



Assessment of Fair Housing Plan for the HUD Housing & Community Development Consolidated Plan 2018 - 2022

Ethan Berkowitz, Mayor

Municipality of Anchorage
Department of Health & Human Services
Final 2017



Melinda L. Freemon, Director
Department of Health and Human Services

Mail: Municipality of Anchorage
Department of Health and Human Services
Housing and Community Services Division
Community Safety and Development
Nancy Anderson, CSD Program Manager
PO Box 196650
Anchorage, AK 99519-6650
Email: andersonnv@muni.org
Physical Address: 825 L Street, Room 506

The Municipality of Anchorage, Department of Health and Human Services, would like to thank the following persons for assisting and facilitating with the public participation process of the Assessment of Fair Housing Plan.

Jeremy Baker, Fair Housing Enforcement Project Director, Alaska Legal Services Corporation

Dan Coons, Fair Housing Attorney, Alaska Legal Services Corporation

Krista Stapleford, 2016 Summer Intern, High School Senior



Table of Contents

Table of Contents	1
II. Executive Summary	3
III. Community Participation Process.....	5
IV. Assessment of Past Goals, Actions and Strategies	12
V. Fair Housing Analysis Section A. Demographic Summary	16
V. Fair Housing Analysis Section B. General Issues	18
i. Segregation/Integration.....	18
ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).....	23
iii. Disparities in Access to Opportunities	27
iv. Disproportionate Housing Needs	48
V. Fair Housing Analysis Section C. Publicly Supported Housing Analysis.....	54
V. Fair Housing Analysis Section D. Disability and Access Analysis.....	64
V. Fair Housing Analysis Section E. Enforcement, Outreach Capacity and Resources Analysis.....	72
VI. Fair Housing Goals and Priorities.....	75
Appendix A – List of HUD and Local Data Sources.....	84
Appendix B – 2014 5 Year American Community Survey Maps	85
Appendix C – Public Comments.....	91
Appendix D – Affidavit of Publication of the 1st and 2nd Public Notices.....	130

Cover Sheet for Assessment of Fair Housing (AFH) Plan

1. Submission Date: **June 13, 2017**
2. Submitters Name: **Municipality of Anchorage**
3. Type of Submission: **Single Program Participant**
4. Type of Program Participant: **Formula Grant Recipient**
5. For PHA, Jurisdiction in which the program participant is located: **NA**
6. Submitter Members: **NA**
7. Sole Contact Information:

Name: Melinda L. Freemon

Title: Director

Department: Health and Human Services

Street Address: 825 L Street/ P.O. Box 196650

City: Anchorage

State: Alaska

Zip Code: 99519-6650

8. Period Covered by this Assessment: **January 1, 2018 - December 31, 2022**
9. Number of Submission: **Initial AFH**
10. To the best of its knowledge and belief, the statement and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 CFR §§5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AHF conducted in accordance with the requirements in §§5.150 through 5.180 and 24 CFR §§91.225(a), 91.325(a), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

Melinda L. Freemon, Director, Department of Health & Human Services

June 13, 2017

Date

II. Executive Summary

The Federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 USC §§3601-3631) prohibit discrimination related to the sale, rental lease or negotiation for real property. Federal law prohibits discrimination based on race, color, national origin, religion, sex, disability, and familial status. There are three Federal exemptions: owner/lessor/manager occupied building with 4 units or less; home sold/rented by owner, if owner doesn't own more than 3 homes or use a real estate agency or has sold multiple homes in the last 24 months; and, housing owned/operated by religion organization or private club for non-commercial purposes.

The Alaska State Statutes (AS §§18.80.210, 240) prohibits discrimination based on race, color, national origin, religion, sex, disability, marital status, changes in marital status, pregnancy and age. The State statutes adds marital status, changes in marital status, pregnancy and age protected groups to the Federal Fair Housing Act. The State however, drops familial status from the Federal Fair Housing Act. The State has no exemptions.

The Anchorage Municipal Code (AMC §§5.20.020, 5.25.025) prohibits discrimination based on race, color, national origin, religion, sex, disability, familial status, marital status, sexual orientation, gender identity and age. The Municipal codes add sexual orientation and gender identity to the State statutes and Federal Fair Housing Act. There are two Municipal exemptions: owner/lessor/manager occupied building with 4 units or less; and, housing owned/operated by religion organization or private club for non-commercial purposes.

The U.S. Department of Housing and Urban Development (HUD) requires a grant recipient or Jurisdiction, such as the Municipality of Anchorage (MOA), Department of Health and Human Services (DHHS), to affirmatively further fair housing, to conduct an analysis of patterns of discrimination and to promote fair housing choice. The HUD definition of affirmatively furthering fair housing means to take meaningful actions to combat discrimination, overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

The HUD analysis of Anchorage has identified one (1) Racially or Ethnically Concentrated Area of Poverty (R/ECAP), the Mountain View/Government Hill neighborhoods. HUD calculates R/ECAP area based on the 2010 Census Tract data. R/ECAP is 2010 Census Tract 6 where at least 50% of the population is non-white and/or Hispanic and has an income threshold that looks at the poverty rate. The poverty rate on that census tract has to be either 40% or more or three times the rate of the poverty rate for that Municipality as a whole.

The HUD analysis of the communities of the Municipality has identified the Core-based Statistical Area (CBSA) Region to include the geographic area of Alaska from as far north as Talkeetna, south as Portage, west as Susitna and east as Eureka Roadhouse. The largest and most significant population in the CBSA Region is the Matanuska-Susitna (Mat-Su) Borough. When referencing the CBSA Region in the Assessment to Fair Housing Plan, the Mat-Su Borough will be referenced since the borough communities are the only communities in the Region that may be impacted by the Municipality's policies in the plan.

The HUD Affirmative Furthering Fair Housing (AFFH): Final Rule dated July 16, 2015, 24 CFR Part 5, 91, 92, requires the MOA to submit an Assessment of Fair Housing (AFH) plan to HUD by April 6, 2017. The AFH plan must be approved by HUD in order for the MOA to receive the approximately \$2.3 million in annual grant funds for low-income housing and development in the Municipality of Anchorage that includes the communities of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna and Girdwood (Turnagain Arm). The annual formula-based grants received from HUD are the Community Development Block Grant (CDBG), Home Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG). After the first AFH plan, the MOA must submit an AFH plan at least every five years.

Contributing factors to the fair housing issues in the Municipality of Anchorage were identified after a review of HUD data, local data sources, comments during community meetings and events, community survey results, and work sessions/interviews with partner agencies. Representatives from the Municipality of Anchorage's Department of Public Transportation, Alaska Housing Finance Corporation – Public Housing, Anchorage School District, and Governor's Council on Disabilities and Special Education helped review and write their sections of the AFH plan.

Contributing factors to fair housing issues in the Municipality of Anchorage include:

1. Availability of affordable and accessible units in a range of sizes
2. Lack of access to opportunity due to high housing costs
3. Displacement of residents due to economic pressures
4. Land use and zoning laws
5. Loss of affordable housing
6. Lack of assistance for housing accessibility modifications
7. Sources of income discrimination
8. Availability, type, frequency, and reliability of public transportation
9. Community opposition
10. Lack of local private fair housing outreach and enforcement

The AFH plan's goals to address the fair housing contributing factors in the Municipality of Anchorage were identified after a review of HUD data, local data sources, comments during community meetings and events, community survey results, and work sessions/interviews with partner agencies. The following goals, not listed in order of priority, are:

1. Consider actions that will affirmatively further fair housing in decisions regarding land use and allocation of housing opportunities, and regarding zoning or land use regulations which may inhibit the development of housing for persons in protected classes.
2. Promote balanced neighborhoods with diverse infill housing, and provide opportunities for development of affordable and accessible housing that avoids creating areas of concentrated low-income housing.
3. Expand and market housing assistance programs for the protected classes of the residents.
4. Facilitate access to safe, affordable and supportive housing upon prisoner reentry into the community.

5. Partner with other agencies to provide public education about protected classes under the Fair Housing Act and Municipal law to housing professionals, landlords, renters and homebuyers.
6. Expand the educational and marketing materials of fair housing laws available in English and the top four languages spoken in Anchorage (Tagalog, Spanish, Korean, and Tongan).

III. Community Participation Process

1. *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible.*

Public Hearing and Comment Period

The MOA held two public hearings to obtain public comments on the AFH plan for Anchorage and communities of the Municipality. The MOA held hearings covered by the AFH plan at times and locations convenient to potential and actual beneficiaries, and with accommodation for residents with disabilities. MOA would provide interpreters at public hearings when the MOA expected a significant number of non-English speaking residents to attend or upon request. No interpreters were requested at the two public hearings.

The first 30 day public comment period to introduce the AFH planning process started on May 10, 2016 and ended at 4:00pm on June 13, 2016. The public comment period and hearing notice was advertised in the Alaska Dispatch News classified section on May 10, 2016. The notice was emailed to 394 on the citizen participation list maintained by DHHS, emailed to the 40 community councils, emailed to 38 news medias, and emailed to the Anchorage Coalition to End Homelessness membership list.

The MOA held the first public hearing on May 25, 2016 that started at 3:30pm at the MOA, DHHS, 825 L Street, conference room 423. The public hearing was attended by seven persons from the public. MOA introduced the AFH planning process and answered questions from representatives of the public. All public agencies represented gave oral testimony. See Appendix C for a transcript of the testimonies.

The second 30 day public comment period to review the draft AFH plan started on January 18, 2017 and ended at 4:00pm on February 21, 2017. The public comment period and hearing notice was advertised in the Alaska Dispatch News classified section on January 18, 2017. The AFH plan was posted on the Municipality's DHHS website and for 3 weeks on the Municipality's front page website, emailed to 394 on the citizen participation list maintained by DHHS, emailed to the 40 community councils, emailed to 38 news medias, emailed to the Anchorage Coalition to End Homelessness membership list, and emailed to partner agencies that participated in

drafting the AFH plan. Paper copies were made available at the Loussac Library, Anchorage Coalition to End Homelessness office and Public Housing's Anchorage Family Investment Center.

The MOA held the second public hearing on February 1, 2017 that started at 4:00 pm at the MOA, City Hall, 632 W. 6th Avenue, conference room 155. The public hearing was an opportunity for representatives from agencies, organizations and residents of the MOA to address the proposed strategies and actions for affirmatively furthering fair housing in the AFH plan presented by the MOA. The public hearing was attended by three persons from the public. One public agency represented gave oral testimony. See Appendix C for a transcript of the testimony.

The participation of all residents was encouraged and reasonable accommodation was offered for those residents with disabilities who need auxiliary aids, services, or special modifications and non-speaking English residents. No one from the public requested accommodations or interpreters at the two public hearings.

The Municipality departments have access to a system called Language Link, which has dozens of translators on hand. The individual points to their language on the poster of the department that they are in, the Municipal employee calls the 1-800 number and the number connects them to a translator. The translator then speaks via speaker phone to the individual.

Outreach Activities

For the AFH plan, the MOA consulted with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, organizations that represent protected class members and organizations that enforce fair housing laws. Additionally, the MOA consulted with the Alaska Housing Finance Corporation regarding public housing programs, neighborhood improvement programs, and resident programs and services.

The MOA co-sponsored with the local Anchorage HUD office two AFFH events that involved training provided by HUD fair housing representatives and participation by public agencies and municipal departments. On August 9, 2016, a training titled, "Integrating Fair Housing into Planning & Development in Anchorage", was delivered by Sarah Lindsley, Senior Management Analyst at HUD Region X, and attended by 26 participants from public agencies representing HUD, MOA DHHS and Planning Departments, Public Housing, affordable housing developers and social service agencies.

The second AFFH event that the MOA co-sponsored with the local Anchorage HUD office was held on September 20, 2016 as a work session titled, "Coordinating Fair Housing, Land Use, Transportation and Schools in Anchorage". Danielle Arigoni, Acting Director of Economic Resilience at HUD Washington D.C. was the guest speaker. The work session included short presentations by representatives from the MOA DHHS on fair housing trends, MOA Planning Department on the Anchorage land use plan, MOA Department of Public Transportation on the public transportation plan, and the Anchorage School District's programs that assist with

minority and low-income/homeless students. The work session was attended by 22 participants from public agencies representing HUD, MOA DHHS, Planning Department, Transit and Transportation, Public Housing, Anchorage School District and affordable housing developers.

MOA developed a short four question fair housing survey that was reviewed by the Fair Housing Enforcement Project Director at Alaska Legal Services Corporation. The survey took less than 5 minutes to complete. The survey was used as a tool to encourage the community to participate in the AFH plan discussion and talk about their fair housing concerns to MOA staff at the meetings and events. Whenever possible, MOA partnered with the Fair Housing Enforcement Project Director at Alaska Legal Services Corporation when invited to give a presentation on AFFH process in developing the AFH plan for the MOA and distribute the fair housing survey. MOA staff would provide both a written and oral fair housing survey for persons with disabilities and/or limited English proficiency.

MOA's strategy for effectively reaching as many of the different public and private agencies was to go to their meetings and events instead of inviting them to MOA's AFH plan meetings and hoping they would come. MOA communicated with organizations serving various race/ethnic groups to insure adequate involvement within Anchorage. MOA disseminated fair housing materials and the fair housing survey to nonprofit organizations serving the Anchorage's culturally diverse population.

MOA offered language interpreters to clients with limited English proficiency (LEP) at the DHHS Public Health Services (PHS) and Women Infants & Children (WIC) offices, including the WIC office located on the Alaska Native health campus, where the surveys were distributed. As an incentive for completing the survey at the PHS and WIC offices, two \$50 grocery store gift cards were awarded to the winners of drawings held for each office.

MOA's attendance at two neighborhood Mobile Food Pantry events that presented an opportunity to discuss fair housing concerns with low-income residents, and residents with disabilities and LEP. Additionally, MOA's attendance at the Brother Francis Shelter provided an opportunity to discuss and survey 30 homeless residents some with disabilities about fair housing concerns.

Three work sessions were held with the Municipality of Anchorage's DHHS, Department of Public Transportation and Planning Department. These work sessions were important as all three departments were in planning phases and coordination was essential to the outcomes of the plans.

The Planning Department's Anchorage 2040 Land Use Plan established some of the following housing objectives:

1. Plan enough space for the kinds of housing that will be needed.
2. Identify where the housing growth will occur.
3. Focus more growth in commercial districts (downtown).
4. Enhance neighborhood characteristics and appeal in areas of growth.
5. Show a plan to invest in infrastructure in area of growth.
6. Show a plan to incentivize development of needed housing.

7. Provide for equity in housing, access to jobs, good neighborhoods

These housing objectives address many of the fair housing contributing factors and assist in implementing the goals of the AFH plan. The Municipality’s Planning Department, Anchorage 2040 Land Use Plan website at

<http://www.muni.org/Departments/OCPD/Planning/Projects/AnchLandUse/Pages/default.aspx>

The Department of Public Transportation’s introduced to Anchorage residents two concepts that shift public transit service away from coverage in neighborhoods towards higher ridership. The two concepts are an 80/20% ridership-coverage split and a 100% ridership. The outcome of increased ridership results in some neighborhoods no longer covered by public transit. Those neighborhoods that are covered will have more frequent public transit service. The public comment period on the two concepts ended on December 31, 2106. The MOA expects to implement one of these new ridership concepts in August 2017.

See the Municipality’s Department of Public Transportation, People Mover website at www.peoplesmover.org/transittalks to view the report titled “Anchorage Talks Transit, Choices, Outreach and Future Alternatives” by Jarrett Walker + Associates that includes maps and tables.

Representatives from the Municipality of Anchorage’s Department of Public Transportation, Alaska Housing Finance Corporation – Public Housing, Anchorage School District, and Governor’s Council on Disabilities and Special Education helped review and write appropriate sections of the AFH plan.

2. Provide a list of organizations consulted during the community participation process.

Community Presentations, Survey Distribution, Work Sessions and Q&A

	2018-2022 AFH Plan	Date	Community Representation	Number of Participants
1	AK Work Sources & Tuta’n Recovery (staff & clients)	6/3/2016 AFH Presentation & Survey	Persons with disabilities, prisoner re-entry & homeless	27
2	Sand Lake Community Council	6/6/2016 AFH Presentation & Survey	Neighborhood representatives	25
3	Russian Jack Community Council	6/8/2016 AFH Presentation & Survey	Neighborhood representatives	12-15
4	Mountain View Street Fair	6/11/2016 AFH Survey	R/ECAP neighborhood	10
5	ADA Advisory Commission	6/21/2016 AFH Presentation & Survey	Representing individuals with disabilities	9
6	Anchorage Women’s Commission	6/21/2016 AFH Presentation & Survey	Women	9
7	Senior Citizens Advisory Commission	6/22/2016 AFH Presentation & Survey	Seniors	9

8	Alaska PrideFest	6/25/2016 AFH Survey	LGBT	22
9	DHHS Public Health Services (clients)	7/5/2013 – 7/29/2016 AFH Survey	Health services includes children, LEP	58
10	DHHS WIC (clients)	7/5/2013 – 7/29/2016 AFH Survey	Services to children, LEP	73
11	Mobile Food Pantry (Lutheran Church of Hope)	8/2/2016 AFH Survey	LGBT, seniors & persons with disabilities, LEP	5
12	Housing & Neighborhood Development (HAND) Commission	8/3/2016 AFH Presentation & Survey	Housing & homeless representatives	8
13	HAND Commission's Oversight Subcommittee on Homelessness (HCOSH)	8/3/2016 AFH Presentation & Survey	Housing & homeless representatives	5
14	Integrating Fair Housing into Planning & Development in Anchorage	8/9/2016 Work Session	Public Transit, Planning, Affordable Housing, Mental Health Services, Public Housing	27
15	Covenant House (Passage House)	8/10/2016 AFH Presentation & Survey	Youth	3
16	Mobile Food Pantry (Centennial Village)	8/17/2016 AFH Survey	LGBT, seniors & persons with disabilities, LEP	5
17	Catholic Social Services (directors meeting)	8/25/2016 AFH Presentation & Survey	Homeless, seniors & persons with disabilities	12-15
18	Tudor Community Council	9/1/2016 AFH Presentation & Survey	Neighborhood representatives	10-12
19	Spenard Community Council	9/7/2016 AFH Presentation & Survey	Neighborhood representatives	15-20
20	Abused Women Aid In Crisis (staff)	9/8/2016 AFH Presentation & Survey	Domestic violence victims	15
21	Fairview Community Council	9/8/2016 AFH Presentation & Survey	Neighborhood representatives	20-25
22	Coordinating Fair Housing, Land Use, Transportation & Schools in Anchorage	9/20/2016 Work Session	Public Transit, Land Use Planning, Affordable Housing, Schools	22
23	Brother Francis Shelter (clients)	9/26/2016 AFH Survey	Homeless & persons with disabilities, LEP	30
24	Coordinating Fair Housing, Land Use, Transportation in Anchorage	10/20/2016 Work Session	Public Transit, Land Use Planning, Affordable Housing	12-15
25	Habitat for Humanity Anchorage (staff & homeowners)	10/25/2016 AFH Survey	Seniors, persons with disabilities and potential homebuyers	12
26	Alaskan AIDS Assistance Association (staff & clients)	10/28/2016 AFH Presentation & Survey	Persons with HIV/AIDS	10
27	Anchorage Equal Rights Commission	11/15/2016 AFH Q & A	Fair housing enforcement	1

28	Governor's Council on Disabilities and Special Education	11/10/2016 AFH Q & A AFH Reviewer	Persons with disabilities	2
29	Ombudsman Office of Anchorage	11/17/2016 AFH Q & A	Fair housing enforcement	1
30	Alaska Legal Services Corporation	11/17/2016 AFH Q & A	Fair housing enforcement	1
31	Coordinating Fair Housing, Land Use, Transportation in Anchorage	11/21/2016 Work Session	Public Transit, Land Use Planning, Affordable Housing	12-15
32	Department of Public Transportation	12/15/2016 AFH Reviewer	Public transportation	3
33	AHFC – Public Housing Department	12/15/2016 AFH Reviewer	Public housing	2
34	Anchorage School District	12/20/2016 AFH Reviewer	School district k-12	1
35	Coordinating Fair Housing, Land Use, Transportation in Anchorage	12/15/2016 Work Session	Public Transit, Land Use Planning, Affordable Housing	12-15

3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among a particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

The fair housing survey was a successful tool for encouraging the community to participate in the AFH planning discussion and talk about their fair housing concerns to MOA staff at the meetings and events. The MOA received 332 completed surveys that were distributed at most of the meetings and events listed in the table above. The MOA would start the AFH planning phase earlier so that more protected class groups could participate in the AFH survey.

The MOA will attempt to attend more meetings and events located in the R/ECAP neighborhood of Mountain View. During the next AFH planning phase, MOA will coordinate earlier in the planning phase with the Mountain View and Government Hill Community Councils and attend their meetings. MOA would coordinate earlier to attend the Mobile Food Pantry held almost weekly in the Mountain View neighborhood. MOA's attendance at other neighborhood Mobile Food Pantry events presented an opportunity to discuss fair housing concerns with low-income residents, and residents with disabilities and LEP.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

The MOA received comments at the first public hearing on May 25, 2016 from the seven persons from public agencies represented at the hearing. The public agencies represented were Alaska Legal Services Corporation, Valley Residential Services, Cook Inlet Housing Authority, Habitat for Humanity Anchorage and Rural Alaska Community Action Program. The comments received at the hearing were fair housing concerns for the very vulnerable populations that

included; elderly, families with young children, persons with disabilities and victims of domestic violence. This population of residents often don't know what they can do once they get a notice that they are being evicted and potentially losing their Section 8 Housing Vouchers. Fair housing concerns were expressed for residents with criminal backgrounds being denied housing in Anchorage. As a result, a number of housing providers both subsidized housing providers and private landlords, have overly broad rental policies that limit access to housing. See Appendix C for transcripts of the testimonies.

The MOA received comments at most of the outreach activities through the 332 completed fair housing assessment surveys. Thirty-two percent (32%) of the respondents felt that they had experienced some form of housing discrimination. Respondents identified the top three reasons why they felt they were discriminated against as income/bad credit, criminal history and age. Thirty-eight percent (38%) of the respondents were not aware of agencies that handled fair housing discrimination. Respondents identified the top three ways they felt they were discriminated against as landlord refusal to rent to them, told a rental was unavailable when it was, and shown rentals only in certain neighborhoods. All respondents who had purchased a home felt they had not experienced fair housing discrimination when purchasing a home.

On August 9, 2016, at the “Integrating Fair Housing into Planning & Development in Anchorage” work session co-sponsored by MOA and local HUD office was attended by 27 participants. Representatives from the Municipality of Anchorage’s Department of Health & Human Service, Department of Public Transportation, Planning Department and ADA Coordinator participated at the work session. Partner agencies participating at the work session included Alaska Housing Finance Corporation, Anchorage School District, Cook Inlet Housing Authority, NeighborWorks Alaska, and Rural Alaska Community Action Program. Comments received from the participants were about the Municipality’s biggest impact with fair housing concerns due to the increase in the immigrant population along with an increase in limited English proficiency; and the need to think of more effective ways to connect with the people in which English is not their first language. Comments included discussion that instead of speculating, maybe Anchorage could be surveyed asking if neighborhoods would prefer to have more housing and opportunities available in their neighborhoods or would they prefer to live somewhere else such as the south side of Anchorage where there are good opportunities for schools and jobs. Comments included discussion of the most widely used and most effective tools for addressing the lack of affordable housing and segregation. One of the tools for responding to segregation is inclusionary zoning; where a multiple family housing developer is incentivized or required to build a certain percentage of units as affordable housing.

On September 20, 2016, at the “Coordinating Fair Housing, Land Use, Transportation and Schools in Anchorage” work session co-sponsored by MOA and the local HUD office was attended by 22 participants. Representatives from the Municipality of Anchorage’s Department of Health & Human Service and Department of Public Transportation participated at the work session. Partner agencies participating at the work session included Alaska Housing Finance Corporation, Alaska Legal Services Corporation, Anchorage Community Mental Health Services, Anchorage Housing Initiatives, Anchorage School District, Cook Inlet Housing Authority, NeighborWorks Alaska, Rural Alaska Community Action Program and Volunteers of

America. Comments included discussion of the most effective use of the limited land in the Anchorage bowl and how to address the lack of affordable housing.

At the second public hearing on February 1, 2017 the MOA received comments from the one person from Alaska Legal Services Corporation at the hearing. Alaska Legal Services Corporation disagrees with the AFH plan's conclusion that Anchorage doesn't have race/ethnic segregated housing patterns and does have income segregated housing patterns. Also Alaska Legal Services Corporation disagree with the AFH plan's conclusion that the R/ECAP neighborhood of Mountain View has no relevant characteristics that set the neighborhood apart from other Anchorage neighborhoods. MOA will not make a statement about whether or not Anchorage has race/ethnic segregated housing patterns in neighborhoods. MOA will state Anchorage has income segregation patterns in neighborhoods in the final AFH plan. MOA believes that the HUD and local data supports this conclusion.

Alaska Legal Services Corporation comments included strengthening the goals, activities and adding outcomes in the AFH plan. MOA reviewed the section and added outcomes. MOA added language explaining more thoroughly the community participation process that included the fair housing survey, meetings, events and work sessions that had not been included in the draft AFH plan. Lastly, Alaska Legal Services Corporation commented that MOA did not address HUD questions in the AFH plan. MOA agrees that there were some inadequate answers in the AFH plan when HUD and local data was not available to adequately answer the questions. MOA was instructed by HUD to write that the question cannot be answered due to lack of sufficient data. See Appendix C for a transcript of the testimony.

On February 15, 2017, MOA received written comments from the Planning Department. The Planning Department recommended that MOA include the importance of the Anchorage 2020 Land Use Plan in address housing goals in the AFH plan. The Planning Department also commented that MOA DHHS should review the AFH plan for clarity, discrepancies and explain the HUD tables and local data/maps in more detail. MOA has reviewed the AFH plan and re-wrote some sections to improve clarity and detail in the final AFH plan. See Appendix C for a transcript of the testimony.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by the program participant in recent Analyses of Impediments (AIs), Assessment of Fair Housing or other relevant planning documents.

a. Discuss what progress has been made towards the achievement of fair housing goals.

The impediments selected by MOA in the Analysis of Impediments (AI) to Fair Housing, February 2015, by Susan Fison & Associates, are similar to the impediments in the AFH plan. The AI six impediments and goals to fair housing in Anchorage are as follows:

AI goals for impediment #1 lack of knowledge of the classes of people protected by fair housing laws.

- a. Municipality DHHS should work with Alaska Housing Finance Corporation and Alaska Legal Services Corporation to increase visibility of fair housing issues;
- b. Distribute the AIFHC report to Municipal officials, Assembly, and relevant government, non-profit and businesses;
- c. Form working group to review AIFHC report, prioritize and track progress;
- d. Plan Fair Housing Month; and
- e. Collaborate with Alaska Housing Finance Corporation on the next fair housing survey.

AI goals for impediment #2 low awareness of available fair housing enforcement mechanisms, caused at least in part by lack of fair housing advocacy organizations.

- a. Municipality (AERC & DHHS) support Alaska Legal Services Corporation with the Fair Housing Initiatives Program grant award from HUD;
- b. Alaska Legal Services Corporation with the FHIP grant will:
 - i. Expand fair housing enforcement;
 - ii. Increase intake, referrals and advocacy resources to victims;
 - iii. Increase resources to conduct investigations;
 - iv. Provide referrals to agencies and private attorneys; and
 - v. Provide education and outreach to community members, landlords and social service providers.

AI goals for impediment #3 financial barriers and lack of accessible housing stock limit housing opportunities for persons with disabilities.

- a. Fair Housing Accessibility First training scheduled on April 29, 2015 in Anchorage. Alaska Housing Finance Corporation is sponsoring the training and the Municipality is a co-sponsor;
- b. Municipality's Aging and Disability Resource Center should develop a plan to increase awareness opportunities for seniors to age in place;
- c. Consider using Municipality's HUD Community Development Block Grant funds towards universal design modifications to assist seniors to age in place; and
- d. Collaborate with Alaska Housing Finance Corporation on developing housing for individuals with disabilities.

AI goals for impediment #4 Municipal regulations and various administrative policies, procedures and practices.

- a. Partner with Alaska Legal Services Corporation and Alaska Housing Finance Corporation to take an active role in educating the public about the need for more housing for people with disabilities and seniors;
- b. Review the cost versus benefit of special limitations placed on group housing, such as, zoning ordinances

AI goals for impediment #5 lack of available affordable housing stock designed to meet the needs of people in one or more protected classes.

- a. Reduce excessive parking requirements for rental housing;
- b. Allow smaller lot sizes in R-1 Districts;
- c. Facilitate increased density for infill lots;

- d. Facilitate redevelopment of blight areas;
- e. Encourage more Accessory Dwelling Units; and
- f. Plan ahead for the potential redevelopment of mobile home parks.

AI goals for impediment #6 neighborhood opposition to group housing, increased residential density and rental housing.

- a. Develop programs to educate community councils about the Fair Housing Act;
 - b. Presentations to community councils about the need and benefits of group housing, supportive housing and rental housing;
 - c. Promote full continuum of supported housing; and
 - d. Promote awareness of fair housing through the Municipal and community channels and address areas where fair housing is impeded.
- b. *Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).*

The MOA addressed the impediment #1 goals to increase the visibility of fair housing by distributing the AI report to the Municipal departments, assembly members, non-profit organizations and posting the report on the MOA website. The MOA was not successful in working with the Municipality's Housing and Neighborhood Development Commission to form a task group to track the progress of the report.

For the impediment #1 goals, the MOA collaborated with HUD, Alaska Housing Finance Corporation and Alaska Legal Services Corporation to celebrate and publicize Fair Housing Month in April 2016. The goal to increase the visibility of fair housing remains the same goal in the AFH plan as well as other collaborative activities to increase public awareness of fair housing laws.

The MOA addressed the impediment #2 goals to support Alaska Legal Services Corporation with their Fair Housing Initiatives Program grant award from HUD and also awarded Community Development Block Grant funds to help pay for legal services for low-income families facing possible evictions. The MOA also partnered with Alaska Legal Services Corporation at some of the community outreach efforts for the AFH plan.

The MOA addressed the impediment #3 goals to co-sponsor with HUD and Alaska Housing Finance Corporation a fair housing accessibility training on April 29, 2015. The AFH goal is to schedule and co-sponsor a similar fair housing accessibility training during the 5 year AFH plan. The MOA and Alaska Housing Finance Corporation continue to collaborate with funding housing development projects for individuals with disabilities. The Municipality's Aging and Disability Resource Center continues to work to increase awareness opportunities for persons with disabilities and seniors.

The MOA addressed the impediment #5 goals of increasing the available housing stock of low-income residents with disabilities and low-income seniors. An outcome of the community outreach efforts the MOA's DHHS, Department of Public Transportation, Planning Department have begun to meet and work collaboratively to set policy for increasing mix-income housing

that is affordable and accessible for the residents of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna and Girdwood (Turnagain Arm).

The MOA did not successfully address the impediment #6 goals to educate the community councils about fair housing and promote fair housing awareness through Municipal channels. The Alaska Legal Services Corporation with their Fair Housing Initiatives Program grant award from HUD work to promote awareness of fair housing through the Municipal and community channels and address areas where fair housing is impeded.

c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

An outcome of the community outreach efforts is that the MOA's DHHS, Department of Public Transportation, Planning Department have begun to meet and work collaboratively to set policy for increasing mix-income housing that is affordable and accessible for the residents of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna and Girdwood (Turnagain Arm). These collaborative meetings will continue quarterly or twice a year and include Alaska Housing Finance Corporation in order for the MOA to be successful in achieving this goal in the AFH plan.

The MOA will collaborate within the MOA's DHHS, Anchorage's Equal Rights Commission, Ombudsman Office of Anchorage and the Alaska Legal Services Corporation to educate the community councils about fair housing and promote fair housing awareness through Municipal and other channels.

Anchorage has a continued need for fair housing information and training for tenants and landlords as the tenants and landlords transition in an out of residential properties. The MOA will continue to work with local and regional partners to provide coordinated training and enforcement of fair housing laws.

d. How has the experience by program participant with past goals influenced the selection of current goals?

The AFH plan's goal to address the fair housing contributing factors in the Municipality of Anchorage were identified after a review of HUD data, local data sources, comments during public meetings and events, public survey results, work sessions/interviews with partner agencies.

Contributing factors to fair housing issues in the Municipality of Anchorage include:

1. Availability of affordable and accessible units in a range of sizes
2. Lack of access to opportunity due to high housing costs
3. Displacement of residents due to economic pressures
4. Land use and zoning laws
5. Loss of affordable housing
6. Lack of assistance for housing accessibility modifications

7. Sources of income discrimination
8. Availability, type, frequency, and reliability of public transportation
9. Community opposition
10. Lack of local private fair housing outreach and enforcement

The contributing factors listed above are similar to the Analysis of Impediments to Fair Housing Choice in 2015 which are listed here:

1. Lack of knowledge of the classes of people protected by fair housing laws.
2. Low awareness of available fair housing enforcement mechanisms, caused at least in part by lack of fair housing advocacy organizations.
3. Financial barriers and lack of accessible housing stock limit housing opportunities for persons with disabilities.
4. Municipal regulations and various administrative policies, procedures and practices.
5. Lack of available affordable housing stock designed to meet the needs of people in one or more protected classes.
6. Neighborhood opposition to group housing, increased residential density and rental housing.

V. Fair Housing Analysis Section A. Demographic Summary

A. Demographic Summary

1. Describe demographic patterns in the Jurisdiction and Region, and describe trends over time (since 1990).

Race/Ethnicity	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction								(Anchorage, AK) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	178,132	78.69%	181,982	69.92%	182,814	62.64%	175,307	62.19%	214,570	80.65%	233,147	72.95%	256,490	67.35%	256,490	67.35%
Black, Non-Hispanic	14,096	6.23%	17,614	6.77%	20,587	7.05%	15,085	5.35%	14,379	5.40%	18,226	5.70%	22,072	5.80%	16,125	4.23%
Hispanic	9,227	4.08%	14,799	5.69%	22,061	7.56%	21,623	7.67%	15,982	6.01%	29,653	9.28%	25,362	6.66%	25,362	6.66%
Asian or Pacific Islander, Non-Hispanic	10,397	4.59%	19,829	7.62%	33,918	11.62%	28,184	10.00%	10,660	4.01%	20,663	6.46%	36,001	9.45%	30,273	7.95%
Native American, Non-Hispanic	14,095	6.23%	24,801	9.53%	31,759	10.88%	21,623	7.67%	9,969	3.75%	16,275	5.09%	40,050	10.52%	26,782	7.03%
National Origin																
Foreign-born	13,359	5.90%	21,278	8.17%	26,273	9.00%	27,759	9.51%	14,128	5.31%	22,801	7.13%	28,964	7.61%	30,884	8.11%
LEP																
Limited English Proficiency	7,596	3.36%	12,710	4.88%	16,750	5.74%	17,000	5.83%	8,022	3.02%	13,535	4.23%	17,802	4.67%	18,440	4.84%
Sex																
Male	116,381	51.42%	131,672	50.59%	143,205	50.80%	143,205	50.80%	136,974	51.49%	162,625	50.88%	194,249	51.01%	194,249	51.01%
Female	109,957	48.58%	128,611	49.41%	138,701	49.20%	138,701	49.20%	129,047	48.51%	156,980	49.12%	186,572	48.99%	186,572	48.99%
Age																
Under 18	66,415	29.34%	77,597	29.81%	73,288	26.00%	73,288	26.00%	80,186	30.14%	97,168	30.40%	101,505	26.65%	101,505	26.65%
18-64	151,809	67.07%	168,832	64.86%	188,452	66.85%	188,452	66.85%	175,861	66.11%	205,118	64.18%	251,108	65.94%	251,108	65.94%
65+	8,114	3.58%	13,854	5.32%	20,166	7.15%	20,166	7.15%	9,974	3.75%	17,319	5.42%	28,208	7.41%	28,208	7.41%
Family Type																
Families with children	34,600	60.15%	36,868	57.49%	34,320	50.60%	34,320	50.60%	41,074	60.56%	41,152	57.45%	46,838	50.30%	46,838	50.30%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.
Note 2: Data Sources: Decennial Census; ACS
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

According to the 2010 U.S. Census, the geographic area of the communities of the Municipality has a total land area of 1,704.68 square miles and includes the Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna and Girdwood (Turnagain Arm). The Municipality of Anchorage is

considered a county under the U.S. Census Bureau, and is identified as a unified home rule municipality, which means city government and borough governments are merged. Anchorage is the northern most major city in the United States. According to the U.S. Census Bureau, the estimated population in 2016 of the Municipality of Anchorage was 299,037 residents and the Mat-Su Borough was 102,598. Anchorage is the largest city in Alaska and constitutes approximately 41% of the State's total population. Anchorage ranks 30th among 366 metropolitan areas in the diversity index and is fifth among medium-sized U.S. cities.

The HUD table 2 Demographic Trends for Anchorage in 1990 the race/ethnicity are White 78.69%, Black 6.23%, Hispanic 4.08%, Asian or Pacific Islander 4.59%, and Native American 6.23%.

The HUD table 2 Demographic Trends for Anchorage in 2000 and 2010 the race/ethnicity for all groups increases with the exception of White that decreases. Anchorage in 2010 the race/ethnicity groups are White 62.64%, Black 7.05%, Hispanic 7.56%, Asian or Pacific Islander 11.62%, and Native American 10.88%.

In HUD table 2 Demographic Trends for Anchorage currently the race/ethnicity for Hispanic continues to increase while all other groups decreased. Anchorage currently the race/ethnicity groups are White 62.19%, Black 5.35%, Hispanic 7.67%, Asian or Pacific Islander 10.00%, and Native American 7.67%.

In HUD table 2 Demographic Trends for Anchorage, foreign-born population increases from 1990 to the current year; 1990 5.90%, 2010 9.00% and current 9.51%. For Anchorage, limited English proficiency population increases from 1990 to the current year; 1990 3.36%, 2010 5.74% and current 5.83%.

In HUD table 2 Demographic Trends for Anchorage, families with children population decreases from 1990 to the current year; 1990 60.15%, 2010 50.60% and current 50.60%.

The HUD table 2 Demographic Trends for the Region in 1990 the race/ethnicity are White 80.65%, Black 5.40%, Hispanic 6.01%, Asian or Pacific Islander 4.01%, and Native American 3.75%.

The HUD table 2 Demographic Trends for the Region in 2000 and 2010 the race/ethnicity for all groups increases with the exception of White that decreases. The Region in 2010 the race/ethnicity groups are White 67.35%, Black 5.80%, Hispanic 6.66%, Asian or Pacific Islander 9.45%, and Native American 10.52%.

In HUD table 2 Demographic Trends for the Region currently the race/ethnicity for White and Hispanic remained the same while all other groups decreased. The Region currently the race/ethnicity groups are White 67.35%, Black 4.23%, Hispanic 6.66%, Asian or Pacific Islander 7.95%, and Native American 7.03%.

In HUD table 2 Demographic Trends for the Region, foreign-born population increases from 1990 to the current year; 1990 5.31%, 2010 7.61% and current 8.11%. For the Region, limited

English proficiency population increases from 1990 to the current year; 1990 3.02%, 2010 4.67% and current 4.84%.

In HUD table 2 Demographic Trends for the Region, families with children population decreases from 1990 to the current year; 1990 60.56%, 2010 50.30% and current 50.30%.

V. Fair Housing Analysis Section B. General Issues

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the Jurisdiction and Region. Identify the race/ethnic groups that experience the highest levels of segregation.

See HUD maps 1 Race/Ethnicity and 2 Race/Ethnicity Trends for Anchorage in Appendix A.

Racial/Ethnic Dissimilarity Index	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction				(Anchorage, AK) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	23.49	26.38	26.71	31.37	27.28	30.18	31.69	35.58
Black/White	34.83	35.92	34.33	39.07	39.39	42.38	41.25	46.55
Hispanic/White	20.78	25.92	24.82	27.71	23.80	29.01	29.10	31.04
Asian or Pacific Islander/White	24.81	29.14	30.79	38.97	30.94	35.62	40.49	46.41

Note 1: Data Sources: Decennial Census
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

The dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicated a higher degree of segregation among the two groups measured. Because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups. Any dissimilarity level that is below 40 represents a low level of segregation. Dissimilarity levels between 40 and 54 represent a moderate level of segregation and levels over 55 indicate a high level of segregation.

The dissimilarity index for Anchorage has a low segregation level for all four race/ethnic populations over the 20 year period between 1990 and 2010. Any dissimilarity index that is below 40 represents a low level of segregation. The 20 year trend for Anchorage has an increase for the four race/ethnic dissimilarity indexes but still a low segregation value. The highest level of segregation is between Black and White at 39.07. The second highest level of segregation is between Asian or Pacific Islander and White at 38.97. The third highest level of segregation is between Non-White and White at 31.37. The fourth highest level of segregation is between Hispanic and White at 27.71.

The dissimilarity index for the Region has a low segregation level for all four race/ethnic populations in 1990. Over the 20 year period between 1990 and 2010, two race/ethnic populations increased but remained a low level of segregation, Hispanic and Non-White. Over the 20 year period between 1990 and 2010, two race/ethnic populations increased to a moderate level of segregation, Asian or Pacific Islander and Black. Currently the highest level of segregation is between Black and White at 46.55. The second highest level of segregation is between Asian or Pacific Islander and White at 46.41. The third highest level of segregation is between Non-White and White at 35.58. The fourth highest level of segregation is between Hispanic and White at 31.04.

b. Identify areas in the Jurisdiction and Region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

See HUD maps 1 Race/Ethnicity, 2 Race/Ethnicity Trends and 12 Demographics and Poverty for Anchorage and the Region in Appendix A.

HUD Table 4 - R/ECAP Demographics						
	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction			(Anchorage, AK) Region		
R/ECAP Race/Ethnicity		#	%		#	%
Total Population in R/ECAPs		7,747	-		7,747	-
White, Non-Hispanic		1,860	24.01%		1,860	24.01%
Black, Non-Hispanic		985	12.71%		985	12.71%
Hispanic		921	11.89%		921	11.89%
Asian or Pacific Islander, Non-Hispanic		2,005	25.88%		2,005	25.88%
Native American, Non-Hispanic		1,238	15.98%		1,238	15.98%
Other, Non-Hispanic		12	0.15%		12	0.15%
R/ECAP Family Type						
Total Families in R/ECAPs		1,470	-		1,470	-
Families with children		933	63.47%		933	63.47%
R/ECAP National Origin						
Total Population in R/ECAPs		7,747	-		7,747	-
#1 country of origin	Dominican Republic	163	2.10%	Dominican Republic	163	2.10%
#2 country of origin	Philippines	154	1.99%	Philippines	154	1.99%
#3 country of origin	Other South Central Asia	111	1.43%	Other South Central Asia	111	1.43%
#4 country of origin	Thailand	111	1.43%	Thailand	111	1.43%
#5 country of origin	Nepal	79	1.02%	Nepal	79	1.02%
#6 country of origin	Honduras	70	0.90%	Honduras	70	0.90%
#7 country of origin	Laos	66	0.85%	Laos	66	0.85%
#8 country of origin	Other Australia & New Zealand	56	0.72%	Other Australia & New Zealand	56	0.72%
#9 country of origin	Guatemala	48	0.62%	Guatemala	48	0.62%
#10 country of origin	Grenada	40	0.52%	Grenada	40	0.52%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 2: Data Sources: Decennial Census; ACS						
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).						

HUD table 4 R/ECAP Demographics identifies one R/ECAP area, the neighborhoods of Mountain View/Government Hill. Mountain View/Government Hill neighborhood is in 2010 Census Tract 6 with a total population of 7,747 and a White population of 1,860 (24%).

Anchorage's neighborhoods are unique because they include members of all seven demographic categories/groups recognized by the government, White, Black, Hispanic/Latino, Alaska Native/American Indian, mixed race, Asian and Native Hawaiian/Pacific Islander in large numbers. The diversity index is defined as the race/ethnic groups in a Jurisdiction or Region. The more equally sized they are then the more demographic diversity you have in an area. The trend in Anchorage has been toward less segregation based on race/ethnicity with the exception of the six census tracts with high minority populations noted in the following paragraph.

HUD map 1 Race/Ethnicity indicates that Anchorage has a low level of segregation. In viewing the map, it is estimated that Anchorage has six census tracts located in the north area of the city that have high concentration (less than 45% of White population) of minority populations. The census tracts are 6 (Mountain View/Government Hill), 7.02 and 7.03 (Northeast), 8.01 and 8.02 (Russian Jack), 9.01 (Airport Height). There are no census tracts in HUD map 1 for Eagle River, Chugiak, Peters Creek, Eklutna, Girdwood (Turnagain Arm) and the Region

c. Explain how these segregation levels and patterns in the Jurisdiction and Region have changed over time (since 1990).

Dissimilarity trends between 1990 and current year on HUD table 3 indicate that the segregation in Anchorage has remained low for all race/ethnicity. The dissimilarity index levels in Anchorage appears to have an upward trend. The dissimilarity between Non-white and White populations has increased by about a third from 23.49 in 1990 to 31.37 in current year. The dissimilarity between Black, Hispanic and Asian or Pacific Islander populations has increase by about a third or less in 1990 to current year.

Dissimilarity trends between 1990 and current year on HUD table 3 indicate that the segregation in the Region has remained low in two race/ethnicity populations and increased to moderate in two race/ethnicity populations. The dissimilarity index identifies that all race/ethnicity population in the Region appears to have upward trends. The dissimilarity between Non-white and White populations has increased by about a third from 27.28 in 1990 to 35.58 in current year. The dissimilarity between Black, Hispanic and Asian or Pacific Islander populations has increase by about a third or less in 1990 to current year. The dissimilarity index between Black and White populations is the highest level at 46.55 for current year. The dissimilarity index between Asian or Pacific Islander populations is the second highest level at 46.41 for current year.

HUD map 2 Race/Ethnicity Trends identifies that Anchorage has become a more diversified city from 1990 through 2010. The Municipality's communities of Eagle River, Chugiak, Peters Creek, Eklutna and the Region have even become more diversified communities from 1990 averaging 90+% White populations compared to 2010 averaging 80+% White populations.

d. Consider and describe the location of owner and renter occupied housing in Jurisdiction and Region in determining whether such housing is located in segregation or integration areas, and describe trends over time.

In viewing the HUD map 1 Race/Ethnicity, it is estimated that Anchorage has six census tracts located in the north area of the city that have high concentration (less than 45% of White population) of minority populations. The census tracts are 6 (Mountain View/Government Hill), 7.02 and 7.03 (Northeast), 8.01 and 8.02 (Russian Jack), 9.01 (Airport Height). These neighborhoods of concentrated race/ethnicity populations are zoned high density residential and contain older single family homes, multifamily housing developments, and mobile home parks.

In 2010 Census Tract 6, the neighborhoods of Mountain View/Government Hill, 18% of the residents live in owner occupied housing and 82% of the residents live in renter occupied housing.

Minority residents living in many of the neighborhoods throughout Anchorage which reflect the diversity of the population. The low concentration of minority residents are easily identified as in the business districts with low residential housing or the upper Hillside or Prospect Heights neighborhoods that have low density housing.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the Jurisdiction in the future.

According to the U.S. Census Bureau, the estimated population in 2016 of the Municipality of Anchorage was 299,037 residents and the Mat-Su Borough was 102,598. Anchorage is the largest city in Alaska and constitutes approximately 41% of the State's total population. Anchorage ranks 30th among 366 metropolitan areas in the diversity index and is fifth among medium-sized U.S. cities. The HUD table 2 Demographic Trends for Anchorage in 1990 and 2010 show that the race/ethnicity for all groups increases with the exception of White population which decreases. Anchorage in 2010 the race/ethnicity populations are White 62.64%, Black 7.05%, Hispanic 7.56%, Asian or Pacific Islander 11.62%, and Native American 10.88%.

In January 2016, the Alaska Department of Labor and Workforce Development showed that Mat-Su Borough had broken through the 100,000 ceiling population, surpassing Fairbanks sometime in 2015 as the second largest community in Alaska. The HUD table 2 Demographic Trends for the Region in 1990 and 2010 the race/ethnicity for all groups increases with the exception of White population that decreases. The Region in 2010 the race/ethnicity populations are White 67.35%, Black 5.80%, Hispanic 6.66%, Asian or Pacific Islander 9.45%, and Native American 10.52%.

Both Anchorage and the Region's populations are experiencing an increase in all race/ethnicity groups with the exception of White population that is decreasing. The Anchorage neighborhoods that are identified as having higher minority populations appear to be in neighborhoods with numerous low-rent houses, apartments, mobile home parks and older housing units. These neighborhoods are also located with many resources such as employment options, proficient schools, public transportation and services.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the Jurisdiction and Region affecting groups with other protected characteristics.

The Municipality's Planning Department, Anchorage 2040 Land Use Plan was adopted by MOA in February 2016. The plan's key growth strategies include housing and neighborhoods as defined as providing a diverse supply of affordable, quality housing that meets the needs and preferences of the city's residents, at all income levels, in safe and livable neighborhoods. The strategies are:

1. Balanced regional growth
2. Infill and redevelopment
3. Centers and corridors
4. Housing and neighborhoods
5. Coordinated and focused public investment
6. Land use - transportation coordination
7. Industrial land prioritization
8. Compatible land use
9. Open space and greenbelts
10. Anchor institutions and facilities

The Anchorage 2040 Land Use Plan identified that housing of all types and sizes are needed in order to provide a range of housing opportunities for all residents. The 2012 Anchorage Housing Market Analysis identified that the remaining supply of vacant buildable lands in the Anchorage area must be more efficiently developed. Housing will need to be more "compact" in form if there is to be enough housing to meet future need. This compact form includes small-lot "cottage" homes, accessory dwellings where appropriate, attached dwellings (duplex and triplex), townhouses, multifamily, and residential units built as part of commercial developments (mixed-use).

The 2012 Anchorage Housing Market Analysis and HUD maps and tables showed that seniors and minority populations as the fastest growing population groups, desire compact housing that is located near services, jobs, transportation, and parks and trails. Anchorage's inadequate housing supply makes affordable and accessible housing an important priority for the MOA to redirect near term resources, actions, and solutions to address housing needs.

b. The program participant may also describe other information relevant to its assessment of segregation including activities such as place-based investment and geographic mobility options for protected class groups.

Anchorage has no place-based investments and mobility options for specific protected class groups other than for persons who live in public housing or have a Housing Choice Voucher who are trying to move.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the Jurisdiction and Region. Identify any factors that significantly create, contribute to, perpetuate or increase the severity of segregation.

- Community opposition
- **Displacement of residents due to economic pressures**
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- **Loss of affordable housing**
- Occupancy codes and restrictions
- Private discrimination
- **Source of income discrimination**
- Other

Segregation in Anchorage while increasing remains low based on the HUD provided tables and maps. The neighborhoods that have high levels of both low-income and race/ethnicity populations appear to be located where the cost of rental housing has remained lower. Some of these neighborhoods have older homes and mobile home parks that are sometimes lost because of being replaced by higher cost condominiums. Affordable housing units are also located in neighborhoods that do not have concentrations of poverty or race/ethnicity populations. Some income segregation may be occurring as low-income residents cannot afford the high rent and high income neighborhoods in Anchorage.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the Jurisdiction and Region.

HUD calculates a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) neighborhood based on the 2010 Census Tract data. R/ECAP is a census tract where at least 50% of the population is non-White and/or Hispanic and has an income threshold that looks at the poverty rate. The poverty rate on that census tract has to be either 40% or more or three times the rate of the poverty rate for Anchorage as a whole.

HUD Table 4 - R/ECAP Demographics					
	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction			(Anchorage, AK) Region	
R/ECAP Race/Ethnicity		#	%	#	%
Total Population in R/ECAPs		7,747	-	7,747	-
White, Non-Hispanic		1,860	24.01%	1,860	24.01%
Black, Non-Hispanic		985	12.71%	985	12.71%
Hispanic		921	11.89%	921	11.89%
Asian or Pacific Islander, Non-Hispanic		2,005	25.88%	2,005	25.88%
Native American, Non-Hispanic		1,238	15.98%	1,238	15.98%
Other, Non-Hispanic		12	0.15%	12	0.15%
R/ECAP Family Type					
Total Families in R/ECAPs		1,470	-	1,470	-
Families with children		933	63.47%	933	63.47%
R/ECAP National Origin					
Total Population in R/ECAPs		7,747	-	7,747	-
#1 country of origin	Dominican Republic	163	2.10%	Dominican Republic	163 2.10%
#2 country of origin	Philippines	154	1.99%	Philippines	154 1.99%
#3 country of origin	Other South Central Asia	111	1.43%	Other South Central Asia	111 1.43%
#4 country of origin	Thailand	111	1.43%	Thailand	111 1.43%
#5 country of origin	Nepal	79	1.02%	Nepal	79 1.02%
#6 country of origin	Honduras	70	0.90%	Honduras	70 0.90%
#7 country of origin	Laos	66	0.85%	Laos	66 0.85%
#8 country of origin	Other Australia & New Zealand	56	0.72%	Other Australia & New Zealand	56 0.72%
#9 country of origin	Guatemala	48	0.62%	Guatemala	48 0.62%
#10 country of origin	Grenada	40	0.52%	Grenada	40 0.52%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.					
Note 2: Data Sources: Decennial Census; ACS					
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).					

The HUD map 1 Race/Ethnicity, map 3 National Origin, and table 4 R/ECAP Demographics for Anchorage has identified one R/ECAP, the Mountain View/Government Hill neighborhoods. A reason why Mountain View ranks as so diverse may not seem intuitive at first. People from around the world live there but a significant percentage (24%) of White residents also live there. Government Hill neighborhood has very few residential housing since it is mostly occupied by the Ship Creek neighborhood that is industrial land operated by the railroad and Port of Anchorage.

The HUD maps and table has identified no R/ECAPs in the Region.

b. Describe and identify the predominant protected classes residing in R/ECAPs in the Jurisdiction and Region. How do these demographics of the R/ECAPs compare with the demographics of the Jurisdiction and Region?

In the R/ECAP neighborhoods of Mountain View/Government Hill, 7,747 residents live in these neighborhoods. HUD table 4 R/ECAP Demographics data identifies that the highest race/ethnicity population in the R/ECAP are Asian or Pacific Islander at 25.88% compared to the total 11.62% of Anchorage’s Asian or Pacific Islander population. White residents are 24.01% compared to the total 62.64% of Anchorage’s White population. Native American residents are 15.98% compared to the total 10.88% of Anchorage’s Native American population. Black residents are 12.71% compared to the total 7.05% of Anchorage’s Black population. Hispanic residents are 11.89% compared to the total 7.56% of Anchorage’s Hispanic population.

The HUD table 4 reflects the diversity in the R/ECAP neighborhoods' national origin. The Dominican Republic (2.10%) as the highest number of residents in Mountain View/Government Hill neighborhoods from this national origin. Other residents in these neighborhoods identify their national origin as Philippines (1.99%), Other South Central Asia (1.43%), Thailand (1.43%), Nepal (1.02%), Honduras (.90%), Laos (.85%), Other Australia & New Zealand (.72%), Guatemala (.62%) and Grenada (.52%).

Additional comparisons to the R/ECAP neighborhood and Anchorage are contained in the sections below.

The HUD maps and table has identified no R/ECAPs in the Region.

c. Describe how R/ECAPs have changed over time in the Jurisdiction and Region (since 1990).

The R/ECAP neighborhood of Mountain View has received a consistent public investment in infrastructure and public facilities in an effort to improve the neighborhood. The R/ECAP neighborhoods of Mountain View/Government Hill are located with many resources such as employment options, proficient schools, public transportation and services.

The Mountain View Targeted Neighborhood Plan was officially adopted by the Municipal Assembly on September 13, 2016. Mountain View is becoming a community of choice due to the hard work of residents and community leaders who are catalyzing transformation. In a 2012 study (the Mountain View Community Indicators Report), 57% of respondents living in the neighborhood rated Mountain View as an excellent place to live. Families are staying to raise their children and the children are doing better in school. Residents feel revitalization efforts are strengthening the community and are headed in the right direction. Always known as a neighborhood for working-class families, the neighborhood is starting to now work for all kinds of families.

In the 1990s this was not always the case for Mountain View has experienced the opposite. The Mountain View poverty rate climbed steadily from 7.5% in 1970 to 16.2% in 1980 to 23.3% in 1990 to 25.1% in 2000. In 2010, Mountain View had a poverty rate of 24.3%. The citywide poverty rate remained roughly 7% throughout this entire period. While the portion of residents experiencing poverty five years before each census increased from 22% in 1970 to 57.3% in 2010 for Anchorage as a whole, for Mountain View during the same time period that proportion increased at a slower rate from 20% to 40.8%. While the proportion of residents without a high school diploma decreased for the city as a whole from 12% in 1980 to 8.1% in 2010, for Mountain View during the same time period that proportion increased from 22% to 32%.

Mountain View continues to have a much higher crime rate, when adjusted for population size, than Anchorage as a whole. The Anchorage Police Department Annual Statistical Report from 2010 reveals alarming rates of reported homicide, sexual assaults, missing persons, assaults, and theft when compared to Anchorage as a whole. This report indicates that in 2010, 23.5% of Anchorage homicides occurred in Mountain View, as did 19.3% of thefts; 18.5% of the city's missing persons cases were reported from Mountain View, as were 32.4% of reported assaults.

The Anchorage Police Department (APD) became a major partner in Mountain View through a Weed N 'Seed Department of Justice grant that was active from 2006-2011. Over time patrols in the community, paid for by \$230,000 of the grant, increased law enforcement presence in the community. Through this program, APD saw a positive change in the community.

Over the last decade, revitalization efforts have brought new investment into Mountain View. New businesses, such as Bass Pro Shops as the anchor for other businesses, continue to enter the neighborhood, and existing businesses have been reinvesting in Mountain View by remodeling their exteriors. Housing developers, such as Cook Inlet Housing Authority, NeighborWorks, and Habitat for Humanity, have collectively invested over \$100 million in Mountain View's Housing Stock. Between 2003 and 2014, over 10% of Mountain View's housing stock, and a substantial amount of its commercial and retail spaces, have been redeveloped.

The Municipality of Anchorage rebuilt Clark Middle School and built the Mountain View branch library. Along with the new branch of Credit Union 1, those institutions have brought valuable services to the community. The State of Alaska's new Glenn Highway - Bragaw Street overpass connected Mountain View with the rest of the Anchorage. Redevelopment of the commercial corridor, through the Anchorage Community Land Trust's work and private investors such as JL Properties, which owns the Glenn Square Mall, has removed blight and created commercial activity in formerly vacant spaces. Reinvestment fostered by these partnerships has brought Mountain View a long way in the last decade.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the Jurisdiction and Region affecting groups with other protected characteristics.

The HUD table 4 R/ECAP Demographics, the neighborhoods of Mountain View/Government Hill identifies that the 76% of the population are other race/ethnicity than at White 24%. The HUD table 4 reflects the diversity in the R/ECAP neighborhoods' national origin with the Dominican Republic (2.10%) as the highest number of residents.

The R/ECAP neighborhood of Mountain View has received a consistent public investment in infrastructure and public facilities in an effort to improve the neighborhood. These neighborhoods are located with many resources such as employment options, proficient schools, public transportation and services.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.

Anchorage has no place-based investments and mobility options for specific protected class groups other than for residents who live in public housing or have a Housing Choice Voucher who are trying to move.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the Jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community opposition
- Deteriorated and abandoned properties
- **Displacement of residents due to economic pressures**
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- **Land use and zoning laws**
- Location and type of affordable housing
- **Loss of affordable housing**
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Anchorage has income segregated housing patterns. The high demand for housing in Anchorage and in the Region is causing displacement of low-income residents including protected classes of residents due to economic pressures and loss of affordable housing due to re-development. As a result, land use, zoning and occupancy restrictions can have a significant impact on the Anchorage segregated housing patterns. Housing development has to be affordable if rent and home ownership are going to be affordable for low and moderate-income residents for all race/ethnicity.

Land that is available to develop or re-develop in Anchorage is limited. Land use and zoning need to support mixed-income housing development if Anchorage is going to address income segregated housing patterns. Occupancy restrictions can help or inhibit the housing development of higher density housing which can reduce the cost of housing development. Family size may be influenced by the ethnicity of the parents so there is a need for housing development with 3 or more bedrooms that is affordable for rent or home ownership.

Some neighborhoods in Anchorage oppose changes in land use, zoning and occupancy restrictions that result in these neighborhoods not being areas to develop or re-develop affordable housing for moderate to low-income residents. For example, when a neighborhood does not have access to municipal water and sewer in their neighborhood, housing development costs increase due to the cost of including a water well and septic systems.

iii. Disparities in Access to Opportunities

1. Analysis

a. Education

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the Jurisdiction and Region.

There is one school district in the Municipality, the Anchorage School District, who manages and operates 59 elementary schools. Anchorage public schools lead the nation in diversity. The nation’s 19 most diverse elementary schools are in Anchorage, led by Wonder Park, North Star, Airport Heights, Russian Jack, Ptarmigan and Mountain View (located in the R/ECAP).

The Anchorage School District manages and operates 11 middle and 9 high schools. Anchorage public schools lead the nation in diversity. Among public high schools, East, Bartlett and West are the three most diverse in the nation. Even Anchorage’s less diverse schools score in the top 1% nationally. At middle school level, Clark ranked first nationally, followed by Begich, Wendler and Romig. Central and Hanshew were ranked sixth and seventh.

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction							
Total Population							
White, Non-Hispanic	75.95	70.08	68.30	47.06	71.29	45.77	28.09
Black, Non-Hispanic	61.75	61.58	52.46	54.18	79.12	49.00	23.36
Hispanic	66.52	65.12	58.03	52.19	77.41	48.49	22.45
Asian or Pacific Islander, Non-Hispanic	61.74	62.44	58.48	55.47	80.04	45.07	15.65
Native American, Non-Hispanic	62.69	63.32	58.21	54.19	79.09	49.42	17.58
Population below federal poverty line							
White, Non-Hispanic	63.48	63.99	59.11	53.66	78.52	48.92	19.64
Black, Non-Hispanic	50.84	53.90	45.98	58.93	82.32	45.83	19.48
Hispanic	58.52	64.03	55.10	54.31	81.84	54.02	12.39
Asian or Pacific Islander, Non-Hispanic	43.16	55.75	38.66	58.35	84.08	47.25	16.92
Native American, Non-Hispanic	55.72	59.79	53.33	56.88	82.49	52.62	13.32
(Anchorage, AK) Region							
Total Population							
White, Non-Hispanic	71.92	70.08	58.72	39.03	61.26	45.77	34.34
Black, Non-Hispanic	61.70	61.58	51.59	52.61	77.07	49.00	24.30
Hispanic	65.90	65.12	55.00	48.02	72.17	48.49	24.88
Asian or Pacific Islander, Non-Hispanic	61.75	62.44	57.53	53.91	78.22	45.07	16.72
Native American, Non-Hispanic	62.13	63.32	53.65	48.05	71.64	49.42	21.33
Population below federal poverty line							
White, Non-Hispanic	60.82	66.98	47.59	38.30	61.59	49.89	28.90
Black, Non-Hispanic	51.11	54.70	45.49	57.54	80.66	46.33	19.48
Hispanic	58.73	65.61	52.60	50.35	76.41	55.32	15.17
Asian or Pacific Islander, Non-Hispanic	43.78	56.57	38.73	56.82	82.83	47.99	18.29
Native American, Non-Hispanic	57.39	63.38	48.78	48.68	72.84	52.60	16.82
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).							

In HUD table 12 Opportunity Indicators by Race/Ethnicity the School Proficiency Index measurements are based on test scores of 4th grade students. A review of HUD table 12 reveals that the Anchorage population’s school proficiency index has all race/ethnicity above 60 with a high of 70.08 for White and a low of 61.58 for Black. The Region population’s school proficiency index has all race/ethnicity above 60 with a high of 70.08 for White and a low of 61.58 for Black. The Anchorage and Region populations’ school proficiency indexes for race/ethnicity are the same.

A review of HUD table 12 reveals that the Anchorage population's school proficiency index has all race/ethnicity below the federal poverty level are above 50 with a high of 64.03 for Hispanic and a low of 53.90 for Black. The Region population's school proficiency index has all race/ethnicity below the federal poverty level are above 50 with a high of 66.98 for White and a low of 54.70 for Black.

ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the Jurisdiction and Region.

As indicated by the higher proficiency by all race/ethnicity in Anchorage and the Region, all race/ethnicity including those living below the federal poverty line have access to proficient schools. The HUD map 7 Demographics and School Proficiency identifies that all race/ethnicity in Anchorage live in close proximity to proficient schools.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

The Anchorage School District's newcomer center is located at Wendler Middle School where students from other countries spend their first days in the district. The center is staffed with English teachers who work with students struggling to learn a new language. Approximately 20% of the district's population has either been in the English Language Learners (ELL) program or is currently in it.

Among the ELL students in the Anchorage School District, 23% report Spanish as their first language, followed by Hmong (18%), Samoan (17%), Filipino (13%) and Yup'ik (5%). Lao, Inupiaq, Nuer, Korean and Russian round out the top 10 languages. These are the most common languages but the Anchorage School District has students who speak 99 different languages other than English. The Anchorage School District doesn't only teach English to students, the district offers free beginner and intermediate level adult English classes. To communicate with non-English speaking parents, the Anchorage School District has three main sources for interpreters.

If a parent or guardian feels that a school other than the neighborhood school would be a better fit for their child, there are a lot of different options. The Anchorage School District has an open enrollment policy for students who attend a school outside their regular attendance areas. A lottery system is used to provide an equal opportunity for students who request participation in an alternative school or program. Lotteries are held twice a year.

Alternative schools at the elementary level include ABC (Anchorage Basic Curriculum) schools that use a back-to-basic approach, a Montessori school with a child-centered focus and Open Optional schools that recognize individual strengths, needs and interests.

At the middle and high school levels, alternative programs offer a variety of choices from a science focus, to International Baccalaureate, to programs for at-risk teens and many other choices in between.

Charter schools are public schools that offer alternative teaching methods or curriculum. They operate under a contract with the district and have more independence than neighborhood schools.

b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the Jurisdiction and Region.

The University of Alaska Anchorage, Institute of Social and Economic Research (ISER), reports that Alaska’s jobs are concentrated in a few areas, with jobs in the Anchorage and adjoining Mat-Su Borough, making up more than half of all jobs in the State at 53% in 2014. The definition of jobs means employment that pays wages or salaries. Therefore, jobs do not include the active-duty military personnel in Anchorage working at Joint Base Elmendorf-Richardson (JBER) and the self-employed people, including fisherman. In 2014, about 76% of wage and salary jobs were in the private industry. Government jobs, including local governments and school districts, account for about 11.5% of jobs. State jobs account for 8% and federal jobs 4.5%. From March 2014 to March 2016 Anchorage lost 1% or 1,485 jobs while Mat-Su Borough gained 5% or 1,133 jobs.

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction							
Total Population							
White, Non-Hispanic	75.95	70.08	68.30	47.06	71.29	45.77	28.09
Black, Non-Hispanic	61.75	61.58	52.46	54.18	79.12	49.00	23.36
Hispanic	66.52	65.12	58.03	52.19	77.41	48.49	22.45
Asian or Pacific Islander, Non-Hispanic	61.74	62.44	58.48	55.47	80.04	45.07	15.65
Native American, Non-Hispanic	62.69	63.32	58.21	54.19	79.09	49.42	17.58
Population below federal poverty line							
White, Non-Hispanic	63.48	63.99	59.11	53.66	78.52	48.92	19.64
Black, Non-Hispanic	50.84	53.90	45.98	58.93	82.32	45.83	19.48
Hispanic	58.52	64.03	55.10	54.31	81.84	54.02	12.39
Asian or Pacific Islander, Non-Hispanic	43.16	55.75	38.66	58.35	84.08	47.25	16.92
Native American, Non-Hispanic	55.72	59.79	53.33	56.88	82.49	52.62	13.32
(Anchorage, AK) Region							
Total Population							
White, Non-Hispanic	71.92	70.08	58.72	39.03	61.26	45.77	34.34
Black, Non-Hispanic	61.70	61.58	51.59	52.61	77.07	49.00	24.30
Hispanic	65.90	65.12	55.00	48.02	72.17	48.49	24.88
Asian or Pacific Islander, Non-Hispanic	61.75	62.44	57.53	53.91	78.22	45.07	16.72
Native American, Non-Hispanic	62.13	63.32	53.65	48.05	71.64	49.42	21.33
Population below federal poverty line							
White, Non-Hispanic	60.82	66.98	47.59	38.30	61.59	49.89	28.90
Black, Non-Hispanic	51.11	54.70	45.49	57.54	80.66	46.33	19.48
Hispanic	58.73	65.61	52.60	50.35	76.41	55.32	15.17
Asian or Pacific Islander, Non-Hispanic	43.78	56.57	38.73	56.82	82.83	47.99	18.29
Native American, Non-Hispanic	57.39	63.38	48.78	48.68	72.84	52.60	16.82
<small>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</small>							

HUD table 12 Opportunity Indicators by Race/Ethnicity the Labor Market Engagement Index provides a measure of the unemployment rate, labor force participation rate and the percent of the population age 25 and above with at least a bachelor's degree, by neighborhood. The Labor Market Index in HUD table 12 for the total population identifies a slightly better labor market engagement in Anchorage than in the Region for all protected classes. The White population in Anchorage has the highest labor market index at 68.30 and the Black population has the lowest index at 52.46. The Anchorage's labor market indexes for the Asian or Pacific Islander population is 58.48, Native American population is 58.21 and Hispanic population is 58.03. The HUD map 8 Demographics and Labor Market identifies job options located near main roads and public transit access.

The Labor Market Index in HUD table 12 identifies the White population in the Region has the highest labor market index at 58.72 and the Black population has the lowest index at 51.59. The Region's labor market indexes for the Asian or Pacific Islander population is 57.53, Hispanic population is 55.00 and Native American population is 53.65.

The White population below the federal poverty level in Anchorage has the highest labor market index at 59.11 and the Asian or Pacific Islander population has the lowest index at 38.66. The Anchorage's labor market indexes for the Hispanic population is 55.10, Native American population is 53.33 and Black population is 45.98.

The Hispanic population below the federal poverty level in the Region has the highest labor market index at 52.60 and the Asian or Pacific Islander population has the lowest index at 38.73. The Region's labor market indexes for the Native American population is 48.78, White population is 47.59 and Black population is 45.49.

The Jobs Proximity Index in HUD table 12 for the total population identifies Anchorage and the Region as the same proximity to jobs for all protected classes. The Native American population has the highest proximity to jobs at 49.42 and the Asian or Pacific Islander population has the lowest index at 45.07. The Anchorage and Region's job proximity indexes for the Black population is 49.00, Hispanic population is 48.49 and White is 45.77.

The Hispanic population below the federal poverty level in Anchorage has the highest job proximity index at 54.02 and the Black population has the lowest index at 45.83. The Anchorage's job proximity indexes for the Native American population is 52.62, White population is 48.92 and Asian or Pacific Islander population is 47.25. The HUD map 8 Demographics and Job Proximity identifies job options located near main roads and public transit access.

The Hispanic population below the federal poverty level in the Region has the highest job proximity index at 55.32 and the Black population has the lowest index at 46.33. The Region's job proximity indexes for the Native American population is 52.60, White population is 49.89 and Asian or Pacific Islander population is 47.99.

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment related to residential living patterns in the Jurisdiction and Region.

Distance from a potential employer can limit options for persons applying for jobs. Reliable transportation in the form of a personal vehicle or reliable public transit options often is a determining factor as to whether a person will apply for a job at all. Travel time to work using a personal vehicle or public transportation requires time and money. For low-income residents reliable public transit decides which neighborhood they can afford to live in.

Jobs are concentrated in downtown and midtown Anchorage. The R/ECAP neighborhoods of Mountain View/Government Hill are located beside the downtown Anchorage. These neighborhoods would have access to public transit since the main bus terminal is located in downtown Anchorage. There are few jobs concentrated east of Boniface, west of Minnesota and south of O'Malley roads. From north Anchorage, downtown to south Dimond road, jobs seem to be more concentrated along the main roads with public transit, such as Arctic, C Street and Old Seward. Public transit routes along Arctic frequency is every 30 minutes and C Street and Old Seward is every 60 minutes.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participation's own local data and local knowledge, discuss whether there are programs, policies or funding mechanisms that affect disparities in access to employment.

According to the most recent American Community Survey data, the Mountain View neighborhood suffers from an unemployment rate of 22%, over three times the city average. Particularly hard hit by unemployment are the Polynesian and Alaska Native communities as well as younger workers more generally. Recognizing the gravity of the situation, in 2016, Anchorage Community Land Trust (ACLT) partnered with the Mountain View Branch Library, the Alaska Department of Labor, and the Municipality of Anchorage, to facilitate biannual job fairs in the neighborhood as well host a Department of Labor Job Technician to help residents fine-tune their resumes and conduct their job searches.

In March 2017, The Alaska Department of Labor and Workforce Development and the MOA hosted an employment roundtable and announced expanded Job Center services, new apprenticeships, and development of mobile application to improve accessibility of Job Center programs. This partnership in Mountain View started over a year ago in recognition of steep unemployment in the community.

c. Transportation

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the Jurisdiction and Region.

The Municipality of Anchorage operates the public transit bus service in Anchorage, limited bus service in Eagle River, Chugiak, and Peters Creek, and commuter ride share service in the Mat-

Su Borough. The Eagle River Connection is a flexible transit service connecting Eagle River, Chugiak, Peters Creek and East Anchorage. According to the 2010-2014 U.S. Census American Community Survey 5-Year Summary File, about 2% of residents in Anchorage use public transit as their primary means of transportation to work. In certain parts of Anchorage, larger numbers of residents do commute by transit.

The existing public transit routes provide service to the highest minority residents, especially since most of these neighborhoods are located near main roads in Anchorage. The public transit line, 45-Mountain View, is useful and reliable enough that 5%, and in more limited cases 15%, of residents are choosing to rely on it.

Areas in Anchorage with a significant density of households without access to cars include areas in Government Hill, and between downtown and the University areas. The neighborhoods with the highest number of zero-vehicle households are some of the same neighborhoods with the highest minority residents.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity

(Anchorage, AK CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	75.95	70.08	68.30	47.06	71.29	45.77	28.09
Black, Non-Hispanic	61.75	61.58	52.46	54.18	79.12	49.00	23.36
Hispanic	66.52	65.12	58.03	52.19	77.41	48.49	22.45
Asian or Pacific Islander, Non-Hispanic	61.74	62.44	58.48	55.47	80.04	45.07	15.65
Native American, Non-Hispanic	62.69	63.32	58.21	54.19	79.09	49.42	17.58
Population below federal poverty line							
White, Non-Hispanic	63.48	63.99	59.11	53.66	78.52	48.92	19.64
Black, Non-Hispanic	50.84	53.90	45.98	58.93	82.32	45.83	19.48
Hispanic	58.52	64.03	55.10	54.31	81.84	54.02	12.39
Asian or Pacific Islander, Non-Hispanic	43.16	55.75	38.66	58.35	84.08	47.25	16.92
Native American, Non-Hispanic	55.72	59.79	53.33	56.88	82.49	52.62	13.32
(Anchorage, AK) Region							
Total Population							
White, Non-Hispanic	71.92	70.08	58.72	39.03	61.26	45.77	34.34
Black, Non-Hispanic	61.70	61.58	51.59	52.61	77.07	49.00	24.30
Hispanic	65.90	65.12	55.00	48.02	72.17	48.49	24.88
Asian or Pacific Islander, Non-Hispanic	61.75	62.44	57.53	53.91	78.22	45.07	16.72
Native American, Non-Hispanic	62.13	63.32	53.65	48.05	71.64	49.42	21.33
Population below federal poverty line							
White, Non-Hispanic	60.82	66.98	47.59	38.30	61.59	49.89	28.90
Black, Non-Hispanic	51.11	54.70	45.49	57.54	80.66	46.33	19.48
Hispanic	58.73	65.61	52.60	50.35	76.41	55.32	15.17
Asian or Pacific Islander, Non-Hispanic	43.78	56.57	38.73	56.82	82.83	47.99	18.29
Native American, Non-Hispanic	57.39	63.38	48.78	48.68	72.84	52.60	16.82
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).							

HUD table 12 Opportunity Indicators by Race/Ethnicity the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The higher the index the lower the cost. The Transit Index measures how often low-income families in a neighborhood use public transportation. The higher the index the more likely residents of a neighborhood will access public transportation.

HUD table 12 Low Transportation Cost Index for the total population of Anchorage are above 70 for all race/ethnic populations. The White population is at the lowest index (highest cost) at

71.29 and the Asian or Pacific Islander population is at the highest index (lowest cost) at 80.04. The Black population's index is at 79.12, Native American population's index is at 79.09, and the Hispanic population's index is at 77.41.

HUD table 12 Low Transportation Cost Index for the total population of Anchorage below the federal poverty level are above 80 for all race/ethnic populations except the White population. The White population is at the lowest index (highest cost) at 78.52 and the Asian or Pacific Islander population is at the highest index (lowest cost) at 84.08. The Native American population's index is at 82.49, Black population's index is at 82.32, and the Hispanic population's index is at 81.84. HUD map 11 Demographics and Low Transportation Costs confirm that residents that are closer to the main roads in Anchorage and public transit have lower transportation costs.

HUD table 12 Low Transportation Cost Index for the total population of the Region are above 70 for all race/ethnic populations with the exception of the White population. The White population is at the lowest index (highest cost) at 61.26 and the Asian or Pacific Islander population is at the highest index (lowest cost) at 78.22. The Black population's index is at 77.07, Hispanic population's index is at 72.17, and the Native American population's index is at 71.64.

HUD table 12 Low Transportation Cost Index for the total population of the Region below the federal poverty level are above 70 for all race/ethnic populations except the White population. The White population is at the lowest index (highest cost) at 61.59 and the Asian or Pacific Islander population is at the highest index (lowest cost) at 82.83. The Black population's index is at 80.66, Hispanic population's index is at 76.41, and the Native American population's index is at 72.84.

The HUD table 12 Transit Index tells a slightly different story. The transit index for the total population of Anchorage are above 50 for all race/ethnic populations except the White population. The White population is at the lowest index (less likely to use) at 47.06 and the Asian or Pacific Islander population is at the highest index (most likely to use) at 55.47. The Native American population's index is at 54.19, the Black population's index is at 54.18, and the Hispanic population's index is at 52.19.

HUD table 12 Transit Index for the total population of Anchorage below the federal poverty level are above 50 for all race/ethnic populations. The White population is at the lowest index (less likely to use) at 53.66 and the Black population is at the highest index (most likely to use) at 58.93. The Asian or Pacific Islander population's index is at 58.35, Native American population's index is at 56.88, and the Hispanic population's index is at 54.31. HUD map 10 Demographics and Transit Trips confirm that residents that are closer to the main roads in Anchorage and public transit have higher use of public transit.

HUD table 12 Transit Index for the total population of the Region are close to 50 for all race/ethnic populations with the exception of the White population. The White population is at the lowest index (less likely to use) at 39.03 and the Asian or Pacific Islander population is at the highest index (most likely to use) at 53.91. The Black population's index is at 52.61, Native American population's index is at 48.05, and the Hispanic population's index is at 48.02.

HUD table 12 Transit Index for the total population of the Region below the federal poverty level are close to or above 50 for all race/ethnic populations except the White population. The White population is at the lowest index (less likely to use) at 38.30 and the Black population is at the highest index (most likely to use) at 57.54. The Asian or Pacific Islander population's index is at 56.82, Hispanic population's index is at 50.35, and the Native American population's index is at 48.68.

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the Jurisdiction and Region.

The combination of low transportation cost index and transit index identifies that the White population in Anchorage has the highest transportation cost and least likely to use public transit and the Asian or Pacific Islander has the lowest transportation cost and most likely to use public transit. Asian or Pacific Islander, Black, Native American and Hispanic populations are above 50 in the transit index (most likely to use) and would be most impacted by a lack of a reliable, affordable public transit services between their place of residence and jobs, daycares, schools and services in Anchorage.

For the population below the federal poverty level the combination of low transportation cost index and transit index identifies the White population in Anchorage has the highest transportation cost and least likely to use public transit. The Asian or Pacific Islander has the lowest transportation cost and most likely to use public transit. The Asian or Pacific Islander and Black populations are close to 60 and the White, Native American and Hispanic populations are above 50 in the transit index (most likely to use). All race/ethnic populations below the federal poverty level would be most impacted by a lack of a reliable, affordable public transit services between their place of residence and jobs, daycares, schools and services in Anchorage.

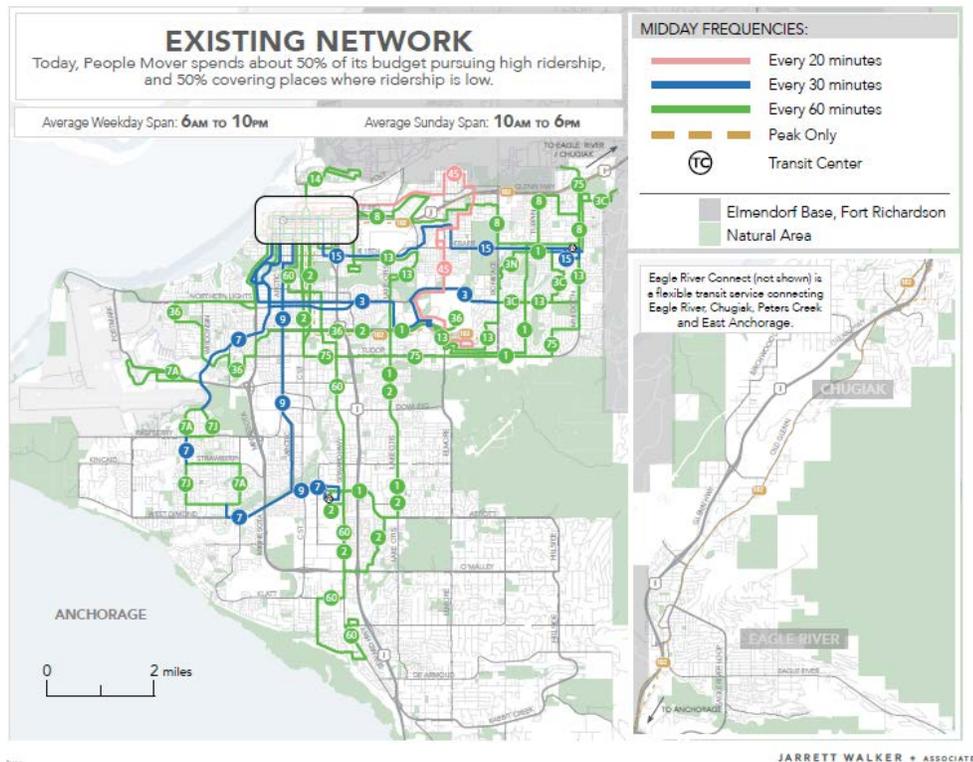
iii. Informed by community participation, any consultation with other relevant government agencies, and the participation's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

The MOA Public Transportation Department provides AnchorRIDES which is the Anchorage Coordinated Paratransit System providing accessible Dial-A-Ride transportation for eligible persons through pre-scheduled trip reservations for local, state and non-profit organizations.

Using accessible AnchorRIDES vehicles, Eagle River Connect provides deviated fixed route transportation for the general public on weekdays both within Eagle River/Chugiak/Peters Creek and to/from East Anchorage. AnchorRIDES and Eagle River Connect are provided under municipal contract by MV Transportation, Inc. and as an HCB Medicaid Waiver provider for the State of Alaska, Division of Senior and Disability Services. The staff and drivers of AnchorRIDES are qualified and trained to provide safe and professional transportation for Anchorage residents and visitors.

The MOA Public Transportation Department provides vans for Anchorage's commuters who use Share-A-Ride vanpooling to save money, reduce stress, reduce traffic, and improve air quality

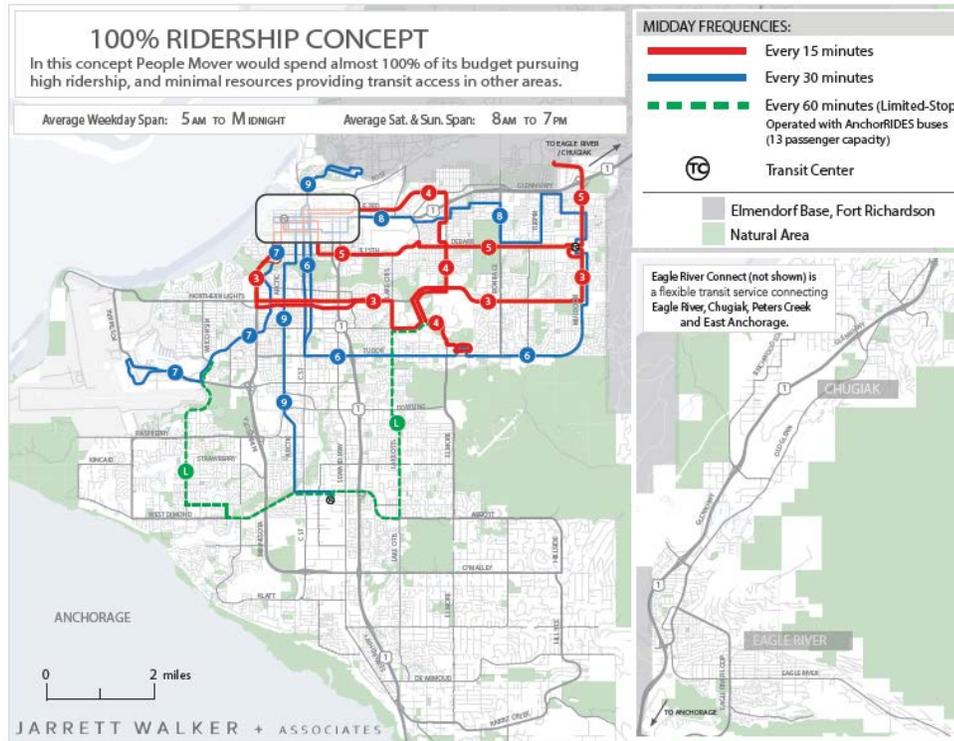
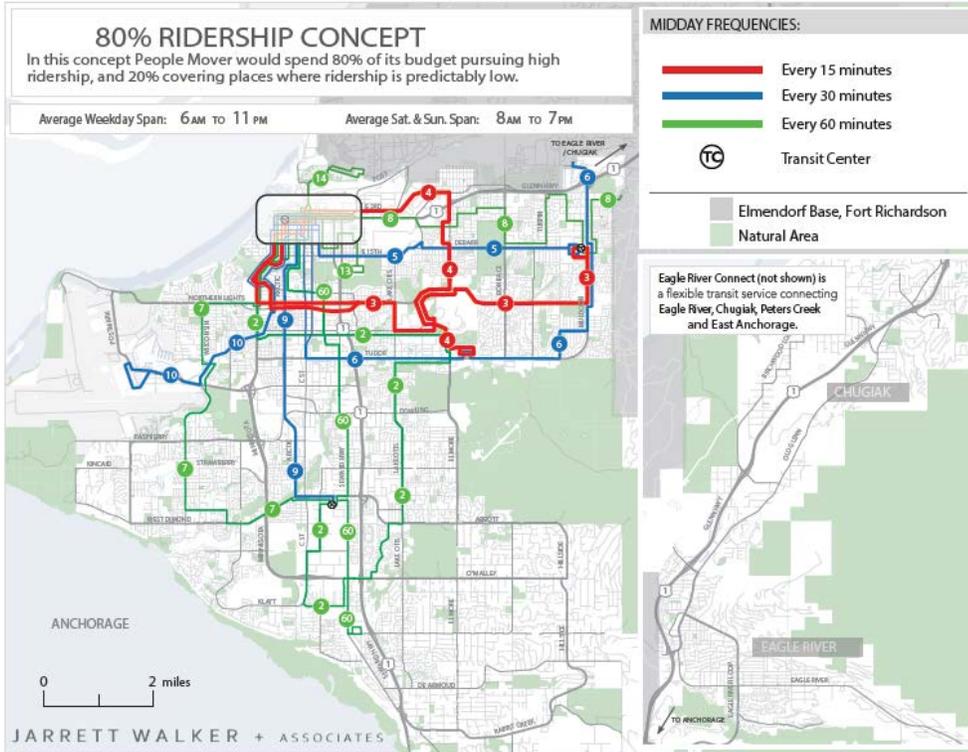
when traveling from Eagle River, Girdwood and the Mat-Su region. The MOA Public Transportation Department provides vanpool group subsidies and oversight of Enterprise Rideshare, hired to manage and operate vanpooling for the Anchorage commute area.



Starting in April 2016, the MOA Public Transportation Department introduced to the residents of the communities of the Municipality two concepts that shift public transit service away from coverage in neighborhoods towards higher frequency in more densely populated areas. Such a shift would prioritize ridership growth in areas with high transit propensity and higher concentrations of minority and low-income populations. To achieve higher frequency in these areas without increasing the public transit budget, some neighborhoods with relatively low ridership would no longer receive public transit bus service.

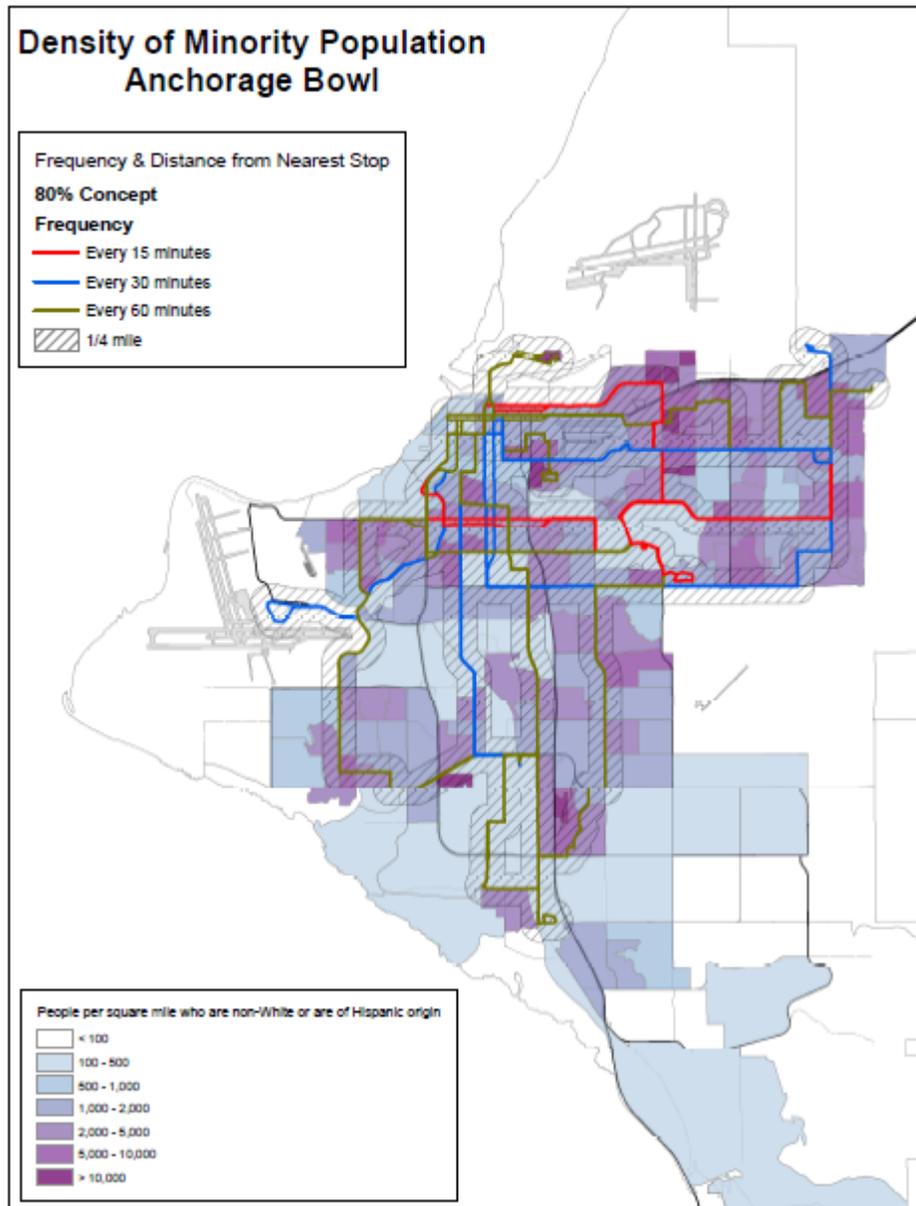
The two concepts are an 80/20% ridership-coverage split and a 100% ridership/minimal coverage split. In both the 80% and 100% concepts the low ridership rush-hour-only service to Eagle River and Chugiak is no longer offered. Eagle River Connect still remains.

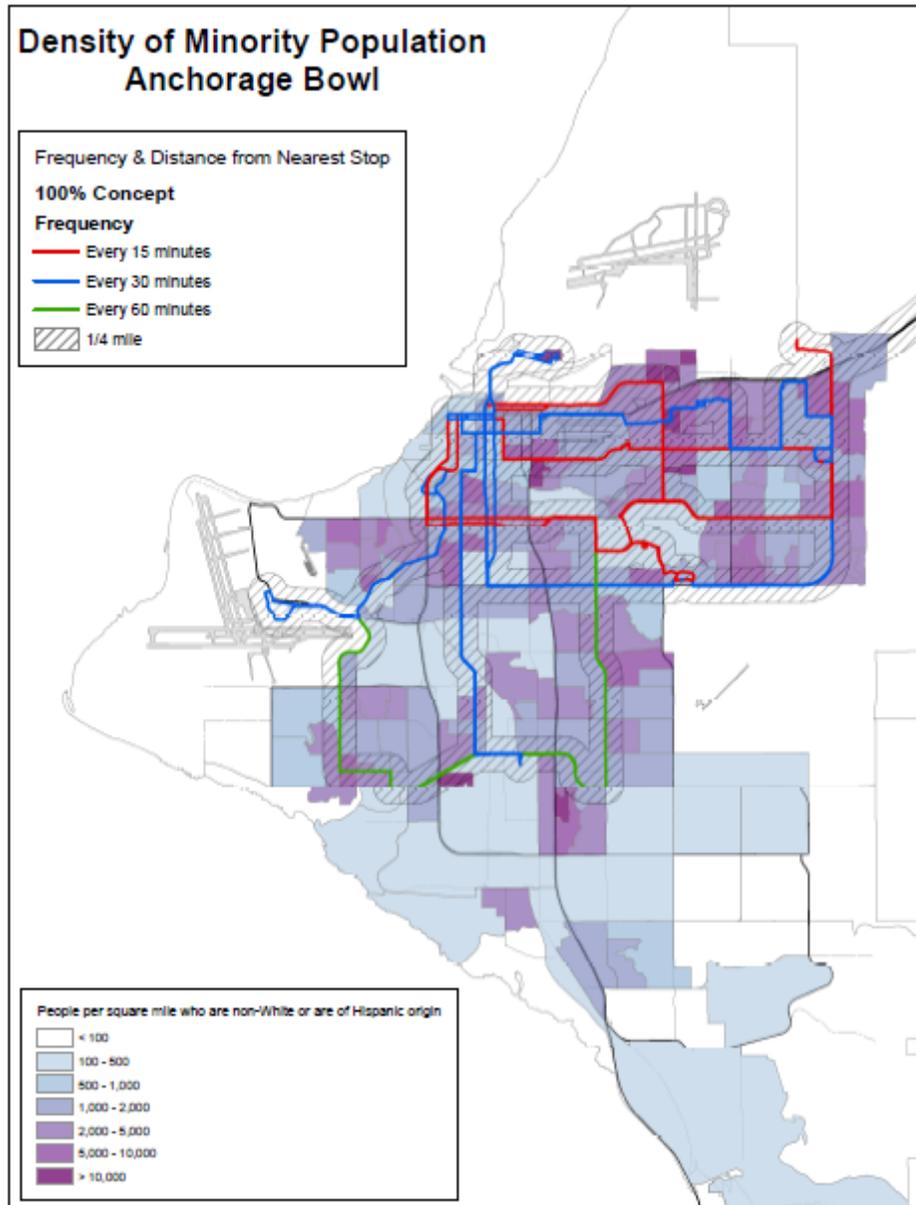
In both concepts a larger number of Anchorage residents and jobs would be within walking distance of public transit arriving every 15 minutes instead of every 60 minutes. In both concepts, most residents and jobs are within 1/4 to half mile walk of some public transit service. As a result, some residents who today have a bus stop very close by, would in these concepts need to walk farther to access service. In the 100% concept, geographic coverage is reduced, so that service can be concentrated into more frequent routes. The neighborhoods south of Dimond Road will have no public transit service if the 100% concept is implemented.



Density Maps Explanations:

In the public transit plan, density maps are meant to convey how many residents per square mile in each block group share a common attribute, such as poverty or minority status. These maps focus on the concentration of residents in a given area, even if that number is relatively low. For example, a very small block group might have a very high concentration of residents in poverty, even if the total number is lower than in some larger block groups. Mapping the density of an attribute also helps reduce uncertainty resulting from the margins of error in the American Community Survey estimates, because density focuses on the more general magnitude of an attribute in a block group rather than the total number in that block group.





Maps utilizing standard deviation, on the other hand, are meant to show high total numbers of residents in each block group that share a common attribute, regardless of density. This is useful for determining where, for example, large numbers of minorities reside even if they are a relatively low percentage of the total population of the block group. However, this can sometimes have the effect of overemphasizing large block groups at the expense of smaller block groups where the percentage of minorities relative to the total population might be much higher. When using totals instead of density, categorizing block groups by standard deviation helps reduce the uncertainty of the margin of error in American Community Survey estimates by focusing on block groups that are meaningfully higher than the Muni-wide average.

Equity Analysis for Route Concepts

Population within 1/4 Mile of Bus Stops					
<i>2015 American Community Survey</i>					
	Existing System	80% Concept	% Change from Existing	100% Concept	% Change from Existing
Minority 2015	74,315	61,826	-16.8%	47,382	-36.2%
Poverty 2015	16,785	13,875	-17.3%	11,399	-32.1%
Population 2015	152,431	124,143	-18.6%	92,500	-39.3%

Breakdown of Population within 1/4 Mile of Bus Stops			
<i>2015 American Community Survey</i>			
	Existing System	80% Concept	100% Concept
in poverty	11.0%	11.2%	12.3%
minority	48.8%	49.8%	51.2%

<i>2013 American Community Survey</i>			
	Existing System	80% Concept	100% Concept
with no vehicles	8.7%	9.3%	10.0%
limited English	4.0%	4.2%	4.3%
senior (65+)	8.2%	8.2%	8.3%
youth (18-)	24.4%	24.0%	23.8%
with disabilities	12.0%	12.2%	12.7%
jobs	133,244	128,884	112,737

Population within 1/2 Mile of Bus Stops					
<i>2015 American Community Survey</i>					
	Existing System	80% Concept	% Change from Existing	100% Concept	% Change from Existing
Minority 2015	94,634	88,693	-6.3%	76,733	-18.9%
Poverty 2015	20,426	19,081	-6.6%	16,998	-16.8%
Population 2015	201,625	185,045	-8.2%	156,294	-22.5%

Breakdown of Population within 1/2 Mile of Bus Stops			
<i>2015 American Community Survey</i>			
	Existing System	80% Concept	100% Concept
in poverty	10.1%	10.3%	10.9%
minority	46.9%	47.9%	49.1%

<i>2013 American Community Survey</i>			
	Existing System	80% Concept	100% Concept
with no vehicles	8.3%	8.5%	9.0%
limited English	3.8%	3.9%	4.0%
senior (65+)	8.0%	8.0%	8.2%
youth (18-)	24.5%	24.4%	24.3%
with disabilities	11.8%	12.0%	12.2%
jobs	147,683	145,749	135,630

Equity Analysis Summary:

As discussed, implementing the 80% Concept or the 100% Concept would increase the level of transit service in some areas, but it would also reduce public transit bus services' overall service footprint. It is important to MOA Public Transportation Department that neither minorities nor families living in poverty are disproportionately affected by any service change. In an attempt to quantify the potential impact that a significant service change resulting from Anchorage Talks Transit could have on minority and poverty populations in Anchorage, MOA Public Transportation Department used the Remix web platform to produce an equity analysis that

compares coverage to those groups under the existing system, the 80% Concept, and the 100% Concept.

For the purposes of this analysis, “minority” was defined as all individuals reporting as non-white or Hispanic, and “poverty” was defined as families living at 100% or less of the federal poverty level. The equity analysis uses American Community Survey (ACS) 5-year estimates for the total population, minority groups, and poverty groups (in the table these are titled Population 2015, Minority 2015, and Poverty 2015, respectively). The equity analysis used that data to calculate how many residents within each category fall within a ¼ mile and ½ mile of bus routes in each concept.

Using the available data, and whether considering only those living within ¼ mile of routes or those living within up to ½ mile of routes, the table shows that both the 80% Concept and the 100% Concept:

- a. remove less service coverage from minority or poverty groups than from the population as a whole (shown in “Population within [¼ mile and ½ mile] of Bus Stops”), and
- b. actually dedicate a greater percentage of the remaining service coverage to minority and poverty groups than the existing system does (shown in “Breakdown of Population within [¼ mile and ½ mile] of Bus Stops”).

This equity analysis indicates that implementing the 80% Concept or 100% Concept would not disproportionately impact poverty or minority groups in Anchorage. MOA Public Transportation Department is considering these results, in conjunction with other factors such as concentrations of existing ridership, to analyze the potential impacts of service changes that could result from the Anchorage Talks Transit process.

Whichever ridership concept that the MOA Public Transportation Department implements may have varying impacts on residents who rely on public transit to get to jobs, daycares, schools, entertainment and services. The impact would be positive when residents have direct access to more frequent bus service every 15 minutes instead of every 60 minutes. The impact would be negative when residents have to walk ¼ to half mile to a bus stop or no longer have access to public transit in their neighborhoods. The public comment period on the two concepts ended on December 31, 2106. The MOA expects to implement one of these new ridership concepts in August 2017.

d. Access to Low Poverty Neighborhoods

- i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the Jurisdiction and Region.*

Approximately half of Anchorage residents are devoting 35-75% of their income on housing. (United Way of Anchorage and Fison & Associates). In Anchorage, there are nearly 3,000 households with subsidized rent and more than double that number on the waiting list (Public Housing Department at Alaska Housing Finance Corporation).

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction							
Total Population							
White, Non-Hispanic	75.95	70.08	68.30	47.06	71.29	45.77	28.09
Black, Non-Hispanic	61.75	61.58	52.46	54.18	79.12	49.00	23.36
Hispanic	66.52	65.12	58.03	52.19	77.41	48.49	22.45
Asian or Pacific Islander, Non-Hispanic	61.74	62.44	58.48	55.47	80.04	45.07	15.65
Native American, Non-Hispanic	62.69	63.32	58.21	54.19	79.09	49.42	17.58
Population below federal poverty line							
White, Non-Hispanic	63.48	63.99	59.11	53.66	78.52	48.92	19.64
Black, Non-Hispanic	50.84	53.90	45.98	58.93	82.32	45.83	19.48
Hispanic	58.52	64.03	55.10	54.31	81.84	54.02	12.39
Asian or Pacific Islander, Non-Hispanic	43.16	55.75	38.66	58.35	84.08	47.25	16.92
Native American, Non-Hispanic	55.72	59.79	53.33	56.88	82.49	52.62	13.32
(Anchorage, AK) Region							
Total Population							
White, Non-Hispanic	71.92	70.08	58.72	39.03	61.26	45.77	34.34
Black, Non-Hispanic	61.70	61.58	51.59	52.61	77.07	49.00	24.30
Hispanic	65.90	65.12	55.00	48.02	72.17	48.49	24.88
Asian or Pacific Islander, Non-Hispanic	61.75	62.44	57.53	53.91	78.22	45.07	16.72
Native American, Non-Hispanic	62.13	63.32	53.65	48.05	71.64	49.42	21.33
Population below federal poverty line							
White, Non-Hispanic	60.82	66.98	47.59	38.30	61.59	49.89	28.90
Black, Non-Hispanic	51.11	54.70	45.49	57.54	80.66	46.33	19.48
Hispanic	58.73	65.61	52.60	50.35	76.41	55.32	15.17
Asian or Pacific Islander, Non-Hispanic	43.78	56.57	38.73	56.82	82.83	47.99	18.29
Native American, Non-Hispanic	57.39	63.38	48.78	48.68	72.84	52.60	16.82

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

HUD table 12 Opportunity Indicators by Race/Ethnicity the Low Poverty Index in HUD table 12 uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. In Anchorage, Asian or Pacific Islander population has the most exposure to poverty based on the lowest index score of 61.74, followed by the Black population with a score of 61.75. The 3rd highest exposure to poverty is the Native American population with a score of 62.69, followed by Hispanic population with a score of 66.52. The White population has the lowest exposure to poverty with a score of 75.95. The same order of highest to lowest is maintained for the populations living below the federal poverty in Anchorage with the Asian or Pacific Islander population at 43.16, Black population at 50.84, Native American population at 55.72, Hispanic population at 58.52, and White population at 63.48.

In the Region, Black population has the most exposure to poverty based on the lowest index score of 61.70, followed by the Asian or Pacific Islander population with a score of 61.75. The 3rd highest exposure to poverty is the Native American population with a score of 62.13, followed by Hispanic population with a score of 65.90. The White population has the lowest exposure to poverty with a score of 71.92. The order changes in the Region from highest to lowest poverty exposure for the populations living below the federal poverty with the Asian or Pacific Islander population at 43.75, Black population at 51.11, Native American population at 57.39, Hispanic population at 58.73, and White population at 60.82.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the Jurisdiction and Region.

The HUD map 12 Demographics and Poverty identifies neighborhoods exposure to poverty as being distributed in many of the neighborhoods throughout Anchorage, Eagle River, Chugiak, Peters Creek and Eklutna. The neighborhoods that are identified in Anchorage with a higher poverty index are Mountain View/Government Hill (Census Tract 6) with a 14 index, Russian Jack (Census Tract 8.02 and 8.01) with 27 and 35 indexes respectively, Airport Heights (Census Tract 9.01) with a 28 index, Midtown (Census Tract 19) with a 31 index, and Spenard (Census Tract 22.02) with a 36 index. Three of these neighborhoods, Mountain View/Government Hill, Russian Jack and Airport Heights, are identified as the same Anchorage neighborhoods having higher concentrations of race/ethnic populations. However, some of these exposure to poverty neighborhoods are not neighborhoods identified as having high concentrations of race/ethnic populations. The neighborhoods with exposure to poverty appear to be located in neighborhoods in north Anchorage with older single family houses, large housing developments, apartments, and manufactured housing/trailer parks.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

In 2016 the Anchorage average adjusted rent for a 1 bedroom was \$1,259 and an estimated 3.8% vacancy (Rental Survey by Alaska Department of Labor and Workforce Development). The average rent for a one-bedroom apartment in Anchorage increased from \$1,112 in 2015 to \$1,259 in 2016 (Rental Survey by Alaska Department of Labor and Workforce Development). Two out of five residents, or 40% of Anchorage's population, are renters.

The Municipality's Planning Department, Anchorage 2040 Land Use Plan was adopted by MOA in February 2016. The plan's key growth strategies include housing and neighborhoods as defined as providing a diverse supply of affordable, quality housing that meets the needs and preferences of the city's residents, at all income levels, in safe and livable neighborhoods. The strategies are:

1. Balanced regional growth
2. Infill and redevelopment
3. Centers and corridors
4. Housing and neighborhoods
5. Coordinated and focused public investment
6. Land use - transportation coordination
7. Industrial land prioritization
8. Compatible land use
9. Open space and greenbelts
10. Anchor institutions and facilities

The Anchorage 2040 Land Use Plan identified that housing of all types and sizes are needed in order to provide a range of housing opportunities for all residents. The 2012 Anchorage Housing Market Analysis identified that the remaining supply of vacant buildable lands in the Anchorage area must be more efficiently developed. Housing will need to be more "compact" in form if

there is to be enough housing to meet future need. This compact form includes small-lot “cottage” homes, accessory dwellings where appropriate, attached dwellings (duplex and triplex), townhouses, multifamily, and residential units built as part of commercial developments (mixed-use).

Anchorage has income segregated housing patterns. The high demand for housing in Anchorage and in the Region is causing displacement of low-income persons including protected classes of residents due to economic pressures and loss of affordable housing due to re-development. As a result, land use, zoning and occupancy restrictions can have a significant impact on the Anchorage segregated housing patterns. Housing development has to be affordable if rent and home ownership are going to be affordable for low and moderate-income residents for all race/ethnicity.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the Jurisdiction and Region.

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity

(Anchorage, AK CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	75.95	70.08	68.30	47.06	71.29	45.77	28.09
Black, Non-Hispanic	61.75	61.58	52.46	54.18	79.12	49.00	23.36
Hispanic	66.52	65.12	58.03	52.19	77.41	48.49	22.45
Asian or Pacific Islander, Non-Hispanic	61.74	62.44	58.48	55.47	80.04	45.07	15.65
Native American, Non-Hispanic	62.69	63.32	58.21	54.19	79.09	49.42	17.58
Population below federal poverty line							
White, Non-Hispanic	63.48	63.99	59.11	53.66	78.52	48.92	19.64
Black, Non-Hispanic	50.84	53.90	45.98	58.93	82.32	45.83	19.48
Hispanic	58.52	64.03	55.10	54.31	81.84	54.02	12.39
Asian or Pacific Islander, Non-Hispanic	43.16	55.75	38.66	58.35	84.08	47.25	16.92
Native American, Non-Hispanic	55.72	59.79	53.33	56.88	82.49	52.62	13.32
(Anchorage, AK) Region							
Total Population							
White, Non-Hispanic	71.92	70.08	58.72	39.03	61.26	45.77	34.34
Black, Non-Hispanic	61.70	61.58	51.59	52.61	77.07	49.00	24.30
Hispanic	65.90	65.12	55.00	48.02	72.17	48.49	24.88
Asian or Pacific Islander, Non-Hispanic	61.75	62.44	57.53	53.91	78.22	45.07	16.72
Native American, Non-Hispanic	62.13	63.32	53.65	48.05	71.64	49.42	21.33
Population below federal poverty line							
White, Non-Hispanic	60.82	66.98	47.59	38.30	61.59	49.89	28.90
Black, Non-Hispanic	51.11	54.70	45.49	57.54	80.66	46.33	19.48
Hispanic	58.73	65.61	52.60	50.35	76.41	55.32	15.17
Asian or Pacific Islander, Non-Hispanic	43.78	56.57	38.73	56.82	82.83	47.99	18.29
Native American, Non-Hispanic	57.39	63.38	48.78	48.68	72.84	52.60	16.82

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

HUD table 12 Opportunity Indicators by Race/Ethnicity the Environmental Health Index listed in HUD table 12 indicates the health of a neighborhood based on exposure to air pollution (the lowest score the higher the exposure to air pollution). The environmental health index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. In Anchorage, Asian or Pacific Islander population has the most exposure to

air pollution based on the lowest index score of 15.65, followed by the Native American population with a score of 17.58. The 3rd highest exposure to air pollution is the Hispanic population with a score of 22.45, followed by Black population with a score of 23.36. The White population has the lowest exposure to air pollution with a score of 28.09.

In Anchorage, Hispanic population below the federal poverty level has the most exposure to air pollution based on the lowest index score of 12.39, followed by the Native American population with a score of 13.32. The 3rd highest exposure to air pollution is the Asian or Pacific Islander population with a score of 16.92, followed by Black population with a score of 19.48. The White population has the lowest exposure to air pollution with a score of 19.64.

In the Region, Asian or Pacific Islander population has the most exposure to air pollution based on the lowest index score of 16.72, followed by the Native American population with a score of 21.33. The 3rd highest exposure to air pollution is the Black population with a score of 24.30, followed by Hispanic population with a score of 24.88. The White population has the lowest exposure to air pollution with a score of 34.34. The order changes in the Region from highest to lowest exposure to air pollution for the populations living below the federal poverty with the Hispanic population at 15.17, Native American population at 16.82, Asian or Pacific Islander population at 18.29, Black population at 19.48, and White population at 28.90.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the Jurisdiction and Region.

HUD map 13 Demographics and Environmental Health reflex population patterns of race/ethnic, national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the Anchorage and the region. The higher the environmental health index indicates a better environmental health level or less exposure to toxins harmful to human health.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

No neighborhoods in Anchorage and the other communities of the Municipality have any known low or high levels of other environmental health hazards. The MOA's Real Estate Department and Anchorage Community Land Trust manage the Municipal lands to ensure that any environmental health hazards are addressed or remediated properly.

f. Patterns in Disparities in Access to Opportunities

i. For all the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the Jurisdiction and Region.

Anchorage and the Region have no identifiable overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Anchorage and the Region have no readily identifiable areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Anchorage and the Region have no protected classes that are either moderately segregated or highly segregated other than the one R/ECAP neighborhood.

The R/ECAP neighborhood of Mountain View has received a consistent public investment in infrastructure and public facilities in an effort to improve the neighborhood. The R/ECAP neighborhoods have many resources such as employment options, proficient schools, public transportation and services. Anchorage neighborhoods that are identified as having high concentrations of race/ethnicity and low to moderate income households are located either within or in close proximity to areas of high opportunity including employment options, proficient schools, public transportation and services.

ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

The MOA has no additional HUD or local data to address this question.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the Jurisdiction and Region affecting groups with other protected characteristics.

Following incarceration, many returning citizens join the growing number of residents in Anchorage struggling to obtain safe, affordable, and supportive housing. Former offenders face additional barriers in seeking access to the scarce housing options available. Court orders, state laws, local ordinances, and conditions of release often restrict the locations in which a returning citizen can seek housing. In the private rental market, many landlords are unwilling to rent to individuals with a criminal record. Due to exclusions in federal housing assistance policy and the broad discretion of local public housing authorities to add exclusions, individuals with a criminal history are not eligible for many forms of public housing assistance.

Alaska prisoners are disproportionately a minority race/ethnicity. Consequently, criminal records-based barriers to housing are likely to have a disproportionate impact on minority housing seekers. Given these barriers, incarceration puts returning prisoners at greater risk of homelessness. A certain proportion of incoming prisoners were homeless before their incarceration, and at least as many end up homeless for some period of time after leaving prison. For those with histories of mental illness, the likelihood is still greater. Nationally, surveys of homeless assistance providers and individuals who use their services have found that about half of currently homeless clients had been in jail or prison at some point in their lives. Parolees without stable housing may face a higher risk of parole failure, whether through re-arrest for a

new crime or failure to meet basic parole requirements. Reference “The Alaska Department of Corrections Recidivism Reduction Plan”, March 2015.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g. proficient schools, employment opportunities, and transportation).

Whichever ridership concept (80% or 100%) that the MOA Public Transportation Department implements may have varying impacts on residents who rely on public transit to get to jobs, daycares, schools, entertainment and services. The impact would be positive when residents have direct access to more frequent bus service every 15 minutes instead of every 60 minutes. The impact would be negative when residents have to walk ¼ to half mile to a bus stop or no longer have access to public transit in their neighborhoods. The public comment period on the two concepts ended on December 31, 2106. The MOA expects to implement one of these new ridership concepts in August 2017.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the Jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- **Availability, type, frequency, and reliability of public transportation**
- Impediments to mobility
- **Lack of access to opportunity due to high housing costs**
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- **Land use and zoning laws**
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- **Loss of affordable housing**
- Occupancy codes and restrictions
- Private discrimination
- **Sources of income discrimination**
- Other

The MOA Public Transportation Department plans to implement a new ridership concept in August 2017 that would have varying impacts on residents who rely on public transit to get to jobs, daycares, schools, and services.

In 2016 the Anchorage average adjusted rent for a one bedroom was \$1,259 and an estimated 3.8% vacancy (Rental Survey by Alaska Department of Labor and Workforce Development). The average rent for a one-bedroom apartment in Anchorage increased from \$1,112 in 2015 to \$1,259 in 2016 (Rental Survey by Alaska Department of Labor and Workforce Development). Two out of five residents, or 40% of Anchorage’s population, are renters.

The Municipality’s Planning Department, Anchorage 2040 Land Use Plan was adopted by MOA in February 2016. The plan’s key growth strategies include housing and neighborhoods as defined as providing a diverse supply of affordable, quality housing that meets the needs and preferences of the city’s residents, at all income levels, in safe and livable neighborhoods.

The Anchorage 2040 Land Use Plan identified that housing of all types and sizes are needed in order to provide a range of housing opportunities for all residents. The 2012 Anchorage Housing Market Analysis identified that the remaining supply of vacant buildable lands in the Anchorage area must be more efficiently developed. Housing will need to be more “compact” in form if there is to be enough housing to meet future need. This compact form includes small-lot “cottage” homes, accessory dwellings where appropriate, attached dwellings (duplex and triplex), townhouses, multifamily, and residential units built as part of commercial developments (mixed-use).

Anchorage has income segregated housing patterns. The high demand for housing in Anchorage and in the Region is causing displacement of low-income persons including protected classes of residents due to economic pressures and loss of affordable housing due to re-development. As a result, land use, zoning and occupancy restrictions can have a significant impact on the Anchorage segregated housing patterns. Housing development has to be affordable if rent and home ownership are going to be affordable for low and moderate-income residents for all race/ethnicity.

iv. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burdens, overcrowding, or substandard housing) when compared to other groups for the Jurisdiction and Region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

In HUD table 9 Demographics of Households with Disproportionate Housing Needs the four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 50%.

HUD Table 9 - Demographics of Households with Disproportionate Housing Needs						
Disproportionate Housing Needs	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction			(Anchorage, AK) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	21,930	74,095	29.60%	31,700	101,674	31.18%
Black, Non-Hispanic	3,220	6,205	51.89%	3,373	6,517	51.76%
Hispanic	2,935	6,535	44.91%	3,249	7,384	44.00%
Asian or Pacific Islander, Non-Hispanic	3,490	7,148	48.82%	3,604	7,412	48.62%
Native American, Non-Hispanic	2,700	6,035	44.74%	3,149	7,139	44.11%
Other, Non-Hispanic	2,365	5,190	45.57%	2,815	6,203	45.38%
Total	36,650	105,210	34.84%	47,890	136,335	35.13%
Household Type and Size						
Family households, <5 people	16,480	58,855	28.00%	21,645	77,313	28.00%
Family households, 5+ people	5,390	11,120	48.47%	7,270	15,105	48.13%
Non-family households	14,780	35,240	41.94%	18,975	43,918	43.21%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	9,055	74,095	12.22%	14,555	101,674	14.32%
Black, Non-Hispanic	1,700	6,205	27.40%	1,748	6,517	26.82%
Hispanic	1,515	6,535	23.18%	1,677	7,384	22.71%
Asian or Pacific Islander, Non-Hispanic	2,265	7,148	31.69%	2,297	7,412	30.99%
Native American, Non-Hispanic	1,550	6,035	25.68%	1,833	7,139	25.68%
Other, Non-Hispanic	1,440	5,190	27.75%	1,720	6,203	27.73%
Total	17,520	105,210	16.65%	23,825	136,335	17.48%
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						
Note 4: Refer to the Data Documentation for details (www.hudexchange.info).						

In Anchorage and the Region, residents who identify as Black have the highest percentage of households more likely than other race/ethnic groups to experience housing cost burden, overcrowding or substandard housing at 51.89% and 51.76% respectively. The second highest are residents who identify as Asian or Pacific Islander who experience housing cost burden, overcrowding or substandard housing at 48.82% in Anchorage and 48.62% in the Region.

In Anchorage and the Region, residents who identify as Asian or Pacific Islander have the highest percentage of households more likely than other race/ethnic groups to experience severe housing cost burden, overcrowding or substandard housing at 31.69% and 30.99% respectively. The second highest are residents who identify as Black who experience severe housing cost burden, overcrowding or substandard housing at 27.40% in Anchorage and 26.82% in the Region.

In Anchorage, family households greater than five and non-family households are close by percentages in experiencing housing cost burden, overcrowding or substandard housing at 48.47% and 41.94% respectively. In the Region, family households greater than five and non-

family households are almost equal percentages in experiencing housing cost burden, overcrowding or substandard housing at 48.13% and 48.21% respectively.

b. Which areas in the Jurisdiction and Region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

HUD map 6 Housing Problems identifies the darkest areas of the map representing those five neighborhoods with the highest housing burdens are located in the R/ECAP neighborhoods of Mountain View/Government Hill (Census Tract 6) with 51.36% of total households with four housing problems. In Downtown neighborhood (Census Tract 11) with 54.32% of total households with four housing problems. In the Airport Heights neighborhood (Census Tract 9.01) with 51.89% of total households with four housing problems. In the Midtown neighborhood (Census Tract 19) with 51.16% of total households with four housing problems. In the Spenard neighborhood (Census Tract 20) with 54.58% of total households with four housing problems.

The most predominant race/ethnic populations with housing burdens in Mountain View/Government Hill (Census Tract 6) is the Asian or Pacific Islander population is over 50% of the population. In the Airport Heights neighborhood (Census Tract 9.01), Midtown neighborhood (Census Tract 19) and Spenard neighborhood (Census Tract 20) the White population is over 50% of the population. In Downtown neighborhood (Census Tract 11) the White population is over 60% of the total population.

HUD map 6 Housing Problems the Region for the Chugach area (Census Tract 3) almost 50% of the households have four housing problems. The White population in Census Tract 3 is 67.04% of the race/ethnic of the total population.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the Jurisdiction and Region.

HUD Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children (Anchorage, AK CDBG, HOME, ESG) Jurisdiction								
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	157	33.33%	196	41.61%	116	24.63%	266	56.48%
Project-Based Section 8	153	35.33%	123	28.41%	155	35.80%	225	51.96%
Other Multifamily	190	82.61%	0	0.00%	0	0.00%	0	0.00%
HCV Program	942	34.39%	1,080	39.43%	658	24.02%	1,176	42.94%
Note 1: Data Sources: APSH								
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).								

In HUD table 9 Demographics of Households with Disproportionate Housing Needs identifies in Anchorage, family households greater than five and non-family households are close by percentages in experiencing housing cost burden, overcrowding or substandard housing at 48.47% and 41.94% respectively. In the Region, family households greater than five and non-family households are almost equal percentages in experiencing housing cost burden, overcrowding or substandard housing at 48.13% and 48.21% respectively.

HUD table 11 Publicly Supported Housing indicates that in Public Housing units, 56.48% of households have children. Of all Public Housing units, 33.33% of the units are 0-1 bedroom, 41.46% of the units are 2 bedroom and 24.63% of the units are 3 or more bedrooms in size. Table 11 also shows that Project-based Section 8 units are 51.96% occupied by households with children. Section 8 units are comprised of 35.33% 0-1 bedroom units, 28.41% 2 bedroom units and 35.80% 3 or more bedroom units.

The Other Multifamily units listed in HUD table 11 show that none of the households have children and all units, 82.61%, are 0-1 bedrooms. Housing Choice Vouchers (HCV) program participating households are 42.94% households with children. HCV households units are 34.39% 0-1 bedroom units, 39.43% 2 bedroom units and 42.94% are 3 or more bedrooms units.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the Jurisdiction and Region.

HUD Table 16 - Homeownership and Rental Rates by Race/Ethnicity								
Race/Ethnicity	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction				(Anchorage, AK) Region			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	49,825	78.16%	24,265	58.52%	71,285	81.35%	30,385	62.38%
Black, Non-Hispanic	1,990	3.12%	4,220	10.18%	2,185	2.49%	4,335	8.90%
Hispanic	3,360	5.27%	3,180	7.67%	3,965	4.52%	3,430	7.04%
Asian or Pacific Islander, Non-Hispanic	3,495	5.48%	3,660	8.83%	3,675	4.19%	3,750	7.70%
Native American, Non-Hispanic	2,710	4.25%	3,315	7.99%	3,455	3.94%	3,670	7.53%
Other, Non-Hispanic	2,360	3.70%	2,820	6.80%	3,055	3.49%	3,135	6.44%
Total Household Units	63,745	-	41,465	-	87,625	-	48,710	-
Note 1: Data presented are numbers of households, not individuals.								
Note 2: Data Sources: CHAS								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

HUD table 16 Homeownership and Rental Rates by Race/Ethnicity, provides both homeownership and rental rates by race/ethnicity for Anchorage and the Region. In both Anchorage and the Region, the White population is the only race/ethnic population with the percentage of homeowners are higher than the percentage of renters. Anchorage’s White population has 78.16% homeowners compared to 58.52% renters. The Region’s White population has 81.35% homeowners compared to 62.38% renters.

All other race/ethnic populations identified in HUD table 16 are higher percentages of renters than homeowners. Anchorage’s Asian or Pacific Islander are the second highest percentage of

homeowners at 5.48% and renters at 8.83%. The third highest homeowners is the Hispanic population at 5.27% and renters at 7.67%. The fourth highest homeowner is the Native American population at 4.25% and renters at 7.99%. The Black population has the lowest percentage of homeowners at 3.12% and renters at 10.18%.

In the Region, Hispanic are the second highest percentage of homeowners at 4.52% and renters at 7.04%. The third highest homeowners is the Asian or Pacific Islander population at 4.19% and renters at 7.70%. The fourth highest homeowner is the Native American population at 3.94% and renters at 7.53%. The Black population has the lowest percentage of homeowners at 2.49% and renters at 8.90%.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the Jurisdiction and Region affecting groups with other protected characteristics.

There were 240 unsheltered homeless individuals reported in Anchorage on January 2016 during the Point-in-Time (PIT) count. In the PIT count, 467 individuals, 35 households with at least one adult and one child, and 3 household with only children reported living in emergency shelters. Homeless individuals often find it difficult to obtain housing because of poor credit, interactions with the criminal justice system or other issues even if they have access to a housing voucher or sufficient income to pay rent.

While chronic homelessness encompasses only about 15% of those experiencing homelessness in Anchorage, they are the highest users of community resources. If this segment of the homeless population can be housed, valuable resources could be available for others.

Rent in the Anchorage market is very expensive and many low-income individuals have a difficult time paying rent at current market rates while still being able to afford other essentials of life such as food and medical care. In 2016 the Anchorage average adjusted rent for a one bedroom was \$1,259 and an estimated 3.8% vacancy (Rental Survey by Alaska Department of Labor and Workforce Development). The average rent for a one-bedroom apartment in Anchorage increased from \$1,112 in 2015 to \$1,259 in 2016 (Rental Survey by Alaska Department of Labor and Workforce Development).

Approximately half of Anchorage residents are devoting 35-75% of their income on housing. (United Way of Anchorage and Fison & Associates). In Anchorage, there are nearly 3,000 households with subsidized rent and more than double that number on the waiting list (Public Housing Department at Alaska Housing Finance Corporation). Without some type of financial assistance, individuals experiencing homelessness cannot afford housing if it becomes available.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs.

The Municipality's Planning Department, Anchorage 2040 Land Use Plan predicts that Anchorage will need to accommodate up to 27,000 additional households, 62,000 more residents, and 44,000 additional jobs by 2040. The Anchorage 2040 Land Use Plan is designed to accommodate that growth in a way that enhances the quality of life for residents. It provides for more housing and businesses, while also building on strong communities, and preserving resources for the next generation.

Housing of all types and sizes are needed in order to provide a range of housing opportunities for all. The 2012 Anchorage Housing Market Analysis identified that the remaining supply of vacant buildable lands in Anchorage must be more efficiently developed. Housing will need to be more compact in form if there is to be enough housing to meet future need.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- **Availability of affordable units in a range of sizes**
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- **Lack of access to opportunity due to high housing costs**
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of Affordable Housing
- Source of income discrimination
- Other

The lack of affordable housing in Anchorage and the Region is evidenced by the very low homeowner rates of all minority race/ethnicity populations. Many times this is most acutely felt by renters who are low-income residents and residents with large families. In the rental market, the waiting list in Anchorage indicates that one and two bedroom waiting lists are in the highest demand, and units with three or more bedrooms are very much needed.

Land that is available to develop or re-develop in Anchorage is limited. Land use and zoning need to support mixed-income housing development if Anchorage is going to address income segregated housing patterns. Occupancy restrictions can help or inhibit the housing development of higher density housing which can reduce the cost of housing development. Family size may be influenced by the ethnicity of the parents so there is a need for housing development with 3 or more bedrooms that is affordable for rent or home ownership.

V. Fair Housing Analysis Section C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain race/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the Jurisdiction?

HUD Table 6 - Publicly Supported Households by Race/Ethnicity								
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	151	32.26%	80	17.09%	41	8.76%	87	18.59%
Project-Based Section 8	133	31.37%	55	12.97%	60	14.15%	116	27.36%
Other Multifamily	100	57.14%	5	2.86%	0	0.00%	65	37.14%
HCV Program	917	34.87%	730	27.76%	218	8.29%	327	12.43%
Total Households	74,095	70.43%	6,205	5.90%	6,535	6.21%	7,148	6.79%
0-30% of AMI	4,970	48.54%	1,180	11.52%	755	7.37%	1,179	11.51%
0-50% of AMI	8,845	42.42%	2,310	11.08%	1,970	9.45%	2,083	9.99%
0-80% of AMI	17,555	50.76%	3,020	8.73%	3,115	9.01%	3,378	9.77%
(Anchorage, AK) Region	Asian or Pacific Islander							
Housing Type	White		Black		Hispanic		Islander	
	#	%	#	%	#	%	#	%
Public Housing	151	32.26%	80	17.09%	41	8.76%	87	18.59%
Project-Based Section 8	133	31.37%	55	12.97%	60	14.15%	116	27.36%
Other Multifamily	100	57.14%	5	2.86%	0	0.00%	65	37.14%
HCV Program	1,296	41.45%	758	24.24%	235	7.52%	342	10.94%
Total Households	101,674	74.58%	6,517	4.78%	7,384	5.42%	7,412	5.44%
0-30% of AMI	8,234	58.54%	1,255	8.92%	840	5.97%	1,193	8.48%
0-50% of AMI	13,869	49.31%	2,389	8.49%	2,175	7.73%	2,125	7.56%
0-80% of AMI	26,794	57.46%	3,129	6.71%	3,455	7.41%	3,490	7.48%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

In HUD table 6 Publicly Supported Households by Race/Ethnicity, the highest percentage of Anchorage residents residing in publicly supported housing are the White population ranging from 57.14% for Other Multifamily housing to 31.37% for Project-based Section 8 housing. The second highest percentage of residents residing in publicly supported housing are the Asian or

Pacific Islander population range from 37.14% for Other Multifamily housing to 12.43% for Housing Choice Voucher (HCV) Program housing. The Black population residing in publicly supported housing range from 27.76% HCV Program housing and 2.86% Other Multifamily housing. The Hispanic population residing in publicly supported housing range from 14.15% Project-based Section 8 housing and 0% Other Multifamily housing. There is no data on the Native American population residing in publicly supported housing in Anchorage.

ii. Compare the race/ethnic demographics of each program category of publicly supported housing for the Jurisdiction to the demographics of the same program category in the Region.

In HUD table 6 Publicly Supported Households by Race/Ethnicity, the highest percentage of the Region residents residing in publicly supported housing are the White population similar to the Anchorage population ranging from 57.14% for Other Multifamily housing to 31.37% for Project-based Section 8 housing. The second highest percentage of residents residing in publicly supported housing in the Region and similar to Anchorage population are the Asian or Pacific Islander population range from 37.14% for Other Multifamily housing to 10.94% for Housing Choice Voucher (HCV) Program housing. The Black population residing in publicly supported housing in the Region and similar to Anchorage population range from 24.24% HCV Program housing and 2.86% Other Multifamily housing. The Hispanic population residing in publicly supported housing in the Region and similar to Anchorage population range from 14.15% Project-based Section 8 housing and 0% Other Multifamily housing. There is no data on the Native American population residing in publicly supported housing in the Region.

iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the Jurisdiction and Region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

In the HUD table 6 Publicly Supported Households by Race/Ethnicity, the Hispanic population in Anchorage and the Region appears to be under represented in Other Multifamily housing (0%). The Hispanic population appears to be over represented in the very low-income household (0-30% of AMI) at 7.37% in Anchorage and 5.97% in the Region.

The Black population in Anchorage and the Region appears to be under represented in the Multifamily housing at 2.86% for both. The Black population appears to be under represented in the high low-income household (0-80% of AMI) at 8.73% in Anchorage and 6.71% in the Region.

In Anchorage, the Asian or Pacific Islander and Black populations are similar by percentages in the very low-income households (0-30% of AMI) at 11.51% and 11.52% respectively. In the Region the same comparison could be made, the Asian or Pacific Islander and Black populations are similar by percentages in the very low-income households (0-30% of AMI) at 8.48% and 8.92% respectively.

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the Jurisdiction and Region.

HUD map 5 Publicly Supported Housing and Race/Ethnicity identifies that publicly supported housing in the four categories is distributed throughout Anchorage, Eagle River, Chugiak and the Region. The darker shading represents a heavier concentration of Housing Choice Voucher (HCV) Program housing. There are no discernable patterns between the R/ECAP neighborhoods of Mountain View/Government Hill or neighborhoods of high concentrations of ethnicity/poverty and the location of publicly supported housing. The concentration of HCV Program housing is distributed in Anchorage neighborhoods with higher density of Multifamily rental housing.

There is only one publicly supported housing development located in the R/ECAP neighborhoods of Mountain View/Government Hill. The R/ECAP neighborhoods are identified having higher concentration of HCV Program housing.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the Jurisdiction and Region.

HUD map 5 Publicly Supported Housing and Race/Ethnicity identifies the publicly supported housing in the four categories distributed throughout Anchorage, Eagle River, Chugiak and the Region. The map does not identify publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities.

The MOA has no additional HUD or local data to address this question.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the Jurisdiction and Region?

HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	177	25.99%	22.60%	9.60%	15.82%	67.98%	17.98%	11.80%
Non R/ECAP tracts	292	36.08%	13.75%	8.25%	20.27%	49.49%	39.25%	24.57%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	436	31.37%	12.97%	14.15%	27.36%	51.96%	36.03%	17.09%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	180	57.14%	2.86%	0.00%	37.14%	0.00%	81.82%	5.00%
HCV Program								
R/ECAP tracts	369	16.05%	35.53%	12.03%	15.19%	53.80%	11.83%	13.80%
Non R/ECAP tracts	2,442	37.84%	26.44%	7.74%	12.07%	41.16%	21.32%	23.09%
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

The highest percentage of Anchorage households residing in publicly supported housing are elderly ranging from 81.82% in Other Multifamily housing to 21.32% in Housing Choice Voucher (HCV) Program housing. The households with children are the second highest percentage of household residing in publicly supported housing at 51.96% in Project-based Section 8 housing to 0% in Other Multifamily housing. The Anchorage households with disabilities residing in publicly supported housing range from 24.57% in Public Housing to 5.00% in Other Multifamily housing.

The highest percentage of Anchorage households residing in R/ECAP neighborhoods of Mountain View/Government Hill living in publicly supported housing are families with children ranging from 67.98% in Public Housing to 53.90% in Housing Choice Voucher (HCV) Program housing. The elderly households in the R/ECAP neighborhoods are the second highest percentage of household residing in publicly supported housing at 17.98% in Public Housing to 11.83% in HCV Program housing. The households with disabilities residing in publicly supported housing in the R/ECAP neighborhoods range from 13.80% in HCV Program housing to 11.80% in Public Housing.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the Jurisdiction? Describe how these developments differ.

A review of HUD table 8 Publicly Supported Households by Race/Ethnicity indicated that there are some differences among the composition of protected class households in the three public housing categories, Public Housing, Project-based Section 8 and Other Multifamily Housing.

The Alaska Housing and Finance Corporation (AHFC) maintains three (3) Public Housing developments in Anchorage. One (1) Public Housing development, Anchorage Central, has 120 units with no children. Anchorage Central is populated with 51% White residents, 4% Black

residents, 3% Hispanic and 34% Asians or Pacific Islander residents. The Public Housing development, Anchorage East, has 193 units with 68% children. Anchorage East is populated with 26% White residents, 23% Black residents, 10% Hispanic and 16% Asians or Pacific Islander residents. The Public Housing development, Anchorage South, has 177 units with 83% children. Anchorage South is populated with 26% White residents, 21% Black residents, 12% Hispanic and 11% Asians or Pacific Islander residents.

HUD Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category									
Public Housing									
(Anchorage, AK CDBG) Jurisdiction									
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children	
Anchorage Central	AK001	Alaska Housin	120	51%	4%	3%	34%	N/a	
Anchorage East	AK001	Alaska Housin	193	26%	23%	10%	16%	68%	
Anchorage South	AK001	Alaska Housin	177	26%	21%	12%	11%	83%	
Project-Based Section 8									
(Anchorage, AK CDBG) Jurisdiction									
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children	
Jewel Lake Villa	N/a	N/a	123	35%	8%	13%	15%	75%	
Ptarmigan Park	N/a	N/a	17	37%	13%	0%	38%	75%	
Stephens Park Apts	N/a	N/a	31	34%	19%	6%	28%	69%	
Chester Creek Estates	N/a	N/a	56	23%	21%	9%	32%	61%	
Chugach View	N/a	N/a	120	46%	11%	8%	25%	N/a	
Chester Park Estates	N/a	N/a	114	14%	15%	31%	38%	76%	
Other HUD Multifamily Assisted Housing									
(Anchorage, AK CDBG) Jurisdiction									
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children	
Jewel Lake Plaza	N/a	N/a	19	74%	N/a	0%	21%	N/a	
New Neighbors, Inc	N/a	N/a	14	67%	8%	8%	N/a	8%	
A.A.S.C. Housing 1, Inc.	N/a	N/a	11	N/a	N/a	N/a	N/a	N/a	
Independence Park Manor	N/a	N/a	19	37%	N/a	0%	58%	N/a	
Independence Park Manor	N/a	N/a	19	32%	N/a	0%	63%	N/a	
George Sullivan Manor	N/a	N/a	19	47%	N/a	0%	53%	N/a	
Russian Jack Manor	N/a	N/a	19	26%	N/a	0%	63%	N/a	
The Roosevelt, Inc.	N/a	N/a	10	N/a	N/a	N/a	N/a	N/a	
Connolly Square, Inc	N/a	N/a	20	55%	5%	0%	35%	N/a	
Andrew Housing Company	N/a	N/a	10	N/a	N/a	N/a	N/a	N/a	
Commodore Park Plaza	N/a	N/a	24	50%	8%	4%	38%	N/a	
Denali View Senior Housing	N/a	N/a	20	100%	N/a	0%	N/a	N/a	
Hope Community Homes I	N/a	N/a	4	N/a	N/a	N/a	N/a	N/a	
Muldoon Manor	N/a	N/a	19	53%	21%	5%	16%	N/a	
Note 1: For LIHTC properties, this information will be supplied by local knowledge.									
Note 2: Percentages may not add to 100 due to rounding error.									
Note 3: Data Sources: APSH									
Note 4: Refer to the Data Documentation for details (www.hudexchange.info).									

Of the six (6) Project-Based Section 8 developments in Anchorage. One (1) Project-Based Section 8 development, Chugach View, has 120 units with no children and the highest percentage of White residents. Chugach View is populated with 46% White residents, 11% Black residents, 8% Hispanic and 25% Asians or Pacific Islander residents.

The Project-Based Section 8 development, Chester Creek Estates, has 56 units with 61% children and the highest percentage of Black residents. Chester Creek Estates is populated with 23% White residents, 21% Black residents, 9% Hispanic and 32% Asians or Pacific Islander residents.

The Project-Based Section 8 development, Chester Park Estates, has 114 units with 76% children and the highest percentage of Hispanic and Asian or Pacific Islander residents. Chester Park Estates is populated with 14% White residents, 15% Black residents, 31% Hispanic and 38% Asians or Pacific Islander residents.

The Project-Based Section 8 development, Ptarmigan Park, has 17 units with 75% children and one of the two developments with the highest percentage of Asian or Pacific Islander residents. Ptarmigan Park is populated with 37% White residents, 13% Black residents, 0% Hispanic and 38% Asians or Pacific Islander residents.

The fourteen (14) Other Multifamily developments in Anchorage, Eagle River and Chugiak. Of the one (1) Other Multifamily development, New Neighbors Inc., with 14 units has 8% children and is the highest percentage of Hispanic residents. New Neighbors Inc. is populated with 67% White residents, 8% Black residents, 8% Hispanic and 0% Asians or Pacific Islander residents.

The Other Multifamily development, Denali View Senior Housing, has 20 units and 100% White residents. The Other Multifamily development, Muldoon Manor, has 19 units and the highest percentage of Black residents. Muldoon Manor is populated with 53% White residents, 21% Black residents, 5% Hispanic and 16% Asians or Pacific Islander residents.

The Other Multifamily development, Independence Park Manor II, has 19 units and one of the two developments with the highest percentage of Asian or Pacific Islander residents. Independence Park Manor II is populated with 37% White residents, 0% Black residents, 0% Hispanic and 63% Asians or Pacific Islander residents.

The Other Multifamily development, Russian Jack Manor, has 19 units and two of the two developments with the highest percentage of Asian or Pacific Islander residents. Russian Jack Manor is populated with 26% White residents, 0% Black residents, 0% Hispanic and 63% Asians or Pacific Islander residents.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the Jurisdiction and Region.

The MOA has no additional HUD or local data to address this question.

v. Compare the demographics of occupants of developments in the Jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the Jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas

occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Housing Units	#	%
Total housing units	113,032	-
Public Housing	490	0.43%
Project-based Section 8	461	0.41%
Other Multifamily	237	0.21%
HCV Program	2,665	2.36%
Note 1: Data Sources: Decennial Census; APSH		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).		

HUD table 5 Publicly Supported Housing Units by Program Category, identifies 113,032 housing units located in the communities of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna, and Girdwood (Turnagain Arm). Publicly supported housing developments are located in Anchorage, Eagle River, and Chugiak. There are 490 Public Housing units, 461 Project-based Section 8 housing units, 237 Other Multifamily housing units and 2,665 Housing Choice Voucher (HCV) participants located throughout these communities.

A review of HUD table 8 Publicly Supported Households by Race/Ethnicity compared to HUD map 5 Publicly Supported Housing and Race/Ethnicity indicated that there are some differences among the composition of protected class households in the four public housing categories.

The six (6) Project-Based Section 8 developments in Anchorage. One (1) Project-Based Section 8 development, Chugach View, located in Anchorage has 120 units with no children and the highest percentage of White (46%) residents. Chugach View located in 2010 Census Tract 902 is populated with 25.55% White, 21% Black, 11.01% Hispanic and 26.43% Asians or Pacific Islander populations.

The Project-Based Section 8 development, Chester Creek Estates, has 56 units with 61% children and the highest percentage of Black (21%) residents. Chester Creek Estates located in 2010 Census Tract 1702 is populated with 61.4% White, 7.56% Black, 6.74% Hispanic and 6.16% Asians or Pacific Islander populations.

The Project-Based Section 8 development, Chester Park Estates, located in Anchorage has 114 units with 76% children and the highest percentage of Hispanic (31%) and Asian or Pacific Islander (38%) residents. Chester Park Estates located in 2010 Census Tract 802 is populated with 50.8% White, 13.38% Black, 7.11% Hispanic and 12.72% Asians or Pacific Islander populations.

The Project-Based Section 8 development, Ptarmigan Park, located in Anchorage has 17 units with 75% children and one of the two developments with the highest percentage of Asian or

Pacific Islander (38%) residents. Ptarmigan Park located in 2010 Census Tract 902 is populated with 25.55% White, 21% Black, 11.01% Hispanic and 26.43% Asians or Pacific Islander populations.

The fourteen (14) Other Multifamily developments in Anchorage, Eagle River and Chugiak. Of the one (1) Other Multifamily development, New Neighbors Inc., located in Anchorage with 14 units has 8% children and is the highest percentage of Hispanic (8%) residents. New Neighbors Inc. located in 2010 Census Tract 702 is populated with 42.61% White, 14.61% Black, 11.14% Hispanic and 9.58% Asians or Pacific Islander populations.

The Other Multifamily development, Denali View Senior Housing, located in Chugiak has 20 units and 100% White residents. Denali View Senior Housing located in 2010 Census Tract 102 is populated with 83.29% White, 18% Black, 3.76% Hispanic and 1.47% Asians or Pacific Islander populations.

The Other Multifamily development, Muldoon Manor, located in Anchorage has 19 units and the highest percentage of Black (21%) residents. Muldoon Manor located in 2010 Census Tract 1731 is populated with 83.29% White, 7.52% Black, 7.35% Hispanic and 15.8% Asians or Pacific Islander populations.

The Other Multifamily development, Independence Park Manor II, located in Anchorage has 19 units and one of the two developments with the highest percentage of Asian or Pacific Islander (63%) residents. Independence Park Manor II located in 2010 Census Tract 2811 is populated with 54.65% White, 4.91% Black, 10.35% Hispanic and 16.05% Asians or Pacific Islander populations.

The Other Multifamily development, Russian Jack Manor, located in Anchorage has 19 units and two of the two developments with the highest percentage of Asian or Pacific Islander residents. Russian Jack Manor located in 2010 Census Tract 802 is populated with 37.99% White, .66% Black, 13.1% Hispanic and 24.02% Asians or Pacific Islander populations.

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the Jurisdiction and Region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Publicly supported housing are located throughout the communities of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna, and Girdwood (Turnagain Arm). As stated earlier, Anchorage has no readily identifiable areas that experience poor access to opportunity and high exposure to adverse factors. The R/ECAP neighborhood of Mountain View has received a consistent public investment in infrastructure and public facilities in an effort to improve the neighborhood. The R/ECAP neighborhoods of Mountain View/Government Hill are located with many resources such as employment options, proficient schools, public transportation and services.

Neighborhoods that are identified as having high concentrations of ethnicity and concentrations of low to moderate-income households are located either within or in close proximity to areas of high opportunity including transportation services, jobs and proficient schools.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the Jurisdiction and Region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

Alaska Housing Finance Corporation (AHFC) provides safe, quality and affordable Public Housing rental units for low-income Alaskans. Public Housing is available in 13 communities across Alaska including Anchorage. AHFC currently owns and operates more than 1,600 housing units statewide in a variety of bedroom sizes and types.

AHFC has an HCV program in Anchorage. There are an insufficient number of vouchers for the HCV program in Anchorage based on the waiting list demand. In Anchorage, there are nearly 3,000 households with subsidized rent and more than double that number on the waiting list (Public Housing Department at AHFC). As of June 2016 in Anchorage there were over 262 families on the HCV waiting list with a lottery opening on July 1, 2016 and over 5,461 on the waiting list for various AHFC-owned rental assistance units statewide.

Additional factors include the lack of low-income housing options and a low vacancy rate in Anchorage. In Anchorage, for a one-bedroom, 1,116 households are waiting for subsidized rent in 32 one-bedroom units. The turnover is only about eight each year, translating to a wait of more than 40 years list (Public Housing Department at AHFC).

In 2016, the Anchorage average adjusted rent for a 1 bedroom was \$1,259 and an estimated 3.8% vacancy. The Mat-Su Borough average adjusted rent for a 1 bedroom was \$1,224 and an estimated 3.6% vacancy (Rental Survey by Alaska Department of Labor and Workforce Development). With the low vacancy rate in Anchorage, landlords may not accept HCV vouchers and rent to higher income tenants.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Alaska Housing Finance Corporation (AHFC) is a statewide public housing authority. As such, it serves 12 Alaskan communities with HCV. Generally, each AHFC jurisdiction encompasses an area within 50 miles of the local AHFC office.

AHFC conducts briefing classes for new families and continuing participants prior to issuance of a voucher. Each briefing class covers a family's right to either move to another AHFC voucher community or port their voucher if they meet portability requirements. Under its Empowering Choice Housing Program (a special voucher reserved for referrals from the Alaska Network on

Domestic Violence and Sexual Assault), AHFC supports the safety of these families by waiving its rules relating to moves to enable families to seek safe housing in an alternate AHFC HCV community.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the Jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- **Community opposition**
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- **Source of income discrimination**
- Other

The public support has been either silent or opposed to publicly supported housing Public Housing, Project-based Section 8, other Multifamily Housing (Section 202/Senior, Section 811/Disabilities), LIHTC and Housing Choice Vouchers (HCV). Neighborhoods have opposed the Housing First Model of publicly supported housing developments in their neighborhoods. The Housing First Model or similar permanent supported housing provides housing for residents who are chronically homeless persons with disabilities including substance abuse. Neighborhoods are generally silent about other types of publicly supported housing projects in their neighborhoods.

The principal challenges faced by residents with HCV's in acquiring housing are the lack of affordable, accessible and supportive housing in Anchorage and the Region. In addition, when a resident finds housing that meets their needs, private landlords may not accept HCV vouchers.

V. Fair Housing Analysis Section D. Disability and Access Analysis

1. Population Profile

a. *How are persons with disabilities geographically dispersed or concentrated in the Jurisdiction and Region, including R/ECAPs and other segregated areas identified in previous sections?*

HUD map 14 Disability by Type identifies that residents with disabilities live throughout Anchorage with no particular concentration of neighborhoods. In the Region, concentrations of residents with disabilities appear to be in the more populated communities of Wasilla and Palmer.

Disability Type	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction		(Anchorage, AK) Region	
	#	%	#	%
Hearing difficulty	9,317	3.56%	12,521	3.63%
Vision difficulty	5,028	1.92%	6,640	1.93%
Cognitive difficulty	11,790	4.51%	15,392	4.46%
Ambulatory difficulty	14,062	5.38%	19,313	5.60%
Self-care difficulty	6,515	2.49%	8,278	2.40%
Independent living difficulty	8,622	3.30%	11,342	3.29%

Note 1: All % represent a share of the total population within the jurisdiction or region.
 Note 2: Data Sources: ACS
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

HUD table 13 Disability by Type presents data that residents with disabilities in Anchorage as a percentage of the population are similar to the percentages in the Region. Residents with hearing difficulty are 3.56% of Anchorage and 3.63% of the Region populations. Residents with vision difficulty are 1.92% of Anchorage and 1.93% of the Region populations. Residents with cognitive difficulty are 4.51% of Anchorage and 4.46% of the Region populations. Residents with ambulatory difficulty are 5.38% of Anchorage and 5.60% of the Region populations. Residents with self-care difficulty are 2.49% of Anchorage and 2.40% of the Region populations. Residents with independent living difficulty are 3.30% of Anchorage and 3.29% of the Region populations. The difference between Anchorage and the Region for each type of disability is never more than 0.22%.

b. *Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the Jurisdiction and Region.*

HUD map 15 Disability by Age Group identifies that residents with disabilities in different age ranges live throughout Anchorage with no particular concentration of neighborhoods. In the Region, concentrations of residents with disabilities in different age ranges appear to be in the more populated communities of Wasilla and Palmer.

HUD Table 14 - Disability by Age Group				
	(Anchorage, AK CDBG, HOME, ESG) Jurisdiction		(Anchorage, AK) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	2,407	0.92%	3,323	0.96%
age 18-64 with Disabilities	18,144	6.94%	24,143	7.00%
age 65+ with Disabilities	8,503	3.25%	11,629	3.37%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).				

HUD table 14 Disability by Age Group identifies Anchorage having percentages of the population with disabilities in age ranges that are similar to the percentages in the Region. In Anchorage the highest percentage of residents with disabilities are in the 18-54 age range at 6.94%. The second highest age range plus 65 residents with disabilities at 3.25% followed by the age range 5-17 residents with disabilities at .92%. The Region the highest percentage of residents with disabilities are in the 18-54 age range at 7.00%. The second highest age range plus 65 residents with disabilities at 3.37% followed by the age range 5-17 residents with disabilities at .96%. The difference between Anchorage and the Region for each type of disability is never more than 0.12%.

2. Housing Accessibility

a. *Describe whether the Jurisdiction and Region have sufficient affordable, accessible housing in a range of unit sizes.*

The MOA has no additional HUD or local data to address this question.

b. *Describe the areas where affordable accessible housing units are located in the Jurisdiction and Region. Do they align with R/ECAPs or other areas that are segregated?*

The MOA has no additional HUD or local data to address this question.

Low-Income Housing Tax Credit (LIHTC) developments in Anchorage require at least 5% of the units are accessible. The table that follows identifies the location of LIHTC developments in Anchorage neighborhoods including higher populations of race/ethnicity and low-income neighborhoods.

	Project Name	Program Type	Neighborhood
1	Access Apartments	LIHTC	South Anchorage
2	Adelaide SRO Project	LIHTC	Downtown
3	Brighton Park	LIHTC	East Anchorage
4	Chester Creek	LIHTC	Midtown
5	Chester Park	LIHTC	Midtown
6	Creekside Manor Apartments	LIHTC	South Anchorage
7	Discovery Luxury Rentals	LIHTC	South Anchorage
8	Hampstead Heath	LIHTC	South Anchorage

9	Hillpoint Park	LIHTC	Downtown
10	Kenaitze Pointe	LIHTC	East Anchorage
11	Loussac Place	LIHTC	Midtown
12	Loussac Sogn Apartments	LIHTC	Downtown
13	Mountain View Scattered (Phase 1)	LIHTC	Mountain View
14	Ridgeline Terrace	LIHTC	Mountain View
15	Spruce View Apartments	LIHTC	South Anchorage
16	Strawberry Rose Cottages	LIHTC	Jewel/Sand Lake
17	Susitna Square	LIHTC	East Anchorage
18	Mountain View Scattered (Phase 3)	LIHTC	Mountain View
19	Grass Creek	LIHTC	East Anchorage
20	Jewel Lake Villa	LIHTC-Bond	Jewel/Sand Lake
21	325 East 3 rd Avenue	LIHTC	Downtown
22	Mountain View Scattered (Phase 2)	LIHTC-Bond	Mountain View
23	Ridgeline Terrace	LIHTC-Senior	Mountain View
24	Southside Senior	LIHTC-Senior	South Anchorage
25	Tyonek Terrace	LIHTC-Senior	East Anchorage

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the Jurisdiction and Region?

HUD Table 15 - Disability by Publicly Supported Housing Program Category		
(Anchorage, AK CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	93	19.75%
Project-Based Section 8	74	17.09%
Other Multifamily	11	4.78%
HCV Program	599	21.87%
(Anchorage, AK) Region		
Public Housing	93	19.75%
Project-Based Section 8	74	17.09%
Other Multifamily	11	4.78%
HCV Program	727	22.29%
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		
Note 2: Data Sources: ACS		
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).		

HUD table 15 Disability by Publicly Supported Housing Program Category identifies Anchorage having percentages of the population with disabilities in living in publicly supported housing exactly the same as the percentages in the Region, except for the Housing Choice Voucher (HCV) Program with a .42% difference. In Anchorage the highest percentage of residents with disabilities are receiving housing with the HCV Program at 21.87% and the Region at 22.29%. In

Anchorage and the Region the second highest percentage of residents with disabilities at 19.75% are receiving housing at Public Housing. Followed by residents with disabilities at 17.09% receiving housing at Project-based Section 8 housing and 4.78% are receiving housing at Other Multifamily housing in Anchorage and the Region.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. *To what extent do persons with disabilities in or from the Jurisdiction or Region reside in segregated or integrated settings?*

In Anchorage and the Region, there are no large psychiatric hospitals, development centers, other institutions, board and care homes, group homes, nursing homes and personal care homes. Most persons with disabilities needing assisted-living reside in single-family residences that are scattered throughout Anchorage and the Mat-Su Borough. There are only six assisted-living facilities in Anchorage with 20 beds or more. The largest assisted-living facility is the Pioneer Home. Most of the other large assisted-living homes in Alaska are administered by the Division of Alaska Pioneer Homes.

In Anchorage, there are 490 Public Housing program units, of which 120 serve elderly/disabled populations exclusively. There are 137 Project-based Section 8 new Multifamily housing program units, of which 120 serve elderly/disabled populations exclusively. There are monthly rental subsidy equivalent to 46 Project-based vouchers for persons at the Karluk Manor, a Housing First Model, targeting chronically homeless individuals with disabilities including substance abuse and alcohol addictions.

b. *Describe the range of options for persons with disabilities to access affordable housing and supportive services in the Jurisdiction and Region.*

Access Alaska is a private, non-profit, consumer-controlled organization that provides independent living services to people who experience a disability. As an Independent Living Center, their mission is to encourage and promote the total integration of people who experience a disability and Alaskan elders to live independently in the community of their choice. Through assistance and support individuals with disabilities identify and obtain needed services in an effort to maintain their independence as opposed to living in an institution.

Statewide Independent Living Council of Alaska (SILC) is made up of representatives, the majority of whom have disabilities, from around the State. Council members are appointed by the Governor. The SILC is a non-profit organization; it is a consumer controlled, non-governmental organization which develops, monitors and evaluates the federally mandated Alaska State Plan for Independent Living. The SILC promotes the independent living philosophy statewide, and provides support and technical assistance to the entire network of Centers for Independent Living (CILs).

The Arc of Anchorage is a private, non-profit organization dedicated to serving children and adults who experience developmental disabilities or mental health issues so they can lead rich,

full, satisfying lives of dignity and purpose. The Arc of Anchorage is a chapter of The Arc of the United States, a grassroots organization with more than 140,000 members who are affiliated with nearly one thousand state and local chapters across the country. The Arc of Anchorage provides support that encourages independence and participation in the community, allowing adults with developmental disabilities to live on their own, with roommates, and/or staff. The Arc also offers in-home assistance and respite care for children with developmental disabilities or complex medical conditions who live with their families or with foster families.

Hope Community Resources Inc. is a non-profit organization providing community supports to hundreds of individuals and families who experience intellectual and developmental disabilities, traumatic brain injury and mental health challenges. The clients range in age from infancy to the elderly, are of diverse ethnic background, and experience a range of disabilities. Each person is individual and unique in the supports they need and request. Hope Community Resources Inc. owns and/or leases over 50 assisted-living homes and apartment clusters providing supported living for adults. In addition to adult services, there is a growing focus on family services, including foster care supports. It is also home to the Discovery Center at Hope, which houses Hope Studios and Gallery as well as a recreational facility that offers a variety of activities, classes and camps throughout the year.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the Jurisdiction and Region? Identify major barriers faced concerning:

- i. Government services and facilities*
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)*
- iii. Transportation*
- iv. Proficient schools and educational programs*
- v. Jobs*

The principal challenge faced by persons with disabilities in acquiring housing are the lack of affordable, accessible and supportive housing in Anchorage and the Region. The housing assistance application forms and approval process can be burdensome for persons with disabilities. In addition, when a person with disabilities finds housing that meets their needs, the landlords may not accept Housing Choice Vouchers (HCV) or want to rent to someone with a disability (Housing Barriers Report 2015 from the Governor's Council on Disabilities & Special Education).

The MOA Public Transportation provides AnchorRIDES which is the Anchorage Coordinated Paratransit System providing accessible Dial-A-Ride transportation for eligible persons through pre-scheduled trip reservations for local, state and non-profit organizations. The MOA Public Transportation Department plans to implement a new ridership concept in August 2017 that will have varying impacts on residents with disabilities who rely on public transit to get to jobs, daycares, schools and services.

Anchorage is the only community in the Municipality of Anchorage that has taxi service. The number of accessible taxi cabs is inadequate to meet the demand by residents with disabilities per the Housing Barriers Report 2015 from the Governor's Council on Disabilities & Special Education. During peak daytime hours, residents with disabilities may have long wait times.

The MOA has no additional HUD data to address this question.

b. Describe the processes that exist in the Jurisdiction and Region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

For persons with disabilities to request and obtain reasonable accommodations related to transportation accessibility, the person would contact the MOA Transportation Department and Planning Department or attend a public meeting with the Planning & Zoning Commission or the Anchorage Metropolitan Area Transportation Solutions (AMATS) Citizens Advisory Committee.

The Planning & Zoning Commission reviews and recommends transportation planning documents and road designs to the AMATS and the Assembly. The commission develops, reviews, and recommends policies, plans, and ordinances to the Municipal Assembly, to implement the municipal function of planning for the economic, social, and land use needs of the community.

The Citizens Advisory Committee (CAC) was established to review, comment, and guide the Policy Committee, through the Technical Advisory Committee on matters related to transportation. These efforts include, but are not limited to the Unified Planning Work Program, the Metropolitan Transportation Plan, the Transportation Improvement Program, and the Public Participation Plan.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the Jurisdiction and Region.

The MOA has no additional HUD or local data to address this question.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the Jurisdiction and Region.

HUD table 9 Demographics of Households with Disproportionate Housing Needs, HUD table 10 Demographics of Households with Severe Housing Cost Burden and HUD map 6 Housing Problems identifies disproportionate housing needs in Anchorage and the Region. The data is not specific to residents with disabilities, however, a highly probable conclusion is that disproportionate housing needs are experienced by residents with certain types of disabilities in Anchorage and the Region at a similar rate to low-income households in Anchorage and the

Region. The greatest contributing factor is the general lack of affordable and accessible housing units for residents with disabilities and low-income households.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the Jurisdiction and Region including those affecting persons with disabilities with other protected characteristics.

The principal challenge faced by persons with disabilities in acquiring housing are the lack of affordable, accessible and supportive housing in Anchorage and the Region. The housing assistance application forms and approval process can be burdensome for persons with disabilities. In addition, when a person with disabilities finds housing that meets their needs, the landlords may not accept Housing Choice Vouchers (HCV) or want to rent to someone with a disability (Housing Barriers Report 2015 from the Governor’s Council on Disabilities & Special Education).

The housing assistance programs may not always include considerations that residents with intellectual or developmental disabilities have families of their own, or wish to one day. Housing programs for resident with disabilities should accommodate larger family size rather than one-bedroom apartments.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

For some residents using publicly supported housing, like seniors or those with disabilities, long-term stable housing assistance is critical. Alaska Housing Finance Corporation (AHFC) Public Housing Department developed the Classic Program to meet these resident’s needs and simplify the process. In the Classic Program a family’s shelter burden drops from 30% to 28.5% of gross income. The decrease allows for a streamlined rent calculation with no deductions and housing costs that are stable for a three-year period. To be part of the Classic Program, household members must be age 62 or older or adult household members must be identified as persons with a disability. Live-in attendants and full-time student dependents younger than age 24 will not disqualify a family from participating in the Classic Program.

AHFC Public Housing Department’s Moving Home Program is a voucher set-aside program for persons with disabilities directly referred from the State of Alaska Department of Health and Social Services with a 150 vouchers statewide (70 vouchers in Anchorage).

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the Jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- **Lack of affordable, accessible housing in range of unit sizes**
- Lack of affordable, integrated housing for individuals who need supportive services
- **Lack of assistance for housing accessibility modifications**
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

The housing stock in Alaska is low. In Anchorage alone, the vacancy rate has fallen below the “ideal” rate of 5% and currently is at 3%. Anchorage would need approximately 900 new units built per year; however, only 350 units are typically built annually (Fison & Associates 2015:20). The accessible housing stock is even lower. Alaska Housing Finance Corporation’s statewide survey of rental property managers reported that nearly 40% of respondents indicated that 0% of their units were accessible or they refused to answer the question. Participants in the survey recommended that universal design be incentivized so that all new housing stock includes accessible features.

The lack of affordable housing in the Anchorage area is evidenced by the very low vacancy rates. Many times this is most acutely felt by low-income residents and residents with disabilities. In particular, the waiting list in Anchorage indicates that one and two bedroom waiting lists are in the highest demand, and units that provide accessible features for the disabled are very much needed.

V. Fair Housing Analysis Section E. Enforcement, Outreach Capacity and Resources Analysis

1. *List and summarize any of the following that have not been resolved:*

- *A charge or letter of finding from HUD concerning a violation of a civil rights-related law;*
- *A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;*
- *Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;*
- *A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;*
- *A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or*
- *A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.*

MOA has no unresolved HUD civil rights violations, no letters of findings, claims or lawsuits by the Department of Justice and no False Claims Act allegations.

2. *Describe any state or local fair housing laws. What characteristics are protected under each law?*

The Alaska State Statutes (AS §§18.80.210, 240) prohibits discrimination based on race, color, national origin, religion, sex, disability, marital status, changes in marital status, pregnancy and age. The State statutes adds marital status, changes in marital status, pregnancy and age protected groups to the Federal Fair Housing Act. The State drops familial status from the Federal Fair Housing Act. The State has no exemptions.

The Anchorage Municipal Code (AMC §§5.20.020, 5.25.025) prohibits discrimination based on race, color, national origin, religion, sex, disability, familial status, marital status, sexual orientation, gender identity and age. The Municipal codes add sexual orientation and gender identity to the State statutes and Federal Fair Housing Act. There are two Municipal exemptions: owner/lessor/manager occupied building with 4 units or less; and, housing owned/operated by religion organization or private club for non-commercial purposes.

3. *Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.*

In the Municipality there are six agencies and organizations that may assist in fair housing analysis and investigation: Alaska Legal Services Corporation, Alaska State Human Rights Commission, Anchorage Disability Law Center, Anchorage Equal Rights Commission, HUD and Ombudsman of Anchorage.

The Alaska Legal Services Corporation (ALSC) administers the Fair Housing Enforcement Project that is Alaska's only statewide full-service fair housing organization. ALSC works to eliminate housing discrimination and to ensure equal housing opportunity for all people in Alaska through education, outreach, public policy initiatives, and enforcement. The Fair Housing Enforcement Project provides services to members of all protected classes, with special emphasis upon underserved areas and populations including Alaska Natives; immigrants; residents who are non-English speaking or have limited English proficiency; rural residents; persons with disabilities; homeless individuals; and persons residing in areas with large concentrations of people of color. All fair housing services are provided free of charge. There are no income eligibility requirements.

The Alaska State Human Rights Commission employs staff that accepts complaints of discrimination from persons alleging violations of the Alaska Human Rights Law; investigates complaints in a fair and impartial manner; attempts early settlement of complaints whenever possible; dismisses complaints when no violation of the Alaska Human Rights Law is found; conciliates complaints when staff finds substantial evidence that the Alaska Human Rights Law has been violated; gives technical assistance and advice on the Alaska Human Rights Law; and conducts workshops and training on the Alaska Human Rights Law.

In addition, the commissioners of Alaska State Human Rights Commission hold public hearings to consider cases where conciliation efforts have failed; issue final decisions and orders applying the Alaska Human Rights Law to cases; order back pay, reinstatement, or other appropriate relief to complainants; order the elimination of discriminatory practices; and enforce commission decisions and orders in the Alaska courts.

The Anchorage Disability Law Center is an independent non-profit law firm providing legal advocacy for people with disabilities living in Alaska. The mission of the Anchorage Disability Law Center is to provide protection and advocacy services to Alaskans with disabilities through legal representation, education and strategic advocacy.

The Anchorage Equal Rights Commission (AERC) mission is to enforce federal and municipal anti-discrimination laws and provide equal opportunity to all persons in Anchorage. The AERC provides free and confidential services to the public in cases involving discrimination and harassment. In appropriate cases, the AERC staff prepares a complaint of discrimination for client's signature and impartially investigates allegations. In cases that are outside of the commission's jurisdiction, the staff may make referrals to other organizations that can assist.

HUD investigates complaints of housing discrimination based on race, color, religion, national origin, sex, disability, or familial status. At no cost, HUD will investigate complaints and try to conciliate the matter with both parties. The mission of the HUD's Office of Fair Housing and Equal Opportunity (FHEO) is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of federal fair housing policies and laws. FHEO protects people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. In addition, housing providers that receive

HUD funding, have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to HUD program regulations intended to ensure equal access of LGBT persons.

The Municipality of Anchorage's Ombudsman's Office was established in addition to other remedies or rights of appeal, as an independent, impartial municipal office, readily available to the public, responsible to the Assembly, empowered to investigate the acts of municipal agencies and the Anchorage School District, and to recommend appropriate changes toward the goals of safeguarding the rights of persons and of promoting higher standards of competency, efficiency, and equity in the provision of municipal services (A.M.C. Chapter 2.60). The office was established in 1977 by AO 1977-94.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the Jurisdiction and Region.

The MOA has no additional relevant information about fair housing enforcement, outreach capacity, and resources in Anchorage and the Region.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The MOA awards an annual agreement with HUD Community Development Block Grant (CDBG) funds to Alaska Legal Services Corporation to assist low-income individuals and families living in the communities of the Municipality with fair housing legal counseling services.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- **Lack of local private fair housing outreach and enforcement**
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

In Anchorage and the Region, Alaska Legal Services Corporation is funded by HUD for advocacy, education and enforcement. The MOA has no funding for audit testing and as such no good data on the extent of fair housing violations. There is a lack of resources for fair housing agencies and organizations and lack of private fair housing outreach and enforcement. None of the fair housing enforcement agencies reported any patterns of substantiated discrimination violations of the fair housing laws in Anchorage in 2016.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Contributing factors to fair housing issues in the Municipality of Anchorage include:

1. Availability of affordable and accessible units in a range of sizes
2. Lack of access to opportunity due to high housing costs
3. Displacement of residents due to economic pressures
4. Land use and zoning laws
5. Loss of affordable housing
6. Lack of assistance for housing accessibility modifications
7. Sources of income discrimination
8. Availability, type, frequency, and reliability of public transportation
9. Community opposition
10. Lack of local private fair housing outreach and enforcement

The contributing factors listed above are listed in order of priority with #1 being the highest priority and #10 being the lowest priority.

1. Lack of affordable and accessible housing in a range of unit sizes.

The housing stock in Alaska is low. In Anchorage alone, the vacancy rate has fallen below the “ideal” rate of 5% and currently is at 3%. Anchorage would need approximately 900 new units built per year; however, only 350 units are typically built annually (Fison & Associates 2015:20). The accessible housing stock is even lower. Alaska Housing Finance Corporation’s statewide survey of rental property managers reported that nearly 40% of respondents indicated that 0% of their units were accessible or they refused to answer the question. Participants in the survey recommended that universal design be incentivized so that all new housing stock includes accessible features.

The lack of affordable housing in the Anchorage area is evidenced by the very low vacancy rates. Many times this is most acutely felt by low-income residents and residents with disabilities. In particular, the waiting list in Anchorage indicates that one and two bedroom

waiting lists are in the highest demand, and units that provide accessible features for the disabled are very much needed.

Additional factors include the lack of low-income housing options and a low vacancy rate in Anchorage. In Anchorage, for a one-bedroom, 1,116 households are waiting for subsidized rent in 32 one-bedroom units. The turnover is only about eight each year, translating to a wait of more than 40 years list (Public Housing Department at Alaska Housing Finance Corporation).

2. Lack of access to opportunity due to high housing costs.

Rent in the Anchorage market is very expensive and many low-income individuals have a difficult time paying rent at current market rates while still being able to afford other essentials of life such as food and medical care. In 2016 the Anchorage average adjusted rent for a one bedroom was \$1,259 and an estimated 3.8% vacancy (Rental Survey by Alaska Department of Labor and Workforce Development). The average rent for a one-bedroom apartment in Anchorage increased from \$1,112 in 2015 to \$1,259 in 2016 (Rental Survey by Alaska Department of Labor and Workforce Development).

Approximately half of Anchorage residents are devoting 35-75% of their income on housing. (United Way of Anchorage and Fison & Associates). In Anchorage, there are nearly 3,000 households with subsidized rent and more than double that number on the waiting list (Public Housing Department at Alaska Housing Finance Corporation). Without some type of financial assistance, individuals experiencing homelessness cannot afford housing if it becomes available.

3. Displacement of residents due to economic pressures. The high demand for housing in Anchorage and in the Region is causing displacement of low-income persons including protected classes of residents due to economic pressures and loss of affordable housing due to re-development. As a result, land use, zoning and occupancy restrictions can have a significant impact on the Anchorage segregated housing patterns. Housing development has to be affordable if rent and home ownership are going to be affordable for low and moderate-income residents for all race/ethnicity.

4. Land Use and Zoning Laws. The Municipality's Planning Department, Anchorage 2040 Land Use Plan, was adopted by MOA in February 2016. The plan's key growth strategies include housing and neighborhoods as defined as providing a diverse supply of affordable, quality housing that meets the needs and preferences of the city's residents, at all income levels, in safe and livable neighborhoods.

The Anchorage 2040 Land Use Plan identified that housing of all types and sizes are needed in order to provide a range of housing opportunities for all residents. The 2012 Anchorage Housing Market Analysis identified that the remaining supply of vacant buildable lands in the Anchorage area must be more efficiently developed. Housing will need to be more "compact" in form if there is to be enough housing to meet future need. This compact form includes small-lot "cottage" homes, accessory dwellings where appropriate, attached dwellings (duplex and triplex), townhouses, multifamily, and residential units built as part of commercial developments (mixed-use).

5. Loss of affordable housing.

The lack of affordable housing in Anchorage and the Region is evidenced by the very low homeowner rates of all minority race/ethnicity populations. Many times this is most acutely felt by renters who are low-income residents and residents with large families. In the rental market, the waiting list in Anchorage indicates that one and two bedroom waiting lists are in the highest demand, and units with three or more bedrooms are very much needed.

Land that is available to develop or re-develop in Anchorage is limited. Land use and zoning need to support mixed-income housing development if Anchorage is going to address income segregated housing patterns. Occupancy restrictions can help or inhibit the housing development of higher density housing which can reduce the cost of housing development. Family size may be influenced by the ethnicity of the parents so there is a need for housing development with 3 or more bedrooms that is affordable for rent or home ownership.

6. Lack of assistance for housing accessibility modifications.

The principal challenge faced by residents with disabilities in acquiring housing are the lack of affordable, accessible and supportive housing in Anchorage and the Region (Housing Barriers Report 2015 from the Governor's Council on Disabilities & Special Education).

7. Sources of income discrimination.

The principal challenges faced by residents with Housing Choice Vouchers (HCV) in acquiring housing are the lack of affordable, accessible and supportive housing in Anchorage and the Region. In addition, when a resident finds housing that meets their needs, private landlords may not accept HCV.

Alaska prisoners are disproportionately a minority race/ethnicity. Consequently, criminal records-based barriers to housing are likely to have a disproportionate impact on minority housing seekers. Given these barriers, incarceration puts returning prisoners at greater risk of homelessness. A certain proportion of incoming prisoners were homeless before their incarceration, and at least as many end up homeless for some period of time after leaving prison. For those with histories of mental illness, the likelihood is still greater. Nationally, surveys of homeless assistance providers and individuals who use their services have found that about half of currently homeless clients had been in jail or prison at some point in their lives. Parolees without stable housing may face a higher risk of parole failure, whether through re-arrest for a new crime or failure to meet basic parole requirements (The Alaska Department of Corrections Recidivism Reduction Plan dated March 2015).

8. Availability, type, frequency, and reliability of public transportation.

The MOA Public Transportation Department plans to implement a new ridership concept in August 2017. Whichever ridership concept that the MOA's Public Transportation Department implements may have varying impacts on residents who rely on public transit to get to jobs, daycares, schools, entertainment and services. The impact may be positive when residents have direct access to more frequent bus service every 15 minutes instead of every 60 minutes. The impact may be negative when residents have to walk ¼ to half mile to a bus stop or no longer have access to public transit in their neighborhoods.

9. Community Opposition.

The public support has been either silent or opposed to publicly supported housing Public Housing, Project-based Section 8, other Multifamily Housing (Section 202/Senior, Section 811/Disabilities), LIHTC, and Housing Choice Vouchers (HCV). Neighborhoods have opposed the Housing First Model of publicly supported housing developments in their neighborhoods. The Housing First Model or similar permanent supported housing provides housing for residents who are chronically homeless persons with disabilities including substance abuse. Neighborhoods are generally silent about other types of publicly supported housing projects in their neighborhoods.

Some neighborhoods in Anchorage oppose changes in land use, zoning and occupancy restrictions that result in these neighborhoods not being areas to develop or re-develop affordable housing for moderate to low-income residents. For example, when a neighborhood does not have access to municipal water and sewer in their neighborhood, housing development costs increase due to the cost of including a water well and septic systems.

10. Lack of local private fair housing outreach and enforcement.

In Anchorage and the Region, Alaska Legal Services Corporation is funded by HUD for advocacy, education and enforcement. The MOA has no funding for audit testing and as such no good data on the extent of fair housing violations. There is a lack of resources for fair housing agencies and organizations and lack of private fair housing outreach and enforcement.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

A1 Goal: Consider actions that will affirmatively further fair housing in decisions regarding land use and allocation of housing opportunities, and regarding zoning or land use regulations which may inhibit the development of housing for persons in protected classes.

Contributing Factors:

Availability of affordable and accessible units in range of sizes
Displacement of residents due to economic pressures
Land use and zoning laws
Loss of affordable housing
Community opposition

Fair Housing Issues:

Disproportionate housing needs
Disparities in access to opportunity

Discussion: The projected population growth of Anchorage will require better use of existing lands and public infrastructure. Infill development and redevelopment can put residents closer to employment and commercial centers, thereby reducing impacts on transportation systems, boosting public transit, supporting local businesses, and creating more mixed-income neighborhoods.

MOA decisions and actions on land use and infrastructure improvements play an important role in housing development within land use areas identified for growth. Future targeted area rezoning and/or lot consolidation help secure land use areas for new housing development. Future amendments to Title 21 development codes and review procedures need to encourage compact forms of housing that is affordable and accessible housing. Consistent decisions on rezones and conditional use applications with a focus on protection and preserving scarce residential lands for housing development should be a priority. Coordinated capital improvement decisions further enhance the identity and character of existing urban neighborhoods that have a traditional urban street grid and sidewalks, a small lot pattern, served by urban water and sewers and are mixed-income neighborhoods.

A1 Metrics, Milestones and Timeframes for Achievements: DHHS will budget a portion of HUD CDBG grant funds for rehabilitation for health and safety in housing owned by low-income residents in the Municipality of Anchorage each year of the 5 years of the AFH Plan.

A1 Metrics, Milestones and Timeframes for Achievements: MOA DHHS, Planning and Transportation Departments and Alaska Housing Finance Corporation will meet at least twice a year to evaluate and monitor barriers to fair housing and the progress of mix-income, affordable and accessible housing development in the Municipality of Anchorage.

A1 Metrics, Milestones and Timeframes for Achievements: MOA DHHS and the Department of Real Estate will explore options to establish and fund a Housing Trust Fund to increase affordable housing development in Municipality of Anchorage in year 1 and 2 for the AFH plan.

A1 Outcome: An increase in the number of affordable and accessible housing stock in the Municipality of Anchorage at the end of 2022. First need to establish existing affordable and accessible housing stock by the beginning of 2020.

A1 Responsible Program Participant(s): MOA DHHS, Planning Department, Transportation Department, Real Estate Department and Alaska Housing Finance Corporation.

B1 Goal: Promote balanced neighborhoods with diverse infill housing, and provide opportunities for development of affordable and accessible housing that avoids creating areas of concentrated low-income housing.

Contributing Factors:

Availability of affordable and accessible units in range of sizes
Lack of access to opportunity due to high housing costs
Land use and zoning laws
Loss of affordable housing

Community opposition

Fair Housing Issues:

Disproportionate housing needs
Disparities in access to opportunity

Discussion: MOA decisions and actions on land use and infrastructure improvements play an important role in affordable and accessible housing development within land use areas identified for growth. Future amendments to Title 21 development codes and review procedures need to encourage compact forms of housing that is affordable and accessible housing. These housing development decisions should include consideration that many people with families of their own, or wish to one day, should accommodate larger family size rather than one-bedroom apartments.

B1 Metrics, Milestones and Timeframes for Achievements: MOA will co-sponsor with AHFC a Universal Design training in Anchorage for architect and housing developers once during the 5 years of the AFH Plan.

B1 Metrics, Milestones and Timeframes for Achievements: MOA DHHS, Planning and Transportation Departments and Alaska Housing Finance Corporation will meet at least twice a year to evaluate and monitor barriers to fair housing and the progress of mix-income, affordable and accessible housing development in the Municipality of Anchorage.

B1 Outcome: Affordable housing developers will increase the number of fully assessable units by 10% of the required HUD limit on all development housing projects at the end of 5 years.

B1 Responsible Program Participant(s): MOA DHHS, Planning and Transportation Departments and Alaska Housing Finance Corporation.

C1 Goal: Expand and market housing assistance programs for the protected classes of the residents.

Contributing Factors:

Availability of affordable and accessible units in range of sizes
Lack of access to opportunity due to high housing costs
Displacement of residents due to economic pressures
Lack of assistance for housing accessibility modifications

Fair Housing Issues:

Disparities in access to community assets and exposure to adverse community factors
Disparities in access to opportunity

Discussion: Anchorage residents indicated trouble finding information about housing assistance programs and that the application and approval processes were burdensome. MOA decisions and actions can play an important role in increasing and simplifying housing assistance programs for residents with disabilities. An important part of increasing housing assistance programs are

widespread advertisement, so that residents can learn about their options and have opportunities for mobility. Developing an accessible housing registry, or some other centrally located source of information where residents with disabilities can easily find housing that fits their needs.

C1 Metrics, Milestones and Timeframes for Achievements: MOA DHHS will collaborate with Alaska Housing Finance Corporation's Public Housing Department on advertising, educating and developing an accessible housing registry for residents on housing assistance programs available in the Municipality of Anchorage.

C1 Metrics, Milestones and Timeframes for Achievements: MOA will support and assist the State Department of Health and Social Services on expanding Medicaid services for home and community based programs.

C1 Outcome: An accessible housing registry will be available on the Alaska Housing Finance Corporation housing registry at the beginning of 2020.

C1 Outcome: Medicaid services for home and community base programs will be expanded at the end of 2020.

C1 Responsible Program Participant(s): MOA DHHS, Alaska Housing Finance Corporation's Public Housing Department, and Continuum of Care Landlord Liaison.

C2 Goal: Facilitate access to safe, affordable and supportive housing upon prisoner reentry into the community.

Contributing Factors:

Sources of income discrimination

Lack of local private fair housing outreach and enforcement

Fair Housing Issues:

Disproportionate housing needs

Disparities in access to opportunity

Discussion: There are housing providers, both subsidized housing providers and private landlords that have overly broad policies that are limiting access to housing to re-entering citizens who have already paid their debt to society. MOA decisions and actions play an important role in the policies that take an individualized assessment of the crime that was committed, when it was committed and other mitigating factors that might be present so that the safety of housing provider staff and residents is ensured while providing better access to housing for re-entering citizens.

MOA's fair housing policies could include developing guidelines for housing providers and landlords to have formal written rules and agreements defining the standard practice for screening re-entering citizens as potential tenants. In order to make certain that returning citizens are not discharged from prison into homelessness, citizens leaving prison without a documented

housing plan and those with histories of homelessness are included among the homeless priority population in order to facilitate their access to supportive housing and other housing services.

C2 Metrics, Milestones and Timeframes for Achievements: MOA Anchorage Equal Rights Commission and DHHS will work with Alaska Legal Services Corporation to develop and distribute guidelines for housing providers and landlords defining standard practices for screening re-entering citizens as potential tenants during the 5 years of the AFH Plan.

C2 Outcome: Guidelines for housing providers and landlords that define standards practices for screening re-entering citizens will be available at the beginning of 2020.

C2 Responsible Program Participant(s): MOA DHHS, Anchorage Equal Rights Commission and Alaska Legal Services Corporation.

D1 Goal: Partner with other agencies to provide public education about the provisions of the Fair Housing Act and Municipal law to housing professionals, landlords, renters and homebuyers about protected classes.

Contributing Factors:

Sources of income discrimination

Lack of local private fair housing outreach and enforcement

Fair Housing Issues:

Disproportionate housing needs

Disparities in access to opportunity

Discussion: A barrier to fair housing choice is private landlords that are not accepting vouchers. In fair housing laws this could be considered a source of income discrimination. Income discrimination also might be limiting access to areas of opportunity in Anchorage if landlords in certain neighborhoods tend to not accept vouchers.

The 2015 AHFC's housing survey found that only 30% of property managers knew that it was illegal to discriminate against a potential renter based on their disability status. This is a change from AHFC's 2010 data, where property managers at that time were more likely to report disability as a form of illegal discrimination.

Because discrimination appears to be occurring (however underreported), MOA decisions and actions play an important role in increasing and improving training of landlords and property managers on fair housing laws and how to make reasonable accommodations for a variety of disabilities.

D1 Metrics, Milestones and Timeframes for Achievements: MOA will plan and participate in Fair Housing Month every April with Alaska Legal Services Corporation, Alaska Housing Finance Corporation and the local HUD office during the 5 years of the AFH Plan.

D1 Metrics, Milestones and Timeframes for Achievements: MOA will promote fair housing topics on the front page of the MOA website during the 5 years of the AFH Plan.

D1 Outcome: Guidelines for housing providers and landlords that define standard practices for screening re-entering citizens will be available at the beginning of 2020.

D1 Responsible Program Participant(s): MOA DHHS, Alaska Legal Services Corporation, Alaska Housing Finance Corporation and the local HUD office.

D2 Goal: Expand the educational and marketing materials of fair housing laws available in English and the top four languages spoken in Anchorage (Tagalog, Spanish, Korean, and Tongan).

Contributing Factors:

Lack of access to opportunity due to high housing costs

Displacement of residents due to economic pressures

Fair Housing Issues:

Disproportionate housing needs

Disparities in access to opportunity

Discussion: MOA decisions and actions play an important part of developing housing assistance programs advertisement in the top four languages spoken in Anchorage, so that LEP residents can learn about their options and have opportunities for mobility. Developing a housing registry, or some other centrally located source of information in the top four languages spoken in Anchorage where LEP residents can easily find housing that fits their needs.

D2 Metrics, Milestones and Timeframes for Achievements: MOA DHHS will collaborate with Alaska Housing Finance Corporation's Public Housing Department on developing marketing materials, advertising and educating the community on available housing assistance programs.

D2 Outcome: Residents of the Municipality of Anchorage with LEP will have quarterly access to fair housing education materials and a better understanding of housing options.

D2 Responsible Program Participant(s): MOA DHHS and Alaska Housing Finance Corporation's Public Housing Department.

Appendix A – List of HUD and Local Data Sources

All grant recipients must use the HUD provided data, which includes data for the jurisdictions and regions, to complete the AFH plan. HUD provided data will help grant recipients assess local fair housing issues and contributing factors and set priorities and goals to overcome them. The HUD provided data for Anchorage is located at:

<https://www.hudexchange.info/resource/4867/affh-data-and-mapping-tool/>

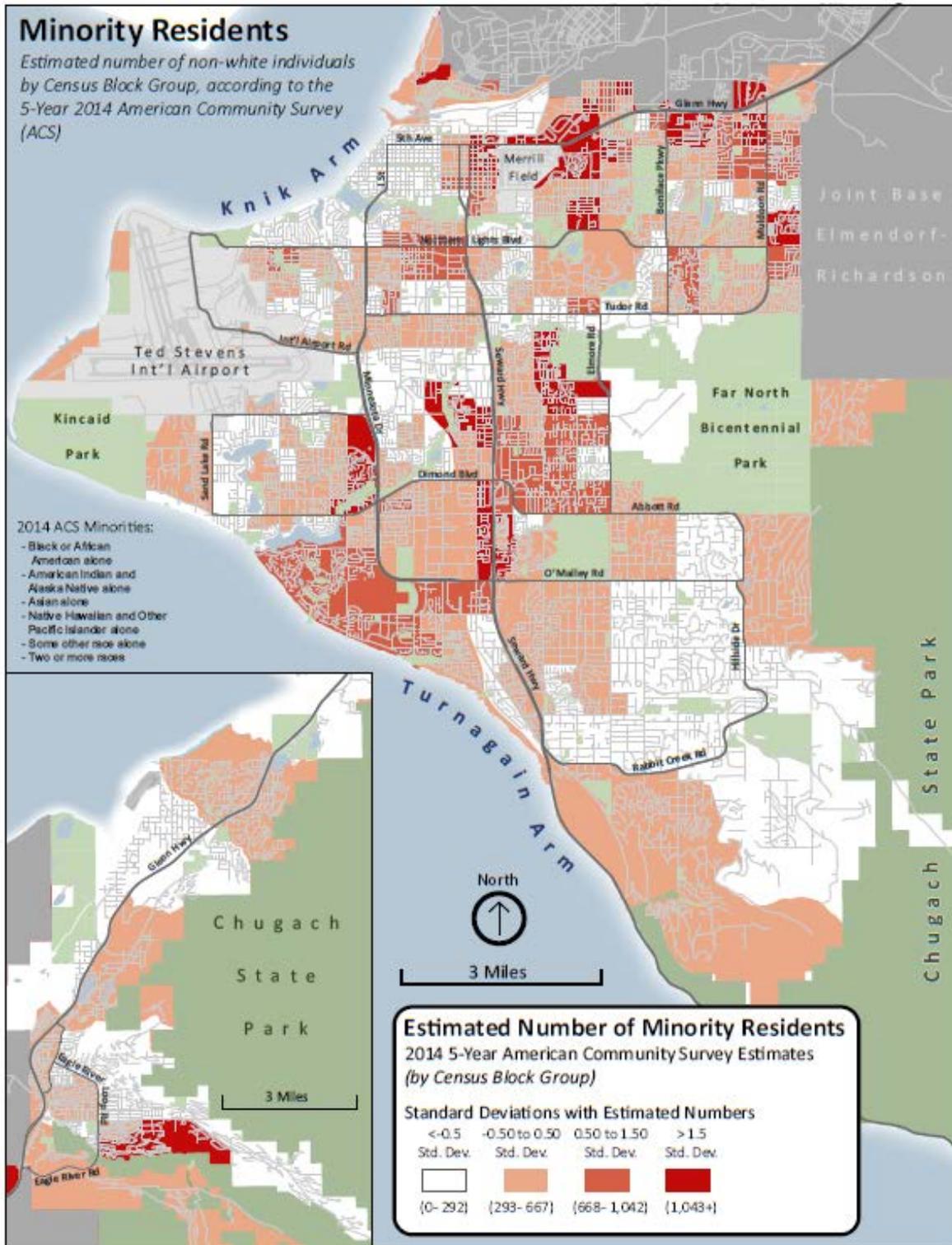
Certain HUD provided data has limitations, including limitations in how the data applies to geographic areas with different characteristics (e.g. minority and low-income access to schools, jobs and public transportation). For this reason, MOA supplemented the HUD provided data with current local data and knowledge citing local data websites in the AFH plan. The Census Block Group Anchorage maps are according to the 5-Year 2014 American Community Survey can be found at:

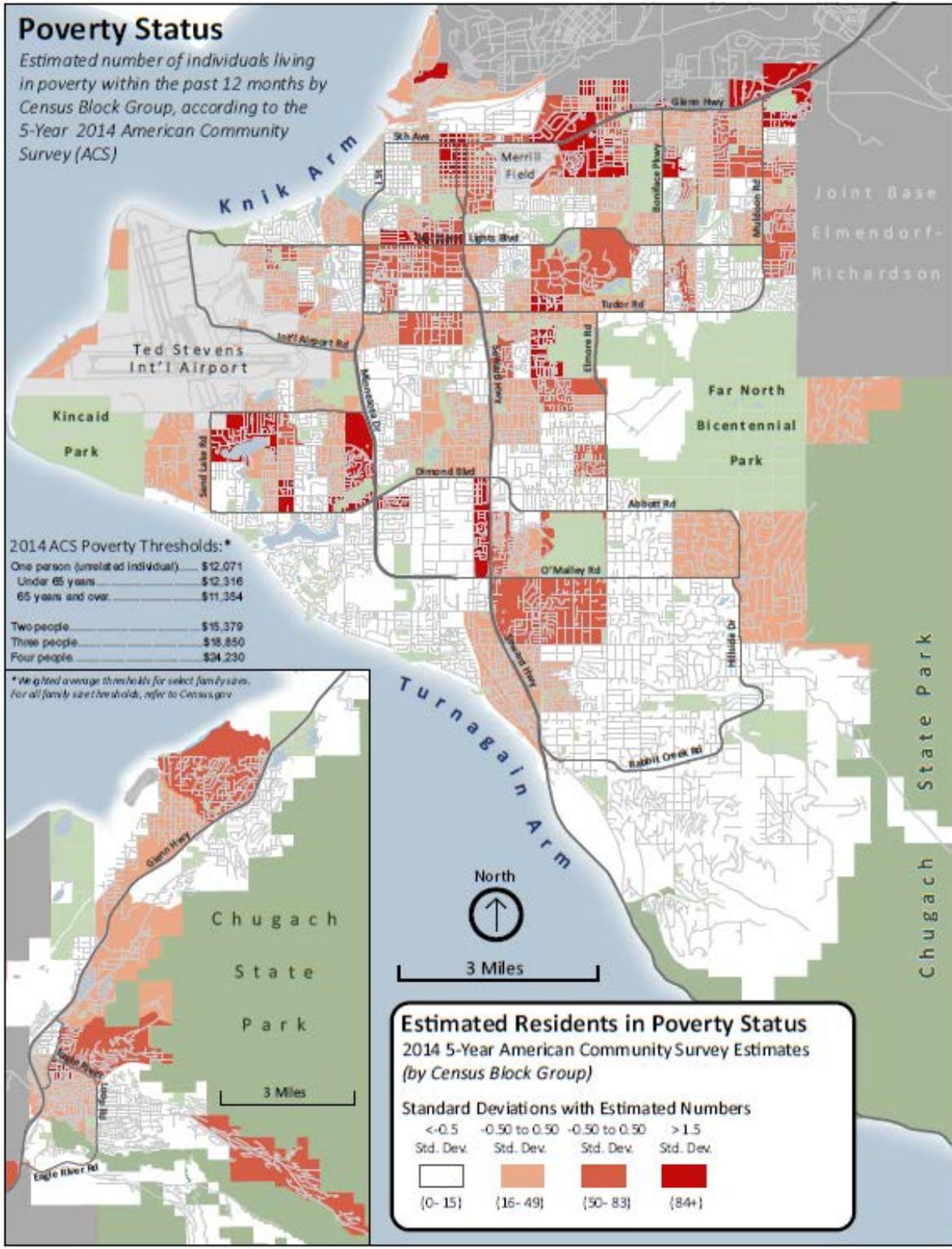
https://www.dropbox.com/sh/4ry6t82rgg7a4yl/AABI5Y4f_UsgNqUkNAVQe4qna?dl=0

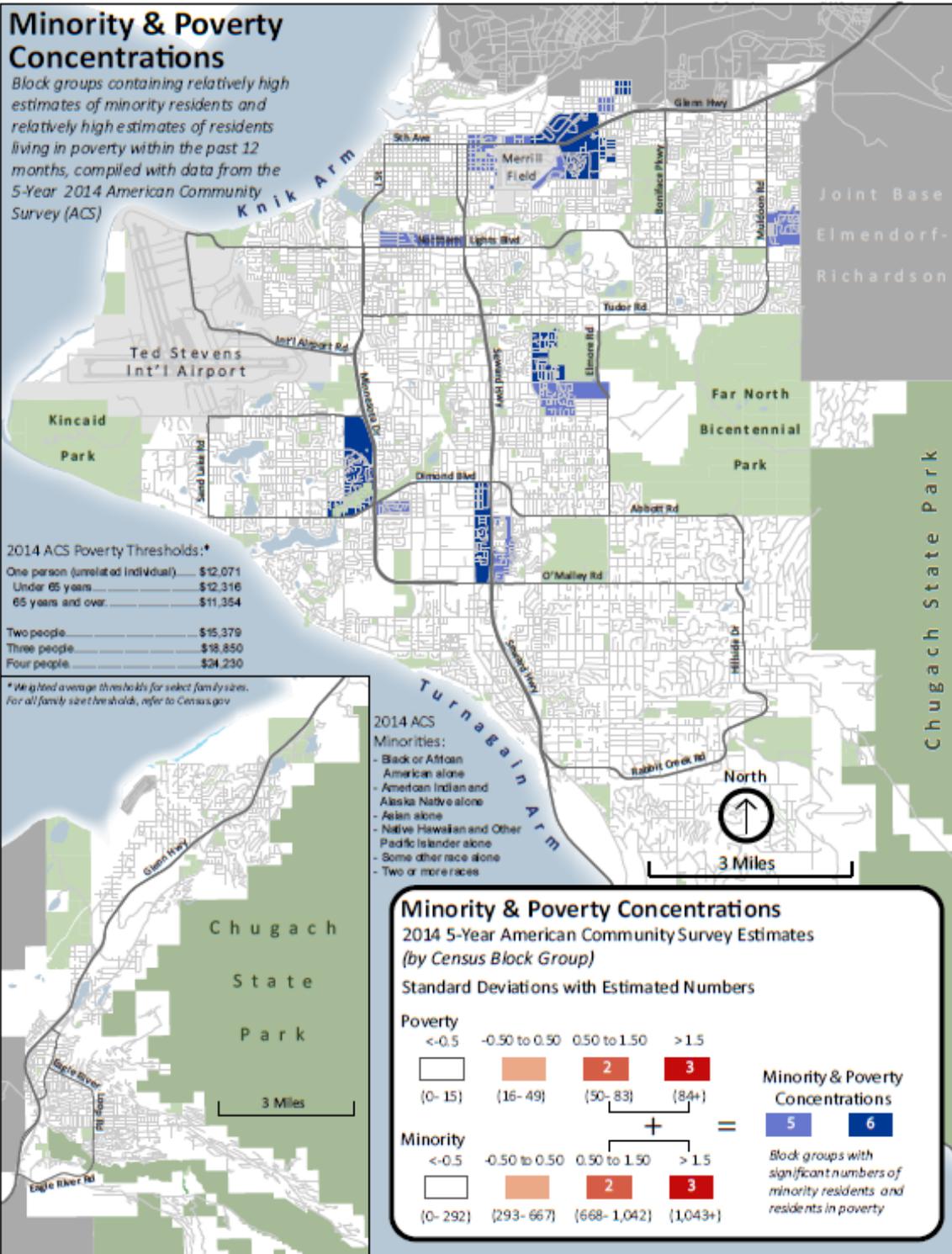
The Municipality’s Planning Department, Anchorage 2040 Land Use Plan website at <http://www.muni.org/Departments/OCPD/Planning/Projects/AnchLandUse/Pages/default.aspx>

The Municipality’s Department of Public Transportation, People Mover website at www.peoplesmover.org/transittalks to view the report titled “Anchorage Talks Transit, Choices, Outreach and Future Alternatives” by Jarrett Walker + Associates that includes maps and tables.

Appendix B – 2014 5 Year American Community Survey Maps

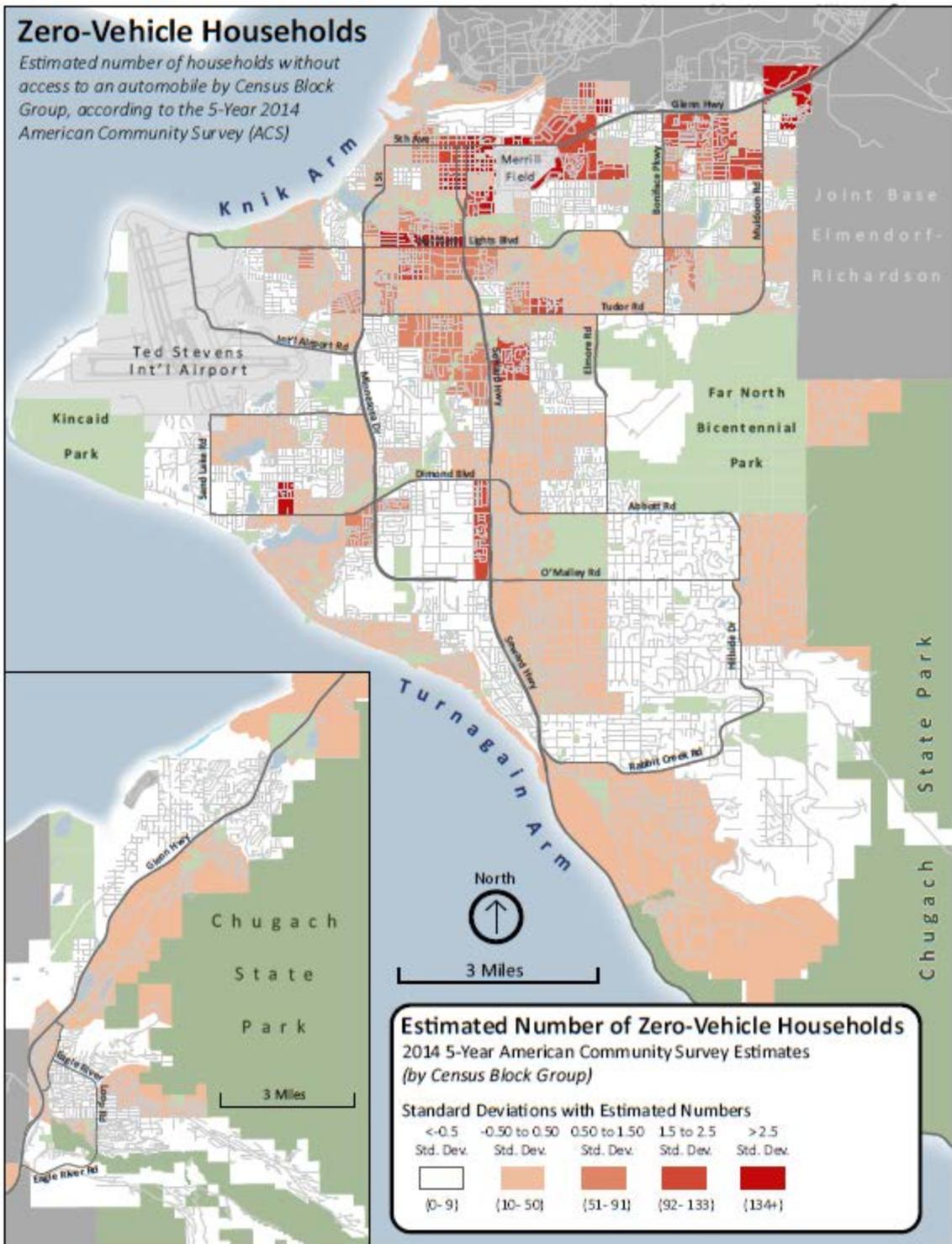






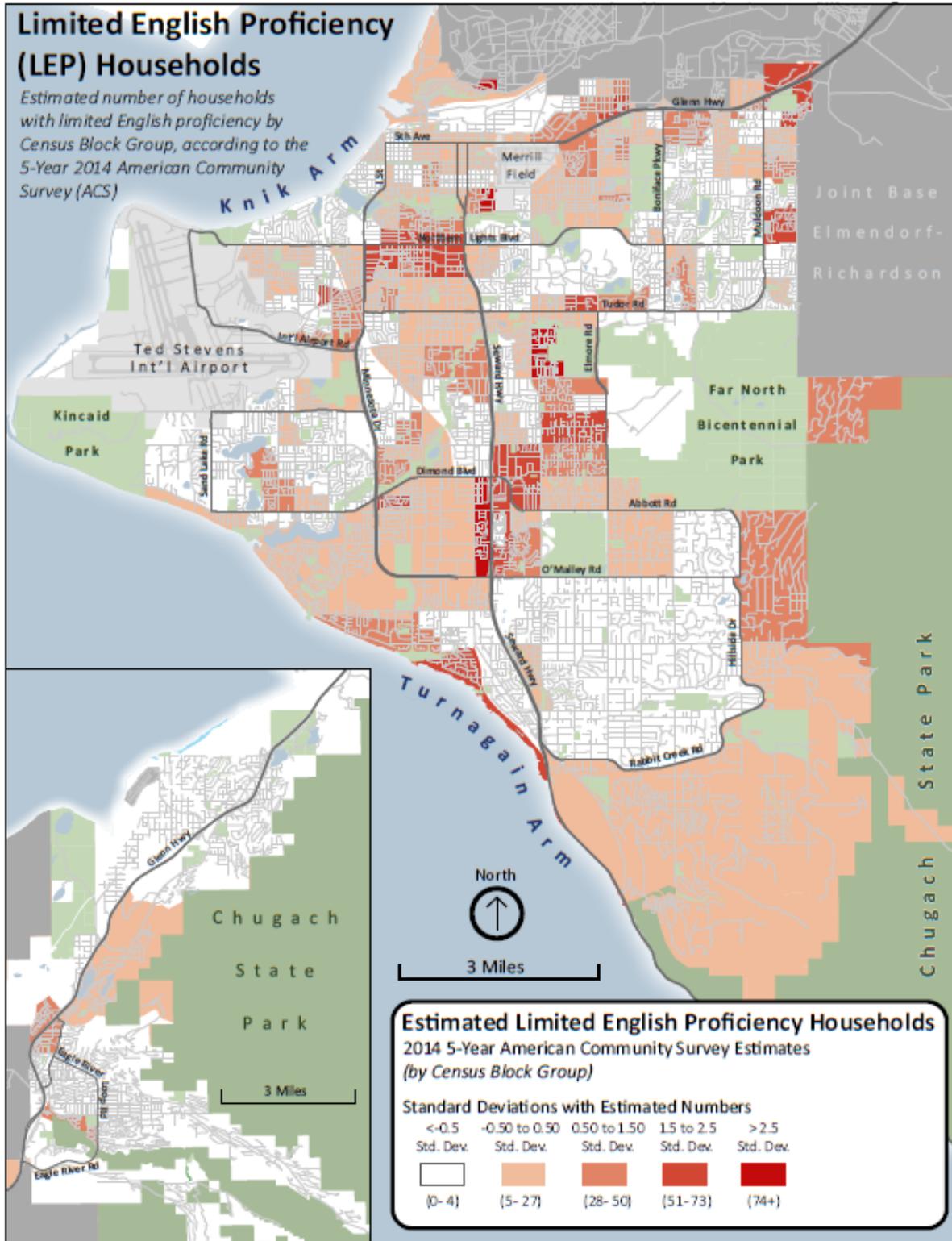
Zero-Vehicle Households

Estimated number of households without access to an automobile by Census Block Group, according to the 5-Year 2014 American Community Survey (ACS)



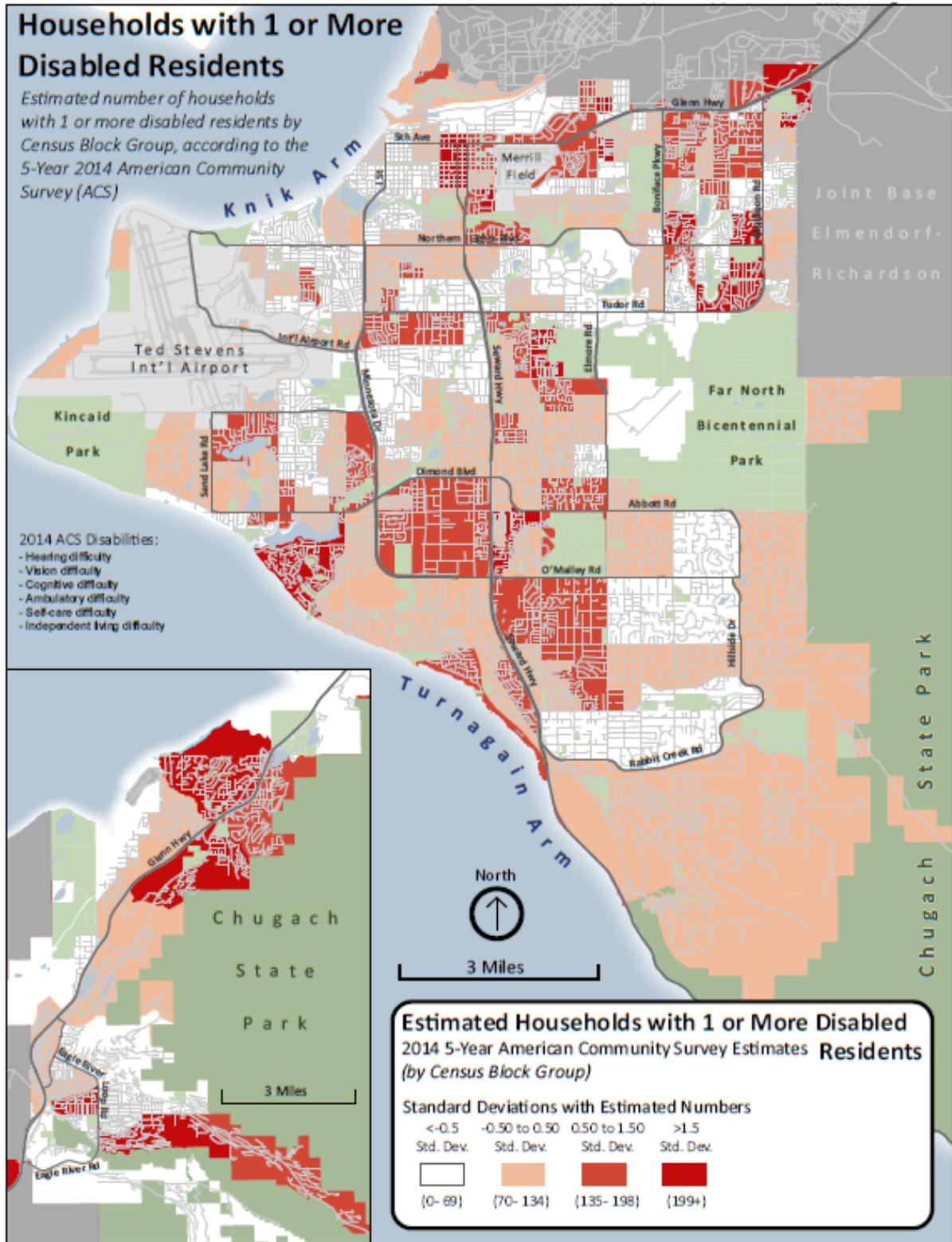
Limited English Proficiency (LEP) Households

Estimated number of households with limited English proficiency by Census Block Group, according to the 5-Year 2014 American Community Survey (ACS)



Households with 1 or More Disabled Residents

Estimated number of households with 1 or more disabled residents by Census Block Group, according to the 5-Year 2014 American Community Survey (ACS)



Appendix C – Public Comments

Public Hearing

May 25, 2016

Department of Health & Human Services
825 L Street, 4th Floor Conference Room 423

MOA Representatives	Guests
Nancy Anderson, Program Manager CSD James Boehm, Senior Neighborhood Planner Melinda Freemon, Director, DHHS	Maggie Humm, Alaska Legal Services Corp. Tom Edmiston, Alaska Legal Services Corp. Jeremy Baker, Alaska Legal Services Corp. Ron Fassett, Valley Residential Services Carel Nagata, Cook Inlet Housing Authority Alicia Cook, Habitat for Humanity Anchorage Corrine O’Neill, RurAL CAP

Presentation on Housing and Community Development Consolidated Plan 2018 – 2022

Presentation on Action Plan 2017

Presentation on Assessment of Fair Housing

Presentation on Housing Trust Fund

Mr. Boehm and Ms. Anderson gave a presentation on the five-year 2018 – 2022 Consolidated Plan, 2017 Action Plan, Assessment of Fair Housing Plan and the Housing Trust Funds.

Maggie Humm, Anchorage Legal Services Corporation - I am a supervising attorney at Alaska Legal Services Corporation (ALSC), I supervise our Anchorage office. As you know from listening to the presentation we provide free civil legal services to folks that are low income and we’ve been a recipient of CDBG Public Service funds for several years. We continue to be a recipient today and there are certainly folks who are homeless or at risk of homelessness that have a number of legal needs; and eviction defense is sort of an integral piece of the work that we do with these funds and other funding and so I wanted to share sort of the importance of this eviction defense work that we do and tell you a little bit more of what we do. Every day at ALSC we get calls, we have clients walk in who are being evicted in all parts of Anchorage from all types of housing. The reasons that they are evicted range from non-payment of rent, allegations of lease violations to the owner of the condo or whatever being foreclosed upon, any range of issues that we see on a daily basis. The people that we see do not have many resources and they are certainly very vulnerable populations; elderly, families with young children, folks with physical and mental disabilities and victims of domestic violence are another large group that we see. Without a lawyer, tenants often don’t know what they can do once they get that notice that they are being evicted, so they don’t know if the fact that they’ve gone without heat or hot water, or if they’re living in a roach infested apartment is any sort of defense. They often times don’t show up to court once they’re served with a summons, so they may just be defaulted and the landlord gets a writ of assistance. If they do go to court they may not know what legal arguments to make if they don’t have an attorney. After the tenant is evicted, the landlord then

may go to the damages phase of the case and pursue money damages for whatever it is they're alleging, unpaid rent, some damage to the apartment, those sorts of things; again the tenant often might not show up to this piece especially if they've already been evicted, and they don't have money to pay it. This can result in a money judgment against the defendant driving them deeper into debt and hurting their credit, making it really difficult to get a good reference from the landlord; you can see all these things on court view when you go to look up somebody. And those that have Section 8 Vouchers might lose their vouchers as a result of all this. If ALSC represents a tenant in this situation, a lot of this can be avoided. Using CDBG Public Service funds, we've represented a number of, hundreds of families; our success rate for work like this is about 97%. Our work is really efficient we've been doing this for a long time. Often time we can just negotiate with the landlord, we don't even have to go to court we can just call up the landlords and try to straighten things out. We also work closely with AHFC to help folks maintain their housing vouchers. If indeed they do need to part ways with the landlord, we can help them to maintain that voucher and take it with them to the next apartment or home they're in.

We try to be innovative without work; we don't just stop at representing clients. A few projects that we have done in the last few years, just this last year we implemented a Housing Court Justice project and that places a volunteer leader at the court house two days a week and represents tenants, offers representation to tenants where the landlord is represented. That is a project that has been successful so far.

In 2013 we started a landlord/tenant help line that's staffed by volunteer trainees two evenings a week and for years we've been teaching legal clinics in the community also staffed by volunteer attorneys. Again we try not to just focus on the day-to-day crises intervention; we try to have a broader impact by having these other projects. Our work we think is certainly evidence based, projects like the Housing Court Just project I mentioned, studies of those projects in other states have shown that when folks are offered a lawyer, tenants are more likely to stay housed and just overall they fare better financially.

Our works save the community money. In 2011 the Mental Health Trust funded an economic and social study of our services, ALSC's services specifically and they found that our eviction defense works saves Alaskan communities \$640,000 in emergency shelter costs annually.

I guess to sort of wrap up, continued theme for our eviction defense work we think is essential. You know, there is a serious justice gap in Alaska; most low income households do not have access to an attorney. There's approximately one civil legal aid attorney in Alaska for every 10,000 people at 200% or below the federal poverty guidelines, about every one person we assist we have to turn one away. We are the only provider of free legal services to folks facing eviction.

There were no questions.

Corrine O'Neill, Supportive Housing Division Director for RurAL CAP - Thank you for having me here today and taking public testimony on the Fair Housing, Action Plan and Consolidated Plan. On the fair housing assessment I would just like to comment HUD has some new guidance on criminal background and I think this is a really important topic in Anchorage

and I would like to see the municipality in their assessment do something around discrimination towards people with criminal backgrounds thereby discriminating by race because I think it's a problem across the community. In regards to CDBG funding, I'd like to see Public Service funding have a continual emphasis on homelessness in 2018 and thank the municipality for continuing the Public Service funding as it stands in 2017. It's really important for operational programs to have continuity in funding in order to sort of maximize good practice and operational standards I appreciate that those grants have run more than one year, because I think it almost takes you one year sometimes to even get up and running and then for the Housing Trust Fund I think RurAL CAP would like to see a maximization of the operational set aside and see if that can't be aligned with some housing choice vouchers.

The community just got back their Continuum of Care scores for this community which were not great and we lost three points in that round just for not having collaboration or set aside with our housing authority. Because the housing trust fund money is not very large and the operational set aside is not very large, I think coupling that would be good leverage for that funding and also because operational funding is so hard to come by.

I think the municipality knows HSMG just ran and there were over double the amount of applicants as there were funding, I think that would be a really important use. And then we would like to see the municipality keep their CHDO operating assistance program going, unfortunately compliance never pays for itself in programs like HOME programs even though it's a very, very small amount of funding. We think it really does help even just a little bit with capacity. **Ms. Anderson** stated it was \$9,000. **Ms. O'Neill** said that it still pays the rent. Also the Continuum of Care just lost its Rapid Re-Housing for AWAIC and with that the CoC is going to have difficulties scoring and being competitive and therefore, we cannot get any bonus projects around Rapid Re-Housing. I'd like to see an emphasis on ESG in regards to Rapid Re-Housing and maybe not this year but eventually looking at that for TBRA as well.

I think we run Safe Harbor Muldoon that has 330 people that were served in the last year; most children under the age of 5 and we're carrying an 11 person waiting list as are Clare House and McKinnel right now and we need to do something to get some people out of the system faster if we are going to really drop our family homelessness count in this community. And there's certainly people that could get out the system, it's just we have no continuum to get them out of the system that fast. So I'd like to see an emphasis more moving one ESG towards Rapid Re-Housing and looking at that eventually for TBRA. And then I'd think going back to my final comment on the Housing Trust Fund it's again targeted towards 30% of the median income. We know when we serve 30% of the median income, that you really shouldn't do that, that's often a very high needs population, if you're going to serve 30% of the median income, I think it should really be looked at for permanent supportive housing. Thank You.

Ms. Anderson asked if there were any questions for Ms. O'Neill. A member of the audience asked what the HSMG. Ms. O'Neill answered Human Services Matching Grant; it's an operational non-profit funding that's also administered by the municipality.

Ms. Anderson – I have just one question, you're talking about the 30% operational for the Housing Trust Fund, and you're saying use it towards tenant based rental assistance. **Ms. O'Neil**

– No, just that you maximize the set-aside because it's a choice. **Ms. Anderson** – So maximize it, you're saying with the housing choice vouchers? **Ms. O'Neill** – No, I'm saying take the maximum and then I'm saying see if you can and then if AHFC can somehow match that with Section 8 vouchers because it's not that much money, if you're going to do like a supportive housing project you're going to need the vouchers, just like Special Needs Housing Grant you need the operational and the vouchers, right to make the project work. Particularly since the CoC is also losing points on not having any connection to the housing authority on homeless projects right now. We certainly need every point that we can get.

Another guest question – How would we demonstrate that we made so much progress in the CoC with shifting RurAL CAP's Homeward Bound program from transitional housing to permanent housing in the John Thomas project, so that was a gain and that took an enormous amount of work and kudos to you and your whole team. But how would we demonstrate that because what I hear you saying is we need to operationalize, cooperation or partnership with the AHFC, so could you describe a little bit about what you had envisioned with that? **Ms. O'Neill** – No I didn't envision, I mean maybe it would help the CoC eventually if we could use the Housing Trust Funds because we are not able to be competitive enough to get anymore federal funds. Like we didn't get any of our bonus projects this year and we got our award cut because we are not reducing homelessness, we're not reducing the length of time of homelessness and so we're kind of in this place where we're not competitive enough to keep up our own funding resource. I just think the Housing Trust is not that much money so if we are going to do it, we're going to have to leverage. I think too, the loss of the Rapid Re-Housing piece is a problem coming up. The other place we scored really poorly was on diverting people fast enough out of the system. I think this has to do with Rapid Re-Housing, right? Because people are sitting in our system too long because we have no Rapid Re-Housing continuum to get them out, so we lost like six points or something like that on that category of not tracking who was staying in the system, getting them out of the system, reducing the length of days people are in the homeless system and so that was a big point loss.

Melinda Freemon, Director Department of Health and Human Services – We really appreciate this feedback, it's tremendously important whether you do it in writing or whether you do it here in this meeting or you connect with Nancy, it's very, very important. The decisions we make as a community, if you have suggestions on what Nancy and I spoke about earlier. When James was talking was taking a survey, it used to be many, many pages so when Jeremy, assistants, and Nancy and the team, it's been reduced now to four pages; which you can't imagine how much more user friendly that is than when I filled this out before. If we could get these to the community councils, either the federation or have the team go out to the community councils to find out if members and/or residents have experienced housing discrimination and the community's housing needs.

Ms. Anderson – We will be getting them out and we probably will be contacting some of your organizations, like Cook Inlet Housing Authority and do a short presentation and get feedback on both those surveys. Any other testimony, anybody else wants to talk?

Carel Nagata, Cook Inlet Housing Authority – The Land Use Plan Map is out for review right now. **Ms. Anderson** – Yes and they are doing the final public comment and review. **Carel**

Nagata, Cook Inlet Housing Authority – I just saw that on the 23rd they will maybe be at the Assembly, I guess presenting at the Assembly. My question is, has there been any discussion with the city about, they have some areas in their map proposing like reinvestment or transit supported corridors, things that will open somebody's housing development. Has there been any discussion with, I guess the Planning Department about their ideas, because I guess these are proposals? **Ms. Anderson** – As far as with our actually meeting with them and discussing with them, there haven't been any major discussions. They've come to the HAND Commission and did a presentation and talked about the plan and they've kept up with the e-mail notice, as I get the e-mail notice I just basically send it out to all our people on the list to make sure the people are available for making comments. What I've seen them doing, as far as with just me observing from my position, is that I think that they're getting some good comments and they're making some good decisions as far as making it more builder friendly and more affordable, and that's pretty much our overlap.

Carel Nagata, Cook Inlet Housing Authority – I guess is there any contemplation about getting some of the federal funds to kind of line up with those targeted areas they're looking at. Like if the city is committed to invest in certain areas whether it's the public infrastructure like tax abatement, like getting some of the HUD money. **Ms. Anderson** – For us targeting certain areas we can target neighborhoods that are more low income, we do have that population in Mt. View. If we look at the census map and we look at where the lower income populations live, the census map will look at blocks of communities or as the Municipality of Anchorage, we can target blocks of communities like Mt. View area. Otherwise, for us to be able to put any money in a project like that it would have to be serving the low income population. Any housing project we would have to have a percentage of those people moving into that housing project meet the low income qualifications.

Ms. Anderson asked for anymore comments.

Jeremy Baker, Director Fair Housing Enforcement Project, Alaska Legal Services Corporation – I want to thank the municipality for the opportunity to testify today and also for asking for our input and collaboration as you work on the Assessment of Fair Housing process. I'm just going to highlight a couple of areas to Fair Housing choice that we've heard about from community members. Today I'll probably be giving additional input throughout the process, but today I just want to mention a couple of things. The first was already brought up by Corrine, and that is overly broad criminal backgrounds screening policies. As soon as an area of emphasis for HUD, at the moment it's also kind of dovetails with all the work that is being done around prisoner re-entry in Alaska and nationally. A number of housing providers both subsidized housing providers and private landlords do have overly broad policies that are limiting access to housing and are kind of continuing to punish re-entering citizens who have already paid their debt to society. There are ways to address this by having policies that look at, take an individualized assessment of the crime that was committed, when it was committed and other mitigating factors that might be present so that you can ensure the safety of housing provider staff and residents while providing better access to housing for our re-entering citizens.

The second barrier to fair housing choice that I want to mention today was private landlords that are not taking vouchers, housing choice vouchers or Section 8 vouchers as they are sometimes called. In the fair housing rule we call this a source of income discrimination. It is something

that has been prohibited in a number of states and municipalities around the country and it's an especially big issue in Anchorage today with the type of rental market that we have, the source of income discrimination is closing off a significant portion of the rental market to folks that have housing vouchers. And it also might be limiting access to areas of opportunity in town if landlords in certain neighborhoods tend to not take vouchers; so we hope that that source of income discrimination is something that the municipality will take a look at in the AFH process. Thanks.

Ms. Anderson asked if there were any questions for Jeremy. There were none.

Ms. Anderson asked if there were any other comments. **Ms. Anderson** informed everybody if they had comments later they can send it in an e-mail, fax or mail it in to her through June 13th. There will be other comment periods. We are looking at December 2016 for the 2017 Action Plan. Our 5-year plan that starts in 2018. The Assessment to Fair Housing, our plan to HUD has to be there by early April. The surveys, we will be doing presentation all through the fall and will be completed by December.

Public Hearing
February 1, 2017
City Hall
632 West 6th Avenue, Conference Room 155

Municipality DHHS Representative	Guests
Nancy Anderson, Program Manager CSD	Jeremy Baker, Alaska Legal Services James Croft, Alaska Legal Services Stephanie Smithson, Catholic Social Services Eddie P., Aviator Hotel

Presentation on Municipality’s Assessment of Fair Housing (AFH) Plan:
Ms. Anderson gave a PowerPoint presentation on a summary of the Assessment of Fair Housing Plan.

Jeremy Baker, Alaska Legal Services Corporation (ALSC) – Thank you for this opportunity to comment on the Municipality’s Draft Assessment of Fair Housing. First, I want to acknowledge the work that went into the preparation of the Municipality’s Draft AFH, particularly by the staff of the Department of Health and Human Services.

HUD’s Affirmatively Furthering Fair Housing, or AFFH, final rule was published in July 2015, less than 2 years ago, so I appreciate that there were challenges in putting this regulation into practice while trying to apply a relatively new and evolving set of requirements.

The Municipality’s work on this AFH is contributing to raising awareness about, and helping to continue discussions around, issues relating to housing discrimination and equality in housing rights, and I look forward to continued collaboration as we work together in identifying and addressing fair housing issues, and barriers to access to opportunity, in our community. Alaska Legal Services Corporation will be submitting detailed written comments on the Draft Assessment of Fair Housing, so I will keep my comments today relatively brief.

At least 6 times in the Draft AFH, some variation on the following statement is repeated when prompted to discuss housing issues in terms of racial or ethnic groups.

“Anchorage doesn’t have race/ethnic segregated housing patterns. Anchorage does have income segregated housing patterns.”

This statement is problematic on a number of levels. First, Anchorage has a racially or ethnically concentrated area of poverty, as defined by the federal government. Therefore, it is not consistent with the HUD-provided information to say that we don’t have any racially or ethnically segregated housing patterns. Furthermore, when you look at the low-income population in Anchorage, for example individuals at 125% of the poverty level or less, the majority are people of color. So, in reality, income-segregated housing patterns are racially segregated housing patterns. And the AFH must acknowledge and address this.

I think revisiting the definition and explanation of what AFFH means can provide helpful context:

AFFH is defined by federal regulation to mean "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."

This Draft AFFH seems to simply state that we do not have race-related housing issues in Anchorage, even in the face of data to the contrary.

Furthermore, looking at ways to increase access to areas of opportunity and improve fair housing choice for all residents is at the heart of the AFFH rule, but there is far too little of this discussion in the Draft AFH.

For example, Source of Income discrimination, or in other words refusal to rent to someone with a housing voucher, is identified as a potential barrier to fair housing choice in the Draft AFH. However, a discussion of how this might be addressed is lacking, despite HUD providing specific examples of how a local government might deal with SOI discrimination and how this can increase fair housing choice and provide access to areas of opportunity in the community.

With regards to public participation, the AFFH final rule says that "communication means designed to reach the broadest audience." To the best of my knowledge, the only public notices regarding the Assessment process were published in the notices section of the Alaska Dispatch News in English.

Information on the Assessment of Fair Housing process was not even readily available on the Muni's website. There was apparently little to no targeted outreach to groups with Limited English Proficiency.

While the Muni did visit a number of organizations to distribute a survey on Housing Discrimination, this survey only asked about past experiences of discrimination. It did not address many of the crucial aspects of the AFFH requirement, including disproportionate housing needs and access to community assets and areas of opportunity. Outside of the written public comment process, which suffered from the notice issues I just mentioned, there was no mechanism for public input on these foundational components of AFFH. And it appears that not all verbal comments made at these events were included and addressed in the Draft AFH as required. This represents a missed opportunity to solicit input from those most affected by fair housing issues and housing policy.

In addition, the content of the Draft AFH is not consistent with HUD's requirements. HUD has released an "AFH Tool" which grantees are to use in completing their Assessments. This tool contains specific prompts that must be addressed, generally by analyzing HUD-provided data

based on various protected classes. The Draft AFH contains some, but it appears not all, of the HUD-required content. In addition to omissions, the responses to many of the prompts did not address the question asked or did not contain the required analysis. For example, on p 47, in the section addressing disability issues in housing, the prompt says:

“Do the Jurisdiction and Region have sufficient affordable, accessible housing in a range of unit sizes? Include a discussion of affordable units with accessibility features for individuals who use wheelchairs, individuals who are deaf or hard of hearing, and individuals who are blind or have low vision.”

In response, a table is provided listing the numbers of people with certain types of disabilities but no information on housing. The response continues, saying

“One of the common complaints expressed by residents with disabilities is the insufficient number of affordable and accessible housing ranging in unit sizes in Anchorage and the Mat-Su Borough. The largest percentage of residents with a disability in Anchorage are in need of accessible housing for ambulatory difficulty (5.38%). There is a demand for housing built on one-level or access to an elevator plus other ambulatory modifications.”

So, in the response there is no data on the housing stock suited to people with various disabilities, and nothing related to the required discussion of vision and hearing impairments. I will give one more example. We have one racially or ethnically concentrated area of poverty under the federal definition – the Mtv. View/Govt Hill area. On p. 13, a prompt says, “for each identified R/E CAP, describe the relevant characteristics that set it apart from non-R/E CAPs, including patterns of financial investment, transportation and other basic services, infrastructure, health and safety condition, and geographic isolation.”

The response Draft AFH is “There are no relevant characteristics that set Mountain View and Government Hill” apart from other neighborhoods in Anchorage.

I think it is fair to say that these are representative of the responses and analysis in the Draft AFH. Again, this is not compliant with HUD’s requirements. In addition, it represents a missed opportunity to gather and analyze data, for use by the Municipality and housing providers in planning, and for use by advocates in identifying and addressing areas of need.

The final area I want to address has to do with the goals and action plans set out in the Draft AFH. The applicable regulation, at 24 CFR 5.154, states that for each goal,

“a program participant must identify one or more contributing factors that the goal is designed to address, describe how the goal relates to overcoming the identified contributing factor(s) and related fair housing issue(s), and identify the metrics and milestones for determining what fair housing results will be achieved.”

The goals in the Muni’s Draft AFH do not meet this requirement. There is no clear discussion of how the goals relate to contributing factors, and the goals generally do not include meaningful metrics for determining results.

For example, there is no goal specifically relating to increasing the stock of accessible housing, even though as noted a moment ago, that was described as an area of need. Looking at the goals that are included, one of them is: “Expand and market housing assistance programs for the protected classes of the residents.”

The measureable action items associated with this goal are:

- First, for MOA and AHFC to “collaborate” in developing and marketing “an accessible housing registry for residents on housing assistance programs” and
- (2) for the MOA to “support and assist” the State on Medicare expansion to cover some of these programs.

I agree the expansion of housing assistance programs is an urgent issue, but this goal and the associated measurable, like most in this Draft AFH, are much too vague. Indeed, there are no metrics and milestones for determining results. Goals should be set with specific deliverables and timeframes so that results can be measured, as required.

In closing, I’d like to note that HUD issued a revised AFH tool for local governments on January 13, 2017. That is the version of the tool that is currently in effect and that HUD says must be used for completing the AFH. I encourage the municipality to consult this resource in revising the Draft AFH.

Thank you again for the opportunity to comment today.

Municipality of Anchorage, Department of Health & Human Services (DHHS) Response

#1. The draft AFH plan includes HUD Table 3 – Race/ethnic Dissimilarity Trends on page 12. The dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicated a higher degree of segregation among the two groups measured. The dissimilarity index for Anchorage has a low segregation level (0-39) for all four race/ethnic populations. The 10 year trend for Anchorage has an increase for the four race/ethnic dissimilarity indexes but still a low segregation value.

Anchorage race/ethnic trends over the last 15 years shows the White population declining and all other race populations growing with the greatest growth in the Asian or Pacific Islander and Hispanic origin populations. Anchorage ranks 30th among 366 metropolitan areas in the diversity index and is fifth among medium-sized U.S. cities (page 10 of draft AFH plan).

Anchorage’s neighborhoods are unique because they include members of all seven demographic categories/groups recognized by the government, White, Black, Hispanic/Latino, Alaska Native/American Indian, mixed race, Asian and Native Hawaiian/Pacific Islander in large numbers. The diversity index is defined as the race/ethnic groups in a Jurisdiction or Region. The more equally sized they are then the more demographic diversity you have in an area.

There are no neighborhoods in Anchorage that have mostly non-White residents. Even the HUD Table 4 R/ECAP Demographics identified the R/ECAP neighborhood of Mountain View as

having 24% of the residents identified as White. Therefore, the AHF plan concluded that, Anchorage doesn't have race/ethnic segregated housing patterns. Anchorage does have income segregated housing patterns.

DHHS Response #2. The draft AFH plan includes one of the four goals to address landlords refusing to rent to a person with a housing voucher. On page 60 of the draft AFH plan is the goal as stated, **D1 Goal:** Partner with other agencies to provide public education about the provisions of the Fair Housing Act and Municipal law to housing professionals, landlords, renters and homebuyers about protected classes. **D1 Activity Measure:** MOA will plan and participate in Fair Housing Month every April with ALSC, AHFC and HUD during the 5 years of the AFH Plan. **D1 Activity Measure:** MOA will promote fair housing topics on the front page of the MOA website during the 5 years of the AFH Plan.

DHHS Response #3. The Municipality followed the Citizen Participation Plan that was amended to include the AHF plan and submitted and approved by HUD on April 18, 2016. This was required by HUD before the Municipality could start working on the AHF plan. The amended Citizen Participation Plan will be included in the Municipality's Housing and Community Development Consolidated Plan for 2018-2022.

The AFH plan was posted as a Public Notice for a 30 day public comment period in the Alaska Dispatch, posted on the Municipality's DHHS website and later on the Municipality's front page website, emailed to the citizen participation list maintained by DHHS and the Anchorage Coalition to End Homelessness (ACEH) membership list, emailed to partner agencies that participated in drafting the AHFC plan, and paper copies were made available at the Loussac Library, ACEH office and Public Housing's Anchorage Family Investment Center. The participation of all residents was encouraged and reasonable accommodation was offered for those residents with disabilities who need auxiliary aids, services, or special modifications and non-speaking English residents.

As stated on page 53 of the draft AFH plan, the Municipality departments have access to a system called Language Link, which has dozens of translators on hand. The individual points to their language on the poster of the department that they are in, the Municipal employee calls the 1-800 number and the number connects them to a translator. The translator then speaks via speaker phone to the individual.

As stated in the draft AFH plan on page 5, MOA communicated with organizations serving various race/ethnic groups to insure adequate involvement within Anchorage. MOA disseminated fair housing materials and the fair housing survey to nonprofit organizations serving the Anchorage's culturally diverse population. MOA staff would provide both a written and oral Fair Housing Survey for persons with disabilities and/or limited English proficiency. MOA offered language interpreters to clients with limited English proficiency at the DHHS Public Health Services (PHS) and Women Infants & Children (WIC) offices that included the Native Health Services campus where the survey was distributed. As an incentive for completing the survey at the PHS and WIC offices, two \$50 grocery store gift cards were awarded to the winners of drawings held for each office.

DHHS Response #4. The AFH survey was drafted by the Municipality and vetted by Jeremy Baker, the Director of the Fair Housing Project at Alaska Legal Services Corporation, before the survey was finalized. MOA developed a short four question fair housing survey that took less than 5 minutes to complete. As stated in the draft AFH plan on page 5, the survey was used as a tool to encourage the public to participate in the AFH plan discussion and talk about their fair housing concerns to the Municipality staff at the meetings and events. Whenever possible, the Municipality staff partnered with Jeremy Baker, Fair Housing Enforcement Project Director at Alaska Legal Services Corporation, when invited to give a presentation on AFFH process in developing the AFH plan for the Municipality and distribute the fair housing survey.

The Municipality will include transcripts of public comments received during the two 30-day public comment periods, May 25, 2016 and February 1, 2017, in the final AFH plan. The AFH survey results are summarized on page 8 of the AFH plan, as well as the two HUD work sessions held on August 9, 2016 and September 20, 2016.

DHHS Response #5. There is no HUD or local data on specific housing stock available for residents with disabilities in Anchorage. The Municipality will make this statement clearer in the AHF plan. HUD tables 13 Disability Type, 14 Disability by Age Group and 15 Disability by Public Supported Housing Program Category, were reference in the draft AFH plan on pages 47 and 48. The Municipality referred to the data in the HUD tables when responding to the questions.

The Municipality researched local data to respond to the questions and contacted the Governor's Council on Disabilities & Special Education. The director of the Governor's Council provided the Municipality with the Housing Barriers Report 2015 from the Governor's Council on Disabilities & Special Education. The report provided the Municipality with local information about residents with disabilities fair housing concerns and issues that were included in the AFH plan. The director of the Governor's Council reviewed and vetted the AFH plan's IV. Analysis Section E: Disability and Access before the draft AFH plan was posted for public comments. There is no HUD or local data on specific housing stock available for residents with disabilities in Anchorage.

DHHS Response #6. HUD calculates R/ECAP area based on the 2010 census data. R/ECAP is a Census Tract where at least 50% of the population is non-White and/or Hispanic and has an income threshold that looks at the poverty rate. The poverty rate on that Census Tract has to be either 40% or more or three times the rate of the poverty rate for that Municipality as a whole.

The HUD analysis of Anchorage has identified one (1) Racially or Ethnically Concentrated Area of Poverty (R/ECAP), the Mountain View and Government Hill neighborhoods. Other than the R/ECAP designation, the neighborhoods of Mountain View and Government Hill have no relevant characteristics that set these neighborhoods apart from some other neighborhoods in Anchorage. Throughout the AFH plan, data supports that both neighborhoods have access to financial investment, public transportation, schools, jobs and other basic services. Mountain View neighborhood has had improvement in infrastructure such as schools, affordable housing, and health and safety conditions. Neither neighborhood is geographic isolated.

DHHS Response #7. The Municipality's AHF plan goals and activities were written with the intent for the Municipality to be able to implement the activities in the 5 years of the AHF plan. As stated on page 3 of the draft AFH plan, the HUD Affirmative Furthering Fair Housing (AFFH): Final Rule dated July 16, 2015, 24 CFR Part 5, 91, 92, requires the MOA to submit an Assessment of Fair Housing (AFH) plan to HUD by April 6, 2017. The AFH plan must be approved by HUD in order for the MOA to receive the approximately \$2.3 million in annual grant funds for low-income housing and development in the Municipality of Anchorage that includes the communities of Anchorage, Eagle River, Chugiak, Peters Creek, Eklutna and Girdwood (Turnagain Arm). The \$2.3 million that the Municipality that is awarded by HUD limits the Municipality's ability to implement fair housing and development goals without partnering with other agencies with financial resources.

DHHS Response #8. On January 13, 2017 (Friday) HUD announced the availability of the updated Assessment Tool for local governments that receive HUD formula funding to conduct and submit an AFH. A comparison of the Revised Assessment Tool to the Final Assessment Tool for which the notice was published in the Federal Register on December 31, 2015 was also provided so that local governments could review all changes made.

The Municipality had one day to review the HUD notice on January 17, 2017 (Tuesday) since Monday, January 16, 2017, was the Martin King Jr. holiday. The Municipality noted that there were no significant changes to the HUD Assessment Tool so went forward as scheduled with the 30-day public comment period for the draft AFH plan on January 18, 2017 (Wednesday). The Municipality will incorporate all modifications to the AFH plan in the final AFH plan.



Municipality of Anchorage

Planning Department
Long-Range Planning Division

Memorandum



Date: February 15, 2017

To: Nancy Anderson, Community Safety and Development Manager,
Department of Health & Human Services

Thru: *W* Carol Wong, Long-Range Planning Manager

From: *CC* Jon Cecil, AICP, Senior Planner
JS Jody Seitz, Associate Planner
Planning Department

Subject: Draft Assessment of Fair Housing Plan for the HUD Housing and Community Consolidated Plan 2018-2022, dated January 18, 2017

Thank you for providing the Planning Department's Long-Range Planning Section, as well as other agency and community stakeholders, with an opportunity to review and comment on the *Draft Assessment of Fair Housing Plan for the HUD Housing and Community Consolidated Plan 2018-2022 ("Plan")*. This Plan serves several important purposes because it addresses the Municipality's eligibility for funding from the federal government, partners with citywide organizations to further affordable housing opportunities for low and moderate-income families, and engages neighborhoods in long-term community development planning. Future community and economic development in Anchorage rests upon the implementation of federal, state and local policies, goals and objectives.

The *Anchorage 2020 – Anchorage Bowl Comprehensive Plan* is the overarching public policy document for the Municipality and we encourage the Department of Health and Human Services (DHHS) to acknowledge the policies that relate to housing issues whenever possible. Please bear in mind that the Municipality has also adopted 12 neighborhood and district plans that also address housing issues within their respective neighborhoods. The Municipality is updating its land use plan map for the Anchorage Bowl which is 34 years old. All of these planning documents form the basis for land use planning, zoning, and development practices in Anchorage.

The Draft Plan as prepared by DHHS provides an opportunity for the Municipality to document and analyze Federal Fair Housing goals and objectives as well as potential patterns of discrimination and the promotion of fair housing choice in Anchorage. The Plan can tell the U.S. Department of Housing and Urban Development (HUD) a relevant and important story about Anchorage's current and future actions to combat discriminatory practices, overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity-based on protected characteristics.

The MOA Planning Department's Long-Range Planning Section reviewed the Draft Plan and we conclude that it does not clearly or accurately convey the story about the state of fair housing in

Anchorage. Unfortunately, we found the Plan to be difficult to read and in need of editing and proofreading. As planners we understand how difficult and time consuming writing community plans can be so we offer the following high-level suggestions in an attempt to improve how to tell the Fair Housing Story in Anchorage. Again, we appreciate how much work and effort goes into a plan of this scope and we offer our comments in the spirit of constructive criticism. Thank you for your attention to this matter.

If you require clarification on any of our comments please don't hesitate to contact Carol Wong, Planning Manager, Long-Range Planning Section, 343-7920, or email: wongcc@muni.org.

Assessment of Housing Plan Comments

The Planning Department acknowledges the importance of fair housing to the municipality and the larger metropolitan region. The *Fair Housing Plan for the HUD Housing and Community Development Consolidated Plan 2018-2022* should reflect how important fair housing choice is for many of our residents who may not have the means to obtain affordable housing. Anchorage is one of the most expensive housing markets in the United States. A lot of research about the state of housing in this community has been documented over the past few years. It would be appropriate to acknowledge the *Anchorage 2020 – Anchorage Bowl Comprehensive Plan*, the pending *Anchorage 2040 Land Use Plan* map, and the 12 neighborhood or district plans when discussing fair housing in Anchorage. In March 2012 the Municipality completed a housing study that highlighted the need for more housing of all types in the Anchorage Bowl, but especially for more rental, multifamily units. As noted, each of these plans has something important to say about how many, where, and what type of residential structures should be located within the municipality.

A glossary of acronyms included in the front of the Plan might be helpful to the layperson who may be unfamiliar with federal housing terminology and abbreviations. The housing profession—like the planning profession—has its own terminology and jargon that can be challenging to decipher by the general or non-technical reader. This report has a wonderful opportunity to make the case about fair housing choice and why it is so critical to the housing environment in Anchorage. This report will likely reach a wide audience, some of whom may not be as familiar with the housing terms and concepts found in the report. Anything that DHHS can do to improve report readability with a lay audience is encouraged.

Planning staff identified some technical edits that are needed within the Plan; however, we defer to the report author(s) to identify where and how the report could be amended. We encourage the author(s) to be more explicit in terms of the technical analysis and the implications of this analysis. We are not confident that the report adequately or concisely conveys the state of fair housing in Anchorage. We found the fair housing story to be vague, confusing, and difficult to follow. At a minimum a grammar and spell check of the report should be made prior to submittal to HUD.

Overall, the text appears to lack internal consistency, particularly between the text and tables and maps. Each map and/or table should be referenced within the body of the text and they should more clearly describe the status of fair housing in Anchorage.

The Long-Range Planning section encourages DHHS to record the number of individuals who attend public meetings about fair housing.

In terms of identifying certain demographic trends from the various tables it would be helpful to clarify that Anchorage's minority population is growing as a percentage of the whole population. This distinction is either missing or not clear to the reader. As you know the overall immigrant population of 27,000 would place Anchorage 119th on a national basis. Or, Anchorage is the 119th most diverse municipality in the nation, with a current population of about 27,000 immigrants.

Putting dates in chronological order is helpful in order not to confuse the reader.

Part IV of the Analysis Section of the Plan (starting on page 45) is unclear and could benefit from being rewritten. Again, help to explain the story behind each of the maps would benefit the reader to more clearly understand this technical information.

We found discussion about density and diversity to be somewhat confusing. The maps appear to reflect that minority populations are spread out across the Anchorage Bowl which illustrates more about distribution than it does about diversity. As we understand it diversity speaks more to the percentage of a minority group of the population.

The map illustrating "the dissimilarity index" found on Page 11 of the Plan appears to show a high degree of residential segregation. However, the paragraph following the map doesn't explain why this map is used, even though the text states that "because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups." It is unclear what conclusions the reader can draw from this map.

The document states that Anchorage doesn't have racial or ethnic segregated housing patterns. Anchorage does have income segregated housing patterns. On their face these statements may be factual but they are used in the text without any supporting documentation or references. We question whether or not these statements contradict the "Dissimilarity Index."

The text of the draft Plan doesn't indicate which minority groups have experienced the highest levels of segregation in the Anchorage Bowl and the larger metro area which includes the Northern Communities (i.e., Chugiak-Eagle River, Birchwood, Eklutna, and Peters Creek) as well as the Matanuska-Susitna Borough (MSB). The report should attempt to make an informed observation or arrive at some kind of conclusion as to why this may be the case.

In summary, the Planning Department's Long-Range Planning section suggests that additional clarification, strong editing, and correcting grammatical errors will make a stronger statement about fair housing in Anchorage. This report will reflect well on Anchorage as a community with incredible ethnic and economic diversity. Anchorage is a community that seeks to make progress to overcome discriminatory practices, removing barriers to accessibility to housing, and overcoming patterns of segregation by fostering a more inclusive community. As presently written we don't believe the Plan makes this case as clearly or as well as it could.

Again, thank you for providing us with the opportunity to review and comment.

**Assessment of Fair Housing (AFH) Plan
Public Comment Received on
February 21, 2017**

Municipality DHHS Representative	Comments
Nancy Anderson, Program Manager CSD	Jeremy Baker, Alaska Legal Services Corporation

Alaska Legal Services Corporation (ALSC) – These comments, submitted by the Fair Housing Project of Alaska Legal Services Corporation (ALSC), address the Municipality of Anchorage’s Draft Assessment of Fair Housing Plan (Draft AFH). The Fair Housing Project of ALSC is the state’s only full-service fair housing program and works to eliminate housing discrimination and to ensure equal housing opportunity for all people in Alaska. These comments are informed by our work as legal aid practitioners and fair housing advocates.

The federal Fair Housing Act requires the United States Department of Housing and Urban Development (HUD) to “administer [its] programs and activities relating to housing and urban development in a manner affirmatively to further the policies of [the Fair Housing Act].” 42 U.S.C. § 3608(e)(5). A similar provision, 42 U.S.C. § 3608(d), applies to all federal agencies with housing and community development programs. To effectively implement this long-standing statutory requirement, HUD promulgated an Affirmatively Furthering Fair Housing (AFFH) Final Rule in 2015.

HUD's AFFH Final Rule provides an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. As provided in the rule, AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development.

Pursuant to the AFFH Final Rule, the Municipality is required to prepare an Assessment of Fair Housing (AFH), which is intended to help communities comply with their obligations under the Fair Housing Act. HUD has provided an “AFH Tool” that, along with instructions and data, consists of a series of questions designed to help grantees identify fair housing issues in their communities. The AFFH Final Rule requires that the AFH be incorporated into the Consolidated Plan and other planning documents.

We appreciate the Municipality’s efforts in preparing this Draft AFH. To meet the requirements of the AFFH Final Rule and to fulfill its obligations to affirmatively further fair housing, however, we believe that the Municipality must revise the draft AFH to include necessary

information and data, analysis of fair housing issues, identification of contributing factors, and meaningful and measureable goals. These requirements are not merely an empty process. Rather, the AFFH rule encourages a more engaged and data-driven approach to assessing fair housing and planning actions, and establishes basic parameters to help guide public sector housing and community development planning and investment decisions. The Assessment of Fair Housing should be an effective planning document that lays out the path the Municipality will follow to increase equitable access to opportunity and to ensure that Anchorage continues to be a diverse and inclusive city.

We have identified four general categories of deficiencies in the Draft AFH.

ALSC Comment #1. First, there were serious issues with the Municipality's Community Participation process. The methods used by the Municipality did not reach a large audience nor did they effectively solicit input from the traditionally marginalized and underserved groups that are most likely to be directly impacted by the Municipality's fair housing policies. They also did not result in effective input regarding reducing barriers to fair housing choice and increasing access to areas of opportunity. This not only fails to meet HUD's requirements, it represents a missed opportunity. The community participation process offers a tremendous chance for the Municipality to gather important information and perspectives on the most pressing fair housing needs in the community and promising strategies for addressing them. It also offers community stakeholders a voice on important housing and community development issues and priorities. We recommend that the Municipality consider continuing to solicit input from community members and groups, as well as other relevant local and state government agencies, as it works to complete the AFH.

DHHS Response #1. The Municipality complied with the Citizen Participation Plan that was amended to include the AHF plan, as required and approved by HUD, before the Municipality could start working on the AFH plan. The amended Citizen Participation Plan will be included in the Municipality's Housing and Community Development Consolidated Plan for 2018-2022.

The AFH plan was posted as a Public Notice for a 30 day public comment period in the Alaska Dispatch, posted on the Municipality's DHHS website and later on the Municipality's front page website, emailed to the citizen participation list maintained by DHHS and the Anchorage Coalition to End Homelessness (ACEH) membership list, emailed to partner agencies that participated in drafting the AHFC plan, and paper copies were made available at the Loussac Library, ACEH office and Public Housing's Anchorage Family Investment Center. The participation of all residents was encouraged and reasonable accommodation was offered for those residents with disabilities who need auxiliary aids, services, or special modifications and non-speaking English residents.

As stated on page 53 of the draft AFH plan, the Municipality departments have access to a system called Language Link, which has dozens of translators on hand. An individual points to their language on the poster and a Municipal employee calls the 1-800 number to connect them to a translator. The translator then speaks via speaker phone to the individual and the Municipal employee.

As stated in the draft AFH plan on page 5, MOA communicated with organizations serving various racial/ethnic groups to insure adequate involvement within Anchorage. MOA disseminated fair housing materials and the Fair Housing Survey to nonprofit organizations serving the Anchorage's culturally diverse population. MOA staff would provide both a written and oral Fair Housing Survey for persons with disabilities and/or limited English proficiency. MOA offered language interpreters to clients with limited English proficiency at the DHHS Public Health Services (PHS) and Women Infants & Children (WIC) offices, including the WIC office at the Native Health Services campus, where the survey was distributed. As an incentive for completing the survey at the PHS and WIC offices, two \$50 grocery store gift cards were awarded to the winners of drawings held for each office.

ALSC Comment #2. Second, throughout the Draft AFH, the Municipality fails to ask or address numerous required questions/prompts posed by HUD's AFH Tool. When the Municipality does ask the questions posed by the AFH Tool, the Draft AFH sometimes rewords the questions in ways that make a substantive difference. By failing to ask the right questions, the Draft AFH sets itself up to provide insufficient data and analysis. We recommend that the Municipality consider revising the Draft AFH so that it follows the format set out in the AFH Tool, including all required questions/prompts.

DHHS Response #2. On January 13, 2017 (Friday) HUD announced the availability of the updated Assessment Tool for local governments that receive HUD formula funding to conduct and submit an AFH plan. The Municipality had one day to review the HUD notice on January 17, 2017 (Tuesday) since Monday, January 16, 2017, was the Martin King Jr. holiday. The Municipality noted that there were no significant changes to the HUD Assessment Tool so went forward as scheduled with the 30-day public comment period for the draft AFH plan on January 18, 2017 (Wednesday). The Municipality will incorporate all required information in the final AFH plan.

ALSC Comment #3. Third, the Municipality's responses to questions posed by AFH Tool (or the Municipality itself, where questions do not track the content of the AFH Tool) are often deficient in various ways. Some responses fail to address the question. Some responses contradict the evidence provided by HUD for the Draft AFH. Many responses lack analysis and detail. We recommend that the Municipality review the responses in the Draft AFH to ensure that they all address the question asked, contain the necessary data and information, and contain the required analysis. Based on these responses and the accompanying data, we recommend that the Municipality identify and prioritizing contributing factors to fair housing issues in Anchorage.

DHHS Response #3. On January 13, 2017 (Friday) HUD announced the availability of the updated Assessment Tool for local governments that receive HUD formula funding to conduct and submit an AFH plan. The Municipality noted that there were no significant changes to the HUD Assessment Tool so went forward as scheduled with the 30-day public comment period for the draft AFH plan on January 18, 2017 (Wednesday). The Municipality will incorporate all required information in the final AFH plan. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information,

and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Comment #4. Fourth, the Municipality’s Draft AFH fails to create acceptable fair housing goals. The Municipality’s goals in the Draft AFH lack metrics, milestones, and timeframes for achievement. The goals do not provide a strategy for addressing the Mountain View and Government Hill Regionally or Ethnically Concentrated Area of Poverty (R/ECAP). In short, the goals are vague and do not seem designed to have an impact of fair housing issues. We recommend that the Municipality reconsider and revise its goals so that they will contribute to affirmatively furthering fair housing.

DHHS Response #4. HUD calculates R/ECAP area based on the 2010 census data. R/ECAP is a Census Tract where at least 50% of the population is non-White and/or Hispanic and has an income threshold that looks at the poverty rate. The poverty rate on that Census Tract has to be either 40% or more or three times the rate of the poverty rate for that Municipality as a whole.

The HUD analysis of Anchorage has identified one (1) Racially or Ethnically Concentrated Area of Poverty (R/ECAP), the Mountain View and Government Hill neighborhoods. Throughout the AFH plan, data supports that both neighborhoods have access to financial investment, public transportation, schools, jobs and other basic services. Mountain View neighborhood has had substantial improvement in infrastructure such as schools, affordable housing, and health and safety conditions. Neither neighborhood is geographic isolated.

The Municipality will revise the fair housing goals section of the AFH plan to include metric milestones that measures outcomes and performance.

ALSC Community Participation Comment #5. HUD’s AFH Tool 3 requires that the Municipality describe efforts it made to “include those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient, and persons with disabilities.” The Municipality was also required to “[b]riefly explain how [the Municipality’s outreach activities] were designed to reach the broadest audience possible.”

On pages 4-5 of the Draft AFH, the Municipality describes its community engagement methods. The Municipality’s public outreach did not include specific outreach to areas identified as R/ECAP, Mountain View and Government Hill. For instance, per Table 1, the Municipality did not meet with the Mountain View, Government Hill, or Fairview Community Councils. There is no indication that the Alaska Mental Health Trust Authority was consulted as required by the Municipality’s Citizen Participation Plan. The Municipality also did not describe how its methods for public participation were designed to reach the broadest audience possible.

DHHS Response #5. The Municipality will updated the list of community participants in the final AFH plan to include the contact with the neighborhoods of Mountain View and Fairview that were omitted in the draft AFH plan. The Municipality followed the Citizen Participation Plan that was amended to include the AFH plan, as required and approved by HUD, before the Municipality could start working on the AFH plan. The amended Citizen Participation Plan will

be included in the Municipality's Housing and Community Development Consolidated Plan for 2018-2022. The Municipality will include a complete description of all community participation in the final AFH plan.

ALSC Community Participation Comment #6. In addition, the Draft AFH includes summaries from oral comments from just 2 of the 30 events listed in Table 1. It is therefore not clear if or how oral comments from these events were incorporated. For example, as noted in the Draft AFH, Municipality staff met with staff from Alaska Legal Services Corp. on November 17, 2016. At that meeting, Jeremy Baker of ALSC noted that displacement of mobile home residents is an issue, and recommended that the Municipality consider strategies to address this. However, there is no discussion of strategies to counter displacement of mobile home owners in the Draft AFH.

DHHS Response #6. The Municipality will include transcripts from the two public hearings and public comment periods as an appendix to the final AFH plan. The Municipality included as a goal/activity in the draft AFH plan that DHHS will budget a portion of HUD grant funds for repairing roofs and boilers in housing owned by low-income residents in the Municipality of Anchorage each year of the 5 years of the AFH Plan this would include mobile homes (see A1 Goal and A1 Activity).

ALSC Community Participation Comment #7. The AFH Tool also required the Municipality to analyze the success of "efforts at eliciting meaning community participation," and to explain any reasons for low participation. The Municipality's answer to this question, on page 6 of the Draft AFH, merely summarizes the strategy used by the Municipality. It does not assess the success of those efforts. Notably, no detail is provided on outreach efforts and success to R/ECAP residents, Limited English Proficiency residents, and persons with disabilities. On page 8, the Municipality notes it received 332 completed surveys, which is approximately a tenth of a percent (0.1%) of Anchorage's population. This appears to be low participation and the Draft AFH does not offer any analysis. A review of the Municipality's public outreach strategy and its effectiveness is required and is likely to yield insight into how to improve future public participation. For example, the Municipality could consider whether including and promoting the AFH process on its website or publication of the notice in a different format, in additional places, and in languages would have been efficient ways to increase public participation.

DHHS Response #7. The draft AFH plan was posted as a Public Notice for a 30 day public comment period in the Alaska Dispatch, posted on the Municipality's DHHS website and later on the Municipality's front page website, emailed to the citizen participation list maintained by DHHS and the Anchorage Coalition to End Homelessness (ACEH) membership list, emailed to partner agencies that participated in drafting the AHFC plan, and paper copies were made available at the Loussac Library, ACEH office and Public Housing's Anchorage Family Investment Center. The participation of all residents was encouraged and reasonable accommodation was offered for those residents with disabilities who need auxiliary aids, services, or special modifications and non-speaking English residents.

As stated on page 53 of the draft AFH plan, the Municipality departments have access to a [system called Language Link, which has dozens of translators on hand. The individual points to](#)

their language on a poster of the department and the Municipal employee calls the 1-800 number which connects them to a translator. The translator then speaks via speaker phone to the individual.

As stated in the draft AFH plan on page 5, the Municipality communicated with organizations serving various racial/ethnic groups to insure adequate involvement within Anchorage. The Municipality disseminated fair housing materials and the Fair Housing Survey to nonprofit organizations serving the Anchorage's culturally diverse population. Municipal staff would provide both a written and oral Fair Housing Survey for persons with disabilities and/or limited English proficiency. The Municipality offered language interpreters to clients with limited English proficiency at the DHHS Public Health Services (PHS) and Women Infants & Children (WIC) offices, which included the Native Health Services campus, where the survey was distributed. As an incentive for completing the survey at the PHS and WIC offices, two \$50 grocery store gift cards were awarded to the winners of drawings held for each office.

The Municipality determined that the efforts at eliciting meaningful community participation for the AFH plan was successful. The 332 survey responses is viewed as a success. The Municipality does not believe that posting a fair housing survey on the Municipal website would improve the outcome of a survey and reach the protected class groups of Anchorage residents. The Municipality believes the best way to involve the protected class groups of Anchorage residents is to go into the communities where they are meeting.

ALSC Community Participation Comment #8. Furthermore, the Municipality's survey only asked about past experiences of discrimination. It did not address many of the crucial aspects of the AFFH requirement, including disproportionate housing needs and access to community assets and areas of opportunity. The survey did indicate relatively high rates of people who had experienced housing discrimination as well as low rates of awareness of where to get help. This suggests a need for more fair housing education and enforcement.

DHHS Response #8. The AFH survey was drafted by the Municipality and vetted by Jeremy Baker, the Director of the Fair Housing Project at Alaska Legal Services Corporation, before the survey was finalized. A short four question Fair Housing Survey was developed that took less than 5 minutes to complete. As stated in the AFH plan on page 5, the survey was used as a tool to encourage the public to participate in the AFH plan discussion and talk about their fair housing concerns to the Municipality staff at the meetings and events. Whenever possible, the Municipality staff partnered with Jeremy Baker, Fair Housing Enforcement Project Director at Alaska Legal Services Corporation, when invited to give a presentation on AFFH process in developing the AFH plan for the Municipality and distribute the Fair Housing Survey.

ALSC Community Participation Comment #9. Comments noted but not accepted were not explained. For example, on page 8 of the Draft AFH, the Municipality notes that source of income discrimination against voucher holders was identified as an issue in comments on May 25, 2016, but there is no discussion in the Draft AFH of possible strategies to increase fair housing choice by eliminating source of income discrimination and no explanation as to why this what not considered. Similarly, later on the same page, the Municipality notes that inclusionary zoning was raised in comments on August 9, 2016. The Draft AFH does not offer a discussion of

inclusionary zoning as a strategy to address fair housing choice, nor an explanation as to why it was not considered.

DHHS Response #9. The Municipality will include transcripts from the two public hearings and public comment periods as an appendix to the final AFH plan. The Municipality included as a goal/activity in the draft AFH plan that the Municipality’s DHHS, Planning and Transportation Departments and Alaska Housing Finance Corporation will meet at least twice a year to evaluate and monitor barriers to fair housing and the progress of mix-income, affordable and accessible housing development in the Municipality of Anchorage (see A1 Goal and A1 Activity).

ALSC Community Participation Comment #10. The AFFH rule required the Municipality to amend its Citizen Participation Plan. It did, but the Municipality’s website has not yet been updated to reflect the AFH public participation process. We recommend that the Municipality update this website to help increase understanding of the role that the AFH plays in the planning process.

DHHS Response #10. The Municipality followed the Citizen Participation Plan that was amended to include the AHF plan, as required and approved by HUD, before the Municipality could start working on the AHF plan. The amended Citizen Participation Plan will be included in the Municipality’s Housing and Community Development Consolidated Plan for 2018-2022.

DHHS Response #11 -#26. Instead of repeating this text over numerous times, the following text should be referenced when reading DHHS responses #10 to #26. On January 13, 2017 (Friday) HUD announced the availability of the updated Assessment Tool for local governments that receive HUD formula funding to conduct and submit an AFH plan. The Municipality noted that there were no significant changes to the HUD Assessment Tool so went forward as scheduled with the 30-day public comment period for the draft AFH plan on January 18, 2017 (Wednesday). The Municipality will incorporate all modifications in the final AFH plan. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Questions Comment #11. For the sake of clarity, it is best to address these issues in list format. The AFH Tool sets out six required components of the AFH, identified by roman numerals: I. Cover Sheet; II. Executive Summary; III. Community Participation Process; IV. Assessment of Past Goals and Actions; V. Fair Housing Analysis; VI. Fair Housing Goals and Priorities. (References to the AFH below will use these roman numerals.)

One of the six required components of an AFH is an “Assessment of Past Goals, Actions, and Strategies.” See AFH Tool at IV on page 1. The Municipality’s Draft AFH does not contain this section. We recommended that this section be added, including a discussion of strategies and progress towards meeting fair housing issues identified in past Analysis of Impediments to Fair Housing reports, as well as other fair housing efforts (e.g., amending Title V to add additional

protected classes in 2015). This section should also discuss the Municipality's 2015 Conciliation Agreement with HUD and its implementation.

DHHS Response #11 The section on the assessment of past goals, actions, and strategies can be found on pages 60-61 in the draft AFH plan. The Municipality's 2015 Conciliation Agreement with HUD was resolved in 2015 and is not required to be included in the AFH plan for 2018-2022.

ALSC Problems with Questions Comment #12. The Municipality's Draft AFH does not contain or address the AFH Tool's prompt to "describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time," located at V(A)(2) in the AFH Tool.

DHHS Response #12. The section on the location of homeowners and renters in the jurisdiction and region as presented in HUD table 16 and Census Tract 2010 data on Anchorage neighborhoods will be added to the final AFH plan.

ALSC Problems with Questions Comment #13. The Municipality rewords the AFH Tool's prompt at IV(B)(i)(1)(c). The AFH Tool says to "Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area." In the Municipality's Draft AFH, this question appears as "Identify neighborhoods or areas in the Jurisdiction and Region where racial/ethnic groups are segregated and indicate the predominant groups of each" (pg. 12). The Municipality's rephrasing misses the point of the AFH Tool's prompt, which asks about "areas of relatively high segregation and integration."

DHHS Response #13. The section on areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area can be found on pages 12-16 in the draft AFH plan and HUD tables 1, 3 and 4. The Municipality will review Census Tract 2010 data on Anchorage neighborhoods race/ethnicity and include the data in the final AFH plan.

ALSC Problems with Questions Comment #14. The Municipality's Draft AFH does not contain or address the AFH Tool's prompt to "consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas," at V(B)(i)(1)(d).

DHHS Response #14. The section on race/ethnicity of homeowners and renters in the jurisdiction and region as presented in HUD table 16 will be added to the final AFH plan.

ALSC Problems with Questions Comment #15. The Municipality's Draft AFH does not contain or address the AFH Tool's prompt to "discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future," at V(B)(i)(1)(f).

DHHS Response #15. The section on demographic trends can be found on pages 11-12 in the draft AFH plan and HUD table 3.

ALSC Problems with Questions Comment #16. The Municipality's Draft AFH does not contain the "Contributing Factors of Segregation" analysis required by V(B)(i)(3). On page 16 of the Draft AFH, the Municipality purports to be examining "Determination of Segregation/R/ECAPs." However, the AFH Tool indicates that a separate discussion of these two topics is needed, as there may be differences in the applicability and priority of contributing factors. In addition, it is not clear that all potential contributing factors included in the AFH Tool for Segregation and R/ECAPs were considered

For example, the second potential contributing factor for R/ECAPs provided in the AFH Tool (pg. 3) is "Deteriorated and abandoned properties." The Mountain View Community Neighborhood Plan, which was adopted by the Anchorage Assembly on September 13, 2016 and is available on the home page of the Municipality's Planning Division, lists "Encourage redevelopment of blighted and vacant properties" as one of the report's Top Five Priorities for Mountain View. Despite the prompt from HUD and the presence of local knowledge indicating that this deteriorated and vacant properties are a significant problem, it does not appear in the Municipality's discussion of R/E CAP contributing factors.

The Municipality's Draft AFH does not contain the AFH Tool's prompt to "describe how R/ECAPs have changed over time (since 1990)," located at V(B)(ii)(1)(c) of the AFH Tool.

DHHS Response #16. The Municipality will add to the final AFH plan more recent data and information from the Mountain View Community Neighborhood Plan, which was adopted by the Anchorage Assembly on September 13, 2016.

ALSC Problems with Questions Comment #17. Pursuant to section IV(B)(iii)(1)(b)(iii) of the AFH Tool, the Municipality's Draft AFH should have answered the question "which racial/ethnic, national origin, or family status groups are least successful in accessing employment?" The Municipality did not ask nor answer this question in its Draft AFH.

DHHS Response #17. The section on racial/ethnic, national origin, or family status groups that are least successful in accessing employment can be found on pages 32-33 in the draft AFH plan and HUD table 12.

ALSC Problems with Questions Comment #18. The Municipality's Draft AFH prompt at page 34 assesses transportation access in the context of race, ethnicity and national origin. However, the AFH Tool's prompt at (V)(B)(iii)(1)(c)(i), on page 4, includes "disparities in access to transportation based on place of residence, cost or other transportation related factors."

DHHS Response #18. The section on the disparities in access to transportation based on place of residence, cost or other transportation related factors can be found on pages 33-41 in the draft AFH plan and HUD table 12.

ALSC Problems with Questions Comment #19. On page 42 of its Draft AFH, the Municipality asks the question “Which neighborhood or areas stand out as having particularly low and particularly high exposure to neighborhood poverty? Identify the predominant race/ethnicity, national origin or family status of the residents of each.” However, the AFH Tool splits this analysis into three questions with a different focus. See V(B)(iii)(1)(d)(ii)-(iv).8 In short, the Municipality’s phrasing of its question misses the point of the AFH Tool’s question and lacks the AFH Tool’s specificity.

DHHS Response #19. The section on neighborhood or areas as having particularly low and particularly high exposure to neighborhood poverty can be found on pages 41-43 in the draft AFH plan and HUD table 12

ALSC Problems with Questions Comment #20. The Draft AFH’s “Determinants of Disparities in Access to Community Assets and Adverse Community Factors” on page 45 does not correspond to the AFH Tool’s “Contributing Factors of Disparities in Access to Opportunity” at V(B)(iii)(3) on page 5. It is not clear that all potential contributing factors included in the AFH Tool were considered.

DHHS Response #20. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Questions Comment #21. The Draft AFH does not contain or address the AFH Tool’s prompt at V(B)(iv)(1)(d), “Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.”

DHHS Response #21. There is no HUD data or local data to answer the AFH tool question “Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.” The Municipality will make this statement in the final AFH plan.

ALSC Problems with Questions Comment #22. The Municipality’s Draft AFH does not contain or address the prompt located at V(C)(1)(b)(iv) on page 7 of the AFH Tool regarding demographics in subsidized housing.

DHHS Response #22. The section on the demographics in subsidized housing can be found on pages 17-21 in the draft AFH plan and HUD table 6, 7 and 8.

ALSC Problems with Questions Comment #23. The Draft AFH’s “Determinants of Segregation/R/ECAPs Related to Publicly Supported Housing Location and Occupancy” does not conform to the AFH Tool’s “Contributing Factors of Publicly Supported Housing Location and Occupancy” on page 8. It is not clear that all potential contributing factors included in the AFH Tool were considered.

DHHS Response #23. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Questions Comment #24. The Draft AFH does not contain or sufficiently address the AFH Tool’s prompt to “Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities,” located at V(D)(5)(a) on page 9.

DHHS Response #24. The disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities can be found on pages 45-54 in the draft AFH plan and HUD tables 13, 14 and 15.

ALSC Problems with Questions Comment #25. The Municipality’s Draft AFH does not contain or sufficiently address the AFH Tool’s prompt to “Describe any state or local fair housing laws. What characteristics are protected under each law?” located at V(E)(2) on page 10. The Draft AFH’s Executive Summary (p. 3) does include a statement that Alaska and Anchorage law add some additional protected classes, but the Draft AFH fails to mention that sexual orientation and gender identity became protected classes in the Municipality in 2015.

DHHS Response #25. The Municipality will list the additional State and Municipal protected classes in the Executive Summary of the final AFH plan.

ALSC Problems with Questions Comment #26. On page 56, the Draft AFH assesses “Fair Housing and Compliance and Infrastructure Determinants.” It is unclear what the origin of this section is but its most likely analog in the AFH Tool is at V(E)(5) “Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors” on page 11 of the AFH Tool. It is not clear that all potential contributing factors included in the AFH Tool for this section were considered.

As the illustrated by the list above, there are many times in the Municipality’s Draft AFH where either 1) a question or prompt from the AFH Tool is omitted or 2) a question or prompt from the AFH Tool is rephrased in a way that substantively changes it. Given the extent of this problem we recommend that the Municipality revise the Draft AFH to track the content and prompts as set forth in the AFH Tool.

DHHS Response #26. The Municipality will incorporate all modifications in the final AFH plan. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Responses Comment #27. For the sake of clarity, it is best to address these issues in list format. The Draft AFH’s Executive Summary does not “summarize the fair housing issues, significant contributing factors, and goals” identified in the Draft AFH. It also

does not “include an overview of the process and analysis used to reach the goals.” This content is required in the executive summary by the AFH Tool at II (pg. 1).

DHHS Response #27. The section on the summarize the fair housing issues, significant contributing factors, and goals can be found on pages 57-60 in the draft AFH plan. The Municipality will add an overview of the process and analysis used to reach the goals in the final AFH plan.

ALSC Problems with Responses Comment #28. On page 10, the Draft AFH contains the prompt to “Describe and compare segregation levels in the Jurisdiction and Region. Identify the racial/ethnic groups that experience the highest levels of segregation in the Jurisdiction and Region.” The Draft AFH’s answer does not identify specific racial or ethnic groups that experience the highest levels of segregation. It also does not address the Mountain View and Government Hill R/ECAP, which is relevant to the prompt.

DHHS Response #28. The section that describes and compares segregation levels in the jurisdiction and region can be found on pages 10-17 in the draft AFH plan and HUD tables 1, 3 and 4. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Responses Comment #29. On page 11, the Draft AFH contains the prompt “Explain how levels of segregation have changed over time for the Jurisdiction and Region.” The Draft AFH’s answer does a good job explaining the difficulty in measuring segregation. However, there is a problematic part of the response. In noting there are some moderate segregation values, the Municipality writes “The CBSA region dissimilarity indexes cannot be interpreted as significant due to the low population of the Black, Hispanic and Asian or Pacific Islander [sic] in the region.” But on page 10, the Municipality noted that people of Asian or Pacific Island origin make up 12% of Anchorage while those of Hispanic origin make up 9%. These populations do not seem so low as to be insignificant regarding dissimilarity indexes. Similarly, HUD’s *AFFH Rule Guidebook* notes that “when a group’s population is less than 1,000” caution should be used in interpreting the dissimilarity index. The populations of the aforementioned groups in Anchorage are all in excess of 15,000.

DHHS Response #29. Agree with the comment. The section on the dissimilarity index can be found on pages 11-12 in the draft AFH plan and HUD table 3. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Responses Comment #30. The Draft AFH’s answer to the prompt “Identify neighborhoods or areas in the Jurisdiction and Region where racial/ethnic groups are

segregated and indicate the predominant groups of each,” on page 12 contradicts the chart and text provided in response to the previous prompt immediately above it (on the same page). The Draft AFH states “The trend in Anchorage has been toward less segregation based on race/ethnicity” but the Racial/Ethnic Dissimilarity Trends chart shows a rise in segregation across race or ethnic groups and the corresponding text states that “[t]he 10 year trend for Anchorage has an increase for the four racial/ethnic dissimilarity indexes.”

DHHS Response #30. Agree with the comment. The section on the dissimilarity index and the diversity index that are different racial/ethnicity measures and can be found on pages 11-12 in the draft AFH plan and HUD table 3. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Responses Comment #31. In its answer to the prompt “Describe the extent to which R/ECAP tracts are grouped together or scattered. Identify any groupings of R/ECAP tracts within the Jurisdiction,” on page 12-13, the Municipality pushes back against HUD’s finding that Mountain View and Government Hill is a R/ECAP. “A reason why Mountain View ranks as so diverse may not seem intuitive at first. People from around the world live there but a significant percentage of whites also live there. Government Hill neighborhood has very few residential housing [sic] since it is mostly occupied by the Ship Creek neighborhood that is industrial land operated by the railroad and Port of Anchorage.” Despite the percentage of white people living in Mountain View and the industrial nature of Government Hill, HUD has found the area to be an R/ECAP based on its high concentration of minority residents and economic characteristics. The Municipality’s response does not address the prompt.

DHHS Response #31. MOA will not make a statement about whether or not Anchorage has race/ethnic segregated housing patterns in neighborhoods. MOA will state Anchorage has income segregation patterns in neighborhoods in the final AFH plan. MOA believes that the HUD and local data supports this conclusion.

ALSC Problems with Responses Comment #32. The Draft AFH’s answer to the question “Which groups are disproportionately represented in R/ECAPs compared to the Jurisdiction and Region?” on page 16 states in part, “There are no groups disproportionately represented in R/ECAPs compared to other neighborhoods in Anchorage and the Mat-Su Borough.” This statement appears to contradict the data. According to the data provided in the Draft AFH on pages 9 and 13, the population of the Mountain View and Government Hill R/ECAP is 24% White (compared to 62.6% citywide), 15.98% Alaska Native or American Indian (7.9% citywide), 12.71% Black or African American (5.3% citywide), 25.88% Asian or Pacific Islander (9.9% citywide) and 11.89% Hispanic (7.6% citywide).

DHHS Response #32. This statement will be removed from the final AFH plan.

ALSC Problems with Responses Comment #33. On Page 13, the Draft AFH states “There are no relevant characteristics that set the Mountain View and Government Hill neighborhoods apart from non-R/ECAP neighborhoods in Anchorage.” The prompt asked for information that might set the R/ECAP apart “including patterns of financial investment, transportation and other basic services, infrastructure, health and safety conditions and geographic isolation.” This response is contrary to common local knowledge and readily available local data.

The Mountain View Community Action Plan, which was adopted by the Anchorage Assembly on September 13, 2016, is available on the home page of the Municipality of Anchorage Planning Division. The following is an excerpt from that document’s description of the characteristics that set Mountain View and Government Hill apart from other neighborhoods in Anchorage:

The neighborhood was rezoned in 1965 to allow R-3 and R-4 development, which allowed multi-family housing to be constructed on lots that had previously been single-family. This change allowed Mountain View to serve the housing needs of the population surge during the Alaska Oil Pipeline construction of the 1970s and early 1980s. The area began transitioning in the 1970s from a stable, relatively healthy neighborhood on the edge of Anchorage to one in social distress. During this time, four-plex and multi-family apartment buildings were constructed, redefining the character of the neighborhood. Rental housing, originally filled with single persons or small families, transitioned to larger families needing affordable housing. These housing options later attracted many people immigrating to Anchorage from other countries, maintaining a constant demand for affordable rental housing. Local entities responded to this demand by providing more housing for low-income families and individuals.

Since that time, the rest of Anchorage has become more educated, more prosperous and less transient, while Mountain View has experienced the opposite. The local poverty rate climbed steadily from 7.5% in 1970 to 16.2% in 1980 to 23.3% in 1990 to 25.1% in 2000. In 2010, Mountain View had a poverty rate of 24.3%. The citywide poverty rate remained roughly 7% throughout this entire period. While the portion of residents in the same house five years before each census increased from 22% in 1970 to 57.3% in 2010 for Anchorage as a whole, it only increased from 20% to 40.8% in Mountain View; and, while the proportion of residents without a high school diploma decreased for the city as a whole from 12% in 1980 to 8.1% in 2010, for Mountain View during the same time period that proportion increased from 22% to 32%.

These data demonstrate that in the 1970s Mountain View was on par with the rest of Anchorage, but in the 1980s and 1990s, the neighborhood degraded considerably and became an area dominated by low income households. Those characteristics severely limited the buying power of the local area, which in turn hampered business development. The result is a neighborhood that has often been more a place of last resort than a community of choice. According to the American Community Survey’s 5-year estimates, in 2013, nine out of ten Mountain View residents were bringing home an annual income of less than 70 percent of the Anchorage area median income, and 28.9% of the Mountain View population had an income below the poverty level.

In analyzing and addressing Anchorage's R/ECAP area for purposes of the AFH, the Mountain View and Government Hill Community Councils, we recommend that neighboring community councils such as Fairview, the Anchorage Land Trust, local residents, and the Municipality's Planning and Public Transportation Departments be consulted.

DHHS Response #33. Other than the designation as a R/ECAP, the neighborhoods of Mountain View and Government Hill have no relevant characteristics that set these neighborhoods apart from other neighborhoods in Anchorage. Throughout the AFH plan, data supports that both neighborhoods have access to financial investment, public transportation, schools, jobs and other basic services. Mountain View neighborhood has had improvement in infrastructure such as schools, affordable housing, and health and safety conditions. Neither neighborhood is geographic isolated. The sections on the public transportation, schools, jobs and other basic services can be found on pages 28-45 in the draft AFH plan and HUD table 12.

The Municipality will add to the final AFH plan more recent data and information from the Mountain View Community Neighborhood Plan, which was adopted by the Anchorage Assembly on September 13, 2016.

The Municipality did attempt to meet with the Mountain View and Government Hill Community Councils. The Municipality did meet with the Fairview Community Council (omitted in the draft AFH plan) and five times with the Municipality's Planning and Public Transportation Departments as stated on page 6-7 of the draft AFH plan.

ALSC Problems with Responses Comment #34. On page 14, the Draft AFH contains the prompt "Identify neighborhoods or areas in the Jurisdiction and Region where any national origin group is segregated and indicate the predominant groups in each. Identify any neighborhoods or areas where either segregation or integration by national origin has changed over time." The Draft AFH responds, "Most neighborhoods in Anchorage and in the Mat-Su Borough have become more racially/ethnically diversified and integrated over the last 10 years." This answer fails to address the prompt. Even if it is true that most neighborhoods have become more integrated (which, again, does not seem supported by the data), the answer implies there are some neighborhoods that have not become more integrated. In any case, the Draft AFH does not identify specific neighborhoods nor does it refer to specific data on this subject.

DHHS Response #34. The Municipality will add Census Tract 2010 neighborhood racial/ethnicity data in the final AFH plan. The section on the demographics and segregation/integration can be found on pages 9-16 in the draft AFH plan and HUD tables 2 and 4.

ALSC Problems with Responses Comment #35. On page 14, the Draft AFH contains the prompt "Which neighborhoods or areas segregated by race/ethnicity or nation origin, including any R/ECAPs, have persisted across multiple decades? Explain." The Draft AFH responds, "Most neighborhoods in Anchorage have become more racially/ethnically diversified and integrated over the last 10 or more years." Again, this answer does not address the prompt. It does not identify specific neighborhoods. It does not address the Mountain View and Government Hill R/ECAP. It does not refer to specific data on the topic.

DHHS Response #35. The Municipality will add Census Tract 2010 neighborhood racial/ethnicity data in the final AFH plan. The section on the demographics and segregation/integration can be found on pages 9-16 in the draft AFH plan and HUD tables 2 and 4.

ALSC Problems with Responses Comment #36. On page 28, the Draft AFH contains the prompt “Discuss whether students of any particular race/ethnicity or national origin group(s) have far greater access to high-performing elementary schools than students of different race/ethnicity or national origin group(s). How does the number of high-performing elementary schools located in R/ECAPs compare to the number of high-performing schools located outside of those areas?” The Draft AFH’s answer merely describes the school district generally and supplies unanalyzed screen shots (in which it is unclear what the supplied percentages represent) on the next page. The answer does not clearly assess school access nor does it specifically discuss the schools located within the Mountain View and Government Hill R/ECAP.

DHHS Response #36. The Draft AFH plan addresses the question using HUD data. The section on the schools and education can be found on pages 28-33 in the draft AFH plan and HUD table 12.

ALSC Problems with Responses Comment #37. On page 30, the Draft AFH contains the prompt “to the extent possible, perform the same analysis for middle and high schools.” Again, the answer merely provides an overview of the school district. It does not get into any specifics regarding school access or the R/ECAP.

DHHS Response #37. The Draft AFH plan addresses the question using HUD data. The section on the schools and education can be found on pages 28-33 in the draft AFH plan and HUD table 12.

ALSC Problems with Responses Comment #38. The Draft AFH’s answer on page 31 does not specifically address how a place of residence impacts a student’s ability to attend a proficient elementary, middle or high school.

DHHS Response #38. The Draft AFH plan addresses the question using HUD data. The section on the schools and education can be found on pages 28-33 in the draft AFH plan and HUD table 12 and HUD map 7.

ALSC Problems with Responses Comment #39. On page 32, the Draft AFH contains the question, “Describe any disparities in access to jobs and labor markets by race/ethnicity.” The Municipality’s answer makes no reference to protected class as it relates to job proximity, nor does it reference race or ethnicity.

DHHS Response #39. The Draft AFH plan addresses the question using HUD data. The section on the jobs and unemployment can be found on pages 32-33 in the draft AFH plan and HUD table 12.

ALSC Problems with Responses Comment #40. On page 33, the Draft AFH contains the prompt, “Identify and discuss any job training or employment programs in the Jurisdiction or Region that assist residents of neighborhoods and areas with high unemployment such as R/ECAPs to find and obtain jobs.” The Municipality’s answer to this question does not address the prompt. It merely outlines the recent trends in the Anchorage economy generally.

DHHS Response #40. Agree with the comment. The Final AFH will include the workforce partnerships taking place in the Mountain View neighborhood.

ALSC Problems with Responses Comment #41. On page 35, the Draft AFH contains the prompt, “To what extent do the public transportation system of the Jurisdiction or Region provide a reliable bridge between low-asset/high poverty areas such as R/ECAPs and; a. asset-rich/low poverty areas b. proficient schools c. jobs and d. other key community assets.” The Municipality’s answer to this prompt lacks analysis beyond noting Mountain View and Government Hill are near downtown and thus near the Downtown Transit Center, and that the Mountain View bus line has frequent service. We suggest that this answer should include addressing points raised in the 2016 Mountain View Community Targeted Neighborhood Plan regarding the need for more bus routes serving Mountain View, which was noted as a “Top Five Priority.”

DHHS Response #41. The Draft AFH plan addresses the question. The most frequent public transit line, 45-Mountain View, is useful and reliable enough that 5%, and in more limited cases 15%, of residents are choosing to rely on it. The section on the public transportation can be found on pages 33-41 in the draft AFH plan and HUD table 12.

ALSC Problems with Responses Comment #42. On page 36, the Draft AFH briefly discusses the Public Transportation Department’s two proposed public transit plans (80% Ridership and 100% Ridership Concepts). Both plans have the potential to cut or eliminate bus service to areas of opportunity and community assets (e.g. South Anchorage) and for certain residents of publicly assisted housing. We recommend that the potential implications of each proposed plan on protected class groups and the R/ECAP be evaluated in the AFH.

DHHS Response #42. Disagree with the comment. As stated in the draft AFH plan, the neighborhood of Mountain View will not be impacted by the proposed changes in transit. The implications of the proposed changes in transit to neighborhoods are stated in the draft AFH plan. The section on the public transportation can be found on pages 33-41 in the draft AFH plan and HUD table 12.

ALSC Problems with Responses Comment #43. On page 41, the Draft AFH contains the prompt “Describe any disparities in exposure to poverty by race/ethnicity.” The Municipality’s answer does not analyze any disparities in exposure to poverty based on protected class, including race and ethnicity. It also states: “Anchorage doesn’t have racial/ethnic segregated housing needs. Anchorage does have income segregated housing needs.” This statement, which appears repeatedly in the Draft AFH, is problematic on a number of levels. First, Anchorage has a racially or ethnically concentrated area of poverty (R/ECAP), as defined by the federal government. Therefore, it is not consistent with the HUD-provided information to say that

Anchorage does not have any racially or ethnically segregated housing patterns. Furthermore, among the low-income population in Anchorage, for example individuals at 125% of the poverty level or less, the majority are people of color. This means that income-segregated housing patterns are, in effect, racially segregated housing patterns.

DHHS Response #43. The MOA will remove the statement about whether or not Anchorage has race/ethnic segregated housing patterns in neighborhoods. MOA will state Anchorage has income segregation patterns in neighborhoods in the final AFH plan. HUD and Census Tract 2010 data documents that neighborhoods are not racially/ethnicity segregated in Anchorage. The section on the demographics and segregation/integration can be found on pages 9-16 in the draft AFH plan and HUD tables 2, 3 and 4.

ALSC Problems with Responses Comment #44. On page 42, the Draft AFH contains the question “Which neighborhoods or areas stand out as having particularly low and particularly high exposure to neighborhood poverty? Identify the predominant race/ethnicity, national origin or family status of the residents of each.” The Municipality’s answer does not address what neighborhoods are more exposed to poverty nor what populations are exposed to poverty.

DHHS Response #44. The Municipality will add Census Tract 2010 neighborhood poverty data if it is available in the final AFH plan. The section on the demographics and segregation/integration can be found on pages 9-16 in the draft AFH plan and HUD tables 2, 3 and 4.

ALSC Problems with Responses Comment #45. On page 44, in response to a prompt regarding Adverse Community Factors, the Municipality states, “No neighborhoods in Anchorage and the other communities of the Municipality have any known adverse community factors.” This is not consistent with local knowledge and data. For example, high crime rates should be regarded as an adverse community factor. As noted in the Mountain View Community Targeted Neighborhood Plan, Mountain View continues to have a much higher crime rate than Anchorage as a whole. “The Anchorage Police Department Annual Statistical Report from 2010 reveals alarming rates of reported homicide, sexual assaults, missing persons, assaults, and theft when compared to Anchorage as a whole. This report indicates that in 2010, 23.5% of Anchorage homicides occurred in Mountain View, as did 19.3% of thefts; 18.5% of the city’s missing persons cases were reported from Mountain View, as were 32.4% of reported assaults. These statistics are startling because Mountain View is just 2.3% of the overall population of Anchorage.”

DHHS Response #45. The HUD AFH tool which is the bases for the contents of the AFH plan does not include any questions on criminal activity in a neighborhood as an adverse community factor as it relates to fair housing. The section on the exposure to adverse community factors can be found on pages 41-45 in the draft AFH plan.

ALSC Problems with Responses Comment #46. On page 44, the Draft AFH contains the prompt, “Identify and discuss any overarching patterns of access to assets and exposure to adverse community factors based on race/ethnicity, national origin and familial status.” The Municipality’s answer does a good job describing the housing issues presented by those who are re-entering society following incarceration. While this is relevant, discussion of a single issue is

not sufficient. For example, despite the Municipality's emphasis on addressing homelessness, including gathering and analyzing data, the AFH does not include a discussion of Anchorage's homeless population or detailed data on the number of subsidized housing units needed to house these residents. We recommend that data on the Municipality's homeless population be included in the AFH.

DHHS Response #46. Disagree with comment. The HUD AFH tool which is the bases for the contents of the AFH plan asks the question about access to assets and exposure to adverse community factors based on racial/ethnicity, national origin and familial status as it relates to fair housing. The Municipality's homeless population is not a racial/ethnicity, national origin and familial status problem as it relates to fair housing. The Municipality's homeless population is an affordable housing shortage problem that is addressed throughout the draft AFH plan. The section on the access to assets and exposure to adverse community factors can be found on pages 41-45 in the draft AFH plan.

ALSC Problems with Responses Comment #47. On page 25, the Draft AFH asks, "Which groups (by race/ethnicity, national origin, and family status) are more likely than other groups to experience housing cost burden, overcrowding or substandard housing? Explain." The Municipality's answer is correct in noting the plight of Asian or Pacific Island residents and Black residents. However, the Municipality fails to address the housing cost burden of Hispanic and Native American residents. In addition, the Municipality's answer fails to compare and contrast groups, most notably as it relates to White residents. According to the data in the Draft AFH, 29.66% of White residents have disproportionate needs as compared to 44.629% of Native American residents, the next lowest percentage.

DHHS Response #47. The section on the disproportionate housing need can be found on pages 25-28 in the draft AFH plan and in HUD tables 9 and 11. The Municipality will review the responses in the draft AFH plan to ensure that all questions are addressed with the necessary data, information, and analysis. When the Municipality determines that HUD and local data is not available to address a question, the Municipality will state this is the case in the final AFH plan.

ALSC Problems with Responses Comment #48. On page 26, the Draft AFH contains the prompt, "Which groups disproportionately experience severe housing burdens? Explain." The Draft AFH states that Asian and Pacific Islander groups are most likely to experience severe housing burdens, but does not discuss other groups. The Draft AFH's explanation inappropriately points to family size as the reason these groups disproportionately experience severe housing burdens: "Residents who identify as Asian or Pacific Islander often have large families and as a result may experience overcrowding and substandard housing." (pg. 26) No further analysis or explanation is provided.

DHHS Response #48. This statement will be removed from the Final AFH plan as no such information is provided in the HUD data. The section on the disproportionate housing need can be found on pages 25-28 in the draft AFH plan and in HUD tables 9 and 11.

ALSC Problems with Responses Comment #49. On page 27, the Draft AFH contain the prompt, “Summarize and discuss areas within the Jurisdiction and Region with notable patterns of housing needs. Which areas experience the greatest housing needs? Which of these areas align with segregated areas or R/ECAPs and what is/are the predominant race/ethnicity or national origin group(s) in such areas.” The Municipality’s answer provides a good summary but no analysis. It does not address race, ethnicity, or national origin in areas with housing needs. And it does not address the R/ECAP specifically other than noting Mountain View and Government Hill have high-density housing.

DHHS Response #49. The Municipality can only site the data that has been provided by the HUD AFH tools and local data that is available. The MOA has no additional data. The section on the disproportionate housing need can be found on pages 25-28 in the draft AFH plan and HUD tables 9 and 11.

ALSC Problems with Responses Comment #50. On page 26, the Draft AFH contains the question, “To what extent do patterns of housing burdens or housing needs disproportionately affect LEP persons or new immigrants.” The Municipality’s answer does not address proportionality.

DHHS Response #50. The Municipality can only site the data that has been provided by the HUD AFH tools and local data that is available. The MOA has no additional data. The section on the disproportionate housing need can be found on pages 25-28 in the draft AFH plan and HUD tables 9 and 11.

ALSC Problems with Responses Comment #51. On page 17, the Draft AFH contains the prompt “Compare the demographics of residents in each publicly supported housing category to the population in general and to persons earning 30% AMI.” The Municipality’s answer does not compare demographics in public housing to the general population, nor does it distinguish between types of public housing.

DHHS Response #51. Agree with the comment. The Municipality will review Census Tract 2010 data and HUD table 6 to compare demographics in public housing to the general population in the final AFH plan.

ALSC Problems with Responses Comment #52. On page 18, the Draft AFH contains the prompt, “Describe any patterns relating to occupancy of publicly supported housing by color, national origin, family status or religion.” The Municipality’s answer states “no patterns relating to occupancy of publicly supported housing by color, national origin, family status or religion can be defined in Anchorage.” The answer lacks analysis or reference to any data, and is contradicted by data provided elsewhere. For example, Tables 7 and 8 (Draft AFH pages 18 and 19) indicate that Whites are unrepresented and minorities are overrepresented, relative to the total population, in publicly supported housing in Anchorage.

DHHS Response #52. Agree with the comment. The Municipality will review Census Tract 2010 data and HUD table 7 to identify patterns relating to occupancy of publicly supported housing by color, national origin or family status in the final AFH plan.

ALSC Problems with Responses Comment #53. On page 18, the Draft AFH contains the prompt, “Describe patterns in the siting of the categories of housing presented above. Describe in particular any differences in siting patterns for housing that serves families, elderly or individuals with disabilities.” The Municipality’s answer provides a general synopsis of public housing but does not provide analysis or detail. It does not address the Mountain View and Government Hill R/ECAP. It does not identify any patterns.

DHHS Response #53. Agree with the comment. The Municipality will review Census Tract 2010 data and HUD table 7 to describe in particular any differences in siting patterns for publicly supported housing that serves families, elderly or individuals with disabilities in the final AFH plan.

ALSC Problems with Responses Comment #54. On page 19, the Draft AFH contains the prompt, “Discuss to what extent to which public housing developments in the Jurisdiction are located in segregated neighborhoods or areas. Describe any patterns or outliers with respect to occupancy such as race/ethnicity.” The Municipality’s answer states “No patterns relating to occupancy of publicly supported housing by color, national origin, family status or religion can be defined in Anchorage neighborhoods.” The answer lacks analysis of, and is inconsistent with, the HUD-provided data.

DHHS Response #54. Disagree with the comment. Publicly supported housing is located throughout Anchorage as indicated in HUD table 8. The Municipality will review HUD table 8 to describe any outliers with respect to households with children in publicly supported housing in the final AFH plan

ALSC Problems with Responses Comment #55. On page 21, the Draft AFH contains the prompt, “Describe any patterns of HCV usage in particular neighborhoods or areas, including segregated neighborhoods and R/ECAPs, and identify the predominant race/ethnicity or national origin groups in such neighborhoods.” The Municipality’s answer states “No patterns of HCV usage in particular neighborhoods in Anchorage that is based on race/ethnicity national origin”. However, on page 19, the Draft AFH notes “anchorage residents who are White reside in the HCV program in non R/ECAP neighborhoods at 39.88% compared to 15.92% in the R/ECAP neighborhood.” The Municipality’s answer on page 19 seems to contradict its answer on page 21.

DHHS Response #55. The final AFH plan will reflect that HUD and local data is not available to address this question.

ALSC Problems with Responses Comment #56. On page 45, the Draft AFH contains the prompt, “Describe how persons with disabilities are geographically dispersed or concentrated in different areas of the Jurisdiction and Region, including R/ECAPs and other areas segregated by race/ethnicity or national origin. Discuss whether these patterns are the same or different for persons with each type of disability.” The Municipality’s answer discusses dispersion but it does not address the Mountain View and Government Hill R/ECAP specifically.

DHHS Response #56. The Municipality can only site the data that has been provided by the HUD AFH tools and local data that is available. There is no additional analysis that the Municipality is able to conduct without additional data. The section on the disability and access can be found on pages 45-54 in the draft AFH plan and HUD tables 13, 14 and 15.

ALSC Problems with Responses Comment #57. On page 47, the Draft AFH contains the prompt, “Discuss where affordable accessible housing units are located. Are they dispersed or concentrated in R/ECAPs or other areas that are segregated by race/ethnicity or national origin?” The Municipality’s answer states “Most of the assisted housing is concentrated in the most densely populated neighborhoods of Anchorage and not necessarily in the R/ECAP neighborhoods of Mountain View and Government Hill.” It is unclear what “not necessarily” means in this context. The answer also lacks analysis related to other potentially segregated areas.

DHHS Response #57. The Municipality can only site the data that has been provided by the HUD AFH tools and local data that is available. There is no additional analysis that the Municipality is able to conduct without additional data. The section on the disability and access can be found on pages 45-54 in the draft AFH plan and HUD tables 13, 14 and 15.

ALSC Problems with Responses Comment #58. On page 48, the Draft AFH contains the prompt, “Describe the extent to which persons with different disabilities are able to access and live in the different types of publicly supported housing...in the Jurisdiction or Region? How do designations, preferences waitlist procedures etc. impact this ability?” The Municipality’s answer generally describes the AHFC Class Program and Moving Home Program but does not analyze by disability type or public housing type.

As the above list shows, there are numerous times throughout the Draft AFH where the Municipality’s answer either 1) doesn’t respond to the prompt 2) goes against the data or contradicts other answers in the Draft AFH or 3) lacks analysis, data, or detail. We recommend that the Municipality review its answers to all questions in the Draft AFH to insure that a response that addresses the prompt is provided.

DHHS Response #58. The Municipality can only site the data that has been provided by the HUD AFH tools and local data that is available. There is no additional analysis that the Municipality is able to conduct without additional data. The section on the disability and access can be found on pages 45-54 in the draft AFH plan and HUD tables 13, 14 and 15.

ALSC Problems with Responses Comment #59. In addition, it is also important that the Municipality seek out and use available local data and local knowledge as required by the AFFH Final Rule. For example, the HUD-provided data often lacks information about the Alaska Native population. However, there is likely to be local data available to improve the discussion of housing issues faced by our Alaska Native residents. We recommend that the Municipality consider whether there are additional resources related to local data and knowledge that should be incorporated into the AFH.

DHHS Response #59. The Municipality used the HUD AFH tools and local data from the Anchorage School District, AHFC Public Housing, Municipality’s Department of Public Transportation, Municipality’s Planning Department, Governor’s Council on Disabilities and Special Education, State Department of Labor and Census Tract 2010 available to complete the draft AFH plan. There is no other HUD data or local data available.

ALSC Problems with Goals Comment #60. On page 11, the AFH Tool directs the Municipality to, “For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.”¹⁴ In the Draft AFH, the Municipality does not get into detail on housing issues nor contributing factors, nor does it justify the prioritization of contributing factors.

DHHS Response #60. The Municipality will justify the prioritization of the contributing factors that will be addressed in the executive summary and goals & priorities sections of the final AFH plan.

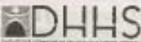
ALSC Problems with Goals Comment #61. The AFH Tool further directs the Municipality to, “for each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.” The Municipality’s goals are completely lacking in metrics. They are also completely lacking in milestones, as well as timeframes for achievements. The Municipality’s goals contain no discussion of how to address the Mountain View and Government Hill R/ECAP.

DHHS Response #61. The Municipality will revise the fair housing goals section of the final AFH plan to include metric milestones that measures outcomes and performance. The goals will address fair housing issues in the Municipality and not a particular neighborhood.

ALSC Problems with Goals Comment #62. The Draft AFH’s failure to properly identify and prioritize contributing factors, and the resultant vague goals, are inconsistent with HUD’s requirements and the Municipality’s duty to affirmatively further fair housing. We recommend that the Municipality undertake the required identification of contributing factors and set meaningful, measurable goals for incorporation into future planning processes.

DHHS Response #62. The Municipality will revise the fair housing goals section of the final AFH plan to include metric milestones that measures outcomes and performance. The goals will address fair housing issues in the Municipality and not a particular neighborhood.

Appendix D – Affidavit of Publication of the 1st and 2nd Public Notices

<p>269723 #1385790 \$2047.50</p> <h2 style="text-align: center;">AFFIDAVIT OF PUBLICATION</h2> <p>STATE OF ALASKA THIRD JUDICIAL DISTRICT</p> <p>Kayla Lavea being first duly sworn on oath deposes and says that he/she is a representative of the Alaska Dispatch News, a daily newspaper. That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on</p> <p>May 10, 2016</p> <p>and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.</p> <p>Signed <u>Kayla Lavea</u></p> <p>Subscribed and sworn to before me this <u>10</u> day of <u>MAY</u>, 2016</p> <p><u>Bretney Johnson</u></p> <p>Notary Public in and for The State of Alaska, Third Division Anchorage, Alaska MY COMMISSION EXPIRES <u>2/23/2019</u></p>	<div style="text-align: center;">  <h2 style="margin: 0;">PUBLIC NOTICE</h2>  <h3 style="margin: 0;">Municipality of Anchorage</h3> </div> <p style="text-align: center;">2018-2022 Housing and Community Development Consolidated Plan 2017 Action Plan Assessment of Fair Housing National Housing Trust Fund</p> <p style="text-align: center;">Notice of Public Hearing and 30 Day Public Comment Period</p> <p>In order to be eligible to receive CDBG, HOME, and ESG funds, the Municipality must submit a Consolidated Plan to the Department of Housing and Urban Development (HUD) every five years, and is required to update that plan annually with an Action Plan. The Consolidated Plan is an assessment and analysis of social and economic conditions and issues related to affordable housing, homelessness and community development. The Assessment of Fair Housing is to provide an assessment and planning process for taking actions to overcome patterns of segregation, promote fair housing choice, and foster inclusive housing free from discrimination. The National Housing Trust Fund is anticipated to compliment HUD funding to increase and preserve affordable housing for low-income and homeless families. The Assessment of Fair Housing and National Housing Trust Fund will be included in the Consolidated Plan. There will be several opportunities during the drafting of the plans for the public to comment and participate in the planning process.</p> <p>This is the first of three Public Hearings for the 2018-2022 Housing and Community Development Consolidated Plan, 2017 Action Plan, Assessment of Fair Housing and National Housing Trust Fund. A Public Hearing will be held on May 25th in the DHHS Conference Room #423, 825 L Street, Anchorage, starting at 3:30 PM. This is an opportunity for the Municipality to hear citizen views, recommend funding proposals and ask questions prior to the drafting of the plans. Written comments will also be accepted via email at the address listed below.</p> <p>The 2017 Action Plan outlines programming and budget priorities for the HUD CDBG, HOME, and ESG programs and the National Housing Trust Fund for the year 2017 and must be in accordance with the priorities outlined in the Municipality's 2013-2017 Housing and Community Development Consolidated Plan. All HOME activities are subject to 24 CFR Part 92; all CDBG activities are subject to 24 CFR Part 570, and all ESG funding are authorized under Subtitle B of Title IV, McKinney-Vento Homeless Assistance Act, 24 CFR Part 576, and National Housing Trust Fund 24 CFR Part 93.</p> <p>For more information, contact Nancy Anderson, CSD Program Manager, Municipality of Anchorage at 907-343-4876. Comments received by 4:00 PM, June 13, 2016 will be accepted by fax, email, mail or delivery to the following location:</p> <p>Mail: Municipality of Anchorage Department of Health and Human Services Public Health Initiatives and Partnerships Division Community Safety and Development Nancy Anderson, CSD Program Manager PO Box 196650 Anchorage, AK 99519-6650 249-7858</p> <p>Fax: 249-7858 Email: AndersonNV@muni.org Hand Delivery: 825 L Street, Room 506</p> <p>Persons who are non-English speaking who would like an interpreter to participate should contact Nancy Anderson at the contact information above.</p> <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">  <p>Persons with disabilities who need auxiliary aids, services, or special accommodations or modifications to participate should contact Pat Monday by telephone at 343-4822, fax at 249-7715 or e-mail MondayPC@muni.org.</p> </div> <div style="text-align: center;">  </div> </div>
---	--

269723
0001398730
\$578.92

AFFIDAVIT OF PUBLICATION

STATE OF ALASKA
THIRD JUDICIAL DISTRICT

Emma Dunlap
being first duly sworn on oath deposes and
says that he/she is a representative of the
Alaska Dispatch News, a daily newspaper.
That said newspaper has been approved
by the Third Judicial Court, Anchorage,
Alaska, and it now and has been published
in the English language continually as a
daily newspaper in Anchorage, Alaska, and
it is now and during all said time was
printed in an office maintained at the
aforesaid place of publication of said
newspaper. That the annexed is a copy of
an advertisement as it was published in
regular issues (and not in supplemental
form) of said newspaper on

January 18, 2017

and that such newspaper was regularly
distributed to its subscribers during all of
said period. That the full amount of the fee
charged for the foregoing publication is not
in excess of the rate charged private
individuals.

Signed



Subscribed and sworn to before me
this 18th day of January, 2017



Notary Public in and for
The State of Alaska.
Third Division
Anchorage, Alaska
MY COMMISSION EXPIRES

2/23/2019



PUBLIC NOTICE Municipality of Anchorage



2018-2022 Housing and Community Development Consolidated Plan's Assessment of Fair Housing Plan Notice of Public Hearing and 30 Day Public Comment Period

In order to be eligible to receive Department of Housing and Urban Development (HUD) grant funds, the Municipality must submit a **Housing and Community Development Consolidated Plan** to HUD every five years that includes an **Assessment of Fair Housing Plan**. The **Consolidated Plan** is an assessment and analysis of social and economic conditions and issues related to affordable housing, homelessness and community development. The **Assessment of Fair Housing** is to provide an assessment and planning process for taking actions to overcome patterns of segregation, promote fair housing choice, and foster inclusive housing free from discrimination.

This is the second of two public hearings for the **Assessment of Fair Housing Plan**. The draft **Assessment of Fair Housing Plan** is available at: <http://www.muni.org/Departments/health/PHIP/CSD/Pages/Default.aspx> for a 30 day public comment period starting January 18, 2017. Comments received by 4:00 P.M., February 21, 2017 will be accepted by mail, email or delivery to the following location:

Mail: Municipality of Anchorage
Department of Health and Human Services
Housing and Community Services Division
Community Safety and Development
Nancy Anderson, CSD Program Manager
PO Box 196650
Anchorage, AK 99519-6650
249-7580
Fax: 249-7580
Email: AndersonNW@muni.org
Hand Delivery: 825 L Street, Room 506

A public hearing on the plan will be held:

Wednesday, February 1, 2017, 4:00 – 5:00 p.m.
Municipality's Assembly Conference Room
632 W. 6th Avenue, 1st Floor, Room 155, Anchorage, AK

This is an opportunity for the Municipality to hear residents' views, recommendations and ask questions prior to the plan's submission to HUD.

Individuals in need of a language interpreter or with disabilities who need auxiliary aids, services, special accommodations or modifications to participate should contact Pat Monday two days before the public hearing by telephone at 343-4822 or email MondayPC@muni.org



Published: January 18, 2017



Notary Public
BRITNEY L. THOMPSON
State of Alaska
My Commission Expires Feb 23, 2019