

Executive Summary

The City of Annapolis, Maryland is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." To "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis, which identifies any impediments to fair housing choice.

The City of Annapolis prepared an Analysis of Impediments to Fair Housing Choice in 2006. The City has now prepared this FY 2015-2019 Analysis of Impediments to Fair Housing Choice. The analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The methodology employed to undertake this Analysis of Impediments included:

- **Research:**
 - A review of the City's Zoning Ordinance, Comprehensive Plan, land use policies and procedures was undertaken
 - Demographic data for the City was analyzed from the U.S. Census and the HUD-CHAS data and tables
 - A review of the real estate and mortgage practices was undertaken
- **Interviews & Meetings:**
 - Meetings and/or interviews were conducted with the City and County Department heads, community and social service/advocacy agencies, housing providers, and real estate firms

- **Analysis of Data:**
 - Low- and moderate-income areas were identified
 - Concentrations of minority populations were identified
 - Fair housing awareness in the community was evaluated

- **Potential Impediments:**
 - Public sector policies that may be viewed as impediments were analyzed
 - Private sector policies that may be viewed as impediments were analyzed

The City of Annapolis's FY 2016-2020 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with the goals and strategies to address those impediments.

Impediment 1: FAIR HOUSING EDUCATION AND OUTREACH – There is a need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households, that all residents of the City have a right under federal law to fair housing choice.

Goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.

In order to meet this goal, the following activities and strategies should be undertaken:

1-A: Continue to promote Fair Housing awareness through the media and with assistance from local/regional social service agencies, by providing educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans with Disabilities Act.

1-B: Continue to make available and distribute literature and informational material, in English and Spanish, concerning fair housing issues, an individual's rights, and landlord's responsibilities to affirmatively further fair housing.

1-C: Improve the information on the City's website about whom to contact and how to file a fair housing complaint, as well as general Fair Housing information for homeowners and renters.

1-D: Strive for better intergovernmental cooperation between Federal, State, County, and local partners, as well as community groups and developers, to effectively identify and address potential barriers to affordable housing choice.

1-E: Continue to support the efforts of the City's Human Relations Commission.

Impediment 2: PUBLIC POLICIES AND REGULATIONS – The City’s Zoning Code needs additional definitions, provisions, and revisions to be compliant with the Federal Fair Housing Act, Section 504, and the Americans with Disabilities Act to affirmatively further fair housing.

Goal: Revise the City Zoning Code to affirmatively further fair housing.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

2-A: The Planning and Zoning Department should review the existing ordinances and zoning regulations for compliance with the Fair Housing Act, as amended.

2-B: Revise the definitions and add new definitions for the words: “Family,” Handicap (Disabled),” “Fair Housing Act,” “Accessibility,” “Visitability,” etc.

Impediment 3: CONTINUING NEED FOR AFFORDABLE AND ACCESSIBLE HOUSING UNITS – The cost of rent for apartments in the City has increased over the past ten years to the point that 50.6% of all renter households in Annapolis are paying more than 30% of their monthly incomes on the cost of their housing, which means that these households are considered cost overburdened.

Goal: Promote and encourage the construction and development of additional affordable rental housing units in the area, especially for households whose income is less than 80% of the median income.

In order to meet this goal, the following activities and strategies should be undertaken:

3-A: Support and encourage both private developers and non-profit housing providers to develop plans for the construction of new affordable and accessible renter occupied and owner occupied housing that would be located in areas that provide access to employment opportunities, transportation, amenities, and services throughout the Region.

3-B: Support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter occupied and owner occupied housing that is affordable and accessible to lower income households.

3-C: The Housing Authority of the City of Annapolis should partner with private and non-profit housing developers to continue to construct affordable rental housing utilizing Low Income Housing Tax Credits (LIHTC) and other financing tools through federal, state, and local units of government.

3-D: Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants who are disabled, as well as educating the disabled how to request special accommodations.

Impediment 4: PRIVATE LENDING AND INSURANCE PRACTICES – The Home Mortgage Disclosure Act (HMDA) data suggests that there is a disparity between the approval rates of home mortgage loans originated from White and those originated from Minority applicants.

Goal: Approval rates for all originated home mortgage loans and insurance coverage should be fair, risk based, unbiased, and impartial, regardless of race, familial status and location.

In order to meet this goal, the following activities and strategies should be undertaken:

4-A: Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas.