City of Anniston
Assessment of Fair Housing

Draft: November 2017

Prepared for
The City of Anniston
And the Anniston HOME Consortium
by

MOSAiC
COMMUNITY PLANNING

Table of Contents

I. Cover Sheet

1. **Submission date:** January 4, 2018

2. **Submitter name:** City of Anniston

3. **Type of submission (e.g., single program participant, joint submission):** Single Participant

4. **Type of program participant(s) (e.g., consolidated plan participant, PHA):** Consolidated Plan Participant

5. **For PHAs, Jurisdiction in which the program participant is located:** N/A

6. **Submitter members (if applicable):** N/A

7. **Sole or lead submitter contact information:**
    a. **Name:** Cory Salley
    b. **Title:** City Manager (Interim)
    c. **Department:** Office of the City Manager
    d. **Street address:** 1128 Gurnee Avenue
    e. **City:** Anniston
    f. **State:** Alabama
    g. **Zip code:** 36201

8. **Period covered by this assessment:** October 1, 2018 – September 30, 2023

9. **Initial, amended, or renewal AFH:** Initial

10. **To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;**

11. **The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.**

    All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

                                                    (Signature)   (date)

12. **Departmental acceptance or non-acceptance:**

                                                    (Signature)   (date)

Comments

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

The City of Anniston receives funds from the United States Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG), and Home Investment Partnerships Program (HOME). As a participant in these programs, the City is required to complete a fair housing study known as an Assessment of Fair Housing (AFH). This AFH covers the City of Anniston as well as adjacent jurisdictions that participate with Anniston as members of the City's HOME Consortium. These Consortium members include Calhoun County (excluding Oxford and Ohatchee), Hobson City, Jacksonville, Weaver and Piedmont.

The AFH studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AFH proposes strategies to overcome the identified fair housing issues.

Public input from local residents and other stakeholders was a key component of the AFH research and the City used a variety of approaches to achieve meaningful engagement with the community on the topics listed above. The City hosted two fair housing workshops for the general public with a total of 15 attendees. A community-wide survey on fair housing received 203 responses. The workshops and survey were advertised with an ad in the *Anniston Star*, announcements on the City's Facebook page and Community Development department webpage, and flyers posted in government buildings and distributed through stakeholder networks. The survey was also distributed via email to all city employees and residents who previously participated in City of Anniston planning initiatives. Hard copies were available at the ACTS multimodal station.

Representatives from 15 housing and/or community development-related groups participated in stakeholder interviews. They represented a variety of relevant viewpoints, including elected officials, planning staff, regional transportation staff, nonprofit community development organizations, homeless service providers, low/moderate income neighborhoods, the Anniston Housing Authority, public schools, employment services, and the Anniston-Calhoun County NAACP.

This Executive Summary provides a brief overview of the study's key findings, followed by an outline of fair housing goals and related actions.

Demographics

The city of Anniston has a population of about 23,000 residents, of which the largest share are non-Latino African Americans (48.15%), closely followed by non-Latino whites (45.95%) (Table 1). Just over 3% of the population is Latino, while Native Americans, Asians/Pacific Islanders, people of two

or more races, and people of other races each make up less than 2% of the population. Racial and ethnic composition data for the Consortium and the greater Anniston-Oxford-Jacksonville region shows that both are less diverse than the city. Of the HOME Consortium's nearly 123,000 residents, 74.16% are non-Latino whites. Non-Latino Black residents make up one-fifth of the population (19.94%), and Latinos comprise 3.21%.

Current estimates show that only 1.62% of Anniston's population is foreign-born, and 1.38% of residents have limited English proficiency (LEP). Nearly one-quarter of city of Anniston residents have a disability (24.55%), with ambulatory difficulties (i.e., serious difficulty walking or climbing stairs) being most common. The share of families with children (defined as households with two or more people related by birth, marriage, or adoption) fell steadily in the city since 1990, from 3,622 families with children to 2,167.

Segregation and Integration

As of 2010, segregation levels within the city were moderate among white and non-white residents and white and Black residents Anniston segregation levels were considerably lower between white and Latino residents and white and Asian/Pacific Islander residents.

The city's areas of greatest integration include parts of the Golden Springs area in southeastern Anniston, and the neighborhoods that lie east of downtown and surround the Regional Medical Center and Stringfellow Memorial Hospital. Segregated areas include West Anniston, Randolph Park, neighborhoods south of Blue Mountain Road including the Norwood Park area, and Glendale, where more than 80% of residents are African American. White residents make up more than 80% of the population in the areas to the southeast of the Anniston Country Club, including neighborhoods along Hathaway Heights Road, Henry Road, and Choccolocco Road.

Regionally, Anniston, Jacksonville, Saks, Hobson City, and parts of Oxford are the most racially and ethnically diverse. Unincorporated Calhoun County and Ohatchee are more segregated, with the large majority of their population (more than 90%) being white.

Over the last two decades, Anniston's and the region's population became more diverse, while dissimilarity indices between all racial and ethnic groups declined.

Racially & Ethnically Concentrated Areas of Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more.

Currently, the city of Anniston contains three contiguous R/ECAP census tracts that lie along the rail line running adjacent to Front Street and Grove Street. These R/ECAPs cover much of the West Anniston neighborhood, including the primary areas impacted by PCB contamination by Monsanto through the 1970s. While there are no R/ECAPs in the Anniston HOME Consortium or region other than those in Anniston, small portions of Anniston's R/ECAP tracts extend beyond the city limits, including about 100 residents of Calhoun County outside of Anniston.

African Americans are 4.7 times as likely as whites to live in an R/ECAP and 3.7 times as likely as Latinos. Additionally, R/ECAP households are considerably more likely to have female householders. Nearly two-thirds of households in R/ECAP census tracts have a female householder (65.77%). This share is well above that of the city (46.43%) and region (34.15%).

Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors such as access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. This report provides analysis of the index scores on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health.

The largest disparities by race in access to areas of opportunity are related to labor market participation and poverty. African American residents of Anniston are approximately three times as likely to live in neighborhoods with low levels of labor market participation and high levels of poverty than are Asian residents, whose access to these measures of opportunity are greatest. Disparities narrow between these groups when evaluating the HOME Consortium area or the Anniston region as a whole. Access to proficient schools and healthy air quality is uniformly low for all racial and ethnic groups living in Anniston, but outside the city, white residents generally lived in neighborhoods with access to better schools and air quality than other groups, particularly African American residents.

Disproportionate Housing Needs

The AFH analyzes four unique housing needs: cost burden, overcrowding, dwellings lacking complete kitchen facilities, and dwellings lacking complete plumbing facilities. In the city of Anniston, there are 3,255 households with one or more of these housing needs, constituting about one-third (33.89%) of all Anniston households. Levels of need within the Anniston HOME Consortium and the Anniston-Oxford-Jacksonville region are similar but slightly lower. Just under 30% of households in both geographies have a housing need. African American and other non-Latino households in Anniston typically experience housing problems, severe housing problems, and severe cost burdens at rates that are disproportionately higher than white households in the city. In the HOME Consortium, disproportionate needs and severe cost burdens are more common, impacting African Americans, Native Americans, and other non-Latino households.

Publicly Supported Housing

Of the five types of publicly supported housing, public housing units are the most likely to be found in R/ECAPs. Public housing owned by the Hobson City, Jacksonville, and Piedmont housing authorities is not located in R/ECAPs, as the only three tracts in the study area with such a designation are all within Anniston. Virtually no Housing Choice Vouchers are used in these tracts and are instead clustered in the Joyview Heights, Randolph Park, and McClellan neighborhoods within Anniston and also in Jacksonville. These tracts are relatively diverse in terms of race and ethnicity, with the non-white share of the population in most between 24% and 35%. Low-Income Housing Tax Credit units are generally found in these same areas while Project-Based Section 8 units

are primarily located in downtown Anniston between Noble Street and Quintard Avenue and outside Anniston in Hobson City and Oxford.

Disability and Access

In the city of Anniston, an estimated 5,134 persons over the age of 5 have a disability, representing 24.76% of the total population. People aged 18 to 64 have the highest disability rate at 13.92% and the rate for seniors (persons age 65 and older) is 9.67%. In contrast, barely one in 100 children between the ages of 5 and 17 are disabled. Within the region, 20% of the population over age 5 has a disability. For the population 18 and over, disability rates are slightly lower in the Consortium area and the Anniston region compared to the city. This may reflect that people with disabilities live in Anniston because it has better access to transit and other services than surrounding communities.

Fair Housing Enforcement and Outreach

The Alabama Fair Housing Law mirrors the federal Fair Housing Act in terms of its protections and the grievance and enforcement process. As with the FHA, the state law prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the FHA.

The Anniston region has two primary sources of fair housing information, outreach, and enforcement: the Fair Housing Center of Northern Alabama (FHCNA) and the U.S. Department of Housing and Urban Development. The FHCNA is a Birmingham-based nonprofit fair housing advocacy organization that has been awarded grant funding under HUD's Fair Housing Initiatives Program. These funds help nonprofit organizations carry out investigations and other enforcement activities to prevent or eliminate discriminatory housing practices. Additionally, HUD – through its Atlanta Regional Office of Fair Housing and Equal Opportunity and Alabama Field Office – is a significant source of capacity for fair housing initiatives in the region.

Fair Housing Goals

The City of Anniston identified the following fair housing goals based on the AFH research and findings. The goals will direct strategies to alleviate the fair housing issues and contributing factors described above.

1. **Implement place-based community investment strategies to increase opportunity measures, particularly in R/ECAPs:** The R/ECAP neighborhoods of west Anniston will require significant and prolonged investment in order to be revitalized into communities of choice for Anniston residents. Working together with partners including the Anniston Housing Authority and others, the City will strive for focused, impactful investment of CDBG, HOME, and other resources in west Anniston with a goal of priming the community for future private sector investment.

2. **Foster opportunities for greater mobility of low- and moderate-income residents:** Anniston's low-income residents tend to concentrate in areas of poverty and with low levels of opportunity. Understanding that not all residents wish to leave their homes and neighbors

behind to move to other areas that may have greater opportunities and amenities, those residents willing to make such a move should be encouraged and supported through the transition. The City, together with the Anniston Housing Authority, should study models for mobility counseling programs and should designate an existing staff person or office as a coordinator for mobility. This designee would be a coordinator to assist residents with evaluating their options, planning for a move, and becoming established in a new community of choice.

3. **Fund a dedicated CDBG sub-grant to support local fair housing enforcement and education:** The Anniston region lacks sufficient enforcement and education resources and capacity to ensure fair housing for its residents. To increase the resources available locally, Anniston will begin annually setting aside a portion of its CDBG funds to be sub-granted to a responsive, local organization that will implement a program of education and awareness. Specifically, the grant recipient should focus on educating landlords about their fair housing act responsibilities, the public on how to recognize discrimination and how to file a complaint. Within the first three years of funding the fair housing sub-grant, a program to test the real estate sales and lending markets for discrimination should be considered for inclusion in the grantee's scope of work.

4. **Review and amend City ordinances as appropriate to further fair housing choice:** Several provisions of Anniston's zoning code are recommended for review and revision to be more compliant with the Fair Housing Act and the further fair housing choice: 1) group homes should not face greater restrictions than traditional single-family homes with the same number of occupants; 2) a reasonable accommodation ordinance should be adopted to include specifics regarding the form that a request for accommodation should take; the time frame within which the reviewing authority must make a decision; the form that a decision must take and whether conditions may be attached; and how to appeal a decision; and 3) the family definition in the City's zoning ordinance should be amended to explicitly include relationships based on adoption or foster/legal guardianship.

5. **Support home accessibility modifications for people with disabilities:** Approximately one in four residents of Anniston has some type of disability, yet available accessible housing units are scarce. The City should annually consider reserving a portion of its CDBG funds to be granted to an organization or organizations that will assist residents with needed home modifications to make their homes more accessible. These modifications could include ramps, grab bars, door widening, and other related work as dictated by the needs of the beneficiary.

6. **Continue progress toward mitigation of the effects of environmental contamination in west Anniston:** Contamination of Anniston's municipal water source with TCE, though mitigated by added technology that removes pollutants from the water, has potential to affect all of Anniston's municipal water customers, an effect that would impact all residents regardless of their protected class status. However, other soil and water contamination issues primarily impact African American residents. The Monsanto site is located in an R/ECAP with a population that is 64.15% African American. In addition to heightened exposure to toxins in the environment, these primarily African American residents also bear the brunt of the

blight and economic decline facing west Anniston as a result of the contamination. In order for West Anniston to be revitalized and to attract residents, economic development, and private investment, environmental contamination needs to be controlled and progress should continue toward mitigating its effects.

III. Community Participation Process

1. **Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.**

The City of Anniston used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders in Anniston and the Calhoun County region.

Fair Housing Workshops

The City held two fair housing workshops open to the general public in August 2017. Each workshop began with a short presentation providing an overview of the Assessment of Fair Housing, related fair housing law, how to access HUD-provided AFH data and maps, and ways to provide input for the study. The remainder of the workshops were devoted to an interactive discussion of fair housing, neighborhood conditions, and community resources in Anniston and Calhoun County. A total of 15 attendees came to the workshops. Meeting dates, times, and locations are shown below:

<div align="center">

Wednesday, August 23, 2017 at 6:00 pm
City Meeting Center, Room A
1615 Noble Street
Anniston, AL 36201

Thursday, August 24, 2017 at 6:00 pm
Anniston Housing Authority
500 Glen Addie Avenue
Anniston, AL 36202

</div>

Stakeholder Interviews

During the week of August 21, 2017 individual and small group stakeholder interviews were held at the City Meeting Center in Anniston. For people unable to attend in-person interviews, follow-up via telephone was conducted the week of August 28. Stakeholders were identified by City of Anniston staff. They represented a variety of relevant viewpoints, including elected officials, the Anniston Housing Authority, other housing developers, mortgage lenders, nonprofit organizations, homeless service providers and Continuum of Care representatives, neighborhood organizations representing low/moderate income areas, organizations representing African American and Muslim residents, school system representatives, regional transportation planners, and local planning and career center staff.

Interview invitations were made by email and/or phone to 26 stakeholders. Fifteen people participated in an interview, and their organizations are listed in response to the next question in this section. A summary of input received from interviewees is provided in response to question four.

Community Survey

The third method for obtaining community input was a 25-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in both English and Spanish from August 15 through October 13, 2017. A total of 203 respondents took the survey. A summary of results is provided in response to question four of this section.

Community Engagement Advertisement

A variety of techniques were used to advertise the fair housing workshops and community survey to as broad an audience as possible. They included:

- An ad placed in the *Anniston Star* on August 10, 2017;
- Online advertisement on the City of Anniston's Community Development page and the City's Facebook page;
- Flyers in English and Spanish posted in government buildings and at the Housing Authority, and distributed to stakeholders via email;
- Dissemination of the online survey link to City of Anniston employees and people who participated in previous citywide planning efforts; and
- Hard copies of the survey made available at ACTS' (Areawide Community Transportation System's) multimodal station.

To facilitate participation by people with limited English proficiency, flyers and surveys were available in English and Spanish. Flyers contained instructions for participants needing any special accommodations to participate in the workshops. Both workshops were located in or adjacent to R/ECAPs, and the Thursday meeting was held at Glen Addie Homes, a public housing development.

Public Comment Period

The City will hold a 30-day public comment period to receive input on the draft AFH from November 1 through November 30, 2017. Comments received during the public comment period will be considered in revising the document for submission to HUD, and will be appended to the final report.

2. Provide a list of organizations consulted during the community participation process.

Representatives of the following organizations were consulted in the development of this AFH. Consultations may have occurred in an interview, participation at a public meeting or event, or other correspondence:

- Anniston Career Center
- Anniston City Schools
- Anniston Housing Authority
- Anniston-Calhoun County NAACP
- City of Anniston City Council
- City of Anniston City Planning
- East Alabama Regional Planning and Development Commission

- Interfaith Ministries
- Northeast Alabama Development Corporation
- West Anniston Foundation
- Rocky Hollow Neighborhood Association
- The Right Place

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

Over 200 people participated in the community engagement process used to develop this AFH. A total of 15 attended one of the two fair housing workshops. While attendance was modest, conversation in these settings was insightful and constructive, and participants generally showed an understanding of and engagement with the discussion topics. Participation was strongest at the meeting held at the City Meeting Center, likely because it began shortly after a City Council meeting held in an adjacent room.

Fifteen (15) community stakeholders were interviewed, representing a variety of viewpoints, from professional planning staff and elected officials to neighborhood organizations and non-profits. Overall, most local stakeholders were willing to participate in the interview process; several of those that declined to participate explained that they did not feel they were familiar enough with housing, fair housing, or other aspects of community development in Anniston to provide relevant answers to interview questions.

A fair housing survey was completed by 203 respondents. The survey was advertised in the *Anniston Star*, online on the City's Community Development department webpage and Facebook page, via flyers distributed at meetings and through stakeholder networks, and via email to City employees and residents who participated in other Anniston planning efforts. Hard copies of the survey were also available at ACTS multimodal station. The survey was more successful at generating input from Anniston residents than the fair housing workshops, likely because it required less of a time investment than attending a meeting.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

For the community participation process, the consulting team developed a standard question set for use in public workshops and interviews. Listed below are each of the questions along with summarized comments from interview participants and meeting attendees. These comments do not necessarily reflect the view of the City of Anniston or the Anniston Housing Authority. All comments received were considered in the development of this AFH.

Fair Housing Workshops

1) What are Anniston's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
   - Golden Springs because it is convenient between Anniston and Oxford
   - Main Street is attractive because of lofts and nightlife
   - 10th Street area/LaGarde Apartments because they are near the high school and the country club and in a safe, low crime area

- Joyview Heights, Glendale, Sunset Drive, and Randolph Park because these are areas where professionals live; During segregation, these were areas where Black residents could live that were nice and close to good schools

2) Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income or savings that might limit housing choices?
   - If people are not using a voucher, they would have the same housing choices; People with a housing choice voucher would be limited, especially looking for housing in Golden Springs or Oxford
   - The cost of moving can be a challenge for many people

3) Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
   - Yes, there is segregation due to people's housing choices; There has been so much deterioration in West Anniston that many people don't want to move back so it will likely stay segregated
   - Yes, the city is segregated east to west with the railroad serving as the dividing line; In part this is because people are comfortable living with people like them and the community takes care of one another
   - There have been some racial changes in the city, for example, the area around Anniston High School used to be predominately white and now is mostly African American
   - Often people's only asset is their home so they don't want to give it up to move somewhere new
   - HUD is encouraging housing authorities to deconcentrate public housing, so redevelopment of Cooper Homes would help scatter public housing and lessen segregation

4) Are you aware of any housing discrimination that occurs in the region? What are some things that can be done to overcome discrimination?
   - At one meeting, no attendees were aware of any housing discrimination
   - At one meeting, attendees responded that there is steering by real estate agents and instances in some areas where housing may be available but sellers won't sell to people because of their race; Attendees also noted that banks won't finance loans in West Anniston and Joyview Heights which depresses property values

5) Is there an adequate supply of housing that is accessible to people with disabilities?
   - There is not enough housing for people with disabilities; Many older properties would have to be rebuilt to be made accessible
   - There are some properties with accessible units, but probably only about four units per property; There's not enough new apartments being built to meet accessibility needs
   - Unless the Housing Authority provides housing to this population, the private sector does not, and it would require high rents (or public subsidy) to do so
   - There is one apartment complex in the city with units for the hearing impaired, but generally there is not a lot of accessible housing in the market
   - A central clearinghouse for accessible apartments would be helpful

6) What types of fair housing services are offered in the area? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
   - Anniston Housing Authority has referral forms for complaints of discrimination and passes them on to HUD
   - One meeting attendee has heard many people say they do not know where to file a fair housing complaint; When she asked at a City Council meeting, they referred her to Legal Aid and a senior citizen advocate
   - Anniston High School's parent advocate is good about advertising fair housing
   - Low Income Housing Tax Credit applications usually build in fair housing seminars or other similar programs; Tax credit projects are funded in Anniston about once every one to two years

7) Are public resources invested in evenly throughout all neighborhoods?
   - Some parts of the city are left behind
   - The City is not sharing the wealth with certain parts of town; West Anniston and South Anniston, which are primarily African American, have roads of less quality and no new buildings
   - While roads in East Anniston may also be in bad shape, they are not as bad as those in West Anniston
   - The public works department handles all work orders; There may be more numerous orders called in by people in East Anniston neighborhoods than West, but everything brought to the City's attention gets done
   - West Anniston tends to have more advocacy and is more likely to be notified about what's going on in the community than some other neighborhoods
   - Fire stations are well distributed throughout the city and the department has good reputation with residents; General feeling that the fire department treats all residents with respect

8) Is there anything we haven't discussed that you feel is important to our research?
   - There have been complaints by multiple residents about the management of a privately-owned apartment complex since the management was transferred from the Anniston Housing Authority

Stakeholder Interviews

1) What do you believe are the greatest fair housing needs or affordable housing needs in the community? Are there parts of the city or county that are particularly affected?
   - Substandard housing is the greatest need; Leaks and poor insulation lead to high utility bills
   - People living in dilapidated housing need help; CDBG money should be used to help homeowners make repairs and address other housing needs
   - More support for code enforcement
   - Affordable rental housing
   - Need to build more housing, including public housing, in areas outside of the city limits
   - Needs in West Anniston
     o Address dilapidated housing; Some homes could be refurbished, others are abandoned and could be taken down

- o   Community redevelopment; While some people have left the area, others are still there and deserve the same access to amenities
  - More employment opportunities would help with mobility and help people move out of subsidized housing; Public transit needs to be expanded with routes to Oxford, Honda, and Honeywell
  - Low incomes and unemployment make it difficult for people to secure mortgage loans
  - Issue related to banks turning down mortgage loan applications in West Anniston; Forces sellers to stay in their home or to accept lower, cash offers; Depresses property values in the neighborhood
  - Need for mixed-income housing, senior housing, and housing for young adults
  - Neighborhoods with a mix of housing types, tenures, and price points
  - Difficulty finding a place to rent with a voucher
  - Homeless population have difficulty making security deposit and utility deposits even if they can afford rent; People on disability often do not have enough income to afford housing
  - Safe neighborhoods with affordable housing

2) What are Anniston's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
   - Golden Springs, Glendale, Jacksonville, and Oxford
   - East Anniston and McClellan are attractive with access to golf courses, hospitals, better homes, and safer neighborhoods, but rents and sales prices are higher; Income, credit scores, and poor renter histories are barriers to living there.
   - Greenbriar, Fort McClellan, and Saks
   - Saks or Piedmont in the county; Golden Springs in Anniston because it has access to grocery stores, pharmacies, nice parks, tennis courts, new stores, and good schools
   - The eastside of Anniston was prominent but is changing a little
   - The Ladiga Trail, which will run from the center of Anniston to the base of the Appalachian Mountains in West Anniston, will be an attractive area
   - For people using public transit, being close to downtown is important; quite a few attractive areas near downtown
   - West Anniston has community centers and parks but not private development
   - What attracts people is economic development, jobs, retail, etc.; Council should be working towards these things
   - People are willing to move to a new neighborhood for good, quality housing
   - The region's areas of greatest opportunity are all outside of Anniston, although many African American residents in Anniston have great pride in the city's public schools
   - Anniston schools are not as bad as people say, particularly the elementary and middle schools
   - People often don't leave low opportunity neighborhoods because of family ties, their churches, and racial differences that may make them feel uncomfortable in other areas
   - Lack of education limits employment, which in turn affects employment and income, and limits mobility

3) Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income or savings that might limit housing choices?

- Three interviewees said there are no differences in access to housing by race, disability, or other characteristics
- Four interviewees said that economics and income are the factor that influences housing options
- One interviewee said they did not know
- A Black person with the same income as a white person would not have the same housing choices and would be less likely to get a home loan; Bank employees are not diverse
- Source of income can be an issue, since some landlords do not accept vouchers
- May be some discrimination in the rental and homeownership markets based on race and familial status
- It would depend on what part of town you are trying to move to; Realtors steer people and may tell white buyers not to look in West Anniston or tell buyers with children to look outside of the city
- The school system plays a big role in housing choice, with many households choosing to live outside the city so their children can attend public schools in the county; However, there are also many African American residents in Anniston who take a lot of pride in the local school system

4) Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
   - Five interviewees said that the city is segregated, and that West Anniston is mostly African American and East Anniston is a mix of races and ethnicities
   - When factories in West Anniston closed, white residents moved out and the composition of the schools changed, which further increased white flight
   - Yes, often when Black residents move into a neighborhood, white residents move out; There has been a lot of white flight in Anniston
   - The school system is self-segregated based on where people send their children to school
   - The city is not as segregated for people who have financial resources, but wealth does impact where you live
   - Golden Springs is one of the most diverse areas, with affordable housing, middle-class neighborhoods, and schools nearby
   - Other diverse areas include Rocky Hollow, areas around the country club, and areas around Quintard Avenue near Oxford
   - Not really segregated anymore, and people can live anywhere in the city or county
   - Some neighborhoods are more diverse than others; Some segregation is by choice and there are some people in the city who would like to see more diversity and others that would not
   - Some African Americans in West Anniston are not able to move or chose to continue living there because they have lived there all their lives
   - After the Monsanto settlement, some Black residents in West Anniston relocated to the east side of the city
   - It is the perception that the city is segregated, and contamination in West Anniston keeps many people from wanting to live in that area
   - Muslims are well-integrated throughout the community
   - There are very few Jewish people in Anniston, although there is a historic temple in the city

5) Are you aware of any housing discrimination that occurs in the region? What are some things that can be done to overcome discrimination?
   - Agents and property managers push people to certain areas
   - Discrimination in the rental market
   - Difficulty getting home loans in West Anniston, possibly due to environmental contaminants; Without buyers, residents in West Anniston are not able to sell their homes if they want to move
   - Difficulties obtaining a job (possibly due to drug tests, background checks, or poor interview skills) can impact ability to afford housing
   - There are probably some Realtors who are prejudiced but interviewee has not seen any discrimination
   - No, the real estate community is typically open and listens to clients; People often want to look outside of the city because of schools
   - Seven other interviewees responded that they were not aware of any housing discrimination in the region

6) Is there an adequate supply of housing that is accessible to people with disabilities?
   - Home rehabilitation costs for elderly residents can quickly get out of control
   - Four interviewees did not know whether the accessible housing supply is adequate
   - Four interviewees said most single-family homes are not accessible but could be equipped with a ramp
   - Often churches will help build ramps on people's homes when they need them
   - Housing with supportive services for people with mental disabilities is a need
   - Important for people with disabilities to live in homes and neighborhoods that are safe
   - Senior center may have information about housing for elderly people with disabilities
   - Yes, the City has an ADA plan and new housing has to meet certain accessibility standards

7) What types of fair housing services are offered in the area? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
   - Two interviewees would refer someone with a housing discrimination complaint to the Legal Aid Society
   - Three interviewees would refer someone with a housing discrimination complaint to the Anniston Housing Authority
   - HUD receives and investigates housing discrimination complaints
   - Would work with the city government to ask for an investigation into a fair housing complaint
   - Three interviewees are not aware of anyone providing fair housing education
   - Another four interviewees are not aware of anyone providing any fair housing services, although one person noted that there are sometimes fair housing requirements attached to grants
   - The Community Development Center and the banks have worked on a fair housing seminar together before, but did not see a big impact
   - Would be good to offer a class for renters and landlords on fair housing rights and responsibilities

- Working fair housing education into a Wednesday night Bible study at local churches would be good
- The Career Center has a resource book listing Salvation Army and the Housing Authority as potential resources for housing discrimination concerns

8) Are public resources invested in evenly throughout all neighborhoods?
- Two interviewees said the City does its best with a small budget
- Two other interviewees said there is pretty even investment in resources
- The City's transportation resources are equitable and the City has been supportive of transit
- Transportation in the McClellan area is difficult
- Facilities (aquatic center, parks, etc.) were developed at McClellan rather than in the neighborhoods, and now without transit they are difficult to access for many children and families
- Two interviewees said parks are good throughout the city and generally liked by residents
- Difficult to answer because some areas were neglected for so long and/or have substantial private disinvestment
- Police and fire department are doing a good job; police department may need more resources
- Police focus on getting a large number of drug arrests rather than on arrests involving larger quantities of drugs; Focus on poor neighborhoods where many people are not aware of their rights
- Quality of public schools are an issue citywide
- Roads in West Anniston are bad
- The library is a great resource
- The eastern part of the city is generally in better condition

9) Is there anything we haven't discussed that you feel is important to our research?
- There are no homeless shelters in Anniston and most homeless people stay in abandoned homes, are transient, or live on the streets; There were 300+ homeless people as of the last point-in-time county
- Home values in Anniston are low, and many renters could afford the cost of a mortgage but do not have credit
- Decent housing is not affordable on minimum wage if you are also paying childcare costs
- Transportation to work is the most important link to housing decisions; Access to medical facilities and pharmacies is important too
- There is racism in the Anniston housing industry, in the banking, housing, and judicial system, although it is subtle
- Many people are not truly engaged in resolving deep and systemic racism
- Public money should be put into the communities that need it the most
- There should be more accountability about how public money, including HUD funds, are spent
- Demolition and code enforcement would be a good use of CDBG funds
- City Council is sharply divided, but there is a need to come together to work on issues in the city

Community Survey

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

- When asked to identify housing needs in Anniston, more than one-third of respondents (58.89%) said that "some" or "a lot" more assistance for first time homebuyers is needed. Housing for seniors and housing for people with disabilities were also commonly-identified needs. Nearly 70% of respondents said "some" or "a lot" more housing for seniors is needed (69.40%) and 57.38% said "some" or "a lot" more housing for people with disabilities in needed.

- Thinking about the provision of public resource in Anniston, more than half of respondents indicated that garbage collection, police and fire protection, banking and lending services, and parks and trails are equally provided in all parts of Anniston. Resources that were commonly perceived as not being equally provided include roads and sidewalks (identified as unequally provided by 53.01% of respondents), property maintenance (50.28%), and grocery stores and other shopping (48.91%).

- Over half of respondents (58.15%) report understanding their fair housing rights, although considerably less (39.78%) know where to file a housing discrimination complaint. One-fifth of respondents (20.11%) say they do not know their fair housing rights, but 46.24% do not know where to file a discrimination complaint.

- Eleven respondents experienced housing discrimination since living in Anniston. Landlords or property managers were the most frequent discriminators, impacting 8 out of the 11 respondents (72.73%) who experienced discrimination, followed by real estate agents (3 out of 11 respondents or 27.27%). The most frequent bases for discrimination were familial status (5 out of 11 cases) and race (4 out of 11 cases).

  Of the 11 survey participants who experienced discrimination, only three made a report of it. Reasons for not reporting included not knowing what good it would do (5 out of 8 cases), not knowing where to file (2 out of 8 cases), and fear of retaliation (also 2 out of 8 cases).

- Survey participants were asked whether they think housing discrimination is an issue in Anniston. About 40% of respondents said no, 14% said maybe and 10% said yes. The remaining 36% did not know.

- Asked to select any factors that are barriers to fair housing in Anniston, respondents identified the following as the top five impediments to fair housing:
  o Neighborhoods that need revitalization and new investment (65.47% of respondents);
  o Limited access to good schools (51.08% of respondents);
  o Limited access to jobs (45.32% of respondents);
  o Lack of housing options for people with disabilities (27.34% of respondents); and
  o Community opposition to affordable housing (22.30%).

IV. Assessment of Past Goals, Actions & Strategies

1. **Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:**

   a. **Discuss what progress has been made toward their achievement;**

   The City of Anniston completed an Analysis of Impediments to Fair Housing Choice in 2009. The AI concluded that there were potential impediments that can directly or indirectly impact fair housing choice by protected classes. Direct impacts to fair housing identified in the report include:

   - Potential discrimination in rental and for-sale markets;
   - Lack of information and of confidence in the City to improve the local housing climate and address identified impediments;
   - Lack of a dedicated housing counseling agency with information about resources to address housing needs;
   - Ongoing need for public transportation to services and employment opportunities;
   - Ongoing need for job training and educational opportunities outside of secondary education; and
   - Need for more programs related to financial education.

   The study also identified several conditions with the potential to indirectly limit fair housing choice, although recognized that these are systemic and difficult to change:

   - Income disparities among protected classes;
   - Geographic concentration of non-white racial minorities;
   - Geographic concentration of low- and very-low income housing and public housing in the west and south areas of the city;
   - Drug activity and related crime in low-income areas;
   - Limited numbers of affordable, accessible units in the existing housing stock;
   - Perception of a troubled public education system in Anniston; and
   - Perception of remaining environmental hazards in western parts of the city.

   To address these potential impediments to fair housing choice, the Analysis of Impediments outlined recommended actions for an 18-month period. These recommendations are listed below, with the progress made to date since 2009.

   <u>Within Six Months</u>

   1. Continue to partner through the Anniston/Calhoun County HOME Consortium to gain designation as a Participating Jurisdiction, in order to pursue new housing and neighborhood models.

- The Anniston/Calhoun County HOME Consortium has been a HOME program participant since 2009.

2. Begin a year-round, active, and vigorous public education campaign about fair housing choice, which includes information on fair housing rights and responsibilities, as well as housing programs and units available.

   - The City of Anniston hosted educational presentations and training sessions related to fair housing for professionals, citizens, and public officials as part of National Fair Housing Month.
   - The City has also promoted speaking engagements in Anniston about fair housing by the Alabama Board of Realtors.

Within Twelve Months

3. Incorporate a neighborhood analysis and expanded housing and community development plan into the city's comprehensive planning process and annual consolidated plan.

   - The City considers housing needs at the neighborhood level in developing its annual action plans and five-year Consolidated Plan, and West Anniston has been a recent focus of its housing efforts and public infrastructure improvements.
   - The City of Anniston developed a Strategic Plan in 2014 that outlines goals for the city over the next ten years. Goals relevant to housing and community development include:
     o Creating a coordinated program to reduce vacant and dilapidated buildings;
     o Enhancing the physical appearance of the community;
     o Establishing a task force on homelessness; developing a Neighborhood Leadership Development Program to promote neighborhood enhancements;
     o Updating zoning regulation;
     o Creating a conceptual plan for West Anniston;
     o Developing mixed income housing; and
     o Expanding transit into surrounding areas for jobs

4. More actively promote new development and redevelopment of affordable housing, including additional units for persons with disabilities.

5. Update the City's comprehensive master plan, with long-term vision and goals as well as strategic actions for implementation, including land use recommendations that provide innovative mixed use and income housing opportunities in more diverse neighborhoods, where possible.

   - The City has not updated its comprehensive plan, but developed a 10-year Strategic Plan for the city in 2014. Please see item 3 above for a list of relevant goals from the Strategic Plan.

6. Continue to update the City's zoning ordinance and subdivision regulation to include mixed-use and mixed-income housing opportunities as well neighborhoods that provide convenient access to services, shopping, and job opportunities.

- The City updated its zoning ordinance in July 2016. The Urban Center 1 and Urban Center 2 districts offer opportunities for mixed-use development. The Urban Neighborhood 1 District focuses on a mix of residential uses (small-lot single-family and multifamily), along with retail, office, and civic uses.

7. Adopt a rental permitting ordinance and expand it over time to meet community needs by working with landlords, tenants, and other stakeholders.
   - The City of Anniston began a rental inspection program to address complaints by tenants about living conditions in rental units. Following inspection, the City issues a Certificate of Occupancy valid for twelve months or until the dwelling becomes vacant following the expiration date.

8. Promote the concept of visitability in all new construction projects. Develop a written policy which increases the use of visitability in City-funded projects.

<u>Within Eighteen Months</u>

9. Using the public education campaign as a base, develop a citizen-based Housing Plan that promotes fair housing choice.

10. Facilitate the creation of a housing counseling agency, which specifically focuses on serving people of low-incomes as a one-stop-shop for housing-related questions.

11. Consider a more specific urban redevelopment plan and program for the most blighted parts of the city and include regulatory and financial incentives for affordable housing.

   - The City of Anniston completed the West Anniston Master Plan in 2014 which outlines redevelopment goals and activities for the neighborhood. The City is working with Anniston City Schools and the Anniston Housing Authority to implement the plan, and the housing authority has recently applied for a HUD Choice Neighborhood Planning Grant to assist in revitalization efforts for blighted areas in West Anniston.

Work with EARPC, MPO, and the local workforce development program to create or leverage innovative job-to-home transportation initiatives.

b. **Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences);**

Of the twelve recommendations stemming from the 2009 AI, the City of Anniston has made progress on several. Not all recommendations have been implemented, however the City has been able to expand its resources for affordable housing through the HOME program and has recently developed several planning approaches to further community development initiatives and expand housing choice. In 2014, the City prepared the West Anniston Master Plan and citywide Strategic Plan; in 2016, Anniston adopted a new zoning ordinance.

c. **Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced; and**

The City's primary constraints on the achievement of past fair housing goals have been staff capacity and financial resources. The AFH will focus on a smaller number of strategic goals upon which the city anticipates making continued progress over the next five years.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The current goals will focus more on making measurable progress towards addressing fair housing choice in Anniston. Whereas several of the goals identified in the 2009 report called for development of new plans, current goals will be more focused on activities to expand access to opportunity or address housing needs, such as implementation of the West Anniston Master Plan as a place-based investment in the neighborhood.

Current AFH goals are also more focused on addressing potential cases of direct housing discrimination through expanded fair housing education and enforcement activities.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

The city of Anniston has a population of about 23,000 residents, of which the largest share are non-Latino African Americans (48.15%), closely followed by non-Latino whites (45.95%) (Table 1). Just over 3% of the population is Latino, while Native Americans, Asians/Pacific Islanders, people of two or more races, and people of other races each make up less than 2% of the population.

Current estimates show that only 1.62% of Anniston's population is foreign-born, and 1.38% of residents have limited English proficiency (LEP) (Table 2). For the foreign-born population, the top three countries of origin are Mexico, Thailand, and Haiti. Mexico accounts for one-fifth of Anniston's immigrant population. Spanish is the language spoken by the majority of the city's LEP population (56.11%). Other common birth countries among the foreign-born population include China, Germany, Canada, Korea, East Africa, and Venezuela.

Tables 1 and 2 present data for two additional geographies – the Anniston/Calhoun County HOME Consortium, and the Anniston-Oxford-Jacksonville, Alabama region. The HOME Consortium includes six local government jurisdictions: Anniston, Calhoun County (excluding Oxford and Ohatchee), Hobson City, Jacksonville, Weaver, and Piedmont. The Anniston-Oxford-Jacksonville region is defined as Calhoun County (inclusive of all incorporated and unincorporated areas).

Looking at racial and ethnic composition data for the Consortium and region shows that both are less diverse than the city. Of the HOME Consortium's nearly 123,000 residents, 74.16% are non-Latino whites. Non-Latino Black residents make up one-fifth of the population (19.94%), and Latinos comprise 3.21%. As in the city, other races have small population shares, with Asians, Pacific Islanders, Native Americans, and persons of other or multiple races collectively making up less than 3% of population in the HOME Consortium. Population shares by race and ethnicity are nearly identical within the region.

Foreign-born residents and persons with limited English proficiency make up slightly larger shares of the population in the HOME Consortium than they do in the city: 2.32% of people were born outside of the U.S. and 1.44% speak limited English. Common countries of birth for foreign-born persons include Mexico, Germany, Korea, England, Thailand, and the Philippines. Like in the city, Spanish is the most common language for the LEP population (48.00%). Regionally, foreign-born and LEP residents make up similar population shares as they do in the HOME Consortium. Mexico, Germany, Korea, the Philippines, Guatemala, and Canada are the most common native countries for foreign-born residents in the region.

Table 2 provides demographic trends since 1990 using the decennial Census and American Community Survey. Since 1990, the city of Anniston's population contracted from about 30,500 people to about 23,000. Population losses were recorded for reach racial and ethnic group except for Latinos, whose population grew by about 43% (or 226 people) during that timeframe.

While population fell, the city also became more diverse. The African American share of the population grew by 8.3 percentage points between 1990 and 2010 and the Latino population grew by 1.5 percentage points. In contrast, white population shares decreased each decade. In 1990, white people comprised 57.29% of the Anniston population; that number fell to 50.83% in 2000 and 45.95% in 2010.

In the HOME Consortium and the Anniston-Oxford-Jacksonville region, total population fell from 1990 to 2000 but then grew through 2010. Over the 20-year period, the white population declined slightly (by 4-5% or about 4,500 people) in each geography. Each of the remaining groups (Blacks, Latinos, Asians/Pacific Islanders, and Native Americans) grew in population and population share. Most notably, the Latino population more than tripled in both the Consortium and region, adding about 2,600 residents.

In Anniston, the share of foreign-born residents grew from 1990 to 2000 and 2010, but is currently at a similar rate to 1990. The share of people with limited English proficiency declined from about 1.82% to 1.38%. In contrast, the HOME Consortium and region saw an increase in foreign-born residents as a share of total population, from 1.2% in 1990 to 2.3% as of the 2009-2013 American Community Survey. The LEP population also grew slightly, from 1.2% to 1.4% since 1990.

Turning to other characteristics of the population, nearly one-quarter of city of Anniston residents have a disability (24.55%), as does one-fifth (20.00%) of the regional population. In all three geographies (city, HOME Consortium, and region), ambulatory difficulties (i.e., serious difficulty walking or climbing stairs) were most common. Over 15% of city residents have ambulatory difficulties, as do 12% of HOME Consortium and regional residents. Cognitive difficulties (i.e., difficulty remembering, concentrating, or making decisions) and independent living difficulties (i.e., difficulties doing errands alone such as visiting a doctor's office or shopping) were the second and third most common disabilities.

About 53% of the population in the city of Anniston are women and 47% are men, which is similar to the breakdown in the Consortium and region, with little variation since 1990.

Looking now at age of the population, residents under the age of 18 make up just over one-fifth of the population in the city of Anniston, the HOME Consortium, and the region (21.94%-22.89%). Seniors age 65 and over comprise nearly 17% of the city's population and just over 14% of the HOME Consortium's and region's population.

The share of families with children (defined as households with two or more people related by birth, marriage, or adoption) fell steadily in the city since 1990, from 3,622 families with children to 2,167. Regionally and in the HOME Consortium, the number of families with children decreased from 1990 to 2000 but grew through 2010. These trends may reflect school preferences, as several stakeholders note that families with school-aged children often opt to locate in outside of Anniston city limits to attend Calhoun County schools.

Table 1. Demographics								
Race/Ethnicity	**City of Anniston**			**Anniston HOME Consortium**			**Anniston-Oxford-Jacksonville Region**	
		#	**%**		**#**	**%**		**#**	**%**
Non-Hispanic									
White		10,629	45.95%		91,071	74.16%		87,285	73.61%
Black		11,138	48.15%		24,484	19.94%		24,177	20.39%
Asian or Pacific Islander		209	0.90%		931	0.76%		924	0.78%
Native American		71	0.31%		497	0.40%		480	0.40%
Two or More Races		319	1.38%		1,770	1.44%		1,704	1.44%
Other		23	0.10%		111	0.09%		109	0.09%
Hispanic		742	3.21%		3,943	3.21%		3,893	3.28%
National Origin									
#1 country of origin	Mexico	77	0.36%	Mexico	653	0.70%	Mexico	1,203	1.09%
#2 country of origin	Thailand	51	0.24%	Germany	260	0.28%	Germany	334	0.30%
#3 country of origin	Haiti	46	0.21%	Korea	190	0.20%	Korea	205	0.19%
#4 country of origin	China	38	0.18%	England	66	0.07%	Philippines	133	0.12%
#5 country of origin	Germany	37	0.17%	Thailand	62	0.07%	Guatemala	93	0.08%
#6 country of origin	Canada	22	0.10%	Philippines	56	0.06%	Canada	87	0.08%
#7 country of origin	Korea	22	0.10%	Iraq	50	0.05%	England	66	0.06%
#8 country of origin	Other East Africa	15	0.07%	Canada	46	0.05%	Thailand	62	0.06%
#9 country of origin	Venezuela	8	0.04%	Haiti	46	0.05%	India	55	0.05%
#10 country of origin				Japan	46	0.05%	Iraq	50	0.05%
Limited English Proficiency (LEP) Language									
#1 LEP Language	Spanish	179	0.83%	Spanish	850	0.91%	Spanish	1,430	1.29%
#2 LEP Language	Chinese	38	0.18%	Korean	83	0.09%	Korean	98	0.09%
#3 LEP Language	German	35	0.16%	German	75	0.08%	German	94	0.08%
#4 LEP Language	Korean	22	0.10%	Chinese	59	0.06%	Chinese	59	0.05%

Limited English Proficiency (LEP)	City of Anniston			Anniston HOME Consortium			Anniston-Oxford-Jacksonville Region		
	Language	**#**	**%**				**Language**	**#**	**%**
#5 LEP Language				French	32	0.03%	French	32	0.03%
#6 LEP Language				Arabic	26	0.03%	Arabic	26	0.02%
#7 LEP Language				Japanese	9	0.01%	Japanese	9	0.01%
#8 LEP Language				Tagalog	9	0.01%	Tagalog	9	0.01%
Disability Type									
Hearing difficulty	1,139	5.49%		4,581	4.97%		5,379	4.92%	
Vision difficulty	1,102	5.31%		3,788	4.11%		4,379	4.01%	
Cognitive difficulty	2,167	10.45%		7,778	8.43%		9,053	8.29%	
Ambulatory difficulty	3,231	15.58%		11,463	12.42%		13,322	12.19%	
Self-care difficulty	1,332	6.42%		4,276	4.63%		4,873	4.46%	
Independent living difficulty	2,031	9.79%		7,375	7.99%		8,786	8.04%	
Sex									
Male	10,782	46.61%		59,268	48.26%		57,176	48.22%	
Female	12,349	53.39%		63,539	51.74%		61,396	51.78%	
Age									
Under 18	5,075	21.94%		28,108	22.89%		27,126	22.88%	
18-64	14,144	61.15%		77,057	62.75%		74,456	62.79%	
65+	3,912	16.91%		17,642	14.37%		16,990	14.33%	
Family Type									
Families with children	2,167	37.34%		13,126	39.97%		12,646	40.01%	

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city, HOME Consortium, and region levels may not be the same, and are thus labeled separately.

Data Sources: Decennial Census; ACS

Table 3. Demographic Trends								
City of Anniston								
Race/Ethnicity	**1990**		**2000**		**2010**		**Current**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	17,537	57.29%	12,357	50.83%	10,629	45.95%	10,629	45.95%
Black, Non-Hispanic	12,171	39.76%	11,160	45.91%	11,351	49.07%	11,138	48.15%
Hispanic	516	1.69%	420	1.73%	742	3.21%	742	3.21%
Asian or Pacific Islander, Non-Hispanic	277	0.90%	212	0.87%	243	1.05%	209	0.90%
Native American, Non-Hispanic	80	0.26%	115	0.47%	140	0.61%	71	0.31%
National Origin								
Foreign-born	503	1.63%	587	2.42%	535	2.31%	375	1.62%
LEP								
Limited English proficiency	559	1.82%	416	1.72%	395	1.71%	319	1.38%
Sex								
Male	14,726	47.87%	11,150	45.99%	10,782	46.61%	10,782	46.61%
Female	16,036	52.13%	13,096	54.01%	12,349	53.39%	12,349	53.39%
Age								
Under 18	7,911	25.72%	5,874	24.23%	5,075	21.94%	5,075	21.94%
18-64	18,199	59.16%	13,903	57.34%	14,144	61.15%	14,144	61.15%
65+	4,652	15.12%	4,469	18.43%	3,912	16.91%	3,912	16.91%
Family Type								
Families with children	3,622	46.25%	2,359	40.69%	2,167	37.34%	2,167	37.34%
Anniston HOME Consortium								
Race/Ethnicity	**1990**		**2000**		**2010**		**Current**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	95,506	79.76%	91,232	78.44%	91,071	74.16%	91,071	74.16%
Black, Non-Hispanic	21,745	18.16%	21,403	18.40%	25,366	20.66%	24,484	19.94%
Hispanic	1,287	1.07%	1,765	1.52%	3,943	3.21%	3,943	3.21%
Asian or Pacific Islander, Non-Hispanic	802	0.67%	874	0.75%	1,234	1.00%	931	0.76%
Native American, Non-Hispanic	294	0.25%	844	0.73%	1,058	0.86%	497	0.40%
National Origin								
Foreign-born	1,478	1.23%	1,931	1.66%	2,992	2.44%	2,847	2.32%
LEP								
Limited English proficiency	1,419	1.18%	1,258	1.08%	2,001	1.63%	1,771	1.44%
Sex								
Male	58,018	48.45%	55,446	47.67%	59,268	48.26%	59,268	48.26%
Female	61,739	51.55%	60,858	52.33%	63,539	51.74%	63,539	51.74%

Table 2. Demographic Trends (continued)								
Age								
Under 18	29,909	24.97%	28,326	24.36%	28,108	22.89%	28,108	22.89%
18-64	74,960	62.59%	71,593	61.56%	77,057	62.75%	77,057	62.75%
65+	14,888	12.43%	16,385	14.09%	17,642	14.37%	17,642	14.37%
Family Type								
Families with children	15,523	47.21%	10,742	42.84%	13,126	39.97%	13,126	39.97%
	Anniston-Oxford-Jacksonville Region							
Race/Ethnicity	**1990**		**2000**		**2010**		**Current**	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	92,137	79.39%	87,590	78.03%	87,285	73.61%	87,285	73.61%
Black, Non-Hispanic	21,459	18.49%	21,034	18.74%	25,036	21.11%	24,177	20.39%
Hispanic	1,267	1.09%	1,744	1.55%	3,893	3.28%	3,893	3.28%
Asian or Pacific Islander, Non-Hispanic	800	0.69%	869	0.77%	1,222	1.03%	924	0.78%
Native American, Non-Hispanic	277	0.24%	832	0.74%	1,005	0.85%	480	0.40%
National Origin								
Foreign-born	1,462	1.26%	1,907	1.70%	2,968	2.50%	2,822	2.38%
LEP								
Limited English proficiency	1,403	1.21%	1,242	1.11%	1,993	1.68%	1,757	1.48%
Sex								
Male	56,189	48.42%	53,485	47.65%	57,176	48.22%	57,176	48.22%
Female	59,845	51.58%	58,764	52.35%	61,396	51.78%	61,396	51.78%
Age								
Under 18	29,046	25.03%	27,332	24.35%	27,126	22.88%	27,126	22.88%
18-64	72,602	62.57%	69,092	61.55%	74,456	62.79%	74,456	62.79%
65+	14,386	12.40%	15,825	14.10%	16,990	14.33%	16,990	14.33%
Family Type								
Families with children	15,037	47.35%	10,232	42.88%	12,646	40.01%	12,646	40.01%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: Decennial Census; ACS

2. **Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.**

According to 2011-2015 American Community Survey data, most households in Anniston, the HOME Consortium, and the region are homeowners. In the city, 55.45% of households own their homes and 44.55% rent. Ownership rates are higher in the region, where over two-thirds of households own their homes (69.05%) and 30.95% rent.

The homeownership rate in the city declined by 4.04 percentage points since 2000, when it was 59.49%. The region saw a similar decline – it's homeownership rate fell by 3.47 percentage points, from 72.52% in 2000.

The maps that follow show the share of owners and renters by census tract in the city of Anniston and HOME Consortium. Within the city, homeownership is most prevalent in southeast Anniston, to the south and east of the Anniston Country Club and in the Edgefield and Golden Springs neighborhoods (Figure 1). These areas cover two census tracts - tract 9 and 10 – with homeownership rates of 71% and 69%, respectively. While the map shading indicates a tract with a high homeownership rates in the southwestern portion of the city, all the homes within that tract lie outside the city limits; the portions of the tract within the city are undeveloped.

Within Anniston, rental households are most common in three census tracts – tracts 3, 6, and 7 – where between 62% and 69% of households rent (Figure 2). Tract 3 covers parts of West Anniston, while tract 6 lies east of the railroad tracks and west of Quintard Avenue, bounded by 15th Street to the south and Blue Mountain Road to the north. Tract 7 covers the majority of the northern part of Anniston, including Fort McClellan, neighborhoods around Jacksonville State University's McClellan Center, and neighborhoods to the north of Edgemont Cemetery.

Looking at the HOME Consortium and region, one census tract outside of Anniston is more than 50% renters. Eighty-seven percent (87%) of households in tract 21.01 in northwest Jacksonville are renters; this tract extends outside of the city to include areas to the north and west of Jacksonville State University. Regionally, the tracts with the highest homeownership rates include two in western Calhoun County, along its border with Etowah and Saint Clair Counties. These tracts, which include Wellington and Ohatchee, are both 87% homeowners.

Figure 1. Share of Households that are Owners in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool
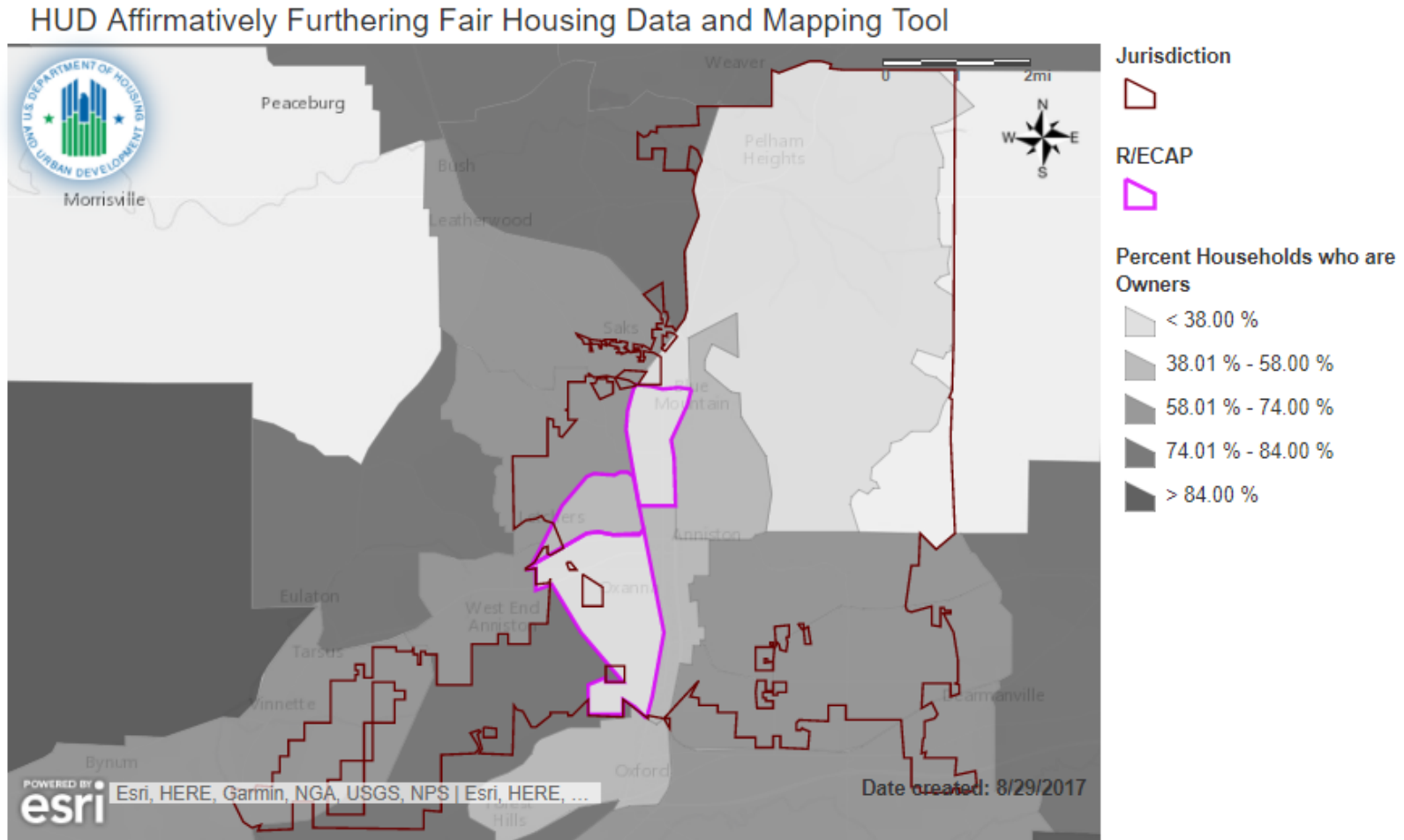
Name: Map 16 - Housing Tenure
Description: Housing Tenure by Owners with R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 2. Share of Households that are Renters in the Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Jurisdiction

R/ECAP

Percent Households who are Renters

< 15.00 %

15.01 % - 23.00 %

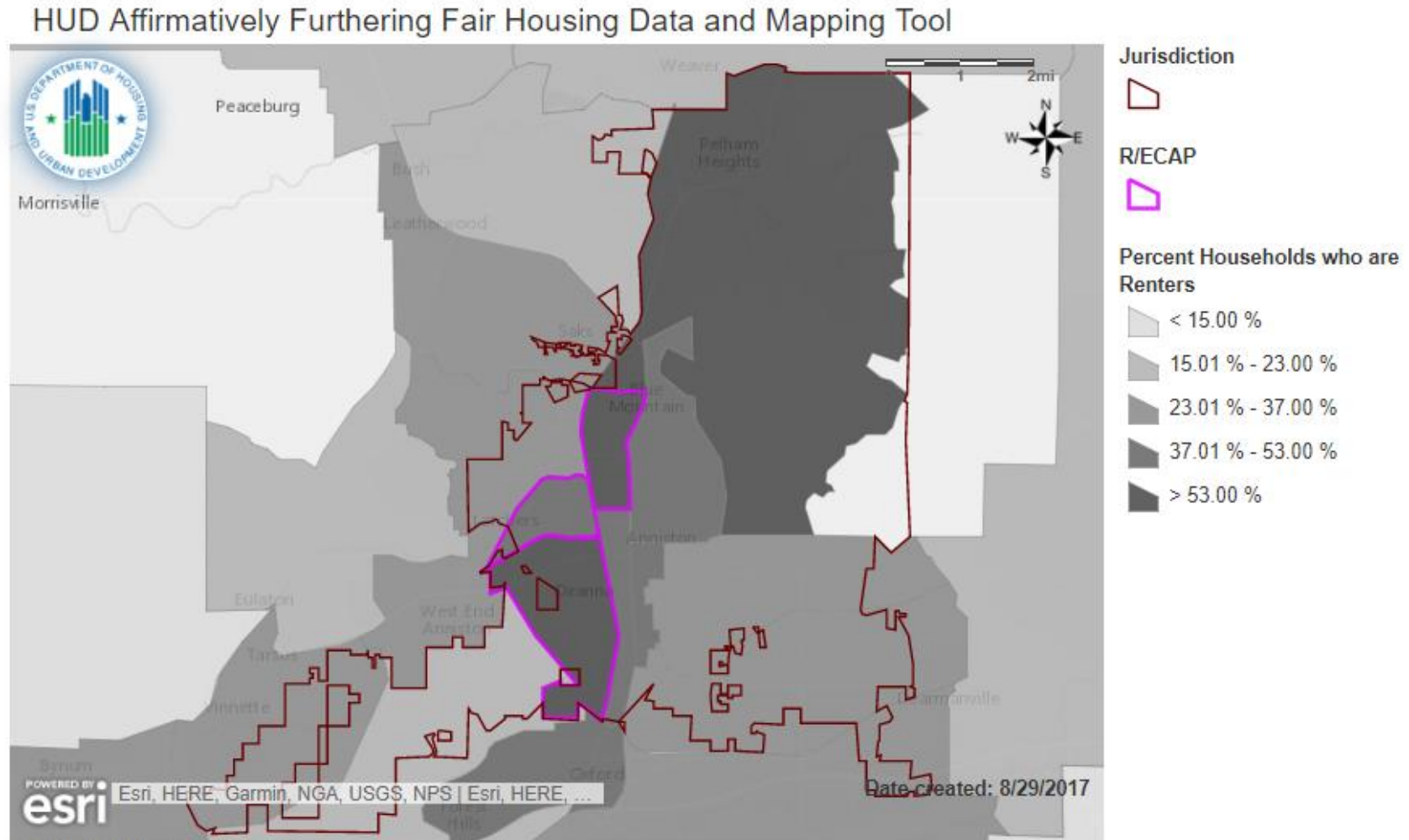23.01 % - 37.00 %

37.01 % - 53.00 %

> 53.00 %

Name: Map 16 - Housing Tenure
Description: Housing Tenure by Renters with R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority, or vice versa.

The table below shares the dissimilarity indices for four pairing in the city of Anniston, the Anniston HOME Consortium, and the Anniston-Oxford-Jacksonville region. The table presents values for 1990, 2000, and 2010 all calculated using census tracts as the area of measurement; the "current" figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that rely on census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations. A study of the effect of using census block groups instead of tracts to examine housing patterns in 331 metropolitan areas throughout the U.S. indicated that index scores were modestly higher when using block groups, by an average of 3.3 for all metro area dissimilarity scores.[1] The assessment below relies on the "current" 2010 figure (calculated using block groups), while the trend analysis in part (b) will use the indices developed at the census tract level.

---

[1] Iceland, John, and Erika Steinmetz. 2003. *The Effects of Using Block Groups Instead of Census Tracts When Examining Residential Housing Patterns*. U.S. Census Bureau, Washington DC: US. Accessed via https://www.census.gov/hhes/www/housing/resseg/pdf/unit_of_analysis.pdf.

As of 2010, segregation levels within the city were moderate among white and non-white residents (DI = 44.11) and white and Black residents (DI = 49.05). Anniston segregation levels were considerably lower, and in HUD's "low" range, between white and Latino residents (DI = 34.73) and white and Asian/Pacific Islander residents (DI = 33.99).

In the HOME Consortium and region, segregation levels were similar to those of the city for most pairings. In both geographies, two pairings showed moderate segregation: white and non-white residents (with a DI of 46.52 in the Consortium and 44.52 in the region) and white and African American residents (with a DI of 51.50 in the Consortium and 50.13 in the region). As in Anniston, segregation amongst white and Latino residents and white and Asian/Pacific Islander residents was low in the HOME Consortium and the region, with DIs ranging from 35.84 to 37.44.

Race/Ethnicity Dissimilarity Index	City of Anniston				Anniston HOME Consortium				Anniston-Oxford-Jacksonville Region			
Table 4. Racial/Ethnic Dissimilarity Trends	Trends			Current (2010)	Trends			Current (2010)	Trends			Current (2010)
	1990	2000	2010		1990	2000	2010		1990	2000	2010	
Non-White/White	52.93	48.70	38.08	44.11	46.32	42.82	38.15	46.52	46.67	42.99	37.96	44.52
Black/White	55.01	53.62	45.84	49.05	49.29	48.33	44.42	51.50	49.66	48.65	44.24	50.13
Hispanic/White	43.19	25.40	21.80	34.73	40.85	31.29	32.75	35.84	40.79	30.62	32.40	37.40
Asian or Pacific Islander/White	45.99	24.83	25.08	33.99	45.08	35.93	28.77	37.44	44.25	34.72	27.91	36.83

Data Sources: Decennial Census

b. Explain how these segregation levels have changed over time (since 1990).

This examination of segregation levels over time relies on dissimilarity indices calculated from tract level data from the 1990, 2000, and 2010 census, as provided in the previous table. In Anniston, segregation levels fell for all pairings from 1990 to 2000, and for three of the four pairings from 2000 to 2010.

White/non-white segregation dropped by 14.85 points during the 20-year period, from a moderate level of 52.93 to a low level of 38.08. White/Hispanic segregation also declined from a moderate level in 1990 (43.19) to a low level in 2010 (21.80). Segregation between white and Asian/Pacific Islander residents recorded the largest drop of 20.91 points, from a moderate level of 45.99 in 1990 to a low level of 25.08 in 2010.

Only one pairing – white and African American residents – had a high level of segregation in 1990 (55.01); by 2000 this figure dropped to a moderate level (53.62) and continued to decline through 2010 to reach 45.84.

Historical segregation figures for the HOME Consortium and the region are quite similar. In 1990, segregation was moderate at the Consortium and regional levels for all pairings, with DI values ranging from 40 for whites and Latinos to 49 for whites and African Americans. Each pairing showed lower levels of segregation in the Consortium and region than in the city of Anniston.

Between 1990 and 2000, segregation fell for all four pairings, with two (Latinos and whites and Asians/Pacific Islanders and whites) moving into HUD's "low" DI range. Between 2000 and 2010, the white/non-white pairing also moved from a moderate to low level of segregation in both the Consortium and region.

By 2010, segregation levels in the city were roughly equivalent with those of the Consortium and region for non-white/white and African American/white pairings. For segregation between Latinos and whites and Asians/Pacific Islanders and whites, levels were lower in the city than in the Consortium and region by 2010. While segregation among these pairings fell in the Consortium and region since 1990, they did not decline as in the city.

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

The maps that follow identify population by race and ethnicity by block group in Anniston and the region. They also include maps that identify foreign-born population and people with limited English proficiency by block group.

Looking first at segregation and integration by race and ethnicity, the maps reveal that the majority of Anniston's white population lives in Golden Springs, East Anniston and other neighborhoods around the Anniston Country Club, and in neighborhoods east of downtown across Quintard Avenue, around the Regional Medical Center and Stringfellow Memorial Hospital. The majority of Anniston's African American residents live in West Anniston, Joyview Heights, the Quarters, Randolph Park, neighborhoods along Noble Street and Quintard Avenue near Edgemont Cemetery, and in the neighborhoods east of downtown across Quintard Avenue. The City's Latino population is concentrated in Golden Springs, East Anniston, neighborhoods around Edgemont Cemetery, and the neighborhoods east of downtown across Quintard Avenue.

Regionally, most parts of unincorporated Calhoun County are majority white. White residents also make up large shares of the population in Ohatchee and Piedmont, while Jacksonville, Oxford, Hobson City, and Saks are more diverse. The county's African American population lives predominately in Anniston or Jacksonville, while Latinos reside primarily in Anniston, Oxford, Jacksonville, and Saks.

Visually, it can be seen that the city's areas of greatest integration include parts of the Golden Springs area in southeastern Anniston, and the neighborhoods that lie east of downtown and surround the Regional Medical Center and Stringfellow Memorial Hospital. The latter area is roughly bounded by Quintard Avenue on the west, East 23rd Street on the north, Elizabeth Street and the Municipal Golf Course on the east, and East 10th Street on the south.

Segregated areas include West Anniston, Randolph Park, neighborhoods south of Blue Mountain Road including the Norwood Park area, and Glendale, where more than 80% of residents are African American. White residents make up more than 80% of the population in the areas to the southeast of the Anniston Country Club, including neighborhoods along Hathaway Heights Road, Henry Road, and Choccolocco Road.

Regionally, Anniston, Jacksonville, Saks, Hobson City, and parts of Oxford are the most racially and ethnically diverse. Unincorporated Calhoun County and Ohatchee are more segregated, with the large majority of their population (more than 90%) being white.

Turning to national origin, Figure 6 identifies residential patterns for foreign-born populations in Anniston and the region for the five most common countries of origin. By far, most of the region's foreign-born residents reside in the Anniston, Oxford, and Saks areas. Within Anniston, most Mexican immigrants live in the Golden Springs area, south of Choccolocco Road. Chinese immigrants live in around the Anniston Country Club and the areas to the east of it, while Haitian immigrants reside primarily in the tract north of downtown and south of Edgemont Cemetery. While Golden Springs is a relatively diverse area, the areas to the east of the Anniston Country Club are more segregated (with majority white residents), as is the tract north of downtown (with majority African American residents).

As the last map shows, residency patterns for people with limited English proficiency closely follow those of foreign-born groups. Spanish speakers – the language spoken by most LEP groups in the city and region – reside primarily in Golden Springs, Oxford, Hobson City, and Saks. Chinese and Korean speakers live predominately in the area to the east of the Anniston Country Club and north of Golden Springs.

Figure 3. Population by Race and Ethnicity in the City of Anniston, 2010

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool
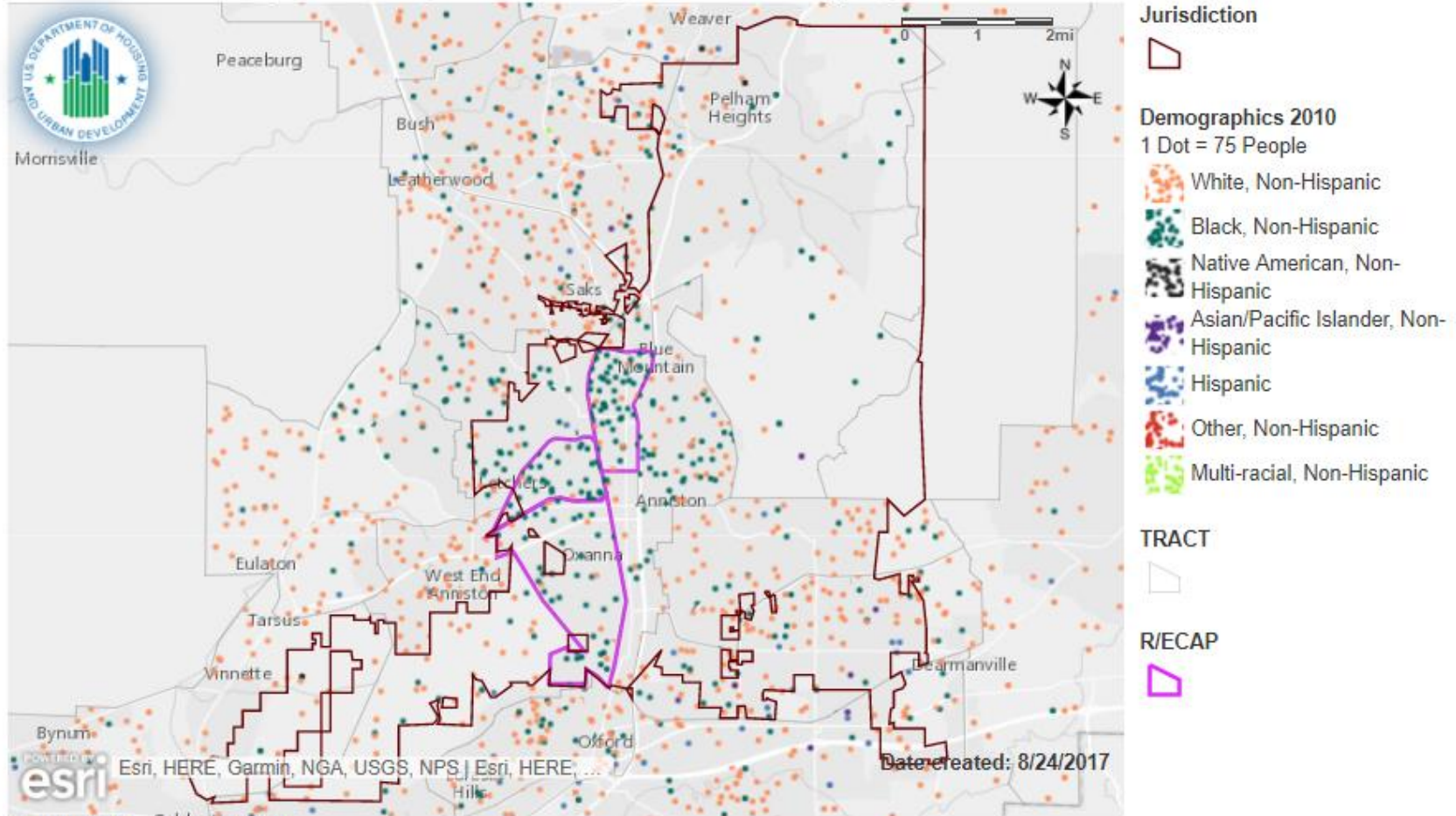
Name: Map 1 - Race/Ethnicity
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 4. Population by Race and Ethnicity in the City of Anniston, 2000

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Jurisdiction

Demographics 2000
1 Dot = 75 People
- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic

TRACT

R/ECAP

Date created: 8/24/2017

Esri, HERE, Garmin, NGA, USGS, NPS | Esri, HERE, ...
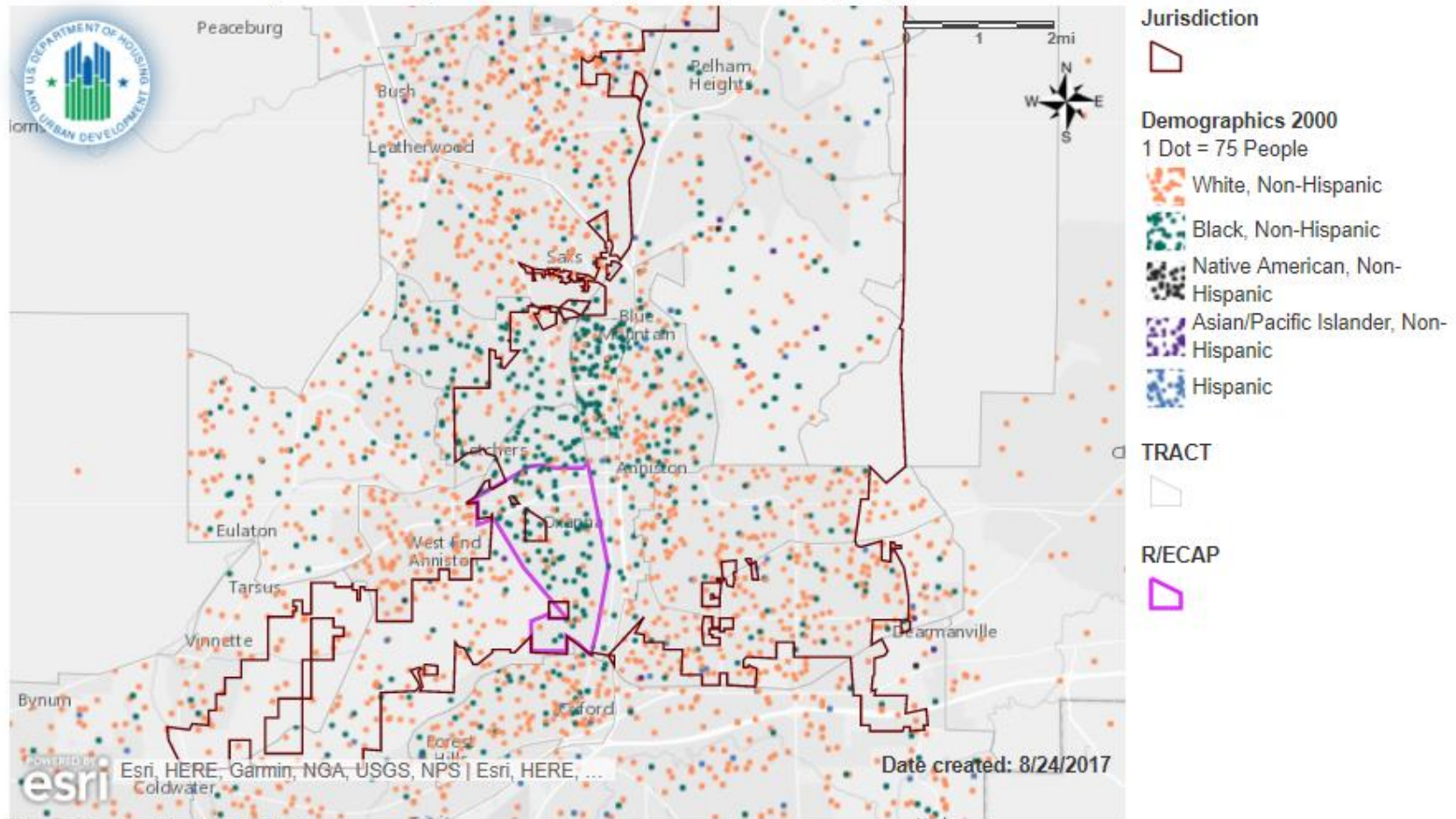
Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 5. Population by Race and Ethnicity in the City of Anniston, 1990

Figure 6. Foreign-Born Population by Nationality in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
- Mexico
- Thailand
- Haiti
- China excl. Hong Kong & Taiwan
- Germany

TRACT

R/ECAP

Date created: 8/24/2017

Esri, HERE, Garmin, NGA, USGS, NPS | Esri, HERE, ...

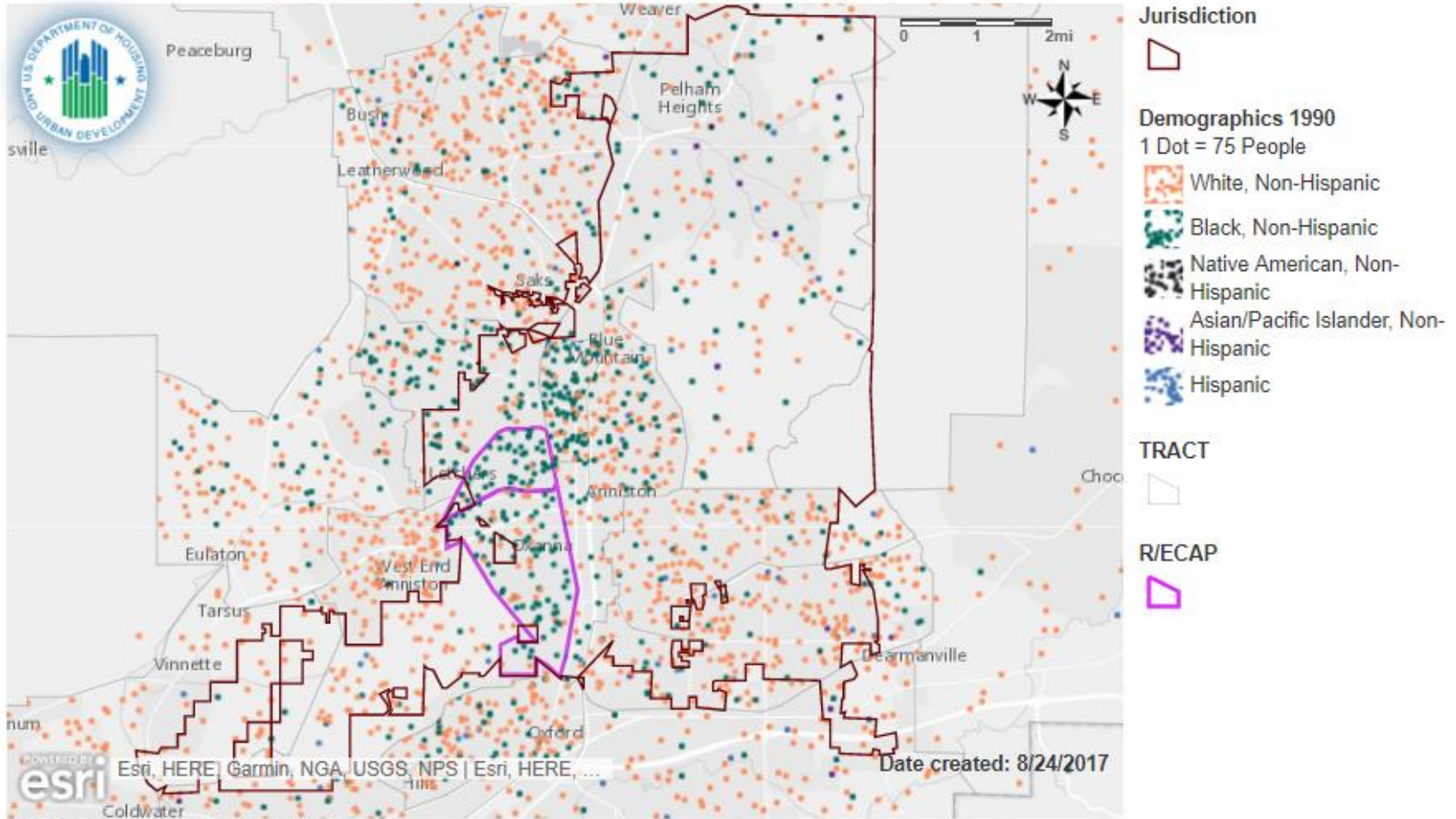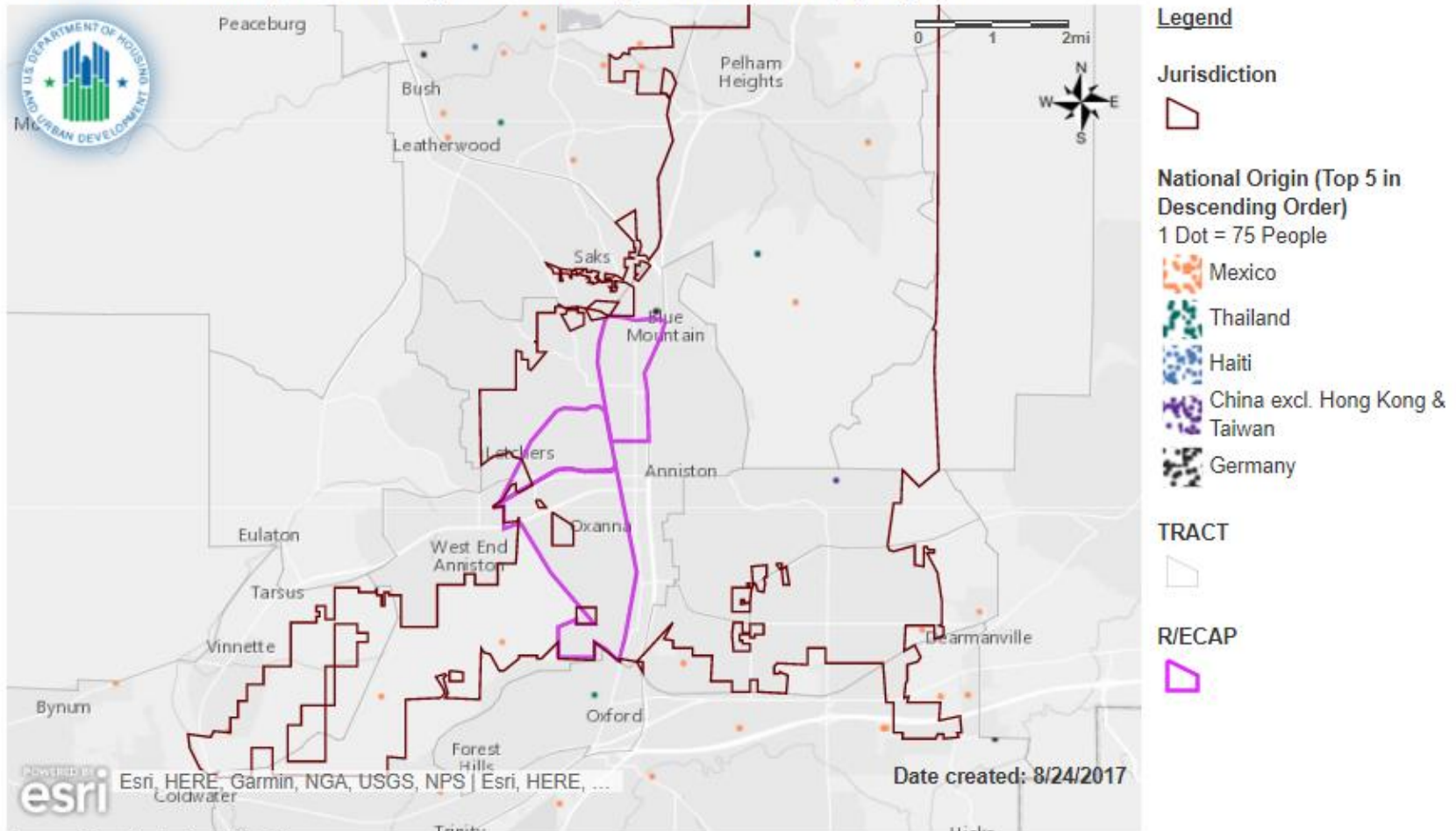**Name:** Map 3 - National Origin
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 7. Persons with Limited English Proficiency in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool
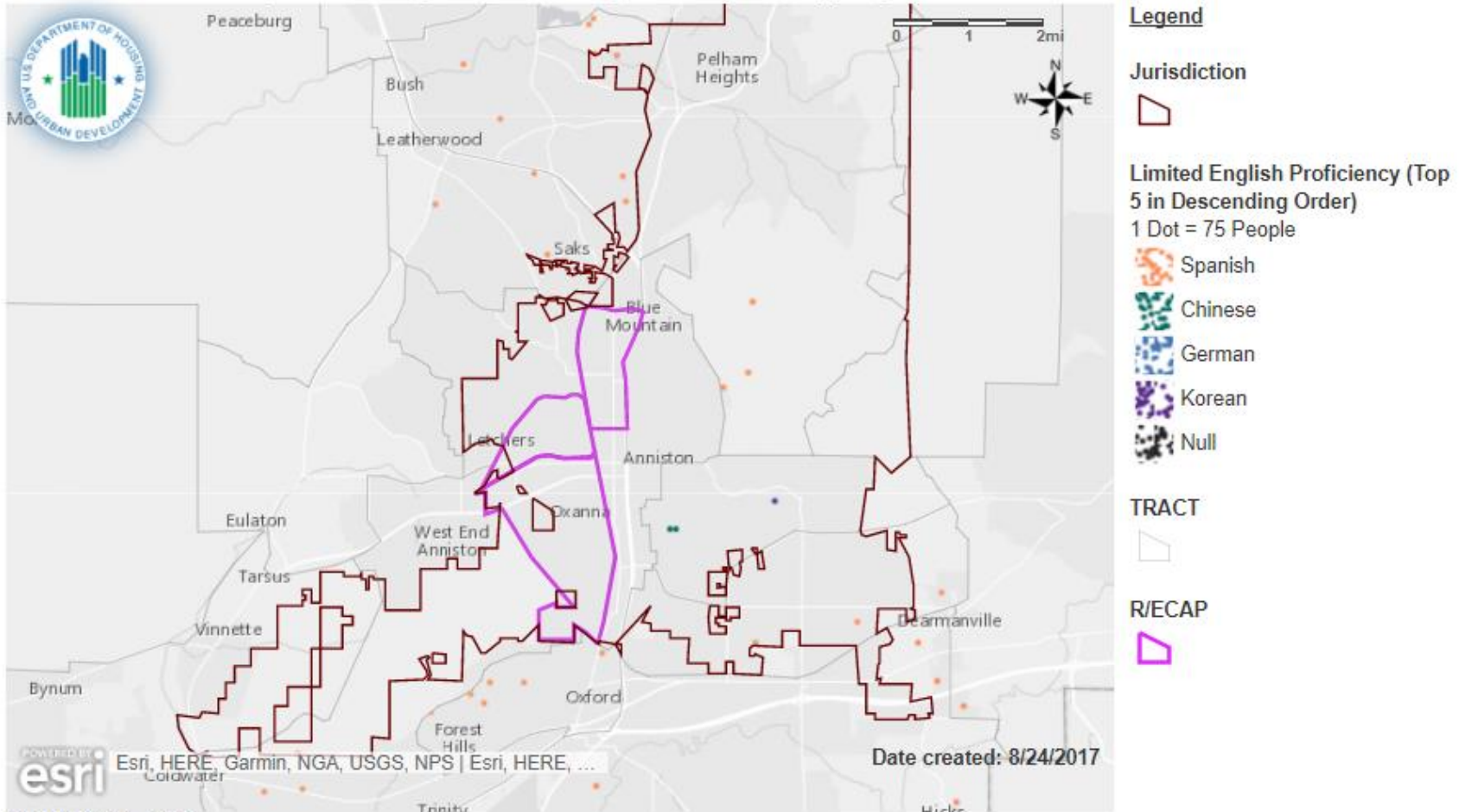
Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Anniston (CDBG)

Region: Anniston-Oxford-Jacksonville, AL

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

As discussed in the Demographic Summary, owner-occupied housing is most prevalent in southeast Anniston, to the south and east of the Anniston Country Club and in the Edgefield and Golden Springs neighborhoods. The Edgefield and Golden Springs neighborhoods are relatively integrated areas. The areas to the south and east of the Anniston Country Club, including neighborhoods along Hathaway Heights Road, Henry Road, and Choccolocco Road, are segregated and more than 80% of the population there is white.

In the region, tracts with the highest homeownership rates are located along Calhoun County's western border and include Ohatchee and Wellington, where the large majority of the population (over 90%) is white.

In Anniston, rental households are most common in West Anniston, the area west of Quintard Avenue bounded by 15th Street to the south and Blue Mountain Road to the north, neighborhoods north of Edgemont Cemetery, and the northeastern part of the city, including Fort McClellan. West Anniston and the tract south of Blue Mountain Road are segregated areas, with Black populations of 80% or more. In contrast, the neighborhoods north of Edgemont Cemetery are more integrated, with a population that is about 40% white, 50% African American, and 5% Latino.

The only tract outside of Anniston where more than 50% of housing is rented is in northwest Jacksonville. Jacksonville is one of the more diverse areas of Calhoun County outside of Anniston, and the population in the high-rental tract is also diverse, with a population that is about 60% white and 35% African American.

e. Discuss how patterns of segregation have changed over time (since 1990).

Figures 3, 4, and 5 provide racial and ethnic composition by block group for Anniston and the region in 1990, 2000, and 2010. They show that the current segregation patterns, specifically with respect to white and African American segregation between East and West Anniston, have existed for at least the last two decades.

The maps also indicate growing levels of diversity in some parts of the city, particularly Golden Springs, which was 93% white in 1990 but considerably more diverse in 2010, when white residents comprised 70% of the tract, African Americans made up 21%, Latinos 6%, and Asians/Pacific Islanders 3%. The tract to the east of Quintard Avenue from East 10th Street to East 22nd Street also became much more diverse from 1990 to 2010, moving from a population that was 84% white and 14% Black in 1990 to 40% white and 56% Black in 2010.

Some areas of the region also became more diverse over the last two decades – most notably, census tracts in Oxford and Jacksonville.

f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

Over the last two decades, Anniston's and the region's population became more diverse, while dissimilarity indices between all racial and ethnic groups declined. Assuming these overall demographic trends continue for the near future, the city would likely become less segregated

by2020. Revitalization efforts in West Anniston, increased fair housing education and enforcement citywide, and development of a mobility program to increase housing choice would also work to lower segregation levels in Anniston.

More generally, policies and practices with regard to the siting of subsidized housing and the use of housing choice vouchers has the potential to impact segregation levels in the future, but those impacts should primarily decrease or have no effect on segregation rather than to increase it.

The City of Anniston's zoning code includes a definition of family that limits related family members to include only those related by blood or marriage. This definition is out of date with current standards that also include those related by adoption or foster child/parent relationship. Under the code, no more than five persons not related by blood or marriage will qualify as a single family. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. In terms of the limit set at five persons, this definition is neither especially permissive nor restrictive, but has the potential to discriminate against families with adopted or foster children.   More permissive definitions of family define it in terms of a functional family or common household sharing common space, meals, and household responsibilities, or leaves maximum occupancy per dwelling as a matter of safety regulated by the building code rather than the zoning regulations.

2. **Additional Information**

   a. **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

Community input identified racial and ethnic segregation as the primary form of segregation present in Anniston and the region. Most meeting and interview participants noted a divide between the east and west sides of the city, with West Anniston being predominately African American and East Anniston being majority white, although with some more diverse areas. In describing what drives segregation in Anniston, community members identified a variety of reasons, including historical practices, economic conditions, cost of housing, household preferences, and mental barriers in terms of where residents consider as options to live. Others identified more direct reasons, such as steering by real estate agents, inability to obtain mortgage loans in West Anniston (and thus for existing homeowners to sell their properties), and issues related to environmental contamination in West Anniston. Regionally, stakeholders identified schools as a factor in housing choice, with many families with school-age children opting to live outside of Anniston city limits so as not to attend city schools. For housing choice voucher holders, finding a landlord that will accept a voucher impacts choice, and one meeting attendee noted that it can be difficult to use a voucher in Oxford and other parts of Calhoun County.

   b. **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.**

The most significant place-based investment with the potential to impact segregation levels in Anniston is revitalization in West Anniston. As discussed in the Racially and Ethnically Concentrated

Areas of Poverty (R/ECAPs) section, the West Anniston Master Plan completed in 2014 calls for addressing environmental issues and blight, improving housing choice, supporting economic development, and providing quality community facilities. Specific efforts identified in the plan include new investment around Cobb school, Carver Park, and the West 15th Street business district; redevelopment of Cooper Homes; and recreation space and residential development along the future Chief Ladiga Trail corridor. The City has completed improvements at Carver Park, and the Anniston Housing Authority has prepared Cooper Homes for demolition. The Housing Authority also applied to HUD for a Choice Neighborhood Planning Grant to assist with the community revitalization process.

3. **Contributing Factors of Segregation**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

   Priority Contributing Factors

   - Impediments to mobility
   - Lack of community revitalization strategies
   - Lack of private investment in specific neighborhoods
   - Location of environmental health hazards
   - Location and type of affordable housing

   Non-Priority Contributing Factors

   - Lending discrimination
   - Lack of regional cooperation

ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more.

Currently, the city of Anniston contains three contiguous R/ECAP census tracts (tracts 3, 5, and 6), that lie along the rail line running adjacent to Front Street and Grove Street (see Figure 8). Tract 3 is bounded by the rail line to the west, Blue Mountain Road to the north, Quintard Avenue to the east, and 15th street to the south. It lies immediately south of Edgemont Cemetery and includes Norwood Park and the Norwood Homes public housing community. The remaining two R/ECAP tracts lie to the west of tract 3 and are roughly bounded by the rail line, Grove Street, and Front Street on the east; 19th Street on the north; Dimple O'Neal Avenue, 9th Street, and 1st Avenue to the west; and the city limits to the south. They include several industrial sites (including the Solutia/Monsanto site); Carver, Lincoln, Glen Addie, and West Anniston parks; and three public housing communities (Glen Addie Homes, Constantine Homes, and Washington Homes). These R/ECAPs cover much of the West Anniston neighborhood, including the primary areas impacted by PCB contamination by Monsanto through the 1970s.

While there are no R/ECAPs in the Anniston HOME Consortium or region other than those in Anniston, small portions of Anniston's R/ECAP tracts extend beyond the city limits, including about 100 residents of Calhoun County outside of Anniston.

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

As Table 4 shows, the three R/ECAP census tracts are home to 6,956 residents (the vast majority of whom live in the city of Anniston (6,854 residents or 98.53%)). At the city level, African Americans are significantly disproportionately more likely to reside in an R/ECAP than other racial and ethnic groups. Black residents make up 80.29% of the R/ECAP population but only 48.15% of the population in the city. African Americans are 4.7 times as likely as whites to live in an R/ECAP and 3.7 times as likely as Latinos. All other racial and ethnic groups constitute smaller shares of the R/ECAP population than their shares of the population citywide.

At the HOME Consortium and regional level, the degree to which African American households disproportionately live in R/ECAPs is exacerbated. While Black residents make up 80.43% of R/ECAP population, they constitute only 20% of the population in the Consortium and region. Regionally, 23.14% of African Americans live in an R/ECAP, which is 17.8 times the share of white residents in the region that do so (1.30%).

Looking at familial status, 43.57% of families living in an R/ECAP have children. This share is somewhat above the shares throughout the city (37.24%), HOME Consortium (39.97%), and region (40.01%).

Only two foreign-born groups live within the R/ECAPs: Haitians (35 residents) and Mexicans (6 residents). Haitians make up 0.50% of the R/ECAP population, compared to 0.21% of city and 0.05% of the HOME Consortium. Of the 46 Haitians living in the HOME Consortium, more than three-quarters (76.09%) live in an R/ECAP.

Table 5. R/ECAP Demographics							
R/ECAP Race/Ethnicity	City of Anniston		Anniston HOME Consortium		Anniston-Oxford-Jacksonville Region	
	#	%	#	%	#	%
Total population in R/ECAPs	6,854	-	6,956	-	6,956	-
White, Non-Hispanic	1,126	16.43%	1,133	16.29%	1,133	16.29%
Black, Non-Hispanic	5,503	80.29%	5,595	80.43%	5,595	80.43%
Hispanic	100	1.46%	101	1.45%	101	1.45%
Asian or Pacific Islander, Non-Hispanic	11	0.16%	11	0.16%	11	0.16%
Native American, Non-Hispanic	18	0.26%	18	0.26%	18	0.26%
Other, Non-Hispanic	8	0.12%	8	0.12%	8	0.12%
R/ECAP Family Type	#	%	#	%	#	%
Total families in R/ECAPs	1,556	-	1,580	-	1,580	-
Families with children	678	43.57%	688	43.54%	688	43.54%
National Origin	Country	#	%	Country	#	%	Country	#	%
Total population in R/ECAPs		6,956	-		6,956	-		6,956	-
#1 country of origin	Haiti	35	0.50%	Haiti	35	0.50%	Haiti	35	0.50%
#2 country of origin	Mexico	6	0.09%	Mexico	6	0.09%	Mexico	6	0.09%

Note: The most populous groups at the city, HOME Consortium, and region levels may not be the same, and are thus labeled separately.

Source: Decennial Census; ACS

Figure 3. Racially and Ethnically Concentrated Areas of Poverty in the City of Anniston and the Anniston HOME Consortium, Current
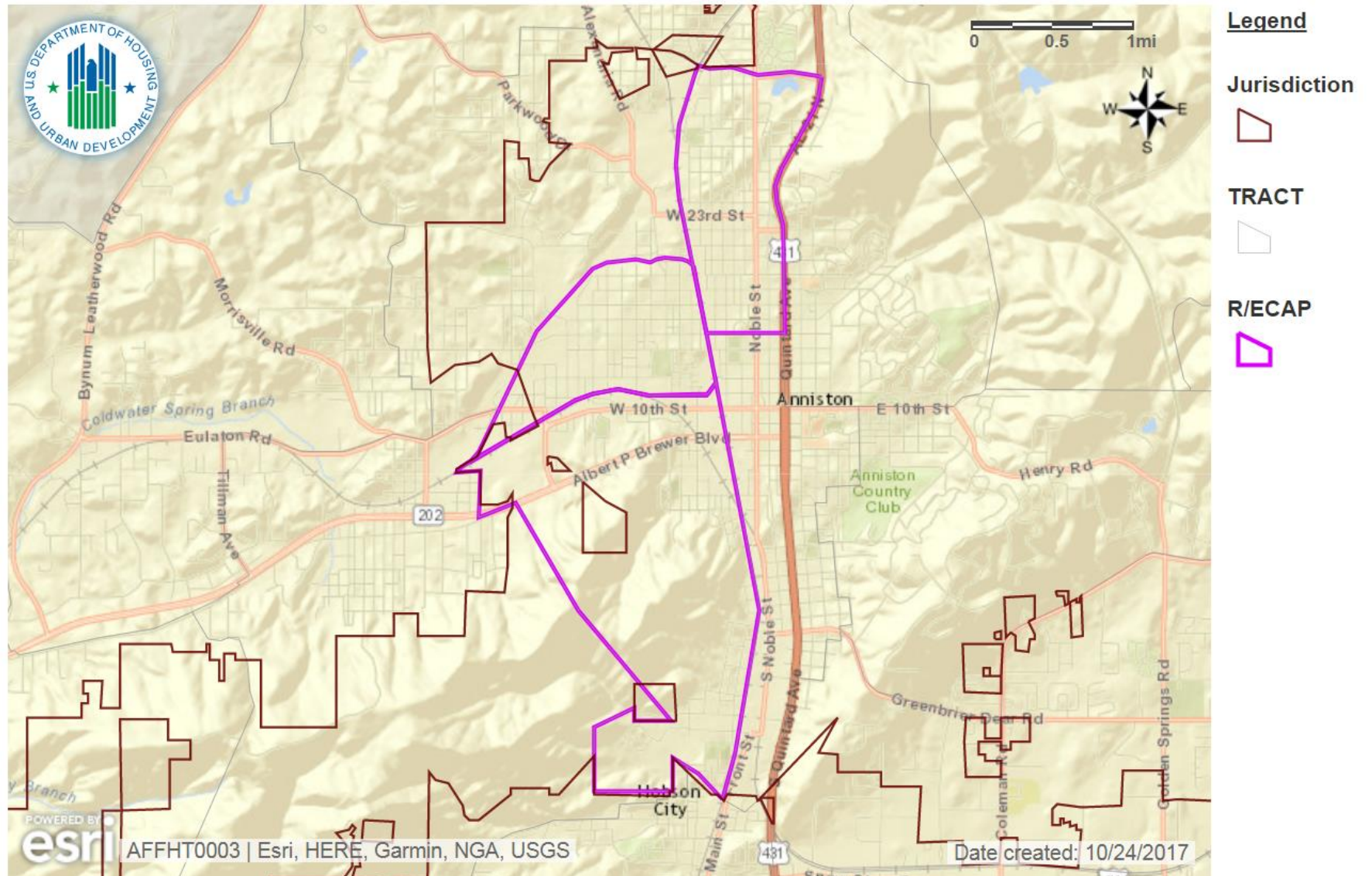
Figure 4. Racially and Ethnically Concentrated Areas of Poverty in the City of Anniston and the Anniston HOME Consortium, 2000
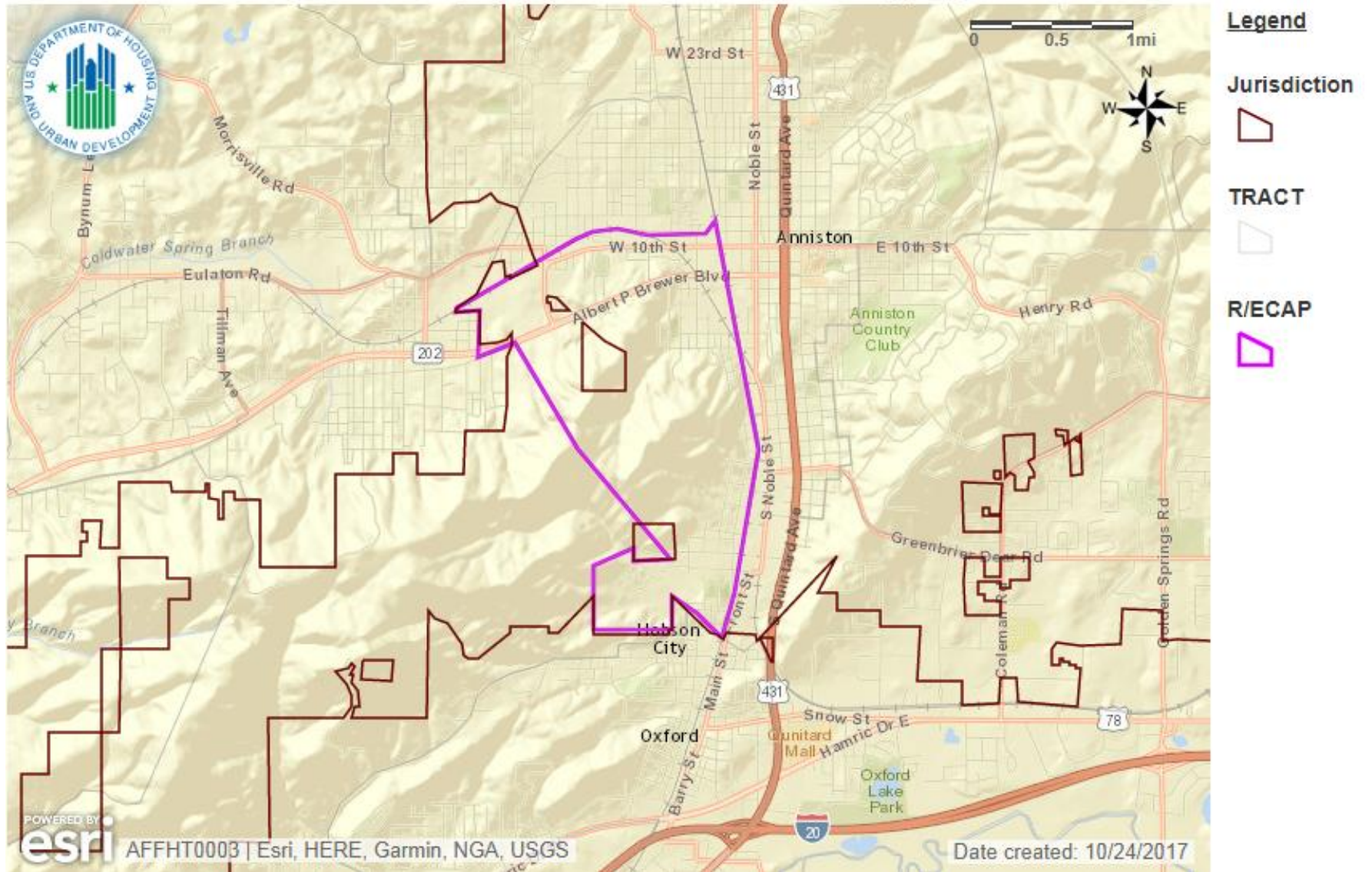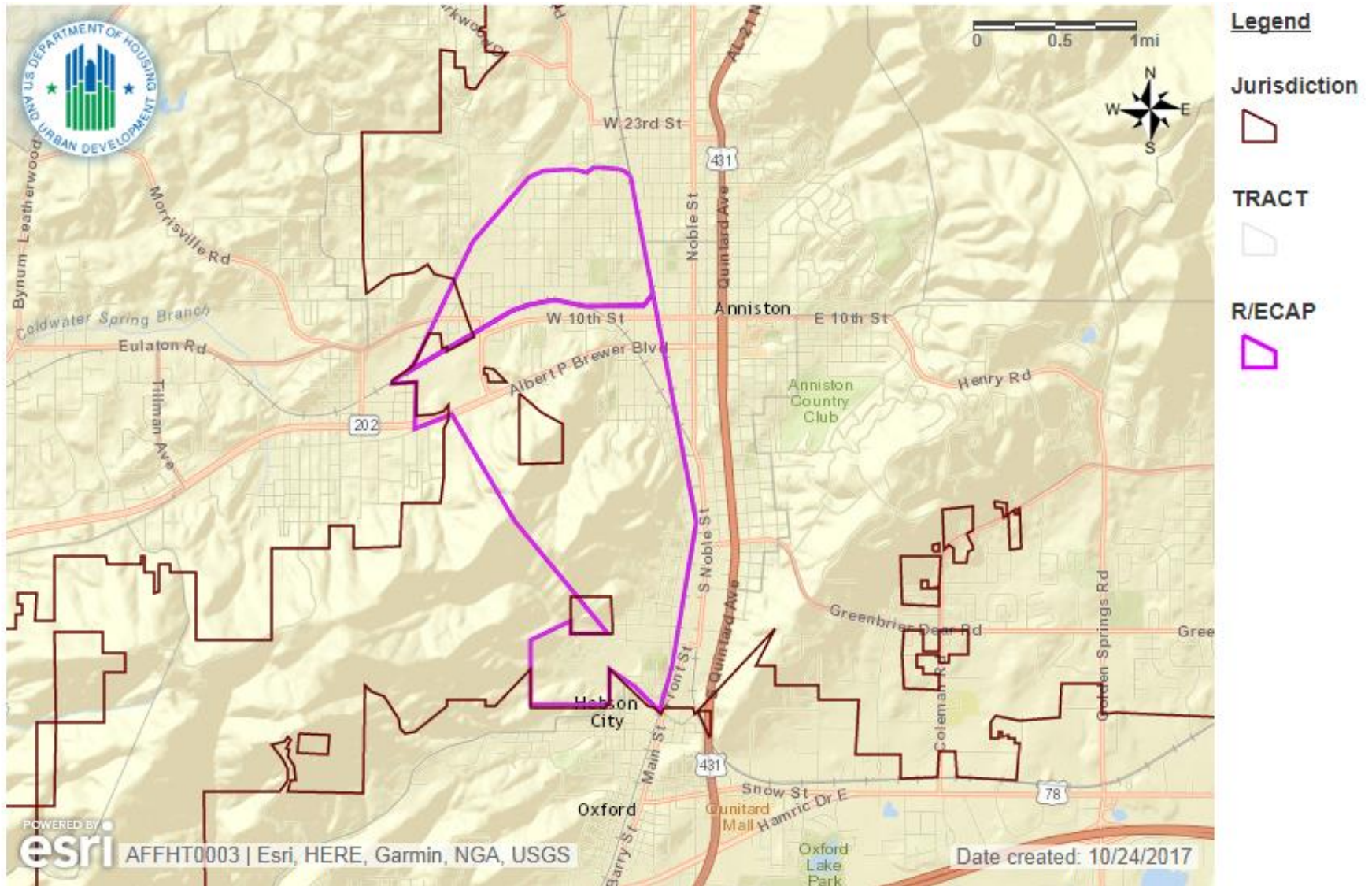
Figure 5. Racially and Ethnically Concentrated Areas of Poverty in the City of Anniston and the Anniston HOME Consortium, 1990

c. Describe how R/ECAPs have changed over time (since 1990).

Figures 8, 9, and 10 identify R/ECAP locations in Anniston and the Anniston HOME Consortium since 1990. Generally, they indicate that the West Anniston area has a recent history of high-poverty and settlement primarily by households of color. The racial composition maps discussed in the previous section (Figures 3, 4, and 5) show that African Americans made up the majority of R/ECAP population in each decade examined.

Some variation in R/ECAP geography did occur between 1990, 2000, and 2010. One tract – tract 6 in southwest Anniston – was an R/ECAP in each decade. This area is roughly bounded by 11th Street on the north, Front Street on the east, the city limits to the south, and large tracts of undeveloped land to the west. It includes Constantine Homes (constructed in 1954) and Glen Addie Homes (1940), which together provide 335 units of public housing.

In 1990, tract 5 (immediately to the north of tract 6) was also an R/ECAP. Together these tracts cover most of West Anniston. As of 2000, tract 5 no longer qualified as an R/ECAP, although it did again in 2010 and does according to current demographic information.

Compared to 2000, present day demographics show an R/ECAP expansion. In addition to tract 6 (which was an R/ECAP in 1990 and 2000) and tract 5 (an R/ECAP in 1990 but not 2000), tract 3 also qualifies, extending the geography north of 19th street (to Blue Mountain Road) and east of the railroad tracks (to Quintard Avenue).

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

The Census Bureau's 2011-2015 Five-Year American Community Survey (ACS) data provides additional information about two other protected classes – people with disabilities and female householders. According to the ACS, about one-third of R/ECAP residents have a disability (32.18%), which is above the city share of 24.55% and the regional share of 20.00%.

Additionally, R/ECAP households are considerably more likely to have female householders. Nearly two-thirds of households in R/ECAP census tracts have a female householder (65.77%). This share is well above that of the city (46.43%) and region (34.15%).

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

In 2014, the City of Anniston, the Anniston Housing Authority, and Anniston City Schools collaborated to complete the West Anniston Master Plan, which envisions physical redevelopment of the West Anniston neighborhood, one of the city's three R/ECAPs. Key goals for the strategy include addressing environmental issues and blight, improving housing choice, supporting economic

development, and providing quality community facilities. Efforts outlined in the plan will involve public and private investment around Cobb school, Carver Park, and the West 15th Street business district, along with redevelopment of Cooper Homes. The plan also envisions gateways, park space, and housing along the future Chief Ladiga Trail corridor. The City, housing authority, and school system anticipate coordinating efforts and investments over the next several years to make long-term improvements in the West Anniston neighborhood.

Since completion of the Master Plan, the City has made improvements to the Carver Community Park and Wellness Trail, and the City, Anniston Housing Authority, and Anniston City Schools have signed a cooperative agreement for revitalization in West Anniston. The Housing Authority also relocated residents of Cooper Homes in anticipation of its demolition. The Housing Authority recently applied for a HUD Choice Neighborhoods Planning Grant for revitalization in West Anniston in conjunction with redevelopment of Cooper Homes.

The City of Anniston has also made investments in West Anniston through its CDBG and HOME programs. In 2017, the City allocated $20,000 in funding to improve a sewer line and $268,000 to assist in the development of seven affordable rental units in West Anniston.

3. **Contributing Factors of R/ECAPs**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

   Priority Contributing Factors

   - Impediments to mobility
   - Lack of community revitalization strategies
   - Lack of private investment in specific neighborhoods
   - Location of environmental health hazards
   - Location and type of affordable housing

   Non-Priority Contributing Factors

   - Lending discrimination
   - Lack of public investment in specific neighborhoods
   - Lack of regional cooperation

iii. Disparities in Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. Average index values by race and ethnicity for the white of Anniston, the HOME Consortium area, and the Anniston-Oxford-Jacksonville MSA, and populations within each area living in poverty are provided in Table 5. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others.

Table 6. Opportunity Indicators by Race/Ethnicity							
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
City of Anniston Total Population							
White, Non-Hispanic	38.03	25.10	37.28	43.68	26.13	61.90	17.86
Black, Non-Hispanic	13.49	24.94	13.07	51.61	28.95	63.38	14.28
Hispanic	32.35	24.06	32.29	42.17	27.87	69.37	16.16
Asian or Pacific Islander, Non-Hispanic	42.93	25.76	44.68	43.75	27.65	60.94	17.29
Native American, Non-Hispanic	18.67	29.26	17.96	43.82	28.54	69.72	14.95
City of Anniston Population Below Federal Poverty Line							
White, Non-Hispanic	21.88	26.19	21.64	45.02	27.07	63.44	17.75
Black, Non-Hispanic	7.74	25.12	7.05	52.52	30.44	63.75	12.88
Hispanic	27.02	26.72	22.26	23.10	28.81	76.16	13.76
Asian or Pacific Islander, Non-Hispanic	53.16	21.72	56.64	45.49	28.86	55.33	16.10
Native American, Non-Hispanic	NA	NA	NA	NA	NA	NA	NA
Anniston HOME Consortium Total Population							
White, Non-Hispanic	36.05	51.77	24.82	21.78	13.67	47.85	33.12
Black, Non-Hispanic	24.09	38.53	17.06	37.74	22.82	57.40	23.39
Hispanic	36.18	52.26	25.66	19.57	17.58	60.56	29.01
Asian or Pacific Islander, Non-Hispanic	37.09	45.37	30.48	25.02	18.74	55.53	30.18
Native American, Non-Hispanic	31.22	51.63	21.37	24.96	14.87	49.17	31.65
Anniston HOME Consortium Population Below Federal Poverty Line							
White, Non-Hispanic	30.45	51.62	19.80	22.30	13.88	48.17	34.80
Black, Non-Hispanic	18.04	36.79	12.30	40.40	24.95	60.18	22.31
Hispanic	31.76	25.94	21.79	19.89	16.42	48.02	26.85
Asian or Pacific Islander, Non-Hispanic	48.35	20.38	40.20	21.85	17.78	51.57	31.13
Native American, Non-Hispanic	26.97	66.32	12.42	45.74	22.74	56.40	38.26

Table 5. Opportunity Indicators by Race/Ethnicity (continued)							
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Anniston-Oxford-Jacksonville Region Total Population							
White, Non-Hispanic	36.00	41.68	24.81	22.73	14.04	48.41	33.40
Black, Non-Hispanic	23.92	30.40	16.96	38.22	23.04	59.33	24.89
Hispanic	36.17	32.99	25.67	19.82	17.74	63.88	31.38
Asian or Pacific Islander, Non-Hispanic	37.10	36.61	30.53	25.21	18.85	57.51	31.04
Native American, Non-Hispanic	31.02	42.46	21.24	25.85	15.21	51.32	32.39
Anniston-Oxford-Jacksonville Region Population Below Federal Poverty Line							
White, Non-Hispanic	30.18	55.07	19.59	23.21	14.24	49.48	33.89
Black, Non-Hispanic	17.76	40.48	12.11	40.99	25.24	59.59	23.01
Hispanic	31.62	45.58	21.71	20.41	16.72	55.67	31.09
Asian or Pacific Islander, Non-Hispanic	55.92	20.38	50.33	36.42	26.29	51.57	22.63
Native American, Non-Hispanic	26.97	66.32	12.42	45.74	22.74	56.40	35.58

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

4. **Analysis**

   a. **Educational Opportunities**

   i. **Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.**

This school proficiency index is calculated based on performance of 4th grade students on state exams. It relies on attendance zones, if available, and otherwise calculates proficiency based on the performance of elementary schools within 1.5 miles of a block group's residents. Referring back to the index values broken down by race and ethnicity in Table 5, Anniston's white and African American residents have approximately equal access to proficient schools (index values of 25.10 and 24.94, respectively). Hispanic residents, with an index value of 24.06, were within a point of their fellow white and African American residents and Native Americans tended to live in neighborhoods with only slightly better access to good schools than all other racial and ethnic groups (index value of 29.26). However, when evaluating the region rather than the city alone, disparities begin to emerge. The virtually equal index values for white and African American residents of the city becomes a 13-point disparity between white and African American residents of the Consortium, with whites being significantly more likely to live in areas with access to proficient schools than their African American counterparts. In the region, Native Americans again claimed the highest index value (42.46), approximately 12 points higher than African Americans, who had the lowest level of access to proficient schools of all racial and ethnic groups in the region.

   ii. **Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.**

The maps on the following pages show HUD-provided opportunity scores related to education for Anniston's block groups, along with the demographic indicators of race/ethnicity, national origin, and family status. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

In Anniston, school proficiency is relatively low, an indicator somewhat uniformly distributed across the city. The highest index value in the city (a score of 58), meaning the area with access to the most proficient schools, is found in the neighborhood surrounding Pelham Park and the Cave Road corridor in northern Anniston. Elsewhere in the city, index values typically range in the 20s, both in predominantly white and predominantly African-American neighborhoods. Racial and ethnic disparities heighten when looking at the Consortium and the region. In Choccolocco, Jacksonville, and Oxford – all areas with significant concentrations of white residents, index scores ranged from the 70s in Jacksonville into the 90s in Choccolocco and Oxford.

Because school proficiency values are relatively flat across the city's geography, there are not large disparities in index values no matter the composition of the city's neighborhoods by race, ethnicity, national origin, or familial status. Clusters of foreign-born residents do exist within the city, notably of Haitian descent (between 15th Street and Blue Mountain Road, west of Quintard Avenue) and Chinese descent (in South and East Anniston), however, the school proficiency indices in these areas are not markedly different than those in other parts of the city. A similar phenomenon is true for families with children. These families are more likely to cluster in some parts of the city as opposed to others, but differences in school proficiency scores do not appear to drive these residency patterns.

iii. **Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?**

The statistical data presented in this section are further supported by input from stakeholders and residents who were engaged in the development of this assessment. Many acknowledged the relatively poor performance of Anniston's public schools, although some felt this reputation was more a matter of perception than fact. In any case, a consensus interpretation was that school-aged families in Anniston with the means to do so either move outside city limits to take advantage of neighboring school districts, or choose to remain in Anniston, but send their children to private schools. As a result, the quality of Anniston city schools has declined and the students attending them are largely students without a choice to attend other schools. While the school proficiency index for white residents is approximately equal to that of African Americans, the figures are more representative of the quality of public schools students are zoned for and not the schools they actually attend. Students least able to afford private schools in Anniston or to move outside the city tend to be racial and ethnic minorities, as these groups statistically have fewer financial resources and diminished mobility.

Figure 11. School Proficiency Index and Race/Ethnicity in the City of Anniston
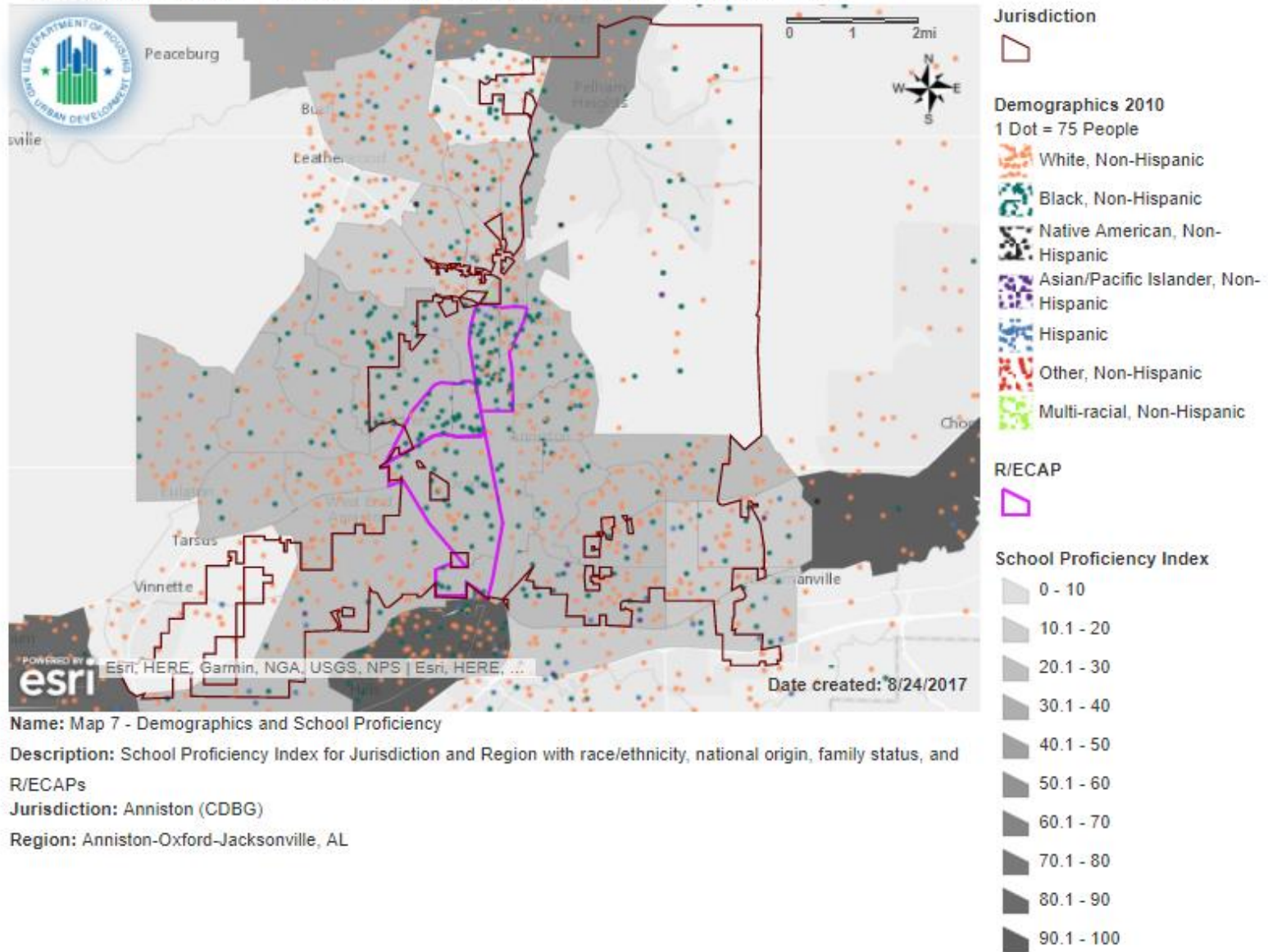
Figure 12. School Proficiency Index and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
Mexico
Thailand
Haiti
China excl. Hong Kong & Taiwan
Germany

R/ECAP

School Proficiency Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Name: Map 7 - Demographics and School Proficiency
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Date created: 8/24/2017
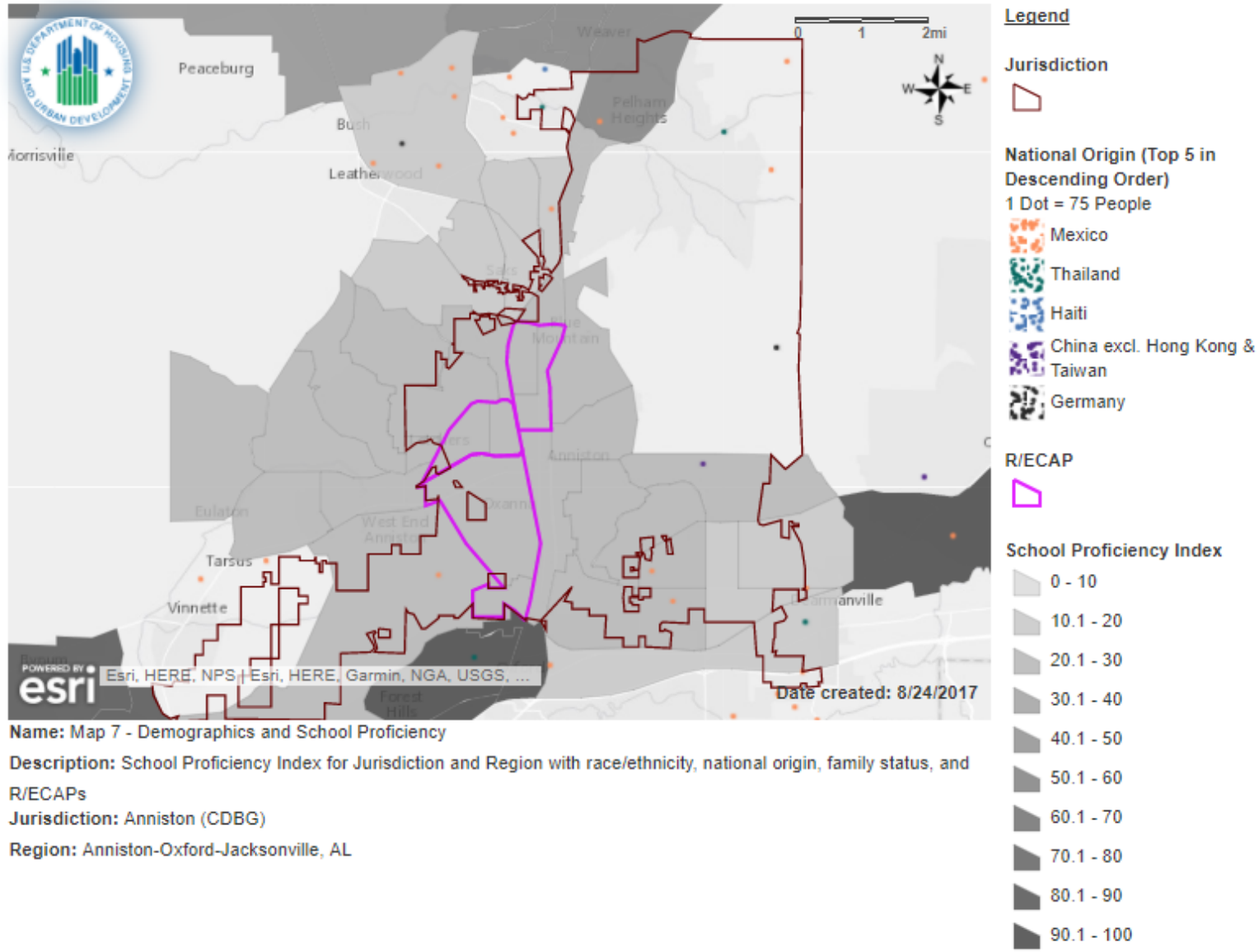
Figure 13. School Proficiency Index and Households with Children in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 7 - Demographics and School Proficiency
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Date created: 8/24/2017

Jurisdiction

% of Households that are Families with Children
- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

R/ECAP

School Proficiency Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100
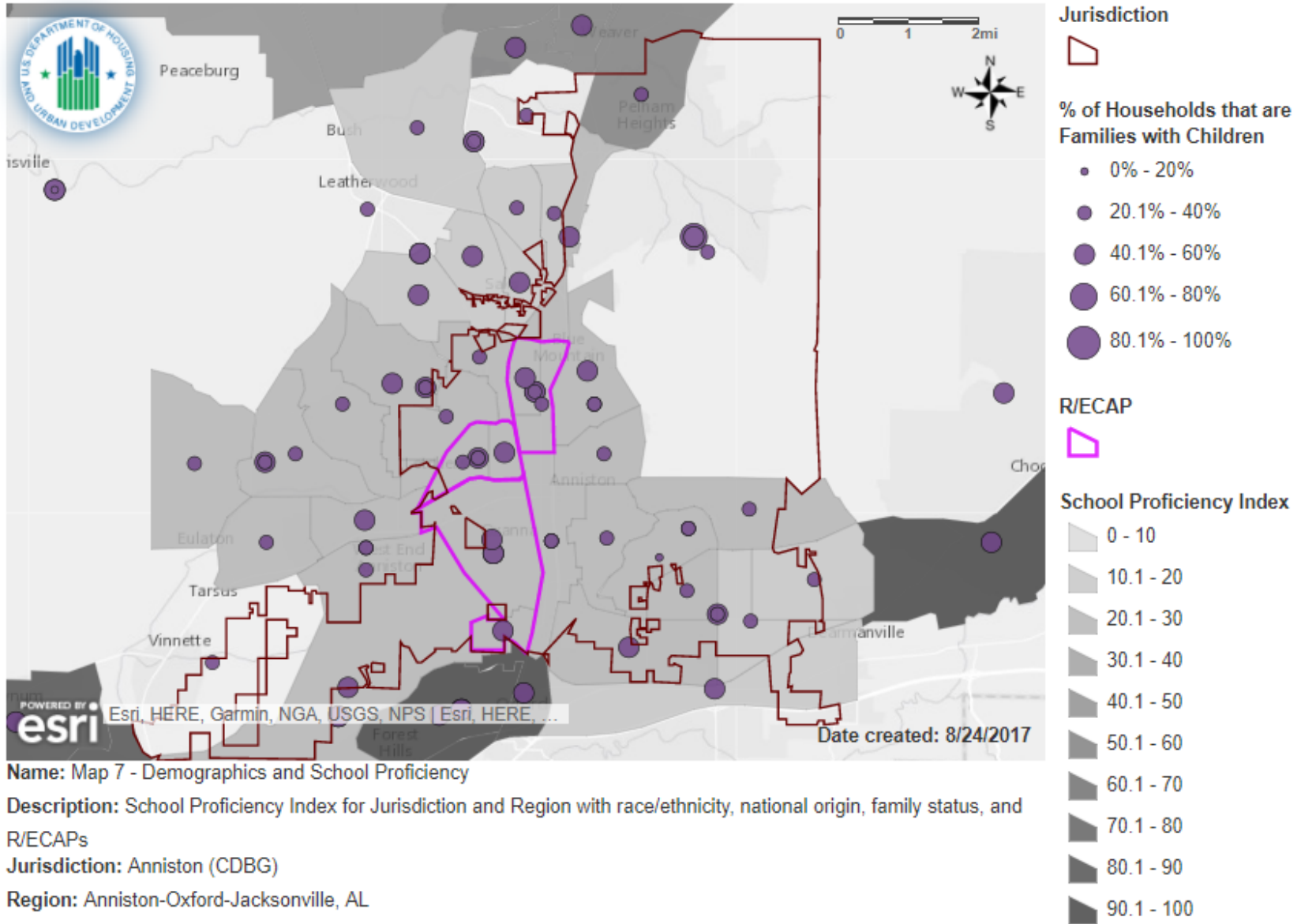
b. **Employment Opportunities**

i. **Describe any disparities in access to jobs and labor markets by protected class groups.**

Table 5 and Figures 11 through 16 provide data regarding access to jobs and labor markets by race and ethnicity, national origin, and familial status. The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Considering jobs proximity, index values for racial and ethnic groups residing within the city range from a high of 69.72 for Native Americans to a low of 60.94 for Asians. Index values for all other groups were within this 8.8-point spread. Poverty status does not appear to have a negative impact on access to job locations and, in fact, jobs proximity index values are higher for some populations below the federal poverty line. Poor white, Black, and Hispanic residents all tend to live closer to jobs than their populations at large. For the Consortium and the greater Anniston MSA, job proximity was reduced across the board for each racial and ethnic group studied. This is consistent with the city of Anniston containing more job opportunities than outlying areas, making jobs more likely to be nearby for those who live in the city.

While index values for jobs proximity are relatively high for most groups, measures of labor market participation are quite low. Scores for city residents range from a low of 13.07 for African American residents to 44.68 for Asians, meaning that Asian residents are more than three times as likely to live in neighborhoods with high levels of labor market participation than African American residents. Asians living in poverty were even more likely than Asians in general to live in neighborhoods with high labor market engagement, while the opposite is true for all other racial and ethnic groups. Comparing labor market participation scores between residents of the city and the Consortium and region yields mixed results, with some groups more and others less likely to reside in areas where many of their neighbors are employed. Perhaps the more important trend apparent in these comparisons is that a wide disparity persists between Asians (and to a lesser degree Hispanics, whites, and Native Americans) and African American residents. In the region, this gap ranged from a high of 30.53 for Asians to a low of 16.96 for African Americans, a difference of 13.57 points. For the Consortium, the gap between index values for these same two populations was 13.42 points.

ii. **How does a person's place of residence affect their ability to obtain a job?**

While neither employment index gauges Anniston residents' ability to actually obtain jobs, job proximity is likely to have an impact on employment opportunities, especially for low- and moderate-wage workers whose ability to afford transportation may be more constrained. Areas of greatest job proximity roughly follow the north/south route of Quintard Avenue and McClellan Boulevard through the city. By contrast, the largely undeveloped area of the city between US-78 and AL-202, East Anniston, and the McClellan areas have more limited access to employment opportunities. For those who are transit-dependent, living in close proximity to or near a bus route which connects easily to job centers with employment opportunities that match one's skill set is crucial. For someone living in the city, a job in suburban areas may require long bus rides or multiple transfers if accessible by transit at all. Persons with disabilities may also see their employment opportunities limited by the

availability bus or paratransit service. The lack of public transit service on Sundays and on weekday evenings after 6:00 p.m. can also affect riders' ability to take second or third shift jobs.

For low and moderate wage workers with personal automobiles, transportation costs may also affect job opportunities. Parking, fuel costs, and maintenance costs due to wear and tear on older cars can limit the distance employees are able to commute to work, and thus affect their ability to apply for jobs further from their residence.

Of course, physical proximity to places of employment does not make those nearby jobs accessible. Training, education, and other barriers may limit the accessibility of jobs that may be conveniently located, leading to diminished levels of workforce participation. Labor market participation ranges from as high a score as 74 in East Anniston, to multiple areas with scores under 10 in West Anniston, including each of the three R/ECAPs. The fact that East Anniston scores relatively low for jobs proximity but scores highly for labor market engagement underscores the disconnect between proximity and accessibility.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

The labor market engagement index shows that in the city of Anniston, African Americans are least successful in accessing employment. They live in neighborhoods that have, on average, a 24-point gap in labor market engagement when compared to whites, and a 32-point gap compared to Asians. Sizeable gaps persist when looking at persons in poverty. The average poor African American person lives in a neighborhood with a labor market engagement score that is 15 points below that of the average poor white person; compared with Asians, the gap widens to 50 points.

Figure 14. Jobs Proximity Index and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 8 - Demographics and Job Proximity
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL
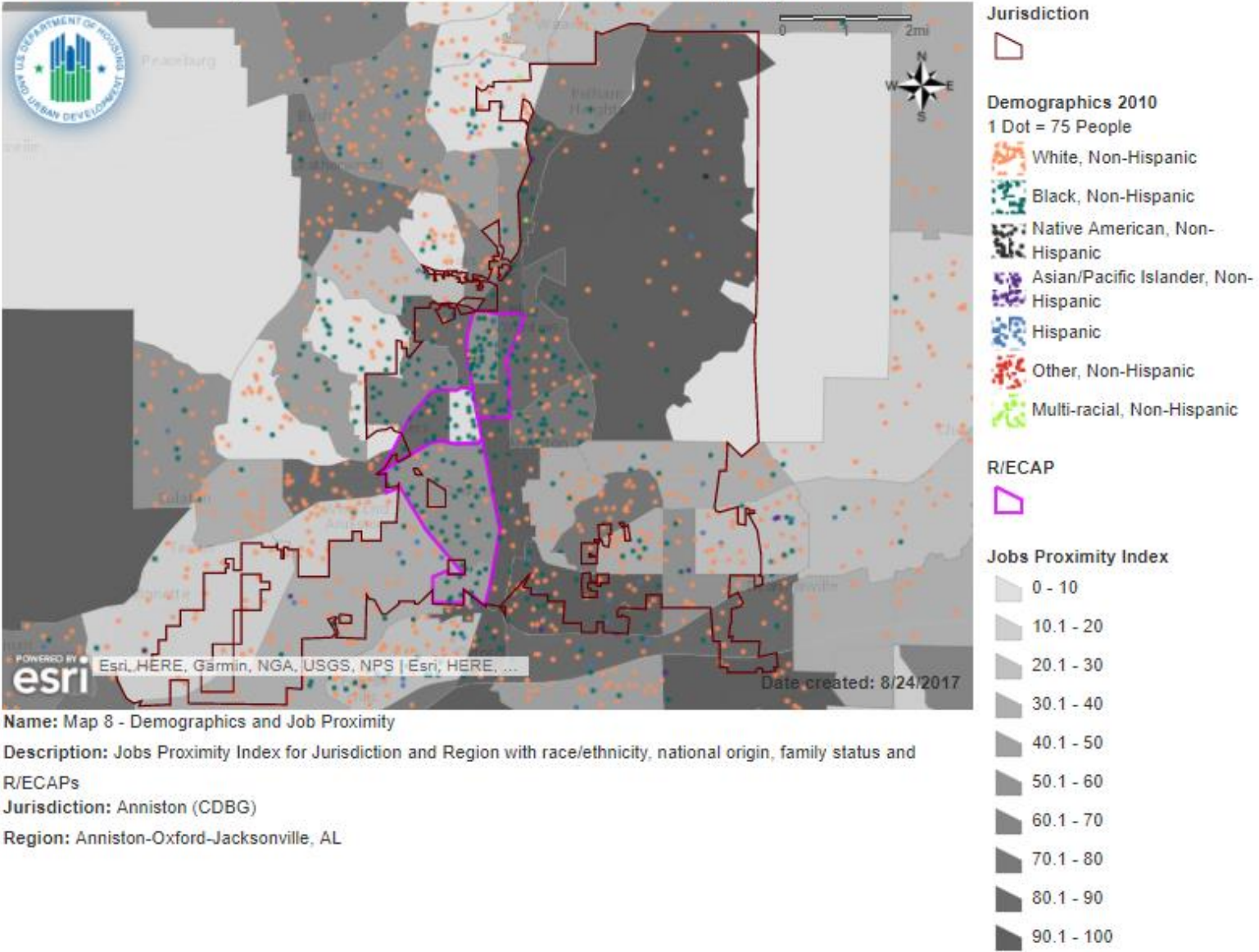
Figure 15. Labor Market Index and Race/Ethnicity in City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 9 - Demographics and Labor Market
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Jurisdiction

Demographics 2010
1 Dot = 75 People
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

R/ECAP

Labor Market Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Figure 16. Jobs Proximity Index and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People

Mexico

Thailand

Haiti

China excl. Hong Kong & Taiwan

Germany

R/ECAP

Jobs Proximity Index

0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Esri, HERE, Garmin, NGA, USGS, NPS | Esri, HERE, ...

Date created: 8/29/2017

Name: Map 8 - Demographics and Job Proximity
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 17. Labor Market Index and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People

- Mexico
- Thailand
- Haiti
- China excl. Hong Kong & Taiwan
- Germany

R/ECAP

Labor Market Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Date created: 8/24/2017

Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Anniston (CDBG)

Region: Anniston-Oxford-Jacksonville, AL

Figure 18. Jobs Proximity Index and Households with Children in the City of Anniston

Figure 19. Labor Market Index and Households with Children in the City of Anniston

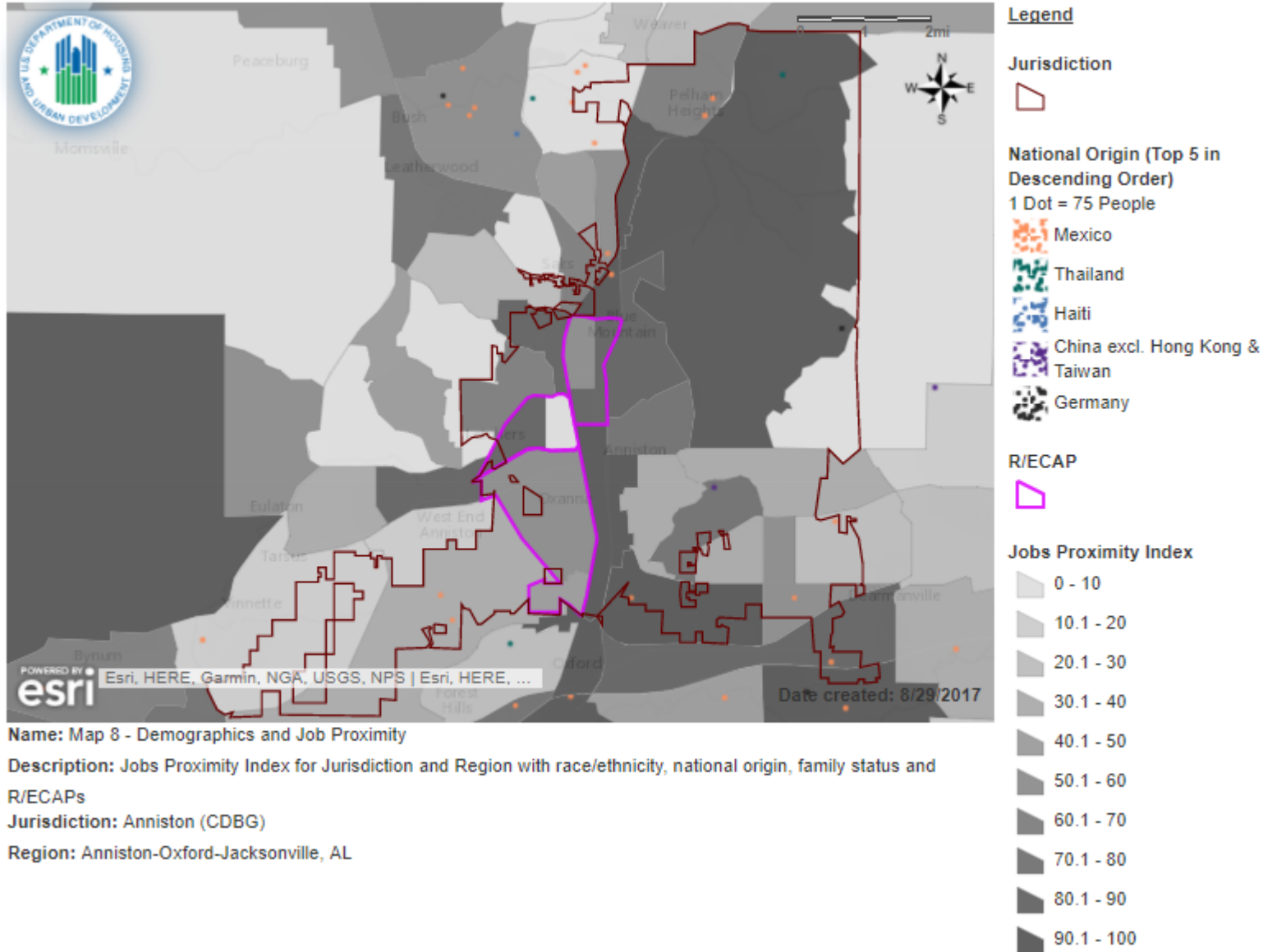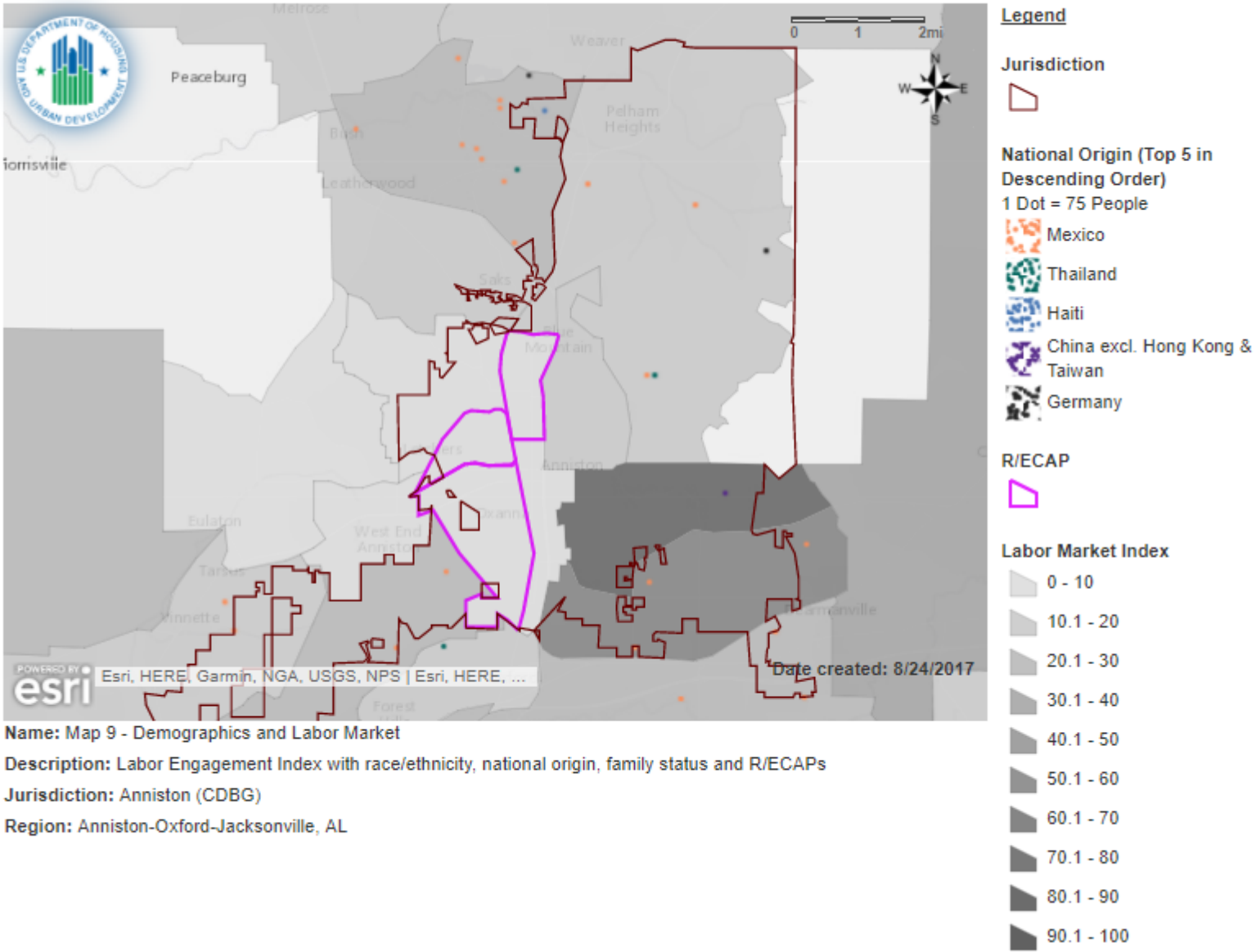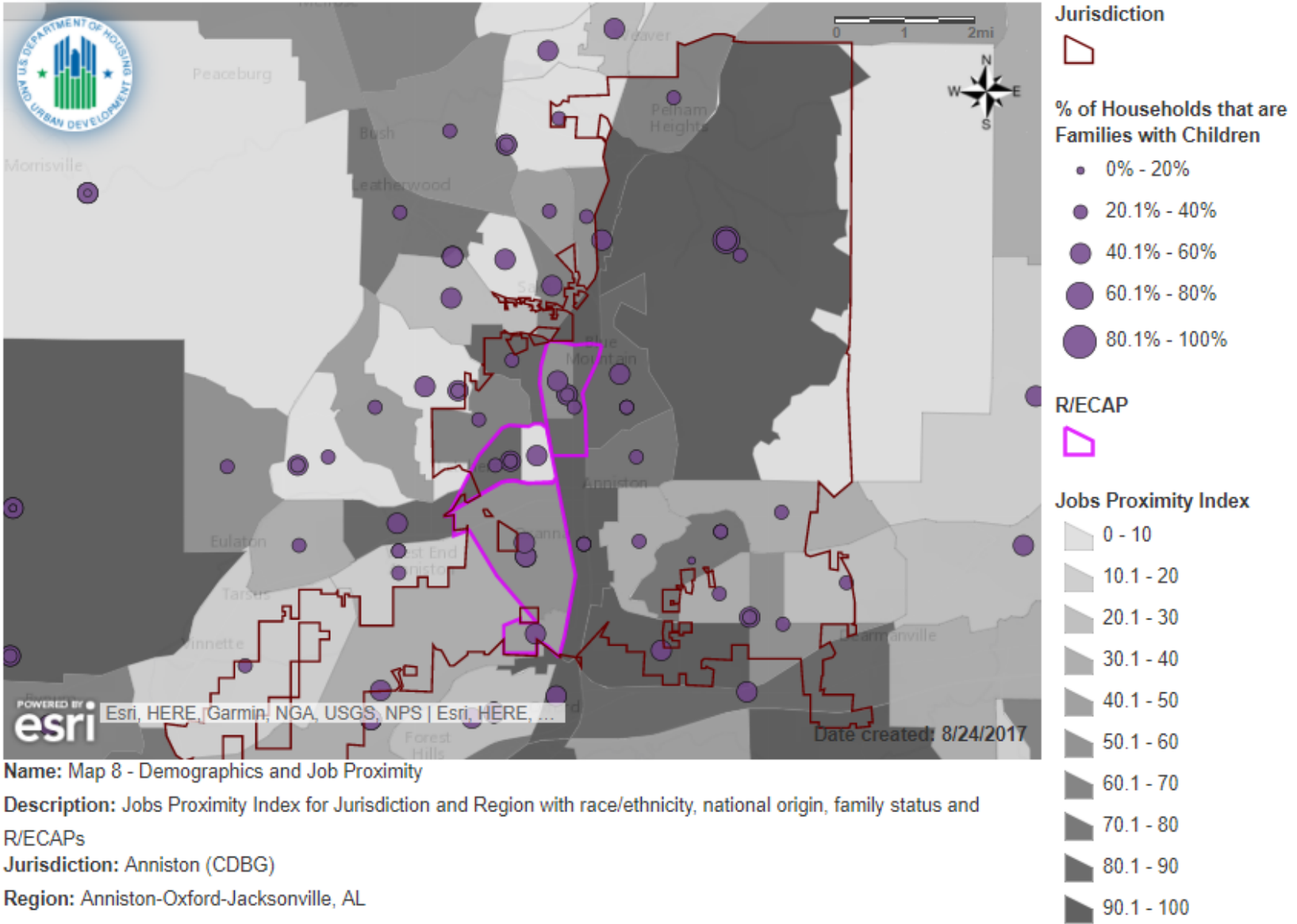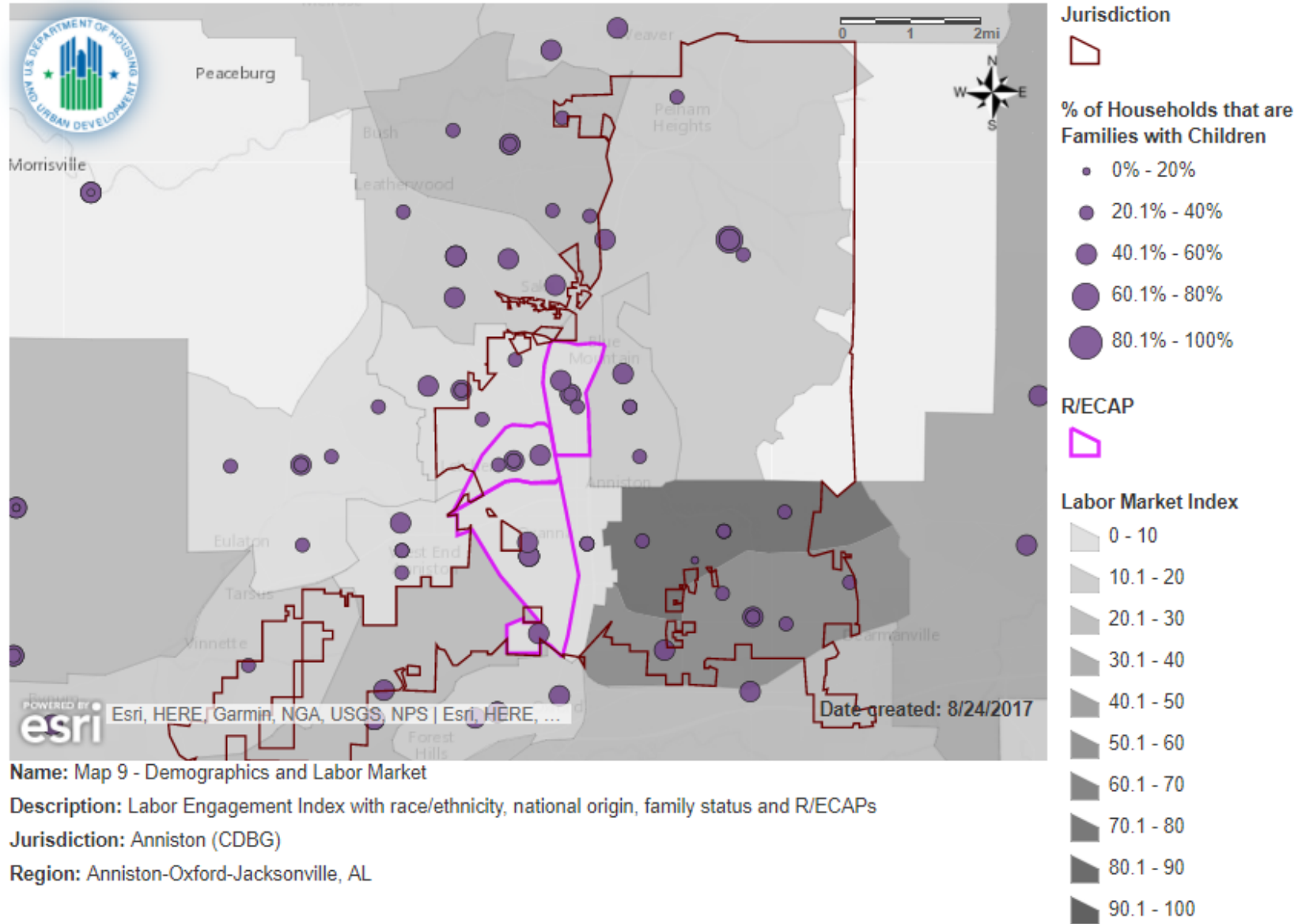HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 9 - Demographics and Labor Market
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

c. **Transportation Opportunities**

     i. **Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.**

Table 5 and Figures 17 through 22 provide data regarding access to transit and transportation costs by race and ethnicity, national origin, and familial status. The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Transit trip index values show that Anniston's African American residents tend to live in neighborhoods where residents use transit at slightly higher rates than other population groups. Whites, Asians, Native Americans, and Hispanics all lived in areas with about the same levels of public transportation usage by low-income families. Not surprisingly, people living in the city of Anniston are more likely to use transit than those in suburbs and outlying areas regardless of race, ethnicity, or income.

In terms of transit costs and access, there is little difference between index scores for any population segments in the city, falling between 26 and 29 for all groups. In the Consortium and the region, white residents have poorer access to low cost transit than do persons of color. This difference likely derives from the fact that the latter are more likely to live within the city where bus service is more accessible than in the less diverse suburban areas within the wider region.

     ii. **Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?**

Statistically, transit use, proximity, and cost is similar for city of Anniston residents regardless of race and ethnicity. People living outside of Anniston in areas such as Jacksonville and Piedmont are less likely to both use transit and to live near low cost transit options.

     iii. **Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.**

The Areawide Community Transportation System (ACTS) is coordinated by the East Alabama Regional Planning and Development Commission and offers fixed route bus service serving Anniston, Hobson City, Oxford, and Weaver. The system operates four fixed bus routes as well as a demand-response paratransit service. Weekday bus service runs from 6:00 a.m. to 6:00 p.m. and from 10:00 a.m. to 5:00 p.m. on Saturdays. Service is not offered on Sundays. According to the National Transit Database, ACTS provided 171,230 unlinked passenger trips in 2015 through its fixed route bus service and another 119,988 paratransit trips. Standard ACTS fare is $1 per trip, with a half-fare option available to children, the elderly, and Medicare and Medicaid recipients.

ACTS's affordable fares and reliable service help to increase the mobility of residents, providing options for accessing work, healthcare, and other destinations. Those who live in suburban and rural areas typically have greater transportation costs, likely due to the absence of public transit service

and the need to rely instead on personal vehicles. The cost to own and maintain a vehicle is prohibitive for many low-income families which can have the effect of limiting their housing choices only to areas with transit access.

Figure 20. Transit Trips Index and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Jurisdiction

Demographics 2010
1 Dot = 75 People
- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

R/ECAP

Transit Trips Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Name: Map 10 - Demographics and Transit Trips
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Date created: 8/24/2017

Figure 21. Low Transportation Cost Index and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 11 - Demographics and Low Transportation Cost
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 22. Transit Trips Index and National Origin in the City of Anniston
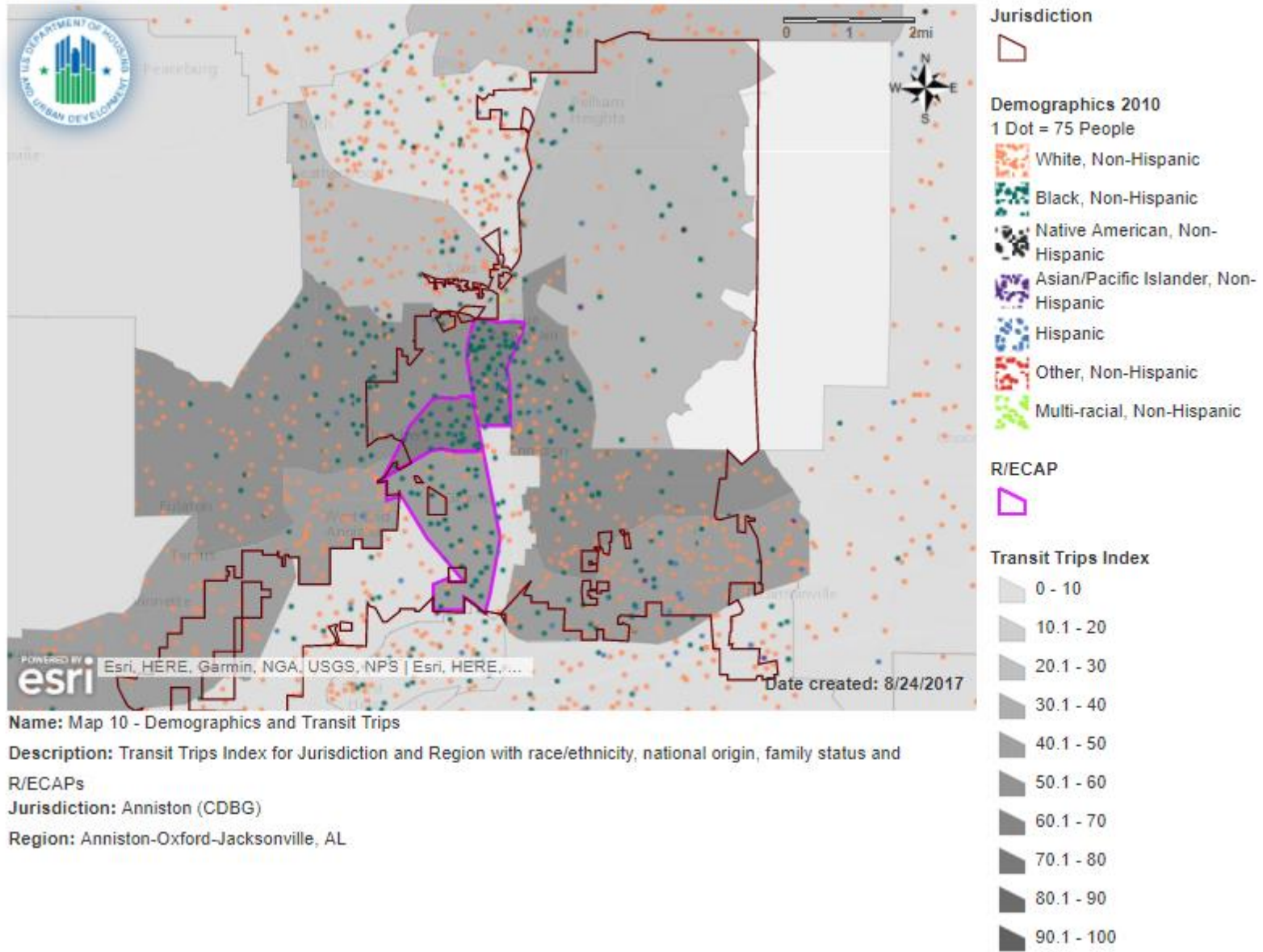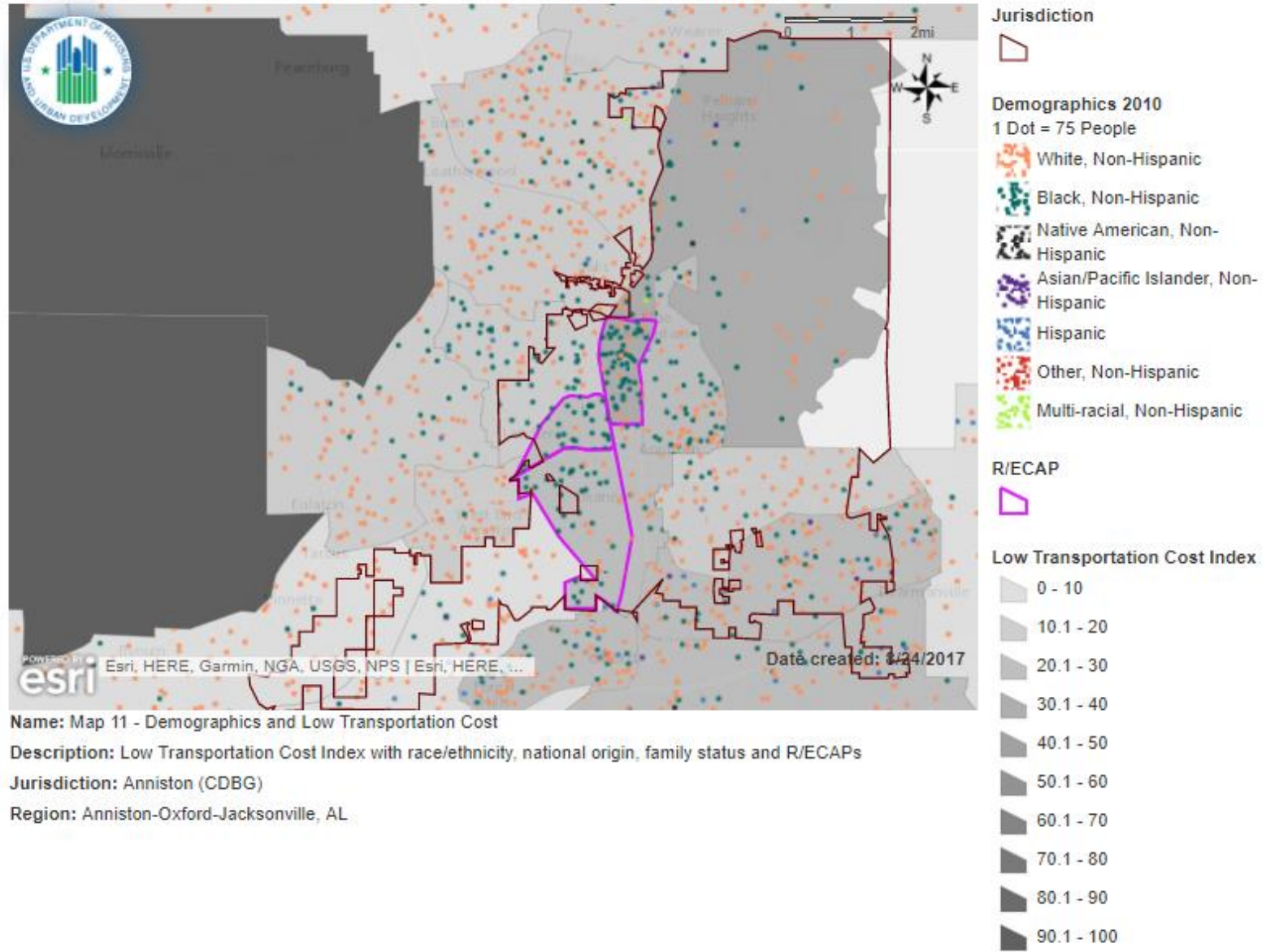
Figure 23. Low Transportation Cost Index and National Origin in the City of Anniston
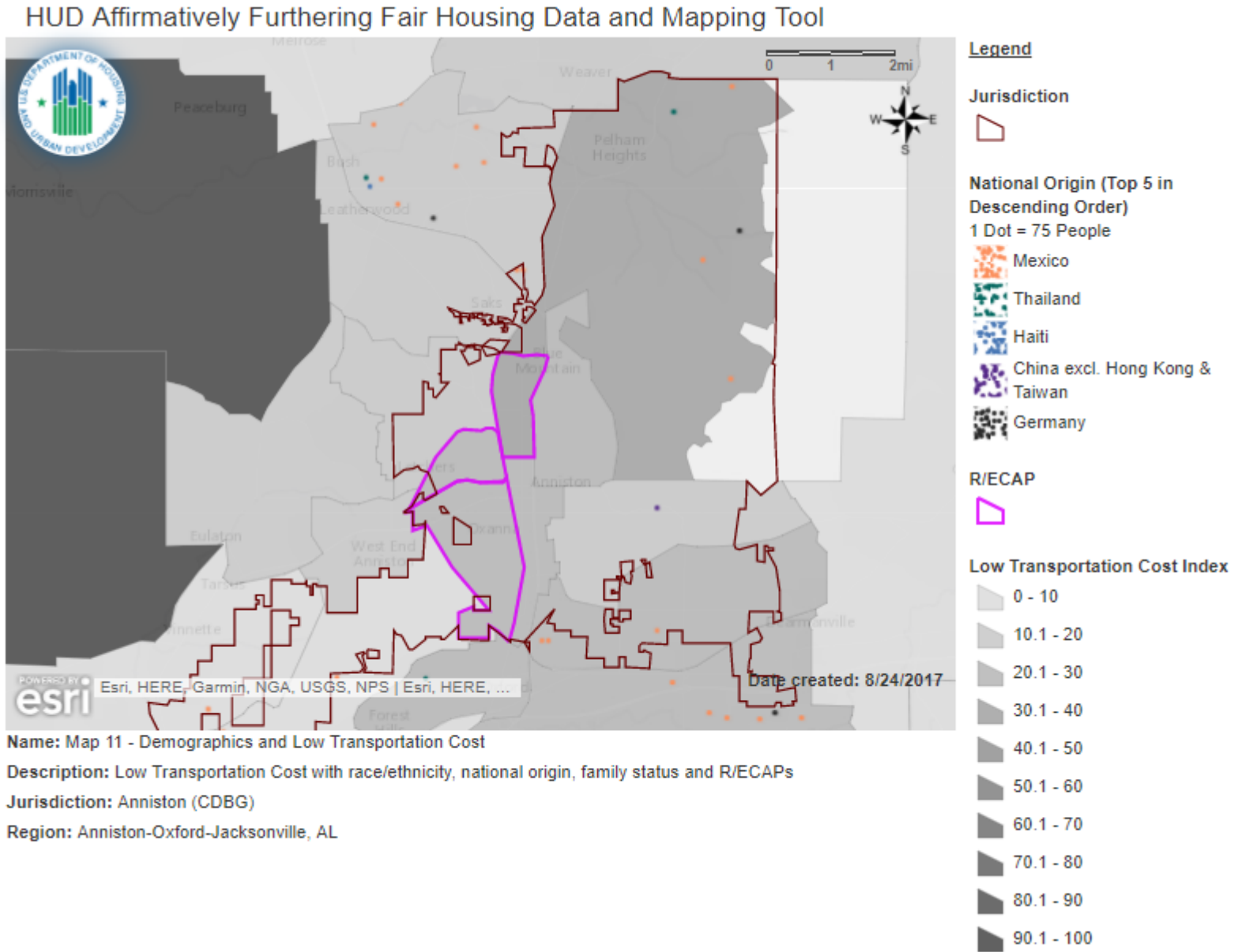
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
- Mexico
- Thailand
- Haiti
- China excl. Hong Kong & Taiwan
- Germany

R/ECAP

Low Transportation Cost Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Date created: 8/24/2017

Name: Map 11 - Demographics and Low Transportation Cost
Description: Low Transportation Cost with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 24. Transit Trips Index and Households with Children in the City of Anniston

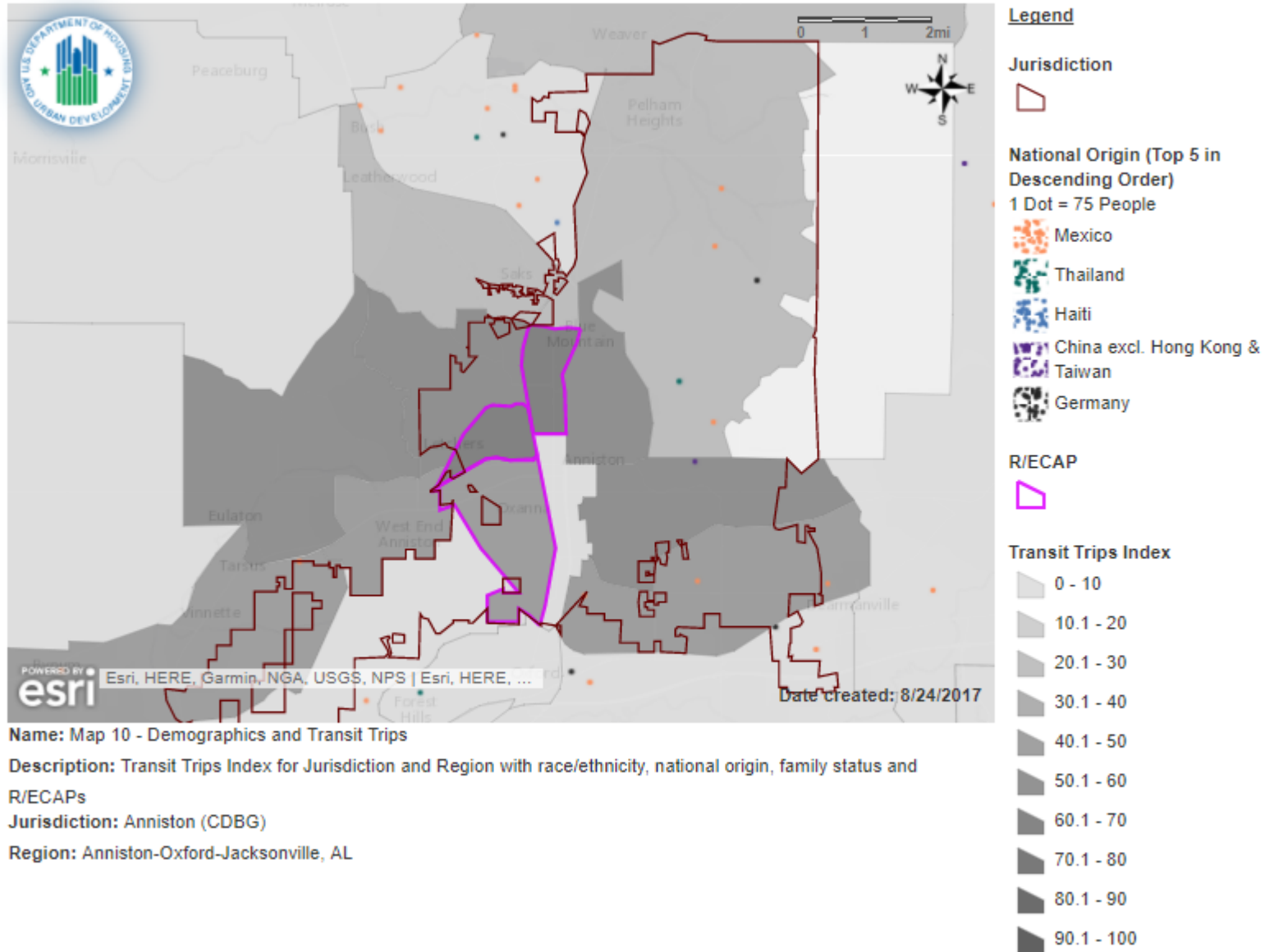HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 10 - Demographics and Transit Trips

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Anniston (CDBG)

Region: Anniston-Oxford-Jacksonville, AL

Jurisdiction

% of Households that are Families with Children
- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

R/ECAP

Transit Trips Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Date created: 8/24/2017

Figure 25. Low Transportation Cost Index and Households with Children in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

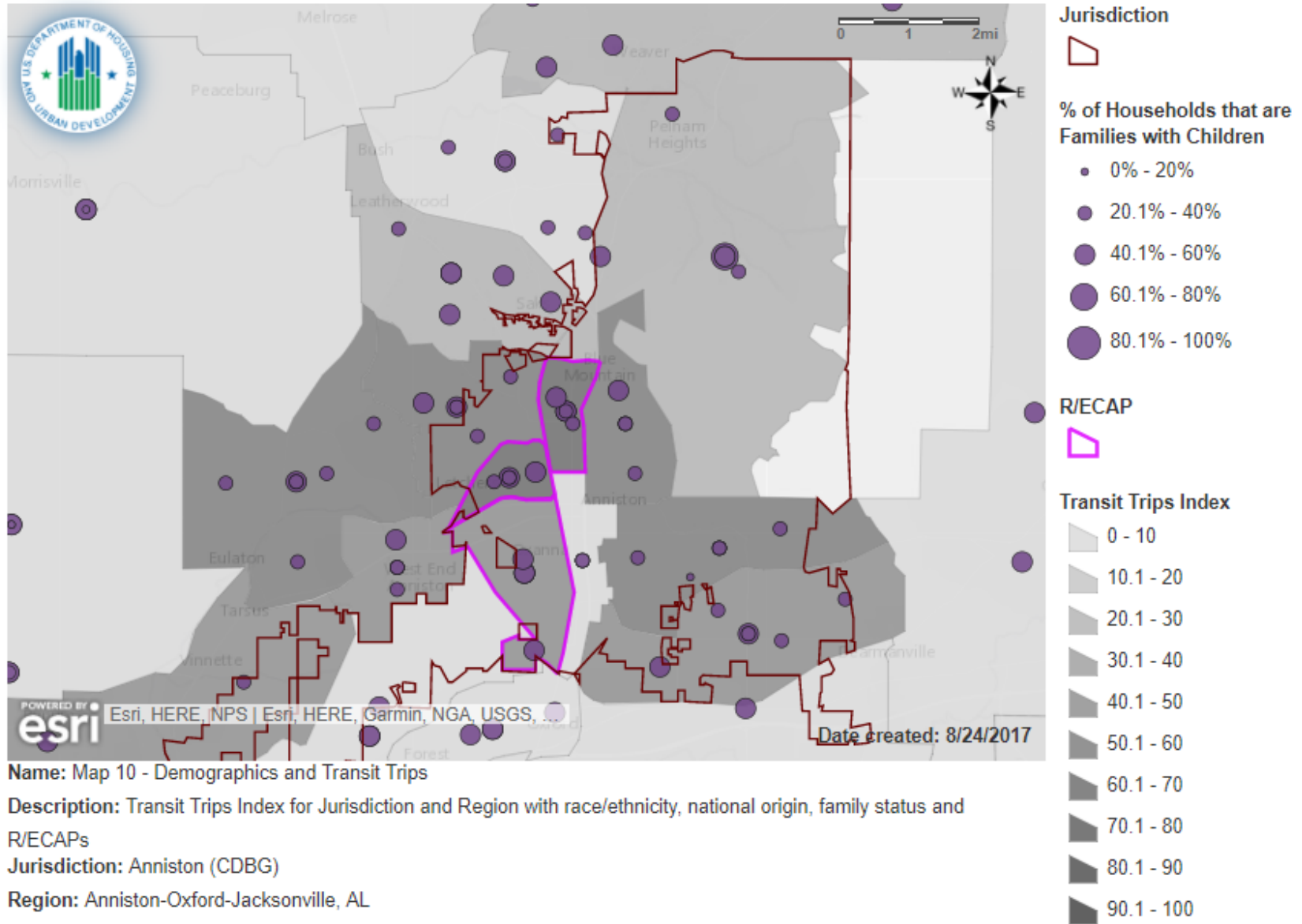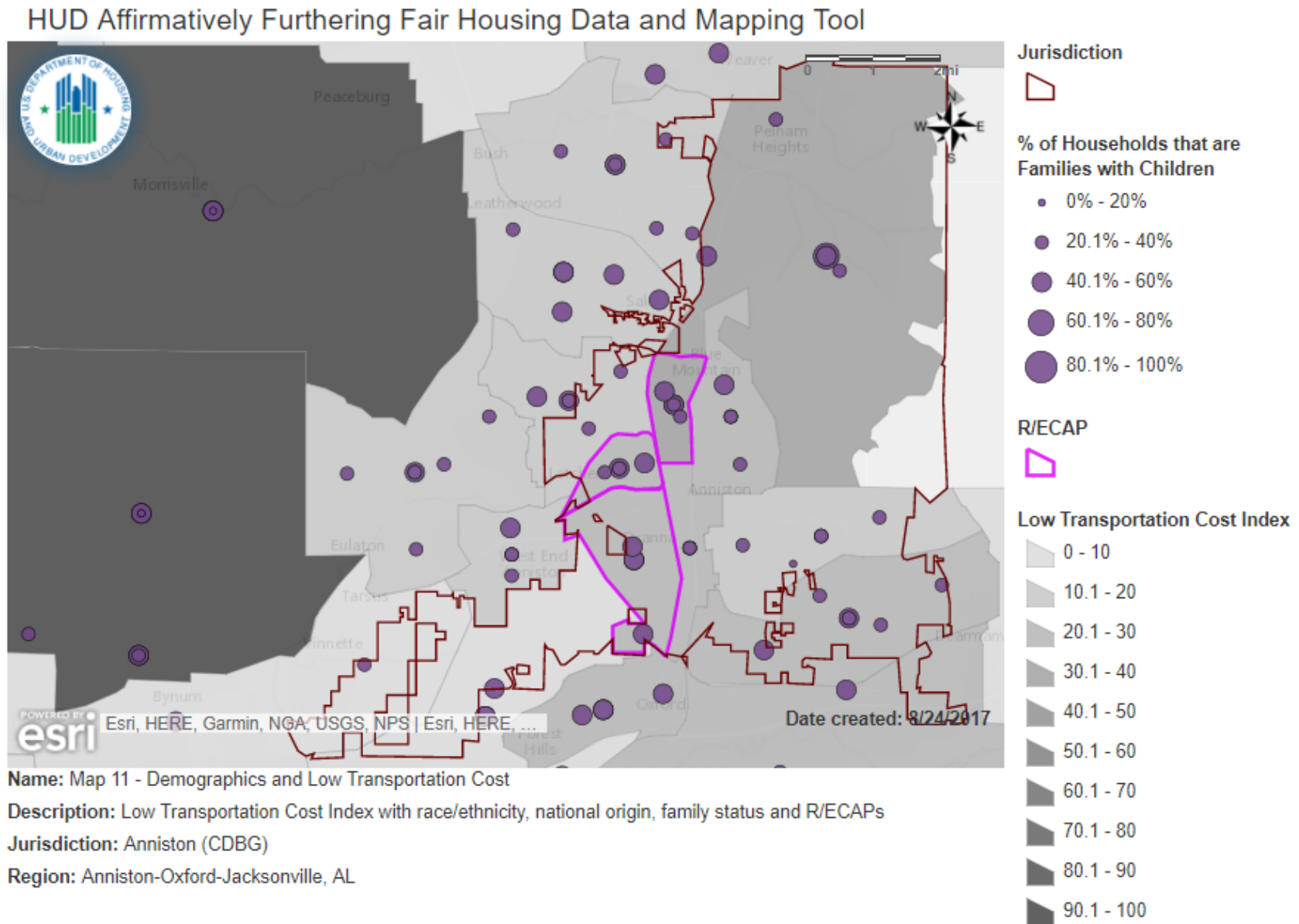Name: Map 11 - Demographics and Low Transportation Cost
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

d. **Low Poverty Exposure Opportunities**

    i. **Describe any disparities in exposure to poverty by protected class groups.**

The maps appearing in this section display data regarding poverty levels in the Anniston region. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

On average, African Americans and Native Americans live in areas with a higher exposure to poverty than do Asian, white, and Hispanic residents. In Anniston, Asians have a poverty index value of 42.93, compared to 13.49 for African Americans, 18.67 for Native Americans, 32.35 for Hispanics, and 38.03 for whites. The nearly 30-point disparity between Asians and African Americans shrinks to just 13 points when considering the Consortium and 13.18 points for the larger region. Consortium and regional figures show index values for all racial and ethnic groups more tightly clustered together, indicating less inequality in exposure to poverty by race and ethnicity within the region.

    ii. **What role does a person's place of residence play in their exposure to poverty?**

The maps that follow indicate that a person's place of residence can have a strong impact on their exposure to poverty. Most of the city's highest-poverty neighborhoods are located in central, west, and south Anniston. These areas, which all have low poverty index scores under 10 include many public housing developments owned by the Anniston Housing Authority (Norwood, Cooper, Washington, Glen Addie, Constantine). By contrast, the community surrounding Donoho School and along Hillyer High Road scored a 77 on the index; Edgefield and other Golden Springs neighborhoods also scored relatively well, with an index score of 53. Residents of these neighborhoods are far less likely to encounter neighbors living in poverty than residents of west Anniston.

    iii. **Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?**

African American and Native American residents of Anniston are more likely to encounter poverty in their neighborhoods than any other racial or ethnic group. Additionally, a cluster of Haitian residents are shown to live within a census tract between 15th Street and Blue Mountain Road, west of Quintard; this tract's low poverty index score is 5, indicating that these Haitian residents are more likely than other foreign-born residents to be exposed to poverty. Notably, the map detailing poverty index values for households with children shows that many of the highest-poverty census tracts in Anniston are also home to large shares of households containing children.

    iv. **Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.**

The City's policies directed at socioeconomic mobility for protected class groups that may be disproportionately impacted by poverty are primarily focused on improving access to opportunity. Efforts to reduce the number of families in poverty have included distribution of financial support to organizations that have a mission of assisting households in poverty and providing them with the skills and opportunities that can allow them to become self-sustaining. The City has historically allocated CDBG funds for programs that include Pre-K, after-school and summer educational opportunities for children and youth in low- and moderate-income families to provide a solid

foundation for high educational achievement which is correlated with reduced poverty. Funding is also allocated for a summer employment program for youth residing in Anniston to provide them with the skills and training necessary for success in the workplace.

Figure 26. Low Poverty Index and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 12 - Demographics and Poverty
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Jurisdiction

Demographics 2010
1 Dot = 75 People
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

R/ECAP

Low Poverty Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
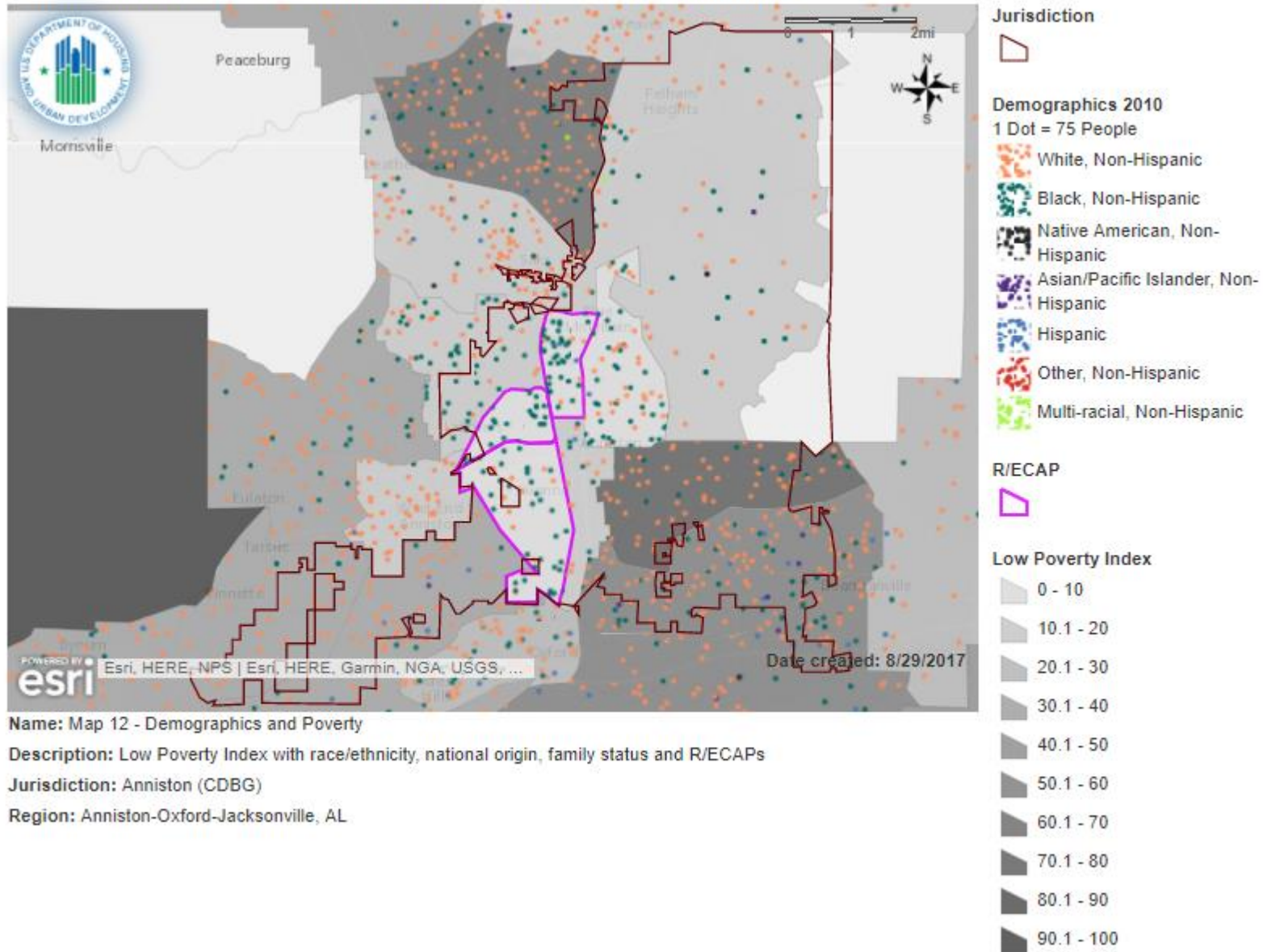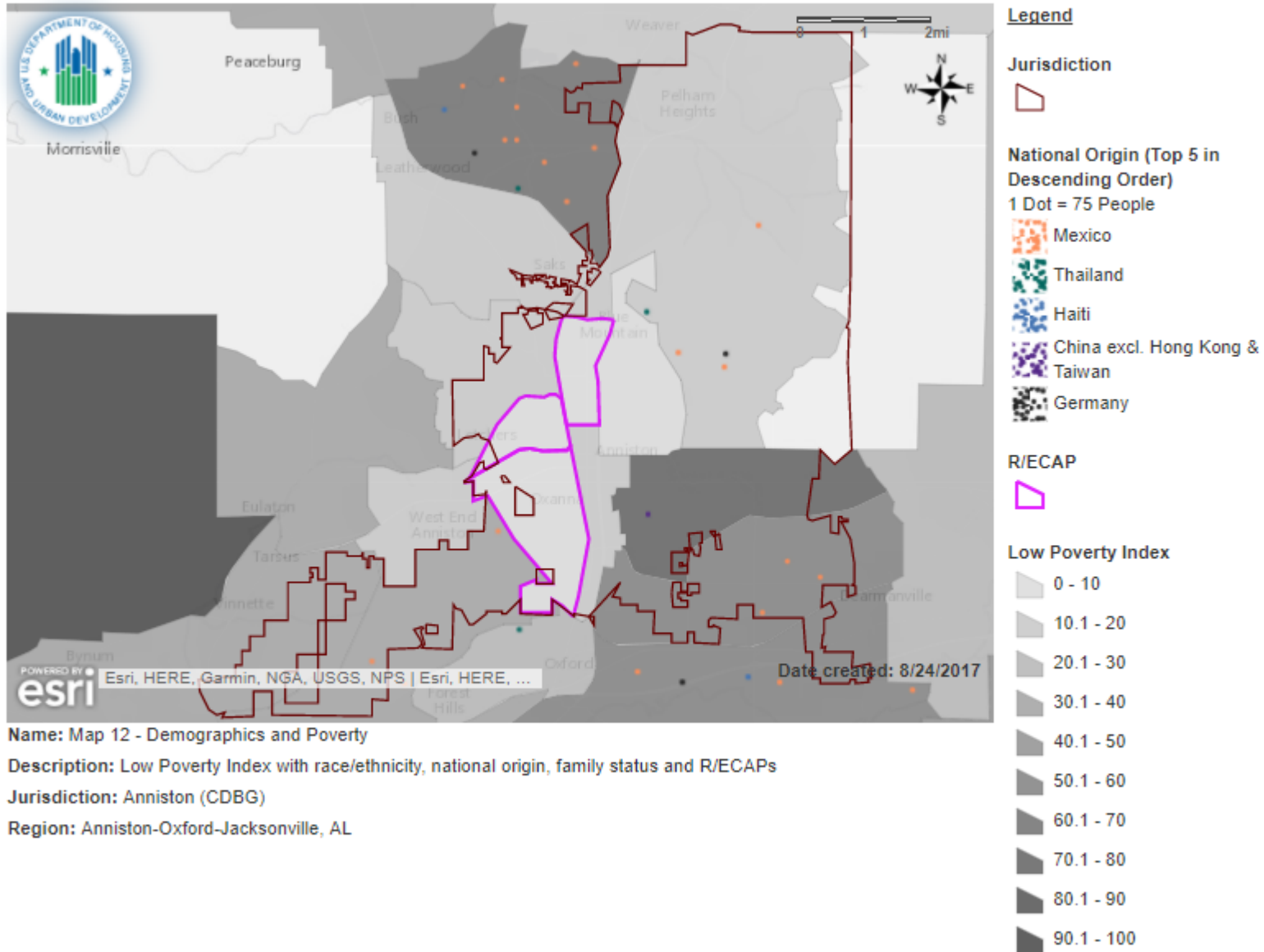40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Figure 27. Low Poverty Index and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
- Mexico
- Thailand
- Haiti
- China excl. Hong Kong & Taiwan
- Germany

R/ECAP

Low Poverty Index
- 0 – 10
- 10.1 – 20
- 20.1 – 30
- 30.1 – 40
- 40.1 – 50
- 50.1 – 60
- 60.1 – 70
- 70.1 – 80
- 80.1 – 90
- 90.1 – 100

Date created: 8/24/2017

Name: Map 12 - Demographics and Poverty
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 28. Low Poverty Index and Households with Children in the City of Anniston
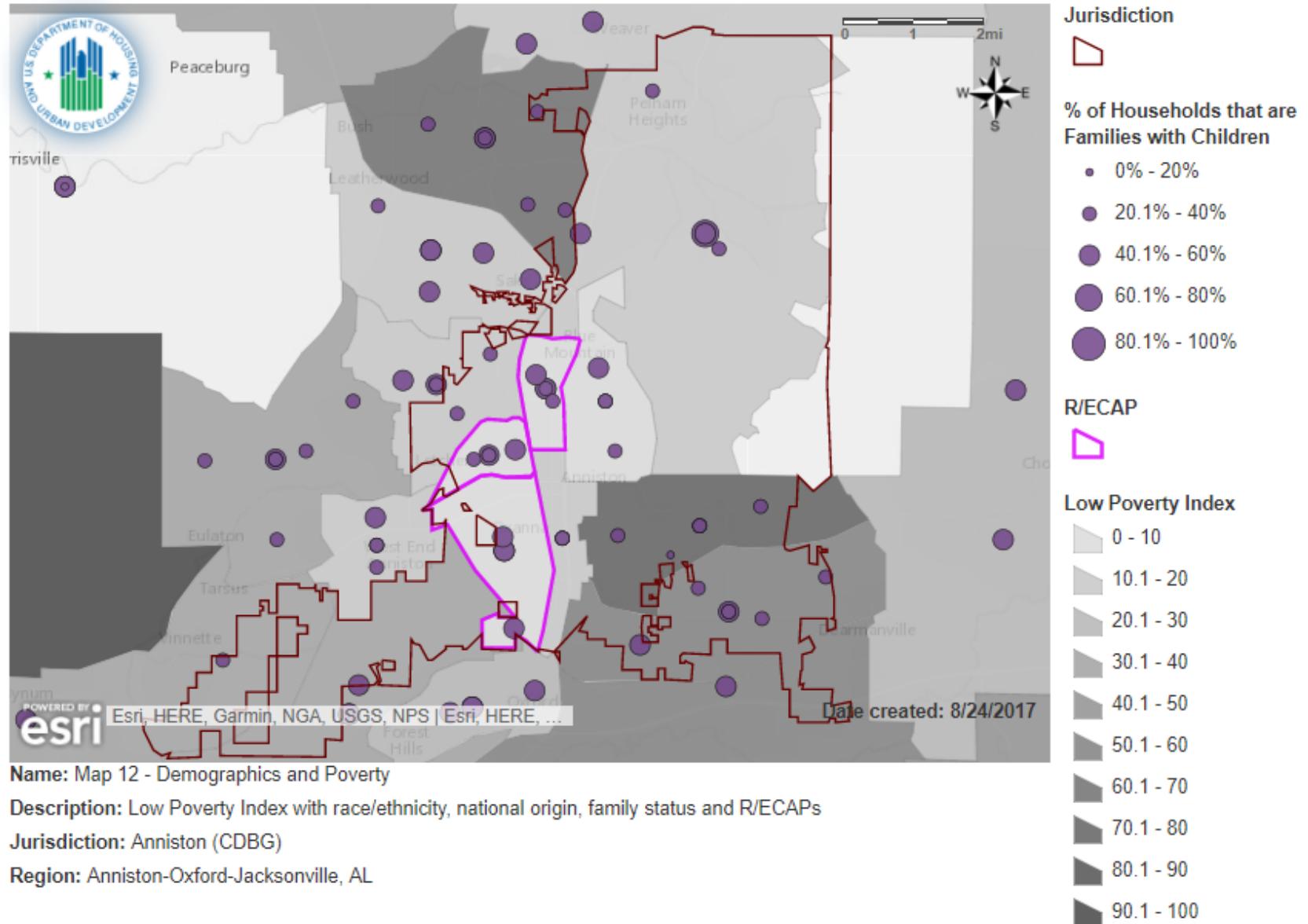

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 12 - Demographics and Poverty
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Jurisdiction

% of Households that are Families with Children
- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

R/ECAP

Low Poverty Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The maps in this section illustrate levels of exposure to environmental health hazards. HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

African American and Native American households within Anniston are slightly more likely to live in neighborhoods negatively impacted by poor air quality, however the degree of disparity is small (a maximum of 3.58 points separate white and Black households) and all racial and ethnic groups in the city are impacted by low levels of environmental health, with the highest index score being 17.86 out of 100. Environmental health index values increase markedly for the Consortium and slightly further still for the region, indicating that air quality is improved in areas outside Anniston. The 3.58-point disparity between white and Black residents of Anniston increases to 9.73 points for white and African American residents of the Consortium area and 8.51 points for the region as a whole. Other than the 24.89 index value for African Americans, all of the other population groups in the region have scores in the low 30s.

Importantly, the Anniston region has been affected by significant instances of environmental contamination that are not factored into HUD's environmental health index. As described previously, HUD's index is based only on measures of air quality and do not take into account contamination of soil, water, or other resources. However, two Superfund sites in the vicinity have resulted in soil and groundwater contamination; some of these effects have disproportionately affected protected classes.

The Anniston Army Depot (ANAD) lies about 10 miles west of Anniston's center in unincorporated Calhoun County. The site continues to be in active use by the Army and is a primary location for storage of munitions and refurbishment of various types of vehicles returning from combat. In the past, the site was used to store stockpiles of explosives and chemical weapons and, between the 1940s and 1970s was known to have disposed of acids and industrial chemicals in open, unlined trenches and lagoons on the site.[2] As a result, more than 25 different toxic substances are known to contaminate the soil and groundwater at the site, the most pervasive being a solvent called trichloroethylene, or TCE. Remediation is ongoing, and has included the removal of contaminated soil and groundwater, however, fractures in the bedrock beneath the site have allowed TCE to contaminate Anniston's municipal water supply, an intrusion the EPA acknowledges is not yet under control. The Army has installed equipment at the City's water treatment facility to remove TCE from

---

[2] U.S. Environmental Protection Agency: https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0400443

the water supply and periodic testing indicates the additional treatment measures are effective, however, migration of TCE from the site into Anniston's groundwater has not been stopped or stabilized.

A second Superfund site, this one in west Anniston within the city limits, is commonly referred to as the Monsanto site. Situated on about 70 acres just a mile west of downtown, a plant formerly belonging to Monsanto Corporation (and now known as Solutia, Inc.) produced polychlorinated biphenyls (PCBs) through 1971. Exposure to PCBs is linked to liver cancer, anemia, skin and kidney damage, and hormonal changes and manufacture of the chemical has been banned in the U.S. since 1977.[3] While in production at Monsanto's plant, PCBs were disposed of in landfills adjacent to the plant and discharged into a nearby creek, resulting in PCB-contaminated soil, sediment, surface water, groundwater, and air in Anniston and surrounding areas.[4] Some remediation measures have been completed, including the excavation and removal of contaminated surface soil layers at the site and on many privately-owned properties in the surrounding neighborhood. Feasibility studies are continuing in order to identify preferred cleanup plans for other manifestations of PCBs in the area.

In 2003, Monsanto and Solutia agreed to settle a lawsuit over the PCB contamination issue in Anniston for $700 million.[5] More than 20,000 Anniston residents were claimants in that matter and many west Anniston homeowners received cash payments out of the settlement funds, which they used to buy homes and move to other parts of the city. This left behind many abandoned homes in west Anniston, as buyers for the contaminated properties are scarce. Remaining residents may still be exposed to low levels of environmental pollutants that do not meet threshold requirements for remediation and are also impacted by blight resulting from a virtual cessation of investment in the neighborhood. Even today, stakeholders involved in this study described difficulties obtaining bank financing to buy or improve property in west Anniston.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Based on HUD's environmental health index, African American residents of the city of Anniston are marginally more likely than members of other racial and ethnic groups to live in neighborhoods affected by negative environmental factors. Within the Consortium and the larger Anniston region, this effect is magnified. Contamination of Anniston's municipal water source with TCE, though mitigated by added technology that removes pollutants from the water, has potential to affect all of Anniston's municipal water customers, an effect that would impact all residents regardless of their

---

[3] U.S. Centers for Disease Control, Agency for Toxic Substances and Disease Registry:
https://www.atsdr.cdc.gov/ToxProfiles/tp.asp?id=142&tid=26
[4] U.S. Environmental Protection Agency: https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0400123
[5] http://www.nytimes.com/2003/08/21/business/700-million-settlement-in-alabama-pcb-lawsuit.html

protected class status. However, the other soil and water contamination issues described above primarily impact African American residents. The Monsanto site is located in an R/ECAP with a population that is 64.15% African American. In addition to heightened exposure to toxins in the environment, these primarily Black residents also bear the brunt of the blight and economic decline facing west Anniston as a result of the contamination.

Exposure to environmental contaminants for the city's foreign-born residents is minimal. The most prevalent foreign-born population segment in west Anniston are people of Mexican origin, however this group makes up less than one percent of the population of the tract containing the Monsanto site. In that same tract, 49% of households are families with children while the average for the city is 37%, meaning families with children may face disproportionate effects of the environmental contamination.

Figure 29. Environmental Health Index and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 13 - Demographics and Environmental Health
Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Jurisdiction

Demographics 2010
1 Dot = 75 People
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

R/ECAP

Environmental Health Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
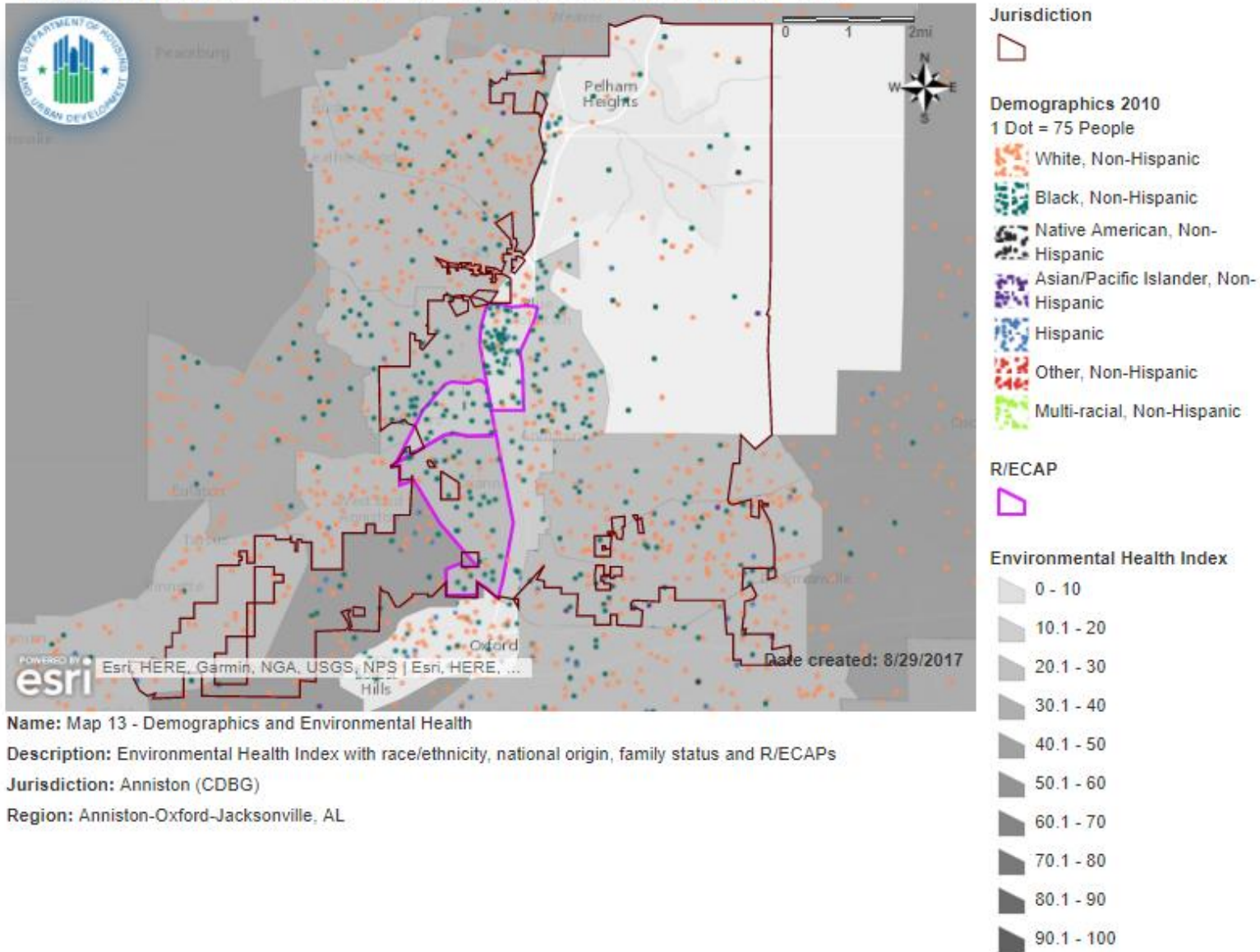50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Figure 30. Environmental Health Index and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 13 - Demographics and Environmental Health
Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
Mexico
Thailand
Haiti
China excl. Hong Kong & Taiwan
Germany

R/ECAP

Environmental Health Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
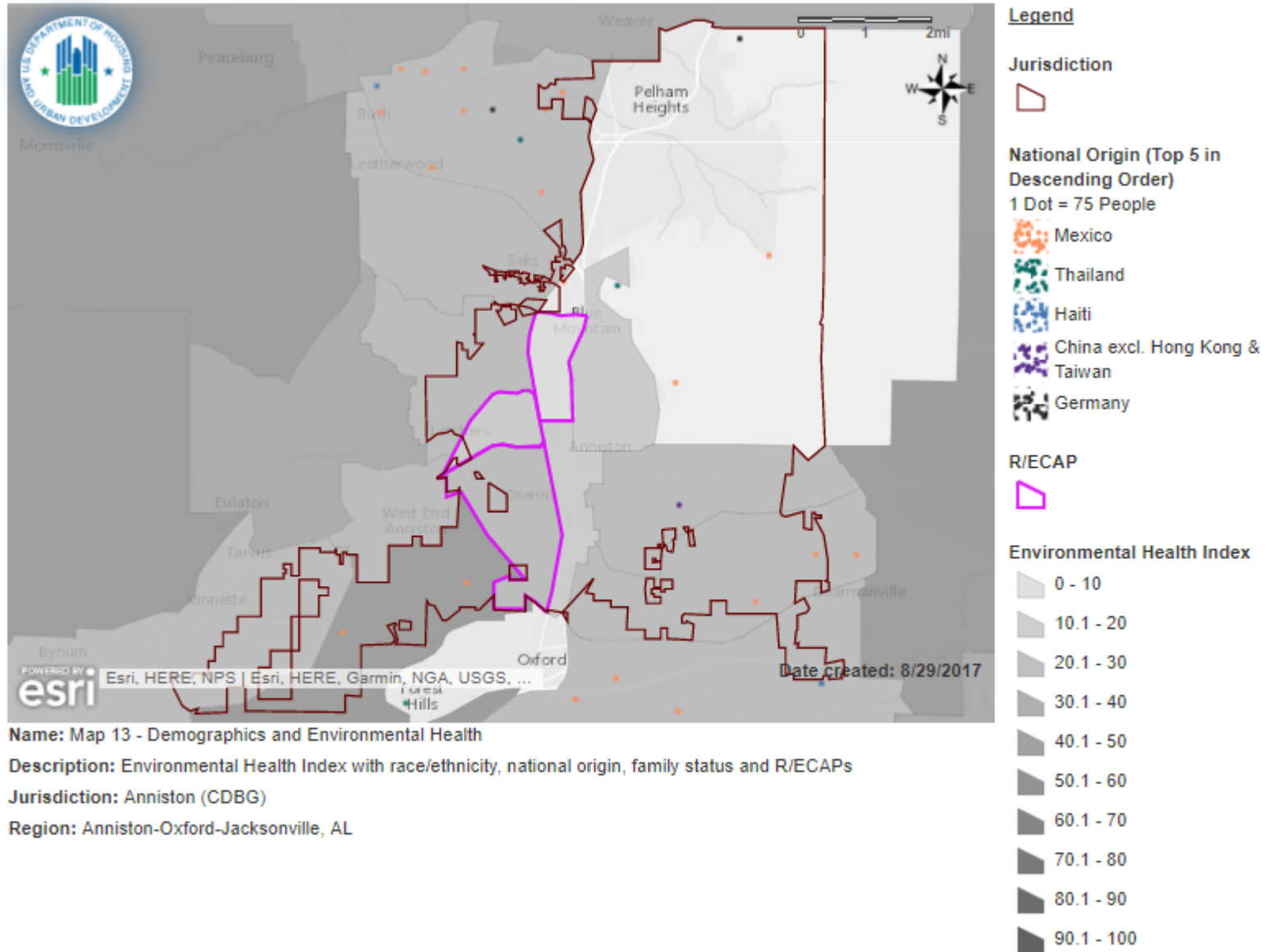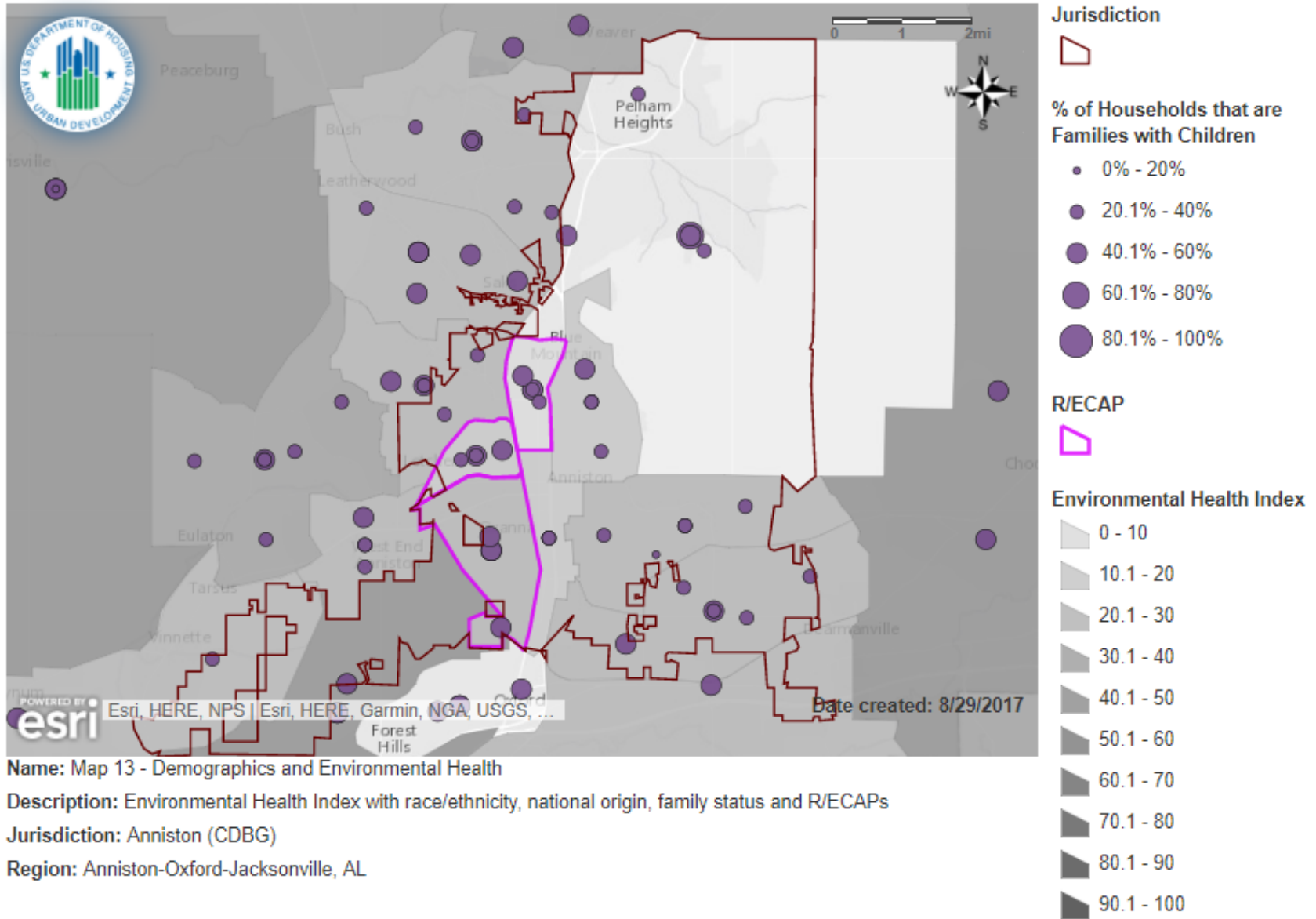90.1 - 100

Date created: 8/29/2017

Figure 31. Environmental Health Index and Households with Children in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 13 - Demographics and Environmental Health
Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

f. **Patterns in Disparities in Access to Opportunity**

   i. **Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.**

The largest disparities by race in access to areas of opportunity are related to labor market participation and poverty. African American residents of Anniston are approximately three times as likely to live in neighborhoods with low levels of labor market participation and high levels of poverty than are Asian residents, whose access to these measures of opportunity are greatest. Disparities narrow between these groups when evaluating the HOME Consortium area or the Anniston region as a whole. Access to proficient schools and healthy air quality is uniformly low for all racial and ethnic groups living in Anniston, but outside the city, white residents generally lived in neighborhoods with access to better schools and air quality than other groups, particularly African American residents.

1. **Additional Information**

   a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

No additional local data is available for analysis.

   b. **The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The City of Anniston, Anniston Housing Authority, and Anniston City Schools collaborated on a master plan for west Anniston, completed in 2014. The plan engaged members of the public in visioning and planning through a charrette to achieve a coordinated and holistic strategy for lasting positive change in the area. The finished plan includes land use recommendations, development strategies, and socioeconomic revitalization strategies. The latter set of strategies are focused on education, economic development, public safety, and quality of life enhancements. This plan is an important tool and its successful implementation will strengthen access to key opportunities for residents of west Anniston. Additionally, Anniston Housing Authority and the City have partnered to pursue a Choice Neighborhoods Planning Grant from HUD. If funded, this project would bring vital resources to jump start the revitalization and reinvestment needed to bring new opportunity to the community.

2. **Contributing Factors of Disparities in Access to Opportunity**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

<u>Priority Contributing Factors</u>

- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Location of environmental health hazards
- Location and type of affordable housing

<u>Non-Priority Contributing Factors</u>

- Location of proficient schools and school assignment policies
- Private discrimination

iv. Disproportionate Housing Needs

1. Analysis

    a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity.

CHAS data for the city of Anniston, the Anniston HOME Consortium, and the Anniston-Oxford-Jacksonville region is provided in the tables below. In the city of Anniston, there are 3,255 households with one or more housing problems, constituting about one-third (33.89%) of all Anniston households. Nearly one-fifth of households citywide face a severe housing problem (1,730 households or 18.01%). Levels of need within the Anniston HOME Consortium and the Anniston-Oxford-Jacksonville region are similar but slightly lower. Just under 30% of households in both geographies have a housing need, and about 15% have a severe need. Within the HOME Consortium geography, there are 11,270 households with housing needs and 5,865 households with severe needs.

Looking at need by householder race and ethnicity in Anniston shows that about one-quarter of non-Latino white households have a housing problem and about one-in-eight have a severe housing problem. HUD defines a group as having a disproportionate need if its members face housing needs

at a rate that is ten percentage points or more above that of white households. Using this definition, there are two groups in the city with disproportionate needs:

- Non-Latino African American households – 42.13% have a housing problem and 24.02% have a severe housing problem; and
- Other non-Latino households – 63.77% have a housing problem and 43.48% have a severe housing problem.

Within the Anniston HOME Consortium, housing and severe housing need rates for white households are roughly equivalent to those in Anniston at 25.06% and 12.07%, respectively.   At this geography, three groups have disproportionate housing needs:

- Non-Latino African American households – 42.92% have a housing problem and 24.72% have a severe housing problem;
- Other non-Latino households – 53.47% have a housing problem and 37.29% have a severe housing problem; and
- Non-Latino Native American households – 31.34 have a severe housing problem.

Disproportionate levels of housing need are more pronounced at the regional level, where four of the five racial and ethnic groups examined have disproportionately greater rates of housing needs and severe housing needs (African Americans, Native Americans, other non-Latinos, and Latinos).

Table 6 also compares housing need rates for households by size and familial status. Small families (under 5 people) have the lowest rate of housing need in all the geographies, ranging from 23.47% in the region to 29.68% in Anniston. In the city, large families (5 or more people) are most likely to experience a housing need, with 45.37% of large families have one or more needs. In the Anniston HOME Consortium and the region, needs are most prevalent for non-family households, at 37.17% and 35.85%, respectively. In both geographies, about one-third of large families face a housing problem.

Table 7 examines only one dimension of housing need – severe cost burdens. Overall, 1,585 households in Anniston and 5,386 households in the Anniston HOME Consortium spend more than 50% of their income on housing (16.50% and 13.97% of total households, respectively). In Anniston, 11.53% of white households face a severe cost burden, and one population group faces a disproportionate rate of severe cost burden compared to whites (other non-Latino households, with a rate of 43.48% or 30 households). Non-Latino Black households also have an elevated rate of severe cost burdens (21.28%), although it falls just short of meeting HUD's definition of "disproportionate."

Disproportionate rates of severe cost burdens are more common in the Anniston HOME Consortium and region. Within the Consortium, three groups have a disproportionate rate of severe cost burden compared to whites (11.26%):

- Non-Latino African American households – 22.78% have a severe cost burden;
- Non-Latino Native American households – 28.36% have a severe cost burden; and
- Other non-Latino households – 29.04% have a severe cost burden.

Regionally, four of the five population groups examined have a disproportionate rate of severe cost burdens (African Americans, Native Americans, other non-Latinos, and Latinos).

Within Anniston, nearly one-quarter of large family households have a severe cost burden (23.15%, the highest of all household types) compared to 11.79% for small family households. Within the Consortium and regionally, non-family households have the highest rate of severe cost burdens at 19.47% and 18.99%, respectively, compared to 10.68% and 10.55%, respectively, for small families.

Overall, African American and other non-Latino households in Anniston typically experience housing problems, severe housing problems, and severe cost burdens at rates that are disproportionately higher than white households in the city. In the HOME Consortium, disproportionate needs and severe cost burdens are more common, impacting African Americans, Native Americans, and other non-Latino households. Regionally, Latino households also face disproportionate rates of housing need and severe cost burdens.

Housing needs and severe cost burdens affect large families most acutely in Anniston; in the HOME Consortium and region, non-family households have the highest rates of housing problems.

Table 7. Demographics of Households with Disproportionate Housing Needs									
Disproportionate Housing Needs	**City of Anniston**			**Anniston HOME Consortium**			**Anniston-Oxford-Jacksonville Region**		
Households Experiencing any of the Four Housing Problems	**# with problems**	**# of households**	**% with problems**	**# with problems**	**# of households**	**% with problems**	**# with problems**	**# of households**	**% with problems**
Race/Ethnicity									
White, Non-Hispanic	1,179	4,554	25.89%	7,208	28,767	25.06%	8,210	34,160	24.03%
Black, Non-Hispanic	1,980	4,700	42.13%	3,604	8,397	42.92%	3,955	9,225	42.87%
Hispanic	34	148	22.97%	205	724	28.31%	414	1,034	40.04%
Asian or Pacific Islander, Non-Hispanic	0	90	0.00%	10	165	6.06%	35	240	14.58%
Native American, Non-Hispanic	0	15	0.00%	42	134	31.34%	58	158	36.71%
Other, Non-Hispanic	44	69	63.77%	162	303	53.47%	174	388	44.85%
Total	3,255	9,605	33.89%	11,270	38,555	29.23%	12,830	45,200	28.38%
Household Type and Size									
Family households, <5 People	1,395	4,700	29.68%	5,303	22,261	23.82%	6,265	26,690	23.47%
Family households, 5+ People	245	540	45.37%	934	2,716	34.39%	1,120	3,308	33.86%
Non-family households	1,615	4,360	37.04%	5,045	13,572	37.17%	5,445	15,190	35.85%
Households Experiencing any of the Four Severe Housing Problems	**# with problems**	**# of households**	**% with problems**	**# with problems**	**# of households**	**% with problems**	**# with problems**	**# of households**	**% with problems**
Race/Ethnicity									
White, Non-Hispanic	540	4,554	11.86%	3,471	28,767	12.07%	3,940	34,160	11.53%
Black, Non-Hispanic	1,129	4,700	24.02%	2,076	8,397	24.72%	2,289	9,225	24.81%
Hispanic	30	148	20.27%	143	724	19.75%	289	1,034	27.95%
Asian or Pacific Islander, Non-Hispanic	0	90	0.00%	0	165	0.00%	25	240	10.42%
Native American, Non-Hispanic	0	15	0.00%	42	134	31.34%	58	158	36.71%
Other, Non-Hispanic	30	69	43.48%	113	303	37.29%	118	388	30.41%
Total	1,730	9,605	18.01%	5,865	38,555	15.21%	6,725	45,200	14.88%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

Table 8. Demographics of Households with Severe Housing Cost Burden									
	City of Anniston			**Anniston HOME Consortium**			**Anniston-Oxford-Jacksonville Region**		
Households with Severe Housing Cost Burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe Cost burden
Race/Ethnicity									
White, Non-Hispanic	525	4,554	11.53%	3,239	28,767	11.26%	3,645	34,160	10.67%
Black, Non-Hispanic	1,000	4,700	21.28%	1,913	8,397	22.78%	2,150	9,225	23.31%
Hispanic	30	148	20.27%	108	724	14.92%	215	1,034	20.79%
Asian or Pacific Islander, Non-Hispanic	0	90	0.00%	0	165	0.00%	25	240	10.42%
Native American, Non-Hispanic	0	15	0.00%	38	134	28.36%	50	158	31.65%
Other, Non-Hispanic	30	69	43.48%	88	303	29.04%	95	388	24.48%
Total	1,585	9,605	16.50%	5,386	38,555	13.97%	6,180	45,200	13.67%
Household Type and Size									
Family households, <5 People	554	4,700	11.79%	2,378	22,261	10.68%	2,815	26,690	10.55%
Family households, 5+ People	125	540	23.15%	383	2,716	14.10%	465	3,308	14.06%
Non-family households	909	4,360	20.85%	2,643	13,572	19.47%	2,885	15,190	18.99%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Figures 29 and 30 map the prevalence of housing problems in Anniston and the region by census tract. As shown, the area with the highest rate of housing need is an R/ECAP tract (tract 5) in West Anniston, where over 50% of households experience one or more of the four housing needs discussed above. With the exception of East Anniston and Golden Springs, the rate of housing need in other parts of the city ranges between about 32% and 42%. In East Anniston and Golden Springs, less than one-quarter of households have a housing problem.

In addition to being an R/ECAP, the tract with the greatest level of housing needs is relatively segregated and most residents are African American. One area with low housing need levels – the East Anniston area – is also segregated, although most residents there are white. Golden Springs, which also has a low level of housing need, is more diverse.

Regionally, one other census tract has a high rate of housing problems – tract 21.01 in northwest Jacksonville and adjacent unincorporated parts of Calhoun County. More than half of households there have a housing need (52.81%), and the tract is one of the more diverse areas of the county, with a population that is about 60% white and 36% African American.

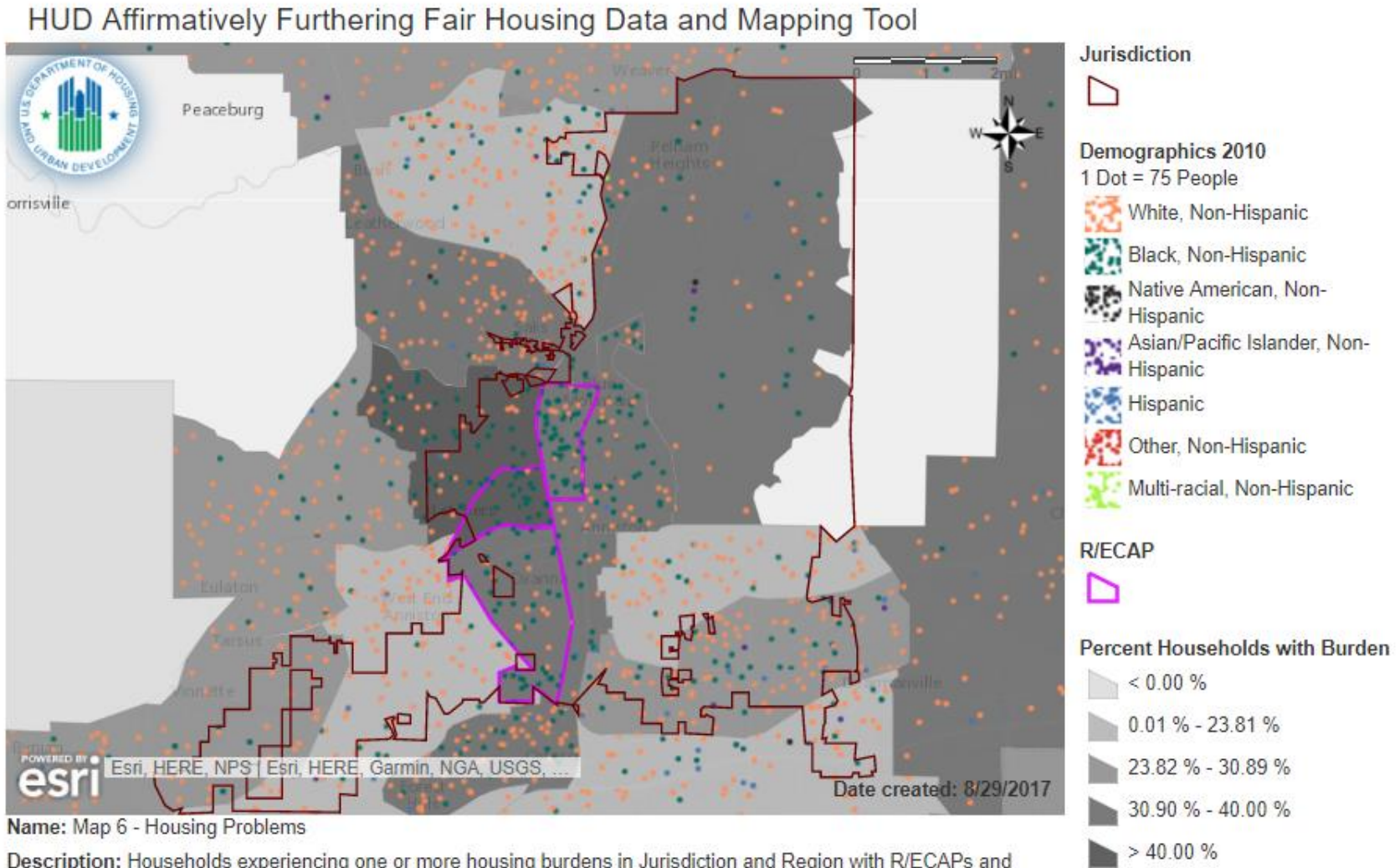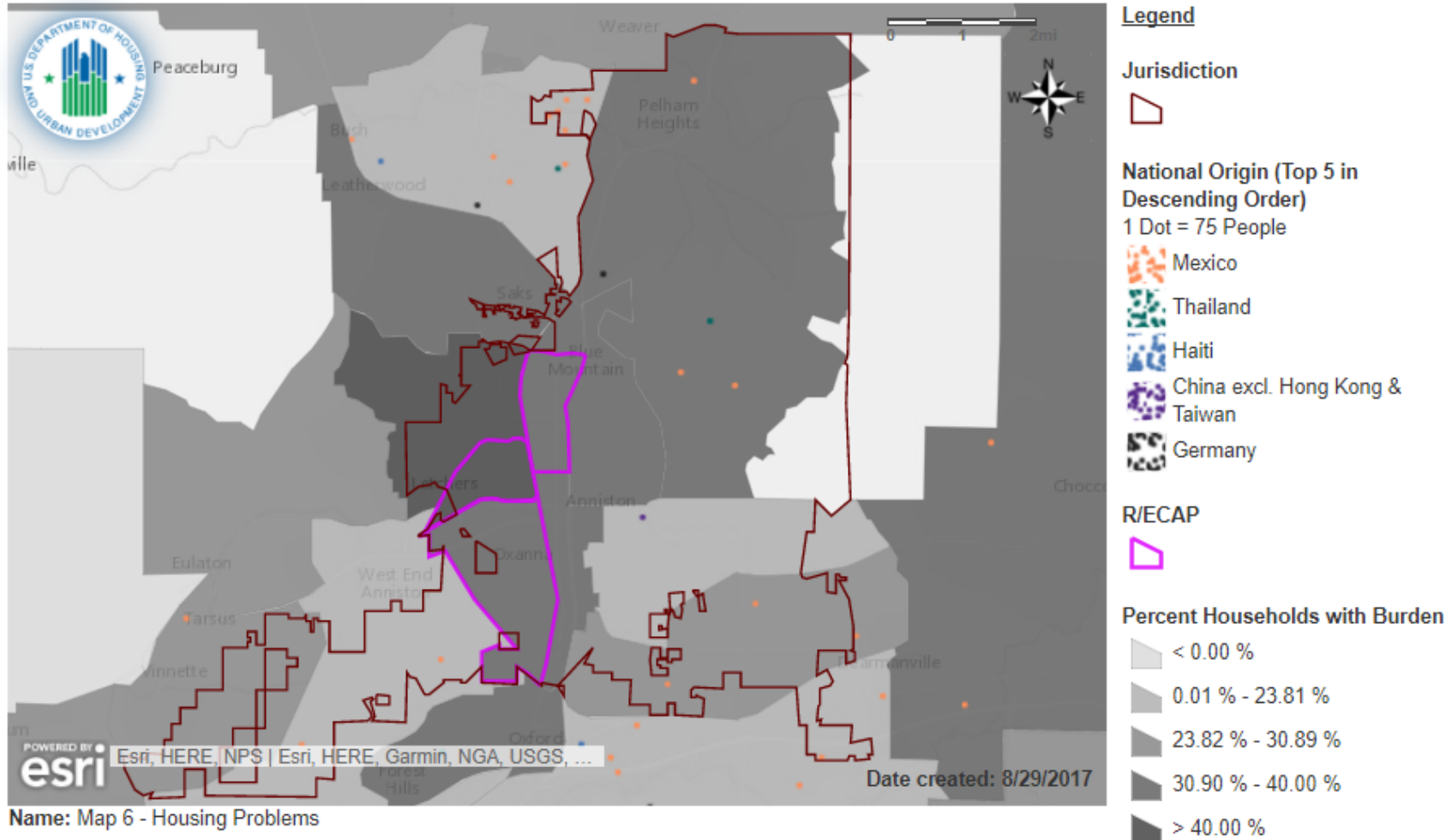**Figure 32. Housing Burden and Race/Ethnicity in the City of Anniston**

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 6 - Housing Problems
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

Figure 33. Housing Burdens and National Origin in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

National Origin (Top 5 in Descending Order)
1 Dot = 75 People
- Mexico
- Thailand
- Haiti
- China excl. Hong Kong & Taiwan
- Germany

R/ECAP

Percent Households with Burden
- < 0.00 %
- 0.01 % - 23.81 %
- 23.82 % - 30.89 %
- 30.90 % - 40.00 %
- > 40.00 %

Date created: 8/29/2017

Name: Map 6 - Housing Problems
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density
Jurisdiction: Anniston (CDBG)
Region: Anniston-Oxford-Jacksonville, AL

c. **Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.**

Table 8 provides information for households living in publicly supported housing, including unit size (i.e., number of bedrooms) and presence of children, by housing type. Assuming that households with children would need a two-bedroom unit or larger, comparing the number of two- and three-or-more-bedroom units with the number of households with children indicates potential issues related to overcrowding. In Anniston, there is a sufficient number of two bedroom or larger units to house all households with children in each program category except project-based Section 8 units. In that case, there are 21 households with children but only 19 appropriately-sized units. In the HOME Consortium, no program category indicates a mismatch between households with children and existing housing stock.

Because data about households with children by household size is not available, more precise conclusions regarding the suitability of the existing housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernable without information about household size. Further, from Table 6, there are 934 large family households in the Anniston HOME Consortium with a housing problem, compared to 562 subsidized units with three or more bedrooms, indicating continued need for housing assistance for large families.

Table 9. Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children								
Housing Type	**Households in 0-1 Bedroom Units**		**Households in 2 Bedroom Units**		**Households in 3+ Unit Bedrooms**		**Households with Children**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
City of Anniston								
Public Housing	116	18.15%	279	43.66%	241	37.72%	353	55.24%
Project-Based Section 8	196	89.91%	6	2.75%	13	5.96%	21	9.63%
Other Family	51	100.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	9	7.32%	54	43.90%	46	37.40%	62	50.41%
Anniston HOME Consortium								
Public Housing	236	21.87%	419	38.83%	415	38.46%	564	52.27%
Project-Based Section 8	279	81.82%	27	7.92%	27	7.92%	38	11.14%
Other Family	51	100.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	54	15.74%	152	44.31%	120	34.99%	176	51.31%

Data Source: APSH

d. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and region.

Table 9 provides the racial and ethnic distribution of homeowners and renters in Anniston, the Anniston HOME Consortium, and the Anniston-Oxford-Jacksonville region. In the city, the majority of owner households are white (58.47%), 38.35% are African American, and 1.59% are Hispanic. For renters, the majority are African American (62.44%), one-third are white (33.69%), and 1.53% are Hispanic.

In the HOME Consortium and region, white households make up larger shares of both owners and renters. About four-fifth of owner households are white, 14-15% are African American, and 1-2% are Latino. For renters, about three-fifths of households are white, one-third are African American, and 3% are Latino.

The data in Table 9 can also be used to calculate homeownership rates by race and ethnicity, which shows that households of color are significantly less likely to be homeowners than whites. In Anniston, 68.53% of white households own their homes, compared to 43.52% of African Americans and 56.67% of Latinos. In the HOME Consortium and region, 75% of white households own their homes, well above the homeownership rates for African Americans and Latinos (46-50%).

Table 10. Homeownership and Rental Rates by Race/Ethnicity												
Race/Ethnicity	City of Anniston				Anniston HOME Consortium				Anniston-Oxford-Jacksonville Region			
	Owners		Renters		Owners		Renters		Owners		Renters	
	#	%	#	%	#	%	#	%	#	%	#	%
Non-Hispanic												
White	3,125	58.47%	1,435	33.69%	21,645	82.22%	7,144	58.41%	25,775	83.06%	8,395	59.24%
Black	2,050	38.35%	2,660	62.44%	3,955	15.02%	4,465	36.51%	4,275	13.78%	4,940	34.86%
Asian	25	0.47%	70	1.64%	70	0.27%	100	0.82%	85	0.27%	165	1.16%
Native American	15	0.28%	0	0.00%	92	0.35%	42	0.34%	105	0.34%	50	0.35%
Other	45	0.84%	25	0.59%	204	0.77%	105	0.86%	280	0.90%	105	0.74%
Hispanic	85	1.59%	65	1.53%	355	1.35%	365	2.98%	515	1.66%	515	3.63%
Total	5,345	-	4,260	-	26,325	-	12,230	-	31,030	-	14,170	-

Note: Data presented are number of households, not individuals.

Source: APSH

2. **Additional Information**

   a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

Housing needs for persons with disabilities will be discussed in the Disability and Access Analysis.

   b. **The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

In addition to the housing needs identified by HUD, stakeholders interviewed for this report indicated substandard, dilapidated, or abandoned housing as a significant concern in West Anniston. These concerns extended to landlords with properties with code enforcement issues and to senior or low-income homeowners with difficulty maintaining their homes. Additionally, in the community survey, 66% of respondents noted that "neighborhoods that need revitalization and new investment" are a barrier to fair housing in Anniston, with many specifically mentioning West Anniston homes as being in disrepair. Stakeholder input also mentioned difficulties obtaining home loans for West Anniston properties, which in turn have impacted property values in the area as owners sell to cash buyers at lower prices.

Stakeholders emphasized the need for housing resources for homeless persons, including supportive housing for persons with mental disabilities. According to the Homeless Coalition of Northeast Alabama's 2015 point in time homeless county, there were 156 homeless people counted in the Etowah and Calhoun Counties, including 103 who were sheltered and 53 who were unsheltered, down from 438 people counted in 2014.

3. **Contributing Factors of Disproportionate Housing Needs**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

Priority Contributing Factors

- Availability of affordable units in a range of sizes
- Deteriorated and abandoned properties
- Lack of private investment in specific neighborhoods
- Location of environmental health hazards

Non-Priority Contributing Factors

- Lack of regional cooperation
- Impediments to mobility
- Lack of affordable housing for individuals who need supportive services

C. Publicly Supported Housing Analysis

1. **Analysis**

   a. **Publicly Supported Housing Demographics**

      i. **Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?**

Public housing in Anniston is operated by the Anniston Housing Authority (AHA) and not by the City. Though AHA has been consulted in the course of this Assessment of Fair Housing, the Authority will prepare and submit its own AFH, which may include additional detail on publicly supported housing in the city. The geography covered by Anniston's HOME Consortium includes three additional public housing authorities (the Housing Authority of the Town of Hobson City, Jacksonville Housing Authority, and Piedmont Housing Authority) that are included in the analysis presented in this section. As with AHA, the City of Anniston is independent of these organizations.

Public housing units and HCV program units are overwhelmingly occupied by African American households, both within Anniston and in the Consortium, according to the data in Table 11. White households, while significantly underrepresented in the city's public housing and HCV units, are far more likely to live in Project-Based Section 8 or other subsidized multifamily units. The total numbers of Hispanic and Asian residents in any type of publicly supported housing were too low to be meaningfully connected to trends in the occupancy of housing units by type.

Table 11. Publicly Supported Housing Units by Program Category		
Housing Units	**#**	**%**
	City of Anniston	
Total housing units	15,515	-
Public housing	746	4.81%
Project-based Section 8	218	1.41%
Other multifamily	49	0.32%
HCV program	212	1.37%
	Anniston HOME Consortium	
Total housing units	47,569	-
Public housing	1,191	2.50%
Project-based Section 8	340	0.71%
Other multifamily	49	0.10%
HCV program	552	1.16%

Source: Decennial Census; APSH

Table 12. Publicly Supported Housing Residents by Race/Ethnicity								
Housing Type	**Race/Ethnicity**							
	White		**Black**		**Hispanic**		**Asian or Pacific Islander**	
	#	%	#	%	#	%	#	%
City of Anniston								
Public Housing	38	5.97%	591	92.78%	5	0.78%	3	0.47%
Project-Based Section 8	145	67.44%	70	32.56%	0	0.00%	0	0.00%
Other Family	39	78.00%	9	18.00%	0	0.00%	1	2.00%
HCV Program	5	4.39%	109	95.61%	0	0.00%	0	0.00%
0-30% AMI	510	28.49%	1,200	67.04%	20	1.12%	45	2.51%
0-50% AMI	915	29.23%	2,005	64.06%	40	1.28%	45	1.44%
0-80% AMI	1,575	34.58%	2,750	60.37%	48	1.05%	45	0.99%
Total Households	4,554	47.41%	4,700	48.93%	148	1.54%	90	0.94%
Anniston HOME Consortium								
Public Housing	306	28.49%	755	70.30%	8	0.74%	4	0.37%
Project-Based Section 8	237	70.75%	97	28.96%	1	0.30%	0	0.00%
Other Family	39	78.00%	9	18.00%	0	0.00%	1	2.00%
HCV Program	61	18.32%	268	80.48%	3	0.90%	1	0.30%
0-30% AMI	3,176	56.84%	2,146	38.40%	94	1.68%	45	0.81%
0-50% AMI	5,291	52.58%	3,482	34.60%	133	1.32%	45	0.45%
0-80% AMI	9,236	59.78%	4,677	30.27%	304	1.97%	65	0.42%
Total Households	28,767	74.61%	8,397	21.78%	724	1.88%	165	0.43%
Anniston-Oxford-Jacksonville Region								
Public Housing	306	28.49%	755	70.30%	8	0.74%	4	0.37%
Project-Based Section 8	237	70.75%	97	28.96%	1	0.30%	0	0.00%
Other Family	39	78.00%	9	18.00%	0	0.00%	1	2.00%
HCV Program	62	18.34%	272	80.47%	3	0.89%	1	0.30%
0-30% AMI	3,520	57.05%	2,360	38.25%	125	2.03%	55	0.89%
0-50% AMI	5,880	53.07%	3,770	34.03%	230	2.08%	55	0.50%
0-80% AMI	10,540	60.52%	4,990	28.65%	520	2.99%	110	0.63%
Total Households	34,160	75.58%	9,225	20.41%	1,034	2.29%	240	0.53%

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; APSH

Table 13. Publicly Supported Housing Residents by Race/Ethnicity								
	Total # of Occupied Units	% Elderly	% with a disability	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with Children
City of Anniston								
Public Housing								
R/ECAP tracts	636	7.67%	9.23%	5.97%	92.78%	0.78%	0.47%	55.24%
Non R/ECAP tracts	NA	NA	NA	NA	NA	NA	NA	NA
Project-Based Section 8								
R/ECAP tracts	95	89.90%	16.16%	82.65%	17.35%	0.00%	0.00%	0.00%
Non R/ECAP tracts	114	54.62%	25.21%	54.70%	45.30%	0.00%	0.00%	17.65%
Other HUD Multifamily Housing								
R/ECAP tracts	NA	NA	NA	NA	NA	NA	NA	NA
Non R/ECAP tracts	49	100.00%	1.96%	78.00%	18.00%	0.00%	2.00%	0.00%
HCV Program								
R/ECAP tracts	17	11.11%	27.78%	0.00%	100.00%	0.00%	0.00%	22.22%
Non R/ECAP tracts	105	16.35%	15.38%	5.15%	94.85%	0.00%	0.00%	55.77%
Anniston HOME Consortium								
Public Housing								
R/ECAP tracts	636	7.67%	9.23%	5.97%	92.78%	0.78%	0.47%	55.24%
Non R/ECAP tracts	NA	NA	NA	NA	NA	NA	NA	NA
Project-Based Section 8								
R/ECAP tracts	95	89.90%	16.16%	82.65%	17.35%	0.00%	0.00%	0.00%
Non R/ECAP tracts	114	54.62%	25.21%	54.70%	45.30%	0.00%	0.00%	17.65%
Other HUD Multifamily Housing								
R/ECAP tracts	NA	NA	NA	NA	NA	NA	NA	NA
Non R/ECAP tracts	49	100.00%	1.96%	78.00%	18.00%	0.00%	2.00%	0.00%
HCV Program								
R/ECAP tracts	17	11.11%	27.78%	0.00%	100.00%	0.00%	0.00%	22.22%
Non R/ECAP tracts	105	16.35%	15.38%	5.15%	94.85%	0.00%	0.00%	55.77%

Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Source: APSH

Table 14. Demographics of Publicly Supported Housing Developments by Program Category						
	Anniston HOME Consortium					
Development Name	# Units	% White	% Black	% Hispanic	% Asian	% House-holds with Children
Public Housing						
Constantine Homes (Anniston HA)	254	6%	93%	1%	NA	56%
Glenaddie Homes (Anniston HA)	264	6%	93%	1%	1%	51%
Cooper Homes (Anniston HA)	228	7%	92%	1%	1%	63%
Craig Homes (Piedmont HA)	210	74%	25%	1%	NA	50%
Roebuck Manor (Jacksonville HA)	175	66%	32%	1%	1%	43%
Snow Plaza (HA of Town of Hobson City)	60	2%	98%	0%	NA	58%
Project-Based Section 8 Housing						
Cedars Green (Anniston)	50	43%	57%	0%	NA	40%
Wesley Apartments (Anniston)	68	65%	35%	0%	NA	NA
Westminster (Anniston)	100	82%	18%	0%	NA	NA
Hobson City Apartments (Hobson City)	24	9%	91%	0%	NA	61%
Other HUD Multifamily Assisted Housing						
Casey Estates (Anniston)	49	78%	18%	0%	2%	NA

Note: For LIHTC properties, this information will be supplied by local knowledge. Percentages may not add to 100 due to rounding error.

Data Sources: APSH

> **ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

Based on the demographic data presented earlier in this Assessment, Anniston's non-Latino Black population is 48.15% and the non-Latino white population is 45.95%; people identifying as Hispanic or Latino of any race were 3.21%. Comparing these population shares, African American residents are overrepresented in all types of publicly supported housing. While making up just over half of the city's population, African American residents make up almost 97% of the public housing residents and 95% of Housing Choice Voucher holders. White residents (37.1% of the city's population) made up just 3% of public housing and voucher households. Hispanic and Asian households are also underrepresented in all types of public housing. Households living in Project-Based Section 8 units were distributed most closely to the city's overall racial and ethnic composition.

People of color in Anniston are disproportionately affected by poverty, which could partially explain the especially high numbers of African American households living in publicly supported housing. For non-Latino whites, the poverty rate was 16.7%, approximately half the rate of African Americans (31.4%). However, the share of white households living in public housing or participating in voucher programs is less than 4% that of Black households, a far greater gap than the 53% difference in these groups' poverty status. Further complicating the income explanation is the fact that Asians and Hispanics all experienced high rates of poverty relative to whites (28.1% and 37.8%, respectively) but are also underrepresented in publicly supported housing units.

b. **Publicly Supported Housing Location and Occupancy**

Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

Of the five main types of publicly supported housing, only public housing units are located in R/ECAPs, including most of AHA's public housing developments. Public housing owned by the Hobson City, Jacksonville, and Piedmont housing authorities is not located in R/ECAPs, as the only three tracts in the study area with such a designation are all within Anniston. Virtually no Housing Choice Vouchers are used in these tracts and are instead clustered in the Joyview Heights, Randolph Park, and McClellan neighborhoods within Anniston and in Jacksonville. These tracts are relatively diverse in terms of race and ethnicity, with the non-white share of the population in most between 24% and 35% (the non-white population share in the tract containing Joyview Heights and Randolph Park is 94.34%, making it an outlier). Low-Income Housing Tax Credit units are generally found in these same areas while Project-Based Section 8 units are primarily located in downtown Anniston between Noble Street and Quintard Avenue and outside Anniston in Hobson City and Oxford.

Figure 34. Publicly Supported Housing and Race/Ethnicity in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color

Jurisdiction: Anniston (CDBG)

Region: Anniston-Oxford-Jacksonville, AL
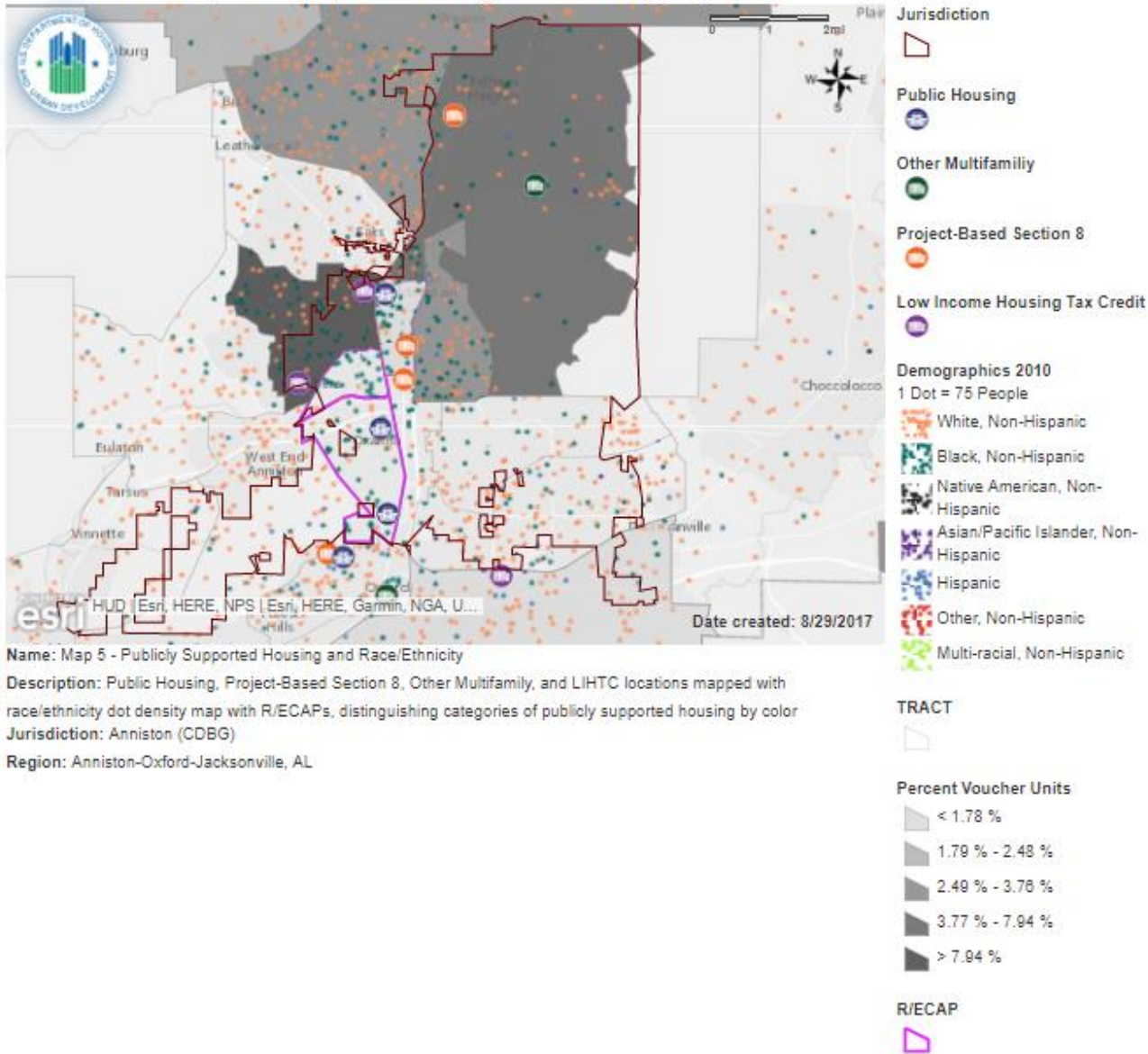
i. **Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?**

According to the HUD-provided data in Table 12, Project-Based Section 8 is the only publicly supported housing type comprised of a significant number of units both inside and outside R/ECAPs. For this unit type, elderly residents are more likely to reside in units in R/ECAPs than units outside these areas. Families with children and people with disabilities more often live in units outside R/ECAPs than inside them. Although the data reports only 17 HCVs placed inside R/ECAP tracts, the share of these units occupied by people with disabilities is greater than the share for non-R/ECAP units. As with Project-Based Section 8, families with children are more likely to use their vouchers for housing outside R/ECAPs than inside them.

ii. **How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?**

Beginning again with Project-Based Section 8, when these units are located inside R/ECAP tracts, they are far more likely to house white residents (82.65%) compared to Black residents (17.35%). Units outside R/ECAPs have a more even split in resident demographics with 54.7% of the residents being white and 45.3% being African American. All 17 of the Housing Choice Vouchers used in R/ECAP tracts are used by African American households, however, this figure may be merely representative of the fact that over 95% of HCVs are held by African American residents. Vouchers placed in areas outside R/ECAPs are 94.85% held by African American households and 5.15% held by white households.

iii. **(A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.**

All of Anniston Housing Authority's public housing developments are predominantly occupied by African American residents (93% in Constantine and Glen Addie; 92% in Cooper). The Project-Based Section 8 and other assisted multifamily housing held by AHA have much larger shares of white residents. While African American residents make up at least 92% of the housing units at AHA's public housing developments, this group makes up only 18% of the residents at Westminster (Project-Based Section 8) and Casey Estates (Other Assisted Multifamily). The resident demographics of AHA's Cedars Green development are somewhat more balanced, with 57% of the residents being African American and 43% white. Hispanic and Asian residents generally comprised 1% or less of the residents in any given property. Families with children are distributed relatively evenly across family properties of all types, ranging from 40% of the occupants at Cedars Green to 63% at Cooper Homes.

The other public housing authorities represented in the Consortium's geography exhibit a wide degree of racial difference. Hobson City's Snow Plaza is 98% African American and its Hobson City Apartments are 91% African American. Jacksonville and Piedmont both illustrate smaller degrees of difference. Residents of Piedmont's Craig Homes are 25% African American and 74% white; Jacksonville's Roebuck Manor is 32% African American and 66% white.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

No additional relevant information is locally available.

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

The demographics of the residents of subsidized housing developments are somewhat consistent with those of the immediate surrounding community, however, there are some marked exceptions. The three AHA public housing properties included in HUD's data are occupied by 92% to 93% African American residents while the tracts in which they are located have Black populations comprising between 64% and 87% of the total tract population. These examples track the basic demographics of their communities, but the public housing properties have higher percentages of Black residents than the surrounding communities.

In other cases, the demographics of publicly supported housing developments are not representative of the surrounding community. The tract in Hobson City where both Snow Plaza (98% African American) and Hobson City Apartments (91% African American) are located is only 27% African American. AHA's Westminster development is 82% white, but located in a neighborhood that is 88% African American.

c. **Disparities in Access to Opportunity**

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

Most of Anniston's highest-poverty neighborhoods are located in central, west, and south Anniston. These areas, which all have low poverty index scores under 10 (10 points out of 100) include many public housing developments owned by the Anniston Housing Authority (Norwood, Cooper, Washington, Glen Addie, Constantine). In west Anniston in particular, diminished access to opportunity has significant impacts on public housing residents. More than 90% of the residents of public housing developments in west Anniston are African American. These same areas have extremely low levels of labor market participation with opportunity scores under 10. By contrast, LIHTC, HCV, Project-Based Section 8, and other subsidized multifamily units tend to be located in areas of Anniston or of the Consortium area with better access to opportunity.

2. **Additional Information**

a. **Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

Though the Anniston Fair Housing Survey did not directly ask respondents for their general opinions about rental housing or publicly subsidized housing, many survey-takers entered additional comments in optional comment fields often indicating strong negative feelings toward these housing types. These "not in my backyard" (NIMBY) attitudes are likely to pose a challenge to public or private entities that attempt to expand decent affordable rental housing stock in the city. A selection of survey responses appears below as examples of this attitude.

- I do not want Section 8 housing in my neighborhood!
- Several "good" neighborhoods in Anniston have been ruined with section 8 housing. Property value has dropped and crime has increased in these areas.
- We need less rental properties in higher income areas.
- We need less RENTAL properties bringing down our house values in our nice neighborhoods.
- The last thing we need is more section 8 and more "slum lords" we have plenty of each.
- I am against public housing and Section 8. Everyone needs to stand on their own two feet and pay for their own housing.
- There are too many section 8 and housing projects in Anniston which is a major reason for a lot of problems.
- Section 8 vouchers lower owner property values! There is no stipulation that renters maintain the property.
- Why does everything have to be section 8? Everyone can't be approved for section 8 most of them lie on the application.

b. **The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.**

The City of Anniston, Anniston Housing Authority, and Anniston City Schools collaborated on a master plan for west Anniston, completed in 2014. The plan engaged members of the public in visioning and planning through a charrette to achieve a coordinated and holistic strategy for lasting positive change in the area. The finished plan includes land use recommendations, development strategies, and socioeconomic revitalization strategies. The latter set of strategies are focused on education, economic development, public safety, and quality of life enhancements. This plan is an important tool and its successful implementation will strengthen access to key opportunities for residents of west Anniston. Additionally, Anniston Housing Authority and the City have partnered to pursue a Choice Neighborhoods Planning Grant from HUD. If funded, this project would bring vital resources to jump start the revitalization and reinvestment needed to bring new opportunity to the community.

3. **Contributing Factors of Publicly Supported Housing Location and Occupancy**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity

of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Priority Contributing Factors

- Impediments to mobility
- Lack of public investment in specific neighborhoods, including services and amenities
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Non-Priority Contributing Factors

- Community opposition
- Lack of private investment in specific neighborhoods

D. Disability and Access Analysis

1. Population Profile

    a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

 In the city of Anniston, an estimated 5,134 persons over the age of 5 have a disability (Table 15), representing 24.76% of the total population. People aged 18 to 64 have the highest disability rate at 13.92% and the rate for seniors (persons age 65 and older) is 9.67%. In contrast, barely one in 100 children between the ages of 5 and 17 are disabled.

Within the region, 20% of the population over age 5 has a disability. For the population 18 and over, disability rates are slightly lower in the Consortium area and the Anniston region compared to the city. This may reflect that people with disabilities live in Anniston because it has better access to transit and other services than surrounding communities.

Ambulatory disabilities are the most common type in Anniston, affecting 15.58% of the population, followed by cognitive and independent living difficulties, which impact 10.45% and 9.79%, respectively. While generally lower, these proportions are roughly mirrored for the Consortium and region. The maps that follow show the geographic distribution of persons with disabilities throughout Anniston. These maps reveal that, while persons with disabilities live throughout the region, they are more likely to live in Anniston and other urban areas such as Jacksonville and along the I-20 corridor than in outlying areas. Within Anniston, the densest cluster of people with disabilities is found in the neighborhoods east of Quintard Avenue and north of 10th Street. Probably not coincidentally, this area also contains Stringfellow Memorial Hospital and is adjacent to Northeast Alabama Regional Medical Center on the south side of 10th Street. Rates of disability are somewhat concentrated in Anniston's R/ECAPs as well, but to a lesser degree than in the neighborhoods surrounding the region's hospitals.

    b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

The maps below show the geographic distribution of persons with disabilities by age and type. Geographic patterns for individual age groups appear to largely follow the patterns described above for the disabled population in general. One minor exception is that children aged 5 to 17 who are disabled are more likely to reside in the R/ECAP tract located between 15th Street and Blue Mountain Road, west of Quintard Avenue and also along the Old Gadsden Highway corridor outside Anniston than in the neighborhoods surrounding the city's hospitals. In a disability-specific analysis, nearly all types of disability followed the same geographic patterns as above except that an additional cluster of people with vision difficulties is located in the West End-Cobb Town community outside Anniston to the west.

Table 15. Disability by Type						
Disability Type	**City of Anniston**		**Anniston HOME Consortium**		**Anniston-Oxford-Jacksonville Region**	
	#	**%**	**#**	**%**	**#**	**%**
Hearing difficulty	1,139	5.49%	4,581	4.97%	5,379	4.92%
Vision difficulty	1,102	5.31%	3,788	4.11%	4,379	4.01%
Cognitive difficulty	2,167	10.45%	7,778	8.43%	9,053	8.29%
Ambulatory difficulty	3,231	15.58%	11,463	12.42%	13,322	12.19%
Self-care difficulty	1,332	6.42%	4,276	4.63%	4,873	4.46%
Independent living difficulty	2,031	9.79%	7,375	7.99%	8,786	8.04%

Note: All % represent a share of the total population within the jurisdiction or region.
Source: ACS

Table 16. Disability by Age Group						
Age of People with Disabilities	**City of Anniston**		**Anniston HOME Consortium**		**Anniston-Oxford-Jacksonville Region**	
	#	**%**	**#**	**%**	**#**	**%**
Age 5-17 with disabilities	243	1.17%	1,185	1.28%	1,311	1.20%
Age 18-64 with disabilities	2,886	13.92%	10,905	11.82%	12,642	11.57%
Age 65+ with disabilities	2,005	9.67%	6,647	7.20%	7,937	7.27%

Note: All % represent a share of the total population within the jurisdiction or region.
Source: ACS

Figure 35. Persons with a Hearing, Vision, or Cognitive Disability in the City of Anniston

Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Anniston (CDBG)
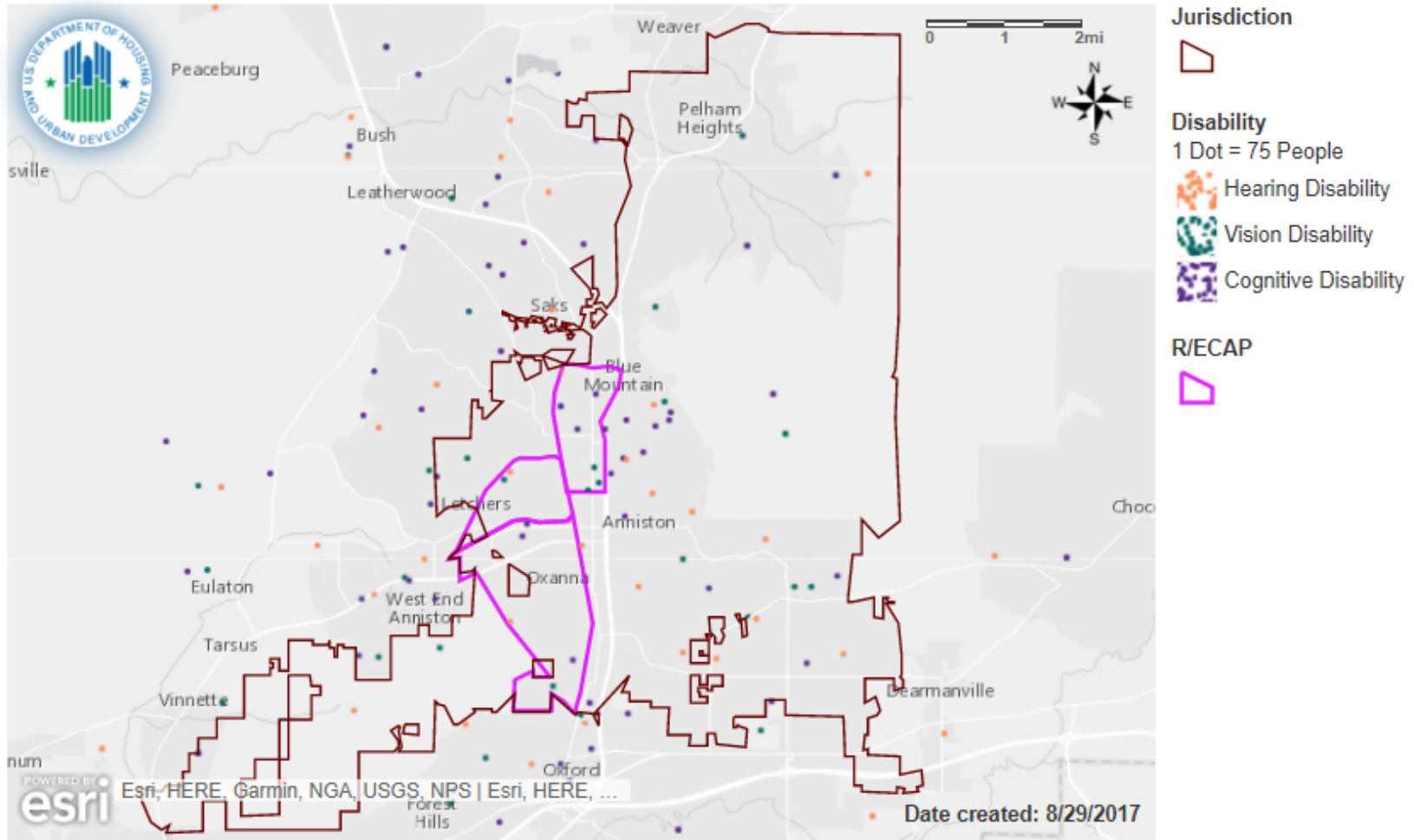
Region: Anniston-Oxford-Jacksonville, AL

Figure 36. Persons with an Ambulatory, Self-Care, or Independent Living Disability in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Anniston (CDBG)
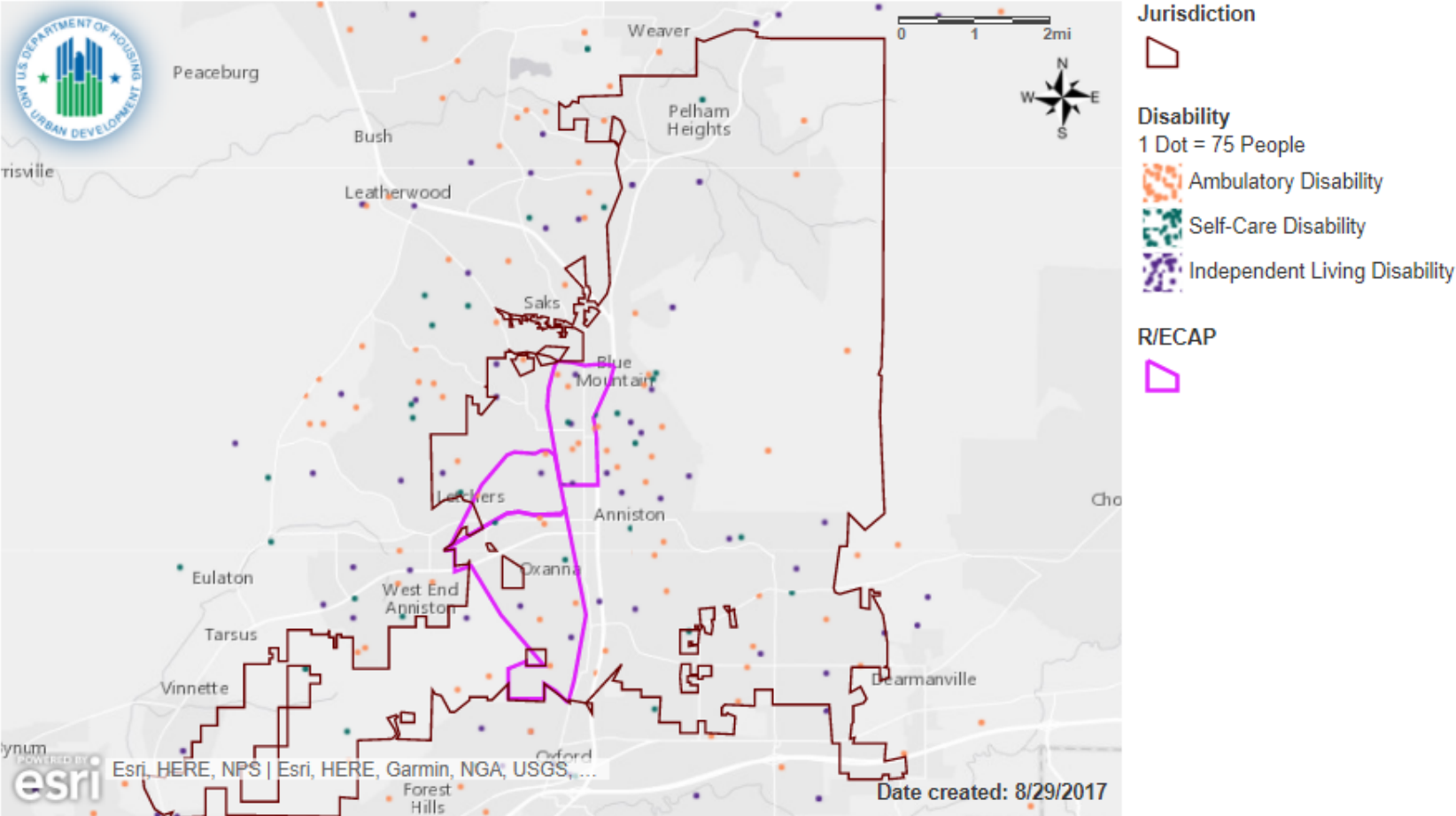
Region: Anniston-Oxford-Jacksonville, AL

Figure 37. Persons with a Disability by Age in the City of Anniston

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Jurisdiction

Disability
1 Dot = 75 People
- Disabled Ages 5-17
- Disabled Ages 18-64
- Disabled Over 64

R/ECAP

Date created: 8/29/2017
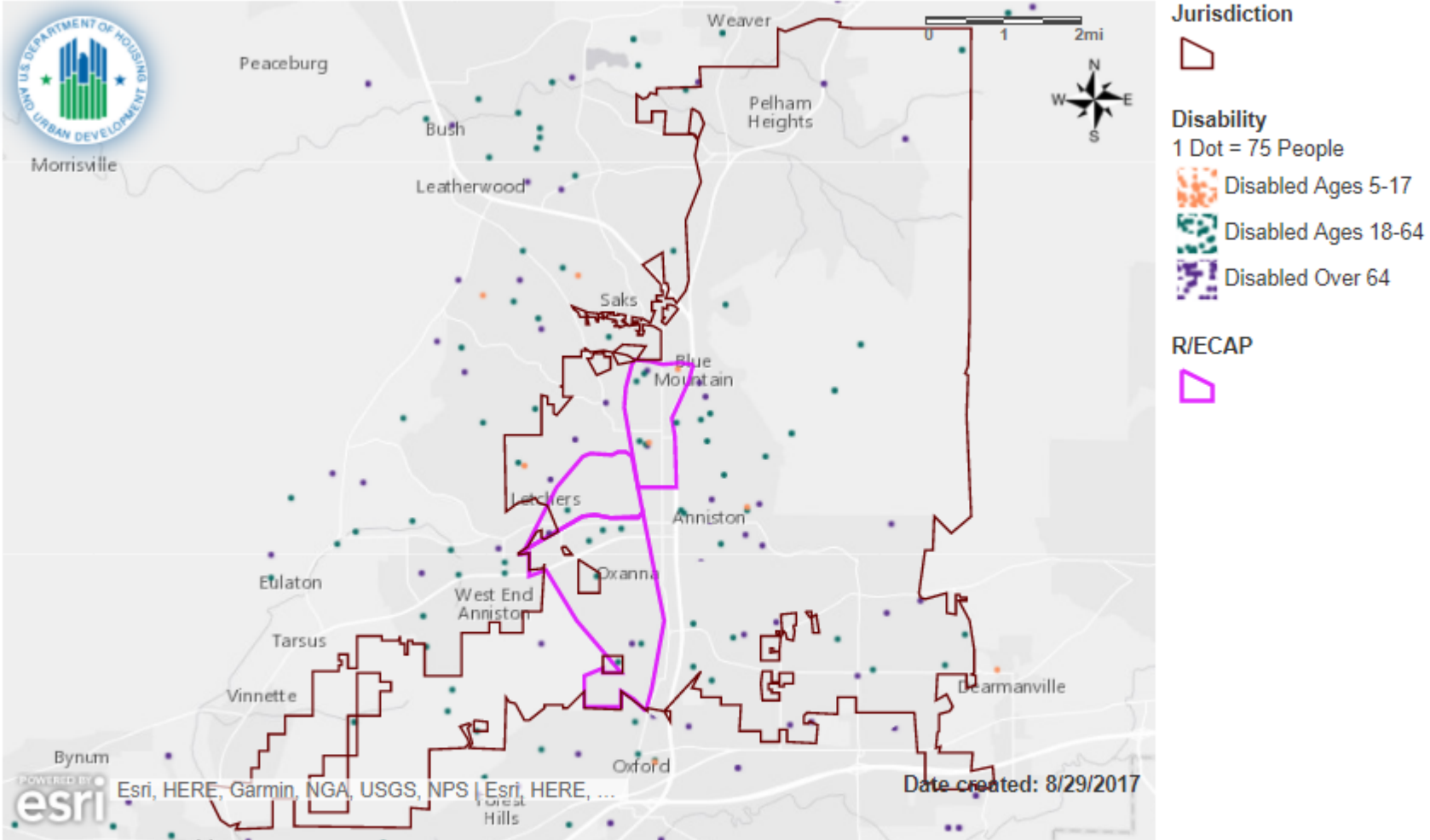
Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Anniston (CDBG)

Region: Anniston-Oxford-Jacksonville, AL

2. **Housing Accessibility**

   a. **Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.**

Stakeholder input indicates that affordable, accessible housing in a range of unit sizes is a moderate need in Anniston and the region. Analysis of responses to the public survey conducted for this Assessment found the need for housing for people with disabilities ranked as the third-most important type of housing needed, behind first-time homebuyer assistance and housing for seniors (which may also include an accessibility component). Several barriers to housing accessibility were identified, in interviews, public meetings and in survey comments, including:

- Housing for people with disabilities is expensive to produce and so requires high rents or public subsidies.
- The Anniston Housing Authority provides housing to this population but the private sector doesn't.
- A central clearinghouse for accessible apartments in Anniston would be helpful.
- There is not enough housing for this population. There are properties for the elderly, but not enough handicapped accessible units.
- Some older properties would almost have to be rebuilt to accommodate people with disabilities – and no one is building anything new in Anniston.
- The community is aging and needs more senior living arrangements, specifically assisted living with meal service and exercise accommodations.

   b. **Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?**

A search using HUD's Affordable Apartment Search Tool was conducted to identify affordable rental properties in Calhoun County designed to serve people with disabilities, however, the search returned no results. A similar point-in-time search on socialserve.com for affordable apartments with accessibility features currently for rent in the Anniston area returned only one result, a 3-bedroom unit at Cane Creek Apartments advertised at $630 per month. The Cane Creek Apartments are subsidized by low income housing tax credits and are located in a relatively diverse community near Fort McClellan and are not within an R/ECAP.

   c. **To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?**

As Table 16 shows, persons with disabilities are able to access various types of publicly supported housing. Whether in Anniston, the Consortium, or the region, Project-based Section 8 units have a larger share of households with a disabled member than any other types of subsidized housing, followed by Housing Choice Voucher program units. People with disabilities represent approximately a quarter of the white of Anniston's population yet only 9.23% of the city's households residing in public housing contain one or more people with a disability. Even in Project-Based Section 8 units, which are most likely to house people with disabilities, the proportion of disabled occupants is less than that of the city's overall population. Stakeholder input has suggested that accessible housing units are primarily created using public subsidies and that the private market seldom

delivers such units. Given this understanding, the underrepresentation of people with disabilities in publicly subsidized housing indicates that many members of this population are residing in housing that may not safely accommodate their disabilities.

	People with a Disability					
Housing Type	**City of Anniston**		**Anniston HOME Consortium**		**Anniston-Oxford-Jacksonville Region**	
	#	**%**	**#**	**%**	**#**	**%**
Public Housing	59	9.23%	144	13.35%	144	13.35%
Project-Based Section 8	46	21.10%	95	27.86%	95	27.86%
Other Multifamily Housing	1	1.96%	1	1.96%	1	1.96%
HCV Program	21	17.07%	72	20.99%	73	20.92%

Table 17. Disability by Publicly Supported Housing Program Category

Note: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.
Source: ACS

3. **Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

   a. **To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?**

The American Community Survey does not provide data regarding the number of persons with disabilities who reside in institutional settings, and no count is available locally.

   b. **Describe the range of options for persons with disabilities to access affordable housing and supportive services.**

The Right Place is an Anniston nonprofit organization funded in part with CDBG resources from the City whose mission is "to address the issues related to homelessness and low income housing in Calhoun County and surrounding areas."[6] The organization provides a small community of permanent supportive housing units available to households that are homeless or facing homelessness and that contain a person who is disabled. Anniston does not have any organizations that maintain a centralized directory of accessible housing or whose primary mission is to connect people with disabilities with affordable housing and supportive services.

---

[6] The Right Place: http://www.the-right-place.org/About-Us

Under Anniston's zoning code, certain community-integrated housing types for people with disabilities are restricted, namely group homes and rehabilitation homes. A group home, as defined by the code, is "a small, residential facility located within a community and designed to serve children or adults with chronic disabilities. These homes shall have five (5) or fewer occupants, unless the occupants are related by blood or marriage, and are staffed 24 hours a day by trained caregivers."[7] By definition, a group home for children or adults with disabilities is limited to five or fewer unrelated residents and therefore should be permitted in the same way as other single-family homes occupied by five or fewer residents. However, under the code's Permitted Use Table, group homes are only allowed in three zoning districts, whereas other single-family dwellings of five or fewer unrelated individuals are permitted by right in seven zoning districts. Rehabilitation homes for up to five unrelated occupants receiving rehabilitation for substance abuse, who live together as a single housekeeping unit, also are restricted to fewer residential zoning districts (only two) than other single-family housing.

4. **Disparities in Access to Opportunity**

   a. **To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning government services and facilities, public infrastructure, transportation, proficient schools and educational programs, and jobs.**

Access to government facilities, public infrastructure, and transit can be a considerable barrier for persons with disabilities, and can impact their ability to access educational and employment opportunities. Anniston's One City, One Vision Strategic Plan outlines several policy priorities related to improving access to opportunity for elderly residents and for the city's residents as a whole, but does not specifically include action items intended to address unique needs of people with disabilities. Among the Plan's action items are these:

- Create/Expand transportation system for the elderly
- Improve bus shelters/infrastructure
- Create a "One Stop Shop" at City Hall
- Develop more mixed income housing
- Develop a retirement community at Fort McClellan

   b. **Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.**

Anniston's zoning ordinance provides a process for requesting a variance, but has not adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. The purpose of a variance is different from

---

[7] The Code of the City of Anniston, Sec. 32 (definitions).

the purpose of that of a request for reasonable accommodation, as a variance requires a showing of special circumstances or conditions peculiar to the land. The Board of Adjustment has the power to hear and decide applications for variances following a public notice and hearing process. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities.

In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing and applies a standard based on the disabilities of the residents rather than the physical characteristics of the property. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities or unfounded speculation about threats to safety may impact the outcome.

    c. **Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.**

The American Community Survey does not provide tenure or homeownership rates for persons with a disability or by disability type, nor is this data available locally. Stakeholder input suggests some difficulties related to homeownership generally and in some cases, the degree of these difficulties could be greater for those with a disability.

- The poor condition of housing stock, especially in west Anniston, is a problem for low-income homeowners. They often need financial assistance with roof, porch, and bathroom repairs
- Some homeowners need but cannot afford the construction of handicapped accessibility ramps.
- It can be nearly impossible to obtain financing to buy or rehabilitate a home in West Anniston due to the environmental contamination.
- Banks won't finance loans for home purchases in some neighborhoods.
- There's steering by real estate agents.
- In some areas, sellers won't sell to people based on race or other factors.

5. **Disproportionate Housing Needs**

    a. **Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.**

HUD's Comprehensive Housing Affordability Strategy (CHAS) data provided for this analysis does not identify levels of housing need for persons with disabilities or by disability type. However, based on a standard Supplemental Security Income (SSI) payment of $735 per month (equating to an affordable rent of $220 or less), it is highly likely that disabled persons who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens.

6. **Additional Information**

    a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.**

No additional source of relevant information is locally available.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

Between 2012 and 2017, HUD received and investigated four complaints alleging housing discrimination. Of the four complaints, disability was cited as a basis in two cases, both of which were successfully settled. Further information is provided in the Fair Housing Enforcement, Outreach Capacity, and Resources Analysis in the following section.

7. Disability and Access Issues Contributing Factors

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

Priority Contributing Factors

- Lack of affordable, accessible housing in range of unit sizes
- Lack of assistance for housing accessibility modifications
- Land use and zoning laws
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

Non-Priority Contributing Factors

- Access to proficient schools for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Lack of affordable, integrated housing for individuals who need supportive services

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. **List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.**

For the recent five-year period—January 1, 2012 through October 15, 2017—no significant cases or precedential decisions were found regarding allegations of unlawful housing discrimination occurring in Anniston that resulted in federal litigation or a HUD ALJ decision.

The most recent federal FHA case found relating to housing in Anniston was filed in 2009 and settled and dismissed in 2010. In Rimmer v. ERA King Real Estate Company, Inc., Civil Action No. 1:09-cv-00405, (N.D. Ala., complaint filed Feb. 27, 2009), an African-American married couple sued a real estate company and one of its agents whom plaintiffs had hired to assist them in purchasing a home in Anniston. The complaint alleged state law causes of action including breach of contract and misrepresentation, and violations of the Fair Housing Act. Plaintiffs alleged that although they met the qualifications to purchase the subject property, Defendants refused to negotiate the sale of the house on their behalf and instead negotiated the sale to less qualified white purchasers. Defendants also allegedly failed to provide services as sales agents under the same terms and conditions offered and applicable to similarly-situated white individuals; falsely represented that the subject property was unavailable for purchase; participated in unlawful steering practices because of the Plaintiffs' race.

Defendants denied the allegations, denied that they had acted in a discriminatory manner because of Plaintiffs' race in violation of the FHA, and filed a motion for summary judgement. Following court ordered mediation, the parties settled the dispute without an admission or finding of liability and the case was dismissed on October 18, 2010.

2. **Describe any state or local fair housing laws. What characteristics are protected under each law?**

The Alabama Fair Housing Law (Ala. Code § 24-8-1 et seq.) mirrors the federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq.) in terms of its protections and the grievance and enforcement process. As with the FHA, the state law prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the FHA.

The AFHL contemplates the adoption of local fair housing laws and would give preference to a local agency to resolve a discriminatory housing complaint where the local ordinance has been certified by HUD as "substantially equivalent" to the FHA. (See Ala. Code § 24-8-12(c)). However, Anniston

has not adopted a local nondiscrimination or fair housing ordinance or established a local commission empowered to receive and resolve fair housing complaints.

3. **Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.**

The Anniston region has two primary sources of fair housing information, outreach, and enforcement: the Fair Housing Center of Northern Alabama (FHCNA) and the U.S. Department of Housing and Urban Development. The FHCNA is one of three nonprofit fair housing advocacy organizations in Alabama, each serving different regions of the state, that has been awarded grant funding under HUD's Fair Housing Initiatives Program (FHIP). FHIP funds help nonprofit organizations carry out investigations and other enforcement activities to prevent or eliminate discriminatory housing practices. Additionally, HUD – through its Atlanta Regional Office of Fair Housing and Equal Opportunity and Alabama Field Office – is a significant source of capacity for fair housing initiatives in the region.

The Fair Housing Center of Northern Alabama (FHCNA), headquartered in Birmingham and serving Calhoun County (including Anniston) and 26 other counties, exists to eliminate housing discrimination and to ensure equal housing opportunity for all people in northern Alabama through education, outreach, public policy initiatives, advocacy and enforcement. It is a FY 2016 FHIP grantee and was awarded $202,816 under the FHIP's private enforcement initiatives (PEI) grants category. The FHCNA has pledged to use its grant award to provide a systematic approach to combating unlawful housing practices, with services targeted toward: receiving housing discrimination complaints, interviewing potential victims of discrimination, and conducting preliminary investigations; systemic and complaint-based testing in insurance, sales, mortgage lending, accessibility/design/construction, and REO properties; conducting mediation and conciliation efforts; enforcing meritorious claims through litigation or referral to administrative enforcement agencies; and fair housing education and outreach activities.

Region IV of HUD's Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

HUD provides funding annually through the Fair Housing Assistance Program (FHAP) to State and/or local agencies that enforce fair housing laws certified by HUD as "substantially equivalent" to the substantive rights, procedures, remedies, and judicial review processes of the federal Fair Housing Act. Unfortunately, no state agency or non-governmental organization in Alabama has been qualified by HUD to participate in FHAP.

4. **Additional Information**

a. **Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**

An individual in Anniston who believes he or she has been the victim of an illegal housing practice under the FHA may seek assistance from the Fair Housing Center of Northern Alabama or file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. As a grantee under HUD's Fair Housing Initiatives Program, the FHCNA may receive and investigate complaints of alleged housing discrimination, conduct mediation and conciliation efforts; and refer meritorious claims to HUD or seek redress through litigation on behalf of the complainant.

After receiving a complaint of housing discrimination, HUD's Office of FHEO will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds "reasonable cause," HUD then issues a Charge of Discrimination and a hearing/trial will be scheduled before an administrative law judge. If the FHEO determines that there is no reasonable cause, the case is dismissed.

An aggrieved party may also opt to bypass these administrative routes and file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Unlike in a hearing before an administrative law judge, a federal district court may impose punitive damages in addition to the injunctive relief, actual damages, and civil penalties allowed in an administrative proceeding.

The advantages of seeking redress through the administrative complaint process are that proceedings are generally more expedited than the federal court trial process and HUD takes on the duty, time, and cost of investigating the matter for the complainant. Additionally, conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints filed with HUD

A request was made to HUD's Alabama FHEO field office for complaints received regarding housing units in Anniston for the period January 1, 2012 through October 4, 2017. The Atlanta Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints, and responded to the request for relevant complaint data.

From January 1, 2012 through October 4, 2017, HUD received four formal complaints of housing discrimination occurring within the jurisdiction of Anniston. All four reported cases involving perceived or alleged discrimination in housing have been closed. HUD closed two of the four cases administratively following its investigation into the allegations and finding a lack of sufficient

evidence to conclude that discrimination had occurred. The other two cases were closed following successful settlement or conciliation, though no damages were awarded to complainants.

Table 17. HUD Fair Housing Complaints, 2012-2017						
Case No.	Violation Zip Code	Filing Date	Closing Date	Basis	Issue	Closure Reason
04-13-0210-8	36202	12/11/12	03/06/13	Familial Status	Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination
04-13-0781-8	36201	06/04/13	09/06/13	Disability, Familial Status	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/ settlement successful
04-14-1007-8	36201	08/27/14	11/06/14	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination
04-16-4564-8	36201	04/26/16	06/14/16	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ settlement successful

More than one basis of discrimination may be cited in a single complaint. Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory issue. In the four complaints received and investigated by HUD, disability was cited as a basis of complaint in two cases, familial status in two cases, and race in one case. All of the reported cases involved the rental housing market rather than the for-sale/ownership market.

In the two cases which HUD negotiated or mediated conciliation/settlement, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

Complaints filed with the Fair Housing Center of Northern Alabama

Multiple requests were made via mail, phone message, and email to the FHCNA for data reflecting the number of complaints of housing discrimination it had received regarding housing units in Anniston for the period January 1, 2012 through September 21, 2017, the status of all such complaints, and the basis/bases of all such complaints. However, as of the writing of this draft, no response had been received from the FHCNA concerning this request.

    b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City of Anniston's previous Analysis of Impediments, prepared by the East Alabama Regional Planning and Development Commission, included the following strategies to remove or ameliorate affordable housing barriers:

- Development of affordable single and multi-family housing under the HOME program
- Rehabilitation of single and multi-family housing under the CDBG program
- Execution of a contract to provide fair housing education and outreach services
- Demolition of condemned properties to eliminate slums and blight

The City has regularly expended CDBG and HOME funds for these purposes including, most recently, a series of fair housing seminars for real estate agents and other housing industry professionals in 2016.

5. **Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

   Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

   Priority Contributing Factors
   - Lack of local private fair housing outreach and enforcement
   - Lack of local public fair housing enforcement
   - Lack of resources for fair housing agencies and organizations

   Non-Priority Contributing Factor
   - Lack of state or local fair housing laws

VI. Fair Housing Goals and Priorities

1. **For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**

Listed in the table below are the fair housing issues with their associated contributing factors. The contributing factors are organized into two groups: priority contributing factors are those that are most likely to limit or deny fair housing choice or access to opportunity; non-priority contributing factors are likely to also have a causal relationship to the fair housing issue, but are less directly or immediately able to remedy the named issue.

Table 18. Contributing Factors by Priority Level			
Housing Issue	**Priority Contributing Factors**	**Non-Priority Contributing Factors**	**Priority Justification**
Segregation/ Integration	• Impediments to mobility • Lack of community revitalization strategies • Lack of private investment in specific neighborhoods • Location of environmental health hazards • Location and type of affordable housing	• Lending discrimination • Lack of regional cooperation	Historical patterns of racial and ethnic segregation persist in Anniston today as a result of a combination of different factors. As residents of segregated neighborhoods move to other areas, those left behind are increasingly those without the means to move themselves. Poor environmental conditions have led to disinvestment and blight in these communities. Steering and lending discrimination, as well as a lack of coordination necessary to create significant affordable housing outside Anniston are also factors, but are less likely to lead to direct change.
Racially/Ethnically Concentrated Areas of Poverty	• Impediments to mobility • Lack of community revitalization strategies • Lack of private investment in specific neighborhoods • Location of environmental health hazards • Location and type of affordable housing	• Lending discrimination • Lack of public investment in specific neighborhoods • Lack of regional cooperation	R/ECAPs are the city's primary areas of segregation and the communities located in these areas are in need of reinvestment. Economic development and new affordable housing can help revitalize these areas, but remediation of environmental hazards will also be needed before significant investment can be attracted.

Disparities in Access to Opportunity	• Lack of private investments in specific neighborhoods • Lack of public investments in specific neighborhoods, including services or amenities • Location of environmental health hazards • Location and type of affordable housing	• Location of proficient schools and school assignment policies • Private discrimination	The portions of Anniston most lacking access to opportunity are the R/ECAP tracts in west Anniston. In these areas, increase workforce participation is needed to reduce poverty. A lack of proficient schools has a strong effect on all of Anniston, but the complexity of this issue makes it difficult to achieve near-term results.
Disproportionate Housing Needs	• Availability of affordable units in a range of sizes • Deteriorated and abandoned properties • Lack of private investment in specific neighborhoods • Location of environmental health hazards	• Lack of regional cooperation • Source of income discrimination / impediments to mobility • Lack of affordable housing for individuals who need supportive services	Members of some protected classes are disproportionately affected by certain housing problems, particularly be cost burden. Increasing the availability of affordable housing units and revitalizing communities where existing units exist to make them high-opportunity areas of choice will expand housing choice for affected protected classes.
Publicly Supported Housing Location and Occupancy	• Impediments to mobility • Lack of public investment in specific neighborhoods, including services and amenities • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs	• Community opposition • Lack of private investment in specific neighborhoods	Public housing in Anniston tends to be located in areas of low opportunity and high levels of poverty and racial segregation. Community revitalization to bring increased opportunity to these communities while at the same time providing greater support and resources to those residents desiring to move elsewhere will increase access to opportunity for public housing residents.

Disability and Access Issues	• Lack of affordable, accessible housing in range of unit sizes • Lack of assistance for housing accessibility modifications • Land use and zoning laws • State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings	• Access to proficient schools for persons with disabilities • Access to publicly supported housing for persons with disabilities • Lack of affordable, integrated housing for individuals who need supportive services	People with disabilities make up approximately a quarter of Anniston's population, yet accessible housing is not widely available and few plans or documents appear to recognize the unique housing needs of this population. Further, several elements of the City's zoning code appear to reduce housing availability and accessibility for people with disabilities.
Fair Housing Enforcement, Outreach Capacity, and Resources	• Lack of local private fair housing outreach and enforcement • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations	• Lack of state or local fair housing laws	Resources for fair housing enforcement and education are in short supply in Anniston. HUD receives very few housing discrimination complaints originating in Anniston, likely because complaints are not filed and not because discrimination does not occur. Anniston is technically served by a private fair housing organization based in Birmingham, but that group has not participated in this assessment and is not likely to be responsive to issues or complaints arising from Anniston or Calhoun County.

2. **For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
1. Implement place-based community investment strategies to increase opportunity measures, particularly in R/ECAPs	• Lack of community revitalization strategies • Lack of private investment in specific neighborhoods • Lack of public investments in specific neighborhoods, including services or amenities • Location and type of affordable housing • Availability of affordable units in a range of sizes • Deteriorated and abandoned properties • Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs	• Segregation/ Integration • Racially/ Ethnically Concentrated Areas of Poverty • Disparities in Access to Opportunity • Disproportionate Housing Needs • Publicly Supported Housing Location and Occupancy	1. Allocate CDBG funding for home repair and rehabilitation activities in R/ECAP tracts (annually, beginning January 2018) 2. Allocate CDBG and HOME funds for property acquisition and renovation in accordance with West Anniston Master Plan (annually, beginning January 2018) 3. Allocate funding for the demolition of unsafe and/or blighted structures in R/ECAPs (annually, beginning January 2018) 4. Review requests for support from LIHTC developers and issue letters of support as appropriate (annually, beginning January 2018)	City of Anniston
Discussion: The R/ECAP neighborhoods of west Anniston will require significant and prolonged investment in order to be revitalized into communities of choice for Anniston residents. Working together with partners including the Anniston Housing Authority and others, the City will strive for focused, impactful investment of CDBG, HOME, and other resources in west Anniston with a goal of priming the community for future private sector investment.				

2. Foster opportunities for greater mobility of low- and moderate-income residents	• Impediments to mobility	• Segregation/ Integration • Racially/ Ethnically Concentrated Areas of Poverty	1. Hold initial meeting between City and AHA staff to discuss development of mobility opportunities (April 2018) 2. Complete research and begin implementation of mobility program (October 2018) 3. Evaluate program's success and progress; recalibrate as needed (October 2019)	City of Anniston
Discussion: Anniston's low-income residents tend to concentrate in areas of poverty and with low levels of opportunity. Understanding that not all residents wish to leave their homes and neighbors behind to move to other areas that may have greater opportunities and amenities, those residents willing to make such a move should be encouraged and supported through the transition. The City, together with the Anniston Housing Authority, should study models for mobility counseling programs and should designate an existing staff person or office as a coordinator for mobility. This designee would be a coordinator to assist residents with evaluating their options, planning for a move, and becoming established in a new community of choice.				
3. Fund a dedicated CDBG subgrant to support local fair housing enforcement and education	• Lack of local private fair housing outreach and enforcement • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations	• Fair Housing Enforcement, Outreach Capacity, and Resources	1. Draft NOFA specifying fair housing services sought (August 2018) 2. Distribute NOFA to local organizations (October 2018) 3. Based on a review of proposals received, select an organization and initiate contract for fair housing services (January 2019) 4. Evaluate program's success and progress; recalibrate as needed (October 2019)	City of Anniston

Discussion: The Anniston region lacks sufficient enforcement and education resources and capacity to ensure fair housing for its residents. To increase the resources available locally, Anniston will begin annually setting aside a portion of its CDBG funds to be subgranted to a local responsive local organization that will implement a program of education and awareness. Specifically, the grant recipient should focus on educating landlords about their fair housing act responsibilities, the public on how to recognize discrimination and how to file a complaint. Within the first three years of funding the fair housing subgrant, a program to test the real estate sales and lending markets for discrimination should be considered for inclusion in the grantee's scope of work.				
4. Review and amend City ordinances as appropriate to further fair housing choice	• Land use and zoning laws • State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings	• Disability and Access Issues	1. Refer recommended ordinance revisions to planning staff and the City attorney for review. (March 2018). 2. Draft zoning amendment(s) as necessary (June 2018) 3. Adopt zoning amendments (August 2018)	City of Anniston
Discussion: Several provisions of Anniston's zoning code are recommended for review and revision to be more compliant with the Fair Housing Act and the further fair housing choice: 1) group homes should not face greater restrictions than traditional single-family homes with the same number of occupants; 2) a reasonable accommodation ordinance should be adopted to include specifics regarding the form that a request for accommodation should take; the time frame within which the reviewing authority must make a decision; the form that a decision must take and whether conditions may be attached; and how to appeal a decision; and 3) the family definition in the City's zoning ordinance should be amended to explicitly include relationships based on adoption or foster/legal guardianship.				
5. Support home accessibility modifications for people with disabilities	• Lack of affordable, accessible housing in a range of unit sizes • Lack of assistance for housing accessibility modifications	• Disability and Access Issues	1. Based on a review of CDBG and HOME proposals received, select at least one organization that will be contracted to perform home modifications for people with disabilities (January 2019) 2. Evaluate program's success and progress;	City of Anniston

			recalibrate as needed (October 2019)	

Discussion: Approximately one in four residents of Anniston has some type of disability, yet available accessible housing units are scarce. The City should annually consider reserving a portion of its CDBG funds to be granted to an organization or organizations that will assist residents with needed home modifications to make their homes more accessible. These modifications could include ramps, grab bars, door widening, and other related work as dictated by the needs of the beneficiary.

6. Continue progress toward mitigation of the effects of environmental contamination in west Anniston	• Location of environmental health hazards	• Segregation/ Integration • Racially/ Ethnically Concentrated Areas of Poverty • Disparities in Access to Opportunity • Disproportionate Housing Needs	1. The City will continue to implement its stormwater management plan and regularly monitor runoff for toxic contaminants (regularly, beginning January 2018)	City of Anniston

Discussion: Contamination of Anniston's municipal water source with TCE, though mitigated by added technology that removes pollutants from the water, has potential to affect all of Anniston's municipal water customers, an effect that would impact all residents regardless of their protected class status. However, other soil and water contamination issues primarily impact African American residents. The Monsanto site is located in an R/ECAP with a population that is 64.15% African American. In addition to heightened exposure to toxins in the environment, these primarily African American residents also bear the brunt of the blight and economic decline facing west Anniston as a result of the contamination. In order for West Anniston to be revitalized and to attract residents, economic development, and private investment, environmental contamination needs to be controlled and progress should continue toward mitigating its effects.