



Analysis of Impediments to Fair Housing Choice

2022

THE CITY OF
NORFOLK

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I. Executive Summary

The City of Norfolk in 2021 consolidated several programs and initiatives under one new department, the Norfolk Department of Housing and Community Development (NDHCD). NDHCD leadership began the process of developing an Analysis of Impediments to Fair Housing Choice (AI) survey and report to update the 2011 report; document progress over the past decade; and chart a strategic direction for the next five years. An AI is required by the Department of Housing and Urban Development (HUD) for recipients of HUD funding as part of their efforts to affirmatively further fair housing choice under the Fair Housing Act.

The AI provides a guide to publicly available quantitative data for Norfolk over time as well as in comparison to the Hampton Roads region and the Commonwealth of Virginia. Norfolk's assessment team also conducted stakeholder interviews and a public survey to add qualitative data to the analysis. The assessment team used the results of the quantitative and qualitative analysis to identify impediments to fair housing choice as defined by HUD and recommend actions that NDHCD, other City departments, and public agencies may take over the next five years to address the impediments.

A. Summary of Assessment

The following section provides key data points and insights from each of the sections of the report. Additionally, most sections highlight specific actions the City of Norfolk has taken within each topic area. Each point is more thoroughly explained and placed in context within the referenced section. The reader is encouraged to treat this summary section as a guide and high-level overview of the Norfolk 2022 Analysis of Impediments to Fair Housing Choice report.

i. Introduction

This chapter provides an overview of HUD requirements pertaining to the responsibilities of HUD funding recipients to conduct an Analysis of Impediments to Fair Housing Choice, as well as a summary of key concepts and definitions discussed throughout the document.

ii. Community Participation

This chapter discusses the process and insights from community engagement for the analysis, which included stakeholder interviews, a community survey campaign, and a public meeting.

Community engagement was pursued through three distinct methods which included:

- Stakeholder interviews - Between February and March 2022, 23 interviews representing 21 organizations were recorded to augment the information for this report.
- Public Survey - The City hosted a public survey from March 7, 2022, until March 21, 2022, that was publicly available online and physical survey copies could be submitted to NDHCD. A total of 415 responses were recorded.

- Public Meeting – The City hosted a public meeting to discuss the process and insights of the Analysis of Impediments to Fair Housing on August 4, 2022. Norfolk residents attended in person and virtually.

iii. Socioeconomic Profile

This chapter describes the socioeconomic patterns and trends within Norfolk over time and compared to the region. An analysis of demographic and economic data provides insight into trends and patterns that may impact housing choice and provides an overview of the characteristics of protected classes and patterns of segregation.

Key Data and Insights:

- While the 65 and older population of Norfolk is only 12 percent of the total population, it is the age group experiencing the fastest growth rate in Norfolk. (IV.A.ii)
- Thirty-eight percent of Norfolk seniors have disabilities, which includes ambulatory difficulties. (IV.A.vi)
- Norfolk's population is stable, unlike the region and state. At the same time, there have been changes in the racial makeup of the city. Both Norfolk's White and Black or African American populations are decreasing while Norfolk's Hispanic population is increasing. (IV.A.iv)
- Norfolk has a higher percentage of "non-family" households than the region and state.¹ (IV.A.v)
- There is significant income inequality in terms of both median income by race and percent of residents living below poverty level in Norfolk. (IV.B.i)

iv. Housing Profile

This chapter provides an overview of selected housing trends for Norfolk. The analysis examines housing diversity, housing development and construction, housing affordability, evictions, other data related to housing affordability and access, and potential fair housing barriers.

Key Data and Insights:

- Norfolk's housing stock is more diverse than the state, however, much of the missing middle housing stock is declining and being replaced by predominantly large apartment buildings and single-family housing. (V.B)

¹ "Non-family households are defined by the US Census as "a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related."

<https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html>

- Just under 41 percent of renters in Norfolk are housing cost burdened, paying 30 percent or more of their income for monthly housing costs. Black or African American households are most likely to be significantly housing cost-burdened in Norfolk. (V.H)
- Norfolk has one of the highest eviction rates in the country and stakeholders worry that the pandemic likely exacerbated the impacts of the eviction crisis. (V.J)
- Racial disparities exist in foreclosed housing in Norfolk with the majority of foreclosures occurring in majority Black census tracts. A New America study found that foreclosures in Norfolk most often happen in neighborhoods with more single parent households and more reliance on public transit. (V.I)
- Norfolk has an aging housing stock with 50.6 percent of housing built before 1959. This poses a greater need to tackle challenges related to housing repair, weatherization, health issues, and lead paint remediation. (V.A.ii)
- The Comprehensive Plan mostly requires apartments to be built on collector or arterial roads. Yet, pollution from areas with high volumes of traffic may exacerbate exposure to air pollution so placing apartments on arterials can put renters at greater risk of health and safety problems. While not uncommon across the US, policies that concentrate housing in polluted areas should be examined. (V.B)
- Norfolk's housing stock is generally growing based on a review of building permits over time. At the same time, stakeholders indicated during interviews that the housing market is extremely competitive among buyers and renters with multiple tenant applications for every unit. If true, this competition for rental housing could pose a barrier for all renters, but particularly those with housing choice vouchers. (X.D.i)
- Norfolk has a strong presence of military and veteran populations and accommodates five college campuses, all of which may draw more absentee landlords and large property management companies to the region. (VI.E)

City of Norfolk Actions:

- The Department of Neighborhood Services stood up the Norfolk Eviction Prevention Center to connect Norfolk residents facing eviction with funding and resources to mitigate immediate relief needs and stabilize households to reduce the risk in the long term. Resource clinics were held in December 2021 and May 2022. This effort was made possible with approximately \$1.3 million of state and local funding.
- As of February 2022, the Virginia Rent Relief Program distributed over \$48 Million in rent relief to more than 7,000 Norfolk households since launching in June 2020. It is designed to support and ensure housing stability across the commonwealth during the coronavirus pandemic.
- The City of Norfolk runs an owner-occupied rehabilitation program to provide financial assistance to low-income homeowners for necessary interior and exterior repairs. Properties are rehabilitated to provide safe and sanitary housing and/or improve accessibility for seniors or persons with mobility impairments. The goal of each

rehabilitation is to reduce ongoing and future maintenance costs and create decent, affordable housing for City of Norfolk residents.

- In July 2021, Norfolk City Council approved a Missing Middle Pattern Book to provide free designs for ‘middle housing’ including duplexes, quadplexes, and “Norfolk six-packs.” This plan book is designed to encourage more housing diversity, especially options that lie between single-family detached homes and large apartment buildings. Missing Middle Housing delivers multiple units on the same size lot as a single-family home, therefore allowing distribution of land costs across multiple units, making them inherently more affordable. Because the units are often smaller than conventional single-family housing, they are less expensive to build.

v. Populations with Special Needs

This chapter explores the specific housing needs of residents with special needs, many of whom may have a harder time finding, securing, or maintaining housing. The chapter seeks to understand the housing needs of these subpopulations to determine whether any specific fair housing trends or patterns are disproportionately affecting these communities.

Key Data and Insights:

- Norfolk is part of a Continuum of Care that includes Chesapeake, Franklin, Suffolk, Isle of Wight, and Southampton County. The January 27, 2021, point-in-time homeless count showed that there were 538 people in shelters, including 38 households with children under 18. There were also 26 people in transitional housing. One-third of all sheltered people were severely mentally ill, and one-fifth were veterans. (VI.A.ii)
- Veterans are 15.9 percent of Norfolk’s population and are more likely than the civilian population to have a disability. (VI.E)
- Based on our review, sufficient data is not collected about LGBTQ+ housing issues and LGBTQ+ identification. Despite this, Norfolk has available LGBTQ+ services and government representation. (VI.A.iii)
- Disability rates in Norfolk are highest amongst American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and Black or African American populations. People with disabilities have lower employment rates than people without disabilities. (VI.C.i)
- Based on publicly available data and stakeholder responses, there appears to be limited affordable, accessible housing in Norfolk—in terms of building accommodations, walkability, access to community amenities, and feelings of being “part of the neighborhood.”

City of Norfolk Actions:

- The City of Norfolk's FY 2023 Annual Plan includes funding for the rehabilitation of an apartment complex that provides housing to persons with physical disabilities and brain injuries, as well as seniors and veterans. This project will serve approximately 24 households.
- The Norfolk Community Services Board's Housing and Homeless Services unit has been providing shelter at a local hotel since March 2020 in response to the COVID-19 pandemic. Dubbed the "Safety Hotel," the operation serves about 80 of Norfolk's most vulnerable homeless population - those in the CDC group identified at high risk for severe illness within the unsheltered homeless community.
- In September 2021, the City of Norfolk purchased a motel to serve as the permanent location for its homeless shelter. The Norfolk Community Services Board now operates the 100-bed emergency shelter for single adults experiencing homelessness in Norfolk. In addition to providing year-round shelter beds, The Center provides day services to homeless individuals which include a midday meal, access to outreach and case management staff, assistance with navigating the housing process and linkage to benefits including SNAP (food stamps), health insurance, and more. The Center also serves as the City's overnight shelter response during severely cold weather (as declared by the Emergency Operations Center) with up to 50 additional overflow spots.

vi. Segregation and Integration

This chapter reviews the patterns of segregation and integration present in Norfolk, including historic patterns of housing segregation from redlining, urban renewal, and disparities in mortgage lending.

Key Data and Insights:

- In 2015, there were seven Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) in Norfolk, a decrease of 36 percent since 2010 when there were 11 R/ECAP areas. This indicates fewer concentrated areas of poverty that lack opportunities for communities of color living below the poverty threshold. (VII.A.i)
- Updated 2019 Norfolk R/ECAP data shows that the areas primarily comprise Black, Non-Hispanic persons, representing 72.1 percent of the R/ECAP population. Approximately 3,707 families reside within R/ECAP areas and 60.7 percent are families with children. (VII.A.ii)
- The 2020 dissimilarity indices show high segregation in Norfolk between White and all non-White racial and ethnic groups. This index has increased over the past decade. Segregation between White and Black populations is highest when compared to other racial and ethnic groups. (VII.B)

- Based on our comparison, many of the patterns of segregation today match historic redlining from as early as the 1930s. (VII.B.i)

City of Norfolk Actions:

- **Housing in areas of opportunity:** Research shows that individuals who live in high-poverty neighborhoods fare worse than those who live in lower-poverty neighborhoods on a wide range of economic, health and educational outcomes. Areas of opportunity are those that generally have low poverty rates and access to amenities like good schools, public transportation, and recreational opportunities. Through the Tidewater Gardens CNI transformation efforts, Norfolk has implemented a landlord incentive program for landlords who rent to residents in neighborhoods of opportunity. As a result of these efforts, 85% of residents who have transitioned out of Tidewater Gardens with a housing choice voucher have moved to neighborhoods with a poverty rate of less than 40% and 39% have moved to neighborhoods with a less than 20% poverty rate. Incentives include sign on bonuses, property inspection and repair funds, vacancy loss coverage, damage loss/risk mitigation funds, rental gap subsidy as well as case management and landlord support.
- **Deconcentrating poverty:** Based on the recommendations from the City's 2016 affordable housing study, a key affordable housing goal was to create new housing options for low-income residents in communities of opportunity and address obsolete public housing through the deconcentration of clusters of poverty. The study indicated that through the development of mixed-income neighborhoods, the City can support the deconcentration of poverty. Norfolk has taken steps to redevelop its public housing through the St. Paul's Transformation area. This phased transformation includes the redevelopment of the Tidewater Gardens public housing neighborhood into a mixed-income neighborhood that provides best in class amenities and housing for all income levels. Paired with a landlord outreach and a tenant mobility and human service program called People First, this redevelopment ensures that there is a right to return for public housing residents as well as a supportive service program that provides services to all residents in the areas of economic mobility, education, housing stability and health and wellness regardless of where they live. The City worked with residents to design the People First program and funds it at \$3M every year to support the families of Tidewater Gardens. Lessons learned from this effort will be used to determine if future neighborhoods could also benefit from People First.
- The creation of mixed-income housing expands the availability of quality affordable housing throughout Norfolk. Norfolk's design guidelines, adopted by City Council in 2020, expresses the City's desire to facilitate high quality multifamily development that provides a mix of type and cost of housing accommodation. Within the guidelines, it calls for mixed-income developments that support diverse residents, naturally creating mixed income communities. Since its adoption, 119 inclusionary units (rented at no

more than 80% of AMI) have been built in Norfolk within other private developments. This represents 10% of the total units built. Norfolk's St. Paul's Advisory Committee and the Mayor's Commission on Social Equity and Economic Opportunity have proposed an inclusionary housing policy currently under discussion by leadership.

vii. Access to Opportunity

This chapter provides an overview of federal and local data sources, as well as community stakeholder feedback, to examine access to opportunity for Norfolk residents who are members of protected classes. This chapter also discusses access to education, affordable transportation, employment opportunities, environmental health, housing quality, exposure to lead-based paint, and broadband access.

Key Data and Insights:

- While the minimum wage is \$11 per hour in Virginia, the “living wage” is almost double or more at almost every family configuration. (VIII.B.iii)
- Nine Norfolk public schools are currently identified for comprehensive or targeted improvement under the Every Student Succeeds Act (ESSA). Under ESSA, targeted improvement happens when certain subpopulations of students are underperforming while comprehensive improvement is for schools that are lower performing than the state. (VIII.B.v)
- Hispanic and Black students have a disproportionate rate of on-time graduation from high school and dropout rates compared to their White peers. (VIII.B.v)
- Similar to other major cities, Norfolk experiences relatively high levels of environmental contaminates. Norfolk's EPA region is in the 80th to 100th percentile for diesel particulates, air toxics cancer risk, and air toxics respiratory hazard index (HI).
- EPA data indicates that the majority of residential units in Norfolk have the potential for exposure to lead from pre-1978 housing units.
- In reviewing the local opportunity access data from HUD, we found that high-opportunity neighborhoods are often adjacent to low-opportunity neighborhoods. For example, unemployment rates in some neighborhoods range from roughly two percent next to other areas that reach 29.7 percent. While not necessarily indicative of employment opportunities available within neighborhoods, this data point could (VIII.B.i)

City of Norfolk Actions:

- The City's owner-occupied rehabilitation program addresses the issue of lead-based paint by incorporating education, reduction, and encapsulation for homes with identified lead hazards that are undergoing rehabilitation.

- In the FY 2023 budget, the City of Norfolk raised the minimum wage for City employees to \$18 for all full-time employees and \$15 for all part-time employees.
- In April 2022 the City of Norfolk and partnering cities broke ground on a 119-mile regional fiber ring, which will connect the cities of Virginia Beach, Norfolk, Chesapeake, Portsmouth, and Suffolk, and make high-speed, reliable internet available to all.

viii. Homeownership and Lending

This chapter provides an overview of data related to home loans, primarily sourced from Home Mortgage Disclosure Act (HMDA) public data. The data covers loan types as well as origination and denial rates across protected classes in Norfolk and discusses potential indicators of bias or discrimination.

Key Data and Insights:

- White applicants accounted for 69% of all loan activity in 2020 yet White residents only represent 41% of the population of Norfolk. (IX.B)
- Loan denial rates are significantly higher for communities of color, regardless of income. (IX.C.ii)
- Discrepancies in the home lending market have not significantly improved for communities of color in Norfolk since the 2011 report data.

City of Norfolk Actions:

- Each year, the City of Norfolk provides approximately \$1 million to the Norfolk Redevelopment and Housing Authority's (NHRA's) HomeNet Homeownership Center to expand the supply of decent affordable housing to low-to-moderate income households who choose to purchase a home in Norfolk. The program provides up to \$40,000 in down payment and closing cost assistance to first-time homebuyers with household incomes at or below 80 percent AMI who are purchasing a home in Norfolk.

ix. Review of Local Regulations and Policies

This chapter examines critical public and private policies and practices, and their potential impact on fair housing choice in Norfolk. This chapter explores planning and zoning, building code, social services, private practices, and other local policies.

Key Data and Insights:

- The City is developing funding mechanisms to aid in home repair and blight remediation, including technical support, financial incentives, tax abatements for repair, and a rehabilitation program to assist qualified residents to repair heating, plumbing, and accessibility alterations. (X.E)

- The Commonwealth of Virginia adopted a law in 2020 to prohibit discrimination in housing based on source of income. The City of Norfolk codified this prohibition in early 2022.
- While there is an extensive public bus network in Norfolk, long headways of 30 minutes to an hour and limited nighttime service present challenges to people who rely on public transportation. (X.C.i)
- Through stakeholder interviews and reviewing the most recent data on building permits and housing stock, there appears to be a lack of housing diversity and decreasing middle housing (two-to-six-unit buildings) in Norfolk. Norfolk is still zoned primarily for single-family residential with most multi-family development relegated to arterial roads
- The City is working to address housing diversity with the adoption of the Missing Middle Pattern Book and encouraging the development of homes between two and six units to support affordability and accommodation of different family sizes.

x. Program and Portfolio Analysis

This chapter provides an overview of the participants, activities, and allocations to each federally funded housing program in Norfolk. Such a review helps to determine if available programs are adequately serving eligible persons.

Key Data and Insights:

- In FY 2021, the City of Norfolk received \$9,080,824 from HUD for housing and community development programs. (XI.A)
- The City used CDBG funds to serve at least 129,029 people. (XI.A.i)
- The City has implemented a variety of targeted programs to increase housing supply, diversity, and quality. (XI.B)
- The consolidation of housing and community development into a single City department is a step forward in prioritizing fair and affordable housing in Norfolk.
- LIHTC properties are concentrated in R/ECAPs, including one ZIP Code in particular, indicating LIHTC developments are not necessarily serving to desegregate Norfolk neighborhoods. (XI.D)

City of Norfolk Actions:

- Federal grants received to produce mixed income housing: The City and NRHA applied for and received a \$30M HUD Choice Neighborhood Initiative (CNI) grant to transform the Tidewater Gardens public housing community into a mixed-income, mixed-use neighborhood. The Choice Neighborhoods Initiative (CNI) was the U.S. Department of Housing and Urban Development's (HUD's) flagship redevelopment program and at the time its most significant neighborhood transformation initiative in decades. CNI supported local agencies to rebuild distressed public and assisted housing into mixed-

income developments. Building on lessons from its predecessor initiative, HOPE VI, CNI mandated that affordable housing units be replaced 1:1 in any new project and that lease-compliant housing residents be able to return to new developments after they were completed. One of CNI's critical innovations was to extend efforts past the housing development and into the surrounding neighborhood, thereby supporting the vibrancy of the community as a place where a variety of people with different incomes would choose to live.

- The St. Paul's Area in Norfolk is home to the region's highest concentration of public housing with 1,674 aging units that do not meet modern building standards in three adjacent family public housing communities. This area is undergoing a resident-led neighborhood transformation, beginning with the Tidewater Gardens neighborhood with support from a \$30 million HUD Choice Neighborhoods Initiative grant. The transformation will result in a mixed-use, mixed income neighborhood just east of Norfolk's downtown business district which will expand affordable housing and economic opportunities for residents.
- In FY 2019, with support from federal, local, and private resources, the city began the St. Paul's People First Initiative. People First seeks to address current family challenges, empower residents to lead healthy, prosperous lives, and build upon existing community strengths and assets. The program is providing effective and high-quality mobility services and human capital investment services to residents in Tidewater Gardens, phase 1 of the St. Paul's Area redevelopment. As the transformation progresses, People First will work with families from the other two communities as well. Urban Strategies, Inc. (USI), a non-profit organization, was selected by the City and NRHA through a competitive procurement process to implement the People First program. The Norfolk Plan to Reduce Poverty published in 2014 as well as the Norfolk Inclusive Economic Development Strategy developed in 2019 serve as guides for the goals and strategies for reducing poverty in Norfolk.
- In August 2020 the City of Norfolk released design principles for multifamily developments, to express the City's desire to facilitate high quality multifamily development that provides a mix of type and cost of housing accommodation. These principles will be used to evaluate multifamily housing in all neighborhoods and character districts. The goal of these principles for the physical design of multi-family housing is to re-establish the American Tradition of diverse neighborhoods and create a full range of housing opportunities for all. The guidelines suggest ways in which neighborhoods can be strengthened by the introduction of multi-family homes and new multifamily developments that are sufficiently diverse to become neighborhoods instead of projects.
- The Department of Economic Development runs a workforce development program called Norfolk Works. Norfolk Works is designed to align economic and workforce development efforts, champion the recruitment of diverse Norfolk talent to support

business attraction, retention, and expansion, and collaborate with our workforce partners to help Norfolk citizens prepare for and connect to in-demand employment opportunities. Norfolk Works assists individuals with professional resume writing, job applications, and workforce training opportunities.

- The City of Norfolk is undertaking a transformational flood mitigation effort known as the Ohio Creek Watershed project. The Ohio Creek Watershed includes two residential, predominantly African American neighborhoods with civic leagues and a strong community identity: Historic Chesterfield Heights with over 400 houses on the Historic National Register; and Grandy Village, which includes a public housing community with more than 300 units. This approximately \$130 million project, supported with local funding, CDBG, and CDBG-DR, will reduce flooding, improve public spaces and ensure the adjacent neighborhoods thrive for years to come.
- The City of Norfolk has recently been awarded approximately \$400 million in federal grants to support the Coastal Storm Risk Management project. The Norfolk Coastal Storm Risk Management Project was designed in partnership with the U.S. Army Corps of Engineers and establishes a system of surge barriers, tidal gates, floodwalls, levees, pump stations, and non-structural measures to reduce and manage flooding. This grant funding will form the first construction contract of a larger \$1.6 billion project to protect the city from flooding.

xi. Fair Housing Trends and Complaints

This chapter outlines the process for formal fair housing complaints through a review of the fair housing enforcement process. Data for complaints filed locally and at the federal level is documented to spot trends.

Key Data and Insights:

- Disability cases were the most common in 2019, the last full year of formal reporting available, closely followed by race cases. (XII.C)
- 68 formal fair housing complaints were filed with the State between 2012 and 2021. (XII.D)

City of Norfolk Actions:

- The City maintains a fair housing ordinance found in Chapter 45.1 of the Municipal Code. The Code was updated in 2022 to prohibit housing discrimination in Norfolk based on “source of funds,” which is consistent with the same State policy that was established in 2020.

xii. Review of Prior and Current Actions Taken to Affirmatively Further Fair Housing

This chapter presents the impediments to fair housing choice previously identified in 2011 and a summary of the actions taken to address those challenges. The analysis and its results help outline the underlying and trends that are still relevant today.

Key Data and Insights:

- The City has taken steps to counteract fair housing impediments. (XIII.C)
- The City began the St. Paul's Transformation that includes the phased redevelopment of 1,674 public housing units in 2018. (XIII.D)

City of Norfolk Actions:

- In 2016, a Norfolk Affordable Housing Strategy was created by HR&A for the City of Norfolk in 2016. The study investigated current market conditions and housing needs and then proposed recommended housing strategies, many of which have been implemented. The City of Norfolk is in the process of procuring an updated housing study, to be completed in FY 2023.
- The City of Norfolk's comprehensive plan, PlaNofolk 2030 is in the process of being updated. The new PlaNofolk 2050 will be used to guide decision-making about physical development and public infrastructure. It is intended to be sufficiently flexible to respond to changes in development patterns and contains the broad outlines neighborhoods will use to guide and plot their path to the future.

xiii. 2022 Impediments to Fair Housing Choice

This chapter presents the impediments to fair housing choice identified through the 2022 Analysis of Impediments to Fair Housing Choice assessment process for the City of Norfolk.

Key Data and Insights:

- Some impediments identified in the 2011 AI are still applicable, including housing quality and home lending disparities. (0)
- Some trends have reversed since 2011 but remain considered impediments due to new market pressures, notably the demand for smaller units, whereas in 2011, larger units were in shorter supply relative to demand.
- The City of Norfolk has many programs, initiatives, and tools available to begin to address the wide range of impediments, but multi-agency collaboration will be critical to solve complex challenges.

Following is a brief summary of the identified impediments along with their related recommended actions. More details about each can be found in Section 0 and Section XIV.B respectively. As more thoroughly described in Section XIV, impediments are “any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.” It is worth noting that the “action, omission, or decision” can be caused by any party or various entities. Recommended actions are primarily crafted for the City of Norfolk and its partners to have the opportunity to address each impediment, regardless of the original cause or responsible party.

1. **Affordable Housing:** Black or African American households bear the largest share of severely cost burdened households—those that pay 50 percent or more of their income on housing. Low- to moderate-income households and protected classes regardless of income have challenges accessing affordable and well-located rental units and homeownership opportunities.

Recommendations:

- a. Adopt HUD’s Small Area Fair Housing Rents in more areas.
- b. Limit opportunities for for-profit LLCs to acquire multi-unit properties at the end of their affordability period.
- c. Increase marketing and technical assistance to developers about missing middle housing.
- d. Explore new funding sources such as local bonds and tax credits.
- e. Continue to advocate for an Inclusionary Zoning Policy.
- f. Design policies and programs that strongly incentivize placement of new affordable housing units in high opportunity areas.

2. **Housing Age and Quality:** Older homes impact affordability due to high maintenance and utility costs, putting greater pressure on fixed- or lower-income residents, who are typically seniors and disabled. Historic housing stock is also less likely to be accessible, potentially limiting choice for seniors and persons with disabilities. Older homes also pose a greater chance of exposure to negative environmental health conditions caused by lead and mold, which can be costly to remedy.

Recommendations:

- a. Create or adapt existing rehab program to make available to landlord or owner-occupied applicants.
- b. Publish a building standards guide for developers and landlords for rehab and new construction.
- c. Implement effective code enforcement programs and widely publish standards for homeowners.

3. **Diversity of Housing Types:** The current trend in new housing construction may not meet the needs of Norfolk’s aging population and decreasing household size. The number of larger four-and five-bedroom units has increased since 2014 while the proportion of smaller units has decreased. It is worth noting that qualitative research

still suggests that households with more household members have a difficult time finding housing suitable to accommodate all family members. Recent zoning ordinance changes that prohibit most manufactured housing effectively eliminate a flexible and affordable housing type.

Recommendations:

- a. Market existing technical assistance documents more aggressively.
- b. Develop additional technical assistance to small developers about developing small properties.
- c. Emphasize and market a campaign to increase large household landlord participation in Housing Choice Voucher (HCV) programs.
- d. Continue to examine the appropriateness of single-family zoning.
- e. Review prohibitions on permanent and semi-permanent manufactured housing in residential base zoning districts, analyzing housing affordability impacts.

4. **Accessible Housing:** Norfolk has a large population of people with disabilities below the poverty threshold and a lack of units that can accommodate their needs.

Recommendations:

- a. Design grant programs for landlord or tenant applicants to apply for accessibility upgrades.
- b. Assess the current accessible housing stock and identify best practices for, or examples of, design of accessible units.
- c. Publish and promote a basic accessibility building standards guide with requirements and best practices as technical assistance.
- d. Offer developer incentives for projects that include units built according to universal design principles.
- e. Examine the zoning ordinance to ensure that there is an adequate method for reasonable accommodation requests.

5. **Home Lending Disparities:** Protected classes face greater challenges to leverage home lending opportunities and market capital.

Recommendations:

- a. Charge an existing City agency with the role to act as liaison between financial institutions and housing advocates.
- b. Encourage lenders to reinvest in areas with majority-minority populations.
- c. Encourage more lending institutions to include Federal Housing Administration (FHA) loans in their portfolio and market more aggressively.
- d. Publicly praise or otherwise recognize financial institutions with a record of supporting fair housing initiatives.

6. **High Eviction Rates:** Based on data collected over the past 10 years, Norfolk has one of the highest eviction rates in the country. It is generally understood that eviction disproportionately impacts protected class populations, such as women, women of

color, families with children, and minorities at a higher rate than other sub-populations.²

Recommendations:

- a. Assess and report out on the impacts of recent programs intended to help stem evictions.
- b. Based on assessment above, consider funding experienced partners to improve design for desired goals.
- c. Develop pathways to address evictions within the judicial system.
- d. Develop a communications plan to support enhanced education and training.
- e. Advocate for policy changes that currently enable easy eviction filings.

7. **Environmental Health and Climate Justice:** Residents face risks inside and outside their homes. Inside, the potential for high concentrations of lead-based paint in much of the city's historic housing stock makes it more likely that the negative impacts of lead-based paint will affect populations with children, a protected class under "familial status." Outside the home, Norfolk is a coastal city adapting to climate changes sooner than most other U.S. cities. The risk of flooding threatens residents' livelihoods and assets and further restricts housing development opportunities. Additionally, low-income neighborhoods and those with high populations of protected classes regardless of income are more likely to be located near polluting activities, including heavy industry and highways.

Recommendations:

- a. Launch a lead-based paint remediation rehab program that is open to landlord or owner-occupied applicants.
- b. Continue to, and increase when appropriate, prioritize properties for rehab programs for homes that have small children.
- c. Develop a relationship with the Department of Public Health for notification when a child is reported to have an elevated blood lead level.
- d. Create programs to incentivize contractors to become state certified lead abatement contractors. Prioritize potential Disadvantaged Business Enterprise (DBE) firms.
- e. Prioritize racial desegregation and deconcentration of poverty by focusing affordable housing development incentives outside R/ECAPs.
- f. Continue to build awareness of flood risks and insurance imperatives as well as incentivize a variety of options for flood mitigation at home.
- g. Improve coordination between NDHCD, Department of Emergency Preparedness and Response, and Office of Resilience to prioritize flood risk mitigation in low-income residential areas and those with high populations of protected classes regardless of income for the Hazard Mitigation Plan.

² "Why Eviction Matters" Eviction Lab, <https://evictionlab.org/why-eviction-matters/#who-is-at-risk>

- h. Reexamine zoning and development standards for multi-family housing development that requires proximity to major arterial roads.
- 8. **Fair Housing Policy and Compliance:** Despite national and state laws about fair housing, it is commonly understood that the burden of proof is on already over-burdened residents (i.e., protected classes) for non-compliance with fair housing laws. Moreover, lack of public awareness about fair housing laws and how or when to file a complaint limits the ability of authorities to address or maintain records of non-compliance

Recommendations:

- a. Provide fact sheet to public housing/subsidy beneficiaries about fair housing laws and how to file a complaint.
- b. Update City of Norfolk website to include a stand-alone page nested under the appropriate office to publish fair housing information and processes.
- c. Fund and charge experienced local organizations to provide fair housing education and testing efforts as well as periodic review and analysis of lending data.
- d. Identify a City agency to collect data on protected classes and include LGBTQ+ in their reviews.

B. Conclusion

While the City of Norfolk has significant fair housing challenges, there is also a strong opportunity to address them through deliberate efforts, many of which are already underway. The City is at an advantage because of the many programs and policies across departments that have been designed and implemented in recent years, including the consolidation of housing and community development functions into one department. With the recommendations proposed in this report and other coordinated efforts, the City of Norfolk can work toward meeting the housing needs of its residents over the next five years and create a foundation for sustainability into the future.

II. Introduction

A. Overview

The U.S. Department of Housing and Urban Development (HUD) requires that entitlement communities complete an Analysis of Impediments to Fair Housing Choice (AI) approximately every five years, at the same time as their Consolidated Plan, to inform design of local programs and housing policy.

In 2021, HUD issued a mandate by way of the Interim Final Rule, “Restoring Affirmatively Furthering Fair Housing Definitions and Certifications”, which requires program participants to submit certification that they will affirmatively further fair housing in connection with their Consolidated Plans, Annual Action Plan, and Public Housing Agency (PHA) plans. This is a reinstatement of an Obama Administration rule that was replaced in 2020. Cities are required to analyze local housing data for discriminatory patterns and submit plans to address those patterns. As the primary grantee of HUD Community Planning and Development (CPD) funding, the City of Norfolk is maintaining its fair housing planning obligation through the completion of this AI. The AI covers policies, practices, and procedures affecting housing choice for residents in the city.

In an effort to continue to prioritize affordable housing for the City of Norfolk, the City established the Norfolk Department of Housing and Community Development (NDHCD) in 2021. NDHCD consolidated and created a variety of complementary City functions into one department, including managing federal programs, preserving neighborhoods and housing, creating housing policy, and supporting neighborhood transformation. The department currently administers a variety of HUD-funded federal programs, including:

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

These programs help to address an array of housing and community needs in Norfolk, including housing affordability, access to housing, homelessness, and other public services. This assessment focuses on how these programs, alongside other local actions, can help further fair housing goals and address impediments to fair housing choice for all Norfolk residents.

B. Definitions

i. Fair Housing Choice

The U.S. Department of Housing and Urban Development (HUD) enforces the Fair Housing Act, which prohibits discrimination and the intimidation of people in their homes, apartment buildings, and condominium developments in nearly all housing transactions, including the rental and sale of housing and the provision of mortgage loans. Fair Housing Choice refers to equal access to rental housing and homeownership. Housing providers who refuse to rent or sell homes to people based on race, color, national origin, religion, sex, familial status, or disability are violating federal law.³

ii. Impediments to Fair Housing Choice

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

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

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

There are three main components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an “action, omission, or decision.”⁴

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

³ Fair Housing Equal Opportunity for All Booklet HUD,
https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF

⁴ Fair Housing Planning Guide, Vol. 1, HUD, <https://www.hud.gov/sites/documents/FHPG.PDF>

impediments as possible and offer ways for the city government or its partners to address challenges, regardless of the original cause or responsible party.

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

iii. Protected Class

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

iv. City of Norfolk

As a recipient of HUD funding, the City of Norfolk is required by the Fair Housing Act to affirmatively further fair housing. This Analysis of Impediments to Fair Housing Choice was commissioned by the City of Norfolk Department of Housing and Community Development and covers the area within Norfolk city limits. The most recent Analysis of Impediments was conducted in 2011 by a regional organization and covered the City of Norfolk as well as the Hampton Roads region.

C. Data Sources

For the demographic analysis, most Norfolk data comes from publicly available US Census datasets. The 2020 Census data is used where possible, but where not possible, American Community Survey (ACS) Five-Year Estimates for 2019 are used. Other information was drawn from the City of Norfolk's Comprehensive Plan (General Plan), previous Consolidated Plans, and a variety of locally produced planning and policy documents. Wherever possible, city data is compared to available and relevant regional (Virginia Beach-Norfolk-Newport News, VA-NC, Metropolitan Statistical Area) and state (Commonwealth of Virginia) data.

III. Community Participation Process

A. Community Engagement Overview

Community engagement is a process that entails various methods to ensure broad and meaningful participation in the development of any planning document. Community engagement and participation are central to the development of this report; thus, this Section is dedicated to that process. Throughout the AI process, the City of Norfolk's consultant team met with local officials and stakeholders and hosted a community-wide survey to achieve a broad accumulation of information directly from those most impacted, either personally or professionally, by housing availability and housing options in Norfolk. The City also hosted a Public Meeting and provided 30 days of Public Comments for the draft report. The feedback and results from these engagement activities were used to help identify barriers to fair housing that will be addressed using this report.

i. Public Meeting and Comments

Following the completion of the draft AI, the City of Norfolk made the draft available digitally on the City website and in print at three libraries. There was an open public comment and question period between July 24, 2022 and August 23, 2022. Comments and questions received during this time are documented and, in many cases, directly responded to in Appendix C.

During the public comment period, on August 4, 2022, the City of Norfolk hosted a public meeting to discuss the draft AI. Norfolk residents attended in person at Norview Community Center and online via Webex. An online recording of the presentation and comments from the meeting is available here: <https://www.norfolk.gov/5302/News-and-Announcements>.

Comments and questions submitted during the public comment period are recorded and addressed in Appendix C.

ii. Stakeholder Engagement

Stakeholder engagement was primarily pursued through formal interviews. Forty-two diverse stakeholder organizations were contacted for an interview and 23 interviews took place representing 21 organizations between February and March 2022 to collect deeper insight into fair housing issues in Norfolk. Another purpose of contacting a diverse range of stakeholders is to further foster the development of a strategy to increase access to opportunity by including people who can leverage their expertise, resources, and investments that may result in the broadest impact.⁵

Representatives from the stakeholder organizations listed in Table 1 were interviewed for this report.

Table 1: Stakeholder Organizations Interviewed

City of Norfolk Department of City Planning
City of Norfolk Department of Housing and Community Development
City of Norfolk Department of Human Services
City of Norfolk Department of Transit
City of Norfolk Department of Neighborhood Services
City of Norfolk Office of Resilience
Grandy Village Public Housing Tenant Management Council
Hampton Roads Community Housing Resource Board
HOME of VA
Homeless Elders Coalition
Legal Aid Society of Eastern Virginia – Norfolk Office
LISC Hampton Roads
Local school social workers
Norfolk Community Services Board
Norfolk Department of Parks and Recreation
Norfolk Redevelopment and Housing Authority
Slover Library
Southeastern Virginia Homeless Coalition
The Urban Renewal Center
Urban League of Hampton Roads
Virginia Community Capital

⁵ Affirmatively Furthering Fair Housing Rule | Assessment of Fair Housing | Potential Roles for Stakeholders in the AFH Process. Policy Link. https://www.policylink.org/sites/default/files/AFH_Roles_Matrix%20.pdf

iii. Community Survey

The City hosted a public survey from March 7, 2022 until March 21, 2022, that could be completed online or by submitting a physical copy. The purpose of the survey was to solicit feedback about fair housing issues and community needs from those most directly involved with housing and those living and/or working in Norfolk. The City notified stakeholders and the public about the online survey by posting it on the City of Norfolk website and e-mailing the online survey link to the stakeholder list that participated in interviews for this report and attendees of a December 2021 public meeting hosted by the City as well as directly to housing program participants. The survey was also advertised on City of Norfolk social media channels. Physical copies of the survey were available at four public libraries: Mary D. Pretlow, Slover, Jordan-Newby, and Richard A. Tucker Memorial. Hard copies were also distributed and completed by St. Paul's area public housing participants, including Tidewater Gardens, Calvert Square, and Young Terrace. Overall, 415 responses were recorded, 17 of which were returned as a hard copy. It is worth noting that respondents were not required to answer every question and consequently the results do not reflect an answer to every question on each response. The following section provides an overview of the community needs survey results.

B. Community Engagement Results

i. Community Needs Survey Respondents

Out of 415 survey responses, 398 online and 17 hard copies, most respondents were concentrated from 13 ZIP codes in Norfolk, Portsmouth, and Virginia Beach. The table below shows the ZIP codes from where at least three people responded. Some respondents lived outside the city but in the region. The survey included these respondents in order to include the perspective of people who may work in Norfolk, want to live in Norfolk, or are otherwise unable to live in Norfolk.

Table 2: Community Survey Responses by Residential ZIP Code (3+ Responses)

ZIP Code	Number of Responses
23502	40
23503	49
23504	43
23505	43
23507	23
23508	25
23509	23
23510	21
23513	43
23517	16
23518	34

23523 (Portsmouth)	12
23464 (Virginia Beach)	4

Of the 297 respondents that answered the question about gender, 74 percent identified as female, 23 percent identified as male, and 3 percent identified as non-binary. Fifty-four percent of those that answered the question about race and ethnicity: 29 percent were White, 39 percent were Black, and 5 percent identified as Hispanic or Latino. Based on 301 responses about household description, most respondents own their home (52 percent) and live in a small household of 1-4 people (84 percent) and are employed full-time (45 percent) or retired (17 percent). Ten percent self-identified as disabled, and 26 percent of respondents live in a household where at least one person has a disability. For the 288 respondents that replied to the question about household income, the breakdown is over \$100,000 (23 percent), between \$50,001-\$100,000 (30 percent), between \$25,001-\$50,000 (28 percent), between \$10,000-\$25,000 (11 percent) and below \$10,000 (8 percent). Table 3 provides further details about the housing status of the survey respondents which is an important factor when considering their responses to the qualitative questions throughout the survey.

Table 3: Housing Status of Survey Respondents

Answer Choices	Responses	
Rent	41.72%	126
Own home	52.32%	158
Homeless	2.32%	7
Living doubled up/with friends, family	6.29%	19
Have another person/family living in my home	7.95%	24
Receive a housing subsidy	1.99%	6
Have difficulty making monthly housing expenses	10.26%	31
Have been late on rent or mortgage payments at least twice in past six months	4.64%	14

ii. Community Needs Survey Results

The community needs survey posed questions related to opinions about current neighborhood conditions, neighborhood aspirations, housing conditions and fair housing.

- Eighteen percent indicated that better safety, less crime or more police as the one thing they would change about their neighborhood, the highest number of related responses than any other category of responses to this question.

- Seventy percent of respondents selected public safety as a “high need” in Norfolk (Figure 1).

Figure 1: Survey Results, Prioritization of Public Services in the City

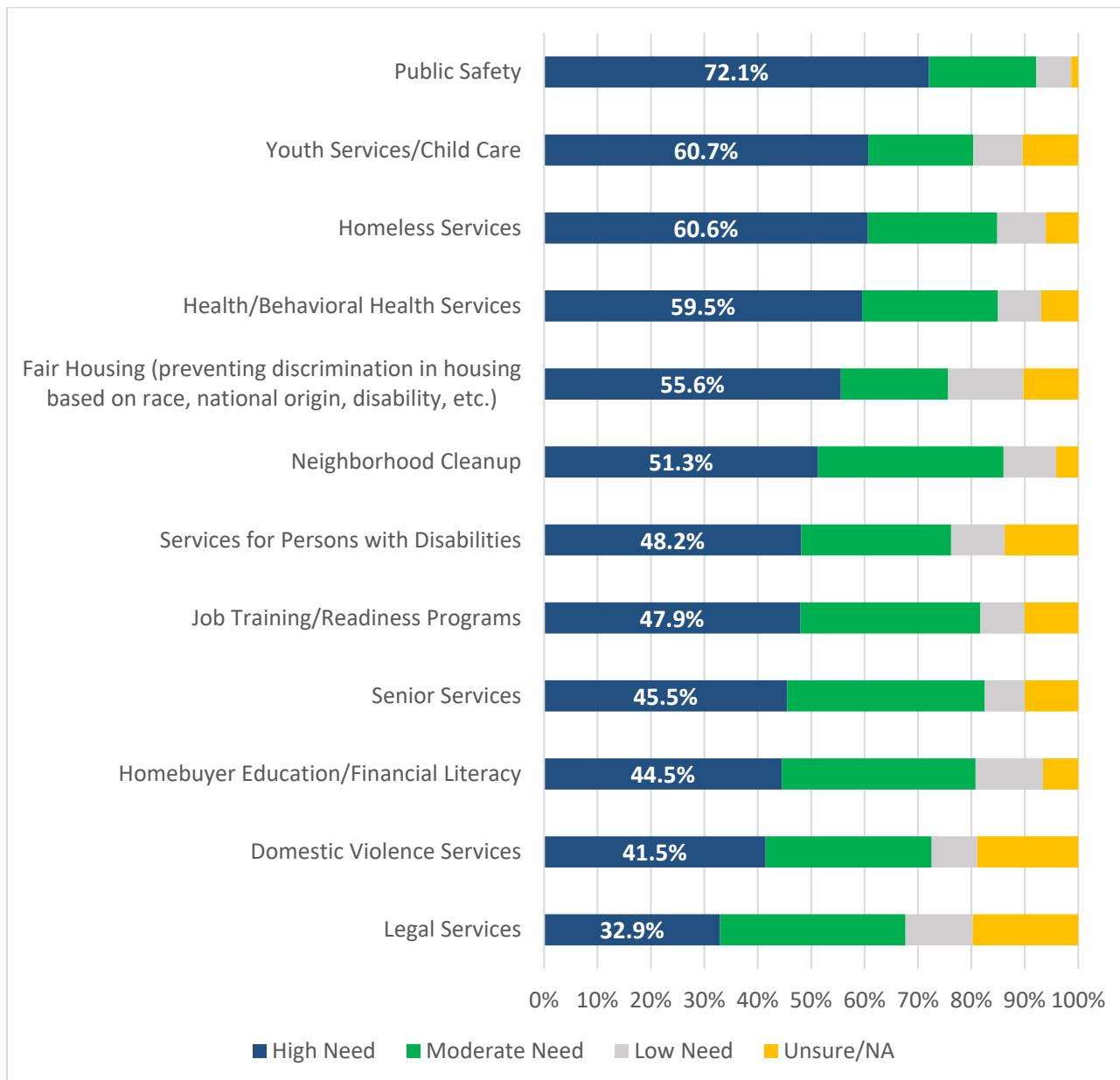
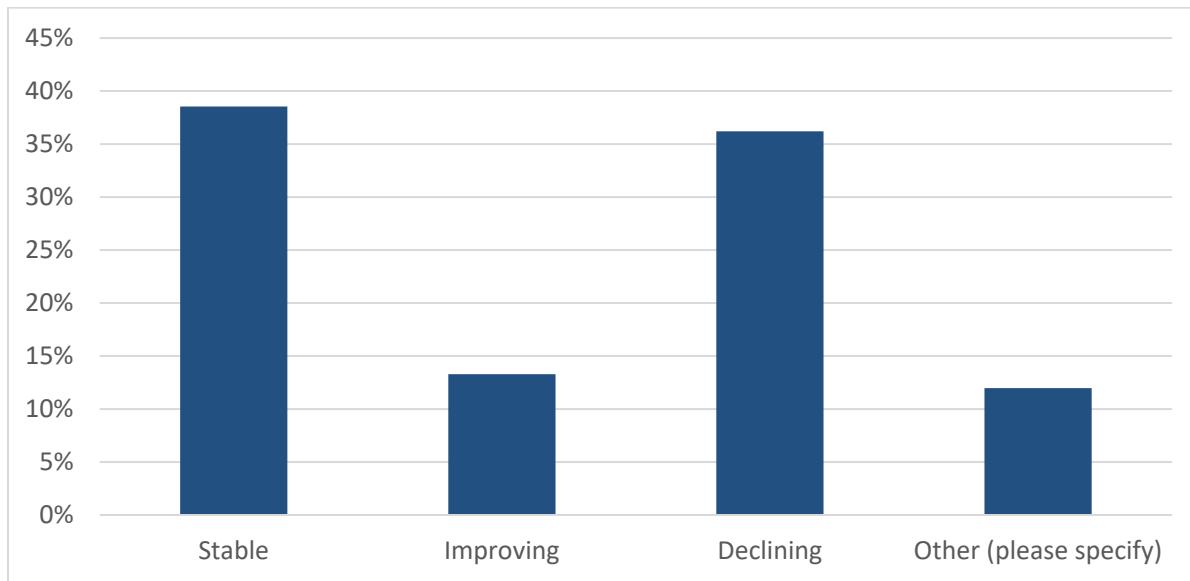


Figure 2: Survey Results, Respondents Opinion of Physical Housing Conditions



Survey respondents were generally split regarding their opinion of their physical housing conditions, with nearly 40 percent considering them “stable,” while more than 35 percent rated their housing conditions as “declining” (Figure 2). The survey asked respondents to rank a list of five community development needs in priority order from most important to least (Figure 3).

Figure 3: Survey Results, Community Development Priorities**Responses Related to Access to Housing:**

- 77 percent think that affordable housing is a critical issue in Norfolk.
- 73 percent indicate that the price of housing is the most important consideration when choosing a place to live (Figure 4).
- 58 percent think that housing displacement is a critical issue in Norfolk while 48 percent think that evictions are a critical issue in Norfolk.
- Among 12 public services, 54 percent selected fair housing, preventing discrimination in housing related to protected classes, as a high need.
- Of the respondents that indicated they are not satisfied with their current living situation; lack of safety was the most common reason. (Figure 5).
- 60 percent of respondents indicate that their barrier to moving is affordability and/or moving expenses.
- Of the respondents with at least one household member with a disability (26 percent):
 - i. 11 percent indicate that their landlord refused to make accommodations for the disability;
 - ii. 11 percent cannot afford a housing unit that has accessibility features (grab bars, ramps, parking); and
 - iii. 13 percent have trouble getting around the neighborhood due to poor infrastructure.

- Of the respondents that were denied housing in Norfolk over the past 5 years, the two main reasons were due to bad credit or income too low (Figure 6).
- 17 percent of respondents think they have been discriminated against when looking for housing in Norfolk but 78 percent those respondents did nothing to address the discrimination.

Figure 4: Survey Results, Housing Choice Priorities

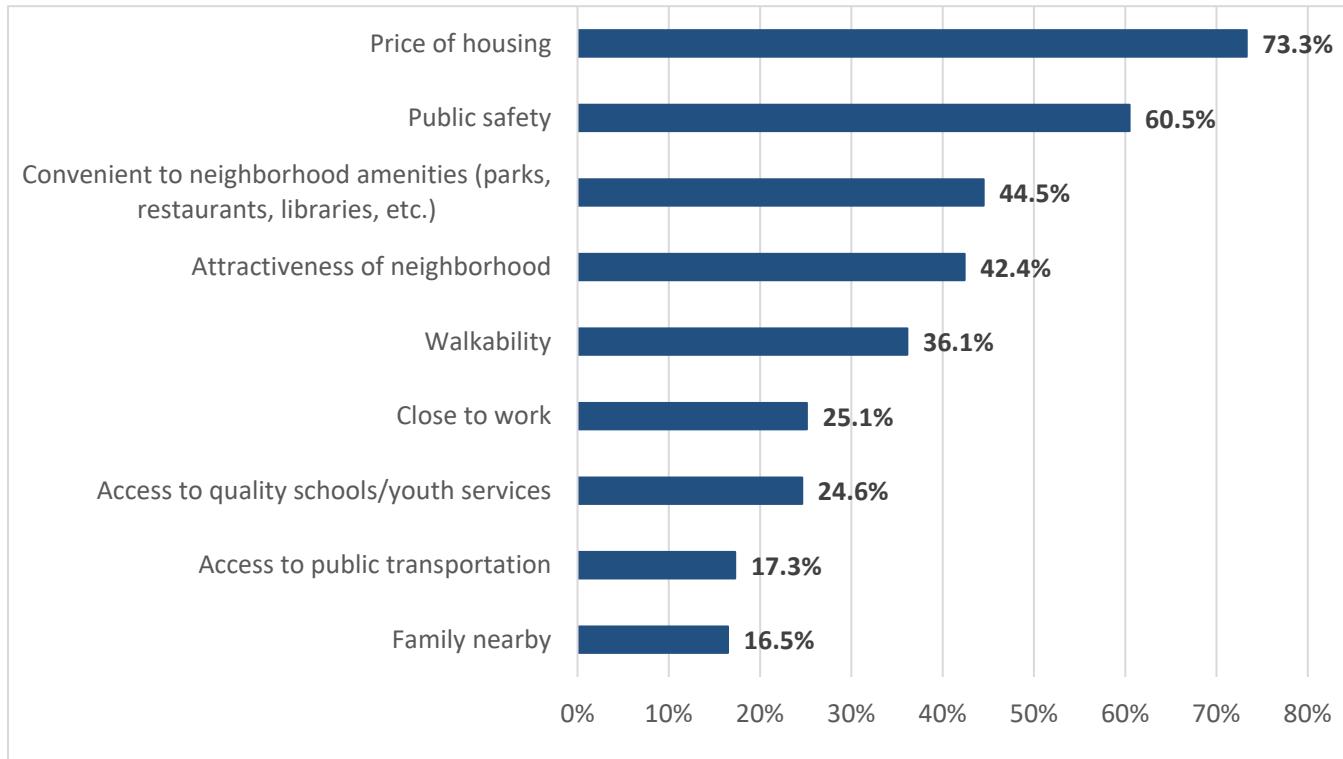
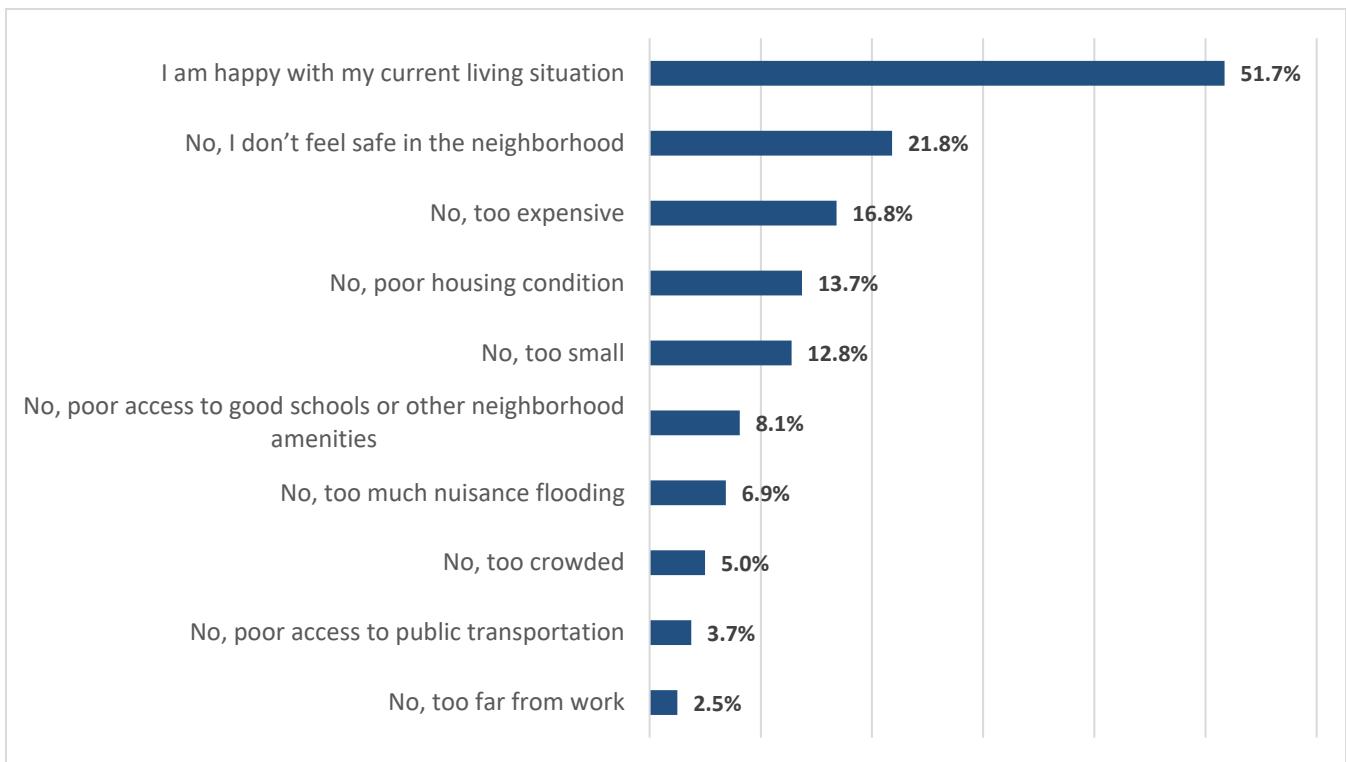
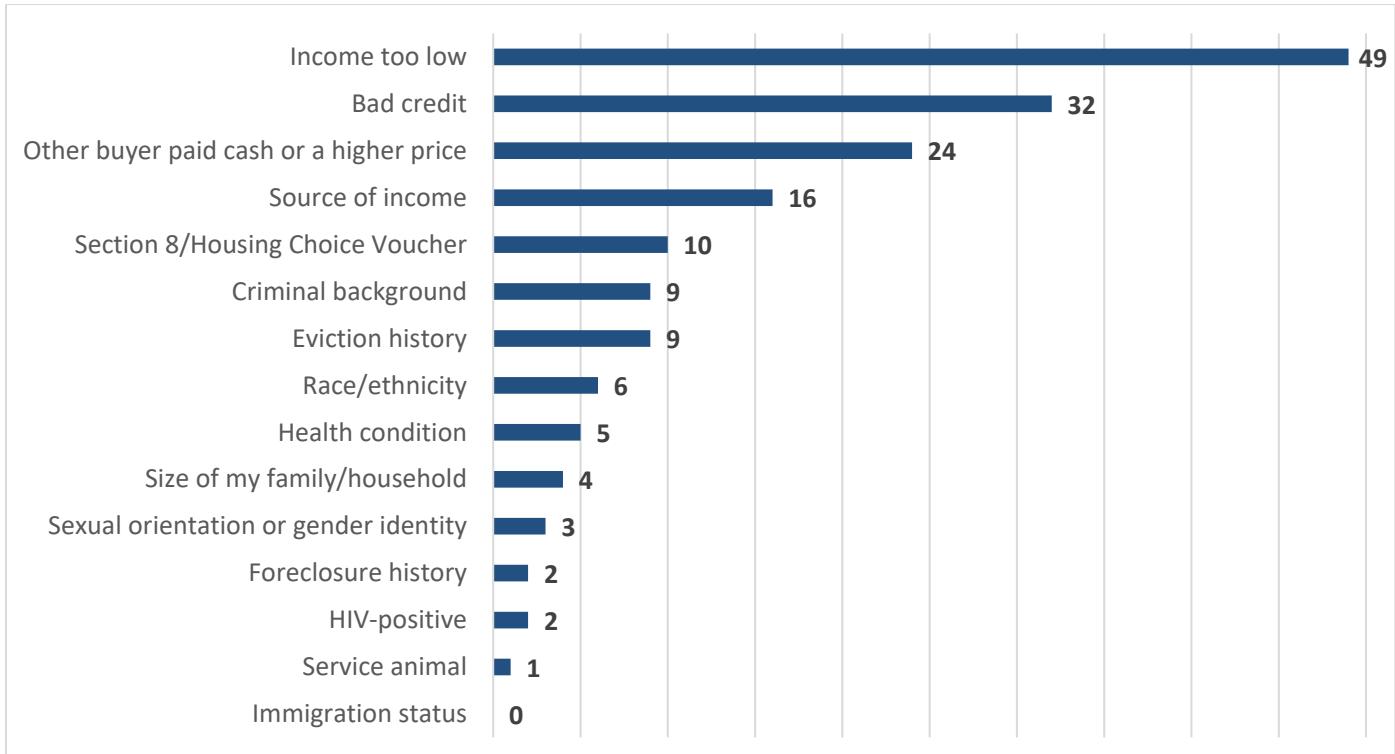


Figure 5: Survey Results, Satisfaction with Current Living Situation**Figure 6: Survey Results, Perceived Reasons Denied Housing**

The City of Norfolk staff is grateful to community members that took time to support our efforts to improve fair housing in Norfolk by responding to this survey and the City leadership will endeavor to take every comment into account when making decisions that impact fair housing and community development in general.

Full survey results are available in Appendix A: Community Needs Survey Results.

IV. Socioeconomic Profile

This section provides an overview of key socioeconomic trends within the City of Norfolk with comparisons to the Hampton Roads region and statewide to the Commonwealth of Virginia. An analysis of demographic and economic data provides insight into trends and patterns that may impact housing choice with an overview of the characteristics of protected classes and patterns of segregation. Most of the demographic data for Norfolk comes from publicly available U.S. Census datasets. Where possible, 2020 Census data is used, but where not possible, American Community Survey (ACS) Five-Year Estimates for 2019 are used.

Key Data and Insights:

- While the 65 and older population of Norfolk is only 12 percent of the total population, it is the age group experiencing the fastest growth rate in Norfolk. (A.ii)
- Thirty-eight percent of Norfolk seniors have disabilities, which includes ambulatory difficulties. (A.vi)
- Norfolk's population is stable, unlike the region and state. At the same time, there have been changes in the racial makeup of the city. Both Norfolk's White and Black or African American populations are decreasing while Norfolk's Hispanic population is increasing. (A.iv)
- Norfolk has a higher percentage of "non-family" households than the region and state.⁶ (A.v)
- There is significant income inequality in terms of both median income by race and percent of residents living below poverty level in Norfolk. (B.i)

A. Demographics

This section provides an overview of demographic patterns and trends within Norfolk in comparison to the Commonwealth of Virginia. This section includes population, gender, race and ethnicity, household family composition, and disability.

⁶ "Non-family households are defined by the US Census as "a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related."

<https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html>

i. Population

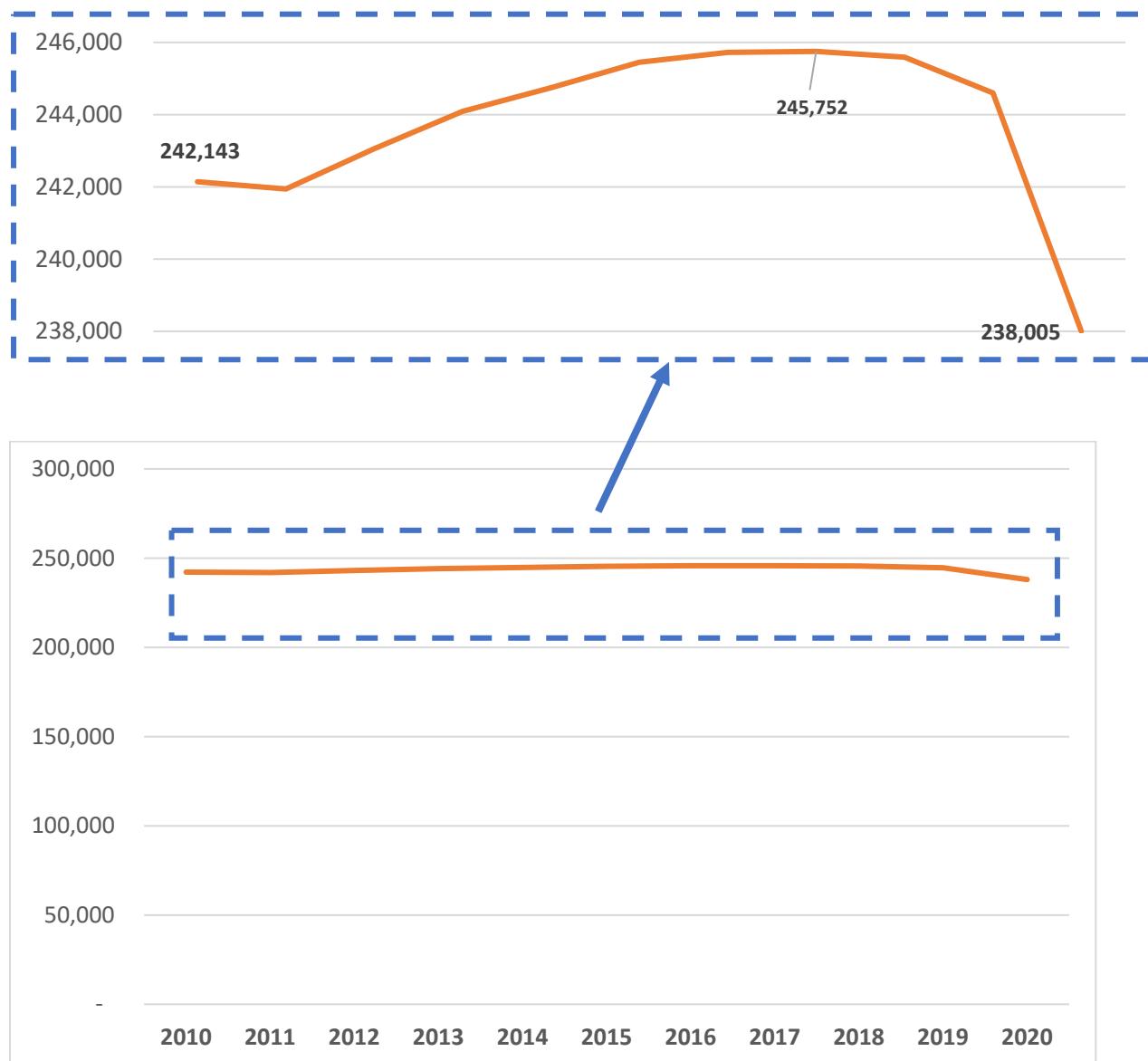
In 2020, Norfolk had a total population of 238,005. This is a 2 percent decline from the 2010 population of 242,803. During this same period, Virginia saw a 7.9 percent increase in its population. This indicates that Norfolk's population is stable compared to the state.

Table 4: Population of Norfolk, 2010 and 2020

Geography	2010	2020	Percent Change 2010 - 2020
City of Norfolk	242,803	238,005	-2.0%
Virginia	8,001,024	8,631,393	7.9%
Source: US Census Bureau, DEC data			

In Table 4, it appears at first that Norfolk's population has been stable for the past decade. However, the data shows that the population increased until 2017, peaking at 245,752, and began declining slightly until 2019-2020, when there was a sharp decline to 238,005, demonstrating a loss of more than three percent in three years.⁷ While it is difficult to predict future growth or decline, the chart in Figure 7 (next page) illustrates minimal change in population that may be trending toward decreasing.

⁷ This year-over-year trend curve is based on figures from 5-Year ACS data until 2019, followed by 2020 Census DEC data, which may explain the sharper deviation in 2020.

Figure 7: Norfolk Population Trend, 2010-2020

Source: US Census Bureau, 2006-2010, 2007-2011, 2008-2012, 2009-2013, 2010-2014, 2011-2015, 2012-2016, 2013-2017, 2014-2018, and 2015-2019 American Community Survey 5-Year Estimates. 2020 Census DEC data.

ii. Age

Since 2014, Norfolk's population has aged. The median age increased from 29.9 to 30.7. The largest increases have been in the populations between 60-74 years old and 25-34 years old. The largest decreases have been in younger populations—specifically 15-19 and 45-54 years old. An aging population often indicates the need for more robust public services to accommodate the physical and social needs of older people. At the same time, increases to early professional working-age population, as shown in the table below, may indicate opportunities for economic growth and an increasing tax base.

Table 5: Age, Norfolk, 2014 and 2019

Age Group	2014	2019	% Change
Under 5 years	16,856	16,078	-5%
5 to 9 years	14,146	13,106	-7%
10 to 14 years	12,296	12,481	2%
15 to 19 years	16,934	15,854	-6%
20 to 24 years	37,027	34,252	-7%
25 to 34 years	44,228	47,405	7%
35 to 44 years	27,507	27,809	1%
45 to 54 years	28,311	24,671	-13%
55 to 59 years	13,426	13,799	3%
60 to 64 years	10,534	12,576	19%
65 to 74 years	12,526	15,853	27%
75 to 84 years	7,321	7,184	-2%
85 years and over	3,633	3,533	-3%
Median Age	29.9	30.7	3%

Source: US Census Bureau, ACS 5-Year Data

iii. Gender

According to ACS 2015-2019, Norfolk was 52.2 percent male and 47.8 percent female in 2019. Available census data is restricted to sex assigned at birth. Data on gender identity is not currently available.

iv. Race and Ethnicity

Compared to the Commonwealth of Virginia, Norfolk has a much larger percent of residents who identify as Black or African American. In 2020, 18 percent of Virginians, compared to 39 percent of Norfolk's population, identify as Black or African American alone (not Hispanic or Latino). At the same time, Norfolk has a smaller proportion of population who identify as Asian and White than the rates for the state. The population who identifies as Hispanic in Norfolk (11 percent) is about the same as Virginia (10 percent).

Table 6: Race and Ethnicity, 2020

	Norfolk		Virginia	
	Estimate	Percent	Estimate	Percent
Race (not Hispanic or Latino)				
Total Population	238,005		8,631,393	
White alone	97,205	41%	5,058,363	59%
Black or African American alone	93,553	39%	1,578,090	18%
American Indian and Alaska Native alone	832	0%	19,080	0%
Asian alone	8,828	4%	610,612	7%
Native Hawaiian and Other Pacific Islander alone	475	0%	6,195	0%
Some other race alone	1,331	1%	45,394	1%
Two or more races	12,651	5%	404,910	5%
Hispanic or Latino (of any race)				
Total population	238,005		8,631,393	
Hispanic or Latino (of any race)	23,130	10%	908,749	11%
Not Hispanic or Latino	214,875	90%	7,722,644	89%
Source: US Census Bureau, 2020 DEC				

In the past decade, the population who identifies as White alone and as Black or African American alone decreased. The number of residents who identified as White decreased by about 12,000 people or 10.5 percent while the population who identified as Black or African American decreased by about 9,000 people or 8.6 percent. The Census asks about ethnicity separate from race. For ethnicity, the population who identifies as Hispanic increased by about 7,000 people or 43.2 percent.

Table 7: Race and Ethnicity, Norfolk, 2010 and 2020

	2010		2020	
	Estimate	Percent	Estimate	Percent
Race				
Total Population	242,803		238,005	
White alone	114,304	47%	102,841	43%
Black or African American alone	104,672	43%	95,594	40%
American Indian and Alaska Native alone	1,200	0%	1,328	1%
Asian alone	7,999	3%	9,025	4%
Native Hawaiian and Other Pacific Islander alone	396	0%	521	0%
Some other race alone	5,407	2%	9,445	4%
Two or more races	8,825	4%	19,251	8%

Ethnicity	2010		2020	
	Percent	Estimate	Percent	Estimate
Hispanic or Latino (of any race)	16,144	7%	23,130	10%
Not Hispanic or Latino	226,659	93%	214,875	90%
Source: US Census Bureau, 2010 and 2020 DEC				

v. Household Familial Composition

Average household size is smaller in Norfolk compared to the MSA and the state at an average of 2.47 people per household. At the same time, the average family size in Norfolk is larger than both the MSA and Virginia. This is due to many non-family households which includes Norfolk residents living alone and with non-family roommates.⁸

Table 8: Average Household Family Size, 2019

	Norfolk	MSA	Virginia
Average household size	2.47	2.55	2.61
Average family size	3.18	3.11	3.17
Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates			

Household and family sizes in Norfolk have decreased over the past decade. Household size decreased from an average household size of 2.56 in 2014 to 2.47 in 2019. Family sizes have also become smaller, decreasing from an average family size of 3.28 in 2014 to 3.18 in 2019. This could be due to an increase in young, childless adults and elderly populations. An increase in single-person and smaller households is important in considering the needs of the population regarding housing types and housing diversity.

Table 9: Average household and family size 2014 vs. 2019

	2014	2019
Average household size	2.56	2.47
Average family size	3.28	3.18
Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates		

Norfolk has a larger share of non-family households (43 percent) than the MSA and state. At the same time, the average household size is smaller.

⁸ A non-family household consists of a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related. (US Census)

Table 10: Household Type by Household Size, 2019

	Norfolk	MSA	Virginia
Total Households	88,353	663,821	3,151,045
Percent family	57%	66%	66%
Percent non-family	43%	34%	34%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Table 11 provides an overview of household types for the city, region, and state. Relative to the region and state, Norfolk has the lowest percent of family households. Family households with children in the MSA and statewide comprise 28 percent of households, compared to 26 percent in Norfolk. The city, however, has the highest proportion of female households and female households with children. Female households comprise 17 percent of Norfolk's total households, which is higher than the MSA (14 percent) and the state (12 percent). Female households with children also represent a larger portion (10 percent) of the population compared to the MSA (8 percent) and state (6 percent). This is an important demographic observation, as housing discrimination based on underlying stereotypes of female-headed households with children impacts people of color when looking to rent or purchase a home, as stated in HUD's 2012 Housing Discrimination Against Racial and Ethnic Minorities report.⁹

Table 11: Family Household Type, 2019

	Norfolk		MSA		Virginia	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Family Household	50,487	57%	440,140	66%	2,091,934	66%
Family household with children	22,769	26%	187,454	28%	888,675	28%
Married-couple households	30,916	35%	313,041	47%	1,586,494	50%
Married-couple households with children	12,084	14%	119,737	18%	636,104	20%
Female householders	15,436	17%	95,554	14%	367,203	12%
Female householders with children	8,799	10%	52,441	8%	190,043	6%
Non-family household	37,866	43%	223,681	34%	1,059,111	34%
Total households	88,353		663,821		3,151,045	

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

⁹“Housing Discrimination Against Racial and Ethnic Minorities 2012”, HUDUser.gov, https://www.huduser.gov/portal/Publications/pdf/HUD-514_HDS2012.pdf

Norfolk has gained about 2,000 households in the past five years. Most of that growth is in non-family households while family households with children declined. At the same time, 57 percent of households are still family households, although only about a quarter (26 percent) of households are family households with children. Average household size is declining as more people live alone and without children, and as a result, population is stagnating.

Table 12: Family Household Type, Norfolk, 2014 and 2019

	2014		2019	
	Estimate	Percent	Estimate	Percent
Family Household	50,026	58%	50,487	57%
Family household with children	23,405	27%	22,769	26%
Married-couple households	29,635	34%	30,916	35%
Married-couple households with children	11,923	14%	12,084	14%
Female householders	15,726	18%	15,436	17%
Female householders with children	9,314	11%	8,799	10%
Non-family household	36,371	42%	37,866	43%
Total households	86,397		88,353	

vi. Disability

The most common disability types in Norfolk are ambulatory, independent living, and cognitive difficulty. As defined by the Census, an ambulatory disability is defined as having serious difficulty walking or climbing stairs, while independent living is defined as a physical, mental, or emotional problem and having difficulties doing errands alone, such as visiting a doctor's office or shopping. Cognitive difficulty includes a physical, mental, or emotional problem and having difficulty remembering, concentrating, or making decisions.

All of these disabilities are more proportionately represented in the older population. There is a need for accessible and supportive housing for all age groups in Norfolk. As the population continues to age, these figures show that the demand for affordable and accessible supportive housing is likely to increase.

Table 13: Disability Type by Age Group, Norfolk, 2019

Disability Type	Population with a Disability		65 Years and Over		Under 65 Years	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Hearing difficulty	6,476	3.0%	2,978	11.5%	3,498	1.8%
Vision difficulty	5,546	2.6%	1,918	7.4%	3,628	1.9%
Cognitive difficulty	12,563	6.3%	2,852	11.0%	9,711	5.1%
Self-care difficulty	6,437	3.2%	2,721	10.5%	3,716	2.0%
Ambulatory difficulty	15,411	7.7%	6,873	26.5%	8,538	4.5%
Independent living difficulty	11,035	6.6%	4,889	18.8%	6,146	3.2%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates. Note: Total population with a Disability includes institutionalized and non-institutionalized populations. Independent Living only includes those 18 to 64 years.

Norfolk has a larger proportion of people with disability living in poverty than both the MSA and the state. While the poverty rate in Norfolk is also higher than the MSA and the state, people with disabilities living in poverty account for 22.6 percent whereas 16.1 percent of people without disabilities live in poverty. Median earnings for individuals in Norfolk with disabilities was \$22,462 in 2019, less than both the MSA and Virginia. At the same time, Table 22 illustrates that the number of Norfolk residents with a disability living in poverty is decreasing over time.

Table 14: Disability and Income, 2019

	Norfolk		MSA		Virginia	
	Without disability	With disability	Without disability	With disability	Without disability	With disability
Number of people over 16 (for whom poverty status determined)	138,523	26,448	1,096,904	201,111	5,591,445	899,874
Number of people in poverty over 16	22,302	5,977	98,721	31,172	480,864	152,979
Percent of people in poverty over 16	16.1%	22.6%	9.0%	15.5%	8.6%	17.0%
Median earnings last year	\$ 29,385	\$ 22,462	\$ 35,815	\$ 27,901	\$ 40,183	\$ 26,916

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Table 15: Disability and Income, Norfolk, 2014 and 2019

	2014	2019
Persons with Disabilities Below Poverty Level	6,728	5,977
Median income persons with Disabilities Below Poverty Level	\$ 20,599	\$ 22,462
Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates.		

The table below shows that the number of people living with disability by age group is similar in Norfolk to both the MSA and state. More than a third (38 percent) of the population age 65 and older has a disability, which is similar to the MSA and slightly higher than the state. The prevalence of people who are low-income and have disabilities in Norfolk combined with the environment and housing conditions in Norfolk, both discussed in greater detail in the Housing Profile section, provide clear indicators that the need for more accessible housing is increasing in importance in the context of affordable housing in Norfolk. Several stakeholders indicated during interviews that Norfolk is lacking in accessible and affordable housing and did not believe the supply was increasing at a fast enough pace to match the need.

Table 16: Disability and Age, 2019

	Norfolk		MSA		Virginia	
	With a disability	Percent with a disability	With a disability	Percent with a disability	With a disability	Percent with a disability
Under 18	2,577	5.4%	18,287	4.7%	75,519	4.1%
18-64	16,664	11.8%	113,943	11.1%	486,156	9.5%
Over 65	9,860	38.0%	85,274	34.4%	406,976	32.7%
Total civilian non-institutionalized population	29,101	13.5%	217,504	13.1%	968,651	11.8%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

At the same time, the portion of people with a disability is increasing. Given that this population may have accessible housing needs, this should be considered in analyzing housing stock.

Table 17: Disability Rate and Age, Norfolk, 2014 and 2019

	2014			2019		
	Number of people	With a disability	Percent with a disability	Number of people	With a disability	Percent with a disability
Under 18	50,199	2,592	5.2%	48,150	2,577	5.4%
18-64	146,827	15,532	10.6%	141,647	16,664	11.8%
Over 65	22,788	9,403	41.3%	25,948	9,860	38.0%
Total civilian non-institutionalized population	219,814	27,527	12.5%	215,745	29,101	13.5%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

B. Economic Data

This section provides an overview of economic trends in Norfolk including sections on income and poverty, low- and moderate- income, family income and poverty, and employment. The economic data assessment also shows the share of income across protected classes, which include race, color, national origin, religion, sex, familial status, and disability, as defined by the Fair Housing Act. Economic data provides insight into which populations are most vulnerable to shocks in the economy as well as changing housing and transportation cost and access.

i. Income and Poverty

This section examines the intersection between race, income, poverty, and family status, to understand access to opportunity.

Based on the U.S. Department of Health and Human Services 2019 Poverty Guidelines, the nationwide poverty level for a four-person household in 2019 was \$25,750.¹⁰ Compared to both the state and MSA, a higher share of Norfolk residents across all races and ethnicities lives below the poverty level (18.7 percent). Black or African American residents of Norfolk live in poverty at significantly higher rates (27 percent) than White residents (11.8 percent). While these poverty rates are higher than the MSA and state, the discrepancy between races is similar across geographies as evident in the table below.

¹⁰ ASPE Poverty Guidelines, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2019-poverty-guidelines>

Table 18: Poverty by Race and Ethnicity, 2019

	Race and Percentage of Each Race Living in Poverty		
	Norfolk	MSA	Virginia
Total poverty rate	18.7%	11.3%	10.6%
Race			
White alone	11.8%	7.4%	8.5%
Black or African American alone	27.0%	18.9%	17.6%
American Indian and Alaska Native alone	13.4%	8.9%	13.0%
Asian alone	13.0%	7.7%	7.3%
Native Hawaiian & Other Pacific Islander alone	10.2%	4.5%	7.6%
Some other race alone	21.1%	17.8%	16.5%
Two or more races	18.5%	11.7%	12.7%
Ethnicity			
Hispanic or Latino origin (of any race)	19.9%	15.8%	14.0%
White alone, not Hispanic or Latino	11.4%	7.0%	8.2%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

There is significant income inequality in terms of both median income by race and percent of residents living below poverty level in Norfolk. Households who are White, Asian, and Native Hawaiian or Other Pacific Islander earn a median household income that is on average about ten to twenty thousand more than households who are Black or African American, some other race, and two or more races. On average, White alone, not Hispanic or Latino, households had a median income that was \$12,000 higher than Hispanic or Latino households in 2011. In both 2014 and 2019, Black or African American-led households experienced the highest level of poverty, 27 percent in 2019, and the lowest median income, \$35,109 in 2019. At the same time, the median income has increased and the percent living below poverty level has decreased in every racial and ethnic group except for Native Hawaiian and Other Pacific Islander. This group, however, numbers below one hundred and small deviations in income have substantial impact on the overall median numbers.

Table 19: Income and Poverty by Race and Ethnicity in Norfolk, 2011 v. 2019

Race of Householder	2014		2019	
	Median Income	Percent below poverty level	Median Income	Percent below poverty level
White	\$ 55,059	14.1%	\$ 65,712	11.8%
Black or African American	\$ 32,630	27.5%	\$ 35,109	27.0%
American Indian and Alaska Native	\$ 43,986	22.5%	-	13.4%
Asian	\$ 53,026	14.5%	\$ 54,871	13.0%

Native Hawaiian & Other Pacific Islander	\$ 68,039	0.0%	\$ 58,836	10.2%
Some other race	\$ 38,182	28.2%	\$ 50,100	21.1%
Two or more races	\$ 37,287	21.2%	\$ 52,607	18.5%
Hispanic or Latino origin (of any race)	\$ 41,838	20.9%	\$ 54,081	19.9%
White alone, not Hispanic or Latino	\$ 55,986	13.7%	\$ 66,454	11.4%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

In the past decade, Norfolk households have become wealthier with 32.3 percent of households making more than \$75,000 in comparison to 25.4 percent of households making more than that amount in 2014. Similarly, median income has increased from \$43,914 to \$51,590 in the last decade. Mean household income has increased from \$59,861 to \$72,315 showing that there is an income skew from wealthier households. At the same time, about a quarter of households make less than \$25,000 and may struggle to find adequate and affordable housing.

Table 20: Household Income 2014 v. 2019

	2014		2019	
	Estimate	Percent	Estimate	Percent
Total households	86,397	100%	88,353	100%
Less than \$10,000	8,294	9.6%	7,915	9.0%
\$10,000 to \$14,999	5,443	6.3%	4,674	5.3%
\$15,000 to \$24,999	10,368	12.0%	8,951	10.1%
\$25,000 to \$34,999	10,627	12.3%	9,319	10.5%
\$25,000 to \$34,999	13,564	15.7%	11,859	13.4%
\$50,000 to \$74,999	16,243	18.8%	17,070	19.3%
\$75,000 to \$99,999	8,640	10.0%	10,897	12.3%
\$100,000 to \$149,999	8,208	9.5%	10,063	11.4%
\$150,000 to \$199,999	2,937	3.4%	3,961	4.5%
\$200,000 or more	2,160	2.5%	3,644	4.1%
Median household income (dollars)	\$ 44,150		\$ 51,590	
Mean household income (dollars)	\$ 59,861		\$ 72,315	

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

ii. Low to Moderate Income

HUD uses low- and moderate-income (LMI) households as a threshold for many federal programs covered as part of the City's Analysis of Impediments and Consolidated Plan. HUD defines LMI as households earning under 80 percent Area Median Income (AMI). As described by the Federal Reserve Bank of St. Louis, such thresholds and definitions continue to matter as structural barriers continue to contribute to generational poverty and limit job mobility,

education, access to capital, availability of affordable housing, and mobility of LMI communities in the country.¹¹ As of 2015, Norfolk has the highest percent of LMI households (54.9 percent) of any city in the metropolitan statistical area.

Table 21: Low- and Moderate- Income Persons, 2015

	Total Low- and Moderate- Income Persons	Percent of Low- and Moderate- Income Persons in the Jurisdiction
Chesapeake	70,140	31.3%
Hampton	62,910	47.4%
Newport News	86,060	49.8%
Norfolk	120,970	54.9%
Portsmouth	47,680	51.1%
Suffolk	30,470	35.7%
Virginia Beach	148,305	33.9%

Source: American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data (HUD FY21)

Table 22 provides a summary of the LMI population in 2018 and compares Norfolk to the commonwealth. In 2018, Norfolk's share of LMI population decreased slightly since 2015 but is 15 percent higher than Virginia's share. Out of 88,150 households reported in Norfolk, almost half (49 percent) of households live below 80 percent of HUD's AMI and 31 percent are considered very low-income with incomes at or below 50 percent AMI. Almost one in five Norfolk households are classified as extremely low-income with incomes at 30 percent AMI or less.

Table 22: Area Median Income by Households, 2018

Income Distribution	Norfolk		Virginia	
	Count	Percent	Count	Percent
0-30 percent AMI	16,080	18%	338,030	11%
30-50 percent AMI	11,550	13%	312,375	10%
50-80 percent AMI	15,745	18%	406,525	13%
80-100 percent AMI	9,870	11%	302,285	10%
>100% AMI	34,905	40%	1,769,200	57%
Total	88,150	100%	3,128,415	100%

Source: Comprehensive Affordable Housing Strategy Data, 2014-2018

¹¹ "The Issues Facing Low- and Moderate-Income Communities", St.Louis Fed, <https://www.stlouisfed.org/on-the-economy/2016/january/issues-low-moderate-income-households-communities>

Such data demonstrates the need for Norfolk to ensure that affordable units are available for low-income, very low-income, and extremely low-income households.

iii. Family Income and Poverty

According to the Census, families are households that consists of those related to each other by birth, marriage, or adoption. Households are the larger measure including both families and any household of unrelated people living together.¹² In Norfolk, families with children are most likely to experience poverty. In 2019, 23 percent of all families with children under 18 years of age in Norfolk had incomes below the poverty level, in comparison to 14 percent of all families. The percentage is even higher for female-headed households with children under 18 years of age in Norfolk, at 42.6 percent. This is also the highest percentage across the compared geographies. Norfolk households experience poverty at higher levels across all familial configuration categories compared to the state and MSA.

Table 20: Family Type by Income Below Poverty Level, 2019

Family Type	Virginia	MSA	Norfolk
All families	7.1%	8.0%	14.0%
With related children of householder under 18 years	11.2%	13.4%	23.0%
Married-couple family	3.2%	2.9%	4.6%
With related children of householder under 18 years	4.2%	4.1%	6.7%
Families with Female householder, no husband present	22.7%	24.1%	31.8%
With related children of householder under 18 years	31.5%	32.8%	42.6%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Between 2014 and 2019, the number of families living below the poverty line decreased from 15.8 percent to 14 percent. Table 21 shows that the share of families in poverty decreased across all categories in Norfolk.

Table 21: Family Type by Income Below Poverty Level, Norfolk, 2014-2019

Family Type	2014	2019
All families	15.8%	14.0%
With related children of householder under 18 years	24.4%	23.0%
Married-couple family	5.2%	4.6%
With related children of householder under 18 years	7.2%	6.7%
Families with Female householder, no husband present	35.9%	31.8%
With related children of householder under 18 years	45.2%	42.6%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

¹² Census Families and Households Glossary, <https://www.census.gov/topics/families/families-and-households/about/glossary.html>

iv. Employment

According to the US Census Bureau's 5-year American Community Survey estimates, in 2019, Norfolk had the highest unemployment rate compared to the region and state at 7.6 percent. The city's labor force participation rate, however, was higher than the MSA and state.

Table 22: Labor Force Statistics, 2019

Labor Category	Virginia		MSA		Norfolk	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Population 16 years and over	6,799,060		1,414,928		201,040	
In labor force	4,477,253	65.9%	944,898	66.8%	140,204	69.7%
Civilian labor force	4,356,868	64.1%	862,878	61.0%	113,626	56.5%
Employed	4,156,018	61.1%	814,519	57.6%	104,945	52.2%
Unemployment Rate		4.6%		5.6%		7.6%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

Norfolk's unemployment rate declined from 11.6 percent in 2014 to 7.6 percent in 2019. A declining unemployment rate is one indicator of the health of the city's economy but does not reflect job quality or show differences across income levels. While Norfolk experienced a significant drop in unemployment during the period between 2014 and 2019, this rate was in line with national trends, where unemployment rates hit 20-year lows in 2019, only to rise rapidly in 2020 at the start of the COVID-19 pandemic.¹³

Table 23: Labor Force Statistics, Norfolk, 2014-2019

Employment Status	2014	2019
Population 16 years and over	199,157	201,040
Labor Force Participation Rate	57.7%	69.7%
Employed	51.0%	52.2%
Unemployment rate	11.6%	7.6%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

Unemployment is higher in Norfolk for every protected class except "some other race" and "Hispanic," compared to the MSA and Virginia. Unemployment across the protected classes in Norfolk and the surrounding areas reveals the disparities in income and poverty across race and ethnicity. In 2019, the city's Black or African American population had the highest unemployment rate across protected classes with 11.1 percent unemployment, followed by

¹³ Bureau of Labor Statistics: <https://www.bls.gov/charts/employment-situation/civilian-unemployment-rate.htm>

Asian and Hispanic populations. Females in the labor force also had a slightly higher unemployment rate than males in every compared geography, with the most disparate inequality in Norfolk where the female unemployment rate was 0.9 percent higher than male unemployment.

Table 23: Unemployment and Protected Class, 2019

Category	Virginia	MSA	Norfolk
Category	Unemployment rate	Unemployment rate	Unemployment rate
Civilian Labor Force	4.6%	5.6%	7.6%
Male	4.1%	5.1%	6.7%
Female	4.3%	5.2%	7.6%
White	3.9%	4.2%	5.0%
Black or African American	7.3%	8.3%	11.1%
Asian	3.3%	3.4%	4.5%
Some other race*	5.1%	4.1%	3.6%
Hispanic**	4.7%	5.3%	4.8%

Source: US Census Bureau, 2015-2019 American Community Survey. *Does not include Native American/Hawaiian/Pacific Islander **Hispanic ethnicity is counted independently of race

Between 2014 and 2019, the unemployment rate decreased for every protected class in Norfolk. As stated earlier, overall unemployment rate decreased from 11.6 percent in 2014 to 7.6 percent in 2019.

Table 24: Unemployment and Protected Class, Norfolk, 2014 & 2019

Category	2014	2019
Category	Unemployment rate	Unemployment rate
Civilian Labor Force	11.6%	7.6%
Male	11.1%	6.7%
Female	10.3%	7.6%
White	8.6%	5.0%
Black or African American	14.9%	11.1%
Asian	5.9%	4.5%
Some other race*	11.1%	3.6%
Hispanic**	9.0%	4.8%

Source: US Census Bureau, 2015-2019 American Community Survey *Does not include Native American/Hawaiian/Pacific Islander **Hispanic ethnicity is counted independently of race

Educational services, and healthcare, and social assistance makes up the highest share of employment in Norfolk at 23.1 percent. This is followed by arts, entertainment, and recreation, and accommodation and food services (12.8 percent), professional, scientific, and

management, and administrative and waste management services (11.7 percent), and retail trade (11.2 percent). This reflects the city's position as an educational hub for the region with five universities: Old Dominion University, Eastern Virginia Medical School, Norfolk State University, Virginia Wesleyan College, and Tidewater Community College; and numerous hospitals: Sentara Norfolk General Hospital, Sentara Leigh Hospital, Bon Secours DePaul Medical Center, Children's Hospital of The King's Daughters and Lake Taylor Transitional Care Hospital.

Table 25: Employment by Industry, 2019

Industry	City of Norfolk		Virginia	
Civilian employed population 16 years and over	104,945		3,002,632	
Agriculture, forestry, fishing and hunting, and mining	136	0.1%	27,075	0.9%
Construction	7,320	7.0%	213,322	7.1%
Manufacturing	7,406	7.1%	256,754	8.6%
Wholesale trade	1,723	1.6%	61,570	2.1%
Retail trade	11,758	11.2%	252,082	8.4%
Transportation and warehousing, and utilities	5,165	4.9%	142,409	4.7%
Information	1,804	1.7%	62,605	2.1%
Finance and insurance, and real estate and rental and leasing	6,005	5.7%	217,469	7.2%
Professional, scientific, and management, and administrative and waste management services	12,262	11.7%	501,941	16.7%
Educational services, and health care and social assistance	24,213	23.1%	620,857	20.7%
Arts, entertainment, and recreation, and accommodation and food services	13,414	12.8%	172,926	5.8%
Other services, except public administration	4,595	4.4%	140,480	4.7%
Public administration	9,144	8.7%	333,142	11.1%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

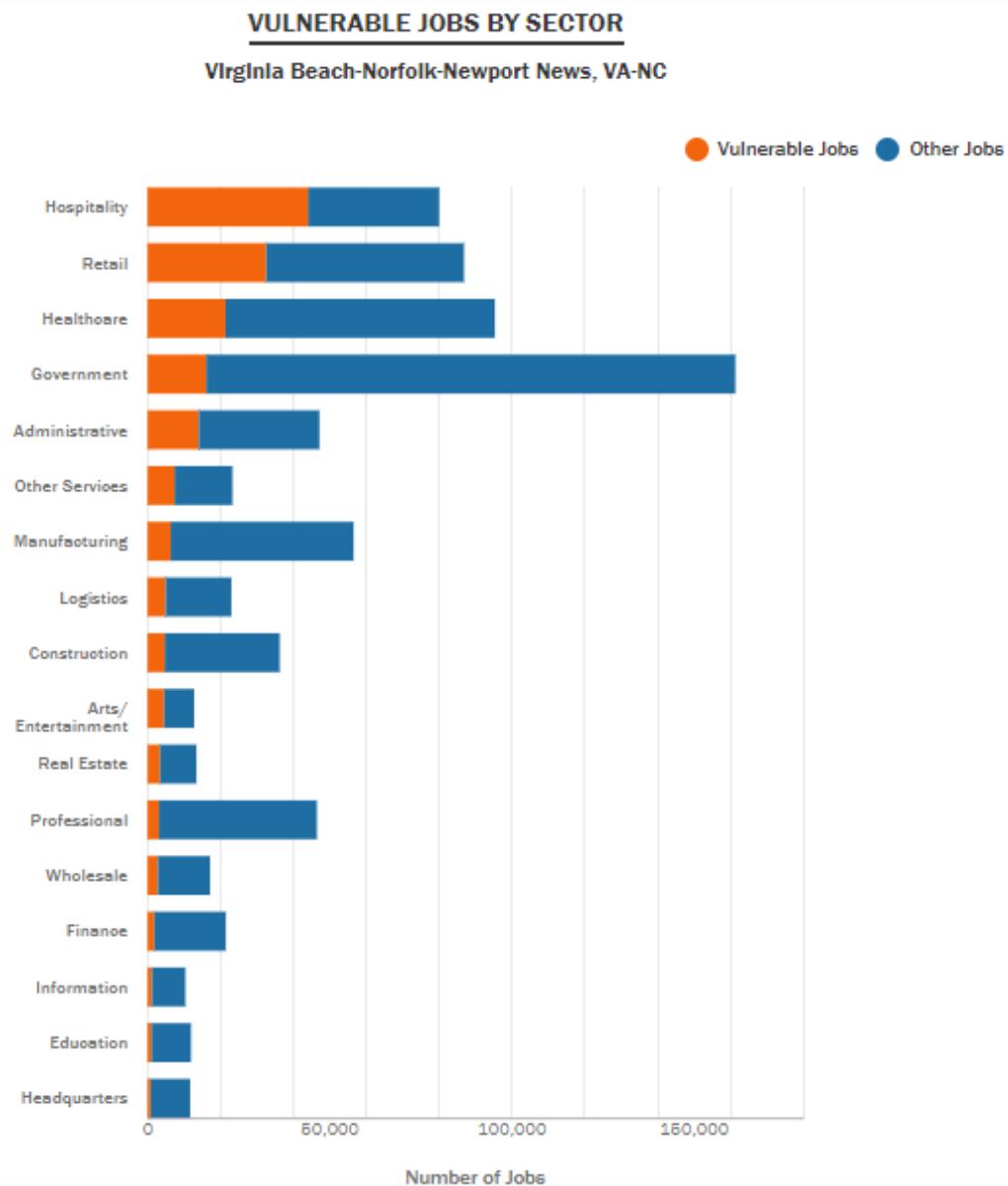
As shown in Table 26, from 2014 to 2019, Norfolk saw a decrease in jobs related to construction, retail, other services and public administration jobs. At the same time, there were notable increases in manufacturing jobs, finance and insurance, and real estate and rental and leasing, and professional, scientific, and management, and administrative and waste management services. The arts, entertainment, and recreation, and accommodation and food services industry saw higher absolute and proportional job gains from 2014 to 2019, adding approximately 2,500 jobs and increased from 10.8 percent of jobs in 2014 to 12.8 percent of jobs in 2019. It should be noted that most employment statistics specifically measure "civilian" employment, which could complicate an assessment of Norfolk due to the presence of the largest naval station in the world and its large non-civilian population.

Table 26: Employment by Industry, Norfolk, 2014 & 2019

Industry	2014		2019	
	Estimate	Percent	Estimate	Percent
Civilian employed population 16 years and over	101,648		104,945	
Agriculture, forestry, fishing and hunting, and mining	261	0.3%	136	0.1%
Construction	7,534	7.4%	7,320	7.0%
Manufacturing	6,667	6.6%	7,406	7.1%
Wholesale trade	1,779	1.8%	1,723	1.6%
Retail trade	12,748	12.5%	11,758	11.2%
Transportation and warehousing, and utilities	4,880	4.8%	5,165	4.9%
Information	1,631	1.6%	1,804	1.7%
Finance and insurance, and real estate and rental and leasing	5,309	5.2%	6,005	5.7%
Professional, scientific, and management, and administrative and waste management services	10,849	10.7%	12,262	11.7%
Educational services, and health care and social assistance	23,767	23.4%	24,213	23.1%
Arts, entertainment, and recreation, and accommodation and food services	10,991	10.8%	13,414	12.8%
Other services, except public administration	5,474	5.4%	4,595	4.4%
Public administration	9,758	9.6%	9,144	8.7%

Source: US Census Bureau, 2010-2014 and 2015-2019, ACS 5-Year Estimates

According to a Brookings Institution data visualization tool (Figure 8, next page), Virginia Beach-Norfolk-Newport News, VA-NC MSA has 22.7 percent “vulnerable jobs”, which is about 3.2 percent higher than the United States. Brookings Institutes defines “vulnerable jobs” as jobs that 1) pay low wages (less than the median wage for the location), and 2) do not provide employer-sponsored healthcare. In the MSA, most of those vulnerable jobs are in hospitality and retail.

Figure 8: Number of Vulnerable Jobs for Each Sector Norfolk

Source: Brookings Institution, data used to create this visualization comes from the 2018 American Community Survey, 2018 and 2019 Occupational Employment Statistics, and Emsi.

V. Housing Profile

Key Data and Insights:

- Norfolk's housing stock is more diverse than the state, however, much of the missing middle housing stock is declining and being replaced by predominantly large apartment buildings and single-family housing. (B)
- Just under 41 percent of renters in Norfolk are housing cost burdened, paying 30 percent or more of their income for monthly housing costs. Black or African American households are most likely to be significantly housing cost-burdened in Norfolk. (H)
- Norfolk has one of the highest eviction rates in the country and stakeholders worry that the pandemic likely exacerbated the impacts of the eviction crisis. (J)
- Racial disparities exist in foreclosed housing in Norfolk with the majority of foreclosures occurring in majority Black census tracts. A New America study found that foreclosures in Norfolk most often happen in neighborhoods with more single parent households and more reliance on public transit. (I)
- Norfolk has an aging housing stock with 50.6 percent of housing built before 1959. This poses a greater need to tackle challenges related to housing repair, weatherization, health issues, and lead paint remediation. (A.ii)
- The Comprehensive Plan mostly requires apartments to be built on collector or arterial roads. Yet, pollution from areas with high volumes of traffic may exacerbate exposure to air pollution so placing apartments on arterials can put renters at greater risk of health and safety problems. While not uncommon across the US, policies that concentrate housing in polluted areas should be examined. (B)
- Norfolk's housing stock is generally growing based on a review of building permits over time. At the same time, stakeholders indicated during interviews that the housing market is extremely competitive among buyers and renters with multiple tenant applications for every unit. If true, this competition for rental housing could pose a barrier for all renters, but particularly those with housing choice vouchers. (X.D.i)
- Norfolk has a strong presence of military and veteran populations and accommodates five college campuses, all of which may draw more absentee landlords and large property management companies to the region. (VI.E)

City of Norfolk Actions:

- The Department of Neighborhood Services stood up the Norfolk Eviction Prevention Center to connect Norfolk residents facing eviction with funding and resources to mitigate immediate relief needs and stabilize households to reduce the risk in the long term. Resource clinics were held in December 2021 and May 2022. This effort was made possible with approximately \$1.3 million of state and local funding.

- As of February 2022, the Virginia Rent Relief Program distributed over \$48 Million in rent relief to more than 7,000 Norfolk households since launching in June 2020. It is designed to support and ensure housing stability across the commonwealth during the coronavirus pandemic.
- The City of Norfolk runs an owner-occupied rehabilitation program to provide financial assistance to low-income homeowners for necessary interior and exterior repairs. Properties are rehabilitated to provide safe and sanitary housing and/or improve accessibility for seniors or persons with mobility impairments. The goal of each rehabilitation is to reduce ongoing and future maintenance costs and create decent, affordable housing for City of Norfolk residents.
- In July 2021, Norfolk City Council approved a Missing Middle Pattern Book to provide free designs for ‘middle housing’ including duplexes, quadplexes, and “Norfolk six-packs.” This plan book is designed to encourage more housing diversity, especially options that lie between single-family detached homes and large apartment buildings. Missing Middle Housing delivers multiple units on the same size lot as a single-family home, therefore allowing distribution of land costs across multiple units, making them inherently more affordable. Because the units are often smaller than conventional single-family housing, they are less expensive to build.

A. Housing Stock

The following review of Norfolk’s housing stock provides a snapshot of housing development patterns and trends. The following sections provide key metrics of the local housing stock.

i. Housing Units

The number of housing units in Norfolk increased from 94,995 in 2010 to 97,670 in 2019, indicating a growth rate of 2.8 percent. This is a smaller growth rate than both the state and the MSA, but at the same time population in Norfolk decreased while the MSA and state population increased.

Table 27: Number of Housing Units in Norfolk

Housing units	Norfolk	MSA	Virginia
Units in 2010	94,995	680,167	3,315,739
Units in 2019	97,670	735,011	3,514,032
% Change	2.8%	8.1%	6.0%

Source: US Census Bureau, 2006-2010 and 2015-2019 American Community Survey 5-Year Estimates

ii. Age of Housing Stock

About 12.5 percent of all housing was built since 2000, while 46.6 percent of housing was built before 1959. The age of housing was a common theme among stakeholder interviews, where interviewees indicated high costs of maintenance for owners and deferred maintenance issues for renters.

Table 28: Age of Housing Stock, Norfolk, 2019

Year Housing Built	Number	Percent
Built 2014 or later	2,240	2.3%
Built 2010 to 2013	2,020	2.1%
Built 2000 to 2009	7,907	8.1%
Built 1990 to 1999	5,937	6.1%
Built 1980 to 1989	10,387	10.6%
Built 1970 to 1979	11,342	11.6%
Built 1960 to 1969	12,280	12.6%
Built 1950 to 1959	19,608	20.1%
Built 1940 to 1949	11,252	11.5%
Built 1939 or earlier	14,697	15.0%
Total housing units	97,670	

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

B. Housing Type

Between 2014 and 2019, Norfolk's total housing units increased by 1,971 units. The 2011 Analysis of Impediments showed that Norfolk experienced a net loss of over 6,600 units between 1990 and 2009, a decrease of 6.7 percent of its stock. Therefore, the recent shift to increasing housing supply is a change from the previous Analysis of Impediments.

Between 2014 and 2019, the amount and proportion of 20 or more-unit apartments increased substantially by almost two thousand units. Single family housing and duplexes increased slightly, and all other housing types decreased. Smaller apartment complexes between 5 and 19 units decreased in number indicating perhaps an aging housing stock that is not conforming with the zoning ordinance. Most missing middle housing types decreased proportionally to total housing stock.¹⁴

¹⁴ Missing middle housing refers to housing types such as duplexes, triplexes, fourplexes, and cottage courts that sit between single-family homes and mid-rise multi-family buildings in terms of unit density and scale. The City of Norfolk conducted a missing middle study and produced a Missing Middle Pattern Book to inform neighborhood development in 2021. <https://www.norfolk.gov/DocumentCenter/View/66555/MissingMiddlePatternBook>

Table 29: Housing Type, Norfolk, 2014 v. 2019

Housing Type	2014		2019	
Total housing units	95,699		97,670	
1-unit, detached	46,885	49%	48,053	49.2%
1-unit, attached	7,895	8.2%	7,216	7.4%
2 units	5,535	5.8%	5,933	6.1%
3 or 4 units	7,399	7.7%	7,541	7.7%
5 to 9 units	11,218	11.7%	10,859	11.1%
10 to 19 units	6,978	7.3%	6,418	6.6%
20 or more units	8,921	9.3%	10,849	11.1%
Mobile home	859	0.9%	777	0.8%
Boat, RV, van, etc.	9	0%	24	0%
Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates				

Compared to Virginia, Norfolk has a smaller proportion of 1-unit attached and detached housing and a larger proportion of small apartment buildings. While Norfolk has more diverse housing options than the rest of the state, only 25.7 percent of the housing stock is a housing type outside of single family or large apartment building.

Table 30: Housing Type Norfolk and Virginia

	Virginia		Norfolk	
	Estimate	Percent	Estimate	Percent
1 unit, detached	1,959,547	62.2%	48,053	49.2%
1 unit, attached	361,659	11.5%	7,216	7.4%
2 units	47,876	1.5%	5,933	6.1%
3 or 4 units	83,984	2.7%	7,541	7.7%
5 to 9 units	145,792	4.6%	10,859	11.1%
10 or more units	412,196	13.1%	17,267	17.7%
Mobile home or other type of housing	139,991	4.4%	801	0.8%
Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates				

Within Norfolk, 66.5 percent of the total housing stock are two- and three-bedroom homes. Since 2014, the proportion of one-bedroom and two-bedroom units decreased and the proportion of four- and five-bedroom units increased. Studios with no bedrooms and five- or more- bedroom units only comprise 5.4 percent of the total housing stock. One- and Two-bedroom homes were the only housing stock that decreased in total number. Four-bedroom units saw the biggest increase of 0.7 percent in proportion and a 1,043-unit increase.

Table 31: Number of Bedrooms, Norfolk, 2014 & 2019

Bedrooms	2014		2019	
	Estimate	Percent	Estimate	Percent
Total housing units	95,699		97,670	
No bedroom	1,938	2.0%	2,063	2.1%
1 bedroom	13,839	14.5%	13,362	13.7%
2 bedrooms	30,833	32.2%	30,811	31.5%
3 bedrooms	33,416	34.9%	34,051	34.9%
4 bedrooms	13,069	13.7%	14,112	14.4%
5 or more bedrooms	2,604	2.7%	3,271	3.3%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

C. Housing Vacancy and Blight

Vacancy status is used as an indicator of a region's housing market and provides information on the stability and neighborhood quality of life. Measuring vacancy provides insight into the demand for housing and housing turnover within areas, and it helps us to better understand the housing market over time.

Between 2014 and 2019, the housing stock in Norfolk increased by 1,971 units. During the same time the number of vacant units increased by 15 units but the percent of vacant units in comparison to all housing units decreased from 9.7 percent to 9.5 percent. Vacant housing units include all units, including both rental and owner-occupied units.

Table 32: Housing Occupancy, Norfolk, 2014-2019

Housing Occupancy	2014		2019	
	Estimate	Percent	Estimate	Percent
Total housing units	95,699		97,670	
Occupied housing units	86,397	90.3%	88,353	90.5%
Vacant housing units	9,302	9.7%	9,317	9.5%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates

The proportion of vacant housing units in Norfolk exceeds that of the MSA by 1.9 percent and that of the state by 1.3 percent. Within the region, the MSA had the least vacant housing units, (7.6 percent). Overall, Norfolk has a somewhat higher vacancy rate of 9.5 percent. A healthy rental vacancy rate typically hovers around 7 to 8 percent, and a healthy homeowner vacancy rate is typically much lower at 2 percent or below. A vacancy rate of above 12 percent is considered high, and above 20 percent is considered hyper-vacancy.

Table 33: Housing Occupancy, 2019

Housing Occupancy	Virginia		MSA		Norfolk	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total Units	3,618,247		760,076		97,670	
Occupied	3,321,218	91.8%	702,160	92.4%	88,353	90.5%
Vacant	297,029	8.2%	57,916	7.6%	9,317	9.5%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Analyzing the vacancy of Norfolk's approximately 9,317 units reveals that the highest categories of vacancy are vacant rental units and vacant "other" units. In the census, "vacant" is defined as when no one is living in the unit at the time of the annual survey, unless the absence is only temporary¹⁵. Norfolk has a much higher proportion of vacant rental units at 37.5 percent of all vacancies than both the MSA (27.7 percent) and Virginia (17.2 percent). Norfolk has a much lower proportion of "seasonal, recreational, or occasional use" vacancies at 5.9 percent of all vacancies compared to the MSA (19.3 percent) and Virginia (24.1 percent). This indicates that the burden of vacation rentals and other short-term rentals on the housing supply may not be as large a threat as the surrounding areas.

Vacant housing units are classified by the U.S. Census as "other vacant" when a vacant unit does not fall into any of the other specified categories at the time of the annual survey. The Census Bureau indicates that some common reasons for this type of unit may be an owner who does not want to rent or sell, an owner using a home as storage, a unit that the owner is preparing to sell, or an elderly owner who lives in a nursing home or with family and leaves their unit vacant. It could also indicate a home being foreclosed, held in settlement, or repaired.¹⁶ Additionally, the large temporary military population relocating to and from Naval Station Norfolk could influence vacancy statistics.

¹⁵ Census.gov Housing Definitions, <https://www.census.gov/housing/hvs/definitions.pdf>

¹⁶ Definition of "Other" Vacant Housing Units, <https://www.census.gov/housing/hvs/files/qtr113/PAA-poster.pdf>

Table 28: Housing Occupancy, 2019

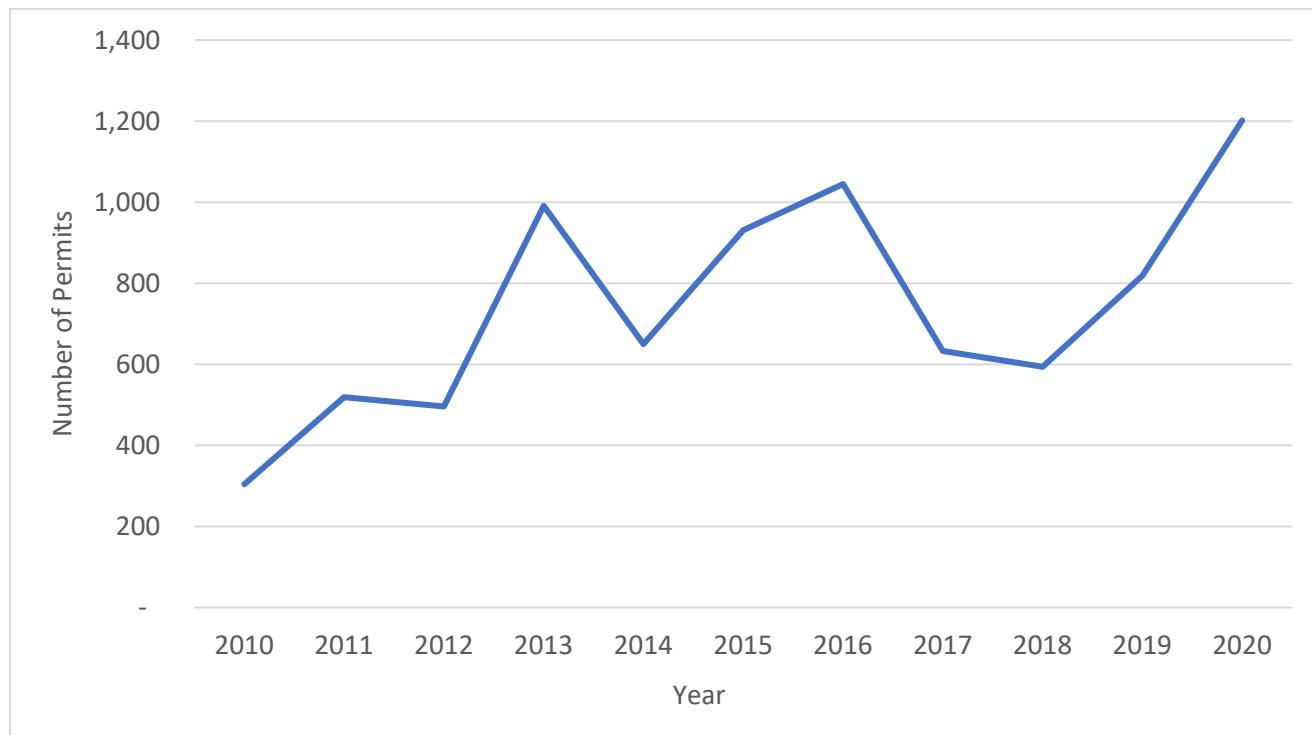
	Norfolk		MSA		Virginia	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total Vacancy	9,317		71,190		362,987	
For rent	3,492	37.5%	19,736	27.7%	62,285	17.2%
Rented, not occupied	613	6.6%	3,577	5.0%	18,330	5.0%
For sale only	1,169	12.5%	8,396	11.8%	31,732	8.7%
Sold, not occupied	102	1.1%	2,486	3.5%	13,074	3.6%
For seasonal, recreational, or occasional use	549	5.9%	13,712	19.3%	87,550	24.1%
For migrant workers	-	0.0%	47	0.1%	550	0.2%
Other vacant	3,392	36.4%	23,236	32.6%	149,466	41.2%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

D. Building Permits

The number of building permits issued for new housing units annually provides a snapshot of housing demand. Since 2010, housing construction in Norfolk has increased but at an inconsistent rate. While recovering from the national housing crisis in 2010, Norfolk experienced a sharp decrease in housing permits, approving only 304 residential building permits, about 800 fewer permits than 2009. Housing construction fluctuated between 2010 through 2013, declined in 2014, increased between 2014 and 2016, declined between 2016 and 2018, and increased between 2018 and 2020. Permits peaked in 2020 with 1,202 permits approved. While the number of permits has increased in the past few years, the volatility of the last decade makes it difficult to predict future housing production.

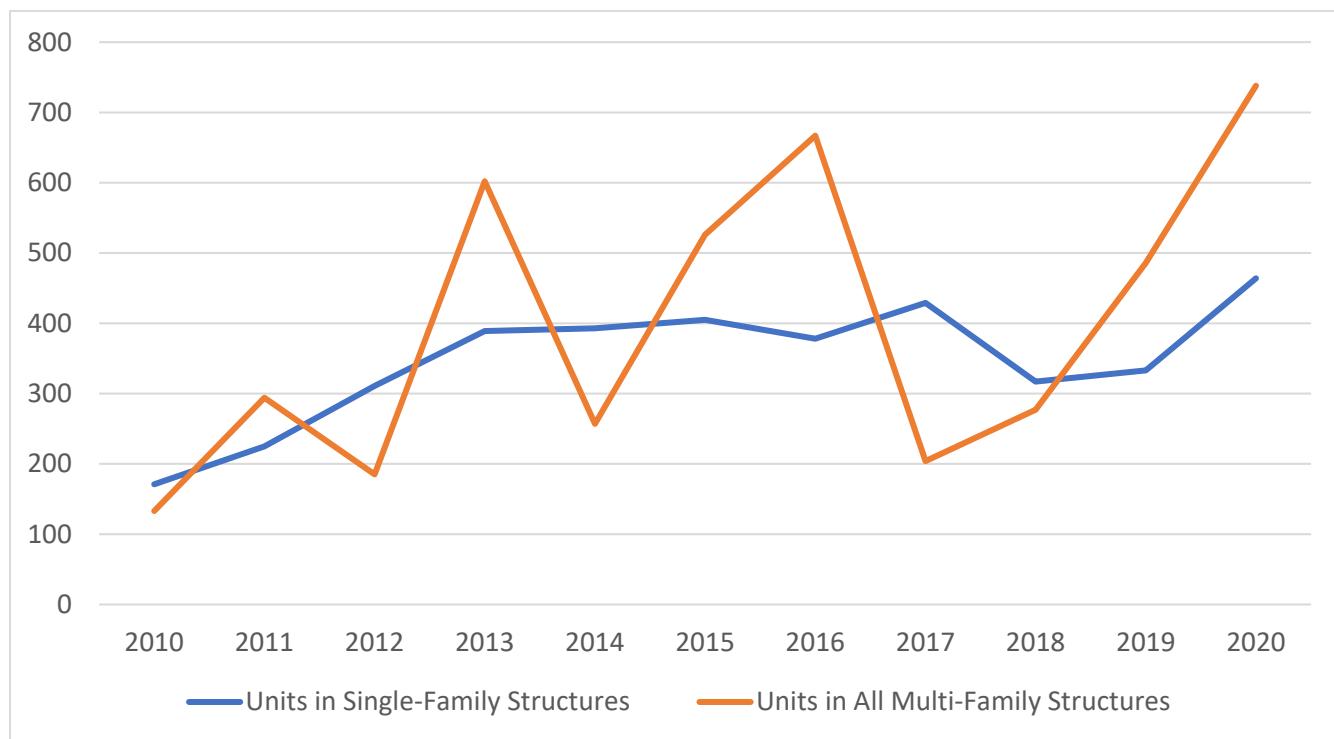
Figure 9: Total Housing Units, Single- and Multi-family, Building Permits, Norfolk, 2010-2020.



Source: State of the Cities Data Systems (SOCDS), Building Permits Database, 2010-2020.

While overall housing construction has been fluctuating, single family permits have been more predictable while multi-family permits have peaked and declined by as much as about 500 units between years. The difference between years could be a result of the large size of redevelopment projects, where a large building's worth of units become available at the same time. For single family construction, there was an increase year to year following the national housing crisis until 2015 to 2016 which saw a small decline, and 2017 to 2018 which saw a decrease of 429 to 317 permits. Since 2018, single-family housing construction has increased.

The past seven years have seen single-family building permits trend around 400 permits a year. For multi-family housing every year or two-year period of growth is followed by sharp decreases in housing permits. 2020 saw the sharpest increase in multi-family building permits with a peak of 738 permits. For only four of the past eleven years, the number of multi-family building permits has been less than single family building permits. Because of the unpredictable nature of multi-family building permits, it is difficult to predict multi-family construction in the coming years.

Figure 10: Total Single and Multi-family Building Permits, Norfolk, 2010 – 2020.

Source: State of the Cities Data Systems (SOCDS), Building Permits Database, 2010 – 2020.

Multi-family housing has increased significantly mostly through construction of five- or more-unit multi-family housing development. Multi-family housing represented 53.4 percent of all new residential construction between 2010 and 2020. Multi-family housing with five or more units comprised 98.4 percent of all multi-family housing between 2010 to 2020, while two-to-four-unit family structures, comprised just 1.6 percent.

Table 29: Multi-family Housing Unit Building Permits, Norfolk, 2010 - 2020

	Number of units	Percent of units
Units in All Single-Family Structures	3,815	46.6%
Units in All Multi-Family Structures	4,369	53.4%
Units in 2-unit Multi-Family Structures	124	1.5%
Units in 3- and 4-unit Multi-Family Structures	12	0.1%
Units in 5+ unit Multi-Family Structures	4,233	51.7%

Source: State of the Cities Data Systems (SOCDS), Building Permits Database, 2010 – 2020.

E. Median Home Value

According to the U.S. Census Bureau, in 2019 the median home value in Norfolk was \$206,700 which is nearly \$40,000 less than the median home value of the surrounding MSA and about \$70,000 less than the median home value of the state overall, which could indicate that Norfolk has more affordable homeownership opportunities than surrounding areas.

From 2014 to 2019, home values in the City of Norfolk increased by 5.1 percent, compared to the MSA which increased 3.9 percent, but less than the state, which experienced growth of 11.4 percent.

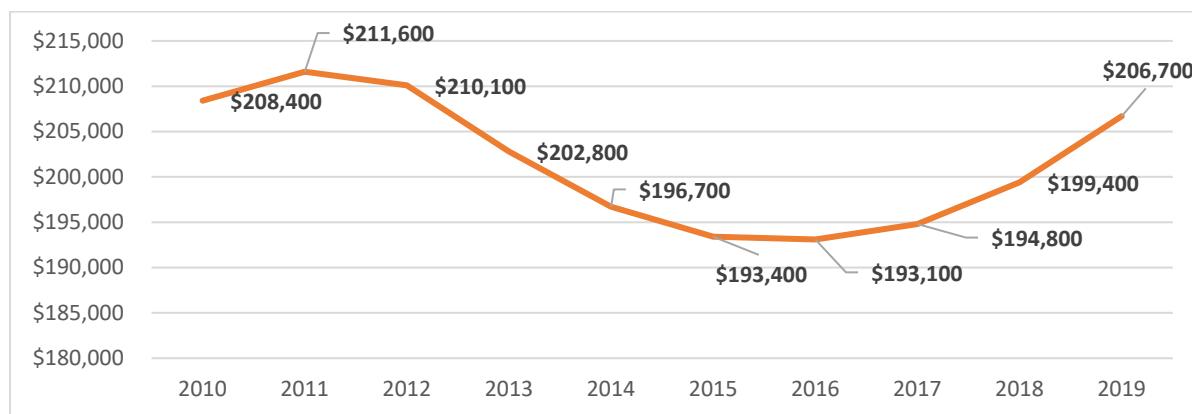
Table 30: Median Home Value, 2014 and 2019

Jurisdiction	Year		Percent Change
	2014	2019	
Norfolk	\$ 196,700	\$ 206,700	5.1%
MSA	\$ 235,900	\$ 245,100	3.9%
Virginia	\$ 245,100	\$ 273,100	11.4%

Source: US Census Bureau, 2010-2014 and 2015-2019 American Community Survey 5-Year Estimates.

Between 2010 and 2019, the median value of owner-occupied units in Norfolk fluctuated, but the 2019 value is slightly less than the 2010 median home value. Norfolk's median housing value steadily decreased from 2011 to 2016 but has steadily increased since 2016, despite being lower than its peak at \$211,600 in 2011. The year between 2018 and 2019 saw the largest increase in home value over the last decade at \$7,300 in a year.

Figure 11: Median Value of Owner-Occupied Housing Units, Norfolk, 2010 - 2019



Source: US Census Bureau, 2006-2010, 2007-2011, 2008-2012, 2009-2013, 2010-2014, 2011-2015, 2012-2016, 2013-2017, 2014-2018, and 2015-2019 American Community Survey 5-Year Estimates.

F. Monthly Housing Cost

Monthly housing costs are defined by the US Census Bureau to include monthly rent or mortgage payments, and utilities including water, sewer, and electricity. The table below describes the monthly housing costs for the owner and renter-occupied housing units in Norfolk and in the region. Compared to the region, Norfolk has a lower median cost by about \$100. Norfolk also has significantly fewer households paying \$2,500 or more in monthly costs.

The median monthly housing cost in Norfolk is \$1,153, compared to the MSA at \$1,289 and the state at \$1,293. In Norfolk, approximately 48.9 percent of residents have monthly housing costs between \$1,000 and \$2,500. Norfolk has a higher share (29.2 percent) of monthly housing costs in the \$500 to \$1,000 range than the MSA (22.6 percent) and the state (22 percent). It should be acknowledged that Norfolk has more public housing units and housing choice vouchers than any other city in the region which may account for the higher proportion of less expensive housing.

Table 31: Monthly Housing Cost, 2019

Costs	Virginia		MSA		Norfolk	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Less than \$500	441,448	14.0%	66,177	10.0%	8,593	9.7%
\$500 to \$999	694,030	22.0%	149,962	22.6%	25,801	29.2%
\$1,000 to \$2,500	1,199,756	38.1%	321,889	48.5%	43,203	48.9%
\$2,500 or more	760,869	24.1%	117,100	17.6%	9,773	11.1%
Median cost	\$ 1,293		\$ 1,289		\$ 1,153	

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

i. Monthly Housing Cost as a Percentage of Household Income

Housing cost as a percentage of income highlights the often-precarious balance between housing costs and livable wages. People who spend more than 30 percent of household income on housing costs are considered cost burdened according to HUD.¹⁷ The Census defines homeowner housing costs to include property taxes, insurance, energy payments, water, and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, housing costs include monthly rent, electricity, and natural gas energy charges.

Table 32 shows that persons with lower incomes spend a higher percentage of their income on housing. For example, 85 percent of households making less than \$20,000 and 79.6 percent of

¹⁷ "Housing Cost Burden Among Housing Choice Voucher Participants" HUD User, <https://www.huduser.gov/portal/pdredge/pdr-edge-research-110617.html>

households making between \$20,000 and \$34,999 in Norfolk are housing cost burdened. Only 5.4 percent of households making more than \$75,000 in Norfolk are housing cost burdened.

Table 32: Monthly Housing Costs as a Percentage of Household Income, 2019

	Virginia		MSA		Norfolk	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total	3,151,045		663,821		88,353	
Less than \$20,000:	326,064	10.3%	71,811	10.8%	14,926	16.9%
30 percent or more	267,440	8.5%	62,859	9.5%	12,693	14.4%
\$20,000 to \$34,999:	337,819	10.7%	79,222	11.9%	13,733	15.5%
30 percent or more	216,628	6.9%	60,118	9.1%	10,934	12.4%
\$35,000 to \$49,999:	339,034	10.8%	80,643	12.1%	11,724	13.3%
30 percent or more	160,090	5.1%	46,034	6.9%	6,152	7.0%
\$50,000 to \$74,999:	508,466	16.1%	123,711	18.6%	16,962	19.2%
30 percent or more	151,126	4.8%	38,959	5.9%	4,779	5.4%
\$75,000 or more:	1,551,883	49.2%	292,604	44.1%	28,453	32.2%
30 percent or more	121,115	3.8%	19,592	3.0%	1,550	1.8%
Zero or negative income	32,837	1.0%	7,137	1.1%	1,572	1.8%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

Almost 41 percent of all households in Norfolk spend more than 30 percent of household income on monthly housing costs. Norfolk has a higher share of households that are cost burdened, compared to both the State of Virginia (29.1 percent) and the MSA (34.3 percent).

Table 33: Households with Monthly Housing Costs Over 30% of Household Income, 2019

	Virginia	MSA	Norfolk
Number of households	916,399	227,562	36,108
Percent of households	29.1%	34.3%	40.9%
Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.			

Renters are more likely to be housing cost burdened than owners at every income level except for renter households with a household income of \$50,000 to \$74,999. This is the only cohort in

which owner-occupied households are paying 30 percent or more of their monthly income at a higher rate.

Table 34: Monthly Housing Costs as a Percentage of Household Income, Norfolk, 2019

	Total		Owner Occupied		Renter Occupied	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Total housing units:	88,353		38,339		50,014	
Less than \$20,000:	14,926	16.9%	3,118	8.1%	11,808	23.6%
30 percent or more	12,693	14.4%	2,682	7.0%	10,011	20.0%
\$20,000 to \$34,999:	13,733	15.5%	3,822	10.0%	9,911	19.8%
30 percent or more	10,934	12.4%	2,451	6.4%	8,483	17.0%
\$35,000 to \$49,999:	11,724	13.3%	3,955	10.3%	7,769	15.5%
30 percent or more	6,152	7.0%	2,157	5.6%	3,995	8.0%
\$50,000 to \$74,999:	16,962	19.2%	8,143	21.2%	8,819	17.6%
30 percent or more	4,779	5.4%	2,664	6.9%	2,115	4.2%
\$75,000 or more:	28,453	32.2%	19,089	49.8%	9,364	18.7%
30 percent or more	1,550	1.8%	1,229	3.2%	321	0.6%
Zero or negative income	1,572	1.8%	212	0.6%	1,360	2.7%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

G. Housing Problems

In addition to cost burden, housing quality data goes beyond the number of housing units and looks at key factors for livability and health, safety, and welfare. The Department of Housing and Urban Development's (HUD) Affirmatively Furthering Fair Housing (AFFH) Rule Guidebook defines housing problems as:

- Cost Burden: Monthly housing costs (including utilities) exceed 30 percent of household monthly income.
- Severe Cost Burden: Monthly housing costs (including utilities) exceed 50 percent of household monthly income.
- Overcrowding: Households have more than 1.01 to 1.5 persons per room, or
- Severe Overcrowding: Households have more than 1.51 persons per room.
- Substandard Housing: Households have one or more of the following substandard housing conditions:
 - i. Housing is without hot and cold piped water, a flush toilet and a bathtub or shower, and
 - ii. Housing with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

As of 2020, 38,790 households in Norfolk had at least one of the above housing problems. Forty-four percent of all households in the City of Norfolk experience one or more housing problems, higher than the MSA where 37.2 percent of all households experience a HUD defined housing problem. Of these households, the Hispanic population experiences any one of the housing problems at the highest rate at 55.5 percent. Other, Non-Hispanic, and Black or African American populations followed closely at 54.2 percent and 53 percent respectively. For every racial and ethnic category, the percent of households with housing problems was higher than the MSA.

Table 35: Housing Problems, 2020

Households experiencing any of 4 housing problems by race/ethnicity	Percent of households with problems	
	Race/Ethnicity	Norfolk
Hispanic	55.5%	47.9%
Other, Non-Hispanic	54.2%	44.4%
Black, Non-Hispanic	53.0%	47.6%
Native American, Non-Hispanic	52.6%	46.3%
White, Non-Hispanic	35.9%	30.9%
Asian or Pacific Islander, Non-Hispanic	35.8%	34.0%
Total	44.4%	37.0%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

H. Disproportionate Housing Cost

Severe housing cost burdened households are disproportionate by race in Norfolk. In Norfolk, Black, Non-Hispanic households are the most cost burdened at 27.8 percent of all households followed by Other, Non-Hispanic (26.3 percent) and Hispanic (22.5 percent) households. For all these groups, the percent of households with severe cost burden is higher for Norfolk than the MSA, except for the Native American, Non-Hispanic population. For the overall population, the total for Norfolk is 21.3 percent severe cost burdened compared to the MSA, which is 15.6 percent severe cost burdened. This is most disproportionate for the Other, Non-Hispanic group which is 26.3 percent cost burdened in Norfolk compared to 17.8 percent in the MSA. For Black, Non-Hispanic Norfolk households, the cost burden is about five percent more than compared to similar households in the MSA.

Table 36: Severe Housing Cost Burden by Race, 2019

Households with Severe Housing Cost Burden	% of households with severe cost burden	
Race/Ethnicity	Norfolk	MSA
Black, Non-Hispanic	27.8%	22.2%
Other, Non-Hispanic	26.3%	17.8%
Hispanic	22.5%	19.8%
Native American, Non-Hispanic	18.4%	20.3%
Asian or Pacific Islander, Non-Hispanic	16.4%	14.1%
White, Non-Hispanic	15.8%	12.0%
Total	21.3%	15.6%

Source: US Census Bureau, 2015-2019 American Community Survey 5-Year Estimates.

I. Foreclosures

According to U.S. foreclosure laws, in the Commonwealth of Virginia lenders may foreclose on deeds of trusts or mortgages in default using either judicial or non-judicial foreclosure process. The judicial process involves filing a lawsuit to obtain a court order to foreclose. This method is used when no “power of sale” is present in the mortgage or deed of trust. A “power of sale” clause in a deed of trust or mortgage pre-authorizes the sale of the property to pay off the balance on a loan in the event of default. In this case, the borrower has 240 days from the date of the sale to redeem the property by paying the amount for which the property was sold, plus six percent interest.

The non-judicial process of foreclosure is used when a power of sale clause exists in a mortgage or deed of trust. In deeds of trust or mortgages where a power of sale exists, the power given to the lender to sell the property may be executed by the lender or their representative.¹⁸

Based on data retrieved from RealtyTrac for the City of Norfolk, in March 2022 there were 63 properties in some stage of foreclosure (default, auction, or bank-owned).¹⁹ The map in Figure 12 shows neighborhoods with the highest foreclosures in Norfolk according to a project of New America, which found that the neighborhoods with the highest rates of foreclosure were those southwest of the Lafayette River, including Lindenwood and Barraud Park, which had rates four times the city average. New America also found that there is a strong correlation of race with majority Black census tracts experiencing the highest rates of foreclosure. They also found that

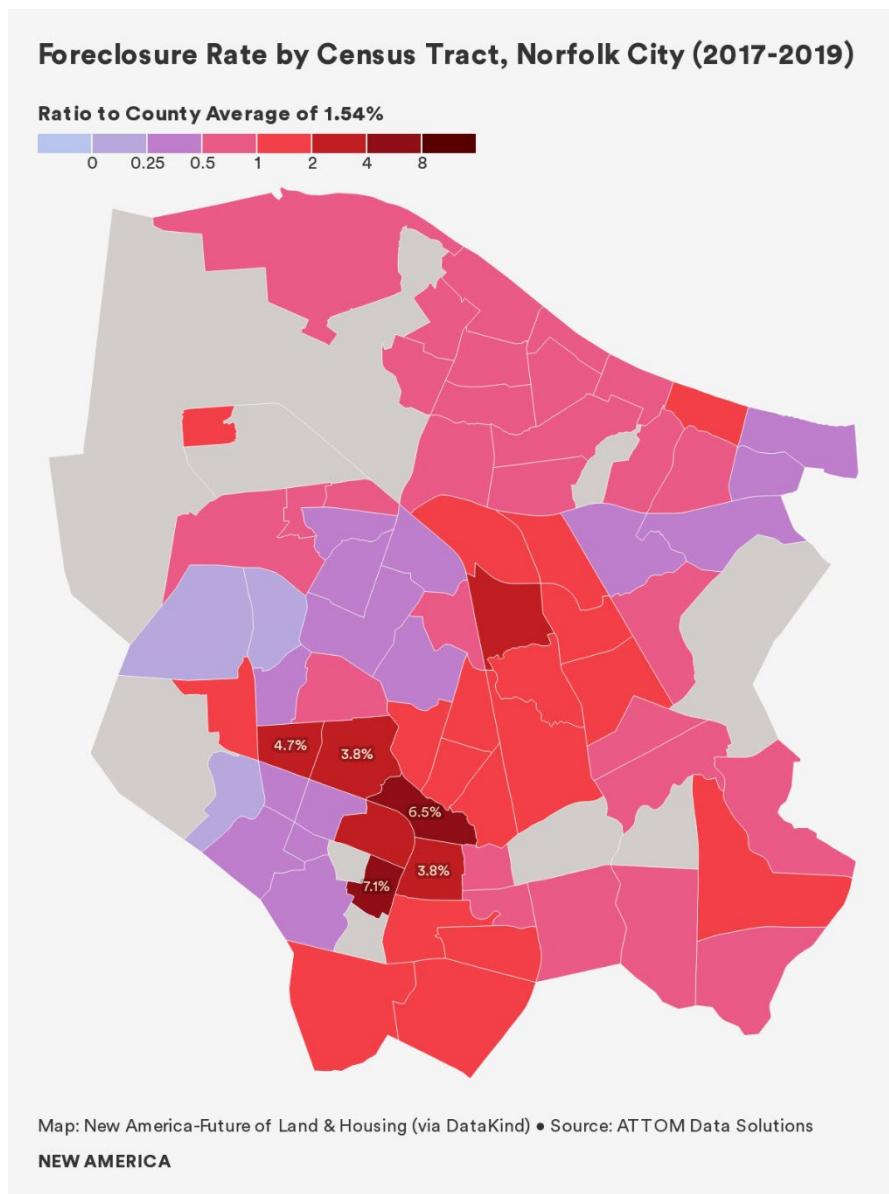
¹⁸ US Foreclosure Law - Virginia: http://www.foreclosurelaw.org/Virginia_Foreclosure_Law.htm

¹⁹ RealtyTrac Foreclosure Data:

<https://www.realtytrac.com/homes/va/norfolk/norfolk/?preForeclosure=true&auction=true&bankOwned=true¬YetListed=true&listedOnlineAuction=true&recentlySold=false¢erLat=76.2549104999995¢erLong=36.90377913096198&zoomLevel=11>

foreclosures were correlated with neighborhoods more reliant on public transit and with a higher percentage of single parent households.²⁰

Figure 12: Map of Foreclosures



Source: New America “Displaced in the Sunbelt” 2021.

Norfolk data regarding delinquent property taxes shows that in 2021, there were 6,178 properties via 3,104 property owners delinquent in \$3,722,639 of property tax. Eighteen property owners owed more than \$10,000 in property taxes. These numbers are also indicative

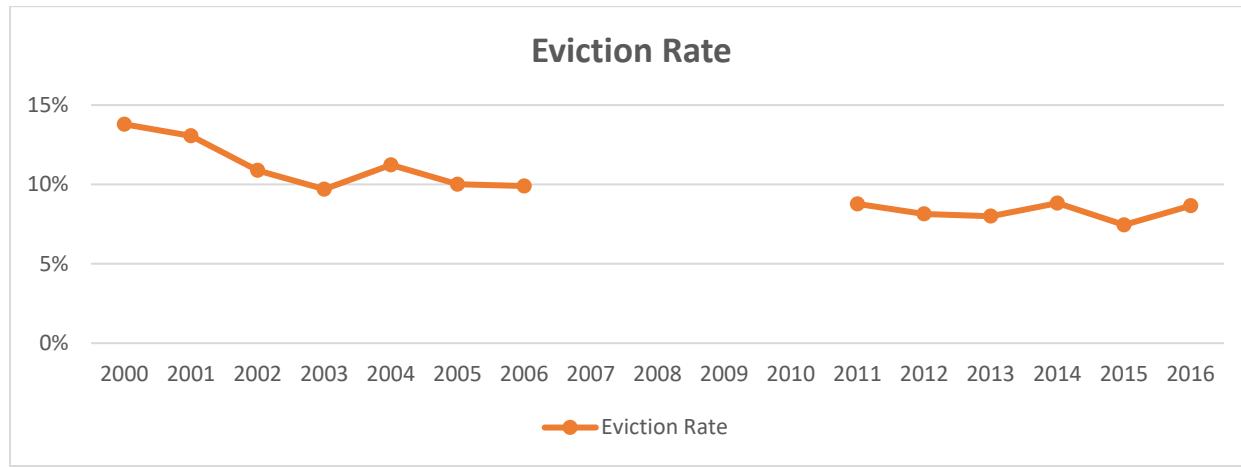
²⁰ “Displaced in the Sun Belt: Norfolk City, Virginia” New America, <https://www.newamerica.org/future-land-housing/reports/displaced-sun-belt/norfolk-city-virginia/>

of some concentration of property ownership in Norfolk as 106 owners were delinquent in over five different property addresses, and 29 of those owners were delinquent in taxes for over 10 different property addresses.

J. Displacement and Evictions

Norfolk has had a relatively high eviction rate in comparison to the country over the past decade. Princeton's Eviction Lab is a research project supported by the University's Sociology Department and produces research focused on the causes and consequences of housing instability in the United States. So far, the Eviction Lab has collected eviction data of over 80 million records for 13 states' court archives, as well as LexisNexis, Risk Solutions, and American Information Research Services Inc. In 2016, Norfolk was ranked sixth for the most evictions in the country for large cities, with Richmond, Hampton, and Newport News, VA ranked slightly higher. Norfolk had an eviction rate of 8.66 percent, higher than both Virginia Beach (7.26 percent), Chesapeake City (7.9 percent), but lower than Portsmouth (15.07 percent). This averaged to 11.81 evictions a day. At the same time, the eviction filing rate was 27.62 percent, or 13,788 eviction filings in 2016. Eviction filings are different than evictions in that they account for any result of a landlord filing a case in court to have a tenant removed from a property. The number of filings can include multiple filings against the same household. While filings may not lead to an eviction, they are important in showing potentially housing insecure tenants²¹. The chart below shows that while eviction rates remain high in Norfolk, the rates decreased between 2000 and 2016. The gap in data between 2006 and 2011 is due to incomplete data from Eviction Lab's research.

Figure 13: Norfolk Eviction Rate 2000 to 2016



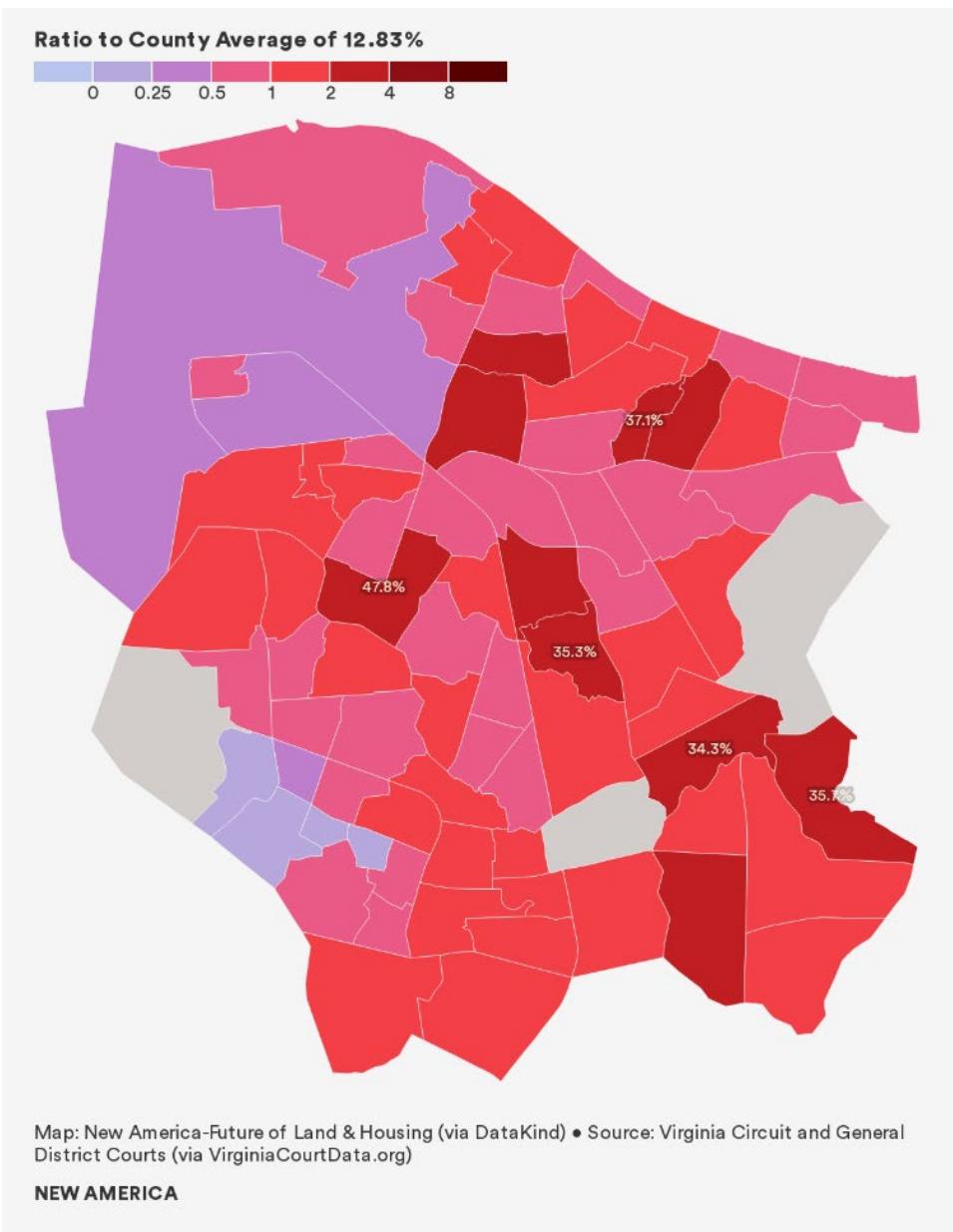
Source: Eviction Lab

²¹ "The Eviction Tracking System" Eviction Lab, <https://evictionlab.org/eviction-tracking/>

While the Eviction Lab cannot show granular data on demographics of evictions, they do indicate that households with children are especially vulnerable to forced displacement. In 2020, one of the primary researchers who created Eviction Lab led a study using 2012 – 2016 court records to understand the demographics of eviction. Using a predictor algorithm that assigned gender based on first name and race/ethnicity based on two Census Bureau data sets: the Surname List and the 2010 Decennial Census, they found that there are major racial and gender disparities amongst evictions. The study extrapolated from available data for 1,195 counties—or, about one-third of all renters in the United States—and found that eviction rates are significantly higher for Black renters than for white renters; Black and Latinx female renters faced higher eviction rates than their male counterparts; and Black and Latinx renters were most likely to be filed against serially for eviction. Previous studies on a smaller scale are consistent with these results and found that eviction was highest for black and Latinx and lower-income renters, as well as those with children.

The most recent research on evictions in Norfolk comes from a February 2021 New America report “Displaced in the Sun Belt” which tracked displacement in seven sunbelt cities including Norfolk. The report found that between 2017 and 2019, roughly one in 11 renters and homeowners with a mortgage lost their home every year; this was three times the housing loss rate of the rest of the sunbelt. Housing loss was most acute in the Military Circle area and the Ghent, Norview, and Alden Heights part of South Bayview neighborhoods which had housing loss at between 12 and 15 percent. Ninety-five percent of housing loss in Norfolk was due to evictions. Figure 14 shows evictions by census tract.

According to Norfolk’s Department of Neighborhood Services report to Norfolk City Council in January 2021, there are four primary factors that contribute to high eviction rates: a lack of affordable housing, poverty, a rental population uninformed about their rights, and weak tenant protection laws. Stakeholder interviews also indicated the relative ease in Norfolk for landlords to file for eviction, particularly citing low fees (about \$50) and no penalty for denial of eviction, which means landlords could repeatedly file without many barriers.

Figure 14: Eviction Rate by Census Tract 2017-2019 Average

Source: New America “Displaced in the Sunbelt” 2021.

While there is not yet data to understand the impact of the COVID-19 pandemic on evictions in Norfolk, the United States saw an unprecedented rise in eviction vulnerability and stakeholder interviews reveal that the impact was probably felt similarly in Norfolk. As of February 2022, there were few statewide protections in Virginia for evictions. On November 18, 2020, Governor Northam signed a bill that required landlords who own more than four units to offer tenants who fall behind on rent the option of a payment plan. If a tenant cannot come up with rent (for owners with fewer than four units) or a payment plan (for owners with more than four units), landlords are required to provide tenants with the notice of the availability of rental

relief and then landlords cannot file for eviction for 45 days while application is pending. After those 45 days, if the application is not approved, the landlord can file for eviction.²²

Through efforts put forth by the Department of Neighborhood Services, Norfolk has been working to address the high rates of eviction locally since before the COVID-19 pandemic and will continue to do so. In the last year, the Department of Neighborhood Services secured more than \$700,000 in grant funding from the Virginia Department of Housing and Community Development to launch the Virginia Eviction Reduction Pilot (VERP) 1.0 and 2.0. Initially, only families with children could benefit from the program, but now anyone who faces eviction can apply for the program.

New America's report interviewed housing experts about evictions during the COVID-19 pandemic. They found that affordable housing was constrained by the limited availability of land with the added limitations of flood risks. Additionally, interviewees felt that the large military presence meant that landlords could periodically raise rent knowing that "military pays housing allowances to its employees... [and] this practice has reverberating impacts for the rest of the residents." Interviewees also suggested that residents faced displacement pressures, leading them to relocate to other cities like Chesapeake and Virginia Beach. The interviewees did not believe that state and local government had adequately stabilized households since the COVID-19 eviction moratorium due to both an onerous application process for COVID relief funds and a lack of outreach to low-income areas. The report recommended disbursing aid directly to tenants, strengthening tenant protections, increasing outreach, and reducing onerous application processes.²³

While some interviewees were unsatisfied with housing outcomes, the City of Norfolk reported that Norfolk households received more than \$48 million in rent relief from the state's program—amounting to six percent of total state funding despite only representing three percent of the state population. Among other states, Virginia was also recognized for being one of the fastest to release rent relief funding to tenants.

K. Naturally Occurring Affordable Housing

Stakeholder interviews indicated that much of the naturally occurring affordable housing in Norfolk occurs in low-income neighborhoods with limited access to opportunity. Multiple interviewees spoke to the difficulty in accessing reliable and connected public transportation in low-income neighborhoods, stating that people might have to take multiple buses to work with delayed headways. The public transit section delves into further connectivity concerns. Another major concern of many interviewees was that naturally occurring affordable housing suffered from mold problems with one noting "nearly all the families I work with suffer from childhood

²² "COVID-19 Housing Policy Scorecard" Eviction Lab, <https://evictionlab.org/covid-policy-scorecard/>

²³ "Displaced in the Sun Belt: Norfolk City, Virginia" New America, <https://www.newamerica.org/future-land-housing/reports/displaced-sun-belt/norfolk-city-virginia/>

asthma." Even for homeowners, home repairs of an aging housing stock were often financially prohibitive. Flooding was also a major problem for much of the naturally occurring affordable housing.

VI. Data on Populations with Special Needs

The following sections explore the specific housing needs of residents with special needs, many of whom may have a harder time finding, securing, or maintaining housing. Understanding the needs of these subpopulations helps to determine whether any specific fair housing trends or patterns are disproportionately affecting these communities.

Key Data and Insights:

- Norfolk is part of a Continuum of Care that includes Chesapeake, Franklin, Suffolk, Isle of Wight, and Southampton County. The January 27, 2021, point-in-time homeless count showed that there were 538 people in shelters, including 38 households with children under 18. There were also 26 people in transitional housing. One-third of all sheltered people were severely mentally ill, and one-fifth were veterans. (A.ii)
- Veterans are 15.9 percent of Norfolk's population and are more likely than the civilian population to have a disability. (E)
- Based on our review, sufficient data is not collected about LGBTQ+ housing issues and LGBTQ+ identification. Despite this, Norfolk has available LGBTQ+ services and government representation. (A.iii)
- Disability rates in Norfolk are highest amongst American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and Black or African American populations. People with disabilities have lower employment rates than people without disabilities. (C.i)
- Based on publicly available data and stakeholder responses, there appears to be limited affordable, accessible housing in Norfolk—in terms of building accommodations, walkability, access to community amenities, and feelings of being “part of the neighborhood.”

City of Norfolk Actions:

- The City of Norfolk's FY 2023 Annual Plan includes funding for the rehabilitation of an apartment complex that provides housing to persons with physical disabilities and brain injuries, as well as seniors and veterans. This project will serve approximately 24 households.
- The Norfolk Community Services Board's Housing and Homeless Services unit has been providing shelter at a local hotel since March 2020 in response to the COVID-19 pandemic. Dubbed the “Safety Hotel,” the operation serves about 80 of Norfolk's most vulnerable homeless population - those in the CDC group identified at high risk for severe illness within the unsheltered homeless community.
- In September 2021, the City of Norfolk purchased a motel to serve as the permanent location for its homeless shelter. The Norfolk Community Services Board now operates the 100-bed emergency shelter for single adults experiencing homelessness in Norfolk.

In addition to providing year-round shelter beds, The Center provides day services to homeless individuals which include a midday meal, access to outreach and case management staff, assistance with navigating the housing process and linkage to benefits including SNAP (food stamps), health insurance, and more. The Center also serves as the City's overnight shelter response during severely cold weather (as declared by the Emergency Operations Center) with up to 50 additional overflow spots.

A. People Experiencing Homelessness

i. Definition of Homelessness

The Department of Housing and Urban Development (HUD) classifies homelessness in one of four ways: literally homeless, at imminent risk of homelessness, homeless under other Federal statutes, and fleeing/attempting to flee domestic violence (DV). A brief description of each category is provided below.²⁴

1. **Literally Homeless:** Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
 - c. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
2. **Imminent Risk of Homelessness:** Individual or family who will imminently lose their primary nighttime residence, provided that:
 - a. The residence will be lost within 14 days of the date of application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. The individual or family lacks the resources or support networks needed to obtain other permanent housing.
3. **Homeless under other Federal statutes:** Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - a. Are defined as homeless under the other listed federal statutes;

²⁴ "Four Categories of the Homeless Definition" HUD Exchange, <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

- b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- c. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- d. Can be expected to continue in such status for an extended period due to special needs or barriers.

4. **Fleeing/Attempting to Flee DV:** Any individual or family who:
 - a. Is fleeing, or is attempting to flee, domestic violence;
 - b. Has no other residence;
 - c. Lacks the resources or support networks to obtain other permanent housing; and
 - d. Dating violence, sexual assault, stalking, or other dangerous or life-threatening situations related to violence; have no other residence; and lack the resources or support networks to obtain other permanent housing.

The Emergency Solutions Grant (ESG) program also follows the same definition of homelessness. For emergency shelter, beneficiaries must meet the “homeless” definition in 24 CFR 576.2. For essential services related to emergency shelter, beneficiaries must be “homeless” and staying in an emergency shelter (which could include a day shelter). For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103. For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).²⁵

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and Homeless Management Information System (HMIS), as well as administrative activities. To be eligible for ESG funding, beneficiaries must meet various definitions of homelessness depending on the service.

For essential services related to street outreach, beneficiaries must meet the following criteria according to paragraph (1)(i) of the homeless definition under 24 CFR 576.2: an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters,

²⁵ “ESG Requirements” HUD Exchange, <https://www.hudexchange.info/programs/esg/esg-requirements/>

transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103: homelessness prevention assistance may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraphs 2, 3, or 4 of the homeless definition in 24 CFR 576.2 and have an annual income below 30 percent of median family income for the area as determined by HUD.

At risk of homelessness means, an individual or family who:

- 1) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- 2) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and
- 3) Meets one of the following conditions:
 - a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b) Is living in the home of another because of economic hardship;
 - c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the US Census Bureau;
 - f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facilities, or correction program or institution); or
 - g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

For emergency shelter, beneficiaries must meet the following criteria, according to the homeless definition in 24 CFR 576.2:²⁶

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - b) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - c) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- 2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - b) No subsequent residence has been identified; and
 - c) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - a) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - b) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

²⁶ Homeless definition found at: <https://www.law.cornell.edu/cfr/text/24/576.2>

- c) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- d) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

4) Any individual or family who:

- a) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- b) Has no other residence; and
- c) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

For essential services related to emergency shelter, beneficiaries must be homeless and staying in an emergency shelter (which could include a day shelter).

ii. Continuum of Care (CoC) Program

The HUD Continuum of Care (CoC) program promotes communitywide commitment to the goal of ending homelessness; provides funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; promotes access to and utilization of mainstream programs by homeless individuals and families; and optimizes self-sufficiency among individuals and families experiencing homelessness.

HUD requires CoCs to conduct a Point-in-Time (PIT) Count of sheltered and unsheltered people experiencing homelessness on a single night in January. CoCs must conduct a count of people experiencing homelessness who are sheltered in emergency shelter, transitional housing, and Safe Havens annually; they must conduct a count of unsheltered people experiencing homelessness every other year. Though helpful in measuring changes in homelessness from year to year through a snapshot of homelessness on a single night, it is an imperfect method for gauging the size of the population of those who may experience homelessness throughout the

year. Additionally, a shift in the methodology a CoC uses to count the homeless may cause a change in homeless counts between reporting periods.

Southeastern Virginia Homeless Coalition is the CoC that includes the City of Norfolk Chesapeake, Franklin, Suffolk, and Isle of Wight and Southampton Counties. Based on the most recent CoC PIT Count submitted to HUD, there were 472 homeless households counted on January 27, 2021. Single adult households without children were the largest proportion of homeless households, representing 80.9 percent of homeless households. The table below summarizes homeless households by type.

Table 37: Summary of Household Type Reported, 2021

Household Type	Emergency Shelter	Transitional Housing	Unsheltered	Total Homeless Households
Households without children*	411	23		434
Households with at least one adult and one child**	37	1		38
Households with only children***	0	0		0
Total	448	24	+++	472

Source: HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulation

* This category includes single adult couples with no children and groups of adults.

** This category includes households with one adult and at least one child under age 18.

*** This category includes persons under age 18, including children in one-child households, adolescent parents and their children, adolescent siblings, or other household configurations composed only of children.

+++In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in - person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The user is cautioned that the unsheltered and total homeless counts reported here may be missing data.

According to the January 2021 Point in Time (PIT) Count performed by the Southeastern Virginia Homeless Coalition CoC, Black or African Americans represented 71.3 percent of the population in shelters and transitional housing.

Table 38: Demographic Summary by Race and Ethnicity, 2021

Race	Sheltered	Transitional Housing
Black or African American	380	22
White	125	2
Asian	2	1
American Indian or Alaska Native	3	0
Native Hawaiian or Other Pacific Islander	0	0
Multiple Races	28	1
Total	538	26

Source: HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulation.

Interviews with professionals in homeless services in Norfolk revealed that they believed homeless counts had increased during the pandemic; their services had been constantly utilized since March of 2020. They thought that many uncounted homeless populations, i.e., people who temporarily stayed between friends or with family members lost their shelter due to concerns over the pandemic and overcrowded homes. To cope with this challenge, the City of Norfolk began the Healthy Hotel Project which housed over 200 members of Norfolk's homeless community in former hotels. This program provided wrap around supportive services to provide food, shelter, and emergency care.²⁷ Despite this new program, some interviewees expressed that there were not enough services to meet the need in Norfolk.

Based on the 2021 PIT count data, there were 118 chronically homeless individuals in Norfolk, Chesapeake, Franklin, Suffolk, and Isle of Wight and Southampton Counties, mostly residing in emergency shelters. This data, however, may be skewed by the altered point in time count methodology during the COVID-19 pandemic that did not count unsheltered persons in the region.

²⁷ "Homeless Services" City of Norfolk, <https://www.norfolk.gov/5144/Homeless-Services>

Table 39: Summary of Chronically Homeless Households by Household Type Reported, 2021

	Emergency Shelter	Transitional Housing	Unsheltered	Total
Total Chronically Homeless	118	0	+++	118

Source: HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations
+++In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The user is cautioned that the unsheltered and total homeless counts reported here may be missing data.

All other sub-populations reported as homeless are described in Table 40. Based on 2021 PIT count data, many homeless people reported severe mental illness (33.6 percent). Veterans were the second highest sub-population at 20.9 percent and victims of domestic violence were the third highest at 17.2 percent. This is important to better understand how to target outreach, wrap-around services, and funding for homeless programs in the region.

Table 40: Summary of all other Populations Reported, 2021

Sub Population	Sheltered	Transitional Housing	Total+++	Percent
Severely Mentally Ill	87	3	90	33.6%
Veterans	56	0	56	20.9%
Victims of Domestic Violence	44	2	46	17.2%
Chronic Substance Abuse	34	3	37	13.8%
Unaccompanied Youth	15	0	15	5.6%
HIV/AIDS	11	0	11	4.1%
Children of Parenting Youth	8	0	8	3.0%
Parenting Youth	5	0	5	1.9%

Source: HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations.
+++Due to missing unsheltered homeless counts, the total counts reported here may be undercounted.

iii. LGBTQ+ Persons

Persons who identify as LGBTQ+ are protected under the Fair Housing Act based on sex, though the FHA does not specifically name sexual orientation as a protected class. HUD's Equal Access to Housing Final Rule (2012) and the Equal Access in Accordance with an Individual's Gender Identity Final Rule (2016) require equal access to HUD programs without regard to a person's actual or perceived sexual orientation, gender identity, or marital status.

Human Rights Campaign's report card of Norfolk rates the city 91/100 for LGBTQ friendliness, losing the most points for not having transgender-inclusive healthcare benefits for City staff. Norfolk got full points for employment, housing, and public accommodations and having an LGBTQ+ police liaison or task force led by an openly gay Sergeant.²⁸

iv. City of Norfolk Programs

Norfolk has created programs to aid residents facing homelessness and housing insecurity. During the COVID-19 pandemic, Norfolk created the Healthy Hotel Project to house over 200 residents facing homelessness and provide food, shelter, and medical care. Outside of pandemic emergency services, the City operates The Center—a 100-bed emergency shelter for single adults that provides outreach and case management. During severely cold weather, The Center opens 50 additional overflow spots. Lastly, Norfolk has a Street Outreach team made up of Substance Abuse and Mental Health Services, a branch of U.S. Department of Health and Human Services and Project for Assistance in Transition from Homelessness (PATH) and the Homeless Initiatives Project which combined contributes four full time case workers to conduct street outreach, help navigate people through the housing process, and provide short-term case management.²⁹

B. Senior Population

Norfolk has a 65-years-and-over population that is 12 percent of the total civilian, non-institutionalized population (65-years-and-over is 10.9 percent of total population when including institutionalized and military). In 2019, this was 25,948 people out of the 215,745-person civilian non-institutionalized population. This is a lower percentage than the MSA where the population 65 years and older makes up 14.3 percent of the population. This is an increase from 2014 when the 65-years-and-older population was 9.6 percent of the total population and about 3,000 fewer people. Seniors may have special needs in securing housing because they may have limited or fixed incomes and an increased need for accessible, affordable housing.

i. Senior Population and Disability

Based on 2019 ACS data, 38 percent of all seniors identified as having a disability. It is important to note that disabilities do not encapsulate illness and may not represent the full population with accessibility needs. For the seniors who self-identified as having a disability, the most common were ambulatory difficulties at 26.5 percent and independent living difficulties at 18.8 percent. Ambulatory difficulties are “having serious difficulty walking or climbing stairs.” Independent living difficulties are defined as any “difficulties doing errands alone such as

²⁸ HRC Municipality Database – Norfolk: <https://www.hrc.org/resources/municipalities/norfolk>

²⁹ City of Norfolk Homeless Services, [Homeless Services | City of Norfolk, Virginia - Official Website](https://www.norfolkva.gov/2020/07/16/homeless-services-city-of-norfolk-virginia-official-website)

visiting a doctor's office or shopping, because of a physical, mental, or emotional problem.”³⁰ Both disabilities may require accessible housing.

Table 41: Senior Population by Disability, Norfolk, 2019

	Total Civilian Non-Institutionalized Population	Percent of Population 65 and Over with a Disability
Total Civilian Non-Institutionalized Population	215,745	
65 Years and Over	25,948	12.0%
With a Disability	9,860	38.0%
With a hearing difficulty	2,978	11.5%
With a vision difficulty	1,918	7.4%
With a cognitive difficulty	2,852	11.0%
With an ambulatory difficulty	6,873	26.5%
With a self-care difficulty	2,721	10.5%
With an independent living difficulty	4,889	18.8%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

ii. Senior Population and Poverty

Based on 2019 ACS data, seniors 65 years and older have a poverty rate of about 11.9 percent. This is the lowest poverty rate of any age group. Despite the low poverty rate, senior residents face challenges around affordable housing due to a higher likelihood of having a fixed and lower income and the increased burden of medical expenses.

iii. Senior Population and Housing Security

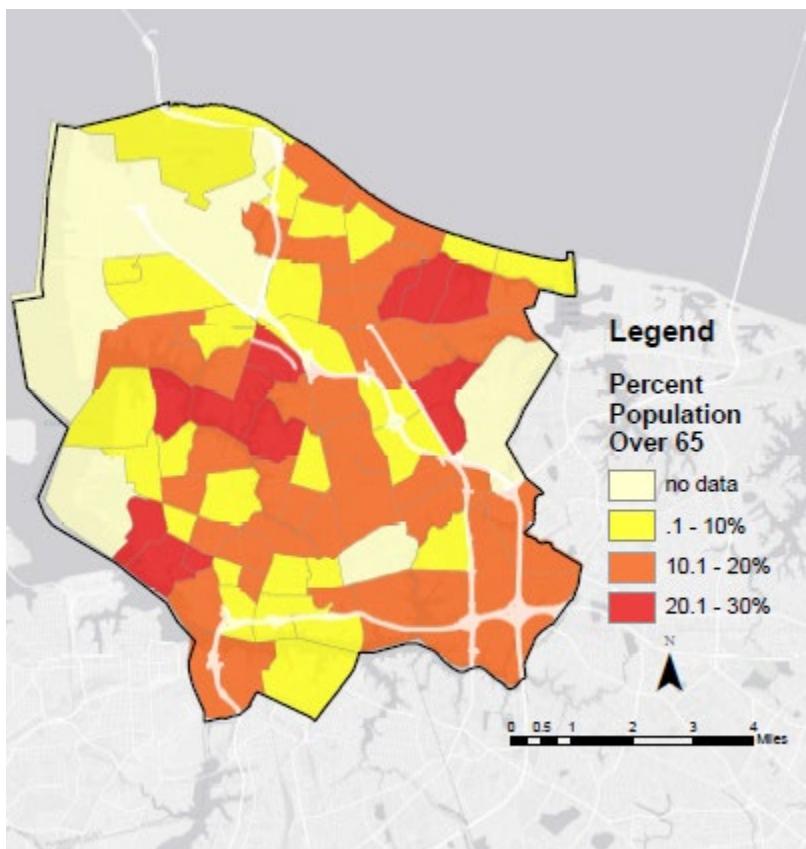
According to the Senior Services of Southeastern Virginia hotline data report from April 1, 2021, to September 30, 2021, 24 percent of their calls were based in Norfolk, or about 579 calls. While the types of calls and housing status were recorded in aggregate and not granularly shown by city, we can use the regional data as a proxy for the housing problems that seniors age 50+ face in Norfolk. The top housing problems the hotline recorded were shelter (35 percent), utilities (26 percent), rent (23 percent), and information (13 percent). While callers to the hotline are mostly residents facing acute housing problems, it is important to note that 21 percent of callers were currently homeless, and 16 percent were at imminent risk of losing their housing. Fifty-eight percent of callers had a disabling condition and 18 percent had veteran status. (Appendix B)

³⁰ “How Disability Data are Collected from the American Community Survey”, [https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html#:~:text=Independent%20living%20difficulty%20Because%20of,office%20or%20shopping%20\(DOUT\).](https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html#:~:text=Independent%20living%20difficulty%20Because%20of,office%20or%20shopping%20(DOUT).)

iv. Location of Population 65 Years and Over

The map in Figure 15 shows the percent of population 65 and older by census tract. The elderly population is dispersed throughout the city, with some concentration in the center of the city. Stakeholders indicated that the elderly population that they worked with wanted to live in more accessible, walkable neighborhoods within access of doctors, grocery stores, and daily errands as they aged, and automobile dependent mobility got more difficult. They also indicated that many of their elderly clients wanted to live in mixed-age neighborhoods with families, instead of limited options of accessible communities.

Figure 15: Location of Population 65 and Older



Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

C. Persons with Disabilities

Federal law classifies persons with disabilities as having a physical or mental impairment that substantially limits one or more major life activities. As a result, persons with disabilities may need specific accessibility features or additional services in housing, transportation, education, and other programs or facilities to have equal opportunity. This section looks at the demographic profile of persons with disabilities residing in the Norfolk and explores how and

where persons with disabilities are geographically dispersed or concentrated. This analysis will help to identify if certain populations living with disabilities experience segregation or unequal access to opportunity in Norfolk.

Based on ACS data, Norfolk had a higher percent of people living with disabilities than both the MSA and Virginia in 2019. That same year, 26,448 Norfolk residents identified as having at least one of the census designated disabilities.

Table 42: Percent of People with Disabilities, 2019

	Norfolk	MSA	Virginia
Percent of people with a disability	16.0%	15.5%	13.9%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

i. Disability by Race and Ethnicity

At the national level, Native Americans have the highest rate of disability among working-age adults, followed by African Americans, Whites, Hispanics, and Asians.³¹ Looking at the disability statistics in Table 43, Norfolk's residents with disabilities follow similar trends to the rest of the country, with slightly higher proportion of Asian population with disabilities. 18.7 percent of the American Indian and Alaska Native population has a disability, followed by 14.8 percent of Black or African Americans, 13.4 percent of White residents (not Hispanic or Latino), 9.9 percent of Asian residents, and 8.9 percent of Hispanic or Latino residents.

Table 43: Disability by Race, Norfolk, 2019

	Total	With a disability	Percent with a disability
White alone	96,451	12,680	13.1%
Black or African American alone	93,818	13,880	14.8%
American Indian and Alaska Native alone	754	141	18.7%
Asian alone	8,156	805	9.9%
Native Hawaiian and Other Pacific Islander alone	125	19	15.2%
Some other race alone	6,596	524	7.9%
Two or more races	9,845	1,052	10.7%
White alone, not Hispanic or Latino	89,873	12,012	13.4%
Hispanic or Latino (of any race)	15,941	1,413	8.9%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

³¹ "Disability rates among working-age adults are shaped by race, place, and education" Brookings, <https://www.brookings.edu/blog/the-avenue/2018/05/15/disability-rates-among-working-age-adults-are-shaped-by-race-place-and-education/>

ii. Disability by Type

The American Community Survey (ACS) captures six types of disabilities. A brief description of each disability type is provided below:

1. Hearing Difficulty: Deafness or serious difficulty hearing.
2. Vision Difficulty: Blindness or serious difficulty seeing, even when wearing glasses.
3. Cognitive Difficulty: Serious difficulty concentrating, remembering, or making decisions due to physical, mental, or emotional condition.
4. Ambulatory Difficulty: Serious difficulty walking or climbing stairs.
5. Self-care Difficulty: Difficulty dressing or bathing.
6. Independent Living: Difficulties doing errands alone, such as visiting a doctor's office or shopping due to a physical, mental, or emotional condition.³²

Among Norfolk residents with a disability, ambulatory difficulties are most prevalent. Persons with ambulatory difficulties comprise 7.7 percent of Norfolk residents, followed by 6.6 percent of persons with independent living difficulties, and 6.3 percent of persons with cognitive difficulties. The table below breaks down each disability by type.

Table 44: Disability by Type

	With a Disability	Percent with a Disability
Total Civilian Non-institutionalized population (over 16)	26,448	16.0%
With a hearing difficulty	6,476	3.0%
With a vision difficulty	5,546	2.6%
With a cognitive difficulty	12,563	6.3%
With an ambulatory difficulty	15,411	7.7%
With a self-care difficulty	6,437	3.2%
With an independent living difficulty	11,035	6.6%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

iii. Disability Concentrations

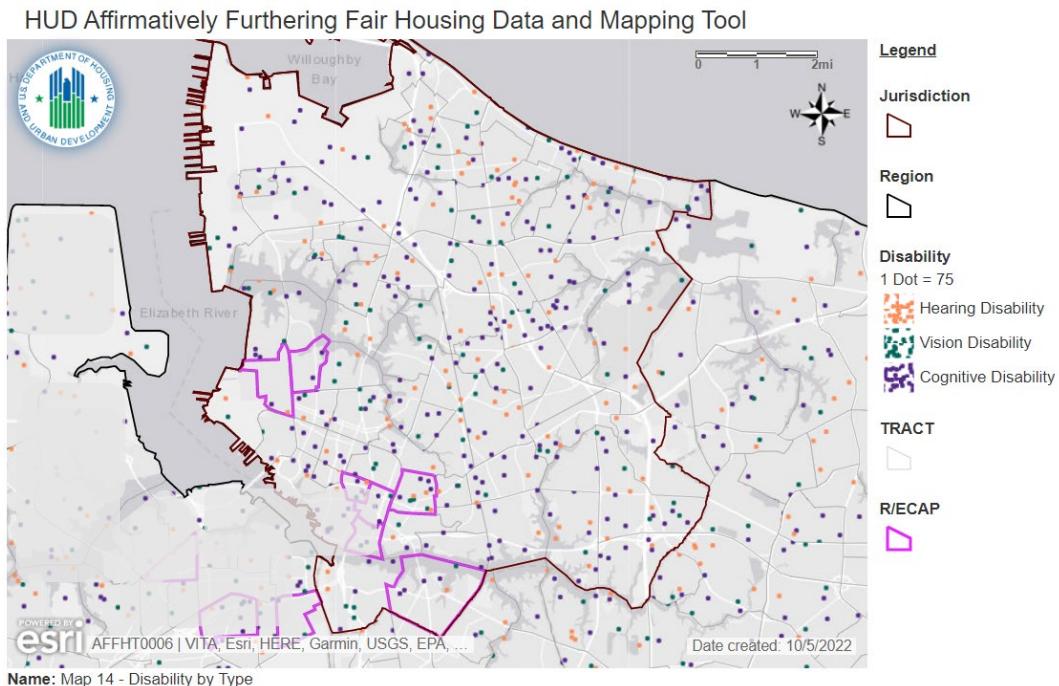
The following two maps in

Figure 16 and Figure 17 show where people with disabilities in Norfolk are concentrated. The dot densities displayed—where one dot is equivalent to 75 people—can reveal if there is a concentration of people with disabilities by geography. The first map does not seem to illustrate any concentrations of people with hearing, vision, and cognitive disabilities. The

³² How Disability Data are Collected from The American Community Survey,
<https://www.census.gov/topics/health/disability/guidance/data-collection-acss.html>

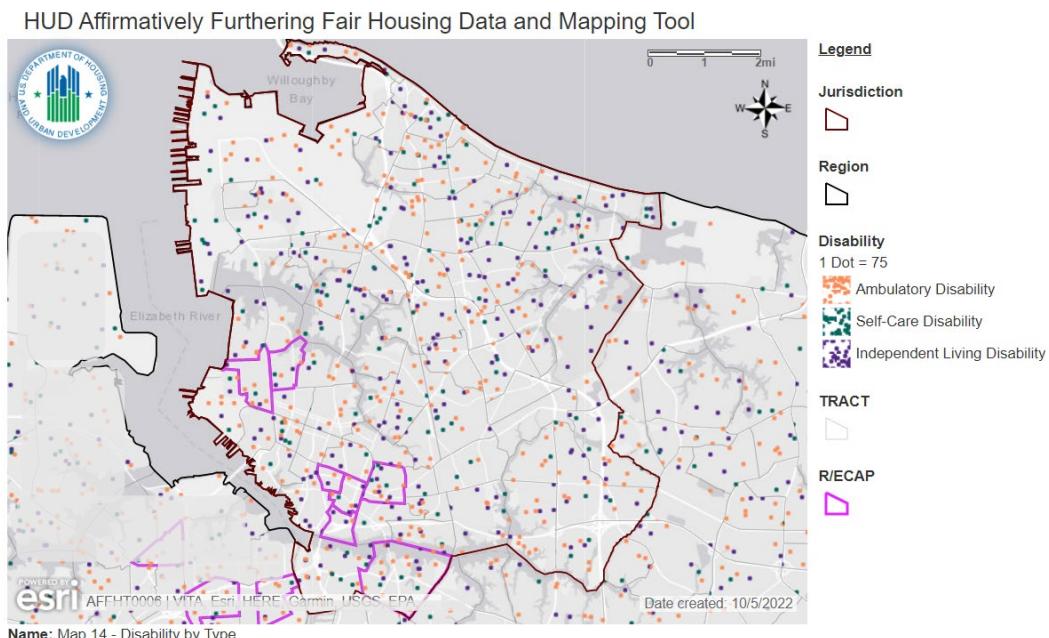
second map also does not seem to illustrate any concentrations with ambulatory, self-care, and independent living disabilities.

Figure 16: Population of persons with disabilities by types and R/ECAPs, Norfolk Area, 2019



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/>

Figure 17: Population of persons with disabilities by type and R/ECAPs, Norfolk



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/>

iv. Disability by Age

Norfolk has a higher percentage of residents with disabilities than both the MSA and the state. Within the city, senior residents over 65 years of age have a significantly higher rate of physical or mental disability compared to the rest of the population. In 2019, 38 percent of senior residents had a disability, representing 9,860 residents. For residents 75 and older, 52.8 percent of that age group identified as having a disability.

Table 45: Disability by Age Group in Norfolk, 2019

	Total	With a disability	Percent with a disability
Under 18	48,150	2,577	5.4%
18 to 64	141,647	16,664	11.8%
65 and older	25,948	9,860	38.0%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

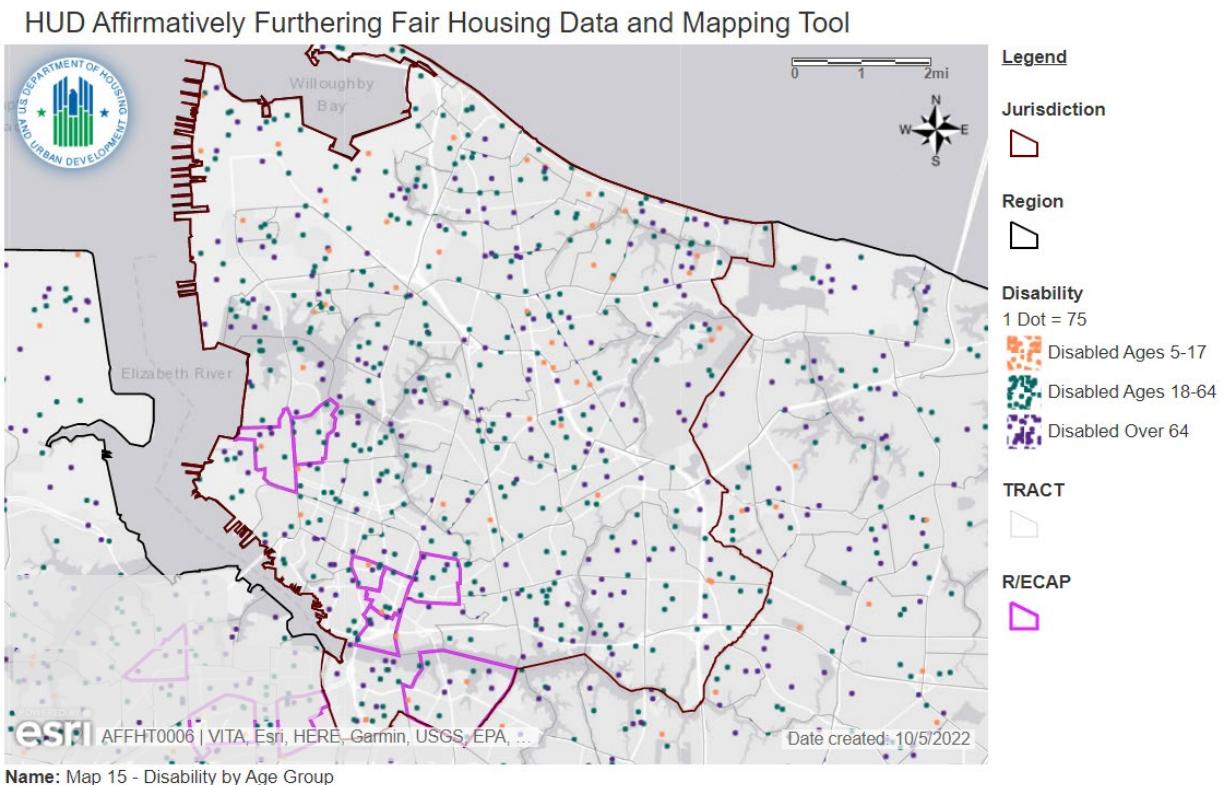
Categorizing by type of disability reveals that for the population 65 and over, ambulatory difficulties (26.5 percent of the age group) and self-care difficulties (18.8 percent of the age group) are the most common disabilities. Both disabilities may require adaptive housing.

Table 46: Age Group by Type of Disability, 2019

	Hearing difficulty	Vision difficulty	Cognitive difficulty	Ambulatory difficulty	Self-care difficulty
Population under 18 years	0.9%	0.6%	6.3%	0.6%	-
Population 18 to 64 years	2.2%	2.4%	5.4%	5.9%	4.3%
Population 65 years and over	11.5%	7.4%	11.0%	26.5%	18.8%

The map below shows where disabilities by age group in Norfolk are concentrated. The dot densities displayed, where one dot is equivalent to 75 people in each age group, can reveal if there is a concentration of disabilities by age by geography. The map below does not reveal any discernable spatial concentration or pattern of disability by age group.

Figure 18: Disability by Age Group, Norfolk, 2019



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/>

v. Disability and Poverty

There are several connections between persons with disabilities and poverty levels. According to the Brookings Institution, people with disabilities have much lower employment rates than people without disabilities.³³ This data helps to explain the rate of working-age adults (18 to 64) with a disability whose income is below the poverty level (5.6 percent).

Housing choice for persons who have disabilities and living below the poverty level could be a challenge due to the limited availability of housing which is both affordable and accessible. Some interviewed stakeholders identified NIMBYism (“Not in my backyard”) as a major obstacle to siting new affordable housing developments in Norfolk. Community resistance to the construction of affordable housing for persons with disabilities in communities that have access to services and opportunities poses another challenge that may have the effect of limiting the supply of affordable and accessible housing.

³³ “Disability rates among working-age adults are shaped by race, place, and education” Brookings, <https://www.brookings.edu/blog/the-avenue/2018/05/15/disability-rates-among-working-age-adults-are-shaped-by-race-place-and-education/>

Table 47: Age by Disability Status by Poverty Status

	Persons with a disability whose income in the past 12 months is below the poverty level:	
	Estimate	Percent
Under 5 years:	176	1.1%
5 to 17 years:	249	0.8%
18 to 34 years:	944	1.7%
35 to 64 years:	2,879	3.9%
65 to 74 years:	839	4.9%
75 years and over:	627	5.9%
Total Civilian Population for whom poverty status is determined	205,214	

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

D. Persons Protected Under the Violence Against Women Act

Guidance issued by HUD in 2016 subsequent to the Violence Against Women Act established new housing protections for individuals participating in HUD-funded housing programs who are survivors of domestic violence, dating violence, sexual assault, and/or stalking (DV). [HUD's 2016 Final Rule](#) extended core protections to CoC, ESG, and HOPWA programs.

Violence Against Women Act (VAWA) housing protections include:

- Protection against housing denials, program terminations, and evictions that directly result from being a victim of DV.
- Acts of violence against someone cannot be considered serious or repeated violations of a lease or good cause for eviction or terminating federal assistance.
- Providing for emergency transfers to allow survivors to move to another safe and available unit if they fear for their life and safety.
- The housing authority, housing provider, or landlord may evict the abuser alone and let the victim and other household members remain in the home. If the federal housing assistance was based on the abuser's eligibility, then the victim and any remaining tenants have the right to prove eligibility for housing. If the victim cannot prove eligibility, they must be given a reasonable time to prove eligibility for another federal housing program or to find new housing.
- Victims with Section 8 Housing Choice Vouchers are permitted to move and keep the voucher even if the lease has not ended.³⁴

³⁴ NHLP Violence Against Women Act, <https://nhlp.org/files/VAWA-2013-Packet.pdf>

The Violence Against Women Act was reauthorized in 2021 with some updated policies. These included more inclusive wording around gender, enhanced sentencing of federal sex offenders, and a new protection that would enable victims in federally assisted housing to get relocation vouchers, keep their housing after the perpetrator leaves, or terminate a lease early. It also changed the policies around gun ownership with unmarried partners.³⁵

Based on the HUD 2018 PIT Count, there were a total of 44 sheltered survivors of domestic violence experiencing homelessness within the CoC covering Norfolk, Chesapeake, Suffolk/Isle of Wight, Southampton Counties. Forty-two survivors were in an emergency shelter and two were in transitional housing. Because the 2021 PIT Count was complicated by the COVID-19 pandemic, the more recent count of the unsheltered population of domestic violence survivors is unclear.³⁶ During COVID-19, domestic violence increased across American cities both in terms of prevalence and severity.³⁷ While there is not accessible data on incidents specific to Norfolk, it is likely that Norfolk followed the pattern seen across the country.

E. Veterans

Veterans comprise 15.9 percent of Norfolk's population—a total of 26,924 residents. Norfolk has the world's largest naval station, supporting 75 ships and 134 aircraft alongside 14 piers and 11 aircraft hangars. Neighboring Hampton Roads also has military bases which combined likely leads to a veteran population that is a significant portion of the population. It is important to note that because the data only factors active and veteran service members in the total number of "veterans", this population label does not consider the multiplier of children, spouses, and other family who are connected to the military.

Of residents who identify as veterans, they are mostly male (83.3 percent), White, and more likely to have a disability. About 18.3 percent of the veteran population or 4,856 total veterans in Norfolk have a disability.

Table 48: Military Population, Norfolk, 2019

	Norfolk Total		Veterans		Nonveterans	
	Total	Percent	Total	Percent	Total	Percent
Civilian population 18 years and over	169,819		26,924	15.9%	142,895	84.1%
Male	81,937	48.2%	22,439	83.3%	59,498	41.6%
Female	87,882	51.8%	4,485	16.7%	83,397	58.4%

³⁵ "Here's the latest on the Violence Against Women Act, which is up for reauthorization by Congress" LA Times, <https://www.latimes.com/world-nation/story/2021-05-28/violence-against-women-act-congress>

³⁶ HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations , https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_VA-501-2021_VA_2021.pdf

³⁷ "Domestic Violence is a Pandemic Within the COVID-19 Pandemic" Time, <https://time.com/5928539/domestic-violence-covid-19/>

Population	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Percentage of population
White alone	80,194	47.2%	15,804	58.7%	64,390	45.1%		
Black or African American alone	72,260	42.6%	9,021	33.5%	63,239	44.3%		
American Indian and Alaska Native alone	614	0.4%	98	0.4%	516	0.4%		
Asian alone	6,940	4.1%	690	2.6%	6,250	4.4%		
Native Hawaiian and Other Pacific Islander alone	101	0.1%	14	0.1%	87	0.1%		
Some other race alone	4,619	2.7%	349	1.3%	4,270	3.0%		
Two or more races	5,091	3.0%	948	3.5%	4,143	2.9%		
Civilian population 18 years and over for whom poverty status is determined	160,471		26,533		133,938			
With any disability	26,203	16.3%	4,856	18.3%	21,347	15.9%		
Without a disability	134,268	83.7%	21,677	81.7%	112,591	84.1%		

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

F. Immigrants

Under the Fair Housing Act, discrimination in the sale, rental, and financing of dwellings and in other housing-related transactions based on race, color, national origin, religion, sex, familial status, and disability is illegal regardless of the victim's immigration status. Additionally, different treatment in housing because of a person's ancestry, ethnicity, birthplace, culture, or language based on national origin is illegal. People cannot be denied housing opportunities because they or their family are from another country, because they have a name or accent associated with a national origin group, because they participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin.

Norfolk has a foreign-born population from a wide range of national origins. The top ten places of birth for Norfolk's foreign-born residents include South America, Africa, and Asia. Most foreign-born residents originate from the Philippines, approximately 3,595 persons, followed by persons from "Other Central America" (1,665 persons) and El Salvador (1,065 persons).

Table 49: Countries of Origin, Norfolk, 2020

	Country	Number	Percent of Population
#1 country of origin	Philippines	3,595	1.57%
#2 country of origin	Other Central America	1,665	0.73%
#3 country of origin	El Salvador	1,065	0.47%
#4 country of origin	Other South America	800	0.35%
#5 country of origin	Western Africa	755	0.33%
#6 country of origin	Mexico	705	0.31%
#7 country of origin	Other Caribbean	695	0.30%
#8 country of origin	China excl. Taiwan	585	0.26%
#9 country of origin	Other Western Asia	520	0.23%
#10 country of origin	India	485	0.21%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

While the latest R/ECAP area maps are derived from 2011-2015 data, updated 2015-2019 data shows that Norfolk's Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) people born in India also comprise the largest proportion of foreign-born persons, at a total of 207 persons. Those from the Philippines are the second-largest foreign-born group living within R/ECAP areas in Norfolk at 177 persons.

Table 50: Countries of Origin in R/ECAP Regions, Norfolk, 2019

	Country	Number	Percent of Population
#1 country of origin	India	207	0.95%
#2 country of origin	Philippines	177	0.81%
#3 country of origin	Other South America	137	0.63%
#4 country of origin	Western Africa	130	0.60%
#5 country of origin	Eastern Africa	120	0.55%
#6 country of origin	Other Western Asia	94	0.43%
#7 country of origin	Other South Central Asia	71	0.33%
#8 country of origin	China excl. Taiwan	58	0.27%
#9 country of origin	Vietnam	45	0.21%
#10 country of origin	Canada	44	0.20%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

VII. Segregation and Integration

Key Data and Insights:

- While the minimum wage is \$11 per hour in Virginia, the “living wage” is almost double or more at almost every family configuration. (VIII.B.iii)
- Nine Norfolk public schools are currently identified for comprehensive or targeted improvement under the Every Student Succeeds Act (ESSA). Under ESSA, targeted improvement happens when certain subpopulations of students are underperforming while comprehensive improvement is for schools that are lower performing than the state. (VIII.B.v)
- Hispanic and Black students have a disproportionate rate of on-time graduation from high school and dropout rates compared to their White peers. (VIII.B.v)
- Similar to other major cities, Norfolk experiences relatively high levels of environmental contaminates. Norfolk’s EPA region is in the 80th to 100th percentile for diesel particulates, air toxics cancer risk, and air toxics respiratory hazard index (HI).
- EPA data indicates that the majority of residential units in Norfolk have the potential for exposure to lead from pre-1978 housing units.
- In reviewing the local opportunity access data from HUD, we found that high-opportunity neighborhoods are often adjacent to low-opportunity neighborhoods. For example, unemployment rates in some neighborhoods range from roughly two percent next to other areas that reach 29.7 percent. While not necessarily indicative of employment opportunities available within neighborhoods, this data point could (VIII.B.i)

City of Norfolk Actions:

- The City’s owner-occupied rehabilitation program addresses the issue of lead-based paint by incorporating education, reduction, and encapsulation for homes with identified lead hazards that are undergoing rehabilitation.
- In the FY 2023 budget, the City of Norfolk raised the minimum wage for City employees to \$18 for all full-time employees and \$15 for all part-time employees.
- In April 2022 the City of Norfolk and partnering cities broke ground on a 119-mile regional fiber ring, which will connect the cities of Virginia Beach, Norfolk, Chesapeake, Portsmouth, and Suffolk, and make high-speed, reliable internet available to all.

A. Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

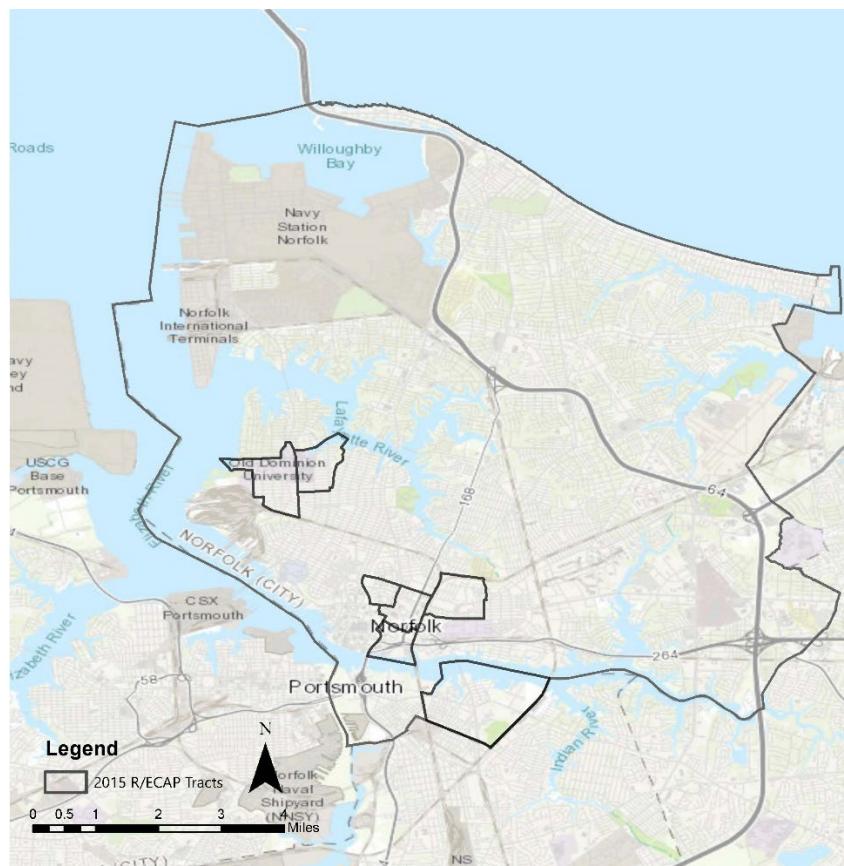
The U.S. Department of Housing and Urban Development (HUD) defines Racially and Ethnically Concentrated Areas of poverty (R/ECAP) based on census tracts that meet a racial/ethnic concentration threshold and a poverty test. More specifically, a R/ECAP area is a census tract that has a non-white population of 50 percent or more and where 40 percent or more of individuals live at or below the poverty line. To reflect regional and neighborhood differences

across the county, an area is also considered a R/ECAP if the poverty rate exceeds 40 percent or is three or more times the average census tract poverty rate for the area, whichever is lower.

i. Location of R/ECAPs

In 2015, there were seven Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in Norfolk, a decrease of 36 percent from 2010 when there were 11 R/ECAP areas. This indicates fewer concentrated areas of poverty that lack opportunities for communities of color living below the poverty threshold. The location of R/ECAP areas in Norfolk are shown in Figure 19. Note that some of the R/ECAP areas are concentrated around Old Dominion University and student populations can influence the data.

Figure 19: Norfolk R/ECAP Areas



Source: HUD Open Data Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), 2020.

ii. R/ECAP Demographics

Based on data released by HUD in 2020, 21,779 people lived in R/ECAP areas in Norfolk. As shown in

Table 51, R/ECAP areas primarily comprise of Black, Non-Hispanic persons who represent 72.08 percent of the population. The next largest populations in R/ECAP areas include White, Non-Hispanic residents who comprise 18.9 percent and Hispanic residents, who comprise 3.1 percent. All other racial groups each comprise less than one percent of residents in R/ECAP areas. Approximately 3,707 families reside within R/ECAP areas and 60.7 percent of them are families with children.

Table 51: R/ECAP Residents by Race/Ethnicity

R/ECAP Race/Ethnicity	Estimate	Percent
Total Population in R/ECAPs	21,779	-
White, Non-Hispanic	4,125	18.9%
Black, Non-Hispanic	15,699	72.1%
Hispanic	670	3.1%
Asian or Pacific Islander, Non-Hispanic	684	3.1%
Native American, Non-Hispanic	51	0.2%
Other, Non-Hispanic	38	0.2%
R/ECAP Family Type		
Total Families in R/ECAPs	3,707	-
Families with children	2,249	60.7%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/>

B. Segregation Levels

The Dissimilarity Index measures the level of segregation or integration within a city or community. A dissimilarity index represents a summary measure of the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. A dissimilarity index of 1 reflects complete segregation, where each tract has exclusively one of the two groups. A dissimilarity index less than 40 percent represents low segregation, 41-54 percent represents moderate segregation, and an index 55 percent or greater represents high segregation.

The 2020 dissimilarity indices show high segregation in Norfolk between White and all non-White racial and ethnic groups. Segregation between White and Black populations is highest when compared to other racial and ethnic groups. The segregation between white and non-white and white and Black both decreased between 1990 and 2010 but then has increased in the last 10 years. White and Hispanic persons and White and Asian or Pacific Islander are both low segregation indices. This segregation has also increased in the last 10 years. Because segregation leads to disproportionate access to opportunity and quality of life issues relating to schools, job opportunities, park access, housing, or crime, this is an important trend to note.

Table 52: Racial and Ethnic Dissimilarity Index

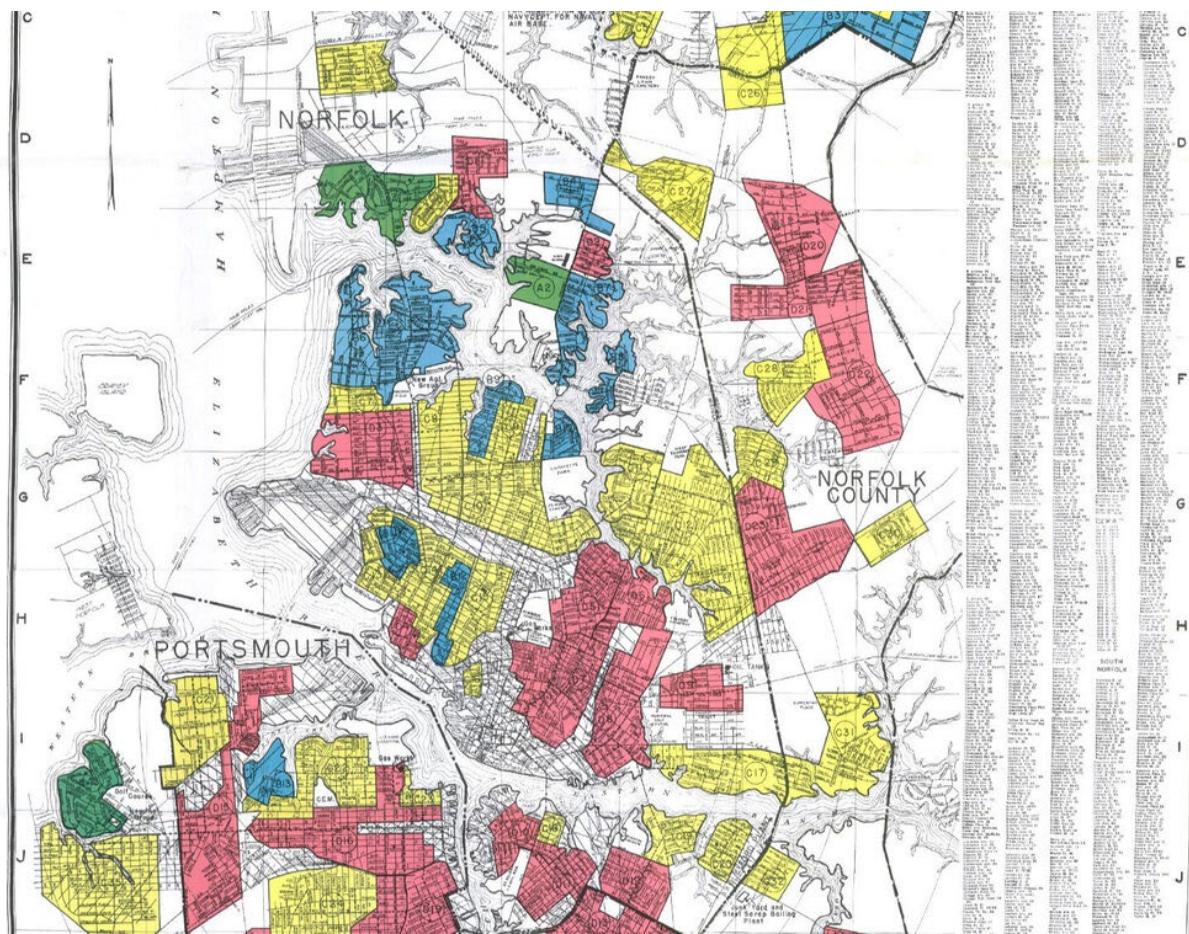
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	53.93	45.9	43.14	47.84
Black/White	60.35	52.7	50.8	55.11
Hispanic/White	26.24	28.22	26.78	33
Asian or Pacific Islander/White	25.93	25.16	25.09	30.31
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: https://egis.hud.gov/affht/				

i. Historic Segregation

As part of the New Deal, the U.S. government created the Federal Housing Administration (FHA) to make home ownership more affordable for Americans. The FHA provided low interest loans to potential homeowners and contracted another federal department, the Homeowners' Loan Corporation (HOLC) to create maps of every major American city to show the financial "riskiness" of investing in each neighborhood. In the 1930s and 1940s, the HOLC created "Residential Security" maps of most major cities including Norfolk. These maps documented how loan officers, appraisers, and real estate professionals evaluated mortgage lending risk during the era immediately before the surge of suburbanization in the 1950s. Neighborhoods considered high risk or "Hazardous" were often "redlined" by lending institutions, denying them access to capital investment which could improve the housing and economic opportunity of residents. Neighborhood risk was often directly coincided with the racial makeup of neighborhoods, with whiter neighborhoods being deemed less risky.

For decades after these maps were made, the FHA and private lenders utilized these maps to determine which loans to approve. This made it easier for white residents to buy homes and build generational wealth and difficult for Black residents to buy homes. The grading system also incentivized buying homes in the suburbs, which drove significant suburban expansion. Speculators often bought the remaining homes and became slumlords or created predatory contract deeds. At the same time, redlined neighborhoods experienced disinvestment of government resources in transportation, education, housing, parks, etc. Figure 20 is an image of the HOLC redlining map of Norfolk. The colors show green areas "best" to red areas as "high risk" or "hazardous." The area descriptions used to rate the areas would include favorable influences like distance to employment and detrimental influences like "different racial groups." The descriptions listed the percent of foreign-born and Black families, as well as estimated annual family income.

Figure 20: Norfolk 1940s HOLC Map



Source: Mapping Inequality/ University of Richmond

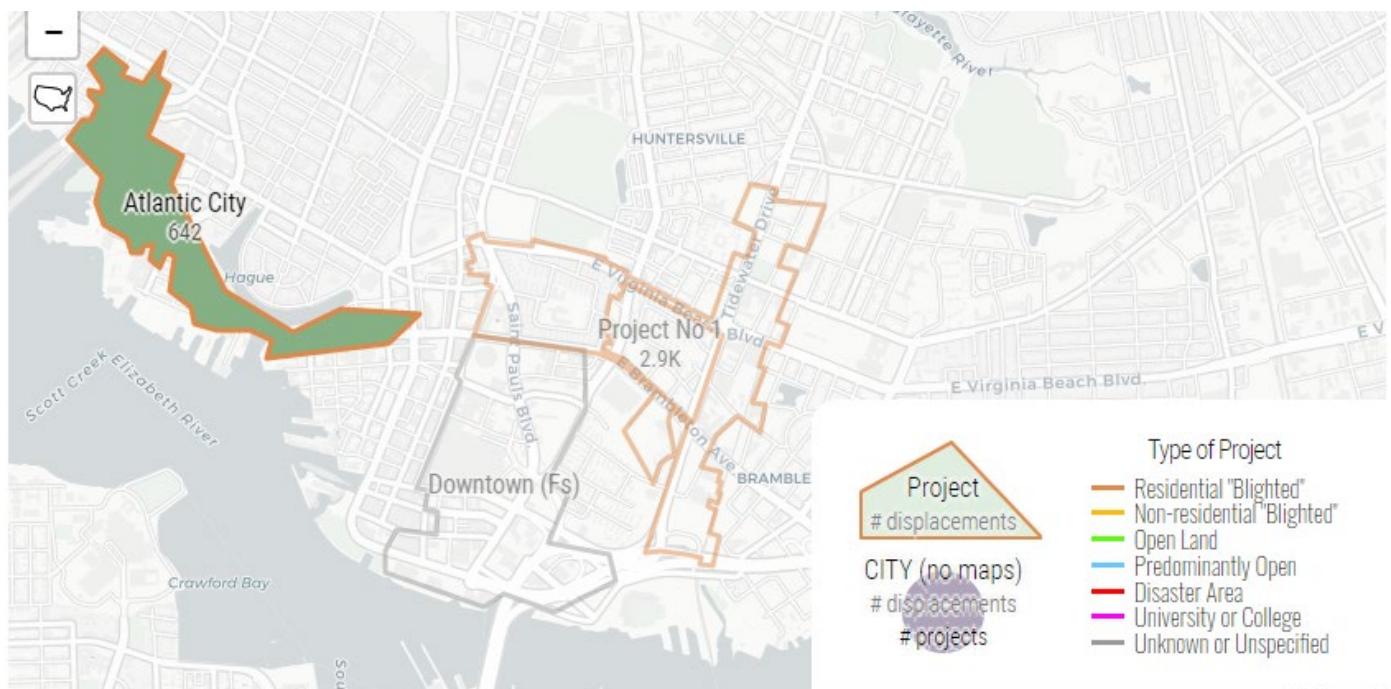
As white residents fled to suburbs in cities across America, many cities used federal urban renewal funds to build highways for suburbanites to access jobs more easily in the downtown core and other projects to “revitalize” the inner core. Many of those projects displaced residents of Norfolk, mostly displacing Black and African American residents.

Figure 21 shows a map of the two major displacement projects in Norfolk: Atlantic City which displaced 642 households and Project Number 1 which displaced 2,900 households. According to the renewing inequality project through the University of Richmond, “by the late 1960s, an estimated 5,194 families had been displaced by urban renewal projects in Norfolk, 85 percent of which were families of color.”³⁸

Figure 21: Displacement Projects during Urban Renewal Norfolk

³⁸ Richmond.edu,

<https://dsl.richmond.edu/panorama/renewal/#view=0/0/1&viz=cartogram&city=norfolkVA&loc=14/36.8540/-76.2890>



Source: University of Richmond, Urban Renewal 1950-1966

Around this time, cities around the United States were also changing zoning ordinances to eliminate "blight" and entice suburbanites to move back to the city. The primary changes of the zoning code were downzoning areas that historically had more housing variety and multi-family housing so that they would be single-family only.

Figure 21 shows an image of the 1967 General Plan land use map. In this plan, brown is high density, orange is medium density, and yellow is low-density residential.

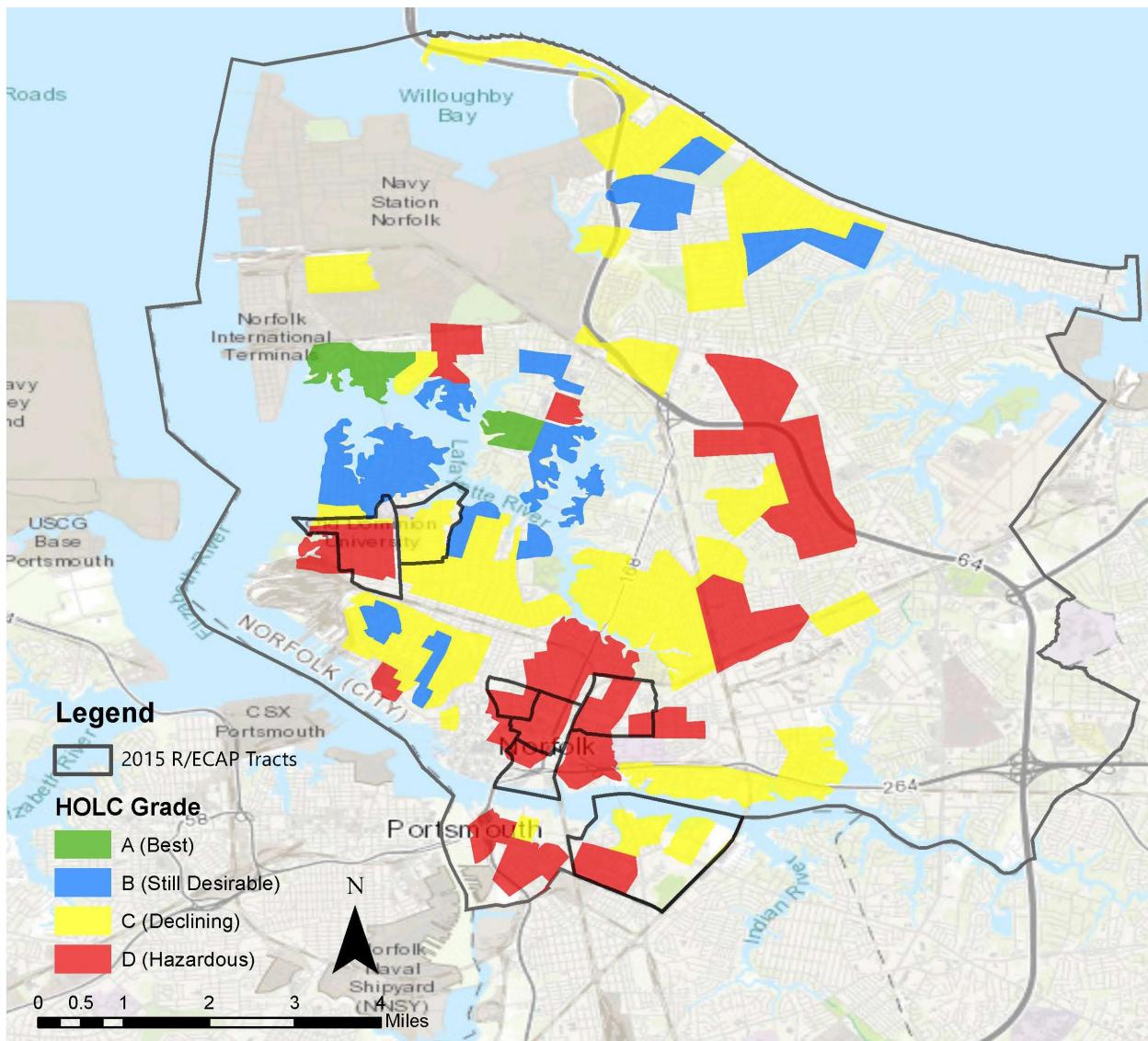
Figure 22: 1967 General Plan Land Use Map



Source: Old Dominion University, Lambert's Point Research Website

The Federal Housing Administration continued discriminatory practices, reinforcing residential segregation in cities including Norfolk. The discriminatory practices captured by the HOLC maps continued legally until 1968 when the Fair Housing Act banned racial discrimination in housing. The figure below shows how historic redlining aligns with HUD's measure of the seven R/ECAP areas based on 2011-2015 data, showing that patterns of economic and racial residential segregation are still evident today as all R/ECAP areas line up with areas that the HOLC rated as C or D. Understanding these historical and current segregation patterns is key to understanding fair housing choice and inform impediments and actions outlined in this document.

Figure 23: HOLC and R/ECAP Map



Source: Data from Mapping Inequality, University of Richmond

C. Families with Children

Understanding opportunities for family households, particularly households with children is central to understanding neighborhood access across Norfolk. In 2019, 57.1 percent of all households were families and 25.8 percent were family households with children. Eight percent of all households in Norfolk are female householders with children and no partner present.

Table 53: Households with Children, 2019, Norfolk

	Estimate	Percent
Family Household	50,487	57.1%
Family household with children	22,769	25.8%
Married-couple households	30,916	35.0%
Married-couple households with children	12,084	13.7%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

D. Limited English Proficiency Population

HUD defines Limited English Proficiency (LEP) as a person's limited ability to read, write, speak, or understand English. Persons who are LEP, however, are not a protected class under the Fair Housing Act. Nonetheless, the Act prohibits housing providers from selectively using language access as a pretext for discrimination. The Act also prohibits housing providers from using LEP in a way that causes an unjustified discriminatory effect.

Just under two percent of the City of Norfolk's households are considered LEP. Of this population, the majority speak Spanish (21.4 percent) and Asian and Pacific Island languages (18.2 percent).

Table 54: Limited English-Speaking Households, 2019, Norfolk

	Total	Limited English-speaking households	Percent limited-English speaking households
All households	88,353	1,685	1.9%
Households speaking --			
Spanish	4,834	1,033	21.4%
Other Indo-European languages	2,307	175	7.6%
Asian and Pacific Island languages	2,533	460	18.2%
Other languages	781	17	2.2%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

VIII. Access to Opportunity

Key Data and Insights:

- While the minimum wage is \$11 per hour in Virginia, the “living wage” is almost double or more at almost every family configuration. (B.iii)
- Nine Norfolk public schools are currently identified for comprehensive or targeted improvement under the Every Student Succeeds Act (ESSA). Under ESSA, targeted improvement happens when certain subpopulations of students are underperforming while comprehensive improvement is for schools that are lower performing than the state. (B.v)
- Hispanic and Black students have a disproportionate rate of on-time graduation from high school and dropout rates compared to their White peers. (B.v)
- Similar to other major cities, Norfolk experiences relatively high levels of environmental contaminates. Norfolk’s EPA region is in the 80th to 100th percentile for diesel particulates, air toxics cancer risk, and air toxics respiratory hazard index (HI).
- EPA data indicates that the majority of residential units in Norfolk have the potential for exposure to lead from pre-1978 housing units.
- In reviewing the local opportunity access data from HUD, we found that high-opportunity neighborhoods are often adjacent to low-opportunity neighborhoods. For example, unemployment rates in some neighborhoods range from roughly two percent next to other areas that reach 29.7 percent. While not necessarily indicative of employment opportunities available within neighborhoods, this data point could (B.i)

City of Norfolk Actions:

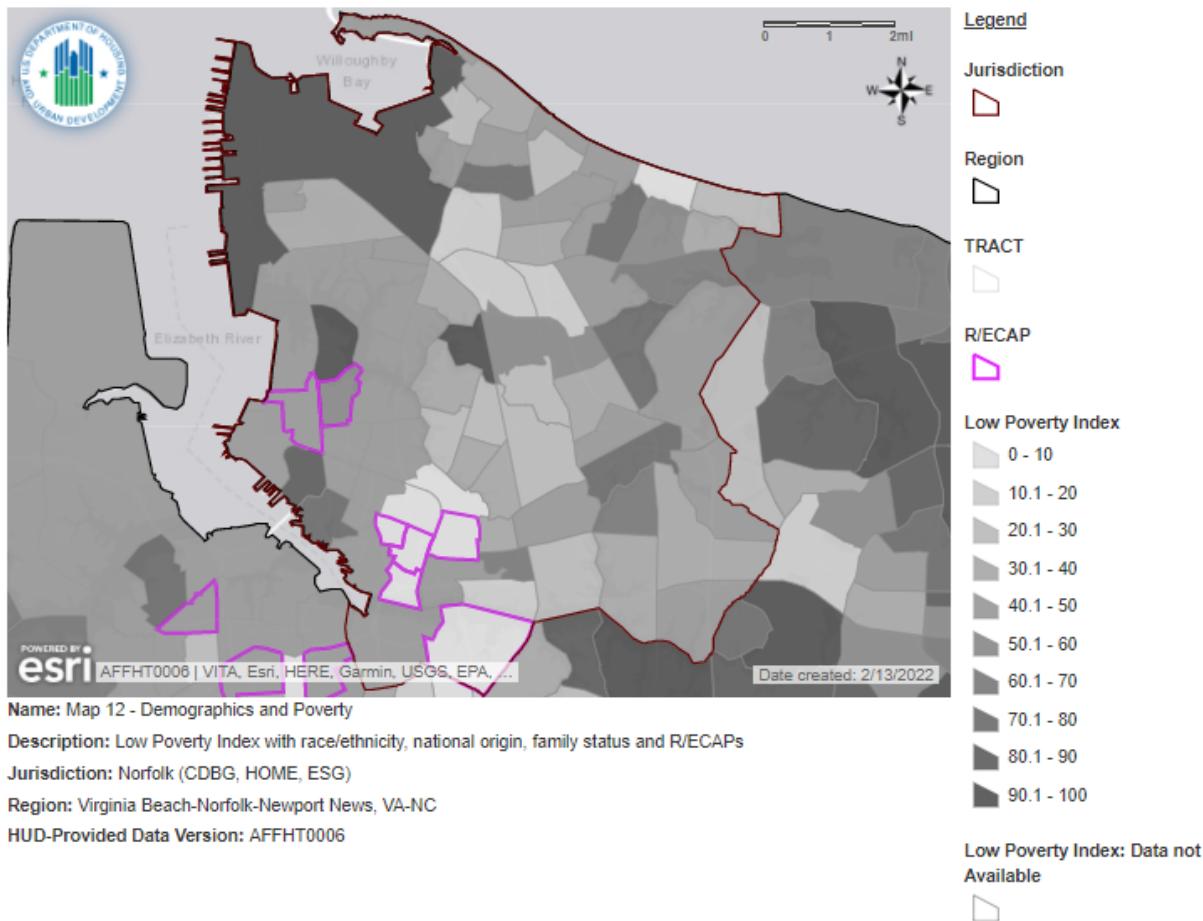
- The City’s owner-occupied rehabilitation program addresses the issue of lead-based paint by incorporating education, reduction, and encapsulation for homes with identified lead hazards that are undergoing rehabilitation.
- In the FY 2023 budget, the City of Norfolk raised the minimum wage for City employees to \$18 for all full-time employees and \$15 for all part-time employees.
- In April 2022 the City of Norfolk and partnering cities broke ground on a 119-mile regional fiber ring, which will connect the cities of Virginia Beach, Norfolk, Chesapeake, Portsmouth, and Suffolk, and make high-speed, reliable internet available to all.

A. Overview of HUD-Defined Opportunity Factors

i. Low Poverty Index

As shown in the map below, Norfolk's most impoverished neighborhoods are dispersed throughout the city but also concentrated in the south with most R/ECAP areas experiencing higher poverty. This index captures the poverty in each neighborhood based on the poverty rate with higher scores having less exposure to poverty.³⁹

Figure 24: Low Poverty Index Map



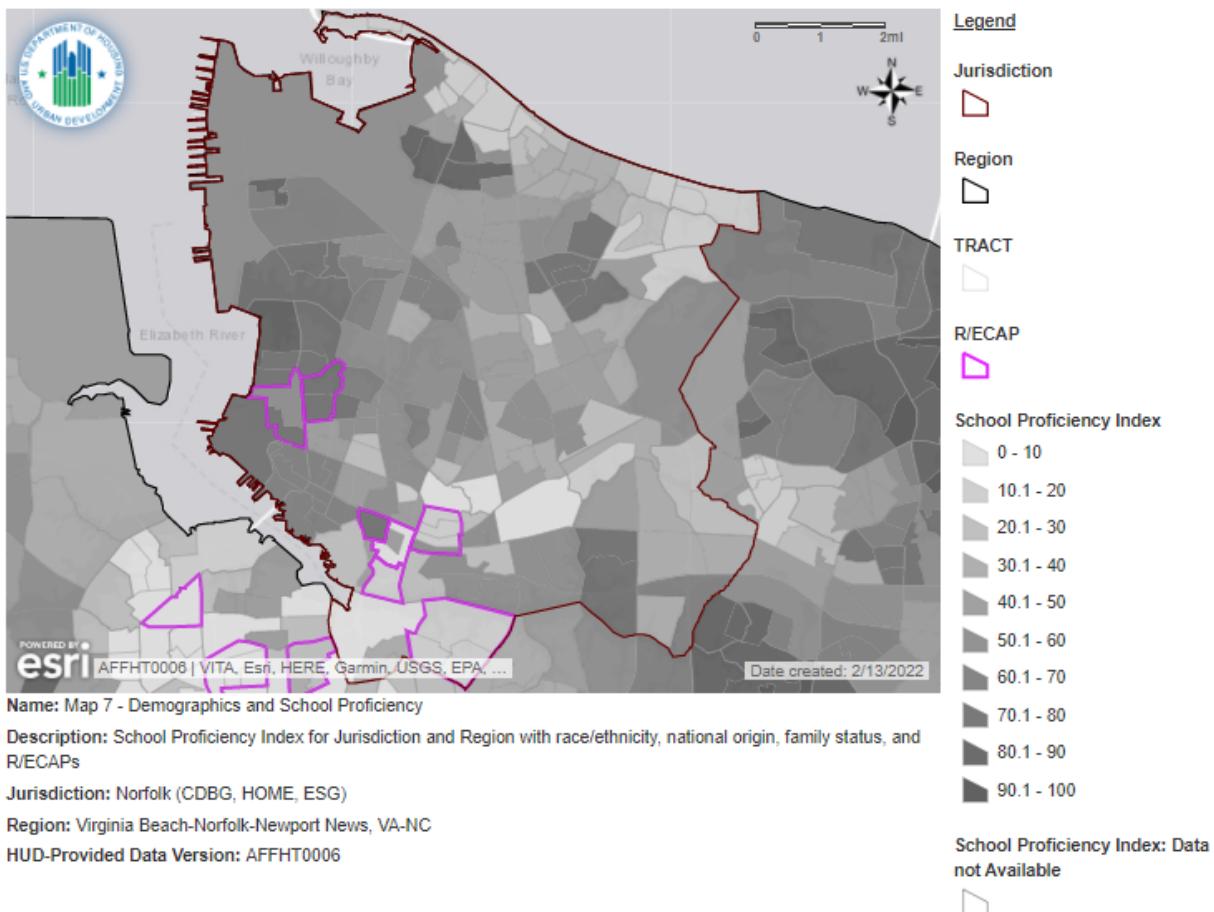
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

³⁹ HUD Low Poverty Index, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-poverty-index/about>

ii. School Proficiency Index

Figure 25 illustrates that the R/ECAP areas have a range of school proficiency levels, mostly between 0 and 30. According to HUD, the school proficiency index measures the percent of 4th graders proficient in reading (r) and math (m). High scores represent a better-quality school system. Norfolk's lowest performing schools are concentrated around the south and northside of the city.⁴⁰

Figure 25: School Proficiency Index Map



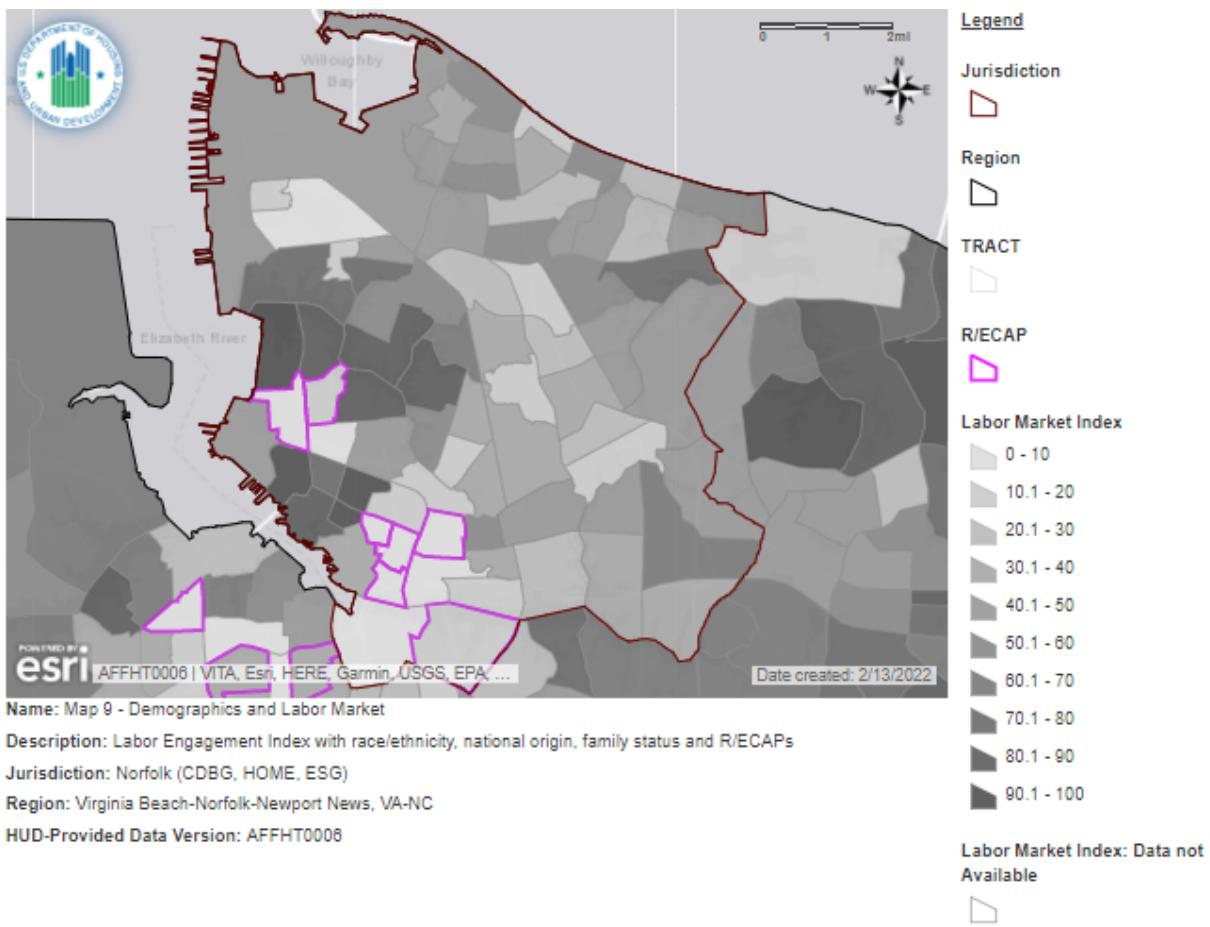
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

⁴⁰ HUD School Proficiency Index, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::school-proficiency-index/about>

iii. Labor Market Engagement Index

The below map indicates that labor engagement is lower in the R/ECAP areas. The labor market engagement index is a combination measure of unemployment rate, labor force participation rate, and percent with a bachelor's degree or higher. For labor market index, lower scores indicate lower labor force participation and human capital.⁴¹

Figure 26: Labor Market Engagement Map



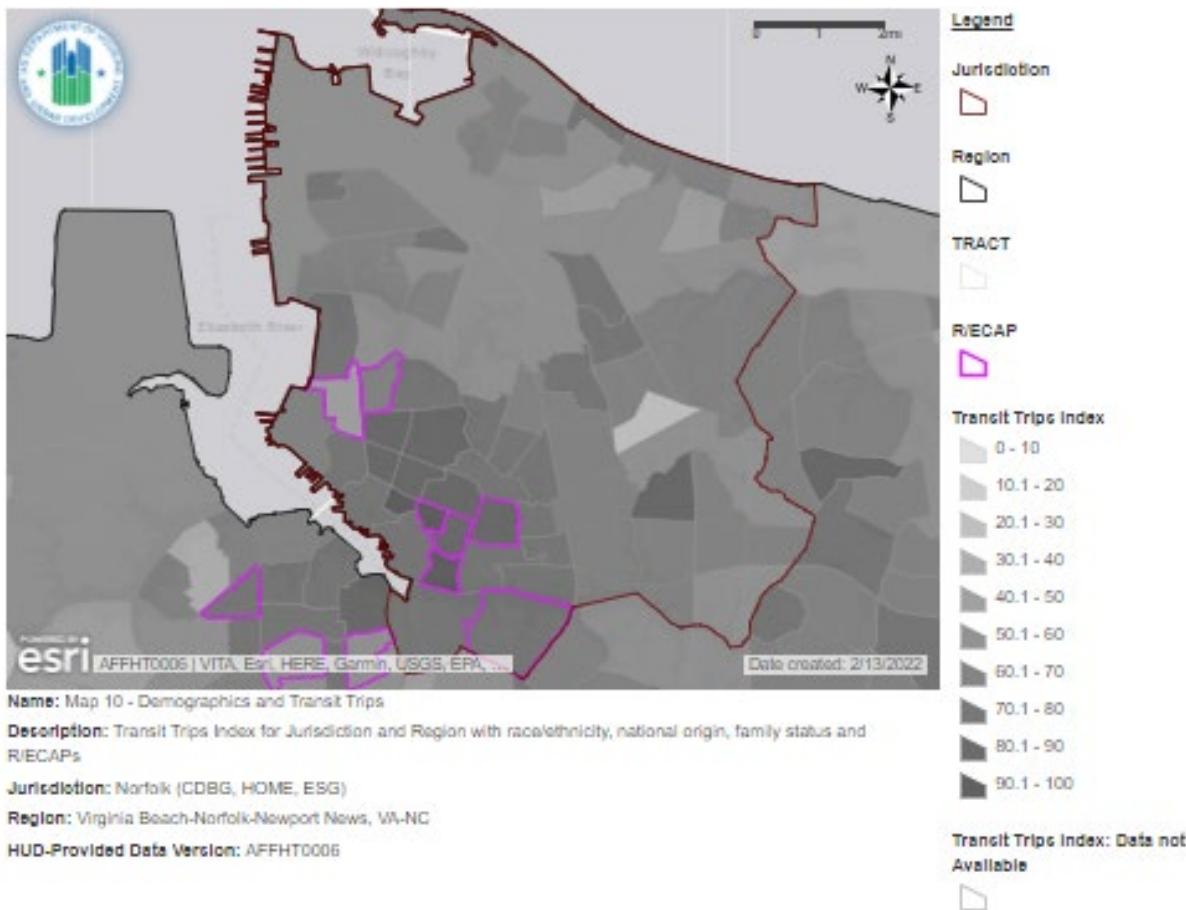
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

⁴¹ HUD Labor Market Engagement Index, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::labor-market-engagement-index/about>

iv. Transit Index

As shown in Figure 27, most neighborhoods in Norfolk have higher transit trip index scores. This index is based on estimates of transit trips taken by a three-person single-parent family with income at 50 percent the area median income for renters of the region. Higher index scores indicate a higher likelihood that residents utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.⁴²

Figure 27: Transit Index Map



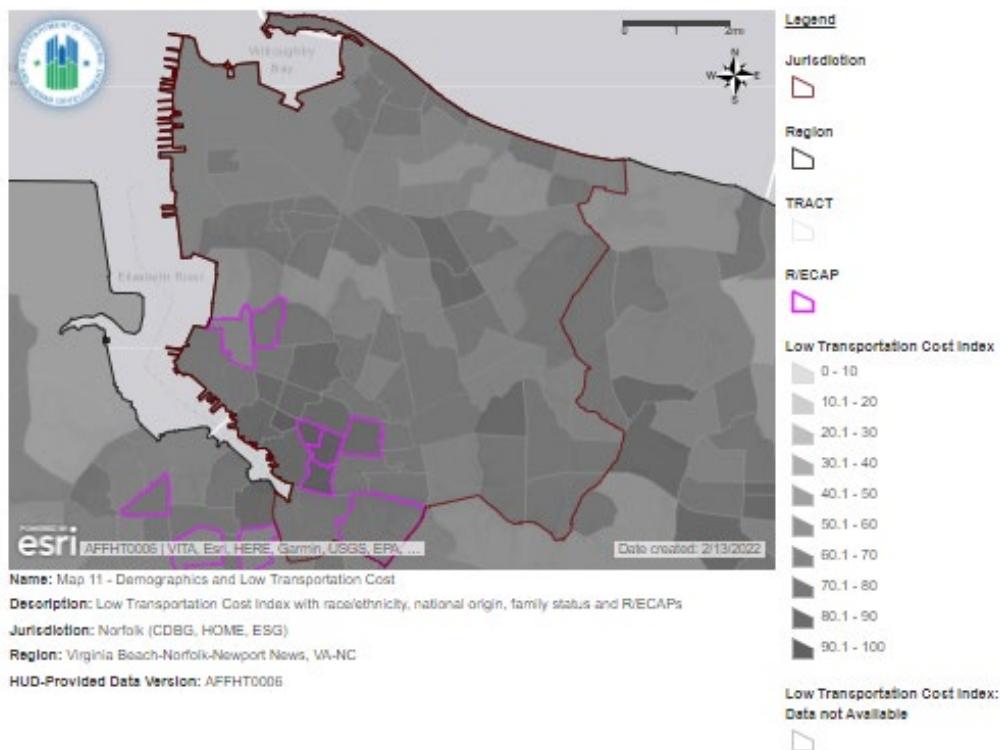
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

⁴² AFFH-T Data Documentation, <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

v. Low Transportation Cost Index

As shown in Figure 28, the R/ECAP areas of Norfolk have a range of low transportation cost index values. According to HUD, the low transportation cost index measure is based on the Location Affordability Index (LAI). Transportation costs may be low due to better public transportation access, higher home, service, and job density, and other reasons. The index is based on transportation expense estimates for “a three-person single-parent family with income at 50 percent of the median income for renters for the region.”⁴³

Figure 28: Low Transportation Cost Index Map



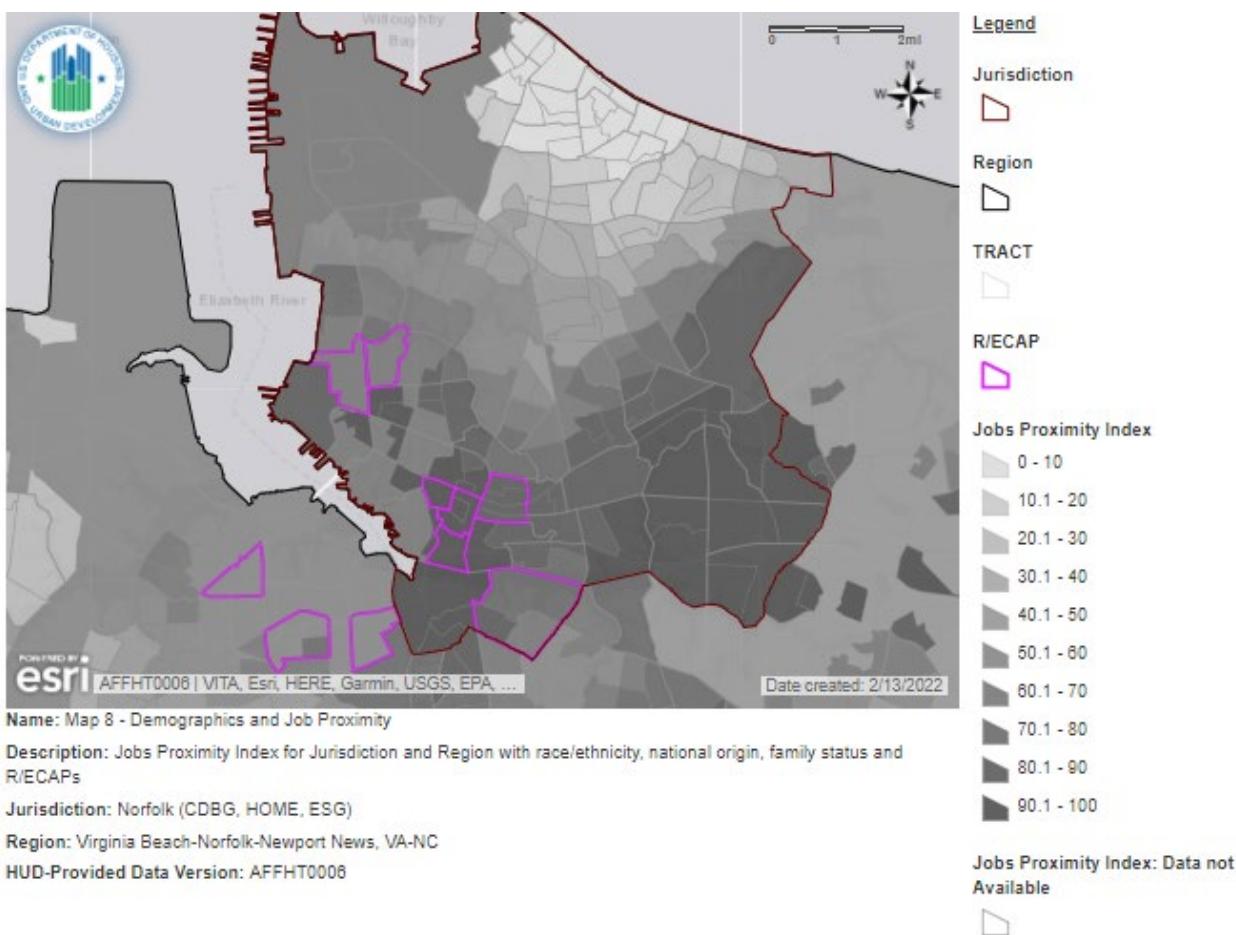
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

⁴³ HUD Low Transportation Cost Index, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-transportation-cost-index/about> Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the transportation cost index, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

vi. Jobs Proximity Index

According to Figure 29, most of Norfolk outside the north of the city is highly ranked on the jobs proximity index. According to HUD, the jobs proximity index “quantifies the accessibility of a given residential neighborhood (Census Block Group) as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.”⁴⁴ Because higher index values indicate better access to employment opportunities, most of Norfolk has better access with a spread amongst R/ECAP areas.

Figure 29: Jobs Proximity Index



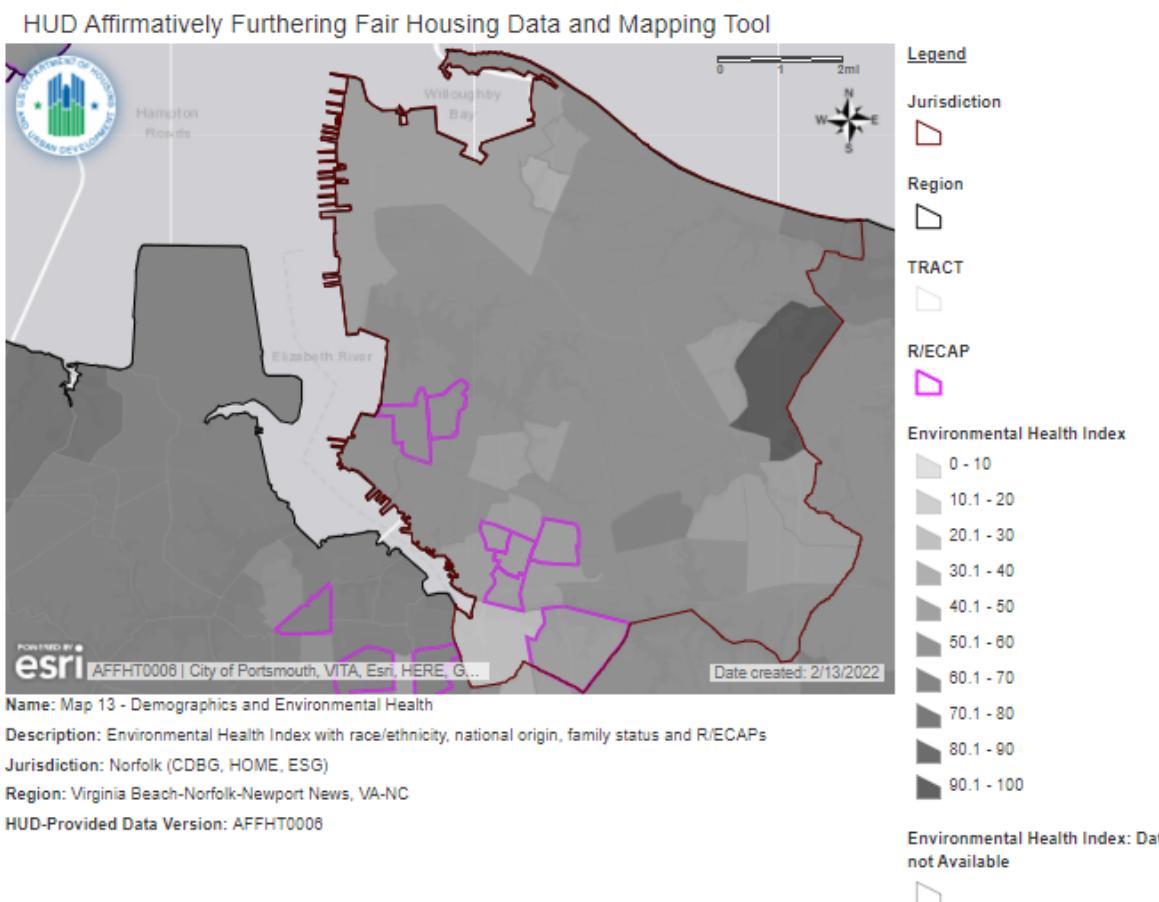
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

⁴⁴ HUD Jobs Proximity Index, <https://hudgis-hud.opendata.arcgis.com/datasets/jobs-proximity-index/explore?location=43.359979%2C-121.736030%2C3.26>

vii. Environmental Health Index

As shown in Figure 30, most R/ECAP areas in Norfolk have low environmental health index values. According to HUD, the environmental health hazard exposure index “summarizes potential exposure to harmful toxins at a neighborhood level.” The health hazards include airborne carcinogenic, respiratory, and neurological hazards. Lower index values indicate neighborhoods with worse environmental quality.⁴⁵

Figure 30: Environmental Health Index by Census Tract



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/> There are seven R/ECAP areas shown in this map due to the AFFH maps using 2011 – 2015 5-Year ACS data. Note that three of the highlighted areas are outside the City of Norfolk.

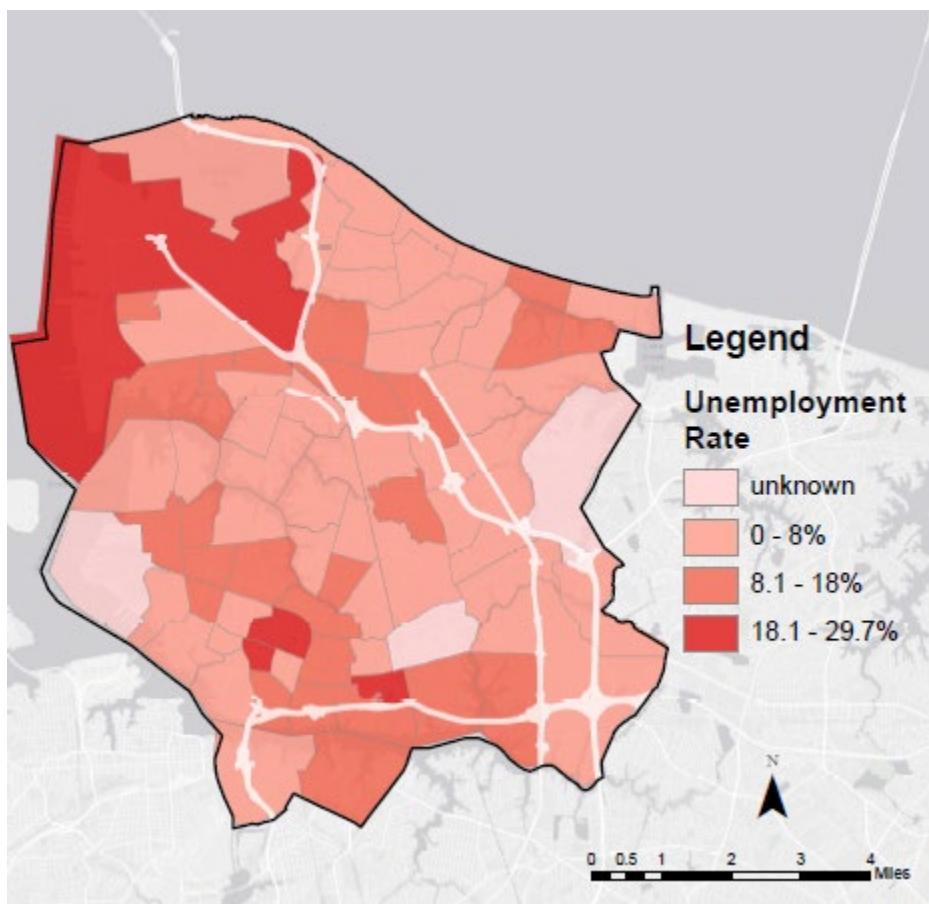
⁴⁵ HUD Environmental Health Hazard, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::environmental-health-hazard-index/about>

B. Local Opportunity Factors

i. Unemployment

The map below shows the unemployment status for civilian population 16 years and older in 2019. The lowest unemployment rates are around the naval base and downtown while the highest are in the south of the city and scattered around the middle. Some census tracts with the lowest unemployment rate neighbor census tracts with the highest unemployment rate. Some census tracts have up to 12.1 percent unemployment—above city and national averages.

Figure 31: Unemployment Rate by Census Tract



Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates.

ii. Occupation by Industry

It is important to consider the occupations of Norfolk residents relative to job mobility and access to economic opportunity. Educational Services, Health Care, and Social Assistance comprise 23.1 percent of the employed population over 16—the largest share of jobs in Norfolk. These jobs are typically stable but do not necessarily offer high wage mobility. This is

followed by Arts, Entertainment, and Recreation, and Accommodation and Food Services at 12.8 percent, which are often considered vulnerable to economic and natural disasters in addition to being more precarious and wage based. Professional, Scientific, and Management, and Administrative and Waste Management Services follow at 11.7 percent, which are typically higher paying, more stable, and offer mobility opportunities.⁴⁶

Table 55: Occupations by Industry, Norfolk, 2019

Industry	Estimate	Percent
Civilian employed population 16 years and over	104,945	100%
Educational services, and health care and social assistance	24,213	23.1%
Arts, entertainment, and recreation, and accommodation and food services	13,414	12.8%
Professional, scientific, and management, and administrative and waste management services	12,262	11.7%
Retail trade	11,758	11.2%
Public administration	9,144	8.7%
Manufacturing	7,406	7.1%
Construction	7,320	7.0%
Finance and insurance, and real estate and rental and leasing	6,005	5.7%
Transportation and warehousing, and utilities	5,165	4.9%
Other services, except public administration	4,595	4.4%
Information	1,804	1.7%
Wholesale trade	1,723	1.6%
Agriculture, forestry, fishing and hunting, and mining	136	0.1%

Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

⁴⁶ Visualizing vulnerable jobs across America: A tool to understand your local economy and inform its recovery, Brookings Institution, <https://www.brookings.edu/blog/up-front/2020/07/28/visualizing-vulnerable-jobs-across-america-a-tool-to-understand-your-local-economy-and-inform-its-recovery/>

iii. Minimum Wage

The minimum wage in Virginia is \$11.00. In contrast, the Massachusetts Institute of Technology (MIT) has calculated a wage that would support various family configurations⁴⁷ and shows that Norfolk's "Living Wage" is more than minimum wage and more than double the minimum wage for almost every configuration as shown in Table 56: Norfolk Living Wage 2022. According to the MIT calculator, living wage is determined based on the expense of necessary, non-luxury items including food, childcare (calculated at zero if no children), medical, housing, transportation, civic, and other.

Table 56: Norfolk Living Wage 2022

	1 Adult				2 Adults (1 Working)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$16.33	\$31.32	\$38.52	\$50.16	\$24.57	\$29.51	\$33.12	\$36.61
Poverty Wage	\$6.13	\$8.29	\$10.44	\$12.60	\$8.29	\$10.44	\$12.60	\$14.75
Minimum Wage	\$11	\$11	\$11	\$11	\$11	\$11	\$11	\$11

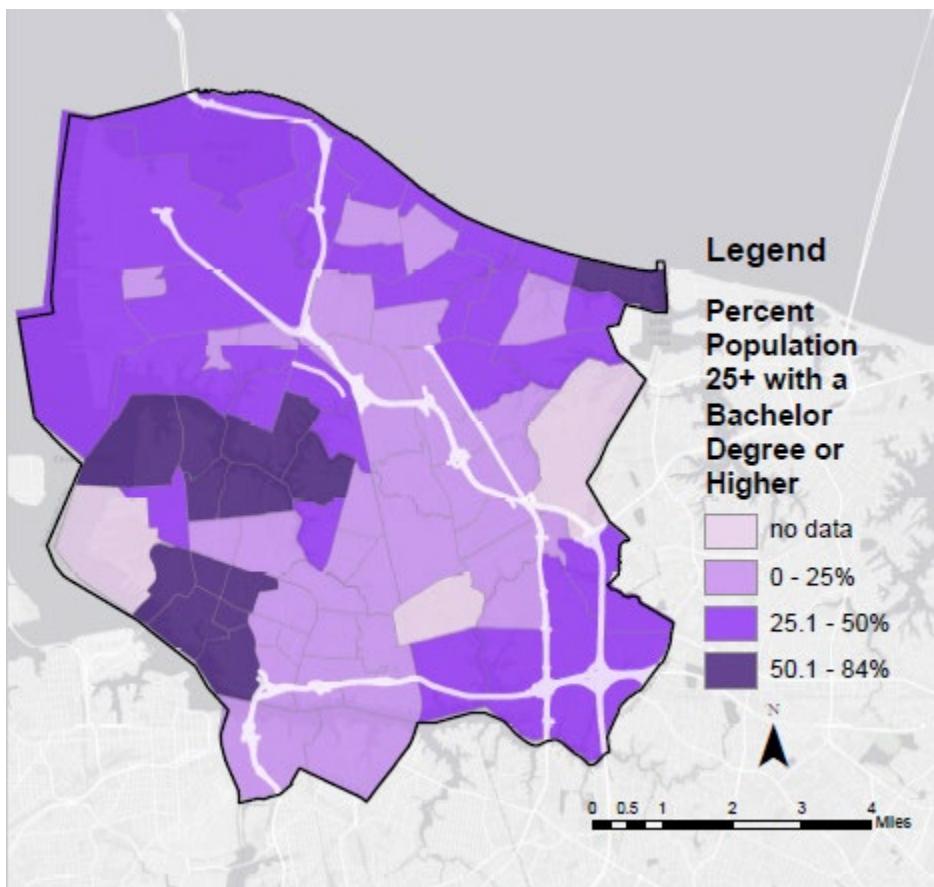
Source: MIT Living Wage Calculator

⁴⁷ [Living Wage Calculator - Living Wage Calculation for Norfolk city, Virginia \(mit.edu\)](https://mit.livingwagecalculator.org/city/norfolk)

iv. Education Attainment

Figure 32 shows the percent of residents with a bachelor's degree or higher in the City of Norfolk. The map aligns with the previous poverty map and shows that areas with higher educational attainment often have lower poverty and better access to other opportunities. Many of the most educated tracts are concentrated in or near downtown. At the same time, some of the tracts with the lowest percent of bachelor's degrees or higher directly neighbor the tracts with the highest percent of bachelor's degrees or higher.

Figure 32: Percent with Bachelor's Degree or Higher by Census Tract



Source: US Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

v. Education Quality

Norfolk has 51 total schools with an enrollment of 27,955 students. Public school students in Norfolk live in households that are disproportionately more renter-occupied (63.9 percent). This is important, because high eviction rates against renters may have disproportionate effects to the children in those households. Twenty-six percent of public-school students live in

families with income below the poverty level, and 16.6 percent of students live in households with limited broadband access—something that may impact their educational performance⁴⁸.

Currently, nine Norfolk public schools are identified for comprehensive or targeted improvement under the Every Student Succeeds Act (ESSA) including Azalea Gardens Middle, Blair Middle, Chesterfield Academy Elementary, Jacox Elementary, James Monroe Elementary, Lake Taylor Middle, Lindenwood Elementary, Richard Bowling Elementary, and William H. Ruffner Middle, with Azalea Gardens Middle and Blair Middle identified for targeted improvement for students with disabilities and the remaining seven for comprehensive improvement.⁴⁹ Under ESSA, targeted improvement happens when certain subpopulations of students are underperforming while comprehensive improvement is for schools that are lower performing than the state. Schools are identified for comprehensive support one of three ways: the school is the lowest-performing five percent of all schools, the high school has one-third or more students not graduating, or the school was a targeted support school for three years and did not make progress moving student groups out of the “consistently underperforming” category.⁵⁰

The table below illustrates that there is inequity among school success in Norfolk with Hispanic and Black students having the lowest on-time graduation rates and highest drop-out rates.

Table 57: Norfolk Graduation and Drop Out Rate, 2021

	Virginia On-Time Graduation Rate (%)	Dropout Rate (%)
American Indian	100	0
Asian	98	2
Black	82.8	9.5
Hispanic	82.3	14.3
Native Hawaiian	*	*
White	92.1	3.4
Multiple Races	89.8	5.1

Source: Virginia State Level Cohort Report, 2021 *Native Hawaiian does not have representative data.

⁴⁸ National Center for Education Statistics – Norfolk, <https://nces.ed.gov/Programs/Edge/ACSDashboard/5102670>

⁴⁹ Virginia Department of Education ESSA Support Schools,

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.doe.virginia.gov%2Fstatistics_reports%2Faccredit%2Ffederal%2Ffederal%2Freports%2F2020-21%2Fessa-support-schools-2020-2021.xlsx&wdOrigin=BROWSELINK

⁵⁰ Washington Education Association “What does it mean to be identified as a Comprehensive Support School?”, https://www.washingtonea.org/file_viewer.php?id=12171

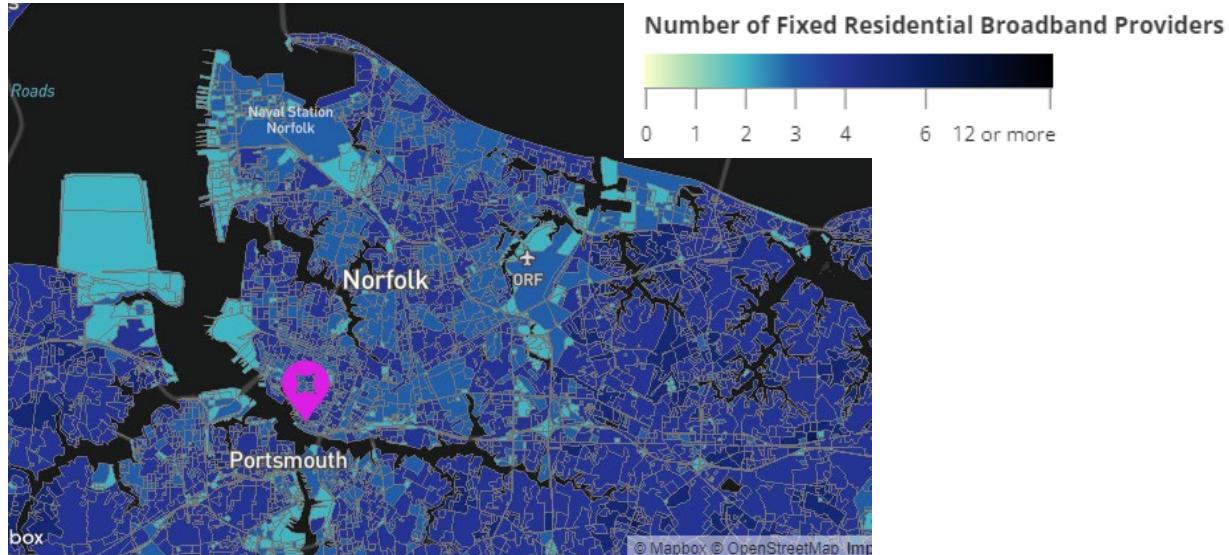
vi. Broadband Access

Throughout the United States, there is a significant gap between those who have access to the internet and those who do not. The divide is perpetuated by limitations that are geographical as well as financial, where persons cannot afford to pay a monthly service fee for Broadband service (an internet connection fast enough to stream a video). Nationwide, fewer than half of households living on or under \$20,000 are connected. This lack of internet access in communities is known to contribute to a deficit in opportunity, education, and other prospects.⁵¹

Figure 33 below shows the number of fixed broadband providers. While the figure shows the number of providers available, it does not reflect the household level usage of broadband. From a fair housing perspective, ensuring that residential broadband is available to housing projects both within and in the outskirts of the city will support community viability and improve the quality of life for residents.

In April 2022 the City of Norfolk and partnering cities broke ground on a 119-mile regional fiber ring, which will connect the cities of Virginia Beach, Norfolk, Chesapeake, Portsmouth, and Suffolk, and make high-speed, reliable internet available to all.⁵²

Figure 33: Number of Fixed Residential Broadband



Source: Federal Communications Commission (FCC) Fixed Broadband Deployment, 2021

⁵¹ Time “The Digital Divide: A Quarter of the Nation is Without Broadband”, <https://time.com/4718032/the-digital-divide/#:~:text=Among%20the%20quarter%20of%20Americans%20without%20broadband%E2%80%93basically%20a,of%20households%20living%20on%20under%20%2420%2C000%20are%20connected.>

⁵² [Editorial: Regional network shows promise – The Virginian-Pilot \(pilotonline.com\)](https://www.pilotonline.com/editorial/editorial-regional-network-shows-promise)

C. Environmental Justice and Health

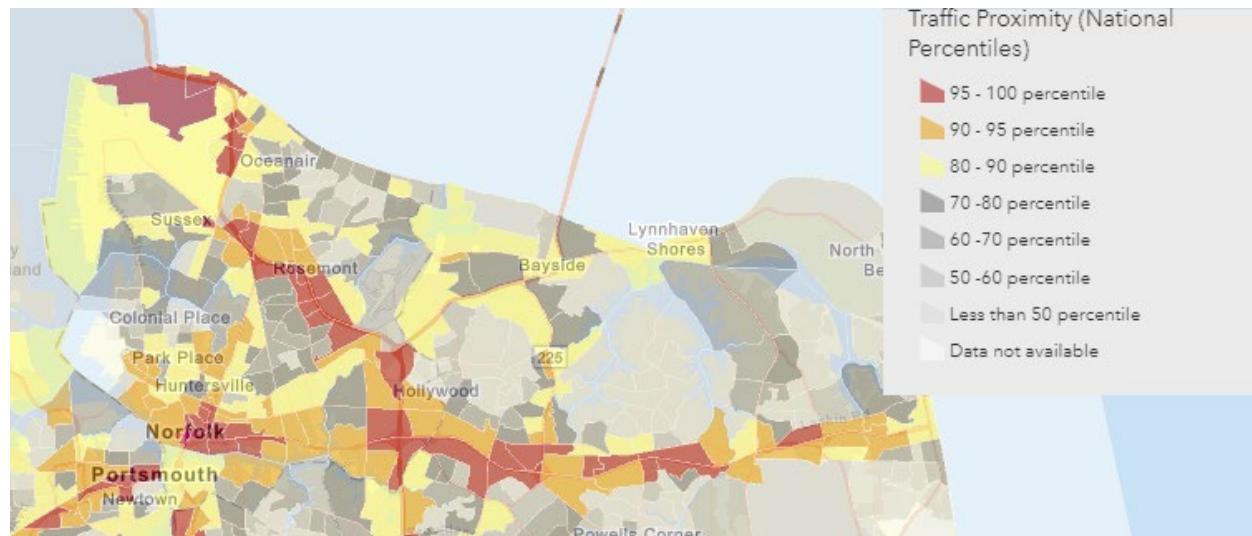
Similar to other major U.S. cities, Norfolk has a high concentration of environmental contaminates. The table below shows that traffic proximity is over twice the amount of the national average and in the 89th percentile nationwide. The table also shows that the city is in the 80th to 90th nationwide percentile for diesel particulates, air toxics cancer risk, and air toxics respiratory HI. At the same time, Norfolk is significantly lower than the national average for particulate matter and ozone.

Table 58: Environmental Indicator Comparison

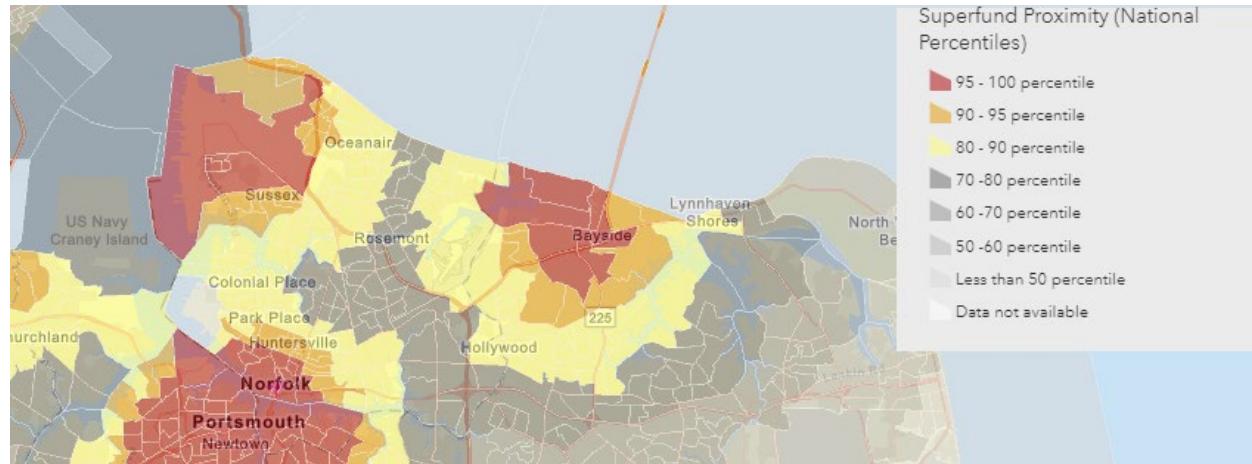
Pollution and Sources	Norfolk	Compared to Virginia		Compared to United States	
		Average	Percentile	Average	Percentile
Particulate Matter 2.5 (ug/m3)	6.91	7.55	24	8.74	11
Ozone (ppb)	40.1	40.1	47	42.6	32
2017 Diesel Particulate Matter (ug/m3)	0.42	0.238	90	0.295	80-90th
2017 Air Toxics Cancer Risk (risk per MM)	31	31	86	29	80-90th
2017 Air Toxics Respiratory HI	0.45	0.36	97	0.36	80-90th
Traffic Proximity (daily traffic count/distance to road)	1500	660	89	710	89
Lead Paint (% pre-1960s housing)	0.47	0.21	87	0.28	75
Superfund Proximity (site count/km distance)	0.31	0.11	95	0.13	91
RMP Facility Proximity (facility count/km distance)	0.51	0.38	78	0.75	60
Hazardous Waste Proximity (facility count/km distance)	1.8	0.65	91	2.2	68
Underground Storage Tanks	3	1.8	78	3.9	67
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.004	6.2	86	12	61
Source: EPA Environmental Justice Screen					

The maps in Figure 34 and Figure 35 show the traffic proximity and superfund site proximity by block group in Norfolk. The maps show that certain neighborhoods of the city are more exposed to pollutants. The maps also show that some of the elevated risk levels can be connected to the three superfund sites located around the exterior of Norfolk.

In interviews, stakeholders mentioned high rates of asthma and other respiratory illness, and mentioned mold as another environmental hazard, that was posited to affect to lower income households.

Figure 34: EPA Traffic Proximity Map

Source: EPA Environmental Justice Screen

Figure 35: Superfund Proximity Map

Source: EPA Environmental Justice Screen

i. Lead-Based Paint

Across the United States, lead-based paint was widely used in properties prior to the 1970s. In 1978, the US banned the use of lead-based paint in residential properties. Today the CDC estimates that 29 million housing units contain lead-based paint hazards.⁵³ No safe blood lead

⁵³ Centers for Disease Control and Prevention, [Lead in Paint | Sources of Lead | CDC](#)

level in children has been identified. Even low levels of lead in blood have been shown to negatively affect a child's intelligence, ability to pay attention, and academic achievement.

The map on the next page displays public data provided by the U.S. Environmental Protection Agency (EPA) to indicate where the highest potential for exposure to lead-based paint exists throughout Norfolk based on the age of the housing units in each census block group. Lead was banned for residential use in 1978. As described in other parts of this report, more than half of Norfolk's homes were built before 1959. EPA data indicates most of the city has the potential for unhealthy exposure to lead from pre-1978 housing units.

To reduce the presence of lead in older housing stock, HUD oversees compliance with the Lead Safe Housing Rule (LSHR) which requires that all federally assisted housing meet certain lead clearance requirements, depending on the nature of the work and the dollar amount of the federal investment. As part of its annual Renovate Norfolk (RVN) Program, the City uses federal funds to provide up to \$25,000 in rehabilitation assistance to income eligible homeowners with interior and exterior repairs.

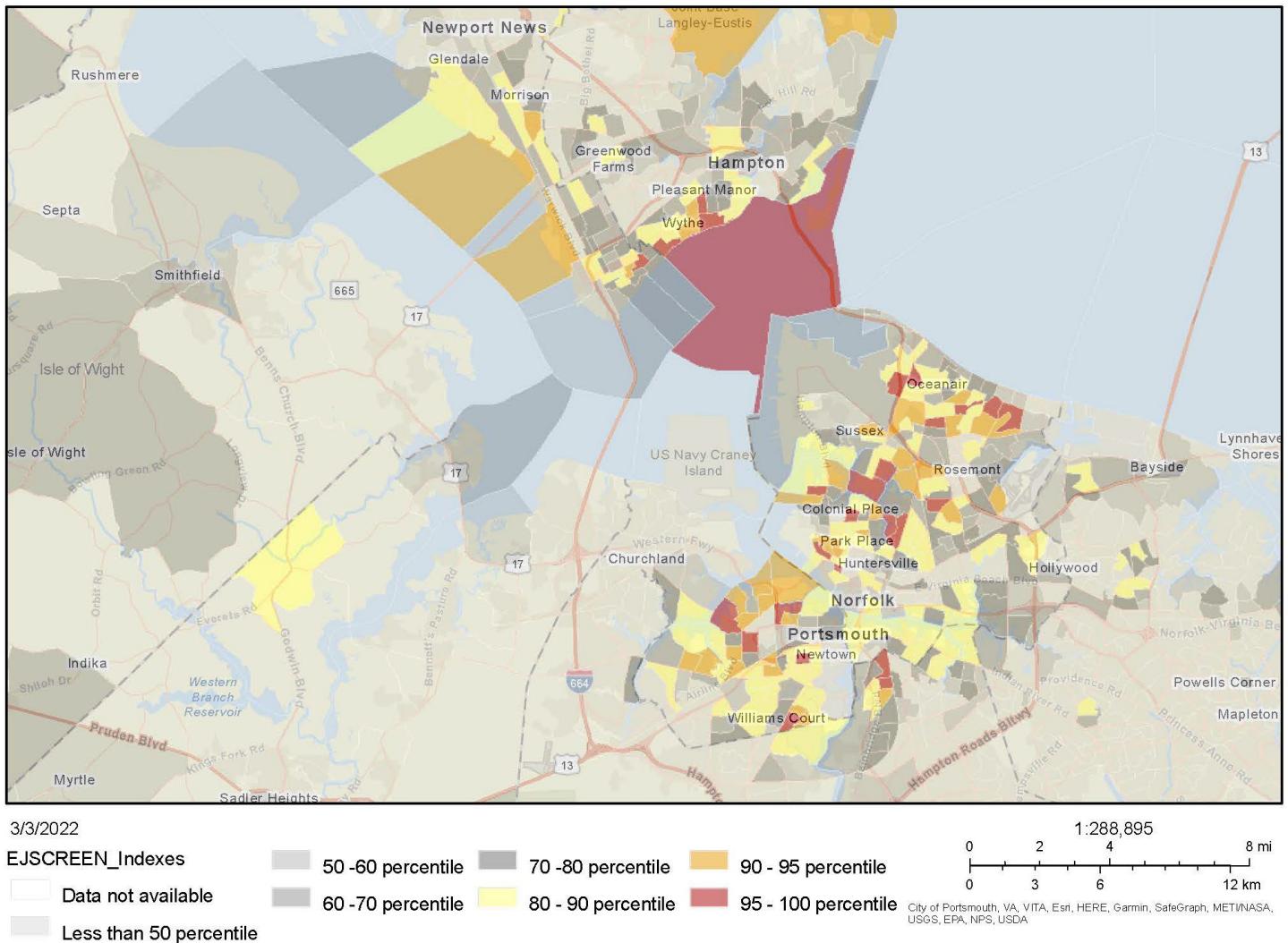
As part of the RVN Program, units constructed pre-1978 that receive less than or equal to \$25,000 per unit are required to:

1. Follow noticing guidelines by providing property owners/occupants with the Lead Hazard Information Pamphlet, the Notice of Lead Hazard Evaluation or Presumption, and the Notice of Lead Hazard Reduction Activities, if abatement activities were undertaken.
2. Conduct assessment or evaluation methods, such as paint testing of surfaces to be disturbed to determine the presence of lead-based paint.
3. Incorporate interim control measures to reduce temporary exposure or likely exposure to lead hazards.

Units constructed pre-1978 which may potentially receive more than \$25,000 are required to incorporate the above measures and perform abatement and clearance testing prior to the homeowner's re-occupancy. The City ensures the use of safe working practices by requiring all inspections to be conducted by lead-certified inspectors, and all repairs completed by contractors with the EPA Renovation, Repair and Painting (RRP) certification. Contractors are also encouraged to obtain the lead-abatement license issued by the VA Department of Professional and Occupational Regulation (DPOR).

Given the high concentration of older housing and the severe negative impacts to communities from lead poisoning, it is important that Norfolk continue to put resources towards remediating lead-based paint.

Figure 36: Lead Based Paint, Norfolk 2022



Source: Environmental Protection Agency, Environmental Justice Screening and Mapping Tool (Ver. 2.0)

IX. Homeownership and Lending Analysis

Key Data and Insights:

- White applicants accounted for 69% of all loan activity in 2020 yet White residents only represent 41% of the population of Norfolk. (B)
- Loan denial rates are significantly higher for communities of color, regardless of income. (C.ii)
- Discrepancies in the home lending market have not significantly improved for communities of color in Norfolk since the 2011 report data.

City of Norfolk Actions:

- Each year, the City of Norfolk provides approximately \$1 million to the Norfolk Redevelopment and Housing Authority's (NHRA's) HomeNet Homeownership Center to expand the supply of decent affordable housing to low-to-moderate income households who choose to purchase a home in Norfolk. The program provides up to \$40,000 in down payment and closing cost assistance to first-time homebuyers with household incomes at or below 80 percent AMI who are purchasing a home in Norfolk.

A. Introduction

A review of lending activities provides insight into potential patterns of discrimination and/or access to financing for protected classes. In accordance with the Home Mortgage Disclosure Act (HMDA), most lending institutions, including credit unions, must compile and disclose data about home purchase loans, home improvement loans, and home refinancing that they originate or purchase, or for which they receive applications. In particular, the purpose of Regulation C of the HMDA is to provide the public with data that can be used to:

- Help determine whether credit unions are serving the housing needs of their communities;
- Assist public officials in distributing public-sector investments to attract private investment to areas where it is needed; and
- Assist in identifying possible discriminatory lending patterns and enforcing compliance with anti-discrimination statutes.⁵⁴

The following sections provide an analysis of trends at the city, MSA, and state levels using the most recent previous three years of HMDA data available from the Federal Financial Institutions Examination Council (FFIEC), 2018-2020.

⁵⁴ National Credit Union Administration, <https://www.ncua.gov/regulation-supervision/manuals-guides/federal-consumer-financial-protection-guide/compliance-management/lending-regulations/home-mortgage-disclosure-act-regulation>

B. Loan Origination, Type and Purpose

Table 59 shows an increase in all loan purpose originations at three geographic scales between 2018 and 2020. Between 2018 and 2019, Virginia had the smallest increase at 27 percent but between 2019 and 2020 the commonwealth had the largest increase in originated loans. Meanwhile, Norfolk had the smallest increase compared to the MSA And commonwealth between 2019 and 2020.

Table 59: All Originated Mortgages by Area, 2018-2020

Area	Year	All Originated Mortgages	% Change from Previous Year
Norfolk	2020	9,312	62%
	2019	5,742	29%
	2018	4,459	
MSA	2020	95,973	70%
	2019	56,504	31%
	2018	43,097	
State	2020	469,508	75%
	2019	267,854	27%
	2018	211,473	

Source: Home Mortgage Disclosure Act; 2018, 2019 and 2020 Data

Historically, nonconventional loans (any loan other than a “conventional” loan) provide access to credit to those who may otherwise have limited access to mortgage credit. One advantage of nonconventional loans is the relatively low down-payment requirement of as little as 3.5 percent for FHA and VA lending programs, which serve the needs of borrowers who have few assets to meet down-payment and closing-cost requirements. FHA-insured and VA-guaranteed programs also provide credit access to borrowers who have low credit scores or high debt-to-income (DTI) ratios and cannot obtain conventional loans.⁵⁵

In 2020, 46 percent of all lending activity in Norfolk was from Veteran Affairs (VA) loans, which are a type of nonconventional loan that are guaranteed by the US Department of Veteran Affairs and available only to eligible current or former military personnel. Conventional loans were close behind in the number of overall loan types provided at 43 percent. Conventional loans are private loans that are not backed by a government entity. According to Consumer Finance Protection Bureau, conventional loans traditionally comprise most lending activity nationally.⁵⁶ One leading mortgage industry source placed the conventional loan market at 82

⁵⁵ Consumer Financial Protection Bureau, Data Point 2019: Mortgage Market Activity and Trends, A first Look at HMDA Data

⁵⁶ Consumer Financial Protection Bureau website, consumerfinance.gov/owner-a-home/loan-options

percent of all loan activity in November 2020.⁵⁷ The heavy military presence in Norfolk is likely a large contributing factor to the high rate of VA loans. A smaller percentage of conventional loans in Norfolk could also signal a greater population of residents that lack the necessary savings and income to qualify for conventional loans. The percentage of HUD-insured loans (FHA) in Norfolk are slightly better but consistent with the national FHA market share of 9.6 percent in FY 2020.⁵⁸

Table 60: Loan Types, All Purposes, Norfolk, 2020

Loan Type	# of Records	Dollar Amount (\$)	Percent of Total
Conventional	7,550	\$ 1,763,810,000	43%
FHA	1,793	\$ 347,905,000	10%
VA	8,089	\$ 2,104,635,000	46%
USDA	1	\$ 135,000	0%
Grand Total	17,433	\$ 4,216,485,000	100%
Source: Home Mortgage Disclosure Act 2020 Data			

The following three tables highlight a trend toward refinancing over home loan originations in Norfolk and elsewhere. Home loan originations in 2020 in Norfolk are split almost evenly between home purchases and refinancing with refinancing loan originations two percent higher. Refinancing loans are more prevalent in 2020 at the MSA and commonwealth scale at 54 and 60 percent respectively. Home improvement loans are three percent or below across all geographic areas.

Table 61: Number and Value of Loans Originated by Purpose, Norfolk, 2020

Home purchase			Home Improvement			Refinancing		
Number	Value \$000's	% of loans	Number	Value \$000's	% of loans	Number	Value \$000's	% of loans
4,030	\$1,101,240	48%	166	\$20,550	2%	4,157	\$1,072,315	50%
Source: Home Mortgage Disclosure Act 2020 Data								

⁵⁷ Press Release: "November Ellie Mae Origination Insight Report Data Shows Continued Refinance Demand as Interest Rates Fall; Refinances Surpass 60 Percent of Total Closed Loans", <https://www.iceright.com/about/news-reports/press-releases/november-ellie-mae-origination-insight-report-data-shows-continued-refinance-demand-as-interest-rates-fall-refinances-surpass-60-percent-of-total-closed-loans>

⁵⁸ Press Release: "FHA Publishes Annual Report to Congress on the Single-Family Mutual Mortgage Insurance Fund". HUD No. 20-194

Table 62: Number and Value of Loans Originated by Purpose, MSA, 2020

Home Purchase			Home Improvement			Refinancing		
Number	Value \$000s	% Of Loans	Number	Value \$000s	% Of Loans	Number	Value \$000s	% Of Loans
36,479	\$ 10,260,275	43%	1,956	\$184,750	2%	45,939	\$13,099,535	54%
Source: Home Mortgage Disclosure Act 2020 Data								

Table 63: Number and Value of Loans Originated by Purpose, Virginia, 2020

Home Purchase			Home Improvement			Refinancing		
Number	Value \$000s	% Of Loans	Number	Value \$000s	% Of Loans	Number	Value \$000s	% Of Loans
147,994	50,542,970	37%	12,301	1,478,585	3%	243,078	84,764,170	60%
Source: Home Mortgage Disclosure Act 2020 Data								

Given that 2020 represents the first calendar year of the COVID-19 pandemic, the higher rate of loans for refinancing is not surprising although the steep trend towards more refinancing loans originating since 2018, as shown in the table below, is important to note as it could indicate a softening real estate market that the pandemic accelerated. According to the Consumer Financial Protection Bureau's review of 2019 HMDA data, the increase in refinancing loans is likely due to low interest rates.⁵⁹ Regardless of the reason for higher occurrences of refinancing, the lending profile in Norfolk presents a picture of a market that is focused on existing homeowners staying in their current homes and less home sale transactions.

Table 64: All Originated Mortgages by Loan Type, Norfolk

2018	Originated	Percent Change from Previous Year
Home Purchase	3,009	n/a
Home Improvement	233	n/a
Refinancing	535	n/a
2019		
Home Purchase	3,449	-9%
Home Improvement	226	-2%
Refinancing	1,207	11%
2020		
Home Purchase	4,030	-22%
Home Improvement	166	-3%
Refinancing	4,157	25%
Source: Home Mortgage Disclosure Act 2020 Data		

⁵⁹ Mortgage Market Activity and Trends Consumer Financial Protection Bureau, https://files.consumerfinance.gov/f/documents/cfpb_2019-mortgage-market-activity-trends_report.pdf.

As shown in the following three tables, a closer look into home purchase loans in Norfolk, the MSA and the commonwealth reveals that conventional loans are lower in all three areas than the national average. Not surprisingly, VA loans have the highest rate of applications in Norfolk. On the other hand, the rate of FHA loan applications in Norfolk are lower than both other areas. Taken together, this data indicates that while the lending market in Norfolk shows a high level of nonconventional loan use, this is likely due to the high presence of eligible VA loan borrowers, due to the prominent military presence, rather than an indicator that lenders are investing in lower-income borrowers who are more likely to use nonconventional financing.

Table 65: Loan Type by Home Purchase Applications, Norfolk, 2020

Loan Type	# of Records	\$ Amount	% of Total Records
Conventional	2,599	\$ 702,085,000	39%
FHA	905	\$ 187,435,000	13%
VA	3,235	\$ 888,575,000	48%
USDA	1	\$ 135,000	0%
Total	6,740	\$ 1,778,230,000	100%

Table 66: Loan Type by Home Purchase Applications, MSA, 2020

Loan Type	# of Records	\$ Amount	% of Total Records
Conventional	25,905	\$ 6,901,775,000	43.13%
FHA	10,302	\$ 2,490,980,000	17.15%
VA	23,485	\$ 7,299,285,000	39.10%
USDA	372	\$ 78,830,000	0.62%
Total	60,064	\$ 16,770,870,000	100%

Table 67: Loan Type by Home Purchase Applications, VA, 2020

Loan Type	# of Records	\$ Amount	% of Total Records
Conventional	148,940	\$ 51,071,680,000	61.17%
FHA	38,207	\$ 10,129,155,000	15.69%
VA	48,803	\$ 18,971,245,000	20.04%
USDA	7,533	\$ 1,488,575,000	3.09%
Total	243,483	\$ 81,660,655,000	100%

As shown in Table 68, most loans originated in Norfolk were for single-family housing. This trend is consistent across the commonwealth and the MSA where loans for single-family housing account for 99 percent of all loans in all geographic areas. Only one out of eight applicants for manufactured housing were successful at originating a loan. Moreover, 13 percent of loans for multi-family properties were denied compared to 10 percent of the loans denied for single-family properties despite that loan applications for single-family properties accounted for a much higher share of total applications. Taken together, these trends in denials based on property type could indicate a bias against lending for property types that would support more affordable housing options entering the market.

Table 68: Loan Status by Property Type in Norfolk, 2020

Loan Status	Multi-family	Manufactured Single Family (1-4 units)	Site-Built Single Family (1-4 Units)	Total
Originated	67	1	9,244	9,312
Denied	12	6	1,771	1,789
Source: Home Mortgage Disclosure Act 2020 Data				

Table 69: Loan Status by Property Type in MSA, 2020

Loan Status	Multi-family: Manufactured	Multi-family: Site-Built	Single Family (1-4 Units): Manufactured	Single Family (1-4 Units): Site-Built	Total
Originated	1	174	368	95,430	95,973
Denied	1	25	467	16,405	16,898
Source: Home Mortgage Disclosure Act 2020 Data					

Table 70: Loan Status by Property Type in Commonwealth, 2020

Loan Type	Multi-family: Manufactured	Multi-family: Site-Built	Single Family (1-4 Units): Manufactured	Single Family (1-4 Units): Site-Built	Total
Originated	35	775	3,422	465,276	469,508
Denied	6	53	3,753	75,695	79,507

Source: Home Mortgage Disclosure Act 2020 Data

The HMDA data that is collected to relay information about applicants' race and ethnicity relies on self-reporting by the loan applicants. In the 2020 HMDA data, *lending activity* is recorded as one of eight categories:

- 1) Loan originated
- 2) Application approved but not accepted
- 3) Application denied
- 4) Application withdrawn by applicant
- 5) File closed for incompleteness
- 6) Purchases loan
- 7) Preapproval request denied
- 8) Preapproval request approved but not accepted

Based on the 2020 HMDA data, White applicants accounted for most of all lending activity with 7,659 records or just over 69 percent of all loan activity, while the same demographic accounted for 41 percent of the population of Norfolk in 2020. Applicants that did not report race had the highest average loan value with Joint applicants and White applicants average loan values being the next highest. Moreover, all minority applicants had a lower average loan value than White applicants, but Non-Hispanic Black or African Americans had a significantly lower average loan value at \$189,384 compared to \$239,122 for Non-Hispanic White applicants.

Table 71: Lending Activity by Borrower Race, Non-Hispanic or Latino, Norfolk, 2020

Race (not Hispanic or Latino)	# of Records	% of Total Records	Total Value	Avg. Loan Value
White	7,659	69.2%	\$1,831,435,000	\$239,122
Race Not Available	270	2.4%	\$65,740,000	\$243,481
Native Hawaiian or Other Pacific Islander	38	0.3%	\$9,190,000	\$241,842
Joint	196	1.8%	\$51,860,000	\$264,592
Black or African American	2,363	21.4%	\$447,515,000	\$189,384
Asian	439	4.0%	\$94,875,000	\$216,116
American Indian or Alaska Native	51	0.5%	\$10,635/000	\$208,529
2 or more minority races	50	0.5%	\$10,600,000	\$212,000
Source: Home Mortgage Disclosure Act Data, 2020				

Hispanic or Latino borrowers were also underrepresented in the home lending activity in the area in 2020. As the table below highlights, Hispanic or Latino applicants were under 5 percent of the lending activity, but the same demographic are 10 percent of Norfolk's population. Moreover, the average loan amount of \$208,517 for Hispanic or Latino borrowers was significantly lower than the average loan amount of \$227,886 for Non-Hispanic or Latino borrowers although not as low as the average loan difference between White and Black applicants.

Table 72: Lending Activity by Borrower Ethnicity, Norfolk, 2020

Ethnicity	# of Records	Percent of Loans	Total Amount	Ave. Loan Amount
Ethnicity Not Available	5,294	30.9%	\$1,461,140,000	\$275,999
Hispanic or Latino	799	4.7%	\$166,605,000	\$208,517
Not Hispanic or Latino	11,067	64.5%	\$2,522,015,000	\$227,886

In addition to challenges based on race and ethnicity in the local lending market, there is also a gender gap in lending activity. As the table below demonstrates, female borrowers represented approximately 20 percent of all lending activity in 2020. Male borrowers represented 37.3 percent of all lending activity during the same period. Moreover, the average loan amount by gender differed widely with the average loan amount for males at \$221,897 and females at \$196,106. It is worth noting that the HMDA dataset also provides data on Joint applications

with male and female co-applicants, which accounted for about 21 percent of the lending activity in the area and higher average loan amounts than either male or female only applicants at \$265,062.

Table 73: Lending Activity, Sex, Norfolk, 2020

Sex	# of Records	% of Lending Activity	\$ Amount	Avg. Loan Amount
Female	3,292	18.9%	\$645,580,000	\$196,106
Joint	3,735	21.4%	\$990,005,000	\$265,062
Male	6,504	37.3%	\$1,443,220,000	\$221,897
Sex Not Available	3,902	22.4%	\$1,137,680,000	\$ 291,563

Looking at the intersection of race and sex, both protected classes, White women represent most of the lending market. Approximately 52 percent of all female applicants were White, while Black or African American female applicants represented 28.6 percent of the lending activity. Though a variety of factors may be contributing to such distribution, the gap is worth noting as Norfolk continues to try and expand access to opportunity for all its residents.

Table 74: Lending Activity, Female Applicants by Race, Norfolk, 2020

Female Borrowers by Race	# of Records	% of All Records
2 or more minority races	57	0.8%
American Indian or Alaska Native	42	0.6%
Asian	315	4.6%
Black or African American	1,943	28.6%
Joint	14	0.2%
Native Hawaiian or Other Pacific Islander	21	0.3%
Race Not Available	858	12.6%
White	3,543	52.1%

C. Loan Denials

In addition to loan types and their purpose, a closer look at denial rates per loan type, loan purpose, and borrower demographics may help reveal potential disparities in the home lending market.

i. Loan Denials by Loan Type

Within loan types, Veteran Affairs (VA) loans have the lowest denial rates across all geographies that were analyzed. Norfolk's data reveals that VA loans are denied at a rate that is similar to the same loan type at the MSA and state scale but that Norfolk lenders deny conventional borrowers at a higher rate—3.6 percent and 1.6 percent than at the state and MSA scale respectively.

Table 75: Loan Application Denials, Loan Type, Norfolk, 2020

Area	Loan Type	# of Applications Denied	% of Denials within Loan Type	% of All Denials
Norfolk	Conventional	1,075	14.2%	60.1%
	FHA	790	9.5%	9.5%
	VA	4,390	6.7%	30.4%
MSA	Conventional	10,481	12.6%	62.0%
	FHA	1,641	8.4%	9.7%
	VA	4,752	6.9%	28.1%
Virginia	Conventional	59,895	10.6%	75.3%
	FHA	7,363	9.4%	9.3%
	VA	11,777	6.9%	14.8%

Though refinance loans had the highest denial rate among all loans, home improvement loans had the highest denial rate of non-other loans when examined by loan purpose at 46 percent. *Other* purpose loans, which are all loans with more underwriting hurdles and used for transactions other than home purchases, home improvement, refinancing or cash-out refinancing, had the highest denial rate within its own purpose category at 47.6 percent. It is worth noting that home purchase loans had a significantly lower rate of denial among each category of loans at 4.5 percent. A low denial rate within home purchase loans may point to a market in which self-selective mechanisms or formal review processes by financial institutions, such as pre-approvals, encourage qualified buyers to submit official loan applications.

Table 76: Loan Application Denials, Loan Purpose, Norfolk, 2020

Loan Purpose	# of Applications Denied	\$ Amount	% of Denials within Loan Purpose	% of All Denials
Home Purchase	300	\$ 65,620,000	4.5%	16.8%
Home Improvement	198	\$ 12,700,000	46.0%	11.1%
Other	186	\$ 15,340,000	47.6%	10.4%
Refinance	821	\$ 176,605,000	10.5%	45.9%
Cash Out	284	\$ 57,060,000	16.8%	15.9%

ii. Loan Denial Based on Race and Income

The data in the table below demonstrates that the loan denial rates for Blacks increased between 2008 and 2020. Furthermore, while the denial rate for both Black and White borrowers increased between the same time frame, a Black applicant's denial rate increased 0.2 percent more between 2008 and 2020 than the White applicant's denial rate.

Table 77: Comparison of Denials by Race in Norfolk

	2008	2020	Difference
Difference between White and Black Applicant Loan Denials	6.4%	6.6%	.2%
Black Denial Rate	12.9%	16.2%	3.3%
White Denial Rate	6.5%	9.6%	3.1%
Source: Hampton Roads Region of Virginia Analysis of Impediments to Fair Housing Choice, 2011 and Home Mortgage Disclosure Act 2020 Data			

As Table 78 shows, the rate of loan denials by race is consistent at all three geographic scales. White applicants show up with the lowest rate of loan denials in each geographic area at around 10 percent while all non-white applicants have higher rates of denial and American Indian applicants are subjected to the highest rate of denial among all non-White populations. Black applicants have a consistent denial rate of 16 to 17 percent across all three geographic scales.

Table 78: Race of Applicant by Loan Status in Norfolk, 2020

Loan Status	2 or more minority races		American Indian or Alaska Native		Asian		Black or African American		Native Hawaiian or Other Pacific Islander		White	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Originated	31	48%	44	56%	258	54%	1,450	57%	29	57%	5,570	65%
Application Approved, Not Accepted	4	6%	4	5%	14	3%	74	3%	2	4%	205	2%
Denied	13	20%	14	18%	77	16%	416	16%	8	16%	821	10%
Application Withdrawn	12	18%	9	11%	87	18%	429	17%	6	12%	1,296	15%
Incomplete	5	8%	8	10%	29	6%	163	6%	5	10%	413	5%
Loan purchased	n/a	0%	n/a	0%	13	3%	29	1%	1	2%	234	3%
Preapproval Denied	n/a	0%	n/a	0%	n/a	0%	n/a	0%	n/a	0%	2	0%
Source: Home Mortgage Disclosure Act 2020 Data												

Table 79: Race of Applicant by Loan Status in MSA, 2020

Loan Status	2 or more minority races		American Indian or Alaska Native		Asian		Black or African American		Native Hawaiian or Other Pacific Islander		White	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Originated	230	51%	356	54%	2,939	57%	13,981	58%	237	61%	59,528	67%
Application Approved, Not Accepted	14	3%	18	3%	122	2%	702	3%	11	3%	1,908	2%
Denied	90	20%	110	17%	705	14%	3,864	16%	50	13%	8,299	9%
Application Withdrawn	81	18%	113	17%	914	18%	3,788	16%	60	15%	12,555	14%
Incomplete	36	8%	56	8%	321	6%	1,488	6%	26	7%	4,146	5%
Loan Purchased	4	1%	8	1%	152	3%	342	1%	6	2%	2,724	3%
Preapproval Denied		0%		0%	1	0%	14	0%		0%	8	0%
Preapproval Not Accepted		0%		0%		0%		0%		0%	3	0%
Source: Home Mortgage Disclosure Act 2020 Data												

Table 80: Race of Applicant by Loan Status in Virginia, 2020

Loan Status	2 or more minority races		American Indian or Alaska Native		Asian		Black or African American		Native Hawaiian or Other Pacific Islander		White	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Origination	871	53%	1,271	53%	37,873	60%	41,002	57%	892	61%	290,571	66%
Application Approved, Not Accepted	32	2%	67	3%	1,504	2%	1,968	3%	37	3%	9,333	2%
Denied	318	19%	446	19%	6,912	11%	11,965	17%	204	14%	41,788	9%
Application Withdrawn	287	17%	362	15%	10,326	16%	11,230	16%	207	14%	60,362	14%
Incomplete	118	7%	186	8%	3,878	6%	4,786	7%	94	6%	19,833	4%
Loan Purchased	32	2%	55	2%	2,187	3%	1,445	2%	39	3%	18,992	4%
Preapproval Denied		0%		0%	13	0%	37	0%		0%	59	0%
Preapproval Not Accepted		0%	1	0%	9	0%	7	0%		0%	45	0%
Source: Home Mortgage Disclosure Act 2020 Data												

The following table and analysis explore denial rates based on race and income to provide insight into the financial and economic challenges that contribute to a lack of homeownership opportunities for borrowers of protected classes in the Norfolk area. To assess potential challenges, the analysis used derived variables provided by HMDA that combine borrower and co-borrower information for loan applications in 2020 which includes all loan types, all loan purposes, and all loan activity. Income data is measured through the Federal Financial Institutions Examination Council-calculated Median Family Income (MFI), which estimates median family incomes for metropolitan statistical areas, metropolitan divisions, and nonmetropolitan portions of each state, including the Norfolk MSA.

The table below highlights how non-White, low-income applicants are experiencing disproportionate levels of denial rates in comparison to White loan applicants. The table is sorted first by income bracket and then each income bracket is sorted smallest to largest by percent of denied loans compared to all lending activity within that income bracket. Note that in every income bracket but two, White applicants have a significantly lower denial rate than non-White borrowers. Note that in Table 81, the data indicates White applicants are not the smallest denial category in two income brackets, <30% and 81%-120% rather they share the same denial rate as a minority race, Black or African American and Native Hawaiian respectively.

Table 81: Loan Denials by Race, Income Bracket, Norfolk, 2020

Race	Income Bracket (% of FFIEC Median Family Income)	Total Loan Applications	# of Loans Denied	% of Loans Denied (smallest first)
Black or African American	30% and Below	6	0	0%
White	30% and Below	4	0	0%
White	31%-50%	472	46	10%
American Indian or Alaska Native	31%-50%	7	1	14%
Black or African American	31%-50%	343	70	20%
Joint	31%-50%	24	5	21%
Asian	31%-50%	37	9	24%
Native Hawaiian or Other Pacific Islander	31%-50%	5	2	40%
2 or more minority races	31%-50%	8	4	50%
White	51%-80%	2757	301	11%

Race	Income Bracket (% of FFIEC Median Family Income)	Total Loan Applications	# of Loans Denied	% of Loans Denied (smallest first)
Joint	51%-80%	86	10	12%
Native Hawaiian or Other Pacific Islander	51%-80%	22	3	14%
Black or African American	51%-80%	1315	212	16%
Asian	51%-80%	185	30	16%
2 or more minority races	51%-80%	36	6	17%
American Indian or Alaska Native	51%-80%	34	6	18%
Native Hawaiian or Other Pacific Islander	81%-120%	21	2	10%
White	81%-120%	3402	356	10%
2 or more minority races	81%-120%	21	3	14%
Black or African American	81%-120%	789	120	15%
Joint	81%-120%	95	15	16%
Asian	81%-120%	199	32	16%
American Indian or Alaska Native	81%-120%	34	6	18%
White	121% and above	1906	118	6%
Joint	121% and above	45	4	9%
Asian	121% and above	57	6	11%
Black or African American	121% and above	108	14	13%
American Indian or Alaska Native	121% and above	4	1	25%
Native Hawaiian or Other Pacific Islander	121% and above	3	1	33%

Race appears to be a significant factor in loan denial rates in Norfolk, adjusting for income. The data indicates that Black or African American, Asian, American Indian, and Native Hawaiian or Other Pacific Islander borrowers face the most challenges in the lending market. Though factors outside of explicit discrimination may be contributing to these discrepancies, such as general

access to capital, location of financial institutions, financial literacy, and the location or value of the asset being underwritten, lack of access to credit impacts communities of color in Norfolk and limits greater social and economic opportunity.

D. Discussion of Results

As data from this chapter reveals, discrepancies in the home lending market have not significantly improved for communities of color in Norfolk since the last Analysis of Impediments to Fair Housing Choice in 2011 (See Table 77). Furthermore, recent lending activity does not reflect the racial or ethnic composition of the area. Black or African American and Hispanic borrowers are underrepresented and White borrowers overrepresented in the local market. Moreover, denial rates disproportionately higher for communities of color, regardless of income. Female Black or African American applicants are experiencing hurdles in effectively securing a home loan in the area. Furthermore, when non-White borrowers are able to secure a loan, their average loan amounts are often lower than those from White borrowers. Such differences highlight the ongoing struggle for communities of color in securing adequate capital to access the home buying market in the area and ultimately build generational wealth. It is worth mentioning that the HMDA data provides limited insight into lenders' reasons for denial that can be analyzed by race and ethnicity. However, with the introduction of "not applicable" as an option for "denial reason," the data results are inconclusive. For example, almost 90 percent of all reasons for denial were categorized as "not applicable" and the majority of all denials by race are indicated in this category.

Looking forward, the City of Norfolk will continue to monitor these lending patterns to tailor local programs to meet the needs of all residents which will encourage greater financial security and homeownership opportunities in the city. Moreover, the City will be a strong advocacy partner with other entities to fight for fair lending practices and enforcement.

X. Review of Regulations and Policies

Key Data and Insights:

- The City is developing funding mechanisms to aid in home repair and blight remediation, including technical support, financial incentives, tax abatements for repair, and a rehabilitation program to assist qualified residents to repair heating, plumbing, and accessibility alterations. (E)
- The Commonwealth of Virginia adopted a law in 2020 to prohibit discrimination in housing based on source of income. The City of Norfolk codified this prohibition in early 2022.
- While there is an extensive public bus network in Norfolk, long headways of 30 minutes to an hour and limited nighttime service present challenges to people who rely on public transportation. (C.i)
- Through stakeholder interviews and reviewing the most recent data on building permits and housing stock, there appears to be a lack of housing diversity and decreasing middle housing (two-to-six-unit buildings) in Norfolk. Norfolk is still zoned primarily for single-family residential with most multi-family development relegated to arterial roads
- The City is working to address housing diversity with the adoption of the Missing Middle Pattern Book and encouraging the development of homes between two and six units to support affordability and accommodation of different family sizes.

A. Norfolk Planning and Zoning

i. Zoning and Site Selection

Norfolk's Comprehensive Plan, *plaNorfolk2030*, was adopted in 2013 and last revised in November 2021. The comprehensive plan imagines Norfolk as "a real city that is a great place to live, work and play," with strong and safe neighborhoods, a comprehensive transportation system, and a variety of well-maintained housing options. The plan was created after a review of more than 90 neighborhood area plans and studies, which had been undertaken since 1992, and a public process which included 6 open house meetings and an online forum. Norfolk's zoning ordinance "Building a Better Norfolk" is the other main planning document and was adopted on January 23, 2018, and last updated December 7, 2021. The zoning ordinance splits Norfolk into nine residential zoning districts and many special use and overlay districts. To understand how Norfolk planning and zoning affects fair housing in the city, the below is an assessment of the comprehensive plan, zoning ordinance, and the various small plans and projects housed under the City Planning department at large.

Other housing challenges that Norfolk recognizes in the Comprehensive Plan include having an older housing stock with 77 percent of housing stock at least 30 years of age. The plan specifically stipulates that disrepair and absentee landlords are widespread issues within

Norfolk. They posit that there are limited financial resources available to residents to maintain and repair their homes. At the same time, the City is developing funding mechanisms to aid in home repair and blight remediation, including technical support, tax and other financial incentives, tax abatements for repair, and Renovate Norfolk, a rehabilitation program to assist qualified residents to repair heating, plumbing, and accessibility alterations.

The next challenge the Plan recognizes is the lack of housing diversity. In the early twentieth century, Norfolk had an abundance of housing diversity, including the iconic “Norfolk six-pack”, a stacked six-unit, three-story small apartment building. Many of these housing types, however, were prohibited by zoning after World War II, when much of the United States focused on suburban and highway expansion. At this time, Norfolk began prohibiting multi-family housing types in many of its neighborhoods, concentrating density to redlined poor and majority Black neighborhoods. Single-family zoning, a zoning designation which allows only one house on one lot, emerged at this time, and many neighborhoods in Norfolk were zoned as such. When *plaNorfolk2030* was adopted in 2013, single-family housing was 79.2 percent of all Norfolk housing stock. This is a problem for a few reasons. First, single-family homes are generally more expensive than smaller, more dense styles of homes that can split construction and property costs amongst a few households. Second, single-family homes are more energy intensive, which could increase utility bills. Third, low density, single-use construction generally leads to a pattern of land development that dissuades walkability and public transportation, something that could make access to opportunities less viable and transportation more costly. Lastly, more housing diversity provides more choices to people to remain within their neighborhoods as they age and potentially downsize their home.

Some other housing challenges the comprehensive plan recognizes include concentrated poverty and an inadequate supply of housing for those with special needs. The Plan proposed supporting home modifications and rental and utility assistance to aid in developing more housing for those with mobility needs.

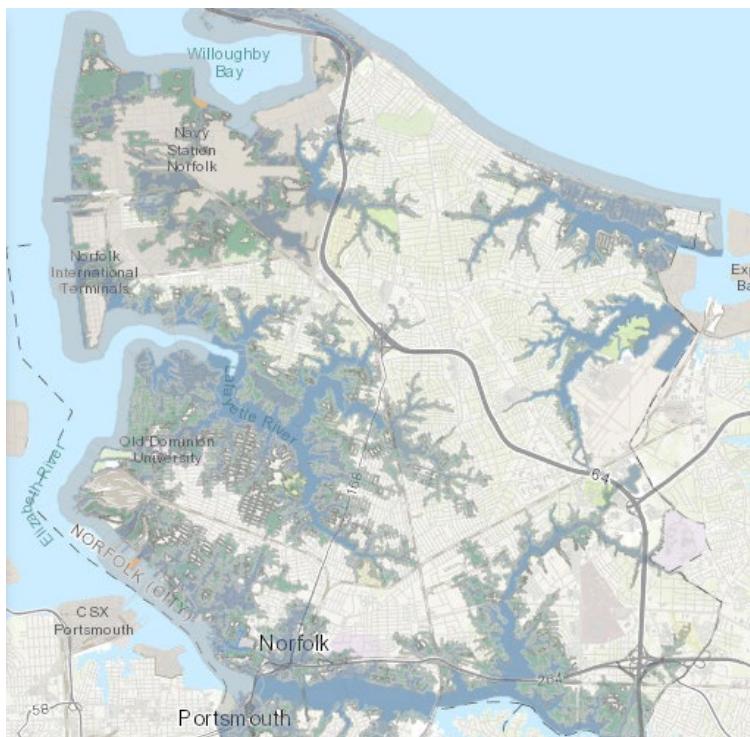
The last housing development challenge outlined in the Comprehensive Plan addresses the coastal nature of the city. To deal with the flooding challenges, the city created *Vision2100*, which separates the city geography into four areas differentiated by development potential. This long term strategy creates categories of “designing urban centers” – land at low risk of coastal flooding with potential for density, mixed use, and mixed-income development, “enhancing economic engines” – areas home to economic assets that are essential for the city’s future and require flood protection, “adapting to rising waters” – established neighborhoods that experience frequent flooding and need new and innovative flood mitigation technology, and “neighborhoods of the future,” which are established neighborhoods at less risk of coastal flooding, wherein the City should improve connections between these areas and key economic assets. There are also two resilience overlays in the zoning ordinance to deal with this challenge. The first, the Coastal Resilience Overlay is the most stringent overlay for the one-

percent annual chance flood zone, and stipulates that new development and redevelopment must:

- Be elevated three feet above base flood elevation;
- Have no basement;
- Ensure electrical systems are raised one foot above the finished floor elevation;
- Have maintained open space that landscapes with native, salt-tolerant plants; and
- Limit paved parking to reduce stormwater runoff.

The second, the Upland Resilience Overlay is for areas outside of the one-percent annual chance of flood zone and is meant to motivate development in parts of the city with less chance of flooding. This overlay encourages more walking, biking, parks, and transit-rich neighborhoods. Both overlay also offer developers points towards their Resilience Quotient⁶⁰ if they place a conservation easement on a high-risk property.

Figure 37: Norfolk Floodplain Map



Source: ArcGIS Norfolk Interactive Planning and Zoning Map

⁶⁰ The Resilience Quotient Standards were introduced as part of Norfolk's most recent zoning code update and applies to all proposed development and substantial renovations. The standards are intended to promote resilient development practices, including reducing flood risks and managing water, managing energy consumption, and supporting walkable neighborhoods. Other applicability requirements and exemptions as well as compliance details are available here: https://www.norfolkva.gov/norfolkzoningordinance/Content/Norfolk-ZO/5_12_Resilience_Quotient.htm

ii. Living Arrangements

Outside of the Comprehensive Plan, there are some other aspects of zoning code that should be carefully considered in relation to fair housing. There are stringent rules outlined in the zoning code about the amount of unrelated people that can live together. The code regulates the amount of people living together to either related people or no more than four people not related by blood, marriage, adoption, or legal guardianship. Any more people who choose to live together can only do so in a “group home” which requires eight or fewer aged, infirm, or individuals with disabilities residing in a dwelling with staff.

iii. Minimum Floor Space Requirements

There are several single-family zoning districts in Norfolk that vary by lot area, with minimum sizes ranging from 4,000 to 5,000 square feet (SF-T) to 20,000-25,000 square feet (SF-2). For the single-family districts, there are no minimum home sizes. For the multi-family zoning districts, each zoning districts has a minimum lot size, with the smallest being 8,000 square feet for MS-NF. Some zoning overlays such as APZ 1, APZ 2, and Clear Zone have a minimum of 2,900 square feet per dwelling unit. This minimum square foot per dwelling unit could be prohibitive to multi-family development.

iv. Manufactured Housing

Manufactured housing, which includes mobile homes, is generally considered an often-affordable housing type. Prior to 2018, the zoning ordinance included Manufactured Home Parks (MHP) as a zone category. The adopted 2018 zoning ordinance eliminated the MHP zoning district, rezoning those areas as multi-family, and now defines manufactured housing as a use that is allowed only as a temporary use in residential base zoning districts.⁶¹ This use is an allowance for temporary housing after a disaster. Under this designation, manufactured housing can be used for two years. At the same time, there is currently nonconforming permanent manufactured housing dispersed throughout the city. Because this housing is nonconforming, owners might face challenges completing major renovations or additions. Manufactured housing is an often naturally occurring affordable housing type and the prohibition of permanent construction means that all current manufactured housing is at risk of being replaced with less affordable housing. Similarly, no new manufactured housing can be constructed in the city outside of the confines of temporary disaster recovery.

v. Reasonable Accommodation

Currently, the City’s zoning ordinance lacks explicit reasonable accommodation language to account for requests from persons with disabilities in the jurisdiction seeking to amend or request an exception or adjustment to a zoning policy or ordinance. Under the Fair Housing Act,

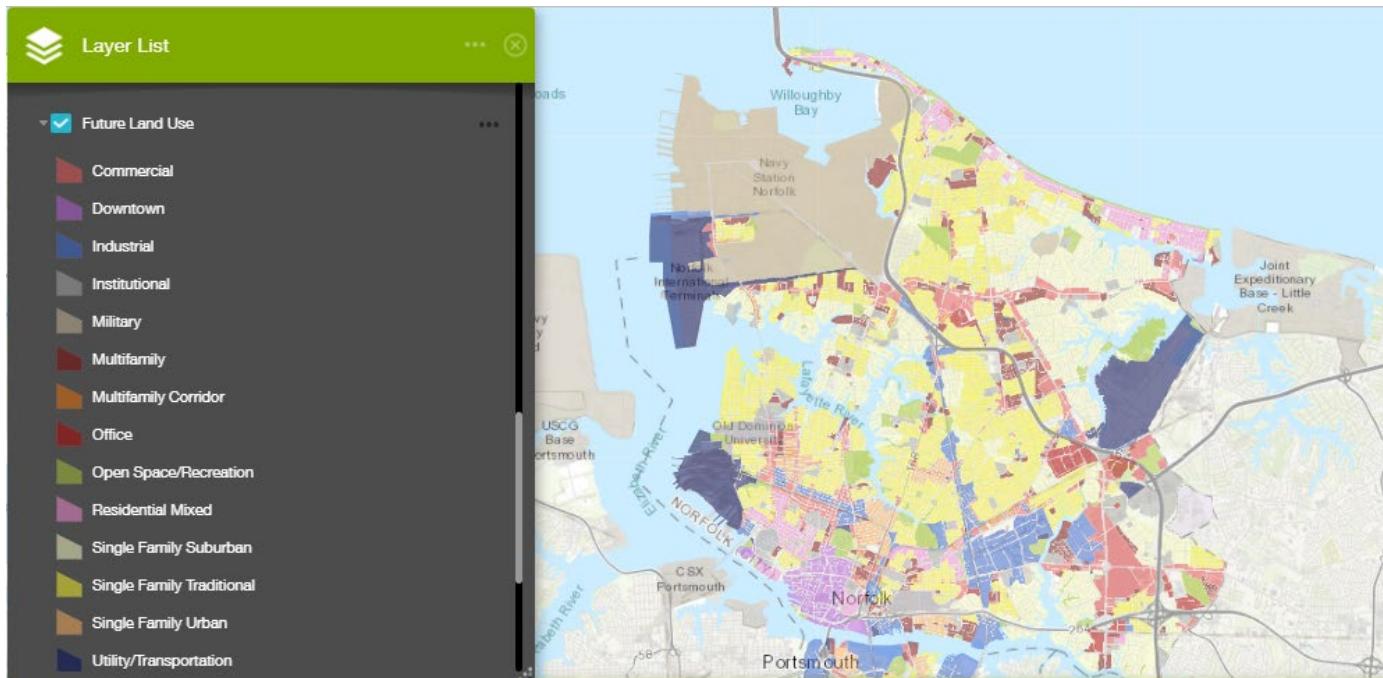
⁶¹ City of Norfolk Zoning Code, 2018, Table 3.2.12 (Residential Base Zoning Districts), <https://www.norfolk.gov/DocumentCenter/View/35581/Adopted-Zoning-Ordinance?bidId=>

it is unlawful to refuse to make “reasonable accommodations” to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. Without clear language or an explicit mechanism to handle such requests, the City may limit residents of protected classes in asserting their fair housing protections. The City may address this by examining its zoning ordinance and review the apparatus through which reasonable accommodation requests are handled.

vi. Multi-family and Accessory Dwelling Units

While Norfolk is predominantly zoned single family, the Comprehensive Plan indicated that between 1992 and 2011, there had been a shift away from single-family building in favor of multi-family permits. The future land use map below indicates that the City plans to continue concentrating multi-family development around the south and very north end of Norfolk.

Figure 38: Norfolk Future Land Use Map



Source: ArcGIS Norfolk Interactive Planning and Zoning Map

Another potential issue with the zoning code is that, while Norfolk is focusing on missing middle housing, anything more than a single-family dwelling including a duplex must be rezoned to R-C, or multi-family. There are currently five residential zoning categories that only allow single-family homes. At the same time, Norfolk has created City policy to expand missing middle housing and pursue model projects. One such policy is that accessory dwelling units, or small homes that are built on the same lot of a primary residence, are allowed by-right on all residential lots that zoned SF-6 or larger in the city. This expands options for affordable housing in the city. Other City projects include the Narrow Lot House Plans which, while still single-

family, allows for smaller homes with a collection of ready-made housing plans for homes of 25-30 feet of frontage to easily accommodate infill. The City has also developed the *Missing Middle Pattern Book*.⁶² The Pattern Book has free designs and renderings for dozens of middle housing types, including duplexes, quadplexes, and “Norfolk six-packs”. Norfolk six-packs are an iconic, historic housing type that stacked six units in three story homes. The pattern book provides an opportunity to streamline and expedite the development process through pre-approvals. Pages 79 through 81 of the pattern book stipulate where zoning permits missing middle, and where there are vacant lots to develop this housing. The available properly zoned land is a small area of the city concentrated around arterial roads, downtown and the northern coastal part of the city.

It is important to note that missing middle housing is also designated for multi-family zoning. The Comprehensive Plan stipulated that land use reclassifications should use the following criteria for multi-family housing:

- On sites within $\frac{1}{4}$ mile of an arterial road, an existing bus route, or transit supported area
- Adjacent to multi-family, multi-family corridor, mixed residential, downtown, industrial office, or commercial designation on the future land use map, and:
- The site itself had to accommodate open space, parking, buffering, and stormwater facilities, as required by the zoning ordinance.⁶³

The Comprehensive Plan also identifies criteria for multi-family corridor districts:

- The site is either located on an arterial or collector road or is within a Transit Supportive Area.
- The site is currently developed with multi-family housing or can serve as a buffer between less intense single-family neighborhoods and other more intense uses including multi-family, industrial, office, and commercial.
- The site can accommodate the open space, parking, buffering, and stormwater facilities as required by the zoning ordinance

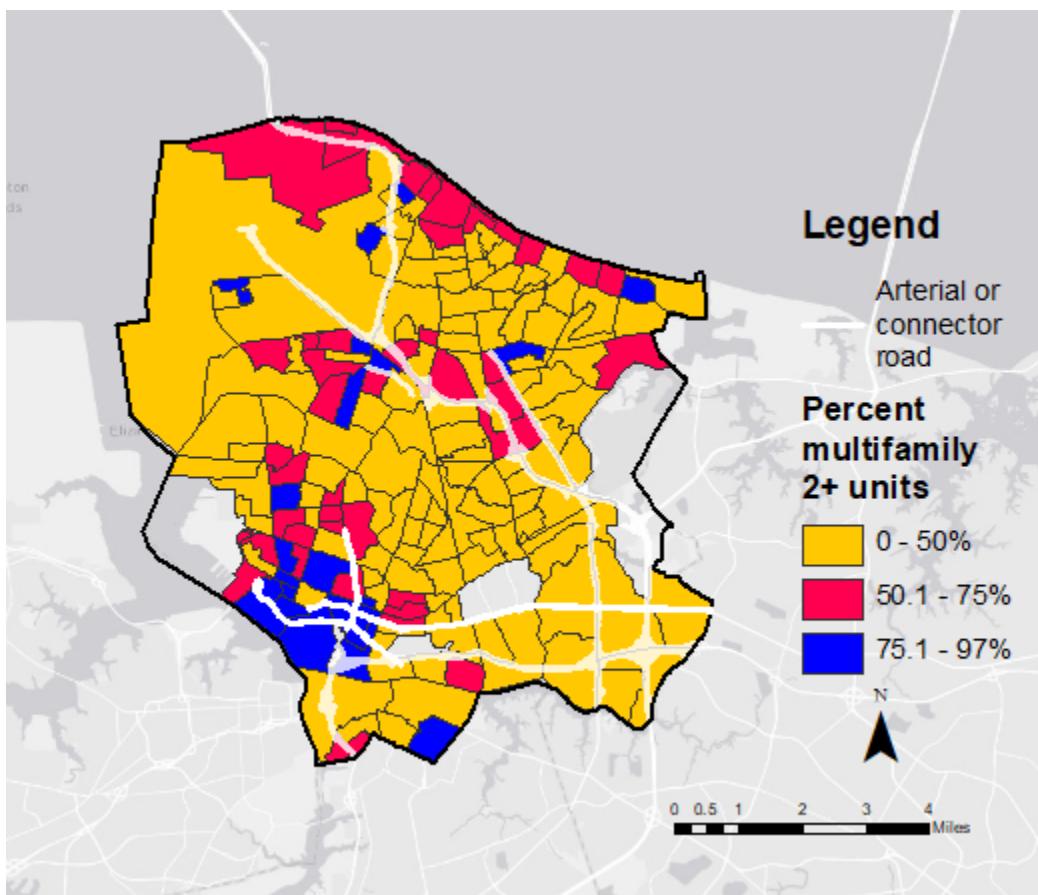
The stipulations in the Comprehensive Plan effectively solidify the current pattern of development for multi-family housing and serve to concentrate it in neighborhoods and along corridors where it already exists.

The map below shows the concentration of multi-family units compared to total units in census block groups in Norfolk. The map shows that the highest concentration of multi-family housing occurs downtown, along the northern coastline, and around arterial and collector roads.

⁶² Missing Middle Pattern Book, City of Norfolk, Adopted June 2021
<https://www.norfolk.gov/DocumentCenter/View/66555/MissingMiddlePatternBook>

⁶³ plaNorfolk 2030, Identifying Land Use Strategies 2-15, Multi-family,
<https://www.norfolk.gov/DocumentCenter/View/2483/plaNorfolk2030?bidId=>

Figure 39: Location of Multi-family in Norfolk 2019



Source: 2014-2019 ACS 5-Year

Because motor vehicles emit large quantities of carbon monoxide, particulate matter, hydrocarbons, and byproducts like lead and formaldehyde, centering apartments next to major sources of traffic can have adverse health outcomes including asthma and respiratory diseases, impaired lung function, and total and cardiovascular mortality and morbidity. For families with children, it is especially important to note the causal relationship between living next to traffic and childhood asthma rates.⁶⁴

⁶⁴ "Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects", https://www.healtheffects.org/system/files/SR17TrafficReview_Exec_Summary.pdf

B. Building Code (Accessibility)

The state of Virginia Uniform Statewide Building Code, Chapter 11 covers accessibility. The building code stipulates accessibility criteria for residential buildings that contain more than two units such as visible alarm notification appliances, accessible entrances for each dwelling, minimum calculations for accessible parking spaces, disabled parking signs, toilet and bathing room accessibility, elevators, water fountains, lifts, and service facilities. For most multi-family buildings, the required accessible units are shown below. There are some differences for specific building types such as adaptive reused buildings and live-work units.

Table 82: Virginia Building Code Accessible Dwelling Units and Sleeping Units

Number of Units	Minimum Required Number of Accessible Units without Roll-in Showers	Minimum Required Number of Accessible Units with Roll-in Showers	Total Number of Required Accessible Units
1 to 25	1	0	1
26 to 50	2	0	2
51 to 75	3	1	4
76 to 100	4	1	5
101 to 150	5	2	7
151 to 200	6	2	8
201 to 300	7	3	10
301 to 400	8	4	12
401 to 500	9	4	13
501 to 1,000	2% of total	1% of total	3% of total
Over 1,000	20, plus 1 for each 100, or fraction thereof, over 1,000	10 plus 1 for each 100, or fraction thereof, over 1,000	30 plus 2 for each 100, or fraction thereof, over 1,000

Source: Virginia Uniform Statewide Building Code

Critically, the accessibility portion of the building code does not apply to detached one- and two-family dwellings and their accessory structures in Virginia.⁶⁵

⁶⁵ Chapter 11: Accessibility Virginia Construction Code, <https://up.codes/viewer/virginia/va-construction-code-2018/chapter/11/accessibility#1109>

C. Social Services

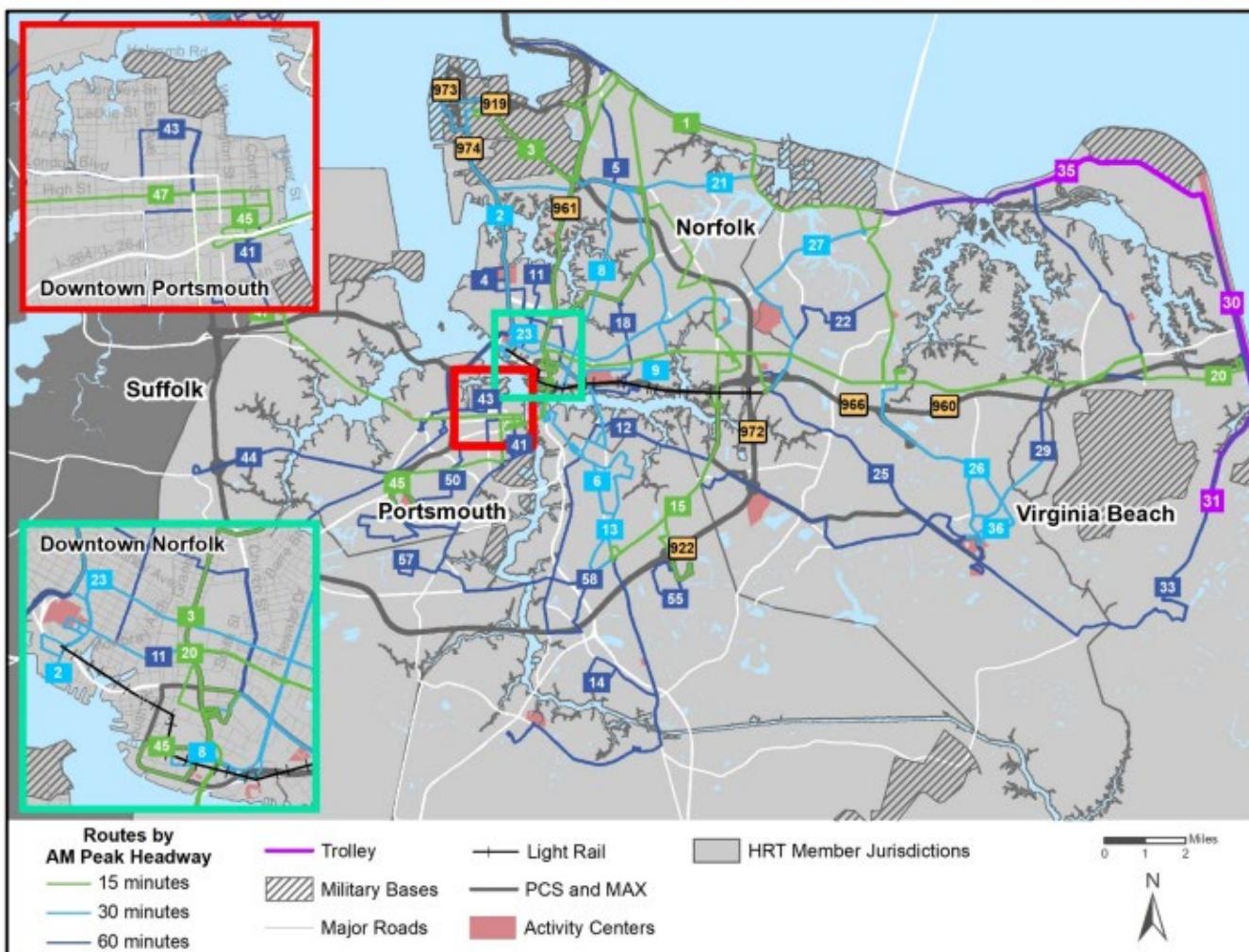
City of Norfolk service delivery impacts fair housing through municipal social services including public transportation, public works (water and sewerage), and social justice and inclusion. The information below includes these three services and their potential impact on fair housing.

i. Public Transportation

Public transit in Norfolk is run by Hampton Roads Transit (HRT). The regional system includes one light rail line through the south end of the city, ferry service, a bus network throughout the entire city, and paratransit services. As shown in the HRT service map below, the bus headways range from 15 minutes to an hour. Multiple interviewed stakeholders spoke to the challenges of public transportation. The most common concerns were that riders had to make multiple transfers to get to work and a trip a few miles could take a disproportionately long amount of time, the long bus headways (30 minutes and an hour) made it very difficult for riders to get to work and other obligations on time, and lastly interviewees expressed concerns about the hours of bus service. The 2020 Multimodal Norfolk Transit Concepts Report showed that only 22 percent of people living in poverty and 17 percent of people of color are within a fifteen-minute walk of a public transit stop⁶⁶. Additionally, none of the bus services run through the night and many begin service at 8:00 or 9:00 AM. One stakeholder said that these hours made it difficult for service workers to either run the opening or closing shift. Low ridership during the COVID-19 pandemic suspended two bus route lines, Route 919 and Route 921. Interviewed stakeholders also expressed concern about future service cuts.

⁶⁶ 2020 Multimodal Norfolk Transit Concepts Report,
<https://www.norfolk.gov/DocumentCenter/View/61333/Norfolk-Concepts-Report>

Figure 40: Norfolk Transit Map



Source: Hampton Roads Transit, Strategic Plan FY 21 – 30

ii. Public Works

Norfolk's Department of Public Works oversees the stormwater system, street network, and waste management and recycling system. The stormwater system is important to fair housing as much of Norfolk is at high risk of flooding, including many low-income areas where water damage, safety, and health concerns remain a concern. Survey results indicated that many residents thought there were drainage issues in their neighborhood.

For waste management and recycling, Norfolk operates a weekly trash pickup schedule. Recycling occurs every other week on the same day as trash collection. In response to questions about neighborhood improvements and concerns in the community survey, many residents indicated waste management concerns such as wanting cleaner streets, less litter, and easier ways to dispose of garbage. Some comments included, "trash everywhere," "There is

frequently garbage on the streets or sidewalks,” and they would like to see “less litter.” Other public works related concerns from the public survey responses included concerns about flooding, dim street lighting, lack of bike lanes, lack of sidewalks or sidewalks in disrepair, potholes and roads in need of repaving, lack of parks and public space, and speeding cars on residential streets. To deal with some of these concerns, the city created an online system for reporting and tracking pothole requests, as well as an online reporting system for streetlights that are broken. Additionally, a Parks & Recreation Litter Team was launched in fall 2021 as a trial program, removing 24 tons of litter citywide in two months. The City is seeking to make the program more permanent in 2022.⁶⁷

iii. Social Justice and Inclusion

Norfolk recently appointed the first Diversity, Equity and Inclusion Officer and LGBTQ Liaison to the City Manager’s Office and has expanded it with the FY 2023 budget to become an independent department with additional staff. At the same time, Norfolk created a Mayor’s Commission on Social Equity and Economic Opportunity. The committee created an Economic Opportunity Subcommittee Report which discusses the problem, historical causes, recommendations, partnerships, amplifying information, and measurements of success for a wide range of issues including minority business development, education, sports and wellness, physical health, community engagement, mental health, and affordable housing.⁶⁸

By addressing both the historic roots of inequity and advocating for more equitable community engagement, these initiatives help to further fair housing goals by improving access to opportunity and engagement for protected classes in the city.

D. Private Practices

i. Real Estate Practices

During stakeholder interviews, concerns were expressed about landlord discrimination in accepting Housing Choice Vouchers. One stakeholder argued that the rental market was so tight that implicit discrimination based on both source of income and amount of income represented a barrier to protected classes accessing rental housing.⁶⁹ The stakeholder mentioned that many high opportunity neighborhoods were not “voucher neighborhoods” due to this implicit discrimination.

⁶⁷ Parks P& Recreation Litter Team, City Manager Update January 28, 2022, <https://www.norfolk.gov/DocumentCenter/View/69557/CM-Update-Jan-28-2022-V1?bidId=>

⁶⁸ Mayor’s Commission on Social Equity & Economic Opportunity, Economic Opportunity Subcommittee Report, <https://www.norfolk.gov/DocumentCenter/View/69945/SEEO-Draft-Report-Update>

⁶⁹ The State of Virginia added source of income as a protected class against discrimination to its fair housing rules. The City of Norfolk adopted the policy as well.

ii. Advertising and Marketing

It is important to consider how housing is advertised to either prospective renters or homebuyers because it is often the first impression or interaction one has with a housing provider. By searching online for single-family and multi-family homes for rent or sale across Norfolk neighborhoods in March 2022, certain language and practices could serve to discourage some renters or buyers. At the end of March, there were 415 residential properties listed for sale on Zillow and 239 listed on Redfin. There were 201 rental listings on Zillow and 132 on Redfin. A variety of housing types and list prices were chosen to review language and practices directed at prospective tenants or homebuyers.

Income and Credit Score Minimums

Some listings are explicit in requiring a certain level of verifiable monthly income above the rental rate. One rental unit on Chesapeake Boulevard stated, “Prospective tenant must make at least 2.5 times the rent per month to qualify. Must provide income verification and provide previous landlord history (form provided) Military may submit LES.” The same listing also noted a required application fee and restrictions on dog breeds. These practices are not uncommon, with another listing for a single-family home for rent on Plymouth Street stating, “Household income must be 3x’s rent – No evictions – Credit score of 600+ - Clean Background Check – 3 references...No pets.” While rent payment histories are not considered in a credit score, many landlords in Norfolk are requiring high minimum scores to rent. These practices can create undue barriers for prospective renters—particularly those who are lower income.

Applications and Extra Fees

Like in the previous examples, many rentals require non-refundable lease applications. For a single-family home rental on Ransom Road, the listing indicates, “\$60 per adult applicant. One-time lease prep fee of \$150.00, deposit, and pet fee(s) required upon approval.” The same listing also indicates a “Tenant Benefit Package” for \$45 per month for two tenants, plus \$5 more for each additional tenant. There is little explanation of what these fees cover and there do not appear to be any caps on monthly fees on top of expected rent. One rental apartment on Westover Avenue demonstrates an onerous online- and mobile phone-based system to schedule a showing, stating in the listing, “PLEASE DO NOT TRY TO SET A LATER APPOINTMENT, IT WILL NOT WORK.” Moreover, detailed instructions about how to schedule an appointment to see the unit could at minimum be considered daunting to potential tenants. For example, one unit’s instructions required a response to the automatic appointment confirmation, to be sent “two hours prior to appointment, within five minutes of receipt or the appointment will be canceled.” Requiring reliable internet and phone service and response times as short as five minutes could serve as barriers to potential renters.

Cash Offers and Investor-focused Listings

Many listings across Norfolk declare that no repairs will be made and only cash (or equivalent) offers will be accepted. One single-family home for sale on Wall Street states, “Great rental, or tear down and build new! Property sold strictly AS IS. Cash, Hard Money, or Rehab loans only.” Other listings are focused solely on further raising property values and extracting profit. A single-family home for sale on Whitehead Avenue’s listing states,

“Renovate and rent or refurbish and sell. Get even more bang for your buck by purchasing the lot next door at XXX Whitehead Ave and build a new home for beaucoup profit. This is the time to make moves. With such low inventory, you can move quickly to whip this home back to life and get lots of return on your investment. Selling it AS-IS...”

This listing is also clear that no repairs will be made and also follows another trend in Norfolk sales listings by emphasizing a “low inventory.” The language of scarcity can drive up prices and drive away those unable to produce cash offers or act with extreme speed. Zillow has even created a special tag for “LOW INVENTORY” that is appended to listings like this one.

Omissions

Our research did not indicate any mention of potential flood or other climate risk (positive or negative) in any listings, except for those featured on redfin.com, which uses floodfactor.com and climatecheck.com data to categorize available properties. That said, the climate risk disclosures are placed far down the listing page and require an extra click to view. Zillow has a section of each listing called “Local legal protections” that outlines basic fair housing rights for anyone seeking to rent or buy a home in Norfolk. Redfin does not offer a similar outline.

E. Other Local Policies

In addition to public and private policies already discussed in this section, there are other local policies to consider in assessing potential barriers to fair housing in Norfolk.

i. Property Taxes

The Fair Housing Act prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes. In Norfolk the Real Estate Tax rates are set by City Council and as of July 1, 2019, the real estate tax rate was \$1.25 per \$100.00 for the assessed value and the business district tax rate was \$1.41 per \$100.00 of the assessed value. This rate is low nationwide but may still be a burden to protected class homeowners who are recently seeing property value increases. Real estate taxes are assessed by the City Assessor’s Office, the information and methodology are not made available to the public and any questions are redirected to the office phone number. There is a tax

relief/deferral program for Norfolk residents 65 years of age or older or permanently and totally disabled Norfolk residents.⁷⁰

ii. Title and Vacancy

The vacancy rate in Norfolk is 6.5 percent for rentals and 3 percent for homeowner occupied units which is a slight decrease from 2014 and less than the national vacancy rate of 9.7 percent in 2020.

In an effort to combat abandoned lots and property tax delinquency, the City has in the past employed programs with varying degrees of success. More recently the City has designed programs to accommodate the disposition of city owned properties to return residential vacant properties to productive use through transparent, accessible, equitable and more streamlined ways that build value into neighborhoods while supporting more options for affordable housing development and neighborhood strategic plans. The primary methods to be used to place vacant properties back into commerce will depend on if the property is buildable or non-buildable. Buildable properties may be available by or through a request for proposals (RFP) from developers. Both methods will include criteria for future use and reflect neighborhood specific goals. Non-buildable properties may be sold or granted as side/rear lots or as community amenities.

⁷⁰ City of Norfolk Real Estate Tax FAQs,
<https://www.norfolk.gov/faq.aspx?TID=48#:~:text=Effective%20July%201%2C%202019%20the,%24100.00%20of%20the%20assessed%20value.>

XI. Program and Portfolio Analysis

This chapter provides an overview of the participants, activities and allocations to each federally funded housing program within the City of Norfolk. Such a review helps to determine if available programs are adequately serving eligible persons. The data used to analyze the outcomes related to the federal programs comes primarily from the FY 2021/PY 2020 Consolidated Annual Performance and Evaluation Report (CAPER) which is prepared annually by City staff in accordance with requirements set forth by HUD.

Key Data and Insights:

- In FY 2021, the City of Norfolk received \$9,080,824 from HUD for housing and community development programs. (A)
- The City used CDBG funds to serve at least 129,029 people. (A.i)
- The City has implemented a variety of targeted programs to increase housing supply, diversity, and quality. (B)
- The consolidation of housing and community development into a single City department is a step forward in prioritizing fair and affordable housing in Norfolk.
- LIHTC properties are concentrated in R/ECAPs, including one ZIP Code in particular, indicating LIHTC developments are not necessarily serving to desegregate Norfolk neighborhoods. (D)

City of Norfolk Actions:

- Federal grants received to produce mixed income housing: The City and NRHA applied for and received a \$30M HUD Choice Neighborhood Initiative (CNI) grant to transform the Tidewater Gardens public housing community into a mixed-income, mixed-use neighborhood. The Choice Neighborhoods Initiative (CNI) was the U.S. Department of Housing and Urban Development's (HUD's) flagship redevelopment program and at the time its most significant neighborhood transformation initiative in decades. CNI supported local agencies to rebuild distressed public and assisted housing into mixed-income developments. Building on lessons from its predecessor initiative, HOPE VI, CNI mandated that affordable housing units be replaced 1:1 in any new project and that lease-compliant housing residents be able to return to new developments after they were completed. One of CNI's critical innovations was to extend efforts past the housing development and into the surrounding neighborhood, thereby supporting the vibrancy of the community as a place where a variety of people with different incomes would choose to live.
- The St. Paul's Area in Norfolk is home to the region's highest concentration of public housing with 1,674 aging units that do not meet modern building standards in three adjacent family public housing communities. This area is undergoing a resident-led neighborhood transformation, beginning with the Tidewater Gardens neighborhood

with support from a \$30 million HUD Choice Neighborhoods Initiative grant. The transformation will result in a mixed-use, mixed income neighborhood just east of Norfolk's downtown business district which will expand affordable housing and economic opportunities for residents.

- In FY 2019, with support from federal, local, and private resources, the City began the St. Paul's People First Initiative. People First seeks to address current family challenges, empower residents to lead healthy, prosperous lives, and build upon existing community strengths and assets. The program is providing effective and high-quality mobility services and human capital investment services to residents in Tidewater Gardens, phase 1 of the St. Paul's Area redevelopment. As the transformation progresses, People First will ultimately touch every one of the 1,700 families living in the St. Paul's Area. Urban Strategies, Inc. (USI), a non-profit organization, was selected by the City and NRHA through a competitive procurement process to implement the People First program. The Norfolk Plan to Reduce Poverty published in 2014 as well as the Norfolk Inclusive Economic Development Strategy developed in 2019 serve as guides for the goals and strategies for reducing poverty in Norfolk.
- In August 2020 the City of Norfolk released design principles for multifamily developments, to express the City's desire to facilitate high quality multifamily development that provides a mix of type and cost of housing accommodation. These principles will be used to evaluate multifamily housing in all neighborhoods and character districts. The goal of these principles for the physical design of multi-family housing is to re-establish the American Tradition of diverse neighborhoods and create a full range of housing opportunities for all. The guidelines suggest ways in which neighborhoods can be strengthened by the introduction of multi-family homes and new multifamily developments that are sufficiently diverse to become neighborhoods instead of projects.
- The Department of Economic Development runs a workforce development program called Norfolk Works. Norfolk Works is designed to align economic and workforce development efforts, champion the recruitment of diverse Norfolk talent to support business attraction, retention, and expansion, and collaborate with our workforce partners to help Norfolk citizens prepare for and connect to in-demand employment opportunities. Norfolk Works assists individuals with professional resume writing, job applications, and workforce training opportunities.
- The City of Norfolk is undertaking a transformational flood mitigation effort known as the Ohio Creek Watershed project. The Ohio Creek Watershed includes two residential, predominantly African American neighborhoods with civic leagues and a strong community identity: Historic Chesterfield Heights with over 400 houses on the Historic National Register; and Grandy Village, which includes a public housing community with more than 300 units. This approximately \$130 million project, supported with local

funding, CDBG, and CDBG-DR, will reduce flooding, improve public spaces and ensure the adjacent neighborhoods thrive for years to come.

- The City of Norfolk has recently been awarded approximately \$400 million in federal grants to support the Coastal Storm Risk Management project. The Norfolk Coastal Storm Risk Management Project was designed in partnership with the U.S. Army Corps of Engineers and establishes a system of surge barriers, tidal gates, floodwalls, levees, pump stations, and non-structural measures to reduce and manage flooding. This grant funding will form the first construction contract of a larger \$1.6 billion project to protect the city from flooding.

A. Federal Programs

In fiscal year (FY) 2021, the City of Norfolk received a total of \$9,080,824 from HUD for housing and community development programs. HUD's mission is to support the creation of strong, sustainable, inclusive communities and quality affordable homes for all. HUD allocated funds to Norfolk for the Community Development Block Grant (CDBG), the Emergency Solutions Grants Program (ESG), and the HOME Investment Partnerships Program (HOME). A breakdown of the allocation for each program and expenditures during the 2020 program year (PY 2020) is provided in Table 83. The amount allocated does not include prior year's unspent balances which is why the expended amount may be higher than the allocation amount, as is the case with CDBG funds. The "CARES ACT (CV) funds were provided to Norfolk via CDBG-CV and ESG-CV. The CARES Act provides federal grants to states, insular areas and local government to prevent, prepare for and respond to the spread of COVID-19. More details about how Norfolk utilized their CARES Act funding is provided in later sections.

Table 83: Norfolk, Virginia HUD Awards, FY 2021

Program	Allocation Amount	Amount Expended
CDBG	\$7,065,317	\$7,683,047
HOME	\$1,630,218	\$1,220,059
ESG	\$385,289	\$362,346
CARES Act (CV)	\$7,525,287*	\$1,821,132
Total:	\$9,080,824	

Source: Norfolk, FY 2021 CAPER
*CARES Act (CV) allocation amount is from FY 2020. Source: [hud.gov/program offices/comm_planning/budget/fy20](http://hud.gov/program_offices/comm_planning/budget/fy20)

In 2021 Norfolk completed their final Consolidated Annual Performance Evaluation Report (CAPER) of the 5-year Consolidated Plan cycle. The CAPER is used to report accomplishment and progress toward their Consolidated Plan goals. The FY 2021 CAPER covers the program year 2020 (PY 2020) from July 1, 2020, through June 30, 2021.

According to the FY2021 CAPER, the City was able to accomplish the following in PY 2020 using the HUD programs identified earlier.

- **Affordable Housing:** Education and counseling services provided to 217 extremely low-to moderate income participants and 35 non-low-moderate income participants. Seventeen households were provided down payment assistance and 33 families received Tenant-Based Rental Assistance.
- **Public Services:** The City reached 93 percent of its original annual goal to provide services to low-and moderate-income individuals through public service activities including local food bank support, dental health care and transitional housing. With the addition of CDBG-CV funds, the City was able to support an additional 27,999 low- and moderate-income individuals.
- **Homelessness:** Shelter provided to over 300 individuals, rapid rehousing services to 357 individuals, and prevention services to 45 individuals. A variety of social services were provided to 107 individuals by the Street Outreach team.
- **Economic Development:** Nine businesses were assisted, and six jobs were created.

Each program is discussed below in more detail.

i. CDBG

As an entitlement community, the City of Norfolk receives Community Development Block Grant (CDBG) funds annually from HUD. The CDBG program is authorized under Title I of the Housing and Community Development Act of 1974. Eligible grantees are:

- Principal cities of Metropolitan Statistical Areas (MSAs)
- Other metropolitan cities with populations of at least 50,000
- Qualified urban counties with populations of at least 200,000 (excluding the population of entitled cities)

Eligibility for participation as an entitlement community is based on population data provided by the US Census Bureau and the Office of Management and Budget (OMB). HUD determines the amount of each entitlement grantee's annual funding allocation by a statutory dual formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas.

HUD awards grants to entitlement community grantees on a formula basis to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services.

Projects funded by CDBG must meet one of three national objectives:

- Benefit low-and-moderate-income persons
- Aid in the prevention or elimination of slums and blight

- Meet an urgent need

While CDBG is a restricted funding source, it is commonly considered one of the most flexible funding sources from the federal government since the eligible activities typically align with what local jurisdictions need and want to do for their communities such as provide more housing, more economic development, more public facilities and more public services.

Based on the most recent published expenditure report available from HUD, PY2019, Norfolk used CDBG funds primarily to fund public facilities and improvements at 68.6 percent and Public Services at 12.6 percent. To a lesser extent, CDBG funds were also used for activities related to economic development (6.6 percent), housing (2.7 percent) and planning and administration (9.5 percent)⁷¹.

According to Norfolk's PY 2020 CAPER, the City used CDBG funds to serve at least 129,029 people across all racial and ethnic groups. The breakdown of races served is provided in Table 84.

Table 84: Races Served According to 2020 CAPER

Race	Total Served
White	34,636
Black or African American	72,333
Asian	2,684
American Indian or American Native	657
Native Hawaiian or Other Pacific Is.	209
Black/African American & White	958
Asian & White	1
Amer. Indian/Alaskan Native & Black/African Amer.	2
Other multi-racial	17,549
Total	129,029

Source: Norfolk, FY 2020 CAPER

ii. ESG

The Emergency Solutions Grant (ESG) program focuses on assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. Overall, the ESG program provides funding to:

1. Engage homeless individuals and families living on the street;
2. Improve the number of quality emergency shelters for homeless individuals and families;
3. Help operate these shelters;

⁷¹ HUD Exchange, IDIS CDBG Expenditure Report, PY2019 (7/1/19-6/30/20)

4. Provide essential services to shelter residents;
5. Rapidly re-house homeless individuals and families; and
6. Prevent families and individuals from becoming homeless.

To accomplish the above objectives, ESG funds may be used for 5 general program activities:

1. Street outreach;
2. Emergency shelter;
3. Homelessness prevention;
4. Rapid re-housing assistance; and
5. Homeless Management Information System (HMIS) - data collection

Since ESG is a formula grant program, eligible recipients of ESG funds include metropolitan cities, urban counties, territories, and states.

In the 2020 plan year, the City of Norfolk expended \$362,346 and utilized four subrecipients to administer ESG services. The subrecipients that worked with Norfolk included St. Columba Ecumenical Ministries, Inc., FORKIDS, Inc., YWCA of SHR, and The Salvation Army Hope Day Center. According to the City's FY 2021 CAPER, homeless services providers provided shelter to over 300 individuals, rapid rehousing services to 357 individuals, and prevention services to 45 individuals. The Street Outreach team provided services to 107 clients.

iii. HOME

HOME grants are allocated to states and units of general local government to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income households. Local jurisdictions may use HOME funds for a variety of housing activities, according to local housing needs including:

1. Tenant-based rental assistance;
2. Housing rehabilitation;
3. Assistance to homebuyers; and
4. New construction of housing

All housing developed with HOME funds must serve low- and very low-income households. For rental housing, at least 90 percent of the households benefited must have incomes at or below 60 percent of the area median income (AMI); the remaining 10 percent must have incomes at or below 80 percent of AMI. Each year, HUD publishes the applicable HOME income limits by area, adjusted for household size. For reference, in 2021 a Norfolk household with 4 members could qualify for a HOME assisted housing unit if the entire household made less than \$50,700 annually (60 percent of the Norfolk MSA AMI).

According to the narrative in the City's 2021 CAPER, the City subgrants nearly all their HOME funds allocation to the Norfolk Redevelopment and Housing Authority to administer the Homebuyer Assistance Program. In PY 2020, \$1,220,059 of the HOME funds were expended to

assist 50 households of which four identified as White, 45 identified as Black or African American and one identified as Other.⁷²

iv. Housing Opportunities for Persons with Aids (HOPWA) Program

HOPWA is a program managed by HUD's Office of HIV/AIDS Housing that provides housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families. The goals of the program are to increase housing stability, decrease the risk of homelessness, and increase access to care and medical support services.

Two types of grants are made under the HOPWA program. HOPWA formula grants are made using a formula to allocate approximately 90 percent of HOPWA funds to eligible cities on behalf of their metropolitan areas and to eligible States. HOPWA competitive funds are awarded on the basis of a national competition. The majority of HOPWA funding is provided through the formula program which is open to applicants of metropolitan statistical areas (MSA) with more than 500,000 people and at least 2,000 HIV/AIDS cases and States with more than 2,000 HIV/AIDS cases outside of eligible MSAs. Eligible residents of Norfolk access HOPWA funded services through the HUD approved, Virginia Beach Eligible Metropolitan Statistical Area (EMSA). Norfolk does not administer any HOPWA funding programs directly.

The City of Virginia Beach is the designated administrator of the region's HOPWA funds throughout the EMSA. According to Virginia Beach's FY 2020 CAPER published by HUD, the most recent CAPER available for Virginia Beach, they contracted with LGBT Life Center to manage the program for the region. Through this contract 849 households were served throughout the region by at least one of the programs offered.

Table 85: Number of Households Served by HOPWA Program, 2020

HOPWA Program	# of Households Served
Short-term rent, mortgage, and utility assistance to prevent homelessness	722
Tenant-based rental assistance	78
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	49

Source: Virginia Beach, 2020 CAPER

To be eligible for HOPWA services, individuals must be medically diagnosed with HIV/AIDS, considered low-income by HUD (80 percent or below of area median income), and homeless or at risk of becoming homeless.

⁷² City of Norfolk, FY 2021 CAPER

B. Local Initiatives

In addition to the federal programs outlined in the previous section, the City of Norfolk has undertaken a variety of local initiatives to help address housing access and fair housing issues since the last Analysis of Impediments in 2011.

i. Department of Housing and Community Development

In an effort to continue to prioritize affordable housing for the City of Norfolk, the City reorganized departments in 2021. An outgrowth of this re-organization is the new Office of Housing and Community Development with staff responsible for housing preservation, revitalization, and transformation. In 2021, the City, via this department, procured a consultant to conduct an updated Analysis of Impediments to Fair Housing—the first since 2011—to provide a framework that will address policies related to supporting more equitable and accessible housing for all residents of Norfolk. Through this new focus the City intends to include a higher proportion of funding toward affordable housing efforts than has been provided in the past.⁷³

The St. Paul's Area in Norfolk is home to the region's highest concentration of public housing with 1,674 aging units that do not meet modern building standards in three adjacent family public housing communities. This area is undergoing a resident-led neighborhood transformation, beginning with the Tidewater Gardens neighborhood with support from a \$30 million HUD Choice Neighborhoods Initiative grant. The transformation will result in a mixed-use, mixed income neighborhood just east of Norfolk's downtown business district which will expand affordable housing and economic opportunities for residents.

In FY 2019, with support from federal, local, and private resources, the City began the St. Paul's People First Initiative. People First seeks to address current family challenges, empower residents to lead healthy, prosperous lives, and build upon existing community strengths and assets. The program is providing effective and high-quality mobility services and human capital investment services to residents in Tidewater Gardens, phase one of the St. Paul's Area redevelopment. As the transformation progresses, People First will work with families from the other two communities as well. Urban Strategies, Inc. (USI), a non-profit organization, was selected by the City and NRHA through a competitive procurement process to implement the People First program. The Norfolk Plan to Reduce Poverty published in 2014 as well as the Norfolk Inclusive Economic Development Strategy developed in 2019 serve as guides for the goals and strategies for reducing poverty in Norfolk.

⁷³ City of Norfolk, FY 2021 CAPER

ii. Southeastern Virginia Homeless Coalition (SVHC)

The City is a member of the SVHC which is tasked with developing, sustaining, and coordinating comprehensive homeless services for the citizens of 6 jurisdictions. The SVHC has professional staff that conduct outreach to those experiencing homelessness to identify and assist those who are willing to access services across multiple sites in the city. In recent years the SVHC has implemented best practices that have contributed to a decrease in the number of people who become homeless and the length of time they experience homelessness.⁷⁴

iii. Missing Middle Pattern Book

In June 2021 the Norfolk City Council adopted a new development tool presented by the Department of Planning called the Missing Middle Pattern Book.⁷⁵ The book's presentation is similar to a manual and intended for developers. The book describes the benefits of, and how-to feasibly build, missing middle housing. Missing middle housing is defined as a range of multi-unit, clustered housing types that are compatible with single-family homes but also meet the growing demand for affordable housing choices in a walkable, urban living environment. The manual outlines where missing middle housing is already allowed by-right and provides dozens of designs and schematics at no cost.

iv. Accessory Dwelling Units by Right

To encourage increased density in low-risk flood areas, in early 2018 the Norfolk City Council voted unanimously to adopt a new zoning ordinance that among other updates significantly expanded the use of accessory dwelling units (ADUs) in Norfolk by allowing them by right in designated areas and by Conditional Use Permit in other areas. Many planning officials agree that ADUs can provide a source of affordable housing for renters and a source of income for homeowners.

v. Inclusionary Housing Policy

In September 2019, a citizen advisory committee, coordinated by the St. Paul's Area Transformation project, convened to review affordable housing needs in Norfolk and explored best practices in inclusionary housing policies. Inclusionary housing policies are those which promote viable, market-based strategies for increasing affordable housing and creating mixed-income communities.⁷⁶ The committee presented their recommendations to Norfolk City Council, including that the sale of City-owned parcels for multi-family and mixed-use development should require 10 percent or more of the units be affordable to voucher holders. This has been integrated into planning policies, including the City's Multifamily Design

⁷⁴ City of Norfolk, FY 2021 CAPER

⁷⁵ "Missing Middle Pattern Book" City of Norfolk,

<https://www.norfolk.gov/DocumentCenter/View/66555/MissingMiddlePatternBook>

⁷⁶ HUD Office of Policy Development and Research "Inclusionary Zoning and Mixed-Income Communities",

<https://www.huduser.gov/portal/periodicals/em/spring13/highlight3.html>

Guidelines.⁷⁷ So far, eight projects have been built with inclusionary zoning units, totaling 119 units. The City will continue to advocate for the expansion of this policy in other planning and zoning efforts.

vi. Olde Huntersville Homes Program

In 2017, the City developed a community led initiative to help incentivize new home construction on vacant lots in the historic Olde Huntersville neighborhood. It was the first initiative of its kind by the City that gives residents tools to make building affordable and well-designed on available lots without going through rigorous and time-consuming permitting processes. The Plan Book is free and can be used by anyone interested in building a home in the Olde Huntersville neighborhood.

vii. Resilience Program

As recently described by one of the City's prominent stakeholders in his 2018 online blog article for the American Planning Association, George Homewood, the Hampton Roads region is the nation's second most-threatened area from sea-level rise, behind Miami.⁷⁸ Due in part to its high vulnerability to climate change, in 2013 Norfolk was selected to participate in the Rockefeller Foundation's inaugural launch of 100 Resilient Cities (100 RC). As one of the selected 100 cities, Rockefeller provided each participant resources in the form of seed funding to pay for a Chief Resilience Officer, technical assistance and research to assist in developing a pilot program that would ideally grow into a sustainable central office to address climate change and other factors that impact a city's ability to be resilient.

Norfolk's Office of Resilience was created in 2015 as an outgrowth of the 100 RC designation and is responsible for carrying out the Norfolk Resilience Strategy, a formal commitment by the City that outlines how they will face and respond to current and future challenges. The strategy identifies three main goals, one of which is specifically relevant to addressing fair housing opportunities: Advance initiatives to connect communities, deconcentrate poverty, and strengthen neighborhoods.⁷⁹

In 2016, Norfolk was awarded \$113,138,020 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funding from the VA Office of Housing and Community Development to implement the Ohio Creek Watershed Improvement project, an infrastructure project that improves flooding challenges in two predominately African American residential neighborhoods, Grandy Heights with more than 300 public housing units and historic

⁷⁷ Multifamily Design Guidelines: <https://www.norfolk.gov/DocumentCenter/View/63214/Design-Principles-for-Multifamily-Development?bidId=>

⁷⁸ "Meeting the Housing Challenge in Norfolk as Sea Levels Rise" Planning.org, <https://www.planning.org/blog/blogpost/9155749/>

⁷⁹ Norfolk Resilient Strategy, <https://www.norfolk.gov/DocumentCenter/View/27257/Norfolk-Resilience-Strategy-?bidId=>

Chesterfield Heights with more than 400 units. According to the Norfolk Office of Resilience, the Ohio Creek project will be completed in less than a year.

Another major project that impacts housing in Norfolk and is being managed by the Office of Resilience is the U.S. Army Corps of Engineers Coastal Storm Risk Management Project. This project recently received a commitment of partial funding from the U.S. Infrastructure Investment and Jobs Act to build a structural barrier around a portion of the city that will provide storm surge protection to the majority of downtown Norfolk and the Tidewater Gardens neighborhood, which is currently under redevelopment due to a Choice Neighborhood Initiative grant issued to Norfolk to upgrade older neighborhoods with a high concentration of public housing. In March 2022, the U.S. Army Corps of Engineers announced an additional \$150 million to support the Coastal Storm Risk Management project, bringing the total funding from federal partners to nearly \$400 million.⁸⁰

As federal funding specifically for housing and community development continues to be a shrinking portion of local government's budgets, it is important that Norfolk continues to leverage all funding sources that support stronger, more resilient neighborhoods, like they are doing with the resilience funds from HUD and other federal agencies to protect neighborhood and improve the housing stock.

viii. Workforce Development Programs

In partnership with the Norfolk Redevelopment and Housing Authority, the City supports the following efforts to support public housing residents with workforce development:

- Jobs Plus – A HUD-funded pilot program that began in 2018, focused on developing a locally-based approach to increase earnings and advance employment outcomes for public housing residents in the Young Terrace community. The program expired in 2021 and in its final year of operations served a total of 352 program participants of whom 331 gained employment.
- Out of School Youth Program – Provides support to youth who want to learn relevant workplace readiness skills, pursue secondary education or vocational skills training, complete GED competencies and enter the workplace at a livable wage. Eligible participants are between the age of 18-24 years old and a member of a NRHA subsidized household.
- NRHA job fairs – Events that attract partnering businesses with job openings.
- St. Paul's People First Initiative – People First seeks to address current family challenges, empower residents to lead healthy, prosperous lives, and build upon existing community strengths and assets. The program is providing effective and high-quality mobility services and human capital investment services to residents in

⁸⁰ Norfolk to Receive Additional Federal Funding to Increase Community Resilience to Funding, <https://www.norfolk.gov/CivicAlerts.aspx?AID=6011>

Tidewater Gardens, phase 1 of the St. Paul's Area redevelopment. As the transformation progresses, People First will ultimately touch every one of the 1,700 families living in the St. Paul's Area. Urban Strategies, Inc. (USI), a non-profit organization, was selected by the City and NRHA through a competitive procurement process to implement the People First program. The Norfolk Plan to Reduce Poverty published in 2014 as well as the Norfolk Inclusive Economic Development Strategy developed in 2019 serve as guides for the goals and strategies for reducing poverty in Norfolk.

C. Publicly Supported Housing

The Norfolk Housing and Redevelopment Authority (NHRA) is the public housing authority (PHA) responsible for the low-income public housing and housing choice voucher (HCV) programs for residents of Norfolk. The NHRA also administers the Project-Based Voucher (PBV), Rental Assistance Demonstration (RAD) and the Tenant Protection Voucher (TPB) programs. As stated in the NHRAs 2023 five-year plan, the Authority's mission is to provide quality housing opportunities that foster sustainable mixed-income communities.

The NHRA also administers homebuyer programs funded with federal HOME grants and local City funds that provide down-payment assistance to first-time homebuyers with household incomes at or below 120 percent of area median income.

Publicly supported housing includes any housing that is supported using public money such as Housing Choice Vouchers (HCV) (formerly Section 8), Mainstream Vouchers, HOPE VI and other housing supported with public funding.⁸¹

- Public housing includes affordable apartments for low-income families, the elderly, and persons with disabilities.
- Project-Based Section 8 housing provides rental housing to low-income households in privately owned and managed rental units. However, the subsidy stays with the building; when a tenant moves out, they no longer have the rental assistance.
- Other Multi-family housing includes a suite of housing programs, including those that serve persons with special needs, such as Section 202-Supportive Housing for the Elderly and Section 811-Supportive Housing for Persons with Disabilities.
- Housing Choice Vouchers (HCV) allow participants to find housing of their choice and a housing subsidy is paid to the landlord directly by the Public Housing Agency on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.

⁸¹ "Public Housing" US Department of Housing and Urban Development, https://www.hud.gov/program_offices/public_indian_housing/programs/ph

Table 86 illustrates the number and type of public housing units in Norfolk.⁸² In 2020, Norfolk had 95,018 housing units, of which 9,213 or 9.7 percent were publicly assisted, as seen in the table below. The majority of housing assistance was through the HCV program, where approximately 4,611 or 4.85 percent of Norfolk's housing units received assistance, closely followed by public housing, where approximately 2,760 or 2.9 percent of housing units received assistance. Project-Based Section 8 and other multi-family housing assistance had the least participants, with Project-Based Section 8 at 1,662 housing units and other multi-family at 180 housing units.

Table 86: Publicly Supported Housing Units by Program Category, Norfolk, 2020

Housing Units	Number	Percent
Total housing units	95,018	-
Public Housing	2,760	2.90%
Project-based Section 8	1,662	1.75%
Other Multi-family	180	0.19%
HCV Program	4,611	4.85%

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, version AFFHT0006 2020 data update (analysis years vary), more information available at: <https://egis.hud.gov/affht/>

The following table examines the demographics of those who participate in publicly assisted housing programs. In Norfolk, Black or African American people disproportionately participate in federal housing assistance programs, representing 95.7 percent of public housing households and 92.1 percent of HCV Program recipients. For all programs, Black or African American people make up 90.5 percent of participants. However, Black or African American people comprise 41.1 percent of Norfolk's population. Hispanic or Latino households represent 1.8 percent, and Asian or Pacific Islanders represent just 0.4 percent of publicly assisted households.

It should be noted that Black or African American people represent 95.7 percent participants in public housing but only 77.4 percent in Project-Based Section 8 which may indicate some barriers for equitable access to Project-Based Section 8. Additionally, these demographics are important as any policy that effects publicly supported housing may have a disparate impact on race given the uneven participation rates by race.

⁸² Note Affirmatively Furthering Fair Housing data uses 2020 DEC for housing units rather than 2019 ACS.

Table 87: Publicly Supported Housing by Race, Norfolk, 2020

Housing Type	White		Black		Hispanic		Asian or Pacific Islander	
Public Housing	56	2.2%	2,468	95.7%	39	1.5%	7	0.3%
Project-Based Section 8	306	20.0%	1,184	77.4%	31	2.0%	8	0.5%
Other Multi-family	17	10.4%	137	84.1%	5	3.1%	3	1.8%
HCV Program	189	5.5%	3,189	92.1%	64	1.9%	11	0.3%

Source: AFFH Raw Data Version AFFHT0004a February 2022

D. Low-Income Housing Tax Credit (LIHTC)

The LIHTC program was created by the Tax Reform Act of 1986 and gives state and local LIHTC-allocating agencies the equivalent of nearly \$8 billion annually to invest in tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The program is administered at the federal level entirely by the IRS and states administer the program to local jurisdictions. At inception the LIHTC program required a 15-year compliance period, the period that units must remain affordable to low-income households. Beginning in 1990, new LIHTC properties are now required to “extend” the compliance period another 15 years for a total of 30 years. While in most cases, there is little incentive and few effective enforcement mechanisms in place to require LIHTC projects to remain affordable after the first 15 years from when they are initially placed in service, interviews indicate that Virginia Housing has maintained effective project enforcement.⁸³

Since 1988 until 2019, the most recent year that data is available, 39 LIHTC projects have been developed in Norfolk that altogether created 4,324 rental units over the same time period, 3,924 of which were made available only to low-income households for a period of time after development is completed, usually 15 years as described above. By 2021, the initial compliance period for 1,865 of the low-income restricted units passed. If all applicable project owners had an extended compliance period for another 15 years, then potentially 1,695 of these units remain affordable for a few years longer. If all the project owners pursue the full 30-year compliance period, the longer compliance period has already, or will expire, for 252 affordable units by 2024.

⁸³ “What Happens to LIHTC Properties After Affordability Requirements Expire?” PD&R Edge, https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html

Table 88: LIHTC Properties by ZIP Code, Size and Compliance Period, Norfolk, 1988-2019

Placed	ZIP	Total	LMI	0 BR	1 BR	2 BR	3 BR	4 BR	15 Yr.	30 Yr.
1988	23504	2	2						2003	n/a
1988	23523	1	1						2003	n/a
1990	23504	4	4						2005	2020
1990	23523	6	6	0	6	0	0	0	2005	2020
1991	23504	4	4						2006	2021
1991	23509	156	153						2006	2021
1994	23505	212	85						2009	2024
1996	23505	100	100	0	48	52	0	0	2011	2026
1998	23505	308	308	0	40	268	0	0	2013	2028
1999	23503	434	434	0	0	240	194	0	2014	2029
2000	23505	220	110	0	56	164	0	0	2015	2030
2001	23513	64	64	0	0	48	16	0	2016	2031
2002	23502	132	132	0	75	57	0	0	2017	2032
2003	23504	81	81	0	0	81	0	0	2018	2033
2004	23504	100	100	0	88	12	0	0	2019	2034
2005	23504	67	56						2020	2035
2005	23504	43	34	0	8	18	12	5	2020	2035
2006	23504	58	58	0	10	25	19	4	2021	2036
2006	23504	50	50	0	10	19	21	0	2021	2036
2006	23504	45	45	0	8	18	17	2	2021	2036
2006	23504	38	38	0	0	24	14	0	2021	2036
2007	23517	60	60	60	0	0	0	0	2022	2037
2009	23504	40	40						2024	2039
2009	23504	180	180						2024	2039
2009	23505	120	120						2024	2039
2011	23504	260	130						2026	2041
2011	23504	275	271						2026	2041
2015	23502	180	180	0	30	114	0	0	2030	2045
2015	23502	120	120	0	18	72	0	0	2030	2045
2015	23505	205	205	0	183	22	0	0	2030	2045
2016	23505	47	47			43	4		2031	2046
2017	23523	84	84	0	12	54	18	0	2032	2047
2017	23523	68	68	0	12	40	16	0	2032	2047
2017	23523	128	128			58	70		2032	2047
2018	23504	50	50		10	19	16	5	2033	2048
2018	23504	80	80	80					2033	2048
2018	23523	126	126		32	38	38	18	2033	2048
2018	23523	50	50			39	11		2033	2048
2019	23510	126	120		20	80	26		2034	2049
Total		4,324	3,924	140	666	1,605	492	34		

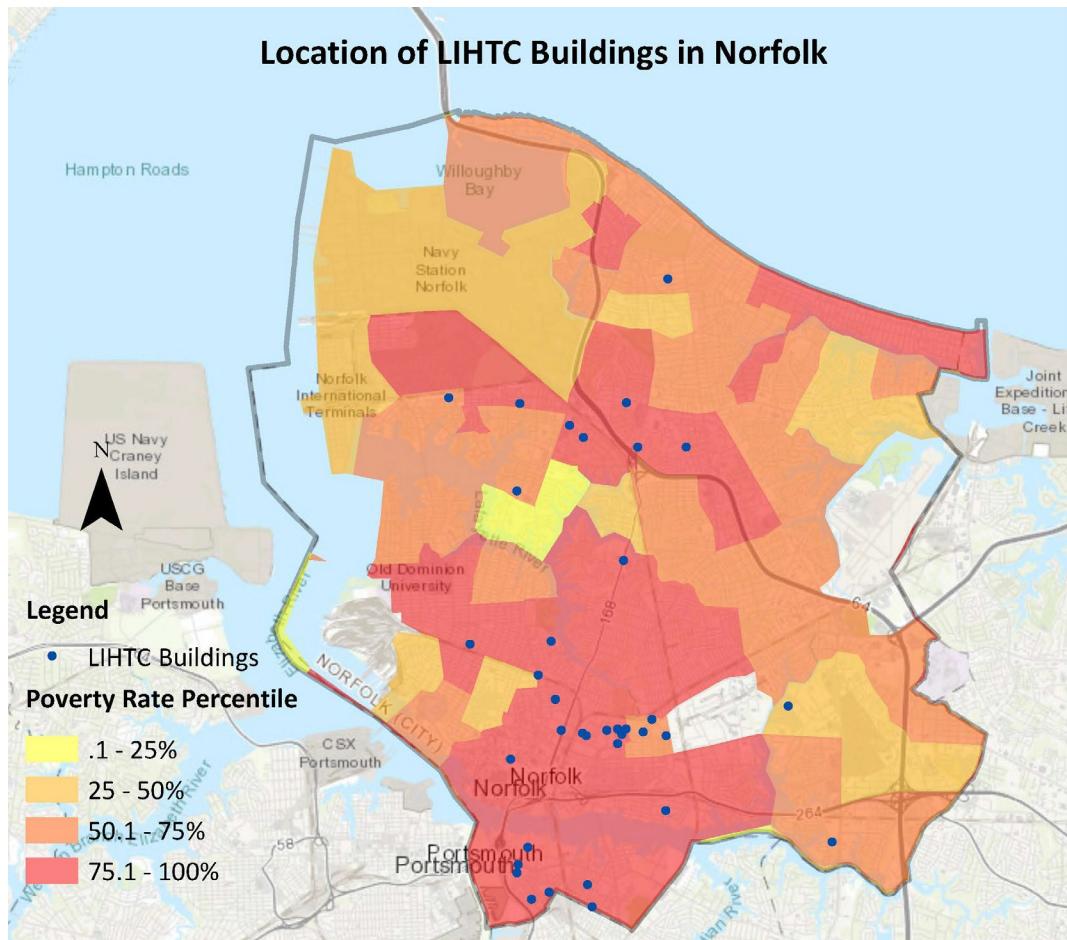
 Source: HUD, Office of Policy Development and Research, <https://hudgis-hud.opendata.arcgis.com/datasets>

As shown in the table below, LIHTC properties in Norfolk are heavily concentrated in the 23504 ZIP code, the same location where there is a high concentration of R/ECAPs, as explained in Section VII of this report. The second highest concentration of properties (and units) is in the Northwest section of Norfolk, adjacent to the Naval Base, also an area of relatively high concentration of poverty as shown in the map provided below. Most LIHTC properties in Norfolk are in areas that have poverty rates that are higher than 75 percent of ZIP Codes nationally.

Table 89: LIHTC Properties by ZIP Code, 2019

ZIP Code	Total Properties	% Properties	Total Units	% Total Units
23502	3	7.69%	432	11.01%
23503	1	2.56%	434	11.06%
23504	16	41.03%	1189	30.30%
23505	7	17.95%	975	24.85%
23509	1	2.56%	153	3.90%
23510	1	2.56%	120	3.06%
23513	1	2.56%	64	1.63%
23517	1	2.56%	60	1.53%
23523	7	17.95%	463	11.80%
(blank)	1	2.56%	34	0.87%
Grand Total	39	100.00%	3924	100%

Figure 41: Location of LIHTC Buildings in Norfolk



Source: HUD User, LIHTC Database

It's worth noting that the Norfolk Redevelopment and Housing Authority (NRHA) was recently successful in obtaining \$11,000,000 in LIHTCs to construct 70 project-based voucher units in Grandy Village, a public housing complex owned and operated by the NRHA. These units are not reflected in the data above which only shows units placed in service as late as 2019. The purpose of pointing out where the most concentration of LIHTC units are located in Norfolk is to highlight that low-income housing programs, such as LIHTC, are not necessarily serving to desegregate communities by race and in some cases could be exacerbating segregation and lack of housing choice. This could be partially explained by the State's criteria for LIHTC siting, which assigns points based on proximity to low-income communities. Continuing to incentivize LIHTC development only in low-income areas could serve to exacerbate segregation and limit housing choice.

XII. Fair Housing Trends and Complaints

Reviewing fair housing complaint trends is critical in assessing a broad landscape of discrimination in housing access. This chapter reviews the enforcement process of the Fair Housing Act including the fair housing complaints filed at the local and federal levels to assess trends, emerging issues, and potential barriers to fair housing access, enforcement, and education in the context of Norfolk.

Key Data and Insights:

- Disability cases were the most common in 2019, the last full year of formal reporting available, closely followed by race cases. (C)
- 68 formal fair housing complaints were filed with the State between 2012 and 2021. (D)

City of Norfolk Actions:

- The City maintains a fair housing ordinance found in Chapter 45.1 of the Municipal Code. The Code was updated in 2022 to prohibit housing discrimination in Norfolk based on “source of funds,” which is consistent with the same State policy that was established in 2020.

A. HUD Complaint and Investigation Process

According to the HUD Office of Fair Housing and Equal Opportunity (FHEO), FHEO begins its complaint investigation process shortly after receiving a complaint. Under the Fair Housing Act, complaints must be filed within one year of the last date of the alleged discrimination. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate.

When FHEO investigates the complaint, it will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. HUD will notify the parties about the results of its investigation in a written report of its findings. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.⁸⁴

i. Intake

When an individual reports possible discrimination, FHEO checks whether a formal complaint can be filed under one of the laws it enforces. FHEO may conduct an interview with the individual who wishes to file the complaint. Where appropriate, FHEO will draft a formal complaint and have the individual review and sign the complaint and notify the parties that a complaint has been filed. As part of HUD’s Fair Housing Assistance Program, FHEO may refer a

⁸⁴ Department of Housing and Urban Development: FHEO Complaint and Investigation Process, [Department of Housing and Urban Development, FHEO Complaint and Investigation Process](#)

fair housing complaint to a state or local government agency for investigation. The Virginia Fair Housing Office, operating as part of the Department of Professional and Occupational Regulation, is the agency responsible for housing discrimination complaints alleged anywhere in the Commonwealth of Virginia.

ii. Investigation

After a formal complaint is filed, FHEO will investigate the allegations. HUD will assign an investigator to investigate the allegations made by the complainant. If more information is needed, the investigator will follow-up. Generally, complaints should include a timeline of events, location of the events, any people who were present with the events occurred, any other people who might have information related to the complaint, and any relevant documents. The party against whom the complaint was filed will be notified and provided an opportunity to respond to the allegations. Evidence may be gathered in many ways, including interviews with witnesses, collecting documents and inspecting properties. After completing the investigation, FHEO will send a written report of its findings.

iii. Conciliation or Voluntary Compliance

At any time during the investigation process, the parties can resolve the complaint under terms that are acceptable to the parties and HUD. HUD will try to help the parties resolve the complaint through a voluntary agreement, but no party is required to accept an agreement. If the parties agree, HUD will prepare the agreement and require signatures. If an agreement is signed, HUD will close the investigation and monitor compliance with the agreement. HUD may resolve the investigation through a document called a Conciliation Agreement, a Voluntary Compliance Agreement, or both.

iv. Legal Action

If appropriate, FHEO will take actions to enforce the law. Based on the findings the government may bring a Fair Housing Act or other civil rights case. Examples of relief may include compensation for victims, changes to policies and procedures, and/or training. When government brings a legal action, it does not charge any fees or costs to the victims of discrimination. Cases before HUD Administrative Law Judges are handled by HUD's Office of General Counsel, and cases in the federal courts are handled by the US Department of Justice.

B. Filing a Complaint with the Virginia Fair Housing Office

Individuals in Norfolk who feel that they have experienced a fair housing violation may submit it to the federal government through the process outlined in the previous section or they may file directly with Virginia's Fair Housing Office (FHO). The FHO is listed as a local partner to HUD as a Fair Housing Assistance Program agency (FHAP). As reported in HUD's Annual Report on Fair Housing in FY 2020, there are 76 FHAPs across the country who are responsible for reviewing housing discrimination complaints within their jurisdiction to determine if there is a violation of

a Fair Housing Law.⁸⁵ Individuals in Norfolk who believe that a discriminatory housing practice has occurred or is about to occur may submit a claim with the FHO by completing a form and providing support documentation to back-up the allegation. The FHO aids anyone who needs help completing the form.

Complaints, or allegations, should be submitted as soon as the alleged discriminatory practice has occurred but no later than one year after the occurrence or termination of the alleged discriminatory housing practice. Complaints may be submitted by mail, e-mail or facsimile. The FHO advises that an individual may also commence a civil action in the appropriate United States District Court or state court within two years after the occurrence or termination of an alleged discriminatory housing practice.

The FHO will not assign an investigator to the case until the complaint meets specific standards under the Fair Housing Law and Fair Housing Regulations.⁸⁶

C. Fair Housing Complaints Filed with HUD

The FHEO will investigate complaints that fall into one of two categories:

- Discrimination under the Fair Housing Act (including housing that is privately owned and operated)
- Discrimination and other civil rights violations in housing and community development programs, including those funded by HUD

Complaints related to the Fair Housing Act may include discrimination in renting or buying a home, getting a mortgage, seeking housing assistance or engaging in other housing-related activities. Discrimination applies to protected classes which includes, race, color, national origin, religion, sex (including gender, gender identity, sexual orientation and sexual harassment) familial status and disability. Protected classes may file a complaint against property owners, property managers, developers, real estate agents, mortgage lenders, homeowner associations, insurance providers and others who impact housing opportunities.

Complaints related to civil rights violations in housing and community development programs may include discrimination or other violations of civil rights in HUD programs (for example, failure to ensure meaningful access by persons with limited English proficiency). Laws that apply to these types of complaints include:

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973 (disability)

⁸⁵ HUD “State of Fair Housing, FY 2020 Annual Report to Congress”,
<https://www.hud.gov/sites/dfiles/FHEO/documents/FHEO-Annual-Report-FY2020.pdf>

⁸⁶ “Housing Discrimination Complaint Process” Department of Profession and Occupational Regulation,
https://www.dpor.virginia.gov/sites/default/files/Virginia%20Fair%20Housing/F493-02FH_COMP_pdf.pdf

- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

Anyone may file a complaint against any recipient or subrecipient of HUD financial assistance, states, local governments, and private entities operating housing and community development and other types of services, programs, or activities.⁸⁷ A single complaint can be filed based on more than one basis. As shown in .

Table 90, the most prevalent basis for complaints over the recorded time period were related to disability or race compared to all other bases. Complaints based on disability had the highest record at 788 while race based complaints were behind disability at 529 cases. All other bases for complaints were much lower than disability and race. Interestingly, in 2019, the most recent full year of filed complaints available, the disability related complaints were at their highest rate, race related complaints were at their 4th highest rate, sex related complaints were at their 3rd highest rate and retaliation related complaints were at their highest rate. This trend in 2019 could indicate that complaints in these basis areas are on the rise.

Table 90: Cases Filed with HUD FHEO by Bases, Virginia, 1/1/2006-6/30/2020

Year	Race	Color	National	Hispanic	Disability	Familial	Religion	Sex	Retaliation	Total
2006	59	1	30	22	52	21	2	8	3	159
2007	44	1	14	4	36	22	6	16	4	120
2008	34	1	7	3	49	21	1	12	1	115
2009	49	1	25	11	59	26	10	10	9	152
2010	55	5	21	7	53	24	5	30	4	142
2011	33	2	17	5	44	15	5	7	3	101
2012	18	5	16	5	38	8	1	8	6	81
2013	24	3	6	2	46	11	1	4	5	82
2014	30		9	3	48	21	1	8	3	108
2015	44	2	21	17	52	12	1	10	7	115
2016	25	2	9	4	54	8	1	7	8	92
2017	22	3	7	4	43	17	3	8	4	80
2018	26	1	9	2	75	17	4	3	16	122
2019	48	2	10	4	87	14	3	16	18	152
2020	18	1	3	0	52	8		5	2	80
Total	529	30	204	93	788	245	44	152	93	1,701

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

⁸⁷ "File a Complaint" HUD Fair Housing and Equal Opportunity,

https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint#_Types_of_Complaints

Table 91 includes data from the same source as the table above but drills down locally for an analysis of fair housing cases filed in Norfolk. At a local scale, disability and race are also the highest bases for complaints with disability complaints at 25 overall and race complaints at 17 overall. Similar to the statewide rates, 2019 was the highest year for disability complaints and the third highest for race-based complaints.

Table 91: Cases Filed with HUD FHEO by Bases, Norfolk, 1/1/2006-6/30/2020

Year	Race	National	Hispanic	Disability	Familial	Religion	Sex	Retaliation	Total
2006	1	1		4	1	1			7
2007				1	1		2	1	4
2008				3	1				4
2009		1	1	2	1		1		5
2010	4	1	1		2		2		6
2011	4	1	1	2			1	1	6
2013					1				1
2014				1					1
2015	1				1				2
2016				3					3
2017	2			2					4
2018	1			1				1	2
2019	3			5			1	2	7
2020	1			1					2
Total	17	4	3	25	8	1	7	5	54

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

D. Fair Housing Complaints Filed Locally

Finally, a complainant may choose to file a complaint locally in Norfolk which are handled by the Fair Housing Board, a division of the Virginia Fair Housing Office within the Department of Professional and Occupational Regulation. According to their website, the Virginia Fair Housing Office receives an average of 180 complaints each year. The majority of complaints involve disability or racial discrimination while familial status complaints continue to rise.⁸⁸ The data in the table below was provided directly from the VA Department of Professional and Occupational Regulation upon request. As noted by the Assistant Fair Housing Administrator in correspondence while sharing this data, the Department does not track complaints received from HUD separately from those received by other sources. It is possible that the same complaint was filed with HUD and the Commonwealth and thus reflected in both tables in this section.

Table 92 shows a total of 68 complaints filed with the State between 2012 and 2021. As mentioned previously, each complaint can contain more than one basis therefore the number of complaints and basis will not always be equivalent. Similar to the complaints filed directly

⁸⁸ Virginia Fair Housing, <https://www.dpor.virginia.gov/FairHousing/>

with HUD, the majority of complaints are based on disability discrimination or race, in that order. Of note about the VA FHO is that they include two basis categories that are not included in HUD's basis, elderliness and veteran status. Veteran status is not included in the table below due to an inconsistency in the data provided. Moreover, while the commonwealth has a fair housing law that prohibits housing providers to discriminate based on source of income, the FHO does not include this prohibition as a basis for complaints, so it is not possible to analyze the number of complaints that are filed based on source of income discrimination. All of the complaints noted below are indicated as "closed" except three, which are listed as "monitoring conciliation agreement". The data description provided defines cases with the status "closed" as a complainant that is uncooperative or cannot be located or if the complaint is withdrawn. If the status is indicated as "monitoring conciliation agreement" it means that the parties agreed to terms for settlement.

Table 92: Fair Housing Complaints with the VA FHO by Year and Basis

Year	Total	Race	Nationality	Disability	Familial	Religious	Sex	Elderliness
2012	2	1	0	2	1	0	0	0
2013	4	0	0	3	1	0	0	1
2014	5	2	0	3	0	0	0	0
2015	5	1	0	2	1	1	0	0
2016	11	6	2	9	1	0	5	2
2017	7	4	1	1	0	1	2	1
2018	9	6	1	5	0	0	2	3
2019	12	7	0	9	1	0	4	1
2020	10	4	1	5	0	1	1	0
2021	3	1	0	2	0	0	0	1
Total	68	32	5	41	5	3	14	9

Source: VA Office of Fair Housing, March 7, 2022

E. Complaint Trends

As mentioned earlier, during almost 14 years from 2006 through June 2020, 1,701 cases of Fair Housing Act complaints filed at the HUD FHEO office were based in Virginia and 54 of those were from Norfolk.

Table 93 shows the number of complaints filed at the federal FHEO office per year in Virginia and Norfolk. Since cases filed in 2020 only account for half of the year, cases from 2020 are not considered in the overall comparison of years but 2020 data is still reflected in the table below for reference.

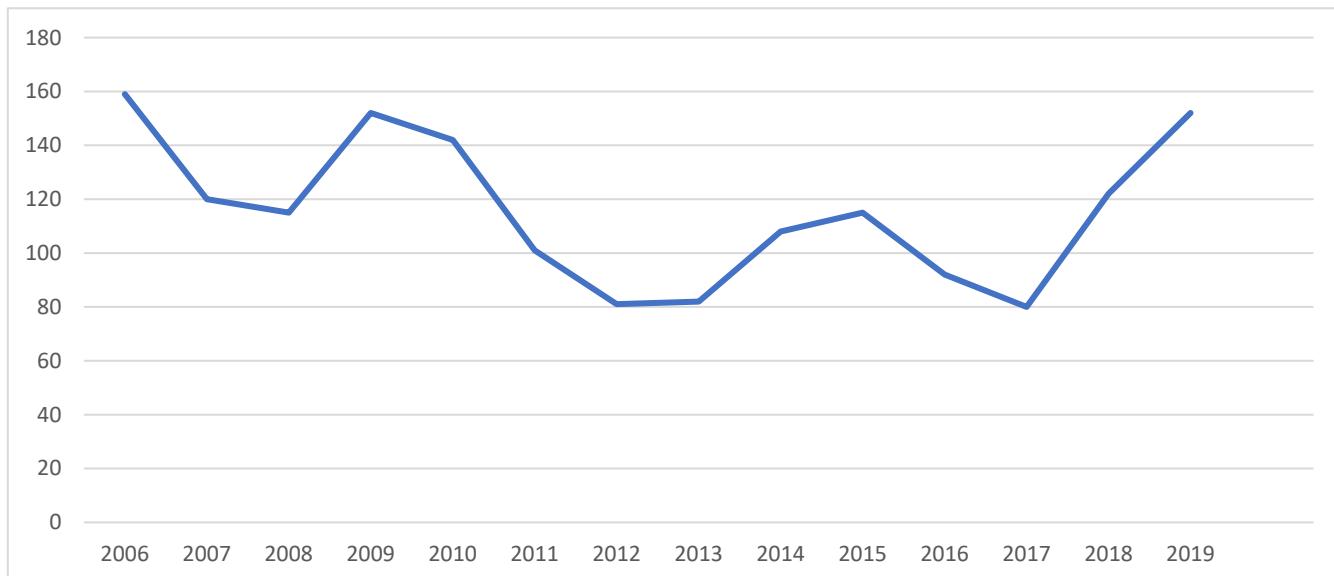
Table 93: Fair Housing Cases Filed by Year, 2006 to June 2020

Year	Total Cases, VA	Total Cases, Norfolk
2006	159	7
2007	120	4
2008	115	4
2009	152	5
2010	142	6
2011	101	6
2012	81	1
2013	82	1
2014	108	2
2015	115	3
2016	92	4
2017	80	2
2018	122	7
2019	152	2
2020	80	7
Total	1,701	54

Source: HUD FHEO Filed Cases, 2020,

When FHEO complaint data is analyzed using a trend line, both Norfolk and Virginia show a clear increase in complaints filed since 2018.

Figure 42: Norfolk FHEO Complaints, 2006-2019



During interviews with stakeholders, at least two expressed interest in the City advocating for more transparency in the fair housing complaint and follow-up process. More generally, there is a feeling among stakeholders that there is a lot of fair housing non-compliance from property managers and landlords that is likely not addressed due to lack of enforcement mechanisms and/or a lack of will to follow-through with complaints in a timely manner.

XIII. Review of Prior and Current Actions Taken to Affirmatively Further Fair Housing

Key Data and Insights:

- The City has taken steps to counteract fair housing impediments. (C)
- The City began the St. Paul's Transformation that includes the phased redevelopment of 1,674 public housing units in 2018. (D)

City of Norfolk Actions:

- In 2016, a Norfolk Affordable Housing Strategy was created by HR&A for the City of Norfolk in 2016. The study investigated current market conditions and housing needs and then proposed recommended housing strategies, many of which have been implemented. The City of Norfolk is in the process of procuring an updated housing study, to be completed in FY 2023.
- The City of Norfolk's comprehensive plan, PlaNorfolk 2030 is in the process of being updated. The new PlaNorfolk 2050 will be used to guide decision-making about physical development and public infrastructure. It is intended to be sufficiently flexible to respond to changes in development patterns and contains the broad outlines neighborhoods will use to guide and plot their path to the future.

A. Affirmatively Furthering Fair Housing

Affirmatively furthering fair housing requires overcoming historic patterns of segregation, promoting fair housing choice, and fostering an inclusive community. Identifying Norfolk's barriers to fair housing requires a comprehensive assessment of previously recorded impediments, actions taken to address them and current conditions that may continue to restrict housing choice for people protected under state and federal fair housing laws.

With such an assessment in mind, this section presents the previously identified impediments to fair housing choice and a summary of the actions taken to address those challenges. The analysis will help outline the underlying conditions and trends still relevant in Norfolk.

B. Previous Impediments to Fair Housing Choice

Analysis of Impediments to Fair Housing Choice Hampton Roads Region, Virginia 2011

The last analysis of impediments took place in 2011 and was conducted by Mullin & Lonergan Associates, Inc. for Hampton Roads Region of Virginia. The report was regional in scope and had a subsection on each city of the region. The report focused on overall updates in agencies and new legislation like the Virginia Human Rights Act for the region. The regional profile of each city used census data, CHAS, HMDA data, and areas of racial or ethnic concentration HUD data.

The 2011 report found concerning patterns of segregation and discrimination. There was Black or African American racial concentration in twenty-seven census tracts in Norfolk and Asian racial concentration in one census track. Two census tracts with majority Black populations of over 90 percent of the tract, 35.01 and 52, had foreclosure rates of 5.1 percent that were more than double the average foreclosure rate of the city. The White and Black populations of Norfolk were more geographically segregated than in 77 percent of the state's most populated cities and towns. There was also immense racial inequality at the income, poverty, and unemployment level. Black residents were also twice as likely to be denied mortgage financing as white residents, even for high income housing, a pattern that is emblematic of racial discrimination.

The report also found challenges with affordable housing. Norfolk experienced a net loss of housing stock between 1990 and 2009 of 6,600 units or 6.7 percent of the housing stock. Norfolk lost over 12,000 housing units renting for less than \$500 between 2000 and 2008, while units renting for more than \$1,000 increased by 10,000 units. Minimum wage and single-income households could not afford housing units renting for the HUD fair market rent in Norfolk. Persons receiving SSI as sole income could not afford a one-bedroom unit at fair market rate of \$781. Among renters in Norfolk, elderly and Hispanic households experienced a disproportionately higher rate of housing problems than other renters. Housing problems were defined as spending 30 percent or more on rent, lacking kitchen and plumbing, and overcrowding more than one person/room.

The report also investigated the zoning code and found that mobile homes were not an impeded development type, but that the zoning code also limited unrelated people to four people, something that could limit housing choice. For fair housing, the report found that between 2004 and 2009, a total of 35 fair housing complaints had been filed, but ten of the complaints had resulted in "no violation" finds.

The report found that since the previous analysis of impediments completed in 2003, the City has taken actions to assist low-income elderly and disabled populations in remaining in their home, including CDBG funds to support maintenance and improvement, including adaptive modifications. Norfolk had also implemented a "Housing First" strategy and utilized HOME funds to expand housing opportunities for 69 first-time homebuyers in 2008. Lastly, the city had attempted to address lack of information regarding fair housing by partnering with HRCHRB to conduct further outreach including materials, workshops, posters, homeowner education, landlord outreach.

The report concluded on remaining and new major impediments and made recommendations for each impediment.

Table 94: Fair Housing Impediments from 2011 Report

2011 Impediment	Recommendations to the City
Norfolk lacks an over-arching fair housing policy that establishes the foundation for a comprehensive integration policy in Norfolk	Adopt a diversity policy with commitment to ending segregation, make location-conscious investment of funds in development and redevelopment of housing, and continue to participate in the Hampton Roads Community Housing Resource Board
There is a lack of housing units available to accommodate larger families	Set a goal of facilitating the development of 3+ bedroom rental housing.
Non-white populations have comparatively low homeownership rates.	Increase ownership opportunities, continue aiding non-profit affordable housing developers, and strengthen partnerships with local lenders.
Inadequate housing supply for persons with disabilities.	The City should require 10 percent of all newly constructed multi-family to be accessible, work with disability advocates, sponsor an annual workshop, and other educational opportunities for building and housing staff.
Persons with limited English proficiency (LEP) may not be able to fully access federally funded services provided by the City.	The City should perform the four-factor analysis to determine if it must prepare a Language Access Plan
The City does not track whether members of the protected classes are represented on City boards and commissions dealing with housing issues	Schedule a recruitment period for new board and commission applicants with an emphasis on recruiting members of the protected classes.
Mortgage loan denials and high-cost lending disproportionately affect minority applicants.	HUD-certified housing counselors should target credit repair education through existing advocacy organizations, there should be more analysis of HMDA data, and the City should engage in a communication campaign that markets home ownership opportunities to all minorities regardless of income.
Foreclosures appear to disproportionately affect minority households in Norfolk.	The City can mitigate the impacts of foreclosure by supporting increased buyer education and counseling, as well as supporting legislative protections for borrowers to assist them in meeting housing costs.

C. Actions Taken

This section provides a summary of actions taken that may address impediments to fair housing identified in the 2011 report. The actions outlined below were those discovered during the compilation of this report and may not represent every action taken since 2011. Furthermore, it's worth noting that actions were pursued by various entities including non-profits, City agencies and state and local government. Not all actions are consistent with the recommendations from 2011 but nonetheless address an identified impediment.

Table 95: Actions Taken Since 2011 Regional AI Report

2011 Impediment	Actions Taken since 2011
1. Norfolk lacks an overarching fair housing policy that establishes the foundation for a comprehensive integration policy in Norfolk	<p>The City maintains a fair housing ordinance found in Chapter 45.1 of the Municipal Code. The Code was updated in 2022 to prohibit housing discrimination in Norfolk based on “source of funds,” which is consistent with the same State policy that was established in 2020.</p> <p>Note, the City hosts a webpage about fair housing, but it is not a stand-alone explicit statement from the City. It is scheduled to be moved to a dedicated site in 2022.</p>
2. There is a lack of housing units available to accommodate larger families	<ol style="list-style-type: none">1) The Missing Middle Pattern book is an attempt to fill in vacant lots with more dense housing. This does not automatically lead to larger units, but it encourages creation of more units and larger units are usually more economical to build.2) The City launched People First, a case management program for residents of Tidewater Gardens as part of its redevelopment. A component of the People First program was a Landlord Incentive Program to help relocate residents living at Tidewater Gardens. The program is designed to mitigate the barriers that HCV holders encounter.
3. Non-white populations have comparatively low homeownership rates.	This impediment does not have any new related actions that were discovered during research for this report.
4. Inadequate housing supply for persons with disabilities.	This impediment does not have any new related actions that were discovered during research for this report.
5. Persons with limited English proficiency (LEP) may not be able to fully access federally funded services provided by the City.	This impediment does not have any new related actions that were discovered during research for this report.

2011 Impediment	Actions Taken since 2011
6. The City does not track whether members of the protected classes are represented on City boards and commissions dealing with housing issues	The City requests racial and ethnic information from board applicants through the on-line application here . Presumably, anyone could file a request for public information to retrieve the cumulative data to review City board representation. In addition, the Southeastern Virginia Homeless Coalition released Racial Disparities Report in November 2021 that includes three sections on the racial and ethnic make-up of their partner agencies boards and their own governing board.
7. Mortgage loan denials and high-cost lending disproportionately affect minority applicants.	This impediment does not have any new related actions that were discovered during research for this report.
8. Foreclosures appear to disproportionately affect minority households in Norfolk.	This impediment does not have any new related actions that were discovered during research for this report.

D. Other Action and Plans Taken

In addition to the actions taken outlined previously, the City of Norfolk has also undertaken an array of actions to address the direct and indirect impacts of the impediments presented in 2011. These actions are described in more details below.

St. Paul's Transformation Project

The St. Paul's Community was home to the region's highest concentration of public housing with 1,674 aging units that do not meet modern building standards. The area floods regularly which is only worsened by the strained infrastructure. Furthermore, the lack of connectivity to the rest of the city creates a sense of physical, social and economic isolation in the community. With a recent award from HUD's Choice Neighborhood Initiative, the City began demolition and resident relocation in the Tidewater Gardens neighborhood, one of three residential neighborhoods in the St. Paul's community. Once completed the new Tidewater Gardens will provide a 26-acre resilient park, to mitigate flooding issues that currently occur in the neighborhood and more than 700 units of mixed-income housing with approximately one-third subsidized housing, one-third affordable housing that accept vouchers and are income restricted and one-third as market rate. Tenants of the original community will have the right to return to the subsidized and affordable units as completed. This right is paired with the supportive services offered by the People First program before, during and after relocation and for up to five years.

In 2019, Norfolk was sued by tenants and public housing advocates who objected to the St. Paul Transformation Project on the grounds that City and NHRA plans to demolish Tidewater Gardens, Young Terrace, and Calvert Square public housing projects to replace them with mixed

use developments violated fair housing and would further segregate the city. They argued that efforts to relocate tenants with vouchers would result in tenants moving to low opportunity neighborhoods further from transit, jobs, and other support and further concentrate poverty in the city. In 2021 after two years of litigation, the City and plaintiffs reached a settlement out of court that included the City taking steps to increase the use of vouchers in “areas of opportunity” and continuing to provide robust relocation support. The agreement also increased the number of units onsite set aside for public housing residents from 226 to 260, includes the construction of 83 offsite units reserved for public housing residents and that the City and NRHA will “make good faith efforts” to build an additional 82 offsite project-based voucher units in specific census tracts by 2027. Other agreements included NRHA increasing the purchasing power of housing choice vouchers in two ZIP codes and the City retaining a consultant to evaluate and advise the People First program.⁸⁹

Zoning Ordinance (2018)

Norfolk City Council adopted a new zoning ordinance in 2018. While the ordinance is focused primarily on encouraging resilient development that will address the flooding challenges that are foretold from recent experience and scientific data it also has some elements that encourage more housing types such as the allowance of Accessory Dwelling Units (ADUs) in many parts of the city. ADUs are not expected to be the answer to all the city’s affordable housing challenges but it is one step in the right direction to encourage more housing stock and diversity of housing types at different price points than traditional single-family homes.

Norfolk Affordable Housing Study (2016)

In 2016, a Norfolk Affordable Housing Strategy was created by HR&A for the City of Norfolk in 2016. The study investigated current market conditions and housing needs and then proposed recommended housing strategies. The current market conditions were categorized into housing market, rental market, and designated affordable housing takeaways.

For the current market conditions, the report posited that Norfolk was becoming a more competitive housing market within the MSA but still operated in direct competition with its neighbors. Development had increased and vacancy had decreased but there was still tepid population growth and housing competition with neighboring communities. Within the city, housing market conditions differ by neighborhood with most growth concentrated downtown. This report designated Downtown and Colonial Place/Riverview as strong submarkets, Ocean View, Campostella, and Park Place as tipping point submarkets, and Norview and Greater St. Paul as weak submarkets. Between 2010 and 2016, there were 13 apartment projects built with

⁸⁹ “Lawsuit aiming to halt Norfolk’s public housing redevelopment dismissed” Wavy News, <https://www.wavy.com/news/local-news/norfolk/lawsuit-aiming-to-halt-norfolks-public-housing-redevelopment-dismissed/#::text=%E2%80%9CThe%20City%20is%20pleased%20that%20the%20lawsuit%20challenging,assisting%20with%20the%20development%20of%20this%20uplifting%20plan.%E2%80%9D>

eleven projects in the pipeline, most concentrated around Downtown. At the time of the report, 40 percent of planned multi-family was located in Downtown.

For rental housing, the report found that there was a rental gap for all renters making \$56,700 or under, with a large rental gap of about 16,500 units for renters making under 50 percent AMI (\$35,450). Between 2009 and 2014, the percent of extremely rent-burdened households increased from 24 percent of households in 2004 to 29 percent of households in 2014. The report found that a large portion (42 percent) of renters lived in single-family housing units, which at that time was also 71 percent of the total housing stock. Furthermore, most of the rental housing were ten units or less.

For affordable housing specifically, the report found that 20,000 of the total stock of 98,000 housing units was considered “affordable”, with 12,171 units of naturally occurring affordable housing, 5,114 units of NRHA housing, and 2,697 units of LIHTC funded developments in the city. While the LIHTC units were less concentrated in high poverty areas and more similar in size, construction, and location to market rate housing, the NRHA affordable units were almost exclusively concentrated high poverty neighborhoods. For other affordable housing types, the report found that public housing was concentrated in high poverty areas and in disrepair. Naturally occurring affordable housing, though, was well distributed but insufficient for the population and the housing stock was aging.

The report recommended an overall affordable housing strategy with the main goal of deconcentrating clusters of poverty and strengthening neighborhoods throughout the city. The plan proposed that Norfolk should deconcentrate poverty by developing mixed-income rental housing through the LIHTC voucher and inclusionary housing policy. The plan also proposed Norfolk redevelop public housing by focusing on master planned redevelopment, vouchers, and landlord outreach. Finally, the plan proposed that Norfolk should strengthen neighborhoods three ways. First, the City should increase homeownership through the sale of vacant city-owned residential lots, the development of subsidies, and down payment assistance. Second the City should focus on small rental rehabilitation to preserve smaller naturally affordable ten-unit or less multi-family through a rental rehabilitation fund, increased code enforcement, and rental inspections. Third, the City should develop new affordable rental housing through focusing on LIHTC financing.

To achieve the above stated goals, the report proposed that the City utilize CDBG and HOME funds as well as establish an affordable housing trust fund, use performance-based grants for large-scale residential projects, contribute public land, and establish assessment districts. Other funding mechanisms that were proposed included using real estate transfer taxes, hotel tax and bed fees, vacancy registration fee, expiring tax abatements, new tax on short-term rentals, and property levies as potential sources for the affordable housing trust fund. The City is in the process of reporting progress against the goals of the report and plans to update by 2023.

Comprehensive Plan ("General Plan")

As required by state law, Norfolk updated its Comprehensive Plan in 2013, *plaNorfolk2030*. The plan is intended to memorialize policies that provide a roadmap for the future. The plan included Ch. 7 – Ensuring Housing Choices for All which describes three key housing issues that need to be addressed, according to the City's planning staff these issues are:

1. Making Norfolk's housing stock more competitive in the regional real estate market
2. Ensuring that housing is affordable
3. Meeting housing needs of the special needs population

To address these issues, the plan describes three goals with individual metrics to determine success of each. In accordance with the Code of Virginia (15.2-2230), the Comprehensive Plan shall be reviewed at least once every five years by the local planning commission to determine whether it is advisable to amend the plan. The Comprehensive Plan is currently under review for update as of spring 2022.

XIV. Impediments to Fair Housing Choice

Key Data and Insights:

- Some impediments identified in the 2011 AI are still applicable, including housing quality and home lending disparities. (0)
- Some trends have reversed since 2011 but remain considered impediments due to new market pressures, notably the demand for smaller units, whereas in 2011, larger units were in shorter supply relative to demand.
- The City of Norfolk has many programs, initiatives, and tools available to begin to address the wide range of impediments, but multi-agency collaboration will be critical to solve complex challenges.

A. 2021 Impediments

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

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

There are three main components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an “action, omission, or decision.”⁹⁰

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

Additionally, some potential barriers do not necessarily fall within HUD’s definition of “impediment” or require more in-depth research but have been noted in this document to

⁹⁰ Fair Housing Planning Guide, Vol. 1, HUD, <https://www.hud.gov/sites/documents/FHPG.PDF>

provide context and additional information regarding current fair housing conditions in the City of Norfolk.

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

1. **Affordable Housing:** As described in greater detail in Section V.F, more than 80 percent of low-income residents pay more than 30 percent of their income on housing. Moreover, protected class households present the largest share of severely cost burdened households, those that pay 50 percent or more of their income on housing. A lack of affordable housing for renters and limited affordable homeownership opportunities for current Norfolk residents has been exacerbated by extreme national housing market conditions in recent years. Other identified impediments, notably Housing Age and Quality, Diversity of Housing Types, and Home Lending Disparities all contribute to ongoing affordable housing concerns.
2. **Housing Age and Quality:** Norfolk is an old city relative to other U.S. cities and much of its housing stock is historic. Older homes can hurt affordability due to high maintenance and utility costs, putting greater pressure on fixed- or lower-income residents. Historic housing stock is also less likely to be accessible, potentially limiting choice for seniors and persons with disabilities. Older housing also poses a greater chance of exposure to detrimental environmental health conditions caused by lead and mold, which can be costly to remedy (See Impediment Seven, Environmental Health and Justice).
3. **Diversity of Housing Types:** The current trend in new housing types may not meet the needs of Norfolk's aging population and decreasing household size since 2014. As described more thoroughly in Section V.B, the number of larger units, those units with 4-and 5-bedroom units has increased since 2014 while the proportion of smaller units have decreased. Note, this impediment rationale is a reversal from the description of the same impediment noted in the 2011 regional Analysis of Impediments. In the 2011 report, the projection of larger households in Norfolk warranted a call for units with more bedrooms. Moreover, it is worth noting that qualitative research still suggests that protected class households with more household members have an extremely difficult time finding suitable to accommodate all family members, but we appreciate that this is often a challenge related to access to existing units, not an absence of units. Zoning ordinance changes in recent years that prohibit most manufactured housing effectively eliminate a flexible and affordable housing type (See X.A.iv for more information). Table 68 also indicates a disparity in loan originations among applicants seeking to finance manufactured housing, further limiting it as an affordable option.
4. **Accessible Housing:** Norfolk has a large population of persons with disabilities living in poverty and a lack of units that are accessible. See Section IV.A.vi for more details. Low-

income residents and members of protected classes that cannot afford to make accessible accommodations to their units are limited in their housing options.

5. **Home Lending Disparities:** Protected classes face challenges to leveraging home lending opportunities and market capital. As presented in Section 0, the high incidence of mortgage denials and general access to home lending in Norfolk correlates with historic redlining and illuminates current limitations for low-income communities and protected classes to access capital, potentially indicating bias or discrimination.
6. **High Eviction Rates:** Based on data collected over the past 10 years and discussed in detail in Section V.J, Displacement and Evictions, Norfolk has one of the highest eviction rates in the country. Interviews indicate that it is relatively easy to file for eviction in Norfolk, with low fees and minimal legal barriers for landlords, which could contribute to an excessive burden on tenants facing these filings. Moreover, it is generally understood that eviction disproportionately impacts vulnerable populations and protected classes, such as low-income women, women of color and families with children and minorities at a higher rate than other sub-populations.⁹¹
7. **Environmental Health and Climate Justice:** Residents face risks inside and outside their homes. Inside, the potential for high concentrations of lead-based paint in much of the city's historic housing stock makes it more likely that the negative impacts of lead-based paint will disproportionately affect vulnerable populations with children. As described in Section VIII.C., research demonstrates a strong link between lead exposure in children and irreversible development delays and brain damage. Outside the home, Norfolk is a coastal city adapting to climate changes sooner than most other American cities. The risk of flooding threatens residents' livelihoods and assets as well as impacts opportunities for housing development that could be expanding housing choices. Additionally, low-income neighborhoods are more likely to be located near polluting activities, including heavy industry and highways. As described in Section X.A, new rezoning for multi-family housing in Norfolk is required by the Comprehensive Plan to be located adjacent to arterial roads or existing multi-family development or transit stops (which are already primarily located near high-traffic roads), potentially contributing to air pollution-related environmental justice issues and not serving to deconcentrate poverty.
8. **Fair Housing Policy and Compliance:** Based on the data collection process and stakeholder interviews used to develop the information provided in Section XII, we pose that despite national and state laws about fair housing, it is commonly understood that the burden of proof is on the already over-taxed victims of non-compliance with fair housing laws. Moreover, lack of public awareness about fair housing laws and how, or where, to file a complaint limits the ability of authorities to address non-compliance or keep a record at minimum.

⁹¹ "Why Eviction Matters" Eviction Lab, <https://evictionlab.org/why-eviction-matters/#who-is-at-risk>

i. Other Considerations and Contributing Factors

While researching potential impediments to fair housing choice, the authors noted several factors that might impact fair housing choice but do not necessarily meet the definition of an impediment as defined by HUD. This section notes some of those most commonly discussed during stakeholder interviews and mentioned in responses to the public survey. These other factors will often require a response that goes beyond housing policy or is fundamentally rooted in fair housing choice. These considerations are meant to invite further discussion about these important issues.

1. Perceptions of Crime and Safety

Many stakeholder interviews and most public survey responses indicated strong concerns about public safety and the effects of crime on housing choice. Whether or not there is empirical evidence to support the community perceptions, their ubiquity warrants a response to either dispel myths or address real issue. Given the complexity and severity of crime and criminal justice as well as its clear intersection with housing concerns, the authors recommend that City of Norfolk executive leadership and those involved in criminal justice participate in housing discussions to seek approaches that build communities of opportunity and prioritize high-quality, fair housing as integral to any long-term criminal justice strategy.

2. NIMBYism

Stakeholders indicated that NIMBYism (Not-in-my-backyard-ism) has slowed or stopped various housing developments, particularly multi-family, rental, and affordable projects. Like perceptions of public safety, NIMBYism is sometimes rooted in fearful perceptions of change or difference. Bold, equity-focused land use planning and direct community conversations about the critical nature of fair and affordable housing for all Norfolk residents will be needed to begin to overcome NIMBY pressure.

3. Lack of Resources

The runaway growth of the real estate market in recent years has left many residents without the means to afford decent accommodations. This growing housing demand means public agencies, including City of Norfolk departments, often lack sufficient resources to offer adequate assistance to those in need or to those trying to remedy housing problems. Chronic funding gaps in housing programs need to be closed in order to help the City and public institutions correct housing market failures.

4. Lack of Developable Area

The area of the city of Norfolk is largely built out and is surrounded on all sides by water and adjacent municipalities, leaving the City no opportunity to annex developable land. With no greenfield development opportunities, costs are relatively higher for land development to increase housing stock.

5. Transportation Access

Reliable transportation access is critical for connecting residents to jobs, education, and

services. A lack of reliable public transportation was noted during stakeholder interviews and in responses to the public survey, with the most common complaints being the number of transfers required to get from point A to point B, long bus headways, and limited service hours. Any future housing planning should include high-quality public transportation planning and vice versa.

B. 2021 Recommended Actions

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

Impediment #1: Affordable Housing				
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage	
1.1 Adopt HUD's Small Area Fair Housing Rents in more areas.	<ul style="list-style-type: none">NRHA	1 year	<ul style="list-style-type: none">NRHA – VPS (2 zip codes)	
1.2 Mitigate opportunities for for-profit LLCs to acquire multi-unit properties at the end of their affordability period.	<p>Partnerships between:</p> <ul style="list-style-type: none">Dept. of Housing and Community Development,NRHA andNon-profit/mission driven developers	2-5 years	<ul style="list-style-type: none">See Virginia Community Capital (VCC) pilot programs in capital region about affordable housing loan fund.	
1.3 Increase marketing and TA to small developers that can build missing middle housing.	<ul style="list-style-type: none">Dept. of Housing and Community Development,Local homebuilder association/trade groups	1 year	<ul style="list-style-type: none">Missing Middle Playbook (plans and designs)	
1.4 Explore new funding sources such as local bonds and tax credits that could be used to incentivize more production of affordable housing.	<ul style="list-style-type: none">Dept. of Housing and Community Development,NRHA	2-5 years		
1.5 Continue to advocate for an Inclusionary Zoning Policy.	<ul style="list-style-type: none">Dept. of Planning	1-3 years	<ul style="list-style-type: none">St. Paul's Area Transformation project, Citizen's Advisory	

		<ul style="list-style-type: none"> Dept. of Housing and Community Development 		Committee, Planning Department multifamily design guidelines
1.6	Design policies and programs that strongly incentivize placement of new affordable housing units in high opportunity areas.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, NRHA 	1-3 years	<ul style="list-style-type: none"> City lot disposition through auction
1.7	Create citywide definition of "affordable" to align future goals and actions with community values.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, Dept. of Neighborhood Services Local disability advocacy groups 	6 months-1 year	<ul style="list-style-type: none"> 2016 Housing Study update

Impediment #2: Housing Quality				
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage	
2.1 Create a rehab program open to landlord or owner-occupied applicants that provides tax incentives and/or subsidy to upgrade homes in exchange for a covenant that guarantees affordability for 5 years minimum.	<ul style="list-style-type: none"> Dept. of Housing and Community Development NRHA Real Estate Assessor 	1-2 years	<ul style="list-style-type: none"> Renovate Norfolk (single-family, owner-occupied units) Strengthening Neighborhoods (owner-occupied and rental rehab in target areas) Tax Abatement Program (Assessor's office) 	
2.2 Publish a building standard guide for developers and landlords for rehab and new construction. Include basic accessibility standards, stormwater management best practices and energy efficiency upgrades.	Collaboration between: <ul style="list-style-type: none"> Dept. of Housing and Community Development, Dept. of Planning, Dept. of Safety and Permits 	6 months-1 year		
2.3 Implement effective code enforcement programs and widely	<ul style="list-style-type: none"> Dept. of Housing and Community Development, 	1-2 years	<ul style="list-style-type: none"> Home Maintenance Course 	

	<p>publish standards for homeowners.</p>	<ul style="list-style-type: none">• Dept. of Planning,• Dept. of Safety and Permits• Neighborhood Services		
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Impediment #3: Diversity of Housing Types				
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage	
3.1 Market existing technical assistance documents more aggressively. Consider events/presentations to home builder associations, trade associations, small developer forums.	<ul style="list-style-type: none">• Department of Planning,• Dept. of Safety and Permits,• Dept. of Housing and Community Development	6 months-1 year	<ul style="list-style-type: none">• Missing Middle Playbook• Narrow Lot House Plans	
3.2 Develop additional technical assistance to small developers about developing small properties.	<ul style="list-style-type: none">• Department of Planning,• Dept. of Safety and Permits	1-2 years	<ul style="list-style-type: none">• Missing Middle Playbook• Narrow Lot House Plans	
3.3 Emphasize and market a campaign to increase large household landlord participation in HCV programs.	<ul style="list-style-type: none">• Dept. of Housing and Community Development,• NRHA	1-2 years	<ul style="list-style-type: none">• Large Household Landlord Incentive Program	
3.4 Continue to examine the appropriateness of single-family zoning and its ability to absorb housing demand.	<ul style="list-style-type: none">• Dept. of Housing and Community Development,• Dept. of Planning	1-3 years	<ul style="list-style-type: none">• Comprehensive Plan• Vision 2100	
3.5 Review prohibitions on permanent and semi-permanent manufactured housing in residential base zoning districts, analyzing housing affordability impacts.	<ul style="list-style-type: none">• Dept. of Planning,• Dept. of Housing and Community Development	1-3 years	<ul style="list-style-type: none">• Comprehensive Plan• Zoning Code• Missing Middle Playbook• Vision 2100	

Impediment #4: Accessible Housing			
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage
4.1 Design grant programs for landlord or tenant applicants to apply for accessibility upgrades.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, Landlord associations 	1-2 years	<ul style="list-style-type: none"> Renovate Norfolk (prioritizing elderly populations and persons with disabilities)
4.2 Assess the current accessible housing stock and identify best practices for or examples of design of accessible units.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, Dept. of Neighborhood Services Local disability advocacy groups 	6 months-1 year	<ul style="list-style-type: none"> 2016 Housing Study update
4.3 Publish and promote a building standard guide as technical assistance that is specific to basic accessibility standards by requirement and by best practice.	Collaboration between: <ul style="list-style-type: none"> Dept. of Housing and Community Development, Dept. of Planning, Dept. of Safety and Permits Local disability advocacy groups 	1-2 years	<ul style="list-style-type: none"> Virginia Construction Code, Chapter 11
4.4 Offer developer incentives for projects that include units built according to universal design principles.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, Dept. of Planning 	2-3 years	
4.5 Examine the zoning ordinance to ensure that there is an adequate method for reasonable accommodation requests.	<ul style="list-style-type: none"> Dept. of Planning 	6 months-1 year	<ul style="list-style-type: none"> Comprehensive Plan

Impediment #5: Home Lending Disparities			
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage
5.1 Charge an existing city agency with the role to act as liaison between financial institutions and housing advocates.	<ul style="list-style-type: none"> City Manager's Office 	1-2 years	
5.2 Encourage lenders to reinvest in areas with	<ul style="list-style-type: none"> Based on recommendation 5.1 	2-3 years	

	majority-minority populations. Together or separate, also encourage lending institutions to include FHA loans in their portfolio and market more aggressively.			
5.3	Encourage more lending institutions to include FHA loans in their portfolio and market more aggressively.	<ul style="list-style-type: none"> Based on recommendation 5.1 	2-3 years	
5.4	Publicly praise or otherwise recognize financial institutions with a record of supporting fair housing initiatives.	<ul style="list-style-type: none"> City Manager's Office Dept. of Housing and Community Development 	2-3 years	

Impediment #6: Eviction Rates				
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage	
6.1 Assess and report out on the impacts of recent programs that intended to help stem evictions to help guide decision making and support future grant requests.	<ul style="list-style-type: none"> Dept. of Housing and Community Development Dept. of Neighborhood Services 	6 months	<ul style="list-style-type: none"> Eviction Diversion and Support program Eviction clinics Eviction Action Plan 	
6.2 Based on assessment above, consider funding for experienced partners to improve design to continue to achieve desired goals.	<ul style="list-style-type: none"> Dept. of Housing and Community Development Dept. of Neighborhood Services Local non-profit partners that have experience in supportive services that address eviction vulnerabilities 	1 year	<ul style="list-style-type: none"> Eviction Diversion and Support program Rent Ready Norfolk 	
6.3 Develop pathways to address evictions within the judicial system through a	<ul style="list-style-type: none"> Dept. of Neighborhood Services 	2-5 years	<ul style="list-style-type: none"> Eviction Action Plan 	

	housing court and enhanced mediation services.			
6.4	Develop a communications plan to support enhanced education and training as it relates to eviction prevention.	<ul style="list-style-type: none"> Dept. of Neighborhood Services 	1-2 years	<ul style="list-style-type: none"> Eviction Action Plan Renting Smart Academy (RRN)
6.5	Advocate for changes to policies that currently enable easy eviction filings, such as low filing costs.	<ul style="list-style-type: none"> Dept. of Neighborhood Services Dept. of Housing and Community Development 	2-5 years	<ul style="list-style-type: none"> Eviction Action Plan

Impediment #7: Environmental Health (Internal Hazards) and Climate Justice (External Hazards)				
Recommendation	Responsible Agency	Timeframe	Policy/Program Leverage	
7.1 Launch a rehab program open to landlord or owner-occupied applicants that provides tax incentives and/or subsidy specifically to address lead-based paint mitigation.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, NRHA 	1-3 years	<ul style="list-style-type: none"> Norfolk Home Rehabilitation Program 	
7.2 Continue to, and increase when appropriate, prioritizing properties that typically provide space to children in rehab programs.	<ul style="list-style-type: none"> Dept. of Housing and Community Development, NRHA 	1-3 years	<ul style="list-style-type: none"> Renovate Norfolk (Note: priority for children under 6) 	
7.3 Develop relationship with Dept. of Public Health for notification of when a child is reported to have an elevated blood lead level.	<ul style="list-style-type: none"> Dept. of Public Health Dept. of Housing and Community Development 	1-3 years		
7.4 Create programs to incentivize contractors to become state certified lead abatement	<ul style="list-style-type: none"> Dept. of Housing and Community Development, Office of St. Paul's Transformation 	1-3 years		

	contractors. Prioritize potential DBE firms.	<ul style="list-style-type: none">Office of Economic Development		
7.5	Prioritize racial desegregation and deconcentration of poverty by focusing affordable housing development incentives outside R/ECAPs.	<ul style="list-style-type: none">Dept. of Housing and Community DevelopmentDept. of Planning	2-5 years	
7.6	Continue to build awareness of flood risks and insurance imperatives as well as incentivize a variety of options for flood mitigation at home.	<ul style="list-style-type: none">Dept. of Emergency Preparedness and ResponseOffice of ResilienceDept. of PlanningAll agencies that interact with real estate	1-5 years	<ul style="list-style-type: none">Vision 2100Retain Your RainHome Elevation Plan BookCity of Norfolk Flood Risk Center Learning CenterFlood Awareness and Mitigation Resources
7.7	NDHCD should coordinate with Dept. of Emergency Preparedness and Response to prioritize flood risk reduction actions in low-income residential areas for the Hazard Mitigation Plan.	<ul style="list-style-type: none">Dept. of Housing and Community DevelopmentDept. of Emergency Preparedness and ResponseDept. of ResilienceDept. of Public Works	1-5 years	<ul style="list-style-type: none">Home Elevation Plan Book
7.8	Reexamine zoning and development standards for multi-family housing development that encourage or require proximity to major arterial roads to deconcentrate multi-family housing away from pollution corridors.	<ul style="list-style-type: none">Dept. of Planning	1-3 years	<ul style="list-style-type: none">Vision 2100Comprehensive Plan

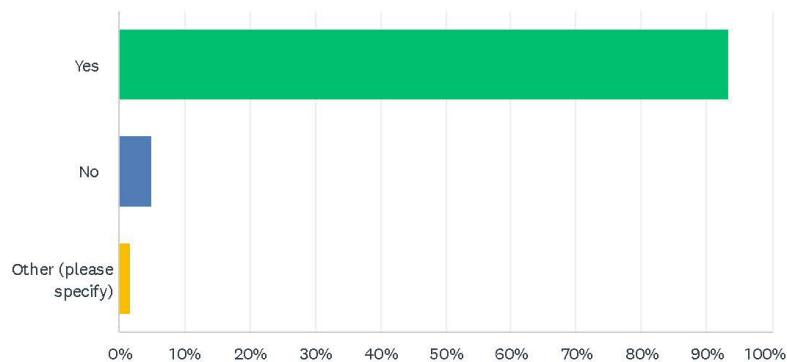
Impediment #8: Fair Housing Policy and Compliance				
Recommendation		Responsible Agency	Timeframe	Policy/Program Leverage
8.1	Provide fact sheet to public housing/subsidy beneficiaries about fair housing law and how to file a complaint.	<ul style="list-style-type: none">Dept. of Housing and Community DevelopmentDept. of Neighborhood ServicesNRHA	1 year	
8.2	Update City of Norfolk website to include a stand-alone page nested under the appropriate office to publish fair housing information and processes.	<ul style="list-style-type: none">Dept. of Housing and Community DevelopmentDept. of Neighborhood ServicesNorfolk Dept. of Communications	3-6 months	<ul style="list-style-type: none">During the draft of this report, the City is developing a new web page to address fair housing policy more directly and with more transparency.
8.3	Fund and charge experienced local organizations to provide fair housing education and testing efforts as well as periodic review and analysis of lending data.	<ul style="list-style-type: none">Dept. of Housing and Community DevelopmentDept. of Neighborhood ServicesLocal non-profit/advocacy	1 year	<ul style="list-style-type: none">Home of VA programs
8.4	Designate a City agency that can reasonably be expected to collect data on protected classes to include LGBTQ+ in their reviews.	<ul style="list-style-type: none">Dept. of Neighborhood ServicesDept. of Public Health	1 year	<ul style="list-style-type: none">

XV. Appendix A: Community Needs Survey Results

Community Fair Housing Needs Assessment

Q1 Do you live in the City of Norfolk?

Answered: 411 Skipped: 4



ANSWER CHOICES	RESPONSES
Yes	384
No	20
Other (please specify)	7
TOTAL	411

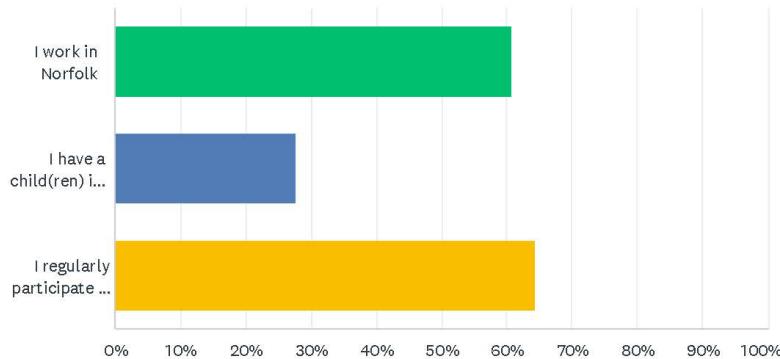
Q2 Please identify the zip code for where you live:

Answered: 407 Skipped: 8

Q3 Please check all that apply:

Answered: 362 Skipped: 53

Community Fair Housing Needs Assessment



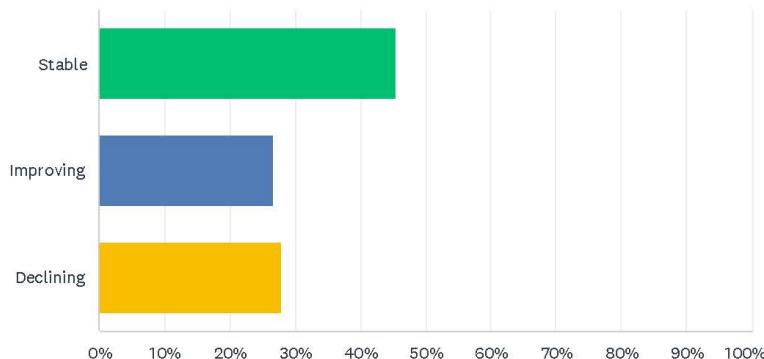
ANSWER CHOICES	RESPONSES	
I work in Norfolk	60.77%	220
I have a child(ren) in a Norfolk school or child care center	27.62%	100
I regularly participate in Norfolk recreational, cultural, or leisure activities	64.36%	233
Total Respondents: 362		

Q4 If you could change one thing in your neighborhood, what would it be?

Answered: 367 Skipped: 48

Q5 Do you think the physical condition of housing in your neighborhood is:

Answered: 375 Skipped: 40

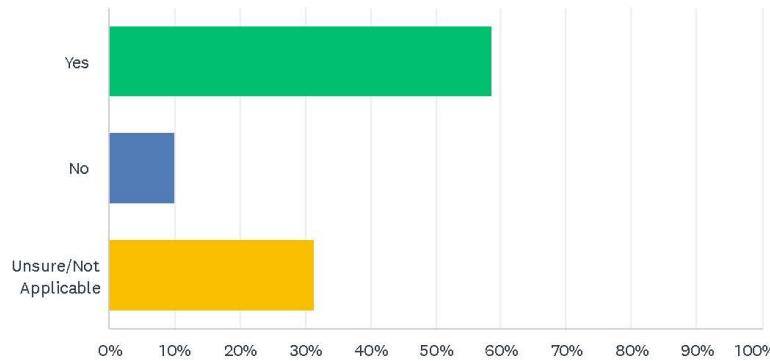


Community Fair Housing Needs Assessment

ANSWER CHOICES	RESPONSES
Stable	45.33%
Improving	26.67%
Declining	28.00%
TOTAL	375

Q6 Is displacement a critical issue in the City of Norfolk?

Answered: 379 Skipped: 36

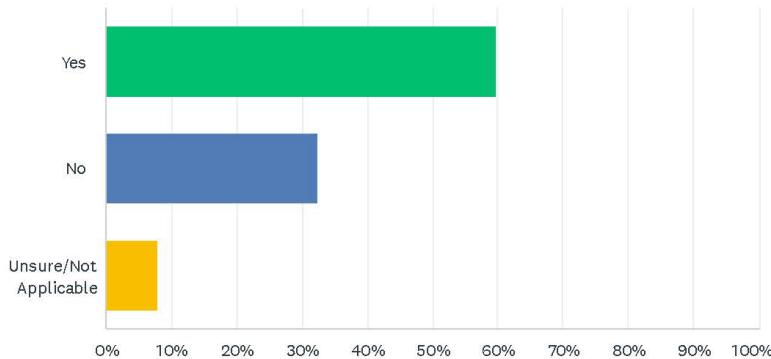


ANSWER CHOICES	RESPONSES
Yes	58.58%
No	10.03%
Unsure/Not Applicable	31.40%
TOTAL	379

Q7 Do you feel safe in your immediate neighborhood?

Answered: 370 Skipped: 45

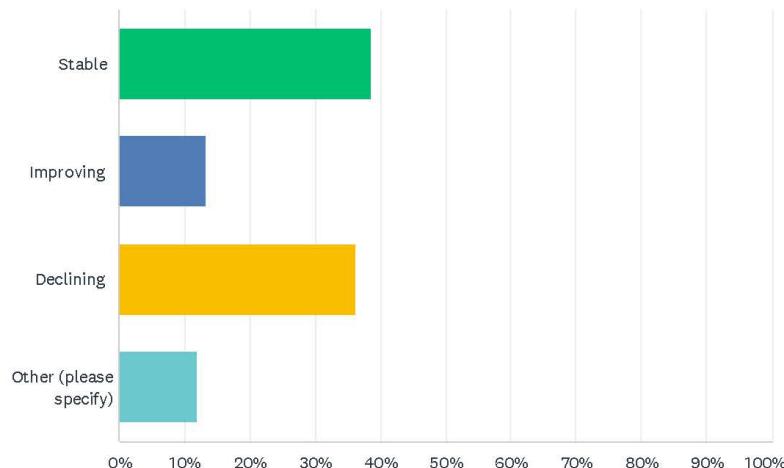
Community Fair Housing Needs Assessment



ANSWER CHOICES	RESPONSES
Yes	59.73% 221
No	32.43% 120
Unsure/Not Applicable	7.84% 29
TOTAL	370

Q8 Do you think the physical condition of the public space in your neighborhood (streets, sidewalks, parks) is:

Answered: 384 Skipped: 31

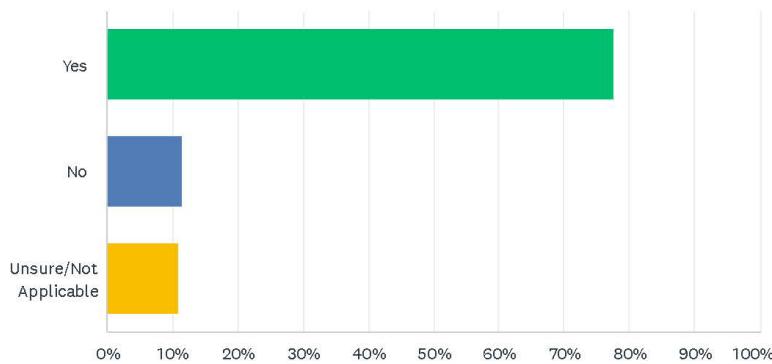


Community Fair Housing Needs Assessment

ANSWER CHOICES	RESPONSES
Stable	38.54%
Improving	13.28%
Declining	36.20%
Other (please specify)	11.98%
TOTAL	384

Q9 Is affordable housing a critical issue in the City of Norfolk?

Answered: 383 Skipped: 32

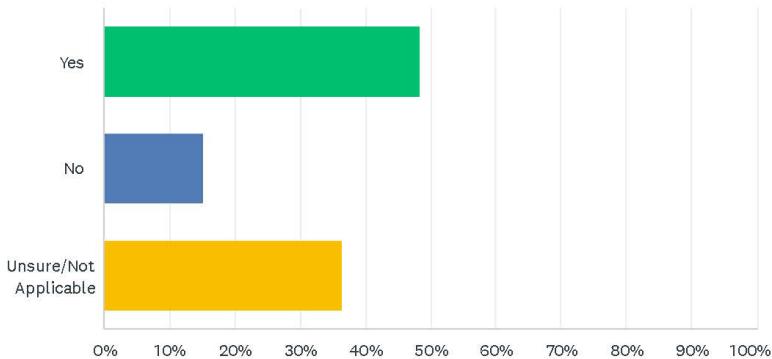


ANSWER CHOICES	RESPONSES
Yes	77.55%
No	11.49%
Unsure/Not Applicable	10.97%
TOTAL	383

Q10 Do you think evictions are a critical issue in the City of Norfolk?

Answered: 382 Skipped: 33

Community Fair Housing Needs Assessment

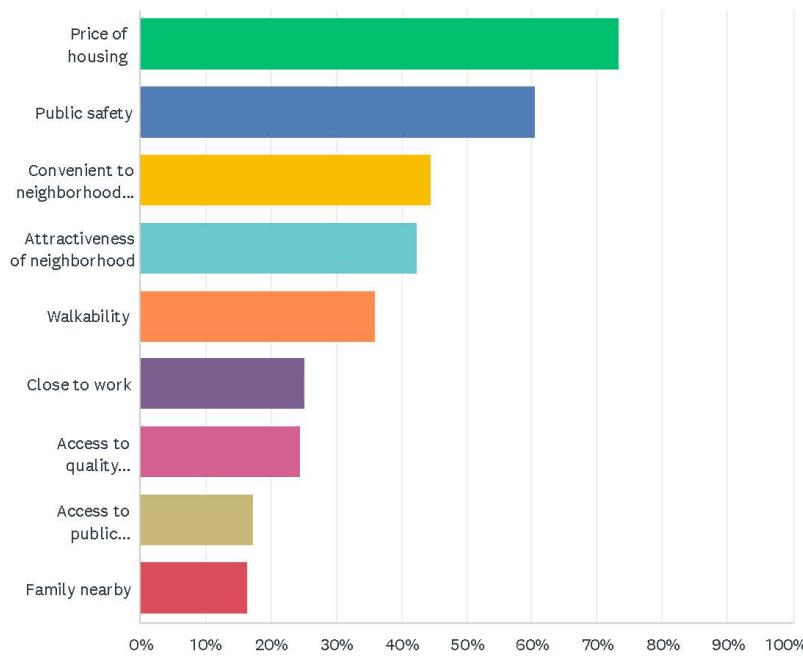


ANSWER CHOICES	RESPONSES
Yes	48.43% 185
No	15.18% 58
Unsure/Not Applicable	36.39% 139
TOTAL	382

Q11 What are the two most important considerations to you in choosing a place to live? (check all that apply)

Answered: 382 Skipped: 33

Community Fair Housing Needs Assessment

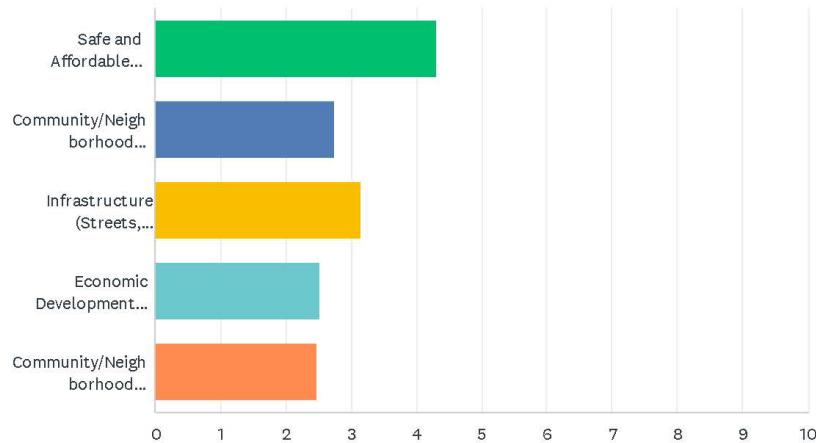


ANSWER CHOICES	RESPONSES
Price of housing	73.30% 280
Public safety	60.47% 231
Convenient to neighborhood amenities (parks, restaurants, libraries, etc.)	44.50% 170
Attractiveness of neighborhood	42.41% 162
Walkability	36.13% 138
Close to work	25.13% 96
Access to quality schools/youth services	24.61% 94
Access to public transportation	17.28% 66
Family nearby	16.49% 63
Total Respondents: 382	

Q12 Please rank the following types of community development in the city in order of need from 1 to 5, where 1 is most needed and 5 is least needed:

Answered: 352 Skipped: 63

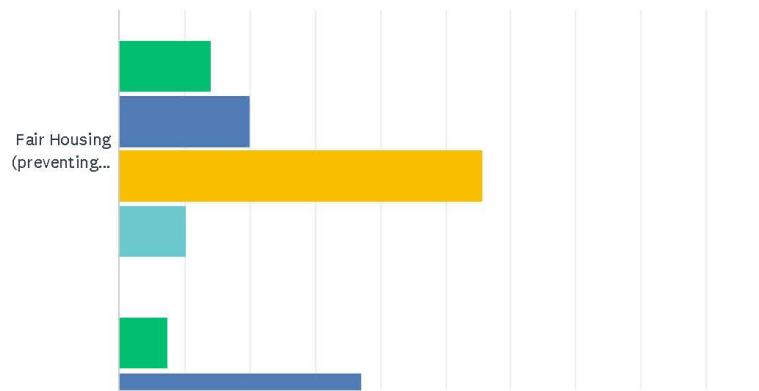
Community Fair Housing Needs Assessment



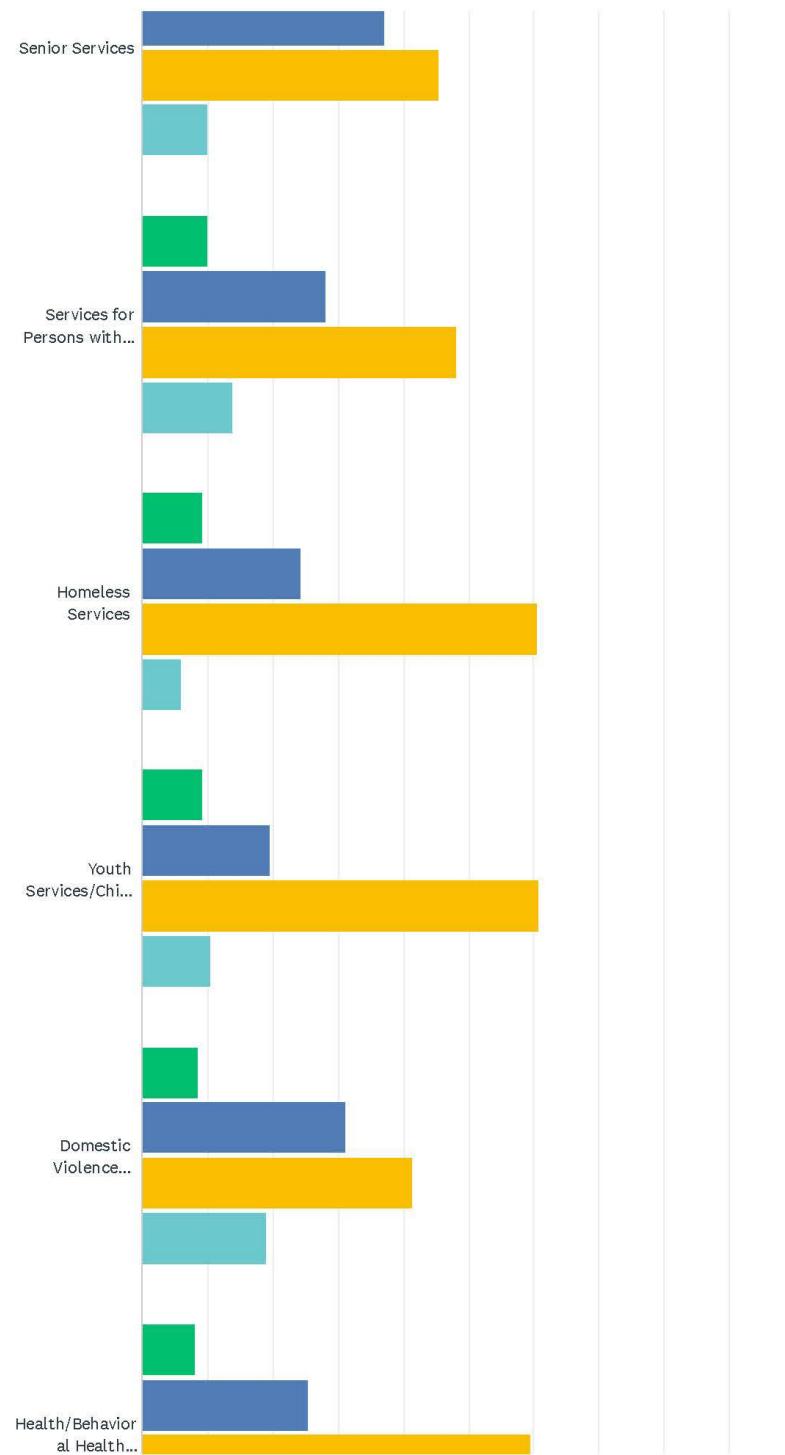
	1	2	3	4	5	TOTAL	SCORE
Safe and Affordable Housing	66.77% 223	12.87% 43	8.38% 28	7.19% 24	4.79% 16	334	4.30
Community/Neighborhood Services	6.67% 22	23.64% 78	26.97% 89	24.24% 80	18.48% 61	330	2.76
Infrastructure (Streets, Sidewalks, Parks)	15.76% 52	30.00% 99	21.21% 70	19.09% 63	13.94% 46	330	3.15
Economic Development (Job Training, Workforce Development, etc.)	8.55% 29	17.11% 58	21.53% 73	22.12% 75	30.68% 104	339	2.51
Community/Neighborhood Facilities (Parks, Recreation Facilities, Community Centers, etc.)	6.40% 22	17.73% 61	21.80% 75	25.29% 87	28.78% 99	344	2.48

Q13 Please rank the level of need for the following types of public services in the city:

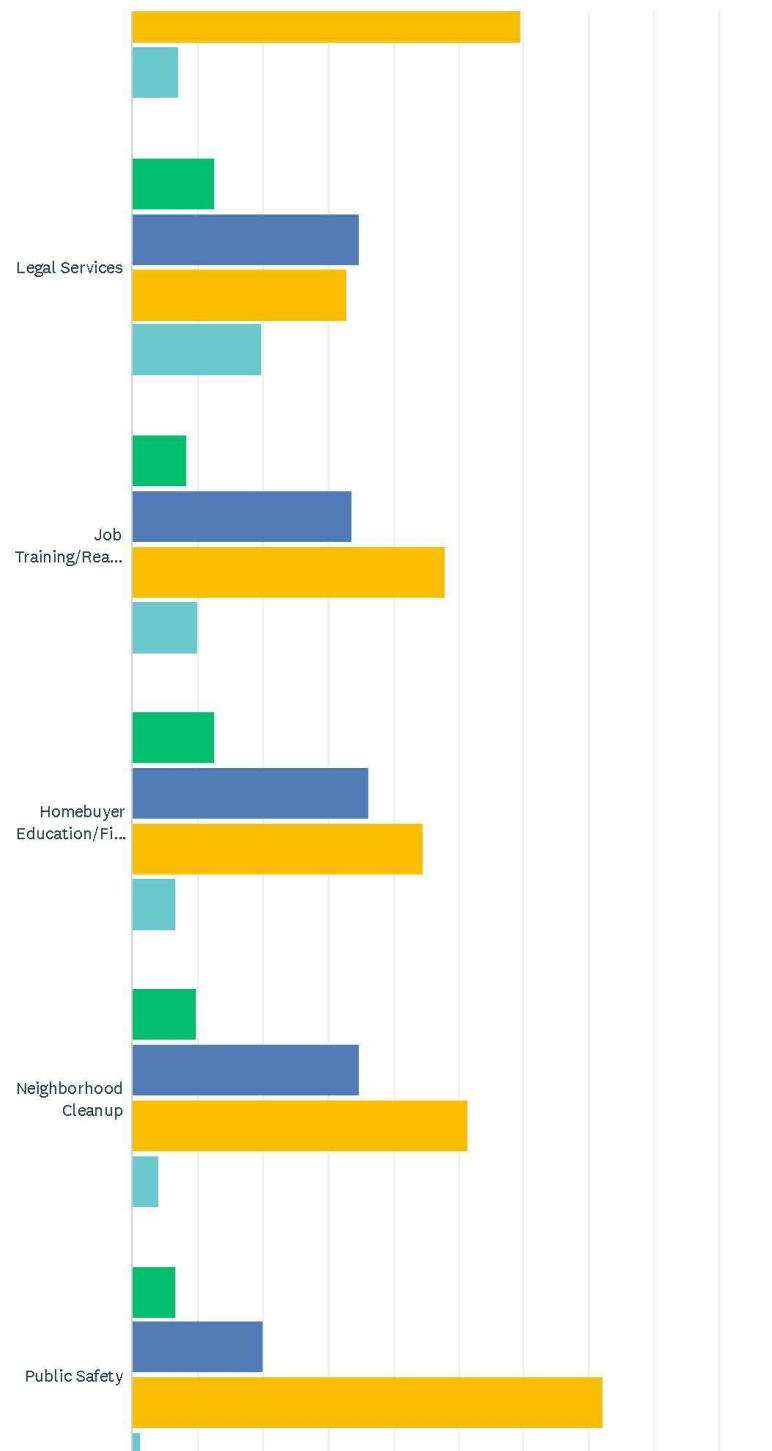
Answered: 348 Skipped: 67



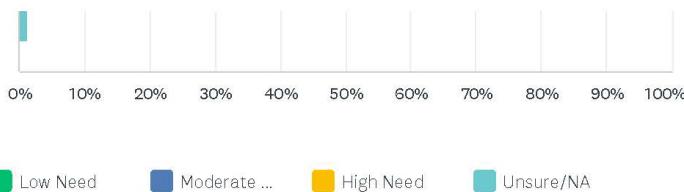
Community Fair Housing Needs Assessment



Community Fair Housing Needs Assessment



Community Fair Housing Needs Assessment

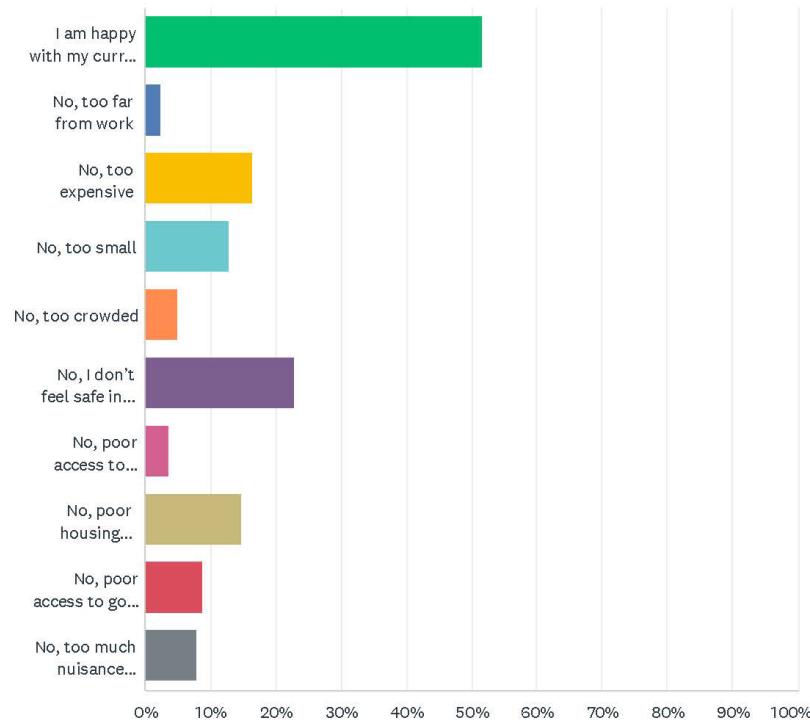


	LOW NEED	MODERATE NEED	HIGH NEED	UNSURE/NA	TOTAL	WEIGHTED AVERAGE
Fair Housing (preventing discrimination in housing based on race, national origin, disability, etc.)	14.10% 33	20.09% 47	55.56% 130	10.26% 24	234	2.21
Senior Services	7.50% 15	37.00% 74	45.50% 91	10.00% 20	200	2.18
Services for Persons with Disabilities	10.05% 19	28.04% 53	48.15% 91	13.76% 26	189	2.11
Homeless Services	9.09% 18	24.24% 48	60.61% 120	6.06% 12	198	2.39
Youth Services/Child Care	9.25% 16	19.65% 34	60.69% 105	10.40% 18	173	2.31
Domestic Violence Services	8.54% 14	31.10% 51	41.46% 68	18.90% 31	164	1.95
Health/Behavioral Health Services	8.09% 14	25.43% 44	59.54% 103	6.94% 12	173	2.38
Legal Services	12.57% 21	34.73% 58	32.93% 55	19.76% 33	167	1.81
Job Training/Readiness Programs	8.28% 14	33.73% 57	47.93% 81	10.06% 17	169	2.20
Homebuyer Education/Financial Literacy	12.64% 23	36.26% 66	44.51% 81	6.59% 12	182	2.19
Neighborhood Cleanup	9.84% 19	34.72% 67	51.30% 99	4.15% 8	193	2.33
Public Safety	6.55% 15	20.09% 46	72.05% 165	1.31% 3	229	2.63

Q14 Are you satisfied with your current living situation? If no, what is the primary reason you are not?

Answered: 328 Skipped: 87

Community Fair Housing Needs Assessment



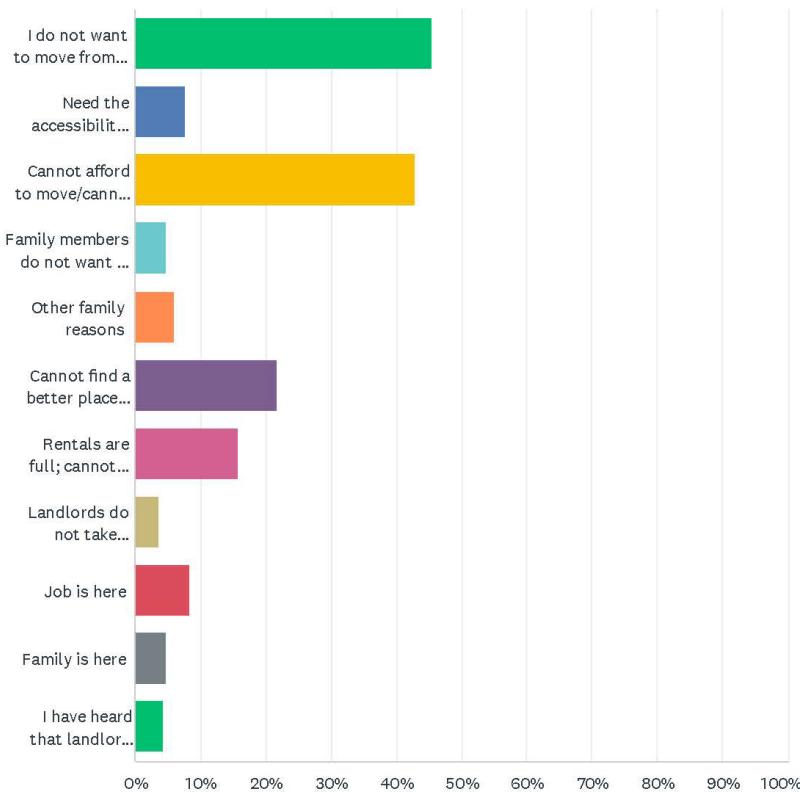
ANSWER CHOICES	RESPONSES
I am happy with my current living situation	51.52% 169
No, too far from work	2.44% 8
No, too expensive	16.46% 54
No, too small	12.80% 42
No, too crowded	4.88% 16
No, I don't feel safe in the neighborhood	22.87% 75
No, poor access to public transportation	3.66% 12
No, poor housing condition	14.63% 48
No, poor access to good schools or other neighborhood amenities	8.84% 29
No, too much nuisance flooding	7.93% 26
Total Respondents: 328	

Q15 Would you like to move from your current home or apartment? If yes, what are the three main reasons you have not moved yet. (pick up to

Community Fair Housing Needs Assessment

three)

Answered: 322 Skipped: 93



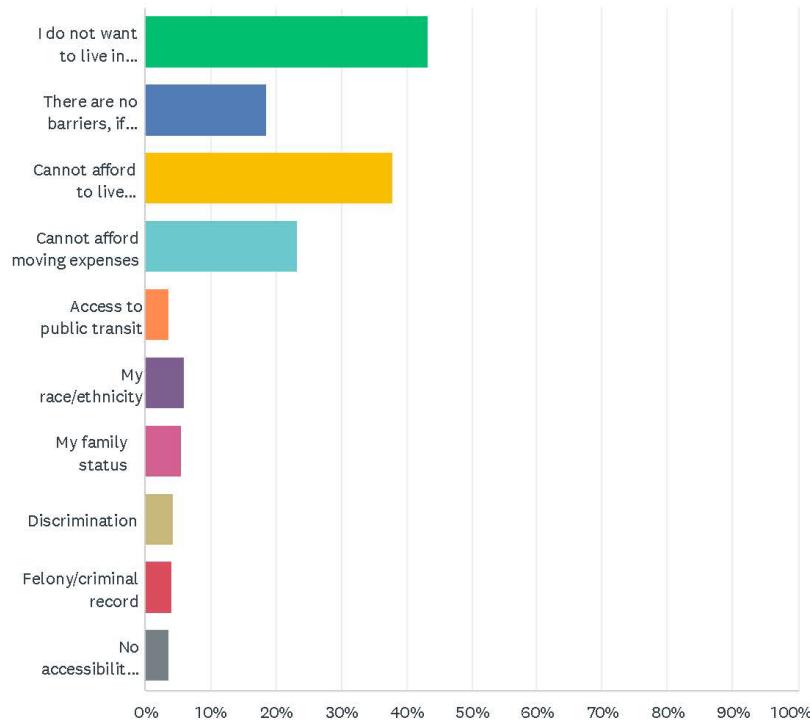
Community Fair Housing Needs Assessment

ANSWER CHOICES	RESPONSES	
I do not want to move from my current home/apartment	45.34%	146
Need the accessibility features of my current housing unit	7.76%	25
Cannot afford to move/cannot afford to live anywhere else	42.86%	138
Family members do not want to move	4.66%	15
Other family reasons	5.90%	19
Cannot find a better place to live	21.74%	70
Rentals are full; cannot find a place to rent	15.84%	51
Landlords do not take Section 8	3.73%	12
Job is here	8.39%	27
Family is here	4.66%	15
I have heard that landlords are evicting a lot of tenants in other buildings/complexes	4.35%	14
Total Respondents: 322		

**Q16 What barriers, if any, keep you from living in another part of Norfolk
(check all that apply)?**

Answered: 324 Skipped: 91

Community Fair Housing Needs Assessment

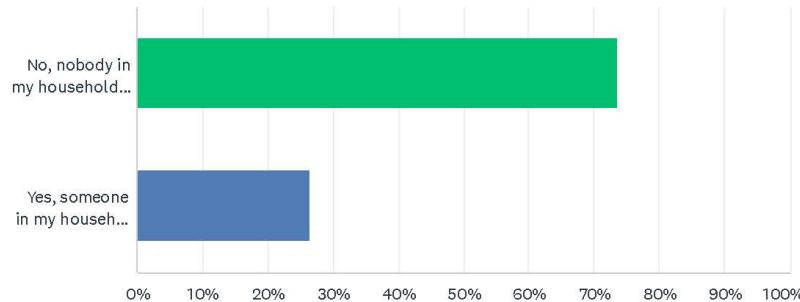


ANSWER CHOICES	RESPONSES
I do not want to live in another part of Norfolk	43.21% 140
There are no barriers, if I wanted to move, I could	18.52% 60
Cannot afford to live anywhere else	37.96% 123
Cannot afford moving expenses	23.15% 75
Access to public transit	3.70% 12
My race/ethnicity	5.86% 19
My family status	5.56% 18
Discrimination	4.32% 14
Felony/criminal record	4.01% 13
No accessibility/handicapped accessible housing elsewhere	3.70% 12
Total Respondents: 324	

Q17 Do you or someone in your household have a disability of any type? If yes, please move on to question 18, if no, please move on to question 19.

Community Fair Housing Needs Assessment

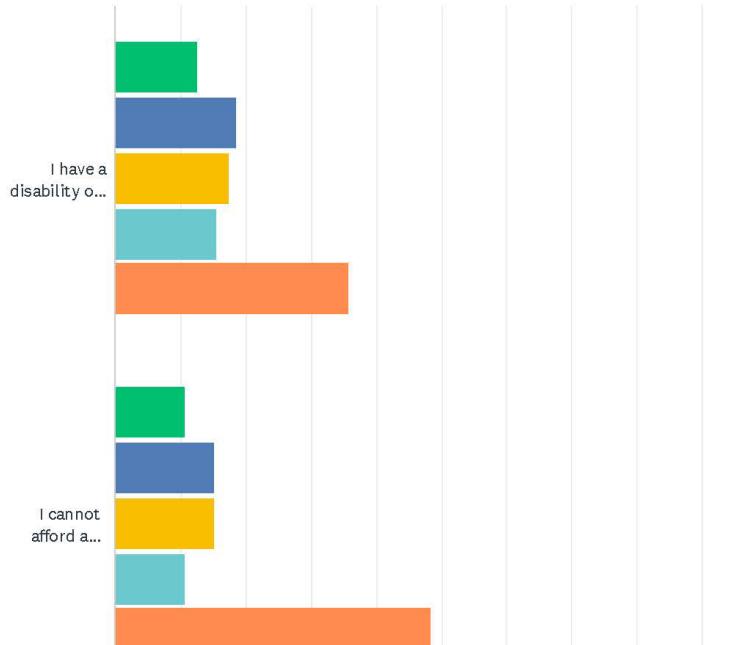
Answered: 322 Skipped: 93



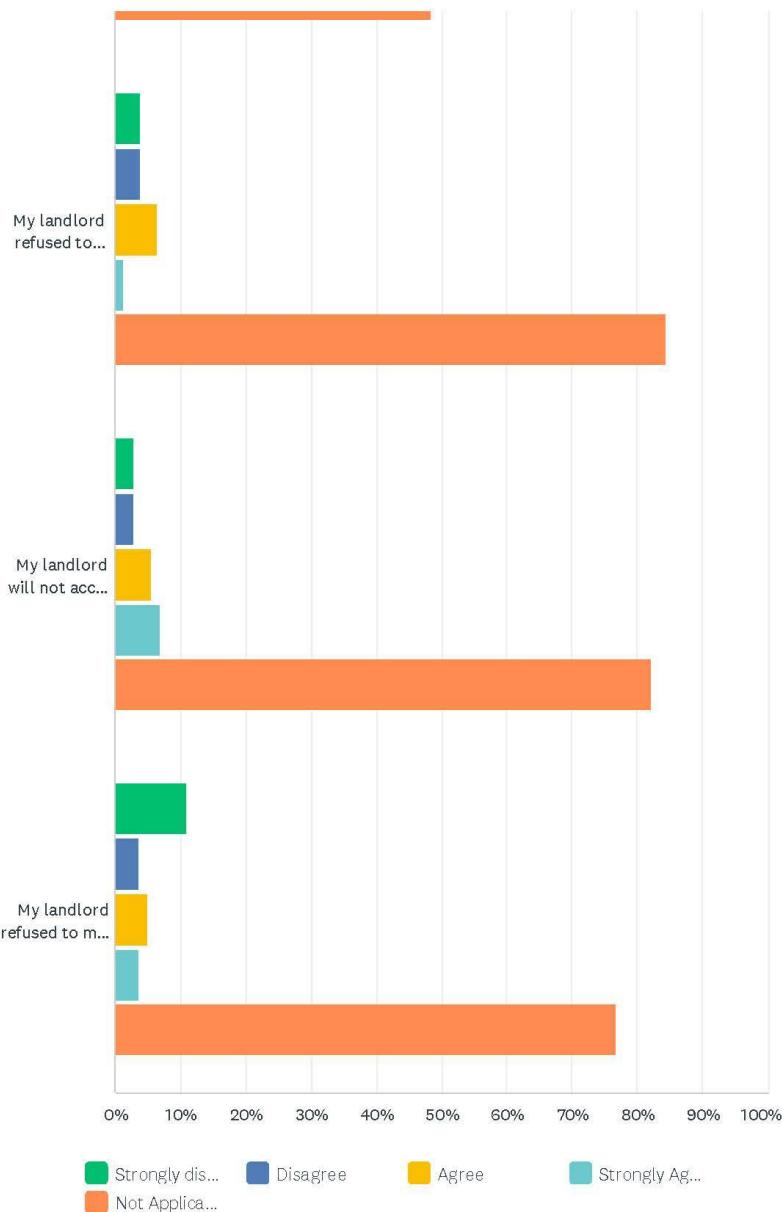
ANSWER CHOICES	RESPONSES	
No, nobody in my household has a disability of any type	73.60%	237
Yes, someone in my household has a disability	26.40%	85
TOTAL		322

Q18 If you responded yes in Question 17, please rate your level of agreement with the following statements:

Answered: 128 Skipped: 287



Community Fair Housing Needs Assessment



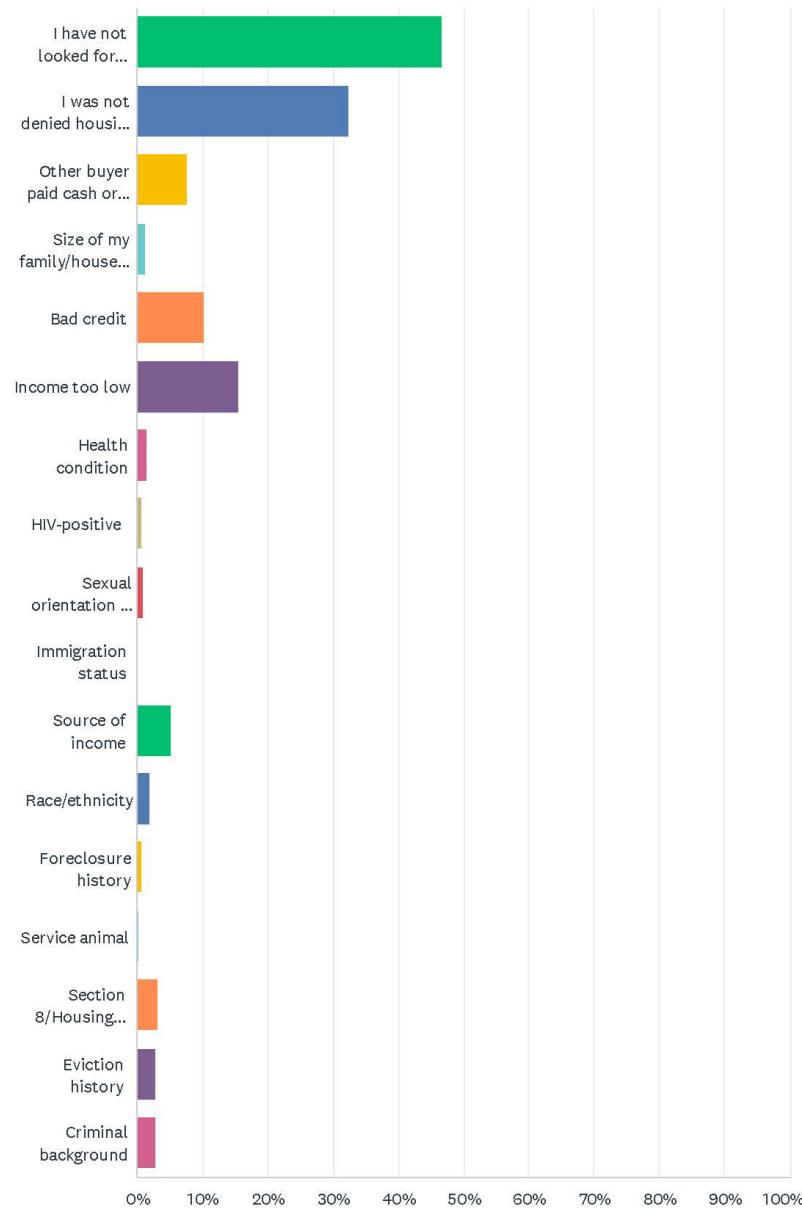
Community Fair Housing Needs Assessment

	STRONGLY DISAGREE	DISAGREE	AGREE	STRONGLY AGREE	NOT APPLICABLE	TOTAL	WEIGHTED AVERAGE
I have a disability or a household member has a disability and cannot get around my neighborhood because of broken sidewalks/no sidewalks/poor street lighting.	12.62% 13	18.45% 19	17.48% 18	15.53% 16	35.92% 37	103	1.64
I cannot afford a housing unit that has accessibility/handicapped features (e.g. grab bars, ramps, handicapped parking).	10.75% 10	15.05% 14	15.05% 14	10.75% 10	48.39% 45	93	1.29
My landlord refused to accept a service animal.	3.90% 3	3.90% 3	6.49% 5	1.30% 1	84.42% 65	77	0.36
My landlord will not accept emotional support animal	2.74% 2	2.74% 2	5.48% 4	6.85% 5	82.19% 60	73	0.52
My landlord refused to make an accommodation for me or my household member's disability.	10.98% 9	3.66% 3	4.88% 4	3.66% 3	76.83% 63	82	0.48

Q19 When you looked for housing to rent or buy in Norfolk in the past five years, were you ever denied housing to rent or buy? If yes, why (check all that apply)?

Answered: 315 Skipped: 100

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ANSWER CHOICES	RESPONSES
I have not looked for housing to rent or buy in the past five years	46.67% 147
I was not denied housing to rent or buy	32.38% 102
Other buyer paid cash or a higher price	7.62% 24
Size of my family/household	1.27% 4
Bad credit	10.16% 32
Income too low	15.56% 49
Health condition	1.59% 5
HIV-positive	0.63% 2
Sexual orientation or gender identity	0.95% 3
Immigration status	0.00% 0
Source of income	5.08% 16
Race/ethnicity	1.90% 6
Foreclosure history	0.63% 2
Service animal	0.32% 1
Section 8/Housing Choice Voucher	3.17% 10
Eviction history	2.86% 9
Criminal background	2.86% 9
Total Respondents: 315	

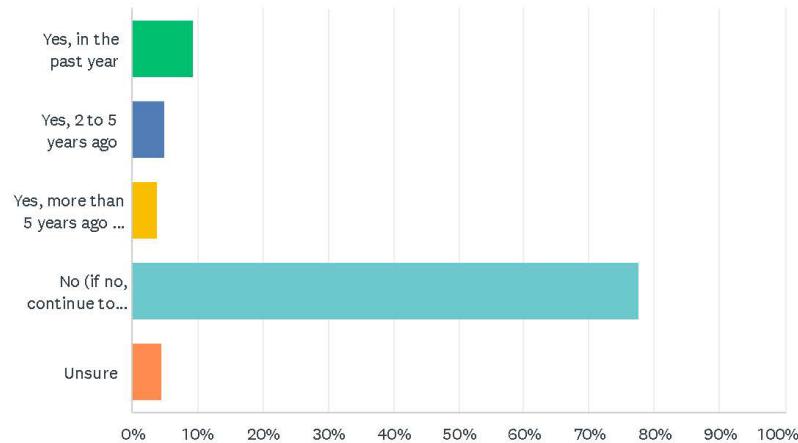
Q20 Please specify the neighborhood where you looked for housing, but were denied?

Answered: 84 Skipped: 331

Q21 Have you ever felt you were discriminated against when looking for housing in Norfolk?

Answered: 312 Skipped: 103

Community Fair Housing Needs Assessment



ANSWER CHOICES	RESPONSES	
Yes, in the past year	9.29%	29
Yes, 2 to 5 years ago	4.81%	15
Yes, more than 5 years ago or I don't remember when	3.85%	12
No (if no, continue to question 25)	77.56%	242
Unsure	4.49%	14
TOTAL		312

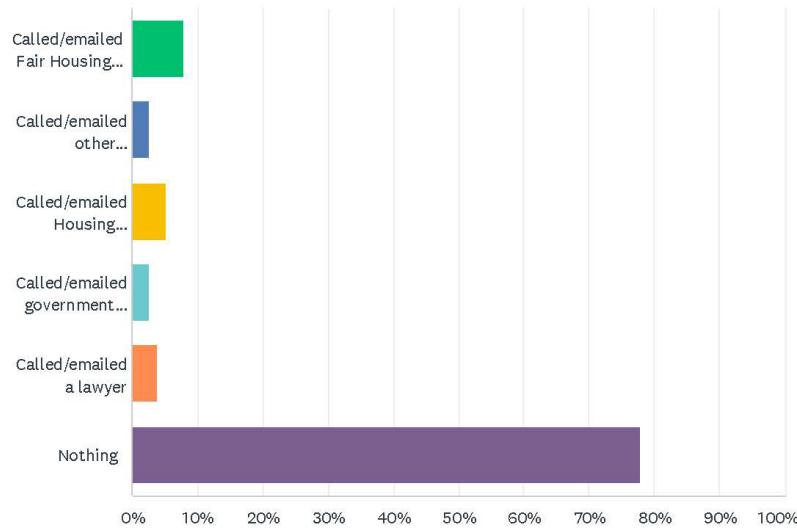
Q22 What was the reason you felt discriminated?

Answered: 60 Skipped: 355

Q23 If you felt you were discriminated against, what did you do about the discrimination (check all that apply)?

Answered: 77 Skipped: 338

Community Fair Housing Needs Assessment

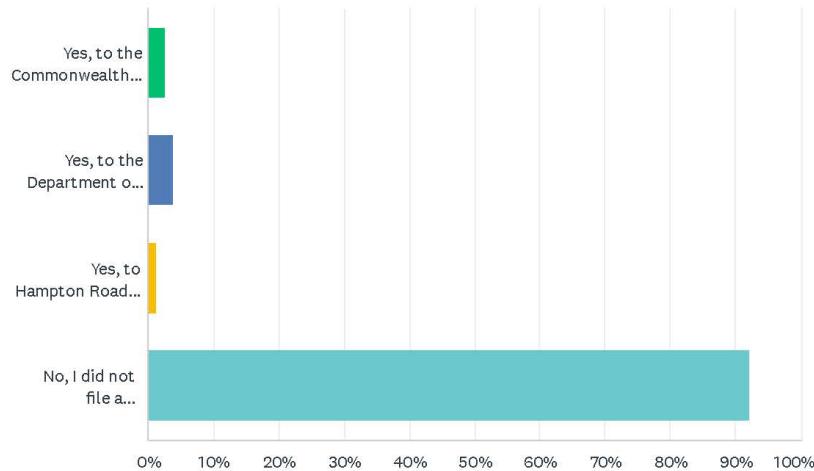


ANSWER CHOICES	RESPONSES
Called/mailed Fair Housing organization	7.79% 6
Called/mailed other organization	2.60% 2
Called/mailed Housing Authority	5.19% 4
Called/mailed government agency	2.60% 2
Called/mailed a lawyer	3.90% 3
Nothing	77.92% 60
TOTAL	77

Q24 Did you file a complaint after you were discriminated against (check all that apply)?

Answered: 77 Skipped: 338

Community Fair Housing Needs Assessment



ANSWER CHOICES	RESPONSES	
Yes, to the Commonwealth of Virginia	2.60%	2
Yes, to the Department of Housing and Urban Development (HUD)	3.90%	3
Yes, to Hampton Roads Fair Housing	1.30%	1
No, I did not file a compliant	92.21%	71
TOTAL		77

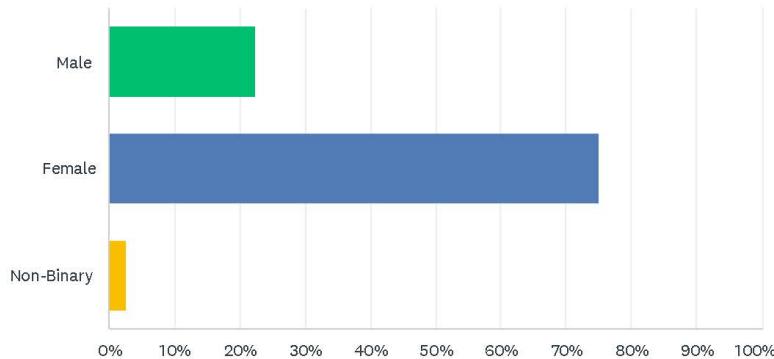
Q25 If you filed a complaint, please describe if the complaint was resolved, how long it took to be resolved, and if you were satisfied with the outcome.

Answered: 27 Skipped: 388

Q26 What is your gender?

Answered: 314 Skipped: 101

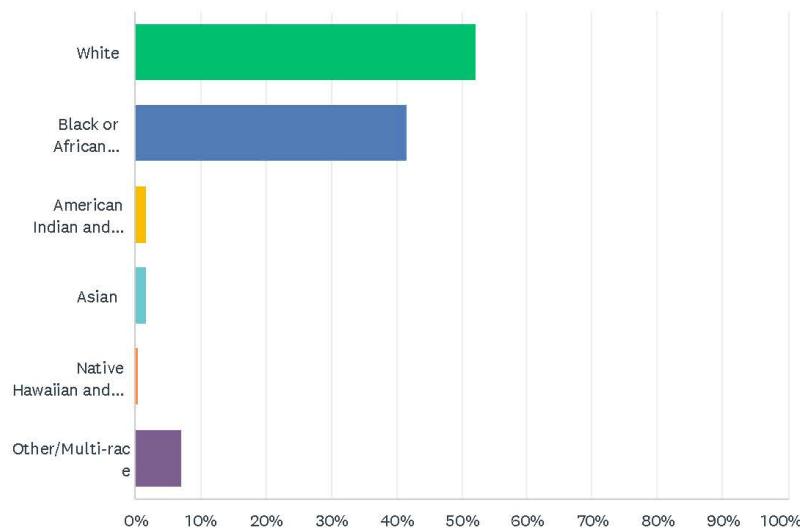
Community Fair Housing Needs Assessment



ANSWER CHOICES	RESPONSES
Male	22.29%
Female	75.16%
Non-Binary	2.55%
TOTAL	314

Q27 Please provide your race (check all that apply):

Answered: 310 Skipped: 105

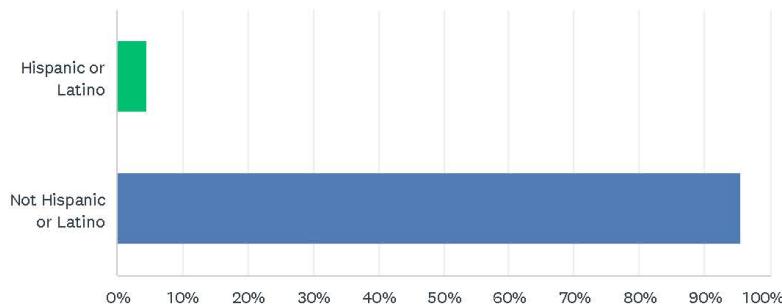


Community Fair Housing Needs Assessment

ANSWER CHOICES	RESPONSES
White	52.26% 162
Black or African American	41.61% 129
American Indian and Alaska Native	1.61% 5
Asian	1.61% 5
Native Hawaiian and Other Pacific Islander	0.32% 1
Other/Multi-race	7.10% 22
Total Respondents: 310	

Q28 Please provide your race ethnicity:

Answered: 286 Skipped: 129



ANSWER CHOICES	RESPONSES
Hispanic or Latino	4.55% 13
Not Hispanic or Latino	95.45% 273
TOTAL	286

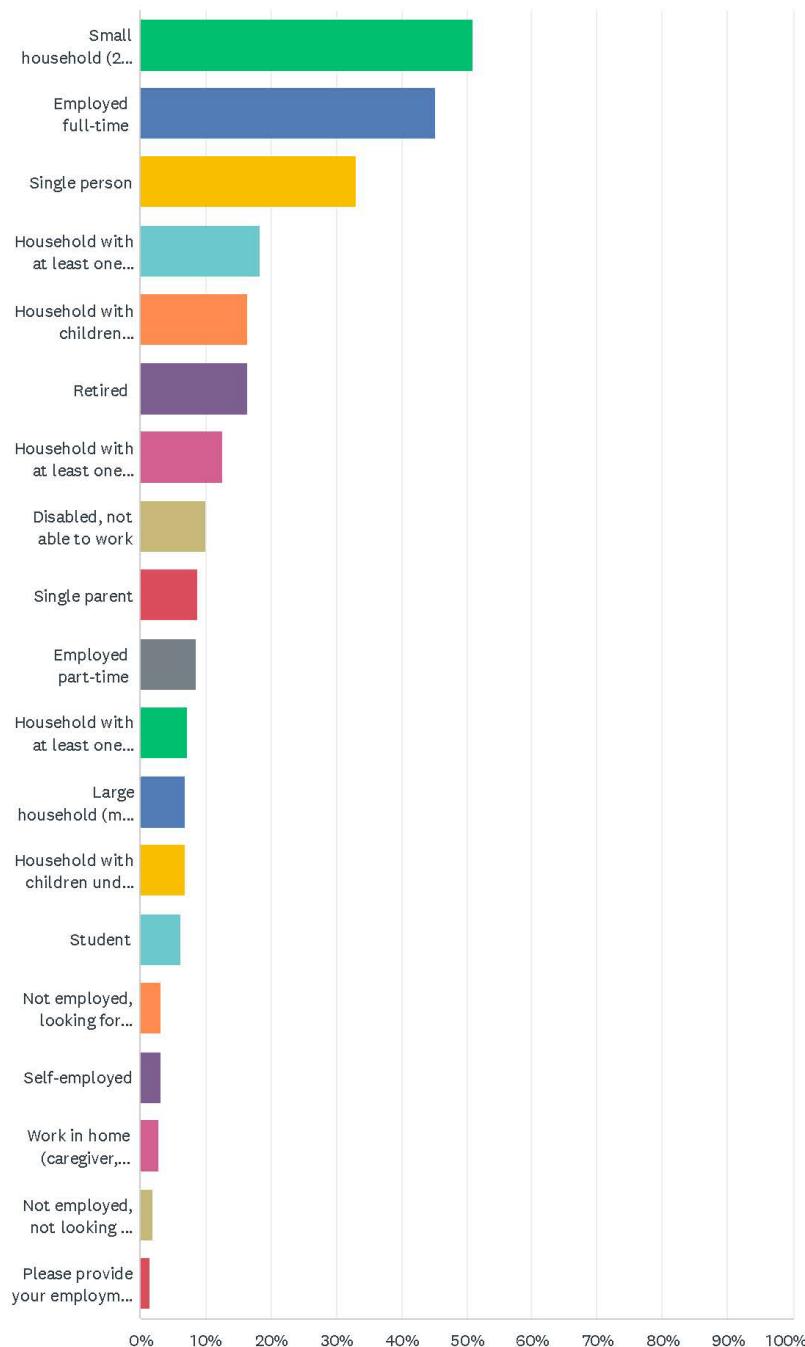
Q29 If you identify with a particular religion, please provide it here:

Answered: 92 Skipped: 323

Q30 Please describe your household (check all that apply):

Answered: 318 Skipped: 97

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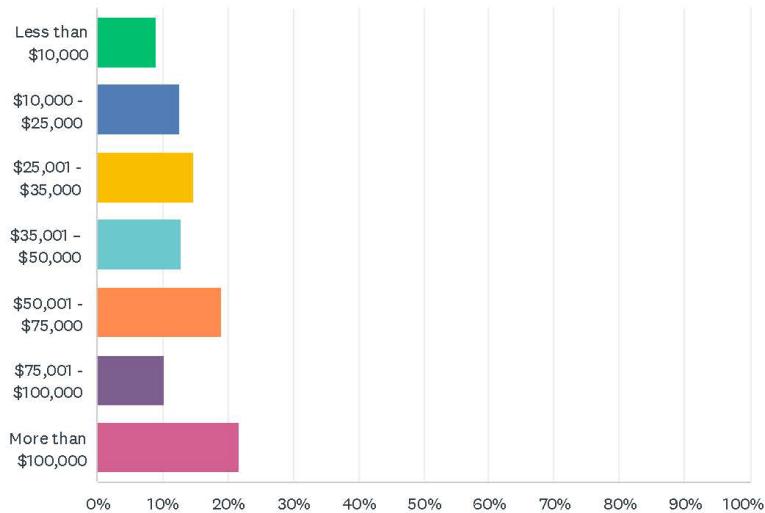
Community Fair Housing Needs Assessment

ANSWER CHOICES	RESPONSES	
Small household (2-4 people)	50.94%	162
Employed full-time	45.28%	144
Single person	33.02%	105
Household with at least one person between the ages of 62 years and 74	18.24%	58
Household with children between 6-18 years of age	16.35%	52
Retired	16.35%	52
Household with at least one person between the ages of 55 years and 61	12.58%	40
Disabled, not able to work	10.06%	32
Single parent	8.81%	28
Employed part-time	8.49%	27
Household with at least one person age 75 or older	7.23%	23
Large household (more than 4 people)	6.92%	22
Household with children under 6 years of age	6.92%	22
Student	6.29%	20
Not employed, looking for work	3.14%	10
Self-employed	3.14%	10
Work in home (caregiver, homemaker)	2.83%	9
Not employed, not looking for work	1.89%	6
Please provide your employment status (check all that apply):	1.57%	5
Total Respondents: 318		

Q31 What category does your total household income fall (include income from all sources)?

Answered: 304 Skipped: 111

Community Fair Housing Needs Assessment

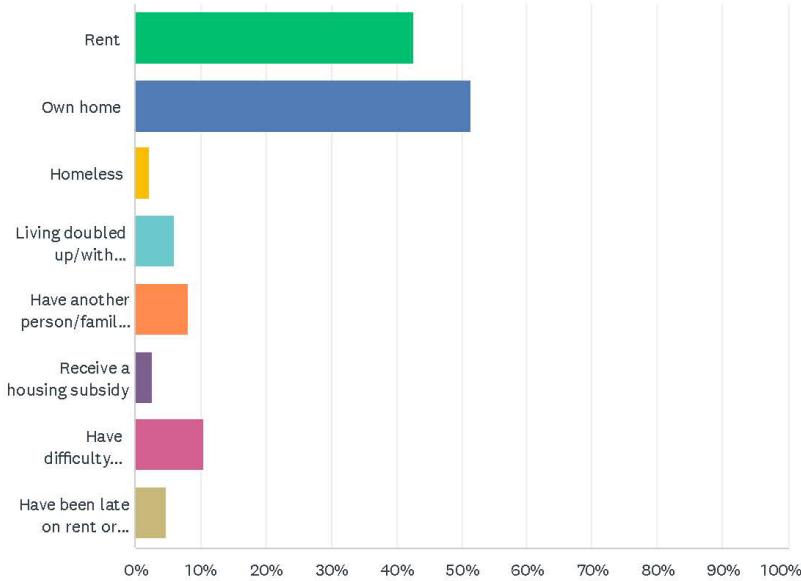


ANSWER CHOICES	RESPONSES
Less than \$10,000	8.88% 27
\$10,000 - \$25,000	12.50% 38
\$25,001 - \$35,000	14.80% 45
\$35,001 - \$50,000	12.83% 39
\$50,001 - \$75,000	19.08% 58
\$75,001 - \$100,000	10.20% 31
More than \$100,000	21.71% 66
TOTAL	304

Q32 Please provide your housing status (check all that apply):

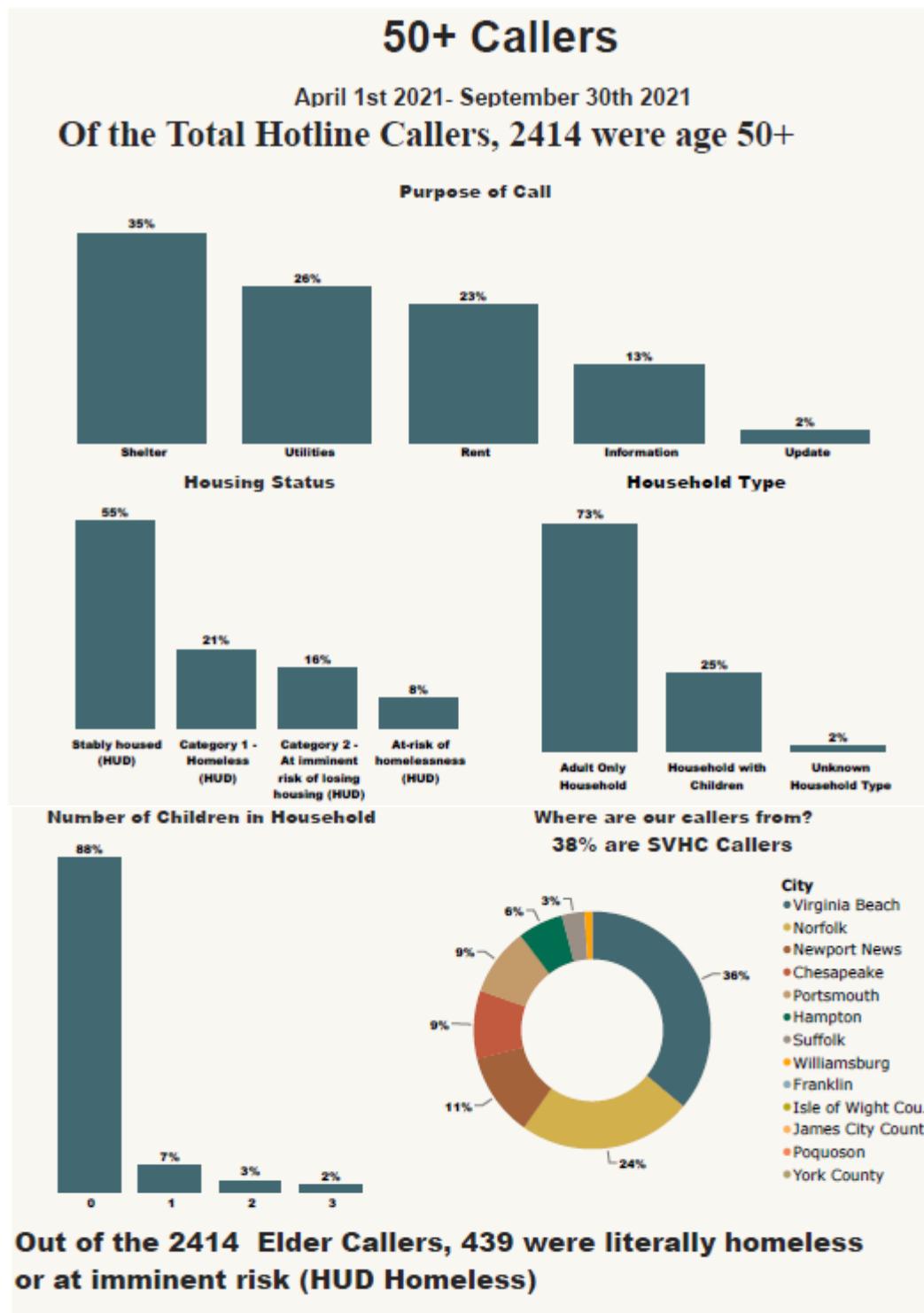
Answered: 319 Skipped: 96

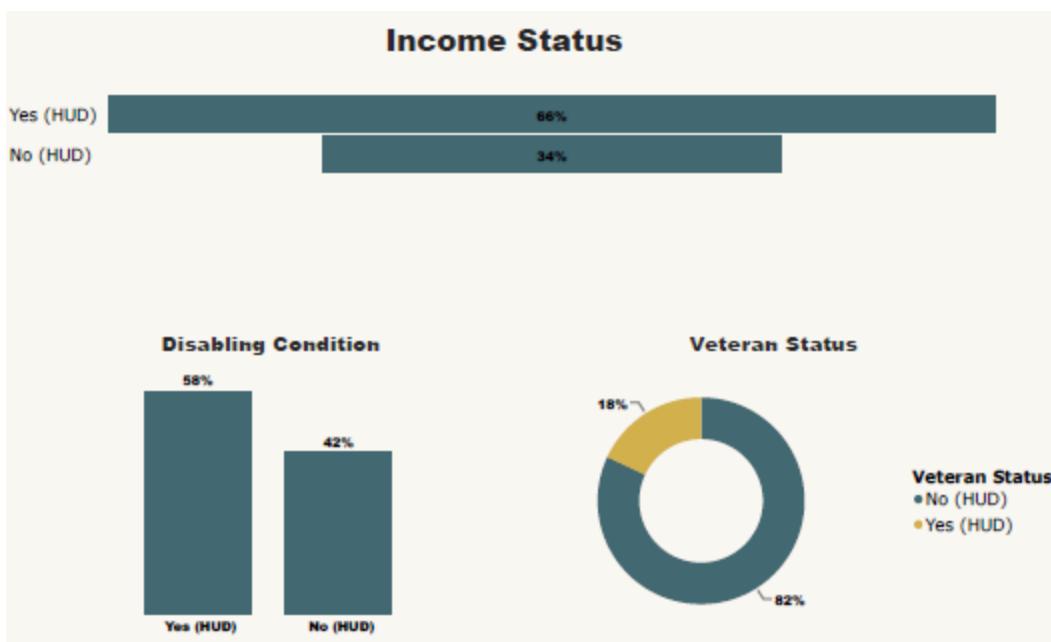
Community Fair Housing Needs Assessment



ANSWER CHOICES	RESPONSES
Rent	42.63% 136
Own home	51.41% 164
Homeless	2.19% 7
Living doubled up/with friends, family	5.96% 19
Have another person/family living in my home	8.15% 26
Receive a housing subsidy	2.51% 8
Have difficulty making monthly housing expenses	10.34% 33
Have been late on rent or mortgage payments at least twice in past six months	4.70% 15
Total Respondents: 319	

XVI. Appendix B: Senior Services of Southeastern Virginia Hotline Data





XVII. Appendix C: Public Comments

A. Public Meeting: August 4, 2022

The following questions, comments, and responses are from the public meeting held on August 4, 2022 for the 2022 Analysis of Impediments to Fair Housing. Questions and comments are presented in the order received from meeting participants and responses are from City of Norfolk staff. Comments and responses may be summarized for the purpose of this report.

Question 1: The age of seniors in the report starts at 65. Why 65 rather than 62 which is the HUD starting age for seniors, or 60 which is the age for federal funding for senior services? This difference can lead to a significant gap in services.

Response 1: The Analysis of Impediments data was driven by the Census. The 2020 Census collects data by age group and 65 was a clear delineation. These key age distinctions will be considered for future reports.

Question 2: How far is the timeline for obtaining mortgage disclosure data? Was it 5 years previous?

Response 2: The primary data source is the newest available, usually the 2020 Census data and ACS data from 2019. Comparisons were then provided where applicable, to the previous decennial census from 2010 or the American Community Survey 5-year estimate that goes back to either 2014 or 2018. Since the AI is intended to occur every five years, it takes on a point-in-time character.

Comment 3: In reference to NRHA HomeNet/Homeownership programs for down payment assistance that offers \$40,000 down payment assistance, are there any proactive programs that address crisis situations before the problems leads to foreclosure or eviction?

Response 3: The HomeNet/Homeownership center at NRHA has HUD certified counselors, as well as the UP Center and Urban League of Hampton Roads, who can address a wide range of challenges related to housing. There is a list of certified housing counselors on HUD's website. It may be that simple education is needed to let people know these resources exist. On the homeless services side, there is a regional housing crisis hotline so anybody who is about to be evicted or may not have a place to stay can call this hotline, which is managed by ForKids. The hotline staff inquire about the challenges the resident is facing and connect them with the best resource for their needs.

Comment 4: For the CDBG and ESG Grants like the one awarded to NCSB, is there a proposal or are there thoughts on other types of housing, such as tiny houses, rather than buying a hotel as innovative/creative solutions?

Response 4: ESG funds were awarded to four different organizations in the city. The Department of Housing and Community Development has a team whose focus is on housing and the use of residential vacant City property. Those types of innovative strategies that other cities are tackling are things we are looking into but currently, there is no plan for a tiny home village.

Comment 5: With high eviction rates and low barriers to eviction filing, is the City considering work with the court system and developing policies to create a diversion process so that folks can avoid eviction?

Response 5: The Norfolk Eviction Prevention Center is administrated by the Department of Neighborhood Services and serves to connect Norfolk residents facing eviction with funding and resources to mitigate immediate relief needs and stabilize households to reduce the risk in the long term. For more information, call (757) 664-6363 or email evictionprevention@norfolk.gov

Comment 6: Are there recommendations to prohibit for-profit LLCs from purchasing multifamily units, to reduce the number of short-term rentals on the market? Is there anything being done by the City to address this?

Response 6: The current recommendation to "mitigate opportunities for for-profit LLCs to acquire multi-unit properties at the end of their affordability period" is specifically

related to tax credit properties – these are required to maintain affordable units for 15 years or 30 years. The recommendation is to reduce the likelihood these will convert to market-rate at the end of the affordability period. There has also been discussion at City Council on short term rentals and right now, these are addressed on a case-by-case bases. The City continues to evaluate national research and consider options related to short term rentals.

Comment 7: Participant stated that he would appreciate some additional analysis around the R/ECAP and segregation due to the recent 2020 Census and pandemic, since historically underrepresented population may be undercounted in the Census and the effects of the pandemic are not completely understood. Would like to see how the data has changed overtime.

Response 7: The intention is to update the Analysis of Impediments every five years. Should new data reflect a significant change prior to five years, the City could amend the AI, if appropriate.

Comment 8: Participant believes that policy leaders in the City have a cavalier attitude on fair housing issues and lack an understanding of fair housing.

Response 8: The City of Norfolk takes its responsibility to uphold fair housing law very seriously and is currently working to develop a robust fair housing education campaign.

Comment 9: Data shows projects tend to be sited in areas that are majority African American, and participant would like to see stronger language that advocates for intentionality in areas of opportunity; more than a ten percent set-aside of affordable units is needed and rewards/incentives for builders should be offered. The set-aside alone does not address de-concentration of poverty in impacted area. Participant later asked that the City strengthen the recommendation that affordable housing be placed in areas of opportunity, beyond HUD's definition.

Response 9: This is partially explained by the state's criteria for LIHTC siting, which assigns points based on proximity to low-income communities. While the state's criteria are out of the City's direct control, the St. Paul's Advisory Committee and the Mayor's Commission on Social Equity and Economic Opportunity have proposed an inclusionary housing policy currently under discussion by leadership. The Analysis of Impediments has been updated to reflect a stronger recommendation.

Comment 10: Participant recommends more outreach to those who live in areas most impacted by housing barriers and commented that households in middle class and

upper middle-class areas are affected by housing barriers as well, so programs that reach more than just low income are needed.

Response 10: The City of Norfolk agrees that the impact of housing barriers is not limited to low-income households or neighborhoods. The Analysis of Impediments has been updated to better reflect the distinction between disadvantaged geographic areas, protected classes, and populations impacted by housing barriers.

Comment 11: Participant recommends looking at the relationship between housing and academic opportunities and cited the example of the City of Norfolk School Board focusing on children in the St. Paul's area. Suggested that the City be more intentional in addressing this area.

Response 11: This recommendation will be taken into consideration for future reports.

Comment 12: Participant recommended defining what affordable means for residents in Norfolk.

Response 12: The Analysis of Impediments has been updated to include this recommendation under 1.7.

Comment 13: Participant described the need to hold the City and NRHA accountable for the operation of existing programs and redevelopment efforts. Participant shared a variety of challenges being faced by residents of the St. Paul's Area and expressed a need for more targeted services and attention. Participant asked if there was documentation of the services provided by People First.

Response 13: The Saint Paul's Area Transformation project is overseen by the Mayor's Advisory Committee on St. Paul's. The board was established to provide leadership and work collaboratively with Residents, City Council, City Manager and Norfolk Redevelopment and Housing Authority on the revitalization of the St. Paul's Area. An impact report of People First efforts is published each year. The most recent impact report is published on the St. Paul's Area website, www.stpaulsdistrict.org

Comment 14: Does the 538 people identified as being unhoused in 2021 only represent Norfolk?

Response 14: Yes, the number identified represents Norfolk only.

Comment 15: Summary indicates there is LGBTQIA representation in the City? Who represents the LGBTQIA community?

Response 15: The LGBTQIA population is represented in a variety of ways. Norfolk Police has an LGBTQ+ police liaison or task force led by an openly gay Sergeant. The City of Norfolk recently appointed the first Diversity, Equity and Inclusion Officer and LGBTQ Liaison to the City Manager's Office and has expanded it with the FY 2023 budget to become an independent department with additional staff. The City of Norfolk also has an Equity Ambassador Training Initiative dedicated to promoting and developing culturally competent employees to serve as role models in support of the City's Diversity, Equity, and Inclusion efforts.

Comment 16: Is the homeowner maintenance program active and what is done if there is lead present in the home?

Response 16: Renovate Norfolk was paused during the pandemic but is now active and there is a significant waitlist. The program follows EPA guidelines and the Lead Safe Housing Rule for addressing lead either through mitigation or abatement. Visit <https://www.norfolk.gov/4879/Department-of-Housing-and-Community-Deve> for more information on this program.

Comment 17: For multi-family structures, affordable units, etc., are there incentives to encourage builders to develop with a clean, healthy, sustainable environment to reduce residents' exposure to environmental health hazards?

Response 17: Environmental factors are considered during local site plan review. The City of Norfolk offers expedited permitting for construction under the Green Home Choice program. Federally funded projects also have environmental requirements outlined by the National Environmental Policy Act that must be met through an environmental assessment process. This typically includes a contamination and air quality analysis and there are certain steps a builder must go through to address any issues noted during the review.

Comment 18: Since there is insufficient data on LGBTQIA population in the city, are there plans to collect this data or efforts to improve data collection since there is a significant LGBTQIA population in Norfolk? Was there outreach to this population as part of the survey or the stakeholders that service this population, i.e., the LGBT Life Center and other stakeholders.

Response 18: The Analysis of Impediments does rely heavily on Census data, which has limited information on LGBTQIA populations. There were no specific questions related

to LGBTQIA status on the local survey for the AI. While the City cannot control what is captured by the Census, questions relating to LGBTQIA status can be added to future local surveys. The LGBT Life Center was consulted prior to finalizing this document. They indicated that in some cases individuals are uncomfortable disclosing LGBTQIA status, resulting in an underreporting of need even when included in surveys, and expressed a need for housing options specifically for this population.

Comment 19: Participant asked for a breakdown of demographic data for survey respondents.

Response 19: A full copy of the survey results is included in the appendix.

Comment 20 (online): Are there any recommendations for the creation of creative housing types that are not standard single-family housing or apartments as an accepted form of housing? Shared rooming, rooms for rent, smaller housing types, etc.?

Response 20: The Analysis of Impediments examined housing diversity. Norfolk's housing stock is 79.2 percent single-family. Currently, HUD does not allow certain funding sources for co-ops or shared rooming arrangements, and Norfolk's zoning code stipulates that no more than four unrelated people may live together limiting certain types of co-ops and shared housing. Recommendations were included in the diversity of housing section to examine the appropriateness of single-family zoning and its ability to absorb housing demand, to provide technical assistance for missing middle, and to review prohibitions on manufactured housing.

B. Written Public Comments received August 23, 2022

The following questions and comments were received in writing by Norfolk staff during the 30-day public comment period for the 2022 Analysis of Impediments to Fair Housing. Norfolk Department of Housing and Community Development considered and analyzed all correspondence received during the public comment period. However, only in-scope and substantive comments have a response. Substantive comments included those that:

- Questioned, with reasonable basis, the accuracy of information in the report
- Suggested factual corrections or recommendations for additional analysis
- Caused changes to the report or recommendations
- Invited clarification or asked an in-scope question that may benefit all readers

The comments with responses are categorized as follows: general comments on the AI content, comments on specific pages of the AI and recommendations for addressing impediments and implementation of 2021 recommended actions.

General Comments on the AI content

Comment 21: Insufficient community outreach was done for the third-party survey for this analysis. 415 responses are less than 1 percent of the population of Norfolk. Future surveys should be sent around to community organizations who work directly with impacted community members, notices for surveys should be sent out in mailers and hung up around the city. Who was the community representative responsible for outreach for this analysis?

Response 21: The Department of Housing and Community Development commissioned the analysis and was responsible for outreach in partnership with the Department of Communications. Several methods of outreach were employed including email, online advertisement, and hard copies provided to Public Housing communities and Norfolk libraries. This recommendation will be taken into consideration for future reports.

Comment 22: Environmental experts were not consulted or brought in as stakeholders in the analysis process; future analyses should include independent experts and impacted community members to determine recommendations.

Response 22: The Norfolk City Planning Department, Office of Resilience, and Public Health were included as stakeholders, and each bring environmental expertise. This recommendation will be taken into consideration for future reports.

Comment 23: Environmental concerns should also address asbestos exposure in older homes and the health risks as a result of this exposure.

Response 23: This report utilized data from the U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool, which does not include specific data on asbestos. However, this recommendation will be taken into consideration for future reports.

Comment 24: Redlining is discussed and recognized by the analysis, but it is not clear how solutions proposed starting on page 192 of the study address the history of segregation in housing.

Response 24: Recommendations 1.5, 1.6, 5.1, 5.2, 5.3, 5.4, 5.5, and 7.5 serve as interventions designed to reduce historic segregation and home lending disparities caused by redlining and discrimination.

Comment 25: What is the definition of "high opportunity areas"? A discussion of issues with placement of voucher housing in "high opportunity neighborhoods" raises concern

about the recommendation to develop low-income housing in high opportunity areas without other mitigation on segregation on class and race factors in Norfolk.

Response 25: HUD's definition of a High Opportunity Area for Norfolk is a Census Tract with less than 40% poverty and less than 62.75% minority concentration.

Recommendations to develop affordable housing and encourage landlords to take vouchers in High Opportunity Areas will be paired with landlord and community education to combat bias/NIMBYism and enforce fair housing law.

Comment 26: A more thorough definitions or glossary section would have been helpful in understanding this document and its implications.

Response 26: This recommendation will be taken into consideration for future reports.

Comment 27: LGBTQ+ community organizations were not consulted or brought in as stakeholders in the analysis process. Future analyses should include LGBTQ+ community organizations who work directly with impacted community members to fill in data gaps and determine recommendations. To allow for increased community input from LGBTQ+ residents, there should be a two-week extension to the public comment process on this analysis.

Response 27: This recommendation will be taken into consideration for future reports. The City of Norfolk provided the standard 30 days for response. If the LGBTQIA community has additional questions or concerns relating to fair housing or housing in general, please email HUDentitlement@norfolk.gov.

Comment 28: Analyses like these should not solely rely on census data, which historically undercounts and underrepresents marginalized communities, and should instead strive to connect with community members and stakeholders who see and experience impediments to fair housing on a daily basis.

Response 28: Several non-Census data sources were reviewed and analyzed during the development of the AI, including HUD data, Norfolk-specific studies, stakeholder and resident interviews, and a community survey. This recommendation will be taken into consideration for future reports.

Comment 29: The senior population of Norfolk should be adjusted to the National retirement age of 62, instead of 65 to more accurately reflect the population. Senior Services of Southeastern Virginia begins their service for seniors at age 60. This 3-5 year gap in data must be included in order to fully address fair housing access for seniors.

Response 29: See Response 1.

Comment 30: What are the next phases following this analysis? Who is responsible for pursuing the items under Recommended Actions?

Response 30: The table of recommended actions lists the responsible agencies for each recommendation, demonstrating collaboration among multiple departments within the City and local non-profit/advocacy organizations. The Norfolk Department of Housing and Community Development is responsible for tracking and reporting on the actions taken to reduce impediments to fair housing.

Comments on specific pages of the AI

Comment 32: Regarding multi-family design guidelines, this speaks of income; however, it does not address racial segregation. Adding affordable units to impacted census tracts does not necessarily grow opportunities in low-impacted areas. What are the intentional efforts to grow affordable housing in non-impacted areas?

Response 32: See Response 9.

Comment 33: Referencing the Program and Portfolio Analysis. How does HUD consider CDBG and grant performance when rewarding new funding. Is there any connection between Impediments to Fair Housing and whether funds are granted?

Response 33: Grant performance in terms of timeliness impacts new funding. A CDBG Entitlement grantee, in accordance with the CDBG regulations at 24 CFR 570.902, must have a balance no greater than one and one-half (1.5) times its annual grant remaining in the Line of Credit, 60 days prior to the end of the program year. HUD has a longstanding policy of reducing the next year's grant allocation of a grantee that continues to be untimely.

To receive funds, HUD grantees are required to certify that they will affirmatively further fair housing, which is defined as taking meaningful actions to address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. HUD grantees may engage in fair housing planning to support their AFFH certifications, but the AFFH IFR does not require any specific form of planning or the submission of fair housing plans to HUD.

Comment 34: Impediment 1, recommendation f, needs a more intentional recommendation beyond “encouragement.” “Encouragement” rarely works and political decisions on proposed project by project lag behind. Other recommendations:

- Require 3rd party fair housing training of City Council, Planning Commission, and NRHA Commission.
- Add a fair housing analysis on staff reports for Planning Commission, City Council, and NRHA Commission proposals prior to voting action.

Response 34: See Response 9. Recommended actions proposed here will be taken under consideration.

Comment 35: Regarding impediment 5, recommendation b: What additional tools? What about the City placing its bank accounts with strong Fair Housing institutions and limiting or removing accounts with institutions that are not reinvesting. Provide a rank list of lenders.

Response 35: This recommendation will be taken into consideration for future reports. The proposed actions will be taken into consideration as the City begins to implement recommendations.

Comment 36: The list of interviewed stakeholders while impressive consists largely of service providers. The City of Norfolk should be much more deliberate and intentional about interview individuals who live in impacted areas and are in the protected classes. The City interviewing its own departments and sub-agencies does not lend itself to quality input regarding Fair Housing and its impediments. At the root of Jim Crow and racial segregation policies and practices was/is the “othering” of Black citizens and other impacted groups. Additionally, it maintains separation by creating middlemen to speak on behalf of citizens. Often these middlemen or middle organizations are funded on a non-performance basis whereby segregation and poverty are managed versus eradicated. A lack on input from citizens themselves diminishes the public input and the recommendations contain within this document.

Response 36: This recommendation will be taken into consideration for future reports.

Comment 37: Regarding the community survey responses, include a chart by neighborhood. Zip Codes are large areas with some Zip Code representing the racial and economic disparity identified in this document.

Response 37: This recommendation will be taken into consideration for future reports.

Comment 38: Inaccurate R/ECAP map on page 141.

Response 38: The final AI has been amended to reflect this correction.

Comment 39: Regarding the school proficiency index, little to no deliberate effort exists between the City Council and School Board (policy makers) to address School Proficiency and impacted areas. This document could benefit from some inclusion of Norfolk's intentional efforts over decades to foster school segregation through housing policies and practices.

Response 39: This recommendation will be taken into consideration for future reports.

Comment 40: Referencing homeownership and lending analysis, include an analysis of real estate assessments conducted by the City and appraisals conducted by vendors to determine disparities impacted Black home and property owners in Norfolk. See <https://www.nytimes.com/2022/08/18/realestate/housing-discrimination-maryland.html>

Response 40: This recommendation will be taken into consideration for future reports.

Comment 41: Regarding broadband access, access does not mean inclusion, digital literacy, and digital impact. Norfolk should adopt a Digital Inclusion Plan focused on usage, digital fluency, and digital outcomes.

Response 41: The proposed action will be taken into consideration as the City begins to implement recommendations.

Recommendations for addressing impediments and implementation of 2021 recommended actions.

Comment 42: The AI report mentions ways to respond to the lack of accessible housing stock. Along with increasing the development of accessible housing, we would recommend that the City evaluate the local building permit process to ensure compliance to all accessibility building code requirements for multi-family housing properties.

Response 42: The proposed action will be taken into consideration as the City begins to implement recommendations.

Comment 43: To ensure fair housing choice among those who are homeless, we recommend that the City ensures that homeless shelters and non-congregate shelter

programs are accessible to individuals with all disabilities, including those with mobility disabilities.

Response 43: The proposed action will be taken into consideration as the City begins to implement recommendations. In general, the ADA does not require any action that would result in a fundamental alteration in the nature of a service, program, or activity or that would impose undue financial and administrative burdens.

Comment 44: In regard to data on homeless, we recommend including data on those who are unsheltered to show a full extent of the homeless population.

Response 44: In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey. As a result, the unsheltered population sub-totals and all unsheltered sub-population data are excluded for the reporting period included in this report.

Comment 45: With the use of Continuum of Care and other federal funds, we recommend adequate funds to meet affordable and accessible housing needs of those who are homeless, chronically homeless and at risk of homelessness, including those who are at risk while facing discharge from an institutional facility. Prevention and homelessness assistance along with supportive services should be adequate to ensure that the person can become stabilized and able to successfully maintain housing.

Response 45: The proposed action will be taken into consideration as the City begins to implement recommendations.

Comment 46: Under the section for Fair Housing Choice, we would recommend including the protection of the Virginia Fair Housing Law for protected groups such as discrimination on the basis of source of funds. Can the City evaluate the trend of rising rents after the Virginia Fair Housing Law was amended to protect those who are recipients of Housing Choice Vouchers and other rental subsidies? We would recommend activities to increase public awareness of this basis to prevent potential renters from being turned away because they have a rental voucher or landlords enforcing income qualifications based on total rent rather than on the recipient's rent portion.

Response 46: The City maintains a fair housing ordinance found in Chapter 45.1 of the Municipal Code. The Code was updated in 2022 to prohibit housing discrimination in Norfolk based on "source of funds," which is consistent with the same state policy that was established in 2020. The City of Norfolk takes its responsibility to uphold fair

housing law very seriously and is currently working to develop a robust fair housing education campaign. The recommendation to evaluate rising rents will be taken into consideration for future reports.

Comment 47: To ensure accessibility options among private and public subsidized units, to ensure that those housing providers that have completed repairs and substantial rehab alterations to included accessibility to meet the legal percentage of accessible units. We also recommend that Norfolk Redevelopment and Housing Authority increase the minimum legal percentage of 5% accessible units to meet the current low-income population of people with mobility and sensory disabilities, in consideration of those not only in the community but for those also transitioning from institutionalized settings.

Response 47: The proposed action will be taken into consideration as the City begins to implement recommendations.

Comment 48: In regard to home lending disparities, to ensure fair housing choice for those who are eligible for the HCV Home Ownership program, we recommend surveying the percentage of homes that would qualify for a home loan and the structural conditions of these homes.

Response 48: This recommendation will be taken into consideration for future reports.

Comment 49: Norfolk's high rate of housing cost burden, combined with aging housing stock, should be addressed by weatherizing, and updating homes, especially multifamily and public housing to lower high energy costs. Upgrades to building codes/standards, as well as appliance standards should be considered or pursued. Building energy performance standards in multifamily buildings should be implemented.

Response 49: The City does run a rehabilitation program – see response 16. The proposed action will be taken into consideration as the City begins to implement recommendations.

Comment 50: Goals per the Mayor's Advisory Commission on Climate Change mitigation and Adaptation Climate Action Plan should be considered for future development and energy-efficiency.

Response 50: The proposed action will be taken into consideration as the City begins to implement recommendations.

Comment 51: Public and multifamily housing should be electrified to remove gas appliances, improving air quality for residents as well as making housing more energy efficient.

Response 51: The proposed action will be taken into consideration as the City begins to implement recommendations.