

City of Racine

Analysis of Impediments to Fair Housing Choice

February 2015 Final Report



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I. Executive Summary

Purpose and Scope

The Fair Housing Act (Title VIII of the Civil Rights Act of 1968), enacted into law April 11, 1968, declares, “It is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States.” The Fair Housing Act (FHA) prohibits discrimination in the sale, rental, or financing of dwellings, and in other housing-related transactions because of race, color, religion, sex, familial status, national origin, or handicap.

FHA also directs federal agencies to administer their “programs and activities relating to housing and urban development in a manner affirmatively to further the purposes of this subchapter.” This law is repeatedly reinforced by Congress through the Housing and Community Development Act of 1974, the Affordable Housing Act, and in the Quality Housing and Work Responsibility Act of 1998, which requires recipients of HUD Community Planning and Development (CPD) funds to certify that they will affirmatively further fair housing (AFFH).

AFFH certification obligates recipients of Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds to do more than simply not discriminate. It obligates recipients to take further steps to address segregation and related barriers for those protected by the FHA.

States and communities that receive HUD CPD funds through a formula allocation and not a competitive process are termed, “entitlement jurisdictions.” The City of Racine is an entitlement jurisdiction that receives HUD CPD funds from the CDBG, HOME, and ESG programs. The City submits an annual AFFH certification to HUD to. These efforts are then documented in the City’s Five-Year Consolidated Plan and in the Comprehensive Annual Performance Evaluation Reports (CAPER). The AFFH certification has three components:

- Complete an *Analysis of Impediments to Fair Housing Choice* (AI)
- Take actions to overcome the effects of any impediments identified through the AI, and
- Maintain records reflecting analysis and actions taken.

The *Fair Housing Planning Guide* published by HUD notes that impediments to fair housing choice are:

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”

The City of Racine Analysis of Impediments to Fair Housing Choice (CRAI) explores barriers to housing in the City of Racine, Wisconsin. It is part of the effort by the City of Racine to “affirmatively further fair housing choice”, as required by HUD. This plan has been developed by the City of Racine Fair Housing Division (RFHD) that is located in within the City of Racine Department of City Development. RFHD provides fair housing services within the municipal boundaries of the City of Racine. Funding for this study was provided entirely by the City of Racine through its CDBG Program.

The AI, as first step of the AFFH certification, involves a thorough examination of a variety of sources related to housing: the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and identified impediments, along with suggested actions to overcome identified impediments.

The purpose of the AI is to enable the City of Racine to:

- Identify and eliminate housing discrimination in the City of Racine
- Promote fair housing choice for all City of Racine residents
- Develop opportunities for inclusion of protected classes in housing occupancy, and
- Foster compliance with the non-discrimination provision of the FHA.

The scope of the study includes the following analyses:

- A review of housing-related policies that impact fair housing choice in the City of Racine including the municipal zoning code, building code, comprehensive plan, regional housing plan, consolidated plan, etc.
- A review of housing-related programs that impact fair housing choice in the City of Racine including CDBG, HOME, ESG, and non-federal funds administered by the City of Racine
- A review of housing options within the City of Racine
- A review of demographic characteristics of the City of Racine in the context of Southeastern Wisconsin
- A review of fair housing laws and protected classes
- A review of fair housing complaints including national and local statistics and an overview of agencies and regulations governing fair housing
- A summary of responses to public surveys, interviews, and a focus group, and
- Conclusions and recommendations regarding strategies for reducing barriers to obtaining fair housing and improving the environment to enhance the ability to obtain safe and stable housing in the City of Racine.

Impediments to Fair Housing Choice

The following CRAI document was created to identify impediments to fair housing choice. There are direct and indirect impacts on fair housing choice. Direct impacts to barriers to affordable housing are those that include *direct* discriminatory actions, omissions, or decisions related to membership in a protected class, or *indirect* actions, omissions, or decisions that *have the effect of restricting housing choices* for people specifically because of their protected class memberships.

Direct Impediments

1. Racine Code of Ordinances Chapter 62 Human Relations II-B should be expanded to include the following protected classes: ancestry, marital status, and status as a victim of domestic abuse, sexual abuse or stalking. Exceptions to Chapter 62 Article II should also include those that provide for solely disabled housing. (direct)
2. RFHD's funding has decreased in recent years, which has affected its visibility in the community. (direct)

3. The Affirmative Action/Human Rights Commission (AAHRC) is not fully engaged in the fair housing complaint process. It appears to need additional education and training in fair housing discrimination laws and improved communication from staff on fair housing complaints and their disposition. (direct)
4. Housing Choice Voucher holders are likely to be concentrated in the central and eastern portions of the City, which are previously established neighborhoods with high concentrations of poverty, minority and disabled populations. Eighty-eight percent of voucher holders identify as minority and on average earn \$12,800 per annum. (indirect/direct)
5. Similarly, project-based assistance at multifamily projects are concentrated in the central portion of the City. Nearly 49% of tenants at these properties identify as being minority and have an income of roughly \$11,400 per annum. (direct)
6. The Home Mortgage Disclosure Act data for the City of Racine show a significant disproportion in the number of minority applications submitted and the rates of denied applications. Black/African American and Hispanic/Latino applicants are less likely to apply for loans and have higher rates of denial. These outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear whether these outcomes are the result of bias and discrimination (direct) or simply less comfort, knowledge, and creditworthiness. (indirect)
7. Historically, rates of foreclosure have been higher in Racine than the Region and State. Higher rates of foreclosure were concentrated in higher minority, lower income neighborhoods with high costs mortgages. (direct)
8. The number of elderly and disabled individuals is projected to increase in the City of Racine and the Region. A greater demand for accessible housing is expected. Presently there are 12,157 persons with disabilities in the City of Racine and up to 9,235 accessible units available in Racine County. (direct)
9. Homelessness nearly equally affects Black/African American and White individuals, but disproportionately affects unaccompanied men and those individuals with disabilities. There appears to be a need for additional resources for unaccompanied and accompanied men, as well as those with disabilities. The unmet needs include shelter and connection to employment services, but not necessarily workforce development services, as education attainment is relatively high (48% with high school diplomas; 23% with college experience/degrees). (direct)
10. City of Racine minority and disabled populations earn less than the median annual earnings and rely more on public transit to get to and from employment opportunities that are typically not available in concentrated poverty neighborhoods. (direct)

Indirect Impediments

11. While housing cost is lower in the City of Racine than the Region for both owner-occupied and renter-occupied housing, 34.4% of homeowners and 56% of renters are paying more than 30% of their gross household income towards housing costs. Small households with two to four related family members appear to be the most affected in the renter-occupied housing while small-related households and the elderly are most affected in owner-occupied housing. (indirect)
12. While not as segregated as some Southeastern Wisconsin communities there are concentrations of racial and ethnic minorities in central and eastern sections of the City. (indirect)
13. The disabled and elderly populations are represented throughout the City, but mostly concentrated in central Racine. (indirect)
14. Areas with high concentrations of poverty are located in central and eastern sections of the City. (indirect)
15. Areas of predominantly poor, minority, elderly and disabled populations live in the oldest housing stock in central Racine. (indirect)

16. Areas with concentrations of poverty along with high concentrations of minority and disabled populations are disproportionately affected by food insecurity. (indirect)
17. Minority households, particularly Black/African American households, have low rates of homeownership. While this is consistent with the Region, it is an impediment to fair housing choice. (indirect)
18. The City of Racine has potential for overcrowding in its multifamily dwellings that are occupied by low-income householders. (indirect)
19. Vacancy rates increased to nearly 10% from 2000 to 2010; this is higher than the recommended vacancy rates for a healthy housing market. (indirect)
20. The Home Mortgage Disclosure Act data for the City of Racine show a significant disproportion in the number of minority applications submitted and the rates of denied applications. Black/African American and Hispanic/Latino applicants are less likely to apply for loans and have higher rates of denial. These outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear whether these outcomes are the result of bias and discrimination (direct impediment) or simply less comfort, knowledge, and creditworthiness. (indirect)
21. In Racine County, the total available number of government assisted units is 4,130 and there is a demand for approximately 12,817 units. (indirect)

No Impediment

22. Compared to the Region, the City of Racine shows no jobs-housing imbalance in terms of affordable housing options for its low-to-moderate income workforce. (no impediment)
23. When the City of Racine's Comprehensive Plan, zoning code, and building code are examined in context with the *Southeastern Wisconsin Regional Housing Plan: 2035* there are no apparent conflicts with recommendations regarding affordable housing recommendations. (no impediments)
24. It appears the various plans utilized by the Racine entities (City, Housing Authority of Racine County (HARC), and CoC) affirmatively further fair housing choice by increasing the supply of affordable housing options and their combined efforts to raise the wages of low- to moderate-income individuals. (no impediments)

Recommendations

The identified impediments to fair housing choice can be categorized into several categories: Affordable Housing, Fair Housing, Jobs/Housing Balance, Accessible Housing, Government Assisted Housing and Housing Development Practices. Some recommendations are regional in scope and may overlap with recommendations made by the *Regional Housing Plan of Southeastern Wisconsin: 2035*; other recommendations apply locally to Racine. Recommendations for each impediment category are presented below:

Affordable Housing

1. Racine's housing market has a large employment base and a large percentage of households with housing problems such as high housing cost burden. Increasing access to good-paying jobs through workforce development, transit as well as affordable housing may be necessary to reduce housing problems.
2. Focus on existing City programs such as property maintenance ordinances, repair/rehabilitation loans, energy-efficiency, and lead paint abatement programs to maintain existing housing stock. Increase usage of CDBG to make home repairs. Provide funds to assist landlords in making needed repairs to rental property.

3. Increase homeownership opportunities through continued usage of City of Racine housing loan programs into opportunities for disabled persons and minority populations, particularly Black/African American households. Seek out opportunities to partner with organizations such as National Alliance on the Mental Illness (NAMI), Society's Assets, CHDOs, HARC, Realtor's Association, etc.
4. The City, along with the CoC for Racine and Racine County, should investigate the development of supportive housing for the homeless. The City recommends that the Housing First approach be adopted. The Housing First approach addresses the need for housing first and then addresses the need for additional supportive services such as healthcare, education, employment, etc. to better get at the root causes of homelessness in the City of Racine.
5. The City, along with the HARC, should discuss the implementation of a homelessness preference in the Housing Choice Voucher Program administered by HARC to address the causes of homelessness in the City of Racine.

Fair Housing

6. Investigate the creation of a Housing Counselor/Fair Housing Program Manager in the City of Racine Department of City Development dedicated to homeownership counseling, foreclosure counseling, and fair housing advocacy and education. Possible sources of funding are CDBG and HOME funds as well as income from various housing loan funds.
7. Revise Section 62 of the City of Racine Municipal Ordinance to include ancestry and status as victim of domestic violence, sexual abuse or stalking as protected classes and expand the exception for solely disabled housing.
8. Maintain funding for RFHD to increase awareness of fair housing rights and anti-discrimination laws.
9. Increase visibility of the RFHD through targeted marketing and a more concerted push for community education.
10. Develop a more comprehensive monitoring checklist for CDBG, HOME, and ESG programs to include fair housing compliance areas.
11. Increase fair housing testing efforts in the community. It is suggested to develop a regular three to five year schedule and use an outside entity for fair housing discrimination testing.
12. Increase participation of the AAHRC in the fair housing complaint process. Provide annual education on fair housing to the AAHRC. Improve the monthly report submitted to the AAHRC to include a summary report tracking fair housing discrimination cases.

Jobs/Housing Balance

13. Promote job/housing balance; include the development of affordable housing in areas with sewer service outside central cities and improve transit service to increase access to jobs, education and job training. Increase economic development in areas with high unemployment, underemployment, and discouraged workers.
14. Expand public transportation to fully implement the 2035 Regional Transportation System Plan to maintain a jobs/housing balance.

Accessible Housing

15. Support universal design and visitability to increase accessible housing stock for persons with disabilities.
16. Analyze the American Housing Survey and U.S.Census data to estimate the number of accessible housing units in the community to help ensure that there are plentiful housing options for persons with mobility disabilities. Prioritize accessibility remodeling with funding from sources such as CDBG, HOME, Tax Increment Financing (TIF) extensions, and other sources.
17. Local government code enforcement officers and building inspectors should receive training on the accessibility requirements of State and Federal fair housing laws with regard to multifamily housing construction and rehabilitation.
18. Support funding for accessibility modifications for renters. Modify programs to allow renters and landlords to use funding sources for accessibility improvements that are available to homeowners, in consultation with the property owner as provided in fair housing laws.

Government Assisted Housing

19. Support Federal initiatives to simplify subsidized housing programs to make more efficient use of resources. Public Housing Authorities (PHAs) and entitlement jurisdictions should continue working with Federal agencies and Congress to maintain funding levels for housing and related programs.
20. Continue to work with Federal agencies and Congress to increase funding levels for additional housing vouchers to help meet the demand for housing assistance in the Region. There are 45,676 housing choice vouchers and subsidized housing units in the Region, compared to a potential need for 187,395 vouchers to help provide housing for 100,111 extremely-low income households and an additional 87,284 very-low income households.
21. Support HUD rehabilitation or replacement of existing subsidized public housing units.
22. Support the establishment of a regional Housing Trust Fund for Southeastern Wisconsin (HTF-SW) with a focus on county-specific policy goals to help achieve the objectives of the regional plan, e.g., to assist in the acquisition of land and development of affordable housing.
23. CoC organizations should expand partnerships with employment services involved in efforts to prevent homelessness.

Housing Development Practices

24. Continue using detailed neighborhood plans for each residential neighborhood or special planning district where significant urban development or redevelopment is expected.
25. Continue to promote the redevelopment and infill of vacant and underutilized sites, including the cleanup and reuse of brownfields, as a key element in planning for the revitalization of urban areas.

II. Introduction and Methodology

Introduction

Within a little more than a generation, the United States is poised to become a nation where traditional minorities are in the majority. Currently, non-White Hispanic/Latino and those identifying as a combination of races account for more than a third of the United States population. For the first time in United States history, minority populations will be the majority in public schools in 2014.ⁱ Additionally, the population of the United States is aging. The largest cohort in United States history, the baby boomer generation (1946-1964), began to retire in 2010.ⁱⁱ Disability prevalence is rising in the under age-65 population and will begin to rise sharply as the senior population doubles over the next 20 years.ⁱⁱⁱ Historic patterns of housing discrimination in these populations persist today.

In the 1970s, HUD began to track trends in racial and ethnic housing discrimination. Since this time, HUD has completed four such studies – 1977, 1989, 2000, and 2012. What HUD’s research has found is blatant “door-slammings” racial and ethnic housing discrimination (refusing to meet with or provide information about available units to a minority home-seeker) has become rare, but “discrimination with a smile,” or more subtle discrimination (providing information about fewer units) persists, raising housing search costs and limiting housing choice options.^{iv} This shift has also been shown to occur in the lending arena. Discrimination has shifted from credit denial into access to credit on unequal terms. Studies on mortgage credit availability and terms show evidence of discrimination against minorities compared to similarly qualified White borrowers.^v

Closely related to race and ethnicity discrimination, national origin discrimination also appears to be prevalent. In fiscal year 2011, 13 percent of the complaints received by HUD and similar fair housing enforcement organizations were for national origin. A recent study on national origin discrimination was completed in the Birmingham and San Antonio markets. It found Hispanic/Latino home seekers received adverse treatment 42 percent of the time.^{vi}

While less research has been done on the incidence of discrimination against persons with disabilities, the number of complaints received by HUD and similar local fair housing enforcement organizations represented nearly 50 percent of the total complaints in 2011.^{vii} A 2005 study in Chicago found that one out of four wheelchair-bound apartment seekers learned about fewer units and three out of ten were denied the opportunity to inspect available units. Nearly one in six landlords refused to allow reasonable accommodations (widening a doorway, installing a ramp). Another one in five refused to provide handicap parking.^{viii}

Ongoing discrimination in the housing market limits housing choices and reinforces segregation.^{ix} Even if discrimination were not persistent in today’s market, historic patterns of segregation would be somewhat self-perpetuating. Due to historic unequal access to education and employment opportunities and less benefit from the wealth accumulation of suburban homeownership, minorities are less likely, even today, to have the financial resources to choose residential options in less segregated, lower-poverty neighborhoods.^x

Over the past four decades, income, resources, and amenities increasingly have been concentrated in affluent neighborhoods whereas minority neighborhoods have become areas of concentrated poverty.^{xi} Of census tracts where more than 40 percent of the population is below the federal poverty line, 78 percent are predominately inhabited by minority populations.^{xii} These high-poverty and resource deprived neighborhoods have numerous adverse outcomes for their residents including: less access to job opportunities, lower

educational attainment, higher infant and adult mortality, lower environmental quality, reduced access to primary healthcare services, and increased crime victimization.^{xiii} Equally affected are persons with disabilities who have been subject to segregation, institutionalization and otherwise limited equal access to housing choices resulting in lower educational attainment and higher poverty rates.^{xiv}

Persistent segregation has costs that are borne by society as whole. The effect of negative health, employment and crime burdens the public health, welfare, and the criminal justice systems.^{xv} Lack of access to education and employment result in an underdeveloped workforce, which reduces the productivity of regional economies.^{xvi} Recent research concludes that racial segregation negatively affects economic growth in both cities and suburbs.^{xvii}

In light of this broad body of research, the City of Racine's AI examines ways to eliminate housing discrimination in the City of Racine, promote fair housing choice for all City of Racine residents, develop opportunities for inclusion of protected classes in housing occupancy and foster compliance with the non-discrimination provisions of the Fair Housing Act.

Methodology

The CRAI evaluates demographic, housing and economic characteristics of Racine. This evaluation includes: demographic review of population and household growth trends, age distribution, income by age of householder, race and ethnicity, poverty by race, ethnicity and disability status, minority concentrations, dissimilarity indices, employment by industry sector, housing distribution by type, housing tenure by race and ethnicity, and condition of the current housing stock. Additionally, the CRAI reviews information on fair housing complaints including national, regional and local statistics.

Housing-related programs and policies that affect fair housing choice are examined. Policies reviewed include the municipal zoning code, building code, comprehensive plan, regional housing plan, consolidated plan, and others. Programs reviewed include CDBG, HOME, ESG, and other non-federal funds administered by the City of Racine.

This report includes primary and secondary research. Primary research includes interviews, surveys, and a focus group with landlords, lenders, realtors, non-profit housing service providers, City employees and officials as well as City residents. Secondary research is credited to the source when used and includes data from the U.S. Census, American Community Survey (ACS), Comprehensive Housing Affordability Study (CHAS), State of Wisconsin, Southeastern Wisconsin Regional Planning Commission (SEWRPC), and/or the City of Racine. Secondary research is used as a basis for the analysis and is reviewed for other factors that may impact results.

Study Area

The CRAI analyzes the City of Racine in the context of Racine County, Southeastern Wisconsin, and the State of Wisconsin. Evaluating these additional geographies against the City of Racine allows trends present at the local level to be further evaluated against baseline statistics.

Much of the baseline data on the Southeastern Wisconsin Region is from the *Regional Housing Plan for Southeastern Wisconsin: 2035*. The City of Racine endorsed this plan as guide for regional and community development by Resolution 13-0339 on September 17, 2013.

Overview – City of Racine

The City of Racine is an industrial city, port of entry and the seat of Racine County. It is located in the central southeastern section of this region, south of Milwaukee County and north of Kenosha County on the shores of Lake Michigan at the mouth of the Root River. Racine is the fifth largest city in Wisconsin; forty percent of Racine County residents live in the City. Racine County is bisected by Interstate-94 which links it to Milwaukee, Madison, and Minneapolis to the West and Chicago and Detroit to the East.

The City of Racine is located in the seven-county region known as Southeastern Wisconsin. The seven counties included are: Kenosha, Milwaukee, Ozaukee, Walworth, Washington, Waukesha, and Racine.

A Regional Housing Plan for Southeastern Wisconsin: 2035

In 2009, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) undertook the development of the first regional housing plan since 1968. The *Regional Housing Plan* is an extension of the *Regional Comprehensive Plan for Southeastern Wisconsin*, which was adopted in June of 2006. This 900-page document provides a comprehensive review of the seven-county region of Southeastern Wisconsin. The plan 1) compiles detailed data affecting the provision of housing in the Region, 2) identifies housing needs in the Region, and 3) presents a housing plan to effectively meet current and probable future housing needs of all income levels and age groups and persons with disabilities in the Region. The plan offers a detailed look at the City of Racine in the context of Southeastern Wisconsin. The regional information presented in this plan is presented throughout this document, courtesy of SEWRPC. The recommendations for sewered communities, such as the City of Racine, are included in Table 1.

Table 1: Regional Housing Plan for Southeastern Wisconsin: 2035**Affordable Housing**

1. Housing unit size and density: 1) allow home sizes less than 1,200 square feet, 2) provide areas for the development of multi-family housing at a density of at least 10 units per acre, and 3) 18 units or more per acre in highly urbanized communities, to accommodate the development of housing affordable to lower-income households.
2. Reduce or waive impact fees for new single- and multi-family development that meets the affordability threshold for lot and home size, in accordance with Section 66.0617(7) of the *Wisconsin Statutes*.
3. Encourage a variety of housing types in urban neighborhoods including apartments, townhomes, duplexes, small single-family homes and lots, and live-work units. Utilize flexible zoning regulations intended to encourage a mix of housing types, such as planned unit development (PUD), traditional neighborhood developments (TND), density bonuses for affordable housing, and adaptive re-use of buildings. Accessory dwellings should be considered.
4. Review requirements that apply to new housing development to determine if changes could be made that would reduce the cost of development without compromising the safety, functionality, and aesthetic quality of new development
5. Include architects on municipal design review teams.
6. Use TIF to facilitate the development of affordable housing as allowed by Section 66.1105 (6)(g) of the *Wisconsin State Statutes*.
7. Consider programs to maintain existing housing stock such property maintenance ordinances, weatherization and lead paint abatement programs, and use of CDBG and other funding to assist LMI households to make home repairs. Provide funds to assist landlords in making needed repairs to apartments.

Fair Housing

1. Multi-family housing and smaller lot and home size requirements for single-family homes may accommodate new housing that would be more affordable to low-income households. A significantly higher percentage of minority households have low incomes compared to non-minority households. Communities should evaluate plans and policies to determine if their plans and regulations act to affirmatively further fair housing.
2. Allow multi-family as a principal use in zoning ordinances.
3. Require sub-recipients of CDBG and HOME funds to certify that they will affirmatively further fair housing.
4. Maintain funding for fair housing organizations that increase awareness of fair housing rights and anti-discrimination laws and assessing the procedures used by agencies charged with administration and enforcement of housing laws.

Jobs/Housing Balance

26. Conduct, if applicable, a job/housing balance analyses to assess if 1) additional lower-cost multi-family housing units, should be provided, and/or 2) additional moderate-cost single-family housing units, should be provided.
27. Expand public transportation to fully implement the 2035 regional transportation system plan to maintain a jobs/housing balance.
28. Promote job/housing balance: include the development of affordable housing in areas with sewer service outside central cities and improved transit service to increase access to jobs, education and job training; and increased economic development in areas with high unemployment, underemployment, and discouraged workers.
29. Establish revised selection criteria for transportation projects using Surface Transportation Program – Urban Area funding or Congestion Mitigation and Air Quality Program funding.

Accessible Housing

30. Communities with sanitary sewer service and that have household income/housing and/or a job/housing imbalance should provide for multi-family housing.
31. Local governments should support universal design and visitability to increase accessible housing stock for persons with disabilities.
32. Analyze the American Housing Survey and census data to estimate the number of accessible housing units in the community to help ensure that there are plentiful housing options for persons with mobility disabilities. Municipalities should prioritize accessibility remodeling with funding from sources such as CDBG, HOME, TIF extensions, and other sources.
33. Local government code enforcement officers and building inspectors should receive training on the accessibility requirements of State and Federal fair housing laws with regard to multi-family housing construction and rehabilitation.
34. Support funding for accessibility modifications for renters. Modify programs to allow renters and landlords to use funding sources for accessibility improvements that are available to homeowners, in consultation with the property owner as provided in Fair Housing laws.

Subsidized and Tax Credit Housing

1. Support Federal initiatives to simplify subsidized housing programs to make more efficient use of resources. Public Housing Authorities (PHAs) and entitlement jurisdictions should continue working with Federal agencies and Congress to maintain funding levels for housing and related programs.
2. Continue to work with Federal agencies and Congress to increase funding levels for additional housing vouchers to help meet the demand for housing assistance in the Region. There are 45,676 housing choice vouchers and subsidized housing units in the Region, compared to a potential need for 187,395 vouchers to help provide housing for 100,111 extremely-low income households and an additional 87,284 very-low income households.
3. Communities with major employment centers should seek and support new multi-family housing development using LIHTC and other available funds to provide workforce housing for households earning 50 to 60 percent of the Region's median annual household income.
4. Support HUD rehabilitation or replacement of existing subsidized public housing units housing.
5. Establish a regional Housing Trust Fund for Southeastern Wisconsin (HTF-SW) with a focus on county-specific policy goals that will help achieve the objectives of the regional plan, e.g., to assist in the acquisition of land and development of affordable housing.
6. Continuum of Care (CoC) organizations should expand partners involved in their efforts to prevent homelessness.

Housing Development Practices

1. Local governments should consider preparing detailed neighborhood plans for each residential neighborhood or special planning district where significant urban development or redevelopment is expected.
2. Develop design standards to achieve communities and neighborhoods that are functional, safe, and attractive ultimately depend on good design of individual development and redevelopment sites.
3. Promote the redevelopment and infill of vacant and underutilized sites, including the cleanup and reuse of brownfields, as a key element in planning for the revitalization of urban areas.
4. Local governments, PHAs, and developers should consider Crime Prevention through Environmental Design (CPTED) elements when developing and reviewing site plans for proposed housing developments.

III. Demographic Profile

Population

From 1950 to 2010, the Southeastern Wisconsin Region grew from approximately 1.2 million to 2.02 million people, a 59 percent increase. Milwaukee County has the largest concentration of population in Southeast Wisconsin, representing 47 percent of the population in 2010. However, Milwaukee County represented 70 percent of the Region's population in 1950. Much of the population growth in the Region has been in Waukesha County. In 1950, Waukesha County represented approximately 7% of the Region's population; in 2010, it represented approximately 19% of the Region's population. Racine County largely remained steady in its representation of the Region's population growth. It represented 8.8% of the population in 1950 and 9.7% of the Region's population in 2010.^{xviii}

The population of the City of Racine decreased from about 95,160 persons in 1970 to 85,725 persons in 1980, 84,300 persons in 1990, 81,860 persons in 2000 and 78,850 in 2010. This represents an overall decrease of 16,310 persons, or 17 percent, over 40 years. This compares to increases of 12 percent, 13 percent, and 22 percent in the population of Racine County, the Southeastern Wisconsin Region, and the State, respectively, during this time. In comparison, the population of Racine County has increased 3.5% and the Southeastern Wisconsin Region is estimated to have increased by 4.6 percent between 2000 and 2010. The State population increased by 6.0 percent during that same time period.^{xix}

The Federal 2008-2012 American Community Survey (ACS) provides information about basic population characteristics, such as age, race, and educational attainment. Information regarding the characteristics of the population of the City of Racine, drawn from the 2010 census, is presented below:

- The age composition of the population of the City of Racine is significantly younger than that of Racine County, the Southeastern Wisconsin Region and the State overall. Persons under 20 years of age—including much of the pre-school and school age population—numbered 24,235 in 2010, representing 31% of the City population. Persons between the ages 20 and 64—including much of the workforce age population—numbered 46,029, or 58% of the total. Persons 65 years of age and over numbered 8,500, or 11% of the total. The City median age of 31.6 years was lower than that of the County (39.0 years), the Southeastern Wisconsin Region (37.0 years), and the State (38.5 years).
- As part of the 2010 census, respondents were given the opportunity to specify more than one race when reporting their racial identity. The vast majority of the City population (96 percent) reported only one race. This includes 61.8% reporting White; 22.6% reporting Black/African American; 0.5% reporting American Indian/Alaska native; 0.8% reporting Asian; and, 10.3% reporting some other race. In comparison, 79.7% of the population of Racine County, 76.0% of the population of the Southeastern Wisconsin Region, and 86.2% of the population of the State reported their race as White.

Quick Facts

78,850	population of Racine
30,050	households in Racine
38.2%	% Racial Minority
20.7%	% Hispanic/Latino
13.2%	% Disabled
\$20,079	per capita income
18.5%	individuals below poverty
21.5%	families below poverty
34.4%	home-owner costs exceeding affordability
56.9%	renter costs exceeding affordability

- The Federal census includes questions on Hispanic/Latino ethnicity independent of questions on race. In the 2010 census, 20.7% of the total City population, or 16,309 City residents, were identified as Hispanic/Latino. This is higher than the proportion of Hispanic/Latino population in the County (11.5%) and the Southeastern Wisconsin Region (9.9%) and significantly higher than the proportion for the State (5.9%). In 2010, about 72% of the Hispanic/Latino population in the County was located in the City of Racine.
- The educational attainment level provides an indicator of the earning potential of the population and of the type of occupations the City workforce is most suited to fill. The educational attainment level of the City population is somewhat lower than that of Racine County, the Southeastern Wisconsin Region, and the State. As reported in the 2008-2012 ACS, a higher percentage of the City's population 18 to 24 years of age are without a high school education or GED (25.3%), than that for Racine County (21 %), Wisconsin (13%), or the U.S. (16.2%). The City rate is also higher than the City of Milwaukee (16.2%). Within the City of Racine, 31.4% of the male population in this age group had not attained a high school education or GED equivalent. Correspondingly, a relatively low 31% of persons of the City's population age 18 to 24 had not attained some college education or received an associate's degree. For the older population segment, about 82.2% of the City population age 25 years and over had attained a high school or higher level of education—six percentage points less than Racine County, and eight percentage points lower than the State. Just fewer than 17% of the City population age 25 years and over had a bachelor's degree or graduate degree, compared to nearly 23% for the County, and just over 30% for the State.

SEWRPC Population Projections

The Southeastern Wisconsin Regional Planning Commission (SEWRPC) intermediate population projection envisions that there will be relatively stable birth rates and a modest increase in life expectancy in the City of Racine, Racine County, and the Region in the coming decades. The intermediate projection also envisions that the City of Racine, Racine County and the Region would experience a relatively stable migration pattern, similar to that which is estimated to have occurred during the early 2000s. The migration assumptions for the intermediate projection reflect the conclusion—from a concurrent SEWRPC economic study—that, overall, the economy of the Region would not likely significantly increase or decrease in strength relative to other areas of the State or Nation.

Under the SEWRPC intermediate projection, the City population would decrease by 1,340 persons, or 2 percent, over the 35-year projection period, from 81,850 persons in 2000 to 80,510 persons in 2035. The decrease in population is generally attributable to the continuing decrease in household sizes. SEWRPC projections indicate that changes may be expected in the age composition of the population in the coming decades. Particularly noteworthy is the expected influence of the large baby-boom generation on the future age structure. By 2030, all baby-boomers will be 65 years of age or older. Persons age 65 and over would account for 20% of the County population in 2035, compared to 11% in 2010. Changes in age composition of the population may be expected to have many impacts, ranging from impacts on housing needs to impacts on the available labor force, particularly as baby-boomers move into their retirement years.

Households

In addition to population data, household data is also analyzed. A household includes all persons who occupy a housing unit. A housing unit is defined by the Census as a house, apartment, mobile home, group of rooms, single occupied or intended to be occupied for occupancy as separate living quarters.

The number of households in the Southeastern Wisconsin Region doubled from 1950 to 2010. In 1950, there were approximately 355,000 households. In 2010, there were approximately 800,100 households. Comparatively, the City of Racine had approximately 30,500 households and Racine County had 76,500 approximately households. Racine County accounted for approximately 9.5% of the households in Southeastern Wisconsin. Although the number of households nearly doubled in the Region, the average size of households has steadily decreased since 1970. The average household size in the seven-county Region has dropped from 3.36 persons per household in 1950 to 2.47 persons in 2010. In Racine County, the average household size also decreased from 3.37 persons per household in 1950 to 2.52 persons in 2010.

SEWRPC Household Projections

SEWRPC projected the estimated number of households out to the year 2035. SEWRPC projections indicate that the average size of households throughout the Region, including Racine County and the City of Racine, may be expected to continue to decrease in the years ahead, though not as rapidly as in the past. In the City of Racine, the average household size is projected to decrease by 5 percent, from 2.53 persons per household in 2010 to 2.41 in 2035.

The decrease in household size is anticipated as a result of a number of factors including a continued change in household types, as well as the projected increase in the older population age groups for which average household sizes tend to be smaller than for the total population. The proportion of the population living in group quarters, as opposed to the population living in households, is projected to increase slightly. Under the SEWRPC intermediate projection, the number of households in the City of Racine would increase by 1,800, or 5 percent, over the 35-year projection period, from 30,530 households in 2010 to 32,370 households in 2035.

Distribution of Minority Populations

Data from the 1970 decennial Census, the 2010 decennial Census and the 2008 to 2012 American Community Survey show that a large proportion of the Region's minority population resides in Milwaukee County. The racial composition of the Region by county in 1970 and 2010 is little changed in terms of concentration. Milwaukee County accounted for 87.9% of the minority population in 1970 and 74.2% of the minority population in 2010. Racine County had 8.7% of the Region's minority population in 1970 and 8.6% in 2010.

Finding

Distribution of Minority Populations

While not as segregated as some Southeastern Wisconsin communities, racial and ethnic minorities are concentrated in the central and eastern sections of the City of Racine.

This is an indirect impediment to fair housing choice primarily due to historic patterns of segregation that are somewhat self-perpetuating.

Concentrations of persons of color, particularly Black/African American and Hispanic populations are in the urbanized areas of Milwaukee, Racine, and Kenosha. The largest concentrations of Black/African American and Hispanic/Latino populations are within the City of Milwaukee. Milwaukee County represents about 89%

of the Region's Black/African American population and about 64% of the Region's Hispanic/Latino population in 2008. Racine County accounted for 7.5% of the African American population in the Region in 2008. This is the second highest concentration of African Americans in the Region.

Concentrations of racial and ethnic groups in the City of Racine and the Southeastern Wisconsin Region are shown in Maps 1 to 8. Map 8 shows concentrations of families in poverty. Areas with concentrations of families in poverty tend to overlap with areas that have a high concentration of minorities.

Dissimilarity Index

After the 2000 Census, the U.S. Census Bureau studied the racial and ethnic residential segregation patterns in the United States between 1980 and 2000. The study is documented in a report titled: *Racial and Ethnic Residential Segregation in the United States 1980-2000*, which was issued in 2002. The study is based on data from 1980, 1990, and 2000 U.S. Censuses. The study used persons of White/Non-Hispanic origin as a reference against other racial and ethnic groups. Additionally, it was measured against the census tract in the primary metropolitan statistical areas (PMSA) throughout the Country. Residential segregation in each applicable PMSA was measured using five dimensions of segregation, including:

- Evenness: involves the differential distribution of minority group members
- Exposure: measures potential contact
- Concentration: refers to the relative amount of physical space occupied by a minority group
- Centralization: indicates the degree to which a minority group is located near the center of an urban area
- Clustering: measures the degree to which minority group members live disproportionately in contiguous areas

The four minority groups included in the study were American Indians/Alaskan Natives, Native Hawaiians/Other Pacific Islanders; Black/African Americans; and Hispanic/Latinos. The study results for the Milwaukee-Waukesha PMSA does not include American Indians/Alaskan Natives or Native Hawaiians/Other Pacific Islanders due to the small populations compared to other areas studied. The study shows the Milwaukee-Waukesha PMSA was most segregated PMSA in the country for Black/African Americans and twelfth most segregated PMSA in the country for Hispanics/Latinos. It correlates to results from the 1980 analysis in which Milwaukee was ranked in the top six and the 1990 analysis in which Milwaukee was shown to be the most segregated in the country.

This did not change dramatically moving into the 2005-2009 American Community Survey. The Brookings Institute completed a similar study on large metropolitan areas. Milwaukee remained the most segregated large metropolitan area in the United States and moved up in the rankings to fifth most segregated in the country for Hispanics/Latinos. This study used a dissimilarity index to measure segregation in the Milwaukee metropolitan area. A dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. The values range from 0 for complete integration to 100 for complete segregation. For instance, if a city's White-Black dissimilarity index were 65, that would mean that 65% of White people would need to move to another neighborhood to make Whites and Black/African Americans evenly distributed across all neighborhoods.^{xx}

In 2010, segregation of Black/African Americans from persons of other races was lower in 657 of 658 housing markets compared to 1970 and in 522 of 658 markets compared with 2000.^{xxi} Black-White segregation rates have gradually declined, but remained high – especially in the Midwest and Northeast. Hispanic-White and Asian-White, by dissimilarity index, have remained steady since the 1970s.^{xxii}

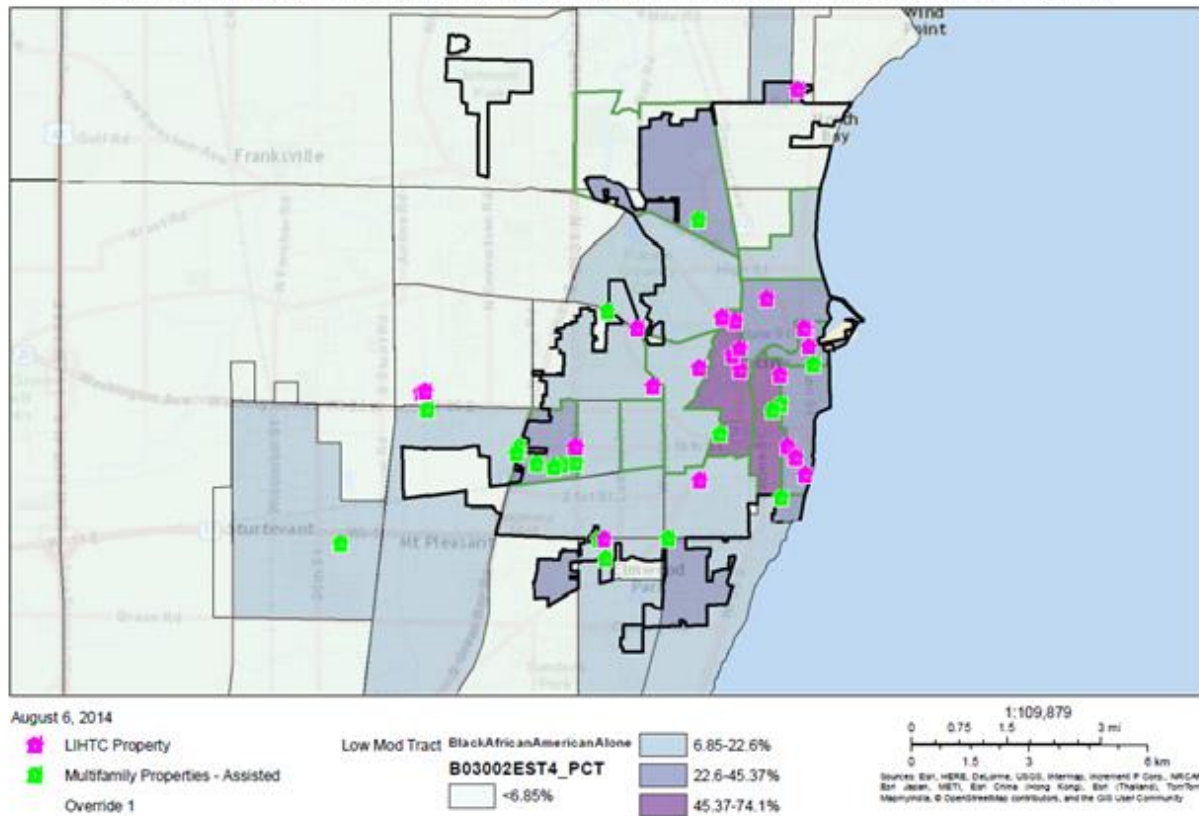
Nationally, a typical neighborhood for a White person would be 75% White, 8% Black/African American, 11% Hispanic/Latino, and 5% Asian. A typical neighborhood for a Black/African American person would be 45% Black/African American, 35% White, 15% Hispanic/Latino, and 4% Asian. A typical neighborhood for a person of Hispanic/Latino descent would be 46% Hispanic/Latino, 35% White, 11% Black/African American, and 7% Asian.^{xxiii}

A 2013 study by the Capital Area Regional Planning Commission shows that the City of Racine had a dissimilarity index of 37 for Black/African Americans and 33 for Hispanic/Latino populations as compared to Milwaukee’s dissimilarity index of 70 for Black/African Americans and 61 for Hispanic/Latino populations.^{xxiv} While Racine is not as segregated as some communities, what the index indicates is there are some areas of concentrations for Black/African American and Hispanic/Latino populations.

Table 2: Dissimilarity Index for Select Southeastern Wisconsin Municipalities

	White		Black/African American		Hispanic/Latino		Asian		Total	White-Black	White-Hispanic	White-Asian
Milwaukee	220,219	37%	243,059	41%	103,007	17%	22,696	4%	594,833	70%	61%	46%
Kenosha	68,967	70%	11,106	11%	16,309	16%	833	1%	99,218	36%	32%	37%
Racine	42,189	53%	18,921	24%	16,309	21%	753	1%	78,860	37%	33%	19%
Waukesha	56,868	80%	2,091	3%	8,529	12%	2,822	4%	70,718	24%	28%	35%
West Allis	49,547	82%	2,730	5%	5,770	10%	1,467	2%	60,411	22%	23%	24%
Wauwatosa	40,585	87%	2,492	5%	1,450	3%	1,602	3%	46,396	27%	14%	18%
Source: Capital Area Planning Commission												

City of Racine, WI - Concentration of African American or Black alone (Not Hispanic)

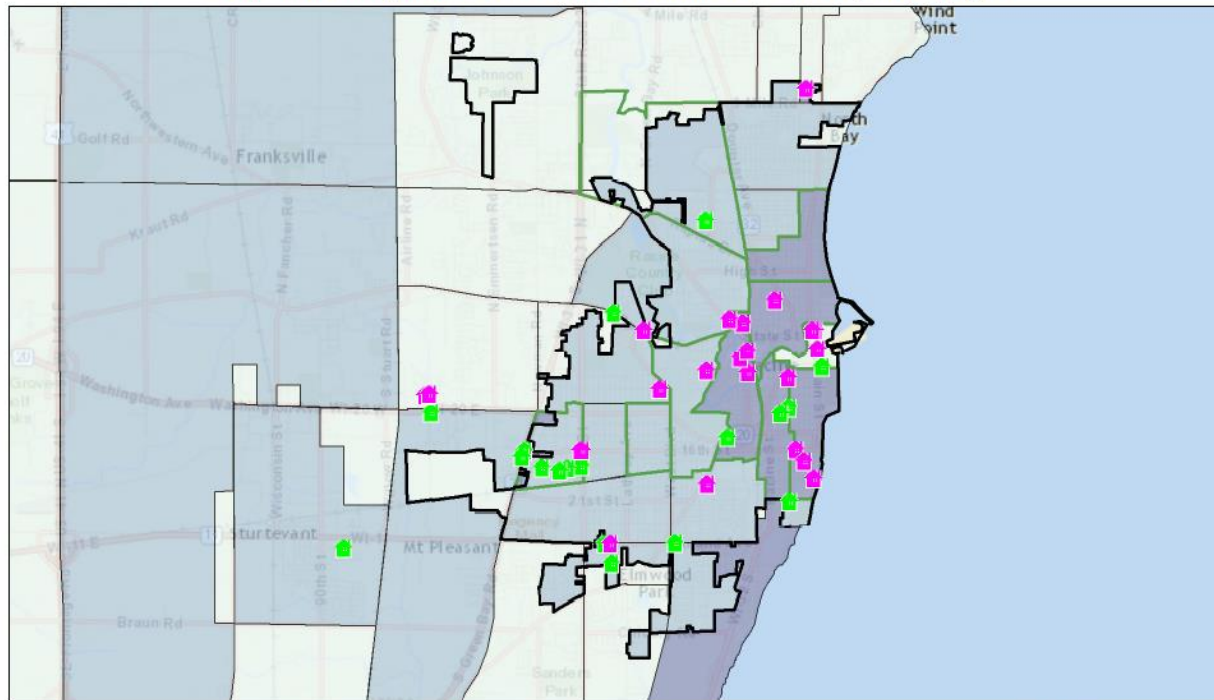


Map 1: Percentage of African American Population by Census Tract

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, OpenStreetMap contributors, and the GIS User Community

Map 1: Census tracts with a relatively high percentage of Black/African American residents. Tracts in medium and dark purple are those with 22.6% or greater Black/African American residents (2010 City-wide percentage was 22.6). The highest concentrations over 22.6% Black/African American residents are found in central, northeast, and south sides of Racine.

City of Racine, WI - Concentration of Persons of Hispanic Origin



August 7, 2014

LIHTC Property
 Multifamily Properties - Assisted
 Override 1

Low Mod Tract HispanicOrigin
B03002EST12_PCT
 7.12-23%
 23-46.54%
 <7.12%

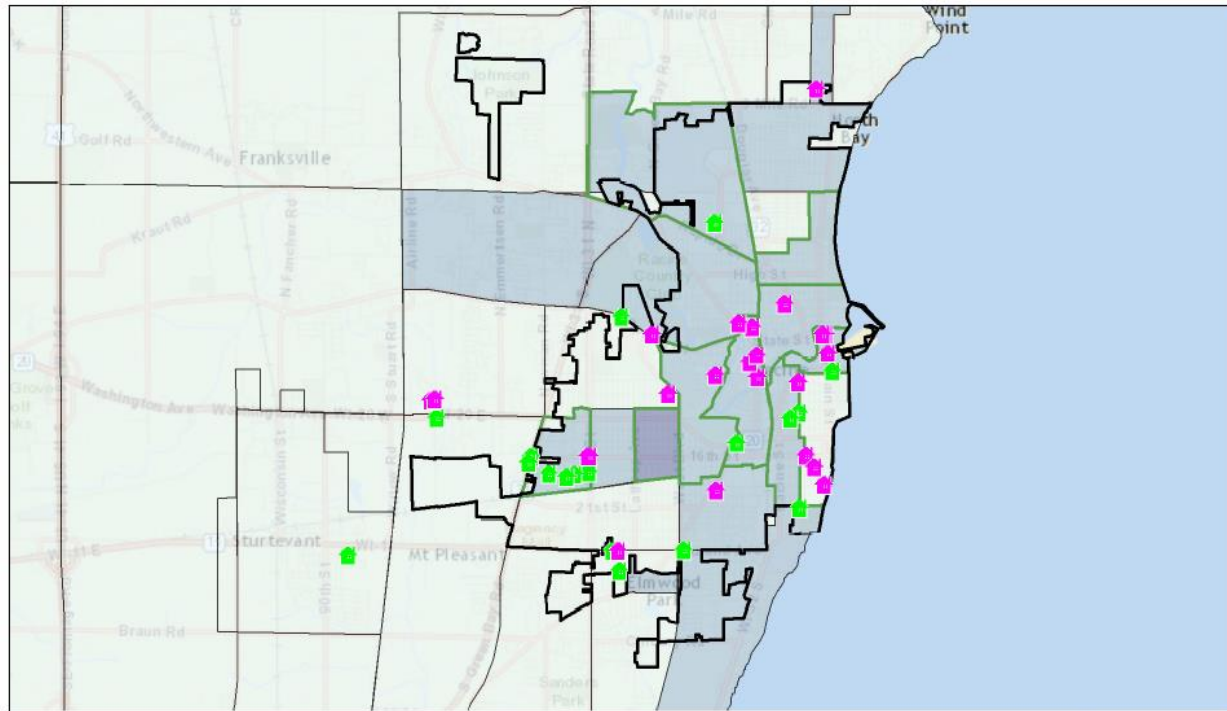
1:109,879
 0 0.75 1.5 3 mi
 0 1.5 3 6 km
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Map 2: Percentage of Hispanic Population by Census Tract

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, OpenStreetMap contributors, and the GIS User Community

Map 2: Census tracts with a relatively high percentage of Hispanic/Latino residents. Tracts in medium and dark purple are those with 23% or greater Hispanic/Latino residents (2010 City-wide percentage was 20.7%). The highest concentrations over 23% Hispanic/Latino residents are found in eastern Racine, but have a presence community-wide. The Hispanic/Latino population in the City of Racine increased 43% from 2000 to 2010 Census, or approximately 4,900 people.

City of Racine, WI - Concentration of Two or More Races alone (Not Hispanic)



August 7, 2014

LIHTC Property
Multifamily Properties - Assisted
Override 1

Low Mod Tract TwoOrMoreRaces
B03002TMNH_PCT
1.8-6.71%
6.71-18.24%
<1.8%

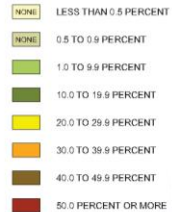
1:109,879
0 0.75 1.5 3 mi
0 1.5 3 6 km
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Map 3: Percentage of Two or More Races (Not Hispanic) Population by Census Tract

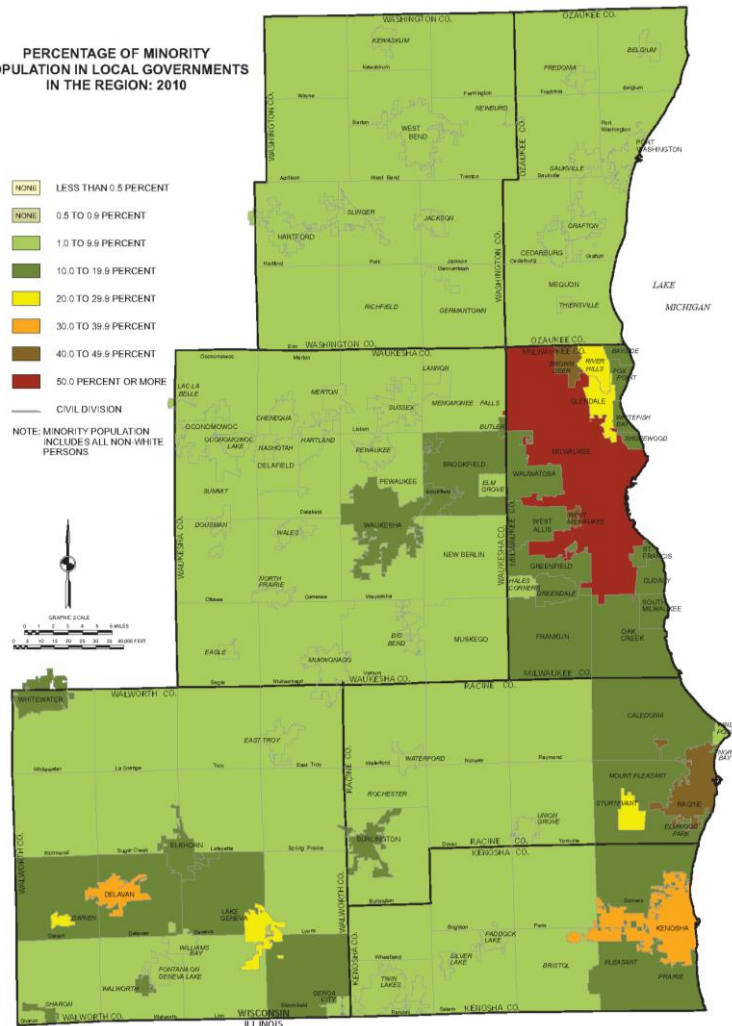
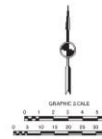
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, OpenStreetMap contributors, and the GIS User Community

Map 3: Census tracts with residents that identify with two or more races. Tracts in dark purple are those with 6.71% or greater of residents identifying with two or more races. The 2010 citywide percentage was 4.0%.

PERCENTAGE OF MINORITY POPULATION IN LOCAL GOVERNMENTS IN THE REGION: 2010



NOTE: MINORITY POPULATION
INCLUDES ALL NON-WHITE
PERSONS



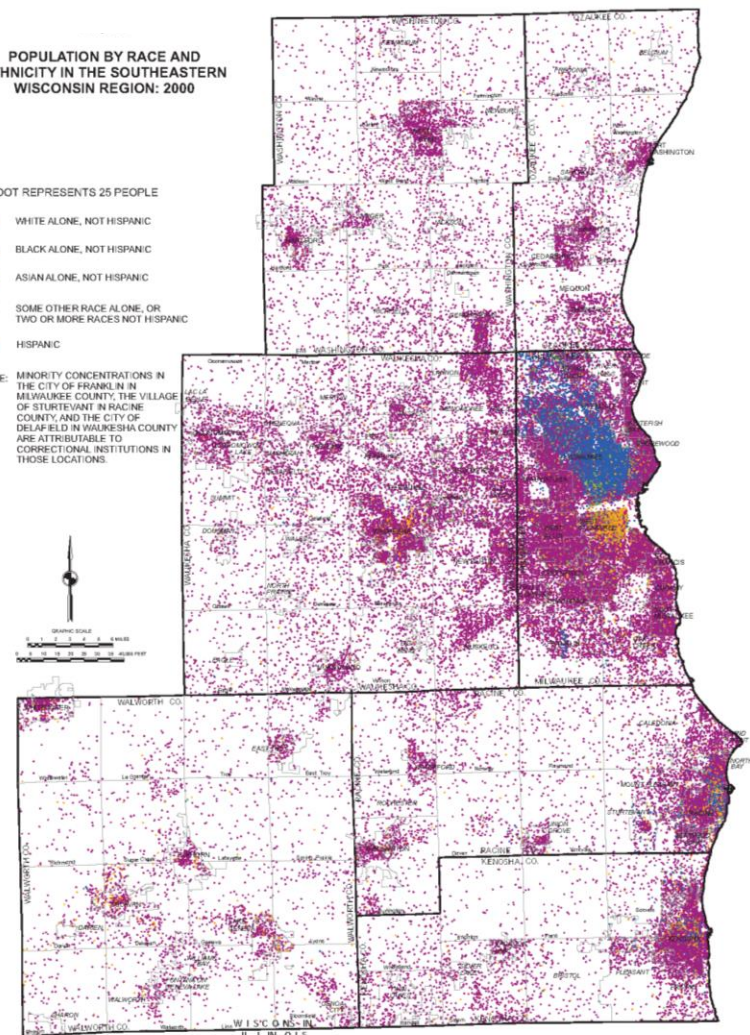
Map 4: 2010 Percentage of Minority Population in the Region

Sources: US Census and SEWRPC

POPULATION BY RACE AND ETHNICITY IN THE SOUTHEASTERN WISCONSIN REGION: 2000



NOTE: MINORITY CONCENTRATIONS IN
THE CITY OF FRANKLIN IN
MILWAUKEE COUNTY, THE VILLAGE
OF STURTEVANT IN RACINE
COUNTY AND THE CITY OF
DELAFIELD IN WAUKESHA COUNTY
ARE ATTRIBUTABLE TO
CORRECTIONAL INSTITUTIONS IN
THOSE LOCATIONS.



Map 5: 2010 Population by Race and Ethnicity

Sources: US Census and SEWRPC

Map 4: Concentrations of race and ethnicity throughout Southeastern Wisconsin. Map 5: Minority populations in the Southeastern Wisconsin Region. Note: The City of Racine minority population is slightly misrepresented. The 2010 U.S. Census estimates the total non-White population at 38.2% of the total population. This map is included to give perspective on the City of Racine from a regional perspective.

Persons with Disabilities

Table 3: Percentage of people in the City of Racine with a disability. Those 65 years and older make up the largest percentage of the population with a disability. This affirms that elderly populations have the greatest need for accessible housing. However, the prevalence of disability in the 18 to 64 year-old range in the City of Racine is higher than Racine County (11.4%), Wisconsin (9.4%), and the United States (10.1%).

Finding

Elderly and Persons with Disabilities

The disabled, who are primarily elderly, are represented throughout the City, but are more concentrated in central Racine.

This is an indirect impediment to fair housing choice again due to self-perpetuating historical patterns of segregation.

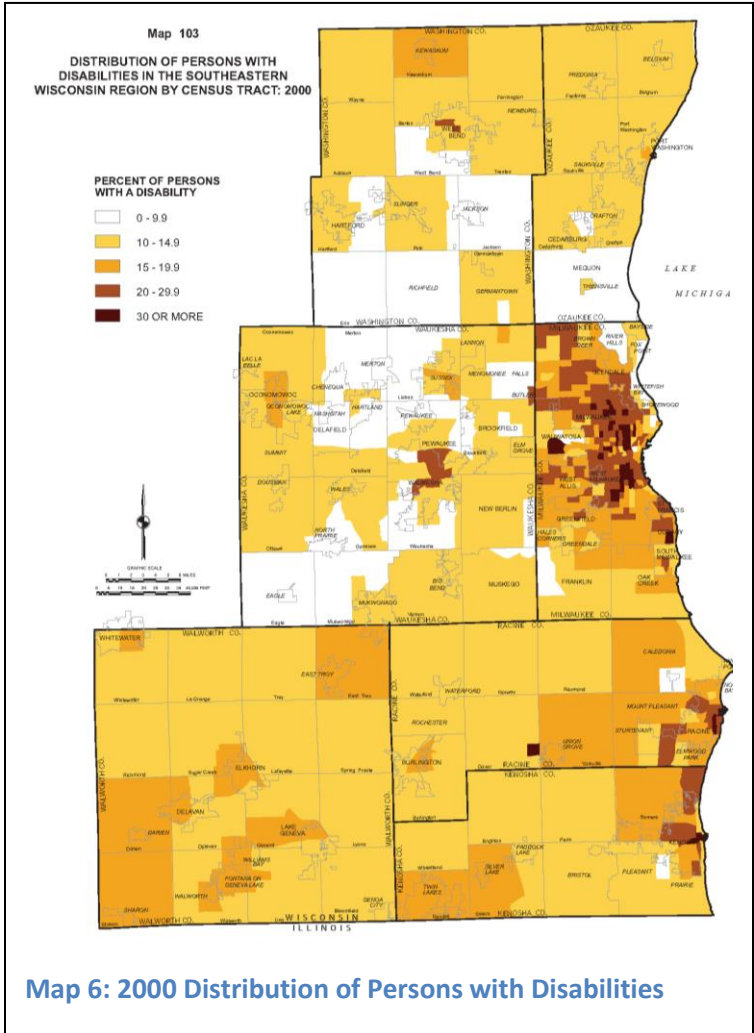
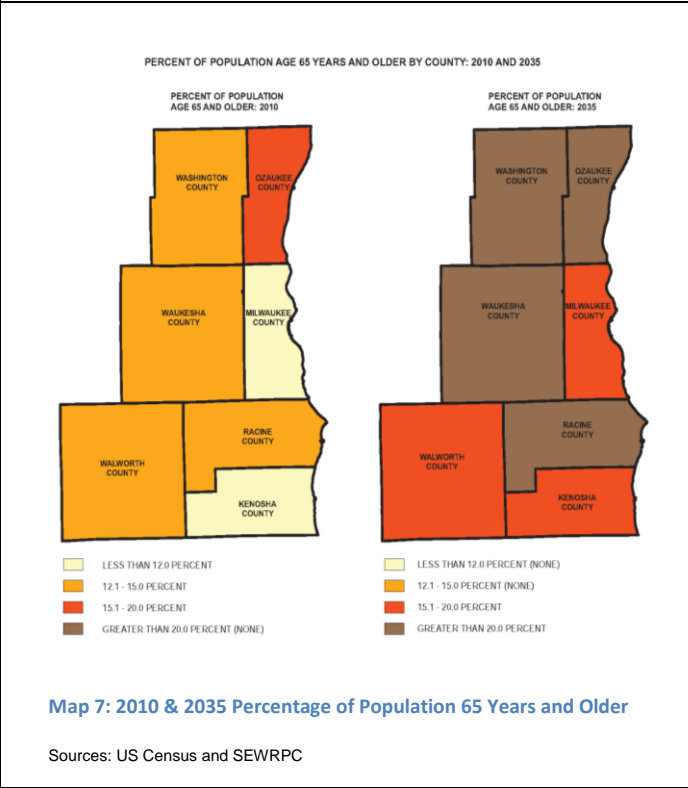


Table 3: Percent Population with a Disability

Under 5 years	1.0%
5 to 17 years	7.4%
18 to 64 years	13.0%
65 years or older	34.6%
Total Population	13.2%

Source: ACS 2012 5 Year Estimates



Maps 6 and 7: Areas in the Southeastern Wisconsin Region where concentrations of persons with disabilities reside (Map 6) as well as the increase in the population over age 65. Map 6: High poverty and high minority areas are also the locations of high percentages of disabled individuals in the City of Racine. Map 7: The percentage of those 65 years and older increases in every county; Racine County increases from 12.115.0% in 2010 to greater than 20% by 2035. In 2010, there are no counties with greater than 20% of the population aged 65 years and older. It is expected that as the percentage of the population aged 65 years and older increases, the incidence of disability will also increase.

Income and Poverty

The federal poverty line indicates the minimum resources families need for an adequate standard of living. The official poverty line varies by age and number of household members. The poverty threshold increases each year to account for inflation. In 2010, the federal poverty line was \$22,314 for a family of four and \$11,139 for a one person household. Though most researchers agree that the federal poverty line underestimates resources necessary to meet basic needs, poverty rates can be used to compare economic hardship among groups, across locations, and over time.^{xxv}

According to 2008-2012 ACS 5-Year Estimates, the median household income for the City of Racine is \$38,789, Racine County is \$67,024, the State of Wisconsin is \$66,415, and for the United States is \$64,585. The median household income for the City of Racine is 42% less than the median household income of Racine County. Approximately 21.5% of individuals in the City of Racine are below the poverty line in comparison to 12.6% for Racine County, 12.5% for the State of Wisconsin, and 14.9% for the United States. Map 8 identifies areas of the City of Racine with the highest concentrations of poverty.

Poverty and Food Insecurity

In recent years there has been increasing attention to the related issues of health, diet, and access to food by policymakers. “Food insecurity”, or a lack of access to sufficient, safe and nutritious food, is an indicator of poverty and in turn is linked to other problems such as poor health, behavioral problems, and learning and academic problems in children.^{xxvi}

The University of Wisconsin-Extension estimated the rate of food insecurity in Wisconsin population from 1996 to 1998; the rate was 8.5% in Wisconsin compared to 11.3% in the United States. From 2008 to 2010 food insecurity increased in Wisconsin to 11.8% while the national rate jumped to 14.6%. During the same time period, 15.8% of the population in Racine County indicated they did not always have money to buy the food they needed. Additionally, the number of Racine County residents receiving Supplemental Nutrition Assistance Program (SNAP, which is referred to as FoodShare in Wisconsin) benefits increased between 2000 and 2010. In 2010, the participation in FoodShare for Racine County was 19% percent compared to a statewide rate of 17%.^{xxvii}

In the 2013, the University of Wisconsin Population Health Institute identified 8% of Racine County as a “food desert”, or a neighborhood mostly of low-income individuals who cannot easily access healthy and affordable food as defined by the US Department of Agriculture’s Economic Research Services based on Census Data.^{xxviii} A majority of the area of Racine County identified as a food desert is in downtown Racine with only one grocery store providing fresh produce. Maps 9a and 9b show areas identified in Racine as food deserts. These areas of Racine correspond to areas with high concentrations of poverty, ethnic, minority and disabled populations.

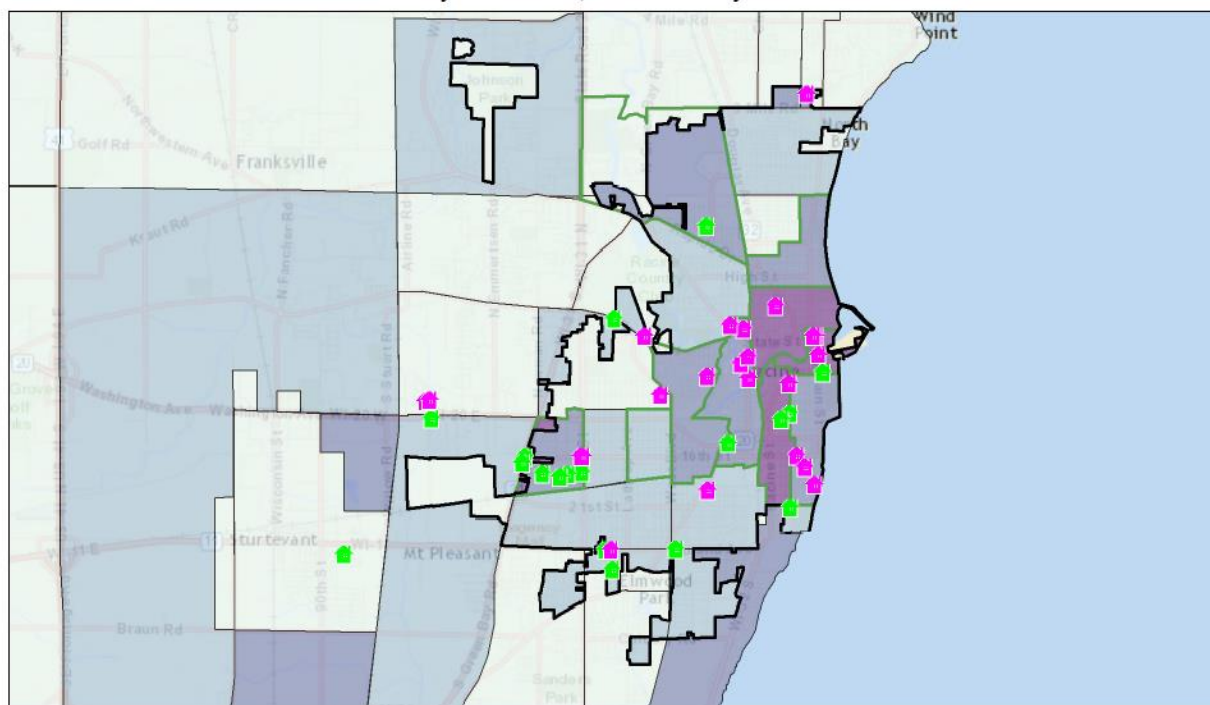
Finding

Poverty and Food Insecurity

Areas with high concentrations of poverty along with high concentrations of minority, ethnic, and disabled populations are disproportionately affected by food insecurity.

This is an indirect impediment to fair housing choice.

City of Racine, WI - Poverty Rate



August 6, 2014

LIHTC Property
Multifamily Properties - Assisted
Override 1

Low Mod Tract PovertyRate

B17021EST2_PCT

<6.96% Poverty

6.96-19.04% Poverty

19.04-35.95% Poverty

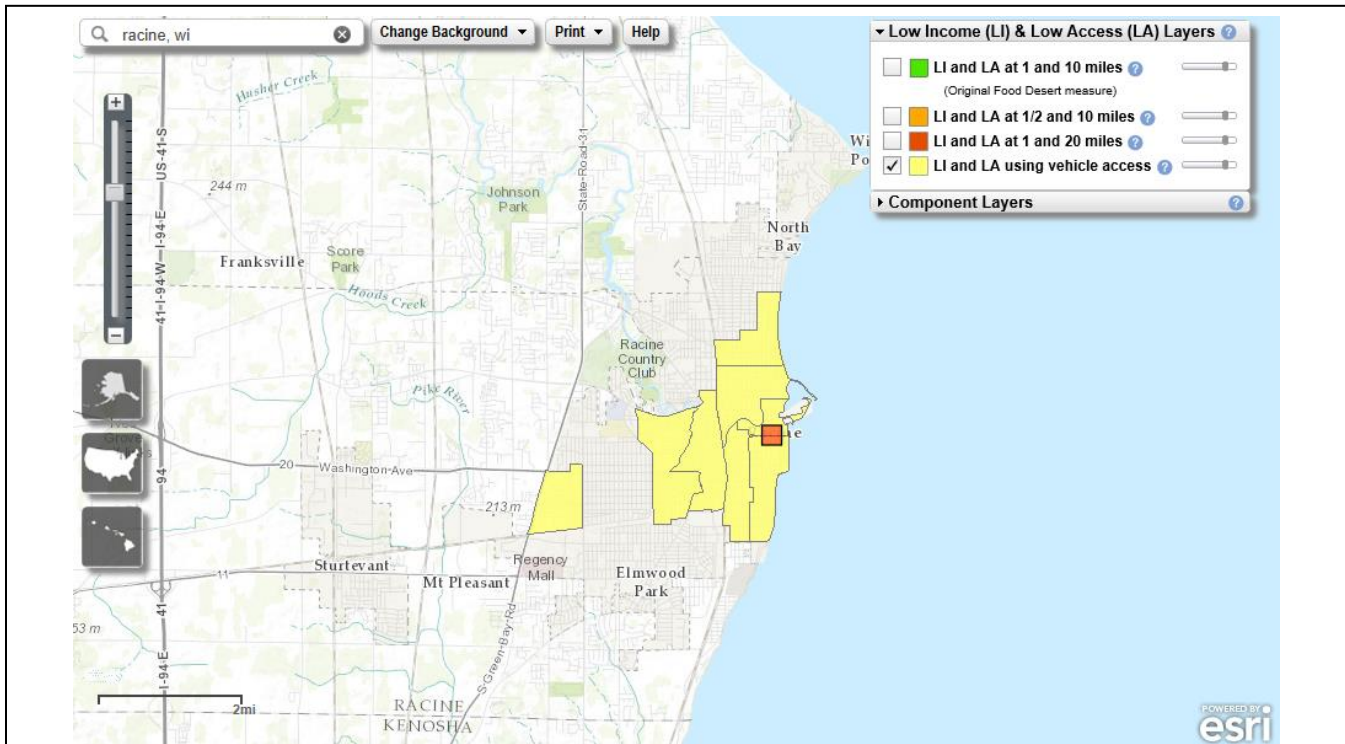
35.95-64.47% Poverty

1:109,879
0 0.75 1.5 3 mi
0 0.75 1.5 3 km
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

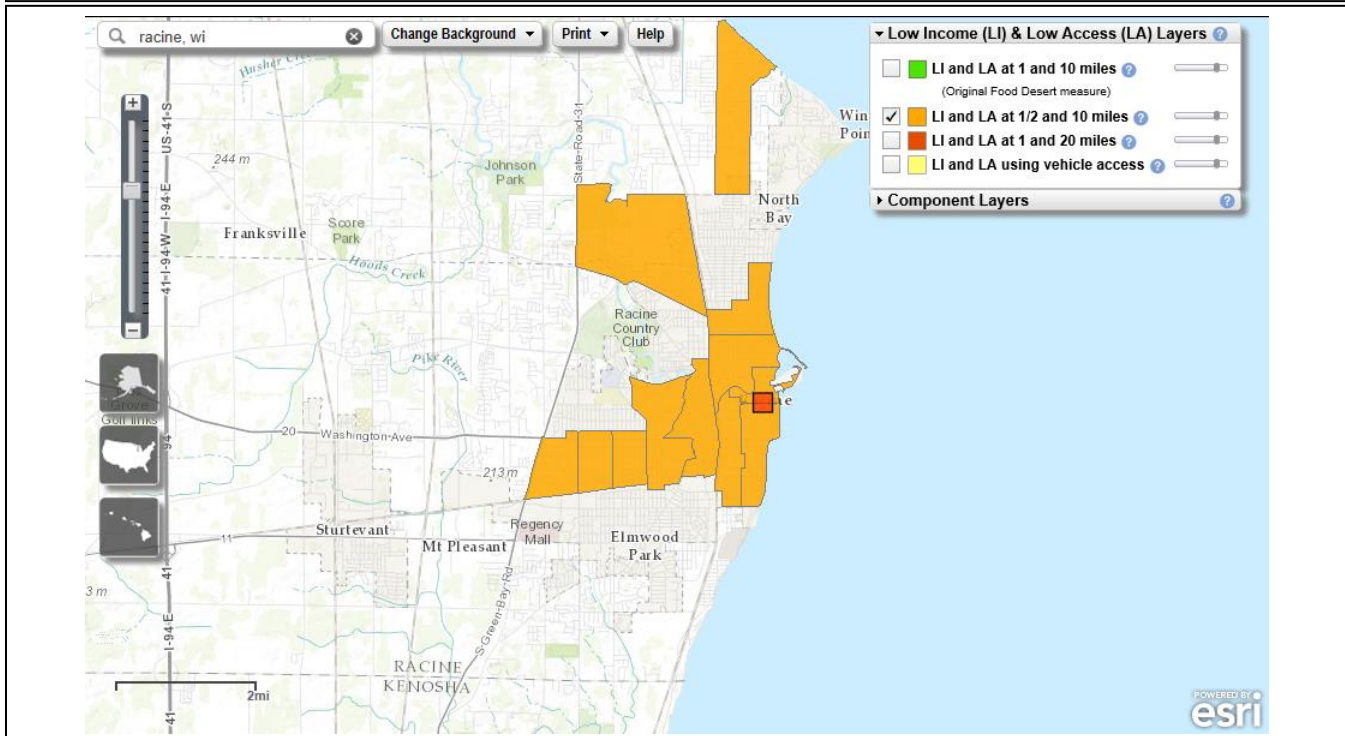
Map 8: Poverty Rate by Census Tract

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, OpenStreetMap contributors, and the GIS User Community

Map 8: Census tracts with high concentrations of poverty. Tracts in medium to dark purple are those with 19% or greater of households in poverty. The 2010 citywide percentage of households in poverty was 18.5%. The highest concentrations of households in poverty are found in northwestern and central Racine.



Map 9a: Food Deserts by Census Tract – Low income areas with limited access to a grocery store by vehicle



Map 9b: Food Deserts by Census Tract – Low income areas with limited access to a grocery store within 0.5 miles

Maps 9a and 9b: Food deserts with low income residents and limited access to grocery stores either by walking/biking or by vehicle. The central and northwestern sections of Racine, areas of high poverty, are most heavily affected by food access issues.

IV. Housing Profile

This section includes inventories and analyses related to housing in the City of Racine as well as regional trends. The following areas will be evaluated: housing stock, condition, vacancy, affordability, lending policies and practices.

Housing Stock

Housing stock in Racine is split 60-40% between single and multi-family units (Figure 1).

Development of Racine happened in concentric rings around the urban center from 1850 to 1950. After the development of the interstate in the 1950s, the urban growth pattern and rate of development increased. Racine's housing stock is older than the housing stock in the Region. About 21% of the regional housing stock was built prior to 1940. Nearly 50% of housing in the City of Racine was built prior to 1940. The average construction year of all residential structures in the City of Racine is 1934. The average age of structures within the City of Racine, by unit type, is:

- 0 to 1 units – 1938
- 2 to 4 units – 1916
- 5 to 16 units – 1932
- 17 to 32 units – 1964
- 33 or more units – 1962

Most of the lower density (2 to 16 units) multi-family housing units are concentrated in the 1850 to 1940 rings of development.

Physical Condition of Housing Stock

The age of existing housing stock provides insight into its character and condition. As the overall housing stock ages, more housing units need to be rehabilitated or replaced.

Building Code Violations

One way to look at the condition of housing stock is to review the number of residential building code violations. Building code violations range from properties needing new porches to peeling paint. Between 2010 and 2013, there were 1,072 total residential properties within the City of Racine issued building code violation orders. Some properties received multiple violation orders. There were 7,122 violations during this time period, with 5,635 corrected by the property owner and 1,487 open orders. On average, 2,300 violation orders are sent out by the City of Racine Building Department each year.

Finding

Housing Stock

Areas of predominantly poor, minority, ethnic, elderly and disabled populations reside in the oldest housing stock in the City of Racine.

This is an indirect impediment to fair housing choice. Lower cost housing opportunities are available in older and sometimes sub-standard housing.

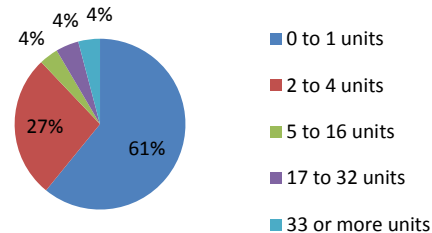
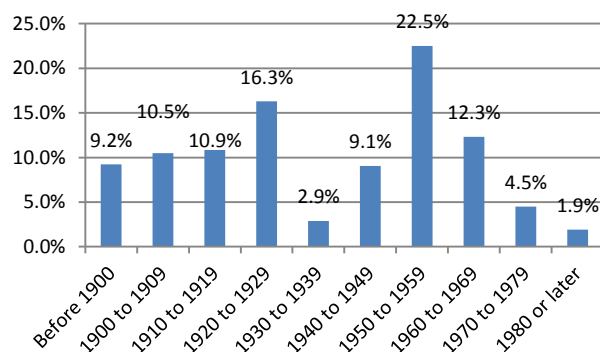


Figure 2: Age of Housing Stock



In some instances, the code violations are so severe that a house may need to be demolished. In the past three years, 24 residential properties were demolished in the City. There are 17 additional residential properties that could be demolished in 2014 and 2015.^{xxx} The increase in the number of homes that have been, or could be, demolished is a direct result of the housing crash of 2007 because many homes were foreclosed on, lost equity, or abandoned around this time.

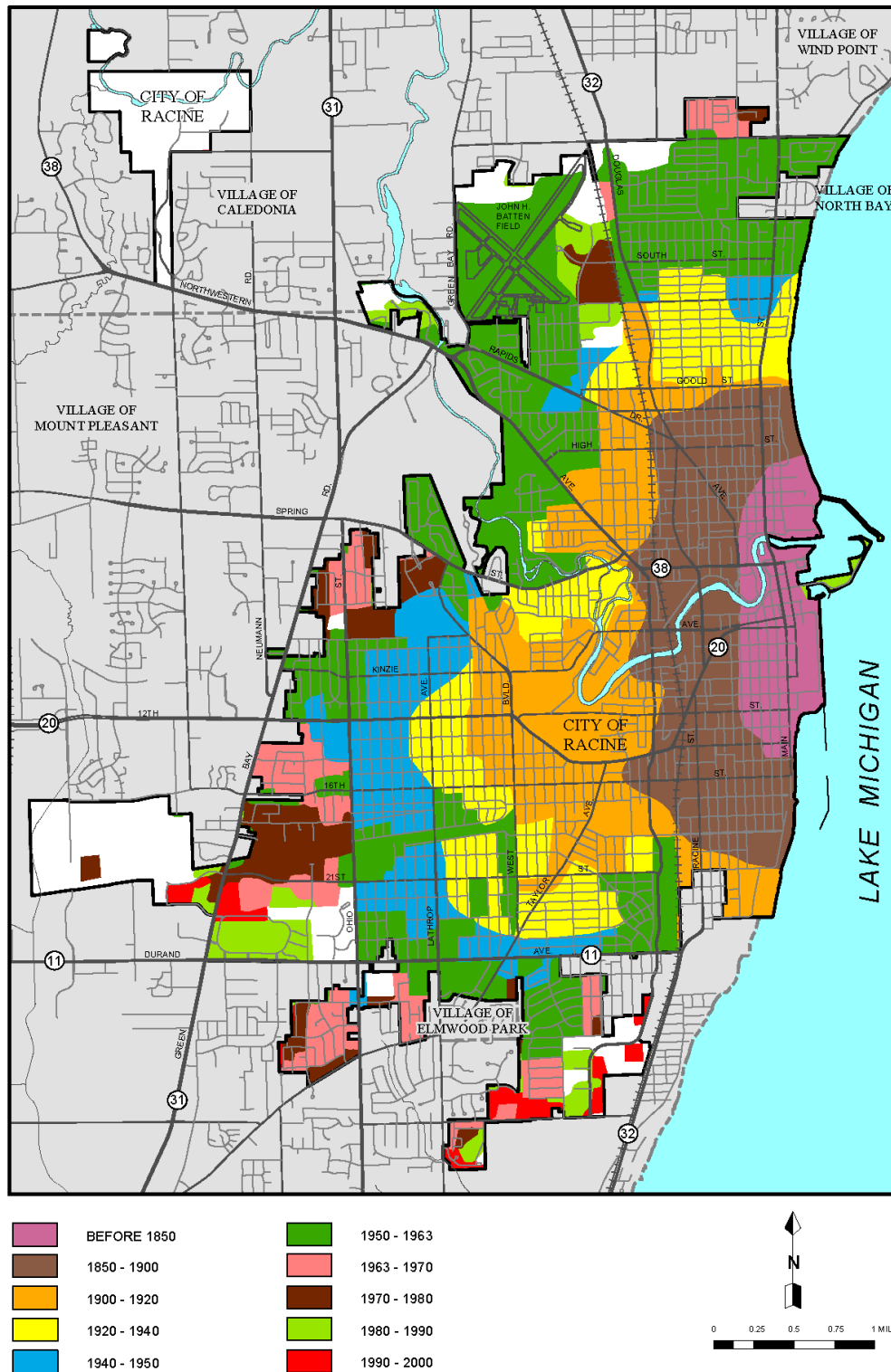
Map 11 shows residential code violations in the City of Racine. Residential properties with code violations have been overlaid on low-to-moderate income (LMI) areas of the City of Racine. HUD defines LMI areas as those that have household incomes at 80% or below the area median income. The ACS calculated area median income (AMI) at \$38,550. For instance, households earning 30% of AMI would earn \$11,565 or less per year. Of the 1,072 properties, 652, or 60 percent, that have violations are located in LMI areas.

Substandard Housing – Lacking complete plumbing or kitchen facilities

The Comprehensive Housing Affordability Study (CHAS), a dataset created by HUD, demonstrates the number of households in need of housing assistance. The CHAS is estimated using the number of households that have certain housing problems such as a lack of complete plumbing and/or kitchen facilities. Within the City of Racine, the CHAS shows there are total of 95 renter-occupied units that lack plumbing or kitchen facilities and 35 owner-occupied units that lack plumbing or kitchen facilities. Most of these housing problems are located in households that earn far less than the Area Median Income (AMI) (Table 4)..

Table 4: Substandard Housing – Lacking Complete Plumbing or Kitchen Facilities									
Renter-Occupied Housing					Owner-Occupied Housing				
0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
65	20	10	0	95	0	15	20	0	35
Source: 2006-2010 CHAS									

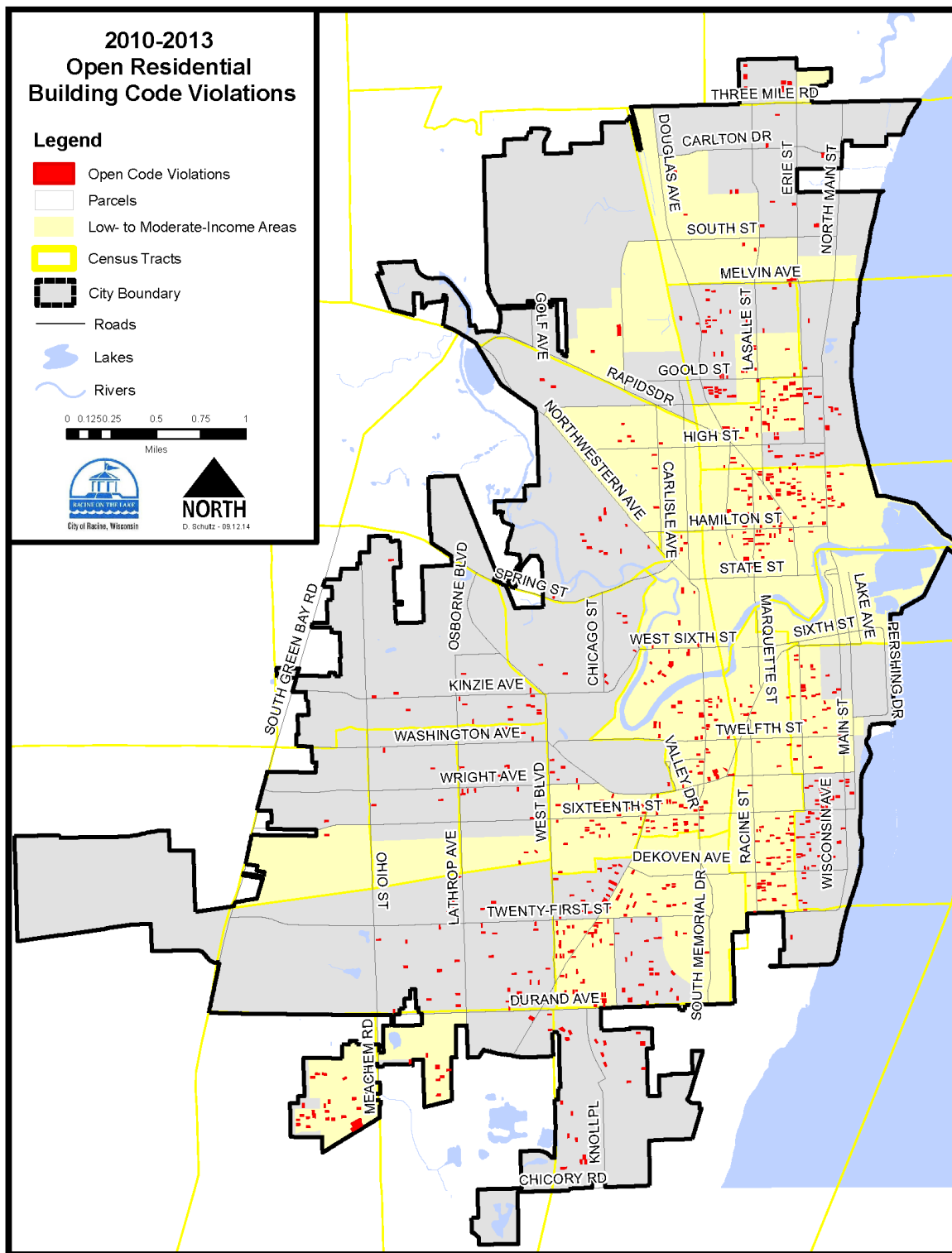
HISTORIC URBAN GROWTH IN THE CITY OF RACINE: 1850 - 2000



Map 10: Historic Urban Growth 1850- 2000

Source: SEWRPC

Map 10: Historic urban growth patterns in the City of Racine from 1850-2000. Much of the City of Racine was developed prior to 1940, which is reflected in the City's incorporation date of January 2, 1838.



Map 11: Open Residential Building Code Violations 2010-2013

Source: SEWRPC

Map 11: Building code violations from 2010 to 2013 within the City of Racine. Of the 1,072 properties with residential code violations, 652, or 60%, are located in low-to-moderate income areas.

Number of Bedrooms

The number of bedrooms in housing units within the City is an important consideration in providing housing that is best suited for current and future housing needs. This can be examined to determine if overcrowding is present in the housing market. Table 5a shows the estimated number of bedrooms for owner-occupied units. The majority of owner-occupied units have two or more bedrooms, with three bedrooms being most common in the City of Racine. Three-bedroom rental units make up 54.6% of the total rental housing stock. For the Region: one or no bedroom units (efficiencies/studios) make up 1.8% of the total, two bedrooms are 19%, three bedrooms are 54%, four bedrooms are 21.1%, and, five bedrooms or more make up 4.1%. The City of Racine has more two-bedroom units than the Region and fewer three or more bedroom units. The potential for overcrowding in owner-occupied units appears to be higher in the City of Racine than the Region.

Finding

Number of Bedrooms and Overcrowding

The City of Racine may have overcrowding in its single-family housing options.

This is an indirect impediment to fair housing choice.

Table 5a.: Housing Units by Number of Bedroom: Owner-Occupied

Year	1 or No Bedroom		2 Bedrooms		3 Bedrooms		4 Bedrooms		5 or More Bedrooms		Total
2000	559	2.9%	4,552	23.9%	10,423	54.6%	3,028	15.9%	507	2.7%	19,069
2008-2012	5,123	1.7%	10,342	30.3%	14,552	42.6%	3,367	9.9%	746	2.2%	34,130

Source: US Census and ACS

Table 5b: Estimated number of bedrooms in renter-occupied units. The majority of renter-occupied units are two-bedroom units. In the Southeastern Wisconsin Region: one or more bedrooms make up 30.6% of the total, two-bedroom units are 45.5%, and three or more bedroom units are 23.9%. The City of Racine fares somewhat better than the Region in renter-occupied housing. It has more three or more bedroom units than the region and similar amounts of one and two-bedroom units.

Table 5b.: Housing Units by Number of Bedrooms: Renter-Occupied

Year	1 or No Bedroom		2 Bedrooms		3 or More Bedrooms		Total
2000	4,119	32.9%	5,157	41.2%	3,247	25.9%	12,523
2008-2012	3,779	27.9%	5,230	38.6%	4,537	33.5%	13,546

Source: US Census and ACS

Overcrowding

HUD, using the CHAS dataset mentioned in the previous section on substandard housing, also addresses overcrowding and severe overcrowding. It defines overcrowding as more than 1.0 person per room and severe overcrowding more than 1.5 persons per room. The data shows that renter-occupied and lower-income households experience overcrowding and severe overcrowding at rates higher than owner-occupied households.

Table 6: Overcrowding										
Renter-Occupied Housing						Owner-Occupied Housing				
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	Total
Overcrowded	80	215	30	25	350	40	60	50	45	195
Severely Overcrowded	50	30	4	0	84	0	0	0	0	0

Source: 2006-2010 CHAS

Housing Tenure

Table 7: Household tenure in relation to race and ethnicity in the City of Racine. Minorities are more likely to rent than their White counterparts; in the City of Racine, 71% of African Americans and about 53% of Hispanics rent rather than own their housing unit. White households are more likely to own rather than rent, with 68% owning homes. This trend is consistent with the Southeastern Wisconsin Region. In the seven-county Region, 70% of Whites own homes and 30% rent homes while about 68% of African American householders and 58% of Hispanic households rent their homes.

Table 8: Length of residency for all owner-occupied and renter-occupied homes is long-term within the City of Racine, with 51.9% of homeowners reporting five or more years at their present address and 36.9% reporting ten years or more at their present address.

Finding

Housing Tenure

Minority households, particularly African American households, have extremely low rates of home ownership. While consistent with regional trends, it is an impediment to fair housing choice.

This is an indirect impediment to fair housing choice that is related to the self-perpetuating effect of segregation.

Table 7: 2010 Housing Tenure by Race/Ethnicity of Household				
Households	Owner-Occupied		Renter-Occupied	
White	13,249	68.1%	6,202	31.9%
African American	1,830	29.0%	4,489	71.0%
Hispanic	1,997	46.9%	2,263	53.1%
All	17,359	56.7%	13,262	43.3%

Source: US Census

Table 8: 2010 Years of Occupancy		
Moved in 2010 or later	3,447	11.3%
Moved in 2000 to 2009	15,906	51.9%
Moved in 1990 to 1999	4,922	16.1%
Moved in 1980 to 1989	2,169	7.1%
Moved in 1970 to 1979	1,901	6.2%
Moved in 1969 or earlier	2,292	7.5%

Source: US Census

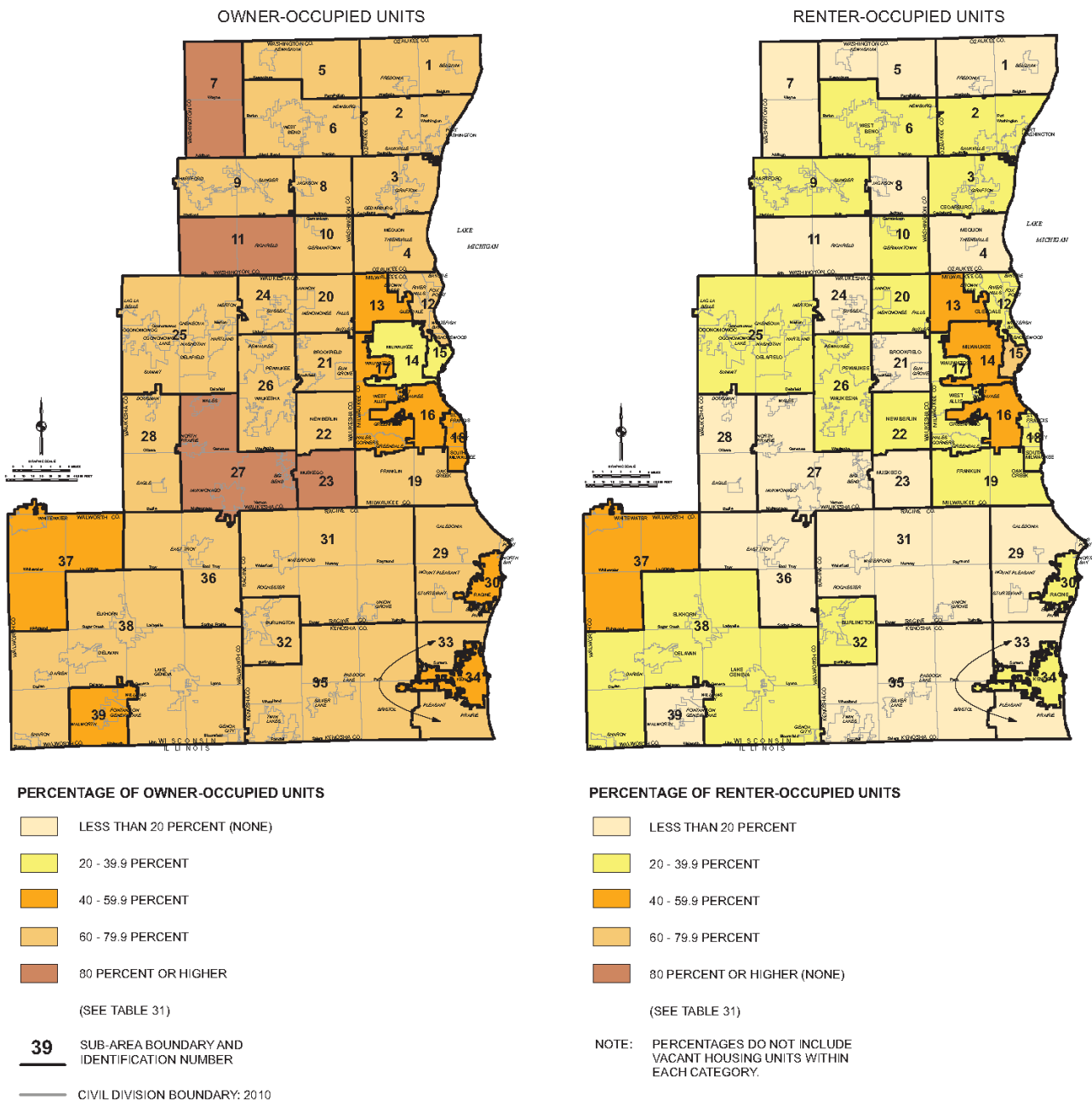
Housing Vacancy

Another key housing supply dataset is vacancy rate of housing units by housing type. Some vacancies are necessary for a healthy housing market. The standard recommended by the HUD is a minimum overall vacancy rate of 3% to ensure adequate housing choice. HUD further recommends that an area have a homeowner vacancy rate of 1-2% and a rental housing unit vacancy rate of 4-6%. Vacant housing can fall into several categories including: for rent, for sale only, rented or sold (not occupied), seasonal/recreational/occasional use, migrant worker, and other. Migrant and seasonal/recreational/occasional uses are generally not for sale or rent by the general public.

Within Southeastern Wisconsin, about 92% of units were occupied and 8% were vacant in 2010. In the City of Racine, approximately 90% of units were occupied and 10% were vacant. Table 9 summarizes the vacancy rates between 2000 and 2010. There were large increases in the number of housing vacancies, from 6% in 2000 to almost 10% in 2010.

Table 9: City of Racine Housing Vacancies									
Households	For Rent	For Sale Only	Rented or Sold, not Occupied	For Seasonal, Recreational, or Occasional Use	For Migrant Works	Other Vacant	Total Vacant Units	Total Units	Total Vacancy Rate
2000	970	200	149	74	0	576	1,969	33,509	5.9%
2010	1,619	616	137	149	2	840	3,363	33,984	9.9%
Source: US Census and SEWRPC									

PERCENT OF OWNER- AND RENTER-OCCUPIED HOUSING UNITS
IN THE SOUTHEASTERN WISCONSIN REGION: 2010



Map 12: Percent Owner- and Renter-Occupied Housing in 2010

Source: SEWRPC

Map 12: The seven-county Southeastern Wisconsin Region in terms of owner-occupied and renter occupied housing. Like much of the Region, the City of Racine has an approximately 60%-40% split between owner-occupied and renter-occupied householders.

Housing Affordability

Affordable housing includes all housing types, including subsidized and market rate housing, and the availability of affordable housing is an important component in fair housing choice. The term “affordable housing”, however, is used differently by different people and groups. For this analysis document, affordable housing is defined to match the definition used by both HUD and the *Regional Housing Plan for Southeastern Wisconsin: 2035*: a housing unit that costs no more than 30% of gross household income.

Value of owner-occupied housing

The most recent data available for the Region, included in the *Regional Housing Plan for Southeastern Wisconsin: 2035*, shows that the median value of a home in 2000 in Southeastern Wisconsin was \$130,700. The median value rose significantly in the 2005 - 2009 ACS to \$194,683, a nearly 33% increase. In Racine, the median value of owner-occupied housing followed this pattern, increasing by 34% from 2000 to the value in the 2005 - 2009 ACS, demonstrating the rapid rise in housing values prior to the recession in 2007. It appears based on the 2010- 2012 5-Year ACS that there has been a “market correction” in median home values. The median home value of a single-family home dropped to \$119,600 from \$127,794, a nearly 7% decrease.

Finding

Housing Affordability

While housing costs less in the City of Racine than the region for both owner-occupied and renter-occupied housing, 34.4% of home-owners and 56.9% of renters are paying over 30% of their gross household income towards housing costs.

This is an indirect impediment to fair housing choice that is related to the self-perpetuating effect of segregation.

Table 10: Value for Owner-Occupied Housing Units

Year	Less than \$50,000		\$50,000 to \$99,999		\$100,000 to \$149,999		\$150,000 to \$199,999		\$200,000 to \$299,999		\$300,000 to \$499,999		\$500,000 or more		Total	Median Value
2000	1,391	8.2%	11,726	68.7%	3,113	18.2%	518	3.0%	190	1.1%	94	0.6%	40	0.2%	17,072	\$ 83,700
2005-2009	657	3.5%	3,549	18.8%	9,504	50.2%	3,510	18.6%	1,110	5.9%	433	2.3%	162	0.9%	18,925	\$ 127,794
2010-2012	578	3.4%	3,633	21.3%	7,800	45.6%	3,344	19.6%	1,097	6.4%	466	2.7%	118	0.7%	17,091	\$119,600

Source: US Census and ACS

Monthly Owner Housing Costs

Table 11: Monthly housing costs for owner-occupied housing units with a mortgage in 2000 and 2008-2012 ACS. Monthly owner costs are the sum of mortgage payments or similar debts on the property as well as real estate taxes; fire, hazard, and flood insurance on the property; and utilities.

These costs are analyzed to determine if the City of Racine has an adequate supply of affordable housing in comparison with the Southeastern Wisconsin Region. In 2000, the Region had a median monthly cost of \$1,123 and it increased to \$1,578 in the 2005-2009 ACS, the most recent data available for the Region. The City of Racine was well below the median monthly owner cost for the Region during both time periods..

Table 11: Monthly Owner Costs for Housing Units with a Mortgage

Year	Less than \$700		\$700 to \$999		\$1,000 to \$1,499		\$1,500 to \$1,999		\$2,000 or more		Median
2000	2,564	22.6%	4,894	42.4%	3,311	28.7%	559	4.8%	217	1.9%	894
2008-2012	624	5.3%	2,308	19.5%	5,656	47.8%	2,361	19.9%	889	7.5%	1,258

Source: US Census and ACS

Table 12: Owner-occupied housing units without a mortgage. In 2000, the Region had a median monthly owner cost of \$331 and it increased to \$502 in the 2008-2012 ACS, the most recent data available. Again, the City of Racine was below the median monthly owner costs for the Region during both time periods.

Table 12: Monthly Owner Costs for Housing Units without a Mortgage							
Year	Less than \$300		\$300 to \$399		\$400 or more		Median
2000	1,919	34.7%	2,392	43.3%	1,216	22.0%	331
2008-2012	357	6.8%	728	13.9%	4,168	79.3%	502
Source: US Census and ACS							

Monthly Gross Rents

Table 13: Monthly gross rent reported by the 2000 US Census and the 2008-2012 ACS shows that Racine has slightly lower median monthly gross rents compared to the Region. The Southeastern Wisconsin median monthly gross rents were \$578 in 2000 and \$769 in the 2005-2009 ACS.

Table 13: Monthly Gross Rent for Renter-Occupied Housing Units															
Year	Less than \$300		\$300 to \$499		\$500 to \$749		\$750 to \$999		\$1000 to \$1,499		\$1,500 or more		No Cash Rent		Median Rent
2000	1,225	9.8%	4,152	33.2%	5,546	44.3%	946	7.6%	168	1.3%	22	0.2%	448	3.6%	520
2008-2012	677	5.1%	1,751	13.3%	4,848	36.9%	3,984	30.3%	18,706	13.7%	88	0.7%	392	0.0%	720
Source: US Census and ACS															

Cost Burden

Using the definition from the HUD and the *Regional Housing Plan for Southeastern Wisconsin: 2035*, a household is cost overburdened if their monthly housing costs, including utilities, are greater than 30% of gross household income. According to the 2008-2012 American Community Survey 5-Year Estimates, many Racine residents do not live in affordable housing. 34.4% of homeowners and 56.9% of renters are overburdened in terms of meeting the affordable housing cost threshold. (Table 14)

Table 14: Selected Housing Costs as a Percentage of Household Income					
Selected Monthly Owner Costs as a Percentage of Household Income	Households	Percent	Gross Rent as a Percentage of Household Income	Households	Percent
Less than 20%	3,898	33.0%	Less than 20%	2,861	21.1%
20 to 24.9%	2,154	18.2%	20 to 24.9%	1,286	9.9%
25 to 29.9%	1,697	14.4%	25 to 29.9%	1,430	11.1%
30 to 34.9%	810	6.9%	30 to 34.9%	1,254	9.7%
35% or more	3,247	27.5%	35% or more	6,105	47.2%
Not computed	32			610	
Source: ACS					

CHAS data developed by HUD adds additional information on the housing cost burden by percentage of Area Median Income (AMI) and by race and ethnicity. This data shows that of a total of 31,375 households in the City of Racine, 62% of households pay 30% or less of their gross income on housing costs; 38% pay 30% or more of their household income towards their housing costs and are considered cost burdened.

The CHAS dataset also looks at housing cost overburden in terms of race and ethnicity. The data shows that minority households generally pay a greater share of their income towards housing than White households. The total percentage of White households paying more than 30% of household income towards housing costs is 32% compared with 53% of Black/African American households and 44 % of Hispanic/Latino households.

Table 15: Housing Cost Burden by Race/Ethnicity							
	Less than 30%		30-50%		Greater than 50		Total by Race
White	14,020	68%	4,225	20%	2,470	12%	20,715
Black/African American	2,740	46%	1,445	24%	1,750	29%	5,935
Asian	135	91%	4	3%	10	7%	149
Native American/Alaskan Native	10	34%	4	14%	15	52%	29
Hispanic	2,290	56%	1,125	28%	660	16%	4,075
Total by Cost Burden	19,440	62%	6,890	22%	5,045	16%	31,375

Household composition is also useful to analyze the types of populations that may experience housing cost overburden. It appears that the largest groups of renters affected by housing cost overburden are small/related households (two to four related family members) and other (non-elderly, non-family) households. The largest groups of homeowners affected are also small/related households and elderly households.

Table 16: Households with Cost Burden > 30% by Household Composition								
Renter-Occupied Housing					Owner-Occupied Housing			
	0-30% AMI	30-50% AMI	50-80% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	Total
Small Related	1,115	1,295	240	2,650	295	470	640	1,405
Large Related	320	200	40	560	35	145	125	305
Elderly	270	285	210	765	360	445	175	980
Other	1,810	550	610	2,970	180	265	430	875

Source: 2006-2010 CHAS

About 33% of households in the State, about 36% of households in the Region, and 35% of households in the nation have a high housing cost burden. Housing cost overburden in the Region by household type is:

- 35% of homeowners with a mortgage
- 19% of homeowners without a mortgage
- 47% of renter households

Housing affordability is a concern in the City of Racine and in the Region. While Racine has comparable homeowner housing affordability to the Southeastern Wisconsin Region, it is 10 percentage points higher than the Region in renter housing affordability.

Foreclosures

Foreclosures are another indicator of housing affordability in the housing market. The housing market collapse that began in 2007 and peaked in 2009 caused record levels of foreclosures across the country. Although Wisconsin was not among the most vulnerable states, Racine County was more impacted than the Region and the State.

In the Regional Housing Plan, SEWRPC found that areas with high concentrations of minority populations experienced the highest rate of foreclosures. These areas also had the highest concentrations of low-income populations and high cost home loans.

Finding

Foreclosure

Historically, rates of foreclosure have been higher in Racine than the Region and the State. Higher rates of foreclosure were concentrated in higher minority, lower-income neighborhoods.

This is a direct impediment to fair housing choice due to the sub-prime housing crisis in 2007, which peaked in 2009.

Figure 3: Comparison of Foreclosure Cases in Racine County, the Region and the State: 2000-2009

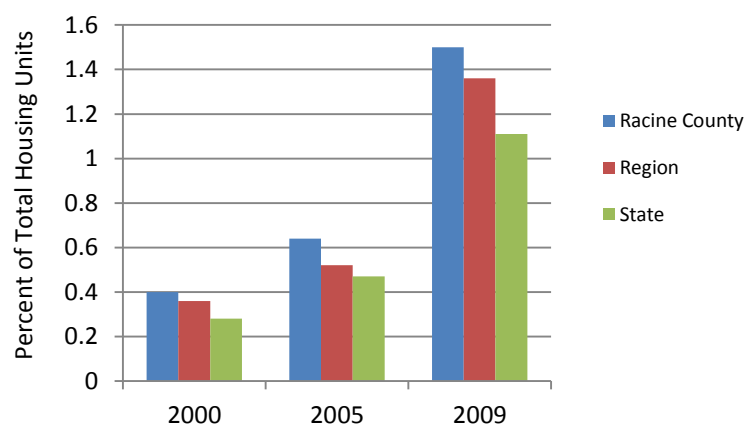


Table 17: Housing Foreclosures in the Region 2000 to 2009

County	Foreclosure Cases: 2000			Foreclosure Cases: 2005			Foreclosure Cases: 2009		
	Number	Percent	Cases as a Percent of Total Housing Units	Number	Percent	Cases as a Percent of Total Housing Units	Number	Percent	Cases as a Percent of Total Housing Units
Kenosha	294	10.1	0.49	476	10.8	0.72	1,236	10.6	1.82
Milwaukee	1,719	59.1	0.43	2,461	55.9	0.60	6,323	54.2	1.54
Ozaukee	64	2.2	0.20	91	2.1	0.26	266	2.3	0.74
Racine	299	10.3	0.40	509	11.6	0.64	1,221	10.5	1.5
Walworth	150	5.2	0.34	280	6.4	0.57	726	6.2	1.42
Washington	108	3.7	0.24	174	3.9	0.34	552	4.7	1.02
Waukesha	273	9.4	0.19	412	9.3	0.27	1,335	11.5	0.85
Region	2,907	100.0	0.36	4,403	100.0	0.52	11,661	100.0	1.36

Source: SEWRPC, US Census, UW-Extension Center for Community and Economic Development

Lending Policies and Practices

Another component of affordability is the ability to secure housing fairly. The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 to assist in determining if financial institutions are serving the housing needs of their communities, helping public officials distribute public-sector investments, and identifying possible discriminatory lending patterns. HMDA data was reviewed to identify and evaluate lending practices in relation to income and race/ethnicity in the City of Racine. This study focuses on 1-to-4 unit or manufactured homes.

Finding

Lending Policies and Practices

The HMDA shows a significant disproportion in the number of minority applications submitted and the rates of denied applications. Black/African American and Hispanic/Latino households are less likely to apply for loans and have high rates of denial. Rates of denial are 21.4% and 19.5%, respectively as opposed to an 11% rate for White applicants

These outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear whether these outcomes are the result of bias and discrimination (direct impediment) or simply less comfort, knowledge, and creditworthiness (indirect impediment).

In 2012, according to HMDA data, 11,083 applications for purchasing, refinancing or improving 1-to-4 unit or manufactured homes were received by the City. Most loans were for refinance and are not necessarily indicative of the ability to secure housing fairly. Table 18 summarizes tables that follow.

Table 18: Racial categories of all loan applicants for conventional loans, FHA, FSA/RHS, and VA loans. The final column compares applicants to the total racial makeup of City of Racine households.

Table 18: Home Mortgage Applications by Race/Ethnicity							
	All loans		Conventional		FHA, FSA/RHS and VA		Total City Race/Ethnicity Percentage
	Number	Percent	Number	Percent	Number	Percent	
White	1,637	89.6%	1,081	91.3%	556	86.5%	61.8%
Black/African American	56	3.1%	24	2.0%	32	5.0%	22.6%
Hispanic/Latino*	113	6.2%	63	5.3%	50	7.8%	20.7%
Native American/Alaskan Native**	4	0.2%	2	0.2%	2	0.3%	0.5%
Asian**	14	0.8%	11	0.9%	3	0.5%	0.8%
Native Hawaii/Pacific Islander**	3	0.2%	3	0.3%	0	0.5%	0.0%
* May be any combination of races **Sample size is too small to make a determination on trends. Source: HMDA and US Census							

HMDA data show that minority populations are less likely to apply for home financing than White households. When minority applicants do make application for home mortgage loans, their applications appear to have higher rates of denial than Whites.(Table 19a) The denial rate for Black/African American applicants was 21.4% and 19.5% for Hispanic/Latino applicants, both higher than the White applicant denial rate of 11%. In the Region, SEWRPC estimates the denial rate for Whites was 35% as opposed to 54% for Black/African Americans and 46% for Hispanic/Latinos using 2009 statistics. While the sample size for minority applicants in the City of Racine is small, it does indicate there is a difference in home mortgage acceptance rates for minority applicants compared to the acceptance rates for Whites. It also corresponds with documented discriminatory lending trends in the Region and with lending trends at the national level.^{xxxi} Without more detailed data comparing the mortgage denial rate of minority applicants to similarly creditworthy White applicants, however, it is difficult to tell if the rate of denial is biased due to race or based on the creditworthiness of the individual applicants.

Table 19a: Total Home Mortgage Application Types for 1-to-4-Family and Manufactured Home Dwellings

Total Loan Applications	Applications Received		Loan Originated		Approved but Not Accepted		Denied		Withdrawn/Incomplete	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Conventional	1,183	10.7%	958	12.1%	33	9.0%	127	7.8%	65	5.7%
FHA, FSA/RHS and VA	615	5.6%	467	5.9%	18	4.9%	81	5.0%	49	4.3%
Refinancing	8,891	80.5%	6,305	79.7%	300	81.5%	1,283	79.0%	1,003	88.1%
Home Improvement	349	3.2%	178	2.3%	17	4.6%	133	8.2%	21	1.8%

Source: HMDA and US Census

Table 19b: Conventional Loans by Race/Ethnicity

	Applications Received		Loan Originated		Approved but Not Accepted		Denied		Withdrawn/Incomplete	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
American Indian/Alaska Native**	2	100.0%	1	50.0%	-	-	1	50.0%	-	-
Asian**	11	100.0%	8	72.7%	2	18.2%	1	9.1%	-	-
Black/African American	24	100.0%	17	70.8%	-	-	6	25.0%	-	-
Native Hawaiian/Pacific Islander**	3	100.0%	2	66.7%	-	-	-	-	1	33.3%
White	1,081	100.0%	885	81.9%	29	2.7%	109	10.1%	58	5.4%
Hispanic/Latino*	63	100.0%	44	69.8%	2	3.2%	14	22.2%	3	4.8%

* May be any combination of races **Sample size is too small to make a determination on trends.

Source: HMDA and US Census

Table 19c: FHA, FSA/RHS and VA Loans by Race/Ethnicity

	Applications Received		Loan Originated		Approved but Not Accepted		Denied		Withdrawn/Incomplete	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
American Indian/Alaska Native**	2	100.0%	1	50.0%	-	-	1	50.0%	-	-
Asian**	3	100.0%	3	100.0%	-	-	-	-	-	-
Black/African American	32	100.0%	21	65.6%	2	6.3%	6	18.8%	3	9.4%
Native Hawaiian/Pacific Islander**	-	-	-	-	-	-	-	-	-	-
White	556	100.0%	426	76.6%	16	2.9%	71	12.8%	43	7.7%
Hispanic/Latino*	50	100.0%	36	72.0%	2	4.0%	8	16.0%	4	8.0%

* May be any combination of races **Sample size is too small to make a determination on trends.

Source: HMDA and US Census

Table 19d: Total Home Mortgage Loans by Race/Ethnicity

	Applications Received		Loan Originated		Approved but Not Accepted		Denied		Withdrawn/Incomplete	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
American Indian/Alaska Native**	4	100.0%	2	50.0%	-	-	2	50.0%	-	-
Asian**	14	100.0%	11	78.6%	2	14.3%	1	7.1%	-	-
Black/African American	56	100.0%	38	67.9%	2	3.6%	12	21.4%	3	21.4%
Native Hawaiian/Pacific Islander**	3	100.0%	2	66.7%	-	-	-	-	1	33.3%
White	1,637	100.0%	1,311	80.1%	45	2.7%	180	11.0%	101	11.0%
Hispanic/Latino*	113	100.0%	80	70.8%	4	3.5%	22	19.5%	7	6.2%

* May be any combination of races **Sample size is too small to make a determination on trends.

Source: HMDA and US Census

Government-Assisted Housing

Government-assisted housing (subsidized housing vouchers, subsidized housing units and units funded through the Low Income Housing Tax Credit (LIHTC) program should ideally be located in diverse locations to provide housing location choice for low-income City residents. “Subsidized housing” is government assistance in the form of vouchers where the subsidy is attached to the household receiving assistance. Subsidized housing also includes project-based assistance where the financial subsidy is attached to a housing unit.

The Lowing-Income Housing Tax Credit (LIHTC) program is also used to provide affordable housing for low- and moderate-income households. The program provides federal tax credits that can be used as an incentive for developers to construct or rehabilitate affordable housing units.

This section includes an analysis of demand for subsidized housing as well as the amount of voucher and subsidy-assisted housing units in the City of Racine. (Map 13) The subsidized and LIHTC units inventoried in this section are primarily in multifamily housing complexes.

Voucher –Based Assistance

The U.S. Department of Housing and Urban Development (HUD) Section 8/Housing Choice Voucher Program is the federal government’s primary voucher-based housing assistance program. The voucher program provides affordable housing choices for low-income families by providing rental assistance that allows families to reside in privately-owned rental units. These units are usually found in multifamily housing developments, though vouchers may also be used for single-family and two-family rental units if they meet program requirements. Typically, a public housing authority (PHA) administers the voucher program with annual funding from HUD. The PHA generally pays the landlord the difference between 30% of a family’s gross monthly household income and the PHA-determined payment standard, about 80% - 100% of the HUD-determined Fair Market Rent (FMR). Households may use a voucher at any location within an administration area where the landlord is willing to participate in the program and the housing unit meets program requirements.

HUD sets FMRs to assure that a sufficient supply of rental housing will be available to program participants. To accomplish this objective, FMRs must be high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income households as possible.

Findings

Government Assisted Housing

Housing Choice Voucher holders are more present in the central City. Similarly, govrenmentassisted properties are also located in the central City. These neighborrhoods are concentrated areas of impoverished minority, elderly and disabled populations.

This is a direct impediment to fair housing choice as the development of these properties is not been spatially distributed throughout Racine, Racine County, and the Southeastern Wisconsin Region. Their location directly limits the ability of these popuations to have access to quality and affordable housing choice.

Demand for Government-Assisted Housing

In the region the total available government-assisted housing is 45,676 units and there is a potential need of 141,719 units. The same is true for Racine County, the total available number of units is 4,130 and there is a demand for approximately three times that of 12,817 units.

This is an indirect impediment to fair housing choice as the underlying causes for the need are the low annual incomes due to low educational attainment, high unemployment, and other factors attributed to poverty.

The Housing Authority of Racine County (HARC) administers the Section 8 Housing Choice Voucher Program in the City of Racine. According to the 2012 Public Use Micro-data Sample (PUMS) there were approximately 1,340 vouchers available to low-to-moderate-income individuals and families in the City of Racine. The average number of persons in a household receiving a HUD Section 8 Housing Choice Voucher is 2.72 and the average household income is \$12,800. More than 85% of voucher holders are minorities with 73% identifying as Black/African American and 13% identifying as Hispanic/Latino. 88% of households are headed by a female; 60% of households headed by a female have children. 31% of voucher recipients identify as disabled. The average waiting period to receive a voucher is nearly 26 months.

There is a much greater demand for vouchers than supply in the Region. It is difficult for PHAs to estimate the length of time a family will have to wait for a voucher because each PHA has a maximum amount of funding budgeted for assistance. The amount of money that will be needed to provide rent assistance to families varies by family income. In addition, not all of the applicants on a waiting list will qualify for the program which complicates voucher waiting-time estimates.

Project-Based Assistance

Project-based housing assistance includes housing developments that receive financial assistance from HUD. Project-based housing units are typically in multifamily developments, including attached single-family units such as townhomes. Occupancy is restricted to low-income families and individuals.

In the City of Racine there are 19 project-based developments with 1,212 assisted units. 343 units are designated as family units, 655 are designated as elderly, and 214 are designated for disabled individuals. The average number of persons in a unit is 1.5 and the average income of the assisted household is approximately \$11,400 per year. In these developments approximately 49% identify as minority; 44% percent identify as Black/African American and 8% identify as Hispanic/Latino.

Low Income Housing Tax Credit (LIHTC) Assistance

The LIHTC program is an indirect federal subsidy used to finance the development of affordable housing for low- and moderate-income households. The LIHTC Program, based on Section 42 of the Internal Revenue Code, was enacted by Congress in 1986 to provide the private market with an incentive to invest in affordable rental housing. Federal housing tax credits are awarded to developers of qualified projects. Developers sell these tax credits to investors to raise capital for their projects, which reduces the debt the developer would otherwise have to borrow. A tax credit property can offer more affordable rents because the debt is lower. The Wisconsin Housing and Economic Development Authority (WHEDA) administers the LIHTC program in Wisconsin and develops the Qualified Allocation Plan (QAP), a method used to award tax credits to developers. The QAP includes scoring criteria for developments and funding set aside for specific development types.

There are 863 LIHTC assisted units in the City of Racine. Of these units, 449 are designated for family use, 332 are designated for elderly use, and 92 are designated as “other”. The “other” category includes units for complexes for persons with disabilities, homeless/majority homeless, and residential care apartment complexes (RCAC).

Tax-Exempt Bonds

Tax-exempt bonds are bonds where the interest earned by the bondholder is exempt from federal, and often state and local, taxes. Because the interest is tax-exempt, debt has a lower interest rate than traditional financing. These bonds are used to attract private investment for projects that have some public benefit. Each state receives an annual allocation to be allocated to issuers of private activity bonds. WHEDA administers these tax-exempt bonds in Wisconsin. In the City of Racine, there are seven multifamily properties with 468 units that have been acquired, constructed, rehabilitated, or refinanced with tax-exempt bonds. These developments must be housing for families, elderly, or persons with disabilities, and must meet the LIHTC program affordability requirements.

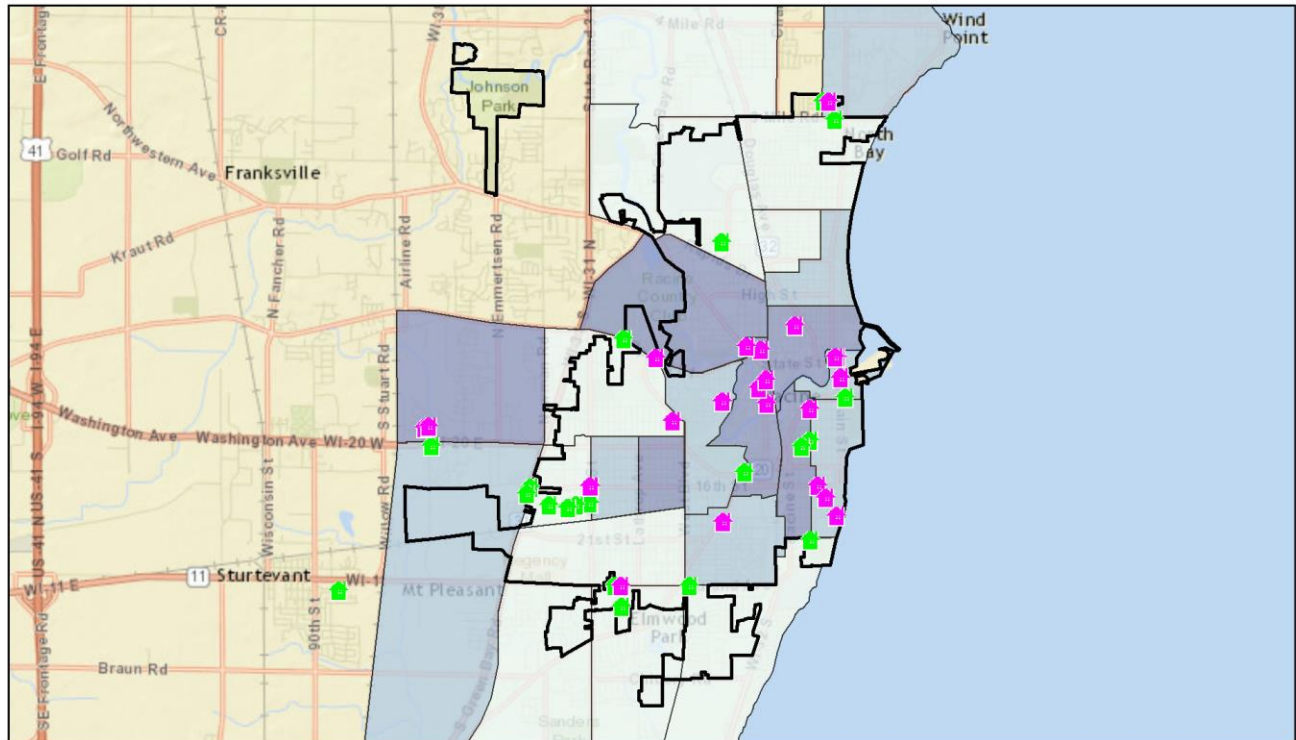
Need for Government-Assisted Housing

A lack of vacant housing units and long waiting lists for subsidized housing vouchers and units demonstrates that there is a high demand for government-assisted housing within the City of Racine. This data does not necessarily reflect the extent of the need for housing, however. Previous sections of the AI demonstrate that existing households in Racine have housing problems such as a lack of plumbing and kitchen facilities, overcrowding, and high cost burden. The data show that while the number of households affected by these issues is small, almost all households experience a high cost burden. These numbers suggest that market-rate housing alone cannot alleviate the housing problems in the City of Racine or the Southeastern Wisconsin Region.

Table 20: Government-assisted housing supply and demand in Racine and the Region. The demand for government assisted housing exceeds the total availability by 100,000 units. The total available government-assisted housing is 45,676 units and there is a potential need of 141,719 units. In Racine County, there are 4,130 available units and there is demand for approximately three times that number (12,817).

County	Households			Government Assisted Housing						Potential Need
	Extremely Low Income	Very Low Income	Total	Section 8 Housing Choice Vouchers	Subsidized Housing Units		LIHTC Housing Units		Total	
					Family	Elderly/Special Needs	Family	Elderly/Special Needs		
Kenosha	6,995	6,636	13,634	1,261	272	1,033	147	402	3,115	10,519
Milwaukee	64,149	49,978	114,127	8,071	6,160	8,991	4,188	2,854	30,264	83,683
Ozaukee	1,947	2,666	4,613	100	118	278	62	403	961	3,652
Racine	8,394	8,553	16,947	1,539	416	1,065	495	615	4,130	12,817
Walworth	5,211	4,184	9,395	410	508	354	86	308	1,666	7,729
Washington	3,843	4,308	8,151	437	212	479	179	298	1,605	6,546
Waukesha	9,572	10,956	20,528	1,243	760	785	194	953	3,395	16,593
Total	100,111	87,284	187,395	13,061	8,446	12,985	5,351	5,833	45,676	141,719
Sources: US Census, HUD, USDA, WHEDA, PHAs and SEWRPC										

CPD Maps - LIHTC Properties, HUD MFH Properties and Section 8 Voucher Concentration



August 6, 2014

LIHTC Property

Multifamily Properties - Assisted

Override 1

VoucherConcentration

HCV_PCT_RENTER_OCC_UNITS

<5.93%

5.93-11.61%

11.61-20.28%

1:109,879
0 0.75 1.5 3 mi
0 1.5 3 6 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Map 13: LIHTC, HUD MFH Properties and Section 8 Housing Choice Voucher Concentration

Map 13: Government-assisted housing in the City of Racine is concentrated in the center of the city.

Emergency Shelter Needs and Facilities

Homelessness is a problem that persists in the City of Racine, the Region, the State, and the Nation. Major reasons for homelessness include mental illness, domestic violence, substance addiction, and lack of income and/or housing that is unaffordable to low- to moderate-income individuals and households. The economic recession and long-term unemployment, part-time employment and wage cuts have caused many households to be unable to meet mortgage or rent payments. Emergency shelters and transitional housing facilities provide temporary housing for those experiencing homelessness or risk of homelessness. The data in this section is comprised of information collected by Wisconsin Service Point (WISP), a Homeless Management Information System (HMIS). WISP records all persons that have received assistance from homeless service providers in the Region throughout the year 2010.

There are some concerns that existing temporary or emergency shelter facilities in the Region are not adequate. Data on homeless persons is divided into two categories: persons receiving emergency shelter assistance, and those receiving transitional or supportive services. HUD defines an “emergency shelter” as any facility with the primary purpose of providing temporary or transitional shelter for the homeless in general or for specific populations of the homeless. The second category contains data on individuals receiving transitional housing services, permanent supportive housing services, and homelessness prevention services such as rent assistance and foreclosure prevention, or other supportive services such as food banks and programs for victims of domestic abuse.

“Transitional housing” is defined as a project with the purpose of facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). “Permanent supportive housing” is defined as long-term, community-based housing that has supportive services for homeless individuals with disabilities. It is important to note that the second category includes persons considered to be precariously housed as well as persons who are literally homeless. A person considered precariously housed is on the edge of becoming literally homeless and may be sharing housing with friends or relatives or paying an extremely high percentage of their resources toward rent. This group is often characterized as being at imminent risk of becoming homeless.

It is also important to note that this data does not comprise a complete representation of the Region’s homeless population, as many homeless persons may not have been counted because they did not receive assistance from a homelessness service provider in 2010. A significant proportion of the homeless population classified as “unsheltered” live in vehicles, abandoned buildings, makeshift housing, and other places not meant for human habitation. There may also be a significant number of people staying with relatives or friends who cannot afford housing of their own. Families and individuals who are “doubled up” with family and friends are not considered homeless by HUD but could be at risk of homelessness. Additionally, only homelessness service providers that receive funding from HUD are required to submit client data to WISP. WISP collects data for approximately 80% of all emergency shelter beds in the State.

Finding

Emergency Shelter Needs and Facilities

Homelessness nearly equally affects Black/African American and White individuals, but disproportionately affects unaccompanied men and those individuals with disabilities. There appears to be a need for additional resources for both unaccompanied and accompanied men as well as those with disabilities. The unmet needs include shelter, but also connection to employment services, but not necessarily workforce development services, as education attainment is relatively high (48% with high school diplomas; 23% with college experience/degrees).

This is a direct impediment to fair housing choice as there are limited options for emergency shelter for men and disabled individuals.

The Continuum of Care (CoC) for Racine and Racine County coordinates homelessness prevention shelters and services. In 2010, there were 918 persons in emergency shelter and 2,050 in transitional housing or receiving other services. A total of 2,986 persons were served. The age distribution of the persons sheltered or receiving assistance is: 26% under 19-years-old, 39% 19- to 40 years old, and 35% over 41 years old. Men represent 56% of the total persons served and women represent 44% of the total. The highest percentage of those assisted are Black/African American (49%) followed by White (almost 42%). Most of the adults receiving assistance were unaccompanied (i.e. alone) representing almost 90% of adults served; 10% of adults were with children; 12% of adults were military veterans. Total length of stay at shelters was:

- 31.5% for less than one week
- 27.6% for one week or less than one month
- 24.2% for one month to three months
- 5.9% for three to six months
- 10.8% for six months or longer

Educational attainment is only a slight indicator of being homeless or at risk of homelessness: 29% had less than a high school education, 48% were high school graduates, and 23% had some college experience or a college degree. Employment status is a larger indicator of homelessness or risk of homelessness: 7% were employed full-time, 8% were employed part-time, 67% were unemployed, and 18% were not in the labor force. Disability is another indicator of homelessness or risk of homelessness. Of the total adults served, 44% had a disability and 56% did not.

There are 11 emergency shelters and transitional housing facilities with 260 beds in the City of Racine. Of the total beds available there are 94 (36%) beds available to women and children, 60 beds (23%) available to unaccompanied men, 16 beds (5.5%) available to youth, and 90 (23%) available to anyone. Of these beds, 30 (11.5%) are supportive housing available to those with disabilities. Men accompanied by children are given a motel voucher. An inventory of shelters is provided below:

- Catherine Marian Housing Inc./Bethany Apartments Transitional Housing – 34 beds
- Center for Veteran's Issues Ltd. CVI Racine College Avenue Permanent Supportive Housing – 18 beds
- Homeless Assistance Leadership Organization, Inc. (HALO). Men's Shelter Emergency Shelter – 60 beds
- HALO Women and Children's Shelter Emergency Shelter – 60 beds
- HALO Permanent Housing Program Permanent Supportive Housing – 12 beds
- HALO THP Family Units Transitional Housing – 33 beds
- HALO THP Single Units Transitional Housing – 9 beds
- Love and Charity Mission Emergency Shelter – 18 beds
- SAFE Haven of Racine SAFE Passage Transitional Housing – 8 beds
- SAFE Haven of Racine Youth Shelter Emergency Shelter – 8 beds
- Women's Resource Center Women and Children's Emergency Shelter – 8 beds

There are many challenges associated with homelessness services. Federal funding for homelessness services increased in response to the recession, but high unemployment and underemployment may increase the number of people who are homeless or at risk of homelessness. People staying in the homes of relatives or friends, but are not considered homeless by HUD, may result in an underestimate for the demand for homelessness services. Supportive housing often faces neighborhood opposition on the basis of reduced

property values and a fear of crime, despite evidence from numerous studies showing that supportive housing does neither.^{xxxii} Although coordinated service provisions required for Continuum of Care planning process has improved services, efforts still need to address the root causes of homelessness.

Accessible Housing

A need for housing for persons with disabilities was identified in a previous section of this report. This section takes a look at the housing laws regarding accessible housing and construction practices. In addition, an estimate has been made for the supply and demand for accessible housing.

In the Demographic Profile it was noted the age group with a prevalence of disability are those who are 65 and older. Census tracts containing the highest concentrations of persons with disabilities are in Milwaukee, Racine, Kenosha, West Bend and Waukesha. Urban areas tend to have higher percentages of disabilities due to availability of transit and other services. These areas also have high concentrations of poverty which often overlap due to the lower incomes of persons with disabilities. The aging of this segment of the population may require additional units of accessible housing.

Federal and State Laws.

Persons with disabilities are a legally protected class and basic housing accessibility requirements are included in the Fair Housing Act (FHA). All multifamily buildings of four or more units constructed after March 31, 1991 must be accessible at the time they are ready for occupancy. Buildings with an elevator must have all units made accessible; those without an elevator must only have the first floor units made accessible. Note: the FHA is described in more detail in the introduction of this AI and in the Fair Housing Profile.

HUD’s *Fair Housing Accessibility Guidelines and Fair Housing Act Design Manual* provide detailed technical assistance with guidance on design standards for entrances, routes, common areas, doors, thresholds, bathrooms, kitchens, and environmental controls accessibility.

Section 504 of the Rehabilitation Act of 1974, as amended, is intended to eliminate discrimination against persons employed by federal agencies or in programs that receive federal funding. Section 504 applies to housing as well. It prohibits discrimination on the basis of disability, requires housing providers to provide reasonable accommodations unless it would cause an undue administrative or financial burden, ensures new housing is accessible and existing housing is made accessible at rehabilitation, and requires education of residents on availability of units. An additional set of laws, The Uniform Federal Accessibility Standards (UFAS), were developed to provide consistency in the provision of accessibility in federal construction and rehabilitation of buildings.

The Americans with Disabilities Act (ADA) enacted in 1990 prohibits discrimination based on disability. The ADA extends the requirements of Section 504 and seeks to eliminate barriers to persons with disabilities in private buildings that are open to the public.

Finding

Accessible Housing

The number of elderly and disabled individuals is project to increase in Racine and the region. A greater demand for accessible housing is expected. There are presently 12,157 persons that are disabled in the City of Racine and up to 9,235 accessible units available in Racine County.

This is a direct impediment to fair housing choice as accessible housing options appear to be limited due to lack of availability. This may be further compounded by the age of housing stock in the City as older housing tends to have fewer accessibility features.

Architectural Barriers Act (ABA) enacted in 1968 provides that buildings and facilities that are constructed, leased or financed by the federal government be made accessible to persons with mobility impairments. ABA uses UFAS as its basis for accessibility standards.

Wisconsin Open Housing Law also provides protections for persons with disabilities. The State statutes that create this law state that a disabled person must be allowed to make reasonable accommodations to a unit and accessible units must be included in multifamily housing developments. Failure to follow either of these law provisions is considered a discriminatory act. These law requirements apply statewide to buildings with three or more units.

Construction Practices that Promote Accessible Housing

Design concepts such as universal design and visitability, though not required by law, are gaining increased awareness within the housing industry and the general public as desired features to increase accessibility. “Universal Design” (UD) is the design of products, buildings, and environments to be useable by people of all ages and physical capabilities without the need for adaption or specialized design. UD construction practices include installing environmental controls lower than the traditional placement and installing outlets higher to be reached by persons in wheelchairs. UD also includes creating wider door widths to accommodate wheelchairs or other mobility devices, installing lever or u-shaped hardware on doors and drawers, and providing zero-step entries. Many of these adaptations are not costly and can be easily incorporated into a traditional building design. “Visitability” refers to single-family or owner-occupied housing to be lived in or visited by persons with mobility impairments. Many of the UD design concepts are incorporated in visitability.

Supply of Accessible Housing Units

SEWRPC examined the number of private multifamily units constructed and number of government-assisted housing units. They also inventoried other assisted housing options for persons with disabilities including community based residential facilities (CBRF), residential care apartment complexes (RCAC), home health care services, and housing for disabled veterans. SEWRPC found that there are a total of 104 assisted housing option facilities that can accommodate 1,369 persons in the City of Racine. In Racine County there are 162 units of assisted housing options that can accommodate 2,363 persons. Additionally, there are 969 units of government-assisted units in Racine County. Racine County also had 3,330 units of multifamily housing in buildings greater than 3 units built after 1990 (the effective date of the Americans with Disability Act). SEWRPC also estimated that there are 38 senior housing developments in Racine County totaling 2,573 additional units.

Demand for Accessible Housing Units

The demand for accessible housing is difficult to estimate because there is no tracking system for units that have been built as “accessible” or those that have been converted to “accessible”. SEWRPC estimates that there could be up to 61,640 multifamily units that are accessible to persons with mobility impairments in the Southeastern Wisconsin Region. In Racine County there may be up to 9,235 accessible units with the majority of units located within the City of Racine. There are a total of 12,157 persons with a disability in the City of Racine and 20,683 persons with a disability in Racine County. The estimated number of accessible units available may not meet the current demand.

V. Employment and Transportation Profile

Employment centers and transportation systems should be examined spatially to identify if employment opportunities are accessible via public transit from a reasonable set of affordable housing alternatives. This section examines employment conditions and the location of employment centers.

Largest Employers

Table 21 lists the largest employers in the City of Racine according to number of employees. It reflects Racine's unique industry and employment patterns. Racine's large manufacturing presence is represented on this list with six of the top employers in this industry. Map 15 illustrates the location of most of the employment centers in the City of Racine and the Region.

Unemployment Rates

The City of Racine has a number of large employers that offer a diverse mix of skilled and unskilled employment opportunities. Racine has been economically challenged by the recent recession that started in 2007 and peaked in 2009. The unemployment rate has been significantly higher for the City of Racine than Racine County and the State of Wisconsin, although the rate of unemployment has been slowly falling along with the County and State rates. The gap between the City rate and State rate has historically been larger during times of economic recession and smaller as the economy improves. High unemployment rates are in part a reflection of Racine's large manufacturing base that has declined over the past decades. Manufacturing is also an industry more reactive to economic changes than others. ^{xxxiii}

Wages by Industries

Table 22: Average annual wage by industry in Racine County and the State. Racine's average annual wage is almost 4% higher than the State average and increased 2.2% in 2012, slightly less than the statewide annual wage growth of 2.4%. Racine's high overall wage is due to the high manufacturing wages, which are 30% higher than the state average. Wages in Racine County are also somewhat higher in natural resources and public administration than the State average, but those wages do not significantly raise the countywide

Finding

Employment and Transportation

City of Racine minority and disabled populations both earn less than their counterparts, but also rely more heavily on public transit to get to and from employment opportunities.

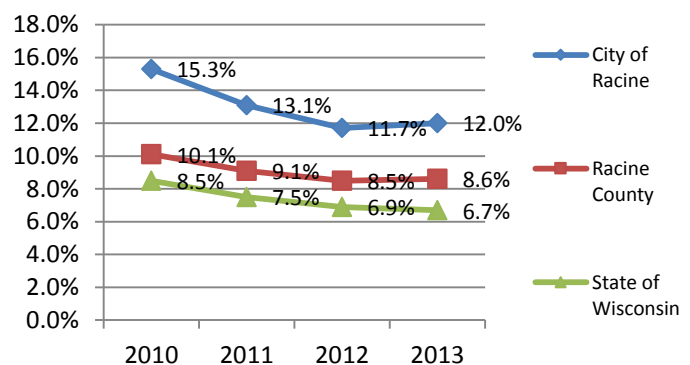
This is a direct impediment to fair housing choice as earning potential has a direct impact on the affordability of housing.

Table 21: Racine's Largest Employers

Employers	Total Employees
All Saints Health Care System	2,661
S.C. Johnson & Son, Inc.	2,496
Racine Unified School District	2,500
CNH America LLC	2,500
InSinkErator	1,000
Ruud Lighting Inc. – A Cree Company	750
City of Racine	737
Modine Manufacturing Co.	495
Twin Disc, Inc	435
Society's Assets Inc.	334
Racine Yacht Club Inc.	325
WI Dept. of Workforce Development	300
Gateway Technical College	275

Source: The Business Journal & City of Racine

Figure 4: Unemployment Rates



average as those sectors are relatively small. High manufacturing wages are not the result of high wages paid to hourly production workers, but rather the large share of management and professional workers that comprise the County's manufacturing workforce. Because so many large manufacturers are based in Racine, very high wages paid to management and professional staff pulls up the average County wage for the entire manufacturing workforce.^{xxxiv}

Table 22: Average Annual Wages by Industry 2012

	Wisconsin Avg. Annual Wage	Racine Avg. Annual Wage	Percent of Wisconsin Annual Wage
All Industries	\$41,985	\$43,618	103.9%
Natural Resources	\$33,347	\$33,517	101.4%
Construction	\$51,670	\$48,390	93.7%
Manufacturing	\$52,413	\$68,426	130.6%
Trade, Transportation, and Utilities	\$35,946	\$31,795	88.5%
Information	\$56,015	\$41,512	74.1%
Financial Activities	\$58,493	\$52,480	89.7%
Prof. and Bus. Services	\$49,451	\$35,701	72.2%
Education and Health	\$43,781	\$41,997	95.9%
Leisure and Hospitality	\$15,221	\$12,925	84.9%
Other Services	\$23,598	\$22,618	95.8%
Public Administration	\$42,198	\$45,667	108.2%

Source: WI DWD, Workforce Training, QCEW, June 2013

Occupations by Race/Ethnicity

Table 23: The occupations of persons aged 16 and over compared to median household income from the 2008 to 2012 American Community Survey (ACS) divided by race. White employees are fairly evenly distributed across all industries whereas Black/African American and Hispanic/Latino employees are concentrated in the service and support industries. The wages in the service and support industries generally pay less per year than other industries.

Table 23: Occupations by Race/Ethnicity, Persons 16 Years and Older

	White		Black/African American		Hispanic/Latino		Total
Officials and managers	2,160	9.0%	310	4.3%	270	4.0%	2,890
Professionals	3,835	16.0%	675	9.3%	320	4.8%	5,025
Technicians	810	3.4%	55	0.8%	40	0.6%	935
Sales Workers	2,705	11.3%	630	8.7%	610	9.1%	4,010
Administrative Support Workers	3,890	16.3%	985	13.6%	965	14.4%	6,035
Construction/Craft Workers	2,440	10.2%	215	3.0%	495	7.4%	3,170
Production Operative Workers	3,955	16.5%	1,685	23.3%	1,870	27.9%	7,720
Laborers and Helpers	845	3.5%	390	5.4%	735	11.0%	2,020
Service Workers	3,160	13.2%	2,060	28.5%	1,320	19.7%	6,810
Unemployed	125	0.5%	215	3.0%	85	1.3%	425
Total	23,925	100.0%	7,220	100%	6,710	100%	39,040

Source: ASC 2008-2012

Table 24: A Black/African American employee living in Racine earns, on average, 47 cents on every dollar a White employee earns. A Hispanic/Latino employee living in Racine on average earns 78 cents on every dollar a White employee earns.

Table 24: Median Household Income by Race/Ethnicity, Persons 16 Years or Older			
White	Black/African American	Hispanic/Latino	All Persons
\$47,368	\$22,690	\$36,789	\$38,789
Source: ACS 2008-2012			

SEWRPC Employment Projections

SEWRPC compared employment in major industry groups with projections for the future of those groups in the year 2035. The projections were based on past industry trends and available indicators of future trends nationally and within the State and Region. The future available labor force in the Region was also considered in the preparation of the employment projections.

SEWRPC population projections suggest that the regional labor force may level off as the baby-boom generation reaches retirement age. The number of jobs is expected to level off proportionally with the labor force. Under the SEWRPC intermediate projection, total employment in the City will decrease by 4,200 jobs, or 10%, from 44,200 jobs in 2000 to 40,000 jobs in 2035. A change may also occur in the types of jobs available in the years ahead for the City, County, and Region. The largest increases are projected to be in the service sector (business, health, social, recreational, and other services) while employment in the industrial sector—including manufacturing, wholesaling activities, and construction jobs—is projected to decrease.

Transportation Options

Households without a vehicle due to economic circumstance, disability, or choice are have reduced access to jobs, services, and amenities. Convenient access to public transit is essential to many households and reduced access to public transportation can greatly limit housing and employment options.

Means of Transportation to Work

The 2008 - 2012 ACS provides data on how employed persons over the age of 16 years get to and from work. The majority of City of Racine residents drive to work followed by carpooling, public transit (including taxis), walking, other means (i.e. bicycle), or working from home. (Figure 5)

Household Vehicle Availability

Table 25: A higher percentage of Racine residents do not have vehicles compared to residents in the County and Region.

Table 25: Household Vehicle Availability						
	Vehicle Available		No Vehicle Available		Total Households	
City of Racine	28,056	88.5	3,656	11.5	31,712	100.0
County of Racine	70,229	93.7	4,746	6.3	74,975	100.0
The Region	713,948	91.3	68,169	8.7	782,117	100.0

Public Transit

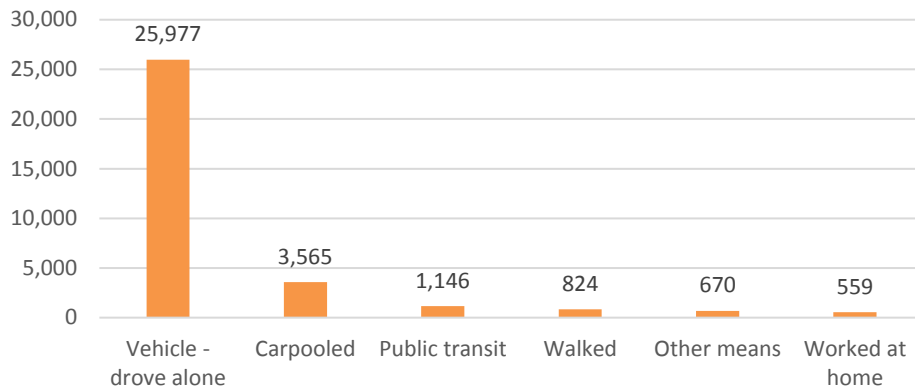
Urban public transit may be divided into rapid, express, and local levels of service. Rapid transit has relatively high operating speeds and relatively low accessibility. It is intended to provide fast and convenient transportation along heavily travelled corridors between major activity centers such as employment centers. Express transit provides a greater degree of accessibility at somewhat slower speeds than rapid transit. Local transit service is characterized by a higher level accessibility and low operating speeds.

The City of Racine is primarily served by Belle Urban System (BUS), a local transit service. The city-owned transit system maintains a fleet of 42 buses operating on nine bus routes throughout Racine and outlying areas seven days a week. BUS also provides paratransit services through a contract with Laidlaw Transit Services. Wisconsin Coach Lines offers a rapid transit fixed route bus service between Racine, Kenosha and Milwaukee.

Commuting Times

The mean travel time to work for City of Racine residents is approximately 21 minutes according to the 2008 - 2012 ACS. However, those who rely on public transit may have layover times of 30 to 60 minutes on weekdays and 60 to 90 minutes on the weekends.

Figure 5: Means of Transportation to Work

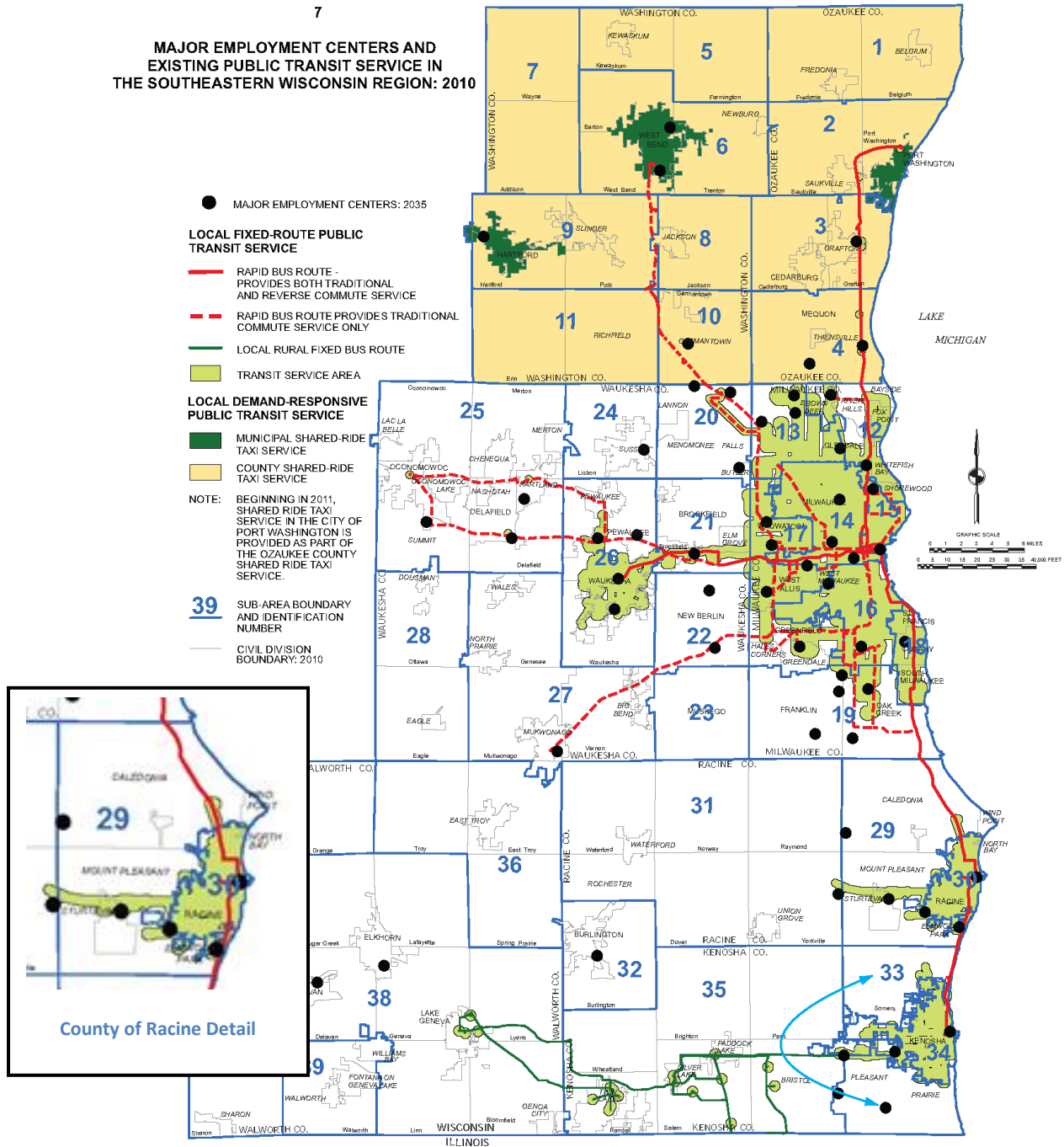


Map 14: Belle Urban System (BUS)

Source: Belle Urban System

Map 14: Service routes for the Belle Urban System (BUS) in the City of Racine and surrounding areas.

MAJOR EMPLOYMENT CENTERS AND EXISTING PUBLIC TRANSIT SERVICE IN THE SOUTHEASTERN WISCONSIN REGION: 2010



Map 15:
Employment Centers and Public Transit Service

Source: SEWRPC.

Source: SEWRPC

Map 15: Employment centers and existing transit service areas throughout Southeastern Wisconsin. The City of Racine is fairly evenly served geographically by transit services.

VI. Housing-Employment-Transit Profile

Jobs/Housing Balance

The jobs/housing balance generally refers to a desirable ratio of jobs to housing units. This type of measurement is standardly used throughout the Nation in community transportation, housing, land use and comprehensive planning efforts. Adequate housing near employment centers to meet workforce demand (a balanced jobs/housing ratio) is desired.

Finding

Housing-Jobs Balance

The City of Racine, in comparison to the Region, shows no jobs/housing imbalance in terms of affordable housing options for its low- to moderate income workforce.

There is no impediment to fair housing choice in this area.

Major Employment Centers

The largest concentrations of jobs are located in commercial and industrial centers. (Map 15) SEWRPC defined “commercial and industrial centers” as areas containing a concentration of commercial and/or industrial land having at least 3,500 total jobs, 3,500 industrial jobs, 3,500 office jobs, or 2,000 retail jobs in the *Southeastern Wisconsin Regional Housing Plan:2035*. The Regional Housing Plan focuses on these large employment centers because they represent a large number of employment opportunities.

Map 16 shows major employment centers overlaid on monthly rental housing unit costs. Map 17 shows major employment centers overlaid on monthly owners cost for housing units with a mortgage. Racine housing costs are lower than the region.

Current Jobs/Housing Balance

SEWRPC measured the ratio of the number of jobs to housing units to estimate areas that may not have enough affordable housing for workers that want to live near their job location. A jobs/housing ratio of 0.8 to 1.2 implies that an area is balanced between employment opportunities and affordable housing availability (a perfect jobs/housing balance value is 1.0). A jobs/housing ratio of more than 1.2 implies that an area may not have enough housing for its workers and a ratio less than 0.8 indicates there may be an oversupply of housing relative to employment. In 2000, the City of Racine had a jobs/housing ratio of 1.2, indicating no imbalance between jobs and housing.

It is also important to look at the wage characteristics of jobs and the costs characteristics of housing types. A difference of ten percentage points between wage levels and housing type (cost) indicates an imbalance between wages and housing costs. The information provided by SEWRPC on Racine indicates that low wage/low cost housing and moderate wage/moderate cost housing are balanced. It finds that there is a potential imbalance between higher wages/high cost housing. This imbalance could indicate there is a higher percentage of higher-wage employment than higher-cost housing. This imbalance is not explored in depth because the Regional Plan focuses primarily on lower- and moderate-wage jobs and affordable housing as they relate to housing problems faced by protected classes.

Map 90

MAJOR EMPLOYMENT CENTERS AND MONTHLY RENTAL HOUSING UNIT COST BY HOUSING ANALYSIS AREA IN THE SOUTHEASTERN WISCONSIN REGION: 2005-2009

● MAJOR EMPLOYMENT CENTERS: 2035

MEDIAN MONTHLY RENT: 2005-2009

\$601 - \$700

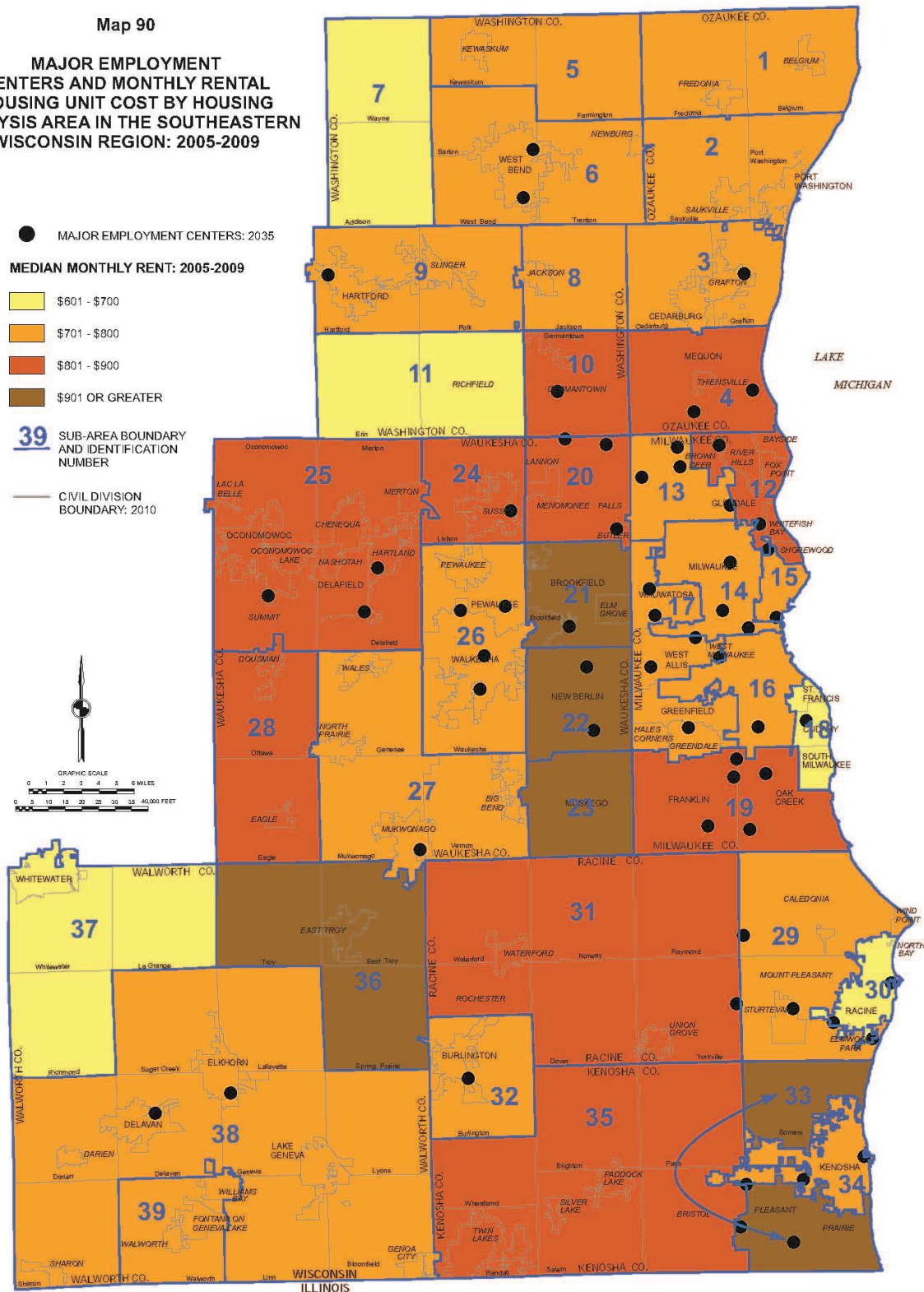
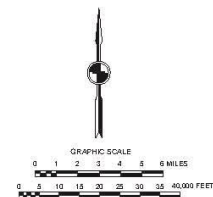
\$701 - \$800

\$801 - \$900

\$901 OR GREATER

39 SUB-AREA BOUNDARY AND IDENTIFICATION NUMBER

— CIVIL DIVISION BOUNDARY: 2010



Map 16: Major Employment Centers Overlaid on Rental Housing Units

Source: SEWRPC

Map 91

**MAJOR EMPLOYMENT CENTERS
AND MONTHLY OWNER COST FOR
HOUSING UNITS WITH A MORTGAGE
BY HOUSING ANALYSIS AREA IN THE
SOUTHEASTERN WISCONSIN
REGION: 2005-2009**

● MAJOR EMPLOYMENT CENTERS: 2035

**MEDIAN MONTHLY HOUSING
COST: 2005-2009**

\$1,201 - \$1,400

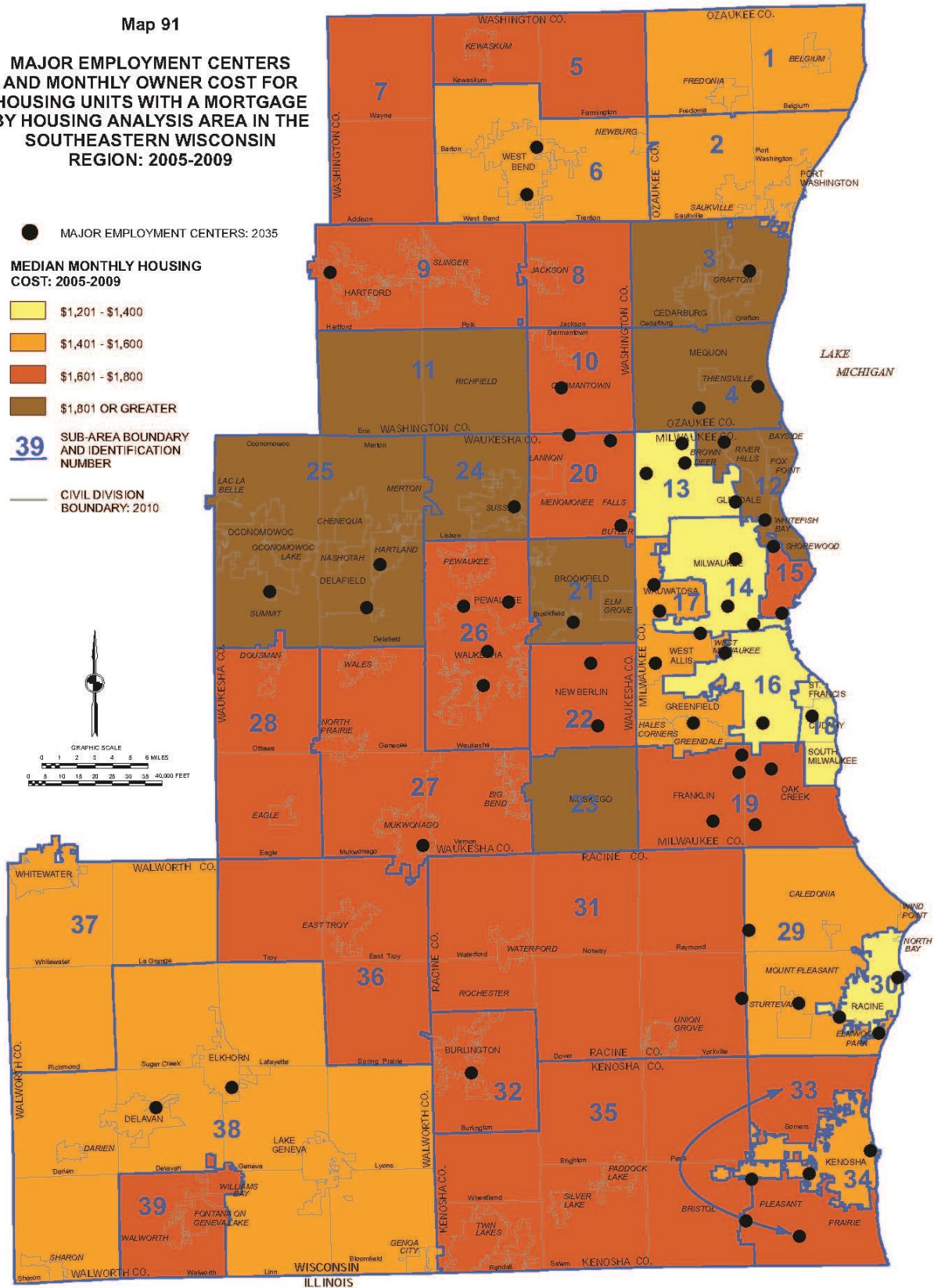
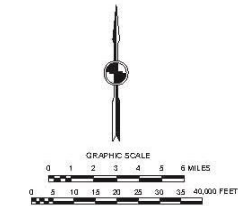
\$1,401 - \$1,600

\$1,601 - \$1,800

\$1,801 OR GREATER

39 SUB-AREA BOUNDARY
AND IDENTIFICATION
NUMBER

— CIVIL DIVISION
BOUNDARY: 2010



Map 17: Major Employment Centers Overlaid on Monthly Owner Costs

Source: SEWRPC

Jobs/Housing Balance and Housing Cost Burden

The City of Racine has a balanced job/housing ratio but also has higher unemployment rates and relatively low median earnings compared to the Region, State, and Nation. The Regional Housing Plan suggests that increased access to good-paying jobs and workforce development, rather than additional multi-family housing, may be necessary to reduce the high housing cost burden on Racine residents.

Jobs-Housing Balance and Concentrations of Minority and Disabled Populations

A large percentage of Racine’s minority and disabled populations are concentrated within the City. This concentration/segregation results in adverse effects such as lower incomes, higher housing cost burdens, and high unemployment rates. Racine shows no jobs/housing imbalance for Racine’s minority or disabled populations.

Employment-Housing-Transit Connections

Improving links between affordable housing and jobs is essential for households without an available vehicle. 9% of the Region did not have access to a vehicle and 12% of Racine residents did not have access to a vehicle according to the 2005-2009 ACS. The extent to which public transit is available, fast, convenient, and affordable determines the accessibility of jobs, healthcare, shopping, and education. In addition, transportation choice enhances quality of life and the local economy.

Racine is primarily served by BUS (a local transit service) and Wisconsin Coach Lines, a rapid express fixed route between Racine, Kenosha, and Milwaukee. SEWRPC estimates that 71% of employers with 100 employees or more are accessible by public transit in Racine County. This is in comparison with the Region where 41% of these employers are accessible by local or rapid transit service.

Finding

Employment-Housing-Transit Connections

In housing markets like Racine’s where there are a large employment base and large percentage of households with housing problems, such as high housing cost burden, increasing access to good-paying jobs through workforce development, transit as well as affordable housing may be necessary to reduce housing problems.

Combined these are direct impediments to fair housing choice in this area. Access to affordable housing is directly connected to employment opportunity and access.

Housing and Transportation Costs

The standard for affordable housing in this AI matches HUD: housing costs, including utilities, should not exceed 30% of gross household income. This standard does not include transportation costs, which are usually a household’s second largest cost. SEWRPC employed a method of estimating housing and transportation affordability called Housing and Transportation Affordability Index (H+T), developed by The Center for Neighborhood Technology (CNT). The H+T index factors in neighborhood variables such as residential density, block size, transit connectivity, job density, and travel time to work as well as household variables including household income, household size, and commuters per household.

An H+T index was developed for Racine County, one of 337 metropolitan areas in the Nation. H+T sets a transportation affordability standard of 18% area median income for gross income devoted to transportation costs. This sets the affordability standard for housing and transportation to 45% of gross household income. Nationwide, CNT found that 70% of communities are affordable when using the conventional standard for

affordable housing and about 40% of communities are considered affordable using the H+T method. It shows that Racine County fares well in housing affordability against gross household income but is less affordable when adding transportation costs to housing; County residents spend 51% of their gross income on housing plus transportation.

Recommended Housing-Employment-Transit Connections

SEWRPC currently promotes doubling the current availability of public transit in the Region to improve linkages between affordable housing and employment. There are challenges to making this a reality such as declining State funding for public transit services. Between 2000 and 2010 there was a 21% reduction in public transit service in the Region. Local funding for public transit is also hampered by its reliance on property taxes. Most public transit systems around the country have a dedicated local funding source, typically a sales tax of 0.25 to 1.0 percent, to fund public transit. Wisconsin currently only relies on property taxes and does not have a dedicated transportation sales tax. Creating a local sales-tax based transportation fund is a difficult proposition as this sales tax would need to be authorized by the State of Wisconsin legislature.

Increasing public transit would benefit minority and disabled populations whose access to employment opportunities are limited by lack of access to a vehicle. Increased employment opportunities resulting from better public transportation could increase household income and therefore increase fair housing choice.

Affordable Housing and Economic Development

Linkages between housing, employment, and transit are shared by the housing industry, employers, and workers. A study by the Harvard University Joint Center for Housing Studies, *Strengthening our Workforce and Communities through Housing Solutions*, notes these concerns can be attributed to two types of communities. The first are communities that have attracted jobs, but may have regulatory barriers to housing. The second type are communities that have experienced economic challenges and a stagnant or decreased share of jobs or population. The City of Racine would fit the second type of community with its high levels of unemployment, low median earnings, low household incomes, and high housing cost burden.

A survey by the Urban Land Institute specifically identifies the concerns employers and commuters have regarding the costs of housing and time spent travelling to work. The survey found that workers' quality of life was impacted where there were long distances between housing and jobs. There is a need for more affordable housing for low- to moderate-income workers located near workers' places of employment. The survey found many employers reported a lack of affordable housing nearby which had a negative effect on their hiring efforts. The survey also found that companies believed long commute patterns affected employee stress, absenteeism, and turnover. Commuters surveyed said if affordable housing options were located closer to their places of employment they would consider moving and some would be likely to make a lateral employment move for a shorter commute time. These results were replicated in Waukesha County by a local survey of businesses.

Affordability and Household Incomes

Racine County has a large employment base and large percentage of households with housing problems like a high housing cost burden. Milwaukee County, located north of Racine County, shares many of these challenges. A study by the Public Policy Forum entitled, *Give Me Shelter: Responding to Milwaukee County's Affordable Housing Challenges*, notes that a housing affordability crisis in Milwaukee County is driven by low household incomes rather than high rents. Adjusted income in Milwaukee County has declined 15.6% while Racine's has declined 9.7% between 1979 and the 2005-2009 ACS. The Regional Housing Plan suggests that an affordable housing strategy in Milwaukee, Racine and Kenosha should include economic and workforce development efforts to effectively address affordable housing needs.

Workforce development could focus on educational attainment, which a local employer survey found to be of very high importance to employers.^{xxxv} The education level of Racine residents is lower than the remainder of the Region, particularly for men 18- to 34 years old. Educational attainment is one indicator of the types of occupations available to a community's workforce, which, in turn affects earning potential and housing affordability. The Regional Housing Plan states that, "Gains in resident workforce educational attainment may help to increase the number of residents hired by existing employers and may help to retain existing employers and attract new employers to the region."

While economic and workforce development efforts are necessary, new units of affordable housing may be needed to replace aging housing stock. Racine, as noted in a previous section, has a significant portion of its housing that was built prior to 1940 with the average of residential structures being 1934. Replacing aging housing with new housing could help retain employers in conjunction with workforce development and create better-paying jobs.

VII. Fair Housing Profile

This section provides a brief overview of current fair housing programs and activities, including public programs administered by the City of Racine and efforts of private entities that affect fair housing choice.

Table 26: Public and Private Groups and their Role in Housing

	Development	Sale	Rental Management/ Assistance	Preservation/ Rehab	Education and Advocacy	Fair Housing Enforcement
FEDERAL						
HUD		✓	✓	✓		✓
FHA		✓				
FSA/RD		✓	✓	✓		✓
VA		✓				
Fannie Mae		✓				
Freddie Mac		✓				
Health and Human Services			✓			
Internal Revenue Service	✓	✓	✓			
STATE						
DOA	✓	✓				
WHEDA	✓	✓				
ERD						✓
MUNICIPAL/COUNTY						
Racine County Equal Opportunity Comm.						✓
Racine City Development Department	✓			✓		
Racine Fair Housing Division					✓	✓
Racine Housing Department	✓	✓	✓			
Racine Health Department					✓	
Racine Police Department					✓	
Racine Affirmative Action Human Rights Comm.						✓
Racine RDA	✓	✓				
STATEWIDE GROUPS						
Wisconsin Partnership for Housing Development	✓	✓	✓			
LOCAL GROUPS						
Metropolitan Milwaukee Fair Housing Council						✓
HALO, Inc.		✓	✓		✓	
Love & Charity Mission					✓	
SAFE Haven of Racine, Inc.			✓			
Women's Resource Center			✓			
Bethany Apartments			✓			
Housing Authority of Racine County	✓	✓	✓			
Racine/Kenosha Community Action Agency			✓		✓	
Housing Resources, Inc.					✓	
Center for Veteran's Issues					✓	
Legal Action of Wisconsin					✓	
Continuum of Care for Racine and Racine Co.			✓		✓	
Racine Vocational Ministries					✓	
Society's Assets				✓	✓	
Racine Neighborhood Watch Group Workcamp				✓		
Meridian Group, Inc.			✓			
Lincoln Lutheran of Racine, Inc.			✓			
Reilly-Joseph Company			✓			
Rosenthal Associates, Inc.			✓			
Millennium Professional Management, LLC			✓			
The Salvation Army			✓			
Goodwill Industries	✓		✓	✓		
ResCare			✓			
St Vincent de Paul			✓			

Inventory of Programs and Organizations Related to Housing

The City of Racine administers several funding sources for the benefit of fair housing. Priorities for these funds are outlined in the Consolidated Plan that is submitted to HUD on a five-year basis and in the Action Plans that are submitted on an annual basis to HUD. The 2015 to 2019 Consolidated Plan outlines the goals, objectives, outcomes, and estimated funding for approximately \$12 million dollars the City of Racine anticipates receiving.

Emergency Shelter Programs

HUD defines emergency shelter as any facility with overnight sleeping accommodations with the primary purpose of providing temporary or transitional shelter for the homeless. The length of stay generally ranges from one night to 60 days. In the City of Racine, there are four emergency shelters, most of which serve specific populations. Additionally, the American Red Cross provides emergency housing services as part of its disaster relief program and there are organizations that provide emergency rental assistance to prevent homelessness including the Racine/Kenosha Community Action Agency and Racine County Workforce Development. The four emergency shelter operations are described below.

- *Homeless Assistance Leadership Organization (HALO, Inc):* <http://www.haloinc.org>
Incorporated in 2005, HALO is a non-profit organization that provides emergency shelter in the City of Racine for men, women and children with a capacity to serve about 120 individuals (plus 30-person temporary overflow) each night. It also coordinates supportive services to promote self-sufficiency in adults, offers homeless children support through stable living and learning environments, and provides community leadership to prevent chronic homelessness. Some of HALO's support services include financial counseling, job and vocational training, alcohol or other drug abuse (AODA) counseling, mental health counseling, life skills training, transitional housing services, and children's advocacy.
- *Love & Charity Mission*
The Love & Charity Mission provides emergency shelter in the City of Racine for homeless persons aged 18 years and older, with a capacity for 22 individuals. The Mission also offers services through its food bank, clothes bank, and meal program.
- *SAFE Haven of Racine, Inc:* <http://www.safehavenofracine.org>
The SAFE Haven of Racine Youth Shelter program provides food, clothing, shelter, mediation, and case management services to runaway and homeless youth between the ages of 10 and 17, with a capacity for eight individuals. Youth may stay for up to two weeks if they attend school and comply with basic shelter rules. The shelter, located in the City of Racine, is open 24 hours a day, and all services are free and confidential.
- *Women's Resource Center:* <http://www.wrcracine.com>
Women's Resource Center provides emergency shelter and transitional housing in the City of Racine for female and child survivors of domestic violence and/or sexual assault, as well as a broad range of counseling, supportive and advocacy services for women and children. The capacity of the emergency shelter is for 31 individuals.

Transitional Housing Programs

HUD defines transitional housing programs as programs that are designed to provide housing and appropriate support services to homeless persons that will facilitate movement to independent living within 24 months. As part of the Continuum of Care (CoC) to move individuals from homelessness to permanent housing, the emergency shelters in the City of Racine either operate transitional housing programs or collaborate with transitional housing programs. Transitional housing opportunities in the City of Racine are described below.

- *Bethany Apartments (Catherine Marian Housing):* <http://bethanyapartments.org>
Located in a 12-unit apartment building in downtown Racine, Bethany Apartments provides transitional housing and supportive services to women and children who are survivors of domestic abuse. Bethany Apartments operates eight units with a total of 34 beds. The organization's main goals are to provide safe, decent, affordable housing to women and children who have suffered abuse, to enhance this assistance with supportive services that will enable the participants to regain their self-esteem and develop the skills needed to live independent lives, and to empower the women and children to become role models of non-violence in their relationships and families.
- *Homeless Assistance Leadership Organization (HALO):* <http://www.haloinc.org>
HALO provides transitional housing in the City of Racine for men, women and children. HALO operates 17 units, with a total of 40 beds, at various sites throughout the City of Racine. Transitional housing also receive supportive services to promote self-sufficiency, including financial counseling, job and vocational training, AODA counseling, mental health counseling, life skills training, and children's advocacy.
- *SAFE Haven:* <http://www.safehavenofracine.org>
The SAFE Passage Transitional Living Program is a community-based program for homeless youth, ages 18 to 21, who are in need of housing, and educational, emotional, and fiscal support. Within the City of Racine SAFE Passage provides: housing (with a capacity for eight individuals), food and clothing, confidential case management and aftercare services, and instruction in independent living skills.

Permanent Supportive Housing Programs

HUD defines permanent supportive housing as permanent housing for homeless persons with disabilities. Basically, it is long-term community-based housing and supportive services for homeless persons with disabilities. The intent of this type of housing is to enable the special needs population to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or coordinated by the applicant and provided by other public or private service agencies.

The City of Racine does not currently have Permanent Supportive Housing but may have this program/ supportive facilities in the future.

Permanent Housing Programs

Permanent housing is intended to be a long-term housing solution. There are many for-profit programs that assist renters facilitate access to homeownership. A nonprofit organization within the City of Racine is listed below:

- *Housing Resources, Inc.:* <http://www.hri-wi.org>
Housing Resources, Inc. provides homeownership education and counseling within Southeastern Wisconsin including the City of Racine. Counseling topics include: homebuyer grant assistance, financial fitness, and reverse mortgage counseling.

Government-Assisted Programs

Government-assisted housing programs are based on income eligibility requirements and provide all or a portion of an individual's rent. The subsidy may be a voucher, which allows an individual to choose any rental unit provided that it meets health and safety criteria set forth by the subsidizing agency. A subsidy could also fund a particular unit or complex of rental housing that is subsidized.

- *Housing Authority of Racine County (HARC):* <http://www.harc.org/index.cfm>
The Housing Authority of Racine County (HARC) works to ensure that quality affordable housing is available for low- to moderate-income families in Racine County, primarily through vouchers for rental properties and through the promotion of programs for home ownership, self-sufficiency and urban stability. HARC administers four main programs applicable to the City of Racine:
 - Housing Choice Voucher (HCV, better known as Section 8) – Under this HUD-funded program administered by HARC, families generally pay the greater of 10% of gross monthly income or 30 percent of their adjusted monthly income toward the cost of the rent of the unit, with HARC paying the difference between the tenant's portion and the contracted rent. HARC serves extremely low- and very low-income families in this program. Families are selected from the waiting list by the date and time of their application. As of 2014, HARC had approximately 1,300 vouchers available for Racine County residents.
 - Family Self-Sufficiency (FSS) – FSS is a program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency. HARC works with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.
 - Homeownership – This program is designed for HCV participants who wish to purchase their first home but need help meeting the monthly mortgage and other homeownership expenses. Eligibility requirements include sustainable employment, income qualified, and homeownership counseling.
 - Handicapped Housing – HARC owns and operates eight units that are for the sole use of handicapped residents. These units are in two four-unit apartment buildings located in the City of Racine.

Housing Program Funds/ Administration

- *City of Racine:* <http://www.cityofracine.org>

The City of Racine Consolidated Plan addresses housing and community development issues. The plan, and its implementation, is led by the City Development Department and involves numerous non-profit organizations, faith-based organizations, and the for-profit and business sectors, as well as other City departments.

- *Department of City Development*

The Department of City Development administers a multi-faceted housing and community development program that addresses the needs of its low- and moderate-income population, and eliminates blight in the City. As an entitlement community, the City of Racine receives direct funding from the Federal Department of Housing and Urban Development (HUD) for the following three programs:

- *Community Development Block Grant (CDBG)*

HUD provides community development block grants to entitled counties, entitlement communities and states (for distribution to non-entitlement communities) for housing programs that principally benefit low- and moderate-income households and other community development purposes. Participating communities and counties develop their own specific programs and funding priorities under the CDBG program. Maximum priority must be given to activities which either benefit low- and moderate-income persons or aid in the prevention or elimination of blight or slums. The City of Racine is designated an entitlement community and currently receives and administers CDBG funding directly from HUD.

- *HOME Investment Partnership (HOME)*

HOME is the largest Federal block grant to State, participating local governments, and HOME consortiums designed to create affordable housing for low- and very low-income households. Each year, HUD distributes about \$2 billion in HOME funding to State and local governments and HOME consortiums based on formula grants to fund a wide range of activities including building, buying, and rehabilitating affordable housing for rent or homeownership, and for the direct provision of rental assistance to low-income households. The City of Racine is designated as an entitlement community for the HOME program and currently receives and administers HOME funding directly from HUD. The HOME program allows the City of Racine to use HOME funds for grants, direct loans, loan guarantees or other forms of credit assistance, or rental assistance or security deposits for eligible households. Eligible activities include the provision of funds to qualifying homeowners and new homebuyers for home purchasing or rehabilitation finance assistance, financial assistance to build or rehabilitate housing for rent or ownership, site acquisition or improvement, demolition costs to make way for HOME-assisted development, and payment of relocation expenses. HOME funds may also be used to provide tenant-based rental assistance. In rental projects with five or more assisted units, at least 20% of the units must be occupied by households with incomes that do not exceed 50% of the HUD-adjusted median income. The incomes of households receiving HUD assistance must not exceed 80% of the area median income. The HOME program requires that each participating local government match 25 cents of every dollar in program funds to support affordable housing.

- *Emergency Shelter Grant (ESG)*
HUD's Emergency Shelter Grant (ESG) assists in providing shelter and transitional housing, homeless prevention programs, and essential social services to homeless people and families. ESG funding can be used to increase the capacity of existing shelters and transitional housing programs, to modify existing shelters and transitional housing in order to improve accessibility, and to develop additional shelter and transitional housing in areas where shelters do not exist. The City of Racine is designated as an entitlement community for the ESG program and currently receives and administers ESG funding directly from HUD.
- *City Housing Department*
The City of Racine Housing Department administers several loan programs to assist in housing rehabilitation efforts:
 - *Homeowner Deferred Rehabilitation Loan Program:* This program is a fixed rate homeowner low-interest loan program, with interest and principal repayments deferred until the property is sold or transferred. Loans are limited to single- and two-family residential structures. Priority consideration is given to the rehabilitation of properties most in need of repair and whose rehabilitation will yield significant benefit to the neighborhood. Loan funds may be used for the correction of major housing and building code violations, weatherization, exterior rehabilitation and selected interior repairs. The loan carries a 3% interest rate for a term up to 20 years. All loans are secured by a mortgage on the property.
 - *Homeowner Fixed Interest Rehabilitation Loan Program:* This program provides for a fixed interest rehabilitation loan, with the interest rate based upon the income of the homeowner. Priority consideration is given to rehabilitation projects that will yield a significant benefit to the neighborhood. The interest rate on the loan is 1-3% depending on the income of the applicant. Only homeowners with low- or moderate-incomes, as defined by HUD, are eligible to participate. The loan proceeds may be used for the correction of major housing and building code violations, weatherization, exterior repairs and selected interior repairs. The loan term can be for up to 20 years. Monthly repayment of the principal and interest is required. All loans are secured with a mortgage on the property.
 - *Rental Assistance Rehabilitation Program:* This program provides loan funds for the rehabilitation of non-owner occupied residential property occupied by low- and moderate-income tenants. Loans may be available for up to 75% of the cost of the rehabilitation project. The loan rate is 5% with a term of up to 20 years. Loan funds may be used for the correction of major housing and building code violations, weatherization, exterior repairs and limited interior repairs. All loans are secured with a mortgage on the property. Eligibility for the program is based upon the income of the tenants.
 - *Mixed Use Rehabilitation Loans:* This program provides loan funds for the rehabilitation of residential units contained in mixed use structures. Loan funds may be used only for interior rehabilitation work of the residential portion of the building. Loan amounts may be up to \$8,000 per dwelling unit, with a maximum of two units assisted in any one structure. The interest rate is 5% with a term of up to 20 years. All loans are secured with a mortgage on the property.

- *City Fair Housing Division*

Federal and State laws make housing discrimination illegal against any individual in a protected class (protected classes include: race, color, sex, national origin/ancestry, religion, age, disability/handicap, marital status, lawful source of income, sexual orientation, and family status). These laws also address a wide range of unlawful housing acts ranging from refusing to rent, sell, insure, construct, or finance housing to printing, publishing, or displaying advertisements or notices that indicate a preference affecting a protected class. The City of Racine Fair Housing Division provides fair housing (antidiscrimination) investigative and enforcement services, conducts educational seminars for housing consumers and members of the housing industry, and provides legal referrals.

The City of Racine Fair Housing Division receives financing from the City through the CDBG program. Federal funding of the CDBG program has declined in the past decade, particularly for administration, and has not met inflation or increasing community funding need after the economic recession. Overall CDBG funding cuts have resulted in reduced funds to devote to Fair Housing within the City of Racine.

- *City Health Department*

Lead poisoning in children can reduce IQ, cause learning disabilities, and impair hearing. At higher exposures, lead can damage a child's kidneys and central nervous system, and cause anemia, coma, convulsions, and even death. Homes built before 1950 have a high likelihood of having lead-based paint or varnish on interior and exterior surfaces. Around 1950, voluntary paint industry standards began to limit lead content in paint though lead was still legally allowed to be used in homes. Homes built between 1950 and 1978 could contain lead-based paint or varnish on interior and exterior surfaces. The use of lead-based paint and varnish in homes was banned by the Federal government in 1978, so homes built after 1978 have a very low likelihood of having lead-based paint or varnish. The median year built for homes in the City of Racine is 1934 and almost 90% of housing structures were built before 1979. The number of houses that potentially contain lead paint means lead poisoning, particularly for children, is a concern in the City. The City of Racine Health Department is a partner in the Kenosha/Racine Lead-Free Communities Partnership Program, which aims to provide lead education, home lead abatement services, and lead-safe contractor training. The home lead abatement program assists families and individuals that meet income requirements, with priority going to households with children under the age of six, pregnant women, and residential-based daycare facilities. The program includes a risk assessment to identify lead hazards and lead removal needs.

- *City of Racine Police Department*

The City of Racine Police Department has partnered with the Siena Center of Racine to offer a conflict resolution service. Counselors help resolve minor civil disputes such as landlord-tenant disagreements or other personal conflicts. It intended to keep officers available for more serious calls and is funded by money seized during criminal investigations.

Other Non-Profit Housing Developers

- *Racine Habitat for Humanity:* <http://www.habitatracine.org>
Habitat for Humanity (HFH) builds and renovates homes with the help of future homeowners through donations of money, materials, and volunteer labor, and then sells the homes to the partner families at no profit. Located in the City of Racine, the Racine Chapter of HFH collaborates with the City, Racine County and the Housing Authority of Racine County to construct and rehabilitate housing units, most of which are located in low-income, high-minority areas of the City.

Supportive Services

Supportive service organizations provide services to individuals to enhance their ability to become self-sufficient or to prevent homelessness. The organizations below are part of the collaborative effort in Racine County, Continuum of Care (CoC), which strives to prevent homelessness and help individuals to maintain and secure permanent affordable housing.

- *Continuum of Care for Racine and Racine County (CoC)*
The CoC out of the efforts of The Homeless Assistance Coalition of Racine formed in 1996 as a collaborative community-based effort to coordinate services, share information, increase funding, and eliminate duplication and gaps in services for homeless individuals and families. The coalition consists of over 30 agencies and organizations, and members meet every month to discuss programmatic and administrative issues and to decide upon coordinating strategies. CoC goals are focused in the areas of: prevention, community needs assessment, coordination of resources, emergency shelter, transitional housing, permanent housing, support services, and outreach, intake and assessment.
- *Racine/Kenosha Community Action Agency:* <http://www.rkcaa.org>
The Racine/Kenosha Community Action Agency (RKCAA) is a HUD-certified counseling agency that provides a range of housing assistance services to homeless persons or those at risk of becoming homeless in Racine County. Some of RKCAA's housing-related services include providing households with rent, escrow or mortgage assistance, energy assistance, weatherization, lead removal, and advocacy to connect people to housing resources, health care providers and public benefit programs. In addition, the organization provides hands-on assistance in searching for housing, negotiating with landlords or mortgage companies, and arranging for additional support based on a case-by-case assessment.
- *Housing Resources, Inc. (HRI):* <http://www.hri-wi.org/index.html>
Housing Resources, Inc. provides home buyer counseling to persons purchasing homes, as well as home owner counseling to sustain homeownership.
- *Center for Veterans Issues (CVI):* <http://www.cvivet.org/housing.htm>
CVI offers programs and services to veterans, including day services; education, training and employment services; drug and alcohol counseling; mental health services; food and nutritional programs; outreach to the community; motivational and self-esteem groups; money management and budgeting; and permanent housing referrals. Services provided by CVI are available to both male and female veterans.

- *HOPE Center:* <http://www.racinedominicans.org/HOPESCenter.cfm>
HOPES Center is an organization designed to promote awareness and offer solutions to the causes and consequences of poverty, mental illness and social injustice. HOPES offers counseling, case management and healing arts services to Racine's homeless and mentally ill free of charge. As a recently state certified Outpatient Mental Health facility, they will now be able to offer services to the underinsured and those on Medicare or Medicaid.
- *Legal Action of Wisconsin:* <http://www.legalaction.org>
Legal Action of Wisconsin, Inc. works to prevent homelessness and to preserve and expand the availability of affordable housing through legal advocacy and by building community collaborations. Legal Action considers cases for representation that impact the ability to secure and maintain safe and affordable housing, such as eviction defense, foreclosure defense, administrative hearings relating to public and subsidized housing, housing conditions and habitability, and access to affordable housing.
- *Racine Vocational Ministry (RVM):* www.rvmracine.org
Racine Vocational Ministry is a faith-based social service agency. One of its programs assists homeless persons to develop employment skills and access employment.
- *Society's Assets, Inc.:* <http://societysassets.org>
Society's Assets, Inc. is an Independent Living Center, providing comprehensive services to assist seniors and people of all ages with disabilities to live independently. Some of these services include: information and referral, advocacy, peer support, independent living skills, nursing home transition, case management, representative payee, personal care, home care, adaptive equipment demonstration and try-out, and disability resources. Also, provided are home modifications assessments; personal safety assessments; and project consultation for accessibility, funding resources, and loan programs.
- *Tomorrow's Home Foundation:* <http://www.tomorrowshomefoundation.org>
A non-profit organization started by the Wisconsin Manufactured Housing Association in 2000, Tomorrow's Home Foundation created a method and mode for disposing of old, uninhabitable mobile homes that were blighting the countryside. It also assists disabled persons in the purchase of a manufactured or modular home via a down-payment assistance grant, and provides emergency assistance grants designed to provide critical repairs so that individuals and families can stay in their manufactured or mobile home. The grant program, called the Helping Hand Assistance Program, is a forgivable loan program designed to assist low-income homeowners that need critical mobile home repairs. Critical home repairs are defined as those that are essential to remain in the home, and do not include items deemed to be cosmetic in nature. In order to be eligible, the homeowner must have owned the home for more than 12 months, and the household income must be at or below 50 percent of the County median income. The maximum funding is \$1,500, and the applicant must provide at least 10 percent of the project cost.

- *Wisconsin Home Energy Assistance Program:* <http://www.homeenergyplus.wi.gov>
The Wisconsin Energy Services Bureau oversees Wisconsin's Home Energy Assistance Program. This includes the federally-funded Low Income Home Energy Assistance Program (LIHEAP), the Wisconsin Weatherization Assistance Program (WisWAP), Lead Hazard Reduction Program, and other related programs. Households with income at or below 150 percent of the Federal poverty level may be eligible for assistance. Many households with income from farms, offices, factories, and other work places receive LIHEAP assistance. In the City of Racine, the Racine/Kenosha Community Action Agency administers these energy assistance programs.
- *Wisconsin Historic Home Owner's Tax Credit:* <http://www.wisconsinhistory.org>
A 25 percent Wisconsin investment tax credit is available for people who rehabilitate historic non-income producing, personal residences, and who apply for and receive project approval before beginning physical work in their projects. More information is available from the Wisconsin Historical Society.

Public Policy Impacts on Fair Housing Choice

Government policies have direct effects on housing choice through program funding and administration, publically-owned buildings, and fair housing ordinances. Policies that regulate land use, building codes, member composition of important boards and commissions, and unintentional bias in public processes can indirectly affect fair housing choice.

This section of the AI examines housing-related policies that impact fair housing choice in the City of Racine including the comprehensive plan, municipal zoning code, building code, consolidated plans, etc. to assess potential barriers to fair housing choice in the City of Racine. Plans and policies that included in this study include those from the City of Racine and the Southeast Wisconsin Region. The plans and policies consulted in the development of the *Analysis of Impediments to Fair Housing Choice* were:

- *A Comprehensive Plan for the City of Racine: 2035*
- *City of Racine Municipal Code*, Chapter 114: Zoning
- *City of Racine Municipal Code*, Chapter 18: Buildings and Building Regulations
- *2010-2014 Consolidated Plan and 2015-2019 Consolidated Plan*
- *Continuum of Care 10-Year Plan to End Homelessness*
- *Five-Year Public Housing Authority Plan*
- *City of Racine Analysis of Impediments to Fair Housing Choice, 2006*
- *City of Racine Municipal Code*, Chapter 62: Human Relations

Development Plans and Ordinances

Density and housing stock characteristics are influenced by community plans and land use regulations. The location and density of residential development is established through a community's comprehensive plan and implemented through zoning and land division ordinances. Ordinances control housing structure types, housing unit sizes and lot sizes. Impact fees and development review regulations and fees also affect the cost of new housing.

A Comprehensive Plan for the City of Racine: 2035

In compliance with State comprehensive planning law (Section 66.1001 of Wisconsin State Statutes), the City of Racine entered into a coordinated, multi-jurisdictional comprehensive planning effort with the County of Racine and 17 local units of government within Racine County in 2005. In 2007, the City entered into agreement with SEWRPC to develop a separate local comprehensive plan based on information developed as part of the multi-jurisdictional comprehensive plan for Racine County.

Finding

Public Policy Impact on Fair Housing Choice

The City of Racine comprehensive plans, zoning code and building code does not conflict with the *Regional Housing Plan for Southeastern Wisconsin: 2035* regarding affordable housing.

There are no direct or indirect impediment to fair housing choice in the comprehensive plan, zoning ordinance or building codes for the City of Racine.

The State Statutes identify the following plan elements be included in a comprehensive plan 1) issues and opportunities; 2) housing; 3) transportation; 4) utilities and community facilities 5) agricultural, natural, and cultural resources; 6) economic development; 7) intergovernmental cooperation; 8) land use; and 9) implementation. For the purposes of the development of the *City of Racine Analysis of Impediments to Fair Housing Choice*, land use, housing, economic development and transportation were examined. (Table 27)

The City comprehensive plan examines existing land uses in the City of Racine as well as future development and redevelopment needs of the community to promote public health, safety and general welfare. It reviews residential, commercial, industrial, transportation/communication/utility, government/institution, vacant, mixed use/urban reserve, and recreation land use categories. Racine is nearly fully developed- almost all vacant land has been developed- and there is little potential for expansion of city boundaries. The plan calls for the City to maintain, renew or redevelop older areas of the City and to implement detailed redevelopment plans for neighborhoods and districts within the community. The plan also suggests the City renew and upgrade older portions of the City to preserve the vitality of older neighborhoods and the supply of affordable housing, which in turn promotes fair housing choice.

The portion of the comprehensive plan that addresses Housing was developed with the assistance of a housing working group who reviewed factors that affect the housing market such as demographic and employment trends, economic development, land use, transportation system accessibility, and community facilities. The working group provided guidance on market-rate housing and affordability as well as policies and programs to encourage workforce and special needs housing. Based on the conclusions of the housing working group, the comprehensive plan gives the following housing suggestions: A variety of housing choices should be developed within the City; programs for low-income, disabled, and elderly populations should be emphasized; the City should work to prevent the displacement of vulnerable populations by allowing for development of smaller homes, assisted facilities, accessory dwellings, nursing homes, etc.; and infill development and rehabilitation of the existing housing stock should be promoted.

The Economic Development section of the comprehensive plan advocates sustaining a strong and diverse economy in Racine. Economic development provides employment opportunities and a tax base that supports cost-effective public services and a livable community. The Economic Development section of the plan also contains the recommendations for redevelopment and infill for development, recognition of the important link between transportation and employment, and the suggestion to expanded employment opportunities for low-to-moderate income individuals, all important components in expanding fair housing.

Lastly, the Transportation section of the plan had a goal of promoting a balanced system with a variety of transportation choices. The plan suggests that a local transportation system should provide transportation choices that will efficiently serve existing and planned uses and provide mobility to citizens of all ages, physical abilities and economic status. It should also allow for maximum productivity with participation in work and educational opportunities and enable social business and recreation interaction that is necessary to maintain a high quality of life. All forms of transportation were examined in the comprehensive plan including streets and highways, bicycle facilities, public transit, para-transit service, carpooling facilities, air service, rail, and the marina, harbor and port.

A Comprehensive Plan for the City of Racine: 2035 shows no conflict with the Regional plan *Regional Housing Plan for Southeastern Wisconsin: 2035*. It recognizes that landuse development is not independent of social and economic factors that may create barriers to fair housing choice. The plan promotes a variety of strategies to lift protected classes and increase fair housing choice within the City of Racine. (Table 27)

Table 27: Comprehensive Plan for the City of Racine: 2035

Land Use Element Policies and Programs

- Accommodate future land use development in areas recommended to developed or redeveloped for the specific land use as identified on the land use map.
- Continue to implement and enforce the detailed recommendations and design standards included in the Racine Downtown Plan, Douglas Avenue Redevelopment Plan, Live Towerview Plan, Neighborhood Strategic Plan for Southside Racine, Uptown Improvement Plan and West Racine Neighborhood Revitalization Plan.
- Continue to create and implement detailed neighborhood plans that are consistent with the comprehensive plan.
- Continue to implement and enforce detailed design standards developed for the City's industrial parks, the Regency Mall area, and similar commercial planned developments.

Housing Element Policies and Programs

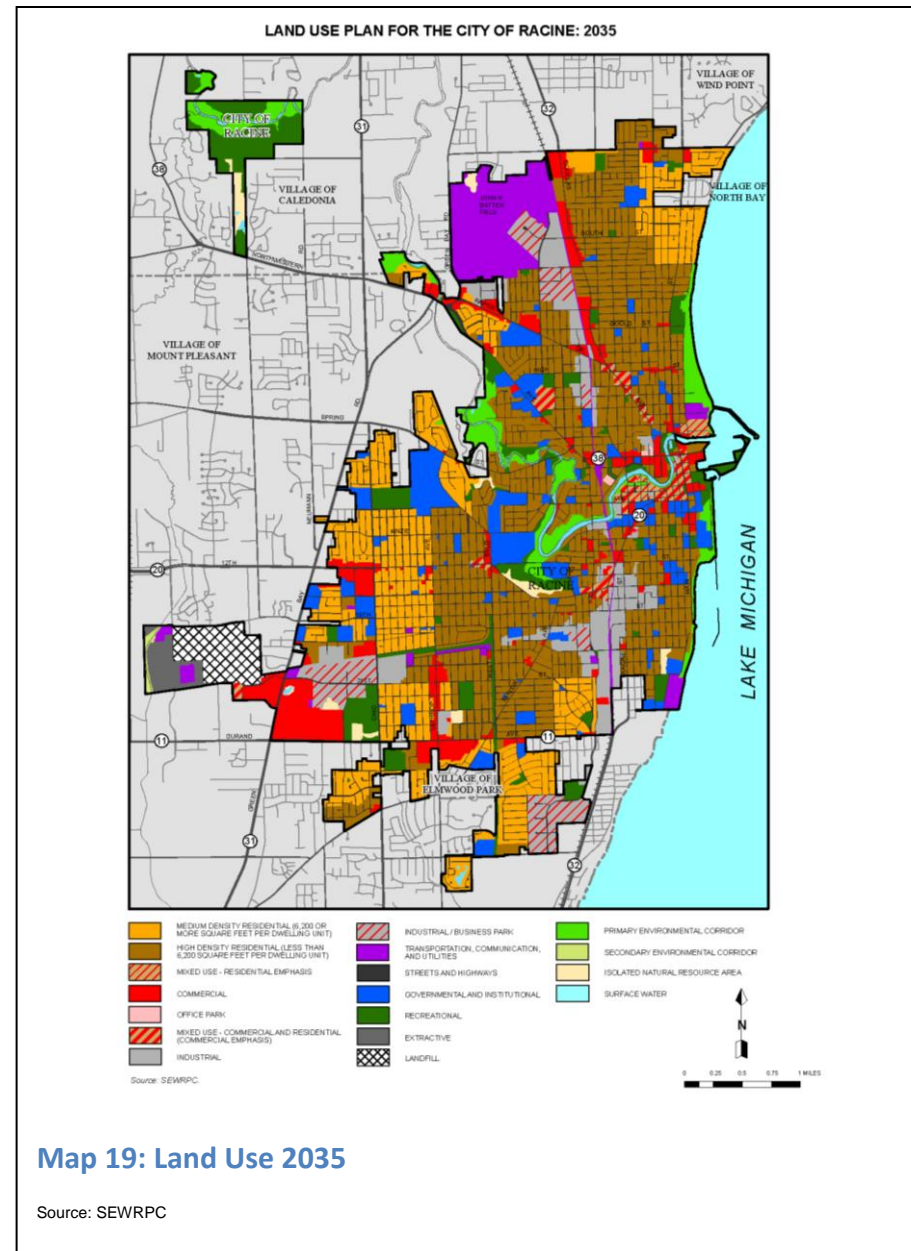
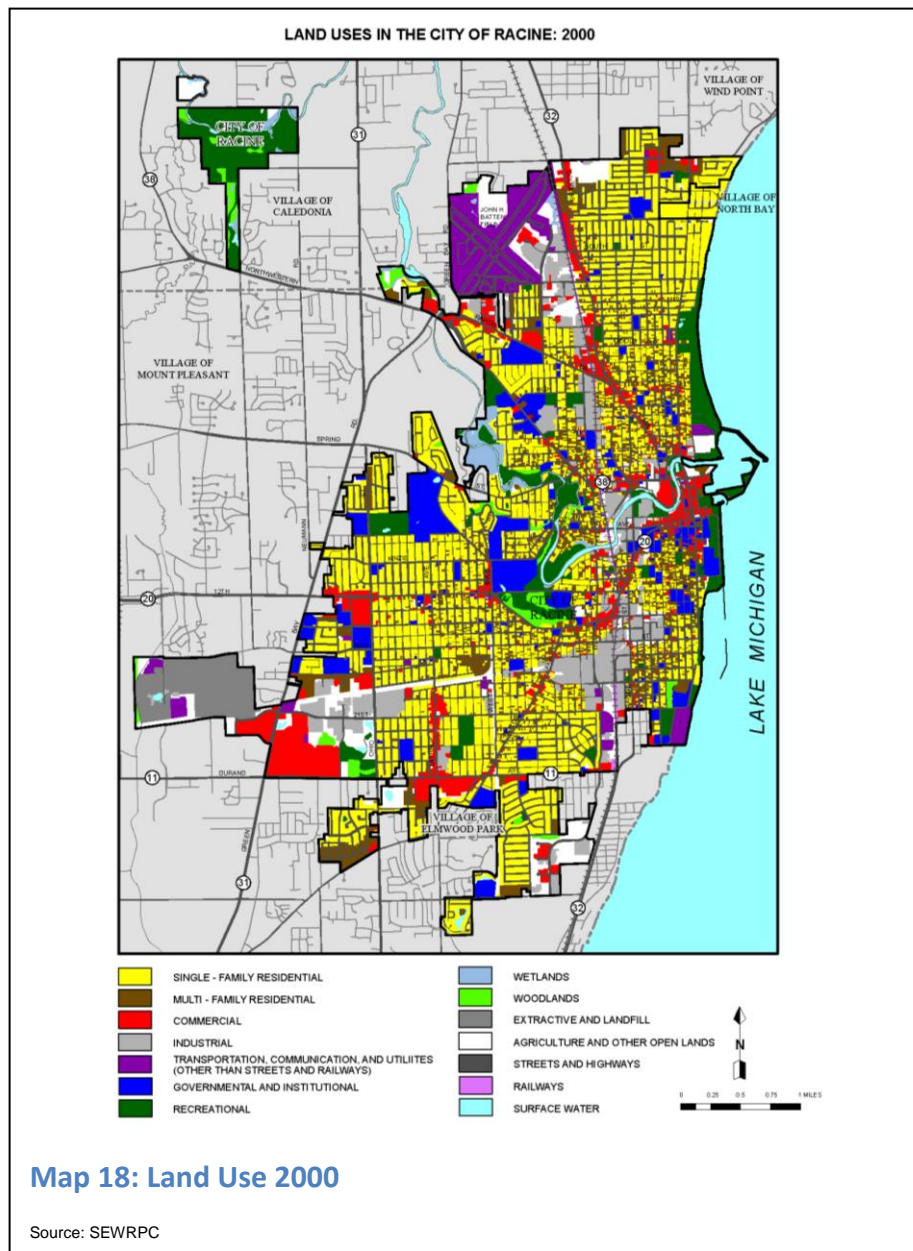
- Support the full range and variety of housing structure types, including single-, two-, and multi-family, accessory, and live/work dwellings, at flexible densities, as appropriate, including mixed-use development patterns.
- Support programs relating to the existing housing stock that enable low-income persons, first-time homebuyers, disabled, and elderly households to maintain, repair, convert, and rehabilitate housing and improve accessibility.
- Enable the elderly and disabled to remain in the City as their needs change by supporting smaller homes, accessory dwellings, nursing homes, community based residential facilities, and other types of assisted living residential arrangements.
- Encourage infill development, rehabilitation, and revitalization practices that benefit existing residents, prevent their displacement, and improve the tax base, availability of jobs, and community facilities.
- Continue the cooperation between the City, nonprofit entities, and the housing development community to utilize available housing funding and assistance programs that facilitate the provision of affordable owner-occupied, rental, and rehabilitated or adaptively reused housing in the City.

Economic Development Policies and Programs

- Continue to implement an aggressive and targeted existing business growth and business attraction program for the City of Racine that is based on: industries with a recent history of competitiveness and export orientation; emerging industries that show a potential for future growth.
- Direct commercial and industrial development to those targeted areas identified for such uses on the comprehensive plan 2035 land use plan map.
- Promote the redevelopment of underutilized, vacant, blighted, brownfield, or other environmentally contaminated industrial and commercial buildings to efficiently utilize existing public utilities and services.
- Advocate for programs that will impact the high unemployment rates in the low-income and minority neighborhoods.
- Promote coordination and cooperation between all of the communities in the County on economic development related issues including business creation, retention, and expansion.

Transportation Policies and Programs

- Act to consider the recommended expansion, improvement, and maintenance of the arterial street and highway facilities designated in the plan for the City, including undertaking, as may be appropriate, detailed planning, preliminary engineering, environmental studies, and official mapping efforts.
- Provide public transit services in accordance with the recommendations set forth in the transit element of the plan.
- Where feasible, consider the accommodation for safe bicycle travel on the arterial street and highway system as that system is resurfaced and restructured on a segment-by-segment basis.
- Provide a system of off-street bicycle paths located primarily within natural resource and utility corridors to provide reasonably direct connections between City of Racine neighborhoods and other urban areas of Racine County as set forth in the plan.
- Work with the Regional Planning Commission in the major review, reevaluation, and update of the Racine County jurisdictional highway system plan.
- Work cooperatively with the Wisconsin Department of Transportation to identify State and Federal grants and programs that are available to fund the implementation of the transportation system plan and apply for such funds as appropriate.



Map 18 and Map 19: Land uses in 2000 and the projected land use for 2035.

A zoning ordinance is a public law that regulates the use of property in the public interest. Local zoning ordinances include both general regulations and special-purpose regulations governing floodplain and shoreland areas and other resources of concern. General zoning regulations (specifically residential zoning) are the focus of the AI. The City of Racine has adopted a general zoning ordinance governing the use of land within its corporate area. In addition, the City has adopted a floodplain zoning and shoreland-wetland zoning as required under Wisconsin Statutes. Zoning within the City can be summarized by Map 20. Zoning in 2000 is described below:

- About 6,225 acres of land, or 62.0 percent of the City, were in residential zoning districts
- About 930 acres, or 9.3 percent of the City, were in commercial zoning districts
- About 1,950 acres, or 19.4 percent of the City, were in industrial zoning districts
- About 515 acres, or 5.1 percent of the City, were in governmental and institutional zoning districts
- Floodplain and shoreland-wetland zoning districts were in place on about 340 acres of land, or 3.3 percent of the City
- The balance of the City—about 90 acres—was comprised of surface water not included in a zoning district

Permitted uses, or uses that are allowed without additional regulation or processes, are allowed for a variety of housing types in the City of Racine. The zoning restrictions are not overly restrictive and do not create unaffordable housing. Single-family and multi-family land uses are allowed as permitted use without going through a conditional use process.

Lot size, density, and housing unit size requirements can all impact housing affordability. Lot size can impact the cost of housing because the land cost of a large lot size adds to the cost of residential development. *The Southeastern Wisconsin Regional Housing Plan: 2035* identifies 7,200 square feet or less for single-family and 8,000 square feet or less for two-family development to promote densities that would promote affordable housing. With the exception of the R1 Single-Family Residential Zoning District, lot sizes are generally 6,000 square feet for single-family and two-family developments. (Table 28)

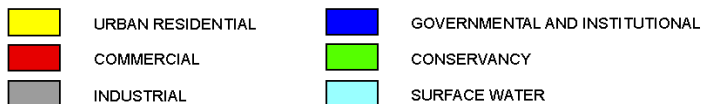
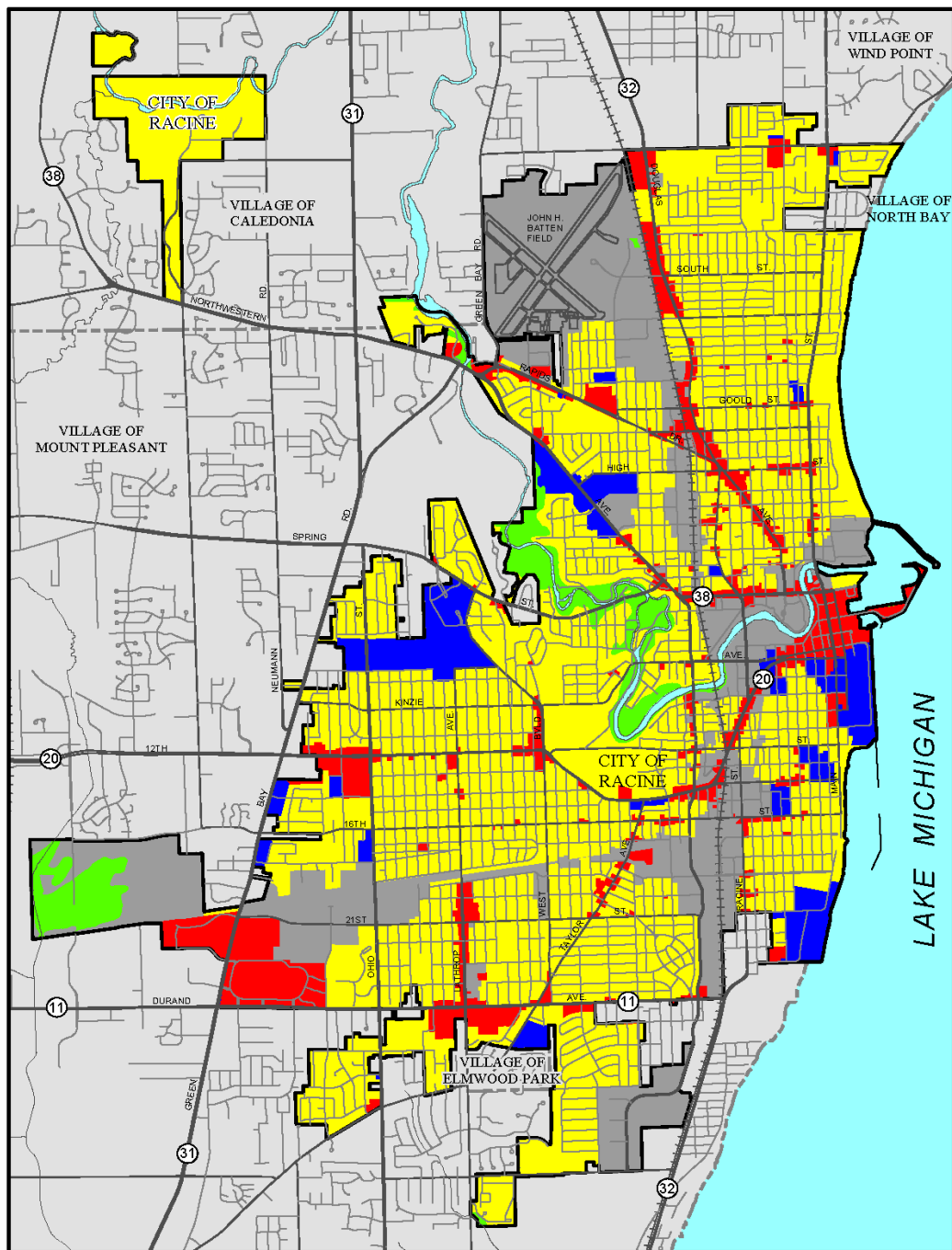
The Regional Housing Plan also recommends that a minimum building floor area of 800 square feet to ensure the provision of decent, safe, and sanitary housing. Most local zoning in the Southeastern Wisconsin Region includes requirements that detail the amount of space that is necessary to avoid these housing problems. The plan finds that the City of Racine does not specify a minimum floor area for single-family housing and is an exception to the regional standard. The City of Racine zoning code does specify minimum unit sizes for multi-family of 420 square feet but this is less than the recommended 800 square feet endorsed in the Southeastern Wisconsin Regional Housing Plan.

The results of the SEWRPC analysis on lot size, density and housing unit size requirements are summarized in Maps 21 and 22. The Regional Housing Plan shows the City of Racine does not restrict the development of affordable housing and affirmatively furthers fair housing choice.

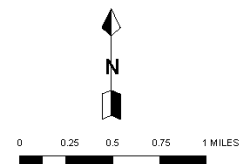
Table 28: City of Racine Zoning Ordinance
Minimum Lot Size and Floor Area Requirements for Residential Zoning Districts

Residential Zoning District	(Permitted) Minimum Lot Size	Minimum Floor Area (sq. ft.)
R1 Single-Family Residential District	8,400 square feet	Not Specified.
R2 Single-Family Residential District	6,000 square feet	Not Specified.
R3 Limited General Residential District	<ul style="list-style-type: none"> • Single-family and community living with 8 or fewer persons: 6,000 square feet • Community living with 9-15 persons: 12,000 square feet • Two-family: 3,000 square feet/du • Efficiency and one bedroom: 2,400 square feet/du • Three bedroom or larger: 2,700 square feet/du 	Not Specified.
R4 General Residential District	<ul style="list-style-type: none"> • Single- and two-family: 6,000 square feet • Single-family and community living with 8 or fewer persons: 6,000 square feet • Community living with 9-15 persons: 12,000 square feet • Efficiency and one bedroom: 1,500 square feet/du • Two-bedroom: 1,800 square feet/du • Three bedroom or larger: 2,100 square feet/du 	Not Specified.
R5 General Residential District	<ul style="list-style-type: none"> • Single- and two-family: 6,000 square feet • Single-family and community living with 8 or fewer persons: 6,000 square feet (Conditional: 800 square feet/bedroom) • Community living with 9-15 persons: 12,000 square feet (Conditional: 800 square feet/bedroom) • Efficiency and one bedroom: 700 square feet/du • Two-bedroom: 850 square feet/du • Three bedroom or larger: 1,000 square feet/du 	Not Specified.
R6 General Residential District	<ul style="list-style-type: none"> • Single-family and community living with 8 or fewer persons: 6,000 square feet (Conditional: 800 square feet/bedroom) • Community living with 9-15 persons: 12,000 square feet (Conditional: 800 square feet/bedroom) • Efficiency and one bedroom: 350 square feet/du • Two-bedroom: 450 square feet/du • Three bedroom or larger: 550 square feet/du • Boarding and fraternity: 325 square feet/unit 	Not Specified.
Flex Development Overlay District	-----	Redevelopment of property suitable for use.

GENERALIZED ZONING IN THE CITY OF RACINE: 2000

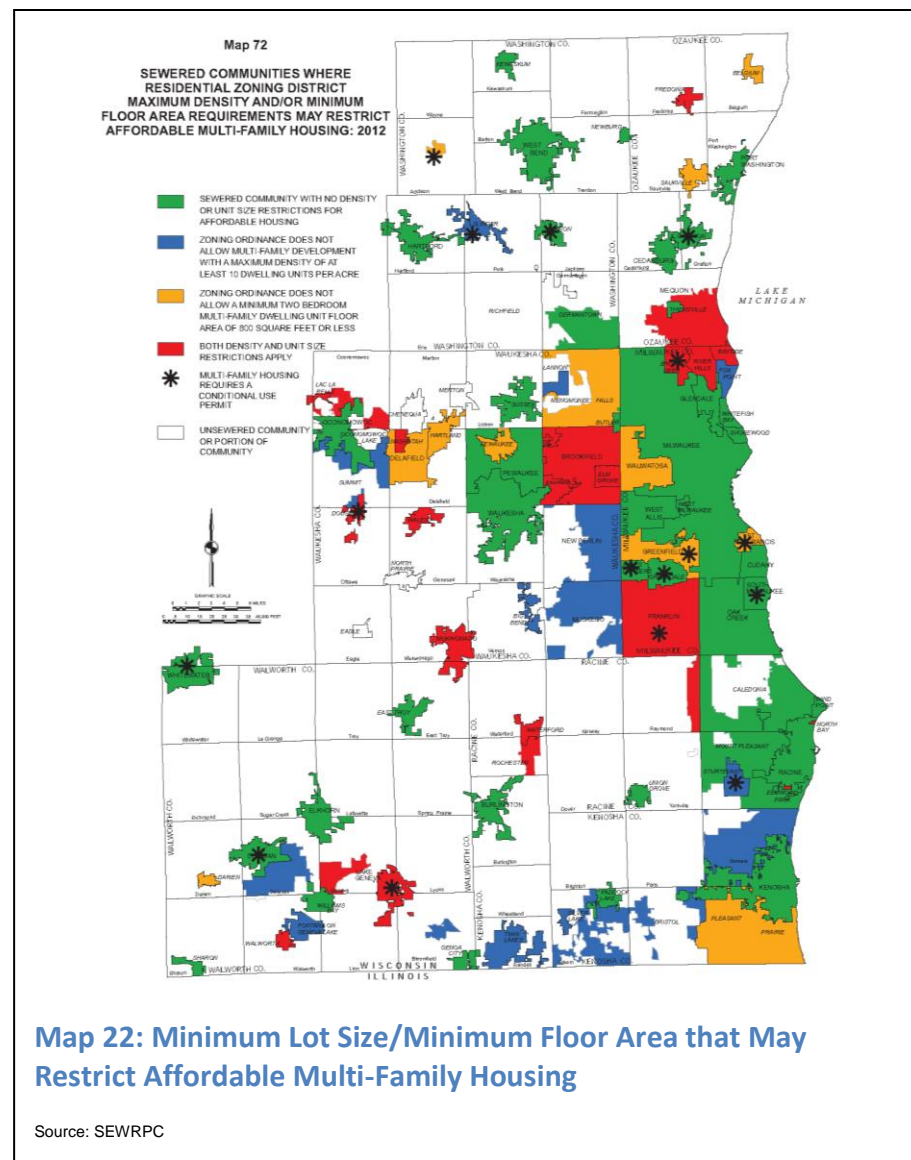
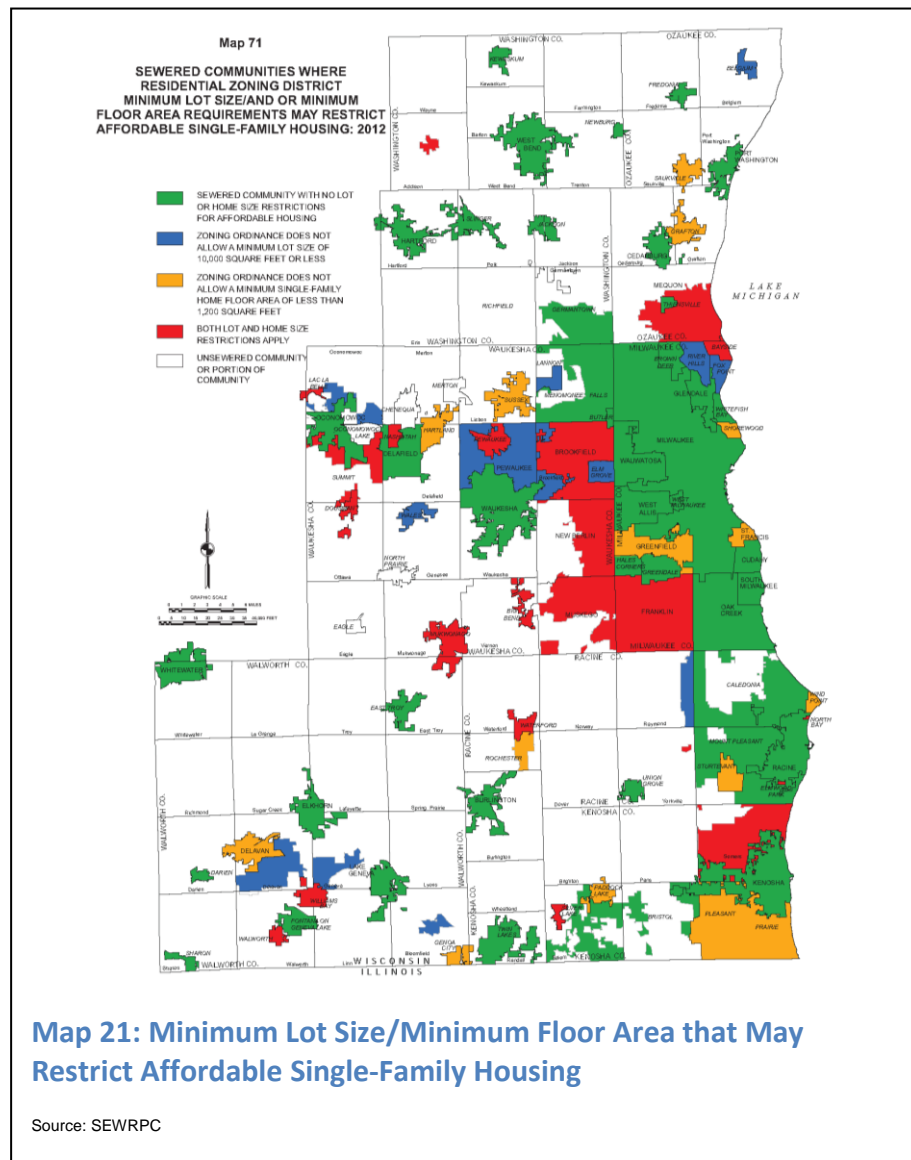


Source: SEWRPC.



Map 20: Zoning 2000

Source: SEWRPC



Maps 21 and 22: The City of Racine restricts single-family or multi-family affordable housing development based on minimum floor area and maximum density zoning requirements.

Building Codes

There are two sets of building codes that are applied to residential construction in the State of Wisconsin. For 1 -4 unit residential structures, the Wisconsin Uniform Dwelling Code (UDC) applies and 4+ unit residential structures are regulated by the Wisconsin Commercial Building Code (WCBC). The State of Wisconsin considers any residential structure over 4 units to be commercial buildings.

The UDC is a statewide regulation that sets standards for fire safety, structural strength, energy conservation, erosion control, heating, plumbing, electrical systems, and general health and safety in dwellings built after 1980. The UDC applies evenly through the state although local governments may adopt a more stringent code. The UDC is enforced the City of Racine Building Department.

For residential structures greater than 4 units, the WCBC establishes standards for the design, construction, maintenance, and inspection of “public” buildings, including multifamily buildings. The code includes minimum standards for erosion control, sediment control and stormwater management, construction of buildings and structures, energy conservation, heating, ventilation, air conditioning, and fuel gas appliances. The International Building Code, International Energy Conservation Code, International Mechanical Code, International Fuel Gas Code and International Existing Building Code are incorporated into the WCBC, subject to specified modifications. Unlike new single- and two-family homes, multifamily buildings are required to provide accommodations for persons with disabilities. Additional accessibility requirements beyond those required by the WCBC are required if a project receives federal funding. The City of Racine Building Department examines building plans and provides inspection services.

As both sets of regulations do not typically vary between local governments, these building codes do not affect fair housing choice.

Federal Funding Plans and Impact on Fair Housing Choice

The City of Racine, Continuum of Care for Racine and Racine County (CoC), and the Housing Authority of Racine County (HARC) must annually certify they are each affirmatively furthering fair housing and must detail what they will accomplish using federal funds. Each group must present these requirements in a formal plan.

Consolidated Plans (Con Plan)

The Consolidated Plan is required for the City of Racine to receive funds from HUD including Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant (ESG) funds. A Con Plan is a document that describes the housing needs of low- to moderate-income residents, impediments to affordable housing choice in the community, needs of the homeless within the community, and non-housing needs of low- to moderate-income residents. (Table 29) The Con Plan outlines strategies to meet housing needs and lists the resources available to implement the strategies. This plan is prepared every five years and is reviewed by HUD for completeness.

The AI looks at the Con Plan in terms of the future projected needs for the 2014-2019 Con Plan. Citizen participation and data reveals that economic and workforce development efforts are needed within the City of Racine. A total of 38% of the CDBG allocation is projected to be spent in the economic/workforce development category. Additionally, both citizen input and independent data sources concur that additional funds should be spent rehabilitating and repairing existing housing stock. The Con Plan also tentatively calls for 28% of CDBG and 90% of the HOME allocation be spent on these activities. The remaining CDBG is projected to be spent on additional public services, neighborhood facility/public facility/infrastructure improvements, and administration. The remaining HOME funds are projected to be spent on program administration. ESG dollars will be spent to mitigate and prevent homelessness.

Continuum of Care 10-Year Plan to End Homelessness

The McKinney-Vento Homeless Assistance Act of 1987 authorized HUD to use ESG funds and other programs to fund transitional and permanent supportive housing. Through 1993, individual agencies applied for HUD homeless assistance funds through national competitions. In 1994, the competition was changed with the intent of stimulating a community-wide planning and coordinated program to assist homeless persons. HUD began requiring communities to coordinate submittal of a consolidated application rather than individual agencies. The new combined funding for homeless assistance through a “Continuum of Care” approach was adopted by the Continuum of Care for the City and County of Racine.

Public Housing Authority 5-Year Plan

The PHA Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations and strategies for meeting local housing needs and goals. There are two parts to the PHA Plan: the 5-Year Plan, which each PHA submits to HUD once every 5th PHA fiscal year, and the Annual Plan. HARC follows HUD requirements for tenant selection criteria. There is no preference stated for tenant selection. Additionally,

Finding

Federal Fund Plans

Plans used by Racine entities (City, HARC, and CoC) affirmatively further fair housing choice by increasing the supply of affordable housing options. Their combined efforts raise the wages of low- to moderate income individuals.

There are no direct or indirect impediments to fair housing choice.

there are no plans to sell subsidized housing and no possible displacement as HARC only operates eight units of project-based disabled housing. (Table 31)

Table 29: Consolidated Planning Strategic Activities: 2014-2019		
Strategy/Activity	Resource/Funding Source	Percent of Allocation Dedicated
Housing <ul style="list-style-type: none"> Rehab/repair existing owner-occupied housing (i.e. code compliance, energy efficiency and accessibility) Develop new owner-occupied housing Rental rehab/repair, develop special needs housing and/or provide self-sufficiency rental assistance Provide seed or operating funds for Community Based Housing Development Organizations 	CDBG/HOME HOME CDBG/HOME HOME	15%/35% 15% 13%/35% 5%
Public Services <ul style="list-style-type: none"> Mitigate or prevent homelessness Provide youth employment opportunities Help increase job skills/employment training Improve neighborhood safety/crime prevention efforts 	ESG CDBG CDBG CDBG	95% 5% 8% 2%
Economic Development <ul style="list-style-type: none"> Assist business to retain or create jobs for LMI individuals Assist microbusiness enterprises 	CDBG CDBG	19% 6%
Public Facility/Infrastructure Improvements <ul style="list-style-type: none"> Improve neighborhood facilities/public service facilities/infrastructure 	CDBG	12%
Planning and Administration	CDBG/HOME/ESG	20%/10%/5%

Table 30: Continuum of Care 10 Year Plan to End Homelessness		
Strategy/Activity	Funding Source	Responsible Parties
Permanent Housing <ul style="list-style-type: none"> Create new permanent housing beds for chronically homeless persons Identify foreclosed properties that have been abandoned that may be suitable for development Increase the percentage of participants remaining in CoC funded permanent housing for at least six months Implement a monthly case management training program Implement the Rent Smart program to inform people of their rights and responsibilities as a renter Increase money management and credit counseling services 	ESG, ETH, HUD and non-profit funds ESG, ETH, HUD and non-profit funds	Racine CoC Racine CoC
Transitional Housing <ul style="list-style-type: none"> Continue to provide intensive support services such as mental health and substance abuse counseling, employment and vocational assistance, access to medical care, and access to legal assistance Increase the number of individuals receiving SSI and SSDI benefits through the Social Security Opportunity Advocacy and Recovery (SOAR) Program 	 ESG, ETH, HUD and non-profit funds	 Racine CoC and DWD
Economic Support and Employment <ul style="list-style-type: none"> Increase participation in literacy and skills enhancement programs and computer skills programs Implement job development networks with local employers Increase emphasis on overcoming barriers to employment 	 ESG, ETH, HUD and non-profit funds	 CoC, City of Racine, and CHDOs
Prevention <ul style="list-style-type: none"> Provide case manager training for identifying at-risk population and issues that may result in eviction Improve access to affordable permanent housing by working CHDOs and the City 		

Table 31: Public Housing Authority 5 Year Plan

Goal #1: Increase the availability of safe, decent affordable housing in Racine County:

- Objective #1: Obtain additional rental vouchers
- Objective #2: Leverage private and public funds to create additional housing opportunities.
- Objective #3: Develop additional housing units.
- Objective #4: Increase housing choices.

Goal #2: Improve the quality of assisted housing;

- Objective #1: Provide quality public housing management.
- Objective #2: Improve voucher management.
- Objective #3: Renovate and modernize public housing.

Goal #3: Improve community quality of life and economic vitality.

- Objective #1: Designate developments and buildings for particular resident groups.
- Objective #2: HUD will recognize the Housing Authority of Racine County as a high performing housing authority through 2009.

Goal #4: Promote self-sufficiency and asset development

- Objective #1: Increase the income in Housing Choice Voucher households
- Objective #2: Offer supportive services for that assist disabled and elderly households with increased self-sufficiency.

Goal #5: Ensure equal opportunity and affirmatively further fair housing.

Fair Housing Laws

National, State, and local fair housing laws exist to protect various classes of people (“protected classes”). Protected classes describe a characteristic of a person, or population, that cannot serve as the basis for discrimination. Originally, four protected classes were included in the Fair Housing Act, or Title VII of the Civil Rights Act of 1968: race, color, religion, and national origin. In 1974, the FHA was amended to include sex/gender and in 1988 to include the protected classes of disability/handicap and familial status. State and local governments may extend the FHA laws to other groups. The State of Wisconsin has adopted expanded protected classes from the federal protected classes.

When Black/African Americans first began to migrate to Racine in 1940s from the South in search of industrial jobs, the only housing available was trailer camps on the north and south ends of the City. A nearly fifteen year struggle ensued where the local chapter of the NAACP and eventually the Hill-Kidd Committee, a committee appointed by the Mayor of Racine in 1966, fought for access to equal housing choice. On February 20, 1968 the first Open Housing Ordinance was passed by the City of Racine Common Council.^{xxxvi}

The original ordinance protected three classes: color, religion and national origin. Since the original passage of the ordinance, the City of Racine has expanded the number of protected classes to thirteen. These protected classes include all of the federal and many of the state protected classes. (Table 32)

The AI is expected to address housing choice for these protected classes. *The City of Racine Municipal Code of Ordinances, Section 62 Human Relations, Article II-B Discrimination* was reviewed in the context of federal and state anti-discrimination protected classes and exemptions. These laws set the precedence for the establishment of a local ordinance that may be more restrictive, but should not be less restrictive than these laws.

Chapter 62: Human Relations, Article II-B Discrimination was reviewed by the Metropolitan Milwaukee Fair Housing Council in 2006 in the *City of Racine Analysis of Impediments to Fair Housing*. It found that the ordinance should be amended to address the following: 1) Clearly define a process for enforcing the law beyond conciliation and education; review the Affirmative Action and Human Rights Commission role in adjudication; and review other alternatives for local enforcement, 2) include specific penalties for violations of the law, 3) Reflect the statute of limitations contained in federal and state laws, 4) Include relief for victims in the form of compensatory and injunctive relief 5) Include a definition of disability, 6) Modified to unambiguously prohibit discrimination in homeowners insurance, construction, and financing of housing, 7) Provide a clear definition for “economic status,” 8) Amend its definition of “familial status,” 9) Provide comprehensive protection from discrimination in all aspects of housing including advertising, 10) Amend the exception for “elderly housing” to reflect state and federal definitions; and, 11) Eliminate barriers for filing complaints and opportunities for the complainant and respondent to have balanced opportunities in the administrative process. Ordinance number 10-08 was adopted on June 1, 2010. It repealed the former Chapter 62, Article II-B and replaced it with a new Article II-B that addresses the findings of the 2006 AI.

Finding

Fair Housing Laws

Chapter 62 Human Relations II-B of the *City of Racine Municipal Code of Ordinances* does not include the protected classes of ancestry or status of domestic abuse, sexual abuse, or stalking. It also does not include an exception to II-B so that housing may be solely dedicated to disabled housing.

This is a direct impediment to fair housing choice in that certain protected classes are not included under local law and that exceptions are made for disabled-only housing.

A review of the current *Chapter 62: Human Relations, Article II-B: Discrimination* shows that City of Racine adopts all seven federally protected classes and many of the State of Wisconsin protected classes. The City of Racine ordinance does not include all State of Wisconsin protected classes. The protected classes that are not protected by municipal ordinance but state statutes are:

- Ancestry
- Status of a victim of domestic abuse, sexual abuse, or stalking

An additional consideration is use of different definitions for common phrases. The City of Racine defines “economic status” as “lawful source of income” in its ordinance. It is recommended that economic status be replaced with lawful source of income to reflect state usage.

There are certain exceptions to the protected classes at federal, state, and local level to allow a benefit to a particular population such as housing that is solely dedicated to elderly and disabled persons. The federal regulations allow for exceptions for owner-occupied buildings with less than four units, housing solely used for the elderly and disabled, and for those persons that have been convicted of the illegal distribution or manufacturing of drugs. Wisconsin state statutes allows for the exception to housing solely used for the elderly and disabled and for housing that has five roommates or less. The City of Racine allows for the exception of housing solely used for the elderly, but not for housing solely used by disabled.

Table 32: Protected Classes			
Protected Class	Federal	Wisconsin	City of Racine
	<i>42 U.S.C. 3602</i>	<i>Wis. Stat. 106.50 (1)</i>	<i>Ch. 62</i>
Race	✓	✓	✓
Color	✓	✓	✓
Religion	✓	✓	✓
Sex/Gender	✓	✓	✓
National Origin	✓	✓	✓
Handicap/Disability	✓	✓	✓
Familial Status	✓	✓	✓
Sexual Orientation		✓	✓
Marital Status		✓	
Ancestry		✓	✓
Public Assistance/Lawful Source of Income/Economic Status		✓	✓
Age		✓	✓
Status of a victim of domestic abuse, sexual abuse, or stalking (limited protections)		✓	
Veteran’s Status			✓
Disabled Veteran’s status			✓
Exceptions	Owner occupied buildings with 4 or fewer units Housing for elderly or persons with disabilities Illegal distribution or manufacture of drugs	Roommates (5 or fewer) Housing for elderly or persons with disabilities	Housing for elderly

Fair Housing Enforcement

An internal review was conducted on the Fair Housing Division (FHD) operations and practices. In the past the Fair Housing Division was a stand-alone department with a large annual operating budget. Due to cuts in the City CDBG allocation, of which FHD is solely funded, staffing and time allocated to fair housing have decreased. Prior to 2010, the city funded the Fair Housing Department at a budget of approximately \$126,000 per year. Beginning in that year, in response to the declining funding available, the city reorganized its Fair Housing program, making it a responsibility of the Department of City Development, instead of a free-standing department. Through this effort, funding was decreased to \$46,000 budgeted for 2015.

Concerted efforts by City staff have been taken to ensure that the quality of those services is at an efficient and optimum level in dealing with fair housing enforcement.

Today the Fair Housing Division consists of one full-time staff person and one part-time staff person who devote only a portion of their time to fair housing activities. FHD advertises through primarily word of mouth advertising, presentations and its website. The community outreach conducted during the development of the Consolidated Plan and the AI found that a majority of citizens, 95 percent, had never contacted the Fair Housing Division. Those surveyed and interviewed indicated there was inadequate training and resources on fair housing laws in the City of Racine.

FHD on average receives 2,000 calls into its Fair Housing Hotline: (262) 636-9595. In general most phone calls are related to tenant-landlord complaints. A small amount of time is used to educate the caller on fair housing discrimination referral to an appropriate resource. The department was criticized in the past for what some considered too much involvement by staff in administering State landlord-tenant law. Staff now makes direct referrals to other agencies that can advise residents on tenant law. This has been a necessity because of budget cuts and the limited time of employees but has also has been to prioritize the time of the FHD in enforcing fair housing law.

The full-time City of Racine staff person is assigned to the Affirmative Action and Human Rights Commission (AAHRC). Reports are generated on a monthly basis outlining the disposition of phone calls received and where calls have been referred. Reports to the AAHRC do not normally include a summary of year to date fair housing discrimination activities. Data in the report to the AAHRC includes a running year to date total protected class bases of complaints and numbers of tests and investigations as well as disposition of the complaint (open, closed). This was also cited in the 2006 AI completed by the Metropolitan Milwaukee Fair Housing Commission.

Another responsibility of FHD is fair housing discrimination testing. Limited discrimination testing has occurred within the last five years. The most recent tests occurred in 2010, 2011, and 2012. Five tests were conducted in each year. Thirteen of the fifteen tests were inconclusive. Of those that were conclusive, both involved familial status discrimination and one involved disability discrimination. The tester pool at this time is relatively small with about a half dozen testers.

Finding

Fair Housing Enforcement

FHD has seen decreasing funding in recent years, which may have affected its visibility in the community. The AAHRC is not fully engaged in the fair housing complaint process. It appears to need additional education and training in fair housing discrimination laws and needs improved communication from staff on fair housing complaints and their disposition.

These are direct impediments to fair housing choice.

The full-time staff member assigned to fair housing also is involved in monitoring CDBG, HOME, and ESG programs funded internally and externally for program compliance. When monitoring for the CDBG, ESG and HOME programs, the City staff person found that the City itself and external agencies had uneven application of usage of the Equal Opportunity Logo and Poster. Once pointed out, the City and external agencies corrected this finding. Partner organization updated letters, brochures, applications, and websites and photos, and documented public display of EHO posters. The City should incorporate fair housing items into its monitoring checklists to ensure that it is affirmatively furthering fair housing.

Affirmative Action and Human Rights Commission (AAHRC)

The AAHRC is, by ordinance, charged with taking fair housing complaints and conducting investigations. The ordinance charges the Commission with providing education on equal rights to members of the public, adoption of regulations and rules, to make recommendations to the Common Council, and to serve as an advisory board to the Mayor and Common Council.

In 2009, the Commission reviewed and updated Section 62 of the City of Racine Municipal Ordinance relating to fair housing. The ordinance was nearly completely overhauled to implement eleven needed and necessary changes to the ordinance. A more thorough explanation of the changes was described in the Fair Housing Law Section.

Since the AI, the AAHRC is still underutilized for receiving and conducting fair housing investigations. No complaints have been reviewed by the AAHRC in the last five years. However, the AAHRC has been more thoroughly trained in fair housing law and is more regularly updated on fair housing complaints and disposition of those complaints than in the past. The AAHRC has also been involved in the development and the eventual endorsement of the *Regional Housing Plan for Southeastern Wisconsin: 2035*.

City of Racine Fair Housing Complaint Process

Fair housing complaints in Racine are handled by the Fair Housing Division located in the City of Racine Department of City Development. Residents can also contact the Metropolitan Milwaukee Fair Housing Council, Wisconsin Equal Rights Division and the HUD Office of Fair Housing itself.

Online information on housing discrimination is provided on the City's website at www.cityofracine.org/FairHousing.aspx. Information on fair housing discrimination and relevant contact information are provided. Google searches for the "Racine fair housing" and "Racine housing" lead a searcher to the page.

Once initiated, the complaint process begins with City staff conducting an interview to determine if the allegation of discrimination violates city, state or federal fair housing law. If there is evidence of a violation staff will have the complainant come in for an intake and interview. City staff writes up the initial complaint and makes a determination on the appropriate action – testing, mediation, education, or filing a complaint with another agency. Depending on the severity of the claim the complaint may be sent through the ERD and/or HUD complaint process with guidance to the complainant from City staff. Should the complaint fit one of the City's protected classes of veteran's status or disabled veteran's status, the complaint would be sent to the Affirmative Action and Human Relations Commission for settlement. Allegation of discrimination must happen within 1 year of the discriminatory action. Punitive damages can be assessed at the local level.

State of Wisconsin and Federal Fair Housing Complaint Process

The State of Wisconsin Equal Rights Division of the Department of Workforce Development accepts complaints from or on behalf of a person alleging discrimination. The process begins with a 4-page complaint form. A hearing is held and the decision can be appealed. To appeal a civil action may be filed in court including damages, punitive damages, court costs and reasonable attorney fees.

HUD housing discrimination complaint process is an eight step process, beginning with filing a short complaint. The complaint is review by a fair housing specialist to determine if the alleged acts violate the FHA. If there is evidence of a violation, the specialist will assist the complainant in filing an official housing discrimination complaint. HUD investigates the complaint at no cost to the complainant with relevant documents, interview, and site visits, as appropriate. If the investigate yields reasonable cause that discrimination occurred, HUD will issue a charge. A HUD Administrative Law Judge (AJL) will hear the case, unless the party elects to have the case heard in federal civil court.

Documented Fair Housing Complaints in Racine

Complaints received by the FHD are tabulated below. As noted above FHD primarily sends cases to HUD or ERD for resolution if the fair housing discrimination is severe enough. Since 2010, twenty-two complaints have been investigated. Presently there are four cases open and under investigation. Seventeen cases were investigated and closed with no penalties assessed. One case was found to have merit: On January 8, 2014, the federal courts entered a consent decree in *United States v. Allegro Apartments*, a case that was referred to the US Department of Justice by HUD and the City of Racine Fair Housing Division. The complaint, which was filed on December 2, 2013, alleged that the owners of a 96-unit residential rental property violated the Fair Housing Act on the basis of disability by refusing to rent an apartment to a woman who used an assistance dog. The consent decree requires the defendants to adopt a new assistance animal policy, attend fair housing training and pay \$8,500 to the HUD complainants.

Protected Class	2010		2011		2013		2014		Total
	Closed	Open	Closed	Open	Closed	Open	Closed	Open	
Race	4				2		1	2	9
Color									0
Religion									0
Sex/Gender					1		1	1	3
National Origin									0
Handicap/Disability			2		2		3	1	9
Familial Status					1				1
Sexual Orientation									0
Marital Status									0
Ancestry									0
Public Assistance/Lawful Source of Income/Economic Status									0
Age									0
Status of a victim of domestic abuse, sexual abuse, or stalking									0
Veteran's Status									0
Disabled Veteran's status									0

VIII. Public Participation

Public participation in the development of this AI included surveys, interviews, a focus group, and a public hearing. The following summarizes the public participation that was sought. Public participation is incorporated into the recommendations of this *Analysis of Impediments to Fair Housing Choice*.

Community-Wide Needs Survey

Two surveys were sent out by the City of Racine to gather input from 1) residents and 2) from non-profit organizations in the City of Racine. Resident input was gathered in the *2014-2019 Consolidated Plan Community-Wide Needs Survey*, which included questions on fair housing discrimination. The Community-Wide Needs Survey was offered in hardcopy and electronic format in both English and Spanish. The survey was advertised and distributed as shown in Table 33.

Table 33: 2014-2019 ConPlan Community-Wide Needs Survey Distribution	
Advertisements	Date of Activity
Racine Journal Times	6/24/2014
Organizations (hard copy)	
Cesar Chaves Community Center	6/27/2014
City Development Department	6/27/2014
Bethany Apartments	6/27/2014
Dr. John Bryant Community Center	6/27/2014
Dr. M. L. King Community Center	6/27/2014
Family Literacy of Racine	6/27/2014
HOPES Center	6/27/2014
Humble Park Community Center	6/27/2014
Jacato Dr COP House	6/27/2014
Legal Action of Wisconsin	6/27/2014
Mayor's Office	6/27/2014
Racine Literacy Council	6/27/2014
Racine Public Library	6/27/2014
Racine Vocational Ministry	6/27/2014
Robert Quantanilla COP House	6/27/2014
SafeHaven	6/27/2014
Sixteenth St COP House	6/27/2014
Thelma Orr COP House	6/27/2014
Tyler-Domer Community Center	6/27/2014
West Sixth St COP House	6/27/2014
William Wadewitz COP House	6/27/2014
Organizations (electronic)	
United Way of Racine County	6/27/2014
Young Professionals of Racine	6/27/2014
Continuum of Care	6/27/2014
City of Racine Facebook Page	7/3,7/7 & 7/14/2014
City of Racine Website - Front Page	7/7-8/8/2014
City of Racine Intranet	7/7/2014
Press Release (electronic)	
Journal Times	7/7/2014
WRJN	7/30/2014
WGTD "Community Matters"	8/3/2014
Source: City of Racine	

The Community-Wide Needs Survey had 209 unique resident responses. There were 7 questions included in the survey on fair housing discrimination. A total of 196 residents answered the questions on fair housing discrimination. The questions asked of residents are presented in the order.

1. *Do you believe housing discrimination is an issue in your neighborhood?*

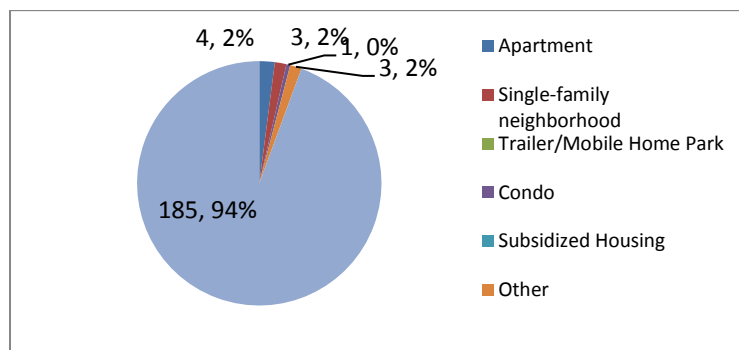
Residents largely believe that housing discrimination is not an issue in their neighborhoods with 55% responding ‘no.’ Only 4% of residents responded that housing discrimination was an issue in their neighborhood. Forty-one percent of respondents did not answer.

2. *Have you experienced discrimination in housing?*

Predominantly residents have not experienced housing discrimination with 56% responding ‘no.’ Only 3% of residents responded that they had experienced housing discrimination. Forty-one percent of respondents did not answer. There were 80 respondents who did not answer.

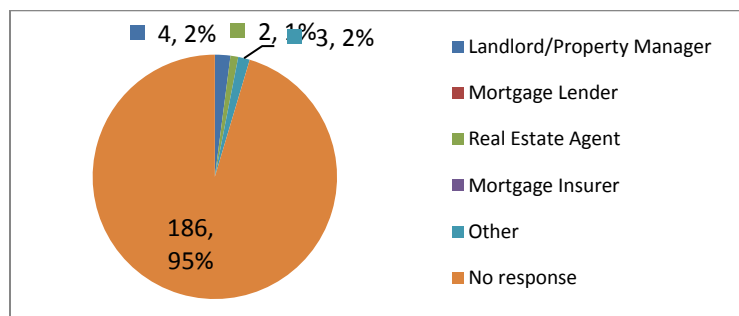
3. *Where did the act of discrimination occur?*

Of those residents that did experience discrimination, four respondents experienced it at an apartment, three experienced it in a single-family neighborhood, one experienced it in subsidized housing and three responded they experienced housing discrimination in an ‘other’ location.



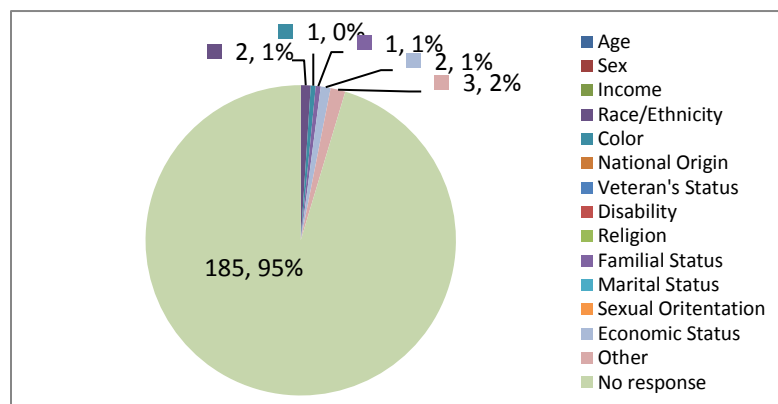
4. *Who discriminated against you?*

Of the nine persons that answered this question, four experienced housing discrimination from a landlord/property manager, two from a real estate agent and three replied ‘other.’



5. *On what basis were you discriminated against?*

Respondents were asked to indicate what type of housing discrimination they experienced. Again nine residents replied. They cited the following forms of discrimination: race/ethnicity with two responses, color with one response, familial status with one response, economic status with three responses and three 'other' responses. There were 185 respondents who did not answer.

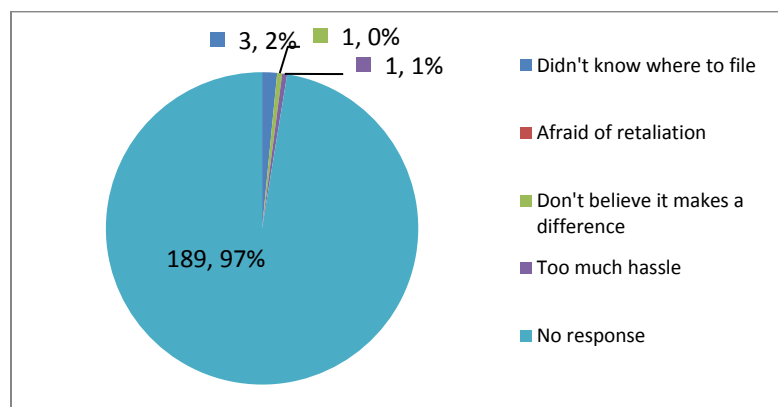


6. *Have you reported the incident to HUD, City of Racine Fair Housing, or the State of Wisconsin Equal Rights Division?*

There were eight respondents to this question, which ask residents if they had reported the housing discrimination they experienced. Only one person of the eight responded they had filed a complaint. There were 186 respondents who did not answer.

7. *If you did not report the incident, why not?*

The final question residents were asked to respond to was if they had not filed a complaint, why? Three persons responded they did not know where to file, one person believed it would not make a difference, and another thought it would be too much hassle. There were 189 respondents who did not answer.



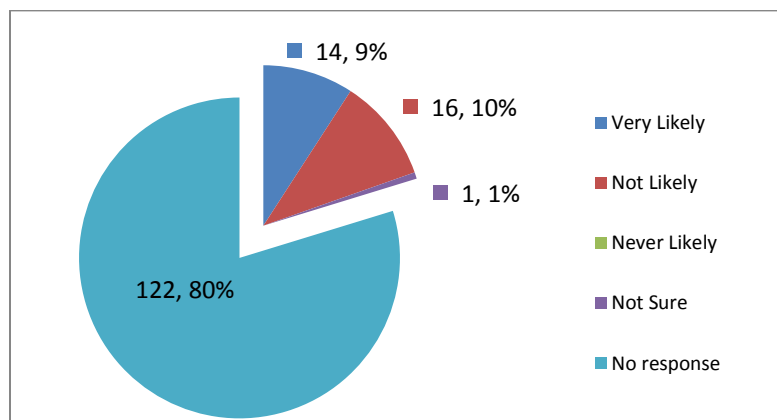
Non-profit Organization Survey and One-on-One Non-Profit Organization Interviews

The Fair Housing Division also sent out a direct mail survey to 143 non-profit organizations. The survey had a response rate of 16% with 23 organizations returning the survey. Additionally, there were 10 organizations that were selected for one-on-one interviews. These organizations dealt with housing or the housing industry directly.

Questions on the direct mail survey and the one-on-one interviews had overlap, so the results could be aggregated up into a larger sample size. The survey and the one-on-one interviews sought to find the perception of housing discrimination occurrence in the City of Racine. The questions asked of the organizations are presented in the order respondents were asked to answer. The questions are as follows:

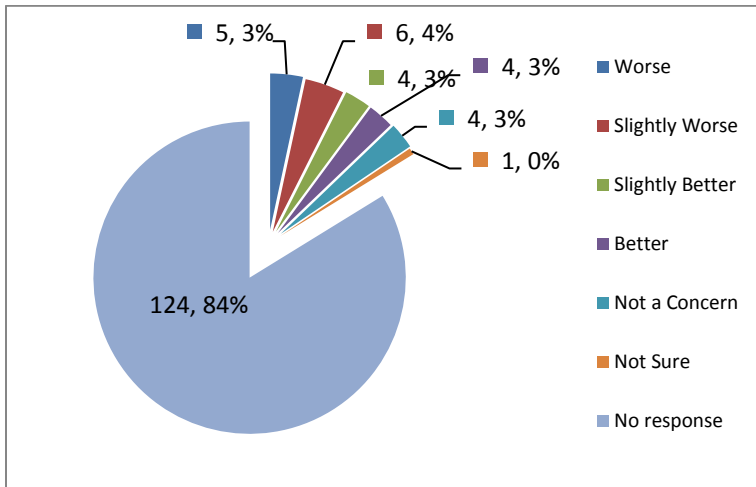
1. *How common do you believe it is to experience housing discrimination in the City of Racine?*

Nine percent, or 14 respondents, felt it was very likely to experience housing discrimination in the City of Racine; almost an equal amount, 10% of respondents that felt it was not likely their clients would experience housing discrimination in the City of Racine. There were 122 respondents who did not answer.



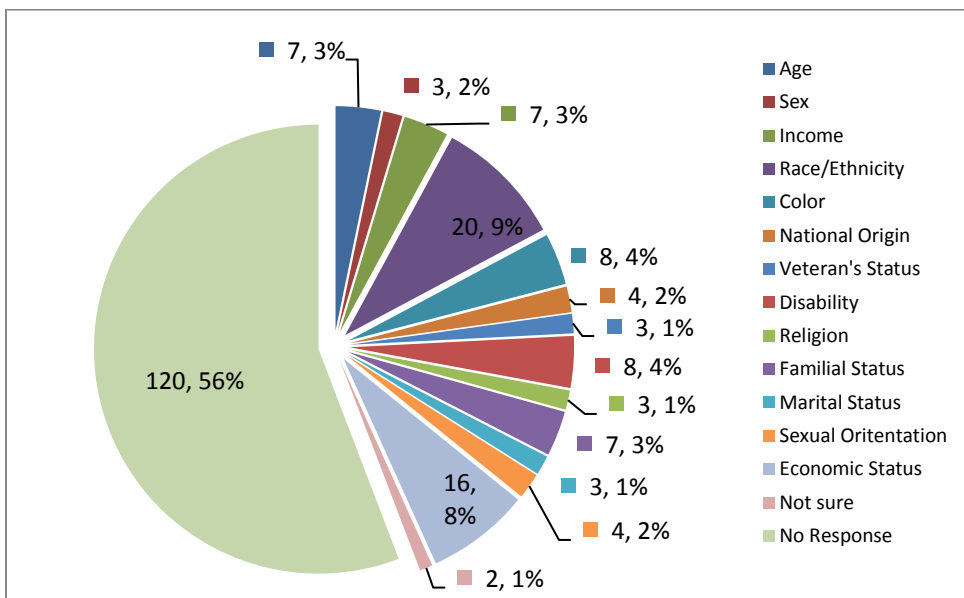
2. *In the past three years, housing discrimination is:*

This question asked respondents to indicate if they felt housing discrimination had gotten better, worse or stayed the same. Eleven respondents (7%) indicated it was worse or slightly worse, eight (6%) indicated it had gotten better or slight better, four (3%) did not believe it was a concern, and one was not sure. There were 124 respondents who did not answer.



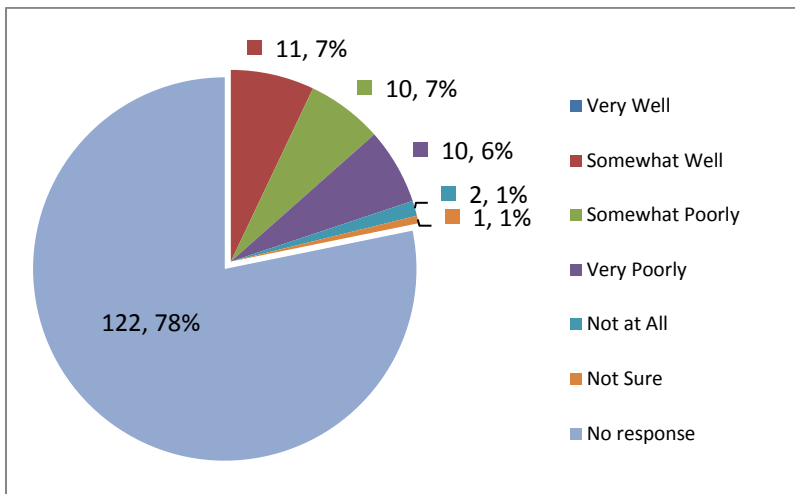
3. *Select three types of housing discrimination areas and rank them as 1, 2, and 3; where 1 is the most important.*

This question was asked as a ranking question to organizations. Most respondents only indicated three forms of discrimination without ranking them. To overcome this result the chart shown below takes the frequency of times respondents indicated a form of housing discrimination to capture what the 35 organizations that did answer the question thought were the most prevalent forms. The top three ranked forms of housing discrimination perceived to be present in Racine are: 1) race/ethnicity at 9% of responses, 2) economic status at 8% of responses, and an equal number of responses for 3) disability and 3) color at 4% of responses, respectively. There were 120 respondents who did not answer this question.



4. *How well do you feel your clients understand their fair housing rights?*

Of those that responded to the question none selected their clients understood their fair housing rights very well. Eleven respondents (7%) indicated their clients knew their rights somewhat well, ten (7%) responded somewhat poorly, ten (7%) responded very poorly, two (1%) responded not at all, and one (1%) responded not sure. There were 122 respondents who did not answer this question.

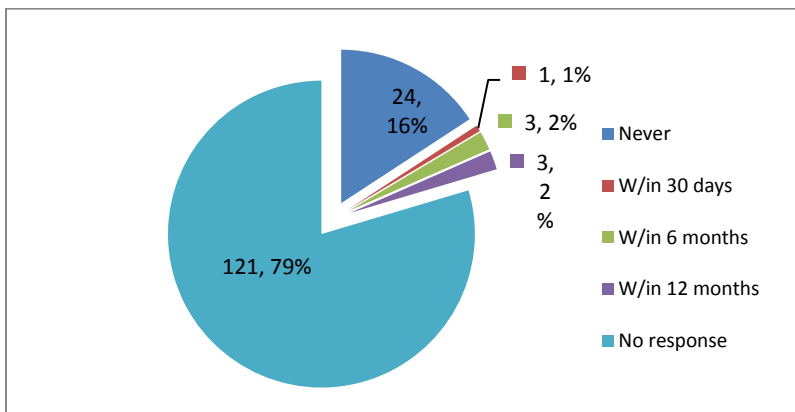


5. *What percentage of fair housing violations do you believe go unreported by your clients?*

There were 16 responses to this question and 140 no responses to this question. The average percentage of fair housing violations that go unreported was estimated to be at seventy percent.

6. *Have you contacted the Fair Housing Division?*

The following chart asks respondents to indicate if they had ever contacted the Fair Housing Division for assistance. Sixteen percent indicated they had not; one had within the last 30 days; three had within the last 6 months, and three had within the last year. There were 121 respondents who did not answer this question.



7. *Are there adequate information, resources and training on fair housing laws in the City of Racine?*

There were 10 respondents who answered 'yes' to this question and 17 respondents who answered 'no.' There were 126 respondents who did not answer this question.

8. *Would your organization be interested in any of the following at no charge to your organization?*

Of the 16 organizations that answered this question there are 15 who asked for fair housing posters, flyers or brochures; 12 who asked for staff training; and 8 who requested a group presentation. There were 140 respondents that did not answer this question.

One-on-One Organizational Interviews

There were several open-ended questions included in the one-on-one organizational interviews. Open ended questions allowed interviewees to cover topics that might not be included in the closed ended questions. The questions were:

1. *Do you know of any specific instances of discrimination? If yes, could you given an example(s)?*

- Large families (5+ members) – Won't rent to families with children
- Limited English proficiency –Language barrier often hard to overcome
- Sexual Orientation – Refusing to rent to "that kind"
- Race – Buyer not wanting to sell to a person of color
- Disability – Refusing to rent as person could physically do snow removal or other maintenance
- Victim of Domestic Violence – Evicted for domestic violence altercations

2. *What type of housing discrimination would you say it was?*

- Disability (2)
- Race (2)
- National Origin/Limited English Proficiency
- Familial Status
- Status as victim of domestic violence, sexual assault, or stalking

3. *Are you aware of any institutional or regulatory barriers for individuals trying to secure housing? If so, what were they?*

- Criminal background/sex offender (6)
- Uncoordinated discharges from DOC, hospitals, mental health organizations (2)
- Federal regulations, in general

4. *How effective do you believe the City of Racine's fair housing efforts are?*

- Effective, when engaged.
- Effective, open, ready to help.
- Response is good, but technical assistance is not as helpful.

5. *What do you believe the City of Racine could do to improve service delivery?*

- More visibility in community/marketing (6)

6. *Do you believe that there are organizations the City of Racine should be partnering with to combat fair housing discrimination?*

- NAMI (5)
- Aging and Disability Resource Center (2)
- Continuum of Care for Racine and Racine County (2)
- Housing Authority of Racine County (2)
- Society's Assets (2)
- Independent Realtors
- RAMAC
- Unified School District
- Workforce Development
- Other housing related organizations

Non-profit organization leadership is aware of fair housing discrimination that is happening in the City of Racine. Largely, they believe it is isolated in nature. They believe the need for fair housing services that exist in the City is good service when residents know to seek out them out, but that FHD has a lot of the visibility and presence it historically had in the community.

Focus Group

A focus group was held by the Fair Housing Division on June 25, 2014 at City Hall in Room 106. The focus group initially had 12 individuals invited to participate; only four individuals invited participated. The focus group reported that predatory lending is still present, but less obvious in comparison to years past. They also believe that an impediment to fair housing choice is lack of access to first month rent and security deposit at the same time. Another impediment that is recent is the application of a "double security deposit" where landlords are requesting two months of rent for a security deposit for those tenants that have had previous issues or evictions. One participant in particular perceived discrimination as a result of the elimination of the down payment assistance program that the City had previously funded and discontinued.

Their impressions of the Fair Housing Division are similar to those that participated in the one-on-one organizational interviews. They, too, believe there is a need for fair housing services, but that FHD has lost a visibility in the community.

IX. Impediments to Fair Housing Choice and Recommendations

This section summarizes the impediments, or barriers, to affordable housing choice as they relate to the City of Racine. It also provides a series of recommendations to address the impediments to fair housing choice.

Impediments to Fair Housing Choice

As was pointed out in the introduction to this AI, the effects of housing discrimination and segregation can have direct and indirect impacts on fair housing choice for those populations that are affected. They can also have broader impacts on society as a whole.

Direct impacts to barriers to affordable housing are those that include *direct* discriminatory actions, omissions, or decisions related to membership in a protected class, or *indirect* actions, omissions, or decisions that *have the effect of restricting housing choices* for people specifically because of their protected class memberships.

The direct impediments to fair housing choice are those that are causal factors in determining choices people make in regards to housing. For instance, the direct federal requirement that Low Income Housing Tax Credit be built in neighborhoods that already have high concentrations of poverty limits the ability of lower income individuals to move higher income neighborhoods that have had more investment in schools, community facilities, etc.

Indirect impediments to fair housing choices are often not causal factors in determining housing choices, but often the indirect consequences. For instance, historical patterns of segregation in communities nationwide have led to concentrated areas of disenfranchised persons that are impoverished, have higher rates of mortality, lesser rates of educational attainment, diminished employment opportunities, reduced access to services and healthcare, increased instances of crime victimization, etc. and therefore reduced access to quality and affordable housing opportunities.

Direct Impediments

1. Racine Code of Ordinances Chapter 62 Human Relations II-B should be expanded to include the following protected classes: ancestry, marital status, and status as a victim of domestic abuse, sexual abuse or stalking. Exceptions to Chapter 62 Article II should also include those that provide for solely disabled housing. (direct)
2. RFHD's funding has decreased in recent years, which has affected its visibility in the community. (direct)
3. The Affirmative Action/Human Rights Commission (AAHRC) is not fully engaged in the fair housing complaint process. It appears to need additional education and training in fair housing discrimination laws and improved communication from staff on fair housing complaints and their disposition. (direct)
4. Housing Choice Voucher holders are likely to be concentrated in the central and eastern portions of the City, which are previously established neighborhoods with high concentrations of poverty, minority and disabled populations. Eighty-eight percent of voucher holders identify as minority and on average earn \$12,800 per annum. (indirect/direct)
5. Similarly, project-based assistance at multifamily projects are concentrated in the central portion of the City. Nearly 49% of tenants at these properties identify as being minority and have an income of roughly \$11,400 per annum. (direct)
6. The Home Mortgage Disclosure Act data for the City of Racine show a significant disproportion in the number of minority applications submitted and the rates of denied applications. Black/African American

and Hispanic/Latino applicants are less likely to apply for loans and have higher rates of denial. These outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear whether these outcomes are the result of bias and discrimination (direct) or simply less comfort, knowledge, and creditworthiness. (indirect)

7. Historically, rates of foreclosure have been higher in Racine than the Region and State. Higher rates of foreclosure were concentrated in higher minority, lower income neighborhoods with high costs mortgages. (direct)
8. The number of elderly and disabled individuals is projected to increase in the City of Racine and the Region. A greater demand for accessible housing is expected. Presently there are 12,157 persons with disabilities in the City of Racine and up to 9,235 accessible units available in Racine County. (direct)
9. Homelessness nearly equally affects Black/African American and White individuals, but disproportionately affects unaccompanied men and those individuals with disabilities. There appears to be a need for additional resources for unaccompanied and accompanied men, as well as those with disabilities. The unmet needs include shelter and connection to employment services, but not necessarily workforce development services, as education attainment is relatively high (48% with high school diplomas; 23% with college experience/degrees). (direct)
10. City of Racine minority and disabled populations earn less than the median annual earnings and rely more on public transit to get to and from employment opportunities that are typically not available in concentrated poverty neighborhoods. (direct)

Indirect Impediments

11. While housing cost is lower in the City of Racine than the Region for both owner-occupied and renter-occupied housing, 34.4% of homeowners and 56% of renters are paying more than 30% of their gross household income towards housing costs. Small households with two to four related family members appear to be the most affected in the renter-occupied housing while small-related households and the elderly are most affected in owner-occupied housing. (indirect)
12. While not as segregated as some Southeastern Wisconsin communities there are concentrations of racial and ethnic minorities in central and eastern sections of the City. (indirect)
13. The disabled and elderly populations are represented throughout the City, but mostly concentrated in central Racine. (indirect)
14. Areas with high concentrations of poverty are located in central and eastern sections of the City. (indirect)
15. Areas of predominantly poor, minority, elderly and disabled populations live in the oldest housing stock in central Racine. (indirect)
16. Areas with concentrations of poverty along with high concentrations of minority and disabled populations are disproportionately affected by food insecurity. (indirect)
17. Minority households, particularly Black/African American households, have low rates of homeownership. While this is consistent with the Region, it is an impediment to fair housing choice. (indirect)
18. The City of Racine has potential for overcrowding in its multifamily dwellings that are occupied by low-income householders. (indirect)
19. Vacancy rates increased to nearly 10% from 2000 to 2010; this is higher than the recommended vacancy rates for a healthy housing market. (indirect)
20. The Home Mortgage Disclosure Act data for the City of Racine show a significant disproportion in the number of minority applications submitted and the rates of denied applications. Black/African American and Hispanic/Latino applicants are less likely to apply for loans and have higher rates of denial. These outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear whether these

outcomes are the result of bias and discrimination (direct impediment) or simply less comfort, knowledge, and creditworthiness. (indirect)

21. In Racine County, the total available number of government assisted units is 4,130 and there is a demand for approximately 12,817 units. (indirect)

No Impediment

22. Compared to the Region, the City of Racine shows no jobs-housing imbalance in terms of affordable housing options for its low-to-moderate income workforce. (no impediment)
23. When the City of Racine's Comprehensive Plan, zoning code, and building code are examined in context with the *Southeastern Wisconsin Regional Housing Plan: 2035* there are no apparent conflicts with recommendations regarding affordable housing recommendations. (no impediments)
24. It appears the various plans utilized by the Racine entities (City, Housing Authority of Racine County (HARC), and CoC) affirmatively further fair housing choice by increasing the supply of affordable housing options and their combined efforts to raise the wages of low- to moderate-income individuals. (no impediments)

Recommendations

The identified impediments to fair housing choice can be categorized into several categories: Affordable Housing, Fair Housing, Jobs/Housing Balance, Accessible Housing, Government Assisted Housing and Housing Development Practices. Some recommendations are regional in scope and may overlap with recommendations made by the *Regional Housing Plan of Southeastern Wisconsin: 2035*; other recommendations apply locally to Racine. Recommendations for each impediment category are presented below:

Affordable Housing

1. Racine's housing market has a large employment base and a large percentage of households with housing problems such as high housing cost burden. Increasing access to good-paying jobs through workforce development, transit as well as affordable housing may be necessary to reduce housing problems.
2. Focus on existing City programs such as property maintenance ordinances, repair/rehabilitation loans, energy-efficiency, and lead paint abatement programs to maintain existing housing stock. Increase usage of CDBG to make home repairs. Provide funds to assist landlords in making needed repairs to rental property.
3. Increase homeownership opportunities through continued usage of City of Racine housing loan programs into opportunities for disabled persons and minority populations, particularly Black/African American households. Seek out opportunities to partner with organizations such as National Alliance on the Mental Illness (NAMI), Society's Assets, CHDOs, HARC, Realtor's Association, etc.
4. The City, along with the CoC for Racine and Racine County, should investigate the development of supportive housing for the homeless. The City recommends that the Housing First approach be adopted. The Housing First approach addresses the need for housing first and then addresses the need for additional supportive services such as healthcare, education, employment, etc. to better get at the root causes of homelessness in the City of Racine.
5. The City, along with the HARC, should discuss the implementation of a homelessness preference in the Housing Choice Voucher Program administered by HARC to address the causes of homelessness in the City of Racine.

Fair Housing

6. Investigate the creation of a Housing Counselor/Fair Housing Program Manager in the City of Racine Department of City Development dedicated to homeownership counseling, foreclosure counseling, and fair housing advocacy and education. Possible sources of funding are CDBG and HOME funds as well as income from various housing loan funds.
7. Revise Section 62 of the City of Racine Municipal Ordinance to include ancestry and status as victim of domestic violence, sexual abuse or stalking as protected classes and expand the exception for solely disabled housing.
8. Maintain funding for RFHD to increase awareness of fair housing rights and anti-discrimination laws.
9. Increase visibility of the RFHD through targeted marketing and a more concerted push for community education.
10. Develop a more comprehensive monitoring checklist for CDBG, HOME, and ESG programs to include fair housing compliance areas.
11. Increase fair housing testing efforts in the community. It is suggested to develop a regular three to five year schedule and use an outside entity for fair housing discrimination testing.
12. Increase participation of the AAHRC in the fair housing complaint process. Provide annual education on fair housing to the AAHRC. Improve the monthly report submitted to the AAHRC to include a summary report tracking fair housing discrimination cases.

Jobs/Housing Balance

13. Promote job/housing balance; include the development of affordable housing in areas with sewer service outside central cities and improve transit service to increase access to jobs, education and job training. Increase economic development in areas with high unemployment, underemployment, and discouraged workers.
14. Expand public transportation to fully implement the 2035 Regional Transportation System Plan to maintain a jobs/housing balance.

Accessible Housing

15. Support universal design and visitability to increase accessible housing stock for persons with disabilities.
16. Analyze the American Housing Survey and U.S. Census data to estimate the number of accessible housing units in the community to help ensure that there are plentiful housing options for persons with mobility disabilities. Prioritize accessibility remodeling with funding from sources such as CDBG, HOME, Tax Increment Financing (TIF) extensions, and other sources.
17. Local government code enforcement officers and building inspectors should receive training on the accessibility requirements of State and Federal fair housing laws with regard to multifamily housing construction and rehabilitation.
18. Support funding for accessibility modifications for renters. Modify programs to allow renters and landlords to use funding sources for accessibility improvements that are available to homeowners, in consultation with the property owner as provided in fair housing laws.

Government Assisted Housing

19. Support Federal initiatives to simplify subsidized housing programs to make more efficient use of resources. Public Housing Authorities (PHAs) and entitlement jurisdictions should continue working with Federal agencies and Congress to maintain funding levels for housing and related programs.
20. Continue to work with Federal agencies and Congress to increase funding levels for additional housing vouchers to help meet the demand for housing assistance in the Region. There are 45,676 housing choice vouchers and subsidized housing units in the Region, compared to a potential need for 187,395 vouchers to help provide housing for 100,111 extremely-low income households and an additional 87,284 very-low income households.
21. Support HUD rehabilitation or replacement of existing subsidized public housing units.
22. Support the establishment of a regional Housing Trust Fund for Southeastern Wisconsin (HTF-SW) with a focus on county-specific policy goals to help achieve the objectives of the regional plan, e.g., to assist in the acquisition of land and development of affordable housing.
23. CoC organizations should expand partnerships with employment services involved in efforts to prevent homelessness.

Housing Development Practices

24. Continue using detailed neighborhood plans for each residential neighborhood or special planning district where significant urban development or redevelopment is expected.
25. Continue to promote the redevelopment and infill of vacant and underutilized sites, including the cleanup and reuse of brownfields, as a key element in planning for the revitalization of urban areas.

X. Signature Page

Reserved for Common Council adopting resolution

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- ⁱ Sean Coughlin, *US schools to have non-white majority*, <http://www.bbc.com/news/education-28937660> (2014).
- ⁱⁱ US Department of Commerce, US Census Bureau, *An Older and More Diverse Nation by Midcentury*, Releases: CB08-123 (Aug. 14, 2008), www.cenuss.gov/newsroom/releases/archives/population/cb208-123.html.
- ⁱⁱⁱ National Council on Disability, *Creating Livable Communities* (2006) <http://www.ncd.gov/publications/2006/Oct312006>.
- ^{iv} The Urban Institute, *Housing Discrimination Against Racial and Ethnic Minorities* (2013)
- ^v Andra C. Ghent, Ruben Hernandez-Murilloa, and Michael T. Owyang, *Differences in Subprime Loan Pricing Across Races and Neighborhoods*, Federal Reserve Bank of St. Louis (2014); Kathleen Engel and Patricia McCoy, "From Credit Denial to Predatory Lending" from *Segregation: The Rising Costs for America*, eds. James Carr and Nandiece Kutty, New York: Routledge, 92 (2008).
- ^{vi} The Equal Rights Center and National Council of La Raza, *Puertas Cerradas: Housing Barriers for Hispanics*, (2013).
- ^{vii} US Department of Housing and Urban Development, *Annual Report on Fair Housing Fiscal Year 2011*, 19 (2011).
- ^{viii} Margery Austin Turner, Carla Herbig, Deborah Kaye, Julie Fenderson, and Diane Levy, *Discrimination Against Persons with Disabilities: Barriers at Every Step*, US Department of Housing and Urban Development, 203, 26 (2005).
- ^{ix} Casey Dawkins, "Recent Evidence on the Continuing Causes of Black-White Residential Segregation," *Journal of Urban Affairs*, 26:3, 379-08 (2004).
- ^x Stephen Ross, "Understanding Racial Segregation: What Is Known About the Effect of Housing Discrimination?" *Neighborhood and Life Chances: How Place Matters in Modern America*, eds. Harriet Newburger, Eguenie Ladner Birch and Susan Wachter, Philadelphia: University of Pennsylvania Press, 300 (2011).
- ^{xi} Kendra Bischoff and Sean Reardon, *Residential Segregation by Income, 1970-2009*, US2010, 33-4 (2013).
- ^{xii} US Department of Housing and Urban Development, "Affirmatively Furthering Fair Housing," *Federal Register*, 78:139, 43714 (2013).
- ^{xiii} Margery Austin Turner, "Residential Segregation and Employment Inequality," *Segregation: the Rising Costs for America*, (2008); David Card and Jesse Rothstein, "Racial Segregation and the Black-White Test Score Gap," *Journal of Public Economics*, 2158 (2007); Geoffrey Wodtke, David Harding and Felix Elwert, "Neighborhood Effects in Temporal Perspective: The Impact of Long-Term Exposure to Concentrated Disadvantage on High School Graduation," *American Sociological Review*, 76:5, 713 (2011); Edward L. Gleaser and David Cutler, "Are Ghettos Good or Bad?" *The Quarterly Journal of Economics*, 112:3, 827 (1997); Dolores Acevedo-Garcia and Theresa Osypuk, "Impacts of Housing on Health," *Segregation: The Rising Costs for America*, 199 (2008); Kimberly Lochner, Theresa Osypuk and S.V. Subramanian, "Future Directions in Residential Segregation and Health Research: A Multilevel Approach," *American Journal of Public Health*, 93:2, 215 (2003); Darrell Gaskin, Gniesha Dinwiddie, Kitty Chan, and Rachel McClearly, "Residential Segregation and the Availability of Primary Care Physicians," *Health Services Research*, 47:6, 2369 (2012). David Weiner, Byron Lutz and Jens Ludwig, *The Effects of School Desegregation on Crime*, National Bureau of Economic Research, Working Paper No. 15380 (2009).
- ^{xiv} National Council on Disability, *The State of Housing in America in the 21st Century: A Disability Perspective* (2010) http://www.ncd.gov/publications/2010/Jan192010#_Toc951.
- ^{xv} US Department of Housing and Urban Development, "Affirmatively Furthering Fair Housing," *Federal Register*, 78:139, 43714 (2013).
- ^{xvi} Gregory Squires, "Fair Housing Enforcement Efforts," *Segregation: The Rising Costs for America*, 308 (2008).
- ^{xvii} Huiping Li, Harrison Campbell, and Steven Fernandez, "Residential Segregation, Spatial Mismatch and Economic Growth across US Metropolitan Areas," *Urban Studies*, 50:13, 2642, 2655 (2013).
- ^{xviii} Southeastern Wisconsin Regional Planning Commission, *The Population of Southeastern Wisconsin*, Technical Report No. 11 (2013), <http://www.sewrpc.org/SEWRPCFiles/Publications/TechRep/tr-011-5th-ed-population-se-wisc.pdf>.
- ^{xix} State of Wisconsin, Department of Administration, Demographic Services Center, *Annual Population Estimates* (2013), http://www.doa.state.wi.us/section_detail.asp?linkcatid=11&linkid=64&locid=9; Southeastern Wisconsin Regional Planning Commission, *The Population of Southeastern Wisconsin*, Technical Report No. 11 (2013), <http://www.sewrpc.org/SEWRPCFiles/Publications/TechRep/tr-011-5th-ed-population-se-wisc.pdf>.
- ^{xx} For definition of dissimilarity index: www.census.gov.
- ^{xxi} Edward Glaeser and Jacob Vigdor "The End of the Segregated Century: Racial Separation in America's Neighborhoods: 1890-2010," *Civic Report 66*, Center for State and Local Leadership at the Manhattan Institute (2012).
- ^{xxii} Paul Jaworsky, "Segregation, Neighborhoods and Schools," *Choosing Homes, Choosing Schools*, eds. Annette Lareau and Kimberly Goyette, New York: Russell Sage Foundation, 103-106 (2014).
- ^{xxiii} John Logan and Brian Stults, "The Persistence of Segregation in the Metropolis: New Findings from the 2010 Census," Census Brief prepared for Project US2010, 3 (2011).
- ^{xxiv} Capital Area Regional Planning Commission, *Geography of Opportunity: A Fair Housing Assessment for Wisconsin's Capital Region*, Final Draft Report (2013), http://danedocs.countyofdane.com/webdocs/PDF/capd/2014_Postings/FHEA%20Final/Appendix%20PDFs/Appendix%20A%20-%20Supplemental%20Background%20Data.pdf

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- ^{xxxv} For the definition of poverty: Katherine Curtis and Judi Bartfeld, *Poverty and Food Insecurity in Wisconsin and Racine County*, Family Living Programs, University of Wisconsin-Extension (2011).
- ^{xxxvi} Center on Hunger and Poverty, *The Consequences of Hunger and Food Insecurity for Children: Evidence from Recent Scientific Studies*, Brandeis University (2002).
- ^{xxxvii} Katherine Curtis and Judi Bartfeld, *Poverty and Food Insecurity in Wisconsin and Racine County*, Family Living Programs, University of Wisconsin-Extension (2011).
- ^{xxxviii} Allison Bauter, "Easy access to healthy food hampered in Racine," *Racine Journal Times*, (2013).
- ^{xxxix} City of Racine Building Inspection Department, Cityworks, 2010-2013.
- ^{xxxi} William Apgar, Christopher Herbert, and Priti Mathur, *Risk or Race: An Assessment of Subprime Lending Patterns in Nine Metropolitan Areas* (2009).
- ^{xxxii} American Planning Association, *Policy Guide on Homelessness* (2003).
- ^{xxxiii} State of Wisconsin Department of Workforce Development, *2013 Racine County Economic and Workforce Profile* (2013).
- ^{xxxiv} State of Wisconsin Department of Workforce Development, *2013 Racine County Economic and Workforce Profile* (2013).
- ^{xxxv} UW-Milwaukee for the Milwaukee development Corporation, Milwaukee 7 and Milwaukee Regional Economic Development, *Manufacturing Survey Results: An Analysis of the CEO Call Program 2006* (2006).
- ^{xxxvi} Wisconsin Advisory Committee to the U.S. Commission on Civil Rights, *Community Forum on Race Relations in Racine County, Wisconsin* (2001); Robert Charles Phillips, *The Open Housing Drive in Racine: 1963-1970*, Racine Chapter of the NAACP (1972).