

City of Hammond Indiana DRAFT Fair Housing Assessment
09. Publicly Supported Housing Analysis

ANALYSIS PUBLICLY SUPPORTED HOUSING DEMOGRAPHICS

- i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?
- ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

The HUD provided data related to publicly supported housing is included in HUD Tables 5, 6, 7, 8, 11, and 15. The HUD-provided data on publicly supported housing is grouped into five program categories:

- public housing developments;
- project-based Section 8;
- Section 8 tenant-based Housing Choice Vouchers (HCV);
- Other HUD Multifamily housing, including Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities; and
- Low-Income Housing Tax Credit (LIHTC) housing.

Where a housing development includes more than one category of publicly supported housing, this development is reported in data for each housing category (e.g., project-based Section 8 combined with LIHTC). Note that other publicly supported housing programs, for instance those funded through state and local programs or by other federal agencies, such as USDA's Rural Housing Service and the Veteran's Administration, or other HUD programs that are not covered in the HUD-provided data may be relevant to the analysis.

HUD Table 5 provides a total count of publicly supported housing by program category and references the number to the total number of units in the jurisdiction. In Hammond, the majority of publicly supported housing units are provided through the Housing Choice Voucher program. Of the 1,258 supported housing units, 783 are

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Housing Choice Vouchers, representing 62% of the total. From a fair housing perspective, this percentage should be viewed as a positive since vouchers provide the assisted household greater choice in where to live. The remainder of the units are 325 units in public housing developments (26%) and 150 Project-based Section 8 units (12%). It should be noted that these numbers may not accurately reflect the number of public housing units due to current efforts to redevelop Columbia Center. In the consultation with the Hammond Housing Authority (HHA), the total number of units in public housing developments, including Turner Park and American Heartland Homes 1 and 2, was reported at 240.

HUD Table 6 provides race and ethnicity data for each category of publicly supported housing, as well as a breakdown of each race and ethnicity at different income levels that are eligible for housing assistance. In comparing the race and ethnicity of publicly supported housing clients and those of the eligible populations within the jurisdiction, some variations appear.

- For Whites, the composition of public housing (30%) is lower and housing choice vouchers (7%) is drastically lower than the eligible population (39%).
- For African Americans, the composition of public housing (60%), project-based section 8 (40%), and housing choice vouchers (80%) are all significantly higher than the eligible population (25%).
- For Hispanics, the composition of public housing (9%), project-based section 8 (14%), and housing choice vouchers (13%) are all significantly lower than the eligible population (28%).

In consultations with the HHA, data for the public housing developments as of May 2016 was provided. As part of this consultation, there was discussion on why Hispanic participation was low compared to the eligible population. While HHA does provide some print information in Spanish, there is not a Spanish-version of information on the HHA web site. In addition to language barriers, there may be a perception among the Hispanic population, especially foreign-born populations, that they are not eligible for federal housing assistance.

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May 2016 Data	White	Black/AA	Hispanic	Non - Hispanic	Total
Turner Park	74	112	18	168	186
American Heartland 1	11	28	2	37	39
American Heartland 2	1	14		15	15
TOTAL	86	154	20	220	240
Turner Park	40%	60%	10%	90%	100%
American Heartland 1	28%	72%	5%	95%	100%
American Heartland 2	7%	93%	0%	100%	100%
TOTAL	36%	64%	8%	92%	100%

HUD Tables 7 and 8 provides publicly supported housing data based on program type and location within Racially/Ethnically Concentrated Areas of Poverty (RECAP). For each program type, the table provides data on race, ethnicity, and household type.

Public Housing Developments

- 189 units (67%) are located within the RECAP while 93 units (33%) are located outside the RECAP. In consultation with HHA, they feel that the data in HUD Table 7 may be dated based on their redevelopment efforts. According to HHA, there are 186 units in Turner Park, which is located within the RECAP, and 54 units in American Heartland 1 and 2, which is located outside of the RECAP at Columbia Center. Based on these numbers, 78% of the public housing units are located within the RECAP and 22% of the units are outside the RECAP.
- In comparing the data between the RECAP (Turner Park) and non-RECAP (Columbia Center), the RECAP developments have a higher percentage of elderly (22% to 12%), persons with a disability (29% to 15%), and Whites (32% to 27%). The non-RECAP developments have a higher percentage of African Americans (64% to 58%) and families with children (59% to 35%). The percentage of Hispanics is consistent (10% to 9%).

Project-based Section 8 Housing

- According to the HUD table, 147 units are located within the RECAP. Based on local knowledge, the City feels these units represent the 150-unit Hammond Elderly Apartments. 80% of these units are reported as elderly,

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while a higher percentage than other types of public housing were reported as White (46%).

- Two other publicly assisted housing developments that appear on Table 8 but that do not seem to be included on HUD Table 7 are Renaissance Towers and Mount Zion. Renaissance Towers is listed as a HAP property per HUD's Multifamily database with 450 units. Renaissance Towers is located within the RECAP. Mount Zion is a 202 property with 127 1-bedroom units located outside the RECAP.

Housing Choice Vouchers

- HUD Table 7 lists a total of 667 vouchers. Of those, 99% of voucher holders are located outside the RECAP. Only eight voucher holders are reported to be located within the RECAP.
- Of the reported voucher holders, the vast majority are families with children (70%) and African American (80%). Hispanics (13%) and Whites (7%) compose the remainder. A small fraction (5%) are elderly or report a disability (12%).

HUD Table 11 presents data for publicly supported housing data based on program type and unit size. This data is included to determine if a sufficient number of units exist to support the level of demand for units by families with children, which is a protected class under fair housing law,

- For public housing developments, Table 11 shows 141 1-bedroom units (50%), 67 2-bedroom units (24%), and 70 units with three or more bedroom units (25%). The table also shows 43% of the households have children, meaning that are only sufficient larger units if most are occupied by families with children.
- For housing choice vouchers, a greater percentage of the vouchers are used by households with children (70%) who end up selecting larger units. Only 18% of voucher holders selected a 1 bedroom unit. 42% selected 2 bedroom units and 36% selected units with 3 or more bedrooms.

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Low Income Tax Credit Properties

In addition to the developments discussed above, the City of Hammond also has a number of developments funded through Low Income Housing Tax Credits. Of the following list, only one, the 7-unit development on 584 Sibley, is located within the RECAP. The first four developments listed (American Heartland 1 & 2, Saxony Town Homes, and Golden Manor, are clustered around HHA's Columbia Center. Douglas Pointe Apartments, and the two additional properties, 237 Highland and 15 Waltham, are due south of the RECAP near Harrison Park.

Project Name:	Project Address:	Total Units
American Heartland Homes Two	7418 7422 Linden Pl	49
American Heartland Homes One	1402 173rd St	94
Saxony Town Homes	1349 175th St	57
Golden Manor Apts	1201 175th St	80
Sibley	237 Highland St	44
15 Waltham St	15 Waltham St	6
584 Sibley St	584 Sibley St	7
Douglas Pointe Apts I	5525 Hyles Blvd	108
Douglas Pointe Apts II	5525 Hyles Blvd	112
Douglas Pointe Apts III	5525 Hyles Blvd	64

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ANALYSIS PUBLICLY SUPPORTED HOUSING LOCATION AND OCCUPANCY

- i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.
- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?
- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?
- iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.
- v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

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As mentioned in the previous section, there is a concentration of publicly supported housing within the RECAP. The RECAP includes a total of 793 publicly supported units:

- Turner Park: 186 units
- Renaissance Towers: 450 units
- Hammond Elderly Apartments: 150 units
- 584 Sibley St: 7 units

According to the 2014 ACS five year estimates, there are a total of 979 occupied housing units, meaning that of those units, 81% are publicly supported. The three large developments are clustered on the northern portion of the downtown commercial area and are somewhat geographically isolated from other neighborhoods. The downtown area, which is predominantly commercial and institutional is to the south, industrial property in Illinois is to the west, and the Grand Calumet River forms the northern border. Some single family housing is located to the east.

The other large concentration of publicly assisted housing is clustered around Columbia Center. These developments are managed by HHA. The original public housing in Columbia Center, built in the 1940s, was functionally obsolete. In several phases, HHA has replaced the older units with new, less dense units. The condition and quality of the new units has had a dramatic effect on the neighborhood and is considered an asset to the area.

The area due south of the downtown area (and the RECAP) could be considered a third concentration of publicly assisted housing. This area includes Douglas Pointe, 237 Highland, 15 Waltham, and a new Low Income Tax Credit property currently under construction which will serve elderly residents.

The City also analyzed the location of Housing Choice Vouchers provided in the HUD CPD maps GIS system. Nine percent of vouchers chose housing in North Hammond and Robertsdale, located north of the RECAP. Most of the voucher holders (68%) are located in the area south of downtown and west of Indianapolis. While the remainder (23%) located east of Indianapolis. According to this data set, four of the census tracts within Hammond did not have any voucher holders, including the RECAP.

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ANALYSIS DISPARITIES IN ACCESS TO OPPORTUNITY

- i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

In the course of the community meetings held by the City, there was concern voiced that the concentration of publicly assisted housing could be a fair housing issue. The City agrees that the site selection for large affordable housing developments can become a fair housing issue if members of a protected class, such as racial minorities, are disproportionately represented among low-income populations who would benefit from low-cost housing and the housing developments are segregated or located in areas that offer a relative lack of opportunity. In the case of Columbia Center, the Hammond Housing Authority has attracted huge amounts of investment to increase the overall standard of housing and serves as an asset to the surrounding neighborhood.

While the RECAP may be geographically isolated from other neighborhoods, its location does possess some assets as well. The downtown area is an employment center and includes assets such as a strong presence by the First Baptist Church. The City has made significant investments in the downtown area that is starting to attract additional private investment. The Hammond Station on the South Shore Commuter Train is only one mile from the developments. The area also includes open space and recreational areas.

In the course of the community meetings, some residents voiced concern that there was a lack of community services and social services available at Renaissance Towers.

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ADDITIONAL INFORMATION

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.
- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

The Chicago Metropolitan Agency for Planning (CMAP) recently completed a regional fair housing study recently for the Chicago metropolitan region. That report cited resistance to low income housing in predominantly white, higher opportunity communities as a reason behind the clustering of publicly assisted housing in minority areas. The report found that affordable housing is often sited in locations where community opposition is low and where any improvements to the neighborhood and subsidies to neighborhood stakeholders are viewed as positive. This contributing factor fits within the specific narrative of Hammond as well. Earlier, it was shown that very little private development, as measured by the number of permits for new housing units, was occurring in Hammond. In fact, the majority of new units permitted in Hammond in the last several years have been through publicly supported housing development, including the redevelopment of Columbia Center and the new Low Income Tax Credit property under development on Sohl Avenue.

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CONTRIBUTING FACTORS-OF PUBLICLY SUPPORTED HOUSING LOCATION AND OCCUPANCY

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Land use and zoning laws
- Community opposition
- Impediments to mobility
- **Lack of private investment in specific neighborhoods**
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- **Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs**
- Source of income discrimination
- Other