

Mississippi Gulf Coast

FAIR HOUSING AND EQUITY ASSESSMENT

Prepared By | Gulf Coast Community Design Studio | December 2013

LIST OF ACRONYMS

ACS	American Community Survey
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AFFH	Affirmatively Further Fair Housing
AI	Analysis of Impediments
AMI	Area Media Income
CDBG	Community Development Block Grant
C-HOST	Coastal Hazard Outreach Strategy Team
CRS	Community Rating System
CTA	Coast Transit Authority
DOJ	U.S. Department of Justice
EIA	Environmental Impact Assessment
ESG	Emergency Shelter Grant
FAIR	Fair Access to Insurance Requirements
FHA	Federal Housing Administration
FHEA	Fair Housing Equity Assessment
FHEO	Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development
FHIP	Fair Housing and Initiatives Program
FHP	Fair Housing Planning
GCCDS	Gulf Coast Community Design Studio
GRPC	Gulf Regional Planning Commission
HCV	Housing Choice Voucher
HMDA	Home Mortgage Disclosure Act
HOME	Home Investment Partnership
HOPWA	Housing Opportunities for Persons with AIDS
HUD	U.S. Department of Housing and Urban Development
IDS	Institute for Disability Studies, University of Southern Mississippi
LITHC	Low Income Housing Tax Credits
MCJ	Mississippi Center for Justice
MDA	Mississippi Development Authority
MSA	Metropolitan Statistical Area
MSPA	Mississippi State Port Authority
NFHA	National Fair Housing Alliance
NFIP	National Flood Insurance Program
NIMBY	“Not in my back yard”
PHA	Public Housing Authority
PRVO	Pearl River Valley Opportunities, Inc.
RAI	Regional Analysis of Impediments
RCAP	Racially Concentrated Area of Poverty
SSI	Supplemental Security Income

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CHAPTER 1

INTRODUCTION

1.1 Plan for Opportunity

The *Plan for Opportunity* is a collaborative planning project intended to guide the sustainable growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The three year planning process is guided by a group of stakeholder committees which have been organized and expanded over the course of the plan to include city and county leadership, key community and public partners, and residents of the region.

The Mississippi Gulf Coast was one of 45 regions nationwide to receive grant funding from the federal Partnership for Sustainable Communities to develop a regional sustainability plan. The Partnership for Sustainable Communities is an agreement between the U.S. Department of Housing and Urban Development, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency to take a more holistic approach to better respond to the regional needs. Guided by six “Livability Principles,” the Partner agencies are coordinating investments, restructuring funding programs, and aligning policies to support local efforts to provide more housing choices, make transportation systems more efficient and reliable, reinforce existing investments, and support vibrant and healthy neighborhoods that attract businesses.

The *Plan for Opportunity* brings the 3 coastal counties and 12 municipalities together in a comprehensive regional planning process that aims to:

- Lower transportation and housing costs by creating better connections between where people live and work.
- Develop in ways that value the natural environment, understanding that regional prosperity is dependent on our many environmental assets.
- Improve air quality by making buildings more energy efficient and reducing vehicle miles traveled.
- Create a broad range of employment and business opportunities by coordinating land-use, transportation and infrastructure planning.
- Improve regional health by ensuring that all communities have access to fresh food, safe recreation, open space, medical care, and clean air and water.

The planning process is a broad-based effort, understanding that the success of the final plan rests on the extent of stakeholder input and decision-making. The *Plan for Opportunity* is key to strengthening the economy, improving quality of life for residents, and creating a more sustainable future for the region.

1.2 Fair Housing and Equity Assessment

Developing a Fair Housing and Equity Assessment (FHEA) for the Mississippi Gulf Coast Region is a requirement under the Sustainable Communities Regional Planning Grant initiative. On February 23, 2012, HUD Secretary Shaun Donovan said:

Sustainability also means creating “geographies of opportunity,” places that effectively connect people to jobs, quality public schools, and other amenities. Today, too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one’s zip code predicts poor education, employment, and even health outcomes. These neighborhoods are not sustainable in their present state.

The purpose of the FHEA is to identify and address these inequalities in opportunity. The FHEA focuses on the following five indicators identified and defined by HUD in order to gain a full picture of regional equity and access to opportunity:

1. Segregation and Integration;
2. Racially Concentrated Areas of Poverty;
3. Access to Existing Areas of High Opportunities;
4. Fair Housing Issues, Services, and Activities; and
5. Major Public Investments.

Community input has been gathered throughout the process and incorporated into the FHEA. The end result of this regional scale analysis is to understand the historical, current, and future context for equity and opportunity in the region and to integrate the findings into the planning process and the recommendations into the final *Plan for Opportunity*.

1.3 Relationship between FHEA and Plan for Opportunity

The FHEA was undertaken in conjunction with the development of the *Plan for Opportunity*. The *Plan for Opportunity* is a collaborative planning project intended to guide the sustainable growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The three year planning process was guided by a group of stakeholder committees which have been organized and expanded over the course of the plan to include city and county leadership, key community and public partners, and residents of the region.

The Housing Subcommittee was charged with analyzing the current housing landscape on the Mississippi Gulf Coast; identifying housing and housing related issues; and developing recommendations to be incorporated into the final plan. The Housing Subcommittee of the *Plan for Opportunity* oversaw the development of the FHEA under the guidance of the Gulf Coast Community Design Studio and other Plan partners (See Appendix A).

Work on the FHEA began in April 2012 following HUD's webinar series on the FHEA/RAI component of the grant. The initial analysis was completed and approved for public review by the governing committees of the *Plan for Opportunity* in April 2013. The Housing Subcommittee and other topical subcommittees immediately began using the findings of the FHEA to guide and even redirect their work where appropriate. The Economic Development and Workforce Subcommittee and the Transportation Subcommittee, for example, both surveyed RCAPs identified as having low socioeconomic and mobility opportunity to better understand barriers to employment and access to transportation in those particularly vulnerable areas. As such, the findings of the FHEA were substantially integrated into the *Plan for Opportunity* and had a major influence on the recommendations coming out of the *Plan for Opportunity*. Section 8, Bridging the Gap, details the process for integrating the findings of the FHEA into the development of recommendations in the *Plan for Opportunity*.

1.4 Relationship between FHEA and Jurisdictional Analysis of Impediments for Fair Housing

Currently there are four entitlement jurisdictions in the Mississippi Gulf Coast Region that are recipients of CDBG and HOME funds from HUD and are required to prepare an Analysis of Impediments (AI). The FHEA follows much of the format required by HUD's Fair Housing Planning Guide for a jurisdictional AI. Like an AI, the FHEA examines regional demographics and conditions of racial and ethnic segregation. It considers public sector activities affecting housing choice, such as zoning and land use regulation, and distribution of affordable housing resources. It also considers private sector policies and procedures such as lending practices and trends in home sales and rentals. Both the FHEA and AI account for recent or current allegations of systemic discrimination against private or public entities in the 15 jurisdictions in the Sustainable Communities grant area, and the capacity of the entities in the area to respond.

There are, however, several areas in which the requirements of the FHEA and Regional AI differ. The historic focus of the AI has been on the local level. Jurisdictions receiving and allocating federal funding have the responsibility to identify and address impediments to fair housing within their borders. Because the obligation to conduct an AI in conjunction with CDBG and HOME funds is statutory, jurisdictions that fail to carry out the steps required by the AI certification are at risk of enforcement action. The FHEA, however, is regional in scope, is not directly tied to funding, and does not have a comparable enforcement framework in the Sustainable Communities program.

HUD strongly encouraged the Sustainable Communities grantees to produce a Regional AI instead of the required Regional FHEA. Individual entitlement jurisdictions within the Sustainable Communities regions could then “opt-in” to these regional AIs instead of producing their own individual analyses. HUD provided valuable analytical tools and technical assistance to its grantees to facilitate the conversion to a Regional AI, but has yet to issue final guidance on what exactly the Regional AI would entail. While the fair housing officers of the entitlement jurisdictions on the coast expressed interest in the prospect of doing a Regional AI in the future, they had numerous questions and concerns regarding the benefits and funding implications for their jurisdictions. As such, the Project Management Committee and advisory groups for the *Plan for Opportunity* decided to conduct a Fair Housing and Equity Assessment, but recommend continuing discussions with local entitlement jurisdictions about the possibility of doing a RAI in the future and encourage more direct communication between HUD and the entitlement jurisdictions regarding the benefits and funding implications of participation in a RAI.

CHAPTER 2

BACKGROUND

2.1 Regional History

The Mississippi Gulf Coast region refers, most commonly, to the three southernmost counties that lie on the Gulf of Mexico: Hancock, Harrison and Jackson Counties. The phrase is also used to describe the network of towns and cities of the three coastal counties that are linked together via U.S. Highway 90. The towns include, from west to east, Waveland, Bay St. Louis, Diamondhead, Pass Christian, Long Beach, Gulfport, Biloxi, D'Iberville, Ocean Springs, Gautier, Pascagoula and Moss Point.

The region is a mix of cultural influences derived from early French and Spanish explorers and Native Americans. The economy has traditionally been dominated by the local and international seafood industries in conjunction with a strong tourist and entertainment industry driven by the casinos and access to the beaches. The defense and ship-building industries, Stennis Space Center and a strong academic and research network have also become increasingly important to the regional economy.

In recent years, the Gulf Coast has suffered from a series of devastating natural and economic disasters. The region was severely damaged by Hurricane Camille in 1969 and again by Hurricane Katrina in 2005. The aftermath of Hurricane Katrina has had far reaching and lasting consequences for the coastal communities. The storm brought a 30-foot surge that washed over the coast, and rain combined with heavy winds that caused severe additional damage. Nearly 20% of the coast's buildings and a significant portion of infrastructure were destroyed.

Flood maps had to be re-drawn, placing many properties not previously designated in the floodplain to be considered at risk. As a result, insurance rates were increased, and new building codes were implemented that require houses in the floodplain to be elevated. Many hardworking Mississippi Gulf Coast residents have been unable or unwilling to rebuild their homes, resulting in large swaths of vacant land. Further complicating rebuilding efforts, the BP Oil Spill in 2010 hurt the local economy by temporarily shutting down the local seafood industries and significantly harming the tourism industry. The national recession further complicated these regional challenges. The Mississippi Gulf Coast Region is still in the process of the long term recovery from disasters such as Katrina and the BP Oil spill. Many of the larger non-military industries have still not reached full capacity.

Mississippi, like most southern states, has been marked by a deep history of segregation and discrimination. These patterns of both overt and unintentional discrimination are complex and often difficult to identify and address. Communities in the Mississippi Gulf Coast Region have made tremendous strides in the past several decades to address policies and programs that have contributed to segregation and continue to proactively monitor and encourage residential integration. There still is, however, evidence of residential racial segregation stemming from a nearly century-long legacy of laws that mandated or reinforced the physical separation of the races and continues to affect the population today. Some of the more significant contributors to segregations are covered in Section 3.5. While this FHEA does not explore all aspects and effects of the history of segregation in the region, a more in-depth study would be highly beneficial for the area.

Despite the extreme challenges that have tried and tested the region over the past decade, the story of the Mississippi Gulf Coast is one of hope and resiliency. The people of the coast continue to endure and build back stronger communities. Within the past couple of years the jurisdictions have started to work closer together as they increasingly see the value in collectively addressing challenges that cross their boundaries. The *Plan for Opportunity* and its commitment to equity, resiliency and regional planning is a promising start to the next chapter in this region's story.

2.2 Demographic Overview

As shown in Tables 2.1 through 2.3, between 2000 and 2010 the region has become more diverse, with each of the three counties experiencing growth in the Hispanic/Latino, Black/African American and Asian Communities while the White majority population has decreased an average of 2.8%. The Hispanic/Latino Community experienced the largest population growth averaging a 2.2% increase with the largest population gain happening in Harrison County. These trends are consistent with trends at the national level and are expected to continue.

Table 2.1: Population Change by Race and Age in Hancock County

Population by Race	2000		2010		% Change
White	38,752	90.2%	38,842	88.4%	-1.8%
Black or African American	2,934	6.8%	3,138	7.1%	0.3%
Hispanic/Latino(a)	775	1.8%	1,446	3.3%	1.5%
Asian	377	0.9%	419	1.0%	0.1%
American Indian or Alaskan Native	257	0.6%	213	0.5%	-0.1%
Native Hawaiian or Pacific Islander	16	0.0%	21	0.0%	0.0%
Total Population	42,967		43,929		

Households by Age of Individuals					
Households with individuals under 18 years	5,992	35.5%	5,642	32.5%	-3.0%
Households with individuals 65 years and over	4,361	25.8%	4,847	27.9%	2.1%
Total Households	16,897		17,380		

Source: 2010 Census

Table 2.2: Population Change by Race and Age in Harrison County

Population by Race	2000		2010		% Change
White	138,692	73.1%	130,366	69.7%	-3.5%
Black or African American	39,984	21.1%	41,393	22.1%	1.0%
Hispanic/Latino(a)	4,910	2.6%	9,937	5.3%	2.7%
Asian	4,934	2.6%	5,322	2.8%	0.2%
American Indian or Alaskan Native	861	0.5%	863	0.5%	0.0%
Native Hawaiian or Pacific Islander	163	0.1%	263	0.1%	0.1%
Total Population	189,601		187,105		

Households by Age of Individuals					
Households with individuals under 18 years	26,979	37.7%	24,993	35.0%	-2.7%
Households with individuals 65 years and over	15,295	21.4%	16,379	22.9%	1.5%
Total Households	71,538		71,476		

Source: 2010 Census

Table 2.3: Population Change by Race and Age in Jackson County

Population by Race	2000		2010		% Change
White	99,026	75.4%	100,735	72.1%	-3.2%
Black or African American	27,432	20.9%	30,034	21.5%	0.6%
Hispanic/Latino(a)	2,807	2.1%	6,378	4.6%	2.4%
Asian	2,059	1.6%	3,023	2.2%	0.6%
American Indian or Alaskan Native	440	0.3%	565	0.4%	0.1%
Native Hawaiian or Pacific Islander	52	0.0%	79	0.1%	0.0%
Total Population	131,420		139,668		

Households by Age of Individuals					
Households with individuals under 18 years	19,861	41.7%	19,305	37.0%	-4.7%
Households with individuals 65 years and over	9,895	20.8%	12,728	24.4%	3.6%
Total Households	47,676		52,205		

Source: 2010 Census

The region has also experienced a demographic shift in the overall age of the population. Over the last 10 years, the region has aged with fewer households with children and more households with persons age 65 and over. Jackson County has seen the largest shift in the age of the population with households with children decreasing by 4.7% and elderly households increasing by 3.6%.

The 2011 American Community Survey (ACS) 3-Year Unemployment Estimates for the Mississippi Gulf Coast show that the region overall has an unemployment rate above the national average of 10.3%. Hancock County has the highest unemployment rate of 13.4%, followed by Jackson County at 11.6% and Harrison County at 9.5% (See Figure 2.4). These estimated numbers are slightly higher than those provided by the Mississippi Department of Employment Security (See Figure 2.5).

The median household incomes for three counties are below the national average of \$51,484, with Jackson County having the highest average income at \$48,603, followed by Harrison County at \$42,523 and Hancock County at \$42,264 (See Figure 2.6).

Table 2.4: Unemployment Rate by County

Unemployment	Hancock	Harrison	Jackson	Average	U.S.
2007 ACS 3-Year Estimates	8.4%	9.5%	9.4%	9.1%	6.6%
2009 ACS 3-Year Estimates	7.8%	7.9%	8.0%	7.9%	7.5%
2011 ACS 3-Year Estimates	13.4%	9.5%	11.6%	11.5%	10.3%

Source: 2009 American Community Survey 3-Year Estimates. 2011 American Community Survey 3-Year Estimates

Table 2.5: Annual Unemployment Rate by County

Unemployment	Hancock	Harrison	Jackson	M.S.	U.S.
2007	5.4%	5.5%	5.6%	6.3%	4.6%
2008	5.7%	5.6%	5.9%	6.8%	5.8%
2009	7.9%	7.6%	8.2%	9.4%	9.3%
2010	9.2%	9.2%	9.7%	10.5%	9.8%
2011	10.1%	9.7%	11.2%	10.7%	8.9%

Source: Mississippi Department of Employment Security, Bureau of Labor Statistics

Table 2.6: Median Household Income by County

Median Household Income	Hancock	Harrison	Jackson	Average	U.S.
2009 ACS 3-Year Estimates	\$42,586	\$52,091	\$47,862	\$47,513	\$51,369
2011 ACS 3-Year Estimates	\$42,264	\$42,523	\$48,603	\$44,463	\$51,484

Source: 2009 American Community Survey 3-Year Estimates. 2011 American Community Survey 3-Year Estimates

The numbers for both household income and unemployment rate reflect the day-to-day economic challenges faced by many residents on the Mississippi Gulf Coast in varying degrees. Trends and disparities by race/ethnicity, age, income and other segments of the population will be further explored in this FHEA in order to provide a basis for envisioning a more equitable and prosperous future for the Mississippi Gulf Coast.

CHAPTER 3

SEGREGATION AND INTEGRATION

In order to identify and assess racial/ethnic segregation and integration in Mississippi's Gulf Coast region, it is helpful to review and understand various indicators that look at the spatial distribution of minority and majority populations. This assessment will look at an indicator called the Dissimilarity Index, the Isolation/Exposure Index, dot density maps showing residential clustering across the region, and another indicator called the Predicted Racial/Ethnic Composition Ratio.

3.1 Dissimilarity Index

The most widely used measure of segregation or integration is the dissimilarity index. A dissimilarity index, in general, measures the extent to which the distribution of two groups differs across census tracts or block groups. In this case, the dissimilarity index scores are used as an indicator of segregation and compare the distribution of two different racial groups; the white population and a minority population. The index ranges from 0.0 (complete integration) to 100.0 (complete segregation). HUD has determined thresholds for high, medium and low segregation based on an extensive review of existing literature and statistical distributions. According to HUD, dissimilarity index scores of 40.0 or less indicate low segregation; scores between 41.0 and 54.0 indicate moderate segregation; and scores of 55.0 or greater indicate high segregation.

Table 3.1 shows the 2010 Dissimilarity Index scores for the Gulfport-Biloxi MSA, the Pascagoula MSA and the jurisdictions in the 3 coastal counties. Due to lack of available data there are no scores for Bay St. Louis, D'Iberville, Pass Christian, Waveland or unincorporated areas. Most of the scores indicate low segregation across the region. Of the jurisdictions on the coast the White-Black dissimilarity index score for Moss Point is the highest with a score of 56.7 and indicates that there is high segregation in this jurisdiction.

As a first step to understanding the high level of segregation in Moss Point, the Gulf Coast Community Design Studio and Steps Coalition held a focus group of residents and community leaders in Moss Point on October 22, 2013. Seven residents of Moss Point attended the focus group representing such organizations as Jackson County Civic Action Agency, Nettles Foundation, and The Trinity Outreach Corporation, Inc. Residents went over the findings of the FHEA, specifically in regards to the high levels of segregation in Moss Point, and were asked to share their reactions to the information and to discuss some of the causes and possible solutions to these trends.

The participants in the focus group were not surprised by the statistical evidence of high levels of segregations in Moss Point. They discussed white flight in the early 1980's due to fear and unrest; poverty; crime and the perception of high levels of crime; and poorly performing schools. Residents agreed that some of this "flight" from the city was due to race, but that much of it was also based on peoples' financial capacity to leave. Some of these concerns still exist today and residents worry that there is a lingering stigma about the area; though all agreed the overall perception of Moss Point is improving. Participants felt that the residents of Moss Point need to be ambassadors for the area and promote the positive things about Moss Point in order for perceptions to change. They agreed that support from local leadership, recruitment of more businesses downtown, investment in education, enforcement of property maintenance codes, and investment in beautification efforts would greatly improve Moss Point and help counter the lingering effects of urban flight.

Residents also discussed the need for more equity in the distribution of public resources and public services and that there is a perceived disparity in the level of investment in different areas of the city. All agreed that race issues still exist within the city and that the local leadership and residents need to more openly recognize these issues in order to address them. Several of the residents had participated in a workshop held by the William Winter Institute for Racial Reconciliation and found it to be a very positive experience from which other residents and leadership could greatly benefit. As residents and leadership continue to work to overcome this history of segregation it will be important to monitor ongoing trends in segregation in the area.

Tables 3.2 through 3.4 look at the trends in dissimilarity index scores from 2000 through 2010 for each major minority group. When looking at the trends in dissimilarity index scores for the major minority groups several of the jurisdictions on the coast have shown an increase in segregation. Between 2000 and 2010, Moss Point has seen an increase in White-Black segregation, Biloxi has seen an increase in White-Hispanic segregation, and Ocean Springs has seen an increase in White-Asian segregation. It is important to note that the dissimilarity index becomes less reliable when looking at populations that are small and so it is important to consider other indicators, as well.

Table 3.1: 2010 Dissimilarity Index

Geography	White-Black	White-Hispanic	White-Asian
Gulfport-Biloxi MSA	40.6	30.6	34.8
Pascagoula MSA	51.3	32.5	41.6
Biloxi	28.6	23	24.6
Gautier	16.5	9.7	10.4
Gulfport	39.5	20.5	16.7
Long Beach	12.4	5.6	8.5
Moss Point	56.7	42.4	27.6
Ocean Springs	7.5	11	28.7
Pascagoula	29.5	36.2	27.8

Source: University of Michigan, Population Studies Center and

Table 3.2: Changes in White-Black Dissimilarity Index, 2000-2010

Geography	2000	2005-2009	2010
United States	39	39.8	
Mississippi	49	48	
Gulfport-Biloxi MSA	45.1	41.5	40.6
Pascagoula MSA	55.8	52.2	51.3
Biloxi	35	35	28.6
Gautier	17.9	26.9	16.5
Gulfport	48.9	54.6	39.5
Long Beach	17.6	19.6	12.4
Moss Point	55	53.1	56.7
Ocean Springs	8.1	15.6	7.5
Pascagoula	43.3	50.1	29.5

**Source: University of Michigan, Population Studies Center and Brown University*

Table 3.3: Changes in White-Hispanic Dissimilarity Index, 2000-2010

Geography	2000	2005-2009	2010
United States	40.7	39.5	
Mississippi	32	48	
Gulfport-Biloxi MSA	24.2	33	30.6
Pascagoula MSA	30.5	37	32.5
Biloxi	22.4	22.4	23
Gautier	32.7	41.5	9.7
Gulfport	19.4	30	20.5
Long Beach	12	20.4	5.6
Moss Point	41.3	50.5	42.4
Ocean Springs	14.9	22.5	11
Pascagoula	42.5	61.6	36.2

**Source: University of Michigan, Population Studies Center and Brown University*

Table 3.4: Changes in White-Asian Dissimilarity Index, 2000-2010

Geography	2000	2005-2009	2010
United States	53.5	52.1	
Mississippi	48	59	
Gulfport-Biloxi MSA	38.8	46.4	34.8
Pascagoula MSA	42.1	60.6	41.6
Biloxi	38	38	24.6
Gautier	6.9	70.1	10.4
Gulfport	17.6	38.7	16.7
Long Beach	6	22.3	8.5
Moss Point	19.3	44.1	27.6
Ocean Springs	25.4	24.8	28.7
Pascagoula	34.6	67.2	27.8

**Source: University of Michigan, Population Studies Center and Brown University*

**State data comes from the Population Studies Center. (n.d.) New Racial Segregation Measures for States and Large Metropolitan Areas. University of Michigan. Population Studies Center. Institute for Social Research. <http://www.psc.isr.umich.edu/dis/census/segregation.html>*

MSA and city data comes from Brown University. (n.d.) Residential Segregation. US2010. Spatial Structures in Social Sciences. <http://www.s4.brown.edu/us2010/segregation2010/Default.aspx?msa=37700>

The isolation and exposure index is another measure of segregation. It is very similar conceptually to the dissimilarity index and highly correlated, but tends to be more reliable when minority populations are small. Scores range from 0 to 100. The isolation measure looks at how isolated a group is; for example if whites tend to live in almost all white census tracts the score will be high. The exposure measure looks at how different racial groups are exposed to one another. In this case a lower score indicates a higher degree of segregation. This assessment will look at the isolation measure for various racial groups.

Table 3.5 shows the isolation index scores for the Gulfport-Biloxi MSA, the Pascagoula MSA and the jurisdictions in the 3 coastal counties. As with the dissimilarity index, due to lack of available data there are no scores for Bay St. Louis, D'Iberville, Pass Christian or Waveland. The isolation scores for the White population are high throughout the region, but are the highest in Long Beach and Ocean Springs with scores of 83.6 and 83.2 respectively. The scores for the minority populations are relatively low across the region except for the Black population in Moss Point with a score of 81.2. The next highest score is for the Black population in Gulfport with a score of 51.7.

Table 3.5: 2010 Isolation Index

Geography	White	Black	Hispanic	Asian
Gulfport-Biloxi, MSA	76.3	35.5	6.5	5.2
Pascagoula, MSA	79.4	43.3	7.4	5.3
Biloxi	68.4	26.8	10.0	7.7
Gautier	59.7	35.5	5.5	2.0
Gulfport	63.6	51.7	6.2	2.8
Long Beach	83.6	9.2	3.7	3.2
Moss Point	44.8	81.2	2.5	0.8
Ocean Springs	83.2	8.1	4.4	5.0
Pascagoula	60.2	38.3	13.6	1.4

***Source: Brown University*

Tables 3.6 through 3.9 look at the trends in isolation index scores from 2000 through 2010 for the White population and each of the major minority group. The scores for the White population have decreased between 2000 and 2010 for both MSA's and all the jurisdictions. The scores for the Black population in both MSA's decreased between 2000 and 2010 indicating a decrease in segregation. The scores in several of the jurisdictions, however, have increased indicating an increase in segregation in those jurisdictions. The most notable increase was in Gautier followed by Moss Point, Long Beach and Ocean Springs. This is interesting given that the dissimilarity index only indicated an increase in segregation of the Black population in Moss Point.

Table 3.6: Changes in White Isolation Index, 2000–2010

Geography	2000	2005-2009	2010
Gulfport-Biloxi, MSA	79.9	77.2	76.3
Pascagoula, MSA	82.7	80.1	79.4
Biloxi	73.9	71.8	68.4
Gautier	67.1	67.4	59.7
Gulfport	71.4	70.2	63.6
Long Beach	86.1	84.8	83.6
Moss Point	51.7	45.3	44.8
Ocean Springs	86.2	80.6	83.2
Pascagoula	73.0	70.2	60.2

****Source:** Brown University

Table 3.7: Changes in Black Isolation Index, 2000–2010

Geography	2000	2005-2009	2010
Gulfport-Biloxi, MSA	36.5	37.1	35.5
Pascagoula, MSA	46.0	45.0	43.3
Biloxi	30.3	24.4	26.8
Gautier	30.3	34.9	35.5
Gulfport	54.5	59.6	51.7
Long Beach	8.6	14.0	9.2
Moss Point	80.2	82.5	81.2
Ocean Springs	7.6	12.6	8.1
Pascagoula	44.6	43.6	38.3

****Source:** Brown University

Table 3.8: Changes in Hispanic Isolation Index, 2000–2010

Geography	2000	2005-2009	2010
Gulfport-Biloxi, MSA	3.2	5.8	6.5
Pascagoula, MSA	3.2	7.8	7.4
Biloxi	4.8	11.7	10.0
Gautier	10.7	8.6	5.5
Gulfport	3.2	6.6	6.2
Long Beach	2.5	2.5	3.7
Moss Point	1.2	9.2	2.5
Ocean Springs	2.8	3.8	4.4
Pascagoula	7.1	15.5	13.6

****Source:** Brown University

Table 3.9: Changes in Asian Isolation Index, 2000–2010

Geography	2000	2005-2009	2010
Gulfport-Biloxi, MSA	8.0	8.7	5.2
Pascagoula, MSA	4.0	8.1	5.3
Biloxi	13.4	14.3	7.7
Gautier	1.7	0.8	2.0
Gulfport	2.2	2.9	2.8
Long Beach	3.0	6.1	3.2
Moss Point	0.6	1.2	0.8
Ocean Springs	4.0	5.6	5.0
Pascagoula	1.7	4.1	1.4

****Source:** Brown University

****Isolation Index scores come from Brown University. (n.d.) Residential Segregation. US2010. Spatial Structures in Social Sciences. <http://www.s4.brown.edu/us2010/segregation2010/Default.aspx?msa=37700>**

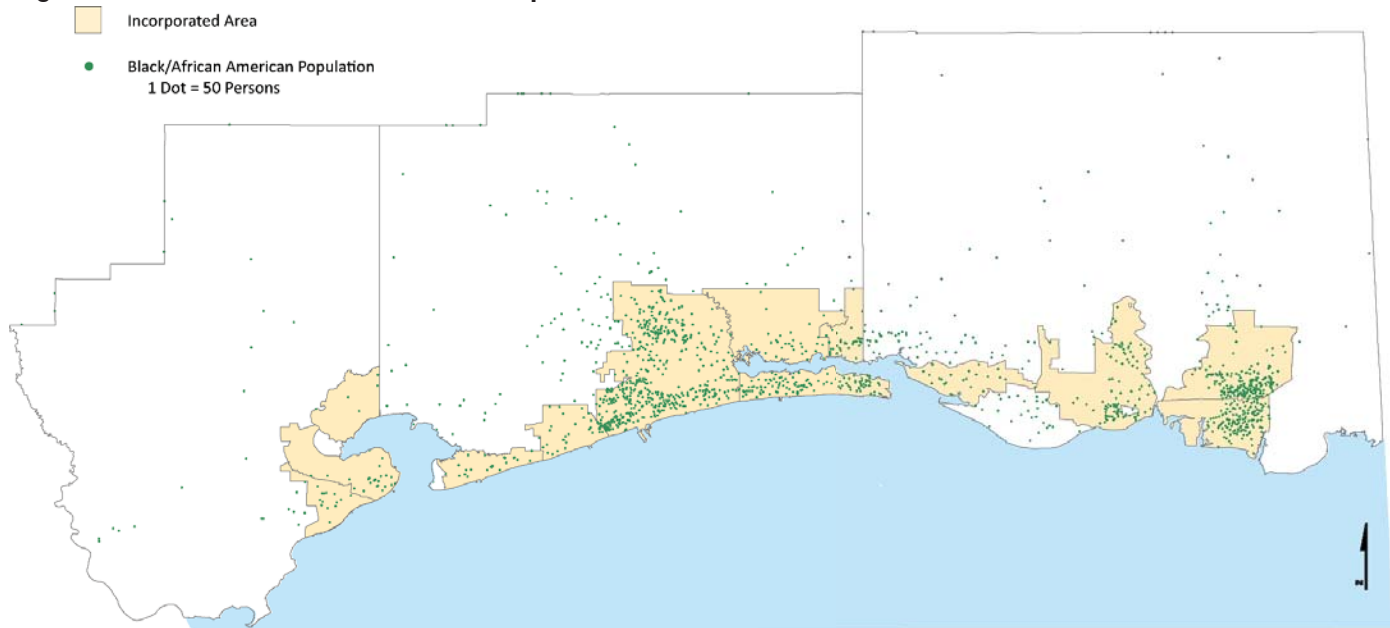
Many more of the jurisdictions have seen an increase in segregation of the Hispanic and Asian populations. Between 2000 and 2010 both MSA's and all jurisdictions except Gautier saw an increase in segregation in the Hispanic population. The Pascagoula MSA and all jurisdictions except Biloxi and Pascagoula saw an increase in the Asian population. Again, this is interesting considering the dissimilarity index only indicated increases in segregation in Biloxi for the Hispanic population and in Ocean Springs for the Asian population. While there appears to be increases in the segregation of the Hispanic and Asian populations across the region, it is important to note that the scores are all very low indicating that the region is actually not very segregated in terms of these populations.

3.3 Residential Clusters

Dot density maps are a way to show spatial patterns of a certain phenomena. This assessment looks at where the various minority populations in the region live in order to determine if there are concentrations of certain populations.

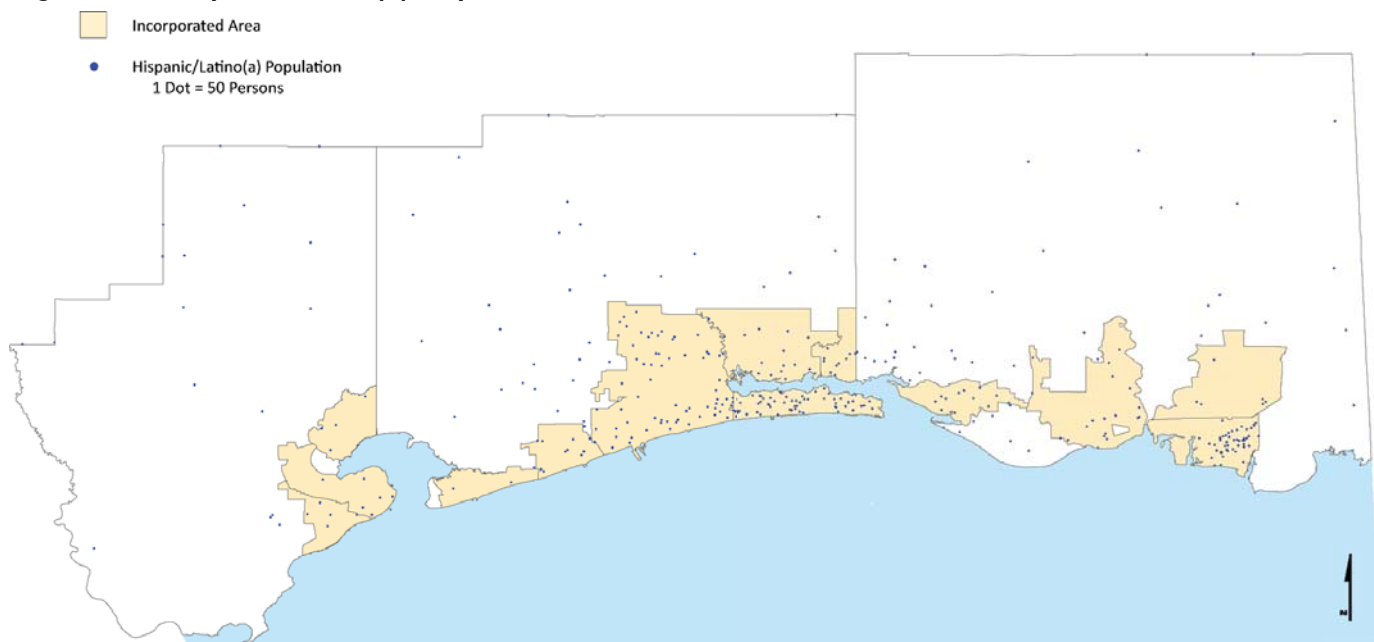
Figures 3.1 and 3.2 show the Black/African American and Hispanic/Latino(a) populations across the coast. There appears to be some concentration of minority populations, especially Black/African American populations in areas of Gulfport, Biloxi, Gautier, Moss Point and Pascagoula. Concentrations of Hispanic/Latino(a) populations are less evident, though the majority appear to be living in south Biloxi and east Pascagoula. The majority of the Asian population appears to live in south and east Biloxi (See Figure 3.3). When comparing the locations of concentrations of minority populations to the white population, however, the concentrations appear to be in the same areas. This is likely an indication of population centers as opposed to areas of extreme concentration of any one racial group. There do appear, however, to be many more White people living in Ocean Springs and the jurisdictions in Hancock County than minority groups (See Figure 3.4).

Figure 3.1: Black/African American Population



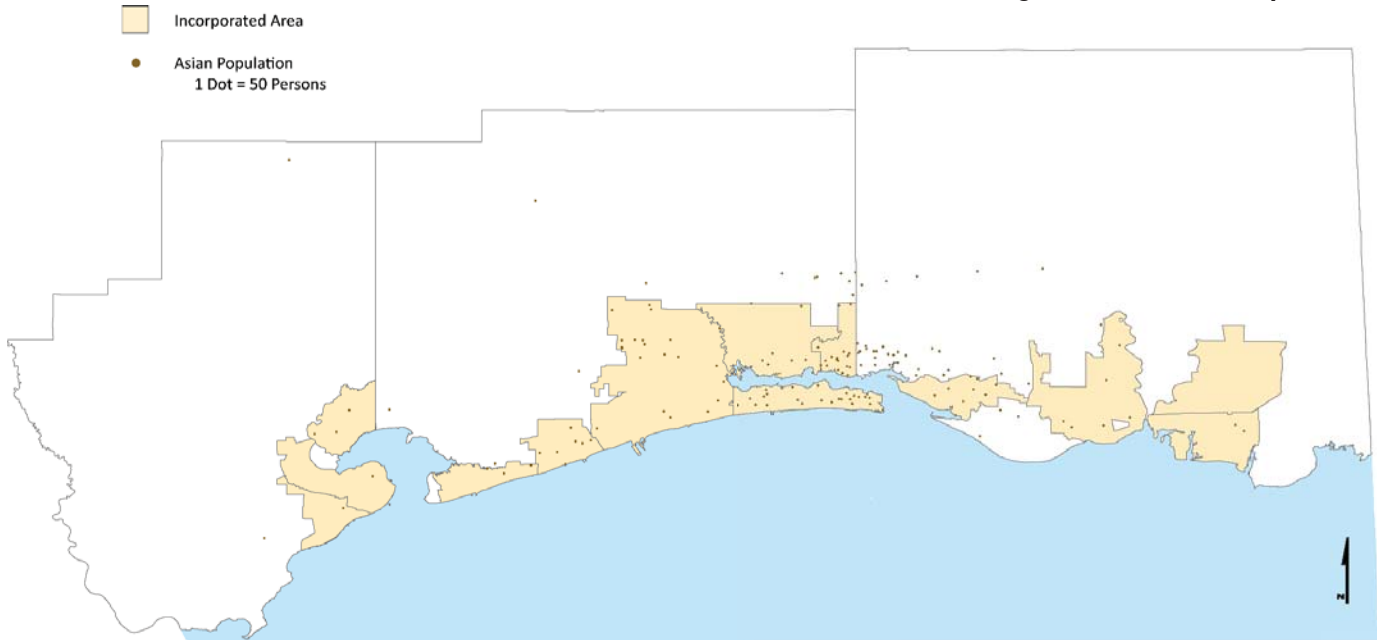
Source: 2010 Census

Figure 3.2: Hispanic/Latino(a) Population



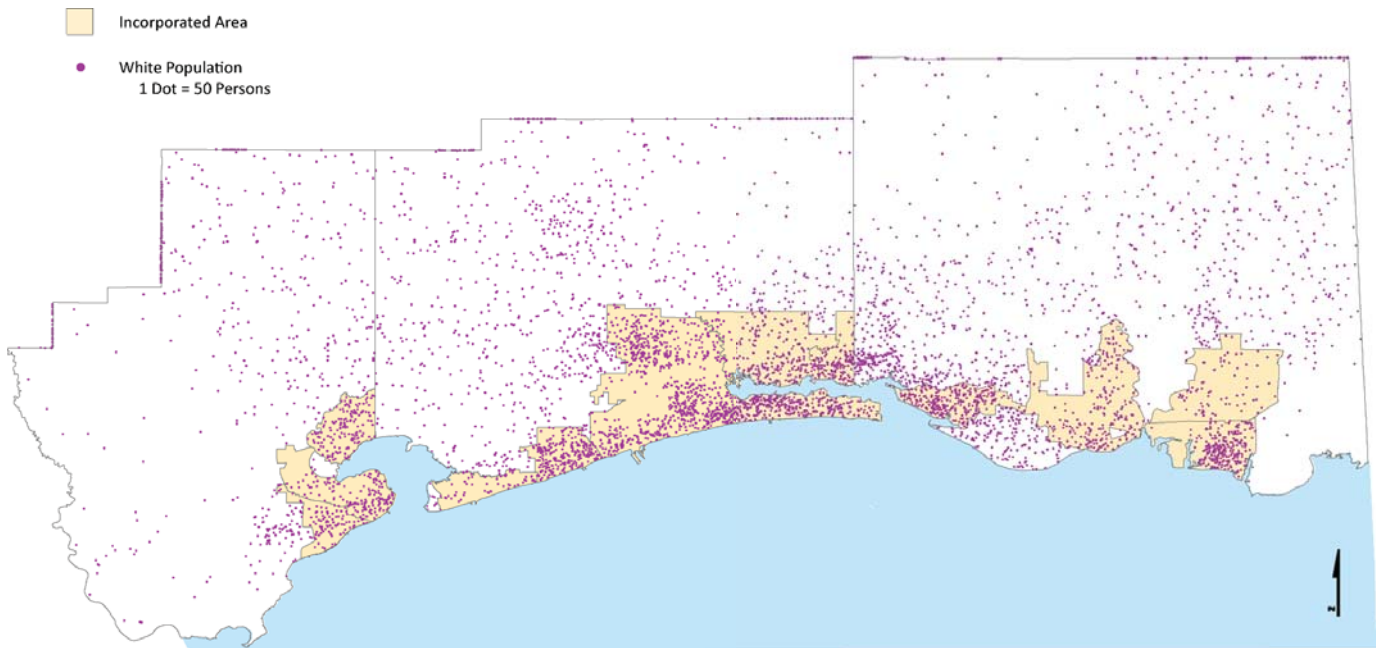
Source: 2010 Census

Figure 3.3: Asian Population



Source: 2010 Census

Figure 3.4: White Population



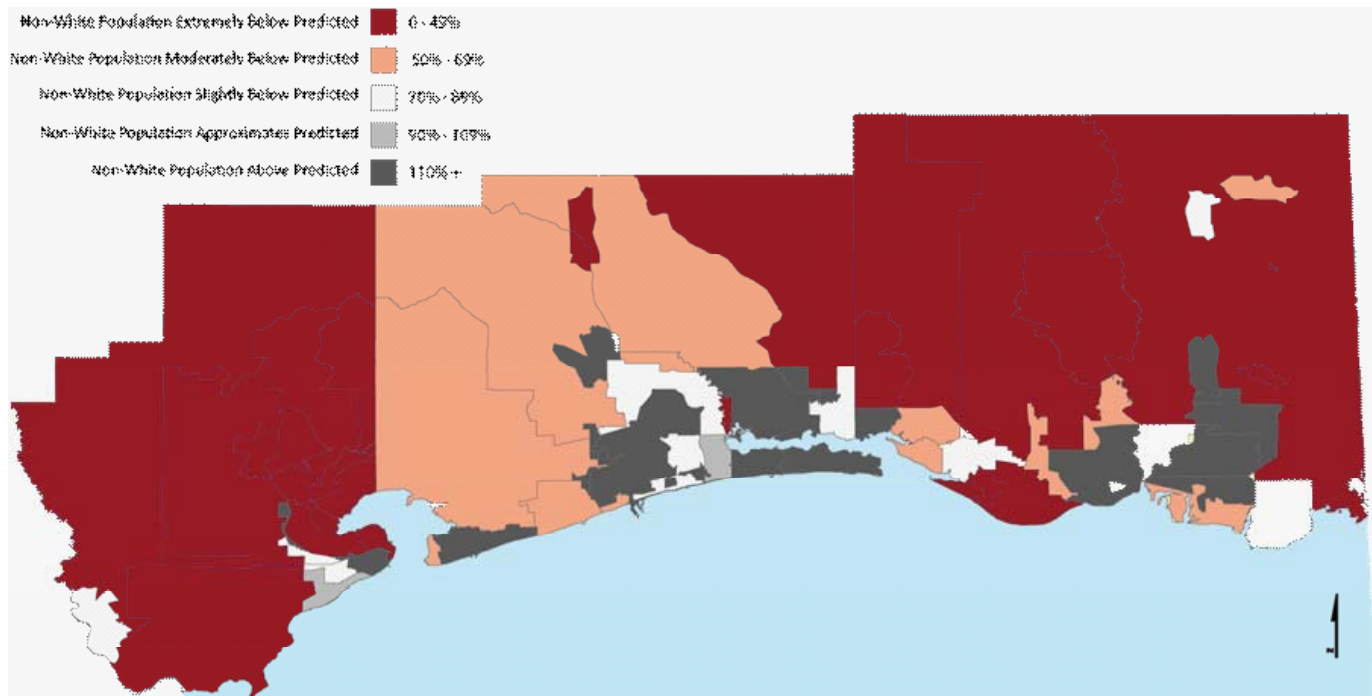
Source: 2010 Census

3.4 Predicted Racial and Ethnic Composition Ratio

Another method of analyzing segregation or integration is the Predicted Racial/Ethnic Composition Ratio. This is the ratio between the predicted or expected racial composition of a community and the actual composition. It is a summation of the number of households in each income category in a given area proportional to the metropolitan areas. The Predicted Racial/Ethnic Composition Ratio is intended to answer the following question – Given the current household income for the jurisdiction, what would we expect the racial/ethnic composition to look like? Scores closest to 1 (or 100%) indicate that the jurisdiction is close to its predicted level of minority composition or that the jurisdiction is close to representing a racial/ethnically integrated or diverse area. Scores far above 1 (or 100%) show that the composition is far greater than one would expect and thus segregation may exist, while scores far below 1 (or close to 0) show that the composition is far less than one would expect and thus segregation may exist.

Figure 3.5 shows the predicted racial/ethnic composition for the region. This map shows that the vast majority of the region's rural and suburban communities have a non-white population that is moderately to extremely below the predicted population. This may suggest that racial segregation exists in these areas/communities. Conversely, the more urban areas have a non-white population that is slightly above the predicted population. The results from this mapping exercise closely mimic the results from the results from the dot density maps above.

Figure 3.5: Predicted Racial/Ethnic Composition



Source: HUD.2010 Census

3.5 Contributors to Segregation

Communities in the Mississippi Gulf Coast Region have made tremendous strides in the past several decades to address policies and programs that have contributed to segregation and continue to proactively monitor and encourage residential integration. There is, however, still evidence of persistent residential racial segregation stemming from a nearly century-long legacy of laws that mandated or reinforced the physical separation of the races. Less overt discriminatory practices in marketing, lending, and insurance have also played a role. The passage of the Fair Housing Act did not alter these patterns overnight, but did offer the opportunity to integrate residential areas. In addition to historic conditions, the role of post-Katrina rebuilding, economic pressures, and individual choice have also contributed to the existing landscape of segregation on the coast.

Governmental practices and laws at the federal, state and local level have contributed to residential segregation. At the federal level, the Federal Housing Administration used race as a basis for denying mortgages to minority applicants and explicitly redlined neighborhoods to create and perpetuate racial segregation starting in the 1930's. In addition, state-level Jim Crow laws set up racially segregated societies in Mississippi in the 19th century. Mississippi enacted 22 Jim Crow statutes and laws pertaining to voting rights, miscegenation, and school and railroad segregation between 1865 and 1956. Mississippi cities and towns also perpetuated segregation, commonly along physical barriers like rivers, major roads or railroad tracks, with whites on one side and blacks on the other. Another longstanding tendency was for whites to occupy more desirable beachfront property while blacks occupied more flood-prone marshland. Although these acts have all been repealed, they have undoubtedly helped shape the existing housing patterns.

Decades after the Fair Housing Act was enacted in 1968, unlawful housing discrimination in south Mississippi has continued to appear from time to time. Within the past twenty years, both private and public landlords have been found to have committed racial discrimination in various ways. These include denial of rental housing on the basis of race, disability, or familial status, evictions based upon race, and steering of racial minority tenants to substandard housing. Following Hurricane Katrina, several local jurisdictions enacted exclusionary zoning ordinances that limited development of single-family housing. See Section 6.4 for a more detailed analysis of zoning regulations in the region. Additionally, several jurisdictions adopted or tried to adopt resolutions or policies resulting in exclusionary moratoriums on multi-family rental construction and other barriers to affordable housing in ways that may have had discriminatory effects upon racial minorities, persons with disabilities, or both.

As segregation laws came under attack, racially restrictive covenants were written into property deeds to allow residents to privately enforce segregation. These covenants prevented blacks from purchasing, leasing or residing in certain neighborhoods. While judicial enforcement of racially restrictive covenants was held unconstitutional

by the Supreme Court in 1948, the covenants' private influence persisted between neighboring property owners. , Even though the covenants were no longer judicially enforceable, they still signaled to blacks that they would not be welcome in certain neighborhoods, reinforcing pre-existing segregation.

In addition to more formal laws and policies, economic development trends have also influenced trends in segregation. Change in the economic landscape, for example, was likely a major factor in causing the high levels of segregation now seen in Moss Point. In the 1980s, Moss Point's primary employers, including International Paper and Morton-Thiokol, left the area. As a result, many white residents who had greater economic mobility moved from Moss Point into smaller communities in northern Jackson County. This pattern repeated itself after Katrina, further reducing the white population in Moss Point.

Though less tangible, individual preference most likely has contributed to and continues to influence residential racial segregation in the region. Research shows that members of a particular ethnicity will not move into a neighborhood unless that neighborhood contains a sufficient number of residents of that ethnicity. To the extent that segregated residential areas have become embedded in this region as a result of the factors already described, the influence of individual preference may tend to reinforce segregation, despite the opportunities guaranteed by the Fair Housing Act.

While the causes of segregation discussed above do shed light on current housing opportunity challenges in the region, it is important to note that the sources and persistence of residential housing segregation are complicated by the ways in which these factors combine and become difficult to trace. Significant progress has been made in overcoming known contributors to segregation on the Mississippi Gulf Coast, but emerging trends and the effects of any new programs, policies or investments need to continue to be aggressively monitored. This FHEA does not explore all aspects and affects of the history of segregation in the region and a more in-depth study would be highly beneficial for the area. In addition, more can and should be done to proactively work towards increased integration across the coast and specifically in those parts of the region where higher segregation levels have been identified.

CHAPTER 4

RACIALLY CONCENTRATED AREAS OF POVERTY

Racially Concentrated Areas of Poverty (RCAP) are defined as census tracts that contain:

1. A family poverty rate greater or equal to 40 percent, or a family poverty rate greater or equal to 300 % of the metro region's tract average (whichever is lower); and
2. A majority (greater than 50 percent) non-white population.

Since racial and ethnic segregation can result in concentrations of poverty because of income gaps, it is important for the region to both identify and understand its RCAP. Figure 4.1 displays the geographic location of RCAPs within the Mississippi Gulf Coast Region. In total, there are five RCAPs within the region. Three RCAPs are located in Gulfport and one each in Biloxi, Harrison County, Long Beach and Pascagoula.

4.1 Population Distribution by Race

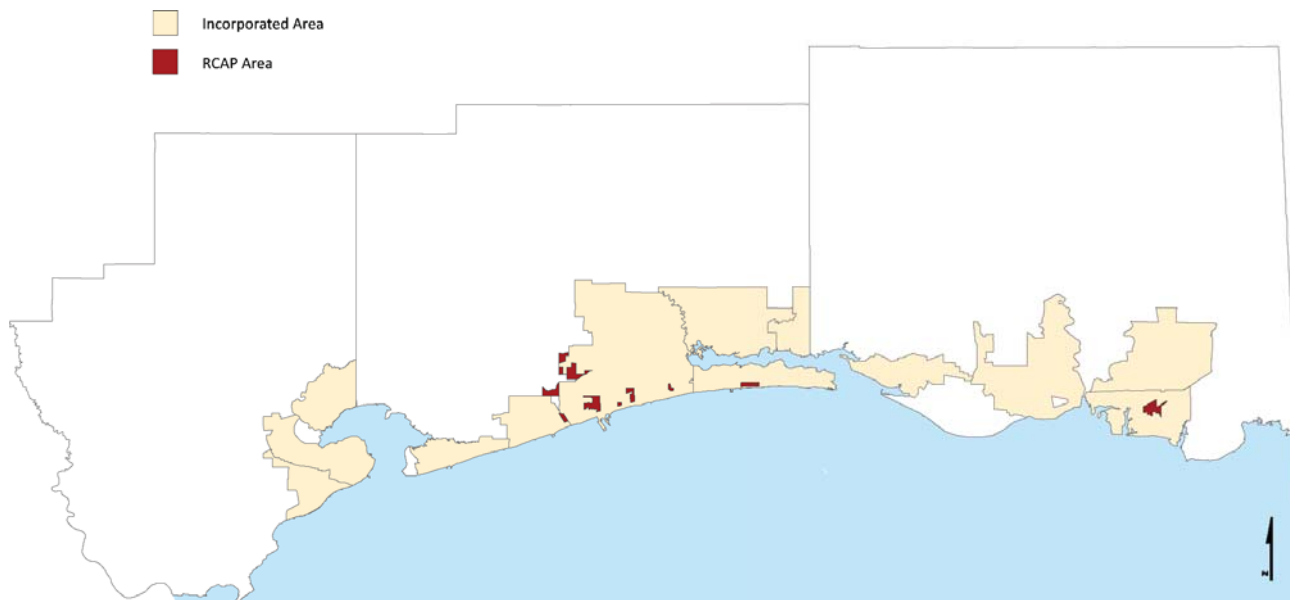
Table 4.1 shows that 2.2% of the region's population lives in a Racially Concentrated Area of Poverty. Black and Hispanic populations are more likely to live in RCAPs than other races: 7.40% of the total Black/African American population and 4.61% of the total Hispanic/Latino population live in RCAPs.

Table 4.1: Population by Race in RCAPs Compared to the Total Population

	Population in 3 Coastal Counties	Population in RCAPs	% Population in RCAPs
White	269,943	1,757	0.65%
Black or African American	74,565	5,520	7.40%
Hispanic or Latino	17,761	818	4.61%
Asian	8,764	15	0.17%
American Indian or Alaska Native	1,641	17	1.04%
Native Hawaiian or Pacific Islander	363	0	0%
Total Population	370,702	8,167	2.20%

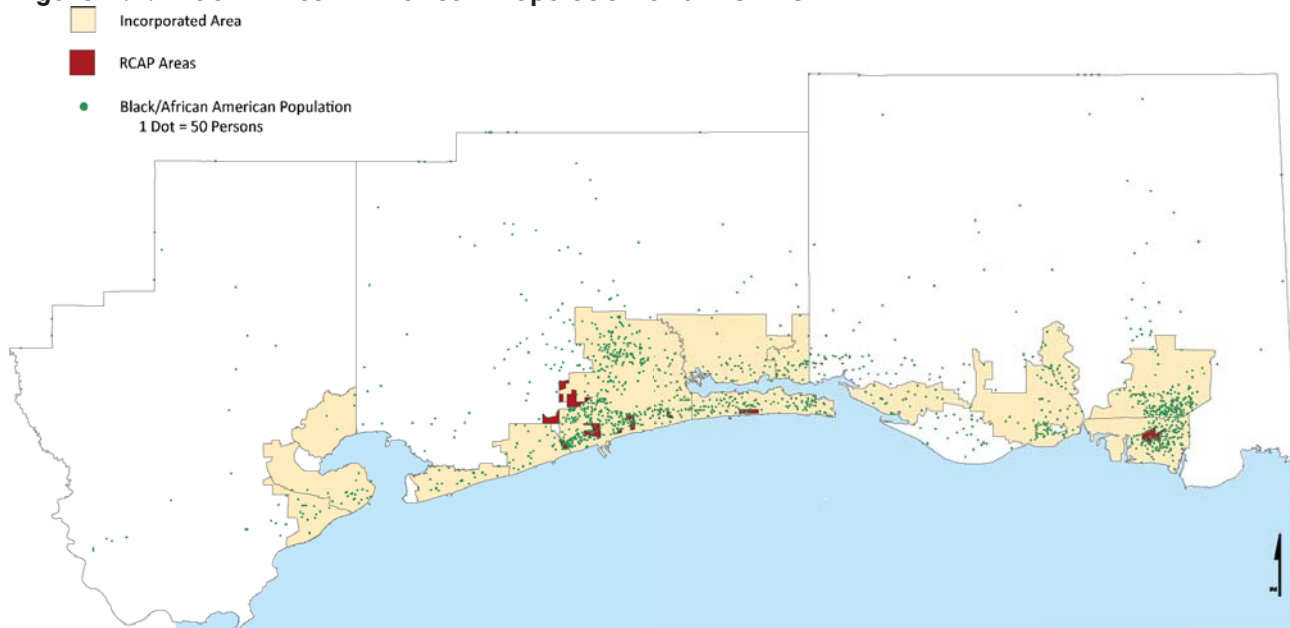
Source: HUD.2010 Census

Figure 4.1: Location of Racially Concentrated Areas of Poverty (RCAPs) in the Three Coastal Counties



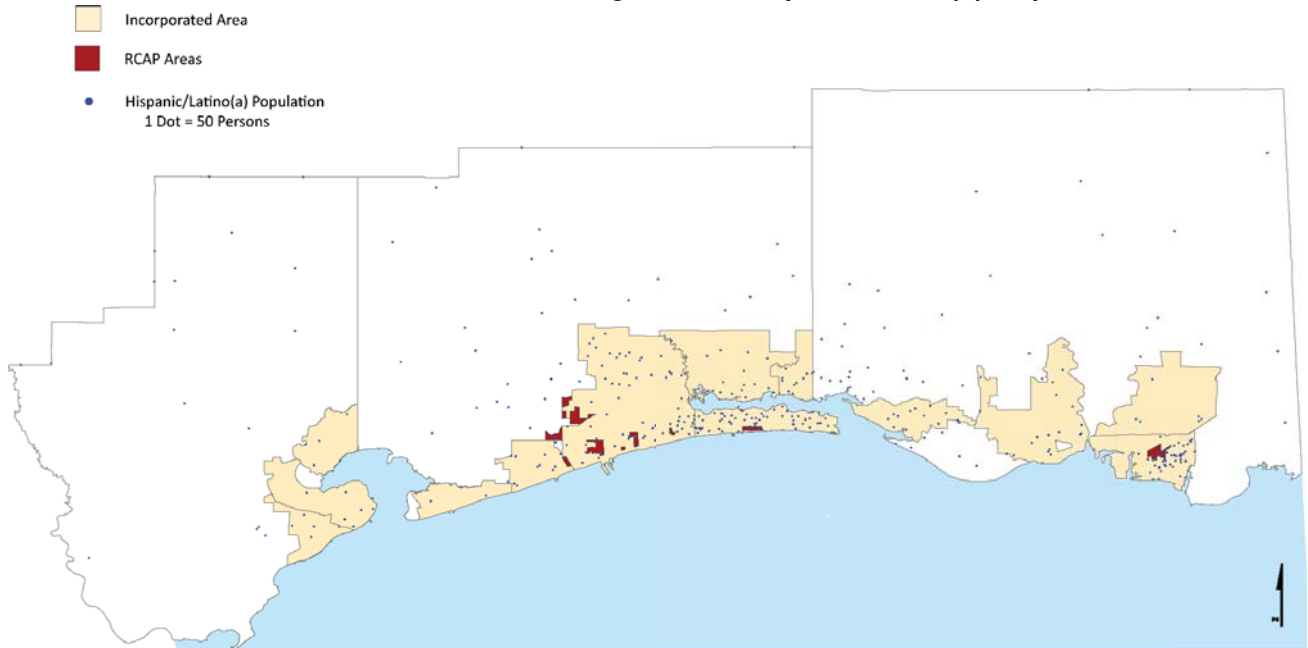
Source: HUD.2010 Census

Figure 4.2: Black/African American Population and RCAPs



Source: HUD.2010 Census

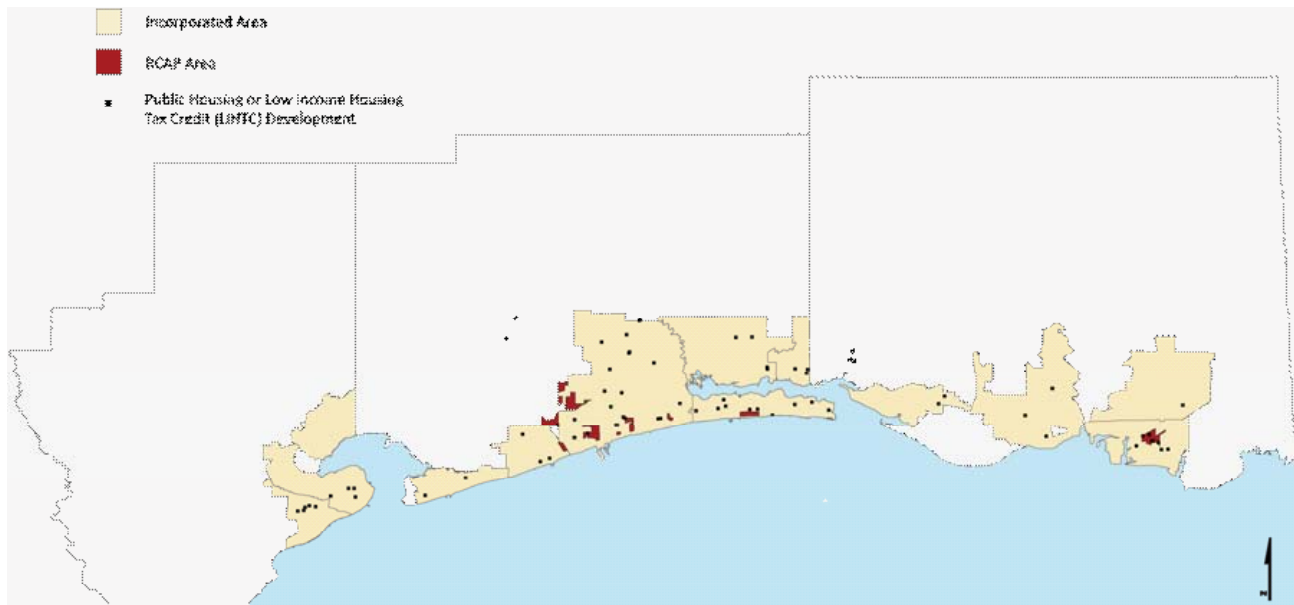
Figure 4.3: Hispanic/Latino(a) Population and RCAPs



Source: HUD.2010 Census

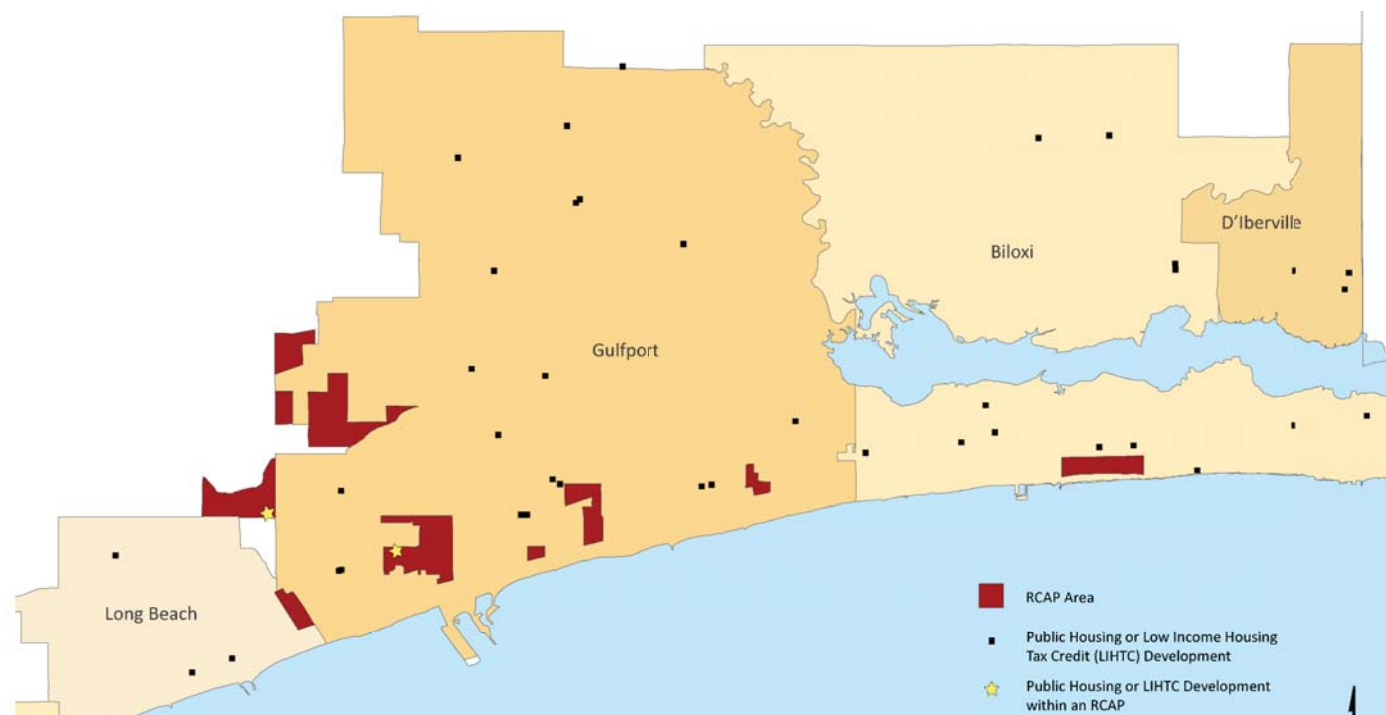
4.2 Location of Assisted Housing

In general, assisted housing developments have a tendency of being clustered in lower opportunity areas. Figure 4.4 shows the location of Public Housing and Low Income Housing Tax Credit (LIHTC) Developments in comparison with the Racially Concentrated Areas of Poverty. When looking across the Mississippi Gulf Coast Region, however, there does not seem to be a correlation between the location of these assisted housing developments and RCAPs. Of the 78 assisted housing developments in the region, only six are located within RCAPs. Those that are located outside the RCAPs are also not clustered around the RCAPs.

Figure 4.4: RCAPs and Locations of Public Housing and Low Income Housing Tax Credit Developments

Source: HUD.2010 Census. GCCDS

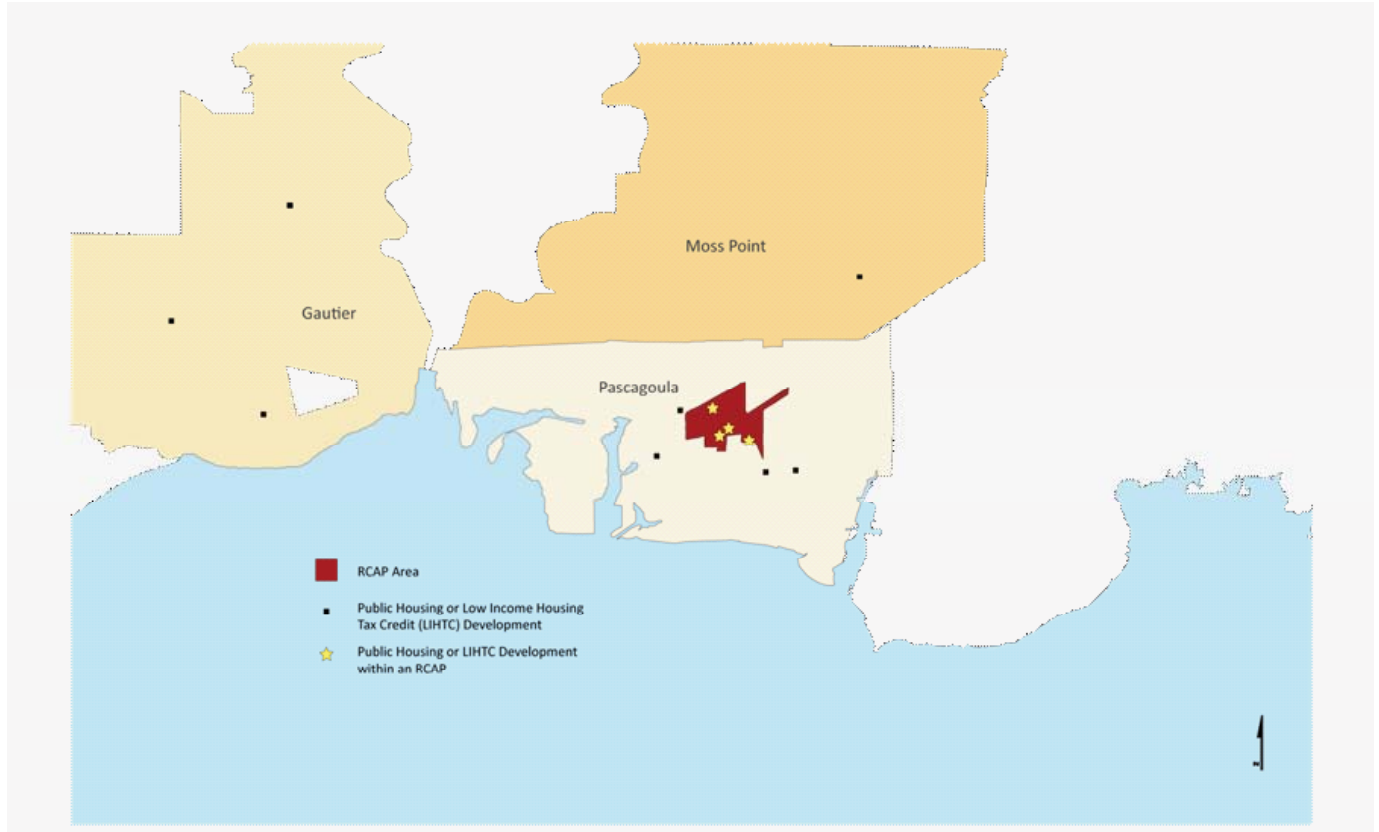
Figure 4.5 takes a closer look at the RCAPs in Harrison County and the locations of assisted housing developments. As depicted in the map, one development is located in the RCAP in Harrison County and one is located in an RCAP in Gulfport. The development in Harrison County is Canal Pointe Homes, an 80 unit development that was built in 1957. The development in Gulfport is Stonegate, a 44 unit development that was built in 2005.

Figure 4.5: RCAPs and Assisted Housing in Harrison County

Source: HUD.2010 Census. GCCDS

Figure 4.6 takes a closer look at the RCAPs in Pascagoula and the locations of assisted housing developments. This area is more of a concern as four of the eight assisted housing developments in Pascagoula are located in the RCAP. The four developments in the RCAP are Haywood Brooks Addition, built in 1961 with 85 units; Taylor Heights Apartments, built in 2009 with 144 units; Morrison Village, built in 2009 with 120 units; and Bartlett Bayou, built in 2005 with 48 units.

Figure 4.6: RCAPs and Assisted Housing in Jackson County



Source: HUD.2010 Census. GCCDS

RCAPs are further explored in Section 5: The Geography of Opportunity in the Mississippi Gulf Coast.

CHAPTER 5

THE GEOGRAPHY OF OPPORTUNITY IN THE MISSISSIPPI GULF COAST REGION

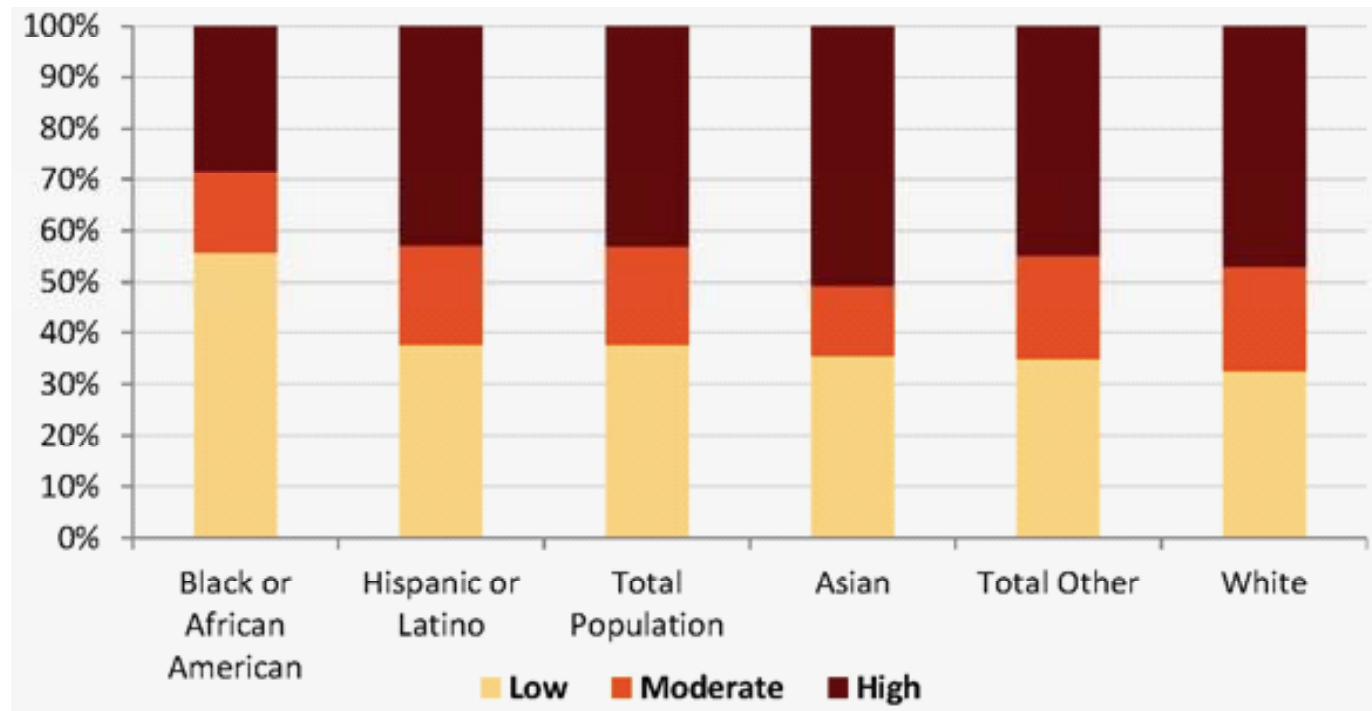
The Kirwan Institute for the Study of Race and Ethnicity has been a vital partner in the *Plan for Opportunity* and has led the consortium in a process they have developed over the past ten years known as Opportunity Mapping. This process has and will continue to be extremely important to the *Plan for Opportunity* both in terms of the resources produced and the insight gained from the extensive community engagement incorporated into the mapping work. In the case of this FHEA, the Opportunity indicators and maps for the Mississippi Gulf Coast region are being used to analyze access to existing areas of high opportunity.

5.1 Background and Process

The Kirwan Institute began working with the Consortium for a Sustainable Gulf Coast and local groups early in 2011 to define a set of indicators that would describe the geography of opportunity for the Mississippi Gulf Coast region. For the purpose of this process, opportunity was defined as “a situation or condition that places individuals in a position to be more likely to succeed or excel.” During the process, stakeholders met repeatedly to decide on, develop, and refine the data they wanted to include as part of the opportunity maps. The result being a set of indicators and maps that was created within and by the community it intends to represent.

Five categories of indicators were chosen to present a comprehensive picture of opportunity in the region, with an emphasis on equity as one of the three essentials of sustainability (Equity, Economy and Environment). To this end, the Comprehensive Opportunity Index includes the following categories: Public Education, Economics & Mobility, Housing, Socioeconomics, and Public Health & Security. Each category is a composite of four to five indicators gathered at the local, state and national level (See Figure 5.1).

Each category was mapped across the region and can be analyzed individually or as part of the comprehensive opportunity map. The comprehensive map is designed to weave together the data from each of the separate categories to provide a more holistic understanding of opportunity within the region (See Figure 5.2). All five indicator categories were equally weighted within the comprehensive opportunity map in order to represent how each aspect of opportunity is important to the overall health and vitality of the places within the region. Weighting indicators is also a challenge because it is a subjective process that requires extensive justification. While

Figure 5.3: Opportunity Geography by Population Proportions

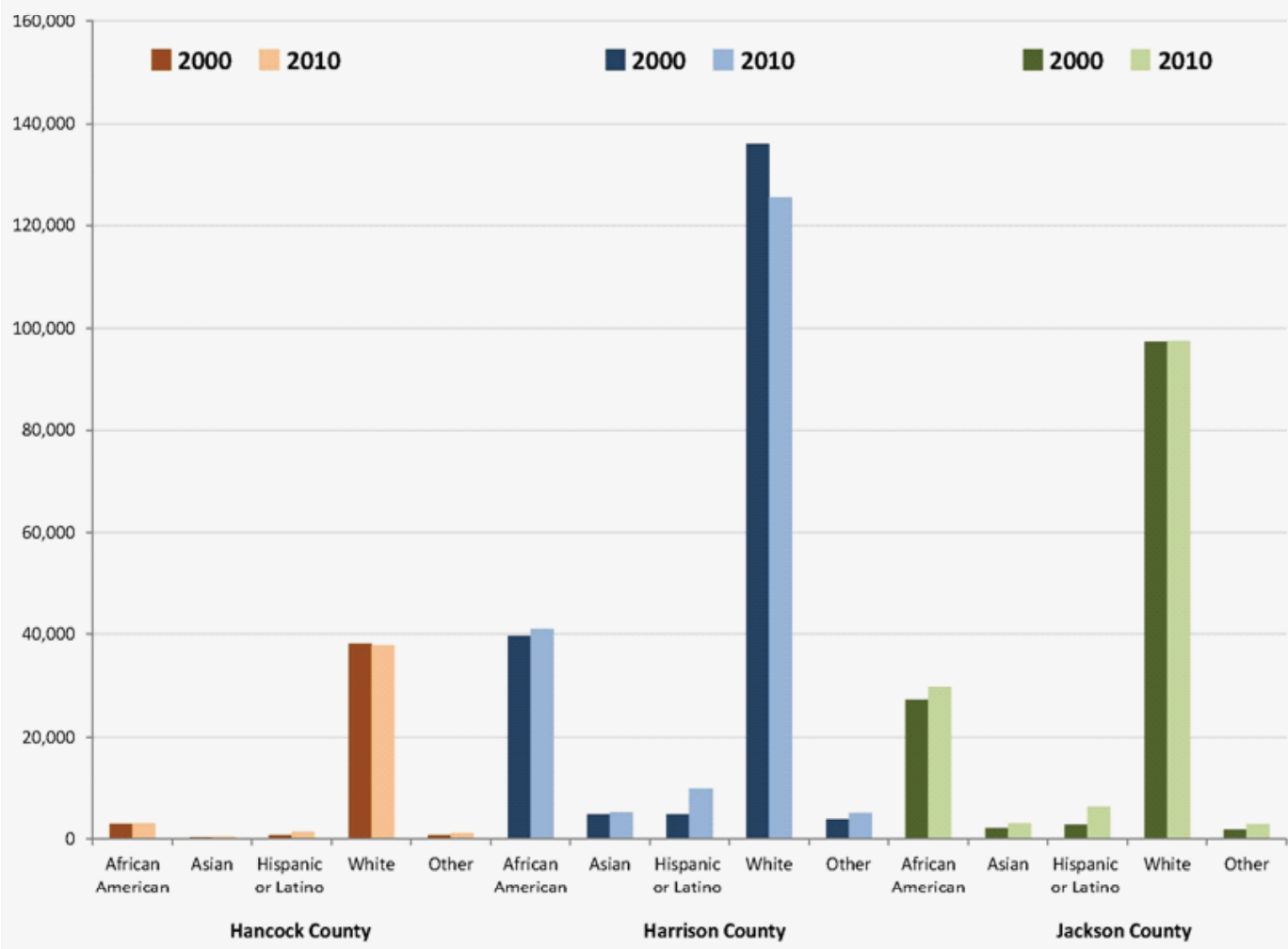
Source: Kirwan Institute. 2010 Census

5.2 Regional Opportunity by Race and Ethnicity

As part of its final report, The Kirwan Institute conducted an initial analysis of population and demographic trends in relation to areas of high and low opportunity. Table 5.1 gives a breakdown of the opportunity areas where different race populations live while Figure 5.3 provides a visual of the data consolidated into three categories: low, medium and high opportunity.

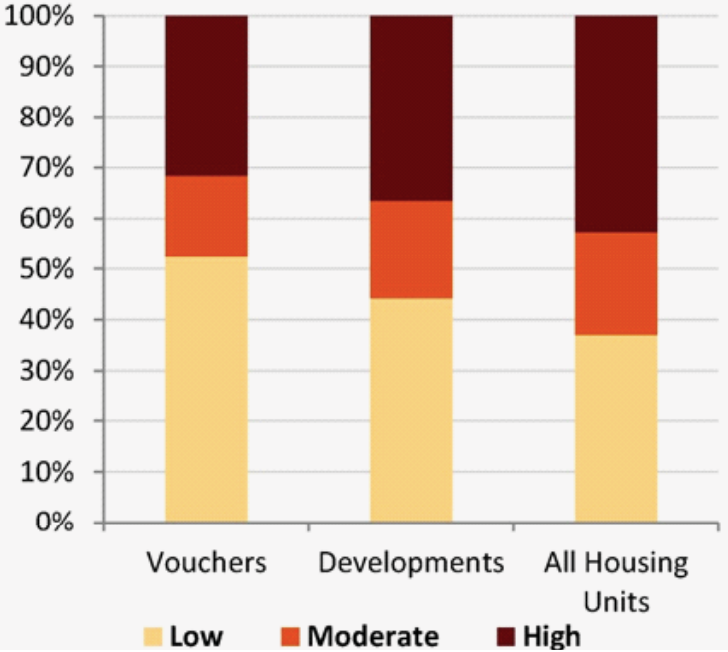
Kirwan's analysis shows that nearly 140,000 people or 38% of the region's population live in an area of low or very low opportunity. When considering race and access to areas of opportunity the most notable finding is that 55.8% of the Black/African American population in the region live in areas of low to very low opportunity as compared to the Asian (35.4%), Hispanic/Latino (37.7%), White (32.6%) or "Other Races" (34.9%) populations living in areas of low to very low opportunity. The Asian population currently has the highest percentage of people living in areas of high and very high opportunity. Over 50% of the Asian population in the region falls into this category followed by 47% of the White population, 44.7% of "Other Races" and 42.9% of the Hispanic/Latino population.

Figure 5.4: County Population Change by Race, 2000–2010



Source: Kirwan Institute. 2010 Census

Figure 5.5: Housing Opportunity Geography by Type



Source: Kirwan Institute. HUD. 2010 Census

The current wellbeing of the different race populations in terms of access to opportunity becomes even more important when considering trends in population change. Figure 5.4 shows the population change by race for each county. The chart makes it clear that the region's growth is due primarily to increases in non-White and Hispanic/Latino populations. According to Kirwan's report:

The trends reflected in the racial composition of the population change mimic national trends and do not appear to be fading. This means that as the population continues to grow, the health and vitality of the region will be increasingly tied to a more racially diverse population.

As previously noted, the region is becoming more diverse and because these patterns do not appear to be fleeting, it is very important that they are given adequate weight when determining strategies that will improve access to opportunity and drive future investments in the region.

5.3 Assisted Housing and Access to Opportunity

The Kirwan report also looked at assisted housing in regards to access to opportunity. Assisted housing developments including public housing developments and Low Income Housing Tax Credit (LIHTC) developments, as well as Housing Choice Voucher (HCV) locations were considered in the analysis. Figure 5.5 shows the relationships between assisted housing locations and three categories of opportunity: low, medium and high.

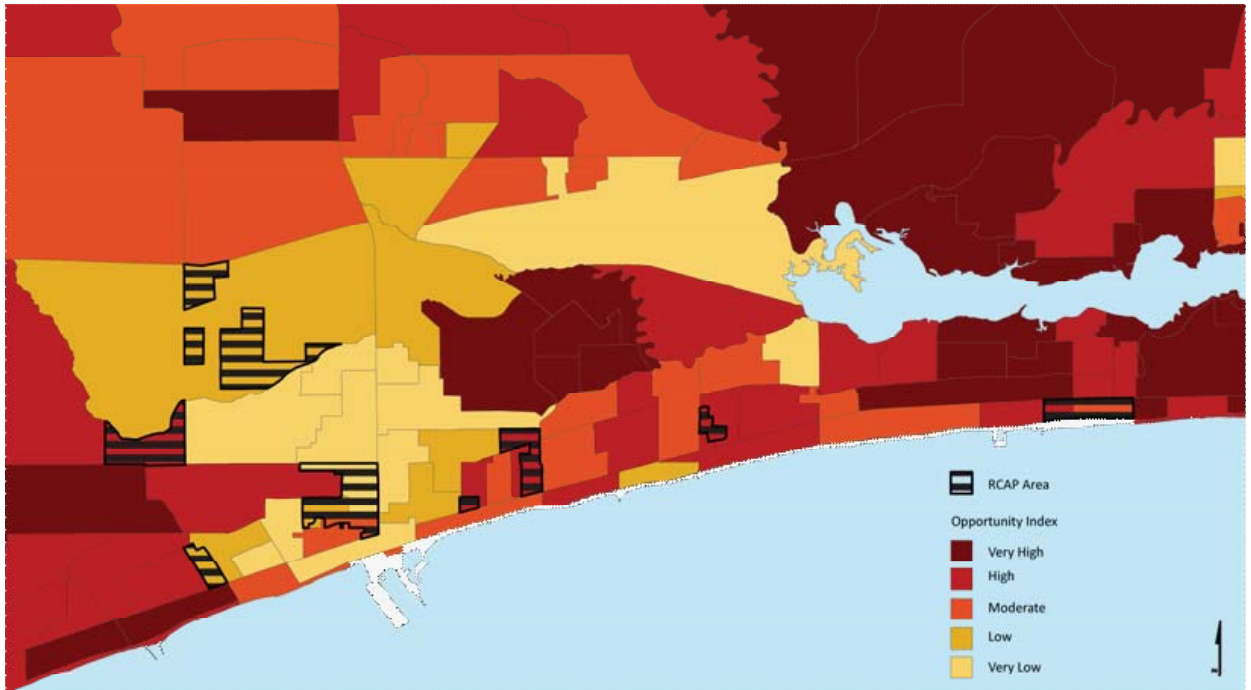
The analysis reveals that assisted housing, both housing developments and vouchers, are disproportionately located in areas of low opportunity compared with other housing in the region. The location of these assisted housing options in area of low opportunity may further impede these households' ability to rise out of poverty.

5.4 RCAPs

Racially Concentrated Areas of Poverty (RCAP) are defined as census tracts that contain:

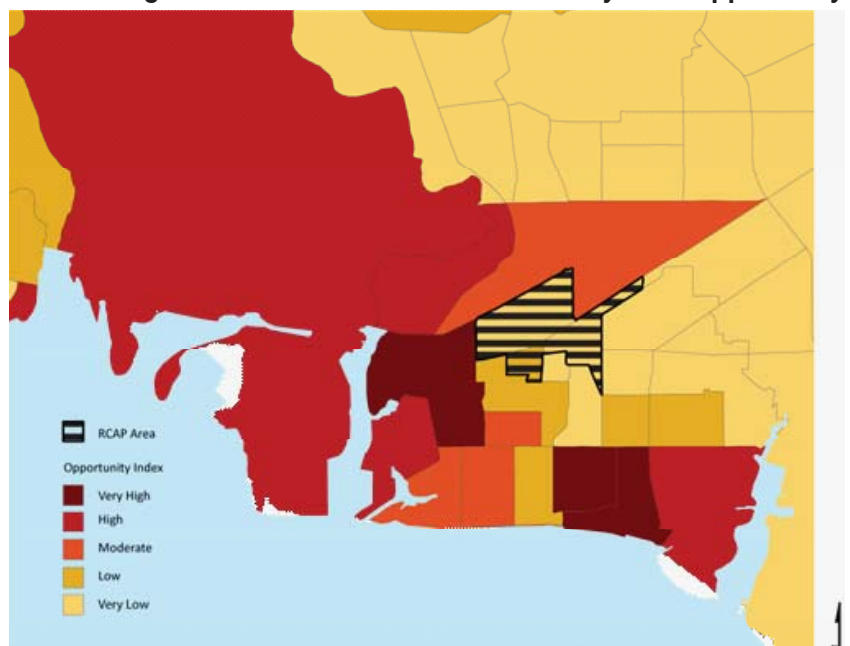
1. A family poverty rate greater or equal to 40 percent, or a family poverty rate greater or equal to 300 % of the metro region's tract average (whichever is lower); and
2. A majority (greater than 50 percent) non-white population.

The importance of understanding RCAPs for the region and a detailed analysis is discussed in Section 4 of this Fair Housing and Equity Assessment. This section will look at RCAPs in relation to access to opportunity across the region. In total, there are 5 RCAPs within the region. Three RCAPs are located in Gulfport and 1 each in Biloxi, Harrison County, Long Beach and Pascagoula. Looking at the RCAPs in terms of their access to opportunity will provide another useful way to identify priority areas to focus investment strategies.

Figure 5.6: RCAPs in Harrison County and Opportunity

Source: Kirwan Institute. HUD. 2010 Census, Map by GCCDS

Figure 5.6 shows all of the RCAPs in Harrison County and their relation to opportunity. Several of these RCAPs are in areas of high opportunity which means that while many of the residents in these areas are currently living in poverty, they are geographically in a good position to have access to opportunities that may assist them in improving their situations. These residents may still be having difficulty accessing this opportunity and programmatic strategies may be necessary to bridge this gap. The RCAPs in Gulfport, however, have very low to low access to opportunity and are, perhaps, areas to focus strategic investment or initiate policy change to improve local opportunity structures.

Figure 5.7: RCAP in Jackson County and Opportunity

Source: Kirwan Institute. HUD. 2010 Census, Map by GCCDS

Figure 5.7 shows the RCAP in Pascagoula in Jackson County. The RCAP is in an area of very low to low opportunity. This RCAP was also identified as an area of concern in Section 4 because of the concentration of assisted housing developments located within its boundaries. Residents in this area are not well positioned to rise out of a state of poverty and strategies should focus on improving access to opportunity for these residents. Strategies for this type of situation may include place-based investments as well as increasing mobility-based housing options.

The RCAPs in Pascagoula and Northwest Gulfport both were in areas of low and very low opportunity. When looking at the different opportunity indicators for these areas they both had very low scores for socioeconomic opportunity. As a result, the Economic and Workforce Development Subcommittee and Transportation and Land Use Subcommittee decided to survey residents of these specific RCAPs to find out more about barriers to employment and access to transportation (See Appendix B). While the survey is not statistically valid, it provides insight into the problems, perceptions and opportunities that may be impacting workforce engagement.

In the Pascagoula RCAP, 119 working age (age 16 and over) residents participated in the survey. When asked to choose among specific “barriers to employment,” 31.8% responded that transportation problems are an issue. For 18.2% discrimination is an issue and 13.6% did not identify any of the potential barriers listed. Other choices selected include Previous Work Experience and Family Health Problems. Of the people surveyed, there are more people unemployed and not looking for work than there are those unemployed and looking for work. Of those not looking for work, 33.3% say the primary cause is No Childcare, 22.2% have a Temporary Illness or Injury, and 22.2% are Caring for a Spouse, Parent or Other Family Member. When asked specifically about transportation, many respondents reported having been greatly inconvenienced by their lack of reliable transportation and were unable to reach recreational activities, health care services, school or work. More frequent bus service was requested by 66% of respondents and 23% requested more and better maintained bus stops.

In the Northwest Gulfport RCAP, 141 working age (age 16 and over) residents participated in the survey. When asked to choose specific “barriers to employment,” 35.7% said that Child Care Options are a problem. Credit/Financial issues, Criminal History, Education Level, Family Health Problems and Transportation options were all listed as barriers by 14.29% of respondents. Only 5.67% of respondents in this survey area reported being unemployed and not looking for work. Reasons identified include Caring for a Spouse, Parent or Other Family Member, Enrollment in Education or Training Program, and No Transportation to and from Work.

In addition, the Gulf Coast Community Design Studio and Steps Coalition held a focus group of residents and community leaders in Pascagoula on October 30, 2013. Eight residents of Pascagoula attended the focus group representing such organizations as the National Association for the Advancement of Colored People, Parents for Public Schools, and United Way for Jackson and George Counties.

Residents went over the findings of the FHEA and the results from the survey done in Pascagoula, and were asked to share their reactions to the information and to discuss some of the causes and possible solutions.

Residents were not surprised with the findings of the FHEA in regards to the RCAP in Pascagoula or the results of the survey exploring barriers to employment. It was suggested that including seniors in the survey might be skewing the high percentage of residents unemployed and not looking for work. Several residents, however, made the point that many of their clients and persons they come in contact with are “employable,” but are not looking for work because of the benefits and subsidies they currently receive. There was also extensive discussion around the existence of Limited English Proficiency (LEP) issues and the lack of an active Latino advocacy organization to support the growing Hispanic population in the area. One resident cited the extensive waiting list for free English classes at Mississippi Gulf Coast Community College’s Jackson County Campus.

Residents were also not surprised by the location of the RCAP in Pascagoula. The area apparently aligns closely with what was known as Carver Village, the historically Black neighborhood and housing project in Pascagoula. Residents spoke of historic segregation in this particular location, though very little had been formally studied or documented regarding these residential patterns and discriminatory practices. Further consideration of these patterns and practices would greatly enhance the understanding of this particular RCAP.

Residents felt that investment in workforce development and K-12 education would greatly benefit the area. They also saw a strong need to support of the growing Hispanic population. Transportation was cited as a huge need in the area and investment in public transportation was seen as a way of increasing access and opportunity. Finally, participants were very concerned about addressing the cycles of poverty that could be holding residents back. As residents and leadership work to bring opportunity to residents in this area of Pascagoula it will be important to monitor the status of this RCAP. As the RCAP data for this FHEA was provided by HUD, it is recommended that HUD provide RCAP data for past and subsequent years for the region so that these RCAPs can be better understood and monitored.

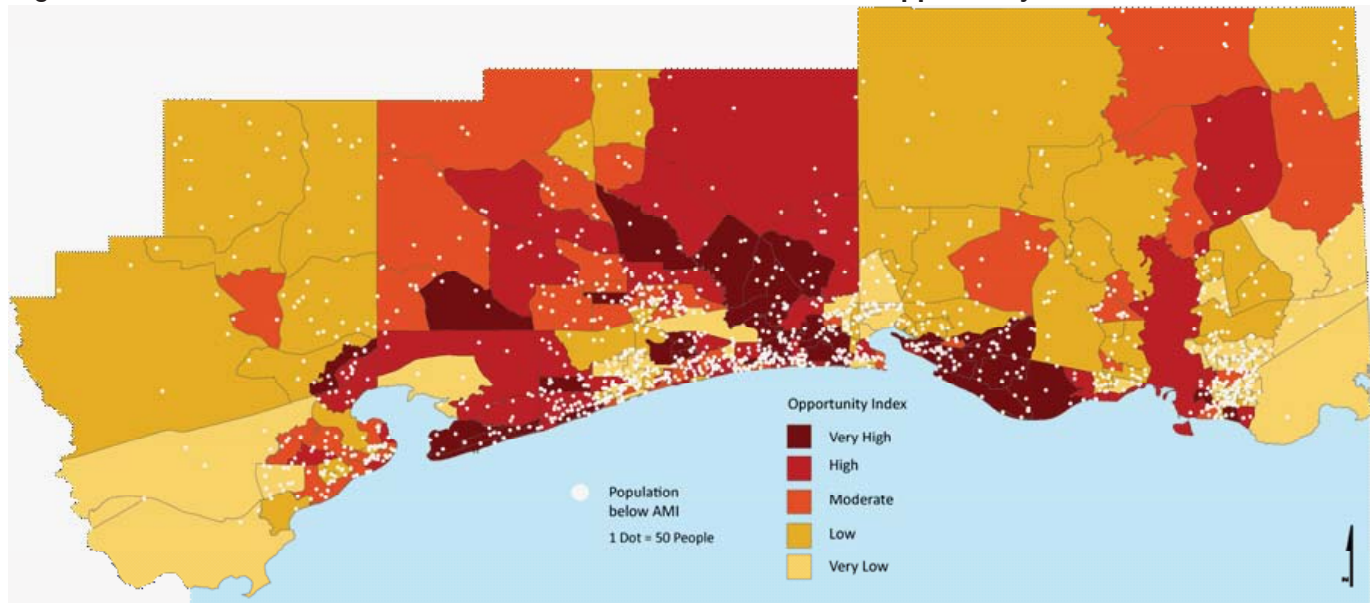
5.5 Income

While RCAPs do take into account persons of lower income, this analysis will also take a closer look at where the population with household incomes below the Area Median Income (AMI) regardless of race are living in relation to areas of varying opportunity. Table 5.2 and Figure 5.8 show the breakdown of the population living below AMI by opportunity level and geography. Table 5.2 shows that the population is pretty evenly distributed across opportunity levels. This, however, does not mean that there is not a need to increase this population’s access to opportunity. When looking at Figure 5.8 we see that there are pockets of persons living in poverty that are in areas of low and very low opportunity. The combination of low income and low opportunity decreases this population’s ability to rise out of poverty.

Table 5.2: Households with Incomes below AMI and Access to Opportunity

Opportunity	Household Income Below 45K	
Very High	11767	17.6%
High	12432	18.6%
Moderate	14492	21.7%
Low	15031	22.5%
Very Low	12956	19.4%
Total	66678	

Source: Kirwan Institute. 2010 Census, Map by GCCDS

Figure 5.8: Households with Incomes below AMI and Access to Opportunity

Source: Kirwan Institute. 2010 Census, Map by GCCDS

5.6 Seniors and Persons with Disabilities

The senior population and persons with disabilities are two other minority groups that have special needs and vulnerabilities that should be considered in terms of access to opportunity. The population over the age of 65 has been increasing on the coast post-Katrina and the well-being of this group needs to be given special attention when planning for an equitable future. Historically, Mississippi has institutionalized its population with disabilities and has not been proactive in providing access to community inclusion or opportunities in general. These populations were not initially considered in the Kirwan report, but will be looked at closer in this section.

Table 5.3 and Figure 5.9 show where seniors age 65 and over are living in relation to areas of opportunity. Table 5.3 indicates that seniors are pretty well distributed across all levels of opportunity as the percent of senior in any given level of opportunity varies at most by 8 percentage points. In addition, 46.7% of seniors are currently living in areas of high to very high opportunity. The senior population age 85 and over was also analyzed due to their increased vulnerability. The results were very

similar to the senior population age 65 and over (See Table 5.4). This, however, is not to say that special priority should not be given to all seniors in relation to increasing their access to opportunity. When looking geographically across the region there are pockets where concentrations of seniors are living in areas of low and very low opportunity. This can be seen especially in eastern Pascagoula, Moss Point and western Gulfport. Seniors in much of Hancock and Jackson Counties also appear to be at a disadvantage. It would be beneficial to look to strategies that would increase seniors' access to opportunity in these geographic areas in particular.

Table 5.3: Seniors (65+) Access to Opportunity

Opportunity	Population Over 65	
Very High	10869	23.6%
High	10619	23.1%
Moderate	8376	18.2%
Low	8920	19.4%
Very Low	7194	15.6%
Total	45978	

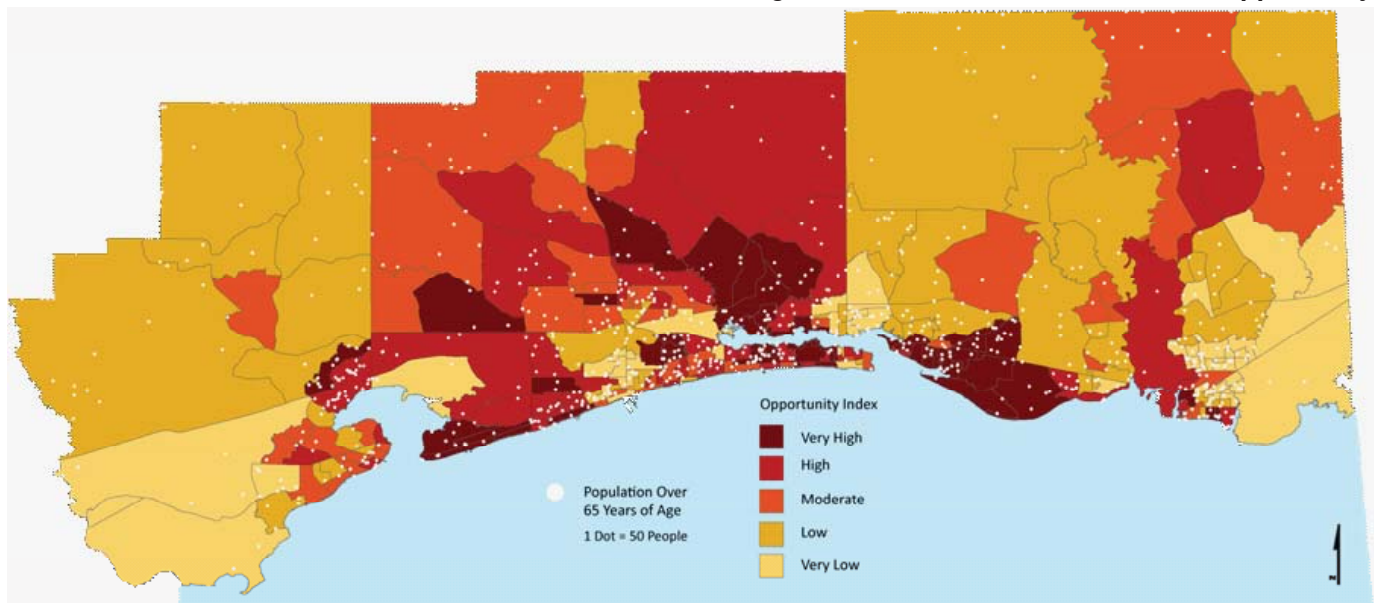
Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Table 5.4: Seniors (85+) Access to Opportunity

Opportunity	Population Over 85	
Very High	1281	28.9%
High	929	21.0%
Moderate	732	16.5%
Low	707	16.0%
Very Low	778	17.6%
Total	4427	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Figure 5.9: Seniors and Access to Opportunity



Source: Kirwan Institute. 2010 Census, Map by GCCDS

The senior population was further broken down and analyzed by race in terms of access to opportunity (See Table 5.5). This detailed analysis revealed the startling reality that 62.9% of the Black/African American senior population lives in areas of low and very low opportunity with 44.2% living in areas of very low opportunity. The senior populations of the other races are much more evenly distributed and even lean more toward areas of high and very high opportunity. It will be important to identify what barriers are contributing to this disparity in order to determine an effective strategy to improve Black/African American seniors' access to higher opportunity.

Table 5.5: Seniors by Race and Access to Opportunity

Opportunity	Black/ African American		Hispanic/ Latino		Asian		White	
Very High	631	11.3%	158	22.7%	172	25.5%	9817	25.4%
High	687	12.3%	172	24.7%	191	28.3%	9475	24.6%
Moderate	745	13.4%	142	20.4%	116	17.2%	7259	18.8%
Low	1042	18.7%	120	17.2%	113	16.8%	7532	19.5%
Very Low	2463	44.2%	104	14.9%	82	12.2%	4496	11.7%
Total	5568		696		674		38579	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Unfortunately, there is not a very accurate data set available that captures the geographic location of the disabled population. This analysis uses the population by block group receiving Supplemental Security Income according to the 2011 American Community Survey 5-year estimates as a proxy. Supplemental Security Income (SSI) is a Federal income supplement program funded by general tax revenues designed to help aged, blind, and disabled people, who have little or no income. Table 5.6 shows persons with disabilities in relation to areas of opportunity. The population seems pretty well distributed across all opportunity levels, although 43.6% of the population is living in areas of low to very low opportunity.

Table 5.6: Persons with Disabilities and Access to Opportunity

Opportunity	Persons Receiving SSI	
Very High	938	12.7%
High	1505	20.5%
Moderate	1707	23.2%
Low	1764	24.0%
Very Low	1444	19.6%
Total	7358	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

In 2011, the United States Department of Justice (DOJ) conducted an investigation of the State of Mississippi's Service System for persons with mental and physical disabilities and found that:

The State of Mississippi has failed to meet its obligation under Title II of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§12131-12134, and its implementing regulations, 28 C.F.R. pt. 35, by unnecessarily institutionalizing persons with mental illness or DD in public and private facilities and failing to ensure they are offered a meaningful opportunity to live in integrated community settings consistent with their needs.

In addition, Mississippi's service system for persons with disabilities is the most "institution-reliant" in the nation. When persons with disabilities are confined to institutions for longer than necessary periods of time they are not given the opportunity to reach their full potential and find their place within the community. Community inclusion for persons with disabilities has not only been found to be beneficial to the individuals, but has been shown to be the most cost-effective method for providing the assistance they need. The State currently operates six institutions for persons with disabilities through the Department of Mental Health. Only one of these institutions, the South Mississippi Regional Center in Long Beach, is located in the three coastal counties. There is also a Specialized Treatment Facility in Gulfport.

The DOJ is currently working with the State of Mississippi on a plan for transitioning persons with mental and physical disabilities out of institutions and into the community. There are, however, many barriers to re-entry as pointed out in the memorandum. The two main barriers are a lack of appropriate housing and a lack of community services. Interestingly, Mississippi was one of the first states to develop what is known as an Olmstead Plan in response to the Supreme Court's decision in *Olmstead v. L.C.*, 527 U.S. 581 (1999) that required that individuals with disabilities receive the appropriate services in the most integrated setting possible and encouraged states to develop plans for accomplishing this mandate. According to the DOJ's investigation, however, Mississippi's Olmstead Plan was never adequately funded or implemented. Implementing the State's Olmstead Plan and facilitating community inclusion for persons with disabilities should be one of the region's priorities for increasing equity and access to opportunity.

5.7 Elements of Opportunity and Inequality

Kirwan's report looked at the population in terms of race/ethnicity and access to opportunity. The analysis revealed that the Black/African American population is disproportionately living in areas of lower opportunity compared with other races. This analysis will go a bit further and look at how the elements of opportunity for the Mississippi Gulf Coast Region (Education, Economic & Mobility, Housing, Socioeconomic and Public Health & Security) are affecting the various minority and high-risk populations. Tables 5.7 through 5.11 show the breakdown of these populations for the various components of opportunity.

The analysis reveals that the Socioeconomic component of opportunity is disproportionately affecting the Black/African American population's access to opportunity in general with 59.4% of the Black/African American population living in areas of low and very low Socioeconomic opportunity. This component considers indicators including poverty rate, unemployment rate, public assistance rate and educational attainment rate. The Socioeconomic component also seems to be disproportionately affecting persons with disabilities with 51.2% of the population living in areas of low and very low Socioeconomic opportunity.

The other components significantly affecting the Black/African American population are Housing with 53.7% of the population living in areas of low and very low opportunity and Education with 51.9% of the population living in areas of low and very low opportunity. Figure 5.1 lists the indicators included in the Housing and Education opportunity components. This finer-tuned analysis can be used to develop more effective strategies to increase the Black/African American population's access to opportunity.

The analysis also reveals that the senior population is most affected by the Public Health and Security component of opportunity with 47.1% of the population living in areas of low and very low Public Health and Security opportunity. The Public Health and Security component considers indicators including proximity to toxic release, proximity to healthy food, proximity to parks and open space, fire hazard index and CRS premium discount rate. Many of these indicators are tied to urban services or areas and may be an indication that the senior population is disproportionately living in rural areas. This brings its own set of unique challenges. As with the Black/African American population, the results of this more detailed analysis can help develop more effective strategies and recommendations for increasing seniors' access to opportunity.

Table 5.7: Minority and Vulnerable Populations and Educational Opportunity

Education Opportunity	Black/African American		Asian		Hispanic/Latino		Population Over 65		Persons Receiving SSI		Income Below AMI	
Very High	11270	15.1%	1975	22.5%	3428	1.9%	10389	22.6%	1668	22.7%	11809	17.7%
High	12035	16.1%	2139	24.4%	4611	26.0%	7209	15.7%	1683	22.9%	12047	18.1%
Moderate	12573	19.9%	1421	16.2%	3222	18.1%	11254	24.5%	1842	25.0%	14480	21.7%
Low	19996	26.8%	1379	15.7%	3940	22.2%	7514	16.3%	1044	14.2%	15020	22.5%
Very Low	18691	25.1%	1850	21.1%	2560	14.4%	9612	20.9%	1121	15.2%	13322	20.0%
Total	74565		8764		17761		45978		7358		66678	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Table 5.8: Minority and Vulnerable Populations and Economic & Mobility Opportunity

Economic & Mobility Opportunity	Black/African American		Asian		Hispanic/Latino		Population Over 65		Persons Receiving SSI		Income Below AMI	
Very High	16016	21.5%	1752	20.0%	3473	19.6%	8249	17.9%	1113	15.1%	11569	17.4%
High	16024	21.5%	2083	23.8%	3949	22.2%	9997	21.7%	1621	22.0%	12532	18.8%
Moderate	13986	18.8%	2670	30.5%	3899	22.0%	10277	22.4%	1525	20.7%	14165	21.2%
Low	12528	16.8%	1268	14.5%	2772	15.6%	9430	20.5%	1645	22.4%	14215	21.3%
Very Low	16011	21.5%	991	11.3%	3668	20.7%	8025	17.5%	1454	19.8%	14197	21.3%
Total	74565		8764		17761		45978		7358		66678	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Table 5.9: Minority and Vulnerable Populations and Housing Opportunity

Housing Opportunity	Black/African American		Asian		Hispanic/Latino		Population Over 65		Persons Receiving SSI		Income Below AMI	
Very High	8231	11.0%	1803	20.6%	3077	17.3%	12364	26.9%	2059	28.0%	16255	24.4%
High	11349	15.2%	2311	26.4%	4181	23.5%	11652	25.3%	1277	17.4%	13046	19.6%
Moderate	14924	20.0%	1884	21.5%	3655	20.6%	8190	17.8%	1225	16.6%	11997	18.0%
Low	16714	22.4%	1801	20.6%	3578	20.1%	7538	16.4%	1419	19.3%	12606	18.9%
Very Low	23347	31.3%	965	11.0%	3270	18.4%	6234	13.6%	1378	18.7%	12774	19.2%
Total	74565		8764		17761		45978		7358		66678	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Table 5.10: Minority and Vulnerable Populations and Socioeconomic Opportunity

Socioeconomic Opportunity	Black/African American		Asian		Hispanic/Latino		Population Over 65		Persons Receiving SSI		Income Below AMI	
Very High	9258	12.4%	2064	23.6%	3540	19.9%	11547	25.1%	899	12.2%	13448	20.2%
High	9985	13.4%	1772	20.2%	3594	20.2%	9672	21.0%	1192	16.2%	16043	24.1%
Moderate	11023	14.8%	1478	16.9%	3143	17.7%	9689	21.0%	1496	20.3%	13773	20.7%
Low	18125	24.3%	1983	22.6%	3506	19.7%	8467	18.4%	1862	25.3%	13255	19.9%
Very Low	26174	35.1%	1467	16.7%	3978	22.4%	6603	14.4%	1909	25.9%	10159	15.2%
Total	74565		8764		17761		45978		7358		66678	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

Table 5.11: Minority and Vulnerable Populations and Public Health & Security Opportunity

Public Health & Security Opportunity	Black/African American		Asian		Hispanic/Latino		Population Over 65		Persons Receiving SSI		Income Below AMI	
Very High	9872	13.2%	1757	20.0%	3610	20.3%	6827	14.8%	1851	25.2%	14973	22.5%
High	13004	17.4%	1725	19.7%	3274	18.4%	8561	18.6%	1503	20.4%	14513	21.8%
Moderate	21740	29.2%	1613	18.4%	3977	22.4%	8908	19.4%	1721	23.4%	13285	19.9%
Low	21496	28.9%	2078	23.7%	4074	22.9%	10860	23.6%	1097	14.9%	12838	19.3%
Very Low	8453	11.3%	1591	18.2%	2826	15.9%	10822	23.5%	1186	16.1%	11069	16.6%
Total	74565		8764		17761		45978		7358		66678	

Source: Kirwan Institute. 2010 Census, Analysis by GCCDS

5.8 Barriers to Accessing Opportunity

The analysis of opportunity in the region both geographically and in terms of minority and vulnerable populations has led to the identification of key areas to focus strategies for improving opportunity in an area or improving a population's access to existing opportunity. Recommended strategies, however, also need to take into account the existing barriers to opportunity. This section will discuss some of the barriers that are common for the region.

Income

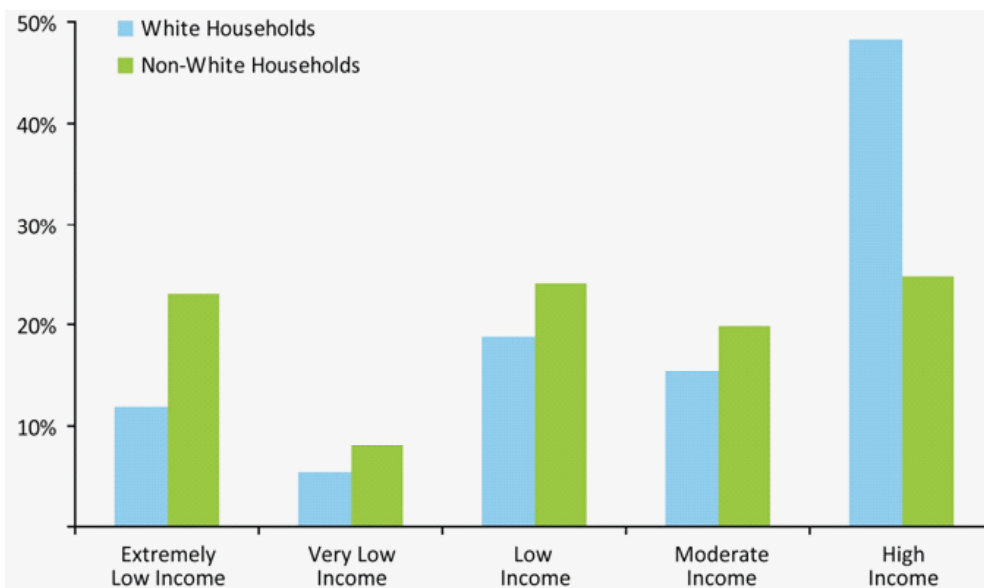
Income is a well-known barrier to opportunity in the region. As discussed in Section 2 of the FHEA, the Mississippi Gulf Coast has a higher unemployment rate and lower household median income than the national average. In addition, a significant portion of the population lives below the area median income (See Table 5.12). Looking at the distribution of household income between races highlights even wider income disparities. As shown in Figure 5.10, nearly half of all white households are high income households. In contrast, less than a quarter of non-white households are high income households. There are twice as many non-white extremely low-income households than white households.

Table 5.12: Distribution of Household Income

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	High Income
Gulfport-Biloxi MSA	14.7%	5.4%	20.9%	16.8%	42.2%
Pascagoula MSA	13.7%	6.8%	18.5%	25.5%	35.4%
Gulfport-Biloxi-Pascagoula CSA	14.3%	6.0%	20.0%	16.5%	43.2%

Source: American Community Survey. (2010). ACS 1-Year Estimates. Gulfport-Biloxi-Pascagoula CSA. Table B25106. Tenure By Housing Costs As A Percentage Of Household Income In The Past 12 Months.

Figure 5.10: Household Income Distribution by Race



Source: 2010 ACS 1-Year Estimates. Table B19001. Gulfport-Biloxi-Pascagoula CSA

Many residents on the coast are stuck in part-time and/or low-wage jobs causing them to struggle with day-to-day necessities like housing and preventing them from building wealth through savings, home ownership, and educational attainment. Access to opportunity cannot be addressed without a solid strategy for economic and workforce development.

Affordable Housing

Many of the lowest income residents cannot afford even subsidized rental housing such as Low Income Housing Tax Credit (LIHTC) units. Unlike Public Housing, the rents for LIHTC units are not income dependent and many people rely on additional assistance through the Housing Choice Voucher (HCV) program to make housing affordable. Currently, not as many people who need HCVs are able to obtain them and waiting lists remain long (See Table 5.13)

Figure 5.13: Housing Choice Voucher Recipients and Waiting Lists

Public Housing Authority	HCV Recipients		HCV Waiting List	
	Mar 2012	Oct 2012	Mar 2012	Oct 2012
MS Region VIII Housing Authority	4,557	4,557	7,000	6,061*
Biloxi Housing Authority	570	570	50 (capped)	55 (capped)
Bay Waveland Housing Authority	378	380	300	205

**Approximately 51% (3091) of the total waiting list for Region VIII is for the three coastal counties. It is unclear how many people on the Region VII waiting list are also on the Biloxi Housing Authority's and/or Bay Waveland Housing Authority's waiting lists. Currently, 39 people on the Region VII waiting list live in Bay St. Louis and 394 live in Biloxi, although this is not necessarily an indication that they have applied to more than one HCV program.*

Recent studies do not necessarily show a lack of affordable housing stock, but rather highlight the challenges of getting people into existing housing. Some of this is due, in part, a lack of HCVs that could get more people into available rental housing. Another component, however, is the lack of financial and homeowner education.

Financial and Homeowner Education

Without adequate knowledge of personal financial management and homeownership processes, many residents on the coast are unprepared or unqualified for otherwise viable housing options. Likewise, many are unable to improve their financial situations and are more vulnerable to predatory lending. There are several nonprofit and financial institutions working to address these issues. Mercy Housing, Visions of HOPE, Hancock Resource Center, CLIMB, and HOPE CDA all offer homeowner education and some financial management and credit repair counseling. Financial institutions such as Regions Bank and The Peoples Bank offer financial management resources and training and have been partnering with public schools to try to address financial literacy from a younger age. While these organizations are doing great work, additional funding and capacity is needed to deal with the enormity of the problem.

Predatory Lending

Predatory lending has historically been a problem in the region and is still a barrier to fair housing and opportunity. In 2004, Mississippi had the top three highest market shares for subprime refinancing in the United States, two of which were on the coast (Pascagoula, 42.2 percent, and Gulfport, 41.3 percent). Predatory lending was also identified as one of the top impediments to fair housing choice in all of the most recent analyses of impediments for entitlement jurisdictions on the coast. Predatory lending disproportionately affects the non-white and particularly African American/Black population on the coast. Prior to Hurricane Katrina, poverty and home ownership rates for African American Residents in coastal Mississippi were disproportionately worse than for white populations, in part due to predatory lending practices. The 2010 Census indicates that this is still the case.

Mississippi also has the largest “unbanked” population in the nation. The unbanked population is disproportionately young, non-white and low income. These “unbanked” households more frequently resort to alternative financing services such as check-cashing stores and pawnshops. Use of these alternative financing services is extremely costly and can trap users in a cycle of increasing debt. In addition, use of these services does not allow one to build credit.

Fair Housing

Fair housing issues are an ongoing challenge for the region and the state of Mississippi as a whole, particularly because there is no permanent HUD and state supported fair housing organization designated to serve the needs of the region and/or state. While HUD’s Mississippi office can investigate fair housing complaints, it is not in a position to aggressively examine local practices or to provide needed outreach and education. The Gulf Coast Fair Housing Center was one of the main organizations on the coast dedicated to providing fair housing education and enforcing fair housing laws, but closed late in 2012 due to lack of funding. The University of Southern Mississippi’s Institute for Disability Studies (IDS) provides fair housing information and intakes complaints on a grant-cycle basis, but these grant-funded services are only provided when funding is available.

Legacy Problems

Legacy problems such as having a criminal record or carrying debt are frequently a barrier to qualifying for housing and/or attaining employment. There is no hard local data to support the link between having a criminal record and having difficulty in accessing housing or employment, however, discussions with social service case managers and housing agency directors in the region attest to the reality of this barrier. In addition, the Legal Action Center published a report in 2004 that looked at legislation and policies in each state in terms of criminal reentry into society. Mississippi was ranked 38 with 1 being the state that afforded past criminals the most opportunity to reenter society and 50 being the state that had the most barriers to reentry.

Carrying debt in one form or another is common for most Americans. However, when one's debt becomes too large or significantly affects one's credit score it becomes more and more difficult to qualify for housing. According to HMDA data, the top reason for denial of mortgage loan applications on the Mississippi Gulf Coast is credit history, followed by debt-to-income ratio. Debt can also affect one's ability to access rental housing. It is not uncommon for landlords and property management companies to do a credit check as part of the tenant screening process.

Cycle of Poverty

Mississippi has long been one of, if not the poorest states in the nation and many residents on the coast find themselves stuck in a cycle of poverty. This "generational poverty" as it is often called occurs when one is raised in a family that has been impoverished for two or more generations and is different than "situational poverty" which is usually caused by a particular set of events such as chronic illness or divorce. Many studies have been done looking at the affects of growing up in poverty and some regions have even done studies looking specifically at the effects and potential solutions for generational poverty in their area. Individuals in these cycles of poverty often stay in poverty because they do not see a way out or do not feel they have access to the resource or people they need to help them along the way. Outside intervention and education is often needed to help one escape this devastating cycle.

CHAPTER 6

FAIR HOUSING

The 1968 Fair Housing Act established federal protections for minorities seeking to rent or purchase a home. The law was amended in 1988 to include additional protected groups and expand the enforcement powers of the government. The goal of this policy is to make housing choice a reality through Fair Housing Planning (FHP). Federal Fair Housing Law also includes the Americans with Disabilities Act (ADA) of 1990.

Under Fair Housing Law, no one may discriminate against potential renters, homeowners, or loan applicants based on race, color, national origin, religion, sex, familial status, or ability. Since its passage, HUD has attempted to shift responsibility for FHP and enforcement to State, State-funded, and Entitlement jurisdictions. Jurisdictions receiving funds through HUD programs, including Community Development Block Grant (CDBG), Home Investment Partnership (HOME),

Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), are considered Entitlement Jurisdictions. There are four entitlement jurisdictions on the Mississippi Gulf Coast: the City of Biloxi, the City of Gulfport, the City of Moss Point, and the City of Pascagoula. Each of these jurisdictions, along with the State of Mississippi, is required to conduct an analysis of impediments (AI) to fair housing and document actions that “affirmatively further fair housing (AFFH)” in annual performance reports required by the Consolidated Plan regulation (24 CFR 91.520(a)). HUD suggests that jurisdictions update their AI every three to five years.

Recently, HUD has encouraged regions to engage in Fair Housing Planning in order to overcome spatial segregation between jurisdictions. Unlike the self-contained local AIs, a regional AI also examines discrimination patterns and impediment differences between jurisdictions. The agency is moving toward a regional funding model that would require regional AIs as a prerequisite for funding eligibility. This new rule is not finalized, but anticipated in the near future.

This regional housing assessment considers the existing State and local efforts to remove impediments to fair housing on the Mississippi Gulf Coast as a preliminary step toward a regional analysis of impediments. The Mississippi Gulf Coast region is not a formal governing entity, nor is it an entitlement jurisdiction; therefore, though this regional assessment examines regional impediments to fair housing, it does not abrogate local analysis and reporting requirements.

6.1 Fair Housing Agencies and Programs

For the purpose of this report, fair housing agencies are defined as organizations that intake clients with housing discrimination complaints and provide education and outreach about fair housing laws, policies, and resources. In both the State and local AIs, many agencies and organizations are listed as fair housing agencies, but would need additional capacity to conduct outreach or intake complaints. Examples of such agencies include Gulf Coast Community Action Agency, Jackson County Community Action Agency, and Mississippi Center for Justice. Additionally, the Mississippi Center for Legal Services, which is often listed as a fair housing service provider, no longer operates the Fair Housing Center or the Fair Housing Education and Outreach Project. Conversely, the University of Southern Mississippi Institute for Disability Studies (IDS) is not identified in any of the AIs, even though the organization intakes fair housing complaints. This is likely due to inconsistent funding over the years. The three current fair housing providers on the coast are:

U.S. Department of Housing and Urban Development

The HUD Fair Housing Initiatives Program (FHIP) funds organizations and non-profits that assist people who are potential victims of housing discrimination. FHIP also promotes fair housing laws and equal housing opportunity awareness through the Fair Housing Organizations Initiative, the Private Enforcement Initiative, the Education and Outreach Initiative, and the Administrative Enforcement Initiative which provide fair housing capacity building, technical assistance and other support to governments, agencies and individuals. HUD also intakes housing discrimination complaints. The HUD Fair Housing and Equal Opportunity (FHEO) website provides information about fair housing and how to file a complaint. Residents can also call, email or mail a complaint to FHEO.

Gulf Coast Fair Housing Center

The Gulf Coast Fair Housing Center (GCFHC) was one of the main organizations on the Mississippi Gulf Coast dedicated to providing fair housing education and enforcing fair housing laws. GCFHC was a nonprofit organization that was formed in 2003 by the National Fair Housing Alliance and services the six lower counties in Mississippi. GCFHC educated residents about their rights under Fair Housing laws through various workshops and media. The Center also responded to fair housing complaints from individuals. Complaints were researched and investigated by Center staff and either resolved internally or filed with HUD. GCFHC bore a major share of the effort to further fair housing in the three coastal counties, but closed late 2012 due to lack of funding.

University of Southern Mississippi Institute for Disability Studies Housing Smart: Next Generation

University of Southern Mississippi Institute for Disability Studies (IDS) provides

fair housing information and intakes complaints on a grant-cycle basis. Complaint intake services are therefore only provided when funding is available. Complaints are processed by IDS staff via phone, as well as in person, and are forwarded to HUD to be researched and investigated. The IDS main office is located in Hattiesburg, with other office facilities in Long Beach and Jackson.

IDS is currently funded as a fair housing provider, but was unfunded between 2009 and 2011. From 2011 to 2012 IDS provided fair housing services through a HousingSmart grant. When the grant ended in November 2012, IDS entered into a contract with Mississippi Development Authority (MDA) through the end of 2013 to continue its focus on fair housing by conducting fair housing and ADA compliance education and outreach activities, technical assistance (including assessments for local governments and not-for-profit agencies) in conjunction with the MDA's Disaster Recovery Division to fulfill the mutual goal of promoting and increasing Mississippians' knowledge and awareness of fair housing laws.

6.2 Evaluation of State-level Fair Housing Planning

The State of Mississippi's most recent AI was conducted in 2008 and the State is currently working on an update for 2012. The 2008 State AI found that the primary impediments to fair housing included a lack of awareness of fair housing rights and services on the part of the general public as well as those directly involved in housing development and management; confusion between fair housing and affordable housing policies; discriminatory terms and conditions to rental agreements; failure to make reasonable accommodations for the disabled; high mortgage loan denial rates for select minorities, particularly African Americans; predatory lending; steering in the home purchase market; discriminatory policies in housing disaster recovery areas; and lack of an adequate fair housing delivery system. Many of the same impediments were identified by each of the four Entitlement Jurisdictions in their respective AIs, confirming that these impediments are present on the Gulf Coast and not just in other areas of the State.

HUD strongly encourages States and localities to adopt and enforce local fair housing laws. Mississippi is one of the few remaining states without state-level fair housing legislation. As a result, housing discrimination complaints and cases are formally resolved at the federal level, through HUD. The 2008 State AI found that the lack of a state-level housing service delivery system resulted in limited access to the fair housing complaint system and an impediment to fair housing. The fact that an average discrimination complaint takes nearly a year to resolve is evidence that routing cases through the federal system is inefficient and burdensome for residents. The State AI strongly recommended consideration of state-level fair housing legislation as a means to enabling a state-level fair housing enforcement agency that could expedite claims and respond more urgently to fair housing needs. However, fair housing legislation has yet to be proposed in the State of Mississippi.

Complaint and Compliance Review

The complaint review process is the main mechanism for identifying and correcting violations of Fair Housing law. Occasionally, the Gulf Coast Fair Housing Center has acquired funding to perform accessibility audits to assess the region's current compliance with Fair Housing law. Funding for this type of research, however, is limited and the last audits were completed in 2004. In general, aside from site plan review and responding to complaints, compliance with Fair Housing law is also not within the regular scope of work of jurisdictions' code enforcement officials. Because the region relies so heavily on the complaint review process to identify areas to further Fair Housing, this assessment looks at the current process and tries to identify potential areas where the system can be improved.

The Fair Housing Act is enforced through a collective effort by HUD, its regional offices, state and local partner agencies, non-profit fair housing professionals, and the Department of Justice. These partnering organizations work to identify major sources of housing discrimination and address them systemically. The National Fair Housing Alliance (NFHA) annually surveys Fair Housing intake professionals and estimates that nationally less than 1% of fair housing violations are being filed and even less are being investigated. While this is only an estimate, and one based on national data, it does raise the important issue of unreported complaints. Again, this becomes a concern when the primary means for addressing Fair Housing issues is through data gathered from reported complaints.

The southern planning district, which includes the three coastal counties and the Gulf Coast Fair Housing Center service area, received 42% of all complaints filed state-wide between 2004 and 2008. These statistics may be an indication of more prevalent housing discrimination on the Coast, or merely a reflection of population concentration. The ability the GCFHC had to intake and file complaints could also be another reason for the higher numbers of reported complaints along the coast. The State AI also states that, "the complaint system is not well utilized in several areas of the state." The GCFHC only filed complaints with HUD that it was unable to resolve internally, meaning the complaint records logged for the southern district only represent a portion of total housing discrimination complaints filed on the Gulf Coast.

Between 2005 and 2010, a majority of complaints cases closed in the three coastal counties were based on race (37%), followed by disability (29%). At least 40% of all complaints were related to discrimination against renters and nearly a quarter of the complaint cases were specifically due to alleged discrimination in the terms, conditions, and privileges of rental agreements. The other top complaint categories were coercion and failure to make reasonable accommodation. The State AI acknowledges that, "some unlawful discrimination appears to be occurring in the rental market."

HUD's Office of Fair Housing and Equal Opportunity (FHEO) is the only organization that intakes Fair Housing complaints on a consistent basis for the Mississippi Gulf

Coast region. FHEO is given up to 120 days to process a complaint from intake through investigation. However, the average length of the complaint process for the three coastal counties, between 2005 and 2010 was 11.9 months. Some cases took more than four years to resolve. As mentioned in the State AI, state-level fair housing legislation as a means to enabling a state-level fair housing enforcement agency could expedite claims.

6.3 Evaluation of Local-level Fair Housing Planning

There are four entitlement jurisdictions on the Mississippi Gulf Coast: the City of Biloxi, the City of Gulfport, the City of Moss Point, and the City of Pascagoula. The most recent Analyses of Impediments for Biloxi and Gulfport were conducted in 2007. Both cities are currently working on updates. AIs for Moss Point and Pascagoula were conducted in 2008 and 2011, respectively. These reports contain thorough analyses of local demographics and well-supported lists of impediments to fair housing. The AIs share many of the same impediments to fair housing, including predatory lending practices; a lack of education and knowledge about fair housing law; landlord discrimination in selection of tenants or terms and conditions of rental agreements; a lack of accessible housing; and the increased cost of insurance.

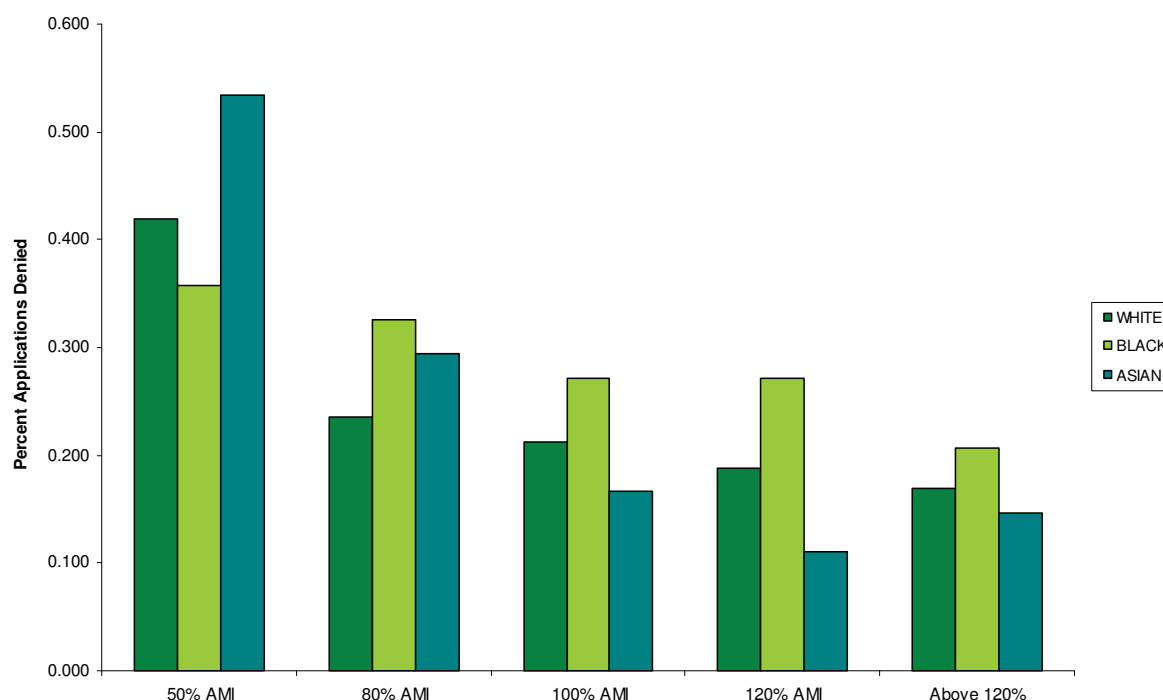
Predatory Lending

Predatory lending practices were identified in all four local AIs, as well as the State AI, as an impediment to fair housing. The State AI suggested that these practices are most common in geographic areas with high concentrations of minority populations. Local AIs found that predatory lending most often occurred because individuals and families could not qualify for traditional loans due to poor credit history, high debt-to-income ratios, or insufficient funds for down payments. However, predatory lending is also more likely to occur with lower-income individuals or families, since higher interest rates are needed to cover the cost of servicing a smaller mortgage. The local and State AIs recommend supporting and encouraging traditional lenders to provide loans to these at-risk households, and to assist first-time homebuyers with down payment and purchase assistance programs. Traditional lenders, however, cannot responsibly provide mortgages to people with poor credit or high debt-to-income ratios, and homebuyer assistance programs generally have equally stringent credit and debt standards. Thus, the at-risk population will likely continue to be challenged to qualify for non-predatory mortgages.

The City of Pascagoula proposes a progressive response to combat predatory lending practices. The City pledges to support efforts by My Home My Coast, the Homebuyer Education Center, and MDA with homebuyer education and outreach programs. The AI also recommends encouraging local credit unions and banks to initiate in-school banks to train high school students and to improve the financial literacy of the youth. The program is intended to create a more credit-worthy and financially literate adult population, though results will not be apparent for many years to come. This action clearly addresses the root cause of predatory lending and is one that could be a model for other jurisdictions in the region.

In addition to the Fair Housing Act of 1968, the federal government protects minorities from discrimination in lending practices, or red lining, through the Equal Credit Opportunity Act of 1974 and the Home Mortgage Disclosure Act (HMDA) of 1975. According to HMDA data, the top reason for denial of mortgage loan applications on the Mississippi Gulf Coast is credit history, followed by debt-to-income ratio. A slightly higher percentage of black and Asian applicants were denied (31% and 29% respectively) than white applicants (25%), but the difference is not significant enough to indicate lending discrimination. When looking at denials by income, it is clear that higher income applicants were more likely to be approved for a mortgage loan than lower income applicants. Thus, differences in the approval rate by race may be due to the reality that black and Asian households have lower incomes, on average, than white households. However, it is difficult to draw any conclusions about fair lending practices from the HMDA data for the region because the population of loan applicants is so small.

Figure 6.1: Mortgage Denial Rates, 2010



Source: Home Mortgage Disclosure Act Data. (2010). Analysis by GCCDS

Lack of Fair Housing Knowledge

The State AI and all four local AIs identified a lack of fair housing knowledge as a primary barrier to fair housing. This lack of fair housing knowledge likely spans all segments of the population including residents, landlords, planners, building code officials, developers and public officials and, thus, has far-reaching and varied implications. The cumulative impact of this lack of awareness, knowledge and education is a continuation of discriminatory and exclusionary practices – whether or not they are ill-intended. The actions recommended to combat this impediment are focused on implementing education and outreach strategies, including the creation

of fair housing websites, posters in public housing offices, informational brochures and fliers in resources centers and offices. Gulfport and Biloxi also pledge in their respective AIs to appoint a fair housing officer to assist with affirmatively furthering fair housing efforts.

Landlord Discrimination

Discriminatory treatment in the selection of rental tenants, the terms and conditions of rental agreements, and the willingness to make reasonable accommodation for the disabled are all impediments identified in all four local AIs as well as the State AI related to discrimination on the part of landlords. Landlord discrimination is a symptom of a lack of fair housing knowledge, as noted above, because many landlords and property managers do not realize their legal fair housing obligations to provide equal treatment to minorities, families, and the disabled. All of the AIs recommend actions to support education and outreach activities to increase fair housing awareness and knowledge. The Moss Point and Pascagoula AIs recommend special workshops targeted to landlords, pertaining to Fair Housing Law and penalties for discrimination. Local level fair housing complaint review, as enabled by a state fair housing law, could also provide faster resolution of landlord discrimination complaints would provide an added incentive to discourage landlords from engaging in discriminatory rental practices.

Lack of Accessible Housing

The 1988 amendments to the Fair Housing Act dictate accessibility standards for privately owned housing, federally or publicly assisted housing, and to all types of housing when the housing is located in buildings containing four or more dwelling units as of 1991. The requirements do not apply to multi-story town homes that do not have elevators or to single-family detached houses. The Act requires multifamily units to have accessible routes into and through covered units, an accessible building entrance on an accessible route, accessible common areas, useable doors, accessible locations for lights, outlets and thermostats, reinforced walls and useable kitchens and bathrooms. Section 504 of the Rehabilitation Act of 1973 requires that for federally funded projects, 5% of the dwelling units meet accessibility standards for mobility disabilities and 2% of the dwelling units be accessible for hearing or visual disabilities. In 2004, the Gulf Coast Fair Housing Center conducted an accessibility audit of twenty multifamily housing complexes constructed after 1991 (when the 1988 amendment went into effect) to determine the level of compliance with the Fair Housing Act. The audit found that 75% of the complexes failed to meet one or more of the accessibility requirements. The audit also noted that the vast majority of multifamily apartment complexes on the Gulf Coast were constructed prior to 1991, and therefore almost certainly did not comply with Fair Housing Act accessibility standards.

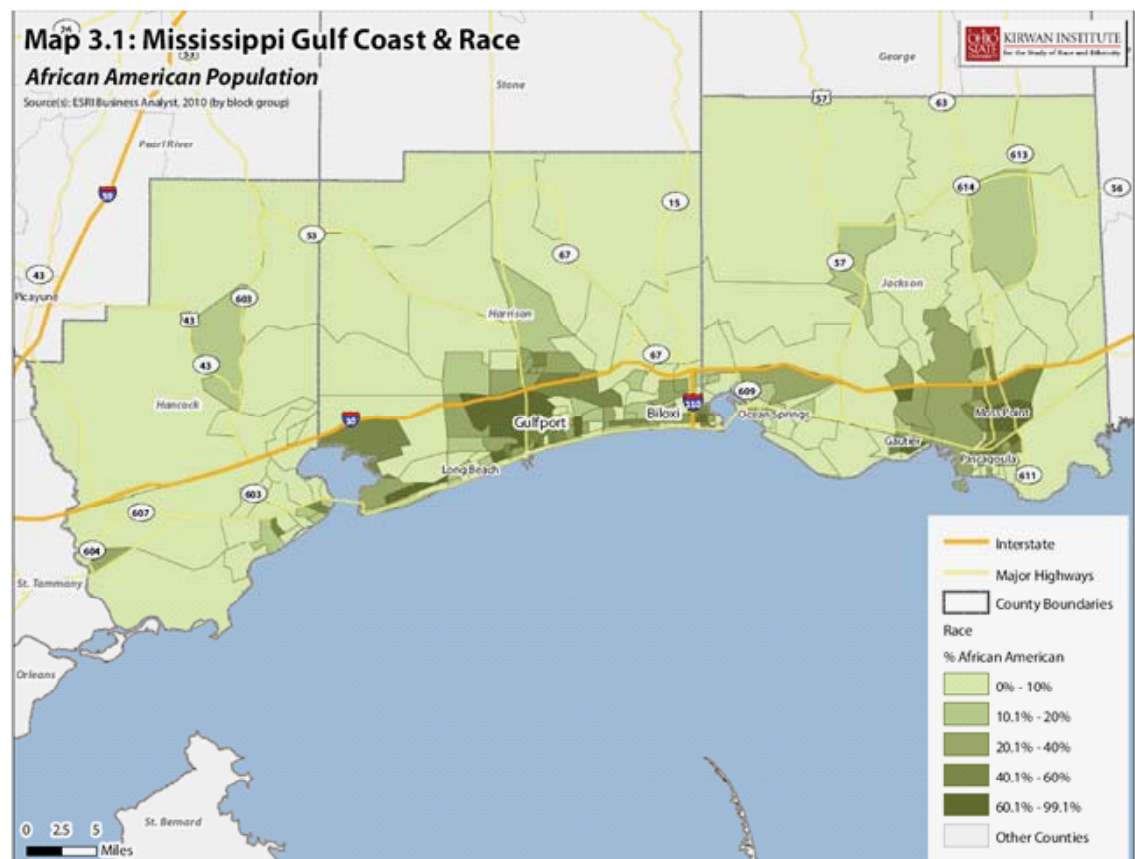
Hurricane Katrina destroyed many of these older complexes, and special tax credit provisions enabled the construction of a substantial amount of multifamily housing

since 2005. Therefore, it is likely that there is greater compliance with Fair Housing Act accessibility standards now than in 2004. Nevertheless, all four local AIs cited a lack of accessible housing as a prime impediment to fair housing, indicating the persistence of the problem. In addition, there are no accessibility requirements tied to multi-story town homes that do not have elevators or to single-family detached houses, further limiting housing choices afforded to persons with disabilities.

Increased Cost of Insurance

Insurance, specifically wind and flood premiums, increased dramatically following Hurricane Katrina. All four local AIs cite the increased cost of insurance as one of the largest barriers to redevelopment and access to affordable housing on the coast. The City of Pascagoula, which is located entirely south of I-10, called attention to the fact that insurance rates for properties south of I-10 increased significantly more than for those north of I-10. The AI does not identify a particular protected class to form the basis of this issue, and as the whole city is located south of I-10 it does not appear that the policy would have a disparate impact on any one group. However, when examined from a regional perspective, higher wind insurance rates south of I-10 do have a disparate impact on African American communities, the majority of which are located south of the interstate. Thus, wind insurance zones could arguably be considered an impediment to fair housing choice for the Mississippi Gulf Coast region.

Figure 6.2: Concentration of African American Population



Source: Kirwan Institute. (2011). Ohio State University.

The City of Moss Point noted in its AI that many private insurance companies no longer write insurance policies in the area. This is a known issue, and is the reason that insurance is also offered through the Fair Access to Insurance Requirements (FAIR) public entities such as the Mississippi Wind Underwriting Association. Aside from resolving to continue to support state and federal efforts to address barriers to redevelop on the coast, none of the AIs made any specific recommendations to address high insurance rates locally. However, there are opportunities for local jurisdictions to reduce the insurance burden for their residents. The City of Moss Point and Hancock County do not currently participate in the Community Rating System, discussed in detail above. By joining and becoming rated through the CRS, these jurisdictions could earn property owners a reduction in flood insurance premiums as high as 45%.

Recently, Southern Mississippi Planning and Development District and Mississippi Department of Marine Resources completed a project aimed at increasing participation in the CRS and providing education and outreach to floodplain managers, public officials, and the general public. The project team looked at what was being done by the local jurisdictions in regards to floodplain management and hazard preparedness in order to determine what else the jurisdictions could do to qualify for CRS credits. Much of the work was done in collaboration with the Coastal Hazard Outreach Strategy Team (C-HOST). As a result of the project Jackson County joined the CRS and Biloxi, D’iberville, Gautier, Long Beach, Pascagoula, Gulfport, and Ocean Springs all improved their CRS ratings.

6.4 Zoning Analysis

Zoning is a land-use planning tool that has been utilized by local governments and constitutionally upheld in the United States since 1926. Zoning ordinances most typically regulate development through land use classifications and dimensional standards, but since the 1980s more municipalities have started using form-based codes that allow for greater flexibility and mixed uses. While zoning is intended to protect and promote the health, safety, and general welfare of the public in accordance with a municipality’s comprehensive plan, the regulations can have the side effect of reducing the affordability and accessibility of housing in that jurisdiction. This is often an unintentional side effect, though in some cases it is an intentional, formalized expression of NIMBY attitudes (“Not in my back yard”).

Zoning regulations that limit a protected population’s access to affordable, quality housing is considered exclusionary. The protected populations or classes under the Fair Housing Act include race/color, national origin, religion, sex, familial status and disability. HUD recommends reviewing zoning regulations and other development-related ordinances for potential barriers to affordable housing as part of any fair housing study. The most common zoning regulations that affect the affordability or access to housing include the following:

- Design guidelines that increase building costs
- Costly application requirements for special permits or variances
- Restrictive definitions of “family” and “group home”
- Minimum lot size requirements
- Minimum floor area requirements
- Restrictions or limitations on the development or placement of multi-family or manufactured housing.

Local zoning codes were reviewed for the fore-mentioned regulations. While many of these regulations directly affect access to affordable housing, they are not necessarily an impediment to fair housing choice as defined by HUD or in violation of the Fair Housing Act (FHAA) because low income households are not a protected class. However, if a regulation has a disparate impact or disproportionate affect on a population of a certain race, color, religion, sex, ability, family status, or national origin the regulation may be deemed a violation of the Fair Housing Act. This assessment looks at both the potential of local zoning codes to impede access to affordable housing and to have a disparate impact on protected classes.

Design Guidelines

Zoning codes or supplemental ordinances sometimes mandate exterior finishes, such as brick, that can drive up the cost of construction. Increased building costs are likely to be passed on to the homebuyer or renter. It is important to note, however, that some less expensive finishes, such as vinyl siding, are not recommended for use in coastal areas because they are less durable in strong winds and less effective at resisting weather and sunlight over extended periods of time. After a review of local ordinances and interviews with planning and building officials, there do not appear to be any excessive design guidelines that would prevent access to affordable or fair housing choice.

Special Permit and Variance Requirements

When a certain use is not permitted in a zone by right, the property owner will sometimes have the opportunity to apply for a conditional use permit or variance. The application and review process for special permits and variances can be subjective, costly, and time consuming, and therefore not a viable option for households that are already faced with housing cost burdens. Variances and conditional use permits on the coast range from \$75 to \$200. These fees go directly to supporting the jurisdiction’s administrative cost for handling the permits and to pay for advertising for public notice as required by law. The prices for variances and conditional use permits on the coast are pretty standard and would not likely constitute a barrier to affordable or fair housing choice.

In addition, Mississippi State law requires that jurisdictions take no more than 60 days to process a variance or conditional use permit and most jurisdictions on the coast seem to operate well within this mandated timeframe. While there has been

some indication from discussions with local planners that the decision-making bodies are not always amenable to the idea of rezoning to accommodate multifamily development, there is little evidence available to suggest that the decision-making process in any of the local jurisdictions would constitute a barrier to fair housing.

Definitions of “Family”

The definition of a family, if narrowly defined to exclude unrelated persons, can be a major barrier to affordable housing. College students, for example, often live together in single family homes to share household duties and reduce housing costs. Jurisdictions on the coast have varying definitions of family, some of which are very limiting. Bay St. Louis and Waveland have the most open definitions of family: “One or more persons occupying a dwelling and living as a single housekeeping unit.” This definition would not serve as a barrier to affordable or fair housing. Long Beach limits the number of unrelated individuals living together to 3, Gautier limits the number to 4, and Biloxi, D’Iberville, Gulfport, Moss Point, and Pascagoula all limit the number to 5. These definitions can serve as a barrier to affordable and fair housing. One jurisdiction, in particular, limits the definition of family to one or more persons related by blood or marriage, including adopted children, occupying premises and living as a single housekeeping unit. This is a very limiting definition and most certainly is a barrier to affordable housing and fair housing choice as defined by HUD. It is important to note, however, that this very narrow definition has been overlooked in the zoning ordinance for quite some time and has not been enforced. The jurisdiction is currently working on revisions to the zoning ordinance.

“Group Home” Definitions and Requirements

With the enactment of the Fair Housing Amendments Act (FHAA) in 1988, an extension of the Fair Housing Act, Congress recognized the rights of persons with disabilities in matters of fair housing. The Act protects people with “handicaps” broadly defined to include individuals whose physical or mental impairments substantially limit one or more of their major life activities.

Congress made clear that one of the objectives of the FHAA was to prohibit the use of zoning and development regulations to directly or indirectly limit access to housing for persons with disabilities:

The Committee intends that the prohibition against discrimination against those with handicaps apply to zoning decisions and practices. The Act is intended to prohibit the application of special requirements through land-use regulations, restrictive covenants or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice in the community.

Discrimination through zoning regulation can come in several different forms. Most commonly, a jurisdiction will narrowly define “group home” in their zoning code

and limit the zones in which group homes are allowed by right. Other common regulatory barriers are dispersal requirements stating that a group home may not be located within a certain distance of another group home. Jurisdictions have also been known to require lengthy or costly variance or special permitting processes for group homes.

Unfortunately, some of these practices are still being implemented by jurisdictions along the Mississippi Coast. In several of the jurisdictions households of a certain number of unrelated senior citizens or persons with disabilities are included in a “Group Living” use category. This category often specifically includes assisted living facilities, convents and monasteries, dormitories, fraternity and sorority houses, group homes and rooming and boarding houses. Depending on the specific use, these types of living arrangements are prohibited in most residential base districts, allowed as a conditional use in some, and permitted by right in even fewer zones. In another jurisdiction, a dwelling shared by four or more handicapped persons is considered a group home. However, the definition clearly states that ‘handicapped’ shall not include any person currently involved in any program of recovery from the use of or addiction to alcohol or a controlled substance. This definition is in violation of the FHAA.

Two of the jurisdictions also have dispersal requirements, specifying that any group home shall be located at least 2,600 feet (approximately one-half mile) from any other group home. Similar dispersal requirements have been found to be in violation of the FHAA in a number of other states. Again, it is important to note that none of the jurisdictions were aware of these potential violations for Fair Housing Law and all are currently working to bring their codes into compliance and make them more equitable overall.

Minimum Lot Size

Minimum lot sizes have been adopted by all jurisdictions across the coast and, when coupled with maximum coverage requirements, can be used to regulate the density of development in a given area. Depending on the minimum lot size requirement and the value of land in the area, this requirement may or may not indirectly set the cost of land at a price that is out of reach for low to moderate income people. Minimum lot size requirements vary along the coast. In single family zones, minimum lot size requirements range from 5,000 square feet to 43,560 square feet (1 acre) for a lot in the Residential Estate zones. While some of these larger-lot zones may be hard for some residents to afford, they make up a relatively small part of each jurisdiction, tend to be further from employment centers and services and are unlikely to be considered a barrier to fair or affordable housing in the region. For multifamily units most municipalities on the coast require a minimum lot size for the first one or two units and then an additional square footage for each additional unit. This leads to the phenomenon where a jurisdiction can have the largest initial requirement and therefore seem to have the biggest barrier to affordable housing, when, in reality, adding more units reduces the lot size requirement below that of other jurisdictions that have a

smaller initial requirement. Ocean Springs and Moss Point, for example, have the largest initial minimum lot requirement for a multifamily development requiring a minimum of 8,000 square feet per unit for the first two units. However, as shown in Figure 1, Waveland's minimum lot requirement of 7,500 square feet per unit surpasses all other jurisdictions' requirements after three units. Table 6.1 at how the minimum lot area requirements play out as more units are added to the development plan. When broken down in this manner, most jurisdictions' requirements seem fairly reasonable and relatively comparable to one another. Waveland is the exception and may want to reconsider their current lot area requirements.

Table 6.1: Minimum Lot Area Requirements per Unit for Multi-Family Development

Jurisdiction	2 Units (sq. ft./unit)	3 Units	4 Units	5 Units	6 Units	7 Units	8 Units	9 Units	10 Units
Bay St. Louis	4,750	3,833	3,375	3,100	2,917	2,786	2,688	2,611	2,550
Biloxi	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
D'Iberville	6,000	2,500	2,250	2,100	2,000	1,929	1,875	1,833	1,800
Gautier	4,800	3,867	3,400	3,120	2,933	2,800	2,700	2,622	2,560
Gulfport	4,000	3,667	3,125	2,800	2,583	2,429	2,313	2,222	2,150
Long Beach	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000
Moss Point	8,000	6,000	5,000	4,400	4,000	3,714	3,500	3,333	3,200
Ocean Springs	8,000	4,167	3,750	3,400	3,167	3,000	2,875	2,778	2,700
Pascagoula	4,000	3,500	3,250	3,100	3,000	2,929	2,875	2,833	2,800
Waveland	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500	7,500

Source: Jurisdictions' Comprehensive Plans. Analysis by GCCDS.

Minimum Floor Area

Minimum floor area requirements are much less common, but sometimes more directly exclusionary. As shown Table 6.2 shows, only Diamondhead, Gautier, Moss Point, Pass Christian and Pascagoula have minimum floor area requirements for single-family homes. In Diamondhead, the majority of the residential areas are developed and the minimum floor area requirements mirror the covenants of the original planned community. Most of the jurisdictions that have minimum floor area requirements have incorporated them to protect the character of the existing neighborhood.

While it is not clear whether minimum square footage requirements would constitute a barrier to fair housing choice, they may be a barrier to affordable housing especially in some key locations close in proximity to employment centers and public transit. To give some perspective, in many areas of the country a 3 bedroom Habitat for Humanity home is no more than 1,050 square feet of living space. It is important to note, however, that most Habitat for Humanities in Mississippi do not build homes this small and have reported having little to no problem with jurisdictions

minimum floor area requirements. While minimum floor area requirements may not pose a significant problem on the coast at the present time, they may in the future. As factors in the economy and the demographics of the population on the coast continue to change, jurisdictions may want to look to other ways to protect neighborhood character and promote good design while leaving as many housing options open to residents as possible.

Table 6.2: Minimum Floor Area Requirements for Single-Family Homes

Jurisdiction	Zone	Minimum Floor Area (sq. feet/unit)
Bay St. Louis	All Residential	750
Diamondhead	MH and R Zones	640 – 2,000*
Gautier	R-1	1,335
Gautier	R-1A	1,100
Moss Point	R-1A	1,500
Moss Point	R-1B	1,200
Moss Point	R-1C	1,000
Moss Point	R-2 Single Unit	1,000
Moss Point	R-2 Two-Family	850
Moss Point	R-3 Single Unit	850
Moss Point	R-3 Two-Family	850
Moss Point	R-3 Multi-Unit	850
Pascagoula	SFR-10	1,500
Pascagoula	SFR-8	1,200
Pascagoula	SFR-6	1,000
Pascagoula	MR-3 Single Unit	800
Pascagoula	MR-3 Multi-Unit	500
Pass Christian	All	1000

Source: Jurisdictions' Comprehensive Plans.

* Diamondhead has a separate map of "Minimum Square Footage Requirements" that mirror the Property Owners Association Covenants, but do not correspond directly with a specific zone in the Zoning Ordinance.

Housing Types and Access to Fair Housing

An assessment of the 2010 American Community Survey five-year estimates shows that several racial/ethnic minorities are far more likely to occupy duplexes, multifamily housing, and mobile homes than the population overall (See Table 6.3). For example, American Indian households are far more likely than the population overall to occupy duplexes. Of all American Indian households on the Mississippi Gulf Coast, 10.2% live in two-unit structures, while only 1.5% of the general population lives in duplexes. Of all African American and Hispanic households and households of some other races on the Mississippi Gulf Coast, 22.4%, 30.6%, and 33.9%, respectively, occupy housing that has more than two units in the structure. This is much higher than the 12.4% of the overall population on the Mississippi Gulf Coast that lives in multifamily housing.

Table 6.3: Housing Type by Race

	Total	Caucasian	Black/ African American	Asian	Hispanic	Amer. Indian	Native Hawaiian	Other Race	Multi- racial
1 unit	72.4%	74.3%	68.6%	81.6%	48.0%	73.2%	83.8%	39.4%	68.5%
1, detached	70.5%	73.0%	65.2%	75.8%	44.6%	73.2%	83.8%	39.4%	61.4%
1, attached	1.9%	1.3%	3.4%	5.7%	3.4%	0.0%	0.0%	0.0%	7.1%
2 or more	12.4%	9.0%	22.4%	17.2%	30.6%	13.4%	16.2%	33.9%	11.7%
2 units	1.5%	1.0%	3.4%	0.0%	3.4%	10.2%	0.0%	1.1%	2.3%
3 or more	10.9%	8.0%	19.0%	17.2%	27.2%	3.2%	16.2%	32.8%	9.4%
3 or 4	2.7%	1.6%	7.1%	3.8%	3.7%	2.3%	0.0%	0.0%	0.4%
5 to 9	4.0%	2.7%	6.8%	4.0%	18.1%	0.0%	0.0%	22.6%	5.0%
10 to 19	1.9%	1.7%	2.2%	7.0%	2.1%	0.9%	0.0%	5.6%	1.5%
20 to 49	0.8%	0.7%	1.3%	0.0%	1.3%	0.0%	0.0%	0.0%	1.5%
50 or more	1.4%	1.3%	1.7%	2.4%	2.0%	0.0%	16.2%	4.7%	1.0%
Mobile Home	13.9%	15.2%	8.3%	1.2%	21.0%	13.4%	0.0%	25.0%	19.8%
Other	1.3%	1.6%	0.5%	0.0%	0.4%	0.0%	0.0%	1.7%	0.0%

Source: 2010 ACS 5-Year Estimates. Table B25032. Units in Structure by Race. Gulfport-Biloxi-Pascagoula CSA

Similarly, Hispanic households and households of some other races are far more likely to occupy mobile homes than the population overall. Of all Hispanic households and households of some other race on the Mississippi Gulf Coast, 21.0% and 25.0%, respectively, occupy mobile homes. This is significantly higher than the 13.9% of the overall population on the Mississippi Gulf Coast that lives in multifamily housing. It should be noted that the ACS definition of mobile home differs from the HUD and jurisdictional definitions of mobile home, which are limited to pre-1974 structures. The ACS definition of mobile home does not distinguish between mobile homes and manufactured homes. These findings suggest that any zoning policies unduly restricting the development or placement of duplexes, multifamily housing, or mobile/manufactured homes could constitute exclusionary zoning which is an illegal practice under the FHAA. See Figures 6.5, 6.6, and 6.8 for zones where duplexes, multifamily housing and manufactured homes are allowed by right.

ACS 1-Year estimates for family status show differences in the type of housing occupied by different types of households (See Table 6.4). Families, including single-parent families, are far more likely to occupy single family homes than non-family households. Therefore, it is unlikely that any zoning policies restricting housing types adversely impact families, including single-parent families unless zoning unduly restricts the placement of single family homes.

Table 6.4: House Type by Family Status

	TOTAL	Non-Family	Family		
			Total	Married	Single-Parent
1 unit	72.6%	59.2%	78.9%	80.8%	74.1%
2 or more units	13.3%	23.8%	8.5%	6.1%	14.5%
Mobile Home	14.0%	17.0%	12.6%	13.2%	11.3%

Source: 2010 ACS 1-Year Estimates. Table B11011. Household Type by Units in Structure. Gulfport-Biloxi-Pascagoula CSA.

Unfortunately, there is limited available data to describe the other characteristics of occupants of different types of housing. The American Community Survey does not provide estimates of the types of housing occupied by people of different national origins, religions, national origins, sexes, or abilities.

In sum, duplexes, multifamily housing, and mobile/manufactured homes are all housing types that protected classes rely on for housing choice. We next examine whether these types of housing are reasonably easy to develop or locate within local zoning ordinances.

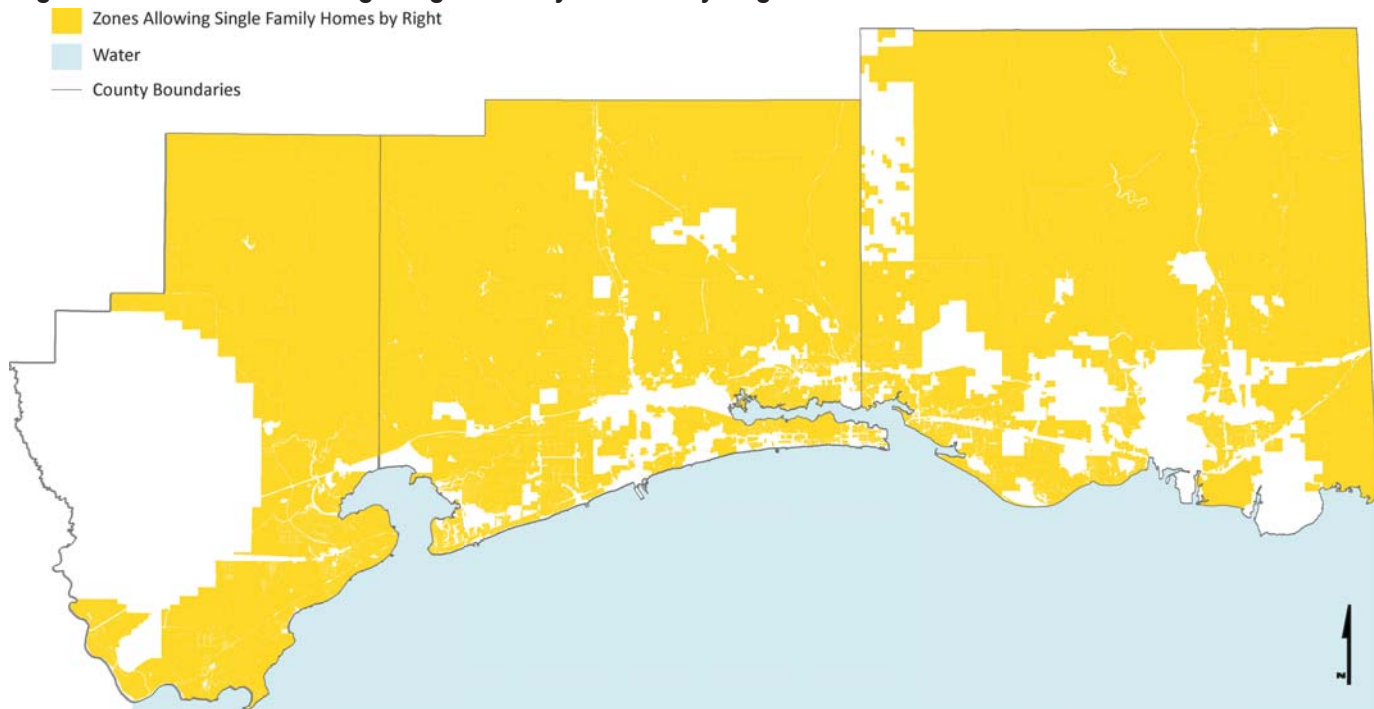
Duplexes and Multifamily

Typically, duplexes are two-unit structures resembling a house. Multifamily housing consists of all residential structures with more than two attached units. Multifamily housing can therefore take the form of an apartment building or multiple attached townhouses. Jurisdictions on the Mississippi Gulf Coast have varying definitions and differentiations between duplexes, apartments, townhomes and multifamily housing. For the purposes of this assessment, any zones allowing duplexes or 2-unit apartments were considered equivalent and any zones allowing multifamily housing, townhouses, or 3 or more unit apartments were considered equivalent.

While single family housing is typically allowed by right in all residential zones and even some commercial zones, duplexes and multifamily housing are typically restricted to a smaller portion of residential zones and/or commercial zones. In some communities, such as D'Iberville, they are not allowed in any zones by right. Rather, developers must apply for conditional use permits and subject the development proposal to public comment and the planning commission's opinion. Jurisdictions that unduly restrict the development of duplexes or multifamily housing may be in violation of the FHAA by decreasing the housing options available to the protected classes identified above.

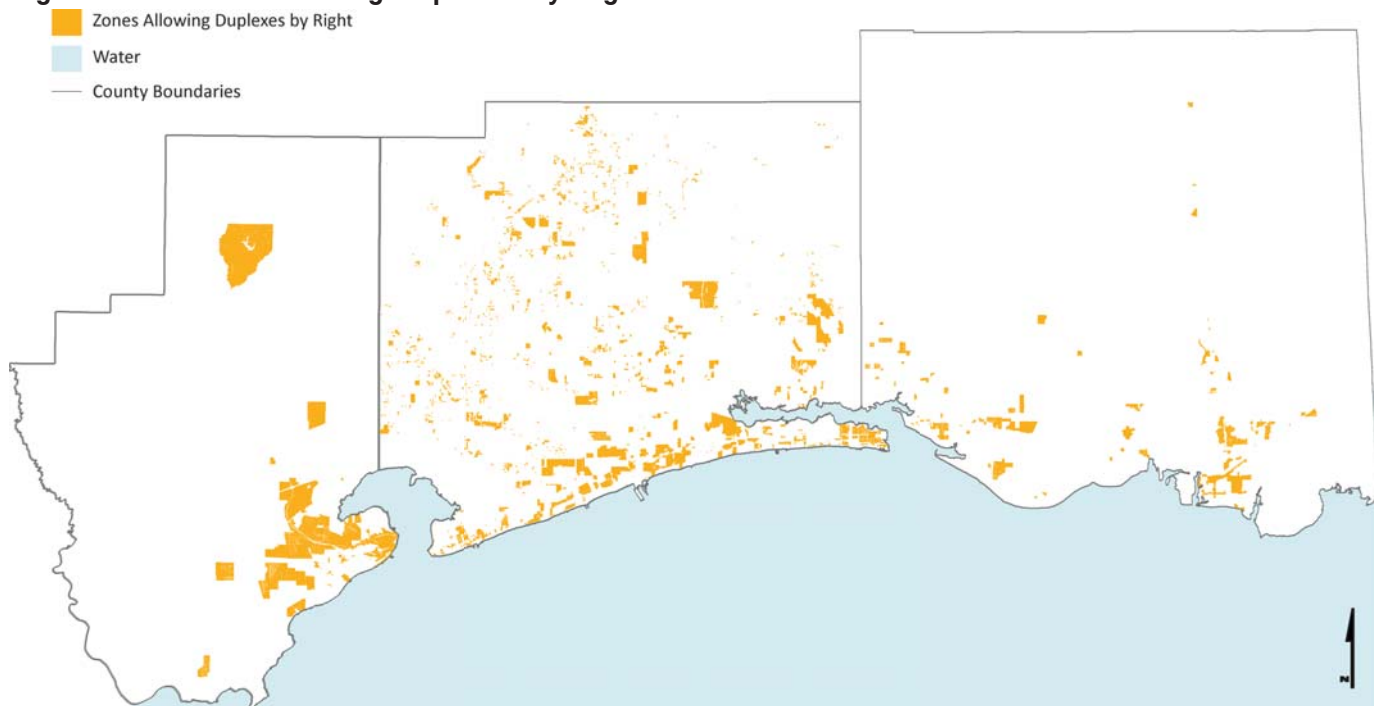
Many jurisdictions on the coast distinguish between apartment-style housing and townhomes, though both are a form of multifamily housing. In other words, while a jurisdiction may prohibit the development of apartments by right, it may allow multifamily townhomes. These more form-based codes actually tend to be more accommodating to duplexes and multifamily housing so long as the design calls for multiple attached units.

Figure 6.4: Zones Allowing Single Family Homes by Right

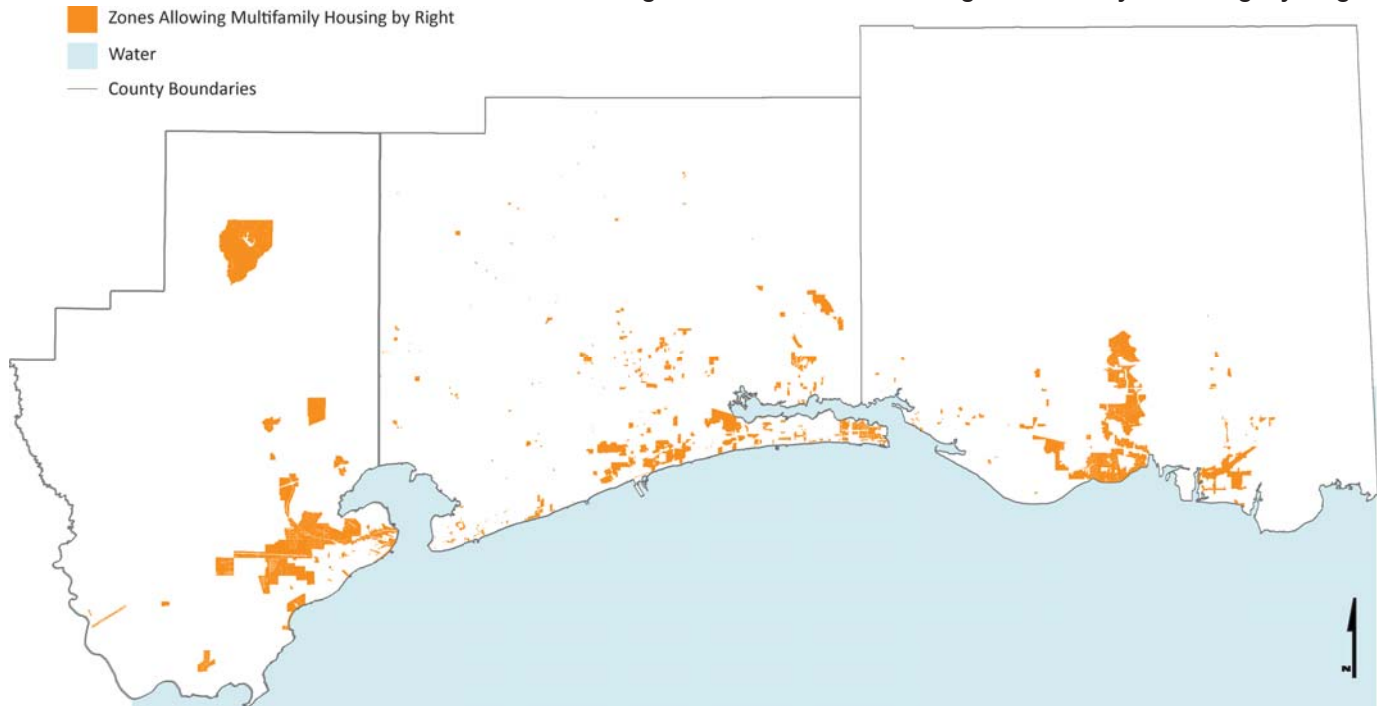


Source: GRPC. Maps by GCCDS.

Figure 6.5: Zones Allowing Duplexes by Right



Source: GRPC. Maps by GCCDS.

Figure 6.6: Zones allowing Multifamily Housing by Right

Source: GRPC. Maps by GCCDS.

Accessory Dwelling Units

Accessory dwelling units (ADUs), also known as accessory apartments, ancillary dwelling units, second units, in-law units, and granny flats, are additional, independent living spaces on single family dwelling lots that have many benefits tied to affordable housing. ADUs increase the affordable housing supply because they do not require the purchase of a separate parcel of land, and therefore cost less than the price of a single family home. ADUs have additional benefits, such as enabling elderly people to live close to family or caregivers without having to share a living space. ADUs can also benefit the homeowner by providing an extra source of income. While there is a growing awareness of the benefits of accessory dwelling units, many jurisdictions on the coast still have zoning codes that restrict their development.

Pascagoula and Pass Christian are the most progressive on the coast in terms of ADUs in that they allow them by right in many of their residential zones and do not restrict these units from being rented. Other jurisdictions such as Moss Point, ADUs are allowed by right in many zones, but are not allowed to be rented. In Biloxi, ADUs are allowed by right in most zones so long as the lot is 20,000 sq. ft. or larger, but they are not allowed to be used for permanent living or to be rented except in the Residential Multifamily (RM) zones. Bay St. Louis and Hancock County allow ADUs in most zones as rental units upon planning commission approval.

Several jurisdictions including Bay St. Louis, Biloxi, Gautier, Moss Point and Waveland allow for accessory dwelling units, but set a maximum number of bedrooms and/or floor area for the unit. While these size restrictions are not likely an impediment to

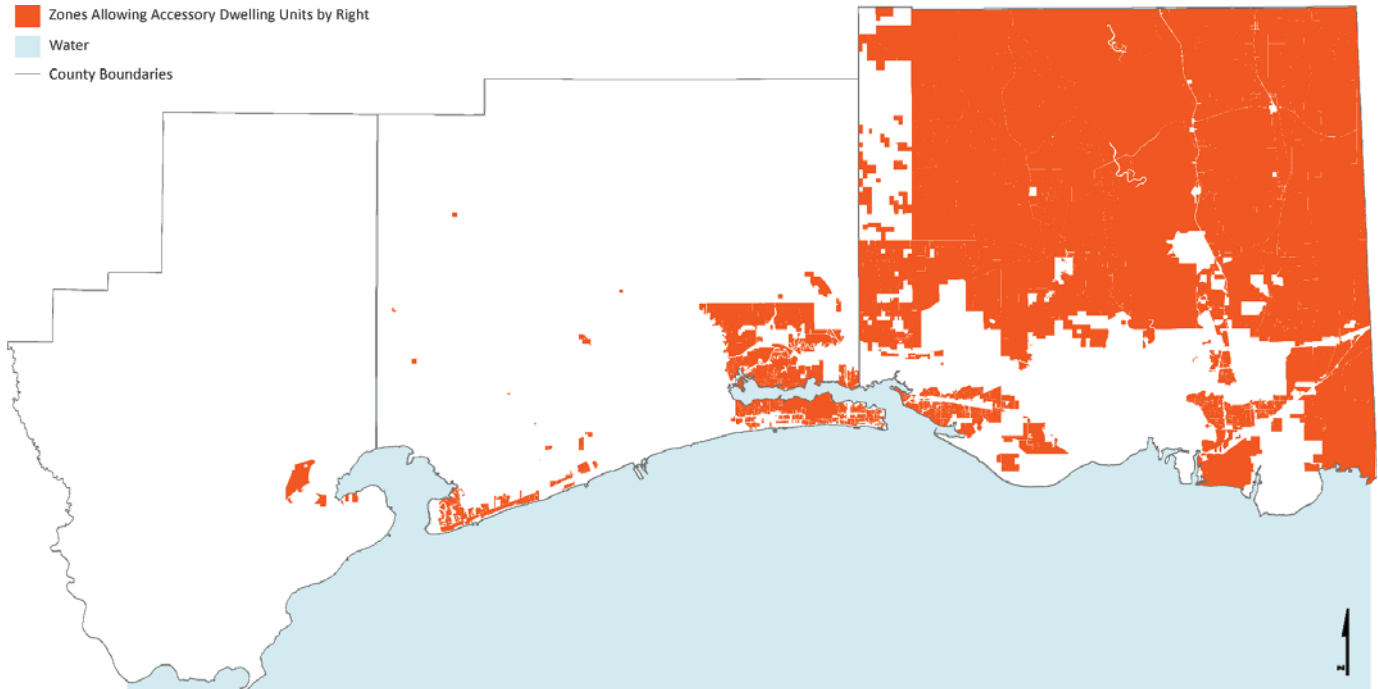
affordable or fair housing, restrictions on placement or ability to rent ADUs could serve to limit their availability. Again, it is important to note that in many of these zones they are still not allowed to be rented or even used for permanent living.

Manufactured Homes

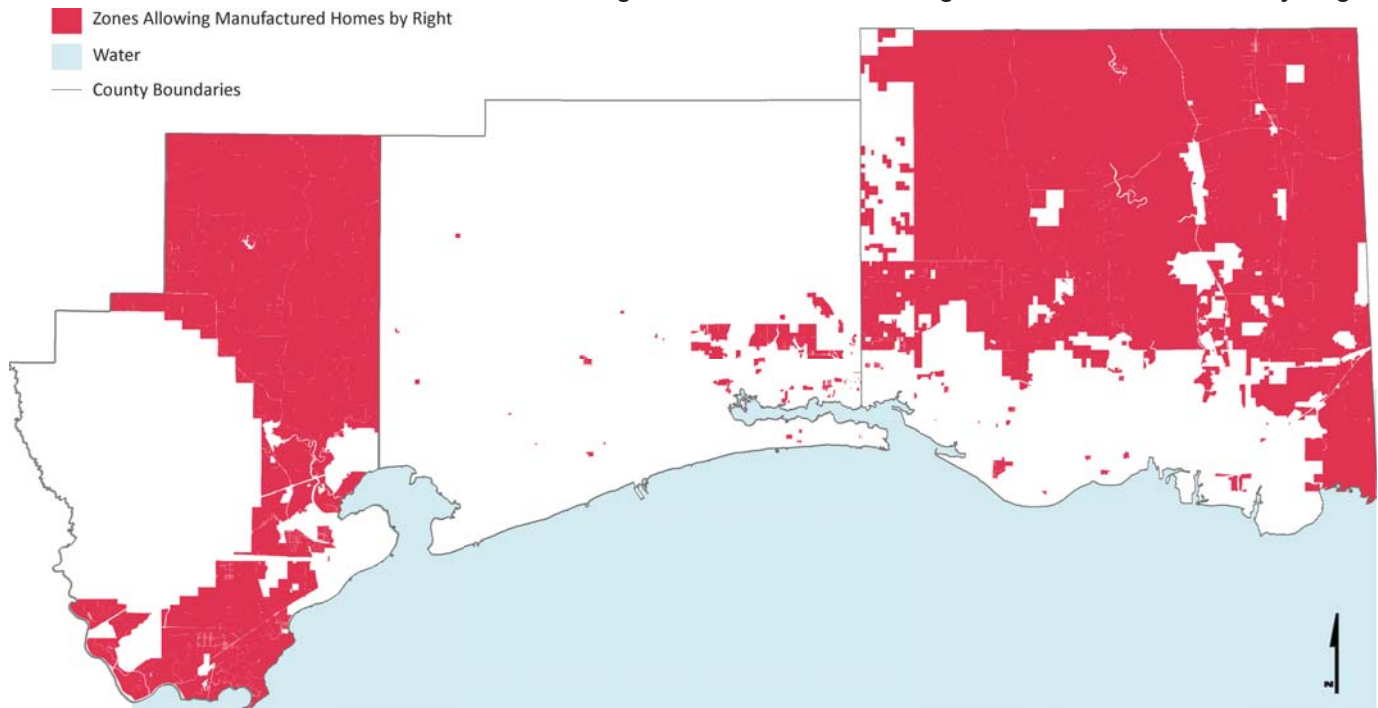
When properly executed, manufactured housing has been found to be a good affordable housing option for low income families. Manufactured homes are dwelling units of at least 320 square feet in size with a permanent chassis to assure the initial and continued transportability of the home, though many jurisdictions have a more specific definition in their local zoning code. Manufactured homes often carry a stigma and are confined to mobile home parks or sometimes banned altogether. This is true for jurisdictions on the Mississippi Gulf Coast in varying degrees.

In banning or restricting the placement of manufactured housing, many jurisdictions cite public safety as the primary concern. The resiliency of manufactured housing to windstorms varies and is a valid problem in this hurricane-prone region. HUD began to regulate the construction of manufactured homes in 1976 pursuant to the provisions of the National Manufactured Housing Construction and Safety Standards Act of 1974. In 1994, HUD amended the Manufactured Housing Construction and Safety Standards to provide for greater protection for manufactured homes from wind damage. Manufactured homes constructed after 1994 are rated to handle windstorm conditions, and may even be more resilient to wind damage than some site-built homes. The method of installation used to secure a manufactured home to its foundation is another major factor in performance during storm events.

Many jurisdictions on the Mississippi Gulf Coast restrict manufactured housing to mobile home parks, particularly in the incorporated areas. While other jurisdictions do allow manufactured housing by right in some zones, the zones tend to be extremely restricted. Bay St. Louis, Ocean Springs, Pascagoula and Waveland all limit the placement of manufactured and mobile homes to a specific district or only within mobile home parks and Long Beach, Pass Christian, and Bay St. Louis do not allow manufactured housing in any zone by right. Hancock and Jackson Counties allow manufactured housing in most of the rural residential areas, whereas Harrison County restricts manufactured housing to only one zone by right. Other jurisdictions do not limit the placement of manufactured housing, but set minimum dimensions for housing in all zones that, in effect, prohibits the placement of single-wide or double-wide manufactured homes in any zone. See Figure 6.8 for zones where manufactured homes are allowed by right.

Figure 6.7: Zones Allowing Accessory Dwelling Units by Right

Source: GRPC. Maps by GCCDS.

Figure 6.8: Zones Allowing Manufactured Homes by Right

Source: GRPC. Maps by GCCDS.

Modular Housing

Modular homes differ from manufactured homes in that they are constructed to the same standards and building codes as site-built homes and are not attached to a chassis. However, because modular homes are prefabricated and designed to be transportable prior to installation, many jurisdictions do not distinguish between manufactured and modular housing. This leads to a common phenomenon where modular housing is restricted from zones that otherwise allow single family housing.

The MEMA or Mississippi Cottage was a type of modular home designed in response to Hurricane Katrina as part of the Mississippi Alternative Housing Program. MEMA intended the cottages to provide temporary-to-permanent housing for victims of the hurricane. As such, cottages were dual-certified as both manufactured and modular housing, and were built to withstand winds up to 150 mph. Models ranged from a 1-bedroom measuring 340 square feet to a 3-bedroom measuring 840 square feet.

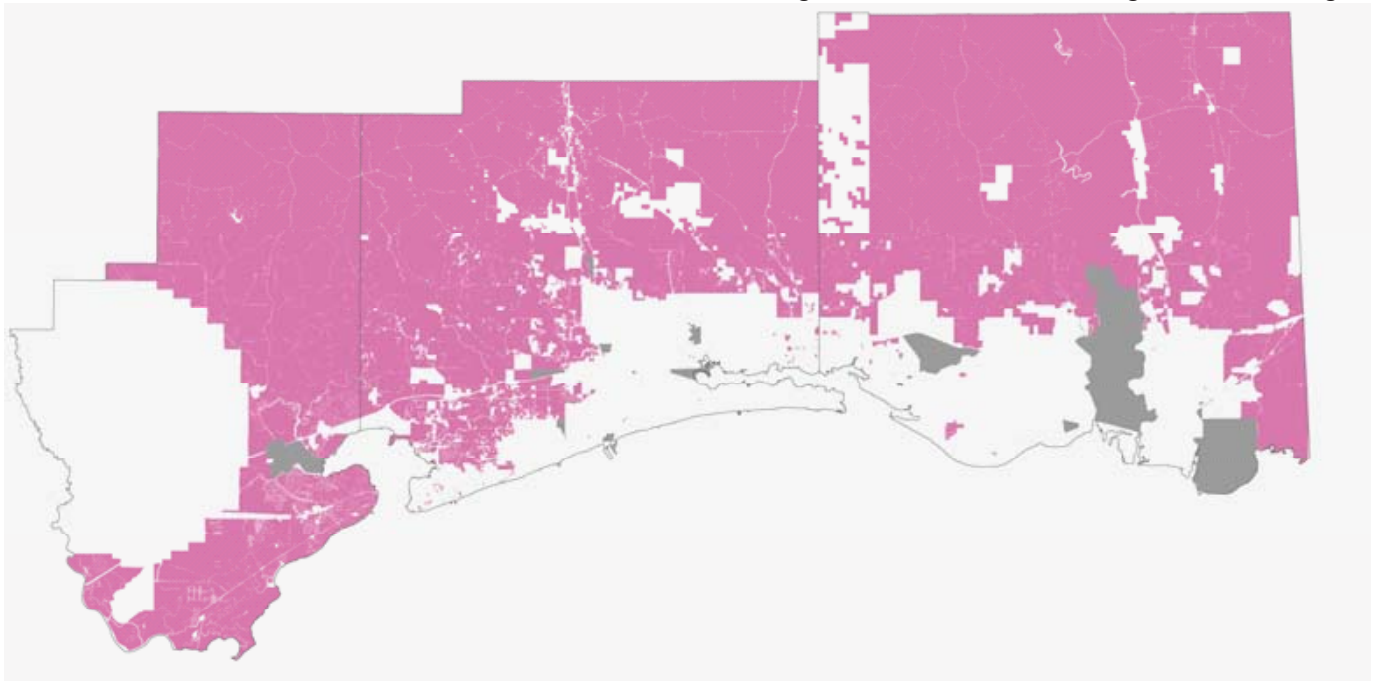
Initially, MEMA faced resistance to the cottages from most local governments in the three coastal counties. MEMA was finally able to convince all local jurisdictions to allow the cottages, often temporarily and with conditions attached. A series of cottage ordinances were enacted in 2009 that restricted their placement. These ordinances received a good deal of legal scrutiny and, since then, all cottage ordinances have been removed. To date, however, jurisdictions have still been able to ban or restrict the placement of cottages by defining them as a type of manufactured housing and by setting minimum square footage requirements as discussed above.

Of the 14 jurisdictions in the region, 4 have definitions of “modular home” that exclude at least some models of MEMA Cottages; some of which were approved post Hurricane Katrina. Long Beach specifies that a modular home must be over 32 feet in length and 8 feet in width. The smallest 1-bedroom MEMA cottage models would not qualify under this definition. Gautier and Jackson County define a modular home as having dimensions over 32 feet in length and 24 feet in width and, therefore, at least 768 square feet. By this definition both the 1 and 2-bedroom models would not qualify. Gulfport stipulates that a modular home “shall consist of two (2) or more components that can be separated when transported but designed to be joined into one integral unit.” MEMA cottages are designed in one part for ease of transportation and, therefore, considered a manufactured home within the City of Gulfport.

In Biloxi and Gautier, Mississippi Cottages are not allowed in any zones by right so each cottage placement has to be considered as a conditional use. Conditional use permits often require a lengthy application process and are subject to Planning Commission approval. This, however, does not mean that cottages were denied permits only that they had to go through a separate process of approval. In the City of Moss Point, residential zones that otherwise permit manufactured housing on a conditional basis have minimum floor areas that exclude all MEMA cottage models. See Figure 6.9 showing zones allowing MEMA cottages by right.

Zoning regulations that exclude or limit the placement of MEMA cottages are potentially a barrier to affordable housing. The finding that Hispanic households, households of other races, and disabled individuals rely on these forms of housing more than other demographic groups means that the restrictions on the location of manufactured housing and MEMA Cottages are further reducing economic and educational opportunities for these protected classes and may also constitute a barrier to fair housing. As Figure 6.9 illustrates, these housing types tend to be restricted to unincorporated areas further from the major employment and educational opportunities on the Coast. It is important to note, however, that an inventory of how many MEMA Cottages were permanently placed in the region and a study of the effects of zoning policies restricting the placement of MEMA Cottages has not been conducted to date and would be beneficial in shedding light on the subject.

Figure 6.9. Zones allowing MEMA Cottages



Source: GRPC. Maps by GCCDS.

Housing Type and Acreage

Table 6.5 is a quantitative comparison which shows the number of acres on the Mississippi Gulf Coast that allows the development or siting of each housing option by right. Note that these acreages do not indicate the amount of land available for development, but the amount of land in which certain uses are permitted. These figures undoubtedly include land that is constrained by existing structures, wetlands, floodplain designations, and other impediments.

Table 6.5: Acreage and Zones Allowing Housing Type by Right in the 3 Coastal Counties

	Single Family	Duplexes	Multifamily	Manufactured	ADU
Total Acreage	924,352	86,155	77,461	480,996	361,969
Acreage in Cities	157,492	58,316	61,046	10,266	39,805

Source: GRPC. Analysis by GCCDS.

As shown in the chart above, the amount of land on which duplexes or multifamily housing is allowed constitutes only 8-9% of the acreage allowing single family housing development. These development restrictions could hinder the production of more housing options on the Mississippi Gulf Coast. It is important to recognize, however, that there seems to be a cultural preference in the region toward single family living situations, thereby increasing the importance of addressing minimum square footage requirements to address issues of affordability.

The acreage allowing manufactured housing is more comparable to the acreage allowing single family housing; however, it is still only 52% of the land allotted for single family and the vast majority is restricted to the unincorporated areas that are further from employment and educational opportunities. Only 2% of the acreage allowing manufactured housing is within an incorporated community.

The acreage for Accessory Dwelling Units is only 39% of that allowing for single family homes. Again, the majority of this land is not within the incorporated areas and very few of the zoning policies allow for the units to be rented or even used as permanent living. Increasing the allowance of ADUs across the coast and more specifically in residential areas near employment center and services could dramatically improve access to affordable housing while honoring the widespread preference for living in a more single-family environment. By allowing more ADUs to be rented jurisdictions could also give homeowners access to an additional source of income that is arguably much needed in the wake of the economic recession and at a time when an increasing number of homeowners are facing foreclosure.

6.5 Regional Impediments

Since the passage of the Fair Housing Act in 1968, the federal government has challenged jurisdictions and organizations to “affirmatively further fair housing.” Congress, however, has never defined what it means to affirmatively further fair

housing so jurisdictions remained challenged to know how, exactly, to accomplish this goal unless they are responding to a specific litigation. The federal government and HUD are becoming increasingly aware that this ambiguity is not serving the intended goal and are also becoming more apt to withhold funding from jurisdictions and organizations they feel are not taking adequate steps to address fair housing issues in their communities and programming. Due to this shift, the jurisdictions on the coast would likely benefit from proactively responding to the findings of this fair housing analysis.

Based on the above analysis, the clearest regional impediments to fair housing and/or accessing affordable housing are:

- Lack of awareness and understanding of fair housing law and resources
- Limited capacity for regional fair housing review and enforcement due to lack of funding and no state-level fair housing legislation
- Prevalence of financially under-qualified residents due to poor credit history and high debt-to-income ratios
- Limited definitions of family and group homes in zoning ordinances
- Zoning policies that potentially and unduly restrict the placement of certain housing types that house a larger percentage of minority or low-income families
- Minimum square footage requirements that potentially limit more affordable housing options in certain areas

CHAPTER 7

MAJOR PUBLIC INVESTMENTS

Throughout the Mississippi Gulf Coast region there are a number of major public investment projects that are scheduled for development from transportation improvements to economic development. The full impact of these projects is yet to be determined. Once funding has been allocated and the decision to move forward with a given project, an environmental impact assessment (EIA) will likely be required. The EIA looks primarily at the positive and negative impacts of a proposed project on the environment, but also looks at the social and economic impacts. In addition, the Mississippi Gulf Coast region has several active advocacy organizations that work to ensure minority groups and vulnerable communities are represented as project alternatives are being considered. This section reviews major public investment projects that are planned or in progress and considers the potential for positive and negative impacts on communities and RCAPs, in particular.

7.1 Economic Development

Across the three coastal counties, federal dollars are being utilized to re-build or make improvements to the coastal marinas and harbors. The largest of these projects is the construction of the Bay St. Louis Harbor and Pier Project. The marina is planned to be located between Demontluzin Street and the CSX railroad bridge. The proposed municipal pier and boat slips are being promoted as an important economic driver for Old Town Bay St. Louis and Hancock County. The master plan for the new Marina also includes the development of other supplemental businesses such as restaurants, shops and businesses. There are not likely to be many, if any, negative impacts on residential communities and few people have publicly opposed the project. There have been some property rights questions, but mostly around vacant land with the potential for commercial development.

There are also several small improvements being made to the Old Biloxi/Ocean Springs fishing bridge in Harrison County, Harbor Landing in Jackson County, and the public pier and harbor in Pascagoula. These are recreational and public use facilities and will likely be a benefit to the immediate and larger communities.

The Mississippi State Port Authority (MSPA) at Gulfport has plans to expand and improve its facilities. The expansion has been promoted as a future economic driver for the region, although the extent to which it will create local jobs has been debated. The Port Restoration Program currently has more than \$57 million in construction

projects underway. Planned improvements include raising the height of the port, expanding inland facilities and adding a connector road that will make the port more accessible to the interstate and reduce the amount of truck traffic among major roads in the city of Gulfport. The overall project plan, however, is currently going through many changes and anticipated impacts are uncertain. Specifically, the permit for the port connector road is no longer valid and the Army Corps of Engineers is required to perform a new EIA for the port facilities, as well as connector road.

7.2 Transportation

The planned port connector road, part of the MSPA port expansion project, is still being evaluated and remains a point of contention. Final placement of the road has not been determined, but it will likely run through several neighborhoods including two RCAPs in west Gulfport. Residents are concerned about air pollution and truck traffic among other impacts and local advocacy groups are working to make sure their concerns are taken into account. Projects of this nature usually have both positive and negative impacts on communities and larger regions and further evaluation from all parties involved will likely reveal more information as to what these might be for this specific project. Careful consideration, however, should be given to vulnerable communities and the two RCAPs in west Gulfport as plans for the port connector road move forward.

Concurrently, improvements are being made to the Kansas City Southern Rail line as part of the MSPA port expansion. The rail line runs both east and west from the port and is bordered by both residential neighborhoods and commercial areas. The repairs will provide MSPA with a much improved transportation line to distribute goods and allow rail traffic along the coast to increase from the port. Specific improvements include installing 67,500 ties, replacing two bridges, upgrading several other bridges, and renewing crossings and turnouts. While these improvements themselves will not necessarily impact the residential neighborhoods over and above the construction noise, increased rail traffic resulting from the port expansion may be seen as unfavorable.

There are numerous other roadway capacity improvements planned in all three coastal counties. The majority of these will focus on improving the operational capacity of existing roads, often by improving travel flow at intersections. Many of these improvements will likely benefit the immediate commercial areas and are not likely to adversely impact nearby residential areas. Other major projects will include adding lanes on high-traffic arteries to improve traffic flow in commercial areas and along Interstate 10. Some of the areas discussed in the plans include: improvements to Popp's Ferry Road in Biloxi and D'Iberville; Pass Road in Biloxi; Sangani Blvd. in D'Iberville; Three Rivers Road, Seaway Road and 28th Street in Gulfport; Main Street in Bay St. Louis; US Hwy 90 and Washington Avenue in Ocean Springs; Martin Bluff Road in Gautier; Hospital Road in Pascagoula; Old Fort Bayou Road in Jackson County; Lorraine Rd./Biloxi River Bridge in Biloxi and Gulfport; and the proposed Hwy 43/603 realignment in Hancock County.

The provision of pedestrian and bicycle facilities has become more of a priority in the coastal communities during the last few years. Toward development of expanded options for travel, including more accessibility and connectivity for those who may need or choose other modes of travel than the automobile, infrastructure projects to provide pedestrian, bicycle and transit options and interconnectivity are being promoted and developed. New roadway design standards are being considered by some of the communities to require that future roadway projects are developed to consider and provide for maximum utility by all users, motorized and non-motorized.

The Coast Transit Authority (CTA) has a long-range plan that includes many region-wide public transit improvements. Several projects focus on the addition of bike and pedestrian amenities such as the addition of a pedestrian bridge that would link Jones Park across highway 90 to downtown Gulfport. Other investments include a new intermodal center for the city of Gulfport and a new transportation Center in D'Iberville. The plan also discusses expanding bus routes to provide more access to all areas of the three coastal counties including linking Pascagoula to Bay St. Louis and establishing new park-and-ride facilities for commuters. These public transportation investments, among others, could greatly improve resident mobility and physical wellness in the region.

7.3 GoCoast 2020

GoCoast 2020 is an advisory body created by the Executive Order of Governor Phil Bryant in August 2012 in regards to the allocation of RESTORE Act funding. The RESTORE Act is a federal act that will direct 80% of certain penalties determined through the investigation of the BP Deep Horizon oil spill to the five Gulf States that were impacted from the spill. The final report of the advisory committee was released in January 2013 and serves to set a framework for evaluating future projects to receive RESTORE Act funds in Mississippi. The study focuses on the following key areas:

- Tourism
- Infrastructure
- Restoration
- Seafood
- Small Businesses
- Workforce
- Economic Development
- Research and Education

The FHEA is a public document meant to inform recommendations in the *Plan for Opportunity* and for use by the jurisdictions, organizations and community groups

The report included recommendations, ideas and future funding criteria for each of the eight key areas in a format meant to be accessible for policymakers and citizens. The report provides a valuable comprehensive outline for future public improvements coast wide and includes many aspects of sustainability that overlap with the goals and objectives of the *Plan for Opportunity* specifically around economic development and the natural environment. It is important to note, however, that none of the criteria specifically address equity in the region; an important component of sustainability that should be taken into consideration when evaluating future projects.

CHAPTER 8

BRIDGING THE GAP

The FHEA is a public document meant to inform recommendations in the *Plan for Opportunity* and for use by the jurisdictions, organizations and community groups of the Mississippi Gulf Coast Region. It is meant, not only to provide a baseline for how the region is doing in terms of fair housing and equity, but to provoke thoughtful discussion and further research.

8.1 Methodology

The FHEA was undertaken in conjunction with the development of the *Plan for Opportunity*. The *Plan for Opportunity* is a collaborative planning project intended to guide the sustainable growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The three year planning process was guided by a group of stakeholder committees which have been organized and expanded over the course of the plan to include city and county leadership, key community and public partners, and residents of the region.

The Housing Subcommittee was charged with analyzing the current housing landscape on the Mississippi Gulf Coast; identifying housing and housing related issues; and developing recommendations to be incorporated into the final plan. The Housing Subcommittee of the Plan for Opportunity oversaw the development of the FHEA under the guidance of the Gulf Coast Community Design Studio and other Plan partners (See Appendix A).

Work on the FHEA began in April 2012 following HUD's webinar series on the FHEA/RAI component of the grant. The FHEA follows much of the format required by HUD's Fair Housing Planning Guide for a jurisdictional AI. Like an AI, the FHEA examines regional demographics and conditions of racial and ethnic segregation. It considers public sector activities affecting housing choice, such as zoning and land use regulation, and distribution of affordable housing resources. It also considers private sector policies and procedures such as lending practices and trends in home sales and rentals. Both the FHEA and AI account for recent or current allegations of systemic discrimination against private or public entities in the 15 jurisdictions in the Sustainable Communities grant area, and the capacity of the entities in the area to respond.

The initial analysis was completed and approved for public review by the governing committees of the *Plan for Opportunity* in April 2013. The Housing Subcommittee and other topical subcommittees immediately began using the findings of the FHEA to guide and even redirect their work where appropriate. The findings of the FHEA were integrated into the *Plan for Opportunity* and had a major influence on the recommendations coming out of the *Plan for Opportunity*. The key recommendations that are tied directly to the findings of the FHEA are included in Section 8.4. Many other recommendations in the *Plan for Opportunity* beyond those highlighted in this document will serve to advance the FHEA's goals of improving fair housing and access to opportunity in the region. In addition, there has been substantial public engagement around the findings of the FHEA as described in the following section. Public feedback on the findings of the FHEA has been worked back into this final version of the FHEA.

8.2 Public Engagement

Key Stakeholders

Many stakeholders from across the Mississippi Gulf Coast Region have been involved in the creation of this FHEA and their input has been invaluable. Representatives from housing and social service agencies, advocacy organizations and the various jurisdictions have been instrumental in collecting and analyzing the information used in this report. Many of these stakeholders have been engrained in the planning process from the beginning through the various *Plan for Opportunity* committees, while others were specifically sought out for the purpose of informing and/or reviewing the FHEA.

The Housing Subcommittee for the Plan for Opportunity was instrumental in developing the FHEA (See Appendix A). The subcommittee consists of representatives from housing and housing service organizations from across the Mississippi Gulf Coast. Under the guidance of the Gulf Coast Community Design Studio, these subcommittee members were responsible for making sure the voices of residents from across the coast, especially traditionally underserved populations, were represented in the work and supported with the final recommendations. In addition, the Working Group and Executive Committee for the *Plan for Opportunity* also reviewed the FHEA and gave feedback.

The overall response of these stakeholders is that the FHEA is a valuable piece of work that should be used not only in this regional planning effort, but also by planners and public officials in the region as a basis for discussing future collaboration and investment. In addition, all were interested in continuing to collect data in order to monitor trends and progress over time. While stakeholders were not necessarily surprised by the majority of the findings of the FHEA, many were surprised by the locations and limited number of designated RCAPs in the region given their experience working in various communities on the Mississippi Gulf Coast. The map showing the Predicted Racial and Ethnic Composition Ratio seemed to more closely

align with what they were seeing on the ground. In addition, the majority agreed that the hard data was not always adequate in telling the whole story and see the statistical analysis within the FHEA as a starting point for further inquiry.

Opportunity Mapping

The process of developing the opportunity indicators and maps used in the FHEA began in 2011 and involved many residents and community leaders from across the region (See Section 5). Gaining consensus around the opportunity indicators and maps has been a challenge over the last two years. The population on the Mississippi Gulf Coast is relatively small and is highly concentrated in the southern most portions of the counties. There are also large areas that are completely unpopulated such as the Stennis buffer zone and areas around the Pascagoula River. While the best available data was used to describe opportunity in the area, limitations in the data and in the ability of Census block groups to accurately describe the region made understanding the maps challenging for many people. Interestingly, those who were introduced to the opportunity mapping through the FHEA were more comfortable with the concept because they could see the tool used in a specific context and to a specific end. As such, the FHEA may become one of the most effective means of introducing potential users of the opportunity mapping to this powerful tool.

Despite its limitations, the opportunity maps remain one of the most important tools coming out of the *Plan for Opportunity*. Not only do the opportunity maps play a vital role within the FHEA, they will also continue to inform the *Plan for Opportunity* and serve as a planning tool for jurisdictions, organizations and community groups in the region.

General Public

In order to make the FHEA and findings of the FHEA more accessible to the general public and local leadership, the Gulf Coast Community Design Studio developed a factsheet to be used in various outreach efforts (See Appendix C). The FHEA and factsheet were presented along with the other topical work for the *Plan for Opportunity* at a series of seven Community Open Houses held in the fall of 2013. The open houses were staffed by representatives of the Plan's core member organizations and were located in communities including those traditionally underserved along the Gulf Coast. To reduce difficulty in engaging with the Plan, open houses occurred at varied times, days of the week and locations to ensure that attending the workshop did not get in the way of individuals' work or family schedules. Additionally, open houses provided documents translated in Spanish and Vietnamese, as well as on-site translators to remove any avoidable barriers to access. Many participants at these open houses who reviewed the FHEA and the other work of the Housing Subcommittee reported that it is important for jurisdictions in the region to review and revise their policies to comply with fair housing laws and saw a strong need for a permanent HUD and state recognized fair housing organization to support the needs of the region.

Focus Groups and Survey

As a first step to understanding the high level of segregation in Moss Point, the Gulf Coast Community Design Studio and Steps Coalition held a focus group of residents and community leaders in Moss Point on October 22, 2013. Seven residents of Moss Point attended the focus representing organizations including Jackson County Civic Action Agency, Nettles Foundation, and Trinity Outreach Corporation, Inc. Residents went over the findings of the FHEA, specifically in regards to the high levels of segregation in Moss Point, and were asked to share their reactions to the information and to discuss possible causes of and solutions to these trends.

In addition, the Gulf Coast Community Design Studio and Steps Coalition held a focus group of residents and community leaders in Pascagoula on October 30, 2013. Eight residents of Pascagoula attended the focus representing such organizations as the National Association for the Advancement of Colored People, Parents for Public Schools, and United Way for Jackson and George Counties. Residents went over the findings of the FHEA, specifically in regards to the RCAP in Pascagoula, and were asked to share their reactions to the information and to discuss causes and possible solutions.

The Economic and Workforce Development Subcommittee and Transportation and Land Use Subcommittee surveyed residents in RCAPs in Pascagoula and Northwest Gulfport, both of which were in areas of low and very low opportunity specifically in regards to socioeconomic opportunity. Residents were asked questions about barriers to employment and access to transportation. While the survey is not statistically valid, it provides insight into the problems, perceptions and opportunities that may be impacting workforce engagement.

8.3 Key Findings

This FHEA is the Mississippi Gulf Coast's first attempt at looking at fair housing and equity issues from a regional perspective. For many non-entitlement jurisdictions on the coast this was the first time these issues had ever been looked at systematically. As such, the FHEA provides a wealth of information both for individual jurisdictions and to inform the regional *Plan for Opportunity*. In terms of informing the Plan for Opportunity, the following "Key Findings" have been identified and taken into account as the topical subcommittees developed recommendations to be included in the final plan.

While much headway has been made in overcoming the contributors to segregation on the Mississippi Gulf Coast, emerging trends and the effects of any new programs, policies or investments need to continue to be aggressively monitored. In addition, it became clear that a more thorough study of the history of segregation and its lingering impacts would greatly benefit the region. In order for the region to overcome some of the persistent effects of segregation and discrimination it must first understand and acknowledge its history. In the meantime, more can and should be done to

proactively work towards increased integration across the coast and specifically in those parts of the region where higher segregation levels have been identified (See Section 3). Residents from a focus group in Moss Point, the jurisdiction with the highest level of segregation in the region, agreed that support from local leadership, recruitment of more businesses downtown, investment in education, enforcement of property maintenance codes, and investment in beautification efforts would greatly improve Moss Point and help counter the lingering effects of urban flight.

Section 5: The Geography of Opportunity in the Mississippi Gulf Coast Region, calls attention to some topical and geographic priority areas to focus future investment. For example, the Black/African American population and some of the more vulnerable populations including persons with disabilities and those living in RCAPs were all disproportionately living in areas of very low socioeconomic opportunity across the coast. Programmatic investment and policies aimed to improve socioeconomic opportunity throughout the region could greatly benefit these underserved populations. Residents who participated in a focus group in Pascagoula felt that investment in workforce development and K-12 education would greatly benefit the area. They also saw a strong need to support the growing Hispanic population and provide services to improve English proficiency. In addition, transportation and lack of child care options were cited as major barriers to employment in the area based on a survey conducted in April of 2013.

Much work needs to be done throughout the state to improve Mississippi's service system for persons with mental and physical disabilities. Key barriers remain to transitioning persons with disabilities from institutions to a more integrated setting within communities including lack of adequate housing and access to services. While the U.S. Department of Justice is still in the process of working with the State of Mississippi on a plan for reform, the Gulf Coast Region should be a leader in forwarding community inclusion for persons with disabilities.

Fair housing issues, in general, remain a challenge in the region and could become more so if no action is taken to create a permanent fair housing agency to serve the needs of residents on the coast. While HUD's Mississippi office can investigate fair housing complaints, it is not in a position to aggressively examine local practices or to provide needed outreach and education. This is a problem statewide and should ultimately be addressed through the state legislature.

In addition, potential fair housing violations in local zoning codes that have been identified through this work have been brought to the attention of affected jurisdictions. Actions are underway to correct those specific violations, but all the jurisdictions should resolve to review their zoning codes and make revisions to definitions and provisions that may limit access to fair housing. It is also recommended that these revisions bring the various jurisdictions' zoning codes more in line with one another to create more uniformity and transparency across the coast.

8.4 Recommendations and Next Steps

One of the major roles of the FHEA is to inform the recommendations included in the regional *Plan for Opportunity*. The findings of the FHEA were fully integrated into the process of developing recommendations for the Plan and were particularly relevant to the work of the Housing, Economic and Workforce Development, and Transportation and Land Use Subcommittees. Many of the recommendations coming out of the work of the Housing Subcommittee both directly and indirectly address issues and opportunities identified in the FHEA. As such, the full Regional Housing Recommendations report is included as an appendix in this FHEA (See Appendix E).

The Regional Housing Recommendations report starts out by identifying three core strategies for establishing a foundation for regional planning on the Mississippi Gulf Coast. One of these three core strategies is to continue to look at housing regionally through a Fair Housing and Equity Assessment or Regional Analysis of Impediments. The *Plan for Opportunity* and, specifically, the Fair Housing and Equity Assessment represents the first step in regional housing analysis and planning for the Mississippi Gulf Coast Region. While the FHEA provides valuable baseline data, it is important to continue to monitor and plan for housing needs on the coast from a regional perspective. A comprehensive housing inventory to describe the current housing stock by type would be a crucial part of this regional assessment. Not only will continued regional housing planning make the region more successful at addressing housing challenges on the coast, it will better position the region to leverage additional state and national funding. A regional Fair Housing and Equity Assessment or Regional Analysis of Impediments would ideally become a regular task of a regional housing coalition. In addition, more direct communication between HUD and the entitlement jurisdictions regarding the benefits and funding implications of participation in a RAI would help support the Mississippi Gulf Coast in future regional housing planning efforts.

Following these three core strategies, the housing recommendations are organized under five goals developed over the course of the three year grant period. One of the five goals is to improve compliance with Fair Housing Law and increase access to fair housing. This goal has three main objectives: 1) Improve regional capacity to affirmatively further fair housing; 2) Remove existing barriers to accessing fair housing; and 3) Address existing segregation and trends as identified in the *Plan for Opportunity's* FHEA. Eight strategies were identified to achieve these objectives:

1. Encourage jurisdictions to review the definition of “family” in their zoning code and amend zoning ordinances to include a more inclusive definition.

Definitions of “family” on the coast range from any group of individuals living together in a single housekeeping unit to only individuals related by blood or marriage. Some of these definitions can be limiting and even considered

a barrier to fair housing choice. As part of the *Plan for Opportunity*, the Gulf Coast Community Design Studio (GCCDS) met with any jurisdictions whose zoning ordinance contains provisions that are potential violations of fair housing law. All jurisdictions on the coast, however, are encouraged to review the definition of “family” in their zoning ordinance and consider revising the definition to be more inclusive. In addition, jurisdictions are encouraged to bring their definitions closer into alignment with one another to improve transparency for residents and the efficiency and effectiveness of future regional planning efforts.

2. Encourage jurisdictions to review their policies in regards to group homes, revise their zoning ordinance to comply with Fair Housing Law, and allow group homes in residential zones.

As part of the *Plan for Opportunity's* Fair Housing and Equity Assessment (FHEA), jurisdictions' definitions and policies around group homes were reviewed. Group homes are not allowed by right in most residential zones and several of the jurisdictions have definitions or dispersal requirements that could be considered a barrier to fair housing choice. As part of the *Plan for Opportunity*, the Gulf Coast Community Design Studio (GCCDS) met with any jurisdictions whose zoning ordinance contains provisions that are potential violations of fair housing law. All jurisdictions on the coast, however, are encouraged to review the definition of “group home” in their zoning ordinance and policies around group homes and consider making revisions to be more inclusive. Again, jurisdictions are encouraged to bring their definitions and policies around group homes closer into alignment with one another to improve transparency for residents and the efficiency and effectiveness of future regional planning endeavors. It is important to note that group homes, as traditionally defined, are no longer the preferred method of housing for persons with disabilities according to advocates. Group homes, however, are still one method of housing persons with disabilities within the community as opposed to institutionalization and, as such, jurisdictions should remain as open to group homes as possible.

3. Promote principals and best practices for affirmatively furthering fair housing through training and education at the Mississippi Chapter of the American Planners Association (APA MS), Mississippi Coast Building Officials Association (MCBOA) and Mississippi Municipal League (MML) events.

Jurisdictions and organizations receiving federal funding for housing are charged with affirmatively furthering fair housing. This means they must not only eliminate barriers to fair housing, but must do their due diligence to provide opportunities for fair housing choice and promote racial integration. The concept is broad and there are no set guidelines for how this is to be accomplished, making affirmatively furthering fair housing a difficult task for

many jurisdictions and organizations. Jurisdictions on the coast could greatly benefit from receiving training in regards to best practices for affirmatively furthering fair housing. In the absence of a permanent regional or state fair housing organization, an existing organization experienced in fair housing law such as the University of Southern Mississippi's Institute for Disability Studies (IDS) and/or the Mississippi Center for Justice (MCJ) could work with planning and building code officials and local leaders to provide training. Regional chapters of associations of planners, code officials and mayors could also proactively recruit speakers to discuss fair housing law and methods for affirmatively furthering fair housing at their regular events.

4. Advocate for the establishment of a permanent HUD and state recognized fair housing organization to serve the needs of the region.

Currently, there is no permanent fair housing organization to meet the needs of the region. While the State and local Analysis of Impediments (AI) list many agencies and organizations as fair housing agencies, all would need additional capacity to conduct outreach or intake complaints. The 2008 State AI found that the lack of a state-level housing service delivery system resulted in limited access to the fair housing complaint system and an impediment to fair housing. The fact that an average discrimination complaint takes nearly a year to resolve is evidence that routing cases through the federal system is inefficient and burdensome for residents. The region would greatly benefit from a regional or state-level fair housing enforcement agency that could expedite claims, respond more urgently to fair housing needs, and proactively provide fair housing outreach and education. Ideally, this organization would be established through state-level enabling legislation not only to give it legitimacy, but to designate a permanent funding stream.

5. Fund accessibility audit to determine compliance with the Fair Housing Amendments Act (FHAA) and Section 504 building standards.

In 2004, the Gulf Coast Fair Housing Center conducted an accessibility audit of twenty multifamily housing complexes constructed after 1991 (when the 1988 amendment went into effect) to determine the level of compliance with the Fair Housing Act. The audit found that 75% of the complexes failed to meet one or more of the accessibility requirements. The audit also noted that the vast majority of multifamily apartment complexes on the Gulf Coast were constructed prior to 1991, and therefore almost certainly did not comply with Fair Housing Act accessibility standards.

Hurricane Katrina destroyed many of these older complexes, and special tax credit provisions enabled the construction of a substantial amount of multifamily housing since 2005. Therefore, it is likely that there is greater

compliance with Fair Housing Act accessibility standards now than in 2004. Nevertheless, all four local AIs cited a lack of accessible housing as a prime impediment to fair housing, indicating the persistence of the problem. A current accessibility audit would be helpful in determining where progress has been made and where opportunities for improvement still remain.

6. Encourage partnership between existing disability rights organizations, developers, jurisdiction leaders and building code departments to ensure code enforcement.

Both privately owned and publicly assisted housing, regardless of whether they are rental or for sale units, must meet the accessibility requirements of the Fair Housing Amendments Act (FHAA) when they are located in a building of four or more units, built for first occupancy after March 13, 1991. In addition, all federally assisted new construction housing developments with 5 or more units are subject to accessibility requirements in Section 504 of the Rehabilitation Act. Finally, Title II of the Americans with Disabilities Act of 1990 (ADA) covers housing provided by public entities (state and local governments). There are resources available to help developers comply with these requirements such as the Fair Housing Act Accessibility Guidelines, but the requirements are numerous and complicated to understand. In order to ensure full compliance, disability rights organizations should work closely with developers, jurisdiction leaders and building code officials.

7. Establish a regional housing trust fund program to help remove barriers to accessibility for persons with disabilities.

A regional housing trust fund, as recommended on page two of this report, can include a variety of programs designed to meet the specific housing needs of the Mississippi gulf coast. One program of a Mississippi Gulf Coast Housing Trust Fund might support projects aimed at removing barriers for persons with disabilities. These projects might include single family home renovations or multifamily properties built pre-1991 that need to be brought up to code. Funds could be used in conjunction with or independent of existing programs and financing opportunities. Specific goals and requirements should be determined by the administering agency with guidance from the board of the trust fund and informed by a regional housing coalition, also recommended on page two of this report.

8. Consider instating a regional housing mobility program targeted at the most segregated communities as identified in the FHEA and encouraging residents to locate in areas of higher opportunity and outside areas of concentrated poverty.

A regional housing mobility program is a way of assisting lower income families and recipients of Housing Choice Vouchers (HCV) to locate in areas

of higher opportunity. Assistance through housing mobility programs can include landlord development, outreach, pre-search counseling, housing search assistance and post-move support. Many different kinds of organizations can operate housing mobility programs, including PHAs, community-based not-for-profit groups, fair housing advocacy and enforcement organizations, government agencies, private for-profit companies, and various combinations of these. Funding often comes through private donors, foundations, or HUD programs like the Community Development Block Grant (CDBG) program, Fair Housing Assistance Program (FHAP), Fair Housing Initiatives Program (FHIP), and the Housing Counseling Program. Funding could also come through a Mississippi Gulf Coast Housing Trust Fund as recommended on page two of this report. In February 2013, the Urban Institute and the Poverty & Race Research Action Council (PRRAC) published *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program*. This toolkit provides a step-by-step outline and extensive resources for public housing agencies, state and local governments, and nonprofits interested in helping housing choice voucher families make moves to higher-opportunity areas. A MS Gulf Coast Regional Housing Coalition as recommended in the Regional Housing Recommendations report should consider implementing a regional housing mobility program.

In addition to housing-specific recommendations, several of the recommendations coming out of the work of the Economic Development and Workforce Subcommittee and Transportation and Land Use Subcommittee directly address concerns raised in the FHEA. Several of the RCAPs identified were situated in areas of low and very low opportunity, specifically socioeconomic opportunity. In these areas, lack of affordable childcare options and lack of reliable transportation were identified as two of the main barriers to employment. The Economic Development and Workforce Subcommittee recommend studying the availability of and access to affordable childcare options to better understand and address the lack of childcare. The Transportation and Land Use Subcommittee recommends supporting paratransit service to bridge gap between assisted housing development and existing public transit network. They also recommend monitoring the need for late night transportation supporting regional employment requirements generated by a growing 24-hour economy and advocate for such services as this was identified as a major gap in the current public transportation system.

The majority of the RCAPs in the region are located in or adjacent to existing downtowns. Many of the Economic Development and Workforce recommendations seek to achieve the goal of preserving and strengthening downtowns in the region. Investing in and revitalizing the regions' downtowns would serve to bring opportunity to many of these struggling neighborhoods.

Another recommendation is to target industries and employers paying higher than average wage rates. This, coupled with strategies for better preparing the workforce, would serve to improve residents' financial situations and increase access to

opportunity. To address potential equity issues spurred by new development or the arrival of new industries, the Economic Development and Workforce Subcommittee recommends exploring community benefits agreements for major new development – industrial, commercial or waterfront.

The strategies listed above represent just a snapshot of the recommendations included in the *Plan for Opportunity* that are relevant to the findings of the FHEA. The complete plan and all final reports and recommendations are publically available and can be accessed at gulfcoastplan.org.

The Mississippi Gulf Coast Fair Housing and Equity Assessment will continue to be an important resource as the *Plan for Opportunity* develops and is implemented and will be a central part of future engagement with jurisdictions, organizations and community groups in the region. Continuing the work of the FHEA will be a challenge for the region because there is currently no infrastructure or designated funding source for addressing housing at a regional scale. In the absence of a regional governing body the Housing Subcommittee recommends forming a regional housing coalition to be made up of existing organizations and jurisdictions on the coast under a formal memorandum of agreement. It is also recommended that HUD establish clearer guidance on Regional Analyses of Impediments and communicate directly with the entitlement jurisdictions in the region regarding the benefits and funding implications of participation in a RAI. It is the hope of the partners of the *Plan for Opportunity* that this Fair Housing and Equity Assessment will set a precedent for a more regional approach to future evaluations of fair housing compliance and opportunity planning for the Mississippi Gulf Coast Region.

Notes:

¹ The Fair Housing Center of Greater Boston, *Historical Shift from Explicit to Implicit Policies Affecting Housing Segregation in Eastern Massachusetts*, (undated), <http://www.bostonfairhousing.org/timeline/1934-1968-FHA-Redlining.html>.

² Bringing History Home, Mississippi Jim Crow Laws: Mississippi Close (2005), http://www.bringinghistoryhome.org/assets/bringinghistoryhome/3rd-grade/unit-2/activity-5/3_Mississippi_JimCrow.pdf.

³ Soria City is an early 20th century subdivision in Gulfport divided by the L&N railroad track. The southern beachfront portion is white and the portion north of the railroad is black.

⁴ Forest Heights in north Gulfport is a residential subdivision purchased from a public housing authority that has a long history of severe flooding because of its construction on low-lying swamp lands. Further downstream, the historic Turkey Creek community was founded by two families of newly emancipated slaves.

⁵ Deeds may be found on file at the Harrison County Clerk's Office. Racially restrictive provisions include "No portion of said premises shall be conveyed or leased to any other than persons of the Caucasian Race" and "This property shall never be sold, leased, transferred, donated, willed, or assigned to a negro, or negroes, nor persons of African descent, nor ever be used or occupied by such persons, except in the employ of the bona-fide owner or resident."

⁶ *Shelley v. Kraemer*, 334 U.S. 1, 20 (1948).

⁷ Days, III, Drew S., *Rethinking the Integrative Ideal: Housing*, 33 McGeorge L. Rev. 459, 463 (2002).

⁸ Brooks, Richard R.W. and Rose, Carol M., *Racial Covenants and Segregation, Yesterday and Today* 13 (Straus Institute Working Paper No. 08, 2010), available at <http://www.nyustraus.org/pubs/0910/docs/Rose.pdf>.

⁹ The Moss Point information derives primarily from research assistance and interviews with Moss Point Community Development Administrator Daphne Viverette and Moss Point Alderman Sherwood Bradford.

¹⁰ Charles, Camille Z., *Can We Live Together? Racial Preferences and Neighborhood Outcomes in The Geography of Opportunity* 45 (de Souza Briggs, Xavier ed., Brookings 2005).

¹¹ de Souza Briggs, Xavier *The Geography of Opportunity*, 4 (Brookings, 2005) (expressing surprise at the "dearth" of "well-developed" research on the "forces driving racial and economic segregation in housing patterns . . .").

¹² United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 3.

¹³ United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 1.

¹⁴ United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 3.

¹⁵ United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 4.

¹⁶ United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 4.

¹⁷ United States Department of Justice. (2011). "United States' Investigation of the State of Mississippi's Service System for Persons with Mental Illness and Developmental Disabilities." Memorandum to The Honorable Haley R. Barbour, Governor, State of Mississippi. December 22, 2011. Page 21.

¹⁸ Allen Fishbein and Patrick Woodall, "Subprime Cities: Patterns of Geographic Disparity in Subprime Lending" (Consumer Federation of America, September 8, 2005), 9.

¹⁹ "Recovering States? The Gulf Coast Six Months After the Storms" (Oxfam America briefing paper, February 2006), 8.

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- ²⁰ Federal Deposit Insurance Corporation. FDIC National Survey of Unbanked and Underbanked Households. <http://www.fdic.gov/householdsurvey/2012_unbankedreport.pdf>. September 2012. Pg. 11.
- ²¹ Federal Deposit Insurance Corporation. FDIC National Survey of Unbanked and Underbanked Households. <http://www.fdic.gov/householdsurvey/2012_unbankedreport.pdf>. September 2012. Pg. 14.
- ²² Federal Deposit Insurance Corporation. FDIC National Survey of Unbanked and Underbanked Households. <http://www.fdic.gov/householdsurvey/2012_unbankedreport.pdf>. September 2012. Pg. 29.
- ²³ Legal Action Center. "After Prison: Roadblocks to Reentry." 2004. Pg.21. < http://www.lac.org/roadblocks-to-reentry/upload/lacreport/LAC_PrintReport.pdf>
- ²⁴ Quattrucci & Company. (2011). Market Study and Analysis. Prepared for Gulf Coast Renaissance Corporation. April 2011. Page 12.
- ²⁵ University of Southern Indiana's Center for Applied Research for Vanderburgh Community Foundation. "Understanding the Cycle of Poverty that Occurs in Successive Generations." 2010. <http://www.vanderburghcommunityfoundation.org/uploads/9/USI_-_final_report.pdf>.
- ²⁶ University of Southern Indiana's Center for Applied Research for Vanderburgh Community Foundation. "Understanding the Cycle of Poverty that Occurs in Successive Generations." 2010. Pg. 28. <http://www.vanderburghcommunityfoundation.org/uploads/9/USI_-_final_report.pdf>.
- ²⁷ U.S. Department of Housing and Urban Development. (n.d.). Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide. The Fair Housing Information Clearinghouse. Page 1-1
- ²⁸ The Fair Housing Amendments Act of 1988 uses the term *handicap* instead of the term *disability*. Both terms have the same legal meaning, see *Bragdon v. Abbott*, 524 U.S. 624, 631 (1998), but *disability* is more widely accepted. This document uses the term *ability*, which does not connote an individual condition either positively or negatively.
- ²⁹ Ibid. Page 1-2
- ³⁰ Ibid. Page 2-6
- ³¹ Ibid. Page 2-11
- ³² Western Economic Services, LLC. (2008). The 2008 Mississippi Analysis of Impediments to Fair Housing Choice. Prepared for MDA. November 2008. Pages 3-4.
- ³³ U.S. Department of Housing and Urban Development. (n.d.). Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide. The Fair Housing Information Clearinghouse. Pages 1-2.
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- ³⁵ National Fair Housing Alliance. A Step in the Right Direction: 2010 Fair Housing Trends Report. May 2010. Web. Pg. 12.
- ³⁶ Ibid. Page 63.
- ³⁷ Ibid. Page 63.
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- ³⁹ Western Economic Services, LLC. (2008). The 2008 Mississippi Analysis of Impediments to Fair Housing Choice. Prepared for MDA. November 2008. Page 76.
- ⁴⁰ U.S. Department of Housing and Urban Development. (2011). Housing Discrimination Cases Completed in MS 1/1/2005 thru 12/31/2010. Regional Administrator Region IV. November 18, 2011.
- ⁴¹ Jimmy G. Gouras Urban Planning Consultants, Inc. (2007). Analysis of Impediments to Fair Housing, Biloxi Mississippi. 2007; and Jimmy G. Gouras Urban Planning Consultants, Inc. (2007). Analysis of Impediments to Fair Housing, Gulfport Mississippi. 2007.
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- ⁴⁵ Gulf Coast Fair Housing Center. (2004). Rental Housing Accessibility Audit. Gulfport, MS. Page 8.

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⁴⁷ Nichols Planning & Consulting, LLC. (2011). Analysis of Impediments to Fair Housing Choice. Prepared for the City of Pascagoula. 2011. Pages 29-30.

⁴⁸ Nichols Planning & Consulting, LLC. (2008). City of Moss Point 2008 Analysis of Impediments to Fair Housing Update. 2008. Page 7.

⁴⁹ See Insurance section.

⁵⁰ *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365 (1926).

⁵¹ U.S. Department of Housing and Urban Development. (n.d.). Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide. The Fair Housing Information Clearinghouse. Page 5-6.

⁵² Ibid. Page 2-18

⁵³ Ibid. Pages 5-6 – 5-7

⁵⁴ Knaap, Gerritt, et. al. (2007). Zoning as a Barrier to Multifamily Housing. American Planning Association Report #548. 2007. Page 6.

⁵⁵ U.S. Department of Housing and Urban Development. (n.d.). Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide. The Fair Housing Information Clearinghouse. Pages 2-16 – 2-17

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⁵⁷ Gulf Coast Community Design Center. (2009). Development Standards Reference Guide. Prepared for the Gulf Coast Renaissance Corporation. 2009. Page 60.

⁵⁸ Mississippi Codes of 1972, Title 17, sections – 17-1-15, and 17-1-17.

⁵⁹ Slaughter and Associates, PLLC. City of Bay St. Louis Zoning Ordinance. Prepared for the City of Bay St. Louis. September 2010. Web. Page 9 and City of Waveland. Zoning Ordinance. Web. Page 8.

⁶⁰ Hessel and Associates. Zoning Ordinance. Prepared for the City of Long Beach. 2002. Web. Page 7; City of Gautier. Unified Development Ordinance. 2009. Web. Article II, Page 16; City of Biloxi. Land Development Ordinance. 2010. Web. Page 16; City of D'Iberville. Comprehensive Zoning Ordinance. 1995. Page 2053; City of Gulfport. Code of Ordinances, Appendix A: Zoning. 2010. Web. Page 5; City of Moss Point. Zoning Ordinance. 2010. Web. Page 7; and Clarion Associates. Unified Development Ordinance. Prepared for the City of Pascagoula. February 2011. Web. Page 10-15.

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⁶³ *Regional Economic Community Action Program, Inc. v. City of Middletown*, 294 F.3d 35, 48-52 (2d Cir.), *cert. denied*, 537 U.S. 813 (2002); *see also Tsombanidis v. West Haven Fire Dep't*, 352 F.3d 565, 579-80 (2d Cir. 2003) (factors showed that denial of permit for group home for recovering substance abusers was motivated by discriminatory intent); *Easter Seal Society of New Jersey, Inc. v. Township of North Bergen*, 798 F. Supp. 228, 234 (D.N.J. 1992); *Oxford House-Evergreen v. City of Plainfield*, 769 F. Supp. 1329, 1343 (D.N.J. 1991); *Fowler v. Borough of Westville*, 97 F. Supp. 2d 602, 611-13 (D.N.J. 2000).

⁶⁴ *Larkin v. Michigan Dep't of Social Services*, 89 F.3d 285, 289-92 (6th Cir. 1996) (holding that 1,500 foot dispersion requirement violated the FHAA); *Children's Alliance v. City of Bellevue*, 950 F. Supp. 1491, 1496-1500 (W.D. Wash. 1997); *ARC of New Jersey, Inc. v. New Jersey*, 950 F. Supp. 637, 644-46 (D.N.J. 1996) (holding that dispersion requirements were discriminatory classifications); *Association for Advancement of the Mentally Handicapped, Inc. v. City of Elizabeth*, 876 F. Supp. 614, 618, 621-25 (D.N.J. 1994) (holding that dispersion requirement that precluded community residents for six or more persons within 1,500 feet of an existing residence for victims of domestic violence or a school or day care center violated FHAA); *Horizon House Developmental Services, Inc. v. Township of Upper Southampton*, 804 F. Supp. 683, 693-95 (E.D. Pa. 1992) (holding that dispersion requirement that precluded group homes within 1,000 feet of each other violated FHAA), *aff'd mem.*, 995 F.2d 217 (3d Cir. 1993); *cf. Oconomowoc Residential Programs, Inc. v. City of Greenfield*, 23 F. Supp. 2d 941, 950-55 (E.D. Wis. 1998) (holding that density and dispersion requirements were not facially invalid but that they were preempted by FHAA). *Contra Family style of St. Paul v. St. Paul*, 923 F.2d 91, 94-95 (8th Cir. 1991) (holding that statute requiring group homes to be located at least one-quarter mile from each other absent a conditional use or special use

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APPENDIX A: Housing Subcommittee

The Housing Subcommittee of the *Plan for Opportunity* was charged with analyzing the current housing landscape on the Mississippi Gulf Coast; identifying housing and housing related issues; and developing recommendations to be incorporated into the final plan. Subcommittee members are representatives from housing and housing service organizations from across the Mississippi Gulf Coast. Under the guidance of the Gulf Coast Community Design Studio, these subcommittee members were responsible for making sure the voices of residents from across the coast, especially traditionally underserved populations, were represented in the work and supported with the final recommendations.

Housing Subcommittee

Joe Cloyd	Private Developer
Phil Eide	Hope Enterprise Corporation
Ashley Endris	Latter & Blum – Shaw Properties
Charmel Gaulden	Gulf Coast Fair Housing Center (2011–2012)
Monica Gonzalez	Enterprise Community Partners
Cassie Hicks	USM Institute for Disability Studies
Sarah Landry	Mercy Housing & Human Development
Janine Lee	Bay Waveland Housing Authority
Everett Lewis	Back Bay Mission
Jerrie Magruder	HUD Office of Fair Housing and Equal Opportunity
Chris Monforton	Habitat for Humanity of the Mississippi Gulf Coast
Reilly Morse	Mississippi Center for Justice
Steve Nettles	Lemon–Mohler Insurance
Rhonda Rhodes	Hancock Housing Resources Center
Camille Schafer	Gulf Coast Renaissance Corporation
Demetria Simpson	South Mississippi Housing and Development Corporation
Greg Smith	Mississippi Home Builders Association
Cindi Tarver	Steps Coalition/Gulf Coast Fair Housing Center
Helen Werby	Biloxi Housing Authority
Lori West	CLIMB CDC
Matt Williams	Mississippi Center for Justice
Amy Wood	Amy Wood Properties

16) What is your race/ethnicity? Please choose one or more.

- ☐ White
☐ Black or African-American
☐ Asian
☐ Hispanic
☐ Native Hawaiian or Pacific Islander
☐ American Indian or Alaska Native
☐ Other: _____

17) Address:

Street Number: _____
 City: _____
 State: _____
 Zip: _____

18) Would you be interested in participating in additional surveys or focus groups?

- ☐ Yes (go to question 19)
☐ No (end of survey)

The information gathered from this survey is for research purposes only. Responses will be reported in aggregate form only and will not be provided to third parties with personal identifier information.

19) Please provide contact information

Name: _____
 Phone number: _____
 Email address: _____
 Other: _____

THANK YOU FOR YOUR PARTICIPATION IN THIS SURVEY!

If you have any questions, please contact Allison Beasley or Jared Clay at Southern Mississippi Planning and Development District - 228-868-2311.



EMPLOYMENT PARTICIPATION SURVEY

WE WANT TO KNOW!

- Are you satisfied with your current job?
- Do you earn the salary you think you deserve?
- Are you unemployed?
- Do you have "barriers" to employment, such as transportation or childcare issues, health concerns, substance abuse or mental health difficulties, a criminal history, financial or housing worries?

The Plan for Opportunity is a collaborative planning project intended to guide the economic growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The 3-year planning process is guided by a group of stakeholder committees which has been organized and expanded over the course of the plan to include city and county leadership, key community and public partners, and residents of the region.

Plan for Opportunity is directed by a partnership of regional and local organizations, including Gulf Regional Planning Commission, Southern Mississippi Planning and Development District, Mississippi State University's Gulf Coast Community Design Studio, the Gulf Coast Renaissance Corporation, Mississippi Center for Justice, Steps Coalition, The Ohio State University, and The Kirwan Institute.

For more information about the Plan for Opportunity, visit www.gulfcoastplan.org.

The information gathered from this survey is for research purposes only. Responses will be reported in aggregate form only and will not be provided to third parties with personal identifier information.

The work that provided the basis for this publication was supported by funding under an award from the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. The author and publisher are solely responsible for the accuracy of the statements and interpretations contained in this publication. Such interpretations do not necessarily reflect the views of the Government.

1) Which of the following best describes your employment status?

- ☐ Self Employed (go to question 2)
☐ Employed, working 1-39 hours per week (go to question 2)
☐ Employed, working 40 or more hours per week (go to question 2)
☐ Not employed, looking for work (go to question 8)
☐ Not employed, NOT looking for work (go to question 12)
☐ Retired (go to question 13)

2) Which of the following best describes your current occupation?

- ☐ Architecture and Engineering
☐ Arts, Design, Entertainment, Sports, and Media
☐ Building and Grounds Cleaning and Maintenance
☐ Business and Financial
☐ Casino/Gaming, list job title: _____
☐ Community and Social Service
☐ Computer and Mathematical
☐ Construction and Extraction
☐ Education, Training, and Library
☐ Farming, Fishing, and Forestry
☐ Food Preparation and Serving
☐ Healthcare Practitioners and Technical
☐ Healthcare Support
☐ Installation, Maintenance, and Repair
☐ Legal
☐ Life, Physical, and Social Science
☐ Management
☐ Office and Administrative Support
☐ Personal Care and Service
☐ Production
☐ Protective Service (police and fire)
☐ Sales and Related
☐ Transportation and Material Moving
☐ Other: _____

3) Are you currently a member of a trade union?

- ☐ Yes (go to question 4)
☐ No (go to question 5)

4) If you are a union member, which union are you associated with?

- ☐ IAM - International Association of Machinist and Aerospace Workers
☐ IBEW - International Brotherhood of Electrical Workers
☐ IRT - International Brotherhood of Teamsters
☐ ILA - International Longshoremen's Association
☐ PPF/UA - Plumbers and Pipe Fitters Union
☐ SMW - Sheet Metal Workers International Association
☐ Other: _____

5) What is your approximate annual salary?

- ☐ Less than \$10,000
☐ \$10,000 to \$15,000
☐ \$15,001 to \$20,000
☐ \$20,001 to \$25,000
☐ \$25,001 to \$30,000
☐ \$30,001 to \$35,000
☐ \$35,001 to \$40,000
☐ \$40,001 to \$45,000
☐ \$45,001 to \$50,000
☐ Over \$50,000

6) Are you satisfied in your current position?

- ☐ Yes (go to question 13)
☐ No (go to question 7)

7) If no, what issues do you have with your current occupation?

- ☐ Hours and/or Schedule
☐ Management/Supervisor
☐ Position
☐ Wage
☐ Other: _____

>Go to question 13

8) If not employed, but currently looking for work, how would you describe this experience?

- ☐ Excellent
☐ Above average
☐ Average
☐ Below average

9) How long have you been unemployed and looking for work?

- ☐ Less than 2 weeks
☐ 2 weeks to 1 month
☐ 1 to 2 months
☐ 2 to 3 months
☐ 3 to 4 months
☐ 4 to 5 months
☐ 5 to 6 months
☐ More than 6 months

12) If not employed, NOT looking for work. Why?

- ☐ Believe there is no job for you
☐ Care for spouse, parent, or other family member
☐ Enrolled in education or training program
☐ No childcare
☐ Not interested in working
☐ No transportation to and from work
☐ Temporary illness or injury
☐ Other: _____

10) Have you utilized any of the following services from your local WIN Job Center or other job assistance program? If so, please check one or more.

- ☐ Career and aptitude test
☐ Career assistance for ex-offenders
☐ Computer skills training
☐ Job search and placement assistance
☐ Resume preparation assistance
☐ Services for Veterans
☐ Temporary hiring agency
☐ Other: _____
☐ None of the above

13) What is the highest level of education you have completed?

- ☐ 9th grade
☐ 10th grade
☐ 11th grade
☐ Graduated from High School or GED
☐ Some College
☐ Associates or Technical/Vocational Degree
☐ Bachelors or equivalent four year Degree
☐ Some Graduate School
☐ Completed Graduate School

14) Which category below includes your age?

- ☐ 17 or younger
☐ 18 - 20
☐ 21 - 29
☐ 30 - 39
☐ 40 - 49
☐ 50 - 59
☐ 60 or older

15) What is your sex?

- ☐ Male
☐ Female

APPENDIX C: FHEA Factsheet



FHEA

Fair Housing and Equity Assessment for the Mississippi Gulf Coast Region

WHAT IS A FAIR HOUSING AND EQUITY ASSESSMENT

Developing a Fair Housing and Equity Assessment (FHEA) is a requirement under the Sustainable Communities Regional Planning Grant initiative and a key part of understanding sustainability:

Sustainability includes creating "geographies of opportunity," places that effectively connect people to jobs, quality public schools, and other amenities. Today, too many families are stuck in neighborhoods of concentrated poverty and segregation, where one's zip code predicts poor education, employment, and even health outcomes. These neighborhoods are not sustainable in their present state.

The purpose of the FHEA is to identify and address these inequalities in opportunity.

The end result of this regional scale analysis is to understand the historical, current, and future context for equity and opportunity in the region and to integrate the findings into the planning process and the recommendations into the final Plan for Opportunity.

HOW TO USE THIS ASSESSMENT

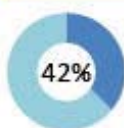
The FHEA focuses on the following five indicators identified and defined by HUD in order to gain a full picture of regional equity and access to opportunity:

1. Segregation and Integration;
2. Racially Concentrated Areas of Poverty;
3. Access to Existing Areas of High Opportunities;
4. Fair Housing Issues, Services, and Activities; and
5. Major Public Investments.

The FHEA is a public document meant to inform recommendations in the Plan for Opportunity and for use by the jurisdictions, organizations and community groups of the Mississippi Gulf Coast Region. It is meant, not only to provide a baseline for how the region is doing in terms of fair housing and equity, but to provoke thoughtful discussion and further research. It is the hope of the partners of the Plan for Opportunity that this FHEA will set a precedent for a more regional approach to future evaluations of fair housing compliance and opportunity planning for the Mississippi Gulf Coast Region.

5 Racially Concentrated Areas of Poverty in the Mississippi Gulf Coast Region

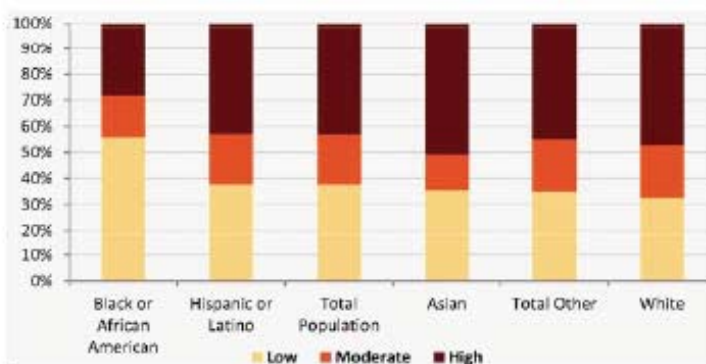
38% of the region's population live in areas of low or very low opportunity



Of all fair housing complaints within the state were filed in the three coastal counties

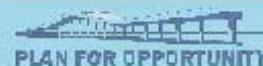
11.9

The average number of months it takes to process a fair housing complaint in the 3 coastal counties.



Some of the coast's minority populations are concentrated in areas of low opportunity, as charted above. Opportunity for the region is based on a series of indicators including public education, economics & mobility, housing, socioeconomics, and public health & security.

Visit gulfcoastplan.org to learn more about the Plan for Opportunity





FHEA

Fair Housing and Equity Assessment for the Mississippi Gulf Coast Region

STAKEHOLDER PERSPECTIVES



Many stakeholders from across the Mississippi Gulf Coast Region have been involved in the creation of this FHEA. Representatives from housing and social service agencies, advocacy organizations and the various jurisdictions have been instrumental in collecting and analyzing the information used in this report.

The overall response of these stakeholders is that the FHEA is a valuable tool that should be used not only in the Plan for Opportunity, but also by planners and public officials in the region as a basis for discussing future collaboration and investment. In addition, all were interested in continuing to collect data in order to monitor trends and progress over time.

Many agreed that the data analyzed in the FHEA is an excellent starting point for telling the story of fair housing on the coast and could be further enhanced by continued outreach and stakeholder involvement.

KEY FINDINGS & OPPORTUNITIES



Lack of fair housing infrastructure and awareness

- A regional fair housing organization is needed to proactively evaluate local practices and provide needed outreach and education (See Section 6).



Potential Fair Housing violations in zoning codes have been identified in various jurisdictions on the coast.

- Jurisdictions should review their zoning codes and make revisions to definitions and provisions that may limit access to fair housing (See Section 6).



Segregation trends and the effects of new programs, policies and investments need to be aggressively monitored.

- More can and should be done to proactively work towards increased integration across the coast and specifically in those parts of the region where higher segregation levels have been identified (See Section 3).



Work needs to be done throughout the state to improve Mississippi's service system for persons with mental and physical disabilities.

- Key barriers remain to transitioning persons with disabilities from institutions to a more integrated setting within communities including lack of adequate housing and access to services (See Section 5).



Some of the coasts' more vulnerable populations are concentrated in areas of lower opportunity

- Topical and geographic priority areas have been identified to focus future investment.
- Programmatic investment and policies aimed to improve opportunity, especially socioeconomic opportunity, throughout the region could greatly benefit underserved populations (See Section 5).

NEXT STEPS

The Plan for Opportunity partnership will engage residents and communities along the Mississippi Gulf Coast in dialogue about the role fair housing and other elements play in a more vibrant, healthy and prosperous region. You can share your ideas and perspectives by visiting the gulfcoastplan.org and by taking part at festivals and community forums.

"The effort to support more equitable and sustainable housing in the MS Gulf Coast depends on the involvement of many and diverse groups."

Source: Plan for Opportunity, Housing Stakeholder Assessment



facebook.com/planforopportunity

gulfcoastplan.org

The Plan for Opportunity is a collaborative planning project led by the Gulf Coast Regional Planning Commission that is intended to guide the economic growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The Plan for Opportunity is key to strengthening the economy, improving quality of life for residents, and creating a more sustainable future for the region.

The work that provided the basis for this publication was supported by funding under an award from the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. The author and publisher are solely responsible for the accuracy of the statements and interpretations contained in the publication. Such interpretations do not necessarily reflect the views of the Government.



APPENDIX D: Fair Housing Resources

U.S. Department of Housing and Urban Development (HUD)

Marilyn Moore-Lemons

Fair Housing and Equal Opportunity (FHEO) Director

100 West Capitol St., Room 910

Jackson, MS 39269

(601) 965-4700 x2111

Marilyn.moorelemons@hud.gov

www.hud.gov/mississippi

HUD Fair Housing Planning Guide (for local governments)

portal.hud.gov/hudportal/documents/huddoc?id=fhpg.pdf

Promoting Fair Housing (for CDBG funds, PHAs, and other programs)

[Promoting Fair Housing – HUD](#)

Reasonable Accommodations Under the Fair Housing Act: Joint Statement of the
Department of Housing and Urban Development and the Department of Justice

portal.hud.gov/hudportal/documents/huddoc?id=DOC_7771.pdf

An Outline of Principles, Authorities, and Resources Regarding Housing Discrimination
and Segregation

https://nhlp.org/files/Roisman,%20tri-state_fair_housing2.pdf

APPENDIX E: Regional Housing Recommendations

Mississippi Gulf Coast
Regional Housing Recommendations

Prepared By the Gulf Coast Community Design Studio

May 2013

Plan for Opportunity

The *Plan for Opportunity* is a collaborative planning project intended to guide the sustainable growth and development of the Mississippi Gulf Coast and to improve housing, employment and transportation opportunities throughout the region. The three year planning process is guided by a group of stakeholder committees which have been organized and expanded over the course of the plan to include city and county leadership, key community and public partners, and residents of the region. The Housing Subcommittee is charged with analyzing the current housing landscape on the Mississippi Gulf Coast; identifying housing and housing related issues; and developing recommendations to be incorporated into the final plan. The Housing Subcommittee has prepared the following recommendations to support the sustainability of the region's housing stock and overall housing system.

Housing Subcommittee

Joe Cloyd	Private Developer
Phil Eide	Hope Enterprise Corporation
Ashley Endris	Latter & Blum – Shaw Properties
Charmel Gauden	Gulf Coast Fair Housing Center (2011–2012)
Monica Gonzalez	Enterprise Community Partners
Cassie Hicks	USM Institute for Disability Studies
Caleb Koonce	USM Institute for Disability Studies
Sarah Landry	Mercy Housing & Human Development
Janine Lee	Bay Waveland Housing Authority
Everett Lewis	Back Bay Mission
Jerrie Magruder	HUD Office of Fair Housing and Equal Opportunity
Chris Monforton	Habitat for Humanity of the Mississippi Gulf Coast
Reilly Morse	Mississippi Center for Justice
Steve Nettles	Lemon–Mohler Insurance
Rhonda Rhodes	Hancock Housing Resources Center
Camille Schafer	Gulf Coast Renaissance Corporation
Demetria Simpson	South Mississippi Housing and Development Corporation
Greg Smith	Mississippi Home Builders Association
Cindi Tarver	Steps Coalition/Gulf Coast Fair Housing Center
Helen Werby	Biloxi Housing Authority
Lori West	CLIMB CDC
Matt Williams	Mississippi Center for Justice
Amy Wood	Amy Wood Properties

Project Manager

David Perkes, AIA	Gulf Coast Community Design Studio
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Team Leader

Kelsey Johnson	Gulf Coast Community Design Studio
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ESTABLISHING A FOUNDATION FOR REGIONAL HOUSING PLANNING

In order to address many of the current housing and housing-related challenges in the Mississippi Gulf Coast region and to effectively plan for future housing challenges and opportunities, several key initiatives should be undertaken. These general initiatives will aid in the effectiveness and efficiency to which the more specific strategies outlined below can be implemented.

1. Establish a regional housing coalition.

A regional housing coalition should be formed in order to better understand the current and future housing needs of the Mississippi gulf coast region, monitor progress, and continue housing planning from a regional perspective. In addition, a regional housing coalition would enable continued collaboration between housing and housing-related service organizations as established under the *Plan for Opportunity*. In the absence of a regional governing body, a regional housing coalition could be made up of existing organizations and jurisdictions on the coast under a formal memorandum of agreement.

2. Establish a regional housing trust fund.

Regional housing trust funds help cities and counties work together to meet the housing needs of an entire region and leverage funding. Historically, housing trust funds were used as a way of funding affordable housing, but are now also used to support acquisition and preservation of affordable housing and to fund related services including retrofits. A Mississippi Gulf Coast Housing Trust Fund, programmed to meet the specific needs of the region, could significantly advance many of the housing goals of the *Plan for Opportunity*.

A regional housing trust fund needs three components to begin operation. The first is enabling legislation primarily for the purpose of establishing a dedicated revenue source or sources. Potential funding sources include CDBG funds, general funds, developer fees, taxes, loan repayment fees, etc. Ideally, funding is through dedicated revenues (i.e. taxes and fees) as opposed to being dependent on regular budget processes. The second component is an administering agency. This agency can be an existing agency such as the Gulf Coast Renaissance Corporation (GCRC) or a new organization that is authorized to collect and administer the funds. The third component is a board of directors consisting of representatives from housing organizations, housing-related service providers, jurisdictions in the region, and other community representatives. The purpose of the advisory board is to help develop programs within the fund and determine the specific eligibility requirements for those programs.

3. Continue to look at housing regionally through a Fair Housing and Equity Assessment or Regional Analysis of Impediments.

The *Plan for Opportunity* and, specifically, the Fair Housing and Equity Assessment represents the first step in regional housing analysis and planning for the Mississippi Gulf Coast Region. While the FHEA provides valuable baseline data, it is important to continue to monitor and plan for housing needs on the coast from a regional perspective. Not only will continued regional housing planning make the region more successful at addressing housing challenges on the coast, it will better position

the region to leverage additional state and national funding. A regional Fair Housing and Equity Assessment or Regional Analysis of Impediments would ideally become a regular task of a regional housing coalition.

GOAL 1: Improve the resiliency and building performance of the housing stock on the coast

CURRENT STATUS:

The Mississippi Gulf Coast is a region prone to hazardous weather conditions including hurricanes and flooding. Homes that are not built to withstand these conditions are not only unsafe for residents, but are costly to insure and repair or rebuild. In addition, increasing costs of energy needed to heat and cool under-insulated homes or homes that are not well sealed pose a significant burden to homeowners and renters alike. While residents want to make their homes stronger, safer and more energy efficient, those most in need of such improvements are often unable to secure financing or afford upfront costs. Elevation requirements geared to keep residents safe in flood-prone areas are costly to meet and pose a special challenge for seniors and persons with physical disabilities. These requirements also seem to be slowing the redevelopment of vacant property within the floodplain. Finally, while much progress has been made to improve the affordability of insurance in the region through efforts by independent insurance agents and the jurisdictions, many residents are still unaware of what they can do to reduce their insurance costs or still unable to afford post-Katrina increases.

OBJECTIVES:

- Improve all residents' knowledge of existing challenges and available resources for improving their housing resiliency.
- Increase jurisdictional capacity to address housing resiliency.
- Improve regional collaboration around housing resiliency.

INDICATORS:

- Increase in utilization of home improvement and retrofit programs.
- Increase in funds available for home improvement and retrofit programs.
- All jurisdictions participating in CRS program and an increase in CRS scores across the coast.
- Reduction in storm related insurance claims.
- Reduction in insurance premiums due to home improvements.
- Improvement in the scores in Building Code Effectiveness Grading Schedule (BCEGS) across the region.ⁱ

RECOMMENDED STRATEGIES:

1. Create a central location where residents and community leaders can learn more about the challenges and opportunities around elevated housing.

A central location consisting of a virtual website and physical storefront where residents can learn about the challenges and opportunities related to elevated housing would make the process of elevating new or existing housing easier for residents and would promote more efficient redevelopment on the coast. While elevated housing is not a new concept, it is relatively new to many residents on the Mississippi Gulf Coast. Following Hurricane Katrina, FEMA's Flood Insurance Rate Maps (FIRMs) were changed, increasing the area of the floodplain, bringing more residential property into flood zones, and increasing the number of residences requiring elevation. Simultaneously, the Base Flood Elevation (BFE) levels were increased, requiring many structures to be elevated to higher levels. Determining how to elevate a new or existing house and to what level is complicated and often overwhelming for the homeowner. A homeowner would need to gather information from building code departments, insurance agents, and architects, but may not know how to go about asking for the information that will get them the results they want. A central location that provides information and facilitates sound decision making would help address some of the challenges around elevated housing and promote opportunities.

2. Promote awareness of programs to rehabilitate and retrofit existing houses.

Despite the widespread damage caused by Hurricane Katrina, 37% of the housing stock in the region was built pre-1970 (14% in Hancock County and 26% in Harrison and Jackson Counties) and only 12% of housing on the coast was built after 2005 when the coastal jurisdictions adopted the International Building Code (IBC). There are many existing programs and funding opportunities on the coast to assist residents in rehabilitating and retrofitting their existing homes to increase storm resistance and energy efficiency. Not only will these retrofits improve building performance, they will also help many residents to lower insurance and utility costs. Many of the current programs are not receiving the level of participation expected in part due to high upfront costs and uncertain longer term benefits, but also due to lack of awareness. More effort should be made to promote the existing programs and funding opportunities, in addition to the benefits of retrofitting. Some of this can be accomplished through word of mouth and strong referral networks, but additional funding may need to be set aside for marketing purposes.

Existing resiliency retrofit programs include Mississippi Windstorm Underwriting Association's (MUWA) Retrofit Mitigation Program, Institute for Business and Home Safety (IBHS) FORTIFIED Home Program, Coastal Retrofit Mississippi, and Habitat for Humanity's Weatherization Innovation Pilot Program (WIPP). Energy efficiency retrofit programs include Mississippi Department of Health and Human Services' Low Income Housing Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP). In addition, various programs and rebates are offered through individual power companies including Mississippi Power's EarthCents Financing Program and Coast Electric and Singing River Electric Power Association's Comfort Advantage Program. Gulf Coast Renaissance Corporation's (GCRC) Green Loan Fund is available to homeowners to make repairs, retrofits and ADA accessibility enhancements to their homes.

3. Fund cost/benefit analysis of housing retrofits to support existing and future retrofit and rehabilitation programs.

High upfront costs and lack of knowledge about longer-term benefits is often a deterrent for housing retrofit projects. An analysis quantifying the direct and indirect costs and benefits associated with specific retrofit projects at the household, community and regional level would likely increase participation in and support of existing programs and guide future programs. This important information would also likely influence policies aimed at improving residential building performance.

4. Encourage jurisdictions to look at their inventory of rental housing stock, identify type(s) most in need of repair, and create a plan to address concerns.

The condition of many rental units, especially manufacture homes, is of concern on the coast. There are ways in which jurisdictions can establish a system of inspection and require certain maintenance and safety standards for rental units. Ocean Springs, for example, requires a basic safety inspection of rental manufactured homes every time power or utilities change names. Code Inspectors go in the unit and check for compliance with the International Property Maintenance Code which also covers the exterior and the grounds. In addition, Ocean Springs has ordinances pertaining to mobile home parks dealing with how they must be maintained. These measures have been successful and can be used as a model by other jurisdictions on the coast to improve the condition of their rental housing stock.

5. Establish a regional housing trust fund program to help improve the building performance of existing homes.

A regional housing trust fund, as recommended on page two of this report, can include a variety of programs designed to meet the specific housing needs of the Mississippi gulf coast. One program of a Mississippi Gulf Coast Housing Trust Fund might support retrofit projects aimed at improving building performance in terms of resiliency and energy efficiency. Funds could be used in conjunction with or independent of existing programs and financing opportunities. Specific goals and requirements should be determined by the administering agency with guidance from the board of the trust fund and informed by a regional housing coalition, also recommended on page two of this report.

6. Advocate for expansion of the Mississippi Department of Health and Human Services' Weatherization Assistance Program (WAP) to include multifamily properties and encourage power companies to create multifamily energy efficiency retrofit and/or rebate programs.

Current energy efficiency retrofit programs are not open to multifamily properties, and, as such, there are few incentives for multifamily property owners to improve building performance especially if the tenant is responsible for utility costs. There are, however, opportunities to expand existing programs and create new ones. The Department of Health and Human Services' Weatherization Assistance Program (WAP), for example, can include multifamily properties. Even though this program is federally funded, individual states are allowed to set priorities and decide if multifamily properties are eligible.ⁱⁱ There are also numerous examples where power companies have instated retrofit and rebate

programs for multifamily housing. Some examples include Mass Save's Multi-Family Retrofit Program, an initiative sponsored by Massachusetts' gas and electric utilities and energy efficiency service providers, and the California Multifamily Energy Efficiency Rebate Program (MEERP), a collaboration between the state's four major investor-owner utilities.

7. Educate residents and property owners on strategies for reducing insurance costs.

Mississippi's gulf coast saw a significant spike in wind and flood insurance costs following Hurricane Katrina. While these insurance costs will continue to remain high due to the susceptibility of the coast to hurricanes and floods, there are many things residents can do to reduce their insurance premiums including retrofitting, elevating above BFE and shopping around for insurance. Currently, many independent insurance agents and organizations such as Smart Home America and the Institute for Business and Home Safety are working to educate residents about ways to reduce insurance costs. Other existing homeowner education programs and housing service providers can incorporate insurance education components into their curriculum to further expand the reach of this important information. While housing affordability for all residents is a major goal of the *Plan for Opportunity*, having adequate insurance coverage is an important part of having resilient housing on the coast and, while there are many things residents can do to reduce their insurance premiums, reducing coverage is not recommended.

8. Encourage collaboration and information sharing between insurance companies, building code officials, city councils, boards of supervisors, code enforcement court officials and contractors on the importance of building to stronger standards and improving uniformity in code enforcement across the coast.

Building codes are an important part of making housing resilient and managing insurance costs on the coast. Much progress has been made on the coast following Hurricane Katrina and most of the jurisdictions are now in the process of adopting the 2012 IBC. In addition, most of the jurisdiction's building code departments meet regularly as part of Coastal Hazard Outreach Strategy Team (C-HOST) and/or Mississippi Coast Building Officials Association. These efforts are to be commended, but more can be done to improve information sharing and uniformity in code enforcement across the coast. Improvement can be measured in terms of the Jurisdiction's Building Code Effectiveness Grading Schedule (BCEGS) grades. Jurisdictions are classified on a scale of 1 to 10, with 1 being the best, and scores depend upon the local building code, the date it was adopted, and how well it is enforced. Scores on the coast range from 9 to 4. Not only do stronger building codes and better enforcement increase the resiliency of buildings on the coast, but better BCEGS scores also translate into reductions in wind pool premiums for residents.

9. Work with jurisdictions to join the Community Rating System (CRS) program and/or improve their CRS rating.

The Community Rating System (CRS) is a voluntary program for National Flood Insurance Program (NFIP) member communities to reduce both flood hazards and the cost of flood insurance for property owners within the community.ⁱⁱⁱ While most of the jurisdictions on the coast participate in the CRS program, there are still several that are not enrolled due to various reasons. Southern

Mississippi Planning and Development District (SMPDD), with funding from the Mississippi Department of Marine Resources (MDMR) along with other organizations such as the Mississippi Alabama Sea Grant Consortium (MASGC) have been working with the jurisdictions on the coast and the Coastal Hazard Outreach Strategy Team (C-HOST) to increase participation in the CRS program and improve scores. As a result of the efforts to date, three jurisdictions joined the program and seven more improved their scores. These efforts are to be commended and the jurisdictions and existing organizations on the coast should continue to look for ways to partner and pursue funding opportunities to ensure all communities on the coast are active participants and have the best scores possible.

10. Promote awareness of indoor air quality.

There is significant political and institutional momentum toward energy conservation in buildings leading to tighter building envelopes. While these efforts have had desirable results in terms of energy efficiency, they have also reduced air infiltration and air flow leading to indoor air quality concerns. Ventilation mechanisms are installed to maintain indoor air quality, but many of these mechanisms are mechanical and controlled by the resident(s). Proper use of these systems to maintain indoor air quality is reliant on the user having adequate information on how to operate the mechanisms. The general public, however, is not very knowledgeable about the role they play in protecting the indoor air quality in their homes. A strong public education campaign on indoor air quality is needed in conjunction with education about energy conservation so the public can more clearly understand the need for balancing these two objectives.

11. Encourage jurisdictions to offer development incentives for developers who employ best practices in regards to indoor air quality.

The IBC does include minimum ventilation or air change rate requirements, provisions for exhaust of known sources of contaminants, and specifications for moisture control; all important means of addressing indoor air quality concerns.^{iv} These measures, however, are the minimum and more can be done to improve indoor air quality in residential buildings. While jurisdictions may not want to go so far as to require higher standards such as those incorporated in some of the national green building standards for homes, they are encouraged to consider offering development incentives for builders who voluntarily choose to build to higher standards. Some of the national green building standards that address indoor air quality include the U.S. Environmental Protection Agency's (EPA) Energy Star/Indoor airPLUS program, the DOE's Builders Challenge program, the U.S. Green Building Council's (USGBC) LEED for Homes program, the National Association of Home Builder's (NAHB) National Green Building Program, Enterprise Green Communities and MASCO's Environments for Living program.^v Development incentives can range from reductions in taxes and fees to leniency in density, parking or setback requirements. Jurisdictions are encouraged to devise a set of development incentives that make the most sense for their community.

GOAL 2: Improve compliance with Fair Housing Law and increase access to fair housing.

CURRENT STATUS:

Access to fair housing defined by the Fair Housing Act as amended in 1988, is a key issue in the region that is intensified by the fact that there is no state-level fair housing enforcement agency or legislation in Mississippi and because the general public is not adequately informed about their fair housing rights. Under Fair Housing Law, no one may discriminate against potential renters, homeowners, or loan applicants based on race, color, national origin, religion, sex, familial status, or ability. People are also not allowed to impose rules or policies that have a disproportionate affect on a protected class even if that affect is unintentional. As part of the *Plan for Opportunity's* Housing Assessment, a review of fair housing compliance and current zoning regulations was conducted. Several barriers were identified including certain zoning regulations dealing with group homes and the definition of family; predatory lending practices; and inconsistent compliance with the Americans with Disabilities Act (ADA).

OBJECTIVES:

- Improve regional capacity to affirmatively further fair housing.
- Remove existing barriers to accessing fair housing.
- Address existing segregation and trends as identified in the *Plan for Opportunity's* Fair Housing and Equity Assessment (FHEA).

INDICATORS:

- Revision of zoning ordinances to remove all barriers to fair housing.
- Decrease in segregation across the region as measured by indicators in the *Plan for Opportunity's* Fair Housing and Equity Assessment (FHEA).
- Decrease in number of Housing Choice Voucher (HCV) recipients located in areas of concentrated poverty and lower opportunity.
- Increase in funds available to make residential units accessible.
- Increase in number of participants in accessibility retrofit programs.
- Increase in percent of fair housing complaints resolved.
- Decrease in average time to resolve a fair housing complaint.

RECOMMENDED STRATEGIES:

- 1. Encourage jurisdictions to review the definition of “family” in their zoning code and amend zoning ordinances to include a more inclusive definition.**

Definitions of “family” on the coast range from any group of individuals living together in a single housekeeping unit to only individuals related by blood or marriage. Some of these definitions can be limiting and even considered a barrier to fair housing choice. As part of the *Plan for Opportunity*, the Gulf Coast Community Design Studio (GCCDS) met with any jurisdictions whose zoning ordinance contains provisions that are potential violations of fair housing law. All jurisdictions on the coast, however, are encouraged to review the definition of “family” in their zoning ordinance and consider revising the definition to be more inclusive. In addition, jurisdictions are encouraged to bring their definitions closer into alignment with one another to improve transparency for residents and the efficiency and effectiveness of future regional planning efforts.

- 2. Encourage jurisdictions to review their policies in regards to group homes, revise their zoning ordinance to comply with Fair Housing Law, and allow group homes in residential zones.**

As part of the *Plan for Opportunity*’s Fair Housing and Equity Assessment (FHEA), jurisdictions’ definitions and policies around group homes were reviewed. Group homes are not allowed by right in most residential zones and several of the jurisdictions have definitions or dispersal requirements that could be considered a barrier to fair housing choice. As part of the *Plan for Opportunity*, the Gulf Coast Community Design Studio (GCCDS) met with any jurisdictions whose zoning ordinance contains provisions that are potential violations of fair housing law. All jurisdictions on the coast, however, are encouraged to review the definition of “group home” in their zoning ordinance and policies around group homes and consider making revisions to be more inclusive. Again, jurisdictions are encouraged to bring their definitions and policies around group homes closer into alignment with one another to improve transparency for residents and the efficiency and effectiveness of future regional planning endeavors. It is important to note that group homes, as traditionally defined, are no longer the preferred method of housing for persons with disabilities according to advocates. Group homes, however, are still one method of housing persons with disabilities within the community as opposed to institutionalization and, as such, jurisdictions should remain as open to group homes as possible.

- 3. Promote principals and best practices for affirmatively furthering fair housing through training and education at the Mississippi Chapter of the American Planners Association (APA MS), Mississippi Coast Building Officials Association (MCBOA) and Mississippi Municipal League (MML) events.**

Jurisdictions and organizations receiving federal funding for housing are charged with affirmatively furthering fair housing. This means they must not only eliminate barriers to fair housing, but must do their due diligence to provide opportunities for fair housing choice and promote racial integration. The concept is broad and there are no set guidelines for how this is to be accomplished, making affirmatively furthering fair housing a difficult task for many jurisdictions and organizations.

Jurisdictions on the coast could greatly benefit from receiving training in regards to best practices for affirmatively furthering fair housing. In the absence of a permanent regional or state fair housing organization, an existing organization experienced in fair housing law such as the University of Southern Mississippi's Institute for Disability Studies (IDS) and/or the Mississippi Center for Justice (MCJ) could work with planning and building code officials and local leaders to provide training. Regional chapters of associations of planners, code officials and mayors could also proactively recruit speakers to discuss fair housing law and methods for affirmatively furthering fair housing at their regular events.

4. Advocate for the establishment of a permanent HUD and state recognized fair housing organization to serve the needs of the region.

Currently, there is no permanent fair housing organization to meet the needs of the region. While the State and local Analysis of Impediments (AI) list many agencies and organizations as fair housing agencies, all would need additional capacity to conduct outreach or intake complaints. The 2008 State AI found that the lack of a state-level housing service delivery system resulted in limited access to the fair housing complaint system and an impediment to fair housing.^{vi} The fact that an average discrimination complaint takes nearly a year to resolve is evidence that routing cases through the federal system is inefficient and burdensome for residents. The region would greatly benefit from a regional or state-level fair housing enforcement agency that could expedite claims, respond more urgently to fair housing needs, and proactively provide fair housing outreach and education. Ideally, this organization would be established through state-level enabling legislation not only to give it legitimacy, but to designate a permanent funding stream.

5. Fund accessibility audit to determine compliance with the Fair Housing Amendments Act (FHAA) and Section 504 building standards.

In 2004, the Gulf Coast Fair Housing Center conducted an accessibility audit of twenty multifamily housing complexes constructed after 1991 (when the 1988 amendment went into effect) to determine the level of compliance with the Fair Housing Act. The audit found that 75% of the complexes failed to meet one or more of the accessibility requirements.^{vii} The audit also noted that the vast majority of multifamily apartment complexes on the Gulf Coast were constructed prior to 1991, and therefore almost certainly did not comply with Fair Housing Act accessibility standards.^{viii}

Hurricane Katrina destroyed many of these older complexes, and special tax credit provisions enabled the construction of a substantial amount of multifamily housing since 2005. Therefore, it is likely that there is greater compliance with Fair Housing Act accessibility standards now than in 2004. Nevertheless, all four local AIs cited a lack of accessible housing as a prime impediment to fair housing, indicating the persistence of the problem. A current accessibility audit would be helpful in determining where progress has been made and where opportunities for improvement still remain.

6. Encourage partnership between existing disability rights organizations, developers, jurisdiction leaders and building code departments to ensure code enforcement.

Both privately owned and publicly assisted housing, regardless of whether they are rental or for sale units, must meet the accessibility requirements of the Fair Housing Amendments Act (FHAA) when they are located in a building of four or more units, built for first occupancy after March 13, 1991. In addition, all federally assisted new construction housing developments with 5 or more units are subject to accessibility requirements in Section 504 of the Rehabilitation Act. Finally, Title II of the Americans with Disabilities Act of 1990 (ADA) covers housing provided by public entities (state and local governments).^{ix} There are resources available to help developers comply with these requirements such as the Fair Housing Act Accessibility Guidelines, but the requirements are numerous and complicated to understand. In order to ensure full compliance, disability rights organizations should work closely with developers, jurisdiction leaders and building code officials.

7. Establish a regional housing trust fund program to help remove barriers to accessibility for persons with disabilities.

A regional housing trust fund, as recommended on page two of this report, can include a variety of programs designed to meet the specific housing needs of the Mississippi gulf coast. One program of a Mississippi Gulf Coast Housing Trust Fund might support projects aimed at removing barriers for persons with disabilities. These projects might include single family home renovations or multifamily properties built pre-1991 that need to be brought up to code. Funds could be used in conjunction with or independent of existing programs and financing opportunities. Specific goals and requirements should be determined by the administering agency with guidance from the board of the trust fund and informed by a regional housing coalition, also recommended on page two of this report.

8. Encourage recipients of Housing Choice Vouchers to locate in areas of higher opportunity and outside areas of concentrated poverty.

The *Plan for Opportunity's* Fair Housing and Equity Assessment (FHEA) found that a higher percentage of Housing Choice Voucher (HCV) recipients were living in areas of lower opportunity and higher concentrations of poverty. The location of assisted housing options in areas of low opportunity may further impede these households' ability to rise out of poverty. The Bay-Waveland Housing Authority is currently including a map of concentrations of poverty in their HCV new tenant packages and encouraging recipients to locate outside of these areas. Lack of HCV landlords in areas of higher opportunity does not appear to be a problem in the region so working with tenants to choose more opportune areas to live should help mitigate the problem. Other administrators of HVCs are encouraged to adopt a system for working with new and existing tenants to locate in areas of higher opportunity and outside of areas of concentrated poverty if they have not done so already.

9. Consider instating a regional housing mobility program targeted at the most segregated communities as identified in the FHEA.

A regional housing mobility program is another way of assisting lower income families locate in areas of higher opportunity. Assistance through housing mobility programs can include landlord development, outreach, pre-search counseling, housing search assistance and post-move support. Many different kinds of organizations can operate housing mobility programs, including PHAs, community-based not-for-profit groups, fair housing advocacy and enforcement organizations, government agencies, private for-profit companies, and various combinations of these. Funding often comes through private donors, foundations, or HUD programs like the Community Development Block Grant (CDBG) program, Fair Housing Assistance Program (FHAP), Fair Housing Initiatives Program (FHIP), and the Housing Counseling Program. Funding could also come through a Mississippi Gulf Coast Housing Trust Fund as recommended on page two of this report. In February 2013, the Urban Institute and the Poverty & Race Research Action Council (PRRAC) published *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program*. This toolkit provides a step-by-step outline and extensive resources for public housing agencies, state and local governments, and nonprofits interested in helping housing choice voucher families make moves to higher-opportunity areas. A MS Gulf Coast Regional Housing Coalition as recommended on page two of this report should consider implementing a regional housing mobility program.

GOAL 3: Increase diversity of housing stock on the coast and improve access to affordable housing options

CURRENT STATUS:

The Mississippi Gulf Coast primarily consists of single family housing and the majority of the residential areas in the three coastal counties are zoned for single family residential development. While there is nothing inherently wrong with this type of development, there are many people, especially the more vulnerable populations on the coast including seniors, youth, homeless, and persons with disabilities, who remain challenged to find housing that is affordable and meets their needs. In addition, the population of the Mississippi Gulf Coast is aging and the number of older citizens is expected to increase significantly. Market trends, as outlined in the *Plan for Opportunity's* Housing Market Analysis, indicate a future decrease in demand for four plus bedroom houses and an increase in demand for accessible housing and urban housing close to key services. In order to make housing more accessible to vulnerable populations and to plan for future demand, the jurisdictions on the coast need to start making changes now to accommodate a more diverse housing stock.

OBJECTIVES:

- Increase housing options on the coast.
- Remove barriers to accessing existing housing.
- Address the housing needs of the more vulnerable populations.

- Increase jurisdictional capacity to promote housing diversity.

INDICATORS:

- Revision of zoning ordinances and comprehensive plans to promote housing diversity.
- Increase in number of Housing Choice Vouchers awarded to the region.
- Increase in number of transitional housing options with immediate shelter services.
- Decrease in number of households paying more than 30% of income toward housing expenses.
- Increase in variety of housing types available on the coast.

RECOMMENDED STRATEGIES:

1. Encourage jurisdictions to amend or remove minimum floor area requirements for single family homes especially in developable areas near transportation and services.

Several of the jurisdictions on the coast have minimum floor area requirements for single family homes. While this has not been identified as a significant barrier to affordable housing on the coast it may become more of an issue as the population and market demand changes. Seniors, for example, may prefer to live in a single family home, but be unable to afford or maintain a larger home. Removing minimum floor area requirements, especially in developable areas near transportation and other services, would allow residents more flexibility in building housing that meets their needs.

2. Educate jurisdictions, residents and developers on alternative housing options.

As previously mentioned, the Mississippi Gulf Coast has long been dominated by single family homes. Part of the prevalence of single family housing is likely due to cultural preference and historical precedent, but part of it may also be due to a lack of information or tangible examples of alternative housing types. Making jurisdictions, residents and developers aware of alternative housing options such as accessory dwelling units (ADUs) and their benefits may encourage the development of more diverse housing options better suited to residents current and future needs on the coast.

3. Encourage amendments to zoning ordinances that allow for a mix of housing types near existing infrastructure, transportation, employment and services.

Having housing that meets the needs of people of various income levels, age and ability near transportation, employment and other services increases the livability of an area and helps to reduce residents' housing and transportation costs. In order to accomplish this, jurisdictions need to make sure that zoning allows for a mix of housing types in these key areas. The jurisdictions are encouraged to locate these key areas with the help of the scenario planning tool developed by the *Plan for Opportunity*.

4. Encourage jurisdictions to promote housing diversity in comprehensive plans.

Comprehensive plans are an important mechanism for jurisdictions to set priorities and envision their future. As such, it is important that the jurisdictions in the region work to align certain key aspects of their comprehensive plans with the overarching goals of the region as established in the *Plan for Opportunity*. As part of the *Plan for Opportunity*, comprehensive plans for all jurisdictions in the region were analyzed in terms of livability and sustainability goals. The final report, *Assessing Gulf Coast Comprehensive Plans on Regional Livability*, indicates that the jurisdictions on the coast could do better at promoting housing diversity to meet the needs of people of various ages and abilities. The report also highlights Pass Christian as a good example of promoting diverse housing, especially in regards to the rising senior population. Jurisdictions are encouraged to review their comprehensive and specialized plans and to consider making revisions to promote diversity of housing to meet the needs of people of all ages and abilities.

5. Encourage education and outreach through existing senior centers and service organizations to assist seniors in planning for their current and future housing needs.

The *Plan for Opportunity's* Housing Stakeholder Analysis noted that a significant number of seniors on the coast are living on their own, many without a plan for aging in place or transitioning to more manageable housing. Many of the seniors interviewed prefer to live in their single family home, but are finding it increasingly difficult to maintain their home and access key services on a fixed income and in the absence of having family close by. Senior centers in all three counties are very active in providing immediate services to seniors in the region, but may consider expanding their work to help seniors plan for their current and future housing needs.

6. Encourage jurisdictions to offer incentives to developers to use universal design principles and to build housing for seniors and persons with disabilities in areas of high opportunity.

Universal design principals include a broad spectrum of ideas for improving the accessibility and visitability of buildings to people of all abilities. These principals go above and beyond the accessibility requirements found in building codes and fair housing law, but are becoming more common and highly encouraged as a means of making buildings and communities more accessible. The jurisdictions are encouraged to consider offering development incentives to builders who voluntarily incorporate universal design principals into their projects, especially in areas near transportation and key services. This would promote the development of housing that is more accessible to people of all ages and abilities. Development incentives can range from reductions in taxes and fees to leniency in density, parking or setback requirements. Jurisdictions are encouraged to devise a set of development incentives that make the most sense for their community.

7. Advocate for the incorporation of more universal design principals in Mississippi Home Corporation's (MHC) Qualified Allocation Plan (QAP) and Notifications of Funding Availability (NOFA) for HOME funds.

The Mississippi Home Corporation (MHC) is required to develop a Qualified Allocation Plan (QAP) to establish a means of consistently evaluating proposed projects for funding through the

Housing Tax Credit Program. The QAP assigns points based on certain criteria and priorities. Similarly, the Gulfport-Biloxi-Harrison County HOME Consortium administers funding from the HOME Investment Partnership Program (HOME) and develops a Notice of Funds Available (NOFA) to establish a rating system to evaluate proposed projects. MHC, the Gulfport-Biloxi-Harrison County HOME Consortium, and other housing fund administering agencies should consider awarding additional points for projects that include universal design principals.

8. Introduce state legislation to reduce the age a person is allowed to enter into a legal contract in Mississippi from 21 to 18 in compliance with federal standards.

The age at which one may enter into a legal contract without parental consent in Mississippi is 21, compared with the federal standard of 18. This Mississippi statute makes accessing housing challenging or impossible for many self sufficient young adults. It is recommended that legislation be introduced to reduce the age a person is allowed to enter into a legal contract in Mississippi from 21 to 18 in compliance with federal standards to remove what remains a significant barrier to housing for young adults. In the interim, it is recommended that a strong referral network be established between housing and housing service providers and legal service providers for youth who would like to be emancipated in order to access housing.

9. Establish a regional housing trust fund program to subsidize transitional housing and permanent supportive housing for the homeless.

The *Plan for Opportunity's* Housing Stakeholder Analysis identified a lack of transitional housing with immediate shelter services as a critical housing need on the coast. The Open Doors Coalition and member organizations are currently working to address this gap, but more public and political support and funding is needed to make significant advances. One significant step has been made with the approval of the Salvation Army Mississippi Gulf Coast Area Command's Center of Hope. This facility, to be located on 24th Avenue between 21st Street and 20th Street in Gulfport, is based on best practices from across the country and will likely be a model for transitional housing for the region. The facility will serve homeless families and single men and women. The facility will include 120 beds, a multipurpose room, a kitchen, administrative offices, meeting rooms, child play/study areas, and a chapel. In addition to shelter, drug and alcohol addiction support and employment and housing services will be provided.

Lack of permanent supportive housing is also a concern on the coast. HUD Continuum of Care funding is distributed by Open Doors Coalition to Back Bay Mission, the Aids Task Force, the Women's Center for Non-violence, and the Mental Health Center. The funding currently covers rent for 30 to 40 apartments. Continuum of Care funding is not likely to increase and more funding is required to satisfy the need for permanent supportive housing on the coast.

A regional housing trust fund, as recommended on page two of this report, can help fund transitional housing and permanent supportive housing on the Mississippi Gulf Coast. Funds could be used in conjunction with or independent of existing programs and financing opportunities. Specific goals and requirements should be determined by the administering agency with guidance from the board of the trust fund and informed by a regional housing coalition, also recommended on page two of this report. The ARCH Housing Trust Fund, a partnership of East King County, Washington

jurisdictions is an example of a regional housing trust fund that supports transitional and permanent supportive housing.

10. Continue to work with Federal agencies and Congress to increase funding levels for additional housing vouchers to help meet the demand for housing assistance in the Region.

The *Plan for Opportunity's* Housing Assessment and other recent housing reports indicate that there is not necessarily a lack of subsidized housing on the coast and several of the Low Income Housing Tax Credit (LIHTC) developments in the region consistently have trouble filling their units. Public Housing Authorities (PHA) in the region, however, have extremely long waiting lists for HCVs. This indicates that people on the coast have trouble affording even the subsidized housing options due, in part, to the prevalence of part time and low wage jobs among other barriers to adequate employment. The PHAs have consistently lobbied for more HCVs for the region and should continue to work with the local jurisdictions and housing organizations, including a regional housing coalition as recommended on page two of this report, to advocate for additional vouchers to meet the needs of the region.

GOAL 4: Improve financial literacy and increase access to housing finance

CURRENT STATUS:

South Mississippi has a large population that is financially illiterate and unable to qualify for housing financing due to poor or no credit or high debt-to-income ratios. In addition, predatory lending practices were identified in all four local AIs, as well as the State AI, as an impediment to fair housing. The State AI suggests that these practices are most common in geographic areas with high concentrations of minority populations. Local AIs found that predatory lending most often occurs because individuals and families cannot qualify for traditional loans due to poor credit history, high debt-to-income ratios, or insufficient funds for down payments. There are currently programs in place to address these problems, though additional funding and increased collaboration with private banks, public schools and other partners are needed to improve the effectiveness and increase the capacity of these programs to meet the needs of the region.

OBJECTIVES:

- Improve capacity of existing organizations to address financial literacy challenges.
- Improve regional collaboration around financial literacy and housing finance.
- Identify and remove barriers to improving financial literacy.

INDICATORS:

- Increase in participation in financial literacy and housing finance programs.
- Increase in funding for financial literacy and housing finance programs.

- Reduction in denials for mortgage loan applications.

RECOMMENDED STRATEGIES:

1. Encourage collaboration between housing resource centers and workforce and economic development agencies.

Housing needs for the Mississippi Gulf Coast region cannot be addressed without a strong economic and workforce development plan. Many of the people in the region who struggle with finding affordable housing also struggle to find adequate employment. As part of the *Plan for Opportunity*, Housing Subcommittee members met with members of the Economic and Workforce Development Subcommittee to discuss the connection between housing and jobs on the coast. Many of these housing and economic development leaders had never been in the same room before and the meeting was extremely productive and informative for all involved. It is recommended that housing and economic/ workforce development entities continue to build on the collaboration that was started in the *Plan for Opportunity*. This collaboration can be built into existing systems by housing organizations including economic and workforce development representatives on their boards and vice versa. An existing organization, such as Southern Mississippi Planning and Development District (SMPDD), can also coordinate regular meetings between these organizations to facilitate discussion and collaboration.

2. Encourage partnerships and information sharing between housing nonprofits, financial institutions, employers and local cultural centers such as churches to increase awareness of existing financial literacy programs and housing finance opportunities.

Financial illiteracy and the lack of many residents' ability to meet housing finance eligibility criteria is a significant barrier to accessing housing in the region. There are a number of existing financial literacy programs and campaigns currently working to improve residents' financial knowledge and aid them in repairing or improving their financial situations. In addition, there are several alternative housing finance programs geared toward people who are not able to get a conventional mortgage or need down payment and/or closing cost assistance. Strong referral networks and information sharing between organizations is critical to getting information about available resources to those most in need.

Existing financial literacy programs include credit assessment and credit repair services offered by the housing counseling agencies including Mercy Housing, Visions of HOPE, Hancock Resource Center, CLIMB CDC, HOPE CDA and Gulf Coast Renaissance Corporation (GCRC). Habitat for Humanity of the Mississippi Gulf Coast offers the *Invest in Yourself* Program that includes seminars, interactive workshops and one-on-one counseling focused on personal financial education. In addition, many of the financial institution offer financial literacy programs and tools. Regions Bank holds "Financial Fitness Friday" once a month to help customers assess their financial well-being and has an online tool called My GreenInsights that lets customers create a budget and alerts them when they are getting off track. Regions Bank employees are also involved in teaching financial literacy in schools so teens can learn to avoid bad credit issues early on. The Peoples Bank administers a school

savings program at elementary schools called Save for America. Children can make deposits at their schools and the money is deposited electronically in the bank.

GCRC and Habitat for Humanity both have in-house underwriting guidelines if borrowers are unable to qualify for a loan on the secondary market. GCRC also provides help to qualified homebuyers in the form of closing costs and down payment assistance through The Dream Fund. HOME Funds are offered by members of the Gulfport-Biloxi-Harrison County HOME Consortium that can go towards down payment assistance or closing costs.

3. Advocate for funding to promote awareness of existing financial literacy programs and housing finance opportunities.

As previously mentioned there are many active financial literacy programs and housing finance opportunities available on the coast. Many of these programs, if not all, are underutilized due primarily to lack of awareness. While stronger partnerships and referral networks will help raise awareness, more formal marketing and outreach efforts are also needed. Often very little of a program's operating budget is reserved for advertising and outreach and, as such, the administering organizations rely primarily on word of mouth. In order for these programs to reach their full potential, more funding needs to be acquired and/or designated for the purpose of marketing.

4. Conduct research to identify and address the attitudinal and behavioral barriers to improved financial literacy.

Improving financial literacy is not just a matter of providing good information, a fundamental change in behavior needs to occur. In 2008, the U.S. Treasury Department and the Organization for Economic Cooperation and Development (OECD) held an international conference on financial education. The final report suggested the benefits of conducting research to identify the attitudinal and behavioral barriers to improving financial literacy.^x Every region has a unique culture and mindset and the Mississippi Gulf Coast region is no different. A regional survey exploring the root causes of financial illiteracy would be beneficial for both new and existing programs and could inform any outreach campaigns. The survey could be distributed by housing, economic and workforce development, and advocacy agencies to existing clients as many of these organizations deal with people who struggle with their financial management.

5. Advocate for more programs addressing remediation of past criminal records as a means of removing barriers to housing and housing finance.

Having a criminal record, whether or not one was ultimately convicted, is a significant barrier to housing and housing finance. Expungement programs employ legal resources to clear past criminal records in certain circumstances. State law allows people found guilty of misdemeanors, except for some traffic violations including DUIs, to request expungement. Some felonies are eligible after five years. If a judge grants the request, the conviction will no longer appear on criminal background checks. In January 2012, the Steps Coalition, in collaboration with the Mississippi Center for Justice and Kingdom CDC, held an expungement clinic and in April 2013 Kingdom CDC and The Coalition of African American Communities and Churches sponsored another clinic. Both clinics

were held in Gulfport. Holding additional expungement clinics across the coast would allow more otherwise eligible people to access housing and housing finance opportunities.

GOAL 5: Improve existing and future neighborhoods to better connect housing with employment and other services

CURRENT STATUS:

An important part of housing is having access to employment, services, and other amenities such as parks and recreation. This access not only increases the functionality of housing, but also reduces the time and costs associated with extensive travel. Access is determined by where housing and services are located in relation to one another and also by the availability of different modes of transportation that serve as connections. Many of the more vulnerable populations are struggling to find housing that meets their needs and when they do it is often far from the services they need. In addition, people are increasingly living, working and playing at a regional scale, but jurisdictions on the coast are not yet working together to plan for regional growth.

OBJECTIVES:

- Improve regional collaboration around housing planning.
- Increase housing options near existing infrastructure, transportation, employment and services.
- Revitalize existing neighborhoods.
- Decrease barriers to accessing employment and key services.

INDICATORS:

- Revision of comprehensive plans to promote residential infill development and investment in existing neighborhoods.
- Increase in residential infill development.
- Increase in percent of employees living in-state and in the communities where they work.
- Decrease in households' combined housing and transportation costs.

RECOMMENDED STRATEGIES:

1. Conduct a job/housing balance analysis.

Having housing in close proximity to employment opportunities is a major component of decreasing households' combined housing and transportation costs. In order for this to work, however, the housing that is in close proximity to a given employment center needs to be affordable to the employees at that center. This is especially a concern on the Mississippi Gulf Coast because many of

the major employment centers are located close to the water where higher insurance costs often make housing more expensive. It would be very beneficial for the region to do a job and housing balance analysis that looks at jobs by wage type (low-wage, moderate-wage, high-wage) and the number of housing units by cost type (low-cost, moderate-cost, high-cost). A study of this type would help the region identify any imbalances and further refine solutions aimed at making housing more affordable to residents. An example of a thorough job and housing balance analysis can be found in the Southeastern Wisconsin Regional Housing Plan: 2035.^{xi}

2. Promote uniformity in zoning codes for jurisdictions in the region.

Jurisdictions in the Mississippi Gulf Coast region have traditionally operated autonomously in regards to planning and zoning and, as a result, many of the zoning ordinances contain definitions and land use classifications that are different from one another. This makes analysis and planning at a regional scale much more difficult. As jurisdictions revise their zoning codes they are strongly encouraged to more closely align their definitions and land use classifications. The Gulf Regional Planning Commission works with all the jurisdictions to some level on their planning and would be well suited to help the various jurisdictions across the coast with this task.

3. Encourage jurisdictions to promote infill and investment in revitalizing existing neighborhoods in comprehensive plans.

Comprehensive plans are an important mechanism for jurisdictions to set priorities and envision their future. As such, it is important that the jurisdictions in the region work to align certain key aspects of their comprehensive plans with the overarching goals of the region as established in the *Plan for Opportunity*. The *Plan for Opportunity*'s report, *Assessing Gulf Coast Comprehensive Plans on Regional Livability*, notes that the jurisdictions on the coast can do more to promote infill development and investment in existing communities. The report highlights Gautier as a good example of promoting infill and investment in existing neighborhoods and even goes so far as to identify key areas for infill development. Jurisdictions are encouraged to review their comprehensive and specialized plans and to consider making revisions to promote infill development and investment in existing communities.

4. Encourage jurisdictions to offer incentives to developers locate a mix of residential development near existing infrastructure, transportation, employment and services.

In addition to promoting infill and investment in existing neighborhoods in comprehensive plans, jurisdictions are encouraged to identify key areas for infill and investment and consider offering development incentives to builders who choose to build in these areas. Development incentives can range from reductions in taxes and fees to leniency in density, parking or setback requirements. Jurisdictions are encouraged to devise a set of development incentives that make the most sense for their community.

5. Advocate for Mississippi Home Corporation's (MHC) Qualified Allocation Plan (QAP) and Notifications of Funding Availability (NOFA) for HOME funds to incentivize infill development.

As previously mentioned, the Mississippi Home Corporation (MHC) and the Gulfport-Biloxi-Harrison County HOME Consortium both administer housing funding and are required to establish means of consistently evaluating proposed projects. In both cases points are awarded based on certain criteria and priorities. MHC, the Gulfport-Biloxi-Harrison County HOME Consortium, and other housing fund administering agencies should consider awarding additional points for infill development and projects that invest in existing neighborhoods.

6. Work with major employers in the region to encourage employees to live in-state and closer to work.

Several of the region's major employment centers are located on the borders between Mississippi and Louisiana and Mississippi and Alabama. A significant number of employees at these centers are choosing to live out of state. Major employers in the region should be encouraging their employees to live in-state and closer to work. One strategy is to develop a relocation package for use by the employers' human resources departments. As part of Hancock Tomorrow, Hancock County's economic development strategy, a relocations package is being created to highlight housing, education, recreation and cultural opportunities in Hancock County. The materials will be distributed to major employers in the county such as Stennis and Port Bienville, as well as to real estate agencies. This might be a model for other jurisdictions in the region that are losing potential residents to neighboring states.

7. Consider implementing a housing incentive program with employers and including a rent subsidy component.

The Gulf Coast Renaissance Corporation previously administered a program called REACH that assisted employers with developing an Employer Assisted Housing (EAH) and provided financing for qualified employees to offset the costs of purchasing a home close to work. This program was discontinued in 2010. While aspects of the program might need to be reconsidered, the overall concept has great potential for incentivizing residents to live closer to work and reducing households' combined housing and transportation costs. It is recommended that GCRC, in collaboration with a regional housing coalition, consider developing a housing incentive program with major employers in the region.

8. Encourage county boards of supervisors to contract with the Coast Transit Authority to provide senior demand-response transportation.

Many of the regions' seniors live in the counties or in other areas not currently serviced by public transportation. While most of the senior centers do offer transportation services, they are somewhat limited and may not meet the needs of many seniors. Currently, the Harrison County Board of Supervisors contracts with the Coast Transit Authority (CTA) to provide demand-response

transportation free to seniors in Harrison County. Other boards of supervisors are encouraged to work with CTA to provide this very necessary service.

9. Consider Paratransit service to bridge gap between assisted housing developments and existing public transit network.

Currently, only 28 out of the 78 assisted housing developments on the coast are within ¼ mile of public transit. These lower income, working households are often most in need of reliable access to transportation services. While it is not realistic to be able to extend the current public transit routes to include these developments, there is an opportunity to utilize paratransit services to bridge the gap between assisted housing developments and the existing public transit network. Paratransit is an alternative mode of flexible passenger transportation that does not follow fixed routes or schedules. Typically minibuses are used to provide paratransit service, but share taxis and jitneys are also used. Paratransit services may vary considerably on the degree of flexibility they provide their customers and may run on a more or less defined route and schedule or offer fully demand responsive transportation. Paratransit services are operated by public transit agencies, community groups or not-for-profit organizations, and for-profit private companies or operators.

STRATEGY AND IMPLEMENTER

FUNDING SOURCE

Establishing a foundation for regional housing planning

Establish a regional housing coalition.

LEAD IMPLEMENTER: Gulf Coast Community Design Studio, Gulf Regional Planning Commission, Southern Mississippi Planning and Development District, Cities, Counties, and members of the *Plan for Opportunity* Housing Subcommittee

While some organizational costs may be incurred, these should be paid for as part of the organizations' and jurisdictions' normal administrative procedures. Should the coalition decide to apply for nonprofit status, access to grants will provide more funding opportunities.

Establish a regional housing trust fund.

LEAD IMPLEMENTER:
Gulf Coast Renaissance Corporation (GCRC) and the Mississippi Gulf Coast Housing Coalition

Initial costs would be paid for as part of GCRC and partner organizations' normal administrative procedures. Funding sources such as CDBG funds, general funds, developer fees, taxes, loan repayment fees, etc., would need to be agreed upon and designated through enabling legislation.

More Information:

<http://housingtrustfundproject.org/>

Continue to look at housing regionally through a Fair Housing and Equity Assessment or Regional Analysis of Impediments.

<p>LEAD IMPLEMENTER: Mississippi Gulf Coast Housing Coalition. The Gulf Coast Community Design Studio (GCCDS) conducted the <i>Plan for Opportunity's</i> FHEA and would be available to assist with or to conduct future assessments.</p>	<p>Funding could be set aside in each of the jurisdiction's budgets or become a component of the MS Gulf Coast Housing Trust Fund.</p>
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GOAL 1: Improve the resiliency and building performance of the housing stock on the coast

Create a central location where residents and community leaders can learn more about the challenges and opportunities around elevated housing.

<p>LEAD IMPLEMENTER: Gulf Coast Community Design Studio (GCCDS)</p>	<p>Potential funding sources include: Federal Emergency Management Agency (FEMA), Mississippi Emergency Management Agency (MEMA), and Mississippi-Alabama Sea Grant Consortium.</p>
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Promote awareness of programs to rehabilitate and retrofit existing houses.

<p>LEAD IMPLEMENTER: Gulf Coast Community Design Studio, Smart Home America, Existing program administration agencies, housing and housing service providers, insurance agents, cities and counties.</p>	<p>While some organizational costs may be incurred, these should be paid for as part of the organizations' and jurisdictions' normal administrative procedures.</p>
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Fund cost/benefit analysis of housing retrofits to support existing and future retrofit and rehabilitation programs.

<p>LEAD IMPLEMENTER: Southern Mississippi Planning and Development District (SMPDD), Gulf Coast Renaissance Corporation (GCRC) and the Gulf Coast Community Design Studio (GCCDS)</p>	<p>The Mississippi-Alabama Sea Grant Consortium and the McArthur Foundation have offered funding to similar projects. Other potential funding sources include the Federal Emergency Management Agency (FEMA), Mississippi Emergency Management Agency (MEMA), and the Insurance Services Office (ISO)</p>
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Encourage jurisdictions to look at their inventory of rental housing stock, identify type(s) most in need of repair, and create a plan to address concerns.

<p>LEAD IMPLEMENTER: Cities and counties</p>	<p>While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.</p>
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Establish a regional housing trust fund program to help improve the building performance of existing homes.

<p>LEAD IMPLEMENTER: Board of Directors of the Mississippi Gulf Coast Housing Trust Fund, Gulf Coast Renaissance Corporation (GCRC) and the Mississippi Gulf Coast Housing Coalition</p>	<p>Funding sources such as CDBG funds, general funds, developer fees, taxes, loan repayment fees, etc., would need to be agreed upon and designated through enabling legislation.</p>
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Advocate for expansion of Mississippi Department of Health and Human Services' Weatherization Assistance Program (WAP) to include multifamily properties and encourage power companies to create multifamily

energy efficiency retrofit and/or rebate programs.

LEAD IMPLEMENTER: Mississippi Department of Health and Human Services and local power companies

Some organizational costs may be incurred and should be paid for as part of the agency's and companies' normal administrative procedures. Funding for additional programs through the power companies should be set aside in the companies' annual budgets, but may potentially be supplemented through the Department of Energy or other energy efficiency service providers.

More Information and Case Studies:

http://portal.hud.gov/hudportal/documents/huddoc?id=factsheet_doe_weatherize_3.pdf

<http://www.masssave.com/business/multi-family-facilities>

<http://www.sdge.com/more-savings-multi-family>

Educate residents and property owners on strategies for reducing insurance costs.

LEAD IMPLEMENTER: Gulf Coast Community Design Studio, Insurance agents and professional organizations, Smart Home America, Institute for Business and Home Safety (IBHS), and housing and housing related service organizations.

While some organizational costs may be incurred around information gathering and promotion, these should be paid for as part of the organizations' normal administrative procedures.

Encourage collaboration and information sharing between insurance companies, building code officials, city councils, boards of supervisors, code enforcement court officials and contractors on the importance of building to stronger standards and improving uniformity in code enforcement across the coast.

LEAD IMPLEMENTER: Coastal Hazard Outreach Strategy Team (C-HOST)

While some organizational costs may be incurred, these should be paid for as part of the organization's and jurisdictions' normal administrative procedures.

Work with jurisdictions to join the Community Rating System (CRS) program and/or improve their CRS rating.

LEAD IMPLEMENTER: Coastal Hazard Outreach Strategy Team (C-HOST), Mississippi-Alabama Sea Grant Consortium (MASGC), and Southern Mississippi Planning and Development District (SMPDD)

Potential funding sources: Federal Emergency Management Agency (FEMA), Mississippi Emergency Management Agency (MEMA), the Insurance Services Office (ISO), Mississippi Department of Marine Resources (MDMR), and Mississippi-Alabama Sea Grant Consortium (MASGC)

More Information:

<http://www.fema.gov/national-flood-insurance-program/national-flood-insurance-program-community-rating-system>

Promote awareness of indoor air quality.

LEAD IMPLEMENTER: Energy efficiency retrofit program administrators, jurisdictions' building code departments, builders, Gulf Coast Community Design Studio (GCCDS), Mississippi Department of Environmental Quality (MDEQ), Mississippi State University Extension Service, and other housing providers such as Habitat for Humanity

While some organizational costs may be incurred, these should be paid for as part of the organization's and jurisdictions' normal administrative procedures. Indoor Air Quality publications can be ordered from the U.S. Environmental Protection Agency's (EPA) National Service Center for Environmental Publications

More Information:

http://www.epa.gov/iaq/pdfs/building_codes_and_iaq.pdf

<http://www.epa.gov/iaq/pubs/>

Encourage jurisdictions to offer development incentives for developers who employ best practices in regards to indoor air quality.

LEAD IMPLEMENTER: Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

More Information:

http://www.epa.gov/iaq/pdfs/building_codes_and_iaq.pdf

GOAL 2: Improve compliance with Fair Housing Law and increase access to fair housing

Encourage jurisdictions to review the definition of "family" in their zoning code and amend zoning ordinances to include a more inclusive definition.

LEAD IMPLEMENTER: Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Encourage jurisdictions to review their policies in regards to group homes, revise their zoning ordinance to comply with fair housing law, and allow group homes in residential zones.

LEAD IMPLEMENTER: Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Promote principals and best practices for affirmatively furthering fair housing through training and education at the Mississippi Chapter of the American Planners Association (APA MS), Mississippi Coast Building Officials Association (MCBOA) and Mississippi Municipal League (MML) events.

LEAD IMPLEMENTER: University of Southern Mississippi's Institute for Disability Studies (IDS), Mississippi Center for Justice, Mississippi Chapter of the American Planners Association (APA MS), Mississippi Coast Building Officials Association (MCBOA), and Mississippi Municipal League (MML)

While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures. Additional training resources and funding may be available through the National Fair Housing Alliance (NFHA) and/or the National Housing Resource Center (NHRC)

Advocate for the establishment of a permanent HUD and state recognized fair housing organization to serve the needs of the region.

LEAD IMPLEMENTER: Mississippi Gulf Coast

Initial efforts toward passage of enabling legislation

Housing Coalition, Mississippi Center for Justice (MCJ)	would need to be paid for as part of the organizations' and jurisdictions' normal administrative procedures. Federal funding such as HUD's Fair Housing Initiative Program (FHIP) grants are available to fund organizations doing fair housing work, enforcement and testing. There are also numerous private funding options such as the National Fair Housing Alliance (NFHA), which provides support for fair housing work and/or operating membership of NFHA.
<p>Fund accessibility audit to determine compliance with the Fair Housing Amendments Act (FHAA) and Section 504 building standards.</p> <p>LEAD IMPLEMENTER: University of Southern Mississippi's Institute for Disability Studies (IDS), Mississippi Center for Justice, and/or Mississippi Gulf Coast Housing Coalition</p>	<p>Federal funding such as HUD's Fair Housing Initiative Program (FHIP) grants are available to fund organizations doing fair housing work, enforcement and testing. There are also numerous private funding options such as the National Fair Housing Alliance (NFHA), which provides support for fair housing work and/or operating membership of NFHA.</p>
<p>Encourage partnership between existing disability rights organizations, jurisdiction leaders and building code departments to ensure code enforcement.</p> <p>LEAD IMPLEMENTER: Cities, counties and existing disability rights organizations including Disability Rights Mississippi, Disability Connection, The ARC of Mississippi, and L.I.F.E. Mississippi.</p>	<p>While some organizational costs may be incurred, these should be paid for as part of the organizations' and jurisdictions' normal administrative procedures.</p>
<p>Establish a regional housing trust fund program to help remove barriers to accessibility for persons with disabilities.</p> <p>LEAD IMPLEMENTER: Board of Directors of the Mississippi Gulf Coast Housing Trust Fund, Gulf Coast Renaissance Corporation (GCRC) and the Mississippi Gulf Coast Housing Coalition</p>	<p>Funding sources such as CDBG funds, general funds, developer fees, taxes, loan repayment fees, etc. would need to be agreed upon and designated through enabling legislation.</p>
<p>Encourage recipients of Housing Choice Vouchers to locate in areas of higher opportunity and outside areas of concentrated poverty.</p> <p>LEAD IMPLEMENTER: Housing Choice Voucher administering agencies</p>	<p>While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.</p>
<p>Consider instating a regional housing mobility program targeted at the most segregated communities as identified in the FHEA.</p> <p>LEAD IMPLEMENTER: Mississippi Gulf Coast Housing Coalition</p>	<p>Initial efforts would need to be paid for as part of the organizations' and jurisdictions' normal administrative procedures. Potential funding sources for housing mobility programs include Community Development Block Grants, Fair Housing Assistance</p>

Program (FHAP), Fair Housing Initiatives Program (FHIP), HUD Housing Counseling Program, Moving to Work (MTW), and various private foundations.

More Information:

http://prrac.org/full_text.php?item_id=13718&newsletter_id=0&header=Current%20ProjectsEx

GOAL 3: Increase diversity of housing stock on the coast and improve access to affordable housing options

Encourage jurisdictions to amend or remove minimum floor area requirements for single family homes especially in developable areas near transportation and services.

LEAD IMPLEMENTER: Gulf Regional Planning Commission (GRPC), Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Educate jurisdictions, residents and developers on alternative housing options.

LEAD IMPLEMENTER: Gulf Coast Community Design Studio (GCCDS) and the Mississippi Gulf Coast Housing Coalition

Efforts would most likely need to be paid for as part of the organizations' normal administrative procedures.

Encourage amendments to zoning ordinances that allow for a mix of housing types near existing infrastructure, transportation, employment and services.

LEAD IMPLEMENTER: Cities and counties with assistance from the Gulf Regional Planning Commission (GRPC)

While some organizational costs may be incurred, these should be paid for as part of the organizations' and jurisdictions' normal administrative procedures.

Encourage jurisdictions to promote housing diversity in comprehensive plans.

LEAD IMPLEMENTER: Gulf Regional Planning Commission (GRPC), Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Encourage education and outreach through existing senior centers and service organizations to assist seniors in planning for their current and future housing needs.

LEAD IMPLEMENTER: Southern Mississippi Planning and Development District - Area Agency on Aging (AAA), Senior centers such as the Hancock Senior Center, Donal Snyder Community Center and Jackson County Civic Action Center

While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.

Encourage jurisdictions to offer incentives to developers to use universal design principles and to build housing for seniors and persons with disabilities in areas of high opportunity.

LEAD IMPLEMENTER: Cities and counties

While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Advocate for the incorporation of more universal design principals in Mississippi Home Corporation's

(MHC) Qualified Allocation Plan (QAP) and Notifications of Funding Availability (NOFA) for HOME funds.

LEAD IMPLEMENTER: Mississippi Home Corporation (MHC), the Gulfport-Biloxi-Harrison County HOME Consortium, and other housing fund administering agencies

While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.

Introduce state legislation to reduce the age a person is allowed to enter into a legal contract in Mississippi from 21 to 18 in compliance with federal standards.

LEAD IMPLEMENTER: Mississippi Center for Justice and/or the Mississippi Gulf Coast Housing Coalition

Efforts would most likely need to be paid for as part of the organizations' normal administrative procedures.

Establish a regional housing trust fund program to subsidize transitional housing and permanent supportive housing for the homeless.

LEAD IMPLEMENTER: Board of Directors of the Mississippi Gulf Coast Housing Trust Fund, Gulf Coast Renaissance Corporation (GCRC) and the Mississippi Gulf Coast Housing Coalition

Funding sources such as CDBG funds, general funds, developer fees, taxes, loan repayment fees, etc., would need to be agreed upon and designated through enabling legislation.

More Information & Case Studies:
<http://www.archhousing.org/developers/housing-trust-fund.html>

Continue to work with Federal agencies and Congress to increase funding levels for additional housing vouchers to help meet the demand for housing assistance in the Region.

LEAD IMPLEMENTER: Public housing authorities, the Mississippi Gulf Coast Housing Coalition, cities and counties

While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.

GOAL 4: Improve financial literacy and increase access to housing finance

Encourage collaboration between housing resource centers and workforce and economic development agencies.

LEAD IMPLEMENTER: Southern Mississippi Planning and Development District (SMPDD), Gulf Coast Community Design Studio (GCCDS), and organizations represented on the Housing and Economic/ Workforce Development Subcommittees for the *Plan for Opportunity*

While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.

Advocate for funding to promote awareness of existing financial literacy programs.

LEAD IMPLEMENTER: Mercy Housing and Human Development (MHHD)

Encourage partnerships and information sharing between housing nonprofits, financial institutions, employers and local cultural centers such as churches to increase awareness of existing financial literacy programs and housing finance opportunities.

LEAD IMPLEMENTER: Mercy Housing and Human Development (MHHD), Housing nonprofits, financial institutions, employers and local cultural centers	While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.
Advocate for funding to promote awareness of existing financial literacy programs and housing finance opportunities.	
LEAD IMPLEMENTER: Mercy Housing and Human Development (MHHD), Financial literacy program administrators and housing financing agencies	Some program funds may be redistributed to marketing and/or additional funds may be sought from the program funder(s). In addition, the National Financial Educators Council (NFEC) publicizes funding opportunities for financial education endeavors and might be a resource for obtaining funding.
Conduct research to identify and address the attitudinal and behavioral barriers to improved financial literacy.	
LEAD IMPLEMENTER: Mercy Housing and Human Development (MHHD), Southern Mississippi Planning and Development District (SMPDD) or Gulf Coast Renaissance Corporation (GCRC) with assistance from housing, economic and workforce development, and advocacy agencies	The National Financial Educators Council (NFEC) publicizes funding opportunities for financial education endeavors and might be a resource for obtaining funding.
Advocate for more programs addressing remediation of past criminal records as a means of removing barriers to housing and housing finance.	
LEAD IMPLEMENTER: Steps Coalition, Mississippi Center for Justice (MCJ) and housing organizations	Efforts would most likely need to be paid for as part of the organizations' normal administrative procedures and/or sponsored by a private entity.
GOAL 5: Improve existing and future neighborhoods to better connect housing with employment and other services	
Conduct a job/housing balance analysis.	
LEAD IMPLEMENTER: Southern Mississippi Planning and Development District (SMPDD) in collaboration with the Mississippi Gulf Coast Housing Coalition	Efforts would most likely need to be paid for as part of the organizations' normal administrative procedures or paid for as part of the next Fair Housing and Equity Assessment or Regional Analysis of Impediments as recommended on page two of this report.
	More Information: http://www.sewrpc.org/SEWRPC/Housing/TheJobsHousingBalance.htm
Promote uniformity in zoning codes for jurisdictions in the region.	
LEAD IMPLEMENTER: Cities and counties with assistance from the Gulf Regional Planning Commission (GRPC)	While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.

Encourage jurisdictions to promote infill and investment in revitalizing existing neighborhoods in comprehensive plans.	
LEAD IMPLEMENTER: Cities and counties	While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.
Encourage jurisdictions to offer incentives to developers locate a mix of residential development near existing infrastructure, transportation, employment and services.	
LEAD IMPLEMENTER: Cities and counties	While some organizational costs may be incurred, these should be paid for as part of the jurisdictions' normal administrative procedures.
Advocate for Mississippi Home Corporation's (MHC) Qualified Allocation Plan (QAP) and Notifications of Funding Availability (NOFA) for HOME funds to incentivize infill development.	
LEAD IMPLEMENTER: Mississippi Home Corporation (MHC), the Gulfport-Biloxi-Harrison County HOME Consortium, and other housing fund administering agencies	While some organizational costs may be incurred, these should be paid for as part of the organizations' normal administrative procedures.
Work with major employers in the region to encourage employees to live in state and closer to work.	
LEAD IMPLEMENTER: Chambers of commerce, development commissions, cities and counties.	Efforts would most likely need to be paid for as part of the organizations' normal administrative procedures and/or sponsored by a private entity.
Consider implementing a housing incentive program with employers and including a rent subsidy component.	
LEAD IMPLEMENTER: Gulf Coast Renaissance Corporation (GCRC) in collaboration with the Mississippi Gulf Coast Housing Coalition	If development of the program is decided to be a worthwhile endeavor, the Gulf Coast Renaissance Corporation would likely determine appropriate funding sources.
Encourage county boards of supervisors to contract with the Coast Transit Authority to provide senior demand-response transportation.	
LEAD IMPLEMENTER: County boards of supervisors and the Coast Transit Authority (CTA)	Funding would primarily come from the participating counties' budgets, though may be subsidized through the Coast Transit Authority (CTA)
Consider Paratransit service to bridge gap between assisted housing developments and existing public transit network.	
LEAD IMPLEMENTER: Coast Transit Authority (CTA) with planning assistance from the Gulf Regional Planning Commission	Funding could come from a combination of sources including the Coast Transit Authority (CTA), cities, counties, assisted housing developments and the Mississippi Department of Health and Human Services.

Notes:

ⁱ It is difficult to quantitatively assess how well codes are implemented and enforced by local communities. One indication of this stems from evaluations of these functions at the community level as a way of managing risks, particularly risk of losses from natural disasters. One company that provides these evaluation services has published the results from the evaluations it has performed throughout the country. The company, ISO, uses its Building Code Effectiveness Grading Schedule (BCEGS®) to perform this function. Communities get rated on a 10 point scale with 1 representing exemplary administration and enforcement of the code, and 10 representing little or no quality administration and enforcement.

ⁱⁱ U.S. Department of Housing and Urban Development and U.S. Department of Energy Weatherization Partnership. Streamlining Weatherization Assistance in Affordable Housing. Updated 5 March 2010.

<http://portal.hud.gov/hudportal/documents/huddoc?id=factsheet_doe_weatherize_3.pdf>.

ⁱⁱⁱ Federal Emergency Management Agency. (2011). National Flood Insurance Program. Flood Insurance Manual. Chapter 19. Community Rating System. Page 1.

^{iv} Mudarri, David H. and The Camus Group. Prepared for the U.S. Environmental Protection Agency, Office of Radiation and Indoor Air, Indoor Environments Division. September 2010. Building Codes and Indoor Air Quality. <http://www.epa.gov/iaq/pdfs/building_codes_and_iaq.pdf>. Page 7.

^v Mudarri, David H. and The Camus Group. Prepared for the U.S. Environmental Protection Agency, Office of Radiation and Indoor Air, Indoor Environments Division. September 2010. Building Codes and Indoor Air Quality. <http://www.epa.gov/iaq/pdfs/building_codes_and_iaq.pdf>. Page 16.

^{vi} Western Economic Services, LLC. (2008). The 2008 Mississippi Analysis of Impediments to Fair Housing Choice. Prepared for MDA. November 2008. Page 77.

^{vii} Gulf Coast Fair Housing Center. (2004). Rental Housing Accessibility Audit. Gulfport, MS. Page 8.

^{viii} Ibid. Page 9.

^{ix} U.S. Department of Housing and Urban Development. Accessibility Requirements for Buildings. <http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/accessibility>.

^x U.S. Treasury Department and the Organization for Economic Cooperation and Development (OECD). Taking Financial Literacy to the Next Level: Important Challenges and Promising Solutions. 7-8 May 2008. <<http://www.oecd.org/finance/financial-education/41635334.pdf>>. Pages 16-21.

^{xi} Southeastern Wisconsin Regional Planning Commission. SEWRPC Planning Report No. 54: A Regional Housing Plan for Southeastern Wisconsin: 2035. <<http://www.sewrpc.org/SEWRPCFiles/HousingPlan/Files/DraftChapters/pr-54-chapter-08-draft.pdf>>.