

## V. FAIR HOUSING ANALYSIS

## A. DEMOGRAPHIC SUMMARY

**Describe demographic patterns in the service area and region, and describe trends over time (since 1990).**

### Demographic Summary

Jacksonville, Florida is home to an estimated 902,488 residents, according to the 2016-2020 American Community Survey (ACS) five-year estimates. Jacksonville is located within both Duval County and the Jacksonville Metropolitan Statistical Area (MSA), which contain an estimated 948,651 residents and 1,533,796 residents, respectively. Although the Jacksonville MSA contains five counties – Duval, St. Johns, Clay, Nassau, and Baker – the city of Jacksonville alone contains more residents than in all other cities and counties in the MSA combined. Both Jacksonville and Duval County have experienced significant growth over the past 20 years, with the city growing at a slightly faster rate than the county (22.7% and 21.6%, respectively). Growth has remained relatively consistent over this time, slowing slightly since 2010. Growth for the larger Jacksonville MSA during the same period was only 13.7%, indicating that growth within Duval County and the city of Jacksonville made up the majority of the MSA's growth.

### Demographic Profile

#### RACE AND ETHNICITY

Jacksonville's racial and ethnic demographics have shifted rapidly over the past 20 years. In 2000, non-Hispanic white residents comprised nearly two-thirds of the city's population. In 2020, the same group comprised only 50% of residents. A large increase in the Hispanic population is primarily responsible for this shift, more than tripling from 30,594 people, or 4.2% of residents, in 2000 to 94,029 people, or 10.2% of residents, in 2020. The Asian population experienced similar growth, increasing from 20,875, or 2.9% of residents, to 44,222, or 4.9% of residents. The remainder of the demographic shift is accounted for by a slight growth in the Black population, from 29.0% in 2000 to 30.9% in 2020. Duval County experienced nearly identical demographic shifts, while the larger Jacksonville MSA has significantly fewer residents of color, reporting a population that is 62.1% white, 21.0% Black, 9.3% Hispanic, and 3.8% Asian.

#### NATIONAL ORIGIN

Duval County and the city of Jacksonville report 11.4% and 11.7% foreign born residents in 2022, respectively. While data is not available for 2000, these figures are up from 9.0% and 9.2% in 2010, indicating a growing foreign-born population in the area. For both Jacksonville and Duval County, the most common countries of origin for foreign-born residents are the Philippines, India, Cuba, Mexico, and Haiti, in that order. The Jacksonville MSA reports the same top five countries of origin, but in the MSA the orders of Cuba and India are reversed. In both Jacksonville and Duval County, Filipino-born residents make up around 1.2% of residents, while

every other nationality comprises less than 1%. In the Jacksonville MSA, no single foreign-born nationality accounts for 1% or more of residents.

### **LIMITED ENGLISH PROFICIENCY (LEP)**

The tripling of the Hispanic population in both Jacksonville and Duval County is reflected in the Limited English Proficiency (LEP) data of both locations, as both the city and the county's percentage of residents who speak English less than very well have increased since 2010 (9.2 to 11.7% and 9.0 to 11.4%, respectively). The primary language spoken by households with Limited English Proficiency is Spanish, with roughly 25,000 people, or nearly 3% of residents, in both the city and county speaking primarily Spanish while also speaking English less than very well. Other languages commonly spoken in LEP households include Other Indo-European Languages, Other Asian or Pacific Islander Languages, Russian/Polish/Other Slavic Languages, and Tagalog. Primary non-English languages spoken remain consistent throughout the Jacksonville MSA.

### **DISABILITY**

Roughly 13% of residents throughout the city of Jacksonville, Duval County, and the Jacksonville MSA report at least one disability. The most common disability type is an ambulatory difficulty, ranging from 7.3 to 7.6% of residents. Independent living and cognitive difficulties are the second and third most common disabilities, comprising 5.4 to 5.7% and 5.1 to 5.4% of residents, respectively. 2.9% of residents in Jacksonville and Duval County have hearing difficulties, a slightly smaller percentage than in the larger Jacksonville MSA, where 3.3% of residents have hearing difficulties. This discrepancy is likely explained by the fact that the Florida School for the Deaf and Blind is located in St. Augustine, Florida, which is within the Jacksonville MSA but outside of Duval County. Finally, residents with vision difficulties or self-care difficulties make up roughly 2.5% each of the population in all three areas.

### **AGE**

Age distribution is similar between Jacksonville and Duval County, with roughly 23% of the population under age 18, 63% aged 18 to 64, and 14% aged 65 and older in both areas. The Jacksonville MSA has a slightly higher population of individuals over 65 at 15.8%, which is countered by a lower population aged 18 to 65. This discrepancy is likely explained by senior communities and assisted living facilities located within the MSA but outside of Duval County. Over the past 20 years, the populations of Jacksonville and Duval County have noticeably aged – in 2000, 26.7% of the population was under 18 years old, while in 2020, 22.9% of the population is under age 18. At the same time, the population aged 65+ grew from 10.3% to 13.8%. Population aging is similar in Duval County, where the share of the population under 18 went from 26.3% to 22.5% while the population aged 65+ grew from 10.5% to 14.0%. Between 2000 and 2020, median age for the city of Jacksonville and Duval County increased from 33.8 to 35.9 and from 34.1 to 36.3, respectively.

## SEX

In all three study areas – the city of Jacksonville, Duval County, and Jacksonville MSA – female residents slightly outnumber male residents. Within the city of Jacksonville, 48.4% of residents are male and 51.6% are female. This demographic has remained consistent over time and has a slightly more pronounced gap than both the U.S. national average, which is roughly 49.5% male and 50.5% female, and the Florida state average, which is roughly 48.9% male and 51.1% female.

## FAMILY TYPE

The largest single household demographic in both the city of Jacksonville and in Duval County is a householder living alone, comprising 30.4% and 30.6% of households, respectively. In the larger Jacksonville MSA, families with children (30.9%) make up a slightly larger demographic than householders living alone (27.2%). In both the city and county, the number of householders living alone has increased by around 20% in the past 20 years. Notably, the number of individuals aged 65+ living alone increasing at a faster rate of roughly 30% at the same time.

Families with children comprise 29.8% of Jacksonville households, 29.3% of Duval County households, and 30.9% of Jacksonville MSA households. This is higher than the Florida state average of 26.8%, but significantly lower than the U.S. national average of 40%. In 2000, households with children made up 33.9% of Jacksonville households and 33.3% of Duval County households, showing a similar degree of decline in both locations. Slightly over half of families with children are headed by a married couple, while around one-quarter are headed by a single mother. Around 7% of families with children are headed by an unmarried couple, and 4% are headed by a single father. In comparison to the MSA, the city of Jacksonville and Duval County have slightly lower percentages of married couples heading households with children and slightly higher percentages of single women heading households with children. Families of any type with children have decreased by around 12%, or 4 percentage points as a share of all households, since 2000, and there are fewer total households with children in both areas now than there were in 2010.

In both the city of Jacksonville and Duval County the number of families living with an individual aged 65 and older increased by roughly 31%, or around 6 percentage points as a share of all family households. As mentioned above, the number of individuals aged 65 and older living alone also increased. This reflects data showing that Jacksonville's population is trending older and may indicate a need for more supportive services for the elderly.



TABLE 2: DEMOGRAPHIC OVERVIEW

Demographic Indicator	JACKSONVILLE			DUVAL COUNTY			JACKSONVILLE MSA		
		#	%		#	%		#	%
<b>RACE / ETHNICITY</b>									
<b>Non-Hispanic or Latino</b>									
<b>White</b>		451,694	50.0%		491,340	51.8%		951,860	62.1%
<b>Black</b>		274,784	30.4%		276,288	29.1%		321,337	21.0%
<b>Asian or Pacific Islander</b>		43,770	4.8%		44,529	4.7%		58,435	3.8%
<b>Native American</b>		1,567	0.2%		1,792	0.2%		3,108	0.2%
<b>Other Race</b>		5,279	0.6%		5,461	0.6%		7,284	0.5%
<b>Two or More Races</b>		31,365	3.5%		32,498	3.4%		49,879	3.3%
<b>Hispanic or Latino</b>		94,029	10.4%		96,743	10.2%		141,893	9.3%
<b>TOTAL POPULATION</b>		<b>902,488</b>	<b>100.0%</b>		<b>948,651</b>	<b>100.0%</b>		<b>1,533,796</b>	<b>100.0%</b>
<b>NATIONAL ORIGIN</b>									
<b>#1 Country of Origin</b>	Philippines	10,832	1.20%	Philippines	10,972	1.16%	Philippines	14,309	0.93%
<b>#2 Country of Origin</b>	India	6,995	0.78%	India	7,122	0.75%	Cuba	9,105	0.59%
<b>#3 Country of Origin</b>	Cuba	6,609	0.73%	Cuba	6,654	0.70%	India	8,905	0.58%
<b>#4 Country of Origin</b>	Mexico	5,237	0.58%	Mexico	5,417	0.57%	Mexico	8,019	0.52%
<b>#5 Country of Origin</b>	Haiti	4,163	0.46%	Haiti	4,163	0.44%	Haiti	5,055	0.33%

Demographic Indicator	JACKSONVILLE			DUVAL COUNTY			JACKSONVILLE MSA		
		#	%		#	%		#	%
<b>LIMITED ENGLISH PROFICIENCY (LEP LANGUAGE)</b>									
<b>#1 LEP Language</b>	Spanish	25,159	2.79%	Spanish	25,582	2.70%	Spanish	34,437	2.25%
<b>#2 LEP Language</b>	Other Indo-European languages	4,471	0.50%	Other Indo-European languages	4,536	0.48%	Other Indo-European languages	6,348	0.41%
<b>#3 LEP Language</b>	Other AAPI languages	3,675	0.41%	Other AAPI languages	3,690	0.39%	Other AAPI languages	4,310	0.28%
<b>#4 LEP Language</b>	Russian, Polish, or other Slavic languages	3,551	0.39%	Russian, Polish, or other Slavic languages	3,560	0.38%	Russian, Polish, or other Slavic languages	4,068	0.27%
<b>#5 LEP Language</b>	Tagalog (inc. Filipino)	2,966	0.33%	Tagalog (inc. Filipino)	2,974	0.31%	Tagalog (inc. Filipino)	3,937	0.26%
<b>AGE</b>									
<b>Under 18</b>		206,050	22.8%		214,225	22.6%		343,737	22.4%
<b>18 to 64</b>		571,837	63.4%		600,937	63.3%		948,112	61.8%
<b>65+</b>		124,601	13.8%		133,489	14.1%		241,947	15.8%

Demographic Indicator	JACKSONVILLE			DUVAL COUNTY			JACKSONVILLE MSA		
		#	%		#	%		#	%
<b>DISABILITY TYPE</b>									
Hearing Difficulty		25,510	2.9%		26,903	2.9%		49,490	3.3%
Vision Difficulty		21,976	2.5%		22,783	2.5%		36,606	2.4%
Cognitive Difficulty		44,501	5.4%		45,835	5.3%		72,346	5.1%
Ambulatory Difficulty		61,920	7.6%		63,993	7.4%		103,200	7.3%
Self-Care Difficulty		20,750	2.5%		21,550	2.5%		34,160	2.4%
Independent Living Difficulty		38,258	5.7%		39,666	5.6%		62,450	5.4%
<b>TOTAL POPULATION WITH A DISABILITY</b>		<b>114,979</b>	<b>13.1%</b>		<b>119,076</b>	<b>12.9%</b>		<b>195,439</b>	<b>13.0%</b>
<b>SEX</b>									
Male		436,884	48.4%		459,920	48.5%		748,095	48.8%
Female		465,604	51.6%		488,731	51.5%		785,701	51.2%
<b>HOUSEHOLD TYPE</b>									
Families with Children		101,088	29.8%		105,340	29.3%		174,179	30.9%
Married Couple, Children		53,040	15.6%		55,637	15.5%		101,422	18.0%
Unmarried Couple, Children		7,574	2.2%		7,723	2.1%		11,380	2.0%

Demographic Indicator	JACKSONVILLE			DUVAL COUNTY			JACKSONVILLE MSA		
		#	%		#	%		#	%
<b>Female Householder, No Spouse, Children</b>		24,817	7.3%		25,816	7.2%		35,019	6.2%
<b>Male Householder, No Spouse, Children</b>		4,367	1.3%		4,514	1.3%		7,321	1.3%
<b>Married Couple, No Children</b>		86,578	25.5%		93,007	25.9%		167,853	29.8%
<b>Unmarried Couple, No Children</b>		14,639	4.3%		15,855	4.4%		22,822	4.0%
<b>Householder Living Alone</b>		103,208	30.4%		109,971	30.6%		153,167	27.2%
<b>Other</b>		44,768	13.2%		47,021	13.1%		64,962	11.5%
<b>TOTAL HOUSEHOLDS</b>		<b>338,991</b>	<b>100.00%</b>		<b>359,544</b>	<b>100.00%</b>		<b>563,946</b>	<b>100.00%</b>

*Data Sources: 2016-2020 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, C16001, S1101, S1810.*

NOTE: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total family households. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

TABLE 3: DEMOGRAPHIC TRENDS

Demographic Indicator	2000		2010		2016 to 2020	
	#	%	#	%	#	%
<b>JACKSONVILLE</b>						
<b>Race Ethnicity</b>						
<b>White, Non-Hispanic</b>	457,478	62.2%	456,250	56.2%	451,244	50.0%
<b>Black, Non-Hispanic</b>	213,514	29.0%	247,609	30.5%	278,869	30.9%
<b>Hispanic</b>	30,594	4.2%	58,452	7.2%	93,859	10.4%
<b>Asian or Pacific Islander, Non-Hispanic</b>	20,875	2.9%	34,097	4.2%	44,222	4.9%
<b>Native American, Non-Hispanic</b>	2,474	0.3%	2,436	0.3%	1,805	0.2%
<b>National Origin</b>						
<b>Foreign-Born</b>	N/A	N/A	74,806	9.2%	105,434	11.7%
<b>Limited English Proficiency</b>						
<b>Limited English Proficiency</b>	N/A	N/A	41,403	5.1%	55,052	6.1%
<b>Age</b>						
<b>Under 18</b>	196,339	26.7%	198,087	24.4%	206,670	22.9%
<b>18 to 64</b>	463,363	63.0%	528,503	65.1%	571,275	63.3%
<b>65+</b>	75,915	10.3%	86,054	10.6%	124,543	13.8%
<b>Sex</b>						
<b>Male</b>	356,284	48.4%	393,739	48.5%	436,804	48.4%
<b>Female</b>	379,333	51.6%	418,094	51.5%	465,684	51.6%
<b>Family Type</b>						
<b>Families with Children</b>	96,400	33.9%	102,500	33.0%	101,285	29.0%
<b>Individuals Living Alone</b>	74,480	26.2%	92,445	29.7%	110,494	31.6%
<b>Households with Member Aged 65+</b>	55,814	19.6%	62,247	20.0%	89,817	25.7%
<b>Aged 65+ Living Alone</b>	22,031	7.7%	24,526	7.9%	34,924	10.0%
<b>TOTAL POPULATION</b>	735,617	100%	821,784	100%	902,488	100%

Demographic Indicator	2000		2010		2016 to 2020	
	#	%	#	%	#	%
<b>DUVAL COUNTY</b>						
<b>Race / Ethnicity</b>						
<b>White, Non-Hispanic</b>	494,747	63.5%	491,538	57.5%	491,401	51.8%
<b>Black, Non-Hispanic</b>	216,780	27.8%	250,479	29.3%	279,852	29.5%
<b>Hispanic</b>	31,946	4.1%	59,839	7.0%	66,162	10.2%
<b>Asian or Pacific Islander, Non-Hispanic</b>	21,603	2.8%	35,049	4.1%	45,535	4.8%
<b>Native American, Non-Hispanic</b>	2,598	0.3%	2,565	0.3%	1,897	0.2%
<b>National Origin</b>						
<b>Foreign-Born</b>	N/A	N/A	76,905	9.0%	108,012	11.4%
<b>Limited English Proficiency</b>						
<b>Limited English Proficiency</b>	N/A	N/A	42,742	5.0%	55,022	5.8%
<b>Age</b>						
<b>Under 18</b>	204,991	26.3%	206,018	24.1%	213,446	22.5%
<b>18 to 64</b>	492,135	63.2%	557,361	65.2%	602,393	63.5%
<b>65+</b>	81,753	10.5%	91,468	10.7%	132,811	14.0%
<b>Sex</b>						
<b>Male</b>	377,781	48.5%	414,601	48.5%	460,096	48.5%
<b>Female</b>	401,098	51.5%	440,247	51.5%	488,555	51.5%
<b>Family Type</b>						
<b>Families with Children</b>	101,113	33.3%	107,036	32.4%	105,814	28.6%
<b>Individuals Living Alone</b>	80,527	26.5%	99,413	30.1%	117,435	31.7%
<b>Households with Member Aged 65+</b>	60,016	19.8%	67,009	20.3%	9,6147	26.0%
<b>Aged 65+ Living Alone</b>	23,786	7.8%	26,700	8.1%	37,422	10.1%
<b>TOTAL POPULATION</b>	779,925	100%	864,263	100%	948,651	100%

Data Sources: U.S. Census 2000 table DP-1, ACS 2006-2010 tables DP-02 and S0501, ACS 2016-2020 tables DP-02 and S0501.

NOTE: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total family households

## B. GENERAL ISSUES

### Segregation / Integration

#### ANALYSIS

- i. **Describe and compare segregation levels in the service area and region. Identify the racial/ethnic groups that experience the highest levels of segregation.**

From 2000 to 2020, the share of Jacksonville's population that identifies as non-Hispanic white declined from 62.2% to 50.0% of the total population, corresponding with rapid growth of the city's Hispanic population and some growth of the Black population (see Table 3). While increases in racial and ethnic diversity reduced residential segregation levels, segregation of Black and white residents has persisted at a moderate level.

To measure levels of racial and ethnic segregation,<sup>4</sup> HUD uses a dissimilarity index (DI), which indicates the degree to which racial and ethnic groups are evenly geographically distributed. Segregation is minimized when all small areas (census tracts, in this analysis) have the same proportions of racial and ethnic groups. Segregation is highest among racial and ethnic groups when no members of two groups occupy a common census tract.

DI values range from 0 (complete integration) to 100 (complete segregation). HUD identifies DI values below 40 as low segregation, values between 40 and 54 as moderate, and values of 55 or above as high segregation. According to this metric, there was moderate segregation among Black and white residents in Duval County (DI value of 48.5) and high segregation among Black and white residents in the Jacksonville region (DI value of 52.1) in 2010, the most recent year for which HUD data is available. Other racial and ethnic group pairings had low levels of segregation: the overall white/non-white DI value was 37.2, the white/Asian or Pacific Islander DI value was 30.9, and the white/Hispanic DI value was 23.6.

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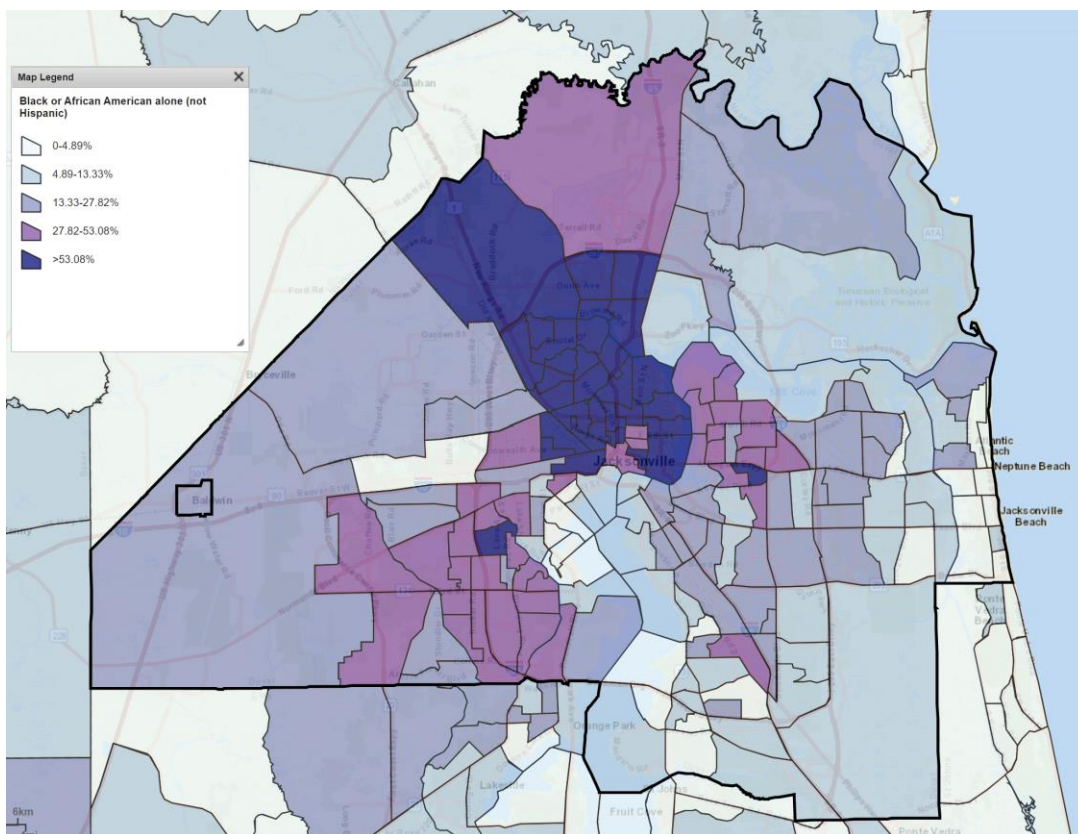
<sup>4</sup> In examining patterns of residential segregation within Jacksonville, it is important to note that many residents of minority racial, ethnic, religious, or linguistic backgrounds may choose to cluster in neighborhoods known as ethnic enclaves, which can play a vital role in a city's vibrancy and culture. However, the defining factor in delineating whether a neighborhood is a thriving ethnic enclave or an area of concerning segregation is whether residents have housing choices. Thus, in this section, patterns of segregation are discussed with a focus on identifying and removing factors that force residents into residential clustering, rather than on evenly integrating a city without regard to historic community culture.

- ii. **Identify areas in the service area 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.**

#### SEGREGATION BY RACE AND ETHNICITY

Although Jacksonville is a racially and ethnically diverse city, the demographic composition of the city is uneven across neighborhoods. Black residents more heavily populate the central urban core of Jacksonville and, to a lesser extent, the wider portion of Jacksonville located west of the St. John's River, also known as the Northwest Corridor (see Figure 8). White residents more heavily populate the quadrant of Jacksonville located both south and east of the river, with Hispanic residents more heavily present in southern parts of the city. Notably, Black residents are the primary racial group in all of the county's racially and ethnically concentrated areas of poverty, as discussed further in the following section. Dissimilarity Index values also indicate that Black residents experience higher levels of residential segregation than other racial or ethnic groups in the area. The following images depict clustering of Black and Hispanic residents by census tract in 2020:

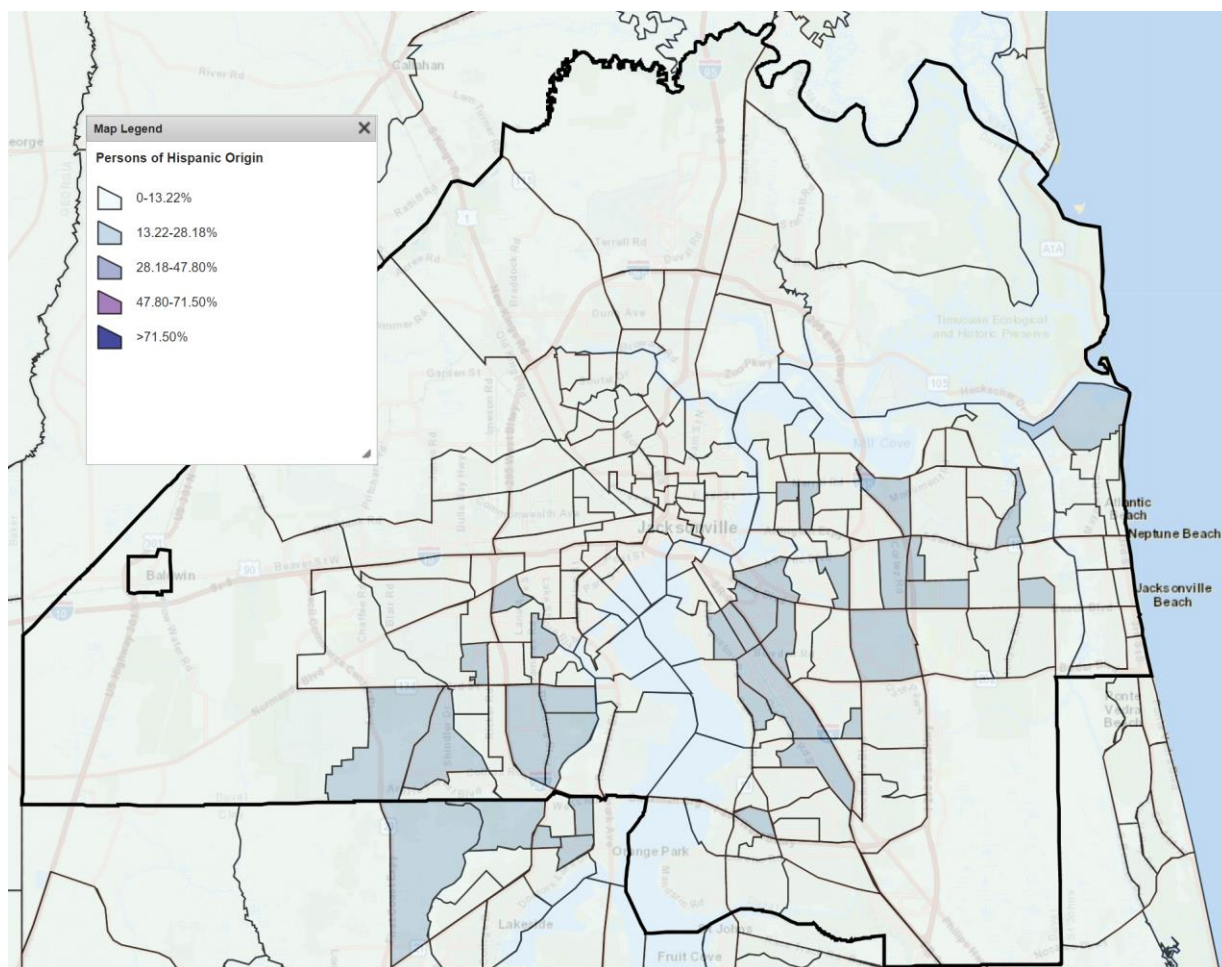
FIGURE 8: BLACK RESIDENTS BY CENSUS TRACT, DUVAL COUNTY, 2020



Source: HUD CPD maps, 2020



FIGURE 9: HISPANIC RESIDENTS BY CENSUS TRACT, DUVAL COUNTY, 2020



Source: HUD CPD maps, 2020

## SEGREGATION BY NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.<sup>5</sup> Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides

<sup>5</sup> James, F., Romine, J., & Zwanig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.<sup>6</sup>

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language; however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.<sup>7</sup> Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.<sup>8</sup>

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

In Jacksonville and Duval County, foreign-born residents and residents with limited English proficiency experience less geographic clustering than residents of specific races and ethnicities; however, both groups are still more heavily present in the southern and southeastern parts of Jacksonville. In particular, LEP speakers of Spanish and other Indo-European languages are clustered in south and east Jacksonville. Foreign-born residents from India are clustered in southeast Jacksonville, and foreign-born residents from the Philippines are clustered in south Jacksonville (see Figure 10 and Figure 11).

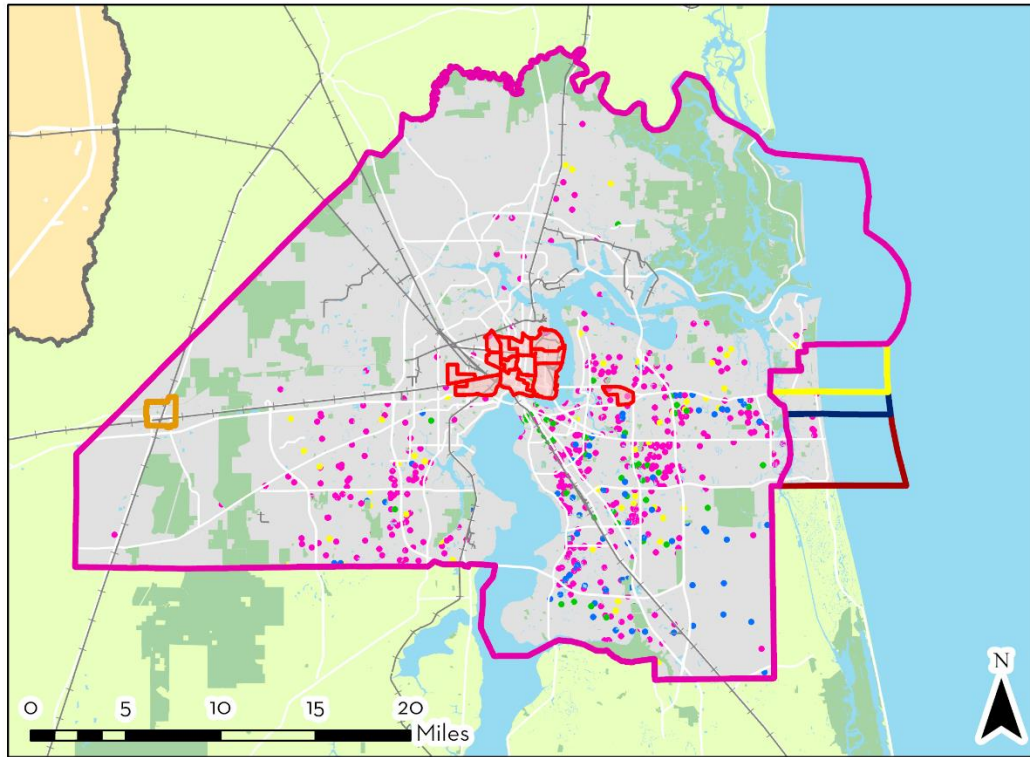
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<sup>6</sup> Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

<sup>7</sup> Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" **Migration Information Source**. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

<sup>8</sup> Golding, E., Goodman, L., & Storchack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership?" Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

FIGURE 10: LEP RESIDENTS IN DUVAL COUNTY, 2016-2020



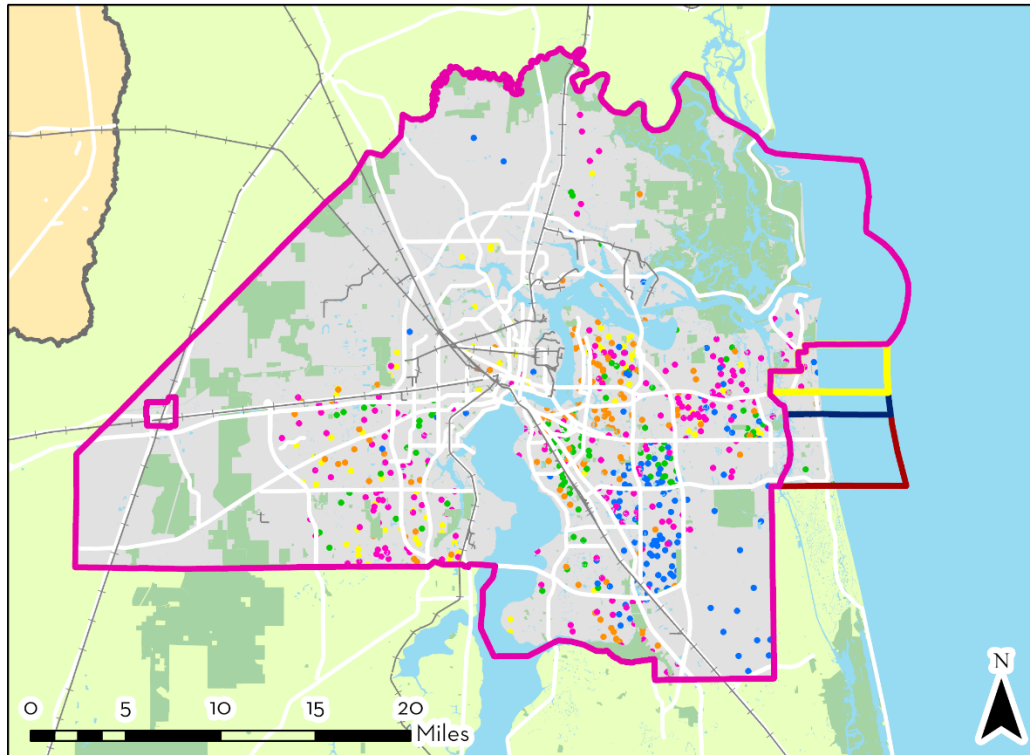
Source: 2016-2020 5-Year ACS Table C16001

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

**Limited English Proficiency (LEP) Population  
(Top 5 Most Spoken Languages)**  
1 Dot = 50 People

- Spanish
- Other Indo-European languages
- Other AAPI languages
- Russian, Polish, or other Slavic languages
- Tagalog (inc. Filipino)

FIGURE 11: FOREIGN-BORN RESIDENTS, DUVAL COUNTY, 2016-2020



Source: 2016-2020 5-Year ACS Table B05006

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

**National Origin of Foreign-Born Population  
(Top 5 Most Populous)**

**1 Dot = 50 People**

- Philippines
- India
- Cuba
- Mexico
- Haiti

**iii. Explain how these segregation levels and patterns in the service area and region have changed over time (since 1990).**

Segregation of non-white and white populations in Jacksonville and Duval County has declined over time, from a moderate level in 1990 (51.0) to a low level in 2010 (37.2). Segregation of Black and white residents declined from a high level in 1990 (60.0) to a moderate level in 2010 (48.5). During the same time period, segregation of Hispanic and white residents and of Asian or Pacific Islander and white residents remained low but increased slightly (19.7 to 23.6, and 30.0 to 30.9, respectively; see Table 4).

**TABLE 4: DISSIMILARITY INDEX (DI) VALUES, JACKSONVILLE-DUVAL COUNTY JURISDICTION**

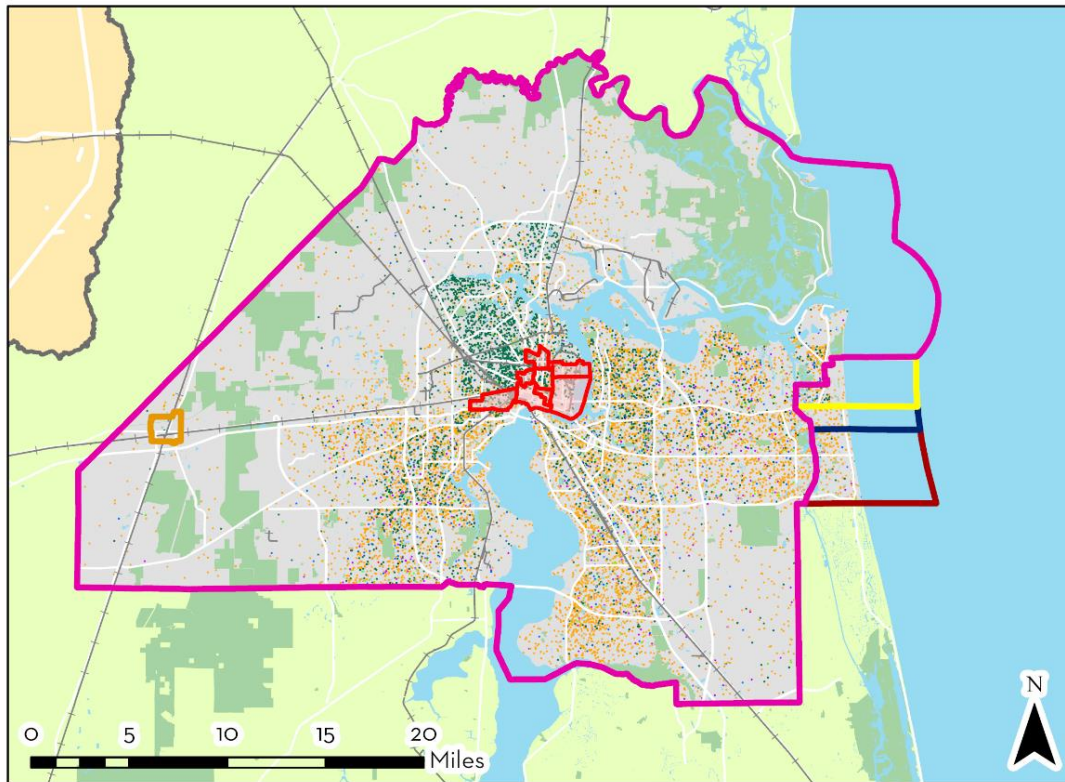
DI Value	1990	2000	2010
Non-White/White	51.0	41.8	37.2
Black/ White	60.0	50.8	48.5
Hispanic/ White	19.7	23.0	23.6
Asian or Pacific Islander/ White	30.0	30.5	30.9

*Source: HUD AFFH Mapping Tool. (Data available for 1990, 2000, and 2010 only).*

While HUD does not currently provide DI data for later years, the maps in Figure 12 through Figure 14 illustrate patterns of segregation and integration by race and ethnicity in Duval County through 2020. While segregation has declined during this time period, moderate levels of segregation among Black and white residents continue to be visible, with Black residents clustered in the urban core and west Duval County and white residents in the eastern and southern portions of the county.



FIGURE 12: POPULATION BY RACE AND ETHNICITY, DUVAL COUNTY, 2000



Source: 2000 Decennial Census; 2000 HUD Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)\*

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water

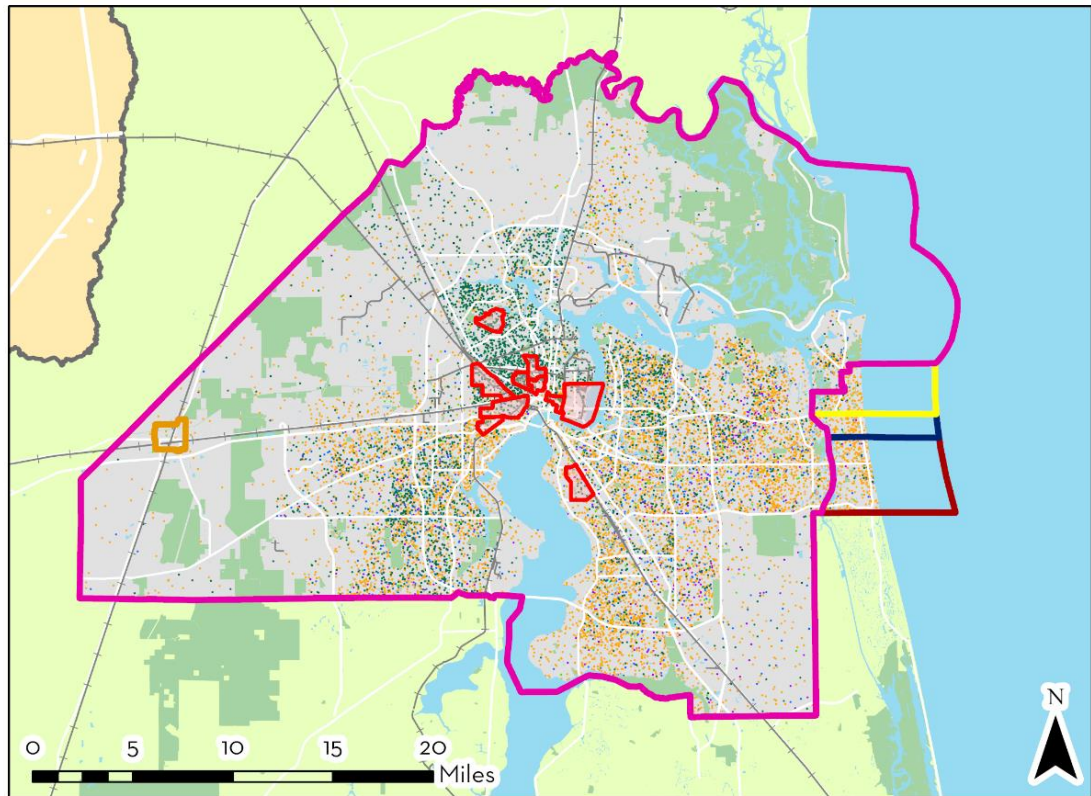
### Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

\*The U.S. Department of Housing and Urban Development (HUD) defines a racially or ethnically concentrated area of poverty (R/ECAP) as an area that has a majority Non-White population and a poverty rate that is either above 40 percent or three times the regional average.

FIGURE 13: POPULATION BY RACE AND ETHNICITY, DUVAL COUNTY, 2010



Source: 2010 Decennial Census; 2010 HUD Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)\*

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water

### Race + Ethnicity

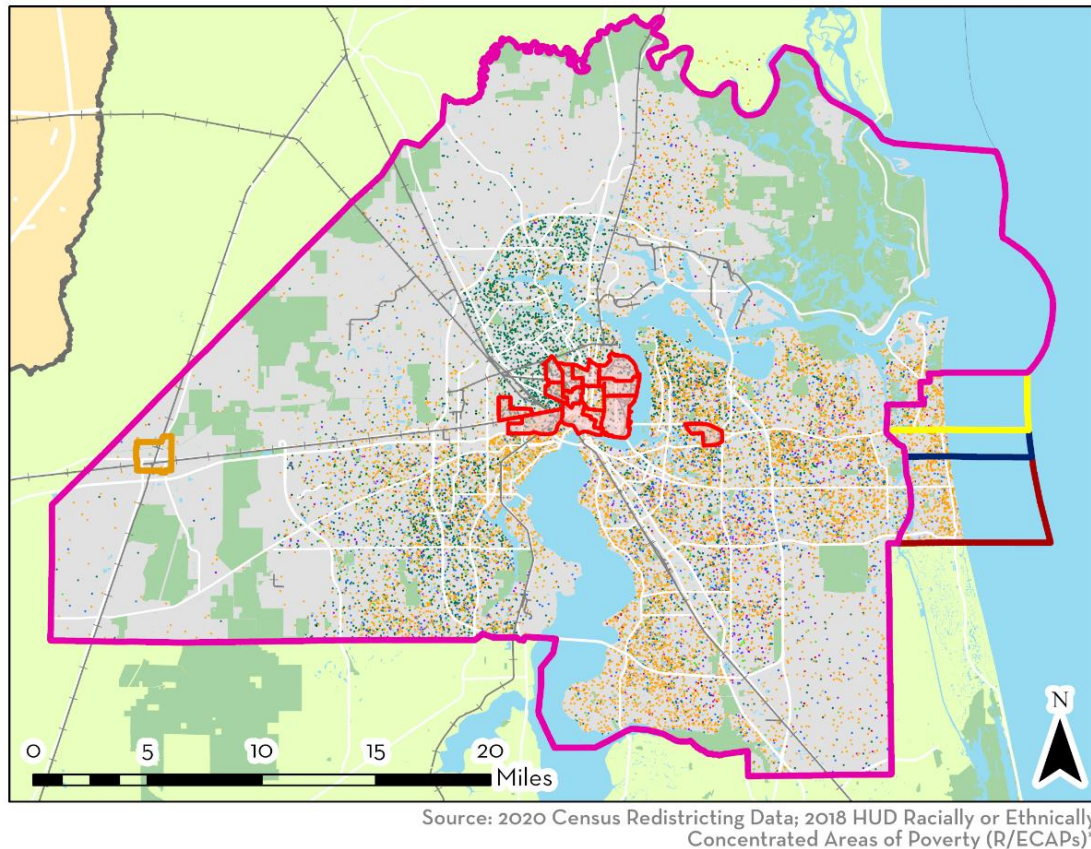
1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

\*The U.S. Department of Housing and Urban Development (HUD) defines a racially or ethnically concentrated area of poverty (R/ECAP) as an area that has a majority Non-White population and a poverty rate that is either above 40 percent or three times the regional average.



FIGURE 14: POPULATION BY RACE AND ETHNICITY, DUVAL COUNTY, 2020



- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water

### Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

\*The U.S. Department of Housing and Urban Development (HUD) defines a racially or ethnically concentrated area of poverty (R/ECAP) as an area that has a majority Non-White population and a poverty rate that is either above 40 percent or three times the regional average.



**iv. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the service area in the future. Participants should focus on patterns that affect the service area and region rather than creating an inventory of local laws, policies, or practices.**

Overall, stakeholders interviewed emphasized the importance of both public and private funding for historically disenfranchised neighborhoods and, secondarily, of protective policy enforcement in ending residential segregation stemming from a lack of housing choice. Stakeholders noted the following current practices contributing to ongoing disinvestment and a related pattern of segregation based in lack of housing choice:

- Appraisal bias: the undervaluing of homes located in neighborhoods with primarily non-white residents;
- Housing affordability: the median household income of residents of previously redlined neighborhoods (see Figure 15) is roughly 25% of that of households located in historically desirable areas, preventing such residents from relocating to areas of opportunity;
- Income discrimination: landlords in higher desirability neighborhoods may refuse to rent to tenants who report voucher income;
- Lack of transit options: low-income residents are less likely to own or have access to a vehicle than higher-income residents and therefore face housing choices limited to neighborhoods with transit access in order to maintain employment;
- Infrastructure disinvestment: stakeholders noted that many historically Black neighborhoods not only lack solid infrastructure such as well-maintained roads, and sidewalks, but also exist in flood prone areas without receiving suitable funding and assistance to address issues relating to this; and
- Landlord and property management behaviors in regard to home maintenance: stakeholders noted that struggling residents frequently do not possess the time and resources to enforce their own rights in regard to safe and well maintained housing, creating opportunity for landlords to allow properties to fall into disrepair with no consequences. Stakeholders also stated a need for education and transparency on the reporting and complaint process, noting that residents who do file complaints may not know how to follow up on them.

A lack of change in current policies and funding patterns related to these issues will likely contribute to continued patterns of residential segregation in Jacksonville in the future.

#### ADDITIONAL INFORMATION

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the service area and region affecting groups with other protected characteristics.
- ii. The PHA may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

N/A

#### CONTRIBUTING FACTORS OF SEGREGATION

*Consider the listed factors and any other factors affecting the service area and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

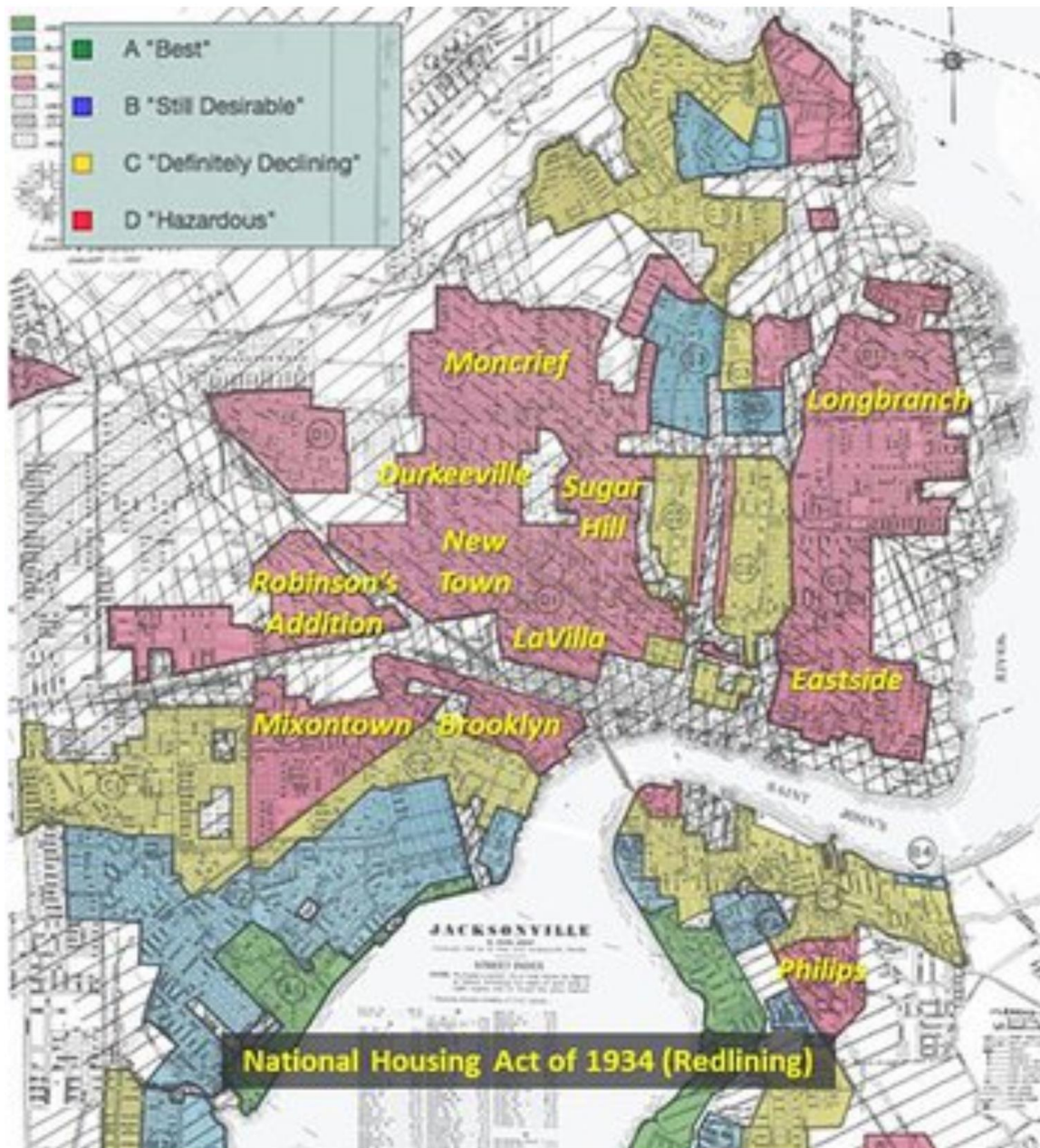
- i. Admissions and occupancy policies and procedures including preferences in publicly supported housing.
- ii. Community opposition.
- iii. Displacement of residents due to economic pressures.
- iv. Lack of community revitalization strategies.
- v. Lack of local or regional cooperation.
- vi. Lack of public and/or private investment in specific neighborhoods, including services or amenities.
- vii. Land use and zoning laws.
- viii. Location and type of affordable housing.
- ix. Loss of affordable housing.
- x. Occupancy codes and restrictions.
- xi. Policies related to payment standards, FMR, and rent subsidies.
- xii. Source of income discrimination.
- xiii. Other.

Stakeholders in Jacksonville consistently noted past redlining as a primary reason for current patterns of residential segregation within the city. Redlining was a historical practice in which banks and financial institutions refused to extend loans for properties within “undesirable” or “hazardous” neighborhoods, which almost exclusively translated to neighborhoods with primarily Black residents. This practice began in the U.S. in the 1930s and was in theory legally ended by the Fair Housing Act of 1968, which prohibits discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, (and as amended) sex, disability, and family status. However, unofficial discriminatory lending and renting has continued to a lesser degree. Perhaps more importantly, historically redlined areas still suffer from declining infrastructure and a lack of resources and services due to a consistent lack of investment and funding. Patterns of historic redlining in Jacksonville (see Figure 15) correspond to current day patterns of segregation and areas designated as R/ECAPs, or Racially/Ethnically Concentrated Areas of Poverty (see Figure 16). Areas previously deemed “hazardous” today contain a population that is roughly 85% Black, and the median household income in these areas is roughly 25% of that of families in areas of Jacksonville previously deemed “desirable”<sup>9</sup>.

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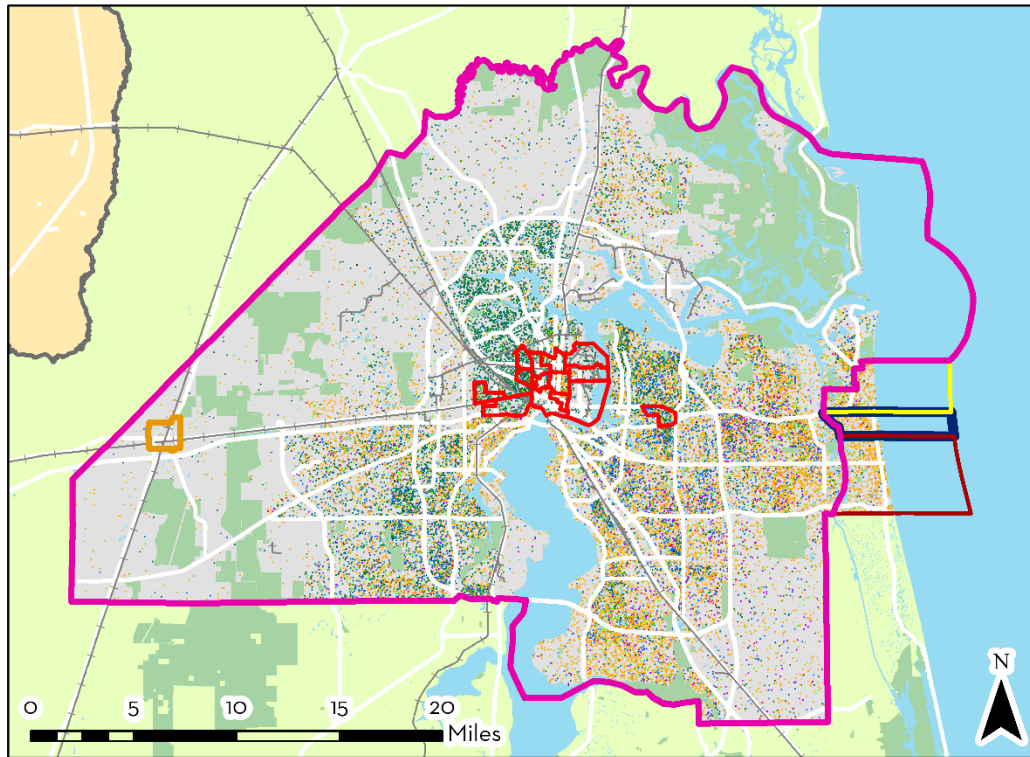
<sup>9</sup> Local Initiatives Support Corporation (LISC) Jacksonville. (2021). Understanding the Demographics Behind Redlining. Retrieved from: <https://www.lisc.org/jacksonville/regional-stories/understanding-demographics-behind-redlining/>

FIGURE 15: REDLINING BY DISTRICT IN 1934 JACKSONVILLE



Source: Local Initiatives Support Corporation of Jacksonville via Modern Cities

FIGURE 16: RESIDENTIAL SEGREGATION PATTERNS, JACKSONVILLE AND DUVAL COUNTY, 2020



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

- Duval County
- Florida
- Georgia

- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic



Zoning and development decisions in Jacksonville's history also contribute to current segregation. A series of City policies spanning the 1930s through 1970s shaped historically Black neighborhoods in ways that are still rippling through their communities. These included zoning that allowed heavy industrial next to Black residential areas, the construction of highways requiring the demolition of historically Black neighborhoods, displacement due to forced integration and urban renewal policies, and the closing of area schools. Land use and zoning continue to impact housing affordability and accessibility in Jacksonville today and are discussed in the Disproportionate Housing Needs chapter.

As detailed previously, additional factors that contribute to segregation include:

- Appraisal bias: the undervaluing of homes located in neighborhoods with primarily non-white residents;
- Housing affordability: the median household income of residents of previously redlined neighborhoods (see Figure 15) is roughly 25% of that of households located in historically desirable areas, preventing such residents from relocating to areas of opportunity;
- Income discrimination: landlords in higher desirability neighborhoods may refuse to rent to tenants who report voucher income;
- Lack of transit options: low-income residents are less likely to own or have access to a vehicle than higher-income residents and therefore face housing choices limited to neighborhoods with transit access in order to maintain employment;
- Infrastructure disinvestment: stakeholders noted that many historically Black neighborhoods not only lack solid infrastructure such as well-maintained roads, and sidewalks, but also exist in flood prone areas without receiving suitable funding and assistance to address issues relating to this; and
- Landlord and property management behaviors in regard to home maintenance: stakeholders noted that struggling residents frequently do not possess the time and resources to enforce their own rights in regard to safe and well maintained housing, creating opportunity for landlords to allow properties to fall into disrepair with no consequences. Stakeholders also stated a need for education and transparency on the reporting and complaint process, noting that residents who do file complaints may not know how to follow up on them.

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

### ANALYSIS

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.<sup>10</sup> Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of R/ECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact R/ECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. Poverty is concentrated within the largest metro areas, but suburban regions have experienced the fastest growth in poverty.<sup>11</sup>

#### **i. Identify any R/ECAPs or groupings of R/ECAP tracts within the service area and region.**

As of the 2016-2020 American Community Survey, 14 census tracts in the county had poverty rates above 36.9% (more than three times the poverty rate in the metro area of 12.3%). 13 of those 14 tracts fit the U.S. Department of Housing and Urban Development's definition of racially or ethnically concentrated areas of poverty (R/ECAPs), defined as census tracts in which 1) more than half of the population is non-white and 2) 40% or more of the population is in poverty, or the poverty rate is greater than three times the average poverty rate in the area,

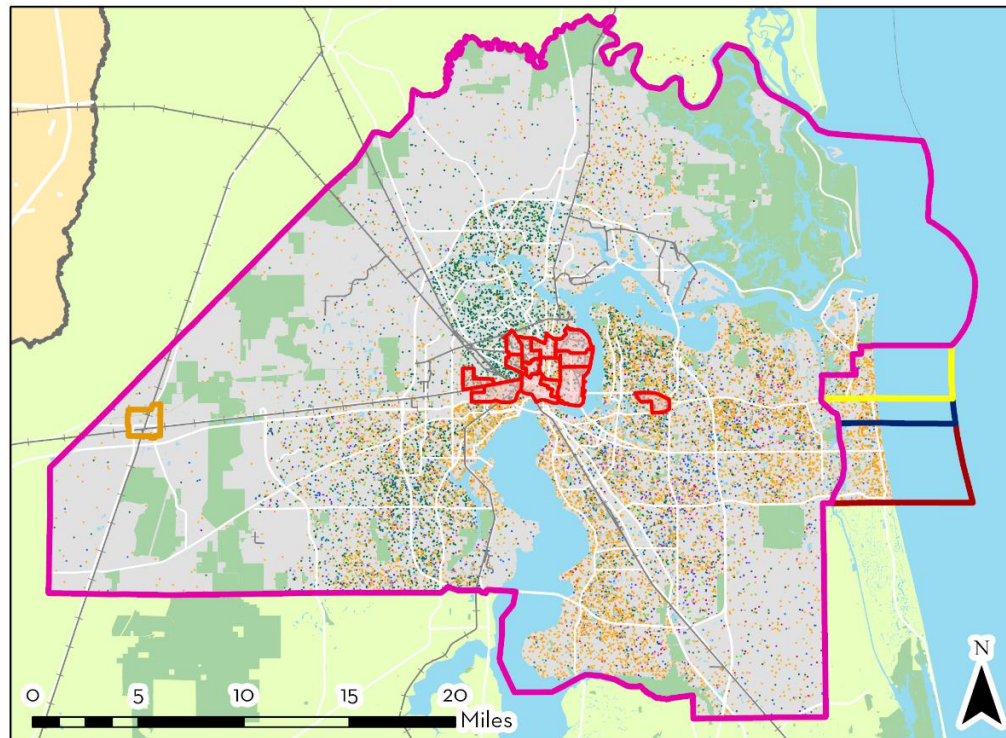
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<sup>10</sup> United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, [https://aspe.hhs.gov/system/files/pdf/40651/rb\\_concentratedpoverty.pdf](https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf).

<sup>11</sup> Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." The Brookings Institution, 29 July 2016, [www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/](http://www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/).

whichever is lower. Twelve tracts are noticeably clustered in Jacksonville's central urban core, with one tract lying slightly to the east across the St. John's River (see Figure 17).

FIGURE 17: RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY, DUVAL COUNTY, 2020



Source: 2020 Census Redistricting Data; 2018 HUD Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)\*

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water

### Race + Ethnicity

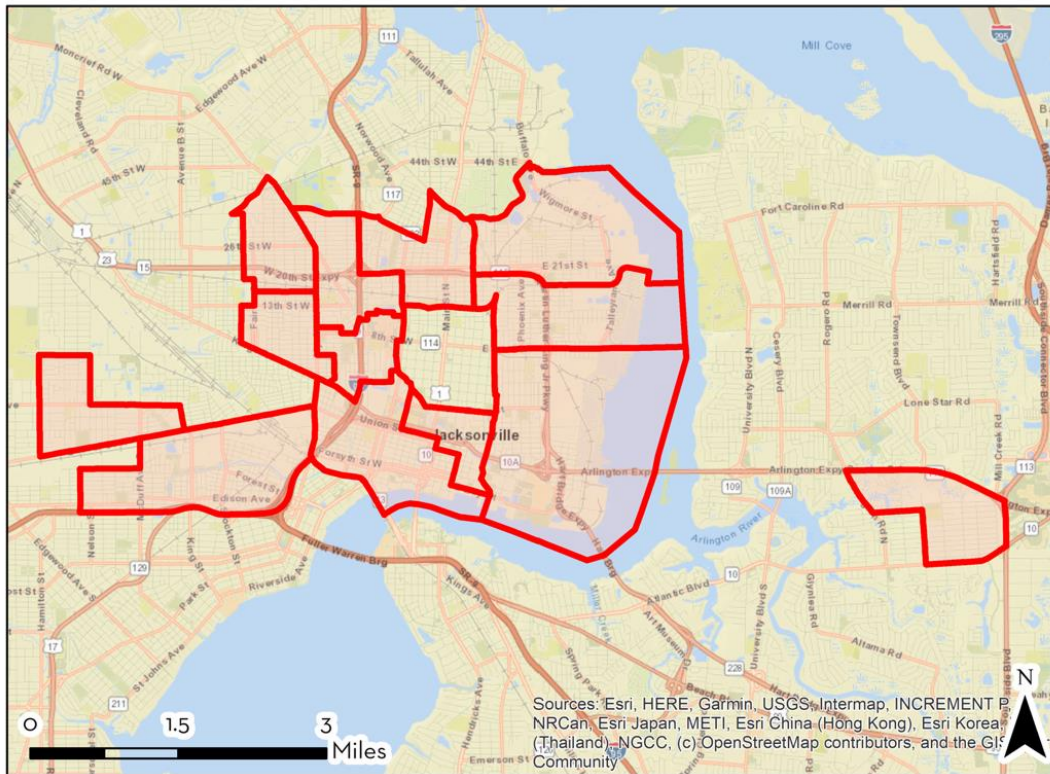
1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
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- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

\*The U.S. Department of Housing and Urban Development (HUD) defines a racially or ethnically concentrated area of poverty (R/ECAP) as an area that has a majority Non-White population and a poverty rate that is either above 40 percent or three times the regional average.



FIGURE 18: R/ECAP CENSUS TRACTS IN JACKSONVILLE, 2020



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates

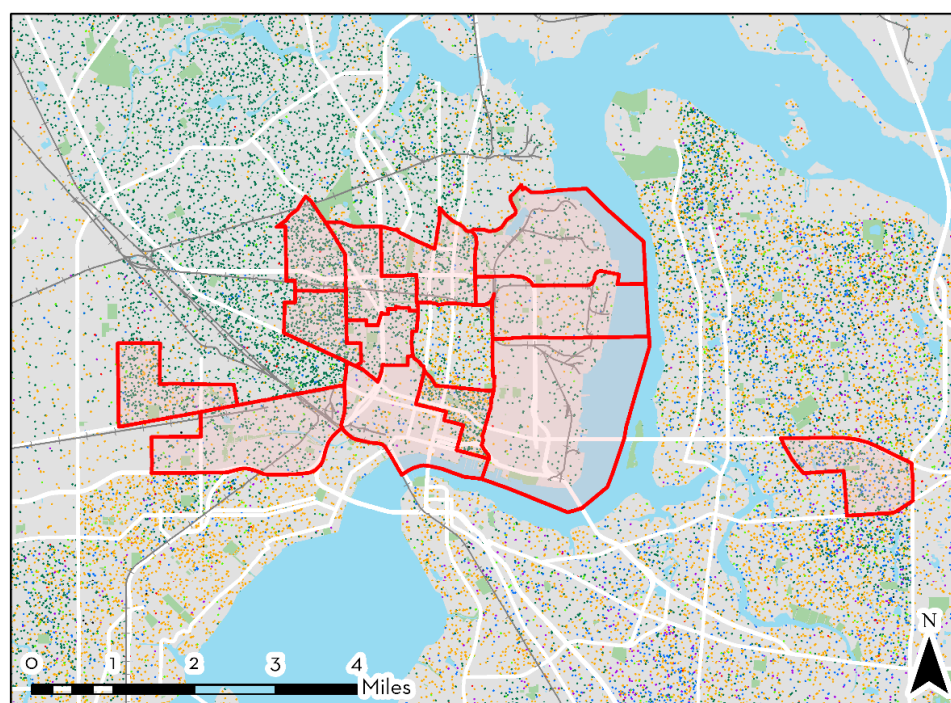
**ii. Describe and identify the predominant protected classes residing in R/ECAPs in the service area and region. How do these demographics of the R/ECAPs compare with the demographics of the service area?**

Although Jacksonville is a racially and ethnically diverse city, the demographic composition of neighborhoods is uneven throughout the jurisdiction. Black residents more heavily populate the central urban core of Jacksonville and, to a lesser extent, the wider portion of Jacksonville located west of the St. John's River. White residents more heavily populate the areas of Jacksonville located both south and east of the river, with Hispanic residents more heavily present in southern parts of the city (see Figure 16).

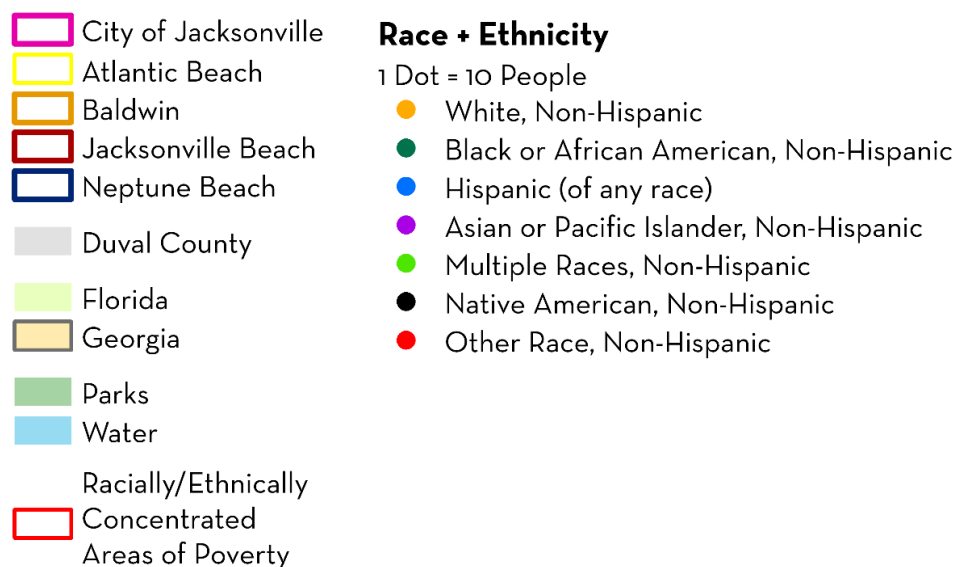
Notably, Black residents tend to make up the majority of residents in R/ECAP census tracts, comprising over 50% of all residents in every R/ECAP tract but one: note the overlap between R/ECAP tracts and predominantly Black neighborhoods in Figure 8 and Figure 19. Seven of the 13 R/ECAP tracts have populations that are more than 85% Black or African American, while Black residents make up just 29.1% of residents in Duval County as a whole, indicating disparities in access to low-poverty neighborhoods by race and ethnicity. Regional maps of poverty levels

by national origin and family status do not indicate disparities among those protected classes. Census tracts with the lowest poverty levels are clustered in east and south Duval County and tend to have greater shares of white residents.

FIGURE 19: POPULATION BY RACE AND ETHNICITY IN R/ECAP CENSUS TRACTS, 2020



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates



- iii. Describe how R/ECAPs have changed over time in the service area and region since 1990).**

At the time of the 2000 census, there were seven R/ECAP tracts in Jacksonville. By 2010, this had increased to 10 tracts and in 2020, Jacksonville had 13 R/ECAP tracts. There is a noticeable decline in clustering intensity of racially homogenous neighborhoods from 2000 to 2020, as depicted by the race and ethnicity dot maps. It is also notable that in 2010, one R/ECAP tract was a predominantly Hispanic neighborhood, seen in the southern portion of Figure 13. Finally, the R/ECAPs of 2020 are more geographically similar to the R/ECAPs of 2000 than those of 2010. In 2010, R/ECAP tracts were less geographically clustered than they were in 2000, but by 2020 they were once again clustered in the urban core.

#### **ADDITIONAL INFORMATION**

- i. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the service area and region affecting groups with other protected characteristics.**
- ii. The PHA may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.**

#### **CONTRIBUTING FACTORS OF R/ECAPS**

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

- i. Community opposition.**
- ii. Deteriorated and abandoned properties.**
- iii. Displacement of residents due to economic pressures.**
- iv. Lack of community revitalization strategies.**
- v. Lack of local or regional cooperation.**
- vi. Lack of public and/or private investment in specific neighborhoods, including services or amenities.**
- vii. Land use and zoning laws.**
- viii. Location and type of affordable housing.**

- ix. Loss of affordable housing.**
- x. Occupancy codes and restrictions.**
- xi. Policies related to payment standards, FMR, and rent subsidies.**
- xii. Private discrimination and/or lack of fair housing laws.**
- xiii. Source of income discrimination.**
- xiv. Other.**

Factors contributing to racially and ethnically concentrated areas of poverty are often the same factors contributing to high levels of residential segregation in general. In the previous section, these factors were identified as the following:

- Historic redlining preventing the flow of funds to historically Black neighborhoods from the 1930s through the current day;
- Historically discriminatory zoning practices, which allowed heavy industry directly adjacent to Black residential neighborhoods;
- Displacement from forced desegregation, from the destruction of structures in historically Black neighborhoods through the use of urban renewal policies, and from the construction of highways through the center of historically Black neighborhoods;
- Appraisal bias: the undervaluing of homes located in neighborhoods with primarily non-white residents;
- Housing affordability: the median household income of residents of previously redlined neighborhoods is roughly 25% of that of households located in historically desirable areas, preventing such residents from relocating to areas of opportunity;
- Income discrimination: landlords in higher desirability neighborhoods may refuse to rent to tenants who report voucher income;
- Lack of transit options: low-income residents are less likely to own or have access to a vehicle than higher-income residents and therefore face housing choices limited to neighborhoods with transit access in order to maintain employment;
- Infrastructure disinvestment: stakeholders noted that many historically Black neighborhoods not only lack solid infrastructure such as well-maintained roads, and sidewalks, but also exist in flood prone areas without receiving suitable funding and assistance to address issues relating to this; and
- Landlord and property management behaviors in regard to home maintenance: stakeholders noted that struggling residents frequently do not possess the time and resources to enforce their own rights in regard to safe and well-maintained housing,

creating opportunity for landlords to allow properties to fall into disrepair with no consequences. Stakeholders also stated a need for education and transparency on the reporting and complaint process, noting that residents who do file complaints may not know how to follow up on them.

## Disparities in Access to Opportunity

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate to lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections access to opportunity in Jacksonville, including access to education, employment and workforce development, transportation, low-poverty neighborhoods, and environmental quality.

### ANALYSIS

#### Education

- xv. For the protected class groups HUD has provided data, are there any disparities in access to proficient schools for protected class groups based on where they live in the service area and region? Describe how the disparities in access to proficient schools relate to residential living patterns in the service area and region.**

High-quality public schools that support students are vital community resource that can improve academic, behavioral, and social-emotional outcomes for students,<sup>12</sup> as well as lead to additional opportunities, such as higher education, employment, and increased civic engagement. Public schools in Jacksonville and Duval County fall within the Duval County Public Schools district, which served 128,948 students through public and charter schools during

<sup>12</sup> Maier, Daniel, Oakes, and Lam. (2017). Community Schools as an Effective School Improvement Strategy: A Review of the Evidence. Learning Policy Institute and National Education Policy Center.



the 2021-2022 school year.<sup>13</sup> While most students were enrolled in elementary, middle, and high schools, others participated in K-8 schools, 6-12 schools, virtual learning, charter schools, exceptional centers, and alternative schools (see Table 5).

**TABLE 5: NUMBER OF STUDENTS BY SCHOOL TYPE, DUVAL COUNTY PUBLIC SCHOOLS DISTRICT**

SCHOOL TYPE	# OF STUDENTS
Elementary	49,127
K-8	1,893
6-12	2,454
Middle	20,857
High	30,120
Virtual	1,431
Charter Schools	19,287
Exceptional Centers	895
Alternative Schools	1,101

*Source: Duval County Public Schools, 2021*

Performance varies by school, and schools in the district vary significantly in their demographics, including race, ethnicity, and the percentages of students who are economically disadvantaged, have limited English proficiency, have disabilities, and are homeless (see Table 6).

The percentage of students who are white— an indicator of racial segregation among schools— ranges from 4.1% at Matthew Gilbert Middle to 63.6% at Duncan Fletcher Middle. The lowest performing schools also tend to have lower proportions of white students, indicating some segregation by race and ethnicity.

Shares of economically disadvantaged students<sup>14</sup> vary widely among middle schools in the district, ranging from 16.8% at the Julia Landon College Preparatory and Leadership Development School to 100% at 12 of 30 public schools that serve middle school students. Notably, middle schools with smaller shares of economically disadvantaged students tend to have the highest school grades, indicating disparities in school district performance by socioeconomic status.

<sup>13</sup> Florida Department of Education. (2021-2022). Student Enrollments. Retrieved from: <https://edudata.fldoe.org/AdvancedReports.html>

<sup>14</sup> Economically disadvantaged calculations reflect the United States Department of Agriculture (USDA) multiplier for eligible Community Eligibility Provision (CEP) schools (Florida Department of Education, 2022).

Shares of students who are English Language Learners also vary widely among middle schools in the district. Among schools that reported data on English proficiency, the proportions of English Language Learners ranged from 1.3% in Baldwin Middle-Senior High School to 28.2% at Southside Middle, indicating some segregation of students in the district by English proficiency.

Students with disabilities make up 4.2% to 29.5% among middle schools that reported data on disability, with the exception of GRASP Academy, a program designed to address the needs of students who fit the dyslexia profile,<sup>15</sup> at which 76.6% of students have a disability. The five middle schools with the lowest shares of students with disabilities (12% or fewer) have shares of economically disadvantaged students ranging from 16.8% to 66.8%. Of the 12 middle schools with the highest disability rates (20% to 30%), seven have 100% shares of economically disadvantaged students, indicating higher disability rates in schools with greater shares of economically disadvantaged students.

Students experiencing homelessness make up 0.3% to 4.8% of all students among middle schools that reported data on homelessness. The seven middle schools with the highest rates of homelessness among students (2.5% to 4.8%) all have school grades of C or D, highlighting the impact of homelessness and poverty on student outcomes.

FIGURE 20: CENTRAL RIVERSIDE ELEMENTARY SCHOOL, RIVERSIDE/AVONDALE HISTORIC DISTRICT



<sup>15</sup> Duval County Public Schools. (n.d.). GRASP Academy. Retrieved from: <https://dcps.duvalschools.org/domain/6502>



TABLE 6: SCHOOL DEMOGRAPHICS AND PERFORMANCE, DUVAL COUNTY MIDDLE SCHOOLS, 2021 TO 2022

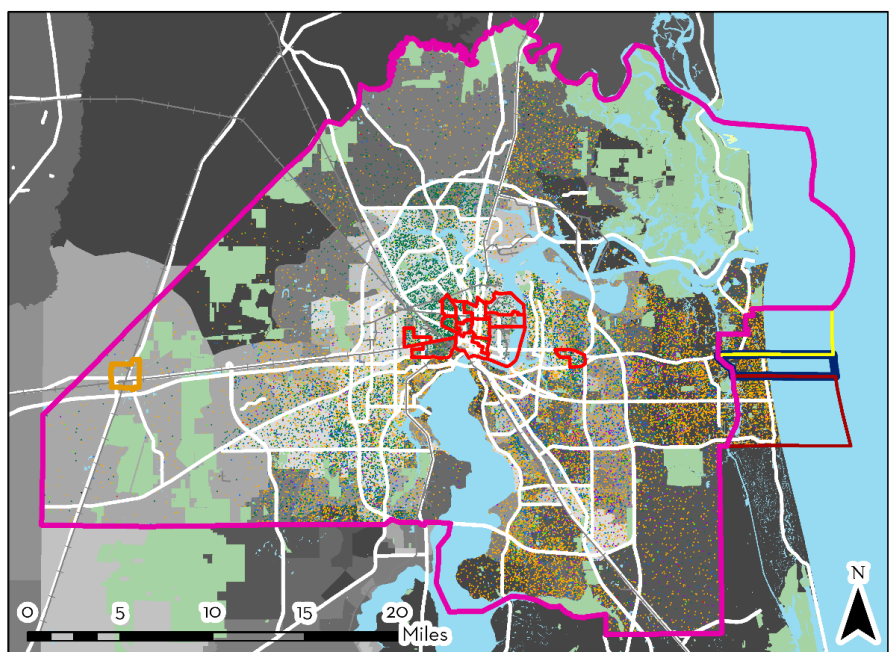
School Name	Number of Students (all grades)	Percent White Students	Percent Economically Disadvantaged	Percent English Language Learners	Percent with Disabilities	Percent Homeless Students	School Grade
Alfred I. Dupont	702	16.4%	98.6%	19.8%	20.5%	1.9%	D
Arlington Middle	768	15.6%	100%	11.7%	23.4%	Not available	D
Baldwin Middle-Senior High	1,349	58.8%	65.7%	1.3%	13.6%	1.1%	B
Bridge to Success	542	9.2%	100%	Not available	26%	Not available	Maintaining
Charger Academy	884	17.2%	100%	7.1%	16.7%	3.5%	C
Darnell-Cookman School of the Medical Arts	1,130	15.8%	44.3%	1.7%	4.2%	Not available	A
Duncan Fletcher Middle	1,172	63.6%	30.5%	2.7%	16.6%	Not available	A
Duval Virtual	3,535	24.9%	39.1%	2.0%	17.7%	0.3%	N/A
Fort Caroline Middle	468	13.9%	100%	2.1%	13.9%	Not available	C
GRASP Academy	261	46.7%	79.7%	Not available	76.6%	Not available	Maintaining
Highlands Middle	685	10.4%	100%	2.9%	18.4%	2.8%	C
James Weldon Johnson	999	31.0%	26.9%	Not available	5.5%	Not available	A
Jean Ribault Middle	687	4.8%	100%	Not available	21.3%	4.8%	C
Julia Landon	858	51.7%	16.8%	1.3%	9.0%	Not available	A
John E. Ford K-8	627	12.3%	94.4%	Not available	15.9%	1.8%	B

School Name	Number of Students (all grades)	Percent White Students	Percent Economically Disadvantaged	Percent English Language Learners	Percent with Disabilities	Percent Homeless Students	School Grade
Joseph Stilwell Middle	576	28.8%	100%	7.1%	28.8%	Not available	C
Kernan Middle	1,175	40.7%	75.9%	5.7%	28.5%	1.1%	B
Lake Shore Middle	995	17.5%	100%	5.1%	28.9%	2.5%	D
Landmark Middle	1,075	33.8%	81.4%	4.7%	20.6%	2.0%	B
LaVilla School of the Arts	958	47.4%	27.2%	Not available	11.5%	Not available	A
Mandarin Middle	1,192	54.4%	35.2%	4.6%	12.7%	1.0%	B
Matthew Gilbert Middle	728	4.1%	100%	Not available	18.7%	4.1%	D
Mayport Middle	790	54.6%	63.5%	Not available	20.6%	Not available	A
Oceanway School	1,041	45.6%	77.4%	1.8%	20.3%	Not available	C
Southside Middle	851	19.3%	98.2%	28.2%	15.7%	4.3%	C
Springfield	874	16.7%	66.8%	Not available	9.6%	Not available	A
Twin Lakes Academy Middle	1,155	33.1%	71.6%	9.7%	16.2%	2.9%	C
Westside Middle	594	15.8%	100%	6.4%	17.3%	Not available	C
Westview K-8 School	1,313	17.8%	100%	7.8%	22.8%	2.2%	B
Young Men's and Women's Leadership Academy	325	4.3%	100%	Not available	29.5%	Not available	C

Source: Florida Department of Education, 2020-2021.

Analysis of school proficiency by location across the county shows that block groups that rank highest on HUD’s School Proficiency Index tend to be located in east Duval County, including Atlantic Beach, Jacksonville Beach, and Neptune Beach; southeast Duval County; and parts of north and west Jacksonville along the county line and bordering the Timucuan Ecological and Historical Preserve (see Figure 21). Block groups that rank lowest on the index are clustered in the urban core and west Jacksonville.

FIGURE 21: SCHOOL PROFICIENCY INDEX BY BLOCK GROUP, DUVAL COUNTY AND SURROUNDING AREA



Source: HUD School Proficiency Index, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

#### School Proficiency Index

<span style="display: inline-block; width: 15px; height: 15px; background-color: #D3D3D3; border: 1px solid black; margin-right: 5px;"></span> 0 - 20	<span style="display: inline-block; width: 15px; height: 15px; background-color: #696969; border: 1px solid black; margin-right: 5px;"></span> 51 - 60
<span style="display: inline-block; width: 15px; height: 15px; background-color: #A9A9A9; border: 1px solid black; margin-right: 5px;"></span> 21 - 30	<span style="display: inline-block; width: 15px; height: 15px; background-color: #404040; border: 1px solid black; margin-right: 5px;"></span> 61 - 70
<span style="display: inline-block; width: 15px; height: 15px; background-color: #808080; border: 1px solid black; margin-right: 5px;"></span> 31 - 40	<span style="display: inline-block; width: 15px; height: 15px; background-color: #202020; border: 1px solid black; margin-right: 5px;"></span> 71 - 80
<span style="display: inline-block; width: 15px; height: 15px; background-color: #606060; border: 1px solid black; margin-right: 5px;"></span> 41 - 50	<span style="display: inline-block; width: 15px; height: 15px; background-color: #000000; border: 1px solid black; margin-right: 5px;"></span> 81 - 99

#### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

The seven middle schools that scored an A grade are located in several neighborhoods and areas of the county, including Atlantic Beach, Jacksonville Beach, San Marco, Springfield, downtown, and West Jacksonville. The four middle schools that scored a D grade are clustered in central Jacksonville, including in the urban core, southwest, southeast, and Arlington.

**xvi. Informed by community participation, any consultation with other relevant government agencies, and the PHA's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools for school-aged children who live in public housing and HCV-assisted housing.**

Stakeholder engagement on fair housing and access to opportunity indicates that disparities in access to proficient schools is a primary concern among residents who live in public and HCV-assisted housing. Among survey respondents who live in public housing or use Housing Choice Vouchers, 20% said that schools are equally provided across all communities in Jacksonville, while 66.7% said that they are not equally provided. Jacksonville Housing's data on locations of public and assisted housing, detailed in Section V(D), shows that public housing and HCV-assisted housing is clustered in the urban core and west Jacksonville, areas which tend to have lower levels of access to proficient schools. Participants in community workshops noted that the clustering of residents who use Housing Choice Vouchers in these areas is due to the lack of affordable housing options in other areas of the county and resistance by landlords to accepting vouchers. Jacksonville Housing staff noted that housing and land prices are limiting factors for the agency's ability to acquire new housing in areas of opportunity throughout the county. While these factors continue to be limitations, the agency has developed new housing in higher opportunity areas such as Jacksonville Beach through the Rental Assistance Demonstration- Project Based Voucher program. There is a need to continue to develop more public and affordable housing in areas with access to proficient schools and to increase acceptance of Housing Choice Vouchers in these areas to support access to the district's proficient schools for all residents.

In addition to the need for programs, policies, and funding to increase residents' ability to live in areas with proficient schools, there is a high level of need for strategies to meet the needs of students who attend the district's lower-performing schools. The community schools model is an example of an approach to education that seeks to meet students' needs, in which families, communities, and schools partner to provide:

- Expanded and enriched learning time, including after-school programs, summer programs, and culturally relevant, real-world learning opportunities;

- Active family and community engagement, including service provision and meaningful partnership with students, families, and community members;
- Collaborative leadership and practices, including coordination of community school services; site-based, cross-stakeholder leadership teams; teacher learning communities; and the ongoing sharing and use of early warning data; and
- Integrated student supports, mental and physical health care, nutrition support, and housing assistance, which are often provided through strategic community partnerships.<sup>16</sup>

Examples of this approach currently being employed in Jacksonville and Duval County include the work of Communities in Schools of Jacksonville, which provides case management, literacy support, and after school programming. Funding for similar programs that provide collaborative, integrated support for students can help increase access to proficient schools for public and assisted housing residents who may lack the opportunity to move to higher-performing school districts.

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<sup>16</sup> Center for Universal Education at Brookings. (2021). Addressing education inequality with a next generation of community schools: A blueprint for mayors, states, and the federal government; Maier, Daniel, Oakes, and Lam. (2017). Community Schools as an Effective School Improvement Strategy: A Review of the Evidence. Learning Policy Institute and National Education Policy Center.

## Employment

- xvii. **For the protected class groups HUD has provided data, describe how the disparities in access to employment relate to residential living patterns. Are there any disparities in access to employment for protected class groups based on where they live?**

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. Labor market engagement and jobs proximity, when considered together, often offer a better indication of how accessible jobs are for residents.

## Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In Duval County, 30.7% of residents aged 25 and over hold a bachelor's degree or higher, a share similar to that of the state of Florida overall (30.5%).<sup>17</sup> Geographic disparities exist, with the percentage of residents with bachelor's degrees or higher ranging from 4.7% to 76.7% across the county's census tracts. Residents of Jacksonville Beach, Atlantic Beach, southeast Jacksonville, Neptune Beach, and of the Ortega and Avondale neighborhoods (located just north of the Jacksonville Naval Air Station) tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in the urban core neighborhoods north of downtown Jacksonville (see Figure 22).

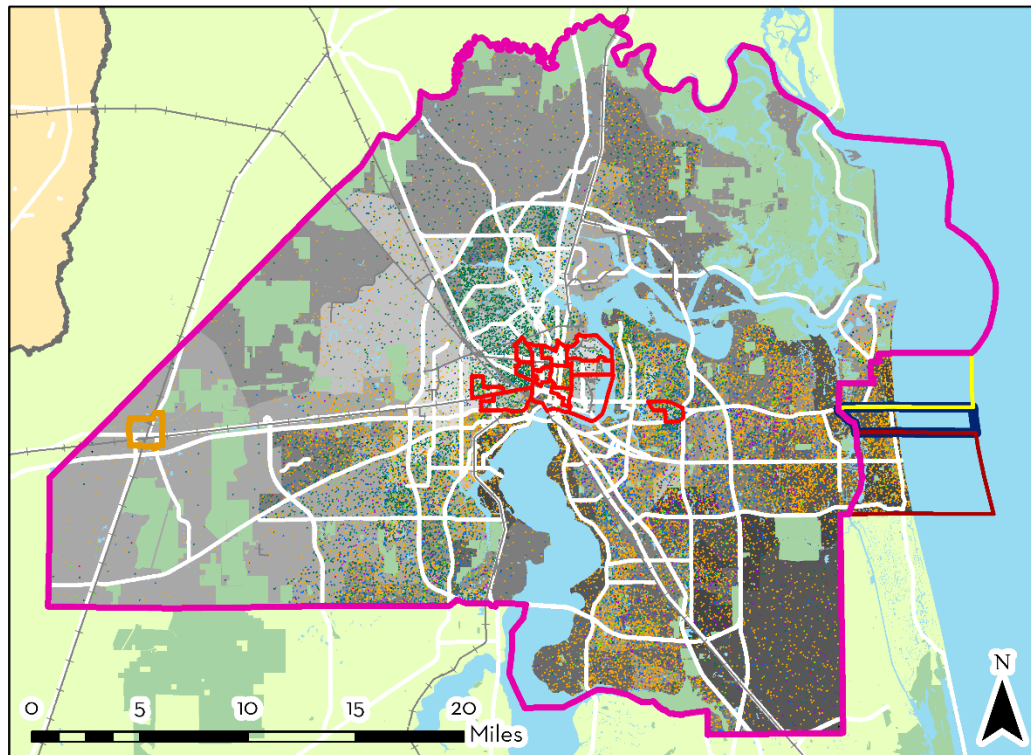
Disparities in educational attainment also exist by race and ethnicity in the county. Asian or Pacific Islander and white residents tend to have higher levels of educational attainment (49.3% and 33.8% have a bachelor's degree or higher, respectively), while Black residents are least likely to have higher levels of education (20.6% have a bachelor's degree or higher; see Figure 23).

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<sup>17</sup> American Community Survey 5-Year Estimates (2016-2020).



FIGURE 22: EDUCATIONAL ATTAINMENT BY RACE / ETHNICITY, DUVAL COUNTY, 2016 TO 2020



Source: 2016-2020 American Community Survey Five-Year Estimates, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County

- Florida
- Georgia

- Parks
- Water
- Racially/Ethnically Concentrated Areas of Poverty

### Percent of Population Aged 25+ with Bachelor's Degree or Higher

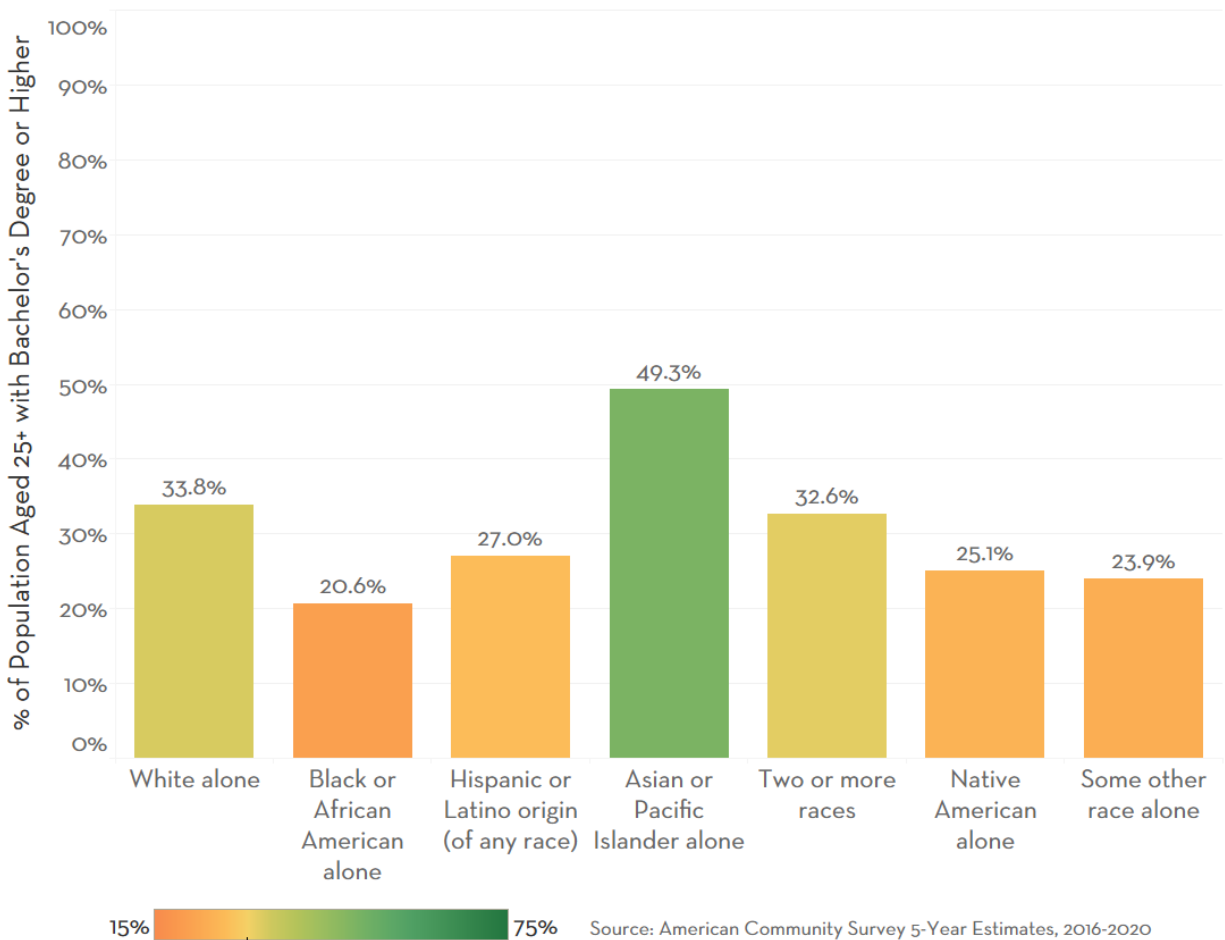
- |  |  |
|--|--|
| <span style="background-color: lightgrey; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 5% - 10% | <span style="background-color: darkgrey; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 30% - 40% |
| <span style="background-color: grey; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 10% - 15%     | <span style="background-color: black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 40% - 50%    |
| <span style="background-color: darkgrey; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 15% - 20% | <span style="background-color: black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 50% - 60%    |
| <span style="background-color: black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 20% - 30%    | <span style="background-color: black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 60% - 77%    |

### Race + Ethnicity

1 Dot = 25 People

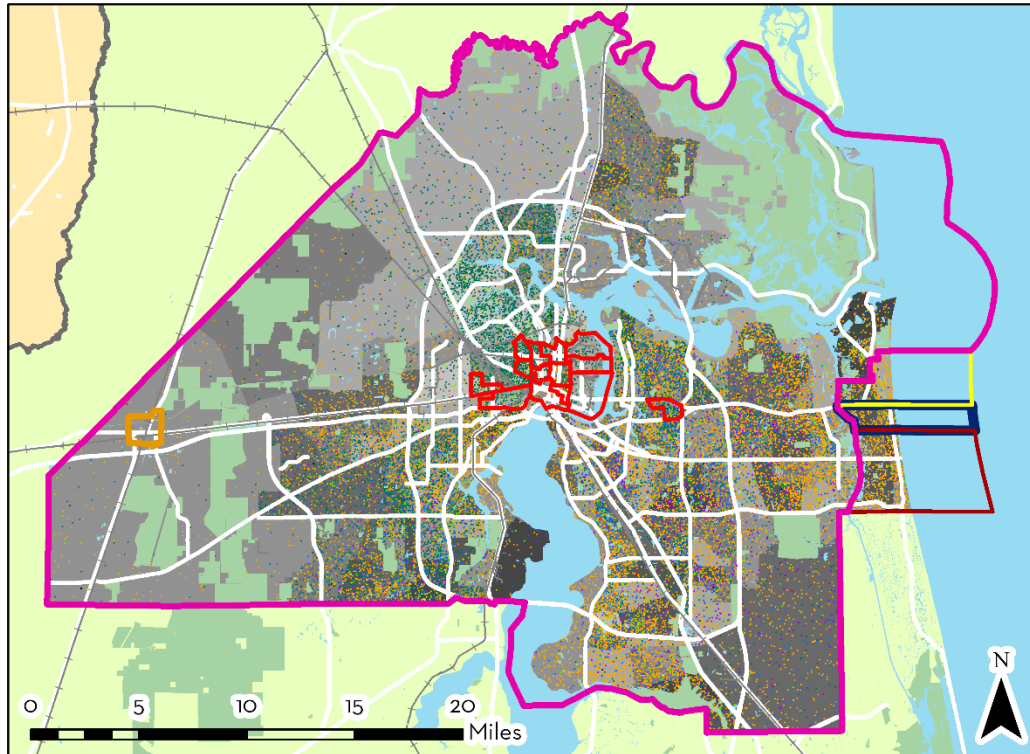
- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 23: EDUCATIONAL ATTAINMENT BY RACE/ ETHNICITY, DUVAL COUNTY, 2016-2020



An estimated 66.0% of the population aged 16 and over in Duval County participates in the labor force, a higher rate than in the state of Florida overall (58.9%). As with educational attainment, geographic disparities exist, with labor force participation rates ranging from 9.1% to 93.3% in census tracts across the county. Residents of parts of downtown and the urban core participate in the labor force at the lowest levels, while participation tends to be highest in parts of south and east Duval County (see Figure 24).

FIGURE 24: LABOR FORCE PARTICIPATION AND RACE / ETHNICITY



Source: 2016-2020 American Community Survey Five-Year Estimates, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County

- Florida
- Georgia

- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

### Percent of Population Aged 16+ in Labor Force

- |  |  |
|--|--|
| <span style="background-color: #f8d7da; border: 1px solid #f5c6cb; padding: 2px;"> </span> Less Than 40% | <span style="background-color: #6c757d; border: 1px solid #6c757d; padding: 2px;"> </span> 65% - 70% |
| <span style="background-color: #d6d8db; border: 1px solid #d6d8db; padding: 2px;"> </span> 40% - 50%     | <span style="background-color: #545a5c; border: 1px solid #545a5c; padding: 2px;"> </span> 70% - 75% |
| <span style="background-color: #c6c8ca; border: 1px solid #c6c8ca; padding: 2px;"> </span> 50% - 60%     | <span style="background-color: #343738; border: 1px solid #343738; padding: 2px;"> </span> 75% - 80% |
| <span style="background-color: #bcbddc; border: 1px solid #bcbddc; padding: 2px;"> </span> 60% - 65%     | <span style="background-color: #212529; border: 1px solid #212529; padding: 2px;"> </span> 80% - 93% |

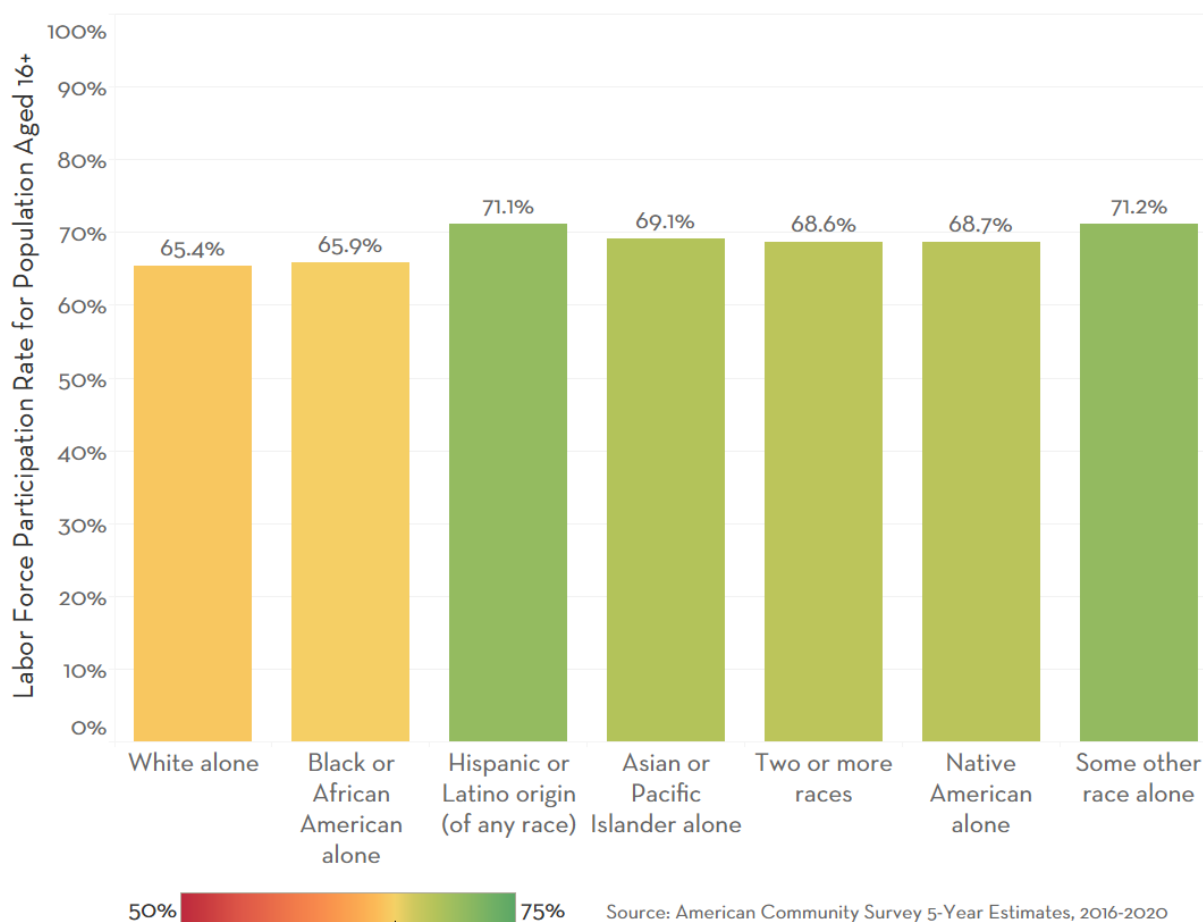
### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

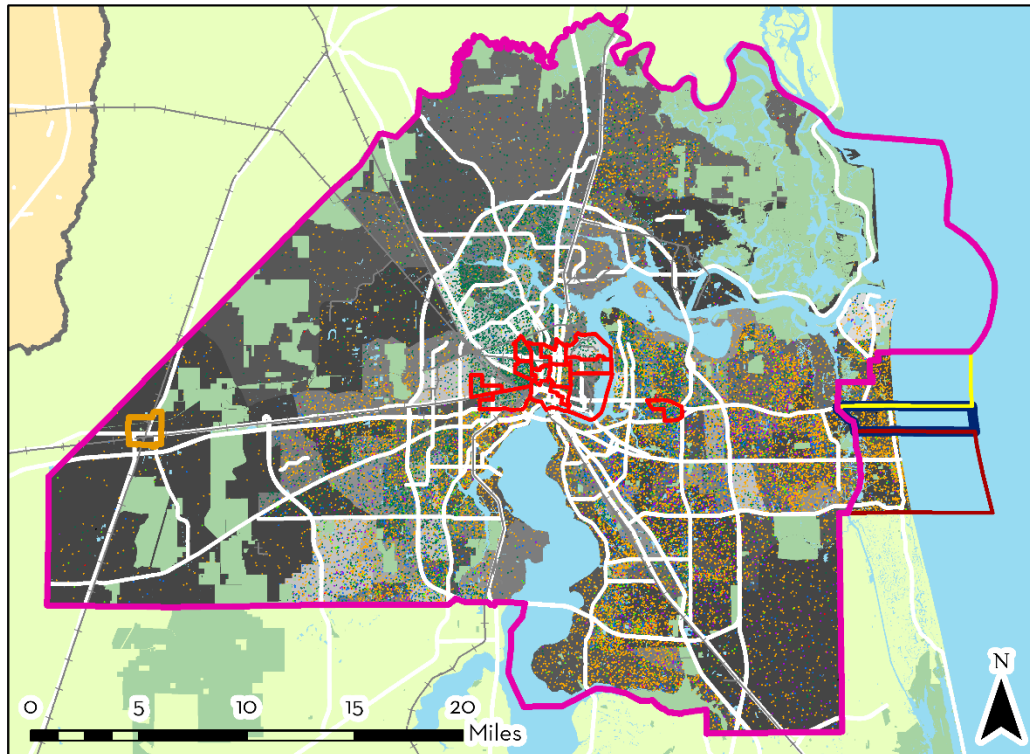
Labor force participation is highest among residents of other races and Hispanic and Latino residents (71.2% and 71.1% of whom participate in the labor force, respectively) and lowest among white and Black residents (65.4% and 65.9% of whom participate, respectively; see Figure 25).

FIGURE 25: LABOR FORCE PARTICIPATION BY RACE / ETHNICITY, DUVAL COUNTY, 2016 TO 2020



An estimated 5.3% of Duval County residents were unemployed as of the 2016-2020 ACS five-year estimates, a rate similar to that of the state of Florida overall (5.4%). More recent data from the Florida Department of Economic Opportunity shows the county's unemployment rate at 3.1% as of July 2022, down from 4.8% in July 2021. As with educational attainment and labor force participation, unemployment varies across the county's census tracts, ranging from less than 1% in 14 tracts in east, southeast, and west Duval County to greater than 20% in three tracts in the urban core north of downtown Jacksonville (see Figure 26). Eight census tracts in the urban core had unemployment rates above 15% as of the 2016-2020 ACS five-year estimates.

FIGURE 26. UNEMPLOYMENT RATE AND RACE / ETHNICITY



Source: 2016-2020 American Community Survey Five-Year Estimates, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County

- Florida
- Georgia

- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

### Unemployment Rate, Civilian Population Aged 16+

- |   |  |
|---|--|
| <span style="background-color: black; width: 20px; height: 10px; display: inline-block;"></span> 0% - 2%      | <span style="background-color: gray; width: 20px; height: 10px; display: inline-block;"></span> 8% - 10%           |
| <span style="background-color: darkgray; width: 20px; height: 10px; display: inline-block;"></span> 2% - 4%   | <span style="background-color: lightgray; width: 20px; height: 10px; display: inline-block;"></span> 10% - 12%     |
| <span style="background-color: mediumgray; width: 20px; height: 10px; display: inline-block;"></span> 4% - 6% | <span style="background-color: verylightgray; width: 20px; height: 10px; display: inline-block;"></span> 12% - 15% |
| <span style="background-color: darkgray; width: 20px; height: 10px; display: inline-block;"></span> 6% - 8%   | <span style="background-color: verylightgray; width: 20px; height: 10px; display: inline-block;"></span> 15% - 25% |

### Race + Ethnicity

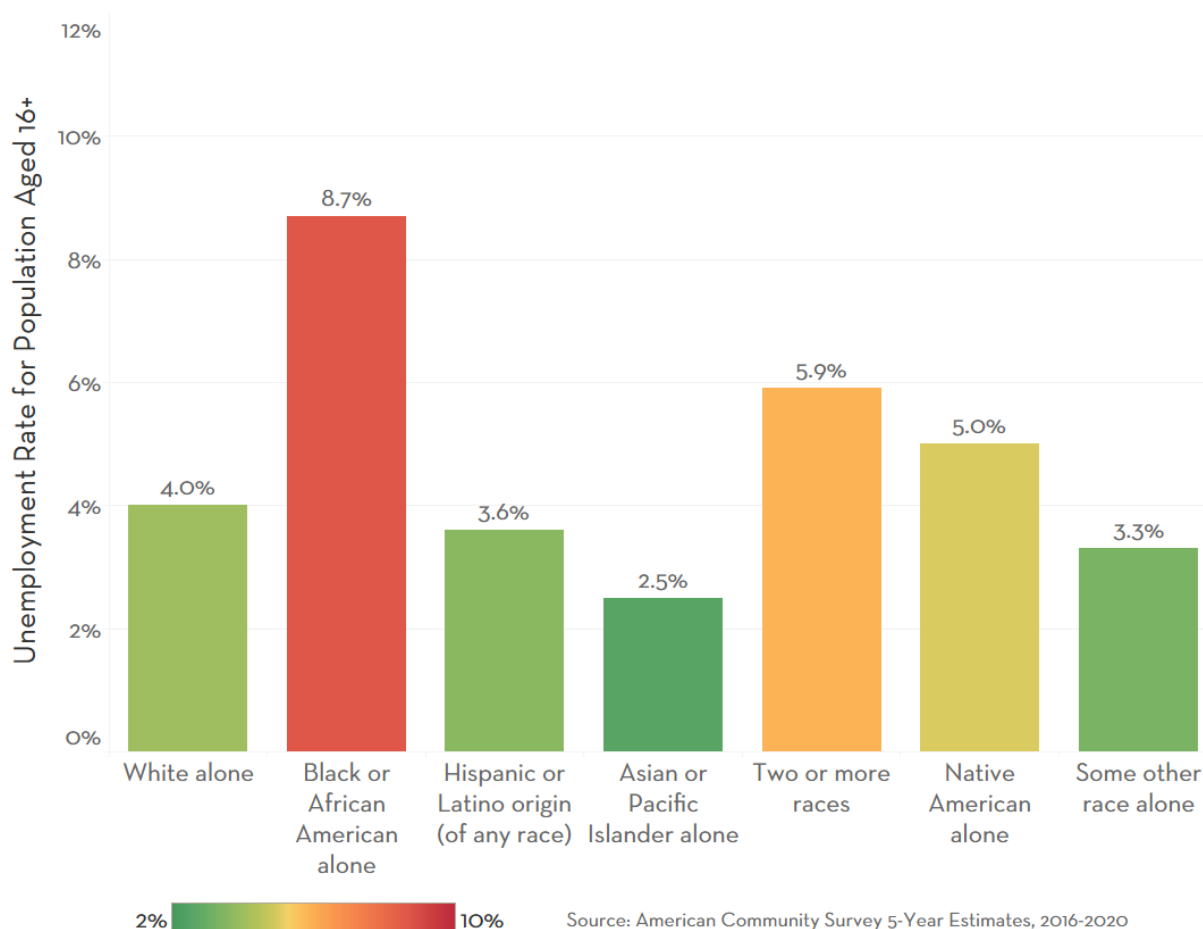
1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic



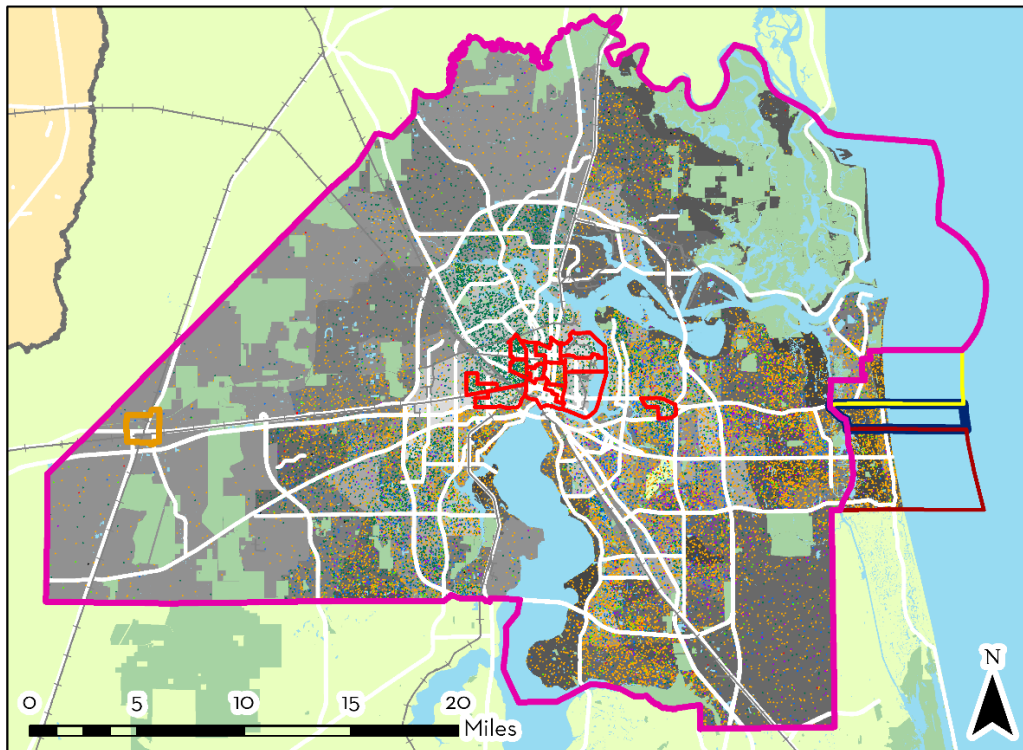
Unemployment is highest among Black or African American residents (8.7%) and lowest among Asian or Pacific Islander residents, residents of other races, and Hispanic or Latino residents (2.5%, 3.3%, and 3.6%, respectively; see Figure 27).

FIGURE 27. UNEMPLOYMENT BY RACE / ETHNICITY, DUVAL COUNTY, 2016 TO 2020



Household income is another indicator of access to employment and jobs that pay living wages. The median household income in Duval County overall is \$56,769; yet, incomes vary significantly across the county's census tracts. Median household incomes are lowest in downtown Jacksonville and the city's urban core neighborhoods, where they fall below \$25,000 in seven census tracts. Median incomes tend to be highest in parts of southeast Duval County, Jacksonville Beach, Atlantic Beach, and Neptune Beach, topping \$100,000 in 14 census tracts (see Figure 28). Median household incomes are highest for Asian and white households (\$75,374 and \$65,330, respectively) and lowest for Black or African American households (\$41,664; see Figure 29).

FIGURE 28: MEDIAN HOUSEHOLD INCOME AND RACE / ETHNICITY



Source: 2016-2020 American Community Survey Five-Year Estimates, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

Duval County

Florida

Georgia

Parks

Water

Racially/Ethnically  
Concentrated  
Areas of Poverty

### Median Household Income

<span style="display: inline-block; width: 20px; height: 10px; background-color: lightgray; margin-right: 5px;"></span> \$13,000 - \$30,000	<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$60,000 - \$70,000
<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$30,000 - \$40,000	<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$70,000 - \$90,000
<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$40,000 - \$50,000	<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$90,000 - \$110,000
<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$50,000 - \$60,000	<span style="display: inline-block; width: 20px; height: 10px; background-color: gray; margin-right: 5px;"></span> \$110,000 - \$165,000

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 29: MEDIAN HOUSEHOLD INCOME BY RACE/ETHNICITY, DUVAL COUNTY, 2016-2020



Low median household incomes in many of the county's census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. Costs for a family of two working adults and one child in Duval County, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, are estimated at about \$6,201 per month (or \$74,413 annually).<sup>18</sup> Yet, 18.5% of primary jobs held by residents pay \$1,250 per month or less (\$15,000 or less per year), and 38.2% of those jobs pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per year).<sup>19</sup>

<sup>18</sup> MIT Living Wage Calculator. (2020). Retrieved from: <https://livingwage.mit.edu/>.

<sup>19</sup> United States Census Bureau. OnTheMap. (2019). Retrieved from: <https://onthemap.ces.census.gov/>.

## Jobs Proximity

Census tracts with the greatest numbers of jobs are clustered in downtown and southeast Jacksonville and at and around the Jacksonville International Airport. Census tracts with the fewest jobs are clustered in the urban core north of downtown Jacksonville (see Figure 30).

Residents and stakeholders who participated in this planning process noted that low frequency of public transportation outside of the urban core is often a barrier to accessing employment for residents who do not have vehicles.

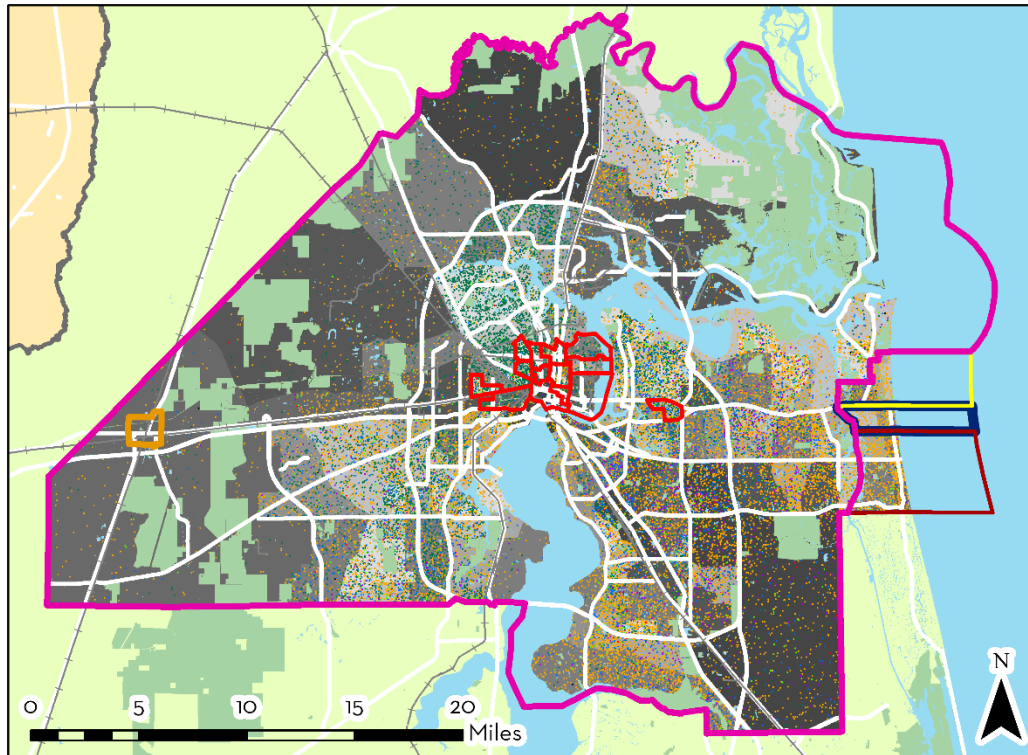
Longitudinal Employer-Household Dynamics data also indicates that a substantial share of workers living in Duval County work outside of the county. Specifically, an estimated 421,572 employed residents live in Duval County. These include 316,474 residents (75.1%) who both live and work in Duval County, and 105,098 residents who live in Duval County but work outside of the county (24.9%; see Table 7). Similarly, of the 515,481 residents employed in Duval County, 199,007 (38.6%) live outside of the county. The high level of commuting across jurisdictions indicates that limited access to vehicles and a lack of frequent public transportation are barriers for residents in accessing employment.

TABLE 7: INFLOW AND OUTFLOW OF WORKERS (PRIMARY JOBS)

Inflow and Outflow of Workers	#	%
<b>LIVING IN DUVAL COUNTY</b>	<b>421,572</b>	<b>100.0%</b>
Living in Duval County but Employed Outside of the County	105,098	24.9%
Living and Employed in Duval County	316,474	75.1%
<b>EMPLOYED IN DUVAL COUNTY</b>	<b>515,481</b>	<b>100.0%</b>
Employed in Duval County but Living Outside of the County	199,007	38.6
Employed and Living in Duval County	316,474	61.4%

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2019.

FIGURE 30: JOBS PROXIMITY AND RACE / ETHNICITY



Source: U.S. Census Bureau, OnTheMap, 2019, 2020 Census Redistricting Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

  Duval County

  Florida

  Georgia

  Parks

  Water

  Racially/Ethnically  
Concentrated  
Areas of Poverty

### Number of Jobs by Census Tract

<span style="background-color: #d3d3d3; border: 1px solid black; padding: 2px;"> </span> 42 - 500	<span style="background-color: #808080; border: 1px solid black; padding: 2px;"> </span> 2,001 - 4,000
<span style="background-color: #a9a9a9; border: 1px solid black; padding: 2px;"> </span> 501 - 1,000	<span style="background-color: #696969; border: 1px solid black; padding: 2px;"> </span> 4,001 - 8,000
<span style="background-color: #808080; border: 1px solid black; padding: 2px;"> </span> 1,001 - 1,500	<span style="background-color: #404040; border: 1px solid black; padding: 2px;"> </span> 8,001 - 15,000
<span style="background-color: #696969; border: 1px solid black; padding: 2px;"> </span> 1,501 - 2,000	<span style="background-color: #202020; border: 1px solid black; padding: 2px;"> </span> 15,001 - 36,000

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic



**xviii. Informed by community participation, any consultation with other relevant government agencies, and the PHA's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment for residents of public housing and HCV-assisted housing.**

Residents and stakeholders who participated in this planning process described several barriers that limit access to employment for residents of public and HCV-assisted housing, including an overall lack of affordable housing in the county, difficulty using vouchers and limited availability of public housing in some areas with high concentrations of jobs, and limited access to public transportation in some areas. Low levels of labor market engagement in areas of the county where public and assisted housing is clustered further limit employment opportunities.

Residents and stakeholders noted that the lack of affordable housing in many areas of the county and the limited acceptance of vouchers by landlords limit housing choices for residents. Participants in community workshops also noted that voucher amounts are frequently not sufficient for residents to afford higher rents in many areas of the county. Limited access to and low frequency of public transportation may further limit residents' ability to live farther away from their places of work. Residents also may choose to live in neighborhoods in which they have strong networks of family, friends, and other community resources.

For these reasons, Housing Choice vouchers have been most heavily used in the neighborhoods north of downtown Jacksonville. Public housing and project-based voucher properties are also clustered in these neighborhoods. While many of the census tracts in these neighborhoods have some of the lowest numbers of jobs in the county, they offer proximity to downtown Jacksonville- one of the county's job-rich areas- and provide high levels of access to public transit. Other job-rich census tracts, such as those in southeast Jacksonville, tend to have less affordable housing and be less accessible via public transportation. These high-opportunity areas often have much lower numbers of public housing/project-based voucher properties and of residents using Housing Choice Vouchers.

The combination of low supply of affordable rental housing in many areas of the county, limited acceptance of vouchers by landlords, and low levels of access to public transit tends to limit the housing choices available in job-rich areas outside of those adjacent to downtown Jacksonville. Public housing and project-based voucher properties are also limited in several job-rich areas of the county, including southeast Jacksonville and around the airport. These barriers may be addressed through programs, policies, and funding mechanisms that support the development of public and affordable housing, increase landlord acceptance of vouchers, and assist residents in securing housing in areas with access to employment, public transit, and other opportunity factors discussed in this section.

In addition to the availability of affordable housing and public transportation, residents' ability to access employment is shaped by labor market engagement factors such as educational attainment and the availability of resources and services to connect residents to available jobs. Unemployment and labor force participation rates tend to be high and educational attainment tends to be lower in the neighborhoods north of downtown Jacksonville, where much of the public housing is clustered and where Housing Choice Vouchers are most heavily used.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages, connections to the training necessary to obtain those jobs, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and resources.<sup>20</sup> In addition to connecting residents to available jobs, there is a need to collaborate on efforts to bring new commercial activity into neighborhoods with the lowest levels of labor market engagement to create jobs and provide needed services.

Planning efforts underway in the county provide recommendations for increasing labor market engagement and earnings in Duval County. The Northeast Florida Regional Council's Comprehensive Economic Development Strategy (2021) details strategies including coordinating and deploying social and wrap-around services to reach residents in need; continuing to build upon and expand experiential learning opportunities; codifying career pathways through employer engagement; and advocating and supporting regional public and private investment in transportation services to increase workforce accessibility and mobility, among others.<sup>21</sup> Efforts to address these and other economic and workforce development goals can be targeted to areas of the county with lower levels of labor market engagement. In addition to increasing access to affordable housing and transportation opportunities, these efforts are vital to improving labor market engagement among protected classes and thus to increasing housing choice and economic mobility in Duval County.

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<sup>20</sup> Nelson, M., Wolf-Powers, L., & Fisch, J. (2015). Persistent low wages in New Orleans' economic resurgence: policies for improving earnings for the working poor. In The Data Center. (2015). New Orleans Index at 10.

<sup>21</sup> Northeast Florida Regional Council. (2021). Comprehensive Economic Development Strategy 2020. Featuring Elevate Northeast Florida. 2021 CEDS Update. Retrieved from: <https://www.nefrc.org/ceds>

## Transportation

- xix. For the protected class groups HUD has provided data, describe how disparities in access to transportation relate to residential living patterns. Are there any disparities in access to transportation for protected class groups based on where they live?**

Affordable, accessible transportation makes it easier for residents to access a range of opportunities—providing connections to employment, education, fresh food, healthcare, and other services. While low-cost public transit can facilitate access to these resources, a lack of access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

## Access to Affordable Public Transportation

The Jacksonville Transportation Authority provides fixed-route bus, paratransit, on-demand, regional, monorail, and ferry services in Duval County, including:

- fixed-route bus and trolley services, including frequent (15-20 minutes), express (peak service), and local (30-60 minutes) routes, community shuttles (on-call service), and trolleys in the beaches and Riverside/ Avondale areas (seasonal/irregular service; see Figure 31);
- the fixed-route First Coast Flyer, which connects downtown Jacksonville with north, east, southeast, and southwest Duval County, offering fewer stops, shorter waits, easier transfers and more frequent trips;
- RediRide on-call transportation in specific zones, including free rides to and from grocery stores for residents of the Northside RediRide zone;
- Connexion and Connexion Plus paratransit services, providing destination-to-destination shared public transportation for people with disabilities;
- regional inter-county connections to Baker, Clay, Nassau, Putnam, and St. Johns counties, scheduled around common work hours;
- the complimentary SkyWay monorail system, which connects downtown Jacksonville to Kings Avenue on the Southbank; and
- ferry services from Mayport Village to Ft. George Island.

## ASSESSMENT OF FAIR HOUSING



FIGURE 32: FIRST COAST FLYER BUS STOP, FIVE POINTS NEIGHBORHOOD

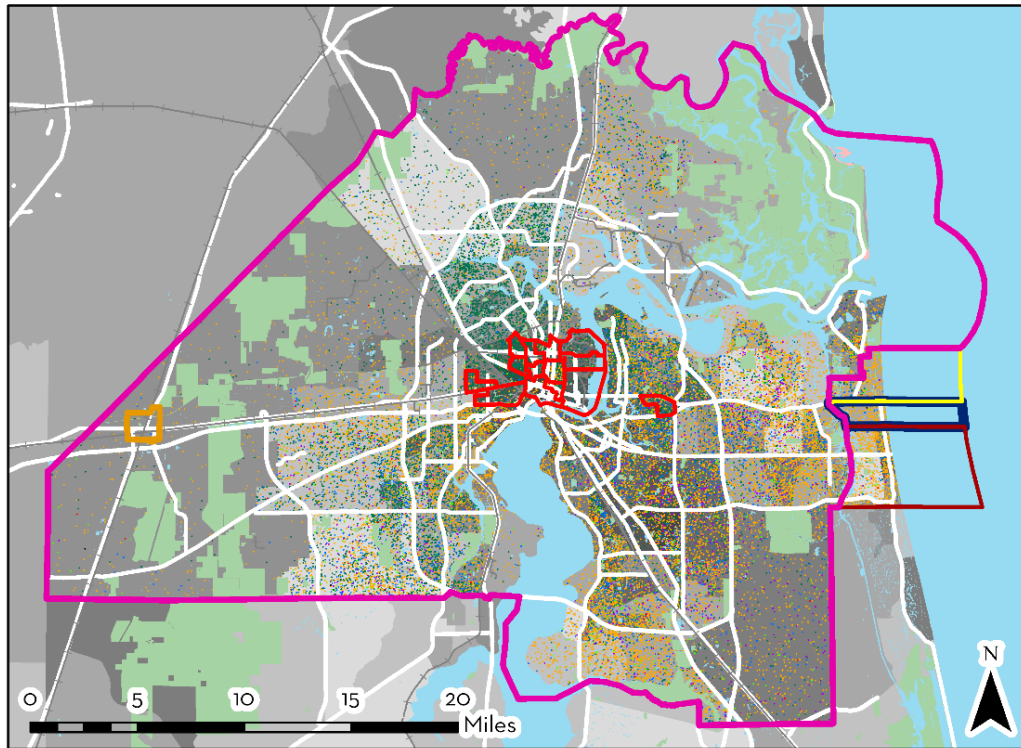


HUD's Location Affordability Index models the numbers of transit trips for households by census tract. Estimates of the number of transit trips taken by a three-person, single-parent family with income at 50% of the area median shows that residents of census tracts around downtown Jacksonville and parts of southeast Duval County are most likely to use transit, while residents of tracts in parts of east, southwest, and north Jacksonville are least likely to use transit (see Figure 33).

Combined housing and transportation costs make up the lowest percent of income in census tracts in and around downtown Jacksonville and the Southbank, which have the greatest access to the Jacksonville Transportation Authority network. Combined housing and transportation costs tend to make up a greater share of income in east and southeast Duval County, areas with lower levels of access to public transit (Figure 34). In parts of east, southwest, and north Duval County, the combination of lower proximity to jobs and high proportions of residents' incomes spent on housing and transportation may present barriers to obtaining and maintaining employment and housing.



FIGURE 33: NUMBER OF TRANSIT TRIPS FOR LOW-INCOME RENTER HOUSEHOLDS, DUVAL COUNTY AND SURROUNDING AREA



Source: 2020 Census Redistricting Data, Location Affordability Index v. 3 (2012-2016)

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

\*based on estimates of transit trips taken by a 3-person single-parent family with income at 50% of the median income for renters for the region

### Number of Transit Trips (Low-Income Renter Households)\*

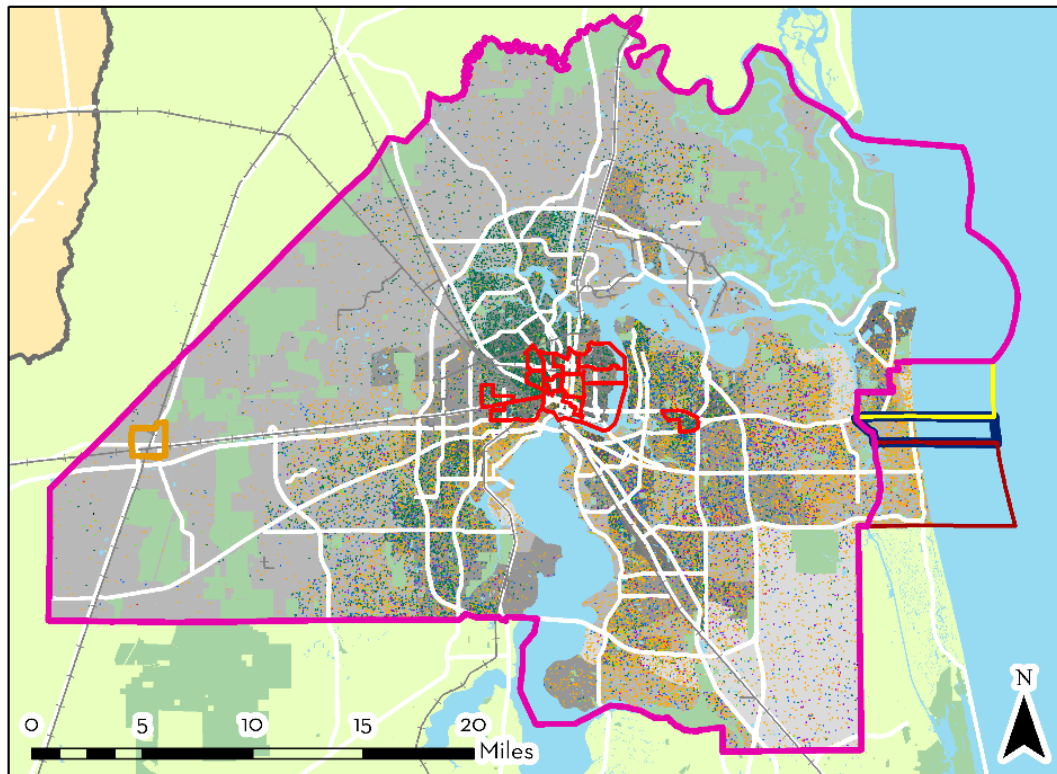
<span style="display: inline-block; width: 20px; height: 10px; background-color: #D3D3D3; border: 1px solid black; margin-right: 5px;"></span> 0 - 20	<span style="display: inline-block; width: 20px; height: 10px; background-color: #696969; border: 1px solid black; margin-right: 5px;"></span> 81 - 100
<span style="display: inline-block; width: 20px; height: 10px; background-color: #A9A9A9; border: 1px solid black; margin-right: 5px;"></span> 21 - 40	<span style="display: inline-block; width: 20px; height: 10px; background-color: #404040; border: 1px solid black; margin-right: 5px;"></span> 101 - 150
<span style="display: inline-block; width: 20px; height: 10px; background-color: #808080; border: 1px solid black; margin-right: 5px;"></span> 41 - 60	<span style="display: inline-block; width: 20px; height: 10px; background-color: #2F2F2F; border: 1px solid black; margin-right: 5px;"></span> 151 - 200
<span style="display: inline-block; width: 20px; height: 10px; background-color: #646464; border: 1px solid black; margin-right: 5px;"></span> 61 - 80	<span style="display: inline-block; width: 20px; height: 10px; background-color: #191919; border: 1px solid black; margin-right: 5px;"></span> 201 - 326

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 34. HOUSING AND TRANSPORTATION AFFORDABILITY AND RACE / ETHNICITY



Source: 2020 Census Redistricting Data, Center for Neighborhood Technology H + T Index (2017 Update)

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

  Duval County

  Florida

  Georgia

  Parks

  Water

  Racially/Ethnically

  Concentrated  
Areas of Poverty

### Housing + Transportation Costs as % of Income for Moderate-Income Household\*

<span style="background-color: black; width: 20px; height: 10px; display: inline-block;"></span> 25% - 30%	<span style="background-color: gray; width: 20px; height: 10px; display: inline-block;"></span> 50% - 60%
<span style="background-color: darkgray; width: 20px; height: 10px; display: inline-block;"></span> 30% - 40%	<span style="background-color: lightgray; width: 20px; height: 10px; display: inline-block;"></span> 60% - 80%
<span style="background-color: mediumgray; width: 20px; height: 10px; display: inline-block;"></span> 40% - 50%	<span style="background-color: verylightgray; width: 20px; height: 10px; display: inline-block;"></span> 80% - 99%

\*Costs are estimated for moderate-income household in region with household income of \$41,598

### Race + Ethnicity

1 Dot = 25 People

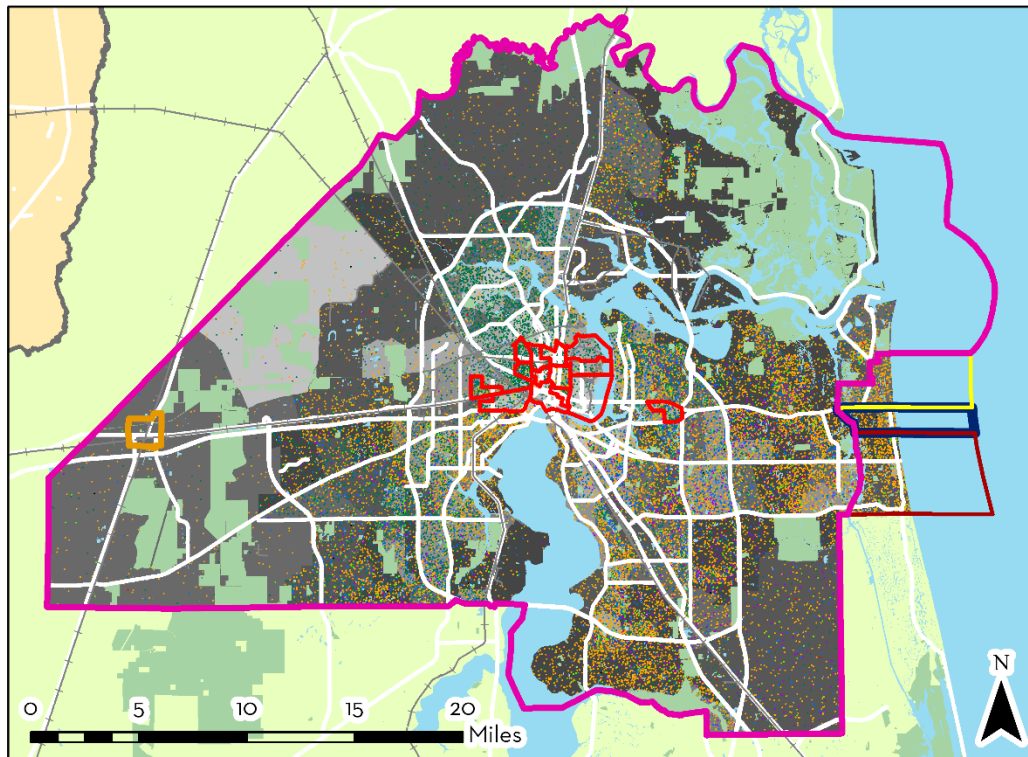
- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

## Vehicle Access

Access to vehicles also shapes residents' ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 7.6% of households in Duval County do not have a vehicle available, according to American Community Survey five-year estimates for 2016 to 2020. While vehicle access is high overall, disparities exist by geography and reflect access to public transit in the county. Residents of downtown Jacksonville and the urban core, areas with the greatest access to public transit, tend to own vehicles at the lowest rates: in seven census tracts, about 30% to 55% of households do not have a vehicle. In contrast, in most of east and south Duval County, fewer than 2% of households do not have access to vehicles, reflecting a need for vehicle ownership in areas with less access to public transit (see Figure 35).

Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and with limited access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available. The combination of high levels of vehicle ownership and high transportation costs as a percentage of household income in areas that are not well served by public transit reflects a need for transportation options that reduce household transportation costs in these areas.

FIGURE 35. VEHICLE ACCESS AND RACE / ETHNICITY



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

  Duval County

  Florida

  Georgia

  Parks

  Water

  Racially/Ethnically  
Concentrated  
Areas of Poverty

### Percent of Households with No Vehicle

<span style="background-color: black; width: 20px; height: 10px; display: inline-block;"></span> 0% - 2%	<span style="background-color: gray; width: 20px; height: 10px; display: inline-block;"></span> 8% - 15%
<span style="background-color: darkgray; width: 20px; height: 10px; display: inline-block;"></span> 2% - 4%	<span style="background-color: lightgray; width: 20px; height: 10px; display: inline-block;"></span> 15% - 25%
<span style="background-color: mediumgray; width: 20px; height: 10px; display: inline-block;"></span> 4% - 6%	<span style="background-color: verylightgray; width: 20px; height: 10px; display: inline-block;"></span> 25% - 35%
<span style="background-color: lightgray; width: 20px; height: 10px; display: inline-block;"></span> 6% - 8%	<span style="background-color: white; width: 20px; height: 10px; display: inline-block;"></span> 35% - 55%

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

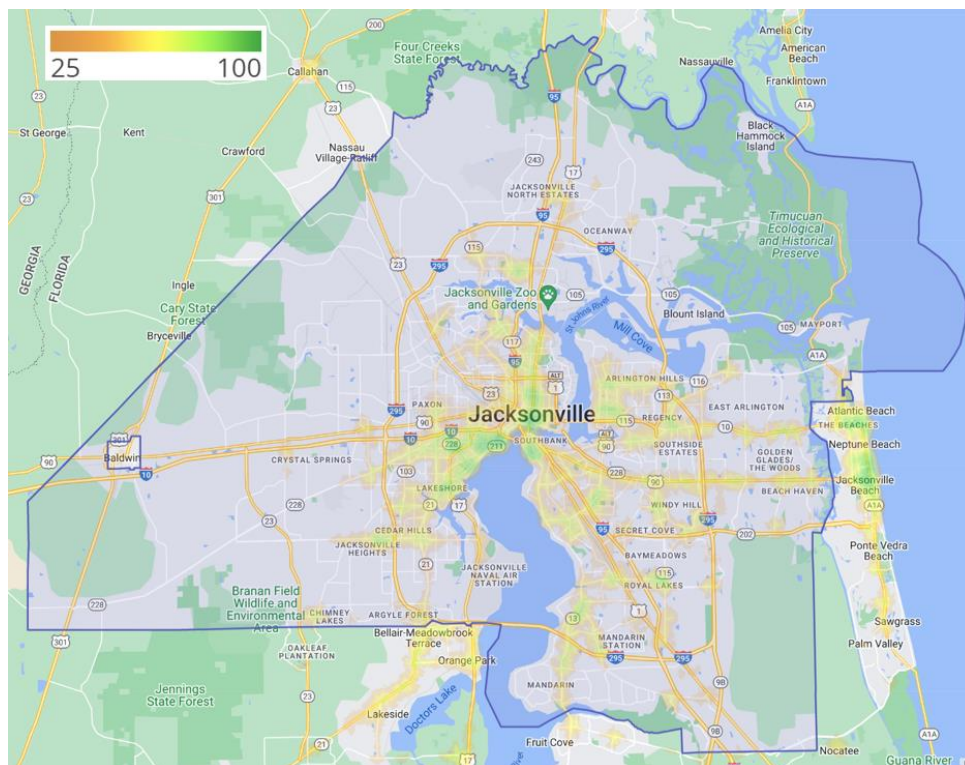


## Walkability

Along with access to transit, low-cost public transportation, and vehicles, walkability shapes the extent to which residents are able to access employment, resources, and services. While the county is generally car-dependent, several neighborhoods-particularly in central Jacksonville, Atlantic Beach, Neptune Beach, and Jacksonville Beach- have moderate to high levels of walkability (shown in green and yellow in Figure 36). Residents and stakeholders emphasized that some areas lack accessible sidewalks or lighting, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities.

In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. Overall low levels of walkability in the county combined with low levels of access to public transit point to challenges for residents without access to vehicles in connecting to employment, resources, and services.

FIGURE 36. WALKABILITY IN JACKSONVILLE



Source: Walkscore.

**xx. Informed by community participation, any consultation with other relevant government agencies, and the PHA's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation for residents of public housing and HCV-assisted housing.**

Residents and stakeholders who participated in this planning process emphasized that public transit access and frequency of service shape residents' housing choices. Stakeholders noted that residents often do not consider housing options in areas of the county without frequent bus service, and low levels of access and frequency of service often make it infeasible for residents to live in one area and work in another. Many of the county's higher-opportunity areas have lower levels of access to public transportation, which creates barriers to locating in those areas for residents who rely on bus and other public transportation services.

Several programs aim to expand access to public transportation in areas of the county that have less frequent bus service, and to support increased access for low-income residents and those with disabilities. Programs like the Jacksonville Transportation Authority's RediRide, Connexion, and Connexion Plus reduce disparities in access to transportation by filling gaps in the fixed-route system, although these programs have some limitations (i.e., the RediRide program requires users to be picked up and dropped off in the same zone). For example, the Door to Store program provides free rides to eight grocery store locations for residents living in the JTA's Northside RediRide Zone. The City of Jacksonville also offers door-to-door transportation to and from its senior centers for eligible seniors living in Duval County.



### Access to Low Poverty Neighborhoods

- xxi. For the protected class groups HUD has provided data, describe how the disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the service area and region. Are there any disparities in access to low poverty neighborhoods for protected class groups based on where they live?**

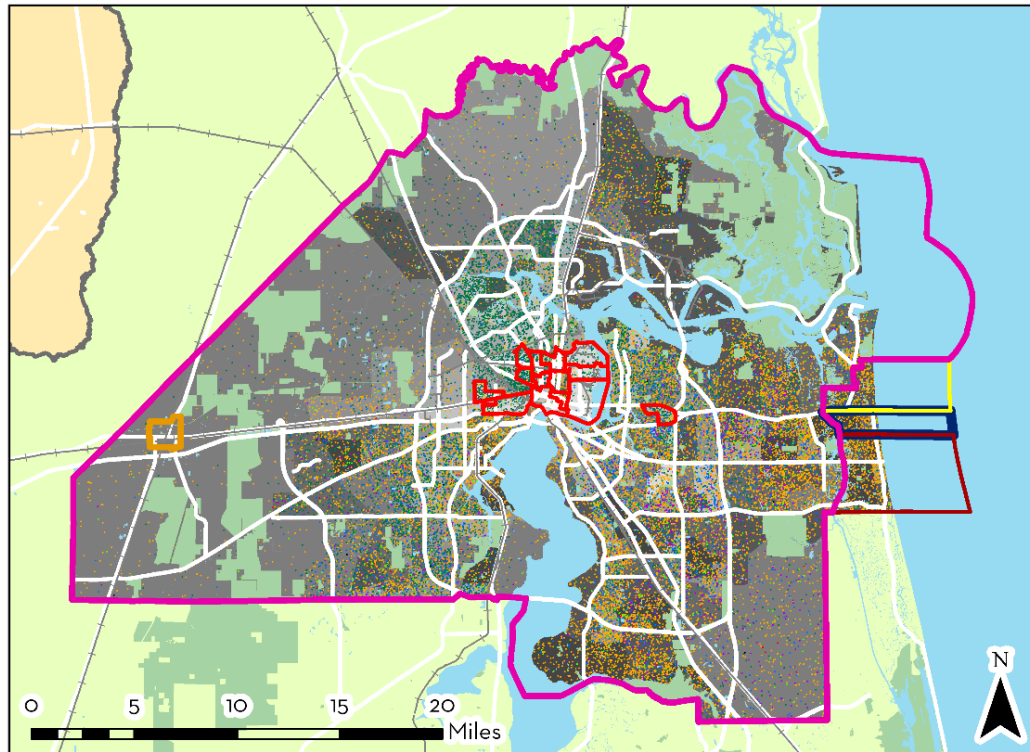
Poverty rates in Duval County are highest in the census tracts around downtown Jacksonville, including the neighborhoods of Tallyrand, Longbranch, Fairfield, Hogan's Creek, Mid-Westside, Lackawanna, Mixon Town, parts of West Jacksonville, and the Woodland Acres, Killarney Shores, and Brackridge neighborhoods of east and southeast Jacksonville (see Figure 37).

As of the 2016-2020 American Community Survey, 14 census tracts in the county had poverty rates above 36.9% (more than three times the poverty rate in the metro area of 12.3%). 13 of those 14 tracts fit the U.S. Department of Housing and Urban Development's definition of racially or ethnically concentrated areas of poverty (R/ECAPs), defined as census tracts in which 1) more than half of the population is non-white and 2) 40% or more of the population is in poverty, or the poverty rate is greater than three times the average poverty rate in the area, whichever is lower.

R/ECAPs in Duval County and the region are clustered in the census tracts around downtown Jacksonville (see Figure 38). Of the 13 R/ECAP tracts, seven have populations that are more than 85% Black or African American, indicating disparities in access to low-poverty neighborhoods by race and ethnicity. Regional maps of poverty levels by national origin and family status do not indicate disparities among those protected classes.

Census tracts with the lowest poverty levels are clustered in east and south Duval County and tend to have greater shares of white residents (see Figure 37).

FIGURE 37: PERCENT OF POPULATION BELOW POVERTY LEVEL AND RACE/ETHNICITY



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County

- Florida
- Georgia

- Parks
- Water

- Racially/Ethnically Concentrated Areas of Poverty

### Percent of Population Below Poverty Level in Past 12 Months

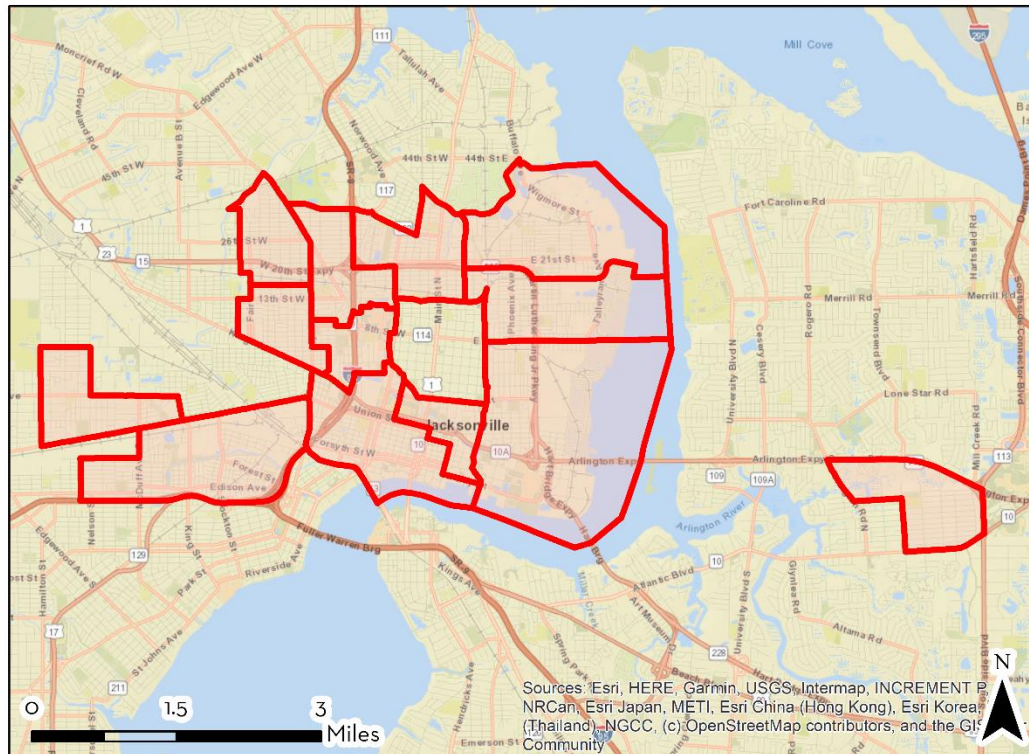
- |   |   |
|---|---|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: black; margin-right: 5px;"></span> 1% - 4%     | <span style="display: inline-block; width: 15px; height: 15px; background-color: #6c757d; margin-right: 5px;"></span> 15% - 20% |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #495052; margin-right: 5px;"></span> 4% - 7%   | <span style="display: inline-block; width: 15px; height: 15px; background-color: #555a5e; margin-right: 5px;"></span> 20% - 30% |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #343738; margin-right: 5px;"></span> 7% - 10%  | <span style="display: inline-block; width: 15px; height: 15px; background-color: #6c757d; margin-right: 5px;"></span> 30% - 40% |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #212324; margin-right: 5px;"></span> 10% - 15% | <span style="display: inline-block; width: 15px; height: 15px; background-color: #a6a8aa; margin-right: 5px;"></span> 40% - 54% |

### Race + Ethnicity

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 38: RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY, DUVAL COUNTY



Source: 2020 Census Redistricting Data, 2016-2020 American Community Survey Five-Year Estimates

Racially/Ethnically  
Concentrated  
Areas of Poverty

- xxii. **Informed by community participation, any consultation with other relevant government agencies, and the PHA's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods for residents of public housing and HCV-assisted housing.**

Data on locations of public housing and project-based voucher properties indicates clustering of these properties in areas of the county with higher levels of poverty and in R/ECAP census tracts. In this way, the locations of public housing and project-based voucher properties contribute to clustering of public housing residents in areas of the county with higher poverty rates. Jacksonville Housing staff members noted that the agency is always looking for new properties, but its ability to purchase properties is limited by high land and housing costs in the county.

Residents and stakeholders who participated in this planning process noted that housing choices are often limited by factors including a lack of affordable housing in many areas of the county, limited acceptance of vouchers by landlords, and voucher amounts that are not sufficient to cover market rate rents in many areas of the county. In this way, residents' housing choices are often restricted to areas of the county with more affordable housing, which often coincide with areas of higher poverty. Factors such as transportation access and social networks also shape residents' choices to live in specific neighborhoods.

## Access to Environmentally Healthy Neighborhoods

- xxiii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns. Are there any disparities in access to environmentally healthy neighborhoods for protected class groups based on where they live?**

Environmental quality and access to environmental amenities shape the opportunities available to residents. Access to parks and greenspace can provide a range of environmental, social, and health benefits, including access to nature and recreation opportunities, cleaner air and water, alternative transportation options, improvements in physical and mental health and wellbeing, and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects, including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.<sup>22</sup>

## Access to Parks

In Duval County, parks are most accessible in the urban core neighborhoods, including downtown Jacksonville and surrounding areas. The need for parks is greatest in areas just outside of central Duval County, and in the eastern part of the county in particular (see Figure 39).

Stakeholders emphasized a high level of need for parks and recreation facilities and improvements, noting that significant variation exists between lower- and upper-income areas of the county regarding the quality of parks, available amenities, and maintenance. About 31% of survey respondents noted that parks and trails are equally provided in all communities in Jacksonville, while about 49% said that they are not equally available. Public housing residents and Housing Choice Voucher holders were slightly more likely to indicate that parks and trails are not equally provided across the city (53%). Residents and stakeholders described disparities in funding across the county's parks, noting that while a large number of parks exist in central Duval County, disparities exist between high- and low-income neighborhoods in the quality and maintenance of parks. In this way, while there do not appear to be disparities in access to parks

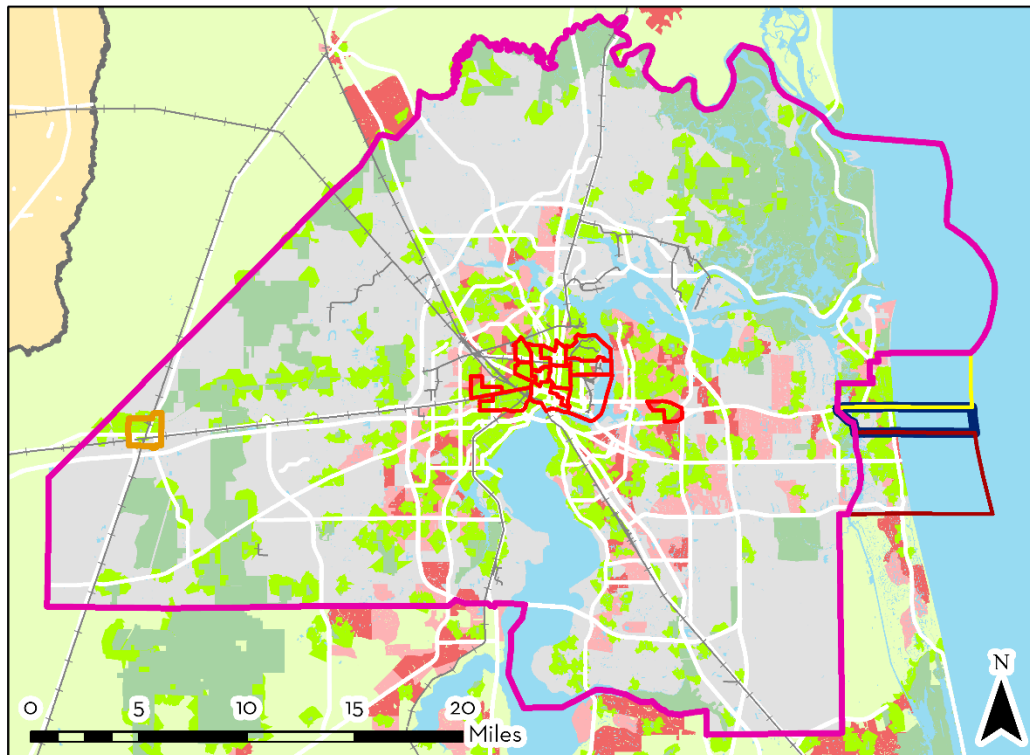
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<sup>22</sup> U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>



by race and ethnicity in the county (see Figure 40), disparities in park quality and maintenance may limit access to opportunity for residents in areas where investment and maintenance in parks has been limited. Residents and stakeholders also described a need to address safety concerns in parks.

FIGURE 39: PARK ACCESS



Source: 2020 Census Redistricting Data, Trust for Public Land ParkServe (2022)

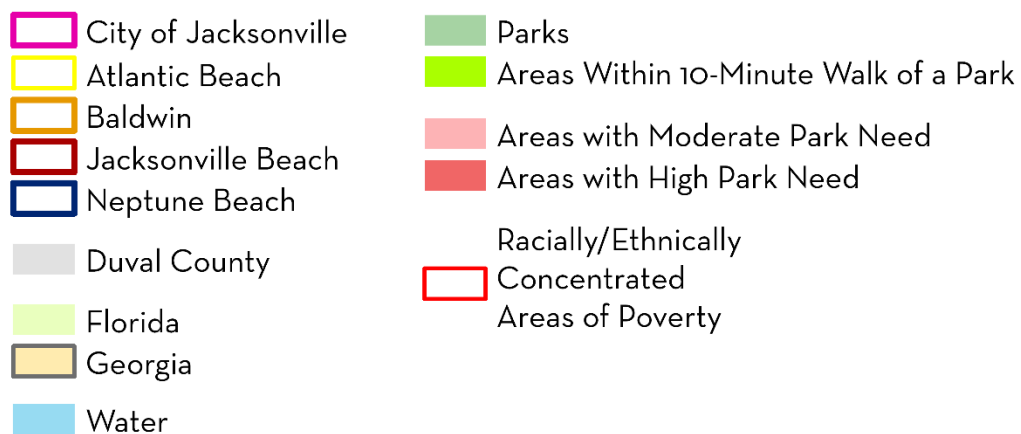
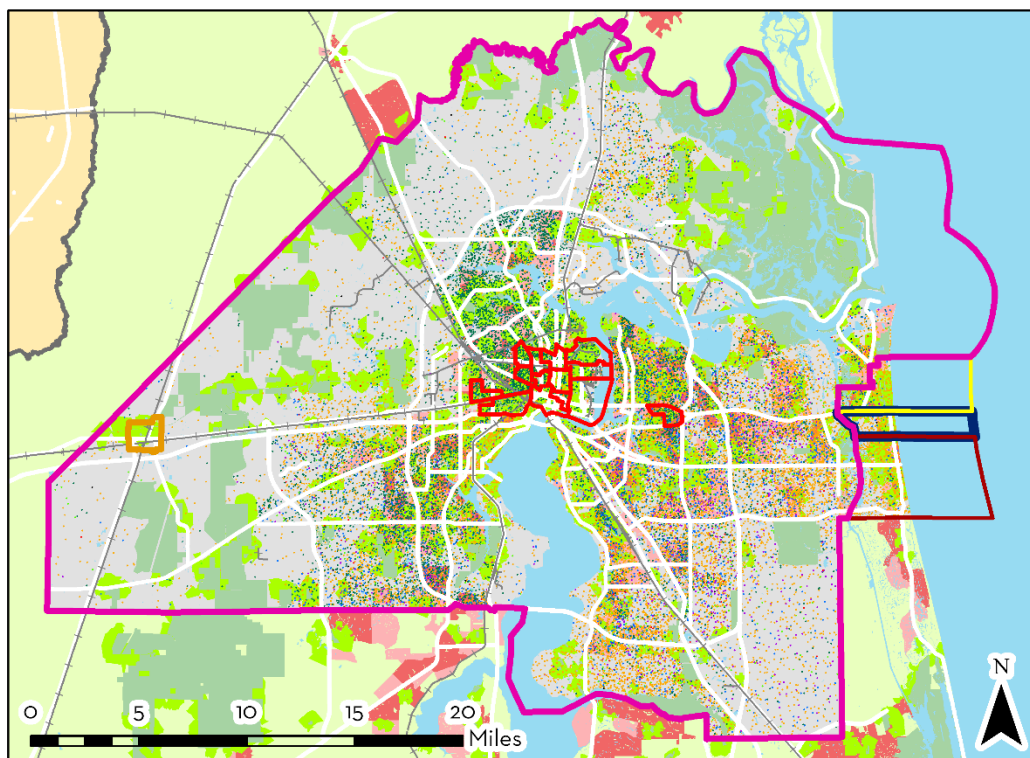




FIGURE 40: PARK ACCESS AND RACE / ETHNICITY



Source: 2020 Census Redistricting Data, Trust for Public Land ParkServe (2022)

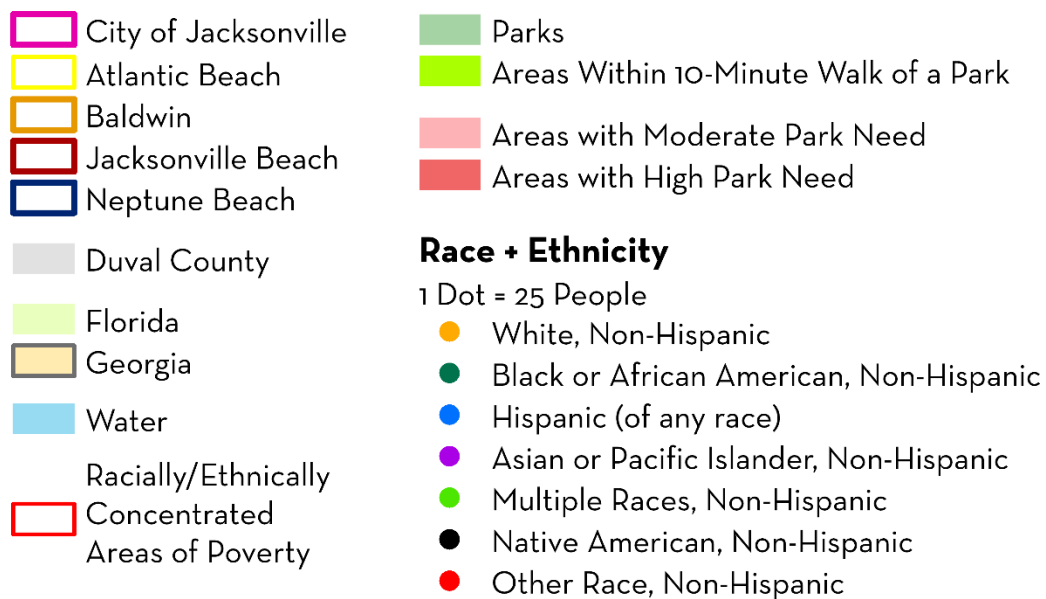


FIGURE 41: EDWARD WATERS PARK, NEW TOWN NEIGHBORHOOD



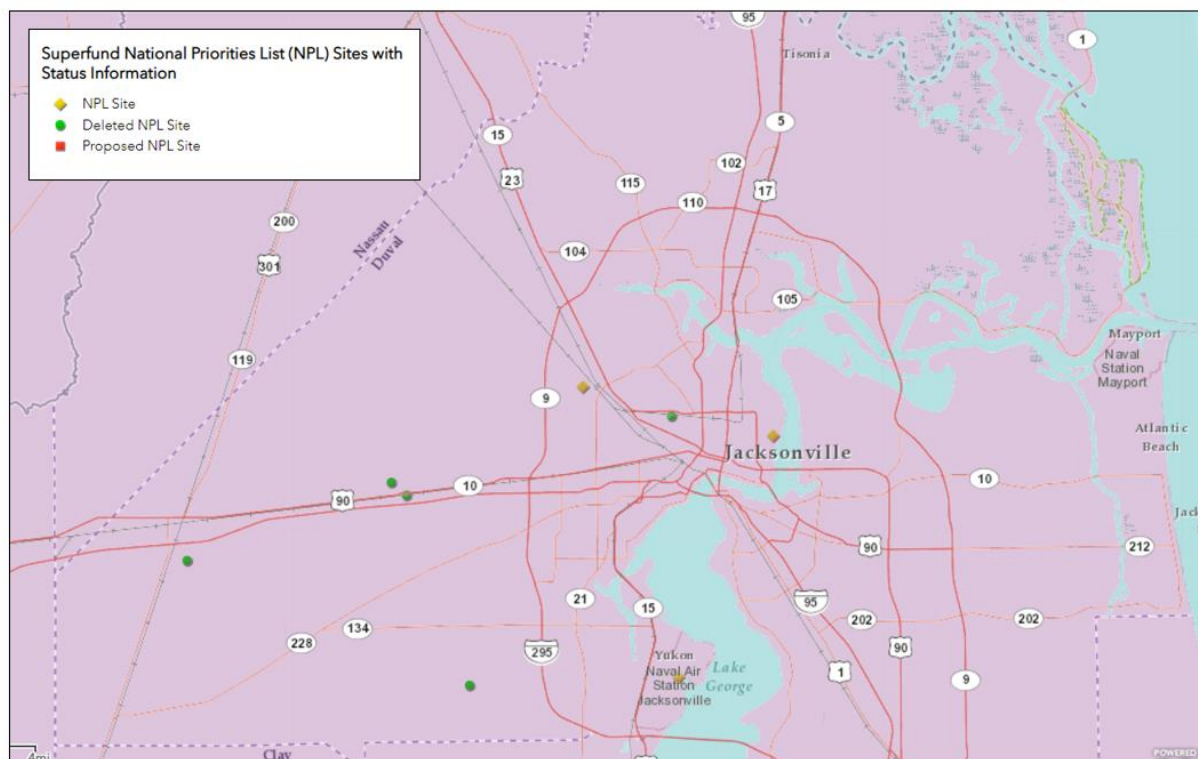


## Environmental Hazards

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL).

Three NPL sites are located in Duval County, including the Kerr-McGee Chemical Corp. in the Fairfield neighborhood, the Picketville Road Landfill in the Picketville neighborhood, and the Jacksonville Naval Air Station in south Duval County (see Figure 42). The U.S. EPA has noted that contamination at the three sites does not currently threaten people living and working near the sites.

FIGURE 42: SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES

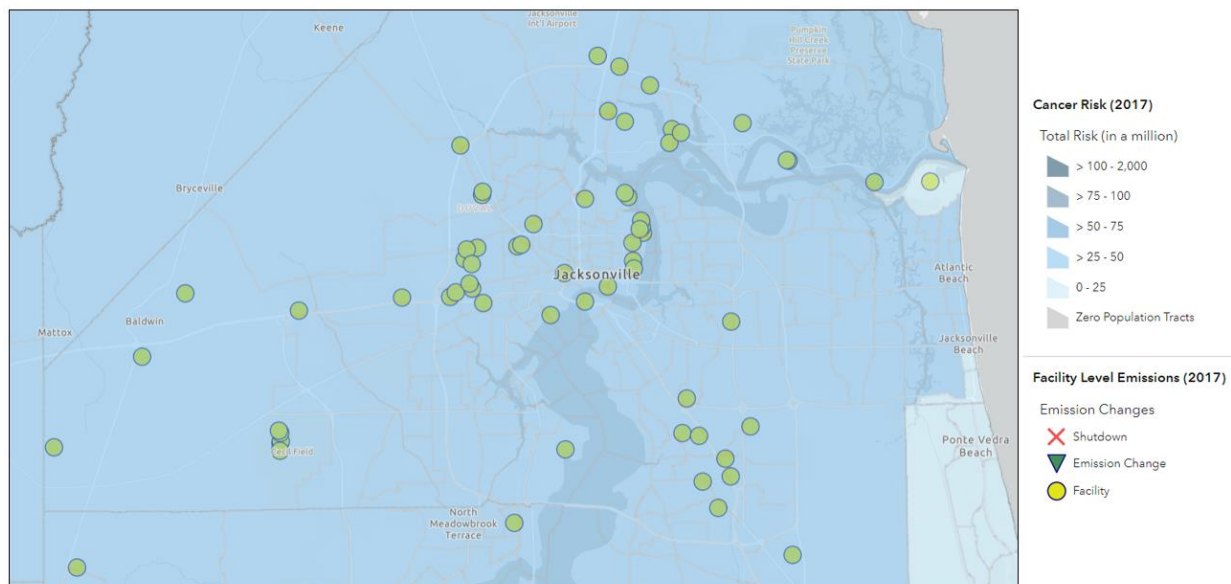


Source: United States Environmental Protection Agency (2022)

The EPA's National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2017 to examine cancer risk from ambient concentrations of pollutants. Duval County has low to moderate levels of cancer risk from air

toxics—ranging from 25 to 50 per million in county census tracts. Point sources of emissions are clustered along the St. Johns River and in west and southeast Duval County (see Figure 43).

**FIGURE 43: INDUSTRIAL FACILITIES AND AIR TOXICS**



Source: United States Environmental Protection Agency Air Toxics Screening Assessment (2017).

The Environmental Protection Agency’s Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site.<sup>23</sup> The EPA’s Risk-Screening Environmental Indicators (RSEI) Model analyzes TRI data on the amount of toxic chemicals released, together with risk factors such as the chemical’s fate and transport through the environment, each chemical’s relative toxicity, and the number of people potentially exposed, to calculate a numeric score designed to be compared to other RSEI scores.<sup>24</sup>

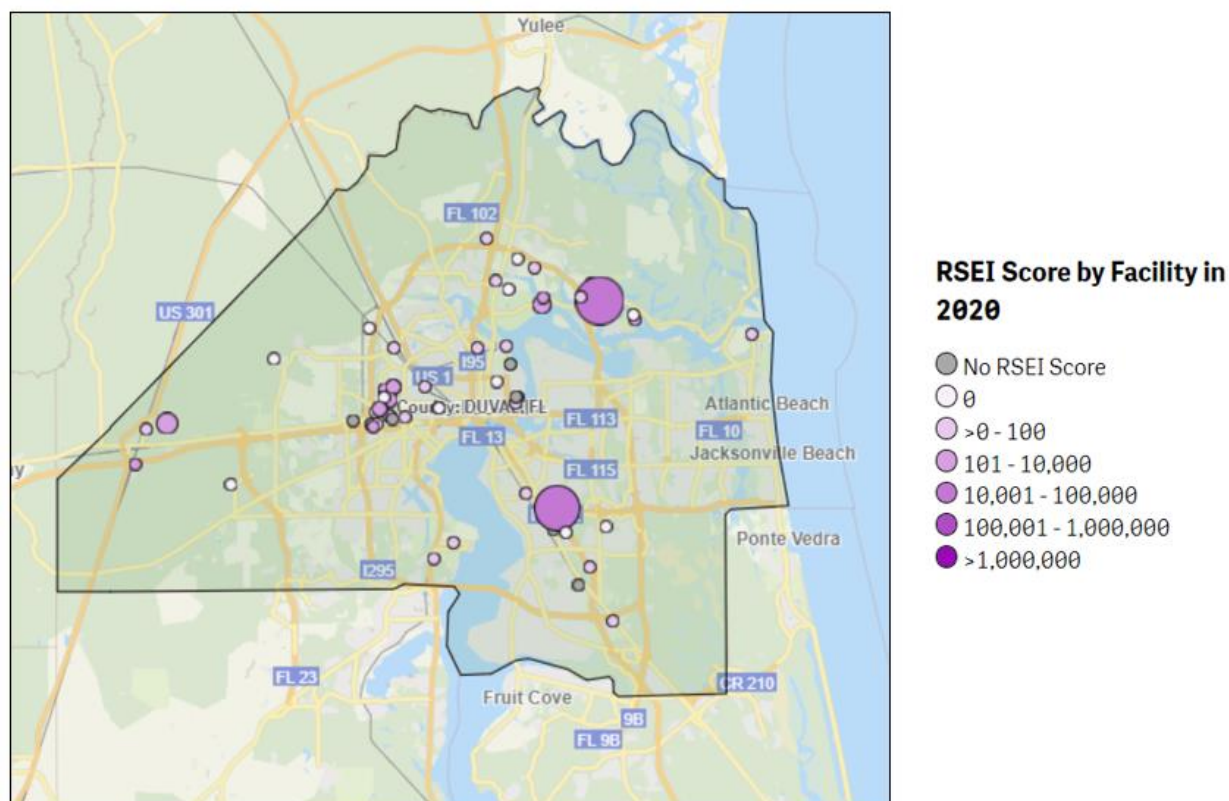
Toxic release inventory sites in Duval County are clustered in west Duval County and along the St. Johns River. While a larger number of TRI sites are clustered in west Duval County, two sites located in east Duval County have higher RSEI scores, indicating higher levels of risk associated with toxic releases. In particular, the Northside Generating Station (electric utilities) and

<sup>23</sup> U.S. EPA. (n.d.) Toxic Release Inventory Program. Retrieved from: <https://www.epa.gov/toxics-release-inventory-tri-program/what-toxics-release-inventory>. Data retrieved from: <https://www.arcgis.com/home/item.html?id=2c4a0b5f85b945f8a67125e6a93fa7fe>

<sup>24</sup> United States Environmental Protection Agency. (n.d.) Risk-Screening Environmental Indicators (RSEI) Model. Retrieved from: <https://www.epa.gov/rsei>

Medtronic Xomed LLC (miscellaneous manufacturing) sites, both located in east Duval County, have potential risk scores that are several times higher than those of other nearby facilities (noted by the size of the purple dots in Figure 44), indicating significantly greater health risks for residents living near these facilities.

FIGURE 44: TOXIC RELEASE INVENTORY FACILITIES



Source: United States Environmental Protection Agency Toxic Release Inventory (2020).

## Food Access

Many individuals and families face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often present barriers to accessing healthy food.<sup>25</sup>

USDA Food Research Atlas data<sup>26</sup> indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in census tracts in the urban core around downtown Jacksonville, several of which fall under HUD's definition of racially and ethnically concentrated areas of poverty (R/ECAPs). In nine census tracts in the urban core, 60% to 78% of residents have low incomes and live more than one-half mile from a supermarket. In seven additional tracts, primarily in west Duval County, between 50% and 60% of residents meet the USDA definition of low income and low access at one-half mile (see Figure 46).

In contrast, portions of south and east Duval County tend to have the lowest proportions of residents with low incomes who live more than one-half mile from a supermarket. In six census tracts, fewer than 5% of residents are considered low-income and low-access.

Survey respondents echoed concerns surrounding food access, with 60% noting that grocery stores and other shopping opportunities are not equally available in all neighborhoods, the highest of all community resources asked about in the survey.

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<sup>25</sup> Valdez Z, Ramírez AS, Estrada E, Grassi K, Nathan S. Community Perspectives on Access to and Availability of Healthy Food in Rural, Low-Resource, Latino Communities. *Prev Chronic Dis* 2016;13:160250.

<sup>26</sup> USDA Economic Research Service. (2019). Food Access Research Atlas. Retrieved from: <https://www.ers.usda.gov/data-products/food-access-research-atlas/>



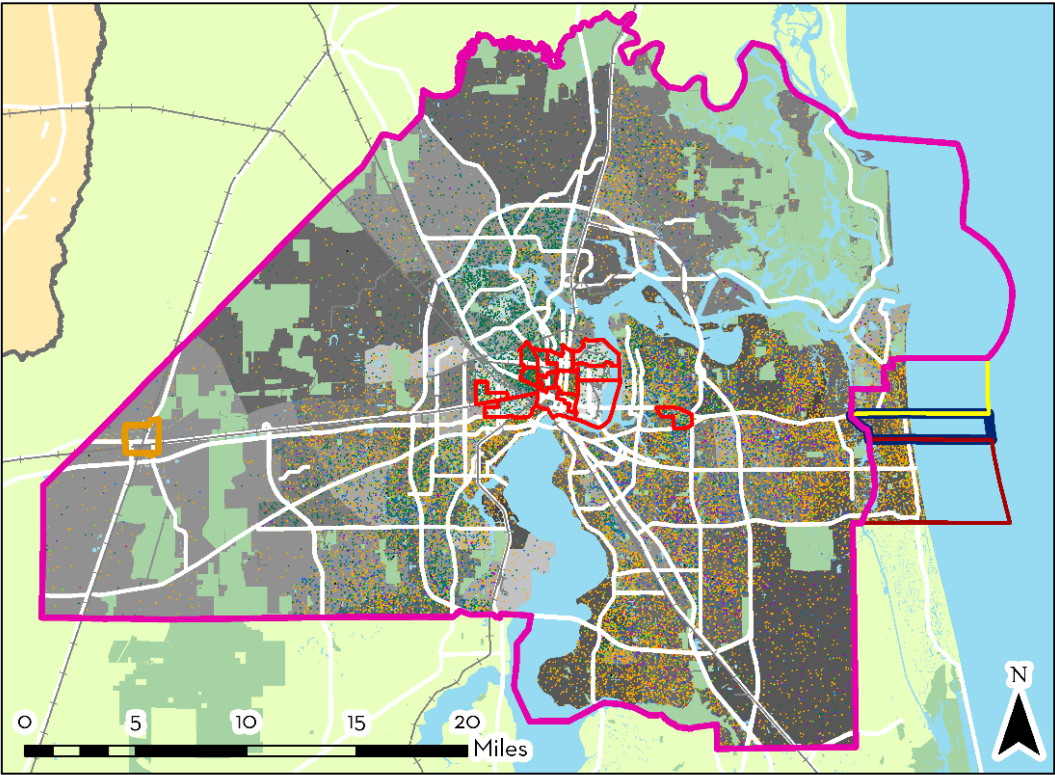
FIGURE 45: HARVEY'S SUPERMARKET, BRENTWOOD PARK NEIGHBORHOOD



Poverty and a lack of access to vehicles also contribute to issues of food access and insecurity in the city and county. An estimated 14.5% of residents in Duval County were living below the federal poverty level as of the 2016-2020 American Community Survey five-year estimates, indicating that low incomes are a barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty rates exist by race: an estimated 22.1% of Black or African American residents were living below the poverty level in the past 12 months from 2016 to 2020, more than two times the share of white non-Hispanic residents living in poverty (10.1%). Poverty rates are highest in the urban core neighborhoods, where they fall above 40% in 11 census tracts.

Further, in many census tracts—particularly in the urban core neighborhoods—significant shares of households do not have a vehicle. 30% to 55% of households do not have a vehicle in seven census tracts in Jacksonville's urban core, several of which are also classified as R/ECAP tracts. Low levels of vehicle access indicate that food access is particularly challenging for significant proportions of households in areas of the county with limited access to public transportation and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the county, the substantial proportions of households with low incomes, and a lack of access to vehicles creates barriers to food access and security.

FIGURE 46: FOOD ACCESS AND RACE/ ETHNICITY



Source: 2020 Census Redistricting Data, USDA Food Access Research Atlas, 2019

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Areas of Poverty

**Percent of Population Who Are Low-Income and Live More Than 1/2 Mile From a Food Store\***

- |  |  |
|--|--|
| <span style="background-color: black; width: 20px; height: 10px; display: inline-block;"></span> 0% - 5%     | <span style="background-color: #696969; width: 20px; height: 10px; display: inline-block;"></span> 30% - 40% |
| <span style="background-color: #404040; width: 20px; height: 10px; display: inline-block;"></span> 5% - 10%  | <span style="background-color: #808080; width: 20px; height: 10px; display: inline-block;"></span> 40% - 50% |
| <span style="background-color: #303030; width: 20px; height: 10px; display: inline-block;"></span> 10% - 20% | <span style="background-color: #a9a9a9; width: 20px; height: 10px; display: inline-block;"></span> 50% - 60% |
| <span style="background-color: #202020; width: 20px; height: 10px; display: inline-block;"></span> 20% - 30% | <span style="background-color: #d3d3d3; width: 20px; height: 10px; display: inline-block;"></span> 60% - 79% |

\*Defined as a supermarket, supercenter, or large grocery store

**Race + Ethnicity**

1 Dot = 25 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

**xxiv. Informed by community participation, any consultation with other relevant government agencies, and the PHA's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods for residents of public housing and HCV-assisted housings.**

Some census tracts in which public housing, project-based voucher properties, and voucher usage are clustered have moderate to high levels of need for parks, indicating a need for additional investment in parks, greenspace, and recreation facilities, particularly in tracts just outside of the urban core. Residents and stakeholders also emphasized that a combination of insufficient maintenance and investment in parks in lower-income neighborhoods and safety concerns in parks reduces residents' access to high-quality parks, greenspace, and recreation opportunities. The combination of uneven distribution of food outlets across the county, the substantial proportions of households with low incomes, and low levels of access to vehicles in some census tracts creates barriers to food access and security.

Policies, programs, and funding mechanisms to increase access to environmentally healthy neighborhoods for residents of public and assisted housing include:

- Increasing investment in parks in areas identified as moderate- to high-need areas that also have high numbers of residents living in public and assisted housing;
- Developing public and assisted housing in areas of the county with high levels of access to parks, fresh food, transportation, and employment;
- Assisting residents who use Housing Choice Vouchers in accessing neighborhoods with high levels of access to parks, fresh food, transportation, and employment;
- Supporting programs and funding for the development of fresh food outlets in areas of the county that are underserved by fresh food retailers and have high numbers of residents in public and assisted housing;
- Continuing to support and expand upon transportation programs that increase access to fresh food, such as the Jacksonville Transportation Authority's Door-to-Store program, a partnership between the JTA and the City of Jacksonville that provides free rides to grocery stores for residents living in the JTA's Northside ReditRide Zone; and
- Supporting programs such as job training and employment navigation that are focused on increasing residents' incomes, thus increasing residents' ability to access to fresh food and other needed resources.

### **Patterns in Disparities in Access to Opportunity**

- i. For 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 service area and region.**

Opportunity index scores by race and ethnicity and indicate that Black residents of Duval County have significantly less access to proficient schools, labor market engagement, and low-poverty neighborhoods relative to other racial and ethnic groups, and relative to white and Asian residents in particular (see Table 8). This pattern holds true for the total population and the population below the federal poverty level. Black residents below the federal poverty level have the lowest levels of access to proficient schools, labor market engagement, and low-poverty neighborhoods of all racial and ethnic groups. At the county level, there are no significant disparities by race and ethnicity for other opportunity factors, including jobs proximity, transit trips, access to low-cost transportation, and environmental health. Black and Asian residents below the poverty level have the greatest levels of access to jobs, transit trips, and low-cost transportation.

A similar pattern exists in the Jacksonville region, where Black residents also have significantly less access than other racial and ethnic groups to proficient schools, labor market engagement, and low-poverty neighborhoods (see Table 9). Among residents below the federal poverty level in the region, Black and Native American residents have significantly less access than other groups to proficient schools and low-poverty neighborhoods, and Black residents also have significantly less access to labor market engagement and environmentally healthy neighborhoods. At the regional level, as in the county, Black and Asian residents below the federal poverty level have the greatest levels of access to jobs, transit trips, and low-cost transportation.

These disparities are compounded by patterns of segregation and integration and the existence of racially and ethnically concentrated areas of poverty in the county and region. The clustering of Black residents in central Duval County and the overrepresentation of Black residents in racially and ethnically concentrated areas of poverty reflects lower levels of access to low-poverty neighborhoods and shapes access to proficient schools and engagement with the labor market.

TABLE 8: OPPORTUNITY INDICATORS BY RACE/ ETHNICITY, DUVAL COUNTY

	SCHOOL PROFICIENCY INDEX	LABOR MARKET INDEX	JOBS PROXIMITY INDEX	TRANSIT INDEX	LOW TRANSPORTATION COST INDEX	LOW POVERTY INDEX	ENVIRONMENTAL HEALTH INDEX
<b>TOTAL POPULATION</b>							
<b>White, Non-Hispanic</b>	54.98	53.98	51.56	47.06	45.87	53.16	32.09
<b>Black, Non-Hispanic</b>	30.83	29.21	48.86	50.72	48.98	29.10	27.09
<b>Hispanic</b>	48.71	47.58	51.03	48.80	48.92	45.59	31.01
<b>Asian/Pacific Islander, Non-Hispanic</b>	53.39	56.27	51.00	46.43	46.69	53.61	32.41
<b>Native American, Non- Hispanic</b>	45.78	43.02	49.42	48.24	47.18	42.07	30.52
<b>POPULATION BELOW FEDERAL POVERTY LEVEL</b>							
<b>White, Non-Hispanic</b>	46.33	44.48	54.12	49.84	49.15	42.46	30.31
<b>Black, Non-Hispanic</b>	26.35	22.85	58.04	56.99	53.46	20.30	24.10
<b>Hispanic</b>	44.31	41.71	56.23	53.96	52.66	37.35	28.84
<b>Asian/ Pacific Islander, Non-Hispanic</b>	43.47	45.46	62.87	54.95	53.59	37.41	26.84
<b>Native American, Non- Hispanic</b>	36.89	37.18	43.97	45.80	49.28	31.70	29.32

Source: HUD AFFHT Table 12, Version AFFHT0006



TABLE 9: OPPORTUNITY INDICATORS BY RACE/ ETHNICITY, JACKSONVILLE REGION

	SCHOOL PROFICIENCY INDEX	LABOR MARKET INDEX	JOBS PROXIMITY INDEX	TRANSIT INDEX	LOW TRANSPORTATION COST INDEX	LOW POVERTY INDEX	ENVIRONMENTAL HEALTH INDEX
<b>TOTAL POPULATION</b>							
<b>White, Non-Hispanic</b>	62.31	51.87	41.47	39.28	39.36	56.29	38.83
<b>Black, Non-Hispanic</b>	34.75	30.66	46.61	47.92	47.03	32.28	29.14
<b>Hispanic</b>	55.04	48.73	44.46	41.80	43.95	50.71	34.75
<b>Asian/Pacific Islander, Non-Hispanic</b>	58.40	56.87	45.29	41.25	42.92	57.09	34.68
<b>Native American, Non- Hispanic</b>	52.94	42.56	41.70	41.80	41.96	46.66	35.84
<b>POPULATION BELOW FEDERAL POVERTY LEVEL</b>							
<b>White, Non-Hispanic</b>	53.51	42.86	45.74	43.26	42.92	45.78	37.85
<b>Black, Non-Hispanic</b>	28.99	23.77	55.94	54.90	51.75	22.46	26.36
<b>Hispanic</b>	47.66	41.89	50.88	48.86	49.02	41.00	32.17
<b>Asian/ Pacific Islander, Non-Hispanic</b>	46.98	46.13	58.66	50.57	50.62	41.81	28.99
<b>Native American, Non- Hispanic</b>	37.38	34.47	40.72	47.94	46.85	31.16	32.79

Source: HUD AFFHT Table 12, Version AFFHT0006

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

Areas with high access across multiple indicators include Atlantic Beach, Jacksonville Beach, Neptune Beach, and parts of east and south Duval County. The neighborhoods surrounding downtown Jacksonville have low access across multiple indicators, including school proficiency, labor market engagement, and access to low poverty neighborhoods. Geographic disparities in these indicators are detailed below:

- Analysis of school proficiency by location across the county shows that block groups that rank highest on HUD's School Proficiency Index tend to be located in east Duval County, including Atlantic Beach, Jacksonville Beach, and Neptune Beach; southeast Duval County; and parts of north and west Jacksonville along the county line and bordering the Timucuan Ecological and Historical Preserve. Block groups that rank lowest on the index are clustered in the urban core and west Jacksonville.
- Residents of Jacksonville Beach, Atlantic Beach, southeast Jacksonville, Neptune Beach, and of the Ortega and Avondale neighborhoods (located just north of the Jacksonville Naval Air Station) tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in the urban core neighborhoods north of downtown Jacksonville.
- Residents of parts of downtown and the urban core participate in the labor force at the lowest levels, while participation tends to be highest in parts of south and east Duval County.
- Unemployment varies across the county's census tracts, ranging from less than 1% in 14 tracts in east, southeast, and west Duval County to greater than 20% in three tracts in the urban core north of downtown Jacksonville. Eight census tracts in the urban core had unemployment rates above 15% as of the 2016-2020 ACS five-year estimates.
- Median household incomes are lowest in downtown Jacksonville and the city's urban core neighborhoods, where they fall below \$25,000 in seven census tracts. Median incomes tend to be highest in parts of southeast Duval County, Jacksonville Beach, Atlantic Beach, and Neptune Beach, topping \$100,000 in 14 census tracts.
- R/ECAPs in Duval County and the region are clustered in the census tracts around downtown Jacksonville. Census tracts with the lowest poverty levels are clustered in east and south Duval County.

## ADDITIONAL INFORMATION

- i. **Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the service area and region affecting groups with other protected characteristics.**

Disparities in access to opportunity for residents with disabilities is detailed in section C of this chapter. Analysis of access to opportunity by national origin and family status did not indicate significant disparities.

- ii. **The PHA 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).**

Jacksonville Housing has taken several actions to promote access to high-opportunity areas of the county:

- **Construction of The Waves at Jacksonville Beach**, new-construction housing that is part of the RAD-PBV program. The new housing replaces 64 units of public housing with 127 RAD-PBV units.
- **Implementation of HUD-mandated Small Area Fair Market Rents (SAFMRs)**, which set voucher amounts at the neighborhood rather than metro level so that vouchers pay more in high-rent neighborhoods and less in low-rent neighborhoods. SAMFRs are designed to provide voucher holders greater access to high-opportunity areas and to make the voucher program more cost-effective.<sup>27</sup>
- **Administering additional Housing Choice Vouchers.** The agency now administers approximately 8,302 Housing Choice Vouchers.

## CONTRIBUTING FACTORS OF DISPARITIES IN ACCESS TO OPPORTUNITY

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

- i. **Access to financial services.**
- ii. **Availability, type, frequency, and reliability of public transportation.**
- iii. **Impediments to mobility.**

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<sup>27</sup> Center on Budget and Policy Priorities. (2018). A Guide to Small Area Fair Market Rents (SAFMRs). How State and Local Housing Agencies Can Expand Opportunity for Families in All Metro Areas. Retrieved from: [https://www.cbpp.org/research/housing/a-guide-to-small-area-fair-market-rents-safmrs#safmr\\_h2](https://www.cbpp.org/research/housing/a-guide-to-small-area-fair-market-rents-safmrs#safmr_h2)

- iv. Impediments to portability.**
- v. Lack of access to opportunity due to high housing costs.**
- vi. Lack of job training programs.**
- vii. Lack of local or regional cooperation.**
- viii. Lack of public and/or private investment in specific neighborhoods, including services or amenities.**
- ix. Land use and zoning laws.**
- x. Location and type of affordable housing.**
- xi. Location of employers.**
- xii. Location of environmental health hazards.**
- xiii. Location of proficient schools and school assignment policies.**
- xiv. Loss of affordable housing.**
- xv. Occupancy codes and restrictions.**
- xvi. Policies related to payment standards, FMR, and rent subsidies.**
- xvii. Source of income discrimination.**
- xviii. Other.**

Several factors contribute to disparities in access to opportunity in Duval County and the region, including high housing costs, locations of public housing, voucher payment standards that have not keep up with market rent increases, source of income discrimination by landlords, a need for public and private investment in specific neighborhoods, and the availability and frequency of public transportation in some areas of the county.

High housing costs and a lack of affordable housing in the county are primary barriers to access to opportunity. Of the top six barriers to fair housing noted by survey respondents, three are focused on a lack of affordable housing in the county (for families, individuals, and seniors). The other top barriers identified by respondents include discrimination by landlords and rental agents, displacement of residents due to rising housing costs, and location and type of affordable housing. Residents and stakeholders noted that access to opportunity is limited by high housing costs in high-opportunity areas, the location of much of the county's public housing in neighborhoods that experience underinvestment, limited acceptance of vouchers by landlords, and insufficient voucher amounts. Residents also emphasized that low frequency of

public transportation and reduced access to jobs in some of the county's high-opportunity areas make it difficult for residents without access to vehicles to live in those areas.

A lack of public and private investment in the neighborhoods north of and surrounding downtown Jacksonville, many of which are racially and ethnically concentrated areas of poverty, reduces access to opportunity in these areas in particular. Although close in proximity to downtown Jacksonville, the R/ECAP census tracts have some of the lowest numbers of jobs in the county. Low job numbers reduce access to employment for residents of these neighborhoods and indicate a lack of access to needed resources and services, such as grocery stores. Notably, in nine census tracts in Jacksonville's urban core neighborhoods, 60% to 78% of residents have low incomes and live more than one-half mile from a supermarket.



## Disproportionate Housing Needs

### ANALYSIS

- i. **Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups for the service area and region? Which groups also experience higher rates of severe housing burdens when compared to other groups?**

To assess affordability and other types of housing needs, HUD identifies four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly household income.
2. A household is *overcrowded* if there is more than 1.0 persons per room, not including kitchens or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, and a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 persons per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above) and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U.S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combinations of HUD-specified criteria, such as housing needs by race and ethnicity.

CHAS data for the city of Jacksonville, Duval County, and the Jacksonville Metropolitan Statistical Area (MSA) are provided in the tables below. As shown, there are an estimated 116,130 households in the city of Jacksonville with one or more housing problems and 58,520 households with one or more severe housing problems. More than one-third of households citywide have a housing need (34.8%) and one-sixth have a severe need (17.5%). Rates of need are similar in Duval County: there, 34.5% of households have one or more housing problems and 17.3% have a severe housing problem. In the MSA region, the incidence of housing needs is even lower (see Table 10).

Looking at need by householder race and ethnicity in Jacksonville shows that Asian or Pacific Islander households have the lowest rates of housing problems

(27.8%), while White households have the lowest rates of severe housing problems (13.8%). HUD defines a group as having a disproportionate need if its members face housing needs at a rate that is ten percentage points or more above that of the total population. Using this definition, there are two populations in Jacksonville with disproportionate needs:

- Black – 45.3% of households have a need and 23.9% have a severe need
- Latino – 41.3% of households have a need

Rates of housing need and severe need categorized by race and ethnicity are similar between Jacksonville and Duval County, with Native American households experiencing slightly higher rates of severe needs in Duval County (16.6% in Jacksonville compared to 23.2% in Duval County).

Table 10 also compares housing need rates for households by size and familial status. Small family households (under 5 people) have the lowest rate of needs (approximately 28% in the city and the county). Large families (5 or more people) are the most likely to experience a housing need, with a little under one-half in the city and county (~46%) experiencing one or more housing problems. Non-family households experience similar rates of housing needs.

Table 11 examines a specific dimension of housing need – severe cost burden. Overall, 50,035 households in Jacksonville and 52,610 households in Duval County spend more than 50% of their income on housing (15% and 14.8% of all households, respectively). In Jacksonville and Duval County, no racial or ethnic groups are disproportionately affected by severe cost burdens in comparison to White households according to HUD guidelines. However, it is worth noting that there is a disproportionate difference between the group with the lowest rate of severe cost burden in Jacksonville and Duval County (Asian or Pacific Islander households with 10.5%), and the group with the highest rate of severe cost burden (Black households with 20.5%).

In both geographies, non-family households have the highest rates of severe cost burdens (20.4% in the city and 20.2% in the county).

Overall, Black and Latino households typically experience housing problems and severe housing problems at rates that are disproportionately higher than White and Asian or Pacific Islander households. In almost all instances, households in the city of Jacksonville and Duval County have similar rates of need, severe need, and severe cost burdens, while the greater Jacksonville MSA exhibits slightly lower rates in these categories.

TABLE 10: DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Households Experiencing any of the Four Housing Problems	Jacksonville, FL			Duval County			Jacksonville MSA		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
<b>RACE AND ETHNICITY</b>									
White, Non-Hispanic	54,965	189,625	29.0%	60,065	207,790	28.9%	101,930	374,965	27.2%
Black, Non-Hispanic	44,195	97,535	45.3%	44,500	98,160	45.3%	49,550	111,970	44.3%
Hispanic	10,750	26,030	41.3%	11,190	27,000	41.4%	11,190	38,385	29.2%
Asian or Pacific Islander, Non-Hispanic	3,750	13,490	27.8%	3,810	13,845	27.5%	4,978	17,625	28.2%
Native American, Non-Hispanic	205	625	32.8%	264	680	38.8%	358	1,250	28.6%
<b>Total</b>	<b>116,130</b>	<b>333,865</b>	<b>34.8%</b>	<b>122,165</b>	<b>354,390</b>	<b>34.5%</b>	<b>175,310</b>	<b>553,920</b>	<b>31.6%</b>
<b>HOUSEHOLD TYPE AND SIZE</b>									
Family households, <5 People	52,020	183,375	28.37%	54,540	194,420	28.05%	81,940	323,365	25.34%
Family households, 5+ People	12,110	26,155	46.30%	12,325	26,725	46.12%	18,005	44,845	40.15%
Non-family households	51,990	124,330	41.82%	55,300	133,235	41.51%	75,360	185,710	40.58%
Households Experiencing any of the Four Severe Housing Problems	# with severe problems	# of households	% with severe problems	# with severe problems	# of households	% with severe problems	# with severe problems	# of households	% with severe problems
<b>RACE AND ETHNICITY</b>									
White, Non-Hispanic	26,195	189,625	13.8%	28,545	207,790	13.7%	48,279	374,965	12.9%
Black, Non-Hispanic	23,340	97,535	23.9%	23,445	98,160	23.9%	25,939	111,970	23.2%
Hispanic	5,685	26,030	21.8%	5,905	27,000	21.9%	5,905	38,385	15.4%
Asian or Pacific Islander, Non-Hispanic	2,200	13,490	16.3%	2,230	13,845	16.1%	2,859	17,625	16.2%
Native American, Non-Hispanic	104	625	16.6%	158	680	23.2%	203	1,250	16.2%
<b>Total</b>	<b>58,520</b>	<b>333,865</b>	<b>17.5%</b>	<b>61,305</b>	<b>354,390</b>	<b>17.3%</b>	<b>86,520</b>	<b>553,920</b>	<b>15.6%</b>

Source: CHAS Tables 1, 2, 4, 9

TABLE 11: DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN

Households with Severe Housing Cost Burden	Jacksonville, FL			Duval County			Jacksonville MSA		
	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden
<b>RACE AND ETHNICITY</b>									
White, Non-Hispanic	23,180	189,625	12.2%	25,385	207,790	12.2%	42,655	374,965	11.4%
Black, Non-Hispanic	20,055	97,535	20.6%	20,120	98,160	20.5%	22,445	111,970	20.0%
Hispanic	4,380	26,030	16.8%	4,585	27,000	17.0%	6,065	38,385	15.8%
Asian or Pacific Islander, Non-Hispanic	1,420	13,490	10.5%	1,450	13,845	10.5%	1,895	17,625	10.8%
Native American, Non-Hispanic	85	625	13.6%	140	680	20.6%	165	1,250	13.2%
<b>Total</b>	<b>50,035</b>	<b>333,865</b>	<b>15.0%</b>	<b>52,610</b>	<b>354,390</b>	<b>14.8%</b>	<b>74,355</b>	<b>553,930</b>	<b>13.4%</b>
<b>HOUSEHOLD TYPE AND SIZE</b>									
Family households, <5 People	21,690	186,720	11.6%	22,475	197,830	11.4%	33,561	328,300	10.2%
Family households, 5+ People	3,030	22,810	13.3%	3,140	23,320	13.5%	4,338	39,940	10.9%
Non-family households	25,320	124,335	20.4%	26,970	133,235	20.2%	36,397	185,699	19.6%

Note: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households are the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS Tables 7 & 9

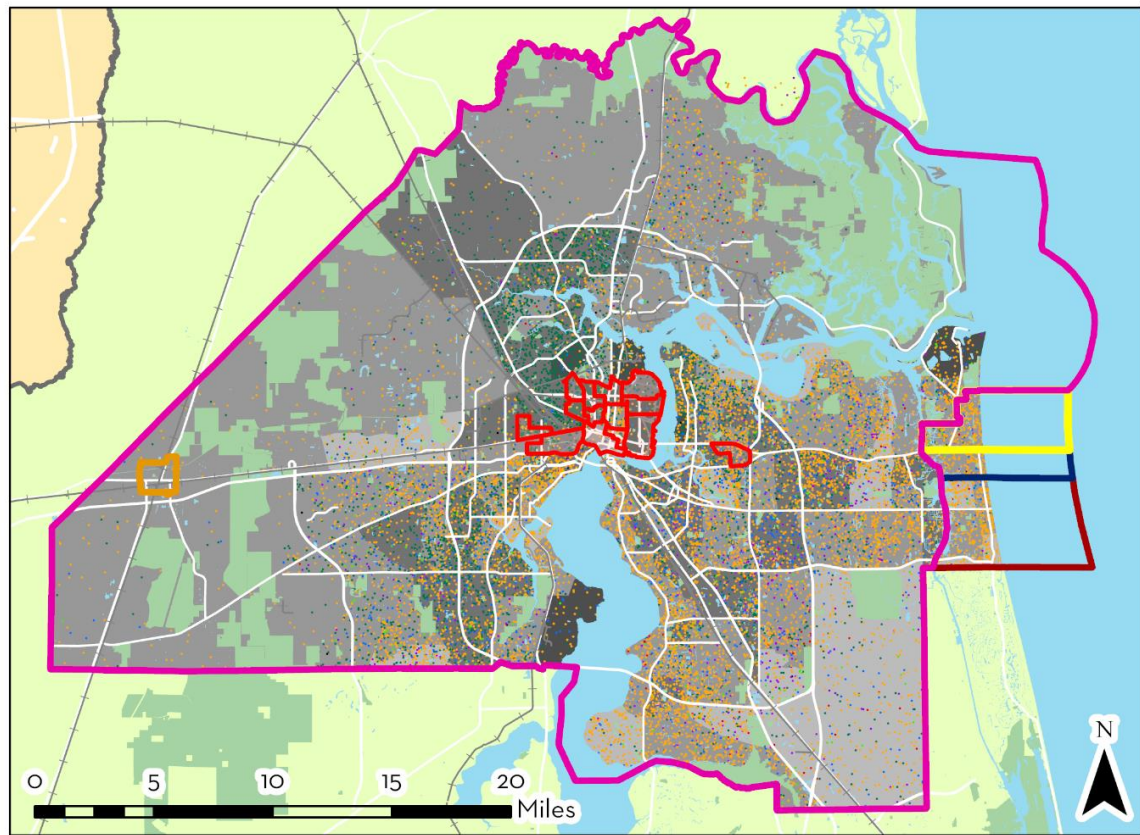
**ii. Which areas in the service area and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?**

The maps that follow show households experiencing housing problems as a share of total households by census tract for the city of Jacksonville and Duval County. As shown, housing needs are most common in downtown Jacksonville. There are several areas where more than half of households have one or more housing needs, including three R/ECAP tracts; three tracts located adjacent to R/ECAP tracts within the downtown Jacksonville cluster; and one tract in south Jacksonville, which contains the Jacksonville Naval Air Station (see Figure 47).

Black residents make up most of the population in the census tracts in north central Jacksonville bounded by US Route 23 to the west, I-295 to the north, and Main Street to the east. The tracts in Arlington and Westside Jacksonville are more integrated, with percentages of Black, white, and Latino residents that are all greater than 10%. Tracts located in the Beaches experience the lowest levels of housing needs.



FIGURE 47: PERCENT OF HOUSEHOLDS WITH AT LEAST ONE HOUSING PROBLEM



Sources: 2016-2020 ACS 5-Year Estimate Data; 2020 Census Redistricting Data; 2014-2018 CHAS Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

### Percent of Households With at Least One Housing Problem\*

- 0% - 12%
- 12% - 24%
- 24% - 36%
- 36% - 48%
- 48% - 60%

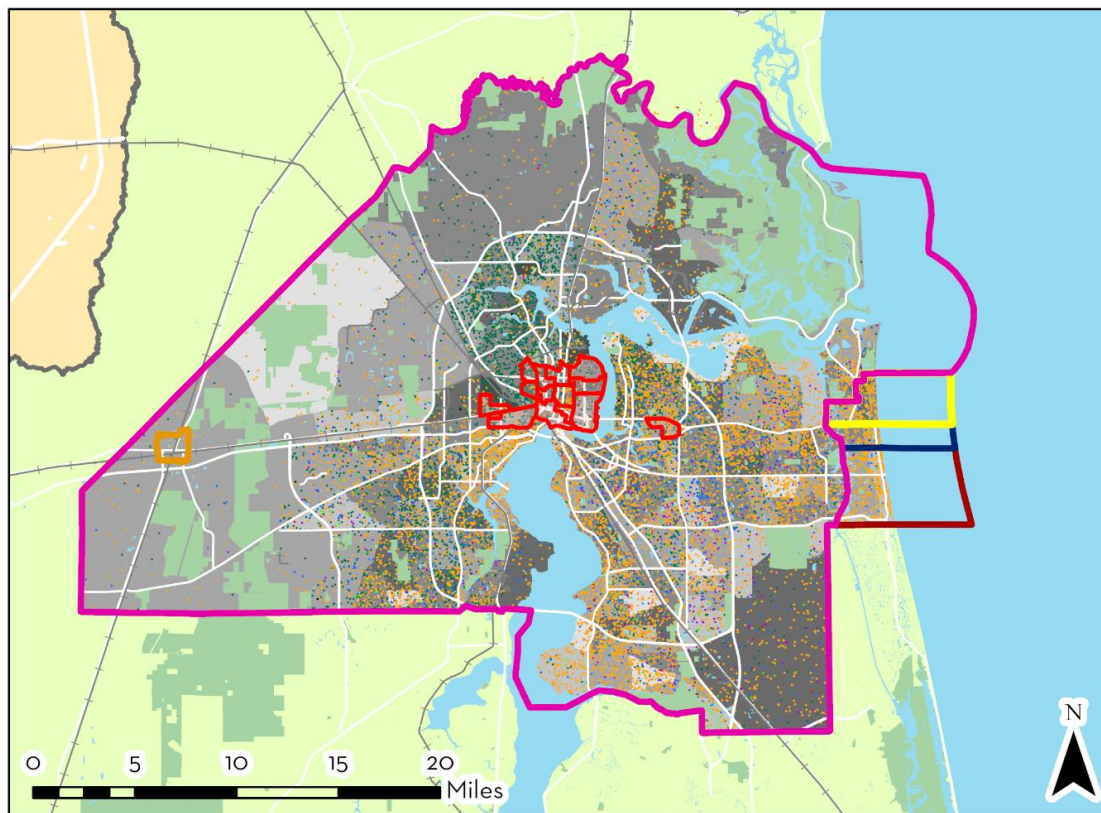
\*According to HUD, there are 4 housing unit problems: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) overcrowding; and 4) cost burden.

### Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 48: PERCENT OF RENTERS SPENDING MORE THAN 30% OF MONTHLY INCOME ON HOUSING



Sources: 2016-2020 ACS 5-Year Estimate Data; 2020 Census Redistricting Data; 2014-2018 CHAS Data

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

### Percent of Cost-Burdened Renters\*

- |  |   |
|--|---|
| <span style="background-color: lightgray; border: 1px solid black; padding: 2px;"> </span> 0% - 15%  | <span style="background-color: gray; border: 1px solid black; padding: 2px;"> </span> 45% - 60%     |
| <span style="background-color: lightgray; border: 1px solid black; padding: 2px;"> </span> 15% - 30% | <span style="background-color: darkgray; border: 1px solid black; padding: 2px;"> </span> 60% - 75% |
| <span style="background-color: gray; border: 1px solid black; padding: 2px;"> </span> 30% - 45%      | <span style="background-color: black; border: 1px solid black; padding: 2px;"> </span> 75% - 90%    |

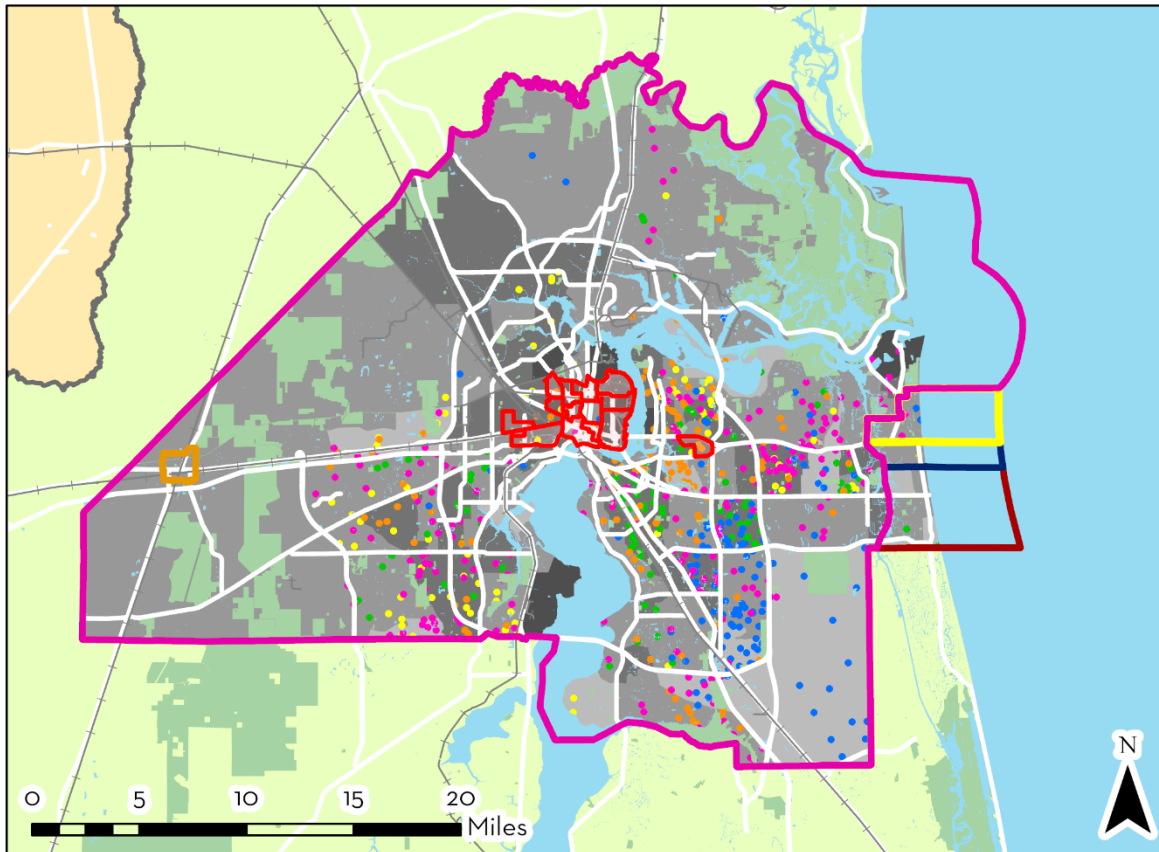
\*HUD defines cost-burdened households as those who spend more than 30% of their monthly income on housing expenses (including utilities)

### Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

FIGURE 49. HOUSEHOLDS EXPERIENCING HOUSING PROBLEMS BY NATIONAL ORIGIN



Source: 2016-2020 5-Year ACS Table B05006

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

### Percent of Households With at Least One Housing Problem\*

- 0% - 12%
- 12% - 24%
- 24% - 36%
- 36% - 48%
- 48% - 60%

\*According to HUD, there are 4 housing unit problems: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) overcrowding; and 4) cost burden.

### National Origin of Foreign-Born Population (Top 5 Most Populus) 1 Dot = 50 People

- Philippines
- India
- Cuba
- Mexico
- Haiti



**iii. 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 service area and region.**

There are 26,155 large family households (5 or more people) with a housing problem in the city of Jacksonville and an additional 570 in Duval County (see Table 12). While families with five or more people most likely include at least one child, smaller family households (up to four people) may also include children. Up to 7,600 households with children reside in public and assisted housing in Duval County (the vast majority of which are within Jacksonville). This total may include family households with a subsidy who still spend over 30% of their income on housing or have another housing need (such as overcrowding), along with households who do not have a housing problem but would otherwise face a cost burden without public assistance.

Looking at publicly supported housing by number of bedrooms, and assuming that large families would need, at minimum, a three-bedroom unit, there is currently an insufficient number of subsidized large units to house the city's large families who have a housing problem (12,110 households with problems versus 4,975 units with three or more bedrooms). This gap becomes even more prominent for families under 5 people with a housing problem, assuming they would occupy either a one- or two-bedroom unit (52,020 households with problems versus 11,471 one- and two- bedroom units). Considering that these units may also be occupied by large families without housing problems, the imbalance is likely even higher.

TABLE 12: PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: NUMBER OF BEDROOMS AND NUMBER OF CHILDREN

Housing Type	Jacksonville, FL				Duval County				Jacksonville MSA			
	Households in 0-1 Bedroom Units	Households in 2 Bedroom Units	Households in 3+ Unit Bedrooms	Households with Children	Households in 0-1 Bedroom Units	Households in 2 Bedroom Units	Households in 3+ Unit Bedrooms	Households with Children	Households in 0-1 Bedroom Units	Households in 2 Bedroom Units	Households in 3+ Unit Bedrooms	Households with Children
Public Housing	758	850	689	1,286	764	856	694	1,296	799	891	761	1,367
Project-Based Section 8	3,232	1,901	1,267	2,408	3,504	1,917	1,256	2,380	3,684	2,107	1,414	2,637
Other Family	561	0	0	0	561	0	0	0	561	0	0	0
HCV Program	1,725	2,444	3,019	3,738	1,777	2,517	3,183	3,924	1,875	2,675	3,417	4,160

Source: 2021 APSH



## ADDITIONAL INFORMATION

- i. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the service area and region affecting groups with other protected characteristics.**

Based on conversations with residents and stakeholders, there are significant barriers to homeownership in the region. Rising housing costs, subpar credit history, and a lack of savings for a down payment are among the key factors preventing residents from becoming homeowners. Homebuyer assistance programs exist but lack the capacity to support all interested households. In addition, residents receiving public assistance often live in units that are in poor physical condition, which often have problems such as inadequate insulation, plumbing issues, and rodent or other pest infestations. Housing needs for persons with disabilities will be discussed in the Disability and Access Analysis.

- ii. **The PHA may also describe other information relevant to its assessment of disproportionate housing needs and may include a PHA's overriding housing needs analysis.**

N/A

## CONTRIBUTING FACTORS OF DISPROPORTIONATE HOUSING NEEDS

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

One of the most cited issues among community members and stakeholders was an overall lack of affordable housing options in the Jacksonville region, which has become increasingly limited in the past few years. Certain neighborhoods are seen as more desirable than others due to increased perceptions of safety, cleanliness, and education/job opportunities linked to geographic patterns of investment/disinvestment. This sentiment was further supported by mapping analysis, which demonstrated that households experiencing at least one of the four HUD-defined housing problems tend to be clustered around Jacksonville's central urban core, either within or near R/ECAP tracts. Conversations with residents living in these neighborhoods revealed that issues regarding the physical conditions of housing units were frequent.

### Priority Contributing Factors

- Availability of affordable units in a range of sizes and good condition
- Lack of access to opportunity due to high housing costs

- Lack of public and/or private investment in specific neighborhoods, including services or amenities
- Loss of affordable housing
- Location and type of affordable housing
- Loss of affordable housing

### Additional Contributing Factors

- Source of income discrimination
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Community opposition
- Displacement of residents due to economic pressures
- Location of proficient schools and school assignment policies

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of quality affordable housing are well-documented. National studies have shown that affordable housing encourages diverse, mixed-income communities, which, when combined with other valuable neighborhood resources, may result in benefits such as increased academic performance, lower stress levels, and increased mental/physical health outcomes.<sup>28</sup> Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.<sup>29</sup> Developing affordable housing is also a strategy used

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<sup>28</sup> Levy, Diane K.; McDade, Zach; Bertumen, Kassie. "Mixed-Income Living: Anticipated and Realized Benefits for Low-Income Households." Urban Institute. <https://www.huduser.gov/periodicals/cityscape/vol15num2/ch1.pdf>.

<sup>29</sup> Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." Insights from Housing Policy Research, Center for Housing Policy, [www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf](http://www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf).

to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.<sup>30</sup> Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.<sup>31</sup> In Jacksonville and Duval County, previously redlined areas that have experienced long-term disinvestment are also likely to have deteriorated housing and/or lack of replacement housing. Historically disinvested areas continue to have large non-white and immigrant populations today.

### **The Impact of Land Use and Zoning on Housing Affordability and Accessibility in Jacksonville**

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Exclusionary zoning can take different forms but is understood to mean zoning regulations which impose unreasonable residential design regulations that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes and prevent overcrowding. Zoning policies that impose barriers to housing development by making developable land and construction costlier than they are inherently may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights; restrictions on the types of housing that may be constructed in certain residential zones, particularly medium density “missing middle” attached housing or higher density multi-family housing; arbitrary or antiquated historic preservation standards; minimum off-street parking requirements; restrictions against residential conversions to multi-unit buildings; lengthy permitting processes; excessive development impact or infrastructure fees; and/or restrictions on accessory dwelling units. Though not facially discriminatory, such land use regulations still may have the effect of artificially limiting the supply of housing units in a given area and disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on

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<sup>30</sup> “State of the Nation’s Housing 2015.” Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

<sup>31</sup> Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents’ Relocation in Chicago.” *Journal of Urban Affairs*, 31:5, 589-614.

fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

Jacksonville Housing Authority has the power to acquire property, develop or redevelop housing projects, demolish existing structures, construct or reconstruct projects, alter and repair improvements, etc., but all of its housing projects and development goals are subject to the same state and local planning, zoning, sanitary and building laws, ordinances, and regulations applicable to the zoning district in which the housing project is sited. Jacksonville Housing Authority projects must be consistent with the Jacksonville Comprehensive Plan and work within the confines of the zoning ordinance. JHA does not have independent authority to rezone or grant exceptions, variances, or waivers to its projects. (See ORDINANCE CODE OF THE CITY OF JACKSONVILLE, Sec. 51A.111.)

The State of Florida authorizes all counties and local municipalities to regulate land use and zoning within their respective jurisdictions through the state zoning enabling statutes. (See Fla. Stat. § 163.3161 – 163.3248). In Florida, primacy is given to the local Comprehensive Plan, which must be adopted, maintained, and implemented in compliance with Chapter 163 of the Florida Statutes, the Community Planning Act. Local zoning codes, subdivision regulations, building codes and permitting processes, and other land use and development regulations must further the policy actions of and be consistent with the jurisdiction's comprehensive plan. The Planning Act requires that all geographic areas within the state be included within the jurisdiction of a local comprehensive plan and that all development actions be consistent with the adopted plan.

In Jacksonville, the responsibility for implementing and enforcing the local zoning code, consistent with the Jacksonville Comprehensive Plan, is assigned first to the Planning and Development Department, which has the authority to interpret and enforce provisions of the Zoning Code. The Zoning Administrator is authorized to grant administrative deviations (in areas outside of the Downtown Overlay Zone) following an informal hearing. Decisions regarding rezoning requests, amendments to the zoning code, zoning exceptions, variances, and waivers are made by the City Council following advisory recommendations by the planning department and the public hearing process. The Downtown Investment Authority, which is the authorized development and community redevelopment agency for the Jacksonville Downtown Area, has authority to zone or rezone or make exceptions from building regulations within the downtown area boundaries.

The City of Jacksonville identified in its latest *Analysis of Impediments* and 2021-2025 *Consolidated Plan* several impediments to affordable housing that are directly impacted or exacerbated by zoning and land use regulations, among other causes, including: (1) a shortage of new multifamily rental development; (2) the accelerating rise in single family home prices;

and (3) a shortage of handicapped accessible housing. The Jacksonville Housing Authority does not have legislative power to override or revamp the zoning ordinance, comprehensive plan, or other planning regulations and policies but must work within its parameters. JHA can, however, work with its partners to advocate for more flexible zoning to help meet the ever-increasing demand for more affordable and accessible housing and work with the City to take advantage of recently enacted state law that gives local governments broad authority to incentivize and approve affordable housing development.

### **Impediment: Shortage of New Multifamily Rental Development**

Jacksonville's zoning code and comprehensive plan contemplate medium (up to 20 units per acre) and high density (up to 60 u/a) multifamily housing in the RMD (residential medium density) and RHD (residential high density) zoning districts and as part of mixed-use, planned unit, or transit-oriented developments in special overlay districts. However, the majority of land zoned for residential use permits only single-family detached housing at low densities (RLD) with lot sizes ranging from one acre to 4,000 sq. ft., large set back requirements, maximum lot coverage of only up to 45%, and minimum off-street parking requirements. The 2021-2025 *Consolidated Plan* reported that traditional single-family, detached homes are the most prominent housing type in Jacksonville, accounting for 60% of all housing units. Multifamily developments (5 or more units) are mostly concentrated in the urban core areas of the city and account for 24% of housing units. According to the Consolidated Plan, approximately 20% of the jurisdiction's housing units are considered "missing middle" units (2-19 units), but these too are segregated from the RLD (residential low density) zoning districts and the supply of missing middle and multifamily housing types—including duplex, townhome/rowhome, garden apartments, triplex and quadplex, etc.—is not meeting the current demand. Zoning restrictions limit housing diversity within the majority of neighborhoods, limit modest-sized and modest-priced homes, limit density and infill development, and limit conversion of large single-family homes to more affordable multi-unit or clustered housing types compatible in scale with single-family neighborhoods. A developer takes on significant risk, uncertainty, and cost to pursue rezoning or variance approvals, with a high burden of proof including a showing of undue hardship. The limited supply of land zoned for more cost-effective housing types and planned mixed-use housing and the burdens of the rezoning process impact the feasibility and ultimate affordability of developing multifamily or missing middle housing.

### **ZONING AND REGULATORY CHANGES**

The City could address how zoning regulations limit missing middle and multifamily housing types by considering proactively upzoning more corridors and acreage to zoning districts that allow a greater diversity of housing types by right, such as duplexes, multiplexes, townhomes, and rowhomes, rather than waiting on developers to seek rezoning of specific parcels.



Permitting or incentivizing conversion of large single-family dwellings in high-opportunity neighborhoods to 2-family, 3-family, or multifamily dwellings compatible with the character of surrounding homes also is a strategic way to address the need for more density and infill development in established neighborhoods. Neighborhood compatibility can be addressed with regulations focused on form and scale (such as floor area ratio and/or maximum width and depth) rather than density alone. Jurisdiction-wide upzoning that opens more neighborhoods to townhomes, duplexes, and small apartment buildings could substantially increase the supply of housing, while also making those communities financially accessible to more families. The City could also upzone more acreage to medium and high density multifamily and mixed-use zones; adopt minimum density requirements (as it has done in the transit-oriented development overlay zones of TOD-1 and TOD-2); and rezone underutilized industrial and/or commercial areas for adaptive residential use.

#### **INCLUSIONARY ZONING AND EXPEDITED APPROVALS FOR AFFORDABLE HOUSING**

Inclusionary zoning is a policy tool that a growing number of local jurisdictions have adopted in various forms to boost the production of affordable housing by requiring or encouraging housing developers to set aside a certain percentage of newly constructed dwelling units to be affordable to low- or moderate-income households (or other special needs populations such as seniors or persons with disabilities). It can be applied jurisdiction-wide or in certain neighborhoods or corridors where more affordable housing is needed and would be advantageous to fair housing planning goals. When it works well, inclusionary zoning increases the total supply of affordable housing while dispersing those affordable units into mixed-income, higher opportunity communities rather than concentrating lower-income housing in communities where entrenched problems like poverty rates, low-performing schools, and fewer job, transportation, and commercial services are available, which historically has been a struggle for state and federal housing programs like the Housing Choice Voucher Program and LIHTC program.

The City and Jacksonville Housing Authority can take advantage of statewide legislation that makes it easier for local governments to approve and incentivize affordable housing developments and adopt an inclusionary zoning ordinance. On July 1, 2020, HB 1339 came into effect with the aim of removing zoning and other hurdles such as NIMBYism to affordable housing development. Local governments may approve the development of affordable housing on *any* property zoned for residential, commercial, or industrial use regardless of comprehensive plan guidelines or zoning or other regulations in place. The state legislature updated the omnibus housing legislation (Senate Bill 962), effective June 8, 2022, by reducing the required percentage of affordable units from 100% to a minimum 10% set-aside for

commercial and industrial zoned properties, including for mixed-use development projects.<sup>32</sup> (FLA. STAT. § 125.01055 et seq. (Counties); § 166.04151 et seq. (Municipalities)). If exercised, F.S. § 125.01055 /§ 166.04151 act as a waiver for local governments to override their own comprehensive plan and/or zoning code to approve affordable housing without requiring the county commission or city council to adopt an ordinance or follow the rezoning approval process. This allows local governments more leeway to streamline review and approval of projects, including new missing middle housing and adaptive reuse of commercial/industrial buildings to residential units, without the cost and uncertainty to developers of the cumbersome public hearing process and NIMBY objections that often slow down development. Some affordable housing advocates criticize the updated bill though for reducing the required percentage of affordable units to only 10%, which may greatly reduce the amount of affordable housing that gets built. But local governments are not required to approve these developments and can craft stricter conditions for approval with a larger set-aside requirement. Another caution that housing advocates raise, is that the less regulated approval mechanism should not be misused to concentrate affordable housing where people should not be living, i.e., near toxic industrial areas, low-opportunity neighborhoods, entrenched poverty zones, or areas not served by public transportation or other public services. Local governments may decide to implement F.S. § 125.01055/§ 166.04151 by adopting an ordinance that explicitly permits and provides review criteria for its City Council to approve, approve with conditions, or reject affordable development proposals in certain zoning districts without requiring a rezoning or change of the Comprehensive Plan's Future Land Use designation. Other zoning authorities may prefer to decide each proposal on a case-by-case basis without a standardized review process, as subsection 6 of the state enabling law does not require a governing body to adopt an ordinance or regulation before using the affordable housing approval process. (F.S. § 125.01055(6)/§ 166.04151(6)).

Florida Statutes § 125.01055/§ 166.04151 also give broad authority to local county and municipal governments to adopt other affordable housing mechanisms including mandatory inclusionary zoning or linkage fee ordinances so long as the local jurisdiction provides incentives that fully offset all costs to the developer of the affordable housing contribution or linkage fee. The inclusionary zoning ordinance may require developers to provide a specified number or percentage of affordable units or as an alternative allow a developer to contribute to a housing fund or other in lieu payments. Incentives may include density or intensity bonuses; more floor space than allowed under current zoning or the comprehensive plan future land use

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<sup>32</sup> The statute requires that the sponsor of such a project must agree not to apply for or receive funding from the state's multifamily affordable housing program, known as the State Apartment Incentive Loan program.

designations; reduced or waived development fees; or other incentives. Local governments may also impose impact fees on non-affordable housing projects.

There is a menu of other incentives and development concessions that local jurisdictions can offer in exchange for income-restricted or special needs units such as: flexibility in site development standards such as setbacks, lot coverage, minimum lot size, maximum building height; expedited permit reviews; reduced parking requirements; municipal loans; tax exemptions; and variances for other development or design standards that reduce construction costs and increase efficiencies in the development of multifamily units. With the right balance, incentives like these that are substantially greater than what developers could achieve by-right under the applicable zoning district regulations could work well in Jacksonville.

Affordable housing approvals and inclusionary zoning programs should include mechanisms to protect the long-term affordability of the designated units such as deed restrictions or covenants, ground leases, and shared equity resale formulas.

#### **GIVE JHA FIRST RIGHT OF PURCHASE FOR AFFORDABLE UNITS**

Under Jacksonville's Ordinance Code, city agencies, which would include Jacksonville Housing Authority, have first right of refusal to real property that the City has acquired through escheatment or foreclosure before the property can be disposed of as surplus (by direct sale, auction, or donation).<sup>33</sup>

Jacksonville also could use this "first look" mechanism for affordable housing units approved and developed through F.S. § 166.04151(6) or through an inclusionary zoning ordinance. JHA could be granted first right of refusal to purchase a portion of the units. For example, in Montgomery County, Maryland, mandatory inclusionary zoning regulations require developers in projects with 20 or more units to set aside 12.5-15% of new dwelling units at below-market rates and allow the public housing authority to purchase a portion of the affordable units. After purchasing the units, the housing authority can use them in its own rental or financing programs for assistance to eligible low-income households.

#### **SOURCE OF INCOME PROTECTION**

Persons seeking housing whose source for rental payments and deposits may include unearned income such as a Housing Choice Voucher, veterans' benefits, child support and/or alimony support, or disability or Social Security Insurance payments may face discrimination from landlords and management companies in trying to secure housing, such as: refusal to rent to an otherwise qualified individual based on their source of income; offering different terms or

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<sup>33</sup> Jacksonville was the first city in Florida to give a community land trust an equal right of "first look" on municipal-owned real estate. The mayor spearheaded the launch of the Jacksonville Community Land Trust in July 2022.

conditions to rent to tenants using a voucher or other lawful source of unearned income; limiting access to facilities, services, repairs, or improvements because of a tenant's status as a voucher holder; or advertising preferences or limitations based on prospective tenants' source of income. Source of income is not a protected class under the FHA or Florida Fair Housing Act, however, these practices may be pretext for discrimination based on other protected demographics such as race, disability, or familial status.

As a result, a number of counties and cities in Florida—including Broward County, Miami-Dade County, Hillsborough County, Alachua County, Gainesville, and Daytona Beach—have adopted “source of income” as another protected class in their respective fair housing or tenants' rights ordinances and policies. In these communities, a housing provider may not deny housing because the prospective tenant would be paying for housing with a subsidy, public benefit, or other alternative income source. (Common exceptions include religious organizations, private owners who do not own/rent more than three dwelling units at a time, and multifamily dwellings with four or fewer units where the owner occupies one of the units.) In Charlotte, a recently adopted ordinance also bars those properties benefiting from public incentives from refusing to rent to voucher holders. Jacksonville does not currently include source of income as a protected class category, but JHA and its clients would certainly benefit from source of income protections being added to Jacksonville's Fair Housing Ordinance to help remove another barrier to fair and affordable housing choice.

### **Impediment: The Accelerating Rise in Single-Family Home Prices**

Single-family homes (which excludes row houses, townhouses, condominiums, cooperative apartments, or other forms of dwelling units which are not in individual detached buildings) are the preferred choice for many families, including families with children or persons with disabilities who need single floor dwellings and mobility adaptations. The imbalance between the demand and supply of affordable single-family housing in Jacksonville puts upward pressure on home prices. There are some development costs that local governments simply cannot control, such as materials and labor costs. However, there are other costs which zoning regulations directly impact: for example, raw land costs (via minimum lot size requirements), permitting costs, and impact fees. Jacksonville's single-family zoning districts range in size from one acre to 4,000 sq. ft. lot sizes. More of its lowest density single family districts could be upzoned to allow parcels to be subdivided for more single-family density. Implementing regulatory changes and incentives to increase missing middle and higher density multifamily housing could also ease price pressure on single-family dwellings as more housing makes it to market.

## ACCESSORY DWELLING UNITS

Florida Statutes § 163.31771 (updated in 2020 with passage of HB 1339) encourages local governments to adopt an ordinance permitting accessory dwelling units in single family residential areas to increase the availability of affordable rentals for extremely-low-income, very-low-income, low-income, or moderate-income persons. The update cut language previously requiring that the local government must first find that there is “a shortage of affordable rentals within its jurisdiction.” No such finding is required as it is generally understood that most jurisdictions in the state are facing an affordable housing crisis. The law restricts the use of ADUs to affordable rental housing (rather than being used as short-term vacation properties like an AirBnB or VRBO rental). An application for a building permit to construct an accessory dwelling unit must include an affidavit from the applicant which attests that the unit will be rented at an affordable rate to an income-eligible person or household.

Currently, Jacksonville permits detached accessory dwelling units in the RLD-TND zoning district only. But under proposed legislation introduced in June 2022, called the Keep Our Families Together Act, the City Council is considering expanding approval of ADUs to all single-family districts provided that they adhere to specific criteria, including that the unit be located behind a “conforming single-family dwelling,” possess a visual relationship to the primary residence, and not be prohibited by local homeowners’ associations. As currently drafted, the property owner also would be required to live inside the primary structure as opposed to inside the ADU or elsewhere. As the ADU ordinance is being considered, there is further opportunity to expand this type of alternative and low-impact affordable housing option by incentivizing development with programs that offer construction grants or low interest/no interest loans; assistance with the design, construction, and permitting process; and fee waivers.