

Joint Analysis of Impediments to Fair Housing Choice

DRAFT – January 2019



JOINT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Draft – December 2018

SPARTANBURG COUNTY, SC



Community Development Department

CITY OF SPARTANBURG, SC



Neighborhood Services Department

SPARTANBURG HOUSING AUTHORITY



Prepared for Spartanburg County, the City of Spartanburg, and the Spartanburg Housing Authority by Mosaic Community Planning, LLC



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CHAPTER I.

INTRODUCTION

AFFIRMATIVELY FURTHERING FAIR HOUSING

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulates that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provides publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice extended that deadline until at least October 2020. The notice further required that grantees instead prepare and keep on file a current “Analysis of Impediments to Fair Housing Choice” (AI).

In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

Mosaic Community Planning assisted Spartanburg County, the City of Spartanburg, and the Spartanburg Housing Authority with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but is also compliant with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, the County, City, and Housing Authority used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

- 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.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Spartanburg and Spartanburg County. The City, County, and Housing Authority used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, focus groups, interviews, and a communitywide survey.

Public Meetings

Two meetings open to the general public were held to inform the community about and gather information for the Analysis of Impediments to Fair Housing Choice. Each meeting began with a short presentation providing an overview of the AI, related fair housing law, how to access HUD-provided fair housing data, and ways to provide input for the study. The remainder of the meetings consisted of an interactive discussion of fair housing, neighborhood conditions, and community resources in Spartanburg and Spartanburg County. A total of 9 members of the public attended the two meetings. Meeting dates, times, and locations are shown below:

Public Meeting #1

Monday, June 18, 2018
6:30 PM
Cleveland Park Events Center
141 North Cleveland Park Drive
Spartanburg, SC 29303

Public Meeting #2

Tuesday, June 19, 2018
6:30 PM
Spartanburg Community College Auditorium
220 East Kennedy Street
Spartanburg, SC 29302

In addition to these two public meetings, the Spartanburg Housing Authority held a third meeting for its residents. This meeting began with a short overview of the AI content and process and then moved into a discussion of fair housing, neighborhood conditions, and community resources in the city and county. Twenty-three residents attended the meeting, whose date, time, location is shown below:

Housing Authority Resident Meeting

Tuesday, August 7, 2018
10:30 AM
Archibald Rutledge Senior Center
764 North Church Street
Spartanburg, SC 29303

Focus Groups

Working with local nonprofit organizations, the City, County, and Housing Authority also held two focus groups targeted to various types of households. Like the public meetings, the focus groups began with an explanation of the Analysis of Impediments to Fair Housing Choice, related fair housing laws, and ways to participate in the study. Focus group leaders then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in the city and county. A total of 24 people participated in the focus groups. Meeting dates, times, and locations are shown below:

Focus Group #1

Monday, June 18, 2018

10:00 AM

Middle Tyger Community Center

84 Grocer Road

Lyman, SC 29365

Focus Group #2

Wednesday, June 20, 2018

Noon

Upstate Family Resource Center

1850 Old Furnace Road

Spartanburg, SC 29316

Stakeholder Interviews

During the week of June 18, 2018, individual and small group stakeholder interviews were held at the Spartanburg County Community Development Office and Spartanburg Community College. For people unable to attend an in-person interview, telephone interviews were offered. Stakeholders were identified by the Spartanburg County Community Development Department, City of Spartanburg Neighborhood Services and the Spartanburg Housing Authority. They represented a variety of viewpoints including fair housing/legal advocacy, housing, affordable housing, community development and planning, education, employment, homelessness, people with disabilities, seniors, and others.

Interview invitations were made by email and/or phone to about 60 stakeholders. Thirty-one people participated in an interview, and several invitees participated in other manners, such as by attending a public meeting, hosting a focus group, or taking the community survey. Organizations from which one or more representatives participated in the development of this AI include:

- City of Spartanburg Department of Public Safety
- City of Spartanburg Neighborhood Services
- City of Spartanburg Planning and Zoning (2 interviewees)
- City of Spartanburg Property Maintenance and Housing Inspections
- Forrester Center for Behavioral Health
- Habitat for Humanity
- The Haven, Inc.
- Hispanic Alliance (2 interviewees)
- League of Women Voters
- Middle Tyger Community Center
- New Day, Inc. of Spartanburg
- Northside Development Group
- Piedmont Care, Inc.
- ReGenesis CDC

- SAFE Homes Rape Crisis Coalition
- Spartanburg Association of Realtors (2 interviewees)
- Spartanburg County Administration
- Spartanburg County Environmental Enforcement
- Spartanburg County Planning and Development Department (2 interviewees)
- Spartanburg County Veteran’s Affairs Department
- Spartanburg School District 7
- Spartanburg Soup Kitchen
- USC Upstate
- United Housing Connection
- Upstate Family Resource Center
- Upstate Workforce Investment Board
- Urban League of the Upstate
- Wofford College
- World of Change Ministries

Community Survey

The fourth method of obtaining community input was a 26-question survey available to the general public, including people living or working in Spartanburg and Spartanburg County, and other stakeholders. The survey was available online and in hard copy from early June through early August 2018. A Spanish translation was also available online and in hard copy. Paper copies were available at the AI public meetings and focus groups and at several community events held during the summer of 2018. The Spartanburg County Community Development Department had a booth with surveys available at a first-time homebuyers seminar and a Juneteenth celebration. City of Spartanburg Neighborhood Services hosted a booth with activities and surveys at a community-wide back to school event. A total of 250 survey responses were received, including two in Spanish.

Public Comment Period and Hearing

The City of Spartanburg, Spartanburg County, and the Spartanburg Housing Authority will hold a 45-day public comment period and public hearings to receive input on the draft Analysis of Impediments in January and February 2019. Further details about the comment period, including any public comments received, will be included here in the final draft of this document.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. Notice was given to residents through a public notice in the *Spartanburg Herald-Journal*, on the Spartanburg County Community Development Department’s website, the City of Spartanburg Neighborhood Services website, on Nextdoor, through a press release to local news outlets, and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews, as well as other local organizations. In all meeting

advertisements, information for anyone needing special accommodations (including translation, interpretation, and services for people with disabilities) was provided, but none were requested.

A website was also developed for the project with information about the study, how to participate, and how to find out additional information about CDBG and other HUD programs and requirements. The site had more than 1,000 visitors as of October 2018.

COMMUNITY ENGAGEMENT RESULTS

A total of 337 people participated in the community engagement process used to develop this AI. Twenty-four participated in interviews, 22 attended a public meeting or focus group, and 71 responded to the survey.

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in development of this AI, and no comments or surveys were not accepted. Note that these comments do not necessarily reflect the views of the Housing Authority, Spartanburg County or the City of Spartanburg.

Public Meeting and Focus Groups

1. What do you like best about your neighborhood? What keeps you there? What neighborhood qualities would you look for if you were to move?
 - Like living in the country – it is quiet, safe, clean
 - Live in the same old farmhouse was raised in – would never consider moving
 - Moving is trouble and expensive
 - House is paid for and couldn't sell it and have enough to buy in a better neighborhood
 - Would move to be nearer to family; family and social networks are important
 - Interaction with diverse group of neighbors
 - Was important to have a garage and yard and other creature comforts when last looked for a new home
 - Maintenance; building is well taken care of
 - You have to make a stand somewhere – commit to a place and stay there and make the best of it
 - Reluctance to “start over” if moved to a different area
2. What are the greatest fair housing needs in the community? Are there parts of the city or county that are particularly affected?
 - There's not enough housing for seniors
 - For seniors, a home that may be affordable on two pensions or social security incomes can suddenly become unaffordable if one spouse dies or goes to a nursing home
 - Home repairs and assistance with affording repairs
 - Rent often costs as much as a mortgage

- Homelessness is not just a city issue, occurs in the suburbs too; People live in tents because there's not enough affordable housing
 - The market for construction of small single-family homes, like mill houses, is gone
3. What parts of Spartanburg and Spartanburg County are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
- East side of Spartanburg – several grocery stores within one mile, new schools, jobs, retail, hospital, and public transportation
 - West side of Spartanburg – Westgate Mall, good schools, interstate access
 - North side of Spartanburg – public transportation, medical offices, drug store
 - Moore – brand new subdivisions
 - South Converse
 - Proximity to Department of Social Services, job services, businesses and shopping
 - Some historical conditioning about where people live that contributes to ongoing segregation
 - County is not as diverse; segregation in terms of where people live between the city and county
4. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- People with disabilities would have different needs related to accessibility which would limit their choices
 - Reality is that some groups aren't likely to have the same jobs or income as one another; relationships, alma maters, collegiate affiliations, churches, and family connections will all influence the type of job you get and where you live
 - Can be an unwillingness to share information here; it's hard to have conversations about race.
5. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Discrimination happens; called about an apartment as was told it wasn't available, but a white friend was able to get through
 - "A crook is not a crook until he is caught;" Landlords will continue taking advantage until they are caught
 - Had a lawsuit related to not getting an apartment but hasn't heard about the outcome of it yet
 - Lack of access to housing has a ripple effect, impacting crime and homelessness
6. Are people in the area segregated in where they live? What causes this segregation to occur?
- Segregation is somewhat ingrained in local culture – reflected in where you go to church and social networks starting as a child
 - People choose to live in the same area as others of their nationality
 - There are clusters of Hispanic families; this especially occurs when they don't have legal immigration status; Hispanics with legal status are fairly evenly dispersed within the community

- Area is still pretty segregated; people may work with a diverse group of coworkers but social networks are generally not as diverse; changing somewhat with downtown revitalization
- There's a disconnect between what's happening in rural areas (Chesnee, Inman, Landrum) and what's happening in Spartanburg

7. Is there an adequate supply of housing that is accessible to people with disabilities?

- Generally, options are pretty poor
- Someone who lives in a Housing Authority property or has a voucher and knows their rights can get accommodations
- Tenants may know they can request accommodations but landlords won't make them despite the law
- Critical tie-in between housing, transportation, and employment opportunities; your life can be very limited without these
- May be related to supportive service and medical care needs as well
- Housing Authority applied for 500 mainstream vouchers and funding for housing for people with mental disabilities; also receiving \$200,000 in tenant-based rental assistance (TBRA) from County particularly for housing for elderly residents and people with a disability

8. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

- South Carolina Legal Services offers some workshops at the library
- People don't know where to go for help
- A lot of people haven't thought about this since they've never been in the situation of needing to know

9. Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods?

- If the County hadn't spent so much to build a new courthouse, think how much affordable housing could have been built
- City and county should put money into fixing up the things that people pay taxes to support rather than building new buildings; tax revenue should go to where it's most needed
- Perception about resource distribution depends on where you live; City may focus on one neighborhood (ex: Northside, Highland) and then other neighborhoods complain
- Sometimes resource distribution depends on more than city or county; relationships with nonprofits may bring in investment
- Can be difficult to make an impact with limited CDBG funding; it may make sense to concentrate investment in one area for a few years in order to see a change (example: money the County put into Una over 5-7 years)
- Spending is influenced by elected officials' priorities
- Some participants do say resource distribution is fair

10. Is there anything we haven't discussed that you feel is important to our research?

- Grant-based programs won't serve home repair needs for people living in mobile homes

Stakeholder Interviews

1. What are the greatest fair housing needs in the community? Are there parts of the city or county that are particularly affected?

- Banks appraise homes differently on the north versus the south side of Spartanburg; makes it difficult to build in south Spartanburg or sell your home there; impedes neighborhood revitalization
- Rent hopping – people can only afford a place for a month; They get cleaned up then move on and default on the lease; More common in the city (examples: tents are set up at a dollar store ½ mile from City Hall, people sleep on the ramp at the old car dealership in the same area, near the medical center people have set up camps)
- There is some affordable housing but it's not in good condition
 - Close to downtown there is not affordable housing
 - In the county near distribution centers there are jobs but not housing nearby; these areas are not served by public transportation
 - No housing near IH corridor, what exists is in poor condition
- Need affordable housing with livable conditions, heat/air condition, parking not in the yard, etc.; Lower income areas are worse; No rental registration
- Quality of City's rental stock is an issue; tenants won't report housing problems because they don't want government officials or the police in their homes
- Landlords skirt the line of what they are legally allowed to do to get someone to move out of a unit
- Requirements change for renters when ownership changes (IDs, paperwork, etc.), can be challenging, especially for families with children
- Households with vouchers have difficulty finding places to use them
- No affordable housing for very low income group
- Spartanburg's housing market is very affordable; there are livable, good condition affordable homes available for \$60,000 – but supply is limited
- Affordability: \$700 is the lowest rent you can pay for anything that's decent
- County is affected by lack of affordable housing, especially subsidized
- Need more affordable housing for families, and preference is for vouchers rather than physical units; There is such a shortage of vouchers and they don't move around much
- Education about finance, interest rates; There is redevelopment, but previous residents who were displaced can't afford the new housing
- Homebuyer education and financial counseling (credit repair, financial stability, etc.) are needs, especially for low and moderate income populations
- Lack of variety of housing for housing, especially low-income. Services are not close to affordable housing
 - East and west sides have access
 - North is improving but needs grocery/drug store

- South side is lacking. Education and information about job programs and programs for kids is needed in Highland area
 - Transportation connection is often lacking between affordable neighborhoods and employment centers
2. What are Spartanburg and Spartanburg County's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
- Converse Heights is popular with young couples
 - Converse Heights and Duncan Park on the Eastside; Park Hills and Camelot on the Westside; These areas are attractive, lush, green, with big lots and trail access but they are also far from commercial developments, have no sidewalks, and no foot traffic
 - Hampton Heights is a neighborhood in transition; It is improving and becoming a neighborhood of choice
 - East side, country club area
 - East side, protected, upper class and Caucasians live, high demand for this area
 - East side and west side; Barriers include:
 - Information and literacy of someone looking
 - Not a lot of rentals in those areas
 - Word of mouth and personal networks are important to locating and obtaining housing; Someone without the right connections (employer for example) may face challenges
 - North side, because of redevelopment efforts there, although lack of good jobs in the area may be a barrier
 - Woodfin Ridge, River Falls
 - Boiling Springs is a blossoming neighborhood; people like it because of new development, proximity to downtown Spartanburg, unincorporated so not paying city taxes
 - Duncan Park is a more mixed, diverse neighborhood with rental homes that have blended in well
 - City of Spartanburg in general is becoming more attractive to people because of the growth in Greenville; Spartanburg is a more affordable option
 - Downtown Spartanburg because of revitalization and mix of uses; attracts people who want to live in more urban setting
 - Greer and Woodruff because of industrial development, jobs, and high end housing
 - Inman and Moore have new developments; no limitations to moving there for higher-income folks; transportation and housing cost are barriers to low or moderate income households
 - Duncan, Moore, and Greer have industry and jobs
 - Chesnee and Inman because they're small towns and have good community spirit
 - Propaganda impacts where people want to live (ex: perceptions of school districts driving people from one area to another); Realtors can perpetuate that
 - Some of these areas require car ownership – there's no transit provided outside the city
 - Cost of living, social barriers
 - Spartanburg is focusing on redevelopment, improving services in areas of low opportunity, for example, early learning center; A challenge is to educate people on opportunities
 - The barriers to areas of opportunity are psychological; These areas are primarily white which may discourage people of color from wanting to live there – it would be a different culture

- A person of color might get some stares in Converse Park
 - There are invisible barriers to neighborhoods like Converse Heights; In some cases, the sidewalks just run out
 - Transportation to some better paying jobs, but not access; South has the most challenges; Some children can't walk to park, too far and not safe
 - Transportation is the biggest barrier to accessing any areas of opportunity located outside the city
 - Sometimes people who would otherwise want to move to an area of greater opportunity don't know how to go about building credit, purchasing a home
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Some people may be dissuaded from buying; Benefits may decrease for someone as income increases
 - Will not have the same options; Someone may have child support, when the other doesn't
 - Race is an issue, not overt but it's there; A white male would find it easier than a black male or female
 - Race issues, especially on the east side; May feel discouraged to live in some areas because of race
 - No, they wouldn't have the same choices, some areas of county have restrictive covenants and fees
 - No, a landlord may look at how you present yourself and make a judgment about whether you would fit in
 - Yes, if you use the right Realtor; Steering happens, people are told they "wouldn't feel comfortable" in certain neighborhoods
 - Yes, on the surface they would
 - People would have the same range of options – their choice would be driven by which neighborhoods they feel like they know
 - Options would be different, especially for a family with children or someone with a disability
 - Having a disability may limit one's housing choices; higher income households would be more able to afford accommodations
 - Employer affiliation opens doors; Outsider status makes it more challenging, especially for minorities; Intersectionality amplifies this
 - People of stature and income, no matter their race or background, can live wherever they choose
 - Absolutely options would be different; The housing authority will run a background check on new tenants and a lot of times, it will exclude Black families for criminal histories
 - For parents, barriers that impact housing choices are access to schools and childcare
 - Yes, range of choices available to you is generally based on your income
4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Have not seen evidence of housing discrimination
 - Not aware of specific instances, but sure it happens

- Heard stories
 - It happens; For example, some property listings are not posted and shared only by word of mouth so that the transaction can be discriminatory
 - Subtle, not in the open; Homeless population pushed to certain areas
 - Yes and no; You don't hear about discrimination because it's so established in people as far as what neighborhoods they would consider to live in
 - Have a sense that there is discrimination against LGBTQ and interracial households
 - Work with realtors on fair housing including trainings, conferences, webinars, etc.; Diversity of people in the real estate business matters; Make connections between nonprofits and real estate industry
 - There is definitely religious bigotry here; When people talk about "good family values" in Spartanburg, they mean they are not supportive of gay people and non-Christian religions; People coming to Spartanburg for its "good family values" tend to be richer and conservative
 - If a landlord could get away with not renting to a Muslim or someone who is Black, he or she would try to do so
 - Discrimination in refusal to accept Section 8 vouchers
 - Discrimination in lending and appraisals that makes it more difficult to build a home on the south side
 - Yes, but difficult to distinguish because it's not always obvious to those who are discriminated against; Education of community leaders who work with clients to help identify discrimination and provide resources; Opportunity to work with owners to resolve issues
 - Yes, you hear this from homeless families a lot, but they also may have other obstacles (poor financial histories or criminal histories) to obtaining housing
 - In Boiling Springs there was a community meeting where attendees referred to "those people" and made comments perceived to be disparaging toward poor Black residents
 - I don't think there's much; Maybe among non-professional landlords who aren't using a property manager
 - Society in general has conquered a lot of fair housing issues, such as steering and redlining
5. Are people in the area segregated in where they live? What causes this segregation to occur?
- Yes, historical patterns of segregation, "model cities" south side of Spartanburg, was African American, and African Americans moved back
 - Downtown Spartanburg is not as segregated as outlying areas
 - Medium income areas are diverse; Not very segregated city
 - Depends on the area you go to; Older subdivisions integrated but higher end are more segregated; People move out if too many of another group move in; This happens with churches too
 - People migrate to certain areas because there are areas that have historically been white or Black; Newer developments that don't have that history attached may be more diverse
 - It's just tradition – people of color live in certain places
 - Areas of concentration of Hispanic, Laotian, Russian. People settled around their church/temple; Has impacts on the school system
 - The colleges in Spartanburg help by attracting diverse faculty, staff, and students who tend to be younger and less concerned or aware of historical patterns of segregation

- Segregation persists because income disparities continue to persist between white and Black populations
- If incomes were more equal, people would mix more; People want to live in a neighborhood with people they are comfortable with
- There are perception issues: some people may be afraid to live in a neighborhood of people who are different; White people choose white neighborhoods because they feel safer there and they may be more well-kept
- Some economic and choice components to segregation
- Some mobile home parks are all Hispanic; Cost is a factor in making it that way
- It's not all based on income: poor whites live in the county; poor Blacks live in the city
- The city is fairly segregated by neighborhood, but some are more integrated closer to downtown
- The county is similar, but Hispanic population concentration is just outside city limits; Segregation is a historic pattern but shifting based on employment
- Generally, there is segregation between the city and county
- If you are low-income and white, you live in a rural area; if you are Black or a person of color and low-income, you live in the City
- Many Latinos live in Arcadia, outside the City
- Yes, they are segregated; Language barriers create clusters where the same language is spoken
- Yes, but it is becoming less segregated over time; Historical patterns, laws, and policies contributed to this
- Some city neighborhoods are segregated, but others less so; people often look for a neighborhood of people who look like them
- Spartanburg area falls in line with a lot of other counties where the city is more dense and diverse and the county is more segregated and white
- More efforts to address segregation in recent years, particularly in public housing

6. Is there an adequate supply of housing that is accessible to people with disabilities?

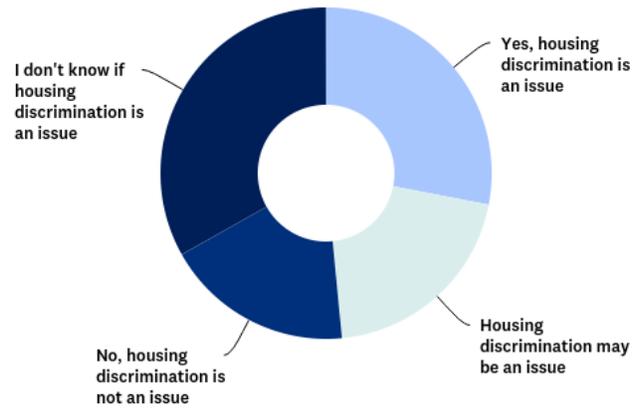
- No, there isn't an adequate supply and there will be more need as the population ages
- Homeowners can make modifications if they can afford it but renters would have trouble finding anything accessible
- Shortage, older housing stock
- Single-story housing is available and could be modified but it takes funding
- Housing for people with mental or developmental disabilities depends on a person's unique needs
- Could be more; There is a group of nonprofits that provide accessibility
- Not enough information to answer
- Some in city and county, need more accessible or could be adapted; Charles Lea Center is trying to put people in apartments
- Less experience with working with disabilities, but a few people with disabilities have had trouble finding housing near transportation
- There needs to be a step between independent living and a group home – something where people with disabilities live nearly independently with just daytime staff
- Need supportive services to keep people who have disabilities in their housing – to help with budgeting, making sure rent is paid, etc.

- Doubtful that landlords are very welcoming to people with disabilities
 - The Charles Lea Center is an important resource for housing this population
 - Extremely limited housing choices
 - There may be some minor issues around development standards – in the county, some communities claim their deed restrictions can prohibit group homes
 - Accessible transportation connections are extremely important
7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- United Way does some fair housing education
 - Spartanburg Housing Authority should probably do more
 - Not familiar with programs
 - SHA would be first point of referral for a fair housing concern
 - The City, County, and SHA do most local fair housing education – they also enable and equip other partners
 - Handled through Neighborhood Services; Someone looking may have to know who to ask
 - Housing Authority provides some
 - Legal Services provides assistance for fair housing, board of human relations; Organizations are under-funded but it is better than it used to be; Nonprofits provide services but they would benefit from training
 - The Urban League does fair housing education and offers translations
 - Hotline for complaints hosted jointly by the City and County
 - Some billboard campaigns; Resources are available but may not be clear or accessible to everyone
 - Habitat provides some education
 - The people who need the education will also need transportation to get to a meeting or event to receive it
 - SC Works includes some education on fair housing in its programs
 - The City and SHA do try to push fair housing information out, but it is difficult to reach the people who most need the information.
 - The Board of Realtors provides fair housing courses for new members and sends out regular reminders to members about fair housing requirements
 - The City and County CDBG programs do a good job with fair housing and make good use of social media
 - The City's holds fair housing fairs to give out information, but they're not very effective because people don't participate
 - There are a lot of service providers trying to provide this but it doesn't seem well-coordinated
 - Difficult because the city and county have only so much control over private landlords
8. Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods?
- Evenly distributed, City has done a good job
 - The best parks are in the county; Evenly distributed

- Some places get more than their fair share; Trash pickup, some areas stay longer; Higher income areas get better service and roads
 - South side is lacking parks; More services within the city than in the county; The city has neighborhood watch, National Night Out, county doesn't have these and has fewer opportunities to distribute information; Opportunity to make use of existing events to make connections, gather information, provide information on housing; Some events are on weekends, public officials could be more involved in those
 - Spartanburg is pretty equitable; Lots of resources have been put into changing neighborhoods for the better
 - City has done a good job being equitable; Have tried to provide development near downtown
 - County much less equitable across the board, particularly regarding parks and areas to walk; Some areas have much less investment and service. County has private trash collection with varying quality of service
 - The City Manager is "no nonsense;" Majority of service requests may come from Converse Heights, but no one gets special treatment or moved to the front of the line
 - The Northside seems to be getting a lot of extra attention
 - Resources are evenly distributed; You can't do everything for every place, all the time; There has to be some rotation
9. Is there anything we haven't discussed that you feel is important to our research?
- Concern for homeless, need more shelters, especially for women; Need programs, education
 - Concern about redevelopment on the north side; Residents who were there before may not be able to go back; Happened before on the south side; Gentrification; People feel like they may be excluded because of race; Concern with how city will make sure they have access to these areas
 - Most important thing to identify and build affordable housing, and to identify markers and progress; Some desire to provide affordable housing and information about housing, partnerships to address these issues; Leaders of nonprofits have good understanding of the issues; Cooperation has increased
 - Latino outreach is needed; There sometimes are translation services available, but there are other barriers too; For example, homeownership can be a foreign concept among certain cultures, as can banking in general
 - More conversations from different sectors helps to continue to improve situation and build stronger networks
 - A City rental registry ordinance meant to address absentee landlord and slumlord problems failed in City Council; was said to place an undue burden on landlords
 - Poverty and affluence don't mix; People don't or can't understand how the other half lives
 - Where you live determines your job prospects; If you live in the city and are poor, you likely end up with a service-sector job as a dishwasher with not advancement possibilities; In the county, you could work in manufacturing, with better advancement opportunities
 - There's a big need for 3rd shift childcare to cover shoulder hours: 6:00 am, 7:00 pm, etc.
 - There is racial inequality from birth on in every aspect of life in Spartanburg

Community Survey

- 15% of survey takers experienced housing discrimination since living in Spartanburg or Spartanburg County. Most people were discriminated against by a landlord or property owner. Familial status was the most common basis for discrimination, followed by race and disability
- Only three of the 24 people who experienced discrimination filed a report of it. Reasons for not reporting included not knowing what good it would do, not knowing where to file, and not knowing it was a violation.
- When asked to select whether they think housing discrimination is an issue in Spartanburg and Spartanburg County, 28% of respondents said “yes,” 20% said it “may be an issue,” and 18% said “no.” The largest share of survey takers – 33% - said they “don’t know if housing discrimination is an issue.”
- When asked to identify whether they think various factors may be barriers to fair housing in Spartanburg and Spartanburg County, respondents’ top selections were:
 - Lack of housing options for people with disabilities (selected by 46% of respondents);
 - Landlords refusing to accept vouchers (selected by 44%);
 - Not enough affordable rental housing for large families (selected by 44%);
 - Neighborhoods that need revitalization and new investment (selected by 43%); and
 - Displacement of residents due to rising housing costs (selected by 41%).



DRAFT

CHAPTER 3.

SOCIOECONOMIC PROFILE

DEMOGRAPHIC PROFILE

According to data provided through HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool (Version AFFHT0004, released November 17, 2017), the total population of the City of Spartanburg is 36,755; Spartanburg County outside of Spartanburg has a population of 215,913. Spartanburg County along with Union County comprise the Spartanburg region with a total population of 313,268.

From 1990 to 2010, both Spartanburg County and the region experienced substantial growth in population at a rate of 40.1% and 21.8%, respectively. Over the same period, the City of Spartanburg experienced a 16.9% decline in total population.

Race/Ethnicity

The two largest racial groups, non-Hispanic white and Black populations, make up 93.2% of the total population in the City of Spartanburg. The Black population comprises 47.3% of the total population and is the slight majority. The white population accounts for 45.9% of the total population after experiencing a 31.4% decline in population between 1990 and 2010. The Black population also experienced a decline in absolute numbers (-5.9%) during this period but expanded in percentage of the total population by 5.6%.

All other racial or ethnic groups combined account for 7.5% of the city's current population. The Hispanic population is the largest of these groups after nearly quadrupling in size between 1990 and 2010 to comprise 3.5% of the current total population. The Asian or Pacific Islander population experienced a population increase of 87.9% and doubled in proportion to make up 1.9% of the current population. Native American, two or more races, and other groups account for less than 2% of the total population.

The racial and ethnic composition of Spartanburg County is more disproportionate than the City of Spartanburg. Non-Hispanic whites comprise 74.3% of the total population in the county while the second largest racial or ethnic group, the Black population, accounts for just 15.9%. The city and county experienced similar decreases of approximately 10% in the percentage of non-Hispanic whites from 1990 to 2010. Other racial and ethnic groups follow similar patterns of growth across city, county, and region, but the growth of minority groups in the county and region far outpaced the City of Spartanburg. The Hispanic population has experienced exponential growth from comprising merely 0.6% to over 5% of the total population in both Spartanburg County and the region. The Asian or Pacific Islander and Native American population increased by over 300% in both Spartanburg County and the region.

National Origin

Foreign-born residents account for 3.9% of the current population in the City of Spartanburg. The foreign-born population experienced modest growth since 1990 considering the overall population decline of the city. Spartanburg County's foreign-born population experienced much faster growth than the city during

this period. Only 1.6% of the county's total population reported as foreign-born in 1990, but by 2010 the proportion expanded to account for 5.8% of the total population. The Spartanburg region showed a similar growth rate to that of the county.

The top three countries of origin among foreign-born residents in the City of Spartanburg are Mexico, Germany, and the Philippines. Close to half of the foreign-born population in Spartanburg County and the region originate from Mexico. Spartanburg County is also home to a large Ukrainian population that represents 10.7% of the foreign-born population. Other significant countries of origin include south and southeast Asian countries like India, Laos, the Philippines, Nepal, and Cambodia.

LEP

The population dynamics with limited English Proficiency (LEP) often resemble patterns of population change found among foreign-born residents in a community. While the LEP population in Spartanburg County and the region mirror the steady growth found among the foreign-born population, the City of Spartanburg deviated from this pattern. The LEP population in the City of Spartanburg peaked in 2000 and declined in 2010 while the foreign-born population experienced marginal growth. This deviation suggests a disproportionate influx of residents from countries that possess a higher level of English proficiency like Germany, Canada, and other European countries.

The primary languages of the LEP population in Spartanburg County and the region are closely associated with the national origin of the foreign-born residents. Close to 70% of the LEP population in the county and region speak Spanish. 16.8% of the county's LEP population and 13.4% of the region's LEP population speak either Russian or other Slavic languages. Laotian, Vietnamese, and Cambodian languages are the most common Asian languages spoken by the LEP population in Spartanburg County and the region while Tagalog, Korean, Nepalese, and Indic languages are most common outside of Spanish in the City of Spartanburg.

Disability

The population with disabilities in the City of Spartanburg, Spartanburg County, and the region have similar distributions by disability type. The most common disability type reported across the city, county, and region is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 10.9% of the city's total population and 8.7% of the county's total population. Disabilities that require extensive assistance such as difficulties with independent living or self-care make up a 10.0% and 8.9% of the total population in the city and the county, respectively. The population with sensory disabilities, hearing and vision difficulty, account for 6.0% of the total population in the City of Spartanburg while affecting 6.5% of the population in Spartanburg County. Similar proportions of the population have reported difficulty with cognitive functions in the City of Spartanburg (6.9%) and Spartanburg County (6.0%).

Age

The age distribution of the population in the City of Spartanburg and Spartanburg County are similar and follow normal distribution patterns. The majority of the population, approximately 60%, in both the city and county are between the ages of 18 and 64. All age groups in the City of Spartanburg experienced a

decline in absolute numbers due to the overall population loss since 1990. The proportion of the population under the age of 18 decreased by 1.5 percentage points but remains the second largest age group in the City of Spartanburg. The population that is 65 and over represents 15.6% of the total population in the City of Spartanburg.

The overall population growth in Spartanburg County had little effect on the age distribution of the population. The population under the age of 18 in Spartanburg County expanded slightly in share size to comprise 24.7% of the total population. In comparison with the City of Spartanburg, the 65 and over population accounts for a smaller percentage of Spartanburg County's total population (12.9%) but experienced a 60.0% increase in population from 1990 to 2010.

Sex

The gender distribution of the City of Spartanburg is skewed in favor of the female population. Females comprise 55.7% of the population resulting in an 11.4 percentage point difference between male and female populations. The gender distribution of Spartanburg County is more balanced between female (50.8%) and male populations (49.2%).

Family Type

The City of Spartanburg experienced a 23.9% decline in the number of families with children between 1990 and 2010. The share of families with children also declined to comprise 43.3% of families in the city. Conversely, the number of families in Spartanburg County and the region grew by 26.3% and 9.7%, respectively. Regardless of the growth in absolute numbers, the percentage of families with children declined by approximately 2% to comprise around 43% of families in both the county and the region.

TABLE 1. DEMOGRAPHIC OVERVIEW

Demographic Indicator	City of Spartanburg		Spartanburg County		Spartanburg Region				
	#	%	#	%	#	%			
Race/Ethnicity									
Non-Hispanic									
White	16,864	45.88%	160,502	74.34%	218,330	69.69%			
Black	17,375	47.27%	34,394	15.93%	67,137	21.43%			
Asian or Pacific Islander	625	1.70%	4,809	2.23%	5,839	1.86%			
Native American	63	0.17%	439	0.20%	625	0.20%			
Two or More Races	509	1.38%	2,720	1.26%	4,053	1.29%			
Other	42	0.11%	233	0.11%	344	0.11%			
Hispanic	1,277	3.47%	12,816	5.94%	16,940	5.41%			
National Origin									
#1 country of origin	Mexico	412	1.20%	Mexico	5,818	2.85%	Mexico	7,402	2.51%
#2 country of origin	Germany	121	0.35%	Ukraine	1,347	0.66%	Ukraine	1,387	0.47%
#3 country of origin	Philippines	103	0.30%	Laos	644	0.32%	India	790	0.27%
#4 country of origin	Korea	87	0.25%	India	526	0.26%	Laos	693	0.24%
#5 country of origin	Nepal	73	0.21%	Cambodia	478	0.23%	Germany	606	0.21%
#6 country of origin	Cuba	70	0.20%	Germany	424	0.21%	Cambodia	554	0.19%
#7 country of origin	Canada	68	0.20%	China excl. Hong Kong & Taiwan	386	0.19%	China excl. Hong Kong & Taiwan	427	0.14%
#8 country of origin	Colombia	43	0.12%	Russia	363	0.18%	Philippines	385	0.13%
#9 country of origin	Other UK	43	0.12%	Vietnam	311	0.15%	Russia	371	0.13%
#10 country of origin	England	41	0.12%	Belarus	282	0.14%	Canada	348	0.12%
Limited English Proficiency (LEP) Language									
#1 LEP Language	Spanish	361	1.05%	Spanish	5,758	2.82%	Spanish	7,561	2.56%
#2 LEP Language	Other Indic Language	104	0.30%	Other Slavic Language	761	0.37%	Other Slavic Language	791	0.27%
#3 LEP Language	Tagalog	58	0.17%	Russian	649	0.32%	Russian	676	0.23%
#4 LEP Language	Korean	54	0.16%	Laotian	373	0.18%	Laotian	373	0.13%

TABLE 1. DEMOGRAPHIC OVERVIEW (CONTINUED)

Demographic Indicator	City of Spartanburg		Spartanburg County		Spartanburg Region				
	#	%	#	%	#	%			
Limited English Proficiency (LEP) Language (continued)									
#5 LEP Language	Nepal	73	0.21%	Vietnamese	345	0.17%	Cambodian	367	0.12%
#6 LEP Language	Cuba	70	0.20%	Cambodian	330	0.16%	Vietnamese	345	0.12%
#7 LEP Language	Canada	68	0.20%	Chinese	295	0.14%	Chinese	319	0.11%
#8 LEP Language	Colombia	43	0.12%	German	182	0.09%	Hmong	230	0.08%
#9 LEP Language	Other UK	43	0.12%	Hmong	158	0.08%	German	205	0.07%
#10 LEP Language	England	41	0.12%	Gujarati	156	0.08%	Other Indic Language	196	0.07%
Disability Type									
Hearing difficulty		971	2.86%		7,996	3.99%		11,337	3.91%
Vision difficulty		1,064	3.13%		5,131	2.56%		8,132	2.80%
Cognitive difficulty		2,328	6.85%		11,982	5.97%		18,427	6.35%
Ambulatory difficulty		3,694	10.86%		17,394	8.67%		27,842	9.59%
Self-care difficulty		1,397	4.11%		6,174	3.08%		9,927	3.42%
Independent living difficulty		2,019	5.94%		11,841	5.90%		18,134	6.25%
Sex									
Male		16,292	44.32%		106,251	49.21%		151,549	48.38%
Female		20,464	55.68%		109,662	50.79%		161,719	51.62%
Age									
Under 18		8,358	22.74%		53,237	24.66%		76,050	24.28%
18-64		22,652	61.63%		134,804	62.43%		194,222	62.00%
65+		5,745	15.63%		27,872	12.91%		42,996	13.72%
Family Type									
Families with children		3,832	43.29%		25,145	43.26%		35,600	42.64%

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

Data Sources: Decennial Census; ACS

TABLE 2. DEMOGRAPHIC TRENDS

Demographic Indicator	City of Spartanburg					
	1990		2000		2010	
	#	%	#	%	#	%
Race/Ethnicity						
White, Non-Hispanic	24,570	55.59%	19,847	49.40%	16,864	45.88%
Black, Non-Hispanic	18,841	42.63%	18,760	46.70%	17,735	48.25%
Hispanic	322	0.73%	716	1.78%	1,277	3.47%
Asian or Pacific Islander, Non-Hispanic	371	0.84%	607	1.51%	697	1.90%
Native American, Non-Hispanic	42	0.10%	129	0.32%	131	0.36%
National Origin						
Foreign-born	964	2.18%	1,376	3.43%	1,415	3.85%
LEP						
Limited English proficiency	678	1.53%	1,052	2.62%	757	2.06%
Sex						
Male	19,799	44.82%	17,908	44.61%	16,292	44.32%
Female	24,380	55.18%	22,239	55.39%	20,464	55.68%
Age						
Under 18	10,721	24.27%	10,109	25.18%	8,358	22.74%
18-64	26,433	59.83%	23,560	58.68%	22,652	61.63%
65+	7,025	15.90%	6,477	16.13%	5,745	15.63%
Family Type						
Families with children	5,035	45.05%	3,066	46.98%	3,832	43.29%

TABLE 2. DEMOGRAPHIC TRENDS (CONTINUED)

Demographic Indicator	Spartanburg County					
	1990		2000		2010	
	#	%	#	%	#	%
Race/Ethnicity						
White, Non-Hispanic	129,651	84.16%	145,384	79.39%	160,502	74.34%
Black, Non-Hispanic	21,881	14.20%	28,000	15.29%	35,920	16.64%
Hispanic	994	0.65%	5,248	2.87%	12,816	5.94%
Asian or Pacific Islander, Non-Hispanic	1,180	0.77%	3,320	1.81%	5,362	2.48%
Native American, Non-Hispanic	199	0.13%	764	0.42%	1,033	0.48%
National Origin						
Foreign-born	2,382	1.55%	6,977	3.81%	12,539	5.81%
LEP						
Limited English proficiency	1,717	1.12%	4,984	2.72%	8,407	3.89%
Sex						
Male	75,821	49.24%	90,429	49.38%	106,251	49.21%
Female	78,149	50.76%	92,710	50.62%	109,662	50.79%
Age						
Under 18	37,867	24.59%	46,641	25.47%	53,237	24.66%
18-64	98,654	64.07%	115,396	63.01%	134,804	62.43%
65+	17,449	11.33%	21,102	11.52%	27,872	12.91%
Family Type						
Families with children	19,914	45.54%	12,502	45.04%	25,145	43.26%

TABLE 2. DEMOGRAPHIC TRENDS (CONTINUED)

Demographic Indicator	Spartanburg Region					
	1990		2000		2010	
	#	%	#	%	#	%
Race/Ethnicity						
White, Non-Hispanic	197,667	76.86%	207,880	73.28%	218,330	69.69%
Black, Non-Hispanic	55,770	21.69%	62,660	22.09%	69,577	22.21%
Hispanic	1,547	0.60%	7,252	2.56%	16,940	5.41%
Asian or Pacific Islander, Non-Hispanic	1,626	0.63%	4,194	1.48%	6,549	2.09%
Native American, Non-Hispanic	301	0.12%	1,095	0.39%	1,460	0.47%
National Origin						
Foreign-born	3,601	1.40%	9,583	3.38%	15,956	5.09%
LEP						
Limited English proficiency	2,740	1.07%	7,169	2.53%	10,910	3.48%
Sex						
Male	123,179	47.90%	137,045	48.31%	151,549	48.38%
Female	133,958	52.10%	146,627	51.69%	161,719	51.62%
Age						
Under 18	63,361	24.64%	72,082	25.41%	76,050	24.28%
18-64	160,594	62.45%	175,105	61.73%	194,222	62.00%
65+	33,182	12.90%	36,485	12.86%	42,996	13.72%
Family Type						
Families with children	32,446	45.30%	20,861	44.75%	35,600	42.64%

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

Data Sources: Decennial Census; ACS

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

HUD developed a methodology that combines demographic and economic indicators to identify areas it classifies as racially and ethnically concentrated areas of poverty (RECAPs). HUD defines a RECAP as a census tract that has a family poverty rate of 40% or more (or a family poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more.

There are six RECAP tracts in the Spartanburg region, as shown on the maps that follow. Five of the RECAP tracts are found concentrated in the western half of the City of Spartanburg. One RECAP tract is located between Interstate 85 and Interstate 85 Business in close proximity to the City of Spartanburg in Spartanburg County. These RECAP tracts align with input received from community stakeholders, which indicated that large shares of Spartanburg's African American population lives on the west side of the city.

To examine whether there are other areas in Spartanburg County where people of color make up more than half of the population and poverty rates are high, Figure 3 uses census block groups rather than tracts to analyze racial and ethnic concentrations of poverty. Even relying on smaller geographies, additional R/ECAPs are not apparent in Spartanburg County, other than a small area on its western border in Greer. All of the RECAP block groups are part of one of the RECAP tracts shown in one of the first two maps.

FIGURE 1. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY IN THE CITY OF SPARTANBURG, 2010

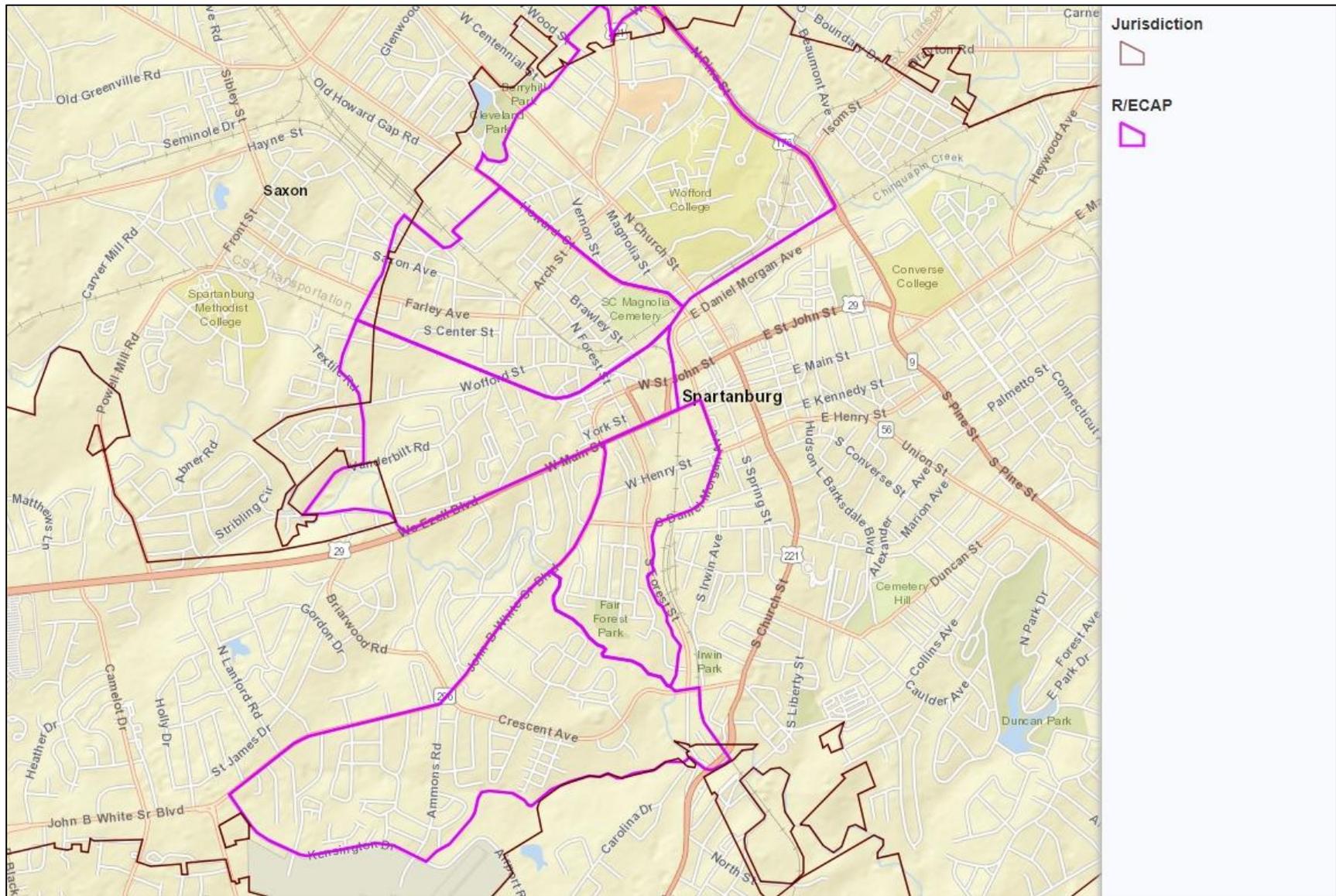


FIGURE 2. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY IN THE CITY OF SPARTANBURG, 2010

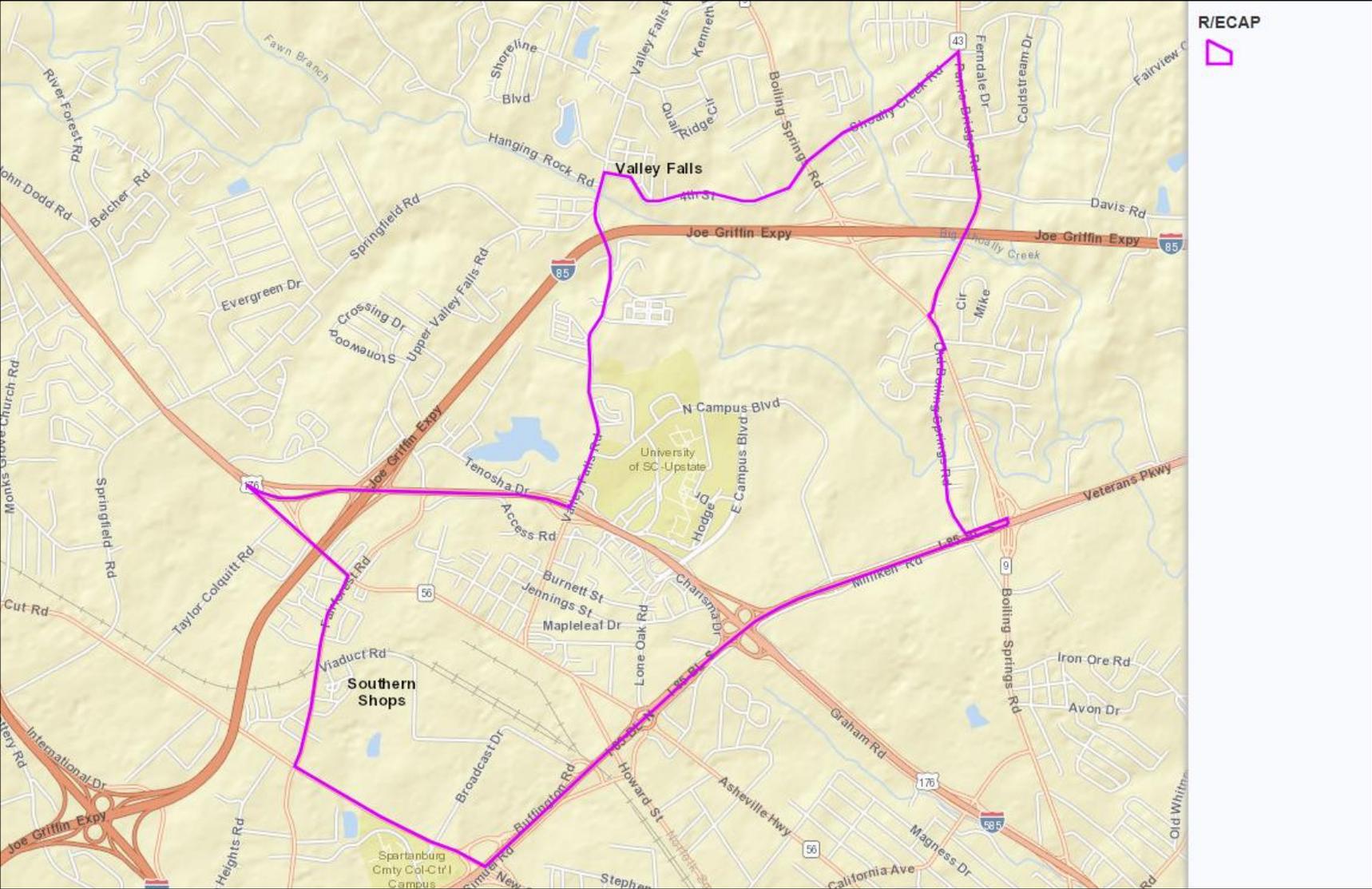
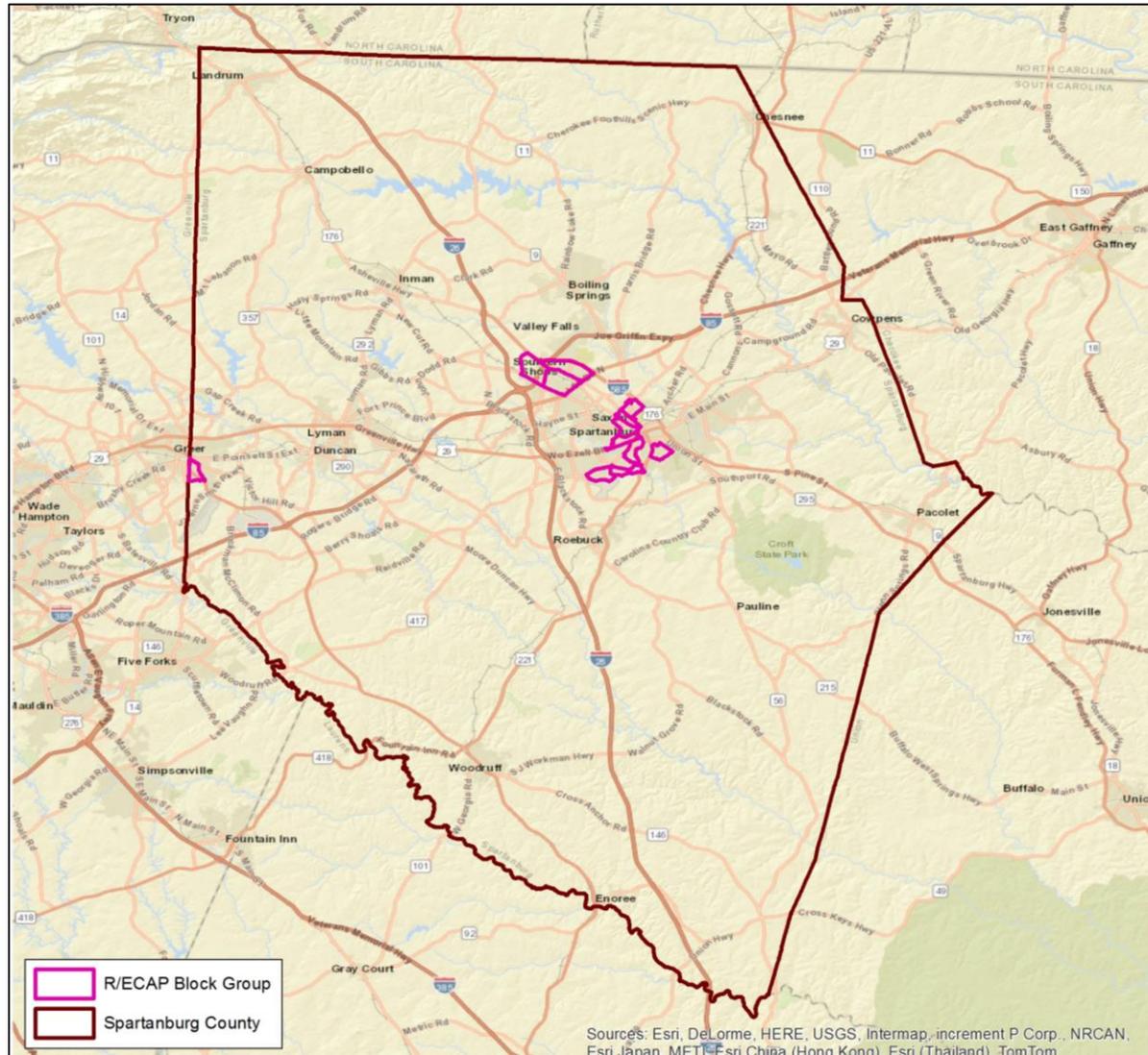


FIGURE 3. RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY BY BLOCK GROUP IN SPARTANBURG COUNTY, 2012-2016



CHAPTER 4.

SEGREGATION & INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁴

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

The strong correlation between population density and racial composition of neighborhoods reveals the spatial segregation that exists between racial groups in the City of Spartanburg. The most densely populated neighborhoods in the City of Spartanburg are located in the southwestern half of the city. These densely populated areas in southwest Spartanburg are racially homogeneous and predominantly Black. Neighborhoods in the northeastern half of the city are noticeably less dense and the majority of the population is white. White and Black communities are roughly segregated along US 176 as it diagonally bisects the city with one exception. The neighborhood between W.O. Ezell Boulevard and John B. White Sr. Boulevard deviates from the characteristics of the surrounding areas and is less dense and predominantly white. There has been an overall decrease in population density due to population loss in the past 20 years, but the current spatial distribution and segregation of the city's population have remained largely the same.

The population of Spartanburg County outside of Spartanburg is less diverse when compared to the City of Spartanburg. Although nearly 75% of Spartanburg County's population is white, there is a larger presence of minority groups than in the city. The Hispanic, Asian or Pacific Islander, and Native American populations live in close proximity to the city and are concentrated mostly in the northwest suburbs of the city. The white population is evenly distributed throughout the Spartanburg County with higher concentrations residing in the northern half of the county.

⁴ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Between 1990 and 2010, some minor geographical shifts occurred among racial and ethnic minority groups. Migration patterns between 1990 and 2010 show the black population started to move out of the City of Spartanburg and into the northern suburbs in Spartanburg County. Coinciding with this movement, the white population also started to migrate further north of the city to more concentrated locations. Changes in the racial and ethnic composition of neighborhoods in Spartanburg County increase the level of integration, but these patterns could also indicate increasing levels of segregation in the county as the rapid growth of one group often results in an outmigration of another group.

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FIGURE 4. POPULATION BY RACE AND ETHNICITY IN THE CITY OF SPARTANBURG, 2010

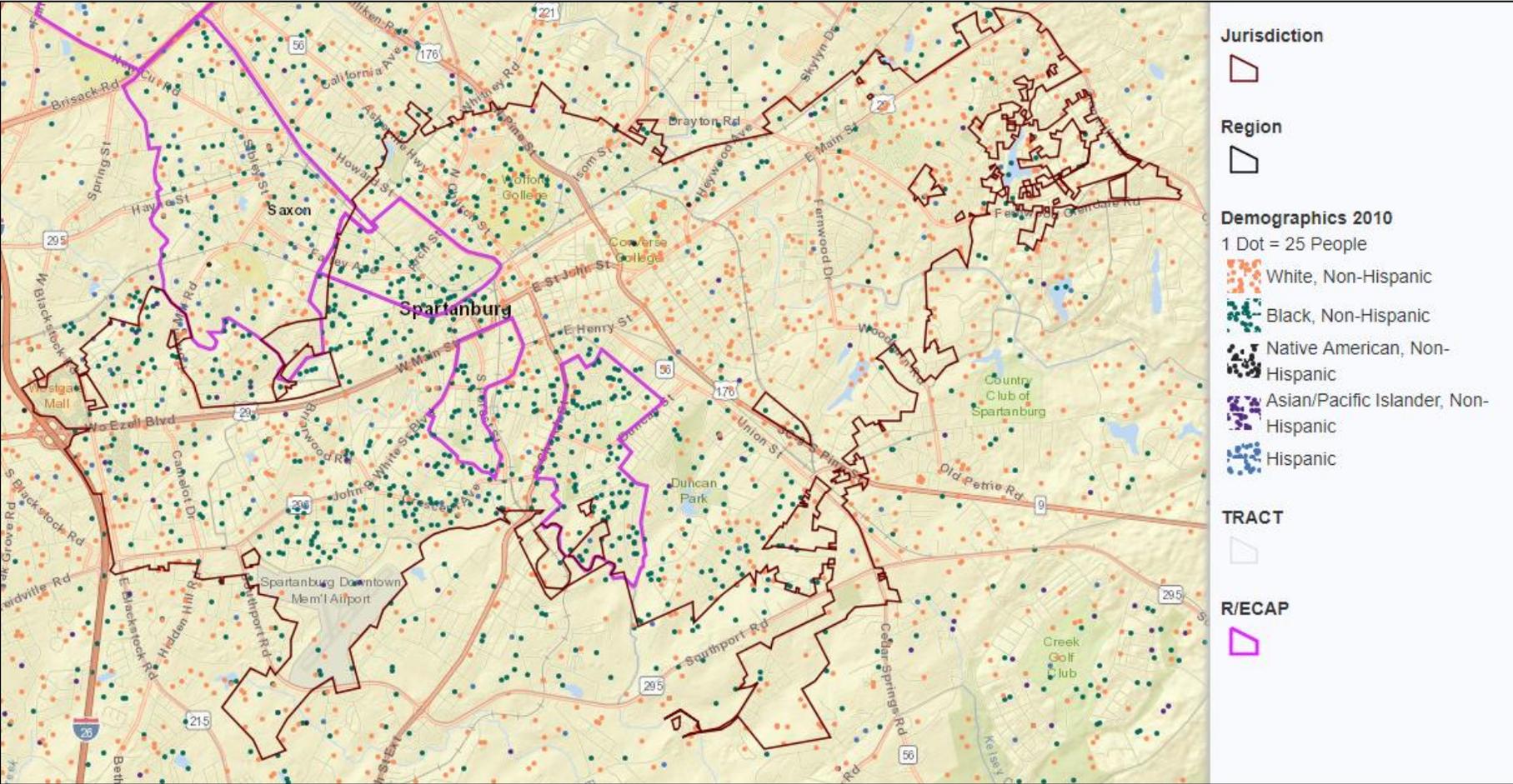


FIGURE 5. POPULATION BY RACE AND ETHNICITY IN THE CITY OF SPARTANBURG, 2000

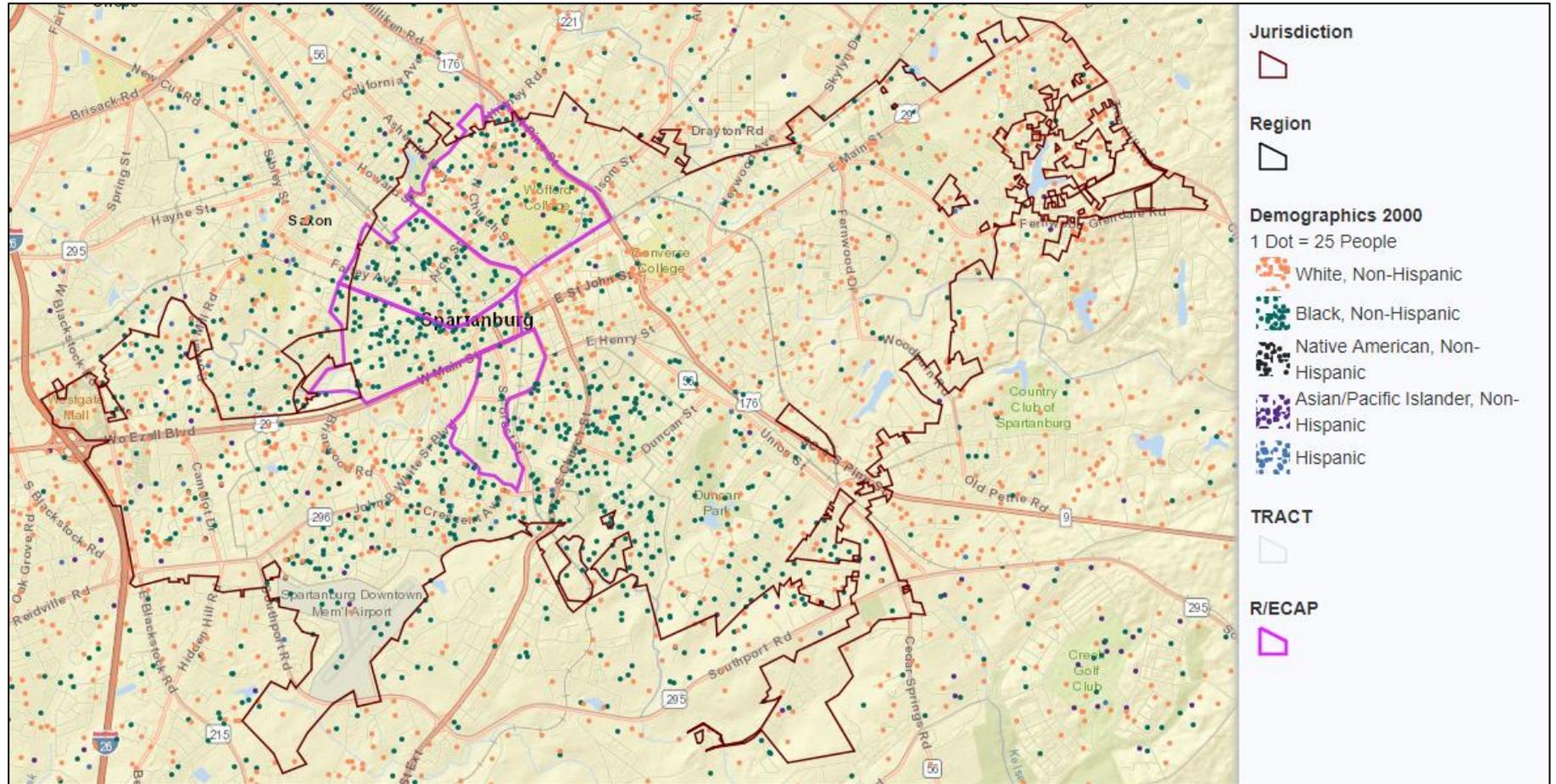


FIGURE 6. POPULATION BY RACE AND ETHNICITY IN THE CITY OF SPARTANBURG, 1990

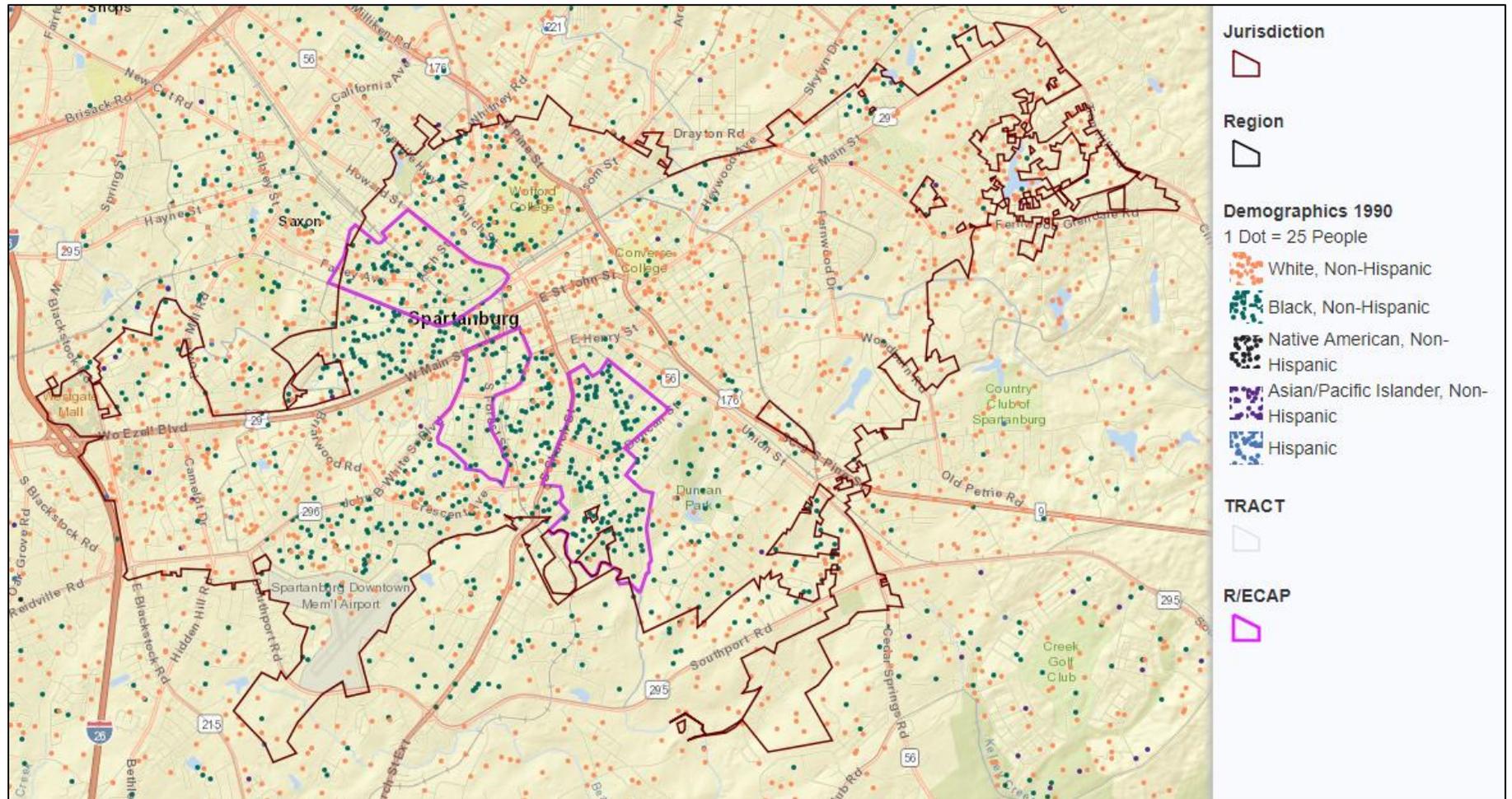


FIGURE 7. POPULATION BY RACE AND ETHNICITY IN SPARTANBURG COUNTY, 2010

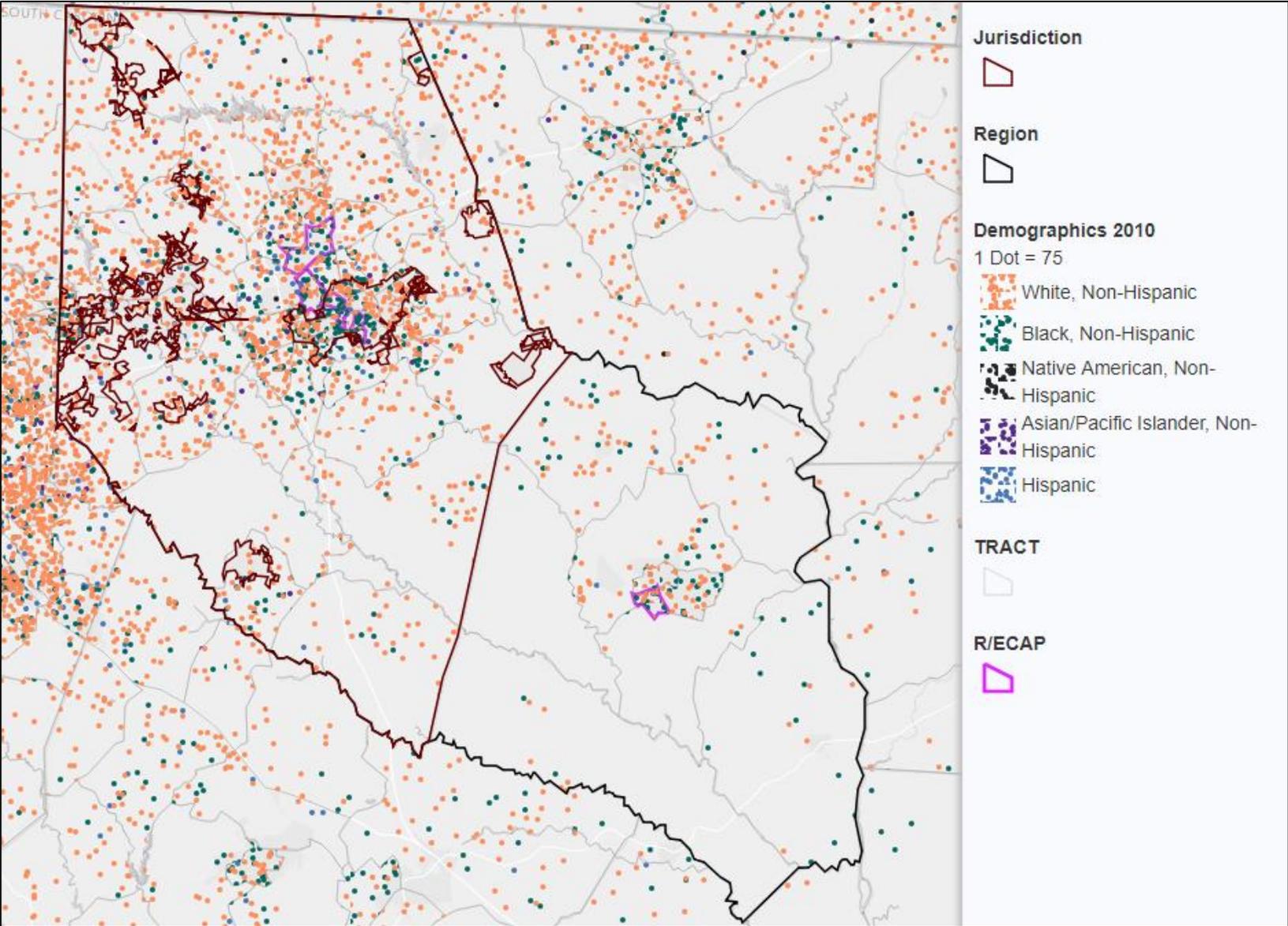


FIGURE 8. POPULATION BY RACE AND ETHNICITY IN SPARTANBURG COUNTY, 2000

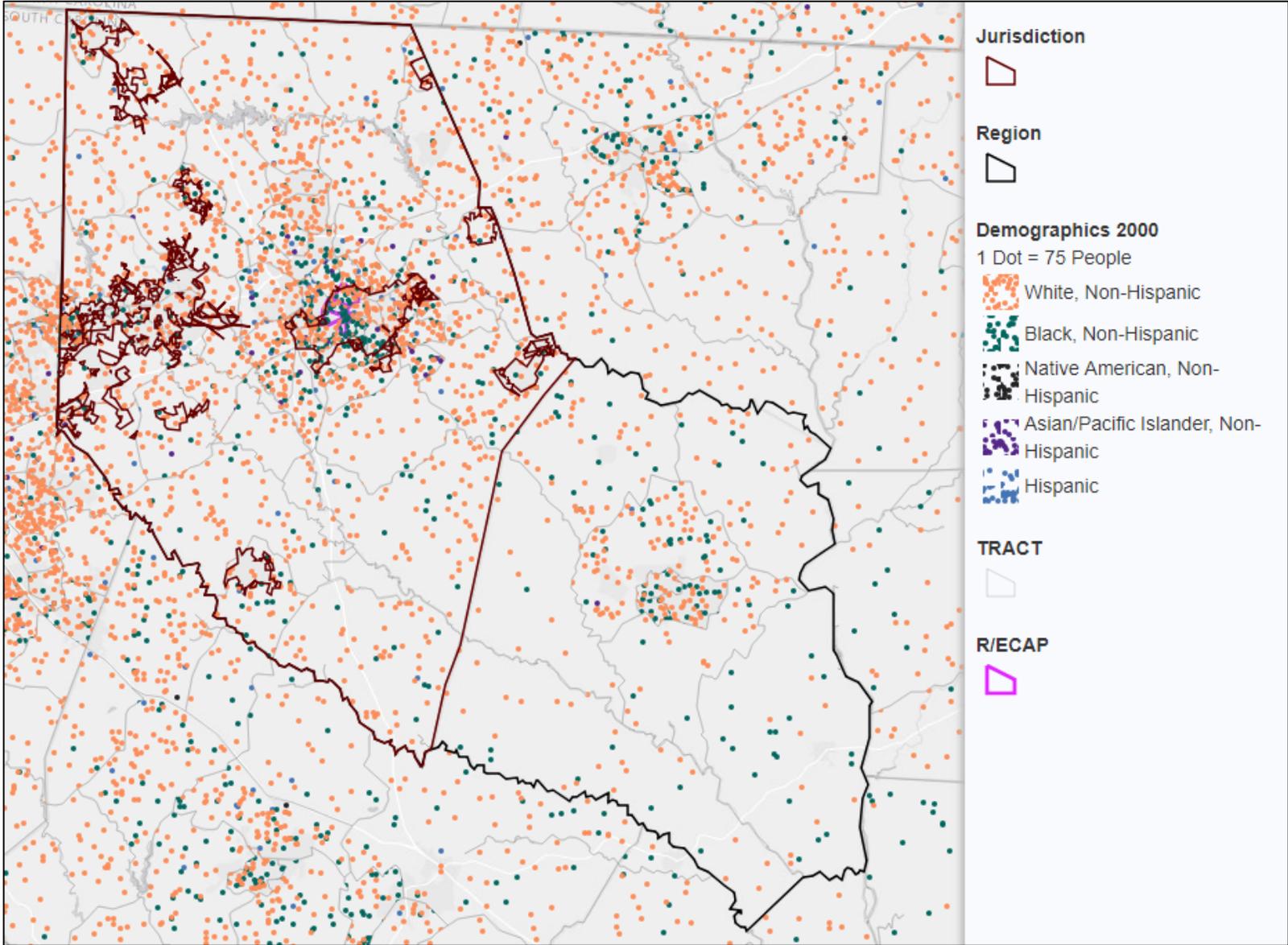
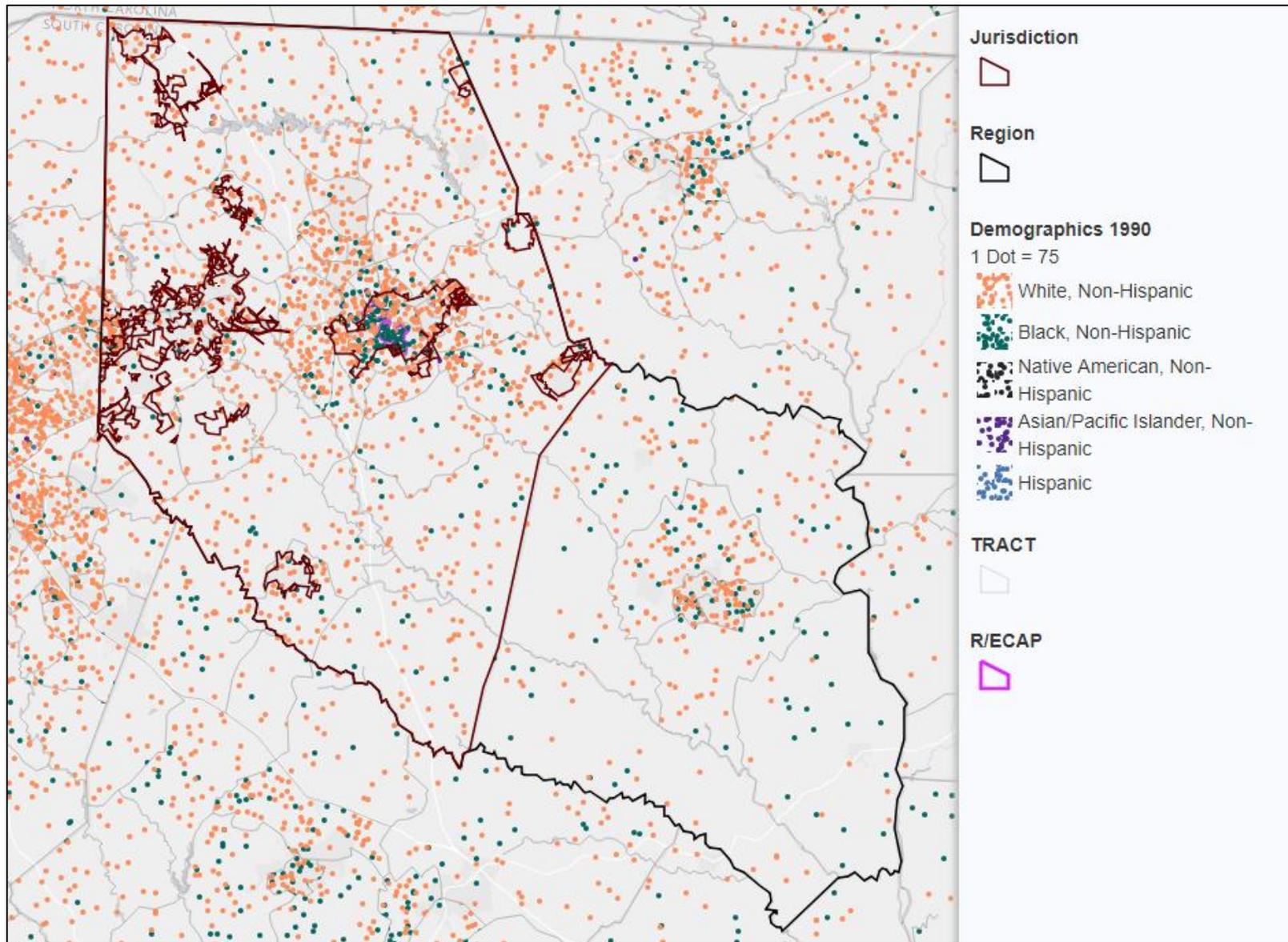


FIGURE 9. POPULATION BY RACE AND ETHNICITY IN SPARTANBURG COUNTY, 1990



SEGREGATION LEVELS

In addition to visualizing the racial and ethnic composition of the City of Spartanburg and Spartanburg County with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

The table below shares the dissimilarity indices for four pairings in the City of Spartanburg, Spartanburg County and the Spartanburg region (Spartanburg County and Union County). This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The “current” figure is calculated using block groups. Because block groups are typically smaller geographies, they measure segregation at a finer grain than analyses that use census tracts and, as a result, often indicate slightly higher levels of segregation than tract-level calculations. This assessment begins with a discussion of segregation at the tract-level from 1990 through 2010, and then examines the “current” figures calculated using block groups.

In the City of Spartanburg, the DI for two pairings in 2010 show moderate levels of segregation between non-white/white (48.3) and Black/white (50.9). Both DI values are less than the DI values calculated in 1990 for the same pairings. The Hispanic/white DI in 2010 was 33.4 and still considered low, but an increase from 20.9 in 1990. The DI of 34.7 for Asian and white residents is a substantial decrease from a DI of 44.2 in 2000 which indicates moderate levels of segregation in 2000 between the two groups.

In 2010, the DI for all pairings except for the Hispanic/white pairing indicated lower levels of segregation in Spartanburg County compared to the City of Spartanburg. The DI of 36.9 for Hispanic and white populations was slightly higher than the 33.4 in the City of Spartanburg. The DI for most pairings in the county increased between 1990 and 2010 except for the DI for Asian and white residents. The DI of 47.1 in 1990 indicated moderate levels of segregation between Asian and white residents when all other DI values for other pairings were under 30.

TABLE 3. RACIAL / ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	City of Spartanburg				Spartanburg County				Spartanburg Region			
	Trends			Current (2010)	Trends			Current (2010)	Trends			Current (2010)
	1990	2000	2010		1990	2000	2010		1990	2000	2010	
Non-White/White	51.1	48.4	48.3	54.8	27.9	28.6	32.2	37.8	38.0	35.1	36.3	42.2
Black/White	53.1	50.8	50.9	57.8	29.1	28.8	34.8	41.5	39.5	37.8	40.4	47.1
Hispanic/White	20.9	32.9	33.4	39.3	21.3	36.9	36.9	41.0	25.2	36.9	38.3	42.4
Asian or Pacific Islander/White	36.7	44.2	34.7	45.0	47.1	37.3	32.7	39.5	49.0	40.1	35.2	41.9

Data Sources: Decennial Census

The “current” DI figures calculated for the City of Spartanburg indicate high levels of segregation between white and black residents. The non-white/white DI was the second highest in the city and at 54.8 indicates borderline high levels of segregation. The DI of 45 for Asian or Pacific Islander and white indicate moderate levels of segregation between the two groups. The lowest DI value of 39.3 was calculated for white and Hispanic. Since 1990, there were some decreases in DI value on the tract level but all pairings on the block group level are experiencing increased levels of segregation in the City of Spartanburg.

The DI for non-white/white (37.8) and white/Black (41.5) are substantially lower in Spartanburg County. The DI of 39.5 for Asian/white is also much lower in Spartanburg County. These DI values suggest there are low levels of segregation in Spartanburg County. One pairing indicates a higher level of segregation between Hispanic and white with a DI of 41.0.

Overall, the Dissimilarity Index indicates moderate to high levels of segregation throughout the City of Spartanburg, Spartanburg County, and the region.

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁵ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁶

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

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

Most of the foreign-born residents in the City of Spartanburg are located in the southwestern half of the city. The neighborhood around Fairfield Park contain a heavy concentration of foreign-born residents from Mexico and immediately south is a small concentration of residents with origins in Korea. Foreign-born residents originating from Germany mostly reside in the neighborhood north of the airport or near Duncan Park. The westernmost area in the city house most of the foreign-born population originating from Nepal and the Philippines.

There are several concentrations of foreign-born populations outside the City of Spartanburg. Foreign-born residents from Mexico are heavily concentrated in the northwest suburbs of the city. Groups originating from India and Ukraine reside further north in Spartanburg County. In the southeast suburbs of the city, there is a dense concentration of foreign-born residents originating from Laos. There are also isolated concentrations of residents from Mexico, Ukraine, and India on the western side of Spartanburg County further away from the city.

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

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

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

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

The geographic distribution of residents with limited English proficiency (LEP) coincide with the locations of the foreign-born population. The Spanish-speaking LEP population are concentrated in the northwest suburbs closest to the City of Spartanburg. LEP populations that speak Russian or Slavic languages are less concentrated but generally reside in the northwest quadrant of Spartanburg County. The Laotian-speaking residents are concentrated in the southeast suburbs of the city.

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FIGURE 10. FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITY OF SPARTANBURG

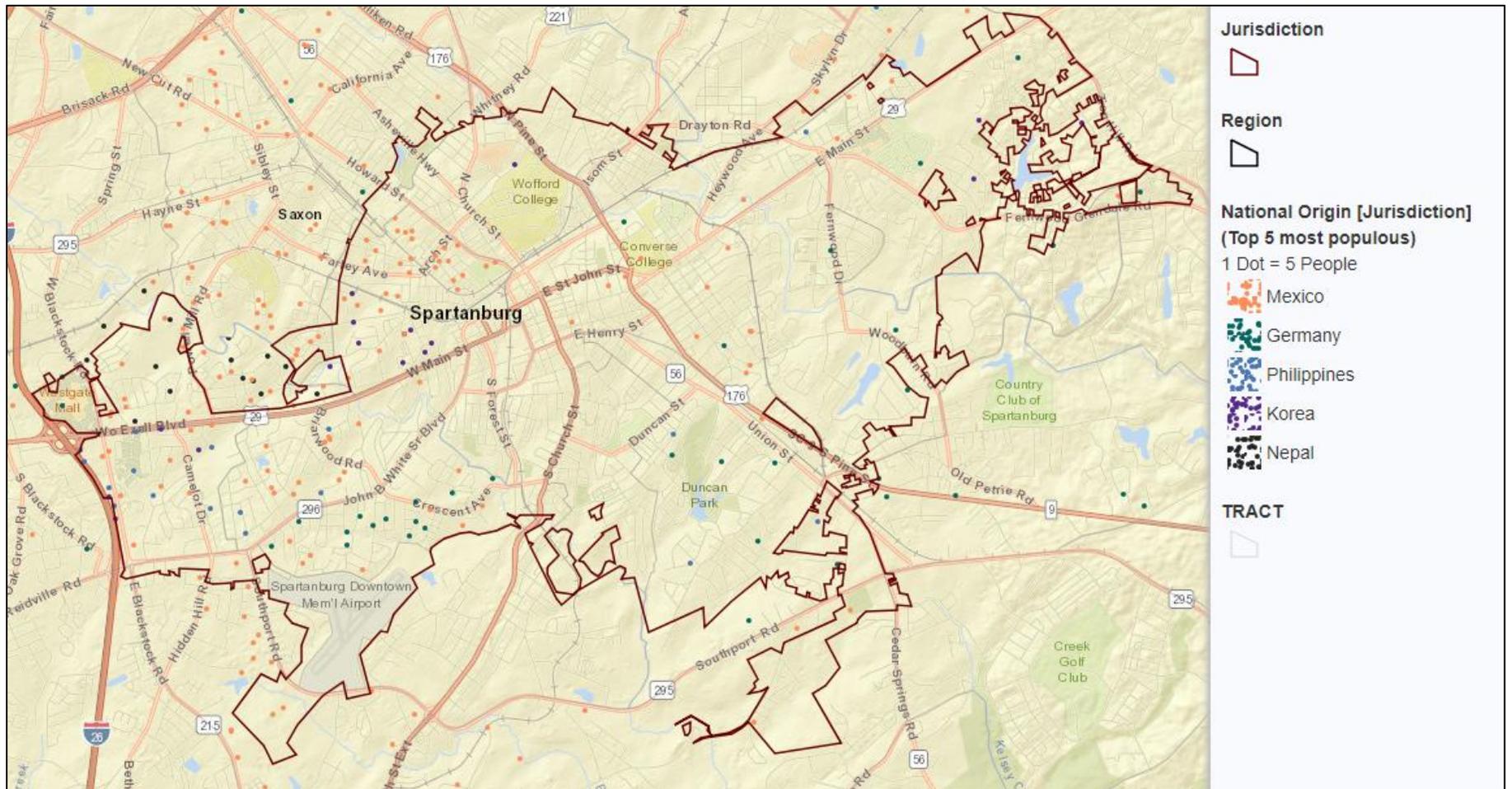


FIGURE 11. FOREIGN-BORN POPULATION BY NATIONALITY IN SPARTANBURG COUNTY

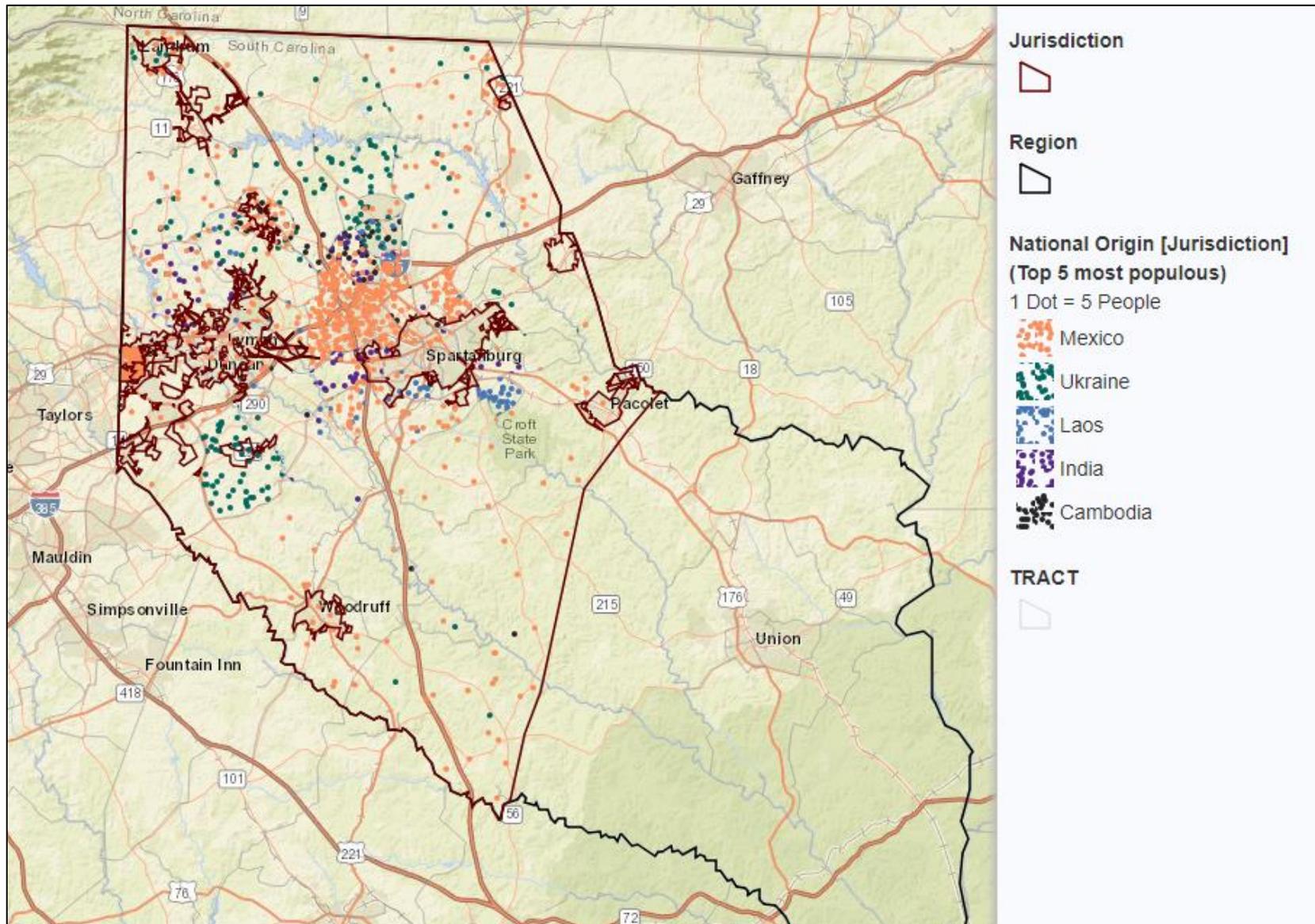


FIGURE 12. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITY OF SPARTANBURG

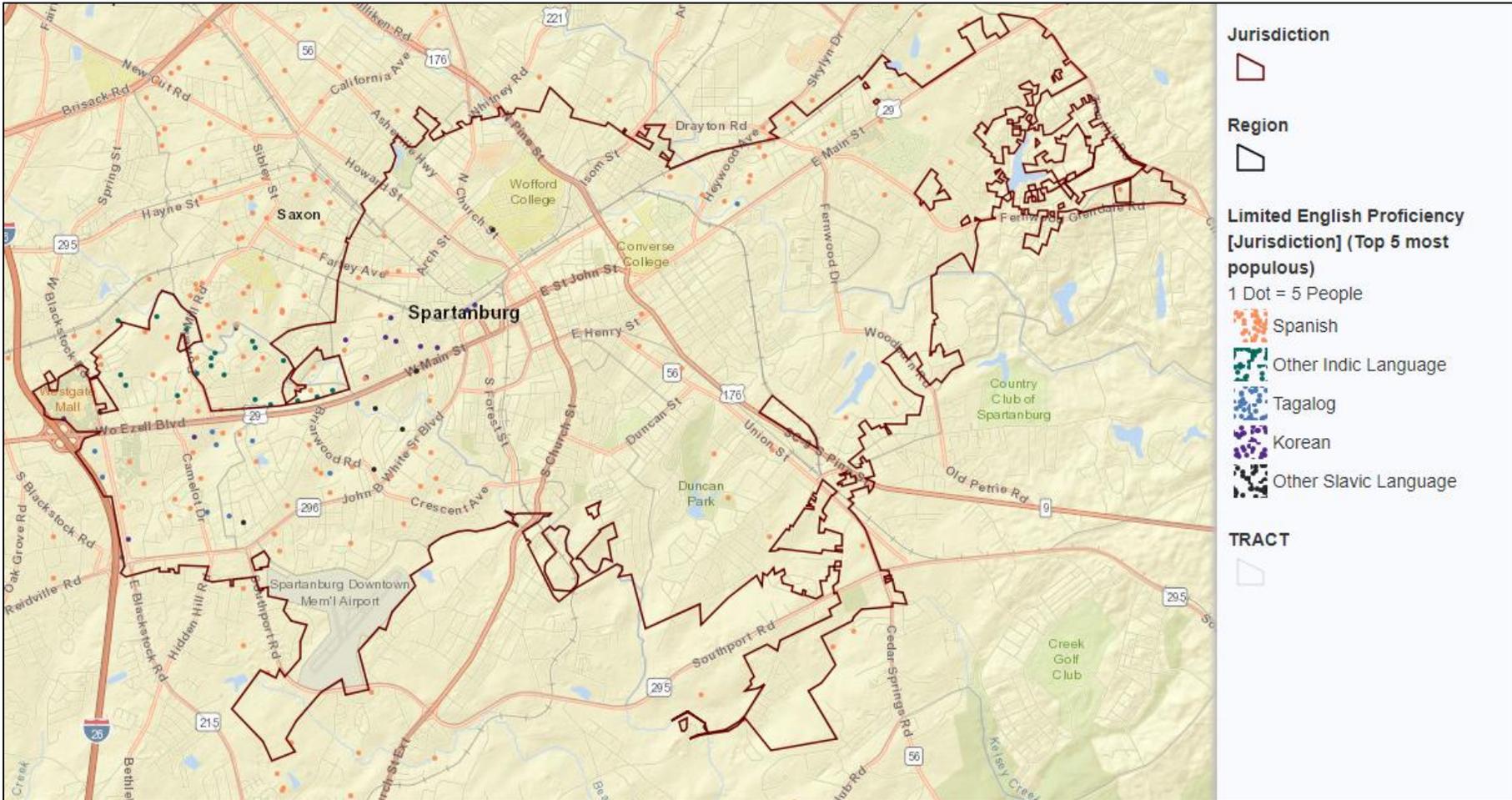
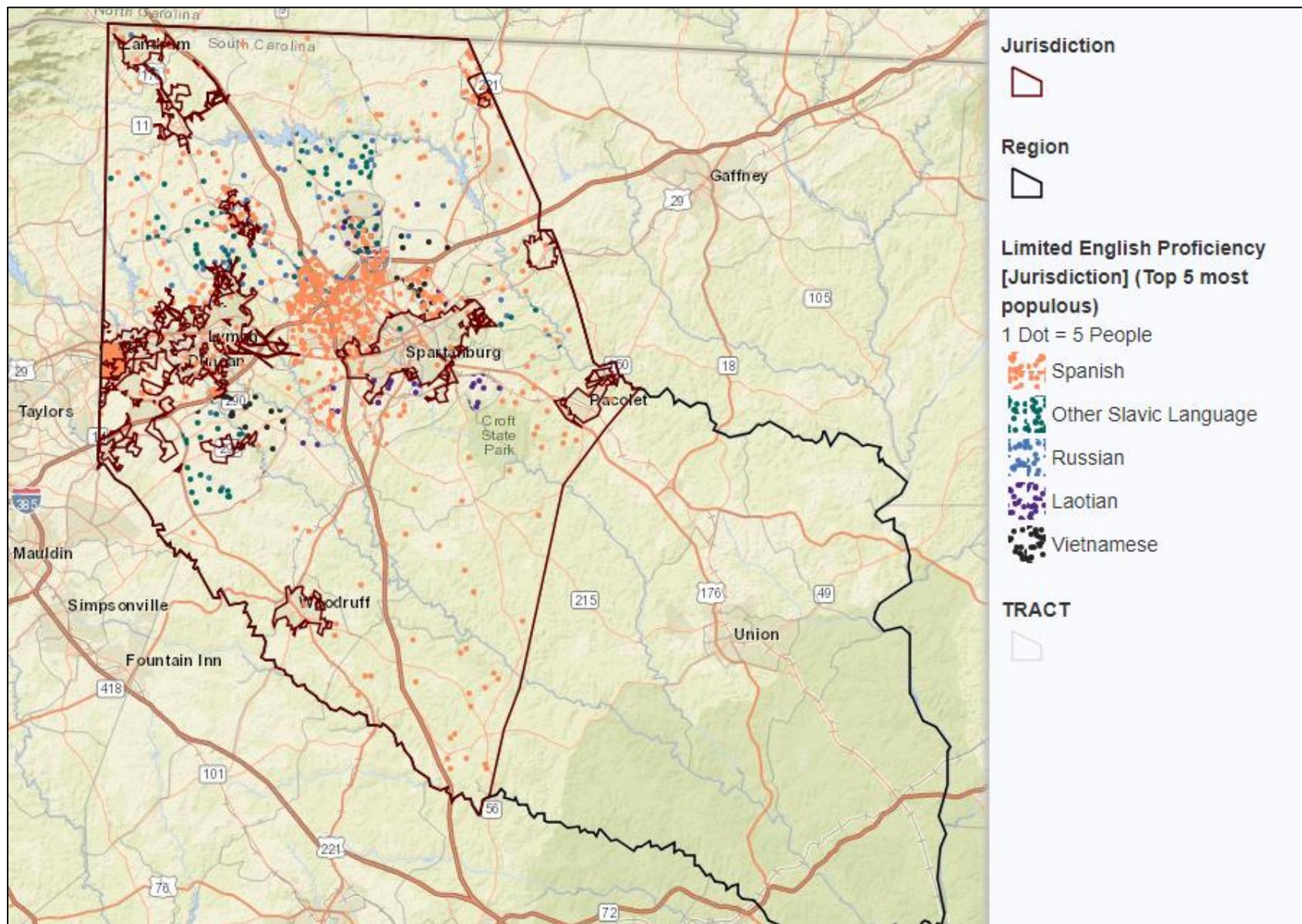


FIGURE 13. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN SPARTANBURG COUNTY



FAMILIES WITH CHILDREN

The residential pattern of families with children is relatively uniform throughout the City of Spartanburg. Between 20.1% to 80% of families have children throughout neighborhoods in the city. Areas southwest of US 176 are more likely to have neighborhoods that house families with children. There are small pockets of neighborhoods dispersed throughout the city where 20.1% through 40% of the families have children, thus these neighborhoods are less likely than other areas to have families with children.

Families in the City of Spartanburg are less likely to have children compared to the families that reside in Spartanburg County. There are more families with children residing in areas of Spartanburg County that are north of the city.

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FIGURE 14. SHARE OF HOUSEHOLDS THAT ARE FAMILIES WITH CHILDREN IN THE CITY OF SPARTANBURG

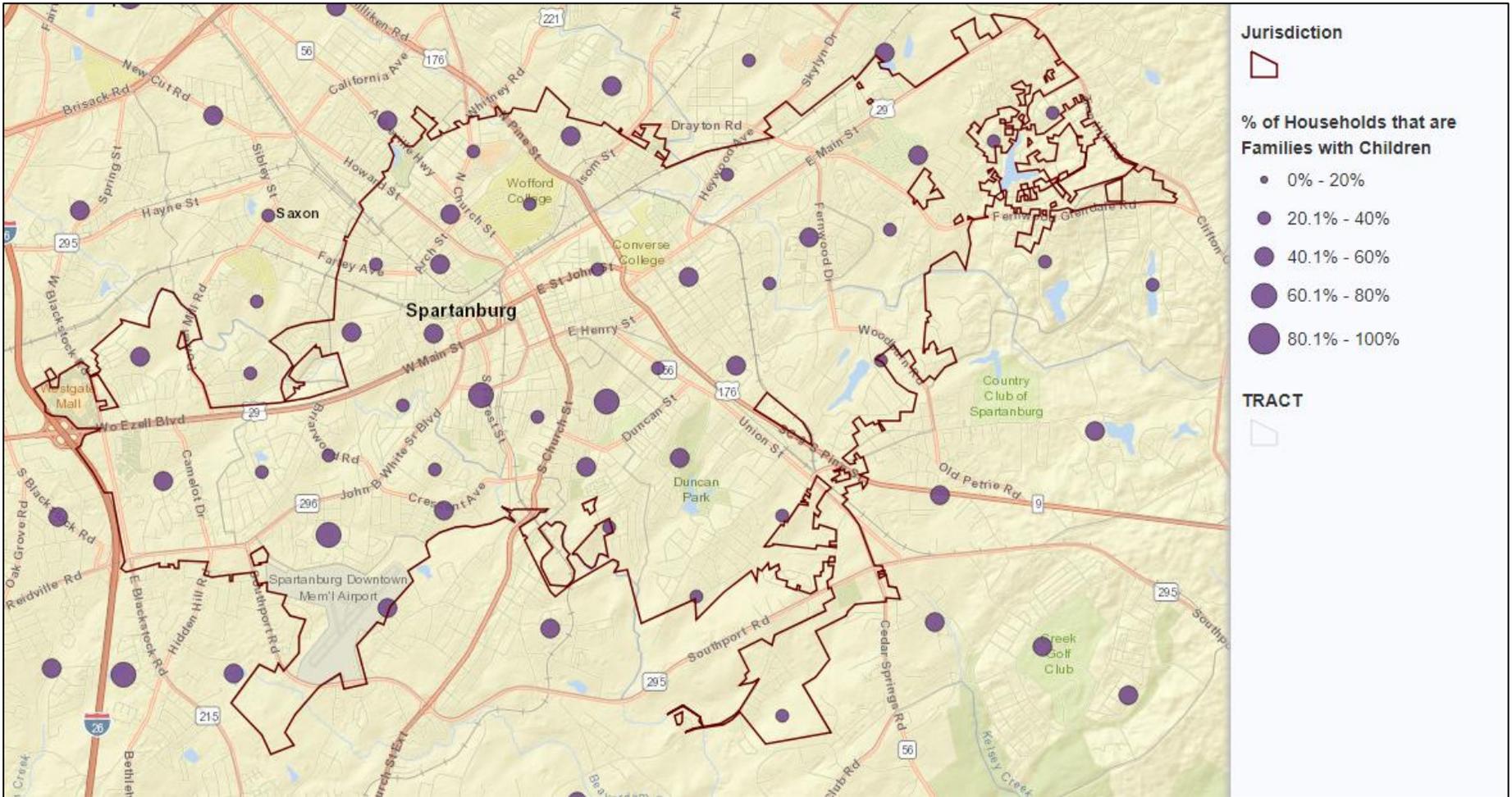
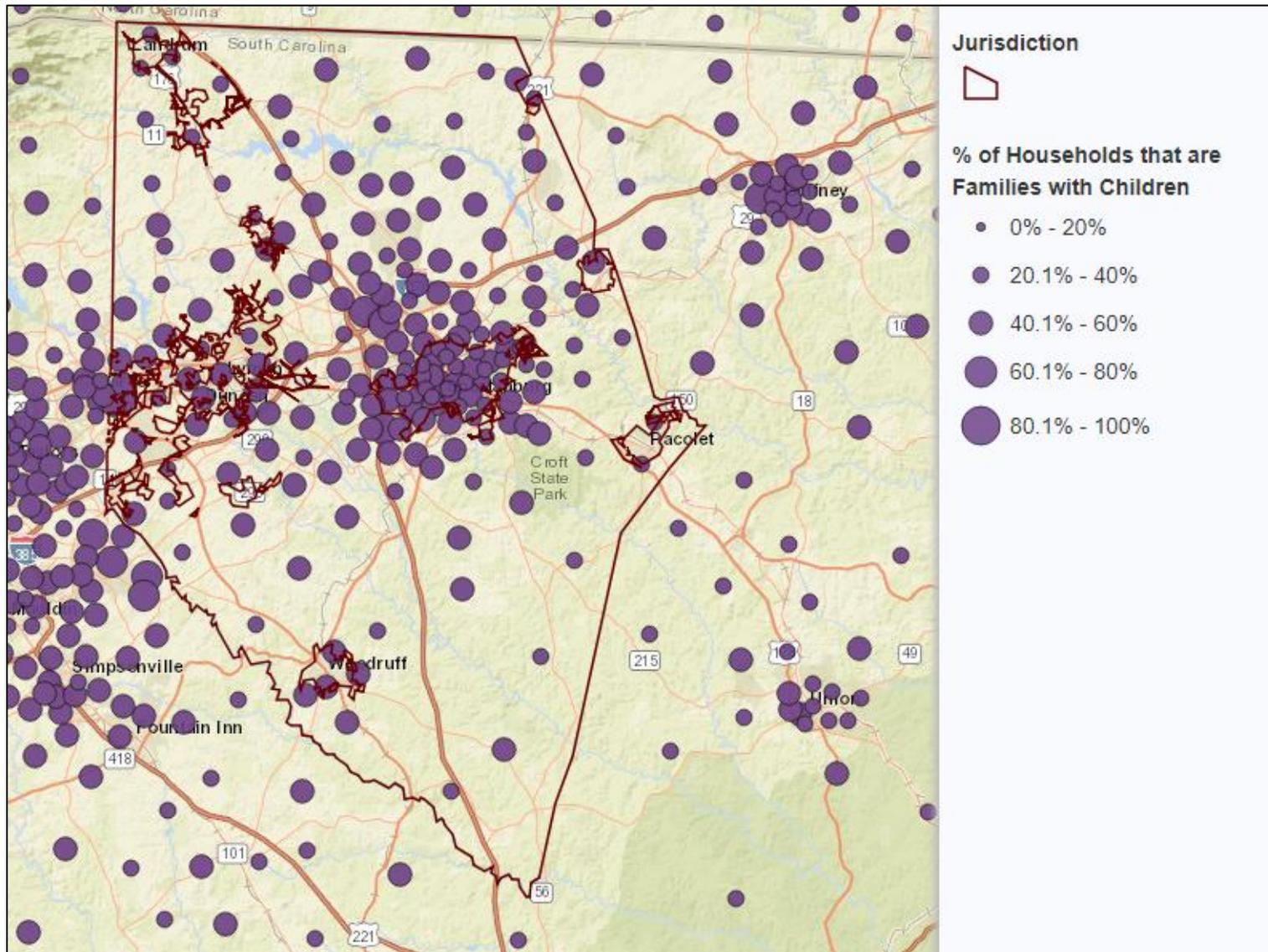


FIGURE 15. SHARE OF HOUSEHOLDS THAT ARE FAMILIES WITH CHILDREN IN SPARTANBURG COUNTY



CHAPTER 5.

ACCESS TO OPPORTUNITY

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

Average index values by race and ethnicity for the city and region are provided in Table 4 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the white non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the white non-Hispanic group. A positive score indicates that the subgroup has a higher score than the white non-Hispanic Group.

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of Spartanburg – Total Population									
School Proficiency Index	53	40	43	46	44	-13	-10	-7	-9
Jobs Proximity Index	70	53	69	55	67	-17	-1	-15	-3
Labor Market Engagement Index	53	25	43	35	36	-28	-10	-18	-17
Transit Index	57	67	55	61	60	10	-2	4	3
Low Transportation Cost Index	32	36	33	34	34	4	1	2	2
Low Poverty Index	43	22	42	29	34	-21	-1	-14	-9
Environmental Health Index	22	20	21	22	20	-2	-1	0	-2
City of Spartanburg – Population Below Federal Poverty Line									
School Proficiency Index	46	38	54	55	42	-8	8	9	-4
Jobs Proximity Index	61	54	82	54	62	-7	21	-7	1
Labor Market Engagement Index	39	16	50	73	43	-23	11	34	4
Transit Index	59	73	43	56	61	14	-16	-3	2
Low Transportation Cost Index	33	39	33	28	33	6	0	-5	0
Low Poverty Index	34	13	49	57	31	-21	15	23	-3
Environmental Health Index	23	19	17	35	23	-4	-6	12	0

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
Spartanburg County – Total Population									
School Proficiency Index	67	54	62	63	53	-13	-5	-4	-14
Jobs Proximity Index	44	53	51	46	54	9	7	2	10
Labor Market Engagement Index	43	36	49	39	35	-7	6	-4	-8
Transit Index	32	40	36	35	41	8	4	3	9
Low Transportation Cost Index	15	21	19	17	22	6	4	2	7
Low Poverty Index	48	38	50	44	35	-10	2	-4	-13
Environmental Health Index	45	36	39	42	37	-9	-6	-3	-8
Spartanburg County– Population Below Federal Poverty Line									
School Proficiency Index	63	54	65	54	41	-9	2	-9	-22
Jobs Proximity Index	45	51	53	56	63	6	8	11	18
Labor Market Engagement Index	37	31	42	54	23	-6	5	17	-14
Transit Index	34	44	40	48	52	10	6	14	18
Low Transportation Cost Index	16	22	17	25	27	6	1	9	11
Low Poverty Index	40	32	35	50	21	-8	-5	10	-19
Environmental Health Index	44	36	40	35	32	-8	-4	-9	-12

TABLE 4. DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
Spartanburg Region – Total Population									
School Proficiency Index	62	47	60	57	55	-15	-2	-5	-7
Jobs Proximity Index	46	53	53	47	54	7	7	1	8
Labor Market Index	40	29	47	35	33	-11	7	-5	-7
Transit Trips Index	30	42	37	33	42	12	7	3	12
Low Transportation Cost Index	15	23	20	17	23	8	5	2	8
Low Poverty Index	44	31	48	40	33	-13	4	-4	-11
Environmental Health Index	43	33	37	41	36	-10	-6	-2	-7
Spartanburg Region – Population Below Federal Poverty Line									
School Proficiency Index	58	46	64	42	45	-12	6	-16	-13
Jobs Proximity Index	45	51	56	46	60	6	11	1	15
Labor Market Index	33	22	40	48	23	-11	7	15	-10
Transit Trips Index	30	47	40	35	48	17	10	5	18
Low Transportation Cost Index	15	26	19	18	26	11	4	3	11
Low Poverty Index	37	23	34	51	21	-14	-3	14	-16
Environmental Health Index	44	31	37	42	33	-13	-7	-2	-11

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

EDUCATION

This school proficiency index is calculated based on performance of 4th grade students on state exams. It relies on attendance zones, if available, and otherwise calculates proficiency based on the performance of elementary schools within 1.5 miles of a block group's residents.

The maps on the following pages shows HUD-provided opportunity scores related to education for the City of Spartanburg and Spartanburg County's block groups, along with the demographic indicators of race/ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Many block groups in the City of Spartanburg have similar levels of access to proficient schools. However, there are several block groups throughout the city that have very high or very low levels of access. Figure 16 shows one block group on the eastern border that extends outside city limits to have the best access to proficient schools. The block groups with very low access to proficient schools are mostly concentrated in the southwestern half of the city. Block groups in central neighborhoods and the northeast corner of the city have moderate levels of access to proficient schools.

Figure 16 shows a strong correlation between access to proficient schools and race in the City of Spartanburg. Black populations are concentrated in block groups that have low levels of access in the southwest section of the city. White populations are generally concentrated in the northeast half of the city where school proficiency index scores for all block groups are above 50. There are block groups in the city center that are predominantly Black and have moderate access to proficient schools; however, Highway 176 and East Henry Street form a boundary between block groups that are predominantly white or Black.

Table 4 shows the disparity in opportunities for each racial and ethnic group to access proficient schools in the City of Spartanburg. All minority groups have less access to proficient schools when compared to the white population. Black populations have the least access to proficient schools and experience the greatest disparity compared to Asian, Native American, or Hispanic populations. White, Black and Hispanic populations below the federal poverty line have less access to proficient schools. There is less disparity among these three groups because of the significant difference in access among the white population. In contrast, Asian and Native American groups below the poverty line have increased access to proficient schools.

Spatial and demographic patterns found in the City of Spartanburg are reflected in Spartanburg County. Block groups in the northeast corner of the county generally have the best access to proficient schools. The population in these block groups are majority white by a wide margin. The southern region of the county has good access to proficient schools and is also predominantly white. Block groups in the immediate vicinity of the City of Spartanburg generally have the least access to proficient schools in the county and are more diverse with higher proportions of Black, Hispanic, and Asian populations. Small concentrations of Asian populations are found in block groups that have better access to proficient schools west and further north of the city.

Residents in Spartanburg County have higher levels of access to proficient schools compared to the City of Spartanburg. Minority groups in Spartanburg County, similar to the city, have less access to proficient schools compared to the white population. The Black and Hispanic populations in Spartanburg County have the least access to proficient schools. All population groups below the federal poverty line, with the exception of the Hispanic population, have increased access to proficient schools. The disparity between the white and the Hispanic population below the poverty line is the largest among any two groups in the county and city.

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FIGURE 16. SCHOOL PROFICIENCY INDEX IN THE CITY OF SPARTANBURG

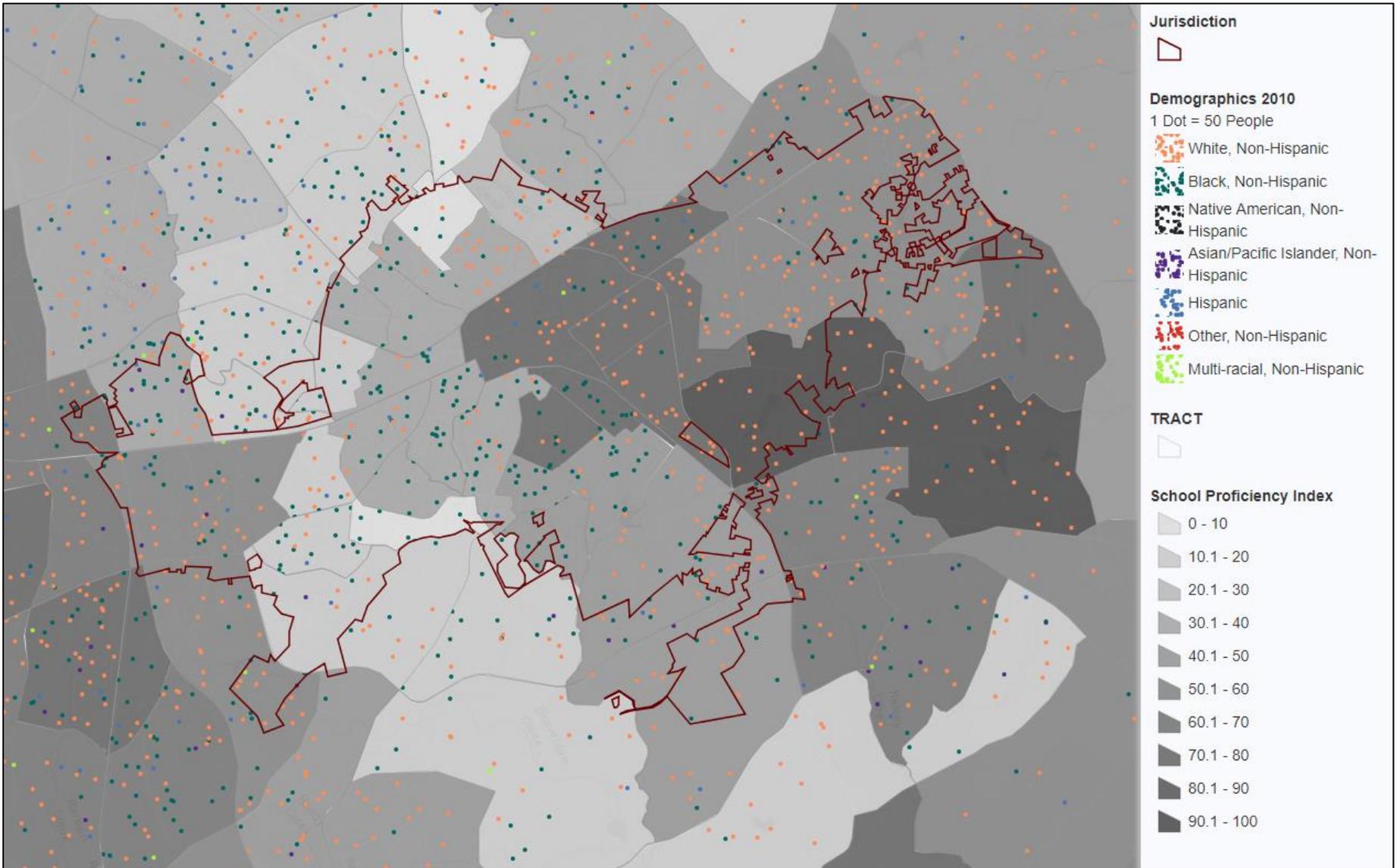
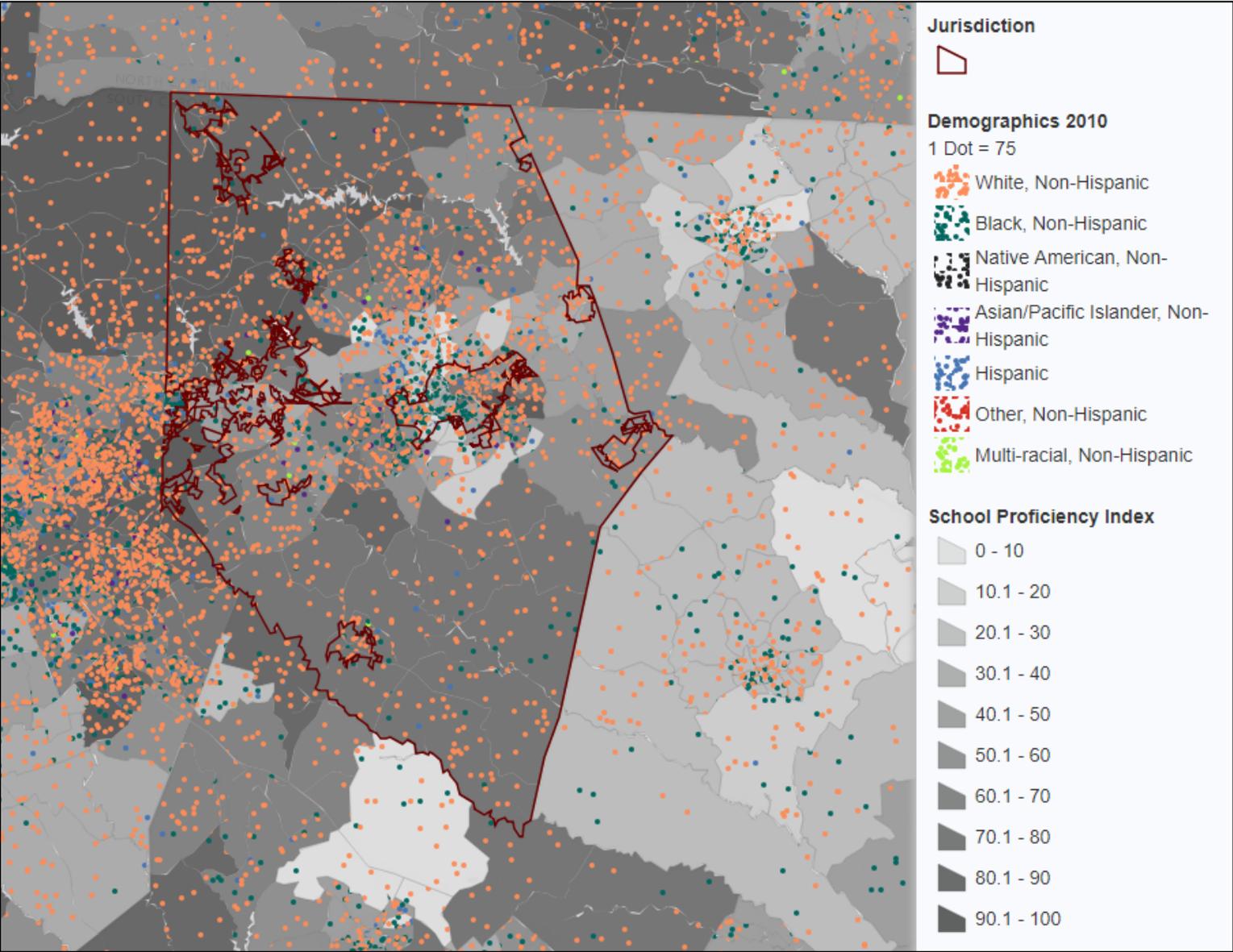


FIGURE 17. SCHOOL PROFICIENCY INDEX IN SPARTANBURG COUNTY



EMPLOYMENT

The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 18 maps the Jobs Proximity Index in the City of Spartanburg and shows that block groups located in the northern portion of the geographic center of the city offer the best access to jobs. The population of these northern block groups with the best access to jobs is majority white. Populations residing in block groups south of the geographic center have the least opportunities to access jobs nearby. These southern block groups with the lowest levels of access to jobs have populations that are majority Black.

Jobs Proximity Index scores in the City of Spartanburg indicate reasonably good access to jobs for all racial and ethnic groups. The disparity in opportunities is minimal between white, Asian, and Hispanic populations. However, the disparity between white and either Black or Native American populations is dramatic. With the exception of the Asian population, there are less disparities in access to jobs between whites below the poverty line and racial and ethnic minority groups below the poverty line. Asian populations below the poverty line have the best access to jobs of all groups in the City of Spartanburg.

Labor market engagement is the highest in the northeastern section of the City of Spartanburg where the majority of the population is white. Several block groups have low labor market engagement, but good access to jobs. However, jobs proximity and labor market engagement generally follow similar patterns in the City of Spartanburg.

Labor Market Engagement Index scores of population groups indicate extreme disparities in the City of Spartanburg. The greatest disparity in labor market engagement is between white and Black populations. Asian, Native American, and Hispanic populations also have significantly lower levels of engagement compared to the white population. There is less labor market engagement of white and Black populations below the poverty line; however, Asian, Native American, and Hispanic populations below the poverty line are more engaged in the labor market.

Figure 19 shows generally uniform levels of access to jobs throughout Spartanburg County. Suburbs immediately north of the City of Spartanburg have the best access to jobs. Several block groups on the western border of the county provide higher levels of access to jobs. The population in these areas are slightly more diverse compared to the rest of the county.

Unlike in the City of Spartanburg, the white population in Spartanburg County has the lowest Jobs Proximity Index score. Black, Asian, Native American, and Hispanic populations all have more access to jobs in Spartanburg County. This also applies to minority groups below the poverty line. The Hispanic population below the poverty line has the best access to jobs among all population groups in the county.

Figure 21 shows uniform labor market engagement throughout Spartanburg County. Block groups north and northwest of the City of Spartanburg show higher levels of labor market engagement. The northwest

corner and the southernmost tip of the county have lower levels of labor market engagement. The lowest labor market engagement is found in block groups immediately north of the City of Spartanburg.

Black, Asian, and Native American populations are more engaged with the labor market in Spartanburg County compared to the same populations in the City of Spartanburg. There is less variation in the level of labor market engagement among racial and ethnic groups unlike the extreme disparities found in the City of Spartanburg. Labor Market Engagement Index scores remain relatively similar for populations below the poverty line with the exception of the Native American population. Out of all population groups, the Native American population below the poverty line is the most engaged in the labor market. The Hispanic population, both above and below the poverty level, is the least engaged in the labor market in Spartanburg County.

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FIGURE 18. JOBS PROXIMITY INDEX IN THE CITY OF SPARTANBURG

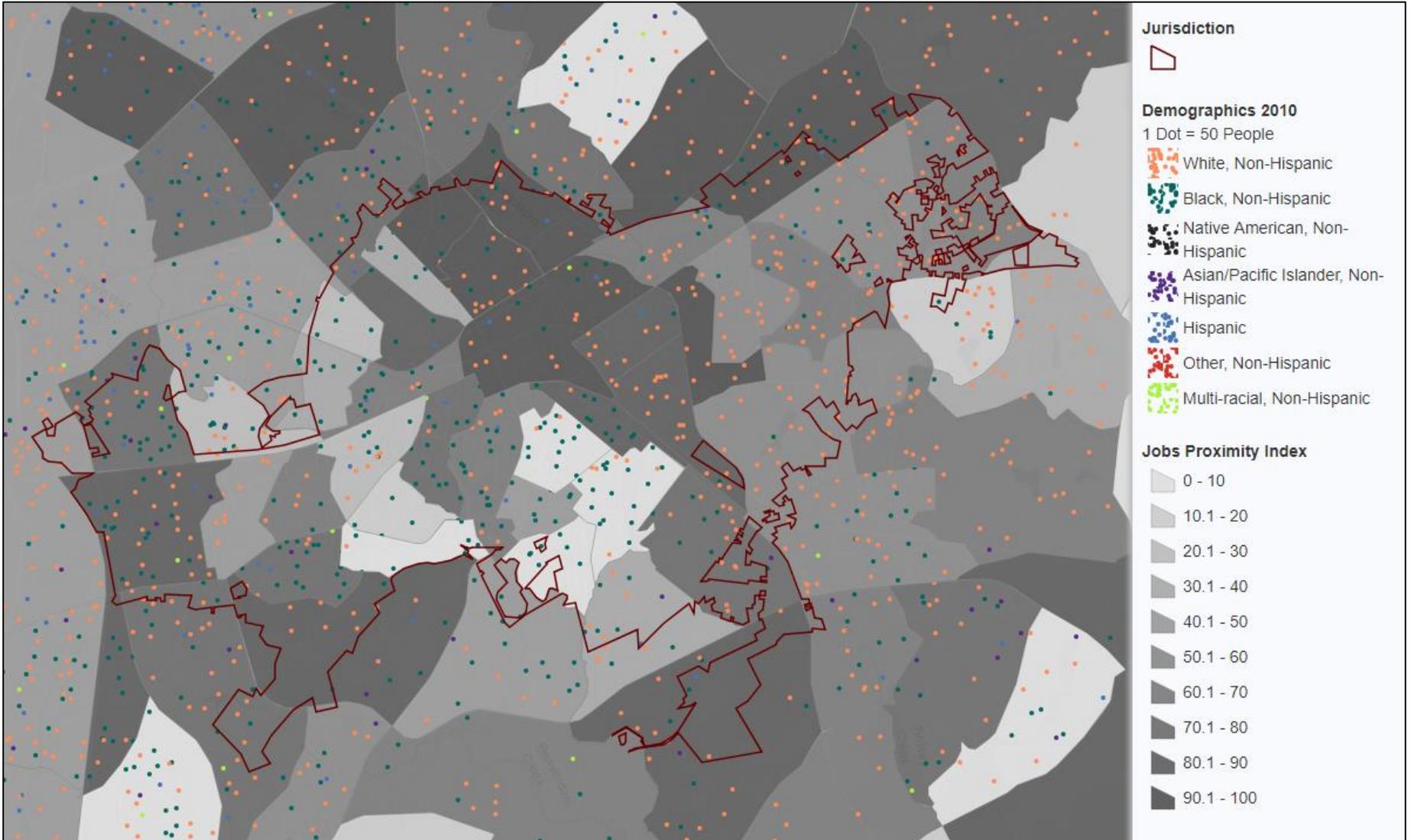


FIGURE 19. JOBS PROXIMITY INDEX IN SPARTANBURG COUNTY

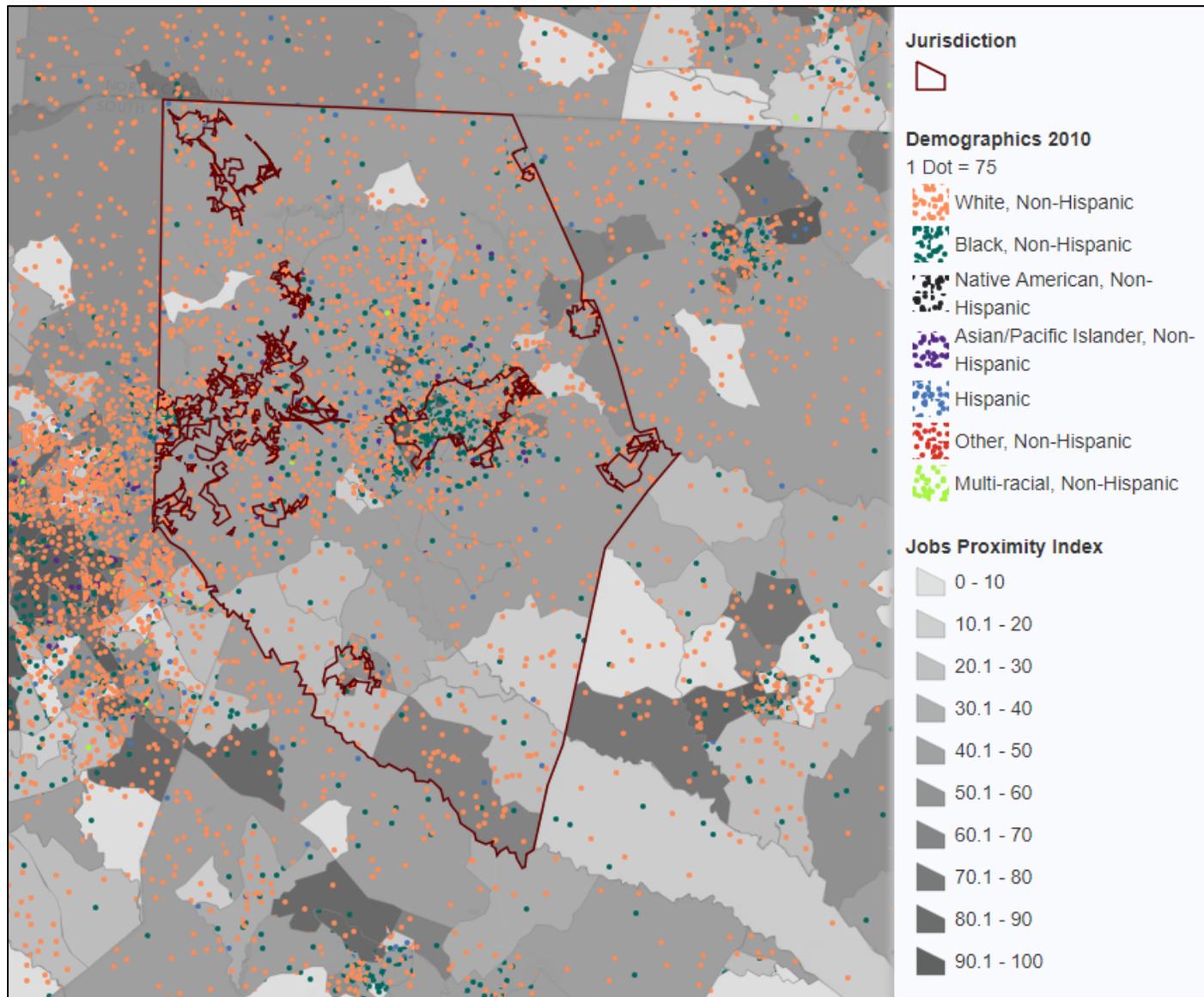


FIGURE 20. LABOR MARKET INDEX IN THE CITY OF SPARTANBURG

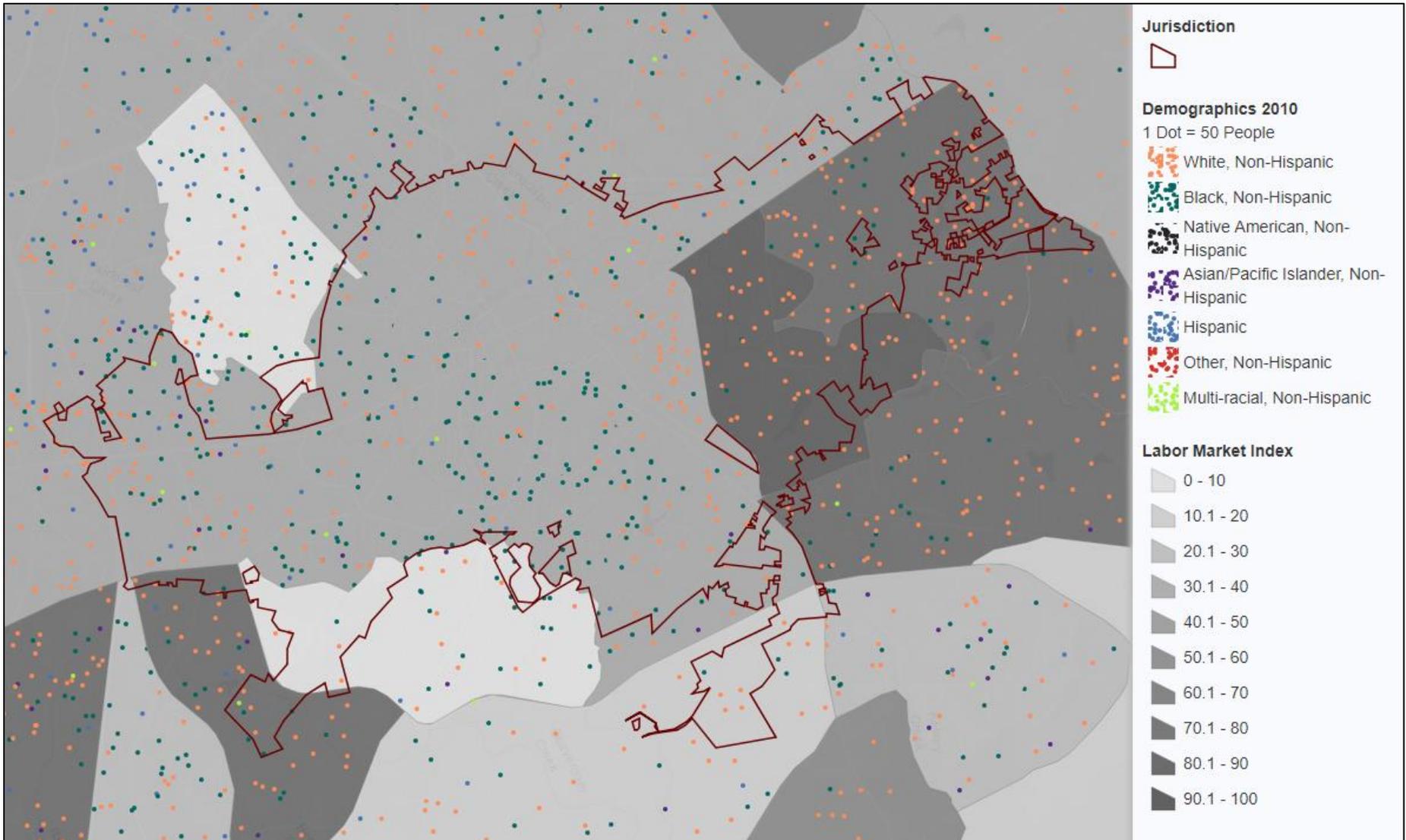
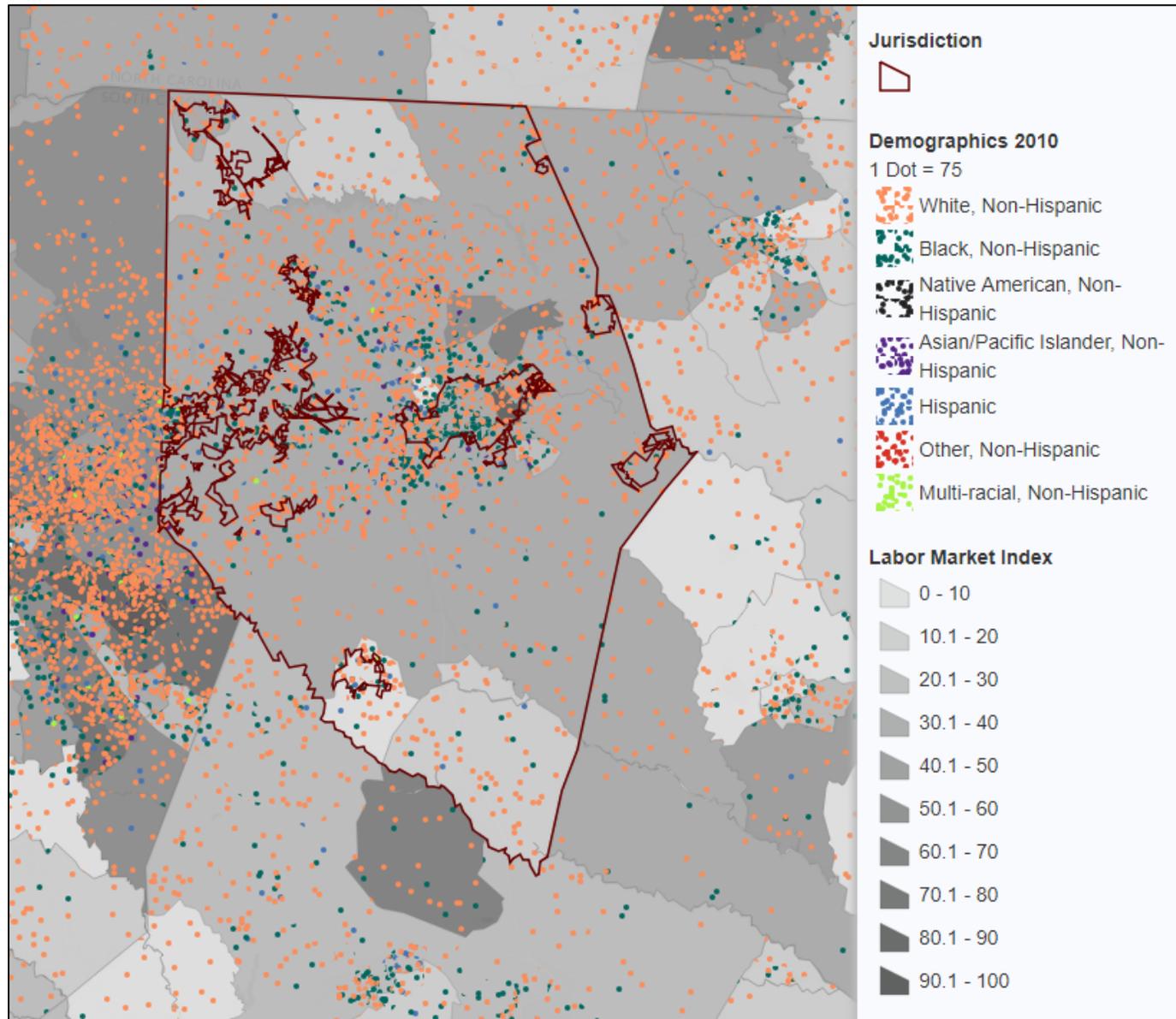


FIGURE 21. LABOR MARKET INDEX IN SPARTANBURG COUNTY



TRANSPORTATION

The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The higher the Low Transportation Cost Index, the lower the cost of transportation in that block group. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

The highest transit usage in the City of Spartanburg occurs in block groups north and south of the geographic center of the city. Most of the block groups with the highest transit usage are majority Black. Block groups on the eastern side of the city are majority white and use less transit compared to all other areas of the city.

Transit usage in Spartanburg County is uniform throughout most of the county. The lowest transit usage is found along the borders and the corners of the county. Block groups surrounding the city experience the highest usage of transit and house more diverse populations compared to the rest of the county. The Spartanburg Area Regional Transit Agency (SPARTA) provides public bus service within the City of Spartanburg as well as several destinations outside the city limits.

Transit Trip Index scores in the City of Spartanburg indicate high and equal levels of usage among all population groups. The Asian population uses transit the least and the Black population uses transit the most. Transit use increases for white, Black and Hispanic populations below the poverty line. The opposite is true for the Asian and Native American populations below the poverty line.

There is less transit usage overall in Spartanburg County and less variation in usage rates between racial and ethnic groups. The most frequent users of transit are the Hispanic population in Spartanburg County. The white population uses transit the least, whether above or below the poverty line. Transit usage increases for populations below the poverty line, especially for Native American and Hispanic populations.

Low Transportation Cost scores are generally similar across all racial and ethnic groups in the City of Spartanburg. Black populations below the poverty line have the lowest cost and Native Americans below the poverty line have the highest cost in the City of Spartanburg.

The Low Transportation Cost is lower in Spartanburg County than in the City of Spartanburg. This indicates that residents of the county generally spend less on transportation than city residents. In Spartanburg County, transportation costs are lowest for the Hispanic population below the poverty line. Transportation is most costly for the white population above the poverty line in Spartanburg County.

FIGURE 22. TRANSIT TRIPS INDEX IN THE CITY OF SPARTANBURG



FIGURE 23. TRANSIT TRIPS INDEX IN SPARTANBURG COUNTY

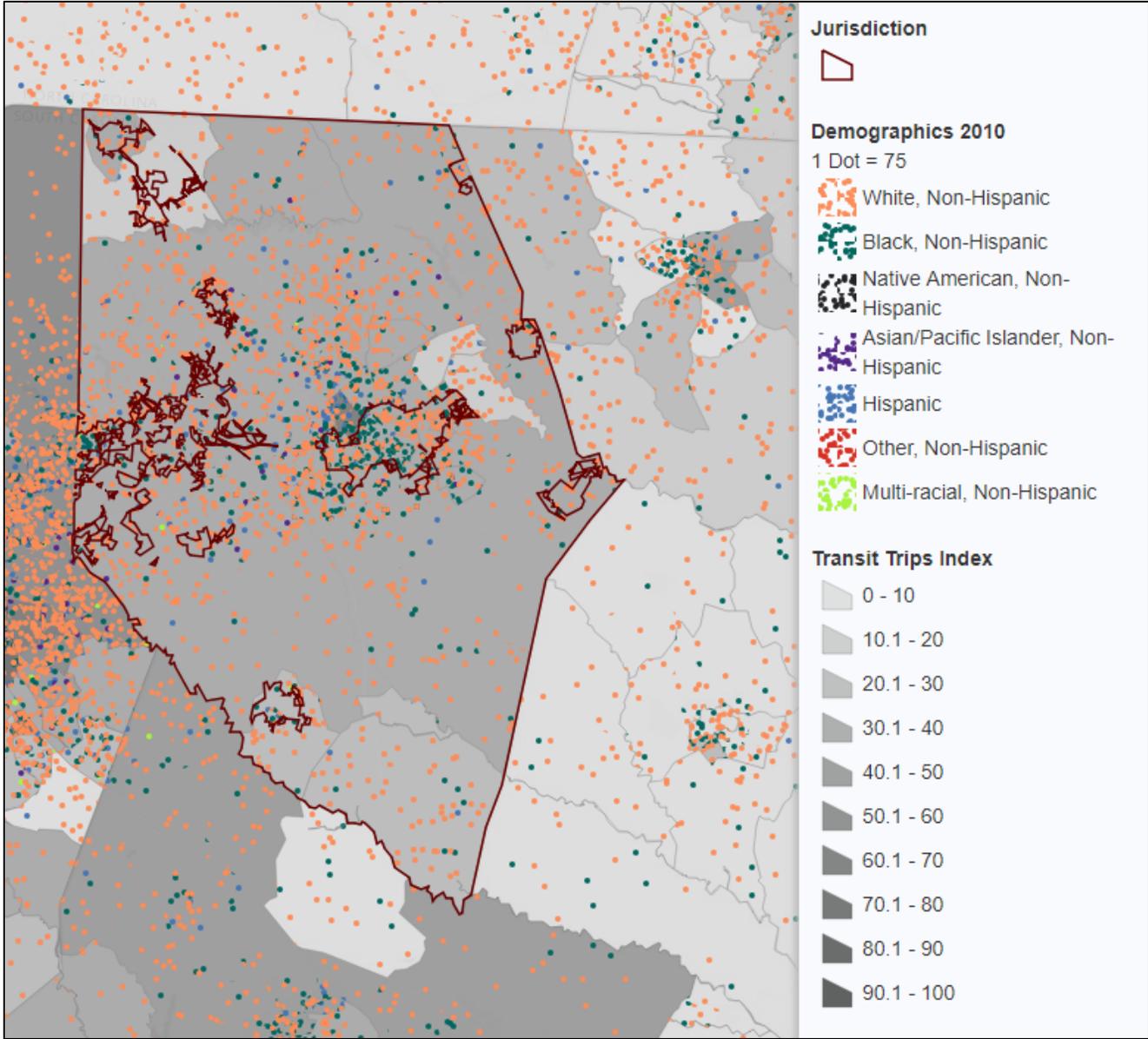
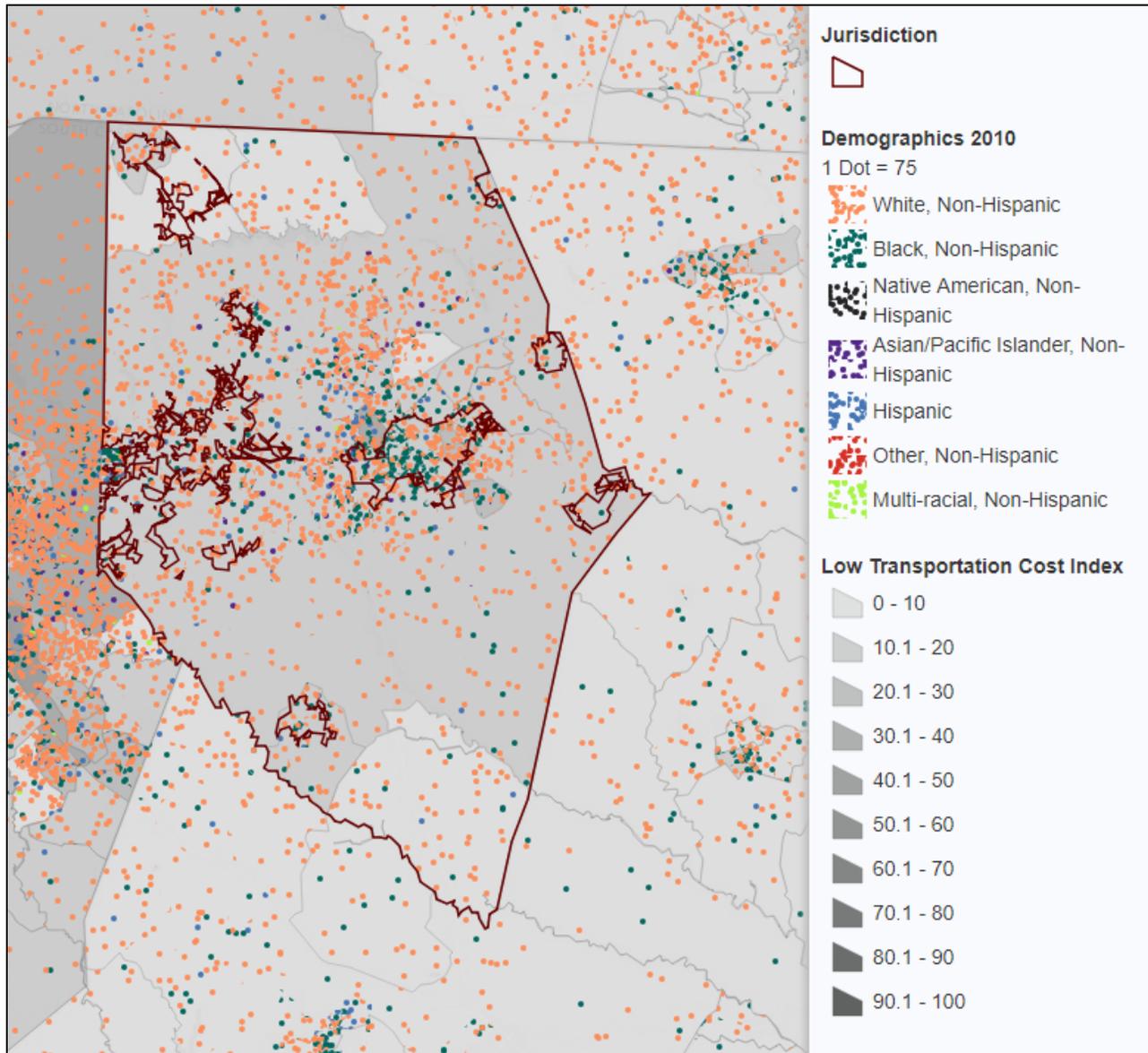


FIGURE 24. LOW TRANSPORTATION COST INDEX IN THE CITY OF SPARTANBURG



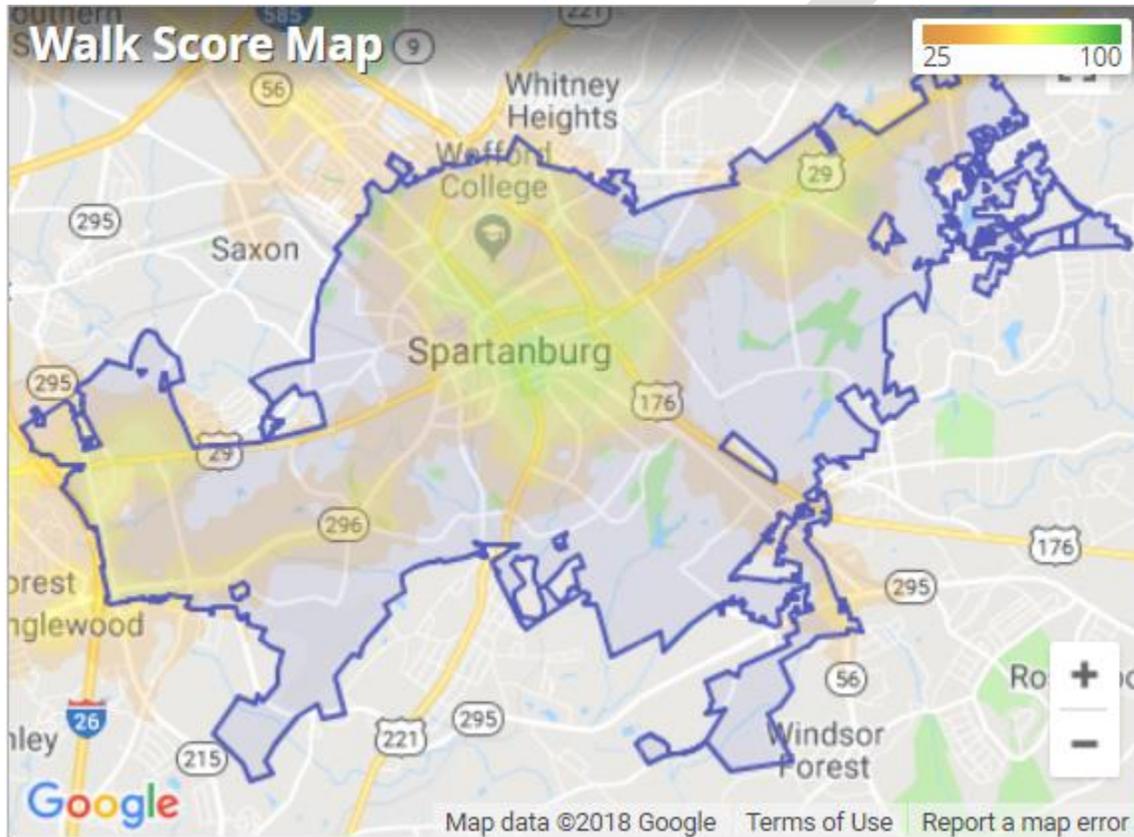
FIGURE 25. LOW TRANSPORTATION COST INDEX IN THE CITY OF SPARTANBURG



Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. The most walkable areas are centrally located in the City of Spartanburg. Areas in the northeast corner of the city are also conducive to walking.

FIGURE 26. WALKABILITY IN THE CITY OF SPARTANBURG



Source: Walkscore, Retrieved from: <https://www.walkscore.com/ID/Spartanburg>

POVERTY

HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of higher levels of poverty and darker shading indicates lower levels of poverty.

The highest poverty areas in the City of Spartanburg are concentrated in block groups in the north central and southwest central areas of the city. In Spartanburg County, high poverty areas are located in block groups immediately north of the city. The population in most these high poverty areas are majority Black or include large segments of minority populations. In addition to the correlation with race and ethnicity, high poverty areas coincide with spatial patterns tracking access to opportunities.

Low Poverty Index scores indicate significant disparities based on race and ethnicity in the City of Spartanburg. The Native American population below the poverty line is least likely to live in neighborhoods with high poverty. The difference in Low Poverty Index scores between white and Black populations suggest the high levels of exposure to poverty that Black populations experience in the City of Spartanburg. Asian and Native American populations below the poverty line have less exposure to high poverty areas, while Black populations below the poverty line have increased exposure.

In Spartanburg County, the Asian population and the Native American population below the poverty line are exposed the least to areas of high poverty. The Hispanic population is most likely to experience or live among high levels of poverty. The Hispanic population below the poverty line has the highest exposure to poverty of all groups in Spartanburg County.

FIGURE 27. LOW POVERTY INDEX IN THE CITY OF SPARTANBURG

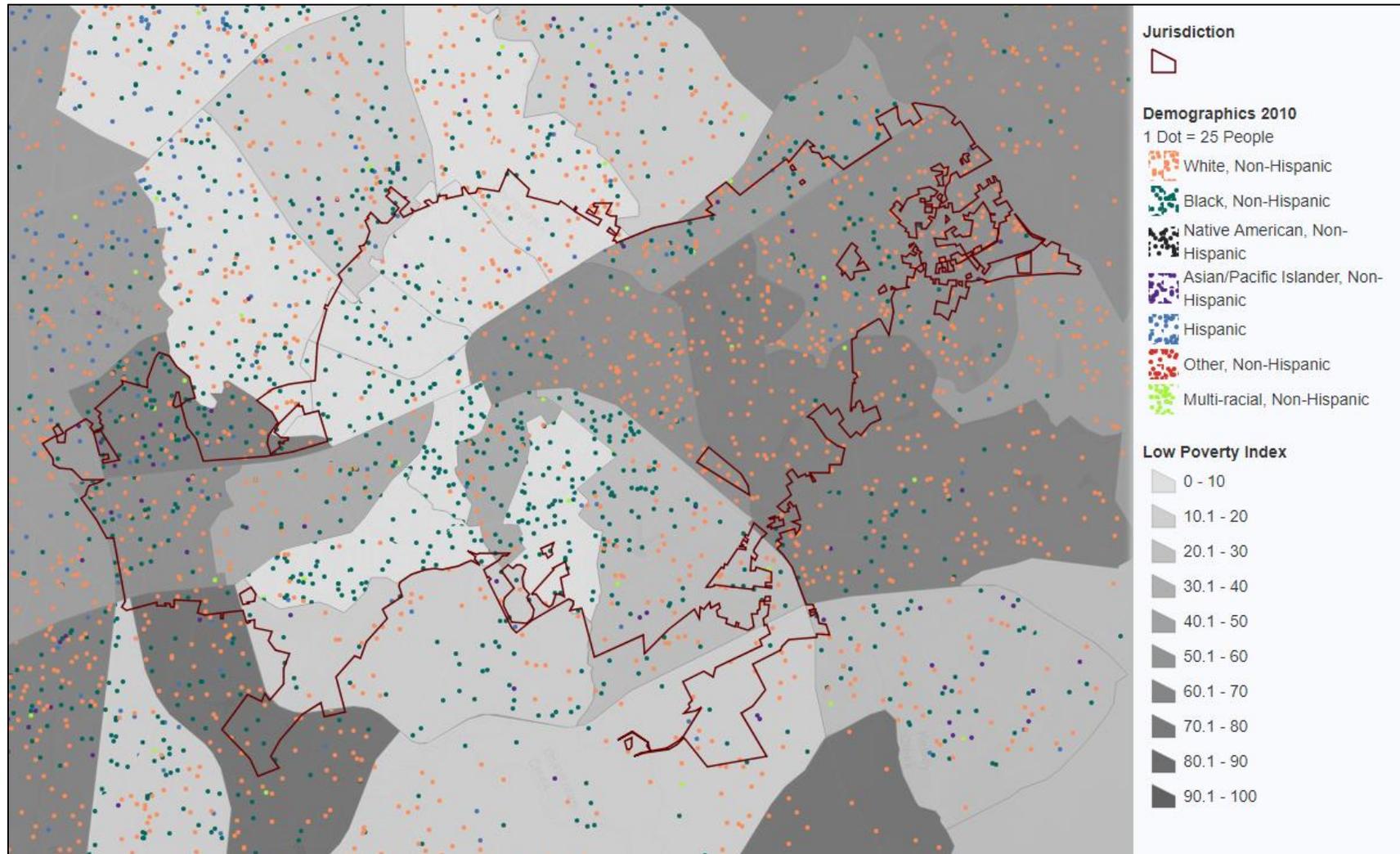
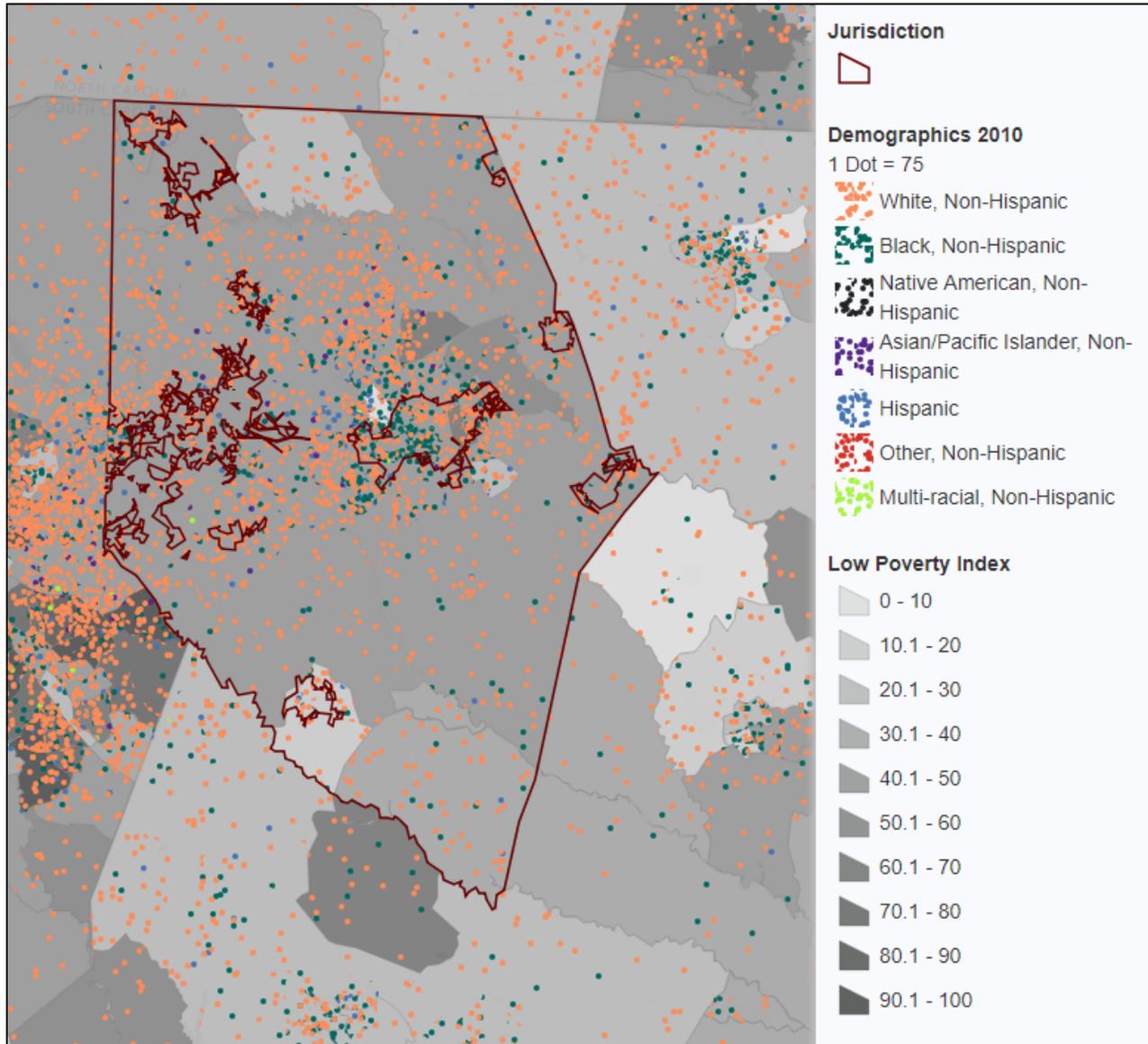


FIGURE 28. LOW POVERTY INDEX IN SPARTANBURG COUNTY



ENVIRONMENTAL HEALTH

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower air quality and darker shading indicates higher air quality.

The overall air quality in the City of Spartanburg is on the lower end of the spectrum. Air quality is relatively uniform through all areas of the city. Block groups with the lowest quality are found close to the city center and the best air quality can be found in the northeast section of the city. Although it is difficult to determine any correlation between racial composition of block groups and air quality, the northeast section is where there are heavy concentrations of the white population. The lowest air quality in Spartanburg County is found in areas immediately surrounding the city. The block groups surrounding the city are also the most racially and ethnically diverse in Spartanburg County.

The Environmental Health Index scores in the City of Spartanburg suggest the presence of low air quality and similar levels of exposure across all racial and ethnic groups. Native Americans below the poverty line in the city have less exposure to the low air quality compared to others. The air quality in Spartanburg County is better as evidenced by the higher Environmental Health Index scores, but there are also slightly larger disparities between population groups. The scores suggest the white population resides in areas with the better air quality and the Black population and the Hispanic population below the poverty line live in areas with lower air quality.

FIGURE 29. ENVIRONMENTAL HEALTH INDEX IN THE CITY OF SPARTANBURG

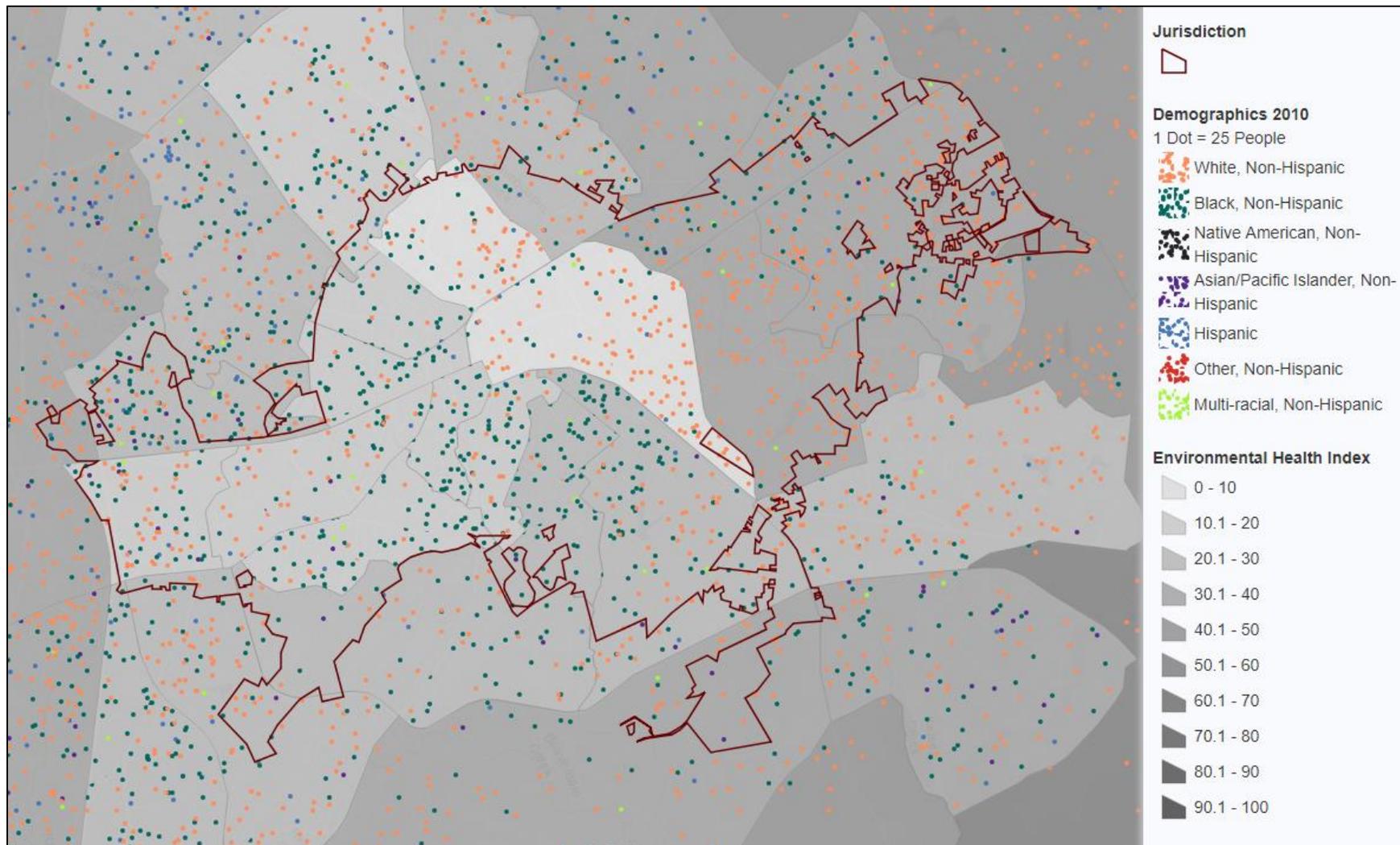
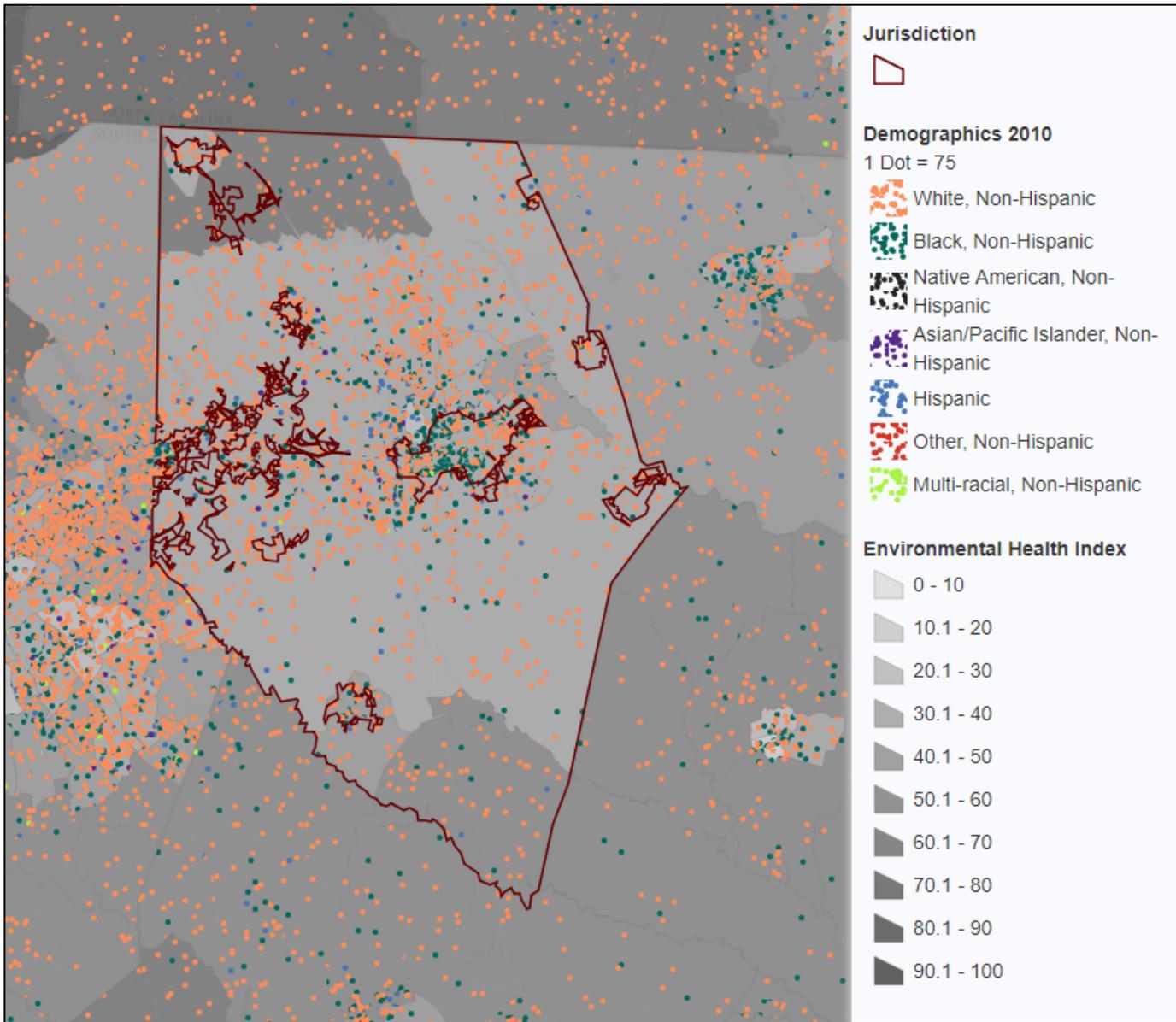
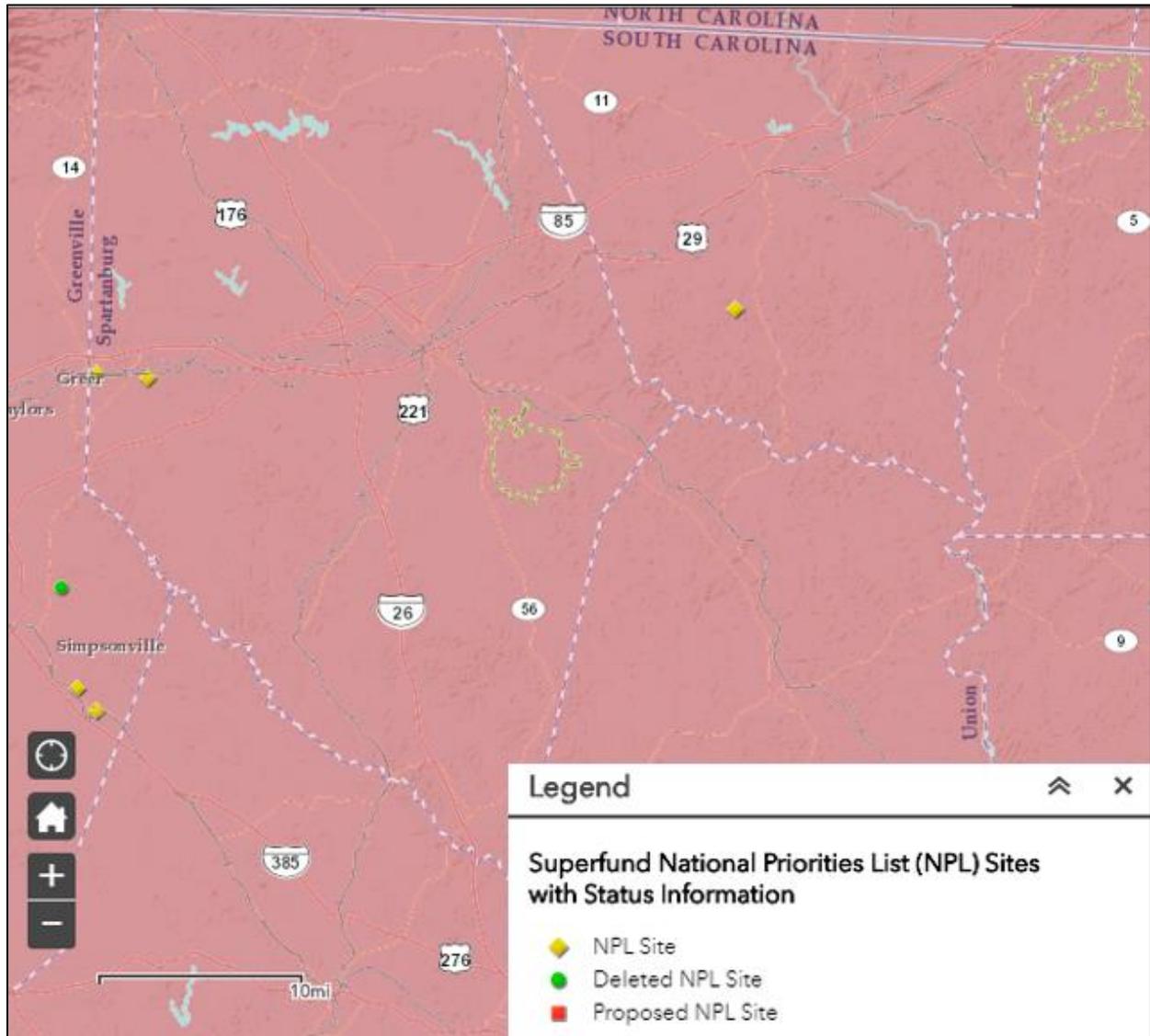


FIGURE 30. ENVIRONMENTAL HEALTH INDEX IN SPARTANBURG COUNTY



A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There are two Superfund sites in Spartanburg County located near the western border.

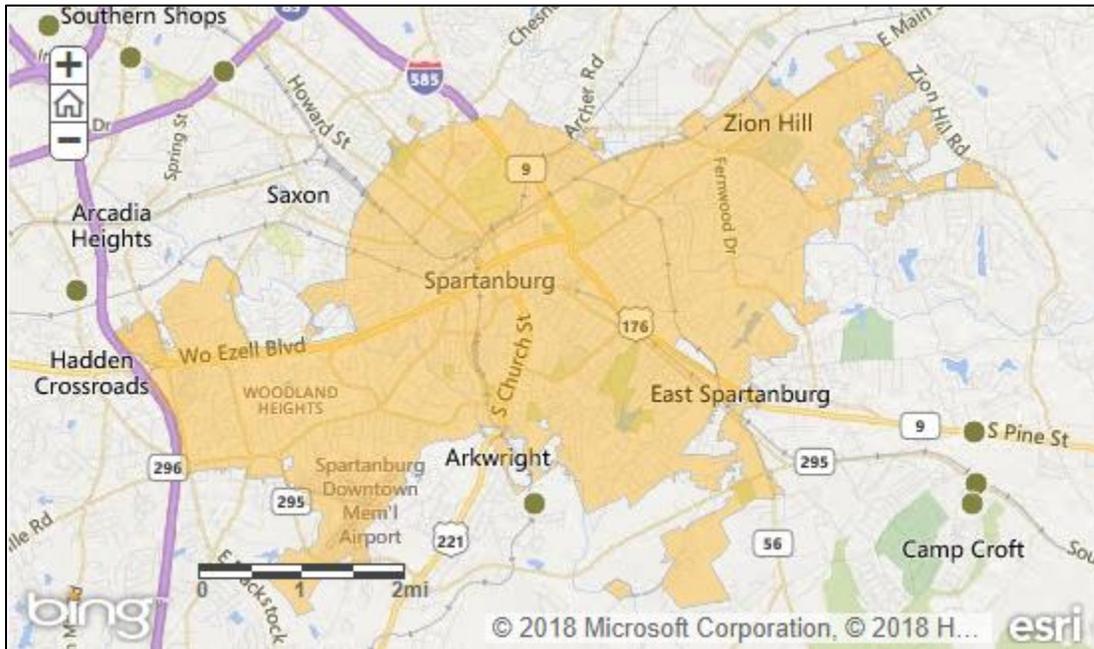
FIGURE 31. SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE SPARTANBURG REGION



Source: Environmental Protection Agency GIS Data, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste. There are no sites located within the City of Spartanburg. Sites in Spartanburg County are located along major expressways and bodies of water.

FIGURE 32. TOXIC RELEASE INVENTORY (TRI) IN THE CITY OF SPARTANBURG



Source: Environmental Protection Agency GIS Data, Retrieved from:
https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?pstate=SC&pcity=spartanburg&pYear=2016&pParent=NAT

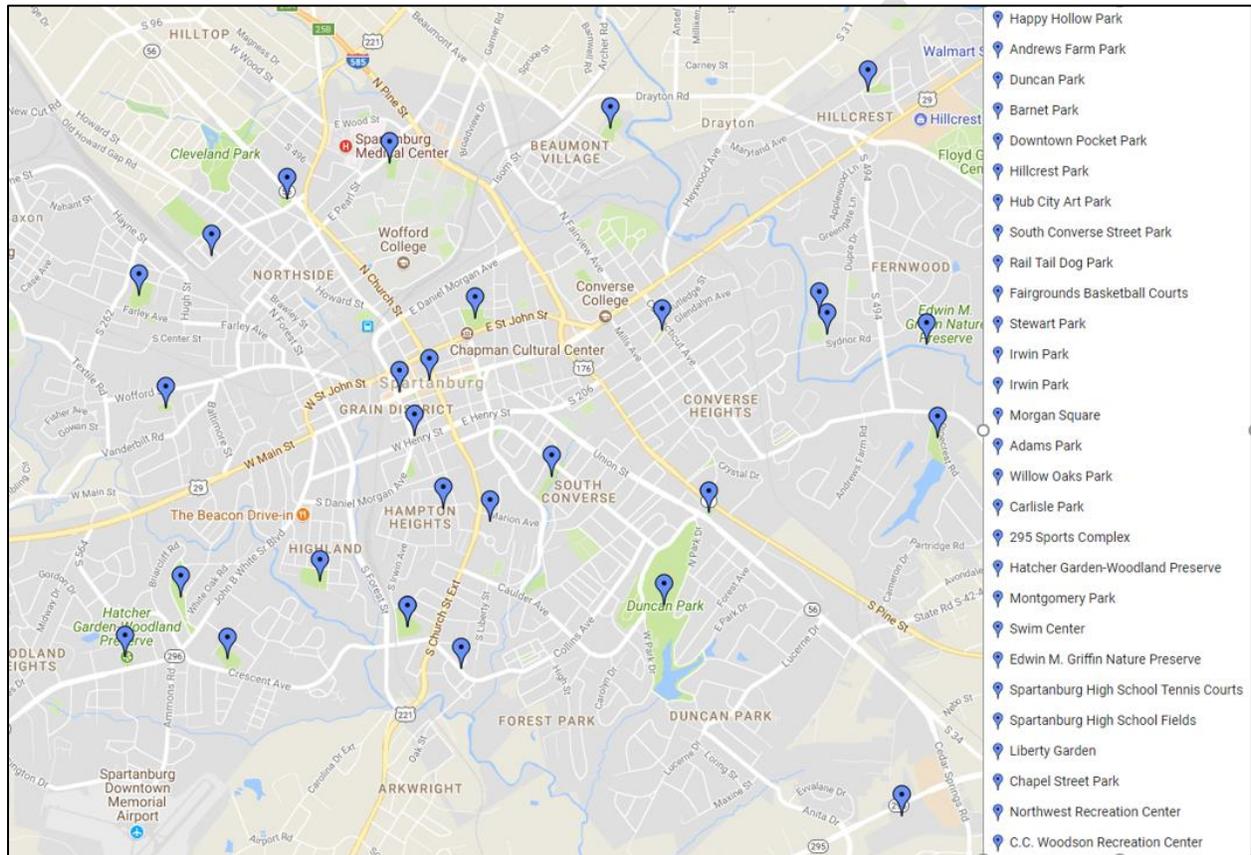
FIGURE 33. TOXIC RELEASE INVENTORY (TRI) IN SPARTANBURG COUNTY



Source: Environmental Protection Agency GIS Data, Retrieved from:
https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?pstate=SC&pcounty=spartanburg&pYear=2016&pParent=NAT

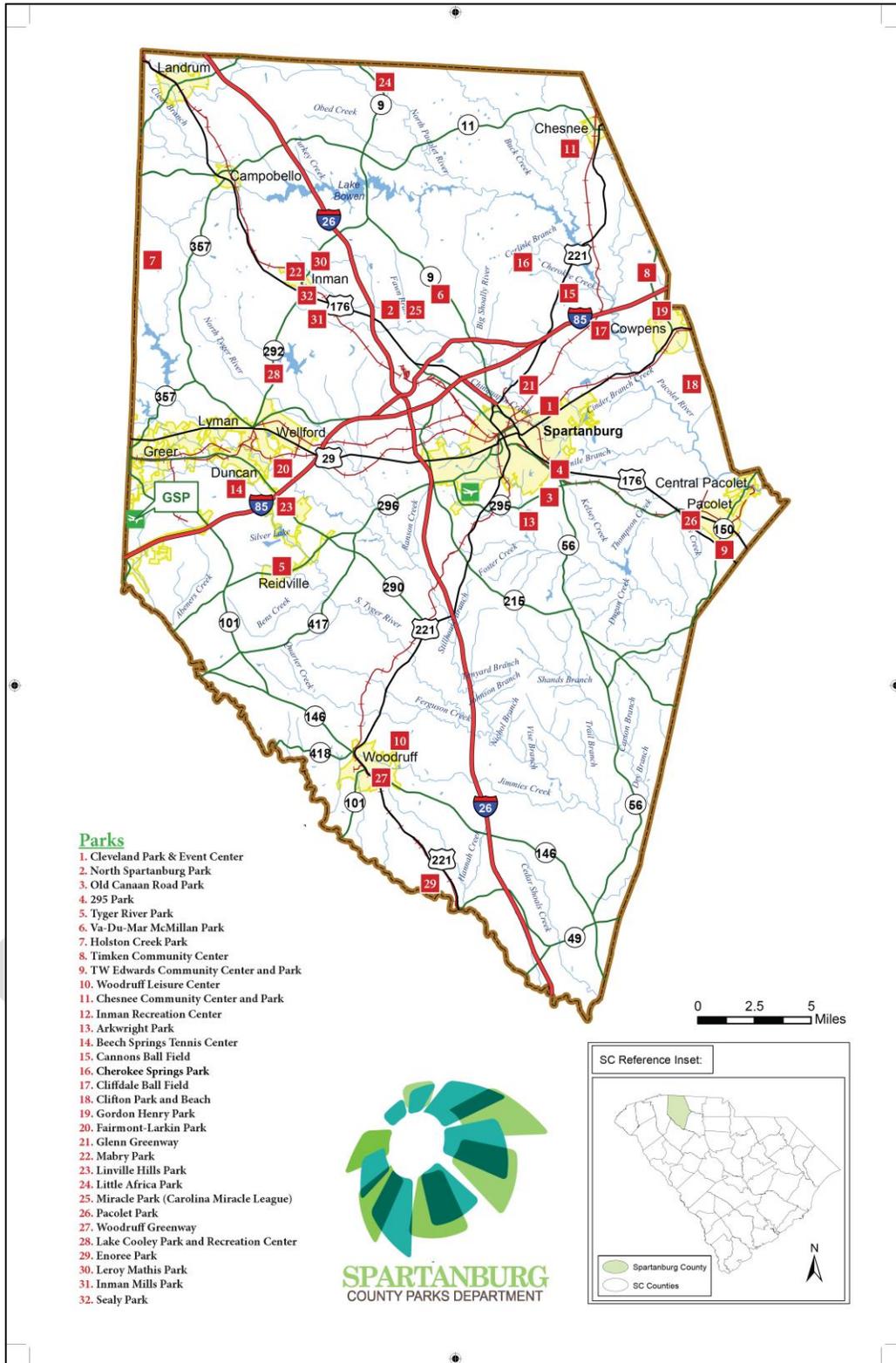
Parks play an important role in the quality of life and health of communities. Parks are public resources that provide space for recreation, social interactions, and preservation of green space. Accessibility to these amenities depends on location, safety, interconnection, and design. Parks are distributed throughout the City of Spartanburg, however, there are more parks in the southwestern half of the city and concentrations of parks are found closer to the center of the city. In the county, parks are located around the cities, near the population centers, with fewer in the less-populated southern portion of the county. There are also fewer parks in the northwest around Landrum.

FIGURE 34. PARKS IN THE CITY OF SPARTANBURG



Source: City of Spartanburg Parks and Recreation, Retrieved from: https://www.google.com/maps/d/viewer?mid=1G1uCSwDe_NGHuBhcDYT7Mf9UUZ4&ll=34.94450100348713%2C-81.92339649999997&z=14

FIGURE 35. PARKS IN SPARTANBURG COUNTY



Source: Spartanburg County Parks Department

SUMMARY

Spatial distribution patterns of racial composition and index scores indicate unequal access to opportunities among different population groups. Similar patterns associated with race and ethnicity appear throughout the City of Spartanburg and Spartanburg County when examining the level of access to schools, employment, jobs transit, and environmental health.

Generally, Black and Hispanic populations are concentrated in block groups that have the lowest levels of access to proficient schools in both the city and county. Residents in Spartanburg County have higher levels of access to proficient schools compared to the City of Spartanburg, minority groups still have less access compared to the white population. In both the city and county, most of the block groups that have school proficiency index scores above 50 are majority white.

The level of access to jobs in the city and county are also closely associated with race and ethnicity. Labor Market Engagement Index scores of population groups indicate significant disparities in the City of Spartanburg. The population in block groups with the best access to jobs is majority white and block groups with the lowest levels of access to jobs have population are majority Black. The disparity between white and either Black or Native American populations is dramatic in the City of Spartanburg.

Access to jobs in Spartanburg County deviate from the pattern found in the City of Spartanburg. Block groups with the best access to jobs are slightly more diverse compared to the rest of the county. According to Jobs Proximity Index scores, Black, Asian, Native American, and Hispanic populations all have better access to jobs compared to the white population in Spartanburg County. Black, Asian, and Native American populations are also more engaged with the labor market in Spartanburg County compared to the same populations in the City of Spartanburg.

Transit usage is relatively uniform across all population groups in the City of Spartanburg and Spartanburg County; however, there is a correlation between transit usage and race and ethnicity. Black and Hispanic populations are the most frequent users of transit in the city and county, respectively. Transportation costs the least for the Black and Hispanic population below the poverty line.

Exposure to poverty can impact access to the various opportunities discussed previously. The population in high poverty areas in both the city and county are majority Black or include large segments of minority populations. Low Poverty Index scores indicate populations with the highest levels of exposure to poverty are Black and Hispanic populations. The Asian population above the poverty line and Native American population below the poverty line have the least exposure to areas of high poverty in the city and county.

Environmental Health Index scores suggest the white population resides in areas with slightly better air quality while the Black population and the Hispanic population below the poverty line live in areas with the lowest air quality. The lowest air quality is found in and around the city where the block groups are the most racially and ethnically diverse in Spartanburg County.

CHAPTER 6.

HOUSING PROFILE

AFFORDABILITY AND HOUSING NEED

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

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

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

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

Disproportionate Housing Needs	City of Spartanburg			Spartanburg County			Spartanburg Region		
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity									
White, Non-Hispanic	2,205	7,885	28.0%	14,377	62,479	23.0%	20,324	86,484	23.5%
Black, Non-Hispanic	3,175	6,950	45.7%	5,380	12,122	44.4%	11,484	25,893	44.3%
Hispanic	57	247	23.1%	1,290	3,081	41.9%	1,740	3,999	43.5%
Asian or Pacific Islander, Non-Hispanic	78	213	36.6%	438	1,204	36.4%	595	1,610	37.0%
Native American, Non-Hispanic	25	39	64.1%	100	214	46.7%	130	272	47.8%
Other, Non-Hispanic	40	159	25.2%	281	573	49.0%	449	955	47.0%
Total	5,570	15,485	36.0%	21,885	79,725	27.5%	34,710	119,205	29.1%
Household Type and Size									
Family households, <5 People	2,400	8,124	29.5%	11,497	50,746	22.7%	17,515	72,975	24.0%
Family households, 5+ People	300	845	35.5%	2,951	7,581	38.9%	3,890	10,184	38.2%
Non-family households	2,875	6,530	44.0%	7,433	21,386	34.8%	13,315	36,060	36.9%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity									
White, Non-Hispanic	1,010	7,885	12.8%	6,580	62,479	10.5%	9,249	86,484	10.7%
Black, Non-Hispanic	1,730	6,950	24.9%	2,871	12,122	23.7%	5,989	25,893	23.1%
Hispanic	33	247	13.4%	812	3,081	26.4%	1,065	3,999	26.6%
Asian or Pacific Islander, Non-Hispanic	45	213	21.1%	211	1,204	17.5%	305	1,610	18.9%
Native American, Non-Hispanic	10	39	25.6%	65	214	30.4%	84	272	30.9%
Other, Non-Hispanic	30	159	18.9%	143	573	25.0%	229	955	24.0%
Total	2,860	15,485	18.5%	10,718	79,725	13.4%	16,925	119,205	14.2%

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

TABLE 5. DEMOGRAPHICS OF HOUSEHOLDS WITH HOUSING NEEDS

TABLE 6. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Households with Severe Cost Burdens	City of Spartanburg			Spartanburg County			Spartanburg Region		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race/Ethnicity									
White, Non-Hispanic	945	7,885	12.0%	5,618	62,479	9.0%	7,895	86,484	9.13%
Black, Non-Hispanic	1,585	6,950	22.8%	2,332	12,122	19.2%	5,165	25,893	19.95%
Hispanic	34	247	13.8%	338	3,081	11.0%	490	3,999	12.25%
Asian or Pacific Islander, Non-Hispanic	45	213	21.1%	115	1,204	9.6%	200	1,610	12.42%
Native American, Non-Hispanic	10	39	25.6%	55	214	25.7%	74	272	27.21%
Other, Non-Hispanic	30	159	18.9%	144	573	25.1%	214	955	22.41%
Total	2,649	15,485	17.1%	8,602	79,725	10.8%	14,038	119,205	11.78%
Household Type and Size									
Family households, <5 People	1,235	8,124	15.2%	4,068	50,746	8.0%	6,761	72,975	9.26%
Family households, 5+ People	110	845	13.0%	801	7,581	10.6%	1,024	10,184	10.05%
Non-family households	1,309	6,530	20.0%	3,717	21,386	17.4%	6,239	36,060	17.30%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

In the City of Spartanburg, there are 5,570 households with at least one housing problem, constituting over one-third of households citywide (36%). Just under a fifth of households in the city have a severe need (2,860 households or 18.5%). In Spartanburg County levels of need are lower overall, 27.5% of households have a problem, and 13.4% have a severe problem, but they are higher for some racial and ethnic groups. Levels of need in the region are lower than those of the City of Spartanburg but higher than Spartanburg County: 29.1% of households have a housing problem and 14.2% have a severe housing problem.

Looking at need by householder race and ethnicity in the City of Spartanburg shows that 28% of non-Latino white households have at least one housing problem and 12.8% have a severe housing problem. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households.

Using this definition, there are two groups in the City of Spartanburg with disproportionate needs. Native American and African-American households have disproportionate rates of both housing problems and severe housing problems. 64.1% of Native American households have a housing need, and 25.6% have a severe need. 45.7% of African-American households have a housing need, and 24.9% have a severe need.

In Spartanburg County, housing and severe housing need rates for white households are slightly lower than those in the City of Spartanburg at 23% and 10.5%, respectively. All non-white races and ethnicities show a disproportionate rate of households with problems, with other Non-Hispanic households having the highest rate (49%), followed by Native American (46.7%), African-American (44.4%), Hispanic (41.9%), and Asian American (36.4%) households. All these groups showed disproportionate rates of households with severe problems as well.

Within the region, housing and severe housing need rates for white households are lower than those in the City of Spartanburg and similar to those in Spartanburg County at 23.5% and 10.7%, respectively. Again, all non-white races and ethnicities show a disproportionate rate of households with problems, with Native American households showing the highest rate (47.8%), followed by other Non-Hispanic households (47%), African-American (44.3%), Hispanic (43.5%), and Asian American (37%) households. All these groups except for Asian Americans showed disproportionate rates of households with severe problems as well.

Table 5 also compares housing need rates for households by size and familial status. In the City of Spartanburg, nonfamily households have the highest rate of housing with a problem (44%), followed by family households with five or more children (35.5%) and family households with less than five children (29.5%). In Spartanburg County, family households with more than five children have the greatest need (38.9%), followed by non-family households (34.8%) and families with less than five children (22.7%). The pattern in the region is very similar to the county.

Table 6 examines only one dimension of housing need – severe cost burdens. Overall, 2,649 households in the City of Spartanburg (17.1%) and 8,602 in Spartanburg County (10.8%) spend more than 50% of their income on housing. In the City of Spartanburg, African-American and Native American households have a disproportionate rate of severe cost burdens compared to whites (22.8% and 25.6% versus 12% respectively). In Spartanburg County, African-American, (19.2%), Native American (25.7%), and Other,

Non-Hispanic (25.1%) households have disproportionate severe cost burdens relative to white households (9%). Here again, regional trends are similar to the County.

Table 6 also shows that 20% of non-family households in the City of Spartanburg have a severe cost burden, compared to 15.2% for small families and 13% for large families. In Spartanburg County, non-family households are also the most likely to have a cost burden (17.4%), but large families (10.6%) are slightly more like than small families to (8%) The rates in Spartanburg County are similar at the regional level.

Overall, African-American households are disproportionately impacted by housing problems, severe housing problems, and severe cost burdens in the City of Spartanburg. In Spartanburg County and the region, both African American and Native American households are most disproportionately affected. Other Non-Hispanic households and Hispanic households are somewhat disproportionately affected.

Figures 36 and 37 map the prevalence of housing cost burdens in the city and county of Spartanburg by census tract. There are several tracts in which 40% or more of households have a housing burden. In the City of Spartanburg this includes tracts 20400, 20500, and 21001, which also have higher shares of African-American residents than other parts of the city. Tracts 20602 and 20301 also have rates over 40%, but these areas are more diverse.

In Spartanburg County, tracts 21802, 21804, 21700, 22900, and 22303 have the highest percentage of households with a burden, and each of these tracts has a higher African-American population than the county overall.

Looking at nationality, of the tracts with households with more than 40% housing burdens, tract 20400 has a concentration of Mexican immigrants. Tract 20500 has noticeable Mexican and Korean populations, and tract 20602 has Mexican, Filipino, and Korean populations.

In Spartanburg County, of the tracts with households with more than 40% housing burdens, tracts 23302, 21802 and 21804 have a significant concentration of Mexican immigrants. Less pronounced but significant Mexican immigrant populations also exist in tracts 22900 and 22303.

FIGURE 36. HOUSING BURDEN AND RACE / ETHNICITY IN THE CITY OF SPARTANBURG

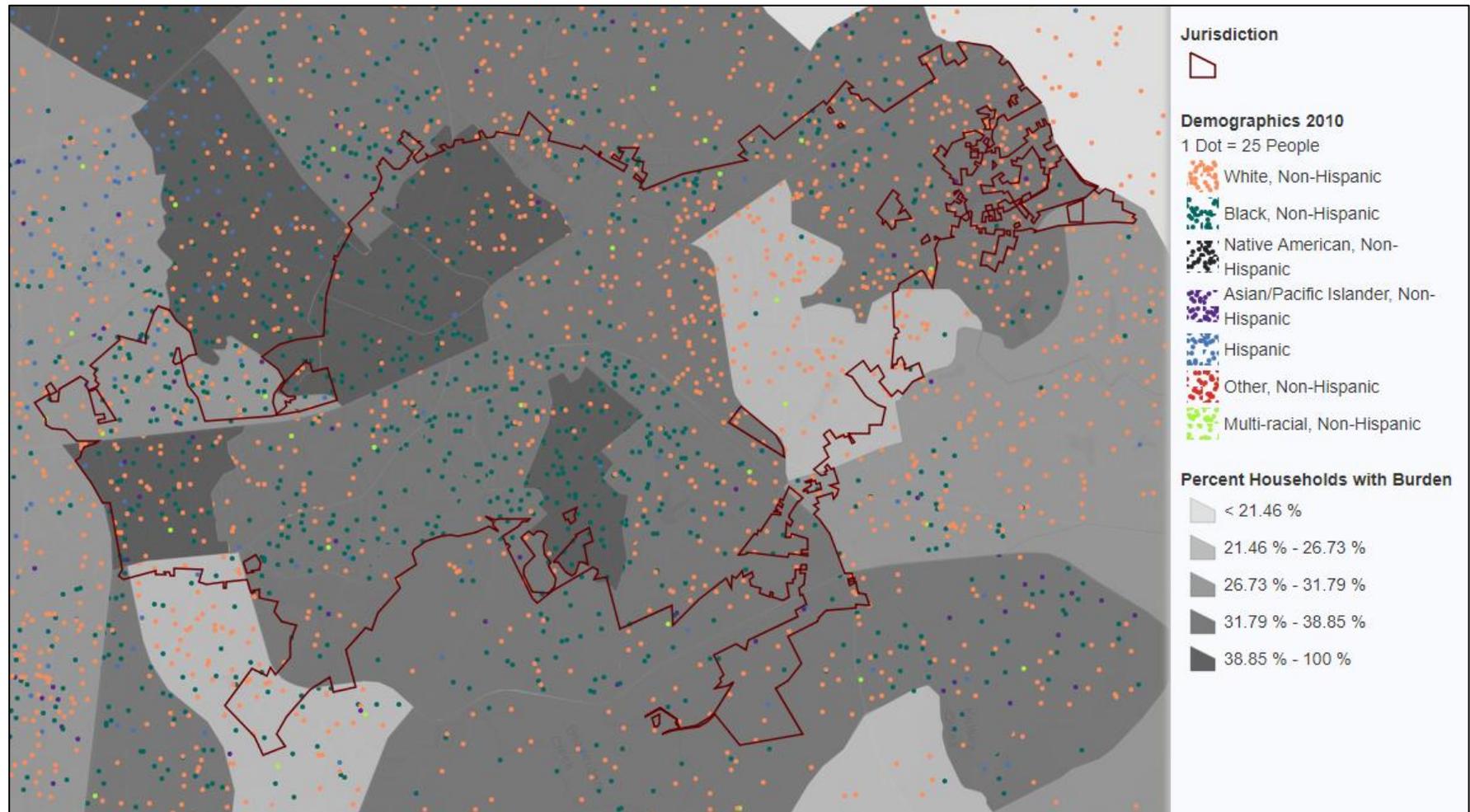


FIGURE 37. HOUSING BURDEN AND RACE / ETHNICITY IN SPARTANBURG COUNTY

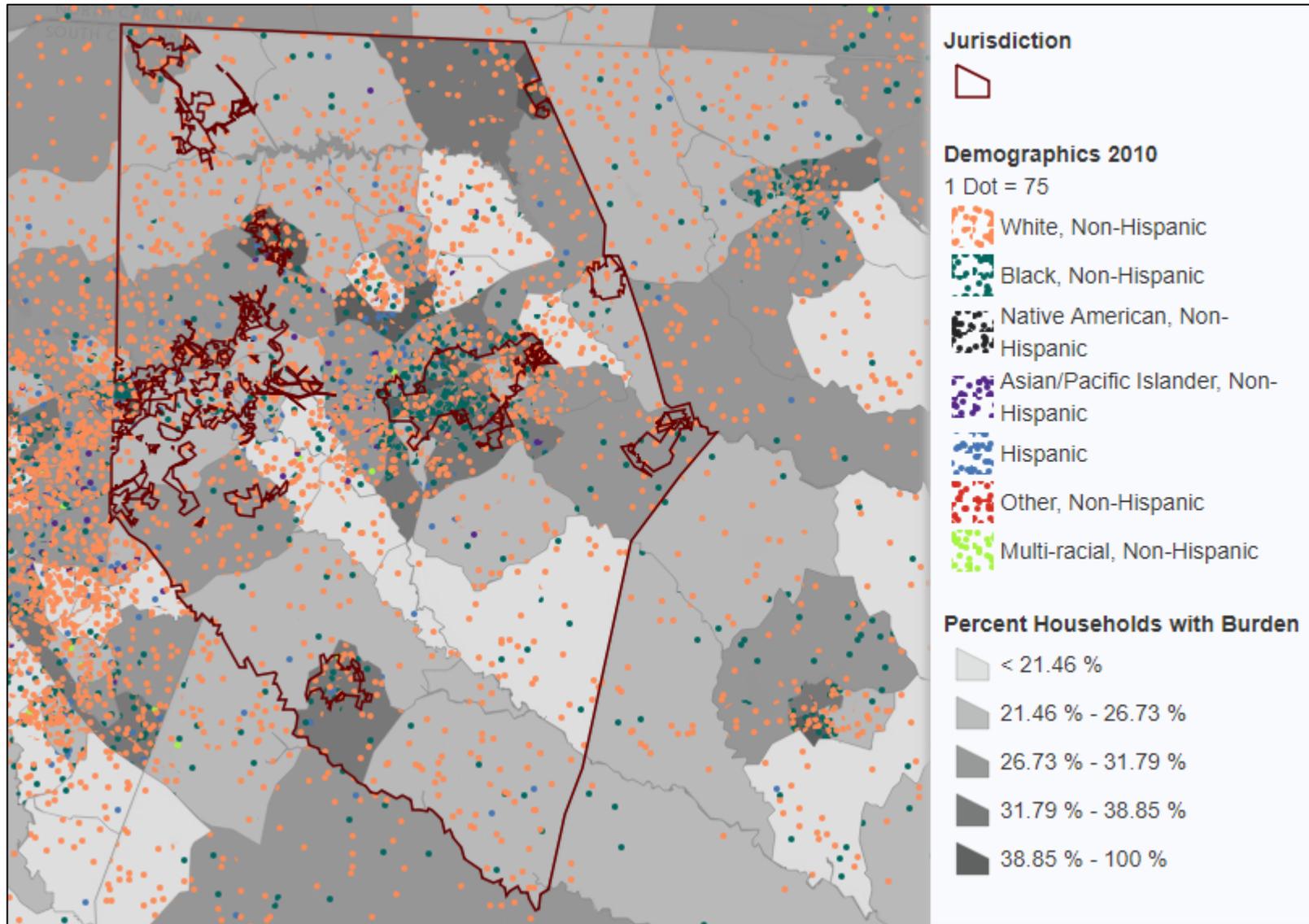
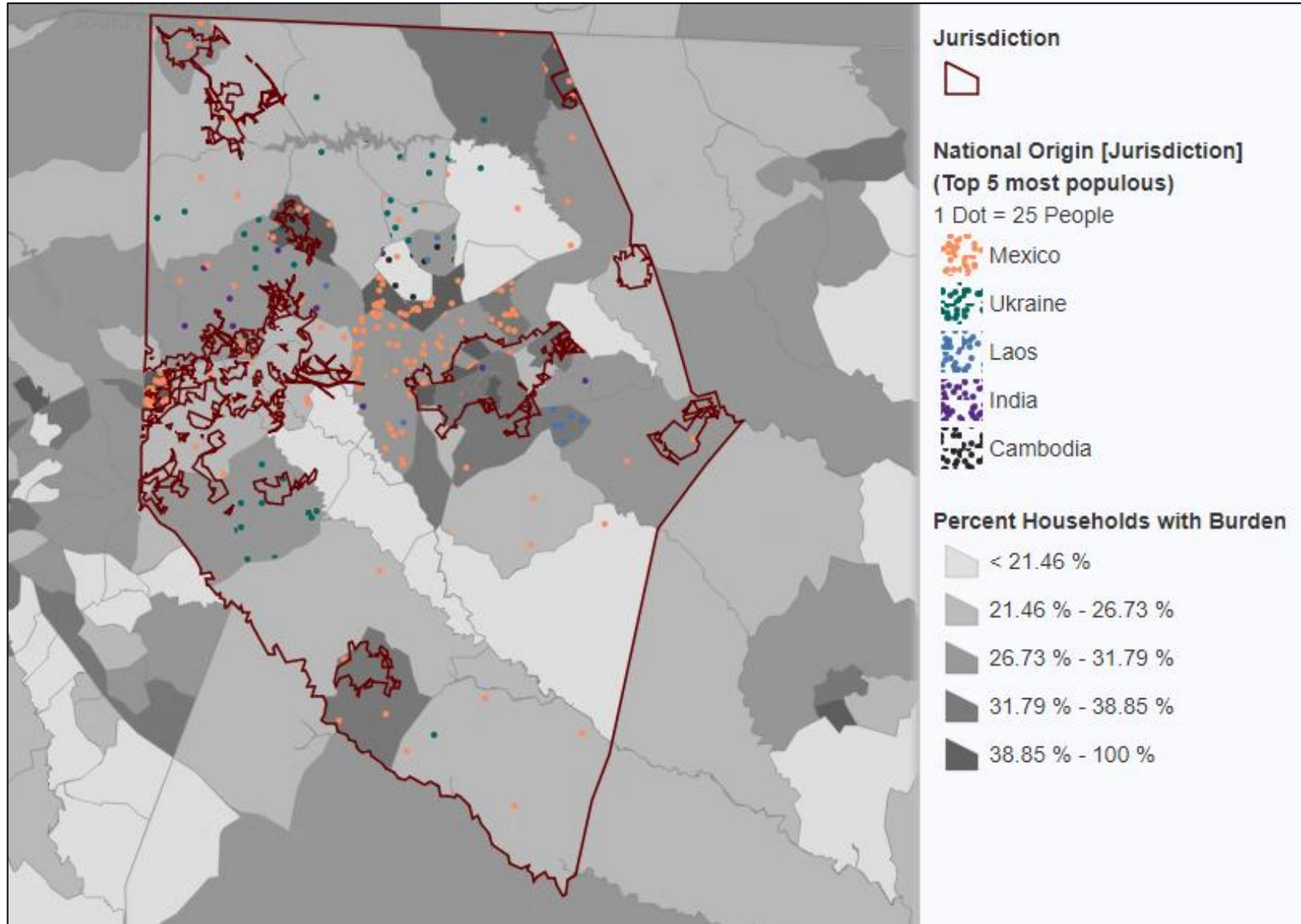


FIGURE 38. HOUSING BURDENS AND NATIONAL ORIGIN IN THE CITY OF SPARTANBURG



FIGURE 39. HOUSING BURDENS AND NATIONAL ORIGIN IN SPARTANBURG COUNTY



HOUSING SIZE

Table 7 provides information for households living in publicly supported housing, including unit size and presence of children by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number of households with children does not immediately indicate overcrowding in assisted housing. Theoretically, the 246 households with children who live in public housing properties could be housed in the 329 units with two or more bedrooms. Likewise, there are adequate units with two or more bedrooms for the 203 households with children living in project-based Section 8 units and the 412 that participate in the housing choice voucher program.

However, because data about households with children by household size is not available, precise conclusions regarding the suitability of the existing publicly supported housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernible without information about household size.

TABLE 7. PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: UNITS BY NUMBER OF BEDROOMS AND NUMBER OF CHILDREN

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
City of Spartanburg								
Public Housing	238	41.3%	209	36.2%	120	20.8%	246	42.6%
Project-Based Section 8	375	62.2%	93	15.4%	128	21.2%	203	33.7%
Other Multifamily	25	100.0%	0	0.0%	0	0.0%	N/A	N/A
HCV Program	142	19.2%	296	40.0%	273	36.9%	412	55.8%
Spartanburg County								
Public Housing	19	51.3%	0	0.0%	0	0.0%	N/A	N/A
Project-Based Section 8	0	0.0%	0	0.0%	0	0.0%	N/A	N/A
Other Multifamily	163	93.1%	0	0.0%	0	0.0%	N/A	N/A
HCV Program	158	14.1%	440	39.4%	459	41.1%	609	54.5%

Data Source: APSH

HOMEOWNERSHIP AND LENDING

In the city, the majority of owner households are white (65.4%), followed by African-American (31.7%), and Hispanic (1.5%) households. Other groups are less than 1%. For renter households, the majority are African-American (59.3%), followed by white (35%) households. Asian-American, Hispanic, and Other groups each comprise 1.8% of renters in the city. Comparing these percentages to the overall percentage of population in the demographic overview data in Table 1 indicates which groups have higher or lower rates of home ownership relative to their share of the total population. Whites make up 45.9% of the total population, indicating a high rate of ownership relative to their population. African Americans make up 47.3% of the total population, indicating a low rate of ownership relative to their population.

In Spartanburg County, whites have an even larger share of ownership (84.3%) than in the city, though their overall share of the population is higher as well. Whites make up 74.3% of the total population, indicating a high rate of ownership relative to their population, though the difference in the rate is less than in the city. African American households make up 10.6% of owner households. This indicates a low rate of ownership relative to their share of the population (15.9%). Although this share of home owner households is much less than that of African Americans in the city, it is important to note that the African-American population share is much lower than in the city as well. Hispanic households make up a slightly larger share of owner households in the county (1.5%) than in the city (2.6%), but these numbers are still below their total share of the population (3.5% and 5.9%, respectively). Patterns in the region are similar to those in the county.

Another way of evaluating homeownership by race and ethnicity is to use the data in Table 8 to calculate the ownership rate of each group, which shows that some groups are significantly less likely to be homeowners than whites. In the City of Spartanburg, about two-thirds of white households own their homes, compared to about a third of African-American, Native American, and Asian households. About half of Hispanic households own their homes. In Spartanburg County, as homeownership rates increase across all groups, the patterns of homeownership change. 95% of the very small Native American households own their homes, followed by 80% of white households. Lowest rates of home ownership are found among African Americans (52%) and Hispanic (50%) households. These patterns are similar to those in the entire region.

The maps that follow show the share of owners and renters by census tract. In the City of Spartanburg, tract 21302 in the eastern portion of the city has the highest percentage of homeowners (91.1%). Rental households are most prevalent in the central city, and in tracts to the south and west and tract 20800, just southwest of downtown, had the lowest percentage of homeowners in the city (14.4%)

In Spartanburg County, renters are clustered in the urban areas, and rural areas show higher rates of homeownership. Outside of the City of Spartanburg, the highest percentage of rental households is found in tract 21802 just north of the Spartanburg city limits. The highest ownership percentage is found in tract 23001 (92.7%) in the area north of Duncan, Lyman, and Wellford.

TABLE 8. HOMEOWNERSHIP AND RENTAL RATES BY RACE / ETHNICITY

Race/Ethnicity	City of Spartanburg				Spartanburg County				Spartanburg Region			
	Owners		Renters		Owners		Renters		Owners		Renters	
	#	%	#	%	#	%	#	%	#	%	#	%
Non-Hispanic												
White	5,290	65.4%	2,590	35.0%	50,130	84.3%	12,345	61.0%	67,270	80.7%	19,215	53.7%
Black	2,565	31.7%	4,390	59.3%	6,329	10.6%	5,813	28.7%	12,380	14.9%	13,505	37.7%
Asian	70	0.9%	135	1.8%	900	1.5%	323	1.6%	1,070	1.3%	530	1.5%
Native American	15	0.2%	25	0.3%	210	0.3%	10	0.1%	235	0.3%	45	0.1%
Other	30	0.4%	130	1.8%	388	0.6%	200	1.0%	485	0.6%	475	1.3%
Hispanic	120	1.5%	130	1.8%	1,540	2.6%	1,529	7.6%	1,945	2.3%	2,045	5.7%
Total	8,085	-	7,400	-	59,490	-	20,235	-	83,390	-	35,815	-

Note: Data presented are number of households, not individuals.

Source: HUD "A Picture of Subsidized Households" Data

FIGURE 40. SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITY OF SPARTANBURG



FIGURE 41. SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITY OF SPARTANBURG



FIGURE 42. SHARE OF HOUSEHOLDS THAT ARE RENTERS IN SPARTANBURG COUNTY

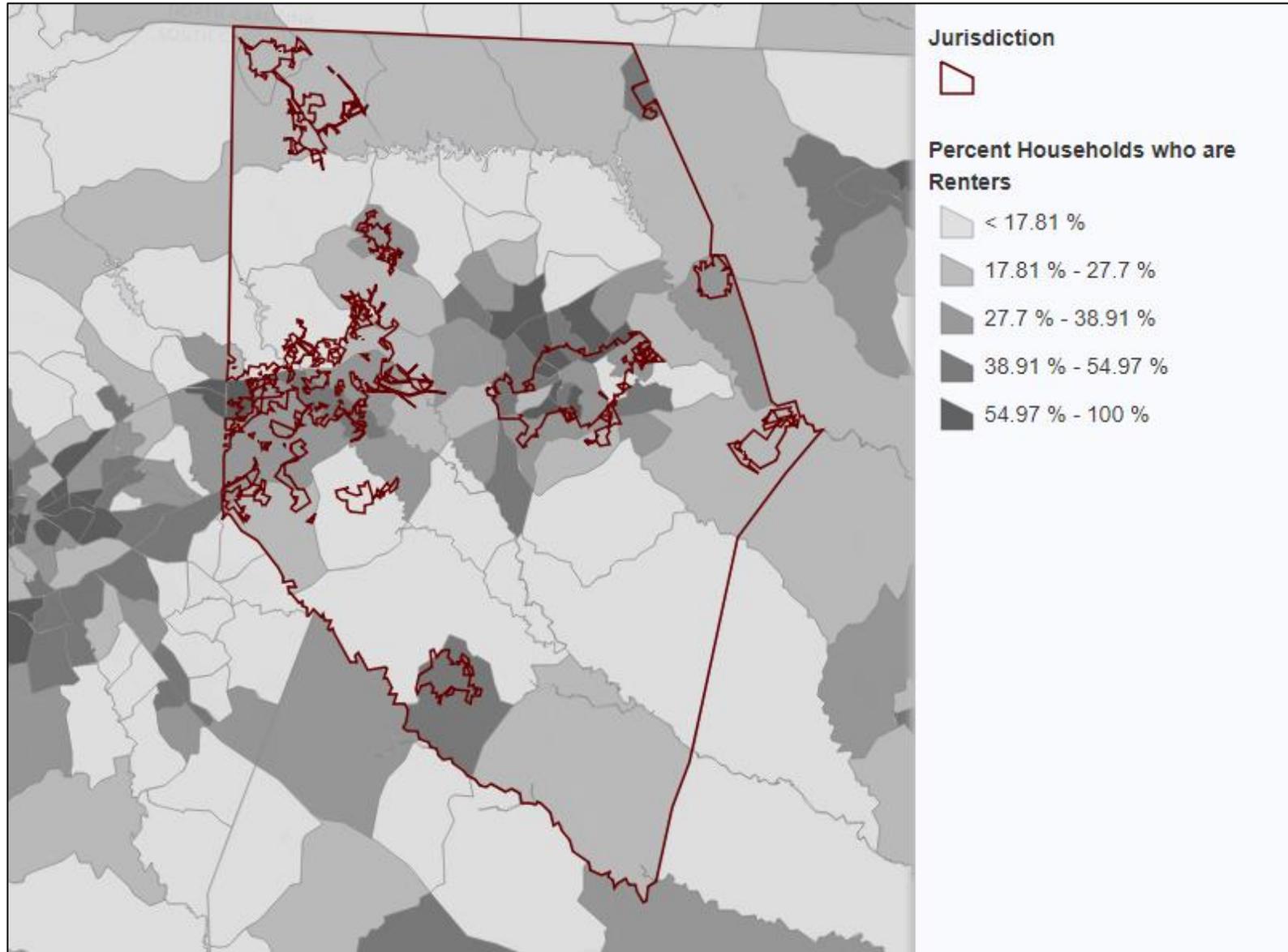
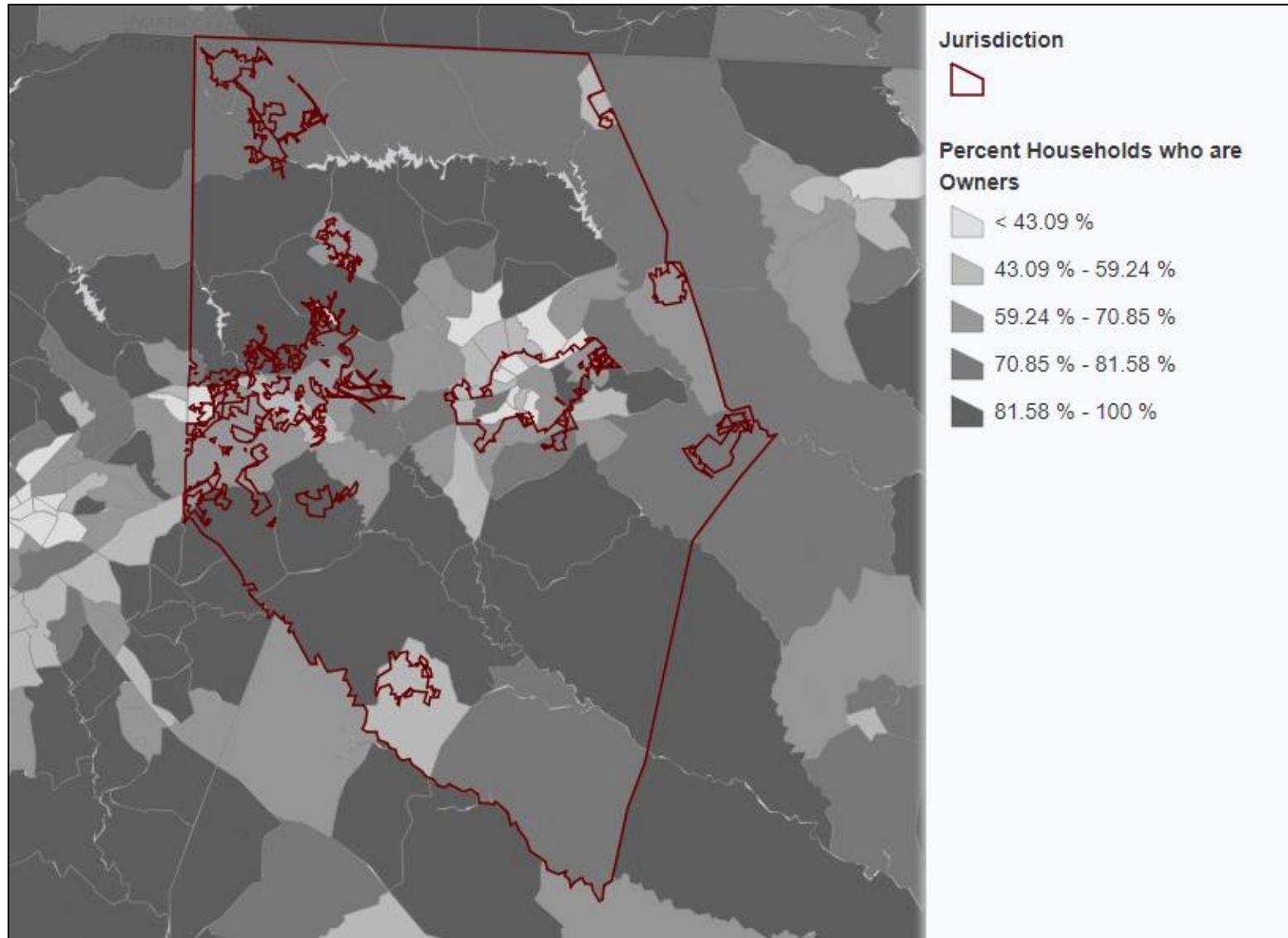


FIGURE 43. SHARE OF HOUSEHOLDS THAT ARE OWNERS IN SPARTANBURG COUNTY



Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.⁹ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is HMDA data for Spartanburg County (including the City of Spartanburg) for 2013 to 2017, which includes a total of 28,120 home purchase loan application records and 21,789 mortgage refinance application records.¹⁰ Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 41% of home purchase loan denials and 37% of refinance loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.¹¹ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with fair lending laws.

⁹ Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

¹⁰ Includes applications for the purchase or refinance of one-to-four family dwellings, including manufactured homes, in which the property is or will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as a first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

¹¹ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. “The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act.” Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

Complete information regarding applicant race, ethnicity, and income is available for 25,281 home purchase loan applications in Spartanburg County (89.9% of the total loan records). Most applicants were white (80.3%); Black households made up 12.6% of the applicant pool, Latino households made up 4.6%, and Asian households comprised 1.9%. These shares are roughly inline with the breakdown of the county's population by race and ethnicity, although people of color make up a somewhat lower share of loan applicants (19.7%) than the overall population (25.7%). The table on the following page shows loan approval rates for completed loan applications by race and ethnicity at various income levels.¹² Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

At low incomes, loan denial rates differed by race and ethnicity, ranging from 26.5% for white and Asian applicants to 34.4% for Latino applicants, 39.1% for Black applicants, and 39.7% for applicants of other races. At middle incomes, disparities persist between some racial and ethnic groups. About 15-16% of white and Latino applicants were denied a home loan, while denial rates for Black and other race applicants were somewhat higher (23.1% and 34.1%, respectively). At the highest income level, denial rates about one-tenth of applications by white households were denied (10.2%), while denial rates were higher for every other group. They ranged from 14.7% for high-income Latino applicants to 23.4% for high income Black applicants. Overall, disregarding income, 17.6% white applicants were denied a home loan compared to 28.6% of applicants of color. African American and other race applicants had the greatest disparity in lending access, with overall home purchase loan denial rates of 30.7% and 32.6%, respectively.

The table also provides data for home refinance loan applications. Information regarding race, ethnicity, and income is available for 16,809 refinance applications, or 77.1% of the total refinance applications in Spartanburg County. This data also shows some disparity in denial rates by race and ethnicity. Denial rates for white applicants range from about 24 to 40%, depending on income. At each income level, households of color have higher refinance loan denial rates than white applicants. At the low income level, refinance loan application denial rates for households of color ranged from 57.5% for Asians to 63.9% for other race households, all well-above the denial rate of 39.7% for whites. At middle incomes, denial rates are closer: 32.5% for white applicants, rates in the mid 30s for Asian and Latino applicants, and 47.9% for African Americans. At high incomes, white applicants had a denial rate of 24.7%, while rates for households of color ranged from 31.5% for Asians to 41.7% for African Americans. Overall, applicants of color were denied refinance loans at a rate that was 1.6 times that of white applicants (31.0% versus 48.2%). Black and other race applicants had the highest overall denial rates at 51.3% and 46.2%, respectively.

¹² The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

TABLE 9. LOAN APPROVAL RATES BY RACE AND ETHNICITY IN SPARTANBURG COUNTY, 2013 – 2017

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	6,594	1,309	170	63	485	8,621
	Denial Rate	26.5%	39.1%	26.5%	39.7%	34.4%	29.0%
Middle Income	Completed Applications	4,863	858	95	44	290	6,150
	Denial Rate	15.6%	23.1%	11.6%	34.1%	16.2%	16.7%
High Income	Completed Applications	6,549	602	138	34	204	7,527
	Denial Rate	10.2%	23.4%	21.0%	17.6%	14.7%	11.6%
All Applicants	Completed Applications	18,006	2,769	403	141	979	22,298
	Denial Rate	17.6%	30.7%	21.1%	32.6%	24.9%	19.7%
Home Refinance Loans							
Low Income	Completed Applications	3,310	703	87	36	160	4,296
	Denial Rate	39.7%	59.6%	57.5%	63.9%	51.9%	44.0%
Middle Income	Completed Applications	2,992	420	62	34	111	3,619
	Denial Rate	32.5%	47.9%	35.5%	38.2%	34.2%	34.4%
High Income	Completed Applications	5,207	456	108	36	125	5,932
	Denial Rate	24.7%	41.7%	31.5%	36.1%	32.8%	26.3%
All Applicants	Completed Applications	11,509	1,579	257	106	396	13,847
	Denial Rate	31.0%	51.3%	41.2%	46.2%	40.9%	33.9%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The table on the following page identifies reasons for denials by applicant race and ethnicity. A reason was provided in about 65% of home purchase loan denials and 64% of refinance loan denials. For purchase loans, credit history, which speaks to a household’s overall long-term ability to repay loans, was the most common denial reason for white, Black, Asian, and Latino applicants (triggering between 22% and 34% of denials). Debt to income ratio, collateral, and incomplete credit applications were also common denial reasons regardless of race and ethnicity. For refinance loans, credit history, debt to income ratio, and collateral were also common reasons for denials regardless of applicant race and ethnicity.

While data regarding reasons for loan denials may provide relevant data to help financial counseling agencies better serve first time homebuyers, it does not show strong differences by race and ethnicity.

TABLE 10. REASONS FOR LOAN DENIAL BY APPLICANT RACE AND ETHNICITY IN SPARTANBURG COUNTY, 2013-2017

Reason for Denial	Applicant Race and Ethnicity					All Applicants
	Non-Latino				Latino	
	White	Black	Asian	Other		
Home Purchase Loans						
Denial reason provided	67.8%	61.3%	72.9%	39.1%	57.4%	65.8%
Collateral	7.6%	4.2%	10.6%	2.2%	7.0%	6.9%
Credit application incomplete	13.2%	8.1%	5.9%	2.2%	7.0%	11.6%
Credit history	31.4%	32.7%	34.1%	8.7%	22.1%	31.0%
Debt to income ratio	12.3%	15.7%	21.2%	10.9%	13.9%	13.2%
Employment history	3.2%	2.8%	3.5%	4.3%	7.8%	3.4%
Insufficient cash	4.5%	3.9%	3.5%	6.5%	8.2%	4.6%
Mortgage insurance denied	0.1%	3.2%	1.2%	0.0%	0.0%	0.7%
Other	5.1%	6.5%	8.2%	6.5%	6.1%	5.5%
Unverifiable information	2.0%	2.0%	2.4%	8.7%	3.3%	2.2%
Reason not provided	32.2%	38.7%	27.1%	60.9%	42.6%	34.2%
Total denials	3,174	851	85	46	244	4,400
Home Refinance Loans						
Denial reason provided	63.8%	62.1%	71.7%	55.1%	68.5%	63.8%
Collateral	17.6%	13.7%	17.0%	10.2%	18.5%	16.9%
Credit application incomplete	9.5%	6.3%	9.4%	16.3%	6.8%	8.9%
Credit history	21.9%	26.4%	18.9%	14.3%	19.1%	22.4%
Debt to income ratio	12.9%	13.2%	24.5%	10.2%	17.9%	13.4%
Employment history	0.6%	0.6%	1.9%	0.0%	1.2%	0.6%
Insufficient cash	3.0%	2.8%	4.7%	0.0%	4.3%	3.0%
Mortgage insurance denied	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%
Other	8.2%	8.9%	6.6%	6.1%	7.4%	8.3%
Unverifiable information	3.0%	1.6%	3.8%	2.0%	4.9%	2.9%
Reason not provided	36.2%	37.9%	28.3%	44.9%	31.5%	36.2%
Total denials	3,570	810	106	49	162	4,697

Note: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”¹³ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore (I) how South Carolina state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the City of Spartanburg and Spartanburg County’s Unified Land Management Ordinance (ULMO) impact housing affordability and fair housing choice within those borders.

Intersection of Local Zoning and Land Use with Federal and State Fair Housing Laws

One goal of zoning and similar land use regulations is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.¹⁴ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the South Carolina Fair Housing Law, the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. *See* H.R. Rep. No. 100–711, at 24 (1988), reprinted in 1988 U.S.C. C.A.N. 2173, 2185 (showing that Congress’ intent was that the amendments “would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps”). In a recent landmark disparate impact case under the FHA, the

¹³ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

¹⁴ Local government power to regulate land use derives from the state’s expressly delegated police power. The Local Government Comprehensive Planning Enabling Act of 1994 replaced the 1967 Act and repealed prior statutes and required all local comprehensive plans, zoning and land development ordinances conform to the 1994 Act by December 31, 1994. The 1994 Act, with subsequent amendments, is codified at S.C. Code Title 6, Chapter 29.

Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. *Tex. Dep't of Hous. & Cmty. Affairs v. Inclusive Cmty. Project, Inc.*, 135 S.Ct. 2507, 2521-2522 (2015) (citing multiple published court opinions involving challenges to local zoning and land use decisions and stating: "Suits targeting such practices reside at the heartland of disparate-impact liability.") Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments. *See, e.g., Howard v. City of Beavercreek*, 276 F.3d 802 (6th Cir. 2001) (finding Section 804(f)(3)(b) "creates an affirmative duty on municipalities . . . to afford its disabled citizens reasonable accommodations in its municipal zoning practices if necessary to afford such persons equal opportunity in the use and enjoyment of their property"); *Smith & Lee Assocs., Inc. v. City of Taylor*, 102 F.3d 781, 794-795 (6th Cir. 1996) (holding that city had violated the FHAA by failing to allow adult foster care homes to operate in areas zoned only for single-family neighborhoods).

In 1989, the South Carolina legislature passed the state's own fair housing protection in the South Carolina Fair Housing Law. The Law prohibits discrimination in relation to sale or rental of property, the listing of property for sale or rent, and in activities related to residential real estate transactions such as financing, appraisals, and other similar related activities. The Fair Housing Law protects persons on the basis of race, color, religion, sex, familial status, national origin, or disability.

The state's fair housing law is enforced through the South Carolina Human Affairs Commission (SCHAC), and the complaint procedures are set out in South Carolina Code Chapter 65. Complaints must be filed within 180 days from the date of the discriminatory practice. After a complaint is filed, the Commission has the power to investigate the alleged violation, and if a violation is found, a complaint form will be filed. The Commission may attempt mediation. If there is no settlement, and there are reasonable grounds, other enforcement options include civil action, administrative hearing by a panel of SCHAC members, or a suit in State court. The SCHAC also offers training, outreach, and education to the public about the Fair Housing Law.

Neither the City of Spartanburg nor Spartanburg County has adopted its own separate fair housing ordinance.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies in the city and county of Spartanburg that protect and advance fair housing choice for all.

City of Spartanburg Zoning and Spartanburg County Unified Land Management Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The City's and County's treatment of these types of issues are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning ordinance of the City of Spartanburg and the Spartanburg County Unified Land Management Ordinance (ULMO) were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the code may impact housing opportunities for persons with disabilities. The ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the City's and County's scores for each issue. A complete report for each jurisdiction, including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 11. ZONING AND ULMO RISK SCORES

Issue	Risk Score City of Spartanburg	Risk Score Spartanburg County
1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	2	2
1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?		
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?	2	1
2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?		
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	2	2
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?		
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	2	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	3	2
6a. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	1	1

7. Does the ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?	1	1
7b. Do multi-family districts restrict development only to low-density housing types?		
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2	1
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning or land use ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction?	1	1
9b. Is there any provision for monitoring compliance?		
10. Does the zoning or land use ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2	2
Average Risk Score	1.8	1.4

The City's total average risk score (calculated by taking the average of the 10 individual issue scores) is 1.8, indicating that overall there is moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. The City received a "3" (high risk) score on two issues (#5) and also received a "2" (medium risk) score on certain issues where the zoning regulations have the potential to negatively impact fair and affordable housing. The County's cumulative scores averaged to 1.4 or low to moderate risk. It did not receive a "3" (high risk) score on any specific issue but did receive several "2" (medium risk) scores. These medium and high risk scores could indicate the local governments may be vulnerable to fair housing complaints where the ordinance is applied in a way that impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the area's residents and to better fulfill the mandate to affirmatively further fair housing.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The code analysis matrix developed for this report and the narrative below are not designed to assert whether the City's and County's codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning and land use ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning and Land Use Regulations on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.¹⁵ Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning or land use regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

The City of Spartanburg's design standards, density allowances, and housing-type diversity do not appear facially exclusionary, and the City received "1/low risk" score for Issue 6 and Issue 7 regarding exclusionary zoning regulations for single and multifamily housing types. While the zoning ordinance may impact the feasibility of developing affordable housing in some cases, on the whole the code provides for lot sizes and densities that could accommodate affordable housing. But there are recommendations for how the City could use more flexible zoning and land use policy to support investment in its affordable housing stock.

The zoning code and map divide the City's residential districts with minimum single-family lot sizes ranging from 15,000 sq. ft. per unit in the R-15 district; 12,000 sq. ft. in the R-12 district; 8,000 sq. ft. in the R-8 and R-8 SFD districts, and 4,000 sq. ft. in the R-6 district. Two-family units are allowed in all these districts

¹⁵ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index (2007), available at real.wharton.upenn.edu; Randal O'Toole, The Planning Penalty: How Smart Growth Makes Housing Unaffordable (2006), available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, The Impact of Zoning on Housing Affordability (2002), available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's Housing Development Toolkit, 2016, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20of.2.pdf.

except R-15 and R-8 SFD districts with somewhat smaller area per dwelling unit. PDDs (Planned Development Districts) permit single family and a variety of multiple uses and housing types depending on the base zoning. PDDs use the base zoning districts described above, but minimum lot areas are reduced, and there are opportunities for further density bonuses. However, planned communities do require additional design requirements, permitting and review processes compared to traditional residential zoning.

There are no floor area ratio or minimum livable floor area standards. Parking requirements are the same across all zoning districts, a minimum of two spaces per dwelling unit, except for elderly/retired duplex or multifamily, which requires one space per dwelling unit. The zoning map shows that the smallest lot residential district, R-6, is fairly common, as is R-8, which allows smaller lot duplexes.

Multifamily dwellings are allowed in the R-8 and R-6 districts. In addition, several commercial districts, B-1, B-3, and B-4, allow multifamily dwellings along with mixed-use buildings (commercial uses on ground floor with multifamily dwellings above). Density is limited by a minimum lot area per dwelling unit with a minimum of 7,000 for R-12, 5,000 for R-8, 2,500 for R-6, 1,500 for B-1, and 750 for B-3 and B-4. The residential districts allow only medium density because of the relatively low minimum lot size per unit requirements. However, allowable density is much higher in the commercial districts. Building coverage is limited to 40% in R-12 and 50% in R-8, R-6, and B-1. Height limits (2.5 stories in R-8 and 35 in B-1) may further limit density.

Minimum project areas for multifamily range from none for B-3 and B-4, two acres for R-8, R-6, and B-1, and four acres for R-12. This could present a challenge to develop small projects because although individual lots may be smaller than the minimum project area, enough land must be assembled to meet the minimum project area. For example, to develop a duplex project in the R-6 district, two acres are required, even though a single duplex only requires less than a quarter of an acre.

There is a form-based code in place in downtown Spartanburg. It provides opportunity for lower development costs by allowing for greater building height, reduced setbacks, and no regulation on lot size per unit. However, despite the focus on creating a walkable environment, parking requirements are not reduced. Furthermore, additional building and design requirements may offset the cost reductions somewhat.

In Spartanburg County, there is not zoning per se, but the Unified Land Management Ordinance (ULMO) sets standards for allowable uses and intensities throughout unincorporated areas. The ULMO provides minimum lot sizes in areas with public sanitary sewer service (8,000 sq. ft). Density in areas without sanitary sewer service is as required by the South Carolina Department of Health and Environmental Control, presumably larger. Density for multi-family housing is determined by street type, with 8 units allowed on minor streets, 12 units on collectors, and unlimited density on arterials. County regulations allow for other housing types such as townhouses and duplexes with minimal restrictions. The County scored a "1" (low risk) on issues 6 and 7 regarding exclusionary zoning and restrictive development standards.

As for Issue 8 regarding alternative affordable housing types, the City of Spartanburg permits manufactured housing but only in certain areas. Accessory dwelling units (ADUs) are not expressly defined

in the zoning ordinance. Staff has interpreted the code to allow ADUs along with all accessory buildings, which are permitted in residential districts so long as they meet dimensional standards. For example, accessory buildings in general are limited to 30% of the rear yard. However, ADUs are not listed as a permitted use, and neither “accessory building” nor “ADU” is defined. Since uses not permitted are prohibited per Section 501.1, the code could be interpreted not to allow ADUs. Including definitions for these terms or explicitly adding language for ADUs would clarify this. Within the downtown code a “Secondary Dwelling” (accessory dwelling unit) is permitted. A Secondary Dwelling unit must be located in the rear yard, may not exceed 500 sq. ft. or 25% of the gross floor area of the main structure and must share a single set of utility connections with a principal building. The owner must occupy the primary dwelling unit.

In Spartanburg County, residential designed manufactured homes are allowed in any location. Standard manufactured homes are allowed in more restricted areas. An accessory dwelling unit is allowed as long as it is no greater than 1/3 of the floor area of the primary structure.

Exclusionary zoning can happen on a continuum and in the City of Spartanburg the jurisdictions could do more to use their zoning and land use policies to further remove artificial barriers to development of and access to affordable housing across all residential zones. For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be further reduced and minimum project area standards repealed; accessory dwellings units could be defined and permitted outside just the downtown code area; off-street parking requirements reduced, particularly in downtown; and height restrictions relaxed to allow for more density on the same footprint.

All together, these tools could potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Moreover, the City’s and County’s land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). Currently, the City of Spartanburg and Spartanburg County have not adopted specific development incentives like reduced parking, design waivers, variances, or expedited permitting for the development of affordable or low-income housing or housing for protected classes. The PDD zoning district allows a density bonus, but there is no requirement for affordability, and based on the other requirements for PDDs these projects are likely not to be affordable.

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

SUPPLY AND OCCUPANCY

According to its 2017 Annual Public Housing Authority Plan, the Spartanburg Housing Authority (SHA) owns and operates 720 public housing units, serving low-income, very low-income, and extremely low-income families in the City of Spartanburg and Spartanburg County. In addition, SHA manages 2,290 vouchers under the Housing Choice Voucher Program, allowing tenant households to pay affordable rents at units of their choice throughout the area. HUD’s public housing data for the Spartanburg region appearing in the table below diverges from SHA’s figures, perhaps due to SHA’s transition of its entire public housing unit portfolio under the Rental Assistance Demonstration (RAD) program. Many of those converted units result in Project-based Section 8 vouchers, of which there are currently 622 in use in the City of Spartanburg.

Taken together, these publicly supported housing programs reported in HUD’s data account for over 11% of the housing units in the City of Spartanburg and 1.5% in Spartanburg County. However, because the programs are all rent-based, the share of rental units in the city supported in some form by a public subsidy is considerably higher, about 22%, compared with about 5% of the county’s rental units.

TABLE 12. PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	City of Spartanburg		Spartanburg County	
	#	%	#	%
Total housing units	17,366	-	91,124	-
Public housing	592	3.4%	50	0.1%
Project-based Section 8	622	3.6%	N/A	N/A
Other multifamily	14	0.1%	181	0.2%
HCV program	718	4.1%	1,092	1.2%

Source: Decennial Census; HUD’s “A Picture of Subsidized Households” Data

Based on the demographic data presented earlier in this analysis, the City of Spartanburg’s population is 47.3% Black. Given that figure, Black households are overrepresented in all major forms of publicly supported housing in the city, making up 92.3% of voucher holders and 84.3% of public housing tenants. Occupancy in the city’s Project-Based Section 8 units, where 64.6% were occupied by Black households, comes closest to the proportional share of the Black population in the city. In the county, the largest share of the population (74.3%) is white and whites in the county make up a somewhat more proportional share of publicly supported housing there: 61.1% of public housing tenants and 51.3% of the occupants of “other multifamily” housing. However, as in the city, whites are again dramatically underrepresented among voucher holders, making up just 16.3% of that group.

Comparing population shares by income, in all low-income bands (0-30%, 0-50%, and 0-80% AMI), African American households are overrepresented, both in the city and county. However, they are not overrepresented to the same degree that they reside in publicly supported housing. This indicates that African Americans have a greater financial need than white residents, but even accounting for this, access publicly supported housing units at a disproportionately high rate. In the county (but not the city) Latino households are overrepresented in all low-income bands as well. This indicates that Latino households, while having a greater proportional need for the affordability of publicly supported housing, obtain such units at disproportionately low rates.

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TABLE 13. PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE/ETHNICITY

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of Spartanburg								
Public Housing	78	13.9%	472	84.3%	8	1.4%	1	0.2%
Project-Based Section 8	200	34.0%	380	64.6%	7	1.2%	1	0.2%
Other Family	16	72.7%	6	27.3%	0	0.0%	0	0.0%
HCV Program	47	6.6%	663	92.3%	8	1.1%	0	0.0%
0-30% AMI	715	22.8%	2,220	70.9%	25	0.8%	55	1.8%
0-50% AMI	1,385	26.0%	3,525	66.1%	44	0.8%	80	1.5%
0-80% AMI	2,715	35.2%	4,470	58.0%	77	1.0%	143	1.9%
Total Households	7,885	50.9%	6,950	44.9%	247	1.6%	213	1.4%
Spartanburg County								
Public Housing	11	61.1%	7	38.9%	0	0.0%	0	0.0%
Project-Based Section 8	N/A	N/A	0	0.0%	N/A	N/A	N/A	N/A
Other Family	80	51.3%	74	47.4%	2	1.3%	0	0.0%
HCV Program	174	16.3%	880	82.3%	12	1.1%	2	0.2%
0-30% AMI	5,193	66.7%	1,937	24.9%	424	5.4%	59	0.8%
0-50% AMI	9,656	58.2%	3,813	23.0%	948	5.7%	154	0.9%
0-80% AMI	18,987	65.7%	6,006	20.8%	1,395	4.8%	313	1.1%
Total Households	62,479	78.4%	12,122	15.2%	3,081	3.9%	1,204	1.5%
Spartanburg Region								
Public Housing	89	15.4%	479	82.9%	8	1.4%	1	0.2%
Project-Based Section 8	200	34.0%	380	64.6%	7	1.2%	1	0.2%
Other Family	96	53.9%	80	44.9%	2	1.1%	0	0.0%
HCV Program	319	14.0%	1,924	84.6%	25	1.1%	3	0.1%
0-30% AMI	7,415	51.7%	5,779	40.3%	615	4.3%	150	1.0%
0-50% AMI	14,050	49.6%	9,954	35.1%	1,155	4.1%	280	1.0%
0-80% AMI	27,650	57.9%	14,664	30.7%	1,834	3.8%	535	1.1%
Total Households	86,484	72.6%	25,893	21.7%	3,999	3.3%	1,610	1.4%

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; HUD's "A Picture of Subsidized Households" Data

TABLE 14. DEMOGRAPHICS OF PUBLICLY SUPPORTED HOUSING DEVELOPMENTS BY PROGRAM CATEGORY

Development Name	City of Spartanburg					
	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
Public Housing						
Prince Hall Apts	100	10%	90%	0%	N/A	79%
Camp Croft Courts	96	17%	82%	1%	N/A	39%
Victoria Garden Apts	80	6%	89%	4%	1%	79%
Spartanburg Southside Projects	110	1%	97%	1%	1%	69%
Gooch/Archibald Village	50	24%	73%	2%	N/A	2%
Cambridge Place	6	N/A	N/A	N/A	N/A	N/A
Archibald Rutledge	150	26%	70%	3%	N/A	N/A
Project-Based Section 8						
Spartanburg Arp Manor Apartments	56	71%	27%	2%	N/A	N/A
Benchmark Homes	24	83%	17%	0%	N/A	N/A
Heritage Court Apartments	148	73%	25%	1%	1%	N/A
Kensington Manor	124	18%	80%	2%	N/A	63%
JC Bull Apartments	100	7%	90%	2%	N/A	N/A
Crescent Hill (Spartanburg Terrace)	150	5%	93%	2%	N/A	85%
Woodland Apartments, Alp	20	N/A	N/A	N/A	N/A	N/A
Other HUD Multifamily Assisted Housing						
CLC Independent Living	0	N/A	N/A	N/A	N/A	N/A

Note: For LIHTC properties, this information will be supplied by local knowledge. Percentages may not add to 100 due to rounding error.

Data Sources: HUD's "A Picture of Subsidized Households" Data

TABLE 15. DEMOGRAPHICS OF PUBLICLY SUPPORTED HOUSING DEVELOPMENTS BY PROGRAM CATEGORY

Development Name	Spartanburg County					
	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
Public Housing						
Single Family Units	21	N/A	N/A	N/A	N/A	N/A
Country Garden Estates	10	N/A	N/A	N/A	N/A	N/A
Cedar Springs Place	19	58%	42%	0%	N/A	N/A
Other HUD Multifamily Assisted Housing						
Laurelwood, Inc of Spartanburg	20	70%	30%	0%	N/A	N/A
Newport	20	42%	53%	0%	N/A	N/A
CLC Sugar Ridge	12	64%	36%	0%	N/A	N/A
Pleasant Meadow Apts	48	89%	11%	0%	N/A	N/A
Capps Villa, Inc.	14	36%	64%	0%	N/A	N/A
CLC Supported Living	9	N/A	N/A	N/A	N/A	N/A
CLC Accessible Living	3	N/A	N/A	N/A	N/A	N/A
CLC Independent Living	20	70%	30%	0%	N/A	N/A

Note: For LIHTC properties, this information will be supplied by local knowledge. Percentages may not add to 100 due to rounding error.

Data Sources: HUD’s “A Picture of Subsidized Households” Data

The patterns of occupancy in city and county Public Housing locations are consistent with the above general patterns. Occupants are disproportionately African American at all complexes, in some cases, such as Spartanburg Southside Projects, this is true to a remarkable degree. While comprising 44.9% of the city’s households, 97% of the Southside Projects 110 units are occupied by Black households. In Project-based Section 8 units, there is more variation to the composition of specific properties. Three properties (Kensington Manor, JC Bull, and Crescent Hill) have 80% or more Black tenant households while three others (Arp Manor, Benchmark Homes, and Heritage Court) have white populations ranging from 71% to 83% when white households are 50.9% of the city’s general population. In the county’s Pleasant Meadow Apartments, 89% of the tenant households are white when the white share of county households is 78.4%. Capps Villa has a disproportionately Black population: 64% compared to 15.2% of the county’s households overall.

Many public comments, summarized in Chapter 2, considered factors related to segregation that could give rise to these individual properties having such different racial compositions. It is possible that subtle factors, such as the racial makeup of the client-facing front office staff, presence of nearby retail establishments serving specific ethnic preferences, and general community norms can lead to an initial racial imbalance forming. Once a rental community establishes an inclination toward white or Black residents, future residents may be guided – persuaded or dissuaded – from a particular property based on its racial makeup.

GEOGRAPHY OF SUPPORTED HOUSING

In the maps that follow, the locations of publicly supported housing developments are represented along with levels of Housing Choice Voucher use, which is indicated by gray shading. Superimposed over the map are also dots representing racial/ethnic demographics. The blue markers on the maps indicate the locations of public housing. Most of the area's public housing units are located within the City of Spartanburg, to the southwest side of Pine Street, and excluding the city's downtown. These tend to be in tracts with large shares of Black residents, ranging from 70% to over 93% African American. Two exceptions are Archibald Rutledge and Gooch/Archibald Village, which are in a more racially diverse tract with a white population of 43% and a Black population of 52%. Not coincidentally, these two properties also have the greatest degree of racial diversity among the public housing properties in the above tables. A couple of other public housing properties are located outside the City of Spartanburg. These include the Washington Road Apartments in Inman and Kelly Acres in Woodruff.

The orange markers on the map, indicating the locations of Project Based Section 8 units, are primarily located in the southern portion of the City of Spartanburg, many of them clustered together near existing public housing in that part of the city, but with three additional locations stretching further southwest toward the airport. As with the public housing units in Spartanburg, the locations of the Project Based Section 8 units are also tracts with higher than average numbers of Black residents. Outside the City of Spartanburg, there are additional Project Based Section 8 locations in Cowpens, Duncan, and Landrum.

Finally, with purple markers, the map also depicts the locations of Low Income Housing Tax Credit developments. The Low Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. While tending to be located in urban and suburban and not rural locations, the LIHTC units are the most widely distributed of all they types of fixed-unit subsidized housing. There are multiple locations in the City of Spartanburg, (though still none on the northeast side of Pine Street), suburban locations in the vicinity of Blackstock Road, and in many of the county's smaller communities, including Boiling Springs, Cowpens, Duncan, Greer, Inman, Landrum, Lyman, Wellford, and Woodruff.

The rates at which Housing Choice Vouchers (HCVs) are used are represented by the gray shading on the map. HCVs are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the other publicly supported housing types marked on the map, HCVs are portable and their distribution throughout the area is subject to fluctuate over time. The maps show that voucher use corresponds highly with neighborhoods with significant non-white, populations or in areas with a high degree of racial diversity. Portions of the City of Spartanburg where vouchers are least common are areas with primarily white populations. The greatest concentration of HCVs is found in a tract within the City of Spartanburg, west of downtown, between Wofford and Main Streets. In this area, nearly 43% of all housing units are rented using a voucher and over 87% of the population is non-white. Several other areas have voucher use rates in the 20% range,

most of them outside the City of Spartanburg. In the area around Creek Golf Club, voucher use accounts for 28% of all housing, a tract in Saxon has a voucher use rate of 24%, Roebuck 21% and south of the City of Spartanburg between Southport and Carolina County Club Road is another tract with a voucher use rate of 21%.

When the map of publicly supported housing locations is compared with the maps of opportunity index scores in Chapter 5 of this report, it is clear that different housing locations all carry with them different positive and negative opportunity attributes. The greatest concentrations of publicly assisted housing, including Project Based Section 8, Low Income Housing Tax Credit developments, and public housing units, are located in the southern and northwestern portions of the City of Spartanburg, both inside and just beyond the city limits. These properties tend to be located in areas with average access to proficient schools, good proximity to employment opportunities, some of the best public transit access, highest rates of poverty and low environmental quality. Though in somewhat different locations, areas with high HCV uses show similar patterns.

The SHA is in the process of converting all of its traditional public housing units into project-based vouchers under HUD's Rental Assistance Demonstration (RAD) program. This program delivers benefits to the housing authority related to increased operating autonomy and a greater ability to leverage the authority's assets to provide for the community's housing needs. The RAD program also benefits SHA's residents by converting fixed public housing units into unit-based vouchers that can be used to subsidize individual housing units in scattered locations throughout the service area. Under the RAD conversions, some SHA properties will be rehabilitated and the Project Based Vouchers will be used to subsidize the original rehabbed units in their existing locations; others will be demolished and the vouchers may then be placed at other properties elsewhere in the area. The SHA projects that through this program and the partnerships built with investors and fee developers through RAD, opportunities will be created to achieve greater diversity in the new developments. In one proposed project, the voucher-supported development will align with a hospital and school and will also use LIHTC financing with some units targeted to households with incomes up to 60% AMI. The greater diversity in income eligibility could be a catalyst for greater racial and ethnic integration.

Evaluating tradeoffs in access to opportunity is an important exercise because it demonstrates that no one neighborhood has all the markers of high opportunity – and neither are high scores on all the opportunity indices likely to be imperative for any one person or household. A family with children may opt for an affordable housing option in a neighborhood with access to better schools, even if it offers lower proximity to jobs and a longer, costlier commute. Conversely, a retiree who is no longer employed and does not have school-aged children may choose a neighborhood with many services nearby over one with good schools or jobs proximity. The relative concentration of the City of Spartanburg's public housing currently means that there may be somewhat limited options for the low- and moderate-income population residing at these properties, however, SHA's RAD initiative creates possibility for increasing access to opportunity.

FIGURE 44. PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITY OF SPARTANBURG

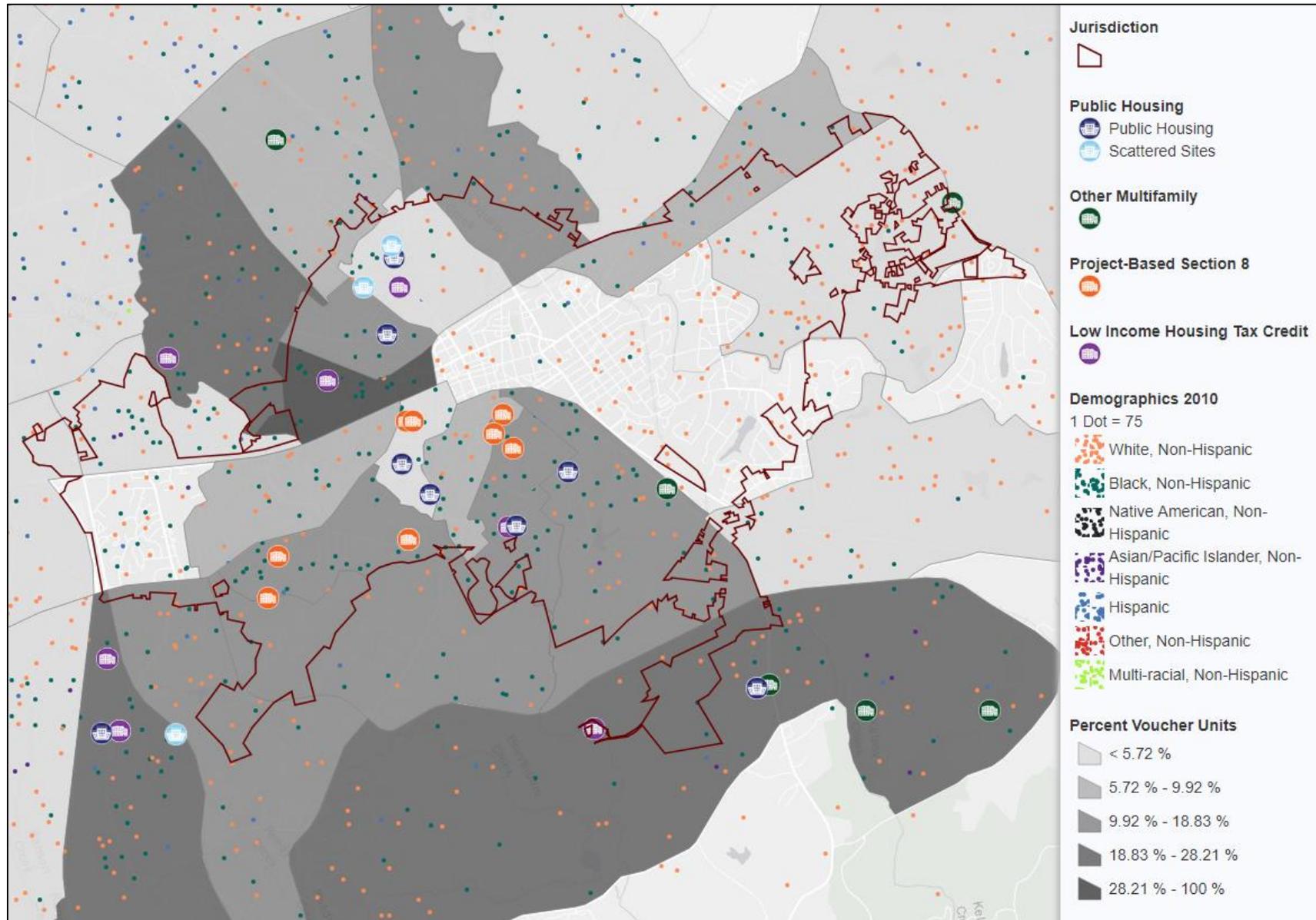
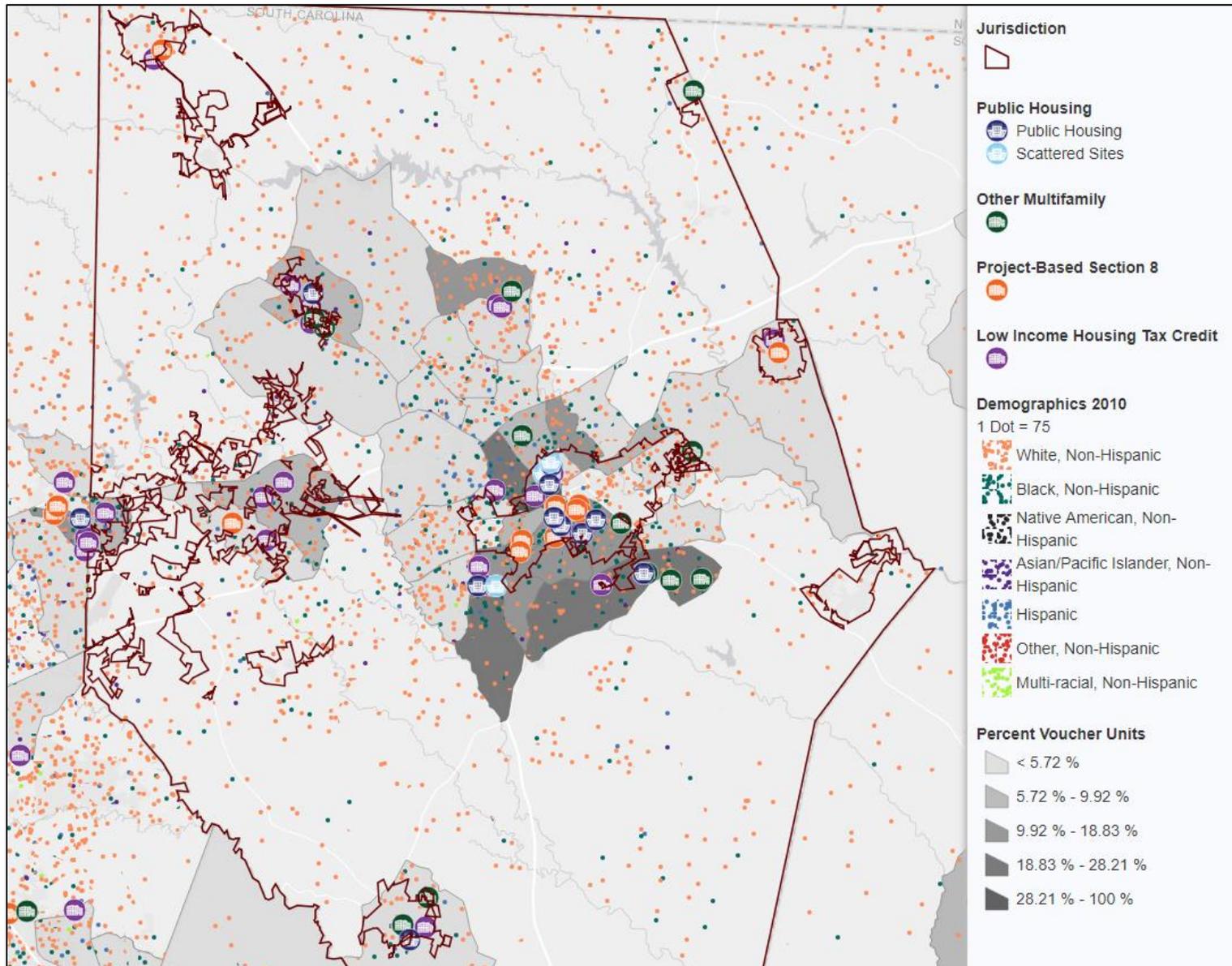


FIGURE 45. PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN SPARTANBURG COUNTY



POLICY REVIEW

As a public housing authority, the SHA is the entity responsible for administering nearly 2,300 Housing Choice Vouchers that are used in many neighborhoods throughout the Spartanburg region and the organization also owns 720 units of public housing distributed across several individual properties and locations. As required by HUD, the SHA maintains a comprehensive Five-Year PHA Plan, with annual plan updates, as well as other program-specific policies. The most pertinent of these policies for review in this analysis is the SHA's "Admissions and Continued Occupancy Policy", or ACOP and its Administrative Plan for the Housing Choice Voucher program. These documents set policy for who may be housed by the SHA and how those tenant households are selected. Three different aspects of the ACOP and/or Administrative Plan are examined here: tenant selection, local preference, and tenant screening. These three policy types all allow some degree of local determination by SHA and are among the most central to matters of fair housing choice.

Public housing, and particularly HCV assistance, is competitive and housing authorities often maintain lengthy waiting lists of potential tenants. The process by which applicants are ranked on and selected from a waiting list is guided by a tenant selection policy. For its voucher programs, SHA selects tenant applicants from its waiting list based first on the date and time of the submitted application, followed by the application of local preference criteria. Selection of public housing tenants from the SHA's waiting list is determined first by the date and time of the household's application, then by the size of unit required, and finally by any special preference criteria for which the household may qualify. A "date and time" standard for waiting list selection, which SHA uses for both public housing and HCVs, can be somewhat problematic for disadvantaging applicants who have inflexible, hourly work schedules or transportation and childcare challenges. When the waiting list is opened, families with these constraints may be less able to quickly access the application, gather documents necessary to complete it, and submit it once finished. SHA's order of selection policy in the ACOP does appear to allow for the use of a random selection process instead of one based on date and time. By randomizing applications for selection, waiting list families are provided more even footing and there is no advantage to a household that is able to access, complete, and submit an application more quickly than another.

HUD allows public housing authorities to, within narrow bounds, set local preferences for the applicants who will be selected from their waiting lists. Local preferences must be constructed carefully to avoid discrimination against protected classes but can be helpful tools to strategically adapt public housing programs to local housing needs and priorities as determined through data-driven planning processes. For both public housing and voucher programs, SHA applies local preference criteria at some point in the tenant selection process. In public housing, the preference criteria are set primarily to favor families who are involuntarily displaced from other housing, due to disaster, code enforcement action, SHA development plans, and the like. Other preferences are for working families and, for those seeking one-bedroom units, for people who are elderly, disabled, or handicapped.

The Administrative Plan's preference criteria for the voucher programs preserve some of the same criteria regarding working families and those who are involuntarily displaced. Households experiencing homelessness and veterans also receive preference. One of the strongest preference criteria is a preference for families that are current Spartanburg County residents. When narrowly tailored to a single

specific community, residency preferences can have the effect of limiting housing choice on a regional basis. However, in SHA's case, this preference being county-wide and applying to urban, rural, suburban, and a number of small-town communities, avoids this criticism as it allows for a great degree of mobility within the county to a variety of different communities with varying opportunity features.

Tenant screening, specifically policies regarding criminal background checks, is the final aspect of this review. Housing authorities are required to consider an applicant's criminal background as part of their screening process for public housing occupancy but must conduct the screening so as not to violate the prospective tenant's fair housing rights. For HCV programs, tenant screening is optional for the housing authority. Recognizing that people of color are disproportionately more likely to have experienced an encounter with the criminal justice system and to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory. Although criminal history is not a protected class, under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. Rather than blanket policies, exclusions of persons with criminal histories must be tailored to the housing provider's legitimate interests, be applied consistently to all applicants, and take into account the type of crime, time since conviction, and other factors.

While the ACOP, consistent with HUD regulations, requires SHA to conduct criminal background checks on all prospective public housing tenants and to deny applicants with records of specified criminal offenses, SHA's policy allows for reasonable discretion and consideration of special circumstances where permitted by regulation. consideration to factors which might indicate a reasonable probability of favorable future conduct. If the SHA's criminal background check leads to information that would be disqualifying, the SHA will notify the prospective tenant household and offer an opportunity for the tenant to dispute the accuracy and relevance of the information. The SHA also reserves the opportunity to offer consideration to the time, nature, and extent of the applicant's conduct, including the seriousness of the offense.

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.¹⁶

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.¹⁷

RESIDENTIAL PATTERNS

In the City of Spartanburg, an estimated 6,060 persons 5-years-old or older have a disability, representing 16.5% of the total population. People aged 18-64 have the highest disability rate 10.1% and the rate for those over 65 is 6.7%. In contrast, less than 1% of children between the ages of 5 and 17 are disabled. These rates of disability all track relatively closely with those of Spartanburg County and the region, an exception being that the rates of disability among children is slightly higher in the county and region, and the rates among other groups are slightly lower.

Ambulatory disabilities are the most common type in the city, county, and region, affecting 10.9%, 8.7%, and 9.6% of the populations, respectively. In the city and county, cognitive and independent living difficulties are the next most common. In the city, self-care difficulties are the next most common, while in the county, hearing difficulty is. In the region, difficulties following ambulatory from highest to lowest rate are cognitive, independent living, hearing, self-care, and vision. The map that follows shows the geographic distribution of persons with disabilities throughout the city and county. Areas where people with disabilities are most clustered include the area around Spartanburg Regional Medical Center and

¹⁶ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

¹⁷ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

Wofford College, where 20.7% of the population aged 18-64 has a disability and tract 21001, which had the highest percentage of the population above 64 years old with a disability (14.1%)

In Spartanburg County, tract 22303 (Chesnee) has the highest rate of population aged 18-64 with a disability outside the City of Spartanburg (15.4%), and tract 21401 had the highest rate of disability for the population over 64 (15.4%). The South Carolina School for the Deaf and Blind is located in Spartanburg County just outside the city limits of Spartanburg. Also in Spartanburg County, the Charles Lea Center provides services for men, women and children with intellectual disabilities and/or chronic medical conditions. It has more than 100 homes and apartments located throughout the County that are owned and/or managed by the Charles Lea Center. These range from apartments to nursing home level care and have a great variety of support levels.

TABLE 16. DISABILITY BY TYPE

Disability Type	City of Spartanburg		Spartanburg County		Spartanburg Region	
	#	%	#	%	#	%
Hearing difficulty	971	2.86%	7,996	3.99%	11,337	3.91%
Vision difficulty	1,064	3.13%	5,131	2.56%	8,132	2.80%
Cognitive difficulty	2,328	6.85%	11,982	5.97%	18,427	6.35%
Ambulatory difficulty	3,694	10.86%	17,394	8.67%	27,842	9.59%
Self-care difficulty	1,397	4.11%	6,174	3.08%	9,927	3.42%
Independent living difficulty	2,019	5.94%	11,841	5.90%	18,134	6.25%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: ACS

TABLE 17. DISABILITY BY AGE GROUP

Age of People with Disabilities	City of Spartanburg		Spartanburg County		Spartanburg Region	
	#	%	#	%	#	%
Age 5-17 with disabilities	322	0.95%	2,295	1.14%	3,395	1.17%
Age 18-64 with disabilities	3,450	10.14%	16,854	8.40%	26,787	9.23%
Age 65+ with disabilities	2,288	6.73%	11,565	5.77%	17,717	6.11%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: ACS

FIGURE 46. PEOPLE WITH A DISABILITY BY AGE IN THE CITY OF SPARTANBURG

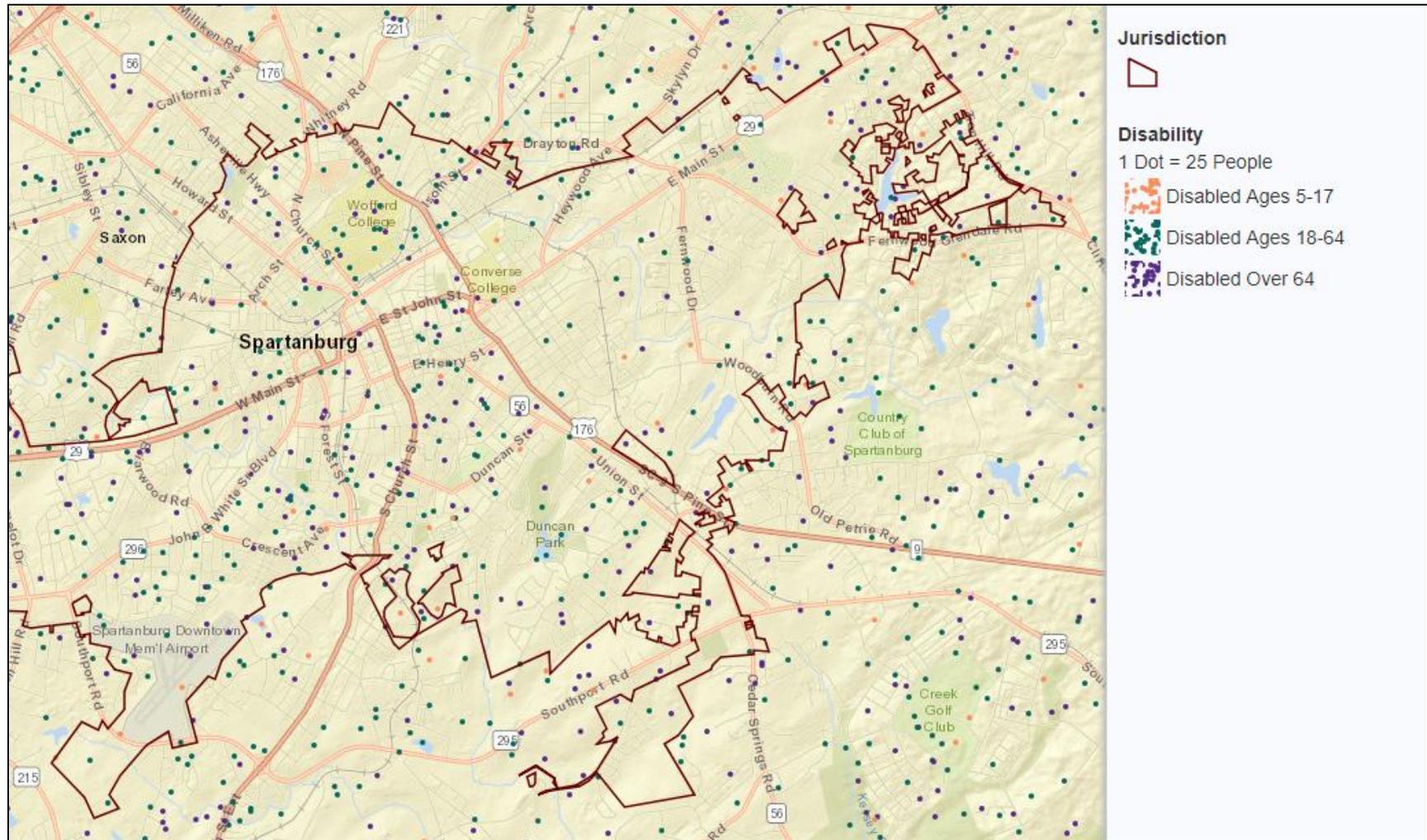
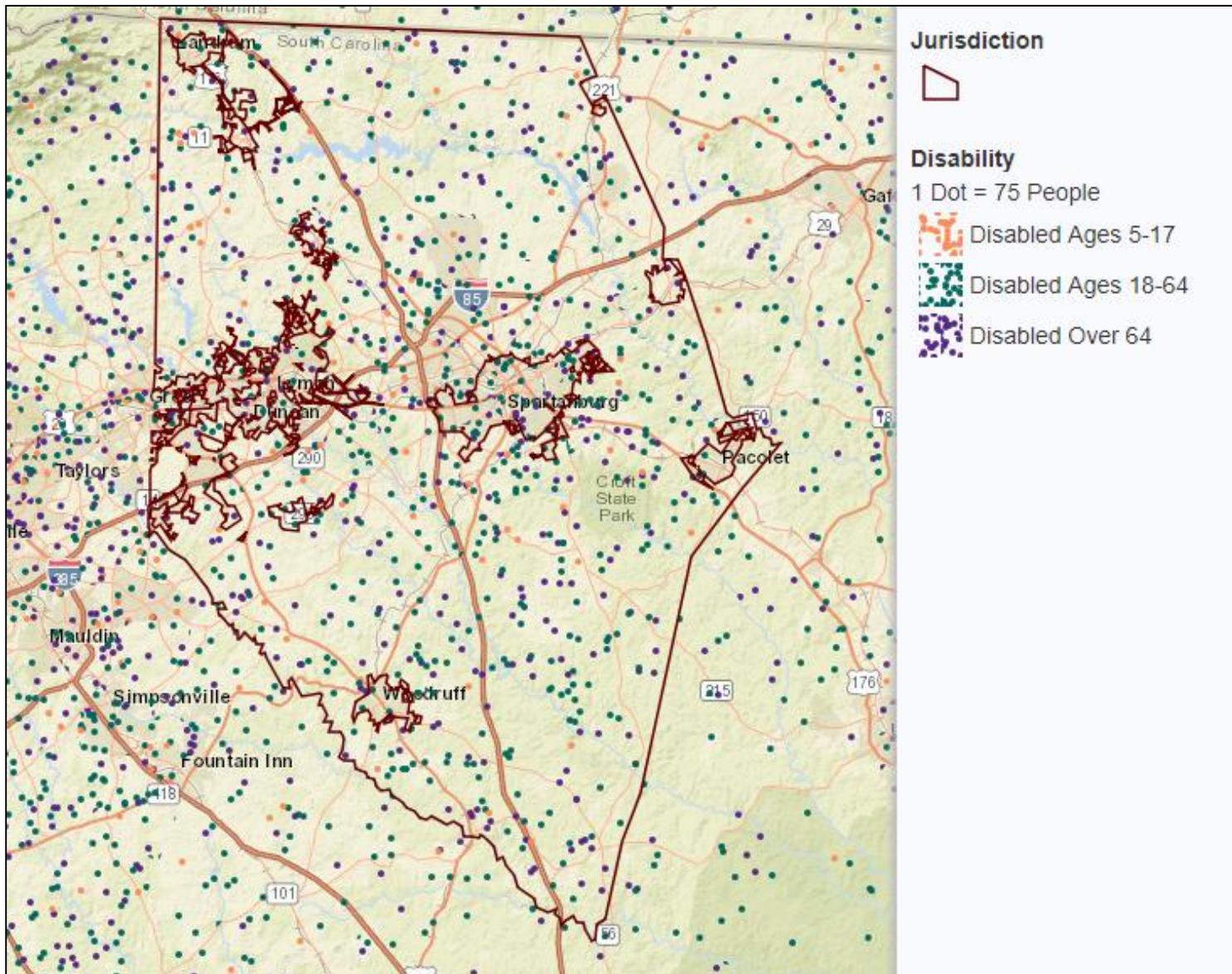


FIGURE 47. PEOPLE WITH A DISABILITY BY AGE IN SPARTANBURG COUNTY



ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

A search using HUD’s Affordable Apartment Search Tool was conducted to identify affordable rental properties in the City of Spartanburg designed to serve people with disabilities. The search returned 17 results; seven properties specifically designated for people with disabilities, four listed as being for elderly households, and four serving family households. A search of Spartanburg County found 27 total results, including the 17 in the City of Spartanburg and 10 additional listings. Among the 10 listings in the county but outside the City of Spartanburg, four were designated for people with disabilities, three listed for elderly households, and two for families.

A similar point-in-time search on socialserve.com for affordable apartments currently for rent in the City of Spartanburg returned 35 results, 25 of which had some accessible features. Of these, only two did not have waiting lists – Heritage Court Apartments and Willow Crossing Townhomes. In Spartanburg County, 47 units with accessible features were found including the 25 in the City of Spartanburg. The 22 outside the city include facilities in multiple facilities in Greer, Inman, Woodruff, Landrum, Wellford, and, Moore, and one each in Boiling Springs and Chesnee.

Based on a standard Supplemental Security Income (SSI) payment of \$750 per month (equating to an affordable rent of \$225 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in the City of Spartanburg and Spartanburg County, these subsidized housing options are about 50% more likely to contain households with at least one member with a disability than the housing stock in general. The table below shows that persons with disabilities are able to access all types of publicly-supported housing, except for project-based Section 8 in Spartanburg County. They make up the largest percentage of the other multifamily category.

TABLE 18. DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	People with a Disability					
	City of Spartanburg		Spartanburg County		Spartanburg Region	
	#	%	#	%	#	%
Public Housing	206	35.7%	3	8.1%	209	34.0%
Project-Based Section 8	109	18.1%	N/A	N/A	109	18.1%
Other Multifamily Housing	24	96.0%	76	43.4%	100	50.0%
HCV Program	146	19.8%	203	18.2%	436	18.8%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may

include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

ACCESS TO OPPORTUNITY

The two areas of the City of Spartanburg where people with disabilities are most clustered are census tracts 20301 and 20400 located around Spartanburg Regional Medical Center and Wofford College. These areas both have high rates of transit usage. This could be because they have higher rates of disability and more residents who depend on the service, but could also make the areas attractive to people with disabilities seeking to live in a community with good public transit access along with access to the medical center. The area also has relatively high poverty rates, so public transportation may be a necessity because of financial considerations. In Spartanburg County, people with disabilities are clustered within the cities and are less likely to live in rural areas. This is intuitive given the location of resources within urban areas, and it also means that access to opportunity for the majority of residents with disabilities, even those in the region, are more closely aligned with opportunity indicators for the city than for the region.

ZONING AND LAND USE REGULATIONS AND ACCESSIBILITY

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local land use authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc. Conditions of the city zoning code and county ULMO affecting accessibility are assessed in the following sections. Several elements of the following analysis refer back to the scored zoning code review presented in Chapter 6.

Definition of "Family" and Group Housing for Persons with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations. The City of Spartanburg defines "family" under its Zoning Code to include one or more persons related by blood, marriage or adoption, and in addition, any domestic servants or gratuitous guests thereof, or a group of not more than five persons who need not be so related, and in addition domestic servants or gratuitous guests thereof, who are living together in a single dwelling unit and maintaining a common household. Although the definition includes adoptive relationships, it does not mention foster care, which is potentially problematic under due process scrutiny.

Spartanburg County defines “family” under its Unified Land Management Ordinance as one or more persons related by blood, marriage, adoption, or guardianship, and not more than five (5) persons not so related, except that mentally and physically handicapped persons for whom care is provided on a 24-hour basis shall be construed to be a family, in accord with the provisions of 6-7-830 of the South Carolina Code of Laws. Although the County includes provisions for guardianship, it also limits to five persons if unrelated by blood.

Limiting single family to no more than 5 unrelated individuals is neither the most permissive nor most restrictive under case precedent, but does fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage, and may violate fair housing, privacy, and due process protections. More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leaves maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government’s right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal Fair Housing Act as it may have a disproportionate impact on people with disabilities, minorities, and families with children. Another option is to amend the ordinance to add an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Additionally, the City’s ordinance should be amended to explicitly include relationships based on foster/legal guardianship. Accordingly, the City of Spartanburg and Spartanburg County received a “2” moderate risk score on Issue 1 of the matrix.

Section 6-29-770 of the state code provides an exception to zoning provisions for a group home serving nine or fewer mentally or physically handicapped persons provided the home provides care on a twenty-four hour basis and is approved or licensed by a state agency or department or under contract with the agency or department for that purpose. A home is construed to be a natural family or such similar term as may be utilized by any county or municipal zoning ordinance to refer to persons related by blood or marriage. The law establishes a process for locating the home with opportunity for input from the governing body. An application for variance or special exception is not required.

The City’s “Family” definition does not distinguish between or treat persons with disabilities differently *because of* their disability. However, the zoning code on its face does not allow for supportive housing services for persons with disabilities in residential districts. Commonly zoning codes will contain provisions for “Residential Care Facilities,” or “Adult Group Homes.” The City of Spartanburg’s code allows “Group Homes” in most commercial and industrial districts. However, the term is not defined, and no other description could be found for Group Homes except for a parking requirement. Furthermore, a “Group Home” is not identified as an allowable use in any of the residential zoning districts, and these districts do not reference state or federal exceptions. In the city’s downtown, a “Home for the Handicapped” is defined as “a home serving nine or fewer mentally or physically handicapped persons, providing care on a 24-hour basis, and approve or licensed by a state agency or department or under contract with the

agency or department for that purpose is exempt from local zoning ordinance requirements. Such a home is construed as a natural family as if related by blood or marriage.” This mirrors the definition in 6-29-770(E), and the definition even references the state code. However, section 3.2.5 of the downtown code provides additional restrictions on new Homes for the Handicapped, including separation requirements from other Homes for the Handicapped and childcare centers. This appears contrary to the state’s exception.

In the County’s ULMO, the definition of “family” includes mentally and physically handicapped persons for whom home care is provided. As in the city, there are no other uses such as “Group Home” expressly allowed in residential areas, but the definition of “Family” provides an allowance for housing for people with disabilities above the maximum occupancy, and presumably it would be allowed in accordance with the process in 6-29-770. The definition references a section of state law that was repealed in 1999 (6-7-830), which should be corrected.

Because of the ambiguity regarding the “Group Home” use, the lack of allowances for other supportive housing in residential zoning districts, and the additional restrictions in the downtown code, the City received a “3” high risk score on Issue #5. Regulations should be amended to make clear that housing for persons with disabilities may be sited as specifically permitted under state law and equally with other single-family housing for unrelated persons. The County received a “1” low risk score on Issue #2, although the reference to 6-7-830 of the state code should be removed, and more proactively defining supportive housing would reinforce that it is permitted.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations’ impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Neither the City of Spartanburg or Spartanburg County have adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, the ULMO, land use, and other regulatory requirements. Rather both jurisdictions appear to rely on the variance process for such matters. In the City of Spartanburg the Board of Zoning Appeals holds power to hear and decide applications for variances following the public notice and hearing process. The County Board of Appeals has authority to decide variance requests within unincorporated Spartanburg County. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard

based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents. The variance process in the zoning code and ULMO has been identified as an impediment to persons with disabilities seeking a uniform process for requesting a reasonable accommodation, and accordingly both jurisdictions received a “2” on Issue #3.

Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized administrative process.

Supportive Housing for Persons Recovering from Alcohol or Substance Addiction

Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities.

In the City of Spartanburg a “Drug and Alcohol Treatment Center” is listed as an allowable use in several commercial and industrial zoning districts. However, the term is not listed in the definitions, and it is not listed as an allowable use in any residential zoning district. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities. Accordingly, for treatment facilities which house five or fewer unrelated persons recovering from drug or alcohol addiction, this disparate treatment may violate the FHA, and the City received a “3” high risk score on Issue #5.

The County’s ULMO does not address the location or siting of residential substance abuse treatment facilities. Therefore, presumably as long as the facility otherwise met the definition of single-family dwelling, such housing should be permitted equally with single-family dwellings. But because the code is not clear on this issue there is potential for ambiguity and unequal treatment, and the County received a “2” medium risk score on this issue.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING RESOURCES

South Carolina passed a comprehensive state fair housing law in 1989, the South Carolina Fair Housing Law (“S.C. Fair Housing Law”) (S.C. CODE ANN. § 31-21-10 through § 31-21-150), which closely parallels Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the “FHAA”). Both prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions based on sex, race, color, disability, religion, national origin, or familial status. The S.C. Fair Housing Law gives the South Carolina Human Affairs Commission (SCHAC) jurisdiction to enforce the S.C. Fair Housing Law and investigate all fair housing complaints in the state. The SCHAC has promulgated regulations regarding the S.C. Fair Housing Law, found at S.C. CODE ANN. REGS. 65-210 through 65-246.

HUD has certified the S.C. Fair Housing Law as “substantially equivalent” to the FHAA, the state fair housing law must provide at a minimum similar “rights, procedures, remedies, and the availability of judicial review that are substantially equivalent to those provided in the federal Fair Housing Act.” (24 C.F.R. § 115.201 et seq.). Although a substantially equivalent state’s law may include additional protected classes, South Carolina has not extended protections to any other class of persons outside of those seven protected by the federal FHAA. Substantial equivalence certification, which is renewed approximately every 5 years, allows the SCHAC to apply annually for federal funding under HUD’s Fair Housing Assistance Program (FHAP) to receive, investigate, and enforce charges of housing discrimination.

FAIR HOUSING LAWSUITS AND COMPLAINTS

An individual in the City of Spartanburg or Spartanburg County who believes he or she has been the victim of an illegal housing practice under the FHAA or S.C. Fair Housing Law may seek assistance from the SCHAC within 180 days of the alleged discriminatory act or file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, once certified, HUD will refer complaints of housing discrimination that it receives back to the state or local FHAP agency for investigation, conciliation, and enforcement activities. HUD policy favors having fair housing professionals based locally where the alleged discrimination occurred because it has found that a state or local agency’s closer proximity to the site of the alleged discrimination provides greater familiarity with local housing stock and trends and may lead to greater efficiency in case processing. Because the SCHAC is a certified FHAP agency, most complaints filed with the HUD FHEO office will be referred back to the SCHAC for investigation and enforcement.

The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident).

Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After the SCHAC or FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the SCHAC/FHEO must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the investigator determines that there is no "reasonable cause," the case is dismissed. The advantages of seeking redress through the administrative complaint process are that the SCHAC/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. The SCHAC reports that the average case processing time is 100 days. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints Filed with HUD

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout South Carolina (as well as Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, Tennessee, Puerto Rico, and U.S. Virgin Islands). To achieve its mission of protecting individuals from discrimination, promoting economic opportunity, and achieving diverse, inclusive communities, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

A request was made to the HUD regional office for complaints received regarding housing units in the City of Spartanburg and Spartanburg County for the previous five-year period. The Atlanta Regional Office of FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints.

From January 1, 2013 through July 2, 2018, HUD processed 3 formal complaints of housing discrimination occurring within the jurisdictions of the City of Spartanburg, the City of Woodruff, and in the Boiling Springs area in unincorporated Spartanburg County. At the time of response, two of those cases were still open. The closed case was due to a no cause determination following investigation.

TABLE 19. HOUSING DISCRIMINATION COMPLAINTS FILED WITH HUD FROM JANUARY 2013 TO JULY 2018

Case No.	Violation Location	Filing / Closing Date	Basis	Issue	Closure Reason	Settlement Amount
04-13-0427-8	Boiling Springs	2/19/13 - 5/29/13	National Origin, Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	\$0
04-13-0551-8	Spartanburg	3/22/13	Race, Retaliation	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.); Discriminatory acts under Section 901 (criminal)	Still open	
04-18-2748-8	Woodruff	6/1/18	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Still open	

Source: FOIA Request to HUD Region VI Office of Fair Housing and Equal Opportunity

More than one basis of discrimination may be cited in a single complaint. For the survey period, retaliation was cited in 2 complaints as the basis of discrimination, followed by national origin, disability, race, and sex each being cited once. Also, more than one discriminatory act or practice, recorded as the discriminatory *issue*, may be cited in a single complaint. For the reported cases, the following issues were reported: discriminatory refusal to rent; discriminatory advertising, statements and notices (2); discrimination in terms/conditions/privileges relating to rental; discriminatory acts under Section 818 (coercion, Etc.); failure to make reasonable accommodation; discriminatory acts under Section 818 (coercion, Etc.); discriminatory acts under Section 901 (criminal); discriminatory terms, conditions, privileges, or services and facilities; otherwise deny or make housing unavailable; discriminatory acts under Section 818 (coercion, etc.).

Complaints filed with the South Carolina Human Affairs Commission

A request also was made to the SCHAC for data reflecting the number of housing discrimination related complaints received by the Commission regarding housing units in the City of Spartanburg and Spartanburg County. Between January 1, 2013 and July 3, 2018, the Commission processed 15 fair housing complaints related to properties in the subject jurisdictions and provided the data on the following pages regarding the basis of complaint and case status.

From January 1, 2013 through July 2, 2018, the SCHAC processed 15 formal complaints of housing discrimination occurring within the City of Spartanburg (11), the Boiling Springs area (2), Greer (1), and Lyman (1). At the time of response, four of those cases were still open. The disposition of the closed cases included one case that closed due to failure of the complainant to cooperate in the investigation, 5 cases that were closed due to successful conciliation / settlement, and 5 cases that were closed following a no cause determination. Two of the settled cases included a compensatory award of \$750 and \$1,400, respectively.

More than one basis of discrimination may be cited in a single complaint. For the survey period, disability was cited in 11 complaints as the basis of discrimination, followed by race in 4 cases, national origin in 2 cases, retaliation in 2 cases, familial status in 1 case, and religion in 1 case.

TABLE 20. COMPLAINTS RECEIVED BY SCHAC BY BASIS, JANUARY 2013 TO JULY 2018

Basis	# of Complaints
Disability	11
Race	4
National Origin	2
Retaliation	2
Familial Status	1
Religion	1

Source: South Carolina Human Affairs Commission

TABLE 21. COMPLAINTS RECEIVED BY SCHAC, JANUARY 2013 TO JULY 2018

Case No.	Violation City	Filing / Closing Date	Basis	Issue	Closure Reason	Settlement Amount
04-18-1849-8	Boiling Springs	3/22/18-	Race, Retaliation	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.)	Still open	
04-18-1866-8	Boiling Springs	3/22/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Still open	
04-17-6614-8	Greer	1/4/17-5/16/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation	No cause determination	
04-16-5482-8	Lyman	9/18/16-1/24/17	Familial status	Discriminatory refusal to rent	Complainant failed to cooperate	
04-13-0296-8	Spartanburg	1/22/13-6/28/13	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation / settlement	
04-13-0398-8	Spartanburg	2/11/13-3/27/13	Disability	False denial or representation of availability; Failure to make reasonable accommodation	Conciliation / settlement	\$750
04-13-0982-8	Spartanburg	8/8/13-10/25/13	Disability	Failure to make reasonable accommodation	Conciliation / settlement	
04-15-1007-8	Spartanburg	8/27/15-11/19/15	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation / settlement	\$1,400
04-16-4277-8	Spartanburg	2/5/16-3/18/16	Race, Disability	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	

Case No.	Violation City	Filing / Closing Date	Basis	Issue	Closure Reason	Settlement Amount
04-17-5817-8	Spartanburg	10/31/16-2/24/17	Disability	Failure to make reasonable accommodation	Conciliation / settlement	
04-17-8376-8	Spartanburg	6/1/17-6/30/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Other non-compliance with design and construction requirements; Failure to make reasonable accommodation	No cause determination	
04-17-8377-8	Spartanburg	6/1/17-3/29/18	Race, National Origin, Retaliation	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
04-18-1507-8	Spartanburg	2/22/18-	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Still open	
04-18-1851-8	Spartanburg	3/22/18-6/13/18	National Origin, Religion	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.)	No cause determination	
04-18-1949-8	Spartanburg	3/29/18-	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Still open	

Source: South Carolina Human Affairs Commission

Also, more than one discriminatory act or practice, recorded as the discriminatory *issue*, may be cited in a single complaint. For the reported cases, the following issues were reported: failure to make reasonable accommodation (8 times); discriminatory terms, conditions, privileges, or services and facilities (6 times); discriminatory acts under Section 818 (coercion, Etc.) (5 times); discrimination in terms/conditions/privileges relating to rental (5 times); discriminatory refusal to negotiate for rental (5 times); otherwise deny or make housing unavailable (4 times); discriminatory refusal to rent (3 times); other non-compliance with design and construction requirements (1 time); and false denial or representation of availability (1 time).

Fair Housing Lawsuits and Litigation

For the recent five-year period—January 1, 2013 through August 2018—no significant cases or precedential decisions were found regarding allegations of unlawful housing discrimination occurring in the City of Spartanburg or Spartanburg County that resulted in federal litigation or a HUD ALJ decision/settlement.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

The City of Spartanburg and Spartanburg County partner together to pursue a joint program of fair housing activities. Typically, the City and County work together to plan and implement activities and split the expenses in order to deliver more coordinated program offerings, reaching more people, and having a greater impact on the community. Other partners that the City and County work with in these efforts include the Spartanburg Housing Authority, Greenville Human Relations Commission South Carolina Human Affairs Commission, Spartanburg Association of REALTORS, Regenesis CDC, churches, banks, senior advocacy groups, local homeless shelters, apartment complexes, housing providers, housing developers, real estate agencies and groups, insurance providers, and others.

Recent activities to provide fair housing education and promote fair housing services have included the following:

- The City of Spartanburg and Spartanburg County have a variety of promotional items that are used for information/awareness at City and County events, neighborhood association meetings, and in other settings. Woven tote bags stating “Spartanburg Welcomes Everyone Home” and listing the Fair Housing hotline, and a variety of other items, including house shaped magnets with the hotline number, pens, notepads, and chip clips were given out. Fair Housing rack cards (in English and Spanish) on housing discrimination and the Fair Housing Hotline were distributed at several events.
- Local Newspapers: A full page color ad for the First Time Homebuyers Seminar was published in the Spartanburg Herald Journal, as well as a digital banner on their website to promote the event.
- Fairway Outdoors: Billboards in English and Spanish continued to be displayed across the county to provide signage awareness for Fair Housing and the hotline number to call. For the 50th anniversary of the Fair Housing Act, 6 billboards were developed and displayed throughout the months of April and May.
- JAMZ 107.3, a minority radio station, aired commercials during May promoting the First Time Homebuyers Seminar.

- **Hispanic Marketing:** In order to ensure that the Hispanic community had an opportunity to be aware of their rights, 13 advertisements were published in La Nacion Hispana (July-June), the leading Hispanic newspaper, outlining Fair Housing laws and practices. A full page color ad promoting Fair Housing awareness was continued with Guia Hispana (Hispanic Pages) for 2016-2017. Spanish language Flyers for the First Time Homebuyers Seminar were also distributed, and an ad was published in several editions of La Nacion.
- **Fair Housing Web site:** The Spartanburg County website has information and relevant links. Basic information, the local hotline, and links to related local, state and federal sources of information are included. The City of Spartanburg website also has a fair housing component with links to information as well as fair housing laws.
- **Fair Housing Hotline:** Community residents can call the Referral line that is available throughout the year to report violations pertaining to Fair Housing and/or discrimination; in conjunction with this, we maintain an ongoing partnership with the South Carolina Human Affairs Commission. A partnership with the Greenville Human Relations Commission also allows all incoming calls seeking a Spanish speaker to be referred to their hotline. Referrals to other agencies were made as appropriate.
- Fair Housing information was displayed in SPARTA bus shelters in conjunction with both the City of Spartanburg and the South Carolina Human Affairs Commission.
- The City and County co-sponsored a Real Estate Summit in 2017 hosted by the United Way of the Piedmont and also sponsored by the South Carolina Community Loan Fund, Spartanburg Association of Realtors, and Habitat for Humanity of Spartanburg. Over 150 people attended representing nonprofits, housing agencies, civic leaders and community members. The featured keynote speaker was Shirley Franklin, former Mayor of Atlanta, Georgia. Information on housing affordability and its impact on life in Spartanburg was presented by USC Upstate, the Institute for Child Success, the Spartanburg Area Chamber of Commerce, the Urban League of the Upstate, the S C Community Loan Fund, the United Way and various other community organizations. Other topics included homelessness in Spartanburg, housing choice vouchers, gaps in housing services, and what other municipalities are doing. The Community Development Department took part in a breakout session on Affordable Housing Strategies in the City & County of Spartanburg.
- An Heirs' Property Preservation Seminar was presented by the County and the City with approximately 20 people attending from the County, City of Spartanburg, Spartanburg Housing Authority, City of Greenville, and various nonprofit service providers.
- **First Time Homebuyers Seminar at C.C. Woodson Community Center.** Presentations and information were given by Realtors on Down Payment Assistance Program, Mortgage qualifications and Credit scores, Home Warranties, Inspections and Insurance, Closing Attorneys and Fair Housing. Legal Aid also had a table with fair housing information. The City and County had a joint table with information on local programs and fair housing. Information on fair housing and promotional items with the fair housing hotline number were given out. Approximately 130 people attended. Needs Assessment/Fair Housing surveys were distributed and 41 responses received. Flyers were distributed in both English and Spanish. In addition, Spanish Translators were on hand for the event if anyone needed that service.
- Spartanburg County set up an information table at Mount Moriah Baptist Church's annual Community Health Awareness Day. The table focused on fair housing and county housing programs, including the Homeownership program and housing rehabilitation. Spartanburg

County also helped recruit several relevant vendors, including Legal Aid. Participants received Fair Housing information and promotional materials with the fair housing hotline number. Legal information, credit counseling and related state and local services. Several participants filled out surveys collecting demographic information, housing discrimination experience, and access to basic services.

- 4th Annual Neighborhood Conference: In April 2018 at Spartanburg Community College's Downtown Campus, the City partnered with Spartanburg County on a day-long event with 6 breakout sessions, three of which dealt with fair housing issues: Fair Housing and the Law – Facilitated by Mr. Don Frierson, Investigator with the SC Human Affairs Commission; Housing Choices – Facilitated by the SHA; Code Enforcement and Landlords – Facilitated by City and County Code Enforcement Officers.
- In partnership with the Spartanburg Association of Realtors, a proclamation was signed by City of Spartanburg Mayor Junie White, proclaiming April Fair Housing Month. This was also promoted in the Spartanburg Herald Journal.

DRAFT

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with a table listing their associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 22, along with goals, timelines, and responsible parties.

Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices

Affordable housing options in the Spartanburg region tend to be clustered in a few neighborhoods on the south and northwest sides of the City of Spartanburg. The vast majority of public housing units are located here as well as the majority of Project Based Voucher-supported housing. Housing Choice Voucher use, while focused in somewhat different areas, also tends to be centered in and around the City of Spartanburg. Low Income Housing Tax Credit units are among the most widely-distributed type of publicly supported housing, with locations in the City of Spartanburg, its suburbs, and at least nine other small towns and cities throughout the county. Areas where publicly supported housing is located tend to have relatively low shares of white residents. Because of the lack of geographic diversity in the locations of affordable housing throughout the region, the opportunity features available to affordable housing residents tend to also lack variety. Many of them have relatively good access to employment opportunities and public transportation, but are often isolated from the areas with the best schools and environmental quality. For residents who particularly value these opportunity features, their access is limited by the location of affordable housing in these areas.

Impediment #2: Neighborhoods Need Place-Based Community Investments

Focusing investment in areas that are most affected by poverty is needed in order to enhance the physical environment, increase the opportunities available to the community's residents, and build the human capital of people residing there. The demographic analysis in this report shows the presence of several racially and ethnically concentrated areas of poverty on the western side of the City of Spartanburg, where the poverty rate is over 40% and more than half of residents are people of color, primarily African Americans. Opportunity data also shows that there are gaps in access to schools, jobs, labor market engagement, and low poverty neighborhoods between white and Black residents and, to a lesser degree, between white and Latino residents. White households are also more likely to own their homes, and stakeholders indicated difficulty in developing new homes in some lower income areas due low appraisals and related inabilities to obtain loans. While encouraging affordable housing in high opportunity areas, as described in Impediment #1, is an important fair housing goal, addressing resource gaps and fostering opportunities-in-place is also crucial.

Impediment #3: Need for Continued and Expanded Fair Housing Activities

Working together, Spartanburg County and the City of Spartanburg have made strong efforts to promote fair housing education and resources, including outreach to and coordination with local agencies, a dedicated hotline for discrimination complaints, advertisement on billboards and bus shelters, targeted outreach to the Spanish-speaking community, and events dedicated to expanding access to housing (e.g., the 2017 Real Estate Summit). Overall, most stakeholders who participated in interviews were aware of at least some of the City and County's efforts, and many named the Fair Housing Hotline as a resource for reporting a housing discrimination complaint. Community survey results show that about 84% of participants report understanding or somewhat understanding their fair housing rights, and 52% report knowing where to file a discrimination complaint. These results indicate that education efforts have reached many residents in the city and county, although there is still need for continued outreach to the public and other community organizations. Further, as part of their fair housing efforts, the City and County should consider ways that they can facilitate conversations between diverse groups of residents, as well as expand awareness about housing opportunities in different areas of the city and county. Several meeting participants and stakeholders noted that in many ways housing opportunities in Spartanburg are hindered by historic patterns and conceptions about where different racial groups should live in, which in turn perpetuate segregated housing patterns.

Impediment #4: Affordable Housing Planning Lacks Equity Focus

Planning for affordable housing, whether the production of new units or the administration of affordable housing programs, can greatly benefit from an equity lens applied in decision making processes to ensure fairer, more equitable outcomes. Understandably, affordable housing decisions can be complex, with many worthy but competing alternatives under consideration, often resulting in a compromise solution. By adding an equity consideration to the process, development goals and policy outcomes can be steered toward actions that work toward greater fairness. For example, in neighborhood revitalization projects, decisionmakers must straddle a line between making focused investments in a single community for greater impact and the possibility that needs in other communities may go unfunded as a result. An intentional focus on equitable outcomes may require reconsideration of certain policies and processes.

Impediment #5: Limited Housing Options for People with Disabilities

Several elements within the City's zoning code and County's ULMO could be amended or clarified to increase housing options for people with disabilities. Neither code currently contains a reasonable accommodation process whereby a person who is disabled may seek an administrative approval of a home modification rather than submit it through the more cumbersome variance process. Not only does an administrative process save time and cost, it also does not subject the applicant to a public hearing, which can unnecessarily lead to opposition from neighbors. The City's zoning code applies a form of a "related by blood or marriage" standard to determining whether a household may be considered a family. The definition could be rewritten to relax this standard, which could potentially make it easier for live-in aids and caregivers to support residents with disabilities. In some cases, both the City and County codes could resolve ambiguous definitions group homes and where they are permitted. Finally, the most frequent basis of filed housing discrimination complaints is disability status and a number of stakeholders and public participants in the AI development believed the need for more accessible rental housing was

among the most important local housing issues. Education and regulatory protections for the housing needs of this vulnerable population should be addressed.

Impediment #6: Weak Job-Transit Connections

Throughout the community engagement process, one area that was consistently discussed as impacting housing choice and access to resources was transportation. More specifically, participants noted that several major employers such as BMW, Michelin, and others are not accessible via public transit, essentially barring someone without personal transportation from obtaining a job there. Quantitative data used to assess access to jobs echoed this sentiment. HUD's job proximity index shows relatively low index values in much of the City of Spartanburg's south and west sides, areas that coincide with where many of the city's African American residents live. In terms of proximity to jobs, index scores for white residents in the City of Spartanburg are 17 points higher than those for Black residents. While funding limitations and relatively low-density development patterns may inhibit regular, fixed-route bus service from the City of Spartanburg's south and west neighborhoods to suburban job centers, the City of Spartanburg should consider other avenues for providing a transit connection between the two, such as more actively pursuing the possibility of partnership with employers for dedicated vanpools.

TABLE 22. FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #1: Lack of Geographic Diversity in Affordable Housing Choices		
<p>Affordable housing is limited, particularly in desirable suburban and urban areas where communities offer enhanced access to some types of opportunity</p>	<ul style="list-style-type: none"> • A regular, ongoing campaign to reach and recruit new landlords into the HCV program should be designed by SHA and implemented with partnership from the City and County. • The City and County should be supportive and accommodating of proposed LIHTC developments within their jurisdictions, providing letters of support or gap financing where possible and appropriate. • New affordable housing development, whether by the SHA in its RAD conversions or the City and County with CDBG or HOME funds, should be given priority consideration when it will be located in an area that increases access to new types of opportunity. 	<p>City of Spartanburg Spartanburg County Spartanburg Housing Authority</p>
Impediment #2: Neighborhoods Need Place-Based Community Investments		
<p>Significant gaps in labor market engagement, including employment and educational attainment, exist between residents by race and ethnicity</p>	<ul style="list-style-type: none"> • In partnership with local workforce development agencies, offer employment readiness and job search assistance to low and moderate income residents who are unemployed or underemployed • Explore opportunities for strengthening transportation options to employment centers (see Impediment #6) 	<p>City of Spartanburg, Spartanburg County, Spartanburg Housing Authority</p>
<p>Reduced access to homeownership for African American and Latino households</p>	<ul style="list-style-type: none"> • Fund agencies that provide homeownership preparation and financial counseling for first time homebuyers. Work with local organizations to market these services to communities of color. • Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers. • Meet with lenders and/or appraisers to inform them of goals for furthering fair housing and discuss lending barriers related to homeownership and community reinvestment in low-income neighborhoods. 	<p>City of Spartanburg Spartanburg County</p>

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #3: Need for Continued and Expanded Fair Housing Activities		
Local residents lack information about fair housing rights and resources	<ul style="list-style-type: none"> • Continue fair housing education activities, with a focus on expanding the pool of organizations the City and County work with (ex: churches, schools, LEP communities/ organizations) • Translate fair housing education materials to the variety of languages represented in the City of Spartanburg and Spartanburg County; Develop an approach for handling hotline calls or other complaints from people who speak languages other than English and Spanish 	City of Spartanburg Spartanburg County Spartanburg Housing Authority
Historic segregation patterns influence housing options and social structure	<ul style="list-style-type: none"> • Explore options for a communitywide event or events that encourage interaction among diverse participants in neighborhoods throughout the city and county 	City of Spartanburg Spartanburg County
Impediment #4: Affordable Housing Planning Lacks Equity Focus		
Equity issues are not routinely and consistently considered on a regional basis in planning and policymaking for affordable housing	<ul style="list-style-type: none"> • The City, County, and SHA should jointly explore the creation of an evaluation tool that could be used to review development and policy decisions to maximize equitable outcomes (e.g. the King County Housing Development Consortium’s Racial Equity Impact Tool). • The City and County should annually review and provide comment on the SHA’s annual PHA Plan to ensure it is furthering affordable housing opportunities in high-opportunity areas; SHA should do likewise with the City and County Annual Action Plans. • New affordable housing development, whether by the SHA in its RAD conversions or the City and County with CDBG or HOME funds, should be given priority consideration when it will be located in an area that increases access to new types of opportunity. • As the City and County comprehensive plans are routinely updated, the community development/ neighborhood services staff at the City and County and the SHA should review the proposed housing element updates and comment to planning staff on any concerns related to equity of planning policies or development plans. 	City of Spartanburg Spartanburg County Spartanburg Housing Authority
Impediment #5: Limited Housing Options for People with Disabilities		
The City and County do not have a clear and objective process by which persons with disabilities may request a reasonable accommodation	<ul style="list-style-type: none"> • Consider, draft, and adopt local code amendments that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. 	City of Spartanburg Spartanburg County

Contributing Factors	Recommended Activities	Responsible Parties and Partners
Impediment #5: Limited Housing Options for People with Disabilities (continued)		
<p>Ambiguous or inconsistent zoning/land use code provisions raise questions about allowable siting and occupancy for housing for people with disabilities</p>	<ul style="list-style-type: none"> • Family definitions should be reviewed to consider the elimination of relationship by “blood or marriage” as a basis determining whether a household qualifies as a family and/or whether caps on the number of unrelated individuals who may live together are warranted at all. • Regulations relating to the siting of group homes should be clarified, with clear siting options available in residential districts and the group home definitions aligned with the codes’ respective family definitions to ensure that the treatment of people living in group homes is consistent with that of the non-disabled population. • Review and clarify the permitted locations of housing serving people recovering from alcohol or substance abuse addition to include residential districts. 	<p>City of Spartanburg Spartanburg County</p>
<p>Housing discrimination complaint filings suggest housing providers need greater education and accountability</p>	<ul style="list-style-type: none"> • Monitor and provide financial support for the efforts of existing community-based organizations in offering fair housing enforcement and education related to the rights of people with disabilities. 	<p>City of Spartanburg Spartanburg County Spartanburg Housing Authority</p>
Impediment #6: Weak Job-Transit Connections		
<p>Transit is not available between City of Spartanburg neighborhoods and major employers in the county</p>	<ul style="list-style-type: none"> • Research alternate programs that may provide direct transportation linkages between housing and employment centers (ex: vanpools, expansion of SPARTA or existing dial-a-ride vehicles) and potential funding sources • Approach key employers for discussion around transit options and potential roles they could play (ex: sponsorship of vanpools, adjusted work hours, etc.) 	<p>City of Spartanburg Spartanburg County</p>