



Plan Year 2018-2022 Consolidated Plan

Plan Year 2018 One-Year Action Plan

Community and Housing Development Department

# Executive Summary

## ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

#### Overview

The City of Mobile's Consolidated Housing and Community Development Plan is a community-based plan addressing the City's housing, homelessness, and non-housing community development needs for the five-year period (2018-2022). The plan contains goals, measurable objectives, and implementation strategies for the plan's elements. Additionally, the plan contains a One-Year Action Plan describing the activities the City will fund, implement, or support the implementation of in 2018-2019.

The plan complies with Consolidated Plan regulations (24 CFR Part 91) issued by the U.S. Department of Housing and Urban Development. HUD requires entitlement communities such as the City of Mobile to consolidate its planning, application, and reporting requirements for most HUD programs, including the Community Development Block Grant (CDBG), HOME Investment Partnership Act, and Emergency Solutions Grant programs. This plan must be updated each year if necessary, adopted by the City Council and submitted to HUD prior to the beginning of the City's program year or within 60 days of the allocation of funds.

The 2018-2022 Consolidated Plan builds upon some existing plans adopted by the City Council. These include the 2013-2017 Consolidated Plan, Assessment of Fair Housing, New Mobile Plan, the Mobile Housing Boards Vision for revitalizing its aging neighborhoods, and The Continuum of Care (CoC) Ten Year Plan to Eliminate Homelessness.

The five-year plan has been developed by expanding outreach and collaborations established during the Assessment of Fair Housing process. The City of Mobile's Community and Housing Development Department consulted with the Mobile Housing Board, Mobile County, Mobile-Mobile County-Baldwin County Continuum of Care, AIDS Alabama South, and other City of Mobile Departments, including Build Mobile, Civic Engagement, and Procurement. It is divided into six elements: Executive summary, planning process, needs assessment, housing market analysis, strategic plan and first-year (2018-2019) Action Plan.

#### Neighborhood Revitalization Strategy Area (NRS)

As part of this plan, the City is designating a Neighborhood Revitalization Strategy Area in accordance with the terms of 24 CFR 91.215(e) (2) and CPD Notice 96-01. This area lies entirely within the HCD Plan and CDBG Target Area, and comprises those census tracts and neighborhoods where measures of income, employment, housing standards, abandoned and unmaintained vacant lots, public safety, Brownfield sites, and other neighborhood quality benchmarks lag behind city-wide averages. The City is

actively engaged within this area in creating partnerships with stakeholders in an attempt to create the conditions needed for wholesale neighborhood revitalization.

### **Priority Goals**

The City, in collaboration with community stakeholders, identified key goals as priorities in the Assessment of Fair Housing and Consolidated Plan. The specific goals identified as priorities are included in a separate section of this Consolidated Plan.

### **One-Year (2018-2019) Action Plan**

This section of the plan describes how 2018-2019 CDBG, ESG and HOME funds will be used during the year to address the City's housing, homelessness, and non-housing community development goals and objectives.

### **Adoption**

The City of Mobile's one-year Action Plan was approved by the Mobile City Council on April 25, 2018. The resolution adopting the plan is included as part of this plan. The Consolidated Plan is an administrative tool and was administratively accepted on this date as well.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The goals set forth in the Consolidated Plan are in direct alignment with the goals of the Assessment of Fair Housing (AFH). In addition to the goals identified in the AFH, the City also included a goal to provide assistance for the homeless or those at risk of becoming homeless. The following provides a description of each goal.

### **AFH - Fair Housing Awareness**

Increase community engagement related to fair housing awareness and planning. Planned activities include participating in fair housing month, community development week and actively encouragement in community planning activities.

### **AFH – Zoning Code Recommendations**

Recommend revisions to zoning code to increase access to affordable housing. Potential recommendations include provisions to incentivize affordable housing, strategies to eliminate barriers to the construction of affordable housing, reducing lot size minimums, and increased density limits.

### **AFH – Increase Coordination**

Increase coordination with City Departments and City/Regional Entities. Potential activities include programmatic opportunities to invest in historic properties, analyze underutilized and vacant city-owned land for affordable housing development opportunities, increase coordination with fair housing and community development activities.

#### **AFH – Access to high opportunity areas**

Provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and track affordable housing developments to inform planning efforts.

#### **AFH – Access to opportunities**

Reduce disparities in access to opportunities. Potential activities include workforce development and job training, improve access to transit, increase affordable housing near high-quality schools, and target Section 3 and women and minority-owned businesses for City contracts.

#### **AFH – Fair Housing Capacity**

Increase fair housing capacity in conjunction with the Center for Fair Housing. Planned activities include fair housing training sessions to increase fair housing awareness.

#### **AFH – Protected Classes**

Pursue practices to eliminate structural and individual bias towards members of protected classes. Potential activities include reviewing affirmatively fair marketing guidelines, analyzing listings for fair housing violations, and coordinating with Mobile Housing Board.

#### **AFH – Regional Coordination**

Improve regional coordination by establishing a regional fair housing working group.

#### **Homelessness**

Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.

### **3. Evaluation of past performance**



The City implemented some of its stated goals in the 2013 - 2017 Consolidated Plan. However, there are still several issues facing the City of Mobile. According to 2013 ACS data, the 2013 unemployment rate for Mobile residents over 16 years of age was 13.3%. There are 23,415 income earning households that rent in Mobile earning less than 100% AMI. Excluding zero-income renter households, 14,890, or 67% renter households are either cost burdened (>30%) or severely cost burdened (>50%). Those households earning 0-50% AMI are most likely to be paying more than 30% of household income towards housing costs; 79%, or 10,325 renter households with income are cost burdened or severely cost burdened.

The poverty level in the City of Mobile has increased to 23.1% in 2016 after remaining relatively unchanged from 1990 (21.2%) to 2000 (21.1%). There are 26 racially/ethnically-concentrated areas of poverty (R/ECAP) as identified by HUD in Mobile. R/ECAPs are areas with a non-white population of 50 percent and more than 40 percent of individuals living at or below the poverty level. Overall, these neighborhoods are also the neighborhoods that have the highest rates of blight and other housing problems.

The Mobile Housing Board currently has 3,346 people are on the waiting list for public housing units and housing choice vouchers.

The number of homeless individuals and families have decreased by 12% between 2016 and 2017, however this does not reflect those persons that are doubling up in housing or sleeping on couches (overcrowding). Veteran homelessness is at a very low level; Housing First Inc. has provided services for 225 veterans and their families in 2016, 84% of which obtained permanent housing. The combination of these trends and factors culminated in the City choosing its goals or projects.

#### **4. Summary of citizen participation process and consultation process**

##### **Assessment of Fair Housing**

The City of Mobile's Housing and Community Development Department used the AFH and Consolidated Plan to go engage the community in an array of activities, including a series of interviews, meetings, and a survey. These activities allowed the City to reach a diverse set of citizens by providing community members with a number of ways to provide additional data to inform the process. To inform this Consolidated Plan, 47 individuals from the general public and 24 organizations active in housing, community development, fair housing, and public service activities have been interviewed for the AFH. In addition to the three community and public meetings and 233 survey responses received through the AFH process, the City facilitated an additional three interactive community and public meetings during the Consolidated Plan process.

##### **Stakeholder Outreach**

In addition to the stakeholder outreach performed during the Assessment of Fair Housing process with, the City of Mobile consulted with leadership from the Continuum of Care, AIDS Alabama South, LLC, and

additional staff from the City of Mobile. These consultations garnered additional information on needs and strategies to address homelessness, HIV/AIDS, hazard mitigation, and access to broadband.

### **Community Meeting - December 7, 2018**

A Public Hearing was conducted by the City's Community & Housing Development Department inform community members and stakeholders of the Consolidated Plan and Program Year 2018 Action Plan process. The meeting took place at Mobile Government Plaza, located at 205 Government Street in Mobile, Alabama. In addition to providing information to the public on the process, the City's Community & Housing Development Department provided a draft Program Year 2018 Consolidated Formula Allocation for inspection and comment.

### **Community Meeting - January 24, 2018**

On January 24, 2018 and public meeting was held regarding the update to the City of Mobile's Consolidated Plan. The meeting was held at 10:00am in the Ben May Main Library, an ADA-accessible public building located at 701 Government Street, Mobile, Alabama, 36602. The purpose of this public meeting was to educate the public on the plan process, review preliminary findings and gather input regarding the goals and strategies of the plan. During the first part of the meeting, the consolidated plan process was reviewed with the participants including integration with the Assessment of Fair Housing and specific details on the contents of the Consolidated Plan. Following that, initial progress on data analysis for the consolidated plan was shared based on the needs assessment, market analysis, homeless information and a brief summary of the approved City of Mobile Assessment of Fair Housing.

## **5. Summary of public comments**

During the public hearings there was an open discussion about City programs and eligibility criteria. There were also many questions about the general budget process and how different program worked. One formal comment was received from Restore Mobile requesting that the City not overlay additional requirements onto programs beyond those required by HUD and that they be considered should funding become available for housing development and rehab.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

There were no comments rejected. The City will consider all viable developers, such as Restore Mobile, as funding becomes available and proposals are received.

## **7. Summary**

As a part of a larger strategy to invest in Mobile, the City of Mobile's Neighborhood Development Department is focused on administering programs that provide residents with the financial assistance to

purchase homes, encourage the rehabilitation of homes and buildings, address blight, and provide services for low-income and homeless residents.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	MOBILE	
CDBG Administrator	MOBILE	Community and Housing Development Department
HOPWA Administrator		
HOME Administrator	MOBILE	Community and Housing Development Department
ESG Administrator	MOBILE	Community and Housing Development Department
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

### Narrative

The City of Mobile's Neighborhood Development Department is responsible for preparing the Consolidated Plan and associated reporting requirements. James Roberts III, Senior Director, oversees the day-to-day administration of the Neighborhood Development Department which includes the Community and Housing Development Department, Municipal Enforcement, and the Neighborhood Task Force. Beverly Reed, Assistant Director of Community and Housing Development, is responsible for directing staff within the Community and Housing Development and ensuring that HUD regulations are adhered to with regards to CDBG, HOME, and ESG. Christopher McGadney, Program Analyst, administers the City's HOME funded down payment assistance program and manages the City's CDBG and ESG subrecipient contracts. Gordon Bauer, Program Analyst, processes all environmental reviews and eligibility determinations while also managing the City's CDBG Blight removal programs and serving as a backup to Chris McGadney for down payment assistance and subrecipient contracts.

### Consolidated Plan Public Contact Information

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Gordon Bauer, Program Analyst: (251) 208-6297 or email: [gordon.bauer@cityofmobile.org](mailto:gordon.bauer@cityofmobile.org)

## **PR-10 Consultation - 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Mobile's Community and Housing Development Department (CHD) incorporated data and feedback from stakeholders, residents, and other agencies and departments to inform the Consolidated Plan. In addition to in-person interviews and public meetings, CHD also consulted current planning efforts throughout the community to align strategies and identify opportunities to build on existing investments and programs. CHD will continue to collaborate with Mobile Housing Board, Mobile County, Mobile-Mobile County-Baldwin County Continuum of Care, AIDS Alabama South, and other City of Mobile Departments, including Build Mobile, Civic Engagement, and Procurement to drive strategic investment throughout Mobile.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

Throughout the Assessment of Fair Housing and Consolidated Plan process, the City of Mobile's Neighborhood Development Department consulted with the Mobile Housing Board, Mobile County, Mobile-Mobile County-Baldwin County Continuum of Care, AIDS Alabama South, and other City of Mobile Departments, including Build Mobile, Civic Engagement, Procurement, and Engineering.

The Neighborhood Development Department coordinated with the above organizations and departments to identify local housing, economic development, community development, public health, infrastructure (including access to broadband internet), hazard mitigation, and emergency management needs.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The City works in collaboration with Mobile Housing Board, and Continuum of Care Agencies, nonprofit and for profit assisted housing developers, Mobile County Health Department, University of South Alabama Hospital, AltaPoint Mental Health Systems, and subrecipient agencies through community planning process, and funding. The City provides CDBG, HOME and ESG funds to some of these agencies, including Annual Performance Contract funds.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City is an equal partner in the City of Mobile, Mobile County, and Baldwin County Continuum of Care (CoC) organization and is represented on the Board. The City also participates in the CoC's planning process and activities designed to end homelessness within ten years. The City provided a planning grant to the lead agency annually prior to the lead agency requesting that their application be withdrawn in PY 2017 due to their identifying other funds available for this purpose. This City continues to work with other CoC member organizations to implement and ensure compliance with the Homeless Management Information System (HMIS). The City is collaborating with the CoC agencies to address the need for permanent housing for homeless persons, chronically homeless persons, and those at risk of becoming homeless.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	AIDS ALABAMA
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
2	<b>Agency/Group/Organization</b>	Bishop State College
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Education
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
3	<b>Agency/Group/Organization</b>	Center for Fair Housing, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Fair Housing



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
4	<b>Agency/Group/Organization</b>	City of Mobile Advisory Commission on Disabled
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
5	<b>Agency/Group/Organization</b>	City of Mobile - Architecture Engineering
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Floodplain Management
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
6	<b>Agency/Group/Organization</b>	Community Foundation of South Alabama
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Veterans Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
7	<b>Agency/Group/Organization</b>	Habitat for Humanity of Southwest Alabama
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
8	<b>Agency/Group/Organization</b>	Housing First, Inc
	<b>Agency/Group/Organization Type</b>	Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.

9	<b>Agency/Group/Organization</b>	INDEPENDENT LIVING CENTER OF MOBILE
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
10	<b>Agency/Group/Organization</b>	Mobile Area Association of Realtors
	<b>Agency/Group/Organization Type</b>	Housing Real Estate Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
11	<b>Agency/Group/Organization</b>	Mobile County Government
	<b>Agency/Group/Organization Type</b>	Housing Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
12	<b>Agency/Group/Organization</b>	Mobile Housing Board
	<b>Agency/Group/Organization Type</b>	PHA Services - Housing Services-Children Services-Elderly Persons Services-Employment Resident Board
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Economic Development Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
13	<b>Agency/Group/Organization</b>	DUMAS WESLEY DBA SYBIL SMITH FAMILY VILLAGE
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
14	<b>Agency/Group/Organization</b>	UNITED METHODIST INNER CITY MISSION
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Elderly Persons Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
15	<b>Agency/Group/Organization</b>	United Way of SW AL
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
16	<b>Agency/Group/Organization</b>	MOBILE VOLUNTEERS OF AMERICA HOME DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
17	<b>Agency/Group/Organization</b>	WAVE Transit
	<b>Agency/Group/Organization Type</b>	Regional organization Transit
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted to provide qualitative and quantitative data for the Assessment of Fair Housing and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City of Mobile consulted all agencies that it felt would be impacted by the goals and activities in the Consolidated Plan.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Housing First, Inc.	The City cooperates with Mobile County and Baldwin County on the homelessness planning process and related program implementation. The Continuum of Care (CoC) represents the City of Mobile, Mobile and Baldwin Counties and small jurisdictions within them.
Assessment of Fair Housing	City of Mobile Community and Housing Development	The strategic plan was directly informed by the goals outlined in the Assessment of Fair Housing which was approved in 2017 and have been included as goals for the Consolidated Plan.
New Mobile Plan	City of Mobile Planning and Development Department	The strategic plan goals to increase access to high opportunity areas and opportunities, create and maintain decent housing, create a suitable living environment, and provide quality public services align directly with the 7 principles of Map for Mobile which was drafted in late 2015.1. Strong Neighborhoods 2. Functional Roadway Corridors3. Strategic Infill and Redevelopment4. A Connected Community5. High-quality Design of the Built Environment6. A Strong Downtown7. Greater Opportunities to Enjoy Natural and Recreational AssetsThe Future Land Use Plan and Major Street Plan was completed in mid-2017.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Choice Neighborhood Plans	Mobile Housing Board and U.S. Department of Housing and Urban Development	The strategic plan goals associated with public housing were informed by the goals of the Thomas James Place   Southside Choice Neighborhoods Plan. The plan outlines the following goals: Neighborhood " safe, populated with new residents as well as old, new businesses and jobs, better connected to regional assets People " healthy, educated, focused on youth, empowered and employed Housing " new, mixed-income developments with housing that respects the neighborhood fabric A draft of the plan was submitted and approved by HUD in late 2016. The strategic plan goals associated with public housing were informed by the goals of the Roger Williams Homes   Three Mile Trace Choice Neighborhood Plan. The plan outlines the following goals. 1. Achieve Individual Health and Wellbeing 2. Concentrate on Education 3. Realize a Safe Place to Live and Raise Children 4. Attract More Residents into the Neighborhood 5. Promote Economic and Business Development 6. Celebrate Diversity 7. Honor History and Culture 8. Attain Maximum Connectivity A draft of the plan was submitted and approved by HUD in late 2016.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City cooperates with the Alabama Department of Economic and Community Affairs (ADECA) through review of the State ESG and Low-Income Housing Tax Credit allocations and application requirements. The City cooperates with Mobile County and Baldwin County on the homelessness planning process and related program implementation. Mobile County represents several smaller units of governments and was given opportunity to provide comment on the plan. The Continuum of Care (CoC) represents the City of Mobile, Mobile and Baldwin Counties and small jurisdictions within them.

**Narrative (optional):**



## **PR-15 Citizen Participation**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of Mobile's Housing and Community Development Department used the AFH and Consolidated Plan to go engage the community in an array of activities, including a series of interviews, meetings, and a survey. These activities allowed the City to reach a diverse set of citizens by providing community members with a number of ways to provide additional data to inform the process. To inform this Consolidated Plan, 47 individuals from the general public and 24 organizations active in housing, community development, fair housing, and public service activities have been interviewed for the AFH. In addition to the three community and public meetings and 233 survey responses received through the AFH process, the City facilitated an additional three interactive community and public meetings during the Consolidated Plan process.

As noted above, the City of Mobile's Housing and Community Development Department built on the community engagement activities of the Assessment of Fair Housing to gather additional information and further understand the community development needs in and around Mobile, Alabama. The information gathered through stakeholder outreach and public meetings provided important qualitative data and directly informed the goal-setting for the Consolidated Plan. Community engagement activities provided additional information on the need for quality affordable housing and insight into organizational capacity and community development needs.

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Stakeholder Interviews	Community Development Practitioners	A series of stakeholder interviews were conducted with 37 individuals representing 19 organizations who are active in housing, community development, fair housing, and public service activities in Mobile and the region. These interviews were held in person and via phone from May 25, 2017 through June 29, 2017.	Please see summary of comments attached.	N/A	
2	Public Meeting	Non-targeted/broad community	Community Meeting June 22, 2017 The City of Mobile hosted a community meeting to provide residents with an overview of the Assessment of Fair Housing process, initial findings, and current initiatives. The community was also asked to provide feedback on the initial data analysis and ask questions.	Please see summary of comments attached.	N/A	
3	Public Meeting	Non-targeted/broad community	Community Meeting July 13, 2017 The City of Mobile hosted a community meeting at Government Plaza to provide an overview of the Assessment of Fair Housing document and specifically fair housing goals and strategies.	Please see summary of comments attached.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Newspaper Ad	Non-targeted/broad community	Community Meeting July 27, 2017 The City of Mobile hosted a community meeting at the Ben May Library to provide an overview of the Assessment of Fair Housing document and specifically fair housing goals and strategies.	Please see summary of comments attached.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Stakeholder Interviews	Non-targeted/broad community	<p>A survey was created and distributed to stakeholders and community members that were either unable to attend the scheduled community meeting or to provide another method of feedback. The survey was available online and paper copies were printed and available for community members that did not have computer access or preferred to complete the survey on paper. Additionally, a Spanish language version was distributed by the Providence/Outreach Guadalupe Center and made available at the Community meeting on June 19, 2017. The survey was conducted from June 13, 2017 through June 27, 2017 and received a total of 233 responses. The City of Mobile distributed the survey via email through City of Mobile lists from previous planning processes, to the City of Mobile Comprehensive Plan stakeholder list, and to the Mobile Housing Board. In addition to the efforts of the City, the survey was sent to local stakeholders to forward to their distribution networks.</p>	Please see survey results attached.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Stakeholder Interviews	Residents of Public and Assisted Housing	A stakeholder meeting was conducted with a group from the Mobile Housing Resident Advisory Board on June 13, 2017. With the assistance of leadership at the Mobile Housing Board, the team met with 13 resident leaders from 9 housing developments at the Renaissance Community Center at 600 Joachim Street in Orange Grove Homes.	The residents identified challenges and concerns from the quality of Mobile Housing Board units to access to education. The Advisory Board comments were very similar to other stakeholder comments which are attached.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Hearing	Non-targeted/broad community	<p>A Public Hearing was conducted by the Mobile Community &amp; Housing Development Department inform community members and stakeholders of the Consolidated Plan and Program Year 2018 Action Plan process. The meeting took place at Mobile Government Plaza, located at 205 Government Street in Mobile, Alabama. In addition to providing information to the public on the process, the City's Community &amp; Housing Development Department provided a draft Program Year 2018 Consolidated Formula Allocation for inspection and comment.</p>	Please see attached responses.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/broad community	On January 24, 2018 and public meeting was held regarding the update to the City of Mobile Consolidated Plan. The purpose of this public meeting was to educate the public on the plan process, review preliminary findings and gather input regarding the goals and strategies of the plan. During the first part of the meeting, the consolidated plan process was reviewed with the participants including integration with the Assessment of Fair Housing and specific details on the contents of the Consolidated Plan. Following that, initial progress on data analysis for the consolidated plan was shared based on the needs assessment, market analysis, homeless information and a brief summary of the approved City of Mobile Assessment of Fair Housing.	Please see attached responses.	N/A	
9	Public Meeting	Non-targeted/broad community  Non-profit service providers	On December 13, 2017 the Community and Housing Development Department held a technical assistance workshop for its 2018-2019 CDBG/ESG Application for any non-profit or individual that wished to learn more about the process and to explain the application in general.	While there were many questions related to specific application sections, there were no comments received.	N/A	

**Table 4 – Citizen Participation Outreach**



# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The needs assessment examines needs related to affordable housing, special needs housing, community development, and homelessness in Mobile, Alabama. The Needs Assessment includes the following sections:

- Housing Needs Assessment (NA-10)
- Disproportionately Greater Need (NA-15)
- Disproportionate Greater Need (NA-20-30) – (Addressed in AFH Section V)
- Public Housing (NA-35)
- Homeless Needs Assessment (NA-40)
- Non-Homeless Special Needs Assessment (NA-45)
- Non-Housing Community Development Needs (NA-50)

The Needs Assessment identifies needs and aids in prioritizing those needs which will form the basis for the Strategic Plan section as well as the programs and projects to be administered. Most of the data in this section is populated using default data from the 2009-2013 American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) datasets. The ACS and the CHAS datasets are both developed by the Census Bureau, with the CHAS dataset being developed specifically for HUD and its partners.

The housing portion of the Needs Assessment focuses largely on households experiencing a housing problem. There are four types of housing problems as defined by HUD:

1. Lacking complete kitchen facilities  
A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator  
Housing unit complete plumbing facilities  
Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower  
Cost burden greater than 30% of household income  
For renters: Housing costs include rent paid by the tenant plus utilities  
For owners: Housing costs include mortgage payments, taxes, insurance, and utilities  
More than one person per room (overcrowding)  
Not including bathrooms, porches, foyers, halls, or half-rooms

The Needs Assessment is tied closely to Federal community development entitlement programs. These programs have income limits which are established by HUD. These limits are based on the area median income (AMI) and are adjusted when considering family size. Generally, when speaking about income brackets for these programs, there are three categories:

- Very-low income – less than or equal to 30% AMI
- Low-income – 31-50% AMI
- Moderate-income – 51-80% AMI

The CDBG and HOME programs target low-income and moderate-income beneficiaries. With the caveat that HOME rental activities may include beneficiaries with income of up to 60% AMI. ESG activities are assumed to benefit only low-income and moderate-income persons.

<b>Persons in Family</b>	<b>30% AMI</b>	<b>50% AMI</b>	<b>80% AMI</b>
1	\$12,060	\$19,300	\$30,900
2	\$16,240	\$22,050	\$35,300
3	\$20,420	\$24,800	\$39,700
4	\$24,600	\$27,550	\$44,100
5	\$28,780	\$29,800	\$47,650
6	\$32,000	\$32,000	\$51,200

**Table 5 - HUD income limits for Mobile, AL for 2017**

## **NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)**

### **Summary of Housing Needs**

Just under half of all households in Mobile live above 100% of area median household income, while 42% of Mobile households live with incomes below 80% of the median. Of all Mobile households:

- 14.7% are very-low-income (<30% median household income)
- 12.5% are low income (30-50% median household income)
- 14.7% are moderate-income (50-80% median household income)

Just over 41% of all households in Mobile are small family households, consisting of two to four members. Of all small family households, 39% earn less than 80% of the household median income. There are 10,451 households (13.7% of all households) in Mobile that have one or more children six years old or younger. Of those households with a child six or younger, 62% earn less than 80% of the area median household income.

### **Housing Needs Summary Tables**

There are 23,415 income earning households that rent in Mobile earning less than 100% AMI. Excluding zero-income renter households, 14,890, or 67% renter households are either cost burdened (>30%) or severely cost burdened (>50%). Those households earning 0-50% AMI are most likely to be paying more than 30% of household income towards housing costs; 79%, or 10,325 renter households with income are cost burdened or severely cost burdened.

There are 15,105 income earning households that own their home in Mobile, earning less than 100% AMI. Excluding zero-income households, 8,170, or 54% of owner households earning less than 100% AMI are cost burdened or severely cost burdened. There are 6,855 (45%) of owner households with income earning 0-80% AMI that are cost burdened or severely cost burdened.

There are 10,400 renter households earning less than 100% AMI and have one or more of the four housing problems at the severe level. These 10,400 households represent 45% of all renter households with income earning less than 100% AMI. There are 4,825 owner households with income earning less than 100% AMI, these households make up 32% of all owner households with income earning less than 100% AMI.

### **Renter Households**

Of the 20,250 renter households earning less than 80% AMI, 14,740 (73%) households spend at least 30% on housing costs each month. Small related households make up 43% of all cost burdened households earning 80% or less AMI, while the “Other” category makes up 36%. The “Other” category

consists of single person households and households that are comprised of unrelated individuals living together.

Of the 20,250 renter households earning less than 80% AMI, 45%, or 9,025 spend more than 50% of their household income each month on housing costs. The trend at the severe cost burden level aligns with the trend at the 30% cost burden level; small related family households and single person/unrelated households make up 79% of all severely cost burdened households making less than 80% AMI.

**Owner Households**

Of the 11,785 owner households earning less than 80% AMI, 59%, or 6,957 households spend at least 30% on housing costs each month. When looking only at owner households at the 30% cost burden level earning less than 80% AMI, elderly households make up 38% of the total while small family households make up 38% as well.

Of the 11,785 owner households making less than 80% AMI, 37%, or 4,369 spend more than 50% of their household income each month on housing costs. Severely cost burdened owner households are mostly small related households (36%) or elderly (35%).

Demographics	Base Year: 2000	Most Recent Year: 2013	% Change
Population	199,552	195,116	-2%
Households	86,453	76,321	-12%
Median Income	\$31,445.00	\$38,644.00	23%

**Table 6 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

**Number of Households Table**

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	11,250	9,535	11,245	6,955	37,330
Small Family Households	4,230	3,525	4,530	2,280	16,865
Large Family Households	855	420	825	580	2,790
Household contains at least one person 62-74 years of age	1,519	1,925	2,239	1,370	7,670
Household contains at least one person age 75 or older	1,069	1,555	1,850	975	4,110

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Households with one or more children 6 years old or younger	2,883	1,715	1,895	1,149	2,809

**Table 7 - Total Households Table**

Data Source: 2009-2013 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	225	75	130	45	475	50	0	10	4	64
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	165	10	65	40	280	0	4	25	0	29
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	170	160	200	85	615	55	20	79	10	164
Housing cost burden greater than 50% of income (and none of the above problems)	4,665	3,295	660	40	8,660	1,860	1,215	1,230	270	4,575
Housing cost burden greater than 30% of income (and none of the above problems)	635	1,730	3,060	805	6,230	305	740	1,505	1,045	3,595

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	1,275	0	0	0	1,275	470	0	0	0	470

**Table 8 – Housing Problems Table**

Data 2009-2013 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	5,230	3,540	1,060	210	10,040	1,960	1,235	1,345	285	4,825
Having none of four housing problems	1,675	2,675	4,795	2,955	12,100	640	2,085	4,050	3,505	10,280
Household has negative income, but none of the other housing problems	1,275	0	0	0	1,275	470	0	0	0	470

**Table 9 – Housing Problems 2**

Data 2009-2013 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	2,525	2,225	1,595	6,345	680	565	1,380	2,625
Large Related	495	155	305	955	154	45	114	313
Elderly	825	795	585	2,205	859	945	860	2,664

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	1,820	1,970	1,445	5,235	555	405	395	1,355
Total need by income	5,665	5,145	3,930	14,740	2,248	1,960	2,749	6,957

**Table 10 – Cost Burden > 30%**

Data 2009-2013 CHAS  
Source:

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	2,320	1,300	185	3,805	625	380	560	1,565
Large Related	470	125	20	615	150	30	65	245
Elderly	595	520	190	1,305	614	520	405	1,539
Other	1,625	1,405	270	3,300	540	285	195	1,020
Total need by income	5,010	3,350	665	9,025	1,929	1,215	1,225	4,369

**Table 11 – Cost Burden > 50%**

Data 2009-2013 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	305	89	165	40	599	55	10	60	10	135
Multiple, unrelated family households	30	89	90	85	294	0	14	44	0	58
Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	335	178	270	125	908	55	24	104	10	193

**Table 12 – Crowding Information – 1/2**

Data 2009-2013 CHAS  
Source:



	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 13 – Crowding Information – 2/2**

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

Tables 9 and 10 above outline cost burden issues faced by single person households. The “Other” category is comprised of both single person households as well as unrelated persons living in the same household. Census data from 2013 indicates Mobile had 30,081 “Other” households, and of those, 86% were householders living alone. That 86% share of single-person households across Mobile will be applied to the “Other” category above to determine single person household needs.

Applying the 86% share to the 10,910 “Other” households, we calculate that there are 9,383 single person households that face a cost burden of either >30% or >50%. Most single person households facing a cost burden are renter households. Of all cost burdened or severely cost burdened single person households, 63% are renter households earning less than 50% AMI. This data indicates that the highest need for housing assistance towards single person households are renters earning less than 50% AMI.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Of the families in need of housing assistance, it is estimated that approximately 36.5% have a disability. This estimate is based on data for the state of Alabama provided by the U.S. Census Bureau in the American Community Survey Brief, Disability Characteristics of Income-Based Government Assistance Recipients in the United States: 2011.

**What are the most common housing problems?**

The most common housing problem facing both renters and owners in Mobile is cost burden. There are 37,245 households in Mobile with income, earning less than 100% AMI; 62% of those households are either cost burdened or severely cost burdened. There are 9,825 (26% of all households earning less than 100% AMI) households earning less than 100% AMI that pay more than 30% of their household income towards housing expenses, and there are 12,235 (36% of all households earning less than 100% AMI) households with income less than 100% AMI that pay more than 50% of their household incomes towards housing expenses.

## **Are any populations/household types more affected than others by these problems?**

Renter households with income less than 100% AMI are the most impacted group when considering cost burden. Of renter households earning less than 100% AMI, 67% are cost burdened or severely cost burdened. Specifically, 28% of renter households are cost burdened at the 30% level while 39% are cost burdened at the 50% level.

Further analysis shows that 61% of renter households earning less than 50% of AMI pay more than 50% of their household income towards housing expenses. This is indicative of a lack of affordable housing options for those households earning less than 50% AMI. The data also shows that 75% of renter households earning less than 80% AMI pay more than 30% of their household income towards housing expenses. This further shows a lack of affordable housing for very-low, low, and moderate-income renter households with income.

Black/African American households face the problems identified above in much greater proportions. This is most likely due to an income disparity that exists between households of different races. In 2013, of all Black households, 60% earned less than \$35,000 (median income in Mobile is \$38,644) while 61% of White households earn more than \$40,000 per year (both values in 2013 dollars). This disparity in income is exacerbated by the segregation of communities as identified in the AFH. Historically, this geographic segregation has isolated most economic gains away from neighborhoods where the majority of households are non-White. This is evidenced by a sustained disproportionate number of Black households accounting for incomes below the median income between 2009 and 2016.

This disparity in income highlights the need for investment in communities that are predominately low earning Black or immigrant households. As captured in the AFH, stakeholders in Mobile have identified that Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) are comprised of predominately low-income Black households. Further, most acreage in R/ECAPs are zoned for single-family homes, while another significant portion is zoned as I-2 heavy industry. These zoning classifications have presented problems for low-income families to find housing that is both affordable and free from potential environmental toxins generated by industrial uses.

## **Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The greatest challenges facing low-income individuals and households with children who are at risk of either residing in shelters or becoming unsheltered aligns with the needs of formerly homeless families who are nearing the termination of rapid re-housing and other assistance.

For both of these sub-populations, the challenges include lack of safe, affordable housing within the City. As noted in the Consolidated Plan and in the AFH, the City has a limited supply of affordable housing available to these populations. This need is exacerbated by lack of affordable housing that is close to job centers, schools and other community resources. Further, there are limited jobs available in the City for individuals with limited education experience, which comprises much of the low income population.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The City of Mobile does not maintain a methodology for estimating the number of at-risk individuals and households within the City.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

In Mobile, cost burden, specifically severe cost burden has been most linked with instability and an increased risk of homelessness.

**Discussion**

Affordable housing is the primary housing issue for the City of Mobile. An upward trend in rental prices and housing values will continue to strain the budget of many residents, increasing the risk of losing homes or being forced out of unaffordable rental units. This situation is especially challenging for individuals and families experiencing homelessness; increased housing costs with minimal opportunities for wage growth present barriers to entering a stable housing situation.

The most critical aspect of alleviating this issue of cost burden will be investing in affordable housing units; both in a generation of new units as well as in the protection of existing ones. The most affected households dealing with cost burden and severe cost burden are those renter households that earn less than 80% of AMI. To best serve this group, it will be important to pair rental assistance with wrap-around services to provide stability and help households maintain affordable housing.

Per HUD guidance, all Consolidated Plan submitted after January 1, 2018, must address broadband needs within the jurisdiction. Below is a map outlining Mobile and the region's access to providers offering broadband services. The speeds identified are 25Mbps download and 3Mbps upload – the minimum speeds to be considered broadband.

Downtown Mobile and East of the Interstate, overall have fewer options when considering broadband services, while there are still pockets of limited access West of the City in the suburbs. Most of the R/ECAP census tracts identified in 2010 also only have access to one broadband provider. It is also

important to consider the cost of the equipment needed to access the opportunities broadband may bring. Despite some areas having access to multiple broadband providers, there is still need for support in acquiring access to the machines and equipment that broadband functions upon.

According to the table above, Mobile is ahead of the national average and outperforming cities of similar populations in Alabama. Lack of broadband provider competition leaves room for market rigidity – allowing providers to not offer affordable options for low or moderate-income families. Ultimately, the lack of market options when considering broadband access disproportionately impacts low- and moderate-income households because they often have few financial resources to spend on what may be deemed non-essentials, such as broadband services.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,135	1,380	1,745
White	1,905	415	555
Black / African American	5,835	895	1,100
Asian	90	0	50
American Indian, Alaska Native	20	0	10
Pacific Islander	4	0	0
Hispanic	155	44	14

**Table 14 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2009-2013 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,250	2,285	0
White	2,450	875	0
Black / African American	4,505	1,405	0
Asian	130	0	0
American Indian, Alaska Native	40	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	100	4	0

**Table 15 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2009-2013 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,965	4,290	0
White	2,485	1,955	0
Black / African American	4,040	2,180	0
Asian	110	25	0
American Indian, Alaska Native	40	10	0
Pacific Islander	0	0	0
Hispanic	245	70	0

**Table 16 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2009-2013 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,340	4,615	0
White	1,020	1,955	0
Black / African American	1,270	2,380	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	0	115	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	35	125	0

**Table 17 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2009-2013 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Discussion

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205

### (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

#### Introduction

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

#### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,190	2,315	1,745
White	1,790	535	555
Black / African American	5,025	1,705	1,100
Asian	90	0	50
American Indian, Alaska Native	10	10	10
Pacific Islander	4	0	0
Hispanic	155	44	14

**Table 18 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2009-2013 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

#### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,775	4,760	0
White	1,735	1,595	0
Black / African American	2,870	3,045	0
Asian	70	60	0



<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	65	40	0

**Table 19 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2009-2013 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,405	8,845	0
White	1,065	3,375	0
Black / African American	1,230	4,985	0
Asian	50	85	0
American Indian, Alaska Native	0	50	0
Pacific Islander	0	0	0
Hispanic	30	290	0

**Table 20 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2009-2013 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 80%-100% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	495	6,460	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
White	175	2,800	0
Black / African American	305	3,350	0
Asian	0	115	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	20	145	0

**Table 21 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2009-2013 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

## Discussion

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	47,055	13,225	14,180	1,875
White	26,920	5,125	4,915	585
Black / African American	18,215	7,435	8,600	1,205
Asian	525	180	170	50
American Indian, Alaska Native	80	65	50	10
Pacific Islander	0	0	4	0
Hispanic	865	370	275	14

**Table 22 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2009-2013 CHAS

### Discussion:

### **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

**If they have needs not identified above, what are those needs?**

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

## NA-35 Public Housing – 91.205(b)

### Introduction

The Mobile Housing Board (MHB), the housing authority for the City of Mobile, serves 3,636 residents in 1,806 public housing units and 3,989 households through the Housing Choice Voucher program. The majority (96%) of residents residing in public housing and vouchers are Black/African American. As noted in the Assessment of Fair Housing, the majority of public housing units in Mobile are located in predominately Black neighborhoods that are within R/ECAPs in eastern Mobile. The percentage of Housing Choice Vouchers within a Census tract is correlated to the demographics of the tract. The Census tracts with the highest percentage of voucher units tend to be located along the outskirts of the city and in predominately Black Census tracts. The average annual income of residents served by the MHB is \$11,435 for public housing and \$12,322 for Housing Choice Vouchers. Both figures are near the FY 2017 extremely low-income limit of \$12,060 established by HUD for Mobile County.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	2,161	3,396	0	3,322	20	14	23

**Table 23 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	9,125	9,553	0	9,517	6,790	9,080
Average length of stay	0	0	8	5	0	5	0	8
Average Household size	0	0	2	2	0	2	1	4
# Homeless at admission	0	0	0	174	0	170	2	1
# of Elderly Program Participants (>62)	0	0	697	247	0	244	0	0
# of Disabled Families	0	0	311	694	0	658	8	4
# of Families requesting accessibility features	0	0	2,161	3,396	0	3,322	20	14
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 24 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	94	201	0	192	4	0	3
Black/African American	0	0	2,060	3,191	0	3,126	16	14	20
Asian	0	0	2	4	0	4	0	0	0
American Indian/Alaska Native	0	0	4	0	0	0	0	0	0
Pacific Islander	0	0	1	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 25 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	7	3	0	3	0	0	0
Not Hispanic	0	0	2,154	3,393	0	3,319	20	14	23

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 26 – Ethnicity of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)



## **Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

There is a need for accessible units in public housing developments and in the housing choice voucher program. The Mobile Housing Board has 200 accessible units, which is approximately 11% of the total units, and 5 requests for accessibility features in the public housing units. Of the 2,370 households that are on the waiting list for public housing units, 135 identify as disabled, which account for 67.5% of accessible units. There are 1,065 disabled families living in Housing Choice Voucher and an additional 53 households that are on the waiting list for Housing Choice Vouchers.

### **Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

One of the most immediate needs for low-income residents of Mobile access to high-quality affordable housing. The waiting list for public housing units is 2,370 households, of which 57% need 2- and 3-bedroom units.

There is a waiting list of 976 for Housing Choice Vouchers (HCV) which provide a wider variety of bedroom sizes. Households on the waiting list are overwhelmingly extremely low-income (83%), Black/African American (88%) families.

Outlined in the Assessment of Fair Housing, access to opportunity is a major need for residents of publicly funded housing. Public housing units are predominately located in high poverty areas with limited access to jobs, transportation, and quality schools. HCV recipients as a whole are located in areas throughout the city, however many of the units available are located in segregated neighborhoods that lack access to opportunities. There is a need for updated housing units, better transit, blight remediation, investment in infrastructure, and access to education and jobs for the residents of public housing and HCV participants.

Additionally, the number of available public housing units has declined due to the planned demolition of Roger Williams Homes, a 452-unit development, under a combination of the Rental Assistance Demonstration (RAD) program and HUD's traditional Section 18 Demolition and Disposition program. This demolition is scheduled to be completed in May 2018. This same site was the subject of a Choice Neighborhoods Planning grant. Through the planning and interaction done within the CNI planning a number of units are planned to replace the public housing units that are being demolished on site.

### **How do these needs compare to the housing needs of the population at large**

#### **Discussion**

N/A

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

Mobile is part of a three jurisdiction Coordinated Entry system; City of Mobile, Mobile County, and Baldwin County. Housing First, Inc. and AltaPoint operate in all three jurisdictions, while all other service providers operate within their own geography. The coordinated entry system takes 2-3 weeks to place individuals and households in rapid rehousing if units are available. However, identifying available units can take much longer.

The primary drivers of homelessness in Mobile are stagnation/decreasing wages combined with a lack of affordable housing options. Without a high functioning transit system, these two problems are siloed and exacerbated, resulting in higher pressure on organizations and facilities providing services for homeless and chronically homeless individuals and families.

Mobile’s plan to end homelessness is led by Housing First, Inc., a non-profit agency delivering case management services as well as providing housing. The table below describes the nature and extent of homeless in Mobile.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	444	9	453	387	415	140
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	2,633	827	3,460	1,649	1,586	131
Chronically Homeless Individuals	447	132	579	153	161	923
Chronically Homeless Families	0	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Veterans	311	101	0	0	0	0
Unaccompanied Child	0	9	9	0	0	0
Persons with HIV	40	13	0	0	0	0

**Table 27 - Homeless Needs Assessment**

**Data Source Comments:**

Indicate if the homeless population is: Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

See above table

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The number of homeless individuals and families decreased by 12% between 2016 and 2017, however this does not reflect those persons that are doubling up in housing or sleeping on couches (overcrowding). Veteran homelessness is at a very low level; Housing First Inc. has provided services for 225 veterans and their families in 2016, 84% of which obtained permanent housing.

Families with children are represented in public housing (42.2%) and project based section 8 (45.8%) in comparison to the demographics of Mobile (43.3%). Housing Choice Vouchers (HCV) are primarily families with children (67.9%) that serve families of all sizes: 58.9% of the units in HCV are 3+ bedrooms. Families with children represent 66.5% of HCVs being used in R/ECAPs and 68.2% in non R/ECAP areas. Less than 1% of residents in other HUD Multifamily are households with children, as the units are primarily for the elderly and persons with disabilities.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Between 10/1/2015 and 9/30/2016, the Mobile Coordinated Entry system provided services to 5,577 clients. Black or African Americans make up 60% of all clients served and White clients make up 34% of those served.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The majority of families throughout the CoC experiencing homelessness on any given night are sheltered. While Veteran homelessness is low overall, Veterans are unsheltered at a very high rate with

about one third of homeless veterans on any given night being unsheltered. This high unsheltered rate also affects persons with HIV and chronically homeless individuals. When looking at the two categories in their respective whole, each have unsheltered rates of approximately 30%.

The Mobile County School Board estimates that approximately 6,100 students in the County are homeless as defined by the Department of Education, which includes youth who “lack a fixed, regular, and nighttime residence.” This is approximately 10% of the students attending school in Mobile County. These numbers are not necessarily captured in the homelessness data available. It is also important to note that doubling up and sleeping on couches is not captured in homelessness data, but rather within the overcrowding numbers.

**Discussion:**

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The Non-Homeless Special Needs Assessment is focused on describing the special needs population in Mobile. This analysis is focused on persons with disabilities, the elderly and residents with HIV/AIDS.

### **Describe the characteristics of special needs populations in your community:**

#### **Persons with disabilities**

Access to high-quality affordable housing is a need throughout Mobile and, in particular, for those with disabilities. Approximately 15% of the non-institutionalized civilian population has a disability and nearly 43% of those over the age of 65 have a disability according to the 2009-2013 American Community Survey 5-Year Estimates. For those residents, there are options for in-home or community-based supportive services throughout Mobile. However, many persons with disabilities are very low income and cannot afford even a modest fee. This group relies on Medicaid Vouchers, which consistently has a waiting list over 3,000, to cover the cost of care.

#### **The Elderly**

The elderly population in Mobile have similar needs to persons with disabilities or are disabled. Approximately 15% of the noninstitutionalized population is 65 years of age or older and 43% of those over the age of 65 have a disability according to the 2009-2013 American Community Survey 5-Year Estimates. For those residents, access to quality, accessible, and affordable housing in areas of opportunity, that are close to services and transportation are limited. Specifically, low-income families and individuals who own their homes and need assistance with repairs and/or modifications to support aging in place have a difficult time accessing resources.

This need is compounded by the age of Mobile's housing stock, approximately 46% of which was built before 1970. The age of housing and limited resources for homeowners and landlords to modify homes has created a need in the community for accessible housing.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Beyond the need for quality affordable housing and access to transportation, persons with disabilities and the elderly are in need of accessible housing, access to affordable healthcare and other social services. Throughout the Assessment of Fair Housing and Consolidated Plan process, stakeholders identified the need for greater access to Federal programs such as Medicaid to assist residents with

disabilities. These programs provide low income persons with disabilities and their families with affordable options for housing, health care and other activities such as job programs.

Stakeholders also identified similar needs for those with HIV/AIDS. Many of these individuals and their families are in need of affordable housing and access to affordable medical care and social services. In particular, there is a need for housing and support services for female heads of household with HIV/AIDS.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

The City of Mobile is not a HOPWA Grantee, however there is a need for services for those with HIV and AIDS. According to the Alabama Department of Health, there were approximately 1,928 people living with HIV in Mobile County as of December 31, 2016. This is approximately 0.5% of the population in comparison to 13,680 or 0.3% throughout the state of Alabama. HIV and AIDS has had the greatest impact on the African American community throughout the state and in the region. Approximately 72% of persons living with HIV/AIDS in Mobile County are African American.

**Discussion:**

The City of Mobile has made strides to improve government infrastructure and support services that provide support to the elderly and persons with disabilities. However, there is still a great need for affordable housing and transportation for these residents and those with HIV/AIDS. As Federal resources have declined, it has become more challenging to meet the needs of Mobile residents with special needs.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

To inform the Assessment of Fair Housing and Consolidated Plan process, the City of Mobile conducted a survey of stakeholders and community members to identify community needs and priorities. In addition to housing, approximately 60% of respondents categorized community/neighborhood services and facilities as high need.

### **How were these needs determined?**

As a part of the Consolidated Planning process, a Community Needs Assessment survey was created and distributed to stakeholders and community members. The vast majority of respondents found that the City has a “high need” for community/neighborhood services, community/neighborhood facilities, economic development, and infrastructure.

### **Describe the jurisdiction’s need for Public Improvements:**

Throughout the process, stakeholders identified aging and inadequate infrastructure as a challenge for Mobile. Outside of basic infrastructure maintenance and improvements for sewer, roads, and parks, there is also a need for additional regional transportation infrastructure.

The City of Mobile has developed a three-year Capital Improvement Program to begin addressing the \$250 million backlog of infrastructure repair/upgrade needs throughout Mobile. The City will spend a total of \$63 million on improvements from 2016 to 2018, a sharp increase from the \$15 million that was spent from 2010 to 2015. The Community Housing and Development Department seeks to build on these investments and fund housing and community development programs that leverage capital improvement spending to increase access to opportunity and address blight.

- Snapshot of 2016-2018 Capital Improvement Program:
- Roadway Resurfacing, Striping and Reconstruction - \$14,934,118
- Storm water Management and Drainage Projects - \$13,374,000
- Parks and Recreation Facility Repairs and Improvements - \$12,590,728
- Sidewalk Repair and New Installations - \$5,086,071
- Traffic and Signal System Improvements - \$5,304,061
- Facility Repairs and Improvements - \$4,893,001
- Assessments, Program Management, and Contingencies - \$4,543,021
- MAWSS Joint Projects - \$1,350,000
- Bridge, Culvert, and Guardrail Repair - \$925,000



### **How were these needs determined?**

The City of Mobile identified a \$250 million backlog of infrastructure needs through the development of the three-year Capital Improvement Plan. Stakeholder interviews also identified the needs for major infrastructure improvements, including improving transportation infrastructure, improving the accessibility of roadways and sidewalks for pedestrians and persons with disabilities.

### **Describe the jurisdiction’s need for Public Services:**

More than half of respondents to the Community Needs Assessment survey found that the city is in “high need” of every type of public service in the list provided. The only exception was homebuyer education, which only 48% of respondents thought the city had high need.

In stakeholder interviews, many felt Mobile needs additional mental health and addiction services. One stakeholder in particular mentioned that the community is still struggling to identify the severity of the problem and there is a dire need for additional access to treatment, medication, and corresponding services. Stakeholders also identified the need for programs and activities to engage youth, a community-based police force and environmental protection for all Mobilians.

### **How were these needs determined?**

As a part of the Assessment of Fair Housing and Consolidated Planning process, a Community Needs Assessment survey was created and distributed to stakeholders and community members. Stakeholder interviews were also conducted, and focused on identifying Mobile’s community development assets, challenges, and needs, current impediments to fair housing and potential actions to address impediments.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

Mobile has seen a steady but small increase in its housing stock since 2009. The number of housing units increased from 89,123 units in 2009 to 89,998 in 2013, this growth rate has continued over the past five years. This small increase in the City of Mobile reflects a trend also seen in Mobile County, the County seeing a similar small increase over the same period. Vacancy rates in the County have remained relatively steady during this period at approximately 15%.

Much of the affordable housing for low and moderate-income households is made available through public and nonprofit ownership, and through subsequent rental assistance programs. Mobile has 1,806 units of public housing in use and 3,989 vouchers in use available through federal support.

The average rent in Mobile is unaffordable to many renter households because 42% of all Mobile residents earn less than 80% HAMFI, and 79% of renter households put more than 30% of their monthly income towards housing costs. Affordable rents are more likely to be in older buildings and have units with fewer bedrooms; these issues increase the likelihood of renters being exposed to lead-based paint hazards, less desirable regions of the city, as well as overcrowding.

The following is a brief overview of the market analysis results. More details are included within each corresponding section.

- According to 2013 ACS data, Mobile has 89,998 housing units. Single family homes account for 69% of Mobile's housing stock while the next largest portion, structures with 5-19 units, make up 13%.
- According to 2013 ACS data, the median rental rate in Mobile is \$576. This represents a 50% increase since 2000.
- Between 2000 and 2013, the median home value in Mobile has risen by 55%, going from \$80,400 in 2000 to \$124,300 in 2013.
- 72% of owner-occupied units and 68% of renter-occupied units were built before 1980 giving way to risk for lead-based paint issues.
- HUD's Office of Multifamily Housing Programs conducts physical inspection scores for all HUD related multifamily projects. Mobile's average inspection score is 87.5, reflecting quality maintenance upkeep of the housing stock.
- Mobile offers a wide range of housing and service options to its homeless population, including: emergency shelter, transitional housing, permanent supportive housing, affordable medication services, and nutrition/hygiene access.

- Mobile residents with special needs have access to services and support throughout the region. However, the demand for accessible affordable housing, affordable healthcare, and other services outweighs the supply.
- The largest barriers to affordable housing are historic development patterns rooted in segregation and the lack of private and public investment in many predominately African American neighborhoods. The lack of ongoing maintenance and investment in the Public Housing stock has exacerbated the need for affordable multi-family developments. Traditionally, multi-family housing has been difficult to develop due to zoning policies and community opposition. The City of Mobile is currently working to address policy driven barriers to affordable housing by updating the zoning code, supporting the redevelopment of public housing units, and investing in affordable housing throughout Mobile.
- According to 2013 ACS data, the 2013 unemployment rate for Mobile residents over 16 years of age was 13.3%
- With the recent addition of a Walmart distribution center, an Amazon sortation center, and an Airbus manufacturing plant, Mobile's economic environment has increased its available opportunities for workers with and without a college education.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

Most of Mobile’s housing stock is single-family detached homes, followed up by 5-19 unit structures. These two categories account for 82% of Mobile’s housing stock.

A majority of Mobile’s housing stock has three or more bedrooms, these units accounting for 63% of all housing units in Mobile and 85% of all units occupied by an owner. This large difference between 1-bedroom and 2-bedroom units when comparing renters versus owners could indicate that the supply of rental units with three or more bedrooms does not meet the demand of families. This could be supported by evidence that households that rent experience overcrowding and severe overcrowding at much higher rates than households that own (see table 7 in NA-10).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	62,165	69%
1-unit, attached structure	1,494	2%
2-4 units	7,054	8%
5-19 units	11,827	13%
20 or more units	5,997	7%
Mobile Home, boat, RV, van, etc	1,461	2%
<b>Total</b>	<b>89,998</b>	<b>100%</b>

**Table 28 – Residential Properties by Unit Number**

Data Source: 2009-2013 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	27	0%	1,026	3%
1 bedroom	420	1%	8,008	25%
2 bedrooms	6,026	14%	12,851	39%
3 or more bedrooms	37,174	85%	10,789	33%
<b>Total</b>	<b>43,647</b>	<b>100%</b>	<b>32,674</b>	<b>100%</b>

**Table 29 – Unit Size by Tenure**

Data Source: 2009-2013 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

There are 38,902 low income LIHTC units in Mobile according to HUD's LIHTC Database. These units serve households that with less than 60% area median gross income.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Of the 38,902 LIHTC units in Mobile, 215 units will meet the 30-year benchmark for affordability in 2019. Within the next 10 years, an additional 383 units will hit the 30-year benchmark. As outlined in the goals and strategies in the Assessment of Fair Housing, the City of Mobile will establish a database of affordable housing developments by the end of 2018 to monitor the number of affordable units and identify the potential for the loss of units.

**Does the availability of housing units meet the needs of the population?**

Despite a slight decline in population, rental rates and home prices have risen over the last several years. Recovering from the housing crash of 2008, Mobile has not yet returned to home values of 2008. Modest increases in rental rates and housing values do not necessarily point to supply not meeting population needs. The primary indicator of available units not meeting population needs would be the combination of cost burden identified on renter households and the large difference in unit size by tenure between owners and renters.

**Describe the need for specific types of housing:**

There is a need for more multifamily units affordable to renter households with income less than 50% AMI. More affordable housing needs to be developed that give low-income households access to economic opportunity. R/ECAPS have historically been isolated to a particular region of the city, housing options for renter households earning less than 50% need to be integrated into parts of the city that are outside of R/ECAPS. This will offer substantially better access to opportunities afforded to parts of the city that have significantly lower poverty rates.

Housing for special needs population are needed. These include housing for the elderly, people with disabilities, homeless persons and chronically homeless persons. With about 82 units available for the chronically homeless, the Continuum of Care projected another 32 units would be needed.

Comparing renters to owners in unit size by tenure, there exists a large discrepancy in shares of units by the different sizes. Just over 65% of all rental units by tenure are 2 bedrooms or less, while 85% of owner units are 3+ bedrooms. Assuming that family size does not directly correlate to housing size by tenure, it is reasonable to assume that there is a need for more affordable housing units with 2+ bedrooms that are adequate for families that rent.

**Discussion**

A wider range of housing types and affordability levels are needed to address the needs of the population. Market-rate housing is not currently providing adequately affordable housing for low-income households. Funding, incentives, and regulatory/zoning approaches need to be taken to ensure there are affordable housing opportunities in areas that are desirable for low-income households. The large gap between unit sizes by tenure when comparing owner households to renter households indicates special attention should be paid towards providing opportunities for low-income renter households that may require 2+ bedrooms.

As noted in the AFH, zoning and land use regulations may help contribute to segregation because they separate single-family dwellings from two-family and multi-family dwellings. Because single-family dwellings tend to be more expensive than other types of housing low-income households can quickly be priced out of certain neighborhoods. Further, single-family zoned neighborhoods tend to be segregated by income, meaning they may catalyze concentrations of poverty to certain parts of the City. Also as pointed out in the AFH, the household demographics in Mobile's R/ECAPS are about 91% Black.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

Mobile has seen a steady increase in both home values and rental rates in the past ten years. Although values have not returned to pre-recession levels, the consistent moderate increases over the ten-year period indicated above is indicative of a trend upwards. This is beneficial for home owners as they see their equity increase in value. However, this trend upwards is also met by a stagnation in wages meaning more households experiencing cost burden for housing.

Of the 32,674 households renting in Mobile, just over 95% pay less than \$1,000 in monthly rent.

Using HUD median income calculations, there are 39,943 affordable units available for households earning at least 80% median income. From table 10 in NA-10, there are 32,030 households in Mobile earning at least 80% median income. These numbers point to an adequate supply of affordable housing, however there is still a concern over the number of cost burdened and severely cost burdened renter households. This data would indicate the possibility that affordable housing is not necessarily available for rental households in the areas that are desirable for them. Further, as noted in the AFH, the condition of affordable housing is often in need of minor to significant repair.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2013	% Change
Median Home Value	80,400	124,300	55%
Median Contract Rent	384	576	50%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	12,650	38.7%
\$500-999	18,489	56.6%
\$1,000-1,499	1,076	3.3%
\$1,500-1,999	182	0.6%
\$2,000 or more	277	0.9%
<b>Total</b>	<b>32,674</b>	<b>100.0%</b>

Table 31 - Rent Paid

Data Source: 2009-2013 ACS

## Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,040	No Data
50% HAMFI	5,930	3,539
80% HAMFI	18,885	9,549
100% HAMFI	No Data	13,952
<b>Total</b>	<b>26,855</b>	<b>27,040</b>

**Table 32 – Housing Affordability**

Data Source: 2009-2013 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	727	732	892	1,163	1,346
High HOME Rent	640	688	827	947	1,036
Low HOME Rent	482	516	620	716	800

**Table 33 – Monthly Rent**

Data Source Comments: The above table is 2017 data taken from HUD’s website. The average rent for a one-bedroom unit in January 2017 in Mobile was \$650, and a two-bedroom unit was \$763.

## Is there sufficient housing for households at all income levels?

The raw numbers of housing units affordable to the varying income levels indicate that housing supply lines up with the number of households in each income bracket as outlined by HUD. However, looking more closely at cost burden, severe cost burden, and waitlists for public housing and vouchers indicate that the existing housing affordable is not meeting the needs of the residents. From Mobile’s AFH, the Mobile Housing Board’s Public Housing Program has a waitlist of 4,436 and an additional 959 on the waitlist for the Housing Choice Voucher Program. Data provided by HUD demonstrates that public housing in Mobile is located in neighborhoods that are segregated, have high levels of poverty, and residents lack access to opportunities to improve their financial and educational outcomes. The average household in Mobile spends 54% of their income towards transportation and housing combined. A majority (88%) of Mobile households spend more than 45% of their household income towards the combined costs of housing and transportation. When considering the development of affordable housing, proximity to affordable transit must also be considered.

A primary indicator of insufficient affordable housing for lower income rental households is the disproportionate number of cost burden households that are renters as opposed to owners. There are twice as many rental households than owner households that are cost burdened at both the 30% level



and the 50% level. This combined with a relatively large waitlist for public housing would indicate that affordable rental units for households are not readily available in areas that are desirable for them.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

Assuming the upward trend in home values and rental rates continue, affordability of housing in Mobile will face pressure. A steady moderate increase in rental rates and home values paired with stagnant wages will put households in compromising situations, forcing an increased amount of household income to be put towards housing costs.

Of all cost burdened rental households, 73%, or 10,810 households earn less than 50% AMI. Of all severely cost burdened rental households, 93%, or 8,360 households earn less than 50% AMI. Most of these households have some form of earned income, which points to a further need for incentive and investment in affordable housing. This is because the trend of wage growth does not point to a future, short-term potential for these low-earning households to suddenly afford their housing costs in the areas in which they reside.

Without significant subsidies and private incentives, the existing supply of housing cannot be expected to provide enough affordable housing options to low-income renters and owners. Also seen from that data, there are likely an insufficient number of affordable rental units for large families, as rental households are far more likely to experience over-crowding and severe-overcrowding than are owner households.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

From Table 36 above, the Fair Market Rents are markedly higher than the average rental price in Mobile. The FMR for one-bedroom units in Mobile is \$82 (13%) above the average rental price for a one-bedroom unit in Mobile. The FMR for two-bedroom units in Mobile is \$129 (17%) above the average rental price for a two-bedroom unit in Mobile. As such, the City will leverage analysis from its Housing Plan to identify areas/neighborhoods to invest in affordable housing to ensure it meets the needs of the community.

### **Discussion**

Private rental rates in Mobile are sufficiently captured by HUD's fair market rental rates, with the majority of renter households paying less than \$1,000 per month in housing costs. With only 2,040 housing units affordable for households with income at 30% HAMFI or less, it points towards the very high rates of cost burden for households in that income bracket as there are not enough affordable options for them. There is a need for housing projects that bring long-term affordability to neighborhoods given the limited options for low-income households.

## **MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)**

### **Introduction**

The condition of housing stock is a major component when assessing the overall health of the housing units available to residents in Mobile. According to the 2009-2013 CHAS data, 72% of owner-occupied housing and 68% of renter-occupied housing was built before 1980. Comprehensive data on vacant or abandoned buildings is not available.

Lead was banned from being used a construction material in 1978 due to its toxicity. Exposure to lead may cause a range of health problems, especially in young children. Lead from paint can seep into things both inside and outside of the home, leaving potential for lead mixed materials to be tracked around a home.

### **Definitions**

Substandard Condition: no major structural defects, adequate plumbing facilities and an appearance which does not create a blighting influence.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition is both financially and structurally feasible for rehabilitation.

The definition of substandard condition but suitable for rehabilitation may also include a quantifiable standard such as a dwelling in which the deficiencies are limited in number and magnitude such that the cost of rehabilitation would not exceed 50% of the replacement cost of the dwelling. Examples of minor repairs may include disability access, lead-based paint remediation, foundation repair, wall repair, window/ door replacements, electrical repair, and/ or roof repair.

A property may be considered in “substandard condition but suitable for rehabilitation” if it is dilapidated or deteriorated beyond feasible economic repair, or rehabilitation will exceed 50% of the replacement cost of the dwelling.

Most owner-occupied units have no selected conditions, while 26% have one condition. The majority of renter-occupied units have one or more selected conditions.

Mobile’s housing stock was mostly built before 1980. Of all 76,321 housing units in Mobile, 53,998 or 71% were built before 1980.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	11,288	26%	16,410	50%
With two selected Conditions	207	0%	848	3%
With three selected Conditions	37	0%	70	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	32,115	74%	15,346	47%
<b>Total</b>	<b>43,647</b>	<b>100%</b>	<b>32,674</b>	<b>100%</b>

**Table 34 - Condition of Units**

Data Source: 2009-2013 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,980	7%	2,470	8%
1980-1999	9,151	21%	7,722	24%
1950-1979	24,357	56%	17,804	54%
Before 1950	7,159	16%	4,678	14%
<b>Total</b>	<b>43,647</b>	<b>100%</b>	<b>32,674</b>	<b>100%</b>

**Table 35 – Year Unit Built**

Data Source: 2009-2013 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	31,516	72%	22,482	69%
Housing Units build before 1980 with children present	3,574	8%	1,479	5%

**Table 36 – Risk of Lead-Based Paint**

Data Source: 2009-2013 ACS (Total Units) 2009-2013 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 37 - Vacant Units**

Data Source: 2005-2009 CHAS

## **Need for Owner and Rental Rehabilitation**

With a large percentage of the housing stock being built before 1980, there is a need for owner and rental rehabilitation with lead mitigation as the focus. It is also important to note that the 2016 poverty rate in Mobile was 23.1%, meaning that many households will not have the resources needed to take care of needed hazard mitigation on their own.

## **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

There is no readily available source of data that would allow for an estimate that precisely gets to this question. See response in MA-20 Tables 38 and 39 for housing stock that is at risk of lead paint.

A combination of Table 39 from MA-20 and Table 6 from NA-10 could lead to a reasonable estimate for low- or moderate-income families with LBP hazards. Of the 76,315 household in Mobiles, 32,030 households earn 80% HAMFI or below. That is 41.9% of all households in Mobile living at 80% HAMFI or below. Assuming an equal portion of all income brackets are living in homes built before 1980 we could estimate that of the 53,998 housing units built before 1980, 22,625 of those are occupied by households that earn less than 80% HAMFI.

## **Discussion**

The City of Mobile incorporates lead abatement and remediation into activities as risk of lead is identified on the property.

The City of Mobile is a coastal city, making it vulnerable to sea level rise and susceptible to extreme weather events, including hurricanes. The U.S. Global Change Research Program has established possible future flood depths in Mobile, AL with rising sea level. The areas that are most likely to be impacted by rising sea levels include several the most economically vulnerable neighborhoods in Mobile. As discussed in the Assessment of Fair Housing, the majority of low-and moderate-income neighborhoods are near Mobile Bay and a network of waterways that feed into the bay.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Mobile Housing Board, the housing authority of the City of Mobile, currently operates 12 public housing developments with a total of 2,665 units and oversees the Housing Choice Voucher program that has access to 4,306 vouchers. Efforts to address the poor quality of units and corresponding vacancy rates are underway as the MHB moves forward with the demolition of the Roger Williams Homes, as part of a larger redevelopment effort informed by the Choice Neighborhood Plan for the area. Additionally, MHB is seeking other sources of funding to create new units, including Low Income Housing Tax Credits.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			3,405	4,166			31	312	984
# of accessible units									

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Mobile Housing Board (MHB), the housing authority for the City of Mobile, serves 3,636 residents in 1,806 public housing units located in 12 developments and 3,989 households through the Housing Choice Voucher program. There are 4 public housing developments that serve seniors throughout MHB's portfolio. The waiting list for public housing units is 2,370 households and 976 for Housing Choice Vouchers (HCV).

## Public Housing Condition

Public Housing Development	Average Inspection Score
Portfolio Wide	61

Table 39 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Mobile's public housing stock is some of the oldest in the country and many units are in need of major repair or replacement. The Mobile Housing Board is moving forward with plans to redevelop and modernize units through a Rental Assistance Demonstration award and exploring other funding opportunities.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Mobile Housing Board is moving forward to implement aspects of the Choice Neighborhood plans. Roger Williams Homes, a 452-unit development, is currently being demolished through a combination of RAD funds and HUD's traditional Section 18 Demolition and Disposition program. This demolition is scheduled to be completed in May 2018. This same site was the subject of a Choice Neighborhoods Planning grant. Through the planning and interaction completed under the CNI planning grant, a number of units were identified to replace the public housing units that are being demolished on site.

Currently, the Mobile Housing Board is working with a developer to submit a tax credit application (February 2018) for a 64-unit senior complex which, if approved, will be the first units to return to the site. The units will be a mix of approximately 42 RAD units and 22 Project Based Voucher (PBV) units.

### Discussion:

With the support of the City of Mobile, the Mobile Housing Board is moving forward with plans to make capital improvements to create high-quality affordable housing and engage in holistic neighborhood revitalization efforts to improve access to opportunity and overall living conditions of residents.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

The City of Mobile provides funding through ESG to organizations that assist homeless persons.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	118	43	62	306	0
Households with Only Adults	236	0	60	198	0
Chronically Homeless Households	0	0	0	30	0
Veterans	0	0	0	56	0
Unaccompanied Youth	0	0	0	11	0

**Table 40 - Facilities and Housing Targeted to Homeless Households**

**Data Source Comments:** Data Source: 1. 2016 HIC Counts by COC, COC AL-501 – Number given does not include Rapid Re-Housing Beds. 2. 2016 PIT Counts by COC, COC AL-501 – Number given is number of Sheltered, Number of Beds not available.



**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

The mainstream services such as health care are provided by the Infirmary Hospital, University of South Alabama Women and Children's Hospital, and USA Medical, Springhill Hospital, Providence Hospital. Franklin Health Center provides health care services to the low income and homeless population. AltaPoint Mental Health Systems provides mental health services and permanent housing for the chronic homeless. Employment services, workforce development is provided by Mobile Works, and GED training and assistance is provided by Bishop State College. Salvation Army provides employment services. These services are available to the homeless population and the service providers coordinate the referrals with the applicable institutions.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

**The AltaPoint Health Systems** - Provides mental health services and permanent housing for the chronic and disabled homeless, including Shelter Plus care.

**Catholic Social Services** - Provides permanent housing for the disabled homeless, rapid-re-housing and homeless prevention.

**Dumas Wesley/Sybil Smith family Village** - Transitional housing for women with children and support services.

**Family Promise of Coastal Alabama** - Temporary shelter and supportive services to intact homeless families with children and coordinates the Interfaith Hospitality Network Shelter Program.

**Housing First, Inc.** - Community Housing Program, Homeless prevention and Rapid Re-housing (HRRP), permanent housing for the disabled homeless, scattered transitional housing for families, operation of Homeless Management Information System and planning.

**Inner-city Mission/McKemie Place** - Emergency overnight shelter for homeless single women.

**Mobile Housing Board** - HUD-VASH, housing for the disabled and frail elderly, families with children.

**Penelope Housing** - Housing for victims of domestic violence, transitional housing, counseling services.

**Salvation Army** - Center for women and children, project able, transient lodge for men, jobs program.

**St. Mary's Home** - Opportunities for Independent Living.

**Waterfront Rescue Mission** - Transient Lodge for Men.

**Ozanam Charity Pharmacy** - Free prescription medication assistance.

**WAVE Transit** - Affordable public transportation.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Mobile residents with special needs have access to services and support throughout the region. However, the demand for accessible affordable housing, affordable healthcare, and other services outweighs the supply.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Throughout the City, there is a network of service providers that assist individuals with special needs. Organizations such as the Independent Living Center, Mobile ARC, and Goodwill Easterseals Gulf Coast provide services such as healthcare, housing, transportation, and job and skills training for persons with disabilities and the elderly.

In addition to public housing developments and vouchers, which provide housing for 1,181 elderly people and 1,521 disabled families, there are 423 units in publicly funded multi-family units that serve low income households. Many of these units are designated for seniors or persons with disabilities.

In addition to testing and other healthcare and counseling services, AIDS Alabama provides housing assistance and housing for people with HIV/AIDS.

The network of service providers that serve homeless persons or those at risk of becoming homeless provide services that seek to meet the diverse needs of this population.

**The AltaPoint Health Systems** - Provides mental health services and permanent housing for the chronic and disabled homeless, including Shelter Plus care.

**Catholic Social Services** - Provides permanent housing for the disabled homeless, rapid-re-housing and homeless prevention.

**Dumas Wesley/Sybil Smith family Village** - Transitional housing for women with children and support services.

**Family Promise of Coastal Alabama** - Temporary shelter and supportive services to intact homeless families with children and coordinates the Interfaith Hospitality Network Shelter Program.

**Housing First, Inc.** - Community Housing Program, Homeless prevention and Rapid Re-housing (HPRP), permanent housing for the disabled homeless, scattered transitional housing for families, operation of Homeless Management Information System and planning.

**Inner-city Mission/McKemie Place** - Emergency overnight shelter for homeless single women.

**Mobile Housing Board** - HUD-VASH, housing for the disabled and frail elderly, families with children.

**Penelope Housing** - Housing for victims of domestic violence, transitional housing, counseling services.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The City of Mobile adopted the following Discharge Policy Statement for Homeless Citizens in March 2007:

“It is the policy of the City to prevent homelessness by encouraging local and publicly funded institutions or systems of care to contact with Housing First, Inc., the Homeless Coalition for discharge planning consultation and assistance regarding citizens known to be homeless or who could become homeless at the time of discharge.”

Housing First, Inc., as the lead organization for the CoC that serves The City of Mobile, provides discharge planning consultation to publicly funded institutions and system of care regarding citizens known to be homeless or at risk of becoming homeless at the time of discharge, and to provide assistance for facilitating access to services and housing that could end or prevent homelessness for these citizens.”

Protocols for discharging homeless persons from institutions and facilities are in effect for the following: Foster care, health care facilities, mental health system, AltaPoint Health Systems and Corrections facilities. The State of Alabama Department of Corrections has a basic policy for requiring an address for prisoners who will be released on probation. Therefore, such individuals are not considered homeless at the time of release.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City of Mobile will provide \$273,500 to organizations providing services to seniors, persons with disabilities, and youth. These services include transitional work training programs, access to affordable prescription medication, community outreach and engagement geared at seniors, and programs to provide youth with enrichment opportunities.

The City has also committed to support the Mobile Housing Board’s 2018 LIHTC application. These units will serve 64 low-moderate income households.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

The City of Mobile will provide \$273,500 to organizations providing services to seniors, persons with disabilities, and youth. These services include transitional work training programs, access to affordable prescription medication, community outreach and engagement geared at seniors, and programs to provide youth with enrichment opportunities. These programs will serve an estimated 2,500 individuals.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Barriers to affordable housing were identified throughout the Assessment of Fair Housing and Consolidated Plan Process.

**Local Government Funding:** While the City of Mobile has provided general funds to support infrastructure development, State law prevents the City from making general funds available for housing grants and loans.

**Tax Delinquent property:** The process for obtaining clear and marketable titles to tax delinquent properties has improved as the City and State have moved forward with policy reforms. However, the prevalence of heir properties and resources needed to clear these titles limits the City's ability to move these properties through the process quickly and efficiently. As a result, too many tax delinquent properties that could be redeveloped for affordable housing sit vacant and serve as blight on the neighborhoods.

**Zoning and Land Use:** Current zoning strongly favors single family housing development, coupled with community opposition to multifamily development, this poses challenges for building multi-family developments across the city, but especially in neighborhoods of opportunity. Zoning regulations too often impose standards for site development that increase the cost of housing. This is particularly true, and unnecessary, in older inner-city neighborhoods where lots have been historically smaller and housing patterns more dense. The connotation that smaller lots and more densely populated neighborhoods is bad, along with certain zoning regulations, has hampered revitalization in some neighborhoods.

**Lack of Public Investments:** The City is currently working to address infrastructure needs across the city, however, the need exceeds the amount of resources available. Areas around public housing developments need additional access to resources and funding for revitalization, the housing stock is out of date and in need of capital improvements.

**Lack of Regional Cooperation:** Stakeholders identified the need for additional coordination between local and regional government service providers to efficiently use limited resources.

**Limited Access to Opportunity:** Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, fostering disparities in access to jobs, affordable transportation and educational opportunities.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

Combining to employ 31,233 residents, making up 53% of all employed workers in Mobile, the top three employment sectors by the number of workers employed are:

1. Education and health care services
2. Retail trade
3. Arts, entertainment, accommodations

As of 2013, there were 91,972 individuals in the civilian labor force, 47% of Mobile’s overall population, with an unemployment rate in 2013 of 13.3%. According to 2013 American Community Survey data, the median income for households was \$38,644. Notably, married-couple family households had a median income of \$70,012 while nonfamily households had a median income of \$27,119. Nonfamily households consist of single person households as well as households with unrelated individuals living together. The median household income for Mobile City households is approximately 10 percentage points less when compared to Mobile County as a whole.

Household earnings in Mobile are reflective of educational attainment. Median earnings for those with a bachelor’s degree is 75% higher than those with a high school diploma (or equivalent) only. Of those Mobile residents 25 years of age or older, 42% have a high school diploma (GED or equivalent alternative) or less and 26% have a bachelor’s degree or more.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	500	153	1	0	-1
Arts, Entertainment, Accommodations	9,072	13,276	15	13	-2
Construction	3,200	4,946	5	5	0
Education and Health Care Services	11,745	20,371	20	21	1

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Finance, Insurance, and Real Estate	3,744	6,864	6	7	1
Information	872	1,761	1	2	1
Manufacturing	5,838	9,694	10	10	0
Other Services	2,404	3,938	4	4	0
Professional, Scientific, Management Services	4,454	9,397	8	10	2
Public Administration	0	0	0	0	0
Retail Trade	10,416	16,567	18	17	-1
Transportation and Warehousing	3,273	5,422	6	6	0
Wholesale Trade	3,151	6,175	5	6	1
Total	58,669	98,564	--	--	--

**Table 41 - Business Activity**

Data Source: 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)



## Labor Force

Total Population in the Civilian Labor Force	91,792
Civilian Employed Population 16 years and over	79,563
Unemployment Rate	13.32
Unemployment Rate for Ages 16-24	29.28
Unemployment Rate for Ages 25-65	8.74

**Table 42 - Labor Force**

Data Source: 2009-2013 ACS

Occupations by Sector	Number of People
Management, business and financial	16,453
Farming, fisheries and forestry occupations	2,698
Service	9,638
Sales and office	21,400
Construction, extraction, maintenance and repair	5,445
Production, transportation and material moving	3,786

**Table 43 – Occupations by Sector**

Data Source: 2009-2013 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	58,629	77%
30-59 Minutes	14,706	19%
60 or More Minutes	2,517	3%
<b>Total</b>	<b>75,852</b>	<b>100%</b>

**Table 44 - Travel Time**

Data Source: 2009-2013 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,718	1,887	5,938
High school graduate (includes equivalency)	15,669	2,712	8,744
Some college or Associate's degree	22,593	2,973	7,630

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	21,814	1,062	3,936

**Table 45 - Educational Attainment by Employment Status**

Data Source: 2009-2013 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	352	538	486	1,499	2,147
9th to 12th grade, no diploma	4,257	3,123	1,871	4,026	3,335
High school graduate, GED, or alternative	6,425	6,657	5,934	14,576	9,301
Some college, no degree	8,497	7,538	5,589	11,468	5,132
Associate's degree	644	2,060	2,452	4,164	1,289
Bachelor's degree	1,946	5,718	3,816	8,565	3,411
Graduate or professional degree	166	1,717	2,269	4,768	2,795

**Table 46 - Educational Attainment by Age**

Data Source: 2009-2013 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	15,741
High school graduate (includes equivalency)	23,586
Some college or Associate's degree	27,080
Bachelor's degree	41,326
Graduate or professional degree	55,422

**Table 47 – Median Earnings in the Past 12 Months**

Data Source: 2009-2013 ACS

### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Just over half of all workers are employed in one of three sectors: Education and Health Care Services, Retail Trade, or Arts, Entertainment, Accommodations. These three sectors make up 53% of the workers in Mobile. The largest shift in worker employment from 2009 has been in the Education and Health Care Services sector. The number of workers in this sector is down 8% from 2009; while in 2013 there were 20,371 jobs there were only 11,745 workers. While this sector faced the largest downturn, nearly all sectors have experienced a similar situation. This data indicates that increased job training and

education will be needed to ensure that jobs that have potential for moderate earnings go to Mobile residents.

The top three manufacturing employers in the Mobile area, employing 6,840 people, are Austal USA, AM/NS Calvert, and ST Aerospace Mobile. The three largest non-manufacturing employers in the Mobile area, employing 17,548 people, are Mobile County Public School System, the University of Alabama and USA Medical Facilities, and Infirmiry Health Systems.

**Describe the workforce and infrastructure needs of the business community:**

The Mobile labor force is made up of 91,792 residents, of these, 79,563 are employed. The unemployment rate of 13.32% is up from 8.5% in 2012. The unemployment rate for 16-24 year old persons is 29.28% while for people 25-65 years old it is 8.74%.

The City has good institutional infrastructure to support its economic development initiatives and business community; however, there is a need to improve the quality of the workforce so they can take advantage of the available jobs and new jobs to be created. Most of the new jobs require simple mathematics background and those graduating from high school simply are ill-equipped to handle the new jobs and most of the jobs currently available. In addition to basic skills, there is a need for more workers with a more advanced skills. According to AIDT, Alabama's workforce development agency, 62% of Alabama's workforce will need a college degree, apprenticeship or certification that meets the educational needs of employers to meet demand, a 25 point increase from today's figures.[1] . The small and minority-owned businesses and entrepreneur needs technical assistance, business education and management and capital to start or expand existing business.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

There are multiple new large investments on the horizon for the Mobile region. Walmart is set to open a distribution center in Spring 2018. The facility is projected to bring up to 550 full-time jobs with an average annual wage of \$35,000 plus benefits. There is an agreement in place between Mobile and Walmart requiring local residents to be given preferential treatment in the hiring process.

The newly constructed Amazon sortation center located west of Mobile employs 200-500 people, a mix between full and part-time; adding up to 1,000 more temporary part-time positions during the holiday season each year.

The Airbus facility that opened in 2015 is also planning to invest in a new assembly line in Mobile which will assemble Bombardier CSeries planes in addition to the Airbus A320-family jets currently in production. The investment is part of the growing aerospace industry in the region.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

The highest unemployment rates are among those persons without a bachelor’s degree. More specifically, those without a high school diploma face unemployment at a rate of 34%, those with a high school diploma only are unemployed at a rate of 15%, and finally those individuals with some college or an associate’s degree are at 12% unemployment. Those with a bachelor’s degree or higher are unemployed at 5%. This data suggests what is seen throughout the country that higher education is a protective factor for unemployment.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

AIDT is an independent agency that provides workforce development services in Mobile, and throughout Alabama. In response to increased employment opportunities in the maritime industry, the Maritime Training Center was opened in 2010. Operated by AIDT, the center trains individuals in a variety of technical skills as well as office management and leadership skills. The training center also provides specialized trainings to companies at-large as well working in direct partnership with local high schools.

Alongside growth in the maritime industry, employment opportunities have come in the aviation industry as well. The Alabama Aviation Training Center provides workforce training for the aviation industry and will eventually serve as the official Airbus training facility. The \$6.5 million center will be funded by the Alabama Governor’s office and Airbus through reimbursements from AIDT.

Through the Mayor’s program, Youth Empowered Success (YES), the Mobile Housing Board, Bishop State Business and Technology Center, and the University of South Alabama Hospitality and Workforce Alliance are working with 250 individuals between ages 14-29 to provide training and paid summer internships.

The City of Mobile provides training and on-demand assistance to local Disadvantaged Business Enterprises (DBEs) through the Office of Supplier Diversity Manager. By offering assistance on a variety of issues, from obtaining a business license from the City of Mobile to working with the City to provide training on responding to requests for services, the goal of this City office is to assist DBEs in the opportunity to provide goods and services to the City of Mobile.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The City of Mobile continues to support economic development by investing infrastructure through the Capital Improvement Plan, building capacity of local businesses through the Office of Supplier Diversity, and engaging in major planning efforts, including Map for Mobile and an overhaul of local zoning codes. The City also supports efforts of local and regional partners economic development partners such as the Mobile Area Chamber of Commerce, Alabama Department of Economic and Community Affairs, Economic Development Partnership of Alabama, Port of Mobile, Mobile Aeroplex at Brookley, Alabama Power Company, MobileGas, and the University of South Alabama.

## **Discussion**

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

Mobile has 26 racially/ethnically-concentrated areas of poverty (R/ECAP) as identified by HUD, most of which are located east of Highway 65. R/ECAPs are areas with a non-white population of 50 percent and more than 40 percent of individuals living at or below the poverty level. Overall, these neighborhoods are also the neighborhoods that have the highest rates of blight and other housing problems. The following table provides a summary of the neighborhoods within R/ECAPs from 1990 to 2010.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

As noted above, Mobile has 26 racially/ethnically-concentrated areas of poverty (R/ECAP) as identified by HUD, most of which are located east of Highway 65.

### **What are the characteristics of the market in these areas/neighborhoods?**

In comparison to the City as a whole or more affluent neighborhoods, housing values are drastically lower in many of the neighborhoods identified. For example, the median listing price per square foot across the city was \$80 in 2017, in comparison to \$20 to \$30 per square foot on Oakleigh.[1]

As noted in the description of the CDBG Target Area, in which a number of R/ECAPs are located, these areas have higher percentages of blighted structures and other vacant property than the City as a whole. In comparison, 10% of units in the CDBG Target Area are vacant in comparison to 6% throughout Mobile.[2] Blight data collected by the City's Innovation Team identified 851 blighted structures in the CDBG Area, which accounts for 65% of the structures identified as blighted by the Innovation Team.

### **Are there any community assets in these areas/neighborhoods?**

These neighborhoods are located in the older parts of the city and in proximity to a number of the City's institutions. Neighborhoods are located near downtown, universities, hospitals, and local government buildings. While public transportation is very limited in Mobile, the neighborhoods east of Highway 65 are better served than many neighborhoods throughout the city.

### **Are there other strategic opportunities in any of these areas?**

There are a number of strategic opportunities that the City of Mobile can leverage to increase the impact of community development projects. The City of Mobile is working diligently to carry out its Capital Improvement Plan, which will address infrastructure improvements throughout the city. Additionally, Mobile recently received TIGER grant funds to improve the quality and connectivity of

Broad Street, Dr. Martin Luther King Jr. Avenue, and Beauregard Street. The \$14.5 million grant will fund projects to increase mobility by investing in new streets, bicycle lanes, sidewalks, drainage, and landscaping, connecting neighborhoods and increasing recreation opportunities. The improvements will take place in four phases over seven years and expected to begin in 2018. Construction has also started on projects to improve Three Mile Creek and create a greenway that will run across the city. The first phase will begin near Tricentennial Park and will include a path for bicyclists, joggers, and walkers as well as benches, solar-powered lights, and a kayak launch. The success of the Airbus facility located at the Mobile Aeroplex at Brookley, near some of the low-income neighborhoods struggling with blight, has spurred investment in job training facilities and expanded operations.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan is a five-year plan that is rooted in data and assesses local market conditions, access to affordable housing, blight, and community development needs. Combined with the Needs Assessment, Market Assessment, and Action Plan, the Strategic Plan guides the outcomes of the Consolidated Plan. The Strategic Plan is informed by local needs and priorities identified by the City of Mobile, Mobile Housing Board, and other stakeholders and provides allocations for CDBG, HOME, and ESG funding.



## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 48 - Geographic Priority Areas

<b>1</b>	<b>Area Name:</b>	Neighborhood Revitalization Strategy Target Area
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Housing
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The neighborhood boundaries for Neighborhood Revitalization Strategy Target Area include parts of the 2010 Census Tracts 2.00, 4.01, 4.02 and 5.00. Specifically Block Groups 2.001, 4.011, 4.012, 4.013, 4.014, 4.021, 4.022, 5.001, 5.002 and 5.003. The boundaries are Conception Street Rd to the North and East, Three Mile Creek to the West, St Stephens Rd and St Louis Street to the South. The proposed NRS Area is bounded by Conception Street Road on the north, St. Louis-St. Stephens Road on the south, Three Mile Creek on the west, and N. Conception Street on the east. The area includes the MLK Heritage Redevelopment Area and the entire area lies within the CDBG-Eligible Area.
	<b>Include specific housing and commercial characteristics of this target area.</b>	<b>Population:</b> Based on the 2010 Census, the area has a total population of 3,574; of these, 3,302 or 92.4% are African-Americans, 211 (5.9%) are whites, and 61 (1.7%) represents other race. Approximately 51% of the total population are female and 49% are male. In terms of age distribution, 16% are 65 years or older compared to 12.8 citywide, 65% are between the age of 18 and 65, and 19% are under the age of 18 years. The area’s population is aging faster than the city as a whole.

<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>This NRSA was identified and approved by the City Council as part of the 2013 Consolidated Plan. It was proposed to be continued as a NRSA during the 2018 Consolidated Plan with no objections.</p> <p>The NRS was developed in consultation with the 2013-2017 Consolidated Housing and Community Development Plan Citizens Advisory Committee, discussion with the Mayor and the City Council Entitlement Committee. This area is a priority for the City in terms of neighborhood and commercial corridor revitalization initiatives. Details of the strategy area were published as part of the 2013 - 2017 Consolidated Housing and Community Development Plan Public Review process on Sunday, January 20, 2013, in the Mobile Press-Register, for discussion on the Consolidated Plan public hearing on February 20, 2013. There were no comments received throughout the thirty-day public notice period.</p>
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**Identify the needs in this target area.**

**Household Income and Poverty:** The median household income is \$17,931 compared to \$36,168 for the City; this represents 49.6% of the city median household income. The percentage of people below the poverty level in the area is 63% compared to 21.8% for the City of Mobile. The area has a high concentration of poverty. There are four census tracts that make up this area (2.00, 4.01, 4.02 and 5.00). The average unemployment rate is 27% compared to 8.5% citywide, more than three times the city rate.

**Housing:** The Area has 2,188 housing units; of these, 1,455 or 67% are occupied and 733 (33%) are vacant compared to 14% citywide; 752 (52%) are renter occupied compared to 41.6% in the city and 703 or (48%) are owner occupied compared to 58.4% citywide. More than 25% of the units in the area are in substandard conditions. The area is also beset with massive vacant lots that are unmaintained, contributing to the deterioration of the neighborhoods.

**Performance Measurements**

The City proposes the following performance measures for the Neighborhood Revitalization Strategy Area, selected from the Consolidated Plan objectives. The projected date for accomplishment is 2017.

Economic Development

- Facilitate the creation and/or expansion of at least 5 small businesses specifically targeting jobs to low and moderate income individuals.
- Facilitate the creation of at least 20 jobs targeted to low-moderate income residents.
- Enhance the vitality of least 2 commercial corridors.

Infrastructure Improvement

- Fund infrastructure improvement projects.
- Support implementation of New Mobile Plan.
- Ensure that the tree density of the urban forest remains stable or increases; minimize the occurrence of tree failures through identification

<p><b>What are the opportunities for improvement in this target area?</b></p>	<p><b>ASSETS AND POTENTIAL REDEVELOPMENT OPPORTUNITIES</b></p> <p>The area has several assets and redevelopment potential. These include: the presence of Bishop State Community College, access to the Interstates 10 and 65, proximity to the downtown area, the closed Hickory Landfill that can be adaptively reused as a recreational park, Three Mile Creek that presents linear park development potential, commercial corridors (MLK Avenue, St. Stephens Road and Broad Street) that could spur business development and job creation opportunity, presence of MLK Redevelopment Corporation and Mobile Housing Board redevelopment projects, availability of vacant lots and dilapidated structures suitable for infill residential development and above all, a renewed interest in the future of the area.</p> <p><b>Redevelopment Collaboration</b></p> <p>The City has partnership relations with the MLK Redevelopment Corporation, a Community Housing Development Organization (CHDO), the Bishop State College and the Mobile Housing Board (MHB) and will work together to revitalize the area.</p> <p><b>Commercial Corridors Revitalization</b></p> <p>Corridor revitalization initiatives will be undertaken for Broad Street, MLK, Jr. Avenue, and St. Stephens Road. This strategy is designed to spur investments, commercial corridor revitalization and job creation.</p> <p><b>Creation of Community-Based Development Organization (CBDO)</b></p> <p>This proposed initiative is designed to increase the commitments of residents and neighborhood organizations within the Neighborhood Revitalization Strategy Area in project conception, planning, broad-based participation and implementation. This program will also strengthen the neighborhood organizations' capacity to act as active partners in the redevelopment efforts.</p>
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	<b>Are there barriers to improvement in this target area?</b>	Barriers to this area are similar, yet compounded, when compared to other CDBG eligible census tracts. Due to the concentration of poverty and blight, there is a natural deterrent for developers to enter the market. In most cases, this will cause a need for subsidized investment to reduce developer and investor risk.
2	<b>Area Name:</b>	City-wide
	<b>Area Type:</b>	Jurisdiction Corporate City Limits
	<b>Other Target Area Description:</b>	Jurisdiction Corporate City Limits
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	This area is included as a reference. This area is the corporate City limits of the City of Mobile, Alabama
	<b>Include specific housing and commercial characteristics of this target area.</b>	Specifics of this area are described in detail throughout the plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	This area is the designated jurisdiction by HUD.
	<b>Identify the needs in this target area.</b>	The needs in this area are those describes throughout the plan.
	<b>What are the opportunities for improvement in this target area?</b>	The opportunities in this area are those described throughout the plan.
<b>Are there barriers to improvement in this target area?</b>	The barriers in this area are those described throughout the plan.	

### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Allocation priorities are focused on making strategic investments throughout Mobile. As noted in the AFH, the City of Mobile will target developments throughout the City with a focus, though not a sole focus, on investing in high opportunity areas. The City will naturally



**NRSA Map**

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 49 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	AFH: Lack of public investments in specific areas
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Increase Coordination AFH: Access to high opportunity areas AFH: Access to opportunities
	<b>Description</b>	The term “public investment” refers here to the money government spends on housing and community development, including public facilities, infrastructure, services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

	<b>Basis for Relative Priority</b>	<p>The City of Mobile is currently trying to address a backlog of infrastructure needs and is investing in infrastructure throughout the city. However, the resources available do not meet the needs of the community.</p> <p>There is also a need for major investment in the communities surrounding public housing units and the units themselves. Mobile’s public housing stock is out of date and in some instances requiring capital improvements.</p> <p>Stakeholders identified the need for expanded transit services to increase the frequency and hours of service.</p> <p>The Mobile County School District has closed and restructured schools located in low income communities, limiting access to neighborhood schools.</p>
<b>2</b>	<b>Priority Need Name</b>	AFH: Lack of private investments in neighborhoods
<b>Priority Level</b>	High	
<b>Population</b>	Extremely Low Low Moderate Middle	
<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits	
<b>Associated Goals</b>	AFH: Access to opportunities	
<b>Description</b>	<p>The term “private investment” refers here to investment by non-governmental entities, such as corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While “private investment” may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.</p>	



	<b>Basis for Relative Priority</b>	<p>The most segregated areas of the city continue to be underserved by services and businesses. In addition to a lack of services such as grocery stores and banks, many non-profits are located in areas with less needs.</p> <p>These areas have also fallen into disrepair, increasing the required amount of investment for renovation and revitalization activities.</p>
3	<b>Priority Need Name</b>	AFH: Lack of community revitalization strategies
	<b>Priority Level</b>	Low
	<b>Population</b>	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Public Housing Residents</p> <p>Non-housing Community Development</p>
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	<p>The term “community revitalization strategies” refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.</p>
	<b>Basis for Relative Priority</b>	<p>Community revitalization strategies and activities are underway throughout Mobile. However, the need for revitalization activities is greater than the existing strategies and activities. Community development organizations are facing a lack of resources and would benefit from increased cooperation throughout the community.</p>

4	<b>Priority Need Name</b>	AFH: Location and type of affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Access to opportunities
	<b>Description</b>	Affordable housing includes, but is not limited to publicly supported housing; however each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.
	<b>Basis for Relative Priority</b>	Affordable housing units are primarily available in R/ECAP and segregated areas of the city with less access to opportunities. Existing public housing units, which are primarily located in these areas are in need of major renovations and improvements.
5	<b>Priority Need Name</b>	AFH: Lending discrimination
	<b>Priority Level</b>	Low
	<b>Population</b>	Moderate Middle

	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Protected Classes
	<b>Description</b>	<p>The term “lending discrimination” refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These Appendices Page 215   AFFH Rule Guidebook services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.</p>
	<b>Basis for Relative Priority</b>	<p>HMDA data suggests that white, non-Hispanic individuals in Mobile are more likely to be approved for financing.</p> <p>Black, non-Hispanic applicants were nearly twice as likely to be denied for a loan than white, non-Hispanic applicants in 2015</p> <p>At every income level, white, non-Hispanic buyers made up a significantly larger percentage of loan originations in 2015.</p>
6	<b>Priority Need Name</b>	AFH: Land use and zoning laws
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Middle Elderly Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
<b>Associated Goals</b>	AFH: Zoning Code Recommendations
<b>Description</b>	<p>The term “land use and zoning laws” generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing. Examples of such laws and policies include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.</li> <li>• Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.</li> <li>• Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).</li> <li>• Inclusionary zoning practices that mandate or incentivize the creation of affordable units.</li> <li>• Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.</li> <li>• Growth management ordinances.</li> </ul>

	<b>Basis for Relative Priority</b>	<p>Current land use and zoning laws reflect a strong preference for single family housing development in Mobile, limiting affordable options for developers. Additionally, there is a lack of community support for multi-family developments, specifically in historic areas of the city.</p> <p>Multi-family unit development is limited by minimum lot sizes and lack of multi-family zoning.</p> <p>The City does not currently have mechanisms to require fair housing development such as inclusionary zoning.</p> <p>There are limitations on supportive housing units and homeless and emergency shelters are only allowed with the Planning Board’s approval.</p>
<b>7</b>	<b>Priority Need Name</b>	AFH: Occupancy codes and restrictions
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Zoning Code Recommendations

	<b>Description</b>	<p>The term “occupancy codes and restrictions” refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons. Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Occupancy codes with “persons per square foot” standards.</li> <li>• Occupancy codes with “bedrooms per persons” standards. • Restrictions on number of unrelated individuals in a definition of “family.”</li> <li>• Restrictions on occupancy to one family in single family housing along with a restricted definition of “family.” Appendices Page 217   AFFH Rule Guidebook</li> <li>• Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.</li> <li>• Restrictions on where voucher holders can live.</li> <li>• Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.</li> <li>• Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.</li> <li>• Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).</li> <li>• Inclusionary zoning practices that mandate or incentivize the creation of affordable units.</li> <li>• Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.</li> <li>• Growth management ordinances.</li> </ul>
	<b>Basis for Relative Priority</b>	A large percentage of Mobile is zoned for single family housing. The definition of “family” reads as follows: One (1) or more persons living together as a single housekeeping unit, which may include not more than four (4) lodgers or boarders.
<b>8</b>	<b>Priority Need Name</b>	AFH: Private discrimination
	<b>Priority Level</b>	Low

<b>Population</b>	<p>Large Families  Families with Children  Elderly  Elderly  Frail Elderly  Persons with Mental Disabilities  Persons with Physical Disabilities  Persons with Developmental Disabilities  Persons with Alcohol or Other Addictions  Persons with HIV/AIDS and their Families  Victims of Domestic Violence</p>
<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
<b>Associated Goals</b>	AFH: Access to opportunities
<b>Description</b>	<p>The term “private discrimination” refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners’ associations, and condominium boards. Some examples of private discrimination include:</p> <ul style="list-style-type: none"> <li>• Refusal of housing providers to rent to individuals because of a protected characteristic.</li> <li>• The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.</li> <li>• Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.</li> <li>• Failure to grant a reasonable accommodation or modification to persons with disabilities.</li> <li>• Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling.</li> </ul> <p>Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.</p>
<b>Basis for Relative Priority</b>	The most frequent fair housing complaints in Mobile at HUD are for disability and race. Race made up 27% of the complaints between May 2012 and January of 2017.

<b>9</b>	<b>Priority Need Name</b>	AFH: Community opposition
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes



	<b>Description</b>	The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as “Not in my Backyard,” or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.
	<b>Basis for Relative Priority</b>	Stakeholder interviews indicated that there was community opposition to affordable housing development across the city, especially for housing for special needs populations.
<b>10</b>	<b>Priority Need Name</b>	AFH: Lack of local or regional cooperation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Increase Coordination AFH: Regional Coordination
	<b>Description</b>	The term “regional cooperation” refers here to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.

	<b>Basis for Relative Priority</b>	Stakeholders felt that collaboration between local government and local services providers needs to improve and requires leadership support from the City. Many identified the need for organizations providing similar services to collaborate to efficiently use limited resources.
<b>11</b>	<b>Priority Need Name</b>	AFH: Deteriorated and abandoned properties
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas
	<b>Description</b>	The term “deteriorated and abandoned properties” refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community’s distress and disinvestment and are often associated with crime, increased risk to health and welfare, decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.
	<b>Basis for Relative Priority</b>	The identified R/ECAPs in Mobile are areas in which there is a high rate of blight and abandonment.  Public housing developments are located within many of the R/ECAPs and need redevelopment or significant repairs.
<b>12</b>	<b>Priority Need Name</b>	AFH: Displacement due to economic pressure
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Public Housing Residents
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas
	<b>Description</b>	The term “displacement” refers here to a resident’s undesired departure from a place where an individual has been living. “Economic pressures” may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.
	<b>Basis for Relative Priority</b>	Mobile has seen an increase in demand for housing in some downtown neighborhoods, this is pushing low- and moderate-income people into more affordable units in nearby R/ECAPs.  The supply of public housing units has declined due to the poor condition of units and subsequent demolitions.
13	<b>Priority Need Name</b>	AFH: Location of employers
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Middle Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities

	<b>Description</b>	The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.
	<b>Basis for Relative Priority</b>	Access to jobs and job centers is difficult for residents living in most R/ECAPs. Two of the largest job centers are located in western Mobile, which is difficult to access for many Mobile residents.  Stakeholders noted that many residents need additional job skills in order to qualify or successfully keep a job.
<b>14</b>	<b>Priority Need Name</b>	AFH: Quality of public transportation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The availability, type, frequency, and reliability of public transportation affect which households are connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. "Availability" as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go such as jobs, schools, retail establishments, and healthcare. "Type" refers to method of transportation such as bus or rail. "Frequency" refers to the interval at which the transportation runs. "Reliability" includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

	<b>Basis for Relative Priority</b>	The local transit system has limited routes, hours of operation, and infrequent service. Transit service is only available until 9pm on some routes, and 6pm on other routes, impacting the ability of off-peak riders to access services. In addition, transit routes do not reach all major job clusters or assisted housing developments within the city limits.
15	<b>Priority Need Name</b>	AFH: Location and policies of proficient schools
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility. Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.
	<b>Basis for Relative Priority</b>	Mobile's black, non-Hispanic residents, who make up the majority of R/ECAPs, have limited access to quality schools. This has been compounded by local school closings and consolidations.

16	<b>Priority Need Name</b>	AFH: Location of environmental health hazards
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Families with Children Elderly Public Housing Residents Elderly Frail Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	The geographic relationship of environmental health hazards to housing is an important component of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion, and health effects such as asthma, cancer clusters, Appendices Page 216   AFFH Rule Guidebook obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.
	<b>Basis for Relative Priority</b>	A large proportion of affordable housing in Mobile is located near and along the Mobile River, a traditional industrial center. These locations are more likely to be exposed to industrial pollutants due to their proximity to industry.  In addition to pollution, these areas are also likely to be in a flood zone and have experienced severe flooding numerous times in the last 25 years.  Stakeholders also noted that mold and mildew are a common hazard in rental units throughout the city.
17	<b>Priority Need Name</b>	AFH: Access to financial services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	The term “financial services” refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual’s credit and the overall sustainability of homeownership and wealth accumulation.
	<b>Basis for Relative Priority</b>	Home Mortgage Disclosure Act (HMDA) data suggests that white, non-Hispanic individuals in Mobile are more likely to be approved for financing for home loans.  Black, non-Hispanic applicants were nearly twice as likely to be denied for a loan than white, non-Hispanic applicants in 2015  At every income level, white, non-Hispanic buyers made up a significantly larger percentage of loan originations in 2015.  Additionally, stakeholders noted the lack of financial services in R/ECAPs.
<b>18</b>	<b>Priority Need Name</b>	AFH: Affordable units in range of sizes
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Families with Children Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas
	<b>Description</b>	The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children.
	<b>Basis for Relative Priority</b>	There is a greater need for affordable housing units within the city. African American and Hispanic residents have greater needs. 25% of Mobile’s homeowners and 50% of renters spend more than 30% of household income on housing costs (2009-2013 CHAS estimates). Families with children tend to be over represented in housing choice units, represented in public housing and project-based section 8 units, while very few families with children live in other HUD multifamily units.
<b>19</b>	<b>Priority Need Name</b>	AFH: Public housing siting, policies and practices
	<b>Priority Level</b>	High



	<b>Population</b>	Extremely Low Low Moderate Public Housing Residents
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Protected Classes
	<b>Description</b>	The term “siting selection” refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.
	<b>Basis for Relative Priority</b>	Recent Qualified Allocation Plans issued by the State of Alabama’s Housing Finance Authority has included scrutiny on the per unit cost for Low Income Housing Tax Credit developments, including an applicant from within the City of Mobile in 2017 for a rehabilitation project.
<b>20</b>	<b>Priority Need Name</b>	AFH: Public housing admissions and occupancy
	<b>Priority Level</b>	Low

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Protected Classes

	<b>Description</b>	<p>Admissions and occupancy policies and procedures, including preferences in publicly supported housing</p> <p>The term “admissions and occupancy policies and procedures” refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)</li> <li>• Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc.).</li> <li>• Income thresholds for new admissions or for continued eligibility.</li> <li>• Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities.</li> <li>• Occupancy limits.</li> <li>• Housing providers’ policies for processing reasonable accommodations and modifications requests.</li> <li>• Credit policies.</li> <li>• Policies related to criminal records including arrests and convictions</li> <li>• Eviction policies and procedures</li> </ul>
	<b>Basis for Relative Priority</b>	<p>Mobile Housing Board waitlists are separated by housing development versus overall portfolio.</p> <p>The Mobile Housing Board uses a series of local preferences for its Housing Choice and Project-Based Voucher programs. These preferences include income targets, employment status and households including elderly or disabled individuals. These priorities assist in meeting critical needs within the community; however, they can serve to limit access to housing for to some protected populations within the city.</p> <p>Mobile Housing Board uses past criminal records as criteria for admissions.</p>
<b>21</b>	<b>Priority Need Name</b>	AFH: Lack of supportive services
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Middle Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development
<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
<b>Associated Goals</b>	AFH: Access to opportunities
<b>Description</b>	<p>The term “in-home or community-based supportive services” refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals’ knowledge of such supports and their ability to transition to community-based settings.</p>

	<b>Basis for Relative Priority</b>	Affordable options for in-home or community-based supportive services are available throughout Mobile. However, many persons with disabilities are very low income and cannot afford even a modest fee. This group relies on Medicaid Vouchers to cover the cost of care, there is currently a waiting list of over 3,000 to access these vouchers in the state of Alabama.
22	<b>Priority Need Name</b>	AFH: Lack of housing with supportive services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes

	<b>Description</b>	<p>What is “affordable” varies by the circumstances affecting the individual, and includes the cost of housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible.” By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals’ ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool “supportive services” means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.</p>
	<b>Basis for Relative Priority</b>	<p>Stakeholders noted the need for additional affordable options for supportive housing in the region. Resources are limited at the federal, state, and local level to serve persons with disabilities. Many persons with disabilities are very low income and rely on Medicaid and Medicaid Vouchers for assistance. The waitlist for vouchers is over 3,000 in the state of Alabama.</p>
23	<b>Priority Need Name</b>	AFH: Lack of assistance for housing modifications
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Extremely Low  Low  Moderate  Elderly  Elderly  Frail Elderly  Persons with Physical Disabilities</p>

	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes
	<b>Description</b>	The term “housing accessibility modification” refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.
	<b>Basis for Relative Priority</b>	There are very limited resources for individuals and families looking to modify their homes to accommodate an individual with a disability. This is compounded by the age of the housing stock and prevalence of blighted properties in some areas.
24	<b>Priority Need Name</b>	AFH: Lack of assistance for integrated housing
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Middle Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits

	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes
	<b>Description</b>	The integration mandate of the ADA and Olmstead v. L.C., 527 U.S. 581 (1999) (Olmstead) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD’s Statement on the Role of Housing in Accomplishing the Goals of Olmstead, the U.S. Department of Justice’s Statement on Olmstead Enforcement, as well as the U.S. Department of Health and Human Services’ Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination on the basis of source of income; coordination between housing and disability services agencies; increasing the availability of accessible public transportation.
	<b>Basis for Relative Priority</b>	Based on input gathered related to available resources there is a limited availability of resources to fully address these needs.
<b>25</b>	<b>Priority Need Name</b>	AFH: Transportation access - persons w/disabilities
	<b>Priority Level</b>	Low



	<b>Population</b>	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities
	<b>Description</b>	Individuals with disabilities may face unique barriers to accessing transportation, including both public and private transportation, such as buses, rail services, taxis, and para-transit. The term “access” in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.
	<b>Basis for Relative Priority</b>	Stakeholders noted a lack of infrastructure, such as curb cuts and accessible bus stops as a barrier to accessing transit. This is in addition to the lack of access due to limited hours and routes.
26	<b>Priority Need Name</b>	AFH: Regulatory barriers housing and services
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Middle Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities

<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes
<b>Description</b>	<p>These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.</p>
<b>Basis for Relative Priority</b>	<p>These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.</p>

<b>27</b>	<b>Priority Need Name</b>	AFH: Location of accessible housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes

	<b>Description</b>	<p>The location of accessible housing can limit fair housing choice for individuals with disabilities. An important consideration of the location of accessible housing includes the distribution of accessible units throughout the jurisdiction and whether the accessible units are concentrated in a particular area within the jurisdiction. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, lack of familiarity of the building and safety and permitting departments with accessibility standards, or lack of information about affordable accessible housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single-family housing is generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.</p>
	<b>Basis for Relative Priority</b>	<p>The majority of accessible housing is located in western Mobile, which had been developed recently, limiting choice for those with disabilities.</p>
<b>28</b>	<b>Priority Need Name</b>	<p>AFH: Proficient school access persons w/disability</p>
	<b>Priority Level</b>	<p>Low</p>
	<b>Population</b>	<p>Persons with Mental Disabilities  Persons with Physical Disabilities  Persons with Developmental Disabilities</p>
	<b>Geographic Areas Affected</b>	<p>Jurisdiction Corporate City Limits</p>
	<b>Associated Goals</b>	<p>AFH: Access to opportunities  AFH: Protected Classes</p>

	<b>Description</b>	Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA’s requirements and has no barriers to entry for persons with physical mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with physical mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.
	<b>Basis for Relative Priority</b>	Stakeholders noted Mobile County Public Schools has a number of older school buildings, which can pose problems for physical accessibility.
29	<b>Priority Need Name</b>	AFH: Public housing access persons w/disabilities
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to high opportunity areas AFH: Protected Classes

	<b>Description</b>	The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. "Accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of "access" here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with physical mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of "access" here also includes programmatic access, which implicates such policies as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.
	<b>Basis for Relative Priority</b>	In general, there is a lack of affordable housing in Mobile. This impacts those with disabilities at a greater level due to a lack of accessible options throughout the city due to an older housing stock and limited multifamily development.
30	<b>Priority Need Name</b>	AFH: Inaccessible infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Access to opportunities

	<b>Description</b>	Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with physical mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced.
	<b>Basis for Relative Priority</b>	Many of the buildings in Mobile are historic and/or were built before accommodations for persons with disabilities were common. This poses a challenge for those accessing services and looking to buy homes in the city.
31	<b>Priority Need Name</b>	AFH: Lack of resources for fair housing orgs
	<b>Priority Level</b>	High
	<b>Population</b>	Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Fair Housing Awareness AFH: Fair Housing Capacity
	<b>Description</b>	A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness-raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information, which may indicate whether a housing provider is complying with fair housing laws. "Resources" as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.
	<b>Basis for Relative Priority</b>	Local fair housing organizations lack resources for outreach and enforcement activities. Funding continues to decrease for fair housing organizations.

32	<b>Priority Need Name</b>	AFH: Lack of private fair housing outreach/enforce
	<b>Priority Level</b>	High
	<b>Population</b>	Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Fair Housing Awareness AFH: Fair Housing Capacity
	<b>Description</b>	The term “local private fair housing outreach and enforcement” refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement. Examples of activities, among others, these civil rights organizations undertake may include: outreach, education, and training on fair housing issues such as the appropriate application of arrest and criminal conviction records, credit policies, and prior evictions in leasing and lease termination decision making; and fair housing issues affecting LGBT individuals, the application of any state or local law providing specific protection for such individuals, as well as compliance with HUD regulations and guidance relating to such individuals.
	<b>Basis for Relative Priority</b>	Local fair housing organizations lack resources for outreach and enforcement activities. Funding continues to decrease for fair housing organizations.
33	<b>Priority Need Name</b>	AFH: Lack of local public fair housing enforcement
	<b>Priority Level</b>	High
	<b>Population</b>	Large Families Families with Children Elderly



	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Fair Housing Awareness AFH: Fair Housing Capacity
	<b>Description</b>	The term “local public fair housing enforcement” refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.
	<b>Basis for Relative Priority</b>	Local fair housing organizations lack resources for outreach and enforcement activities. Funding continues to decrease for fair housing organizations.
<b>34</b>	<b>Priority Need Name</b>	AFH: Lack of state or local fair housing laws
	<b>Priority Level</b>	Low
	<b>Population</b>	Large Families Families with Children Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits
	<b>Associated Goals</b>	AFH: Fair Housing Capacity AFH: Protected Classes

	<b>Description</b>	State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or “substantially equivalent” to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Though some states and local jurisdiction may have housing laws that are designed to protect survivors of domestic violence, many do not, which impedes their ability to access and maintain their current housing as well as quickly find safe alternative housing. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.
	<b>Basis for Relative Priority</b>	The State of Alabama’s fair housing law, passed in 2006 (Alabama Code Title 24. Housing § 24-8-4) establishes protected characteristics including race, color, religion, sex, familial status, or national origin and in some cases disability.  In 2015, the Mobile City Council passed Ordinance No. 28-090-2015, amending Chapter 28, Article III, Discrimination in Housing to include the following protected classes; race, sex, color, religion, national origin, ancestry, familial status, handicap, age, military status, ethnicity, marital status, gender identity or expression, or sexual orientation.  Neither the State nor City laws include protections for survivors of domestic violence
<b>35</b>	<b>Priority Need Name</b>	Homelessness
	<b>Priority Level</b>	High
	<b>Population</b>	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	Jurisdiction Corporate City Limits

<b>Associated Goals</b>	Homelessness
<b>Description</b>	Primary drivers of homelessness in Mobile are stagnation/decreasing wages combined with a lack of affordable housing options. Without a high functioning transit system, these two problems are siloed and exacerbated, resulting in higher pressure on organizations and facilities providing services for homeless and chronically homeless individuals and families.
<b>Basis for Relative Priority</b>	Data collected during the 2017 Point in Time Count demonstrates a need for housing and services to combat homelessness in the community. In January of 2017 volunteers counted 606 homeless individuals of which 12.9% were families, 11.7% had mental health issues, 14.8% were disabled, and 6.1% had been victims of domestic violence.  These figures provide some insight into the homeless population in Mobile, however they do not reflect those persons that are doubling up in housing or sleeping on couches (overcrowding).

**Narrative (Optional)**

The City of Mobile is currently trying to address a backlog of infrastructure needs and is investing in infrastructure throughout the city. However, the resources available do not meet the needs of the community. There is also a need for major investment in the communities surrounding public housing units and the units themselves. Mobile’s public housing stock is out of date and in some instances requiring capital improvements. Stakeholders identified the need for expanded transit services to increase the frequency and hours of service. The Mobile County School District has closed and restructured schools located in low income communities, limiting access to neighborhood schools.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Market characteristics suggest there is a need for high-quality affordable housing units in Mobile. According to HUD, 42% of households in Mobile are below 80% of the HUD Area Median Family Income, and 14.7% of this population is very-low-income (<30% HAMFI). Very-low-income renter households are most likely to live in substandard housing and face a housing cost burden greater than 50% of income. As the Mobile Housing Board moves forward to redevelop aged and dilapidated units, access to affordable rental units will continue to be limited. Currently, the Mobile Housing Board has a waiting list of 3,346 for public housing units and vouchers.
TBRA for Non-Homeless Special Needs	Similar to the need for Tenant Based Rental Assistance, market conditions suggest there is a need for high-quality affordable rental units for residents with special needs. In addition to finding a safe and affordable place to live, these households are also in need of affordable healthcare and mental health services.
New Unit Production	Market conditions indicate the need for new rental and ownership units in a variety of sizes and levels of affordability. There are 10,040 renter households and 4,825 owner households that have one or more of four housing problems, including overcrowding, substandard, and housing cost burden. Cost burden is the most common housing problem for households earning less than 100%. However, other conditions provide insight into the types of housing needed. Crowding is most prevalent in single family households, denoting the need for larger affordable units.
Rehabilitation	The age and condition of housing stock in Mobile suggests a need for rehabilitation activities. The majority of housing stock is over 30 years old. According to the 2009-2013 CHAS data, 72% of owner-occupied housing and 68% of renter-occupied housing was built before 1980. As noted above, cost burden is the most common housing problem, indicating that many homeowners do not have additional funds to adequately maintain and repair their properties. Elderly owner households are 35% of owner households with severe cost burden and are likely to face additional challenges securing resources to make units accessible and complete regular maintenance.
Acquisition, including preservation	The City of Mobile is currently working with a firm to complete a Housing plan in the Spring of 2018. The report will include a market analysis of neighborhoods and identify potential interventions, including redevelopment or rehabilitation.

**Table 50 – Influence of Market Conditions**



**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,347,011	1,175,551	0	3,522,562	8,860,000	The City of Mobile uses CDBG funds to develop and renovate affordable housing, remove blight, and provide services to youth, the elderly and persons with disabilities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	862,989	80,000	0	942,989	2,700,000	The City of Mobile uses HOME funds to provide financial assistance to first time homebuyers and develop affordable housing units
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	193,122	0	0	193,122	764,000	The City of Mobile provides local homeless service providers with funds to perform outreach, provide shelter, and prevent homelessness.

Table 51 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Community and Housing Development Department has commissioned a Housing Plan to identify opportunities to tailor investments to address blight and strengthen markets throughout Mobile. The plan will provide an overview of major ongoing and planned investments and strategies to leverage these investments to stabilize neighborhoods and address blight.

The Mobile Neighborhood Renewal Program continues to identify blighted and vacant properties that are eligible for the program which clears the title on abandoned and tax delinquent properties. The goal of the program is to either stabilize the property or put it back into commerce, depending on market conditions. Working with local developers, the City will leverage these properties to improve market conditions and housing stock.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

As outlined in the Assessment of Fair Housing Goals and Strategies, the City of Mobile will complete land analysis to identify existing underutilized, city owned parcels that could be used to subsidize housing and community development activities. Additionally, properties in the Neighborhood Renewal Program outlined above will be used to stabilize and improve neighborhoods.

**Discussion**



## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction

**Table 52 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

Throughout the Assessment of Fair Housing and Consolidated Plan process, stakeholders identified the strength and dedication of the local community development practitioners. Many noted the importance of strong working relationships and the willingness of community leaders to work together to tackle big community development issues. The success of local economic development efforts to attract new jobs was also a common answer among respondents. Overall, there was a level of optimism surrounding the ability to attract companies such as Airbus, Walmart, and Amazon.

While stakeholders identified the leadership of the community development committee as an asset, many felt that bringing leaders together from various organizations was a challenge. As federal and local funding continues to decline, stakeholders stressed the need to provide coordinated services to continue to serve community members.

Stakeholders also identified a disconnect between service providers and community members in need. The development patterns of the city are also reflected in the location of service providers. As development moved west of Highway 65, many service providers were able to find affordable office space in close proximity to amenities. Lack of public transportation has created a gap between service providers west of Highway 65 and community members in need of services located east of Highway 65.

In addition to the lack of direct funding, affordable housing developers identified challenges in accessing sustainable financing, market challenges, and restrictive zoning policies. Community opposition to development was another challenge affordable housing developers consistently face across the city.

To bring community development organizations together and improve coordination, the City of Mobile has set goals through the AFH process. The Community and Housing Development Department will engage city and regional stakeholders and government agencies to both review fair housing needs and

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			

**Table 53 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The City of Mobile is a participating jurisdiction in the HUD designated City and County of Mobile and Baldwin County Continuum of Care (CoC). Housing First, Inc., the lead organization, submits an annual application for HUD McKinney-Vento Homeless Assistance Acts programs on behalf of the three jurisdictions. Housing First, Inc. provides homelessness assistance in three main service areas: Community Housing, Homeless Prevention, and Homeless Management Information System. The

Community Housing Program provides Permanent Supportive Housing to individuals and families in Mobile who are experiencing homelessness and who have a disabling condition. This program assists participants in transitioning from homelessness to being housed and encourages clients to become self-sufficient through a variety of supportive services. The Community Housing Program is a “scattered site” program. The program leases individual apartment units in the community in order to place individuals or family participants. Small monthly rental fees are charged based upon income.

Housing First’s Homeless Prevention Department aids individuals and families who are experiencing homelessness or at imminent risk of homelessness. Three federal grants are used to carry out this work: Supportive Services for Veteran Families (SSVF), Emergency Solutions Grant (ESG) and the Continuum of Care (CoC) funds. The ESG program provides short-term and medium-term assistance to rapidly re-house homeless and prevent homelessness. The CoC program funds the Family Solutions Grant and Family Youth Solutions Grant, which are dedicated to assist families and unaccompanied youth obtain stable permanent housing by providing temporary rental assistance.

Housing First, Inc. also administers the Homeless Management Information System (HMIS). HMIS is the system designated for HUD’s data collection, management, and reporting standards. It is used to collect client-level data and data on housing and services provided.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The Continuum of Care (CoC), with Housing First Inc. as the lead agency, coordinate efforts to eliminate homelessness in collaboration with community-based partners. The CoC works closely with local and regional government, including the City of Mobile and Mobile County, service providers, religious entities, and other community partners to provide supportive services to the homeless population.

In addition to the lack of funding for services, many of the overarching community development issues in Mobile are obstacles to eliminating homelessness in the community. There is a lack of access to affordable housing, transportation and healthcare for low-moderate income residents of Mobile, making households vulnerable to becoming homeless. Additionally, those that are homeless or at risk of becoming homeless have a wide variety of needs, making it difficult to provide all of the services households may need to become stable and find housing and/or employment.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

- Decentralizing the CoC system from one provider and encouraging other providers to join the CoC as active members.
- Improve public transportation system.

- Develop more affordable housing and target more units to persons and households at 0 to 50% of AMI.
- Expand employment and job training opportunity for the homeless population.
- Provide health care services to the homeless, including healthy eating education and wellness programs.
- Identify at-risk persons and households (low income persons, unemployed, victims of domestic violence, people with mental illness and disabilities) and make appropriate referrals.
- Provide life skills training, literacy training, tutorial, and parenting training to homeless families.
- Reduce the instances of blighted property through rehabilitation, demolition, and/or redevelopment.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	AFH: Fair Housing Awareness	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lack of resources for fair housing orgs AFH: Lack of private fair housing outreach/enforce AFH: Lack of local public fair housing enforcement	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 2 Other
2	AFH: Zoning Code Recommendations	2018	2022	Affordable Housing Non-Housing Community Development	City-wide	AFH: Land use and zoning laws AFH: Occupancy codes and restrictions	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 1 Other
3	AFH: Increase Coordination	2018	2022	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of public investments in specific areas AFH: Lack of local or regional cooperation	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 3 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	AFH: Access to high opportunity areas	2018	2022	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of housing with supportive services AFH: Lack of assistance for housing modifications AFH: Lack of assistance for integrated housing AFH: Regulatory barriers housing and services AFH: Location of accessible housing AFH: Public housing access persons w/disabilities	CDBG: \$12,195,862 HOME: \$3,642,989 ESG: \$0	Rental units constructed: 50 Household Housing Unit  Rental units rehabilitated: 25 Household Housing Unit  Homeowner Housing Added: 12 Household Housing Unit  Homeowner Housing Rehabilitated: 365 Household Housing Unit  Direct Financial Assistance to Homebuyers: 150 Households Assisted  Other: 6 Other
	Consolidated Plan				MOBILE		146	



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	AFH: Fair Housing Capacity	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lack of resources for fair housing orgs AFH: Lack of private fair housing outreach/enforce AFH: Lack of local public fair housing enforcement AFH: Lack of state or local fair housing laws	CDBG: \$50,000 HOME: \$0 ESG: \$0	Other: 2 Other



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	AFH: Protected Classes	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lending discrimination AFH: Community opposition AFH: Public housing siting, policies and practices AFH: Public housing admissions and occupancy AFH: Lack of housing with supportive services AFH: Lack of assistance for housing modifications AFH: Lack of assistance for integrated housing AFH: Regulatory barriers housing and services AFH: Location of accessible housing AFH: Proficient school access persons w/disability AFH: Public housing access persons w/disabilities AFH: Lack of state or local fair housing laws	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 4 Other
	Consolidated Plan				MOBILE		149	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	AFH: Regional Coordination	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of local or regional cooperation	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 1 Other
9	Homelessness	2018	2022	Homeless	City-wide	Homelessness	CDBG: \$0 HOME: \$0 ESG: \$957,122	Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted  Homeless Person Overnight Shelter: 1375 Persons Assisted  Homelessness Prevention: 1875 Persons Assisted

Table 54 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	AFH: Fair Housing Awareness
	<b>Goal Description</b>	Increase community engagement related to fair housing awareness and planning. Planned activities include participating in fair housing month, community development week and actively encouraging community planning activities.
2	<b>Goal Name</b>	AFH: Zoning Code Recommendations
	<b>Goal Description</b>	Recommend revisions to zoning code to increase access to affordable housing. Potential recommendations include provisions to incentivize affordable housing, strategies to eliminate barriers to the construction of affordable housing, reducing lot size minimums, and increased density limits.
3	<b>Goal Name</b>	AFH: Increase Coordination
	<b>Goal Description</b>	Increase coordination with City Departments and City/Regional Entities. Potential activities include programmatic opportunities to invest in historic properties, analyze underutilized and vacant city-owned land for affordable housing development opportunities, increase coordination with fair housing and community development activities.
4	<b>Goal Name</b>	AFH: Access to high opportunity areas
	<b>Goal Description</b>	Provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and track affordable housing developments to inform planning efforts.
5	<b>Goal Name</b>	AFH: Access to opportunities
	<b>Goal Description</b>	Reduce disparities in access to opportunities. Potential activities include workforce development and job training, improve access to transit, increase affordable housing near high-quality schools, and target Section 3 and women and minority-owned businesses for City contracts.
6	<b>Goal Name</b>	AFH: Fair Housing Capacity
	<b>Goal Description</b>	Increase fair housing capacity in conjunction with the Center for Fair Housing. Planned activities include fair housing training sessions to increase fair housing awareness.

7	<b>Goal Name</b>	AFH: Protected Classes
	<b>Goal Description</b>	Pursue practices to eliminate structural and individual bias towards members of protected classes. Potential activities include reviewing affirmatively fair marketing guidelines, analyzing listings for fair housing violations, and coordinating with Mobile Housing Board.
8	<b>Goal Name</b>	AFH: Regional Coordination
	<b>Goal Description</b>	Improve regional coordination by establishing a regional fair housing working group.
9	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

We anticipate assisting the following households:

- 30 low and moderate-income households through the rehabilitation of owner-occupied homes and tenant-occupied rental property with CDBG funds
- 20 moderate-income households through the provision of down payment and closing cost assistance for eligible homebuyers with HOME funds
- 2 low-income households through new or rehabilitated HOME-assisted units
- 10 extremely low-income households through the provision of ESG rental assistance
- 600 extremely low-income individuals and households through the provision of overnight shelter through an ESG-assisted homeless facility

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The Mobile Housing Board is complying with Section 504 regulations and the Architectural Barriers Act by redesigning a number of public housing units to meet the needs of the physically impaired, as well as the visually and hearing impaired.

### **Activities to Increase Resident Involvements**

The Mobile Housing Board engages residents on a number of levels. Resident input was a major component of the Choice Neighborhood Planning efforts, which established visions for the future of the Thomas James Place | Southside Neighborhoods and Roger Williams Homes | Three Mile Trace Neighborhood. On an ongoing basis, resident associations provide leadership in each public housing neighborhoods. The Mobile Housing Board also provides services aimed at building the skills of residents and encouraging self-sufficiency through GED tutoring, small business development workshops, and the SWEET-P summer jobs program which provides job training for residents 16-23. The Mobile Housing Board also manages the Senior Wellness Program and Family Self-Sufficiency Program which provide the following services and activities:

- Case management
- Transportation
- Wellness programs
- Employment opportunities
- Computer access

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

Yes

### **Plan to remove the ‘troubled’ designation**

The City of Mobile will provide ongoing support to the Mobile Housing Board as the organization continues to implement efforts to improve the quality of housing units and overall operations.

The Mobile Housing Board is working to address its ‘troubled’ designation through the implementation of its Housing Transformation Plan 2020. The Plan seeks to reposition and replace MHB’s aging housing stock to provide new and substantially rehabilitated quality units in communities situated throughout North, Downtown, Midtown, and South Mobile. MHB also seeks, to a smaller extent, to spur high quality affordable housing in other parts of the city.

In order to meet these objectives, MHB plans to use HUD's Rental Assistance Demonstration Program, the Alabama Housing Finance Agency's Low Income Housing Tax Credit program, resources to Section 18 Demolition/Disposition protocols, and other Project-based Voucher programs. In support of this transformative plan, the City of Mobile has made a financial commitment to funding Mobile Housing Board's current LIHTC proposal if awarded.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

Barriers to affordable housing were identified throughout the Assessment of Fair Housing and Consolidated Plan Process.

**Local Government Funding:** While the City of Mobile has provided general funds to support infrastructure development, State law prevents the City from making general funds available for housing grants and loans.

**Tax Delinquent property:** The process for obtaining clear and marketable titles to tax delinquent properties has improved as the City and State have moved forward with policy reforms. However, the prevalence of heir properties and resources needed to clear these titles limits the City's ability to move these properties through the process quickly and efficiently. As a result, too many tax delinquent properties that could be redeveloped for affordable housing sit vacant and serve as blight on the neighborhoods.

**Zoning and Land Use:** Current zoning strongly favors single family housing development, coupled with community opposition to multifamily development, this poses challenges for building multi-family developments across the city, but especially in neighborhoods of opportunity. Zoning regulations too often impose standards for site development that increase the cost of housing. This is particularly true, and unnecessary, in older inner-city neighborhoods where lots have been historically smaller and housing patterns more dense. The connotation that smaller lots and more densely populated neighborhoods is bad, along with certain zoning regulations, has hampered revitalization in some neighborhoods.

**Lack of Public Investments:** The City is currently working to address infrastructure needs across the city, however, the need exceeds the amount of resources available. Areas around public housing developments need additional access to resources and funding for revitalization, the housing stock is out of date and in need of capital improvements.

**Lack of Regional Cooperation:** Stakeholders identified the need for additional coordination between local and regional government service providers to efficiently use limited resources.

**Limited Access to Opportunity:** Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, fostering disparities in access to jobs, affordable transportation and educational opportunities.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The City of Mobile's Assessment of Fair Housing outlines strategies to address issues of fair housing, which directly impact access to affordable housing. The following is an overview of cross cutting strategies.

### **Recommend revisions to zoning code to increase access to affordable housing**

The City is currently revising its land use plan and is scheduled to update its zoning code within the next year. Through this process the Community and Housing Development Department will recommend changes to enable the development of smaller housing units and multi-family properties, and incentivize the construction of affordable and supportive housing developments.

### **Increase coordination with City Departments and City/Regional Entities**

Working with the Mobile Housing Board, school district and other agencies the Community and Housing Development Department will conduct an analysis of vacant or underutilized publicly owned properties that may be used for affordable housing and community development activities. In addition, the Department will develop a strategy for incorporating affordable housing into historic districts and other communities of opportunity. The City will actively participate in fair housing coordination with local and regional stakeholders and City/County agencies and departments.

### **Provide more housing in areas of high opportunity and reduce barriers to affordable housing**

Stakeholder interviews identified the need for quality, affordable housing throughout the city. The City should preserve existing affordable housing developments in neighborhoods that are at risk of displacement or gentrification. In addition, the City should support and pursue affordable housing development in high opportunity areas.

### **Reduce disparities in access to opportunities**

Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, the City will continue to target investments to increase resources east of I-65 and support the development of affordable housing west of I-65.

### **Increase fair housing capacity**

The City of Mobile will expand awareness of fair housing needs and rights among stakeholder organizations and the community overall. This will include providing technical assistance and capacity building to area nonprofit organizations and the Center for Fair Housing to expand fair housing training and awareness.



## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City of Mobile coordinates with the Continuum of Care for Mobile County and Baldwin County and provides services providers with funding through the Emergency Solutions Grant (ESG) to assist homeless persons, including unsheltered persons. Housing First, Inc., the Lead Agency in Mobile, funds service providers, provides direct services, and manages the Homeless Management Information System for the CoC. The Coordinated Entry staff are regularly on site at local food pantries and at meal service locations to engage new households and provide awareness of the coordinated entry system. A dedicated field Intake Specialist is tasked with outreaching to and serving street homeless individuals throughout the service area. They also regularly visit known encampments and other locations where individuals less likely to utilize formal supports may be found.

In addition to outreach conducted by the Coordinated Entry staff, the community has expanded efforts to expand awareness of homelessness in the region. In partnership with City of Mobile, the CoC, service providers, private citizens, and businesses participated in a Homeless Summit to raise awareness, connect organizations and provide outreach resources. These efforts expand the network for individuals and organizations to seek assistance for homeless persons.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City of Mobile will continue to allocate funds to service providers to provide emergency and transitional housing services to homeless persons through ESG funding.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City of Mobile will continue to allocate funds to service providers that provide shelter and services for women with children, families with children and women and children who have escaped domestic violence situations through ESG funding.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City of Mobile will continue to allocate funding to service providers that provide resources to individuals and families who may become homeless including workforce development programs, educational programs for youth, services for seniors, and legal services. In addition to funding through CDBG and ESG, the Continuum of Care has dedicated resources to provide services to ex-offenders and persons with disabilities.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City of Mobile is working to address blight and rehabilitate housing in areas of the city with older housing stock, including the CDBG target areas. When undertaking demolition and rehabilitation activities, projects are managed by contractors and non-profit staff that are certified in lead safe work practices.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

Limited funding for lead abatement activities and outreach pose a challenge for the City to fully address lead poisoning. However, both the City of Mobile and the Mobile Housing Board will continue to remediate lead hazards through demolition and rehabilitation of units throughout the city.

### **How are the actions listed above integrated into housing policies and procedures?**

The City's lead-based hazard program is integrated into the City's HOME Manual and home owner rehabilitation program under the CDBG Rehab Policies. State certified and licensed lead contractors are awarded the contract through a competitive bid process to do the lead work for the homeowner home improvement program.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The City of Mobile continues to support economic development by investing infrastructure through the Capital Improvement Plan, building capacity of local businesses through the Office of Supplier Diversity, and engaging in major planning efforts, including Map for Mobile and an overhaul of local zoning codes. The City also supports efforts of local and regional partners and economic development partners such as the Mobile Area Chamber of Commerce, Alabama Department of Economic and Community Affairs, Economic Development Partnership of Alabama, Port of Mobile, Mobile Aeroplex at Brookley, Alabama Power Company, MobileGas, and the University of South Alabama.

Another goal is to reduce disparities in access to opportunities. The City will continue to support activities to increase workforce development and job training, improve access to transit, increase affordable housing near high-quality schools, and target Section 3 and women and minority-owned businesses for City contracts.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

Provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and tracking affordable housing developments to inform planning efforts.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City of Mobile will continue to implement and improve current monitoring practices of CDBG, HOME, and ESG activities to ensure compliance throughout the scope of the projects and funding cycle. Mobile's Community and Housing Development Department oversees the identification, procurement, and implementation of projects and funding sources with developers and non-profit organizations. Subrecipients are monitored on an ongoing basis, including regular reporting, on-site visits, and verification of record keeping in accordance with policies and procedures established by the Community and Housing Development Department.

The Community and Housing Development Department works closely with other departments, including Contract Compliance Officers to ensure contracts are performed in accordance with federal Labor Standards and Section 3 requirements.

The Community Planning and Development Department monitors federally-funded projects that are implemented by other City Departments through a simple project tracking and management reporting system. This process includes monthly management reports, inter-departmental updates and meetings, closeout and financial reports. Project expenditures are compared with budgets during draws and on a monthly basis.

Working with the Office of Supplier Diversity, the Community and Housing Development Department works to identify disadvantaged business enterprises (DBE), service-disabled veteran owned, women owned business (WBE), and small businesses (SBE) to participate in community development activities. The Office of Supplier Diversity exists to help DBEs overcome challenges. The programs and services provided through the Office of Supplier Diversity are a direct response by the City of Mobile to help DBE firms overcome challenges while helping to build a better Mobile.

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,347,011	1,175,551	0	3,522,562	8,860,000	The City of Mobile uses CDBG funds to develop and renovate affordable housing, remove blight, and provide services to youth, the elderly and persons with disabilities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	862,989	80,000	0	942,989	2,700,000	The City of Mobile uses HOME funds to provide financial assistance to first time homebuyers and develop affordable housing units
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	193,122	0	0	193,122	764,000	The City of Mobile provides local homeless service providers with funds to perform outreach, provide shelter, and prevent homelessness.

Table 55 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Community and Housing Development Department has commissioned a Housing Plan to identify opportunities to tailor investments to address blight and strengthen markets throughout Mobile. The plan will provide an overview of major ongoing and planned investments and strategies to leverage these investments to stabilize neighborhoods and address blight.

The Mobile Neighborhood Renewal Program continues to identify blighted and vacant properties that are eligible for the program which clears the title on abandoned and tax delinquent properties. The goal of the program is to either stabilize the property or put it back into commerce, depending on market conditions. Working with local developers, the City will leverage these properties to improve market conditions and housing stock.



**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

As outlined in the Assessment of Fair Housing Goals and Strategies, the City of Mobile will complete land analysis to identify existing underutilized, city owned parcels that could be used to subsidize housing and community development activities. Additionally, properties in the Neighborhood Renewal Program outlined above will be used to stabilize and improve neighborhoods.

**Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	AFH: Fair Housing Awareness	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lack of resources for fair housing orgs AFH: Lack of private fair housing outreach/enforce AFH: Lack of local public fair housing enforcement	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 3 Other
2	AFH: Zoning Code Recommendations	2018	2022	Affordable Housing Non-Housing Community Development	City-wide	AFH: Land use and zoning laws AFH: Occupancy codes and restrictions	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	AFH: Increase Coordination	2018	2022	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of public investments in specific areas AFH: Lack of local or regional cooperation	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 3 Other
4	AFH: Access to high opportunity areas	2018	2022	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of assistance for housing modifications	CDBG: \$2,197,289 HOME: \$894,156	Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 85 Household Housing Unit Direct Financial Assistance to Homebuyers: 30 Households Assisted Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	AFH: Access to opportunities	2018	2022	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of public investments in specific areas AFH: Lack of private investments in neighborhoods AFH: Lack of community revitalization strategies AFH: Location and type of affordable housing AFH: Private discrimination AFH: Location of employers AFH: Quality of public transportation AFH: Location and policies of proficient schools AFH: Location of environmental health hazards AFH: Access to financial services AFH: Lack of supportive services AFH: Transportation access - persons w/disabilities AFH: Inaccessible infrastructure	CDBG: \$273,500 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted Businesses assisted: 5 Businesses Assisted Other: 4 Other
	Consolidated Plan				MOBILE		168	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	AFH: Fair Housing Capacity	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lack of resources for fair housing orgs AFH: Lack of private fair housing outreach/enforce AFH: Lack of local public fair housing enforcement	CDBG: \$10,000 HOME: \$0 ESG: \$0	Other: 1 Other
7	AFH: Protected Classes	2018	2022	Affordable Housing Non-Homeless Special Needs	City-wide	AFH: Lending discrimination AFH: Community opposition AFH: Public housing siting, policies and practices AFH: Public housing admissions and occupancy	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 4 Other
8	AFH: Regional Coordination	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	AFH: Lack of local or regional cooperation	CDBG: \$0 HOME: \$0 ESG: \$0	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Homelessness	2018	2022	Homeless	City-wide	Homelessness	CDBG: \$0 HOME: \$0 ESG: \$181,739	Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 275 Persons Assisted Homelessness Prevention: 375 Persons Assisted

Table 56 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	AFH: Fair Housing Awareness
	<b>Goal Description</b>	Increase community engagement related to fair housing awareness and planning. Planned activities include participating in fair housing month, community development week and active encouragement in community planning activities.
2	<b>Goal Name</b>	AFH: Zoning Code Recommendations
	<b>Goal Description</b>	Recommend revisions to zoning code to increase access to affordable housing. Potential recommendations include provisions to incentivize affordable housing, strategies to eliminate barriers to the construction of affordable housing, reducing lot size minimums, and increased density limits.
3	<b>Goal Name</b>	AFH: Increase Coordination
	<b>Goal Description</b>	Increase coordination with City Departments and City/Regional Entities. Potential activities include programmatic opportunities to invest in historic properties, analyze underutilized and vacant city-owned land for affordable housing development opportunities, increase coordination with fair housing and community development activities.

4	<b>Goal Name</b>	AFH: Access to high opportunity areas
	<b>Goal Description</b>	Provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and tracking affordable housing developments to inform planning efforts.
5	<b>Goal Name</b>	AFH: Access to opportunities
	<b>Goal Description</b>	Reduce disparities in access to opportunities. Potential activities include workforce development and job training, improve access to transit, increase affordable housing near high-quality schools, and target Section 3 and women and minority-owned businesses for City contracts.
6	<b>Goal Name</b>	AFH: Fair Housing Capacity
	<b>Goal Description</b>	Increase fair housing capacity in conjunction with the Center for Fair Housing. Planned activities include fair housing training sessions to increase fair housing awareness.
7	<b>Goal Name</b>	AFH: Protected Classes
	<b>Goal Description</b>	Pursue practices to eliminate structural and individual bias towards members of protected classes. Potential activities include reviewing affirmatively fair marketing guidelines, analyzing listings for fair housing violations, and coordinating with Mobile Housing Board.
8	<b>Goal Name</b>	AFH: Regional Coordination
	<b>Goal Description</b>	Improve regional coordination by establishing a regional fair housing working group.
9	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.





## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Mobile's CHD Department has prioritized projects that will address blight and the need for funds to perform renovations on multiple scales due to an aging housing stock and limited resources. In addition to these projects, HOME funds will prioritize Down Payment Assistance to increase homeownership throughout the city. ESG funds will focus on providing services and shelter to homeless individuals and families.

#### Projects

#	Project Name
1	Slum and Blight Removal
2	City-wide Float Loan Program
3	CHD - Housing Rehabilitation
4	Residential Rehabilitation Loans
5	Public Services
6	HESG18 City of Mobile
7	CHDO Affordable Housing
8	Down Payment Assistance
9	Affordable Housing: Homebuyer/Rental
10	Section 108 Loan Repayment
11	CDBG Planning and Administration
12	HOME Planning and Administration

Table 57 – Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

In its planning for the 2018 program year, the CHD Department looked at completed programs and ongoing programs that still had funds available from prior years. The CHD-administered homeowner rehabilitation programs continue to be in high demand which reflects both the age and deteriorated condition of Mobile's housing stock and the fact that many of these houses are owned and occupied by low and moderate-income households. For the 2018 program year, the focus will continue to shift toward blight reduction and owner-occupied rehabilitation assistance. Due to the high demand, most rehabilitations will be limited to \$10,000. The cap for any housing rehab will remain at \$25,000 to plan for unforeseen items. The City is transitioning to a different intake process that will prioritize active code violations for rehab. The City also intends to continue its work with local non-profits to do exterior paint work, with a limit of \$5,000 per house, on residences. The volunteer program is using lead safe work

practices, which mitigates lead hazards in a safe and affordable manner, allowing the City to complete more projects.

In the HOME program, the City continues to focus funds on affordable homebuyer activities. The program encourages residents of Mobile and those interested in moving to Mobile an opportunity to purchase an affordable home within the city. As the City encourages growth and prosperity through investments in infrastructure, economic development activities, and a focus on addressing blight, the housing market is gaining strength. Investing in homeownership incentives will continue to support the market and capture property tax revenue as more households purchase homes in Mobile. HOME funds may also be used to invest in strategic multifamily opportunities as they present themselves.

The City of Mobile continues to face challenges with a lack of affordable housing, an aging housing stock in low and moderate-income areas, and a lack of investment in low/mod areas. Also, many federal resources continue to shrink while the demand for services continues to rise. There is also the ongoing challenge of finding organizations with the capacity and experience to carry out housing projects.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Slum and Blight Removal
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of assistance for housing modifications
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Removal of Slum and Blight within the Mobile City Limits
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Residents of low/moderate income neighborhoods
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Buildings Demolished, Rental units rehabilitated, Homeowner Housing Rehabilitated. Activities limited to \$20,000 per unit in assistance.
<b>2</b>	<b>Project Name</b>	City-wide Float Loan Program
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes
	<b>Funding</b>	CDBG: \$1,000,000

	<b>Description</b>	Float Loan Program funds will be available for economic development, slum/blight removal, low/moderate income housing, and infrastructure. Applications will be available to the public. Float loan applications will be qualified as they are received. The current projected float loan capacity is \$1,000,000. The capacity will be adjusted in accordance with the City's approved Citizen Participation Plan if necessary. All loan approvals will require a letter of credit from a qualified lending institution prior to final approval. The term for float loans will be limited to the HUD requirement of 30 months.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Facade treatment/business building rehabilitation, Public Facility or Infrastructure Activities for Low/Moderate Income Housing or Area Benefit , Rental units rehabilitated, Homeowner Housing Added through reuse or rehabilitation, Homeowner Housing Rehabilitated , Buildings Demolished. Individual loans limited to \$1,000,000.
<b>3</b>	<b>Project Name</b>	CHD - Housing Rehabilitation
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of assistance for housing modifications
	<b>Funding</b>	CDBG: \$836,550
	<b>Description</b>	Homeowner Housing Rehabilitated, Housing Program Delivery costs associated with Housing Programs, Hurricane Fortified Roofing activities on owner-occupied houses, Volunteer exterior paint activities on residential properties

	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income homeowners
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Homeowner Housing Rehabilitated, Housing Program Delivery costs associated with Housing Programs, Hurricane Fortified Roofing activities on owner-occupied houses, Volunteer exterior paint activities on residential properties. Individual activities limited to \$25,000 in assistance.
4	<b>Project Name</b>	Residential Rehabilitation Loans
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of assistance for housing modifications
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Homeowner Housing Rehabilitated, Rental units rehabilitated
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Homeowner Housing Rehabilitated, Rental units rehabilitated. Individual activities limited to \$200,000 per program year funding.
5	<b>Project Name</b>	Public Services
	<b>Target Area</b>	City-wide

	<b>Goals Supported</b>	AFH: Access to opportunities
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Lack of private investments in neighborhoods AFH: Lack of community revitalization strategies AFH: Private discrimination AFH: Location of employers AFH: Quality of public transportation AFH: Location and policies of proficient schools AFH: Location of environmental health hazards AFH: Lack of supportive services AFH: Transportation access - persons w/disabilities AFH: Inaccessible infrastructure
	<b>Funding</b>	CDBG: \$273,500
	<b>Description</b>	Public service activities
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income individuals
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	A variety of public services for low and moderate-income residents and communities. Individual and cumulative activities limited to the 15% cap as described by HUD.
6	<b>Project Name</b>	HESG18 City of Mobile
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$193,122
	<b>Description</b>	Provide housing, financial assistance, and services to homeless persons or those at risk of becoming homeless.
	<b>Target Date</b>	6/30/2019

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeless individuals and families Those at-risk of becoming homeless
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Tenant-based rental/Rapid Rehousing, Homeless Person Overnight Shelter, Overnight/Emergency Shelter/Transitional Housing Beds added, Homelessness Prevention, Other. Individual activities limited to \$193,122.
<b>7</b>	<b>Project Name</b>	CHDO Affordable Housing
	<b>Target Area</b>	Neighborhood Revitalization Strategy Target Area City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes AFH: Lack of assistance for housing modifications
	<b>Funding</b>	HOME: \$141,500
	<b>Description</b>	Rehabilitation or new construction of affordable housing units to be completed by a CHDO.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Rental units constructed, Homeowner Housing Added. Individual activities limited to the current HOME subsidy limit.
<b>8</b>	<b>Project Name</b>	Down Payment Assistance
	<b>Target Area</b>	Neighborhood Revitalization Strategy Target Area City-wide



	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes
	<b>Funding</b>	HOME: \$150,000
	<b>Description</b>	Down Payment and Closing cost assistance of up to \$100,000 for eligible low and moderate-income homebuyers.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Direct Financial Assistance to Homebuyers. Individual activities limited to \$100,000.
9	<b>Project Name</b>	Affordable Housing: Homebuyer/Rental
	<b>Target Area</b>	Neighborhood Revitalization Strategy Target Area City-wide
	<b>Goals Supported</b>	AFH: Access to high opportunity areas
	<b>Needs Addressed</b>	AFH: Location and type of affordable housing AFH: Community opposition AFH: Displacement due to economic pressure AFH: Affordable units in range of sizes
	<b>Funding</b>	HOME: \$558,683
	<b>Description</b>	Rental units constructed, Homeowner Housing Added, Direct Financial Assistance to Homebuyers
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households

	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Rental units constructed, Homeowner Housing Added, Direct Financial Assistance to Homebuyers. Individual activities limited to the current HOME subsidy limit per unit as described by HUD.
<b>10</b>	<b>Project Name</b>	Section 108 Loan Repayment
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Access to opportunities
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas
	<b>Funding</b>	CDBG: \$364,000
	<b>Description</b>	Planned Repayment of Section 108 Loans
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Planned Repayment of Section 108 Loans. Individual activities limited to the actual amount due for Section 108 Loan Repayments. This amount may slightly be adjusted for interest.
<b>11</b>	<b>Project Name</b>	CDBG Planning and Administration
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Fair Housing Awareness AFH: Zoning Code Recommendations AFH: Increase Coordination AFH: Access to high opportunity areas AFH: Access to opportunities AFH: Fair Housing Capacity AFH: Protected Classes AFH: Regional Coordination
	<b>Needs Addressed</b>	AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Displacement due to economic pressure AFH: Lack of assistance for housing modifications

	<b>Funding</b>	CDBG: \$648,512
	<b>Description</b>	Administration of the CDBG Program, including planning activities
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administration of the CDBG Program, including planning activities. Individual activities limited to the 20% cap as described by HUD.
<b>12</b>	<b>Project Name</b>	HOME Planning and Administration
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	AFH: Increase Coordination AFH: Access to high opportunity areas AFH: Access to opportunities
	<b>Needs Addressed</b>	AFH: Lack of public investments in specific areas AFH: Location and type of affordable housing AFH: Community opposition AFH: Deteriorated and abandoned properties AFH: Affordable units in range of sizes
	<b>Funding</b>	HOME: \$92,806
	<b>Description</b>	Administration of the HOME Program, including planning activities
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	low to moderate income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administration of the HOME Program, including planning activities. Individual activities limited to the 10% cap as described by HUD.

**AP-50 Geographic Distribution – 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The target area for entitlement funds is the entire city. A large percentage of the CDBG Down Payment Assistance Program will continue to be distributed in the Neighborhood Revitalization Strategy Area.

**Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Neighborhood Revitalization Strategy Target Area	4

**Table 58 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

These funds are a flexible tool that allows for programs that meet the goals of the Assessment of Fair Housing and Consolidated Plan through investments in both areas of opportunity and geographies that lack resources. Funds are being used to invest in strategic community development initiatives throughout the City of Mobile to provide low income residents with access to high opportunity areas and improve areas that need additional resources and investment.

**Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City plans to support the creation of new affordable housing units through new construction and/or rehabilitation utilizing HOME funds, in addition to improving existing single-family housing by rehabilitating the homes of low and moderate-income homeowners and doing rehabilitation of rental properties utilizing CDBG funds. HOME funds will also be used in our down payment assistance program to assist eligible buyers with the purchase of a home. The City will also utilize its ESG allocation for the support of those who are homeless or at risk of homelessness. The estimated 10 households supported through rental assistance include those households receiving homelessness prevention and rapid re-housing assistance, while the estimated 600 homeless households supported represent those individuals and households provided overnight shelter through an ESG-assisted homeless facility.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	600
Non-Homeless	60
Special-Needs	0
Total	660

**Table 59 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	2
The Production of New Units	1
Rehab of Existing Units	30
Acquisition of Existing Units	20
Total	53

**Table 60 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The goals listed above represent the City's plans for its 2018 allocations. The City currently has ongoing housing-related activities (utilizing prior years' resources) that will bring affordable units on-line throughout the 2018 program year.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Mobile continues to work with the Mobile Housing Board as they move forward to implement aspects of the Choice Neighborhood plans and identify funding sources for new housing.

### **Actions planned during the next year to address the needs to public housing**

The Mobile Housing Board is moving forward to implement aspects of the Choice Neighborhood plans. Roger Williams Homes, a 452-unit development, is currently being demolished through a combination of RAD funds and HUD's traditional Section 18 Demolition and Disposition program. This demolition is scheduled to be completed in May 2018. This same site was the subject of a Choice Neighborhoods Planning grant. Through the planning and interaction completed under the CNI planning grant, a number of units were identified to replace the public housing units that are being demolished on site.

The Mobile Housing Board partnered with a developer to submit a tax credit application in February 2018 for a 64-unit senior complex which, if approved, will be the first units to return to the site. The units will be a mix of approximately 42 RAD units and 22 Project Based Voucher (PBV) units.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Mobile Housing Board offers programs and services to assist families and provide opportunities to learn lifestyle and economic independence skills. The Community & Family Empowerment Department offers the Family Self-Sufficiency Program which focuses on economic independence. Additionally, Mobile Housing Board's Ross Service Coordinators Grant Program offers the Senior Wellness program. Both programs provide the following services and activities:

- Case management
- Transportation
- Wellness programs
- Employment opportunities
- Computer access

Career development programs are also offered and include GED tutoring, small business development workshops and the SWEET-P Summer jobs program which provides job training for residents 16-23.

The Neighborhood Development Department has been working closely with the Mobile Housing Board

to establish strategies to inform residents of the Down Payment Assistance program.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

With the support of the City of Mobile, the Mobile Housing Board is moving forward with plans to make capital improvements to create high-quality affordable housing and engage in holistic neighborhood revitalization efforts to improve access to opportunity and overall living conditions of residents.

**Discussion**

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Housing First has a number of plans that address outreach and assessment of the homeless, unsheltered. In late 2013, Housing First launched a full Community Outreach team, which was charged with providing assessment, referrals, and basic life case management services to those homeless unsheltered persons who live in Mobile City, Mobile County, and Baldwin County.

Further, Housing First has completed an action plan to fully implement the Coordinated Assessment process in the community. At this time, Phase 1 of this project has been developed and implemented. It tied the Community Outreach team and 15 Place as first points of contact for homeless individuals and provided an active phone and email referral system that allows community members and homeless individuals to easily access the outreach services that are needed anywhere in the community with ease. Further planned elements that are expected to be completed this year include the following: (1) inclusion of satellite kiosks at partner service centers to reach distant part of the region (this system will also include translation services to assess the needs of non-English speaking individuals), (2) embed an Outreach team at 2-1-1 to provide effective and timely response to those who access the system through that channel, (3) linkage of the 2-1-1 system to HMIS, and (4) refinement of a community-wide assessment tool that will be able to translate to each involved program.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Mobile funds service providers, provides direct services, and manages the Homeless Management Information System for the CoC. The Coordinated Entry staff are regularly on site at local food pantries and at meal service locations to engage new households and provide awareness of the coordinated entry system. A dedicated field Intake Specialist is tasked with outreaching to and serving street homeless individuals throughout the service area. They also regularly visit known encampments and other locations where individuals less likely to utilize formal supports may be found.

In addition to outreach conducted by the Coordinated Entry staff, the community has expanded efforts to broaden awareness of homelessness in the region. In partnership with City of Mobile, the CoC, service providers, private citizens, and businesses participated in a Homeless Summit to raise awareness, connect organizations and provide outreach resources. These efforts expand the network for individuals and organizations to seek assistance for homeless persons.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Mobile will continue to allocate funds to service providers to provide emergency and



transitional housing services to homeless persons through ESG funding.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City of Mobile will continue to allocate funds to service providers that provide shelter and services for women with children, families with children and women and children who have escaped domestic violence situations through ESG funding.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City of Mobile will continue to allocate funding to service providers that provide resources to individuals and families who may become homeless including workforce development programs, educational programs for youth, services for seniors, and legal services. In addition to funding through CDBG and ESG, the Continuum of Care has dedicated resources to provide services to ex-offenders and persons with disabilities.

## **Discussion**

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Community and Housing Development are working in tandem with the City's Build Mobile Department to put forth a modern and comprehensive code that remove barriers to affordable housing and encourage developments of all types throughout the city.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Mobile's Assessment of Fair Housing outlines strategies to address issues of fair housing, which directly impact access to affordable housing. The following is an overview of cross cutting strategies.

#### **Recommend revisions to zoning code to increase access to affordable housing**

The City is currently revising its land use plan and is scheduled to update its zoning code within the next year. Through this process the Community and Housing Development Department will recommend changes to enable the development of smaller housing units and multi-family properties, and incentivize the construction of affordable and supportive housing developments.

#### **Increase coordination with City Departments and City/Regional Entities**

Working with the Mobile Housing Board, school district and other agencies the Community and Housing Development Department will conduct an analysis of vacant or underutilized publicly owned properties that may be used for affordable housing and community development activities. In addition, the Department will develop a strategy for incorporating affordable housing into historic districts and other communities of opportunity. The City will actively participate in fair housing coordination with local and regional stakeholders and City/County agencies and departments.

#### **Provide more housing in areas of high opportunity and reduce barriers to affordable housing**

Stakeholder interviews identified the need for quality, affordable housing throughout the city. The City should preserve existing affordable housing developments in neighborhoods that are at risk of displacement or gentrification. In addition, the City should support and pursue affordable housing development in high opportunity areas.

#### **Reduce disparities in access to opportunities**

Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, the City will continue to target investments to increase resources east of I-65 and support the development of affordable housing west of I-65.

**Increase fair housing capacity**

The City of Mobile will expand awareness of fair housing needs and rights among stakeholder organizations and the community overall. This will include providing technical assistance and capacity building to area nonprofit organizations and the Center for Fair Housing to expand fair housing training and awareness.

**Discussion:**

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The Community and Housing Development Department is committed to strategically investing in blight remediation, affordable housing, and public services that will leverage existing and ongoing infrastructure investments throughout Mobile. CHD will continue to partner with other agencies, developers, local institutions, and service providers to leverage resources and encourage collaboration throughout the community.

### **Actions planned to address obstacles to meeting underserved needs**

The Community and Housing Development Department will continue to work with organizations and agencies to improve the delivery of public services and foster collaboration between organizations. Overall, there is limited funding for community and housing development throughout Mobile. As the City continues to invest in infrastructure, the Community and Housing Development Department will focus efforts on stabilizing neighborhoods and leveraging these major investments to provide housing and services to residents of Mobile.

### **Actions planned to foster and maintain affordable housing**

As part of the City's anticipated revision to the updated zoning code, the Community and Housing Development Department will prepare and present a recommendation to the Planning Department on strategies to increase access to affordable housing and eliminate land use barriers to affordable housing. The Department will prepare and present this recommendation to the Planning Department.

Complete land analysis to identify existing underutilized, city owned parcels that could be used to subsidize housing and community development activities by December 2018

Support at least 1 tax credit application per year from 2018 to 2022 in the City of Mobile

### **Actions planned to reduce lead-based paint hazards**

The City of Mobile is working to address blight and rehabilitate housing in areas of the city with older housing stock, including the CDBG target areas. When undertaking demolition and rehabilitation activities, projects are managed by contractors and non-profit staff that are certified in lead safe work practices.

### **Actions planned to reduce the number of poverty-level families**

In addition to providing opportunities for residents to live in high-quality affordable housing, Community and Housing Development will support an increase workforce development and job training opportunities that are accessible to all residents.

### **Actions planned to develop institutional structure**

Community and Housing Development will continue to provide guidance and assistance to ensure grantees are complying with funding requirements.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Conduct training for all public service providers annually from 2018 – 2022 to ensure awareness of all existing housing programs managed by the City

Participate in fair housing month from 2018 – 2022; conducting at least 3 events and/or campaigns related to fair housing targeted to different resident groups

Participate in community development week from 2018 – 2022; conducting at least 2 events and/or campaigns related to community development

Facilitate working group (beginning June 2018) with local employers, Bishop State and Wave transit to establish a strategy to increase the offerings of job training programs and work to ensure public

### **Discussion:**

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements – 91.220(I)(1,2,4)**

#### **Introduction:**

The City of Mobile will comply with all program specific requirements including using the HUD provided HOME affordable homeownership limits for newly constructed housing and for existing housing. All HOME funds are administered by the City of Mobile.

The City of Mobile advertises CDBG and HOME funded programs by issuing press releases, publishing ads in the paper, and engages in community outreach activities. Flyers are made available at the Community Housing and Development Department and are left at properties cited by Municipal Enforcement for code enforcement violations. Additionally, the City provides information to local developers by issuing RFPs that announce available funding and publishes applications online. Applications for individual assistance are available in the Community Housing and Development Department.

The City will be using a Float Loan Program which has a projected estimated capacity of \$1,000,000 using CDBG funds. These Float Loans will be for eligible activities as described in the Project Section of the Action Plan. The most probable use of Float Funds will be for construction financing. Float Loans will have terms ranging from 12-30 months at a rate of 0-3%. All Float Loans will require a letter of credit from a financial lending institution in order to alleviate risk.

Eligible homebuyer applicants are any person or household that is of low/mod income. For homebuyer and rehabilitation assistance, applicants will be served on a first-come basis based on need of funds until funding is exhausted. The down payment assistance applicants are typically referred by a lending institution to make up a gap in financing based on their underwriting criteria.

Eligible multi-family applicants are any entity or individual that meets the HOME criteria for having sufficient experience and will provide the needed mix of varying income level units as required by the HOME program. Developer assistance proposals will be accepted on a rolling basis and will be taken into consideration based on current City needs, leveraging of funds, and the need of housing in the proposed area. There will be no limits or preferences given to different segments of the low/mod population for any type of activity beyond those required for HOME multi-family activities. Police officers and firemen/firewomen can qualify for a higher amount of assistance if they qualify.

The City of Mobile uses HOME affordable homeownership limits for the area as provided by HUD when HOME funds are being used for homebuyer assistance or the rehabilitation of owner-occupied single family housing. In the case that HOME affordable homeownership limits for the area are not used, it will

determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 92.254(a)(2)(iii).

Detailed information on the City's selection process and underwriting criteria is available at 205 Government St.; South Tower-Suite 508; Mobile, AL 36602.

**Community Development Block Grant Program (CDBG)  
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	175,551
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	1,000,000
<b>Total Program Income:</b>	<b>1,175,551</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Mobile does not intend to utilize other forms of investment beyond those identified in Section 92.205.



2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Mobile utilizes HOME funds for assisting homebuyers through down payment assistance, new construction, and rehabilitation. For those activities, the City will utilize recapture provisions in accordance with 24 CFR 92.254(a)(5)(ii)(A)(2) which provides for the option of a prorated reduction of HOME investment amount to be recaptured during the affordability period.

HOME funds will be provided and administered by the City as a direct subsidy to the eligible household in the form of a deferred, forgivable loan. There will be no payments required during the term of the loan. A mortgage and promissory note will be executed and recorded to secure the City's lien on the property and to outline the recapture provisions. The City will allow this mortgage to be in a subordinate position. The affordability period and associated recapture provisions will be based on the following levels of assistance: a) 5 years for \$1,000 - \$14,999, b) 10 years for \$15,000 - \$40,000, and c) 15 years for over \$40,000.

For each full year the homeowner continues to own and occupy the property as their primary residence, the applicable percentage of the original loan amount will be forgiven at the anniversary date of the signing of the mortgage and note. If the homeowner retains ownership and occupies the property as their primary residence for the full affordability period, the entire amount of the loan shall be considered forgiven. The mortgage will then be cancelled and released in the records of the Probate Court.

If, during the affordability period, the homeowner sells the property, transfers title, or ceases to occupy the property as their primary residence, they will be required to repay the City that portion of their loan which has not been forgiven. HOME-assisted homebuyer to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. For example, if the homeowner was given an initial loan of \$20,000 (to be forgiven over 10 years), and the homeowner sold the property after four years, the City would recapture \$12,000 which represents 60% of the original loan amount.

In the event of a sale during the affordability period (whether voluntary or involuntary), the amount subject to recapture is limited to the net proceeds after the first mortgage (if applicable) is repaid.

For homebuyer activities, the City ensures that there will always be a direct subsidy to the homebuyer.

The following language is included in the Second Mortgage Document:

“BUT THIS CONVEYANCE AND THE COVENANTS HEREIN CONTAINED ARE UPON THE EXPRESS CONDITION: That if Mortgagor shall perform all covenants and agreements herein contained and if Mortgagor shall continue to own and occupy the purchased home as Mortgagor's primary residence, conveys no interest therein by deed, mortgage or otherwise, then, for each full year

Mortgagor continues to own and occupy the purchased home as Mortgagor's primary residence then, twenty (20%) percent of the original principal sum hereunder shall be forgiven at the anniversary date of the signing of the promissory note to which this Mortgage is subject, along with any interest due and owing at that time, and said amount shall be deemed paid. If Mortgagor retains ownership and occupies the Purchased Home as Mortgagor's primary residence five (5) or more years, the entire amount of the debt and any interest due hereunder shall be forgiven and the debt shall be deemed paid in full and the debt shall be considered discharged, and the mortgage shall be cancelled in the records of the Probate Court of Mobile County, Alabama."

Should the borrower default and that default not be repairable, the City would recapture any remaining HOME funding based on the mortgage.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

In addition to the recapture provisions described above for single family homes assisted with HOME funds (through acquisition, rehabilitation, or new construction), the City ensures affordability compliance on its HOME-assisted multifamily units as well. These affordability provisions are contained in the City's HOME Loan Agreement and Mortgage. Borrowers also execute a Declaration of Land Use Restrictive Covenants that ensures that the HOME Program rent and income restrictions will remain in place on the property throughout the affordability period, even if the property is sold to another owner and/or the HOME loan is paid off.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

**Emergency Solutions Grant (ESG)**  
**Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The ESG subrecipient agency must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under Section 576.400(d) and the written standards established under Section 576.400(e).

In accordance with the statute, as an initial evaluation for homelessness prevention assistance, an individual or family must meet two threshold criteria and must exhibit one or more specified risk factors. The individual or family must have a household income at or below 30% of the area median income, and they must have insufficient resources immediately available to attain housing stability. These "at risk" factors are further identified as follows: (1) has moved frequently due to economic reasons, (2) is living in the home of another because of economic hardship, (3) has been notified that their right to occupy their current housing or living situation will be terminated, (4) lives in a hotel or motel, (5) lives in severely overcrowded housing, (6) is exiting an institution, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that (1) The program participant does not have an annual income that exceeds 30% of the area median income (as determined by HUD) and (2) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

When the program participant's income or other circumstances change (e.g. changes in household composition) that affect the program participant's need for assistance under ESG, the subrecipient must re-evaluate the program participant's eligibility along with the amount and types of assistance the program participant needs. When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609. Finally, subrecipients must assist each program participant, as needed, to obtain appropriate support services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordination to assist the homeless and prevent homelessness will be led by the CoC. Active engagement and membership in the CoC is required to receive funding. The CoC will further engage and coordinate resources to improve current programs and funding strategies, and will provide ongoing training in partnership with the City's Community and Housing Development Department as procedures are refined.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

For the 2018 Program Year, the City announced an open, competitive application process in November 2017, with applications being due in December 2017. These applications were scored separately by three reviewers from the Community and Housing Development Department who utilized a scoring matrix that awarded points based on: Community Need, Program Description and Effectiveness, Agency Management, and Past Performance. Funding recommendations were based on those scores while also staying within the limitation that no more than 60% of our ESG allocation could go to the combined activities of Street Outreach and Emergency Shelter.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

As a condition of their award funding, the City requires ESG subrecipients to have a homeless person or formerly homeless person involved in a policy-making capacity or in the operations of their programs to satisfy the ESG homeless participation requirement. There are also such representatives on the CoC Board of Directors.

5. Describe performance standards for evaluating ESG.

The following performance standards will be used to evaluate ESG activities:

- Unduplicated number of persons or households prevented from becoming homeless
- Unduplicated number of persons or households assisted from emergency shelters (or living on the street) into permanent housing
- Lowering the recurrence of periods of homelessness for individuals and households assisted with ESG funds

Improving the financial stability of those individuals and households assisted with ESG funds



## Attachments

## Citizen Participation Comments



June 28, 2018

**Re:** Summary of comments received on PY 2018-2022 Consolidated Plan and PY 2018 One-Year Action Plan

There were two formal published comment periods, each of which included a public hearing, during the City of Mobile's PY 2018-2022 Consolidated Plan and PY 2018 One-Year Action Plan Process. During both public hearing, there were only questions pertaining to potential developments, how to participate in housing programs, and questions about the sub-recipient application. The City received one written comment from Restore Mobile during the first comment period. The comment was neither accepted nor rejected because it was requesting that the City fund Restore Mobile as a developer when funding becomes available. The City will continue to review all developer applications as they are submitted to select the best project for both the City and its citizens. Their comment is attached.

During the development of the PY 2018-2022 Consolidated Plan and PY 2018 One-Year Action Plan, the City consulted with the general public, specific service providers, quasi-governmental agencies, and neighboring jurisdictions. The City consulted these groups through numerous outreach mechanisms including surveys, interviews, stakeholder meetings, and technical assistance meetings. A summary of these consultations are attached.

A handwritten signature in blue ink, appearing to read 'James Roberts'.

James Roberts  
Senior Director  
Neighborhood Development

## **Appendix A – Summary of Citizen Participation Activities and Comments**

### **AFH Community Participation Process**

The Housing and Community Development Department is using the Affirmatively Furthering Fair Housing process to reaffirm its commitment to community engagement and outreach throughout its program activities. Over the past year, the Department experienced staff and leadership transitions, and the outreach completed to date for the AFH will serve as the basis for moving forward to incorporate engagement and outreach into its housing and community development activities. The community participation process consisted of a number of strategies to engage a range of community stakeholders and residents. The City of Mobile marketed the AFH public meetings through its network of stakeholders, including nonprofit organizations serving persons with disabilities and residents within R/ECAPs. Additionally, the Mobile Housing Board marketed the meetings to their residents and the Mobile Housing Board's Resident Advisory Board. In conjunction with community organizations and stakeholders, the City widely distributed a survey in both English and Spanish, a summary of the survey results are found below. The public meetings have been advertised through the City of Mobile's website, distribution of fliers, and through newspaper announcements. The City of Mobile continued its community participation process through hosting two additional public meetings during the month of July, following up with community stakeholders and soliciting feedback on the public comment draft of the document.

#### **Stakeholder Interviews:**

A series of stakeholder interviews were conducted with 18 organizations and 35 individuals representing organizations who are active in housing, community development, fair housing and public service activities in Mobile and the region. These interviews were held in person and via phone from May 25, 2017 through June 29, 2017. Stakeholders were identified by the City of Mobile and invited to participate in one-on-one interviews. Interviews that could not be conducted in person were conducted over the phone.

Interviews were held at each stakeholder's office for approximately one hour. The goal of each interview was to go beyond the quantitative data to gain perspective on the community development challenges and impediments to fair housing from an array of non-profit developers and service providers. To begin, stakeholders were asked about Mobile's community assets, challenges, and needs across the City. Stakeholders were asked to comment on impediments identified in the Analysis of Impediments submitted in 2012 to identify impediments that still exist and actions the city could potentially take to address impediments moving forward.

In addition to interviews, a stakeholder meeting was conducted with a group from the Mobile Housing Board's Resident Advisory Board on June 13, 2017. With the assistance of leadership at the Mobile Housing Board, the AFH team met with 13 resident leaders from 9 housing developments at the Renaissance Community Center at 600 Joachim Street in Orange Grove Homes. The residents identified challenges and concerns from the quality of Mobile Housing Board units to access to education. The Advisory Board's comments were very similar to other stakeholder comments and are included in the summary in Section III.4. of the document.

#### **Community and Public Meetings:**



One public meeting was held during preparation of the AFH and the City will hold two additional public meetings during the comment period for residents and stakeholders

**June 19, 2017** – A community meeting to solicit input on the City of Mobile’s existing fair housing efforts and recommendations on actions to continue to affirmatively further fair housing. The meeting was held at 6:00pm in the Ben May Main Library, an ADA-accessible public building located at 701 Government Street, Mobile, Alabama, 36602. Ben May Main Library is centrally located near a number of publicly supported housing developments and R/ECAPs. The meeting was advertised on June 7, 2017 in the Mobile Register, posted on the City of Mobile’s website and on event boards throughout City Hall. Additionally, flyers were distributed to local stakeholders, including the Mobile Housing Board. Flyers were posted at each public housing development and sent to every management office. The flyer was also sent to all of the resident leaders and staff at the Mobile Housing Board.

**July 13th, 2017** - A community meeting was held to review the Draft AFFH Plan and goals in the Multi-Purpose Room in Government Plaza at 10:00am. The meeting was advertised on June 30<sup>th</sup>, 2017 in the Mobile Register, posted on the City of Mobile’s website and on event boards throughout City Hall. The City of Mobile’s nonprofit grantees and other community stakeholders are invited to review and provide comments on the draft AFH document. Flyers were posted at each public housing development and sent to every management office. The flyer was sent to all of the resident leaders and staff at the Mobile Housing Board.

**July 27, 2017** – A community meeting was held to review the final AFH plan and goals. The meeting was held at 6:00pm at the Ben May Main Library, an ADA-accessible public building located at 701 Government Street, Mobile, Alabama, 36602. Ben May Main Library is centrally located near a number of publicly supported housing developments and R/ECAPs. The meeting was advertised on June 30<sup>th</sup>, 2017 in the Mobile Register, posted on the City of Mobile’s website and on event boards throughout City Hall. Flyers were posted at each public housing development and sent to every management office. The flyer was also sent to all of the resident leaders and staff at the Mobile Housing Board.

**Mobile Resident Consolidated Plan Survey – Community Needs Assessment:**

A survey was created and distributed to stakeholders and community members that were either unable to attend the scheduled community meeting or to provide another method of feedback. The survey was available online and paper copies were printed and available for community members that did not have computer access or preferred to complete the survey on paper. Additionally, a Spanish language version was distributed by the Providence/Outreach Guadalupe Center and made available at the Community meeting on June 19, 2017. The survey was conducted from June 13, 2017 through June 27, 2017 and received a total of 233 responses. The City of Mobile distributed the survey via email through City of Mobile lists from previous planning processes, to the City of Mobile’s Comprehensive Plan stakeholder list, and to the Mobile Housing Board. In addition to the efforts of the City, the survey was sent to local stakeholders to forward to their distribution networks. Survey questions and design are included below.

**Respondent Profile**

- A clear majority (>80%) of respondents reside in the City of Mobile
- While a similar majority of respondents work in the city and participate in Mobile-centric leisure activities, only 20% have children in Mobile public schools.

**Figure 1 Survey Respondent Location**

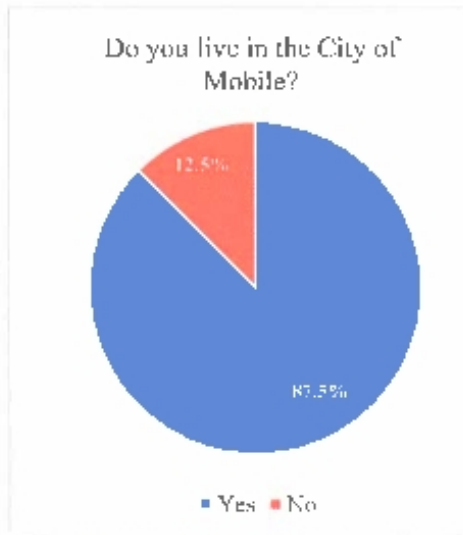
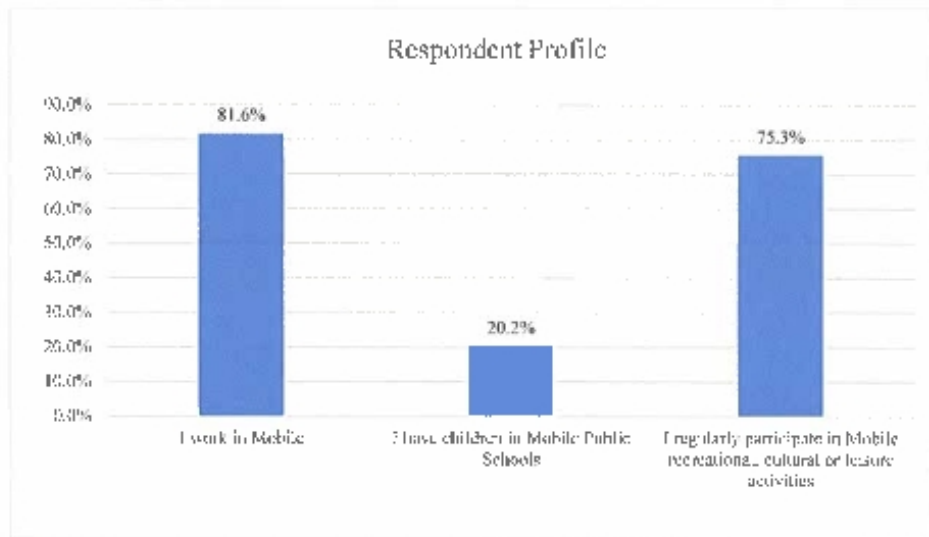


Figure 2 Survey Respondent Profile

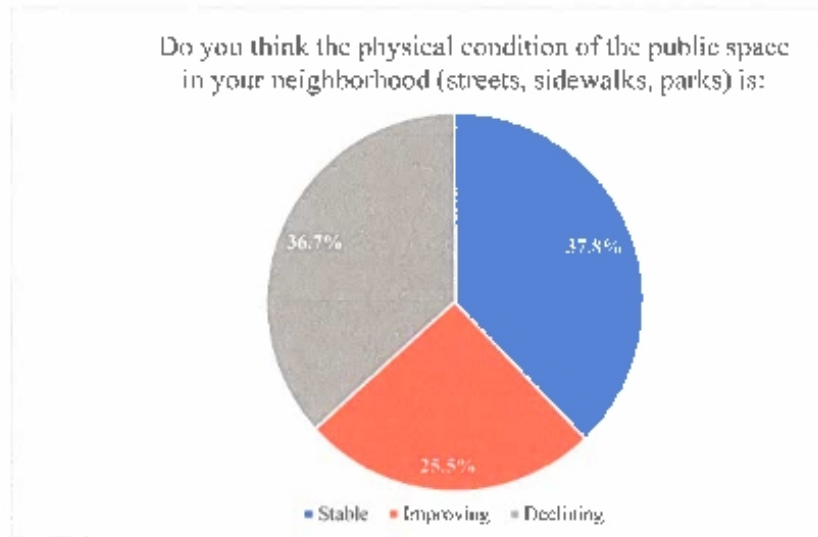


Community Conditions

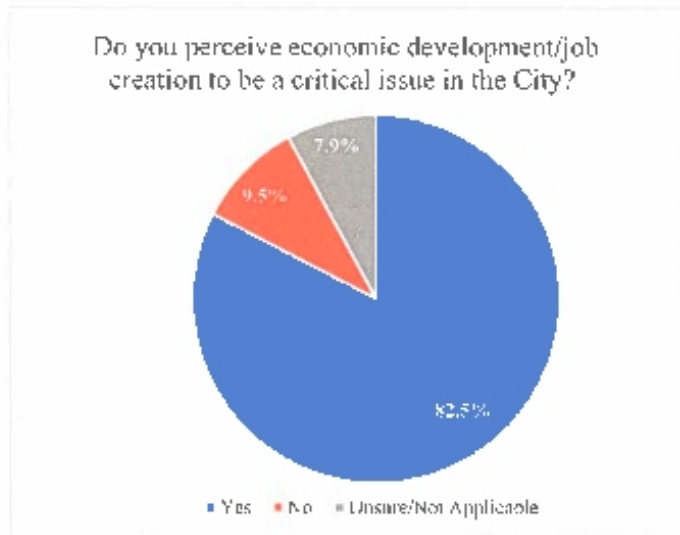
- Respondents are evenly divided on whether public space infrastructure is improving or maintaining its current level. Fewer feel it is improving.
- Similar opinions were expressed concerning condition of housing in respondent's neighborhoods.

- A clear majority (83%) feel that economic development and job creation are critical issues for Mobile.
- A slightly higher majority (86%) believe that abandoned and foreclosed housing is a critical issue for the city.
- 28% of respondents feel unsafe in their immediate neighborhood.

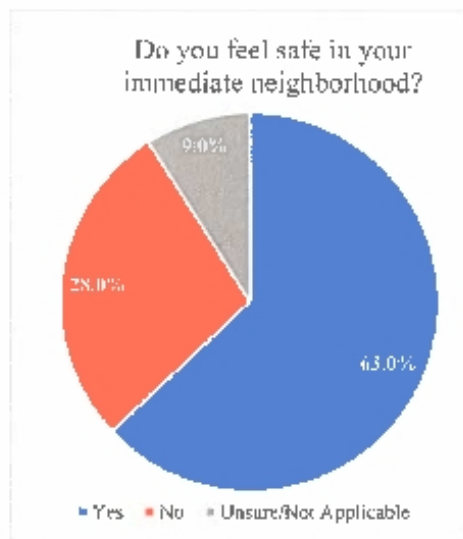
**Figure 3 Survey Neighborhood Condition Responses**



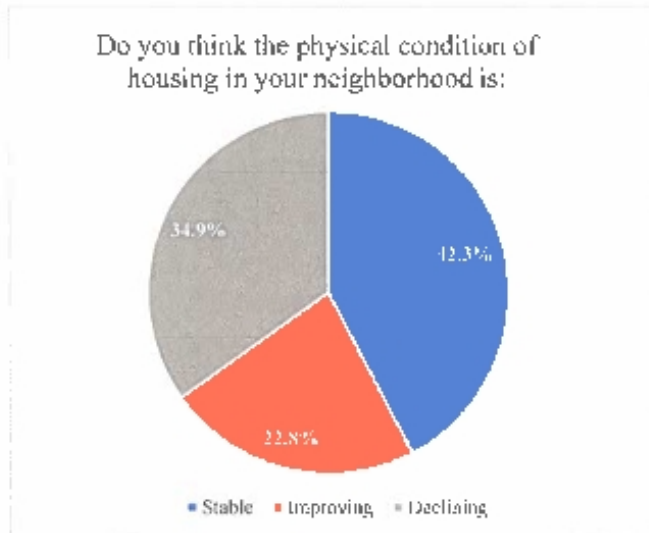
**Figure 4 Survey Economic Conditions Responses**



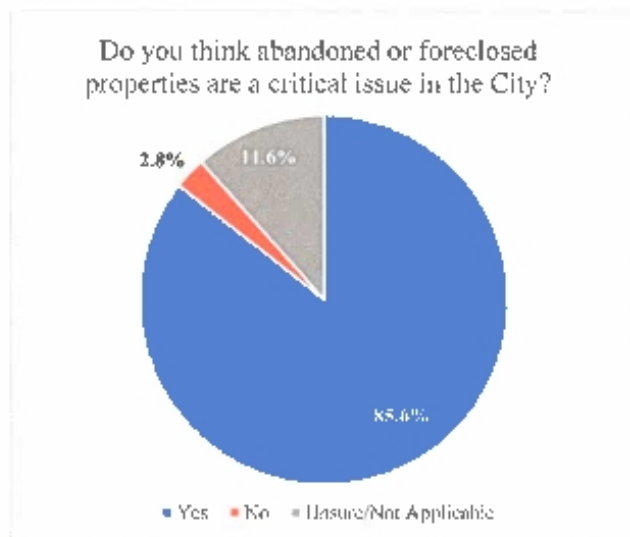
**Figure 5 Survey Safety Responses**



**Figure 6 Survey Housing Condition Responses**



**Figure 7 Abandoned Properties Survey Responses**



**Community Services**

- More than half of respondents found that the city is in "high need" of every type of public service in the list provided. The only exception was homebuyer education, which only 48% of respondents thought the city had high need.

- The vast majority of respondents found that the City has a “high need” housing, community services, community facilities, economic development and infrastructure.

**Table 1 Community Development Needs Survey Responses**

Please rank the level of need for the following types of Community Development in the City			
Community Development Activities	Low Need	Moderate Need	High Need
Safe and Affordable Housing	2%	14%	83%
Community/Neighborhood Services	4%	32%	63%
Community/Neighborhood Facilities	4%	36%	59%
Economic Development	2%	20%	77%
Infrastructure (Streets, Sidewalks, Parks)	4%	22%	73%

**Table 2 Public Service Needs Survey Responses**

Please rank the level of need for the following types of Public Services in the City:				
Public Service Activities	Low Need	Moderate Need	High Need	Unsure/Not Applicable
Youth Services/Child Care	2%	25%	67%	6%
Senior Services	3%	38%	54%	4%
Job Training/Readiness Programs	1%	20%	76%	2%
Health/Behavioral Health Services	3%	17%	78%	2%
Homebuyer Education/Financial Literacy	8%	40%	48%	4%
Fair Housing	3%	30%	64%	2%
Services for Persons with Disabilities	0%	32%	64%	3%
Homeless Services	2%	20%	76%	1%
Domestic Violence Services	2%	25%	67%	6%
Legal Services	8%	36%	53%	4%

**Disability and Access**

- A majority of respondents who have or a family member has a disability agreed or strongly agreed that they or a family member with a disability cannot navigate the neighborhood in an acceptable way due to inadequate sidewalk or lighting conditions.
- 23% of respondents agreed or strongly agreed that they cannot afford housing that has handicapped or accessibility features.
- No respondent indicated that a landlord refused to accept a service animal on the premises.
- 12% agreed or strongly agreed that a landlord refused to make an accommodation for a tenant's disability.

**Table 3 Disability and Access Survey Responses**

Please rate your level of agreement with the following statements:

Disability Analysis	Strongly Disagree	Disagree	Agree	Strongly Agree	N/A	Response Count
Either a household member or I have a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting.	3	13	16	13	6	51
I can't afford a housing unit that has accessibility/handicapped features (e.g. grab bars, ramps, handicapped parking).	4	16	6	5	18	49
My landlord refused to accept a service animal.	6	13	0	0	29	48
My landlord refused to make an accommodation for me or my household member's disability.	6	10	4	3	26	49

**Fair Housing**

- When asked about barriers to moving to another part of Mobile, 45% of respondents indicated they did not want to move. 23% indicated that they could move if they wanted to.
- 21% cited their inability to move due to unaffordability of other neighborhoods; 17% cited moving costs.
- 6% cited discrimination as a barrier to moving; 4% cited their race/ethnicity.
- When asked what actions they had taken if they had felt discriminated against, a majority (65%) did nothing, while 15% said they contacted a fair housing organization.

**Table 4 Fair Housing Barriers Survey Responses**

What barriers, if any, keep you from living in another part of Mobile (check all that apply)?		
Barriers to Housing	Response Percent	Response Count
I don't want to live in another part of Mobile	45.1%	87
There are no barriers, if I wanted to move, I could	23.8%	46
Can't afford to live anywhere else	21.2%	41
Can't afford moving expenses	17.1%	33
Access to public transit	5.2%	10
My race/ethnicity	3.6%	7
My family status	4.7%	9
Discrimination	6.2%	12
Felony/criminal record	0.5%	1
No accessibility/handicapped accessible housing elsewhere	2.1%	4
Other (please specify)	7.8%	15

**Table 5 Fair Housing Discrimination Survey Responses**

If you felt you were discriminated against, what did you do about the discrimination (check all that apply)?		
Responses to Discrimination	Response Percent	Response Count
Called/emailed Fair Housing organization	14.6%	6
Called/emailed other organization	2.4%	1
Called/emailed Housing Authority	7.3%	3
Called/emailed government agency	2.4%	1
Called/emailed a lawyer	7.3%	3
Nothing	65.9%	27
Other	12.2%	5

**Stakeholder Consultation**



Throughout the process, a number of organizations were consulted to provide qualitative and quantitative data for the Assessment of Fair Housing. These organizations represent a cross section of organizations working directly on various aspects of community development and provide different perspectives on fair housing issues in Mobile. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing in the community.

- Bishop State Community College
- Center for Fair Housing
- City of Mobile – Advisory Commission on Disabled
- Community Foundation of South Alabama
- Habitat for Humanity of Southwest Alabama
- Housing First Inc.
- Independent Living Center of Mobile Arc (MARC)
- Mobile Area Association of Realtors (MAAR)
- Mobile-Baldwin Continuum of Care
- Mobile County Alabama
- Mobile Housing Board
- Mobile Housing Board Resident Advisory Board
- Sybil H. Smith Family Village (Dumas Wesley Community Center)
- United Methodist Inner City Mission
- United Way of Southwest Alabama
- Volunteers of America
- Wave Transit System

#### **Community Participation**

The City of Mobile's efforts to engage community in the AFFH process have resulted in meaningful community feedback on the fair housing issues facing City residents. The City of Mobile's Housing and Community Development Department office has experienced significant staff turnover since the previous Analysis of Impediments to Fair Housing. The new Department staff is working to establish or reestablish connections with key nonprofit and fair housing organizations, sub recipients, and service providers. The AFFH process has allowed the staff to make headway in reestablishing these connections. As the City is assuming management of HUD CPD funds that have historically resided within the Mobile Housing Board's Authority, they are working to build partnerships with community organizations and nonprofits through the AFFH process, a Housing Plan (to be developed in late summer/fall 2017), and the Consolidated Planning Process. While the community and stakeholder engagement is an ongoing process for City staff, to date 18 organizations have been interviewed, and 233 people have responded to the City's AFFH survey.

### **Stakeholder Interviews**

Stakeholder interviews focused on identifying Mobile's community development assets, challenges, needs, current impediments to fair housing and potential actions to address impediments. The following provides a summary of these comments and the most common answers.

#### ***Community Assets***

According to stakeholders, Mobile has an array of both social and physical assets. Nearly every respondent commented on the strength of local leadership and dedicated community members. Many noted the importance of strong working relationships and the willingness of community leaders to work together to tackle big community development issues. Additionally, many respondents had an optimistic view of the Mayor's Office and their approach to governing.

The success of local economic development efforts to attract new jobs was also a common answer among respondents. Overall, there was a level of optimism surrounding the ability to attract companies such as Airbus, Walmart, and Amazon.

Stakeholders also identified various physical attributes that are considered assets to the community. The prevalence of water in the region for recreation, industry, and as a natural resource came up again and again in interviews. This includes Mobile's port and other infrastructure such as Interstate 10 that provide Mobile with the transportation infrastructure to attract and retain businesses. In addition to the active physical assets, stakeholders identified blighted properties and vacant lots as an asset for redevelopment activities.

#### ***Community Challenges***

While stakeholders identified the leadership of the community development committee as an asset, many felt that bringing leaders together from various organizations was a challenge. Many felt there could be additional opportunities to bring people together to coordinate services and create an effective network of service providers to make greater change and serve residents. A number of stakeholders identified this as especially necessary in the face of declining resources at a federal and local level.

One of the major challenges identified during stakeholder interviews was the disparities in access to opportunity for a large percentage of residents. These disparities were linked to long standing patterns of segregation in the community. Communities of color and residents living in poverty have limited access to affordable housing, transportation, and living wage jobs. Additionally, due to the development patterns throughout Mobile, a number of organizations that provide services to individuals seeking housing, transportation, and education/job skills are located outside of neighborhoods with the most need. The Public School System was also identified as a challenge, with many stakeholders noting the bad reputation of several schools and prevalence of parochial and private schools in the area.

In addition to the lack of direct funding, affordable housing developers identified challenges in accessing sustainable financing, market challenges, and restrictive zoning policies. Community opposition to development was another challenge affordable housing developers consistently face across the city.

Stakeholders identified aging and inadequate infrastructure as a challenge for Mobile. Outside of basic infrastructure maintenance and improvements for sewer, roads, and parks, there is also a need for additional regional transportation infrastructure. The need for a bridge over the Mobile River came up during numerous interviews.

#### ***Community Needs***

Every stakeholder identified affordable housing as a community need. Specifically, there is a need for supportive housing to serve populations that are suffering from addiction and mental illness. Another major need in the community is housing for those returning from prison or jail. Publicly sponsored housing is not an option for many returning from jail or prison under existing policies. There is also a need for emergency housing, as publicly supported housing has rules, regulations, and a wait list that prevent households from being able to access housing quickly.

In addition to affordable units, there is a greater need for critical repair programs and funding. These funds support households that own their homes and need assistance with major repairs or modifications, decreasing blight and allowing residents to stay in their homes.

In addition to affordable housing, stakeholders overwhelmingly commented on the need for expanded transit service. Many noted that current routes made it difficult, if not impossible to use transit to get to and from work and access services.

Beyond housing, many stakeholders felt Mobile needs additional mental health and addiction services. One stakeholder in particular mentioned that the community is still struggling to identify the severity of the problem and there is a dire need for additional access to treatment, medication, and corresponding services.

Stakeholders also identified the need for programs and activities to engage youth, a community based police force and environmental protection for all Mobileans.

#### *Current Impediments to Fair Housing*

Stakeholders identified a number of real estate and housing market impediments that currently exist in Mobile. Overall, there is a lack of affordable options for those living in poverty, the elderly, and disabled. This is demonstrated by waiting lists for publicly funded housing units and housing units for the homeless. In addition to those on waiting lists who meet programmatic requirements, there are individuals who do not meet these requirements (including those who have been incarcerated) and have very limited access to quality affordable housing.

Interviews also provided insight into the challenges to educate and inform the community about fair housing. Overall, there is a lack of awareness surrounding fair housing and the resources and services provided by the Center for Fair Housing. Marketing and outreach efforts have declined as funding has decreased and been primarily focused on training, program delivery and less on outreach and engagement. Additionally, stakeholders identified that training sessions for local organizations could be more focused to draw more participants.

The majority of stakeholders identified that cuts to public transit services continue to impede mobility and access to public transit.

The lack of financial education and training in the community is still present according to stakeholders. Lack of access to financial services continues to be a problem and some stakeholders felt that redlining still existed in the community.

Stakeholders identified that blight continues to be a problem in certain neighborhoods, impeding access to safe and healthy neighborhoods. Neighborhoods that are being impacted by blight continue to face barriers in accessing basic amenities such as grocery stores.

A theme that repeatedly arose in interviews was the continued need for additional job training and educational programs to prepare and connect low to moderate income individuals to available jobs in the region.

Stakeholders acknowledged the efforts of the City to improve infrastructure across the city. These improvements include making sidewalks more accessible and improving access to all individuals, including the disabled.

#### ***Potential Actions to Address Impediments***

In each interview, participants were asked to describe potential fair housing goals and the action items that could be implemented to address them.

The need for greater cooperation among stakeholders was a common theme throughout the interviews. Many suggested bringing stakeholders together to both acknowledge the important role local service providers play in the community, as well as create and implement strategies to address community development issues citywide.

Housing developers suggested strategies and policies that promote affordable housing development and simplify the process. Stakeholders would like to see strategies that encourage developers and funders to become more efficient, such as incentives to develop at scale, ensure timely payments, and ease city fees and requirements. Strategies to address neighborhood conditions and access to opportunity, such as targeted demolition, development subsidies in high needs neighborhoods, and development near transit, were suggested by stakeholders as well.

The City of Mobile and the Mobile Housing Board should also work together to keep redevelopment efforts on track at Mobile Housing Board properties and increase the number of affordable housing units through the Choice Neighborhoods program.

Fair Housing and homebuyer education services can be improved through additional engagement and cooperation to provide both residents and developers with the education they need to further fair housing in Mobile.

Stakeholders also agreed on the need to identify funding sources and strategies to improve transit across the city and increase access to jobs and services.

As Mobile continues to attract new companies and jobs, stakeholders support existing educational and job training efforts and would like to see more opportunities for all of Mobile's residents to participate in the local job market.

#### **Community Meeting – June 22, 2017**

The City of Mobile hosted a community meeting to provide residents with an overview of the Assessment of Fair Housing process, initial findings, and current initiatives. The community was also asked to provide feedback on the initial data analysis and ask questions. Below is a summary of questions and comments provided by community members:

**Question:** How is this tied into the Choice Neighborhoods planning efforts and MAP for Mobile planning efforts?

**Answer:** The Assessment of Fair Housing includes an analysis and coordination with all housing and community development planning activities currently taking place in Mobile.

**Question:** Are there any public housing developments (Mobile Housing Board) receiving tax credits?

**Answer:** Mobile Housing Board (MHB) has two (2) tax credit properties – Downtown Renaissance and The Renaissance Family housing developments. The Mobile Housing Board (MHB) received an allocation from the Alabama Housing Finance Agency in the 2016 cycle of Low Income Housing Tax Credit (LIHTC) allocations. It is part of their Rental Assistance Demonstration (RAD) conversion application to the Department of Housing and Urban Development (HUD) and is just outside the City limits, west of I-65.

**Question:** Is there a review of the WAVE transit plan from 2015?

**Answer:** Yes, as part of the AFH document, the City has reviewed a range of existing community development and housing strategies and plans (see Figure 10).

**Question:** I work with a lot of clients who are looking for work – are there training programs?

**Answer:** The City is currently working with local employers, community colleges and service providers to enhance and increase the availability of job training programs.

**Question:** Bishop State is currently working on programs and adjusting class scheduled to meet the training needs of residents in the region. There are not a lot of night classes – looking to change that to attract more students.

**Answer:** The City is supporting this effort and collaborating with Bishop State to achieve this effort.

**Question:** What is the status of the vacant Mobile Housing Board Developments?

**Answer:** The HUD Office of Inspector General issued a finding that the Mobile Housing Board (MHB) produce an overall organizational plan for HUD to review and track progress. The MHB plan is currently under development and will include a plan for vacant MHB properties. The MHB is also currently finalizing the hiring of a new Executive Director.

#### **Community Meeting – July 13, 2017**

The City of Mobile hosted a community meeting at Government Plaza to provide an overview of the Assessment of Fair Housing document and specifically fair housing goals and strategies. Below is a summary of questions and comments provided by community members:

**Question:** Where can the draft of the plan be reviewed?

**Answer:** Mr. Roberts stated that the draft is available for review in the Community & Housing Development Department, Monday-Friday 8:00am to 5:00pm. Also, a copy of the draft can be emailed by request. He also stated that the draft is also available on the City's website, [www.cityofmobile.org](http://www.cityofmobile.org).

**Question:** How can the public submit comments?

**Answer:** Mr. Roberts stated that comments must be submitted in writing to Community and Housing Development.

**Question:** How can a Commission of Fair Housing be developed?

**Answer:** Mr. Roberts stated that the City can only address limited issues with HUD funding. Mr. Roberts stated that state and county funding addresses transportation and education issues.

**Question:** Are the Hispanic and Asian populations included in community engagement and outreach?

**Answer:** Mr. Roberts stated that the consultants, GCR Inc., contacted about 40-50 groups, some of whom were Hispanic and Asian. Information regarding the plan and community meetings was advertised, including the survey, in English and Spanish.

**Question:** Are the housing programs available to county or city only?

**Answer:** Mrs. Hansberry stated that all housing programs are currently only offered to residents within the city limits of Mobile.

**Question:** How does Community and Housing Development advertise programs?

**Answer:** Mr. Roberts stated that all programs are advertised on the City of Mobile's website, the local newspaper- The Mobile Press Register, and many nonprofit organizations receive information to pass along to citizens they serve.

**Question:** How are grocery stores and amenities that citizens need, along with transportation to access these amenities being address?

**Answer:** Mr. Roberts stated that the new Publix grocery store on Old Shell Rd will address a lot of those issues due to it being located in Midtown, a central location.

**Question:** How are segregation issues being address within the City?

**Answer:** Mr. Roberts stated that a survey was conducted and a large percent of respondents indicated that they did not want to move from their existing location. Ms. Reed indicated that this response is based solely on the surveys that were completed; which is why citizens are strongly encouraged to attend the community meetings and public hearings.

**Question:** How broad is the survey getting distributed?

**Answer:** Mr. Roberts stated that the survey is being distributed through every available channel, such as, the City of Mobile's website, the local newspaper, through many non-profit organizations, and social media.

**Question:** Were any paper copies of the survey distributed?

**Answer:** Mr. Roberts stated that the surveys were electronic, but if a citizen preferred to print it out and submit it to the City, they were also accepted.

**Question:** Were small minority businesses distributed a survey?

**Answer:** Mr. Roberts indicated that Archnique Kidd with the City of Mobile Procurement Department was given a paper copy of the survey to pass along to minority business owners.

**Question:** Are the results of the survey and how it was distributed available for review by the public?

**Answer:** Mr. Roberts indicated that the results of the survey are in the actual plan and is available for review by the public. A copy of the plan is located in the Community and Housing Development Department and also on the City of Mobile's website under the announcements tab.

**Question:** Are future generations, such as the younger citizens, contacted regarding housing and community needs rather than established citizens?

**Answer:** Mr. Roberts indicated that the information was captured on the survey. Christopher McGadney, Program Analyst with Community and Housing Development stated that the survey was distributed to the local colleges and universities within the City but did not receive very many completed surveys from the younger citizens. Mr. Roberts also stressed that the survey was available online for citizen access.

**Question:** Are tax delinquent properties available for use by single parent families?

**Answer:** Mr. Roberts stated that many houses are not habitable.

**Question:** Does the city have a plan to replace low income affordable housing that is being lost?

**Answer:** Mr. Roberts indicated that housing that is not habitable is housing that is mainly being lost. He stated that the city has a new affordable apartment complex, Somerby Apartments, currently under construction off Cody Road. Mr. Roberts stated that five new affordable houses located on Prichard Avenue should become available within the next four or five months and many developers are currently looking into the Campground area for construction of new affordable housing.

**Question:** How will the City address gentrification?

**Answer:** Mr. Roberts stated that the city is looking toward developing more empty lots and trying to get lots to neighbors through new programs that are being developed.

**Question:** What options will be available to residents of the R.V. Taylor housing projects?

**Answer:** Mr. Roberts stated that would be a question for the Mobile Housing Board who oversees that property.

**Comment:** Surveys should be given to each City Council representative to pass to all citizens within their district.

**Response:** Mr. Roberts indicated that each Council representative received information in regards to the City's fair housing plan.

**Comment:** The survey was not distributed broadly enough using all means and available resources; therefore it was not a very accurate representation of the community.

**Response:** Ms. Reed indicated that staff with Community and Housing Development attends many Local community meetings and also encourage citizens to attend meetings held by the City of Mobile. Ms. Reed stated that the information gathered is based on those who actually attend the meetings, which is why citizen participation strongly encouraged. Ms. Reed suggested that all those in attendance encourage citizens in their area to participate and attend the next community meeting and public hearing to voice their concerns.

**Comment:** Community and Housing Development should get more involved with the Mobile Housing Board.

**Response:** Mr. Roberts stated that the City is waiting on a new director to be chosen for the Mobile Housing Board and at that point they can work with the organization to do an assessment of available vacant units.

**Comment:** The City of Mobile Planning Commission should recommend certain areas, such as, Toulminville for new developments.

**Response:** Mr. Roberts stated that largely depends on what the merchants are looking for and there are also certain factors, such as, zoning clearances and environmental issues that must be taken into consideration when determining a location.



**Community Meeting – July 27, 2017**

The City of Mobile hosted a community meeting at the Ben May Library to provide an overview of the Assessment of Fair Housing document and specifically fair housing goals and strategies. Below is a summary of questions and comments provided by community members:

**Question:** Given your knowledge of other communities, what challenges were identified that are specific to Mobile?

**Answer:** Mobile is facing similar challenges to other communities. The process for each city is the same and can be difficult for smaller cities. There was a Supreme Court case in New York in which a community was sued and lost because they had overreached on their goals. The process is now focused on setting attainable goals. We encourage you to keep coming out to provide input throughout the process. This is a HUD mandated document, but we will also be working on another Housing Plan for the City's Community and Housing Development Department.

**Question:** These goals seem lofty and progressive for Mobile. What is the timeline to achieve these goals?

**Answer:** These goals will be incorporated into the Consolidated Plan that will be in place from May 2018 to April 2023. HUD requires that the Community and Housing Development Department demonstrate progress towards these goals.

**Question:** Can you address NIMBY in areas that have affordable housing?

**Answer:** We have the ability to distribute funds throughout the City. Overall, these concerns tend to be political. Since our HUD budget is approved in bulk by Council, this tends to not be an issue with City financed projects. We work with developers to meet local requirements before development begins.

**Comment:** You mentioned encouraging developer set asides, providing variances and subsidy. As well as, inclusionary zoning through the zoning code. You are currently developing housing in neighborhoods and one by one throughout the city. Let's do block by block.

**Response:** We are at the beginning stages of a Housing Study which will be a tool to help inform where we can build in the market and other strategic development. There may be the opportunity to engage in block by block development, specifically with rehab.

**Question:** Are you working the iTeam?

**Answer:** Yes, their work has caused the restructuring of our department. Municipal Enforcement and Community and Housing Development are now in the same department.

**Question:** Are you working with the Downtown Mobile Alliance?

**Answer:** Yes, we are working with them. They are concerned about housing in the community.

**Question:** Are there any plans to work with the residents of the Mobile Housing Board on fair housing issues?

**Answer:** We are working with the Mobile Housing Board to update their application process and prioritize applicants that are homeless. This document does not cover the board. During our process we met with a group of resident leaders. The Mobile Housing Board will have to complete their own Assessment of Fair Housing.

**Question:** Are there numbers associated with the goals?

**Answer:** The document provides more detail on the goals, including target investments.

**Question:** Several houses are being built for first time homebuyers. How much total funding is available to get people into homes?

**Answer:** We provide first time homebuyers with the opportunity to get a second mortgage on the property. We have increased the budget for down payment assistance from \$60,000 to \$250,000 over the last two years. Last year we provided funding for 30 homebuyers.

## **Consolidated Plan Community Participation Process**

### **Stakeholder Outreach**

In addition to the stakeholder outreach performed during the Assessment of Fair Housing process with, the City of Mobile consulted with leadership from the Continuum of Care, AIDS Alabama South, LLC, and additional staff from the City of Mobile. These consultations garnered additional information on needs and strategies to address homelessness, HIV/AIDS, hazard mitigation, and access to broadband.

### **Public Hearing - December 7, 2018**

A Public Hearing was conducted by the City's Community & Housing Development Department to inform community members and stakeholders of the Consolidated Plan and Program Year 2018 Action Plan process. The meeting took place at Mobile Government Plaza, located at 205 Government Street in Mobile, Alabama. In addition to providing information to the public on the process, the City's Community & Housing Development Department provided a draft Program Year 2018 Consolidated Formula Allocation for inspection and comment.

There were no comments received in this meeting. A formal written comment was received from Restore Mobile during the comment period and is included below.



Comments on City of Mobile  
Community Development Program  
Annual Action Plan FY 2018

Restore Mobile, Inc. applauds the efforts of the City of Mobile and the Community and Housing Development Department. It recognizes the need to carefully allocate the limited funds available for FY 2018. Restore Mobile encourages the City to use as many CDBG funds as possible to address blight abatement. Any housing funds which become available should be devoted to that purpose that would include unused funds from the Decent Housing Sustainability Program and the Multi-Family Rehabilitation Program. The blight abatement work could be done through grants to organizations like Restore Mobile that have a proven track record of capacity and success. Forty to \$60,000 per house will provide for a complete exterior renovation, removing it from the City of Mobile's list of blighted properties. A partial exterior renovation to ensure that the house is stabilized and fully preserved from further damage could be accomplished for \$20,000 to \$30,000 and would also remove the house from the blight list. The homes could then be sold to private developers subject to a rehabilitation agreement. Concentrating this effort within a small radius will leverage the investment of CDBG funds and attract further private investment.

Restore Mobile plans to apply for the Neighborhood Development Department's Community Reinvestment Program blight abatement funds that are currently shown in the proposed action plan to be funded in the amount of \$200,000. Restore Mobile encourages the City to ensure that these funds are accessible to organizations like Restore Mobile and that the requirements for the use of these funds are as lenient as possible pursuant to HUD or other applicable guidelines. Restore Mobile objects to any of these funds being used for demolition purposes.

Restore Mobile has a pending application for HOME funds and asks that that application be considered for the HOME funds outlined in the FY 2018 Action Plan. These funds would be used for historically appropriate infill housing south of Texas Street, in the area recently designated as a Neighborhood Redevelopment Area by Mayor Simpson.

Submitted: December 20, 2017

P.O. Box 40037 • Mobile, Alabama 36640 • 251-289-0124 • [www.restoremobile.org](http://www.restoremobile.org)

#### Community Meeting/Public Hearing - January 24, 2018

On January 24, 2018, a public hearing was held regarding the update to the City of Mobile's Consolidated Plan. The public hearing was held at 10:00am in the Ben May Main Library, an ADA-accessible public building located at 701 Government Street, Mobile, Alabama, 36602. The purpose of this public hearing was to educate the public on the plan process, review preliminary findings and gather input regarding the goals and strategies of the plan. The consolidated plan process was reviewed with the participants including integration with the Assessment of Fair Housing and specific details on the contents of the Consolidated Plan. Following that, initial progress on data analysis for the consolidated plan was shared based on the needs assessment, market analysis, homeless information and a brief summary of the approved City of Mobile Assessment of Fair Housing. There were no comments received during the hearing, at which time the hearing was closed and followed by an open community discussion.

A majority of the public hearing time was reserved for the participants to review the eight goals included in the City's Assessment of Fair Housing. These goals will serve as the foundation for the goals and strategies to be included in the Consolidated Plan. During both the hearing and the meeting, participants were asked to provide their impression on the impact each of the goals could have on improving the community based upon their knowledge and experience. Along with each goal, participants were then asked provide feedback on identified strategies, or help to create strategies to address the goals. No one in the audience wished to speak during the public hearing and the hearing was closed. The community meeting then began with each of the eight goals being reviewed with participants through a facilitated discussion. During the open community discussion, participants provided other important feedback.

The results of the feedback regarding the eight goals of the City's Assessment of Fair Housing is as follows:

- Goal 1:** Increase community engagement related to fair housing awareness  
Feedback: On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 6.7 for this goal. Of note, participants felt that using social media would allow for more fair housing awareness.
- Goal 2:** Recommend revisions to zoning code to increase access to  
Feedback: On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 6.3 for this goal. It was noted during the meeting the City is currently in process with zoning revisions and participants were encouraged to participate in that process as well regarding fair housing issues.
- Goal 3:** Increase coordination with City Departments and City/Regional  
Feedback: On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 7.2 for this goal. This was goal was tied for the third-highest mean impact score. Of the strategies recommendations from participants, two common themes were for a regular meeting of organizations working in fair housing and for there to be a common source of information, such as a website to share data and information.
- Goal 4:** Provide more housing in areas of high opportunity and reduce barriers to affordable housing  
Feedback: On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 7.2 for this goal. This was goal was tied for the third-

highest mean impact score. Of the strategies recommendations from participants, a common theme was to connect housing to better public transportation and expand public transportation options.

**Goal 5: Reduce disparities in access to opportunities**

**Feedback:** On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 8.6 for this goal. This was goal was the highest mean impact score. Of the strategies recommendations from participants, a common theme was to understand the needs of those seeking affordable housing. It is important to know the types, sizes, and amenities those units need to build successful neighborhoods.

**Goal 6: Increase fair housing capacity**

**Feedback:** On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 8.6 for this goal. This was goal was the lowest mean impact score. Of note, participants felt that facilitating an annual training session could be beneficial for housing providers.

**Goal 7: Pursue practices to eliminate structural and individual bias towards members of protected classes**

**Feedback:** On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 7.9 for this goal. This was goal was tied for the second-highest mean impact score. Of the strategies recommendations from participants, it was noted that engaging the communities regularly through dialogue is an important way to eliminate bias.

**Goal 8: Improve regional coordination**

**Feedback:** On a scale of 1 to 10 (with 1 being little impact and 10 being tremendous impact) the participants had a mean result of 7.9 for this goal. This was goal was tied for the second-highest mean impact score. A number of regional organizations were provided by participants to include in the process.

## Appendix B – Local Public Housing Data

The following data was provided by the Mobile Housing Board and is referenced in the Consolidated Plan.

### NA-35 Public Housing

#### Totals In Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,806	3,989	30	2,813	44	28	1,074

Table 6 - Public Housing by Program Type

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: Mobile Housing Board

#### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	11,435	12,322	11,444	12,717	13,401	11,727	
Average length of stay	0	0	5	8	0	8	Not Tracked	Not Tracked	
Average Household size	0	0	2	3	1	3	1	2	
# Homeless at admission	0	0	Was Not Tracked	323	1	316	6	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
# of Elderly Program Participants (>62)	0	0	771	410	30	366	13	1
# of Disabled Families	0	0	412	1109	10	1065	21	13
# of Families requesting accessibility features	0	0	5	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 7 – Characteristics of Public Housing Residents by Program Type

Data Source: Mobile Housing Board

**Race of Residents**

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	84	197	0	106	7	2	82
Black/African American	0	0	3,543	3,779	30	2,699	37	26	987
Asian American	0	0	4	5	0	2	0	0	3
Indian/Alaska Native	0	0	4	5	0	4	0	0	1
Pacific Islander	0	0	1	3	0	2	0	0	1
Other	0	0	0	0	0	0	0	0	0

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 8 – Race of Public Housing Residents by Program Type

Data Source: Mobile Housing Board

**Ethnicity of Residents**

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	22	24	0	24	0	0	0
Not Hispanic	0	0	3,614	3,965	30	2,789	44	28	1,074

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 9 – Ethnicity of Public Housing Residents by Program Type

Data Source: Mobile Housing Board

**MA-25 Public Housing**

**Totals Number of Units**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			2,665	4,306	30	3,169	50	32	1,322
# of accessible units			200						

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 10 – Total Number of Units by Program Type

Data Source: Mobile Housing Board



Grantee SF-424's and Certification(s)

OMB Number: 4940-0004  
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
<p>* 1. Type of Submission:</p> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<p>* 2. Type of Application:</p> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<p>* If Revision, select appropriate letter(s):</p> <input type="text"/>		
<p>* Other (Specify):</p> <input type="text"/>		
<p>3. Date Received</p> <input type="text" value="06/27/2018"/>		<p>4. Applicant Identifier</p> <input type="text"/>
<p>5a. Federal Entity Identifier:</p> <input type="text"/>		<p>5b. Federal Award Identifier:</p> <input type="text" value="14-219 Recruitment Grant"/>
<p>State Use Only:</p>		
<p>6. Date Received by State:</p> <input type="text"/>		<p>7. State Application Identifier:</p> <input type="text"/>
<p>8. APPLICANT INFORMATION:</p>		
<p>a. Legal Name: <input type="text" value="City of Mobile"/></p>		
<p>b. Employer/Employee Identification Number (EIN/TIN)</p> <input type="text" value="01-601110"/>		<p>c. Organizational UIC/US:</p> <input type="text" value="25019850-0000"/>
<p>d. Address:</p>		
* Street:	<input type="text" value="204 Government Street"/>	
* Street2:	<input type="text" value="South Tower, Suite 514"/>	
* City:	<input type="text" value="Mobile"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text" value="Alabama"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip/Postal Code:	<input type="text" value="36602-0001"/>	
<p>e. Organizational Unit:</p>		
<p>Department Name:</p> <input type="text" value="Community &amp; Housing Dev. Dept."/>		<p>Division Name:</p> <input type="text"/>
<p>f. Name and contact information of person to be contacted on matters involving this application:</p>		
* Prefix:	<input type="text" value="Mr."/>	* First Name: <input type="text" value="James"/>
* Middle Name:	<input type="text" value="S."/>	
* Last Name:	<input type="text" value="Korokotsis"/>	
* Suffix:	<input type="text"/>	
<p>Title: <input type="text" value="Senior Director, Neighborhood Development"/></p>		
<p>Organizational Affiliation:</p> <input type="text"/>		
* Telephone Number:	<input type="text" value="251-238-6293"/>	* Fax Number: <input type="text" value="251-238-6296"/>
<p>* Email: <input type="text" value="james.korokotsis@cityofmobile.org"/></p>		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type.</b> <input type="text"/>	
<b>* Other (specify)</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text"/>	
<b>CFDA Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="14-218 Settlement Grant"/>	
<b>* Title:</b> <input type="text" value="Community Development Block Grant"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="CDBG Project Title Obtained in FY 2010 Action Plan"/>	
<b>Attach supporting documents as specified in agency instructions.</b> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

**Application for Federal Assistance SF-424**

**16. Congressional Districts:**

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:  \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	2,347,000.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	1,175,500.00
* g. TOTAL	3,522,500.00

**19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372

**20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:


Middle Name:  Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

Application for Federal Assistance SF-424		
* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate identity:
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> New	<input type="text"/>
<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Continuation	* Other (Specify):
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	<input type="text"/>
* 3. Date Received:	4. Applicant Identifier:	
06/27/2018	<input type="text"/>	
5a. Federal Entity Identifier:	5b. Federal Award Identifier:	
<input type="text"/>	15-209 HCRK	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text"/>	<input type="text"/>	
<b>B. APPLICANT INFORMATION.</b>		
* a. Legal Name: <input type="text" value="City of Mobile"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational OUNS:	
63-0001318	010396670000	
d. Address:		
* Street1:	275 Government Street	
* Street2:	South Tower - Suite 514	
* City:	Mobile	
* County/Parish:	<input type="text"/>	
* State:	AL: Alabama	
* Province:	<input type="text"/>	
* Country:	USA: UNITED STATES	
* Zip/Postal Code:	36682-0001	
e. Organizational Unit:		
* Department Name:	* Division Name:	
Community & Housing Dev. Dept.	<input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix:	* First Name:	James
* Middle Name:	<input type="text" value="S."/>	
* Last Name:	Roberts	
* Suffix:	<input type="text"/>	
* Title: Senior Director, Neighborhood Development		
* Organizational Affiliation:		
<input type="text"/>		
* Telephone Number:	* Fax Number:	251-208-6296
251 208 6291	<input type="text"/>	
* E-mail: <input type="text" value="james.roberts@cityofmobile.org"/>		

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type:	<input type="text" value="City or Township Government"/>
Type of Applicant 2: Select Applicant Type:	<input type="text"/>
Type of Applicant 3: Select Applicant Type:	<input type="text"/>
Other (specify):	<input type="text"/>
* 10. Name of Federal Agency:	<input type="text" value="U.S. Department of Housing and Urban Development"/>
11. Catalog of Federal Domestic Assistance Number:	<input type="text"/>
CFDA Title:	<input type="text"/>
* 12. Funding Opportunity Number:	<input type="text" value="15.219 HHS"/>
Title:	<input type="text" value="HOME Investment Partnerships Program"/>
13. Competition Identification Number:	<input type="text"/>
Title:	<input type="text" value="HOME Project Titles Contained in FY 2018 Action Plan"/>
14. Areas Affected by Project (Cities, Counties, States, etc.):	<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project:	<input type="text" value="HOME Project Titles Contained in FY 2018 Action Plan"/>
Attach supporting documents as specified in agency instructions.	<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>

**Application for Federal Assistance SF-424**

16. Congressional Districts Of:

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed

17. Proposed Project:

\* a. Start Date:  \* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="062,999.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="00,000.00"/>
* g. TOTAL	<input type="text" value="62,999.00"/>

19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes", provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurance" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 4001)

I AGREE

\* The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:


Middle Name:  Last Name:

Suffix:

Title:

\* Telephone Number:  Fax Number:


\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

Application for Federal Assistance SF-424		
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	*3. Revision, select appropriate letter(s): _____ *3. Other (Specify): _____
*4. Date Received: 05/27/2018	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: 14.231.1215	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
<b>2. APPLICANT INFORMATION.</b>		
*a. Legal Name: City of Mobile		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 02-6001218	*c. Organizational DUNS: R102946E70003	
d. Address:		
* Street: 201 Government Square	_____	
* Street2: South Tower - Suite 514	_____	
* City: Mobile	_____	
* County/Parish: _____	_____	
* State: AL: Alabama	_____	
* Prefix: _____	_____	
* Country: USA: UNITED STATES	_____	
* Zip / Postal Code: 36602 0001	_____	
e. Organizational Unit:		
Department Name: Community Counseling Dev. Dept.	Division Name: _____	
f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: Mr.	* First Name: James	_____
* Middle Name: S.	_____	
* Last Name: Robertson	_____	
* Suffix: _____	_____	
* Title: Senior Director, Neighborhood Development		
* Organizational Affiliation: _____		
* Telephone Number: 251-208-6293	* Fax Number: 251-208-6295	
* Email: James.Robertson@cityofmobile.org		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text"/>	
<b>CFDA Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="11.233"/>	
<b>Title:</b> <input type="text" value="Emergency Solutions Grant Program"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span>Add Attachment</span> <span>Delete Attachment</span> <span>View Attachment</span> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="356 Project: Cities Contained In FY 2018 Action Plan"/>	
<b>Attach supporting documents as specified in agency instructions</b> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span>Add Attachments</span> <span>Delete Attachments</span> <span>View Attachments</span> </div>	



Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text"/>	* b. Program/Project: <input type="text"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="05/01/2018"/>	* b. End Date: <input type="text" value="04/30/2019"/>
18. Estimated Funding (\$):	
* w. Federal	<input type="text" value="193,122.00"/>
* f. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="193,122.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with a my resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> I AGREE	
** The list of certifications and assurances or an internet site where you may obtain this list, is contained in the encumbrance or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="William"/>
Middle Name: <input type="text" value="D."/>	
* Last Name: <input type="text" value="Washington"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor, City of Mobile"/>	
* Telephone Number: <input type="text" value="251-260-7195"/>	* Fax Number: <input type="text"/>
* Email: <input type="text" value="james.roberts@cityofmobile.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/27/2018"/>

**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 155.

W. Thompson  
Signature of Authorized Official

6/25/18  
Date

Mayor  
Title

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** - Its activities concerning lead based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

W. Thompson  
Signature of Authorized Official

6/26/18  
Date

Mayor  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** – If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** – It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** – Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

  
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Title

### **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 5 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long as the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 C.F.R. 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** - The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

W. Stimpson  
Signature of Authorized Official

6/25/18  
Date

Mayor  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> 2010 Census and ACS Data
	<b>List the name of the organization or individual who originated the data set.</b> Larry Keating of Marketek, Inc conducted the Housing Needs and Market Analysis.
	<b>Provide a brief summary of the data set.</b> It includes cost of housing, household size, housing conditions, lead poisoning risks, housing needs analysis: cost burden households, overcrowding and recommendations.
	<b>What was the purpose for developing this data set?</b> To prepare the Consolidated Plan.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2005 - 2002, and 2010
	<b>Briefly describe the methodology for the data collection.</b> This is a federal survey.
	<b>Describe the total population from which the sample was taken.</b> Citywide
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> Baesd on Census Bureau sampling system.
2	<b>Data Source Name</b> 2012 Analysis of Impediments to Fair Housing Choic
	<b>List the name of the organization or individual who originated the data set.</b> Marketek, Inc.
	<b>Provide a brief summary of the data set.</b> Low Income Housing tax Credit Database
	<b>What was the purpose for developing this data set?</b> Preparation of the City of Mobile's 2012 Analysis of Impediments to fair Housing Choice
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2011
	<b>Briefly describe the methodology for the data collection.</b> Low Income Housing Housing Tax Credit regulations

	<p><b>Describe the total population from which the sample was taken.</b></p> <p>No sampling is required</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Developers of Low Income Housing Tax Credit projects</p>