

Please revise the response to include a discussion as to how each view expressed and/or comment received was addressed. If comments were not addressed, provide goals to improve the Community Participation Process (III.4)

The City has accepted all constructive comments and views received to date through the planning process. Some comments and views included personal attacks. These were not accepted. The comments below have been summarized into three broad categories of “Issues”, “Recommendations”, and “Other Comments/Remarks”. In addition, the City received written comments which are included as attachments to the plan.

Issues - Housing General

- Children who grow up in Hammond and go to college do not return
- Housing stock is not attractive; too many vacant buildings
- Greater Hammond sees large amounts of overcrowding – 3 or 4 families sharing one unit
- High rates of predatory lending
- How is foreclosures affecting renters?
- There are concerns about administration of Code Enforcement. Many of those cited cannot afford to make repairs, cannot afford fines. Is there a connection between code enforcement and rehabilitation programs offered?
- Feels that non-residents (Illinois residents) are benefitting from city services

City Response: The City concurs that there are several significant issues within its neighborhoods relating to housing in general. These include issues with vacant properties, the difficulty some owners have with property maintenance, and consumer education related to foreclosure and predatory lending. The goals of this plan were designed to address many of these specific issues.

Issues - Fair Housing

- South Suburban feels that all forms of discrimination are under-reported. Possible solution is to promote fair housing resources.
- HHC should work with SHHC. Substantial testing recommended for REOs and rentals. South Suburban has a DPA model they are willing to share
- Greater Hammond feels there is a high level of NIMBYism to new affordable housing unless its senior housing
- Northwest Indiana Reinvestment Alliance has a list of properties to do fair housing outreach but encounters a lot of resistance from management companies.
- Renaissance residents call Hammond Human Relations Commission with anonymous tips. Afraid of retribution

- Recommends analyzing mortgage lending and HMDA data, especially for African Americans
- Recommends promoting Hammond's diversity. This should be viewed as an asset.
- People in bad circumstances are being discriminated against
- City is discriminating against landlords renting to Section 8 voucher holders

City Response: The City concurs that housing discrimination is most likely under-reported. A coordinated outreach effort among fair housing advocates in the area could increase reporting. Coordination of enforcement can also help ensure available resources are best utilized. The City disagrees that there is a high level of NIMBYISM to new affordable housing within the City. The City did include an analysis of HMDA data as part of the planning process.

Issues - Persons with Disabilities / Seniors

- Persons with disabilities experience disparate treatment in housing search/application process. Need emergency housing for persons with disabilities. Persons with disabilities (especially those coming out of shelter system) have extremely hard time finding housing
- Lack of accessible housing exists. Forces people into nursing homes. Existing ADA plan to does not adequately speak of needs in community (access to housing and community facilities)
- City should be given credit for improvements to infrastructure, but there are issues with access to commercial properties (stores)
- Need to support aging in place for seniors. Older housing stock is not accessible to persons with disabilities. Seniors complain about lack of loans and grants. Seniors have to leave their homes when they cannot afford repairs. Need to publicize the availability of any programs and funding available to help seniors age in place

City Response: The City concurs with the comments made regarding the needs for persons with disabilities and seniors. The City is considering additional study of ADA access of commercial properties within the City.

Issues - Public / Assisted Housing

- Issue with Section 8 voucher holders finding housing within Hammond. Hammond rent standards are based on Gary rents instead of Chicago. Voucher holders have issues finding available housing in both City and County programs.
- Voucher program should not be permanent for persons who are able to work. Would prefer if it was a self-sufficiency program
- Public housing is shutting down two developments (continued redevelopment of Columbia Center). Is concerned about the relocation of these residents
- There is a concentration of publicly assisted housing. Recommends de-concentration, mobility vouchers, and "source of income" protections

City Response: The City concurs with the comments made regarding public and assisted housing issues. The City is following potential regulatory changes which should increase the rent

standards for Hammond, thereby making it easier for Housing Choice Voucher holders to find units within the City. The City understands the concern that some residents have about the loss of assisted units within Columbia Center. However, this is better characterized as redevelopment rather than the “shutting down” of developments. Columbia Center’s older units were obsolete and needed to be replaced. In regard to the concentration of assisted housing, the City feels that Columbia Center serves as an asset to its neighborhood and does not have a deleterious effect. In regard to the concentration of assisted units within the RECAP, the City has added a goal to this plan to specifically address the needs of RECAP residents. The City will consider source of income protections for voucher holders.

Issues - Access to Transportation

- Bussing is needed.
- When public transit funding decisions were made (transfer of bus service to regional provider)? How was impact on protected classes analyzed when transit funding decisions were made? What steps has the City made to recoup assets invested in the bus service? How will people access the South Shore extension?
- There is a lack of public transit, especially to employment centers like the hospital and casino. Should conduct a transit study. Cited that it takes a long, circuitous route on bussing to get from Columbia Center to the hospital.

City Response: The City concurs that more affordable transportation options are needed to serve its residents, but also recognizes that the previous transit system was underutilized.

Issues - Access to Education

- Education index provided by HUD is a concern. Families will not want to move to Hammond if these statistics are correct. Can HUD provide funding for education / improvements to educational system? Feels there is a need to supplement data
- Need to address the school system. Is Private Schools or more charter schools the answer? What needs to happen to fix?
- School has open boundaries, meaning kids from outside of the City can attend. About 350 kids from outside the City take advantage of this. School feels this leads to new residents.
- School has made large gains in terms of graduation rate in the last few years. Up to 81%; up 20 points from few years back
- Feels a stronger positive relationship/partnership between school and city would be beneficial. Create a forum to promote positive things happening in school
- Safety is a concern. Partnership would help ensure safety of kids

City Response: The City concurs with the concerns raised about education. Based on data and testimony received from the school district representatives, the City feels the data sets provided by HUD did not sufficiently describe the proficiencies of the City schools.

Recommendations

- What makes people want to invest in Hammond? Sees a difference in how properties are cared for in Hammond vs other communities, specifically cited NIPSCO. Everyone needs to pull together to solve problems of this magnitude
- Need to work with local banks to ensure access to credit
- Talk to eviction court
- for education and marketing: use social media; use outside parties
- More data/discussion regarding employment centers would help. More data/discussion regarding housing needs in terms of tenure
- Look into Miller Trust programs
- South Suburban would like to see similar indexes for subsidized housing
- South Suburban recommends looking at race & income index and exposure index
- NWIRA thinks study should focus on Lake County
- Look at trends in Robertsdale
- South Suburban feels there is a lack of counseling availability
- In regard to poor school rankings, Maywood school had effective program that was discontinued.
- Woodmar should be redeveloped into housing
- Would like to see more hotels.
- Would like to see housing on 40 foot lots
- Would like to see more multifamily housing
- Would like to see more middle range/higher end housing

City Response: Where feasible, the City will incorporate these recommendations into its action plans to address its fair housing goals.

Other Comments / Remarks

- How does one adopt a lot or start a community garden?
- Need more living wages in the City
- Availability of rent to own programs in Hammond
- We Care has prevented a lot of preventions in E Chicago.
- South Suburban feels that there should be more RECAPs in Hammond. Columbia Center?
- Hessville has changed to a “Hispanic” neighborhood
- Hammond is a destination for Hispanic immigrants because of family who have moved to Hammond
- Concerns over the data quality of ACS data/high margins of error

City Response: Community Development staff present at the public meetings provided information to residents interested in adopting lots and starting community gardens, and rent to own programs within the City. Community Development staff made it known that it has an open door policy to provide additional information to residents interested in its programs or community development-related efforts. In regard to comments on the number of RECAPs and data quality, the City was instructed to use HUD's data and definitions. Based on HUD's definition, there is only one RECAP within the City.

City Response to Attachments: The City appreciates the constructive comments and critiques it received through the public meetings and comment periods. The City did not find the personal attacks on its staff and elected officials helpful in anyway. The City will provide additional public comment opportunities for the fair housing plan as part of its planning process for its Consolidated Plan.

In regard to the comments made by the Chicago Area Fair Housing Alliance (CAFHA), the City's Citizen Participation Plan is not in draft form. The Plan has been adopted by the City Community Planning and Development Department and was used for the development of the plan. The City acknowledges that there was not much time between the close of the comment period and the deadline submission, but the City feels it complies with its participation plan and provided more than adequate opportunities for all interested parties to comment on the proposed plan. If CAFHA had issues with finding information on the City's website, it would have better served the City and its residents if CAFHA called the City staff and asked for the information instead of waiting until the last moment to let its concerns be known. Finally, the City maintains it took notes of all comments made at public meetings and summarized those comments above, despite the claims made in CAFHA's letter. CAFHA was not present at any meeting. The comments above were summarized by issues and recommendations. Those comments that did not seem to fall into either category were grouped under "Other Comments/Remarks". This categorization does not qualify these comments in any way other than they were considered an issue or a recommendation. CAFHA's only involvement in the entire process was the submission of written comments a few days before the end of the process.

In regard to the comments made by the South Suburban Housing Center (SSHC), the City appreciates the efforts that SSHC made to the process, including attending multiple public meetings and focus groups. The City does take issue with some of the points made in SSHC's comments. First, the letter states SSHC was not given adequate time to present the testimony it prepared. While the City tried to limit each participant's speaking time during the first hearing in an effort to give everyone an opportunity to speak, the City invited SSHC to speak during the second public meeting and set no time limit on its presentation. As stated above, the City adopted a citizen participation plan and followed it. This allowed adequate opportunity for interested parties to comment. In regard to the 3 minute limitation on comments, the City made it clear that the Community Development Department has an open door policy and was willing to meet with anyone who would like to speak further. In regard to the short period of time between the close of the public comment period and the submission of the plan, the City has incorporated many of the issues and goals that SSHC has proposed in its final plan. Moreover, the City would like to work closely with SSHC in order to implement the plan. From the tone of its letter and its

recommendations SSHC seems more willing to monitor the City's efforts than act as a true partner in serving the City's residents.

2. Please revise the response to include an analysis of those protected class groups who disproportionately reside in R/ECAPS within the jurisdiction as compared to the region (V.B.ii.1.b).

Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

In terms of demographics, the RECAP's population is predominantly Black Non-Hispanic (52%), followed by White Non-Hispanic (28%), and Hispanic (18%). Of the 1,118 households, 367 are families (33%), 65% are householders living alone. The RECAP does not have a large foreign born population. Based on the data in Table 4, the country with the largest representation within the RECAP is Mexico, which accounts for 29 people or approximately one percent of the area's population.

Compared to the City's demographics, the RECAP has more than double the percentage of Black Non-Hispanic residents (52% to 22%), a lower percentage of White Non-Hispanics (28% to 42%), and a lower percentage of Hispanic residents (18% to 34%). According to HUD Table 1, the City only has one fairly large foreign born population. Mexican immigrants (7,397 residents) account for about nine percent of the population. Based on the data provided, these immigrants are under-represented within the RECAP. Families with children are also under-represented within the RECAP.

Compared to the region's demographics, the RECAP has more than three times the percentage of Black Non-Hispanic residents (52% to 17%), roughly half the percentage of White Non-Hispanics (28% to 55%), and roughly the same percentage of Hispanic residents (18% to 20%). In terms of national origin, Mexico is the largest source of foreign born residents within the region. Mexican immigrants account for seven percent of the total population, totaling 670,150 persons. Poland (139,517 residents) and India (117,387) are the second and third largest contributors of foreign born residents in the region, respectively.

3. Please revise the response to include an analysis of new immigrant groups which may not be English proficient (V.B.ii.1.c)

When reviewing the demographics for the RECAP from the 1990 to 2010 U.S. Census, a number of trends emerge. First off, the poverty rate has remained consistently high. In 2010, this area had the highest poverty rate in the City at 67%. Overall, the area's population decreased by 992, a drop of 31%, and the areas' number of single family units decreased by 336 (46%), primarily from the demolition of blighted homes that had fallen into disrepair. In 2010, 154 of the total units (13%) were reported as vacant. The population decline, however, was not consistent among racial and ethnic categories. White Non-Hispanic population decreased by 1,183 (65%) while the Black Non-Hispanic actually increased by 383 (48%). These trends fit within the "white flight" narrative.

The RECAP does not have a large foreign born population. Based on the data in Table 4, the country with the largest representation within the RECAP is Mexico, which accounts for 29 people or approximately one percent of the area's population. While HUD did not provide data on Limited English Proficiency for the RECAP, it is safe to assume there is not a large LEP population within the RECAP given the extremely small percentages of foreign born residents.

4. Please assess how residency patterns by race/ethnicity/national origin, and limited English proficiency relate to the location of schools with good ISTEP scores. For example, the response states that the ISTEP scores ranged from 33.8 to 54.8, but does not discuss how the differences in scores related to protected classes or residency patterns (V.B.iii. 1.a.ii).

Attendance and standardized test data for elementary schools in the School City of Hammond district was examined (source: 2015-2016 Indiana Department of Education data). While the school data displayed residency patterns, most between White and African American populations, **there was no corresponding pattern among the test scores.**

The table below includes 2015-16 ISTEP+ pass rates by elementary school, ordered by the school’s passing rate, highest to lowest. The highest values of the other columns are highlighted in green while the lowest values are highlighted in orange. Based on this data set, the four schools with the highest scores have a relatively high portion of White students. Two of lowest scoring schools have African American majorities. There is not a high correlation between test scores and Hispanic, free and reduced lunch, or English learners. The average passing rate of elementary schools in Indiana was 54% meaning that all elementary schools in Hammond fell below average.

School	Pct Hisp	Pct White	Pct Black	Pct Other	Free / Reduced Lunch	English Learners	2015-16 ISTEP+ Pass Rate	RANK
Jefferson	41%	26%	26%	7%	61%	8%	44%	1
Hess	39%	23%	34%	4%	75%	7%	42%	2
Franklin	64%	29%	5%	2%	72%	14%	41%	3
Harding	46%	25%	24%	5%	74%	12%	41%	4
Lafayette	39%	3%	53%	5%	94%	13%	40%	5
Lincoln	73%	13%	8%	6%	75%	24%	39%	6
Edison	50%	17%	26%	7%	84%	14%	38%	7
Morton	47%	22%	24%	7%	70%	13%	37%	8
Columbia	62%	9%	22%	7%	91%	24%	36%	9
Obannon	31%	18%	46%	5%	87%	6%	36%	10

Irving	80%	6%	11%	3%	83%	29%	33%	11
Wallace	46%	5%	45%	4%	84%	20%	28%	12
Kenwood	30%	11%	55%	4%	65%	9%	28%	13
Maywood	20%	3%	73%	4%	86%	5%	20%	14

5. Please analyze which racial/ethnic, national origin, or family status groups are least successful in accessing employment (V.B.iii.1.b.iii).

The Labor Market Index is a HUD-provided measure of labor force participation. The higher the index, the more success that a group has at accessing employment opportunities. Based on the information on HUD Table 12, every race and ethnicity at the City level scores lower on the Labor Market Index compared to the region as a whole. The scores at the City level range from 21 (Black, Non-Hispanic) to 37 (Asian, Non-Hispanic). Asian is the only category over 26. HUD did not provide this data for national origin. Given that Mexico is the only sizable foreign born population within the City, the City will use the index for Hispanic as a proxy for national origin. For the region, indices range from 27 (Black, Non-Hispanic) to 72 (Asian, Non-Hispanic). **In this regard, the issue of accessing employment opportunities for the City’s residents is more geographic in nature rather than disparate access based on race or ethnicity.**

If household income is used as a measure of access to employment, African American households are less successful at accessing employment. Thirty four percent of African American households earn less than \$20,000 compared to 21% of White Non-Hispanic and Hispanic households.

	African American	White-Non Hispanic	Hispanic
Less than \$20,000	2,215	2,925	1,621
\$20,000 to \$50,000	2,408	4,873	3,187
\$50,000 to \$100,000	1,327	4,561	2,426
\$100,000 or more	477	1,608	588
Source: Household Income 2014 ACS 5 Year Estimates			

In terms of family status (families with children), it should be noted that single parent families are more likely to be in poverty, which is an indicator the household is not successful in accessing sufficient employment. The presence of children and the number of parents within are

strong determinants on the poverty status of a family. Single-parent households with children under 18 years are much more likely to be in poverty than married-couple families with children or families with children under 18. According to the 2014 ACS, single parent households with children accounted for 59% of the families in poverty in Hammond. Among African American households in poverty, 86% are single parent households with children under 18. Based on this information, any type of self sufficiency and anti-poverty programs should be designed to support and assist single parent families with children.

In summary, the HUD data analyzed shows that geography has a role in access to employment. Residents in the region as a whole had much better access than City residents. When looking at additional data sets that can be used as a measure of access to employment, African American households have lower incomes and families with children are more likely to be in poverty.

6. Please revise the response to include an analysis of the relationship between resident patterns of racial/ethnic, national origin, and family status groups and their exposure to poverty (V.B.iii.1.d.ii).

At a regional level, Map 14 clearly depicts a geographic pattern related to exposure to poverty. The southern portions of Chicago and the southern suburbs have a high concentration of households with a high exposure to poverty. Within Hammond, the patterns are not as pronounced, but the City does fit within the regional pattern where the portions of the City further from the metro center have lower exposure to poverty. The map also shows a correlation between race and exposure to poverty. At the regional level, White Non-Hispanics clustered away from the metro center have lower exposure to poverty while African American Non-Hispanics are clustered in areas with high exposure to poverty. Hammond fits within this overall pattern to an extent, but the City is more integrated than its neighbors and has less variance in the exposure to poverty at the census tract level than the region. Based on the HUD data, the City did not identify any geographic patterns or relationships between poverty and national origin or poverty and families with children.

7. Please revise the response to include an analysis of the relationship between resident patterns of racial/ethnic, national origin, and family status groups and their exposure to LOW poverty (V.B.iii.1.d.iii)

At a regional level, Map 14 clearly depicts a geographic pattern related to exposure to poverty. The southern portions of Chicago and the southern suburbs have a high concentration of households with a high exposure to poverty. Within Hammond, the patterns are not as pronounced, but the City does fit within the regional pattern where the portions of the City further from the metro center have lower exposure to poverty. The map also shows a correlation between race and exposure to poverty. At the regional level, White Non-Hispanics clustered away from the metro center have lower exposure to poverty while African American Non-Hispanics are clustered in areas with high exposure to poverty. Hammond fits within this overall pattern to an extent, but the City is more integrated than its neighbors and has less variance in the exposure to poverty at the census tract level than the region. Based on the HUD data, the City did not identify any geographic patterns or relationships between poverty and national origin or poverty and families with children.

In summary, based on the information presented in Table 12 and Map 14, African Americans at the regional level are the most effected by exposure to poverty. This pattern holds to some extent within the City, but the relative difference between races and ethnicities at the City level is much smaller.

8. Please revise the response to include an analysis of overarching patterns in disparities in access to opportunity based on race/ethnicity, national origin, and family status (V.B.iii.1.f.i)

Overall, there is a higher correlation with geography and patterns to access to opportunity than between protected classes and access to opportunity. Based on HUD's data, Hammond fits within a large regional pattern where residents closer to the metro center have less access to opportunity relative to the outlying areas of the metro area. Much of the discussion at the community meetings focused on the disparities presented in the opportunity indices. The community meetings also focused on the inadequacy of public transportation, especially for persons with disabilities. The lack of public transportation has been an often cited issue since the termination of City-funded bus service in 2010 due to fiscal considerations.

9. Please revise the response to include an analysis of the capacity of organizations that provide fair housing information, outreach, and enforcement. Include a discussion of the Hammond Human Relations Commission (V.E.3)

The City's Human Relations Commission is a testament to the City's commitment to fair housing. By investing in the Human Relations Commission, the City of Hammond is one of only fifty-one local governments in the nation to achieve a substantial equivalence certification from HUD, meaning the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act.

In recent years, the Human Relations Commission underwent staff re-organization and almost lost its certification. The Commission is now again under the direction of an Executive Director and has the capacity to administer its fair housing ordinance.

In addition to the Human Relations Commission, Hammond residents are served by the Indiana Civil Rights Commission (ICRC). Like the Hammond Human Relations Commission, the ICRC has also been certified by HUD as substantially equivalent in its capacity to administer fair housing law.

There are also a number of non-profit agencies in the area who play an important role in providing fair housing information, outreach, and enforcement. South Suburban Housing Center (SSHC), located in Homewood, receives HUD funds through the Fair Housing Initiatives Program (FHIP). In recent years, SSHC received funding for comprehensive fair housing enforcement activities in the south Chicago metropolitan region and in underserved areas of northwest Indiana and central Illinois. SSHC has the capacity to undertake complaint intake, strategic testing, systemic investigations, and dispute resolution. Northwest Indiana Reinvestment Alliance is a HUD-approved housing counseling agency that includes fair housing outreach in its services.

10. The response does not include an explanation of how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). The plan needs “SMART” goals. It is recommended to have four fair housing goals (VI.2)

Goal:	Regional Coordination in Testing and Enforcement
Contributing Factor(s):	Private Discrimination Lack of regional coordination
Fair Housing Issue(s):	Private Discrimination is in violation of fair housing law and directly affects all protected classes.
Performance Measure(s):	Ten Fair Housing Complaint investigations each year. Develop specific recommendations for Homebound program Systemic testing of mortgage lending and/or steering of African American homebuyers.
Participant(s):	Hammond Human Relations Commission and partner agencies
Discussion:	There is a need to better coordinate the efforts of all fair housing agencies within the region to ensure that the limited resources available to each are used to their maximum efficiency. The City will continue to support the Hammond Human Relations Commission to investigate instances of private discrimination. When necessary, the Human Relations Commission will coordinate with other fair housing agencies, including South Suburban Housing Center and Northwest Indiana Reinvestment Alliance, to conduct investigations, help with enforcement efforts, and coordinate outreach. The lack of African American Homebound participants purchasing homes in North Hammond and Robertsdale will be further assessed in the first year of this plan and develop specific recommendations to ensure any identified issues are addressed.

The South Suburban Housing Center has the capacity and resources to conduct testing and expressed an interest in working in Hammond.

- Goal:** **Provide Greater Access to Financial Services / Examine Lending Discrimination**
- Contributing Factor(s):** Access to Financial Services
Lending Discrimination
- Fair Housing Issue(s):** Unequal access to financial services and potential lending discrimination has had a disparate impact on minority homebuyers
- Performance Measure(s):** Creation of credit repair program / Individual Development Accounts (IDA)
Systemic testing of mortgage lending.
- Participant(s):** Community Development and Planning Department
Hammond Human Relations Commission and contracted agencies
- Discussion:** Despite the availability of homebuyer counseling, the final metric of loan origination for minority buyers remains disproportionately low. An underlying issue may be poor credit for potential buyers. The City will use available federal resources, such as CDBG and HOME, to administer programs designed to increase homeownership.
The City will sponsor testing of mortgage lending within the City to determine if lending discrimination is occurring.

Goal:	Address disparities in access to opportunities in RECAP
Contributing Factor(s):	Site Selection Policies Deteriorated and abandoned properties Lack of private investment in specific neighborhoods
Fair Housing Issue(s):	Disparate access to opportunity within the RECAP
Performance Measure(s):	Increase availability of public services within the RECAP
Participant(s):	Community Planning and Development Department
Discussion:	The City will coordinate with existing community service providers to better service residents living the RECAP and other areas with relatively high concentrations of minorities and poverty. These programs include services directed at youth development, such as Parents as Teachers, Youthbuild, and Big Brothers/Big Sisters. The City will also explore the use of a new or existing Community Based Development Organization that can lead a coordinated response to the priority needs of RECAP residents.

Goal:	Encourage Redevelopment and Private Investment
Contributing Factor(s):	Deteriorated and abandoned properties Lack of private investment in specific neighborhoods Land Use and zoning laws Site Selection Policies
Fair Housing Issue(s):	Disparate impact on neighborhoods with racial and ethnic concentrations
Performance Measure(s):	Development of 3 new housing units within targeted areas
Participant(s):	Hammond Community Development Department
Discussion:	The City needs to strategically link the redevelopment of new housing units to parcels that are now vacant due to demolition of vacant structures. The City will examine potential strategies to encourage redevelopment of vacant lots with small lot widths and provide funding subsidies for the development of new in-fill housing.

Goal:	Site selection and mobility policies
Contributing Factor(s):	Site selection policies Source of Income discrimination Lack of source of income protection Impediments to mobility
Fair Housing Issue(s):	Concentration of poverty and minority populations into geographic areas with relatively low access to opportunity
Performance Measure(s):	Revised policy on site selection and source of income discrimination
Participant(s):	Hammond Community Development Department
Discussion:	As part of its upcoming Consolidated Plan process, the City will update its policy on site selection for new affordable and subsidized housing. The City will explore the possibility of adding source of income protections to its existing fair housing ordinance.

11. Please revise the response to identify which racial/ethnic, national origin or family status groups are most affected by the lack of reliable, affordable transportation (V.B.iii.1.c.ii).

A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice. The City has very limited public transportation options, meaning that private transportation is necessary to access opportunity. Lack of income is the biggest detriment in accessing affordable transportation. Based on a review of 2014 ACS household income data, presented below and in Attachment #12, African American households are more likely to be disproportionately affected by the lack of public transportation. Thirty four percent of African American households earn less than \$20,000 compared to 21% of White Non-Hispanic and Hispanic households.

As noted in other sections of this plan, persons with disabilities and families with children have greater barriers in accessing transportation and employment. In summary, the protected classes that are most affected by reliable, affordable transportation are African American households, persons with disabilities, and families with children.

	African American	White-Non Hispanic	Hispanic
Less than \$20,000	2,215	2,925	1,621
\$20,000 to \$50,000	2,408	4,873	3,187
\$50,000 to \$100,000	1,327	4,561	2,426
\$100,000 or more	477	1,608	588

Source: Household Income 2014 ACS 5 Year Estimates