

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 2019, the City of Fredericksburg partnered with Rachael Thayer, a student from the University of Mary Washington, to conduct an Analysis of Impediments to Fair Housing Choice (AI) for the City of Fredericksburg. This section will introduce the study, provide information on the Fair Housing Act and the State of Virginia fair housing law, and present 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, 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 the age of 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 of age. Some of the transactions that the state fair housing law applies to include: renting an apartment, buying a home, obtaining a mortgage and obtain 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 resident 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. Legal Aid Works (LAW) 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 the Fredericksburg AI, an internet survey was produced and posted to multiple sites for residents to participate with. A total of 75 responses were submitted and used to gather information about Fredericksburg residents and their experiences with fair housing. The survey was published through social media and local news outlets. The respondents are a random sampling of the general population. Eight key person interviews took place with individuals knowledgeable about fair housing issues and housing and social service needs within the City.

Funding

The AI research and report were unfunded, as Rachael Thayer served as an unpaid intern, earning college credit from the University of Mary Washington. Plan implementation is funded by the Community Development Block Grant.

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 (BBS) conducted a complete analysis again in 2007. In 2012, the City of Fredericksburg partnered with two interns from the University of Mary Washington to complete another AI. Many of the goals and objectives in the 2012 AI have been successfully achieved and, in some instances, exceeded.

The City continued to work with Legal Aid Works, previously Rappahannock Legal Services, Inc., during the past seven years to provide education, counseling, and legal defense related to the Virginia Residential Landlord Tenant Act. City funding allowed LAW to continue to update the "Landlord-Tenant Law and Local Rental Housing for Fredericksburg (2019-2020)," 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 fair housing public forums and public outreach efforts at events over the last seven years.

Research Methodology

The project team's approach to the Fredericksburg AI was based on the report conducted in 2007 by BBC, the report conducted in 2012 by the UMW interns Brian Auricchio and Brianna Gavigan, the methodologies recommended in HUD's *Fair Housing Planning Guide, Vol. I.*, and the analysis that had been completed for the City's Consolidated Plan of 2015.

The work scope consisted of the following:

Task 1. Project initiation. City staff briefed Thayer 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, 2013-2017 American Community Survey (ACS), and data collected by the City to produce a community and housing profile to provide background data for the AI.

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 representatives from agencies serving special needs populations.

Task 6. Public survey. As part of the AI, the City of Fredericksburg created a random internet survey to gather information about their experience with fair housing and knowledge of fair housing laws. It was distributed through local media and mailing lists.

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 Caroline, King George, Spotsylvania, and Stafford County are reported where relevant. Statistics for Culpeper and Richmond are included and analyzed to assess conditions in nearby comparative cities and towns.

The data collected and analyzed for this section were gathered from the 2010 U.S. Census, 2010-2015 and 2015-2017 American Community Surveys (ACS), projections from the Fredericksburg Regional Alliance (FRA), the City of Fredericksburg, HUD, and the Bureau of Labor Statistics.

General Demographics

Population. The 2017 ACS reported that the City of Fredericksburg had a total population of 28,135 persons. This is an increase from the 24,286 persons reported in the 2010 U.S. Census. From 2010 to 2017, the City’s population grew by 15.8 percent in the seven years.

Exhibit II-1

Population Trends, City of Fredericksburg and Surrounding Areas, 2010 to 2017

Municipality	2010 Census	2015 ACS	2017 ACS	Percent Change 2010-2017
Fredericksburg	24,286	27,395	28,135	15.8%
Richmond	204,214	213,735	220,895	8.2%
Caroline	28,545	29,349	29,889	4.7%
Culpeper	46,689	48,424	49,795	6.7%
King George	23,584	24,933	25,564	8.4%
Spotsylvania	122,397	127,691	130,159	6.3%
Stafford	128,961	137,145	141,159	9.5%

Source: 2010 U.S. Census, 2015 and 2017 American Community Survey 5-Year Estimates

Gender and age distribution. In 2017, the City of Fredericksburg’s residents were 45.8 percent male and 54.2 percent female. This is the largest gender gap for the seven municipalities examined. King George County had the most equal distribution with 49.8 percent male and 50.2 percent female residents.

The age cohort with the largest number of residents for the City of Fredericksburg was the age group of Under 18 years old, which grew 22.4 percent from 2010 to 2017. There was a 1.7 percent decrease in the age cohort group of 18 to 24 year olds, which previously was the largest group. The age cohort group of 18 to 24 year olds still is the second largest group, which may be because of the University of Mary Washington’s main demographics, which are female students in this age cohort. There was a 35.2 percent increase in the age cohort of 35 to 44 years old in the City. Exhibit II-2 displays the age distribution and percent change for the City of Fredericksburg for 2010 and 2017.

Exhibit II-2

Age Distribution, City of Fredericksburg, 2017

Age Cohort	2010 Census	2017 ACS	Percent Change 2010-2017
Under 18	4,779	5,850	22.4%
18 to 24	5,649	5,551	-1.7%
25 to 34	3,808	4,463	17.2%
35 to 44	2,732	3,693	35.2%
45 to 54	2,753	2,925	6.2%
55 to 64	2,152	2,693	25.1%
65 and older	2,413	2,960	22.7%

Source: 2010 U.S. Census, 2013-2017 American Community Survey 5-Year Estimates

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 or older and had a response of “yes” to a sensory, physical, mental, or self-care disability, (2) they were 16 years old or older 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-the-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 employment condition lasting 6 months or more which made it difficult to perform certain activities. All disability data from the Census were self-reported by respondents.

Exhibit II-3

Amount of Total Population with a Disability, City of Fredericksburg, 2017

Age Cohort	Total Population	Population with a Disability	Percent of Total Disability Population
Under 5	1,949	0	0%
Ages 5 to 17	3,884	155	3.9%
Ages 18 to 65	19,187	1,666	8.7%
Ages 65 and Older	2,916	1,028	35.3%
Total	27,936	2,849	10.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

The estimates show that 2,849 people over the age of four in the City of Fredericksburg live with at least one type of disability. That comes to approximately 10.2% of the total population within the city. The age cohort with the largest percent disabled was the ages 65 and older, with 35.3% of the population living with at least one disability based on the American Community Survey estimates from 2017. Exhibit II-4 shows the distribution of population by disability type.

Exhibit II-4**Population by Type of Disability, City of Fredericksburg, 2017**

Type of Disability	Population with Specific Disability
Hearing Difficulty	852
Vision Difficulty	642
Cognitive Difficulty	1,033
Ambulatory Difficulty	1,210
Self-Care Difficulty	580
Individual Living Difficulty	951
Total	5,268

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Note: The totals do not match the total population from Exhibit II-3 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.”

In Exhibit II-5, the majority of the city of Fredericksburg’s residents are White, at 64.5 percent of the total population. The next largest racial categories are Black/African American at 22.5 percent. Approximately percent 10.7% of the population indentified as the Hispanic/Latino ethnicity in 2017.

Exhibit II-5**Distribution of Race and Ethnicity, City of Fredericksburg and Surrounding Areas, 2017**

Race/ Ethnicity	Fredericksburg	Richmond	Caroline	King George	Spotsylvania	Stafford
American Indian/Alaska Native	0%	0.2%	0.4%	0.2%	0.3%	0.3%
Asian	2.4%	2.1%	0.9%	1.1%	2.6%	3.1%
Black/African American	21.3%	47.9%	28.1%	16.4%	15.4%	16.4%
Native Hawaiian/ Other Pacific Islander	0.1%	0%	0%	0.1%	0.1%	0.1%
White	60.0%	40.0%	63.6%	73.8%	69.5%	63.7%
Other Race	0%	0.2%	0.5%	0.1%	0.3%	0.2%
Two or more races	5.5%	3.1%	2.2%	3.8%	2.8%	4.6%
Hispanic/ Latino	10.7%	6.5%	4.3%	4.6%	9.0%	11.7%

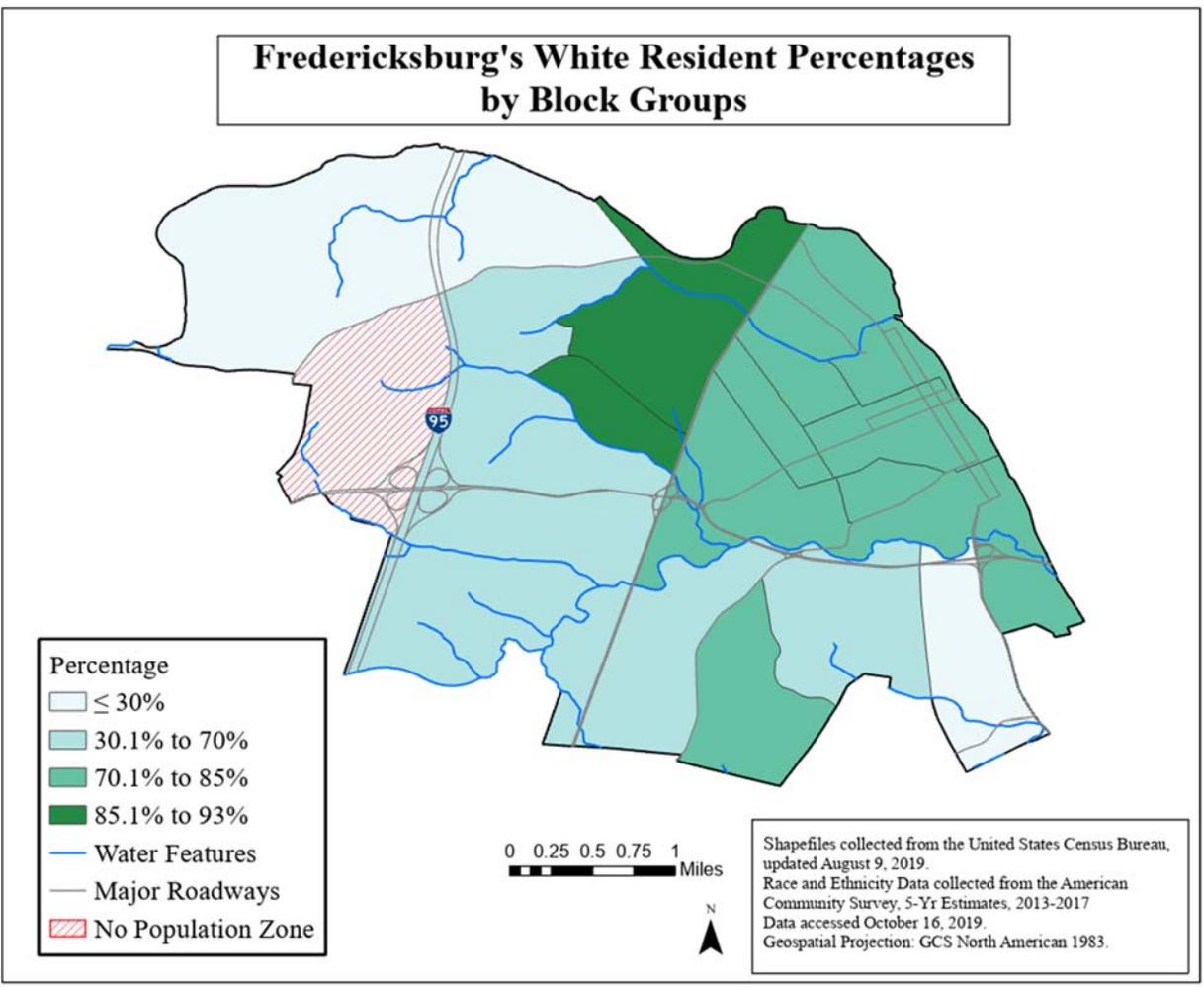
Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Population growth. The Hispanic/Latino population of all but Stafford County grew or stayed the same from the 2010 Census count. The Fredericksburg Hispanic/Latino population count stayed the same at 10.7% from 2010 to 2017.

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 preference—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 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. These distributions can be seen in the maps below.

Exhibit II-6

Map of White Residents by Block Group, City of Fredericksburg, 2017

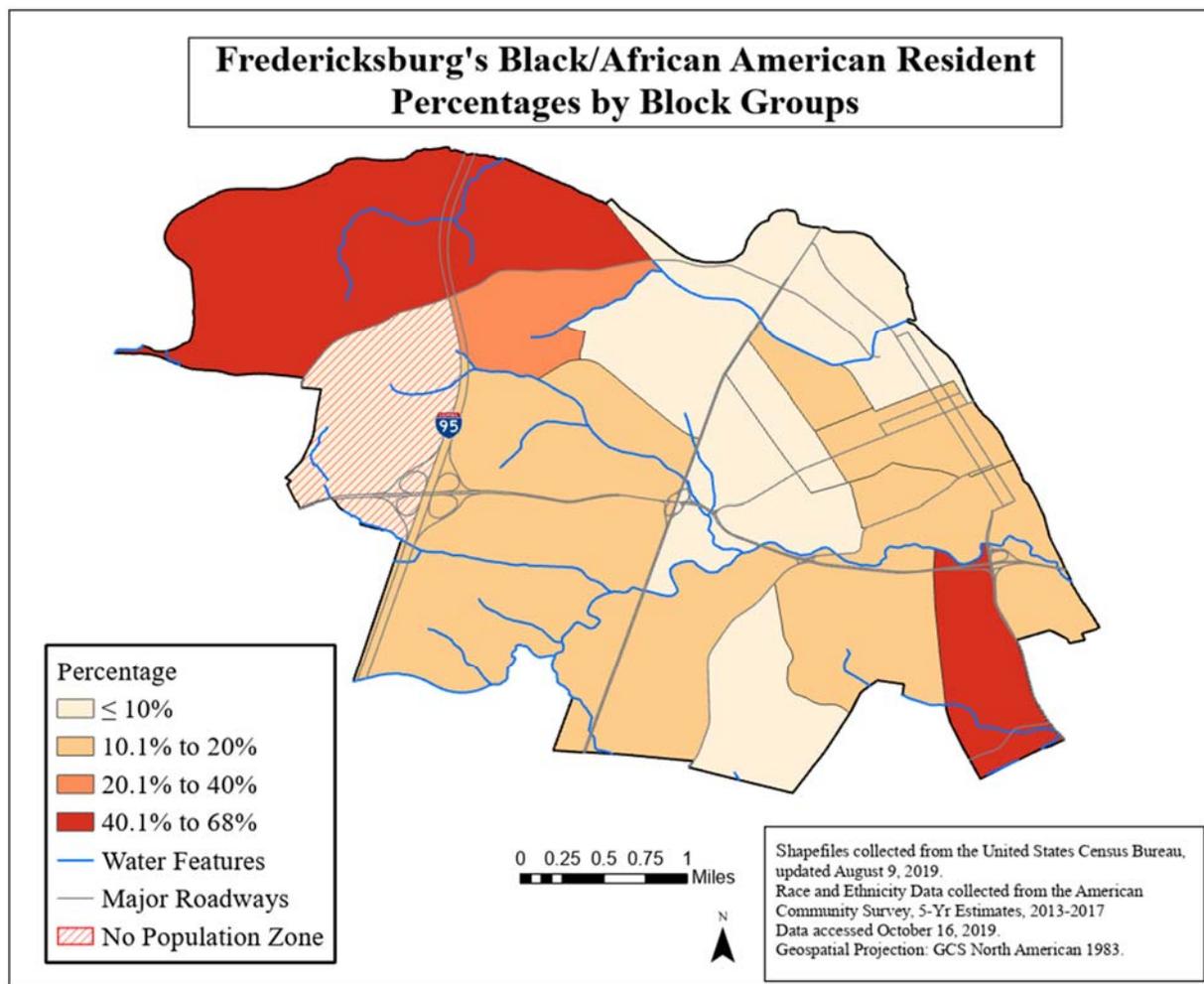


Source: 2013-2017 American Community Survey 5-Year Estimates

Areas of concentration of white residents include the downtown core and surrounding neighborhoods. The University of Mary Washington and the surrounding neighborhoods also have a majority of white residents. The neighborhood of Normandy Village contains the largest concentration of white residents.

Exhibit II-7

Map of Black/African American Residents by Block Group, City of Fredericksburg, 2017

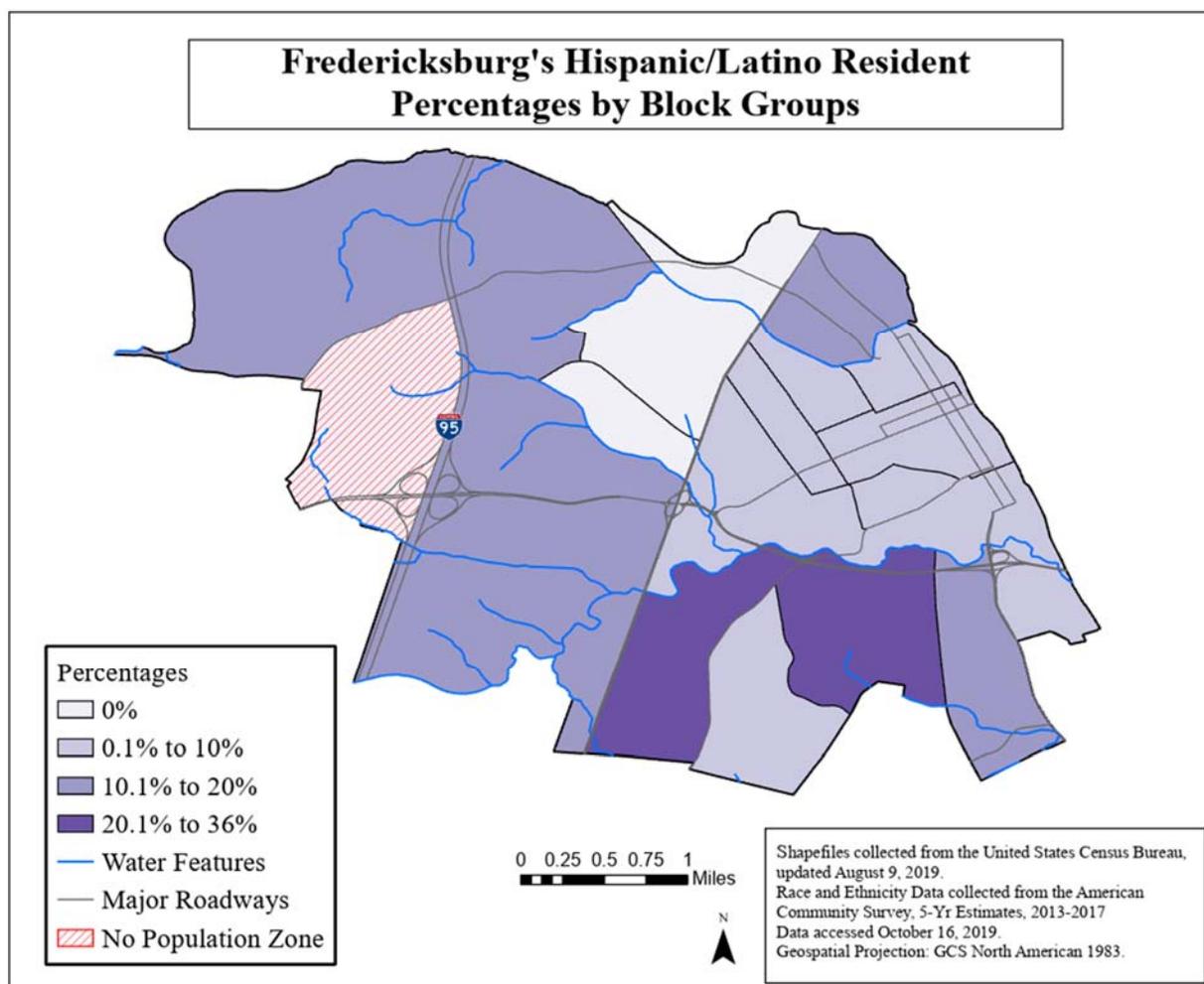


Source: 2013-2017 American Community Survey 5-Year Estimates

There are two areas within the City of Fredericksburg that have a high percentage or majority of residents who are African American. The Mayfield neighborhood, in the East of the City is a historically black neighborhood. The other area of high black residents is in the north. This area contains affordable housing communities and the Bragg Hill community.

Exhibit II-8

Map of Hispanic/Latino Residents by Block Group, City of Fredericksburg, 2017



Source: 2013-2017 American Community Survey 5-Year Estimates

Fredericksburg residents of Hispanic ethnicity live throughout the City of Fredericksburg but there is a large concentration along the Lafayette and Route 1 Corridors. The only area which lacks residents of Hispanic ethnicity is the Normandy Village neighborhood.

Housing Units and Households. From 2010 to 2017, the City of Fredericksburg had an increase in housing units of 1,078, at a percent increase of 10 percent. The largest increase of housing units was seen by Fredericksburg while the smallest increase was seen by Richmond, which had an increase of just 1 percent. Spotsylvania County grew by 3 percent and Stafford County grew by 8 percent.

Exhibit II-10 displays the increase in households in the seven municipalities examined. The City of Fredericksburg had an increase of 13.2 percent in the number of households from 2010 to 2017. This is the largest increase in the number of households, which corresponds to the 10

percent increase in the number of housing units. Though the number of households has not yet outgrown the number of housing units, the household population is growing at a faster rate than the growth in housing units.

Exhibit II-9

Number of Housing Units, City of Fredericksburg and Surrounding Areas, 2010 to 2017

Municipality	2010 Census	2017 ACS	Percent Change from 2010 to 2017
Fredericksburg	10,467	11,545	9.3%
Richmond	98,349	99,737	1.4%
Caroline	11,454	12,107	5.4%
Culpeper	17,657	18,307	3.6%
King George	9,221	9,925	7%
Spotsylvania	45,185	46,594	3%
Stafford	43,978	47,345	7.1%

Source: 2010 U.S. Census, 2013-2017 American Community Survey 5-Year Estimates

Exhibit II-10

Number of Households, City of Fredericksburg and Surrounding Areas, 2010 to 2017

Municipality	2010 Census	2017 ACS	Percent Change from 2010 to 2017
Fredericksburg City	9,206	10,419	13.2%
Richmond City	83,498	89,238	6.9%
Caroline	10,270	10,815	5.3%
Culpeper	15,834	16,837	6.3%
King George	8,194	8,972	9.5%
Spotsylvania	41,009	43,279	5.5%
Stafford	40,183	45,345	12.8%

Source: 2010 U.S. Census, 2013-2017 American Community Survey 5-Year Estimates

Familial Status. Discrimination based on familial status and large households is a common fair housing issue in many communities. Below are some common household characteristics which correlate to fair housing and affordable housing.

In 2017, 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, at a percentage of 30.3 percent, compared to the 5.2 percent of households headed by males with no wife. These are seen in the table below, Exhibit II-11.

Exhibit II-11

Household Type, City of Fredericksburg, 2017

Household Type	Number	Percent
Family household	5,701	54.7%
Married-Couple	3,685	64.5%
Male Householder- no Wife	295	5.2%
Female Householder- no Husband	1,721	30.3%
Non-Family Household	4,718	45.3%
Total Occupied	10,419	100%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

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 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-12 below, the average household size in 2010 was 2.28 persons for the City of Fredericksburg. This increased in 2017 by 0.16, making the average 2.44 persons per household. Richmond remained have the smallest average household size of the seven areas, with an average of 2.35 persons per household. Stafford County has the largest average, of 3.04 persons per household.

Exhibit II-12**Average Household Size, City of Fredericksburg and Surrounding Areas, 2010 to 2017**

Municipality	Owners 2017	Renters 2017	All households 2010	All households 2017
Fredericksburg	2.69	2.3	2.28	2.44
Richmond	2.33	2.36	2.2	2.35
Caroline	2.58	2.52	2.65	2.57
Culpeper	2.91	2.77	2.78	2.87
King George	2.8	2.93	2.65	2.83
Spotsylvania	2.98	3.04	2.91	3
Stafford	3.05	3.01	3	3.04

Source: 2010 U.S. Census, 2013-2017 American Community Survey 5-Year Estimates

Household income. The 2013-2017 American Community Survey 5-Year Estimates reported that the City of Fredericksburg's median household income was \$57,258 in 2017, an increase of 31.5 percent. Richmond continued to have the lowest median income per household, at \$42,356 which was only a 10.7% increase from 2010. Stafford County continued to have the highest median income of the seven areas at \$103,005 per household, also a 10.7% increase from 2010. Fredericksburg had the largest growth in median household income within the region.

Exhibit II-13**Median Household Income, City of Fredericksburg and Surrounding Areas, 2010 and 2017**

Municipality	2010 ACS	2017 ACS	Percent Change 2010 to 2017
Fredericksburg	\$43,558	\$57,258	31.5%
Richmond	\$38,266	\$42,356	10.7%
Caroline	\$57,690	\$60,925	5.6%
Culpeper	\$57,908	\$69,693	20.4%
King George	\$76,241	\$84,770	11.2%
Spotsylvania	\$76,574	\$81,434	6.3%
Stafford	\$93,065	\$103,005	10.7%

Source: 2006-2010 and 2013-2017 American Community Survey 5-Year Estimates

Housing needs are determined from updated 2009 Census data. Exhibit II-14 displays income categories split between renters and owners. The total percentage of households under the median income is 48.2 percent. Renters have a higher number of below median income households than owners, with a 61.5 percent total of renters falling below this line.

Exhibit II-14

Income Categories for Renters and owners, City of Fredericksburg, 2017

Income Category	Renters	Percent of Total Renters	Owners	Percent of Total Owners	Total Percent of Population
Extremely low-income (30% of area median income or below)	2,325	34.8%	305	8.1%	25.2%
Low-income (30-50% of area median income)	1,235	18.5%	345	9.2%	15.2%
Middle-income (80-95% of area median income)	545	8.2%	265	7.1%	7.7%
Total	4,105	61.5%	915	24.4%	48.2%

Source: Comprehensive Housing Affordability Strategy data, 2012-2016.

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 2019, the federal poverty level for a family of four was \$25,750. In 2017, approximately 16.3 percent of the residents in Fredericksburg were below the poverty threshold, which totaled to around 4,169 people. The age cohort with the highest percentage is the ages between 18 and 34, with a percentage of 22.4 percent. The under 18 years of age cohort had to second highest percentage at 20 percent. Poverty rates were lowest for the 65 and older population, at only a 9.2 percent.

Exhibit II-15

Poverty by Age Cohort, City of Fredericksburg, 2013-2017

Age Cohort	Population below the Poverty Line	Percent of Total Age Cohort
Under 18	1,159	20%
18 to 34	1,700	22.4%
35 to 64	1,041	11.2%
65 and Older	269	9.2%
Total	4,169	16.3%

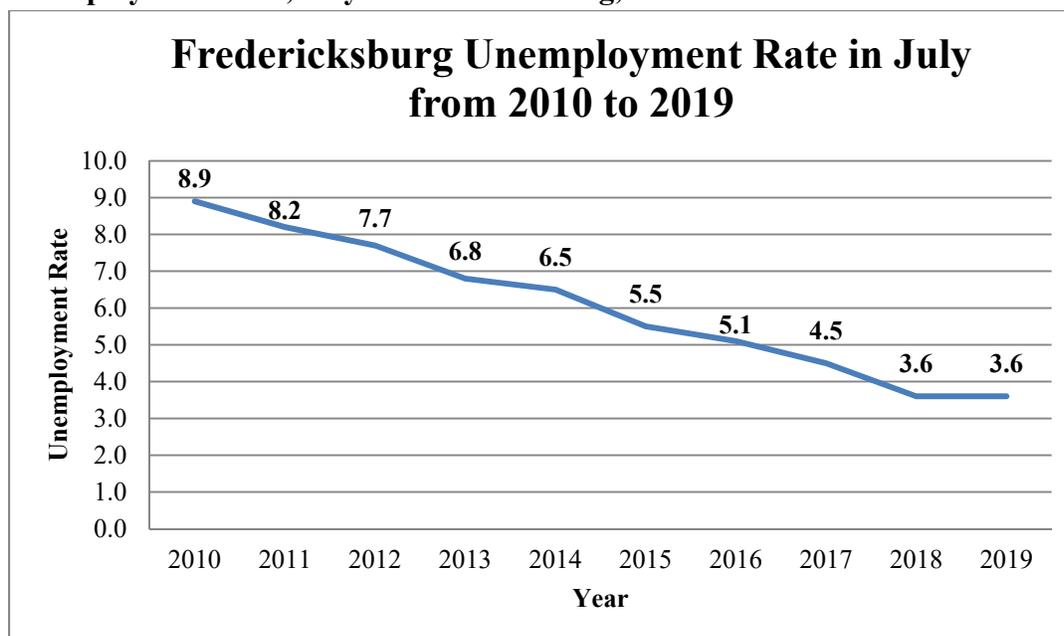
Source: 2013-2017 American Community Survey 5-Year Estimates

Employment Profile

According to the Virginia Economic Development Partnership's Community profile of the City of Fredericksburg, Virginia, the city had a civilian labor force of 13,690 in 2018 with a participation percentage of 68.3 from 2013 to 2017. The U.S. Department of Labor stated that in July of 2010, Fredericksburg's unemployment rate was 8.9 percent. In July of 2019, the unemployment rate has decreased to 3.6 percent with a net change of -5.3, and is now below the national unemployment rate of 3.8 percent as of July 2019.

Exhibit II-16

Unemployment Rate, City of Fredericksburg, 2010-2017



Source: U.S. Department of Labor Statistics, July 2019

Note: Not Seasonally Adjusted

Projections of employment growth by type. The Virginia Employment Commission provides employment projections for the Bay Consortium, a geographic area that includes Fredericksburg. Exhibit II-17 displays some of the projections outlined by the VEC. The employment projections data is broken down into over three hundred categories of industry and employment type, making an accurate count of the industry difficult to obtain. The data projections below are based off of the overall category for each industry, however due to overlap in types of employment, the figures may be disproportionate to the reality of the 2016 employment of the Bat Consortium.

The industry with the highest percent of employment growth in the Bay Consortium is the Other Services (except Public Administration) with a projected increase of 41.5 percent. The second largest industry project is the Professional, Scientific, and Technical Services with a projected

increase of 30.7 percent. In 2016, the largest industry by employment was Accommodation and Food Services, employing approximately 16,753.

Exhibit II-17

Occupational and Industry Projections, Bay Consortium, 2016 to 2026

Industry	Estimated 2016	Projected 2026	Numerical Change	Percent Change
Agriculture, Forestry, Fishing and Hunting	1,054	1,125	71	6.7%
Construction	7,310	8,062	752	10.3%
Manufacturing and Wholesale Trade	1,158	1,195	37	3.2%
Transportation and Warehousing	10,458	11,361	903	8.6%
Finance and Insurance	1,182	1,365	183	15.5%
Real Estate and Renting and Leasing	702	736	34	4.8%
Professional, Scientific, and Technical Services	658	860	202	30.7%
Management of Companies and Enterprises	6,517	7,346	829	12.7%
Health Care and Social Assistance	8,295	10,052	1,757	21.2%
Arts, Entertainment, and Recreation	1,627	1,885	258	15.9%
Accommodation and Food Services	16,753	19,125	2,371	14.2%
Educational Services	13,501	15,286	1,785	13.2%
Receptionists and Information clerks	1,708	2,040	332	19.4%
Other Services (except Public Administration)	5,752	8,139	2,387	41.5%

Source: Virginia Employment Commission, Long Term Industry and Occupational Projections, 2016-2026

Note: Projections data is for Bay Consortium (LWIA XIII). No data available for Fredericksburg City.

Commuting and transportation patterns. The 2017 ACS report provides the general commuting patterns for workers in the Fredericksburg area. There are 5,229 residents in Fredericksburg who also work in the city, while there are 7,284 residents who live in the city and commute outside of the city for work. There are a total of 13,282 workers that live in the City of Fredericksburg.

Exhibit II-18**Commuting Patterns, City of Fredericksburg, 2017**

Workplace of Residents	Number of Workers
Total Workers	13,282
Worked in state of residence	12,513
Worked in county of residence	5,229
Worked outside county of residence	7,284
Worked outside state of residence	769

Source: 2013-2017 American Community Survey 5-Year Estimates

Housing Profile

According to the 2017 ACS, there were 11,545 housing units in Fredericksburg during that year. The following Exhibit II-19 shows the occupied housing units in Fredericksburg and the surrounding areas. There was a 10 percent increase in the number of occupied housing units from 2010 to 2017, meaning there is an increase in the number of people moving and living in Fredericksburg, rather than the surrounding areas. The City of Fredericksburg has the highest percent change out of the seven municipalities, with Stafford having the second largest at 9 percent.

Exhibit II-19**Number of Occupied Housing Units, City of Fredericksburg and Surrounding Areas, 2010 and 2017**

Municipality	2010 Census	2017 ACS	Percent Change
Fredericksburg	9,505	10,419	10%
Richmond	87,151	89,238	2%
Caroline	10,456	10,815	3%
Culpeper	16,231	16,837	4%
King George	8,376	8,972	7%
Spotsylvania	41,942	43,279	3%
Stafford	41,769	45,345	9%

Source: 2010 U.S. Census, 2013-2017 American Community Survey 5-Year Estimates

Tenure. Approximately 36 percent of all housing units in the City of Fredericksburg are occupied by owners, while the remaining 64 percent are occupied by renters. Fredericksburg has the highest percentage of units occupied by renters of the seven municipalities, with Richmond being the second highest. Caroline County has the highest percentage of owner occupied units,

with 80 percent of the units being owner occupied. The following Exhibit shows the distribution of owner occupied and renter occupied units for 2017.

Exhibit II-20

Number and Percent of Housing Units by Tenure, City of Fredericksburg and Surrounding Areas, 2017

Municipality	Number Owner-Occupied	Percent Owner-Occupied	Number Renter-Occupied	Percent Renter-Occupied
Fredericksburg	3,746	36%	6,673	64%
Richmond	37,190	42%	52,048	58%
Caroline	8,668	80%	2,147	20%
Culpeper	12,272	73%	4,565	27%
King George	6,780	76%	2,192	24%
Spotsylvania	33,482	77%	9,797	23%
Stafford	34,377	76%	10,968	24%

Source: 2013-2017 American Community Survey 5-Year Estimates

Cost of housing. Based on the 2013-2017 American Community Survey 5-Year Estimates, the median home value in Fredericksburg was \$321,400 and the median monthly rent was \$1,184 in 2017. Exhibit II-21 and Exhibit II-22 below distributes the monthly rents and house values for Fredericksburg.

Exhibit II-21

Home Values, City of Fredericksburg, 2017

Home Value	Percentage of Housing Stock
\$0 to \$99,999	6%
\$100,000 to \$149,999	4.3%
\$150,000 to \$199,999	4.8%
\$200,000 to \$299,999	21.1%
\$300,000 to \$499,999	48.5%
\$500,000 or more	15.2%
Median	\$341,200

Source: 2013-2017 American Community Survey 5-Year Estimates

Exhibit II-22**Monthly Rents, City of Fredericksburg, 2017**

Monthly Rent	Percentage of Rental Units
Less than \$200	4.7%
\$200 to \$499	2.8%
\$500 to \$749	8.1%
\$750 to \$999	34.9%
\$1,000 to \$1,499	38.5%
\$1,500 or more	11%
Median	\$1,184

Source: 2013-2017 American Community Survey 5-Year Estimates

Approximately 10.3 percent of the homes in Fredericksburg are valued at less than \$150,000. The highest percentage of house value is 48.5 percent in the \$300,000 to \$499,999 category. The highest percentage of rental units is 38.5 percent, in the monthly rent category of between \$1,000 and \$1,499, with the median monthly rent for Fredericksburg being \$1,184. Fredericksburg has the highest median home value and third highest median gross monthly rent, with Stafford at the top and Spotsylvania in the second position.

Exhibit II-23**Median Home Values and Rent, City of Fredericksburg and Surrounding Areas, 2013-2017**

Municipality	Median Home Value
Fredericksburg	\$341,200
Richmond	\$209,200
Caroline	\$193,200
Culpeper	\$266,400
King George	\$294,300
Spotsylvania	\$265,600
Stafford	\$327,600

Source: 2013-2017 American Community Survey 5-Year Estimates

Exhibit III-24**Median Rent, City of Fredericksburg and Surrounding Areas, 2013-2017**

Municipality	Median Gross Monthly Rent
Fredericksburg	\$1,184
Richmond	\$942
Caroline	\$996
Culpeper	\$1,092
King George	\$1,178
Spotsylvania	\$1,400
Stafford	\$1,481

Source: 2013-2017 American Community Survey 5-Year Estimates

Age of housing stock. According to the 2013-2017 American Community Survey, 36.6 percent of the building stock in Fredericksburg is fifty years old, built prior to 1969. The year range with the highest percentage was between 1970 and 1979, at 18.9 percent. The median year for all structures is 1977.

Exhibit II-25**Number and Percent of Housing Units by Construction Year, City of Fredericksburg, 2013-2017**

Construction Year	Estimate	Percent
1939 or earlier	1,768	15.3%
1940 to 1949	500	4.3%
1950 to 1959	770	6.7%
1960 to 1969	1,192	10.3%
1970 to 1979	2,185	18.9%
1980 to 1989	1,109	9.6%
1990 to 1999	1,174	10.2%
2000 to 2010	1,921	16.60%
2010 or later	926	8%
Total	11,545	100%

Source: 2013-2017 American Community Survey 5-Year Estimates

Housing Units in severely substandard condition. The following Exhibit II-26 outlines the number and percent of Fredericksburg housing units without complete plumbing or kitchen facilities from 2013-2017, as well as units with no telephone service available.

Exhibit II-26

Substandard Living Conditions, City of Fredericksburg, 2013-2017

Condition	Number of Units	Percent
Total number of occupied units	10,419	100%
Lacking complete plumbing	38	0.3%
Lacking complete kitchen facilities	115	1.1%
No telephone service available	129	1.2%

Source: 2013-2017 American Community Survey 5-Year Estimates

As seen in Exhibit II-26, only 0.3 percent and 1.1 percent of occupied units were without either complete plumbing or kitchen facilities, respectively. The American Community Survey also estimates that 253 households were using a nontraditional source of heat (kerosene, coal, coke, etc.) and that 38 households had no source of heating at all. This is a significant decrease from the 2006-2010 American Community Survey that stated there were 1,213 households using nontraditional methods or no sources of heat.

Subsidized housing units. There is no local public housing authority in Fredericksburg. There Virginia Housing Development Authority (VHDA) administers vouchers in areas of Virginia that do not have a local housing authority of 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.

Exhibit II-28 displays the locations of LIHTC and project based housing in Fredericksburg.

Exhibit II-27

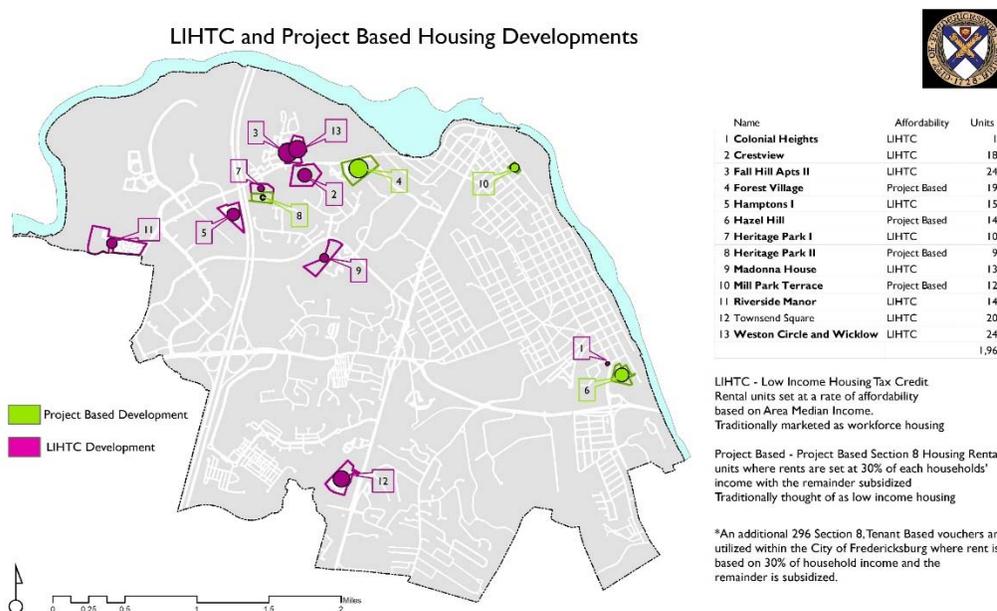
Subsidized Housing Units, City of Fredericksburg, 2017

Location	Type of Subsidy	Number of Units
Colonial Heights	LIHTC	14
Crestview	LIHTC	180
Fall Hall Apts II	LIHTC	246
Forest Village	Project Based	192
Hamptons I	LIHTC	150
Hazel Hill	Project Based	145
Heritage Park I	LIHTC	100
Heritage Park II	Project Based	96
Madonna House	LIHTC	130
Mill Park Terrace	Project Based	129
Riverside Manor	LIHTC	142
Townsquare	LIHTC	200
Weston Circle and Wicklow	LIHTC	245
Total		1,969

Source: City of Fredericksburg

Exhibit II-28

Map of LIHTC and Project Based Housing Developments, City of Fredericksburg



Source: The City of Fredericksburg, Department of Community Planning and Development, 2018

Section III.

Citizen and Key Person Feedback

This section of the AI summarizes the results of 75 completed internet surveys and seven key person interviews. Within this section, the responses from the internet survey will be used to compare the demographic, employment, and housing characteristics found in Section II.

Internet Survey

Beginning in October 2019, the team produced an internet survey for the residents of Fredericksburg to complete. This survey was posted on the Fredericksburg City website (<https://www.fredericksburgva.gov/917/Fair-Housing>) and was announced using social media, the local newspaper *The Free Lance Star*, and the City's various distribution lists. The survey was available for two weeks.

The total number of responses was 75 with a completion rate of 81.3 percent. The survey asked respondents about their personal, current housing characteristics, experience with housing discrimination, and their education related to housing discrimination. The education portion focused on their current knowledge of fair housing discrimination and awareness of existing housing assistance and social service programs. Surveys were conducted in English only.

Survey respondent characteristics. Respondents were distributed the survey through email lists, social media posts, and the local newspaper. There are similarities and differences between respondents' characteristics and the data obtained on Fredericksburg residents from the 2013-2015 American Community Survey 5-Year Estimates.

Tenure. As seen with Exhibit III-1, 71 percent of survey respondents were homeowners, which is higher than the 36 percent of housing units that were owner-occupied in Fredericksburg according to the 2013-2015 ACS report. A total of 29 percent of respondents were renters, compared to the 64 percent in the 2013-2015 ACS report for Fredericksburg. This could be because the majority of survey respondents were over the age of 34.

Exhibit III-1

Tenure of Survey Respondents and Residents, City of Fredericksburg

Respondents	Internet Survey		Fredericksburg Citizens, 2017	
Owner	50	71%	3,746	36%
Renter	20	29%	6,673	64%
Total	70	100%	10,419	100%

Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

Age. The age ranges in the survey were from 18 years of age to 65 and older. The age cohort with the most number of responses was the 45 to 54 age group, with a total of twenty respondents. The age group with the fewest responses was the 18 to 24 age group, with only 3 responses, even though this age cohort accounts for 19.7 percent of the population according to the 2013-2015 ACSC report.

Exhibit III-2

Age Distribution of Survey Respondents and Residents, City of Fredericksburg

Age Cohorts	Internet Survey		Fredericksburg Citizens, 2017	
18-24	3	4%	5,551	19%
25-34	12	18%	4,463	16%
35-44	16	23%	3,693	13%
45-54	20	28%	2,925	10%
54-63	10	14%	2,693	9%
64 and Older	9	13%	2,960	10%
Total	70	100%	22,285	77%

Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019, 2013-2017 American Community Survey 5-Year Estimates

Race and ethnicity. The majority of respondents identified themselves as White/Caucasian, with a total of 62 respondents. A total of 3 respondents identified themselves as Black/African American. The 2013-2015 ACS report said that the percentage of White/Caucasian residents was 60, while the percentage of Black/African American residents was 22. Exhibit III-3 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/Latino (of any race)

Exhibit III-3**Race and Ethnicity of Survey Respondents and Residents, City of Fredericksburg**

Race & Ethnicity	Internet Survey		Fredericksburg Citizens, 2017	
White/Caucasian	62	86%	16,882	60%
Black/African American	3	4%	5,992	21%
Hispanic/Latino	0	0%	3,010	11%
Asian	0	0%	675	2%
American Indian/ Alaskan Native	2	3%	0	0%
Hawaiian Native/ Pacific Islander	0	0%	28	0.1%
Other	4	6%	0	0%
Two or More	1	1%	1,548	6%
Total	72	100%	28,135	100%

Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019, 2013-2017 American Community Survey 5-Year Estimates

Household income. Of the 75 survey respondents, only 60 answered the question regarding their total yearly, household income. This means that for this question, 22 percent of respondents were unaccounted for in the following summary. Of the 60 respondents, 22 percent earn \$150,000 or more per year in their households, compared to 14.8 percent of households in Fredericksburg overall. Five respondents, or 8 percent, identified that they earn less than \$35,000 a year, compared to 19.5 percent of overall households in Fredericksburg. Conversely, 91 percent of respondents' households earned over \$35,000 a year, versus 80.5 percent of all Fredericksburg households. Exhibit III-4 displays the income distribution of survey respondents.

Exhibit III-4**Housing Income of Survey Respondents and Residents, City of Fredericksburg**

Yearly Income per Household	Internet Survey		Fredericksburg Citizens, 2017	
	Count	Percentage	Count	Percentage
Less than \$10,000	0	0%	843	8.1%
\$10,000 to \$14,999	1	1.7%	448	4.3%
\$15,000 to \$24,999	2	3.3%	739	7.1%
\$25,000 to \$34,999	3	5.0%	1,146	11%
\$35,000 to \$49,999	6	10.0%	1,385	13.3%
\$50,000 to \$74,999	7	11.7%	1,667	16%
\$75,000 to \$99,999	12	20.0%	1,406	13.5%
\$100,000 to \$149,999	16	26.7%	1,229	11.8%
\$150,000 and above	13	21.7%	1,541	14.8%

Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019, 2013-2017 American Community Survey 5-Year Estimates

Household characteristics. Exhibit III-5 displays the household characteristics of the survey respondents. The majority of respondents were married, at 60 percent of the total respondents. Eighteen respondents identified themselves as being single, at 25 percent of the total responses. Of the responses for the question pertaining to how many persons are within the household, 25 percent responded that there were two people. At 24 percent was the answer of only one person living in their household. Of the 35 respondents who answered yes to having children living with them, there were fourteen who answered yes to having children over the age of 18 living with them.

Exhibit III-5**Household Characteristics of Survey Respondents, City of Fredericksburg**

Response Choices	Number of Respondents	Percentage of Respondents
Married	42	59.2%
Single	19	26.8%
Domestic Partners	4	5.6%
Widowed	2	2.8%
Single mother (with children living at home)	4	5.6%
Single father (with children living at home)	0	0%
Total	71	100%
1 person	18	25.4%
2 persons	18	25.4%
3 to 4 persons	28	39.4%
5 or more persons	7	9.9%
Total	71	100%
No children	36	50.7%
1 child	14	19.7%
2 children	15	21.1%
3 children	3	4.2%
4 or more children	3	4.2%
Total	71	100%

Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

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.

Out of 61 responses, approximately 8 percent of respondents (a total of 5) had experienced some form of discrimination during the housing process; 6 percent of survey respondents (a total of 4) 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 14 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. Respondents were allowed to choose multiple answers on this question. The most common answer to this question was income, at 7 responses; however, income or a person’s ability to pay is not a protected class under the Fair Housing Act. The second most common answers were Race and Age, both with 5 responses. The reasons for discrimination reported by survey respondents are listed in Exhibit III-6.

Exhibit III-6

Survey Respondents’ Experience with Housing Discrimination, City of Fredericksburg



Source: Fredericksburg Internet Survey, “Analysis of Impediments Survey”, October-November, 2019

Note: Multiple answers were allowed.

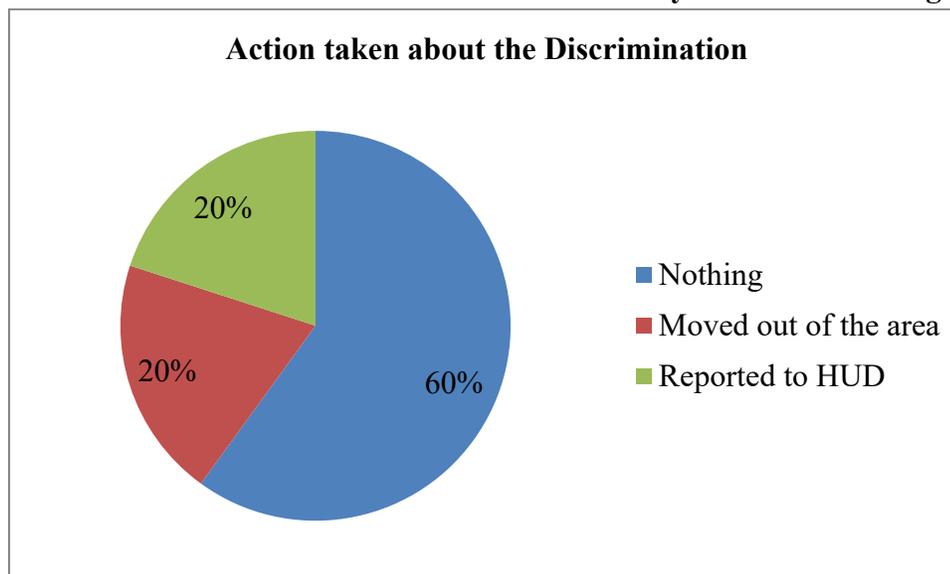
Of the 9 people who indicated they had been discriminated against or know someone who had been discriminated against, there were 8 who said that the discrimination occurred in Fredericksburg. The other respondent indicated that they had experienced housing discrimination in other parts of the Greater Fredericksburg Area.

The majority of the housing discrimination occurred when the respondents were looking to rent a housing unit.

Resolving housing discrimination. Survey respondents were asked a series of questions to identify how they would respond if they encountered housing discrimination. The 9 respondents who had experienced or knew someone who had experienced housing discrimination were asked what they did about the discrimination. As shown in Exhibit III-7 below, the majority of respondents did “nothing”.

Exhibit III-7

What Did You Do About the Discrimination? City of Fredericksburg



Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

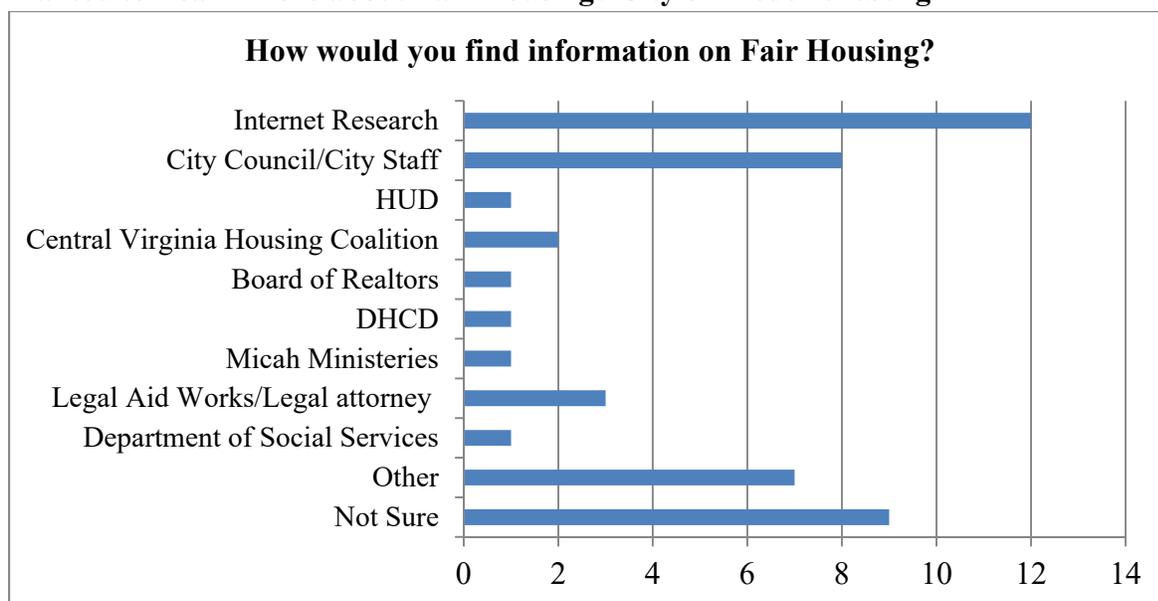
The survey asked specifically whom respondents would contact if they experienced housing discrimination, or where they would go to learn more about Fair Housing. Out of the 33 respondents who answered this question, seven respondents were unsure of where to find information regarding Fair Housing. Three respondents mentioned seeking legal aid in the form of a lawyer or going to Legal Aid Works. Nine respondents said they would seek help or information from a government official, including the City Manager, HUD officials, Social Services, or Congressmen.

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

- "I would contact the police."
- "I would do an internet search."
- "I would call 411 to ask."

Exhibit III-8

Whom Would You Contact If You Were Discriminated Against in Regards to Housing or Wanted to Learn More about Fair Housing? City of Fredericksburg



Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

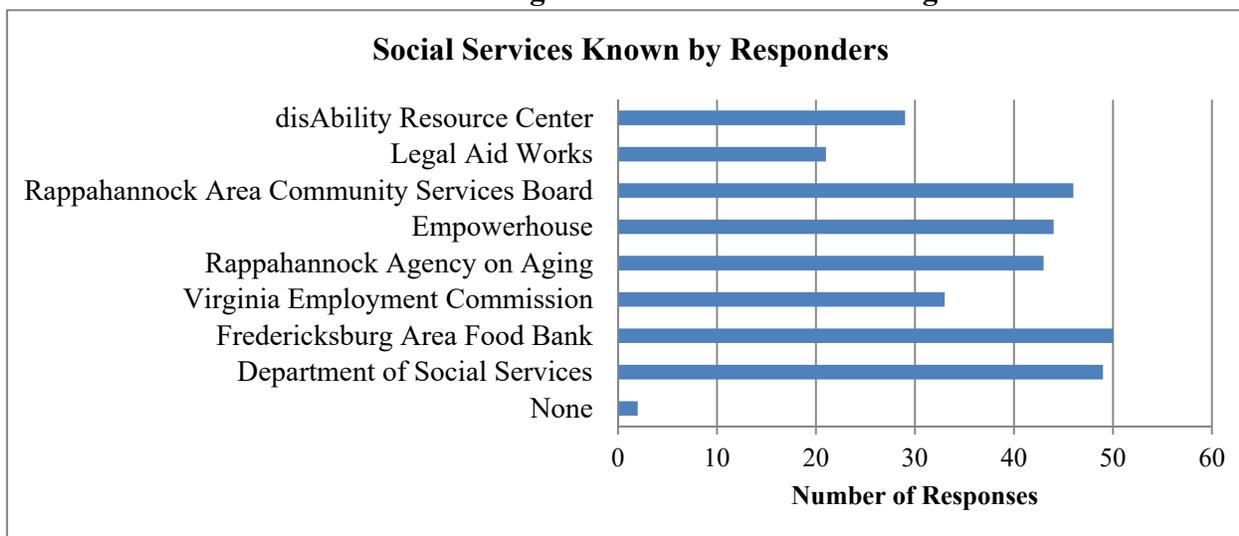
Note: Multiple answers were allowed.

Housing and social service needs. The survey also included several questions about the housing and social service needs of Fredericksburg residents. Out of 56 respondents to this question, three respondents indicated that they received assistance from social service departments. Two organizations were indicated to have helped respondents, the Rappahannock Community Services Board and the Federal Housing Administration.

Awareness of social service organizations. Survey respondents were asked about their awareness of several social service organizations in Fredericksburg. Out of the 57 respondents, approximately 87 percent knew about the Fredericksburg Area Food Bank and the Department of Social Services. Only 36 percent of respondents knew about Legal Aid Works, and the programs run by the City's Community Planning and Building Department was the least known resource to the respondents of the survey. Two respondents indicated that they did not know of any social services in Fredericksburg.

Exhibit III-10

Are You Aware of These Services/Organizations in Fredericksburg?



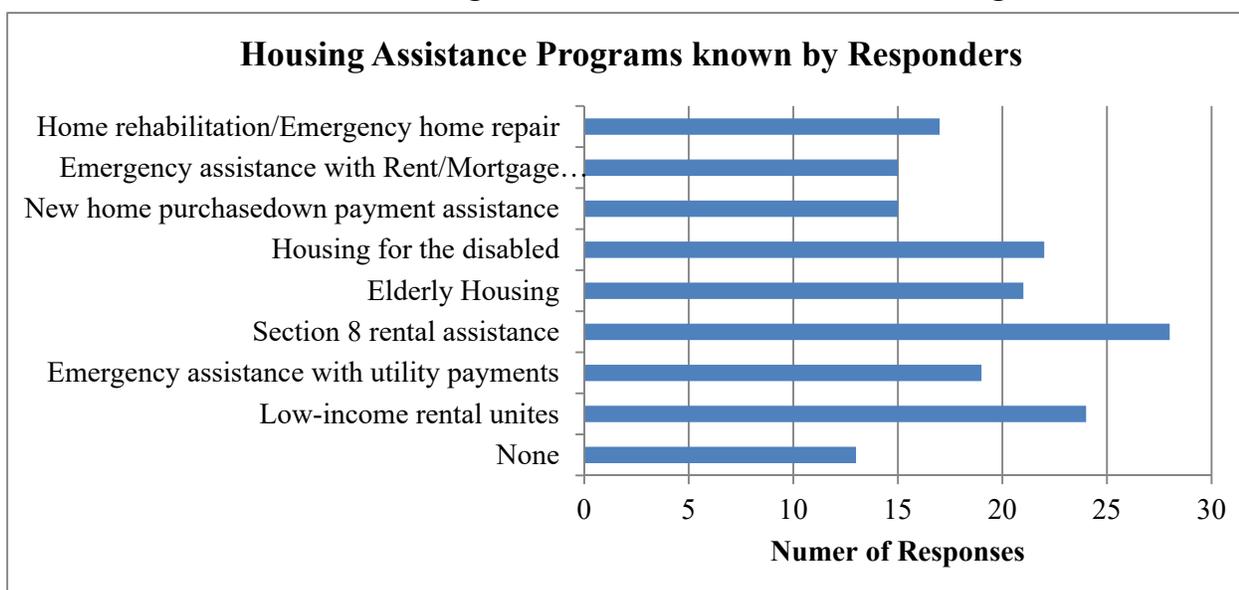
Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

Note: Multiple answers were allowed.

Awareness of housing assistance. Survey respondents were asked about their awareness about various types of housing assistance available to Fredericksburg residents. Out of 55 respondents, 67 percent were aware of the Section 8 Rental Assistance program, while 23 percent knew none of the housing assistance programs. Exhibit III-11 displays the survey responses.

Exhibit III-11

Are You Aware of These Housing Assistance Services in Fredericksburg?



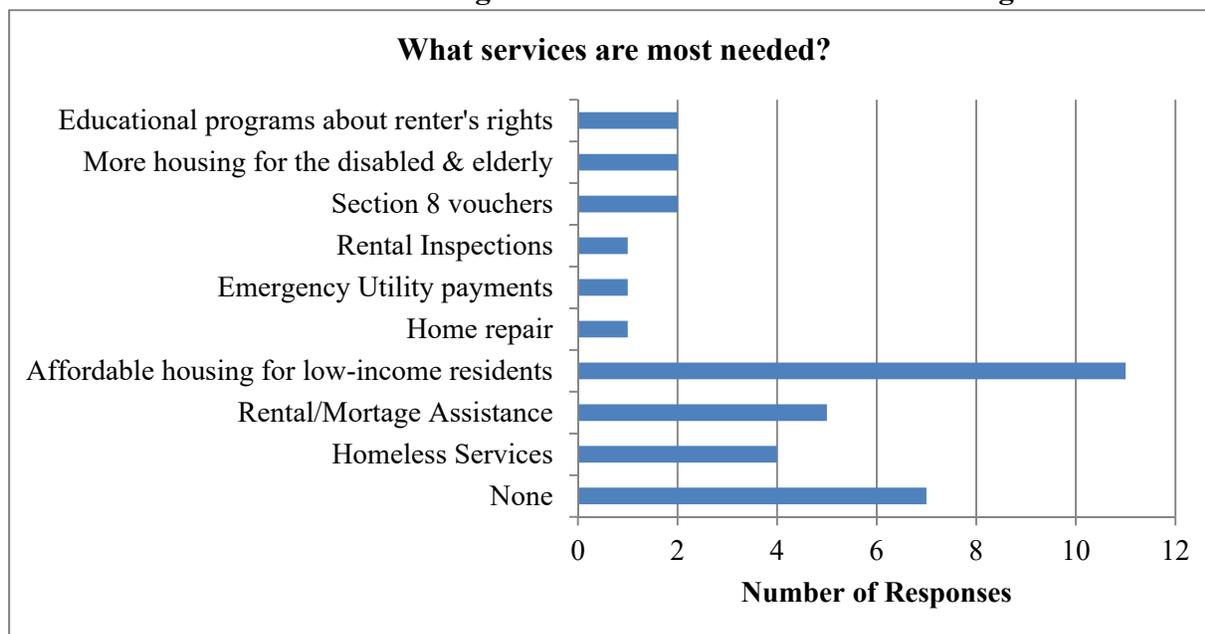
Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

Note: Multiple answers were allowed..

Top needs. Respondents were asked for their opinions about the top social services and housing assistance needs in Fredericksburg. The top three most common responses were: affordable living for low-income households, emergency assistance for rent payments, and programs to inspect the conditions of rental properties in low-income areas.

Exhibit III-12

What are the Most Needed Housing Assistance Services in Fredericksburg?



Source: Fredericksburg Internet Survey, "Analysis of Impediments Survey", October-November, 2019

Note: Multiple answers were allowed.

Key Person Interviews

During the months of fall of 2019 the team conducted eight key person interviews with individuals knowledgeable about fair housing issues and social service needs in the City of Fredericksburg. The following Exhibit lists the organizations with which in-person and email interviews were conducted for the AI.

Exhibit III-13

Agencies and Organizations Consulted

Central Virginia Housing Coalition
 City of Fredericksburg, Planning Staff
 Continuum of Care
 Department of Social Services
 disAbility Resource Center
 Fredericksburg Area Association of Realtors
 Legal Aid Works, Inc.
 Micah Ecumenical Ministries

Source: Thayer

The key person interviews were conducted to obtain input on fair housing impediments. Interviewees mentioned several housing and community development needs/concerns the City should examine to improve fair housing and affordable housing. Key themes that were present throughout the eight interviews were affordable housing development, transportation issues, and barriers low-income residents face against landlords. Their comments include the following:

Visible Issues

- Section 8 housing has a long waiting list, and currently applications for Section 8 vouchers are closed in the area. There is a need for more vouchers and an increase in the turnover rate for the vouchers.
- Affordability and accessibility of housing was the most mentioned issue from the interviews.
 - Fredericksburg workers have been pushed out of the City because they cannot afford rent and this forces them to a longer commute every day.
 - Low-income persons and those on Social Security incomes cannot afford to rent or live within the City.
 - There is a higher buyer and renter demand than supply of available housing.
 - “Affordable housing should be distributed across the City instead of just concentrated areas.”
 - “A person who earns minimum wage is unable to afford 99 percent of the housing units in the area.”
 - “Persons who are disabled and live on a fixed income cannot afford rent as it continues to increase.”
- The quality of low-income housing available has been brought up as a concern. The housing itself and low-income neighborhood access, mobility, and amenities should be upgraded.
- Concerns about gentrification of the area have been brought up; the increasing amount of Washington D.C. and Richmond workers moving to the City have raised prices of the

overall housing stock making it more difficult for lower-income persons to move back into or stay in their neighborhoods.

Barriers

- Fredericksburg has the highest average house price / rental rates and a very low median income.
- Transportation for those living within the City and outside of the City.
 - FRED Transit System no longer has routes to two of the surrounding counties.
 - Route 1 & 3 are large barriers to getting to work on time for those with and without personal vehicles.
 - Bike trails do not connect within the City to provide a comprehensive bike path for workers.
 - The walking trail system has not fully interconnected the city.
- Lack of or poor credit history may hinder a person's ability to rent.
- Lack of or poor rental histories discourage landlords to rent to certain persons.
- Constituents do not support affordable housing projects, making local officials less likely to support them as well
 - There is a "Not In My Backyard" (NIMBY-ism) reaction in the community to affordable housing or emergency shelters.
 - While homelessness is an issue that constituent recognize, there has been a push back to having a homeless shelter or affordable housing placed in their neighborhoods.
- 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.
 - "Especially if the mark on their record was a past eviction notice, even though Virginia has some of the highest eviction rates in the country."
- Restrictive zoning and few incentives for builders to build affordable housing.
 - Due to the limited number of affordable housing units, there is a higher demand than availability.
 - In order to increase density, zoning must be more flexible with infill and bedroom density restrictions.
 - "The City should provide more incentives for builders to be able to address the housing needs of lower income residents."

Discrimination

- Possible cases involving discrimination have evolved to discriminate in other ways that do not include the protected classes.

- Most interviewees responded that they did not know of specific cases of housing discrimination in Fredericksburg.
 - One interviewee responded that there was a case of a landlord rejecting a possible tenant because they “Did not rent to those sorts of people.” While it cannot be confirmed whether the landlord was discriminating against a protected class, a form of possible discrimination did occur.
- Housing vouchers for disabled persons are misunderstood and often confused for Section 8 housing vouchers.

Needs

- Community education about housing discrimination and housing assistance programs.
- More Section 8 vouchers and an increased turnover rate for those vouchers.
- Assistance for elderly or disabled persons with low income, along with Medicaid eligible people.
 - Low amount of education relating to disability and the struggles that are faced by disabled persons.
 - More ramps and handicapped bathrooms are needed throughout the community.
- Increase the supply of housing units available so that housing prices may be reduced.
- A public housing authority may be needed to promote fairness in renter-landlord agreements.
 - A rental housing inspection program.
 - More transitional housing programs.
- More inclusionary, intergenerational communities for those with disabilities or limited mobility.
- Increased advertisement or accessible knowledge about city run programs to help benefit low-income persons or those with disabilities stay in their homes within the city.
- Community improvements that help integrate a community into transportation systems or improve daily quality of life.

If unlimited funding were available

- Giving free representation for all tenants if there is a civil issue against a landlord, or a civil issue against the tenant.
- Community land trusts focused on making affordable units and keeping them affordable.
- Affordable units for seniors and those struggling with mental illness type disabilities that have a full time support system in the office of the units.
 - 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.
- Put funding into the community stock we have to make them livable for all types of people.
 - Workforce housing for firefighters, teachers, etc.
 - Keeping complexes in good repair.
- Build a multi-modal public transportation system around the housing stock in order to provide faster, safer transportation to those populations. Include better connections between communities and sidewalk and bicycle infrastructure.
- Additional funding for emergency assistance for those in need of housing, food, or medical care.
- Increased educational materials to enhance community support for programs such as the Rapid Rehousing and other social and housing services.
- Increase the amount of buses available for the FRED Transit System as well as increase the amount of neighborhoods and retail places the FRED Transit System makes stops at.
 - Implement a paratransit system for those whose residences are not on the Transit System.

Summary of Responses

The results from the key person interviews confirm that there is a need for more affordable housing units within the City and surrounding areas, particularly to accommodate households with low- to very-low incomes. While many needs identified by respondents are beyond the control of the City, such as the number of available Section 8 vouchers and instances of housing discrimination for characteristics not protected under Fair Housing (income level, criminal histories, etc.), other issues are being addressed with City supported programs. These programs include the Removal of Architectural Barriers program (installation of ramps and other features to promote independence), the Homeownership Assistance program (provides a down payment on a loan or mortgage for housing), and the funding of legal services to protect people against cases of fair housing discrimination (CDBG supported aid to Legal Aid Works services). The City should continue with its existing programs and consider new ways to encourage affordable housing within new developments, enhance the quality of life of and multi-modal connections to low income neighborhoods, direct people to existing educational programs offered by the Central Virginia Housing Coalition regarding homeownership and lending, and work with 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 to 2017 showed that all seven of the Fredericksburg banks listed on the CRA website (www.ffiec.gov/cra) received a satisfactory CRA rating. Further review of the 2019 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 the Virginia Department of Professional and Occupational Regulation and the HUD Philadelphia Regional Office.

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 (FHOO), and the Virginia Fair Housing Office (under the auspices of the Virginia Department of Professional and Occupational Regulation), and Legal Aid Works, Inc. (formerly known as Rappahannock Legal Services). If a person has experienced illegal housing discrimination, they have one year to register the complaint, however it is recommended they file the complaint as soon as possible.

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 investigation 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 (https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint), 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 Legal Aid Works (LAW). The City of Fredericksburg has contracted with LAW to conduct education, outreach, and enforcement of fair housing issues to the citizens of Fredericksburg.

Legal Aid Works is a non-profit corporation that provides free legal services in non-fee-generating civil matters to those who cannot afford an attorney. LAW is funded by the federal, state, and local governments and by a wide range of local individuals, agencies, and organizations. LAW has three offices located in Fredericksburg, Culpeper, and Tappahannock with 13 full time staff and 2 part time staff.

LAW 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.

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.

The Virginia Fair Housing Office provided the data regarding the number of complaints in Fredericksburg filed from January 1, 2010 to October 31, 2019 shown in the following Exhibit. The VFHO data only lists the reason for the complaint and the municipality that the complaint was filed in. Over the past decade, there have been 31 discrimination complaints filed under the basis of one of the protected classes.

Exhibit IV-1

Number of Complaints Filed with VFHO, City of Fredericksburg, 2010 to October 31, 2019

Reason for Complaint	Number of Complaints
Race	13
Religion	2
Sex	1
Disability	7
Familial Status	3
Nation of Origin	3
Elderliness	2
Total Complaints	31

Source: The Virginia Fair Housing Office, Fair Housing Docket Count by County, January 2010 to October 2019.

The HUD Philadelphia Regional Office was able to supply the data regarding the number of complaints in Fredericksburg filed from January 1, 2010 to November 19, 2019. This data describes 10 complaints; the date filed and date the case concluded, the reason for complaint, and the final outcome of the complaint.

Exhibit IV-2

Number and Year of Complaints filed with HUD, City of Fredericksburg, 2010 to November 19, 2019

Year Filed	Number of Complaints
2010	1
2011	0
2012	0
2013	4
2014	2
2015	2
2016	0
2017	0
2018	1
2019	0
Total Complaints	10

Source: HUD Philadelphia Regional Office, City of Fredericksburg, VA Report, January 1, 2010, to November 19, 2019

In the Exhibit below, it is shown what basis the complaints were filed under. One complaint had the reason as both sex and race, however for consistency it was only tallied under the sex category. The primary causes of complaints were race and disability, with three complaints each. There were no complaints filed with the reasoning of familial status or elderliness. 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-3**Number of Complaints filed with HUD, City of Fredericksburg, 2010 to November 19, 2019**

Reason for Complaint	Number of Complaints
Race	3
Religion	1
Sex	1
Disability	3
Familial Status	0
Nation of Origin	2
Elderliness	0
Total Complaints	10

Source: HUD Philadelphia Regional Office, City of Fredericksburg, VA Report, January 2010 to November 2019.

Exhibit IV-4 displays how the HUD complaints were closed. The most common types of closure were no cause determination and administrative closure, which happens if the complainant is uncooperative or there is a lack of jurisdiction. There have been a total of nine complaints closed, with the complaint filed in 2018 still ongoing. 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-4**Closure of the HUD Complaints, City of Fredericksburg, 2010 to November 19, 2019**

Closure Type	Number of Complaints Closed
No cause	3
Administrative closure	3
Conciliation/Settlement successful	2
Complaint withdrawn	1
Total Complaints Closed	9

Source: HUD Philadelphia Regional Office, City of Fredericksburg, VA Report, January 2010 to November 2019.

Exhibit IV-5 displays 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-5**Complaints Closure by Basis and Issues of Complaint, City of Fredericksburg, 2010 to November 19, 2019**Conciliated/Settled*Disability*

- Discriminatory refusal to rent and negotiate for rental.
- Failure to make reasonable accommodation.
- Discriminatory terms, conditions, privileges, or services and facilities.
- Discriminatory advertising, statements and notices.

No Cause*Race*

- Discrimination in terms, conditions, or privileges relating to rental.
- Discrimination in terms, conditions, privileges, or services and facilities.

Disability

- Failure to make reasonable accommodation.

Administrative Dismissal*Race*

- Discriminatory refusal to rent.

National Origin

- Discriminatory terms, conditions, privileges, or services and facilities.
- Discriminatory acts under Section 818 (coercion, etc.).

Sex

- Discriminatory advertising, statements and notices.
- Discriminatory terms, conditions, privileges, or services and facilities.
- Otherwise deny or make housing unavailable.
- Discriminatory acts under Section 818 (coercion, etc.).

Complaint Withdrawn*National Origin*

- Discriminatory refusal to rent.
- Discrimination in terms, conditions, privileges, or services and facilities.

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 Legal Aid Works 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 2010 to November 1, 2019.

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

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.

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 with preparing 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 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 Fredericksburg.

CVHC provides the same network/assistance of the voucher program for one 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.

Zoning and Land Use

The team reviewed the City of Fredericksburg's codes, Comprehensive Plan, planning fees and other City program and policies, in order 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 power 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 their 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 2017-2020 priorities. The City Council routinely develops long term priorities for the City to focus on. City Council develops these long term priorities in order to steer community focus on tasks that will improve the overall cohesive nature of Fredericksburg as an interconnected community. Task #4 is named "Distinct and Linked Neighborhoods" and includes priorities #12-15. At least one of these priorities focuses on identifying challenges to neighborhood livability and quality of life throughout the City. Task #8 is named "Public Services- The Backbone of our Community", and includes priorities #27-34, and at least one of these priorities is centered on working to reduce unsheltered homelessness and establish an affordable housing strategy.

While these priorities do not specify whether or not there is a focus on fair housing specifically, it may fall within these priorities. City Council phrases the tasks in a broader sense in order to allow the community to narrow in what is most needed at the time.

Consolidated Plan. The 2015 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 5,480 total households, both owners and renters. This figure includes the following income categories:

- Extremely low-income – 30 percent of area median income or below – 2,630 households
- Low-income – between 30 and 50 percent of area median income – 1,580 households
- Moderate-income – between 50 and 80 percent of area median income – 1,270 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 2017 American Community Survey data indicates that there are 10,419 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 Community Planning and Building 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 long-term city plans 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. The 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 that public decisions are made in accordance with adopted policies and objectives, and it serves as the City's blueprint to create an increasingly better, healthier, convenient, safe, and attractive community through intelligent foresight, administration and coordination.

The 2015 Comprehensive Plan for the City of Fredericksburg is framed around:

- Land Use Patterns and Planning
- Historic Preservation
- Transportation
- Public Services and Facilities
- Environmental Protection
- Residential Neighborhoods and Housing
- Institutional and Jurisdictional Partnerships
- Downtown
- Business Opportunities

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:
 - Maintain and expand the current bicycle and pedestrian facilities to create a connected network throughout the city in order to promote a safer way for pedestrians to move throughout the city.
 - Continue to expand the FRED system by adding capacity, where and when feasible, as well as by maintaining a Real Time Transit Information System.
- **Neighborhoods.** Policy statements:
 - Reestablish the pro-active rental property maintenance program to improve conditions in City neighborhoods and to address problems that create unsafe and unsanitary conditions for renters.
 - Actively pursue initiatives to develop housing opportunities for senior citizens and persons with disabilities.
 - Maintain the supply of affordable housing through appropriate community development programs that rehabilitate existing owner-occupied housing and improve the physical quality of housing and neighborhoods.
 - Ensure that persons with disabilities are able to find housing that is accessible and where they can obtain housing support, if needed.
 - Ensure neighborhood infrastructure needs continue to be met through the Capital Improvements Program.
- **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:
 - Establish and maintain connections between neighborhoods and the overall community, though multiple modes of transportation.
 - Allow for greater housing density when creating or redeveloping mixed-use neighborhoods.
 - Maintain the supply of affordable housing through appropriate community development programs that rehabilitate existing owner-occupied housing and improve the physical quality of housing and neighborhoods.
 - Ensure residential rental properties are properly maintained in a condition that is safe and sanitary, in accord with state and local regulations.
 - Provide options for citizens to age in place, through senior housing programs that help adapt houses to developing needs.

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,” which is adopted by the City Council.

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 regulation 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 for conventional development. The minimum lot area and minimum lot width standards are reduced for cluster development.

The Zoning code also allows for a mixture of residential dwellings, commercial, office, and services uses. The Planned Development-Resident (PD-R) and the 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.

The Planned Development Medical Center (PD-MC) also allows for specific types of residential development. These housing uses include housing for the elderly and persons with disabilities and home for adults, provided that the gross area for such housing does not exceed 15 percent of the total gross area of the PD-MC Districts. Dormitories and medical-related housing designed for staff and their families are allowed provided that the gross area for such uses does not exceed 10 percent of the gross area of the PD-MC Districts. Lastly, other residential uses are allowed up to eight units per acre, provided that the gross area of such uses does not exceed 10 percent of the total area of the PD-MC District.

Exhibit V-1**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-2)	2	15,000	Interior Lot: 100 Corner Lot: 125
Single-Family, detached (R-4)	4	7,500	Interior Lot: 60 Corner Lot: 75
Single-Family, detached & attached (R-8)	8	3,750	Interior Lot: 35 Corner Lot: 45
Single-Family, attached (R-12)	12	1,875	Interior Lot: 18 Corner Lot: 18
Multi-Family (R-12)	12	None	18
Single-Family, attached (R-16)	16	1,600	Interior Lot: 18 Corner Lot: 18
Multi-Family (R-16)	16	None	18
Single-Family, detached & attached (R-30)	30	1,600	Interior Lot: 18 Corner Lot: 18
Multi-Family (R-30)	30	None	18
Single-Family, detached & attached (C-T)	8	3,750	Interior Lot: 35 Corner Lot: 45
Single-Family, detached & attached (C-D)	12	None	None
Multi-Family (C-D)	18	None	None
Single-Family, attached (C-SC)	12	1,875	Interior Lot: 18 Corner Lot: 18
Multi-Family (C-SC)	12	None	18
Single-Family, attached (C-H)	12	1,875	Interior Lot: 18 Corner Lot: 18
Multi-Family (C-H)	12	None	18
Mixed Use (C-H)	12	None	None
Single-Family, detached & attached (PD-R)	8	See GDP or R-8	See GDP or R-8
Multi-Family (PD-R)	12	See GDP or R-12	See GDP or R-12
Single-Family, detached & 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
Multi-Family (PD-MC)	20	2,000	See GDP

Source: Code of Ordinances, City of Fredericksburg, VA. October 8, 2013.
GDP = Generalized Development Plan submitted with a rezoning request.

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.

In 2011, the City of Fredericksburg adjusted the setback regulations and lowered 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, locations 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 handicapped, or developmentally disabled persons resides 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 the Code of Virginia. The term "residential facility" is deemed to be any group home or other residential facility for which the Virginia Department of Behavioral Health & Developmental 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 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 several 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 the exercise and play areas.
- Increases a negative psychological effect on the occupants by reducing privacy.
- Increases physical and mental fatigue when performing routine household tasks.
- 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 handicapped, 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.

Real Estate Tax Exemption. The City of Fredericksburg has a real estate tax exemption program for the elderly and disabled in place. This program relieves the real estate tax, which is set by City Council each year, if the residents meet the requirements. These requirements are that the home must be the sole dwelling of the owner, the applicant must be aged 65 or older by June 30 or totally disabled, yearly income from all sources must not exceed \$50,000, and the total net worth of the home owner and spouse cannot exceed \$300,000 (the value of the house and lot is not included in this figure). Other qualifications may apply to the applicants.

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.

Buildings and Building Regulations. The Department of Community Planning and Building's Building Services Division 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 this division 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, or demolition.

While accessibility may not be an issue for new or recent construction because of the Building Services Division's enforcement of the Statewide Building Code, a large portion of the housing stock in Fredericksburg was built before current accessibility laws were enforced. Meaning, any construction after 1991 was not subject to the accessibility enforcement that current construction is subjected to by the Building Services Division.

The City of Fredericksburg 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, detailing 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 dwelling 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.

Property Maintenance Code

Rental Housing Inspections. The City implemented a Residential Rental Housing Inspection Program in January, 2007. Approximately 6,674 of occupied housing units in Fredericksburg are renter-occupied, which is the highest rate of renter occupied units compared to surrounding communities. This program was implemented by City Council as a way to protect the life, safety, and health of residential rental housing tenants, and to preserve neighborhoods in which residential rental housing is located.

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 could periodically re-inspect 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 and has revisited the issue multiple times.

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 2015 Comprehensive Plan Policy Framework states the following objectives 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 rent or purchase safe, decent, and accessible housing within their means. Policy statements include:

- Increase homeownership opportunities while also ensuring the City achieves an appropriate mix of housing choices (single-family homes, townhouses, loft apartments, accessory apartments, etc.).
- Maintain the supply of affordable housing through appropriate community development programs that rehabilitate existing owner-occupied housing and improve the physical quality of housing and neighborhoods.
- Ensure residential rental properties are properly maintained in a condition that is safe and sanitary, in accord with state and local regulations.
- Provide options for citizens to age in place, through senior housing programs that help adapt houses to developing needs.
- Ensure that persons with disabilities are able to find housing that is accessible and where they can obtain housing support, if needed.

Social Services Delivery. In 2015 the City added a land use classification to the Unified Development Ordinance. Social Services Delivery Use is defined as a use in which the principal function is to provide services including meals, care services, training, counseling, case management and other related services. Many residents and groups alike were concerned about the creation of this land use classification and had been cited as NIMBY-ism by those in favor of the land use. Supporters reviewed this in the context of the Americans with Disabilities Act and RLUIPA, as federal courts determined that some uses, such as the “social service delivery” use may constitute a “religious exercise of land” and that the clients of the social service delivery may or may not be disabled.

The amendment to the zoning code allows organizations to better facilitate services for those who may be a protected class to obtain and retain housing. In this way, this use advances efforts for fair housing.

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 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.

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”. Fifteen percent of the respondents to the internet survey indicated that they have experienced housing discrimination at some point, even if the discrimination did not occur in Fredericksburg. If this percentage is applied to the total population in Fredericksburg, it suggests that 4,220 persons 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 persons who claimed to have experienced discrimination, 77.7 percent said it was because of income or economic 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? Where would you go to learn more about fair housing?”, 24 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, at 60 percent.

Key persons interviewed for the AI expressed minimal concern about housing discrimination specifically, focusing more on income barriers and affordability. Certain stakeholders did bring up the idea that housing discrimination has become more difficult to identify, as landlords and rental managers have found other, non-protected reasons for refusing to rent to individuals that may fall in the protected class categories. 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 and citizens surveyed identified the lack of affordable housing in Fredericksburg as the biggest problem in the community. Interviewees indicated the restrictive zoning was the reason for lack of incentives to developers

to provide affordable housing. While residents would like to stay/live in Fredericksburg, added construction cost and the new development of “luxury” condos and apartments raise the cost of housing in the City, causing residents to move out as they are no longer able to afford to buy or rent a dwelling.

Affordable housing. There are 2,630 households that are categorized as extremely low income. The Housing Choice has a waiting list of X 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. 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 and survey data suggests that barriers do exist. The issue of disabled persons living on fixed income was brought up, and how when rents increase, those living on a fixed income experience problems paying for their rents. Organizations that assist persons with disabilities reported that there is a lack of accessible housing in the area and that rents for accessible units are not affordable to many in the disabled community.

When asked for their ideas on how to solve these issues, respondents answered that including more ramps, few stairs, and more accessible bathrooms are all needed throughout the community. By increasing these measures, it may promote more awareness (both housing needs and supportive service needs) of the disabled population within the area.

Transportation. Transportation was spoken about at every interview as a barrier to affordable housing. The current infrastructure has been said to not support the current populations in need of public transportation and those located in the affordable housing already in place. The FRED Transit System has decreased how far the routes go out in terms of the surrounding counties, which blocks those who have been pushed from the City, due to the rising rents, into the surrounding counties for more affordable housing. Those who have been pushed into King George and Caroline Counties now no longer have a public transportation system to take them to their jobs in the City. Even the routes in Stafford and Spotsylvania Counties have said to take up to two hours to complete, which vastly hinders the usefulness of these routes for those working.

Suggestions included trying to put more funding into the current FRED Transit System and provide more buses along one route in order to speed up the process from getting from one place to another. One interviewee suggested that the City and surrounding counties revisit the idea of the Fredericksburg Regional Transportation Alliance in order to pursue a regional transportation system that would better serve the greater Fredericksburg area. Continuing to better connect neighborhoods into the City’s bike and pedestrian infrastructure is also a priority.

Education. Lack of educational materials was brought up on several occasions, as well as the lack of knowing where the educational materials could be located. While there is a combined effort between the City and the organizations that work with at-risk populations to produce materials outlining the efforts being taken, certain interviewees and survey respondents admitted to not knowing where to find these materials. It was also brought up that the language used in these materials is not always the most accessible to those who may need to use them.

Respondents suggested that the materials be printed and placed in locations where an at-risk or in-need person may go to seek help. These places included the library, the Department of Social Services, City Hall, and on the University of Mary Washington campus. By placing printed materials around the City, it gives those without an internet connection a way to easily obtain the information.

Other instances where there was a lack of educational awareness of fair housing issues where when interviewees and survey takers were asked where they would go or send someone if they had faced housing discrimination. Key persons often said that they would send someone to Legal Aid Works or straight to the HUD website in order to file a complaint. However, there were some that were not quite sure where they would send someone asking for help or educational resources on the subject. A clearer, more concise way of telling social service organizations how to handle a fair housing complaint may be needed in the area.

NIMBY-ism. 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, accessible housing, and the placement of supportive services in Fredericksburg and the surrounding areas.

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 actions below for the future FHAP and Consolidated Plan.

Action Item 1. Raise the visibility and awareness 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 percent did not take action to obtain information or to report their situation. When asked “Whom would you contact if you experienced housing discrimination? Where would you go to find more information of fair housing?”, 24 percent did not know where to go to receive help or information.

A review of the City of Fredericksburg’s website found information that was recommended by the 2012 AI. A description of the CDBG programs, a definition of fair housing, and instructions

of filing a Fair Housing complaint are already included in the Planning and Community Development section of the City website (www.fredericksburgva.gov).

The City of Fredericksburg should also create a plan to raise the fair housing visibility of the area 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 or pamphlet to be placed near public use computers and in community gathering locations, such as the public library, along with computer rooms in housing developments. The targeted placements for these educational materials should be areas where publicly available activities occur, and in churches as they are hubs for social services for at-risk populations.

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 and while the City Council begins choosing the long term priorities for the next three years. City Council may find it appropriate to include more fair housing based priorities in the new set of long term goals. An examination of the proportion of units in the City that are affordable to lower income residents will assist in setting actual, attainable goals for increasing the amount and quality of affordable housing within the city. 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, due to the current policy of redirecting developers to the current Virginia state law of how many mandated units need to be implemented in new development. Another possibility is 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. Currently, the City is pursuing this avenue by distributing the Legal Aid Works' "Guide to Landlord-Tenant Law and Local Rental Housing in Planning District 16" to landlords annually.

One avenue is conducting 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. Have that person 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. An increased amount of awareness between departments in the City on who this point of contact is and how to reach them is also 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. These programs should also receive more visibility to the community in order to educate possible in-need homeowners what programs are available to them.

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) and accessibility in the city, such as walking and biking trails, 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 may 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 NIMBY-ism. 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.

When applications for new affordable housing are submitted for public review, the City should take initiative on public relation 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.

Action Item 7. Fair housing training and rental inspection programs. The Landlord Licensing program could be adjusted for modern landlord-tenant guidelines, and provide the needed education to landlords each year. In coordination with the annual licensing registration, landlords could be required to take a mandatory fair housing education class. The fees of which could be put towards rental inspections and other fair housing based programs.

Reinstate the systematic rental inspection program as it existed prior to July 1, 2010. The rental inspection program may work on an as-need basis from complaints and through regular inspections of rental properties within the city. This would push back against the unsafe conditions low-income or special-needs residents may face, and push to have their concerns heard and dealt with in timely manner.

Action Item 8. Work with the disAbility Resource Center on expanding landlord and tenant knowledge. The City should work closely with the disAbility Resource Center (DRC) to better educate disabled residents about their rights as renters and homeowners. Currently, there is confusion about how certain City run programs operate and who is eligible for these programs. The City should strive to partner with DRC in order to help educate at-risk residents about their rights and the programs that are available for both homeowners and renters.

Based on the HUD data about complaints over the last decade in Fredericksburg, disability related complaints focused on the failure to provide proper accommodations. Landlords and property managers may not fully understand their responsibilities to disabled residents, and neglect these aspects of the property. The City and DRC should collaborate on a way to better educate both residents and landlords on this requirement.

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 and 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 Legal Aid Works to update the “Guide to Virginia Landlord-Tenant Law and Local Rental Housing in Planning District 16”.

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 Legal Aid Works.