

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Harrisonburg, Virginia

March 2022 Draft

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Introduction & Executive Summary of the Analysis

Why the AI was Developed

Harrisonburg has prepared the Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any unit of government receiving funds through the U.S. Department of Housing and Urban Development (HUD) affirmatively further fair housing (AFFH). Harrisonburg is an entitlement grantee and receives annual allocations through HUD's Community Development Block Grant program.

On June 10, 2021, HUD published the Interim Final Rule to issue new guidance on a HUD grantee's obligation to affirmatively further fair housing. Specifically, the IFR "does not require HUD grantees to participate in a fair housing planning process." However, because grantees remain obligated to certify annually that they are affirmatively furthering fair housing, preparing a fair housing planning document remains the best method for documenting a grantee's analysis and research to demonstrate that it is fulfilling its AFFH obligation. HUD further expanded its guidance to state that grantees "may choose to continue to engage in familiar fair housing planning processes such as continuing to implement a completed AI or AFH, updating an existing AI or AFH, or conducting a new AI or AFH. Grantees may also choose to engage in other means of fair housing planning that meaningfully supports their certification."

Harrisonburg has chosen to prepare an AI to document where racially and ethnically concentrated areas of poverty exist within its jurisdiction, how city policies, programs and laws expand or restrict housing choice for members of the protected classes, any impediments or barriers to fair housing choice that exist, and the actions it will undertake to eliminate the impediments.

Participants

As the lead agency in the preparation of the AI, the Office of the City Manager was committed to an extensive outreach process to solicit input from residents and stakeholders. Outreach initiatives included remote public meetings, remote stakeholder meetings, and an online survey. These included the following:

- Public Meetings:
 - January 11, 2022 City Council Meeting at 7:00 pm
 - April 12, 2022 City Council Meeting at 7:00 pm
- Stakeholder Meetings and Presentations:
 - October 13th from 10:00am-11:00am
 - October 14th from 10:00am-11:00am
 - October 14th from 2:00pm-3:00pm
 - Presentation at the November 15, 2021 meeting of the Harrisonburg Continuum of Care
 - Presentation at the November 17, 2021 meeting of the Harrisonburg Redevelopment & Housing Authority
 - Presentation at the November 17, 2021 meeting of the ALICE Coalition
 - Presentation at the December 14, 2021 meeting of the City Executive Leadership Team

The Participation Appendix includes the documentation of all outreach activities, provides lists of all attendees, and complete summaries of all meetings held in conjunction with the outreach conducted for

the 2022-2026 Consolidated Plan and 2022 Annual Action Plan. The online survey had a low response rate, and no additional analysis was performed on the results as the sample size is too small to be meaningful. The anonymous survey responses are also included in the Participation Appendix.

Methodology Used

A comprehensive approach was used to complete the AI. The following sources were utilized:

- Most recently available demographic data regarding population, race and ethnicity, household, housing, income, and employment
- A variety of online databases providing indicators that reflect local issues and based on research that validates the connections between the indicators and increased opportunity in the City of Harrisonburg
- Public policies, codes, and statutes affecting the siting and development of housing
- Administrative policies concerning fair housing, affordable housing, and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Interviews and stakeholder meetings conducted with state agencies and non-governmental organizations that provide housing and housing related services to members of the protected classes.

2021 Comprehensive Housing Assessment and Market Study

The City of Harrisonburg in 2021 adopted a Comprehensive Housing Assessment and Market Study. This in-depth document identified several barriers to affordable housing, which are also barriers to fair housing choice. The study included a detailed list of 21 recommendations based on the data-driven research and analysis. Many of these recommendations are included in the AI because of their relevance to overcoming impediments to fair housing choice.

How AI was Funded

The AI was funded with City of Harrisonburg CDBG funds.

Progress Achieved Since Previous Assessment of Fair Housing

The goals and actions set forth in the 2017-2021 Assessment of Fair Housing (AFH) were broad and, in some cases, aspirational, meaning that the goals were unlikely to be achieved within a five-year timeframe because of the extent of the resources – human and financial – required to meet the needs. The following table outlines the goals and timeframes defined in the 2016 AFH, as well as provides an update on the progress achieved since then. The information provided below is taken from the 2018, 2019 and 2020 Consolidated Annual Performance & Evaluation Reports (CAPERs) submitted to HUD.

GOALS, RECOMMENDED ACTIONS AND ACCOMPLISHMENTS	
Goal 1: Expand housing choice and access to opportunity.	
Actions	
Continue to maintain a list of local publicly supported developments with expiring subsidies in order to identify partners and potential sources of funding for preservation.	
Work with City planning staff to institute an evaluation of the impact on fair housing choice for every residential development proposal. Restructure existing incentives to encourage proposals that increase the supply of affordable housing in high opportunity areas and/or outside of “concentration areas.”	
HRHA will attempt to reach out to private landlords, particularly those in higher opportunity neighborhoods, to increase participation in the Housing Choice Voucher program. HRHA will maintain a list of "friendly" landlords who have accepted HCVs in the past. HRHA will contact these and other known, non-participating landlords with information about the program, invitations to and public meetings and educational events, direct inquiries about unit availability, etc.	
Accomplishments	
Throughout 2017-2021, the City focused the internal policies, procedures, and management of its CDBG program in a way that efficiently and consistently affirmatively furthers fair housing choice. The Harrisonburg Redevelopment and Housing Authority (HRHA) continued to maintain list of local publicly supported developments with expiring subsidies to identify partners and potential sources of funding for preservation. The City completed a comprehensive housing study in 2021 to determine the effects of residential developments and existing development incentives on fair housing choice. This study will inform the City’s future efforts to further fair housing choice and advance its affordable housing needs. HRHA implemented a landlord incentive and retention program and conducted three landlord training events to address the need for additional landlords to participate in the rental assistance program and also educated them on Virginia’s new “source of income” protected class added in 2020.	
Goal 2: Increase homeownership among low-income households and members of the protected classes.	
Actions	
Within the next five-year planning cycle, create a framework for providing down payment assistance through CDBG and/or HRHA for qualified first-time homebuyers.	
Within the next three years, begin holding annual homebuyer education and financial literacy workshops.	
Accomplishments	

Expanding housing choice by increasing homeownership opportunities is ongoing and will continue to be a goal as the level of need far exceeds available resources. The City partnered with HRHA to begin a down payment assistance program that was funded in PY2018 and PY2020. Three eligible participants successfully became homeowners within the City of Harrisonburg through this partnership. As part of the homebuyer assistance program, the HRHA FSS and Housing Coordinator worked with clients to assess their eligibility for the program and then connect eligible applicants with the Virginia Cooperative Extension for assistance with the VHDA homebuyer education course and DuPont Community Credit Union to receive financial literacy education. The Coordinator also worked one-on-one with clients, on an as-needed basis, to address financial literacy questions.

Goal 3: Improve the utility of public transit for low-income and disabled persons

Actions

Within one year, identify any key community asset or major employer currently underserved by transit service.

Within three to five years, adjust transit routes and schedules to provide improved access to underserved locations within the City, as identified by the Harrisonburg Department of Public Transportation and other City staff.

Within three to five years, work with Rockingham County and key businesses that employ a large number of low-income individuals to attempt to establish improved transportation for these individuals.

Accomplishments

The City’s Department of Transportation continues to adjust transit schedules and routes to provide improved access to underserved locations within Harrisonburg.

Goal 4: Strengthen anti-discrimination investigation, enforcement, and operations

Actions

Within two years, contract with a HUD-certified organization to conduct paired discrimination testing in the rental market.

Within one year, conduct the four-factor analysis to determine the extent to which document translation is needed. Prepare a Language Access Plan if it is determined to be necessary.

Annually train City and HRHA staff to refer callers about fair housing to the designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.

Accomplishments

City staff reached out to HOME of VA, the National Fair Housing Organization, and Piedmont Housing Authority throughout PY18-20 to conduct paired testing. These organizations have been too busy to schedule paired testing for housing discrimination in Harrisonburg. CDBG staff will continue to pursue options to have

fair housing testing done in the city, but there are few leads. In 2019, a more robust language access plan was rolled out for the entire city and access to public meetings was significantly bolstered through additional communication. In June, 2020 the City and HRHA staff were trained in how to refer callers about fair housing issues to the proper person on staff. Staff were also trained to communicate with people with language barriers and were given the tools necessary assist these citizens as needed. Additionally, HRHA staff conducted training and coordination meetings with Virginia Apartment Management Association membership concerning the implementation of the Commonwealth of Virginia’s new “source of income” protected class.

Goal 5: Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the public.

Actions

Within six months, create a page on the City's website for fair housing resources.

Partner with local organizations such as lending institutions, attorneys, realtors, etc. to host a fair housing community forum annually.

Hold an annual fair housing training for elected officials, appointed boards, and department staff.

Accomplishments

The City intended to partner with HRHA through the CDBG program to provide a fair housing forum for local organizations, businesses, and individuals in early 2020. Due to the Covid-19 pandemic, this could not be scheduled. The City and HRHA partnered to hold a Fair Housing Training for Elected Officials, Appointed Boards, and Department Staff in June of 2020. This training was more limited than usual due to the pandemic but included video training materials and pamphlets.

Impediments to Fair Housing Choice

Several impediments to fair housing choice were identified and are described below, most of which were identified in the previous AFH. The impediments are carried over because they are still relevant today. Based on these impediments, a Fair Housing Action Plan with recommendations to be undertaken by the City of Harrisonburg over the next five years was developed and is described in the final section of this analysis.

Impediment: Consistent with the 2016 AFH, a lack of affordable, accessible housing within high opportunity areas remains a barrier that disproportionately affects members of the protected classes.

- Finding affordable housing near essential services is a significant barrier faced by persons with disabilities. Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities, especially if they are transit-dependent.

- Seniors (aged 65+) are one of the major drivers of Harrisonburg’s population. Due to the aging population of Harrisonburg, this lack of affordable, accessible housing will become increasingly important in the future.
- According to the 2021 Comprehensive Housing Assessment and Market Study, there is a “housing mismatch” in Harrisonburg, in which thousands of households live in units that do not align with their income. This housing mismatch has a disproportionately greater impact on lower income households.

Goal: Maintain the creation and preservation of affordable housing development in higher opportunity areas as a City-wide priority.

Impediment: Members of the protected classes are more likely to have lower incomes, higher unemployment rates and higher poverty rates. Limited housing choice restricts access to community assets for members of the protected classes.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts, which reduces housing choice.
- Overall, Harrisonburg continues to have low levels of segregation, though there is a continuing trend toward increased segregation across racial and ethnic minority groups.
- Members of the protected classes are more likely to live in R/ECAPs where housing is more affordable.
- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing.
- While fair housing and affordable housing are distinct from each other, there is a link when affordable housing is not located throughout a jurisdiction, including in higher opportunity areas, housing choice is restricted.

Goal: Remove barriers to accessing community assets for members of the protected classes.

Impediment: Fair housing education and outreach efforts are not adequately meeting need.

- Harrisonburg residents can receive fair housing services from several local agencies, including Housing Opportunities Made Equal, Inc. and Blue Ridge Legal services. These groups provide education and outreach, process fair housing complaints, and connect residents with available resources.
- Insufficient resources make affirmatively furthering fair housing through enforcement, investigation, and outreach extremely difficult.

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

Goal: Strengthen fair housing education, investigation, enforcement, and operations.

Impediment: Members of the protected classes are underrepresented among homeowners.

- Homeownership rates in Harrisonburg have maintained consistent levels of around 38% over the last 19 years. However, there are variations in homeownership rates by racial/ethnic group. Black and Hispanic households are under-represented among Harrisonburg homeowners.
- Low homeowner and rental vacancy rates in Harrisonburg indicate high levels of competition within the housing market as residents compete for scarce units, and where the lowest income households have the fewest options.
- Homeownership has historically been a way for a family to create generational wealth, which allows those families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.

Goal: Increase homeownership among low-income households and members of the protected classes.

Demographic, Income, and Employment Data

This section describes demographic characteristics that affect housing choice among Harrisonburg residents. It provides context for existing conditions and pinpoints issues to inform strategies for broadening the availability of housing opportunities. The U.S. Census Bureau's 2019 American Community Survey (ACS) 5-Year Estimates are the most recent and reliable data source available at the time of this report and have been utilized in all cases, as well as 2010 Decennial Census and 2014 ACS 5-Year Estimates, as appropriate, to provide comparison. Where appropriate, comparisons are made with the findings of the previous 2016 Assessment of Fair Housing (FY2017-2021 AFH) as well as the 2021 Comprehensive Housing Assessment and Market Study prepared for the City of Harrisonburg.

Key Findings

- Harrisonburg experienced consistent population growth between 2000 and 2019, though its rate of growth slowed in the last nine years to less than half of the growth rate experienced in 2000-2010.
- Students and seniors (aged 65+) are the major drivers of Harrisonburg's population growth.
- Racial diversity in Harrisonburg declined slightly between 2010 and 2019, while ethnic diversity increased as a result of an expanding Hispanic population.
- Although employment grew in 2010-2019, the number of jobs in industries with average wages above \$40,000 per year decreased, and wages are largely stagnant.
- Despite overall declining unemployment rates across demographic groups between 2010 and 2019, Black residents continued to experience above-average rates of unemployment.
- In 2019, Harrisonburg's median household income was equivalent to 62.9% of the State median income and 74.3% of the national median income.
- When adjusted for inflation, changes in real household income have varied by race/ethnicity.
- The poverty rate skews higher in the City due to the college student population. Harrisonburg's poverty rate was just over 28% in 2019. Removing the college-age households of 19-24 years old from the equation lowers the poverty rate to 14%, higher than the State rate of 10.6% but comparable to the national poverty rate of 13%.
- Black residents have proportionally higher rates of poverty than other racial and ethnic minorities compared to their respective shares of the City's total population.
- Black households experienced lower incomes as well as higher rates of poverty than Harrisonburg's White households.
- While Census Tracts 1.01, 1.02, and 4.02 do not meet R/ECAP threshold limits, these areas continue to have relatively high segregation and integration by race/ethnicity.
- R/ECAP thresholds applied at the block group level reveal additional racially and ethnically concentrated areas of poverty within Census Tracts 2.07 (BG 1) and 3.02 (BG 3).
- Overall, Harrisonburg continues to have low levels of segregation, though there is a continuing trend toward increased segregation across racial and ethnic minority groups.

- Harrisonburg's foreign-born population continues to grow, comprising just over 17% of the total population in 2019.
- In the Harrisonburg, Spanish or Spanish Creole is the language most often spoken by persons with LEP, comprising 7.16% of the population.
- Harrisonburg has a lower prevalence rate of persons with disabilities than Virginia, with approximately 9.2% of the population reporting one or more disabilities compared to 11.8% at the state level.
- Cognitive difficulty was the most common type of disability among City residents aged 18-64, and ambulatory difficulty was the most frequently reported type of disability among the elderly aged 65 and over.
- There are significant differences in labor force participation rates among persons with and without a disability.
- In Harrisonburg, the median earnings among persons with disabilities was equivalent to 33.9% of the median earnings of persons without disabilities. Persons with disabilities are more likely to live in poverty than persons without disabilities.
- Harrisonburg's proportion of family households with children increased for the first time since 2000.
- Female-headed households with children are nearly four times more likely to live in poverty than married couples with children.

Population Trends

Harrisonburg experienced consistent population growth between 2000 and 2019, though its rate of growth slowed in the last nine years to less than half of the growth rate experienced in 2000-2010.

The majority of Harrisonburg’s population growth occurred between 2000 and 2010 with a growth rate of just under 21%, more than double that of 2010-2019. This pattern was also present at the state level, which experienced a slower rate of increasing population than the City as a whole in 2000-2010 (13.0% in Virginia compared to 20.9%) and declining to a rate of 5.7% in 2010-2019.

Table 1: Change in Population, 2000-2019

	Total Population, 2000-2019			Change in Total Population	
	2000	2010	2019	% Change 2000-2010	% Change 2010-2019
Virginia	7,078,515	8,001,024	8,454,463	13.0%	5.7%
Harrisonburg	40,468	48,914	53,273	20.9%	8.9%

Source: U.S. Census Bureau, Decennial Census (2000 and 2010, SF1 P001); 2019 ACS 5 Year Estimates (DP05)

The population of Harrisonburg grew by nearly 4,400 residents between 2010 and 2019, an increase of nearly 9%. Despite the City’s overall growth, changes in population varied widely at the block group level. Four of the City’s block groups accounted for over 79% of growth during this period: Census Tract 1.01, BG 1; Census Tract 1.02, BG 2; Census Tract 2.04, BG 3; and Census Tract 2.05, BG 1. In contrast, Census Tracts 1.01, BG 3; 3.02, BG 3; and 4.02, BG 2 experienced population declines greater than 30%.¹

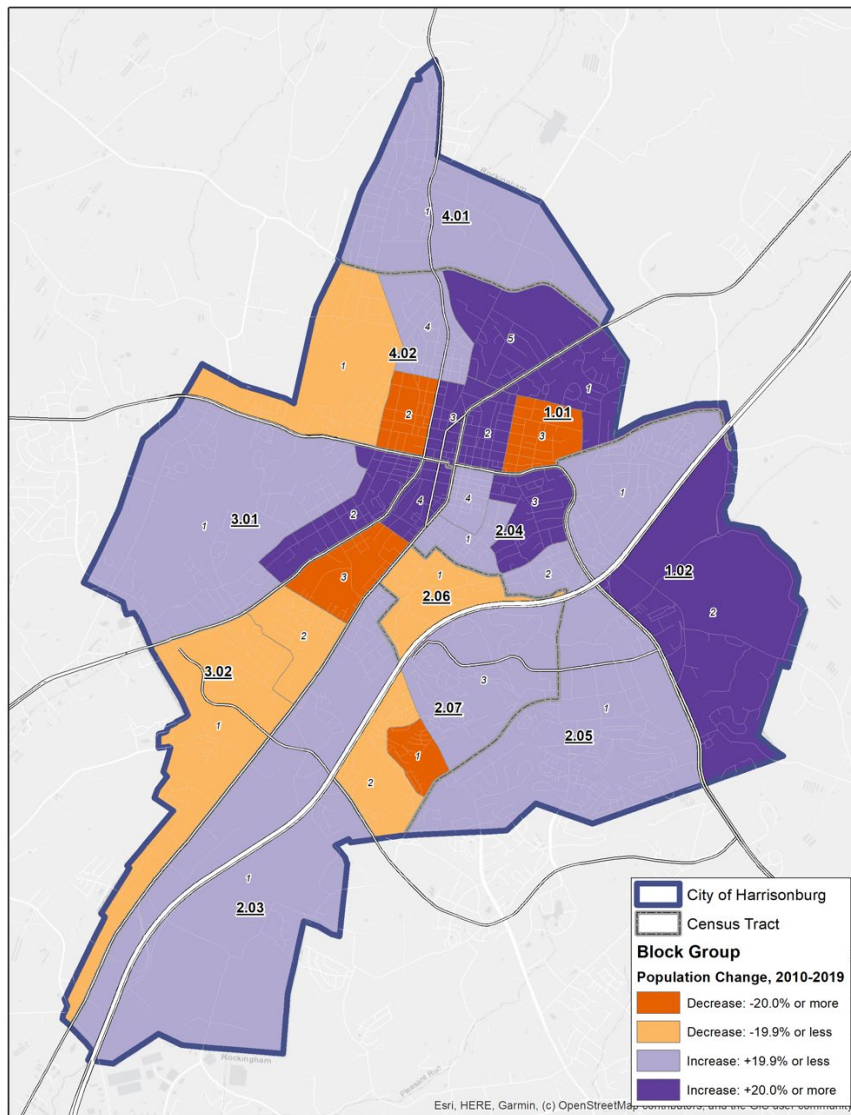
¹ Due to changes in the geographic area of block groups between 2000 and 2010, a direct comparison of population changes prior to 2010 is not possible.

Table 2: Change in Population by Block Group, 2010-2019

	2010	2019	% Change 2010-2019
Census Tract 1.01	4,345	5,356	23.3%
Block Group 1, Census Tract 1.01	2,462	3,691	49.9%
Block Group 2, Census Tract 1.01	644	824	28.0%
Block Group 3, Census Tract 1.01	1,239	841	-32.1%
Census Tract 1.02	4,671	5,843	25.1%
Block Group 1, Census Tract 1.02	3,818	4,339	13.6%
Block Group 2, Census Tract 1.02	853	1,504	76.3%
Census Tract 2.03	1,696	1,937	14.2%
Block Group 1, Census Tract 2.03	1,696	1,937	14.2%
Census Tract 2.04	3,542	4,398	24.2%
Block Group 1, Census Tract 2.04	740	805	8.8%
Block Group 2, Census Tract 2.04	1,180	1,211	2.6%
Block Group 3, Census Tract 2.04	824	1,482	79.9%
Block Group 4, Census Tract 2.04	798	900	12.8%
Census Tract 2.05	5,087	6,039	18.7%
Block Group 1, Census Tract 2.05	5,087	6,039	18.7%
Census Tract 2.06	4,699	4,688	-0.2%
Block Group 1, Census Tract 2.06	4,699	4,688	-0.2%
Census Tract 2.07	6,931	6,394	-7.7%
Block Group 1, Census Tract 2.07	1,655	1,286	-22.3%
Block Group 2, Census Tract 2.07	2,078	1,891	-9.0%
Block Group 3, Census Tract 2.07	3,198	3,217	0.6%
Census Tract 3.01	3,124	3,627	16.1%
Block Group 1, Census Tract 3.01	1,931	2,070	7.2%
Block Group 2, Census Tract 3.01	1,193	1,557	30.5%
Census Tract 3.02	5,898	5,670	-3.9%
Block Group 1, Census Tract 3.02	2,165	1,921	-11.3%
Block Group 2, Census Tract 3.02	1,405	1,367	-2.7%
Block Group 3, Census Tract 3.02	1,356	936	-31.0%
Block Group 4, Census Tract 3.02	972	1,446	48.8%
Census Tract 4.01	3,106	3,418	10.0%
Block Group 1, Census Tract 4.01	3,106	3,418	10.0%
Census Tract 4.02	5,815	5,903	1.5%
Block Group 1, Census Tract 4.02	2,013	1,785	-11.3%
Block Group 2, Census Tract 4.02	983	655	-33.4%
Block Group 3, Census Tract 4.02	790	1,074	35.9%
Block Group 4, Census Tract 4.02	1,216	1,266	4.1%
Block Group 5, Census Tract 4.02	813	1,123	38.1%
City of Harrisonburg	48,914	53,273	8.9%

Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5 Year Estimates (B01003)

Map 1: Population Change, 2010-2019



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5 Year Estimates (B01003)

Students and seniors (aged 65+) are the major drivers of Harrisonburg’s population growth.

According to Harrisonburg’s 2021 Comprehensive Housing Assessment and Market Study, the City’s population growth through 2018 has largely been fueled by students and adults 65 years and older. Between 2010-2018, increased student enrollments James Madison University and Eastern Mennonite University accounted for 2,224 additional residents, representing 37% of overall population growth.

During that time, the population of adults 65 years and older increased from 3,887 to 4,700, representing 13% of overall population growth.²

² City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

Race and Ethnicity

Harrisonburg continued to be less racially diverse but more ethnically diverse than the state as whole. Non-white racial minority residents comprised 32.4% of Virginia’s population in 2019 compared to 19.5% in the City. However, Harrisonburg is more ethnically diverse than the state by a large margin. The proportion of residents of Hispanic ethnicity in Harrisonburg (19.7%) is more than double that of the state (9.4%).

Table 3: Racial Diversity, 2010-2019

	2010		2019		Percent Change in Population
	Number	Percentage	Number	Percentage	
Virginia	8,001,024	100.0%	8,454,463	100.0%	5.7%
White	5,486,852	68.6%	5,717,617	67.6%	4.2%
Non-White	2,514,172	31.4%	2,736,846	32.4%	8.9%
Black	1,551,399	19.4%	1,621,592	19.2%	4.5%
Asian	439,890	5.5%	541,133	6.4%	23.0%
American Indian/Alaska Native	29,225	0.4%	23,873	0.3%	-18.3%
Other (including multiracial)*	493,658	6.2%	550,248	6.5%	11.5%
Hispanic**	631,825	7.9%	792,001	9.4%	25.4%
City of Harrisonburg	48,914	100.0%	53,273	100.0%	8.9%
White	38,371	78.4%	42,838	80.4%	11.6%
Non-White	10,543	21.6%	10,435	19.6%	-1.0%
Black	3,112	6.4%	3,946	7.4%	26.8%
Asian	1,718	3.5%	2,073	3.9%	20.7%
American Indian/Alaska Native	127	0.3%	76	0.1%	-40.2%
Other (including multiracial)*	5,586	11.4%	4,340	8.1%	-22.3%
Hispanic**	7,665	15.7%	10,518	19.7%	37.2%

* 'Other' includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races.

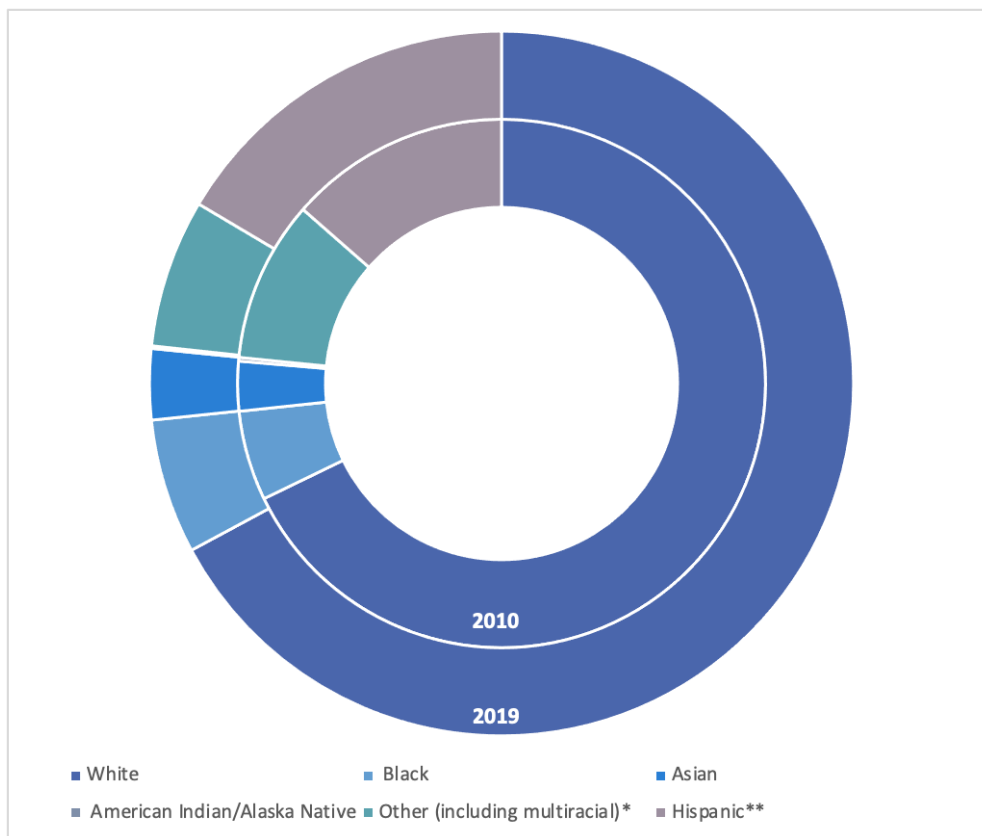
**Hispanic ethnicity is counted independently of race by the U.S. Census Bureau. Percentages for the race categories

Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P003, P004); 2019 ACS 5-Year Estimates (DP05)

Racial diversity in Harrisonburg declined slightly between 2010 and 2019, while ethnic diversity increased as a result of an expanding Hispanic population.

Despite high rates of growth in Black and Asian populations of 26.8% and 20.7%, respectively, the City of Harrisonburg has become slightly less racially diverse. Non-White residents declined from 21.6% of the total population in 2010 to 19.6% in 2019. Lower racial diversity is largely attributable to population losses within the largest racial minority group, 'Other' races, as well as growth in the White population. Meanwhile, the Hispanic population grew by just over 37% during this period, increasing Harrisonburg's ethnic diversity from 15.7% to 19.7% of the total population in 2019. Consistent with the 2016 AFH, Harrisonburg has continued to diversify overall as the Hispanic population expands.

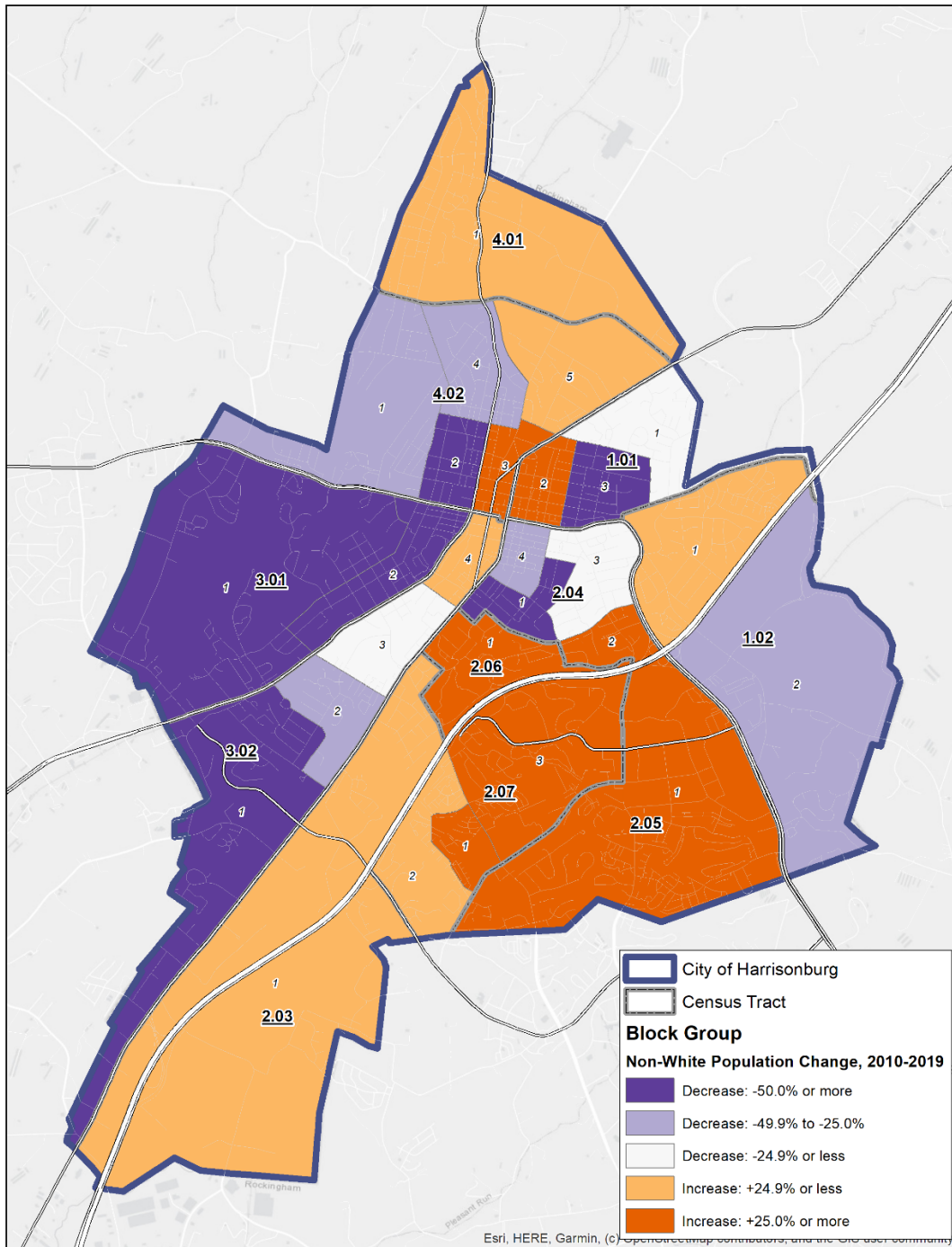
Figure 1: Racial Diversity in Harrisonburg, 2010-2019



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5 Year Estimates (DP05)

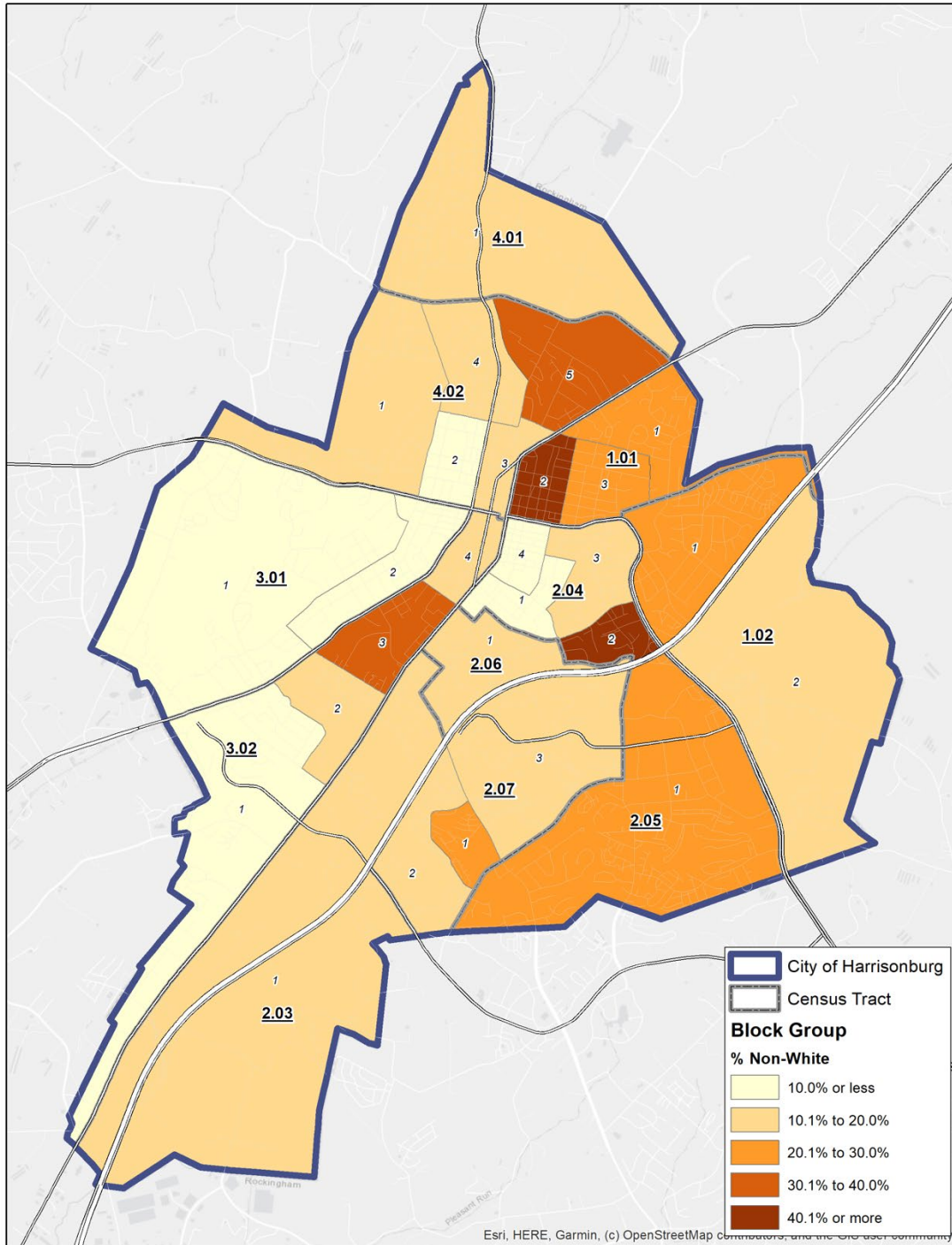
In general, northwest Harrisonburg experienced the greatest population declines in non-White racial minorities between 2010 and 2019. Census Tracts 3.01, 3.02, 4.02, 1.01, and 2.04 each contain block groups in which the minority population decreased by more than a 50%. Increases in racial minority populations tended to occur in the north, central, and southeast portions of Harrisonburg, with the highest growth occurring in Census Tracts 2.05, 2.06, and 2.07.

Map 2: Change in Non-White Racial Minorities, 2010-2019



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5-Year Estimates (B02001)
 As in the 2016 AFH, there are geographic patterns by race; non-White persons tend to reside in the northeastern portion of the City with highest concentrations in Census Tracts 1.01 (BG 2), and 2.04 (BG 2).

Map 3: Non-White Racial Minorities, 2019

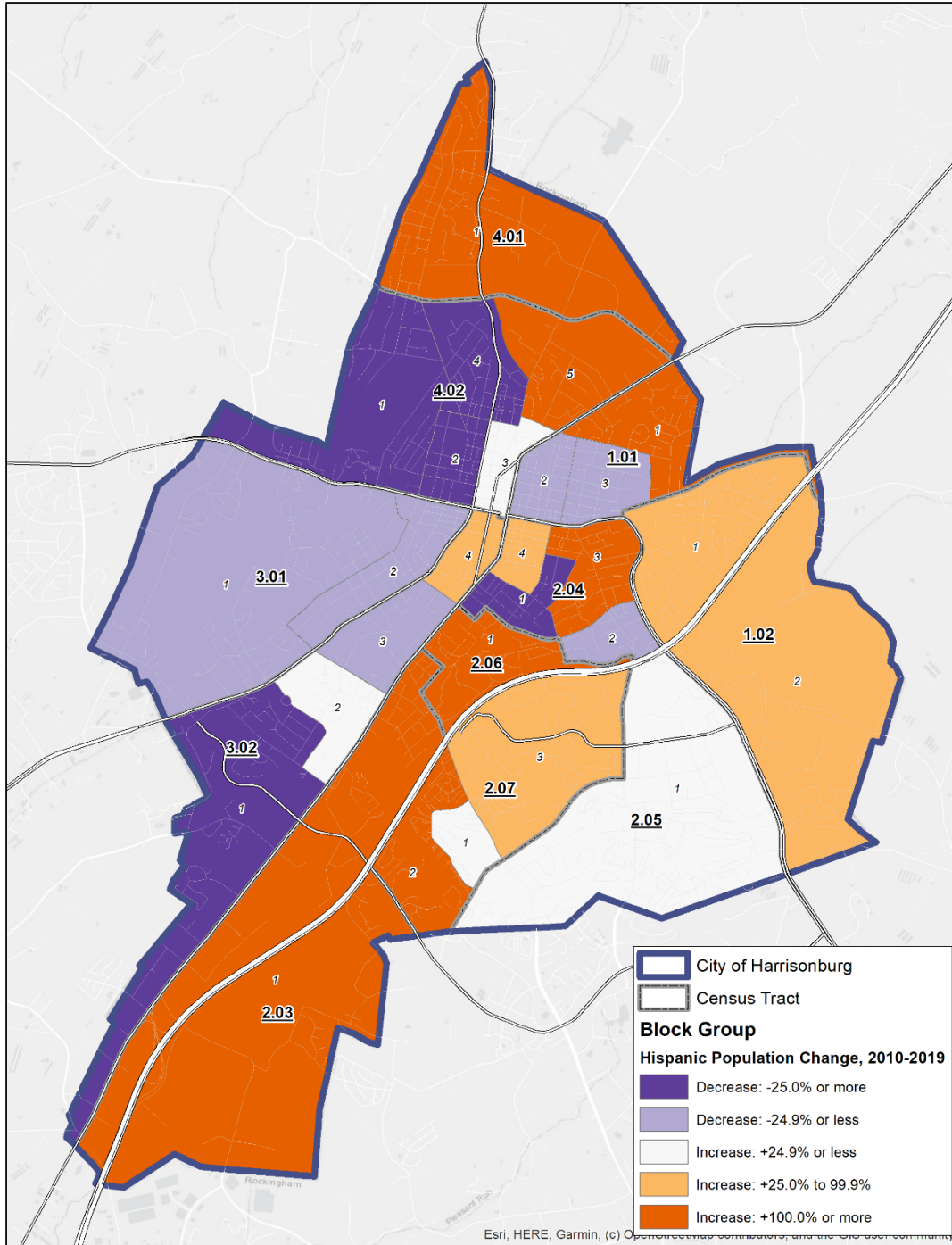


Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B02001)

As with declines in racial minority populations, the northwestern area of the City also tended to experience Hispanic population losses. The greatest increases in Hispanic populations occurred in

central Harrisonburg. Beginning with Census Tract 4.01 (BG1) in the north, through Census Tracts 2.04 (BG 3) and 2.06 (BG 1) toward the City center, and ending with Census Tract 2.03 (BG 1-2) in the south, Hispanic populations in these areas grew by more than 100%.

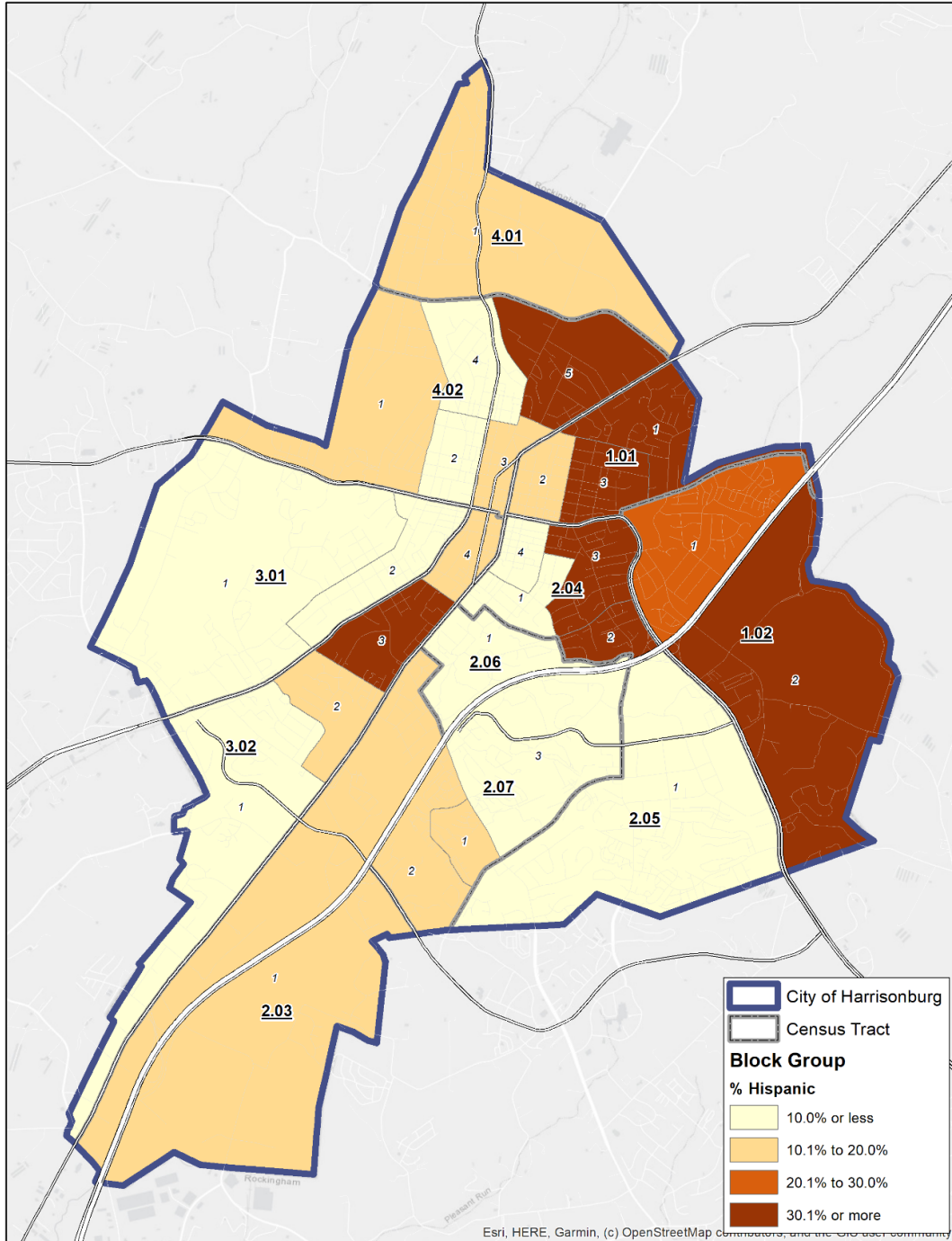
Map 4: Change in Ethnic Minorities (Hispanic), 2010-2019



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5-Year Estimates (B03002)

Consistent with the 2016 AFH, Hispanic persons tend to reside in the northeastern portion of Harrisonburg. Persons of Hispanic ethnicity are more concentrated in Census Tracts 4.02 (BG 5), 1.02 (BG 1,3) 2.04 (BG 3), and 2.06 (BG 2).

Map 5: Ethnic Minorities (Hispanic), 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B03002) Income, Unemployment, and Poverty

Employment greatly influences an individual’s income, poverty status, and housing choice. The United Way ALICE framework provides an estimate for the costs that families face to meet basic necessities like housing, transportation, food, health care, childcare, and a basic smartphone plan. ALICE workers—who are Asset Limited, Income Constrained, Employed—earn more than the poverty level but less than a basic cost of living and are employed across industries such as construction, education, service, and caretaking. As of 2018, the United Way estimates that the ALICE income threshold to meet basic expenses for a family of two adults and two children in Harrisonburg is \$60,000. Households earning the median household income level of \$43,893 in the city do not earn enough to meet the ALICE threshold. Even after removing the youngest householders assuming they are student households, the United Way estimates that 55% of Harrisonburg households headed by a householder aged 25 and older, totaling 7,834 households, do not meet the \$60,000 earnings threshold of a survival budget for a family of four.

The threshold of \$40,000 per year in earnings serves as a proxy for good-paying jobs. Workers in industries with average wages above \$40,000 per year are more likely to earn good wages and receive healthcare benefits with their jobs. Good-paying jobs bring stability to communities and allow workers to cover basic expenses related to housing, transportation, food, and other necessities.³

Although employment grew in 2010-2019, the number of jobs in industries with average wages above \$40,000 per year decreased and wages are largely stagnant.

According to the 2021 Comprehensive Housing Assessment and Market Study, Harrisonburg added more than 600 jobs between 2010 and 2019. Yet, the bulk of this growth occurred in low-wage industries and was paired with employment losses in high-wage industries. Because most job growth is occurring within low-wage industries, Harrisonburg will need additional affordable housing to meet the needs of future workers. However, as income decreases, development of new affordable units becomes more expensive due to the deep subsidy required to create housing that is affordable at the lowest income tiers.⁴

Despite overall declining unemployment rates across demographic groups between 2010 and 2019, Black residents continued to experience above-average rates of unemployment.

Lower earnings due to unemployment and income disparities limit a household’s ability to afford housing. The American Community Survey (ACS) provides detailed employment data by race, indicating differences in employment rates among demographic groups. In general, unemployment rates decreased across racial and ethnic groups between 2010 and 2019. However, Black residents continued to experience above-average rates of unemployment during this period. Black residents had a rate of

³ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

⁴ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

11.0% unemployment in 2010-2014, falling to 6.4% in 2015-2019, yet remained higher than the City-wide unemployment rate of 4.9%.

In contrast, unemployment among Harrisonburg's Asian labor force declined from 15.4% in 2014, more than double the unemployment rate City-wide, to 1.7%, approximately 34% lower than the City's 2019 unemployment rate. For Hispanic residents, unemployment remained roughly consistent at 5.0% in 2014 and 4.8% in 2019, which was just below the 4.9% City-wide rate.⁵

In 2019, Harrisonburg's median household income was equivalent to 62.9% of the State median income and 74.3% of the national median income.

Household income is strongly related to housing choice as it is one of several factors used to determine eligibility for a home mortgage loan or rental lease. Additionally, a lack of income inherently reduces the number of options a household has over where to live. Median household income in Harrisonburg increased by just under 10% to \$46,679 in 2019, remaining significantly lower than both the State median of \$74,222 and the national median of \$62,843.⁶

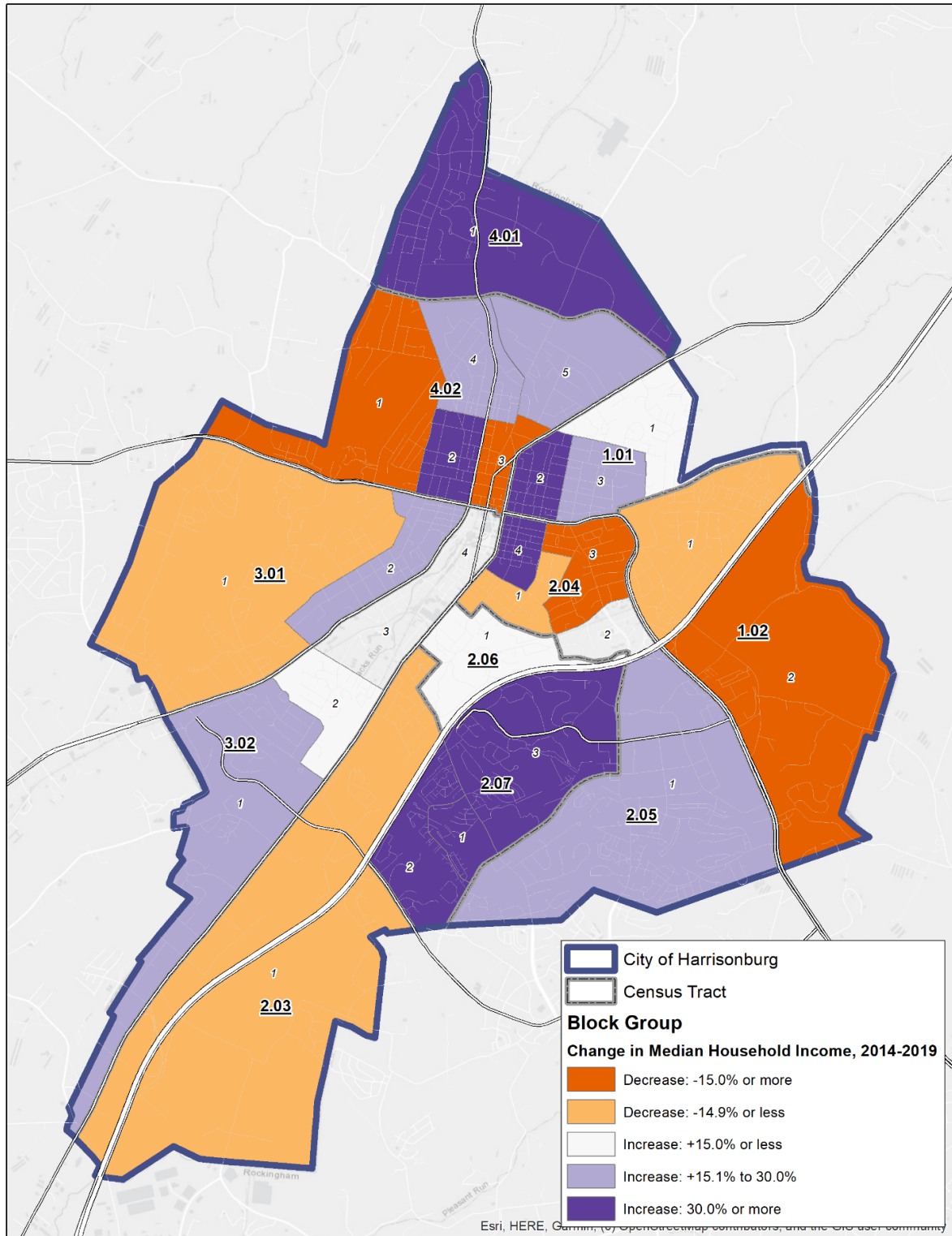
With an increase of over 150% between 2014 and 2019, Census Tract 2.04, Block Group 4, moved from among the lowest median income areas to the fourth highest median household income in Harrisonburg at \$69,205. All Block Groups in Census Tract 2.07 continued to have the lowest median household incomes despite substantial growth, earning less than half of the City-wide median in 2019.⁷

⁵ U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (S2301).

⁶ U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013).

⁷ U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013).

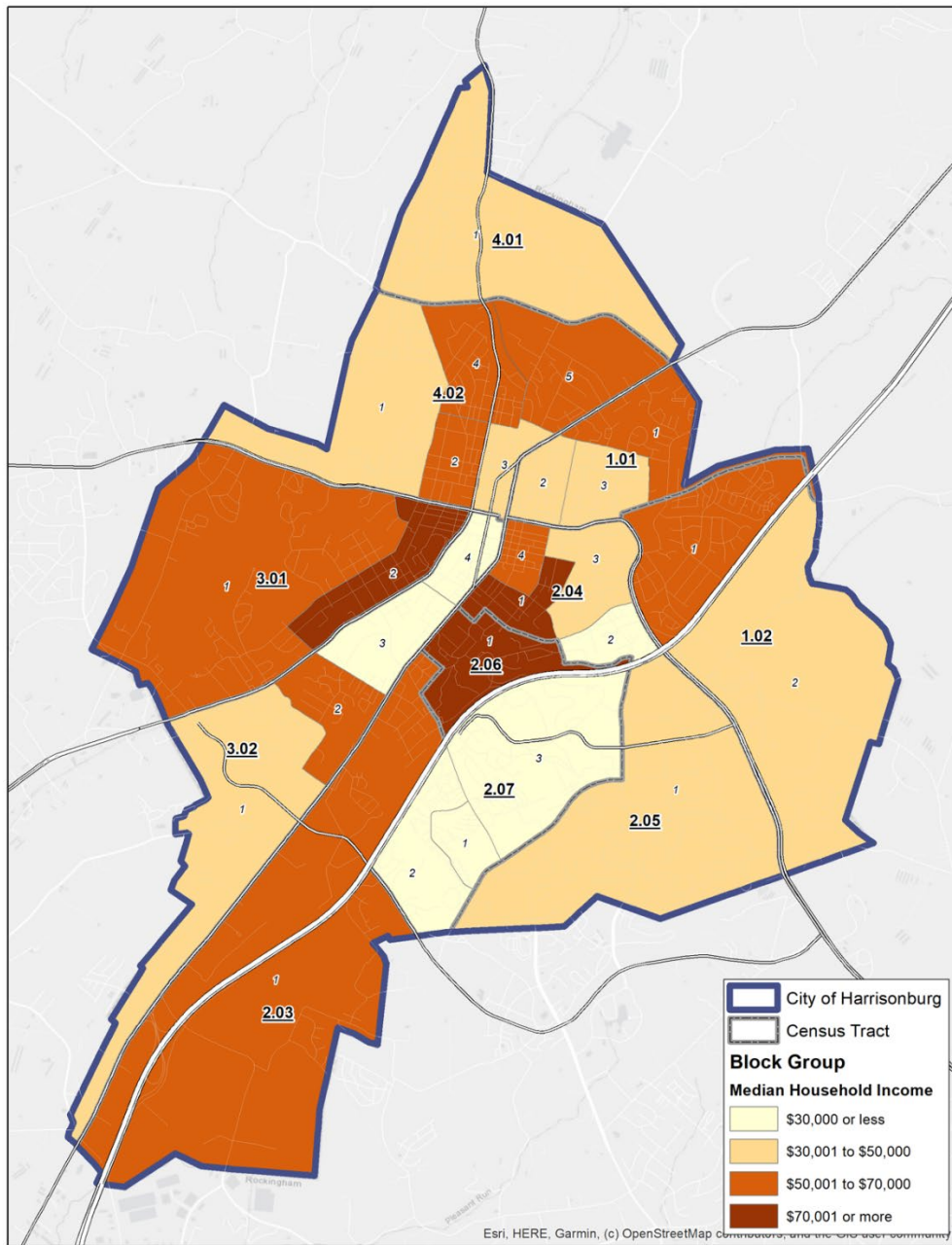
Map 6: Changes in Median Household Income, 2014-2019



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013)

Median household income varies geographically across Harrisonburg. Census Tract 2.06 (BG 1), which is home to the JMU Campus, had the highest median income at \$118,594. Census Tract 2.04 (BG 1) also had a noticeably higher median household income compared to the rest of the City, most likely due to its immediate proximity to JMU. Lower median incomes tended to correspond with block groups along the cross-section of Route 11 and West Market Street in the northern part of the City, and Interstate 81 from roughly East Market Street to Stone Spring Road toward the southeast.

Map 7: Median Household Income, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B19013)

When adjusted for inflation, changes in real household income have varied by race/ethnicity.

Between 2010 and 2019, median household incomes increased across all racial groups, but declined for Hispanic households. The highest rate of income growth occurred among Asian households, whose median income doubled from 2010 to 2019. In 2019, Asians are the only racial or ethnic group to earn a median household income higher than the City-wide median. Despite growth of 12.2%, the median income for Black households in 2019 (\$40,000) remained below the City median of \$46,679. In contrast, median income among Hispanic households declined by 8.2% during this time. The \$45,090 median income of Hispanic households in 2010 was slightly higher than the City-wide median of \$44,222. However, by 2019, the median income earned by Hispanic households fell to \$41,410, nearly 13% below the City median.

Table 4: Median Household Income by Race/Ethnicity (2019 dollars)

	2010-2014	2010-2014 Inflation Adjusted, 2019 \$	2015-2019	Percent Change 2010-2019
City of Harrisonburg	\$ 37,235	\$ 44,222	\$ 46,679	5.6%
White	\$ 37,720	\$ 44,798	\$ 46,322	3.4%
Black	\$ 30,026	\$ 35,660	\$ 40,000	12.2%
Asian	\$ 22,188	\$ 26,351	\$ 52,837	100.5%
Hispanic	\$ 37,966	\$ 45,090	\$ 41,410	-8.2%
Virginia	\$ 61,406	\$ 72,928	\$ 74,222	1.8%
White	\$ 66,357	\$ 78,808	\$ 79,578	1.0%
Black	\$ 42,468	\$ 50,437	\$ 51,654	2.4%
Asian	\$ 83,569	\$ 99,250	\$ 105,931	6.7%
Hispanic	\$ 57,793	\$ 68,637	\$ 68,772	0.2%

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013, B19013A, B19013B, B19013D, B19013I)

The poverty rate skews higher in the City due to the college student population. Harrisonburg's poverty rate was just over 28% in 2019. However, removing the college-age households of 19-24 years old from the equation lowers the poverty rate to 14%, higher than the State rate of 10.6% but comparable to the national poverty rate of 13%.

Poverty is also strongly related to limited housing choice and disproportionately affects members of the protected classes. The federal poverty level in 2019 was defined as an annual income of \$25,750 for a family of four or \$12,490 for an individual.⁸ The overall poverty rate in Harrisonburg in 2019 was 28.3%.⁹ This rate was more than double the Virginia average of 10.6%.

As noted in Harrisonburg's 2021 Comprehensive Housing Assessment and Market Study, the City's poverty rate skews higher due to the large number of college students. When the Census compiles the traditional poverty rate, it counts individuals with incomes that are lower than the poverty rate, including students not living in dorms. Because of this data collection method, many college students living off-campus are counted as impoverished, even if they may be supported by their parents or student loans. If the college student population is removed from the calculations, then the poverty rate of non-college student community members in Harrisonburg is 14%.¹⁰ The City's above-average poverty rate correlates with the below-average median incomes discussed earlier in this section.¹¹

⁸ U.S. Department of Health and Human Services (DHHS), Office of the Assistant Secretary for Planning and Evaluation. 2019 Poverty Guidelines. Accessed at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2019-poverty-guidelines>

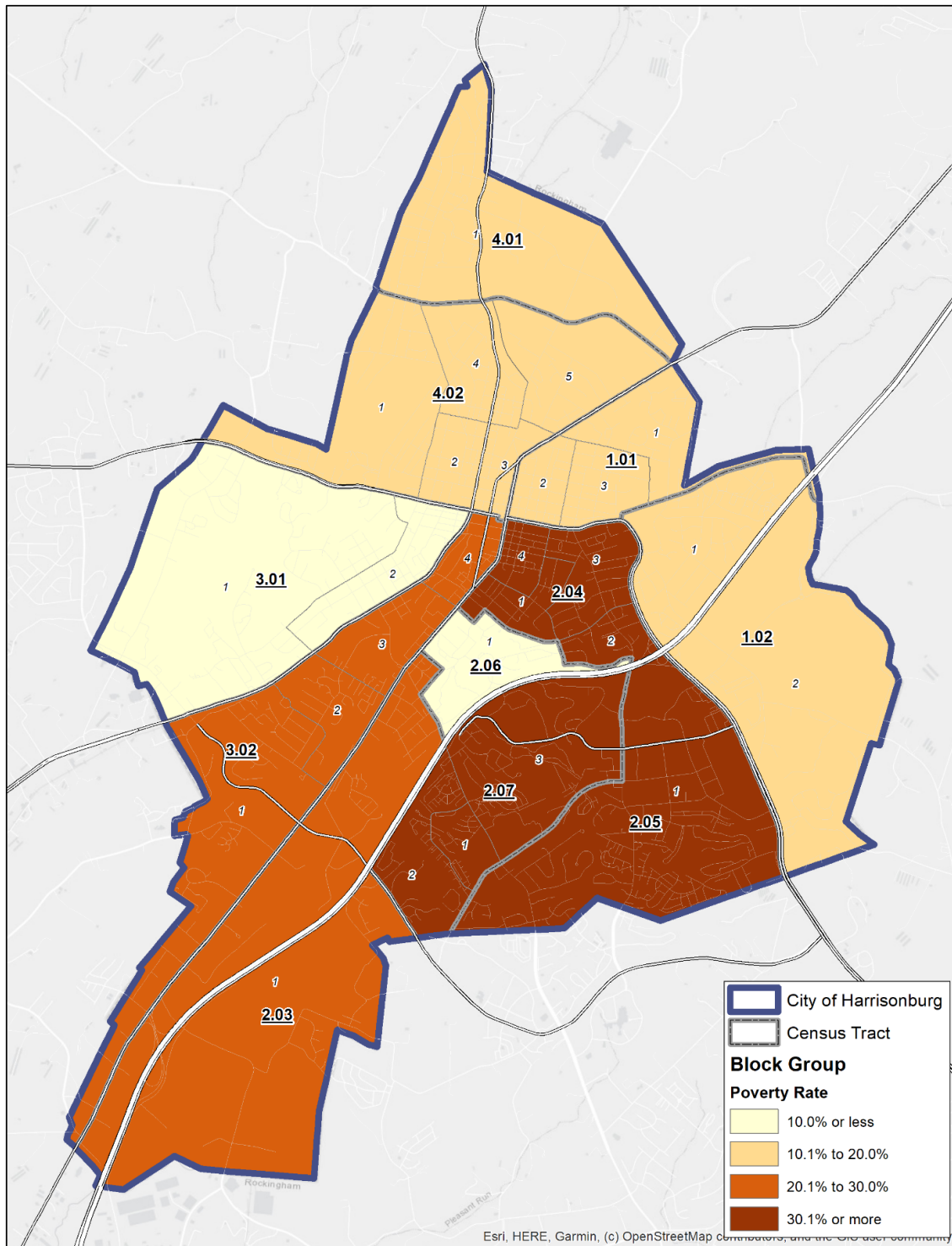
⁹ Federal poverty guideline figures are not the figures utilized by the Census Bureau to calculate official poverty population figures. The guidelines are a simplification of the poverty thresholds for administrative purposes, such as determining financial eligibility for certain federal programs. The Census Bureau utilizes poverty thresholds, a slightly different version of the federal poverty measure used for statistical purposes.

¹⁰ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

Note that the adjusted poverty rate for non-college student community members is for 2018.

¹¹ U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001).

Map 8: Poverty Rate, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001)

Black residents have proportionally higher rates of poverty than other racial and ethnic minorities compared to their respective shares of the City's total population. There were significant differences in income and poverty rate by race and ethnicity. White residents had median incomes and poverty rates that were roughly equivalent to City-wide levels. The MHI of White residents was \$46,322 with a poverty rate of 28.7% that was slightly higher than the City-wide rate.

Black households experience disproportionately higher rates of poverty when compared to their respective share of the total population. Black residents comprise 7.5% of the population for whom poverty status is determined, while accounting for 8.8% of the population in poverty. Hispanic residents account for 17.8% of the City's population in poverty yet comprise approximately 21.9% of the total population for whom poverty status was determined.

Table 5: Total Population in Poverty by Race/Ethnicity, 2019

	Total Population for whom Poverty Status is Determined*		Population in Poverty	
	Number	Percent of Population	Number	Percent of Population in Poverty
City of Harrisonburg	46,008	100.0%	13,025	28.3%
White	37,014	80.5%	10,619	81.5%
Non-White	8,994	19.5%	2,406	18.5%
Black	3,469	7.5%	1,147	8.8%
Asian	1,535	3.3%	466	3.6%
Other (including multiracial)**	3,990	8.7%	793	6.1%
Hispanic***	10,075	21.9%	2,312	17.8%
Virginia	8,201,608	100.0%	865,691	10.6%
White	5,565,618	67.9%	475,794	55.0%
Non-White	2,635,990	32.1%	389,897	45.0%
Black	1,548,219	18.9%	272,438	31.5%
Asian	531,604	6.5%	38,844	4.5%
American Indian/Alaska Native	22,691	0.3%	2,942	0.3%
Other (including multiracial)**	533,476	6.5%	75,673	8.7%
Hispanic***	768,481	9.4%	107,325	12.4%

* Total population data pertains only to those for whom poverty status was determined; therefore totals may not correspond to population totals in other tables.

** 'Other' includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races. American Indian/Alaskan Native have also been included in this category for Harrisonburg due to the extremely small sample size (<100).

*** Hispanic ethnicity is counted independently of race by the U.S. Census Bureau. Percentages for the race categories should not be combined with the percent Hispanic. Similarly, the population totals for each geography equal the sum of all race categories, excluding Hispanic ethnicity.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001, B17001A, B17001B, B17001D, B17001I)

Black households experienced lower incomes as well as higher rates of poverty than Harrisonburg’s White households.

Median household income among Black households was \$40,000 in 2019, lower than the City MHI of \$46,679. The median Black household in Harrisonburg earned \$6,322 less than the median White household. Just under 29% of White households were living in poverty in 2019 compared to 33.1% of Black households. This reflects continued economic segregation in Harrisonburg.¹²

Table 6: Poverty Rate by Race/Ethnicity, 2019

	Median Household Income	Poverty Rate
City of Harrisonburg	\$ 46,679	28.3%
White	\$ 46,322	28.7%
Black	\$ 40,000	33.1%
Asian	\$ 52,837	30.4%
Hispanic	\$ 41,410	22.9%
Virginia	\$ 74,222	10.6%
White	\$ 79,578	8.5%
Black	\$ 51,654	17.6%
Asian	\$ 105,931	7.3%
Hispanic	\$ 68,772	14.0%

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001, B17001A, B17001B, B17001D, B17001I)

¹² U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001, B17001A, B17001B, B17001D, B17001I, B19013, B19013A, B19013B, B19013D, B19013I).

Racially/Ethnically Concentrated Areas of Poverty

HUD defines R/ECAPs as census tracts with a non-White population of at least 50% and a poverty rate that either exceeds 40% or is three times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. By combining these data, it is possible to determine geographic patterns where there are concentrated areas of poverty among racial/ethnic minorities. Although ethnicity and race as defined by the US Census Bureau are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations. These are referred to collectively as "racially/ethnically concentrated areas of poverty" or R/ECAPs.

The selected R/ECAP thresholds in the 2016 AFH included a non-White population higher than 15% and poverty rate greater than 33% (the City-wide rate at that time). However, it is important to look at disparities between groups in relation to disproportionate poverty and access to community assets to assess fair housing needs. Therefore, in the current analysis, local criteria have been adjusted; the thresholds for R/ECAPs in this analysis were set at *20% or higher non-White or Hispanic populations and a poverty rate greater than the City-wide average of 28.3%*. R/ECAP thresholds were applied at both the census tract and block group levels to allow for comparison with both the 2016 AFH and the 2021 Comprehensive Housing Assessment and Market Study.

While Census Tracts 1.01, 1.02, and 4.02 were identified as R/CAPs in the 2016 AFH, these areas no longer meet the eligibility threshold. However, they continue to have higher levels of poverty and/or racial/ethnic concentrations.

Consistent with the 2016 AFH, Census Tract 1.01 continues to be an area of concentration for both racial and ethnic minorities; however, this census tract does not meet the R/ECAP thresholds based on 2019 data due to a poverty rate of 17.6%, well below the City-wide rate. Census Tracts 1.02 and 4.02 also continue to have racial and/or ethnic minority concentrations, but do not exceed the City-wide poverty rate to qualify as R/ECAPs.

Two additional census tracts were identified as having concentrations of both racial and/or ethnic minorities and households below the poverty line based on 2019 data. The first R/ECAP was Census Tract 2.04, which had a non-White concentration of 25.7%, an Hispanic concentration of 28.6%, and a 35.7% poverty rate. This tract was the only R/ECAP identified in the 2016 AFH, described as containing some of the most densely populated and segregated neighborhoods in Harrisonburg, corresponding to Downtown, Old Town, and the Reservoir area. Within Census Tract 2.04, 2 of the 4 block groups met R/ECAP thresholds. A new, second R/ECAP in 2019 was Census Tract 2.05 (Block Group 1); the racial minority concentration in this area was 20.8% with a 37.2% poverty rate.

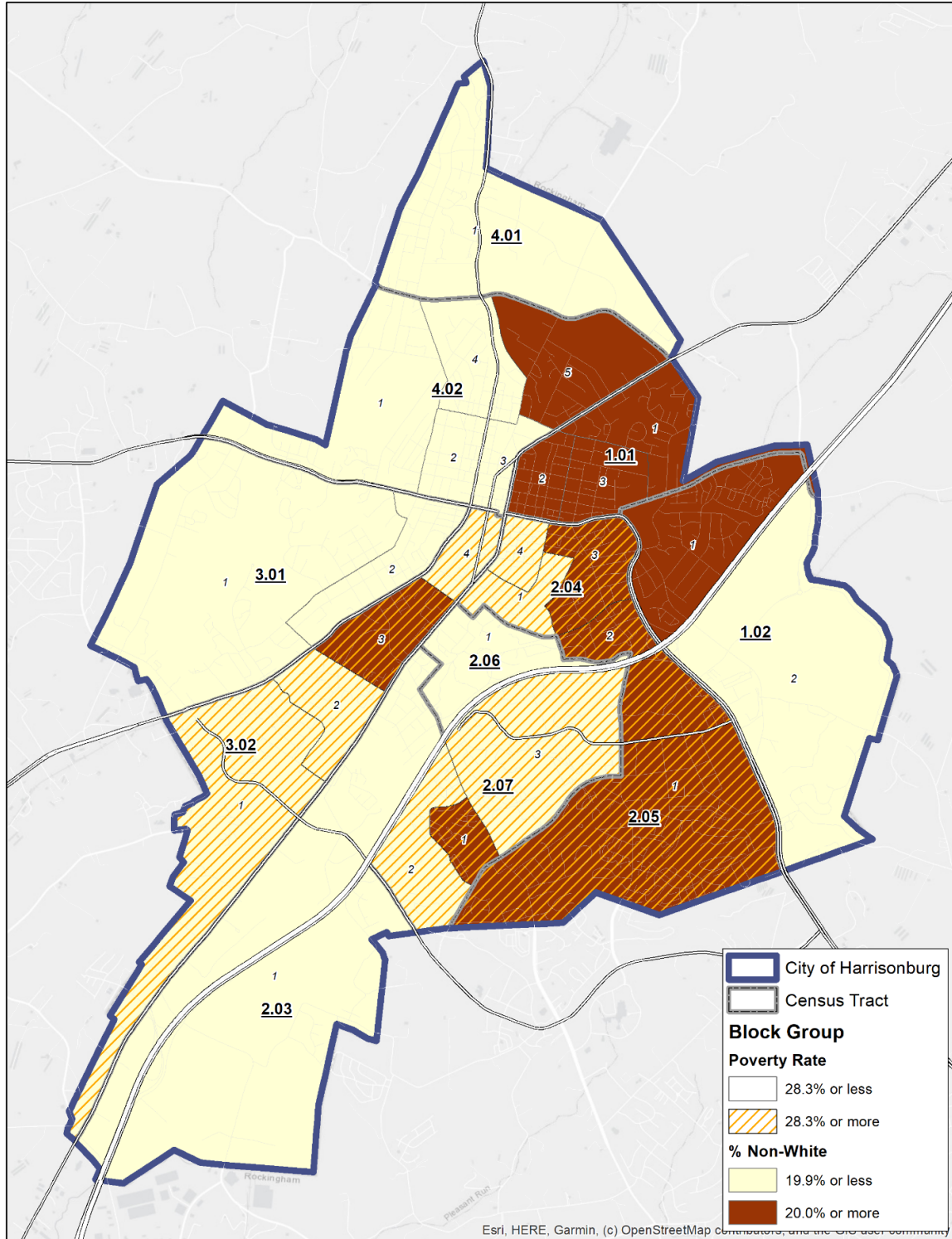
R/ECAP thresholds applied at the block group level reveal additional racially and ethnically concentrated areas of poverty within Census Tracts 2.07 (BG 1) and 3.02 (BG 3).

Table 7: Racial and Ethnic Concentrations by Census Tract and Block Group, 2019

	% Racial Concentration	% Ethnic (Hispanic) Concentration	% Poverty Concentration
Census Tract 1.01	29.6%	42.9%	17.6%
Block Group 1, Census Tract 1.01	23.8%	49.6%	17.6%
Block Group 2, Census Tract 1.01	57.3%	17.1%	17.6%
Block Group 3, Census Tract 1.01	28.3%	38.6%	17.6%
Census Tract 1.02	24.9%	32.4%	20.4%
Block Group 1, Census Tract 1.02	28.9%	26.1%	20.4%
Block Group 2, Census Tract 1.02	13.2%	50.5%	20.4%
Census Tract 2.03	11.4%	11.9%	21.6%
Block Group 1, Census Tract 2.03	11.4%	11.9%	21.6%
Census Tract 2.04	25.7%	28.6%	35.7%
Block Group 1, Census Tract 2.04	0.9%	1.1%	35.7%
Block Group 2, Census Tract 2.04	64.6%	31.5%	35.7%
Block Group 3, Census Tract 2.04	19.8%	53.1%	35.7%
Block Group 4, Census Tract 2.04	5.3%	8.9%	35.7%
Census Tract 2.05	20.8%	9.8%	37.2%
Block Group 1, Census Tract 2.05	20.8%	9.8%	37.2%
Census Tract 2.06	17.7%	6.5%	0.0%
Block Group 1, Census Tract 2.06	17.7%	6.5%	0.0%
Census Tract 2.07	19.1%	9.8%	72.2%
Block Group 1, Census Tract 2.07	29.5%	17.5%	72.2%
Block Group 2, Census Tract 2.07	14.8%	12.2%	72.2%
Block Group 3, Census Tract 2.07	17.6%	5.4%	72.2%
Census Tract 3.01	5.5%	9.2%	7.0%
Block Group 1, Census Tract 3.01	7.5%	9.9%	7.0%
Block Group 2, Census Tract 3.01	2.7%	8.2%	7.0%
Census Tract 3.02	17.6%	18.5%	29.2%
Block Group 1, Census Tract 3.02	10.3%	9.9%	29.2%
Block Group 2, Census Tract 3.02	16.2%	19.4%	29.2%
Block Group 3, Census Tract 3.02	37.6%	46.0%	29.2%
Block Group 4, Census Tract 3.02	15.8%	11.3%	29.2%
Census Tract 4.01	15.1%	17.8%	12.3%
Block Group 1, Census Tract 4.01	15.1%	17.8%	12.3%
Census Tract 4.02	17.3%	22.5%	16.7%
Block Group 1, Census Tract 4.02	15.8%	13.4%	16.7%
Block Group 2, Census Tract 4.02	0.0%	7.6%	16.7%
Block Group 3, Census Tract 4.02	17.3%	14.2%	16.7%
Block Group 4, Census Tract 4.02	13.2%	9.0%	16.7%
Block Group 5, Census Tract 4.02	34.6%	68.7%	16.7%

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP05, B17001A-I)

Map 9: R/ECAPs, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP05, B17001A-I)

Dissimilarity Index

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community may create other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. 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.

Segregation can be measured using a statistical tool called the dissimilarity index.¹³ This index measures the degree of separation between racial or ethnic groups living in a community. Since White residents are the majority in Harrisonburg, all other racial and ethnic groups were compared to the White population as a baseline. Dissimilarity index scores were determined for Black, Asian, 'Other' races, and Hispanic populations using census tracts. The index of dissimilarity allows for comparisons between subpopulations (i.e., different races/ethnicities), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity 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. According to HUD, a score under 40 is considered low, between 40 and 59 is moderate, and above 60 is high segregation.

¹³ For a given geographic area, the index is equal to $DI = \frac{1}{2} \sum_i^N \left| \frac{a_i}{A} - \frac{b_i}{B} \right|$, where a_i is the group population of a sub-region (i.e. census tract), A is the group population in the whole region, b_i is the comparison group population in a sub-region, and B is the comparison group's population in the whole region.

Overall, Harrisonburg continues to have low levels of segregation, though there is a continuing trend toward increased segregation across racial and ethnic minority groups.

In 2010, Harrisonburg had low levels of segregation among all racial/ethnic groups with populations greater than 1,000. Segregation increased across all racial and ethnic minorities between 2010 and 2019 with the largest change occurring among Asian residents, increasing from a Dissimilarity Index Score of 14.9% in 2010 to 30.7% by 2019. Black/White segregation increased by nearly 19% during this time.¹⁴

Table 8: Dissimilarity Index, 2010-2019

	2010	2019	Percent Change
Black/African American	25.1	29.8	18.7%
Asian	14.9	30.7	106.0%
Other (incl. Multiracial)*	34.5	37.0	7.2%
Hispanic**	35.8	36.5	2.0%
* 'Other' includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races.			
**Hispanic ethnicity is counted independently of race by the U.S. Census Bureau.			

Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5-Year Estimates (B02001)

¹⁴ A direct comparison of the current dissimilarity index and the indices from the 2016 AFH is not possible; the 2016 AFH utilized a tool created by HUD that is no longer available.

Ancestry and National Origin

Harrisonburg's foreign-born population continues to grow, comprising just over 17% of the total population in 2019.

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations indicate that there are a total of 9,122 foreign-born persons residing in Harrisonburg, accounting for 17.1% of the total population. This represented an increase from the 2016 AFH, when just under 15% of the population was foreign-born. El Salvador, Mexico, and Honduras continue to be among the top countries of origin for foreign-born City residents.

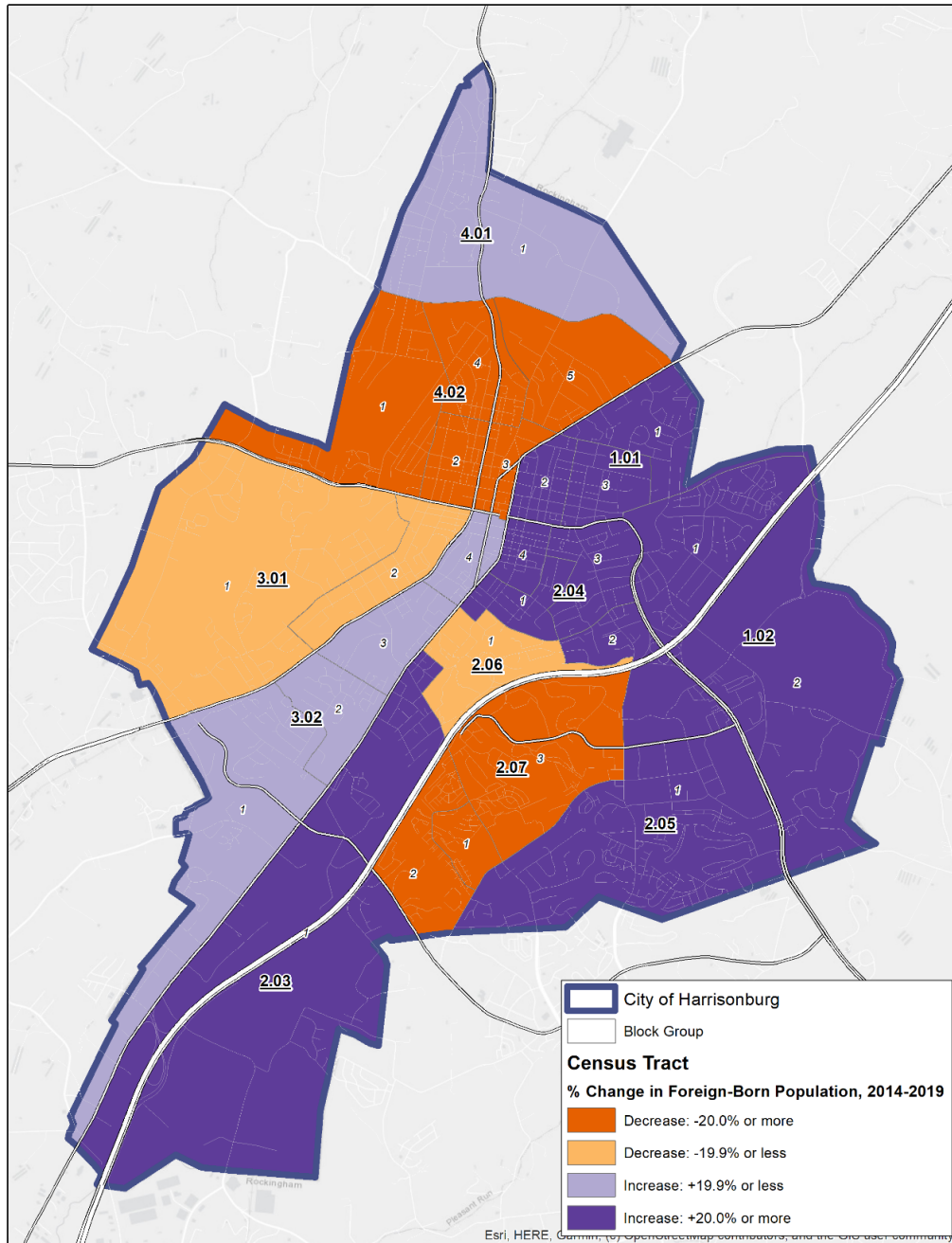
Table 9: Countries of Origin for Foreign-born Residents

Rank	Region/Country of Origin	Population
	Latin America	4,765
1	El Salvador	1,296
2	Mexico	1,232
4	Honduras	750
5	Caribbean	720
6	South America	642
	Asia	2,594
3	Iraq	895
7	China	434
8	Pakistan	285

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B05006)

Consistent with racial minority population changes discussed earlier, the greatest increases in foreign-born population are generally concentrated in the northeast and southeast portions of Harrisonburg. With the exception of Census Tracts 2.06 and 2.07, lesser increases and declines in foreign-born residents tended to occur in the northwest and southwest portions of the City.

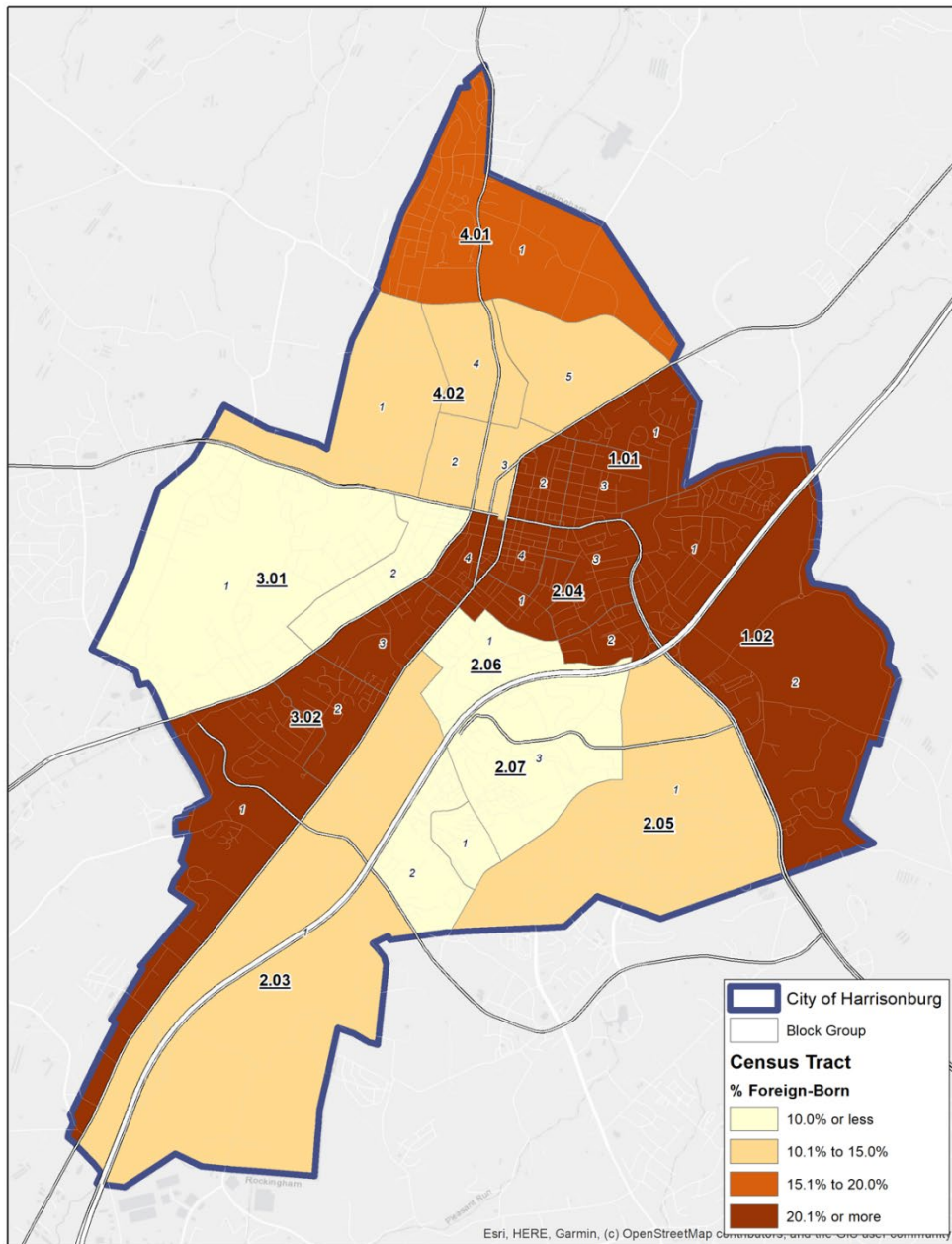
Map 10: Change in Foreign-born Population, 2014-2019



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B05006)

For the most part, geographic patterns in 2019 are consistent with the 2016 AFH with higher concentrations of foreign-born persons residing in Census Tracts 3.02 (All Block Groups), 2.04 (All Block Groups), and 2.06 (BG 2). Census Tracts 1.01 (BG1-3) and 1.02 (BG 1-2) shifted from moderate to highest levels of concentration above 20%, while the foreign-born population has become less concentrated in Census Tract 4.02 (All Block Groups). The highest concentrations of foreign-born residents also correspond to three of the City’s five designated R/ECAPs: Census Tracts 2.04 (BG 2,3) and 3.02 (BG 3).

Map 11: Foreign-born Population, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B05006)

Limited English Proficiency

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. The largest LEP populations are listed in the following table.

Table 10: LEP by Language, 2015

Rank	Language Spoken	Population	
		Number	Percentage of Total Population
1	Spanish or Spanish Creole	3,813	7.16%
2	Russian	412	0.77%
3	Arabic	401	0.75%
4	Chinese	372	0.70%
5	African Languages	313	0.59%

Source: U.S. Census Bureau, 2015 ACS 5-Year Estimates (B16001)

In Harrisonburg, Spanish or Spanish Creole is the foreign language most often spoken by persons with LEP and comprise 7.16% of the population.

Disability

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 engage in 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 disability provided “reasonable accommodation” can be made. This may include changes to address the needs of persons with disabilities, such as adaptive structural changes (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).

Harrisonburg has a lower prevalence rate of persons with disabilities than Virginia with approximately 9.2% of the population reporting one or more disabilities compared to 11.8% at the state level.

Among residents for whom disability status is determined, 9.2% of Harrisonburg’s civilian, non-institutionalized population reported one or more disabilities in 2019, amounting to 4,849 people. The most common type of disability continues to be ambulatory, meaning difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation. Approximately 4.5% of the population was affected by an ambulatory disability in 2019. This translates to a need for accessible housing with universal design features. As discussed in the 2021 Comprehensive Housing Assessment and Market Study, the demand for Supportive Housing units, a subset of the rental market, is estimated to be between 84-94 elderly households and between 445-509 non-elderly persons. The majority of these units are required to meet the needs of persons with serious mental illness and intellectual/developmental disabilities.¹⁵

Table 11: Disability Type, 2019

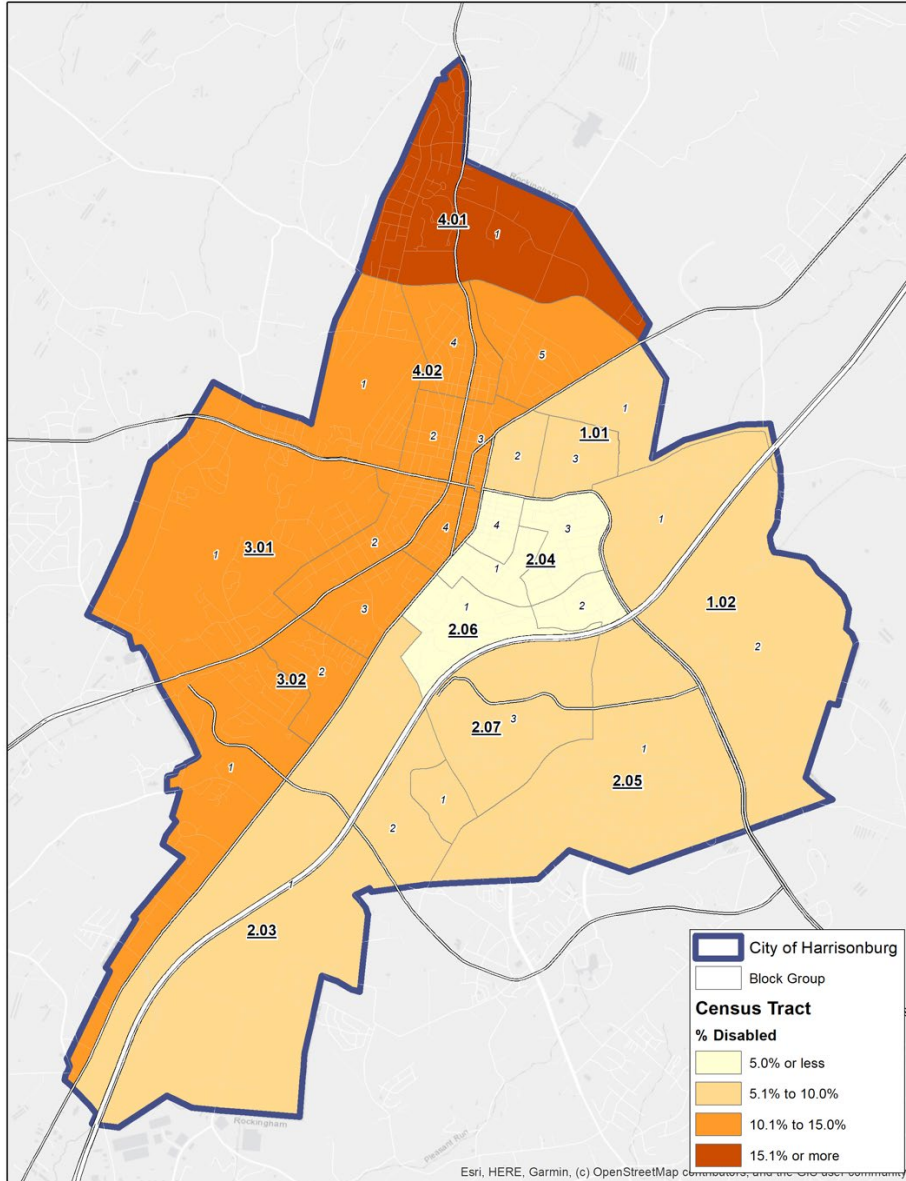
	Number	Percent of Total Population
Hearing Difficulty	1,159	2.2%
Vision Difficulty	920	1.7%
Cognitive Difficulty	2,153	4.1%
Ambulatory Difficulty	2,354	4.5%
Self-Care Difficulty	1,061	2.0%
Independent Living Difficulty	1,893	3.6%

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1810)

¹⁵ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

Persons with disabilities tend to reside more in the northwest and southwest portions of Harrisonburg. Census Tract 4.01 (BG 1) has the highest proportion of residents with disabilities.

Map 12: Disabled Population, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1810)

Cognitive difficulty was the most common type of disability among City residents aged 18-64, and ambulatory difficulty was the most frequently reported type of disability among the elderly aged 65 and over.

The most prevalent disability type among persons 18 to 64 was cognitive difficulty; nearly 30% of persons aged 18 to 64 reported this type of disability, meaning difficulty remembering, concentrating, or making decisions. Cognitive disability was followed closely by ambulatory difficulty in this age group, impacting 22.5% of persons. While approximately 13.0% of Harrisonburg's population aged 18-64 have one or more disabilities, the rate of disability increases to nearly 88% of the population aged 65 and older. Among those in the 65+ age bracket, ambulatory and independent living difficulties are the most common, experienced by over 27.9% and 21.6% of the City's elderly disabled population, respectively.

Older individuals with these types of disabilities may need units without stairs or accessibility modifications to allow aging in place. Many persons with disabilities, regardless of type, require access to adequate transportation systems and human services, because their disability often makes it impossible or impractical to walk or drive as a means of transportation.

There are significant differences in labor force participation rates among persons with and without a disability.

Labor force participation rates in Harrisonburg among persons with one or more disabilities was 47.4% compared to 59.8% among persons without a disability. Among those participating in the labor force, the unemployment rate among disabled persons is 4.5%, just below the City-wide rate of 4.9% in 2019.¹⁶

In Harrisonburg, the median earnings among persons with disabilities was equivalent to 33.9% of the median earnings of persons without disabilities. Persons with disabilities are more likely to live in poverty than persons without disabilities.

Even in the absence of discrimination, people with disabilities often experience greater obstacles in securing affordable housing that is accessible due to the higher potential for lower wages and rates of employment. According to the National Organization on Disabilities, a significant income gap exists for people with disabilities given their lower rate of employment. Among persons aged 16 and older with earnings, the poverty rate is higher for those with disabilities than those without. The poverty rate among persons with a disability was 35.8%, compared to the 30.4% poverty rate experienced by persons

¹⁶ U.S. Census Bureau, 2019 ACS 5-Year Estimates (S2301)

without a disability. In 2019, the median earnings for persons with disabilities was \$11,551, equivalent to 66.1% of the \$17,477 in earnings for persons without a disability.¹⁷

Table 12: Disability Type by Status by Age, 2019

	Number	Percent of Population
Total Population for whom Disability Status is Determined*	52,590	100.0%
Population Under 18	8,709	16.6%
Without a Disability	8,257	94.8%
With One or More Disabilities**	452	5.2%
Hearing Difficulty	58	12.8%
Vision Difficulty	70	15.5%
Cognitive Difficulty	108	23.9%
Ambulatory Difficulty	98	21.7%
Self-Care Difficulty	118	26.1%
Population Ages 18-64	39,363	74.8%
Without a Disability	34,244	87.0%
With One or More Disabilities**	5,119	13.0%
Hearing Difficulty	381	7.4%
Vision Difficulty	590	11.5%
Cognitive Difficulty	1,521	29.7%
Ambulatory Difficulty	1,150	22.5%
Self-Care Difficulty	440	8.6%
Independent Living Difficulty	1,037	20.3%
Population 65 and Older	4,518	8.6%
Without a Disability	549	12.2%
With One or More Disabilities**	3,969	87.8%
Hearing Difficulty	720	18.1%
Vision Difficulty	260	6.6%
Cognitive Difficulty	524	13.2%
Ambulatory Difficulty	1,106	27.9%
Self-Care Difficulty	503	12.7%
Independent Living Difficulty	856	21.6%

* Total population data pertains only to those for whom disability status was determined; therefore totals may not correspond to population totals in other tables.

** Disability status will not equal the sum of disability types due to persons reporting more than one disability. Similarly, the sum of percentages of each disability type will be greater than 100%.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1810)

¹⁷ U.S. Census Bureau, 2019 ACS 5-Year Estimates (B18140, B23024)

Household Type

The Census Bureau defines households as either family or non-family. Family households are married couples with or without children, single parents with children, and other families comprised 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.

Harrisonburg's proportion of family households with children increased for the first time since 2000.

Family households with children in Harrisonburg began to decline as a proportion of total households after 2000 from a high of 47.5% to a low of 43.6% of all households in 2014. However, between 2014 and 2019, family households with children increased to 46.3% by 2019. Non-family households in the City contracted from 49.3% in 2014 to 46.1% of all households.

Female-headed households with children are nearly four times more likely to live in poverty than married couples with children. In 2019, 37.1% of Harrisonburg's female-headed households with children were living below poverty compared to only 9.7% of married couples with children. As a result of lower incomes and higher expenses such as childcare, female-headed households with children often experience difficulty in obtaining housing.¹⁸

Table 13: Households by Family Type, 2014-2019

	Total Households	Family Households											Non-Family Households % of Total
		Married-Couple Family % of Total	Married-Couple Families			Other Family % of Total	Female-Headed Households			Male-Headed Households			
			#	With Children	Without Children		#	With Children	Without Children	#	With Children	Without Children	
2014	15,881	36.5%	5,802	43.6%	56.4%	14.1%	1,495	55.9%	44.1%	751	63.2%	36.8%	49.3%
2019	16,723	34.7%	5,809	46.3%	53.7%	19.1%	2,120	60.4%	39.6%	1,078	59.6%	40.4%	46.1%

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B11001, B11003)

¹⁸ U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1702)

Housing Profile

Key Findings

- Virginia’s housing stock is relatively new with the median year of homes built in 1982; Harrisonburg has a slightly newer housing stock with the median year of homes built in 1986.
- Multi-family units comprised more than 50% of the housing stock in Census Tracts 2.04, 2.07, and 4.01.
- Homeownership rates in Harrisonburg have maintained consistent levels of around 38% over the last 19 years. However, there are variations in homeownership rates by racial/ethnic group. Black and Hispanic households are under-represented among Harrisonburg homeowners.
- Low homeowner and rental vacancy rates in Harrisonburg indicate high levels of competition within the housing market as residents compete for scarce units, and where the lowest income households have the fewest options.
- Rental vacancy rates are generally higher than homeowner vacancy rates throughout Harrisonburg.
- Between 2014 and 2019, the inflation-adjusted median housing value and median gross rent (includes rent plus utility costs) in Harrisonburg declined by 7.8% and 4.8%, respectively, while median household income increased by just over 9%.
- Despite an increase in median household income, average earnings decreased by 2% in 2019 when adjusted for inflation.
- According to the 2021 Comprehensive Housing Assessment and Market Study, there is a “housing mismatch” in Harrisonburg, in which thousands of households live in units that do not align with their income. This housing mismatch has a disproportionately greater impact on lower income households.
- While over 80% of all rental units in Harrisonburg are affordable to households under 80% AMI (\$50,200 for a family of four in 2017), there is a disparity in the distribution of unit affordability by income range.
- There is a lack of rental units affordable and available to households with incomes between 0-30% AMI as well as a lack of higher-end units affordable to households with incomes above 80% AMI.
- The majority of homeowner households have incomes that are above 100% AMI. There are nearly twice as many owner households with incomes above 100% AMI than there are units affordable to households with incomes above 100% AMI.
- Of all owner-occupied units, 8% are affordable to 0-50% AMI households; the remaining 92% of the housing stock is fairly evenly distributed in the 51-80%, 81-100% and 101+% income tiers.
- Housing choice for the lowest income households is greatly restricted by their very limited financial resources.
- In both sales and rental housing markets, cost burden is more common among lower income households and the rate of cost burden decreases as household income rises.

- The level of affordable housing need among renters is much greater than among owner households residing in Harrisonburg.
- As in the rental market, cost burden is more common among lower income households and the rate of cost burden decreases as household income rises.
- Renters are 2.5 times more likely to be cost-burdened than homeowners. However, there are variations in cost-burden by race and ethnicity.

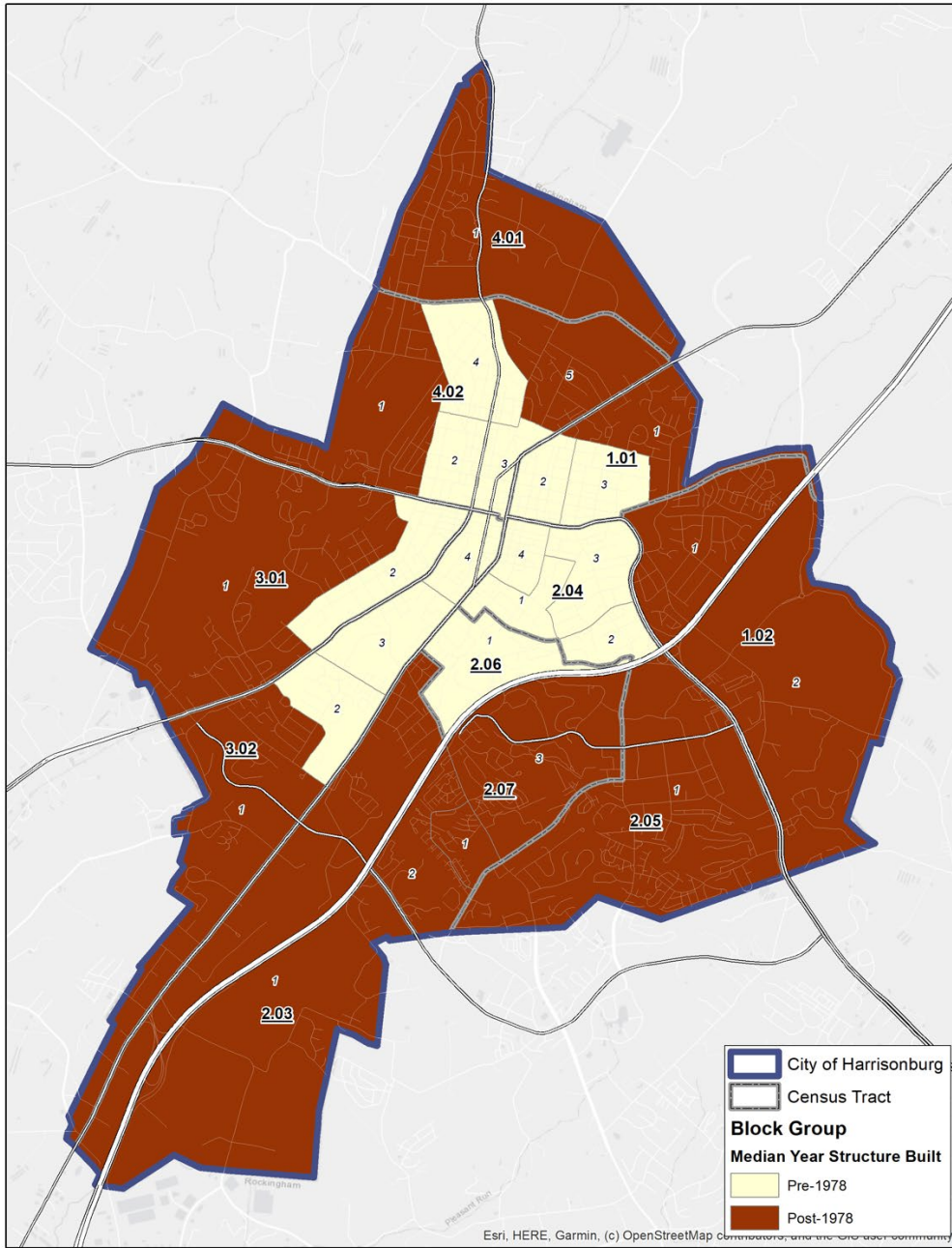
Age of Housing Stock

Older homes typically need mechanical system and energy efficiency upgrades, which may not be financially feasible, particularly among low- and moderate-income households. High energy costs can contribute to cost burden. For persons with health conditions such as asthma, features such as excessive moisture and dampness, inadequate or poorly maintained heating and ventilation systems, and structural defects are associated with exposure to indoor asthma triggers.

Another significant concern is the presence of lead-based paint. In 1978, the federal government banned the use of lead-based paint in homes after studies showed that lead caused severe health problems, particularly among children under the age of six. The nervous systems of children could even be damaged before birth. Although lead-based paint is no longer on the market, many older homes still have lead-based paint on the walls and trim. Scraping paint and sanding old paint can release dust containing lead that, when inhaled, can be harmful.

Virginia's housing stock is relatively new with the median year of homes built in 1982; Harrisonburg has a slightly newer housing stock with the median year of homes built in 1986. However, the City's core neighborhoods include an older housing stock with the median year of homes built prior to 1978.

Map 13: Median Year Structure Built, 2019



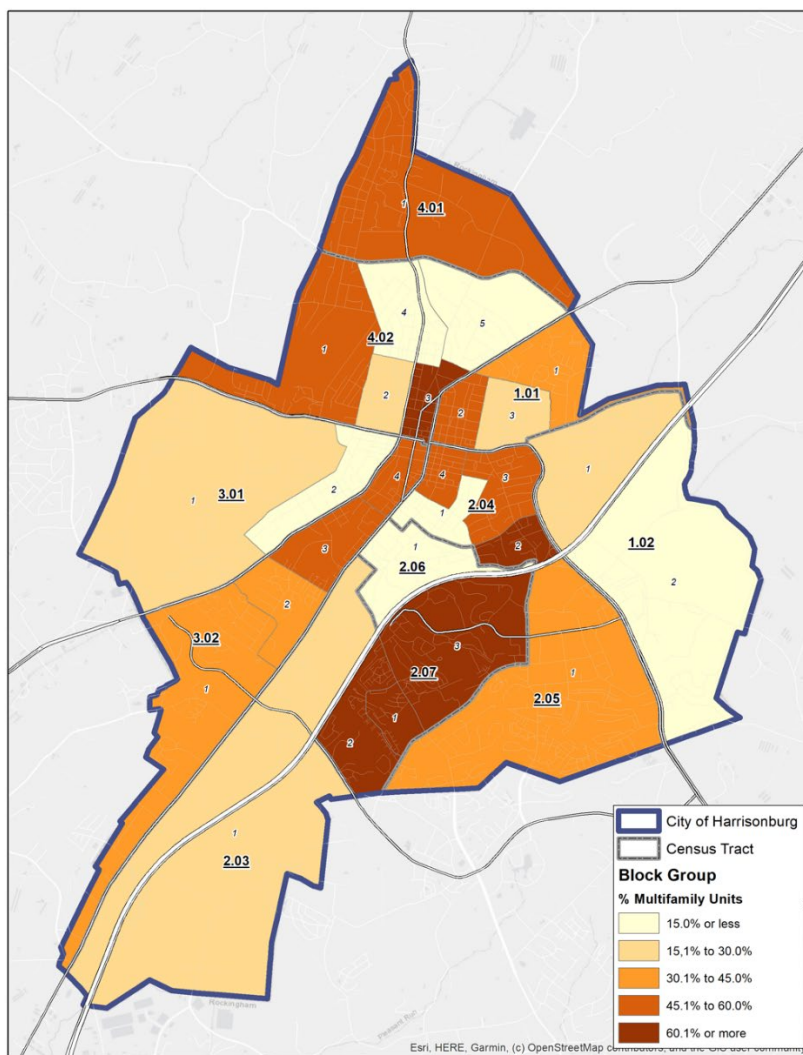
Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25035)

Housing Type

Multi-family units comprised more than 50% of the housing stock in Census Tracts 2.04, 2.07, and 4.01.

In 2019 single-family units comprised 59.0% of the housing stock in Harrisonburg, multi-family units comprised 39.2%, and mobile homes accounted for the remaining 1.8%. The highest proportion of multi-family units were found in Census Tract 2.07 with 72.2%, followed by Census Tracts 4.01 and 2.04, in which multi-family housing units comprised more than 50% of the housing stock in each. Census Tract 2.06 had no multi-family units. Given that this census tract is home to James Madison University's main campus, non-student housing is extremely limited.

Map 14: Multi-Family Housing Units, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25024)

Housing Tenure

According to 2019 ACS 5-year Estimates, 60.4% of Harrisonburg's occupied housing inventory of 16,723 units were renter-occupied and 39.6% were owner-occupied. Of the 6,621 owner-occupied units, 180 units or 2.7% were in multi-family structures. In contrast, rental housing stock had much higher proportions of multi-family units; Harrisonburg had a total of 10,102 renter-occupied units, of which 61.3% were multi-family.¹⁹ Consistent with the 2021 Comprehensive Housing Assessment and Market Study, areas with the highest number of rental units are located in the northeast, south of EMU and east of JMU between Port Republic Road and East Market Street.

The value in home ownership 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."²⁰

Homeownership rates in Harrisonburg have maintained consistent levels of around 38% over the last 19 years. However, there are variations in homeownership rates by racial/ethnic group. Black and Hispanic households are under-represented among Harrisonburg homeowners.

Consistent with trends identified in the 2016 AFH, the average homeownership rate in Harrisonburg was 39.6% in 2019. Historically, minorities tend to have lower home ownership rates. In 2019 White households comprised 78.4% of all households, while accounting for 91.0% of the City's homeownership rate. Black households and Hispanic households account for 6.4% and 15.7%, respectively, of all households, yet comprise only 3.6% and 10.2% of homeowners. Asian households are proportionally represented among homeowners in Harrisonburg; while comprising 3.2% of all households, Asian households account for 3.7% of homeowners.²¹

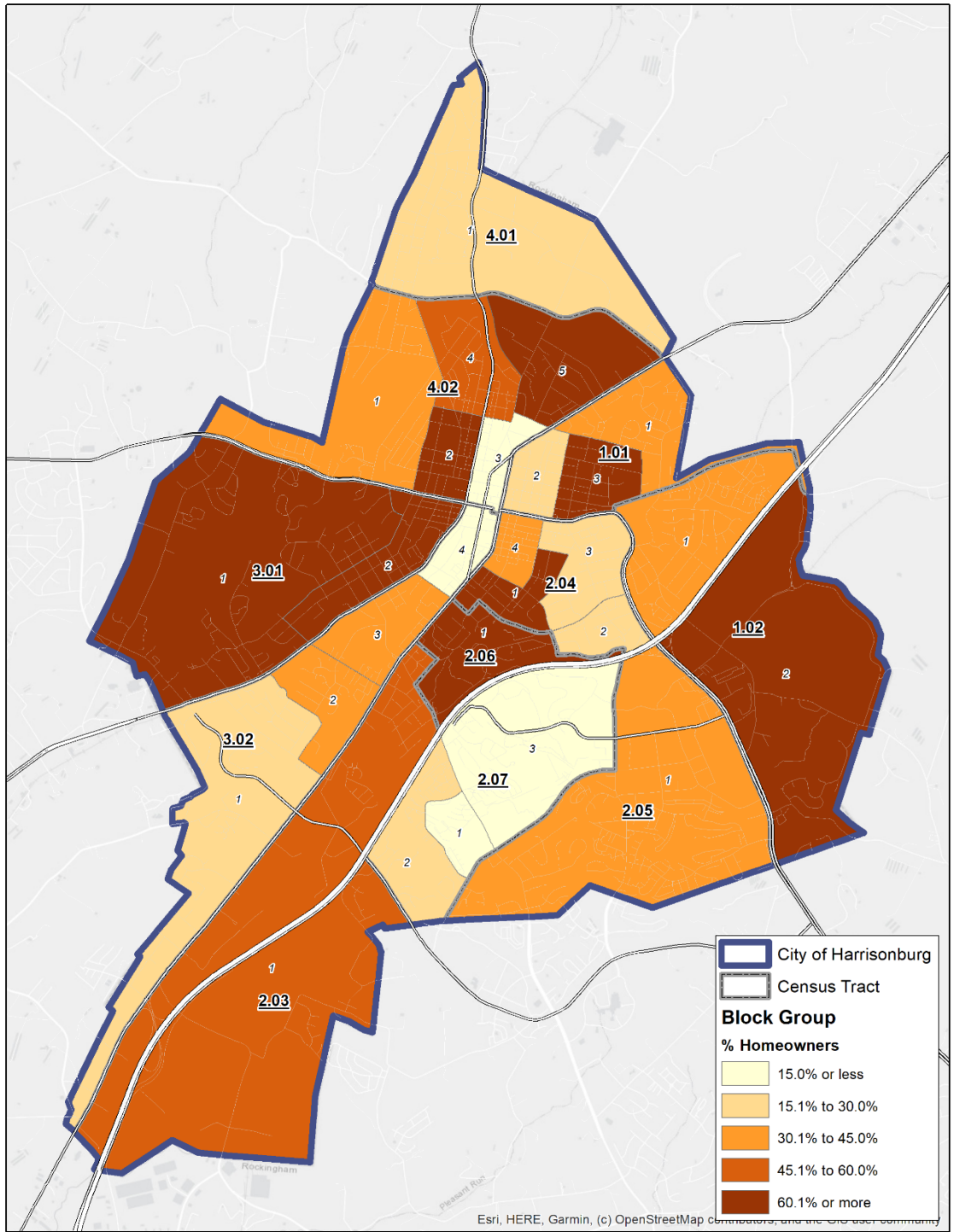
¹⁹ U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25032)

²⁰ 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.

²¹ U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25003)

Overall, census tracts with the highest homeownership rates tended to have lower poverty rates and lower proportions of racial and ethnic minorities.

Map 15: Homeownership Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25003)

Vacancy Rates

Low homeowner and rental vacancy rates in Harrisonburg indicate high levels of competition within the housing market as residents compete for scarce units, and where the lowest income households have the fewest options.

Vacancy rate, as defined by the American Community Survey, is the ratio of vacant available units to total units. Homeowner vacancy is the ratio of vacant (available for-sale and sold) housing units to the total number of vacant and owner-occupied housing units. A vacancy rate of 2% indicates a healthy sales market with adequate inventory. With a homeowner vacancy rate of 1.4%, vacancy is low throughout the City. Census Tract 3.01 has a higher vacancy rate of 3.9%, which reveals a potentially greater availability of homeownership opportunities for households in this area, depending on the quality of the units.²²

Rental vacancy rates are generally higher than homeowner vacancy rates throughout Harrisonburg.

Like homeowner vacancies, rental vacancies are the ratio of vacant available for-rent and rented unoccupied units to the total number of vacant available and rental-occupied housing units. A rental vacancy of 5-7% is considered healthy. Using 5% as the benchmark, Harrisonburg is split between having an extremely competitive market and one with excess inventory. Census Tract 2.07 has the highest rental vacancy rate of 8.7%. At the opposite extreme, Census Tracts 2.04 (an R/ECAP) and 4.01 each have rental vacancies of 0.9%.²³

Nearly 30% of all vacant units across Harrisonburg are vacant for reasons other than currently being for rent or sale, rented or sold but not occupied, or as a seasonal home. The category of “Other” vacant includes units held for occasional use by the owners, temporarily occupied by persons with usual residences elsewhere (e.g., short-term rentals), or vacant for other reasons (used as storage, intentionally held off-market, etc.).

Table 14: Vacancy Status by Tenure, 2019

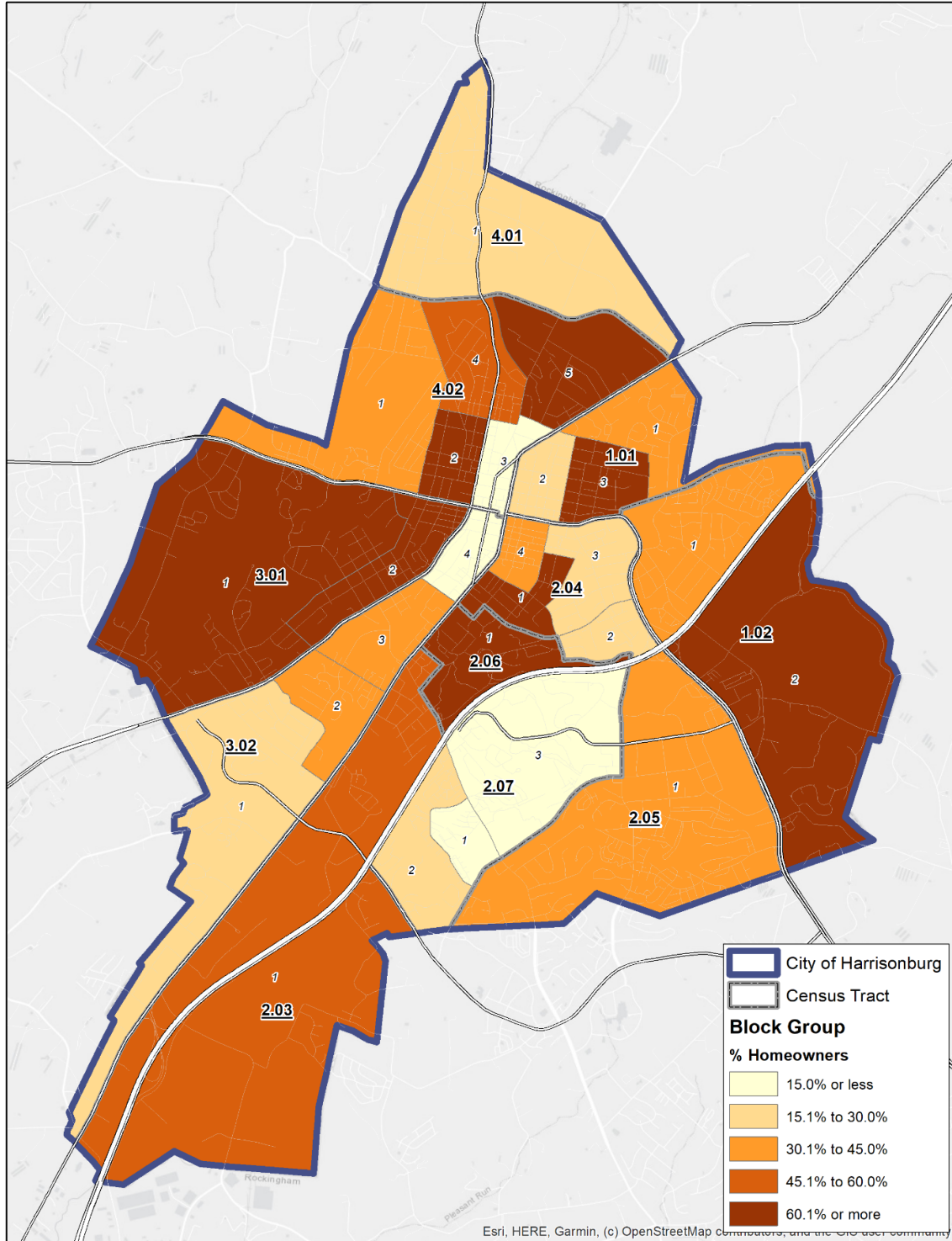
	#	%
Total Vacant Units	1,538	100%
For rent	442	29%
For sale	92	6%
Rented or sold, not occupied	528	34%
For seasonal, recreational, or occasional use	36	2%
Other Vacant	440	29%

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25004)

²² U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

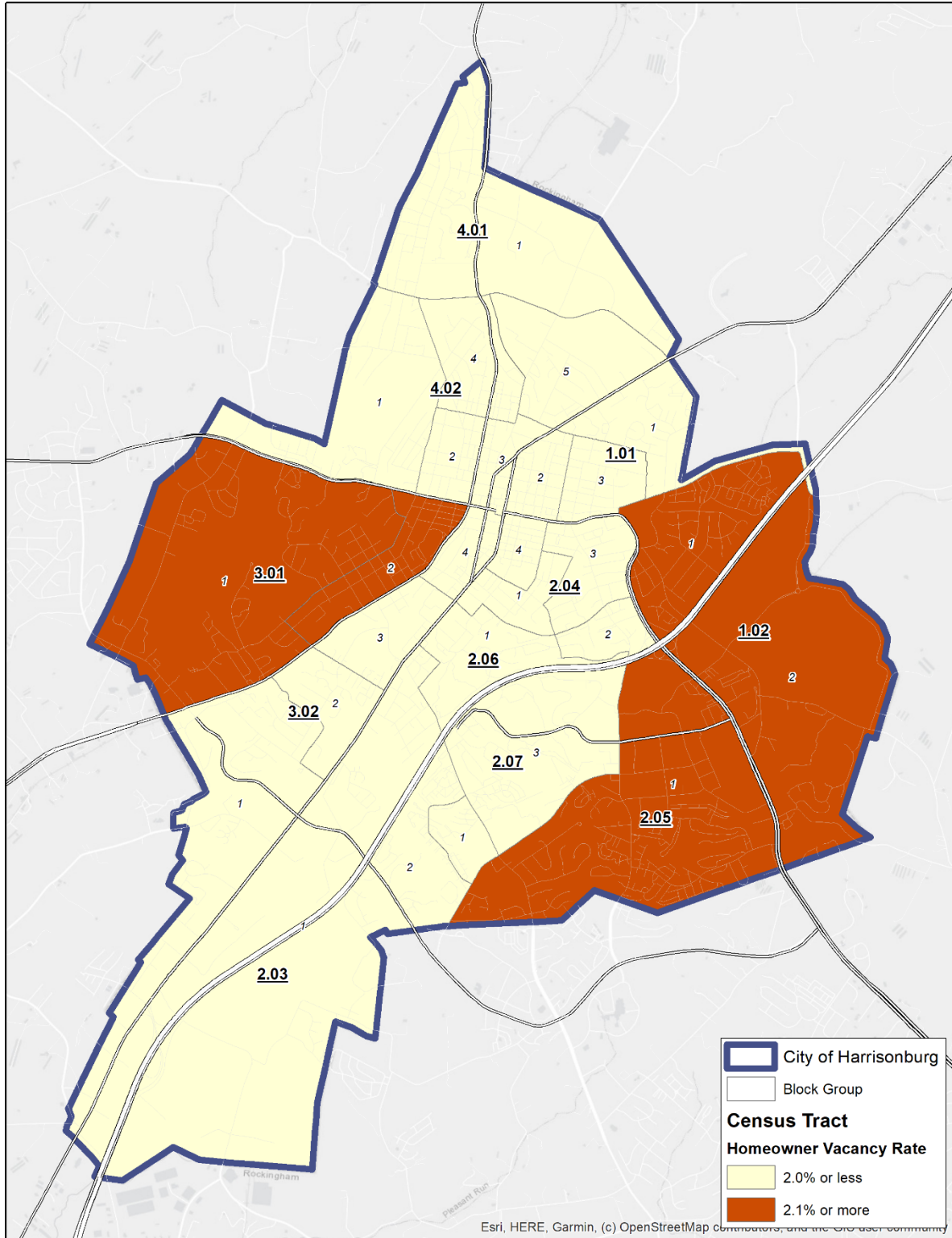
²³ U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

Map 16: Homeowner Vacancy Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

Map 17: Renter Vacancy Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

Housing Affordability

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. Home values are often used as a proxy for other non-market goods affecting quality of life, such as accessibility to public transit and green space, growth potential in terms of population and development, quality of schools, and more.

Between 2014 and 2019, the inflation-adjusted median housing value and median gross rent (includes rent plus utility costs) in Harrisonburg declined by 7.8% and 4.8%, respectively, while median household income increased by just over 9%.

With owner-occupied housing costs declining as household income increased, homeownership would seemingly have become more affordable for Harrisonburg residents. Renting also would have appeared to become more affordable, though median gross rent declined to a lesser extent than median housing values.

Table 15: Harrisonburg Housing Affordability

	2014	2019	% Change
Median Housing Value	\$ 220,803	\$ 203,600	-7.8%
Median Gross Rent	\$ 927	\$ 883	-4.8%
Median Household Income	\$ 42,694	\$ 46,679	9.3%

All 2014 variables have been adjusted for inflation into 2019 dollars.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25077, B25064, B19013)

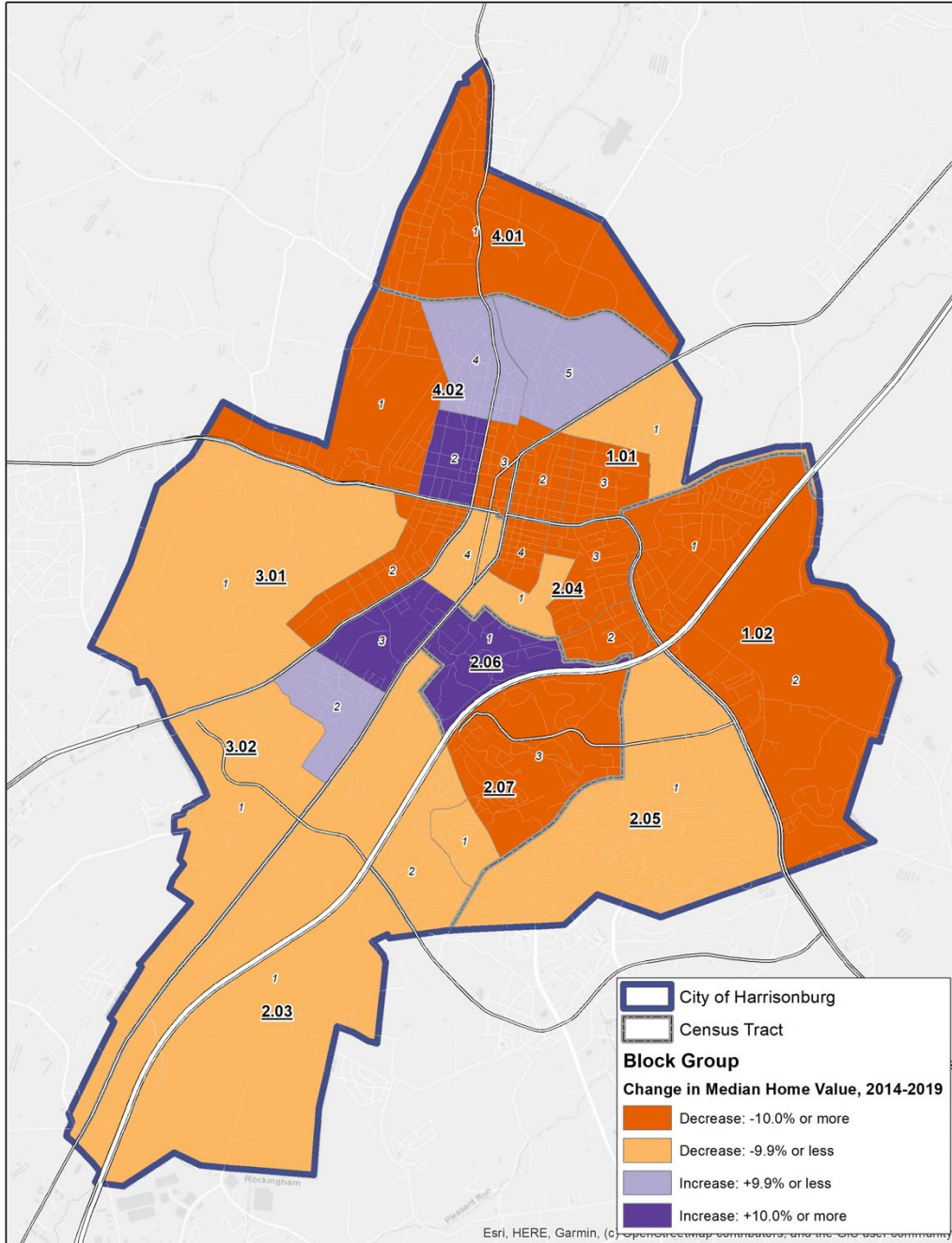
Despite an increase in median household income, average earnings decreased by 2% in 2019 when adjusted for inflation.

Average earnings across all industries increased from \$38,130 in 2010 to \$43,488 in 2019. When adjusted for inflation, this apparent increase in average earnings was actually a *decrease* of 2%. Largely stagnant wages and increases in the cost of living means that many struggle to meet basic household needs.²⁴ As a result, households below median income still struggle to find and maintain affordable housing.

²⁴ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

Census Tracts 4.02 (BG 2, 4, 5), 2.06 (BG 1), and 3.02 (BG 2, 3 – an R/ECAP) experienced increases in median home values, while declines were noted in the rest of the City.

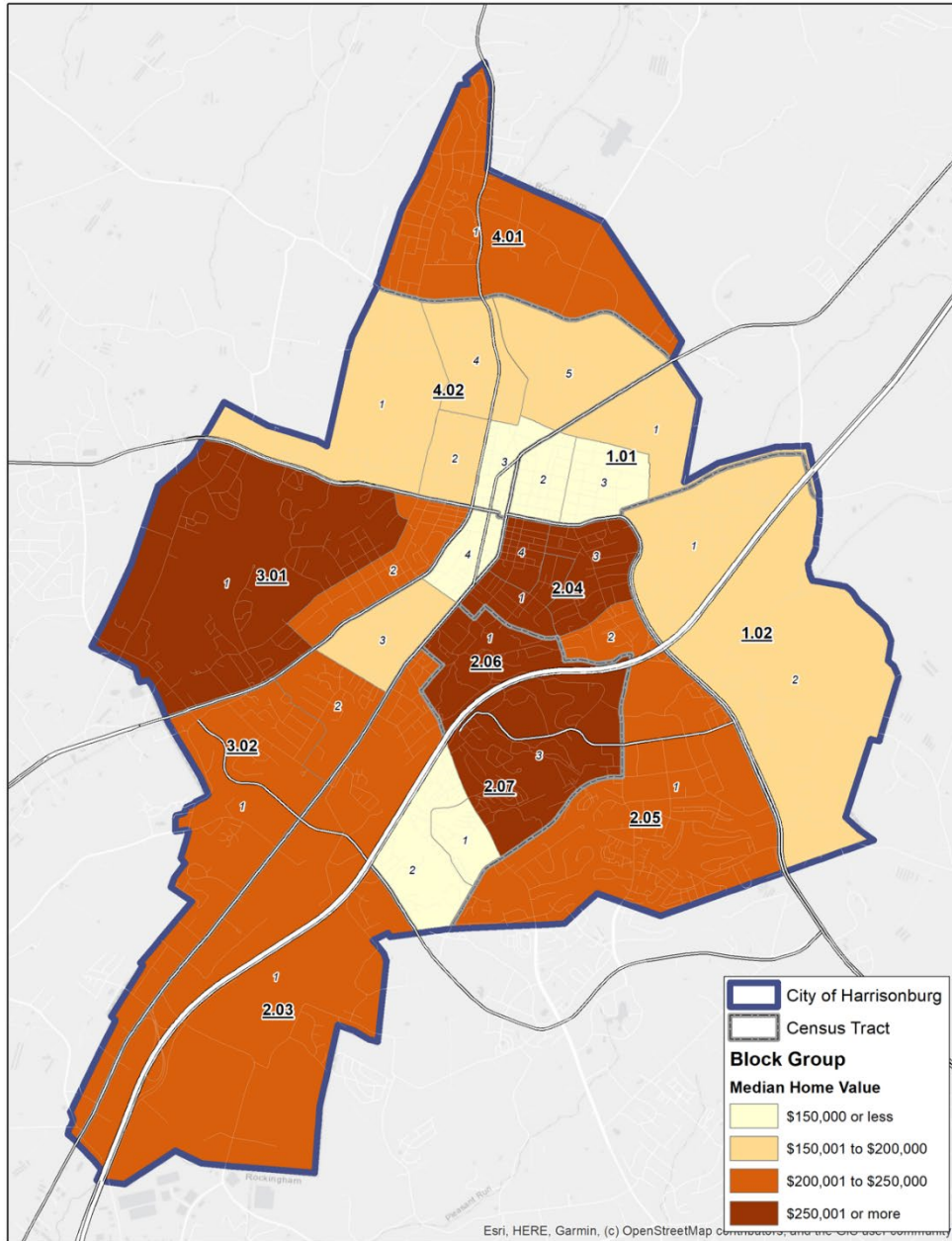
Map 18: Change in Median Housing Value, 2014-2019



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25077)

Areas with the highest median home values tended to correspond with lower rates of poverty and lower concentrations of racial and ethnic minorities. Census Tract 2.04 is an exception to this pattern with higher poverty concentrations in all block groups, including Block Group 3, a designated R/ECAP.

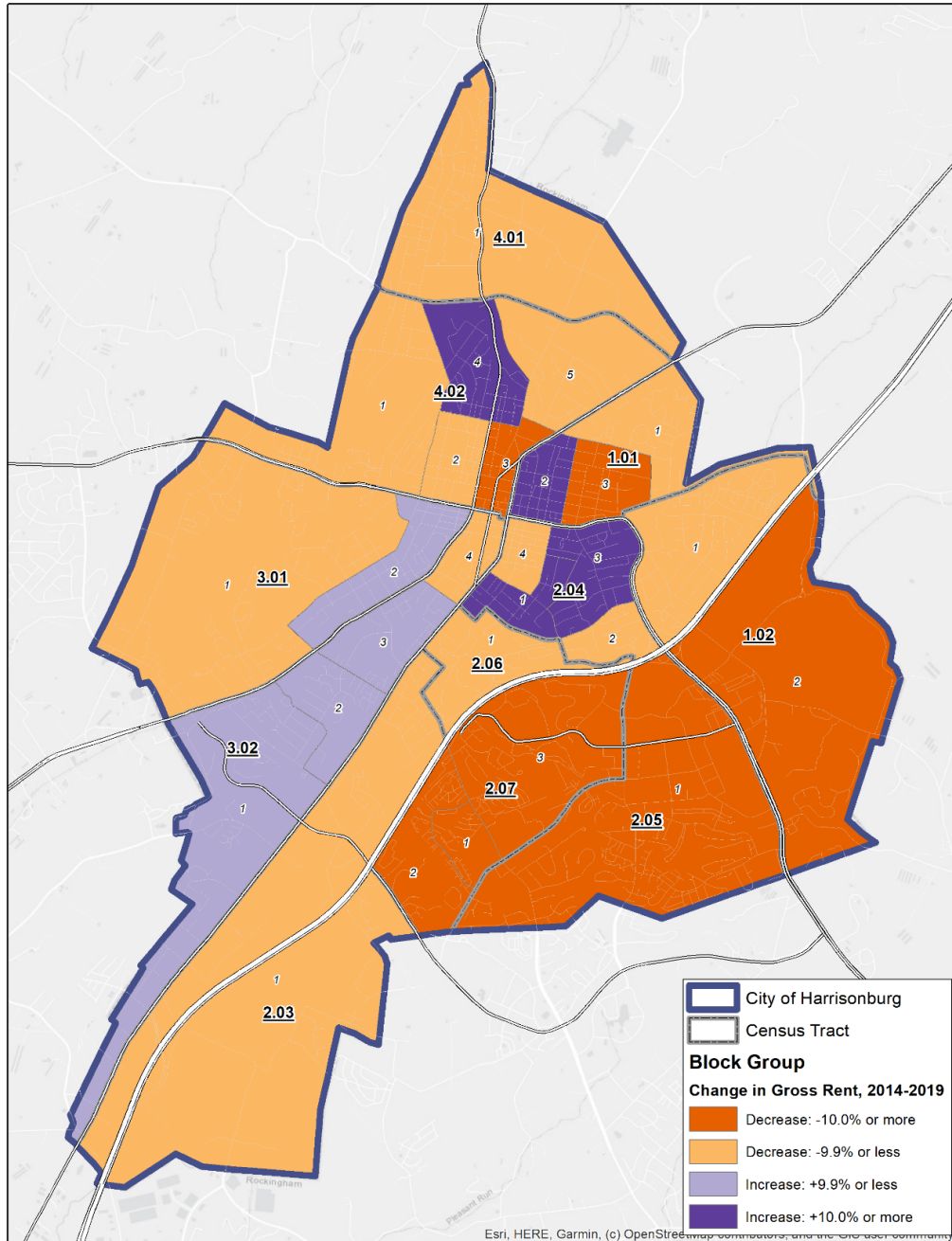
Map 19: Median Housing Value, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25077)

Areas that experienced the greatest increase in median gross rent tended to correspond with higher rates of poverty in Census Tracts 3.02 (BG 1-3, with BG 3 a designated R/ECAP) and 2.04 (BG 1, 3 – a designated R/ECAP).

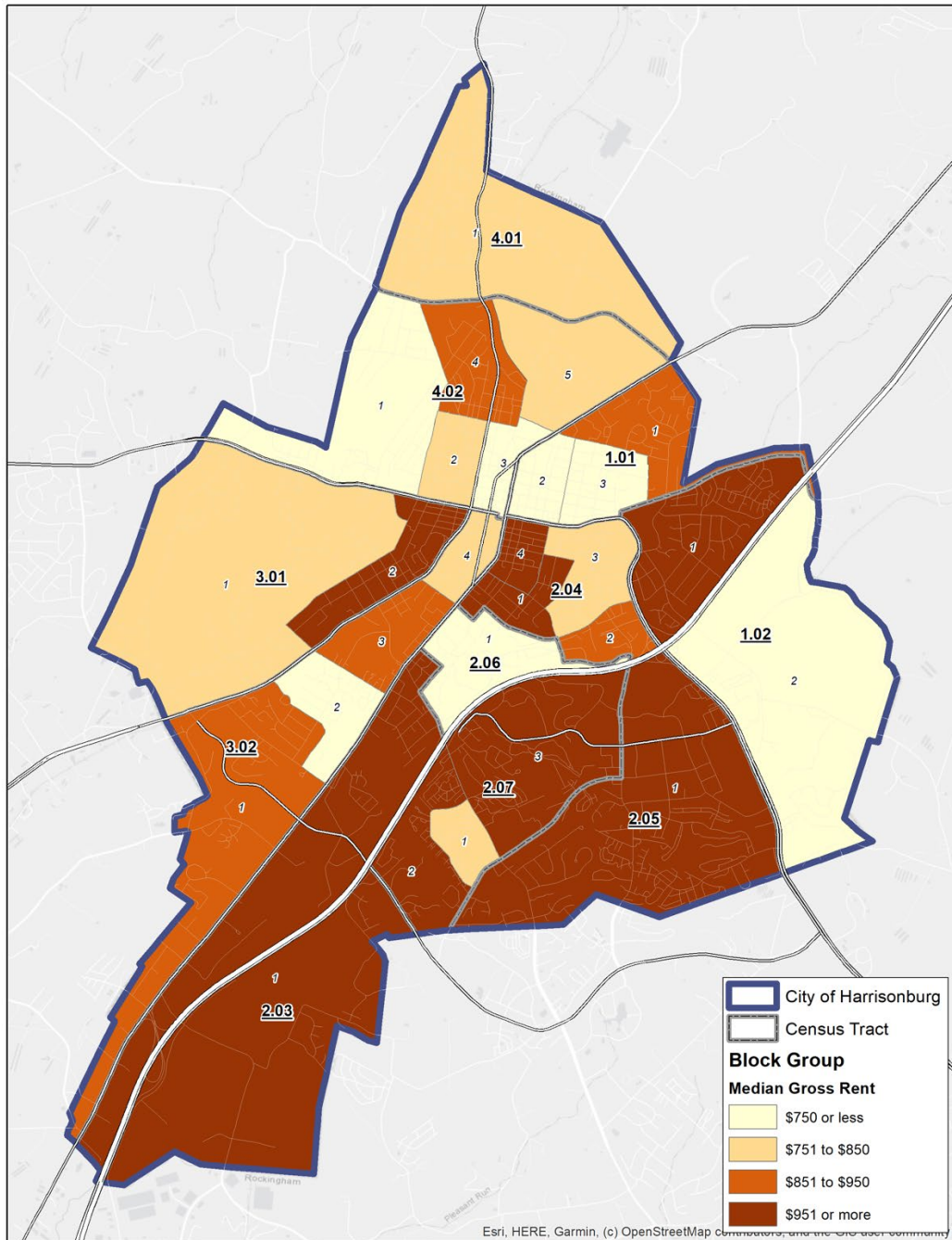
Map 20: Change in Median Gross Rent, 2014-2019



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25064)

Consistent with the 2016 AFH, central and southern census tracts experienced the highest increase in rents between 2000 - 2014 and have continued to become more expensive. The most affordable rental units are available in the north and in Census Tract 1.02 (BG 2) in the southeast.

Map 21: Median Gross Rent, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25064)

According to the 2021 Comprehensive Housing Assessment and Market Study, there is a “housing mismatch” in Harrisonburg, in which thousands of households live in units that do not align with their income. This housing mismatch has a disproportionately greater impact on lower income households.

A housing affordability problem can occur for multiple reasons, including when there is a shortage of units and/or because there are higher income households residing in units that are affordable to lower income households. Both of these factors hold true within Harrisonburg’s rental market, resulting in a “housing mismatch.”

While over 80% of all rental units in Harrisonburg are affordable to households under 80% AMI (\$50,200 for a family of four in 2017), there is disparity in the distribution of unit affordability by income range.²⁵

The vast majority of rental units are naturally occurring affordable housing, which refers to housing developed without public funding. These units are affordable to households earning up to 80% AMI. Eighty-one percent of all rental units are affordable to households with incomes up to 80% AMI. However, the existence of units that are affordable to households with incomes below 80% AMI does not guarantee that there will be an availability of these units within specific income ranges.²⁶

Table 16: Occupied Units by Monthly Rent, 2014-2019

	2010-2014		2015-2019		Percent Change 2010-2019
	# Units	%	# Units	%	
Renter-Occupied Units	10,210	64.3%	10,102	60.4%	-1.1%
Less than \$500	920	9.0%	953	9.4%	3.6%
\$500 to \$999	5,453	53.4%	4,965	49.1%	-8.9%
\$1,000 to \$1,499	2,146	21.0%	2,735	27.1%	27.4%
\$1,500 or more	1,501	14.7%	1,086	10.8%	-27.6%
No rent paid	190	1.9%	363	3.6%	91.1%
Median Gross Rent (2019 dollars)	\$927		\$883		-4.7%

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP04)

²⁵ Area Median Income (AMI): The AMI for a jurisdiction is determined by HUD and *includes adjustments in income based on household size.*

²⁶ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study.*

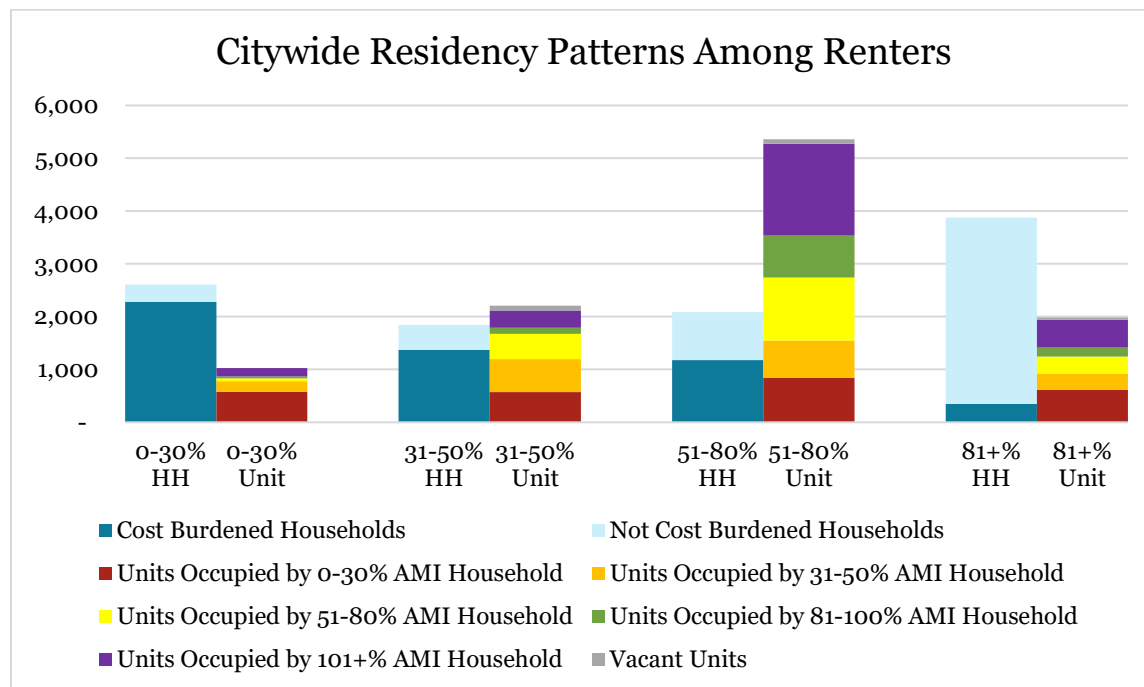
Higher income households have more options by virtue of their income levels. Housing choice for the lowest income households, however, is greatly restricted by their very limited financial resources. Because there are many more households with incomes above 80% AMI but very few units available for this income tier, these higher income households occupy rental units that cost less, thereby increasing competition among lower income households for the affordable units. When higher income households reside in lower cost housing, they are effectively “squeezing out” lower income households—who, because they are lower income, have the fewest housing options.

There is a lack of rental units affordable and available to households with incomes between 0-30% AMI, as well as a lack of higher-end units for households with incomes above 80% AMI.

There are significantly more households than units in the 0-30% AMI tier. This tier includes most student households (including dependent and independent students), persons needing supportive housing, elderly households, and other household types that are non-student, non-elderly households.

The lowest income group (up to \$19,410 for a family of four in 2017) has the smallest housing inventory available and affordable to them. The lack of available and affordable units is because there is both a shortage of units affordable to this income tier relative to the number of households and many of the units that do exist are occupied by households with higher incomes.²⁷

Figure 2: Rental Housing Mismatch



Source: 2021 *Comprehensive Housing Assessment and Market Study* (2013-2017 CHAS)

²⁷ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

The majority of homeowner households have incomes that are above 100% AMI. There are nearly twice as many owner households with incomes above 100% AMI than there are units affordable to this income tier.

Of all owner-occupied units, 8% are affordable to 0-50% AMI households; the remaining 92% of the housing stock is fairly evenly distributed in the 51-80%, 81-100% and 101+% income tiers.

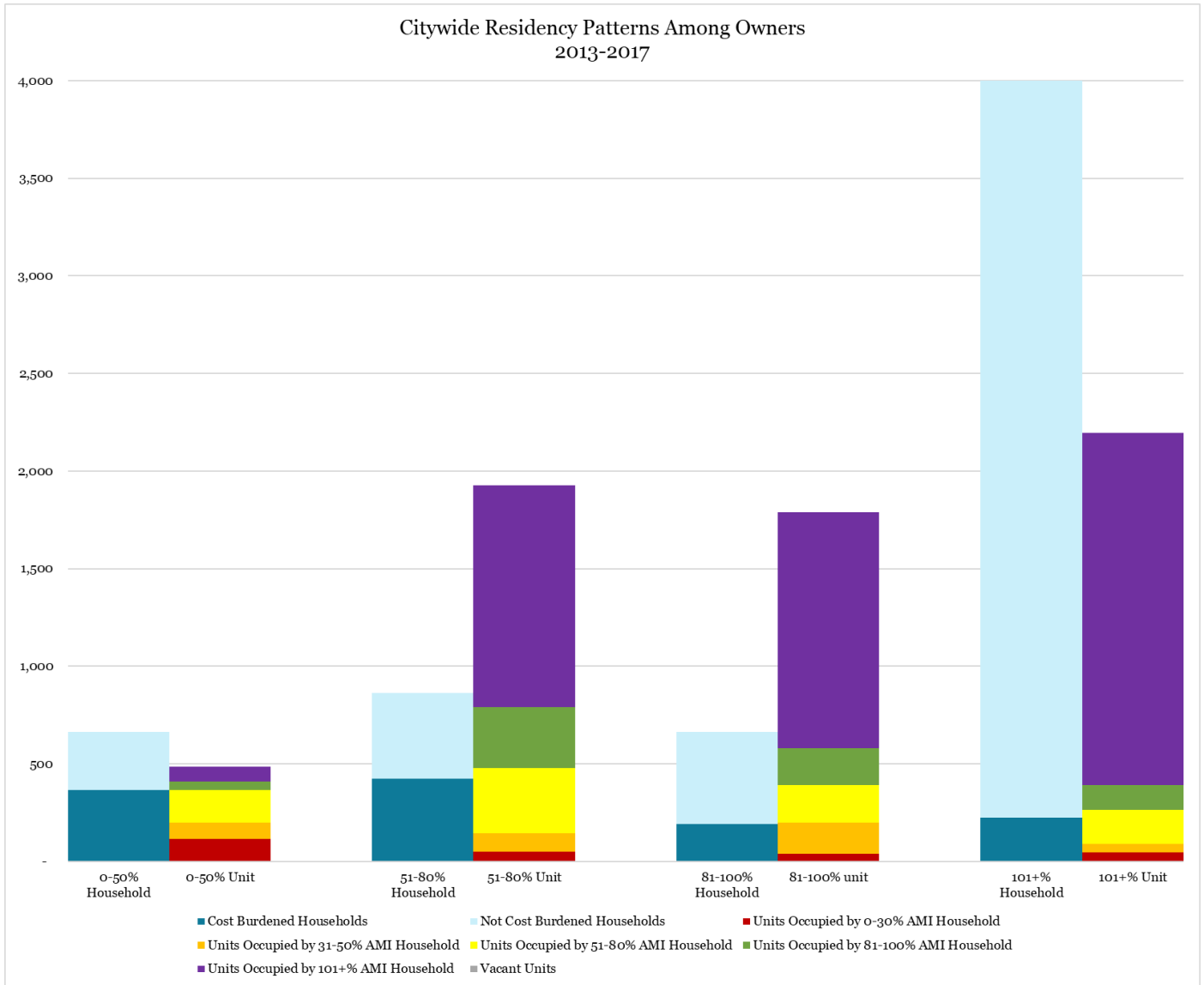
There are slightly more 0-50% AMI households than there are units affordable to this income tier. However, fewer than 100 households at 0-50% AMI are residing in the approximate 600 units affordable to this income tier. The remaining 500 units are occupied by households at higher income tiers. A similar situation exists at the opposite end of the spectrum but to a more exaggerated degree. Of the 4,000 households at 101+% AMI, only about 1,800 are living in the units affordable to this income tier. The remaining 2,200 households (shown in purple) are split primarily between the 51-80% units and the 81—100% units.²⁸

Potentially by choice but also potentially due to lack of inventory, higher income households occupy units that are affordable to households with lower incomes. There is no way to predict the reasons that a particular household would buy a home that is affordable below their “expected” income tier; the reasons could include not wanting to have high housing costs, having other debt obligations such as car loans and student loans, obligations in caring for an aging parent or adult child, and/or lack of availability of units in the homebuyer’s tier.²⁹

²⁸ CHAS data does not include data on when homeowners purchased the home, indicating that some households may have purchased their home many years ago and the unit has since appreciated, which could contribute to the mismatch in household income and housing unit affordability. It also does not include data on how household income has changed since purchasing the home, which could also impact the mismatch.

²⁹ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

Figure 3: Homeowner Housing Mismatch



Cost Burden

Housing choice for the lowest income households is greatly restricted by their very limited financial resources.

Cost burdened households are defined by HUD as households spending more than 30% of their monthly income on housing costs. Severely cost burdened households spend more than 50% of their income. Cost burden serves as an indicator of a homeowner's ability to afford property maintenance and improvements. Regardless of tenure, as a household spends an increasing proportion of its income on housing costs, there is less disposable income available for other necessities such as groceries, health care, transportation, and childcare.

In both sales and rental housing markets, cost burden is more common among lower income households but the rate decreases as household income rises.³⁰

The median renter income in Harrisonburg for 2019 was \$32,628, equivalent to 43% of the \$76,309 homeowner-median income and the City-wide median. The maximum monthly gross rent a household would be able to afford at the median renter income without being cost-burdened was \$915, which was slightly higher than the City's actual median gross rent of \$883. This indicates that the median renter income is adequate to afford the median gross rent.³¹

³⁰ City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

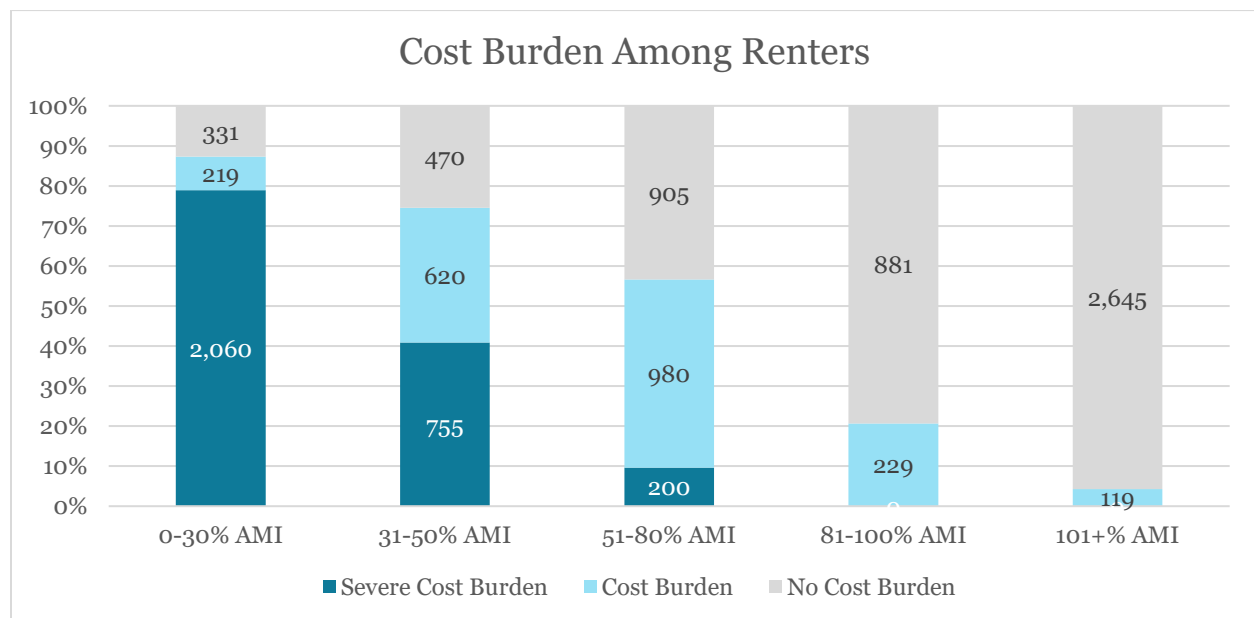
³¹ U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25119)

The level of affordable housing need among renters is much greater than among owner households residing in Harrisonburg.

In Harrisonburg, renters with incomes in the lower end of the income spectrum are not only more frequently cost burdened but also more severely cost burdened, which leaves these households less income for other necessities. Among cost burdened households, there is a peak among the 51-80% AMI households. These households may be housed in a unit that is within their tier but still be cost burdened (i.e., household income of 55% AMI but a unit that is affordable at 75% AMI).

More than 3,600 lower income renter households are cost-burdened and pay more than 30% of their income on housing costs. More than 2,200 households living on less than \$19,410 (less than 30% of the area median income) pay more than 30% of their income on monthly housing costs. Another 1,370 households living on \$19,411-\$32,350 (31-50% of the area median income) pay more than 30% of their income on monthly housing costs. By comparison, only 367 owner households in these same income categories are cost-burdened.³²

Figure 4: Cost Burden Among Renters



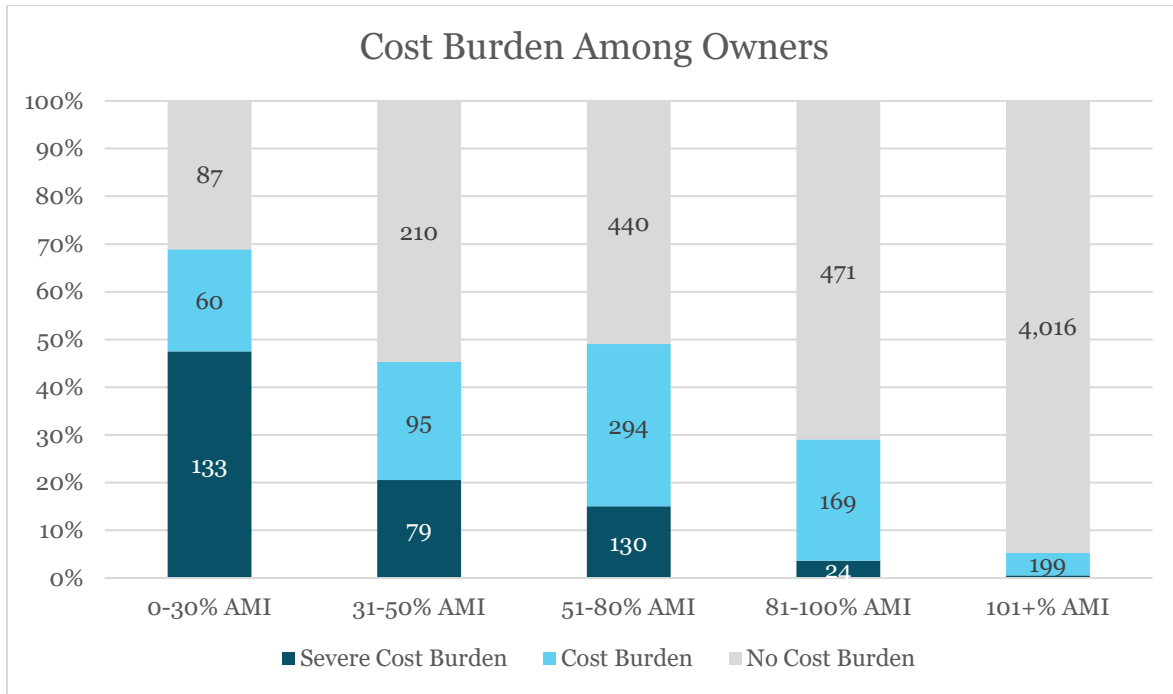
Source: 2021 *Comprehensive Housing Assessment and Market Study* (2013-2017 CHAS)

³² City of Harrisonburg. (2021). *Comprehensive Housing Assessment and Market Study*.

As in the rental market, cost burden is more common among lower income households with the rate decreasing as household income rises.

As within the rental market, rates of severe cost burden are more prevalent among the lowest-income homeowners, and cost burden peaks among households with incomes between 51-80% AMI.

Figure 5: Cost Burden Among Owners



Source: 2021 *Comprehensive Housing Assessment and Market Study (2013-2017 CHAS)*

Renters are 2.5 times more likely to be cost-burdened than homeowners. However, there are variations in cost-burden by race and ethnicity.

Nearly half (48.1%) of renter-occupied households were cost-burdened in 2017 compared to 18.2% of owner-occupied households. Asian and Hispanic homeowners are more likely to be cost-burdened than White homeowners in Harrisonburg. Among renters, Black households are more likely to be cost-burdened than Whites, while Asian and Hispanic renters have lower rates of cost-burden than White households.³³

Table 17: Cost Burden Status by Race/Ethnicity and Tenure, 2017

	Total Households		Cost Burdened Households			
	Owners	Renters	Owners		Renters	
			Number	Percentage	Number	Percentage
White, non-Hispanic	5,390	7,065	970	18.0%	3,655	51.7%
Black, non-Hispanic	165	1,015	29	17.6%	585	57.6%
Asian, non-Hispanic	250	230	50	20.0%	65	28.3%
Hispanic	570	1,780	175	30.7%	770	43.3%

Source: 2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

³³ 2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

Other Relevant Data

Communities of Opportunity

A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families, which are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.” Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment. The rationale for this analysis is to help communities determine where to invest housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. R/ECAPs) could be counter-productive and not meet the spirit of the goals of HUD programs. This does not mean, however, that R/ECAPs should be ignored by communities. Residents in R/ECAPs still need services and high-quality places to live and stabilizing and improving conditions in the lowest-income neighborhoods remains a key priority. Rather, investment should be balanced between existing R/ECAPs (improving the quality of life for residents who want to remain in their neighborhoods) and other communities that offer opportunities and advantages for families and individuals.

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. The resulting maps allow communities to analyze opportunity, comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities. The combination of identifying R/ECAPs and Communities of Opportunity creates a holistic approach to community investment.

An Opportunity Index was developed to classify and visualize areas of opportunity for Harrisonburg residents. The Opportunity Index identifies areas in which new affordable housing developments may be more financially feasible in the long-term due to proximity to factors that allow residents to have successful access to employment, quality education, and a healthy environment. The data is linearly normalized to values between 0 and 1, after which census tracts are classified as having High Opportunity if they have a score above the median and Low Opportunity if they have a score below the median.

Education Index

The education score was determined using Great Schools data (www.greatschools.org). It is acknowledged that there are many ways to measure the degree to which schools are successful in educating students. However, the following data were included in the calculations:

1. Percentage of all students in the school who are proficient in math
2. Percentage of all students in the school who are proficient in reading
3. The difference in the percentage of non-low-income³⁴ students who are proficient in math and the percentage of low-income students and who are proficient in math, and
4. The difference in the percentage of non-low-income students who are proficient in reading and the percentage of low-income students and who are proficient in reading.

Each of the four data points listed above were normalized between zero and one, with one being the preferred score. For example, it is preferable for a higher percentage of students to be proficient in math and reading but for the difference in proficiency to be small among low-income versus non-low-income students. A score of 0.5 would indicate that the school ranked exactly in the middle of the best and worst performing schools; a score of 0.5 does not indicate the median.

Note that the highest performing public elementary school in Harrisonburg has a Great Schools rank of 3 on a 1-10 scale, indicating that Harrisonburg public schools are performing below the state average according to Great Schools. Because all schools are rated the same overall score according to Great Schools, it indicates that all elementary schools are similar in performance, particularly when compared to all elementary schools in Virginia. *The Education Index is designed to highlight differences among schools, even when those schools are similar to each other.* This is why the map shows that there are Highest, Higher, Lower, and Lowest performing schools, even when all schools are similar as determined by Great Schools.

³⁴ According to Great Schools, a low-income student is one who qualifies for free or reduced lunch.

Table 18: Great Schools Data for Harrisonburg Elementary Schools

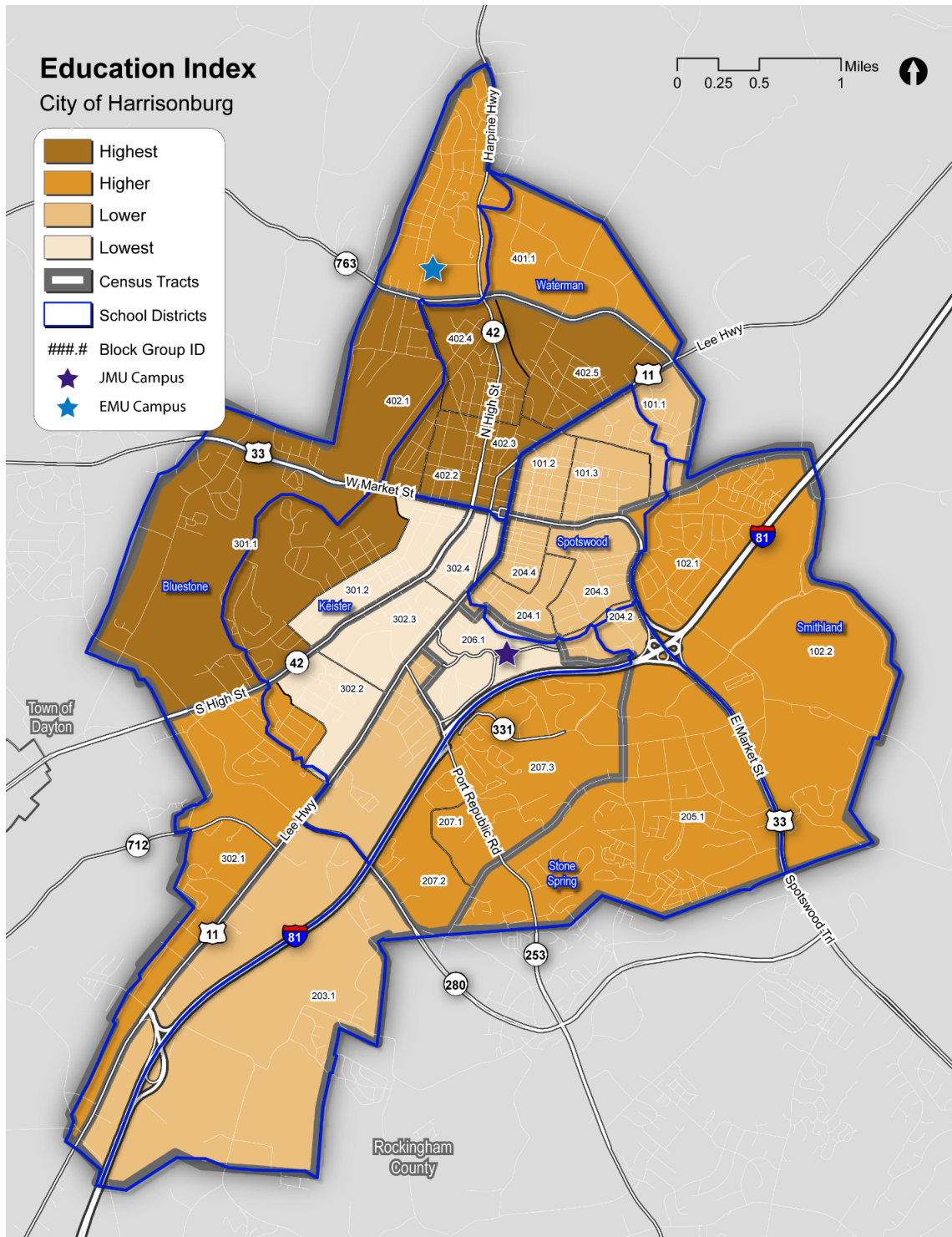
	Percentage of Students Proficient in Math				Percentage of Students Proficient in Reading			
	All Students	Low-Income Students	Not Low-Income Students	Difference between Low-Income and non-Low-Income Students	All Students	Low-Income Students	Not Low-Income Students	Difference between Low-Income and non-Low-Income Students
Bluestone Elementary	76	73	83	10	63	52	86	34
Keister Elementary	52	43	89	46	50	34	86	52
Smithland Elementary	71	67	83	16	56	48	79	31
Spotswood Elementary	58	56	75	19	42	38	83	45
Stone Spring Elementary	70	65	81	16	59	45	84	39
Waterman Elementary	73	70	83	13	62	58	78	20

Source: Great Schools

School district boundaries and block group boundaries do not align exactly. To align the school data to the block group level, the percentage of each block group’s area that is located in each elementary school district boundary was determined. Using the score for each elementary school and the total area of each block group in each elementary school boundary, an education score for each block group was determined. This methodology assumes that elementary-aged children live uniformly throughout each block group, which is known to not be likely, but there is no data source available that would indicate where elementary-aged children live within a block group to be able to assign children to the proper school. The data was mapped by quartile and indicate areas of highest, higher, lower, and lowest access by block group.

Consistent with the 2016 AFH, the geographic distribution of proficient schools is relatively uniform throughout most of Harrisonburg. The City center—bounded roughly by Lee Highway and West Market Street Main (north and west), and by I-81, Port Republic Road, and Lee Highway (south and east)—continues to have the lowest Education Index scores with higher and highest index scores located around the urban fringe. The designated R/ECAP block groups also correspond with lower and lowest Education Index scores with the exception of R/ECAP Census Tract 2.05 (BG 1) and 2.07 (BG1), which have higher index scores consistent with areas around the City’s periphery.

Map 22: Education Index



Source: Great Schools

Jobs Proximity Index

The Jobs Proximity Index quantifies the accessibility of a given block group as a function of its distance to all job locations within the area and factors in competition for those jobs (i.e., how many workers are nearby). The index is a combination of unemployment rates, labor force participation rates, mean commuting time, and percent of the population with at least a bachelor's degree within a census tract. Employment opportunities are necessary for individuals to afford stable housing. Labor force participation represents the amount of labor resources available for the production for goods and services. Mean commuting time indicates ease of access to centers of employment. The percent of the population with at least a bachelor's degree is used to estimate the availability of skilled labor.

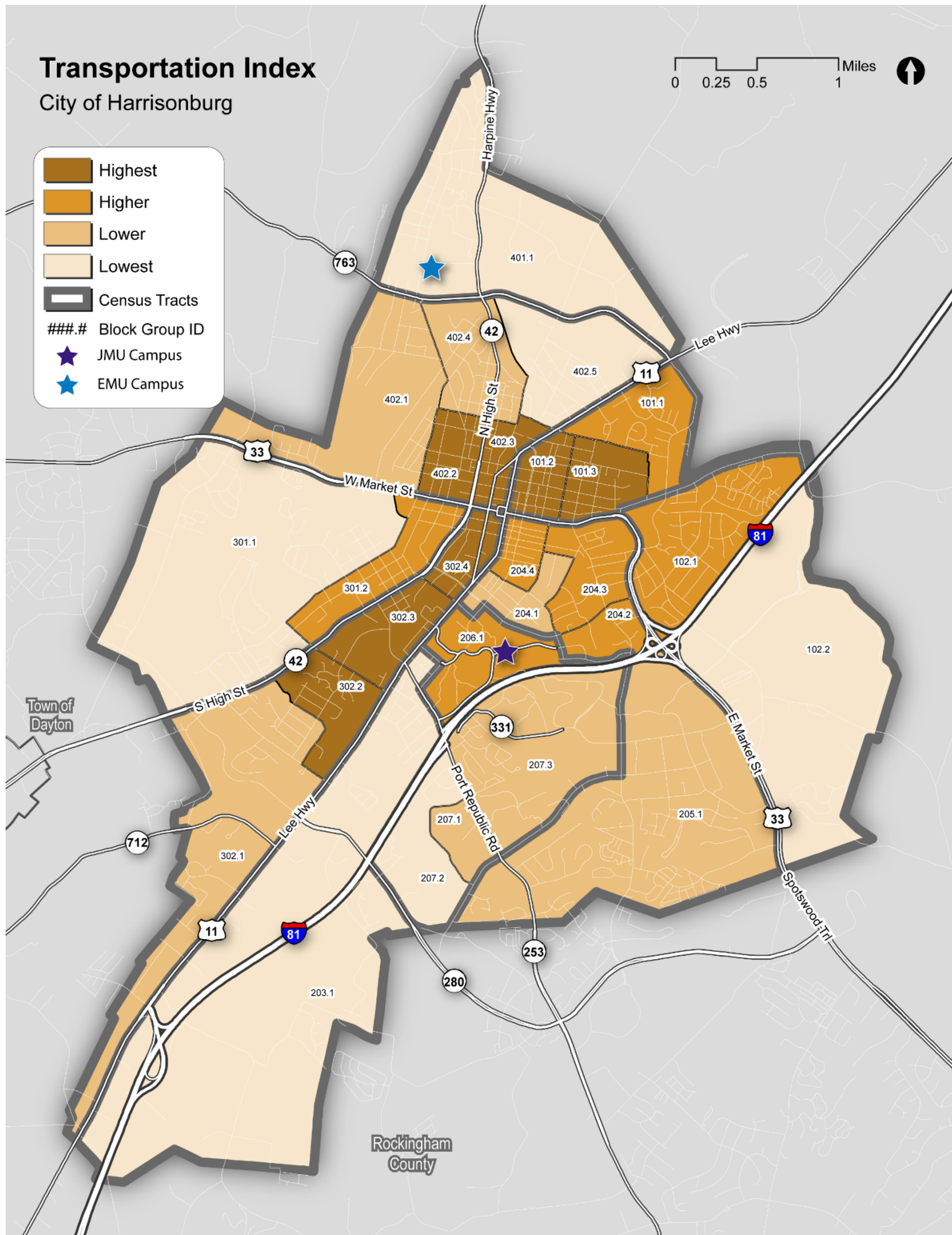
Areas with the highest levels of jobs proximity are found near the City-center, corresponding with the Market Street commercial districts and between Harpine Highway/High Street and Lee Highway. These areas tended to have higher levels of education and wealth and lower unemployment rates. In addition, census tracts between Lee Highway and State Route 81, from the City boundary in the north to Port Republic Road in the south, have higher job proximity scores. Notably, R/ECAPs correspond with higher index scores.

Transportation Index

The Transportation Index is a measure of the percentage of the land area of each block group that is within a 1/4-mile buffer of any City bus stop and is used as a way to measure access to public transit. A quarter mile was chosen because this is the accepted distance that most people are willing to walk to access public transit. Block groups with a greater proportion of area that is located within a buffer score higher on this index. Block groups were not awarded more points by having multiple bus stops for which the buffers overlap largely because there are few (four) transfer stops so having access to a different bus stop on the same bus route is not an appreciable benefit. The data was mapped by quartile and indicate areas of highest, higher, lower, and lowest access by block group.

Harrisonburg has the best access to public transit closest to the City-center with the lowest transportation scores corresponding with the urban fringe.

Map 24: Transportation Index



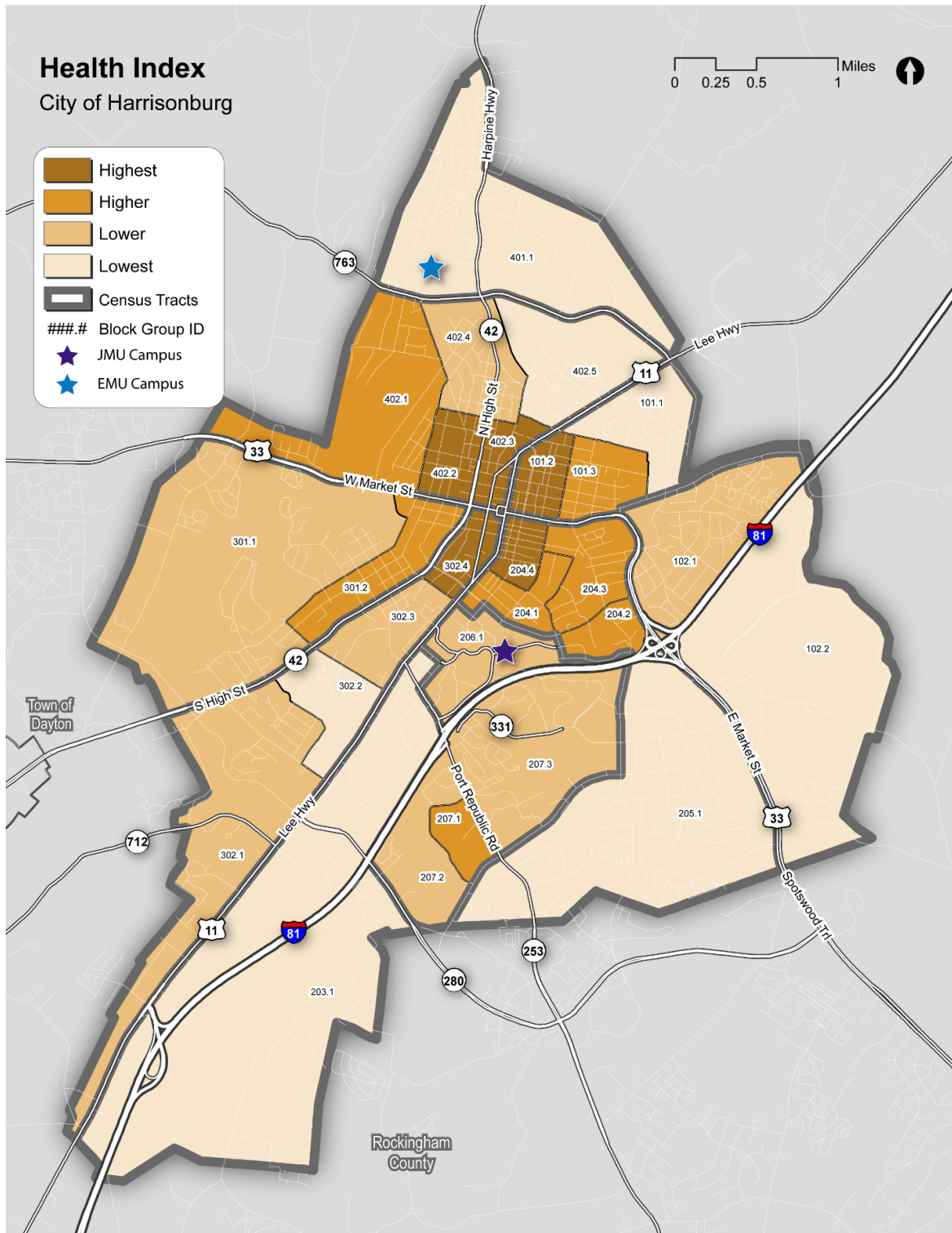
Source: City of Harrisonburg; Calculations by Mullin & Lonergan Associates, Inc. and EPR-PC

Health Index

The Health Index is comprised of several components. A one-mile buffer was placed around all parks, sports facilities, community centers and a ½-mile buffer around full-service grocery stores that would provide access to fresh foods. In addition, one-mile buffers were placed around the EMU campus and all public elementary/middle schools because these campuses are utilized by the community as parks; residents ride bikes, use playground equipment and fields for recreation. These buffer distances were chosen because they are accepted distances that people are willing to walk to access these types of amenities. Like the transit score, the percentage of the block group's area that is located within the buffer was calculated. However, because there are appreciable benefits to having access to more than one park or grocery store or a park and a recreation center, the percentage of each block group's area that was within zero to seven buffers was calculated. Areas with greater access to more amenities score higher in each of the categories. The scores for parks, sports facilities and community centers accounted for half of the overall Health Score and access to fresh foods via full-service grocery stores accounted for the balance of the score. The data for parks and recreation facilities was provided by the City of Harrisonburg while the grocery store data was pulled from PolicyMap. The data was mapped by quartile and indicate areas of highest, higher, lower, and lowest access by block group.

In general, areas along Harrisonburg's periphery tended to have lower Health Index scores with scores increasing for those block groups closer to the City-center.

Map 25: Health Index

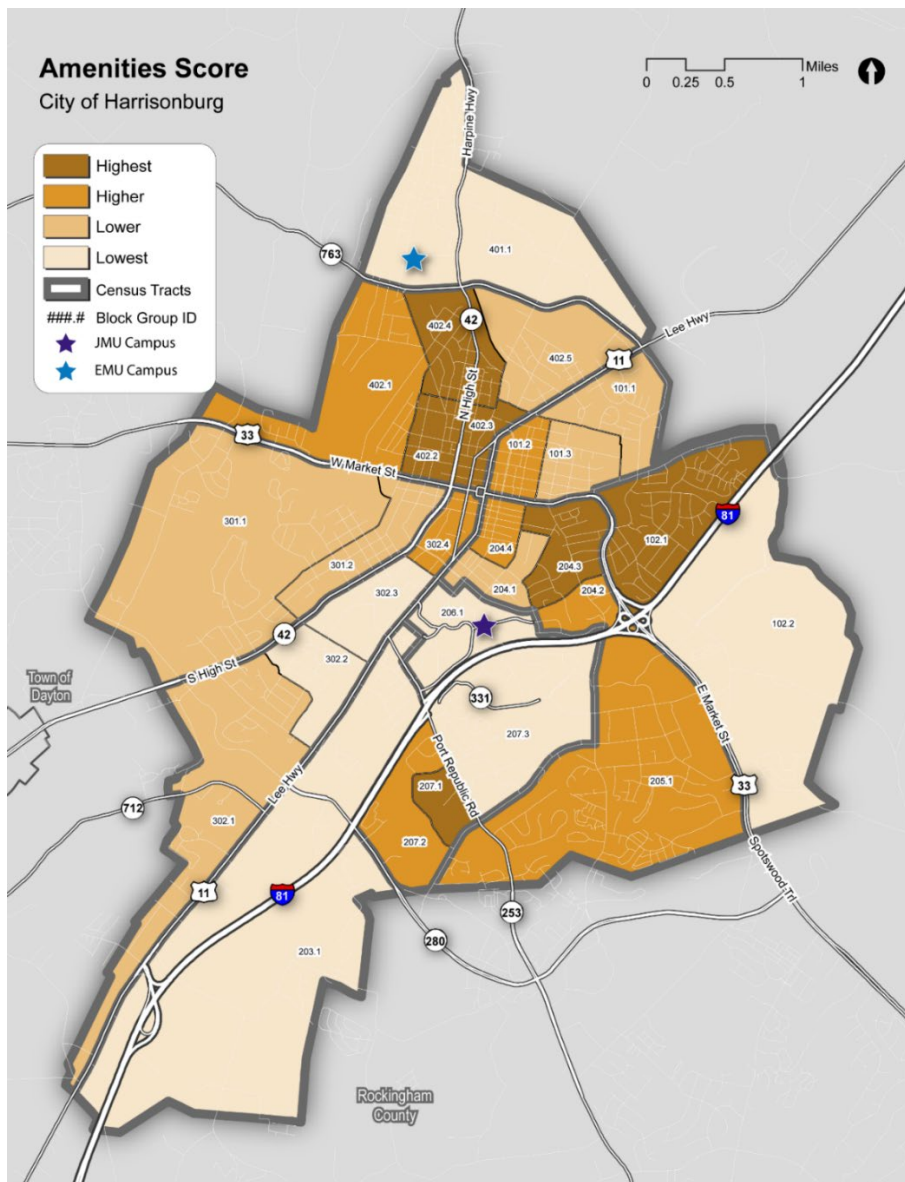


Source: City of Harrisonburg and PolicyMap; Calculations by Mullin & Lonergan Associates, Inc. and EPR-PC

Access to Amenities Composite Index

Each of the four component indices – Education, Jobs Proximity, Transit Access and Health – were weighted equally to determine an Access to Amenities composite score for each block group. The resulting score was mapped by quartile and indicate areas of highest, higher, lower, and lowest access by block group. Higher and highest level access scores were located in block groups along the intersection of West Market Street with North High Street and Lee Highway in the northwest, and along the intersection of East Market Street with Lee Highway and State Route 81 to the southeast. Notably, designated R/ECAPs had higher composite scores with the exception of Census Tract 3.02 (BG 3).

Map 26: Amenities Access Composite Score



Source: Great Schools, City of Harrisonburg, PolicyMap, LEHD

Evaluation of the City's Current Fair Housing Legal Status

Harrisonburg residents can receive fair housing services from the Virginia Fair Housing Office, HUD, and a variety of local and regional agencies and organizations. This section summarizes fair housing statutes and organizations and analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made.

Fair Housing Statutes

Federal Statutes

Several federal statutes protect people from housing discrimination or from being denied participation in federally funded programs. These include:

- The federal **Fair Housing Act** protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.
- Title VI of the **Civil Rights Act** of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Title VI applies to programs or activities receiving federal financial assistance from HUD.
- Section 504 of the **Rehabilitation Act** of 1973 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. Titles II and III of the Americans with Disabilities Act prohibit discrimination on the basis of disability in all programs, services, and activities of public entities and by private entities that own, operate, or lease places of public accommodation.
- Title I of Section 109 of the **Housing and Community Development Act** of 1974 prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grant (CDBG) programs or activities.

State Statute

Virginia's Fair Housing Law, as amended, makes it unlawful to discriminate against any person in housing or housing related services because of race, color, religion, sex (including sexual orientation and gender identity), national origin, handicap or disability, or familial status. The State also prohibits discrimination due to elderliness (ages 55 and older), source of income, or military status.

Fair Housing Entities

U.S. Department of Housing & Urban Development

The Office of Fair Housing & Equal Opportunity (FHEO) of HUD administers federal laws and establishes national policies to ensure that all Americans have equal access to the housing of their choice. Housing discrimination complaints filed with HUD may be referred to the Pennsylvania Human Relations Commission for investigation.

Virginia Fair Housing Office (VFHO)

The Fair Housing Office, part of Virginia's Department of Professional and Occupational Regulation, is a "substantially equivalent agency" under HUD's Fair Housing Assistance Program (FHAP). This means that VFHO has been certified as substantially equivalent after HUD determined that it administers a law (i.e., Virginia's Fair Housing Law) which provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD refers complaints of housing discrimination that it receives from Harrisonburg residents to VFHO for investigation.

As a FHAP agency, the VFHO receives grant funding from HUD to assist in the enforcement of the federal Fair Housing Act. The VFHO also receives some financial and operational assistance from FHEO to enforce the State Fair Housing Act.

Housing Opportunities Made Equal, Inc.

Housing Opportunities Made Equal (HOME), Inc. is a non-profit, HUD-approved housing counseling organization based in Virginia. HOME, Inc. conducts fair housing enforcement, research, outreach, and policy work state-wide. In addition, this organization offers housing counseling and education workshops.

Blue Ridge Legal Services

Blue Ridge Legal Services is a non-profit, legal aid society that provides free civil legal assistances to low-income residents of Shenandoah and Roanoke Valleys, including the City of Harrisonburg. Legal assistance varies depending upon the needs of the client, the type of case, and available resources. However, Blue Ridge most commonly provides legal assistance regarding landlord tenant disputes and government benefit eligibility.

Existence of Housing Discrimination 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 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.

Complaints to HUD and/or VFHO

Complaint data was requested from HUD on August 21, 2021. This data has not yet been received.

Public Sector Policy Review

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, national origin, elderliness, military status, or source of funds 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, national origin, elderliness, military status, or source of funds. 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, national origin, elderliness, military status, or source of funds 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 the City of Harrisonburg to determine opportunities for furthering the expansion of fair housing choice.

CDBG Program

Harrisonburg allocates funding to specifically address fair housing issues.

Harrisonburg's CDBG Program is under the authority of the Community Planning and Development (CPD) division of the U.S. Department of Housing & Urban Development (HUD). Each year the City develops an Annual Action Plan to identify the eligible activities it will fund and implement with HUD CPD funds. The City manages its CDBG allocation within the City Manager's Office, which, as the lead entity/agency, is responsible for the implementation of the Annual Action Plan.

This section analyzes the local policies in place that guide how Harrisonburg affirmatively furthers fair housing as part of funding decisions through the Annual Action Plan process.

Funding Priorities

Examining the amount of total annual allocations spent specifically on fair housing provides insight into how communities prioritize their commitment to affirmatively further fair housing. Such activities include fair housing planning, preparing an Analysis of Impediments to Fair Housing Choice, providing fair housing education and outreach for staff, sub-recipients, and the general public, and using techniques like paired testing in the private rental market.

In FY2020-2021, the City budgeted CDBG funds in the amount of \$140,000 to the Harrisonburg Redevelopment and Housing Authority (HRHA) to affirmatively further fair housing through the rehabilitation of 40 units in the Harrison Heights public housing complex. In terms of paired testing, the City has been in communication with the Piedmont Housing Authority to schedule fair housing discrimination testing for both race and disability in Harrisonburg's rental housing. The City also completed a comprehensive, city-wide housing assessment and market study to further the understanding of Harrisonburg's affordable housing needs. In addition, the City will continue to invest its CDBG dollars in the HRHA First Time Homebuyer Program, which aids in promoting affordable housing

through closing cost assistance to advance homeownership and housing of LMI families. Unfortunately, due to COVID-19 requiring redirection of staff resources both at the City Manager’s Office and the Housing Authority, 2020 and 2021 resources were not invested in fair housing education and outreach. However, City staff continued to disseminate educational materials regarding fair housing choice.

Project Selection and Monitoring

Entitlements can ensure that sub-recipients affirmatively further fair housing by requiring and enforcing compliance with fair housing statutes through sub-recipient agreements. City Manager’s Office staff evaluate sub-recipients’ programmatic and fiscal management policies utilizing the HUD Monitoring Desk Guide and conduct annual on-site monitoring of CDBG sub-recipients. Once awarded, Harrisonburg requires subrecipients to submit an action plan with measurable objectives to be achieved. Additionally, sub-recipients are required to provide quarterly reports on their achievement of contractual objectives. As part of monitoring, the City reviews subrecipient budgets and financials to ensure matching sources of funds are accurately budgeted, expended, and accounted for.

Comprehensive Plan

Title 15.2, Chapter 22 of the Virginia Code outlines the comprehensive plan requirements that every governing body must follow “to encourage localities to improve the public health, safety, convenience, and welfare of their citizens and to plan for the future development of communities.” All comprehensive plans must include general development recommendations, a transportation plan, and an affordable housing component. HUD entitlements are also required to include a housing element in their comprehensive plan but may substitute their Consolidated Plan to meet this obligation.³⁵

The City’s Comprehensive Plan, adopted in 2018, establishes 18 goals for Harrisonburg’s future. These goals have been combined based on development topic and are summarized below:

- Implementation measures to keep the Comprehensive Plan vital and useful over the next decade
- Community engagement and collaboration to meet the goals of the Comprehensive Plan
- Land use and development quality guidelines and improvements
- Strengthen existing neighborhoods and promote the development of new neighborhoods
- Provide support for education, workforce development, and lifelong learning
- Preserve historic resources and offer a wide and equitably distributed range of art and cultural opportunities
- Support stewardship of the natural world and enable sustainable development

³⁵ Commonwealth of Virginia. (2022). *Code of Virginia, Title 15.2-2223: Comprehensive plan to be prepared and adopted; scope and purpose*. Accessed at <https://law.lis.virginia.gov/vacode/title15.2/chapter22/section15.2-2223/>

- Enhance Harrisonburg’s parks and recreation facilities and provide programs that support community mental and physical well-being
- Develop and maintain a safe and convenient transportation system serving all modes of travel, while increasing opportunities for alternative modes of transportation (such as walking, bicycling, public transportation, and ridesharing)
- Offer community facilities, infrastructure, and services that are accessible, equitable, efficient, environmentally friendly, and promote sustainable growth
- Revitalize existing residential and commercial areas

A set of objectives with associated implementation strategies accompany each goal within Harrisonburg’s Comprehensive Plan, a number of which have a positive effect on housing choice and access to opportunity. These strategies are listed below:

- To establish procedures for including residents in planning and plan implementation and to consider creating a City Council appointed advisory committee for community engagement (Strategy 3.1.3).
- To undertake initiatives that promote the accessibility of services to all residents taking into account the multilingual needs of the community and exploring common barriers to access for City and community services (Strategy 3.1.4).
- To create corridor plans and consider corridor overlay districts to address issues such as land use and design quality; streetscape improvements; vehicle, pedestrian, and bicycle circulation; access management; development, redevelopment, and reuse opportunities; conservation of special features; improving utilities and public facilities; and signage (Strategy 4.1.4).
- To promote the development of mixed residential and mixed-use areas as recommended in the Land Use Guide (Strategy 4.2.1).
- To develop a zoning approach to provide incentives for the development of residential neighborhoods with a mix of housing types and lot sizes as identified in the Land Use Guide. Amendments to the Zoning Ordinance could encourage innovative residential building types and allow creative subdivision design solutions that promote neighborhood cohesiveness, walkability, connected street grids, community green spaces, and protection of historic and environmental resources (Strategy 4.2.2).
- To collaborate with property owners to proactively rezone properties to zoning districts that would allow for and encourage the types of uses as indicated by the Land Use Guide (Strategy 4.2.4).
- To participate in or host workshops, such as those available through the Virginia Cooperative Extension’s Land Use Education Program, the Virginia Chapter of the American Planning Association, and Smart Growth America, in order to increase the knowledge of City staff, elected officials, and community members regarding good land use practices, affordable housing practices, fair housing policies, and how they can be applied in the City (Strategy 4.6.1).
- To implement Fair Housing Goals and Priorities as recommended and prioritized in the Assessment of Fair Housing, which includes expanding housing choice and access to opportunity; increasing home ownership among low-income households and members of protected classes; improving the utility of public transit for low-income and disabled persons; strengthening anti-discrimination, investigation, enforcement, and operations; and increasing

the level of housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public (Strategy 6.1.1).

- To work with the Harrisonburg Redevelopment and Housing Authority (HRHA) and other agencies and organizations to study and define housing affordability at the full range of income levels in the City and the region (Strategy 6.1.2).
- To partner with HRHA and other community housing providers (serving the elderly, disabled, homeless, low-moderate income families, victims of violence, and others) to address community housing needs throughout the region (Strategy 6.1.3).
- To increase the knowledge of City staff, elected officials, and community members on affordable housing policies by partnering with community organizations and agencies to host workshops and create other educational opportunities (Strategy 6.1.4).
- To encourage the development and construction of a variety of housing types provided at a range of densities, types (single-family detached, duplex, townhome, and multi-family), and costs (Strategy 6.1.5).
- To support expansion of the Family Self-Sufficiency and Lease to Homeownership programs of HRHA and other homeownership programs (Strategy 6.2.1).
- To work with private developers, non-profit community housing providers, and rental housing providers to offer home-ownership opportunities for first-time low-moderate income homeowners (e.g., through the U.S. Department of Housing and Urban Development's HOME Investment Partnerships Program, Virginia Housing Development Authority's First Time Homebuyers, and other available housing programs) (Strategy 6.2.2).
- To support quality and affordable public and privately run childcare and education for children under 5 years old (Strategy 7.1.2).
- To provide support for educational programs for workforce development, apprenticeship, training and retraining to meet the demands of business and industry, as well as, improving the skills of individual community members (Strategies 7.3.1-7.3.3).
- To continue to ensure that all new public sidewalks and sidewalk repairs meet the Americans with Disabilities Act (ADA) accessibility standards, as required, and to promote private development projects connecting to sidewalks to also meet ADA accessibility standards (Strategy 13.1.6).
- To evaluate local and regional public transportation routes through the Transit Development Plan to provide better access to health care and support services (Strategy 15.6.3).
- To create a well-prepared and successful workforce by providing educational programs for workforce development, training, apprenticeship, and retraining to meet demands of business and industry (Strategies 16.3.1 – 16.3.6).

With the approval of the 2018 Comprehensive Plan, the entire City of Harrisonburg was designated as an Urban Development Area (UDA). This means that the City is sufficient to accommodate 10-20 years of projected growth via redevelopment or infill development (to the extent feasible) and must allow Traditional Neighborhood Development principals in its zoning ordinance. Generally, the City's comprehensive plan and UDA status promote a range of housing densities and types and support mixed

use developments, providing for greater housing choice and access to opportunity.³⁶

Zoning Risk Assessment

Local zoning ordinances are an important tool that communities can use to regulate land use and guide development. Given that zoning ordinances govern the location and characteristics of various land uses, they have the potential to limit or expand fair housing choice. Many common fair housing zoning issues are interrelated with affordable housing issues. Because members of the protected classes are disproportionately affected by a lack of affordable housing, zoning that effectively restricts affordable housing development can be an impediment to fair housing choice as well.

The following evaluation of Harrisonburg’s zoning code has been incorporated from the 2021 Comprehensive Housing Assessment and Market Study. In July 2020, the City of Harrisonburg contracted with Kendig Keast Collaborative to update the City’s zoning and subdivision ordinances. A draft of the revised zoning ordinance is anticipated in 2023, guided by the objectives to local affordable housing goals identified herein.

Policy Framework

The City’s 2018 Comprehensive Plan was utilized as a policy framework to review the current zoning code. In the housing element of the plan, Goal 6 established a policy for affordable housing with three corresponding objectives:

- Goal 6: To meet the current and future needs of residents for affordable housing.
 - Objective 6.1 To promote affordable housing options, including affordable rental properties and affordable homes for ownership.
 - Objective 6.2 To promote home ownership to increase the proportion of owner-occupied units in the City.
 - Objective 6.3 To support programs that prevent and address homelessness in the City.

While none of the Comprehensive Plan’s nine affordable housing strategies refer to the zoning code or regulations, this analysis focused on affordable housing options and potential obstacles to the above-referenced objectives.

Zoning Definitions

Sec. 10-3-24 of the local code defines uses and terms for the zoning ordinance. This section lists approximately thirteen residential uses. Several uses are defined but not listed under the district sections. For example, Sec. 10-3-24 defines “accessory living unit,” which is not explicitly listed under any residential zone. The code defines “group housing project” but the definition is not explicitly consistent with the state code. There is ambiguity in the local zoning code about allowing group housing.

³⁶ Commonwealth of Virginia. (2022). *Code of Virginia, Title 15.2-2223.1: Comprehensive plan to include urban development areas*. Accessed at <https://law.lis.virginia.gov/vacode/15.2-2223.1/>

Under the zoning district code sections, there are uses listed, such as “single-family, attached” that are not defined in Sec. 10-3-24. The definitions section should also address “temporary family health care structure” per 15.2-2292.1 of the state code.

Zoning Districts Sections

The City created seventeen base zoning districts under its existing code. Fourteen districts are residential. The following zoning use matrix of districts and residential uses defined in the zoning code highlights how each zoning district regulates residential uses defined in Sec. 10-3-24. In the matrix:

- B represents “by-right use”
- S represents “special use permit”
- Blank spaces indicate uses that are not permitted under that zoning district.

Table 19: Zoning Residential Use

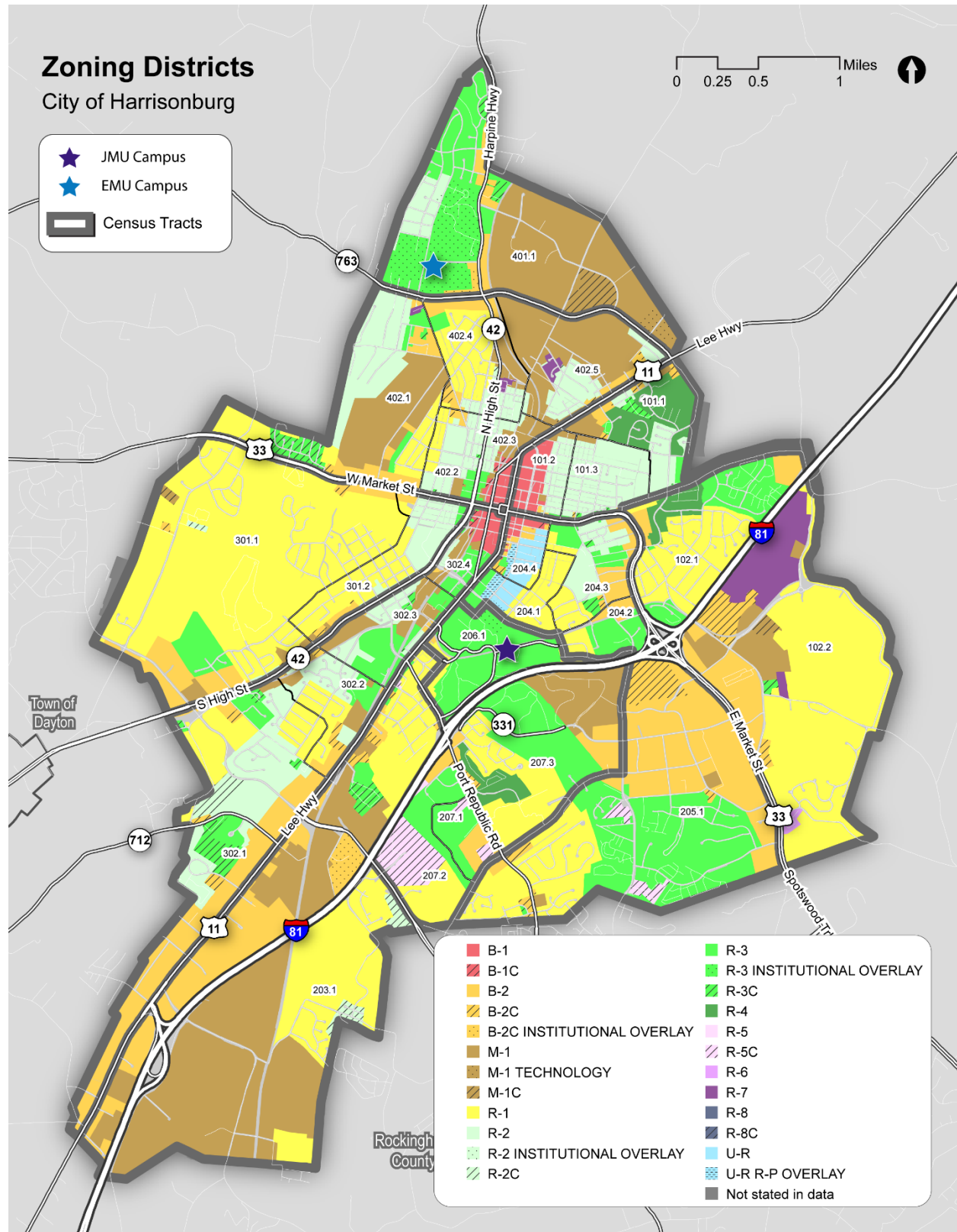
Zoning District	Accessory Living Unit	Boardinghouse	Dwelling, Single-Family	Dwelling, Duplex	Dwelling, multiple-family	Dwelling, Quadraplex	Dwelling, Townhouse	Group Housing Project*	Manufactured Home	Manufactured Home Park	Nursing Home	Short-Term Rental**
R-1 Single-Family Residential District.			B									S
R-2 Residential District.			B	B								S
R-3 Multiple-Dwelling Residential District.		S	B	B	B	B					B	S
R-3 Medium Density Residential District.		S	B	B	S		B				B	S
R-4 Planned Unit Residential District.			B	B								
R-5 High Density Residential District.					B/S		B					
R-6 Low Density Mixed Residential Planned Community District.			B									
R-7 Medium Density Mixed Residential Planned Community District.			B		B		B					S
R-8 Small Lot Residential District			B	B			S					S
MX-U Mixed Use Planned Community District.			B	B	B		B					
MH-1 Manufactured Home Park District.									B	B		
MH-2 Manufactured Home Subdivision District.									B	B		
B-1A Local Business District.												
B-1 Central Business District.			B	B	B	B	B					
B-2 General Business District.												
M-1 General Industrial District.			S									
I-1 Institutional Overlay District.												
U-R Urban Residential District.			B	B								S

**Note: The Planning Commission approves Group Housing Projects*

***Note: Short-term rentals are permitted by special use permit in R-1, R-2, R-3 (multiple), R-3 (medium), R-4, R-5, R-6, R-7, R-8, MX-U, B-1, and U-R). For local zoning terminology, know that we have a "short-term rental" use and a "homestay" use with similarities and differences.*

Despite fourteen residential-related districts, the primary allowable use is “dwelling, single-family.” Several districts allow for duplexes, townhomes, and multi-family. A review of the zoning map reveals that most applied zoning districts limit housing options. Other critical uses are not allowed in the district sections of the code.

Map 27: Harrisonburg Zoning Map



Harrisonburg has a very limited supply of residentially zoned properties that allow for a higher intensity of housing densities and types. Under current zoning, nearly 20% of the City falls under industrial zoning. About 40% of the City's land mass is zoned for single-family detached homes. The City prohibits multi-family development for over 80% of the jurisdictional area. Zoning map amendments can create an additional supply of higher-density residential zoning, which would allow for more affordable units. Zoning map changes can also bring greater consistency between existing land uses and zoning.

Accessory dwelling units

Accessory dwelling units (ADU), also called granny flats, are essential for supplying affordable units and supplementing rental income to those struggling to afford their existing home. Under the current code, the City does not allow for ADUs in any residential zone. While rental spaces are allowable, separate kitchens are not. Accessory units are standard tools that can increase housing supply while maintaining the existing community character.

Group Housing

The residential districts are not explicit in how they regulate group homes. Under the state code, Sec. 15.2-2291 states that "Zoning ordinances for all purposes shall consider a residential facility in which no more than eight individuals with mental illness, intellectual disability, or developmental disabilities reside, with one or more resident or nonresident staff persons, as residential occupancy by a single family. For the purposes of this subsection, mental illness and developmental disability shall not include current illegal use of or addiction to a controlled substance as defined in § 54.1-3401. No conditions more restrictive than those imposed on residences occupied by persons related by blood, marriage, or adoption shall be imposed on such facility." Harrisonburg's existing code could be more explicit with how it allows for this use, which is defined under boardinghouse, as opposed to group housing project. More clarity could confirm conformity with Sec. 15.2-2291 of the Virginia Code.

Families

Under several residential districts, the code states that "Dwelling units may be occupied by a family or not more than four (4) persons, except that building regulations may supersede such occupancy." Other residential districts limit occupancy to no more than two persons. The code does not exempt those with disabilities, which would be inconsistent with the Fair Housing Act. These provisions are intended to help regulate student housing issues but they also restrict housing options for non-students.

Affordable Dwelling Unit Ordinance

The existing zoning code does not include provisions for affordable housing units. There are regulatory obstacles on the state level that limits what the City can enact. Due to Dillon's Rule, the City cannot enact an affordable dwelling unit ordinance without special permission from the Virginia General Assembly. Sec. 15.2-2304 of the State Code says that the governing body "may by amendment to the zoning ordinances of such locality provide for an affordable housing dwelling unit program. The program shall address housing needs, promote a full range of housing choices, and encourage the construction and continued existence of moderately priced housing by providing for optional increases in density in order to reduce land costs for such moderately priced housing. Any project that is subject to an

affordable housing dwelling unit program adopted pursuant to this section shall not be subject to an additional requirement outside of such program to contribute to a county or city housing fund.” Localities granted this authority include the Counties of Albemarle and Loudoun, and the Cities of Alexandria, Charlottesville, and Fairfax.

Not in My Back Yard (NIMBY)

Public opposition to change in the status quo can be common. NIMBYism describes public opposition or an unwillingness to accept something considered undesirable in a neighborhood or community. This can include a new zoning ordinance, higher density housing, large multi-family development, the creation of housing for people with disabilities or supportive housing, or the development of a long-vacant parcel by surrounding landowners. However, in many instances, the potential benefit resulting from proposed change can make it imperative that a public education campaign may be necessary to allay fear, inform with facts, address negative impact and answer questions.

Stakeholders identified this issue not only in locating housing for populations they serve, but also in the creation of housing for special needs populations. This public opposition is often time consuming and has stopped projects from being built.

Anti-Displacement Plan and Relocation Plan

Anti-displacement and Relocation Plans serve to advance the interests of lower-income individuals and households at risk of displacement due to neighborhood changes in various sectors, such as housing, businesses, and infrastructure. As a recipient of CDBG funds, the City of Harrisonburg has a residential anti-displacement and relocation assistance plan in place for 2022 demolition and acquisition activities. The plan is compliant with HUD regulation 24 CFR § 42 and 24 CFR § 570 outlining plans and strategies for addressing displacement.

The plan makes clear that the City will identify the reasonable steps to minimize the displacement of persons from their homes as a result of an assisted project. Written Notice of Relocation will be provided, though the plan does not specify the method of delivery (e.g., certified mail or hand delivered). The Plan does not include how the terms of the relocation assistance will be discussed or any information to be made available to investor-owners, owner-occupants, and tenant households in the redevelopment area.

In accordance with 24 CFR § 42.350, relocation assistance for eligible individuals and households are limited to moving expenses, homeowner replacement housing payment, or tenant replacement housing payment in the form of rental assistance or down payment assistance. Comparable replacement dwellings are not clearly defined regarding environmental conditions and location in respect to public services, utilities, and place of employment. All low/moderate-income dwellings that are converted or demolished will be replaced and displaced households will be appropriately relocated. All replacement housing units will maintain an affordability period of no fewer than ten years from initial occupancy and comply with CDBG guidelines.

Any person who believes he/she has been displaced for a federally assisted project may file a written appeal with the City. If the displaced person is not in agreement with the City's determination, he/she/they may file a written request for review of the City's decision with the HUD Field Office. The Plan does not clearly outline the appropriate appeal procedures related to eligibility for assistance due to displacement, nor does it include contacts for complaints and appeals.

Language Access Plan

To improve public safety, health, convenience, comfort, and general welfare of all residents, a language access plan is necessary for individuals who are non-English speaking or have limited English proficiency (LEP) to access available services. Procedures for providing language assistance to LEP residents were analyzed for the City's Language Access Plan, effective May 2018.

The plan details the four-factor analysis, indicating that the LEP Spanish-speaking population meets the safe harbor threshold (5% of the population or 1,000 people). The City interviewed CDBG staff who reported having zero contacts with Limited English Individuals within the previous five years (2013-2017). There were no instances where services were required during this period, and only one request to translate the Application for Assistance Form into Spanish. This form was developed and circulated by City staff to benefit subrecipients performing intakes in their respective programs.

As the LAP develops through monitoring and documentation of contact with LEP persons, the plan can be further refined. The City intends to further develop the LAP.

Private Sector Policy Review

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing and advertising of real estate, for example. In this section of the AI, mortgage lending practices and high-cost lending are analyzed.

Home Mortgage Lending

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 HMDA data available for Harrisonburg is from 2018 to 2020. 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 focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

The most recent HMDA data available for Harrisonburg is from 2018 to 2020. 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 focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

Home mortgage data indicates that racial and ethnic minority applicants faced higher denial rates and lower origination rates (approvals) than White applicants.

Denial rates for Blacks and Hispanics were 20.3% and 17.7%, respectively, compared to a 13.0% denial rate for Whites. The overall denial rate in Harrisonburg was 12.0%. (Analysis of other races is not included due to small sample size.)

Table 19: Harrisonburg Home Mortgage Data, 2018-2020

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	7,299	45.0%	4,369	59.9%	172	2.4%	464	6.4%	716	9.8%
Home Improvement	799	4.9%	436	54.6%	32	4.0%	235	29.4%	88	11.0%
Refinancing	6,810	42.0%	3,780	55.5%	153	2.2%	869	12.8%	1,186	17.4%
Other Purpose/Not Applicable	1,325	8.2%	598	45.1%	54	4.1%	383	28.9%	123	9.3%
Loan Type										
Conventional	12,809	78.9%	7,552	59.0%	342	2.7%	1,607	12.5%	1,564	12.2%
FHA	1,736	10.7%	764	44.0%	37	2.1%	212	12.2%	299	17.2%
VA	987	6.1%	521	52.8%	16	1.6%	97	9.8%	208	21.1%
FSA/RHS	701	4.3%	346	49.4%	16	2.3%	35	5.0%	42	6.0%
Property Type										
One to four-family unit	15,769	97.1%	8,980	56.9%	394	2.5%	1,842	11.7%	2,004	12.7%
Manufactured housing unit	402	2.5%	149	37.1%	16	4.0%	107	26.6%	104	25.9%
Multifamily	62	0.4%	54	87.1%	1	1.6%	2	3.2%	5	8.1%
Applicant Race										
American Indian/Alaska Native	46	0.3%	26	56.5%	1	2.2%	9	19.6%	9	19.6%
Asian	389	2.4%	221	56.8%	11	2.8%	71	18.3%	56	14.4%
Black/African American	384	2.4%	209	54.4%	14	3.6%	78	20.3%	62	16.1%
Native Hawaiian/Two or more races	18	0.1%	9	50.0%	1	5.6%	3	16.7%	5	27.8%
White	12,091	74.5%	7,713	63.8%	335	2.8%	1,569	13.0%	1,673	13.8%
Not available	3,303	20.3%	1,005	30.4%	49	1.5%	221	6.7%	308	9.3%
Hispanic*	1,052	6.5%	585	55.6%	29	2.8%	186	17.7%	127	12.1%
Total	16,233	100%	9,183	56.6%	411	2.5%	1,951	12.0%	2,113	13.0%

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures. *Hispanic ethnicity is counted independently of race.

Source: Consumer Financial Protection Bureau, 2018-2020 HMDA

High-Cost Lending Practices

The widespread housing finance market crisis of 2007-2009 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, increased the availability of credit to low-income persons. At the same time, subprime lending 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 (HMDA) 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.

For this analysis, lower-income households include those with incomes between 0% and 80% of median family income (MFI), while upper-income households include those with incomes above 80% MFI. Information was provided in HMDA for only 13 high-cost originated loans, and 5,679 loans were marked as ‘NA’. The very small sample size made an analysis of high-cost lending for this period statistically insignificant. This could be an issue with the HMDA dataset; however, it is more likely that lenders are not reporting the information needed to calculate the rate-spread for mortgage loans.

Impediments to Fair Housing Choice

Several impediments to fair housing choice that were identified in the 2016 AFH remain as impediments today. These are being carried over because they are still relevant today. Based on these impediments, a Fair Housing Action Plan with recommendations to be undertaken by the City over the next five years was developed and is described in the final section of this analysis.

Impediment: Consistent with the 2016 AFH, a lack of affordable, accessible housing within high opportunity areas remains a barrier that disproportionately affects members of the protected classes.

- Finding affordable housing near essential services is a significant barrier faced by persons with disabilities. Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities, especially if they are transit-dependent.
- Seniors (aged 65+) are one of the major drivers of Harrisonburg’s population. Due to the aging population of Harrisonburg, this lack of affordable, accessible housing will become increasingly important in the future.
- According to the 2021 Comprehensive Housing Assessment and Market Study, there is a “housing mismatch” in Harrisonburg, in which thousands of households live in units that do not align with their income. This housing mismatch has a disproportionately greater impact on lower income households.

Goal: *Expand housing choice for members of the protected classes.*

Impediment: Members of the protected classes are more likely to have lower incomes, higher unemployment rates and higher poverty rates. Limited housing choice restricts access to community assets for members of the protected classes.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts, which reduces housing choice.
- Overall, Harrisonburg continues to have low levels of segregation, though there is a continuing trend toward increased segregation across racial and ethnic minority groups.
- Members of the protected classes are more likely to live in R/ECAPs as housing is more affordable.
- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing.
- While fair housing and affordable housing are distinct from each other, there is a link when affordable housing is not located throughout a jurisdiction, including in higher opportunity areas, housing choice is restricted.

Goal: Remove barriers to accessing community assets for members of the protected classes.

Impediment: Fair housing education and outreach efforts are not adequately meeting need.

- Harrisonburg residents can receive fair housing services from several local agencies, including Housing Opportunities Made Equal, Inc. and Blue Ridge Legal services. These groups provide education and outreach, process fair housing complaints, and connect residents with available resources.
- Insufficient resources make affirmatively furthering fair housing through enforcement, investigation, and outreach extremely difficult.

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

Goal: Strengthen fair housing education, investigation, enforcement, and operations.

Impediment: Members of the protected classes are underrepresented among homeowners.

- Homeownership rates in Harrisonburg have maintained consistent levels of around 38% over the last 19 years. However, there are variations in homeownership rates by racial/ethnic group. Black and Hispanic households are under-represented among Harrisonburg homeowners.
- Low homeowner and rental vacancy rates in Harrisonburg indicate high levels of competition within the housing market as residents compete for scarce units, and where the lowest income households have the fewest options.
- Homeownership has historically been a way for a family to create generational wealth, which allows those families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.

Goal: Increase homeownership among low-income households and members of the protected classes.

Fair Housing Action Plan

The Fair Housing Action Plan for the 2022 AI includes a series of goals and recommendations which, if implemented, will work to overcome the impediments to fair housing choice in Harrisonburg. In several instances, the recommendations included in the City’s 2021 Comprehensive Housing Assessment and Market Study have been included in the Fair Housing Action Plan because they specifically address these impediments. In addition, the City is investing a significant amount of resources—human, financial, technical, City assets and others—in implementing the Study’s recommendations.

More details on the recommended strategies in the City’s 2021 Study can be found [here](#).

Goal 1: Expand housing choice for members of the protected classes.	
Impediment to be addressed:	Consistent with the 2016 AFH, a lack of affordable, accessible housing in higher opportunity areas remains a barrier that disproportionately affects members of the protected classes.
Strategy 1.1:	<p><i>Conduct a public campaign about affordable housing and why it contributes to a vibrant community.</i> Educating residents, organizations and businesses is a key element to combating NIMBYism that exists against any change proposed—whether in new zoning or subdivision ordinance provisions, new affordable housing developments, new policies proposed, and new ways of solving current issues. The focus of the campaign should be on why the city cannot afford to neglect affordable housing.</p> <p><i>Potential partners:</i> The campaign can be carried out by a third party resulting from a partnership of public and private entities, such as James Madison University, the Harrisonburg-Rockingham Board of Realtors, the United Way, local lending institutions and others.</p> <p><i>Schedule:</i> 2022</p>
Strategy 1.2:	<p><i>Evaluate City resources to finance affordable housing initiatives.</i> The impending bond for construction of a second high school will limit the borrowing capacity of the City and require a tax increase. As a result, identifying and evaluating how available resources can be re-allocated to affordable housing must be a priority. In addition, the City should anticipate the housing situation will worsen once COVID-19 eviction moratoria end. Resources could include General Fund line items but emphasis should also be placed on proceeds from the sale of City-owned assets and other revenue sources (such as recordation fees) that could be re-evaluated and re-directed for affordable housing effort.</p> <p><i>Schedule:</i> Begin in 2022 then annually thereafter.</p>
Strategy 1.3:	<p><i>Consider waiving fees for affordable housing.</i> Waiving certain fees for affordable housing development may help to offset some of the costs associated with the project. Sec. 15.2-958.4 of the VA State Code states “a locality may by ordinance provide for the waiver of building permit fees and other local fees associated with the construction, renovation, or rehabilitation of housing by a § 501(c)(3) organization with a primary purpose of assisting with the provision of affordable housing.” Many nonprofit affordable housing developers exist on shoe-string budgets. Having building permit fees and water/sewer connection fees waived for</p>

	<p>new affordable housing units can have a significant impact of the cost of the home for a low-income household. The City can also waive building permit and other local fees associated with a private-sector entity that is pursuing an affordable housing development.</p> <p><i>Schedule:</i> 2022</p>
<p>Strategy 1.4:</p>	<p><i>Evaluate policies for providing a 10-year tax abatement for new affordable multi-family projects consisting of more than four units and the adaptive re-use or preservation of formerly vacant or non-residential structures into affordable residential uses for non-student households.</i> Providing a tax abatement is another financial incentive the City can offer to encourage private developers and builders to undertake new affordable rental construction or substantial conversion of larger structures. Cities expect to break even when they grant tax abatements: the amount they forgo in tax revenue from the new development until it is completed should be exceeded by the tax revenue increase caused by the new housing’s economic impact. If lower property taxes keep operating costs lower, then property owners should maintain affordable rents; however, a prohibition against raising rents during the abatement period should be part of the written agreement.</p> <p><i>Schedule:</i> 2022</p>
<p>Strategy 1.5:</p>	<p><i>Develop and propose an Affordable Housing Location Policy.</i> Some communities have adopted Affordable Housing Location Policies with the goal of increasing the supply of affordable housing in underserved locations near employment, transit and commercial centers (such as Market Types A and C in Harrisonburg); in and near downtown areas and neighborhoods with approved revitalization plans; and preventing further concentrations of minority and low-income persons and subsidized housing. To achieve this vision, the policy requires developers to comply with these criteria for any new multi-family rental affordable housing project that is funded, in whole or in part, by the City. Some exceptions are made for rehabilitation and developments exclusively for the elderly and disabled. City funding could be in the form of grants (such as CDBG or HOME) or any incentive provided to the development (such as tax abatement, fee waivers, or provision of infrastructure, among others).</p> <p><i>Schedule:</i> 2022-2023</p>
<p>Strategy 1.6:</p>	<p><i>Identify city-owned assets suitable for affordable and/or mixed-income residential development and issue Requests for Proposals for development proposals.</i> The City owns a valuable commodity that can contribute to expanding its housing inventory: developable land located across the City in all Market Types. This would include the sale of public properties, such as park property, property planned for park designation, excess land retained from past construction projects, and other City-owned parcels. Some of these parcels are small but several are significant in size. For larger parcels, the City should issue RFPs and solicit proposals from private developers and then provide incentives. For example, if a site would require the extension of water and sewer service lines, the cost of these extensions could be deducted from the sale price of the land, thereby providing an incentive to the developer for providing the necessary infrastructure. Another valuable incentive is to ensure each parcel is zoned appropriately so potential developers know they will not need to undertake this step—one that can be</p>

	<p>lengthy and expensive. Even small parcels may be appropriate for several small, moderately priced single-family dwellings made available as affordable sales units for income-eligible homebuyers.</p> <p>For any city-owned parcel transferred in this manner, the period of affordability and the required income eligibility of owners and renters can be ensured through deed restrictions on the property. In addition, potential tenants and homebuyers could be identified through the waiting lists maintained by Harrisonburg Redevelopment & Housing Authority. Sales proceeds from this recommendation should be set aside to capitalize a local Housing Trust Fund.</p> <p><i>Schedule:</i> 2022-2026</p>
<p>Strategy 1.7:</p>	<p><i>Analyze and propose amendments to the Comprehensive Plan and zoning ordinance to include “Missing Middle Housing” strategies.</i> Multi-family development is prohibited in 80% of the City. Single-family dwellings account for 94% of all owner-occupied units. For non-student one-person households, small households and other households in different phases of their lives seeking alternatives to single-family detached dwellings, medium density housing can be the solution. Frequently found in transition areas between single-family neighborhoods and multi-family developments, the missing middle can take the form of a four-unit structure, for example, that is compatible in style and size to surrounding structures. The goal is to maintain similar physical building styles, heights, setbacks, and other physical elements of existing neighborhoods while permitting more housing units.</p> <p><i>Schedule:</i> 2022-2023 (in conjunction with the ongoing zoning ordinance update)</p>
<p>Strategy 1.8:</p>	<p><i>Propose an Accessory Dwelling Unit ordinance.</i> Under the existing zoning code, the City does not permit accessory dwelling units, which are smaller units located on the same lot as a principal residence. ADUs can be garage apartments or detached apartments. Some residential zones allow for a “rental space” for up to two persons but prohibit kitchen facilities to create a second dwelling unit, which limits the use of these spaces as true accessory units where occupants live independently. ADUs allow for additional housing supply without substantially changing the character of neighborhoods. Small one-bedroom or studio apartments are typical ADUs. Many communities permit them only on owner-occupied parcels, which can allay fears of unsupervised student rental housing encroaching into non-student neighborhoods. Similar to Missing Middle Housing, ADUs offer an affordable housing option for adult children, adult family members with disabilities who want to live independently, single parents of adult children who want to live close to family but independently, among others.</p> <p><i>Schedule:</i> 2022-2023 (in conjunction with the ongoing zoning ordinance update)</p>
<p>Strategy 1.9:</p>	<p><i>Continue and expand the preservation of the city’s affordable housing stock.</i> Harrisonburg has a significant stock of units that are affordable to renters and owners (80% of all rental units and 38% of all sales units are affordable for households up to 80% AMI), and which have no public subsidy attached to them. In other words, much of the City’s housing is relatively affordable. As such, it is critical that these units be maintained and preserved. Since many of them are older, they require maintenance and repairs to keep them safe, decent and affordable for future owners and renters. In addition to preserving the non-subsidized housing stock, it is also cost-effective to preserve subsidized units,</p>

	<p>which also require maintenance and rehabilitation after 10-15 years of occupancy. The cost to rehabilitate these units, most of which tend to be multi-family rental developments, is much less than to construct new units.</p> <p>Potential Partners: Harrisonburg Redevelopment & Housing Authority, Habitat for Humanity.</p> <p>Schedule: 2022 then annually thereafter.</p>
<p>Strategy 1.10:</p>	<p><i>Collaborate with builders and developers to create and adopt an Affordable Housing Set-Aside Policy.</i> Harnessing the power of the private market to expand the inventory of affordable housing has become a very successful initiative in numerous cities and counties. In Virginia, local jurisdictions cannot mandate that developers of market-rate housing create affordable housing within their development, but they can offer incentives to developers who are willing to participate. The most common incentive is a density bonus whereby in exchange for including affordable units in their project, developers are provided the benefit of increasing the density of the overall project. The key is to collaborate with developers and builders to determine the number or percentage of additional units that can be built and balance it with the number of lower cost/lower rent units so the developer earns a comparable profit margin. The agreement between the City and developer should include a period of affordability, how affordable sales units are re-sold to other income-eligible buyers, how sellers of affordable units are provided a fair share of the equity in their unit upon sale, and other protective mechanisms to protect the City’s investment and the tenants and homebuyers of each development. For example, the affordable units must be included within the market-rate development and be indistinguishable from the market-rate units. Potential tenants and homebuyers could be identified through the waiting lists maintained by Harrisonburg Redevelopment & Housing Authority. In the near-term, set-aside units should be located in higher amenity areas (Market Types A and C in the City). However, over time as the City potentially creates additional commercial centers, grocery stores, parks and other community amenities, then it would be reasonable to locate set-aside units throughout the City.</p> <p>Potential partner: Harrisonburg Redevelopment & Housing Authority</p> <p>Schedule: 2023-2024</p>
<p>Strategy 1.11:</p>	<p><i>The City should take the steps necessary to establish a Housing Fund by ordinance in accordance with the Code of Virginia, which may fund the production or preservation of affordable housing through, among other things, acquisition, new construction, and rehabilitation or housing supportive services.</i></p> <p>Schedule: 2023-2024</p>
<p>Strategy 1.12:</p>	<p><i>Advocate for Virginia Housing to eliminate the requirement in the state’s Qualified Allocation Plan that municipalities must provide a letter of support in order for Low Income Housing Tax Credit (LIHTC) applications to be approved.</i> The requirement for a letter of local support has the tendency to encourage NIMBYism in communities where affordable housing is needed. However, if a proposed LIHTC residential community meets all local zoning and subdivision requirements, and its only distinguishing characteristics from a market-rate residential development are the source of financing (public dollars) and the target population (lower income families with children, for example), then it is discriminatory to deny local support</p>

	<p>for it. The potential for NIMBYism to kill a much-needed affordable housing development is too high to ignore it.</p> <p><i>Potential partner:</i> Harrisonburg Redevelopment & Housing Authority</p> <p><i>Schedule:</i> 2023-2024</p>
Strategy 1.13:	<p><i>Propose amending the Comprehensive Plan to incorporate the housing policies and analysis included in this study.</i> In the City’s Comprehensive Plan, the housing chapter includes one affordable housing goal: “[t]o meet the current and future needs of residents for affordable housing.” Under this goal, there are three objectives and nine strategies listed. The City should incorporate the Comprehensive Housing Assessment and Market Analysis in the Comprehensive Plan to support the data elements of the housing chapter. Given the Plan’s official nature, these additions should help to support changes to local ordinances, programs, capital budgets, and initiatives. The more extensive analysis will also communicate that affordable housing is a priority for the City of Harrisonburg.</p> <p><i>Schedule:</i> 2022-2023</p>
Strategy 1.14:	<p><i>Revise the City’s CDBG funding application to require applicants to discuss how their proposal (a) addresses the impediments identified in the AI and (b) will contribute to furthering fair housing choice.</i></p> <p><i>Schedule:</i> 2023</p>
Strategy 1.15:	<p><i>Harrisonburg Redevelopment & Housing Authority will continue its campaign to increase landlord participation in its Housing Choice Voucher Program, particularly among landlords with rental units located in higher opportunity areas.</i></p> <p><i>Schedule:</i> 2022 and annually thereafter</p>

Goal 2: Remove barriers to accessing community assets for members of the protected classes.

<p>Impediment to be Addressed:</p>	<p><i>Members of the protected classes are more likely to have lower incomes, higher unemployment rates and higher poverty rates. Limited housing choice restricts access to community assets for members of the protected classes.</i></p>
<p>Strategy 2.1:</p>	<p><i>Launch and amplify collaborative efforts to attract and grow jobs with annual wages above \$40,000 and provide workforce training so residents have the required skills.</i> The cost of living in Harrisonburg is rising faster than wages and incomes. Many residents are earning less than the ALICE survival budget and the City has been losing good paying jobs while gaining jobs that pay lower wages. The growth in low-wage jobs increases the demand for affordable housing but the costs of housing development are rising, requiring even more subsidy to be affordable. Harrisonburg needs an economic and workforce development strategy that promotes the upskilling of residents and connects them to jobs that enable them to thrive, not just survive.</p> <p>Potential partners: Harrisonburg-Rockingham Chamber of Commerce, Harrisonburg Downtown Renaissance, Shenandoah Valley Partnership, Shenandoah Valley Workforce Development Board</p> <p>Schedule: 2022</p>
<p>Schedule 2.2:</p>	<p><i>Continue homebuyer assistance activities for low- and moderate-income homebuyers.</i> For low- and moderate-income households who desire to become homeowners, two critical elements can assist them in achieving this goal: homebuyer counseling and financial management along with down payment and closing cost assistance. In many cases, the monthly costs of homeownership are lower than monthly rent and utilities. There are several funding sources available locally and at the state level for continuing this type of assistance in Harrisonburg. Potential homebuyers living in areas with low access to amenities (Market Types B and D in the City) may want to reside in neighborhoods with higher amenity access (Market Types A and C in the City).</p> <p>Potential partners: Harrisonburg Redevelopment & Housing Authority, Central Valley Habitat for Humanity</p> <p>Schedule: 2022 and annually thereafter</p>
<p>Strategy 2.3:</p>	<p><i>Prioritize public transit coverage over ridership to improve transit access for persons with disabilities and extend access to more lower income individuals seeking employment opportunities in higher opportunity areas of the City.</i></p> <p>Schedule: 2023 and annually thereafter.</p>

Goal 3: Strengthen fair housing outreach, education and enforcement.

Impediment to be addressed:	<i>Fair housing education, outreach and enforcement are not adequately meeting need.</i>
Strategy 3.1:	<p><i>Partner with local entities such as lending institutions, attorneys, realtors, school districts, landlords, etc. to host an annual fair housing community forum.</i> Solicit guest speakers such as attorneys practicing in fair housing law.</p> <p>Potential partners: Blue Ridge Legal Services, HOME in Richmond, local lenders, real estate professionals, civil rights or fair housing attorneys</p> <p>Schedule: 2023 then annually thereafter</p>
Strategy 3.2:	<p><i>Conduct annual or bi-annual fair housing training for City department staff, appointed members of boards and commissions that make housing-related decisions, elected officials and subrecipients of CDBG funding.</i> Turnover in staffing, appointments and elections mean new individuals in decision-making and policy-making positions who may not be aware of the City’s obligation to affirmatively further fair housing, which includes stopping discrimination practices and behavior.</p> <p>Potential partners: Blue Ridge Legal Services, HOME in Richmond, VA</p> <p>Schedule: 2023 and then annually or bi-annually thereafter</p>
Strategy 3.3:	<p><i>Continue the City’s efforts to promote fair housing education to its residents, landlords, property management agents and others.</i> The CDBG office will continue its annual initiatives to provide fair housing education through its website and other avenues as opportunities arise throughout the program year.</p> <p>Potential partners: Harrisonburg Redevelopment & Housing Authority, Blue Ridge Legal Services, HOME in Richmond, VA</p> <p>Schedule: 2022 and annually thereafter</p>

Appendix A: Community Engagement

FAQ SHEET



The City of Harrisonburg invites your participation in the development of its 2022-2026 Consolidated Plan, the 2022 Annual Action Plan, and an Analysis of Impediments to Fair Housing, which identifies fair housing issues and recommends solutions.

WHAT IS THE CONSOLIDATED PLAN?

It is a planning document that identifies the affordable housing and community development needs of the City of Harrisonburg over the next five years.

WHY IS THE CITY PREPARING THIS PLAN?

Annually, the City receives Community Development Block Grant (CDBG) funds from the U.S. Department of Housing & Urban Development (HUD). To continue receiving these funds, the City is required to identify and prioritize its needs, then explain how it will address these needs through local projects.

WHAT TYPES OF PROJECTS HAS THE CITY USED THESE FUNDS FOR IN THE PAST?

In Program Year 2019, the City allocated CDBG funding to the S. Dogwood Sidewalk Project, the Park Accessibility Project, and the Kelley Street Waterline Project. The City continued to provide \$140,000 to the Harrisonburg Redevelopment & Housing Authority for debt servicing of the Harrison Heights housing development that provided 40 units for low- and moderate-income (LMI) residents. Funding was also provided to five organizations with the goal to provide public services to LMI residents: VPAS Meals on Wheels, The Suitcase Clinic, The Arc, Pleasant View, and The CASA Child Advocacy Program.

WHO BENEFITS FROM THESE PROJECTS?

Individuals and households can qualify by their income. For example, the total income for a household of four persons must be below 80% of area median income for the household to qualify for one of the projects or programs offered.

HOW CAN I PARTICIPATE IN THIS PROCESS?

There are several ways you can provide input. These are listed on the back of this sheet.

WHO CAN I CONTACT FOR MORE INFORMATION?

You can contact the CDBG Coordinator at cdbg@harrisonburgva.gov, or at (540)432-8926 to leave a message.

ONLINE SURVEY

Take our survey at [SurveyMonkey.com/r/6TRZYRW](https://www.surveymonkey.com/r/6TRZYRW) by October 31, 2021.

Realice nuestra encuesta antes del 31 de octubre de 2021 [SurveyMonkey.com/r/6CGVFDS](https://www.surveymonkey.com/r/6CGVFDS)

PUBLIC MEETINGS

Attend one of the following public meetings:

January 11, 2022 7:00 P.M.

Attend in person: Council Chambers - 409 South Main Street or

Watch the meeting live: Public Education Government Channel 3 or online at

<https://harrisonburg-va.legistar.com/Calendar.aspx>

Comment call in number: 540-437-2687

March 22, 2022 7:00 P.M.

Attend in person: Council Chambers - 409 South Main Street or

Watch the meeting live: Public Education Government Channel 3 or online at

<https://harrisonburg-va.legistar.com/Calendar.aspx>

Comment call in number: 540-437-2687

The City of Harrisonburg provides its programs and services in a nondiscriminatory manner and is an Equal Opportunity Employer. The City also encourages minority and women-owned businesses to submit bids and proposals for CDBG Program and HOME Program contracts. For further information and for language translation services, contact the Grants and Compliance Officer at (540) 432-7701.



HOJA DE PREGUNTAS FRECUENTES



La ciudad de Harrisonburg invita a su participación en el desarrollo de su Plan Consolidado 2022-2026, el Plan de Acción Anual 2022 y un Análisis de Impedimentos a la Vivienda Justa, que identifica problemas de vivienda justa y recomienda soluciones.

¿QUÉ ES EL PLAN CONSOLIDADO?

Es un documento de planificación que identifica las necesidades de vivienda asequible y desarrollo comunitario de la ciudad de Harrisonburg durante los próximos cinco años.

¿POR QUÉ LA CIUDAD ESTÁ PREPARANDO ESTE PLAN?

Anualmente, la Ciudad recibe fondos de la Subvención en Bloque de Desarrollo Comunitario (CDBG, por sus, por sus— y de la Asociación de Inversión en Vivienda (HOME, por sus," del Departamento de Vivienda y Desarrollo Urbano (HUD, por sus, e-Naciones Unidas). Para seguir recibiendo estos fondos, la Ciudad debe identificar y priorizar sus necesidades, y luego explicar cómo abordará estas necesidades a través de proyectos locales.

¿PARA QUÉ TIPOS DE PROYECTOS HA UTILIZADO LA CIUDAD ESTOS FONDOS EN EL PASADO?

En el año del programa 2019, la Ciudad asignó fondos de CDBG al Proyecto de Acera de S. Dogwood, el Proyecto de Accesibilidad al Parque y el Proyecto de Línea de Flotación de Kelley Street. La Ciudad continuó proporcionando \$140,000 a la Autoridad de Reurbanización y Vivienda de Harrisonburg para el servicio de la deuda del desarrollo de viviendas harrison Heights que proporcionó 40 unidades para residentes de ingresos bajos y moderados (LMI). También se proporcionaron fondos a cinco organizaciones con el objetivo de proporcionar servicios públicos a los residentes de LMI: VPAS Meals on Wheels, The Suitcase Clinic, The Arc, Pleasant View y The CASA Child Advocacy Program.

¿QUIÉN SE BENEFICIA DE ESTOS PROYECTOS?

Las personas y los hogares pueden calificar por sus ingresos. Por ejemplo, el ingreso total para un hogar de cuatro personas debe ser inferior a \$54,700 para que el hogar califique para uno de los proyectos o programas ofrecidos.

¿CÓMO PUEDO PARTICIPAR EN ESTE PROCESO?

Hay varias maneras de proporcionar información. Estos se enumeran en la parte posterior de esta hoja.

¿A QUIÉN PUEDO CONTACTAR PARA OBTENER MÁS INFORMACIÓN?

Kristin McCombe
Oficial de Subvenciones y Cumplimiento
(540) 432-7701
kristin.mccombe@harrisonburgva.gov

ENCUESTA EN LÍNEA

Realice nuestra encuesta en [SurveyMonkey.com/r/6CGVFDS](https://www.surveymonkey.com/r/6CGVFDS)

REUNIONES PÚBLICAS

Asista a una de las siguientes reuniones públicas:

11 de Enero de 2022 7:00 P

.M.Asistir en persona: Council Chambers - 409 South Main Street o

Ver la reunión en vivo: Public Education Government Channel 3 o en línea en

<https://harrisonburg-va.legistar.com/Calendar.aspx>

Comment llame al número: 540-437-2687

22 de Marzo de 2022 7:00 P

.M.Asistir en persona: Council Chambers - 409 South Main Street o

Ver la reunión en vivo: Public Education Government Channel 3 o en línea en

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La ciudad de Harrisonburg ofrece sus programas y servicios de una manera no discriminatoria y es un employer de igualdadde oportunidades. La Ciudad también alienta a las empresas de minorías y mujerespropietarias de mujeres a presentar ofertas y propuestas para los contratos del Programa CDBG Program y HOME. Para obtener más información y para los servicios de traducción de idiomas, póngase en contacto con el Oficial de Subvenciones y Cumplimiento al (540) 432-7701.

FAQ SHEET



The City of Harrisonburg invites your participation in the development of its 2022-2026 Consolidated Plan, the 2022 Annual Action Plan, and an Analysis of Impediments to Fair Housing, which identifies fair housing issues and recommends solutions.

What is the Analysis of Impediments to Fair Housing Choice?

Called an AI for short, it is a planning document that analyzes how well the City of Harrisonburg is expanding housing choice among members of the protected classes. Barriers to housing choice will be identified and an Action Plan will include strategies to eliminate the barriers.

What is fair housing?

It is an individual's right, established by federal law more than 50 years ago, to choose housing free from discrimination based on personal characteristics that have nothing to do with housing. It is the right to choose housing without regard to a person's **race**, **color**, **national origin**, **religion**, **sex**, **disability**, and **familial status**. Additionally, Virginia Laws also protect from discrimination against **gender identity**, **sexual orientation**, **elderliness**, **source of funds**, and **military status**. Persons who are protected from discrimination by fair housing laws are referred to as members of protected classes.

What does fair housing mean for me as a city resident?

Fair housing focuses on keeping your housing or searching for housing free from discrimination. It also includes having access to community assets such as employment, public transit, safe neighborhoods, quality schools—all those things that contribute to a good quality of life.

Why is the city preparing this document?

Annually, the City of Harrisonburg receives funding from the US Department of Housing & Urban Development (HUD) to carry out affordable housing and community development projects that benefit low- and moderate-income residents. HUD requires the city to prepare an AI to demonstrate that it (1) implements its housing programs without discrimination against members of protected classes and (2) works to expand access to community assets for all residents.

How can I participate in this process?

There are several ways you can provide input. These are listed on the back of this sheet.

Who can I contact for more information?

You can contact the CDBG Coordinator at cdbg@harrisonburgva.gov, or at (540)432-8926 to leave a message.

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La ciudad de Harrisonburg invita a su participación en el desarrollo de su Plan Consolidado 2022-2026, el Plan de Acción Anual 2022 y un Análisis de Impedimentos a la Vivienda Justa, que identifica problemas de vivienda justa y recomienda soluciones.

¿CUÁL ES EL ANÁLISIS DE LOS IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA?

Llamado una IA para abreviar, es un documento de planificación que analizará tan bien la ciudad de Harrisonburg está expandiendo la elección de vivienda entre los miembros de las clases protegidas. Se identificarán los obstáculos a la elección de la vivienda y un plan de acción incluirá estrategias para eliminar los obstáculos.

¿QUÉ ES LA VIVIENDA JUSTA?

Es un derecho individual, establecido por la ley federal hace más de 50 años, elegir una vivienda libre de discriminación basada en características personales que no tienen nada que ver con la vivienda. Es el derecho a elegir vivienda sin tener en cuenta [la raza](#), [el color](#), [el origen nacional](#), [la religión](#), [el sexo](#), [la identidad de género](#), [la orientación sexual](#), [la edad mayor](#), [los ingresos](#), [el estado de veterano](#), [la discapacidad](#), y [el estado familiar](#). Las personas que están protegidas de la discriminación por las leyes de vivienda justa se conocen como miembros de clases protegidas.

¿QUÉ SIGNIFICA VIVIENDA JUSTA PARA MÍ COMO RESIDENTE DE LA CIUDAD?

La vivienda justa se centra en mantener su vivienda o la búsqueda de vivienda libre de discriminación. También incluye tener acceso a activos comunitarios como empleo, transporte público, vecindarios seguros, escuelas de calidad, todas aquellas cosas que contribuyen a una buena calidad de vida.

¿POR QUÉ LA CIUDAD ESTÁ PREPARANDO ESTE DOCUMENTO?

Anualmente, la Ciudad de Harrisonburg recibe fondos del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD, por sus familiares) para llevar a cabo proyectos de vivienda asequible y desarrollo comunitario que beneficien a los residentes de ingresos bajos y moderados. HUD requiere que la ciudad prepare una IA para demostrar que (1) implementa sus programas de vivienda sin discriminación contra los miembros de clases protegidas y (2) trabaja para ampliar el acceso a los activos de la comunidad para todos los residentes.

¿CÓMO PUEDO PARTICIPAR EN ESTE PROCESO?

Hay varias maneras de proporcionar información. Estos se enumeran en la parte posterior de esta hoja.

¿A QUIÉN PUEDO CONTACTAR PARA OBTENER MÁS INFORMACIÓN?

Kristin McCombe
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THE CITY OF HARRISONBURG VIRGINIA

The Consolidated Plan consists of three major sections: a housing and community development needs assessment, a housing market analysis, and a strategic plan which identifies those priority housing and community development needs and strategies that the City plans to address with the available HUD resources over the next five years.

MEDIAN RENT



Data source: 2019 ACS B25031

MEDIAN HOME VALUE



\$203,600

Data Source: 2019 ACS



MEDIAN HOUSE- HOLD INCOME

\$46,679

Data Source: 2019 ACS

WHO IS IMPACTED BY A LACK OF AFFORDABLE HOUSING?



A single income household earning minimum wage at **\$9.50/hour** would need to work **70 HOURS / WEEK** to afford a 2-bedroom apartment in Harrisonburg.



38%
of all households are cost burdened*



67%
of cost burdened households are elderly (age 62+)



54%
of cost burdened households are predominantly single persons

297

people were experiencing **HOMELESSNESS** during the 2020 PIT Count.

Age	#
Children Under Age 18	41
Persons Age 18-24	37
Persons Over Age 24	219

Persons in Shelter	#
Emergency Shelter	262
Transitional Housing	0
Unsheltered	35

WE NEED YOUR INPUT!

Take our online survey at [SurveyMonkey.com/r/6CGVFDS](https://www.surveymonkey.com/r/6CGVFDS)

Or attend one of our public meetings: January 11 & March 22 at 7:00pm in Council Chambers



Data sources: 2013-2017 CHAS & 2019 ACS

*Households paying more than 30% of their income on housing are considered cost burdened.



PLEASE JOIN US FOR A

STAKEHOLDER MEETING

YOUR VOICE, THOUGHTS AND OPINIONS MATTER!

You are invited to join the City of Harrisonburg for a virtual meeting on the 2022-2026 Consolidated Plan, 2022 Annual Action Plan and Analysis of Impediments to Fair Housing Choice.

please join us



- October 13, 2021 | 10AM-11AM
- October 14, 2021 | 10AM-11AM
- October 14, 2021 | 2PM-3PM

GoToMeeting

<https://global.gotomeeting.com/join/579241429>

or

+1 (646) 749-3122

Access Code:579-241-429

Danielle Rich

From: Kristin McCombe <Kristin.McCombe@harrisonburgva.gov>
Sent: Thursday, September 23, 2021 2:03 PM
Subject: FW: draft language for stakeholder meetings and attachments
Attachments: FAQ_CP_ENG_Harrisonburg.pdf; FAQ_AI_ENG_Harrisonburg.pdf; Harrisonburg Stakeholder Invitation_v2.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear CDBG Stakeholders:

The City of Harrisonburg is initiating the preparation of its **2022-2026 Consolidated Plan, 2022 Annual Action Plan and Analysis of Impediments to Fair Housing Choice**. As key community stakeholders in the City of Harrisonburg, we are seeking your participation in a series of virtual workshops scheduled for October 13-October 14, 2021.

The five-year **Consolidated Plan** will identify the affordable housing and community development needs in the City of Harrisonburg over the next five years. Annually the City receives Community Development Block Grant (CDBG) funds. To continue receiving these funds, the City of Harrisonburg is required to identify and prioritize its needs, then explain how it will address these needs through local projects as part of the **Annual Action Plan** for FY 2022.

The Analysis of Impediments to Fair Housing Choice (AI for short) involves a review of the housing and housing-related programs and policies to ensure they are implemented free from discrimination and are administered without regard for a person's race, color, national origin, religion, sex, disability, and familial status. Additionally, Virginia Laws also protect from discrimination against gender identity, sexual orientation, elderliness, source of funds, and military status.

Your participation in the Stakeholder Workshops is very important to this process. As practitioners in your field, the City wants to hear your opinions and ideas on the priority needs for the next five years—affordable housing, fair housing, neighborhood preservation, services needed to improve economic self-sufficiency among lower income residents, public infrastructure and facilities improvements needed to maintain The City of Harrisonburg's neighborhoods and commercial areas, and much more.

Join us at any one or more of the following virtual **Stakeholder Workshops**. The purpose of these workshops is for the City of Harrisonburg to listen to you—tell us what the needs are for the residents you serve throughout the community.

Wednesday October 13th | 10:00am-11:00am

Thursday October 14th | 10:00am-11:00am

Thursday October 14th | 2:00pm-3:00pm

All three workshops can be accessed from your computer, tablet or smartphone. The link is also on the attached flyer.

<https://global.gotomeeting.com/join/579241429>

You can also dial in using your phone.

United States: +1 (646) 749-3122

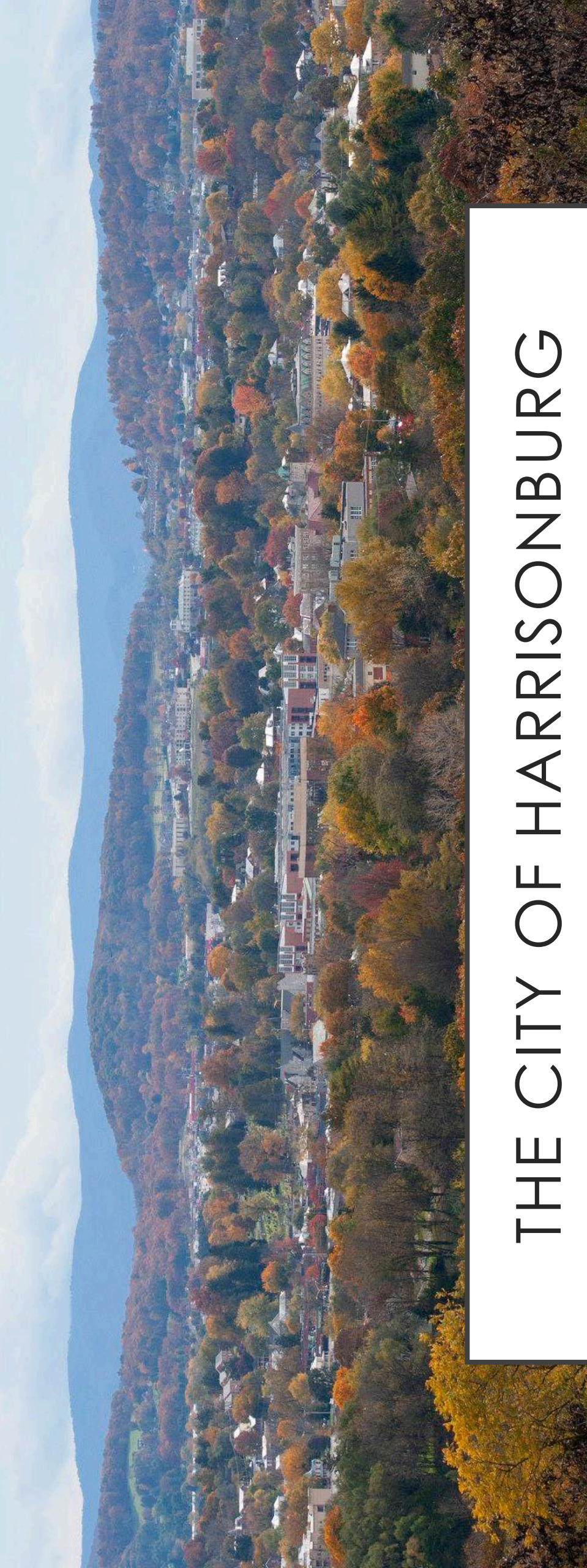
Access Code: 579-241-429

Two **FAQ sheets** are also attached. This provides a brief overview of the process and how you, your colleagues and clients can get involved and have your voices heard.

Finally, take our **online survey** at [SurveyMonkey.com/r/6TRZYRW](https://www.surveymonkey.com/r/6TRZYRW) (la encuesta española en: <https://www.surveymonkey.com/r/6CGVFDS>) and feel free to forward the survey link to colleagues, clients, neighbors and friends.

I look forward to seeing you October 13 and 14th. Feel free to contact me with any questions.

Kristin McCombe
CDBG Coordinator
Office of the City Manager
409 S. Main St.
Harrisonburg, VA 22801
(540)432-8926



THE CITY OF HARRISONBURG

Public Meetings for:

2022-2026 Consolidated Plan

2022 Annual Action Plan

Analysis of Impediments to Fair Housing Choice



CONSOLIDATED PLAN
AND
ANNUAL ACTION PLAN

WHAT IS A
FIVE-YEAR
CONSOLIDATED
PLAN?

Required for all HUD Funding

Covers the Period: July 1, 2022, thru June 30, 2026

Components:

- Stakeholder Consultation (Public Agencies, Nonprofit Service Organizations, Residents, Homeless Assistance Organizations, Public Housing Authority, etc.)
- Housing and Homeless Needs Assessment
- Housing Market Analysis
- Strategic Plan – Local Priorities
- Annual Action Plan – Proposed Activities for Program Year 2022: (July 1, 2022 – June 30, 2023)

MEETING NATIONAL OBJECTIVES

Each activity must meet one of the
THREE NATIONAL OBJECTIVES:



Benefit Low- and
Moderate-Income
Persons
(at least 70% of
grant amount)



Prevent or Eliminate
Blight
(not more than
30% of grant
amount)



Urgent Needs
when health and
welfare are
threatened

Maximum Income (80% HAMFI for Harrisonburg MSA)

Household Size

1 person	\$38,300
2 person	\$43,800
3 person	\$49,250
4 person	\$54,700
5 person	\$59,100
6 person	\$63,500
7 person	\$67,850
8 person	\$72,250

DEFINITION OF
LOW- AND MODERATE-
INCOME
IN
HARRISONBURG, VA MSA
IN 2021

BASIC CDBG ELIGIBLE ACTIVITIES



Housing
Rehabilitation



Homeownership
Assistance



Public Facilities
and
Improvements



Blight Removal
Demolition/Site
Preparation



Code
Enforcement



Economic
Development



Acquisition /
Disposition of
Real Property



Public Services

CDBG PUBLIC SERVICES

- Limited to 15% of CDBG Grant Amount
- Employment Training, Crime Prevention, Childcare, Health Care, Drug Abuse Education, Fair Housing Counseling, Energy Conservation, Homebuyer Education, or Recreation Programs

- We do not have 2022 allocations yet.
- Funding estimates based on FY21 grants:
 - CDBG \$504,419



FY 2022
FUNDING
ANTICIPATED

ACTIVITIES FUNDED IN PROGRAM YEAR 2019: CITY OF HARRISONBURG

CITY OF HARRISONBURG INVESTED FUNDS TO ASSIST:

- The S. Dogwood Sidewalk Project
- The Park Accessibility Project
- The Kelley Street Waterline Project
- \$140,000 to the Harrisonburg Redevelopment & Housing Authority for debt servicing of the Harrison Heights housing development, that provided 40 units for LMI residents.
- Funded five (5) organizations to provide public services to low- and moderate- income residents: VPAS Meals on Wheels, The Suitcase Clinic, The Arc, Pleasant View, and the CASA Child Advocacy Program.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

WHAT IS FAIR HOUSING?

The right to choose housing free from unlawful discrimination

Federal, state, and local laws protect people from discrimination in housing transactions such as rentals, sales, mortgage lending and insurance

It ensures access to housing for everyone



**EQUAL HOUSING
OPPORTUNITY**

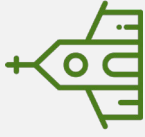
FAIR HOUSING PROTECTED CLASSES



Race



Color



Religion



Disability



Sex



Familial
Status



National
Origin



Gender
Identity



Sexual
Orientation



Elderliness



Source of
Funds



Military Status

EXAMPLES OF HOUSING DISCRIMINATION

A landlord or agent
asks questions about
your religious
practices

A unit is advertised
as "vacant" or "for
sale" but the agent
refuses to show it to
you

Extra security deposit
is required for
families with children

A landlord refuses to
rent to you because
you use a wheelchair

WE'D LIKE TO HEAR FROM YOU



PUBLIC COMMENT ...YOUR OPINION COUNTS!

WHAT ARE HARRISONBURG'S MOST URGENT NEEDS?

- Housing?
- Infrastructure?
- Facilities (Community Centers, Neighborhood Centers, Libraries, etc.)?
- Services (Job Training, Youth Programs, Childcare, etc.)?
- Employment Opportunities?

HAVE YOU AWARE OF HOUSING DISCRIMINATION?

- In your search for housing?
- In your efforts to stay in your housing?
- What did you do?

NEXT STEPS

- **Complete our survey:** [SurveyMonkey.com/r/6TRZYRW](https://www.surveymonkey.com/r/6TRZYRW).
- **January 11, 2022 | 7pm:** 1st public hearing at City Council
- **March:** Draft Consolidated Plan, 2022 AAP and AI completed
- **March:** Begin 30-Day Public Display/Comment Period
- **March 22, 2022 | 7pm:** 2nd Public Hearing at City Council
- **May:** Final City Council Approval of the 2022 AAP, Con Plan and AI
- **May 15:** Submission of Plans to HUD
- **July 1, 2022:** Program Year Begins

A dark blue circle containing the text "FOR MORE INFORMATION" in white, uppercase letters.

FOR MORE
INFORMATION

CDBG Coordinator

cdbg@harrisonburgva.gov,

(540) 432-8926 to leave a message.

Harrisonburg Stakeholder Workshops Attendees Summary

GoToMeeting

Meeting Date	Meeting Duration	Number of Atten Meeting ID
October 13, 2021 9:28 AM EDT	74 minutes	10 579-241-429

Details

Name	Email Address	Join Time	Leave Time	Time in Session (minutes)
Ande Banks	pamela.ulmer@harrisonburgva.gov	9:58 AM	10:41 AM	43
Benjamin Craig	ben@w2ginc.org	10:00 AM	10:41 AM	41
Chris Quinn		9:58 AM	10:41 AM	43
City Manager's Office	pamela.ulmer@harrisonburgva.gov	9:53 AM	10:42 AM	48
Corey Chandler	corey@ourcommunityplace.org	10:01 AM	10:41 AM	40
Danielle Rich		9:58 AM	10:42 AM	44
Gayl Brunk	ndavis@endependence.org	10:01 AM	10:41 AM	40
Heather Denman	execdir@hrarc.org	10:39 AM	10:42 AM	2
Jessica Lurz	billw@mandl.net	9:28 AM	10:42 AM	74
Jo Benjamin	jo.benjamin@uwhr.org	10:01 AM	10:41 AM	40

Harrisonburg Stakeholder Workshops Attendees Summary

GoToMeeting

Meeting Date	Meeting Duration	Number of Attendees	Meeting ID
October 14, 2021 9:45 AM EDT	70 minutes	9	579-241-429

Details

Name	Email Address	Join Time	Leave Time	Time in Session (minutes)
Adam Fletcher	adam.fletcher@harrisonburgva.gov	10:00 AM	10:55 AM	54
Beth Bland	beth@vpas.info	10:03 AM	10:55 AM	51
Danielle Rich		9:58 AM	10:55 AM	57
Diane McCarthy	mccar2dl@jmu.edu	9:59 AM	10:55 AM	55
Elizabeth McCarty - CSPDC	elizabeth@cspdc.org	10:01 AM	10:54 AM	53
Jessica Lurz	billw@mandl.net	9:45 AM	10:55 AM	70
Kristin McCombe	pamela.ulmer@harrisonburgva.gov	9:52 AM	10:55 AM	62
Pam Miller	pmiller@pleasantviewinc.org	10:00 AM	10:55 AM	55
Rebecca Joyce	rebecca@cspdc.org	9:58 AM	10:55 AM	56

Harrisonburg Stakeholder Workshops Attendees Summary

GoToMeeting

Meeting Date	Meeting Duration	Number of Attendees	Meeting ID
October 14, 2021 1:44 PM EDT	50 minutes	7	579-241-429

Details

Name	Email Address	Join Time	Leave Time	Time in Session (minutes)
Danielle Rich		2:02 PM	2:34 PM	32
Gaghan, Rachel Delores - gaghanrd		2:00 PM	2:31 PM	30
Heather Denman	execdir@hrarc.org	1:58 PM	2:31 PM	33
Jessica Lurz	billw@mandl.net	1:44 PM	2:34 PM	50
Karl Waizecker		1:51 PM	2:25 PM	33
Kristin McCombe	pamela.ulmer@harrisonburgva.gov	1:57 PM	2:34 PM	37
Nicky Fadley		2:02 PM	2:31 PM	28

Summary of Community Needs Identified during the City of Harrisonburg's Stakeholder Sessions and Regular Meetings of Local Organizations

October 13th and 14th 2021

November 9, 2021 through December 14, 2021

The City of Harrisonburg conducted three stakeholder workshops. In addition, four virtual presentations during regular meetings held by local organizations whose missions focus on improving the quality of life for residents in Harrisonburg. The following pages provide a summary of the community needs identified during each of these meetings.

Stakeholder Workshop 1

October 13, 2021 | 10:00AM

Lack of Affordable Housing

- There is a need for affordable housing across the City of Harrisonburg. Stakeholders note many clients needing assistance locating housing.
- In addition to the need for affordable housing, there is a need to ensure affordable units are located near transit stops.

Accessibility

- There is a lack of accessible housing in the city for individuals with disabilities.
- The Dream Come True Playground is excellent model for playgrounds across the city. There is a desire to continue adding accessibility features to parks, recreation, and public facilities.

Transportation

- Public transit stops are in places without sidewalks or bicycle lanes and often must use private property as a route to get to the transit stop.
- Public transit system isn't timely or efficient- can often take 2 hours to go 5 miles.
- There is also a need for accessible transportation.

Supportive Services

- There is a need for resources and services for the reentry population.
- There is a lack of childcare, especially for infants.
- There is a need for affordable childcare for 2nd or 3rd shift workers.
- Workforce and development training programs are also needed. Low mod workers were often working in hospitality and don't want to go back after pandemic. Need programs for them to find new careers.

Fair Housing

- Still seeing discrimination against source of income. Landlords aren't willing to take vouchers. One provider works with landlords to prevent or avoid fair housing issues. They note landlords seem receptive to working with them to correct problems.

Stakeholder Workshop 2

October 14, 2021 | 10:00AM

Fair Housing

- Stakeholders note there is a need for Fair Housing education across the city. It was suggested a community-wide training for landlords and renters be held.
- Several property owners are not willing to rent to students. Under Virginia's Fair Housing protections, aged 55+ is a protected class, but there were questions as to if other age groups are protected.

Supportive Services

- There is a need for affordable eldercare and childcare. Stakeholders note there is no public or private assistance available to Asset Limited, Income Constrained, Employed (ALICE) households.
- One stakeholder noted her organization's childcare center is weekday only and due to staffing issues, they are not able to meet the need of second and third shift childcare.
- There is a lack of homemaker services and respite services for older adults. There has been an increased need for meals and transportation services.

Challenges to Affordable Housing

- There is a lack of accessible housing for those with disabilities or for those who are aging. Several stakeholders note people in the city aren't able to find affordable housing, forcing them to move outside of the city where they have less access to services.
- Lack of independent senior housing in the city.
- There is a continued need for financial assistance for first-time homeownership.

Stakeholder Workshop 3

October 14, 2021 | 2:00 PM

Special Needs Housing

- Stakeholders reported there is a need for apartments for persons with developmental disabilities and to have supportive services separate from housing to allow for the greatest level of independence.
- There is a need for non-congregate shelters for persons experiencing homelessness.
- Stakeholders note there is a need for case management support. There is a lack of funding in general for this service and the Community Resource Center has seen an increased level of clients needing services.

Infrastructure Improvements

- There is a lack of sidewalks in the city, particularly on busy roads, causing dangerous situations for pedestrians.

Food Insecurity

- Stakeholders note an increase in food insecurities during the pandemic. It was suggested a food delivery system for persons who cannot afford transportation.

ALICE Coalition

November 17, 2021 | 1:00PM

Public Services

- Members note there is a need eviction defense services, including representation for undocumented immigrants facing evictions.
- Many people experiencing homelessness need assistance with getting key documents to apply for public benefit.
- There is a lack of affordable childcare. Members note there is nearly no childcare for children aged birth to 2 years. There is also a lack of affordable childcare for school-age children.
- The need to make public more aware of mental health services, including substance recovery was identified by one member.

Challenges to Affordable Housing

- Member stated there is a disparate impact of personal property tax on working poor (annual vehicle tax). Non-payment could mean losing vehicle then no way to get to work or school. Households are given very little notice (bills sent in late October and payment due in December; taxes due can vary from year to year) which makes it very difficult to low-income households to budget for this. One solution suggested by a member of the committee would be change the due date or allow to payment plans over time.
- One member noted a need improved code enforcement.

Fair Housing

- Members noted there are a handful of management companies that control a large percentage of the rental units. These companies often have unreasonable application requirements such as 3-4 times the rent amount in salary and some will charge \$50-\$75/application fee even though they know the applicants will be denied.
- Members believe there are passive ways landlords are discriminating, such as source of income discrimination, by using credit score to deny applicants.
- Members note there is discrimination in housing based on past criminal history.

Transportation

- Members mentioned there is no public transit during 2nd and 3rd shifts and the limited nature of current routes, particularly into the county.
- It was identified there is a need for better infrastructure on existing routes, including sidewalks to access all bus stops, bus shelters to protect those waiting for buses and other ways to improve ridership experience.
- Local taxis and Ubers are more expensive than the bus but do provide alternatives when needed.
- One member noted the need for seat belts for children on public buses.

Harrisonburg Redevelopment and Housing Authority Board

November 17, 2021 | 4:00PM

Challenges to Affordable Housing

- Board members discussed the difficulty clients are having finding landlords willing to rent to households with a Section 8 voucher. It was noted there are over 5,000 people on the waiting list currently with an additional 700 people currently searching for a unit. The Housing Authority allows 100 days to find a unit.
- There is a need for 1- and 2-bedroom units and large units for families. Many apartment complexes rent larger units to students. It was noted the sizes and nature of units within the city are not meeting the needs of low-to moderate income households.
- Board members noted the need for a way to measure the city's efforts on creating and preserving affordable housing.
- Board members note the challenges of being a college town and its impacts on affordable housing.
- Board members also noted there is a need to address racial equity in homeownership within the city.

Infrastructure Improvements

- Board members discussed the role zoning plays in affordable housing. Several note there is very little land available, and the land that is available is not developable due to zoning or the lack of infrastructure.
- Board members note the city currently has very low density. It was noted the city is undergoing a zoning ordinance update currently, however due to a shortage of staff at the city level, progress has been slowed down.
- Board members note there is a need for housing for households at the 0-30% AMI level and "workforce" level, but without increased density, there is little that can be built.
- One board member stated Habitat for Humanity has the funding to build housing, but the biggest barrier is the cost of infrastructure.

Childcare

- It was noted there is a need for affordable childcare. Members stated the city is a "childcare desert."

Continuum of Care

November 17, 2021 | 3:00PM

Challenges to Affordable Housing

- Affordable housing continues to be a problem in the community.
- The CoC members note a need Single Room Occupancy (SROs).
- Persons experiencing homelessness have barriers to access housing. Members also note several rental management companies taking over the market for student housing and making requirements/criteria unobtainable for others.
- Other communities within the CoC are doing master leases to overcome some of the barriers to accessing housing.
- CoC members noted they are anticipating an increased affordable housing crisis as enrollment in area schools increases.

Homeless Services

- The CoC now has a new best practices committee, but they are still working on gathering information from outside resources/other CoCs.

City Executive Leadership Meeting

December 14, 2021 | 8:30AM

Challenges to Affordable Housing

- Executive leaders noted the increasing housing market in Harrisonburg. One noted a local realtor saying the market is “hot” and getting tighter.
- There is a need to bridge the connection between private developers and available federal funding. It will be important to ensure private developers are aware of opportunities for funding, especially as additional federal dollars become available.
- There is a continued need for accessible housing.
- Leadership discussed the need to incorporate energy efficiency and fire safety in the housing discussion.
- It was noted there has been discussion within the community for the creation of medial respite care housing. This would serve the needs of persons with a medical condition and experiencing homelessness.

Infrastructure

- Public works noted the continued need to address sidewalks within the city. The Bicycle and Pedestrian Plan was updated in 2022 and discusses these needs.
- Public transportation continues to be a need. Service expansion and extended hours are still priorities.

Public Services

- There continues to be a need for homeless services in the city.
- Leadership would like to see continued support of public services by non-profit partners.

DAILY NEWS-RECORD

STATE OF VIRGINIA
CITY/COUNTY OF ROCKINGHAM

Subscribed and sworn to before me in
the jurisdiction aforesaid this 11th day
of November, 2021, by

Sharon L. Posey

CERTIFICATE OF PUBLICATION

Community Development Block Grant

THIS IS TO CERTIFY THAT the
attached advertisement of:

11/9 Public Hearing
Consolidated Plan


appeared in
THE DAILY NEWS-RECORD
on the following date:

November 3, 2021

At \$17.75 per inch, Cost \$266.25

DUPLICATE by

Sharon L. Posey



PUBLIC HEARING NOTICE
CITY OF HARRISONBURG
COMMUNITY DEVELOPMENT BLOCK GRANT
PROGRAM

PUBLIC HEARING - The City of Harrisonburg will hold a public hearing on Tuesday, November 9, 2021 at 7:00 p.m. in the City Council Chambers, 409 South Main Street. The City of Harrisonburg is seeking participation as it initiates the preparation of its **2022-2026 Consolidated Plan, 2022 Annual Action Plan and Analysis of Impediments to Fair Housing Choice.**

The five-year **Consolidated Plan** will identify the affordable housing and community development needs in the City of Harrisonburg over the next five years. Annually the City receives Community Development Block Grant (CDBG) funds. To continue receiving these funds, the City of Harrisonburg is required to identify and prioritize its needs, then explain how it will address these needs through local projects as part of the Annual Action Plan for FY 2022. The **Analysis of Impediments to Fair Housing Choice** (AI for short) involves a review of the housing and housing-related programs and policies to ensure they are implemented free from discrimination.

All citizens and organizations are invited to attend the public hearing to comment orally or in writing on funding needs and priorities. Questions regarding the grant program are also encouraged. The City of Harrisonburg will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City at least three working days in advance of the meeting.

Please contact Kristin McCombe at kristinn@harrisonburgva.gov, or 540-432-8926 with questions. Written comments may also be mailed to Kristin McCombe, CDBG Coordinator, 409 South Main Street, Harrisonburg, VA 22801.

*State of VA
City of Harrisonburg
On November 12, 2021, Sharon Posey
personally appeared before me
and executed the above instrument*

Kristi L Habwe

my Commission expires 4.30.22





Public Hearing for the City of Harrisonburg Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
November 9, 2021 7:00PM

The following provides an overview of the public needs meeting and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- 1) The meeting began at 7:00PM with a presentation by M&L Associates of the overall purpose of the public meeting, a general review of the 5-year Consolidated Plan, eligible activities under CDBG, the National Objectives, Fair Housing overview and the proposed schedule for adoption and submission of the 2022 Plans to HUD.
- 2) Following the presentation, the meeting was opened to the public and City County to provide comments on housing and community development needs. The following items/needs/issues were stated by the meeting attendees:
 - a) One member of the public wanted to provide comment on the Impediments to Fair Housing, noting there are structural impediments to Fair Housing in the City of Harrisonburg. There is a high level of segregation at the neighborhood level. It was also stated the Community Development office was set up in the 20th century and many of the zoning ordinances are exclusionary. The member of the public stated there have been over 500 acts of zoning enforcement, and many are nuisance related, such as junk in the yard and tall grass. It was also stated there is an "anti-black" issue that has national origins and is a major concern for the City of Harrisonburg.
 - b) It was noted there is possible fair housing issues with larger developers and property owners. Many of the apartments within the City serve the college student population and it is challenging to find affordable housing.
 - c) One member of council asked if CDBG funds could be used for infrastructure, noting there have been concerns raised about the housing authorities' grounds and buildings.
 - d) Several members discussed the need to be proactive in regard to fair housing issues in the community. The process for fair housing complaints was described and the annual fair housing training provided by City staff. The City has also tried on several occasions to request fair housing testing from the HUD funded state agency.

DAILY NEWS-RECORD

STATE OF VIRGINIA
CITY/COUNTY OF ROCKINGHAM

Subscribed and sworn to before me in
the jurisdiction aforesaid this
30th day of November, 2021 by

...Thelise Estes

Sharon Lynn Posey
Sharon Lynn Posey - Notary Public
My commission expires 08/31/2025
Notary Registration Number: 7965794

Certificate of Publication
COMMUNITY DEVELOPMENT BLOCK GRANT
THIS IS TO CERTIFY that the attached
advertisement of:
12/6 PUBLIC HEARING
CONSOLIDATED PLAN
PO#:

appeared in the DAILY NEWS-RECORD
on the following dates:

11/29/2021

At 17.75 per inch, ~~line~~. Cost \$266.25

DUPLICATE by *...Thelise Estes*



PUBLIC MEETING NOTICE
CITY OF HARRISONBURG
COMMUNITY DEVELOPMENT BLOCK GRANT
PROGRAM

PUBLIC MEETING - The City of Harrisonburg will hold a public meeting on Monday, December 6, 2021 at 5:30 p.m. in the Lucy F. Simms Center at 620 Simms Ave, Harrisonburg, VA 22802. The City of Harrisonburg is seeking participation as it initiates the preparation of its **2022-2026 Consolidated Plan, 2022 Annual Action Plan and Analysis of Impediments to Fair Housing Choice**.

The five-year **Consolidated Plan** will identify the affordable housing and community development needs in the City of Harrisonburg over the next five years. Annually the City receives Community Development Block Grant (CDBG) funds. To continue receiving these funds, the City of Harrisonburg is required to identify and prioritize its needs, then explain how it will address these needs through local projects as part of the Annual Action Plan for FY 2022. The **Analysis of Impediments to Fair Housing Choice** (AI for short) involves a review of the housing and housing-related programs and policies to ensure they are implemented free from discrimination.

All residents and organizations are invited to attend the public meeting to comment orally or in writing on funding needs and priorities. Questions regarding the grant program are also encouraged. The City of Harrisonburg will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City at least three working days in advance of the meeting.

Please contact Kristin McCombe at Kristin.McCombe@HarrisonburgVA.gov or 540-432-8926 with questions. Written comments may also be mailed to Kristin McCombe, CDBG Coordinator, 409 South Main Street, Harrisonburg, VA 22801.



CITY OF HARRISONBURG

Needs Assessment Meeting

**Can you afford your apartment?
Are improvements needed in
your community?**

YOUR INPUT IS NEEDED!

The City of Harrisonburg is working to identify community development priorities, fair and affordable housing needs, and factors that shape equal access to housing.

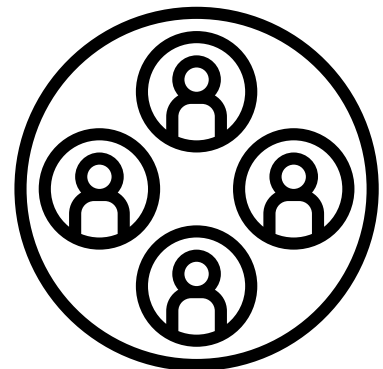
Please join us to share your thoughts on the needs of our community!

Monday

December 6, 2021

5:30PM to 6:30PM

Lucy F. Simms Center, Main Entrance
620 Simms Ave, Harrisonburg VA 22802



The City of Harrisonburg will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City at least three working days in advance of the meeting.

540-432-7701 or submit a request at
<https://www.harrisonburgva.gov/public-hearings>



CIUDAD DE HARRISONBURG

Reunión de evaluación de necesidades

**¿Puedes pagar tu apartamento?
¿Se necesitan mejoras en su comunidad?**

¡SU OPINIÓN ES NECESARIA!

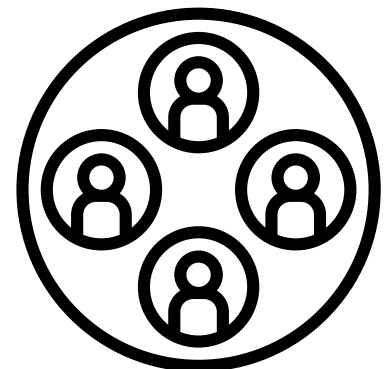
La ciudad de Harrisonburg está trabajando para identificar las prioridades de desarrollo comunitario, las necesidades de vivienda justas y asequibles, y los factores que dan forma a la igualdad de acceso a la vivienda. Por favor, únase a nosotros para compartir sus pensamientos sobre las necesidades de nuestra comunidad!

Lunes

Diciembre 6, 2021

5:30 a 6:30PM

Centro Lucy F. Simms, Entrada principal
620 Simms Ave, Harrisonburg, VA 22802



La Ciudad de Harrisonburg hará adaptaciones y servicios razonables necesarios para los ciudadanos con discapacidad sensorial y discapacitados en la reunión pública. Además, se pueden ofrecer servicios de traducción bajo petición y disponibilidad. Las personas que requieran tales adaptaciones / servicios deben comunicarse con la Ciudad al menos tres días hábiles antes de la reunión

540-432-7701 o envíe una solicitud al
<https://www.harrisonburgva.gov/public-hearings>



Public Hearing for the City of Harrisonburg Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
December 6, 2021 5:30PM

The following provides an overview of the public needs meeting and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- 1) The meeting began at 5:30PM with a presentation by M&L Associates of the overall purpose of the public meeting, a general review of the 5-year Consolidated Plan, eligible activities under CDBG, the National Objectives, Fair Housing overview and the proposed schedule for adoption and submission of the 2022 Plans to HUD.
- 2) Following the presentation, the meeting was opened to the public to provide comments on housing and community development needs. The following items/needs/issues were stated by the meeting attendees:
 - a) There has been an increase in homelessness within the city. Affordable housing continues to be a challenge.
 - b) Blue Ridge Free Clinic closed recently yet there is still a need for free medical services. Nearly 400 patients were seen and assisted with navigating resources, filling about Medicaid applications and finding providers.
 - c) There is a need to address the infrastructure, such as streets and sidewalks particularly in the North East Neighborhood.
 - d) One member asked about the prior year spending for the Housing Authorities debt service. City staff explained the is connected to the rehabilitation of the Harrison Heights project and is an annual CDBG commitment since 2005.
 - e) Valley Aging Meals on Wheels has been a recipient of CDBG funds and finds it critical to continue to provide the service in the community. Funds allow the agency to leverage other funds and fill in gaps.
 - f) There is a continued need for affordable housing and accessible housing, especially for older adults.
 - g) The city lacks affordable and accessible housing. There do not seem to be Fair Housing related issues, however there is just of available units that meet these needs.
 - h) Sidewalks in the city are in poor condition and make it challenging for persons with disabilities.



Community Development Block Grant (CDBG) Program

CONSOLIDATED PLAN 2022 – 2026
ANNUAL ACTION PLAN 2022-2023
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

1

Community Development Block Grant (CDBG) Program at a Glance



WHAT IS CDBG?



WHO IS ELIGIBLE?



WHO FUNDS CDBG?

2

How Much Does Harrisonburg Receive?

2012	\$477,713
2013	\$531,114
2014	\$505,155
2015	\$542,005
2016	\$514,843
2017	\$505,968
2018	\$559,588
2019	\$576,573
2020	\$534,269
2021	\$504,419
2022	TBD

3

Strategic Planning



CURRENTLY DEVELOPING
THE STRATEGIC PLAN



FIVE YEAR GOALS



REQUIREMENT



COPIES AVAILABLE

4

Draft 2022-2026 Strategic Plan



5



Increase Access to
and Quality of
Affordable Housing

6



Improve Public
Infrastructure

7



Provide Public
Services

8



Strengthen fair housing
enforcement, operations,
and education

9



Planning and
Administration

10



Improve Public Facilities

11

Tentative Schedule

January 3, 2022	Advertise RFP in DNR & on website for grant proposals.
January 13, 2022	Training Session for CDBG Applicants
February 10, 2022	Grant Application Deadline – receipt by NOON
February 24, 2022	Selection Committee Meeting, Consideration of Proposals, & Development of Action Plan
March 22, 2022	Council Meeting/Public Hearing #2 (Present Budget, 2022 Action Plan, Consolidated Plan, & open thirty-day Public Comment Period – 7:00 PM
April 22, 2022	All public comments must be received by 9:00 AM on April 22, 2022, to be considered.
May 10, 2022	Council Meeting/Council Final Approval of 2022 CDBG Budget/Action Plan/Con Plan (Council to consider approval of budget, & plans)*
May 15, 2022	Plans due to HUD
July 2022	Anticipated HUD Approval of 2022 CDBG Action Plan + Consolidated Plan

12

PUBLIC HEARING

Comments & Proposals may be submitted to:

Kristin McCombe
Office of the City Manager
409 South Main Street
Harrisonburg, Virginia 22801
(540) 432-8926
Kristin.McCombe@HarrisonburgVA.gov



Public Hearing for the City of Harrisonburg Consolidated Plan and Annual Action Plan
Analysis of Impediments to Fair Housing Choice
January 6, 2022 7:00PM

The following provides an overview of the public hearing and summarizes the housing and community development needs and/or comments made by attendees during the meeting.

- 3) The meeting began at 7:00PM with a presentation by M&L Associates with a general review of the CDBG program, 5-year Consolidated Plan process, National Objectives, identified six strategic planning goals and the proposed schedule for adoption and submission of the 2022 Plans to HUD.
- 4) Following the presentation, the meeting was opened to the public to provide comments on housing and community development needs. The following items/needs/issues were stated by the meeting attendees:
 - a) One participant represented Meals on Wheels, which has received CDBG funds in prior year. The participant noted her appreciation to the City for their continued support and funding. It was noted that during the pandemic, Meals on Wheels served over 18,000 meals to residents.
 - b) One participant wanted to draw attention to the fourth strategic goal identified in the presentation on fair housing. He stated the City continues to fund full time staff who's job is to enforce codes that are discriminatory. The participant stated he would like to see council remove ordinances that do not align with fair housing practices.

There were no further comments and the public hearing was adjourned.

12.16.2021

City of Harrisonburg, VA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

SUMMARY OF ONLINE RESIDENT SURVEY

An online resident survey was conducted as part of the community outreach for the Analysis of Impediments to Fair Housing Choice (AI) and the 2022-2026 Consolidated Plan. The survey was made available from October 1, 2021, to December 13, 2021.

The survey was made available in English. There were 29 responses received.

Participants were asked if they have **felt they were discriminated against** when looking for housing anywhere in City of Harrisonburg. Of the 29 respondents, 21.21% (7) stated **yes**. Of these, 100% (9 respondents, more than those who reported being discriminated against) stated a **landlord or property manager** was the person who may have discriminated against them. Approximately 12% of respondents (4), stated they were **not sure** whether they had been discriminated against.

A total of nine (9) respondents, more than those who reported being discriminated against, reported the location where the act of the discrimination may have occurred, with 66.67% (6) reporting it was in an **apartment complex** and 33.33% (3) reporting it was in a **neighborhood with mostly single-family homes**.

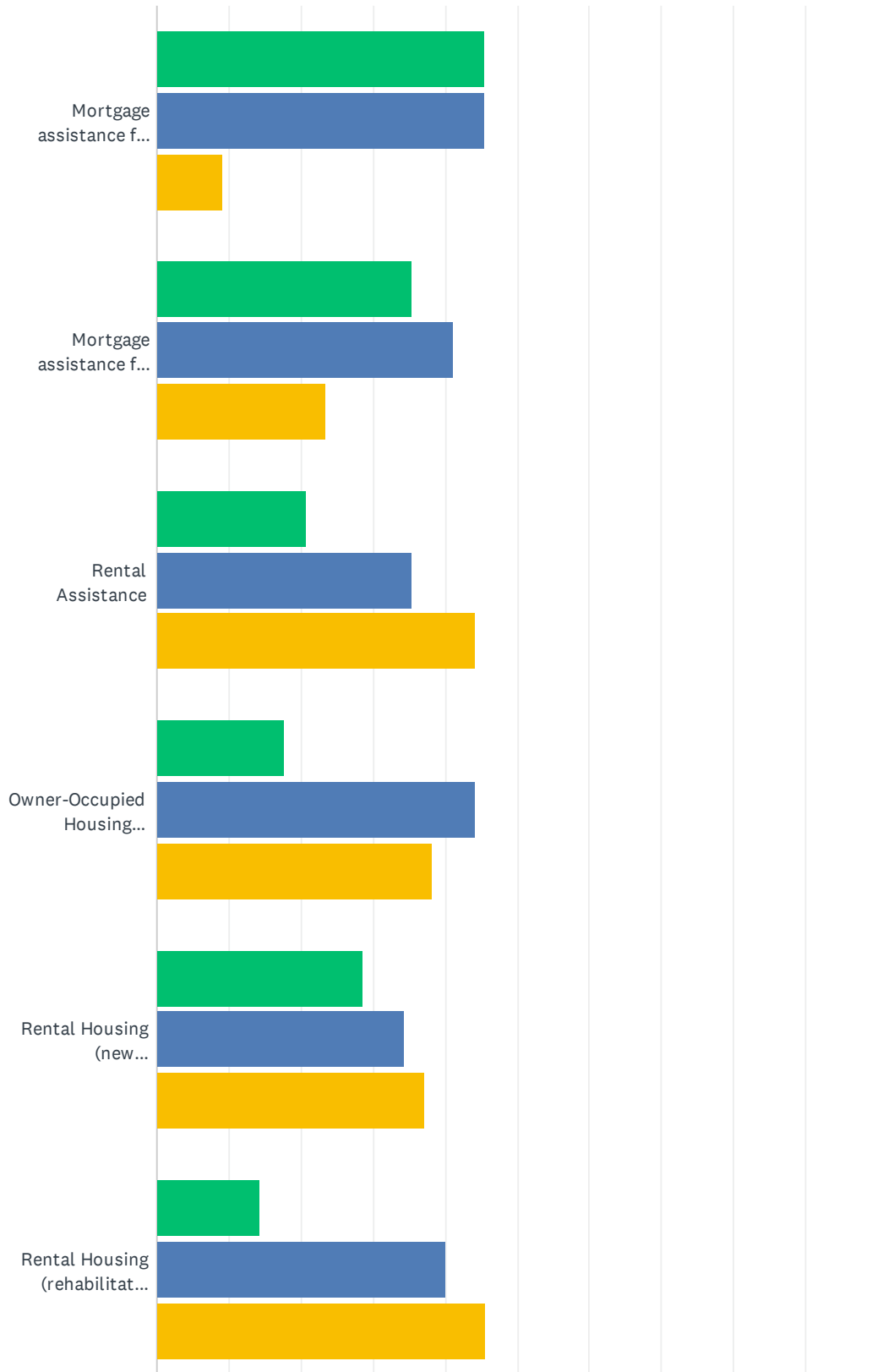
When asked on what basis they believe they were discriminated against, 33.33% reported **Family Status** (due to children), 33.33% reported **Source of funds**, and 22.22% reported **Race**. One respondent selected **Other**, and when specifying, described criminal history. One of the nine respondents reported the incident of possible discrimination **directly to the entity**. The main reason for not reporting among 5 of the 8 respondents was **“didn’t think it would make a difference.”**

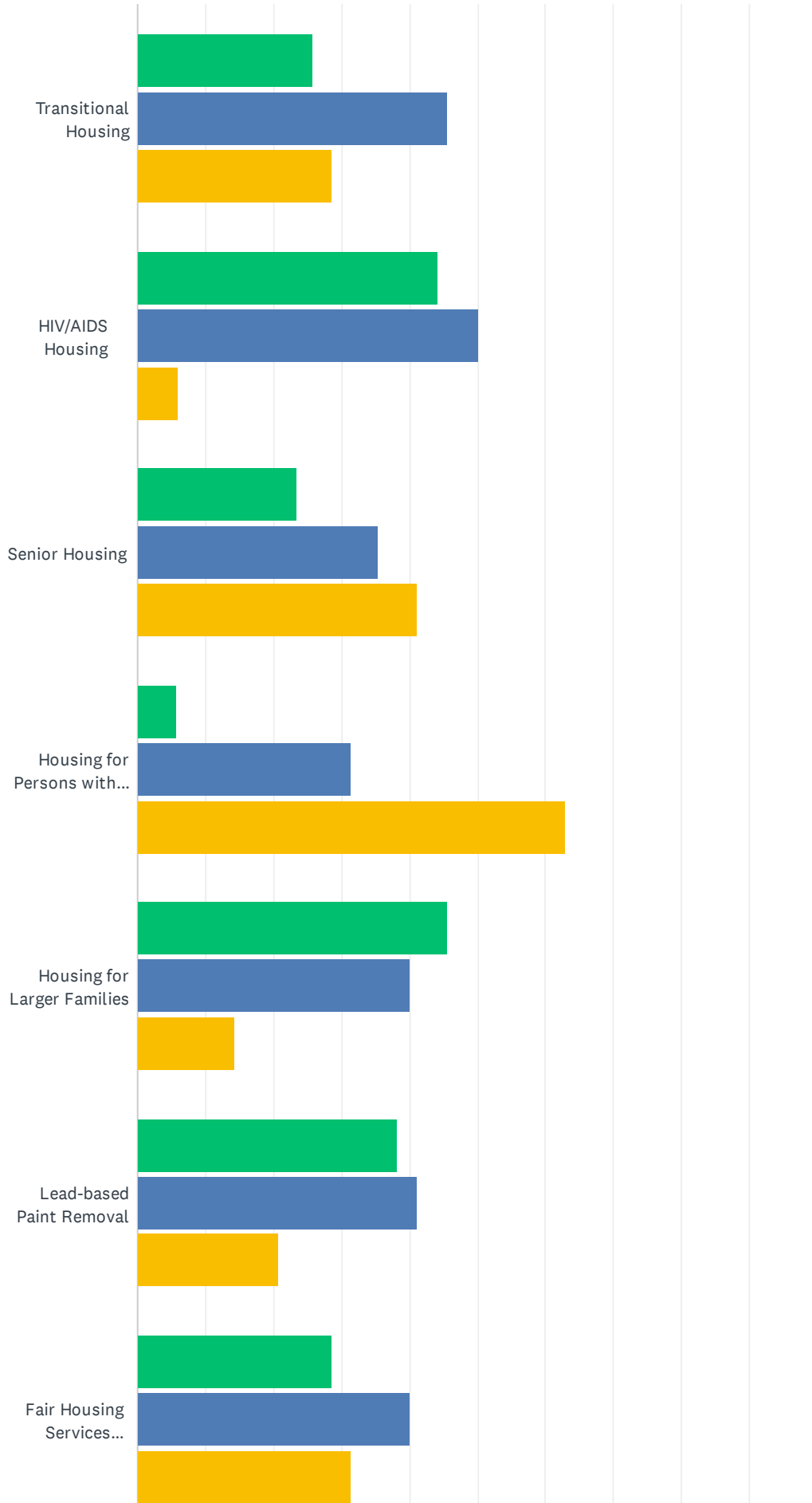
The survey also asked participants if they had ever been denied “reasonable accommodation” by a landlord. Of the 32 responses, 96.88% reported **no**. The one participant who responded yes, answered that the request was for parking and ramps.

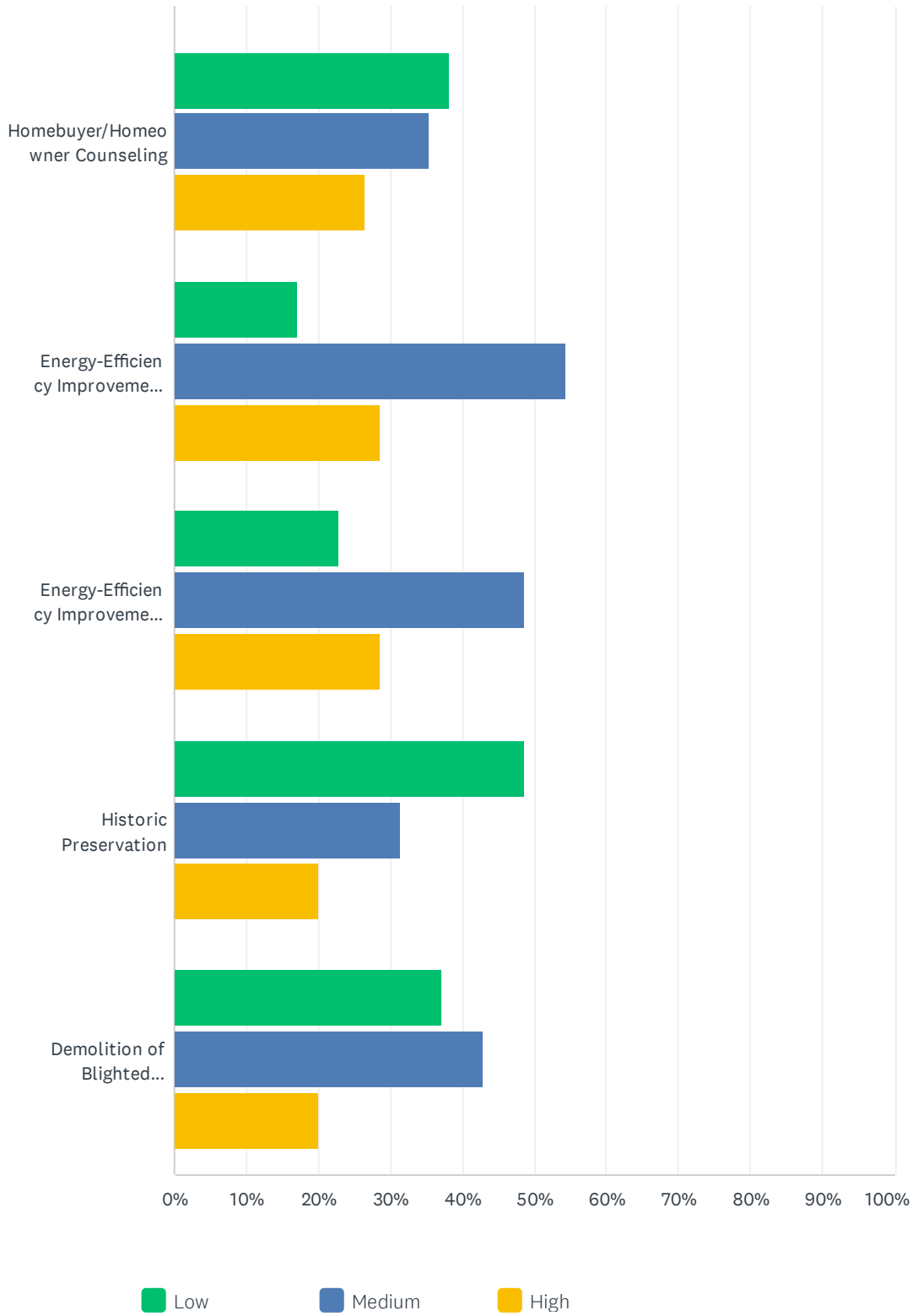
Participants were asked what they would do if they felt they were discriminated against while seeking housing, and 36.36% replied **“report the discrimination”**, 24.24% replied **“wouldn’t know what to do”**, 18.18% selected **“do nothing and look for other housing”** and **“tell the person you believe they were discriminating against you.”** When asked who they would report the discrimination to, most respondents stated they **did not know or were unsure**, followed by a lawyer, the Housing Authority, City staff or U.S Department of Housing and Urban Development (HUD).

Q1 In your opinion, what priority should be assigned to each of the following housing activities?

Answered: 36 Skipped: 1







	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Mortgage assistance for homeowners	45.45% 15	45.45% 15	9.09% 3	33	1.64
Mortgage assistance for homebuyers	35.29% 12	41.18% 14	23.53% 8	34	1.88
Rental Assistance	20.59% 7	35.29% 12	44.12% 15	34	2.24
Owner-Occupied Housing Rehabilitation	17.65% 6	44.12% 15	38.24% 13	34	2.21
Rental Housing (new construction)	28.57% 10	34.29% 12	37.14% 13	35	2.09
Rental Housing (rehabilitation)	14.29% 5	40.00% 14	45.71% 16	35	2.31
Transitional Housing	25.71% 9	45.71% 16	28.57% 10	35	2.03
HIV/AIDS Housing	44.12% 15	50.00% 17	5.88% 2	34	1.62
Senior Housing	23.53% 8	35.29% 12	41.18% 14	34	2.18
Housing for Persons with Disabilities	5.71% 2	31.43% 11	62.86% 22	35	2.57
Housing for Larger Families	45.71% 16	40.00% 14	14.29% 5	35	1.69
Lead-based Paint Removal	38.24% 13	41.18% 14	20.59% 7	34	1.82
Fair Housing Services (education, outreach and help with filing discrimination complaints)	28.57% 10	40.00% 14	31.43% 11	35	2.03
Homebuyer/Homeowner Counseling	38.24% 13	35.29% 12	26.47% 9	34	1.88
Energy-Efficiency Improvements for homeowners	17.14% 6	54.29% 19	28.57% 10	35	2.11
Energy-Efficiency Improvements for rental units	22.86% 8	48.57% 17	28.57% 10	35	2.06
Historic Preservation	48.57% 17	31.43% 11	20.00% 7	35	1.71
Demolition of Blighted Structures	37.14% 13	42.86% 15	20.00% 7	35	1.83

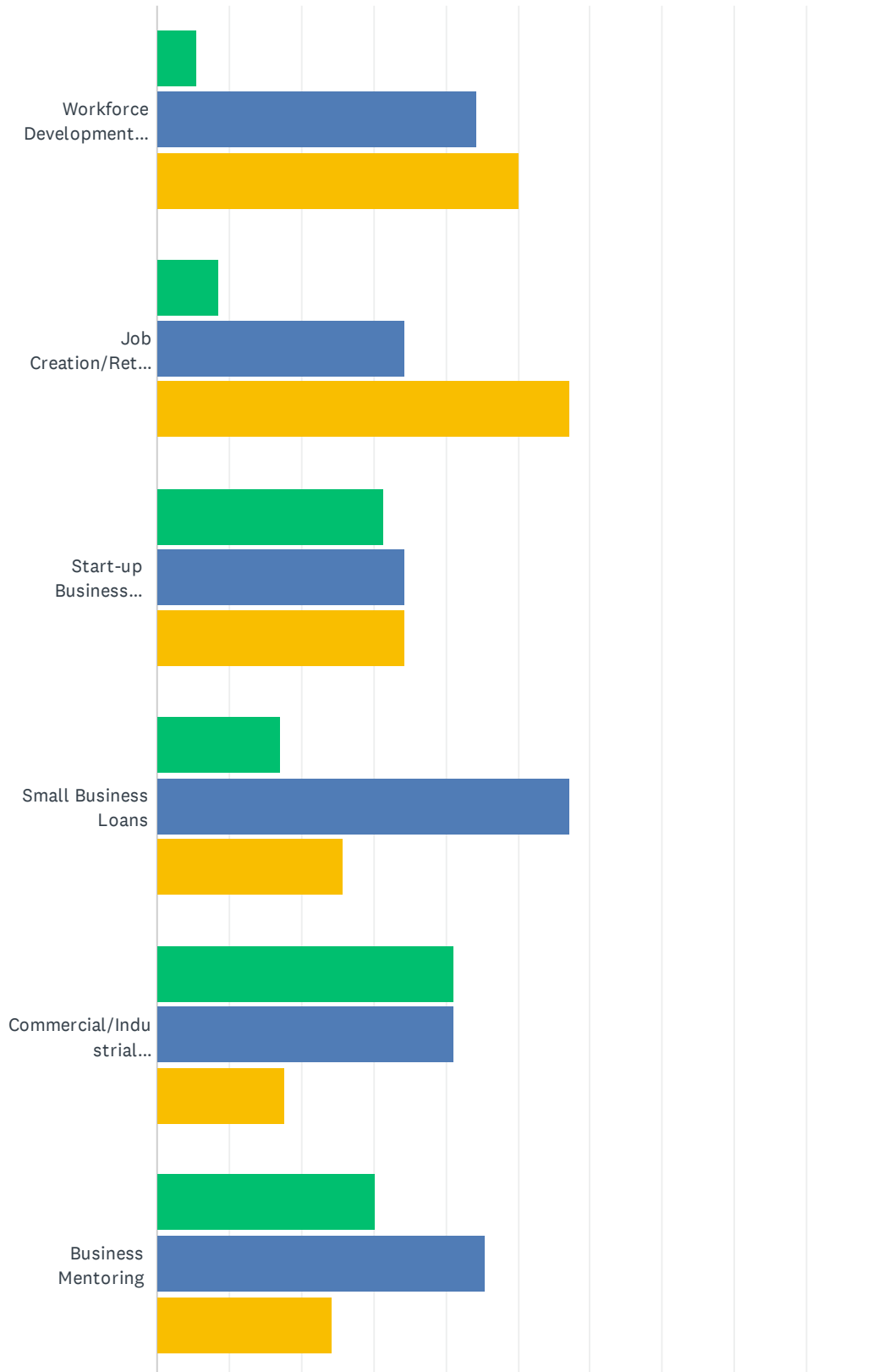
#	INDICATE OTHER ACTIVITIES OR PROVIDE ADDITIONAL COMMENTS.	DATE
1	Use of public land for housing and land trusts	11/12/2021 1:32 PM
2	You need to define transitional housing. People shouldn't buy (a mortgage) what they can't afford.	11/11/2021 5:20 PM
3	New rental construction should be for low income residents. I feel a majority of money should go to low income housing availability rather than such things as sidewalks.	11/11/2021 3:13 AM
4	There is not enough affordable housing in Harrisonburg for families. We do not qualify for low-income housing, but we cannot afford \$1500+ month for rent. A house in our neighborhood was	11/10/2021 7:01 AM

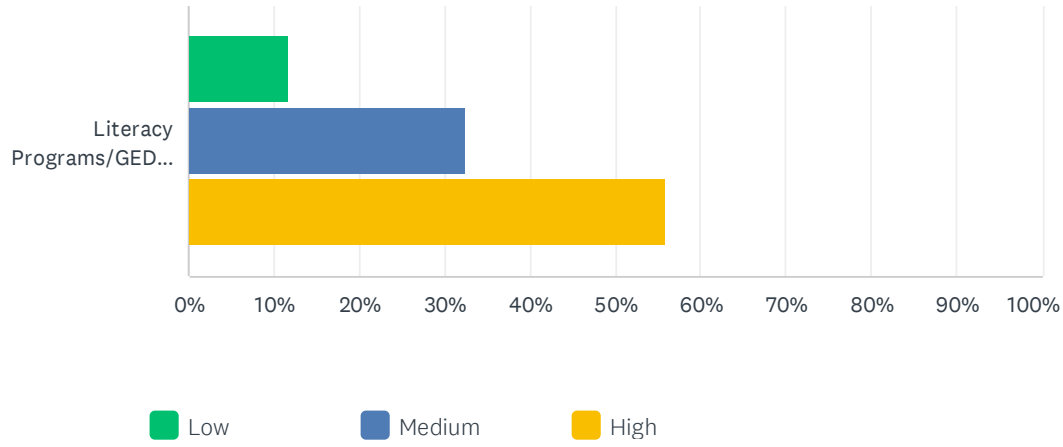
just listed for \$2300 per month. I feel like rental companies are taking advantage of families that are currently not able to buy due to the high prices. How can we fix this?

5	We would have housing if people would stop renting homes to college and letting them destroy them ! They are a eye sore in Harrisonburg	11/10/2021 5:22 AM
6	Funding for making homes more physically accessible for seniors & people with disabilities.	10/13/2021 3:06 PM
7	Affordable Housing- Permanent Supportive Housing	10/13/2021 11:03 AM

Q2 In your opinion, what priority should be assigned to each of the following economic development activities?

Answered: 37 Skipped: 0



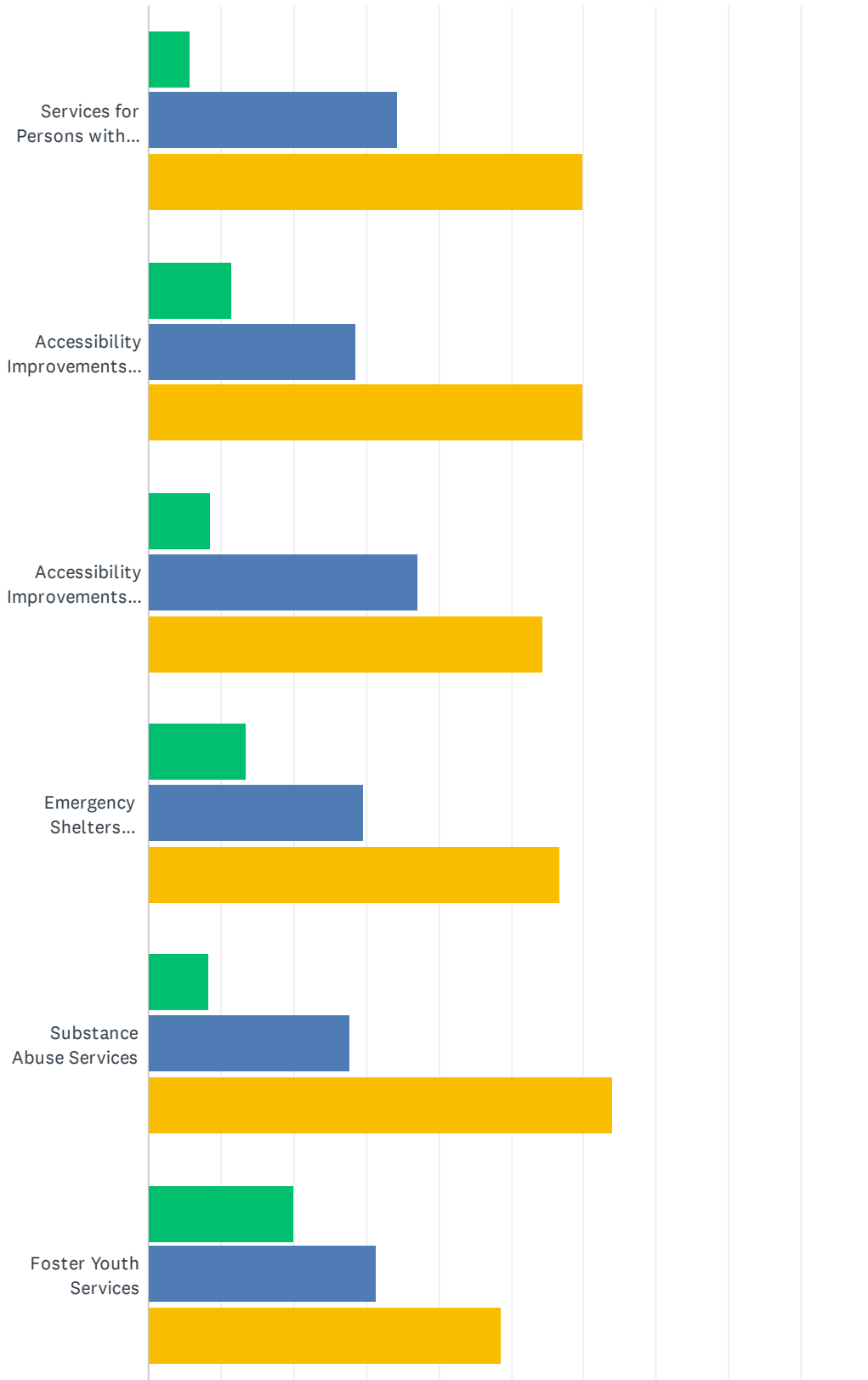


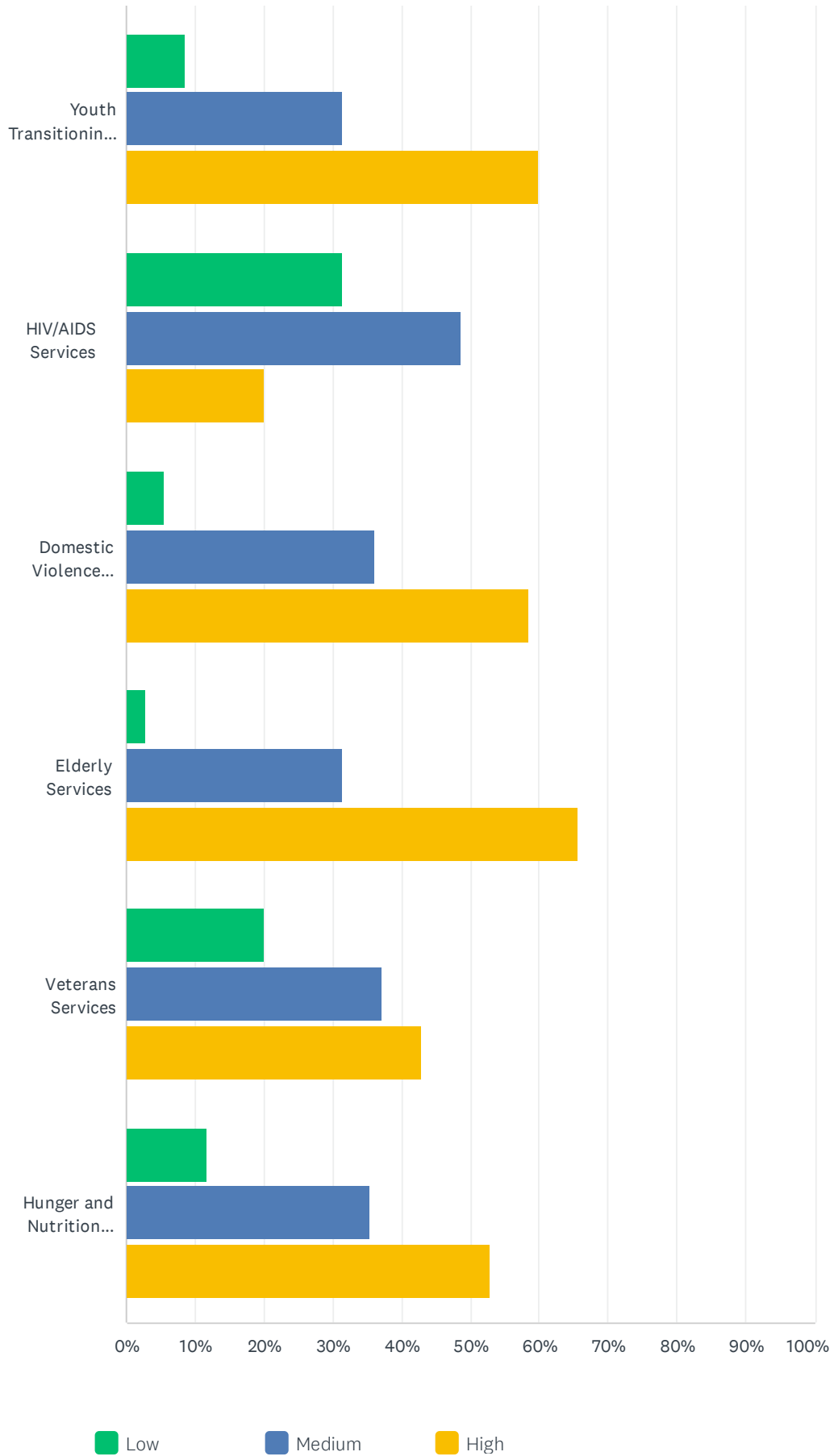
	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Workforce Development Programs	5.56% 2	44.44% 16	50.00% 18	36	2.44
Job Creation/Retention	8.57% 3	34.29% 12	57.14% 20	35	2.49
Start-up Business Assistance	31.43% 11	34.29% 12	34.29% 12	35	2.03
Small Business Loans	17.14% 6	57.14% 20	25.71% 9	35	2.09
Commercial/Industrial Rehabilitation	41.18% 14	41.18% 14	17.65% 6	34	1.76
Business Mentoring	30.30% 10	45.45% 15	24.24% 8	33	1.94
Literacy Programs/GED Preparedness	11.76% 4	32.35% 11	55.88% 19	34	2.44

#	INDICATE OTHER ACTIVITIES OR PROVIDE ADDITIONAL COMMENTS.	DATE
1	Growth opportunity funding for locally and minority-owned businesses	11/12/2021 1:32 PM
2	Help those that stay at red front (open doors) seek rehab and get them a job !!!!	11/10/2021 5:22 AM
3	Supported Employment for individuals who have disabilities.	10/13/2021 3:06 PM
4	English language classes	10/13/2021 11:04 AM

Q3 In your opinion, what priority should be assigned to each of the following special needs and services activities?

Answered: 37 Skipped: 0



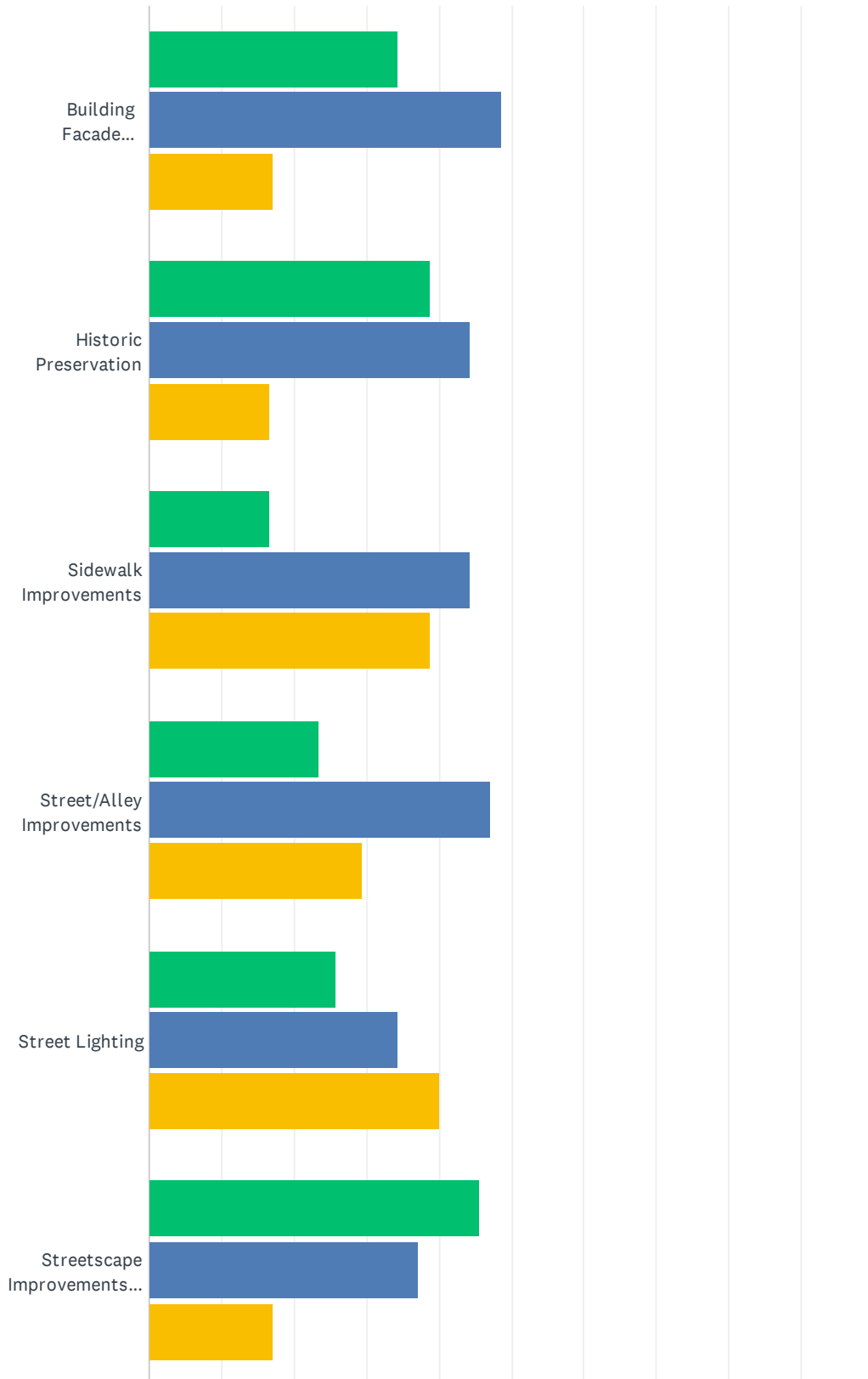


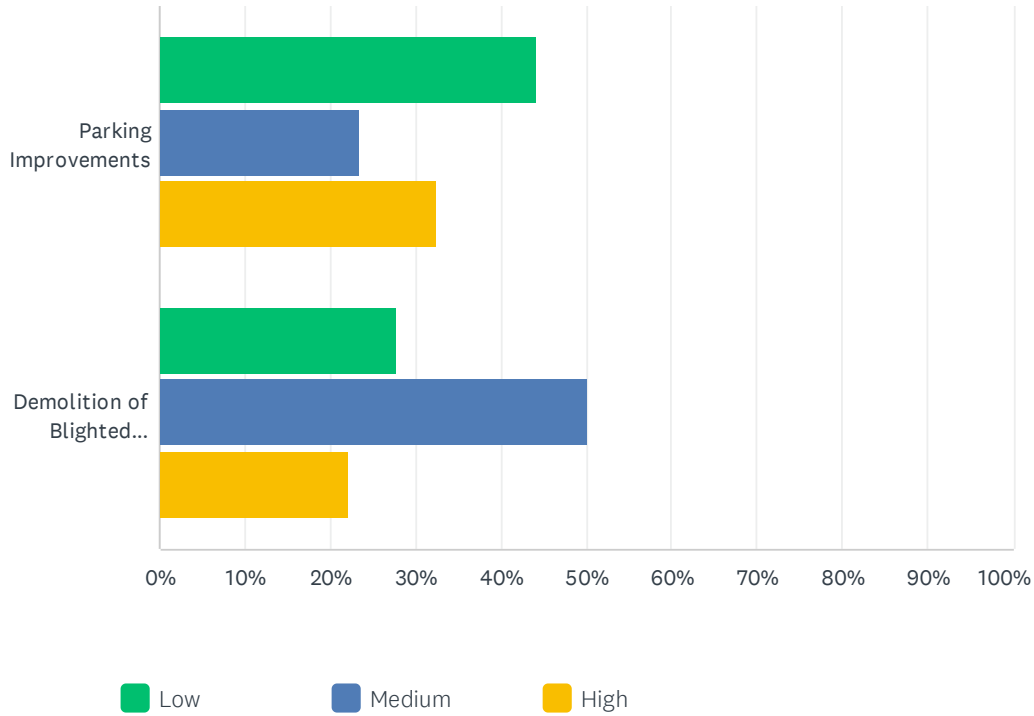
	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Services for Persons with Disabilities	5.71% 2	34.29% 12	60.00% 21	35	2.54
Accessibility Improvements for Persons with Disabilities (residential)	11.43% 4	28.57% 10	60.00% 21	35	2.49
Accessibility Improvements for Persons with Disabilities (public facilities)	8.57% 3	37.14% 13	54.29% 19	35	2.46
Emergency Shelters Homeless Services Mental Health Services	13.51% 5	29.73% 11	56.76% 21	37	2.43
Substance Abuse Services	8.33% 3	27.78% 10	63.89% 23	36	2.56
Foster Youth Services	20.00% 7	31.43% 11	48.57% 17	35	2.29
Youth Transitioning Out of Foster Care	8.57% 3	31.43% 11	60.00% 21	35	2.51
HIV/AIDS Services	31.43% 11	48.57% 17	20.00% 7	35	1.89
Domestic Violence Services	5.56% 2	36.11% 13	58.33% 21	36	2.53
Elderly Services	2.86% 1	31.43% 11	65.71% 23	35	2.63
Veterans Services	20.00% 7	37.14% 13	42.86% 15	35	2.23
Hunger and Nutrition Services	11.76% 4	35.29% 12	52.94% 18	34	2.41

#	INDICATE OTHER ACTIVITIES OR PROVIDE ADDITIONAL COMMENTS.	DATE
1	There needs to be a permanent homeless shelter and perhaps something like a dorm for homeless or very low income people.	11/11/2021 3:13 AM
2	The limited housing with severe disabilities with behavioral and physical disabilities....meaning group homes..one service provider has closed multiple homes which leaves families and residents to be placed hours away in other places in VA...which are not not able to take residents or provide proper care...this city is not a friendly city to that population ..the largest provider is Present View Homes....townhomes are being built to provide for middle class. Leaving our most vulnerable population underserved...not to mention housing for low income...this city is growing with many cultures who need housing. Leaving access to homes needs not being met	11/10/2021 4:02 PM
3	We need more food resources for our city, especially healthier options. I served a lot of families this past year and the food options they are given is sad and unhealthy. We need to do better to take care of the people who live here, regardless of their circumstances.	11/10/2021 7:01 AM
4	Also Sexual Violence services??? It affects 1 in 3 girls and 1 in 6 boys!	10/13/2021 2:01 PM

Q4 In your opinion, what priority should be assigned to each of the following neighborhood / commercial district revitalization activities?

Answered: 36 Skipped: 1



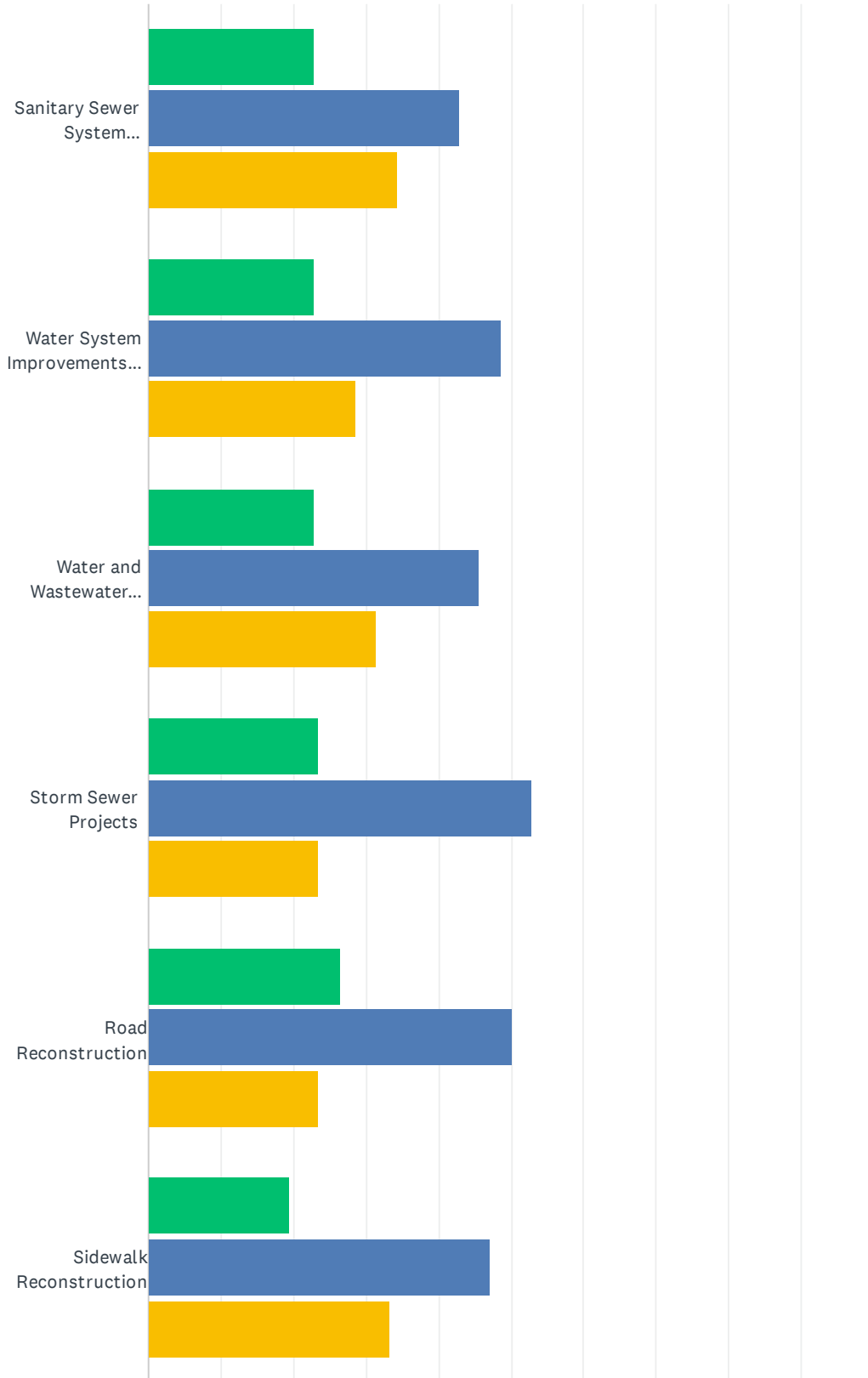


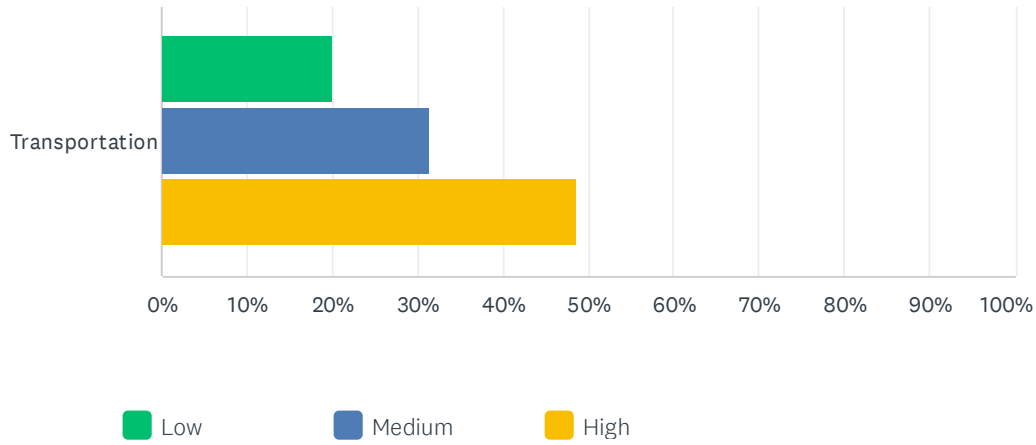
	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Building Facade (Exterior) Improvements	34.29% 12	48.57% 17	17.14% 6	35	1.83
Historic Preservation	38.89% 14	44.44% 16	16.67% 6	36	1.78
Sidewalk Improvements	16.67% 6	44.44% 16	38.89% 14	36	2.22
Street/Alley Improvements	23.53% 8	47.06% 16	29.41% 10	34	2.06
Street Lighting	25.71% 9	34.29% 12	40.00% 14	35	2.14
Streetscape Improvements (including landscaping)	45.71% 16	37.14% 13	17.14% 6	35	1.71
Parking Improvements	44.12% 15	23.53% 8	32.35% 11	34	1.88
Demolition of Blighted Structures	27.78% 10	50.00% 18	22.22% 8	36	1.94

#	INDICATE OTHER ACTIVITIES OR PROVIDE ADDITIONAL COMMENTS.	DATE
1	Tear down the eye sore buildings or give people who do up keep or renovations a tax break or something to get them motivated	11/10/2021 5:22 AM
2	I support historic preservation if you mean asking businesses to utilize older buildings to keep the charm of the city. If you mean preserving buildings as museums or whatever, NO.	10/13/2021 2:01 PM

Q5 In your opinion, what priority should be assigned to the following public infrastructure projects?

Answered: 36 Skipped: 1



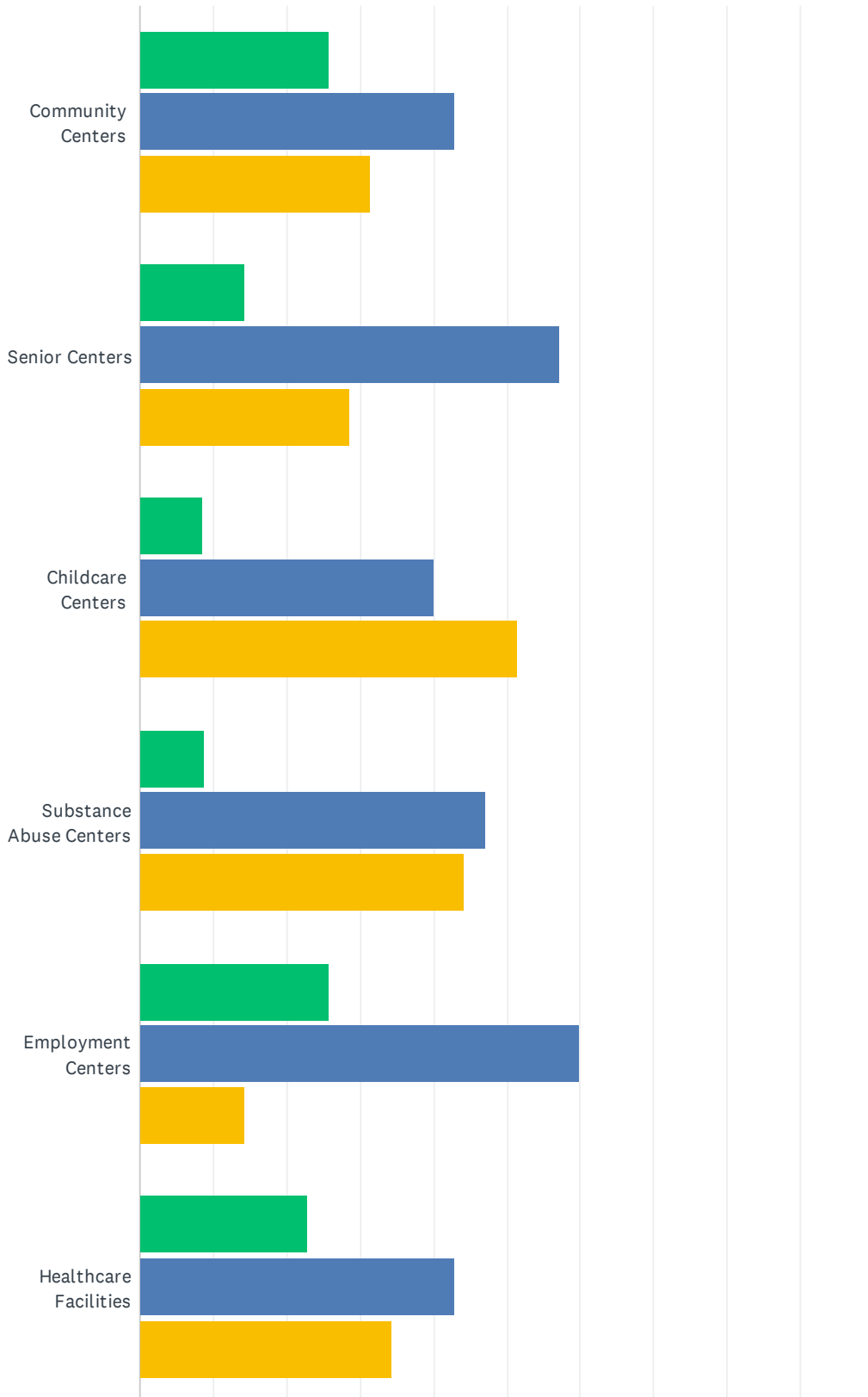


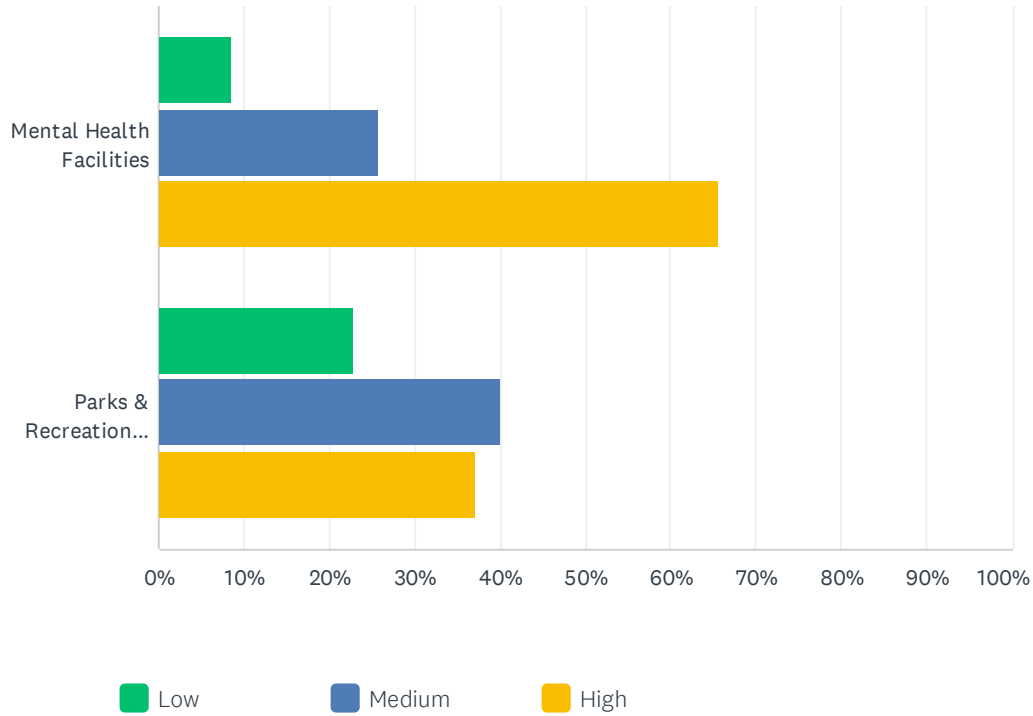
	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Sanitary Sewer System Improvements/Extensions	22.86% 8	42.86% 15	34.29% 12	35	2.11
Water System Improvements/Extensions	22.86% 8	48.57% 17	28.57% 10	35	2.06
Water and Wastewater Treatment Facilities	22.86% 8	45.71% 16	31.43% 11	35	2.09
Storm Sewer Projects	23.53% 8	52.94% 18	23.53% 8	34	2.00
Road Reconstruction	26.47% 9	50.00% 17	23.53% 8	34	1.97
Sidewalk Reconstruction	19.44% 7	47.22% 17	33.33% 12	36	2.14
Transportation	20.00% 7	31.43% 11	48.57% 17	35	2.29

#	INDICATE OTHER ACTIVITIES OR PROVIDE ADDITIONAL COMMENTS.	DATE
1	Streamline recycling; alleviate traffic congestion, particularly around JMU	10/14/2021 11:53 AM
2	the lack of reliable transportation for 2nd and 3rd shift workers needs to be addressed. The bus transit system does not serve this population and the cab companies in the city are highly unreliable	10/13/2021 3:20 PM

Q6 In your opinion, what priority should be assigned to each of the following community facilities?

Answered: 37 Skipped: 0





	LOW	MEDIUM	HIGH	TOTAL	WEIGHTED AVERAGE
Community Centers	25.71% 9	42.86% 15	31.43% 11	35	2.06
Senior Centers	14.29% 5	57.14% 20	28.57% 10	35	2.14
Childcare Centers	8.57% 3	40.00% 14	51.43% 18	35	2.43
Substance Abuse Centers	8.82% 3	47.06% 16	44.12% 15	34	2.35
Employment Centers	25.71% 9	60.00% 21	14.29% 5	35	1.89
Healthcare Facilities	22.86% 8	42.86% 15	34.29% 12	35	2.11
Mental Health Facilities	8.57% 3	25.71% 9	65.71% 23	35	2.57
Parks & Recreation Facilities	22.86% 8	40.00% 14	37.14% 13	35	2.14

Q7 Please provide any additional comments or feedback related to housing, economic development, and community development needs in your municipality.

Answered: 17 Skipped: 20

#	RESPONSES	DATE
1	The city needs to do considerably better at being a facilitator and convener of local experts and stakeholders to inform its decision-making,	11/12/2021 1:32 PM
2	Stop approving (JMU) student housing. Focus on the welfare of the people who permanently live and work in the city. The homeless need help to get out of homelessness. Not just easier homelessness.	11/11/2021 5:20 PM
3	More low incoming housing needs to be in this area. HRHA should not be funding or making loans for low income housing in non local areas.	11/11/2021 3:13 AM
4	Number one is housing for low income which the time frame you have is not quick enough to meet the needs of homes....	11/10/2021 4:02 PM
5	There continues to be new housing each year, and it always goes to college students. I understand we are a college town, but there are many year-round residents who cannot find housing. The rental property companies run these options and it eliminates so many options for those with no credit, bad credit, pets, and children. We need to send the message that we care about ALL of our community members, not just the rich parents of college students who bring more money to the City. As a 31-year old college graduate, wife, and lifelong resident, I struggle to find housing within the apartment complexes that exist due to the extreme barriers put in place by the rental companies (3 times the rent in income, credit of 650 or higher, no pets, etc.). I am forced to rent privately, but those are even harder to find. Not to mention the price of one and two bedroom apartments being above fair market value for the state. The City is showing they don't care about their long-term residents every time a college-gearred apartment complex is built.	11/10/2021 3:43 PM
6	Feels like private development in the city has stalled over the last 10 years. Prioritize making development in the city more attractive vis-a-vis the county.	11/10/2021 9:44 AM
7	The city creates a lot of surveys, but do the people you need to hear from most even know these surveys exist? I recommend having this survey in multiple languages and visiting tenants of low income housing. Further, because of fair housing policies it is almost impossible for families to compete with college students for rental housing. For example, a 3 bedroom apartment can easily rent for \$1200-1500 if 3 college students contribute to the cost; however, a single parent with children only has one income. Even if that parent has a \$15/hr job, \$600/week minus taxes and health insurance will not stretch far if that parent needs to pay for child care or a vehicle. The cost of rent is too high - but property investors are taking advantage of the college student population.	11/10/2021 6:30 AM
8	Repave residential streets on the west side like BRUCE I got a flat tire from driving that street do to pot holes	11/10/2021 5:22 AM
9	The east side of town needs attention! No parks on this side of town (mall area), our schools, esp. Skyline, are not walkable. So much attention is given to the already thriving areas like Sunset Heights or Harmony Heights. Mall area deserves parks and sidewalks and traffic abatement, too.	11/10/2021 4:47 AM
10	A higher priority should be given to affordable home ownership as a tool to sustain families and provide economic growth. Movement in this area need to happen immediately.	10/14/2021 3:40 PM
11	Having lived in Harrisonburg the majority of my life, housing has always been an issue. Coming out of college with debt makes it incredibly hard to find affordable housing that doesn't require you to share with multiple roommates or to live in college student-gearred housing. I think it's great that Harrisonburg has such a high population of college students who bring new	10/14/2021 1:48 PM

things to our area along with income by visiting our local restaurants, however, most of them have their parents paying their rents. They can afford to pay more and they are taking up opportunities for housing that local residents are in dire need of. As you saw in the housing study that was completed recently, the housing crisis is lopsided with the higher income individuals living in lower, more affordable housing to save money, while the people that need that housing don't get a chance. Our rental market is biased toward college students, we continue to see more and more apartment complexes being built with them in mind. But what about your local year-round residents who have lived here their whole lives, who work full time jobs (sometimes multiple) and still can barely afford to pay their increasing rent, put food on the table, and incur all the other costs of living. We need to create more opportunities for housing for lower and middle class income residents, and we need to broaden the landlord market. Right now there are about 3 companies in Harrisonburg that run the entire rental market in Harrisonburg. They have such high standards for renting (requiring 3 times the monthly rent in income, credit over 700, etc.). I can't think of an average person who works in Harrisonburg who makes 3 times what their monthly rent would be, considering average rent around here is now, what \$800-\$900 a month. There is no way that is feasible for any person or family. Harrisonburg needs a major overhaul on their available housing.

12	Incarceration is a huge factor, and barrier, impacting individuals. Creating more diversions from the CJ system, particularly programs not couched in the state; enhanced reentry services for those returning to the community; and working with landlords and employers to reduce barriers for those with a record would reduce recidivism, exit people from the CJ system, and reduce case loads for human services organizations and agencies if we set these folks up for success.	10/14/2021 11:53 AM
13	Percentage of low income and homeless residence in the city is increasing weekly, the current number of units of housing provided through the Housing Authority is no longer adequate. The city continues to cater to James Madison university students when it comes to housing priorities. There needs to be some incentive for private landlords and realty companies to Make housing available for lower income city residents	10/13/2021 3:20 PM
14	I would love to see funding made available to childcare centers to help retain staff and funding available to help programs grow and expand to be able to provide more childcare to families in the community.	10/13/2021 11:38 AM
15	The housing situation must be the highest priority- the creation of affordable and accessible rental units is the biggest need in our city currently.	10/13/2021 11:03 AM
16	the need for affordable accessible housing is great! The need for education and support re: parking requirements and Fair Housing for people with disabilities is critical to avoiding formal complaints	10/13/2021 10:26 AM
17	Way To Go provides important transportation assistance to low-income employed individuals and families that allows them to maintain employment and facilitate obtaining health care and carrying out other essential family activities.	10/4/2021 12:09 PM

Q8 In your opinion, what should be the highest priority needs in your municipality over the next five years?

Answered: 25 Skipped: 12

#	RESPONSES	DATE
1	Housing, Education, Community Economic Development	11/12/2021 1:32 PM
2	Stop approving (JMU) student housing. Focus on the welfare of the people who permanently live and work in the city. The homeless need help to get out of homelessness. Not just easier homelessness.	11/11/2021 5:20 PM
3	More low income housing and a permanent shelter for the homeless.	11/11/2021 3:13 AM
4	Housing..low income...mental health services and group homes	11/10/2021 4:02 PM
5	Affordable housing for non-students and families. That are not monopolized by the rental agency companies and their ridiculous application standards.	11/10/2021 3:43 PM
6	Climate Change Mitigation	11/10/2021 10:24 AM
7	Create a more competitive development environment with fewer barriers from staff.	11/10/2021 9:44 AM
8	Affordable housing, continued development of downtown urban core, walk/bike-ability	11/10/2021 8:04 AM
9	Building more rentals for the families and individuals that are not connected to the colleges locally. The cost for rentals is way too high and as a community, we need to work together to assess the average income and how much people can really afford vs what we are being forced to pay because we simply have no choice. These families will always struggle because of this.	11/10/2021 7:01 AM
10	Owner occupied housing, rent controlled housing, some way to have housing for families only (not college students). Fight state mandates that allow JMU to demolish housing for parking lots and/or buy up housing for itself.	11/10/2021 6:30 AM
11	Drug rehab and employment for the " homeless "	11/10/2021 5:22 AM
12	Affordable housing while also keeping building height down—our mountains matter. Stop building luxury student housing. Listen to the planning commission. Stop letting developers who don't even live here destroy our neighborhoods. (Ex, the injustice of the monstrosity approved for reservoir near woodland)	11/10/2021 4:47 AM
13	See number 7	10/14/2021 3:40 PM
14	Housing. Everyone needs it, but there is not enough for our growing population. College students are taking over, and it's leaving our year-round residents stranded with no where to go.	10/14/2021 1:48 PM
15	We are a town and gown city, and as a lifelong resident AND a college student, I am acutely aware of the tension. The growth of colleges in Harrisonburg has afforded this community a lot of advantages, but it should not be at the cost of this community. More concerted efforts into resources that benefit the entire community, but in particular "townies," are needed. Our city should strive to be more than "just" a college town, or the extended campus of JMU. We need to take care of the people that make this city function; those of us that live here (permanently), work here, pay taxes here, raise families here, volunteer here, donate money here, and play integral parts of the economic system and community here. As a townie, I need an affordable place to live that is not surrounded by college students, and the disruption they bring, or is trapped in the various traffic nightmares in Harrisonburg. I do not have a family system to pay my cost of living for me. I work full time in the city, go to school full time in the city, and live in the city and I can barely afford it and I'm doing better than many of my neighbors. There is just something wrong in that we are growing our city at the expense of some of our most vulnerable citizens.	10/14/2021 11:53 AM

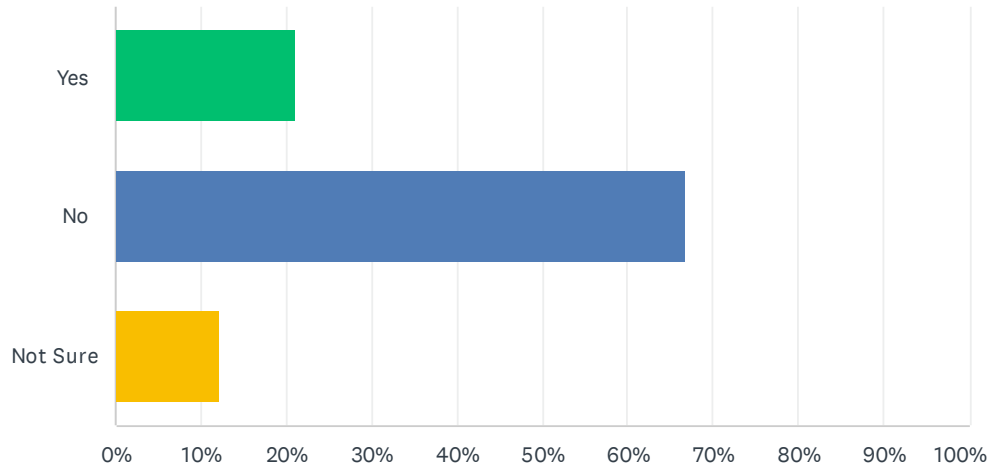
Five-Year Consolidated Plan + Analysis of Impediments to Fair Housing Choice Survey

SurveyMonkey

16	Addressing low barrier shelter needs for the increasing homeless population.	10/13/2021 3:20 PM
17	Adequate housing and childcare	10/13/2021 2:01 PM
18	Affordable, accessible housing for low and medium income individuals and families.	10/13/2021 11:04 AM
19	Housing, Childcare, improved public transit	10/13/2021 11:03 AM
20	Affordable, accessible housing, transportation, sidewalk access	10/13/2021 10:26 AM
21	Strengthening services and opportunities for our most vulnerable and at-risk community members, including affordable housing, mental health/substance use recovery, social connection, and jobs that pay a living wage and support a work/life balance.	10/6/2021 11:22 AM
22	Stormwater improvements	10/5/2021 2:53 PM
23	Sewer Extension Facilities	10/5/2021 12:58 PM
24	I believe transportation assistance for the low-income employed individuals should be included in the top 5 priorities.	10/4/2021 12:09 PM
25	Affordable housing	9/28/2021 4:56 PM

Q9 Have you ever felt that you were discriminated against when you were looking for housing anywhere in the City of Harrisonburg?

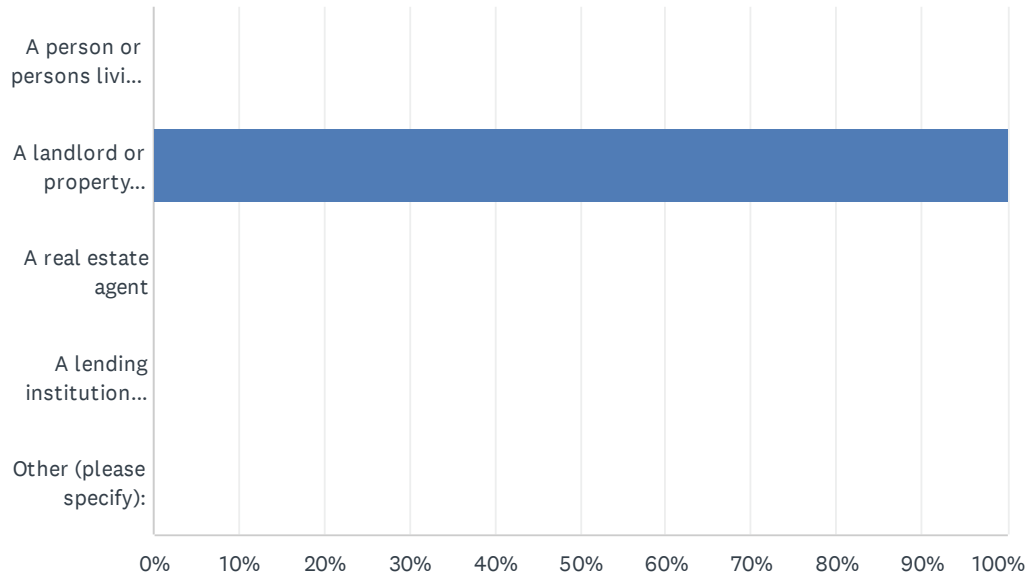
Answered: 33 Skipped: 4



ANSWER CHOICES	RESPONSES
Yes	21.21% 7
No	66.67% 22
Not Sure	12.12% 4
TOTAL	33

Q10 Which of the following best describes the person who may have discriminated against you?

Answered: 9 Skipped: 28

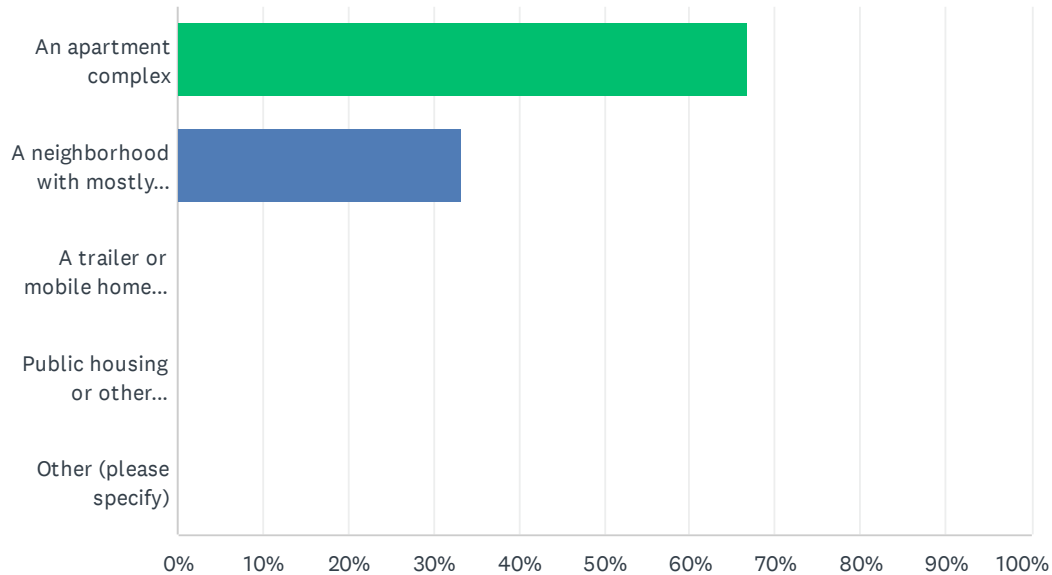


ANSWER CHOICES	RESPONSES
A person or persons living in the neighborhood	0.00% 0
A landlord or property manager	100.00% 9
A real estate agent	0.00% 0
A lending institution (bank, credit union, etc.)	0.00% 0
Other (please specify):	0.00% 0
TOTAL	9

#	OTHER (PLEASE SPECIFY):	DATE
	There are no responses.	

Q11 Which of the following best describes the location where the act of the discrimination may have occurred?

Answered: 9 Skipped: 28



ANSWER CHOICES	RESPONSES	
An apartment complex	66.67%	6
A neighborhood with mostly single family homes	33.33%	3
A trailer or mobile home park	0.00%	0
Public housing or other housing where your rent was only a portion of your income	0.00%	0
Other (please specify)	0.00%	0
TOTAL		9

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

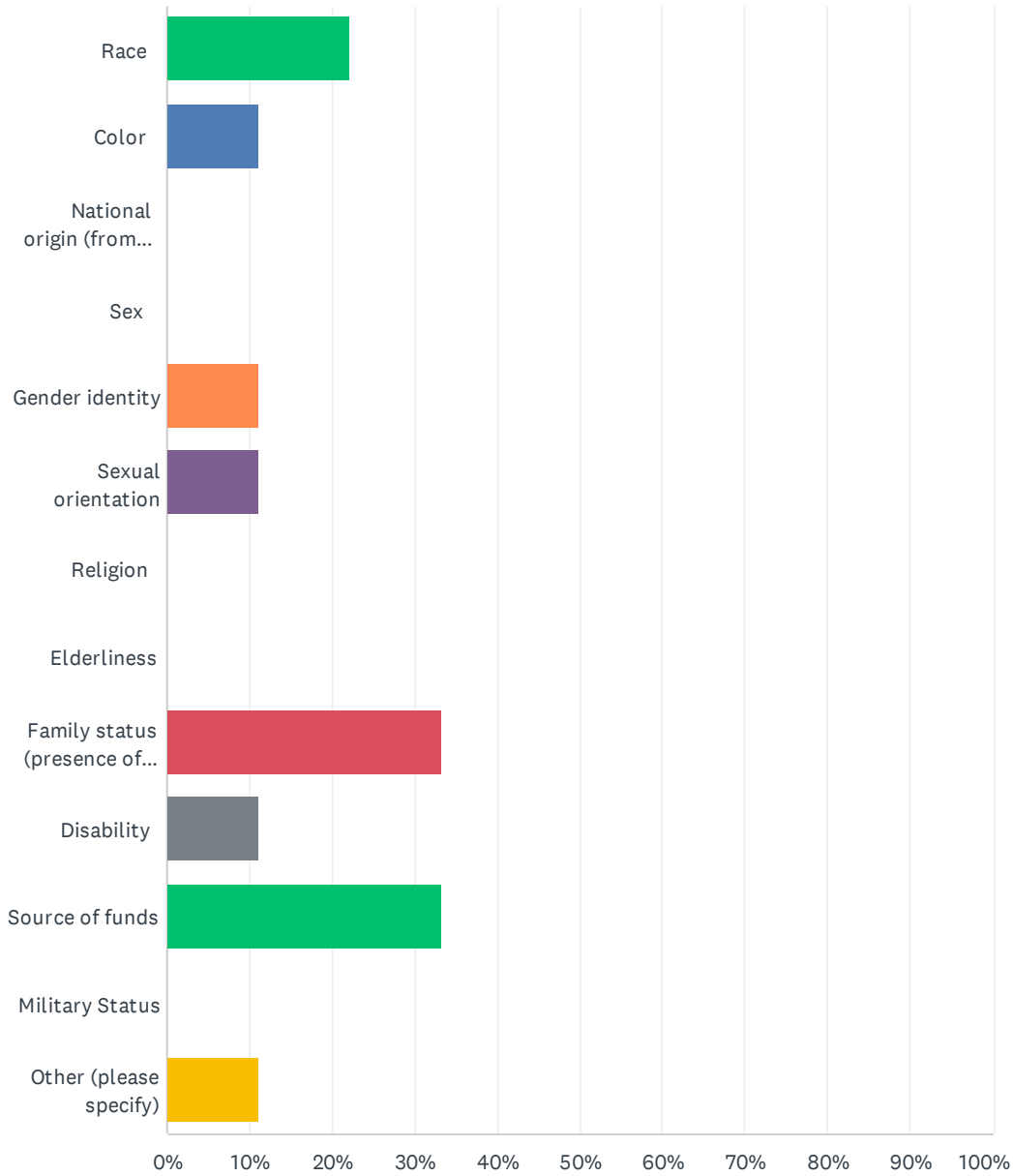
Q12 Please explain how you were discriminated against:

Answered: 10 Skipped: 27

#	RESPONSES	DATE
1	My husband and I were target by the landlord as we are an interracial couple. We were watched periodically by the landlord, and often harassed about paying rent. Not to mention, she only accepted cash or money order. She attempted an eviction against us alleging we were months behind on rent, but could not provide us with evidence when we asked to see the books as she never wrote receipts.	11/10/2021 3:46 PM
2	NA	11/10/2021 7:02 AM
3	This survey should ask for the demographic of the survey participant and include an "n/a" option if the participant did not experience discrimination.	11/10/2021 6:33 AM
4	marital status and socioeconomic status	11/10/2021 4:48 AM
5	The landlord at the time, continued to state that my then fiancé and I were not paying our rent on time, or were late. Keep in mind, this landlord would only accept cash or money order for rental payments. There was no way to track our payments except for our own bank accounts, etc. This landlord continued to harass us and ended up kicking us out and attempted the eviction process without proper notification of court dates, etc.	10/14/2021 1:51 PM
6	I have outstanding credit, no eviction history and great references, but a criminal history. I was denied consideration for an apartment based on that single box being checked	10/14/2021 11:55 AM
7	Landlords are expected to except vouchers when renting apartments, however they are able to get around having to except them by making the barriers to renting the apartment higher or more difficult	10/13/2021 3:22 PM
8	I'm gay. I went looking for rentals with my partner who presents straight. Landlords frequently assume that we are friends, roommates, or sisters. We've even been mistaken as mother and daughter. I am reluctant to come out and explain that we are a lesbian couple for fear of discrimination on the basis of sexual orientation, though my orientation is usually assumed from my gender expression and physical presentation. I have no evidence to show for it, but it feels like landlords or property managers are quick to dismiss or discount our application because they either assume we are friends/roommate/siblings and are not in as committed a relationship as perhaps a married man and woman might be OR if they perceive we are gay, they are less likely to rent to us because of implicit or explicit homophobia.	10/13/2021 11:11 AM
9	Won't take a Section 8 Voucher	10/13/2021 11:05 AM
10	Assisting individuals with disabilities the resistance to making modifications, we were able to remedy this though	10/13/2021 10:27 AM

Q13 On what basis do you believe you were discriminated against? Check all that apply:

Answered: 9 Skipped: 28

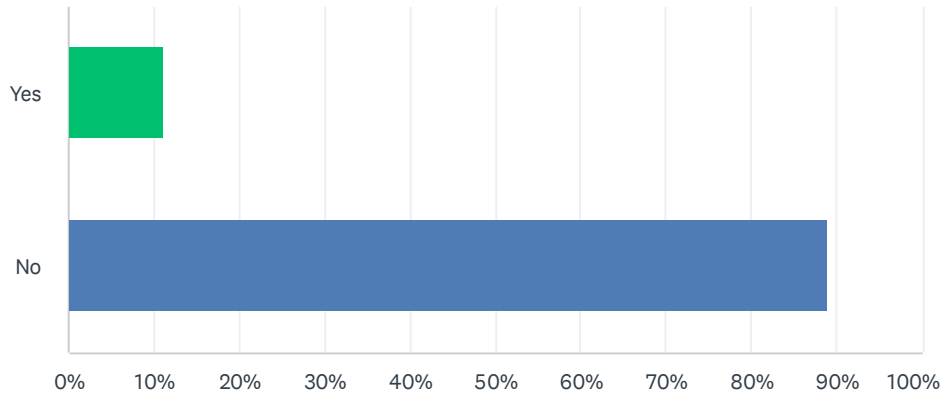


ANSWER CHOICES	RESPONSES	
Race	22.22%	2
Color	11.11%	1
National origin (from a country other than the United States)	0.00%	0
Sex	0.00%	0
Gender identity	11.11%	1
Sexual orientation	11.11%	1
Religion	0.00%	0
Elderliness	0.00%	0
Family status (presence of children)	33.33%	3
Disability	11.11%	1
Source of funds	33.33%	3
Military Status	0.00%	0
Other (please specify)	11.11%	1
Total Respondents: 9		

#	OTHER (PLEASE SPECIFY)	DATE
1	Criminal history. The fact that this is not an option speaks volumes	10/14/2021 11:55 AM

Q14 Did you report the incident of possible discrimination?

Answered: 9 Skipped: 28



ANSWER CHOICES	RESPONSES	
Yes	11.11%	1
No	88.89%	8
TOTAL		9

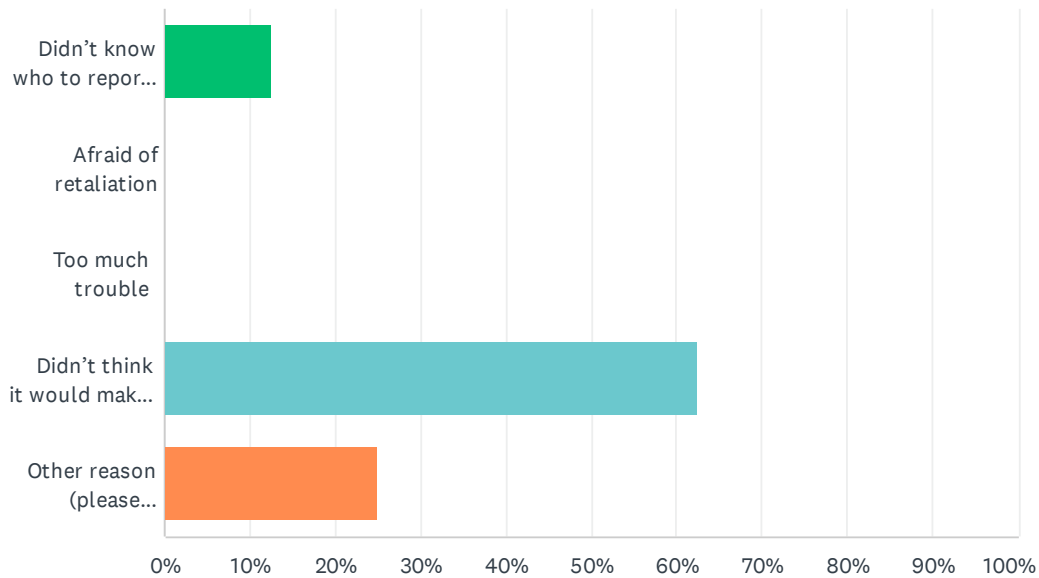
Q15 Who did you contact to report the incident of possible discrimination?

Answered: 1 Skipped: 36

#	RESPONSES	DATE
1	I went directly to the entity and worked through it in hopes of assisting the individual in avoiding needing to file a formal complaint	10/13/2021 10:32 AM

Q16 Why didn't you report the incident of possible discrimination?

Answered: 8 Skipped: 29

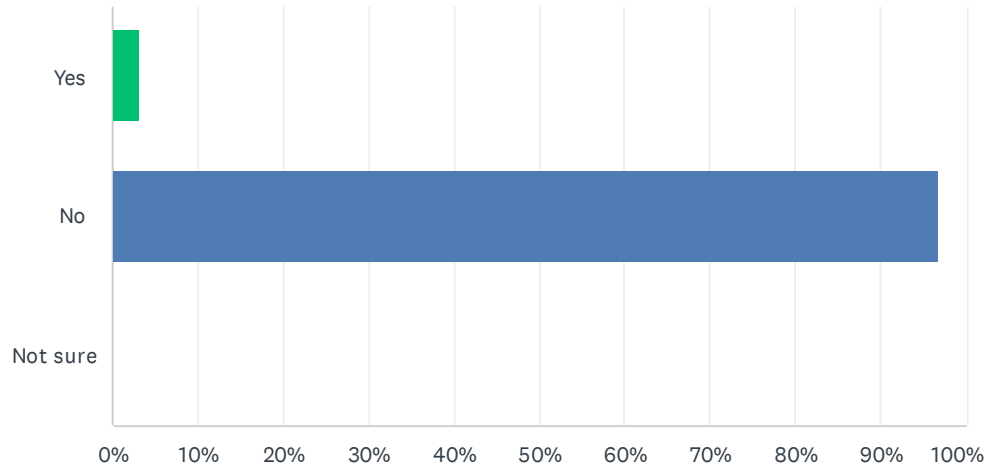


ANSWER CHOICES	RESPONSES
Didn't know who to report it to	12.50% 1
Afraid of retaliation	0.00% 0
Too much trouble	0.00% 0
Didn't think it would make a difference	62.50% 5
Other reason (please specify)	25.00% 2
TOTAL	8

#	OTHER REASON (PLEASE SPECIFY)	DATE
1	What's the point? Discrimination based on criminal history is legitimate and legal	10/14/2021 11:55 AM
2	I'd like to select multiple but cant. I didn't know who to report to, didn't think it would make a difference, didn't have evidence aside from a feeling and wasn't sure that was the reason for not getting the housing.	10/13/2021 11:12 AM

Q17 Have you ever been denied “reasonable accommodation” (flexibility) by a landlord related to housing?

Answered: 32 Skipped: 5



ANSWER CHOICES	RESPONSES	
Yes	3.13%	1
No	96.88%	31
Not sure	0.00%	0
TOTAL		32

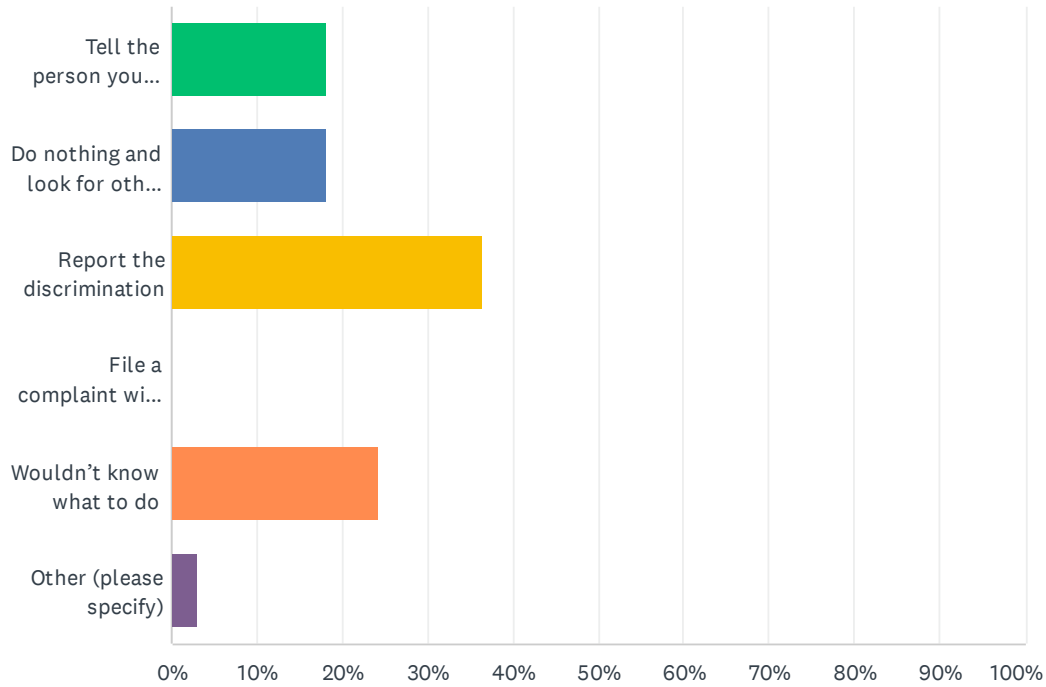
Q18 If you answered yes, what was your request?

Answered: 1 Skipped: 36

#	RESPONSES	DATE
1	We have needed to assist landlords in understanding Fair Housing and resolved their denials as they were educated. Parking and ramps have been what we have needed to educate and advocate for.	10/13/2021 10:33 AM

Q19 What would you do if you felt you were discriminated against while seeking housing?

Answered: 33 Skipped: 4



ANSWER CHOICES	RESPONSES	
Tell the person you believe they were discriminating against you	18.18%	6
Do nothing and look for other housing	18.18%	6
Report the discrimination	36.36%	12
File a complaint with a lawyer	0.00%	0
Wouldn't know what to do	24.24%	8
Other (please specify)	3.03%	1
TOTAL		33

#	OTHER (PLEASE SPECIFY)	DATE
1	If I was discriminated against because of a legally protected status, I would file a complaint	10/14/2021 11:56 AM

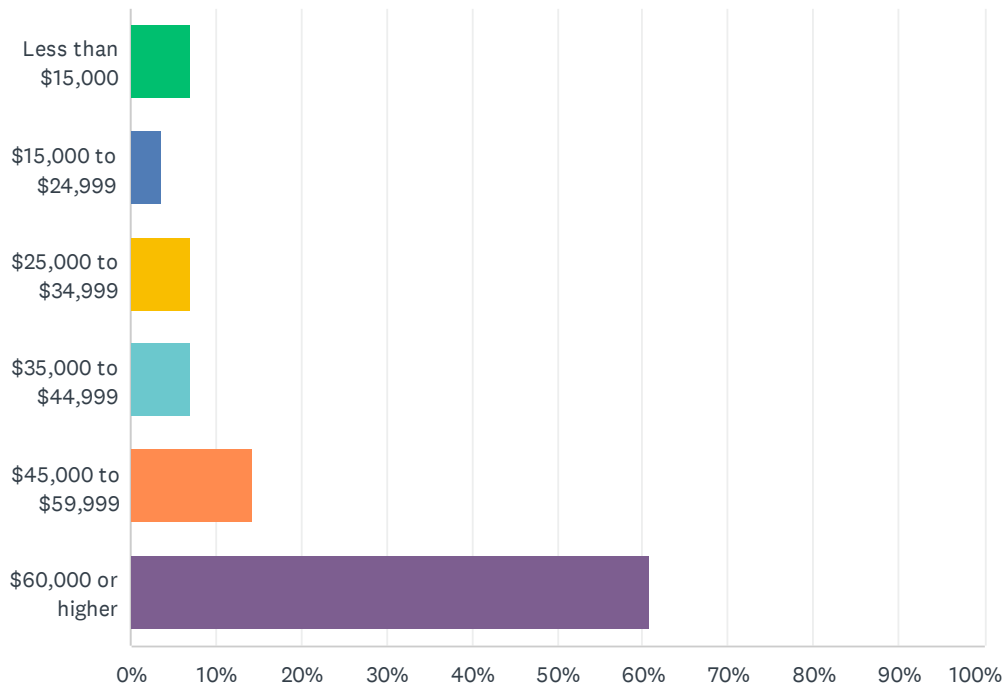
Q20 If you wanted to report the discrimination, who would you report it to?

Answered: 14 Skipped: 23

#	RESPONSES	DATE
1	A Fair Housing attorney	11/12/2021 1:34 PM
2	Not sure!	11/11/2021 11:35 AM
3	Not sure of department..but do research to do future action	11/10/2021 4:04 PM
4	City staff	11/10/2021 9:45 AM
5	HUD	11/10/2021 8:05 AM
6	I don't know	11/10/2021 7:03 AM
7	I don't know. I would have to google it.	11/10/2021 6:36 AM
8	Some one	11/10/2021 5:24 AM
9	No idea	11/10/2021 4:49 AM
10	The housing authority and/or a lawyer	10/14/2021 11:56 AM
11	A Lawyer?	10/13/2021 3:09 PM
12	I really have no idea. I might start with someone like Blue Ridge Legal Services, but I think I make too much money to qualify for their services. So, I would probably not do anything at all. Unless there was blatant discrimination with undeniable proof, I think it would be a waste of my time to attempt to do something about the discrimination. As a person with multiple minority identities, it's hard enough to live in the world, hold down a job and maintain stable housing. To add fighting a battle against real or perceived discrimination to my load would be the straw that breaks this camel's back. I wish there was more information, education, enforcement around non-discrimination with landlords and property managers so the onus isn't entirely on would-be renters to blow the whistle when it comes up.	10/13/2021 11:16 AM
13	Based on our role in the community we have resolved the issues locally. We have in the past assisted individuals in filing a Fair Housing complaint with the state.	10/13/2021 10:34 AM
14	State	10/5/2021 12:59 PM

Q21 What is your household's yearly income?

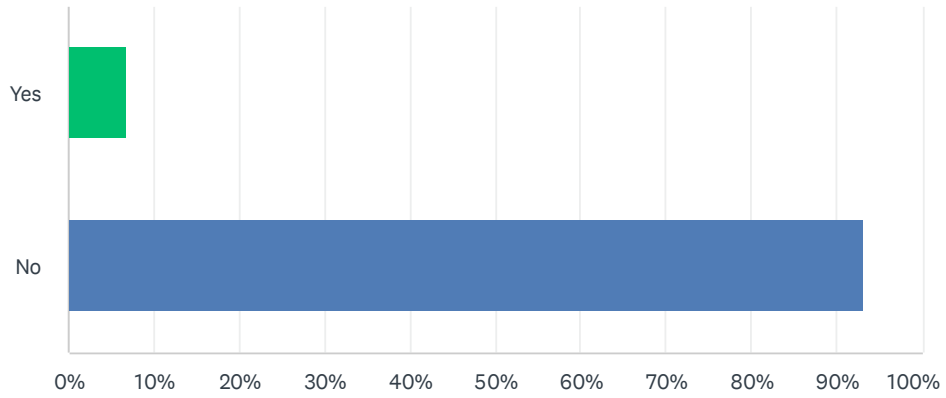
Answered: 28 Skipped: 9



ANSWER CHOICES	RESPONSES
Less than \$15,000	7.14% 2
\$15,000 to \$24,999	3.57% 1
\$25,000 to \$34,999	7.14% 2
\$35,000 to \$44,999	7.14% 2
\$45,000 to \$59,999	14.29% 4
\$60,000 or higher	60.71% 17
TOTAL	28

Q22 Are you Hispanic or Latinx?

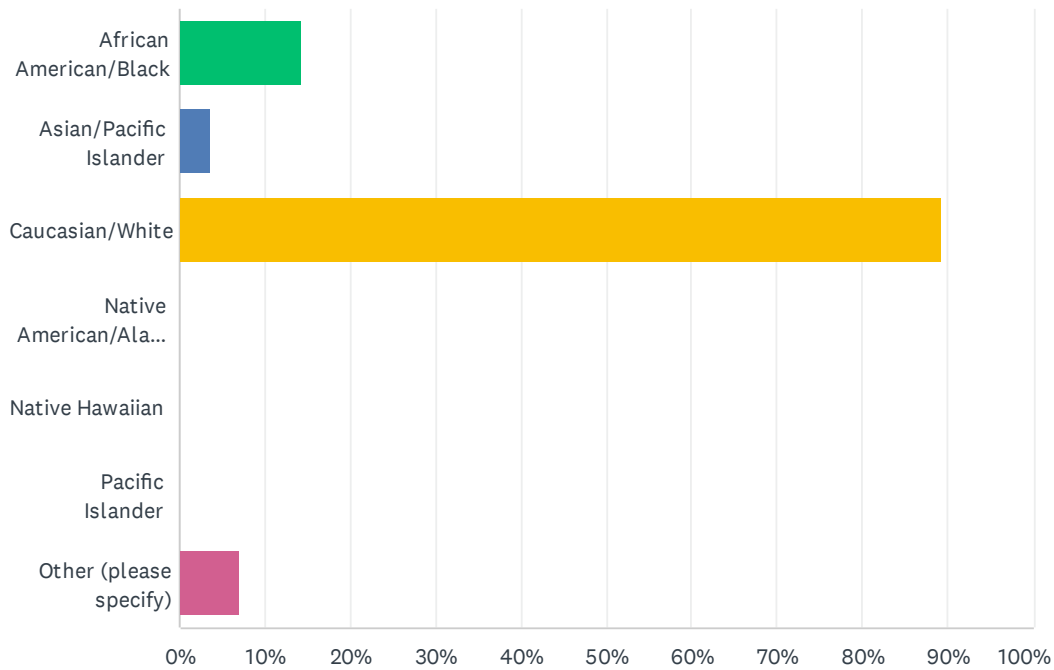
Answered: 29 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	6.90%	2
No	93.10%	27
TOTAL		29

Q23 What is your race? If you are multi-racial, please check all that apply.

Answered: 28 Skipped: 9

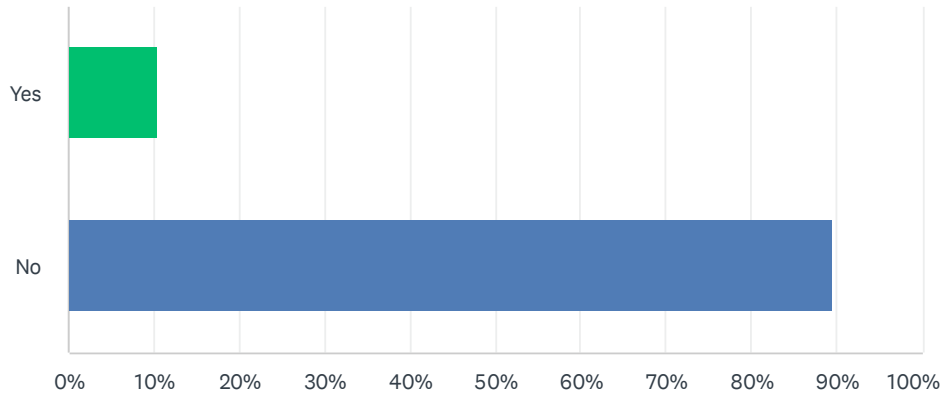


ANSWER CHOICES	RESPONSES
African American/Black	14.29% 4
Asian/Pacific Islander	3.57% 1
Caucasian/White	89.29% 25
Native American/Alaskan Native	0.00% 0
Native Hawaiian	0.00% 0
Pacific Islander	0.00% 0
Other (please specify)	7.14% 2
Total Respondents: 28	

#	OTHER (PLEASE SPECIFY)	DATE
1	middle eastern	11/13/2021 8:11 PM
2	Race and ethnicity are not interchangeable. I'm so frustrated people think they are. I'm white-appearing (race) but my mom was 100% Brazilian. Black people can be Black racially, but ethnically Bahamian (not African American). Please do better.	10/13/2021 2:03 PM

Q24 Does your household include a person with a disability?

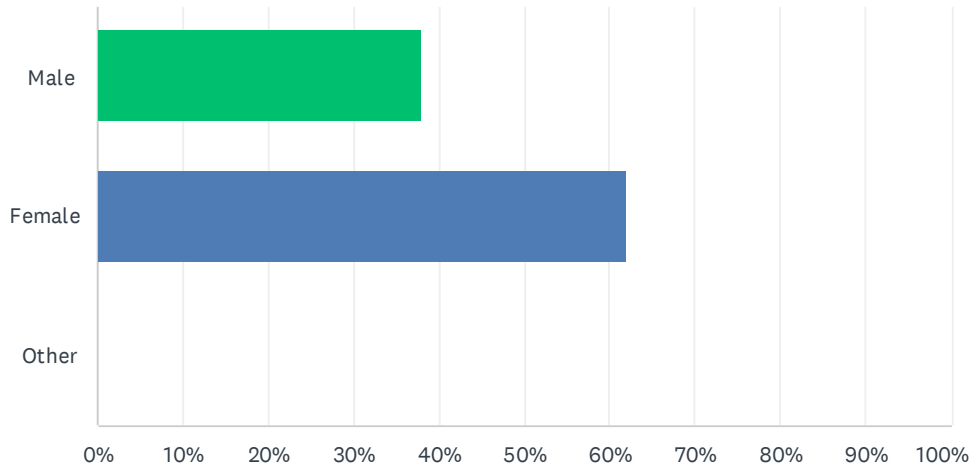
Answered: 29 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	10.34%	3
No	89.66%	26
TOTAL		29

Q25 What is your gender?

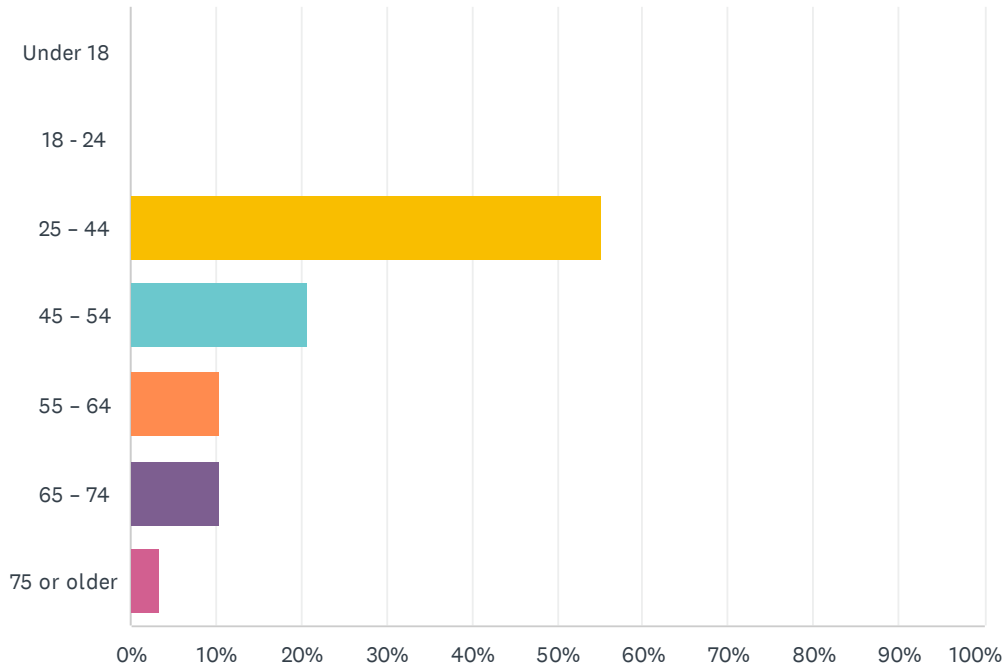
Answered: 29 Skipped: 8



ANSWER CHOICES	RESPONSES
Male	37.93% 11
Female	62.07% 18
Other	0.00% 0
TOTAL	29

Q26 What is your age?

Answered: 29 Skipped: 8



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18 - 24	0.00%	0
25 - 44	55.17%	16
45 - 54	20.69%	6
55 - 64	10.34%	3
65 - 74	10.34%	3
75 or older	3.45%	1
TOTAL		29



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2022-2026 Consolidated Plan, 2022 Annual Action Plan and Analysis of Impediments to Fair Housing Choice VAIL's Comments

VAIL is the Center for Independent Living serving the city of Harrisonburg Virginia. As a Center for Independent Living, as defined by the Rehabilitation Act, VAIL has a unique perspective and experience in regards to the community and accessibility. I am happy to answer any questions regarding our comments or any clarification that you may seek. As you are aware, VAIL provides an array of services to individuals with disabilities in the city of Harrisonburg.

In regards to the Consolidated Plan, Action Plan, and Fair Housing for the city of Harrisonburg:

- Harrisonburg has continued its efforts to evaluate, maintain, and refurbish the sidewalks within the city limits. Continued growth in this area is supported by VAIL. The lack of sidewalks and the lack of repair of sidewalks in some areas of the city creates access issues and concerns for individuals with disabilities.
- Affordable, accessible housing continues to be a challenge for individuals in the community to secure. Individuals desiring to move out of facilities are placed on waiting lists and unable to return to community living due to a lack of affordable accessible housing. VAIL has collaborated with the housing authority to look at ways for expanding housing as well as prioritizing needs but the lack of supply continues to be a barrier for individuals with disabilities.
- This past year, VAIL successfully assisted two rental companies in avoiding a Fair Housing Complaint. Both of these were avoided with some education both to the rental company and to the tenant for how to best proceed. The marking of parking spaces has been the largest issue we have seen in the past 2 years.
- Transportation for individuals with and without disabilities continues to be a challenge for many looking to secure employment as well as to get to appointments. While transportation is available, it is not always in the efficient manner needed or desired for commuting.
- Housing and Transportation once again were in the top 5 needs identified in VAILs annual community needs survey.

Thank you for the opportunity to share these thoughts and experiences.

Sincerely,

Gayl Brunk
Executive Director