



# Analysis of Impediments to Fair Housing Choice

Mobile, Alabama

2023

May 2023

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## I. Executive Summary

The U.S. Department of Housing and Urban Development (HUD) requires that entitlement communities complete an Analysis of Impediments to Fair Housing Choice (AI) approximately every five years, at the same time as a Consolidated Plan, to inform design of local programs and housing policy. This assessment focuses on how HUD-funded federal programs and other local public and private policies and actions help to further fair housing goals or implicitly or explicitly create additional barriers, or impediments, that limit fair housing choice and access in Mobile.

Impediments to Fair Housing Choice are the factors that limit equal access to rental housing and homeownership. The impediments and their contributing factors are determined by performing quantitative and qualitative analysis of a city's demographics, housing market, and housing-related policies. The HUD Fair Housing Planning Guide defines impediments to fair housing choice as:

“Actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices.”

There are three main components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an “action, omission, or decision.”<sup>1</sup>

The City of Mobile's Community and Housing Development Department used the Analysis of Impediments to Fair Housing (AI) and Consolidated Plan development process as a means to engage with 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 residents by providing community members with a number of ways to provide additional insights and data to inform the process. In addition, the Analysis of Impediments used quantitative data to identify community demographics, economic, housing, equity, and environmental indicators, as well as mortgage lending data to inform a private sector analysis.

Based on the analysis, the following impediments to fair housing were identified:

1. Lack of Access to Affordable Housing
2. Aging and Deteriorating Housing Stock Reduces Access to Safe and Healthy Living Conditions
3. Lack of Access to Accessible Housing
4. Geographic Segregation/Unequal Access to Opportunities
5. Home Lending Disparities Reduce Access to Capital
6. Restrictive or Limited Local Land Use Regulations and Policies
7. Exposure to and Remediation of Environmental Hazards

The following recommendations are intended to help guide the City and its partners toward reaching fair housing goals in Mobile over the next five years by addressing the impediments above.

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<sup>1</sup> Fair Housing Planning Guide, Vol. 1, HUD, <https://www.hud.gov/sites/documents/FHPPG.PDF>

<b>Impediment #1: Lack of Access to Affordable Housing</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
1.1	Encourage the MHA to create a relocation plan whenever public housing is scheduled for demolition or rehabilitation and work with the MHA to conduct outreach and access to the plan.	Mobile Housing Authority (MHA) Neighborhood Development	1-3 years	
1.2	Explore feasibility to expand City housing code to include protections for “source of income” from discrimination that bars landlords from refusing to rent based on lawful source of income to increase acceptance of HCVs.	City Council	1-2 years	Ordinance 28-050, passed November 8, 2022 <sup>2</sup>
1.3	Explore feasibility to update zoning regulations to allow group living accommodations (5 or more persons), emergency shelters, and elderly housing by-right in more districts.	Planning and Zoning Division	1-2 years	Unified Development Code (UDC)
1.4	Recommend updating the future land use plan to allow for more missing middle development and density around job centers, not just downtown.	Planning and Zoning Division	2-5 years	UDC, Map for Mobile
1.5	Explore feasibility of providing development incentives for affordable housing in both low-income areas that need investment and areas of high opportunity.	Neighborhood Development, MHA	2-5 years	Map for Mobile, Neighborhood toolkit
1.6	Explore opportunities to leverage funding or partner with state and foundations to support production of affordable housing.	MHA, Neighborhood Development	2-3 years	HOME-ARP as leverage with tax credits for proposed shelter development
1.7	Improve regional coordination between the City, Mobile Housing Authority, Legal Services Alabama, Center for Fair Housing, Mobile Continuum of Care partners, and service partners to prioritize	Neighborhood Development	2-3 years	Continuum of Care 10-year plan, partnerships with current service providers

<sup>2</sup> An Ordinance to Adopt a Housing Code for the City of Mobile, 28-050 November 8, 2022  
<https://www.cityofmobile.org/uploads/22110901134528-050.pdf>



	development of public and subsidized housing.			
1.8	Explore feasibility of incentivizing development of apartments with 3 or more bedrooms via development incentives such as fee waivers or expedited permitting.	Planning and Zoning Division	1-2 years	UDC update
1.9	Work with community organizations and explore opportunities to seek funding to expand and advertise utility assistance programs, especially for seniors and fixed-income homeowners.	Neighborhood Development, local community organizations	2-3 years	Use ARP-funded utility assistance program as model
1.10	Explore feasibility of adopting short term rental legislation that will balance the needs of residents and the City's affordable housing stock as traditional rental or owner-occupied units.	Planning and Zoning Division	2-3 years	UDC update
1.11	Leverage the primary single-family zoning category (R-1 Residential) for affordable homeownership opportunities in coordination with the Housing Choice Voucher (HCV) Program for homeownership.	Neighborhood Development, MHA, Planning and Zoning Division	1-2 years	UDC update

<b>Impediment #2: Aging and Deteriorating Housing Stock Reduces Access to Safe and Healthy Living Conditions</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
2.1	Explore opportunities to leverage all available funding sources to expand home repair efforts to offer more loans and/or grants.	Neighborhood Development	3-5 years	CDBG Home Rehabilitation Program
2.2	Pursue better coordination with the Mobile Community Action Agency in their endeavors related to home rehabilitation.	Neighborhood Development, Mobile Community Action Agency	2-3 years	CDBG Home Rehabilitation Program
2.3	Consider using the Code Enforcement Division to inspect tenant-occupied properties that are flagged for unhealthy/unsafe living conditions, such as mold, structural integrity, open to elements. Moreover, explore policies that provide the ability for tenants to withhold rent under	Code Enforcement Division, Legal Department, Neighborhood Development	1-2 years	Code enforcement

	circumstances of unsafe/unhealthy living situations.			
2.4	Consider expedited permit review of repairs to vacant or blighted housing units in historic districts to bring available housing back to commerce.	Historic Development, Planning and Zoning Division, Permitting	1-2 years	Blight survey and blight removal

<b>Impediment #3: Lack of Access to Accessible Housing</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
3.1	Pursue a qualified nonprofit to design a grant program for landlord or tenant applicants to apply for accessibility upgrades.	Neighborhood Development, local nonprofit organizations	2-5 years	CDBG Homeowner Rehabilitation Program
3.2	Develop and promote technical assistance guidance about accessibility standards and requirements for developers and property owners, particularly for multi-family developments.	Planning and Zoning Division, Permitting, Local disability advocacy groups	1 year	
3.3	Research the feasibility of developing incentives, based on available funds, for projects that include accessible design elements based on Universal Design, <sup>3</sup> such as wide doorways, ramps, lever door handles, flush thresholds, and audible and visual notification systems.	Planning and Zoning Division, Permitting	2-3 years	HOME Affordable Housing Development
3.4	Develop and promote resources for residents to understand and utilize reasonable accommodations requests and/or file an ADA complaint.	Neighborhood Development, Communications, Center for Fair Housing	1 year	

<b>Impediment #4: Geographic Segregation/Unequal Access to Opportunities</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
4.1	Continue supporting City's ADA infrastructure upgrade plan to ensure compliance and identify	Engineering Department, Public Works,	2-3 years	ADA infrastructure upgrade plan

<sup>3</sup> National Association of Home Builders. What is Universal Design? Available at: <https://www.nahb.org/other/consumer-resources/what-is-universal-design>

	areas of need for improved public infrastructure (sidewalks, streetlights) in the city.	Neighborhood Development		
4.2	Consider setting aside funding in the Capital Improvement Plan to continue expanding parks in the eastern side of the city.	Parks and Recreation, Public Works	2-5 years	Current efforts to expand greenways, Capital Improvement Plan
4.3	Provide information on state and federal programs that reduce the cost of broadband service for low-income residents and coordinate when possible with Alabama Public Service Commission representatives to highlight the need to expand broadband coverage and access to those receiving housing assistance.	Neighborhood Development	1-2 years	Affordable Connectivity Program <sup>4</sup> , Capital Projects Fund <sup>5</sup>
4.4	Work with the Mobile Metropolitan Planning Organization on transit planning efforts to evaluate current bus routes to ensure that concentrations of low-income households are connected to jobs, healthcare, recreation, and other amenities.	Wave Transit, Mobile Metropolitan Planning Organization, Neighborhood Development	3-6 years	Current efforts to expand transit
4.5	Expand biking infrastructure throughout the city, especially connecting job centers and neighborhoods.	Public Works, Traffic Engineering, ALDOT	3-6 years	Capital Improvement Program, Current efforts to expand greenway
4.6	Consider opportunities to work with Legal Services to expand access to fair housing resources by facilitating discussions in different neighborhoods.	MHA, Legal Services	1 year	
4.7	Explore opportunities to work with nonprofits to integrate wraparound supportive services into workforce development programs, including job training, job placement, and childcare assistance.	Neighborhood Development, MHA, local nonprofit organizations	1-2 years	Existing workforce development programs, Office of Supplier Diversity training and outreach, Bishop State Community College,

<sup>4</sup> Internet for All. Affordable Connectivity Program. Available at: <https://www.internetforall.gov/program/affordable-connectivity-program>.

<sup>5</sup> Internet for All. Capital Projects Fund. Available at: <https://www.internetforall.gov/program/capital-projects-fund>

				Mobile Area Workforce Alliance
4.8	Recommend holding hybrid meetings regarding fair housing, virtual and in-person, and consider alternating location of in-person public meetings such as neighborhood libraries and community organizations to expand access	City Council, Neighborhood Development	6 months-1 year	City Council Meeting Live Stream, City use of social media, City Neighborhood Resource Center
4.9	Publish and advertise clear directions and contact information (through website postings, social media, bulletin boards, fliers) about how to report fair housing violations.	MHA, Center for Fair Housing, Legal Services Alabama	6 months-1 year	

Impediment 5: Home Lending Disparities Reduce Access to Capital				
	Recommendation	Responsible Agency	Timeframe	Existing Actions
5.1	Continue building relationships with financial institution to encourage investments and/or partnerships to support low-income neighborhoods through lending activities.	Neighborhood Development - Office of Supplier Diversity	1-2 years	Building Alabama Reinvestment
5.2	Work with MHA to develop resources and financial education for low- to moderate-income borrowers to help navigate the home buying process.	MHA, Neighborhood Development	1-2 years	City HoPE (Homeownership Provides Equity) Initiative
5.3	Continue engagement efforts between the Office of Supplier Diversity and the local lending community to encourage lenders to reinvest in areas with majority-minority populations, include FHA loans in their portfolios, and take HCVs into account when approving home loans.	Neighborhood Development - Office of Supplier Diversity	2-3 years	2023-2028 Consolidated Plan
5.4	Recognize (through social media, City website, newsletters) financial institutions with a record of supporting fair housing initiatives.	Mayor's Office, Neighborhood Development, Communications	1-2 years	

<b>Impediment #6: Restrictive or Limited Local Land Use Regulations and Policies</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
6.1	Recommend revision of zoning code to encourage development of, and access to, affordable housing options, such as, allow accessory dwelling units (ADUs) by right in more zoning categories, loosen setback and other site development standards in low-density zoning districts, and allow mixed-use and multi-family developments by right in more zoning districts.	Planning and Zoning Division, City Council, Planning Commission, Board of Zoning Adjustment	2-3 years	UDC, Neighborhood toolkit, 2023-2028 Consolidated Plan
6.2	Recommend density bonuses for 30 percent and 50 percent AMI affordable housing around job and transit centers	Planning and Zoning Division, Planning Commission	1-2 years	UDC
6.3	Explore opportunities to increase coordination with City departments and City/Regional planning entities, as capacity and funding allows.	MHA, Neighborhood Development	1-2 years	2023-2028 Consolidated Plan
6.4	Continue to attempt to appoint representatives to the Planning Commission and Zoning Board of Adjustments that more accurately reflect the residents of the City in gender, race, ethnicity, and income level.	Mayor, City Council, Planning and Zoning Division	1-2 Years	Existing appointment procedure and applications to boards

<b>Impediment #7: Exposure to and Remediation of Environmental Hazards</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
7.1	Explore opportunities to strengthen building code standards to assess appropriate development and rebuilding standards in high flood risk areas	Engineering, Planning and Zoning Division	2-5 years	The Building Code of the City of Mobile
7.2	Continue and consider expanding trainings with Bishop State at the City's nonprofit resource center to build local capacity and increase the number of local contractors that are	Neighborhood Development, Bishop State, SafeState Alabama, Permitting, Planning and Zoning Division, Mobile	2-3 years	Contractor's College

	certified in lead and asbestos abatement.	County Health Department		
7.3	Conduct a training for City staff and interested contractors about fortified construction, special flood hazard zones, the risks of flooding, and the impacts on property insurance.	Planning and Zoning Division, Environmental Services, Communications, Mobile County Health Department	6 months-1 year	
7.4	Provide technical assistance (webinars, resources on City website, social media) for homeowners on flood mitigation measures at home.	Planning and Zoning Division, Environmental Services, Stormwater Management	1-2 years	CDBG Homeowner Rehabilitation Program
7.5	Explore feasibility of developing indoor air quality standards for new developments in proximity to high-traffic, polluting roadways. When possible, encourage more infill housing development away from major roadways to help deconcentrate housing away from pollution corridors.	Planning and Zoning Division, Neighborhood Development	2-3 years	UDC, Map for Mobile

## II. Introduction

### A. Fair Housing

The U.S. Department of Housing and Urban Development (HUD) requires that entitlement communities complete an Analysis of Impediments to Fair Housing Choice (AI) approximately every five years, at the same time as a Consolidated Plan, to inform design of local programs and housing policy. The City of Mobile, through its Community and Housing Development Department (CHD), currently administers a variety of HUD-funded federal programs, including:

- Community Development Block Grant Program (CDBG)
- HOME Investment Partnership Program (HOME)
- Emergency Solutions Grant Program (ESG)

These programs help to address an array of housing and community needs in the jurisdiction, including housing affordability, access to housing, homelessness, and other public services and improvement gaps. This assessment focuses on how these programs, coupled with other local public and private policies and actions, help to further fair housing goals or implicitly or explicitly create additional barriers that impede fair housing choice and access in Mobile.

### B. Definitions

#### 1. Fair Housing Choice

The U.S. Department of Housing and Urban Development (HUD) enforces the Fair Housing Act, which prohibits discrimination and the intimidation of people in their homes, apartment buildings, and condominium developments in nearly all housing transactions, including the rental and sale of housing and the provision of mortgage loans. Fair Housing Choice refers to equal access to rental housing and homeownership. Housing providers who refuse to rent or sell homes to people based on race, color, national origin, religion, sex, familial status, or disability are violating federal law.<sup>6</sup>

#### 2. Impediments to Fair Housing Choice

Impediments to Fair Housing Choice are the factors that limit equal access to rental housing and homeownership. The impediments and their contributing factors are determined by performing quantitative and qualitative analysis of a city's demographics, housing market, and housing-related policies.

The HUD Fair Housing Planning Guide defines impediments to fair housing choice as:

- “Actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices.”

There are three main components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.

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<sup>6</sup> Fair Housing Equal Opportunity for All Booklet HUD,  
[https://www.hud.gov/sites/documents/FHEO\\_BOOKLET\\_ENG.PDF](https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF)

2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an “action, omission, or decision.”<sup>7</sup>

Through an assessment process, some of the identified potential barriers, or symptoms of barriers to housing choice, may be linked to one or more federally protected classes or to a particular action, omission, or decision. HUD’s definition of an impediment to fair housing choice does not specify responsible actors for the actions, omissions, or decisions taken, so it is important to acknowledge that in many cases, the local government may not be the responsible actor. It is also sometimes not feasible to identify an original responsible party or a specific action, omission, or decision, but quantitative or qualitative evidence could indicate one or many potential contributors to the impediment. This report is designed to identify as many potential impediments as possible and offer ways for the city government and/or its partners to address challenges, regardless of the original cause or responsible party.

Additionally, some potential barriers do not necessarily fall within HUD’s definition of “impediment” or require more in-depth research but have been noted in this document to provide context and additional information regarding current fair housing conditions in the City of Mobile.

### 3. Federally Protected Classes

Federally protected classes are groups of people with certain demographic characteristics who are protected from discrimination by the Fair Housing Act. Protected characteristics are based on race, color, national origin, religion, sex, familial status, and disability.

## III. Community Participation Process

It is integral to the Analysis of Impediments process to ensure that community voice and concerns are captured. The City of Mobile’s Community and Housing Development Department used the Analysis of Impediments to Fair Housing (AI) and Consolidated Plan development process to engage with 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 stakeholders by providing community members with a number of ways to submit insights and data that informed the process and outcomes.

The City of Mobile’s Community and Housing Development Department built on the community engagement activities of the AI to gather additional information and further understand the community development needs in and around Mobile, Alabama. The information gathered through stakeholder outreach provided important qualitative data and directly informed goal-setting for the AI. Community engagement activities resulted in a broader understanding about the need for accessible and quality affordable housing and insight into organizational capacity and community development needs.

### A. Stakeholder Interviews

A series of interviews were conducted between January 27, 2023 and March 3, 2023 with representatives of community organizations that provide housing, meet community needs, or are otherwise directly involved in fair housing concerns. Thirty-eight stakeholder organizations were contacted for an interview and 25 interviews took place to provide qualitative understanding of the fair

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<sup>7</sup> Fair Housing Planning Guide, Vol. 1, HUD, <https://www.hud.gov/sites/documents/FHPG.PDF>



housing issues and opportunities in Mobile. Representatives from the stakeholder organizations listed in Table 1 were interviewed for this report.

*Table 1: Stakeholder Organizations*

Organization
Affordable Housing Gulf Coast
AIDS Alabama
Alabama Disability Advocacy Program, University of Alabama
Alethia House - Special Kind of Caring
Bishop Community College (HBCU)
Boys & Girls Clubs of South Alabama
Center for Fair Housing, Inc.
Center for Healthy Communities, University of South Alabama
City of Mobile, Chief Resilience Officer
City of Mobile, Procurement
Dumas Wesley Community Center
Fuse Project
Housing First Inc.
Legal Services of Alabama
Lifelines Counseling Services
Martin Luther King Avenue Redevelopment Corporation
Mobile Chamber of Commerce
Mobile Housing Authority
Providence Hospital Outreach - Guadalupe Center
Salvation Army
Sold by Ellis G Realty
Sybil H. Smith Family Village (Dumas Wesley Community Center)
Toulminville-Crichton CDC
United Way of Southwest Alabama
Volunteers of America Southeast

Key themes from the interviews are listed below separated by area of concern. The stakeholder interview question guide is provided in Appendix A.

**Fair and Affordable Housing**

- Stakeholders identified a lack of affordable units as a barrier to accessing housing. There is a need for more affordable housing stakeholders and organizations working in this area.
- Some abandoned properties are difficult to return to commerce because of inadequate homeowner estate planning and inherited properties without clear title.
- Inventory of new construction is not on pace with the job growth. The lack of affordable workforce housing and partnership with private developers are major challenges.
- Issues with landlords raising rents and not accepting Housing Choice Vouchers or subsidy payments; no source of income protections

- Public housing was identified as inadequate, especially for families and individuals with disabilities. There is a need to look at new ways to fund housing, either with layering of resources or alternate sources of funding.
- There is lack of awareness among the public about fair housing and the right to submit a complaint.
- There are not enough multi-family housing options, especially not a lot of mixed-income multi-family housing options. Location of new multifamily developments are placed further from jobs.

### **Partnerships**

- Stakeholders identified a need for more affordable housing advocates and organizations.
- The City and housing organizations should work to form more partnerships with housing providers and developers.
- Nonprofits are unclear about the roles and relationships between public agencies, which makes it difficult to partner or collaborate.
- There are a lack of resources and tools to communicate to the community about housing needs and opportunities.

### **Community Services and Access**

- Stakeholders identified a need for more wraparound supportive services, such as resources for employment, childcare, healthcare, and mental health services, in addition to decent, affordable housing.
- There is a lack of emergency shelter space available in the city for unhoused residents.
- There is a disconnect between public transit and affordable housing in the city. Buses do not cover all the city, and schedule limitations make it difficult to connect residents to employers, job fairs, and employment programs.
- Communicating with the public is challenging given that there is no daily print newspaper and housing resources are often posted in a single location with limited lead time to participate.
- Council members and government officials are viewed as responsive in some neighborhoods but not others; public meetings and council member office hours should be in accessible public locations around the city.
- There is a disparity between neighborhoods in terms of public and private investments (infrastructure, property maintenance, etc.). Investments are often made along district lines that map to racial disparities.
- Low- to moderate-income (LMI) areas are over-burdened with limited access to businesses and transportation; and community perception of high crime rates, which discourages investments and community events.
- Where public infrastructure for community access exists, such as, parks and bike lanes, they are perceived or unsafe in some areas.

### **Workforce Development**

- The Chamber of Commerce is the primary entity that manages workforce development and recruits talent to Mobile. The Chamber has been looking into how to best support housing, education, and recreational amenities.
- Respondents noted a disconnect between well-paying jobs and hiring residents for those jobs. There is a disconnect between abundant industries and high-paying jobs. Stakeholders identified this as a reflection of a poor education system and a lack of interest or access to job training programs.

## B. Community Needs Survey

The City hosted an online public survey between February 1 and February 21, 2023 to inform the Consolidated Plan and Analysis of Impediments to Fair Housing. The survey web-link was distributed by stakeholders and the City advertised the survey on social media and its website. The survey included questions about housing needs, challenges, public services, discrimination, and opportunities or recommendations. A complete analysis of survey results is available in Appendix B. It should be noted that respondents were not required to answer every question and all demographic questions were optional. The survey garnered 137 responses to at least some of the questions. It should be noted that the demographics of the survey respondents are not representative of the demographics of the city, with survey respondents being more proportionally homeowners, higher income, and white than the overall city of Mobile. Therefore, the takeaways may be more appropriately understood through the lens of those demographic groups. However, additional data collection and analysis, including stakeholder interviews and quantitative data analysis from reputable sources, supplement the survey responses to help mitigate the under-representation of some demographic groups from the survey.

Key takeaways are listed below by area of concern:

### **Housing Condition**

- Twenty-eight percent of respondents identified that they thought the physical housing conditions in their neighborhoods were improving and 25 percent thought conditions were declining.
- The majority of survey respondents (86 percent) noted that abandoned and/or foreclosed properties are a critical issue in the city.
- Many of the open-ended comments called for abandoned properties to be torn down or repaired using a revolving fund or tax incentives to return them back to the market, especially if for affordable housing.
- Other housing concerns included a need for increased property maintenance and housing repair, the large amount of run down/ derelict houses, a need for more available units, and the rapid increase of permanent housing converting to short term rentals.

### **Affordability**

- Respondents ranked safe and affordable housing as the highest community development need.
- For respondents that wanted to move homes but could not, the most cited reason was affordability.
- In elaborating on housing and affordability needs, respondents noted the need for affordable, attractive housing like townhomes; more density, missing middle housing, affordable housing

and apartments for young people and, blue-collar workers; more rent and utility assistance; more Housing Choice Vouchers for low-income families, subsidized housing for elderly people; and concerns over the large waitlist for public housing.

### **Neighborhood condition**

- When asked what they would change about their neighborhood, the top responses were streets/sidewalks (39), housing (16), trash (15), crime (13), community amenities (12), and other.
- On a review of the open-ended responses, many mentioned gun crime, feeling safe only in the immediate neighborhood but being unwilling to venture further out, and car theft. Over one third of respondents listed conditions of sidewalks and streetlights as a critical issue in their neighborhood.
- Respondents also want more biking and public transit infrastructure.

### **Economic conditions**

- Most survey respondents (79 percent) perceived economic development/job creation to be a critical issue.
- Respondents noted the need for higher wage jobs, better housing to attract job opportunities, better education and public school system, increased workforce training, and better opportunities for youth.
- There was concern about hiring locals over transplants.
- There was specific concern about the lack of opportunity in Cottage Hill, Azalea, Plateau, and Africatown neighborhoods.

### **Discrimination**

- The top reasons survey respondents felt they had been discriminated for housing included income too low, bad credit, other buyer paid cash or a higher price, and source of income.
- While sixteen respondents felt they had been discriminated against, only three respondents communicated with the Center for Fair Housing, Mobile Housing Authority, or the Mayor's office.

### **Challenges**

- Of the respondents who were unhappy with their current living situation, the most common reasons were price, safety, and poor housing conditions.
- Other responses for unhappiness included nearby homes being poorly maintained or having trash issues (5), too much crime in their neighborhood - including domestic violence and car theft (5), speeding through the nearby streets making it dangerous to walk (2), poor street lighting, lack of community amenities, and lack of enforcement around smoking in apartments.

## **IV. Demographics and Economic Overview**

### **A. Demographic Profile**

This section provides an overview of key socioeconomic indicators to understand the City of Mobile. Demographic and economic data provides insight into the patterns that may impact housing choice with

emphasis on understanding the needs of protective classes. Unless otherwise noted, most of the data that follows is the most current available, gathered from the 2021 Community Survey (ACS) Five-Year Estimates.

### **Key Data and Insights:**

#### **Demographic Trends**

- Population has been slightly decreasing in Mobile for the past seven years, from 194,669 residents in 2015 to 187,445 residents in 2021.<sup>8</sup>
- Mobile is a majority-minority city. The racial composition of Mobile is 49.2 percent Black, 44.9 percent White, 2.4 percent Hispanic, and 1.8 percent Asian. The percent population of White, Non-Hispanic residents has decreased by about 10 percent in the last four decades while the percent population of Black, Non-Hispanic residents has increased by about 10 percent in the last four decades.<sup>9</sup>
- 13.7 percent of Mobile’s population is over 65 while 24.2 percent is children under 18<sup>10</sup>, both populations have special considerations for housing needs.
- The number of families and household size of Mobile has been decreasing. It is unclear if this is due to natural change in demographic trends, or because families are having trouble finding housing in Mobile. The majority of households in Mobile are small, family households comprised of less than five members.

#### **Economic Trends**

- Of all Mobile households, 16.6 percent are very-low-income (under 30 percent median household income) and 13.8 percent are low income (30-50 percent median household income). Almost one-third of the households in Mobile made less than \$25,000<sup>10</sup>
- Twenty percent of the total population of Mobile lives in poverty. Almost one third of the city’s children are living in poverty.<sup>10</sup>
- The top three employment sectors by the number of workers employed are: education and health care services, retail trade, arts, entertainment, and accommodations.<sup>10</sup> Many of the jobs, especially in retail and arts, may not provide a living wage to Mobile residents and may also be highly susceptible to tourism and weather shocks.
- The majority of renters had lived in their home since at least 2018 indicating that most renters are longer term.

### **1. Change in Population**

Mobile’s population has been decreasing for the last seven years, with a decrease from 194,669 residents in 2015 to 187,445 residents in 2021 (Figure 1).

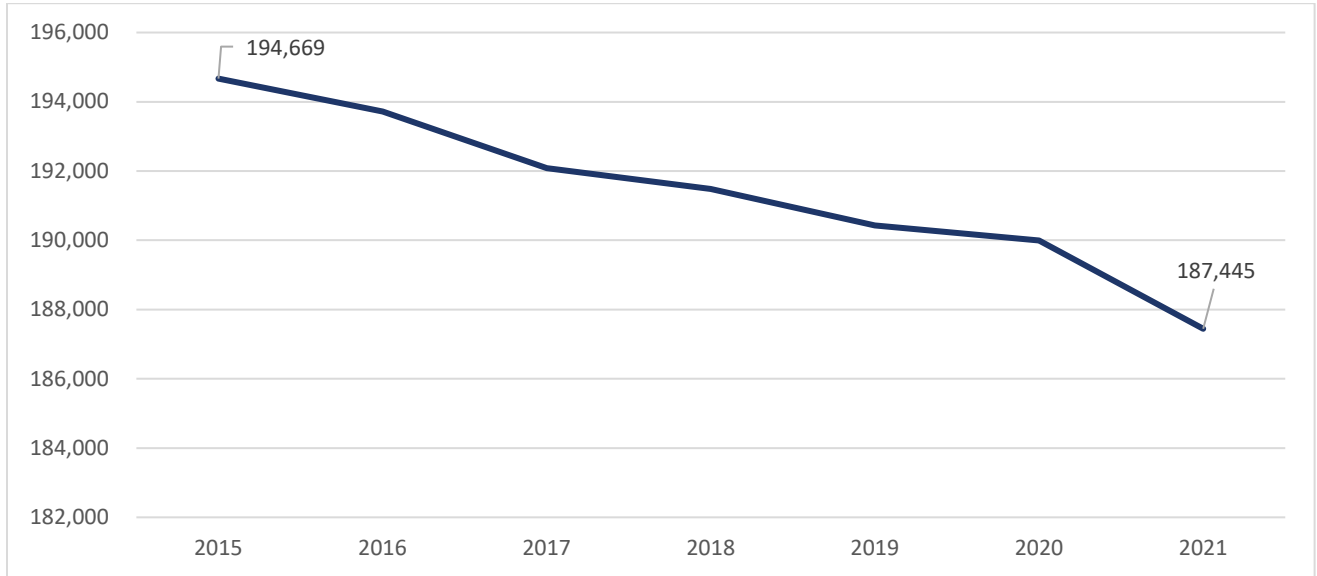
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<sup>8</sup> Source: U.S. Census Bureau, 2011 – 2015, 2012 – 2016, 2013 – 2017, 2014 – 2018, 2015-2019, 2016 – 2020, 2017 – 2021 American Community Survey 5-Year Estimates

<sup>9</sup> AFFHT Tool 2020 Data Decennial Census, ACS

<sup>10</sup> 2017-2021 American Community Survey 5-Year Estimates.

Figure 1: Mobile Population over Time



Source: U.S. Census Bureau, 2011 – 2015, 2012 – 2016, 2013 – 2017, 2014 – 2018, 2015-2019, 2016 – 2020, 2017 – 2021 American Community Survey 5-Year Estimates

## 2. Race and Ethnicity

The table below shows the City of Mobile is 49.2 percent Black and 44.9 percent White residents. For ethnicity, Hispanic residents are less than 3 percent of the total population.

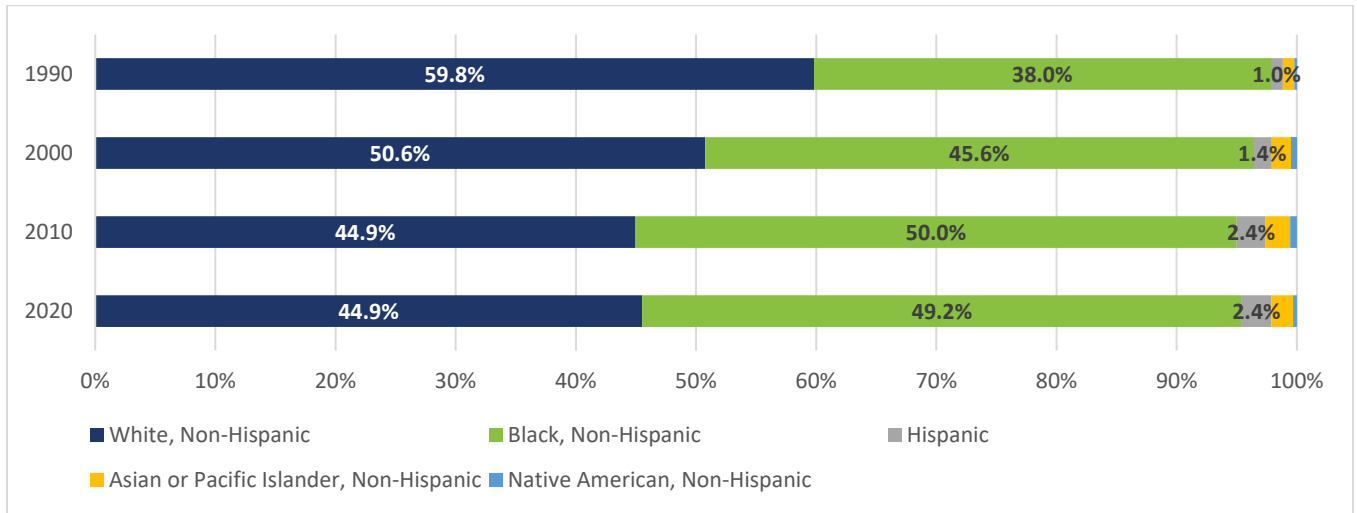
Table 2: Mobile Race and Ethnicity

Race/Ethnicity	Number	Percent
White, Non-Hispanic	87,613	44.9%
Black, Non-Hispanic	96,081	49.2%
Hispanic	4,677	2.4%
Asian or Pacific Islander, Non-Hispanic	3,495	1.8%
Native American, Non-Hispanic	607	0.3%
Two or More Races, Non-Hispanic	2,423	1.2%
Other, Non-Hispanic	215	0.1%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

The below figure shows the change in demographics over time. Mobile has become more diverse with a decreasing percent of White, Non-Hispanic (59.8 percent in 1990 to 44.9 percent in 2020) and an increasing percent of Black, Non-Hispanic (38 percent in 1990 to 49.2 percent in 2020), Hispanic (1 percent in 1990 to 2.4 percent in 2020), Asian or Pacific Islander, Non-Hispanic (0.96 percent in 1990 to 1.8 percent in 2020), and Native American, Non-Hispanic (0.2 percent in 1990 to 0.3 percent in 2020).

Figure 2: Change in Population Over Time



Source: AFFHT Tool 2020 Data Decennial Census, ACS

### 3. Age

For Mobile, persons over 65 are about 17 percent of the total population and persons under 18 make up 22 percent of the population, but there was not a significant change in either population since 2017. Both persons under 18 and over 65 often have specialized needs in housing accessibility and connectivity.

Table 3: Age Groups in Mobile over Time

	2017	2021
Under 18	22.0%	21.6%
18 to 24	10.6%	10.2%
25 to 44	26.9%	26.7%
45 to 64	25.0%	24.8%
65 to 74	8.8%	9.9%
75+	6.7%	6.7%

Source: 2017-2021 American Community Survey 5-Year Estimates.

### 4. Sex

The City of Mobile is majority female. Currently, the Census does not collect data on gender identity or include options for respondents to select anything outside of male and female.

Table 4: Sex, Mobile

Sex	Number	Percent
Male	91,821	47.1%
Female	103,290	52.9%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

## 5. Disability

The table below shows the percentage of residents in Mobile that have a disability, showing that ambulatory care disabilities are most common at more than 9 percent of each population. All disabilities may require special living accommodations that should be considered in fair housing. 6.3 percent or 11,029 jurisdiction residents have independent living difficulties that may necessitate unique living arrangements.

Table 5: Disability Type, Mobile

Disability Type	Number	Percent
Hearing difficulty	6,104	3.5%
Vision difficulty	5,649	3.2%
Cognitive difficulty	11,123	6.4%
Ambulatory difficulty	16,213	9.3%
Self-care difficulty	5,981	3.4%
Independent living difficulty	11,029	6.3%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

## 6. Limited English Proficiency

For those with Limited English Proficiency (LEP), the top language in the jurisdiction is Spanish (4,700 speakers), followed by Other & Unspecified (1,030 speakers), and Vietnamese (905 speakers).

Table 6: Limited English Proficiency Languages, Mobile

Limited English Proficiency (LEP) Language	Language	Number Speakers	Percent
#1 LEP Language	Spanish	4,700	2.6%
#2 LEP Language	Other & Unspecified Language	1,030	0.6%
#3 LEP Language	Vietnamese	905	0.5%
#4 LEP Language	Other Indo-European Language	820	0.5%
#5 LEP Language	West Germanic Language	470	0.3%
#6 LEP Language	French	400	0.2%
#7 LEP Language	Tagalog	320	0.2%
#8 LEP Language	Slavic Language	200	0.1%
#9 LEP Language	Other Asian & Pacific Language	185	0.1%



Limited English Proficiency (LEP) Language	Language	Number Speakers	Percent
#10 LEP Language	Chinese	130	0.1%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

## 7. Household Characteristics

The number of households in Mobile has increased while the household size has decreased. At the same time, the number of families and percent of families with children has decreased in Mobile. While the population in Mobile has decreased over time, the increasing number of households, along with a dynamic member makeup might indicate a need to support different housing unit sizes and layouts.

Table 7: Change in Households and Families Over Time

	2017	2021	Percent Change Over Time
Total households	76,097	77,515	1.9%
Average household size	2.42	2.35	-2.9%
Total families	44,059	42,610	-3.3%
Average family size	3.26	3.24	-0.6%

Source: U.S. Census Bureau, 2013-2017 & 2017-2021 American Community Survey 5-Year Estimates.

In 2020, 43.3 percent of all family households were families with children. At the same time, family households with less than five people were the most common household type in Mobile making up 52.1 percent of all households and large households 5+ people were the most uncommon at 6.4 percent of all households.

Table 8: Families with Children Over Time in Mobile CDBG Jurisdiction

Year	1990		2000		2010		2020	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Families with children	25,933	48.6%	23,178	47.9%	21,115	43.3%	21,115	43.3%

Source: AFFHT Tool 2020 CHAS

Table 9: Household Types

Household Type and Size	Number	Percent
Family households, <5 people	39,704	52.1%
Family households, 5+ people	4,888	6.4%
Non-family households	31,620	41.5%
Total Households	76,212	

Source: AFFHT Tool Decennial Census; ACS

B. Economic Overview

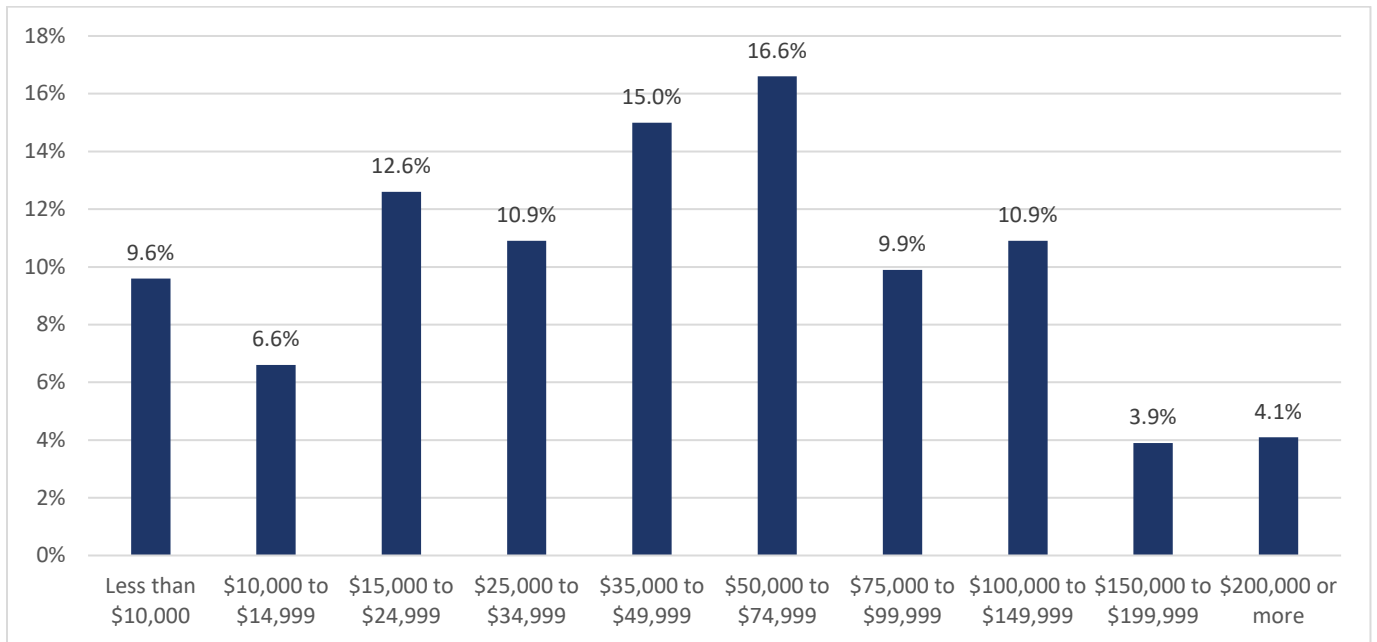
1. Income Profile

Roughly 44 percent of all households in Mobile live above 100 percent of area median household income (\$44,780), while 47 percent of Mobile households live with incomes below 80 percent of the median household income. Of all Mobile households:

- 16.6 percent are very-low-income (under 30 percent median household income)
- 13.8 percent are low income (30-50 percent median household income)
- 16.4 percent are moderate-income (50-80 percent median household income)

In 2021, the median household income was \$44,780. Almost one-third of the households in Mobile made less than \$25,000 (Figure 3). Further, 16.2 percent of households had incomes less than \$15,000.

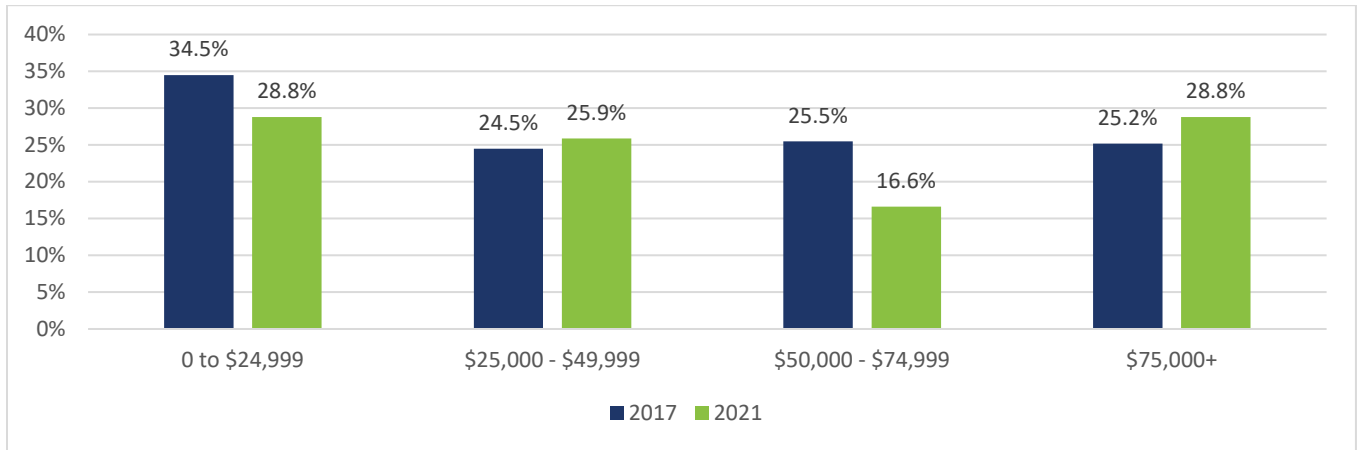
Figure 3: Household Incomes in Mobile



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

The composition of household income has slightly changed in Mobile in the last five years with fewer low-income households making \$0 to \$24,999 and more households making more than \$75,000 (Figure 4).

Figure 4: Change in Household Income in Mobile, 2017–2021



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

While the median household income is \$44,780, the income of married-couple families is substantially higher at \$82,976 and the income of nonfamily households is lowest at \$30,041 (Table 10).

Table 10: Median Income by Type of Household Mobile

	Households	Families	Married-couple families	Nonfamily households
Median income (dollars)	\$ 44,780	\$ 59,444	\$ 82,976	\$ 30,041

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

## 2. Poverty

Mobile has significant poverty rates disproportionately affecting children. The Census defines poverty using “a set of money income thresholds that vary by family size and composition” determined yearly that is uniform across the country.<sup>11</sup> Twenty percent of the total population of Mobile lives in poverty. Almost 1/3 of the city’s children are living in poverty. The trauma of childhood poverty has far reaching impacts late into adulthood on early mortality, increased disease morbidity, and increased lifetime chronic physiological stress.<sup>12</sup>

Table 11: Poverty by Age Mobile

	Total	Below poverty level	Percent below poverty level
Under 18 years	39,885	12,610	31.6%

<sup>11</sup> U.S. Census. Persons in poverty, percent. Available at: <https://www.census.gov/quickfacts/fact/note/US/IPE120221>.

<sup>12</sup> Gary Evans (2016). Childhood Poverty and Adult Psychological Well-Being. Available at: <https://www.pnas.org/doi/abs/10.1073/pnas.1604756114>

	Total	Below poverty level	Percent below poverty level
18 to 64 years	112,465	20,772	18.5%
65 years and over	30,393	3,114	10.2%
Population for whom poverty status is determined	18,2743	36,496	20.0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

While 20 percent of Mobile’s population lives in poverty, the burden disproportionately falls on Black or African American residents, of whom 27 percent live in poverty. Every other racial or ethnic subpopulation has a poverty level that is equal to or less than the average percent.

Table 12: Poverty by Racial/Ethnic Group Mobile

	Total	Number below the poverty level	Percent below poverty level
White alone	75,187	8,553	11.4%
Black or African American alone	96,522	26,017	27.0%
American Indian and Alaska Native alone	340	11	3.2%
Asian alone	3,415	690	20.2%
Native Hawaiian and Other Pacific Islander alone	38	0	0.0%
Some other race alone	1,648	292	17.7%
Two or more races	5,593	933	16.7%
Hispanic or Latino origin (of any race)	4,707	690	14.7%
White alone, not Hispanic or Latino	73,458	8,355	11.4%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

### 3. Employment

The Mobile labor force is made up of 87,274 residents, of which, 81,668 are employed. The unemployment rate of 6.4 percent is down slightly from 6.5 percent in 2018. The median earning for a worker is \$31,736, but male, full time, year-round workers earn \$49,355 and female, full-time, year-round workers earn \$37,357. Combining to employ 33,498 residents, the top four employment sectors by the number of workers employed are:

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

Table 13 shows that there are limited jobs with living wages in the city for individuals who do not have a bachelor’s degree or above, which comprises much of the low-income population. Many currently growing sectors, which including aviation, shipbuilding and repair, advanced manufacturing, logistics, healthcare, engineering, construction, and business, require specialized education and skills.

*Table 13: Number of Workers by Business Sector*

<b>Business by Sector</b>	<b>Number of Workers</b>
Agriculture, Mining, Oil & Gas Extraction	572
Arts, Entertainment, Accommodations	8,972
Construction	4,738
Education and Health Care Services	21,002
Finance, Insurance, and Real Estate	4,853
Information	1,338
Manufacturing	7,925
Other Services	3,538
Professional, Scientific, Management Services	8,684
Public Administration	3,759
Retail Trade	9,809
Transportation and Warehousing	4,751
Wholesale Trade	1,727
<b>Total</b>	<b>81,668</b>

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

*Table 14: Earnings by Education Level*

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>	<b>Number of civilians employed</b>
Less than high school graduate	\$ 21,129	3,983
High school graduate (includes equivalency)	\$ 29,585	17,200
Some college or associate degree	\$ 32,299	19,836
Bachelor's degree	\$ 47,847	24,908
Graduate or professional degree	\$ 62,378	3,983

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates

## V. Housing

The following section reviews the supply, availability, and type of housing in Mobile, as well as key metrics on housing development in the city.

### Key Data and Insights:

- Housing production has remained fairly unchanged with an increase of about 700 units in the last decade.<sup>13</sup>
- The majority of Mobile’s housing stock is single-family detached housing followed by 5-19 unit apartment buildings.<sup>14</sup>
- Since 2018, Mobile has lost about 2,000 units in 2-4 unit structures while gaining about 3,000 units in 5-19-unit structures and about 1,000 units in 20 or more unit structures. At the same time, 1-unit, detached structures have remained fairly unchanged. This indicates that older “missing middle” housing is likely being demolished while large apartments are being built.
- Mobile’s housing stock built before 1980 is 42.2 percent.<sup>14</sup> Due to the age of the housing stock, there is likely a high need for lead mitigation for both rental and owner households.
- Roughly 36 percent of total households in Mobile experience at least one housing problem, as defined by the U.S. Department of Housing and Development.<sup>15</sup> Black, Hispanic, and Native American householders experience a higher rate of problems with over 40 percent of all households for each racial/ethnic group. Family households at 5+ people are most likely to experience housing problems. Of all Mobile households, 19.6 percent experience any of four severe housing problems, with Black and Hispanic households experiencing the highest rates of severe housing problems.<sup>15</sup>

### A. Overview of Housing Supply

According to the American Community Survey 5-Year estimates, the housing supply of Mobile increased from 89,347 units in 2012 to 92,883 in 2019. Between 2019 and 2021, the number of housing units in Mobile slightly decreased to 91,077 units. (Figure 5).

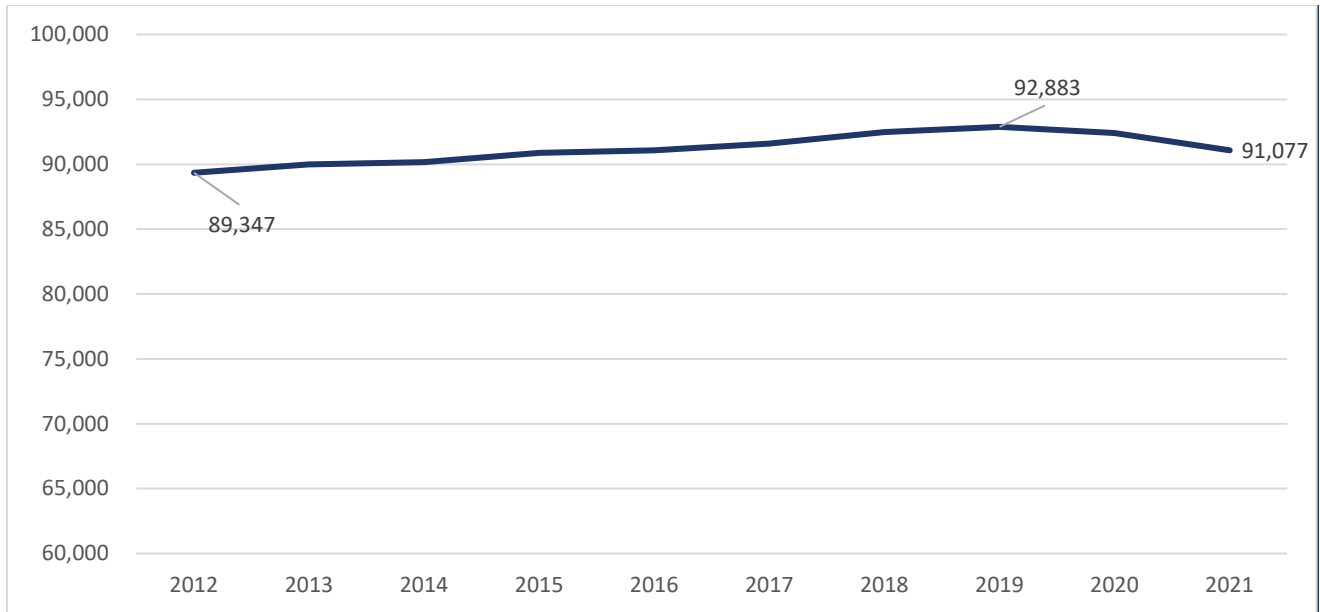
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<sup>13</sup> U.S. Census Bureau, 2008-2012, 2009-2013, 2010-2014, 2011-2015, 2012-2016, 2013-2017, 2014-2018, 2015-2019, 2016-202, 2017-2021 American Community Survey 5-Year Estimates.

<sup>14</sup> U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

<sup>15</sup> U.S. Department of Housing and Urban Development. Comprehensive Housing Affordability Strategy (CHAS) Background. Available at: [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)

Figure 5: Housing Units in Mobile Over Time



Source: U.S. Census Bureau, 2008-2012, 2009-2013, 2010-2014, 2011-2015, 2012-2016, 2013-2017, 2014-2018, 2015-2019, 2016-202, 2017-2021 American Community Survey 5-Year Estimates.

While the housing supply is majority 1-unit, detached housing units (68 percent), there is a significant portion of housing units that are part of buildings with 10 or more units (16.4 percent). Smaller apartment buildings, 2-to-9-units, make up 13.1 percent of the housing stock. Since the 2018 Consolidated Plan, Mobile has lost about 2,000 units in 2-4 unit structures while gaining about 3,000 units in 5-19 unit structures and about 1,000 units in 20 or more unit structures. At the same time, 1-unit, detached structures have remained fairly unchanged. This indicates that older “missing middle” housing is likely being demolished while large apartment buildings are being built. Missing Middle is a term used to describe the range of housing density between a “single-family detached home and a mid-rise apartment building” that was prevalent in the early twentieth century but has been made difficult to construct and maintain in most American cities due to private market demand and land use regulations that have evolved over time.<sup>16</sup>

Table 15: Types of Housing In Mobile, 2021

Total Housing Units	Number	Percent
1-unit, detached	61,934	68.0%
1-unit, attached	1,241	1.4%
2 units	1,692	1.9%

<sup>16</sup> Planetizen. “What is Missing Middle Housing?”. Available at: <https://www.planetizen.com/definition/missing-middle-housing>

Total Housing Units	Number	Percent
3 or 4 units	3,338	3.7%
5 to 9 units	6,808	7.5%
10 to 19 units	7,704	8.5%
20 or more units	7,198	7.9%
Mobile home	1,132	1.2%
Boat, RV, van, etc.	30	0.0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

### B. Age and Condition

With 43.2 percent of the city’s housing stock built before 1980, combined with responses from the stakeholder interviews, there is evidence to suggest that there is a need for structural rehabilitation with a focus on lead mitigation (Figure 6). Mobile has had a stagnating population combined with sizable enough housing growth that a 2019 housing production report listed Mobile as one of only 17.5 percent of 309 metros that was determined to have “adequately produced (housing) in 2012 (and) have continued to meet or exceed housing needs”.<sup>17</sup> This is unique amongst the majority of American metros which underproduced housing in the last decade. While Mobile may have an adequate number of available housing units, that does not guarantee that all units are livable or safe. In stakeholder interviews, multiple stakeholders noted disrepair, mold, and lack of weatherization improvements as issues in the available housing. They also noted that renters may not report the issues and homeowners may not have the funds or access to programs to remediate the issues. There are also multiple news reports of apartments with mold and lack of clarity around resources for tenants to repair and remediate the issues. It is unknown if tenants have access to viable steps that will allow repair and/or hazard remediation.<sup>18,19</sup>

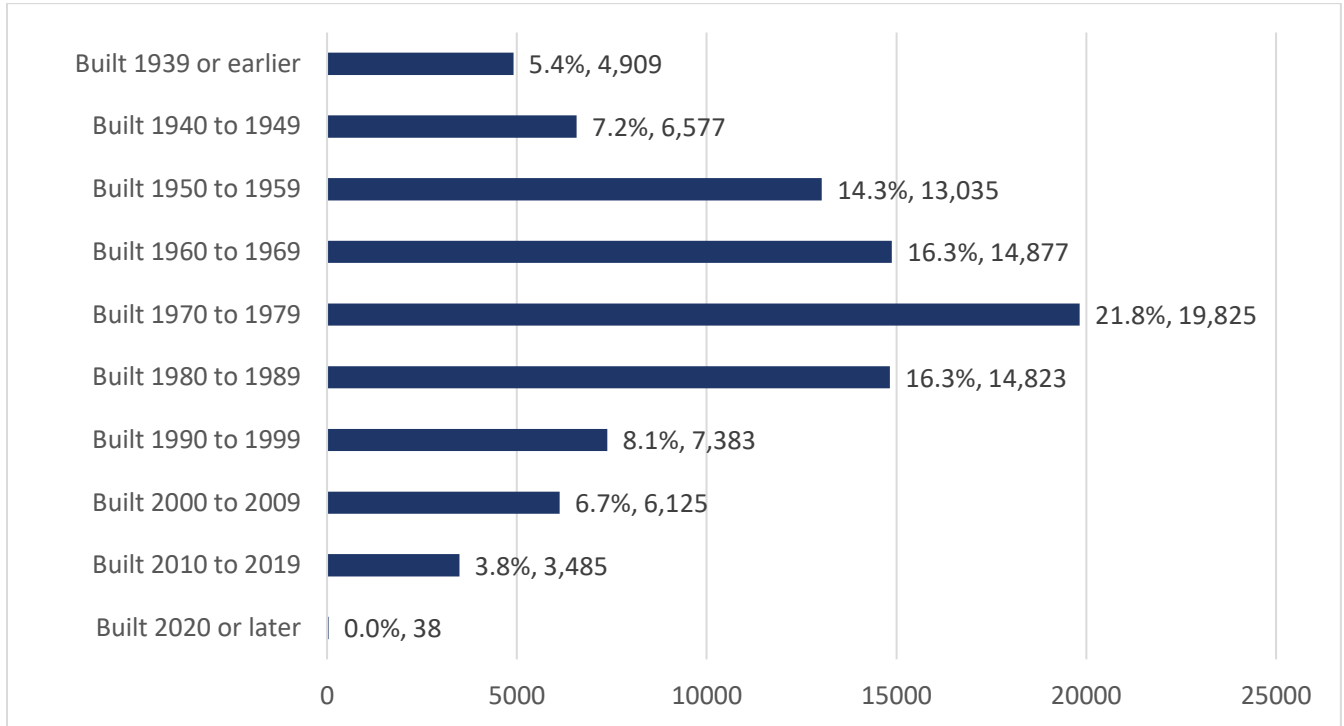
<sup>17</sup>Up for Growth (2022). 2022 Housing Underproduction in the U.S. Available at: <https://upforgrowth.org/apply-the-vision/housing-underproduction/>

<sup>18</sup> NBC15 News (2022). Student says mold problem at Central House Apartment has become health risk. Available at: <https://myNBC15.com/news/local/usa-student-says-mold-problem-at-central-house-apartment-has-become-health-risk>

<sup>19</sup> NBC15 News (2022). Reality Check report results in city inspection at Mobile apartment. Available at: <https://myNBC15.com/news/local/mold-dirty-water-leaks-mother-says-issues-have-persisted-for-months-at-local-townhome>



Figure 6: Age of Housing in Mobile, 2021



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

### C. Vacant Units

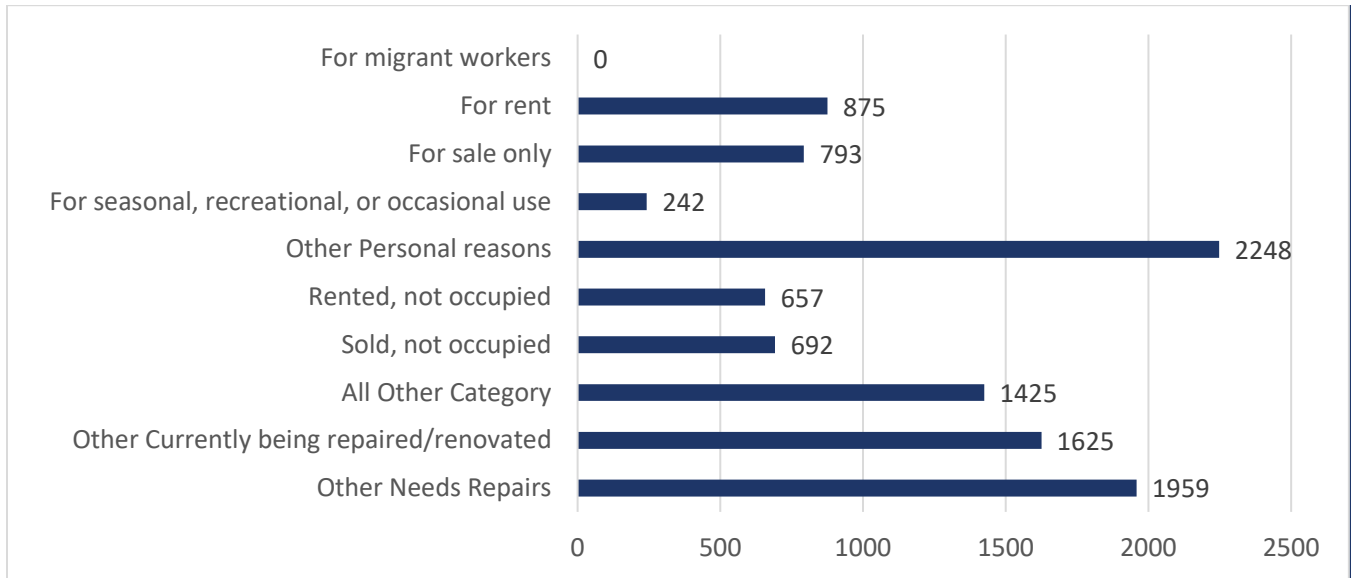
According to the Census, vacancies are defined as a point-in-time count of unoccupied units on April 1<sup>st</sup> of every year as either a sample or full inventory. As such, vacancies can include “unoccupied secondary homes and rentals, abandoned or foreclosed homes, seasonal migrants’ quarters, and investment properties, in addition to empty homes that are for sale”.<sup>20</sup> According to the American Community Survey 1-Year estimates for 2021 data, Mobile has 10,516 vacant units or 14.2 percent of all housing units. Figure 7 indicates why these vacancies may exist. The “Other” category of vacancies includes 2,248 for personal reasons, 1,959 for repairs needed, and 1,625 are currently being repaired or renovated. Only 84 were considered “abandoned possibly condemned”.<sup>21</sup>

<sup>20</sup> The New York Times (2022). “Vacant Homes Everywhere”. Available at:

<https://www.nytimes.com/2022/03/10/realestate/vacancy-rate-by-state.html>

<sup>21</sup> <https://data.census.gov/table?q=Mobile+City+vacancy&tid=ACSDT1Y2021.B25130>

Figure 7: Reasons for Vacancy, Mobile 2021



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

#### D. Tenure

The Census defines tenure by the conditions under which land or buildings are held or occupied, i.e., if a housing unit is renter-occupied, owner occupied, or vacant.<sup>22</sup> Around half of all Mobile residents rent their home; 51 percent of housing units in Mobile are owner-occupied while 49 percent are renter-occupied. When comparing renter rates by racial group, Native Hawaiian and Other Pacific Islander, White, and American Indian and Alaskan Native residents have a higher proportion of homeowners while Asian, Some other race, and Black or African American residents have a higher proportion of renters.

Table 16: Tenure by Race or Ethnicity 2021

	Owner	Renter
White	64.4%	35.6%
Black or African American	39.9%	60.1%
American Indian and Alaska Native	62.3%	37.7%
Asian	35.2%	64.8%
Native Hawaiian and Other Pacific Islander	100.0%	0.0%
Some other race	36.8%	63.2%
Two or more races	49.6%	50.4%
Hispanic or Latino origin	46.9%	53.1%

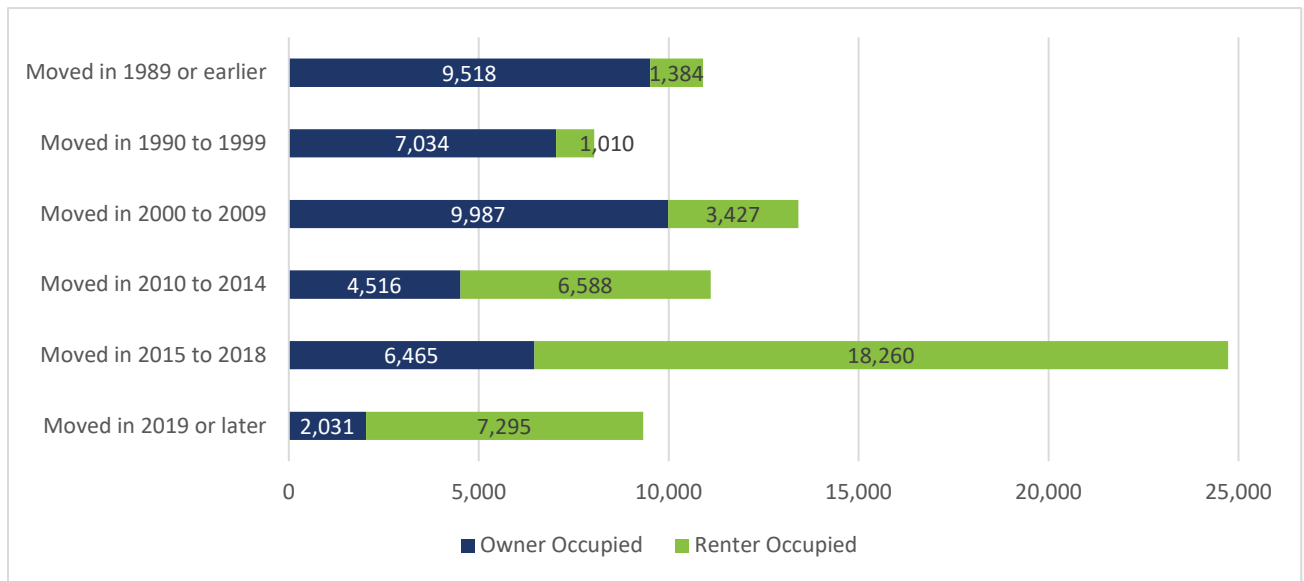
<sup>22</sup> U.S. Census. Definitions and Explanations. Available at: <https://www.census.gov/housing/hvs/definitions.pdf>

	Owner	Renter
White alone, not Hispanic or Latino	64.7%	35.3%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

As of 2021, 40 percent of renters had lived in their home since 2018 or earlier.

Figure 8: Tenure Based on Move-In Year Date



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

### E. Housing Affordability

Comprehensive Housing Affordability Strategy (CHAS) data provides insight on housing problems. Each year, HUD receives custom tabulations of ACS data from the U.S. Census Bureau to develop the CHAS data set which is then used by communities and researchers to analyze the extent of housing problems and housing needs, particularly for low-income households.”<sup>23</sup>

Using HUD median income calculations and 2015-2019 CHAS data, there are currently 5,410 rental units available for households earning 30 percent of the area median income and 12,945 households earning 0 – 30 percent of the area median income.<sup>24</sup> At 30-50 percent of the HUD Area Median Family Income (HAMFI), which is the median family income calculated by HUD, there are 10,810 households and 11,375 rental units affordable to households earning 50 percent HAMFI.<sup>25</sup> There are 48,634 affordable rental and owner-occupied units available for households earning at least 80 percent median income. There are 41,590 households in Mobile earning at least 80 percent area median income. This data reveals that

<sup>23</sup> U.S. Department of Housing and Urban Development. Comprehensive Housing Affordability Strategy (CHAS). Available at: <https://www.huduser.gov/PORTAL/datasets/cp.html>

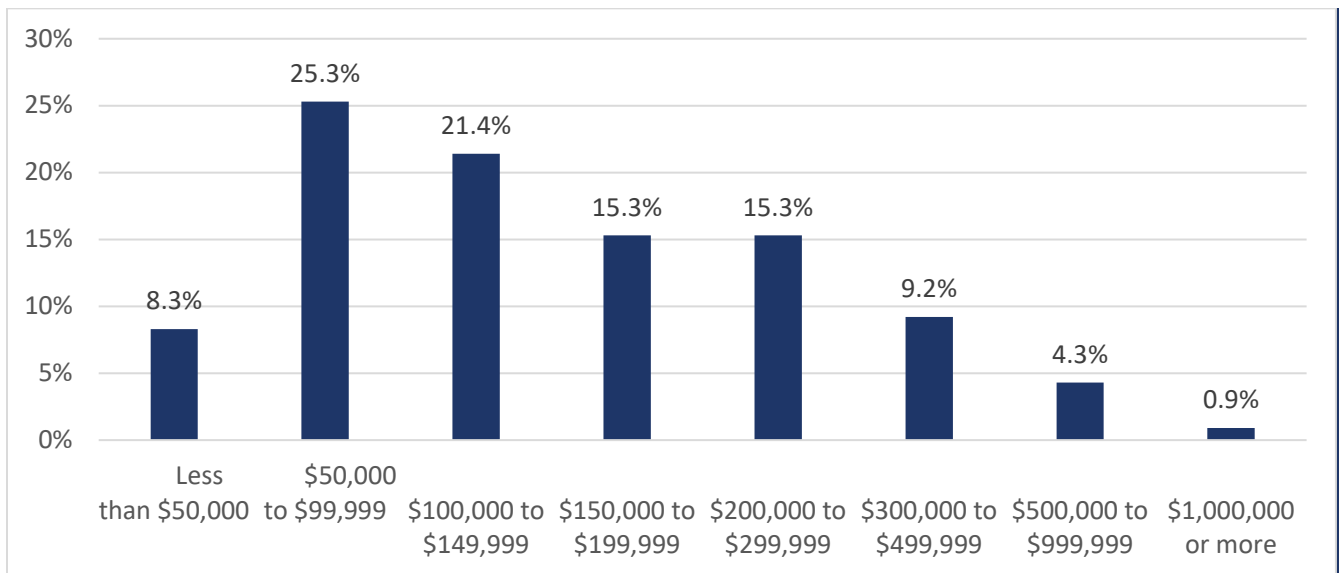
<sup>24</sup> U.S. Department of Housing and Urban Development. Consolidated Planning/CHAS Data. Available at: <https://www.huduser.gov/PORTAL/datasets/cp.html>.

<sup>25</sup> U.S. Department of Housing and Urban Development. CHAS: Background. Available at: [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html).

there are rental and owner-occupied units at the top of the income range but an undersupply of affordable housing units for households earning.

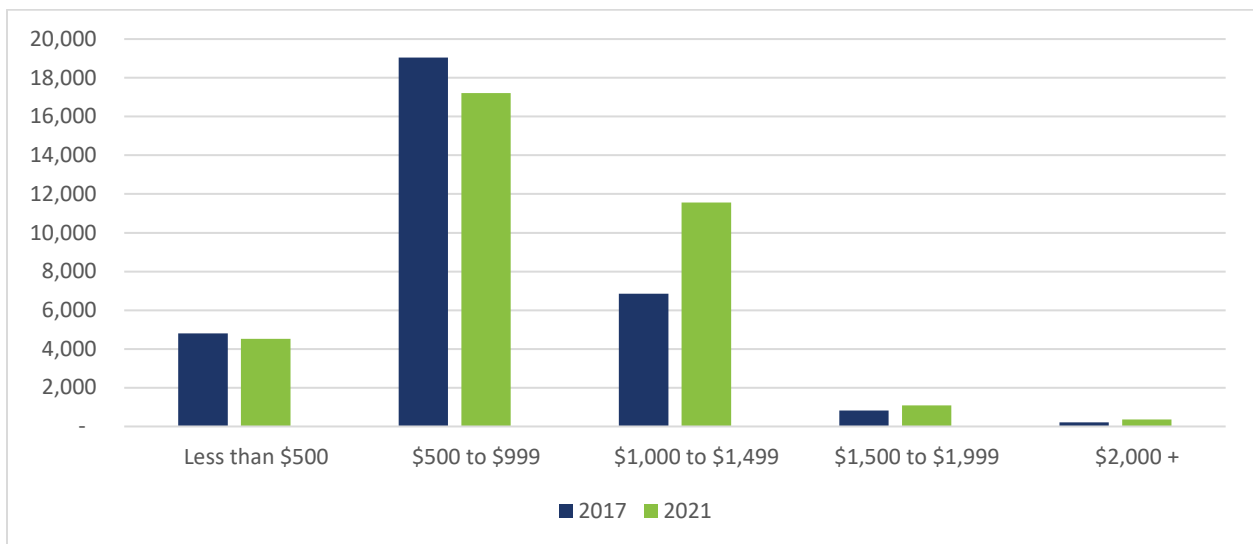
Figure 9 shows that median value of an owner-occupied home in Mobile is \$138,400 according to the 2021 5-Year ACS data. Of these homes, the largest plurality is the 25 percent of homes between \$50,000 and \$99,000. About 15 percent of homes in the city are valued at more than \$300,000. Figure 10 shows that rental prices have increased over time with the largest increase in units that are \$1,000 to \$1,499. Table 17 shows that both home value and contract rent has increased proportionally, with home value increasing 14.6 percent and contract rent increasing 13.1 percent in the past five years.

Figure 9: City of Mobile Owner-Occupied Unit Value 2021



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.

Figure 10: Change in Rent Prices Over Time



Source: U.S. Census Bureau, 2013 – 2017 & 2017-2021 American Community Survey 5-Year Estimates.

Table 17: Change in Rent and Housing Price Over Time

	Base Year: 2017	Most Recent Year: 2021	Percent Change
Median Home Value	\$120,800	\$138,400	14.6%
Median Contract Rent	\$812	\$918	13.1%

Source: U.S. Census Bureau, 2013 – 2017 & 2017-2021 American Community Survey 5-Year Estimates.

#### F. Cost Burden

HUD defines cost burdened as spending more than 30 percent of household income on housing and "severely cost burdened" as spending more than 50 percent of household income on housing. Table 18 shows that in Mobile, there are 21,395 renter households earning less than 80 percent AMI, and 15,560 (73 percent) of those households spend at least 30 percent on housing costs each month. Small, related households make up 33 percent of all cost burdened households earning 80 percent or less AMI, while the "Other" category makes up 37 percent. The Other category consists of single person households and households that are comprised of unrelated individuals living together. At the same time, there are 6,330 cost burdened owner households earning less than 80 percent AMI, 43.8 percent of which are elderly households, or those 1-2 person households with either person age 62 or over (Table 18).

Table 19 shows that there are currently 9,045 renter households that are severely cost burdened; meaning, these households pay 50 percent or more of their income on housing costs. There are 3,245 owner-occupied households that are severely cost burdened, also disproportionately consisting of households headed by elderly householders.

Table 18: Cost Burden More than 30% by Household Type and Tenure

	Renter				Owner			
	0-30% AMI	30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,165	1,810	1,305	5,280	375	660	815	1,850
Large Related	620	190	120	930	55	85	35	175
Elderly	980	1,000	745	2,725	965	985	825	2,775
Other	2,660	2,330	1,635	6,625	595	340	595	1,530
Total need by income	6,425	5,330	3,805	15,560	1,990	2,070	2,270	6,330

Source: HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

Table 19: Cost Burden More than 50% by Household Type and Tenure

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,930	930	110	2,970	290	345	75	710
Large Related	585	105	0	690	55	45	0	100

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	790	605	150	1,545	700	605	225	1,530
Other	2,225	1,225	390	3,840	480	215	230	925
Total need by income	5,530	2,865	650	9,045	1,525	1,210	530	3,265

Source: HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

The following table shows the severe cost burden by race or ethnicity. Black, Non-Hispanic households experienced the highest level of severe cost burden (18.3 percent) followed by Asian or Pacific Islander (16.4 percent), Other Non-Hispanic (15.9 percent), and Hispanic (15.4 percent).

Table 20: Cost Burden More than 50% of Mobile CDBG Jurisdiction

Households with Severe Housing Cost Burden	(Mobile County, AL CDBG) Jurisdiction		
	Race/Ethnicity	Number with severe cost burden	Number households
White, Non-Hispanic	5,264	56,484	9.3%
Black, Non-Hispanic	2,953	16,150	18.3%
Hispanic	233	1,509	15.4%
Asian or Pacific Islander, Non-Hispanic	245	1,493	16.4%
Native American, Non-Hispanic	78	866	9.0%
Other, Non-Hispanic	159	1,000	15.9%
Total	8,932	77,495	11.5%
<b>Household Type and Size</b>			
Family households, <5 people	5,207	50,508	10.3%
Family households, 5+ people	572	7,340	7.8%
Non-family households	3,127	19,633	15.9%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

### G. Housing Problems

According to the CHAS dataset, “there are four main housing problems tracked by the data:

- 1) housing unit lacks complete kitchen facilities;

- 2) housing unit lacks complete plumbing facilities;
- 3) household is overcrowded; and
- 4) household is cost burdened.

A household is said to have a housing problem if they have any 1 or more of these 4 problems.”<sup>26</sup>

Roughly 36 percent of total households in Mobile experience at least one housing problem. Black, Hispanic, and Native American householders experience a higher rate of problems with over 40 percent of all households for each racial/ethnic group. Family households with over 5 people are most likely to experience housing problems. 19.6 percent of all Mobile households experience any of four severe housing problems, with Black and Hispanic households experiencing the disproportionately highest rates of housing problems.

Table 21: Housing Problems among Race/Ethnicity and Household Type and Size

Households experiencing any of 4 housing problems	Number with problems	Number households	Percent with problems
<b>Race/Ethnicity</b>			
White, Non-Hispanic	9,870	36,480	27.1%
Black, Non-Hispanic	16,255	35,759	45.5%
Hispanic	870	1,910	45.6%
Asian or Pacific Islander, Non-Hispanic	315	1,154	27.3%
Native American, Non-Hispanic	74	165	44.9%
Other, Non-Hispanic	170	712	23.9%
Total	27,560	76,220	36.2%
<b>Household Type and Size</b>			
Family households, <5 people	12,535	39,704	31.6%
Family households, 5+ people	2,095	4,888	42.9%
Non-family households	12,925	31,620	40.9%
<b>Households experiencing any of 4 Severe Housing Problems</b>			
<b>Race/Ethnicity</b>			
White, Non-Hispanic	5,134	36,480	14.1%
Black, Non-Hispanic	9,040	35,759	25.3%
Hispanic	465	1,910	24.4%
Asian or Pacific Islander, Non-Hispanic	168	1,154	14.6%
Native American, Non-Hispanic	20	165	12.1%
Other, Non-Hispanic	123	712	17.3%
Total	14,955	76,220	19.6%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

<sup>26</sup> U.S. Department of Housing and Urban Development. Comprehensive Housing Affordability Strategy (CHAS) Background. Available at: [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)

## VI. Equity

The following section reviews geographic measures of equity and access to opportunity in Mobile. This section outlines measures of segregation, including racially and ethnically concentrated areas of poverty (R/ECAP).

### Key Data and Insights:

- The racial/ethnically dissimilarity index shows that segregation decreased from 1990 to 2010 but has increased from 2010 to 2020.<sup>27</sup>
- The access to opportunity index<sup>28</sup> reveals that Black or African American residents have the worst school opportunity and exposure to environmental health hazards, while all racial groups had low scores for transit access and transportation costs.
- R/ECAPs in Mobile have a racial composition of 88.8 percent Black, Non-Hispanic and are half families with children.
- While many of the R/ECAPs are close to community amenities and jobs in downtown, limited public transportation makes connectivity difficult to regional opportunities and employment in other areas of Mobile.
- Many of the R/ECAPs in Mobile have high flood risk.
- R/ECAPs follow historic redlining that determined government investment, homeownership, and other types of racial equity by neighborhood.

### A. Racial/Ethnic Dissimilarity

The racial/ethnic dissimilarity index is a measure of geographic segregation wherein 0 is complete integration and 100 is complete segregation. The dissimilarity index “measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group”.<sup>29</sup> Since 1990, the segregation of Mobile neighborhoods decreased until 2010 and then increased between every non-white racial group compared to white racial group in 2020. The segregation between Black and White Mobile residents is the highest measure of segregation, while the segregation between Hispanic and White is the lowest measure.

Table 22: Racial/Ethnic Dissimilarity Index Over Time

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	2020 Trend
Non-White/White	64.88	56.06	49.4	52.98
Black/White	68.27	59.61	53.13	56.26
Hispanic/White	22.4	27.8	31.12	33.53
Asian or Pacific Islander/White	42.02	36.41	32.71	36.53

Source: AFFHT Tool 2020 Data Decennial Census, ACS

<sup>27</sup> Census Scope, About Dissimilarity Indices. Available at: [https://censusscope.org/about\\_dissimilarity.html](https://censusscope.org/about_dissimilarity.html)

<sup>28</sup> AFFHT Tool 2020 Data Decennial Census & ACS.

<sup>29</sup> Census Scope, About Dissimilarity Indices. Available at: [https://censusscope.org/about\\_dissimilarity.html](https://censusscope.org/about_dissimilarity.html)



## B. Access to Opportunity

The following access to opportunity indices are measured by HUD's Affirmatively Furthering Fair Housing Tool (AFFHT) measure the differences in opportunity according to each of the below factors by race or ethnicity.

- **Poverty** - The low poverty index captures poverty in each neighborhood based on poverty rate. For this index the higher the score, the less exposure to poverty. For this measure, White, Non-Hispanic residents had the lowest exposure to poverty, and Black, Non-Hispanic residents had the highest exposure to poverty.
- **Schools** - The school proficiency index uses school-level data on the performance of 4<sup>th</sup> grade students on state exams. The index is a function of 4<sup>th</sup> grade students proficient in reading and math scores for up to three schools within 3 miles of the block group centroid. For this measure, higher scores represent higher test scores. For this measure, Asian or Pacific Islander, Non-Hispanic residents had the highest index while Black, Non-Hispanic residents had the lowest index.
- **Labor Market** - The labor market index is a summary description of the relative intensity of labor market engagement and human capital based on employment, labor force participation, and educational attainment. For this measure, higher scores represent higher labor force participation and human capital.
- **Public Transit** - The transit index is a measure of estimated transit trips taken by a hypothetical 3-person single-parent family with income at 50 percent of the median income for renters for the region. For this measure, the higher the value, the more likely households are to utilize public transit. In Mobile, Native American, Non-Hispanic and Black, Non-Hispanic residents are most likely to utilize transit.
- **Transportation Cost** - The low transportation cost index is a measure for a hypothetical 3-person single-parent family with income at 50 percent of the median income for renters in the region. For this measure, the higher the value, the lower the cost of transportation in the neighborhood. This could be due to access to public transportation, density, and connectivity to jobs. For this measure, every racial group has a low score.
- **Job Proximity** - The job proximity index quantifies the accessibility of a given residential neighborhood to job locations, with larger employment centers weighted more heavily. For this index, higher scores represent better access to employment opportunities. For this measure, most groups had lower scores except for Native American, Non-Hispanic residents which had a 52 score.
- **Environmental Health** - The environmental health index is a measure of the potential exposure to harmful toxins for a neighborhood that combines measures for air quality carcinogenic, respiratory, and neurological hazards. For this measure, the higher the value, the better the environmental quality of a neighborhood. For this measure, most racial groups had low indices with Black, Non-Hispanic residents and Native American, Non-Hispanic residents having the most exposure to harmful toxins.

Table 23: Access to Opportunity Indices by Race/Ethnicity

Mobile County, AL CDBG - Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
White, Non-Hispanic	51.3	65.6	35.8	15.9	10.8	20.9	22.1
Black, Non-Hispanic	29.7	46.7	21.7	24.0	16.2	31.3	15.7
Hispanic	47.3	67	34.3	15.1	12.2	23.7	21.8
Asian or Pacific Islander, Non-Hispanic	44.3	69.4	36.7	14.2	11.1	23.9	28.9
Native American, Non- Hispanic	35.9	54.2	21.6	29.4	10.8	52	15.8

Source: AFFHT Tool 2020 Data Decennial Census & ACS

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

HUD defines Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) as both a racial/ethnic concentration threshold of 50 percent or more and a poverty threshold of 40 percent or more individuals living at or below poverty line by census tract.<sup>30</sup> In 2020 there were 18 R/ECAPs in the county and 12 R/ECAPs located within the City of Mobile. As shown in the tables below, R/ECAPs in Mobile are 88.8 percent Black, Non-Hispanic and almost half occupied by families.

Table 24: R/ECAP Race and Ethnicity

R/ECAP Race/Ethnicity	Number	Percent
Total Population in R/ECAPs	25,909	-
White, Non-Hispanic	2,100	8.1%
Black, Non-Hispanic	23,011	88.8%
Hispanic	308	1.2%
Asian or Pacific Islander, Non-Hispanic	201	0.8%
Native American, Non-Hispanic	34	0.1%
Other, Non-Hispanic	9	0.0%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

<sup>30</sup> U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). Available at: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps>

Table 25: R/ECAP Family Type

R/ECAP Family Type	Number	Percent
Total Families in R/ECAPs	6,053	-
Families with children	3,022	49.9%

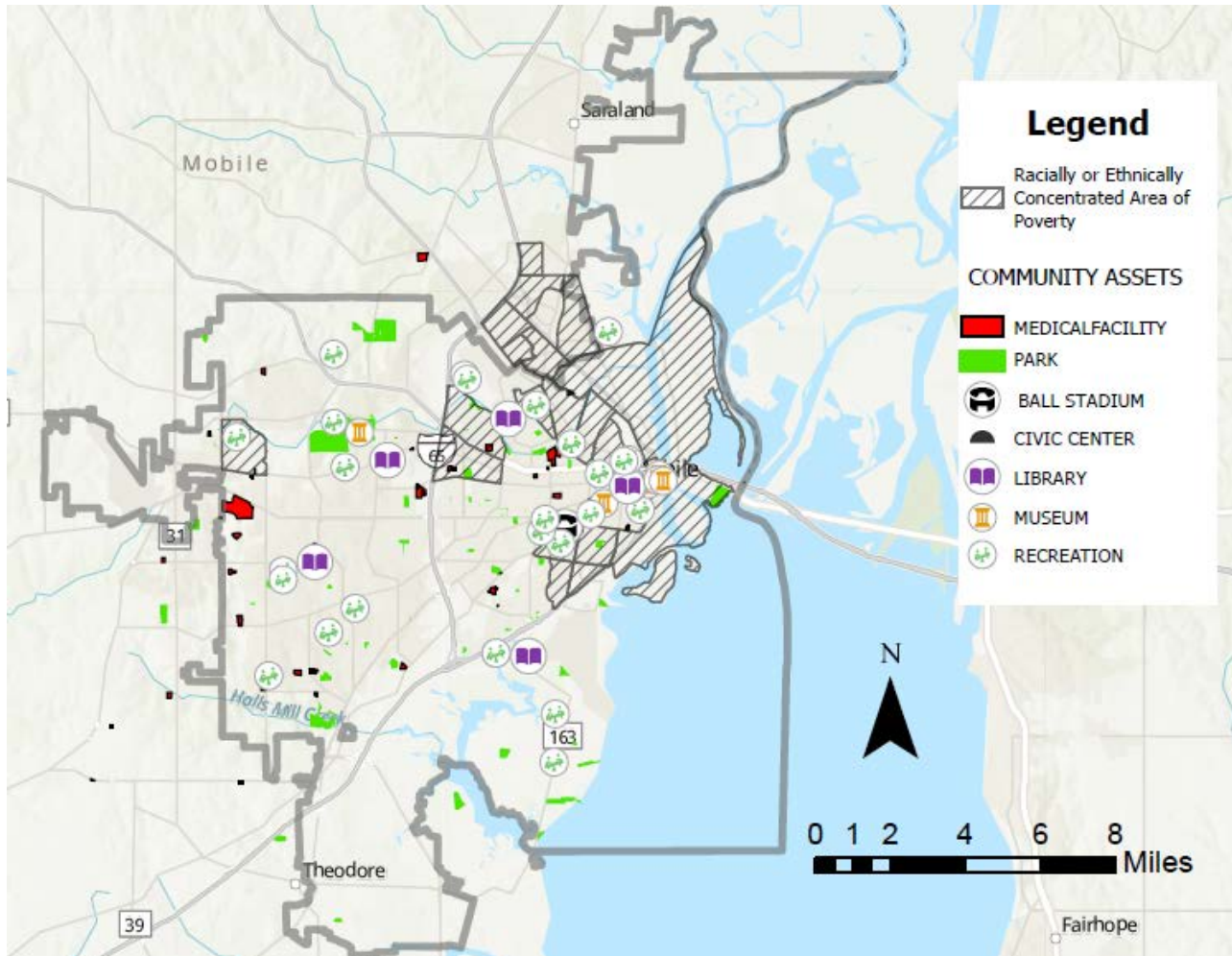
Source: AFFHT Tool 2020 Data Decennial Census, ACS

Much of the industrial zoning is located either in the City’s R/ECAPs or adjacent to the east, which may increase the exposure to environmental stressors and degradation. The neighborhoods towards the east of the City are also the most susceptible to flooding and storm damage. These vulnerable neighborhoods limit the available of safe and accessible fair housing in the city.

Further, connectivity issues in the R/ECAPs create challenges for residents to access employment centers, healthcare, and other community assets. Many of the R/ECAPs in Mobile surround the downtown, but some are separated by I-10 which may result in connectivity issues. The below map shows that most medical facilities, parks, libraries, and other forms of recreation are located on the west side of many R/ECAPs, and some neighborhoods may have limited access to community amenities. While public transportation is very limited in Mobile, the neighborhoods east of Highway 65 are better served than many neighborhoods throughout the city.

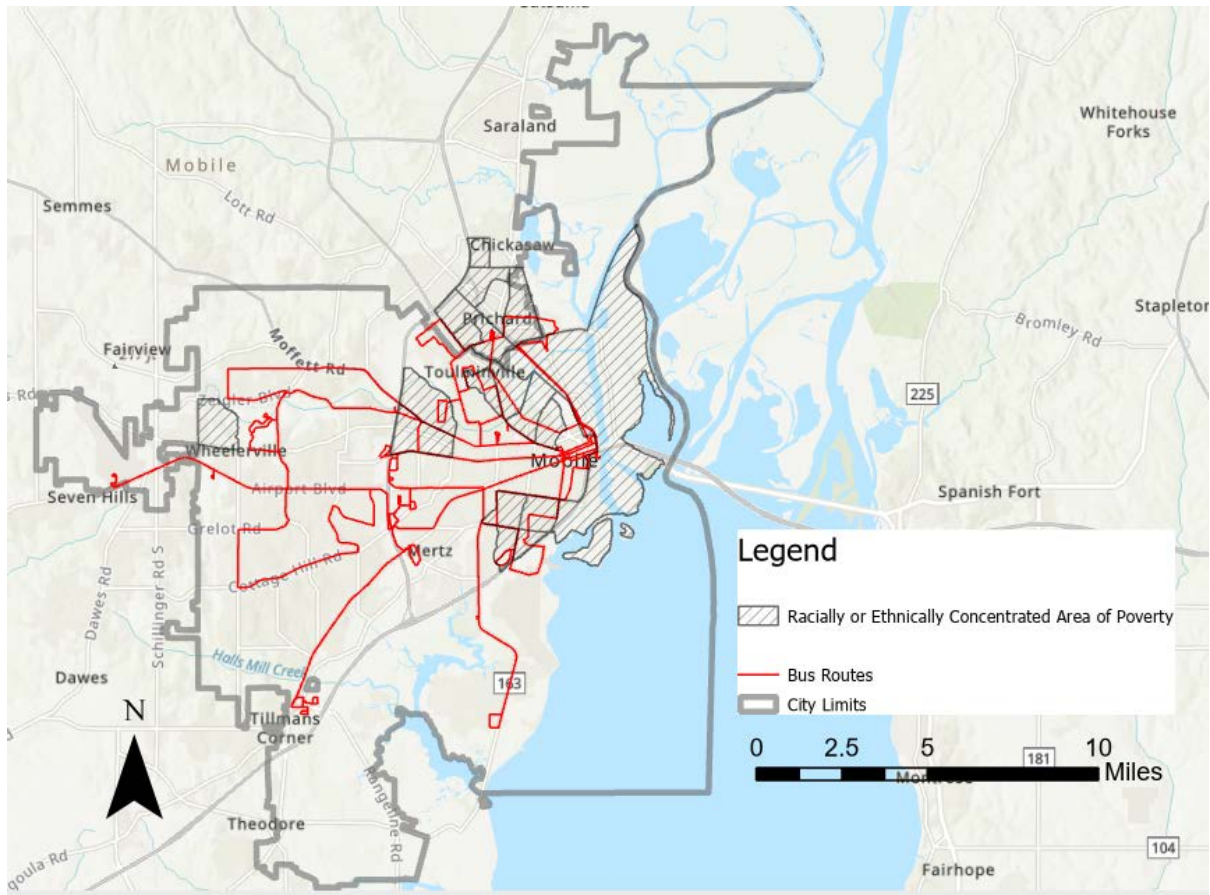
Mobile is in the process of creating accessible community amenities to these areas. Plans are currently underway to create a 98-acre waterfront park along Mobile Bay which will add needed park space to the east side of the city.

Figure 11: Map of Community Assets and R/ECAPs



Source: City of Mobile Open GIS Data, available at: <https://open-government-cityofmobile.hub.arcgis.com/> and HUD Open GIS Data, available at: <https://hudgis-hud.opendata.arcgis.com/maps/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>

Figure 12: Public Transit and R/ECAPs



Source: City of Mobile Open GIS Data, available at: <https://open-government-cityofmobile.hub.arcgis.com/> and HUD Open GIS Data, available at: <https://hudgis-hud.opendata.arcgis.com/maps/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>

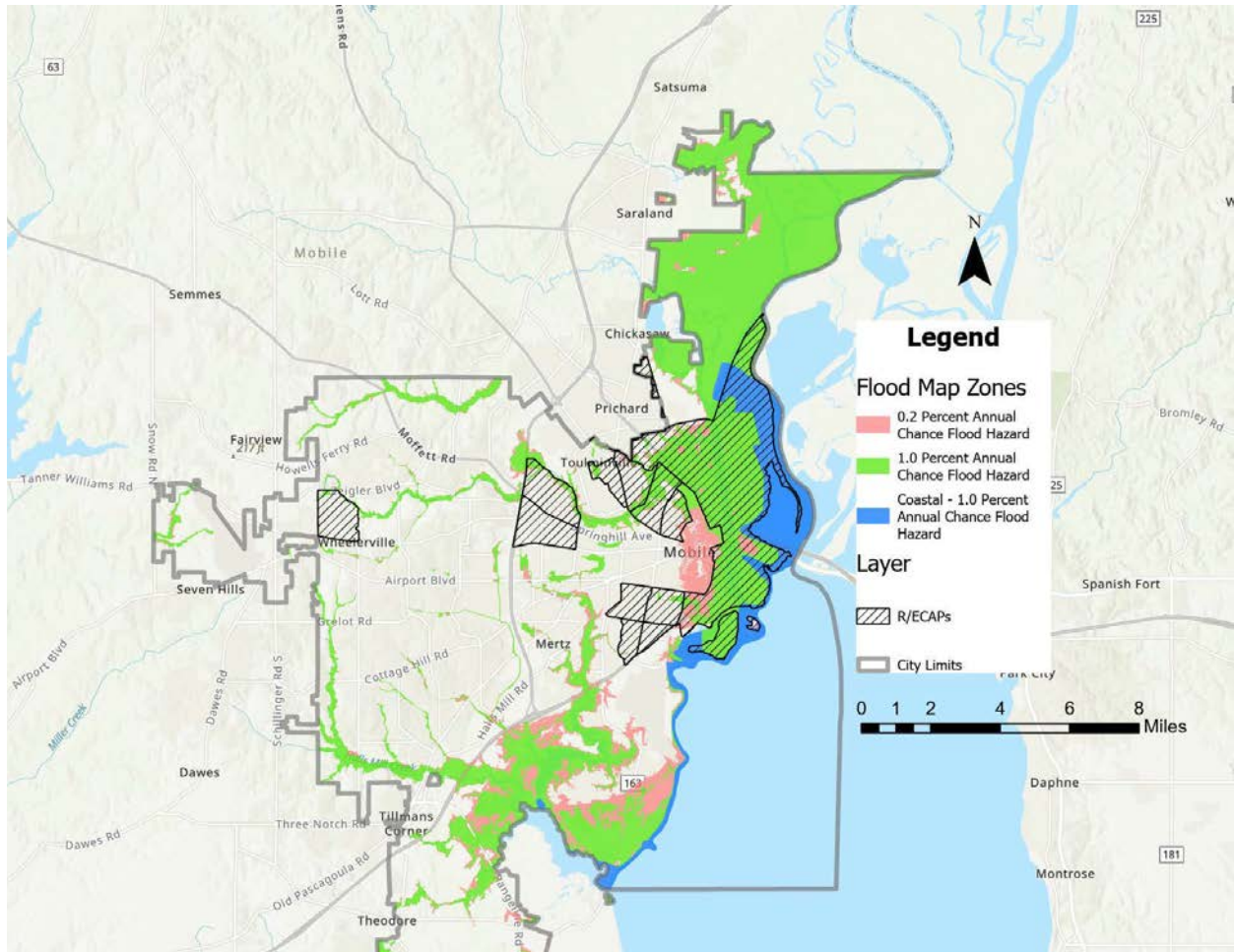
## 1. Natural Hazards Risk

The City of Mobile is a coastal city, making it vulnerable to sea level rise and susceptible to extreme weather events, including most recently Hurricanes Sally and Zeta. The U.S. Global Change Research Program has established possible future flood depths in Mobile, AL with rising sea level.<sup>31</sup> The areas that are most likely to be impacted by rising sea levels include several of the most economically vulnerable neighborhoods in Mobile. The majority of low-and moderate-income neighborhoods are near Mobile Bay and a network of waterways that feed into the bay. The map below shows that many of the areas of highest flood risk overlap with Racially and Ethnically Concentrated Areas of Poverty (R/ECAPS).

<sup>31</sup> Globalchange.gov, Possible Future Flood Depths in Mobile, AL with Rising Sea Level, available at: <https://www.globalchange.gov/browse/multimedia/possible-future-flood-depths-mobile-al-rising-sea-level>



Figure 13: Mobile FEMA Flood Map



Source: City of Mobile Open GIS Data, available at: <https://open-government-cityofmobile.hub.arcgis.com/> and HUD Open GIS Data, available at: <https://hudgis-hud.opendata.arcgis.com/maps/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>

#### D. Historic Redlining in Mobile

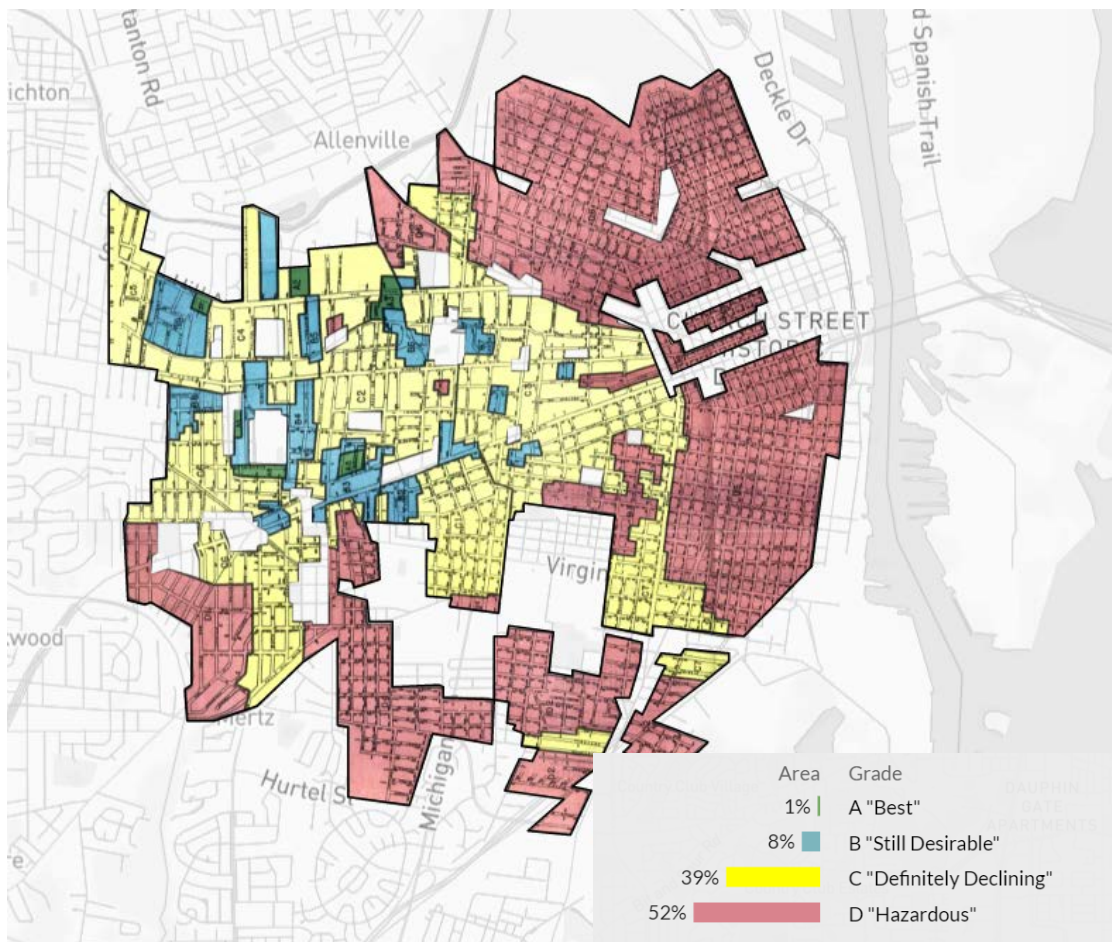
Historic redlining was the twentieth century process of systemically scoring and disinvesting in nonwhite neighborhoods in the cities around the United States. While redlining was made illegal with the 1968 Fair Housing Act, the many decades in which residents could not obtain loans, buy houses, invest in their neighborhood, or access public services coupled with the lack of government provision has a lingering effect on cities that is apparent in health outcomes, environmental hazards, access to opportunity, etc. today.<sup>32</sup>

In the 1920s, the Federal Housing Administration was created with the stated purpose of aiding Americans in attaining homeownership. The FHA provided low interest loans to potential homebuyers.

<sup>32</sup> CBS News (2020). Redlining was outlawed in 1968. Here's how the practice is still hurting Black Americans. Available at: <https://www.cbsnews.com/news/wealth-gap-black-americans-redlining/>

They contracted the Homeowners’ Loan Corporation (HOLC) to create maps of their financial markets to determine neighborhood by neighborhood “riskiness” of the loans. This riskiness was oftentimes determined by the racial makeup of the neighborhood, with greater integration being counted negatively towards the “hazardous” condition of the neighborhood. The process of deeming a neighborhood “hazardous” led to the neighborhood being redlined – colored in red as shown in the map below. This grading system made it difficult for Black and other nonwhite residents to get loans to buy homes and has resulted in decades of disparate generational wealth. Additionally, redlined neighborhoods often suffered historic disinvestment of public resources in education, parks, streetscaping, transit, housing, etc.<sup>33</sup> Figure 15 illustrates that many of the “hazardous” grade neighborhoods are R/ECAPs today.

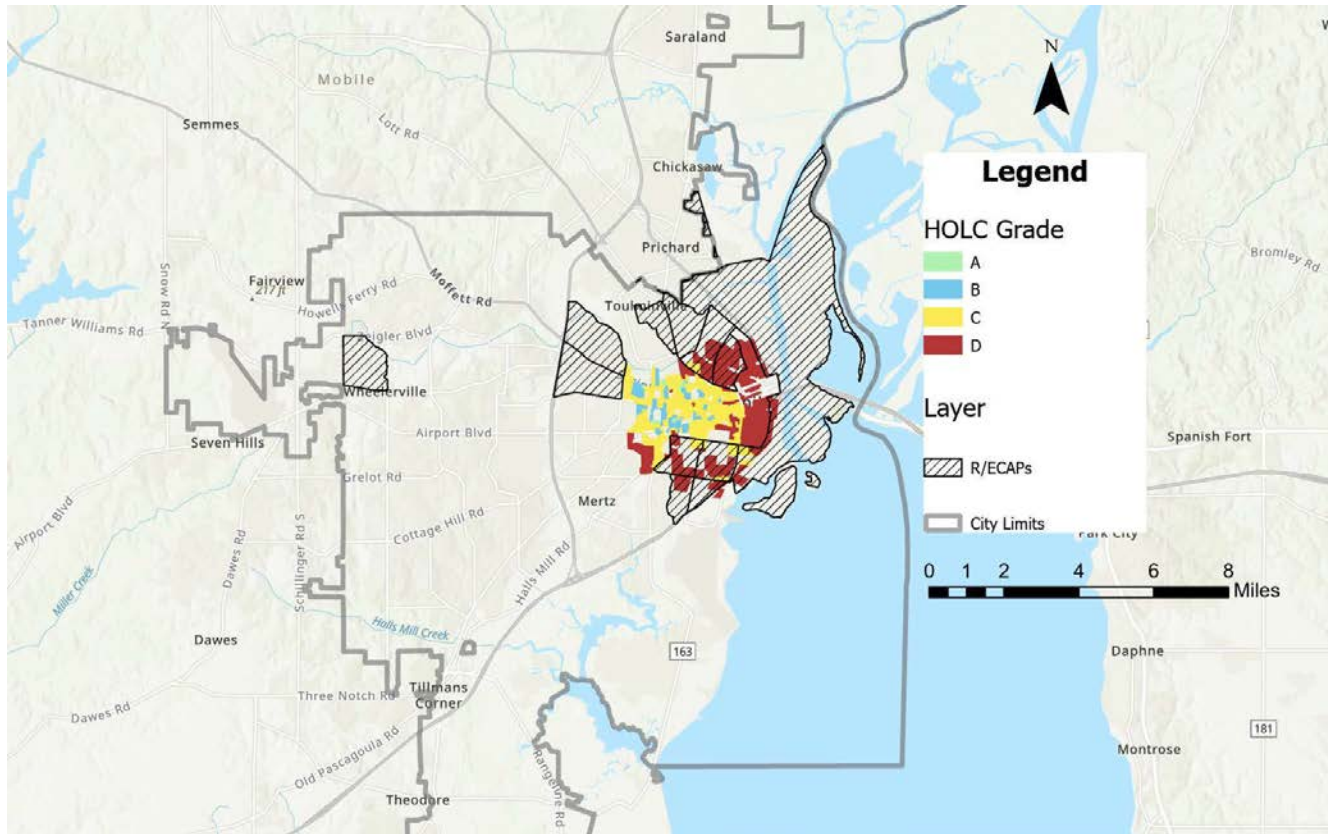
Figure 14: Historic Redlining Map



Source: University of Richmond Mapping Inequality, Available at: <https://dsl.richmond.edu/panorama/redlining/#loc=5/39.1/-94.58>

<sup>33</sup> Gregory D. Squires, Ruthanne Dewolfe and Alan S. Dewolfe (1979). “Urban Decline or Disinvestment: Uneven Development, Redlining and the Role of the Insurance Industry”. <https://www.jstor.org/stable/800018>

Figure 15: Current R/ECAPs and Historic Redlining



Source: University of Richmond Mapping Inequality, Available at: <https://dsl.richmond.edu/panorama/redlining/#loc=5/39.1/-94.58> and HUD Open GIS Data, available at: <https://hudgis-hud.opendata.arcgis.com/maps/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>

## VII. Environmental and Health Indicators

Poor housing quality and aging housing stock can contribute to environmental exposures that have a negative impact on health. Further, low-income neighborhoods and communities of color are more likely to be situated near environmentally hazardous sites or areas of poor air quality. This section discusses those environmental health issues and their connection to fair housing.

### Key Data and Insights:

- Many of the central neighborhoods of Mobile are in the 90<sup>th</sup> and above percentile for lead paint concentration in the country.<sup>34</sup>
- Mobile is in the 80-90<sup>th</sup> percentile for diesel particulate matter in the U.S.<sup>34</sup>
- Mobile is in the 80-90<sup>th</sup> percentile for cancer risk in the U.S.<sup>34</sup>
- Mobile is in the 90-95<sup>th</sup> percentile for the air toxics respiratory hazard index in the U.S.<sup>34</sup>

<sup>34</sup> EPA. Environmental Justice Screen. Available at: [https://ejscreen.epa.gov/mapper/ejscreen\\_SOE.aspx](https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx) pulled on 1/22/2023



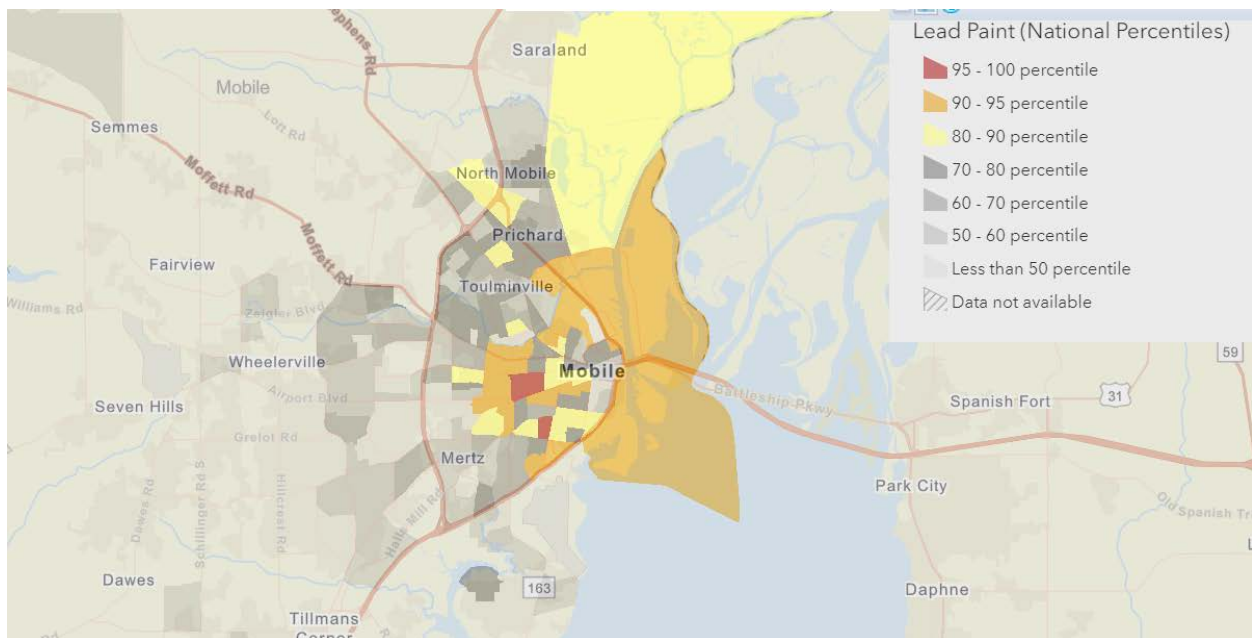
- Mobile is in the 90<sup>th</sup> percentile for wastewater discharge by toxicity weighted concentration/m distance in the US.<sup>34</sup>

#### A. Lead

Lead remediation is also a central concern in the city due to the aging housing stock. The below map from the EPA’s Environmental Justice Screening Tool shows that many of the central neighborhoods of Mobile are in the 90<sup>th</sup> and above percentile for lead paint concentration in the country.

Besides lead in paint and housing construction, there also is concern over lead in the water and sewer system as overseen by Mobile Area Water & Sewer System (MAWSS). In 2016, local news released a report of lead found in eight county-wide water systems for the past three years in routine testing. The Engineering Manager for MAWSS stated in normal annual maintenance, they “typically find 10 out of every 50 goosenecks dug up is made with lead.” Mobile Area Water & Sewer System (MAWSS) treats the water with anti-corrosive to halt the potential lead leech<sup>35</sup> and in 2021 began efforts to comprehensively test 90,000 lines of water service pipes for lead.<sup>36</sup> The pilot program began with 280 homes in the Campground Community.<sup>37</sup>

Figure 16: Lead Paint Concentration Percentiles, Mobile



Source: EPA EJ Screen (2023)

<sup>35</sup> FOX10 News (2016). FOX10 News Investigation find incidents of lead in local water. Available at: <https://www.fox10tv.com/2016/11/24/fox10-news-investigation-finds-incidents-lead-local-water/>

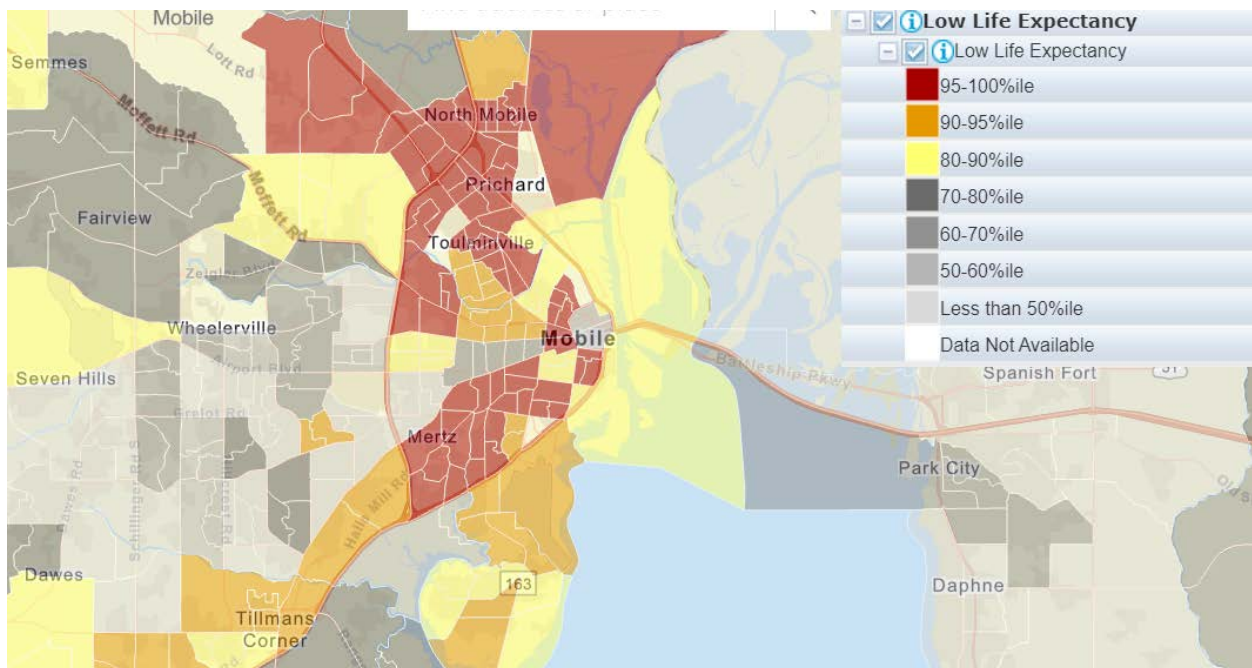
<sup>36</sup> Fox10 News (2021). MAWSS will test 90,000 customers’ water services pipes for lead. Available at: <https://myNBC15.com/news/local/mawss-will-test-90000-customers-water-service-pipes-for-lead>

<sup>37</sup> Mobile Area Water & Sewer System (2021). Press Release for Water Meter Service Line Material Identification Pilot Program. Available at : <https://www.mawss.com/uploads/lead-copper-rule-pilot-program-begins.pdf>

## B. Health Indicators

The map below indicates that many of the central neighborhoods in Mobile are in the 90<sup>th</sup> percentile or above for low life expectancy.<sup>38</sup> From a Centers for Disease Control and Prevention survey, 20.8 percent of adults in Mobile have a fair or poor self-rated health status.<sup>39</sup> Among adults in Mobile, 41.3 percent have high blood pressure, 34.5 percent of those who have been screened in the past five years have high cholesterol, and 10.6 percent have asthma.<sup>39</sup> Additionally, 18.2 percent of adults in Mobile currently lack health insurance.<sup>39</sup> These chronic health concerns can be exacerbated by environmental factors, such as particulate matter. Particulate matter has been linked to a variety of health conditions, including asthma, respiratory symptoms, nonfatal heart attacks, and premature death in people with heart or lung disease.<sup>40</sup>

Figure 17: Low Life Expectancy Percentiles, Mobile



Source: EPA EJ Screen (2023)

## C. Other Environmental Indicators

In looking at environmental indicators of pollution, degradation, or other health hazards, Mobile is in the top percentile in a few key indicators: Mobile is 80-90<sup>th</sup> percentile in diesel particulate matter, 80-

<sup>38</sup> EPA. Environmental Justice Screening and Mapping Tool. Available at: <https://ejscreen.epa.gov/mapper/>.

<sup>39</sup> Centers for Disease Control and Prevention. PLACES: Local Data for Better Health, Place Data, 2022 release. Available at: <https://chronicdata.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Place-Data-2022/eav7-hnsx>.

<sup>40</sup> EPA. Health and Environmental Effects of Particulate Matter (PM). Available at: <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>.

90<sup>th</sup> percentile in cancer risk, 90-95<sup>th</sup> percentile in air toxics respiratory hazard index, and 90<sup>th</sup> percentile for wastewater discharge by toxicity weighted concentration/m distance.

Table 26: EPA EJ Screen Report, City of Mobile

Selected Variables	Value	State		USA	
		Avg.	Percentile	Avg.	Percentile
Particulate Matter 2.5 ( $\mu\text{g}/\text{m}^3$ )	9.03	8.92	59	8.67	63
Ozone (ppb)	37.8	39	38	42.5	20
Diesel Particulate Matter* ( $\mu\text{g}/\text{m}^3$ )	0.462	0.223	92	0.294	80-90th
Air Toxics Cancer Risk* (lifetime risk per million)	33	35	65	28	80-90th
Air Toxics Respiratory HI*	0.48	0.47	79	0.36	90-95th
Traffic Proximity (daily traffic count/distance to road)	510	290	85	760	67
Lead Paint (% Pre-1960 Housing)	0.27	0.17	73	0.27	55
Superfund Proximity (site count/km distance)	0.029	0.051	49	0.13	27
RMP Facility Proximity (facility count/km distance)	0.68	0.46	79	0.77	66
Hazardous Waste Proximity (facility count/km distance)	2.1	0.9	86	2.2	71
Underground Storage Tanks (count/km <sup>2</sup> )	3.6	1.9	82	3.9	70
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.47	0.36	95	12	90

Source: [https://ejscreen.epa.gov/mapper/ejscreen\\_SOE.aspx](https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx) pulled on 1/22/2023

## VIII. Fair Housing Status

This section outlines the process of filing formal complaints, the data for Mobile cases, testing, and enforcement activity. Data for complaints filed at the federal level is documented to spot trends.

### Key Data and Insights:

- In the last 15 years, there have been 136 fair housing cases.
- The number of fair housing cases have decreased in the last 15 years.
- Race-based discrimination cases are the most common, followed by disability, sex, and familial status.
- While the number of cases has been decreasing, it should be noted that sixteen survey respondents felt they had been discriminated against but only three people had reported it in some way – by calling the Center for Fair Housing, the Mobile Housing Authority, or communicating with the Mayor. Mobile residents may not know their rights or course of action in the case of discrimination.

#### A. Complaints of Unlawful Discrimination

Fair Housing complaints must be submitted to the HUD Office of Fair Housing and Equal Opportunity (FHEO) within one year of the alleged discrimination under the Fair Housing Act. Once a complaint is received, the FHEO begins an investigation. The office will either conduct the investigation themselves or send the claim to the appropriate state or local agency for investigation.

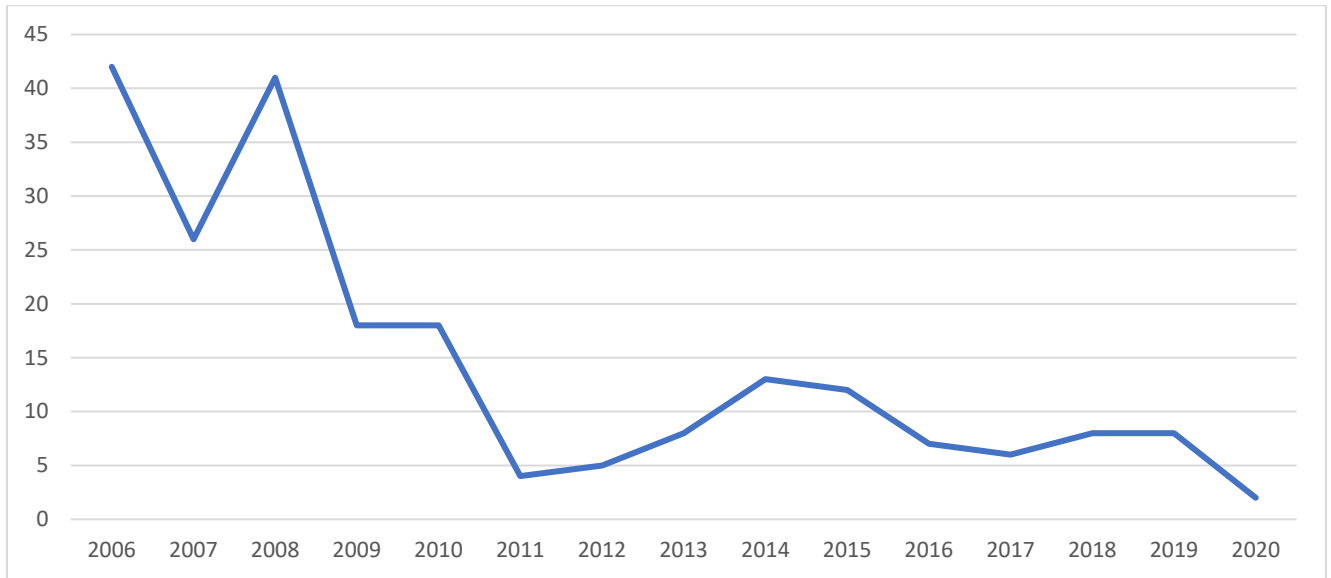
When the FHEO investigates a case, the agency will first check whether a formal complaint can be filed under one of the laws it enforces. FHEO will conduct an interview with the individual who wishes to file the complaint. If the complaint fits under fair housing discrimination, FHEO will draft a formal complaint, and the individual will sign the formal document. All parties will then be notified, and FHEO will try to help both parties reach an agreement. If, however, the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.<sup>41</sup> This legal action may include a Fair Housing Act or other civil rights case to seek compensation for victims, changes in training, or changes in policies and procedures. Victims of discrimination cannot be charged any fees or costs. Cases before HUD Administrative Law Judges are handled by HUD's Office of General Counsel, and cases in the federal courts are handled by the U.S. Department of Justice.

The FHEO records yearly data on the complaints received by county. Analyzing the complaints by county shows that there was a total of 218 complaints between 2006 and 2020. The complaints were highest in 2006 and then subsequently decreased with a low in 2020. At the same time, eviction moratoriums in 2020 may have led to a decrease in fair housing complaints. It is also important to note that the community needs assessment indicated that many people had felt discriminated against in the housing process but no one surveyed had filed a formal complaint. This finding should be investigated further as it could be due to a lack of knowledge about fair housing rights, distrust in the fair housing process, or other reasons that were not asked in this report.

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<sup>41</sup> U.S. Department of Housing and Urban Development. FHEO Complaint and Investigation Process. Available at: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/complaint-process#:~:text=As%20part%20of%20HUD%27s%20Fair%20Housing%20Assistance%20Program,formal%20complaint%20is%20filed%2C%20we%20investigate%20the%20allegations.](https://www.hud.gov/program_offices/fair_housing_equal_opp/complaint-process#:~:text=As%20part%20of%20HUD%27s%20Fair%20Housing%20Assistance%20Program,formal%20complaint%20is%20filed%2C%20we%20investigate%20the%20allegations.)

Figure 18: Number of Fair Housing Cases Over Time, Mobile County



Source: HUD FHEO Filed Cases, 2020, <https://catalog.data.gov/dataset//fheo-filed-cases>

FHEO data shows that the majority of complaints between 2006 and 2020 were for race-based discrimination; this is followed by disability and then sex discrimination. Race-based discrimination complaints were highest between 2006 and 2010 and have declined along with the other types of complaints. Table 28 below shows that most often race-based cases were often brought for a Black or African American race basis, which were 126 of the 136 race-based cases.

Table 27: Cases by Year based on Type of Discrimination, Mobile County

Year	Race	Hispanic	Color	National Origin	Disability	Familial Status	Religion	Sex
2006	34				11	9	2	15
2007	16				8	4		3
2008	27	1	2	1	11	9	1	8
2009	12	1		1	9	2		5
2010	14		1		2	2		4
2011	2				1	1		
2012	4				2	1		2
2013	3				3	1		
2014	3			1	3	4		3
2015	6				4	1		2
2016	5				2	1		1

Year	Race	Hispanic	Color	National Origin	Disability	Familial Status	Religion	Sex
2017	1		1		4			
2018	4				3	2		
2019	5				1			3
2020					1	1		
<b>Grand Total</b>	<b>136</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>65</b>	<b>38</b>	<b>3</b>	<b>46</b>

Source: HUD FHEO Filed Cases, 2020, <https://catalog.data.gov/dataset//fheo-filed-cases>

Table 28: Cases with Race Basis by Year Based on Race, Mobile County

Year	Cases with Race Basis	Black or African-American Race Basis	Black and White Race Basis	Native American Race Basis	White Race Basis
2006	34	32			2
2007	16	16			
2008	27	23			4
2009	12	10	1		1
2010	14	13			1
2011	2	2			
2012	4	4			
2013	3	3			
2014	3	3			
2015	6	5		1	
2016	5	5			
2017	1	1			
2018	4	4			
2019	5	5			
2020					
<b>Grand Total</b>	<b>136</b>	<b>126</b>	<b>1</b>	<b>1</b>	<b>8</b>

Source: HUD FHEO Filed Cases, 2020, <https://catalog.data.gov/dataset//fheo-filed-cases>

## B. Enforcement Activity

Fair housing complaints can be brought for any of the legally protected types of fair housing discrimination including race, color, religion, national origin, sex, disability, or familial status. Once a complaint is filed, HUD will begin investigation at no cost. While HUD first attempts to reach agreements between both parties, legal action may be taken. HUD maintains a database of fair housing legal action by City. The following cases were litigated:

- Thai Association of Alabama, et al. v. City of Mobile (S.D. Ala.): The case opened on May 7, 2021. The case raised “questions involving the application of the Religious Land Use and Institutionalized Persons Act (“RLUIPA”), 42 U.S.C. §§ 2000cc et seq., in particular, how a plaintiff may show a substantial burden on religious exercise, and, if shown, how a government must justify imposition of such a burden”. The case dealt with a meditation center operating out of a house that neighbors complained was not a permitted use. The meditation center attempted to relocate to another residentially zoned property but was met with strong opposition and denied by City Council. According to the Department of Justice, “The Division filed a brief and participated in oral argument in the appeal, arguing that the district court had applied the wrong standard for evaluating RLUIPA substantial burden claims. The Eleventh Circuit agreed and reversed and remanded for the district court to apply an approach modeled on the decisions of other circuits. The parties filed cross-motions for summary judgment on April 12, 2021”.<sup>42</sup>
- United States v. Hubbard Properties, Inc. (S.D. Ala.): The case opened in 2019. The complaint in the Fair Housing Act case brought Hunter’s Pointe, LLC, Hubbard Properties, Inc., and Bethany Petz—the owner, management company, and property manager of the 201-unit apartment complex in Mobile for disability-based discrimination. The complainant brought a case on the basis of refusal for transfer to the ground floor as reasonable accommodation for a heart condition. The case resulted in \$40,000 in damages to the complainant, as well as mandatory training and the implementation of a reasonable accommodation policy.<sup>43</sup>

## C. Fair Housing Claims

PENDING INFORMATION FROM FAIR HOUSING OFFICE

## IX. Public Sector Analysis

The Fair Housing Act prohibits explicit and implicit discriminatory practices through land use policies, building codes, public services, and other public and private practices, such as conditional or special use permits and real estate broker steering, that limit access to fair housing choice for members of federally protected classes.<sup>44</sup> Public and private policies should aim to further fair housing goals and address

<sup>42</sup> Department of Justice. Thai Meditation Association of Alabama v. City of Mobile Alabama.

<https://www.justice.gov/crt/case/thai-meditation-association-alabama-v-city-mobile-alabama-sd-ala>

<sup>43</sup> Department of Justice. United States v. Hubbard Properties. Available at:

<https://www.justice.gov/crt/case/united-states-v-hubbard-properties-inc-sd-ala>

<sup>44</sup> HUD, History of Fair Housing. Available at:

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/aboutfheo/history](https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutfheo/history).



potentially discriminatory practices and trends. This section reviews the regulations and policies in the City of Mobile that have an impact on access to fair housing.

#### Key Data and Insights:

- An update to the City’s Unified Development Code (UDC) encourages mixed-use projects by allowing more by-right development. Further, the code allows more flexibility in lot size by allowing development on small lots that were previously nonconforming.<sup>45</sup>
- Since 2018, Mobile has lost about 2,000 units in 2–4-unit structures while gaining about 3,000 units in 5–19-unit structures and about 1,000 units in 20 or more unit structures.<sup>46</sup> This indicates that older “missing middle” housing is likely being demolished while large apartments are being built.
- Residential R-1 is the most widespread zoning classification in the city. The R-1 zoning classification is designated single-family homes on 6,000 sq feet for urban and 7,200 sq ft for suburban lots. The single-family requirement may curtail additional housing in high opportunity neighborhoods.<sup>45</sup>
- The City recently piloted a neighborhood toolkit to aid neighborhood groups in proactively planning and envisioning the future of their neighborhood.<sup>45</sup>
- The City of Mobile is in plans to contribute \$30 million to a \$252 million effort to build a new, five gate commercial airport close to downtown.
- The City is working to build and expand transit connectivity in Mobile, including the opening of a passenger Amtrak route between New Orleans and Mobile, greenway development, and increasing bus volume.

#### A. Zoning and Site Selection

##### 1. Current Zoning

The current zoning map of Mobile shows that much of the city is large swaths of R-1 residential zoning with business zoning concentrated around arterial roads. Around downtown, there is more multifamily and special district zoning, and most industrial zones are located to the east of the city.

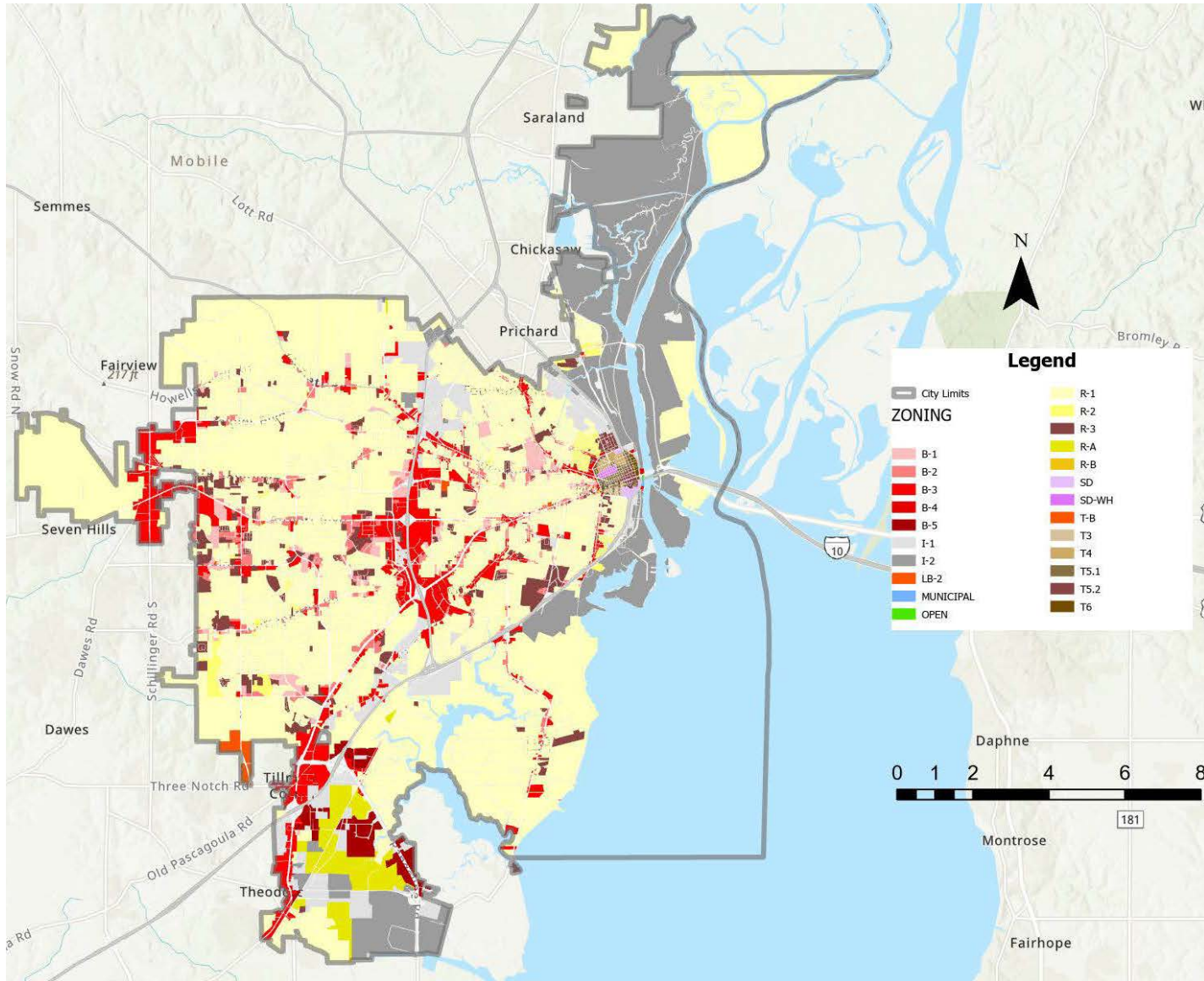
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<sup>45</sup> Map for Mobile. UDC Updates. Available at: <https://mapformobile.org/udc/#updates>

<sup>46</sup> U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates.



Figure 19: Mobile Zoning Map



Source: City of Mobile Opensource GIS Data

## 2. Future Zoning

In 2017, the City of Mobile launched a zoning code rewrite initiative to update the Unified Development Code (UDC). The UDC is the master code of regulations which determines the zoning and land use regulations of the entire city. Between 2017 and early 2021, the zoning code rewrite included three rounds of public review, planning commission hearings, and finally a City Council public hearing prior to adoption on July 12, 2022. The zoning code had not been updated in 60 years. As such, the outdated zoning code was both arduous and disconnected with current community needs. While the adoption of

the UDC did not change any zoning district, it did introduce new or streamlined regulations. Additionally, there is a future land use plan which does offer new potential zoning distinctions.

The updated UDC introduces important changes to guide Mobile's future development. Highlights of these changes are outlined below:

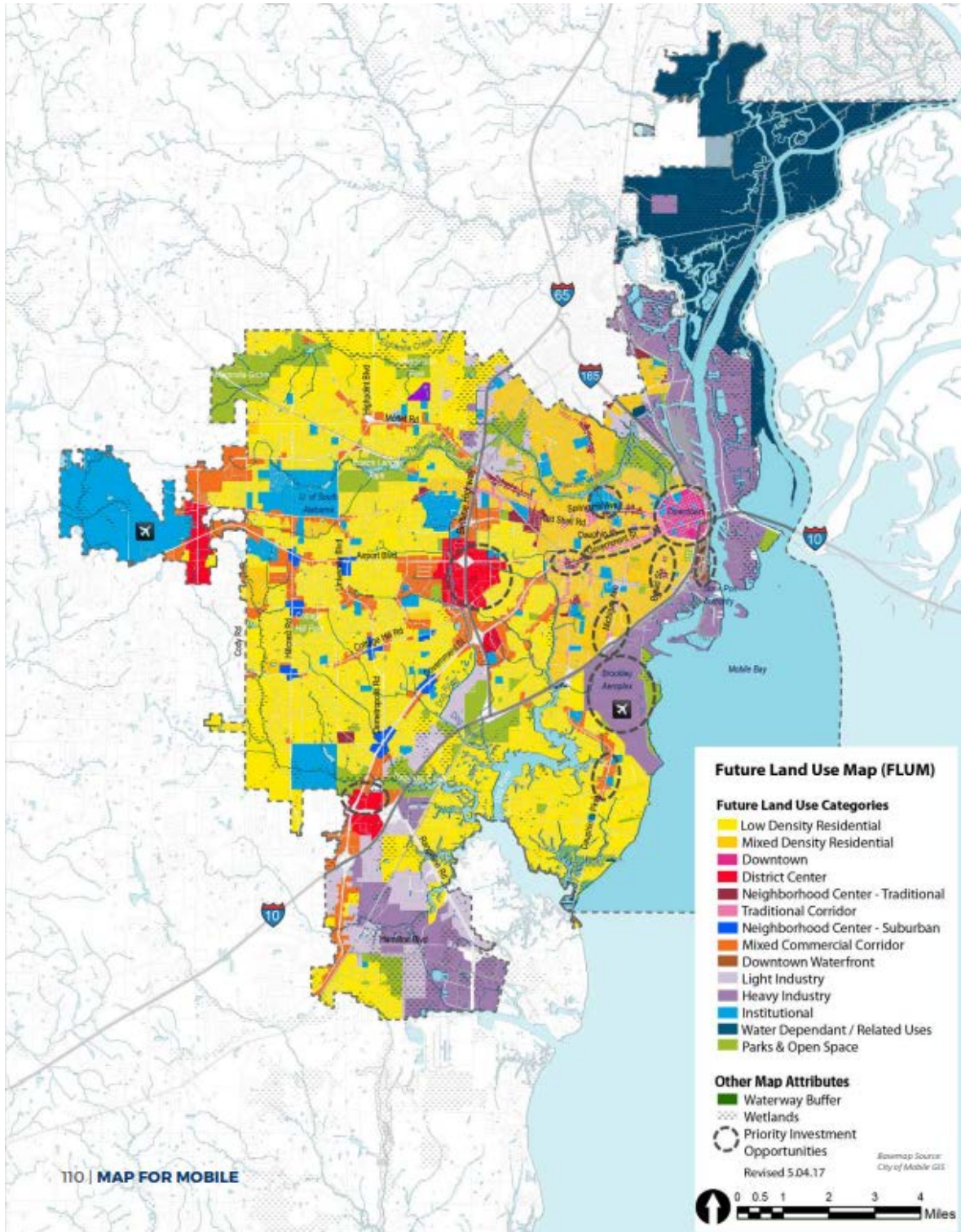
- Creates distinctions between urban and suburban development to guide site standards.
- Establishes the concept of riparian buffers to protect water quality and preserve natural areas adjacent to waterways and flood prone areas.
- Introduces form-based design standards to create more visual community cohesion.
- Provides more flexibility in site design and encourages mixed-use projects by allowing more variety of by-right development.
- Allows more flexibility in lot size for historically small lots that were previously prohibited to develop.<sup>47</sup>

The future land use map is shown below. Of note, it extends the allowed areas of mixed density residential.

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<sup>47</sup>Map for Mobile. UDC Updates. Available at: <https://mapformobile.org/udc/#updates>

Figure 20: Future Land Use Plan Map



Source: <https://mapformobile.org/flum-define/>



### 3. Multifamily Housing

The majority of Mobile’s housing stock is single-family detached housing followed by 5–19-unit large apartments. Since 2018, Mobile has lost about 2,000 units in 2–4-unit structures while gaining about 3,000 units in 5-19 unit structures and about 1,000 units in 20 or more unit structures. At the same time, 1-unit, detached structures have remained fairly stagnant. This indicates that older “missing middle” housing is likely being demolished while large apartments are being built. Missing Middle is a term used to describe the range of housing density between “single-family detached home and mid-rise apartment building” that was prevalent in the early twentieth century but has been made difficult to construct and maintain in most American cities.<sup>48</sup>

Table 29: Types of Housing Mobile

Property Type	Number	Percent
1-unit detached structure	61,934	68.0%
1-unit, attached structure	1,241	1.4%
2-4 units	5,030	5.5%
5-19 units	14,512	15.9%
20 or more units	7,198	7.9%
Mobile Home, boat, RV, van, etc.	1,162	1.3%
<b>Total</b>	<b>91,077</b>	

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates

The future land use plan, publicly available on the City’s open-source online map, indicates that much of the single-family zoning designation around downtown may change to mixed density residential. This will both allow more missing middle development and likely allow more opportunity for people to live within a shorter distance of the jobs and opportunity offered in downtown.<sup>49</sup>

### 4. Manufactured Housing

Manufactured housing is a major source of naturally occurring affordable housing in the United States. While “more Americans live in manufactured housing than public housing and other U.S. Department of Housing and Urban Development (HUD)–subsidized rental housing combined (U.S. Census Bureau, 2019)”, it is very often either prohibited in cities or pushed to the margins.<sup>50</sup> In Mobile, manufactured (mobile) homes are allowed only by conditional use permit in R-A, R-1, R-2, and R-3 zoning districts. This means that the use has to go in front of Council to approve or reject which may make the housing prohibitive under certain council regimes. Manufactured Housing Land Lease Communities are allowed only by conditional use permit in R-3.

<sup>48</sup>Planetizen. “What is Missing Middle Housing?”. Available at: <https://www.planetizen.com/definition/missing-middle-housing>

<sup>49</sup>City of Mobile (2023) Online Mapping. Available at: <https://cityofmobile.maps.arcgis.com/apps/webappviewer/index.html?id=bd23698751f14096b2fd7cfb28fba5ea>

<sup>50</sup>Lamb, Shi & Spicer (2022). Why Do Planners Overlook Manufactured Housing and Resident-Owned Communities as Sources of Affordable Housing and Climate Transformation? Available at: <https://www.tandfonline.com/doi/full/10.1080/01944363.2022.2038238?journalCode=rjpa20>

## 5. Group Living

Regulations around group living are an important consideration for fair housing as these regulations may allow or prohibit housing available for people with disabilities, elderly people, people recovering from substance abuse, people needing emergency shelter etc. In the new UDO, group living, which is defined as “Community residence, family (less than 5 persons unrelated people with disabilities where length of stay is years)” is allowed by right in most residential zoning districts. Group living which is defined as “Community residence, family (5 or more persons unrelated people with disabilities where length of stay is years)” is only permitted by conditional use permit in most residential zoning districts. That is, only by City Council approval.

Community residence, transitional (less than 5 persons unrelated people with disabilities where length of stay is weeks or months) is allowed by right in many zoning distinctions except for lower density residential (R-A, R-1, R-2). This may make it difficult to find a house to use for this purpose. Community residence, transitional (5 or more unrelated persons with disabilities where length of stay is weeks or months) is only allowed in some residential zoning districts by conditional use permit.

Both emergency refuges and shelters are allowed in a limited amount of mostly business districts, with emergency refuges allowed by right and shelters requiring a special exception use permit in most districts they may be allowed which must be approved by the Board of Adjustment (BZA). Retirement home or elderly housing is an allowed use by right in most higher density residential classifications. Lastly, rooming and boarding and hotels/motels/and hostels, a sometimes-important option to avoiding homelessness, are allowed by right in two business districts. Overall, most needed uses are allowed, but the barriers to getting Board of Adjustment or Council approval may be too expensive or arduous to operate. Additionally, some residential uses for more vulnerable populations are only allowed in business districts that likely have more expensive real estate.<sup>51</sup>

## 6. Zoning Requirements for Residential Districts

The below table shows the minimum lot size, setbacks, lot coverage, and density of the four residential zoning classifications. The recent change to both urban and suburban classifications allows more flexibility around minimum lot size, setbacks, and lot coverage closer to the urban core. Ideally, this should make harder-to-develop small lots near the urban core more attractive for redevelopment opportunities. At the same time, though, R-1 is the most widespread zoning classification in the city and the single-family nature may curtail additional housing in high opportunity neighborhoods. In addition to these residential zoning classifications, there are also mixed-use options which also allow more flexibility around residential development.

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<sup>51</sup> City of Mobile Unified Development Code, available at: <https://www.cityofmobile.org/uploads/22061003373302ZoningAmendedMay172022datecorrected.pdf>

Table 30: Residential Zoning Requirements from UDO

Zoning classification	Minimum lot size	Setbacks	Lot coverage	Density
R-A (residential agriculture)	1 acre	25 ft front yard, 10 feet side yard, 10 feet back yard	35%	1 dwelling/lot
R-1	6,000 sq feet for urban and 7,200 sq ft for suburban	5 feet front, side and rear for urban. 25 feet front, 5 ft side, and 8 ft rear for suburban.	50% urban, and 35% suburban	1 dwelling/lot
R-2	4,000 sq ft for urban, 8,000 sq ft for suburban	5 ft front, side, and rear yard for urban. 25 ft front, 5 ft side, and 8 feet rear for suburban	50% urban, and 40% suburban	20 dwelling units/acre for urban, and 10 dwelling units/acre for suburban
R-3 (multifamily)	4,000 sq ft for urban, 10,000 sq ft for suburban	10 ft front, 5 ft rear and side for urban. 25 ft front, 10 ft rear and side for suburban	50% urban, and 45% suburban	30 dwelling units/acre for urban, and 25 dwelling units/acre suburban
R-B (residential business, residential + light commercial uses)	4,000 sq ft	0 to 5 ft for all sides	75%	10 dwelling units/acre

Source: Chapter 64 City of Mobile Unified Development Code, available at: <https://www.cityofmobile.org/uploads/22061003373302ZoningAmendedMay172022datecorrected.pdf>

## 7. Other Considerations

In some parts of the city, industrial uses are co-located with residential uses. Section VII discussed the environmental impacts of air quality, water quality, and other toxic co-location on residents. While the allowance of industrial near residential may allow residents to more easily access jobs, it also likely has harmful health impacts. Of specific note, the location of the current and future airport near some of the densest allowed residential development in the city may threaten the air quality of many residents.

### B. Neighborhood Revitalization and Municipal and Other Services

The City of Mobile has recently implemented, piloted, or maintained various programs for neighborhood revitalization. Of note, the city recently piloted a neighborhood toolkit to aid neighborhood groups in proactively planning and envisioning the future of their neighborhood. The toolkit provides resources including a description of the process for creating a neighborhood plan, a neighborhood engagement handbook, and a neighborhood initiative handbook to provide guidance and resources for implementing

various types of projects or initiatives in the neighborhood.<sup>52</sup> Using these tools, residents can form neighborhood planning groups, follow City guidance to create neighborhood plans, and receive approval from the City to aid in future municipal decisions about capital improvement funding and other resources.

Additionally, Mobile currently has multiple programs for home repair and other blight remediation:

- A program that aids minority contractors in rehabilitating blighted properties in lower-income neighborhoods with a maximum grant of \$20,000 per unit;
- A partnership with Legal Services Alabama to help clear clouded heir-property titles which contribute to increased vacancies;<sup>53</sup>
- A Critical Repair Program providing grants to needs-based, qualified homeowners for major repairs;<sup>54</sup>
- A Down Payment Assistance program to assist qualified homebuyers with down payment and closing cost assistance; and
- The City works with local nonprofits on exterior paint work to assist LMI homeowners.

### C. Employment-Housing-Transportation Linkages

For employment-housing-transportation linkages, the City is undertaking a wide variety of projects. Of recent importance, the City of Mobile is in plans to contribute \$30 million to a \$252 million effort to build a new, five gate commercial airport close to downtown. The development will move their airport from the West Mobile location to the Brookley Aeroplex location in the southeast of the city. The new airport will meet international designation and connect Mobile's businesses to a more international economy.<sup>55</sup> A \$1 billion Airbus expansion connected to the airport should add 1,500 new jobs centrally located near downtown Mobile.

Other transportation connectivity projects include the opening of a passenger Amtrak route between New Orleans and Mobile that has been out of commission since Hurricane Katrina. The twice daily trips which are estimated to take 3 hours and 23 minutes are scheduled to begin in 2023.<sup>56</sup> The Amtrak route should offer more options for connectivity across the Southeast. Additionally, Mobile is constructing a

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<sup>52</sup> Map for Mobile. Neighborhood Toolkit. Available at: <https://mapformobile.org/toolkit/>

<sup>53</sup> AL.com (2021). Mobile turns blighted homes into affordable housing: 'These people, they helped me'. Available at: <https://www.al.com/news/2021/11/mobile-turns-blight-into-affordable-housing-these-people-they-helped-me.html>

<sup>54</sup> WRKG (2022) "Mobile Accepting Critical Repair grant applications", available at: <https://www.wkrg.com/mobile-county/mobile-accepting-critical-repair-grant-applications/>

<sup>55</sup> AL.com (2022). 'Mobile International Airport' can now be part of the conversation. Available at: <https://www.al.com/news/mobile/2022/04/mobile-international-airport-can-now-be-part-of-the-conversation.html>

<sup>56</sup> Mississippi Today. (2022). Details emerge over Gulf Coast Amtrak route from Mobile to New Orleans, as former enemies become funding partners. Available at: <https://mississippitoday.org/2022/12/16/details-emerge-over-gulf-coast-amtrak-route-from-mobile-to-new-orleans/>

new I-10 toll bridge with \$375 million in funding from federal and state sources which will span the length of Mobile Bay.<sup>57</sup> Construction is set to begin in 2023, with a design-build structure that emphasizes hiring small business and minority contractors.<sup>58,59</sup>

To improve alternative transportation and local connectivity, the city is putting effort into the Broad Street Initiative, Mobile Greenway Initiative, Three Mile Creek, Brookley by the Bay, and the Capital Improvement Plan (CIP) which includes the improvement of sidewalks and other infrastructure for walkability.<sup>60</sup> The Broad Street Initiative is a \$22 million dollar project to add pedestrian infrastructure, a roundabout, bike land, and separated multi-use path to one of the city's major thoroughfares.<sup>61</sup> Three Mile Creek is a proposed walking and biking trail which will restore the health of the watershed and link neighborhoods, parks, and commercial districts. Brookley by the Bay is planned to be a 98-acre park south of downtown which will provide residents access to the Mobile waterfront, as well as providing ecological restoration and strengthening pedestrian and bike connections between downtown and communities along Dog River.<sup>62</sup>

For public transit, the WAVE Transit Public Transportation Authority runs buses, shuttles, and a trolley. The agency changed management in 2018 and the routes have been adjusted to improve ridership. The below map outlines the most recent transit trip map. In 2021, Mobile made plans to add nine buses and ten mobility vans to the fleet using COVID pandemic related relief money.<sup>63</sup> Despite these efforts, stakeholders mention that the bus services lack the coverage and frequency to be reliable for many residents' daily commute and other lived needs. Specifically, they mention the amount of transfers needed for commute trips causing trouble with reliability, and they also mentioned the lacking availability of late night trips for service and other shift workers.

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<sup>57</sup> WKRG (2022). New I-10 Mobile Bridge, Bayway Project moves forward with additional funding. Available at: <https://www.wkrg.com/mobile-county/new-i-10-mobile-bridge-bayway-project-moves-forward-with-additional-funding/#:~:text=The%20bridge%20will%20span%20the,funding%2C%E2%80%9D%20reads%20the%20release>.

<sup>58</sup> Advance Local Media. (2022). ALDOT says \$2.7 billion Mobile I-10 project 'financially viable,' and is fully on board. Available at: <https://www.al.com/news/2022/12/aldot-says-27-billion-mobile-i-10-project-financially-viable-and-is-fully-on-board.html>

<sup>59</sup> [ALDOT says \\$2.7 billion Mobile I-10 project 'financially viable,' and is fully on board - al.com](https://www.al.com/news/2022/12/aldot-says-27-billion-mobile-i-10-project-financially-viable-and-is-fully-on-board.html)

<sup>60</sup> Map for Mobile Framework for Growth (2021). Five-Year Status Report to the Community. Available at: <https://mapformobile.org/wp/wp-content/uploads/2021/06/FiveYearReport2020.pdf>

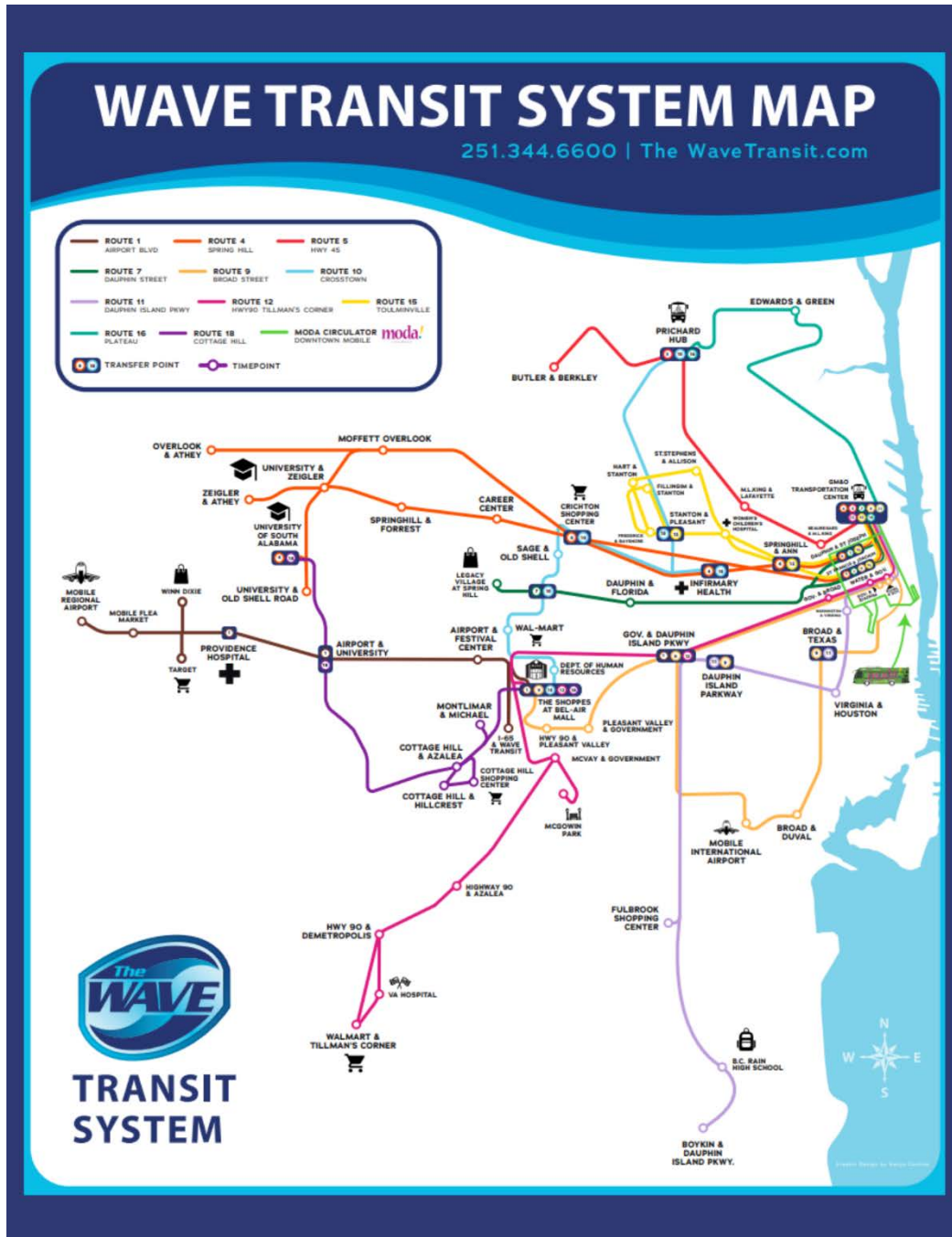
<sup>61</sup> WKRG News. (2023). Broad Street revitalization ready for good times to roll. Available at: <https://www.wkrg.com/mardi-gras/broad-street-revitalization-ready-for-good-times-to-roll/>

<sup>62</sup> Scape Studio. (2023). City of Mobile releases vision for Brookley by the Bay. Available at: <https://www.scapestudio.com/news/2023/02/city-of-mobile-releases-vision-for-brookley-by-the-bay/>

<sup>63</sup> AL.com (2021). Mobile unveils new buses as mayoral candidates pitch transit plans. Available at: <https://www.al.com/news/mobile/2021/07/mobile-unveils-new-buses-as-mayoral-candidates-pitch-transit-plans.html>



Figure 21: Wave Transit System Map



Source: Wave Transit, <https://www.thewavetransit.com/247/All-Routes-Map>

#### D. Historical Regulations

There are currently seven districts in Mobile on the National Register of Historic Places. Many of these districts are located around downtown. As the Mobile Historic Development Commission outlines for residents on the website:

If (your home) is between Houston and Broad and between Springhill Avenue and Texas Street, there is a high likelihood that your building is in a historic district. Also, if you have property in the Henry Aaron Loop south of Dauphin or in the neighborhood just west of the Post Office it is probably in a historic District.<sup>64</sup>

If a building is located in the historic district, any repairs or redevelopment must go to and be approved by the Mobile Historic Development Commission. Additionally, it is difficult to increase the density or change the zoning of historic neighborhoods to accommodate changing demographics or community need. At the same time, historic regulations can provide more cohesive neighborhood aesthetics.

In interviews, stakeholders spoke to difficulty in redeveloping blight due to historic regulations. Similarly, they mentioned that house repairs may be cost prohibitive to some homeowners due to historic regulation. Interviews indicated that historic building and district regulations may prohibit quickly and affordably rehabilitating old housing stock to create quality rentals for people seeking housing.

#### E. Property Tax Policy

The Revenue Commissioner is responsible for determining real property value and its corresponding ad valorem tax, which includes land and improvements. The value must be set according to “fair and reasonable market value.” The appraiser must “set the value of the property as if it were ‘sold’ in an ‘arms length’ transaction between a ‘willing buyer and a willing seller,’ neither being under any pressure to buy or sell.”

Among Mobile County jurisdictions, the City of Mobile has the highest property tax millage rate at 63.5, Mt. Vernon has the lowest millage rate of a municipality at 53.0, while unincorporated Mobile County, has the lowest regional millage rate of 48.5.<sup>65</sup>

#### F. Planning and Zoning Board Representation

The planning and zoning boards were assessed for equity and citywide representation. Both boards are appointed by the mayor. Based on the honorifics published online (Mr. and Mrs.), the latest Planning Commission has eight male-identified planning commissioners and three female planning commissioners. Similarly, the Board of Zoning Adjustment seems to be all male-identified or similarly disproportionate. Both the planning commission and zoning boards are disproportionately real estate industry executives, which is likely not representative of the income and occupations of Mobile residents and potentially may lead to decision making that is not representative of Mobile residents.

#### G. Building Code (Accessibility)

The Mobile Building Code follows the Alabama Code Section 11-45-8 (1975), the 2012 Edition of the International Building Code and all amendment to the same. Regarding fair housing and accessibility, Mobile also adopted Appendix E – Supplementary Accessibility Requirements. The Alabama Building Code follows the Americans with Disability Act (ADA) 2010 Standards for Accessible Design which sets minimum regulations for construction of public buildings and businesses, especially around doorway and hallway widths, entrances, and accessible parking. Additionally, there are some multifamily dwelling

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<sup>64</sup>Mobile Historic Development Commission. FAQs and Timesavers. Available at: <http://www.mobilehd.org/faqs.html>

<sup>65</sup> Mobile County Revenue Commission, FAQs. Available at: <https://www.mobilecopropertytax.com/general-questions/>

regulations in regard to accessible building entrances, connected spaces, common use areas, and kitchens and bathrooms. Accessible routes are required for multifamily containing five or more units.

## X. Public and Subsidized Housing

The Mobile Housing Authority (MHA) is the housing authority for the City of Mobile. It was established to provide federally funded public housing programs and related services to Mobile’s low-income residents.<sup>66</sup> The MHA operates an Affordable Housing Program that provides public housing for families and seniors, the Housing Choice Voucher Program that provides rental assistance to eligible families, and senior living services and support.<sup>67</sup> The MHA also provides community and family supportive services to assist seniors and families.

### Key Data and Insights:

- The majority (96 percent) of residents residing in public housing and using vouchers are Black or African American.<sup>68</sup>
- Mobile is currently in plans to demolish three public housing developments. With thousands of households on the waitlist for public housing units and vouchers, supply of affordable housing is not able to meet demand.
- Some rentals do not accept housing vouchers, further limiting the use of housing vouchers in an already limited rental market.

### A. Overview of Units

The MHA operates 1,363 public housing units and assists 3,544 households through the Housing Choice Voucher Program. The majority (96 percent) of residents residing in public housing and using vouchers are Black/African American. The average annual income of residents served by the MHA is \$13,936 for public housing and \$14,242 for Housing Choice Vouchers. Both figures are 22 percent less than the FY 2022 extremely low-income limit of \$18,310 established by HUD for Mobile County for a two-person household; for a household of four these incomes are 49 percent less than the FY 2022 income of \$27,750.

The combined waiting lists for MHA, as of January 18, 2023, counted 3,426 households.

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<sup>66</sup> Mobile Housing Authority. History. Available at: <https://www.mobilehousing.org/aboutus/history>.

<sup>67</sup> Mobile Housing Authority. Housing. Available at: <https://www.mobilehousing.org/>.

<sup>68</sup> AFFHT Tool 2020 Data Decennial Census, ACS

Table 31: Public and Subsidized Housing by Program Type

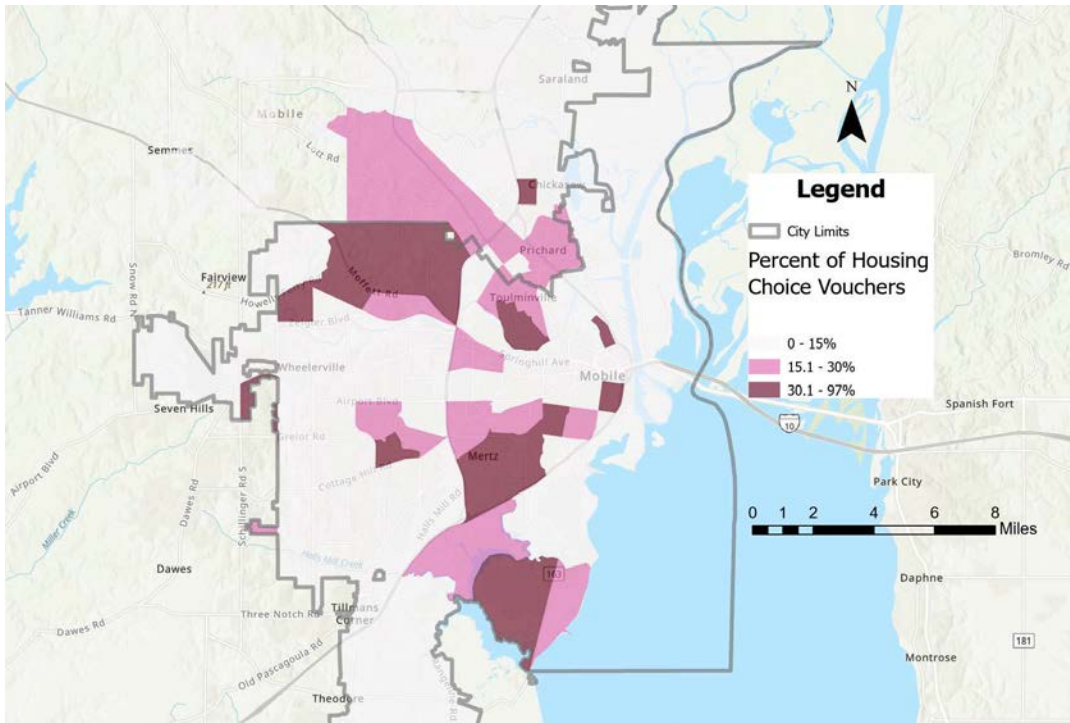
	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	2,161	3,396	0	3,322	20	14	23

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

Source: PIC (PIH Information Center)

The map below shows the current location of percent of households that are subsidized by public housing vouchers in Mobile.

Figure 22: Percent Households Subsidized Public Housing Vouchers



Source: HUD Open Data Housing Choice Voucher by Tract, Accessed 2023 at: <https://hudgis-hud.opendata.arcgis.com/maps/8d45c34f7f64433586ef6a448d00ca12>

## B. Tenant Selection Eligibility

To get into one of the units of traditional public housing, tenants must apply and then meet basic affordable housing eligible criteria of suitability requirements. The requirements include:

1. Age – In most communities, the head of householder must be 19 years or older, an emancipated minor, or applying with a spouse 19 and over. For housing set aside for senior citizens, the applicant must be age 62 and up.
2. Income Requirements – HUD establishes income limits for a family’s total, gross income to participate in the Affordable Housing Program. Families must fall at or below the low-income limit, which is 80% or less the Area Median Income. For FY 2022, income from all sources for a family of four had to be \$52,250 or less. For a one-person household, the income limit was \$36,600 or less.<sup>69</sup>
3. Other – households must also have citizenship status and meet the suitability requirements for background information related to previous tenancies, debts, and criminal history.<sup>70</sup>

If an applicant meets all the above requirements, they will be added to the Mobile Housing Authority waiting list and then contacted as units become available.

## C. Loss of Units

The Mobile Housing Authority has submitted plans to move forward with demolishing Thomas James Place, R.V. Taylor Plaza, and Boykin Tower developments by 2026 due to the poor conditions of the properties. This reduces the stock of public housing units by 50 percent, or over 1,300 units, from previous years. As the Mobile Housing Authority reduces public housing units, access to affordable rental units will continue to be limited.

Currently, the Mobile Housing Board has a waiting list of 3,426 for public housing units and vouchers. Development of new units will be necessary as well to address the loss of public housing units being demolished. With increasing market rents, and few protections for renters in Alabama, households with vouchers will need more affordable housing options throughout the city. Stakeholders and community survey respondents mentioned that some rentals do not accept housing vouchers and exclude prospective renters using housing vouchers further limiting the use of housing vouchers in an already limited rental market.

## D. Demographics of Households Using Public and Subsidized Housing

The majority of households in public housing are Black households (78.1 percent), followed by White (17.7 percent) and Hispanic (3.5 percent) households. Similarly, 91.1 percent of households in Mobile using Housing Choice Vouchers are Black, 7.3 percent of households using HCVs are White, and 1.1 percent are Hispanic.

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<sup>69</sup> HUD User. Income Limit Dataset. Available at:

<https://www.huduser.gov/portal/datasets/il/il2022/2022summary.odn>

<sup>70</sup> Mobile Housing Authority, “Affordable Housing”. Available at : <https://www.mobilehousing.org/housing-programs/affordable-housing>

Table 32: Race and Ethnicity of Public and Subsidized Housing Type

Mobile CDBG Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Public Housing	105	17.7%	464	78.1%	21	3.5%	1	0.2%
Project-Based Section 8	106	20.0%	407	76.9%	4	0.8%	10	1.9%
Other Multifamily	245	70.0%	90	25.7%	9	2.6%	3	0.9%
HCV Program	114	7.3%	1,429	91.1%	17	1.1%	5	0.3%

Source: AFFHT Tool 2020 Data Decennial Census, ACS

Forty-six percent of public housing units are in R/ECAP tracts and 23 percent of units in the HCV Program are in R/ECAP tracts. None of the project-based Section 8 units or other multifamily units are in a R/ECAP tract.

Table 33: Public Housing Units by R/ECAP

Mobile CDBG Jurisdiction	Total number units (occupied)	Percent of units (occupied)
<b>Public Housing</b>		
R/ECAP tracts	281	46%
Non R/ECAP tracts	325	54%
<b>Total</b>	<b>606</b>	
<b>Project-based Section 8</b>		
R/ECAP tracts	N/A	0%
Non R/ECAP tracts	513	100%
<b>Total</b>	<b>513</b>	
<b>Other Multifamily</b>		
R/ECAP tracts	N/a	0%
Non R/ECAP tracts	287	100%
<b>Total</b>	<b>287</b>	
<b>HCV Program</b>		
R/ECAP tracts	371	23%
Non R/ECAP tracts	1,242	77%
<b>Total</b>	<b>1,613</b>	

Source: AFFHT Tool 2020 Data Decennial Census, ACS

## XI. Private Sector Analysis

Private sector policies around housing have the potential to further or limit fair housing goals. This section reviews key private sector policies and practices that may affect fair housing choice and access in Mobile.



**Key Data and Insights:**

- White borrowers make up a disproportionate number of home loan recipients compared with Black or African American borrowers.<sup>71</sup>
- The average loan amount is greater for White borrowers than Black or African American borrowers, which may limit access to homeownership, and in turn long-term wealth and stability for Black or African American borrowers.<sup>73</sup>
- Roughly 3 percent of Mobile County residents identify as Hispanic or Latino while 2 percent of borrowers in Mobile County were Hispanic or Latino.<sup>73</sup>
- Male and joint borrowers have a higher average loan amount than female borrowers.
- Black or African American applicants are denied at a higher rate (23 percent) than White applicants (14 percent).<sup>73</sup>
- Some real estate practices, including rental application fees and other upfront costs, rejection of Housing Choice Vouchers, and income minimums create barriers for low-income households to access housing in Mobile.

**A. Lending Policies and Practices**

Homeownership provides a path towards building wealth and gaining long-term housing stability.<sup>72</sup> At the same time, low-income households and federally protected classes continue to lack access to fair lending opportunities or lag behind in the economic benefits associated with homeownership due to the lingering effects of historic lending practices and policies that systematically excluded members of federally protected classes from homeownership opportunities. The following section analyzes current lending patterns within Mobile and the greater metropolitan area to assess overall access to home lending for federally protected classes to identify potential barriers to fair housing.

Home lending patterns are established using the latest available data from the Home Mortgage Disclosure Act (HMDA) for Mobile County in 2021. This section includes a discussion of lending disparities, denial rates, and denial reasons, such as debt-to-income ratio, down payment, or credit history, for federally protected classes.

**1. Loan Origination, Type, and Purpose**

From 2018 to 2021, there were an average of 10,509 originated loans per year. Originated loans have been increasing steadily in Mobile County from year to year, with the greatest percent change occurring from year 2019 to year 2020.

*Table 34: Originated Mortgages, Mobile County, 2018–2021*

Year	All originated loans	Percent Change from Previous Year
2021	14,150	19.1%
2020	11,882	39.5%

<sup>71</sup> HMDA Dataset <https://ffiec.cfpb.gov/data-browser/data/2018?category=nationwide>

<sup>72</sup> Joint Center for Housing Studies of Harvard University, 2019 <https://www.jchs.harvard.edu/research-areas/homeownership>.

Year	All originated loans	Percent Change from Previous Year
2019	8,515	13.7%
2018	7,488	-

Source: HMDA (2021)

In 2021, 64 percent of lending activity in Mobile County was in the form of conventional loans, which are private loans that are not backed by a government entity. Nationally, conventional loans comprised 79 percent of all lending activity in 2021.<sup>73</sup> A smaller percentage of conventional loans in Mobile may signal market gaps in the local private lending market and possibly indicate a lack of savings or income for residents in Mobile. Federal Housing Administration (FHA) loans, which are mortgages issued by lenders approved by and insured by the FHA, made up 20 percent of loans in Mobile County in 2021. These loans have lower down payment requirements and other underwriting criteria that make them more accessible to borrowers with limited assets or lower credit scores.<sup>74</sup> Nationally, FHA loans comprise 11 percent of lending activity. Other loans, such as Veterans Administration (VA) and the United States Department of Agriculture (USDA) loans, which are tailored for particular borrowers, such as veterans in the case of VA loans and rural residents in the case of USDA loans, were 13 percent and 2 percent of lending activity in Mobile County, respectively. These types of loans help to address potential lending gaps for borrowers that have historically needed additional support to secure a mortgage.

Table 35: Loan Type, Mobile County, 2021

Loan Type	Number of Records	Loan Amount	Percent of Total
Conventional	16,671	\$2,905,455,000	64%
Federal Housing Administration insured	5,258	\$919,150,000	20%
Veterans Affairs guaranteed	3,335	\$699,195,000	13%
USDA Rural Housing Service or Farm Service Agency guaranteed	605	\$108,495,000	2%

Source: HMDA (2021)

A market that relies more heavily on conventional loans is an indicator of a healthy lending and real estate market, as borrowers and lenders opt for more conventional loans. However, a shift from government-backed mortgages may also signal a narrowing of options for borrowers from federally protected classes that have been historically left out of the private mortgage market and homeownership.

In addition to home purchase loans, cash-out refinancing and refinancing were significant components of the lending market in Mobile County in 2021. Forty-nine percent of lending activity was for refinancing or cash-out purposes. Forty-three percent of lending activity was for home purchases. The average loan amount for a home purchase was \$199,762, while the average loan amount for refinancing

<sup>73</sup> 3FFEIC, HMDA Dataset <https://ffiec.cfpb.gov/data-browser/data/2018?category=nationwide>

<sup>74</sup> U.S. Department of Housing and Urban Development. "Let FHA Help You," Available at: <https://www.hud.gov/buying/loans>.



was \$177,240. Home improvement loans comprised roughly 4 percent of lending activity with an average loan amount of \$74,893.

Table 36: Loan Purpose, Mobile County, 2021

Loan Purpose	Number of Records	Loan Amount	Percent of Total
Home purchase	11,013	\$2,199,975,000	43%
Home improvement	935	\$70,025,000	4%
Refinancing	8,312	\$1,473,220,000	32%
Cash-out refinancing	4,361	\$770,715,000	17%
Other purpose	1,055	\$98,475,000	4%
Not applicable	193	\$19,885,000	1%

Source: HMDA (2021)

Among home purchase loans in Mobile County, 56 percent were conventional loans, 28 percent were FHA loans, 11 percent were VA loans, and 5 percent were USDA loans. With 44 percent of home purchase loans coming from sources backed by a government entity, the home purchase market is responding to the needs of lower income households and members of federally protected classes. At the same time, the market is also responding to the needs of borrowers able to qualify for traditional home loans through the private market.

Table 37: Loan Type for Home Purchase Loans, Mobile County, 2021

Loan Type	Number of Records	Loan Amount	Percent of Total
Conventional	6,184	\$1,215,800,000	56%
FHA	3,050	\$581,840,000	28%
VA	1,232	\$302,730,000	11%
USDA	547	\$99,605,000	5%

Source: HMDA (2021)

In 2021, 71 percent of loans in Mobile County were given to White borrowers and 22 percent of loans were given to Black or African American borrowers. Given that approximately 57 percent of Mobile County residents are White and 36 percent are Black or African American, White borrowers make up a disproportionate number of loan recipients compared with Black or African American borrowers. The average loan amount for Non-Hispanic White borrowers was \$179,057, while the average loan amount for Non-Hispanic Black or African American borrowers was \$158,954. Such discrepancies highlight a disparity in access to capital for communities of color in Mobile County, limiting access to homeownership, and in turn long-term wealth and stability.

Table 38: Lending Activity by Derived Race of Borrower, Not Hispanic or Latino, Mobile County, 2021

Race	Number of Records	Percent of Loans	Total Amount	Average Loan Amount
White	13,911	71%	\$2,490,865,000	\$179,057
Black or African American	4,370	22%	\$694,630,000	\$158,954
Asian	452	2%	\$93,770,000	\$207,456
Joint <sup>75</sup>	220	1%	\$38,320,000	\$174,182
American Indian or Alaska Native	146	1%	\$21,420,000	\$146,712
Native Hawaiian or Other Pacific Islander	23	0.1%	\$4,035,000	\$175,435
2 or more minority races	34	0.2%	\$5,600,000	\$164,706
Race Not Available	422	2%	\$75,090,000	\$177,938

Source: HMDA (2021)

The Hispanic or Latino population in Mobile County was slightly underrepresented in lending activity in 2021. Roughly 3 percent of Mobile County residents identify as Hispanic or Latino while 2 percent of borrowers in Mobile County were Hispanic or Latino. The average loan amount for Hispanic or Latino borrowers (\$164,714) was slightly lower than the average loan amount for Non-Hispanic or Latino borrowers (\$174,864).

Table 39: Lending Activity by Derived Ethnicity of Borrower, Mobile County, 2021

Ethnicity	Number of Records	Percent of Loans	Total Amount	Average Loan Amount
Hispanic or Latino	524	2%	\$86,310,000	\$164,714
Not Hispanic or Latino	19,580	76%	\$3,423,830,000	\$174,864
Ethnicity Not Available	5,494	21%	\$1,072,370,000	\$195,189

Source: HMDA (2021)

Male borrowers represented 34 percent of lending activity in Mobile County in 2021, while female borrowers represented 24 percent of activity. The average loan amount for male borrowers (\$176,974) was greater than for female borrowers (\$144,780). Joint applications with male and female co-applicants accounted for 26 percent of lending activity with a higher average loan amount at \$199,093.

<sup>75</sup> Since the derived variable provided by HMDA combines borrower and co-borrower characteristics, about 1 percent of loans reported as “Joint” where the borrower and co-borrower stood for a combination of White and non-White races that could not be classified under one of the other race categories. Methodology available at: <https://github.com/cfpb/hmda-platform/wiki/Derived-Fields-Categorization-2018-Onward>

Table 40: Lending Activity by Derived Sex, Mobile County, 2021

Sex	Number of Records	Percent of Loans	Total Amount	Average Loan Amount
Female	6,327	24%	\$916,025,000	\$144,780
Male	8,781	34%	\$1,554,005,000	\$176,974
Joint	6,826	26%	\$1,359,010,000	\$199,093
Sex Not Available	3,935	15%	\$803,255,000	\$204,131

Source: HMDA (2021)

Looking at the intersection of federally protected classes, race and sex, White female borrowers represent 58 percent of female borrowers while Black or African American female borrowers represent 32 percent of female borrowers. The average loan amount for White female borrowers is \$144,513, slightly higher than the average loan amount for Black or African American female borrowers (\$143,599). Similarly, the majority of male borrowers and joint borrowers are White, while 20 percent of male borrowers are Black or African American and just 13 percent of joint borrowers are Black or African American. Male and joint borrowers have a higher average loan amount than female borrowers, and White borrowers have a higher average loan amount than Black or African American borrowers.

Table 41: Lending Activity by Derived Race and Sex, Mobile County, 2021

Race	Female	Male	Joint	Sex Not Available
White	3,679	5,947	5,167	66
Black or African American	2,049	1,756	868	20
Asian	124	262	113	3
American Indian or Alaska Native	51	103	21	2
Native Hawaiian or Other Pacific Islander	5	23	2	2
2 or more minority races	19	24	4	
Joint	4	3	262	
Race Not Available	394	662	389	3,842

Source: HMDA (2021)

## 2. Loan Denials

In addition to overall application numbers, a closer look at denial rates per loan type, loan purpose, and borrower demographics helps to reveal potential disparities in the home lending market. Conventional loans represent the largest percent of denials across all loans and have the highest rate of denial within each of the loan types. Seventy-three percent of all denials were conventional loans, and 17 percent of conventional loans are denied.

Table 42: Loan Application Denials by Loan Type, Mobile County, 2021

Loan Type	Number of Applications Denied	Total Amount	Percent Denials within Loan Type	Percent of All Denials
Conventional	2,883	\$355,275,000	17%	73%
FHA	624	\$100,910,000	12%	16%
VA	407	\$74,125,000	12%	10%
USDA	53	\$10,545,000	9%	1%

Source: HMDA (2021)

Fifty-two percent of all denials came from applications by White applicants and 27 percent came from applications by Black or African American applicants. However, Black or African American applicants are denied at a higher rate (23 percent) than White applicants (14 percent). Although Asian borrowers, American Indian or Alaska Native borrowers, Native Hawaiian or Other Pacific Islander borrowers, or borrowers with two or more minority races represent a relatively small portion of total denials, these applicants have a higher rate of denial than White applicants. Similarly, Hispanic or Latino applicants have a denial rate of 19 percent.

Table 43: Total Denials by Derived Race and Ethnicity, Mobile County, 2021

Race/Ethnicity	Number of Applications Denied	Percent Denials within Group	Percent of All Denials
White	2,072	14%	52%
Black or African American	1,074	23%	27%
Asian	80	16%	2%
American Indian or Alaska Native	56	32%	1%
Native Hawaiian or Other Pacific Islander	5	16%	0.1%
2 or more minority races	12	26%	0.3%
Joint	46	17%	1%
Race Not Available	620	12%	16%
<b>Ethnicity</b>			
Hispanic or Latino	99	19%	2%

Source: HMDA (2021)

In addition to general denial rates based on the loan type, loan purpose, and borrower characteristics, an assessment of the primary reasons provided for application denials helps to understand potential

barriers keeping borrowers from accessing homeownership opportunities. In 2021, the top reasons for loan denial in Mobile County were debt-to-income ratio, credit history, and collateral. Credit history impacted loan denial for 40 percent of Black or African American borrowers, 54 percent of American Indian or Alaska Native borrowers, and 50 percent of borrowers having two or more minority races. Unverifiable information impacted 20 percent of loan denials for Native Hawaiian or Other Pacific Islander borrowers.

Table 44: Primary Reason Provided for Denial by Derived Race and Ethnicity, Home Purchases, Mobile County, 2021

	White	Black or African American	Asian	American Indian or Alaska Native	Native Hawaiian or Other Pacific Islander	2 or more minority races	Joint	Hispanic /Latino
Debt-to-income ratio	23%	23%	29%	18%	20%	17%	20%	24%
Employment history	2%	2%	3%	0%	0%	0%	0%	2%
Credit history	38%	40%	30%	54%	20%	50%	46%	36%
Collateral	10%	6%	10%	5%	40%	17%	7%	13%
Insufficient cash	2%	2%	5%	0%	0%	0%	2%	0%
Unverifiable Information	4%	4%	1%	0%	20%	0%	4%	3%
Credit application incomplete	13%	13%	13%	9%	0%	0%	4%	14%
Mortgage insurance denied	0%	0%	0%	0%	0%	0%	2%	0%
Other	9%	10%	10%	14%	0%	17%	15%	7%

Source: HMDA (2021)

### 3. Summary

Based on HMDA data, recent lending activity does not reflect the racial or ethnic composition of the area. Black or African American and Hispanic borrowers are underrepresented, and White borrowers are overrepresented in the local market. Moreover, denial rates by race or ethnicity are disproportionately impacting communities of color.

Debt-to-income ratio, credit history, and collateral are the main reasons for loan denials in Mobile County. Other factors, including employment history, unverifiable information, and credit application incomplete are also a primary reason for loan denial in some cases.

When borrowers from communities of color can secure a loan, their average loan amounts are often lower than those from White borrowers. Such differences highlight the ongoing struggle for communities of color in securing adequate capital to access the home buying market in the area and ultimately build lasting family wealth. Looking ahead, Mobile will continue to monitor these lending patterns to tailor local programs to meet the needs of all residents and encourage greater financial security and homeownership opportunities in the jurisdiction.

## B. Real Estate Practices

Online listings are often the first impression or interaction that prospective renters or homebuyers have with a housing provider. By searching online for single-family and multi-family homes for rent or sale across Mobile neighborhoods, certain language and practices could serve to discourage some renters or buyers. In February 2023, there were 696 homes listed on Redfin and 826 homes listed on Zillow for sale in Mobile. There were 127 rental listings on Zillow and 79 on Redfin. A variety of housing types and list prices were chosen to review language and practices directed at prospective tenants or homebuyers.

### **Investor-focused listings**

Some listings in Mobile target investors willing to purchase a property as-is. A listing for a single-family home on N Creek Circle Drive states, “This property is a fixer upper in need of complete renovation. Great buy for investor looking for a fix and flip.” Another listing for a single-family home on Glenwood Street states, “Although a new roof is needed, the home is located on a street with many renovations, making it a wise investment. Don’t miss out on this opportunity to turn this property into your dream home or a profitable rental investment.” This limits the availability of housing for non-investor buyers or buyers who do not have the capital or time to renovate the property.

### **Rental applications and fees**

Many rentals require non-refundable lease application fees, deposits, and monthly pet fees that may be prohibitive to some renters. A listing for an apartment for rent on S University Boulevard requires a \$500 deposit fee and \$25 monthly pet fee. There is also a two-pet maximum and a 50 lb. weight limit for pets. Some rental units do not allow any pets. Another listing for a townhouse for rent on Cody Road states, “Deposit \$1200. Application Fee per applicant \$50. Administration Fee (lease signing fee) \$100. Pet Fee \$250 and approval from owner.” Upfront, non-refundable fees may present additional challenges to prospective renters.

### **Income minimums and housing voucher rejection**

Some rental units in Mobile require documentation of income and background checks to qualify. Further, some rentals explicitly do not accept housing vouchers. One listing for an apartment unit on Old Military Road states, “Must have documented income of \$2,400 a month, no exceptions. SORRY No Section 8. No Pets, No Smoking, must pass background and credit check.” Another rental listing for a single-family home on Bishop Lane states, “\$2,000 security deposit. Credit check (\$75 fee) and references. Minimum 650 credit score. No HCV. No SEC 8.” These limitations exclude prospective renters using housing vouchers in an already limited rental market.

## XII. Impediments to Fair Housing Choice

The HUD Fair Housing Planning Guide defines impediments to fair housing choice as:

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices.”
- “Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.”<sup>76</sup>

There are three main components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a federally protected class.
3. An impediment must be caused by an “action, omission, or decision.”<sup>76</sup>

Some of the identified potential barriers, or symptoms of barriers to housing choice, may be linked to one or more federally protected classes or to a particular action, omission, or decision. HUD’s definition of an impediment to fair housing choice does not specify responsible actors for the actions, omissions, or decisions taken, so in many cases, the local government may not be the responsible actor. It is also sometimes not feasible to identify an original responsible party or a specific action, omission, or decision, but quantitative or qualitative evidence could indicate one or many contributed to the impediment. This report is designed to identify as many potential impediments as possible and offer ways for the city government or its partners to address challenges, regardless of the original cause or responsible party.

Additionally, some potential barriers do not necessarily fall within HUD’s definition of “impediment” or require more in-depth research but have been noted in this document to provide context and additional information regarding current fair housing conditions in the City of Mobile.

### A. Impediments

The following impediments are presented in no particular order and without additional weighting. Where appropriate, references to previous sections are included for more context on relevant data and insights.

#### 1. Lack of Access to Affordable Housing

In Mobile, 32 percent of households are cost burdened, or spend more than 30 percent of their income on housing. Further, 11.5 percent of residents are severely cost burdened, or spend more than 50 percent of their income on housing. Of severely cost burdened households, 33.1 percent are Black or African American households. A lack of supply of affordable housing makes it difficult for low-income households in Mobile to access housing that does not impose a cost burden.

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<sup>76</sup> U.S. Department of Housing and Urban Development. Fair Housing Planning Guide, Volume 1. Available at: <https://www.hud.gov/sites/documents/FHPG.PDF>.



Public and subsidized housing in Mobile is in short supply, and the Mobile Housing Authority currently plans to demolish the Thomas James Place, R.V. Taylor Plaza, and Boykin Tower public housing developments. The current count includes 285 units in these buildings that remain occupied but are to be vacated before demolition, reducing the total number of operational public housing units to 1,078 by 2026. This is about half of all public housing units in Mobile. With thousands of households on the waiting list for public housing units and vouchers, supply of affordable housing is not able to meet demand. The MHA does not currently project an increase the number of affordable units available to households.<sup>77</sup> A proposed affordable housing development in downtown Mobile was struck down by City Council in 2022. The proposed development would have included 95 affordable housing units.<sup>78</sup> Further, from stakeholder interviews, there is a lack of regional coordination around public and subsidized housing to keep people housed and to house eligible individuals and families quicker.

In the private sector, there are fewer landlords willing to accept Housing Choice Vouchers. Other barriers, including rental application fees and income minimums, decrease the availability of accessible affordable housing for renters. From stakeholder interviews and the community survey, there is a lack of knowledge among residents as to how to file a fair housing complaint and how to get access to useful, understandable housing resources. In the community survey, 16 respondents felt they had been discriminated against when looking to rent or buy in Mobile, but only three of those respondents reported it – by calling the Center for Fair Housing, the Mobile Housing Authority, and reporting it to the City of Mobile’s Mayor’s office.

## **2. Aging and Deteriorating Housing Stock Reduces Access to Safe and Healthy Living Conditions**

Some neighborhoods, particularly low- to moderate-income neighborhoods and predominantly Black or African American neighborhoods, have seen a lack of private and public investment, leading to an increase of deteriorated and abandoned properties. Concurrently, there has been a lack of City incentives for opportunities to develop infill housing or revitalize vacant or dilapidated properties in low-income neighborhoods.

Comprehensive historic district regulations in Mobile currently hinder the ability to redevelop or repair vacant, deteriorating housing in those districts. Property owners in these districts must have all exterior work and amenities to their property approved by the City’s review boards, which presents a challenge to fair and affordable housing by adding major time and costs to address the historic design standards.

Older housing stock can also increase exposure to environmental health hazards like lead, poor air quality, and vulnerability to flood events. Mobile is in the 80-90<sup>th</sup> percentile for diesel particulate matter and 90-95<sup>th</sup> percentile for the air toxics respiratory hazard index in the U.S. Further, exposure to environmental pollutants will likely increase with the relocation of the airport to downtown. Additionally, most R/ECAPs have 1 percent annual chance Special Flood Hazard Areas within the tract boundaries. This further threatens aging housing stock that may not be fortified to withstand worsening flood events.

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<sup>77</sup> From interview with Mobile Housing Authority staff. January 23, 2023.

<sup>78</sup> Alabama Media. June 21, 2022. Mobile City Council unanimously votes against allocating money to Gayfers affordable housing development. Available at: <https://www.al.com/news/mobile/2022/06/mobile-city-council-unanimously-votes-against-allocating-money-to-gayfers-affordable-housing-development.html>.

### **3. Lack of Access to Accessible Housing**

Special living accommodations for persons with disabilities should be considered as persons with disabilities may face challenges with finding housing that is physically accessible. In Mobile, 6.3 percent or 11,029 residents have independent living difficulties, and there is a limited stock of housing that is accessible to persons with disabilities. Stakeholder interviewees shared a perception of a lack of availability of accessible public or subsidized housing and a lack of assistance for making housing accessibility modifications.

In the community survey, respondents noted that there is limited availability of accessible housing advertised in the City of Mobile. Adequate public infrastructure also came up as an impediment for persons with accessibility challenges. Twenty-four percent of respondents agreed or strongly agreed that they were limited in mobility because of broken sidewalks, no sidewalks, or poor street lighting in their neighborhood. The City has inventoried sidewalks, created ADA transition plans, and funded repairs. In the 2022-2026 Capital Improvement Plan, the ADA Sidewalk Modification Program is budgeted for \$5.5 million. This is in addition to sidewalk repair and expansion that is included within other infrastructure projects.<sup>79</sup> While sidewalk infrastructure is improving around the city, there is still more improvement needed.

### **4. Geographic Segregation/Unequal Access to Opportunities**

Lower wages, lack of access to reliable transit, and inadequate educational opportunities for communities of color and federally protected classes impact housing stability, social mobility, and potential displacement. Of households in Mobile, 47 percent of households have incomes below 80 percent of the area median income. Further, 17 percent of households are very-low-income (under 30 percent median household income) and 14 percent are low income (30-50 percent median household income).

From stakeholder interviews, many residents identified challenges with accessing training or education necessary for employment at available high-paying jobs and industries in Mobile. Many currently growing sectors, which include aviation, shipbuilding and repair, advanced manufacturing, logistics, healthcare, engineering, construction, and business, require specialized education and skills. Additionally, neighborhoods with affordable housing are often located far from job centers. Unreliable bus transit also makes it difficult to travel between work and home for low-income individuals.

The racial/ethnic dissimilarity index is a measure of geographic segregation wherein 0 is complete integration and 100 is complete segregation. The dissimilarity index “measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group”.<sup>80</sup> According to the dissimilarity index, a measure of geographic segregation, the segregation by race of Mobile neighborhoods decreased from 1990 to 2010 and then increased between every non-white racial group compared to white racial group in 2020 (see Section VI.A). The largest dissimilarity (disparity) was between Black and White Mobile residents. Geographic segregation can affect the ability of Federally protected classes to access affordable and safe housing and employment. The access to

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<sup>79</sup> Map for Mobile. 2022-2026 Capital Improvement Plan. Available at: [https://mapformobile.org/wp/wp-content/uploads/2022/02/CIP\\_2022-2026FINAL-220117-web.pdf](https://mapformobile.org/wp/wp-content/uploads/2022/02/CIP_2022-2026FINAL-220117-web.pdf)

<sup>80</sup> Census Scope, About Dissimilarity Indices. Available at: [https://censusscope.org/about\\_dissimilarity.html](https://censusscope.org/about_dissimilarity.html)

opportunity indices reveal that Black or African American residents have the worst school opportunity and exposure to environmental health hazards, while all racial groups had fairly low scores for transit access and transportation costs (see Section VI.B).

From stakeholder interviews, there are disparities in public and private investments in low-income neighborhoods, resulting in neighborhoods that are more vulnerable to indoor and outdoor environmental hazards, like lead exposure, air pollution, and flooding. For example, low-income populations in low-lying areas are more susceptible to sea-level rise and flash flood events. Further, water and sewer lines in Mobile are often impacted during flooding events and can lead to sewage overflow. Other public infrastructure like roadways are often not well maintained in low-income neighborhoods, which creates additional challenges for recovery.

### **5. Home Lending Disparities Reduce Access to Capital**

Federally protected classes face challenges to accessing home lending opportunities and can face private market housing discrimination. In 2021, 71 percent of loans in Mobile County were given to White borrowers and 22 percent of loans were given to Black or African American borrowers. Given that approximately 57 percent of Mobile County residents are White and 36 percent are Black or African American, White borrowers make up a disproportionate number of loan recipients compared with Black or African American borrowers. The average loan amount for Non-Hispanic White borrowers was \$179,057, while the average loan amount for Non-Hispanic Black or African American borrowers was \$158,954. For loan denials, Black or African American applicants are denied at a higher rate (23 percent) than White applicants (14 percent). Such discrepancies highlight a disparity in access to capital for communities of color in Mobile County, limiting access to homeownership, and in turn long-term wealth and stability.

Stakeholder interviews also indicated that the statistics might not reflect the complete disparity between White and minority loan applicants because most data only reflect those potential borrowers who officially submitted an application for credit—but not those who went through the process of collecting documents and data only to be informally rejected before submitting an application.

### **6. Restrictive or Limited Local Land Use Regulations and Policies Limit Housing Development and Redevelopment**

While the City has made efforts in recent years to update its land use regulations to allow for more housing, there are some existing challenges that limit access to fair housing. A recent update to the City's Unified Development Code (UDC) encourages mixed-use projects, which allow for greater density and thus can increase the supply of affordable housing, by allowing more by-right development. Further, the code allows more flexibility in lot size by allowing development on small lots that were previously nonconforming. Flexibility in lot size encourages development of smaller lots, which can result in more affordable housing. However, Residential R-1, which allows for single-family development, is the most widespread zoning classification in the city. Single-family zoning may limit the type and availability of additional housing in high opportunity neighborhoods because of low density and greater relative development and resale cost.

The City recently piloted a neighborhood toolkit to aid neighborhood groups in proactively planning and envisioning the future of their neighborhood, including potential housing development and opening

opportunities for residents to advocate directly for wider housing choices. This toolkit planning process is expected to be deployed in other neighborhoods following the pilot in Toulminville. However, stakeholder interviews indicated that there is a lack of comprehensive community revitalization strategies for the city. Comprehensive community revitalization strategies would engage the whole community in identifying housing opportunities and needs to advance fair housing access across neighborhoods in Mobile.

The City of Mobile is a coastal city, making it vulnerable to sea level rise and susceptible to extreme weather events. The areas that are most likely to be impacted by rising sea levels include several of the most economically vulnerable neighborhoods in Mobile, including Oakdale, Baltimore, Owens, Fisher, and Gorgas. The majority of low-and moderate-income neighborhoods are near Mobile Bay and a network of waterways that feed into the bay. Many of the areas of highest flood risk overlap with Racially and Ethnically Concentrated Areas of Poverty (R/ECAPS). Additionally, public infrastructure like roadways and sewer infrastructure are often not well maintained in low-income neighborhoods according to stakeholder interviews, creating additional challenges for vulnerable communities during a natural hazard event.

Mobile is likely losing naturally occurring affordable housing, especially rental units, to both prohibitive regulations which create burdens for repair and lax regulations on rentals which lead may be leading to the conversion of long-term housing stock to short-term rentals. Comprehensive historic district regulations in Mobile currently may also be hindering the ability to redevelop or repair vacant, deteriorating housing in those districts. Strict regulations and requirements in historic districts create additional burdens and financial challenges for property owners to bring their property to commerce. Through the community survey, residents voiced concern over the large amount of vacant or derelict houses, as well as an increase of housing units being converted to short-term rental units, which increase overall market rents by driving up potential income values and removing long-term rental stock.

## **7. Exposure to and Remediation of Environmental Hazards**

Older housing stock can also increase exposure to environmental health hazards like lead, poor air quality, and vulnerability to flood events. Beyond older housing stock, exposure to environmental hazards from poor outdoor air quality is more prevalent in low-income neighborhoods. Mobile is in the 80-90<sup>th</sup> percentile for diesel particulate matter and 90-95<sup>th</sup> percentile for the air toxics respiratory hazard index in the US. Many affordable housing units in Mobile are located near high-traffic areas, which increases residents' exposure to traffic-related particulate matter and pollution. Further, exposure to environmental pollutants will likely increase with the relocation of the airport to downtown. Mobile is also vulnerable to flooding, and many of the areas of highest flood risk are R/ECAP tracts. Additionally, Mobile is known to have high levels of naturally occurring arsenic in the soil, which is often prohibitively expensive to remediate, limiting housing choice where it is present.

### **B. Other Contributing Factors**

Some factors identified through research and interviews might impact fair housing choice but do not necessarily meet the definition of an impediment as defined by HUD. This section notes some of those most discussed during stakeholder interviews and mentioned in responses to the public survey. These other factors might warrant a response that goes beyond housing policy or is fundamentally rooted in

fair housing choice. These considerations are meant to invite further discussion about these important acute and structural issues.

### **1. Community Opposition to Affordable Housing**

Community resistance to change or opposition to affordable housing can slow or stop new affordable housing development, particularly multifamily and rental units. A proposed affordable housing development in downtown Mobile was struck down by City Council in 2022. The proposed development, which faced significant community opposition, would have included 95 affordable housing units.<sup>81</sup> Comprehensive community engagement and consideration of affordable housing in land use planning are necessary to mitigate community opposition.

### **2. Lack of Coverage and Availability of Public Transportation**

Neighborhoods with affordable housing are often located far from job centers. Safe, reliable public transit is necessary for those living in affordable units to access employment in Mobile. Further, a lack of bus coverage in the city will limit housing options for those that rely on public transit for work and other activities. Stakeholder interviews were nearly universal in noting the limited schedule, coverage, and reliability of buses in Mobile. Affordable housing developments should consider connections to public transit to connect residents to employers, community amenities, and other resources (see Section III.A and IX.C).

### **3. Lack of Regional Coordination**

A lack of regional coordination of affordable housing resources limits the reach of the housing program and efficiency with which eligible people can be housed. If public and subsidized housing efforts are better coordinated at the regional level, including with the Mobile Housing Authority, Mobile County government, local fair housing organizations, and other housing organizations operating within Mobile County and the metropolitan area, the consolidation of efforts can help overcome jurisdictional delivery delays and barriers to housing. Regional coordination can include the development of a consolidated waiting list for assisted housing across the region and the creation of a centralized and consolidated applicant database for all assisted housing programs.<sup>82</sup> Regional efforts should also include the coordination of other factors that influence stable housing and economic mobility, including access to jobs, schools, transportation, and social services.

### **4. Public Confusion About Housing and Community Development Programs and How to Access Resources**

Stakeholder interviews and community surveys identified a perception of a lack of consistent and timely access to housing resources and information for households and individuals in Mobile. While the City has always met its HUD requirements for noticing and public participation, difficulty in harmonizing housing resource communications across external organizations might be contributing to a perception of a lack of consistent information. Additionally, the local newspaper recently changed from daily

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<sup>81</sup> Alabama Media. June 21, 2022. Mobile City Council unanimously votes against allocating money to Gayfers affordable housing development. Available at: <https://www.al.com/news/mobile/2022/06/mobile-city-council-unanimously-votes-against-allocating-money-to-gayfers-affordable-housing-development.html>.

<sup>82</sup> U.S. Department of Housing and Urban Development. Fair Housing Planning Guide, Volume 1. Available at: <https://www.hud.gov/sites/documents/FHPG.PDF>.

printing to online only, which may impact who is able to access local information and when. Without a daily printed newspaper and housing resources or deadlines from City and other housing agencies and organizations sometimes posted in few locations with limited lead times, necessary information about housing and community development programs and resources might not always reaching the intended audiences consistently. Interviewed stakeholders identified a need to distribute information at various locations and meet people in their own communities and neighborhoods. Interviewees also repeated a recommendation for City Council members to hold office hours and public meetings in different neighborhoods to reach a broader group of residents and voices.

Additionally, there is limited fair housing outreach and enforcement. There are few organizations involved in fair housing outreach and advocacy in Mobile, and fair housing organizations face a lack of resources and struggle to coordinate efforts. From the community survey, while sixteen respondents felt they had been discriminated against when seeking housing, only three respondents communicated with the Center for Fair Housing, Mobile Housing Authority, or Mayor. Mobile residents may not know their rights or course of action in cases of discrimination.

Updates to the City’s website to act as a housing resources clearinghouse, including clear instructions about how to report potential fair housing violations, could help mitigate this problem. However, for those without regular access to online information, other communications media will likely be necessary.

### C. Recommended Actions

The recommendations presented in this section are intended to help guide the City and its partners toward reaching fair housing goals in Mobile over the next five years by addressing the impediments in the previous section. The far-right column in the matrix below, Existing Actions, highlights a sample of the potential leverage that already exists to help facilitate some of the recommendations, but these should not be considered an exhaustive list of the work that the City and related partners are already doing to support fair housing and community development.

Impediment #1: Lack of Access to Affordable Housing				
	Recommendation	Responsible Agency	Timeframe	Existing Actions
1.1	Encourage the MHA to create a relocation plan whenever public housing is scheduled for demolition or rehabilitation and work with the MHA to conduct outreach and access to the plan.	Mobile Housing Authority (MHA) Neighborhood Development	1-3 years	
1.2	Explore feasibility to expand City housing code to include protections for “source of income” from discrimination that bars landlords from refusing to rent based on	City Council	1-2 years	Ordinance 28-050, passed November 8, 2022 <sup>83</sup>

<sup>83</sup> An Ordinance to Adopt a Housing Code for the City of Mobile, 28-050 November 8, 2022  
<https://www.cityofmobile.org/uploads/22110901134528-050.pdf>



	lawful source of income to increase acceptance of HCVs.			
1.3	Explore feasibility to update zoning regulations to allow group living accommodations (5 or more persons), emergency shelters, and elderly housing by-right in more districts.	Planning and Zoning Division	1-2 years	Unified Development Code (UDC)
1.4	Recommend updating the future land use plan to allow for more missing middle development and density around job centers, not just downtown.	Planning and Zoning Division	2-5 years	UDC, Map for Mobile
1.5	Explore feasibility of providing development incentives for affordable housing in both low-income areas that need investment and areas of high opportunity.	Neighborhood Development, MHA	2-5 years	Map for Mobile, Neighborhood toolkit
1.6	Explore opportunities to leverage funding or partner with state and foundations to support production of affordable housing.	MHA, Neighborhood Development	2-3 years	HOME-ARP as leverage with tax credits for proposed shelter development
1.7	Improve regional coordination between the City, Mobile Housing Authority, Legal Services Alabama, Center for Fair Housing, Mobile Continuum of Care partners, and service partners to prioritize development of public and subsidized housing.	Neighborhood Development	2-3 years	Continuum of Care 10-year plan, partnerships with current service providers
1.8	Explore feasibility of incentivizing development of apartments with 3 or more bedrooms via development incentives such as fee waivers or expedited permitting.	Planning and Zoning Division	1-2 years	UDC update
1.9	Work with community organizations and explore opportunities to seek funding to expand and advertise utility assistance programs, especially for seniors and fixed-income homeowners.	Neighborhood Development, local community organizations	2-3 years	Use ARP-funded utility assistance program as model
1.10	Explore feasibility of adopting short term rental legislation that will balance the needs of residents and the City's affordable housing stock	Planning and Zoning Division	2-3 years	UDC update



	as traditional rental or owner-occupied units.			
1.11	Leverage the primary single-family zoning category (R-1 Residential) for affordable homeownership opportunities in coordination with the Housing Choice Voucher (HCV) Program for homeownership.	Neighborhood Development, MHA, Planning and Zoning Division	1-2 years	UDC update

<b>Impediment #2: Aging and Deteriorating Housing Stock Reduces Access to Safe and Healthy Living Conditions</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
2.1	Explore opportunities to leverage all available funding sources to expand home repair efforts to offer more loans and/or grants.	Neighborhood Development	3-5 years	CDBG Home Rehabilitation Program
2.2	Pursue better coordination with the Mobile Community Action Agency in their endeavors related to home rehabilitation.	Neighborhood Development, Mobile Community Action Agency	2-3 years	CDBG Home Rehabilitation Program
2.3	Consider using the Code Enforcement Division to inspect tenant-occupied properties that are flagged for unhealthy/unsafe living conditions, such as mold, structural integrity, open to elements. Moreover, explore policies that provide the ability for tenants to withhold rent under circumstances of unsafe/unhealthy living situations.	Code Enforcement Division, Legal Department, Neighborhood Development	1-2 years	Code enforcement
2.4	Consider expedited permit review of repairs to vacant or blighted housing units in historic districts to bring available housing back to commerce.	Historic Development, Planning and Zoning Division, Permitting	1-2 years	Blight survey and blight removal

<b>Impediment #3: Lack of Access to Accessible Housing</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
3.1	Pursue a qualified nonprofit to design a grant program for landlord or tenant applicants to apply for accessibility upgrades.	Neighborhood Development, local nonprofit organizations	2-5 years	CDBG Homeowner Rehabilitation Program
3.2	Develop and promote technical assistance guidance about	Planning and Zoning Division, Permitting,	1 year	

	accessibility standards and requirements for developers and property owners, particularly for multi-family developments.	Local disability advocacy groups		
3.3	Research the feasibility of developing incentives, based on available funds, for projects that include accessible design elements based on Universal Design, <sup>84</sup> such as wide doorways, ramps, lever door handles, flush thresholds, and audible and visual notification systems.	Planning and Zoning Division, Permitting	2-3 years	HOME Affordable Housing Development
3.4	Develop and promote resources for residents to understand and utilize reasonable accommodations requests and/or file an ADA complaint.	Neighborhood Development, Communications, Center for Fair Housing	1 year	

<b>Impediment #4: Geographic Segregation/Unequal Access to Opportunities</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
4.1	Continue supporting City's ADA infrastructure upgrade plan to ensure compliance and identify areas of need for improved public infrastructure (sidewalks, streetlights) in the city.	Engineering Department, Public Works, Neighborhood Development	2-3 years	ADA infrastructure upgrade plan
4.2	Consider setting aside funding in the Capital Improvement Plan to continue expanding parks in the eastern side of the city.	Parks and Recreation, Public Works	2-5 years	Current efforts to expand greenways, Capital Improvement Plan
4.3	Provide information on state and federal programs that reduce the cost of broadband service for low-income residents and coordinate when possible with Alabama Public Service	Neighborhood Development	1-2 years	Affordable Connectivity Program <sup>85</sup> , Capital Projects Fund <sup>86</sup>

<sup>84</sup> National Association of Home Builders. What is Universal Design? Available at: <https://www.nahb.org/other/consumer-resources/what-is-universal-design>

<sup>85</sup> Internet for All. Affordable Connectivity Program. Available at: <https://www.internetforall.gov/program/affordable-connectivity-program>.

<sup>86</sup> Internet for All. Capital Projects Fund. Available at: <https://www.internetforall.gov/program/capital-projects-fund>

	Commission representatives to highlight the need to expand broadband coverage and access to those receiving housing assistance.			
4.4	Work with the Mobile Metropolitan Planning Organization on transit planning efforts to evaluate current bus routes to ensure that concentrations of low-income households are connected to jobs, healthcare, recreation, and other amenities.	Wave Transit, Mobile Metropolitan Planning Organization, Neighborhood Development	3-6 years	Current efforts to expand transit
4.5	Expand biking infrastructure throughout the city, especially connecting job centers and neighborhoods.	Public Works, Traffic Engineering, ALDOT	3-6 years	Capital Improvement Program, Current efforts to expand greenway
4.6	Consider opportunities to work with Legal Services to expand access to fair housing resources by facilitating discussions in different neighborhoods.	MHA, Legal Services	1 year	
4.7	Explore opportunities to work with nonprofits to integrate wraparound supportive services into workforce development programs, including job training, job placement, and childcare assistance.	Neighborhood Development, MHA, local nonprofit organizations	1-2 years	Existing workforce development programs, Office of Supplier Diversity training and outreach, Bishop State Community College, Mobile Area Workforce Alliance
4.8	Recommend holding hybrid meetings regarding fair housing, virtual and in-person, and consider alternating location of in-person public meetings such as neighborhood libraries and community organizations to expand access	City Council, Neighborhood Development	6 months-1 year	City Council Meeting Live Stream, City use of social media, City Neighborhood Resource Center
4.9	Publish and advertise clear directions and contact information (through website postings, social media, bulletin boards, fliers) about how to report fair housing violations.	MHA, Center for Fair Housing, Legal Services Alabama	6 months-1 year	

Impediment 5: Home Lending Disparities Reduce Access to Capital				
	Recommendation	Responsible Agency	Timeframe	Existing Actions
5.1	Continue building relationships with financial institution to encourage investments and/or partnerships to support low-income neighborhoods through lending activities.	Neighborhood Development - Office of Supplier Diversity	1-2 years	Building Alabama Reinvestment
5.2	Work with MHA to develop resources and financial education for low- to moderate-income borrowers to help navigate the home buying process.	MHA, Neighborhood Development	1-2 years	City HoPE (Homeownership Provides Equity) Initiative
5.3	Continue engagement efforts between the Office of Supplier Diversity and the local lending community to encourage lenders to reinvest in areas with majority-minority populations, include FHA loans in their portfolios, and take HCVs into account when approving home loans.	Neighborhood Development - Office of Supplier Diversity	2-3 years	2023-2028 Consolidated Plan
5.4	Recognize (through social media, City website, newsletters) financial institutions with a record of supporting fair housing initiatives.	Mayor's Office, Neighborhood Development, Communications	1-2 years	

Impediment #6: Restrictive or Limited Local Land Use Regulations and Policies				
	Recommendation	Responsible Agency	Timeframe	Existing Actions
6.1	Recommend revision of zoning code to encourage development of, and access to, affordable housing options, such as, allow accessory dwelling units (ADUs) by right in more zoning categories, loosen setback and other site development standards in low-density zoning districts, and allow mixed-use and multi-family developments by right in more zoning districts.	Planning and Zoning Division, City Council, Planning Commission, Board of Zoning Adjustment	2-3 years	UDC, Neighborhood toolkit, 2023-2028 Consolidated Plan
6.2	Recommend density bonuses for 30 percent and 50 percent AMI	Planning and Zoning Division, Planning Commission	1-2 years	UDC

	affordable housing around job and transit centers			
6.3	Explore opportunities to increase coordination with City departments and City/Regional planning entities, as capacity and funding allows.	MHA, Neighborhood Development	1-2 years	2023-2028 Consolidated Plan
6.4	Continue to attempt to appoint representatives to the Planning Commission and Zoning Board of Adjustments that more accurately reflect the residents of the City in gender, race, ethnicity, and income level.	Mayor, City Council, Planning and Zoning Division	1-2 Years	Existing appointment procedure and applications to boards

<b>Impediment #7: Exposure to and Remediation of Environmental Hazards</b>				
	<b>Recommendation</b>	<b>Responsible Agency</b>	<b>Timeframe</b>	<b>Existing Actions</b>
7.1	Explore opportunities to strengthen building code standards to assess appropriate development and rebuilding standards in high flood risk areas.	Engineering, Planning and Zoning Division	2-5 years	The Building Code of the City of Mobile
7.2	Continue and consider expanding trainings with Bishop State at the City's nonprofit resource center to build local capacity and increase the number of local contractors that are certified in lead and asbestos abatement.	Neighborhood Development, Bishop State, SafeState Alabama, Permitting, Planning and Zoning Division, Mobile County Health Department	2-3 years	Contractor's College
7.3	Conduct a training for City staff and interested contractors about fortified construction, special flood hazard zones, the risks of flooding, and the impacts on property insurance.	Planning and Zoning Division, Environmental Services, Communications, Mobile County Health Department	6 months-1 year	
7.4	Provide technical assistance (webinars, resources on City website, social media) for homeowners on flood mitigation measures at home.	Planning and Zoning Division, Environmental Services, Stormwater Management	1-2 years	CDBG Homeowner Rehabilitation Program
7.5	Explore feasibility of developing indoor air quality standards for new	Planning and Zoning Division,	2-3 years	UDC, Map for Mobile

	<p>developments in proximity to high-traffic, polluting roadways. When possible, encourage more infill housing development away from major roadways to help deconcentrate housing away from pollution corridors.</p>	<p>Neighborhood Development</p>		
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## XIII. Appendix

### A. Stakeholder Interview Guide

**City of Mobile  
Department of Community and Housing Development  
Consolidated Plan & Analysis of Impediments**

#### Stakeholder Interview

Date:

Interviewer (Civix):

Interviewee (Stakeholder):

Organization:

Contact Information:

#### Interview Questions

**Introduction:** I am (*Introduce yourself*) with Civix. We are a grants consulting firm based in New Orleans and are working with the City of Mobile to develop their 5-year Consolidated Plan and Analysis of Impediments. Both of these reports are required by HUD as part of receiving CDBG, HOME and ESG grants, and look at the current conditions of housing and services and the community needs. The goal of these interviews is to hear about the experiences and challenges you are seeing in the community and with those your organization serves.

1. Please describe your organization's role/mission:
2. What populations does your organization serve? What are the primary programs/services the organization provides? (Follow ups: How many does [program] serve annually? Is there a waitlist? What are the needs for those served?)
3. What do you think are currently the most significant community needs?
4. Do community assets or challenges vary by neighborhood or subpopulation? If so, where or which communities face greater challenges? Lack of access to community assets?



5. What do you think are Mobile's greatest housing strengths?
6. What do you think are Mobile's greatest fair housing challenges?

#### *Review of Past (2017) Impediments*

1. How do you think the city did in addressing these impediments?  
What could/should they have done differently?
2. Which impediments do you think are still an issue today? Why? How?
3. How has the city changed in the past five years?
4. What impacts have been felt in fair housing since the pandemic?  
How has the pandemic affected the services you provide to communities?  
(What do you think is caused by the pandemic? What has been exacerbated by it? What did you see before?)

#### *New Impediments*

1. What other impediments (challenges) to fair housing currently exist in Mobile?  
Who is impacted by these impediments?  
Do you have data available to support these impediments?

#### *Potential Prompts*

- Evictions
  - o Causes?
  - o Ability to address?
- Access to:
  - o transportation
  - o public services
  - o open space
  - o job opportunities
  - o housing

- Homeownership
    - Rental
    - Public housing
  - Challenges specific to certain subpopulations?
  - Fair housing enforcement
  - Accessibility (disabled or elderly populations)
2. What actions could/should the City of Mobile take to address these impediments?
3. Do you have any background data/reports/information that you think would be helpful to illustrate fair housing conditions or factors contributing to impediments?

*Prompts:*

*Local initiatives taking place*

4. Who else should we meet with?

**Closing:**

Thank you very much for your time. Please feel free to reach out to me if you have any questions or other thoughts you would like to share on your work. We would appreciate it if we could share a link to the community survey (once posted) for you to share with your network and clients as appropriate.

**B. Community Survey Results**

To fully understand community need, surveys were made available to any resident who lived in Mobile, was connected to Mobile, or wanted to live in Mobile. The survey was open between February 1 and February 21, 2023. The survey was distributed by interviewed stakeholders and shared on City of Mobile social media.

137 people took the survey. Of the respondents who answered, 114 people responded that they lived in the City of Mobile, and 22 responded that they did not. The table below shows the zip codes of the people who took the surveys, and the chart below shows the relationship respondents had to the City of Mobile. Most respondents lived in Mobile, and an additional 8 percent want to live in Mobile. Some of the other options included working with the community from Mobile, or having family members who attended the public schools.

*Table 45: Please identify the zip code for where you live:*

Responses	Number of responses
36604	16
36608	16
36606	14
36695	12
36605	11
36609	9
36693	8
36602	7
36603	6
36619	3
36618	3
36607	3
36617	3
36610	2
36526	2
36575	2
36611	2
36544	2
36613	2
36612	1

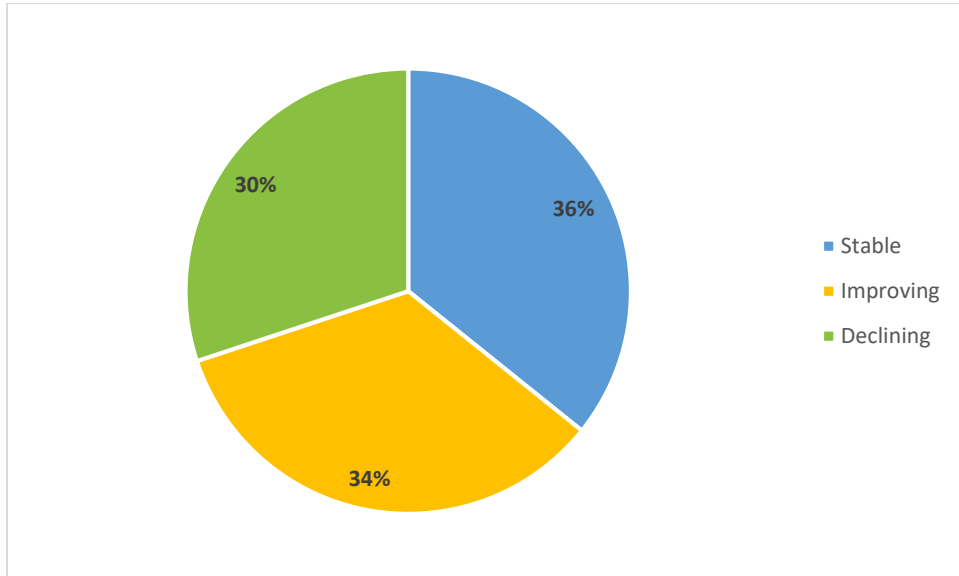
36523	1
36582	1
36505	1
96582	1
36541	1
36509	1
n/a	1
36576	1
36545	1
35405	1
36537	1

Table 46: Connection to Mobile. "Please check all that apply:"

Answer Choices	Percentage	Number
I live in Mobile	83%	115
I work in Mobile	76%	105
I have children in Mobile Public Schools	14%	20
I regularly participate in Mobile recreational, cultural, or leisure activities	59%	82
I attend school in Mobile	3%	4
I want to live in Mobile	8%	11
Other (please describe)	11%	15

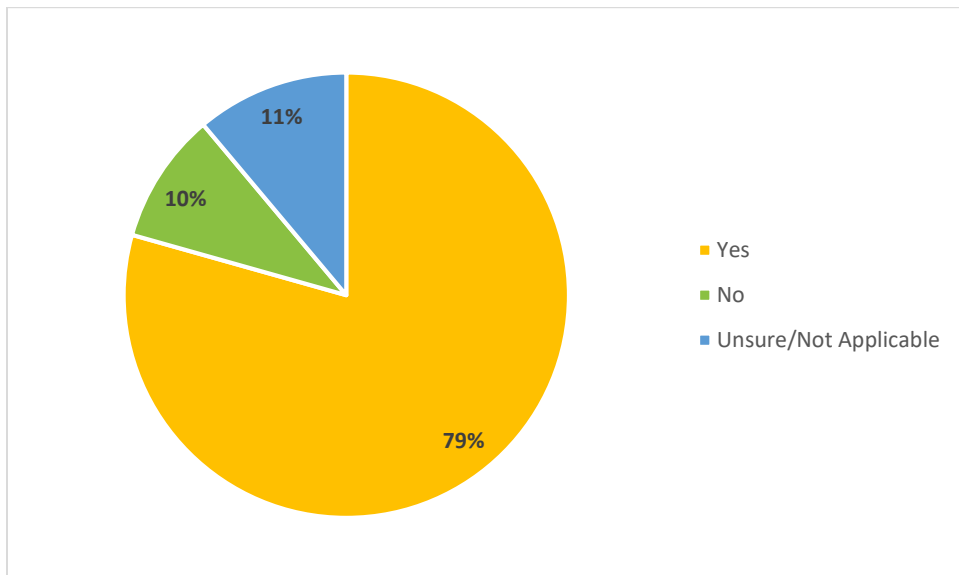
Survey respondents thought that the physical condition of the public space in their neighborhood was mostly stable (36 percent) or improving (34 percent), as opposed to 30 percent who thought it was declining. The open-ended responses included a majority concern around adequate sidewalks—“we have trails in the dirt for sidewalks”—and moderate concern around street maintenance.

Figure 23: Do you think the physical condition of the public space in your neighborhood (streets, sidewalks, parks) is:



Most survey respondents (70 percent) perceived economic development/job creation to be a critical issue. Respondents commented that they wanted higher wage jobs, better housing to attract job opportunities, better education and public school system, increased workforce training, and opportunity for youth. Some comments also included concern about hiring local over transplants and specific concern for the lack of opportunity in Cottage Hill, Azalea, Plateau, and Africatown.

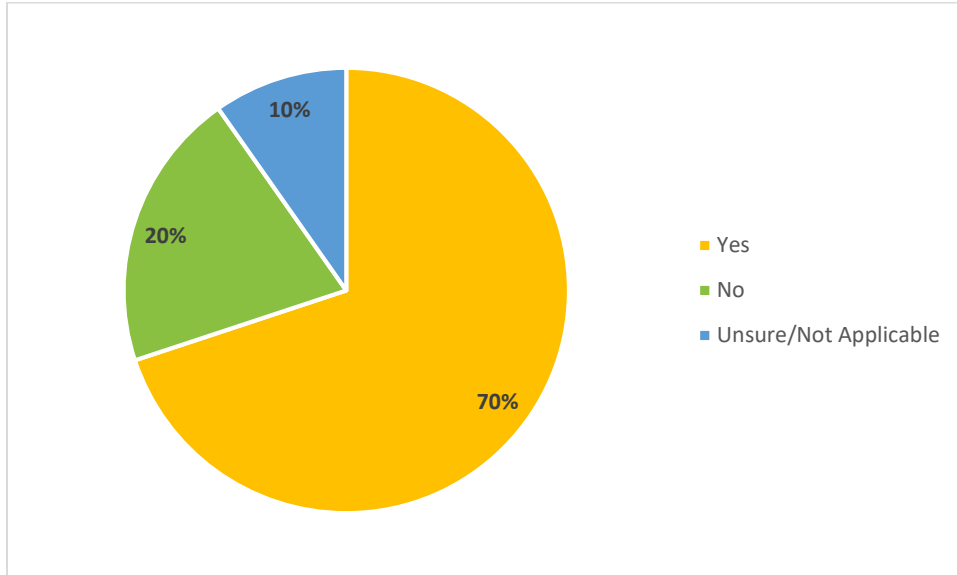
Figure 24: Do you perceive economic development/job creation to be a critical issue in the City?



Most respondents felt safe in their immediate neighborhood (70 percent), while 20 percent of respondents did not feel safe. It should be noted that survey respondents had disproportionately higher income than the general Mobile population, and many of the open-ended responses stipulated crime as

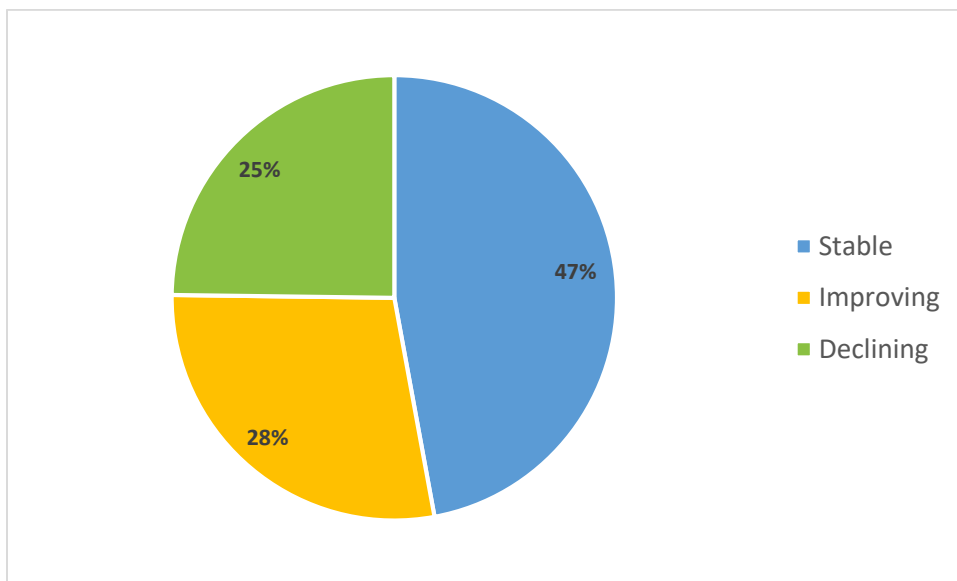
a concern. Many of the open-ended responses mentioned gun crime, feeling safe only in the immediate neighborhood but being unwilling to venture further out, and issues around car theft.

Figure 25: Do you feel safe in your immediate neighborhood?



While 47 percent of respondents believe that the physical condition of housing in their neighborhood is improving, a quarter of respondents thought it was declining. Many of the open-ended responses to also cited declining physical condition, as well as house flipping and problems with mold in rental housing.

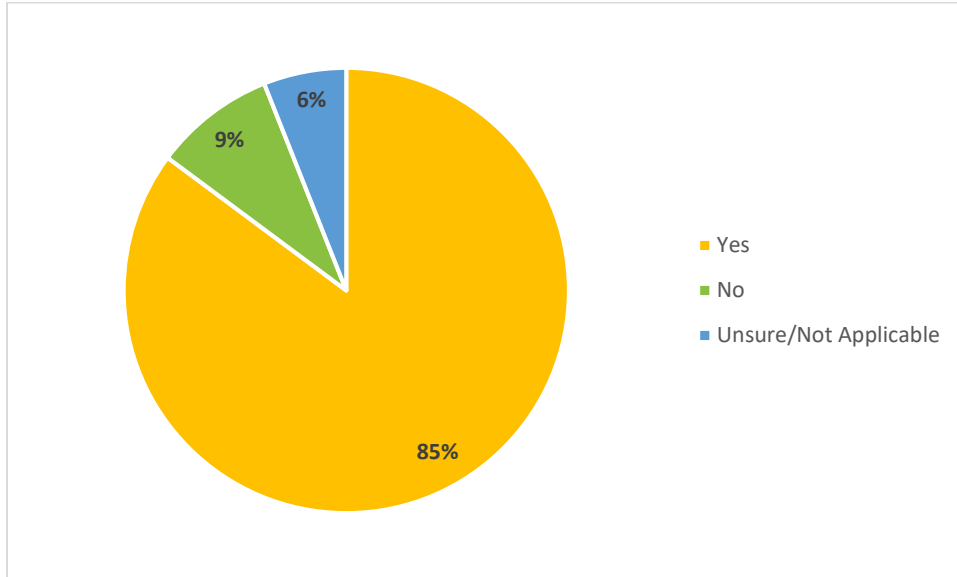
Figure 26: Do you think the physical condition of housing in your neighborhood is:



The majority of survey respondents (86 percent) thought abandoned or foreclosed properties are a critical issue in the City. Many of the open-ended comments called for abandoned properties to be torn

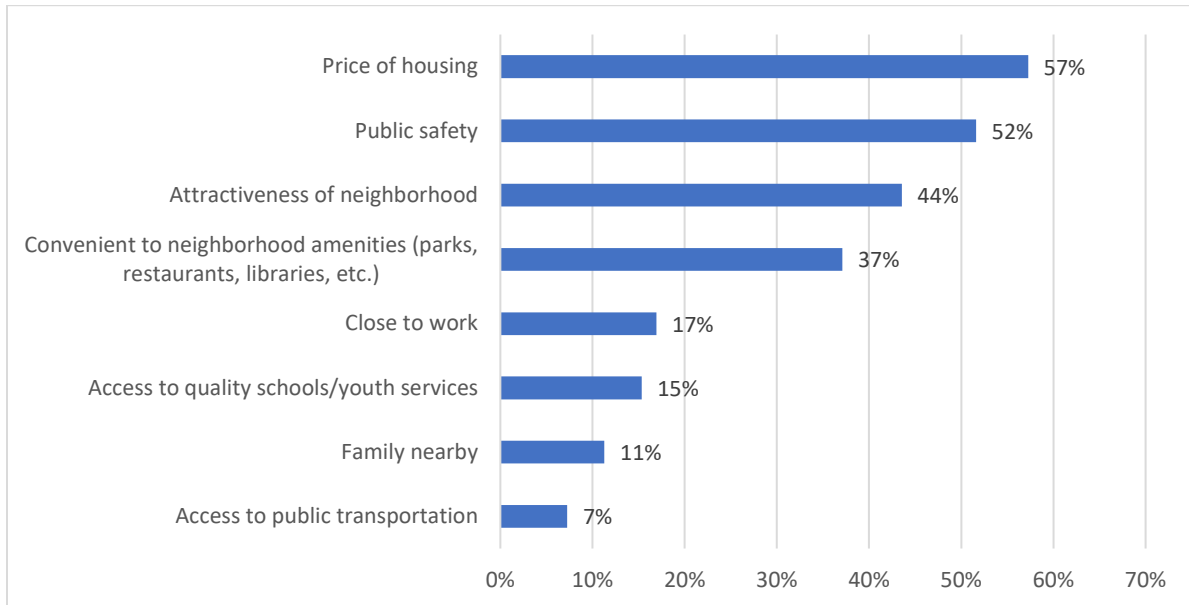
down or for a revolving fund or tax incentives to aid in repairing the homes and turning them back over to the community, especially for affordable housing.

Figure 27: Do you think abandoned or foreclosed properties are a critical issue in the City?



When asked for the most important considerations on place to live, survey respondents most often answered with price of housing or public safety.

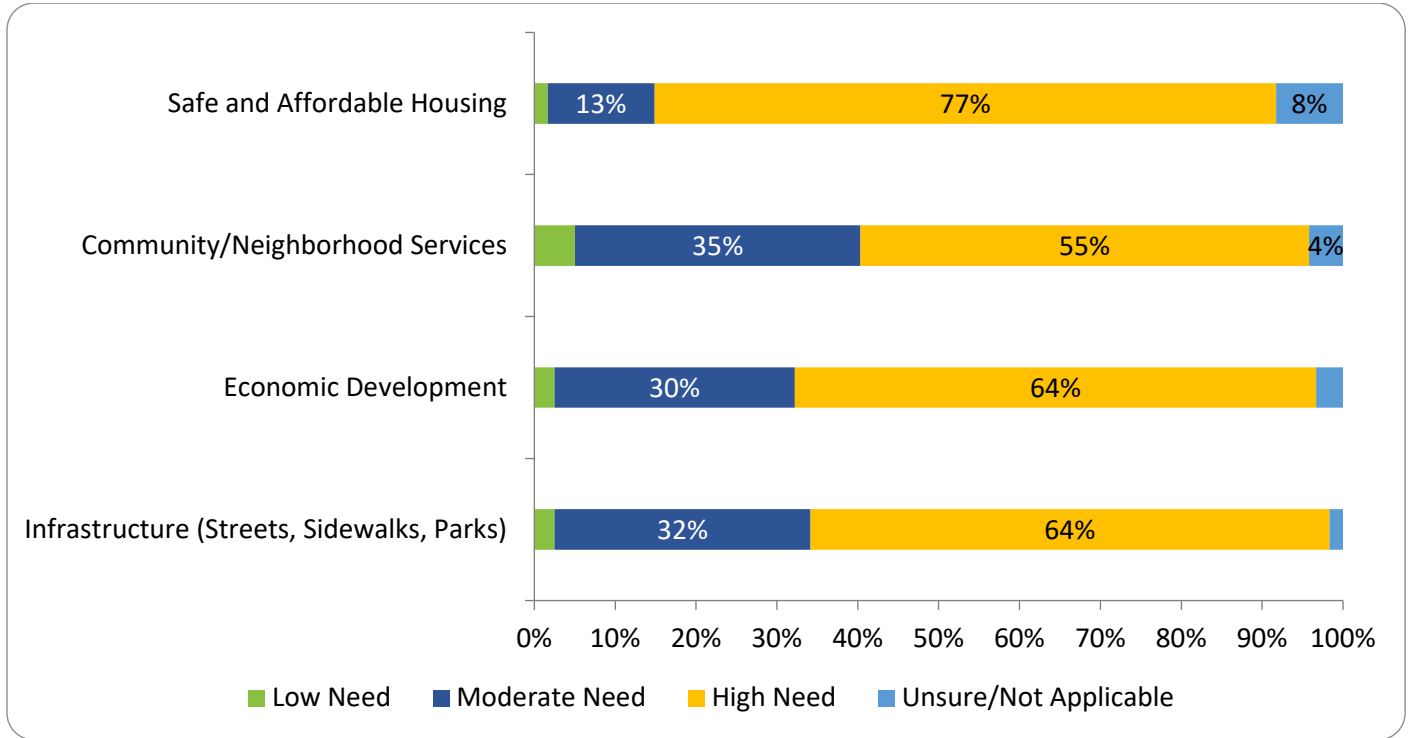
Figure 28: What are the two most important considerations to you in choosing a place to live? (pick two)





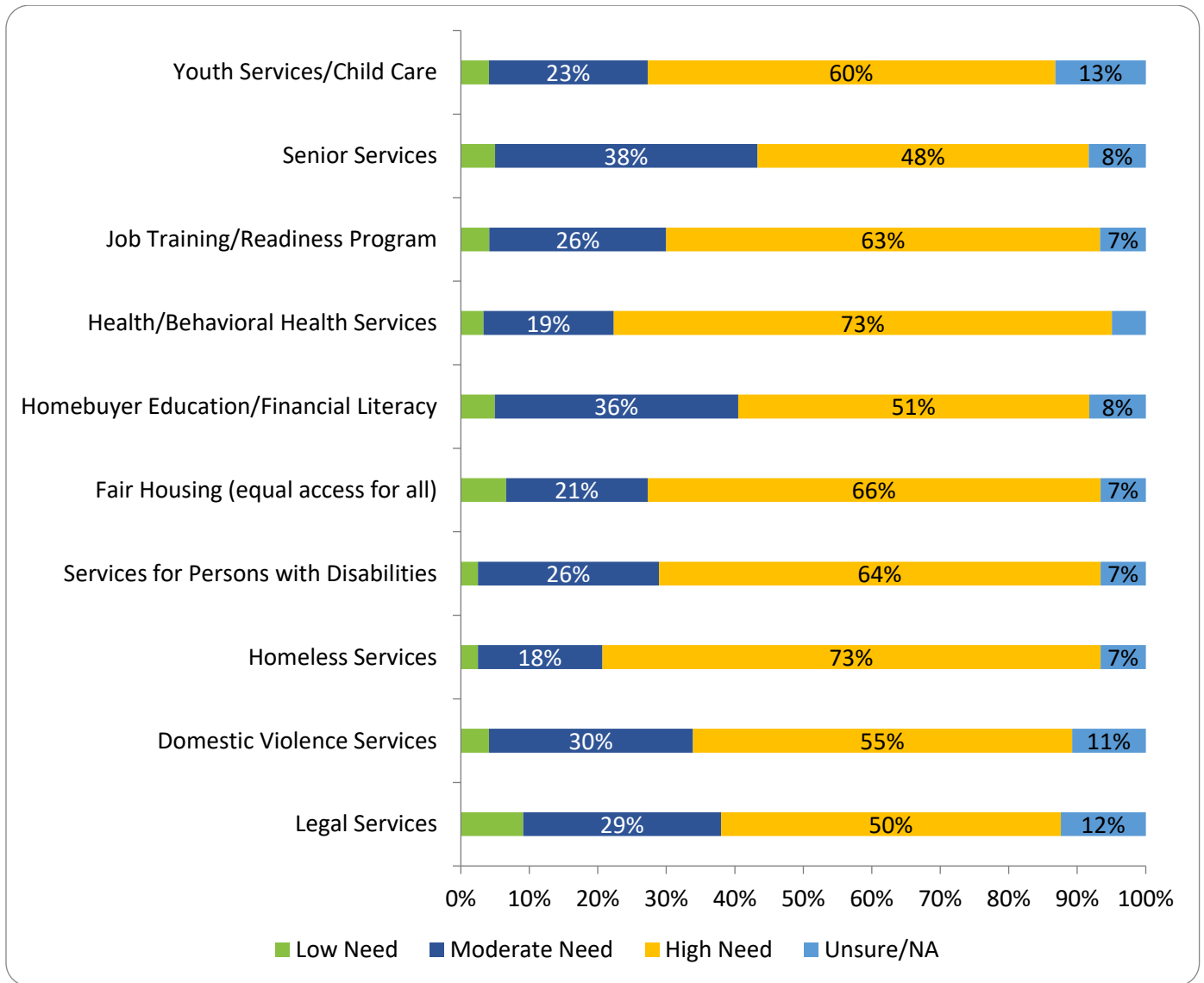
The following question asked survey respondents to rank the level of community need for a variety of amenities or facets of public service. Respondents ranked safe and affordable housing as the highest community development need.

Figure 29: Please rank the level of Community Development needs in Mobile



When asked to rank the level of need for public services, survey respondents ranked health/behavioral health services and homeless services as the highest need, followed by fair housing (equal access for all).

Figure 30: Please rank the level of need for the following types of public services in the city:



When asked if they were happy with their current living situation, 69 percent of respondents said they were happy. Of the respondents who were unhappy, the most common reason were price, safety, and poor housing condition. Respondents could also choose “other” and use the textbox to explain their answer. Other responses included nearby homes being poorly maintained or having trash issues (5), too much crime in their neighborhood - including domestic violence and car theft (5), speeding through the nearby streets making it dangerous to walk (2), poor street lighting, lack of community amenities, and lack of enforcement around smoking in apartments.

Table 47: Are you satisfied with your current living situation? If no, what is the primary reason you are not?

Answer choice	Number responses
I am happy with my current living situation	79
No, other:	15
No, too expensive	5
No, I don't feel safe in the neighborhood	4
No, poor housing condition	4
No, too small	2
No, poor access to good schools.	2
No, poor access to neighborhood amenities	2
No, too crowded	1
No, poor access to public transportation	1
No, too far from work	0

The next question asks the reasons people who want to move from their current home or apartment want to move. For those who wanted to move, the top reason they did not was that they could not afford to move or live anywhere else, or they could not find a better place to live. In open ended responses, respondents stated that rentals were expensive, interest rates were high, and the current situation in senior housing was “institutional looking and depressing, with little or no comfortable, safe outdoor seating”. This respondent elaborated that they would like tiny home communities for seniors with front porches.

Table 48: Would you like to move from your current home or apartment? If yes, what are the three main reasons you have not moved yet. (pick up to three)

Answer Choices	Percent	Number
I do not want to move from my current home/apartment	65%	73
Need the accessibility features of my current housing unit	9%	10
Cannot afford to move/cannot afford to live anywhere else	23%	26
Family reasons	5%	6
Family members do not want to move	2%	2
Cannot find a better place to live	17%	19
Rentals are full; cannot find a place to rent	9%	10
Landlords do not take Section 8	4%	4
Job is here	8%	9

Family is here	8%	9
Other (please specify)		13
	<b>Answered</b>	<b>111</b>
	<b>Skipped</b>	<b>25</b>

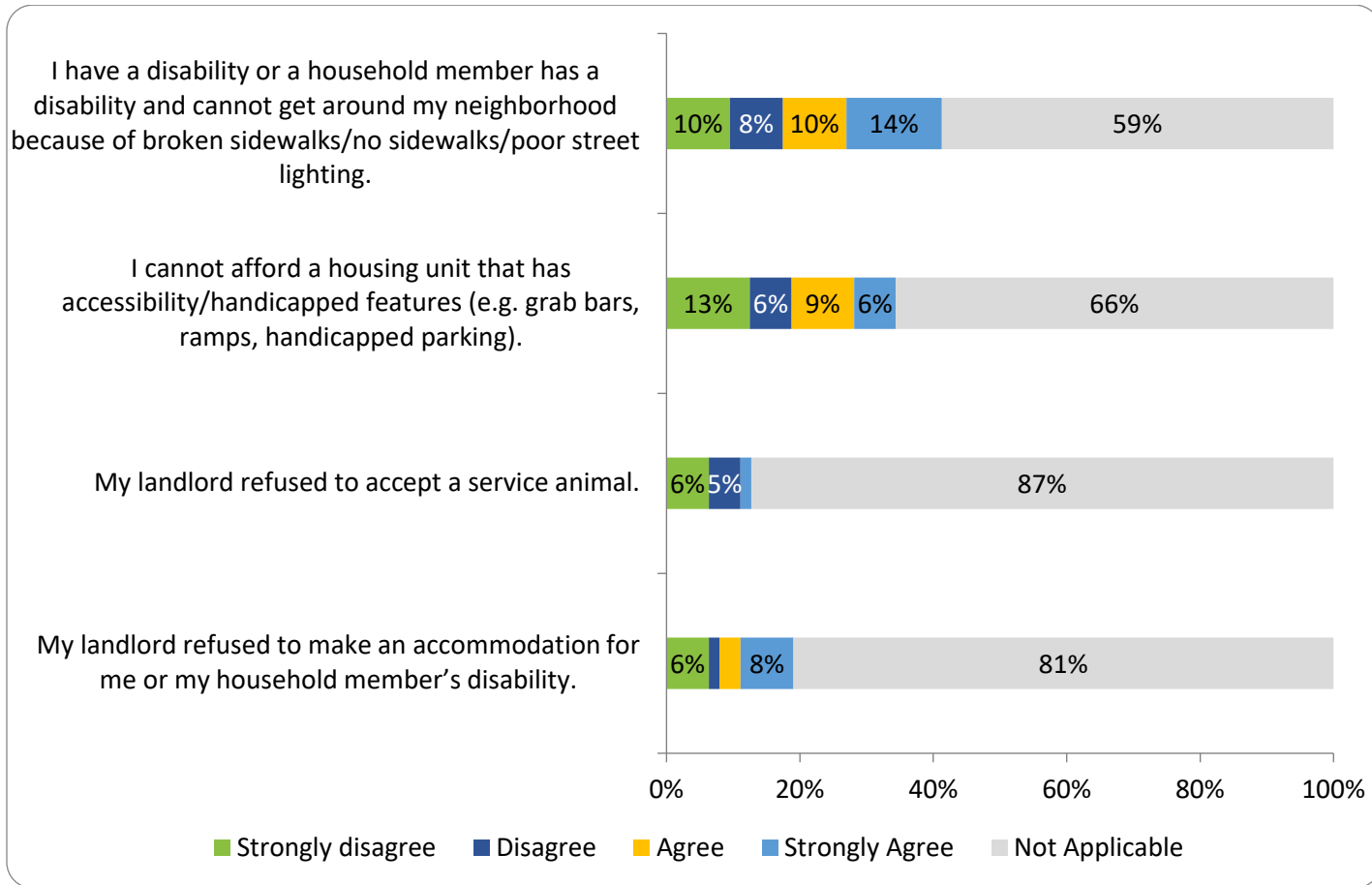
Similarly, when asked what kept people from living in another part of Mobile, most respondents did not want to live in another part of Mobile, and if they did, could not afford to live elsewhere or to move.

*Table 49: What barriers, if any, keep you from living in another part of Mobile (check all that apply)?*

Answer Choices	Percent	Number
I do not want to live in another part of Mobile	57%	61
There are no barriers, if I wanted to move, I could	26%	28
Cannot afford to live anywhere else	22%	24
Cannot afford moving expenses	18%	19
Access to public transit	4%	4
My race/ethnicity	5%	5
My family status	1%	1
Discrimination	6%	6
Felony/criminal record	1%	1
No accessibility/handicapped accessible housing elsewhere	3%	3
Other (please specify)		11
	<b>Answered</b>	<b>105</b>
	<b>Skipped</b>	<b>31</b>

The next questions asked about disability. Of the survey respondents, 71 percent who answered the question “Do you or someone in your household have a disability of any type” said no, while 29 percent of respondents who answered the question said that someone in their household had a disability. They were then asked to rank their agreement or disagreement with statements of discrimination. There was strongest agreement with the sentiment that the physical condition of sidewalks and streets made mobility difficult and the sentiment that it was difficult to afford housing units that had accessibility/handicapped features.

Figure 31: Please rank your level of agreement with the following statements:



The next questions asked about experiences with discrimination. The top reasons survey respondents felt they had been discriminated for housing included income too low, bad credit, other buyer paid cash or a higher price, and source of income. When asked to “specify the neighborhood where you looked for housing, but were denied?”, twelve respondents answered neighborhoods that included Cottage Hill area, West Mobile (2), Midtown (2), Downtown, Fowl River, as well as a few specific apartment complexes. Two people answered that they felt they had been discriminated against because they had kids and did not have current rental history, and another person said they had been condescendingly told about a criminal background and credit check.

Table 50: When you looked for housing to rent or buy in Mobile in the past five years, were you ever denied housing to rent or buy? If yes, why (check all that apply)?

Answer Choices	Percentage	Number
I have not looked for housing to rent or buy in the past five years	51%	56
I was not denied housing to rent or buy	35%	38
Income too low	11%	12

Bad credit	8%	9
Other buyer paid cash or a higher price	6%	6
Source of income	6%	6
Section 8/Housing Choice Voucher	5%	5
Size of my family/household	3%	3
Race/ethnicity	1%	1
Criminal background	1%	1
Health condition/ HIV	0%	0
Sexual orientation or gender identity	0%	0
Immigration status	0%	0
Foreclosure history	0%	0
Service animal	0%	0
Eviction history	0%	0
Other (please specify)		6
	<b>Skipped</b>	<b>29</b>
	<b>Answered</b>	<b>107</b>

Fourteen respondents answered the question what they did about the discrimination with the most common response of nothing. For those that answered “other (please specify)”, most were N/A except for one response that said they had “Mentioned it to the mayor in a social media post when he stated the housing authority was being investigated”. When asked “Did you file a complaint after you were discriminated against (check all that apply)?”, no one answered that they had filed a complaint, and one person wrote that they could not file a complaint because they could not find the landlord’s name. On the question “If you filed a complaint, please describe if the complaint was resolved, how long it took to be resolved, and if you were satisfied with the outcome”, only one person answered that they found housing outside of the City.

Table 51: If you felt you were discriminated against, what did you do about the discrimination (check all that apply)

Answer	Number
Nothing	8
Other (please specify)	6
Called/emailed Center for Fair Housing	1
Called/emailed Housing Authority	1
Called/emailed other organization	0

Called/emailed government agency	0
Called/emailed a lawyer	0

**Open ended questions**

There were two open-ended questions in the survey. The first asked, “If you could change one thing in your neighborhood, what would it be?”. Respondents most often commented with concerns about streets (39 responses), housing (16 responses), trash (15 responses), crime (13 responses), community amenities (12 responses), and other. For street concerns, people were worried about the speeding in their neighborhood, they wanted improved streetlights and street signs, multiple respondents spoke to wanting more walking and biking infrastructure including 22 instances of asking for better sidewalks, and finally calls for traffic monitoring. For housing, respondents wrote about the need for increased property maintenance and housing repair, the large amount of run down/ derelict houses, a need for increased housing affordability, vacancies, and an influx of houses repurposed as AirBnBs. For trash, respondents spoke to littering and “trash everywhere”. For crime, respondents recounted concerns around safety. For amenities, respondents mentioned wanting more parks and recreation, especially with nighttime lighting for safety, more community events, more local restaurants, and more commercial/mixed use within walking distance. Some other concerns included concern around cars parked in inappropriate places, “more creative use of reasonable, in-character multifamily zoning”, a need for greater diversity, worry about noise, and concerns about the cost of living, activities for youth, schools, and homelessness.

The other open-ended question was the survey’s final, and asked, “Is there anything else you want to share related to housing and community needs in Mobile??”. In response, the majority (21) of survey respondents mentioned housing or needed affordable housing. These responses included a need for affordable, attractive housing like townhomes, wanting greater density, missing middle housing, wanting more affordable housing and apartments for young people and blue-collar workers, need for more rent and utility assistance, a need for more Housing Choice Vouchers for low income families, need for more subsidized housing for elderly people, and concerns over the large waitlist for public housing. Some specific concerns were made over housing, including wanting the City to take advantage of the existing housing stock and rehabbing homes, building new housing in Plateau/Africatown, collocating affordable homes with good school districts, and wanting more detached, subsidized housing. One respondent wanted Section 8 tenants to pay higher deposits, while another respondent wanted “Mobile to focus less on the preference and desires of well-off homeowners” and reduce the stigma against renters. Besides housing, four respondents wrote about wanting more sidewalks, biking, and public transit infrastructure. Three respondents wrote about concerns over homelessness and a concern it would increase due to affordability issues. Two respondents wanted a focus on “cleaning up crime”. Other responses included concerns about the energy company monopolies and utility pricing, concerns about noise, and finally concern about government bureaucracy that prevents access to services.

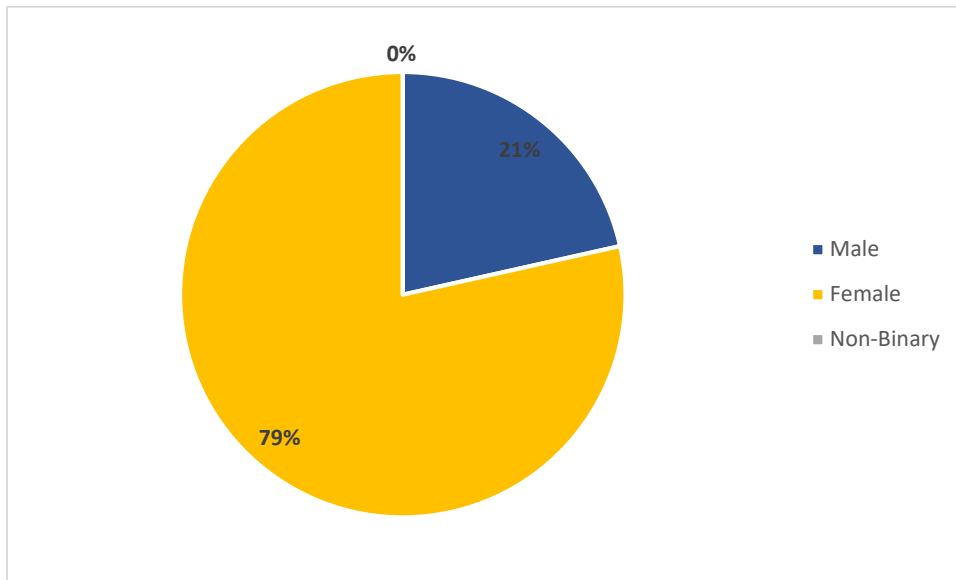


### Survey respondent demographics

The following questions showed the demographics of the respondents who took the survey. These questions were included at the end of the survey to understand representation and were all optional. In comparison to the City, survey respondents were more likely to be white, wealthier, and more likely to be homeowners than the general Mobile population.

The figure below shows that the majority of respondents identified as female (79 percent) while none identified as non-binary.

Figure 32: What is your gender?



For race and ethnicity, 60 percent of the respondents identified as White, 33 percent identified as Black or African American, and 7 percent identified as Other/Multi-race as the top representation. The survey respondents were disproportionately more likely to be White and less likely to be Black or African American than the general Mobile population.

Table 52: Please provide your race (check all that apply):

Answer Choices	Percentage	Number
White	60%	66
Black or African American	33%	36
American Indian and Alaska Native	2%	2
Asian	0%	0
Native Hawaiian and Other Pacific Islander	0%	0
Other/Multi-race	7%	8

7 percent of all respondents identified as Hispanic or Latino.

Table 53: Please provide your ethnicity.

Answer Choices	Percentage	Number
Hispanic or Latino	7%	7
Not Hispanic or Latino	93%	95

The majority of survey respondents lived in either small households of 2-4 people (61 percent) or single person households (23 percent).

Table 54: Please describe your household (check all that apply):

Answer Choices	Percentage	Number
Single person	23%	25
Small household (2-4 people)	61%	68
Large household (more than 4 people)	5%	6
Single parent	9%	10
Household with children under 6 years of age	8%	9
Elderly household with at least one person between the ages of 62 and 74	15%	17
Elderly household with at least one person age 75 or older	7%	8
	<b>Answered</b>	<b>109</b>
	<b>Skipped</b>	<b>27</b>

The majority of survey respondents were employed full time or retired.

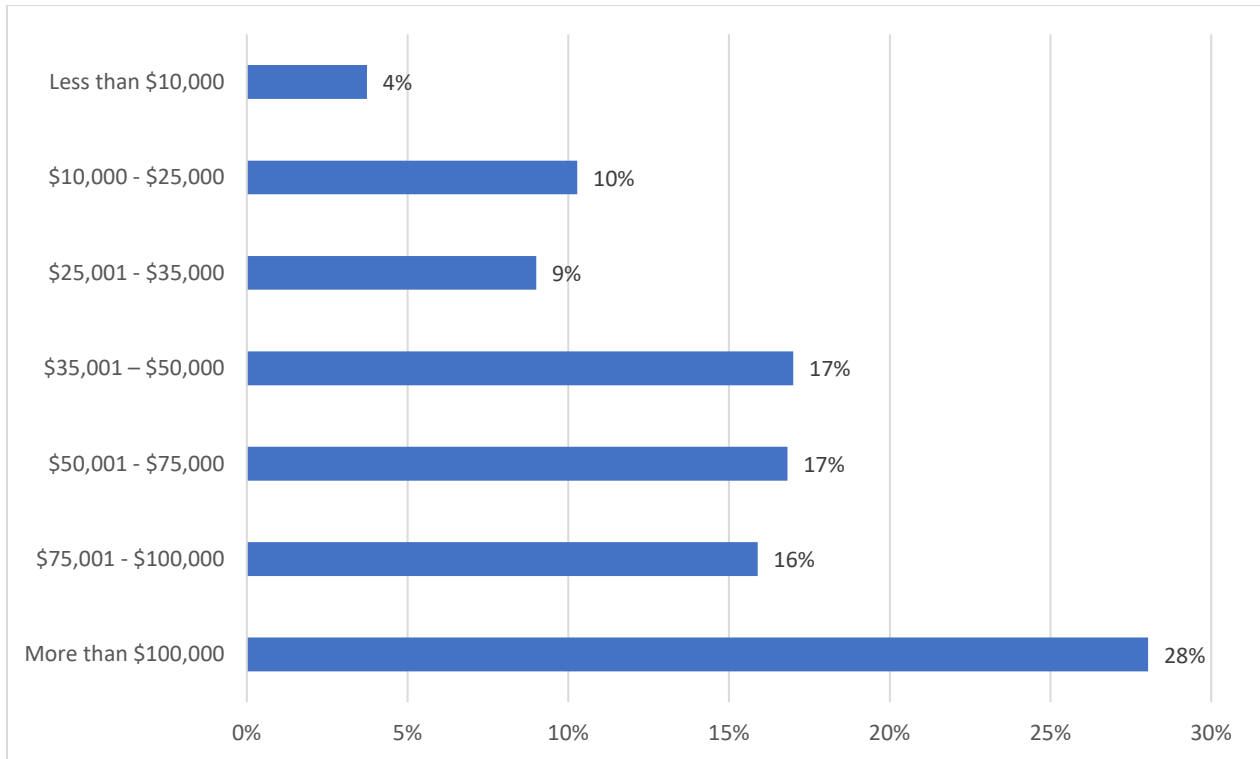
Table 55: Please provide your employment status (check all that apply):

Answer Choices	Percentage	Number
Employed full time	67%	74
Employed part time	10%	11
Student	5%	5
Not employed, looking for work	1%	1
Not employed, NOT looking for work	1%	1
Self-employed	8%	9
Retired	18%	20
Disabled, not able to work	2%	2
Work in home (caregiver, homemaker)	1%	1

	<b>Answered</b>	<b>109</b>
	<b>Skipped</b>	<b>27</b>

Survey respondents skewed higher income than the demographics of Mobile, with only 14 percent of respondent households at less than \$25,000 annually, and 28 percent of respondent households at more than \$100,000.

Figure 33: What category does your total household income fall (include income from all sources)?



Survey respondents were also disproportionately more likely to be homeowners than the general Mobile population.

Table 56: Please provide your housing status (check all that apply):

Answer Choices	Percent	Responses
Own home	71%	77
Rent	28%	31
Have another person/family living in my home	4%	4
Receive a housing subsidy	4%	4

Living doubled up/with friends, family	3%	3
Have difficulty making monthly housing expenses	2%	2
Homeless	1%	1
Have been late on rent or mortgage payments at least twice in past six months	1%	1
	<b>Answered</b>	<b>109</b>
	<b>Skipped</b>	<b>29</b>