

CITY OF BLOOMINGTON

Housing and Neighborhood Development

2019 - 2024

ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE

November 2019

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Executive Summary

The City of Bloomington has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds affirmatively further fair housing. As a HUD entitlement community, Bloomington must comply directly with HUD rules and regulations designed to uphold the Housing and Community Development Act of 1974, as amended. As a result, the City is charged with the responsibility of conducting its CDBG and HOME programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government, which receive federal funds through the City.

Entitlement communities that receive CDBG and HOME funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

As an entitlement community, the City has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

The following observations were noted throughout the AI. These issues are based on the primary research collected and analyzed and the numerous interviews and focus group sessions conducted for this report. They help to establish context for the impediments to fair housing choice.

1. Bloomington's minority residents comprise nearly 20.0% of the City's population has grown significantly increasing by 82.9% since 2000.

One of the major contributing factors to this growth is the University of Indiana's Bloomington Campus, which is attended by over 40,000 students across a range of diverse backgrounds.

2. An area of minority concentration is any census tract where the population is at least 25.9% racial or ethnic minorities.

There are four census tracts in Bloomington that meet this threshold.

3. The median household income in 2017 for Black households (\$27,232) was equivalent to only 76.4% of the median household income of White households (\$35,643). Asian households are disproportionately represented in the lowest income group, due to a large proportion of them being students, with almost 65% earning less than \$25,000 annually.

Stakeholders reported that income data reported by the census may be misleading due to the large student population.

4. The City has four census tracts that are classified as areas impacted by concentrations of minority and LMI residents.

Two of the City's four areas impacted by the overlapping concentration of LMI and minority residents are likely comprised primarily by students due to their proximity to the University. The other two, however, are impacted in the more traditional sense – minority concentrations affected by high rates of poverty that tend to be intergenerational—rather than merely low-income students who will receive higher incomes after getting a college degree.

5. In Bloomington, 9.8% of the population reported at least one disability in 2017. The poverty rate for those with a disability is 35.0% compared to 37.8% of those with no disability.

Generally, it is expected that the poverty rate among the disabled population to be higher than those without a disability, however, it is possible that among the University's more educated workforce is a larger number of disabled persons. These persons would drive the poverty rate of the disabled population lower.

6. Families comprised over half of households in the County but only 39.4% of households in Bloomington – likely due to the large university population. From 2000 to 2017, the percentage of family households increased by 15.2%.

Married-couple households with children fell by 2.1% in Bloomington, however, Female-headed households with children in Bloomington grew by 28.7% and male-headed households with children grew by 45.0%.

7. In Bloomington, 12.1% of residents are foreign-born. In 2017, almost 53% of children under 18 were living below 200% of the poverty level. Of those, 19.4% were children living in homes with at least one foreign-born parent.

The largest foreign language group that does not speak English "very well" is Chinese, which is spoken by 2.57% of city residents. Spanish is the second largest percentage at 0.99%. Korean, Japanese, and other Asian languages combined account for 1.47% of the population.

8. Blacks are more likely than other groups to be unemployed in Bloomington with an unemployment rate of 15.3% compared to 7.4% for Whites.

Additionally, Female workers are more likely to be unemployed than males, facing an unemployment rate of 8.4% compared to males at 7.1%.

9. The City has a vacancy rate of 9.5%, 59.0% of which is its rental stock, which is likely the result of a large, seasonal student population.

The majority of Bloomington's housing stock is renter-occupied, multi-family units. These types of units can provide a more affordable option for residents, particularly in impacted areas. Multi-family units comprise over three-quarters of the rental market.

10. The proportion of Blacks, Asians, and Hispanics who are homeowners increased from 2000 to 2010.

In 2017, the proportion of Blacks, Asians, and Hispanics homeowners fell slightly from their high-water marks in 2010. Black homeownership declined from 15.7% to 15.4% while Asian homeownership dropped from 15.7% to 14.8%, and Hispanic homeownership dropped from 21.3% to 20.6%.

- 11. The rate of foreclosure in Bloomington was 0.01% in 2018 or 1 in every 1,919 homes which is lower than the Indiana statewide rate of 0.03%.**

With fewer foreclosures than what is occurring across much of the rest of Indiana, Bloomington has a market that appears to have recovered from the foreclosure crisis that affected much of the country after the 2008 housing crisis.

- 12. In 2010, the most current year available, over 60.0% of Black households and Hispanic households, and over 50.0% of Asian households were families with three or more persons compared to 46.5% of White households.**

In Bloomington, only 25.6% of rental units had three or more bedrooms in 2017, down slightly from 26.4% in 2010. By contrast, two-bedroom units increased slightly from 2010 to 2017.

- 13. Real median housing value fell 2.7% from 2000 to 2017 in Bloomington, while median gross rent rose 7.7% as a result of increasing demand for student rental housing.**

Median household income in Bloomington decreased 9.1%.

- 14. Bloomington's inventory of units renting for less than \$700 a month declined by 3,315 units between 2010 and 2017.**

In contrast, the higher end of the rental market expanded by 4,366 units renting for more than \$700 a month. Coupled with a declining median household income, the rental housing market is becoming more out of reach for lower income households.

- 15. In Bloomington, the FMR for a two-bedroom apartment in 2018 was \$920. The annual income required to make this rent affordable (no more than 30% of monthly income) is \$36,800.**

This required an annual income of 111.0% of the City median household income.

- 16. A household earning the median income in Bloomington can only afford to purchase a house that is 61.1% of the median valued home in Bloomington. This figure is slightly higher for the median earning White household (66.1%), but decreases significantly for Black (49.1%), Asian (14.2%), and Hispanic (56.5%) households.**

The income needed for the median valued home in Bloomington to be considered affordable is at least \$52,080. The City's median income is 63.7% of this amount. Black household income is 52.3% of this amount and Hispanic household income is 59.3%.

- 17. Generally, the most common of the four housing problems is cost burden – spending more than 30% of household income on housing.**

More than half of renters were cost burdened (61.1%). Black households are disproportionately more likely to be cost burdened at 72.4% of renters, however, 63.3% of White renters and 56.9% of Hispanic renters were also cost burdened.

Based on these observations, and the entirety of this report, the following Fair Housing Action Plan is recommended.

- 1. Many of the City's affordable housing options are located inside areas impacted by both concentrations of LMI and minority residents.**

All of the City's public housing units are located in impacted areas, which likely serves to increase the concentration of minorities and low-income residents. In addition, stakeholders stated Housing Choice Vouchers (HCV) are generally only accepted by a few landlords within the City, which leads HCV users to find housing outside of Bloomington or to focus their housing search within the few neighborhoods where vouchers are accepted.

The City invests some of its CDBG funds in the impacted areas for housing activities such as rehabilitation. However, opportunities for new affordable housing outside of these neighborhoods will be identified in efforts to expand housing choice for members of the protected classes.

Proposed Action 1: The City will include a map of impacted areas in its local HOME application process and strongly encourage development of new affordable housing outside of impacted neighborhoods.

Proposed Action 2: The City will seek to invest in new affordable housing projects outside of impacted areas by providing additional HOME funds.

2. The City's Language Access Plan is out of date.

The City's Language Access Plan provides sufficient language access resources for Spanish-speaking persons; however, a review of the most recently available census data finds that the largest limited English proficiency population in the City is Chinese-speaking. While many of these residents are presumed to be college students, some may be eligible for City programs and services. In order to provide opportunities to this group, the City will expand its current language access resources to include offering language assistance for Chinese-speaking residents.

Proposed Action 1: The City will conduct a new four factor analysis to identify additional resources that may be needed for its LEP Chinese-speaking population who may be eligible for programs and services. The City will then take steps to provide those resources.

3. Development of new and affordable multi-family housing is difficult for a variety of reasons and has restricted the amount and location of new housing.

The City's population has grown 20.7% from 2000 to 2017, however, it has been unable to aggressively expand the amount of land available to accommodate this growing population with diminishing land available for new development. Local builders conveyed that rising land costs have made affordable housing development nearly impossible from a fiscal standpoint. With such high land costs, the City needs to be prepared to support the purchase of land as part of the development process in order to build more affordable housing. This could be accomplished with the establishment of a Community Land Trust.

A community land trust (CLT) is a non-profit entity with part or all of the board appointed by the Mayor and/or City Council that purchases land to be owned by the City. The CLT leases this land to developers, often for a long period such as 99 years for a low fee under the stipulation that all new units developed will be affordable. A community land trust (CLT) is a nonprofit organization that acquires land, usually through donation or purchase, for the intent of creating new affordable housing. This tool offers a more feasible path to affordable housing development because the cost of land, which the CLT owns for a long period or in perpetuity, is removed from the total housing development costs. Using such a tool will allow the City to take a more proactive role in shaping Bloomington's future development and ensuring affordable housing is a key element. This structure removes the high cost of land from the total development costs, making it more attractive for development.

The location of affordable housing development is restricted by Bloomington's zoning map. The majority of Bloomington's residential land is zoned for single-family use. While there are large sections of the City that allow some mixed-use, multi-family development, stakeholders were concerned that most of these units were developed specifically for college students and are unaffordable to low-income residents. New development is also restricted by the presence of NIMBYism where residents are concerned with neighborhood character and historical preservation. While these are not necessarily superficial concerns, they cannot be allowed to

entirely restrict the development of new housing in a City where the population is increasing and land availability is severely limited. In order to overcome this problem, the City will work to identify parcels and increase the amount of land available for affordable multi-family development available for non-student households.

Proposed Action 1: The City will work to establish and capitalize a community land trust with the purpose of acquiring land for affordable housing development with a long-term period of affordability.

Proposed Action 2: The City will work to identify some single-family centric zoning districts to allow for increased density and the development of multi-family housing.

4. Public transportation limits housing choice among the protected classes.

While the City's Comprehensive Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing fair housing opportunities.

Stakeholders expressed that transportation is one of the largest barriers to housing choice. Residents who are dependent on public transportation for access to employment and necessities like groceries must live near a bus stop. Stakeholders reported that it often takes up to three hours to do something as simple as purchase groceries when depending on public transit due to frequency of bus service and bus routes. A lack of evening and Sunday service reduces employment opportunities for residents who rely on public transit and are employed or seeking employment in an industry that is primarily driven by shiftwork and weekend hours.

Stakeholders are also concerned that the City's transit system uses metrics that do not fully capture what would be considered success from a rider's perspective, such as passenger miles and wait times at bus stops. Without these metrics, the transit system will continue to underserve those most dependent on it for access to other areas of the City. While the Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing housing choice for all residents. The City's next update to the Comprehensive Plan needs to include policies that will coordinate public transit with current and planned affordable housing and the development of metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores and health care.

Proposed Action 1: The City will work with the transit authority to develop metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores and health care.

Proposed Action 2: The City's next update to the Comprehensive Plan will include procedures to coordinate public transit with existing and planned affordable housing.

5. Bloomington's regulation of group homes is not consistent with fair housing laws.

Bloomington's Unified Development Ordinance (UDO) allows group care homes in all districts; however, no group care home may be located less than 3,000 feet from any other group care

home. By putting a distancing requirement on group care homes, this provision of the UDO is inconsistent with fair housing law.

Proposed Action 1: The City will amend the UDO's regulation of group homes to eliminate the distancing requirements between group care homes.

6. The City lacks certain fair housing programs that could be leveraged to more affirmatively further fair housing.

While Bloomington Human Rights Commission (BHRC) has many fair housing activities, including outreach, education, and investigation of complaints, it has not conducted any paired testing recently. In recent correspondence with HUD, it was strongly suggested that paired testing be conducted. BHRC will work to identify a qualified housing enforcement organization to conduct paired testing in Bloomington in an effort to identify discriminatory practices in the rental housing market.

The City also has a rental inspection program where landlords must register and be inspected every three to five years to prevent dangerous and unsanitary living conditions for tenants. It also requires landlords provide tenants' rights and responsibilities forms to be signed by new tenants. The rental inspection program is fair housing activity in that it is a City sponsored program implemented to ensure that lower income residents are not deprived of safe, livable and affordable housing. Members of the protected classes (minorities, people with disabilities, families with children, etc.) comprise a large segment of rental households in Bloomington. The City will add mandatory fair housing training to the landlord registry – either during a landlord's initial registration or to occur periodically – and provide updated fair housing educational material during each inspection. Landlords will also be required to provide fair housing educational material to new tenants. This will help ensure both landlords and tenants are educated about their fair housing rights and responsibilities.

Proposed Action 1: BHRC will engage a qualified housing enforcement organization to conduct paired testing in an effort to identify discriminatory practices in the rental housing market.

Proposed Action 2: The City will add fair housing educational elements to its landlord registry program such as training for landlords and the provision of educational materials to tenants by landlords.

7. Income and credit were major factors in mortgage approvals. While not directly linked to race, these are factors that disproportionately affect minorities.

Over half of mortgage applications that are denied by lending institutions are denied due to a high debt-to-income ratio and poor credit history. Low-income home buyers were also more likely to receive high-cost loans.

Proposed Action 1: The City will develop partnerships with HUD-certified housing counselors and local lenders to offer homebuyer education and financial literacy programs.

1. Introduction

A. Introduction to Analysis of Impediments

The City of Bloomington has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds affirmatively further fair housing. As a HUD entitlement community, Bloomington must comply directly with HUD rules and regulations designed to uphold the Housing and Community Development Act of 1974, as amended. As a result, the City is charged with the responsibility of conducting its CDBG and HOME programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government, which receive federal funds through the City.

Entitlement communities that receive CDBG and HOME funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

Under federal law, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside impacted areas, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development

(HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As an entitlement community, the City has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in terms of implementing fair housing initiatives will be judged and recorded.

2. Demographic Information

A. Demographic Profile

i. Population Trends

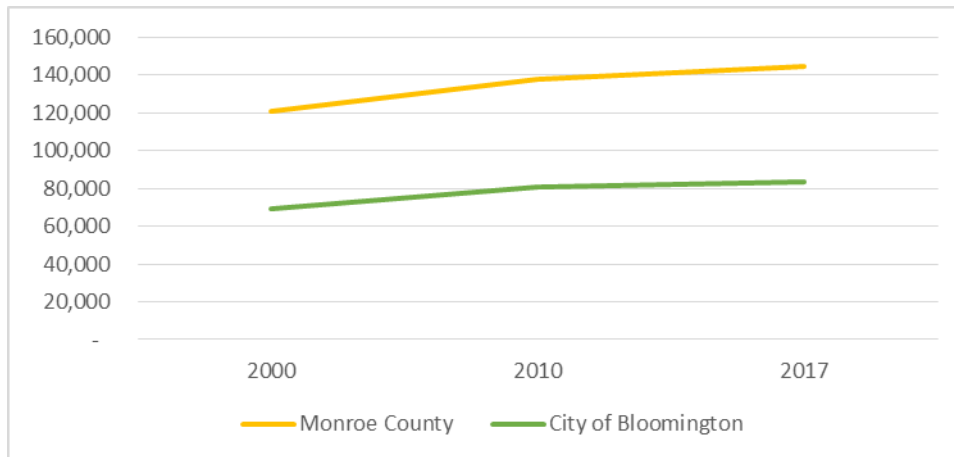
The population of Bloomington has increased by more than 20% since 2000, outpacing the state's growth of 8.8% during that time. The fastest period of growth occurred between 2000 and 2010 when Bloomington's population increased 16% from just over 69,000 to 80,405. The City experienced an increase of over 3,000 residents between 2010 and 2017. Since 2000, Bloomington's population grew 20.7%, slightly outpacing the County's growth of 19.8%. The County's primary source of population growth was Bloomington which added 60.1% of Monroe County's new residents from 2000 to 2017.

Figure 2-1
Change in Population, 2000 – 2017

	2000	2010	2017	% Change 2000 - 2017
Indiana	6,080,485	6,483,802	6,614,418	8.8%
Monroe County	120,563	137,974	144,436	19.8%
Bloomington	69,291	80,405	83,636	20.7%

Source: U.S. Census Bureau, Decennial Census (P001); 2013 – 2017 American Community Survey (B01003)

Figure 2-2
Population Trends, 2000 – 2017



Source: U.S. Census Bureau, Decennial Census (P001); 2013 – 2017 American Community Survey (B01003)

Both Bloomington and Monroe County have majority White populations – Bloomington’s population is 78.4% and Monroe County’s is 84.1% White. Bloomington’s minority residents comprise nearly 20.0% of the City’s population compared to Monroe County where racial or ethnic minorities account for 14.0% of the population. Asians are the largest minority group in the City and County comprising 9.6% of Bloomington’s population and 6.3% of the County’s. Blacks and Hispanics account for 4.2% of Bloomington’s population. This is compared to the County where Hispanics represent 3.3% of the population and Blacks 3.0%.

The minority population in Bloomington has grown significantly – contributing to most of the County’s minority population growth – increasing by 82.9% since 2000. One of the major contributing factors to this growth is the University of Indiana’s Bloomington Campus, which is attended by over 40,000 students across a range of diverse backgrounds. The City’s Asian and Hispanic populations grew the fastest at rates of 119.5% and 102.6%, respectively. The University’s largest minority group on the Bloomington campus is Asian with 2,529 students or 31.4% of the City’s and 27.7% of the County’s entire Asian populations.¹ Black population growth rates were similar in the City and County at 21.8% and 23.2%, respectively. Growth of the White population was also similar growing at 10.4% in Bloomington and 12.2% in Monroe County.

Figure 2-3
Change in Population by Race, 2000 – 2017

	Total Population	White*	Minority				
			Black	Asian/Pacific Islander	All Other**	Hispanic	Total Minority
2000							
Indiana	6,080,485	85.8%	8.3%	1.0%	1.3%	3.5%	14.2%
Monroe County	120,563	89.8%	3.0%	3.4%	2.0%	1.9%	10.2%
Bloomington	69,291	85.7%	4.2%	5.3%	2.3%	2.5%	14.3%
2010							
Indiana	6,483,802	81.5%	9.1%	1.6%	1.9%	6.0%	18.6%
Monroe County	137,974	86.1%	3.3%	5.3%	2.5%	2.9%	14.0%
Bloomington	80,405	81.1%	4.6%	8.0%	3.0%	3.5%	19.1%
2017							
Indiana	6,614,418	79.8%	9.1%	2.1%	2.3%	6.7%	20.2%
Monroe County	144,436	84.1%	3.0%	6.3%	3.2%	3.3%	15.9%
Bloomington	83,636	78.4%	4.2%	9.6%	3.6%	4.2%	19.1%
% Change 2000 - 2017							
Indiana	8.8%	1.2%	19.5%	131.1%	83.6%	106.0%	54.9%
Monroe County	19.8%	12.2%	23.2%	123.2%	94.9%	114.7%	87.1%
Bloomington	20.7%	10.4%	21.8%	119.5%	88.0%	102.6%	82.9%

*All races are of non-Hispanic ethnicity

** All Other includes Native American, Other, and two or more races.

Source: U.S. Census Bureau, Decennial Census (P4); 2013 – 2017 American Community Survey (B03002)

¹ IStart. (n.d.). Retrieved May 22, 2019, from <https://istart.iu.edu/dashboard/index.cfm?graph=studentTopTenCountries&isLoaded=yes>

Figure 2-4
Monroe County: Racial/Ethnic Minority Characteristics, 2000 – 2017

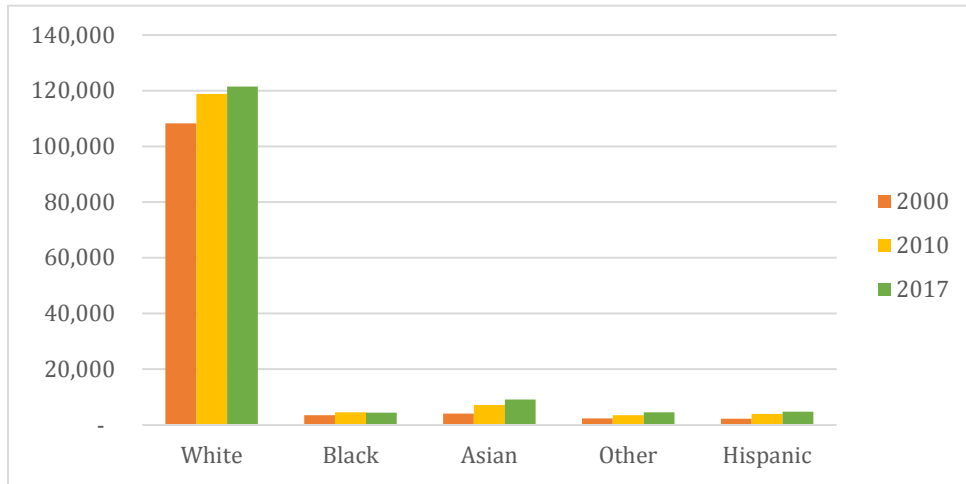
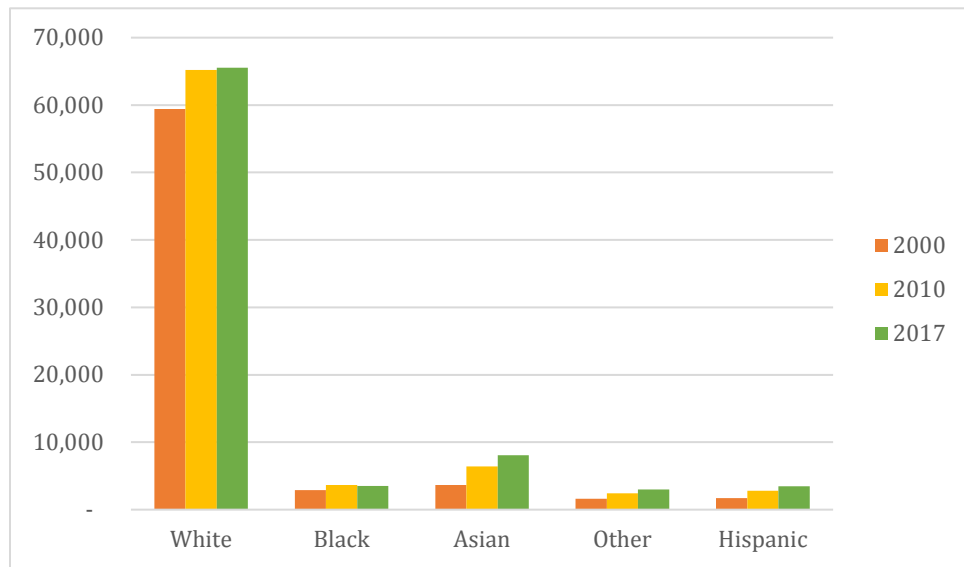


Figure 2-5
Bloomington: Racial/Ethnic Minority Characteristics, 2000 - 2017



Bloomington's minority residents comprise nearly 20.0% of the City's population has grown significantly increasing by 82.9% since 2000.

One of the major contributing factors to this growth is the University of Indiana's Bloomington Campus, which is attended by over 40,000 students across a range of diverse backgrounds.

ii. Areas of Racial and Ethnic Minority Concentration

Often, an area of concentration of minority persons is defined as a census tract in which the minority population is ten percentage points higher than the jurisdiction's overall minority population. Due to the significant minority student population living near Indiana University and the census tracts that cross the boundary between Bloomington and Monroe County, this AI will use the minority composition of the County as a base to define an area of minority concentration. The County was comprised of 15.9% minorities therefore an area of minority concentration is any census tract where the population is at least 25.9% racial or ethnic minorities.

There are four census tracts in Bloomington that meet this threshold as illustrated on Map 1 on the following page. The composition of each census tract is listed in Figure A-1 in the Appendix where blue highlights signal an area of minority concentration. Census tract 2.01 has a population mix that designates it an area of minority concentration, however, it is part of Indiana University's campus and not under the purview of Bloomington. Census tracts 9.01 and 9.04 are areas of minority concentration but are primarily neighborhoods of student housing and not long-term residents. For these reasons, the City is concentrating more of its fair housing policies towards the two other areas of minority concentration in census tracts 6.01 and 11.01.

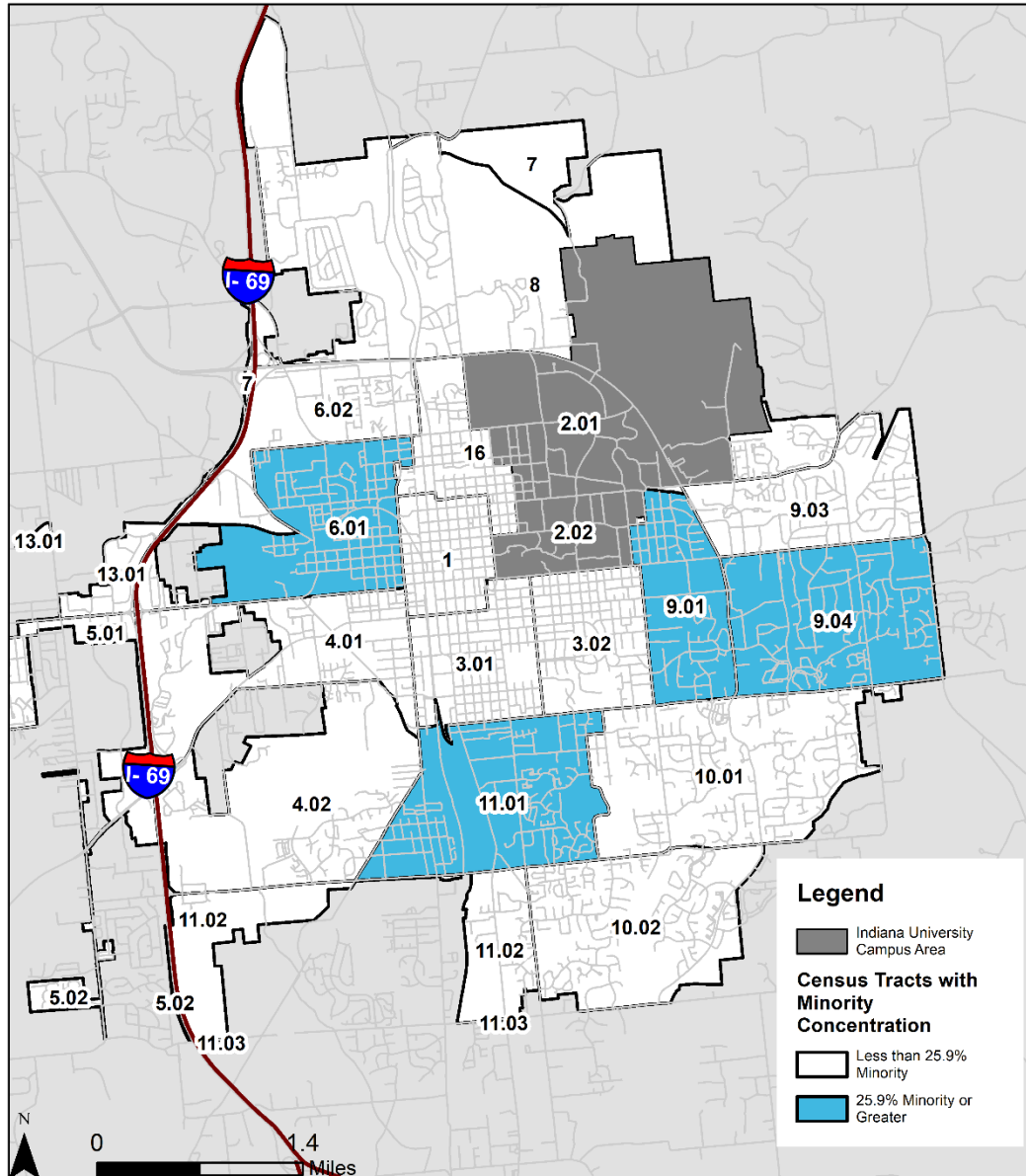
An area of minority concentration is any census tract where the population is at least 25.9% racial or ethnic minorities.

There are four census tracts in Bloomington that meet this threshold.

Map 1 **Areas of Racial and Ethnic Concentration, 2017**



City of Bloomington, Indiana
 2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

iii. Residential Segregation Patterns

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

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity (DI). This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The DI is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.² The index is typically interpreted as the percentage of a specific racial or ethnic population that would have to move in order for a community or neighborhood to achieve full integration. A DI of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation. The DIs for Bloomington's largest racial and ethnic groups are displayed below.

Figure 2-6
Dissimilarity Index, 2017

	2017 DI with White Population	Population	% of Total
White	-	65,546	78.4%
Black	31.6	3,529	4.2%
Asian	34.6	8,062	9.6%
Hispanic*	24.4	3,489	4.2%

** Hispanic ethnicity is counted independently of race*

Source: 2013 – 2017 American Community Survey (B03002)

Blacks and Asians are considered moderately segregated according to the DI. About a third of both populations would need to move to new neighborhoods in order to be fully considered fully integrated. Hispanics are experiencing a low degree of segregation.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 * ABS [(b/B) - (a/A)]$, where **b** is the subgroup population of a census tract, **B** is the total subgroup population in a city, **a** is the majority population of a census tract, and **A** is the total majority population in the city. **ABS** refers to the absolute value of the calculation that follows.

iv. Race/Ethnicity and Income

Household income is one of several factors that determine a household's ability to qualify for a mortgage. It is also a determining factor in what type of rental housing a household will be able to obtain. The median household income in 2017 for Black households (\$27,232) was equivalent to only 76.4% of the median household income of White households (\$35,643). Blacks also face significantly higher poverty rates than Whites. Compared to minorities countywide, minorities living in Bloomington experience higher poverty rates and lower incomes. The median household income for Asians is the lowest by a wide margin with a median household income of only \$9,909 in 2017. This is likely caused, in part, by the large university population in Bloomington where almost one-third of Asian residents are students.

After adjusting for inflation, median household income increased in Bloomington (8.1%) and Monroe County (7.0%) from 2010 to 2017. All minority groups experienced increased incomes except Asians which decreased 35.3% in Bloomington and 23.1% in Monroe County. The median household income grew the most for Hispanics increasing by 44.1% in the City and 17.7% in the County. The number of Asian households in poverty increased by 17.4% in Bloomington and 19.9% in Monroe County.

The difference in income between minority groups is illustrated in the table and graphs below. Almost 75% of Black households and over 70% of Hispanic households earn in the lowest two income groups. Asian households are disproportionately represented in the lowest income group, with almost 65% earning less than \$25,000 annually. Stakeholders reported that income data reported by the census may be misleading due to the large student population. Many students will have low incomes recorded in by the American Community Survey which will pull down the City's median, but in reality, many of these students are primarily supported by their parents and/or loans while attending the University.

Figure 2-7
Median Household Income and Poverty by Race/Ethnicity, 2010 -- 2017

	Median Household Income 2010 (in 2017 dollars)	Poverty Rate 2010	Median Household Income 2017	Poverty Rate 2017
Monroe County	\$42,713	25.5%	\$45,689	24.7%
White	\$45,134	23.4%	\$48,788	22.1%
Black	\$29,220	40.4%	\$31,263	39.5%
Asian	\$17,371	51.1%	\$13,354	52.9%
Hispanic*	\$30,847	33.4%	\$36,306	28.2%
Bloomington	\$30,699	38.8%	\$33,172	37.5%
White	\$32,978	36.7%	\$35,643	34.7%
Black	\$26,218	51.8%	\$27,232	46.8%
Asian	\$15,319	53.9%	\$9,909	57.1%
Hispanic*	\$21,424	46.6%	\$30,865	35.8%

* Hispanic ethnicity is counted independently of race

Source: U.S. Census Bureau, 2006 – 2010 & 2013 – 2017 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B, B17001D, B17001I)

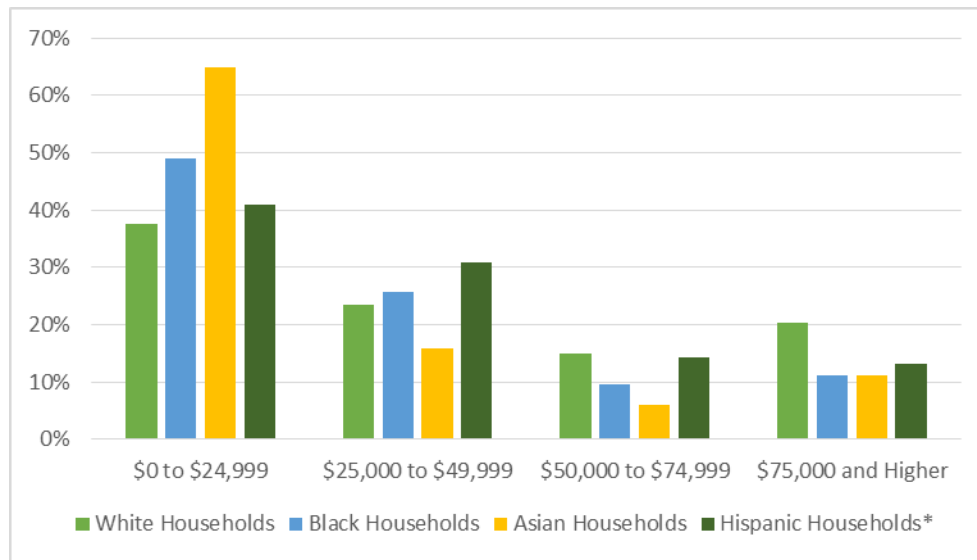
Figure 2-8
Household Income Distribution by Race, 2017

	Total	\$0 to \$24,999		\$25,000 to \$49,999		\$50,000 to \$74,999		\$75,000 and Higher	
		#	%	#	%	#	%	#	%
Monroe County	55,014	16,464	29.9%	12,905	23.5%	9,054	16.5%	14,271	25.9%
White Households	49,035	13,461	27.5%	11,597	23.7%	8,479	17.3%	13,364	27.3%
Black Households	1,622	726	44.8%	433	26.7%	201	12.4%	201	12.4%
Asian Households	2,773	1,648	59.4%	460	16.6%	181	6.5%	384	13.8%
Hispanic Households*	1,370	481	35.1%	397	29.0%	198	14.5%	216	15.8%
Bloomington	30,569	12,440	40.7%	7,052	23.1%	4,256	13.9%	5,773	18.9%
White Households	25,643	9,646	37.6%	6,000	23.4%	3,868	15.1%	5,216	20.3%
Black Households	1,325	650	49.1%	340	25.7%	126	9.5%	148	11.2%
Asian Households	2,462	1,597	64.9%	389	15.8%	150	6.1%	277	11.3%
Hispanic Households*	1,016	415	40.8%	314	30.9%	145	14.3%	135	13.3%

* Hispanic ethnicity is counted independently of race

Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

Figure 2-9
Household Income Distributed by Race in Bloomington, 2017



The median household income in 2017 for Black households (\$27,232) was equivalent to only 76.4% of the median household income of White households (\$35,643). Asian households are disproportionately represented in the lowest income group, due to a large proportion of them being students, with almost 65% earning less than \$25,000 annually.

Stakeholders reported that income data reported by the census may be misleading due to the large student population.

v. Concentrations of LMI Persons

The CDBG Program includes a statutory requirement that at least 70% of the funds invested benefit low- and moderate-income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as the City of Bloomington. An area of LMI concentration is a census tract where at least 51% of residents are LMI. Of the City's 23 Census tracts, 14 qualify as areas of concentration of LMI persons. One of those LMI census tracts is part of the Indiana University campus and is likely composed entirely of students that attend the University. The composition of LMI persons in each census tract is listed in Figure A-2 in the Appendix. All areas of racial/ethnic minority concentration are also areas of concentration of LMI persons as illustrated in Map 2. These five census tracts, referred to as impacted areas are illustrated in red on Map 3.

Two of the City's four areas impacted by the overlapping concentration of LMI and minority residents are comprised primarily by students due to their proximity to the University. The other two, however, are impacted in the more traditional sense – minority concentrations affected by high rates of poverty that tend to be intergenerational—rather than merely low-income students who will receive higher incomes after getting a college degree. These two census tracts are located on the western and southern edge of downtown Bloomington and the other is on the eastern edge of the City.

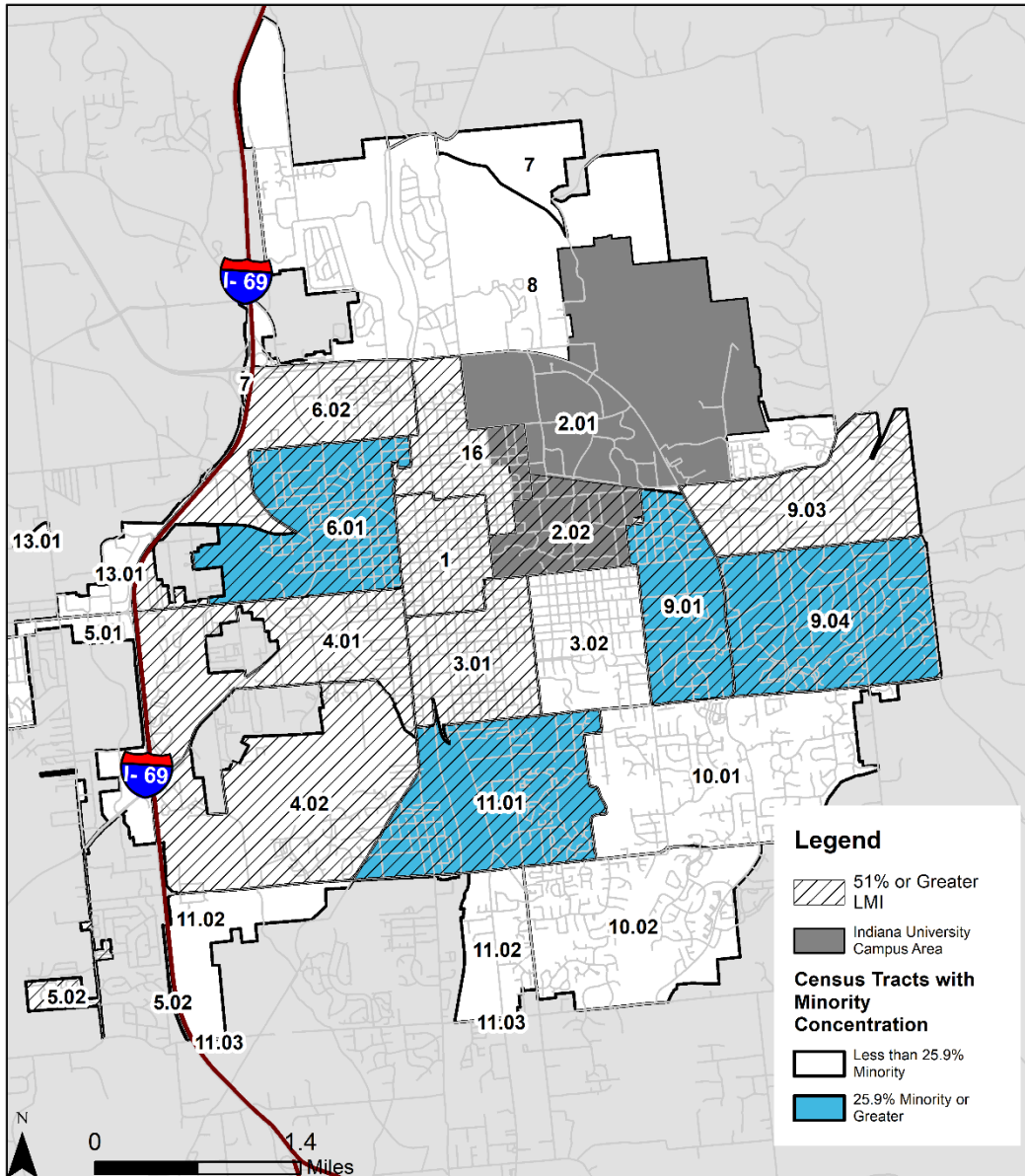
The City has four census tracts that are classified as areas impacted by concentrations of minority and LMI residents.

Two of the City's four areas impacted by the overlapping concentration of LMI and minority residents are likely comprised primarily by students due to their proximity to the University. The other two, however, are impacted in the more traditional sense – minority concentrations affected by high rates of poverty that tend to be intergenerational—rather than merely low-income students who will receive higher incomes after getting a college degree.

Map 2 Areas of LMI Concentration, 2017



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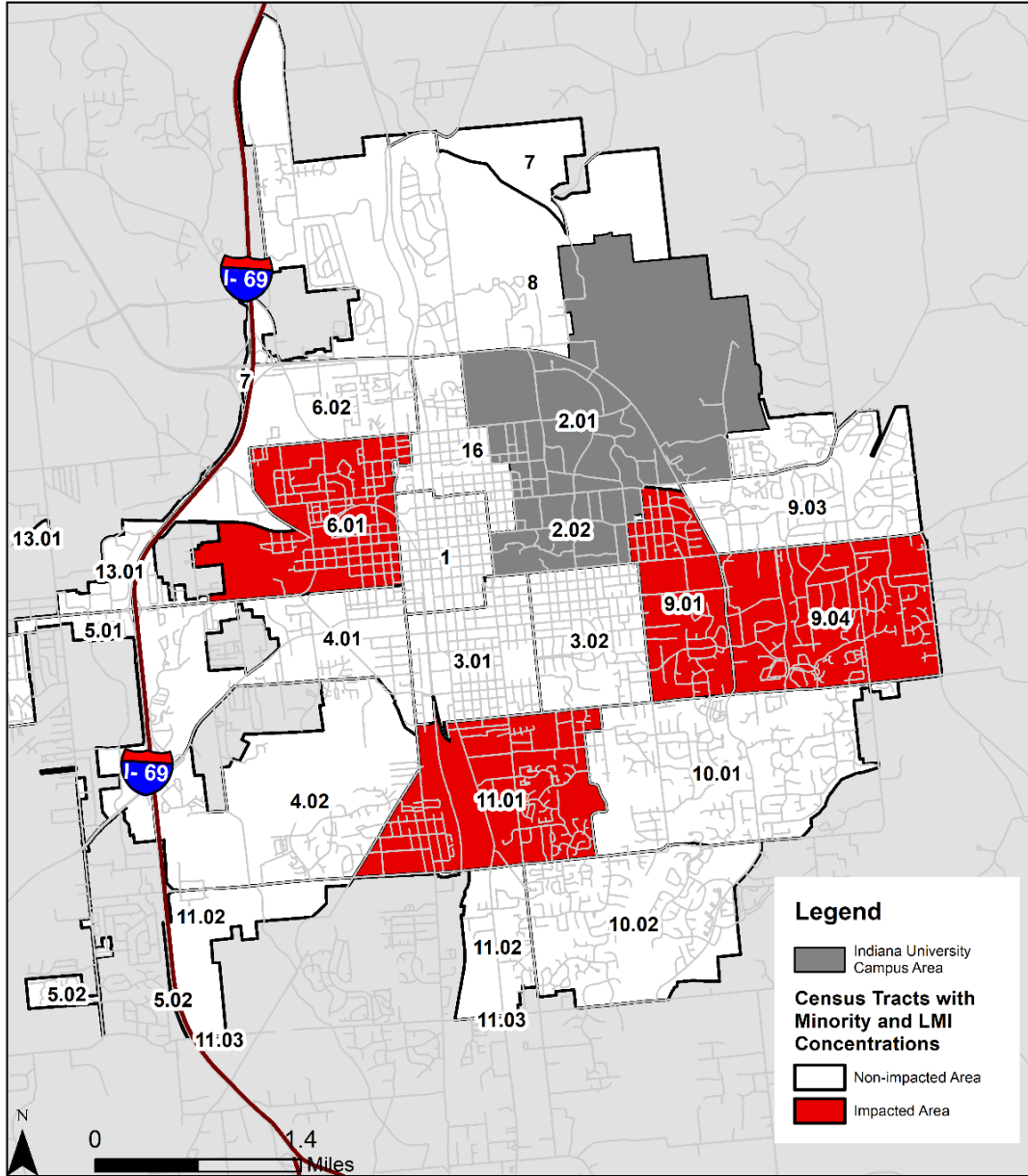


Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

Map 3 Impacted Areas, 2017



City of Bloomington, Indiana
2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

vi. Disability

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

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).

In Bloomington, 9.8% of the population reported at least one disability in 2017.³ The poverty rate for those with a disability is 35.0% compared to 37.8% of those with no disability.⁴ Generally, it is expected that the poverty rate among the disabled population to be higher than those without a disability. Due to the presence of the University, Bloomington’s disabled population is likely more educated than the national average and have higher paying jobs that are less likely to be affected by certain disabilities. This factor would lead to similar incomes and poverty levels between the disabled and non-disabled populations.

In Bloomington, 9.8% of the population reported at least one disability in 2017. The poverty rate for those with a disability is 35.0% compared to 37.8% of those with no disability.

Generally, it is expected that the poverty rate among the disabled population to be higher than those without a disability, however, it is possible that among the University’s more educated workforce is a larger number of disabled persons. These persons would drive the poverty rate of the disabled population lower.

vii. Familial Status and Income

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

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

Families comprised over half of households in the County but only 39.4% of households in Bloomington – likely due to the large university population. From 2000 to 2017, the percentage of family households increased by 15.2% in the City and 15.4% in the County. In the City, female-

³ U.S. Census Bureau, American Community Survey 2013 – 2017 (DP02)

⁴ U.S. Census Bureau, American Community Survey 2013 – 2017 (C18130)

and male-headed households increased by 42.3% and 41.9%, respectively, compared to 42.0% and 34.5% growth in the County.

Married-couple households with children fell by 2.1% in Bloomington, a trend shared by the County and State which both experienced decreases of 6.9% and 14.0%, respectively. However, Female-headed households with children in Bloomington grew by 28.7% and male-headed households with children grew by 45.0%. In Monroe County, female-headed households with children grew 32.1% and male-headed households with children grew 32.5%. Despite fast growth rates, female- and male-headed households with children only comprised 5.7% and 1.8% of households in Bloomington and 5.8% and 1.8% of households in the County. The large percentage of non-family and one-person households is likely due to the large student population.

Figure 2-10
Households by Type and Presence of Children, 2017

	Total Households	Family Households										Non-Family and 1-Person Households
		% of Total	Married-Couple Families			Female-Headed Households			Male-Headed Households			
			% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
2000												
Indiana	2,336,306	68.6%	53.6%	23.8%	29.8%	11.1%	6.9%	4.2%	3.9%	2.2%	1.7%	31.4%
Monroe County	46,898	52.7%	41.8%	17.5%	24.2%	8.1%	5.1%	2.9%	2.9%	1.6%	1.3%	47.3%
Bloomington	26,468	39.5%	29.2%	11.6%	17.6%	7.8%	5.2%	2.7%	2.5%	1.2%	1.2%	60.5%
2010												
Indiana	2,502,154	66.9%	49.6%	19.9%	29.7%	12.4%	7.3%	5.1%	4.9%	2.6%	2.3%	33.1%
Monroe County	54,864	49.8%	38.2%	14.4%	23.8%	8.1%	4.8%	3.3%	3.5%	1.8%	1.7%	50.2%
City of Bloomington	31,425	35.9%	25.3%	9.5%	15.8%	7.5%	4.7%	2.8%	3.1%	1.4%	1.6%	64.1%
2017												
Indiana	2,537,189	65.6%	48.8%	18.8%	30.0%	12.1%	7.0%	5.0%	4.7%	2.5%	2.2%	34.4%
Monroe County	55,014	51.9%	38.8%	13.9%	24.9%	9.8%	5.8%	4.0%	3.3%	1.8%	1.5%	48.1%
Bloomington	30,569	39.4%	26.7%	9.8%	16.9%	9.6%	5.7%	3.9%	3.0%	1.5%	1.5%	60.6%
Change 2000 - 2017	Total Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change
Indiana	200,883	3.8%	-1.1%	-14.0%	9.3%	18.0%	11.6%	28.4%	30.7%	24.3%	38.9%	19.0%
Monroe County	8,116	15.4%	8.9%	-6.9%	20.3%	42.0%	32.1%	59.5%	34.5%	32.5%	36.9%	19.5%
Bloomington	4,101	15.2%	5.7%	-2.1%	10.8%	42.3%	28.7%	68.5%	41.9%	45.0%	38.9%	15.7%

Source: U.S. Census Bureau, 2013–2017 American Community Survey (B19001)

Families comprised over half of households in the County but only 39.4% of households in Bloomington – likely due to the large university population. From 2000 to 2017, the percentage of family households increased by 15.2%.

Married-couple households with children fell by 2.1% in Bloomington, however, Female-headed households with children in Bloomington grew by 28.7% and male-headed households with children grew by 45.0%.

viii. Ancestry, Persons with LEP, and Poverty

It is illegal to refuse the right to housing based on place of birth or ancestry. In Bloomington, 12.1% of residents are foreign-born. In 2017, almost 53% of children under 18 were living below

200% of the poverty level. Of those, 19.4% were children living in homes with at least one foreign-born parent.⁵

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers.

Bloomington has small foreign language populations relative to the size of its overall population. The largest foreign language group that does not speak English “very well” is Chinese, which is spoken by 2.57% of city residents.⁶ Spanish is the second largest percentage at 0.99%. Korean, Japanese, and other Asian languages combined account for 1.47% of the population.

Figure 2-11
Five Largest Populations that Speaks English "Less Than Very Well" by Language Group, 2015

Language Group	#	%
Chinese	2,052	2.57%
Spanish	793	0.99%
Korean	664	0.83%
Other Asian languages (plus Japanese)	507	0.64%
Other Pacific Island languages	230	0.29%

Source: U.S. Census Bureau, 2011 - 2015 American Community Survey (B16001)

In Bloomington, 12.1% of residents are foreign-born. In 2017, almost 53% of children under 18 were living below 200% of the poverty level. Of those, 19.4% were children living in homes with at least one foreign-born parent.

The largest foreign language group that does not speak English “very well” is Chinese, which is spoken by 2.57% of city residents. Spanish is the second largest percentage at 0.99%. Korean, Japanese, and other Asian languages combined account for 1.47% of the population.

⁵ U.S. Census Bureau, American Community Survey 2013-2017 5-Year Estimates (B05010)

⁶ The most recent data available comes from the 2011 – 2015 American Community Survey (ACS).

ix. Protected Class Status and Unemployment

Blacks are more likely than other groups to be unemployed in Bloomington and the County with unemployment rates of 15.3% and 11.9%, respectively. Asians also face higher rates of unemployment with a rate of 8.5% in Bloomington and 8.4% in Monroe County. Only Hispanics have lower unemployment rates than Whites at 5.4% compared to 7.4% for Whites in Bloomington with similar trends in Monroe County. Female workers are more likely to be unemployed than males in both Bloomington and the County. Females face 8.4% unemployment in Bloomington compared to males at 7.1%. Rates are lower in the County at 6.8% and 5.8%, respectively.

All of the protected classes, with the exception of Hispanics, experienced higher unemployment rates than the overall City and County rates. Disproportionately higher unemployment and lower wages among the protected classes are major contributors to their lack of housing opportunities. It restricts their opportunities to housing that is close to employment, transit, and low-cost. Without these elements, they must find compromises that can significantly reduce their quality of life and even their ability to improve their opportunities in the future.

**Figure 2-12
Civilian Labor Force, 2017**

	Indiana		Monroe County		Bloomington	
	Total	%	Total	%	Total	%
Total CLF	3,326,494		76,649		43,402	
Employed	3,124,295	93.9%	71,839	93.7%	40,044	92.3%
Unemployed	202,199	6.1%	4,810	6.3%	3,358	7.7%
Male CLF	1,750,915		39,756		22,148	
Employed	1,642,766	93.8%	37,442	94.2%	20,572	92.9%
Unemployed	108,149	6.2%	2,314	5.8%	1,576	7.1%
Female CLF	1,575,579		36,893		21,254	
Employed	1,481,529	94.0%	34,397	93.2%	19,472	91.6%
Unemployed	94,050	6.0%	2,496	6.8%	1,782	8.4%
White CLF	2,845,636		67,742		36,466	
Employed	2,696,332	94.8%	63,679	94.0%	33,770	92.6%
Unemployed	149,304	5.2%	4,063	6.0%	2,696	7.4%
Black CLF	287,641		2,694		2,095	
Employed	248,373	86.3%	2,374	88.1%	1,775	84.7%
Unemployed	39,268	13.7%	320	11.9%	320	15.3%
Asian CLF	66,993		3,759		3,189	
Employed	63,879	95.4%	3,444	91.6%	2,917	91.5%
Unemployed	3,114	4.6%	315	8.4%	272	8.5%
Hispanic CLF*	199,297		2,257		1,625	
Employed	185,879	93.3%	2,154	95.4%	1,538	94.6%
Unemployed	13,418	6.7%	103	4.6%	87	5.4%

*Hispanic ethnicity is counted independently of race

Source: U.S. Census Bureau, 2013 - 2017 American Community Survey (B23001, C23002A, C23002B, C23002D, C23002I)

Blacks are more likely than other groups to be unemployed in Bloomington with an unemployment rate of 15.3% compared to 7.4% for Whites.

Additionally, female workers are more likely to be unemployed than males, facing an unemployment rate of 8.4% compared to males at 7.1%.

B. Housing Market

i. Housing Inventory

According to the American Community Survey, there were 33,766 housing units in Bloomington in 2017. The City has a vacancy rate of 9.5%, 59.0% of which is its rental stock -- likely the result of a large, seasonal student population. This represented a 1.6% increase from 2010, but less than the 2.7% expansion rate of Monroe County. Bloomington represents 56% of the county's total housing inventory.

The change in housing units from 2010 to 2017 is depicted in Map 4 on the following page. Figure A-3 in the Appendix provides the change in housing units by census tract. Two of the five impacted areas experienced a loss of housing units of 5% or more, and only one had significant growth of 15% or more in that period. The remaining two impacted areas experienced housing expansions of between 1% and 5%.

The majority of Bloomington's housing stock is renter-occupied, multi-family units. These types of units can provide a more affordable option for residents, particularly in impacted areas. Multi-family units comprise over three-quarters of the rental market. Over three-quarters of renters in Bloomington live in multi-family housing compared to 68.6% of the County's rental population. Despite Bloomington containing 57.9% of the County's population, it contains 86.6% of the County's rental stock.

Map 5 illustrates the percent of multi-family housing that makes up each census tracts' housing inventory. This data is included in Figure A-4 in the Appendix. The majority of Bloomington's multifamily housing is located in two census tracts in the center of the city, with eight census tracts comprised of more than 50% multifamily housing units. Only two of those tracts are in impacted areas (census tracts 2.01 and 9.01) and one is adjacent to Indiana University (census tract 2.01) in the northeastern part of the City indicating it is most likely housing occupied primarily by students.

Figure 2-13
Housing Units by Type and Tenure, 2017

	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-Family Units ³
	Total	Single-Family ¹	Multi-Family ²	% Multi-Family	Total	Single-Family ¹	Multi-Family ²	% Multi-Family	
Monroe County	29,793	29,080	713	2.4%	25,221	7,910	17,311	68.6%	31.5%
Bloomington	10,537	10,140	397	3.8%	20,032	4,814	15,218	76.0%	49.8%

1. Includes detached and attached units, and mobile homes, boats, RVs, etc.

2. Includes structures with 2 or more units.

3. As a percent of all occupied units.

Source: 2013 - 2017 American Community Survey (B25032)

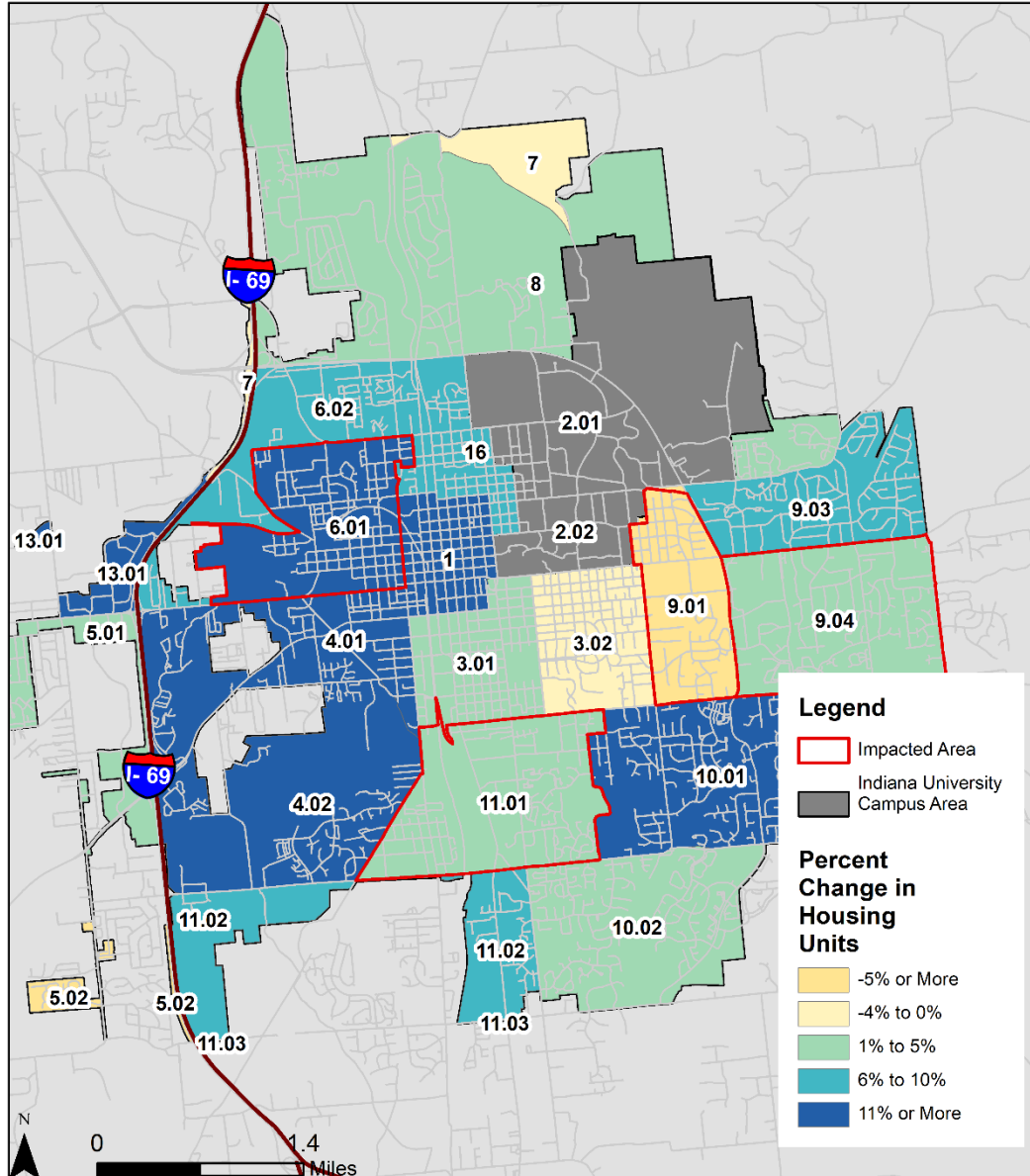
The City has a vacancy rate of 9.5%, 59.0% of which is its rental stock, which is likely the result of a large, seasonal student population.

The majority of Bloomington's housing stock is renter-occupied, multi-family units. These types of units can provide a more affordable option for residents, particularly in impacted areas. Multi-family units comprise over three-quarters of the rental market.

Map 4
Change in Housing Units, 2010 – 2017



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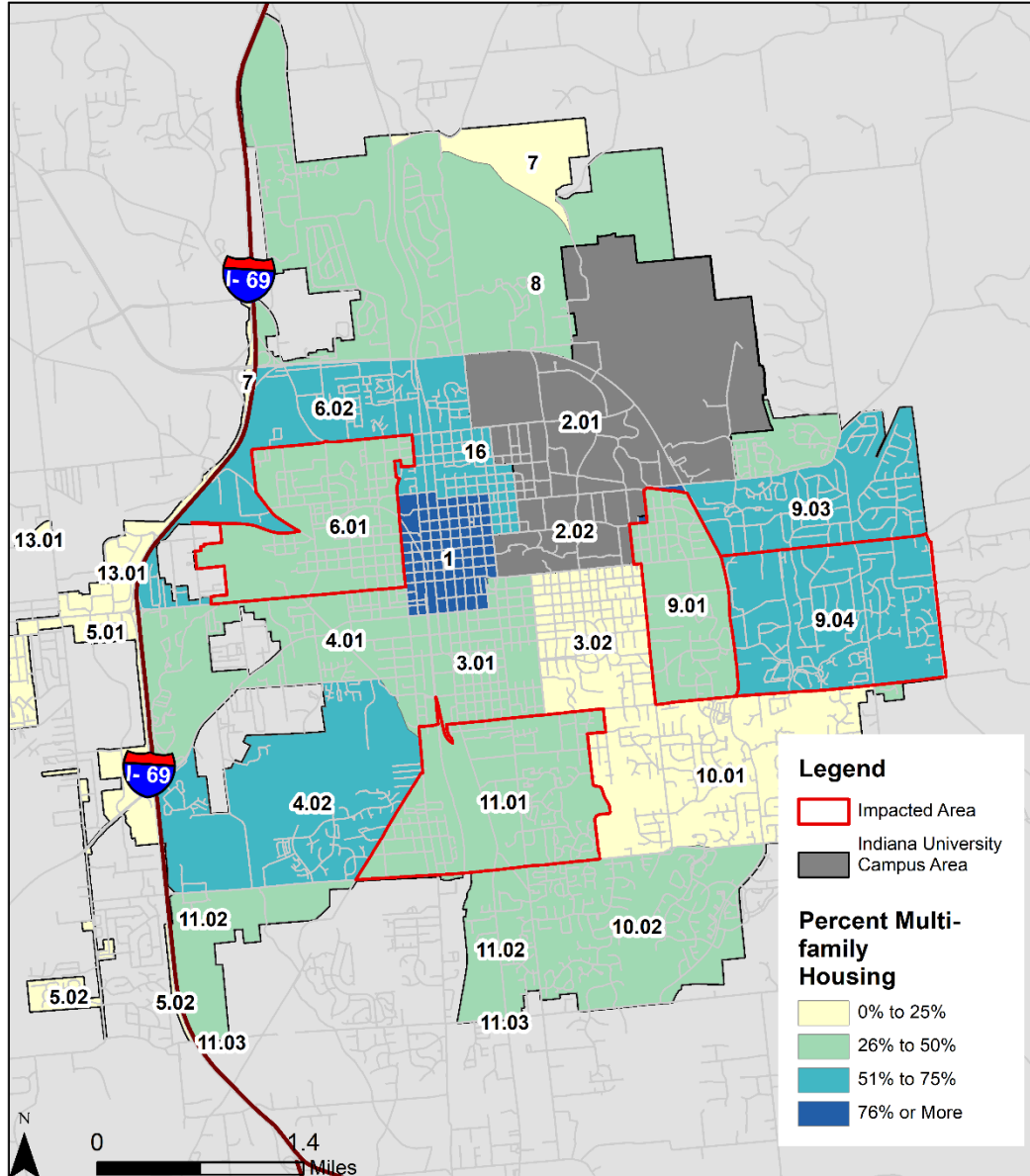


Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

Map 5 Percent Multi-Family Housing Units, 2017



City of Bloomington, Indiana
2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

ii. Protected Class Status and Homeownership

The value in homeownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."⁷

The proportion of Black, Asian, and Hispanic homeowners increased from 2000 to 2010. This is contrasted with a decrease in White homeownership, which contributed to an overall drop in the proportion of homeowners falling from 35.5% to 33.0%.

In 2017, the proportion of Blacks, Asians, and Hispanics homeowners fell slightly from their high-water marks in 2010. Black homeownership declined from 15.7% to 15.4% while Asian homeownership dropped from 15.7% to 14.8%, and Hispanic homeownership dropped from 21.3% to 20.6%.

Maps 6-8 on the following pages illustrate where Black, Asian, and Hispanic homeownership rates by census tract.

Figure 2-14
Change in Tenure by Race

	2000			2010			2017		
	Total	Own	Rent	Total	Own	Rent	Total	Own	Rent
Monroe County	46,898	53.9%	46.1%	54,864	52.6%	47.4%	55,014	54.2%	45.8%
White	42,960	56.9%	43.1%	49,133	55.9%	44.1%	49,035	57.8%	42.2%
Black	1,289	20.5%	79.5%	1,713	23.2%	76.8%	1,622	19.1%	80.9%
Asian	1,620	19.8%	80.2%	2,541	20.8%	79.2%	2,773	18.4%	81.6%
Hispanic*	664	24.8%	75.2%	1,237	31.7%	68.3%	1,370	34.6%	65.4%
Bloomington	26,417	35.5%	64.5%	31,425	33.0%	67.0%	30,569	34.5%	65.5%
White	23,219	38.4%	61.6%	26,681	35.9%	64.1%	25,643	37.8%	62.2%
Black	967	11.8%	88.2%	1,379	15.7%	84.3%	1,325	15.4%	84.6%
Asian	1,464	13.1%	86.9%	2,268	15.7%	84.3%	2,462	14.8%	85.2%
Hispanic*	531	18.6%	81.4%	921	21.3%	78.7%	1,016	20.6%	79.4%

*Hispanic ethnicity is counted independently from race

U.S. Census Bureau, 2000 & 2010 Decennial Census (SF1 & SF3), 2013 – 2017 American Community Survey (B25003, B25003A, B25003B, B25003D, B25003I)

The proportion of Blacks, Asians, and Hispanics who are homeowners increased from 2000 to 2010.

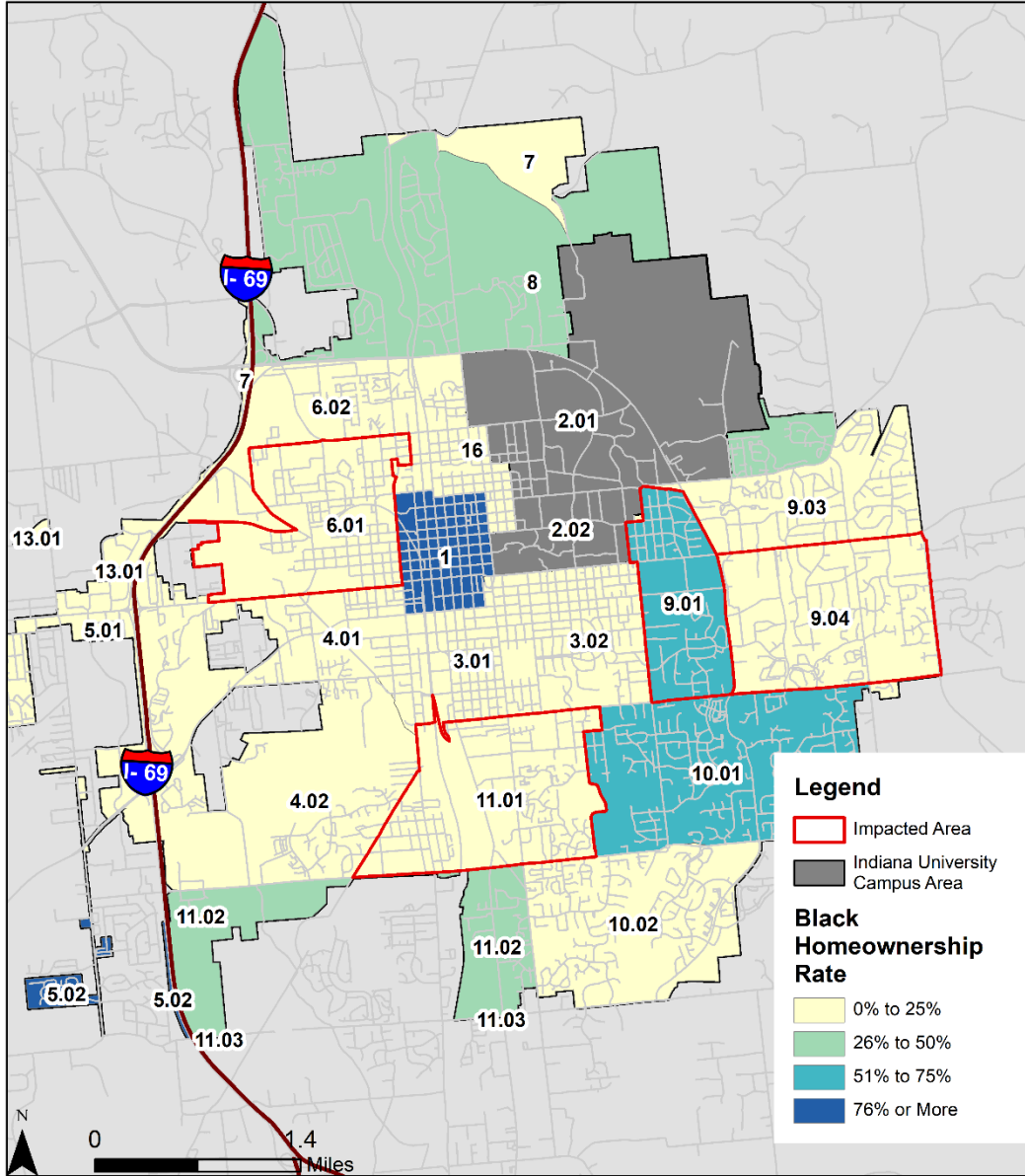
In 2017, the proportion of Blacks, Asians, and Hispanics homeowners fell slightly from their high-water marks in 2010. Black homeownership declined from 15.7% to 15.4% while Asian homeownership dropped from 15.7% to 14.8%, and Hispanic homeownership dropped from 21.3% to 20.6%.

⁷ Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Map 6 Black Homeownership Rates, 2017



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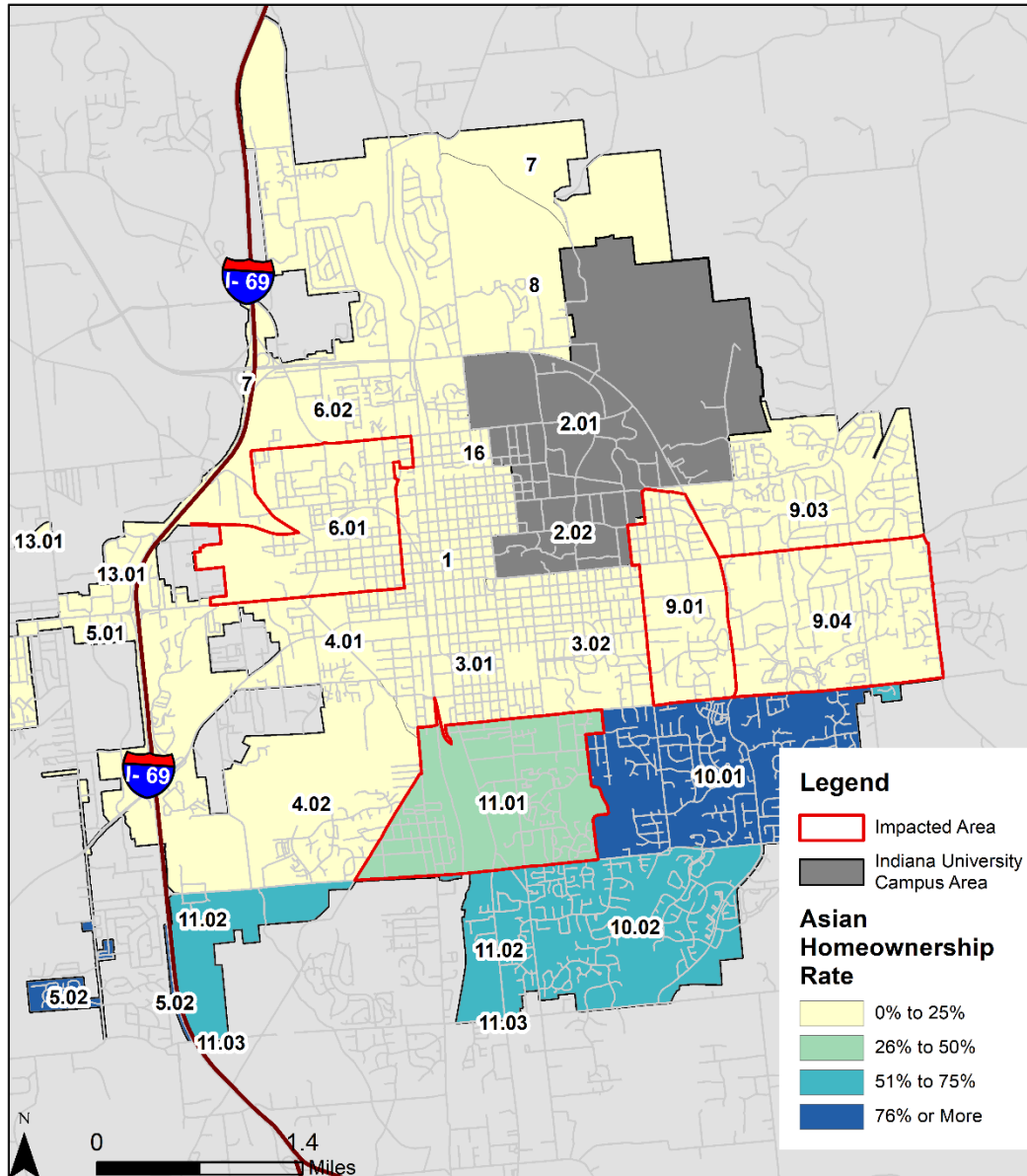


Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

Map 7
Asian Homeownership Rates, 2017



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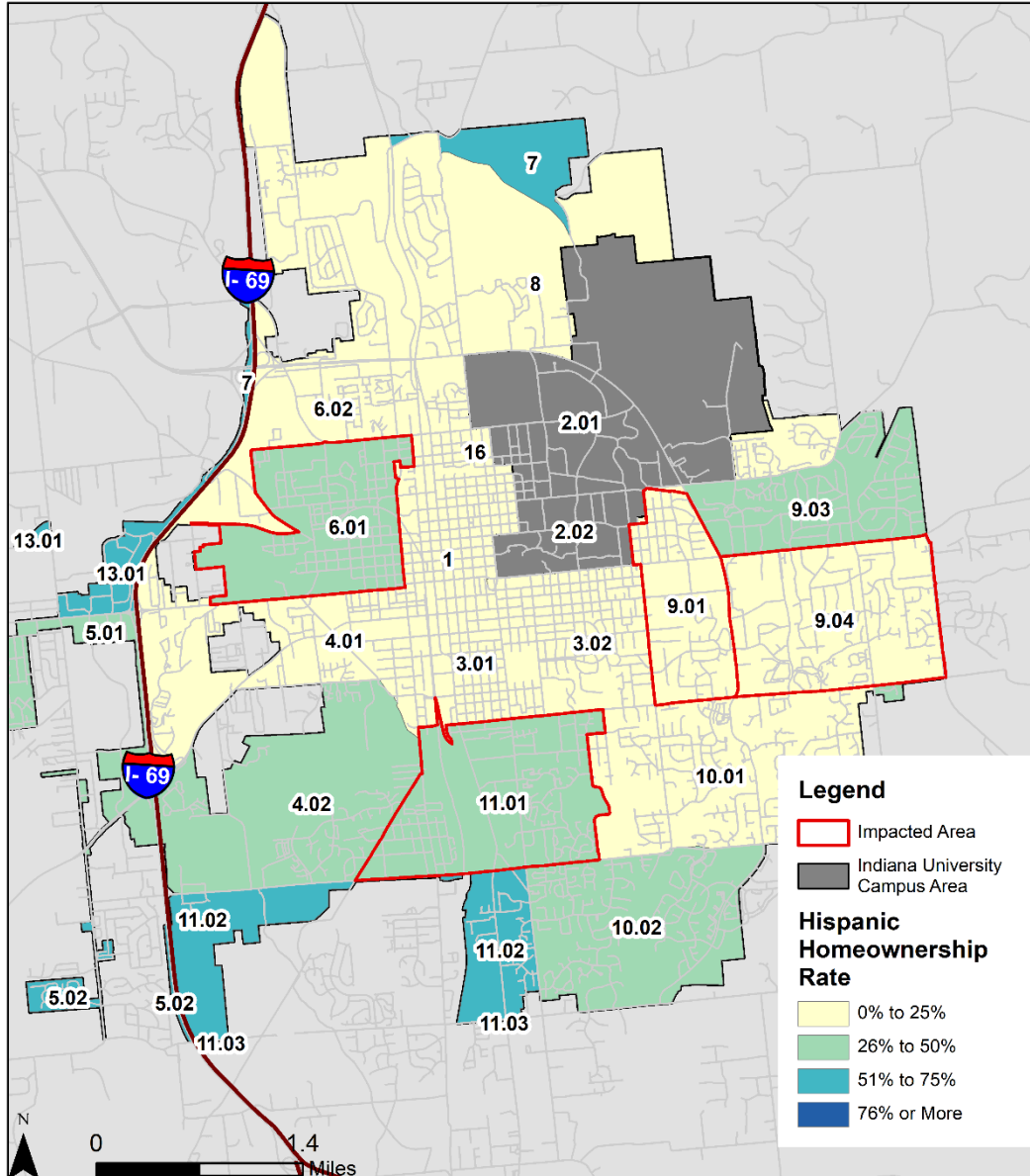


Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

Map 8 Hispanic Homeownership Rates



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Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

iii. Foreclosure Trends

The rate of foreclosure in Bloomington was 0.01% in 2018 or 1 in every 1,919 homes according to RealtyTrac, an aggregator of nationwide residential foreclosure, loan and property sales data. This rate is lower than the Indiana statewide rate of 0.03%. With fewer foreclosures than what is occurring across much of the rest of Indiana, Bloomington has a market that appears to have recovered from the foreclosure crisis that affected much of the country after the 2008 housing crisis.

The rate of foreclosure in Bloomington was 0.01% in 2018 or 1 in every 1,919 homes which is lower than the Indiana statewide rate of 0.03%.

With fewer foreclosures than what is occurring across much of the rest of Indiana, Bloomington has a market that appears to have recovered from the foreclosure crisis that affected much of the country after the 2008 housing crisis.

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

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

In 2010, the most current year available, over 60.0% of Black households and Hispanic households, and over 50.0% of Asian households were families with three or more persons compared to 46.5% of White households. Compared to the County, family households in Bloomington are slightly less likely to be larger families with the exception of Black family households where 62.7% of the City's family households have at least three persons compared to the County at 62.3%

Figure 2-15
Families with Three or More Persons, 2010

Race/Ethnicity	Families with Three or More Persons			
	Monroe County		Bloomington	
	#	%	#	%
All Family Households	13,805	50.5%	5,442	48.3%
White	12,447	49.7%	4,483	46.5%
Black	461	62.3%	333	62.7%
Asian	503	56.7%	393	55.4%
Some Other Race*	184	69.2%	106	64.6%
Two or More Races	215	58.4%	127	56.4%
Hispanic**	365	65.1%	216	62.4%

*Some Other Race includes Native Americans, Native Hawaiians, and individuals identifying as "some other race."

**Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, 2010 Decennial Census (P28).

In order to house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. Since minority households are more likely to have larger families and be renters, there needs to be a sufficient supply of larger rental units to meet their needs. In Bloomington, only 25.6% of rental units had three or more bedrooms in 2017, down slightly from 26.4% in 2010. By contrast, two-bedroom units increased slightly from 2010 to 2017. Due to the City's large student population, there is the risk that larger units become occupied by students for economic reasons rather than larger families in need of more space to avoid overcrowding. The City's focus and the focus of this AI is on creating housing options for low-income families.

Figure 2-16
Number of Bedrooms by Tenure

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock		Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	# of Units	% of Total Units	# of Units	% of Total Units	# of Units	% of Total Units	# of Units	% of Total Units
Monroe County	2010				2017			
0-1 Bedrooms	7,178	31.2%	658	2.3%	7,992	31.7%	389	1.3%
2 Bedrooms	9,428	40.9%	5,122	18.1%	10,001	39.7%	5,187	17.4%
3 or More Bedrooms	6,422	27.9%	22,580	79.6%	7,228	28.7%	24,217	81.3%
Total	23,028	100.0%	28,360	100.0%	25,221	100.0%	29,793	100.0%
Bloomington								
0-1 Bedrooms	6,282	33.6%	233	2.2%	6,713	33.5%	101	1.0%
2 Bedrooms	7,467	40.0%	2,243	21.6%	8,183	40.8%	2,259	21.4%
3 or More Bedrooms	4,937	26.4%	7,898	76.1%	5,136	25.6%	8,177	77.6%
Total	18,686	100.0%	10,374	100.0%	20,032	100.0%	10,537	100.0%

Source: U.S. Census Bureau, 2006 – 2010 & 2013 – 2017 American Community Survey (B25042)

In 2010, the most current year available, over 60.0% of Black households and Hispanic households, and over 50.0% of Asian households were families with three or more persons compared to 46.5% of White households.

In Bloomington, only 25.6% of rental units had three or more bedrooms in 2017, down slightly from 26.4% in 2010. By contrast, two-bedroom units increased slightly from 2010 to 2017.

v. Cost of Housing

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

Real median housing value fell 2.7% from 2000 to 2017 in Bloomington, while median gross rent rose 7.7% as a result of increasing demand for student rental housing. After adjusting for inflation, the median value of a home, as reported in the Census, peaked in 2012 at \$185,324. This is 4.9% decrease. The census tract with the median percent change in housing value from 2010 to 2017 experienced a decrease of 2.6%, while the census tract with the largest decrease witnessed values falling 26.6%. With housing values increasing in about half of the City's census tracts – median housing value increased by 22.3% in the tract with the largest increase – there are diverging markets in the City. This conclusion is supported by information provided by stakeholders.

Stakeholders in the City reported that the demand for homes in the sales market is so high that it is a common occurrence for a to sell less than a week after appearing on the market. Due to fast turnover and high demand it is believed that home values in certain neighborhoods are well beyond the median and out of reach for most households. This has created two markets in the City: an expensive, high-quality market and an affordable but low-quality market leaving few options available for the typical household.

The cost of rental housing rose slightly more in Monroe County. With nearly 80.0% of the County's total supply of renter occupied units located in Bloomington, a strong demand for student housing in close proximity to the University and elsewhere in the City appears to be driving up rents out in the County.⁸ In other words, the remaining rental stock in the County is commanding higher rents as residents seeking non-student rental housing are finding it available outside of Bloomington.

Median household income in Bloomington decreased 9.1% compared to a 4.7% decrease in the County, most likely driven by the student population with lower incomes. However, homeownership remains out of reach for many non-student households with increasing rents, declining incomes, and a high degree of competition for rental housing in Bloomington's market—all of which makes it more difficult and less affordable for non-student households who may be contemplating homeownership.

Due to incomes falling faster than the cost of housing, lower income residents in Bloomington have severely limited housing choice. Furthermore, with decreasing housing values lower income

⁸ U.S. Census Bureau, American Community Survey 2013-2017 5-Year Estimates (B25003)

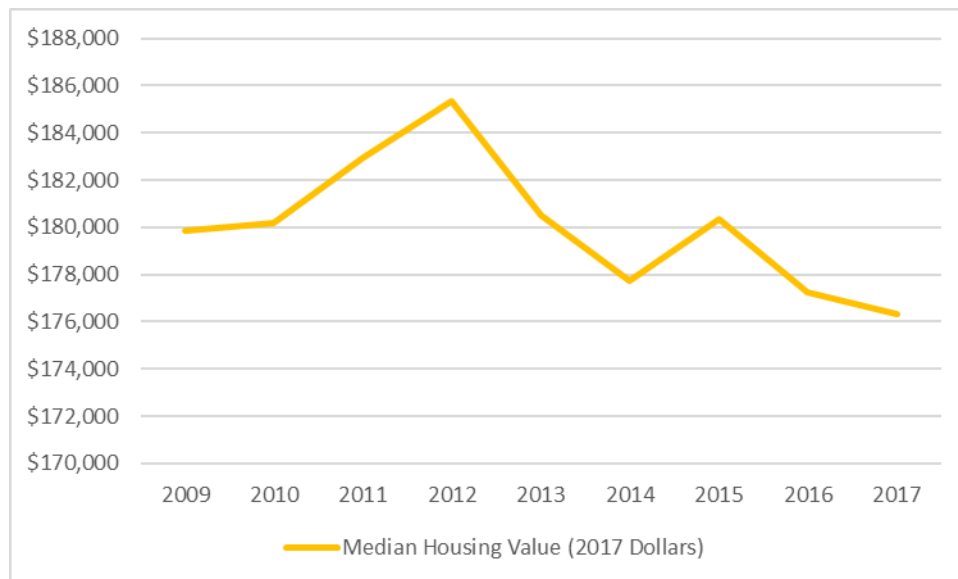
households depending on the value of their house as an appreciating asset are witnessing their investment depreciate which further exacerbates inequality among households.

Figure 2-17
Median Housing Value, Gross Rent, and Household Income

	Median Housing Value (Adjusted to 2017 Dollars)	Median Gross Rent (Adjusted to 2017 Dollars)	Median Household Income (Adjusted to 2017 Dollars)
2000			
Monroe County	\$162,708	\$806	\$47,922
Bloomington	\$181,266	\$801	\$36,508
2010			
Monroe County	\$164,405	\$815	\$42,740
Bloomington	\$180,319	\$804	\$30,718
2017			
Monroe County	\$163,900	\$869	\$45,689
Bloomington	\$176,300	\$863	\$33,172
% Change from 2000 - 2017			
Monroe County	0.7%	7.8%	-4.7%
Bloomington	-2.7%	7.7%	-9.1%

U.S. Census Bureau, 2000 Decennial Census (H076, H063, P053); 2006 – 2010 & 2013 – 2017 American Community Survey (B25077, B25064, B19013)

Figure 2-18
Median Housing Value in 2017 Dollars, 2009 - 2017



Real median housing value fell 2.7% from 2000 to 2017 in Bloomington, while median gross rent rose 7.7% as a result of increasing demand for student rental housing.

Median household income in Bloomington decreased 9.1%.

vi. Rental Housing

Bloomington's inventory of units renting for less than \$700 a month declined by 3,315 units between 2010 and 2017. This loss of the more affordable rental stock represented 87% of all lower cost rental units in Monroe County. In contrast, the higher end of the rental market expanded by 4,366 units renting for more than \$700 a month. Coupled with a declining median household income, the rental housing market is becoming more out of reach for lower income households. While the loss of some rental units may have been lost through demolition, it's more likely that rental rates increased over the eight-year period. Similarly, while many of the higher cost units were constructed during that period and expanding that end of the market, a sizable segment of the lower cost units most likely experienced rent increases and crossed over into the higher cost brackets.

Figure 2-19
Change in Affordable Rental Units, 2000 - 2017

Units Renting For:	2010	2017	Change 2000-2017	
			#	%
Monroe County				
Less Than \$500	3,629	2,325	-1,304	-35.9%
\$500 - \$699	6,922	4,413	-2,509	-36.2%
\$700 to \$999	6,771	8,813	2,042	30.2%
\$1,000 or more	5,125	8,735	3,610	70.4%
Bloomington				
Less Than \$500	2,952	1,716	-1,236	-41.9%
\$500 - \$699	5,868	3,789	-2,079	-35.4%
\$700 to \$999	5,223	7,025	1,802	34.5%
\$1,000 or more	4,327	6,891	2,564	59.3%

Sources: 2006 - 2010 & 2013 - 2017 American Community Survey (B25063)

Bloomington's inventory of units renting for less than \$700 a month declined by 3,315 units between 2010 and 2017.

In contrast, the higher end of the rental market expanded by 4,366 units renting for more than \$700 a month. Coupled with a declining median household income, the rental housing market is becoming more out of reach for lower income households.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each county in the U.S. In Bloomington, the FMR for a two-bedroom apartment in 2018 was \$920. The annual income required to make this rent affordable (no more than 30% of monthly income) is \$36,800. This required an annual income of 111.0% of the City median household income. The Indiana minimum wage was \$7.25 per hour or \$290 per week if working a 40-hour work week in 2018. In order to keep a two-bedroom apartment at the FMR affordable, a household would have to earn at least \$3,066 per month. At the minimum wage working 40 hours a week this would require 2.45 workers. The number of work hours required for a minimum wage earner to afford a two-bedroom apartment at the FMR is 98 hours. A zero-bedroom apartment requires 72 work hours.

A Supplemental Security Income (SSI) recipient in Monroe County receives \$750 per month. The rent affordable to a household relying solely on SSI income is only \$225 per month. There are only 382 units in Bloomington that rent for less than \$250 per month.⁹ Between 2010 and 2017, the number of apartments renting for this amount decreased by 142 units.

In Bloomington, the FMR for a two-bedroom apartment in 2018 was \$920. The annual income required to make this rent affordable (no more than 30% of monthly income) is \$36,800.

This required an annual income of 111.0% of the City median household income.

vii. Housing Sales

The median housing value of a home in 2017 in Bloomington was \$176,300, up 2.4% from 2016. One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level.¹⁰ This can be approximated by calculating the maximum affordable purchase price a household earning the median income could afford.

The calculations are based on a 30-year mortgage with the average interest rate for 2017, which was 3.9% as provided by Freddie Mac. The average annual homeowner's insurance in Bloomington was \$853 according to V-Home Insurance, an internet-based home insurance comparison tool. The real estate millage of 2.24 resulted in a monthly tax of \$396.12 for a median-priced home in the city. Calculations assume a 10% down payment and that the buyer had no other debt. A house is considered affordable if its monthly housing cost does not exceed 30% of gross income. These calculations are shown below in Figure 2-19.

Households in Bloomington earning the median household income and below are unable to purchase a home at the median housing value. When broken down by race, the housing market is least affordable for Asian households, where the median-earning household can only afford 14.2% of the median valued house in the City. Whites can afford 66.1% of the median valued house, while Hispanic households can afford 56.5%, and Black households 49.1%.

A household earning the median income in Bloomington can only afford to purchase a house that is 61.1% of the median valued home in Bloomington. This figure is slightly higher for the median

⁹ U.S. Census Bureau, American Community Survey 2006 – 2010 & 2013-2017 5-Year Estimates (B25063)

¹⁰ Joe Light, "Last of the Red-Hot Markets," Money Magazine December 2007: 53-56.

earning White household (66.1%), but decreases significantly for Black (49.1%), Asian (14.2%), and Hispanic (56.5%) households. The income needed for the median valued home in Bloomington to be considered affordable a household needs an income of at least \$52,080. The City median household income of \$33,172 is 63.7% of the minimum income needed to purchase a median valued home. Black household income is 52.3% of this amount and Hispanic household income is 59.3%.

Figure 2-20
Maximum Affordable Home Purchase Price by Race and Ethnicity, 2017

	Median Household Income 2017	Monthly Mortgage Payment				Total Allowable PITI Payment (30% gross income)	Total allowable debt service (43% gross income)	Maximum Affordable Purchase Price	Median Home Value, 2017
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance	PMI				
Bloomington	\$33,172	\$462	\$242	\$71	\$54	\$829	\$1,189	\$107,726	\$176,300
White	\$35,643	\$500	\$262	\$71	\$58	\$891	\$1,277	\$116,503	
Black	\$27,232	\$372	\$195	\$71	\$43	\$681	\$976	\$86,627	
Asian	\$9,909	\$108	\$56	\$71	\$13	\$248	\$355	\$25,097	
Hispanic*	\$30,865	\$427	\$224	\$71	\$50	\$772	\$1,106	\$99,532	

*Hispanic ethnicity is counted independent of race

Calculations by Mullin & Longergan

A household earning the median income in Bloomington can only afford to purchase a house that is 61.1% of the median valued home in Bloomington. This figure is slightly higher for the median earning White household (66.1%), but decreases significantly for Black (49.1%), Asian (14.2%), and Hispanic (56.5%) households.

The income needed for the median valued home in Bloomington to be considered affordable is at least \$52,080. The City's median income is 63.7% of this amount. Black household income is 52.3% of this amount and Hispanic household income is 59.3%.

viii. Protected Class Status and Housing Problems

Lower income minority households tend to experience housing problems at higher rates than lower income White households.¹¹ In 2015, the year with the most recent data, renters in Bloomington faced housing problems at greater rates than homeowners – 83.4% compared to 52.0%. Among renters, Black households (91.3%) were more likely to experience one of the four housing problems than White households (82.3%) and Hispanic households (88.5%). However, due to the City being comprised largely of White households, the number of minority households experiencing housing problems is small in comparison to the number of White households. There were 840 Black and 460 Hispanic households compared to 9,090 White households experiencing housing problems.

In the case of homeowners, the experiences were widely varied. In Black households, housing problems were experienced at drastically lower rates with 21.1% experiencing at least one type of housing problem compared to 52.0% of all Bloomington households. However, among

¹¹ HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) cost burden of 50% or more (also called severe cost burden) (3) lacking complete kitchen or plumbing facilities, and/or (4) overcrowding of more than 1.01 persons per room.

Hispanic homeowners, 75.0% experienced at least one type of housing problem. Similarly, due to the large proportion of White households, the majority of housing problems were experienced by a much higher number of White households. There were 2,315 White owner-occupied households with a housing problem compared to 19 Black Households and 40 Hispanic households.

Figure 2-21
Housing Problems by Race

	All Households 0-80% of MFI	
	Total	% With Housing Problem
Renters		
White Non-Hispanic	11,045	82.3%
Black Non-Hispanic	920	91.3%
Asian Non-Hispanic	1,144	85.2%
Hispanic	520	88.5%
Total	13,629	83.4%
Owners		
White Non-Hispanic	2,315	52.9%
Black Non-Hispanic	19	21.1%
Asian Non-Hispanic	170	38.2%
Hispanic	40	75.0%
Total	2,544	52.0%

Source: 2015 HUD Comprehensive Housing Affordability Strategy Data

Generally, the most common of the four housing problems is cost burden – spending more than 30% of household income on housing. The data provided by HUD is not broken down by income for this category but, considering the trajectory of the housing market in Bloomington, cost burden is more likely to affect low-income households getting squeezed by rising rental costs and falling wages.

More than half of renters were cost burdened with 61.1% of households spending more than 30% of their income on rent. Black households are disproportionately more likely to be cost burdened at 72.4% of renters, however, 63.3% of White renters and 56.9% of Hispanic renters were also cost burdened. Among Asian renters 42.7% were cost burdened. Less than one in five homeowners were cost burdened in Bloomington. Black and Asian homeowners were the most likely to be cost burdened with 20.5% and 22.5% of homeowners cost burdened compared to 16.1% of White and 14.1% of Hispanic homeowners. The extreme difference in cost burden between renters and owners supports what stakeholders observed about the housing market. Homeownership is too expensive for most households leaving them to rent in a rental market that is becoming more expensive and increasingly driven by a rising supply of luxury units.

Figure 2-22 Cost Burdened Households by Race

	All Households	
	Total	% Cost Burdened
Renters		
White Non-Hispanic	15,120	63.3%
Black Non-Hispanic	1,545	72.4%
Asian Non-Hispanic	2260	42.7%
Hispanic	835	56.9%
Total	10,905	61.1%
Owners		
White Non-Hispanic	9,165	16.1%
Black Non-Hispanic	220	20.5%
Asian Non-Hispanic	355	22.5%
Hispanic	205	14.1%
Total	205	16.4%

Source: 2015 HUD Comprehensive Housing Affordability Strategy Data

Generally, the most common of the four housing problems is cost burden – spending more than 30% of household income on housing.

More than half of renters were cost burdened (61.1%). Black households are disproportionately more likely to be cost burdened at 72.4% of renters, however, 63.3% of White renters and 56.9% of Hispanic renters were also cost burdened.

3. Evaluation of Fair Housing Profile

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

A. Existence of Fair Housing Complaints

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

i. HUD's Office of Fair Housing and Equal Opportunity

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from persons regarding alleged violations of the Fair Housing Act. A written request was made to the FHEO for housing discrimination complaints filed by City residents; no response was received.

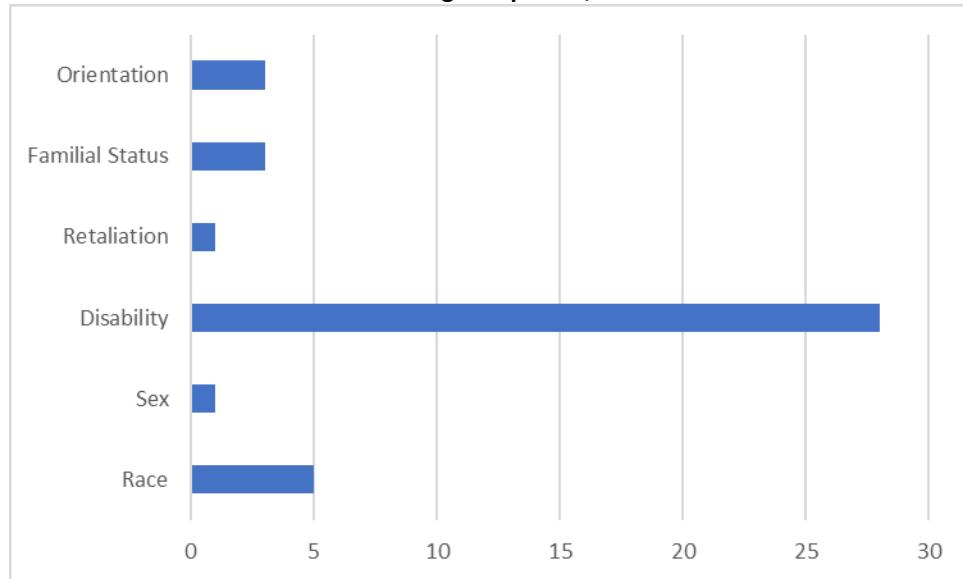
ii. Indiana Civil Rights Commission

Indiana Civil Rights Commission (ICRC) oversees the enforcement of state and federal fair housing laws throughout the state. It also investigates claims of discrimination in relation to housing. A written request was made to the ICRC for housing discrimination complaints filed by City residents; no response was received.

iii. Bloomington Human Rights Commission

The Bloomington Human Rights Commission (BHRC), while not a substantially equivalent human rights organization by HUD's standards, investigates and enforces cases of housing discrimination in Bloomington. From 2017 to 2019, there was a total of 35 complaints. Because a complaint can have more than one basis for discrimination, there was 41 bases for complaints. Disability was the largest source of discrimination complaints with 28 recorded instances. Race was the second most often source of complaint with only five instances. BHRC has acted as a source of information for those with discrimination complaints and often prevents escalation to legal proceedings by making sure all parties are informed of their rights and responsibilities. Out of the 35 complaints received, 12 were resolved without any further legal action. Only one complaint has escalated to legal actions (the results are still pending litigation).

Figure 3-1
BHRC Fair Housing Complaints, 2017 – 2019



iv. Existence of Fair Housing Legal Proceedings

There are no legal proceedings against the City of Bloomington.

v. Determination of Unlawful Segregation

The City of Bloomington is not under any segregation order.

4. Evaluation of Public and Private Sector Policies

A. Public Sector Policies

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

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

i. Public Housing

The Bloomington Housing Authority (BHA) manages the City's supply of public housing which currently houses 293 households. The majority of public housing residents are White (84.6%) and over half of all households are families with children (51.9%). Black and Hispanic residents both comprise 4.2% of the City's population but are overrepresented in public housing units where Blacks account for 16.4% and Hispanics 7.5% of households. The Map 9 portrays where public housing residents reside in Bloomington.

Figure 4-1
Characteristics of Public Housing Households

	Public Housing Residents	
	# of Households	%
Total Households	293	100.0%
Families with Children	152	51.9%
Elderly Households (1 or 2 Persons)	38	13.0%
Individuals/Families with Disabilities	114	38.9%
Black Households	48	16.4%
White Households	248	84.6%
Asian Households	4	1.4%
Hispanic Households	22	7.5%
Other Race Households	0	0.0%

Note: Percentage may not equal 100% due to rounding and overlap of family types.

Source: Bloomington Housing Authority

The public housing waitlist contains 76 households. Nearly three-quarters of waitlisted households are White followed by Black households which comprise 25.0% of the waitlist. Elderly households are only 7.9% of the waitlist, while families with children and households with at least one disabled person each comprise about one-fourth of the waitlist.

Figure 4-2
Characteristics of Public Housing Waitlist

	Public Housing Residents	
	# of Households	%
Total Households	76	100.0%
Families with Children	19	25.0%
Elderly Households (1 or 2 Persons)	6	7.9%
Individuals/Families with Disabilities	18	23.7%
Black Households	19	25.0%
White Households	56	73.7%
Asian Households	0	0.0%
Hispanic Households	2	2.6%
Other Race Households	2	2.6%

Note: Percentage may not equal 100% due to rounding and overlap of family types.

Source: Bloomington Housing Authority

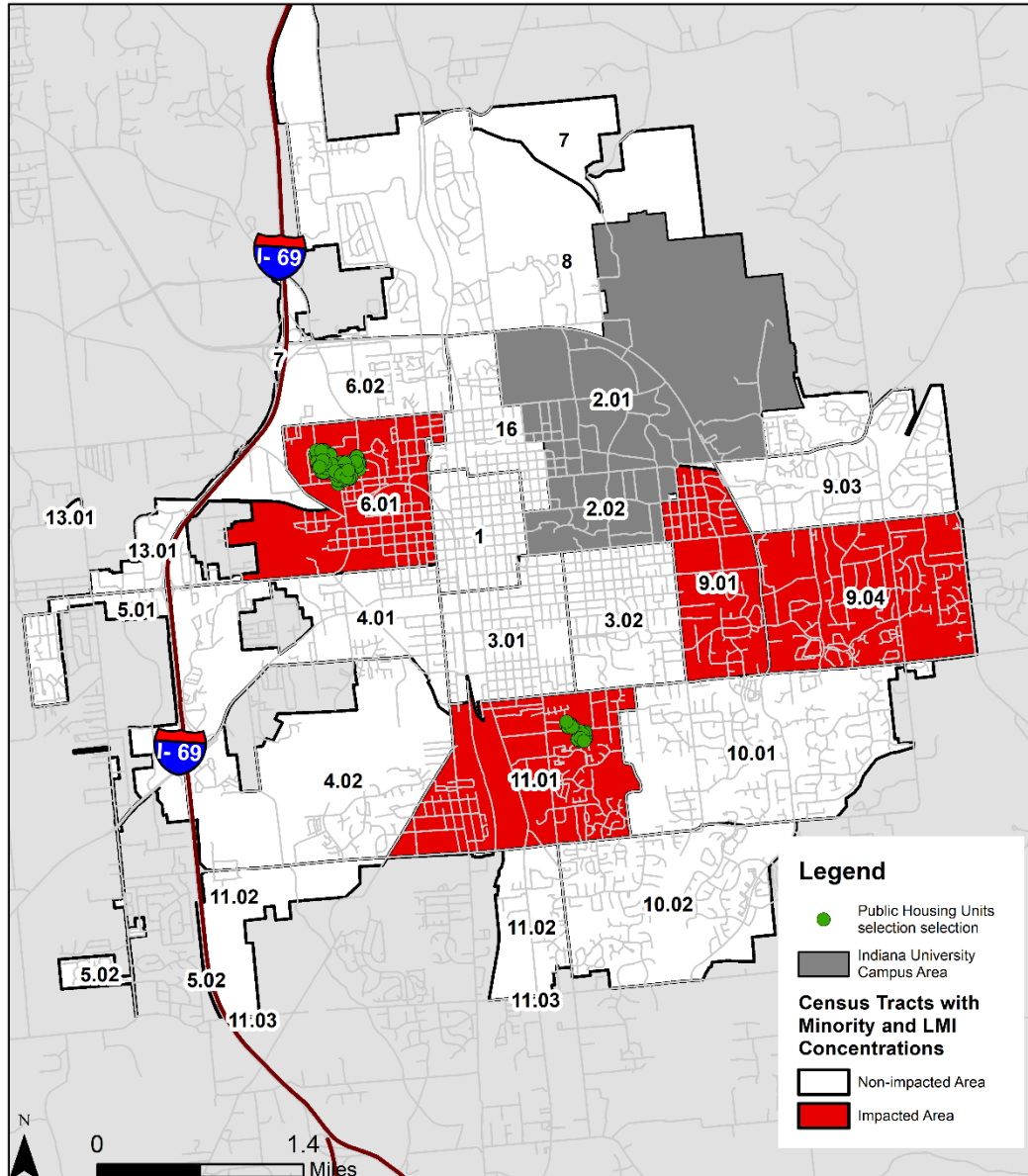
The BHA is currently implementing a Rental Assistance Demonstration (RAD) conversion with the goal of being completely converted before 2024. A RAD conversion allows BHA to transfer its inventory to a mission driven affiliate who will manage the properties. They will be kept affordable through project-based vouchers. The BHA sees itself as an affordable housing developer and plans to use the conversion as a mechanism to free up capital which will allow it to develop additional affordable housing in the future. The City already has a strong relationship with BHA, having committed funds in the past to housing rehabilitation of public housing units. The City will maintain this relationship and when appropriate commit CDBG or HOME funds towards BHA affordable housing development.

Map 9 Public Housing Units



City of Bloomington, Indiana

2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

As Illustrated on Map 9, nearly all public housing units are located in impacted areas. Because minorities are overrepresented among public housing residents, the placement of public housing units in impacted areas only serves to increase the concentration of low-income and minority residents in these neighborhoods. The locations of proposed affordable housing development by BHA will be considered by the City when deciding to commit funds, with the goal of encouraging new development outside of impacted areas.

The BHA is currently implementing a RAD conversion which will allow it to free up capital for developing new affordable housing.

The City already has a strong relationship with BHA, having committed funds in the past to housing rehabilitation of public housing units. The City will maintain this relationship and when appropriate commit CDBG or HOME funds towards BHA affordable housing development. The City will also consider the location of proposed affordable housing development by BHA when deciding to commit funds, with the goal of encouraging new development outside of impacted areas.

ii. Housing Choice Voucher Program

BHA also manages the City's Housing Choice Voucher Program (HCV). There are currently 1,295 households using an HCV to pay for housing. The majority are extremely low income (81.2%), earning 30% median family income (MFI) or less. Families with children comprise 38.9% of HCV households and slightly over one-fifth are elderly households. Nearly half of households (46.6%) have at least one person with a disability. Black households comprise 19.8% of HCV households despite only comprising 4.2% of the City's population.

**Figure 4-3
Characteristics of HCV Holders**

	Public Housing Residents	
	# of Households	%
Total Households	1,295	100.0%
Extremely Low Income (<30% MFI)	1,051	81.2%
Very Low Income (>30% but <50% MFI)	206	15.9%
Low Income >50% but < 80% MFI	80	6.2%
Families with Children	504	38.9%
Elderly Households (1 or 2 Persons)	264	20.4%
Individuals/Families with Disabilities	604	46.6%
Black Households	256	19.8%
White Households	1,058	81.7%
Asian Households	4	0.3%
Other Race Households	16	1.2%

Note: Percentage may not equal 100% due to rounding and overlap of family types.

Source: Bloomington Housing Authority

Map 10 portrays the race and ethnicity of housing choice vouchers by zip code. It is a density dot plot where the number of HCV users are placed randomly in the zip code where they are located to illustrate the number of HCV holders in a particular area without violating the households' privacy. HCVs do not need to be used in the city where they were issued, so it is likely that many now reside outside Bloomington. Stakeholders said that the HCV payment standard cannot compare to market rate rent in Bloomington leading them to believe many HCV users must go outside the City in order to find housing. This restricts the housing choice of those that would prefer to stay in Bloomington due to proximity to employment, schools, family, etc. It could also restrict them to impacted areas within the City.

Stakeholders also expressed the difficulty of getting some landlords to accept HCVs despite the guarantee of payment from these tenants. The City and BHA will partner in order to provide education for landlords and encourage them to accept HCV tenants. This could also be accomplished by adding "source of income" to the protected classes in order to prevent discrimination on this basis, however, Indiana state law has made it illegal for cities to make this a protected class.

There are 1,195 households on the HCV waitlist. With almost 80.0% of applicants earn 30% of Median Family Income (MFI) or below, there is a high level of demand among Bloomington's lowest income households. Only five households earn more than 50.0% MFI. Black households comprise 59.0% of the waitlist and White households are 41.0%. Over 50.0% of households are in need of housing with two or more bedrooms, which is due to the 59.0% of waitlisted households that are families with children. The next highest level of need is among households with a disabled member which comprises 24.0% of the waitlist. Only 0.4% of waitlisted households are elderly.

Figure 4-4
Characteristics of HCV Waitlist

	HCV Applicants	
	# of Households	%
Total Households	1,195	100%
Extremely Low Income (<30% MFI)	951	79.6%
Very Low Income (>30% but <50% MFI)	239	20.0%
Low Income >50% but < 80% MFI	5	0.4%
Families with Children	692	58.0%
Elderly Households (1 or 2 Persons)	43	0.4%
Individuals/Families with Disabilities	224	24.0%
Black Households	701	59.0%
White Households	489	41.0%
Asian Households	9	1.0%
Other Race Households	34	3.0%
Characteristics by Bedroom Size		
0 Bedroom	0	0.0%
1 Bedroom	564	36.0%
2 Bedroom	318	30.0%
3 Bedroom	223	24.0%
4+ Bedroom	90	8.0%

Note: Percentage may not equal 100% due to rounding and overlap of family types.

Source: Bloomington, Indiana Housing Authority

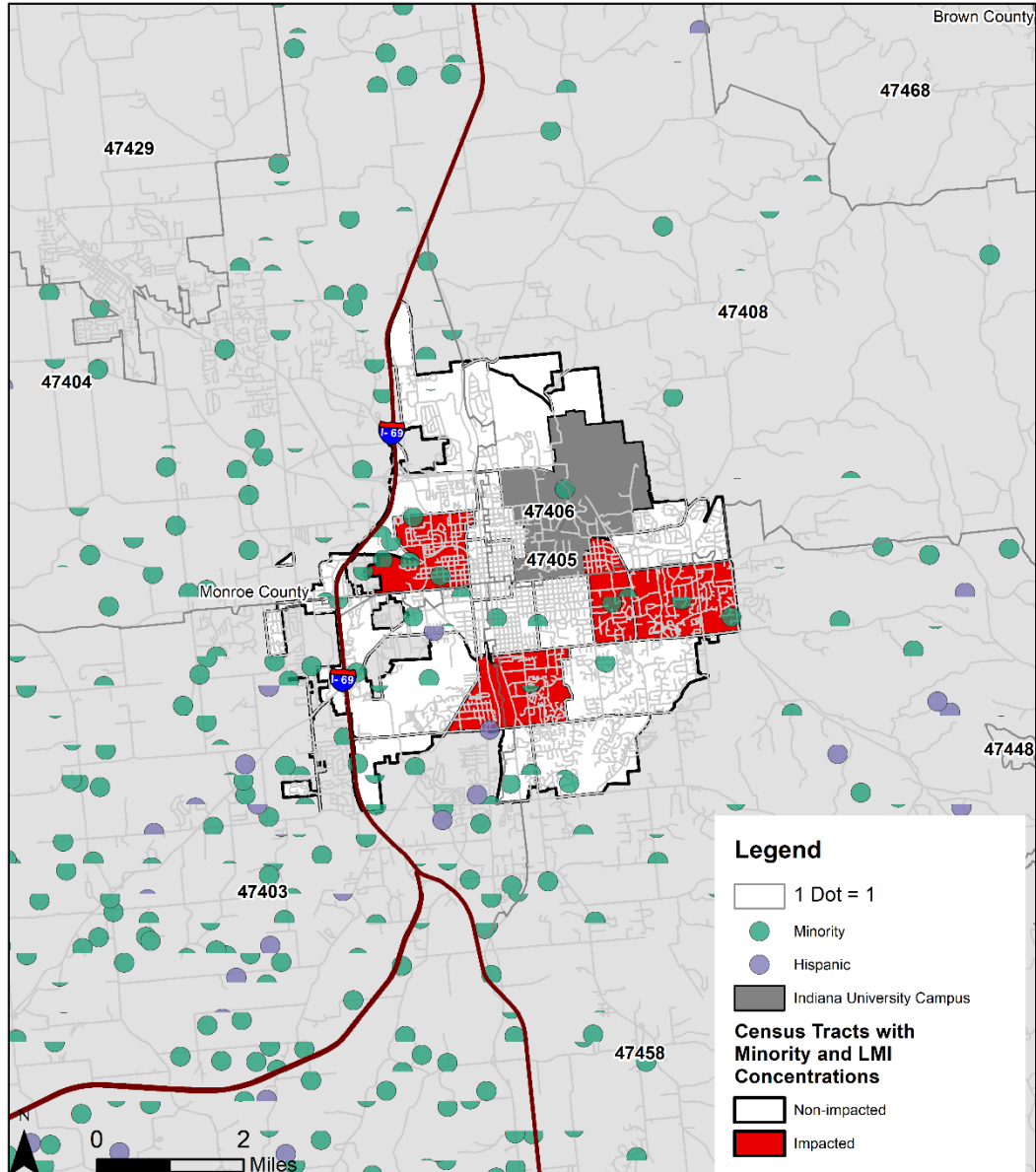
Precise locations of HCV households were not available due to privacy concerns; however, it appears that many HCV users seek housing outside of Bloomington.

Stakeholders stated that it is difficult for many HCV users to obtain housing in Bloomington due to high market rate rents and their lack of acceptance among landlords. The City will consider partnering with BHA in order to provide education for landlords and encourage them to accept HCV tenants. This could also be accomplished by adding “source of income” to the protected classes in order to prevent discrimination on this basis, however, Indiana state law has made it illegal for cities to make this a protected class.

Map 10 Housing Choice Vouchers by Zip Code



City of Bloomington, Indiana
2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity
Note: Dots are randomly placed by zip code and do not represent precise locations of Housing Choice Voucher holders

iii. Policies Governing Investment of Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers. Past fair housing settlements in the United States also reinforce the importance of expanding housing choice in non-impacted areas (i.e., areas outside of concentrations of minority and LMI persons).

As an entitlement community, Bloomington receives CDBG and HOME funds directly from HUD. The City's 2015 – 2019 Consolidated Plan identifies two strategies and four objectives related to housing. The City's strategy is to increase the number of affordable housing units and improve existing owner-occupied structures for LMI residents. As a part of the City's housing strategies are the following four objectives:

- Create opportunity for the development of affordable housing.
- Provide financial assistance for the development or modification of housing that is accessible.
- Create opportunity for the development of affordable senior housing.
- Work to develop creative ways to encourage workforce housing close to employment centers.

Bloomington received \$836,999 CDBG and \$584,637 HOME funds allocated by HUD in 2018 for investment in the community. The Department of Housing and Neighborhood Development (HAND) manages the City's HUD allocated funds.

a. Allocation of Funds

Bloomington's CDBG applications require applicants to describe how a project will meet national objectives. They must also describe how projects meet community needs and how they align with the community's long-term planning. Projects that receive funding are required to document income and racial information of assisted households. A review of the City's 2018 Consolidated Annual Performance and Evaluation Reports (CAPER) reveals that the housing related projects funded through the CDBG and HOME programs focus on owner- and renter-occupied housing development, housing rehab and modifications, and financial housing assistance.

While these projects have the potential to affirmatively further fair housing, there is no mechanism in the application process to encourage development of affordable housing outside of areas impacted by poverty and racial concentration. The City will include a map of impacted areas in its application and strongly encourage development of new housing to occur outside of these neighborhoods.

The projects Bloomington funds through CDBG and HOME allocations have the potential to affirmatively further fair housing, however, there is no mechanism in the application process to encourage development of new affordable housing outside of areas impacted by concentrations of minority and LMI residents.

The City will include a map of impacted areas in its application and strongly encourage development of new housing to occur outside of these neighborhoods.

b. Geographic Distribution of Activities

From the last three CAPERs, the City conducted 36 emergency home repairs, 23 home modifications, assisted 18 households with down payment assistance, and built 10 new affordable units. It also assisted BHA rehab multiple units over this time period. Most of these projects occurred in the two impacted areas that are not heavily populated with students, however, half of households assisted with down payments were purchasing housing outside of impacted areas.

Bloomington's down payment assistance, which is providing housing opportunities outside of impacted areas, should be continued, while the City seeks to invest in other projects outside of impacted areas, particularly those projects that are focused on homeownership and building new affordable housing. This can be done by scoring applications for CDBG and HOME funds that will go towards these projects and giving more weight to projects that will provide housing outside of impacted areas. The City will also continue to provide assistance in impacted areas, improving housing conditions and quality of life for residents in those neighborhoods.

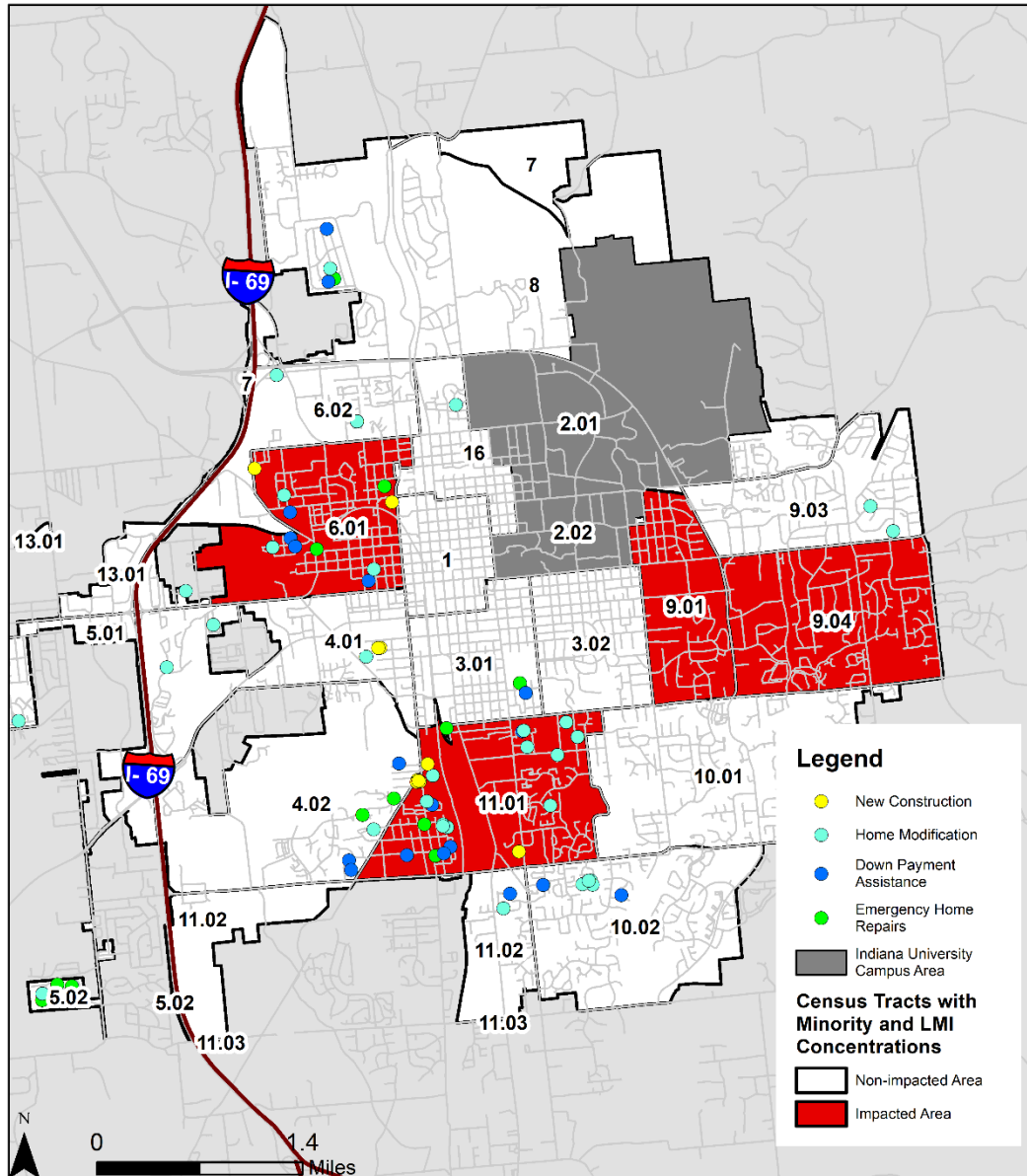
Most of the City's CDBG housing projects took place inside impacted areas with the exception of down payment assistance, where half of those assisted purchased homes outside impacted areas.

The City will seek to invest in projects outside of impacted areas particularly those projects that are focused on homeownership and building new housing, similar to its down payment assistance program. This can be done by scoring applications for CDBG and HOME funds that will go towards these projects and giving more weight projects that will provide housing outside of impacted areas. The City will also continue to provide assistance in impacted areas, improving housing conditions and quality of life for residents in those neighborhoods.

Map 11 Location of CDBG Investments



City of Bloomington, Indiana
2020 - 2024 Analysis of Impediments to Fair Housing Choice



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

c. Affirmative Marketing Policy

As a recipient of HOME funds, the City is required to adopt affirmative marketing procedures and requirements for all HOME-assisted housing with five or more units. Such a plan must include:

- Methods of informing the public, owners and potential tenants about fair housing laws and the City's policies,
- A description of what the owners and/or the City will do to affirmatively market housing assisted with HOME funds,
- A description of what the owners and/or the City will do to inform persons not likely to apply for housing without special outreach,
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Recipients of HOME funds are required to comply with the affirmative marketing requirements found at 24 CFR Part 108. Any CDBG- or HOME-assisted project consisting of five or more dwelling units is subject to these regulations. Affirmative marketing is a marketing strategy designed to attract renters and buyers who are least likely to apply for the assisted housing in order to make them aware of available affordable housing opportunities.

Many HUD entitlements require project applicants and owners to complete HUD Form 935.2 in which their proposed marketing initiatives can be described. However, simply requiring the completion of this standardized form does not fulfill all of the entitlement's affirmative marketing obligations. A written policy is needed in which the following issues can be addressed:

- A pre-occupancy conference with the project owner,
- The ways in which the affirmative marketing activities will be monitored for compliance,
- Actions to be taken for non-compliance,
- How compliance with the affirmative marketing plan will be determined,
- How complaints alleging violations of the federal regulations or affirmative marketing plan will be handled, and
- What sanctions, if any, will be enforced by the jurisdictions for non-compliance.

Bloomington last updated its affirmative marketing plan in 2015. The plan states that any developer or provider of a HOME funded housing project must:

- Make use of the Equal Housing Opportunity logotype or slogan in all HOME program related advertisements, notices, and communications.
- Clearly display a fair housing poster in a public place within your office.
- Identify the market population least likely to apply for housing and the marketing efforts that will be used to reach this segment of the housing market population.
- Notify HAND when vacant HOME units become available for purchase or rent for HAND to notify a listserv of interested community agencies that serve clientele who are likely to be income eligible for HOME units.

The affirmative marketing plan also requires developers/providers to solicit applications from persons otherwise unlikely to apply for housing without special outreach. Actions to be taken include:

- For each HOME project, housing developers/providers will identify the market population least likely to apply for housing and the marketing efforts that will be used to reach this segment of the housing market population outside of normal marketing practices.
- Housing developers/providers will provide notices of vacant units or units that will become vacant within 30 days to HAND.
- Notify HAND when vacant HOME units become available for purchase or rent for HAND to notify a listserv of interested community agencies that serve clientele who are likely to be income eligible for HOME units.

The City will take actions to monitor the affirmative marketing plan's effectiveness and will take corrective actions if needed. These actions include:

- There will be an annual assessment of the success of the plan with a summary outlined in the CAPER.
- The summary in the CAPER will examine the demographics of persons who applied and became tenants or owners of HOME funded units and how those demographics compare to the overall demographics of the housing market area. If it is determined that there is a lack of representation by a specific population the plan will be reviewed to determine if changes are necessary to improve the effectiveness of efforts.
- In accordance with the HOME agreement, a funded developer/provider is contractually obligated to follow and comply with the AMP and failure to comply will be considered an event of default. Thirty days will be given to correct any compliance issues found. The City of Bloomington will have the option to take corrective action if necessary. Corrective action may include, but not be limited to, immediate repayment of the grant or loan, or disqualification from future HOME funding.

These provisions comply with HUD requirements for affirmative marketing.

iv. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. The International Residential Code and International Building Code are the building standards governing Bloomington's building standards. These codes are ADA compliant. The City's zoning code also requires landlords to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford a tenant with a disability equal opportunity to use and enjoy a dwelling, which acts to provide fair housing opportunities to residents with a disability. The City is in compliance with fair housing laws with regards to residential accessibility.

v. Persons with Limited English Proficiency

HUD entitlement communities are required to provide LEP residents with access to services. Communities that have large enough LEP populations of the same language are required to create a Language Access Plan (LAP), which identifies the needs of the LEP population and addresses how the community will meet those needs. In 2007, the City conducted a four-factor analysis and found that the largest LEP population is persons who speak Spanish. It also found that the City had a significant Chinese speaking student population.

In response to this analysis, the City provided “I speak” cards that will allow staff to identify the language an LEP individual speaks if encountered. Bloomington has identified staff members who are fluent in Spanish that can provide translation services if needed, while vital documents were determined and translated into Spanish. Sheets of common terms translated into Spanish are also provided to staff. Bloomington also has translation services of Asian languages available through Indiana University that it will be used at the City’s expense. The City also contracted an interpretation service that is available by phone.

A review of the most recently available census data finds that the largest LEP population is now Chinese speaking persons. The City’s LAP provides sufficient language access resources for Spanish-speaking persons; however, the City must update it to include translation of vital documents into Chinese as well due to the growth of this population since its last four-factor analysis.

A review of the most recently available census data finds that the largest LEP population in the City is Chinese speaking.

The City’s LAP provides sufficient language access resources for Spanish-speaking persons; however, the City will conduct a new four factor analysis to identify additional resources that may be needed for its LEP Chinese-speaking population who may be eligible for programs and services. The City will then take steps to provide those resources.

vi. Comprehensive Planning

A community’s Comprehensive Plan is a statement of policies relative to future development and the preservation of existing assets. Bloomington’s most recent Comprehensive Plan was adopted in 2002. Its policies plan through 2040 but the City commits to periodic updates. The last update was drafted and confirmed by the City in 2018. The Plan establishes future land use objectives for the City through several future land use types. The Plan describes the types relevant to the AI as:

Mixed Urban Residential

Older neighborhoods that were developed using a traditional block and grid-like street pattern. Many of these are the most central neighborhoods of Bloomington. The district includes both single-family residences and larger 2-4 story apartment buildings. They are built at higher densities than the Neighborhood to 30 units per acre. The district is built out; the most appropriate development activity is the rehabilitation of older structures for residential uses. Historic designations are common in this district which constrains rehabilitation activities and

maintaining neighborhood character is emphasized. Multi-family developments are allowed but must maintain neighborhood character. This district is a priority for affordable housing.

Downtown

Bloomington's core district that utilizes dense, mixed use development patterns. This area has been designated to be enhanced or expanded in future development. Housing demand for this district is strong especially among the student population. Future residential development should prioritize increasing density and use incentive programs that increase occupancy and affordability at all income levels.

Neighborhood Residential

These types are built-out, homogenous neighborhoods that include some vacant tracts of land. It is primarily composed of residential land uses with densities of 2-15 units per acre. Development is limited to remodeling and constructing new single-family homes. In limited cases multi-family development may be appropriate. Future development will focus on building community focal points and transportation linkages that decrease travel times through multiple modes of transit to other areas of the City. There will also be support for programs that increase owner-occupancy and affordability at all income levels.

Urban Village Center

The Urban Village Center is a neighborhood-scaled, mixed-use node serving retail, business, and service destinations for neighborhood residents. Development is mixed-use including residential. Urban Village Centers will mostly consist of new construction and will include multi-family development and consideration will be given for affordable housing set asides. Priority will be placed on providing public transit to and from these neighborhoods.

a. Land Availability

Planning for future land use is particularly important for a community that has a limited amount of land available with a growing population. As described in the demographics section of this report, the City's population has grown 20.7% from 2000 to 2017. During this time the City has been unable to aggressively expand the amount of land available to accommodate this growing population. This has driven up land costs – local builders conveyed that affordable housing development is nearly impossible, due to land costs which can comprise up to 30% of their costs.

With such high land costs, the City needs to be prepared to support the purchase of land in the development process in order to build more affordable housing. One mechanism for supporting development through reduced land costs is a community land trust. A community land trust is a non-profit with part or all of the board appointed by the Mayor and/or City Council that purchases land to be owned by the City. The City then leases this land to developers, often for a long period such as 99 years for a low fee under the stipulation that at least part of the new units developed will be affordable. The City will establish and capitalize a land trust with the purpose of purchasing land for affordable housing development.

The City's population has grown 20.7% from 2000 to 2017, however, it has been unable to aggressively expand the amount of land available to accommodate this growing population. Local builders conveyed that rising land costs have made affordable housing development nearly impossible from a fiscal standpoint.

With such high land costs, the City needs to be prepared to support the purchase of land in development process in order to build more affordable housing. The City will establish and capitalize a land trust with the purpose of purchasing land for affordable housing development.

b. Transportation

The Plan also recognizes the importance of multi-modal transportation to decreasing the cost of living for residents while increasing their quality of life. Strategies set forth in the Plan include street designs that are consistent with a Complete Streets Policy that allow for car, bus, and bike use. The City will also develop a plan to expand transit services for more days and hours of operation and increased service areas. Accessibility to transit stops will also be addressed with more sidewalk access. The City is also seeking to understand and enhance standards for traffic maintenance and ADA compliance. One of the Plan's explicit goals is to improve public transit by maintaining, improving, and expanding an accessible, safe, and efficient public transportation system.

There are three policies designed to support this goal:

- 1) Support public transit access to regional destinations.
- 2) Encourage the provision of seating, lighting, and signage (including real-time arrival information) at transit stops to increase rider comfort, safety, and convenience.
- 3) Support the adoption and use of technologies that reduce emissions of greenhouse gases and pollutants from vehicles.

Stakeholders expressed that transportation is one of the largest barriers to fair housing. Residents who are dependent on public transportation for access to employment and necessities like groceries must live near a bus stop. Stakeholders reported that it often takes up to three hours to do something as simple as purchase groceries when depending on public transit due to bus arrival times. A lack of evening and Sunday service reduces employment opportunities for residents who rely on public transit and are employed or seeking employment in an industry that is primarily driven by shiftwork.

Stakeholders are also concerned that the City's transit system uses metrics that do not fully capture what would be considered success from a rider's perspective, such as passenger miles and wait times at bus stops. Without these metrics, the transit system will continue to underserve those most dependent on it for access to other areas of the City, and while the Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing fair housing opportunities. The City's next update to the Comprehensive Plan needs to include policies that will coordinate public transit with current and planned affordable housing and the development of metrics that will adequately capture whether or not the transit system is adequately serving the most

vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores.

While the City's Comprehensive Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing fair housing opportunities.

The City's next update to the Comprehensive Plan needs to include policies that will coordinate public transit with current and planned affordable housing and the development of metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores. The City will make efforts to include these policies to the extent possible.

vii. Zoning

Bloomington's Unified Development Ordinance (UDO) codifies the City's land use. The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

a. Date of Ordinance

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

The last update to the UDO went into effect July 20, 2018. The City is currently in the process of designing and approving additional updates in response to needs and strategies identified in the most recent Comprehensive Plan update. Proposed updates include more residential districts to fill the gap between districts with large and small lot sizes and a mixed-use student housing district.

b. Residential Zoning Districts

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

Because members of the protected classes are often in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

Bloomington has six residential- zoning types as outlined in the figure below. These residential zoning types allow for a variety of housing development including single-family attached, multi-family, and trailer park housing. The least dense zoning is Residential Estate (RE) which allows for approximately 0.4 housing units per acre. The densest is Residential High-density Multi-family (RH) which allows for 30 units per acre.

As illustrated in the City's zoning map, the majority of residential land is zoned for Residential Single-family (RS) which, at 8,400 square feet per lot, has a maximum density of approximately 5.2 units per acre. While RS areas allow single-family attached units, they are only allowed as a conditional use and it is limited to only two units where each unit must occupy its own lot. The downtown core and adjacent areas of Bloomington are denser than the single-family oriented areas surrounding it, allowing for mixed use development with multifamily units above the ground floor. Outside the downtown core is Residential Core zoned land which is primarily single-family detached housing with a maximum density of approximately 6.05 units per acre.

Downtown Bloomington is zoned for Downtown Commercial (CD) is mixed use development allowing for residential units above ground floor commercial space. This allows for increased residential density near the City's shopping, restaurant, and employment centers. While the mixed-use nature of the City's downtown and adjacent area provides a wide array of housing options close to amenities and job centers, stakeholders were concerned that, because these areas are in high demand, they were unaffordable to low-income residents.

Much of the higher density Residential Multi-family (RM) zoned areas, which allow up to 30 units per acre, are in the northeastern part of the City near the university. This is likely occupied primarily by students leaving a significant portion of the City's multi-family stock unavailable for long-term City residents – an issue that was frequently echoed by stakeholders. Residential High-density Multi-family (RH) areas that are 30 units per acre are more spread across the City; however, occupy much less land area compared to the single-family oriented zones. RH zoned areas are more likely to be in impacted areas, leaving less choice for residents relying on this type of housing outside areas of minority and LMI concentration. Because these denser multi-family units tend to be more affordable, it is essential that they be given the opportunity to be developed in a wide array of locations across the City.

**Figure 4-5
Residential District Types**

Residential Zoning Districts	Principal residential uses	Use	Minimum Lot Size	Maximum Density per Acre
RE	Residential Estate	Single-family (detached)	108,900 sq. ft.	0.4 units
RS	Residential Single-family	Single-family (detached)	8,400 sq. ft.	5.2 units
		Single-family (attached)		
RC	Residential Core	Single-family (detached)	7,200 sq. ft.	6.05 units
RM	Residential Multi-family	Multi-family	21,780 sq. ft.	21 units
		Single-family (detached)		
		Single-family (attached)		
RH	Residential High-density Multi-family	Multi-family	21,780 sq. ft.	30 units
		Single-family (detached)		
		Single-family (attached)		
MH	Manufactured/Mobile Home Park	Mobile Home Park	4,000 sq. ft.	10.89

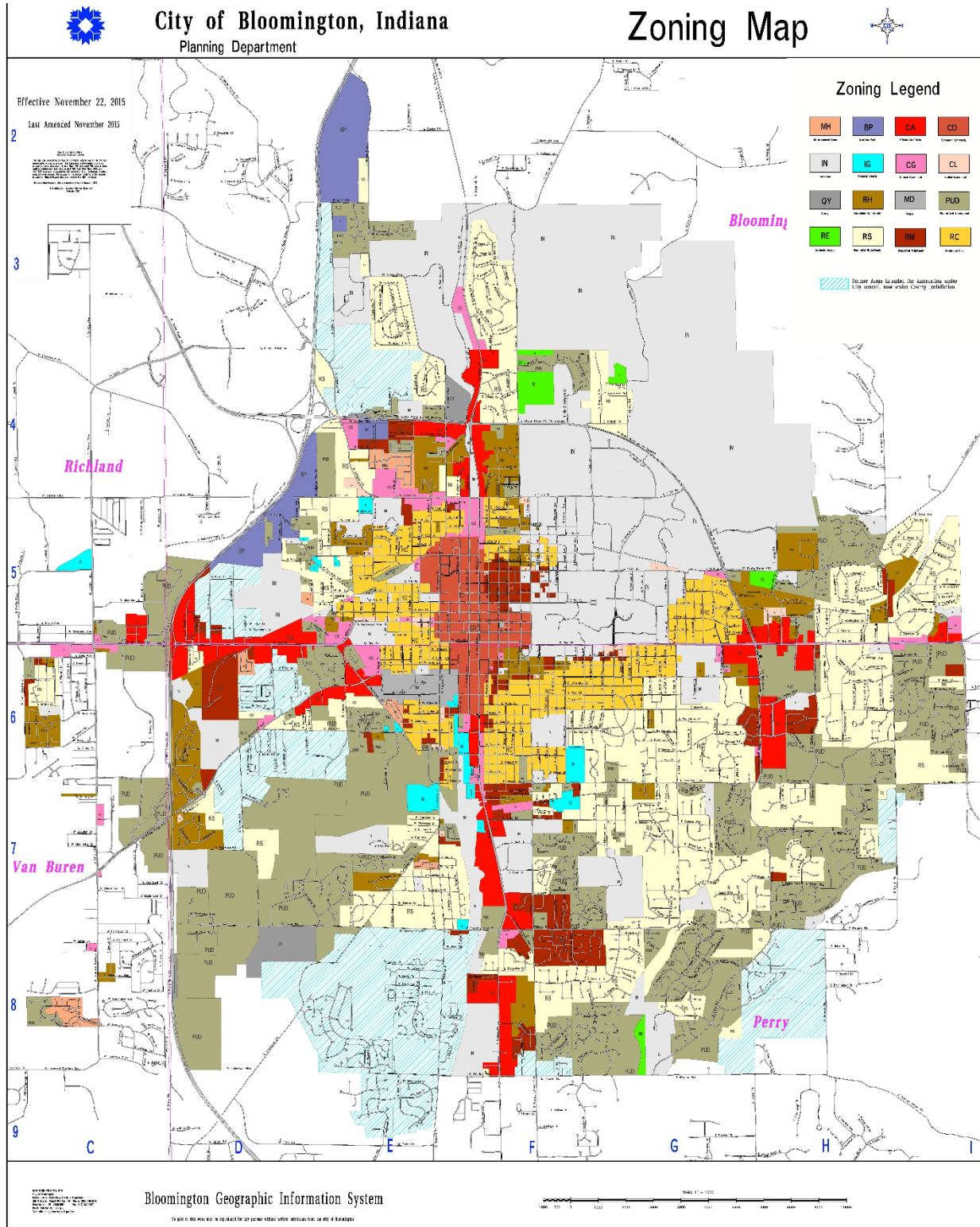
Under the UDO homes in the RE, RS, and RC zoned areas are allowed to build Accessory Development Units (ADU) as a conditional use. This allows density in these areas to increase and provide a potential source of income to households that want to rent out their ADU structure. While not as effective as building multi-family housing, this is a potential source of increased affordable housing on a small scale.

Stakeholders frequently stated that multi-family housing is difficult to build in Bloomington in part due to neighborhood residents resisting new developments that do not fit the “character” of the neighborhood. This makes it difficult to build new multi-family units outside where they traditionally have existed. New multi-family development is also restricted to areas serviced by public transportation. With such a small portion of Bloomington that allows larger multi-family developments – and much of that occupied by students – the City will work to identify some single-family centric zoning districts to allow for increased density and the development of multi-family housing.

The majority of Bloomington’s residential land is zoned for single-family use. While there are large sections of the City that allow some mixed-use, multi-family development, stakeholders were concerned that most of these units were going to students and are often unaffordable to low-income residents.

The City will increase the land that is available for potential multi-family development by rezoning land or changing some single-family centric zone types to allow for the development of some multi-family units.

Map 12
Zoning Map of Bloomington



c. Planned Unit Development and Special Overlay Districts

Bloomington has several Planned Unit Development (PUD) districts spread throughout the City. The UDO defines the intent of PUDs is:

“to encourage flexibility in the development of land in order to promote its most appropriate use; to improve the design, character and quality of new developments; to encourage a harmonious and appropriate mixture of uses; to facilitate the adequate and economic provision of streets, utilities, and city services; to preserve the natural, environmental and scenic features of the site; to encourage and provide a mechanism for arranging improvements on sites so as to preserve desirable features; and to mitigate the problems which may be presented by specific site conditions.”

The Comprehensive Plan seeks to encourage more mixed-use development when appropriate with PUDs being one mechanism that will allow this to occur.

d. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

Bloomington’s UDO defines family as:

“an individual or a group of people all of whom are related to each other by blood, marriage, or legal adoption, and any other dependent children of the household. In the RE, RS, and RC zoning districts, and in single-family residential portions of planned unit developments, "family" also includes a group of no more than three adults, and their dependent children, living together as a single housekeeping unit in a dwelling unit or a combination of a single family dwelling unit and accessory dwelling unit. In all other districts, "family" also includes a group of no more than five adults and their dependent children, living together as a single housekeeping unit in a dwelling unit.”

This definition is consistent with the Fair Housing Act.

e. Regulation of Group Homes

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

Bloomington’s UDO allows group care homes in all districts; however, no group care home may be less than 3,000 feet away from any other group care home. By putting a

distance constraint on group care homes, this provision of the UDO is violating fair housing law. Group care homes must be allowed in any location as any other home without additional constraints such as the requirement that they cannot be near other group homes. The City must change this section of the UDO to eliminate any distance constraints between group care homes.

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B. Private Sector Policies

i. Mortgage Lending Practices

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

The most recent mortgage data available is for Monroe County from 2015 to 2017. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the County. Information is by primary applicant only. Loan data is analyzed by race, ethnicity, and income; however, some groups are excluded from this analysis due to a small number of total applications. Analysis will focus primarily on Whites, Blacks, Asians, and Hispanics by income. The table below provides mortgage applications and denials of all groups by income level.

In Monroe County there were a total of 4,648 mortgage applications from 2015 to 2017. Out of these applications, 421 or 9.1% were denied by the lending institution. Whites accounted for 87.4% of all applications with upper income Whites comprising 51.1% of applications. Lower income applicants – those whose income was below the household median – were denied 13.0% of the time compared to 6.2% of upper income applicants. Lower income Hispanics were most likely to be denied a loan with a denial rate of 14.3% followed by lower income Blacks with a denial rate of 13.9%. Income is the primary factor affecting denial as no race or ethnicity is denied at unusually high rates even if they are high-income.

Figure 4-6
Mortgage Denials by Race and Income, 2015 - 2017

	Income Level*	Applications	Denials	% Denied
White	Lower Income	1,768	217	12.3%
	Upper Income	2,296	136	5.9%
Black	Lower Income	36	5	13.9%
	Upper Income	53	2	3.8%
Asian	Lower Income	59	8	13.6%
	Upper Income	106	5	4.7%
Native Hawaiian or Other Pacific Islander	Lower Income	5	2	40.0%
	Upper Income	4	1	0.0%
Native American	Lower Income	4	1	25.0%
	Upper Income	12	1	8.3%
Information Not Provided	Lower Income	60	17	28.3%
	Upper Income	133	15	11.3%
Hispanic or Latino	Lower Income	42	6	14.3%
	Upper Income	70	5	7.1%
Total	Lower Income	1,974	256	13.0%
	Upper Income	2,674	165	6.2%
	Grand Total	4,648	421	9.1%

*Data grouped based on if applicant's income was above or below the median for the census tract

Note: Data excludes high-cost mortgages

Source: Consumer Financial Protection Bureau HMDA database, 2015 - 2017

Of the applications that were denied by the lending institution, 304 were provided with a reason for the denial as portrayed in the figure below. The applicant's debt-to-income ratio is the most often cited reason for denial, comprising 27.6% of denials, followed by credit history which comprises 24.3% of denials. Together, these two reasons for denial comprise over half of all denials. These two reasons are most related to current and past household income. For reasons discussed in the demographics section of this report, members of the protected classes are more likely to be low-income. The City will develop partnerships with HUD-certified housing counselors and local lenders to offer homebuyer education and financial literacy programs.

Figure 4-7
Reasons for Mortgage Denial

Denial Reason	#	%
Debt-to-income ratio	84	27.6%
Credit history	74	24.3%
Credit application incomplete	40	13.2%
Other	37	12.2%
Collateral	35	11.5%
Employment history	16	5.3%
Insufficient cash (downpayment, closing costs)	13	4.3%
Unverifiable information	5	1.6%
Total	304	100%

Source: Consumer Financial Protection Bureau HMDA database, 2015 - 2017

Over half of mortgage applications that are denied by lending institutions are denied due to a high debt-to-income ratio and poor credit history.

Because members of the protected classes are more likely to be low-income, the City will develop partnerships with HUD-certified housing counselors and local lenders to offer homebuyer education and financial literacy programs.

ii. High-cost Lending Practices

The widespread housing finance market crisis of past years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

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

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

While the rate of high-cost loans received in Monroe County was low the major factor appears to be income. Out of all mortgages received in Monroe County, 4.4% were high-cost. Among lower income households receiving a mortgage, 6.3% received a high-cost loan compared to 3.0% of upper income households. Lower income Black and Hispanic applicants were most likely to be given a high-cost loan with 8.8% and 7.7% of all approved loans, respectively. For lower income White applicants, the rate was 6.5%.

While a low rate of high-cost mortgages is not bad for Bloomington, it could be a function of other issues in the City. With housing prices rising rapidly and incomes stagnating, it could be that many households are either not applying or are being denied outright rather than receiving a high-cost loan. Any type of mortgage assistance program or counseling program for low-income households will also seek to prevent them from receiving a high-cost loan in order to decrease the likelihood of neighborhood destabilization.

Figure 4-8
High-cost Loans by Race and Income, 2015 - 2017

	Income Level*	High-cost Originations	Total Originations	Percent High-cost
White	Lower Income	108	1,659	6.5%
	Upper Income	71	2,231	3.2%
Black	Lower Income	3	34	8.8%
	Upper Income	2	53	3.8%
Asian	Lower Income	-	51	0.0%
	Upper Income	1	102	1.0%
Native Hawaiian or Other Pacific Islander	Lower Income	-	3	0.0%
	Upper Income	-	3	0.0%
Native American	Lower Income	1	4	25.0%
	Upper Income	-	11	0.0%
Information Not Provided	Lower Income	4	47	8.5%
	Upper Income	3	121	2.5%
Hispanic or Latino	Lower Income	3	39	7.7%
	Upper Income	1	66	1.5%
Total	Lower Income	116	1,834	6.3%
	Upper Income	77	2,586	3.0%
	Grand Total	193	4,420	4.4%

*Data grouped based on if applicant's income was above or below the median for the census tract

Source: Consumer Financial Protection Bureau HMDA database, 2015 - 2017

5. Current Fair Housing Profile

A. Progress Since Previous AI

Bloomington's last AI was completed in 2015. In the 2015 – 2019 AI, there were seven impediments to fair housing identified, which Bloomington then established a fair housing action plan to address.

1. Gaps in transportation provision to key areas of affordable housing.
2. Gaps in Transportation to critical health and education sites
3. Lack of affordable rental units
4. Conditions of privately held single room occupancy (SROs)
5. Conflicts in funding for emergency providers. Knowledge and coordination of how to access to the system.
6. Environmental contamination in development areas.
7. Perception of affordable housing/section 8

In response to the identified impediments, Bloomington has taken steps to alleviate or eliminate them where possible. A review of the most recent CAPERs reveals that the City provided affordable housing to 116 households and rental assistance to 43 households. In addition to housing assistance, Bloomington has conducted housing rehab of low-income rental units, assisting 28 households. The City has also updated its comprehensive plan to include a section on affordable housing. The City Council also created an affordability task force. The City is currently in the process of finalizing a new transportation plan. One of the elements of this plan is the expansion of multi-modal transportation in order to increase transportation options for LMI residents in Bloomington.

B. Current Fair Housing Laws

Bloomington has substantially equivalent fair housing laws which expands on the protections offered by State and Federal laws to include sexual orientation, gender identity, veteran status, and housing status. The same law establishing fair housing protections in Bloomington created the City's Human Rights Commission and empowers its director to investigate fair housing complaints and enforce fair housing law when applicable.

**Figure 5-1
Fair Housing Protections**

Protected Class	Federal Fair Housing Protections	Indiana Civil Rights Protections	Bloomington Fair Housing Protections
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability Status	•	•	•
Sexual Orientation			•
Gender Identity			•
Veteran Status			•
Housing Status			•

C. Current Fair Housing Activities

BHRC provides several avenues for the public to learn about fair housing and address concerns of discrimination. BHRC also collaborates with other community agencies including several legal services organizations in order to keep the community informed of the process of addressing any human rights concerns. The Executive Director of BHRC also attends quarterly realtor meetings in order to give talks on fair housing topics. She is also attempting to organize tenant meetings for the same purpose but has had difficulty reaching large numbers of people so far. BHRC also distributes a monthly fair housing newsletter.

BHRC conducts preventative work through its contact with members of the public, for example, if it receives a call from a tenant about possible fair housing violations, BHRC writes a letter to the landlord describing their fair housing responsibilities. After receiving a letter, the landlord often complies with fair housing law, circumventing the need for an investigation and enforcement. BHRC has also focused on eviction cases in order to prevent discriminatory evictions.

BHRC has not conducted any testing recently, in part because there was recent statewide testing conducted by ICRC. In recent correspondence with HUD, it was strongly suggested that paired testing be conducted. BHRC will engage a qualified housing enforcement organization to conduct paired testing in an effort to identify discriminatory practices in the rental housing market.

The City's other departments, including HAND and BHA also conduct fair housing activities. These activities include staffing and assisting boards that are related to fair housing and public outreach and education. The City also has a rental inspection program where landlords must register and be inspected every three to five years to prevent dangerous and unsanitary living conditions for tenants. It also requires landlords provide tenants' rights and responsibilities form to be signed by new tenants.

While this is not a direct fair housing activity, it does ensure members of the protected classes are not disproportionately deprived of livable housing. The registry is also an opportunity to add a fair housing component. The City will add fair housing educational elements to its landlord registry program such as training for landlords and the provision of educational materials to tenants by landlords. This will

help ensure both landlords and tenants are educated about their rights and responsibilities to fair housing.

From June 2017 to January 2018, there was a correspondence between Bloomington and HUD reviewing the City's fair housing program. Through its correspondence with Bloomington, HUD found the City's efforts to provide fair housing activities, outreach, and enforcement to be satisfactory.

BHRC has not conducted any testing recently. In recent correspondence with HUD, it was strongly suggested that paired testing be conducted.

BHRC will engage a qualified housing enforcement organization to conduct paired testing in an effort to identify discriminatory practices in the rental housing market.

The City has a rental inspection program where landlords must register and be inspected every three to five years to prevent dangerous and unsanitary living conditions for tenants. It also requires landlords provide tenants' rights and responsibilities form to be signed by new tenants.

The City will add fair housing educational elements to its landlord registry program such as training for landlords and the provision of educational materials to tenants by landlords.

D. Fair Housing Survey

An online resident survey was conducted as part of the community outreach for the Analysis of Impediments to Fair Housing Choice and the five-year Consolidated Planning processes. Both documents are required by HUD in order for the City of Bloomington to remain in compliance with the Community Development Block Grant and HOME Partnerships Investment programs. The following is an overview of the results.

The survey was made available in English and Spanish. Of the 428 responses received, only six individuals responded to the Spanish version.

Double digit responses were received from residents of Bryan Park (38), Prospect Hill (22), Near West Side (19), Eastside (18), Elm Heights (13) and Park Ridge East (13). These represented 29% of all responses.

A total of 25 students responded: 20 from Indiana University and 5 from Ivy Tech Community College.

The first section of the survey posed questions on housing discrimination. Of the 336 responses to the question asking if respondents had experienced discrimination in their search for housing in Bloomington:

- 49 (14.6%) reported they felt they had been discriminated against
- Another 12 (3.6%) were unsure
- Among those who answered "yes" or that they were unsure:

- 34 (72.3%) identified the landlord or property manager as the person who may have discriminated against them
- Additional responses included a real estate agent (5), persons living in the neighborhood (4) and a lending institution

Specific locations where discrimination was reported to have occurred included:

- An apartment complex (19 or 41.3%)
- A neighborhood with mostly single-family homes (17 or 37%)
- A trailer or mobile home park (2 or 4.4%)
- Public housing or other subsidized housing (1 or 2.2%)

Familial status was the most common basis for discrimination (18 or 41%) followed by:

- Housing status (8 or 18.2%)
- Race (7 or 16%)
- Color of skin (5 or 11.4%)
- Sex (5 or 11.4%)
- Disability (5 or 11.4%)
- Sexual orientation (2 or 4.6%)
- Veteran status (1 or 2.3%)

Of the 61 respondents who reported they had been discriminated against, or were unsure if they had been discriminated against, only 2 reported the discriminatory behavior (to the City of Bloomington). Among the remaining 59 who did not report the behavior, the following were reasons provided by respondents as to why they did not report the behavior:

- 18 (41.2%) didn't think it would make a difference
- 9 (21%) didn't know who to file a report or compliant with
- 4 (9.3%) thought it was too much trouble to report it
- 1 (2.3%) was afraid of retaliation
- 11 (25.6%) offered a variety of other reasons

Respondents were asked if they had ever been denied "reasonable accommodation" requests by a landlord. (A reasonable accommodation is a change in a rule, policy, practice, or service that may be necessary to allow a person with a disability the equal opportunity to use and enjoy a dwelling. One example of a reasonable accommodation is a landlord allowing a person with a disability to install an entrance ramp in order to get into a dwelling unit.) Fifteen respondents replied yes to this question and another 14 respondents replied that they were not sure. Although seemingly a low number, the 15 respondents who replied that they had been denied a reasonable accommodation by a landlord are potentially 15 individuals who may have been denied housing because of a disability.

When asked what respondents would do if they felt they had been discriminated against in their search for housing:

- 96 (32%) would report the discriminatory behavior
- 80 (29.7%) would do nothing and continue to look for other housing
- 69 (23%) wouldn't know what to do
- 34 (11.3%) would tell the person that they were behaving in a discriminatory manner
- 9 (3%) would file a complaint with a lawyer

Twelve respondents (4%) provided other actions that they would take or had taken. Two of these are noteworthy. One respondent stated, "While I would like to report discrimination, I don't believe the

process is easily accessible". This opinion is a clear indication of a need for continuing fair housing education and outreach to tenants and potential tenants. Another respondent described their encounter with a landlord who wanted to charge a higher rent for children. The respondent "chose to talk it out with the landlord...and after some push back he [the landlord] decided not to charge us extra for children". This incident indicates a continuing need for fair housing education and outreach to landlords. Both tenants and landlords turnover constantly within a rental market, especially in a university town. Frequent education and outreach by the City can provide regular opportunities for tenant households to become better educated about their fair housing rights and landlords to become better educated about their fair housing obligations.

6. General Fair Housing Observations

The following observations were noted throughout the previous sections of the AI. These issues are based on the primary research collected and analyzed and the numerous interviews and focus group sessions conducted for this report. They help to establish context for the impediments included in the following section. While none of these observations individually rose to the level of an impediment to fair housing choice in City of Bloomington, the issues remain noteworthy in that they establish context for subsequent sections of the AI.

1. **Bloomington's minority residents comprise nearly 20.0% of the City's population has grown significantly increasing by 82.9% since 2000.**

One of the major contributing factors to this growth is the University of Indiana's Bloomington Campus, which is attended by over 40,000 students across a range of diverse backgrounds.

2. **An area of minority concentration is any census tract where the population is at least 25.9% racial or ethnic minorities.**

There are four census tracts in Bloomington that meet this threshold.

3. **The median household income in 2017 for Black households (\$27,232) was equivalent to only 76.4% of the median household income of White households (\$35,643). Asian households are disproportionately represented in the lowest income group, due to a large proportion of them being students, with almost 65% earning less than \$25,000 annually.**

Stakeholders reported that income data reported by the census may be misleading due to the large student population.

4. **The City has four census tracts that are classified as areas impacted by concentrations of minority and LMI residents.**

Two of the City's four areas impacted by the overlapping concentration of LMI and minority residents are likely comprised primarily by students due to their proximity to the University. The other two, however, are impacted in the more traditional sense – minority concentrations affected by high rates of poverty that tend to be intergenerational—rather than merely low-income students who will receive higher incomes after getting a college degree.

5. **In Bloomington, 9.8% of the population reported at least one disability in 2017. The poverty rate for those with a disability is 35.0% compared to 37.8% of those with no disability.**

Generally, it is expected that the poverty rate among the disabled population to be higher than those without a disability, however, it is possible that among the University's more educated workforce is a larger number of disabled persons. These persons would drive the poverty rate of the disabled population lower.

- 6. Families comprised over half of households in the County but only 39.4% of households in Bloomington – likely due to the large university population. From 2000 to 2017, the percentage of family households increased by 15.2%.**

Married-couple households with children fell by 2.1% in Bloomington, however, Female-headed households with children in Bloomington grew by 28.7% and male-headed households with children grew by 45.0%.

- 7. In Bloomington, 12.1% of residents are foreign-born. In 2017, almost 53% of children under 18 were living below 200% of the poverty level. Of those, 19.4% were children living in homes with at least one foreign-born parent.**

The largest foreign language group that does not speak English “very well” is Chinese, which is spoken by 2.57% of city residents. Spanish is the second largest percentage at 0.99%. Korean, Japanese, and other Asian languages combined account for 1.47% of the population.

- 8. Blacks are more likely than other groups to be unemployed in Bloomington with an unemployment rate of 15.3% compared to 7.4% for Whites.**

Additionally, Female workers are more likely to be unemployed than males, facing an unemployment rate of 8.4% compared to males at 7.1%.

- 9. The City has a vacancy rate of 9.5%, 59.0% of which is its rental stock, which is likely the result of a large, seasonal student population.**

The majority of Bloomington’s housing stock is renter-occupied, multi-family units. These types of units can provide a more affordable option for residents, particularly in impacted areas. Multi-family units comprise over three-quarters of the rental market.

- 10. The proportion of Blacks, Asians, and Hispanics who are homeowners increased from 2000 to 2010.**

In 2017, the proportion of Blacks, Asians, and Hispanics homeowners fell slightly from their high-water marks in 2010. Black homeownership declined from 15.7% to 15.4% while Asian homeownership dropped from 15.7% to 14.8%, and Hispanic homeownership dropped from 21.3% to 20.6%.

- 11. The rate of foreclosure in Bloomington was 0.01% in 2018 or 1 in every 1,919 homes which is lower than the Indiana statewide rate of 0.03%.**

With fewer foreclosures than what is occurring across much of the rest of Indiana, Bloomington has a market that appears to have recovered from the foreclosure crisis that affected much of the country after the 2008 housing crisis.

- 12. In 2010, the most current year available, over 60.0% of Black households and Hispanic households, and over 50.0% of Asian households were families with three or more persons compared to 46.5% of White households.**

In Bloomington, only 25.6% of rental units had three or more bedrooms in 2017, down slightly from 26.4% in 2010. By contrast, two-bedroom units increased slightly from 2010 to 2017.

- 13. Real median housing value fell 2.7% from 2000 to 2017 in Bloomington, while median gross rent rose 7.7% as a result of increasing demand for student rental housing.**

Median household income in Bloomington decreased 9.1%.

- 18. Bloomington's inventory of units renting for less than \$700 a month declined by 3,315 units between 2010 and 2017.**

In contrast, the higher end of the rental market expanded by 4,366 units renting for more than \$700 a month. Coupled with a declining median household income, the rental housing market is becoming more out of reach for lower income households.

- 19. In Bloomington, the FMR for a two-bedroom apartment in 2018 was \$920. The annual income required to make this rent affordable (no more than 30% of monthly income) is \$36,800.**

This required an annual income of 111.0% of the City median household income.

- 20. A household earning the median income in Bloomington can only afford to purchase a house that is 61.1% of the median valued home in Bloomington. This figure is slightly higher for the median earning White household (66.1%), but decreases significantly for Black (49.1%), Asian (14.2%), and Hispanic (56.5%) households.**

The income needed for the median valued home in Bloomington to be considered affordable is at least \$52,080. The City's median income is 63.7% of this amount. Black household income is 52.3% of this amount and Hispanic household income is 59.3%.

- 21. Generally, the most common of the four housing problems is cost burden – spending more than 30% of household income on housing.**

More than half of renters were cost burdened (61.1%). Black households are disproportionately more likely to be cost burdened at 72.4% of renters, however, 63.3% of White renters and 56.9% of Hispanic renters were also cost burdened.

7. Impediments to Fair Housing Choice

A. Public Sector

1. Many of the City's affordable housing options are located inside areas impacted by both concentrations of LMI and minority residents.

All of the City's public housing units are located in impacted areas, which likely serves to increase the concentration of minorities and low-income residents. In addition, stakeholders stated Housing Choice Vouchers (HCV) are generally only accepted by a few landlords within the City, which leads HCV users to find housing outside of Bloomington or to focus their housing search within the few neighborhoods where vouchers are accepted.

The City invests some of its CDBG funds in the impacted areas for housing activities such as rehabilitation. However, opportunities for new affordable housing outside of these neighborhoods will be identified in efforts to expand housing choice for members of the protected classes.

Proposed Action 1: The City will include a map of impacted areas in its local HOME application process and strongly encourage development of new affordable housing outside of impacted neighborhoods.

Proposed Action 2: The City will seek to invest in new affordable housing projects outside of impacted areas by providing additional HOME funds.

2. The City's Language Access Plan is out of date.

The City's Language Access Plan provides sufficient language access resources for Spanish-speaking persons; however, a review of the most recently available census data finds that the largest limited English proficiency population in the City is Chinese-speaking. While many of these residents are presumed to be college students, some may be eligible for City programs and services. In order to provide opportunities to this group, the City will expand its current language access resources to include offering language assistance for Chinese-speaking residents.

Proposed Action 1: The City will conduct a new four factor analysis to identify additional resources that may be needed for its LEP Chinese-speaking population who may be eligible for programs and services. The City will then take steps to provide those resources.

3. Development of new and affordable multi-family housing is difficult for a variety of reasons and has restricted the amount and location of new housing.

The City's population has grown 20.7% from 2000 to 2017, however, it has been unable to aggressively expand the amount of land available to accommodate this growing population with diminishing land available for new development. Local builders conveyed that rising land costs have made affordable housing development nearly impossible from a fiscal standpoint. With such high land costs, the City needs to be prepared to support the purchase of land as part of the development process in order to build more affordable housing. This could be accomplished with the establishment of a Community Land Trust.

A community land trust (CLT) is a non-profit entity with part or all of the board appointed by the Mayor and/or City Council that purchases land to be owned by the City. The CLT leases this land to developers, often for a long period such as 99 years for a low fee under the stipulation that all new units developed will be affordable. A community land trust (CLT) is a nonprofit organization that acquires land, usually

through donation or purchase, for the intent of creating new affordable housing. This tool offer a more feasible path to affordable housing development because the cost of land, which the CLT owns for a long period or in perpetuity, is removed from the total housing development costs. Using such a tool will allow the City to take a more proactive role in shaping Bloomington's future development and ensuring affordable housing is a key element. This structure removes the high cost of land from the total development costs, making it more attractive for development.

The location of affordable housing development is restricted by Bloomington's zoning map. The majority of Bloomington's residential land is zoned for single-family use. While there are large sections of the City that allow some mixed-use, multi-family development, stakeholders were concerned that most of these units were developed specifically for college students and are unaffordable to low-income residents. New development is also restricted by the presence of NIMBYism where residents are concerned with neighborhood character and historical preservation. While these are not necessarily superficial concerns, they cannot be allowed to entirely restrict the development of new housing in a City where the population is increasing and land availability is severely limited. In order to overcome this problem, the City will work to identify parcels and increase the amount of land available for affordable multi-family development available for non-student households.

Proposed Action 1: The City will work to establish and capitalize a community land trust with the purpose of acquiring land for affordable housing development with a long-term period of affordability.

Proposed Action 2: The City will work to identify some single-family centric zoning districts to allow for increased density and the development of multi-family housing.

4. Public transportation limits housing choice among the protected classes.

While the City's Comprehensive Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing fair housing opportunities.

Stakeholders expressed that transportation is one of the largest barriers to housing choice. Residents who are dependent on public transportation for access to employment and necessities like groceries must live near a bus stop. Stakeholders reported that it often takes up to three hours to do something as simple as purchase groceries when depending on public transit due to frequency of bus service and bus routes. A lack of evening and Sunday service reduces employment opportunities for residents who rely on public transit and are employed or seeking employment in an industry that is primarily driven by shiftwork and weekend hours.

Stakeholders are also concerned that the City's transit system uses metrics that do not fully capture what would be considered success from a rider's perspective, such as passenger miles and wait times at bus stops. Without these metrics, the transit system will continue to underserve those most dependent on it for access to other areas of the City. While the Plan includes affordable housing elements it does not include strategies or policies to link affordable housing to other areas of the City through public transit. By excluding public transit where there are plans for affordable housing and excluding affordable housing where there is public transportation, the City is not adequately providing housing choice for all residents. The City's next update to the Comprehensive Plan needs to include policies that will coordinate public transit with current and planned affordable housing and the development of metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores and health care.

Proposed Action 1: The City will work with the transit authority to develop metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores and health care.

Proposed Action 2: The City's next update to the Comprehensive Plan will include procedures to coordinate public transit with existing and planned affordable housing.

5. Bloomington's regulation of group homes is not consistent with fair housing laws.

Bloomington's Unified Development Ordinance (UDO) allows group care homes in all districts; however, no group care home may be located less than 3,000 feet from any other group care home. By putting a distancing requirement on group care homes, this provision of the UDO is inconsistent with fair housing law.

Proposed Action 1: The City will amend the UDO's regulation of group homes to eliminate the distancing requirements between group care homes.

6. The City lacks certain fair housing programs that could be leveraged to more affirmatively further fair housing.

While Bloomington Human Rights Commission (BHRC) has many fair housing activities, including outreach, education, and investigation of complaints, it has not conducted any paired testing recently. In recent correspondence with HUD, it was strongly suggested that paired testing be conducted. BHRC will work to identify a qualified housing enforcement organization to conduct paired testing in Bloomington in an effort to identify discriminatory practices in the rental housing market.

The City also has a rental inspection program where landlords must register and be inspected every three to five years to prevent dangerous and unsanitary living conditions for tenants. It also requires landlords provide tenants' rights and responsibilities forms to be signed by new tenants. The rental inspection program is fair housing activity in that it is a City sponsored program implemented to ensure that lower income residents are not deprived of safe, livable and affordable housing. Members of the protected classes (minorities, people with disabilities, families with children, etc.) comprise a large segment of rental households in Bloomington. The City will add mandatory fair housing training to the landlord registry – either during a landlord's initial registration or to occur periodically – and provide updated fair housing educational material during each inspection. Landlords will also be required to provide fair housing educational material to new tenants. This will help ensure both landlords and tenants are educated about their fair housing rights and responsibilities.

Proposed Action 1: BHRC will engage a qualified housing enforcement organization to conduct paired testing in an effort to identify discriminatory practices in the rental housing market.

Proposed Action 2: The City will add fair housing educational elements to its landlord registry program such as training for landlords and the provision of educational materials to tenants by landlords.

B. Private Sector

1. **Income and credit were major factors in mortgage approvals. While not directly linked to race, these are factors that disproportionately affect minorities.**

Over half of mortgage applications that are denied by lending institutions are denied due to a high debt-to-income ratio and poor credit history. Low-income home buyers were also more likely to receive high-cost loans.

Proposed Action 1: The City will develop partnerships with HUD-certified housing counselors and local lenders to offer homebuyer education and financial literacy programs.

8. Fair Housing Action Plan

Action Description	Timeframe				
	2020	2021	2022	2023	2024
Create Housing Opportunities Outside Impacted Areas					
The City will include a map of impacted areas in its local HOME application process and strongly encourage development of new affordable housing outside of impacted neighborhoods.	●				
The City will seek to invest in new affordable housing projects outside of impacted areas by providing additional HOME funds.	●	●	●	●	●
The City will work to establish and capitalize a community land trust with the purpose of acquiring land for affordable housing development with a long-term period of affordability.					●
The City will work to identify some single-family centric zoning districts to allow for increased density and the development of multi-family housing.					●
Update City Ordinances					
The City will conduct a new four factor analysis to identify additional resources that may be needed for its LEP Chinese-speaking population who may be eligible for programs and services. The City will then take steps to provide those resources.		●			
The City will amend the UDO's regulation of group homes to eliminate the distancing requirements between group care homes.		●			
Address Public Transportation Issues					
The City's next update to the Comprehensive Plan will include procedures to coordinate public transit with existing and planned affordable housing.					●
The City will work with the transit authority to develop metrics that will adequately capture whether or not the transit system is adequately serving the most vulnerable populations that depend on it for access to jobs, City services, and amenities like grocery stores and health care.	●	●	●	●	●
Update Fair Housing Practices					
BHRC will engage a qualified housing enforcement organization to conduct paired testing in an effort to identify discriminatory practices in the rental housing market.			●	●	●
The City will add fair housing educational elements to its landlord registry program such as training for landlords and the provision of educational materials to tenants by landlords.	●				
Partner With Private Sector					
The City will develop partnerships with HUD-certified housing counselors and local lenders to offer homebuyer education and financial literacy programs.	●				

9. City of Bloomington Signature Page

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the City of Bloomington is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

John Hamilton, Mayor

Date

10. Appendix

Figure A-1
Population by Race, 2017

	Total Population	White	Black	Asian/Pacific Islander	Hispanic*	Total Minority
Census Tract 1, Monroe County, Indiana	5,541	87.5%	1.9%	5.0%	3.6%	12.5%
Census Tract 2.01, Monroe County, Indiana	6,533	69.2%	3.3%	22.3%	4.0%	30.8%
Census Tract 2.02, Monroe County, Indiana	6,431	77.5%	3.3%	10.0%	6.4%	22.5%
Census Tract 3.01, Monroe County, Indiana	4,159	84.7%	5.4%	3.3%	4.4%	15.3%
Census Tract 3.02, Monroe County, Indiana	3,207	94.6%	1.1%	3.3%	0.3%	5.4%
Census Tract 4.01, Monroe County, Indiana	4,186	79.8%	4.8%	2.7%	9.1%	20.2%
Census Tract 4.02, Monroe County, Indiana	4,724	79.3%	4.7%	6.5%	5.2%	20.7%
Census Tract 5.01, Monroe County, Indiana	4,570	89.6%	2.6%	1.6%	2.0%	10.4%
Census Tract 5.02, Monroe County, Indiana	3,487	80.8%	2.5%	0.6%	8.3%	19.2%
Census Tract 6.01, Monroe County, Indiana	3,983	71.1%	13.5%	2.6%	1.4%	28.9%
Census Tract 6.02, Monroe County, Indiana	3,461	80.4%	5.1%	5.6%	2.7%	19.6%
Census Tract 7, Monroe County, Indiana	3,021	92.4%	1.5%	0.6%	0.9%	7.6%
Census Tract 8, Monroe County, Indiana	5,794	84.4%	0.6%	8.8%	3.3%	15.6%
Census Tract 9.01, Monroe County, Indiana	3,262	73.4%	1.0%	17.5%	5.6%	26.6%
Census Tract 9.03, Monroe County, Indiana	5,262	80.0%	2.9%	7.7%	4.1%	20.0%
Census Tract 9.04, Monroe County, Indiana	5,442	59.1%	3.6%	32.6%	1.8%	40.9%
Census Tract 10.01, Monroe County, Indiana	5,621	82.0%	6.9%	6.8%	2.2%	18.0%
Census Tract 10.02, Monroe County, Indiana	6,032	79.8%	2.1%	10.1%	5.1%	20.2%
Census Tract 11.01, Monroe County, Indiana	5,914	73.5%	8.5%	7.0%	5.6%	26.5%
Census Tract 11.02, Monroe County, Indiana	4,595	76.0%	8.6%	5.5%	6.8%	24.0%
Census Tract 11.03, Monroe County, Indiana	2,976	93.5%	0.3%	0.0%	2.3%	6.5%
Census Tract 13.01, Monroe County, Indiana	5,780	93.0%	1.3%	2.0%	1.0%	7.0%
Census Tract 16, Monroe County, Indiana	5,532	86.0%	1.9%	7.1%	3.5%	14.0%

* Hispanic ethnicity is counted independently of race

Note: Blue shaded rows are areas of minority concentration

Source: 2013 – 2017 American Community Survey (B03002)

Figure A-2
LMI Residents by Census Tract, 2017

Census Tract	Number of LMI	Total Population	LMI Percent
Census Tract 1	4,575	5,541	82.6%
Census Tract 2.01*	1,000	6,533	15.3%
Census Tract 2.02	185	6,431	2.9%
Census Tract 3.01	3,390	4,159	81.5%
Census Tract 3.02	1,820	3,207	56.8%
Census Tract 4.01	1,280	4,186	30.6%
Census Tract 4.02	1,505	4,724	31.9%
Census Tract 5.01	1,220	4,570	26.7%
Census Tract 5.02	680	3,487	19.5%
Census Tract 6.01*	1,540	3,983	38.7%
Census Tract 6.02	670	3,461	19.4%
Census Tract 7	650	3,021	21.5%
Census Tract 8	1,645	5,794	28.4%
Census Tract 9.01*	1,350	3,262	41.4%
Census Tract 9.03	1,095	5,262	20.8%
Census Tract 9.04*	4,775	5,442	87.7%
Census Tract 10.01	515	5,621	9.2%
Census Tract 10.02	50	6,032	0.8%
Census Tract 11.01*	3,240	5,914	54.8%
Census Tract 11.02	1,325	4,595	28.8%
Census Tract 11.03	2,715	2,976	91.2%
Census Tract 13.01	2,145	5,780	37.1%
Census Tract 16	3,215	5,532	58.1%

* Area of Racial Concentration

Note: Blue shaded rows are areas of LMI Concentration

Source: HUD 2018 LMI Estimates based on 2011 - 2015 American Community Survey

Figure A-3
Percent Change in Housing Units, 2010 - 2017

Census Tract	Housing Units 2010	Housing Units 2017	Percent Change
Census Tract 1	2,353	2,655	12.8%
Census Tract 2.01	855	148	-82.7%
Census Tract 2.02	220	55	-75.0%
Census Tract 3.01	2,194	2,202	0.4%
Census Tract 3.02	1,324	1,288	-2.7%
Census Tract 4.01	2,017	2,261	12.1%
Census Tract 4.02	2,298	2,540	10.5%
Census Tract 5.01	2,020	2,061	2.0%
Census Tract 5.02	1,493	1,371	-8.2%
Census Tract 6.01	1,734	2,022	16.6%
Census Tract 6.02	1,440	1,536	6.7%
Census Tract 7	1,327	1,288	-2.9%
Census Tract 8	2,784	2,789	0.2%
Census Tract 9.01	1,318	1,227	-6.9%
Census Tract 9.03	2,556	2,713	6.1%
Census Tract 9.04	2,416	2,432	0.7%
Census Tract 10.01	2,092	2,318	10.8%
Census Tract 10.02	2,821	2,839	0.6%
Census Tract 11.01	2,747	2,803	2.0%
Census Tract 11.02	1,835	2,008	9.4%
Census Tract 11.03	1,337	1,299	-2.8%
Census Tract 13.01	2,104	2,496	18.6%
Census Tract 16	2,296	2,464	7.3%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons

Source: Census Bureau, 2010 Decennial Census (SF1); 2013 - 2017 American Community Survey (B25032)

Figure A-4
Percent Multi-family Housing, 2017

Census Tract	Total Housing Units	Single-family	Multi-family	Percent Multi-family
Census Tract 1	2655	416	2239	84.3%
Census Tract 2.01	148	11	137	92.6%
Census Tract 2.02	55	9	46	83.6%
Census Tract 3.01	2202	1184	1018	46.2%
Census Tract 3.02	1288	966	322	25.0%
Census Tract 4.01	2261	1158	1103	48.8%
Census Tract 4.02	2540	992	1548	60.9%
Census Tract 5.01	2061	1571	490	23.8%
Census Tract 5.02	1371	1139	232	16.9%
Census Tract 6.01	2022	1122	900	44.5%
Census Tract 6.02	1536	690	846	55.1%
Census Tract 7	1288	1280	8	0.6%
Census Tract 8	2789	1640	1149	41.2%
Census Tract 9.01	1227	654	573	46.7%
Census Tract 9.03	2713	870	1843	67.9%
Census Tract 9.04	2432	1087	1345	55.3%
Census Tract 10.01	2318	1925	393	17.0%
Census Tract 10.02	2839	1880	959	33.8%
Census Tract 11.01	2803	1527	1276	45.5%
Census Tract 11.02	2008	1397	611	30.4%
Census Tract 11.03	1299	1200	99	7.6%
Census Tract 13.01	2496	2362	134	5.4%
Census Tract 16	2464	706	1758	71.3%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons.

Source: Census Bureau, 2013 - 2017 American Communitys Survey (DP04)

Figure A-5
Homeownership Rate by Race, 2017

Census Tract	Percent White Homeowners	Percent Black Homeowners	Percent Asian Homeowners	Percent Hispanic Homeowners
Census Tract 1	4.7%	100.0%	0.0%	19.5%
Census Tract 2.01	0.0%	0.0%	0.0%	0.0%
Census Tract 2.02	8.8%	0.0%	0.0%	0.0%
Census Tract 3.01	29.6%	0.0%	0.0%	0.0%
Census Tract 3.02	61.0%	0.0%	0.0%	0.0%
Census Tract 4.01	38.6%	0.0%	0.0%	16.2%
Census Tract 4.02	29.0%	6.3%	23.2%	35.7%
Census Tract 5.01	59.6%	15.9%	21.3%	31.8%
Census Tract 5.02	68.7%	100.0%	100.0%	100.0%
Census Tract 6.01	36.5%	20.2%	11.6%	45.8%
Census Tract 6.02	27.7%	0.0%	0.0%	0.0%
Census Tract 7	87.7%	0.0%	0.0%	100.0%
Census Tract 8	58.6%	44.8%	12.8%	18.7%
Census Tract 9.01	42.2%	59.1%	4.1%	16.0%
Census Tract 9.03	28.2%	22.9%	0.0%	31.3%
Census Tract 9.04	58.3%	0.0%	11.8%	0.0%
Census Tract 10.01	80.8%	53.9%	76.2%	0.0%
Census Tract 10.02	65.6%	11.0%	58.9%	32.2%
Census Tract 11.01	36.6%	13.4%	28.7%	31.9%
Census Tract 11.02	53.3%	30.4%	74.6%	66.3%
Census Tract 11.03	83.6%	0.0%	0.0%	100.0%
Census Tract 13.01	86.1%	0.0%	0.0%	90.2%
Census Tract 16	2.6%	0.0%	0.0%	0.0%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons.

Cells denoted with - mean no persons of that race living in census tract

Source: 2013 – 2017 American Community Survey (B25003, B25003A, B25003B, B25003D, B25003I)