund homebuyer education and will develop and launch a pilot program of financial literacy in in schools and college targeting 17 – 30 Year olds.

Responsible Program Participant(s)

City of Danville, VA and Local School Districts

Business, Real Estate and Finance Industries

Discussion

The City of Danville has a relatively low homeownership rate, especially among certain racial and ethnic groups. African American households have much lower homeownership rates than other racial/ethnic groups. Persons with physical disabilities also face difficulty in finding a unit that is already accessible or easily modified. Increasing homeownership for protected classes not only helps these households build wealth and access opportunity, it relieves pressure from the rental market. The City and nonprofit CHDOs will assist qualifying residents and low-income households achieve homeownership.

Goal 4: Improve transportation for low- income and disabled persons.

Contributing Factors

The availability, type, frequency, and reliability of public transportation

Limited affordability for transportation by seniors, disabled persons and lower income.

Location of employers and essential services not easily accessible.

Access to private transportation for persons with disabilities costly and sometimes limited availability.

Fair Housing Issues

Disparities in Access to Opportunity

Disability and Access

Metrics, Milestones for Achievement

Design and implement a CDBG funded Transportation Assistance Program for seniors and disabled persons to access essential services and increase mobility.

Identify key community asset or major employer currently underserved by transit service.

Responsible Program Participant(s)

City of Danville, VA

Discussion

Economical transportation is an essential element of daily city life. For many low-income households and members of the protected classes, the available transportation options in Danville are inconvenient or costly enough to be unreasonable choices. The City will work together with transportation agency and local employers to assess the current effectiveness and feasibility of additional public transportation in addressing the needs of the low-income and protected classes, and to effectively adjust service accordingly.

Goal 5: Enact Local Fair Housing legislation, and increase outreach and education and anti- discrimination investigation, enforcement, and operations

Contributing Factors

Local Fair Housing legislation needed to access resources for the City, and fair housing agencies and organizations to increase resources for education and enforcement.

Fair Housing Issues

Local Fair Housing Enforcement, Outreach Capacity, and Resources.

Metrics, Milestones for Achievement

Enact substantially equivalent fair housing legislation

Apply for FHIP and FHAP funding to support local initiatives.

Support increased funding to State and HUD- certified organization to conduct paired discrimination testing in the rental market.

Annually train city staff to refer callers about fair housing to the designated state and federal agencies. In addition, train all staff that interacts with the public in techniques to communicate with those with language and/or cultural barriers.

Responsible Program Participant(s)

City of Danville, VA

Discussion

Any effort to affirmatively further fair housing can only go so far without effective and efficient investigation and enforcement of discriminatory actions. However, resources for these activities are already limited and are only becoming more so. The City will ensure that discriminatory activity is properly referred to enforcement agencies for investigated by a trained agency. In addition, the City of Danville will evaluate and strive to improve the way they interact with the public in order to prevent unintentional barriers from occurring.

Goal 6: Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, landlords and owners of private rental housing, elected officials, and the general public.

Contributing Factors

Community opposition, NYMBYSM, lack of industry requirement for fair housing training.

Fair Housing Issues

Segregation/Integration

Publicly Supported Housing

Metrics, Milestones for Achievement

Advertising fair housing resources, where to file fair housing complaints and violations, and providing compliant filing procedures.

Continue to partner with local organizations such as lending institutions, attorneys, realtors, etc. to host a fair housing community forum annually. Continue to hold fair housing training and education for elected and appointed officials, and City staff.

Responsible Program Participant(s)

City of Danville, VA

Discussion

While fair housing education and outreach are constant needs in any jurisdiction, the City will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, design and construction professionals and the public with a focus on members of the protected classes. The City will focus on internal education and training to reduce the chances of

creating impediments to fair housing within their own organizations. The City will partner with state, regional and local organizations whose clients are hard to reach, protected class members, in an effort to help citizens better understand their rights provided under the Federal and State Fair Housing Acts and to report violations to fair housing.

Goal 7: Increase Housing Affordability, Homeownership, Resources for Affordable Housing, and Accessibility.

Contributing Factors

Financial Literacy

Limited Resources

Access to financing

Fair Housing Issues

Segregation/Integration

Limited Accessibility

Metrics, Milestones for Achievement

Consider enacting Energy Efficiency and Green Building standards; “Visitable” Housing Regulations in building codes.

Work with Financial Institutions, Real Estate Associations and Educational Institutions to design and implement local Financial Literacy / Life Skills programs as required curriculum for high school juniors and seniors.

Partner with local organizations such as lending institutions, attorneys, realtors, etc. to host a fair housing community forum annually. Hold an annual fair housing training for elected officials, appointed boards, and department staff.

Responsible Program Participant(s)

City of Danville, VA

Discussion

Fair housing education and outreach are constant needs, and the City will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, design and construction professionals and the public with a focus on members of the protected classes. The City will focus on internal education and financial literacy aimed at helping 18 to 30-year old reduce the chances of creating financial and credit related impediments to fair housing.

Goal 8: Increase Rehabilitation, Preservation, Sustainability of affordable housing and program efficiency.

Contributing Factors

Infrastructure to support housing development

Limited homebuyer resources to make housing affordable

Access to financing

Fair Housing Issues

Segregation/Integration

Limited Accessibility

Metrics, Milestones, and Timeframe for Achievement

Consider creating additional Volunteer Repair Programs – People Helping People and expanding others as a means for improving and preserving existing affordable housing, and corporate challenges for volunteer programs, compliance Store, and fix it clinics.

Responsible Program Participant(s)

City of Danville, VA

Discussion

Neighborhoods and housing most affordable to low- and moderate-income persons are experiencing decline. Programs and funded is needed to maintain existing housing, enhance the quality of life and amenities in aging neighborhoods, and to assist owners and renter with maintenance, repairs and affordability. Commercial corridor reinvestment is needed to provide quality goods and services and to improve entrances and access to neighborhoods.

Goal 9: Increase Economic Development, Job Creation, Small Business Entrepreneurial Opportunities and Commercial Corridor Revitalization.

Contributing Factors

Limited Resources

Access to financing

Job that do not pay living wages or match the qualifications of the demographics of protected class members and those with limited education and skills.

Fair Housing Issues

Segregation/Integration

Lack of Living Wages

Lack of Income

Metrics, Milestones for Achievement

Commercial Corridor Reinvestment

Micro Business Enterprise Development

Economic Development – Workforce Readiness collaboration

Responsible Program Participant(s)

City of Danville, VA

Discussion

Employment opportunities for lesser skilled and lesser educated persons are limited. Many jobs do not pay living wages that support a person's ability to afford housing and housing related cost without paying more than 30% of their household income. The City and Chamber should continue to recruit industry and jobs that mirror these demographics in the workforce, encourage living wages, and support job training and education program that will help person become qualified for better paying jobs.

Goal 10: Expand Housing Types and Locations.

Contributing Factors

Limited Resources

Access to financing

Fair Housing Issues

Segregation/Integration

Lack of housing types

Lack of Income and affordability

Metrics, Milestones, and Timeframe for Achievement

Live-Work Housing

Lower cost Cluster or Cottage Housing for seniors

Shared – Intergenerational Housing

Affordability housing for at risk populations including former felons and persons existing jail or prison; homeless and those at risk of becoming homeless, seniors aging in place.

Housing Reinvestment in R/ECAP Areas

Responsible Program Participant(s)

City of Danville, VA

Discussion

Residential and Commercial reinvestment is needed neighborhoods, to provide affordable alternative housing types, to provide quality goods and services, and to improve entrances and access to neighborhoods.

Goal 11: Address issues associated with efforts to recover from Hurricane Michael.

Contributing Factors

Infrastructure to support housing development

Limited homebuyer resources to make housing affordable

Access to financing and federal resources for recovery

Post Hurricane Michael property values and risk of permanent displacement of population.

Fair Housing Issues

Segregation/Integration

Limited Housing and Access to Financing for repair and replacement of Housing.

Increase poverty due to loss of jobs and limited economic development opportunities

Metrics, Milestones, and Timeframe for Achievement

Consider creating additional Volunteer Repair Programs – People Helping People and expanding others as a means for improving and preserving existing affordable housing, and corporate challenges for volunteer programs, compliance Store, and fix it clinics.

Petition the federal government, if needed, to make the Buyout – Acquisition Hurricane Recovery Program more flexible to support benefits for Acquisition Program that mirror Buyout Program provisions by allowing owners to receive pre-Hurricane Michael appraised value for their properties. Currently regulations limit Acquisition Program to Post-Michael values.

Responsible Program Participant(s)

City of Danville, VA

Discussion

In October 2018 the worst of the remnants of Hurricane Michael brought devastating flooding and destruction to housing units in Danville. Many units were damaged or destroyed. Neighborhoods and housing most affordable to low- and moderate-income persons were already experiencing decline. Programs and funded is needed to maintain existing housing, enhance the quality of life and amenities in aging neighborhoods, and to assist owners and renter with maintenance, repairs and affordability. Commercial corridor reinvestment is needed to provide quality goods and services and to improve entrances and access to neighborhoods.