



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
Region VII  
OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY  
Gateway Tower II, 4<sup>th</sup> Floor  
400 State Avenue  
Kansas City, KS 66101-2406

December 11, 2017

The Honorable Leslie Soden  
Mayor of Lawrence, Kansas  
City Hall  
PO Box 708  
Lawrence, KS 66044

Ms. Shannon Oury  
Executive Director Lawrence-Douglas County Housing Authority  
1600 Haskell Avenue  
Lawrence, KS 66044

Dear Mayor Soden and Ms. Oury:

Thank you for Lawrence's support as HUD implements its Affirmatively Furthering Fair Housing (AFFH) rule and Lawrence's efforts in completing an Assessment of Fair Housing (AFH). As you know, the AFH assists communities in identifying fair housing issues and opportunities and will help your jurisdiction make more informed community planning decisions with the results.

We are pleased to inform you that the U.S. Department of Housing and Urban Development (HUD) has accepted the Lawrence-Douglas County Housing Authority's AFH (see 24 C.F.R. § 5.162(a)(2)).

Now that HUD has accepted the Joint AFH that covers Lawrence and the jurisdiction of the Douglas County Housing Authority, please be aware that the AFFH Final Rule provides that:

1. The City's consolidated plans and annual action plans, and PHA's Plans (including any plans incorporated therein), must include strategies and actions that implement the priorities and goals from the AFH that are intended to affirmatively further fair housing. Strategies and actions must affirmatively further fair housing and may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, including HUD-assisted housing (see § 5.154(d)(5)).
2. In addition, the AFH process is intended to inform other community plans including, but not limited to: education, transportation, or environmental related plans. For options and recommendations on how this may be accomplished, please see the AFFH Rule Guidebook.

Please note that HUD expects the City of Lawrence and Lawrence-Douglas Housing

Authority to add more specificity on goal implementation (specifically metrics, milestones, and timeframes for achievement) in its consolidated plan, annual action plans, and PHA plans than was provided in the final AFH submission. Additional technical assistance on goals can be found in the attached memo.

HUD has many resources designed to support Lawrence's AFFH efforts. You will find a portal for requesting AFFH technical assistance, fact sheets, and other useful AFFH resources at [HUDEXchange.info](http://HUDEXchange.info). Please see the enclosed technical assistance provided as a courtesy, and reach out to your local HUD field office with any questions or to obtain additional technical assistance.

We look forward to working collaboratively with you during your 3- to 5-year planning cycle and appreciate your efforts to affirmatively furthering fair housing.

If you have questions about this letter, please contact me at 913-551-6857.

Sincerely,



Betty J. Bottiger  
Regional Director, Region VII  
Office of Fair Housing and Equal Opportunity

Enclosure:

Technical Assistance Regarding Joint Assessment of Fair Housing

Cc:

Danelle Dresslar, City of Lawrence, Community Development Division

## **HUD-provided Technical Assistance regarding the Joint Assessment of Fair Housing**

Overall, HUD commends Lawrence, Kansas and the Lawrence Douglas County Housing Authority on their Joint AFH. The program participants made a thoughtful and serious study of the issues/prompts in the Assessment Tool and the HUD-provided data and set fair housing goals that are achievable and could lead to meaningful actions to affirmatively further fair housing. HUD is providing the following technical assistance as a courtesy to the collaborating program participants, identifying sections of the Joint AFH where the discussion of the data could improve and suggestions for future submissions.

### Fair Housing Issues related to Transportation

The Joint AFH identified the “availability, type, frequency, and reliability of public transportation” as a contributing factor to disparities in access to opportunity. The Joint AFH discussed the limitations of the on-demand ride service, Night Line, and the bus system stating, “It does not operate, however, on Saturday night or Sunday. The bus itself does not run routes on Sunday either. With no service available on Sundays, it is difficult for those with employment that runs outside of traditional work hours to have access to get to their jobs. A worker who has a Sunday shift must find alternate transportation if they do not have their own means of travel.” While the AFH contained a thoughtful analysis of transportation-related fair housing issues, the AFH did not contain any goals related to transportation. Collaborating with the Lawrence Transit System or local universities might yield low cost options to improve access to public transportation and connect protected-class groups to areas of opportunity. Such options could be considered in future AFHs or other planning efforts.

### Fair Housing Issues related to Source of Income Discrimination

The Joint AFH noted, “Source of Income discrimination” as contributing to the fair housing issues of segregation/integration, disparities in access to opportunity, and disability and access. The Joint AFH set a goal related to Source of Income discrimination: Goal 4: Improve public perception of affordable housing, primarily through education and outreach. Program participants might also consider national best practices such as adding Source of Income protections to the local fair housing ordinance.

### Fair Housing Goals

Some fair housing goals identified in the Joint AFH could have identified clearer “metrics and milestones for determining what fair housing results will be achieved, and indicated the timeframe for achievement.” Metrics and milestones in goals established in the Joint AFH should be as specific as possible, as specified in the AFFH Guidebook on pages 114-115, recognizing that decisions on funding allocations, as well as strategies and actions, will be made in later planning documents including the Consolidated Plan and 5-Year PHA Plan. Assessment Tool instructions to this prompt state in the “Discussion” row, program participants should provide an explanation of how the goal being set is going to address the contributing factors and related fair housing issues. As noted in the acceptance letter, HUD expects the participants to include this additional specificity in the Consolidated Plan, Annual Action Plan, and PHA Plan.

*Goal 1: Increase Affordable Housing.*

The Joint AFH identified location and type of affordable housing as a contributing factor for segregation/integration and disparities in access to opportunity. For example, the Joint AFH mentions these geographic areas: affordable housing stock concentrated in the East and North; Access to Opportunity in the Central, West, and Northeast; high performing schools in the west and northeast; job proximity in Central (North Central and South Central), and East; lower poverty in the Central area; lack of affordable transportation in Northeast (an area of opportunity.) However, the Joint AFH goal to "increase dispersal of affordable housing throughout the community" does not identify how geographical siting could mitigate fair housing issues. Addressing the location of affordable housing might mean considering siting new affordable housing in areas with access to opportunity or working to improve access to opportunity in areas with existing affordable housing stock. In the future, subsequent planning documents and future AFHs should more specifically connect how the goal relates to overcoming the contributing factor(s) and related fair housing issues.

*Goal 2: Explore additional revenue streams for funding the Affordable Housing Trust fund.*

*Goal 4: Improving public perception of affordable housing.*

*Goal 6: Expanding housing choice and access to opportunity.*

*Goal 7: Increase homeownership among low income households and members of the protected classes*

*Goal 8: Increase recruitment and outreach to private landlords.*

These goals need additional information related to metrics, milestones, and timeframe for achievement. For example, goal 2 states, "the Affordable Housing Advisory Board will recommend at least one new revenue stream," but does not state the timeframe for achievement. Goal 4's metrics and milestones could be further refined by identifying numbers of landlords trying to reach and/or identifying landlords operating housing in areas outside of the primary rental areas or in area with access to opportunity. Goal 6 is to "institute an evaluation of the impact on fair housing choice to every residential development proposal," but does not state the timeframe for achievement. Goal 7 states the program participants will "have the resident services office hold homebuyer education and financial literacy workshops once a month," but does not include other metrics, milestones, and timeframes for achievement. For example, types of outreach targeted toward protected class groups. Goal 8 is to, "continue to reach out to private landlords, particularly those in higher opportunity neighborhoods," but does not state the metrics, milestones, or timeframe for achievement. In future Consolidated Plans and PHA Plans, the program participants should refine their fair housing goals with adequate metrics, milestones, and timeframes for achievement.