

Final Report

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Analysis of Impediments To
Fair Housing Choice
City of Fredericksburg, Virginia

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SECTION I. Introduction

In 2012, the City of Fredericksburg partnered with Brian Auricchio and Brianna Gavigan, students from the University of Mary Washington, to conduct an Analysis of Impediments to Fair Housing Choice (AI) for the City of Fredericksburg. This section introduces the study, provides information on the Fair Housing Act and the State of Virginia fair housing law, and presents the methodology used in the research.

Analysis of Impediments Background

The AI is a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sectors. The AI is required for the City to be able to receive federal housing and community development block grant funding.

The AI involves:

- A review of the City's laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location, availability and accessibility of housing; and
- An assessment of public- and private-sector conditions affecting fair housing choice.

According to HUD, impediments to fair housing choice include:

- Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices *on the basis of* race, color, religion, sex, disability, familial status or national origin.

Although the AI itself is not directly approved or denied by HUD, its submission is a required component of the City's Consolidated Plan for Housing and Community Development (Consolidated Plan) performance reporting. HUD encourages AIs to accomplish the following:

- Serve as the substantive, logical basis for fair housing planning;
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts, both within a jurisdiction's boundaries and beyond.

Federal Fair Housing Act. The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

HUD has the primary authority for enforcing the Federal Fair Housing Act. HUD investigates complaints and determines if there is a “reasonable cause” to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the U.S. Department of Justice brings the claim on behalf of the plaintiff).

State and local fair housing ordinances. Virginia’s fair housing law (Chapter 5.1, Title 36, of the Code of Virginia (1950) as amended) prohibits discrimination in housing on the basis of race, religion, color, national origin, sex, elderliness, familial status (children under age 18), and handicap. Virginia has a substantially equivalent law to the Federal Fair Housing Act, although Virginia’s fair housing law includes elderliness as a protected class, which is broader than the federal fair housing law. Elderliness means anyone over 55 years. Some of the transactions that the state fair housing law applies to include: renting an apartment, buying a home, obtaining a mortgage and obtaining homeowner’s insurance.

The Virginia Fair Housing Office investigates allegations of housing discrimination under Virginia’s Fair Housing Law. Anyone who believes they have been discriminated against in housing may file a complaint with Virginia’s Fair Housing Office. If the complaint is accepted, it will be investigated and assigned for conciliation. If conciliation is successful, the investigation will be suspended. If conciliation is unsuccessful and if it appears that discrimination occurred, the Fair Housing Office will present the evidence obtained during its investigation to the Real Estate Board. Generally, after reviewing the evidence, the Real Estate Board dismisses the complaint, accepts the conciliation agreement, or issues a charge of discrimination against the respondents. A charge issued by the Board will be immediately referred to the Attorney General’s Office.

The Virginia Fair Housing Office has been certified by HUD as a substantially equivalent agency. As a result, HUD refers most of the Fair Housing complaints that it receives from Virginia residents to Virginia's Fair Housing Office.

The State of Virginia has also enacted the Virginia Residential Landlord and Tenant Act (Chapter 13.2, Title 55, of the Code of Virginia as amended). This law governs the rental of dwelling units and the rights and obligations of landlords and tenants; encourages landlords and tenants to maintain and improve the quality of housing; and establishes a single body of law relating to landlord and tenant relations throughout Virginia. Rappahannock Legal Services, Inc. (RLS) produces a guide to the Virginia Landlord-Tenant Law and Local Rental Housing in Planning District 16. The most recent guide was completed in 2012 and describes equal opportunities in housing, gives an overview of the Landlord-Tenant Law, and provides rental housing information for Fredericksburg and the counties of Caroline, King George, Spotsylvania and Stafford.

The City of Fredericksburg does not have its own Fair Housing Ordinance.

Citizen Participation

As part of the public outreach process for Fredericksburg AI, a random survey of 251 Fredericksburg residents was conducted to gather information about their experience with fair housing. Fifteen key person interviews were conducted with individuals knowledgeable about fair housing issues and housing and social service needs in the City of Fredericksburg. In addition, three public forums, including a presentation on fair housing, were provided for the general public.

Funding

The AI research and report were unfunded, as Brian Auricchio and Brianna Gavigan served as unpaid interns, earning college credits from the University of Mary Washington. Plan implementation is funded by CDBG entitlement funds, general funds, and leveraged resources in coordination with local non-profit organizations and other government organizations.

Review of City's Progress to Fair Housing

The City of Fredericksburg conducted an initial AI in 1996, with updates completed in 1997 and 2003. BBC Research and Consulting (BBC) conducted a complete analysis again in 2007. Many of the goals and objectives of the 2007 AI have been successfully achieved and, in some instances, exceeded.

The City continued to work with Rappahannock Legal Services during the past 5 years to provide education, counseling, and legal defense related to the Virginia Residential Landlord Tenant Act. City funding allowed RLS to continue to update the “Guide to Virginia Landlord-Tenant Law and Local Rental Housing in Planning District 16,” to assist persons looking for housing.

The City also created a Fair Housing webpage which promotes awareness about fair housing laws and where to file a complaint. The City has also made proactive efforts to remind landlords about fair housing laws through the Commission of the Revenue’s annual mailing of the landlord licensing documents. In addition, City staff has conducted several fair housing public forums and public outreach efforts at events over the last five years.

Research Methodology

The project team’s approach to the Fredericksburg AI was based on the report conducted in 2007 by BBC and the methodologies recommended in HUD’s *Fair Housing Planning Guide, Vol. I*. and on the analysis that had been recently completed for the City’s Consolidated Plan.

The work scope consisted of the following:

Task 1. Project initiation. City staff briefed Auricchio and Gavigan about work tasks, the project schedule, reporting relationships, and overall expectations of the project. The team collected relevant data, identified potential candidates for key person interviews, and discussed the public participation components of the study.

Task 2. Community and housing profile. The project team used current data on population and households from the 2010 Census, 2008-2010 American Community Survey (ACS), and 2006-2010 ACS to produce a community and housing profile to provide background data for the AI. The team also worked closely with Fredericksburg Regional Alliance to compile population projections.

Task 3. Fair lending and complaint data review. The team analyzed lending institution data from the Community Reinvestment Act (CRA) ratings and complaint data from HUD and the Virginia Fair Housing Office to understand the basis of housing discrimination complaints received and legal cases filed by organizations.

Task 4. Policy review and analysis. The team examined housing policies and programs that influence fair housing choice through a review of the City’s zoning regulations and land use policies, and from discussion with key persons knowledgeable about such policies. The team also interviewed the Central Virginia Housing Coalition to understand the organization’s programs.

Task 5. Key person interviews. The team interviewed city planning and code enforcement officials, to obtain information about the City’s current land use and housing policies. The team also interviewed an affordable housing developer in the area as well as representatives from agencies serving special needs populations.

Task 6. Public forum and telephone survey. As part of the AI, the City of Fredericksburg held a public forum in late March. The team also participated in two other public meetings to discuss fair housing concerns with residents and to provide fair housing information. A random survey of 251 Fredericksburg residents was also conducted, to gather information about their experience with fair housing and knowledge of fair housing laws.

Task 7. Identification of impediments and development of the Fair Housing Action Plan. The team examined its findings to determine what barriers to fair housing exist in the City of Fredericksburg. The findings and identified impediments are detailed in Section VI of the report. This section also includes developed a recommended Fair Housing Action Plan for addressing the identified impediments.

Report Organization

The balance of this document contains five sections:

Section II. Community and Housing Profile;

Section III. Citizen and Key Person Input;

Section IV. Fair Lending, Complaint, and Legal Review;

Section V. Public Sector Review; and

Section VI. Identification of Impediments to Fair Housing Choice and Recommendations.

SECTION II. Community and Housing Profile

Introduction

This section of the AI describes the population, housing patterns, and socioeconomic characteristics of residents in Fredericksburg as well as in surrounding areas, to provide the context of the fair housing analysis.

In order to receive Community Development Block Grant Funding (CDBG), Fredericksburg is required to “affirmatively further fair housing choice” by identifying barriers to fair housing in the city and then work to mitigate fair housing impediments. This study focuses primarily on the City of Fredericksburg, but because fair housing conditions in Fredericksburg are influenced by demographic and housing conditions in surrounding communities, statistics for Culpeper, Manassas, Richmond, Spotsylvania, and Stafford County are reported where relevant.

The data collected and analyzed for this section were gathered from the 2000 and 2010 U.S. Census, 2006-2010 and 2008-2010 American Community Surveys, projections from the Fredericksburg Regional Alliance (FRA), the City of Fredericksburg, HUD, and the Bureau of Labor Statistics.

General Demographics

Population. The 2010 U.S. Census reported a population of 24,286 persons for the City of Fredericksburg, up from 19,279 persons in 2000. From 2000 to 2010, the City’s population grew at a compound annual rate of 26 percent. As shown in Exhibit II-1 below, Fredericksburg has the fifth largest population in 2010 of the areas shown.

Exhibit II-1**Population Trends, City of Fredericksburg and Surrounding Areas, 2000 to 2010**

Jurisdiction	2000 Census	2010 Census	FRA 2015 Projections	Percent Change 2000-2010
Fredericksburg	19,279	24,286	25,056	26.00%
Culpeper	9,664	16,379	x	69.50%
Manassas	35,756	37,821	49,728	6.70%
Richmond	197,790	201,272	204,365	3.20%
Spotsylvania County	90,395	122,397	131,801	35.40%
Stafford County	92,446	128,961	136,739	39.50%

Source: 2000 and 2010 U.S. Census, Fredericksburg Regional Alliance

Gender and age distribution. In 2010, Fredericksburg's residents were 54.1 percent female and 45.9 percent male. This was the largest gender gap for any of the six jurisdictions. Manassas had the most equal distribution with 49.9 percent female and 50.1 percent male residents.

The largest age cohort for the City of Fredericksburg in 2010 was residents aged 18 to 24, likely caused by the presence of the University of Mary Washington. Exhibit II-2 below shows the age distribution for the City of Fredericksburg for 2000 and 2010.

Exhibit II-2
Age Distribution, City of Fredericksburg, 2010

Age Cohort	2000 Census	2010 Census	Percent Change from 2000 to 2010
Under 18	3,428	4,779	39.4%
18 to 24	4,595	5,649	22.9%
25 to 34	2,856	3,808	33.3%
35 to 44	2,385	2,732	14.5%
45 to 54	2,138	2,753	28.8%
55 to 64	1,407	2,215	57.4%
65 and older	2,470	2,413	-2.3%

Source: 2000 and 2010 U.S. Census

Persons with disabilities. In 2000, the Census definition of disability status was based on individuals' answers to several Census survey questions. According to the Census, individuals have a disability if any of the following three conditions were met: (1) they were 5 years old and over and had a response of "yes" to a sensory, physical, mental, or self-care disability, (2) they were 16 years old and over and had a response of "yes" to going-outside-the-home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

The 2000 Census definition of disability encompassed a broad range of categories, including physical, sensory, and mental disabilities. Within these categories, persons with disabilities were those who experienced difficulty with any of the following:

- Performing certain activities such as dressing, bathing, or getting around inside the home (self-care disability);
- Going outside the home alone (going-outside-home disability); or
- Working at a job or business (employment disability).

Persons with disabilities included individuals with both long-lasting conditions, such as blindness, and individuals who had a physical, mental, or emotional condition lasting 6 months

or more than made it difficult to perform certain activities. All disability data from the Census were self-reported by respondents.

As stated by American Fact Finder 2, “The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended.”

The disability data that follows is provided by the American Community Survey 3-Year Estimates from 2008-2010, which is based on the “December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities” (American Fact Finder).

Exhibit II-3

Amount of Total Population with a Disability, City of Fredericksburg, 2010

Age Cohort	Total Population	Population with a Disability	Percent of Total Population
Under 5	1,454	16	1.1%
Ages 5 to 17	3,286	76	2.3%
Ages 18 to 64	16,471	1,452	8.8%
Ages 65 and older	2,372	751	31.7%
Total	23,583	2,295	9.7%

Source: 2008-2010 American Community Survey Three-Year Estimates

It is estimated that 2,295 people over the age of four in Fredericksburg live with at least one type of disability. That is approximately 9.7 percent of Fredericksburg’s total population. As shown, it is much more common for Fredericksburg’s older population to have a disability. Approximately 31.7 percent of Fredericksburg residents who are 65 and older have at least one type of disability based on the American Community Survey estimates from 2008-2010. Exhibit II-4 below shows the distribution of population by disability type in Fredericksburg.

Exhibit II-4**Population by Type of Disability, City of Fredericksburg, 2008-2010**

One Type of Disability	Population with Specific Disability
Hearing difficulty	631
Vision difficulty	580
Cognitive difficulty	524
Ambulatory difficulty	1,301
Self-care difficulty	514
Individual living difficulty	726
Total	4,276

Source: 2008-2010 American Community Survey Three-Year Estimates

Note: The totals do not match the total population because of the margin of error in the American Community Survey report. There is also no category for people with two or more types of disability, so those falling in this category were counted twice.

Race and ethnicity. Data on race and ethnicity require an introduction about how the U.S. Census Bureau collects and analyzes the data. In its surveys, the Census asks two different questions about race and ethnicity: the first asks respondents to identify their race; the second asks whether respondents are of Hispanic/Latino origin. The Census Bureau does not classify Hispanic/Latino as a race, but rather as an identification of origin and ethnicity. If a respondent reported Hispanic/Latino ethnicity but did not mark a specific race category, they are classified in the “Some Other Race” category. Persons of Hispanic/Latino descent most commonly report their race as “White” or “Some Other Race.”

As shown in Exhibit II-5, the majority of Fredericksburg’s residents are White (60.8 percent). The next largest racial categories are Black/African American at 22.1 percent and Multiple Races at 3.06 percent. Approximately 11 percent of the City’s population reported to be of Hispanic/Latino ethnicity in 2010.

Exhibit II-5**Distribution of Race and Ethnicity, City of Fredericksburg and Surrounding Areas, 2010**

Race/Ethnicity	Fredericksburg	Culpeper	Manassas	Richmond	Spotsylvania County	Stafford County
American Indian/Alaska Native	0.40%	0.40%	0.60%	0.30%	0.30%	0.40%
Asian	2.8%	1.3%	5.00%	2.30%	2.30%	2.80%
Black/African American	22.6%	15.8%	13.7%	50.6%	15.30%	17.00%
Native Hawaiian/Other Pacific Islander	0.10%	x	0.10%	0.10%	x	0.10%
White	64.20%	75.1%	61.7%	40.8%	75.5%	72.50%
Other Race	0.26%	x	x	x	x	x
Two or more races	3.90%	2.80%	4.30%	2.30%	3.30%	4.00%
Hispanic/Latino	10.70%	8.90%	31.4%	6.30%	7.60%	9.20%

Source: 2010 U.S. Census

Population Growth. The Hispanic/Latino population of all areas grew much faster than any single race. The Fredericksburg Hispanic/Latino population more than doubled from 4.9 percent of the total population in 2000 to 10.7 percent of the total population in 2010.

Distribution within Fredericksburg. One of the key components of fair housing is an examination of the concentration of racial and ethnic minorities within a jurisdiction, to detect evidence of segregation. In some cases, minority concentrations are a reflection of preferences - e.g., minorities may choose to live near family and friends of the same race/ethnicities or where they have access to grocery stores or restaurants that fit their needs. In other cases, minority populations are intentionally steered away or discouraged from living in certain areas. Housing prices can also greatly influence where minorities live, to the extent that there are economic disparities among persons of different races and ethnicities.

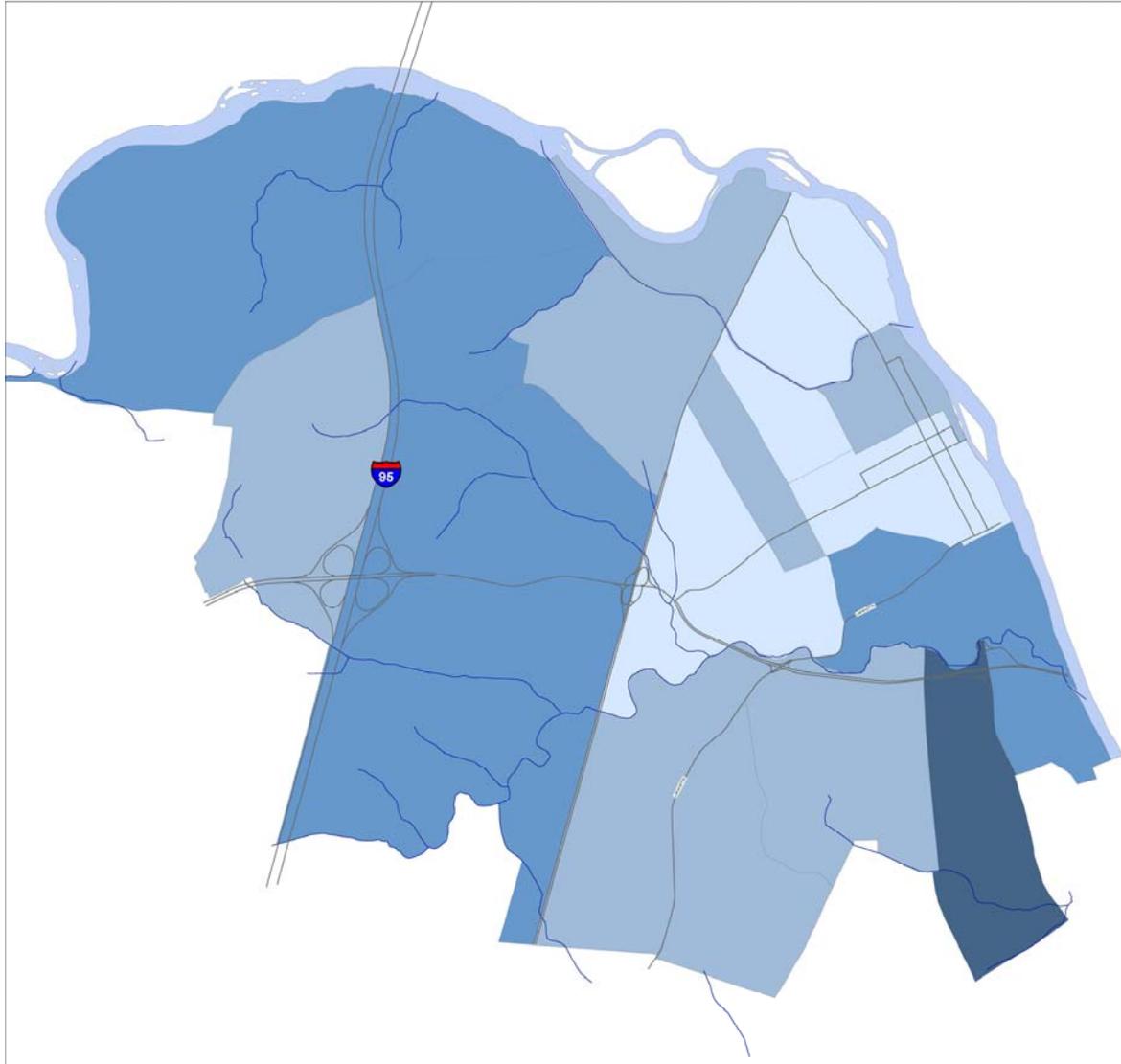
Exhibits II-6 and II-7 show the distribution of Fredericksburg residents who classified themselves as Black/African American and Hispanic, by block group, in 2010. Exhibit II-8 shows the percentage of residents who are White, by block group, in 2010 for a comparison.

As shown by Exhibit II-6, Fredericksburg's Black/African American population is largely located in the western and southeastern portions of the City. The block group located in the southeastern portion of the city, known as the Mayfield Neighborhood, had the highest percentage of Black/African American residents in the City.

Exhibit II-7 shows that the City's Hispanic population is largely located in the western and south central portions of the City.

For comparison purposes, Exhibit II-8 shows the distribution of Fredericksburg residents who classified themselves as White in the 2010 Census.

Exhibit II-6
Percentage of Black/African American Residents, by Census Block Group, City of Fredericksburg, 2010



Legend

Road Centerlines

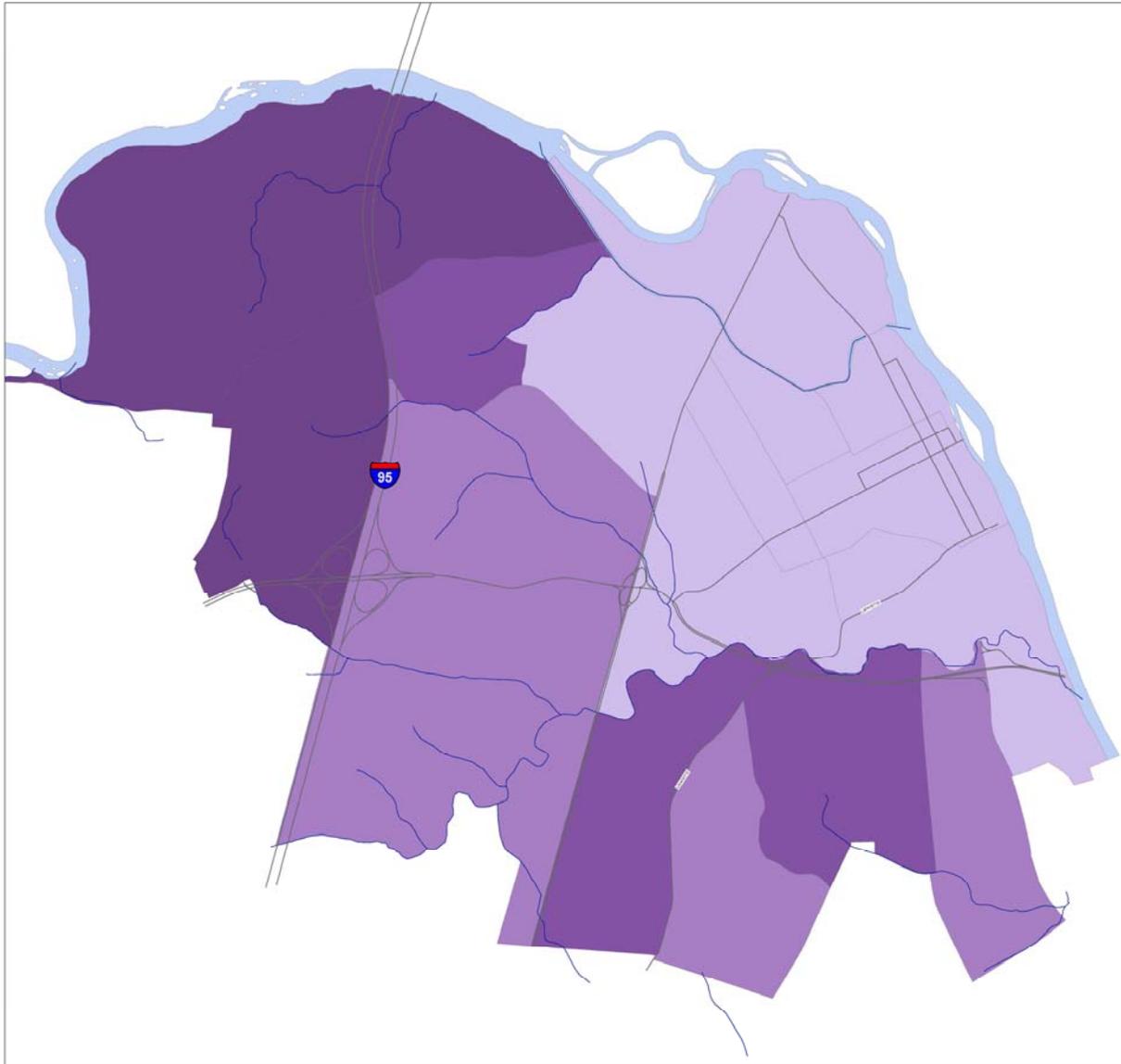
— Road Centerlines

Percentage of Black / African American, Non-Hispanic Residents by Census Block Groups

- < 10 %
- 10.1 % to 20 %
- 20.1 % to 40 %
- 40.1 % to 93.1%

Source:
U.S. Census 2010.

Exhibit II-7
Percentage of Hispanic Residents, by Census Block Group, City of Fredericksburg, 2010



Legend

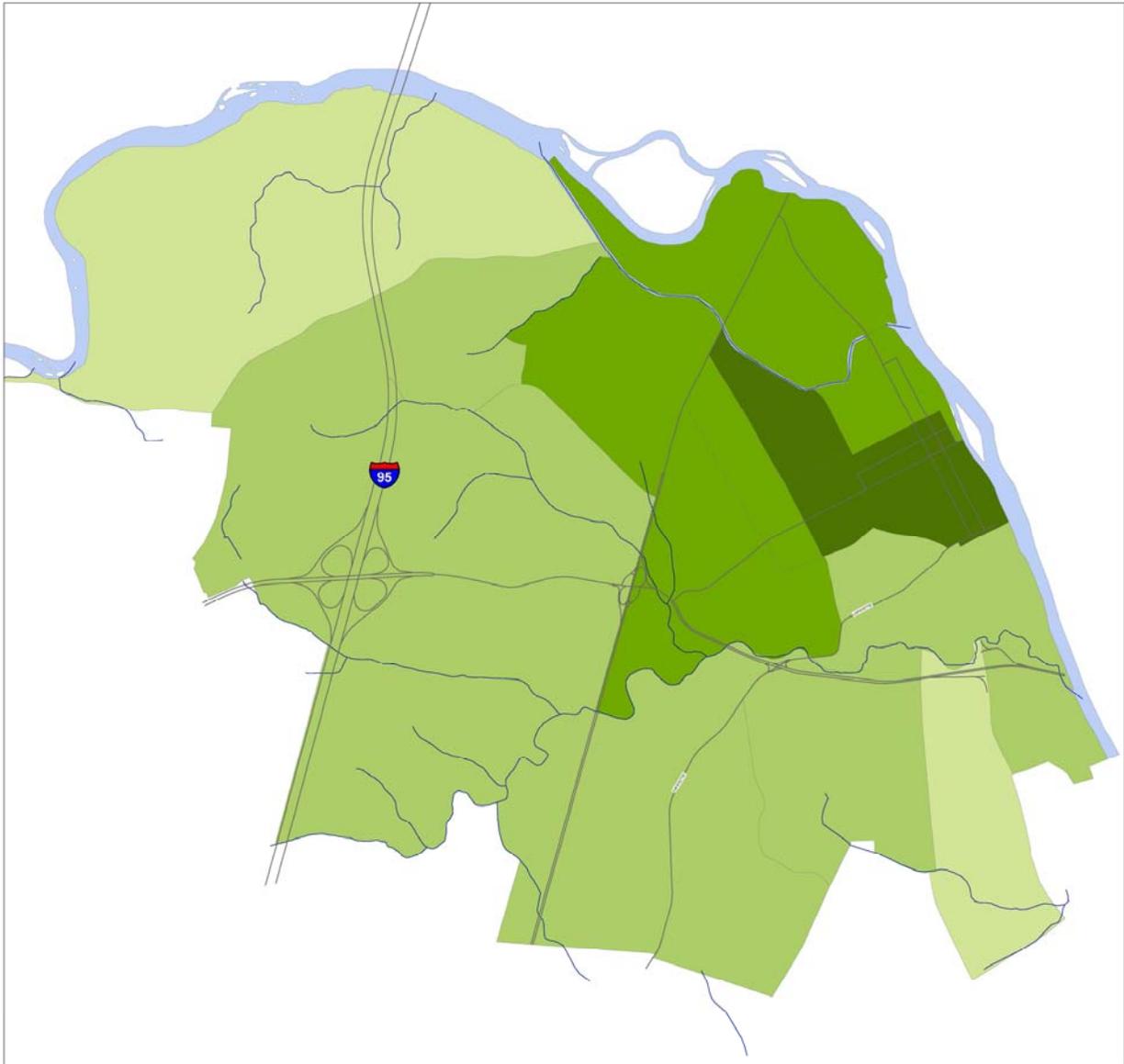
Road Centerlines
— Road Centerlines

Percentage of Hispanic, Any Race, Residents by Census Block Groups

-  < 5 %
-  5.1 % to 15 %
-  15.1 % to 30 %
-  30.1 % to 40 %

Source:
U.S. Census 2010.

Exhibit II-8
Percentage of White Residents, by Census Block Group, City of Fredericksburg, 2010



Legend

Road Centerlines
— Road Centerlines

Percentage of White, Non-Hispanic Residents by Census Block Groups

- < 30 %
- 30.1 % to 70 %
- 70.1 % to 85 %
- 85.1 % to 100 %

Source:
U.S. Census 2010.

Housing Units. From 2000 to 2010, Fredericksburg increased by 2,365 housing units, at a compound annual growth rate of 29.2 percent. Stafford County housing units increased by 45.7 percent and Spotsylvania grew by 44.0 percent from 2000 to 2010. The following exhibit shows the number of housing units for the years 2000 and 2010 for Fredericksburg and the five surrounding areas.

Exhibit II-9

Number of Housing Units, City of Fredericksburg and Surrounding Areas, 2000 to 2010

Jurisdiction	2000 Census	2010 Census	Percent change from 2000 to 2010
Fredericksburg	8,102	10,467	29.2%
Culpeper	3,848	6,271	63.0%
Manassas	11,757	13,123	11.6%
Richmond	84,549	98,349	16.3%
Spotsylvania County	31,308	45,185	44.3%
Stafford County	30,187	43,978	45.7%

Source: 2000 and 2010 U.S. Census, Housing Characteristics

Discrimination based on familial status and large households is a common fair housing issue in many communities. The following is a discussion of a few household characteristics which correlate to fair housing and affordable housing.

Familial status. In 2010, the number of family households versus non-family households was very comparable. There were tremendous disparities between female householders and male householders within family households. Over one-quarter of households were headed by a female with no husband (28.6 percent), compared to 8.7 percent headed by a male with no wife.

Exhibit II-10
Household Type, City of Fredericksburg, 2010

Household type	Number	Percent
Family household	4,854	51.1%
Husband-Wife	3,044	62.7%
Male householder - no Wife	422	8.7%
Female householder - no Husband	1,388	28.6%
Non-family household	4,651	49.0%
Male householder	2,104	45.2%
Female householder	2,547	54.8%
Total occupied	9,505	100%

Source: 2010 U.S. Census

NOTE: A household that has at least one member of the household related to the householder by birth, marriage, or adoption is a "Family household." All persons living in family households are included in this total regardless of their relationship to the householder. Same-sex couple households are included in the family household category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder present are tabulated in nonfamily households. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

"Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

Household size. As shown by Exhibit II-11 below, the average household size in 2000 was 2.09 persons and grew to 2.28 persons in 2010 for the City of Fredericksburg, which remained the smallest average household size of the six areas. In 2010, Manassas had the largest average household size of 3.02 persons per household.

Exhibit II-11
Average Household Size, City of Fredericksburg and Surrounding Areas, 2000 to 2010

Jurisdiction	Owners 2010	Renters 2010	All households 2000	All households 2010
Fredericksburg	2.35	2.24	2.09	2.28
Culpeper	2.80	2.77	2.48	2.78
Manassas	2.99	3.06	2.91	3.02
Richmond	2.23	2.17	2.21	2.20
Spotsylvania County	2.29	2.85	2.87	2.91
Stafford County	3.01	2.90	3.01	3.00

Source: 2000 and 2010 U.S. Census

Household income. The 2006-2010 American Community Survey 5-Year Estimates reported that the City of Fredericksburg's median household income was \$43,558, which is a 24.5 percent increase from 2000. Richmond had the lowest median household income (\$38,266) of all of the six areas and Stafford County had the highest (\$93,065).

Exhibit II-12

Median Household Income, City of Fredericksburg and Surrounding Areas, 2000 and 2010

Jurisdiction	2000 Census	2010 ACS	Percent Change 2000 to 2010
Fredericksburg	\$34,721	\$43,558	24.5%
Culpeper	\$36,725	\$57,908	57.7%
Manassas	\$60,447	\$75,173	24.4%
Richmond	\$31,401	\$38,266	21.9%
Spotsylvania County	\$57,601	\$76,574	32.9%
Stafford County	\$67,044	\$93,065	38.8%

Source: 2000 U.S. Census and 2006-2010 American Community Survey 5-Year Estimates

Housing needs are determined from updated 2009 Census data. Exhibit II-13 displays income categories split between renters and owners.

Exhibit II-13

Income Categories for Renters and Owners, City of Fredericksburg, 2010

Income Category	Renters	Owners
Extremely low-income (30% of area median income or below)	1,790	335
Low-income (30-50% of area median income)	1,365	395
Middle-income (80-95% of area median income)	480	1,830

Source: 2010-2015 Consolidated Plan for Community Development Programs

Households in poverty. The poverty threshold is established at the federal level and updated annually. It is adjusted for household size but not by geographic area, except for Alaska and Hawaii. In 2011, the poverty threshold for a family of four was \$22,350. In 2010, 20.8 percent of the population in Fredericksburg or about 2,600 people lived below the poverty threshold. The poverty rate is the highest for those under 18 living in Fredericksburg: approximately 27.5

percent live in poverty or an equivalent of about 1,292 people in 2010. Poverty rates were lowest for the City's seniors. Exhibit II-14 shows the percentage of Fredericksburg's population living in poverty by age cohort.

Exhibit II-14
Poverty by Age, City of Fredericksburg, 2008-2010

Age Cohort	Population Below Poverty Line	Percent of Total Age Group
Under 18	1,292	27.5%
18 to 64	3,011	21.1%
65 and older	131	5.5%
Total	4,434	20.8%

Source: 2008-2010 American Community Survey 3-Year Estimates

Employment Profile

According to the Virginia Economic Development Partnership's Community Profile of the City of Fredericksburg, Virginia, Fredericksburg had a civilian labor force of 13,310 in 2010. The U.S. Department of Labor stated that in March 2011, Fredericksburg's unemployment rate was 9.5 percent. In March 2012, the unemployment rate dropped to 8.3 percent, a net change of -1.2 percent.

Exhibit II-15
Unemployment Rate, City of Fredericksburg, 2000-2012



Source: U.S. Department of Labor Statistics, March 2012

Note: Not Seasonally Adjusted

Employment and wages by industry. According to the Virginia Employment Commission, the City of Fredericksburg had 24,873 employees at the end of the 2nd Quarter, 2011. The single largest industry was Health Care and Social Assistance, with just over 26 percent of the workforce (6,519 employees). Transportation and Warehousing was the smallest industry, with less than 1 percent of the workforce (110 employees). The average annual salary for Fredericksburg residents was \$38,480. Federal Government employees made the highest annual salary (\$73,840) while those in Accommodation and Food Services made the smallest annual salary (\$15,652). Exhibit II-16 below shows the average weekly wage figures for Fredericksburg.

Exhibit II-16

Industry Annual Salaries by Wage Category, City of Fredericksburg, 2nd Quarter, 2011

Industry	Average Employment	Percent of All Industries	Average Weekly Wage	Equivalent Salary
All Industries	24,873	100%	\$740	\$38,480
Low-Wage Industries				
Accommodation and Food Services	4,242	17%	\$301	\$15,652
Arts, Entertainment and Recreation	337	1%	\$304	\$15,808
Retail Trade	3,729	15%	\$437	\$22,724
Administrative and Waste Services	604	2%	\$458	\$23,816
Educational Services	231	<1%	\$468	\$24,336
Other Services, Ex. Public Administration	808	3%	\$531	\$27,612
Moderate-Wage Industries				
Local Government	1,962	8%	\$702	\$36,504
Transportation and Warehousing	110	<1%	\$703	\$36,556

Manufacturing	384	2%	\$753	\$39,156
Real Estate and Rental and Leasing	367	1%	\$827	\$43,004
Construction	519	2%	\$840	\$43,680
Wholesale Trade	551	2%	\$842	\$43,784
High-Wage Industries				
Information	573	2%	\$911	\$47,372
State Government	1,158	5%	\$925	\$48,000
Finance and Insurance	650	3%	\$1,004	\$52,208
Health Care and Social Assistance	6,519	26%	\$1,051	\$54,652
Professional, Scientific, and Technical Services	1,066	4%	\$1,122	\$58,344
Management of Companies	656	3%	\$1,216	\$63,232
Federal Government	344	1%	\$1,420	\$73,840

Source: Virginia Employment Commission, Quarterly Census of Employment and Wages (QCEW), 2nd Quarter (April, May, June) 2011

The statistics for average employment, percent of all industries, average weekly wage, and equivalent annual salary are compiled above and each industry is categorized as a Low-, Moderate-, or High-Wage industry based on its annual salary. Those industries with annual salaries 80 percent or less of the average annual salary (\$38,480) are classified as Low-Wage; industry annual salaries between 80 and 120 percent of the average annual salary are Moderate-Wage; industry annual salaries above 120 percent of the average annual salary are High-Wage.

Projections of employment growth by type. The Virginia Employment Commission also provides employment projections for the Bay Consortium, a geographic area that includes Fredericksburg. Exhibit II-17 displays those projections.

Exhibit II-17
Employment Growth by Industry, Bay Consortium, 2008 to 2018

Industry	Estimated 2008	Projected 2018	Numerical Change	Percent Change
Agriculture, Forestry, Fishing and Hunting	***	***	***	***
Mining, Quarrying, and Oil and Gas Extraction	***	***	***	***
Utilities	515	485	-30	-5.83%
Construction	10,235	12,259	2,024	19.78%
Manufacturing	9,989	9,493	-496	-4.97%
Wholesale Trade	5,021	5,444	423	8.42%
Retail Trade	21,703	23,018	1,315	6.06%
Transportation and Warehousing	3,118	3,340	222	7.12%
Information	2,020	2,047	27	1.34%
Finance and Insurance	7,532	8,561	1,029	13.66%
Real Estate and Renting and Leasing	1,853	2,098	245	13.22%
Professional, Scientific, and Technical Services	9,263	12,875	3,612	38.99%
Management of Companies and Enterprises	1,774	1,879	105	5.92%
Administrative and Support and Waste Mgmt.	4,415	5,352	937	21.22%

Educational Services	16,973	20,409	4,436	35.08%
Health Care and Social Assistance	16,129	21,787	5,658	35.08%
Arts, Entertainment, and Recreation	2,007	2,505	498	24.81%
Accommodation and Food Services	14,893	16,689	1,796	12.06%
Other Services (except Public Administration)	5,439	6,096	657	12.08%

Note: Asterisks (***) indicate non-disclosable data.

Projections data is for Bay Consortium (LWIA XIII). No data available for Fredericksburg city.

Source: Virginia Employment Commission, Long Term Industry and Occupational Projections, 2008-2018.

The industry projected with the highest percentage of employment growth in the Bay Consortium is Professional, Scientific, and Technical Services (38.99 percent growth). The next two largest projections are Educational Services and Health Care and Social Assistance (both predicted to grow 35.08 percent). In 2008, the largest industry by employment was Retail Trade, employing approximately 21,703 people. In 2018, Retail Trade is still projected to be the highest employing industry, with 23,018 employees.

Commuting and transportation patterns. The 2010 Census Bureau, Center for Economic Studies, also provides commuting patterns for workers in the Fredericksburg area.

Exhibit II-18

Commuting Patterns, City of Fredericksburg, 2010

Community Pattern	Number of Workers
Live and work in area	1,941
In-Commuters	18,558
Out-Commuters	7,231
Net In-Commuters	11,327

Source: 2010 Census Bureau, Center for Economic Studies

There are 1,941 residents of Fredericksburg who live and work in Fredericksburg, while 7,231 residents commute outside the City to their place of employment. In contrast, 18,558 people enter Fredericksburg every day to work. In Fredericksburg, there are 20,499 people employed. There is a net in-commuter population of 11,327.

Housing Profile

According to the 2010 United States Census, there were 10,467 housing units in Fredericksburg. The following Exhibit II-19 shows the number of housing units for the years 2000 and 2010 for Fredericksburg and the five surrounding areas.

Exhibit II-19

Number of Households, City of Fredericksburg and Surrounding Areas, 2000 and 2010

Jurisdiction	2000 Census	2010 Census	Percent Change 2000 to 2010
Fredericksburg	8,888	10,467	18%
Manassas	12,114	13,123	7%
Culpeper	4,056	6,271	54%
Richmond	92,282	98,349	7%
Spotsylvania County	33,329	45,185	36%
Stafford County	31,405	43,978	40%

Source: 2000 and 2010 U.S. Census

In 2010, 91 percent of Fredericksburg's housing units were occupied. The remaining 962 units (9 percent) were vacant. This vacancy rate is slightly smaller than found in Richmond at 11 percent. The five surrounding areas had vacancy rates ranging from 4 to 8 percent.

Tenure. Approximately 38 percent of occupied housing units in Fredericksburg in 2010 were owner-occupied, meaning roughly 62 percent were renter-occupied. The distribution is quite different from the other surrounding areas, aside from the City of Richmond, which is 43 percent owner-occupied and 57 percent renter-occupied. Spotsylvania County contains 79 percent owner-occupied units and only 21 percent renter-occupied units. The following Exhibit II-20 details the number and percentage of owner- and renter-occupied units in Fredericksburg and the five surrounding areas.

Exhibit II-20**Number and Percent of Units Owner- and Renter-Occupied, City of Fredericksburg and Surrounding Areas, 2010**

Jurisdiction	Number Owner-Occupied	Percent Owner-Occupied	Number Renter-Occupied	Percent Renter-Occupied
Fredericksburg	3,623	38%	5,882	62%
Culpeper	3,309	57%	2,733	43%
Manassas	8,043	64%	4,484	36%
Richmond	37,596	43%	49,555	57%
Spotsylvania County	33,258	79%	8,684	21%
Stafford County	32,339	77%	9,430	23%

Source: 2010 U.S. Census

Cost of housing. Based on the 2006-2010 American Community Survey 5-Year Estimates, the median home value in Fredericksburg was \$335,800; the median monthly rent was \$1,030. Exhibit II-21 below distributes the monthly rents and house values for Fredericksburg.

Exhibit II-21**Home Values and Monthly Rents, City of Fredericksburg, 2006-2010**

Home Value	Percentage of Housing Stock	Monthly Rent	Percentage of Rental Units
\$0 to \$99,999	5.5%	Less than \$200	1.4%
\$100,000 to \$149,999	2.8%	\$200 to \$499	5.5%
\$150,000 to \$199,999	8.7%	\$500 to \$749	10.5%
\$200,000 to \$299,999	22.1%	\$750 to \$999	27.8%
\$300,000 to \$499,999	44.5%	\$1,000 to \$1,499	46.6%
\$500,000 or more	16.4%	\$1,500 or more	8.2%
Median	\$335,800	Median	\$1,030

Source: 2006-2010 American Community Survey 5-Year Estimates

As noted above, the median home value in Fredericksburg is \$355,800. Only approximately 9 percent of homes are valued at less than \$150,000. The highest percentage (46.6 percent) of monthly rental rates is between \$1,000 and \$1,499 per month, with Fredericksburg's median monthly rent costing \$1,030. Home values in Fredericksburg are higher than in Culpeper, Richmond, and Spotsylvania County. Exhibit II-22 below displays median home values and rents for Fredericksburg and the given surrounding areas based on the 2006-2010 ACS 5-Year Estimates.

Exhibit II-22

Median Home Values and Rent, City of Fredericksburg and Surrounding Areas, 2006-2010

Jurisdiction	Median Home Value	Median Gross Monthly Rent
Fredericksburg	\$355,800	\$1,030
Culpeper	\$309,000	\$963
Manassas	\$325,800	\$1,232
Richmond	\$201,800	\$805
Spotsylvania County	\$305,000	\$1,178
Stafford County	\$355,300	\$1,280

Source: 2006-2010 American Community Survey 5-Year Estimates

Age of housing stock. The Exhibit II-23 below identifies the number of housing units by the year in which they were built. Per the 2006-2010 American Community Survey data, nearly fifty percent of housing units are over fifty years old in Fredericksburg. The highest percentage of units was built during the 1970s. The median year for owner-occupied built structures is 1963, versus 1975 for renter-occupied units. The overall median year built for all housing units is 1972.

Exhibit II-23**Number and Percent of Housing Units by Year, City of Fredericksburg, 2006-2010**

Construction Year	Estimate	Percent
Built 1939 or earlier	1,630	16%
Built 1940 to 1949	441	4%
Built 1950 to 1959	1,073	11%
Built 1960 to 1969	1,569	15%
Built 1970 to 1979	2,054	20%
Built 1980 to 1989	1,306	13%
Built 1990 to 1999	729	7%
Built 2000 to 2004	673	7%
Built 2005 or later	692	7%
Total	10,167	100%

Source: 2006-2010 American Community Survey 5-Year Estimates

Housing units in severely substandard condition. The following Exhibit II-24 outlines the number and percent of Fredericksburg housing units without complete plumbing or kitchen facilities from 2006-2010, as well as units with no telephone service available.

Exhibit II-24**Substandard Living Conditions, City of Fredericksburg, 2006-2010**

Condition	Number of Units	Percent
Total number of occupied-units	9,206	100%
Lacking complete plumbing	72	0.8%
Lacking complete kitchen	57	0.6%
No telephone service available	361	3.9%

Source: 2006-2010 American Community Survey 5-Year Estimates

As shown above, only 0.8 percent and 0.6 percent of occupied units were without complete plumbing and kitchen facilities respectively. The American Community Survey also estimates sources of heating fuel for all Fredericksburg housing units. From 2006-2010, 1,213 Fredericksburg housing units used either nontraditional sources of heat (kerosene, wood, coal, or other) or had no source of heat at all.

Subsidized housing units. There is no local public housing authority in Fredericksburg. The Virginia Housing Development Authority (VHDA) administers vouchers in areas of Virginia that do not have a local housing authority or housing agency. The VHDA Voucher Program is primarily in the suburbs and rural areas of Virginia and generally not in the metropolitan areas of the state. VHDA subcontracts with local agencies (administrative agents or agencies), which run the day-to-day operations under the authority's direction. The Central Virginia Housing Coalition administers the vouchers for the City of Fredericksburg and the surrounding counties.

Subsidized housing for low-income populations is provided by both public and nonprofit organizations. The type of assistance varies from units owned by the Central Virginia Housing Coalition and units subsidized with Section 8 vouchers to units built using low-income housing tax credits (LIHTC) or other subsidies. Including tax credit and vouchers, there are 1,828 subsidized units in the City. This number represents 17.5 percent of the total housing units and 31.1 percent of available rental units. The following Exhibit II-25 shows the vouchers and properties that offer a subsidized rental rate.

Exhibit II-25**Subsidized Housing Units, City of Fredericksburg, May 2012**

Location	Type of Subsidy	Number of Units
HCV Fredericksburg City	HCV	240
HCV Virginia Housing Development Authority Port Out	HCV	14
Colonial Heights	LIHTC	14
Crestview	LIHTC	180
River Woods Apartments	LIHTC	68
Fall Hill Apartments	LIHTC	246
Riverside Manor	LIHTC	142
Townsend Square Apartments	LIHTC	200
Forest Village Apartments (portion)	LIHTC	71
Forest Village Apartments (portion)	LMSA	121
Hazel Hill Apartments	LIHTC/LMSA	145
Heritage Park I	LIHTC/LMSA	63
Heritage Park II	LIHTC/LMSA	65
Mill Park Terrace	HFDA/8 NC	129
Madonna House	LIHTC	130
Total		1,828

Source: Central Virginia Housing Coalition, U.S. Department of Housing & Urban Development, Virginia Housing Development Authority, and Individual Residential Property Managers

Note: HCV = Housing Choice Voucher Program; LIHTC = Low Income Housing Tax Credits; LMSA = Loan Management Set-Aside Program; HFDA/8 NC = Section 8 new construction properties financed or insured through State Housing Finance Agencies; PRAC/811 = Project Rental Assistance Project for people with disabilities; and 202/8 NC = Section 8 New Construction for the elderly

Section III.

Citizen and Key Person Feedback

This section of the AI summarizes the results of 225 completed telephone surveys, 26 survey responses from the Thurman Brisben Center, and 15 key person interviews. Three public forums were conducted on March 29, 2012 at the Bragg Hill Family Life Center, March 31, 2012 at the Mayfield Civic Association, and April 2, 2012 at the Thurman Brisben Center. These events served as part of the public outreach process for the City of Fredericksburg's AI.

While responses were not obtained from every person who attended the public forums, the forums allowed for vibrant discussion of Fair Housing. Just fewer than 50 residents were in attendance at the Mayfield Civic Association, many of whom engaged in one on one discussion with the study team. The findings from these activities are discussed in turn.

Telephone Survey

Beginning in February 2012, the team conducted a telephone survey of 225 Fredericksburg residents. Due to reluctance by participants to complete a telephone survey, the team was unable to obtain the desired 475 survey responses, which was the initial goal. The survey asked respondents about their personal and housing characteristics, experience with housing discrimination, and their knowledge of fair housing issues, where to learn more about fair housing, their awareness and utilization of Fredericksburg's housing assistance and social service programs, and their opinions about housing and social service needs in the City. Surveys were conducted in English only.

Survey respondent characteristics. Respondents were contacted by means of random selection of 22401 zip code addresses listed in the public telephone book. There are both similarities and differences between respondents' characteristics and data obtained on Fredericksburg residents from the 2010 United States Census and the 2008-2010 American Community Survey 3-year-estimates.

The responses from the Thurman Brisben Center were compiled with the telephone survey responses, except for in the tenure, educational attainment, and household income categories.

Tenure. As shown in Exhibit III-1, 76 percent of survey respondents were homeowners, which is higher than the 38 percent of housing units that were owner-occupied in Fredericksburg according to the 2010 Census. Twenty-four percent of survey respondents were renters, compared to 62 percent of housing units that were renter-occupied in Fredericksburg in 2010. The reason for this may be that renters do not always have land-based telephone lines, and therefore are not listed in the public telephone book.

Exhibit III-1
Tenure of Survey Respondents and Residents, City of Fredericksburg

Respondents	Telephone Survey		Fredericksburg Citizens, 2010	
Owner	171	76%	3,623	38%
Renter	54	24%	5,882	62%
Total	225	100%	9,505	100%

Source: Fredericksburg Telephone Survey, February-April 2012, 2010 U.S. Census

Additionally, 26 respondents from the Thurman Brisben Center identified themselves as homeless and currently residing at the shelter; therefore these participants do not occupy or rent a dwelling.

Age. Survey respondents had to be at least 18 years of age to participate in the survey. Ages ranged from 21 to 92 years. People in the age cohorts 55-64 and 65 and older were most likely to participate in the survey. A much lower percentage of persons ages 18 to 24 responded to the survey (6 percent) than are represented in the population for the City (30 percent). Eight people refused to answer this question.

Exhibit III-2
Age Distribution of Survey Respondents and Residents, City of Fredericksburg

Respondents	Telephone Survey		Fredericksburg Citizens, 2010	
18 to 24 years	15	6%	5,649	30%
25 to 34 years	33	14%	3,808	19%
35 to 44 years	45	18%	2,732	14%
45 to 54 years	36	15%	2,753	14%
55 to 64 years	50	21%	2,215	11%
65 and older	64	26%	2,413	12%
Total	243	100%	19,570	100%

Source: Fredericksburg Telephone Survey, February-April 2012, 2010 U.S. Census

Education. Five percent of survey respondents' educational attainment includes some high school or less, compared to 13.4 percent of Fredericksburg residents based on the 2008-2010 American Community Survey 3-year-estimates. These estimates include the population over 25 in Fredericksburg, whereas the survey respondents begin at age 21.

Exhibit III-3

Educational Attainment of Survey Respondents and Residents, City of Fredericksburg

Education	Telephone Survey		Thurman Brisben Center		Fredericksburg Citizens, 2008-2010	
	Count	Percentage	Count	Percentage	Count	Percentage
Some high school or less	11	5%	5	19%	1,785	13%
High school graduate/G.E.D.	54	24%	15	58%	4,008	30%
Trade/Vocational school/Some college	40	18%	4	15%	3,247	25%
College graduate	71	31%	2	8%	2,462	19%
Post-graduate work or degree	49	22%	0	0%	1,775	13%
Total	225	100%	26	100%	13,277	100%

Source: Fredericksburg Telephone Survey, February-April 2012, Thurman Brisben Center Responses, 2008-2010 American Community Survey 3-year Estimates

Race and ethnicity. The majority of survey respondents (72 percent) responded that they were Anglo/White and 19 percent responded that they were African American/Black. The 2010 U.S. Census reported that 64 percent of Fredericksburg residents were Anglo/White and 22 percent were African American/Black. Exhibit III-4 displays the racial and ethnic distribution of survey respondents and residents of Fredericksburg, including the amount of respondents and residents who identify themselves as Hispanic/Chicano/Latino (of any race).

Exhibit III-4**Race and Ethnicity of Survey Respondents and Residents, City of Fredericksburg**

Race and Ethnicity	Telephone Survey and Thurman Brisben Center		Fredericksburg Citizens, 2010	
Anglo/White	178	72%	15,596	64%
African American/Black	45	19%	5,498	22%
American Indian/Native American	1	0%	100	0%
Asian/Oriental/Pacific Islander	4	2%	706	3%
Two or more Races	6	2%	949	4%
Other	3	1%	1,437	6%
Hispanic/Chicano/Latino (of any race)	9	4%	2,402	11%
Total	246	100%	24,286	100%

Source: Fredericksburg Telephone Survey, February-April 2012, Thurman Brisben Center Responses, 2010 U.S. Census

Household income. Of the 225 survey respondents, 51 refused to answer the question about their household income. This means that 23 percent of the respondents were unaccounted for in the following summary. Of the 174 respondents who did answer this question, 18 percent of households earned over \$150,000 a year, compared to six percent of households in Fredericksburg overall. Twenty-eight percent of respondents' households earned less than \$35,000, compared to 41 percent of all Fredericksburg households. Conversely, 72 percent of respondents' households earned over \$35,000 a year, versus 59 percent of all Fredericksburg households. Exhibit III-5 displays the income distribution of survey respondents.

Responses collected from the Thurman Brisben Center are included in the following Exhibit, but are not combined with the telephone survey responses. Seventy-three percent of residents at the Thurman Brisben Center earn less than \$10,000 a year and none of the respondents earned over \$49,000 a year.

Exhibit III-5
Housing Income of Survey Respondents and Residents, City of Fredericksburg

Income	Telephone Survey		Thurman Brisben Center		Fredericksburg Citizens, 2010	
Less than \$10,000	10	6%	19	73%	1,109	12%
\$10,000 to \$19,999	8	5%	2	8%	1,010	11%
\$20,000 to \$29,999	13	7%	2	8%	1,349	14%
\$30,000 to \$34,999	18	10%	1	3%	418	4%
\$35,000 to \$49,999	25	14%	2	8%	1,681	18%
\$50,000 to \$74,999	18	10%	0	0%	1,543	16%
\$75,000 to \$99,999	24	14%	0	0%	808	8%
\$100,000 to \$149,999	28	16%	0	0%	1,075	11%
\$150,000 or more	30	18%	0	0%	537	6%
Total	174	100%	26	100%	9,530	100%

Source: Fredericksburg Telephone Survey, February-April 2012, Thurman Brisben Center Responses, 2008-2010 American Community Survey 3-Year Estimates

Household characteristics. Exhibit III-6 shows the household characteristics of the survey respondents. The majority of respondents were married, and only two percent identified themselves as domestic partners. Twenty-eight respondents refused to answer the question pertaining to how many residents lived within the household. Of the respondents, 42 percent of respondents' households were occupied by two persons.

Fifty-five people either lived alone, or refused to answer the question pertaining to children under the age of 18 living in his or her household. Thirty-five percent of the respondents who did answer this question did not have children under the age of 18 living in his or her household.

Exhibit III-6
Household Characteristics of Survey Respondents, City of Fredericksburg

Response Choices	Percentage of Respondents
Married	60%
Single	25%
Domestic partners	2%
Divorced	8%
Widowed	5%
Total	251
1 person	21%
2 persons	42%
3 to 4 persons	27%
5 or more persons	10%
Total	223
Do not have children under 18 years	35%
Have children under 18 years	65%
Total	196

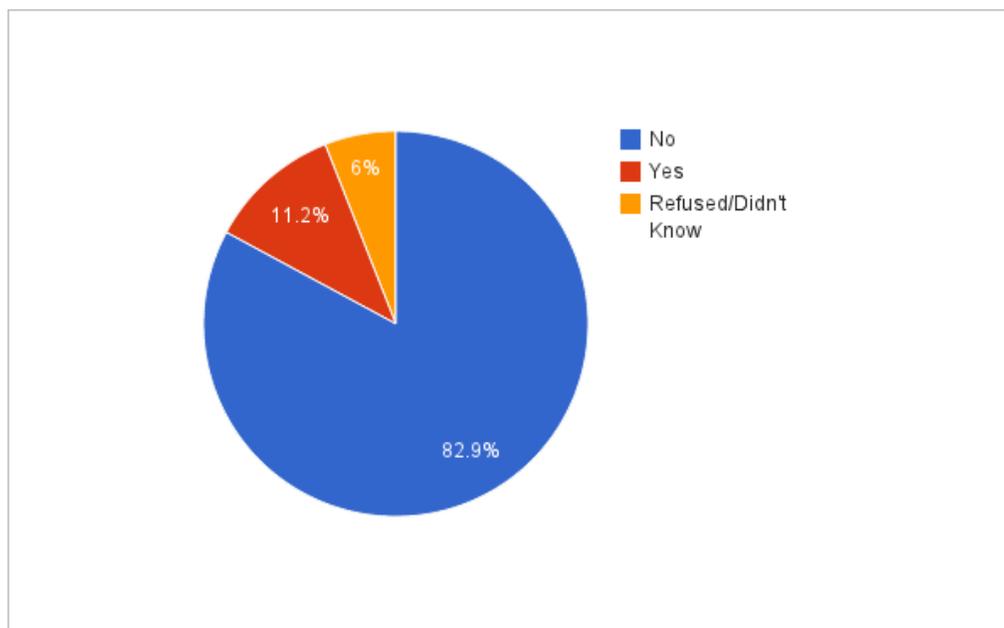
Source: Fredericksburg Telephone Survey, February-April 2012

Experience with housing discrimination. The survey asked respondents a number of questions about their experience with housing discrimination and the experiences of persons they know.

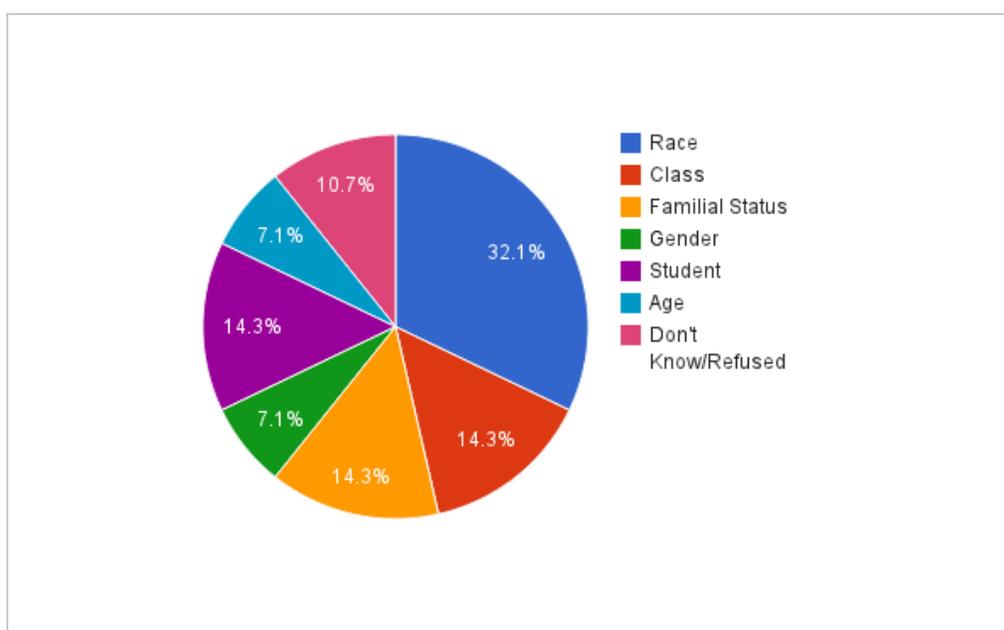
Approximately 11 percent of survey respondents (a total of 28) said they had experienced discrimination in trying to find house; 14 percent of survey respondents (a total of 35) said they knew someone who had experienced housing discrimination. If it is assumed that there is no overlap between the respondents who had experienced housing discrimination and the persons they knew who had experienced housing discrimination, the survey results suggest that approximately 25 percent of Fredericksburg citizens have experienced discrimination in trying to find housing.

Reasons for housing discrimination. Respondents who had experienced discrimination were asked why they thought they had been discriminated against. Thirty-two percent of respondents experiencing discrimination said it was race- and/or ethnicity-based. Another 14 percent replied they were discriminated against because they were poor or because of class background; however, income or a person's ability to pay is not a protected class under the Fair Housing Act. The reasons for discrimination reported by survey respondents are listed in Exhibit III-7.

Exhibit III-7
Survey Respondents' Experience with Housing Discrimination, City of Fredericksburg



Have you ever experienced housing discrimination?



What do you think was the reason you were discriminated against?

Source: Fredericksburg Telephone Survey, February-April 2012, includes Thurman Brisben Center respondents

Of the 28 people who indicated that they were discriminated against, there were 12 who said the discrimination occurred in Fredericksburg. Other respondents had experienced housing discrimination in other parts of the country, typically from years ago.

A demographic review of the respondents who said they had experienced housing discrimination did not reveal any strong trends in discrimination. Persons who were renters were more likely to say they had experienced housing discrimination than owners.

Resolving housing discrimination. Survey respondents were asked a series of questions to identify how they would respond if they encountered housing discrimination.

The 28 respondents who had experienced housing discrimination were asked what they did about the discrimination. As shown in Exhibit III-8 below, the vast majority of the respondents did “nothing.”

Exhibit III-8

What Did You Do About the Discrimination?, City of Fredericksburg

Actions Taken	Number of those who took action	Percent of discriminated population
Nothing	17	61%
Refused to buy/rent from those discriminating	5	18%
Filed a complaint	4	14%
Called local government	2	7%

Source: Fredericksburg Telephone Survey, February-April 2012

The survey asked specifically whom respondents would contact if they experienced housing discrimination. Twenty-nine percent of respondents did not know whom to contact if they wanted to report being discriminated against. Among the respondents who said they know who to contact, 25 percent mentioned contacting an attorney/legal aid/ACLU. Ten percent would contact the Mayor’s Office or City Council and 9 percent would contact the Fair Housing Authority.

Exhibit III-9
Whom Would You Contact If You Were Discriminated Against In Regards to Housing?,
City of Fredericksburg

	Responses	Percent
I don't know	72	29%
An attorney/legal aid/ACLU	63	25%
Mayor's Office/City Council	27	10%
Fair Housing Authority	22	9%
Central Virginia Housing Coalition	12	5%
Call/See Realtor	12	5%
HUD	10	4%
Better Business Bureau	9	4%
City Attorney's Office	9	3%
Community Organization	8	3%
Other	4	2%
People who discriminated/ someone above them	3	1%
Research who to contact	0	0%
Total	251	100%

Source: Fredericksburg Telephone Survey, February-April 2012

Responses in the “other” category included the following (responses are paraphrased to preserve confidentiality):

- “I would look for another place.”
- “I would contact a local newspaper.”
- “I would contact the police.”

Learning about fair housing rights. Respondents were also asked how they would get more information if they wanted to learn more about fair housing rights. The top two responses were to conduct an Internet search (44 percent of respondents) or that they did not know where to go (17 percent).

Exhibit III-10**How Would You Go About Obtaining Information About Your Fair Housing Rights?, City of Fredericksburg**

Response	Number	Percent
Internet search	110	44%
Don't know	42	17%
Local government information sources/officials	21	8%
Call a lawyer/ACLU/Legal Aid/Attorney General	17	7%
Call/see the city government/City Council	12	5%
HUD website	12	5%
Public housing authority	11	4%
Call/see a realtor	11	4%
Library	8	3%
Call the Central Virginia Housing Coalition	6	2%
TV	1	0%
Phone book/newspaper	0	0%
Other	0	0%
Total	251	100%

Source: Fredericksburg Telephone Survey, February-April 2012

Housing and social service needs. The survey also included several questions about the housing and social service needs of Fredericksburg residents. Thirty-nine respondents (29 percent of those who answered this question) said they had received social services or housing assistance.

Exhibit III-11

Have You Ever Received Social Services/Housing Assistance From These Agencies?, City of Fredericksburg

Agency	Percent Who Responded Yes
Social Service Agencies	
Department of Social Services	32%
Virginia Employment Commission	10%
Fredericksburg Area Food Bank	7%
disAbility Resource Center	5%
Rappahannock Area Community Services Board	3%
Rappahannock Agency on Aging	1%
Rappahannock Legal Services	0%
Rappahannock Council on Domestic Violence	0%
Other	0%
Housing Assistance Agency	
Section 8 Program	12%
Fredericksburg Office of Planning and Community Development	4%
Virginia Housing Program/Coalition/Development	4%
Rappahannock Area Community Services Board	3%
FHA-Federal Housing Administration	1%
Other	18%
Don't Know	0%

Source: Fredericksburg Telephone Survey, February-April 2012

Note: Allows for multiple answers

Awareness of social service organizations. Survey respondents were asked about their awareness of several social service organizations in Fredericksburg. Approximately 91 percent of respondents knew the Department of Social Services while only 43 percent of respondents were aware of the disAbility Resource Center. Exhibit III-12 displays the results for each social agency.

Exhibit III-12

Are You Aware of These Services/Organizations in Fredericksburg?

Agency	Percent Who Responded Yes
Department of Social Services	91%
Fredericksburg Area Food Bank	89%
Virginia Employment Commission	83%
Rappahannock Agency on Aging	75%
Rappahannock Council on Domestic Violence	71%
Rappahannock Area Community Services Board	71%
Rappahannock Legal Services	52%
disAbility Resource Center	43%

Source: Fredericksburg Telephone Survey, February-April 2012

Awareness of housing assistance. Survey respondents were asked about their awareness about various types of housing assistance available to Fredericksburg residents. Almost 65 percent were aware of low-income rental units, while only 17 percent were aware of emergency home repairs. Exhibit III-13 displays the survey responses.

Exhibit III-13

Are You Aware of These Housing Assistance Services in Fredericksburg?

Housing Assistance	Percent
Low-income rental units	65%
Emergency assistance with utility payments	56%
Section 8 rental assistance	54%
Elderly housing	45%
Housing for the disabled	41%
New home purchase	29%
Emergency assistance with rent or mortgage payments	25%
Home rehabilitation	22%
Emergency home repairs	17%

Source: Fredericksburg Telephone Survey, February-April 2012

Top needs. Respondents were asked for their opinions about the top social services and housing needs in Fredericksburg. The top three most needed social services included the food bank, youth services and employment services. Exhibit III-14 lists the responses to this question.

Exhibit III-14

What are the Most Needed Social Services in Fredericksburg?

Social Service	Responses	Percent
Food Bank	81	31%
Youth Services	50	19%
Employment Services	43	16%
Senior Services	22	8%
Domestic Violence Services	15	6%
Legal Services	14	5%
Disability Services	14	5%
Don't know or refused	27	10%
Total	266	100%

Source: Fredericksburg Telephone Survey, February-April 2012

Note: Allows for multiple answers.

Respondents were also asked to identify the most needed housing assistance services in Fredericksburg, as shown in Exhibit III-15. The top three most needed housing assistance services in Fredericksburg were homeless shelter/housing for the homeless, low income rental units, and more affordable housing.

Exhibit III-15

What are the Most Needed Housing Assistance Services in Fredericksburg?

Service	Responses	Percent
Homeless Shelter/housing for the homeless	61	18%
Low income rental units	48	14%
More Affordable Housing	39	11%
Elderly housing	30	9%
Section 8 Rental Assistance	32	9%
Housing for the Disabled	21	6%
New Home Purchase	19	6%
Emergency Assistance with Utility Payments	17	5%
Emergency Assistance with Rent/Mortgage Payments	17	5%
Home Rehabilitation	15	4%
Student Housing	15	4%
Emergency Home Repair	12	3%
Don't Know/Refused	22	6%
Total	348	100%

Source: Fredericksburg Telephone Survey, April-May 2012

Note: Allows for multiple answers

Key Person Interviews and Public Forum

During the months of March and April, the team conducted 15 key person interviews with individuals knowledgeable about fair housing issues and social service needs in the City of Fredericksburg. The team also held three public forums. The following Exhibit lists the organizations with which in-person and telephone interviews were conducted for the AI.

Exhibit III-16

Agencies and Organizations Consulted

BB&T Mortgage
City of Fredericksburg; Property Maintenance Code Official
City of Fredericksburg; Zoning Office
Department of Social Services
disAbility Resource Center
Fredericksburg Area Association of Realtors
Fredericksburg Area HIV/AIDS Support Services
Hope House
Micah Ecumenical Ministries
Rappahannock Legal Services, Inc.
Realty World Select
Thalhimer Sullivan Properties, LLC
Thurman Brisben Center
Top Choice Homes
University of Mary Washington; Residence Life and Commuter Student Services

Source: Auricchio and Gavigan

The key person interviews were conducted to obtain input on fair housing impediments. Interviewees and public forum participants mentioned several housing and community development needs/concerns the City should examine to improve fair housing and affordable housing. Their comments include the following:

Visible Issues

- Section 8 housing has a very long waiting list. This is a need for more vouchers and more turnover of vouchers. (6 responses)
- The most frequently mentioned issue in the community is the affordability and accessibility of housing. (10 responses)
 - Residents have been forced to move out of the City to afford a home and most commute to work everyday.

- People wish to stay in the City but cannot afford rent.
 - Affordable housing should be distributed across the City instead of just concentrated areas.
 - There is a higher buyer and renter demand than supply of available housing.
 - A person who earns minimum wage is unable to afford 99 percent of the housing units in the area.
 - Because most disabled persons live on a fixed income, as rent increases, there is much difficulty for the disabled to afford rent.
- Respondents expressed a concern for the lack of subsidized housing. (5 responses)
 - Several key persons and multiple citizens expressed a concern about gentrification; residents are displeased with their inability to move back into their neighborhoods as the character of some neighborhoods are changing.

Barriers

- Bad credit history and unemployment rates hinder a person's ability to rent. (3 responses)
- Lack of or poor rental histories discourage landlords to rent to certain persons. (2 responses)
- Because constituents do not support affordable housing projects, local officials do not always support them. (2 responses)
 - There is a "Not In My Backyard" (NIMBY-ism) reaction in the community.
 - While homelessness is an issue that constituents recognize, nobody wants homeless shelter or housing in their neighborhood.
- Even when a criminal offense was minor and in the past, it may haunt a person and create an obstacle that many landlords do not wish to overlook. (4 responses)
- Restrictive zoning and few incentives for builders to build affordable housing. (3 responses)
 - Because affordable housing is limited, there is a higher demand than availability.
 - In order to increase density, zoning must be more flexible.
 - The City should provide more incentives for builders to be able to address the housing needs of lower income residents.

Discrimination

- Most interviewees responded that they did not know of specific incidences of housing discrimination in Fredericksburg. (10 responses)
- Three instances of known discrimination were mentioned. They included people not being able to rent or buy due to:
 1. Criminal history, which is not a protected class under the FHA.
 2. Landlords refusing to rent to people currently living in a homeless shelter.
 3. Residents having been denied or removed from housing due to HIV status.

Predatory lending

- Respondents voiced concerns for high interest rates on loans. Because borrowers are unable to pay off the loan, their credit is ruined. (4 responses)
 - Education is necessary so people know what they are getting themselves into with these loans.

Needs

- There is a dire need for more Section 8 vouchers and there needs to be higher turnover rate. (5 responses)
- Education is necessary to inform the community how it can help the homeless population. (3 response)
- Assistance is needed for elderly or disabled person with low income, Medicaid eligible people.
 - Most people are unaware of how difficult it is to be disabled.
 - More ramps and more handicapped bathrooms are needed throughout the community.
- Increase the supply of housing units available so that housing prices may be reduced. (2 responses)
- A public housing authority is needed to promote fairness. (3 responses)
 - A rental housing inspection program.
 - There is a need for more transitional housing programs.

- Student housing/off campus living for students at the University of Mary Washington can eliminate some of the tension between residents and students.

If unlimited funding were available

- There is a large need for subsidized housing, particularly for those with disabilities, who survive on SSI or SSDI. (5 responses)
 - Help people who cannot pay for first-month's rent, an application fee, or utility deposit.
 - Build additional group homes and apartment complexes to help mentally disabled persons.
- Build more affordable/free day-care centers. There are many single mothers who need to work but are unable to because they do not have a place to care for their children during the day. Without work, they cannot afford rent, and many become homeless.
- Project-based single room occupancy for homeless individuals. (4 responses)
 - Keeping complexes in good repair.
 - Funding for supportive services that help people obtain and maintain housing.
- Workforce housing for firefighters, teachers, etc.
- Increased education to enhance community support for programs like Rapid Rehousing and other social and housing services.

Summary of Responses

The results of the key person interviews and public forum confirm that there is a great need for more affordable housing units within the City and surrounding areas, particularly to accommodate households with low- to very-low incomes. Many of the needs identified by respondents are beyond the control of the City, such as the number of available Section 8 vouchers, instances of housing discrimination for characteristics not covered under Fair Housing, poor rental or criminal histories, and high interest rates. Other issues are already being addressed with City supported programs that provide security deposits and first month's rent (CDBG supported Lend-A-Hand program), installation of ramps and other features in homes to promote independence (CDBG supported Removal of Architectural Barriers Program), funding of legal services to protect people against cases of fair housing discrimination (CDBG supported Rappahannock Legal Aid services), and allowances for a variety of dwelling types within residential zoning districts. The City should continue with its existing programs and consider new ways to encourage affordable housing within new developments, direct people to existing

educational programs offered by the Central Virginia Housing Coalition regarding homeownership and lending, and work within the Fredericksburg Regional Continuum of Care network to obtain new services to support free day care, increased wages/employment, and the availability of new affordable housing units in the region.

SECTION IV.

Lending, Complaint, and Legal Review

This section contains an analysis of fair housing complaint data and legal cases concerning the Federal Fair Housing Act and the Virginia Fair Housing Law.

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. A review of CRA ratings from 1991-2012 revealed that all twelve of the Fredericksburg banks listed on the CRA website (www.ffiec.gov/cra) received outstanding or satisfactory CRA ratings. Further, the review of 2012 CRA data showed that the City was not listed as a distressed or underserved CRA tract.

Home Mortgage Disclosure Act (HMDA) data analyzes home purchases, mortgage applications, and refinance applications by location of loan origination. Statistics on HMDA are costly and were unattainable by the team, but is considered less relevant due to the presence of online banking.

As part of the AI, organizations were contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Fredericksburg. Information was received from HUD and Rappahannock Legal Services. Countless additional attempts to receive data from other organizations/agencies were unsuccessful.

Fair Housing Complaint Process and Data

Citizens of Fredericksburg who believe they have experienced discrimination may report their complaints to the following entities: HUD's Office of Fair Housing and Equal Opportunity (FHEO), the Virginia Fair Housing Office (under the auspices of the Virginia Department of Professional and Occupational Regulation), and Rappahannock Legal Services. If a person has been experienced illegal housing discrimination, they have 180 days to file a complaint.

Virginia Fair Housing Office. The Virginia Fair Housing Office (VFHO) consists of an administrator, who has overall responsibility for the office; an Investigative Supervisor, who oversees all investigations; a Program Conciliator, who attempts to resolve complaints through informal negotiation; four field investigators and two administrative investigators.

The VFHO is the investigative arm of Virginia's Fair Housing Board and Real Estate Board. The Fair Housing Board administers and enforces the Fair Housing Law for most individuals and businesses; the Real Estate Board retains jurisdiction over real estate licensees and their

employees. Both boards meet in Richmond, at the Department of Professional and Occupational Regulation. Their meetings are open to the public.

The VFHO investigates allegations of housing discrimination under Virginia's Fair Housing Law. Anyone who believes they have been discriminated against in housing may file a complaint with the VFHO. Once the Fair Housing Office accepts a complaint for investigation, the complaint is assigned to an investigator. An investigator generally interviews the complainant, the respondent, and relevant witnesses. The investigator may also review documents and records. During the investigative process, a trained professional from the Alternative Dispute Resolution Section coordinates the conciliation process. Conciliation is a voluntary process in which the parties attempt to resolve the complaint by agreeing to mutually acceptable terms. If conciliation is successful, the investigation will be suspended. If conciliation is unsuccessful and if it appears that discrimination occurred, the Fair Housing Office will present the evidence obtained during its investigation to the Real Estate Board. Generally, after reviewing the evidence, the Real Estate Board dismisses the complaint, accepts the conciliation agreement, or issues a charge of discrimination against the respondents. If the Board issues a charge, it will immediately refer the case to the Attorney General's Office.

The VFHO has been certified by HUD as a substantially equivalent agency. As a result, HUD refers most of the Fair Housing complaints that it receives from Virginia residents to the VFHO.

HUD. Housing discrimination complaints filed with HUD may be done online at (<http://www.hud.gov/complaints/housediscrim.cfm>), toll free at 1-800-669-9777, or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C. or Virginia's Fair Housing Hub located in Philadelphia, Pennsylvania.

When HUD receives a complaint, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and the public interest. If an agreement is signed, HUD will take no further action unless the agreement is breached, in which case HUD will recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. The agency must begin work on the complaint within 30 days or HUD may take it back. If, during the investigative, review and legal process, HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days,

unless either party prefers the case be heard in Federal district court. Virginia does have substantial equivalency of the Federal Fair Housing Act.

City of Fredericksburg. When the City of Fredericksburg receives a fair housing complaint, the complainant is referred to Rappahannock Legal Services (RLS). The City of Fredericksburg has contracted with RLS to conduct education, outreach and enforcement of fair housing issues to the citizens of Fredericksburg.

Rappahannock Legal Services (RLS) is a non-profit corporation that provides free legal services in non-fee-generating civil matters to those who cannot afford an attorney. RLS is funded by the federal, state, and local governments and by a wide range of local individuals, agencies, and organizations. RLS has three offices located in Fredericksburg, Culpeper, and Tappahannock with 12 full-time and 3 part-time staff.

RLS provides legal services concerning consumer problems, administrative matters, housing problems and domestic concerns. Typical calls and inquiries concern landlord/tenant issues, subsidized housing, foreclosures, and housing discrimination.

For the fiscal year ending June 30, 2012, RLS represented 19 Fredericksburg households which included 39 persons in housing related legal matters. Services provided ranged from counsel and advice to full representation in court and administrative hearings for foreclosures, evictions, and utility shut-offs. Monetary benefits awarded to clients during Fiscal Year 2011-2012 totaled \$39,594.80. Claims avoided amounted to \$24,842.90. Total benefits awarded and claims avoided amounted to \$64,437.70.

Rappahannock Legal Services inventoried its case load from July 1, 2007 to June 30, 2012, and determined that no fair housing discrimination cases were identified. Over the last five years, RLS has not found many discrimination cases in general, and in the City of Fredericksburg, there simply have been no cases presenting themselves to the agency through its normal intake process that involve a discrimination issue. This is likely because discrimination is not as blatant as it had been in previous years or that the discrimination is also tied to a legitimate housing violation by the tenant.

Other legal services in the State of Virginia include the Virginia Poverty Law Center, Legal Services Corporations of Virginia, Legal Services of Northern Virginia, and Virginia Legal Aid.

Fair housing complaints filed with HUD were obtained from HUD's Philadelphia Regional Office of Fair Housing and Equal Opportunity (FHEO). The number of housing discrimination complaints filed from January 1, 2007 - January 1, 2012 in the City of Fredericksburg is shown the following figures.

Exhibit IV-1**Number of Complaints Filed with HUD, City of Fredericksburg, 2007 to January 1, 2012**

Year filed	Number of complaints
2007	2
2008	0
2009	3
2010	1
2011	2
Total	8

Source: HUD's Philadelphia Regional Office of Fair Housing and Equal Opportunity

Exhibit IV-2 shows the basis of the discrimination that was alleged in the complaints. For the City of Fredericksburg, race was the primary cause for complaints. Familial status and disability were the next most common reasons for complaints. HUD provides data on complaints made at the national level, which can be accessed by searching Enforcement Activity on (HUD.GOV). These data are compiled by the basis of the complaint, as well as the year in which the complaint was made. Nationally, the largest majority of complaints are made on the basis of disability and race.

Exhibit IV-2**Basis of Complaints Filed to HUD, City of Fredericksburg, 2007 to January 1, 2012**

Date filed	On the basis of
01/08/07	Disability
01/31/07	Disability
08/12/09	Race
09/11/09	Familial Status
12/14/09	Race
06/08/10	Race
06/16/11	Race
09/29/11	Familial Status

Source: HUD's Philadelphia Regional Office of Fair Housing and Equal Opportunity

Exhibit IV-3 shows how the HUD complaints were closed. Four of the eight HUD complaints closed showed “no cause,” another two conciliated or settled, one with cause (FHAP), and one with administrative closure. It should be noted that “no cause determination” does not necessarily mean that fair housing problems did not exist in the case; rather, it indicates that the case did not contain enough evidence to move forward.

Exhibit IV-3**How HUD Complaints were Closed, City of Fredericksburg, 2007 to January 1, 2012**

How closed	Number of complaints closed by HUD
No cause	4
Conciliated/settled	2
Cause (FHAP)	1
Administrative closure	1
Total	8

Source: HUD's Richmond Office of Fair Housing and Equal Opportunity

Exhibit IV-4 shows how the complaints filed to HUD were closed by the basis of the discrimination and then provides the issues related to the complaint.

Exhibit IV-4

How Complaints were Closed by Basis and Issues of Complaint, City of Fredericksburg, 2007 to January 1, 2012

Conciliated/Settled

Disability

Failure to make reasonable accommodation

Failure to make reasonable accommodation

No Cause

Race

Discriminatory refusal to sell

Discrimination in the making of loans

Discriminatory refusal to rent

Discrimination in terms/conditions/privileges to rental

Familial status

Discrimination in the services and facilities relating to rental

Cause (FHAP)

Familial status

Discriminatory refusal to rent

Discriminatory advertisement – rental

Administrative Closure

Race

Discriminatory refusal to rent

Note: More than one reason can be filed with a complaint.

Legal Analysis

As part of the fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues and trends in Virginia. Consultation with Rappahannock Legal Services and a search of the Department of Justice website, the National Fair Housing Advocate case database, and the Virginia Attorney General's Office yielded no cases filed in Fredericksburg from 2007 to January 1, 2012.

Section V.

Public Sector Review

This section examines a review of the public sector policies and practices regarding fair housing and barriers to affordable housing development in Fredericksburg. It contains the results of interviews conducted with stakeholders and a review of zoning and land use codes and City policies associated with fair housing and housing development. It also contains a review of the policies and procedures of the Central Virginia Housing Coalition and interviews with its members.

Public Housing Authority Policies

There is no local public housing authority in Fredericksburg.

The Virginia Housing Development Authority (VDHA) administers vouchers in areas of Virginia that do not have a local housing authority or housing agency. VHDA subcontracts with 42 local agencies (administrative agents or agencies), which run the day-to-day operations under the authority's direction. The Central Virginia Housing Coalition administers the vouchers for the City of Fredericksburg and its surrounding jurisdictions.

The Central Virginia Housing Coalition is a 501(3) non-profit, charitable organization established in 1988 that addresses housing issues in Planning District 16, which encompasses the City of Fredericksburg and Spotsylvania, Stafford, King George, and Caroline Counties. CVHC serves individuals and families of low- to moderate-income, and one third of the CVHC Board of Directors live in low-income areas or qualify as low- to moderate-income wage earners.

CVHC offers educational activities, homeownership programs, and rental programs. The educational activities include Housing/Rental Counseling; VHDA Homeownership Education; Go For Home!, which are workshops that help prepare families for the responsibilities of homeownership; and Virginia Individual Development Accounts Program. CVHC's homeownership programs include a low-interest home loan program through the VHDA, down payment assistance using Department of Housing and Community Development HOME funds, Neighborhood Stabilization Program in partnership with the City of Fredericksburg, and Sponsoring Partnerships and Revitalizing Communities program (SPARC). CVHC partners with local businesses to build and sell single-family homes to qualified applicants at below- market prices through the SPARC program; and the Indoor Plumbing & Rehabilitation programs allows families without indoor plumbing to access low cost repairs and/or installations. CVHC's rental programs include: the Housing Choice Voucher Program; Lend-A-Hand (funded partially by the City of Fredericksburg), and emergency assistance for rent or mortgage payments. CVHC also

owns and manages Colonial Heights Apartments, a 14 unit complex in the City of Fredericksburg.

CVHC also provides the Housing Choice Voucher Homeownership Program. This program was developed with VHDA to convert rental voucher holders into homeowners for the counties of Caroline, King George, Spotsylvania, Stafford, and Fauquier and the City of Fredericksburg. CVHC provides the same network/assistance of the voucher program for one half of the loan term and works to help owners achieve self sufficiency without the voucher during the last half of the loan term. CVHC continues to provide extensive counseling, education, credit, and homeownership responsibility workshops for these first-time homebuyers.

CVHC administers the Housing Choice Voucher program, also known as Section 8 vouchers, for the Planning District, which includes the City of Fredericksburg. In 2010, CVHC administered 1,047 rental assistance vouchers. Of those vouchers, 207 assisted families in Fredericksburg, with an additional 26 vouchers given to the Rappahannock Area Community Services Board to provide housing subsidies for their clients. There are no unused vouchers and a waiting list of 310 people. Currently, CVHC's waiting list for rental vouchers is closed in Fredericksburg and in the counties of Caroline, King George, Stafford, Spotsylvania, and Fauquier.

Zoning and Land Use

The team reviewed the City of Fredericksburg's codes, Comprehensive Plan, planning fees and other City programs and policies, to assess potential fair housing concerns or opportunities resulting from the development process. This review did not identify any fair housing problems.

The City Code of Ordinances governs the City of Fredericksburg. The City Council has full and complete powers to pass any ordinances not expressly prohibited by state law for planning, zoning, site plans, subdivisions, and preservation of historic and archeological resources. The City's day-to-day operations are handled by the City Manager, who is appointed by the Council, and his staff.

There are several boards, commissions, and authorities to assist the Council with this job. The Planning Commission, the Board of Zoning Appeals, the Building Code Appeals Board, and the Housing Advisory Committee are discussed further in this section.

City Council 2011-2012 goals and initiatives. The City Council routinely develops long term goals and initiatives. In the FY2011-2012 Goals and Initiatives, Goal 2 is titled, "Character of the City and Neighborhoods" and discusses developing a program to pursue an aggressive abatement of blighted properties. The Council appropriated \$30,000 in FY2011 to survey and evaluate all vacant and abandoned buildings.

There was nothing in this document about the promotion of fair housing or the maintenance of affordable housing.

Consolidated Plan. The 2010 Consolidated Plan for the City of Fredericksburg displays how Fredericksburg intends to invest federal funds received from the Community Development Block Grant (CDBG) program. The areas examined are:

- Housing Needs
- Homeless Needs
- Analysis of the Existing Housing Market
- A Five Year Strategic Plan
- Community Development Priorities

Federal formula grants, such as CDBG, address three broad goals. These commitments include 1) decent housing, 2) a suitable living environment, and 3) expanded economic opportunities. Decent housing encompasses retention and provision of affordable housing as well as prevention of homelessness. A suitable living environment is defined as improving the safety and livability of neighborhoods and increasing their access to the community as a whole. Expanded economic opportunities include improvements to the economic viability of the locality and the creation and retention of jobs.

The eligibility threshold for such programs is defined by HUD as persons and families whose household income is 80 percent or less of the area median income. Using HUD criteria, the total number of Fredericksburg households that meet income eligibility requirements is 5,540, or 64.72 percent of the City's households. This figure includes the following income categories:

- Extremely low-income – 30 percent of area median income or below – 2,130 households
- Low-income – between 30 and 50 percent of area median income – 1,755 households
- Moderate-income – between 50 and 80 percent of area median income – 1,655 households

The City of Fredericksburg is included in the Washington D.C. Metropolitan Area, which raises the median income benchmark allowing more City residents to qualify for HUD programs locally. Updated 2009 Census data indicates that there are 8,560 households in Fredericksburg.

Zoning, Planning and Development. The Code of Virginia provides enabling legislation to encourage local governments to improve public health, safety, convenience and welfare of its citizens, and to plan for the future development of communities.

The Planning and Community Development Department directs the overall and ongoing comprehensive land use planning and development process for the City. The Department provides direct staff support to a number of boards and commissions, including the Board of Zoning Appeals and the Planning Commission. The Department processes all land use and development applications through the City's Planning Commission. Applications requiring staff review and evaluation, and Planning Commission action include all rezoning requests, Special Use Permits, site plans, and subdivision plat and plans.

The Planning Commission consists of seven members who are appointed by the City Council. The Planning Commission is tasked with advising and assisting the City Council on all matters related to growth and development in the City. The Planning Commission meets twice each month to conduct a public hearing and to consider applications for Special Use Permits, Site Plans, Subdivisions, Rezoning, and Zoning Text Amendments. An important duty of the Commission is to formulate, approve and periodically update a long-term city plan to guide the development of the City. The Commission then recommends to the Council that the City adopt or amend the approved plan.

The Board of Zoning Appeals (BZA) consists of five residents who are appointed to the Circuit Court of the City. The BZA holds public hearings and considers applications for variances.

The Housing Advisory Committee consists of three voting members appointed by the City Council. The City Community Development Planner is a fourth ex officio member and does not have the power to vote. The Committee's purpose is to perform oversight for the housing rehabilitation loan program and other CDBG activities.

Comprehensive Plan. The Commonwealth of Virginia requires the local governing body to adopt a comprehensive land use plan. The Comprehensive Plan is the City's official guide for its future development. This Plan is general and long-range in nature, providing a view of the community's past development as well as how it can develop over the next 15 to 20 years. The Comprehensive Plan ensures public decisions are made in accordance with adopted policies and objectives, and it serves as the City's blueprint to create an increasingly better, more healthful, convenient, safe, and attractive community through intelligent foresight, administration, and coordination.

The 2007 Comprehensive Plan for the City of Fredericksburg is framed around:

- Land Use Patterns
- Historic Preservation
- Downtown
- Transportation and Mobility
- Rappahannock River
- Neighborhoods
- Housing
- Environmental Protection/Sustainability
- Public Facilities and Services
- Institutional Partnerships
- Community Appearance
- Corridors
- Suburban Business Districts

The Comprehensive Plan has a number of components that encourage and support fair housing and affordable housing development, including the following:

- **Mobility and Transportation.** According to the Comprehensive Plan, the top priorities to improve the existing transit system include:
 - Develop and implement a system for providing and maintaining crosswalks at every pedestrian path and street crossing, as well as at other strategic and appropriate midblock locations.
 - Work with FRED to significantly expand local bus service by extending the service area.
- **Neighborhoods.** Policy statements:
 - Preserve the character of the City's existing neighborhoods.
 - Enhance the quality of the City's residential neighborhoods to promote livability and a strong sense of community.
 - The residential areas of the City will comprise a collection of distinct and attractive neighborhoods, each possessing a unique sense of place and shared identity.
 - The residential neighborhoods will be adequately served with efficient transportation, parking, sidewalks, pathways, street trees, lighting, and other public facilities that are compatible with their neighborhood scale.
- **Housing.** The City of Fredericksburg seeks to ensure that all persons who live and/or work within its boundaries have the opportunity to obtain safe, sound, and sanitary housing within the City's neighborhoods and communities. Policy statements include:
 - All persons who live and work in Fredericksburg should have the opportunity to rent or purchase safe, decent, accessible, and affordable housing.

- Fredericksburg will provide a variety of housing opportunities throughout the City, both in terms of the housing type and the price of housing, that respect the existing character of the community.
- Homeownership in Fredericksburg should be encouraged and opportunities sought to increase homeownership.
- The City's housing stock will be maintained, protected, and expanded to ensure an adequate supply of housing for future generations.

In 1989, the City of Fredericksburg adopted a policy on affordable housing, which has been incorporated into the Comprehensive Plan. In the late 1980s, the City was experiencing an inadequate supply of moderately priced homes within the City. The City's original Affordable Housing Goal stated, "To provide safe, decent housing opportunities within the means of all persons who live and/or work in the City of Fredericksburg, Virginia."

Zoning. The City zoning ordinances are intended for the general purpose of promoting the health, safety and general welfare of the public. The zoning ordinances apply to all land and structures in the incorporated territory of the City. The City is divided into classes of zoning districts and the zoning district boundaries are indicated on the "Official Zoning Map of Fredericksburg, Virginia," which is adopted by the City Council.

Density and minimum site areas. An important component of zoning ordinance is the minimum site area requirement. Zoning ordinances should include zoning regulations and minimum site area requirements that are feasible for all types of developments. Overly large lot requirements may discourage or hinder affordable housing development.

According to the Fredericksburg zoning code, the City permits a density of new residential dwelling units of two to 30 dwelling units per acre. The zoning allows for a variety of single-family detached and attached units and multi-family units to be located in the City. The variety of dwelling types is appropriate for the urban environment. Exhibit V-1 summarizes the maximum number of dwelling units per acre, minimum square foot lot area requirements, and the minimum lot width for the various zoning districts in Fredericksburg.

Exhibit V-I
Density and Area Requirements for Residential Development, City of Fredericksburg

Zoning District	Maximum Density (dwelling unit/acre)	Minimum Lot Area (square feet)	Minimum Lot Width (feet)
Single-Family, detached (R-1, R-2)	2	15,000	Interior Site: 100 Corner Site: 125
Single-Family, detached (R-4)	4	8,400	Interior Site: 70 Corner Site: 95
Single-Family, detached (R-8)	8	5,000	Interior Site: 50 Corner Site: 70
Single-Family, attached (R-8)	8	1,600	18
Single-Family, detached & attached (R-12)	12	1,600	18
Multi-Family (R-12)	12	None	18
Planned Development-Residential (PD-R)	6	See GDP or R-8	See GDP or R-8
Single-Family, detached (PD-MU)	16	See GDP or R-8	See GDP or R-8
Single-Family, attached (PD-MU)	16	See GDP or R-8	See GDP or R-8
Multi-Family (PD-MU)	30	See GDP or R-12	See GDP or R-12
Single-Family, attached (C-D)	12	None	None
Multi-Family (C-D)	12	None	None
Mixed Use (C-D) (commercial use on ground floor)	1/1,800 sq ft No more than 24/acre	None	None
Single-Family (C-T)	8	20,000	100
Multi-Family (C-T)	8	20,000	100
Mixed Use (C-T) (commercial use on ground floor)	12	20,000	100

Source: Code of Ordinances, City of Fredericksburg, VA September 2012
GDP = Generalized Development Plan submitted with a rezoning request

The Zoning code also allows for a mixture of residential dwellings, commercial, office and services uses. The Planned Development-Residential (PD-R) and Planned Development Mixed-Use (PD-MU) districts were established to encourage innovative and creative design, to facilitate use of the most advantageous construction techniques, and to protect watercourses, stream valleys, forest cover in watersheds, and areas with scenic vistas. The districts were designed to permit a great degree of flexibility in terms of layout, design and construction of planned development.

Infill development. The City's older neighborhoods are a critical component of the City's identity and affordable housing stock. The trend in average house size growth from 1950 to 2000 is significant. The average house size in 1950 was 983 square feet. By the year 2000, the average house size increased to 2,265 square feet. During the process to update the 2007 Comprehensive Plan, character and construction/expansion of single family detached dwellings in a manner deemed to be out-of-scale with the surrounding neighborhood, was a well discussed topic. The discussion included infill construction on vacant lots, razing houses to building larger houses in their place, and large additions to existing houses.

To address this issue, the City of Fredericksburg responded by ensuring that teardowns are replaced with houses that are compatible with the neighborhood while accommodating modernization and additions to houses by addressing negative impacts or incompatibilities. Specifically, the City took action in 2011 to adjust setback regulations and lower building heights in the R-4 and R-8 zoning districts, while easing the zoning process for building approvals by expanding the provisions for averaging of setbacks of existing structures to determine the setbacks for new infill development. For sites of record on or before April 25, 1984, or sites in developed areas where yard geometry has already been established by existing structures and development patterns, the average of the existing front and side yard setbacks of the residential dwellings is calculated using the average front and side yard setbacks of the existing residential dwellings located on similar size lots, along the block face and facing block face of the lot in question. In many cases, these averaged setbacks are less than the bulk regulations in the R-4 and R-8 zoning districts, and allow for compatible construction without additional costs and concerns of the variance process to allow such deviation.

Cluster residential development. The City's zoning ordinance allows for cluster residential subdivision, which is based on the concept of reducing low size requirements for the provision of common open space within a development. The clustering of development will also reduce the length of needed roads, sidewalks, sewer line and drain systems, and may include the coordination of yard dimensions, location of lots of various sizes, location of buildings with respect to project boundary lines, open spaces, and maintenance of vegetation.

Occupancy definitions. HUD regulations state the occupancy standard to be two persons per bedroom plus one additional person per unit. The City of Fredericksburg places restrictions on the number of occupants in a unit and their relationship to one another.

As defined in the Zoning Code, a single-family dwelling unit is not to be occupied by more than one family. The State Code states that any residential facility, in which no more than eight mentally ill, mentally retarded, or developmentally disabled persons reside with one or more resident counselors or other staff persons, is considered a single-family dwelling. For the purposes of this definition, the term “mental illness and developmental disability” shall not include current illegal use of or addiction to a controlled substance as defined in Code of Virginia. The term “residential facility” is deemed to be any group home or other residential facility for which the state department of mental health, mental retardation and substance abuse services is the licensing authority pursuant to the Code of Virginia. The city of Fredericksburg adheres to this exception specified by the State Code.

The zoning office uses the zoning ordinance definition of a family to determine occupancy of a dwelling unit. According to the City Code, a family means “one person or two or more persons related by blood, adoption or marriage, living and cooking together as a single housekeeping unit, with no more than two boarders, or a group of not more than three unrelated persons living together as a single housekeeping unit.”

The City defines residential occupancy to protect the health and safety of its citizens. As the population of the City grows, the demand for housing increases and many people search for affordable housing options. During the past several years, the City has received an increasing number of complaints from its citizens regarding overcrowding in single-family dwellings. In its worst state, overcrowding results in a threat to public safety and the welfare of the occupants of the homes, as well as the neighborhood.

According to the City, health studies indicate that:

- Overcrowding increases a negative effect on children by restricting exercise and play areas.
- Overcrowding increases a negative psychological effect on the occupants by reducing privacy.
- Overcrowding increases physical and mental fatigue when performing routine household tasks.
- Overcrowding increases the risk of spreading infection and disease between occupants.

Special use permit. The zoning code includes provisions to allow group residential facilities (no more than eight mentally ill, mentally retarded, or developmentally disabled persons, with one or more resident counselors or other staff persons) to be located within any residential district. A Special Use Permit, however, is needed to allow homes for adults (with four or fewer persons), housing for elderly, institutional housing, nursing homes, boarding houses, rooming houses to be located within certain residential districts.

If a residential facility does not meet the single-family dwelling definition, and if reasonable accommodation is needed in order for them to meet the district requirements, the applicant may apply for a Special Exception or Special Use Permit through the Planning Department.

According to the Code, the term Special Use Permit means a use which, by its nature, could have an undue impact upon, or is incompatible with, other uses of land within a given zoning district. Upon approval of a Special Use Permit the special use may be allowed to locate within a given designated district under the standards, controls, limitations, performance criteria, restrictions and other regulations of the Special Use Permit.

A Special Use Permit application went to the Planning Commission on August 1, 2009 for a four unit transitional home for homeless women and their children (an extension for the Special Use Permit was submitted and approved in 2011.) The Planning Commission voted at their meeting on September 9, 2009, to recommend approval of the application to City Council. City Council held a public hearing on the application at their first meeting and voted final approval on October 13, 2009. According to the City, these steps are standard for any Special Use Permit application, and the process went very smoothly.

Planning and Development Fees. The City Manager has authority to establish fees for permits, inspections, and certificates required by the Uniform Statewide Building and Fire Code, subject to the approval of the City Council. The City has also established a set of fees associated with processing and hearing administrative appeals, petitions for rezoning, special uses, variances, subdivisions, reviewing permit applications and issuing permits for planning and development. The City's planning fees are fairly standard and do not raise any significant concerns.

There are a number of methods by which cities may provide affordable housing incentives. One method is by affecting government fees. According to the City, the average amount for a new construction permit would cost from \$1,000 to \$1,500. Approximately 2,700 residential building permits were issued during FY2010-2011, 119 of which were for new construction.

Buildings and Building Regulations. The City's office of Building and Development Services enforce the provisions of the Virginia Uniform Statewide Building Code. It performs building and site plan reviews, issues permits, and handles construction inspections for all regulated construction activities in the City. The responsibility of the Department is to promote the health,

safety, and general welfare of the public and to insure safety of life and property from all hazards incident to building design, construction, maintenance, use, repair, removal, or demolition.

According to Building and Development Services, the construction of buildings according to current accessibility standards is not an issue in Fredericksburg, because everyone is informed and understands the requirements. However, accessibility is more of a challenge in older buildings, built before current accessibility laws were enforced.

The City also requires the owner or managing agent of vacant buildings to register with the City. Each year the owner or managing agent must register with the property maintenance official the buildings they own or manage which have been vacant for a continuous period of 12 months or more. A building is vacant if it is not occupied in a manner consistent with the purpose for which it was built or typically occupied. For example, a single-family residence used for storage is considered vacant.

Code Enforcement. The Building Maintenance Official enforces the Maintenance of Existing Structures section of the Virginia Uniform Statewide Building Code. The Board of Building Code Appeals considers all appeals concerning Building Code enforcement.

The Building Code Appeals Board consists of five members, of various professions and knowledge and is appointed by the City Council. The board adopts and makes available to the public through its secretary, the procedures under which hearings and appeals are heard.

Typical code issues concern the maintenance of properties. Older properties tend to have structural and foundation problems, while the new construction violations are usually cosmetic issues.

Rental Housing Inspections. The City implemented a Residential Rental Housing Inspection Program in January 2007. Approximately 62 percent of occupied housing units in Fredericksburg are renter-occupied, which is the highest rate of renter-occupied units compared to surrounding communities.

The City Council began the Residential Rental Housing Inspection Program, to protect the life, safety and health of residential rental housing tenants, and to preserve neighborhoods in which residential rental housing is located. It was determined that rental housing units when not subject to periodic inspections to ensure compliance with applicable building maintenance regulations, may become unsafe, a public nuisance, and unfit for human habitation. The decline in the condition of residential rental housing can lead to a decline in neighborhood quality of life, neighborhood appearance, and the value of real estate.

According to the Virginia Code, a rental inspection program cannot be implemented citywide. Therefore, a rental inspection district is declared according to certain findings (concerning the health and safety of the occupants and the condition of the unit) by the City Council. Until the program was left unstaffed by City Council on July 1, 2010 due to budgetary constraints, the City mailed letters to the owners of the properties informing them of the program and asking them to register with the City. The initial inspection fee was \$50. If the unit had no violations, a certificate of compliance was issued and the unit will not have to be inspected for 4 years, unless a complaint is filed by a tenant.

The building maintenance official could conduct follow-up inspections of a rental unit, after the initial or periodic inspection, until the rental unit was brought into compliance with the provisions of the building code that affect the safe, decent and sanitary living conditions for the tenants. The owner was charged an additional \$100 for each additional inspection until the unit passes.

The building maintenance official can issue a certificate of compliance to any residential rental dwelling unit that passes inspection upon a follow-up inspection. The building maintenance official periodically re-inspects each such residential rental dwelling unit with a certificate of compliance on a two-year inspection cycle.

Inspections of rental housing units are still conducted City-wide on a complaint basis. City Council is considering whether or not to reinstate the program in the future.

Affordable Housing Policy. In 1989, the City of Fredericksburg adopted a city policy on affordable housing, which has been incorporated into the Comprehensive Plan, previously discussed. The City's original Affordable Housing Goal stated, "To provide safe, decent housing opportunities within the means of all persons who live and/or work in the City of Fredericksburg, Virginia."

The 2007 Comprehensive Plan Policy Framework states the following objective and policies to address affordable housing:

Housing. The City of Fredericksburg seeks to ensure that all persons who live and/or work within its boundaries have the opportunity to obtain safe, sound, and sanitary housing within the City's neighborhoods and communities. Policy statements include:

- Maintain the supply of affordable housing through rehabilitation of existing owner-occupied housing, and improve the physical quality of housing and neighborhoods through appropriate community development programs.

- Develop strategies that increase homeownership opportunities while also ensuring the City achieves an appropriate balance of housing choices.
- Continue to work with non-profit organizations that provide affordable housing opportunities.
- Reduce the economic barriers to affordable housing through community development programs.
- Provide for the accessibility of housing for persons who are physically disabled.
- Address the unmet supportive housing needs of persons with disabilities.

In 2006, the Economic Development Authority released JumpStart! Fredericksburg 2010 to identify realistic development recommendations for multiple commercial corridors, based on a combination of market analysis, economic feasibility, community input, and area design themes. One of the major themes of the report was housing affordability. Within the content of escalating housing costs, multifamily residential components were included in many of the corridor concepts. The report recommends that the City consider strategies to preserve units that are affordable. The report states that the City currently has a stock of affordable housing units, and should take efforts to preserve this housing for the future.

The report suggests inclusionary zoning and incentive based programs often connected with other affordable housing set-aside programs, which may include incentives, density bonuses, relaxed height restrictions, reduced parking requirements, expedited permitting, local infrastructure upgrades, and the provision of public amenities. Other programs are home purchase assistance programs and affordable housing financing tools.

Other Public Sector Programs and Services

Community Development Block Grant Program. The City's Community Development Block Grant (CDBG) program provides funding for housing rehabilitation assistance, the removal of architectural barriers for persons with disabilities, and direct homeownership assistance. The following activities are related to their CDBG goals.

Removing obstacles to meeting underserved needs. In order to ensure needs are being effectively met, the City ensures dwellings are safe and sanitary, through emergency roof, plumbing, and electrical repairs. The City also provides direct homeownership assistance to facilitate the affordability of homes for low- and moderate-income residents through its CDBG program and staff will continue to work with the Fredericksburg Regional Continuum of Care to meet the needs of the homeless population.

Fostering and Maintaining Affordable Housing. The City of Fredericksburg maintains the majority of the region's subsidized and assisted housing, as well as the majority of the area's

available rental housing. The City seeks to maintain this existing level of housing while concurrently working to conserve its other residential neighborhoods. The City's home rehabilitation assistance and direct homeownership assistance programs contribute to Fredericksburg's affordable housing and neighborhood conservation policies. The City also offers a variety of housing options including detached homes, townhomes and a variety of apartments. The City maintains a limited rental inspection program (complaint driven) to assist with the community development goals of maintaining the existing housing stock in a safe and sanitary condition.

Removing Barriers to Affordable Housing. To address this need, the City has modified zoning requirements for off-street parking for residential infill projects and altered setback requirements in the R-4 and R-8 residential zoning districts to promote new infill development. The City also funds programs that provide housing rehabilitation assistance, architectural barrier removal, and homeownership assistance.

Residential Anti-Displacement and Relocation Assistance Plan. The City of Fredericksburg adopted an anti-displacement and relocation plan in April 1996. It makes public the City's intent to: provide for housing replacement, provide for relocation assistance, and minimize displacement of all occupied and vacant habitable low/moderate-income housing units that are demolished or converted to other uses if an activity is assisted with CDBG funds.

The City does not normally and is not inclined to engage in projects that would require the implementation of the displacement and relocation plan. Instead, the City focuses on home rehabilitation and homeowner assistance projects to encourage residents to remain in their homes and promote new homeownership opportunities.

Public Transportation. Public transportation is an important part of a community to provide transportation for persons who cannot or choose not to drive. FREDericksburg Regional Transit (FRED) is the public transportation system that provides services to the citizens and visitors of the Fredericksburg Region. FRED provides bicycle racks and accessible transportation to everyone by providing a deviated fixed-route bus service.

All vehicles are equipped with wheelchair lifts. Drivers will assist persons on and off the bus when needed and make bus stop announcements regularly. Drivers are trained in passenger assistance, defensive driving, CPR, and procedures to secure wheelchairs. One personal care attendant may ride free. If a person requires a pick-up or drop-off that is off the fixed route, the person may notify FRED twenty-four hours in advance, and a route deviation can accommodate this need within a $\frac{3}{4}$ mile-off-route limit.

According to the Community Workshops held during the development of the update to the Comprehensive Plan, several participants mentioned the need to develop a first-rate transit system to improve public safety, air quality and pedestrian uses and to be a viable alternative to the automobile. The FRED transit system and the rail transportation were mentioned to be strengths of the community.

The Fredericksburg Area Metropolitan Planning Organization (FAMPO) provides long range transportation planning for City of Fredericksburg and the Counties of Caroline, King George, Spotsylvania and Stafford. FAMPO works with local officials, public transportation providers, the Virginia Department of Transportation and other state agencies to ensure that local and regional transportation priorities are coordinated with land use and other Comprehensive Plans.

Section VI.

Identification of Impediments to Fair Housing Choice and Recommendations

This section outlines the impediments to fair housing choice identified through the research for this AI and contains a recommended Fair Housing Action Plan (FHAP) for the City of Fredericksburg.

Summary of Impediments to Fair Housing Choice

Sections II through V present the research conducted as part of Fredericksburg's AI, as well as related findings. This research identified the following impediments to fair housing choice in the City of Fredericksburg:

Residents experiencing discrimination in housing “do nothing.” Eleven percent of respondents to the telephone survey said they have experienced housing discrimination at some point, even if the discrimination did not occur in Fredericksburg. This research suggests that about 2,709 people in the City of Fredericksburg have experienced discrimination, although discrimination based on income or inability to pay rent is not protected under the Fair Housing Act. Of the people who claimed to have experienced discrimination, 14.3 percent said it was because of class.

Survey results also reported that Fredericksburg residents are not well informed about how to report discrimination or inquire about fair housing concerns. When asked “whom would you contact about housing discrimination in Fredericksburg”, 29 percent said they did not know.

Finally, when Fredericksburg residents experience discrimination, few take action to report it. Of the Fredericksburg residents surveyed who thought they had experienced discrimination, the majority “did nothing about it” (61 percent). When asked where they would obtain information about their fair housing rights, 17 percent said they did not know.

Key persons interviewed for the study did not express much concern about housing discrimination, although stakeholders believe that violations probably do occur. It is important that education, outreach, and systems to file complaints are in place to help citizens identify and make complaints about fair housing violations.

Lack of affordable housing development. Several key persons identified the lack of affordable housing in Fredericksburg as the biggest problem in the community. Restrictive zoning ordinances do not provide incentives for builders to provide affordable housing. While residents would like to stay/live in Fredericksburg, added construction costs potentially raise the cost of housing and forces many residents to move out of the City, to be able to afford to buy or rent a dwelling.

Affordable housing. There are 2,130 households that are categorized as extremely low income. The Housing Choice Voucher program has a waiting list of 310 vouchers and is closed to Fredericksburg residents. This slow turnover rate for the vouchers, along with a lack of subsidized housing, creates limitations to access to affordable housing. Key persons also identified gentrification as a problem, which is a result of increased property values. Citizens on fixed income, especially senior citizens and persons with disabilities cannot afford rising housing costs.

Persons with disabilities face barriers to housing choice. Although the team did not conduct testing or other quantitative assessments of the fair housing barriers in Fredericksburg faced by persons with disabilities, evidence from interviews suggests that barriers do exist. Respondents suggested that many disabled persons live on a fixed income, and when their rents increase, they have a difficult time affording their rents. Organizations that assist persons with disabilities reported that there is a lack of accessible housing in the area and that the rents for accessible units are not affordable to many in the disabled community.

One telephone interview respondent suggested concern over her child's ability to access living arrangements once she passes.

Respondents also suggested that improved accessibility, including more ramps, fewer stairs, and more accessible bathrooms are needed throughout the community, which would also increase awareness of the needs (both housing needs and supportive service needs) of the disabled population.

NIMBYism. Several key person interviews identified neighborhood resistance and an attitude of Not-In-My-Backyard (NIMBY) as impediments to the provision and development of affordable housing and the placement of supportive services in Fredericksburg and the surrounding area.

Recommended Fair Housing Action Plan

Based on the research for this AI, in conjunction with a review of the previous Fair Housing Action Plan, the team recommends that the City of Fredericksburg consider the FHAP and activities for reducing fair housing impediments.

Action Item 1. Raise the visibility of fair housing statutes and the complaint process. As mentioned previously, when asked what they did when discriminated against, most survey respondents said they "did nothing" about the discrimination. Sixty-one percent did not take action to obtain information or to report their situation. When asked, "Whom would you contact if you experienced housing discrimination in Fredericksburg?" 29 percent did not know.

A review of the City of Fredericksburg's website found information that was recommended by the 2007 AI. A description of the CDBG programs, a definition of fair housing, and instructions for filing a Fair Housing complaint are already included in the Planning and Community Development section of www.fredericksburgva.gov's website.

The City of Fredericksburg should also create a plan to raise its fair housing visibility through additional public outreach. The City and its local fair housing agency (currently the Central Virginia Housing Coalition) should conduct presentations and distribute information about fair housing through public forums and services.

One option would be to develop a small brochure to be placed near public use computers in libraries, computer rooms in housing developments, in places where publicly available activities occur, and in churches.

Action Item 2. Consider incentives and alternative funding sources to encourage and increase affordable housing development. Development and support of affordable housing require concerted efforts by multiple parties including government agencies, housing organizations, nonprofits, advocates, and real estate professionals. These entities should continually coordinate affordable housing efforts, perhaps guided by the strategies developed in the City's Affordable Housing Policy and the housing policy of the Comprehensive Plan.

The City should update its Affordable Housing Policy, during the update of its Comprehensive Plan. An examination of the proportion of units in the City that are affordable to lower income residents will assist in setting actual and attainable goals for affordable housing. The City should also examine how it can more effectively facilitate affordable housing development through development fees and approvals. It should consider a local ordinance to encourage or mandate affordable housing in new development, as well as exploring the feasibility of a trust fund to assist with affordable housing acquisition and development.

Action Item 3. Increase landlord and resident awareness and knowledge of fair housing. In coordination with the Landlord Licensing process, distribute fair housing literature that landlords must acknowledge with the issuance of the annual license.

Conduct public service campaigns to inform citizens about fair housing issues. Work with affordable housing providers to reach renters most likely to be affected by fair housing issues.

Maintain a person at the City who is the central point of contact on fair housing issues for residents and landlords as well as for other City departments. This person would receive training on fair housing issues, communicate with state and local fair housing groups and HUD, and refer residents wishing to file complaints with follow-up as necessary.

Action Item 4. Work to assist residents with special needs to have full access to housing and needed services. Continue to dedicate funding to improve housing accessibility for persons with disabilities. Specifically, funding should go to remove architectural barriers for persons with disabilities and to rehabilitate housing for accessibility.

Conduct fair housing training sessions with landlords and property managers, particularly those who serve the city's lowest-income and special-needs populations. We recommend that the City bring in an outside party, perceived as neutral, to conduct these sessions. A key element of the training would be to present case studies on tricky landlord/tenant situations and to resolve the situations. Participants would be able to offer their own situations for group discussion and to explore solutions.

Continue to be part of efforts to improve public transportation (FREDericksburg Regional Transit) in an effort to strengthen the employment/transportation/housing link in Fredericksburg and surrounding areas.

Action Item 5. Ensure an orderly transfer of property assets to facilitate home improvement loans. Education about the legal aspects of property transfer between generations will help families to be able to obtain home improvement loans. Property owners who die intestate (without a will) and who have multiple heirs leave a legal tangle that can make it difficult for heirs to obtain property improvement loans. The City should work with the appropriate organization (e.g., legal services) to initiate education and assistance to ensure an orderly transfer of assets, which will mitigate some difficulties in obtaining credit.

Action Item 6. Work to reduce NIMBYism. Reduce negative impressions of affordable housing by supporting good property management and reducing violations through aggressive code enforcement, and through a more robust rental inspection program. Reinstate the systematic rental inspection program as it existed prior to July 1, 2010. Solid maintenance of affordable properties can go a long way toward reducing the stigma of affordable housing.

When applications for new affordable housing are submitted for public review, the City should take initiative on public relations efforts and resident education in support of addressing the need for affordable housing. This could include working with nonprofit developers to create a strategy of ongoing education for City residents and public officials around affordable housing and to facilitate tours of model developments, as appropriate.

Maintenance of Records

Per Section 2.14 in HUD's Fair Housing Planning Guide, the City of Fredericksburg will maintain the following data and information as documentation of the county's Fair Housing Plan:

A copy of the AI and any updates.

A list of actions taken each year as part of the Fair Housing Plan to eliminate the impediments identified in the AI.

At the end of each program year as part of the Consolidated Annual Performance and Evaluation Report, Fredericksburg will include information about the actions taken to fulfill the Fair Housing Plan and an analysis of their impact.

Structure for Oversight Responsibilities, Monitoring & Evaluation

The completion of this AI was overseen by the City of Fredericksburg Planning and Community Development Department.

The Planning and Community Development Department will oversee the implementation of the Fair Housing Action Plan. The City will continue to support Rappahannock Legal Services to update the "Guide to Virginia Landlord-Tenant Law and Local Rental Housing in Planning District 16" and an additional \$10,400 to prevent homelessness and to assist in obtaining affordable housing for 140 families. The removal of architectural barriers for persons with disabilities will receive \$8,400 to maximize independence and self-sufficiency of disabled residents; approximately \$61,436 will go toward housing rehabilitation assistance to maintain existing affordable dwellings; and \$21,700 will be used for direct homeownership assistance to promote affordability of housing units.

The Department will be responsible for putting fair housing information on the City's website and implementing an affordable housing plan. The Department will also oversee the City's efforts to better understand consumer credit issues and the need for accessible housing.

The Planning and Community Development Department will be ultimately responsible for carrying out the Fair Housing Action Plan. To ensure that the Plan is carried out, the Department will conduct an evaluation of each activity during each program year, identify additional areas that require study or analysis, and determine how to address those additional areas. As part of its monitoring efforts, The Department will also continue to obtain quarterly progress reports from the Rappahannock Legal Services.