Omaha-Council Bluffs
Regional Assessment of Fair Housing

City of Omaha and Participating Partners

Draft for Public Comment

Table of Contents

I. Instructions for Public Comment
II. Executive Summary
   Part I Purpose of the Assessment of Fair Housing
SECTION I.

Instructions for Public Comment

This draft of the Regional Fair Housing Assessment will be open for public comment from May 14, 2018 to June 29, 2018. All public comments can be emailed to
fairhousing2018@gmail.com or mailed to City of Omaha Planning Department, 1819 Farnam St. Suite 1111, Omaha, NE 68183.

Program partners will review all comments submitted. A response will be provided in a timely manner in the same format the comments are received. Comments sent by mail should include a return address. In order to ensure that comments are addressed quickly and most effectively incorporated into the final draft of the document, please consider the following:

- Organize comments by headings or sections
- Reference exact locations for corresponding comments
- Be specific when explaining a viewpoint
- Include details for alternative suggestions
- Provide supporting evidence or data

SECTION II.

Executive Summary
SECTION II.
EXECUTIVE SUMMARY

Part I
Purpose of the Assessment of Fair Housing

Part II
Regional Boundaries and Participating Partners

Part III
Summary of Community Engagement

Part IV
Key Findings

Part V
Part I Purpose of the Assessment of Fair Housing

Key Terms:
AFFH: HUD rule requiring grantees to take efforts to affirmatively further fair housing
AFH: The assessment of fair housing required by the AFFH rule to evaluate fair housing
issues and prioritize goals regarding fair housing

The Department of Housing and Urban Development (HUD) published the Rule on Affirmatively Furthering Fair Housing (AFFH) in July of 2015. According to HUD, “affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant’s activities and programs relating to housing and urban development (HUD, 2018).”
The purpose of the rule was to clarify and simplify fair housing requirements for recipients of federal housing dollars. The rule requires these grantees to conduct an Assessment of Fair Housing (AFH) in order to better understand local and regional fair housing issues and to set priorities and goals as based on their analysis (HUD, 2018).

The AFFH rule impacts planning processes and creates increased accountability for fair housing guidelines. “Local governments, Public Housing Authorities, States, and Insular Areas must be involved in fair housing planning to ensure follow through on the obligation to affirmatively further the policies of the Fair Housing Act. These policies include the policy of ensuring that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. They also include the policy of overcoming patterns of segregation and the denial of access to opportunity that are part of this nation’s history (HUD, 2015).”

Part II Regional Boundaries and Participating Partners

The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington, and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances (24 CFR § 92.105).” For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (e.g. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD-provided data, local data, and community input. The jurisdictions also worked
separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing Authorities will also be identified using the acronym associated with the corresponding housing authority.
Omaha Housing Authority - OHA
Douglas County Housing Authority - DCHA
Council Bluffs Municipal Housing Agency - MHA
Bellevue Housing Authority - BHA

Part III Summary of Community Engagement

Purpose and Process

The regional fair housing analysis included a robust community participation process. The engagement process provided opportunities for residents across the region to share knowledge and provide input related to fair housing issues both online and at community events. A wide range of stories, surveys, conversations, and activities pointed to common challenges and priorities in the area. Community input was essential to identifying obstacles to opportunity and access to fair housing in Omaha, Council Bluffs, and Bellevue. These factors were the foundation for regional and jurisdiction goals.

Events and Activities

12 Stakeholder meetings in areas of focus including:
Non-profit and Advocacy Groups
Development Community
Chamber of Commerce
Disability Community
LGBTQ Community
South Omaha/Latinx Meeting
North Omaha Business and Community Leaders
Empowerment Network Event
Realities in Housing Conference (Lenders and Real Estate)
15 Open house meetings;
These meetings were informative and interactive events where attendees could both learn and provide feedback about fair housing and the AFFH process. Meetings were held in Council Bluffs, Bellevue, and several locations in the Omaha area including Northeast and Southeast Omaha, Midtown, Northwest, Southwest, and Elkhorn locations.

Multiple community events and neighborhood meetings including:
Staff members attended festivals, parades, farmer’s markets, conferences, and back-to-school events across the city with a focus on promoting the AFFH website and regional survey. The AFFH team attended all Neighborhood Alliance meetings and provided a presentation at the One Omaha board meeting. An announcement was sent to all neighborhood leaders requesting an opportunity to present information about the AFFH at their association meetings. We sent out a specific request to the 16 neighborhood leaders in the census tracts identified by HUD as R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty). Six of the 16 neighborhoods requested and received a presentation on the fair housing initiative. In addition, two “Realities in Housing” conferences were held focused on promoting the AFFH guidelines to the real estate community, landlords, investors, and lenders in the housing community.

Outreach to the Limited English Proficiency community and refugee community:
The regional housing survey was translated specifically for the refugee community in Omaha. AFFH information was presented to the Refuge Task Force. Both the Human Rights and Relations and Planning staff met with interpreters and refugee families at Lutheran Family Services to ask questions about their housing experiences in Omaha. The team also sent information about the initiative to Omaha Public Schools representatives working with refugee families.

Personal Interviews:
Evaluation of community outreach was an ongoing process throughout the Assessment of Fair Housing. As gaps in engagement were identified, attempts were made to reach out to community members and experts to provide more information about specific groups or topics.

Surveys:
- Regional Fair Housing Survey: Covered a range of issues related to fair housing, access to opportunity, and neighborhood health and safety. The survey was translated into over ten languages and distributed online and in paper copies at multiple meetings, events, and locations across the city.
Over 1,700 responses were collected from a large demographic of residents across the region.

- **What is AFFH? Survey**: Distributed by the Human Rights and Relations and Planning Department over the last two years. Questions were focused on experiences of discrimination. This survey was also translated into multiple languages.

- **Refugee Housing Survey**: Conducted at Lutheran Family Services with the aid of translators to refugee families. This abbreviated survey focused on new refugee families and their personal challenges in obtaining housing in Omaha.

- **Tax Increment Financing (TIF) Developer Survey**: Distributed by City Planning staff to a select group of TIF developers to gain feedback on the challenges and benefits of developing affordable housing in Omaha.

On October 24th an **Affirmatively Furthering Fair Housing Forum** was held at the Scottish Rite Center. The purpose of this regional public meeting was to reflect back to the community what was heard during the period of public engagement from June through September of 2017. Attendees were able to see the data gathered from a variety of meetings and surveys and gain a better understanding of how that information was used by regional leaders to identify both jurisdictional and contributing factors to fair housing. Attendees also had the opportunity to share written comments and concerns on regional priorities and strategies and suggestions to overcome barriers in access to opportunities. The event also included speakers on key topics related to the AFH including the disability community, fair housing policy, and transportation. The comments from attendees at the forum echoed the concerns expressed during the engagement period. The community’s greatest priorities include:

- More affordable housing across the region but especially along transit routes and near major employers
- More housing and transportation for the disability community
- Increased investment in the form of jobs in R/ECAP areas
- Addressing deteriorated housing stock in R/ECAP areas
- More effective affordable housing policy and more education about fair housing policy
- More single family affordable, elderly affordable, and multifamily affordable housing across the city

For more details on the community engagement process, see Section III. Community Participation Process.
Part IV Key Findings

OMAHA

A summary of the Assessment of Fair Housing findings are included below. The information is organized according to topics designated by HUD for fair housing analysis focused on the seven federally protected classes: race, color, religion, sex, disability, familial status, and national origin.

HUD provided an AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. Tables and maps that informed this summary can be accessed online at: https://egis.hud.gov/affht.

Segregation/Integration
Redlining practices that began in the 1930’s shaped Omaha into a city divided by race/ethnicity. Although these federally supported segregation practices ended with the Fair Housing Act of 1968, segregation remains moderate to high throughout the City of Omaha. The majority of minority households in the city are concentrated in Northeast and Southeast Omaha. Many neighborhoods to the west of 72nd Street have majority White households. These communities are the most insular, some having population where over 90% of the residents identify as white.

Contributing factors of segregation include:
- Community Opposition
- Lack of private investments
- Loss of affordable housing
- Location and type of affordable housing
- Planning practices of the 1970’s
- Lending discrimination
- Source of income discrimination
- Private discrimination

Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAP)
R/ECAPs are Census tracts with over 50% of the population identifying as a racial or ethnic minority group, in addition to 40% or more of the households in that same tract with an annual income that qualifies at or below the federal poverty guideline. In 2010,
there were nine Census tracts in Northeastern and Southeastern Omaha that qualified as R/ECAPs. Based on 2016 data, there are six R/ECAPs remaining in the eastern portion of the city.

The R/ECAPS in Northeastern Omaha have large percentage of Black households, while those in the Southeastern part of the city have large percentages of Hispanic households. Limited English Proficiency (LEP) households, including refugee and new immigrant families, have also settled in large numbers in these areas. These R/ECAP areas have the highest rates of unemployment, oldest housing stock, most significant housing problems, and greatest risk of environmental hazards including lead and asbestos. The R/ECAPS areas also have a large amount of affordable and publicly supported housing. The lack of affordable housing and publicly supported housing options outside of these areas makes mobility or housing choice for low-income families very difficult.

Contributing Factors to R/ECAPs:
- Community opposition
- Private discrimination
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of private investment in specific neighborhoods
- Lending discrimination
- Location and type of affordable housing
- Lack of affordable housing in a range of units and sizes
- Source of income discrimination
- Occupancy codes and restrictions
- Siting selection policies, practices, and decisions for publicly supported housing

Disparities in Access to Opportunity
HUD designated five categories for the analysis of disparities in access to opportunity: Education, employment, transportation, low poverty neighborhoods, and environmentally healthy neighborhoods.

Education:
Data for Omaha regarding access to proficient schools shows barriers in opportunity for students who are Black, Hispanic, and Native American. The impact of segregation on housing patterns within the city has created significant differences in the demographic makeup of the four public school districts in Omaha. Most HUD data focuses on public schools; however, public engagement and local data confirm that disparities in access to education are observed in the birth-to-five population.
Based on the location of each school district, Omaha Public Schools (OPS) is providing support to a large majority of students in Omaha who are part of federally protected classes based on race, color, and national origin. While the City of Omaha has a White population that makes up 69% of all residents, only 28% of all students who attend OPS identify as White. Additionally, OPS has a significantly higher percentage of students from low to moderate income households, and the majority of English language learners across all four districts.

When mapping public schools by Nebraska’s state performance guidelines, all schools rated as “excellent” are found to the west of 132nd Street. The majority of schools rated “great” or “good” are found west of 72nd Street. The majority of schools east of 72nd Street are categorized as “needs improvement.” Households living east of 72nd Street have less access to proficient schools. Because the majority of Non-White households are located east of 72nd Street, there is less access to proficient schools for minority families in Omaha.

Contributing factors to access to disparities in access to education include:
- Segregation
- Location of proficient schools and school assignment policies
- Distribution of resources across school districts

**Employment**

Analysis of HUD data regarding employment focused on engagement in the labor market and proximity to jobs. According to HUD’s Labor Market Index, which measures education attainment and employment rates, Black and Hispanic residents have the lowest index scores in the jurisdiction. Black households also have the lowest job proximity index scores in the Omaha area. Although HUD maps show fairly equal distribution of job proximity index scores across the city, maps based on Census data, the location of major employers, and highest areas of unemployment indicate a mismatch between unemployed residents and corridors of employment.

R/ECAP Census tracts have rates of unemployment that are three times as high as the county average indicating barriers to employment for protected classes. Community input and local data indicates a lack of access to proficient education. This lack of job skills and training may contribute to the high unemployment rates of minority residents living east of 42nd Street. Additionally, a concern of lack of access to reliable transportation was commonly expressed throughout the community engagement process.
Additional contributing factors to disparities in access to employment include:
- Location of employers
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods including services and amenities

**Transportation**

HUD’s indexes for low transportation costs and transit trips are limited by the limitations of the population included in the data. A more accurate representation of access to transportation was created using federal and local data combined with Metro Transit data. There is a need for more transportation from Northeast and Southeast Omaha to areas of major employment in Southwest Omaha. Increasing hours and frequency and/or types of public transportation would help low to moderate income residents who depend on using public transportation for employment. Multiple comments were made in the community participation process expressing a need for more affordable housing along public transportation routes.

Another commonly expressed concern by community members is a lack of access to transportation for the disability community. This was mentioned as a major barrier to accessing other opportunities and resources. Challenges in affordable and accessible transportation for persons with disabilities impact their access to work, school, medical facilities, places of worship, and social activities. Lack of sidewalks and the condition of sidewalks was also mentioned as an obstacle to reaching public transportation.

Contributing factors to disparities in access to transportation:
- Availability, type, frequency, and reliability of public transportation

**Access to Low Poverty Neighborhoods**

When comparing HUD and local data regarding protected classes in Omaha, Black, Hispanic, and Native American households have the least access to low poverty neighborhoods. These minority households are more likely to live in areas with higher poverty rates. Segregation and a lack of affordable and publicly supported housing to west of 72nd Street contribute to the disparities in access to low poverty neighborhoods for Non-White households.

The need for more diverse and mixed income neighborhoods was expressed in the community participation process. An activity held during community open houses across the city included a station where residents selected solutions for housing issues identified in their area. The “creation of more mixed income neighborhoods” was a solution that residents chose to solve the following issues:
- Concentration of racial and ethnic minorities in low income communities
- Discrimination/institutional racism
- High quality schools not equally distributed throughout the region

Additional contributing factors in disparities in access to low poverty neighborhoods:
- Location and type of affordable housing
- Access to financial services
- Private discrimination
- Lack of access due to high housing costs
- Impediments to mobility
- Lending discrimination
- Lack of resources for fair housing agencies and organizations

**Access to Environmentally Healthy Neighborhoods**

HUD data for access to environmentally healthy neighborhoods was limited to federal data focused on air quality. Local data and data provided by the Environmental Protection Agency (EPA) were used to provide a more accurate analysis. Exposure to lead hazards, poor housing maintenance, and asthma triggers are significantly higher in eastern Omaha where there is older housing stock, fewer families with resources with which to maintain their homes, less education about home maintenance, fewer landlords engaged in active property maintenance, more industries, more transportation routes, and a more densely built environment. These same areas contain Omaha’s R/ECAPs, and highest concentrations of minority households.

Throughout the community engagement process, concerns for environmental issues related to aging housing stock were mentioned. Regional fair housing survey respondents listed the concerns with environmental health and housing including: insects, radon, mold, noise, and lead.

Contributing factors to disparities in access to environmentally healthy neighborhoods:
- Location of environmental health hazards
- Environmental concerns associated with deteriorated and abandoned properties

**Disproportionate Housing Needs**

An analysis of household demographics and disproportionate housing needs shows Hispanic, Black, and Native American households experience the most housing and severe housing issues. HUD’s definition of “housing problems” includes: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30% of household income. Housing problems defined as “severe” include the same issues of incomplete facilities and overcrowding, but include cost burden greater than 50% of the household income. Families with more than five
people and households that are comprised of multiple unrelated residents have the most issues with overcrowding.

Local data and information collected through public participation suggests a need for the following types of housing:

- Rental units considered affordable (30% or less) for households with an annual income of less than $19,000
- Affordable housing for larger families
- Affordable accessible housing for the disability community and aging residents
- Affordable and mixed income multi-family housing

Publicly Supported Housing Analysis

Omaha Housing Authority (OHA) and Douglas County Housing Authority (DCHA) provided analysis regarding publicly supported housing in Omaha. According to OHA, Hispanic households and Asian/Pacific Islander households are under-served in every publicly supported housing program. Black and Hispanic households represent a disproportionate share of Omaha’s low income households. Both Housing Authorities mentioned a need for more publicly supported housing for large families and for more publicly supported housing units that are accessible for persons with disabilities. Transportation is listed as a challenge for many persons living in publicly supported housing by both OHA and DCHA. There is also a need for more affordable in-home or community based services for persons with disabilities living in public housing.

A lack of publicly supported housing west of 72nd Street was mentioned throughout the community engagement process. Although only a few publicly housing developments are located within the R/ECAP Census tracts, they tend to be very large developments. Cultural attitudes regarding race and poverty and a lack of participation from landlords west of 72nd Street are challenges to providing more options to increasing the number of Housing Choice Voucher participants and other publicly supported housing programs in high opportunity areas.

Contributing factors/barriers to publicly supported housing:

- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Deteriorated and abandoned properties
- Source of income discrimination
- Lack of access to opportunity due to high housing costs
- Impediments to mobility
- Quality of affordable housing information programs
- Access to publicly supported housing for persons with disabilities
Lack of affordable accessible housing in a range of sizes
- Lack of affordable in-home or community based services for persons with disabilities
- Lack of meaningful language access

**Disability and Access**

Analysis of disability and access was completed by City of Omaha Human Rights and Relations staff. As mentioned in previous sections, concerns regarding lack of access to opportunities and disproportionate housing needs for the disability community were also commonly mentioned at events and in activities related to public participation. A major barrier for persons with disabilities is housing insecurity. Many people with disabilities depend on limited/fixed incomes. There is an insufficient supply of affordable housing, especially rental units for households making less than $19,000 annually. Current standards for Supplemental Security Income (SSI) make securing accessible affordable housing difficult. Over 30% of the persons with disabilities in our community reside in the North Omaha and South Omaha area where most of the public housing, Project Based Section 8, and other Multi-family and Housing Choice Voucher (HCV) Program housing are located.

Community input and stakeholder meetings suggest a need for more programs to provide accessibility modifications for persons with disabilities and more transportation options for the disability community.

**Contributing factors/barriers to Disability and Access:**
- Source of income discrimination
- Access to transportation
- Location of accessible housing
- Occupancy codes and restrictions
- Lack access to opportunity due to high housing costs
- Lack of affordable accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based services
- Access to publicly supported housing

**COUNCIL BLUFFS**

The City of Council Bluffs and Municipal Housing Agency (MHA) worked together to complete the City’s AFH. In order to identify contributing factors, the City and MHA analyzed each HUD contributing factor as it relates to Council Bluffs and its citizens. From there, the list was prioritized based on research findings and public feedback.
Together, the following fair housing issues and corresponding contributing factors were identified:

**Segregation**
1. Cultural attitudes regarding race and poverty
2. Access to publicly supported housing for persons with disabilities
3. Lack of assistance for transitioning from institutional settings to integrated housing

**Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods**
1. Location and type of affordable housing
2. Lack of access to opportunity due to high housing costs
3. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
4. Lack of resources for fair housing agencies and organizations

**Disparities in Access to Opportunity: Access to Environmentally Healthy Neighborhoods**
1. Location of employers
2. The availability, type, frequency and reliability of public transportation

**Disparities in Access to Opportunity: Access to Employment**
1. Location of employers
2. The availability, type, frequency and reliability of public transportation
3. Inaccessible buildings, sidewalks, pedestrian crossings or other infrastructure

**Disproportionate Housing Needs**
1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Lack of local or regional cooperation

**Publicly Supported Housing**
1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes

**Disability and Access**
1. Lack of assistance for transitioning from institutional settings to integrated housing
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Source of income discrimination
6. Lack of local public fair housing enforcement

Fair Housing Enforcement, Outreach Capacity and Resources
1. Lack of local public fair housing enforcement
2. Lack of resources for fair housing agencies and organizations

BELLEVUE

Demographics
- According to 2015 ACS, total population of 54,067; this is an 8% increase from 2010.
- Minorities continue to make up similar percentages through the past 20 years, while the Hispanic population has grown 9% to make up almost 13% of the total population.
- While the Hispanic population has grown, the overall Limited English Proficiency (LEP) has only increased to 4%.

Segregation/Integration
- Dissimilarity index values indicated low segregation overall in Bellevue.
- Slightly higher percentage of Hispanic residents live in central and north central Bellevue. Maps indicated segregation of Hispanics north of Harrison Avenue in Omaha/Douglas County.
- Overall, Bellevue has higher percentage of homeowner compared to renters. When looking at race, more White households are homeowners, while Black, Hispanic, Asian, and Native American are renters.

Education
- Index Values indicate no particular protected class has excessively better or worse access to education.
• Non-Hispanic, Black residents living below the poverty line school proficiency index is significantly lower than Black total population index value.
• The total population of Native American, Non-Hispanic students have a lower school proficiency index than those living below the poverty line.

Employment
• Native Americans are faced with living the furthest distance away from employment centers.
• Limited public transportation options in Bellevue discourage those without personal transportation from living a significant distance away from employment centers.
• Bellevue has relatively high labor market index values across all races.
• Bellevue’s population tends to be more engaged with the labor market.

Transportation
• Due to limited availability of public transportation, Bellevue residents face higher transportation costs.
• Bellevue residents have a mean travel time to work of 20.7 minutes.

Access to Low Poverty Neighborhoods
• Overall, Bellevue residents have a higher likelihood of living in neighborhoods of lower poverty.
• The Black Non-Hispanic population living below the poverty line have a significantly higher likelihood of living in neighborhoods with higher concentrations of poverty.

Disproportionate Housing Needs
• Although Native American households make up the smallest percentage of Bellevue households, they experience significantly higher rates of housing problems and severe housing cost burden compared to other race and ethnicities.

Publically Supported Housing
• Bellevue is faced with a lack of publicly supported housing

Disability and Access Analysis
• Due to the age of housing in Bellevue, it is reasonable to conclude that the majority of housing units are not accessible including publicly supported housing.
• Of the 21,745 units, 17,230 units were built prior to 1991 and fair housing requirements.

Part V Fair Housing Goals

Below the goals for the NE-IA Region and each participating jurisdiction are listed. Detailed information on the goal setting process is located in Section VI of the AFH under Fair Housing Goals and Priorities.

Goals NE-IA Region

1. Increase accessibility of public transportation through education, outreach, and advocacy:

   • Work with the Regional Coordinated Transit Committee (CTC) Education and Advocacy committee to provide education and increase outreach regarding methods of public transportation, ride sharing services, and accessibility.
   • Assist Metro Area Planning Agency (MAPA) in developing and disseminating a resource guide with options and/or requirements for specific transit programs.
   • Partner and advocate for supportive land use policies regarding transportation.

2. Expand mobility for housing choice voucher holders in high opportunity areas:

   • Increase the quality of outreach to landlords about housing choice programs.
   • Create a resource for voucher holders to understand and evaluate options that meet their needs.
   • Evaluate policies for setting payment standards between regional housing authorities.

3. Increase the supply of housing units for residents who are disabled and/or elderly across the region with a special focus on high opportunity areas:
• Petition the states of Iowa and Nebraska to incentivize development of affordable and accessible units in housing projects that receive state funding.

• Housing and Community Development Divisions will advocate for providing an allotment of housing rehab funds for accessibility modifications.

• Jurisdictions with HOME Investment Partnership Program (HOME) funds will revise HOME applications to include criteria or the accumulation of points for development of accessible affordable housing in areas of high opportunity.

• Regional partners will work to amend building codes to include universal design standards.

4. Develop public-private partnerships with Housing Development divisions, the business community, and philanthropic groups to increase private development in R/ECAP, low-income, and high-poverty neighborhoods:

• Create partnerships with the Greater Omaha Chamber of Commerce and philanthropic groups

• Find a currently established group to focus energy and resources to create an asset inventory on a neighborhood level and a regional economic development level.

• Find opportunities to regionally coordinate to apply for economic development opportunities.

5. Improve the environmental health of neighborhoods (with a focus on those in areas identified as meeting the requirements for federal assistance) by addressing deteriorated and abandoned properties, walkability, and transportation options:

• Research best practices, evaluate programs, and make recommendations to improve the process currently in place to address properties with code violations.

• Increase awareness of programs and agencies that may assist with hazard abatement.

• Promote information on how and where to report code violations.

6. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing throughout the region:

• Public housing agencies from the region will attend meetings among human service providers regarding supportive services.
• Evaluate opportunities for housing agencies to partner with regional service providers in moving resources to supportive services to increase stability for public housing residents.
• Attend Metro Area Continuum of Care meetings to collaborate and share information.

7. Creation of a Task Force to help promote fair housing goals, increase access to opportunity for protected classes, and prevent further inequity in housing:
  • Advocate, educate, and disseminate fair housing information.
  • Ensure the completion of Analysis of Impediments (AI) goals in a timely manner.
  • Cost-benefit analysis of current regional policies impacting housing and development.

8. Provide a central fair housing resource to support education and access to opportunities in the region.
  • Create a dynamic website where regional residents can find updates on goals to the community, the AI initiative, information about fair housing resources, and links to partnering organization and services.
  • Work with the Mayor's Fair Housing advisory board to create a marketing plan to promote the fair housing website across the city.

**Goals City of Omaha**

1. Increase the amount of affordable housing stock in high opportunity areas in Omaha:
   • Collaborate with the Heartland 2050 Housing Affordability and Funding working group to promote education and advocacy for affordable housing across the city.
   • Evaluate current incentives for the development of affordable housing and look for opportunities to expand and increase incentives.
   • Create a mechanism for prioritizing fair and affordable housing elements in the proposal and selection process of projects requesting federal and state funding through City Planning Department programs.

2. Outreach to Omaha's refugee and new immigrant populations with tools that provide information regarding local rights and duties of landlords and tenant rights and responsibilities in order to help prevent against private discrimination:
• Creation of brochures regarding landlord tenant laws, rights, and responsibilities and contact information for reporting discrimination in the six most widely spoken languages in addition to English for the region.
• Create a video on landlord tenant rights and responsibilities for those who may not be able to read in their native language.
• Conduct workshops presenting landlord/tenant information, rights and responsibilities to multiple refugee and new immigrant populations.

3. Provide opportunities for community conversations on topics related to the history and future of segregation and integration in Omaha:

• Create opportunities for community-led events focused on stigma and stereotypes about race and poverty, redlining, and neighborhood revitalization.
• Seek opportunities to promote public art installations that reflecting the history of segregation and/or the conversations held about integration and moving forward together as a community.
• Meet with City Council members and provide information on the potential impacts of Sanitary Improvement District (SID) annexation on segregation and accessibility.
• Work to increase neighborhood capacity and support neighborhood-based planning

4. Increasing awareness and access for the disability and LEP communities in all City of Omaha programs and communications:

• Address communication for Limited English Proficiency (LEP) communities and Americans with Disabilities Act (ADA) accessibility statements for all City communications and public engagement.
• Training for all city managers on available resources for translation and ADA accommodations provided through the Human Rights and Relations Department.
• Work to identify liaisons in the community that can assist the City in reaching out to the LEP community for events and with program opportunities.

5. Provide mobility and/or affordable housing options for elderly and disabled populations who currently live in homes with multiple floors but cannot access or use amenities while simultaneously opening up opportunities for large family housing to serve refugee and new immigrant populations:

• Identify/find/recruit development partners interested in investing in affordable aging/disabled housing.
• Find a non-profit partner to help facilitate education on benefits of living in housing designed to provide amenities specifically for the aging/disabled population.
• Work with non-profit partners to prepare refugee/new immigrant families for home ownership and/or renting homes that become available.

6. Increase funding for programs focused on demolition or rehabilitation of abandoned buildings and the sustainable management and development of vacant lots in eastern Omaha:

• Create a team including the City of Omaha, Omaha Municipal Land Bank, and Habitat for Humanity who can create a strategic plan and leverage funds to address abandoned and vacant properties and improve the quality of life in neighborhoods in R/ECAP areas.
• Work to diversify funding for rehabilitation of homes and vacant lots and use current redevelopment plans to identify places for projects/strategic use of funds to improve neighborhoods in R/ECAP areas.
• Identify best practices for sustainable and low maintenance vacant lot management in R/ECAP areas.
• Explore funding sources to help persons who qualify as 60% or less of Average Median Income (AMI) who live in R/ECAP areas maintain their homes and avoid code violations.

7. Reduce barriers to infill development in R/ECAP communities:

• Research infill development best practices for cities with similar size and demographics.
• Identify and address barriers through research and design of local codes.
• Implement zoning practices that meet the needs of neighborhoods and encourage infill.

8. Create an effective communication network between City Departments and the community:

• Create a new public engagement strategy for Housing and Community Development to disseminate and collect information from residents/neighborhoods/stakeholders.
• Create and distribute presentations on AI data to share with neighborhood and community groups.
• Hold workshops for the public on city departments and processes.
Goals Douglas County Housing Authority (DCHA):

1. Promote, educate, and advocate for building new housing developments in high opportunity areas within a range of sizes and for a variety of household types and levels of income.
   - Educate private landlords, developers, public entities, and network with service agencies as opportunities present. (ongoing)
   - Develop informational materials for local governments and community organizations to use to for public education regarding the need for affordable housing. (by 1/2019)
   - Coordinate with private developers and partnering agencies for “mainstream housing” vouchers for persons with disabilities (nonelderly). (by 10/2018)
   - Research housing trust funds (i.e. Oregon) to determine feasibility of incentive housing for HCV recipients (by 6/2019)

2. Promote and advocate for additional transportation options in currently underserved (transportation) areas of the county (i.e. Western Douglas County). (ongoing)
   - Request a seat and attend transportation committee meetings (by 7/2018).
   - Develop a directory of current case management, social service providers, churches and transportation grant holders for underserved (transportation)(by 6/2019)

Goals Council Bluffs

1. Increase quality and number of affordable housing units for a variety of household types.
• NeighborWorks Home Solutions becomes Community-Based Development Organization (CBDO) by December 2018
• Advocate and prioritize funding for seniors and affordable housing along transit corridors, and in close proximity to health care, retail, and recreational facilities (Ongoing)
• Provide emergency assistance for the immediate repair and correction of hazardous housing conditions, which represent a threat to the health, safety, and well-being of the occupant(s) (Ongoing)
• Target the use of CDBG funds to support economically viable rehabilitation in homes for low-income members of protected classes to enable them to remain in their properties (Ongoing).
• Increase the number of housing options with more than 3 bedrooms by 5% in the next 10
• Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation by 2020.

2. Promote opportunities to move homeless into stable permanent housing.

• Increase the number of permanent supporting housing options for the chronically homeless by 5% in 10 years
• Increase the number of handicap accessible permanent supportive housing options for the chronically homeless by 3% in 5 years.
• Continue support of nonprofit agencies providing homeless services in Council Bluffs (Ongoing)

3. Improve the environmental health of Council Bluffs.

• Return vacant and blighted properties back into productive use by analyzing disposition policy and recommending changes and applying for EPA Brownfield grants (Ongoing)
• Explore funding opportunities for Healthy Homes program to protect property occupants from environmental hazards including lead-based paint and improve energy efficiency. Lead safe and mold free (July 2019)
• Work to reduce flooding within Council Bluffs by exploring new policies and practices around stormwater management (Ongoing)
• Attend the 2018 National Lead and Healthy Housing Conference

4. Increase knowledge of local assistance programs and fair housing laws to disabled, limited English, and high poverty populations including but not limited to private businesses, nonprofit assistance and City programs.

• Revise and expand Language Access Plan (LAP) by December 2019
• Expand fair housing outreach, education and enforcement activities and continue support for housing counseling agencies to provide tenant counseling to enable low-income households to remain in their rental units (Ongoing)
• Establish a fair housing education FAQ for landlords, realtors, and lenders and continue to focus programs and activities to prevent housing foreclosure and displacement (December 2018)
• Utilize various media outlets to inform the public about issues related to fair housing programs and reports

5. Work with local employers to increase the number of quality jobs.

• Adopt economic development strategies that target development, retention and expansion of firms and industries that provide living wages (December 2018)
• Provide support to nonprofit groups to assist low-income families in accessing programs to increase household financial stability (Ongoing)
• Assist Advance Southwest Iowa Corporation with their business assistance, retention, expansion and new to market business programs (Ongoing)
• Work with Iowa Western Community College for technical training programs geared toward specific jobs

6. Utilize outside funding sources to better leverage resources for local community development projects.

• Provide leveraged financing and recommend allocating federal funding and Low Income Housing Tax Credits (LIHTC) for mixed-income projects that are consistent and support redevelopment plans in priority areas (Ongoing)
• Establish ongoing meetings with the state of Iowa to discuss housing policy and other issues related to community development (June 2018)
• Revise footprint of City’s Neighborhood Revitalization Strategy Area to meet changes in demographics (December 2019)
• Advocate the Council Bluffs Housing Trust Fund to provide funding at a higher percentage to disabled persons and low-income persons (June 2018)

7. Improve and increase Council Bluffs transportation options including public transit, trails and sidewalks to benefit all citizens of Council Bluffs.

• Form partnerships between local governments and private employers to develop transportation options that connect low income and protected populations with job opportunities
• Adopt and implement complementary mobility options such as walking, biking car sharing
• Plan and execute a Bus Ridership program for Human Services/Resource Professionals
- Provide information to the Southwest Iowa Transportation Authority and other transportation providers regarding potential bus routes that would meet current needs within the CB community

**Goals CBMHA**

1. Expand mobility for housing choice voucher holders in high opportunity areas.

   - Hold a stakeholder meeting with local landlords and housing choice voucher program staff to discuss what type of information would be most helpful to have and share with landlords (December 2018).
   - Create a landlord survey in order to collect data about participation in the housing choice voucher program including why landlords do or do not participate in the program and what incentivizes or prevents their participation (June 2019).
   - Research best practices in housing choice programs for cities similar to the Omaha region (December 2019).
   - Present survey results and best practices at annual event for landlords (June 2020).

2. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing.

   - Municipal Housing Agency will maintain partnership with Human Services Advisory Council (2018-2023).
   - Municipal Housing Agency will work closely with local human services agencies to provide tenants with contact information of services they may be able to utilize (2018-2023).
   - Municipal Housing Agency will work to create a guidebook of local human services agencies to provide tenants/participants with information of services they may be able to utilize (December 2018).
   - Municipal Housing Agency will develop life skills curriculum and teach classes in the area of budgeting, housekeeping, and other life skills areas (December 2018).
   - Municipal Housing Agency will teach classes in the area of budgeting, housekeeping and other life skills (2018-2023).
   - Municipal Housing Agency will develop relationships with outside entities to provide information and resources for tenants in the area of life skills (2018-2023).

3. Renovate current units to make more accessible to tenants.
- Municipal Housing Agency will continue to apply for grant money through the Council Bluffs Housing Trust fund to renovate current units to make them more accessible (2018-2023).
- Municipal Housing Agency will work with local contractors to provide renovations to current units with money gained through Housing Trust Fund grant (2018-2023).
- Municipal Housing Agency will work with tenants to meet needs through Reasonable Accommodations to renovate units to make them more accessible (2018-2023).

**Goals Bellevue**

1. Increase affordable housing opportunities to expand housing choice by increasing quality and quantity of affordable housing units and the number of participating landlords in the jurisdiction.
   - Research partners and funding sources to conduct a housing market study for the community and identify opportunities to use the study to enhance development and developer partnerships
   - Review possible developer incentives to increase development of affordable housing and meet with necessary partners to develop, prepare and adopt incentives.
   - Determine prospects to increase the available funding and programs for housing rehabilitations programs in the community.
   - Work with City officials and departments to review current criteria for determining city project need to include accessibility and housing issues.

2. Identify opportunities to safeguard current and future zoning ordinances to encourage the development of affordable housing stock as well as utilize occupancy requirements that do not hinder fair housing choice.
   - Work with local planning department to review current land zoning and develop proposal to increase multi-family zoning.
- Increase infill development opportunities by reviewing regulations and best practices to identify possible changes to the current regulations and develop proposals.
- Research opportunities to increase the percentage of newly constructed housing units that are affordable and accessible to people with disabilities.

3. Provide opportunities to alter the perceptions of community exclusion and diffuse opposition to affordable housing through knowledge and education.

- Research proactive marketing strategies to enhance community image and identify community stakeholders to assist with development of community strategies to propel movement forward.
- Identify possible funding sources to assist with marketing strategies specific for the community.
- Identify prospects to address Bellevue’s aging infrastructure and necessary updates to ensure all residents have accessibility to services.
- Work with the City of Bellevue ADA Committee to review current status of ADA Transition plan and infrastructure needs in the community along with identifying funding sources for assistance.
- Develop programs and assistance to address housing accessibility modification needs.

4. Increase homeownership opportunities through financial literacy and promoting equitable access to credit and home lending.

- Identify partners, specifically lending agencies, to assist with reviewing current lending concerns to identify areas of opportunities for education and assistance.
- Enhance educational materials and expand distribution and availability of materials.

5. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.

- Conduct asset mapping project to locally available housing and public services.
- Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
• Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

6. Increase the overall knowledge and understanding of fair housing with the community’s developers, real estate professionals, financial institutions, elected officials and residents.

• Identify interested partners to facilitate fair housing workshops for landlords and housing providers
• Share and distribute fair housing information for renters.
• Work with local multi-family housing providers to provide information and education about fair housing to management officials and tenants.

Goals BHA

1. Work to change community perceptions of opposition and community exclusion.

• Determine the feasibility of adding source of income as a protected class and research other community best practices.
• Assess the community and elected officials’ buy-in for the addition of a protected class to prevent discrimination in housing choice.

2. Develop access to publicly supported housing for all residents.

• Review and develop a Limited English Proficiency Plan with assistance for other community organizations and stakeholders.
• Review housing needs compared to make up of the waiting list to determine need for accessible units and draft proposal to make necessary modification.

3. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.

• Conduct asset mapping project to locally available housing and public services.
• Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
• Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.
• Review best practices and options for admissions and wait list policies and implements and proposed changes.
• Assist with implementation of a housing navigator program and research additional funding sources for continuation of the program.

SECTION I

Community Participation Process
Section III. Community Participation Process

HUD requests information from the community engagement period to be organized into four parts:

Part I
Outreach Activities and Methods of Engagement

Part II
Community Organizations Consulted

Part III
Evaluation of Community Participation

Part IV
Summary of Comments and Participation
Part I Outreach Activities and Methods of Engagement

The Cities of Omaha, Council Bluffs, and Bellevue, Council Bluffs Municipal Housing Agency, Bellevue Housing Authority, Omaha Housing Authority, and Douglas County Housing Authority, partnered in the public participation process. As entitlement entities, the partnership was mandated by HUD to complete a robust community engagement process for the Assessment of Furthering Fair Housing. The public participation process involved extensive conversations with multiple groups and individuals regarding the disparity in opportunities for all protected classes as determined by HUD. Multiple methods were used to engage various stakeholders and community members in an effort to be inclusive of people in all protected classes.

A number of government agencies, nonprofit organizations, philanthropic foundations, and other stakeholders across the Omaha-Metro Area continue to work to educate, enforce, and support fair housing activities. Fair housing advocates in the region address inequity in issues related to housing including historical patterns of segregation and ongoing housing discrimination by increasing access to opportunity.

Community partners collaborated with Metropolitan Area Planning Agency (MAPA) on a public engagement strategy to achieve public participation goals. MAPA assisted in facilitating a number of stakeholder meetings, public open houses, public forums and community events. MAPA identified stakeholders and advocacy groups in specific categories related to fair housing. These included: Housing problems and disparities, access to education, employment, transportation, environmentally healthy neighborhoods, disability, and issues concerning publicly supported housing. Meetings were held at MAPA’s main offices, libraries, community, community centers, and conference centers.
The stakeholder meetings identified fair housing issues facing the region and developed strategies to mitigate those problems. The majority of these meetings included a presentation on the AFFH process, fair housing history, the content requirement of the AFFH document, setting fair housing priorities, and community goals. Federal and local data was shared with attendees to inform discussions.

Presentations were followed by breakout sessions and reflection activities. Attendees participated in discussions regarding prevalent issues, contributing factors, and strategies.

Small groups were asked to answer the following questions:

1. Identify the most prevalent fair housing issue in the region
2. Identify what factors contribute to fair housing issues/discrimination
3. How would you address these problems and where are the protected classes that are impacted by these issues?

Answers from small groups were reported out in order to identify common themes. A facilitated discussion followed in order to determine prevalent housing issues, contributing factors, and strategies from each stakeholder or community group.

**Stakeholder meetings include:**

| Non-profit/Community Housing Advocacy Groups | June 15, 2017 |
| Disability Community                        | June 15, 2017 |
| Development Community                       | June 16, 2017 |
| Transportation Group                        | June 28, 2017 |
| Omaha LGBTQ Group                           | July 19, 2017 |
| Latino Community                            | July 21, 2017 |
| Omaha Businesses                            | August 4, 2017 |
| North Omaha Stakeholders                     | September 9, 2017 |
| Lending Institutions                         | June 16, 2017 |
| University of Nebraska Omaha Service Learning Class | September 13, 2017 |
| Bellevue Housing Developers                 | October 5, 2017 |
| LGBTQ Focus Group                           | July 19, 2017 |
| Landlord Outreach Breakfast                 | June 27, 2017 |
| Council Bluffs Development Community         | July 19, 2017 |
| Bellevue Public Meeting                     | September 15, 2017 |
| Bellevue Public Schools                     | September 15, 2017 |
| Minority Homeownership Committee             | August 11, 2017 |
Open houses were scheduled in locations across the region to provide convenient and meaningful opportunities for residents to give their feedback on fair housing. All locations for open houses were ADA accessible. A station with activities for kids was included for participants who may need to bring their children to the open house.

Open house format:

1. Residents were greeted when entering and asked to sign in to receive updates on the progress of the project. They were also given a handout with information about the Regional Fair Housing Survey.

2. The purpose of the first station was to explain the AFFH process. The station included maps focused on demographics, housing burden, employment centers, and public transit lines. Each station had program partnership staff available to answer questions or provide information on maps and the AFFH process.

3. The second station, “My Dream of Omaha”, was created to identify desirable locations for housing and conditions that make them desirable. Residents were able to indicate on a map where they would live if they could live anywhere in the region. Attendees were encouraged to provide written comments on why they selected that location in the area. If the location selected was their current neighborhood, it was indicated with a heart on the map.

4. The third station was set up as an investment game. Attendees were given five chips representing federal housing dollars. Six jars were provided, each representing a strategy to combat a different housing issue. Participants placed chips in the jars indicating how they would invest in strategies to overcome housing issues in the region.

5. The fourth station addressed overcoming barriers to access to opportunity. The station included a list of the largest issues facing the region and potential solutions to address those issues (previously identified by stakeholder meetings). Residents
matched solutions with the issue they found most important. Attendees were encourage to write down additional solutions and issues.

6. The fifth station encouraged participants to indicate the top two types of housing they thought was the most needed in the region. A list was provided that included the following: Single Family Affordable, Single Family Market Rate, Multifamily Affordable, Multifamily Market Rate, Multifamily Mixed Income, Special Needs Housing, Elderly Affordable, Elderly Market Rate, and Other

7. Residents concluded their visit with “My Story” station. This was an opportunity for them to share their housing experiences. Attendees could choose to provide a of doing voice recording or filling out a worksheet answering one or more of the following questions:
   ● How has your neighborhood changed over time: (How has segregation been a part of that change?)
   ● Share your last experience in finding a home
     1. What were your greatest challenges?
     2. Did you know you have resources available to help you find a home?
   ● If you could change one thing about your neighborhood or residence, what would that be?
   ● Share your favorite landlord story, good or bad.

Figure III-1 Example of Data Collected from Community Open House
Additional results captured by the stations at community open houses in Omaha are included in Attachment A.

**Open House dates were as follows:**

- Midtown Omaha: July 17, 2017
- Southwest Omaha: July 24, 2017
- North Omaha: July 27, 2017
- Northwest Omaha: August 7, 2017
- South Omaha: August 9, 2017
- Elkhorn Omaha: September 6, 2017

Outreach efforts included attending and presenting information on the AFFH, handing out flyers or surveys, hosted tables or presentation as panel members.
Community Organization and Group meetings include:

Highland South/Indian Hills Neighborhood  August 26, 2017
Minne Lusa neighborhood Association  September 7, 2017
Binney-Wirt-Spencer Neighborhood Association  September 16, 2017
Bellevue Housing Authority Back To School Handouts  July 18-27, 2017
Village Pointe Farmers Market  September 2, 2017
Kids of the Future Center  August 1, 2017
Community Outreach at Warner Park  July 18, 2017
Deer Park Neighborhood Partners Meeting  June 21, 2017
Midtown Neighborhood Alliance  June 20, 2017
Heartland Pride Parade and Festival  June 17&18, 2017
2017 Visually Impaired community Resource Fair  April 29, 2017
Bellevue Senior Center  August 2, 2017
Aksarben Elmwood Park Neighborhood Association  July 20, 2017
Northwest Neighborhood Alliance Meeting  July 13, 2017
BET Child Care Center  August 4, 2017
Elements Child Care  August 4, 2017
Coordinating Transit Committee Meeting  June 21, 2017

Service Agencies, Advocacy Groups include:

Lutheran Family services  August 24, 2017
Rising View Housing – Bellevue  August 29, 2017
Omaha Public Schools Research Division  September 8, 2017
Omaha PFLAG Meeting  July 13, 2017
Omaha 360  July 26, 2017
One Omaha Advisory Board Meeting  June 19, 2017
Heartland 2050 housing & Development Meeting  April 13, 2017
Refugee Task Force  August 3, 2017
Leaning Community Center of South Omaha  July 12, 2017
Restoration Exchange Omaha  August 3, 2017
Habitat for Humanity  May 22, 2017
Council Bluffs Legal Aid  May 22, 2017
The Center (CB Senior Center)  May 18, 2017
Energy Assistance Service Agency  June 15, 2017
Catholic Charities  May 15, 2017
League of Human Dignity  May 18, 2017
Family Housing Advisory Services  May 18, 2017
Micah House  May 17, 2017
New Visions Homeless Services May 17, 2017
Heartland Family Services May 18, 2017

Government Entities include:

Omaha City Council Members
Bellevue City officials May 3, 2017
City of Bellevue Administration May 4&8, 2017
Council Bluffs City Council May 15, 2017
Pottawattamie County May 15, 2017
Council Bluffs Human Services Civil Rights Focus Group July 20, 2017
Bellevue chamber of Commerce September 13, 2017
Council Bluffs Community Dev. Advisory meeting June 22, 2017
Council Bluffs Civil Rights Commission July 20, 2017
Council bluffs Government Focus Group July 20, 2017
Douglas County Housing Authority Board March 25, 2017
City of Council Bluffs & MHA November 15, 2017
City of Bellevue August 28, 2017
2018 Action Plan Focus Group meeting- Special Needs June 1, 2017
2018 Action Plan Focus Group meeting – neighborhoods May 17, 2017
MHA Board of commissioners June 21, 2017

Forums, Conferences, Workshops include:

Park East/Completely Kids Community Event August 30, 2017
Realities in Housing Conference July 18, 2017
Realities in Housing Conference November 17, 2016
Summit on Poverty October 21, 2017
Housing Affordability Systems Mapping Workshop September 20, 2017
Mayor’s Youth Advisory Commission October 12, 2017
Transit Oriented Development Workshop October 5 & 6, 2017
Latino Conference of the Midwest August 17, 2017
Inclusive community Table Talk 2017
Ability Forum October 20, 2017
Nebraska Investment Finance Authority (NIFA) Conference March 12, 2017
Neighborhood USA (NUSA) Conference May 24-28, 2017
Omaha Table Talks- Housing Discrimination April 12, 2017
Visually Impaired Community Resource Fair April 29, 2017
Good Life: Housing Affordability Workshop February 27, 2018

Individual Interviews:

Concerned Citizen
Gabriel Wananka August 4, 2017
UNO Service Learning Academy
Director, Julie Dierberger August 18, 2017
Omaha Multicultural Welcoming Alliance
Director, Ann Marie Kudlacz February 6, 2018
Early Childhood Services
Director, Fawn Taylor March 1, 2018
Nebraska Urban Indian Health Coalition
Director, Donna Polk April 6, 2018
Community Relations Coordinator, June Bear-Noonan

Public Housing Resident meetings:

Four of the partners, Omaha Housing Authority, Douglas County Housing Authority, Municipal Housing Agency (CB) and Bellevue Housing Authority, conducted multiple meetings with their Resident Advisory Boards and public housing residents, to gain input and feedback on their experiences and views on the disparity or burdens of housing, transportation, employment and environment. Regional surveys were provided as well.

Omaha & Douglas County joint meeting of residents August 7, 2017
Resident Advisory Board MHA May 17, June 21, June 28, November 6, 2017
Bellevue PHA residents September 6, October 16, 2017
MHA Residents November 6, 2017

Realities in Housing Conference
As part of an ongoing effort to educate lenders, real estate persons, landlords, insurance persons and residents, the Mayor’s Fair Housing Advisory Board has facilitated annual conferences to address Fair housing issues. The conference held in 2016 featured an introduction to the AFFH mandate, the history, the process and the expected results. A member of HUD presented the information to 112 real estate, lender and landlords participants. The conference held in 2017 utilized the stakeholder format to gain input and feedback from a set of questions designed for each group as well as eliciting strategies in working toward goals for the region and the jurisdictions. Again, the target invitees were real estate persons, lenders, landlords, insurance persons and residents. There were 127 participants who completed worksheets as well as some completing the regional survey.

**Individual Interviews**

Many individual interviews were held with representatives of various stakeholder agencies and groups, neighborhoods, and private industries. The interviews helped facilitate further discussion with groups most likely not engaged in the public meeting process or to facilitate additional local knowledge data, experiences and views. There has been ongoing conversations with the purpose of forming partnerships or collaborations to further the goals of this assessment. Additional meetings as well as individual discussions will continue as new connections, concerns and strategies evolve.

**Outreach to the R/ECAP Neighborhoods**

Recognizing the importance of Omaha’s neighborhood associations, city staff presented fair housing information at all Neighborhood Alliance meetings including a presentation at the One Omaha board meeting. Additionally an announcement was sent to all neighborhood leaders requesting an opportunity to present information about the regional fair housing assessment at their association meetings. A specific request was sent to the sixteen neighborhood leaders in the census tracts identified by HUD as R/ECAP tracts (Racially and/or Ethnically Concentrated Areas of Poverty). Six of the sixteen R/ECAP neighborhoods requested and received a presentation on the fair housing initiative.
AFFH Forum

A public forum was held in an open house style format that included stations with visual summaries of the jurisdictional and regional information gathered throughout the various meetings and events. The participants were able to view the various survey results, the comments and strategies derived from the stakeholder and community meetings and various maps that depicted demographics and disparities in employment, transportation, and housing. The goal of the event was to reflect to the public what the Regional partners heard during the period of public engagement and ask attendees to prioritize the most frequently mentioned concerns and issues.

The stations provided at the public forum included the following information:

- Station 1: summary of community engagement results. Comments, feedback, results from worksheets, table discussions, questionnaires, and interactive activities were presented here.
- Station 2: summary of regional survey results. The responses to questions relating to housing, transportation, discrimination and access to amenities were compiled and analyzed using graphs.
- Station 3: summary of contributing factors relevant to each jurisdiction (Omaha, Bellevue, Council Bluffs). Barriers to fair housing were identified through community engagement events, HUD data, and local resources. This station also included definitions HUD provides for fair housing categories and potential barriers.
- Station 4: summary of current regional priorities based on jurisdictions findings and feedback from the community engagement process.
- Station 5: summary of strategies and goals identified through the community engagement process. This station requested attendee input on the strategies and goals based on the information.
- Station 6: opportunity for feedback and questions. Attendees were asked to provide comments and concerns regarding the information. They were also asked to prioritize contributing factors and barriers to accessing opportunities. Staff was available to answer questions at each station.

The second half of the forum provided an opportunity for attendees to hear from speakers who are experts in areas impacted by fair housing issues. Several speakers addressed issues including: disparities in opportunities for the disability community, regional transportation needs and strategies, issues of segregation and integration, sanitary improvement districts, lack of affordable housing through policy, and the history of “redlining”, steering and other discriminatory practices.
Feedback provided by forum attendees can be viewed in Attachment B.

**Surveys**

To supplement public engagement, several surveys were developed to capture regional opinions on issues related to transportation, education, affordable and accessible housing, employment, and environmental concerns. The four main surveys conducted to identify challenges to fair housing included:

**Regional Fair Housing Survey:** Covered a range of issues related to fair housing, access to opportunity, and neighborhood health and safety. The survey was translated into over ten languages and distributed online and in paper copies at multiple meetings, events, and locations across the city. Nearly 1,700 responses were collected from residents across the region. The regional survey collected demographic data including information on race and ethnicity, gender, and sexual orientation.

This survey was distributed via websites, emails, hard copy distribution through mailings and was made available digitally as well as hard copy at meetings or accessible on laptops provided. The survey link was emailed to all City and County employees throughout the region. This survey was also distributed to youth groups whose responses were included in the overall survey results. On the AFFH website, the survey was able to be translated in 10 different languages. Specific translations for Spanish and Arabic speaking residents were also distributed in hard copies to organizations and individuals who work in new immigrant and refugee communities.

**Figure III-2 Regional Housing Respondents by Zip Code Area**
The map above shows Regional Fair Housing Survey respondents by area. The map shows the eight counties included in the regional assessment. Areas were designated based on groups of zip codes and geographic locations. The areas are shaded from dark blue to light green based on the number of survey respondents in the that location. The darkest color blue identifies the greatest number of survey respondents while the lightest green represents the fewest number of respondents. Areas shaded in light purple were included in the region, but did not have any survey participants.

Southwest Omaha had the greatest number of survey respondents at 283, followed by Southeast Omaha at 247 respondents, and Northeast Omaha with 236 respondents. The numbers reflect the participation for the survey from the time the survey opened in early June through the end of September when the survey closed online. There were an additional 77 respondents that submitted paper surveys that were received and entered in the month of October. These surveys are not included in the data reflected in the map.
or Table III-1. The table below lists the number of respondents per area and specific zip codes included for each location.

### Table III-1 Regional Fair Housing Survey Respondents

<table>
<thead>
<tr>
<th>LOCATION IN REGION</th>
<th># OF RESPONSES</th>
<th>ZIP CODES WITHIN LOCATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Midtown/Downtown Omaha</td>
<td>155</td>
<td>68102, 68103, 68131, 68132, 68182</td>
</tr>
<tr>
<td>Northeast Omaha</td>
<td>236</td>
<td>68104, 68110, 68111, 68112, 68152</td>
</tr>
<tr>
<td>Southeast Omaha</td>
<td>247</td>
<td>68105, 68106, 68107, 68108, 68117</td>
</tr>
<tr>
<td>Northwest Omaha</td>
<td>178</td>
<td>68116, 68122, 68134, 68142, 68154, 68164</td>
</tr>
<tr>
<td>Southwest Omaha</td>
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<tr>
<td>Far West Omaha</td>
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<tr>
<td>Bellevue</td>
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<td>68005, 68113, 68123, 68147</td>
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<td>La Vista Papillion Ralston</td>
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<td>68046, 68128, 68133, 68133</td>
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<tr>
<td>Rural Nebraska</td>
<td>63</td>
<td>68003, 68007, 68008, 68023, 68037, 68041, 68044, 68048, 68059, 68064, 68066, 68069, 68079, 68143, 68555</td>
</tr>
<tr>
<td>Carter Lake and Council Bluffs Iowa</td>
<td>126</td>
<td>51501, 51503, 51510</td>
</tr>
<tr>
<td>Rural Iowa</td>
<td>19</td>
<td>51521, 51525, 51526, 51542, 51551, 51555, 51560, 51561, 51563</td>
</tr>
</tbody>
</table>

Source: Regional Fair Housing Survey

Although the second largest group of survey respondents were from Southeast Omaha, where a significant portion of the Metropolitan Area’s Hispanic Community resides, only 84 survey respondents, or 5.11%, identified as Hispanic or Latino. Regionally Hispanic households makes up 8.96% of the population (HUD Table 2, Demographics). This population was under represented in the survey. Additional outreach was conducted in South Omaha, including four open house and stakeholder meetings, in an attempt to get more input from the local Hispanic community.
Additional characteristics of survey respondents are included in the infographic below.

Figure III-2 Regional Survey Respondent Demographics

Source: Regional Fair Housing Survey, Snapshot of Respondents

Additionally, the average median income in the metropolitan statistical areas is $59,803, but more than half of the Regional Fair Housing Survey respondents listed an annual household income of over $61,000. Nearly 23% of respondents stated their household earns between $32,000 and $61,000, and 22% said their household income was less than $32,000 per year. 12.63% of all survey respondents are currently living in some type of publicly supported housing or have resided in publicly supported housing in the past. A complete copy of the survey and survey analysis can be viewed in Attachment C.
Additional surveys conducted in order to focus on specific groups or issues regarding the assessment of fair housing included surveys focused on discrimination, experiences of refugee households, and members of the development community.

*What is AFFH? Survey:* This survey was incorporated into brochures which included information on the AFFH. The brochure was distributed at tables at community events, conferences and workshops by the Human Rights and Relations and Planning Department in 2016-2017. Questions were focused on basic housing issues and experiences of discrimination. This survey was also translated into multiple languages. Shown as Attachment D.

*Refugee Housing Survey:* Conducted at Lutheran Family services with the aid of translators to refugee families. This abbreviated survey focused on new refuge families and their personal challenges in obtaining housing in Omaha. Shown as Attachment E.

*Tax Increment Financing (TIF) Developer Survey:* Distributed by Omaha Planning Department staff to a select group of TIF developers to gain feedback on the challenges and benefits of developing affordable housing in Omaha. Data from this survey was incorporated into the goals for increasing the number of affordable units across the region.

**Affirmatively Furthering Fair Housing Website**

Through the Human Rights and Relations Department of the City of Omaha, an AFFH website was developed to be the repository for all AFFH information throughout the process. The website contained partner information, a calendar of events, summaries of the meetings held, the survey that was translatable, and information on the AFFH process. The site also included links to other organizations and local data. This included a link to the HUD Exchange AFFH Data and Mapping Tool and instructions for how to use the tool.

All public comments that were captured through stakeholder and open house meetings are currently available on the website. The AFFH website will be kept current throughout the process and will then become part of a larger website for Fair Housing resources as determined by a regional goal. The website can be found at AFFH.cityofomaha.org.
Video

A short video was created to inform the public of the AFFH process and invite them to participate in the stakeholder and community meetings. This video was posted on partner websites and the various city websites. The script for the video follows:

“I would like to talk to you about the Affirmatively Furthering Fair Housing Assessment commonly called the AFFH, that is being conducted in our region. All communities that receive federal funding has a responsibility to complete this assessment that includes analyzing and identifying significant contributing factors to discrimination, prioritizing the factors, setting fair housing goals and taking meaningful actions toward those goals. Through community engagement and the sharing of experiences, your voice will help to bring an awareness to the seriousness of the issues that we as a region face regarding inequality in access to opportunities. The Fair Housing Act of 1968 prohibits discrimination in housing on the basis of race, color, national origin, religion, disability, familial status and sex. There are many opportunities for you to participate in establishing realistic and attainable goals toward affirmatively furthering fair housing for all. Stakeholder meetings and community meetings are being held in your communities. Please go to the AFFH website at AFFH.CityofOmaha.org. The calendar of events is available as well as a community survey. You may also call 402-444-5065 to get a hard
copy of the survey in multiple languages and the calendar of events. It is so important that we hear from you. Take the survey, let your voice be heard. Please join us!”

Emails/Mailings

In addition to print and social media advertising, email invitations were sent out to the Heartland 2050 committee members, organizations identified as stakeholders in each focus area, previous public hearing attendees, the Neighborhood Directory leadership, vendor and business contact list and personal email lists received for reference. The emails included notification of events, invitations and updates.

Following is a listing of agencies, businesses and groups that received emails and/or mailings: (not an exhaustive list)

Non-Profit/Community Advocacy
Non-Profit Association of the Midlands, University of Nebraska-Omaha, Latino Center of the Midlands, Nebraska Appleseed, voice Advocacy Center, Omaha by Design, New leaders Council, Midlands Mentorship Partnership, Justice for Our neighbors, Empowerment Network, Heartland Family Services, Goodwill Industries, One Omaha, Eastern Nebraska Community Action partnership, whispering roots, 75 North Redevelopment, United Way of the Midlands, Urban Indian Health Coalition, YMCA, No More Empty Pots, Lutheran Family Services, Omaha Small Business Network, Omaha Healthy Kids Alliance, Watson group, LLC, Western Iowa Development Authority, 712 Initiative, Voices for Children, Nebraska Families Collaborative, Urban League of Nebraska

Disability Community
Outlook Nebraska, Nebraska medicine, CBS Home Real Estate, Omaha Public Schools, Heartland Workforce Solutions, ModeShift Omaha, ICare Counseling, Omaha Housing Authority, American Legion, Black Hills Workshop, Catholic Charities, Eastern Nebraska Community Action Partnership, friendship Program, Eastern Nebraska office of Aging, Goodwill Industries, Kids Can community Center, Metro Transit, United way of the Midlands, Southwest Iowa Transit, Sheltering Tree, Southern Sudan Community Association, Mayor’s Commission on citizens with disabilities, Heartland Family Service, Employment First

South Omaha Stakeholder Meeting
Midlands Latino Community development corporation, congressman Don Bacon's Office, South Omaha Boys and Girls Club, South Omaha Neighborhood Alliance, South Omaha Business Association, Catholic Charities, Heartland Workers Center, Peace Presbyterian, Justice for Our Neighbors, Heartland Workforce Solutions, senator Tony Vargas, City of Omaha, Nebraska Realty, Kroc Center, Arts For All, Sisters of Mercy, Omaha Public Library, Juan Diego Center, Victory Boxing Center, Metropolitan Community College, One World, Restoration Exchange Omaha, Habitat for Humanity, Omaha Together One Community, South Omaha Environmental Task Force, South Omaha Community Care Council, Intercultural Senior Center

Transportation
City of Blair, RDG, University of Nebraska medical Center, Drive Spotter, Mode Shift Omaha, Live Well Omaha, Heartland B Cycle, University of Nebraska-Omaha, Sarpy County, Metropolitan Utilities District, Metro Area Transit, DeOld Anderson Architecture, University of Nebraska Medical Center, Omaha Ambulance, Nebraska Department of Transportation, Felsburg Holt Uhlevig Engineering, HCD, Omaha Land Bank, Union Pacific, Lamp Rynearson and Associates, Omaha Bikes, Lund Company, Hush Blackwell, City of Council bluffs, Verdis Group

Omaha LGBTQIA Focus Group
AFFH Facebook Page, Inclusive Life Center mailing list, Mayor of Omaha's LGBTQIA Advisory Council, flyers distributed at Heartland Pride Parade, Human Rights and Relations Department table at Pride Festival at Stinson Park, University of Nebraska-Omaha Gender and Sexuality Resource Center and website

Development Community
Seldin Company, Faith Urban Planning, refugee Empowerment Center, NeighborWorks Home Solutions, PJ Morgan Real Estate, AAA Bank, inCOMMON Development, Omaha by Design, Tranduction Technologies, Baird Holm, LLC, Berkshire Hathaway Real Estate, Lund Company, Habitat for Humanity, JEQ Consulting, Family Housing Advisory Services, Fair Housing center, Investors Omaha, Liberty Ladies, Nebraska Taxpayers for Freedom, City of Blair, University of Nebraska-Lincoln, Olson Associates, Nebraska Investment finance Authority, Metropolitan community College, Vireo Group, Empowerment Network, Nebraska Title Company, Burlington Capital, Southeast Nebraska Development District, Holy Name Housing, GESU Housing;, Omaha Land Bank, Spar, LLC, ONE Omaha, Douglas County Health Department;, Douglas County Housing Authority, Omaha Housing Authority, NuStyle, Development, Birchwood Homes, Metropolitan Omaha Property-owners Association, Metro Omaha Builders Association, Build Omaha, Metro Area Continuum of Care for the Homeless, Sienna Francis Homeless Shelter, Open Door Mission, Stephen Center, Holland Bashem
Architects, Midtown Neighborhood Alliance, South Omaha Neighborhood Alliance, North Omaha Neighborhood Alliance, North 24th Street Corridor Alliance, Omaha Area Board of Realtors,

**North Omaha Group**
Union for Contemporary Art, North Omaha Neighborhood Alliance, North 24th Street Corridor Alliance, Neighborhood Action and Fact, Empowerment Network, North Omaha Ministerial Alliance, Urban League of Nebraska, ModeShift Omaha, Eastern Nebraska Community Action Partnership, Omaha Together One Community, Omaha Small Business Network, Urban League young professionals, Veridian Federal Credit Union, Lutheran Family services, Christ community Church, Big Muddy, United Methodist Church, Project Interfaith, Mount Nebo Baptist Church, Trinity Church, St. marks Baptist Church, Hope of glory Congregational Fellowship Church, Salem Baptist Church, St. James Nazarene Church, Sacred heart Ministries, Saint Peters Church, St. John Greek Orthodox Church, Omaha Performing Arts, First Lutheran Church, Omaha World Herald, United way of the Midlands, Omaha public Schools, Douglas County Health Department, Big Mamas Kitchen, Omaha Economic Development Corporation, Loves Jazz, Seventy Five North Redevelopment, 100 Black Men, Black Men United, Omaha Talons Athletic League

**Omaha Business Community**
Greater Omaha Chamber of Commerce, Omaha Small Business Network, Gateway Economic Development Corporation, Heartland Workforce Solutions, Omaha Convention and Visitors Bureau, Leo A. Daly, Omaha City Council Members, Urban league Young Professionals, Midlands Young Latino professional Association, Nebraska Title Company, Omaha Economic Development corporation, University of Nebraska-medical Center, Tyson chicken; oriental Trading Company, PayPal, PJ Morgan Real Estate, SAC Federal Credit Union, Cargill, Omaha Public Power District, Infinite 8 Institute, The Start Center for entrepreneurship, Do Space, Interface Web School, Omaha Code School, Omaha Startup Collaborative, Omaha Publications, Olsson Associates, Lamp Rynearson Associates, City of La Vista, City of Papillion, City of Gretna, Sarpy County Chamber of Commerce, Investors Omaha, First National Bank of Omaha

**Print Media**
Multiple flyers, brochures, fact sheets, and posters were mailed out, distributed and posted in various venues. Public notices were placed in local newspapers as required for public meetings and hearings according to the public participation plans of the partners. Flyers and other materials were translated into multiple languages including Spanish, Arabic and several Asian languages.

**Table III-2 Omaha Jurisdiction Print Media/Newspaper Advertising**

<table>
<thead>
<tr>
<th>Outlet</th>
<th>Frequency</th>
<th>Target Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Omaha Star</td>
<td>Weekly</td>
<td>Black community</td>
</tr>
<tr>
<td>El Perico</td>
<td>Weekly</td>
<td>Hispanic community</td>
</tr>
<tr>
<td>Daily Register</td>
<td>Weekly</td>
<td>Business community</td>
</tr>
</tbody>
</table>

AFFH brochures, website, flyers and AFFH fact sheets were distributed at each meeting opportunity and at all community attended events. Mail outs were done to all neighborhood association leaders and business contact lists.

*Sample flyers and posters follow: (shown smaller than published size)*
Where You Live Shapes Your Life and Your Future

Tell us what you want your home & your future to be like.
Take the AFFH Survey:

https://www.surveymonkey.com/r/AFFH2017

For more information please contact:
City of Omaha Human Rights and Relations Department at:
(402) 444-5055
AFFH.cityofomaha.org

Fair Housing is a Right. Know your Rights.
AFFORDABLE HOUSING

WOULD YOU LIKE TO MAKE AN IMPACT ON THE STRATEGIES AND GOALS OF MAINTAINING EQUALITY IN YOUR CITY? SHARE YOUR EXPERIENCES AND IDEAS! JOIN US FOR A DISCUSSION ON FAIR HOUSING ISSUES IN THE COMMUNITY.

YOUR VOICE MATTERS!

<table>
<thead>
<tr>
<th>Stakeholder Engagement</th>
<th>Community Engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday, Aug 21</td>
<td>Bob Evans User House</td>
</tr>
<tr>
<td>6:30 PM – 8:30 PM</td>
<td>UNO Interior Design CSC</td>
</tr>
<tr>
<td>Wednesday, July 26</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>3 PM – 5 PM</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>Monday, July 24</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>4 PM – 7 PM</td>
<td>Midland Branch Library</td>
</tr>
<tr>
<td>Wednesday, July 26</td>
<td>Omaha LGBTIQA+ Forum Group</td>
</tr>
<tr>
<td>8 PM – 9:30 PM</td>
<td>Lincoln Life Center</td>
</tr>
<tr>
<td>Thursday, July 27</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>Union for Contemporary Arts</td>
</tr>
<tr>
<td>Thursday, July 27</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>Thursday, July 27</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>Thursday, July 27</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>Thursday, August 10</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>Friday, August 18</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
<tr>
<td>Friday, August 18</td>
<td>Council of Affairs Meeting</td>
</tr>
<tr>
<td>8 PM – 9 PM</td>
<td>South Omaha Open House</td>
</tr>
</tbody>
</table>

CON EL CANAL DE COX Y 99 DE CENTURY LINK

FACILITE POSITIVAMENTE LA VIVIENDA JUSTA

¡DISPONIBLE YA!
directorio latino Omaha.com

SU VOZ IMPORTA!

Usted comparte sus historias sobre cómo acceder a las oportunidades en la región de Omaha. Es tiempo de transformar sus preocupaciones en objetivos y crear un plan para hacer de la viviendajusta una realidad para todos.

Únase con nosotros para el siguiente paso en la creación de estrategias para superar los retos hacia una vivienda justa. Vea los resultados de las reuniones comunitarias y de las encuestas regionales y vote por sus prioridades fundamentales. ¡No pierda la oportunidad de ser parte de una solución!

Para más información visita: affh.cityofomaha.org

Presentación con discursos informativos y actividades interactivas

Scottish Rite Masonic Center
202 S 20th Street Omaha NE 68102

Foro de octubre de 2017
De 6:30 p.m. a 8:30 p.m.
Estacionamiento disponible al sur del edificio cerca de la 20th Street
Digital Advertising

Digital Ads targeted to internet users were used for stakeholder and community meetings, community forums and survey outreach. Invitations and flyers were posted on the partner websites, the City of Omaha HCD Planning Department website, the City of Omaha Human Rights and Relations website, “The Village” website and local news websites.
Social Media

A facebook page was created dedicated to sharing information and events related to the AFFH. Information was also posted and shared on the Heartland 2050’s Facebook page.
Fair Housing Assessment Meeting:
Transportation

Public · Hosted by Heartland 2050

Interested  Going

Thursday, June 29 at 9:30 AM - 11 AM
about 5 months ago

Omaha-Council Bluffs Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102
Show Map

About  Discussion

Fair Housing Assessment Meeting:
Development Community

Public · Hosted by Heartland 2050

Interested  Going

Friday, June 16 at 12:30 PM - 2:30 PM
about 6 months ago

Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102
Show Map

About  Discussion

Fair Housing Assessment Meeting:
Disability Community

Public · Hosted by Heartland 2050 · 1 co-host pending [?]

Interested  Going

Thursday, June 15 at 12:30 PM - 2:30 PM
about 8 months ago

Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102
Show Map

About  Discussion

Omaha AFFH Meeting:
Non-profit / Community Advocacy

Click to RSVP

The City of Omaha, with the assistance of the Metropolitan Area Planning Agency (MAPA), will be conducting an Affirmatively Furthering Fair Housing AFFH assessment to study the impediments to fair housing choices throughout the community.

The participation of the non-profit/community advocacy community to identify the impediments to housing choices in the city is vital to the development of AFFH.

Please join us on Thursday, June 15, from 9:30 a.m. to 11:30 a.m. in the downstairs meeting room at MAPA to provide your feedback and comments. If you are unable to attend, please send a representative. In preparation for the meeting, please look over the AFFH site linked below. Sharing this invitation with appropriate contacts in your network would be appreciated.

Click to View AFFH Site

Go to Maps & Tables section for instructions to view AFFH maps with data specific to Omaha.
Do you know neighborhoods that discriminate?
Do you have trouble accessing services like transportation, education, food, or healthcare?
Is your housing affordable for you, and does your housing meet the needs of your family?
Do you experience barriers related to disability?
Does anyone in your family feel targeted because they are ‘different’?

Your voice should be heard. The Omaha Housing Authority, together with the City of Omaha and other partners, is conducting an assessment of housing needs in our community. Your experience will help guide our leaders to address discrimination, to build strong neighborhoods, and to ensure equal access to quality affordable housing for everyone in our community.

JOIN US TO LEARN MORE
OHA IS HOSTING A COMMUNITY MEETING
MONDAY, AUGUST 7 at 6:00 pm
MILTON R. ABRAHAMS PUBLIC LIBRARY, 5111 N. 90th ST

OPEN HOUSE COMMUNITY MEETINGS
JULY 24 6:00 – 7:30 pm    MILLARD BRANCH LIBRARY, 13214 Westwood Lane
JULY 27 6:00 – 8:00 pm    UNION FOR CONTEMPORARY ARTS, 223 N. 24th Street
JULY 30 2:00 – 4:00 pm    ST. FRANCIS CABRINI SCHOOL GYM, 1335 S. 10th Street
AUG 7 4:30 – 5:30 pm    MILTON R. ABRAHAMS PUBLIC LIBRARY, 5111 N. 90th Street
AUG 9 6:00 – 8:00 pm    SOUTH OMHA LIBRARY, 2808 Q Street, Meeting Rooms A&B

TAKE THE ONLINE SURVEY
www.surveymonkey.com/affh2017
PAPER COPIES ARE AVAILABLE AT ANY OMHA OFFICE
OR REQUEST A COPY BY EMAIL omah@shakhtar.org
LEARN MORE https://affh.cityofomaha.org/

For ADA accessibility, please contact the City ADA Coordinator (402) 444-5067 48 hours prior to the scheduled meeting.
Part II Community Organizations Consulted

As listed in Part I, many organizations, groups and individuals were contacted in various ways to engage both in meetings, conferences, forums and as facilitators for the distribution of information. The partners used all contacts and in-house mailing/email lists, previous activity sign-in sheets, personal contacts and resource guides to distribute information to the region.

Community organizations consulted during the community engagement process: (not an exhaustive list)

Omaha Public Schools
University of Nebraska Omaha Service Learning Academy
Latino Center of the Midlands
Nebraska Appleseed
University of Nebraska-Omaha
Food Bank of the Heartland
in COMMON Community Development
Omaha Economic Development Corporation
Greater Omaha Chamber of Commerce
Omaha Healthy Kids Alliance
Omaha Housing Authority
Omaha by Design
Empowerment Network
Midlands Mentorship Partnership
Urban Indian Health Coalition
United Way of the Midlands
Heartland Family Services
Eastern Nebraska Community Action Partnership
Voices for Children
Douglas County Health Department
Heartland Workforce Solutions
Lutheran Family Service
Justice for Our Neighbors
Habitat for Humanity
Heartland Workers Center
Sherwood Foundation
Non-Profit Association of the Midlands
Urban League of Nebraska
Big Muddy Urban Farm
ONE Omaha
NeighborWorks Home Solutions
75 North Redevelopment
Black Men United
Omaha Small Business Network
AAA Bank
Family Housing Advisory Services
Fair Housing Center
Restoration Exchange Omaha
Metro Transit Authority
ModeShift Omaha
Omaha Bikes
Omaha Land Bank
Spark
Omaha Together One Community
Eastern Nebraska Office on Aging
Outlook Nebraska
Autism Nebraska
Union for Contemporary Art
Refugee Empowerment Network
Heartland 2050 Equity and Engagement Committee

PART III Evaluation of Community Participation
Program partners engaged in numerous activities to obtain thorough, meaningful participation for the AFH. The meeting attendance was generally positive. The engagement process lasted over 10 months. Beginning with existing committees as part of the Heartland 2050 Vision project and transitioning to the kick off of the Regional Affirmatively Furthering Fair Housing (AFFH) effort. The AFFH Forum held October 24th was meant to close the period of engagement by reflecting back to the public what was heard during the period for public input. A handful of interviews and meetings took place after October 24th in an attempt to address any further questions that had not been previously answered.

The first set of stakeholder meetings were used to engage partner organizations, private industry by type, and community based organizations in providing expertise around their experience of fair housing issues, factors, and strategies. These partners were identified through kick off workshops, engagement in prior assessments, and by consulting other housing advocates and organizations.

Some of the barriers to participation of stakeholders were the planning fatigue, concern over the national political climate, and a lack of belief in the efficacy of the project. Many groups in Omaha have been asked to participate in public participation previously around similar issues and did not feel their feedback led to real change. Locally, there exists some grassroots organizations that have communicated concern over the use of federal funds based on previous participation projects. These concerns were noted and resulted in the commitment of program partners to report key findings and their impact on the AFH process.

The feedback received from the stakeholder meetings, individual meetings, focus group meetings, open house meetings, events in the community and the survey were used to inform the framing of contributing factors/issues that led to recommended strategies and goals to overcome barriers to fair housing.

In addition to using the feedback to guide the creation of strategies, the participation broadened the scope of conversation to include holistic approaches to providing an increase of high quality, affordable housing. The AFH has contributed to an increase in the number of stakeholder and community discussions on issues of segregation, lack of access to opportunity, and other disparities across protected classes.

**Based on stakeholder feedback, the most prevalent fair housing issues in the region include:**

- Lack of affordable housing units equally distributed throughout the region
- Concentration of racial and ethnic minorities in low income communities
- High quality schools are not equally distributed throughout the region
- Lack of affordable housing located near public transportation
- Lack of accessible housing for people with disabilities
- Issues related to discrimination/institutional racism

Comments consistently heard throughout the meetings were:
- “If done correctly, transportation can connect housing, jobs, schools, and social services to give people more choice in where they live”
- “We need to encourage affordable infill development in East Omaha”
- “there are not enough affordable and accessible apartments for the disabled population”
- “A mix of housing size and affordability within a neighborhood means diverse people for the neighborhood”
- “We need to make places that need to be fixed up affordable and accessible”
- “education is key. We need to drastically increase our expectations for kids and families.”

PART IV Summary of Comments and Participation

Results from Public Feedback
The public participation process allowed for fruitful conversations to occur at the stakeholder meetings and public open houses. While many of the issues discussed are not new to the area, many still struggle to find solutions. Feedback received from conversations, surveys and worksheets are incorporated in the body of the assessment. All comments from public meetings were also published on the AFFH website. In addition, meeting summaries can be found in Attachment A.

**Figure III-3 Word Graph of Comments from Public Engagement**

![Word Graph of Comments from Public Engagement](image)

**Source:** Community and stakeholder meeting summaries

**Additional Comments from Open House events:**

In the last 5 years, have you experienced discrimination when trying to buy or rent housing?
• Being a single parent
• Bank employee was extremely slow and asked for more job history than was necessary
• The bank actually told me that if I could show some kind of distress I would qualify for assistance. So they were telling me to miss payments on purpose instead of struggling to make ends meet to get assistance. This is not acceptable.
• Only have been shown certain areas of town. I had to do my own research and demand to be shown houses in other areas
• Before being married as I am now, my felony record, I would fail background checks and be denied. Even though in my profession I made 60-65k/year and haven't had a charge since I was a teen (over 15 years.)
• Pregnancy

If you have applied for or taken out a loan for housing from someone other than a bank, why did you pick that option? What was your experience?

• Refinance at a Credit Union. They are not responding I feel like they are trying to make me keep the current rate of interest I am paying.
• Medical expenses I couldn't afford. It was difficult to get out of the cycle of getting a loan, paying it the next week, and getting another for living money.
• Needed the cash for a deposit, chose the easiest short term solution. Not a pleasant experience & very expensive in the long run.
• I felt dehumanized because payday loan companies OBVIOUSLY rip you off, but I had no choice.
• I tried credit unions and banks; some I was met with professionalism, others I was just given the niceties with the raised eyebrows and the pursed lips with the "we'll let you know" line.
• I couldn’t get the loan I needed because I'm self-employed. This creates a less comfortable family situation and is a bit difficult to afford, but we did it for the school district.
• Because my parents have no assets- I put myself into mega debt to get my degree because I knew it would be my ticket up and out.

The community outreach conducted for the Assessment of Fair Housing/Analysis of Impediments provided information that was used to create and prioritize contributing factors to fair housing listed throughout this document. These factors are also the foundation for the goals included in the Executive Summary and Section IV of this assessment.
The community engagement process revealed gaps in communication between government entities and different groups, included protected classes within our communities. In part as a response to the challenges found in outreach efforts for the AFH, a group of City and County staff are working to update community engagement processes for multiple governmental departments.

COUNCIL BLUFFS

Part I Outreach Activities and Methods of Engagement

In conjunction with the Municipal Housing Agency, the City of Council Bluffs held a variety of public meetings and one-on-one sessions to educate residents about AFFH and gain feedback. Attachment B is the meeting schedule for Council Bluffs. In order to reach the largest number of individuals, the City and MHA employed several tactics:

i. Emails were distributed to a list of over 170 individuals and covered partnering agencies, government officials and other local stakeholders;
ii. Social media blasts were provided through the City’s Facebook and Twitter pages as well as on the City’s and MHA’s respective websites;
iii. Press releases were run in the Daily Nonpareil for each event to reach those without internet access;
iv. Posters and fliers were displayed/handed out at MHA as well as in the Community Development Department offices; and
v. The City partnered with Centro Latino to assist with reaching individuals with limited English proficiency.

The Municipal Housing Agency met with their Resident Advisory Board (RAB) on May 17, 2017 for their Annual Resident Advisory Board Meeting. During this meeting information regarding the AFFH process, and how the individuals from the Resident Advisory Board can provide input and feedback in the process was discussed. The individuals of the RAB provided fair housing issues they experience. The RAB expressed concerns over disproportionate housing needs, such as inadequate affordable housing stock (i.e. not having adequate basic amenities, not having large enough units, cost of housing), housing in specific areas is too costly and does not fall within the payment standards that a Section 8 participant must follow.

The Municipal Housing Agency had two different meetings with the Resident Advisory Board and a few other individuals from different agencies throughout Council Bluffs, as well as the Board of Commissioners for Municipal Housing Agency on June 28, 2017.
Information regarding the AFFH process and feedback was provided.

Part II Community Organizations Consulted

The City of Council Bluffs and Municipal Housing Agency consulted with different organizations and will continue to communicate during the community participation process. The organizations that have been consulted are as follows:

Council Bluffs Chamber of Commerce
Hearing/Deaf Council Bluffs Silent Club
Centro Latino
Council Bluffs Rotary Club
Council Bluffs Landlord Association
Justice for our Neighbors
Seldin
NP Dodge
J Development
Council Bluffs Neighborhood Associations
Iowa West Foundation
Legal Aid
City of Council Bluffs Building Division
City of Council Bluffs Planning Commission
Council Bluffs City Council
Pottawattamie County Offices
Council Bluffs Civil Rights Commission
Council Bluffs Health Department
Community Development Advisory Committee
Pottawattamie County Department of Human Services
Council Bluffs Housing Trust Fund
Pottawattamie County Department of Veteran Affairs
Municipal Housing Agency Resident Advisory Board
Municipal Housing Agency Board of Commissioners
Municipal Homes Inc. Board of Directors
Micah House
Heartland Family Services
Family Housing Advisory Services
American Red Cross
Southwest Iowa Board of Realtors
New Visions Homeless Services
Salvation Army
NeighborWorks Home Solutions
League of Human Dignity
Boys & Girls Club
Connections Area Agency on Aging
Metro Area Continuum of Care for the Homeless
Human Service Advisory Council (HSAC)
Catholic Charities
Inter-Faith Response

Part III Evaluation of Community Participation

Meeting turnout varied by stakeholder group. Staff encouraged stakeholders and the public to attend any meetings that met their availability to encourage participation. The landlord and human services stakeholder groups were very active in attending meetings and giving feedback. These groups tend to me more active in Council Bluffs with a strong landlord association and the Human Services Advisory Council (HSAC). The government stakeholders were less active in the process due to a lack of involvement with housing type activities. Public meetings had average turnout with approximately 20-30 attendees commenting at each meeting level. This is average for public participation in Council Bluffs.

Part IV Summary of Comments and Participation

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

The most prevalent comments for Council Bluffs were a need for additional affordable housing in a range of sizes, affordable, accessible housing in a range of sizes, and increased public transit opportunities for residents. The other main comment recognized a need for additional public transit services for all residents.

Other comments were:
- Not enough housing
- There are a limited number of places that accept housing vouchers
- Services for low income/poverty are not realistic or are too difficult to utilize
- Crime in Council Bluffs is high
- Service(s) and assistance is not readily available or not realistic
- Condition of rental units is bad
- The City needs to stop forcing landlords to register their properties
- Council Bluffs has horrible areas for crime and drugs in low income areas
Public comments and summaries from meetings and open house events in Council Bluffs can be found in Attachment F.

BELLEVUE

Part I Outreach Activities and Methods of Engagement

In order to encourage and broaden community participation in the AFFH plan, the City of Bellevue utilized different avenues of outreach activities including expanded distribution of information about the AFFH process including hosting community meetings, distributing a community survey, and holding meeting and phone conferences with individual stakeholders.

The City of Bellevue utilized media outreach as an important avenue to publicizing community meetings. Direct mail and email invitations were sent to members of the CDBG distribution list and community stakeholders, including local service providers, previous applicants and community residents. Legal ads regarding the public hearings were also placed in the Bellevue Leader. The City of Bellevue utilized their website and Facebook page to publicize public hearings and community meetings and reach residents who may not be familiar with the CDBG program.

To provide information regarding the AFFH process, the City of Bellevue utilized the City of Omaha’s website for the regional AFFH plan and included the address in all publications. The information was posted on the City’s website, social media pages, and distributed at meetings. Also included with the notices was information and directions to obtain publications in additional formats. A variety of organizations working with LEP and persons with disabilities were invited to participate in the AFH events and invitations included information for those who needed assistance or accommodations to participation.

The City hosted three public meetings to obtain information from residents and public officials. Notices were published on the City’s website, social media page, and to the CDBG mailing list. The meetings were held on: May 3, 2017; September 15, 2017; and December 14, 2017. These meetings were held in various locations throughout Bellevue to offer several opportunities for the public to attend including the Bellevue Public Safety Building, Bellevue Fire Training Center, and Bellevue University.

To expand outreach efforts, the City also held targeted individual stakeholder meetings to gather insight about specific aspects of community assessment that were lacking
information this included City’s CDBG staff meeting with Bellevue Public Schools and the Bellevue Chamber of Commerce, as well as city staff members.

Bellevue also participated in the regional fair housing survey. The survey was developed and distributed to the CDBG distribution list as well as advertised on the City’s website and Facebook page. In addition, the City provided the survey to all city employees and Sarpy County employees. A memo and survey link were included in emails to providers to make sharing the information with their distribution list easier. Of the survey responses, 142 came from Bellevue associated zip codes with the majority reporting the survey provided by a City of Bellevue employee or website.

Bellevue Housing Authority

Bellevue Housing Authority (BHA) recognizes that significant community involvement in the AFFH process is necessary to make the AFFH identification of issues, goal setting, and strategy development as successful as possible. The agency has worked to reach out to the residents of the Housing Authority, its Housing Choice Voucher participants, waiting list applicants, community members, agency partners, current landlords, potential developers, and the community at large. The agency began in March by gathering commitments from its own board and advisory teams. AFFH topics and ongoing goal setting processes were discussed at each meeting of the BHA board and at all community meetings in which it has participated in the period leading up to the AFFH submission.

Identification of issues was gathered in conjunction with the metro area partners and through individual conversations related to the survey. Surveys were dispersed, advertised, and collected in the Bellevue locations (Bellevue Public Library, Bellevue Senior Center, One World Health, the BHA office, and other public places.) Outreach via email to established list of the Housing Authority was sent in July. The BHA list at that time had 775 contacts. According to the reporting software, about 31% opened the email and 63 clicked through to the survey. On July 18, 2017 BHA had a booth at a local sports venue and distributed over 500 cards with the survey information.

The agency distributed survey information to 175 BHA households as part of its Back to School distribution the week of July 18. After providing a 45 day notice, BHA held a public meeting for residents on 10/16. Five residents participated. This is consistent with the average turnout for BHA’s public housing programs. Historically, it has been very difficult to get residents to attend meetings of this type. As such, in order to expand this involvement, continual conversations about what is impacting our residents with regards to AFFH issues is where BHA’s focus has been. As part of annual interviews
AFFH questions were asked and information was obtained. Special focus was given to our African and Middle Eastern immigrant households as those families have historically had our highest issues of AFFH issues. Bellevue Housing Authority believes that as documented above, its program participants and waiting list applicants had reasonable opportunities for involvement.

**Part II Community Organizations Consulted**

City of Bellevue – Administration, Finance, Fire, Human Services, Permits and Inspections, Planning, Police, Public Works Departments
Bellevue City Council
Bellevue CDBG Committee
HUD, Omaha, Field Office
HUD, Kansas City, Office of Fair Housing & Equal Opportunity
Offutt Air Force Base
Bellevue Chamber of Commerce
Metropolitan Area Planning Agency
Sarpy County Economic Development Corporation
Sarpy County Public Administration
Sarpy County Board of Commissioners
Sarpy County Chamber of Commerce
Eastern Nebraska Office on Aging
Bellevue Senior Center
Habitat for Humanity of Sarpy County
Metropolitan Area Continuum of Care for the Homeless
Bellevue Food Pantry
Eastern Nebraska Community Action Partnership
Sheltering Tree, Inc.
Bellevue Public Schools
Rebuilding Together Omaha
Green Bellevue
Sarpy County Museum
United Way of the Midlands
Bellevue Housing Authority Foundation
Sarpy County Court Appointed Special Advocates
Bellevue Leader
Bellevue Junior Sports Association
Bellevue Public Safety Foundation
Better Business Bureau
Fraternal Order of Eagles
Rising View Housing
Eastern Nebraska Veteran’s Home
Nebraska Hispanic Chamber of Commerce
Lift Up Sarpy County
Catholic Charities
Goodwill Industries
Heartland America Chapter Military Officers Association
Kiwanis Club of Bellevue
Knights of Columbus Council
Lutheran Family Services
Midlands Community Foundation
Omaha SCORE Chapter
Tobacco Free Sarpy
Sarpy County Health Department
Nebraska Medicine
Bellevue University
Papillion La Vista Community Schools
Omaha Public Schools
Metropolitan Community College
Sarpy County Cooperative Head Start

**Part III Evaluation of Community Participation**

Following low community input at the first public meeting with elected officials, the City of Bellevue expanded outreach efforts through direct mailing invitation and information as well as increased posting to social media sites in order to elicit additional community involvement. The following two community meetings provided important and insightful discussion with community members and service providers which assisted in identifying fair housing issues and contributing factors. The responses to personal invitations to the meetings were positive and assisted with increasing participation. For areas needing additional information, the City of Bellevue and Bellevue Housing Authority conducted phone interviews and targeted individual stakeholder meetings which provided valuable information to assist with the shaping of the fair housing analysis.
Part IV Summary of Comments and Participation

Comments obtained through community input was focused on the categories of transportation and affordable housing. Comments included:

Affordable Housing:
- Residents are choosing to remain in Bellevue, but the housing for growing families is not currently available which limits the amount of available affordable housing for new residents.
- The market of three and four bedroom plus housing is very small and larger families are moving outside of Bellevue in order to find housing.
- Lack of housing available for the disabled community.
- Community opposition to additional development of affordable housing.
- Tax laws prohibitive to public/affordable housing, higher tax base makes affordable housing development more difficult

Transportation:
- Citizens who wish to live in Bellevue are aware of the limited availability of public transportation.
- Lack of housing near public transportation.

Other:
- Community assets include the public safety provide by police and fire as well as the public school system.
- Funding available to address issues identified is very limited and additional funding sources will have to be identified.
- Lack of employment opportunities and job centers within in Bellevue, also due to criminal background and transportation limits.
- Lack of supportive services for families with new employment.
- Social services are limited and there is confusion regarding city and county limits and borders which limits areas of service availability.

Bellevue Housing Authority

Most frequent comments received from program participants:
- Landlords that aren’t tax credit landlords don’t take Housing Choice Vouchers.
- It is hard to find larger homes in an affordable range.
- Existing affordable multi-family housing is aging and becoming run down.
- Lack of supportive services for families.
• Homeless and transitional services don’t cross county lines.
• Lack of Transportation services.

Most frequent comments from community members:
• Perception of lack of need for services and housing for marginalized persons.
• Zoning isn’t conducive to building in higher opportunity areas.
• Property taxes are high and not favorable to unsubsidized affordable construction.
• Supportive services aren’t needed because there aren’t community members that need them.

SECTION IV.

Assessment of Past Goals, Actions and Strategies
SECTION IV.
Assessment of Past Goals, Actions, and Strategies
SECTION IV  Assessment of Past Goals, Actions, and Strategies

Key Terms:
LMI: low and moderate income
NEOC: Nebraska Equal Opportunity Commission
OHRRD: City of Omaha Human Rights and Relations Department
HUD: Housing and Urban Development
CDBG: Community Block Grant Funds
TIF: Tax Increment Financing
ADA: Americans with Disabilities Act
HOME: HOME Investment Partnerships Program
LIHTC: Low Income Housing Tax Credits
AI: Analysis of Impediments
1. Indicate what fair housing goals were selected by program participant(s) in recent Analysis of Impediments, Assessments of Fair Housing, or other relevant planning documents.

Goals articulated in the most recent Analysis of Impediments in 2010 included:

1. Support a community-wide program to help reduce public opposition to group living facilities, public-assisted housing, and other locally unwanted land use through education and outreach.
2. Support an integrated approach to fair housing enforcement that includes fair housing education, to inform and encourage the public to recognize and report housing discrimination, and collaboration of all fair housing enforcement agencies.
3. Increase the amount of affordable and accessible housing stock in the community and ensure that persons with physical or mental disabilities fully and equally enjoy housing opportunities.
4. Conduct a more extensive study of the homeowner insurance market to determine the scope of identified problems & identify potential systemic approaches to eliminate insurance barriers to fair housing choice.
5. Promote the access to and utilization of legitimate, non-predatory, and affordable credit services through public education, policy review and advocacy, and the development of alternative financial services readily available to all sectors of the community.
6. Increase the availability and supply of safe and affordable rental housing stock in Omaha for low and moderate income individuals and families.
7. The City of Omaha and the City of Council Bluffs create incentives that would increase the supply of fully accessible housing for rent and for sale as well as units with supportive services readily available.
8. Lending institutions in the Consortium area be encouraged to market more aggressively to minority markets as part of their fulfillment of their CRA responsibilities and a good business practice.
9. The City studies the pros and cons of instituting a registration process for all rental units, including routine inspections to ensure the housing stock is maintained at the minimum dwelling standards.
10. The Mayor’s Fair Housing Advisory Group be provided with adequate resources to help them carry out their mission to ensure the City is affirmatively furthering fair housing.
11. The City develop or sponsor a program of fair housing education, such as a conference or similar event, to provide community education on fair housing issues designed for the general public and for housing providers.
2. Discuss what progress has been made toward the achievement of fair housing goals in Program Years (2010 – 2017).

Goal 1: Support a community-wide program to help reduce public opposition to group living facilities, public-assisted housing, and other locally unwanted land use through education and outreach.

Educational materials were created for use by the City, real estate developers, community-based organizations, and local fair housing groups to educate residents and address concerns regarding the inclusion of publicly supported/assisted housing. The materials are aimed at helping the greater community understand the potential benefits of providing housing for LMI families.

The Fair Housing Center has continued to conduct presentations to neighborhood groups, schools, panel discussions, conferences, and workshops. The Fair Housing Center works collaboratively with HUD, the NEOC, and OHRRD, OHA, and property management companies to provide education, training, and other outreach services in the greater Omaha area. In addition to education and outreach activities, the Fair Housing Center works to end housing discrimination through comprehensive testing program, investigation of complaints, advocacy, and mediation services.

The City of Omaha Human Rights and Relations Department produces brochures, videos, and other educational materials in multiple languages on Fair Housing rights and laws. In addition they consult with other City departments and community organizations on fair housing related outreach and compliance. This department has a presence at many conferences, at workshops, and panel discussions. OHRRR sponsors many events annually including a Martin Luther King Celebration, Multicultural Brown Bag Lunch Series, and Table Talk discussions with Inclusive Communities Inc. Staff serve on numerous boards and committees such as the Heartland 2050 Housing Committee, Refugee Task Force, Mayor’s Commission for Citizens With Disabilities, Southern Sudan Refugee Resettlement Board, and the Mayor’s Fair Housing Advisory Board.

The Omaha office of the Nebraska Equal Opportunity Commission (NEOC) provides fair housing education in the Omaha area, including mandatory fair housing training for respondents in fair housing cases. The commission meets monthly to hear public comment and rule on cases related to discrimination and public accommodations.
Subtask: Develop a formal process that encourages and supports the use of alternative dispute resolution to help housing providers and neighborhoods reconcile differences over group home issues, public-assisted housing and similar locally unwanted land use.

Although a specific network has not been developed, there are existing resources that are being used to provide the services needed. The Planning Board of the City of Omaha meets with residents and interested parties of an action. Council persons hold town hall meetings where residents voice concerns. City staff attend neighborhood meetings in an effort to further the discussion regarding fair housing rights, community perceptions, and anticipated future projects.

Agencies, neighborhood leaders, and others are encouraged to contact Concord Mediation Center for formal conflict resolution. Concord Mediation Center creates pathways for constructive dialogue and conflict resolution. The Center provides mediation, facilitation and education through specialized alternative and innovative methods to manage personal or professional conflicts.

Subtask: Continue to increase the stock of affordable housing that is available to meet the needs of the population of persons with disabilities and the homeless.

The City of Omaha provides, through HUD funding, Emergency Solutions Grants (ESG) to assist the homeless population. ESG funds are passed through to various local organizations that provide assistance and prevention services to homeless and vulnerable populations. Eligible activities for the ESG program include street outreach and emergency shelter services and short and medium-term rental assistance and housing relocation and stabilization services.

Supportive Housing Program (SHIP) funds are competitive HUD funds applied for directly by area nonprofit organizations. SHIP funds support activities directed at ending and reducing homelessness. They fund the development and support of Continuum of Care housing Initiatives- permanent housing, permanent supportive housing, transitional housing. The City also receives and administers Shelter Plus Care (S+C) funds that provides rental assistance for chronically homeless individuals with severe mental illness. Chronically homeless individuals and families are identified through the efforts of several outreach and service agencies (Community Alliance, Charles Drew Health Center, Heartland Family Service, the Nebraska Aids project, Sienna Francis House, Stephen Center, Visiting Nurses Association, Veterans Affairs, and Youth Emergency Services). Once identified, they are assessed by those same agencies and referred to what is currently the most appropriate of available housing options. After housing is
established, case managers work with the individuals and or families to stabilize their situation and connect them to needed services.

The City is the jurisdiction’s grantee for rental assistance for the chronically homeless with mental illness, a 22-bed program, run in partnership with OHA and Community Alliance. Other housing programs serving the chronically homeless are Heartland Family Service’s Samaritan Program, the Veterans Administration Supportive Housing (VASH) program; and the Sienna Apartments PSH Project and new Visions PSH. Emergency shelters and other programs, including transitional housing facilities, also provide and/or work to secure housing for the chronically homeless in route to ending their homelessness. The City of Omaha also provides HOME funds for tenant based rental assistance through OHA to assist near homeless households.

**Subtask:** Provide education to local elected officials, real estate developers, landlords, property managers, and neighborhood associations on NIMBYism, siting issues, and applicable fair housing laws.

The Mayor’s Fair Housing Advisory Board, established in 1993 is one vehicle used by the City to address the barriers identified in the AI. The Advisory Board has addressed the need for public education through a public marketing campaign. Fair housing related articles and public service announcements have been published in several print and broadcast media outlets including: Cox Cable, Journal Broadcasting radio stations, apartment guides and magazines, The Omaha Star and El Perico. Members also appeared on a KVNO radio show to discuss fair housing issues. The Advisory Board initiated a partnership with the Omaha Public Schools (OPS) in 2010 to integrate fair housing concepts and issues into current curriculum. Further discussions with OPS have taken place in subsequent years to initiate Fair Housing training for teachers.

The Advisory Board has sponsored a Fair Housing conference, “Realities in Housing” for the past 3 years. This conference has focused on fair housing issues in real estate, lending, landlords and the Affirmatively Furthering Fair Housing analysis that the City has conducted. The board continually is involved in additional training opportunities and pursues various ways to produce information for distribution to the public on fair housing issues.
The Omaha Human Rights and Relations Department continues to provide learning opportunities in diversity, inclusion and fair housing rights. Brochures, flyers, DVD’s are produced in multiple languages and distributed at all events attended such as the Word Refugee Day, Earth Day, all local conferences, job fairs, and trainings. Sponsored events also offer opportunities such as the Martin Luther King event held annually, Cinco De Mayo celebration, International Women’s Day celebrations, activities held during Fair Housing month (April), and Omaha’s Diversity Week events. Staff provides training on Small Emerging Business process, ADA compliance, fair housing issues, landlord/tenant law regarding fair housing issues. OHRRD completed the Limited English Proficiency (LEP) Plan for the City of Omaha in 2015.

**Goal 2:** Support an integrated approach to fair housing enforcement that includes fair housing education, to inform and encourage the public to recognize and report housing discrimination, and collaboration of all fair housing enforcement agencies.

There are four governmental bodies and one private, nonprofit agency providing fair housing services in the City of Omaha or in Council Bluffs:

1. U.S. Department of Housing and Urban Development, Fair Housing and Equal Opportunity Offices (HUD)
2. Nebraska Equal Opportunity Commission (NEOC)
3. City of Omaha’s Human Rights and Relations Department (OHRRD)
4. Fair Housing Center of Nebraska – Iowa (FHC)
5. City of Council Bluffs Civil Rights Commission

OHRRD, NEOC and HUD have the capacity to conduct investigations of fair housing complaints in Omaha and to conciliate or settle those complaints. These agencies act as impartial investigators and they have the power to subpoena records and require witness testimony. Council Bluffs’ Commission does not file claims with nor does it receive cases from HUD. The Fair Housing Center works to end housing discrimination through testing, investigation, advocacy, mediation services, and additional education and outreach activities. It is a full-service Center providing investigation, broad based testing, and mediation services for all persons protected by Federal, State and local Fair Housing laws. The Center is the only nonprofit agency designated as a Qualified Fair Housing Enforcement organization by HUD in the states of Nebraska and Iowa. The NEOC has created a learning curriculum for all school ages on Fair Housing issues and
activities. The Fair Housing Board and the City Planning Department will collaborate to champion the use of this program through the various school system.

**Goal 3:** Increase the amount of affordable and accessible housing stock in the community and ensure that persons with physical or mental disabilities fully and equally enjoy housing opportunities.

**Subtask:** Educate developers, non-profit organizations and architects about ways they can enhance the accessibility of existing units and increase the availability of accessible units.

The City of Omaha complies with Section 504 of the Rehabilitation Act and partners with the League of Human Dignity to create/modify housing to serve persons with disabilities. The City of Omaha uses at least a minimum of 25% “visitability” standard in HUD funded new construction homes. Visitability refers to single-family housing that is designed to be visited by people who have mobility issues or impairments. The City’s nonprofit developers are increasing construction of accessible and/or visitable new homes.

Recently a bill, LB496 allows the use of TIF to finance workforce housing in areas with high unemployment and poverty rates within cities. It defines workforce housing as owner-occupied housing units that cost no more than $275,000 to build, or rental housing units that cost no more than $200,000 to build. Other requirements have to be met, however, this provides an opportunity to utilize a source of funding that has not been used in Omaha.

**Subtask:** Amend existing zoning and land use regulations to enhance access to affordable housing by persons with physical or mental disabilities (removing spacing requirements, define Group Home and Family in charter)

City ordinances were modified to eliminate spacing requirements between group home facilities. No other changes have taken place in this area.

**Goal 4:** Conduct a more extensive study of the homeowner insurance market to determine the scope of identified problems & identify potential systemic approaches to eliminate insurance barriers to fair housing choice.

**Subtask:** Conduct preliminary focus groups with insurance and real estate industry and consumer representative, non-profit developers, and community organizations to identify the nature and scope of issues to be addressed.
The Fair Housing Advisory Board has sponsored four “Realities in Housing” conferences with focus on affirmatively furthering fair housing and the contributing factors of discrimination and segregation as it relates to the real estate, lender, insurance, and property owner/manager industries. These conferences targeted specific audiences use panels, individual focus group discussions, certified trainings provided by consultants, and table discussions based on worksheets and survey results. Additional goals were set to specifically address “blockbusting”, “steering” and “redlining” issues within housing-related industries.

Multiple task groups were formed, strategies developed, and goals set as a result of the Heartland 2050 Fair Housing Equity Assessment completed in 2015. Addition planning efforts include the South Omaha Community Assessment Report, the Community Foundation, “Landscape Project”, Empowerment Network Village Plan.

**Goal 5:** *Promote the access to and utilization of legitimate, non-predatory, and affordable credit services through public education, policy review and advocacy, and the development of alternative financial services readily available to all sectors of the community.*

Subtask: *Promote the development of alternative legitimate services, non-profit or otherwise, to address identified gaps in financial industry practices, which are currently being filled by predatory practices in: check cashing and payday loan” services*

The Fair Housing Center produces training materials and makes presentations to neighborhood groups. The City’s Human Rights and Relations Department produces, posters, brochures, DVD’s, psa’s and distributes HUD materials on Fair Housing and predatory practices.

Omaha 100, Inc. represents a consortium of lending institutions pooling funds to provide mortgage financing to homebuyers and cash subsidies to nonprofit developers. Omaha 100, Inc. helps participating institutions fulfill the needs of the community (quality and affordable housing) while increasing their Community Reinvestment Act activity. The main goal of Omaha 100 is to assist renters in becoming homeowners. Its mission is to provide mortgage loans to low and moderate-income borrowers in order for them to purchase homes at an affordable cost.

The City of Omaha utilizes HOME, CDBG, and Nebraska Affordable Housing Trust Funds to provide down payment assistance for the purchase of newly constructed and/or newly rehabilitated homes. Down payment assistance is provided to purchasers
of homes constructed by the nonprofit developers or the City. This assistance is available through Omaha 100, Inc. who also provide the first mortgages.

The City of Omaha allocates HOME funds to the City of Council Bluffs to facilitate single family housing and multifamily development. The City of Council Bluffs provides down payment assistance through a non-profit to assist low and moderate income homebuyers. The City of Omaha provides CDBG funding to micro-enterprise programs through Catholic Charities and Midland Latino Community Development Corporation.

Loans funded through the City require the owner to gain consent from the City to use equity to secure additional debt. Requests are reviewed to determine the financial stability of the applicant before approval is given for a subordination of debt.

**Goal 6: Increase the availability and supply of safe and affordable rental housing stock in Omaha for low and moderate income individuals and families.**

A recently approved bill, LB496, allows the use of TIF to finance workforce housing in areas with high unemployment and poverty rates within cities. It defines workforce housing as owner-occupied housing units that cost no more than $275,000 to build or rental housing units that cost no more than $200,000 to build. Other requirements have to be met, however, this provides an opportunity to utilize a source of funding that has not been used in Omaha.

Another incentive to encourage the development of affordable housing is in Section 55-785 of Chapter 55 or the Municipal Code in Omaha. The language states that for a development in which residential units are intended for individual sale to owner-occupants, an applicant may reduce the required site area per residential unit by up to 20 percent if they certify that the selling price of a specified percentage of the available units will be no more than 2.25 time the current median income of a family of four established by the HUD. For a development in which residential units are intended for rental or for cooperative ownership by tenants, an applicant may reduce the required site area per residential unit by up to 20 percent if they certifies that the monthly rental of a specified percentage of the available units will be no greater than Section 8 Fair Market Rents or any comparable official standard established by HUD for a corresponding size for a period of no less than 5 years. Although these provision exists, they have not been used in development.
The Omaha Municipal Land Bank acquires vacant, abandoned or dilapidated properties throughout Omaha and either renovates or demolishes the property for future use and growth. The Land Bank works with nonprofit agencies, neighborhoods, and the City.

The City Planning Department provides funding for rehabilitation programs that include owner occupied rehab/ and or tenant – Emergency Program, Energy Conservation/Healthy Homes Program, Handyman Program, Full Rehabilitation Program, and Exterior Repair Program.

City Planning also collaborates with other organizations in an effort to provide and assure decent, safe and sanitary housing for low to moderate income persons:

- Rebuilding Together to assist with a roofing program
- Habitat for Humanity in Omaha for a demolition program
- League of Human Dignity for barrier removal
- Lead Hazard Control Program
- EPA soil removal and remediation program

The City of Omaha and Council Bluffs have collaborated with nonprofit and for-profit developers to use HUD and state funds to develop multifamily rentals, senior housing, and housing for the mentally or developmentally disabled, and long term single family rental housing. Nonprofit and for-profit developers use LIHTC, TIF funding, private donations, capital fundraising, private loans, and other funding sources to provide for low and moderate income households.

The City of Omaha uses HUD funding for an investor owned rental rehabilitation program for vacant properties east of 72\textsuperscript{nd} Street. This program is for full rehabilitation, removal of lead hazards, and addressing radon. A funding match is required from the investor to the program and an income eligible tenant (low and moderate income) is required for a period of time. Mobility counseling is provided by Family Housing Advisory Services and Omaha Housing Authority.

**Subtask:** Recruit non-profit, faith-based, grassroots and other existing community organizations in this effort to ensure efficiency and effectiveness.

City partners with and provides funding to non-profit organizations to develop affordable housing units and market them to LMI persons. The City has also participated as a developer of new construction housing and purchase/rehab/resale of multiple homes to provide housing choice for LMI households.
Habitat For Humanity, GESU Housing, Inc. and Holy Name Housing construct new homes for homeownership and or long term rental. These non-profits use multiple sources of funding to include HUD funds, private foundation funding, capital fund campaigns, in-kind donations, and private loans to construct accessible or visitable, energy efficient, three (3+) bedroom homes

Using Low Income Housing Tax Credits, HUD funds, private loans, foundation grants and other sources, multi-family units are constructed or rehabilitated by non-profit and private developers that provide units for low to moderate income households, housing for persons with disabilities and senior housing. Example of recent developments are; Lofts at 24th Street, St Ann Apartments, Sheltering Tree Housing, Cypress Point, Shannon Heights, Victory Apartments, and the Sawyer Building Apartments and Landon Court Apartments in Council Bluffs.

The Omaha Housing Authority continues to create homeownership opportunities for public housing residents through the sale of single-family housing on scattered sites and the Section 8 program. OHA provides financial planning and homeownership skills training and assistance to residents in securing first and second mortgages for the purchase of OHA homes.

Subtask: Assist in the recruitment of landlords, developers and others to increase deconcentration by increasing those housing providers willing to participate in the Section 8 Housing Choice Voucher program of OHA

- The city continues to recruit new investor owners to participate in its Rental Rehabilitation program to provide affordable rental units for LMI tenants.
- The city provides OHA tenant-based rental assistance for near homeless families
- The Omaha Housing Authority (OHA) Homeownership Program is designed to provide a comprehensive program to empower residents to make informed choices and decisions throughout the home-buying process, followed by long-term homeownership.

Subtask: Continue to support the cooperative efforts of the City Planning department’s code inspectors, the County Health Department, and other agencies to provide a rapid response to correct code and health violations and thus increase the supply of safe, affordable rental housing.

The City of Omaha reviewed their processes of code response and the permit process. Revisions were made to bring the division into alignment to create better efficiency, consistency, and accountability. The data system being used allows for better
communication between the inspectors both in the code department and the building, electrical, plumbing inspectors. Licensing requirements were expanded to all contractors working in Omaha must be licensed and registered.

The following codes have been amended or updated:

2006 IBC - International Building Code
2006 IRC - International Residential Code
2006 IMC - International Mechanical Code
2015 OPC - Omaha Plumbing Code

**Goal 7:** The City of Omaha and the City of Council Bluffs create incentives that would increase the supply of fully accessible housing for rent and for sale as well as units with supportive services readily available.

**Subtask:** Minimum requirements of Section 504 of the Rehabilitation Act be reviewed with the City Planning Department, NIFA, IFA, and Midwest Housing equity with the goal of increasing the local standards to more accurately reflect local need. The City should also consider changes to its building codes to require universal design or adaptable features in all future multi-unit construction.

The minimum requirement is still being met.

**Goal 8:** Lending institutions in the Consortium area be encouraged to market more aggressively to minority markets as part of their fulfillment of their CRA responsibilities and a good business practice.

**Subtask:** Omaha and Council Bluffs continue to support bilingual (Spanish), high quality homeownership classes that include education on fair lending practices for the consumers and that offer individual counseling and credit repair at no or minimal cost.

The city contracts with Family Housing Advisory Services (FHAS) to provide its clients with required homebuyer education. These classes are available in English, however, if translation is needed, interpreters are facilitated in the language needed, often with smaller sessions. Homebuyer preparation is also provided by Holy Name Housing and Habitat for Humanity for their prospective buyers.

**Goal 9:** The City studies the pros and cons of instituting a registration process for all rental units, including routine inspections to ensure the housing stock is maintained at the minimum dwelling standards.
A rental registry system for rental units was developed based upon the registry in LaVista, however, it was not accepted in Omaha. A Vacant and Abandoned Property Ordinance is in effect to provide for the establishment of a registration system, including fees and fines, and institute guidelines for the maintenance and security of abandoned, neglected and vacant properties.

**Goal 10**: The Mayor’s Fair Housing Advisory Group be provided with adequate resources to help them carry out their mission to ensure the City is affirmatively furthering fair housing.

The Fair Housing Advisory Board has been afforded a budget to conduct conferences, educational materials and outreach. Funding in the past years has supported the Board in completing several projects:

- Public service announcements regarding Fair Housing and contact information were shown in the 20 Grand Theater repeatedly for 1 month.
- PSA aired on Channel 7 throughout the month of April in celebration of Fair Housing Month.
- Four billboards (2 in English and 2 in Spanish) were posted for 3 months; located at 30\(^{th}\) & Bedford, 24\(^{th}\) & Martha, 24\(^{th}\) & Q, and 38\(^{th}\) & Ames.
- Three annual “Realities in Housing” conferences held with focus on the real estate, lender, landlord, property management target groups
- Door hangers with Fair Housing information were distributed by volunteers
- Co-sponsoring several fair housing conferences that were conducted by other groups.

**Goal 11**: The City develop or sponsor a program of fair housing education, such as a conference or similar event, to provide community education on fair housing issues designed for the general public and for housing providers.

The City participates in the Lincoln Civil Rights conference annually and in several community events such the NIFA conference, fair housing events throughout the city as well as conducting various housing conferences such as; “Realities in Housing”, Table Talk with Inclusive Communities, Inc., and participating in various monthly meetings (Empowerment Network, Omaha 360, Heartland 2050 committees, Refugee Task Force). Brochures, posters and fact sheets are available at all events attended, resource information is provided and expert consultants provided when requested.

The Mayor’s Office hosted three Economic Inclusion meetings to facilitate the training and inclusion of minorities and women owned businesses into the larger construction opportunities throughout the city. The Small and Emerging Business Program, although
not protected class driven, does assist small businesses that may be minority or woman owned with opportunities to participate in larger projects. The Minority Business Enterprise requirement that the City Planning Department monitors, attempts to hold contractors accountable to seek out and hire minorities and women owned business with each federally funded opportunity.

**Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.**

Numerous studies have been conducted since the AI was updated in 2010. The common factor throughout all of the documents and data show that the barriers listed as goals in both the 2004 AI and the updated 2010 AI are still the same barriers. These barriers have not been reduced but instead there has been a rise in the contributing factors to the lack of equal opportunity in housing, transportation, education, jobs, and financial services.

The data supports a need for education to the general public as well as private stakeholders. Although an immense amount of work has been done over the years through studies, publications, workshops, conferences, table talks, etc. the contributing factors of NIMBYism, misunderstanding or lack of understanding of fair housing rights, landlord/tenant rights, political will and significant changes in zoning and development requirements have not advanced the actual significant accomplishment to the goals.

The current goals established with this update is reflective of the robust community engagement that was conducted from September 2016 through April 2018. Meetings with stakeholders, neighborhoods, non-profit as well as for profit developers, political entities, public housing residents as well as other stakeholders; that were conducted by both the City, Heartland Workforce, The Empowerment Network, Metropolitan Area Planning Agency (MAPA), the Community Foundation and others formulated goals and strategies that the AI mirrors. The barriers, concerns, and action items are consistent throughout.

An enormous amount of effort is being done to bring groups together to tackle the issues in a cohesive and aggressive way. Fair Housing discussions that include diversity and inclusion in all aspects of the community are at the forefront of most discussions in the City. The AFFH process and Regional Assessment of Fair Housing have brought to the forefront things that the community needs to address. Changes in policies, processes, and education must be made in order to accomplish past and present goals.
Moving forward over the next five years, program partners are equipped with data and strategies. Accomplishing AFH goals will make dynamic changes in barriers to fair housing. Equal access to opportunity will be discussed in the development of housing plans, service plans, and action plans. Providing fair housing education to elected officials, neighborhood leaders, private funders, stakeholders, and residents throughout the city, will be a priority. Program and collaborative partners are committed to accomplishing past and present fair housing goals.

COUNCIL BLUFFS

The City completed its *Analysis of Impediments to Fair Housing Choice* in June 2012. Overall, the City and MHA has been successful meeting the smaller goals, however continues to work on the larger, long-term goals.

The following potential impediments were identified:

1. *The City should amend its Consolidated Plan to modify its definitions of “area of concentrated minorities” and “area of concentration of low income person.”*

   This item was completed.

2. *The City’s increasing diverse minority population may require language accommodations to ensure that all residents can access City programs and services.*

   The City works with a local interpreter when needed. Program information is not provided in additional languages—specifically, Spanish. The City will address this concern in the current assessment to better reach these individuals.

3. *Members of protected classes are under-represented on City appointed boards and commissions dealing with housing issues.*

   The City actively recruits individuals of protected classes as board and commission positions become available. Boards and commissions that deal with fair housing currently have the following makeup:

   *Community Development Advisory Committee (CDAC): gender balanced*

   - Civil Rights Commission (CRC): gender balanced with two racial minorities and two LGBTQ+ representatives
   - Planning Commission: gender balanced
   - Zoning Board of Adjustment: gender balanced with one racial minority
Historic Preservation: gender balanced

4. There is an inadequate supply of affordable rental housing that is accessible to City residents.

Since 2013, the City has constructed two low-to-moderate income multi-family rental projects. One of the 36-unit projects is designed for all units to be adaptable for disabled residents as well as one unit accessible for sensory impairments. The other includes at least two accessible units for mobility impairment and one accessible for sensory impairment.

5. Minority households, in particular Black households, have greater difficulty becoming homeowners because of lower incomes.

The City continues to provide financial assistance in the form of down payment assistance to income qualified home buyers as well as fund homeownership counseling and financial management education for lower income households, particularly minority households. Last year, Family Housing Advisory Services (FHAS) provided counseling for 193 households/375 individuals. Of these, 27 identified as Hispanic, 25 as Black, 1 as Asian, 4 identified as Native American, 14 as Black/White, 5 as Native American/Black and 3 as Other Multiracial.

6. Public transit service is largely limited to day and evening hours, thus restricting accessibility to employment opportunities for persons working evening and overnight shifts.

In 2016, route hours were extended to 11pm instead of ending at 6pm in Council Bluffs. Additionally, the City formed a partnership with Southwest Iowa Transit Agency to provide paratransit service on a contract basis. Public transportation is still limited in the City and continues to be a high priority.

7. The City’s supply of decent, affordable housing remains inadequate.

Decent, affordable housing in Council Bluffs continues to be an issue. Since 2012, the City has constructed 28 single-family houses that were given down payment assistance in the amount of $435,000. Additionally, 72 multi-family rental units have been constructed with 27 earmarked for families at or below the median family income (MFI).

8. The majority of fair housing complaints filed through HUD and ICRC in Council Bluffs involved disability and race as basis for discrimination.
According to the Iowa Civil Rights Commission, Pottawattamie County is comprised of 2.56% of the 1,557 jurisdictional complaints filed in the State of Iowa in FY2016. There was a slight decrease in the number of employment, housing and public accommodation complaints but a slight increase in education and credit complaints. For Council Bluffs specifically, there have been 10 cases since January 2015 with two cases remaining open. All but one of the complaints were filed with residents in the 51501 zip code. Of the 10 cases, seven were disability, one race, one retaliation and one was multiple categories.

9. The City’s Zoning Ordinance is not consistent with the Fair Housing Act.

The Zoning Ordinance was amended to remove the distancing requirements on “family homes” (group homes).

10. The City’s 1994 Comprehensive Plan should be updated to reflect specific policies and strategies to address affordable housing needs for all housing types.

The Bluffs Tomorrow 2030: Comprehensive Plan was adopted in September 2014. This plan includes a housing land use plan as well as implementation strategies for interconnecting housing with transportation, education, health care, parks and recreation, and commercial development. The plan outlines five residential land uses including rural residential/agriculture, low-density residential, medium-density residential, high-density residential and multifamily/mixed-use. These different levels of zoning allow the City to customize development to fit the needs of specific areas and retain the character of neighborhoods. Under the “Neighborhood and Housing” goal of “enhance and maintain the City’s neighborhoods to provide housing, character, and supporting amenities to retain and attract residents to Council Bluffs,” the City identifies the following objectives relating to fair housing:

i. Recognize and preserve the character of Council Bluffs’ individual neighborhoods through contextually appropriate infill development and the maintenance of streets, trees, and other public areas.

ii. Provide quality senior housing or supportive services to allow senior citizens to remain in the community.

iii. Minimize the impact of the conversion of single-family structures to multi-family housing.
iv. Encourage the development of multi-family, townhome, and small-lot single-family housing along existing bus transit lines on Broadway, 23rd Avenue, and in downtown.

v. Require developers to provide local amenities (i.e. open space, trails, detention, etc.) that benefit residents.

11. *There is insufficient evidence to support MHA’s compliance with Section 504 for the Rehabilitation Act of 1973.*

In January 2017, MHA adopted its Admissions and Continued Occupancy Policy which directly addresses nondiscrimination, policies related to persons with disabilities and violence against women. This policy is published on their website at mhacb.org.

12. *Mortgage loan denials and high-cost lending disproportionately affect minority applicants in Council Bluffs, similar to national trends.*

Most recent data regarding this impediment is 2008. The City continues to work with FHAS to provide homeowner counseling as well as Iowa Legal Aid in Council Bluffs and the Iowa Civil Rights Commission to combat lending discrimination.

13. *The Daily Nonpareil newspaper does not includes a publisher’s policy. In addition, rental real estate advertisements that prohibit or limit pets may discourage persons with service animals from considering these units.*

*The Daily Nonpareil’s* website includes a terms of use section. This outlines the liabilities of BH Media Group, Inc and all government regulations.

Previous goals were examined and discussed during the process to see how many have been accomplished and what areas continued to be problems for Council Bluffs. This helped shape the new goals outlined in the AFH for the City and MHA. Areas we continue to fall short are our need for affordable housing for all family types as well as accessibility needs and transportation. These issues are very large and thus are ongoing. Areas we have excelled are policy updates. All suggested updates are completed.

Municipal Housing Agency has the following goals in its Five Year Plan:

- To provide safe and sanitary living conditions for very low income families while maintaining their rent payments at an affordable level.
To operate a socially and fiscally sound public housing agency that provides drug free, decent, safe and sanitary housing with a suitable living environment for residents and their families.

To promote personal, economic and social upward mobility to assist residents to make the transition from subsidized to unsubsidized housing.

To minimize public housing vacancies and continue to improve turnaround days to maintain MHA’s consistent High Performer Status in PHAS

Housing for the Elderly and Disabled and low income families in our Public Housing units

Housing for the Elderly, Disabled, and Families in our Section 8 Program

Continue MHA staff training on housing software and HUD regulation changes

Maintain the 2015 Green Physical Needs Assessment (GPNA), which will assist MHA in Strategic Planning and a 20-Year Action Plan for Capital Funds Improvements

Working with Non-Profit Sister Company Municipal Homes, Inc. which will partner with developers, or initiate plans to construct more “affordable housing” in the community for single family, disabled, transitional, and group homes

Family Self Sufficiency (FSS) is a voluntary program open to all of the Municipal Housing Agency’s Housing Choice Voucher participants, which assists families in obtaining the skills that they need to achieve financial independence. Clients are assisted by the FSS Program Coordinator and are referred to other community agencies where clients access services such as education, job training, counseling, job search assistance, financial aid assistance, workshops, support meetings, and other appropriate services to assist the family. We currently encourage all participants to enroll in financial and homeownership classes to help prepare them at the end of their five year Contract of Participation should they choose to purchase a home.

FSS Goals and Objectives:

- Assist more voucher holders in becoming self-sufficient by increasing the program to at least 25 participants
- Update our Action Plan to reflect our program more accurately and completely
- Continue to apply and receive funding for the Program Coordinator position through grant
- Work on building our Program Coordinating Committees (PCC) to allow more resources for participants to utilize
- Utilize available technology to increase program participation and communicate with current and potential participant
- Create a welcoming and educational environment within our office to provide information regarding local resources and activities
Search for and participate in local vendor events to help promote our agency and spread the awareness of the FSS program opportunities

**Municipal Housing Agency’s Progress in Meeting Mission and Goals:**

- Municipal Housing Agency has increased HC Veterans Affairs Supportive Housing (VASH) Vouchers from 10 to 20 and will be receptive to HUD should anymore become available. The Section 8 Program had 45 participants go off the program in the last 12 months and 11 of those are due to economic betterment.
- Three public housing, two HCV and one board member attended Staff Training on new HUD regulation changes in 2016.
- The FSS Coordinator attended an extensive training for her FSS program. HUD staff met with FSS Coordinator to assure to maximize the benefits of MHA’s FSS Program.

Within the past 12 months, Municipal Housing Agency’s Family Self Sufficiency Program has had four out of six participants graduate. Amongst these participants, they received $55,088.31 in escrow funds. One of those graduates went into homeownership and used the money from her escrow account as a large down payment on her home. Another graduate successfully left the Housing Choice Voucher Program because her household income exceeded our income guidelines after obtaining employment from a local employer.

Several facility updates have been completed including fire suppression and alarms, cameras, water and sewer upgrades, roof replacements, and unit updates for general aesthetics and accessibility. Additionally, MHA has completed many major projects to keep up with changes in regulations, such as making both properties completely non-smoking, different regulatory items that must be included in our Admissions and Continued Occupancy Policy, as well as other policies that need to be updated due to situations that have presented themselves over the course of time.

By having these goals and making such improvements as these for the Municipal Housing Agency, they are continuing to uphold the mission: It is the intent of the Municipal Housing Agency to provide affordable, decent, safe and sanitary housing to low income families that will promote economic mobility and a suitable living environment free from discrimination.

The Municipal Housing Agency has received grant money from the Council Bluffs Housing Trust Fund to complete various renovations to our Regal Towers and Dudley Court properties. These grant monies were used to renovate existing units and make them more accessible, through walk-in and roll-in shower renovations, providing high-rise toilets in units, and other accessible accommodations as well. The Municipal
Housing Agency will continue to apply for grant monies from the Council Bluffs Housing Trust Fund to renovate units to make them more accessible, and to combat the issue that the region faces with a lack of accessible units in a range of sizes.

The RAB and tenants give feedback to the Municipal Housing Agency regarding what they would like to see as goals for the Housing Agency. The information is taken from the Resident Advisory Board and tenants, to then be considered for future goals. The Municipal Housing Agency's Public Housing serves mainly elderly and disabled individuals; therefore, many of the goals to renovate the structures are to make the buildings more accessible for the tenants, as well as assist tenants/participants in becoming as self-sufficient as possible.

BELLEVUE

The City of Bellevue completed its previously Analysis of Impediments to Fair Housing Choice in 2014 in conjunction with the 2014-2018 Consolidated Plan. As part of the analysis, the City identified impediments to fair housing in the public sector and private sector as well as identified in both areas. Impediments were identified and the City efforts to address the impediment are listed below.

1. **Impediment:** An inadequate supply of accessible housing is a problem that plagues most housing markets.

   a. **Efforts to address the impediment:** Through review and updates, visitability has remained a part of the zoning ordinance. The City continue to encourage developers to focus on visitability in new developments. The CDBG Housing Rehabilitation was updated to focus on critical repairs for elderly and disabled homeowners with focus on accessibility. Once a house has been evaluated, any accessibility rehabilitation needed is started immediately following the environmental review completion.

2. **Impediment:** Access to fair housing information and education could be improved.

   a. **Efforts to address impediment:** The City of Bellevue continues efforts to provide information regarding fair housing to residents. The City maintains a fair housing page on the website and updates the information as needed. Additional agencies, advocacy groups, and housing counseling agencies are used as reference for fair housing questions. While all agencies remain in contact, a fair housing committee has not been formed due to lack of interest and time available to commit to additional meetings at this time.
The City is still working to host a fair housing conference in Bellevue or Sarpy County and hopes to identify and recruit additional partners to assist with hosting a conference for non-profit agencies and private sector businesses.

3. Impediment: Affordable housing has limited access to transportation, social service, and job centers.

Efforts to address impediments: The City participated in the Heartland 2050 planning model for the Omaha-Council Bluffs MSA and work with the surrounding communities to identify and develop plans to increase the amount of affordable housing near transportation opportunities. Continued efforts are needed as MAPA completes a transportation plan for Sarpy County.

Private Sector
1. Impediment: The City of Bellevue lacks available affordable housing choices. There is a lack of larger units (with three or more bedrooms) which is considered to be a fair housing impediment because it disproportionately impacts at least two protected class groups – households with children and extended families, as well as minority households, many of which tend to be larger than white households.

   a. Efforts to address impediments: The City continues to identify and pursue outside funding sources and form partnerships to position itself when additional federal and state funds become available.

Public & Private Sector
1. Impediment: Lack of knowledge by housing consumers of Fair Housing Laws, discriminatory practices, and enforcement agencies and procedures. Further, those members of protected classes that suspecting discrimination may lack the confidence to report the incident or proceed with filing a fair housing complaint because of the investigating entity.

   a. Efforts to address impediments: As mentioned above, the City of Bellevue continues to maintain up to date information for residents regarding fair housing laws and enforcement. Due to limited funding, the City has not partnered with a local fair housing agency to offer outreach and information directly to residents.
2. **Impediment:** The City of Bellevue staff lacks knowledge of the Limited English Proficiency Plan and the requirements within. The LEP population although it does not represent a wide variety of languages and dialects yet, is present in the Bellevue area and is growing. Translation services can be costly to provide and it can be difficult to secure quality translators.

   a. **Efforts to address impediments:** The City of Bellevue worked with all City Departments to develop a LEP plan and include all current available options for city services. In addition, the collaboration assisted to improve coordination of LEP efforts within Departments and the city limits to ensure all close, existing resources are utilized first. The City has worked with other area agency to create a comprehensive list of service providers as a resource.

The City of Bellevue utilizes experiences and knowledge from efforts to address past identified fair housing impediments in moving forward with future fair housing plans. A review of past impediments and efforts to address the need were used a starting point to develop a new plan. Partnerships and collaboration efforts developed in the previous plan will be used to develop future efforts to address fair housing issues on an area wide basis.
SECTION V.

Fair Housing Analysis

According to the HUD Assessment of Fair Housing Tool (AFHT), Section V includes the following information:

A. Demographic Summary
B. General Issues
   i. Segregation/Integration
   ii. Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAPs)
   iii. Disparities in Access to Opportunity
   iv. Disproportionate Housing Needs
C. Publicly Supported Housing Analysis
D. Disability and Access Analysis
E. Fair Housing Enforcement, Outreach Capacity, and Resources

Regional Versus Jurisdiction Analysis.
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.
HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA
Douglas County Housing Authority- DCHA
Council Bluffs Municipal Housing Agency- MHA
Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. All tables and data can be accessed online at: https://egis.hud.gov/affht/.
Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
Demographics 2010
1 Dot = 75
- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

National Origin [Jurisdiction]
(Top 5 most populous)
1 Dot = 25 People
- Mexico
- India
- El Salvador
- Guatemala
- Thailand
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

1. **Downtown**: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
2. **Mid-City**: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
3. **Bluff-Willow**: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
4. **Kanesville-Tinley**: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
5. **North End**: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
6. **West End**: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
7. **South End**: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
8. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
9. Lake Manawa: subdivisions east of Lake Manawa
10. East End: newer area to the east of Bluff-Willow and the North End to the city limits

**BELLEVUE**

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

**A. Demographic Summary**
1. Describe the demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Table V-1. Population Growth and Percentage Change

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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Region</td>
<td>685,797</td>
<td>767,041</td>
<td>865,350</td>
<td>904,834</td>
<td>11.85%</td>
<td>12.82%</td>
<td>31.94%</td>
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</tr>
<tr>
<td>Omaha</td>
<td>335,795</td>
<td>390,007</td>
<td>408,958</td>
<td>443,072</td>
<td>16.14%</td>
<td>4.86%</td>
<td>31.95%</td>
<td></td>
</tr>
<tr>
<td>Council Bluffs</td>
<td>54,315</td>
<td>58,268</td>
<td>62,326</td>
<td>62,597</td>
<td>7.28%</td>
<td>6.96%</td>
<td>15.25%</td>
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</tr>
<tr>
<td>Bellevue</td>
<td>30,982</td>
<td>44,382</td>
<td>50,137</td>
<td>52,993</td>
<td>43.25%</td>
<td>12.97%</td>
<td>71.04%</td>
<td></td>
</tr>
</tbody>
</table>

Sources: Social Explorer Dataset(SE), Census 1990, Social Explorer; U.S. Census Bureau, Social Explorer Tables(SE), Census 2000, U.S. Census Bureau and Social Explorer, Social Explorer Tables(SE), Census 2010, Census Bureau; Social Explorer, Social Explorer Tables: ACS 2016 (5-Year Estimates)(SE), ACS 2016 (5-Year Estimates), Social Explorer; U.S. Census Bureau

The Omaha Council Bluffs region has experienced growth in the total population from 1990 to 2016. According to the *Heartland 2050 Vision* (Heartland 2050 Vision, 2014) the eight county region is projected to increase in total population to 1,228,634 by the year 2050. This projection includes a population growth in all counties with the exception of Harrison County, IA. Sarpy county is anticipating the largest growth, with a current projection of an additional 149,000 residents by 2050, almost doubling the current population.

All participating jurisdictions have also seen total population growth from 1990 to 2016. Omaha’s growth over the period is almost identical to the growth of the region. Although Council Bluffs had a lower percentage of total population growth, it still increased steadily over the 26 year period. The city of Bellevue experienced the greatest change in population, with more than double the percentage growth as the region and other participating jurisdictions.

Table V-2. Regional Demographic Trends
The demographics of the region mirror the trends of the participating jurisdictions. Between 1990 and 2010, the White, Non-Hispanic population in the region decreased by 9.93 percentage points. Each of the other racial/ethnic population categories increased in number and in proportion. Black, Hispanic, Asian or Pacific Islander, and Native American populations all increased over the same 20 year period. The Hispanic population had the largest growth in the region, increasing from 2.43% in 1990 to 8.96% in 2010.
The number of foreign-born residents and persons with limited English proficiency also increased from 1990 to 2010. According to the *Equitable Growth Profile of the Omaha-Council Bluffs Region*, data from a five year average showed that in 2012 15% of all children in the region had at least one immigrant parent (PolicyLink & PERE, 2014).

**Table V-3 NE IA Region National Origin**
According to HUD Table 1, across the region the number one country of origin for foreign-born residents is Mexico at 3.06% and the number one language for limited English proficiency residents is Spanish. All other origins and languages make up less than 1% of the population. India, El Salvador, Vietnam, Guatemala, and China are the next five most populous national origin groups.

The remaining categories in demographics trends for the region from 1990 to 2010 reflect minimal changes. The number of males increased slightly over time, but are almost equal in 2010 with 49.33% of the region identifying as male and 50.67% female. Trends in age groups fluctuated less than 2% in a category over the twenty year period. The current demographics show the region having 26.25% of persons under age 18, 62.64% of persons ages 18-64, and 11.11% of the population over 65 years of age. According to 2012 data from the Equitable Growth Profile, Hispanic residents have a median age of 23 compared to a median age of 27 for residents who identify as Black, and median age of 38 for the White, Non-Hispanic population in the region (PolicyLink & PERE 2014). Families with children have decreased slightly from 51.94% in 1990 to 48.23% in 2010.

### Table V-4 Demographic Trends for Jurisdictions

<table>
<thead>
<tr>
<th>National Origin</th>
<th>#</th>
<th>Country</th>
<th>Population</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1 country of origin</td>
<td>1</td>
<td>Mexico</td>
<td>24,843</td>
<td>3.06%</td>
</tr>
<tr>
<td>#2 country of origin</td>
<td>2</td>
<td>India</td>
<td>3,433</td>
<td>0.42%</td>
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<tr>
<td>#3 country of origin</td>
<td>3</td>
<td>El Salvador</td>
<td>2,272</td>
<td>0.28%</td>
</tr>
<tr>
<td>#4 country of origin</td>
<td>4</td>
<td>Vietnam</td>
<td>2,013</td>
<td>0.25%</td>
</tr>
<tr>
<td>#5 country of origin</td>
<td>5</td>
<td>Guatemala</td>
<td>1,710</td>
<td>0.21%</td>
</tr>
<tr>
<td>#6 country of origin</td>
<td>6</td>
<td>China excl. Hong Kong &amp; Taiwan</td>
<td>1,493</td>
<td>0.18%</td>
</tr>
<tr>
<td>#7 country of origin</td>
<td>7</td>
<td>Korea</td>
<td>1,404</td>
<td>0.17%</td>
</tr>
<tr>
<td>#8 country of origin</td>
<td>8</td>
<td>Thailand</td>
<td>1,326</td>
<td>0.16%</td>
</tr>
<tr>
<td>#9 country of origin</td>
<td>9</td>
<td>Philippines</td>
<td>1,311</td>
<td>0.16%</td>
</tr>
<tr>
<td>#10 country of origin</td>
<td>10</td>
<td>Burma</td>
<td>1,056</td>
<td>0.13%</td>
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</table>

Source: HUD Table 1 Demographics NE-IA Region
<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>83.73%</td>
<td>76.47%</td>
<td>68.67%</td>
<td>96.18%</td>
<td>92.78%</td>
<td>87.29%</td>
<td>87.83%</td>
<td>83.26%</td>
<td>76.42%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>11.72%</td>
<td>13.24%</td>
<td>14.53%</td>
<td>0.75%</td>
<td>1.32%</td>
<td>2.45%</td>
<td>5.88%</td>
<td>6.84%</td>
<td>7.35%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>2.83%</td>
<td>7.19%</td>
<td>12.72%</td>
<td>2.34%</td>
<td>4.26%</td>
<td>8.25%</td>
<td>3.78%</td>
<td>5.65%</td>
<td>11.57%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>0.96%</td>
<td>2.05%</td>
<td>2.99%</td>
<td>0.36%</td>
<td>0.82%</td>
<td>1.04%</td>
<td>2.04%</td>
<td>3.13%</td>
<td>3.52%</td>
</tr>
<tr>
<td>Native American</td>
<td>0.56%</td>
<td>0.83%</td>
<td>0.86%</td>
<td>0.22%</td>
<td>0.71%</td>
<td>0.89%</td>
<td>0.31%</td>
<td>0.82%</td>
<td>0.94%</td>
</tr>
</tbody>
</table>

**National Origin**

| Foreign-born          | 2.69% | 6.30% | 8.90% | 0.99% | 2.61% | 4.01% | 3.75% | 5.29% | 8.42% |

**LEP (Limited English Proficiency)**

| LEP                   | 1.69% | 4.48% | 5.94% | .98%  | 1.96% | 3.45% | 1.64% | 2.77% | 4.92% |

**Sex**

| Male                  | 47.99%| 48.86%| 49.16%| 47.27%| 48.45%| 48.70%| 49.98%| 49.60%| 49.28%|
| Female                | 52.01%| 51.14%| 50.84%| 52.73%| 51.54%| 51.30%| 50.02%| 50.40%| 50.72%|

**Age**

| Under 18             | 26.59%| 26.81%| 25.25%| 27.00%| 26.48%| 24.18%| 29.38%| 28.72%| 26.70%|
| 18-64                | 61.62%| 61.82%| 63.59%| 59.60%| 60.29%| 62.33%| 65.51%| 62.37%| 62.03%|
| 65+                  | 11.78%| 11.37%| 11.16%| 13.40%| 13.23%| 13.49%| 6.09% | 8.91% | 11.27%|

**Family Type**

| Families with children| 50.59%| 50.32%| 47.92%| 47.81%| 44.09%| 44.09%| 54.00%| 50.54%| 47.68%|
Demographic Trends

Similar to the trends across the region, from 1990 to 2010 the racial and ethnic compositions of Omaha, Council Bluffs, and Bellevue continue to trend toward greater diversity. The White, Non-Hispanic population shows a decline in proportion and number; however, this population remains the largest racial group by a significant margin.

Omaha’s population reflected the greatest decrease in percentage of White residents and the greatest increase in percentage of all other categories with the exception of Native Americans. Council Bluffs saw the smallest percentage of decrease in the White population and the least amount of growth in all other areas with the exception of the Native American population. The Native American population in both Council Bluffs and Bellevue both doubled, but remains at less than 1% of the population for each city.

The most measurable change in demographics for all three cities was the increase in the Hispanic population. In the case of Bellevue and Council Bluffs, the number of Hispanic residents more than tripled between 1990 and 2010. In Omaha, Hispanic residents made up 12.72% of the population in 2010, which is more than five times greater in comparison to 1990.

All jurisdictions also experienced steady growth in foreign-born residents between 1990 and 2010. Omaha’s foreign-born population increased from 10,220 in 1990 to nearly 38,000 in 2010, comprising nearly nine percent of the population. Bellevue experienced similar growth with 8.42% of the total population in 2010 identifying as foreign-born. Although only 4.01% of the residents of Council Bluffs are foreign-born, the population has quadrupled from less than 1% in 1990. Residents having limited English proficiency (LEP) also increased for all three jurisdictions as the foreign-born population increased. The number one LEP identified language for all jurisdictions was Spanish.

The small gap between the number of females and males in the population narrowed between 1990 and 2010, with a slight increase of males in both Omaha and Council Bluffs. The number of women increased in Bellevue, by under 1%.

Omaha and Council Bluffs have similar trends in age fluctuations from 1990 to 2010. Indications of an aging population are evident, but subtle. The largest category, the population of 18 to 64, increased in proportion by approximately two percentage points over the 20 year period. Baby boomers make up a large portion of this age category, which is anticipated to cause an increase in the category of people 65 years and older in future decades. This population did see a decline from 1990 to 2010. In contrast, Bellevue has already experienced an increase of 5% in the 65 years and older category.
over the same period. According to 2010 Census Data, the average age for a resident of Omaha is 33.5 years, for Council Bluffs 36.6 years, and for Bellevue 33.6 years.

All jurisdictions experienced a decrease in persons under age 18. This is also reflected in the decrease in the number of families with children in the same areas from 1990 to 2010. According to 2010 US Census Data, the average size of households in Omaha for Omaha is 2.53, for Council Bluffs 2.43, and for Bellevue 2.62.

**Table V-5 Regional Disability by Type**

<table>
<thead>
<tr>
<th>Disability Type</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hearing difficulty</td>
<td>27,478</td>
<td>3.44%</td>
</tr>
<tr>
<td>Vision difficulty</td>
<td>14,601</td>
<td>1.83%</td>
</tr>
<tr>
<td>Cognitive difficulty</td>
<td>32,394</td>
<td>4.06%</td>
</tr>
<tr>
<td>Ambulatory difficulty</td>
<td>42,837</td>
<td>5.37%</td>
</tr>
<tr>
<td>Self-care difficulty</td>
<td>15,027</td>
<td>1.88%</td>
</tr>
<tr>
<td>Independent living difficulty</td>
<td>27,896</td>
<td>3.50%</td>
</tr>
</tbody>
</table>

Source: HUD Table 1 Demographics

HUD demographics for the disability community lists the number and percentage of residents in the region according to disability type. According to HUD Table 1, the number one reported disability type is ambulatory difficulty, followed by cognitive difficulties and difficulty with independent living. In the region, 42,837 residents were identified as having ambulatory difficulty, highlighting a need for accessible housing and housing accommodations. Additional demographic details for the disability community can be found in Section V-D Disability and Access.
B. **General Issues**
The issues discussed in this section address additional trends in regional demographics. HUD requests that the following topics be included under “General Issues”:

i. Segregation and Integration

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

iii. Disparities in Access to Opportunity
   a. Education
   b. Employment
   c. Transportation
   d. Low Poverty Neighborhoods
   e. Environmentally Healthy Neighborhoods
   f. Patterns in Disparities

iv. Disproportionate Housing Needs
Introduction

Regional Versus Jurisdiction Analysis
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA
Douglas County Housing Authority- DCHA
Council Bluffs Municipal Housing Agency- MHA
Bellevue Housing Authority- BHA
Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. All tables and data can be accessed online at: 
https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

11. Downtown: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
12. Mid-City: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
13. Bluff-Willow: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
14. Kanesville-Tinley: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
15. North End: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
16. West End: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
17. South End: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

i. Segregation/Integration
Part 1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The Dissimilarity Index (DI), is used to measure segregation by representing how equally or unequally racial and/or ethnic groups are distributed across a geographic area. HUD’s DI tool uses the White, Non-Hispanic group as the base for comparison of other racial and ethnic distribution. The DI has a range of values to aid in the evaluation of levels of segregations. Index scores between 0 and 39 indicate no or low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate a high level of segregation.

Table V-6 Dissimilarity Index

<table>
<thead>
<tr>
<th>Racial/Ethnic Dissimilarity Index</th>
<th>Omaha-Council Bluffs Region</th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>Current</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td></td>
<td>55.35</td>
<td>49.86</td>
<td>44.49</td>
<td>49.78</td>
</tr>
<tr>
<td>Black/White</td>
<td></td>
<td>71.47</td>
<td>65.38</td>
<td>58.21</td>
<td>64.70</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td></td>
<td>38.76</td>
<td>48.90</td>
<td>48.79</td>
<td>51.25</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td></td>
<td>34.58</td>
<td>34.32</td>
<td>33.23</td>
<td>41.50</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Racial/Ethnic Dissimilarity Index</th>
<th>Omaha</th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>Current</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td></td>
<td>57.80</td>
<td>51.28</td>
<td>46.36</td>
<td>51.07</td>
</tr>
<tr>
<td>Black/White</td>
<td></td>
<td>72.84</td>
<td>65.81</td>
<td>58.32</td>
<td>63.44</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td></td>
<td>41.37</td>
<td>54.16</td>
<td>54.24</td>
<td>56.95</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td></td>
<td>24.27</td>
<td>26.84</td>
<td>29.39</td>
<td>39.84</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Racial/Ethnic Dissimilarity Index</th>
<th>Council Bluffs</th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>Current</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black/White</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic/White</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Racial/Ethnic Dissimilarity Index</td>
<td>1990</td>
<td>2000</td>
<td>2010</td>
<td>Current</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>------</td>
<td>------</td>
<td>------</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>Non-White/White</td>
<td>25.05</td>
<td>22.63</td>
<td>20.71</td>
<td>26.43</td>
<td></td>
</tr>
<tr>
<td>Black/White</td>
<td>40.90</td>
<td>26.19</td>
<td>21.84</td>
<td>39.37</td>
<td></td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>25.70</td>
<td>25.34</td>
<td>25.44</td>
<td>27.74</td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>21.45</td>
<td>13.69</td>
<td>17.90</td>
<td>29.23</td>
<td></td>
</tr>
</tbody>
</table>

Bellevue

<table>
<thead>
<tr>
<th>Racial/Ethnic Dissimilarity Index</th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>Current</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td>15.94</td>
<td>15.33</td>
<td>13.94</td>
<td>20.05</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>11.55</td>
<td>18.61</td>
<td>24.35</td>
<td>28.32</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>25.05</td>
<td>19.61</td>
<td>14.19</td>
<td>24.87</td>
</tr>
</tbody>
</table>

Source: HUD Table 3 Racial/Ethnic Dissimilarity Trends

According to HUD’s suggestions in regard to the Dissimilarity Index Ranges, the Omaha Council Bluffs Region has moderate to high levels of segregation in all categories. The region has experienced an increase in segregation levels from 1990 to the present in the distribution between Hispanic and Asian or Pacific Islander identifying residents and White residents. This level is currently considered moderate segregation. Although there has been a decrease in segregation in the comparison between White and Non-White residents over the same period, the current rating shows moderate levels of segregation in the region. The comparison between distribution of White and Black residents indicates the highest segregation in the region. Index numbers have decreased from 1990 to current, but have increased from 2010 to the present and segregation levels remain high.

The protected classes measured by the DI indicate that across the region in each participating jurisdiction, Black, Non-Hispanic residents experience the highest levels of segregation, followed by Hispanic residents. According to the dissimilarity index, Omaha has a higher index score for segregation between Non-White and White residents than the region; however, Omaha also has the largest population of Non-White residents in
the region. The DI also shows Omaha having higher levels of segregation than Council Bluffs and Bellevue in all categories of comparison.

The City of Omaha borders Council Bluffs to the west and Bellevue to the north, yet the percentage of minority residents is higher for Omaha than either city. The percentage of the population that identifies as Black, Non-Hispanic in Omaha is double that of Bellevue’s population and almost seven times greater than the percentage of Black residents in Council Bluffs. Regardless of population size, the increase in percentage of minority residents should be considered. While Bellevue and Council Bluffs have lower DI index scores than Omaha, these jurisdictions have notably fewer minority residents. Additional factors impacting the lack of migration of minority residents from eastern Omaha into the surrounding cities should be explored.

OMAHA

Similar to the region, Omaha has moderate to high levels of segregation in every comparison across the Dissimilarity Index. Although a decrease occurred from 1990 to 2010 in the scores comparing Non-White and White residents and Black and White residents, there was an increase in segregation over the same period when comparing White residents to Hispanic and Asian or Pacific Islanders. All categories saw an increase in segregation when comparing 2010 and current scores. Segregation levels comparing Non-White and Asian Pacific Islander to White are moderate, and Black and Hispanic to White segregation levels are high.

COUNCIL BLUFFS

Although Council Bluffs has a smaller population of Non-White residents compared to Omaha and the Region, according to the dissimilarity index, it also has lower levels of segregation than Omaha and the Region in all categories. The scores for Council Bluffs indicate low levels of segregation in all categories in 2010, but a spike in the index scores between 2010 and the current year for all groups increased the Black and White distribution to a moderate segregation level. There was also an increase of over 11 points in the segregation of Asian or Pacific Islander and White residents between 2010 and the current year.

BELLEVUE
According to the Dissimilarity Index, Bellevue experiences the lowest levels of segregation of the three jurisdictions with the exception of the distribution of Hispanic and White residents. Bellevue currently has scores that indicate low segregation, and has experienced a decrease in most categories from 1990 to 2010. However, as the Hispanic population in Bellevue has increased from 1990 to 2010 and into the current year, the DI index scores have also increased. Bellevue experience the same spike in segregation as the surrounding region with numbers rising between 2010 and the current year.

In Bellevue, Hispanic households experience the highest levels of segregation for the jurisdiction followed closely by Black and Asian households. There was a decrease in the average Dissimilarity Index for Non-White, Black, and Asians between 1990 and 2010. This could be due to annexation of additional land by the City of Bellevue. This could also cause questions with the data provided due to the level of difference between 2010 and current levels.

Overall, these dissimilarly index values are significantly lower than the Omaha-Council Bluffs Region where Black households experience the most segregation with a dissimilarity index of 64.70, which is 36.40 points higher than the highest dissimilarity index in Bellevue.

The segregation of Hispanic families in Bellevue has risen over the past 25 years indicated by the increase of the dissimilarity index from 11.55 to 28.32. The majority of Hispanic residents reside in northern Bellevue which is closer to Douglas County, in southeastern Omaha, where a large population of Hispanic households are located.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.
Many areas and communities with high levels of segregation in the Omaha-Council Bluffs region are the result of ordinances/practices that began over a century ago. In 1920, housing segregation was being driven by the federal government agency, Home Owners’ Loan Corporation (HOLC) through a practice known as “redlining”. This agency was responsible for working with lenders and developers to create a security map that would ultimately determine areas where home loans/mortgages should be issued. These maps designated areas as green (best), blue (still desirable), yellow (definitely declining), and red (hazardous). Areas that were predominantly Black or Hispanic were labeled red (hazardous) and areas that were mostly White were either green (best) or blue (still desirable).

The hazardous or declining designation crippled many Black and Hispanic communities across the nation. The labels prevented investment in the form of home and business loans, therefore stifling economic development for redlined neighborhoods. Areas in North and South Omaha, labeled “colored”, did not have access to federal mortgages, limiting the ability of minority residents to secure housing, accumulate wealth, and/or invest in their own neighborhoods. While the Fair Housing Act of 1968 ended legal discrimination through redlining, the impact remains today.
Figure V-2 HOLC Redlining Map Omaha 1935

Source: 1935 HOLC Redlining Map, Omaha and Vicinity - CREDIT PALMA STRAND
The same areas of North and South Omaha designated as “colored” in 1935 currently have the highest concentrations of Non-White residents across the eight county region today. The same northeastern and southeastern portions of Omaha have a majority of the oldest housing stock, highest number of environmental concerns, greatest housing burden, largest amount of publicly supported housing, but also the most affordable housing across the region. These factors contribute to the segregation of people of color, the LEP community, elderly persons, and persons in publicly supported housing to the census tract and neighborhoods that were designated “declining” and “dangerous” in the 1920’s.

**Figure V- 3. Omaha-Council Bluffs Regional Demographics**

Map 1 from the HUD Data & Mapping Tool is used to identify areas with high segregation and/or integration. Demographic groups are color coded as follows: Non-Hispanic White (orange dots), Black (green dots), and Hispanic (blue dots), Asian/Pacific Islander non-Hispanic (purple dots) and Multiracial (light green dots). The map reveals segregation patterns in the Omaha-Council Bluffs region. The majority of the population across the region is white, but obvious concentrations of Non-White residents are present in Omaha, Council Bluffs, and Bellevue. As mentioned in the previous section, the majority of these residents reside in Omaha. These cities also have the highest populations in the region. Although an increase in total population may
naturally lead to a more diverse population, the following map (HUD Map 1), shows Non-White persons are further segregated to specific areas within the jurisdictions.

**Figure V- 4 Omaha, Council Bluffs, and Bellevue Demographics**

When removing White, Non-Hispanic residents from Map 1, the concentration of different races and ethnicities to specific geographic areas becomes even more apparent, especially in Omaha. Residents with LEP are concentrated similarly.

HUD Map 4 LEP below shows the highest populations of residents with limited English proficiency in the region are also concentrated in the Northeastern and Southeastern portions of Omaha; the West End, South End and Mid-City areas in Council Bluffs; and the most northern census tracts of Bellevue. As noted in the Demographics section above, the LEP population has been increasing since 1990 across the region and in these jurisdictions at a rate of an almost 100% increase from decade to decade since 1990.

**Figure V-5 Regional LEP Population**
In Omaha, the majority of Spanish-speaking residents are located to the east of 72nd street in the north and along the southern border of the city to the east of 120th street. The largest population of Spanish-speakers and most concentrated areas of the LEP population are in census tracts in the most southeastern corner of the city, to the east of 42nd street and south of Dodge street. For over a century the southeastern portion of Omaha has been known to house new immigrants coming to the area. In the late 1800’s and early 1900’s, opportunities for employment through Union Pacific Railroad and the stockyards of Omaha drew large populations of foreign-born residents from Europe and eventually Latin America. Ethnic enclaves were reflected in social and religious institutions in the area at the turn of the 20th century and can still be seen in architecture, art, food, and music today.

The most southern R/ECAP has over 30% of persons in the LEP population. Of these, over 25% were identified as Spanish-speaking, and just over 3.5% as speaking African languages. This census tract also has one of the largest public housing complexes, additional scattered site housing, project-based section 8 housing, and low income housing tax credit projects which house many refugee and new immigrant families. Public housing and other forms of affordable housing to the north of Interstate 80 and east of Interstate 480, may also contribute to the presence of LEP communities comprised of Spanish, Asian, and African languages in the southeast portion of the city.
In North Omaha census tracts have a more diverse population within the LEP communities. In addition to the presence of Spanish-speakers, there are more residents who speak African and “other” Asian languages in LEP communities living in R/ECAPs and other census tracts to the north of Dodge street. This trend is most likely capturing the large population of refugees who have come more recently to Omaha, and tend to reside in areas with more publicly supported and affordable housing options.

Figure V-6 Percentage of Non-White Households in Omaha and Council Bluffs

Source: 2014 ACS Census Data

In order to identify more definite boundaries of segregation, the map above was created, which displays the percentage of Non-White households by census tract. The census tracts showing 40%-50% and 50%-60% indicate the most integrated areas of the city. Overall, the most integrated areas of Omaha are in the Northwest, Midtown, Downtown and some areas in the Southeast. Highly segregated areas included those to
the far West, which are more than 90% White, and those in the Northeast and far Southeast Omaha which have 90% or more residents identifying as Non-White.

COUNCIL BLUFFS

Figure V-7 Council Bluffs Demographics Race/Ethnicity

As the largest city in Southwest Iowa, Council Bluffs has significantly more diversity than the other 13 cities within Pottawattamie County. The 2010 Census found seven areas of concentration of minority residents. Census tracts 305.02, 306.02, 307, 308, 309, 313 and 314 are areas of concentration of Hispanic residents. There were no additional areas of concentration for any single minority group in 2010. These census tracts are located in the central and western portions (West-End, South-End and Mid-City neighborhoods) of the City and contain higher concentrations of residents living in poverty or who are low-to-moderate income.

Figure V-8 Council Bluffs Non-White Demographics
Source: HUD Map 1 Race/Ethnicity, Dot Density 1:20 White, Non-Hispanic Population Removed

Figure V-9 Carter Lake Non-White Demographics
Carter Lake, Iowa is located on the west side of the Missouri River and is landlocked by the City of Omaha. The city of 3,785 has the highest racial and ethnic diversity by percentage in Pottawattamie County with only 90.3% identifying as White. The City’s Hispanic population makes up 11.5% of the total population. Additionally, 5.8% of residents identify as two or more races and 1.0% identify as Black. The median home value in Carter Lake is $98,000, which is significantly less than the City of Council Bluffs at $111,900. Children in Carter Lake attend school within the Council Bluffs Public School District.

In Council Bluffs, The number one country of national origin outside of the United States in is Mexico with 2.57% of the population originating from the country. Other countries of origin are El Salvador (0.46%), Vietnam (0.18%), Korea (0.12%), India (0.11%),
Bosnia and Herzegovina (0.10%), Ukraine (0.10%), England (0.09%), Philippines (0.08%), and Turkey (0.07%).

For the region, Mexico is still the number one country of national origin outside of the United States with 3.06%. Other countries of origin include India (0.42%), El Salvador (0.28%), Vietnam (0.25%), Guatemala (0.21%), China excluding Hong Kong and Taiwan (0.18%), Korea (0.17%), Thailand (0.16%), Philippines (0.16%), and Burma (0.13%).

The number one limited English proficiency (LEP) language in Council Bluffs is Spanish with 2.99%. Other LEP languages spoken in the City include Other Slavic (0.11%), Vietnamese (0.08%), Serbo-Croatian (0.05%), Korean (0.03%), Portuguese (0.03%), Tagalog (0.03%), French (0.02%), and German (0.02%).

For the region, Spanish is the number one LEP language with 3.42%. Other LEP languages spoken in the region include Other Asian (0.24%), African (0.19%), Vietnamese (0.18%), Chinese (0.14), French (0.13%), Other Indic (0.11%), Arabic (0.08%), Other Unspecified (0.05%), and Korean (0.04%).

The differences between Council Bluffs and the region are primarily due to size. The Omaha-Council Bluffs Metropolitan area includes several cultural pockets in Omaha that do not exist in Council Bluffs. For this reason, the diversity levels are less pronounced in the City whereas they may be more prevalent in the metro as a whole.
To identify areas with relatively high segregation and integration by race and ethnicity, the AFFH Maps 1, 3, and 4 were utilized to identify ethnicity and race, national origin, and LEP population in the Bellevue city limits and surrounding area.

**Figure V-10 Bellevue Demographics**

Source: HUD Map 1 Race/Ethnicity, Bellevue

**Figure V-11 Bellevue Demographics Race/Ethnicity**
HUD AFFH Map 1 demonstrates that Bellevue has diversity in most census tracts. The eastern area of Bellevue is the least integrated and also the oldest area, including districts such as Olde Towne Bellevue. More Hispanic residents live in the north central and north east areas of Bellevue than the other areas. The area north of Bellevue city limits has significantly higher concentration of Hispanic households than areas within Bellevue city limits. The Hispanic population in the northern area of Bellevue could be relocating to this specific location to remain close to support systems, family and networks which are notably located in the south area of Omaha (as indicated by Figure V-11). The area just north of Harrison Street is also an industrial job center with many employment opportunities. Harrison Street is a dividing line between Douglas County and Sarpy County which not only separates jurisdictions, but also a number of social services.
The percentage of the population in Bellevue that is designated as having Limited English Proficiency (LEP) is 4.77% which is an increase from 2000 when it was 2.77%, but only a slight decrease from 2010 when it was 4.92%. Most LEP households in Bellevue are Spanish-speakers at 4%, followed by residents who speak African languages at a significantly lower percentage of .36%. HUD AFFH Map 4 shows a slight concentration of LEP households is in Central, North Central and Northwest Bellevue. As with racial and ethnic groups, the majority of Spanish-speaking LEP households are located in north central and central Bellevue.

This can also be seen been when reviewing national origin presented in HUD AFFH Map 3. Those with national origins of Mexico and El Salvador can be found mostly in in north central and central Bellevue.
Figure V-13 Bellevue National Origin

Source: HUD Map 3 National Origin; Dot Density 1:20
c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Figure V-7 Regional Demographic Trends

<table>
<thead>
<tr>
<th>Racial/Ethnicity</th>
<th>NE-IA Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1990</td>
</tr>
<tr>
<td>White</td>
<td>608,068</td>
</tr>
<tr>
<td>Black</td>
<td>50,830</td>
</tr>
<tr>
<td>Hispanic</td>
<td>16,664</td>
</tr>
<tr>
<td>Asian or pacific Islander</td>
<td>6,138</td>
</tr>
<tr>
<td>Native American</td>
<td>2,978</td>
</tr>
</tbody>
</table>

Source: HUD Table 2 Demographic Trends

As mentioned in the Demographic Summary in Section A, changes in population according to Census Data from 1990 to 2010 show that the Omaha-Council Bluffs Region is experience growth. Hispanic households are the fastest growing population in the region.
The HUD maps below indicates that the majority of minority residents from the region are living in Omaha, Council Bluffs, and Bellevue, but disproportionately in Omaha. Many Black households and Latino households are located within R/ECAPS. In 1990 all twelve R/ECAPs are located in North Omaha.
The variety of HUD maps regarding Race/Ethnicity Trends provides a visual display of census data of demographics for the region in 1990, 2010, and 2010. The data indicates that the concentration of minority residents in North Omaha in 1990 between 2010 increased and also became more diverse. Census tracts that were primarily Black in 1990 saw an increase in Hispanic and Asian/Pacific Islander households by 2010. Additionally there is a trend of Black residents occupying a larger area into Northwest Omaha and the Midtown areas.
HUD Map 2 displays the change in regional demographics in 2010. An increase overall in the total amount of Non-White residents can be seen in Omaha, Council Bluffs, and Bellevue. A majority of this increase can be seen in Southeast Omaha.

Within the Omaha jurisdiction, Black households have moved north and west, while Hispanic households have increased in the south. In 2010, there were eleven R/ECAPs, including 10 in North Omaha and one in South Omaha. Simultaneously, White residents...
moved further west and southwest. The City of Omaha’s westward expansion and development in the western portions of Sarpy County added to this trend.

**Figure V-17 Regional Demographics 2010**

The visible increase in the number of Hispanic residents and movement of the Black population further north and west continued in 2010. The number of R/ECAPs increased to 12, although the census tracts with this designation shifted. The density of White residents in the west and south also continued. Omaha’s annexation of Elkhorn in 2007 may be a factor in the development of even more neighborhoods and businesses in the far western portion of Omaha.

Omaha’s population quadrupled between 1990 and 2010. The increase in population was prominent in South Omaha and Southwestern areas of Omaha. Asian Pacific/Islanders made up less than 1% of Omaha’s population in 1990 and were distributed throughout the city but with slightly higher concentrations in North Omaha.
This population tripled by 2010 with the majority of Asian/Pacific Islander households located in Midtown, census tracts along the southern border of the city along Harrison Street, and in the west along 168th street.

COUNCIL BLUFFS

Figure V-18 Council Bluffs Demographic Trends 1990

Since 1990, the City has shown steady percentages for all ethnicities with the exception of those identifying as Hispanic. In 1990, 1,313 residents (2.4%) identified as Hispanic/Latino. In 2000, 2,594 (4.5%) of the population identified as Hispanic/Latino population. This trend shows each decade, the City doubles its previous decade’s Hispanic/Latino population. Though this is still a small percentage of the total population, it is something the City will need to plan for in the future. There are minor
clusters of Hispanic households located in the West End and South Ends of the City including US Census Tracts 305.02, 306.02, 307, 308, 309, 313 and 314. The change overtime is the increase in the number of Hispanic households though no specific trends in segregation exist.

**Figure V-19 Council Bluffs Demographic Trends 2010**

Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed
BELLEVUE

Table V-8 Dissimilarity Trends Bellevue

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td>15.94</td>
<td>15.33</td>
<td>13.94</td>
<td>20.05</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>11.55</td>
<td>18.61</td>
<td>24.35</td>
<td>28.32</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>25.05</td>
<td>19.61</td>
<td>14.19</td>
<td>24.87</td>
</tr>
</tbody>
</table>

Note 1: Data Sources: Decennial Census

Source: HUD Table 3 Racial/Ethnic Dissimilarity Trends

Over time, the segregation level in Bellevue has fluctuated, but not significantly. As shown above in the HUD AFFH Table 3, Bellevue’s segregation for all races has remained in the low category which is likely a result of non-white populations being dispersed evenly throughout the jurisdiction. HUD Map 2 shows data for years 1990, 2000 and 2010. These maps indicate that the race and ethnicity of Bellevue has been similar over a 20 year period. This reiterates the information provided by Table 3.
Figure V-20 Bellevue Demographics 1990

Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed
Figure V-21 Bellevue Demographics 2000

Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed
Figure V-22 Bellevue Demographics 2010

Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed
d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Table V-9 Rental and Home Ownership Rates

<table>
<thead>
<tr>
<th></th>
<th>Percentage of households</th>
<th>Percentage of households</th>
<th>Percentage of households</th>
<th>Percentage of households</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Region</td>
<td>Omaha</td>
<td>Council Bluffs</td>
<td>Bellevue</td>
</tr>
<tr>
<td>Own</td>
<td>Rent</td>
<td>Own</td>
<td>Rent</td>
<td>Own</td>
</tr>
<tr>
<td>Total % Household Units</td>
<td>73%</td>
<td>27%</td>
<td>59%</td>
<td>41%</td>
</tr>
<tr>
<td>Total # Household Units</td>
<td>224,970</td>
<td>112,190</td>
<td>97,745</td>
<td>67,375</td>
</tr>
</tbody>
</table>

Source: HUD Table 16 Homeownership and Rental Rates

According to **HUD Table 16 Homeownership and Rental Rates**, there are just over 335,000 households in the region, and the number of households owning their home is over double the number of those who rent. According to 1990 Census Data collected through Social Explorer, the region has experienced a gain in the total number of households over the last two decades and an overall increase in home ownership. In 1990, there were a total of 257,279 households in the eight county region, with 34% of the households renting and 64% of households recorded as owning their homes. Data above from HUD’s Comprehensive Housing Affordability Strategy (CHAS) data provided in HUD Table 16 shows the total number of households for the Region as 337,160, with 27% of households renting and the 73% of the region’s households owning their home.

All jurisdictions have a lower homeownership rate than the region, but Omaha has the lowest among the three cities. In both Council Bluffs and Bellevue, home ownership is double the amount of those households renting, matching the regional trend. Home ownership for White, Non-Hispanic households is much higher in all jurisdictions than any other category of race/ethnicity.
In Omaha, home ownership is higher to the west of 42nd street. More than half of the census tracts to the east of 42nd are composed of rental properties, with a majority of the census tracts having less than 20% ownership rates. The highest rate of homeownership in the city is concentrated west of 120th street where all census tract rates are all 60% or higher and the majority over 70%.

In addition to having the highest amount of rental properties, the neighborhoods east of 42nd Street also have the highest percentage of affordable rental units. According to HUD Map 17 which shows the location of rental units affordable to 50% of the average median income, affordable units are concentrated in northeast and southeast Omaha.
Areas to the east of 42nd also house the largest percentage of Non-White residents in the Omaha area. The concentration of protected classes paired with low rates of homeownership and the high percentage of affordable rental units, all located east of 42nd Street, indicates that there are factors contributing to the segregation in the jurisdiction. Based on local data and community input these factors include:

- Lack of affordable housing for families at 50% average median income (AMI) or lower (see “Access to Low Poverty Neighborhoods ”)
- Lack of incentives for developers to produce affordable housing
- Barriers to infill development (high construction/rehab costs and current stormwater regulations)
- Community opposition to low-income and mixed income development

This inequity includes the quality of housing available for residents living in the area. According to HUD Community Planning and Development (CPD) maps below, the rental housing east of 42nd Street is also older the rental housing stock in other areas of Omaha. A majority of the census tracts in northeastern and southeastern Omaha have 50% or more of the rental housing units built prior to 1949.

Source: HUD AFFH Map 17 Location of Affordable Rental Housing, Omaha Council Bluffs Consortium
As the City of Omaha has grown west, newer units were constructed. Census tracts in the far western portion of the city have the highest rates of home ownership, lowest rates of rental housing, lowest density of affordable units, and least amount of publicly supported housing. Western Omaha neighborhoods are also the most homogenous, with the largest percentage of white residents per census tract.
When comparing homeownership and rental rates based on race/ethnicity, there are significant differences between White and non-White households. The table below compares homeownership and rental rates from 2010 Census data based on race and ethnicity.

**Table V-10 Regional and Jurisdictional Homeownership and Rental Rates**

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Own Region</th>
<th>Rent Region</th>
<th>Own Omaha</th>
<th>Rent Omaha</th>
<th>Own Council Bluffs</th>
<th>Rent Council Bluffs</th>
<th>Own Bellevue</th>
<th>Rent Bellevue</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>89.13%</td>
<td>71.05%</td>
<td>83.99%</td>
<td>62.02%</td>
<td>93.59%</td>
<td>86.8%</td>
<td>83.64%</td>
<td>73.54%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>4.14%</td>
<td>14.54%</td>
<td>7.27%</td>
<td>20.71%</td>
<td>0.51%</td>
<td>2.26%</td>
<td>5.04%</td>
<td>10.00%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4.26%</td>
<td>9.00%</td>
<td>6.19%</td>
<td>10.51%</td>
<td>4.59%</td>
<td>8.08%</td>
<td>8.39%</td>
<td>11.34%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>1.25%</td>
<td>2.71%</td>
<td>1.18%</td>
<td>3.60%</td>
<td>0.34%</td>
<td>0.73%</td>
<td>1.09%</td>
<td>2.44%</td>
</tr>
<tr>
<td>Native American</td>
<td>0.21%</td>
<td>0.54%</td>
<td>0.27%</td>
<td>0.66%</td>
<td>0.13%</td>
<td>0.23%</td>
<td>0.08%</td>
<td>1.10%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>0.99%</td>
<td>2.17%</td>
<td>1.11%</td>
<td>2.49%</td>
<td>0.83%</td>
<td>2.37%</td>
<td>1.81%</td>
<td>1.57%</td>
</tr>
<tr>
<td>Total % Household Units</td>
<td>73%</td>
<td>27%</td>
<td>59%</td>
<td>41%</td>
<td>64%</td>
<td>36%</td>
<td>68%</td>
<td>32%</td>
</tr>
<tr>
<td>Total # Household Units</td>
<td>224,970</td>
<td>112,190</td>
<td>97,745</td>
<td>67,375</td>
<td>15,675</td>
<td>8,845</td>
<td>13,295</td>
<td>6,350</td>
</tr>
</tbody>
</table>

*Source: HUD  Table 16: Homeownership and Rental Rates by Race/Ethnicity*

Across the region and in each jurisdiction, White households are the only demographic with a higher percentage of homeowners than renters. All other races and/or ethnic groups have at least double the amount of households renting rather than owning their homes.
According to Map 17, the most affordable areas in Council Bluffs are the West End and the Mid-City areas. The percent of affordable rental units in these areas range from 64.56% to 78%.

Single-family rental units are typically located throughout the Council Bluffs jurisdiction with concentrations in Mid-City, the west end, south end and Manawa areas. The number of affordable rental units in the east end is significantly less than other areas of the city.

Owner-occupied units are available throughout the city with the highest ratios of owner-occupied units in the east end of the City. These neighborhoods include older established areas as well as new construction, and high-end subdivisions.

Multi-family apartment complexes are also spread throughout the city with one concentration in the west end, specifically Census Tracts 303 and 304.

In past years, multi-family development tended to be concentrated in areas of lower income; however, this has changed in recent years. In the last 15 years, the City’s
Community Development Department has worked to diversify available affordable multi-family housing to other portions of the city including the following developments:

- Kirn Gym, Harvest Artist Lofts and Prime Square developments in the historic center
- Gunn School and Indian Creek Apartments located in the east end on North Broadway
- Dillman Place, Copper Creek, Sherwood Place, The Rose of Council Bluffs and Kanesville Heights located on the east side

Additionally, the City is working with a development firm to construct an affordable senior housing complex in the west end as part of the first phase of new housing adjacent to the West Broadway Corridor. To the east, the City is working with three separate projects to bring additional senior housing:

- Immanuel Pathways: 56 units consisting of one and two-bedroom
- Agemark Senior Living: memory care facility to serve 36 Alzheimer’s and other dementia-related conditions
- Presbyterian Homes and Assisted Living, Inc.: 36 independent living apartments, 24 assisted living apartments, 18 memory care units and 72 care center beds (150 total beds)
Figure V-30 Bellevue Percentage of Rental Households by Census Tract

Source: HUD Map 16 Housing Tenure; Percentage Who Are Renters

As shown in HUD Map 16 for Housing Tenure, Bellevue's highest rates of renter occupied units is located on Offutt Air Force Base and in military housing which is located on federally owned property. Both areas have the highest percentage of households that are renters at greater than 72%. Other concentrations of renter occupied units are located in southern Bellevue. The neighborhoods in southeast Bellevue include the older neighborhoods that contain smaller, affordable units. Highway 370 runs east/west through south central area of Bellevue. Many multi-family developments are located along the transportation corridor which leads to high rates of renter occupied units.
Greater rates of owner occupied units are located in newer development areas. These areas are concentrated in western and southwestern Bellevue.

Bellevue’s development began along the Missouri River in the eastern part of the community. As growth continued, new development continued west along north Bellevue closer to Omaha before expanding west and southwest where most recent housing developments are located.

The older neighborhoods which are located in the eastern areas of Bellevue along the river continue to contain more renter occupied housing units. These areas are also the more affordable housing units due to size of units and age.

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

OMAHA

It is likely that the continual concentration of affordable housing in northeast and southeast Omaha has contributed to segregation in the region. HUD Map 5, Publicly Supported Housing and Race/Ethnicity, demonstrates there is also a concentration of Section 8 voucher units, multi-family, and low-income housing tax credit properties in the areas of Omaha east of 72nd street. Omaha has had a history of NIMBYism or "Not In My Backyard" mentality from neighborhoods and Homeowner Associations to the west of 72nd when affordable and publicly supported housing projects have been proposed. This community opposition is a contributing factor to segregation in the Omaha area.

Figure V-32 Omaha Publicly Supported Housing and Race/Ethnicity

The City of Omaha Code of Ordinances provides incentives for developers who incorporate affordable housing (Chapter 55, Article 10, Section 55-785). However, developers wishing to include affordable housing have to apply for a conditional use permit (Chapter 55, Article 10, Section 55-882). This application process includes the
requirement of the developer to “meet with and receive input from each interested party” (Chapter 55, Article 10, Section 55-883). Interested parties are listed as those with properties near or adjacent to the potential development, including neighborhood associations. In theory, making sure developers discuss land use and projects with stakeholders and residents in the area is important to allowing established businesses and residents have a say in what happens in their community. Unfortunately, it can also provide a platform for stigma associated with “affordable housing” to prevent the creation of affordable housing and more mixed income neighborhoods.

As housing prices continue to rise in the Omaha area, multiple neighborhood and community advocacy groups are discussing the need for affordable housing and concern with displacement. Many residents voiced strong support for more affordable housing during the public engagement process for the fair housing assessment. Residents requested that housing be distributed more equally throughout the city and located near transportation to increase connectivity in the region and access to amenities and opportunities.

Another current practice that contributes to lack of affordable housing and segregation in Nebraska are policies associated with Sanitary and Improvement District (SIDs). Dr. Palma Strand, Professor of Law at Omaha’s Creighton School of Law has studied the inequity created by Omaha’s SID policies in depth. Strand (2017) reports that lack of affordable housing in west Omaha is being greatly impacted by current structure of state statutes and annexation process associated with SIDs.

SIDs are taxing districts created by developers to help fund the completion of amenities and services to new housing communities. Residents agree to pay a higher tax to help fund the infrastructure necessary to support the newly built area where they live. In turn the developers receive benefits through different avenues of government financing. They were created in late 1940’s as a way to help cities provide adequate services to growing suburbs (Strand, 2017).

Because SIDs rely on developers making a profit, they are more likely to construct higher end and market-rate only housing in order to minimize their risks. According to Dr. Strand, “Mixed-income and multi-family developments that would provide housing affordable by households of more modest means, as well as mixed-use developments, are perceived as riskier investments; therefore, they are not constructed (2017).” Although SIDs may be responsible for streets, sewers and power, and can also buy land for public parks, developers are not held to the same requirements as cities when providing these services. Without the same federal requirements, such as the mandate to affirmatively further fair housing, developers can avoid adhering to regulations that include protected classes in the design of cities. The lack of regulation frees developers
from the duty to provide affordable housing. According to Dr. Strand, the SIDs are currently providing almost exclusively market-rate housing to a majority of White residents (2017).

Another example is the exemption of these SIDs from complying with the Americans with Disabilities Act (ADA). With no requirement to create complete streets or accessible sidewalks in the construction of their neighborhoods, these SIDs limit access for persons with disabilities. If the City of Omaha annexes these SIDs, these areas remain unaffordable to residents at the average median income and inaccessible for many residents with mobility impairments.

COUNCIL BLUFFS

Although Iowa is located in the heart of Middle America, it has always been more progressive than most of the states in the Union. Examples include:

- 1846: Iowa demonstrated its acceptance of religious minorities by allowing safe passage of the Mormons through western Iowa who were fleeing religious persecution in Illinois.
- 1868: Iowa became the second state to outlaw segregated schools… ninety years before the rest of America. The Iowa State Supreme Court ruled, in the case brought before it by Alexander Clark of Muscatine, that all children in Iowa must attend the same schools.
- 1873: The Iowa State Supreme Court ruled that African Americans are entitled to equal treatment in public accommodation.
- 1884: The Iowa Civil Rights Act was passed. It prohibited discrimination in public accommodation. It was one of the first civil rights acts in the nation.
- 2005: On June 17th, the Iowa State Supreme Court, in Alons v Iowa District Court, ruled that a same-sex couple who had been legally joined in another state could be divorced under Iowa law.
- 2008: The Council Bluffs City Council banned discrimination in Council Bluffs due to sexual orientation AND gender identity.
- 2009: On April 3rd the Iowa State Supreme Court handed down a unanimous decision in Varnum v Brien in favor of full marriage equality for gays and lesbians. Due to the stay on the 2007 district court ruling, this made Iowa officially the third state to allow marriage equality.

Specific to Council Bluffs, members of protected classes are represented on City boards and commissions dealing with housing issues. Currently, all City and MHA boards are
gender balanced with some minority and disabled representation but this could be expanded to include protected populations.

- Community Development Advisory Committee (CDAC): gender balanced
- Civil Rights Commission (CRC): gender balanced with two racial minorities and two LGBTQ+ members
- Planning Commission: gender balanced
- Zoning Board of Adjustment: gender balanced with one racial minority
- Historic Preservation: gender balanced

**BELLEVUE**

While Bellevue grew substantially between 1990 and 2010, the breakdown of the population between residents of different races and/or ethnicities remain relatively the same. The Hispanic population grew substantially more than any of the other minority group. Segregation has remained in the low category, but if it continues along the same growth rate it will become moderately segregated. Specifically, this is impacting the Hispanic population settling in northern Bellevue closer to the south Omaha neighborhoods.

2. Additional Information

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

**OMAHA**

Based on community and stakeholder feedback regarding the LEP community, specifically refugees and new immigrants, they are also experiencing segregation. HUD data from the 2010 Census doesn't reflect the current numbers and locations of refugees that have settled in the region. According to the US Department of State: Bureau of Population, Refugees and Migrations’ Office of Admissions, between 2011 and 2017, at least 2,505 refugees from 20 different countries have settled in Omaha. A majority of these refugees live in Northeast and Southeast Omaha. See Attachment G.

The table below was created based on data provided by the Omaha Multicultural Welcoming Alliance.
Table V-11 Omaha Refugee Communities

<table>
<thead>
<tr>
<th>Refugee Community</th>
<th>Nation of Origin</th>
<th>Primary Language(s) Spoken</th>
<th>General Area of Residence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bhutanese</td>
<td>Bhutan and Nepal</td>
<td>Nepali</td>
<td>Midtown including: Saddlecreek to Benson, and along the Dodge Street Corridor (East and West of 42nd and Dodge), to the North in neighborhoods of Walnut Hill, Gifford Park, Joslyn Castle</td>
</tr>
<tr>
<td>Karen and Karenni</td>
<td>Myanmar (Burma)</td>
<td>Karenic languages, Kayah and/or Tibeto-B Burman languages</td>
<td>Prospect Village, Benson,Bemis Park, Gifford Park</td>
</tr>
<tr>
<td>Chin</td>
<td>Myanmar (Burma)</td>
<td>Chin languages, Burmese, and Tibeto-B Burman languages</td>
<td>Prospect Village, Benson,Bemis Park, Gifford Park</td>
</tr>
<tr>
<td>Somali</td>
<td>Somalia</td>
<td>Somali and Arabic</td>
<td>Scattered throughout Northeast Omaha, in South Omaha Southside Terrace/Indian Hills South area</td>
</tr>
<tr>
<td>Sudanese and South Sudanese</td>
<td>Sudan</td>
<td>Arabic and Nuer</td>
<td>Scattered throughout Northeast Omaha, Papillion, and Bellevue</td>
</tr>
<tr>
<td>Iraqi</td>
<td>Iraq</td>
<td>Arabic</td>
<td>Millard</td>
</tr>
<tr>
<td>Syrian</td>
<td>Syria</td>
<td>Arabic</td>
<td>Scattered throughout West Omaha and Northeast Omaha</td>
</tr>
</tbody>
</table>

Source: Ann Marie Kudlac, Omaha Multicultural Welcoming Alliance

As a part of the fair housing assessment, City of Omaha Human Rights and Relations and Planning staff met with refugee and new immigrant families through a partnership with Lutheran Family Services. In order to gain a better understanding of the challenges of refugee and new immigrant families, City of Omaha employees met with 30 individuals who have recently arrived in Omaha from across the world. Through the assistance of an interpreter, City staff asked a series of eight questions related to housing, employment, transportation, and potential experiences of discrimination. See Attachment E. According to the experiences of these individuals, challenges for new immigrant and refugee families include the following:

- Affordability
- Size of affordable units (needing housing for larger families)
Experiences of discrimination in both housing and employment

Many refugee families are placed in areas in Omaha within census tracts currently identified as R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty—see section ii for R/ECAP maps). Federal law only allows for 90 days of resettlement orientation and support in finding housing, jobs, transportation, and learning the language; after which time new arrivals are on their own. Placing new arrivals together helps them acclimate better as it gives people a sense of community and a support network of friends and extended family. Many refugee families later purchase or rent homes near each other in census tracts in or to the west of the R/ECAP areas once they are able to move out of the apartments.

The majority of refugee families are being settled in areas already burdened by housing and environmental issues, as well as access to proficient schools, employment, and transportation (see Disparities in Access to Opportunity). Although the location of the refugee families is concentrated to areas of the city that are already highly segregated, some of the refugee families surveyed did not perceive this segregation/discrimination. Many stated that they believed learning English would help them overcome the barriers they have experienced in accessing opportunities.

COUNCIL BLUFFS

Local data gathered during the outreach process discussed segregation in Council Bluffs and included a discussion of why the City does not have a larger number of Black/African Americans as compared to Omaha. With the proximity to the R/ECAP areas in North Omaha, observers would presume Council Bluffs would have a higher concentration of this population. Stakeholders stated they believed African Americans choose not to live in Council Bluffs not because of racial tension but so they can be closer and surrounded by a similar population. There is still a perceived segregation in Council Bluffs concerning racial and ethnic backgrounds but the extent is unknown, as the public process did not produce conclusive results.

Segregation is still an issue in the state. For example, Iowa has a relatively low incarceration rate at 282 per 100,000 adults, compared to the national average of 392 per 100,000 adults. However, the incarceration rate for Black Iowans was 11 times higher than for Whites – the fourth highest in 2014 according to The Sentencing Project; a Washington, D.C. based nonprofit (Attachment H).
HUD defines segregation as a high concentration of persons of a race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. The Table below demonstrates racial distribution by census tract.

When looking specifically at the table below, the highest percentage of minority population lives in north central Bellevue, in Census Tracts 101.08 and 101.07. This is followed by Census Tracts 103.06 and 103.05 which are in designated military base housing.

**Table V-12 Bellevue Demographics by Census Tract**

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>White</th>
<th>Black/African Amer.</th>
<th>Amer. Indian/Alaska Native</th>
<th>Asian</th>
<th>Native Hawaiian/Other Pacific Islander</th>
<th>Some Other Race</th>
<th>Two or more Races</th>
<th>Census Tract Total</th>
<th>Minority Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>101.03</td>
<td>3,920</td>
<td>169</td>
<td>20</td>
<td>72</td>
<td>0</td>
<td>54</td>
<td>119</td>
<td>4,354</td>
<td>10.0%</td>
</tr>
<tr>
<td>101.04</td>
<td>1,489</td>
<td>91</td>
<td>10</td>
<td>36</td>
<td>7</td>
<td>98</td>
<td>70</td>
<td>1,801</td>
<td>17.3%</td>
</tr>
<tr>
<td>101.05</td>
<td>2,389</td>
<td>222</td>
<td>26</td>
<td>93</td>
<td>7</td>
<td>96</td>
<td>109</td>
<td>2,942</td>
<td>18.8%</td>
</tr>
<tr>
<td>101.06</td>
<td>3,319</td>
<td>263</td>
<td>28</td>
<td>80</td>
<td>32</td>
<td>152</td>
<td>171</td>
<td>4,045</td>
<td>18.0%</td>
</tr>
<tr>
<td>101.07</td>
<td>2,448</td>
<td>189</td>
<td>27</td>
<td>100</td>
<td>7</td>
<td>432</td>
<td>169</td>
<td>3,372</td>
<td>27.4%</td>
</tr>
<tr>
<td>101.08</td>
<td>2,435</td>
<td>503</td>
<td>19</td>
<td>118</td>
<td>8</td>
<td>296</td>
<td>221</td>
<td>3,600</td>
<td>32.3%</td>
</tr>
<tr>
<td>102.03</td>
<td>4,281</td>
<td>183</td>
<td>11</td>
<td>89</td>
<td>4</td>
<td>50</td>
<td>150</td>
<td>4,768</td>
<td>10.2%</td>
</tr>
<tr>
<td>102.04</td>
<td>2,763</td>
<td>348</td>
<td>18</td>
<td>92</td>
<td>9</td>
<td>106</td>
<td>145</td>
<td>3,481</td>
<td>20.6%</td>
</tr>
<tr>
<td>102.05</td>
<td>4,675</td>
<td>302</td>
<td>20</td>
<td>131</td>
<td>5</td>
<td>46</td>
<td>257</td>
<td>5,436</td>
<td>14.0%</td>
</tr>
<tr>
<td>Tract</td>
<td>Population</td>
<td>Houses</td>
<td>Median Income</td>
<td>Income</td>
<td>Median Age</td>
<td>Under 18</td>
<td>18-24</td>
<td>25-64</td>
<td>65+</td>
</tr>
<tr>
<td>--------</td>
<td>------------</td>
<td>--------</td>
<td>---------------</td>
<td>--------</td>
<td>------------</td>
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<td>-----</td>
</tr>
<tr>
<td>102.06</td>
<td>3,307</td>
<td>356</td>
<td>18</td>
<td>126</td>
<td>6</td>
<td>64</td>
<td>205</td>
<td>4,082</td>
<td>19.0%</td>
</tr>
<tr>
<td>102.07</td>
<td>2,026</td>
<td>135</td>
<td>7</td>
<td>71</td>
<td>4</td>
<td>37</td>
<td>81</td>
<td>2,361</td>
<td>14.2%</td>
</tr>
<tr>
<td>103.02</td>
<td>764</td>
<td>106</td>
<td>11</td>
<td>24</td>
<td>3</td>
<td>27</td>
<td>59</td>
<td>994</td>
<td>23.1%</td>
</tr>
<tr>
<td>103.05</td>
<td>1,318</td>
<td>181</td>
<td>11</td>
<td>26</td>
<td>14</td>
<td>58</td>
<td>170</td>
<td>1,778</td>
<td>25.9%</td>
</tr>
<tr>
<td>103.06</td>
<td>1,416</td>
<td>161</td>
<td>20</td>
<td>52</td>
<td>3</td>
<td>72</td>
<td>154</td>
<td>1,878</td>
<td>24.6%</td>
</tr>
<tr>
<td>104.01</td>
<td>2,098</td>
<td>206</td>
<td>22</td>
<td>122</td>
<td>0</td>
<td>137</td>
<td>107</td>
<td>2,692</td>
<td>22.1%</td>
</tr>
<tr>
<td>104.02</td>
<td>3,535</td>
<td>165</td>
<td>62</td>
<td>103</td>
<td>5</td>
<td>123</td>
<td>192</td>
<td>4,185</td>
<td>15.5%</td>
</tr>
<tr>
<td>105.01</td>
<td>5,205</td>
<td>351</td>
<td>48</td>
<td>176</td>
<td>3</td>
<td>684</td>
<td>257</td>
<td>6,724</td>
<td>22.6%</td>
</tr>
<tr>
<td>105.02</td>
<td>3,654</td>
<td>95</td>
<td>30</td>
<td>45</td>
<td>4</td>
<td>345</td>
<td>114</td>
<td>4,287</td>
<td>14.8%</td>
</tr>
<tr>
<td>105.03</td>
<td>2,955</td>
<td>66</td>
<td>17</td>
<td>53</td>
<td>5</td>
<td>223</td>
<td>85</td>
<td>3,404</td>
<td>13.2%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2010 Census Data by Census Tract
b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.

**OMAHA**

The map below indicates that current segregation has been impacted by former practices of institutional racism including redlining and blockbusting.

**Figure V-33 R/ECAPS Omaha Jurisdiction 2016 Combined with 1935 HOLC Redlining Data**

Areas once defined as “definitely declining” and “hazardous” are home to many of the current R/ECAP designations. Although the Fair Housing Act of 1968 was created to reverse the effects of these practices, it was followed by a period of social unrest and poor development practices including:
• White flight and the movement of employers out of North Omaha and to the western portions of the city following the Fair Housing Act of 1968
• Race riots of the 1960’s and 1970’s
• High levels of unemployment and increasing cost of transportation due to the location of employers
• Construction of the North Freeway in the 1970’s dividing neighborhoods and removing housing stock
• Closing of 16th Street in 1970 closing off North Omaha from the downtown Omaha business district
• Loss of density for homes and businesses due to disrepair and demolition
• Lack of private and public investment to revitalize these neighborhoods until recent years

3. Contributing Factors of Segregation

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

OMAHA

Community opposition: Cultural attitudes regarding ability, race and poverty are barriers to integration. Historic segregation laws, policies, and investment practices affected the location of minorities in the Omaha area. As those laws and policies were repealed or modified, community opposition to integrated communities limited housing options for many minority households.

Lack of private investments: Private investment in Northeast and Southeast Omaha has been low compared to the investment in Western Omaha. There has also been a lack of a unified community revitalization strategy between the City, non-profit organizations, developers, and the philanthropic community. This trend appears to be changing with more recent collaborative efforts from community stakeholders focused on development and supportive programing in targeted neighborhoods in Eastern Omaha.

Loss of Affordable Housing: Lack of resources and funding mechanisms to rehabilitate aging homes particularly in Northeast Omaha has led to condemnations and demolition of many homes. Additionally, efforts to revitalize downtown Omaha has improved the quality of housing but increased the price of many units displacing persons depending on affordable housing and making relocation in downtown unaffordable for many low to moderate income households difficult.
Location and type of affordable housing: The location of affordable housing in Omaha has contributed to segregation. The vast majority of affordable housing is located in the eastern half of the City and more specifically, east of 72nd Street. Many families that need affordable housing, need larger units that either aren’t available or aren’t affordable.

Lending discrimination: Redlining practices helped to shape original patterns of segregation. Current complaints of discrimination (see fair housing enforcement) based on race/ethnicity show there are still barriers to lending for minority households. Locations of payday lenders in minority majority communities.

Source of income discrimination: Lack of landlords willing to accept Housing Choice Vouchers in high opportunity areas also contribute to segregation.

Private discrimination: Results from the Regional Fair Housing Survey indicated that many minority residents feel unwelcome and unwanted in the western portion of the City, where neighborhoods are nearly all White. Conversely, some survey respondents who identified as White also said they did not feel welcome in majority minority neighborhoods. The survey revealed that the perception of racism and discrimination that likely contributes to the segregation of the City.

COUNCIL BLUFFS

Contributing factors to segregation in Council Bluffs include:
1. Cultural attitudes regarding race and poverty
2. Access to publicly supported housing for persons with disabilities
3. Lack of assistance for transitioning from institutional settings to integrated housing

BELLEVUE

Community opposition: Bellevue faces what many communities face regarding alleged community opposition to minorities and development of additional public housing units. With limited citable instances and lack of supporting data, this community opposition appears to be perceived by surrounding communities and could be addressed with education and outreach.

With limited open land available for growth and focus more on economic development, the creation of additional public housing and affordable housing units lack support. In 2015, the Bellevue Housing Authority completed construction of two new duplex for
affordable housing. This project did not receive any community opposition. During public input sessions, those that live outside of the jurisdiction felt there was a perceived targeting of minority individuals by law enforcement.

Since the data does not show specific areas of segregation in the community, the City needs to work to provide outreach to minority populations and create a positive perception of the community to outsiders. This could include working with realtors and financial institutions to assist with outreach and programs to focus and invite minorities households to Bellevue.

Land use and zoning laws: The City of Bellevue Planning Commission reviews all zoning ordinances and land development proposals for consistency with the city comprehensive plan and can make recommendations to the City Council regarding requested changes to these ordinances. This can create situations in which municipalities have institutional barriers to affordable housing, such as minimum lot sizes and setbacks, that limit density. With available land becoming limited and Bellevue becoming landlocked by surrounding communities and natural barriers, future development of affordable housing will become more challenging with the political environment supporting more economic development.

Introduction

Regional Versus Jurisdiction Analysis
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (e.g., Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha  
Council Bluffs  
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA  
Douglas County Housing Authority- DCHA  
Council Bluffs Municipal Housing Agency- MHA  
Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair
housing analysis. All tables and data can be accessed online at: 
https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
<table>
<thead>
<tr>
<th>Demographics 2010</th>
<th>National Origin [Jurisdiction] (Top 5 most populous)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Dot = 75</td>
<td>1 Dot = 25 People</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>Mexico</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>India</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>El Salvador</td>
</tr>
<tr>
<td>Asian/Pacific Islander, Non-Hispanic</td>
<td>Guatemala</td>
</tr>
<tr>
<td>Hispanic</td>
<td>Thailand</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td></td>
</tr>
<tr>
<td>Multi-racial, Non-Hispanic</td>
<td></td>
</tr>
</tbody>
</table>
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

21. **Downtown**: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
22. **Mid-City**: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
23. **Bluff-Willow**: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
24. **Kanesville-Tinley**: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
25. **North End**: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
26. **West End**: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
27. **South End**: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
28. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
29. Lake Manawa: subdivisions east of Lake Manawa
30. East End: newer area to the east of Bluff-Willow and the North End to the city limits

BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

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

1. Analysis
Omaha

The City of Omaha is the only jurisdiction with the region that currently has R/ECAPs.

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

The U.S. Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the Non-White population comprises 50 percent or more of the total population and (2), the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Figure V-34 Current R/ECAP and Demographics Omaha

Source: HUD  Map 1 Race/Ethnicity

OMAHA

R/ECAPs within the Omaha Consortia based on 2010 Census data include census tract 24 in south Omaha and a large cluster of census tracts in northeast Omaha comprised of census tracts: 6, 7, 8, 11, 12, 40, 51, 59.01, 59.02, 60, and 61.01. All of the R/ECAP areas are concentrated in older sections of Omaha, with much of the housing stock dating to the late 19th and early 20th centuries.
• The large swath of R/ECAPs in north Omaha is primarily composed of Black, non-Hispanic populations while the R/ECAP for census tract 24 in south Omaha is predominantly Hispanic. Tract 24 includes the historic Vinton Street and Deer Park area which is an active neighborhood commercial and retail center. However, it is cut-off from the main south Omaha Hispanic and Latino cultural hub of South 24th Street by Interstate 80.

• Expansion by both Black and Hispanic populations can be seen in the map above into surrounding census tracts and beginning to emerge in tracts with predominantly White populations farther west along major corridors such as Interstate 80 in south central Omaha, Q Street in south Omaha, and the Interstate 680 - Sorensen Parkway area in northwest Omaha. However, the central area of Omaha and areas west of Interstate 680, as well as other census tracts within the consortium area jurisdiction and region continue to have little racial diversity.

• With the exceptions of census tracts 40 and 51, the R/ECAPs in north Omaha all have much smaller White and Hispanic populations than the R/ECAP in south Omaha. The difference these two tracts exhibit is due to their proximity to desirable areas. Tract 40 includes Midtown Crossing, an upscale residential, commercial and office area, and the Dodge and Leavenworth Street corridors. Census tract 51 is adjacent to Midtown Crossing and includes the historic residential areas of Bemis Park and Gifford Park. Many of the homes in the area have been restored and the area has active neighborhood associations. Both tracts 40 and 51 have seen a recent influx of condo and apartment development which is highly sought by people wanting to live in trendy neighborhoods close to downtown and near large employers and transportation along the Dodge Street corridor.

• The remaining R/ECAPs in north Omaha are predominantly Black. R/ECAP census tracts 6, 7, and 11 align along the Highway 75/North Freeway corridor which began construction in the early 1970’s and created a significant splitting and loss of neighborhood connectivity within the area. Rather than widening already existing commercial corridors, the highway demolished established residential areas and by-passed existing commercial areas.

• To the east, R/ECAP census tracts 8 and 12 align with North 24th Street, which was a primary commercial corridor and functioning streetcar route until 1951. Census tracts 8 and 12 are bounded on the east by railroad tracks and industrial areas, many of which were originally built in the late 19th Century. While there have been periods of investment in the area, it is now primarily identified by poverty, industrial activity, vacant property, empty lots and limited commercial or retail providers.

• The remaining R/ECAP census tracts, are primarily residential with only limited commercial activity occurring along Ames Avenue, an east-west corridor, and North 30th Street to the east. Sorensen Parkway, a curvilinear, limited-access
drive, and Fontenelle Boulevard, a residential drive, are the other main arterials in the area.

- All of the R/ECAP areas fall within the EPA Lead Superfund Focus Area with the exception of census tract 61.01.

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

Figure V-35 Omaha National Origin by Census Tract

Half of the R/ECAPs within the Omaha Consortia area have relatively small but diverse groups of foreign-born residents, with 2% or less of the population having a different national origin. They represent nationalities from East Asia; South Central Asia; Southwest Asia and the Middle East; South, West and East African countries; the Caribbean; and Central and South America.

As seen in Map 3 above, many non-R/ECAP census tracts within the Consortia area have much higher concentrations of populations from other nationalities than some of the R/ECAP areas. However, four R/ECAPs, representing census tracts 6, 8, 51, and 60, have nearly 5% to almost 10% of their population originating from a foreign place of
birth. In each of those census tracts, the primary foreign nationality is Mexican, with smaller percentages from El Salvador, Guatemala, and Thailand. The only exception is census tract 6, in the northern portion of the R/ECAP cluster. In that Census tract, the primary foreign place of origin is Thailand, representing 9.21% of all residents.

The two R/ECAP areas with the highest concentrations of foreign-born populations are census tracts 40 and 24. In census tract 40, in the southern portion of the R/ECAP cluster, 17.83% are of Mexican origin. In census tract 24, in south Omaha, 27.56% are of Mexican origin, and about 1% to 2% are natives of El Salvador and Guatemala. These concentrations are most likely due to proximity to jobs, friends and family already established in south Omaha, and the many culturally relevant shopping and services available in the area. The hub of Omaha’s Latino and Hispanic community is in south Omaha along South 24th Street. As mentioned earlier, Vinton Street and the Deer Park neighborhood in census tract 24 is a disconnected offshoot of that hub, separated by Interstate 80. South Omaha is also the home of large meat packing and other industrial employers, which are often the source of first employment for many new immigrants. This is particularly true for new arrivals that may not speak English well or have limited educational backgrounds.

Figure V-36 Omaha Limited English Proficiency
Limited English Proficiency (LEP) distribution within the R/ECAP areas is, not surprisingly, quite similar to the distribution of foreign-born populations. Spanish is by far the most common language among LEP populations in the R/ECAP areas. This is followed by Asian, African, Chinese, and other Indic languages. Areas of particular note are census tracts 24 and 40, the two southernmost R/ECAP areas, which have the highest concentrations of R/ECAP LEP populations. In census tract 24, 29.6% of the total population are LEP Spanish speakers with no other languages represented. In census tract 40, 17.25% of the population are LEP Spanish speakers, and 0.37% are LEP African language speakers.

The next largest area of LEP concentration is in census tract 6 in the north central R/ECAP area. Here 10.55% of the total population are LEP Asian language speakers and 1.05% are LEP Spanish speakers. This is followed by census tract 51 in the center of the R/ECAP area with a total population composed of 7.96% LEP Spanish speakers, 2.21% LEP African language speakers, and 0.71% LEP Chinese speakers. Census tract 8, in the north, accounts for the next largest area of LEP concentration and is the only R/ECAP area to have a concentration of other Indic language speakers. They make up 0.94% of the total population, while LEP Spanish account for 8.17% of the population. The R/ECAP with the smallest concentration of LEP populations is census
tract 61.01, the northernmost R/ECAP. Here 0.46% of the total population are African language speakers and 0.17% are Chinese speakers.

Overall though, the R/ECAPs do not represent the highest concentrations of LEP populations. Many of the census tracts immediately surrounding and to the south of the R/ECAP areas have much higher concentrations of LEP populations than the RE/CAPs themselves. These non-R/ECAP tracts also tend to have greater diversity among the language groups represented and include much larger concentrations of African, Asian and other Indic language populations. Throughout the jurisdiction and region, Spanish is still the dominant LEP language; however, there are small pockets of Tagalog, Slavic and many other languages not found in the R/ECAP areas. The fact that limited English proficiency is fairly widespread may be due to several factors including large enough population groups that the need to learn English is not very strong, low levels of literacy in general, and population age groups that may not have opportunities to interact with the larger English speaking population as often.
Source: Table 4 R/ECAP Demographics

Race and Ethnicity
It is important to note that the R/ECAP areas identified in the jurisdiction (Omaha) are the only ones in the region; therefore, the R/ECAP demographics for the region are identical across all categories. When compared to the overall regional and jurisdiction populations, the R/ECAP areas represent a marked difference in population concentrations.

The predominant minority group residing within the Omaha Consortia R/ECAPs is Black. While the Black, non-Hispanic population in the region is 7.73%, Black residents account for 51.88% of the total population in R/ECAP Census tracts. The second largest minority group residing in the R/ECAP areas is Hispanic, making up 19.61% of the total population, compared to 8.96% of the region. Conversely, while White residents make up 78.72% of the region, only 20.93% of the R/ECAP population is White. Much smaller percentages of 2% or less account for the remaining minority groups within the R/ECAP
areas. They are Asian, Pacific Islander, Native American or other non-Hispanic populations.

Figure V-37 R/ECAP Race and Ethnicity Omaha

The percentages are only slightly different for the jurisdiction compared to the region. For the jurisdiction, the predominant population is White and makes up 70.66% of the total population. Black residents make up 11.9% of the total population and Hispanic residents are 12.3% of the population. There is little change among the other racial populations for the jurisdiction. These distribution differences between the R/ECAP areas and the regional and jurisdiction areas, indicate an extremely high level of racial concentration among the Black population within R/ECAPs, and to a lesser degree, high concentrations of the Hispanic population in R/ECAPs. Native Americans also tend to be slightly more concentrated in R/ECAP areas, while Asian populations have a relatively steady dispersal rate within the R/ECAP areas, jurisdiction, and region.
As mentioned earlier, R/ECAP census tracts 40 and 24 have large concentrations of protected classes based on national origin, with Mexico being the most common place of foreign birth within the region. In census tract 24, 27.56% of the total population is of Mexican origin, and in census tract 40, 17.83% of the total population is of Mexican origin.

Compared to the jurisdiction and the region, these two R/ECAP areas represent an unusually high concentration of people of foreign birth. People born in Mexico account for just 4.62% of the total jurisdiction population and 3.06% of the total regional population. In the R/ECAP areas, 8.46% of the total population were born in Mexico. Sudan represents the second largest nationality group in the R/ECAP areas accounting for 1.47% of the total population. Other nationalities are also represented, with each making up 1% or less of the total population in the R/ECAP areas.

*Gender and Age*

Data for gender and age for individual R/ECAP areas is not available in the AFFH mapping tool. The population within the jurisdiction, however, is 49.07% male and 50.93% female. Similarly, in the region the population is 49.33% male and 50.67% female. The majority of the population in both the region and the jurisdiction are between the ages of 18 and 64, making up about 63% of the total population. Children under the age of 18 make up about 26% of the population, while people aged 65 and older make up about 11% of the population.
Familial Status, Persons with Disabilities and Other Protected Classes
Data for familial status is unavailable; however, 58.62% of the families in the R/ECAP areas consist of families with children. This is much higher than both the jurisdiction and the region. In the jurisdiction, 47.45% of families consist of families with children, and in the region 48.23% of families consist of families with children. R/ECAP populations with disabilities are discussed in Section D of this report. Data for religion, sexual orientation, and other protected categories are not available in the AFFH mapping tool.

c. **Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990)**
In addition to the changes in patterns of demographics and segregation/integration, Map 2 provides insight on the changes in concentrations of poverty among minority communities by outlining Racially/Ethnically Concentrated Areas of Poverty (R/ECAP). Observing the changes in the pattern of R/ECAPs also indicate patterns of segregation within Omaha’s jurisdiction.

**Figure V-39 R/ECAPS Omaha Jurisdiction 1990**

![Map](image)

Source: HUD Map 2 Race/Ethnicity Trends, Streets Background, No Demographic Data

In 1990 all twelve R/ECAPS were consolidated in North Omaha. These neighborhoods were primarily Black in 1990. The concentration of high levels of poverty in this area were a result of many different factors including those that were federally mandated in the form of housing discrimination prior to 1968 and the white flight of residents and businesses that followed the implementation of the Fair Housing Act.

**Figure V-40 R/ECAPS Omaha Jurisdiction 2000**
The loss of two R/ECAPs to the north and the addition of a R/ECAP in the far southeastern portion of the city shows the beginning of migration for Non-White residents out of North Omaha and the increase in population of Hispanic households already existing in South Omaha. The presence of one of Omaha Housing Authority’s largest public housing communities, the Southside Terrace, is in the southern R/ECAP census tract. This complex provides homes for many new immigrant and refugee families because of the large number of 4, 5, 6, and 7 bedroom units.

The 2010 map shows an increase in the number of R/ECAPS from eleven back up to twelve. The continual migration of Non-White residents to the northwest and south as the population grows shifted the areas of concentrated poverty. The R/ECAP to the far south has moved further north to the Deer Park neighborhood located near the intersection of Interstates 80 and 480. This tract (24) includes the historic Vinton Street corridor which is an active neighborhood commercial and retail center. However, it is cut-off from the main south Omaha Hispanic and Latino cultural hub of South 24th Street by Interstate 80.
The R/ECAPS once consolidated further north shifted to the south, with census tracts bordering the north and south of Dodge Street and downtown Omaha. The presence of several public housing towers and tax increment financing project for lower income households may have also impacted this southern movement of R/ECAPs. Census tract 51 is adjacent to Midtown Crossing and includes the historic residential areas of Bemis Park and Gifford Park. Many of the homes in the area have been restored and the area has active neighborhood associations. Both tracts 40 and 51 have seen a recent influx of condo and apartment development which is highly sought by people wanting to live in trendy neighborhoods close to downtown and near large employers and transportation along the Dodge Street corridor.
The current demographic map, based on 2016 ACS data, shows an decrease in the number of R/ECAPS from twelve down to nine. This may in part be do the beginning of economic recovery in the years following the 2008 housing crisis. The R/ECAP in the Deer Park Neighborhood is no longer present. This area was the location of the Omaha City Planning Department’s Holistic Revitalization Program from 2015 to 2017. The area post-2010 was already beginning to re-invest in the once booming Vinton Street business district and was due in part to active business owners along the corridor, an active neighborhood association, and City Council support. The R/ECAP to the far southern edge of the city has reemerged. The R/ECAP that bordered Dodge Street to the north has moved further north between Ames Avenue and Bedford Street. Development projects in midtown and downtown continue to improve the quality of housing but have also increased the prices in rental and homeownership driving residents in these areas to the south and north. Neighborhood revitalization in Bemis Park, Walnut Hill, and Gifford Park may have also impacted the movement of the R/ECAP north of Dodge further north.


**COUNCIL BLUFFS**

According to the HUD R/ECAP data, Council Bluffs has zero R/ECAP tracts as reported in the 1990, 2000 and 2010 US Censuses. The 2010 Census found seven areas of concentration of minority residents. Census tracts 305.02, 306.02, 307, 308, 309, 313 and 314 are areas of concentration of Hispanic residents. There were no additional areas of concentration for any single minority group in 2010. These census tracts are located in the central and western portions of the City and also contain higher concentrations of residents living in poverty or who are low-to-moderate income.

**BELLEVUE**

There are currently no R/ECAPs in Bellevue.

2. **Additional Information**

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

   Since 1990, R/ECAPs within the Consortia area, jurisdiction, and region have remained consistently anchored in North Omaha census tracts 7, 8, 11 and 12. This trend was influenced in part by destructive forces on the social and economic fabric of the area during construction of Highway 75 North in the early 1970’s.

   Over a span of two decades, homes were demolished, quiet residential streets and long standing neighborhoods ripped apart, and a sense of community destroyed. The scar that remains from the highway intrusion is both visible and deeply felt as its impacts continue to reverberate today.

   During the same time period, between the 1960’s and 1980’s, the area also experienced increasing White flight from north Omaha neighborhoods into outlying suburbs. This exacerbated the economic and social fallout from highway construction and diverted infrastructure investment to newer suburbs.

   It further decreased property values and increased the frequency of absentee landlords holding neglected and vacant property. The Nebraska Department of Economic
Recovery reported, "Construction of the North Omaha Freeway, coupled with social unrest in the 1970s, greatly impacted the North Omaha area. One neighborhood experienced a 30 percent housing loss and major increase in crime (2001)."

**Figure V-43 Images of North Omaha Pre and Post Highway 75**

Rather than serving as a connector, Highway 75 North cut off and accelerated the decline of commercial corridors along 30th and 24th Streets and the remaining industrial employment in the area. Business investment and job opportunities were pulled farther away to more accessible, affluent shopping centers, office and industrial corridors. The highway is often considered one of the greatest tragedies befalling Omaha and north Omaha in particular.

The pre-highway North Omaha neighborhood structure of residential tree-lined streets can be seen in the aerial image on the left from 1962. The image on the right, from 1982, shows the partially completed highway. This long, slow separation of North Omaha is only today beginning a path toward healing.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.
HUD Map 17 displays housing affordability based on rental units that are affordable in terms of 30% or less for residents making 50% of the average median income (AMI). However, a large population of Omaha residents living in R/ECAP census tracts earn incomes that qualify them at extreme poverty, or 30% AMI or lower (see HUD Map 12).

Census tract 7, for example, shows has over 50% of households incomes at 30% AMI or lower. When housing affordability is considered for households lower that 50% AMI, there are little to no options for units west of 72nd Street that would qualify as affordable (less than 30% of household income) that would not be included in publicly supported housing.
Map 5 shows few options to reside in publicly supported housing west of 72nd Street.

**Figure V-46 Omaha Publicly Supported Housing**

The maps below show housing affordability at 30% or lower based on the average median income for household in the R/ECAP tracts for both renters and homeowners.
When considering the median income of R/ECAP households, there is only one census tract outside of the current R/ECAP areas, which is tract 38 with units at rental rates between 20% and 30%. Even current R/ECAP census tracts have rental rates between 30% and 50% of the average R/ECAP households. The blue/grey census tract to the east of Boystown contains very little housing because it includes a cemetery, three schools, and two parks. There are apartments and houses listed in the area for rent, with at least one apartment complex listed under project-based section 8 housing.
When considering home ownership, the opportunities are even more limited for households at the average median income in R/ECAP tracts. There is not a census tract with homes listed at a range that would be considered 30% to 40% or less of the average median income for R/ECAP households. There are no options west of 72nd Street that would be under 60% of the average median R/ECAP income, and only select areas inside or outside the R/ECAPS at even 40% to 60%.

If affordable homes are either rare or not existent to rent or own outside of the R/ECAP areas it appears that the opportunity for low income persons living in R/ECAP tracts to move outside of concentrated areas of poverty is slim to none. The location and amount of affordable housing outside of R/ECAP tracts is a barrier to mobility for protected classes living in poverty within the R/ECAP areas.

3. Contributing Factors of R/ECAPs
Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

**OMAHA**

*Deteriorated and abandoned properties*: Age of housing stock in R/ECAP areas is on average older than most areas of the city. Community feedback included concerns about landlords not maintaining properties in the R/ECAP areas. Low income homeowners also struggle to maintain their housing or adapt it for accessibility.

*Lack of public investments in specific neighborhoods, including services or amenities*: Loss of housing density in many R/ECAP areas due to deteriorating housing stock and necessary demolitions has led to a loss of services and amenities in many neighborhoods. Lack of amenities and services also means fewer jobs within areas and limited ability for the residents of the area to spend money in their own neighborhoods.

*Lending discrimination*: Former redlining practices limited the investment of businesses and residents in R/ECAP areas. Comparison of current R/ECAP areas and formerly redlined areas shows the impact of redlining is still present today.

*Land use and zoning laws*: Laws and zoning including stormwater regulations, industrial zoning close to housing, and lack of zoning incorporating commercial and residential spaces are all issues in R/ECAP communities.

*Loss of Affordable Housing and displacement of residents due to economic pressures*: Redevelopment of Downtown and Midtown areas has increased housing costs in areas including: Dundee, Aksarben, Benson and Blackstone Neighborhoods, Midtown Crossing area and along Park Avenue, and neighborhoods near north of Downton.

*Location and type of affordable housing and lack of range of units and sizes, source of income discrimination, impediments to mobility, siting and selection policies, practices, and decisions for publicly supported housing*: All of these factors contribute to the concentration of poverty in majority minority neighborhoods. Lack of affordable and public housing to the west of 72nd is a barrier to housing choice and the ability of persons currently living in R/ECAP Census tracts to move elsewhere. The concentration of affordable housing and public housing to the east of 72nd also results in refugee and new immigrant groups settling in R/ECAP tracts.

**COUNCIL BLUFFS**
Council Bluffs does not have any R/ECAP areas. However, the areas with some racial/ethnic concentrations are areas with more affordable housing than areas that are high income mainly inhabited by White/Non-Hispanic households. The City has seen opposition in the past to affordable housing in the several neighborhoods. Recent examples of economic discrimination are the affordable units constructed in the Sawyer Building project located in the historic 100 Block of Council Bluffs and the Gunn School/Linden Place project in the north end. Private businesses and residents opposed the project and was the subject of many debates throughout the project.

BELLEVUE

There are currently no R/ECAP areas in Bellevue.

Introduction
Regional Versus Jurisdiction Analysis

The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA
Douglas County Housing Authority- DCHA
Council Bluffs Municipal Housing Agency- MHA
Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided
through the AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. All tables and data can be accessed online at: https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
Jurisdiction

Region

Limited English Proficiency [Jurisdiction] (Top 5 most populous)
1 Dot = 75 People
Spanish
Other Asian Language
African
Chinese
Other Indic Language

Public Housing
- Public Housing
- Scattered Sites

Other Multifamily

Project-Based Section 8

Low Income Housing Tax Credit

TRACT

R/ECAP
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

• **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
• **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
• **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
• **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
• **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
• **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

**COUNCIL BLUFFS**

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

31. **Downtown**: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
32. **Mid-City**: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
33. **Bluff-Willow**: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
34. **Kanesville-Tinley**: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
35. **North End**: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
36. **West End**: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
37. **South End**: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
38. **Twin City-Malmore Acres**: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
39. **Lake Manawa**: subdivisions east of Lake Manawa
40. **East End**: newer area to the east of Bluff-Willow and the North End to the city limits

**BELLEVUE**

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.
Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

### ii. Disparities in Access to Opportunity

#### 1. Analysis

##### a. Education

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

#### Access to Opportunity Indicators by Race/Ethnicity: School Proficiency

<table>
<thead>
<tr>
<th>Total population</th>
<th>Region</th>
<th>Omaha</th>
<th>Council Bluffs</th>
<th>Bellevue</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>52.38</td>
<td>43.63</td>
<td>27.18</td>
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<td>Black, Non-Hispanic</td>
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<td>14.26</td>
<td>32.17</td>
<td>43.15</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td>Mean Score</td>
<td>Median Score</td>
<td>Variance</td>
<td>Percentile Ranks</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>------------</td>
<td>--------------</td>
<td>----------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Hispanic</td>
<td>29.13</td>
<td>21.04</td>
<td>20.46</td>
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<td>40.93</td>
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<td>Native American, Non-Hispanic</td>
<td>33.59</td>
<td>23.20</td>
<td>23.26</td>
<td>39.03</td>
</tr>
</tbody>
</table>

**Population Below Federal Poverty Line**

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Mean Score</th>
<th>Median Score</th>
<th>Variance</th>
<th>Percentile Ranks</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
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<td>30.24</td>
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<tr>
<td>Native American, Non-Hispanic</td>
<td>23.01</td>
<td>22.62</td>
<td>16.64</td>
<td>42.23</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

HUD Table 12 ranks access to proficient schools based on the state assessment score of 4th grade student in reading and math. The index incorporates scores for up to three schools within 1.5 miles of a block group. According to HUD, “values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.”

When comparing opportunity indicators according to HUD Table 12 across the region Black, Non-Hispanic households have the lowest scores and White, Non-Hispanic students have the highest scores. This is true for all students and students identified as living below the federal poverty line. According to the same data, the score for Black, Non-Hispanic students in Omaha are lower than those regionally both above and below the poverty line. Index scores for all other groups of students are also lower in Omaha compared to the region.

Both Council Bluffs and Bellevue show higher school proficiency scores than those regionally for Black, Non-Hispanic students. Council Bluffs index scores are highest for
Black, Non-Hispanic students living both above and below the poverty line. Scores are lowest for Hispanic students when looking at all students, but almost three times lower for students who identify as Asian-Pacific Islander when looking at those below the federal poverty line. In Bellevue, White students have the highest index scores above the poverty line but Hispanic students have the highest scores below the poverty line. Native American students have the lowest index scores above the poverty line but below the poverty line Black, Non-Hispanic students have the lowest scores.

Although the HUD school proficiency index provides data related to the distance of census tracts to proficient schools, analysis is limited because the data collected is limited to only 4th graders and only standardized test score. In order to gain a more accurate view of access to proficient schools, it would require a look at more than one factor and students at different age ranges.

OMAHA

According to HUD table 12 above, in the Omaha jurisdiction, White and Asian populations have proficiency index scores that are twice as high as the proficiency scores for Black and Hispanic students. Native Americans have a slightly higher average than Black and Hispanic students, but still almost have the proficiency index scores of White and Asian students.

For students living below the federal poverty line and within areas of concentrated poverty, the gap is even larger between White and Asian students and Black and Hispanic students. Asian students living below the poverty line have slightly higher school proficiency index scores that White students living in poverty. Again, Native American students have slightly higher index scores that Black or Hispanic children, but still significantly lower scores than their White or Asian counterparts. Black students in the jurisdiction had the lowest proficiency scores both above and below the poverty line.

The school proficiency index is a limited measurement of assessing access to proficient education, but when comparing state test scores for all grades, gaps between White and Black students are also present. For example, when comparing Nebraska State Assessment scores in Omaha Public Schools (OPS), which has 28% students who identify as white, the overall percentage of students grades 3 through 11 who test a level considered to be proficient in English language arts is 35%. When comparing proficiency by race, only 23% of Black students were proficient compared to 55% of White students who tested at a proficient level. In Math for the same grades, 53% of all students were at a proficient level. The gap, however, was even greater, with only 37% of Black students achieving proficiency compared to 71% of White students. The gap
was greatest in the area of science, with 50% proficiency across all students, but only 35% of Black students compared to 74% of White students achieving proficient scores.

| Table V-15 Nebraska State Assessment, Percentage Proficiency of Students Grades 3-11 |
|---------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| Student Population              | Omaha Public Schools (OPS)    | Millard Public Schools (MPS)  |
|                                 | English | Math | Science | English | Math | Science |
| All Students                    | 35%     | 53%  | 50%     | 63%     | 80%  | 80%     |
| White                           | 55%     | 71%  | 74%     | 64%     | 82%  | 84%     |
| Black                           | 23%     | 37%  | 35%     | 44%     | 59%  | 59%     |

Source: Nebraska Department of Education; Public Schools 2016-2017 School Year

Conversely, in primarily White school districts, Black students have higher test scores than those in primarily Non-White school districts. For example, Millard Public Schools (MPS) has 78% of students who identify as White. Black students that achieved scores considered proficient were more than 20 percentage points higher in every category than Black students at OPS. The gaps in English, Math, and Science between Black and White students at MPS still exist but are roughly 20 to 25 percentage points apart rather than a difference of 22 to 39 percentage points in OPS.

In recent years some researchers have suggested that cultural bias may influence standardized testing, giving white students an advantage over non-white students. Standardized tests should not be used to alone identify which schools are proficient, but they are a major factor measured by the state to identify school proficiency and college readiness for students.

Cultural bias may serve as one explanation for the difference in percentage of students who are proficient within schools. Additionally, poverty and language barriers may have
a significant impact on both the difference in proficiency between Black and White students and the difference in test scores from one school district to another.

Table V-16 Percentage of Students Qualifying for Free/Reduced Meals and ELL Services

<table>
<thead>
<tr>
<th>Specific Segment of Student Population</th>
<th>Statewide Average</th>
<th>Omaha Public School Students</th>
<th>Westside Public School Students</th>
<th>Millard Public School Students</th>
<th>Elkhorn Public School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>%English Language Learners</td>
<td>7.28</td>
<td>18.43</td>
<td>3.15</td>
<td>1.81</td>
<td>.70</td>
</tr>
<tr>
<td>%Qualify for Free/Reduced Meal</td>
<td>44.65</td>
<td>74.24</td>
<td>34.99</td>
<td>20.91</td>
<td>7.56</td>
</tr>
</tbody>
</table>

Source: Nebraska Department of Education; Public Schools 2016-2017 School Year

When comparing Omaha Public School district (OPS), the only majority Non-White district, to other schools districts within Omaha City limits, there are significant differences in the number of students who qualify for services for English Language Learners (ELL) and those who qualify for free/reduced meals based on household income. OPS has more than double the percentage of ELL students as compared to the statewide average, and over 5, 10, and 26 times more ELL students than other school districts within the city. Considering the fact that OPS only allows ELL services for students for up to 2 years, the likelihood of an additional percentage of students who have may have additional needs in OPS is likely higher.

When comparing students who qualify for free or reduced meals across the same four districts, it is apparent that the average household income is higher for the primarily White school districts than it is for OPS. OPS has over 2, 3, and almost 10 times more students whose household incomes qualify them for free and reduced lunch as compared to Westside, Millard, and Elkhorn Public School districts. Research on the impact of socioeconomic factors on developing communication skills, academic performance, and dropouts rates shows that in addition to affecting learning, poverty also creates psychological and physical effects that further disadvantage students in the classroom (Ooms et al., 2016).

COUNCIL BLUFFS
In Council Bluffs, access to high-performing elementary schools is consistent across the races/ethnicities except in those below the poverty line. For those below the poverty line, Asian/Pacific Islanders have the biggest disparity with an 8.92 value difference.

Students of school age in the Council Bluffs Community School District are assigned schools based on residency. However, the school district has an in-district transfer option for parents so they may choose to send their children to any school within the district. The other option available throughout the state is the ability for a parent to use the Open Enrollment option, and enroll into a school district other than the one in their area of residence. There are two middle schools and two high schools in the Council Bluffs Community School District.

The specific barrier to attendance or enrollment at a school other than the assigned school is transportation. The school district does not provide free school bus transportation to another school or district if a student is not attending the school to which they are assigned based on residency. The exception to this is if a student has an Individual Education Plan that calls for specialized transportation based on a developmental or physical disability.

The Lewis Central Community School District serves the southern and eastern-most portions of the City (Census Tracts 313 Block 2, 314, 315, 316.01, and 316.02) and has approximately 2,500 students enrolled. Starting as the school for the township, areas served within city limits include the Lake Manawa area, Twin City and Malmore Acres, Ferndale, Forest Glen/Kingsridge, and Hills of Cedar Creek. The school district has four buildings located in the district. Each building serves specific grades: Kreft Primary (pre-kindergarten to 1st grade), Titan Hill Intermediate (grades 2-5), Lewis Central Middle (grades 6-8) and Lewis Central High school (grades 9-12). Students are bussed to the school for their respective grades no matter where located within the district. This system helps combat disparities within the district. For both school districts, more than half of all students receive free or reduced lunch.

Council Bluffs is also home to Iowa School for the Deaf (ISD). ISD offers both day and boarding options and is financed primarily by the State of Iowa. There is no charge for tuition, room, board or transportation fees to families. The school offers pre-school, kindergarten – 12 and 12+ programs for students who are deaf or hard of hearing. Residents from both Iowa and Nebraska are accepted. ISD often partners with Lewis Central High School for classes due to adjacent campuses.
According to data from HUDTable 12 (see below), the opportunity scores related to education for the City of Bellevue’s block groups. The school proficiency index is calculated based on the performance of fourth grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Elementary schools are linked with block-groups based on attendance zones, or within district proximity matches of elementary schools which 1.5 miles of the block group.

### Table V-17 Bellevue School Proficiency

<table>
<thead>
<tr>
<th>Population</th>
<th>School Proficiency Index</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Bellevue</td>
<td>Omaha-CB Region</td>
</tr>
<tr>
<td><strong>Total Population</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>38.00</td>
<td>37.45</td>
<td></td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>43.39</td>
<td>16.80</td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>37.61</td>
<td>16.87</td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>40.21</td>
<td>36.35</td>
<td></td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>34.82</td>
<td>21.93</td>
<td></td>
</tr>
<tr>
<td><strong>Population below federal poverty line</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>37.41</td>
<td>35.22</td>
<td></td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>30.76</td>
<td>18.33</td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>41.38</td>
<td>17.78</td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>42.75</td>
<td>33.71</td>
<td></td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>47.26</td>
<td>32.19</td>
<td></td>
</tr>
</tbody>
</table>
In Bellevue, the average school proficiency index value is very close for all races with a difference of only 8.57 between the highest index of 43.39 and lowest index of 34.82. This small range indicates that no particular protected class has excessively better or worse access to education. Non-Hispanic Black residents have the highest average school proficiency index value at 43.49. The lowest index value is for non-Hispanic Native American residents with 34.82.

Disparities become apparent when taking federal poverty levels into consideration. When reviewing only the population below the federal poverty line, non-Hispanic Black residents school proficiency index is 30.78, which is 12.63 below the Black total population index value. The school proficiency index number increases for non-Hispanic Native American, Asian or Pacific Islander, and Hispanic residents living below the federal poverty line.

Overall, School Proficiency indices in Bellevue are higher than the surrounding Omaha-Council Bluffs regional area.
HUD AFFH Map 7 was utilized to view School Proficiency by census tract. The higher the indices, the higher the level of school proficiency. The highest level of school proficiency is located in southwest area of Bellevue while the lowest proficiency is located in northeast Bellevue.

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

OMAHA

Residential living patterns play a larger role in the disparities in access to proficient schools in the Omaha jurisdiction. According to HUD Map 7 below, Demographics and School Proficiency, shows how school proficiency scores decrease moving geographically from west Omaha to east Omaha, with the lowest performing schools
locate in and around R/ECAP census tracts. These census tracts also have the highest numbers of Black and Hispanic residents.

**Figure V-50 Omaha School Proficiency**

As previously established in section i, school proficiency rates vary between race and/or ethnicities and between school districts in the Omaha jurisdiction. In 2014 the Nebraska legislature implemented a performance system for rating schools called Accountability for a Quality Education System Today and Tomorrow (AQuESTT). The system is meant to rate a school for performance beyond just state assessment and graduation rates. See Attachment I for details on the index for AQuESTT ratings. (Source: NDE.AQuESTT@nebraska.gov)

The map below was created to reflect AQuESTT ratings for public middle schools and high schools in the Omaha area. It is again apparent that living patterns play a role in access to school proficiency.
Spatially, the majority of schools in the Omaha Public School District (OPS) are located to the East of 72nd Street. Westside, Millard, and Elkhorn District schools are all located to the West of 72nd street. Looking further into the discrepancies between school districts within the City of Omaha, the impact of living patterns on school proficiency rates reveals the impact of segregation on access to proficient education for persons based on race and/or ethnicity.
When comparing the population of the City of Omaha with Omaha Public Schools, the
district and city have very different racial dynamics. A city with a population which is
69% White contains a schools district (the largest in the city), which is 72% Non-White.
This would not be possible without segregatory living patterns.

Table V-18 Public School District Demographics

<table>
<thead>
<tr>
<th>Population</th>
<th>Omaha (City Limits)</th>
<th>Omaha Public School Students</th>
<th>Westside Public School Students</th>
<th>Millard Public School Students</th>
<th>Elkhorn Public School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>443,072</td>
<td>52,344</td>
<td>5,999</td>
<td>23,980</td>
<td>8,685</td>
</tr>
<tr>
<td>% White</td>
<td>69%</td>
<td>28%</td>
<td>73%</td>
<td>78%</td>
<td>88%</td>
</tr>
<tr>
<td>% Non-White, Non-Hispanic</td>
<td>31%</td>
<td>72%</td>
<td>27%</td>
<td>22%</td>
<td>12%</td>
</tr>
</tbody>
</table>

Source: Nebraska Department of Education, Public Schools 2016-2017 School Year, Population Data 2016 American Community Survey

Segregation patterns in the City can also be observed by comparing teachers in each
school district. According to the Nebraska Department of Education data on teachers,
Millard and Elkhorn both have over 97% teachers employed that identify as White and
Westside just slightly lower at 96%. OPS data shows just under 88% of teachers
identifying as White. Across the state, only 1.02% of teachers identify as Black or
African American, but Westside, Millard, and Elkhorn all have less than 1% of teachers
who are Black or African American. OPS, having a makeup of over 25% African American or Black students, has 4.69% of teachers identifying as African American or Black. Other interesting data sets are average tenures of teachers across schools
districts, average salaries, and the percentage of teachers with Master's Degrees.
Although there are some differences among tenure and salary, the greatest difference is
found in the percentage of teachers with Master’s degrees. Although the percentages of
teachers with Master’s degrees are slightly lower in OPS, it may be due to the
significantly larger size of the district and number of teachers within the schools.
Table V-19 Public School Teacher Profiles

<table>
<thead>
<tr>
<th>Teacher Profile</th>
<th>Statewide Average</th>
<th>Omaha Public School Students</th>
<th>Westside Public School Students</th>
<th>Millard Public School Students</th>
<th>Elkhorn Public School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average Years Teaching Experience</td>
<td>14.15</td>
<td>11.86</td>
<td>11.59</td>
<td>14.03</td>
<td>12.78</td>
</tr>
<tr>
<td>Average Teaching Salary</td>
<td>52,534</td>
<td>49,881</td>
<td>49,694</td>
<td>53,137</td>
<td>54,045</td>
</tr>
<tr>
<td>%Teachers with Masters Degree</td>
<td>54.14</td>
<td>57.92</td>
<td>68.13</td>
<td>70.42</td>
<td>68.54</td>
</tr>
</tbody>
</table>

Source: Nebraska Department of Education Public Schools 2016-2017 School Year

As mentioned in section i, statewide assessment proficiency percentages vary between school districts within the City of Omaha. Westside, Millard, and Elkhorn districts all have averages above the statewide average in every category. Omaha Public Schools proficiency percentages are all below the statewide average.

Figure V-20 Nebraska Statewide Assessment Proficiency Percentage Scores 2016-2017

<table>
<thead>
<tr>
<th>NESA</th>
<th>Statewide Average</th>
<th>Omaha Public School Students</th>
<th>Westside Public School Students</th>
<th>Millard Public School Students</th>
<th>Elkhorn Public School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>51%</td>
<td>35%</td>
<td>59%</td>
<td>63%</td>
<td>80%</td>
</tr>
<tr>
<td>Math</td>
<td>72%</td>
<td>53%</td>
<td>78%</td>
<td>80%</td>
<td>95%</td>
</tr>
<tr>
<td>Science</td>
<td>70%</td>
<td>50%</td>
<td>76%</td>
<td>80%</td>
<td>95%</td>
</tr>
</tbody>
</table>

Source: Nebraska Department of Education Public Schools 2016-2017 School Year (*2017 statewide percents include students in grades 3-8 and 11th grade alternate assessment students)
Because the local districts differ in how students are assigned schools, the HUD AFFH mapping tool does not accurately represent access to proficient schools. Map 9 identifying proficient public schools shows those in the western and northern-most portions of the city having lower access to proficient schools than the rest of the community. Additionally, it shows the southern and eastern portions as low access as well, however this is deceiving due to how the Lewis Central Community School District classifies its levels. A portion was not graded in the system creating a skew in the mapping. The City consulted with HUD Technical Assistance but because of the data query type, this was unable to be corrected. The City utilized only local data to ensure proper representation.

The Iowa Department of Education grades each public school on a variety of performance measures. The data come from multiple sources. Assessment results are received from the state’s assessment vendor, Iowa Testing Programs at the University of Iowa. Graduation rates and attendance rates are reported to the Department by school districts through the Student Reporting in Iowa collection system. Lastly, staff retention data are reported by districts in the Fall Basic Educational Data Survey Staff collection. This information is added into the Iowa School Report Card database and the system assigns one of six overall ratings based on the measures: Exceptional, High-Performing, Commendable, Acceptable, Needs Improvement and Priority.

Table V-21 Iowa Department of Education School Report Cards 2016
According to the Iowa School Report Card, two of the Council Bluffs Public School District elementary schools were identified as “commendable” in the study’s 2016 findings (Crescent, Hoover). Four were identified as “acceptable” (College View, Lewis and Clark, Longfellow, and Rue) and three were identified as “needs improvement” (Bloomer, Edison, Franklin). Two elementary schools in the district are “priority” (Carter Lake and Roosevelt). The “needs improvement” and “priority” schools are located in the West End and Mid-City areas, which coincide with the highest poverty areas.

For middle schools, Woodrow Wilson was identified as “needs improvement” and Gerald W. Kirn labeled “acceptable.” Abraham Lincoln High School was labeled “acceptable” and Thomas Jefferson as “needs improvement.” Woodrow Wilson and Thomas Jefferson are both located in the West End and are populated with students from Carter Lake, Edison, Franklin, Roosevelt, and Rue which are all “needs improvement” or “priority” schools with the exception Rue.

The Lewis Central Community School District is divided into primary (pre-kindergarten to 1st grade), intermediate (grades 2-5), middle (grades 6-8) and high school (grades 9-12) levels. The primary level was not rated. Both intermediate and middle school levels
were identified as “acceptable” and high school as “commendable.” Attachment G includes all Iowa Department of Education School Report Cards.

**BELLEVUE**

HUD AFFH Map 7 shows the school proficiency index with race indicated by the dots. When looking at the Bellevue community the higher school proficiency rates can be found in the southwest area of town, which is a newer development area. This area is in the Bellevue Public school district. The lower school proficiency index rates were in northeast sections of Bellevue. A portion of the north area of Bellevue is covered by Omaha Public school district.

**Figure V-52 Bellevue School Proficiency and Race/Ethnicity**

The Map 7 also depicts the School Proficiency Index with an overlay of National Origin. The majority of residents with national origins outside of the United States are in areas
of Bellevue with moderate school proficiency index values. Most are in areas where school proficiency index values are between 30 and 50.

**Figure V-53 Bellevue School Proficiency National Origin**

Source: HUD Map 7 School Proficiency and National Origin; Dot Density 1:25

School Proficiency Index as related to Family Status shows that several block groups with high concentrations of families with children are in areas with high school proficiency. Specifically, these areas include the neighborhoods in southwest Bellevue.

**Figure V-54 Bellevue School Proficiency and Family Status**
iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge,
discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

OMAHA

School boundaries, race/ethnicity, disparities, and funding in Douglas and Sarpy County have been a topic of debate for decades. In 1973 Omaha Public Schools, the only schools district in the City at that time, was sued for allowing and intentionally maintaining racial segregation among both students and staff. Many attempts to desegregate schools including busing children of different races to different parts of the City, experienced community opposition. In 1999 the busing policy ended and OPS returned to a neighborhood school policy.

In more recent years, the issue debated has been funding and additional resources for OPS schools with significant needs. In 2009 the Learning Community of Douglas and Sarpy County, made up of 11 school districts across two counties, was formed to ensure families across the region received access to quality education and schools had the resources necessary to support students. A shared or “common” tax levy was created to help fund Learning Community initiatives. The tax levy was heavily debated in the Nebraska District and Federal courts. In 2016 the common tax levy was removed. (Source: learningcommunityds.org) The disproportionate burden placed on OPS to serve students with financial assistance and language services remains.

The impact of poverty and the importance of early childhood development on educational disparities has become an issues many are prioritizing in Douglas and Sarpy Counties. Organizations such as Educare Nebraska, Holland’s Children’s Movement, Step Up to Quality, First Five Nebraska, and the Buffett Early Childhood Institute are working towards solutions to help bridge the gap for children living in or near poverty in the area. Strategies include coordinated entry programs for young mothers, comprehensive family health care and support, improving the quality of childcare and early learning centers, and other programs aimed to connect low to moderate income families with necessary resources (Source: Fawn Taylor, Executive Director of Educare Nebraska).

COUNCIL BLUFFS
The two school districts focus on student achievement. Significant intervention and attention to strengthening the classroom instruction to each of the Iowa core standards for education are the norm.

Both districts offer preschool and summer school learning programs based on need. These programs are funded by a combination of state, federal and private sources. Additionally, before and after school programs are available for parents to accommodate working schedules. These programs offer a learning-child watch combination to assist parents with care.

In addition to the public schools, Council Bluffs has three private schools:

1. St. Albert Catholic School is a Pre-K to 12th grade district with approximately 775 students. It is the sixth largest catholic school in Iowa with at 13:1 pupil/teacher ratio.
2. Heartland Christian School is a Pre-K to 12th grade district that also sponsors homeschool learning in addition to standard classroom work.
3. Liberty Christian School is a K to 12th grade district with approximately 20 students. Each student is prescribed learning materials at their own academic level. Academic level is not determined by age or school grade, but by his/her own ability as evidenced through specialized testing. Each student is then able to learn at their own rate with all teacher help being on a one-to-one basis.

Overall, the city's population has a high school graduation rate of 85.8% according to the 2016 US Census Update. In the 2017 school year, graduation rates rose to 88.42% city-wide. This almost matches the highest percent level ever reach which was 88.5% in 2015. Council Bluffs achieved a rate of 88.42% and Lewis Central a rate of 93.36% in 2017.

In 1999, Council Bluffs CSD hired its first graduation coach to combat high dropout rates. In the 2009-2010 school year, the dropout rate was 6.7%, or 178 students, which was the highest rate in a five-year period. There are now 10 graduation coaches throughout the district with significant improvement shown in reduced dropout rates. In 2016, the dropout rate dropped to 2.7%, or 71 students. Currently, eight schools in the Council Bluffs school district staff graduation coaches: Bloomer, Franklin and Roosevelt elementary schools; Thomas Jefferson and Abraham Lincoln high schools; Wilson and Kirn middle schools; and Kanesville Alternative School. These schools coincide with the high poverty neighborhoods within the city.
Council Bluffs Municipal Code 1.40.120 “Unfair or Discriminatory Practices – Education” states that no institution shall discriminate in education in any program or activity (see Attachment J).

BELLEVUE

According to the 2015 American Community Survey, 92 percent of Bellevue residents have is a high school graduate or higher. Of the high school graduates, 28 percent have a bachelor’s degree or higher.

The City of Bellevue city limits are served by three different school Bellevue, Papillion-La-Vista, and Omaha. In the map below, green indicates Omaha School District, pink is Bellevue School District, and blue is Papillion-La-Vista School District. The main school district is Bellevue Public School District which consist of 2 high schools, 3 middle schools, and 15 elementary schools serving slightly over 10,000 students.

Figure V-55 Bellevue School Districts

During community outreach, the overall input was that households move to Bellevue for the education opportunity provided by Bellevue Public Schools. The schools provided a
sense of community and outreach to include students, parents, and the surrounding supportive community.

Current policies allow for “open enrollment” which allow students to request a transfer between school districts. There is no waiting list overall for transferring into Bellevue Public Schools. There are restrictions on request for specific schools; if that school is full, the student would need to request a different school within the school district.

School transportation is provided above state requirements. If a household is within four miles of a high school, two miles of a middle school, and one mile of an elementary school, transportation is not provided by the school district. If an open enrollment request is granted, transportation is the responsibility of the household. This could present barriers to transferring between school districts for some households with limited transportation options.
b. Employment

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

Figure V-56 Regional Employment by Industry

Source: LEHD, 2014

Regional employment is distributed among several sectors, yet the largest sectors include healthcare and social assistance, retail trade, educational services, accommodation and food services, manufacturing, and finance and investment. Both local and HUD supplied data was combined to create the following, more detailed analysis of employment throughout the region. The employment data from Omaha, Council Bluffs and Bellevue will be compared against that of the region below.


**OMAHA**

*Labor Markets*

According to HUD, the Labor Market Engagement Index “provides a summary
description of the relative intensity of the labor market engagement and human capital
in neighborhoods (HUD, 2015).” Factors that contribute to the index are employment
opportunities, persons participating in the labor force, and the level of education in an
area, specifically persons 25 years or older who have achieved a bachelor’s degree. A
higher index number is an indicator of the more participation and human capital within
the census tract.

**Table V-23 Comparison of Labor Market Index**

<table>
<thead>
<tr>
<th>Labor Market Index</th>
<th>Omaha, NE CDBG, ESG</th>
<th>Council Bluffs, IA CDBG</th>
<th>Bellevue, NE CDBG</th>
<th>Omaha-Council Bluffs, NE-IA Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>73.64</td>
<td>56.09</td>
<td>68.68</td>
<td>74.72</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>38.03</td>
<td>50.33</td>
<td>68.59</td>
<td>43.98</td>
</tr>
<tr>
<td>Hispanic</td>
<td>43.81</td>
<td>45.22</td>
<td>66.61</td>
<td>51.10</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>70.74</td>
<td>50.51</td>
<td>66.87</td>
<td>75.16</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>47.52</td>
<td>49.07</td>
<td>63.42</td>
<td>55.77</td>
</tr>
<tr>
<td>Population below federal poverty line</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>61.13</td>
<td>50.30</td>
<td>61.53</td>
<td>62.80</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>32.25</td>
<td>60.81</td>
<td>55.66</td>
<td>35.25</td>
</tr>
<tr>
<td>Hispanic</td>
<td>37.33</td>
<td>51.89</td>
<td>67.58</td>
<td>43.21</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>60.98</td>
<td>50.00</td>
<td>67.10</td>
<td>63.45</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>46.75</td>
<td>52.33</td>
<td>62.50</td>
<td>48.31</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

While every group living in Omaha shows Labor Market Index scores below the regional
average, Figure V indicates that within Omaha the labor market index is highest for
persons who identify as White and Asian or Pacific Islander (designated as non-
Hispanic). These same groups have the lowest level of poverty within the jurisdiction,
according to the low poverty index. Additionally, large disparities between individuals
identifying as White and Asian, non-Hispanic and other groups exists, with those
identifying as Black non-Hispanic and Hispanic scoring at least thirty points lower in the
Labor Market Index for the city. These large disparities exist for populations both above
and below the poverty line. Moreover, Black and Hispanic households, particularly those
falling below the poverty line, living in Omaha show the lowest labor market index
scores of any city with in the region.

*Job Proximity*
Job Proximity Index as defined by HUD is “the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.” The index uses a gravity model to measure access of neighborhoods to job locations and incorporating size of employer and job opportunities as well as the labor supply or competition for jobs at those locations. A higher the index number is an indicator of greater proximity to jobs within the census tract.

Table V-24 Comparison of Job Proximity Index

<table>
<thead>
<tr>
<th>Jobs Proximity Index</th>
<th>(Omaha, NE CDBG, ESG) Jurisdiction</th>
<th>(Council Bluffs, IA CDBG) Jurisdiction</th>
<th>(Bellevue, NE CDBG) Jurisdiction</th>
<th>(Omaha-Council Bluffs, NE-Iowa) Region</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Population</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
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<tr>
<td>Hispanic</td>
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<td>42.04</td>
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</tr>
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<td>Native American, Non-Hispanic</td>
<td>53.32</td>
<td>52.35</td>
<td>39.63</td>
<td>52.51</td>
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<tr>
<td><strong>Population below federal poverty line</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>White, Non-Hispanic</td>
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</tr>
<tr>
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<td>42.76</td>
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</tr>
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<td>Native American, Non-Hispanic</td>
<td>50.29</td>
<td>49.67</td>
<td>39.73</td>
<td>49.63</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Similar to households across the region, households living in Omaha have lack luster scores on the Jobs Proximity Index. Regardless of race, ethnicity or income the Jobs Proximity Index shows less than a ten point variation for all households living within Omaha. Yet for those above the poverty line, Asian/Pacific Islander households and Native American households show the greatest proximity to jobs, while Black households show the least proximity to jobs. For households falling below the poverty line, White households show the greatest proximity to jobs, while Black households and Asian/Pacific Islander households are shown to be the furthest from jobs. This difference in job proximity for Asian/Pacific Islander households living below the poverty line and their counterparts above the poverty line may indicate that they live in significantly different areas of the city.

COUNCIL BLUFFS

According to the Labor Market Engagement Index, in the metro area, White/Non-
Hispanic have higher rate of employment, labor-force participation and population over 25 with a bachelor’s degree than any other race (74.72%). When below the poverty rate, White/Non-Hispanics have a Labor Market Engagement rate of 62.80%. Black/Non-Hispanic have the lowest with 43.98% and when below the poverty level a rate of 35.25%.

In Council Bluffs, disparities in the labor market index show a clear picture of the locations of high poverty neighborhoods. The west end and mid-city neighborhoods have the lowest labor market index and the highest is located in the east end or high-end housing exists.

The job proximity map reverses the labor market index map with individuals from the east end having longer commutes than those in the west end and mid-city neighborhoods. According to the US Census, of the 30,328 over 16 years old workers 83.8% drive to work alone, 9.3% carpool, 2.3% work from home and 1.1% use public transportation. The mean travel time to work is 18.5 minutes.

BELLEVUE

Table V-25 Bellevue Job and Labor Market Engagement Indexes
<table>
<thead>
<tr>
<th>Population</th>
<th>Jobs Proximity Index</th>
<th>Labor Market Engagement Index</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Bellevue, NE</td>
<td>Omaha-Council Bluffs Region</td>
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<tr>
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<tr>
<td>White, Non-Hispanic</td>
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<td>43.98</td>
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<td></td>
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<td>51.24</td>
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<td>Hispanic</td>
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</tr>
<tr>
<td></td>
<td>63.42</td>
<td>55.77</td>
</tr>
<tr>
<td>Population below federal poverty</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>49.35</td>
<td>53.87</td>
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<td>61.53</td>
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<td></td>
<td>55.66</td>
<td>35.25</td>
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<tr>
<td>Hispanic</td>
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<td>49.97</td>
</tr>
<tr>
<td></td>
<td>67.58</td>
<td>43.21</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-</td>
<td>54.91</td>
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<tr>
<td>Hispanic</td>
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<tr>
<td>Native American, Non-Hispanic</td>
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<td>49.63</td>
</tr>
<tr>
<td></td>
<td>62.50</td>
<td>48.31</td>
</tr>
</tbody>
</table>

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
According to the Job Proximity Index, compared to the total population, Asian families live closest to employment center with a 51.24 index. The White, Black and Hispanic residents are all relatively similar with 40.7, 49.75, and 43.34 respectively. Native Americans are faced with the living the furthest distance to employment centers with an index of 39.84. For the population living below the federal poverty line, White residents live closer to than their general population counterparts with an increased index of 49.35. The remaining groups have similar job proximity to the general population counterparts.

Regional index rates show that White, Black, and Hispanic households all have similar job proximity to their counterparts living below the poverty level with index rates fluctuating only slightly +/-2.6. The biggest difference was in Asian and Native American who saw a decrease in the population living below the poverty line from 53.97 to 48.26 and from 52.51 to 49.36 respectively. Overall, regional figures are not an improvement over Bellevue scores, which suggest that a housing location within Bellevue will likely offer residents similar access to job centers.

Bellevue’s total population has relatively high labor market index values with the highest being non-Hispanic Whites with 68.68, followed closely by non-Hispanic Blacks with 68.59 and the lowest being non-Hispanic Native American with 63.42. The discrepancy increases for the population below the federal poverty line. This causes the labor market index for non-Hispanic Blacks to drop to 55.66.

Overall, Asian or Pacific Islander and Hispanic households living below the poverty line tend to have better labor force participation than the general population, while White Non-Hispanic households, Blacks and Native Americans living below the poverty line have lower labor work participation than their populations at large.

Regional index rates show that non-Hispanic White and Asian residents tend to have better labor force participation, regardless of income. The population of non-Hispanic Blacks has the lowest labor market index rates regardless of income. Overall, regional figures are not an improvement over Bellevue scores, which suggest that Bellevue has better labor force participation and human capital than the surrounding region.

Together the Jobs Proximity Index and Labor Market Engagement Index show that while the city population tends to be more engaged with the labor market both areas offer the same regarding employment proximity to neighborhoods and most residents must find transportation to employment.
ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

_Labor Market Index_

**Figure V-57 Regional Labor Market Index**

Source: HUD Map 9 Labor Market; A view of the regional labor market index.
Figure V-58 Omaha Labor Market Index

Source: HUD Map 9 Labor Market; Labor market index data for the Omaha area. Census tract codes with lower labor market index numbers are lighter and color, and as those numbers increase, the shade of grey becomes darker.

Comparison of the labor market index between the City of Omaha and the Region show that the lowest labor market index numbers are located on the far eastern portion of Omaha, along the border of Nebraska and Iowa. All R/ECAPS tracts in the region are also found within Omaha’s jurisdiction along the far eastern portion of the City. The lowest Labor Index score in the jurisdiction falls within a R/ECAP tract and has a score of 4, while the majority of R/ECAP tracts have labor market index scores under 20.
Race/Ethnicity Labor Market

Figure V-59 Regional Labor Market Index

Source: HUD Map 9 Demographics and Labor Market Index

Figure V-60 Omaha Race/Ethnicity Labor Market Index

Source: HUD Map 9 Labor Market, White Population Removed, Dot Density 1:50
According to the Map 9 above, R/ECAP tracts and groups other than those who identify as White or Asian, non-Hispanic are concentrated within the eastern portion of Omaha’s jurisdiction. A majority of the population living in R/ECAP areas is made up of a people identifying as Black, non-Hispanic, while areas in the southeastern part of the City has a large population identifying as Hispanic.

_National Origin and the Labor Market_

_Figure V-61 Regional Labor Market Index and National Origin_

Source: HUD Map 9 Labor Market Index
Additionally, when comparing the the City of Omaha to the greater region, higher levels of foreign-born persons are also more concentrated in the eastern portion of the City, along the Iowa and Nebraska border. According to AFFH Table 1 and HUD Map 2, the largest population within the jurisdiction and the region of foreign-born persons identify, Mexico as their national origin. Maps of the jurisdiction show the highest concentrations of foreign-born persons in the eastern and southeastern portion of the jurisdiction. Again, the labor market indexes in these areas are lower than the surrounding areas, especially compared to those western parts of the jurisdiction and areas outside of the jurisdiction, except for portions of Council Bluffs. Within Omaha the areas with the lowest labor market indexes also have the highest populations of protected classes.
Moreover, if a portion of the labor market index is measured by how many persons in an area have a bachelor’s degree, it is important to consider the overall educational achievement in a neighborhood. The maps above are based on data from the American Community Survey (ACS) 5 year survey. This survey produces information from 60 months of US Census data for social, economic, housing, and demographic issues. Areas to the far northeast and southeast of Omaha show lower levels of education and higher levels of unemployment. Both factors impact the labor market index and overall “human capital” in an area. These maps along with the Labor Market Index indicate that areas with low educational attainment correlate with reduced engagement in the workforce and households who live within these areas face subpar educational opportunities which in turn narrow employment opportunities.
Figure V-64 Regional Job Proximity Index

Source: HUD Map 8 Job Proximity; The map above provides a view of the regional job proximity index. Census tracts with lower job proximity index numbers are lighter in color, and as those numbers increase, the shade of grey becomes darker.

At both the regional level and individually at jurisdictional level, scores on the Job Proximity Index are mediocre at best, regardless of race or jurisdiction there were no scores at or above 60. The census tracts within Omaha and directly outside of the jurisdiction have a large range of job proximity index ratings, yet both the highest and lowest job proximity ratings are found within Omaha. Within Omaha, areas with lower job proximity scores can generally be found dispersed along the western, southwestern, and southeastern edges of the city. However, the most noticeable concentration of lower job proximity scores appear in a large area located in the northeast quarter of the City.
Race and Ethnicity

Figure V-65 Race/Ethnicity and Regional Job Proximity

Source: HUD Map 8 Job Proximity

Figure V-66 Race/Ethnicity and Omaha Job Proximity

Source: HUD Map 8 Job Proximity, White Demographic Removed, Dot Density 1:50
When the location of Racial and Ethnic households are compared to areas of high and low job proximity, we find that while all household types live in areas of both high and low job proximity, there are noticeable correlations between household type and distance to regional employment opportunities.

White households living along the northwestern and southwestern edges of the jurisdiction are more likely to experience lower job proximity, while some concentrations of Hispanic households in the southeastern corner of the city are also exposed to areas of low job proximity. Notably, in the contiguous area of low job proximity located in the northeastern quarter of the city, while inhabited by a mix of household types, there is a very noticeable overlap of concentrations of Black households and several R/ECAP tracts. This may explain why the Job Proximity Index showed very little variation in scores for Black households living above and below the poverty line—they often live in close proximity and experience lower proximity to regional employment. This contiguous area of low proximity to employment could be seen as a bubble within a city otherwise teeming with employment, and as a consequence households living in this area likely face longer commute times, and greater transportation related expenses.

National Origin

**Figure V-67 NE-IA Region National Origin and Job Proximity**

![Image](image-url)

Source: HUD Map 8 Job Proximity

**Figure V-68 Omaha Council Bluffs National Origin and Job Proximity**
Comparison of jurisdiction and regional job proximity does not show a significant trend for foreign born households. However, the job proximity index does not show the types of jobs available in each Census tract.

Although the majority of foreign-born persons within both the jurisdiction and the R/ECAP are from Mexico, the job proximity index varies in the census tracts within the jurisdiction. Areas with both high and low job proximity index have concentrations of persons from Mexico and other national origins.

Figure V-69 Omaha Employment Centers & Census Tracts with High Unemployment
Although HUD Map 8 and Table 12 Job Proximity Index shows little difference in job proximity throughout Census tracts and between race/ethnicity across Omaha, the index does not take into account the number of jobs available. The map above focuses on the number of employees per employment center and their location to Census tracts with 15% unemployment or higher. The employment centers listed all have fifty employees or more.

Although are some large employment centers in Downtown Omaha and a few in the southeastern portion of the city, the majority of employment opportunities appear to be along the Dodge Street corridor and in Southwest Omaha. There are very few employers with more than 50 employees in Northeast Omaha. Conversely, the majority of Census tracts with high unemployment rates are located in Northeast Omaha. The areas with the highest unemployment also have large numbers of minority households, which suggests that the location of larger employers is impacting protected classes.

COUNCIL BLUFFS
The Labor Engagement Map for Council Bluffs shows the areas with the highest availability for labor engagement in US Census Tracts 301, 309, 311, 313 and 315. These areas coincide with the City’s main business park areas and schools. Unfortunately, the areas adjacent to the business parks have low residential usage and few residents. However, Council Bluffs and the Metro overall, is small enough that the average commute time is 18.6 minutes. This accounts for 43.1% of the population that work in a different state of residence—typically Nebraska.

According to the US Census, industries with the highest number of employees include educational services, and health care and social assistance (22.8%); retail trade (13.3%); and manufacturing (11.7%).

**Figure V-70 Council Bluffs Jobs Proximity Index**

Source: HUD Map 8 Job Proximity

**BELLEVUE**

As previously noted, most Bellevue has job proximity indexes of 40 to 50. The job proximity for household along the transportation and commercial corridors of Highway
75 which is the major thoroughfare into the Omaha metro area and State Highway 370 which runs east to west and leads to Offutt Air Force Base shows to be slightly higher than the surrounding area. HUD Map 8 shows the job proximity by race/ethnicity. The areas in northern Bellevue are located further from major employers and therefore have lower job proximity. These areas are also further away from public transportation routes.

**Figure V-71 Bellevue Job Proximity and Race/Ethnicity**

Offutt Air Force Base plays a huge part in the city’s employment numbers in addition to housing opportunities for those serving in the armed services which is indicated by the high job proximity indexes closer to the base.

Most of the national origin households are in lower job proximity index areas. This is also true for households with families.
Job proximity is likely to have an impact on employment opportunities. The residents that are dependent on affordable transportation to and from employment centers have been more constrained. Currently, Bellevue has one public transportation route to employment centers in the Omaha metro area which limits the amount of accessibility to these areas.

As shown in the HUD map, most areas of Bellevue have high labor market engagement indexes, but the lowest areas appear to be Offutt Air Force Base and military housing areas. This could be a result of the inclusion of labor-force participation and bachelor degree percentages in the Labor Market Engagement Index.

Higher numbers of families with children can be found in the census tract with military housing located in southwest Bellevue.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.
The map shown above, created using LEHD data, shows the location of employment centers in Omaha and the following maps show areas with high concentrations of Black and Hispanic employees. Major employment centers can be found in downtown (east-central) Omaha, and western and southwestern parts of the city. Other areas of high employment can be found extending from downtown to the west and southwest, as well as along the highway 680 in the northeast and near the airport in the northeast.
Source: 2014 LEHD; 2016 ACS; The map above shows the concentration of employees who identify as Black or African American in Omaha

Figure V-74 Hispanic and/or Latino Identifying Employees Omaha
The map above shows the concentration of employees who identify as Hispanic or Latino in Omaha.

In contrast, the highest concentration of Black employees is located in the northeast, and the highest concentration of Hispanic employees is found in the southeast. This information correlates with the HUD’s Job Proximity map and highlights the lack of employment in northeast Omaha and the low proximity to jobs that many Black and Hispanic employees face, a burden shared by many living in nearby R/ECAP areas. Moreover, in addition to the spatial distribution of employment and employees, industry type and educational attainment should be considered, as many of the jobs that residents in the northern and southern parts of the city qualify for, may be located in west and southwest Omaha. As Heartland 2050 points out in the Fair Housing Equity Assessment, about half of jobs closer to the northeastern and southeastern Omaha are in downtown, jobs are largely high skilled jobs - for example, Public Administration (18%), Finance and Insurance (17%), and Professional, Scientific, and Technical Services (14%) - and require higher educational attainment. Essentially, due to lower educational attainment, spatial distribution of employment opportunities, and lack of
reliable transportation, many Black and Hispanic households living in eastern Omaha likely face additional hurdles finding and maintaining employment.

Regardless of the attribution, people of protected classes face measurable disparities in regards to employment. According to 2014 ACS data, The unemployment rate for the city rests at 7.3%, 5.9% for White households, and 3.6% for Asian households. Yet, most other racial groups face unemployment rates of 10% or greater with American Indian/Alaska Native households and Black households showing unemployment rates above 15%. For those who are employed, the annual median income for households living in Omaha is $48,751, and White households enjoy a higher Median income of $54,177. In comparison median income for Hispanic households falls to $37,522, while the median income for Black households is $26,076 - nearly half of the median income for all families living in Omaha. The disparities between racial groups in regard to unemployment and income are also reflected in the city’s poverty levels. 16.8% of the Omaha’s population lives below the poverty level, 43.8% of whom are employed. Along racial and ethnic lines, 12.4% those who identify as White live below the poverty line, while all other racial and ethnic groups have between 23% and 42.5% of their respective populations living in poverty.

Disability Community

According to disability population statistics for Douglas County, Nebraska based on 2005-2007 ACS PUMS data, disparities exist in the area of employment. Unemployment for persons ages 16 to 64 with a disability participating in the workforce is at 9.1 percent compared to ACS data for the same time period in the general population of Douglas County at 6.4 percent. The same ACS data also shows that 15 percent of persons ages 21 to 64 with a disability have a Bachelor’s degree or higher, compared to 35 percent of the general population ages 25 year or over in Douglas County. Information from the Nebraska Disability Status Report based on 2010 ACS data indicates that statewide, the median earnings of people with a disability of working-age and employed full time was $30,200 compared to an average of $38,000 statewide for individuals without a disability.

Stakeholders in the employment community (Employers), mentioned not being able to fill a range of jobs including skilled constructors, administrative support, and technology based positions. They found that a variety of skills were lacking in prospective employees ranging from typing, and basic math to soft skills and understanding of technology. Additionally, employers identified lacking transportation and availability of childcare as key encumbrances to employee retention. Additionally, personal issues like poor mental health, poor physical health, and substance abuse were noted as
issues which hindered employment. In regards to RE\CAP areas employers specifically mentioned that these areas lack a skilled workforce. These responses seem to align with much of what both local data and HUD’s data portrayed and point to both spatial and educational mismatches between local employment opportunities and potential employees.

COUNCIL BLUFFS

While the City of Council Bluffs has enjoyed numerous successes over the last five years, we have also experienced 0% growth rate in our overall population, a flood in 2011 that devastated areas of the City and continues to be a financial hardship on both the City and numerous homeowners in the west end of Council Bluffs. In addition, attracting new businesses to Council Bluffs has been difficult due to the commercial property tax variances between the City of Council Bluffs and Omaha, NE.

Retail options for Council Bluffs residents have expanded over the past decade with new development of over one million square feet of retail space collectively at Metro Crossing and The Marketplace. However, the downside of this growth has been its negative impact upon Mall of the Bluffs. With over 75 storefronts, only 14 are currently occupied today. Other retail closures include Shopko which closed in 2017. Griffin Pipe, a large manufacturing company reduced its staff in 2015 laying off over 250 employees. In the last five years, it is estimated 370 jobs have been lost.

Council Bluffs Municipal Code for employment discrimination is outlined in 1.40.080 stating that any firm within Council Bluffs must adhere to the antidiscrimination requirements set forth (Attachment H). Municipal Code 1.40.140 also outlines retaliation guidelines under the discriminatory practices clause.

BELLEVUE
Bellevue has one major employer for the region which is Offutt Air Force Base. Most of the employment centers are located outside of the city limits which requires commuting.

Table V-26 Bellevue Employers

<table>
<thead>
<tr>
<th>Employer</th>
<th>Industry</th>
<th>Employees (approx.)</th>
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</thead>
<tbody>
<tr>
<td>Offutt Air Force Base</td>
<td>Military</td>
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</tr>
<tr>
<td>Bellevue Public Schools</td>
<td>Education</td>
<td>1,500</td>
</tr>
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<td>Bellevue University</td>
<td>Education</td>
<td>650</td>
</tr>
<tr>
<td>Hillcrest Health Systems</td>
<td>Senior Care</td>
<td>650</td>
</tr>
<tr>
<td>Walmart</td>
<td>Retail</td>
<td>500</td>
</tr>
<tr>
<td>City of Bellevue</td>
<td>Government</td>
<td>420</td>
</tr>
<tr>
<td>Nebraska Medicine Bellevue</td>
<td>Medical</td>
<td>400</td>
</tr>
</tbody>
</table>

Source: Bellevue Chamber of Commerce

Stakeholders expressed that the majority of Bellevue residents provide their own transportation to employment and live in the community for the opportunities provided such as schools, safety services, and the sense of community.
c. Transportation

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

Transportation Index Score Tables

HUD provides the Transit Index and the Low Transportation Cost Index to help gauge transportation infrastructure. The Transit Index (V-27) estimates how often public transportation is used by families and is used by HUD as measure of access to transit. Higher scores on the Transit Index indicate greater public transportation use. HUD’s Low Transportation Cost Index (Table V-28) is an estimate of household transportation costs, higher scores on this index indicate lower transportation costs. Both indices are based on data from the 2008-2012 Location Affordability Index (LAI) and are used to paint a general picture of transportation costs and transit use for the entire country.

Figure V-27 Regional Transit Index

<table>
<thead>
<tr>
<th>Transit Index Scores</th>
<th>(Omaha, NE CDBG, ESG) Jurisdiction</th>
<th>(Bellevue, NE CDBG) Jurisdiction</th>
<th>(Council Bluffs, IA CDBG) Jurisdiction</th>
<th>(Omaha-Council Bluffs, NE-IA) Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>35.71</td>
<td>30.31</td>
<td>31.89</td>
<td>28.43</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>37.77</td>
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<td>33.40</td>
<td>35.42</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>38.8</td>
<td>29.17</td>
<td>32.88</td>
<td>35.69</td>
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<tr>
<td>Hispanic</td>
<td>38.12</td>
<td>30.48</td>
<td>32.08</td>
<td>34.10</td>
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<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>35.85</td>
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<td>Native American, Non-Hispanic</td>
<td>35.7</td>
<td>30.44</td>
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<td>31.91</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

While the region as a whole has low scores on the Transit Index, Omaha has by far the most robust public transportation system in the region and has the highest transit index scores as well, consistently scoring higher than the regional average. Additionally compared to the region, White households show the lowest Transit Index scores, this is likely due to a large number of White households living outside of urban areas who do not have access to public transportation.
OMAHA

Within Omaha, White households are shown to use public transportation the least and score about two to three points less than other ethnic groups on the Transit Index, all other groups only vary about one point from each other. While those who fall below the federal poverty line are shown to use public transportation more often compared to the population as a whole, Black households living below the poverty line showed the least public transportation use as well as the smallest increase in public transportation use compared to their counterparts above the poverty line.

Figure V-28 Regional Low Transportation Cost Index

<table>
<thead>
<tr>
<th>Low Transportation Cost Index Scores</th>
<th>(Omaha, NE CDBG, ES) Jurisdiction</th>
<th>(Bellevue, NE CDBG) Jurisdiction</th>
<th>(Council Bluffs, IA CDBG) Jurisdiction</th>
<th>(Omaha-Council Bluffs, NE) Region</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Population</strong></td>
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<tr>
<td>White, Non-Hispanic</td>
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<td>Black, Non-Hispanic</td>
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</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

HUD’s Low Transportation Cost Index also shows that Omaha has the lowest transportation costs in the region, and consistently scores higher than the regional average. Again, White households show the greatest variation in transportation costs compared to the region, which is likely due to the large number of White households living outside of urban areas who likely have longer commutes and who do not have access to public transportation.

For the total population in Omaha, White households have the highest transportation costs. All household living below the poverty line show lower transportation costs than the total population. Yet among those who fall below the federal poverty line, Black households have the highest transportation costs and only show a minimal improvement in transportation cost when compared to their counterparts above the poverty line.
Both the Transit Index and the Low Transportation Cost Index show that Omaha’s total population as well as its population living below the federal poverty line scores higher than the regional average on both measures. This indicates that the city of Omaha has higher quality transportation infrastructure compared to other cities in the region and the region as a whole. The tables also indicate that, those living below the federal poverty line in Omaha are more likely to have lower transportation costs and use public transportation more often compared to the city’s total population. Yet of the racial and ethnic populations living below the federal poverty line, Black households had the lowest transportation use, highest transportation costs, and showed less than a one point increase on both indices, a much lower variation compared to other ethnic groups. This indicates that Black households, particularly households living below the poverty, likely face additional transportation burdens.

COUNCIL BLUFFS

According to Table 12, transportation costs for metro residents are similar for all races. The Low Transportation Cost Index indicates the population below the poverty line spends a higher percentage of income on transportation. Proximity to jobs is similar for all races and economic classes across the board.

Lack of adequate public transportation continues to be an issue in Council Bluffs. In 2016, bus routes were modified to provide more stops along the most utilized routes. This change made little impact on the number of riders utilizing the system.

BELLEVUE

Bellevue has very limited availability of public transportation which could account for the low transit trip indexes. The Transit Trips Index reflects this fact with low values for all race and ethnicities. For the total population, the Transit Trip Index is around 30 for all races and ethnicities. The index drops slightly for the average population living below poverty. The Black population living below poverty utilizes public transportation more than the total population of Blacks while Native Americans living below the poverty line utilize public transportation significantly less than the total population of Native Americans.

The lack of public transportation and low job proximity could cause the increase in transportation cost. Bellevue’s low transportation cost index ranges from 60-62 for all race/ethnicity of the total population. Hispanic and Native Americans living below the poverty line face higher transportation costs than their total population counterparts.
ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

**OMAHA**

**Transit Trips**

HUD Maps 1 and 2 both relate to HUD’s Transit Index and show how often low-income families in a neighborhood use public transportation. These maps imply that the areas with the highest public transportation use are located primarily in East-central Omaha along with high levels in the Northwest, while a noticeably lower level of public transportation use can be observed in the Southwestern parts of the city.

**Figure V-75 Comparison of Transit Trips and Race/Ethnicity**

Source: HUD Map 10 Demographics and Transit Trips
When viewing HUD Map 1, it is immediately noticeable that there are concentrations of racial and ethnic groups in northeastern and southeastern Omaha. In the Northeast there is a large concentration of Black households and in the Southeast a large concentration of Hispanic households. The concentration of Black households in the Northeast coincides with areas that have lower transit trip scores for the city (30-40), and may explain why these households are shown to use public transportation less in
the Transit Index. In the Southeast the concentration of Hispanic households is aligned with a mix of both low scoring and above average scoring areas, which may explain why they are shown to have relatively higher public transportation use.

Figure V-76 National Origin and Transit Trips

![Map showing National Origin and Transit Trips](Figure_V-76.png)

Source: HUD Map 10 Demographics and Transit Trips

HUD Map 2 shows that people with Mexican, El Salvadoran, and Guatemalan origin are clustered in areas in the south and southeast which generally align with areas of average and above average usage of public transportation when compared with the rest of the city.

Both HUD Maps 1 and 2 show a general misalignment between R/ECAP areas and higher public transportation use. All nine of the areas R/ECAPs are located in eastern Omaha, Seven of these areas are located in northeast Omaha, five of which have average transit trip scores compared to the city as a whole. Additionally, these seven R/ECAP areas overlap with concentrations of Black residents, which have been shown to use public transportation least among those who fall below the federal poverty line. The remaining 2 R/ECAPs, located in the midtown area just outside of the downtown core and in southeast Omaha, coincide with areas which had low and above average scores on the transit trips index compared to the rest of the city. These maps indicate that in the majority of R/ECAP areas public transportation is utilized at an low rate.
compared to the rest of the city, and that public transportation use by low income households is generally highest in and around the downtown core.

Low Transportation Cost

Both HUD Maps 3 and 4 depict low transportation costs throughout the city. The areas with the lowest transportation costs are generally located in and around the city's urban core, with other areas of low transportation cost appearing along highways and major arterials, as well as in close proximity to employment centers. Areas of higher transportation cost are located in the northeast, south central, and the westernmost areas of the city.

Figure V-77 Transportation Cost and Race/Ethnicity Omaha

Source: HUD Map 3 Transportation Cost Index and Race/Ethnicity

HUD Map 3 focuses on racial and ethnic distributions in relation to the Low Transportation Cost Index.

HUD map 3 shows, both Black households in the north Omaha and White households in the westernmost edges of the City carry the some of the highest transportation costs. The concentration of the city’s Hispanic households in the Southeast coincides with a patchwork of different levels of transportation costs. Asian/ Pacific Island households
are generally clustered throughout the city in lower transportation cost areas.

**Figure V-78 Transportation Cost and National Origin Omaha**

Map 4 depicts national origin and transportation cost throughout the city. People with Mexican origins cover a spectrum of transportation cost levels in the southern and eastern parts of the city. Similarly, people with origins in El Salvador and Guatemala are spread throughout the south and east of the city occupying a range of transportation cost areas. While spread throughout the city, those with origins in India are mostly clustered in low transportation cost areas. People with origins in Thailand are clustered throughout the city, yet there are significant pockets of this population in north and northeastern Omaha who are subject to higher transportation cost compared to the rest of the city.

Both maps show that R/ECAP areas are split between high and low transportation cost areas. R/ECAPs in close proximity to downtown and in southeastern Omaha show lower transportation costs. However three R/ECAPs in northeastern Omaha show higher transportation costs compared to the rest of the city. This difference in transportation costs is likely due to less public transportation use as well as higher costs associated with a greater proximity to jobs and other daily resources for households living in the later R/ECAP areas.


**HUD Map Conclusion**

Overall HUD’s Low Transportation Cost Index and Transit Trips Index show that, in Omaha, the areas with highest use of public transportation are generally in and around the Downtown and Midtown with other areas of noticeably high use located in the northwest and south western parts of the city. Areas with low transportation cost extend from downtown through central Omaha to the west and northwest of the city, leaving areas with higher transportation costs located in the Northeast, along the western edge, and scattered through the southeastern parts of the jurisdiction.

Except for areas closest to the downtown core, concentrations of Black households in northeast Omaha overlap with areas of lower public transportation use and higher transportation costs. Hispanic households and households originating from Mexico and Guatemala which are concentrated in the southeast overlap with areas of lower and above average public transportation use, and areas of both lower and high transportation costs. Further, many R/ECAP areas are shown to have higher transportation costs and an average use of public transportation when compared to the rest of the city, while R/ECAP areas adjacent to Downtown and Midtown show lower transportation costs and higher public transportation usage.

**COUNCIL BLUFFS**

In Council Bluffs, public transit is less developed than other portions of the metro area. The Transit Trip Index illustrates the West End, Mid-City and Downtown areas have the highest access to public transit. Council Bluffs continues to partner with agencies to increase access to public transportation but it is a work in progress. Currently Metro Area Transit (MAT) has two fixed routes within Council Bluffs:

1. West Broadway to Metro Crossing, Market Place and the Mid America Center and
2. West Broadway to the Lakin Human Services Campus, Iowa Western Community College and Mall of the Bluffs.

Additionally, Southwest Iowa Transit Agency (SWITA) offers paratransit (on demand) service. In 2017, the City began contracting with SWITA to provide paratransit and taxi services.

SWITA also provides two “work routes” that provide round trip transportation to specific companies in the area:

1. Menards Distribution Center in Shelby, Iowa. The route is available between Atlantic, Council Bluffs and Shelby Monday through Saturday for all three shifts.
(2) OSI in Oakland, Iowa. This route is available between Omaha, Council Bluffs and Oakland seven days a week for the 5:00 am shift. It is also open to the public with a round trip costing $7.00.

BELLEVUE

Overall, Bellevue has very low access to transit which means all race/ethnicity and national origin households face a higher cost for transportation. This is also true for the region. National Origin households have higher transit trips indexes overall since most households are in northern Bellevue. Households with children in southern Bellevue have slightly higher access to public transportation than the household in north center Bellevue.

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

OMAHA

HUD’s indices were developed to depict information for the entire country, and unfortunately can overlook important information at the local level. The Transit Trips and Transportation Cost indices are no exception. The Transit Trips Index, is an estimate of transit usage based on self-reported trips to work by a narrowly defined group of low income households. It does not account for actual existence of transit routes or the frequency of service, yet it is used to estimate access to transit. While in larger, denser urban areas this index may be useful in identifying the location and intensity of public transportation usage, in the Omaha-Council Bluffs Region this measure is less accurate. The Transportation Cost Index is hindered at the local level because scores are percentile ranked nationally, which overlooks how affordable or unaffordable transportation is as a percentage of household income.

Table V-29 Vehicle Ownership Rates by County
Local data shows that, as with most American cities, the automobile has had an unprecedented impact on Omaha’s urban form. Omaha began orienting its streets to car travel in the 1920s and by 1960, travel within the city was predominately by car. This mode of travel was a catalyst for Omaha’s expansion, allowing families to move from the dense urban center into new suburban subdivisions. This suburban growth was further facilitated by the development of the Interstate Highway System, which allowed for faster travel over longer distances, and both federal and local policies which incentivized development of communities further from the urban core. (Transportation Element, p.7; Mirror Mirror p.201)
With its physical expansion increasing twice as fast as population growth, Omaha has excelled at low density, auto-centric growth. As a result, today approximately 92% of commutes to work are by car and 82% travel alone.

Figure V-80 Omaha R/ECAPs and Employment Density
While transportation is important to accessing many resources throughout the city, there is little doubt that employment is one of the most important resources for any household. Map 5 shows the concentrations of employment which have developed within Omaha and highlights these concentrations in relation to R/ECAP areas. Generally, employment is most heavily concentrated in downtown, central, western, and southwestern Omaha. Additionally, there are contiguous areas of high employment which extend from the downtown area westward and connect the most heavily concentrated areas.

For the most part, R/ECAP areas about the City’s downtown employment core and extend outward to the north and south. While R/ECAP areas can be said to have a reasonable proximity to downtown employment, there is an obvious separation of R/ECAP areas from the other employment centers in the western and southwestern most parts of the city. This mismatch between employment and R/ECAP areas indicates that there are spatial barriers and higher costs to accessing and maintaining employment for people living in and around these areas, especially as the city has become reliant on car ownership for transportation.
When Omaha’s weekly public transportation routes are compared to employment areas (Map 6), it becomes clear that there is good (15 minute frequency) transit service linking the eastern parts of the city to Downtown and central employment centers. Outside of this area, service drops to a much less reliable 30 minute frequency, reaching additional concentrations of employment in the west and southwestern areas of the city. Unfortunately, the fringes of the city, including some of the western and southwestern most areas of employment, have limited service (1 hour or greater frequency) at best.

There are additional characteristics of Omaha’s public transportation system to consider, along with what is depicted in the preceding maps. Omaha’s public transportation services vary in frequency throughout a given day, many routes fall below the depicted peak frequencies, in the evenings, outside of peak hours, and additionally, many transit trips require one or more transfers which can add substantial wait times and extend total travel time. Moreover, on Saturdays transit service is reduced to 30
minute frequency at best, many routes which run at 30 minute frequency during weekdays are reduced to hourly intervals, and several routes are not provided. On Sundays service is further reduced only four routes provide 30 minute service, most routes run on a hour or greater frequencies, and even more routes are discontinued.

When the city’s transit system is analyzed it becomes apparent that there are gaps in service and many areas which lack reliable service, especially on weekends and outside of peak hours. In general, public transportation is best in eastern and central Omaha, while coverage and service frequencies atrophy throughout the suburban reaches of the City. This means that while R/ECAP areas may have good access to transit, the usefulness of transit is limited to eastern and central Omaha which limits access to more suburban opportunities. These shortfalls in service likely have a greater impact on the city’s most vulnerable populations, people living in and around R/ECAP areas and those who cannot afford a car. This being said, Omaha’s public transit provider (Metro) may be among the most efficient transit agencies in the country. Metro, has done a lot with tight fiscal constraints, which are partially a result of a cap on its tax based income. According to MAPA’s 2013 Heartland Connections Regional Transit Vision, Metro receives less than half of the national average for transit funding per person. This below average level of investment in public transit no doubt impacts Metro’s ability to provide quality service throughout Omaha and the greater metropolitan area.

Figure V-82 Investment in Transit Per Capita
Community Feedback

Community Feedback reinforced many of the issues surrounding transportation mentioned above. When asked what modes of travel people use to get to work, 93% of those surveyed said that they travel to work by automobile, while 7% said they commute using METRO bus service and about 12% said that they walk or cycled to work. Other than having access to a car and personal preferences, survey respondents mentioned long commutes (30%), infrequent service (22%), and lack of connectivity (25%) as reasons for not using public transportation. More than 35% of respondents noted typical trips by bus took greater than 30 minutes, and just over 10% said that typical bus trips take more than an hour. So it is no surprise that, following close behind votes for increased awareness of fair housing issues (20%) and increasing affordable housing in close proximity to where people work (20%), 18% of those surveyed said that federal dollars should be spent on public transportation in order to address fair housing issues. Moreover, meetings with stakeholder groups identified a lack of affordable housing near public transportation as a key fair housing issue in the region. Stakeholder sub groups also identified transportation to jobs, limited public transportation after hours and on weekends, limited public transportation options in low income areas, and a lack of transportation funding as prevalent issues facing the city.
According to the US Census American Community Survey, 83.8% of the workforce own their vehicle. This is up from the 2000 Census which stated 81.8% owned their own vehicle. Only 1.1% of the population utilizes public transportation for commuting to work.

Main concerns fielded from the public were related to transportation and busing not available in employment corridors or ending before third shift. The City has worked to relocate many of the industrial-type businesses to the south along Veterans Memorial Highway away from residential corridors. This has created an area where public transportation struggles. Additionally, many of Council Bluffs residents work in Omaha and are required to commute to areas where public transit does not connect or is time prohibitive.

Figure V-83 Council Bluffs Metro Area Transit Routes

Source: www.ometro.com
The 2011-2015 American Community Survey reported 84.7 percent of the labor force commuted alone to work with a mean travel time of 20.7 minutes. Only 17.2% occupied households have access to one vehicle and 1.3 percent of households do not have a vehicle available. Those with access to two or more vehicles make up 45.2 percent of occupied households, and three vehicles or more is 36.1 percent. To commute to work, 84.7 percent drive alone, 11.3 percent carpooled, 0.1 percent used public transportation, 0.7 percent walked, 1 percent use taxicab, motorcycle or other means, and 2.2 percent work from home.

**Figure V-84 Bellevue Express Route 95**

To help address any transportation needs, the Omaha Metro public transportation system provides one route through Bellevue. The Bellevue Circulator Express, or Route 95, runs through the city limits and provides service to Downtown Omaha, Metro College Transit Center (MCTC), Metro Community College - South Campus, Downtown Bellevue, Bellevue Plaza and Bellevue University. Below is a map showing this route.
The public transportation route runs through the older part of the community that is already well established and with limited open land available for new development. The area also has more affordable housing which is close to transportation, services, and job centers. In Bellevue, public transportation possesses an impediment. Most services are offered in Omaha, such as the VA Medical Clinic. The only public transportation loop provided only runs twice a day so those individuals must depend on other modes of transportation that may not be as affordable.

The City of Bellevue operates a Specialized Transportation Bus Service. This service is a limited senior and disabled transportation program, which offers door-to-door service in the Bellevue and Omaha area Monday through Friday. For this service, elderly must call in advance and pre-register for transportation services for a minimum fee, but it limited to daytime hours from 8 a.m. to 4:30 p.m.

Community input reiterated the desire to reside in Bellevue comes with the knowledge that the majority of work transportation must be done by personal car due to the lack of public transportation and the limited number of job centers located within Bellevue.

**Conclusion**

People of color and low-income residents in the Omaha Metropolitan area, as well as those living in Racially/ethnically-concentrated areas of poverty (R/ECAPs) have access to public transportation. However, service to suburban employment centers and areas of job growth in the metro area is limited. Past public policy coupled with a car-focused real estate market has encouraged the movement of jobs from the urban core westward to the suburban edge. This in turn has created a spatial mismatch where, those living in eastern Omaha, including those in R/ECAP areas, are separated from employment and other opportunities farther out. Because of fragmentation, the public transportation system has not been able to make strong connections between R/ECAP areas and suburban opportunity. In addition, in its current form, the public transportation system has lost influence on real estate market decisions to create favorable development patterns that allow for higher employment levels in and near R/ECAPs areas.

This said, a community conversation recently began around elevating the region’s transit system, fostering stronger connections between areas of concentrated poverty and people of color to opportunities, and more importantly how to foster development patterns suitable to return jobs in and around R/ECAP areas which have been lost over the past fifty years. Two projects which will begin this process are already underway; a Bus Rapid Transit line along Omaha’s main corridor (Dodge Street) which is expected
to be completed in 2018, and a Modern streetcar line connecting the city’ Downtown and Midtown districts which is currently in final design.

Introduction

*Regional Versus Jurisdiction Analysis*
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

**Omaha**

**Council Bluffs**

**Bellevue**

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- **OHA**
Douglas County Housing Authority- **DCHA**
Council Bluffs Municipal Housing Agency- **MHA**
Bellevue Housing Authority- **BHA**

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair
housing analysis. All tables and data can be accessed online at: https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
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<td>R/ECAP</td>
<td>R/ECAP</td>
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</table>
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

• **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
• **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
• **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
• **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
• **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
• **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

41. Downtown: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
42. Mid-City: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
43. Bluff-Willow: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
44. Kanesville-Tinley: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
45. North End: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
46. West End: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
47. South End: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
48. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
49. Lake Manawa: subdivisions east of Lake Manawa
50. East End: newer area to the east of Bluff-Willow and the North End to the city limits

BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

d. Access to Low Poverty Neighborhoods
For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

According to the AFFH Rule Guidebook, the Low Poverty Index measures the poverty rate by neighborhood. The index incorporates the family poverty rate of a census tract and how many households within that tract receive public assistance. The higher the number more likely it is that a family may live in a low poverty neighborhood, the lower the number, the more likely it is that the family is living in a neighborhood with a higher rate of poverty.

Table V-30 Regional Low Poverty Index

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<td>32.94</td>
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</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Across the region, White and Asian/Pacific Islander households have a significantly higher chance of living in a low poverty neighborhood compared to all other race/ethnicity categories when comparing residents who live both above and below the poverty line. Black, Non-Hispanic families live in neighborhoods with the highest rates of poverty, followed by Hispanic and Native American Households.

OMAHA
According to HUD table 12, low-poverty index, in the Omaha jurisdiction is very similar to the regional data in terms of the race/ethnicity of the households who are most and least likely to live in low-poverty neighborhoods. One difference however, is that all races and ethnicities both above and below the poverty line have a lower index in Omaha, suggesting that there are more households who have less access to low-poverty neighborhoods. The difference between the Omaha jurisdiction and the region is greater for those living above the poverty line. Below the poverty line there is a greater difference for White and Hispanic households than across the region, but White households still have the highest index over all.
According to Table 12, Council Bluffs’ residents of all races and ethnicities have similar access to low poverty neighborhoods. The low percentages of non-white residents is reflective of this number. As related to families living below the poverty line, Council Bluffs has a larger disparity with Non-Hispanic (56.67) and Asian or Pacific Islander, Non-Hispanic (61.00) significantly more likely to be below the federal poverty line than any other race/ethnicity.
In HUD AFFH Table 12, HUD provides the Low Poverty Index which measures concentration of poverty by neighborhood. The higher value on this index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value indicates the group has a higher likelihood of living in neighborhood with higher concentration of poverty.

**Figure V-33 Bellevue Low Poverty Index by Race/Ethnicity**

<table>
<thead>
<tr>
<th>Population</th>
<th>Low Poverty Index</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Bellevue</td>
</tr>
<tr>
<td><strong>Total Population</strong></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>62.65</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>61.34</td>
</tr>
<tr>
<td>Hispanic</td>
<td>58.69</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>61.04</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>56.98</td>
</tr>
<tr>
<td><strong>Population below federal poverty line</strong></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>51.64</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>34.88</td>
</tr>
<tr>
<td>Hispanic</td>
<td>61.35</td>
</tr>
</tbody>
</table>
Asian or Pacific Islander, Non-Hispanic | 55.76 | 47.89
Native American, Non-Hispanic | 61.98 | 32.94

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

The total population of Bellevue has a higher likelihood of living in neighborhoods of lower poverty. The close range of the values indicated that no race or ethnicity faces a higher likelihood of living in a low poverty neighborhood.

The Black population living below the poverty line have a significantly higher likelihood of living in neighborhoods with higher concentrations of poverty. While Hispanics and Native Americans living below the poverty line are more likely to live in an area of low poverty.

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

OMAHA

Figure V-85 Omaha Low Poverty Index
The poverty index map above shows the distinct change in poverty index moving from West (left) to East (right). Eastern Omaha neighborhoods have much lower poverty index scores than those neighborhoods in the West. The map below includes the demographics layer for the low poverty index map.

Census tracts in the Northeast and Southeast Omaha have higher percentages of minority households and LEP families than those to the west.

**Figure V-86 Omaha Race/Ethnicity and Low Poverty Index**

When focusing in on Northeast and Southeast Omaha, where the census tracts with the lowest Low Poverty Index scores are found, the demographics layers show how protected classes are impacted. Minority and LEP households are found in greater numbers in the census tracts with the lowest index scores. These protected classes
have less access to low poverty neighborhoods than the majority white neighborhoods in the western portion of the City.

**Figure V-87 Omaha Neighborhood Diversity**

![Map showing Omaha Neighborhood Diversity](image)

Source: 2014 American Community Survey (ACS) Data

As mentioned in the Segregation/Integration section above, mapping census tracts by percentage of white versus non-white residents reveals where the most homogenous neighborhoods are located in Omaha, and those with the most diversity. The same neighborhoods to the far West of Omaha with less than 10% of minority households also have the highest index for low poverty. Similarly, those neighborhoods to the far Northeast and Southeast have the lowest index for low-poverty.
Map 12 shows the disparities in access to high poverty neighborhoods. In Council Bluffs, the highest poverty neighborhoods are located in US Census Tracts 306.02, 309, 311 and 313, which range in poverty index from 7 to 18. These census tracts include Mid-City, the West End, the South End and a small portion of the East End. These
areas primarily consist of White/Non-Hispanic because Council Bluffs has a very low diversity rate. For national origin, there are small clusters of native Mexicans within Census Tracts 311 and 306.02. Additionally, 40-60% of the households have children, which suggests a large number of children within these census tracts are living at or below the federal poverty line.

**BELLEVUE**

HUD AFFH Map 12 show values for the Low Poverty Index with shading at the census tract level.

**Figure V-89 Bellevue Low Poverty Index**

Source: HUD Map 12 Low Poverty Index

Bellevue has one area of low poverty in southeast Olde Towne area. The families with children and all race and ethnicities face living in neighborhood in high poverty. Most families with children live in areas of low poverty.
iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

OMAHA

A contributing factor to fair housing identified through HUD information, local data, and the community engagement, is the location and lack of affordable housing in Omaha. Most low poverty census tracts are located in West Omaha. The lack of affordable housing to the west of 72nd Street limits the ability of some protected classes currently located in R/ECAP areas from accessing low poverty neighborhoods. The concentration of affordable housing east of 72nd also limits persons in the disability community who are on Supplemental Security Income (SSI) and/or elderly persons on fixed income from having more housing choice.

As mentioned in previous sections, growth patterns westward based on geographic boundaries and policies within Sanitary Improvement Districts (SIDs) contribute to the development of new and high end housing in the western portion of the city. Additional codes mentioned in Segregation/Integration (Section 2e), requiring developers to hold meetings with stakeholders including neighborhoods on projects that include affordable housing may create barriers to the addition of new low-income or mixed-income developments in the western portion of the city.

An activity incorporated into community open houses held across the city included a station where residents could select solutions for housing issues identified in their area. The “creation of more mixed income neighborhoods” was a solution that residents chose to solve the following issues:

- Concentration of racial and ethnic minorities in low income communities
- Discrimination/institutional racism
- High quality schools not equally distributed throughout the region

The diversity of neighborhoods in regards to race/ethnicity as well as socioeconomic diversity, was also a key topic discussed among professionals and community stakeholders at a Housing Affordability Workshops hosted in January and February by the Douglas County Health Department.
COUNCIL BLUFFS

Council Bluffs has 36 block groups in 15 census tracts that meet HUD’s definition of high concentration low-to-moderate income households. From a neighborhood perspective, the north end and east end have the fewest number of high-poverty block groups with only five in the north end and one in the east end. The west end and midcity/Kanesville-Tinley, downtown and bluff-willow neighborhoods have the highest number of qualified block groups. Between these two areas, only 10 block groups do not meet the definition.

Table V-34 High Poverty Census Tracts by Neighborhood

<table>
<thead>
<tr>
<th>North End</th>
<th>South End</th>
<th>East End</th>
<th>West End</th>
<th>Mid-City/Kanesville-Tinley, Downtown, Bluff-Willow</th>
<th>Industrial Area, Twin-City/Mainor, Lava Manawa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Census Tract Block Group</td>
<td>% Low-Med</td>
<td>Census Tract Block Group</td>
<td>% Low-Med</td>
<td>Census Tract Block Group</td>
<td>% Low-Med</td>
</tr>
<tr>
<td>30100 1</td>
<td>47%</td>
<td>30600 1</td>
<td>62%</td>
<td>31100 1</td>
<td>40%</td>
</tr>
<tr>
<td>30100 2</td>
<td>77%</td>
<td>30600 2</td>
<td>42%</td>
<td>31100 2</td>
<td>42%</td>
</tr>
<tr>
<td>30100 3</td>
<td>58%</td>
<td>30600 3</td>
<td>33%</td>
<td>31100 3</td>
<td>83%</td>
</tr>
<tr>
<td>30100 4</td>
<td>20%</td>
<td>30600 4</td>
<td>55%</td>
<td>31100 4</td>
<td>34%</td>
</tr>
<tr>
<td>30100 5</td>
<td>45%</td>
<td>30600 5</td>
<td>55%</td>
<td>31100 5</td>
<td>34%</td>
</tr>
<tr>
<td>30100 6</td>
<td>68%</td>
<td>30600 6</td>
<td>66%</td>
<td>31100 6</td>
<td>67%</td>
</tr>
<tr>
<td>30100 7</td>
<td>29%</td>
<td>30600 7</td>
<td>29%</td>
<td>31100 7</td>
<td>29%</td>
</tr>
<tr>
<td>30100 8</td>
<td>11%</td>
<td>30600 8</td>
<td>11%</td>
<td>31100 8</td>
<td>11%</td>
</tr>
<tr>
<td>30100 9</td>
<td>47%</td>
<td>30600 9</td>
<td>47%</td>
<td>31100 9</td>
<td>47%</td>
</tr>
<tr>
<td>30100 10</td>
<td>35%</td>
<td>30600 10</td>
<td>35%</td>
<td>31100 10</td>
<td>35%</td>
</tr>
<tr>
<td>30100 11</td>
<td>27%</td>
<td>30600 11</td>
<td>27%</td>
<td>31100 11</td>
<td>27%</td>
</tr>
<tr>
<td>30100 12</td>
<td>58%</td>
<td>30600 12</td>
<td>58%</td>
<td>31100 12</td>
<td>58%</td>
</tr>
<tr>
<td>30100 13</td>
<td>3%</td>
<td>30600 13</td>
<td>3%</td>
<td>31100 13</td>
<td>3%</td>
</tr>
<tr>
<td>30100 14</td>
<td>3%</td>
<td>30600 14</td>
<td>3%</td>
<td>31100 14</td>
<td>3%</td>
</tr>
<tr>
<td>30100 15</td>
<td>3%</td>
<td>30600 15</td>
<td>3%</td>
<td>31100 15</td>
<td>3%</td>
</tr>
</tbody>
</table>

Source: HUD 2017 LMISD by State, 2006-2010 ACS

Many comments during the public comment period surrounded availability of affordable housing in a range of sizes in all areas of the city. This included rental and owner occupied. Voucher holders stated they cannot find housing large enough within their budget in areas they wish to live. According to the American Community Survey, there are only 653 units in Council Bluffs with five or more bedrooms (2.4%). This significantly hinders large families from finding affordable housing that suits their needs. Approximately 17% of households have four or more persons.

Access to housing in the Lewis Central Community School District was also discussed by families of low-to-moderate income. Located in the east end, housing in the district is typically more expensive and in low-poverty neighborhoods. While most comments
were not provided by protected classes, the overwhelming request for more affordable housing would benefit all residents of Council Bluffs.

BELLEVUE

Examination of the conditions of poverty in Bellevue is also necessary to understand fair housing opportunities in the city. When comparing poverty rates in Bellevue to those in state, Bellevue poverty rates are relatively low in all categories except in the female head of household and related children under 18 years of age, which could be related.

Table V-35 Poverty by Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Bellevue (%)</th>
<th>Nebraska (%)</th>
<th>National (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age 65 and older</td>
<td>4.7</td>
<td>7.8</td>
<td>9.4</td>
</tr>
<tr>
<td>All Families</td>
<td>8.0</td>
<td>8.7</td>
<td>11.3</td>
</tr>
<tr>
<td>Families with Female Head of Household</td>
<td>27.2</td>
<td>30.3</td>
<td>30.6</td>
</tr>
<tr>
<td>Related children under 18 years of age</td>
<td>15.2</td>
<td>16.6</td>
<td>18.0</td>
</tr>
<tr>
<td>All categories</td>
<td>11.3</td>
<td>12.7</td>
<td>15.5</td>
</tr>
</tbody>
</table>

Source: 2010-2012 ACS

Bellevue has 10 census tracts spread through the city limits that meet HUD definition of a high concentration low- to moderate-income census block group, which is a census tract in which 51 percent or more of the residents are low- to moderate-income. The below a table presents data on LMI areas of Bellevue and a map shows the areas described. The map shows each census tract as a different color with each low and moderate income block groups outlined in red.
Figure V-90  LMI Census Tracts in Bellevue

Source: HUD 2017 LMISD by State, 2006-2010 ACS
Figure V-36. LMI Census Tracts & Block Groups within the City of Bellevue

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Block Group</th>
<th>Total Population</th>
<th>LMI Population</th>
<th>% LMI</th>
</tr>
</thead>
<tbody>
<tr>
<td>101.04</td>
<td>2</td>
<td>1,105</td>
<td>685</td>
<td>61.99 %</td>
</tr>
<tr>
<td>101.06</td>
<td>4</td>
<td>530</td>
<td>435</td>
<td>82.08 %</td>
</tr>
<tr>
<td>101.06</td>
<td>5</td>
<td>680</td>
<td>515</td>
<td>75.74 %</td>
</tr>
<tr>
<td>101.07</td>
<td>1</td>
<td>1,635</td>
<td>1,170</td>
<td>71.56 %</td>
</tr>
<tr>
<td>101.08</td>
<td>1</td>
<td>845</td>
<td>710</td>
<td>84.02 %</td>
</tr>
<tr>
<td>102.04</td>
<td>1</td>
<td>925</td>
<td>690</td>
<td>74.59 %</td>
</tr>
<tr>
<td>103.05</td>
<td>1</td>
<td>215</td>
<td>115</td>
<td>53.49 %</td>
</tr>
<tr>
<td>103.05</td>
<td>3</td>
<td>750</td>
<td>435</td>
<td>58.00 %</td>
</tr>
<tr>
<td>103.06</td>
<td>1</td>
<td>650</td>
<td>350</td>
<td>53.85 %</td>
</tr>
<tr>
<td>103.05</td>
<td>2</td>
<td>345</td>
<td>185</td>
<td>53.62 %</td>
</tr>
<tr>
<td>104.02</td>
<td>4</td>
<td>970</td>
<td>525</td>
<td>54.12 %</td>
</tr>
<tr>
<td>105.01</td>
<td>1</td>
<td>955</td>
<td>615</td>
<td>64.40 %</td>
</tr>
<tr>
<td>105.02</td>
<td>2</td>
<td>1,335</td>
<td>905</td>
<td>67.79 %</td>
</tr>
<tr>
<td>105.03</td>
<td>3</td>
<td>420</td>
<td>220</td>
<td>52.38 %</td>
</tr>
</tbody>
</table>

Source: HUD 2017 LMISD by State, 2006-2010 ACS
e. Access to Environmentally Healthy Neighborhoods

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

Figure V-37 Regional Environmental Health Index

<table>
<thead>
<tr>
<th>(Omaha-Council Bluffs, NE-IA) Region</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>67.73</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>57.01</td>
</tr>
<tr>
<td>Hispanic</td>
<td>56.19</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>62.38</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>58.61</td>
</tr>
<tr>
<td>Population below federal poverty line</td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>60.40</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>53.91</td>
</tr>
<tr>
<td>Hispanic</td>
<td>52.29</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>52.11</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>50.85</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Through the Affirmatively Furthering Fair Housing Data and Mapping Tool, HUD has provided Environmental Health Indicator (“EHI”) scores for use in this study. The scores are on a scale of 0 to 100. Higher scores are meant to reflect greater the access to environmentally health neighborhoods. According to Table 12 – Opportunity Indicators, by Race/Ethnicity, the average EHI score for people living within the Omaha-Council Bluffs Region is 60.38, which is higher than average scores for the Omaha, Council Bluffs, and Bellevue. The region includes many rural, less-populated areas, which generally have higher EHI scores.

Across the region, Asian or Pacific Islander, Non-Hispanic group shows the largest difference in scores between Total Population and Population Below Federal Poverty Line (10.27 points), and the Black, Non-Hispanic Group shows the smallest difference in
scores (3.1). The Native American, Non-Hispanic group has the lowest EHI score (50.85) for Population Below the Federal Poverty Line. The Hispanic group has the lowest EHI score (56.19) for Total Population. The White, Non-Hispanic group has the highest EHI score (67.73) for Total Population, and the highest EHI score (60.40) for Population Below Federal Poverty Line. The White, Non-Hispanic group is also the largest population in most Census tracts with higher EHI scores within the region.

OMAHA

Table V-38 Omaha Council Bluffs Consortium Environmental Health Index Scores

<table>
<thead>
<tr>
<th>[CNSRT-Omaha, NE CONSORTIA] Jurisdiction</th>
<th>Environmental Health Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>59.75</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>55.24</td>
</tr>
<tr>
<td>Hispanic</td>
<td>51.96</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>58.87</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>52.65</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Population below federal poverty line</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>52.71</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>53.40</td>
</tr>
<tr>
<td>Hispanic</td>
<td>49.19</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>47.38</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>49.12</td>
</tr>
</tbody>
</table>

Within the jurisdiction, the EHI scores between Total Population and Population Below Federal Poverty Line vary. The Asian or Pacific Islander, Non-Hispanic group shows the largest difference between scores (11.49 points). This may be due to the large number of Asian refugees living within Census tracts 16, 18, 43, 48, 49, and 52 which have fairly low EHI scores. The Black, Non-Hispanic group shows the smallest difference between scores (1.84 points), and this may be due to the concentration of the Black population in northeastern Omaha. The census tracts in that area do not show significant fluctuations in the EHI scores.
The Asian or Pacific Islanders, Non-Hispanic group has the lowest EHI score (47.38) for Population Below Federal Poverty Line. The Hispanic group has the lowest EHI score (51.96) for Total Population. The White, Non-Hispanic group has the highest EHI score (59.75) for Total Population, while the Black, Non-Hispanic group has the highest EHI score (53.40) for Population Below Federal Poverty Line.

**Figure V-91 Omaha Jurisdiction Environmental Health Index**

![Map of Omaha Jurisdiction Environmental Health Index](image)

Source: HUD Map 13 Demographics and Environmental Health

Within both the jurisdiction and region, the Hispanic and Native American groups have low EHI scores. The White, Non-Hispanic groups scores the highest. It is the highest scoring group for Total Population within the jurisdiction and region, the highest scoring group Population Below Federal Poverty Line in the region, and second highest in the jurisdiction.

**COUNCIL BLUFFS**

Environmental health index numbers for the City of Council Bluffs range from 15 to 76. The area with the lowest health index is Census tract 309 with a score of 15. This area includes the historic 100 Block to the east, South 8th Street on the west, Mill Street to the north and 9th Avenue to the south. Census tract 309 includes some of the poorest neighborhoods in Council Bluffs.

West End areas and neighborhoods adjacent to US Interstate 80 also have lowered environmental health ratings, which range from 35 to 44. These corresponding census
tracts are outlined above as having higher concentrations of low-to-moderate income families and families living in poverty.

Table V-39 Environmental Health Index by Race/Ethnicity

<table>
<thead>
<tr>
<th>(Council Bluffs, IA CDBG) Jurisdiction</th>
<th>Environmental Health Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>46.19</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>45.05</td>
</tr>
<tr>
<td>Hispanic</td>
<td>40.68</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>44.01</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>42.51</td>
</tr>
<tr>
<td>Population below federal poverty line</td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>43.61</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>50.19</td>
</tr>
<tr>
<td>Hispanic</td>
<td>45.52</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>44.00</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>47.65</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity
Table 12 provides information on the environmental health index for the City as well as the region. The health index for Council Bluffs and the metropolitan area is similar across the board for all racial/ethnic groups.

**BELLEVUE**

The Environmental Health Index in HUD AFFH Table 12 measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. All of the scores for individuals' racial and ethnic groups are relatively close to each other, with no one group appearing to be affected more by environmental issues.

**Figure V-40 Bellevue Environmental Health Index**

<table>
<thead>
<tr>
<th>Population</th>
<th>Environmental Health Index</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Bellevue</td>
</tr>
<tr>
<td><strong>Total Population</strong></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>70.70</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>68.97</td>
</tr>
<tr>
<td>Hispanic</td>
<td>69.76</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>68.96</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>69.74</td>
</tr>
<tr>
<td><strong>Population below federal poverty line</strong></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>66.78</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>59.82</td>
</tr>
<tr>
<td>Hispanic</td>
<td>69.98</td>
</tr>
</tbody>
</table>
Asian or Pacific Islander, Non-Hispanic | 69.74 | 49.61  
Native American, Non-Hispanic | 71.49 | 48.97  

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

The Environmental Health Index in HUD Table 12 measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. All of the scores for individuals’ racial and ethnic groups are relatively close to each other, with no one group appearing to be affected more by environmental issues. Bellevue appears to have greater opportunity for access to environmental health index when compared to the region as a whole. The Omaha-Council Bluffs region areas to be 10 to 20 points lower than the Bellevue community.

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

OMAHA

HUD Map 13 is generated from HUD’s Affirmatively Furthering Fair Housing Data Mapping Tool. On this map, Census tracts are color coded in shades of gray by their EHI score. According to HUD, “the Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.”

Figure V-92 Regional Environmental Health Index
Source: HUD Map 13 Demographics and Environmental Health; 2010 Census

EHI scores are based on a scale of 0 to 100 points. Darker shaded census tracts have higher (better) scores, while lighter shaded areas have a lower (worse) scores. Areas without shading do not have an EHI value. This is probably due to a lack of data with which to calculate a score.

Census tracts with darker shading, indicating higher EHI scores, tend to be furthest from the urban core (i.e., Omaha and Council Bluffs) and are rural in nature. Although there are environmental hazards present in these areas, such has farm chemicals, lead-based paint hazards, and emissions from transportation routes, they are not frequently occurring. Urban areas tend to have more emissions, more hazards, and more people who may be exposed to health risks.
Figure V- 93Omaha 2010 R/ECAP Environmental Health Index

Source: HUD Map 13 Demographics and Environmental Health; 2010 Census

Also visible on this map (in magenta) are the 12 R/ECAP Census tracts within the jurisdiction and region. A close up view of that area is presented at left. All twelve areas are located in Omaha, Nebraska, and most of those are located in an area referred to as North Omaha.

Table V-41 Environmental Health Index for R/ECAP Census Tracts

<table>
<thead>
<tr>
<th>R/ECAP Census Tract</th>
<th>EHI</th>
<th>R/ECAP Census Tract</th>
<th>EHI</th>
</tr>
</thead>
<tbody>
<tr>
<td>006101</td>
<td>60</td>
<td>000800</td>
<td>60</td>
</tr>
<tr>
<td>006000</td>
<td>52</td>
<td>001100</td>
<td>43</td>
</tr>
<tr>
<td>000600</td>
<td>42</td>
<td>001200</td>
<td>55</td>
</tr>
</tbody>
</table>
Based on visual observation, the EHI scores of the twelve R/ECAP Census tracts are generally consistent with EHI scores for the adjacent non-R/ECAP Census tracts, as well as Census tracts within the urban areas in the region. However, no R/ECAP Census tract scores higher than 60 points (as may be seen on the table presented below), while some non-R/ECAP Census tract exceed 80 points and a few score more than 90 points.

In general, Census tracts located closer to Omaha’s Central Business District, and areas with a commercial, civic, or industrial focus score more poorly than areas with a residential or rural character. In Omaha, major transportation routes such as Interstates and railroad lines also appear to be a factor in restricting high EHI scores. Census tracts with older housing stock, including much of eastern Omaha and most of Council Bluffs, appear to have lower scores than those in western Omaha, Sarpy County and portions of Council Bluffs, which generally have newer housing stock and have been heavily developed over the past 20 to 30 years.

In general, Black, Non-Hispanic and Hispanic populations are focused eastern Omaha. The following map shows that in north Omaha specifically, the Black population is focused in R/ECAP Census tracts. The southern two R/ECAP Census tracts are predominantly a mix of White, Non-Hispanic and Hispanic populations. The lowest scoring R/ECAP Census tract is predominantly White, Non-Hispanic.

**Figure V-94 Omaha National Origin and Environmental Health Index**

<table>
<thead>
<tr>
<th>005901</th>
<th>60</th>
<th>005100</th>
<th>31</th>
</tr>
</thead>
<tbody>
<tr>
<td>005902</td>
<td>60</td>
<td>004000</td>
<td>18</td>
</tr>
<tr>
<td>000700</td>
<td>53</td>
<td>002400</td>
<td>50</td>
</tr>
</tbody>
</table>

Source: HUD Map 13
A majority of the population in all R/ECAP Census tracts was born in the United States of America. According to the following map, Mexico is the most common point of origin for people of foreign birth. The orange dots on the following map are representative of Mexican origin. Two of the R/ECAP Census tracts have sizeable populations from Mexico, equaling about 17 and 28 percent of each total population. One of the R/ECAP Census tracts has a small, but significant population from Thailand, representing 9 percent of the population.

Figure V-95 Omaha Family Size and Environmental Health Index
In the R/ECAP Census tracts, 40 to 80 percent of households are families with children, according to the map presented below. These numbers are generally consistent with those of adjacent non-R/ECAP Census tracts, but higher overall than many parts of the jurisdiction, specifically central Omaha.

However, these maps do not tell the tale of three interrelated issues, lead hazards, asthma triggers, and housing maintenance, which do create a disparity in access to healthy neighborhoods. Exposure to lead hazards, poor housing maintenance, and asthma triggers are significantly higher in eastern Omaha where there is older housing stock, fewer families with resources with which to maintain their homes, less education about home maintenance, fewer land lords engaged in active property maintenance, more industries, more transportation routes, and a more densely built environment. These same areas contain Omaha’s R/ECAP, and highest concentrations of minority households.
Map 13 outlines environmental health as related to race/ethnicity, national origin, and familial status. For race/ethnicity, census tracts in the west end, mid-city and south end have the highest proportion of Hispanic families compared to other areas of the City. Additionally, they are the areas with the highest number of LEP families and are average for family size. These areas also have the highest environmental health risk as they are near major thoroughfares and industrial areas.

**BELLEVUE**

HUD AFFH Map 13 shows the values for the Environmental Health Index with shading at the census tract level indicating levels of exposure to environmental health hazards. Data for one census tract is unavailable, but contains no environmental concerns that would be separate from the surrounding neighborhoods.

Those races, ethnicities and families with children living in southwest Bellevue in the Olde Towne area appear to have very slightly lower access to environmentally healthy neighborhoods than the rest of the community.

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

The Regional Fair Housing survey, sought to identify environmental issues that are concerning to residents by asking the question, “Do you have concerns about any of the following environmental issues at your residence? Select all that apply.” Options given as a selection choice included: lead, mold, asbestos, air quality indoor, air quality outdoor, radon, noise, insects, rodents, illegal dumping, working utilities (water, electricity, gas, trash, etc.), and other. Respondents identified their top five concerns as follows, listed in the order they were prioritized:

- Insects
- Radon
- Mold
- Noise
- Lead

In the other category, the most common responses among residents listed were water quality and vehicle noise.

Residents were also asked “Have you experienced any health issues related to environmental health issues?” Out of the 1,323 respondents that chose to answer this
question, 7.74% (102 persons) responded, “yes.” Over half of these respondents stated that they have asthma issues, followed by COPD and allergy issues they associate with environmental impacts.

Additionally, when surveyed, “In the last 5 years, did you knowingly move into an environmentally unhealthy neighborhood or residence because you could not afford to move into an environmentally healthy neighborhood or residence?” 4.72% or 62 persons who answered the question said “yes.”

The maps and tables provided by HUD are based on the EPA’s National Air Toxics Assessment (NATA). This assessment is conducted by collecting data on air toxics that are released outdoors. This presents limitations to how the data should be used, as EPA acknowledges (https://www.epa.gov/national-air-toxics-assessment/nata-limitations). Although the NATA may provide a more reliable regional look at the air quality, it is not useful for comparing nearby neighborhoods to one another. In addition the HUD Environmental Health Index data would not include some of the more prevalent environmental challenges that region faces which may disproportionately affect lower-income areas such as lead in the soil or proximity to Brownfields.

OMAHA

As a part of our stakeholder and community meetings, the majority of comments raised in regards to environmental issues were related to concerns over the quality of rental housing and elderly housing. Many neighborhoods East of 72nd have older housing stock which is deteriorating. Issues with lead paint and asbestos provide a challenge in safety/health as well as housing rehab.

Additionally Omaha has the largest superfund site in the country that is located within a residential area. HUD and EPA resources have assisted the City and County, as well as non-profit organizations such as Omaha Healthy Kids Alliance to address lead hazards in homes and yards across the superfund site.

The Omaha Lead Site was designated as a superfund site in 1999 due to high levels of lead contamination in soil resulting primarily from lead smelting and refining at the ASARCO facility from the late 1800s until the mid-1990s. The EPA added the Omaha Lead Superfund Site to the National Priority List in 2003. The boundaries of the Final Focus area are defined as south of Read Street, north of the Sarpy County Line (Harrison Street), and east of 56th Street to the State line. The site is defined as the residential properties that became contaminated with lead above health-based levels as a result of historic emissions due to lead processing (USEPA, 2009). The primary source of contamination was from aerial deposition of lead particles from smelting and
refining activities located in downtown in Omaha.


### Table V-42 EPA Timeline of Events for Omaha Lead Superfund Site

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>1998</td>
<td>The Omaha City Council sent a letter to EPA requesting assistance to address the high incidence of elevated blood lead levels found in children.</td>
</tr>
<tr>
<td>March 1999</td>
<td>EPA began collecting soil from residential properties being used as child day-care facilities.</td>
</tr>
<tr>
<td>August 1999</td>
<td>EPA entered into several interagency agreements with the US Army Corps of Engineers to conduct Time Critical Removal Actions at more than 250 properties. EPA also issued a Unilateral Order to ASARCO.</td>
</tr>
<tr>
<td>April 2003</td>
<td>Omaha Lead Superfund Site listed on the National Priority List (NPL).</td>
</tr>
<tr>
<td>December 2004</td>
<td>EPA issued an Interim Record of Decision</td>
</tr>
<tr>
<td>May 2009</td>
<td>EPA issued the Final Record of Decision</td>
</tr>
<tr>
<td>June 2009</td>
<td>Settlement of the court case with ASARCO for more than $200 million</td>
</tr>
<tr>
<td>December 2015</td>
<td>EPA completed the cleanup of 13,090 residential properties</td>
</tr>
<tr>
<td>Ongoing</td>
<td>The City of Omaha and Douglas County Health Department continue efforts to address lead contamination issues at the remaining properties where the owner was not willing to grant access to collect soil samples or clean up lead contaminated soil.</td>
</tr>
</tbody>
</table>

Source: EPA Superfund Site Cleanup Activities; Omaha [https://cumulis.epa.gov/supercpad/SiteProfiles](https://cumulis.epa.gov/supercpad/SiteProfiles)

The final focus site is completely East of 72nd Street which also contains all of Omaha’s R/ECAP areas and the majority of housing stock built prior to 1960.

Additional information on EPA environmental indicators can be viewed on EJSCREEN, the EPA’s Environmental Justice Screening and Mapping Tool ([https://ejscreen.epa.gov](https://ejscreen.epa.gov)). For example, the map below ranks census tracts based on
the distance of the total population from superfund sites on the National Priorities List.

**Figure V-96 Omaha Superfund Proximity Index**

![Superfund Proximity Map](image)

Source: EJSCREEN Maps, Environmental Indicators, Superfund Proximity

The Lead Paint Indicator is another index, that rates the risk of exposed to lead paint based on the age of the housing stock (pre-1960). The map below indicates that the risks are again greater to the East of 72nd Street.

**Figure V-97 Omaha EPA Lead Paint Indicator**

![Lead Paint Map](image)
When comparing these environmental indicators for the population in Omaha living below the poverty level, it indicates that areas with the highest poverty are also neighborhoods with the highest risk of exposure to lead. Residents and especially children in these areas are at a greater risk for lead poisoning. Efforts to provide education and resources to families in Eastern Omaha are ongoing.

Figure V-98 Omaha Population Below Federal Poverty Level
Leaky Underground Storage Tanks: The City of Council Bluffs has 164 underground storage tanks according to the Iowa Department of Natural Resources (IDNR). Of these, 16 are considered “high risk,” six are considered “low risk,” 138 are considered
“no action required” and four are not classified. Of the 16 that are “high risk,” they are located throughout the City with concentrations along the business and industrial corridors. These areas align with the West End, South End, Mid-City and Downtown neighborhoods.

**Lead Nonattainment Area:** In 2008, the area bounded by Avenue G on the north, N 16th/S 16th street on the east, 23rd Avenue on the south, and N 35th/S 35th street on the west was designated a lead nonattainment area. This section encompasses Census Tracts 304.01, 304.02, 305.01, 305.02, 306.01, and 306.02. As stated previously, these census tracts are overwhelmingly low-to-moderate income and represent the City’s cluster of minority population.

**Radon:** The Iowa Radon Survey found that Iowa has the largest percentage (71.6 percent) of homes with radon levels above the EPA action level of 4 picocuries per liter (pCi/L) of any state, according to the Iowa Department of Public Health website. The national average for indoor radon levels is 1.3 picocuries per liter, while Iowa’s average is 8.5 pCi/L. Radon causes an estimated 21,000 lung cancer deaths a year in the United States, making it the second-leading cause of lung cancer (after tobacco use). It is the leading cause of lung cancer for nonsmokers.

**Brownfields:** Because of Council Bluffs’ industrial history, the City has several brownfield sites throughout the community. Most industrial uses were located in the Mid-City and West End neighborhoods, which align with some of the most impoverished areas in Council Bluffs. The City has worked closely with the US Environmental Protection Agency (EPA) and the Iowa Department of Natural Resources (IDNR) to identify brownfield redevelopment sites and complete cleanup activities. To date, the City has spent over $1.4 million in EPA grant dollars to complete site assessments and cleanups.

**BELLEVUE**

Quality of neighborhood environmental health is similar for all racial and ethnic group. As with the Labor Market Engagement and Poverty concentration, Blacks living below the poverty line are more likely to face a higher risk of exposure to environmental health concerns.

**f. Patterns in Disparities in Access to Opportunity**
i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

Table V-43 NE-IA Regional Opportunity Indicators by Race/Ethnicity

<table>
<thead>
<tr>
<th></th>
<th>Low Poverty Index</th>
<th>School Proficiency Index</th>
<th>Labor Market Index</th>
<th>Transit Index</th>
<th>Low Transportation Cost Index</th>
<th>Jobs Proximity Index</th>
<th>Environmental Health Index</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TOTAL POPULATION</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>67.30</td>
<td>52.38</td>
<td>74.72</td>
<td>28.43</td>
<td>60.80</td>
<td>51.20</td>
<td>67.73</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>34.02</td>
<td>20.43</td>
<td>43.98</td>
<td>36.42</td>
<td>69.82</td>
<td>47.32</td>
<td>57.01</td>
</tr>
<tr>
<td>Hispanic</td>
<td>41.73</td>
<td>29.13</td>
<td>51.10</td>
<td>35.69</td>
<td>69.60</td>
<td>49.60</td>
<td>56.19</td>
</tr>
<tr>
<td>Asian, Pacific Islander</td>
<td>64.02</td>
<td>50.15</td>
<td>75.16</td>
<td>34.19</td>
<td>68.93</td>
<td>53.97</td>
<td>62.38</td>
</tr>
<tr>
<td>Native American</td>
<td>47.53</td>
<td>33.59</td>
<td>55.77</td>
<td>34.00</td>
<td>67.42</td>
<td>52.51</td>
<td>58.61</td>
</tr>
<tr>
<td><strong>POPULATION BELOW FEDERAL POVERTY LINE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>51.23</td>
<td>39.23</td>
<td>62.80</td>
<td>31.91</td>
<td>66.20</td>
<td>53.87</td>
<td>60.40</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>23.91</td>
<td>16.03</td>
<td>35.25</td>
<td>37.95</td>
<td>71.51</td>
<td>47.32</td>
<td>53.91</td>
</tr>
<tr>
<td>Hispanic</td>
<td>31.44</td>
<td>23.01</td>
<td>43.21</td>
<td>38.57</td>
<td>72.76</td>
<td>49.97</td>
<td>52.29</td>
</tr>
<tr>
<td>Asian, Pacific Islander</td>
<td>47.89</td>
<td>35.05</td>
<td>63.45</td>
<td>38.16</td>
<td>75.31</td>
<td>48.26</td>
<td>52.11</td>
</tr>
<tr>
<td>Native American</td>
<td>32.94</td>
<td>23.01</td>
<td>48.31</td>
<td>41.08</td>
<td>74.27</td>
<td>49.63</td>
<td>50.85</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by race/ethnicity

OMAHA
Table V-44 Omaha Jurisdiction Opportunity Indicators by Race/Ethnicity

<table>
<thead>
<tr>
<th></th>
<th>Low Poverty Index</th>
<th>School Proficiency Index</th>
<th>Labor Market Index</th>
<th>Transit Index</th>
<th>Low Transportation Cost Index</th>
<th>Jobs Proximity Index</th>
<th>Environmental Health Index</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TOTAL POPULATION</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>61.13</td>
<td>43.63</td>
<td>73.64</td>
<td>35.71</td>
<td>70.72</td>
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<td>14.26</td>
<td>38.03</td>
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<td>71.63</td>
<td>47.46</td>
<td>54.42</td>
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<td>Hispanic</td>
<td>32.61</td>
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<td>38.80</td>
<td>73.43</td>
<td>49.83</td>
<td>51.74</td>
</tr>
<tr>
<td>Asian, Pacific Islander</td>
<td>55.42</td>
<td>40.93</td>
<td>70.74</td>
<td>38.12</td>
<td>74.97</td>
<td>54.13</td>
<td>55.40</td>
</tr>
<tr>
<td>Native American</td>
<td>36.76</td>
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<td>47.52</td>
<td>38.50</td>
<td>73.64</td>
<td>53.32</td>
<td>51.67</td>
</tr>
<tr>
<td><strong>POPULATION BELOW FEDERAL POVERTY LINE</strong></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>46.05</td>
<td>30.24</td>
<td>61.13</td>
<td>38.70</td>
<td>75.59</td>
<td>55.49</td>
<td>52.89</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>20.99</td>
<td>13.18</td>
<td>32.25</td>
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<td>72.20</td>
<td>47.33</td>
<td>53.01</td>
</tr>
<tr>
<td>Hispanic</td>
<td>25.10</td>
<td>17.68</td>
<td>37.33</td>
<td>41.01</td>
<td>76.00</td>
<td>50.40</td>
<td>49.10</td>
</tr>
<tr>
<td>Asian, Pacific Islander</td>
<td>42.30</td>
<td>31.51</td>
<td>60.98</td>
<td>41.14</td>
<td>79.43</td>
<td>47.45</td>
<td>46.52</td>
</tr>
<tr>
<td>Native American</td>
<td>31.23</td>
<td>22.62</td>
<td>46.75</td>
<td>43.18</td>
<td>76.73</td>
<td>50.29</td>
<td>49.25</td>
</tr>
</tbody>
</table>

Source: HUD Table 12 Opportunity Indicators by race/ethnicity

According to HUD Table 12, in the Omaha jurisdiction, White, Non-Hispanic households have higher opportunity index scores in every category measured with the exception of transit index scores and low transportation cost index scores for the total population. Below the poverty line White households also have the highest scores with the exception of the same transit and transportation categories and the environmental health index scores. Conversely, Black, Non-Hispanic households have the lowest opportunity index scores above and below the poverty line with the exception of transit index, low transportation cost index, and environmental health index. Overall, White and
Asian or Pacific Islander households have higher index scores in the majority of categories. Black, Hispanic, and Native American households have lower scores above and below the poverty line in most access to opportunity categories with the exception those related to transportation and environmentally healthy neighborhoods.

As mentioned in the access to transportation section, the HUD data regarding transit index and transportation cost index was based on a very small percentage of the population in Omaha. In comparison to local data and community feedback, HUD data in these categories does not accurately reflect access to transportation in Omaha.

Similarly, as mentioned in the access to environmental healthy neighborhoods section, HUD’s environmental health index was based solely on air quality index models. These models are based on estimates from local monitors and the self-reporting of local businesses. The data is recommended for use when assessing regions rather than on a neighborhood to neighborhood basis.

COUNCIL BLUFFS

Overall, the Opportunity Indicators are evenly dispersed by all race/ethnic groups with the exception of school proficiency. According to Table 12, Hispanic residents are slightly lower in opportunities than other races. Additionally, of those below the poverty line, Asian or Pacific Islander, Non-Hispanic and Native American, Non-Hispanic are disproportionately negatively impacted in the school proficiency area. This is debatable because the method of data collection by HUD skews the results for the Lewis Central Community School District.

BELLEVUE

Overall, the Opportunity Indicators Index values are evenly dispersed through the race and ethnicities in Bellevue. Multiple indices are inversely correlated with each other such as the Transit Trips index values being low while Low Transportation Cost index being high for Bellevue.
ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

OMAHA

a. Areas to the west of 72nd Street in Omaha have the highest access to low poverty neighborhoods, jobs, and proficient schools. These neighborhoods also have the fewest number of housing problems. It is more difficult to find affordable housing west of 72nd and there is also less access to public transportation in the western portion of the city. The neighborhoods in Southwest Omaha tend to be the most homogenous neighborhoods in Omaha, with many Census tracts showing 90% or more households identifying as White, Non-Hispanic.

b. Areas of Omaha to the east of 72nd Street have a higher percentage of issues with housing problems, deteriorating housing stock, proximity to environmental issues, higher unemployment, higher rates of poverty, and less access to proficient schools. The same neighborhoods to the east of 72nd also have significantly higher populations of protected classes including minority households and residents with limited English proficiency. This area also has some of the most affordable housing based on the median income of the City. The majority of publicly supported housing is also concentrated to the east of 72nd Street.

COUNCIL BLUFFS

In Council Bluffs, residents in the east end have a higher access level than those in the west end, mid-city and Kanesville-Tinley areas. This is particularly relevant in with access to low poverty neighborhoods.

BELLEVUE

Most neighborhoods are similar throughout Bellevue. The central and north central areas of Bellevue appear to be the most segregated for national origin while the southeastern, Olde Towne area has more poverty.

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

OMAHA

As mentioned in previous sections, a majority of the issues identified in HUD tables and maps under disparities in access to opportunities in Omaha included the impact of protected classes by race/ethnicity, national origin, limited English proficiency, and family size. Additional issues regarding access to opportunity for residents in protected classes mentioned throughout the community engagement process include access for aging residents, the disability community, and the LGBTQIA+ Community (Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual and plus indicating the inclusion of all other identities).

In both community meetings and through the Regional Fair Housing Survey, senior citizens expressed concerns with discrimination in employment opportunities, limited affordable housing for persons on fixed-incomes, and a need for more programs and services to help with affordable home repair and accessibility modifications. Similar concerns regarding lack of affordable housing and a need for accessibility modifications were expressed by the disability community. In addition, the need for more transportation options and senior and accessible housing along transportation corridors was mentioned in multiple forms of community feedback. Residents representing the disability community also expressed the need for making certain sidewalks in the city are in good repair and allow for persons with mobility challenges to cross streets and access bus stops.

Attendees of the LGBTQIA+ focus group shared experiences of discrimination and fears of safety based on sexual orientation or gender identity regarding their employment, housing, and living situations. Attendees expressed the importance of the ordinance passed in 2012 to include the protection of the LGBTQIA+ community in Omaha's law prohibiting discrimination in employment, and the need for a similar policy that would provide protection against discrimination in housing. Additionally, survey respondents that identified as being part of the LGBTQIA+ community said that it was very important to feel welcome in their neighborhood. At least one respondent mentioned moving to a different location based on experiences of discrimination and concerns for safety.

COUNCIL BLUFFS
Major disparities in Council Bluffs relate to income and poverty levels.

The United Way ALICE (Asset Limited, Income Constrained, Employed) Report outlines the minimum cost option for each of the five basic household items needed to live and work in today’s economy, which is called the “Household Survival Budget”. The average annual Household Survival Budget for a four-person family living in Iowa is $46,680, an increase of 17 percent from the start of the Great Recession in 2007, driven primarily by a 43 percent increase in the cost of healthcare and a 20 percent increase in the cost of food. The rate of inflation over the same period was 14 percent. This translates for a family of four to an hourly wage of $23.34, 40 hours per week for 50 weeks per year for one parent (or $11.67 per hour each if two parents work). Below is a chart that outlines monthly costs for the average Iowan in 2014 (Attachment L).

Additionally, according to the American Community Survey, 14.8% of Council Bluffs residents lived below the poverty line in the past 12 months. This is higher than both Bellevue (8.0%) and Omaha (11.9%).

In Pottawattamie County, 10,909 children are enrolled in HAWK-i children’s health insurance program for uninsured children of working families. In a 2010 study completed by the University of Iowa, survey respondents reported that almost half of the parents of Hispanic/Latino children did not have health insurance.

Figure V-99 Parent’s Health Insurance by Children’s Race/Ethnicity Council Bluffs
BELLEVUE

Bellevue’s major employers positively impact many of the opportunity indicators. While the current employment market provides opportunities for different level positions, the City needs to continue efforts towards economic development. Local education institutions are partnering with employers and service providers to create job training programs to assist job seekers learn the skills for industries identified for development in Bellevue. Again, stakeholders identified the need for additional transportation opportunities into the Omaha metro area. As the Highway 34 corridor in southern Bellevue is developed, transportation, job training, and housing will be emphasized to encourage industrial jobs location to the area.

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

OMAHA

With over 1,000 non-profit organizations, many for profit, and government agencies, and Omaha’s strong philanthropic community all working to increase quality of life for residents in the metropolitan areas, it would be impossible to provide an exhaustive list of the activities and groups addressing disparities in access to opportunity within this assessment.

Some the organizations who provided data and are working towards common goals in areas regarding access to proficient schools, employment, and transportation include:

Education
- Buffett Early Child Institute
- Early Childhood Services
- Educare Omaha
- College Possible Omaha
- Avenue Scholars
- Learning Communities of Douglas and Sarpy County

Employment
- Greater Omaha Chamber
- Heartland Workforce Solutions
- Empowerment Network/Step-Up Omaha
- Urban League of Nebraska
- Heartland Workers Center
- Vocational Development Center

Transportation
- Mode Shift Omaha
- Metro Area Planning Agency (MAPA)
- Metro Omaha/MOBY by Metro
- Ways to Work
- Heartland BCycle

COUNCIL BLUFFS

Council Bluffs continues to work to remove barriers that may exist for access in opportunities. For transportation, routes were updated in 2016 to reflect areas most frequently traveled and paratransit service was expanded with the assistance of SWITA.
For employment, Advance Southwest Iowa, the Council Bluffs Chamber of Commerce and the City work together to provide incentive packages for existing and prospective businesses. The City utilizes the following forms of incentives to attract development:

- Workforce Housing Tax Credit Program (WHTC)
- Targeted Jobs Withholding Tax Credit Pilot Program
- High Quality Jobs Program
- Iowa Industrial New Jobs Job Training Program (260E)
- Urban Renewal – Tax Increment Financing
- Urban Revitalization
- Capital Improvement Funds
- Community Development Block Grant Program Funds
- Home Investment Partnership Program Funds
- Redevelopment Tax Credits Program for Brownfield and Grayfield Sites
- Historic Preservation Tax Credit Program

BELLEVUE

In 2015, the bus route was changed due to lack of ridership. The Bellevue City Council approved changes to the bus route and the required funding levels to support the route. The City of Bellevue also offers a Specialized Transportation Program that provides transportation to qualified elderly and disabled residents. The cost is $2.00 per trip each way for in town trips and $4.00 for out of Bellevue trips. This service is operated between 8:00 am and 3:00 pm Monday through Friday.

The City of Bellevue is expected to share cost for both services which does affect the service provided. While the overall cost is a factor, the ridership must support the continued delivery of the service. With lower ridership numbers and limited public service dollars available, the transportation services will be scrutinized for benefit provided. Since the service is only provided twice a day five days a week, the households that need the service may not be reached and therefore not truly reflecting the need in the community.

3. Contributing Factors of Disparities in Access to Opportunity

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

OMAHA
Factors included in previous sections under disparities in access to opportunity:

- Location of employers
- Lack of public and private investment in specific neighborhoods
- Segregation
- Availability, type, frequency, and reliability of public transportation
- Location of proficient schools and school assignment policies
- Location of affordable housing
- Access to financial services
- Private discrimination
- Lack of resources for fair housing agencies and organizations
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lending discrimination
- Private discrimination
- Availability of affordable units in a range of sizes
- Deteriorated and abandoned properties
- Source of income discrimination
- Occupancy codes and restrictions
- Displacement of residents due to economic pressures

COUNCIL BLUFFS

Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods
1. Location and type of affordable housing
2. Lack of access to opportunity due to high housing costs
3. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
4. Lack of resources for fair housing agencies and organizations

Disparities in Access to Opportunity: Access to Environmentally Healthy Neighborhoods
1. Location of employers
2. The availability, type, frequency and reliability of public transportation

Disparities in Access to Opportunity: Access to Employment
1. Location of employers
2. The availability, type, frequency and reliability of public transportation
3. Inaccessible buildings, sidewalks, pedestrian crossings or other infrastructure
Availability, type, frequency and reliability of public transportation:
Bellevue currently is limited on public transportation opportunities. This is shown in the low scores on the HUD Transportation Index (HUD Table 12). With Bellevue having substantially more housing development and job centers located in Douglas County and western Sarpy County, most households must rely on their personal car for transportation to employment. Residents also stated that the frequency of the provided bus route and limit coverage does not provide a viable option for transportation.

Households who depend on public transportation are presented barriers to employment opportunities and services. Those who most often depend on public transportation are households living in poverty, individuals with a disability, and elderly.

With the bus route focused east of Highway 75, the remaining western portion of Bellevue has no bus routes into Omaha. This service is limited by the times the services is provided and does not have weekend transportation.

During the community input sessions, Bellevue received input from residents and economic development entities that public transportation is a high need and should be a high priority. While services are being provided, the true need may not be reflected in the ridership and anticipated needs will need to be evaluated to determine effectiveness in addressing need.

Lack of private investments in specific neighborhoods:
Economic development is always a high priority for communities to ensure continued future growth. Developed areas of the city need additional focus to bring private investment such as services and job opportunities to areas that have become stagnant.

With focus on the future growth of the Highway 34 corridor in southern Bellevue, the City will have to look at additional housing, job trainings, and transportation options to encourage development and employment opportunities.

The majority of the established areas, specifically north of Olde Towne Bellevue and east of Fort Crook Road, are residential zoned and have limited commercial and retail space. Development is the older eastern areas of Bellevue are limited by lot availability and have limited commercial zoning available.

The lack of private investments affect those that live in this area of the community
including all races, but does not affect any one class specifically. Accessibility to employment would be more affected by those who are limited to this area based on public transportation needs. The issue has not changed in recent years and change is not anticipated with continued new development moving west and southwest.

With future economic development anticipated specifically along the Highway 34 Development and housing development to continue in the west and southwest portions of Bellevue, the discussion needs to begin regarding housing needs, transportation between housing and employment centers with identification of possible incentives to encourage needed development.

**Location and type of affordable housing:**
Black households living below the poverty level are more likely to be living in a high poverty neighborhood. By addressing the contributing factors listed above and providing affordable housing options throughout the city, opportunities for access could be increased.

**Location of employers:**
This contributing factor is related to others concerning public transportation. Bellevue is limited on employment centers with most households commuting with a mean travel time of 20 minutes (2011-2015 ACS). Most of the major employers in the region are located outside of the city limits. Access to employment centers would assist with creating increased opportunities for low-income households.

The limited access to transportation denies access to employment opportunities for those who cannot not access public transportation. Specifically those who depend on public transportation, such as low-income households, elderly and those with a disability.

Most major employers and employment centers are located outside city limits in west Sarpy County and north in Douglas County. There have not been any major permanent employment increases in Bellevue in previous years. The Highway 34 corridor is the only substantial economic development opportunity on the horizon, but there has not been a commitment from any major industry to begin construction in the area. Economic development and job centers will continue in western Sarpy County which has open land ready for development and is closer to transportation corridor of Interstate 80.

The City of Bellevue does have influence on the development within city limits and the extra territorial jurisdiction. The City does have tools provided by the Legislative Bill
840, Local Option Municipal Economic Development Act, which provides power to use local sources of revenue for economic or industrial projects and programs. This program is being used to promote new development in the Highway 34 Corridor by providing assistance for eligible economic activities such as land purchase, execute options, construction, and loan funding.

*Lack of public investments in specific neighborhoods:*
The City of Bellevue is continually working to address public infrastructure needs. With limited resources available, many projects and needs are not met timely.

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**Introduction**

*Regional Versus Jurisdiction Analysis*
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal
Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA
Douglas County Housing Authority- DCHA
Council Bluffs Municipal Housing Agency- MHA
Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. All tables and data can be accessed online at: https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
### Map Info

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Demographics 2010

1 Dot = 75

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

### National Origin [Jurisdiction] (Top 5 most populous)

1 Dot = 25 People

- Mexico
- India
- El Salvador
- Guatemala
- Thailand

### TRACT

### R/ECAP

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327
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- **North 24th Street Corridor Alliance Boundaries**: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

51. **Downtown**: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
52. **Mid-City**: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
53. **Bluff-Willow**: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
54. **Kanesville-Tinley**: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
55. **North End**: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
56. **West End**: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
57. **South End**: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
58. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
59. Lake Manawa: subdivisions east of Lake Manawa
60. East End: newer area to the east of Bluff-Willow and the North End to the city limits

BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

iv. Disproportionate Housing Needs

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

Table V-44 Housing Characteristics for Region by County

<table>
<thead>
<tr>
<th>Subject</th>
<th>Harrison</th>
<th>Mills</th>
<th>Pottawattamie</th>
<th>Douglas</th>
<th>Sarpy</th>
<th>Cass</th>
<th>Saunders</th>
<th>Washington</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Housing Units</td>
<td>6,731</td>
<td>6,087</td>
<td>39,537</td>
<td>227,013</td>
<td>60,991</td>
<td>11,272</td>
<td>9,380</td>
<td>8,419</td>
</tr>
<tr>
<td>Occupied Units</td>
<td>89.8%</td>
<td>89.4%</td>
<td>92.8%</td>
<td>92.9%</td>
<td>94.7%</td>
<td>86.1%</td>
<td>85.2%</td>
<td>95.3%</td>
</tr>
<tr>
<td>Owner Occupied Avg Household Size</td>
<td>2.39</td>
<td>2.64</td>
<td>2.55</td>
<td>2.69</td>
<td>2.89</td>
<td>2.65</td>
<td>2.6</td>
<td>2.61</td>
</tr>
<tr>
<td>Renter Occupied Avg Household Size</td>
<td>2.10</td>
<td>2.51</td>
<td>2.31</td>
<td>2.25</td>
<td>2.34</td>
<td>2.36</td>
<td>2.52</td>
<td>2.07</td>
</tr>
<tr>
<td>Single Family Detached</td>
<td>85.4%</td>
<td>82.3%</td>
<td>75.8%</td>
<td>67.1%</td>
<td>73.7%</td>
<td>87.4%</td>
<td>86.5%</td>
<td>83.4%</td>
</tr>
<tr>
<td>10-19 Units</td>
<td>.7%</td>
<td>2.3%</td>
<td>3.4%</td>
<td>7.2%</td>
<td>7.4%</td>
<td>1.0%</td>
<td>.2%</td>
<td>1.4%</td>
</tr>
<tr>
<td>20 or More Units</td>
<td>2.2%</td>
<td>.5%</td>
<td>6.3%</td>
<td>10.4%</td>
<td>6.5%</td>
<td>1.7%</td>
<td>2.5%</td>
<td>4.0%</td>
</tr>
<tr>
<td>Built 1939 or earlier</td>
<td>43.2%</td>
<td>28.6%</td>
<td>27.8%</td>
<td>18.6%</td>
<td>3.3%</td>
<td>26.2%</td>
<td>33.5%</td>
<td>21.2%</td>
</tr>
<tr>
<td>No Bedroom</td>
<td>.6%</td>
<td>.9%</td>
<td>1.7%</td>
<td>2.2%</td>
<td>1.1%</td>
<td>2.1%</td>
<td>1.2%</td>
<td>1.2%</td>
</tr>
<tr>
<td>1 Bedroom</td>
<td>7.7%</td>
<td>8.5%</td>
<td>10.7%</td>
<td>14.9%</td>
<td>8.7%</td>
<td>6.2%</td>
<td>5.9%</td>
<td>6.3%</td>
</tr>
<tr>
<td>2 Bedroom</td>
<td>30.4%</td>
<td>21.8%</td>
<td>29.8%</td>
<td>23.4%</td>
<td>18.8%</td>
<td>26.5%</td>
<td>26.3%</td>
<td>21.7%</td>
</tr>
<tr>
<td>3 Bedroom</td>
<td>38.3%</td>
<td>43.9%</td>
<td>39.4%</td>
<td>36.9%</td>
<td>42.7%</td>
<td>38.3%</td>
<td>39.1%</td>
<td>40.0%</td>
</tr>
<tr>
<td>4 Bedroom</td>
<td>16.9%</td>
<td>19.2%</td>
<td>14.5%</td>
<td>17.7%</td>
<td>23.4%</td>
<td>20.1%</td>
<td>20.4%</td>
<td>24.3%</td>
</tr>
<tr>
<td>5 or More Bedroom</td>
<td>6.2%</td>
<td>5.7%</td>
<td>3.9%</td>
<td>4.9%</td>
<td>5.2%</td>
<td>6.9%</td>
<td>7.1%</td>
<td>6.5%</td>
</tr>
</tbody>
</table>

Source: US Census Bureau Comparative Housing Characteristics 2012-2016 ACS (5yr)

Table V-45 Regional Disproportionate Housing Needs
HUD table 9 is based on Comprehensive Housing Affordability Strategy (CHAS) data. HUD’s definition of “housing problems” includes: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30% of household income. Housing problems defined as “severe” include the same issues of incomplete facilities and overcrowding, but include cost burden greater than 50% of the household income.

Across the region Native American households have the highest percentage of households experiencing problems and the highest percentage of severe housing problems. Hispanic and black households also have higher percentages of problems.
and severe housing problems. Non-family households experience the highest amount of household problems followed by households with five or more people.

**OMAHA**

**Table V-46 Demographics of Disproportionate Housing Needs Omaha**

<table>
<thead>
<tr>
<th>Disproportionate Housing Needs</th>
<th># with problems</th>
<th># households</th>
<th>% with problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race/Ethnicity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>36,035</td>
<td>125,140</td>
<td>28.80%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>10,705</td>
<td>21,485</td>
<td>49.83%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6,885</td>
<td>13,345</td>
<td>51.59%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>1,300</td>
<td>3,644</td>
<td>35.68%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>369</td>
<td>733</td>
<td>50.34%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>1,380</td>
<td>2,820</td>
<td>48.94%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>56,640</td>
<td>167,120</td>
<td>33.89%</td>
</tr>
</tbody>
</table>

| Household Type and Size       |                |             |                 |
| Family households, <5 people  | 21,125         | 82,724      | 25.66%          |
| Family households, 5+ people  | 7,285          | 16,600      | 43.89%          |
| Non-family households         | 28,130         | 67,800      | 41.49%          |

<table>
<thead>
<tr>
<th>Households experiencing any of 4 Severe Housing Problems</th>
<th># with severe problems</th>
<th># households</th>
<th>% with severe problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race/Ethnicity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>16,905</td>
<td>125,140</td>
<td>13.51%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>6,120</td>
<td>21,485</td>
<td>28.48%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4,355</td>
<td>13,345</td>
<td>32.63%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>830</td>
<td>3,644</td>
<td>22.78%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>290</td>
<td>733</td>
<td>39.55%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>694</td>
<td>2,820</td>
<td>24.61%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>29,185</td>
<td>167,120</td>
<td>17.46%</td>
</tr>
</tbody>
</table>

Source: HUD Table 9, CHAS

In Omaha, Hispanic households have the highest percentage of households with problems at 51.59%. About 50% of Native American and Black households have housing problems. Native Americans have the highest percentage of severe housing.
problems, followed by Hispanic and Black households. Households with five or more people have the highest percentage of household problems in Omaha at 43.89%.

Discussions with organizations who serve the Native American tribes who are living in Omaha have expressed a concern with housing security. The displacement of local tribal members based on rising housing costs and over the several decades has created a trend of Native American Households returning to reservations to find housing and other resources. As mentioned in previous sections, Native Americans also experience the highest amount of housing problems across the region and in the Omaha jurisdiction.

Activities included in the community engagement process, asked residents in Omaha to select the most needed types of housing in order to gain feedback on housing need. The top three most commonly requested housing types across all events were single family affordable, elderly affordable, and multifamily affordable.
Table V-47 Disproportionate Housing Needs Council Bluffs

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Households experiencing any of 4 housing problems</th>
<th># with problems</th>
<th># households</th>
<th>% with problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>6,729</td>
<td>22,328</td>
<td>30.14%</td>
<td></td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>124</td>
<td>274</td>
<td>45.26%</td>
<td></td>
</tr>
<tr>
<td>Hispanic</td>
<td>679</td>
<td>1,428</td>
<td>47.55%</td>
<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>50</td>
<td>118</td>
<td>49.15%</td>
<td></td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>20</td>
<td>44</td>
<td>45.45%</td>
<td></td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>189</td>
<td>335</td>
<td>57.61%</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>7,800</td>
<td>24,520</td>
<td>31.81%</td>
<td></td>
</tr>
</tbody>
</table>

Source: HUD Table 9, CHAS

According to Table 9, Other, Non-Hispanics experience more household problems than any other race/ethnicity with 57.61%. Asian or Pacific Islander, Non-Hispanics also have a higher percentage of household problems with 49.15%. These two groups also have a higher percent with severe cost burden with 50.75% and 45.45% respectively. For severe housing problems, White, Non-Hispanic experiences significantly less problems than all other races. Asian-Pacific Islander, Non-Hispanic and Native American, Non-Hispanic make up a total of 1.13% (704 people) of the city’s population but nearly half of both populations experience housing problems with Native-Americans experiencing four severe housing problems.

BELLEVUE
HUD defines housing issues as one or more of the following: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30 percent. According to HUD AFFH Table 9 in the City of Bellevue, 27 percent or 5,215 of the 19,645 households experience housing problems and 13 percent or 2,635 households experience severe housing problems. These numbers are slightly less than the Omaha-Council Bluffs metro area.

Table V-48 Demographics of Households with Disproportionate Housing Needs

<table>
<thead>
<tr>
<th>Disproportionate Housing Needs</th>
<th>Bellevue Jurisdiction</th>
<th>Omaha-Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Households experiencing any of 4 housing problems</td>
<td># with problems</td>
<td># households</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>3,740</td>
<td>15,780</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>435</td>
<td>1,299</td>
</tr>
<tr>
<td>Hispanic</td>
<td>814</td>
<td>1,833</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>85</td>
<td>304</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>54</td>
<td>79</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>83</td>
<td>343</td>
</tr>
<tr>
<td>Total</td>
<td>5,215</td>
<td>19,645</td>
</tr>
<tr>
<td>Household Type and Size</td>
<td># with severe problems</td>
<td># households</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>Family households, &lt;5 people</td>
<td>2,425</td>
<td>11,715</td>
</tr>
<tr>
<td>Family households, 5+ people</td>
<td>770</td>
<td>2,249</td>
</tr>
<tr>
<td>Non-family households</td>
<td>2,025</td>
<td>5,685</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Households experiencing any of 4 Severe Housing Problems</th>
<th># with severe problems</th>
<th># households</th>
<th>% with severe problems</th>
<th># with severe problems</th>
<th># households</th>
<th>% with severe problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race/Ethnicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>1,795</td>
<td>15,780</td>
<td>11.38%</td>
<td>32,668</td>
<td>280,218</td>
<td>11.66%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>215</td>
<td>1,299</td>
<td>16.55%</td>
<td>6,817</td>
<td>25,625</td>
<td>26.60%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>453</td>
<td>1,833</td>
<td>24.71%</td>
<td>5,726</td>
<td>19,697</td>
<td>29.07%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>75</td>
<td>304</td>
<td>24.67%</td>
<td>1,128</td>
<td>5,864</td>
<td>19.24%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>50</td>
<td>79</td>
<td>63.29%</td>
<td>428</td>
<td>1,102</td>
<td>38.84%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>60</td>
<td>343</td>
<td>17.49%</td>
<td>1,104</td>
<td>4,669</td>
<td>23.65%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2,635</strong></td>
<td><strong>19,645</strong></td>
<td><strong>13.41%</strong></td>
<td><strong>47,840</strong></td>
<td><strong>337,160</strong></td>
<td><strong>14.19%</strong></td>
</tr>
</tbody>
</table>
Data Sources: CHAS
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Although Native American households make up the smallest percentage of Bellevue households, they experience significantly higher rates of housing problems compare to other race and ethnicities. Sixty-eight (68) percent of Native American households and 44 percent of Hispanic households face housing problems while only 23 percent of White households have housing problems.

The majority of households in Bellevue have less than five people and face the least housing problems as shown in HUD AFFH Table 10. Non-family households have the most housing problems at 35 percent followed closely by family households with more than five people with 34 percent.

Native American households also face the highest percentage of severe housing problems. Severe housing problems are the same as the housing problems, but with cost burden greater than 50%.

Table V-49 Demographics of households with Severe Housing Cost Burden

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Bellevue Jurisdiction</th>
<th>Omaha-Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># with severe cost burden</td>
<td># households</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>1,540</td>
<td>15,780</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>205</td>
<td>1,299</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---</td>
<td>-----</td>
</tr>
<tr>
<td>Hispanic</td>
<td>295</td>
<td>1,833</td>
</tr>
<tr>
<td>Asian or Pacific</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Islander, Non-Hispanic</td>
<td>35</td>
<td>304</td>
</tr>
<tr>
<td>Native American</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>50</td>
<td>79</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>45</td>
<td>343</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2,170</td>
<td>19,645</td>
</tr>
</tbody>
</table>

**Household Type and Size**

<p>| | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Family households,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;5 people</td>
<td>1,009</td>
<td>11,715</td>
<td>8.61%</td>
<td>15,899</td>
<td>187,371</td>
</tr>
<tr>
<td>Family households,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5+ people</td>
<td>209</td>
<td>2,249</td>
<td>9.29%</td>
<td>3,340</td>
<td>34,078</td>
</tr>
<tr>
<td>Non-family households</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>929</td>
<td>5,685</td>
<td>16.34%</td>
<td>21,013</td>
<td>115,732</td>
</tr>
</tbody>
</table>

*Data Sources: CHAS*

*Note 1: Severe housing cost burden is defined as greater than 50% of income.*

As with housing problems, Native American Households face far more severe housing cost burden in Bellevue. Of the 79 Native American households in Bellevue, 50 are faced with severe cost burden, which is paying more than 50 percent of household income on housing cost. This is significantly higher percentage than the metro area as a whole.

Again, non-family households are more severely cost burdened than family households, but percentages are closer, only a difference of 8 percent.
b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

OMAHA

Figure V-100 Omaha Percentage of Housing Problems and Race/Ethnicity
The majority of census tracts with 40% or more of households with housing problems are east of 72nd street. Northeast Omaha has the highest percentage of households with housing problems. Areas with highest concentrations of minority households, including R/ECAP tracts also have the highest percentage of housing problems. For example, 63.58% of households or 480 units in R/ECPAP census tract 59.02 have housing problems. Similarly, census tracts in Northeast and Southeast Omaha with highest percentage of housing problems also have the highest populations of persons born outside of the US.

**Figure V-101 Omaha Percentage of Housing Problems and National Origin**
COUNCIL BLUFFS

Based on Map 6, areas with the highest housing burdens are US Census Tracts 304.01, 307, and 309. As stated previously, these census tracts also include the highest poverty neighborhoods, higher levels of racial/ethnic concentration, and the highest environmental health concerns. Additionally, Census Tract 307 shows a higher concentration of individuals with a national origin of Mexico than other tracts.

These areas show a percentage of households with any four housing problems greater than 46.11%. Housing problems is defined by HUD includes housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding.

Figure V-102 Housing Burdens by Census Tract Council Bluffs
Bellevue

AFFH Map 9 show residential living patterns for persons by race/ethnicity and national origin overlaid on shading indicating the percentage of households experiencing one or more housing problems.

The areas on the map indicating higher percentages of housing problems are Offutt Air Force Base and privatized military housing. None of the identified national origins are living in areas with housing problems of 35 percent and higher. The indication of housing burden above 46 percent could be due to the inclusion of enlisted dormitories as the majority of the housing in this area which are occupied by single airmen.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.
### Table V-50 Publicly Supported Housing by Program Category

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Omaha Jurisdiction</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Households in 0-1 Bedroom Units</td>
<td>Households in 2 Bedroom Units</td>
<td>Households in 3+ Bedroom Units</td>
<td>Households with Children</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Housing</td>
<td>1,464</td>
<td>372</td>
<td>811</td>
<td>986</td>
<td>36.86%</td>
<td></td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>601</td>
<td>237</td>
<td>115</td>
<td>271</td>
<td>28.29%</td>
<td></td>
</tr>
<tr>
<td>Other Multi-family</td>
<td>186</td>
<td>8</td>
<td>0</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>HCV Program</td>
<td>1,266</td>
<td>1,471</td>
<td>1,910</td>
<td>2,642</td>
<td>55.50%</td>
<td></td>
</tr>
</tbody>
</table>

Source: HUD Table 11, APSH

According to HUD table 11, children reside in 36.86% of households within Public Housing, 28.29% of Project-Based Section 8, and 55.50% of households accessing the Housing Choice Voucher (HCV) program. Although many households with a need for publicly supported housing have children, the largest percentages of Public Housing, Project-Based Section 8 housing, and other multi-family housing units are 0-1 bedrooms.

### COUNCIL BLUFFS

In Council Bluffs, 184 households with children are in project-based Section 8 housing and 225 are in homes with housing choice vouchers (HCV) for a total of 439 households with children in publicly supported housing. Table 9 outlines that 45.50% of families with
households of five or more have household problems. This is a significantly higher proportion of households compared to families of less than five (24.18%) or non-family households (40.43%).

The city’s publicly supported housing does not house families that have more than two occupants. There are other subsidized housing units within the City of Council Bluffs that house more than two occupants. The majority of families reside in the west end of Council Bluffs. The City of Council Bluffs does not have a lack of stock in housing that is suitable for families, except there is a lack of housing suitable for large families. There have been families who have received a Housing Choice Voucher from the Municipal Housing Agency of Council Bluffs, and are unable to find housing that is large enough and is affordable.

**Table V-51 Public Housing Types by Program Category: Units by Number of Bedrooms and Number of Children**

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Households in 0-1 Bedroom Units</th>
<th>Households in 2 Bedroom Units</th>
<th>Households in 3+ Bedroom Units</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># %</td>
<td># %</td>
<td># %</td>
<td># %</td>
</tr>
<tr>
<td>Public Housing</td>
<td>288 100.00%</td>
<td>0 0.00%</td>
<td>0 0.00%</td>
<td>N/a N/a</td>
</tr>
<tr>
<td>Project-Based</td>
<td>217 47.48%</td>
<td>134 29.32%</td>
<td>81 17.72%</td>
<td>184 40.26%</td>
</tr>
<tr>
<td>Section 8</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>44 97.78%</td>
<td>0 0.00%</td>
<td>0 0.00%</td>
<td>N/a N/a</td>
</tr>
<tr>
<td>HCV Program</td>
<td>148 24.46%</td>
<td>237 39.17%</td>
<td>195 32.23%</td>
<td>255 42.15%</td>
</tr>
</tbody>
</table>

Note 1: Data Sources: APSH
Table V-52 below shows publicly supported housing by program category with units by number of bedrooms and number of children.

### Table V-52

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Households in 0-1 Bedroom Units</th>
<th>Households in 2 Bedroom Units</th>
<th>Households in 3+ Bedroom Units</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td>0 0.00%</td>
<td>19 42.22%</td>
<td>23 51.11%</td>
<td>35 77.78%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>179 58.69%</td>
<td>54 17.70%</td>
<td>70 22.95%</td>
<td>109 35.74%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>N/a N/a</td>
<td>N/a N/a</td>
<td>N/a N/a</td>
<td>N/a N/a</td>
</tr>
<tr>
<td>HCV Program</td>
<td>36 26.28%</td>
<td>36 26.28%</td>
<td>50 36.50%</td>
<td>63 45.99%</td>
</tr>
</tbody>
</table>

Source HUD Table 11

Note 1: Data Sources: APSH (A Picture of Subsidized Households)

Households with children make up over 75 percent of households in public housing. There are 35 households are in public housing; only 42 units are available. Almost half of the HCV program participants are households with children. For Project-Based Section 8 Housing, 35 percent of units are occupied by households with children while 40 percent...
of the housing units have 2 bedrooms or more. This illustrates the need for affordable housing for households with children.

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

Regional and Jurisdictional Homeownership and Rental Rates by Race/Ethnicity

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Percentage of households Region</th>
<th>Percentage of households Omaha</th>
<th>Percentage of households Council Bluffs</th>
<th>Percentage of households Bellevue</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Own</td>
<td>Rent</td>
<td>Own</td>
<td>Rent</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>89.13%</td>
<td>71.05%</td>
<td>83.99%</td>
<td>62.02%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>4.14%</td>
<td>14.54%</td>
<td>7.27%</td>
<td>20.71%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4.26%</td>
<td>9.00%</td>
<td>6.19%</td>
<td>10.51%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>1.25%</td>
<td>2.71%</td>
<td>1.18%</td>
<td>3.60%</td>
</tr>
<tr>
<td>Native American</td>
<td>0.21%</td>
<td>0.54%</td>
<td>0.27%</td>
<td>0.66%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>0.99%</td>
<td>2.17%</td>
<td>1.11%</td>
<td>2.49%</td>
</tr>
<tr>
<td>Total % Household Units</td>
<td>73%</td>
<td>27%</td>
<td>59%</td>
<td>41%</td>
</tr>
<tr>
<td>Total # Household Units</td>
<td>224,970</td>
<td>112,190</td>
<td>97,745</td>
<td>67,375</td>
</tr>
</tbody>
</table>

Source: HUD Table 16 Homeownership and Rental Rates by Race/Ethnicity

Across the region and in each jurisdiction, White households are the only demographic with a higher percentages of homeowners than renters. For every other race and/or ethnicity, there are on average at least twice as many households renting rather than owning their home.
The table below provides information on the eight county Metropolitan Statistical Area (MSA) between 2010 and 2015 for White, Black, and Hispanic households.

**Figure V-103 Regional Homeownership Rates by Race/Ethnicity**

![Bar chart showing regional homeownership rates by race/ethnicity from 2000 to 2015.](image)

Source: HUD Data, Earl Redrick

The percentage of White households owning homes is nearly double the percentage of homeowners in Black and Hispanic households. Between 2000 and 2015 there is decline in ownership among Black households.
Table V-54 2015 Regional MSA Demographics and Home Mortgage Loan Origination Data

<table>
<thead>
<tr>
<th>Demographic Race/Ethnicity</th>
<th>NE/IA MSA Population</th>
<th>% of Total MSA Population</th>
<th># of Loan Originations by Race/Ethnicity</th>
<th>% of Total Loan Originations by Race/Ethnicity</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>756,180</td>
<td>81.03</td>
<td>13,111</td>
<td>90.55</td>
</tr>
<tr>
<td>Black</td>
<td>69,641</td>
<td>7.46</td>
<td>340</td>
<td>2.35</td>
</tr>
<tr>
<td>Hispanic</td>
<td>86,076</td>
<td>9.22</td>
<td>634</td>
<td>4.38</td>
</tr>
<tr>
<td>Asian/PI</td>
<td>21,374</td>
<td>2.29</td>
<td>394</td>
<td>2.72</td>
</tr>
<tr>
<td>Total</td>
<td>933,271</td>
<td>100</td>
<td>14,479</td>
<td>100</td>
</tr>
</tbody>
</table>

Source: Home Mortgage Disclosure Act, Credit Earl Redrick

There are also differences in the number of home mortgages based on race and/or ethnicity across the eight county Metropolitan Statistical Area (MSA). The table above provides a comparison of the percentage of the total population of the MSA and the percentage of households who originated home mortgage loans. According to 2015 data, White residents account for 81.03% of the MSA population but originated over 90% of loans for homes in the area. 7.46% of the population identifies as Black, but black households only made up 2.35% of home mortgage loans. Over 9% of the MSA population is Hispanic, but only 4.38% of home mortgage loans originated were Hispanic households. Asian and/or Pacific Islander families had the most accurate representation based on, accounting for 2.29% of the MSA population and 2.72% of the home mortgage loans.
OMAHA

Table V-55 Omaha Comparison of Homeowners and Renters by Race/Ethnicity

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Own</th>
<th>Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>83.99%</td>
<td>62.02%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>7.27%</td>
<td>20.71%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6.19%</td>
<td>10.51%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>1.18%</td>
<td>3.60%</td>
</tr>
<tr>
<td>Native American</td>
<td>0.27%</td>
<td>0.66%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>1.11%</td>
<td>2.49%</td>
</tr>
</tbody>
</table>

| Total % Household Units        | 59%     | 41%     |
| Total # Household Units        | 97,745  | 67,375  |

Source: HUD Table 16 Homeownership by Race/Ethnicity

Similar to the NE-I A Region, minority households in Omaha are at least twice as likely to rent rather than own their home. According to the most recent US Census Bureau Comparative Housing Characteristics data (2012-2016 ACS 5yr), 75% of homeowners with a mortgage in Douglas County pay less than 30% of their monthly household income on mortgages, real estate taxes, various insurances and fees. Across the County, 47.8% of those same homeowners list these ownership costs as less than 20% of their household income. Measuring the same costs, 86% percent of homeowners without a mortgage pay less than 30% of their household income on owner costs, and 74% of those same homeowners are paying 20% or less of their household income on owner-related costs. According to the same data source, only 51% of renters in Douglas County are paying less than 30% of their household income on rent. Only 27% of those households are paying a monthly rent that makes up less than 20% of their household income.

According to HUD data, minority households are twice as likely to rent than own, and according to Census Bureau data the percentage of renters who are paying less than 30% of their household income on housing is much lower than for those who own their
home. It is likely based on this information that minority households who are renting their homes have greater difficulty attaining housing that is considered “affordable” or at a cost less than 30% of their average monthly household income.

COUNCIL BLUFFS

The housing stock in Council Bluffs varies in construction from the late 1800s to the present. With approximately 27,000 housing units, the City has an estimated 19,000 single-family units and 8,000 two-family and multi-family units. Of the 27,000 units, approximately 24,750 (37.1%) are owner-occupied, 15,500 are rental (11.2%) and the remaining are vacant (2.4%).

The median mortgage for Council Bluffs is $1,140 per month with 21.5% of households spending 35.0% or more of the household income on a mortgage payment. This is slightly higher than the Omaha-Council Bluffs Metropolitan area, which averages $1,013 per month. The median rent per month for the City is $694 with 38.8% of households spending 35.0% or more of the household income on rent. In the Omaha-Council Bluffs Metropolitan area, the average rent for a one bedroom in the city center is $905.25 per month in the city center or $683.93 per month outside the center. This aligns with the rents for Council Bluffs.

Table V-56 Homeownership and Rental Rates by Race/Ethnicity

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Council Bluff Jurisdiction</th>
<th>Omaha-Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Homeowners</td>
<td>Renters</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>14,670</td>
<td>7,640</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>80</td>
<td>200</td>
</tr>
<tr>
<td>Hispanic</td>
<td>720</td>
<td>715</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>54</td>
<td>65</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>130</td>
<td>210</td>
</tr>
<tr>
<td>Total Household Units</td>
<td>15,675</td>
<td>8,845</td>
</tr>
</tbody>
</table>

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

According to American FactFinder 2010 Census data, White/Non-Hispanic families live in 58.5% of the owner-occupied houses. Hispanics live in 2.7% of owner-occupied
units. Other Races include Black/Non-Hispanic (0.3%), American Indian/Non-Hispanic (0.1%), Asian/Non-Hispanic (0.3%), and two or more races (0.4%). For renter-occupied units, 36.4% are Non-Hispanic and 2.4% are Hispanic. White/Non-Hispanic households make up 34.5% of total renter-occupied units and additional units are occupied by Black/Non-Hispanic (0.9%), American Indian/Non-Hispanic (0.2%), Asian/Non-Hispanic (0.2%), and two or more races (0.6%).

**BELLEVUE**

Table V-57 below has data regarding homeownership and rental rates by race and ethnicity.

**Table V-57 Bellevue Homeownership and Rental Rates**

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Bellevue Jurisdiction</th>
<th>Omaha-Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Homeowners</td>
<td>Renters</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>11,120</td>
<td>4,670</td>
</tr>
<tr>
<td></td>
<td>83.64%</td>
<td>73.54%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>670</td>
<td>635</td>
</tr>
<tr>
<td></td>
<td>5.04%</td>
<td>10.00%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,115</td>
<td>720</td>
</tr>
<tr>
<td></td>
<td>8.39%</td>
<td>11.34%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>145</td>
<td>155</td>
</tr>
<tr>
<td></td>
<td>1.09%</td>
<td>2.44%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>10</td>
<td>70</td>
</tr>
<tr>
<td></td>
<td>0.08%</td>
<td>1.10%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>240</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>1.81%</td>
<td>1.57%</td>
</tr>
</tbody>
</table>
In Bellevue, the majority of households are homeowners, or 67.6 percent. This is similar to the region with a homeowner rate of 66.7 percent. Whites and Other non-Hispanic races are more likely to own their home while Blacks, Hispanics, Asian and Native Americans are more likely to rent. Blacks are two times more likely to rent than own a home, which is similar for Native Americans. This is similar to the surrounding region, except for Hispanics which are more likely to own in Bellevue rather than the surrounding area.

<table>
<thead>
<tr>
<th>Total Household Units</th>
<th>13,295</th>
<th>-</th>
<th>6,350</th>
<th>-</th>
<th>224,970</th>
<th>-</th>
<th>112,190</th>
<th>-</th>
</tr>
</thead>
</table>

*Source: HUD Table 12, Data Source CHAS*
2. Additional Information

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

OMAHA

Figure V-104 Omaha Comparison of Units of Rent to Number of Households by Income

![Bar chart showing the comparison of rental units to household incomes in Omaha.](chart)

Source: U.S. Census Bureau, 2016 ACS Data (5yr)

Figure V-104 above compares the number of rental units available in Omaha by price range in blue, and average annual household incomes of renters in red. The graphs paired side by side show the number of rental units (to the far left) that would be available at a monthly rental rate considered affordable (at or near 30%) for the corresponding household incomes (locate below each pair of graphs).
According to the data, there is a shortage of rental housing that would be affordable for households earning $19,000 annually or less. There is also a lack of units that are priced at or near 30% for households who earn $50,000 to $150,000 or more. The mismatch is more significant for households earning less than $9,999 and more than $75,000.

For households who earn between $20,000 and $49,000, many more units are priced in a range considered affordable. However, it is likely that many of the households earning $75,000 to $150,000 or more are renting units priced at a monthly rate that is less much than 30% based on the lack of units that are available at $2,000 or more a month. With an average annual household income in Omaha of $50,827, it is likely that many persons are renting below affordability. In addition, many of the households who make $19,000 are likely renting units that are more than 30% of their annual household income because of the lack of housing available for their households.

The shortage of rental units for households making less than $19,000 annually may be impacting minority households at a higher rate than white households in Omaha. Although the specific data on race/ethnicity for renter households is not provided, as discussed in previous sections, minority households are twice as likely to rent rather than to own their home. HUD maps identifying affordability of rental housing show the most affordable units are located in areas (east of 42nd Street) with high concentrations of non-white households. The highest rates of unemployment and poverty have also been identified in R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty). It is likely that the lack of affordable rental units for low income households is disproportionately impacting minority families in the Omaha area.

Additional considerations for protected classes and disproportionate housing needs include the lack of affordable housing for large families and accessible housing for the disability community. As mentioned in previous sections, Omaha has a large refugee and new immigrant population. Based on interviews and meetings with persons working to assist these populations, there is a need for affordable housing that would accommodate large families and multi-generational families. According to Table V-44 shown at the beginning of this section, only 4.9% of the units available in Douglas County have 5 bedrooms or more. Challenges to preserving and creating more housing that can accommodate large families were discussed in stakeholder meetings. The rehabilitation cost of the current housing stock with 5 bedrooms or more is very expensive, especially for older housing stock that often requires considerations for lead and asbestos. New construction of homes with 5 bedrooms or more for low to moderate income families is difficult to produce at affordable costs even when including support from federal housing subsidies.
The disability community is also experiencing issues with housing security. According to the Douglas County Housing Authority, apartments that are subsidized and accessible for persons with disabilities under the age of 62 generally have longer waiting lists. There are more units available for people over the age of 62 regardless of disability status. In the recent decade, private landlords that are willing to accept Housing Choice Vouchers (HCV) have been decreasing. With disability preference for HCV, as well as limited income, some disabled HCV still struggle to find housing in all areas. With there being only a limited number of landlords accepting this voucher as well as high housing costs, it can be difficult for the lowest income SSI person with a disability to meet the payment standard of those developments in the DCHA jurisdiction (west of 72nd St).

COUNCIL BLUFFS

It is very relevant within the Municipal Housing Agency’s Housing Choice Voucher Program that the City of Council Bluffs does not have enough homes to accommodate larger families. Those who have applied for the Municipal Housing Agency’s Housing Choice Voucher program are refugees who tend to have larger families. They struggle to find suitable, affordable housing to accommodate their larger families. The majority of housing that is available in the City of Council Bluffs is one-bedroom, two-bedroom, three-bedroom and four-bedroom homes.

BELLEVUE

Lending practices impact disproportionate housing needs. The Home Mortgage Disclosure Act (HDMA) data provided by the Consumer Financial Protection Bureau for 2015 was used to review home loan purchase approvals and denials to assist with identifying disparities in access to financial services. The Table below describes the loan denial rate by race in Bellevue.

**Figure V-58 Home Loan Origination Bellevue**

<table>
<thead>
<tr>
<th>Race</th>
<th>Total Loan Request</th>
<th>% of Total Loan Request</th>
<th># of Originated Loans</th>
<th># of Applications Denied</th>
<th>Denial Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>1,251</td>
<td>71.4%</td>
<td>1,172</td>
<td>79</td>
<td>6.3%</td>
</tr>
<tr>
<td></td>
<td>61</td>
<td>3.5%</td>
<td>57</td>
<td>7</td>
<td>11.4%</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>-----</td>
<td>------</td>
<td>-----</td>
<td>-----</td>
<td>--------</td>
</tr>
<tr>
<td>Black or African American</td>
<td>25</td>
<td>1.4%</td>
<td>23</td>
<td>2</td>
<td>8.0%</td>
</tr>
<tr>
<td>Asian</td>
<td>4</td>
<td>0.2%</td>
<td>4</td>
<td>0</td>
<td>-</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>9</td>
<td>0.5%</td>
<td>9</td>
<td>0</td>
<td>-</td>
</tr>
<tr>
<td>Information not provided by applicant</td>
<td>109</td>
<td>6.2%</td>
<td>93</td>
<td>16</td>
<td>14.7%</td>
</tr>
<tr>
<td>Not applicable</td>
<td>294</td>
<td>16.8%</td>
<td>294</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>1,753</td>
<td>100%</td>
<td>1,652</td>
<td>104</td>
<td></td>
</tr>
</tbody>
</table>

SOURCE: HDMA 2015

With such a significant number of applicants not providing information and not applicable, the percentage of loan request by rate is difficult to accurately determine. Of those who provided information, individuals who identified as white had the highest number of loan request with 71 percent followed by Blacks with 3.5 percent. Individuals who identified as American Indian and Native Hawaiian had a 0 percent denial rate while Blacks had a denial rate of 11 percent. White applicants experienced a denial rate of 6 percent.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.

**OMAHA**

**OHA**

Non-family heads of household (HHs) represent more than one-third of total HHs in our region. These are single-person HHs or HHs of 2+ unrelated persons. This population has disproportionately high housing needs: 40% of these HHs experience one of 4 housing problems; 18% experience severe housing cost burden. Single-person HHs
(and other families who require only 1 bedroom) represent 40%+ of OHA’s public housing list. OHA’s waiting lists are good indicator of housing needs for low income families in the metro area.

In Omaha, persons with criminal backgrounds have been identified as a population struggling to establish housing security. This population will have difficulty meeting screening requirements for OHA (and likely other publicly subsidized housing) and may have limited affordable housing options otherwise.

**DCHA**

At DCHA waiting lists for units of 3 and 4 bedroom status are very long, often taking years before a unit has become available. Applicants often accept smaller unit that still meets occupancy standards as it is available long before the appropriate size unit is.

**COUNCIL BLUFFS**

The City and the Municipal Housing Agency received a great deal of feedback that there is a lack of affordable units in a range of sizes. The City of Council Bluffs and the Municipal Housing Agency have developed a goal, alongside the regional partners throughout Omaha to address the issue of lack of availability of affordable units in a range of sizes.

**BELLEVUE**

According to the 2011-2015 ACS, the majority of housing units in Bellevue have 3 bedrooms or less. These units make up 81% of the housing units available. Only 19% of housing units in Bellevue have 4 bedrooms or more. The number of housing units with more than four bedrooms is limited and affects larger families’ ability to find affordable housing units.
3. Contributing Factors of Disproportionate Housing Needs

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

OMAHA
- Availability of affordable units in a range of sizes
- Deteriorated and abandoned properties
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Source of income discrimination
- Lending discrimination
- Displacement of residents due to economic pressures

COUNCIL BLUFFS

Disproportionate Housing Needs
1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Lack of local or regional cooperation

BELLEVUE

Availability of affordable units in a range of sizes:
Smaller families with fewer than five members are much less likely to have housing problems than large family and non-family households. With limited numbers of public housing units available, families of five or more may face more housing problems than small families.

According to the 2011-2015 ACS, the majority of housing units in Bellevue have 3 bedrooms or less and make up 81% of the housing units available. Only 19% of
housing units in Bellevue have 4 bedrooms or more. The number of housing units with more than four bedrooms is limited and affects larger families’ ability to find affordable housing units.

Native American households while the smallest racial group in Bellevue face the highest percentage of severe housing cost burden and housing problems. Native American households are also more likely to renter than own.

The City of Bellevue has assistance for elderly and disabled owner-occupied households to address housing rehabilitation such as kitchen and plumbing issues, but this does not assist with overcrowding or cost burden.

Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 454 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. According to Bellevue Housing Authority, the placement of larger families is difficult due to limited available units with four bedrooms or more.

Lending Discrimination:
HDMA data shows that Black applicants have a denial rate almost twice that of White applicants. Black households are twice as likely to rent rather than own a home. Of the total Black households in Bellevue 10% are renters and 5% are homeowners.

Black households are scattered through the jurisdiction, with no data indicating segregated areas of Black households nor a significant number of Black households in the areas of higher poverty. Data does show that Black households below the federal poverty line have less access to school and lower indices regarding labor market engagement. As identified above, Black Households are more likely to live in high poverty neighborhood

Lack of private investment in specific neighborhoods:
With focus on the future growth of the Highway 34 corridor in southern Bellevue, the City will have to look at additional housing, job trainings, and transportation options to encourage development and employment opportunities. The majority of the established areas, specifically north of Olde Towne Bellevue and east of Fort Crook Road, are residential zoned and have limited commercial and retail space. Development is the older eastern areas of Bellevue are limited by lot availability/size and commercial zoning availability.
Source of Income Discrimination: Many Housing Choice Voucher holders have a hard
time finding appropriate housing that will lease to Voucher Holders. Despite education
and outreach from the Housing Authority staff, this continues with several large
management companies in the jurisdiction.

C. Publicly Supported Housing Analysis

1. Analysis

This section provides the HUD-required analysis of publicly supported housing
programs located in the jurisdiction of Omaha and the Omaha/Council Bluffs region.
More than 11,000 households in the region receive publicly supported housing
assistance. Nearly 75% of these assisted households reside within the jurisdiction of
Omaha. This section examines the characteristics of assisted households and their
location, within the jurisdiction and the region, for the purpose of identifying barriers to
housing choice, and more importantly, to guide planning for actions to expand housing
choice and access to opportunity for our region’s low-income families.

This analysis generally relies on the HUD-provided data from HUD’s AFFH maps and
tables. The data provided by HUD for publicly supported housing programs has
limitations, as HUD has acknowledged.

Where HUD’s data is inconsistent with local knowledge or other local sources, our
analysis notes the discrepancies. For our region, we’ve generally found that even
where the HUD data has limitations, it supports the same conclusions that we would
determine based on local knowledge and local data sources. There may be
discrepancies in the precise counts or percentage points but, unless these
discrepancies are significant, this analysis relies on the HUD provided data.

<table>
<thead>
<tr>
<th>Important Definitions for Public Housing Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMI</td>
</tr>
<tr>
<td>BHA</td>
</tr>
<tr>
<td>DCHA</td>
</tr>
<tr>
<td>FMR</td>
</tr>
</tbody>
</table>
a. Publicly Supported Housing Demographic

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

**OMAHA**

**OHA:**

Publicly supported housing serves more than 8,000 households in the Omaha jurisdiction. More than 85% of these households are assisted through the HCV and public housing programs. These two programs predominantly serve Black households. Black households represent 73% of HCV program participants and 68% of public housing households.

White households are more likely to be served by the jurisdiction’s project-based Section 8 and other multi-family housing programs. However, within the jurisdiction of Omaha, these programs comprise only approximately 1,100 households, less than 15% of the jurisdiction’s public supported households.

Hispanic households are under-served in every publicly supported housing program, as are Asian/Pacific Islander households (discussed more fully in Section C.1.a.iii.). The number of Asian/Pacific Islander households served by the jurisdiction’s publicly supported housing programs is too small (12 households) to provide comparisons between the programs.

| Table V-59 Omaha Race/Ethnicity of Publicly Supported Households by Program |
|---------------------------------|----------|-------|--------|---------|--------|---------|
|                                 | WHITE    | BLACK | HISPANIC | ASIAN/PI | TOTAL  | % TOTAL |
| PUBLIC HOUSING                  | 24%      | 68%   | 6%       | 0.38%    | 2,626  | 31%     |
Table 2, below, is based on the same data as Table 1, but asks a different question: Given an assisted household’s race or ethnicity, which program is likely to serve them? Among assisted households, both White and Black households are most likely to be served by the HCV program, which is appropriate, given that the HCV program is the largest source of publicly supported housing assistance in the jurisdiction. The percentage of White households and Black households receiving HCV program assistance is roughly 20% higher or more than their participation in the public housing program.

Hispanic households do not follow this trend. Hispanic households are more likely to be supported by the public housing program, and less likely to be supported by the HCV program.

Table V-60 Omaha Program Utilization by Race/Ethnicity of Assisted Households

<table>
<thead>
<tr>
<th></th>
<th>WHITE</th>
<th>BLACK</th>
<th>HISPANIC</th>
<th>ASIAN/PI</th>
<th>TOTAL</th>
<th>% TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>PUBLIC HOUSING</td>
<td>26%</td>
<td>33%</td>
<td>44%</td>
<td>40%</td>
<td>2,626</td>
<td>31%</td>
</tr>
<tr>
<td>PROJECT-BASED SECTION 8</td>
<td>24%</td>
<td>5%</td>
<td>20%</td>
<td>12%</td>
<td>938</td>
<td>11%</td>
</tr>
<tr>
<td>OTHER MULTIFAMILY</td>
<td>5%</td>
<td>1%</td>
<td>1%</td>
<td>0%</td>
<td>188</td>
<td>2%</td>
</tr>
<tr>
<td>HOUSING CHOICE VOUCHERS</td>
<td>45%</td>
<td>62%</td>
<td>34%</td>
<td>48%</td>
<td>4,636</td>
<td>55%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>8,388</td>
<td>100%</td>
</tr>
</tbody>
</table>

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity
Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

DCHA:

Based on HUD maps, it appears that overall there is a large amount of white tenants in other categories of publicly supported housing. It appears that most of the black tenants are more densely populated in the Northeast service area, while the Hispanic, Asian, and other multiracial people are more consistently throughout the entire service area. Trends in the statistics show a rapidly increasing Hispanic and Asian population.

According to DCHA 2017 annual report, the following are the demographics of served population: 2,794 household participants (public housing and HCV) reported ethnicity being 54% White, 40% African American, 5% Hispanic, and 1% other. 31% of households employed part-time, 24% employed full-time, and 65% on Social Security income.

COUNCIL BLUFFS

The Municipal Housing Agency’s Public Housing properties are Dudley Court and Regal Towers. The MHA’s Public Housing properties mainly house elderly, disabled and near-elderly residents. The Municipal Housing Agency’s first preference for the waiting list is elderly and disabled individuals that currently reside in the city limits of Council Bluffs.

Figure V-61 Publicly Supported Households by Race/Ethnicity

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>White</th>
<th>%</th>
<th>Black</th>
<th>%</th>
<th>Hispanic</th>
<th>%</th>
<th>Asian or Pacific Islander</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Council Bluffs, IA CDBG) Jurisdiction</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Housing</td>
<td>272</td>
<td>96.11%</td>
<td>5</td>
<td>1.77%</td>
<td>6</td>
<td>2.12%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>371</td>
<td>86.68%</td>
<td>17</td>
<td>6.31%</td>
<td>23</td>
<td>5.37%</td>
<td>3</td>
<td>0.70%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>45</td>
<td>100.00%</td>
<td>0</td>
<td>0.00%</td>
<td>0</td>
<td>0.00%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>HCV Program</td>
<td>521</td>
<td>88.51%</td>
<td>43</td>
<td>7.34%</td>
<td>21</td>
<td>3.58%</td>
<td>1</td>
<td>0.17%</td>
</tr>
<tr>
<td>Total Households</td>
<td>22,328</td>
<td>91.06%</td>
<td>274</td>
<td>1.12%</td>
<td>1,428</td>
<td>5.02%</td>
<td>118</td>
<td>0.49%</td>
</tr>
<tr>
<td>0-30% of AMI</td>
<td>3,209</td>
<td>81.78%</td>
<td>125</td>
<td>3.71%</td>
<td>335</td>
<td>8.54%</td>
<td>24</td>
<td>0.61%</td>
</tr>
<tr>
<td>0-50% of AMI</td>
<td>5,594</td>
<td>75.76%</td>
<td>119</td>
<td>1.75%</td>
<td>570</td>
<td>7.22%</td>
<td>54</td>
<td>0.73%</td>
</tr>
<tr>
<td>0-80% of AMI</td>
<td>10,379</td>
<td>82.09%</td>
<td>164</td>
<td>1.30%</td>
<td>964</td>
<td>7.62%</td>
<td>68</td>
<td>0.51%</td>
</tr>
</tbody>
</table>

Note 1: Data Sources: Decennial Census; APSH; CHAS
Note 2: Numbers presented are numbers of households not individuals.
The Municipal Housing Agency manages no additional public housing units except for Dudley Court and Regal Towers. The Municipal Housing Agency does administer 677 housing choice vouchers and in addition, Municipal Housing Agency’s Housing Choice Voucher program has 20 VASH vouchers that are designated for homeless veteran applicants. The Municipal Housing Agency has strong ties with many different agencies throughout the community that provide support to those that are disabled and in need of assistance.

BELLEVUE

Table V-62 Publicly Supported Households by Race/Ethnicity

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Bellevue, NE</th>
<th>Race/Ethnicity</th>
<th>White</th>
<th>%</th>
<th>Black</th>
<th>%</th>
<th>Hispanic</th>
<th>%</th>
<th>Asian/Pacific islander</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td>28</td>
<td>White</td>
<td>28</td>
<td>66.67%</td>
<td>12</td>
<td>28.57%</td>
<td>1</td>
<td>2.38%</td>
<td>1</td>
<td>2.38%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>217</td>
<td>White</td>
<td>217</td>
<td>73.06%</td>
<td>48</td>
<td>16.16%</td>
<td>24</td>
<td>8.08%</td>
<td>4</td>
<td>1.35%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>N/a</td>
<td>White</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>HCV Program</td>
<td>75</td>
<td>White</td>
<td>75</td>
<td>63.03%</td>
<td>36</td>
<td>30.25%</td>
<td>5</td>
<td>4.20%</td>
<td>3</td>
<td>2.52%</td>
</tr>
<tr>
<td>Total Households</td>
<td>15,780</td>
<td>White</td>
<td>15,780</td>
<td>80.33%</td>
<td>1,299</td>
<td>6.61%</td>
<td>1,833</td>
<td>9.33%</td>
<td>304</td>
<td>1.55%</td>
</tr>
<tr>
<td>0-30% of AMI</td>
<td>1,435</td>
<td>White</td>
<td>1,435</td>
<td>70.86%</td>
<td>269</td>
<td>13.28%</td>
<td>184</td>
<td>9.09%</td>
<td>10</td>
<td>0.49%</td>
</tr>
<tr>
<td>0-50% of AMI</td>
<td>2,445</td>
<td>White</td>
<td>2,445</td>
<td>63.02%</td>
<td>364</td>
<td>9.38%</td>
<td>554</td>
<td>14.28%</td>
<td>65</td>
<td>1.68%</td>
</tr>
<tr>
<td>0-80% of AMI</td>
<td>5,370</td>
<td>White</td>
<td>5,370</td>
<td>71.46%</td>
<td>544</td>
<td>7.24%</td>
<td>924</td>
<td>12.30%</td>
<td>139</td>
<td>1.85%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Omaha-Council Bluffs Region</th>
<th>Race/Ethnicity</th>
<th>White</th>
<th>%</th>
<th>Black</th>
<th>%</th>
<th>Hispanic</th>
<th>%</th>
<th>Asian/Pacific islander</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td>1,824</td>
<td>White</td>
<td>1,824</td>
<td>31.13%</td>
<td>3,586</td>
<td>61.19%</td>
<td>327</td>
<td>5.58%</td>
<td>21</td>
<td>0.36%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>2,157</td>
<td>White</td>
<td>2,157</td>
<td>71.21%</td>
<td>610</td>
<td>20.14%</td>
<td>212</td>
<td>7.00%</td>
<td>16</td>
<td>0.53%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>380</td>
<td>White</td>
<td>380</td>
<td>76.00%</td>
<td>102</td>
<td>20.40%</td>
<td>10</td>
<td>2.00%</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>HCV Program</td>
<td>2,533</td>
<td>White</td>
<td>2,533</td>
<td>38.80%</td>
<td>3,747</td>
<td>57.39%</td>
<td>186</td>
<td>2.85%</td>
<td>24</td>
<td>0.37%</td>
</tr>
<tr>
<td>Total Households</td>
<td>280,218</td>
<td>White</td>
<td>280,218</td>
<td>83.11%</td>
<td>25,625</td>
<td>7.60%</td>
<td>19,697</td>
<td>5.84%</td>
<td>5,864</td>
<td>1.74%</td>
</tr>
<tr>
<td>0-30% of AMI</td>
<td>25,922</td>
<td>White</td>
<td>25,922</td>
<td>65.39%</td>
<td>7,732</td>
<td>19.50%</td>
<td>3,616</td>
<td>9.12%</td>
<td>823</td>
<td>2.08%</td>
</tr>
<tr>
<td>0-50% of AMI</td>
<td>45,627</td>
<td>White</td>
<td>45,627</td>
<td>58.37%</td>
<td>12,616</td>
<td>16.14%</td>
<td>7,589</td>
<td>9.72%</td>
<td>1,668</td>
<td>2.13%</td>
</tr>
<tr>
<td>0-80% of AMI</td>
<td>93,097</td>
<td>White</td>
<td>93,097</td>
<td>67.59%</td>
<td>17,725</td>
<td>12.87%</td>
<td>12,532</td>
<td>9.10%</td>
<td>2,569</td>
<td>1.87%</td>
</tr>
</tbody>
</table>

Note 1: Data Sources: Decennial Census; APH; CHAS  
Note 2: #s presented are numbers of households not individuals.

Source: HUD Table 6 Publicly Supported Housing

As provided by the HUD data Table 6, White households are most likely to reside in project-based Section 8 housing with 73%, but also are the highest percentage to reside
in Public Housing and Housing Choice Voucher Programs with 57% and 42% residency respectively. Black households are more likely to participate in housing choice vouchers with 40% while Hispanic households participate mostly in Project-Based Section 8. There are no “other-multi family” units listed for Bellevue.

Overall participation in Project Based Section 8 is roughly similar to the general population. In the HVC and Public Housing, Hispanics are underrepresented while Blacks are overrepresented.

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

OMAHA

OHA

In the Omaha/Council Bluffs region, more than 11,000 households receive publicly supported housing assistance. Omaha is the largest jurisdiction within the region, and nearly 75% of assisted households reside within the jurisdiction of Omaha. Only approximately 3,000 of the region’s assisted households reside outside the jurisdiction of Omaha. Because the jurisdiction of Omaha represents such a predominant share of assisted households in the region, analysis of assisted households in the region leads to similar patterns as identified above for the jurisdiction. Thus Table 3, below, breaks down racial/ethnic demographics of the region’s assisted households who reside within the jurisdiction of Omaha compared to households who reside outside the jurisdiction.

As Table 3 shows, outside the jurisdiction of Omaha, the region’s publicly supported housing programs predominantly serve White households. White households represent roughly 79% of the of the region’s assisted households who reside outside the jurisdiction of Omaha. This proportion is commensurate with the region’s demographics, as described below in Section C.1.a.iii., which show that roughly 80% of the region’s low income households who reside outside of the jurisdiction of Omaha are White households. But it is significantly different from the demographics of assisted
households who reside within the jurisdiction of Omaha, above all for the public housing and HCV programs.

The HCV program is the largest source of housing assistance in the region—both within the jurisdiction of Omaha and outside the jurisdiction. Although White households represent the large majority of the region’s assisted households who reside outside the jurisdiction of Omaha, roughly 20% of households who are assisted by the HCV program and who reside outside the jurisdiction are Black households. Also note that the percentage of Hispanic households assisted by the HCV program is largely identical (3%) both within the jurisdiction and outside the jurisdiction.

### Table V-63 Comparing Region and Jurisdiction Race/Ethnicity of Publicly Supported Housing

<table>
<thead>
<tr>
<th></th>
<th>WITHIN OMAHA JURISDICTION</th>
<th>OUTSIDE OMAHA JURISDICTION</th>
<th>OMAHA REGION TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>W</td>
<td>B</td>
<td>H</td>
</tr>
<tr>
<td>PUBLIC HOUSING</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>24%</td>
<td>68%</td>
<td>6%</td>
</tr>
<tr>
<td>PROJECT BASED SECTION 8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>64%</td>
<td>27%</td>
<td>8%</td>
</tr>
<tr>
<td>OTHER MULTIFAMILY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>71%</td>
<td>25%</td>
<td>3%</td>
</tr>
<tr>
<td>HOUSING CHOICE VOUCHERS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>24%</td>
<td>73%</td>
<td>3%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>29%</td>
<td>65%</td>
<td>4%</td>
</tr>
</tbody>
</table>

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

The Omaha/Council Bluffs region includes more than 335,000 households. White households represent the large majority (83%) of the region’s households. White households also represent the large majority of the region’s low-income households: roughly 68% of the region’s households with income less than 80% of AMI are White. Black households and Hispanic households represent a small proportion of the region’s households (8% and 6%, respectively), but are more likely to be low-income. Although Black households represent only 8% of the region’s population, they represent 13% of households with incomes less than 80% of AMI. Hispanic households represent
roughly 6% of the region’s households, but roughly 9% of the region’s low income households.

The City of Omaha is the largest jurisdiction within the region, and represents roughly half of the region’s households. White households represent the majority of low-income households within the City. But Black and Hispanic households represent a disproportionate share of the jurisdiction’s low-income households. Black households represent 13% of the jurisdiction’s households, but 20% of the jurisdiction’s low-income households, and 28% of extremely low income households (AMI 0-30%). Hispanic households represent 8% of the jurisdiction’s households, but roughly 11% of the jurisdiction’s low-income households. The jurisdiction of the City of Omaha is home to roughly half of the region’s households and roughly 75% of the region’s assisted households.

**Table V-64 Regional and Jurisdiction Comparison of Public Housing Demographics**

<table>
<thead>
<tr>
<th></th>
<th>WITHIN OMAHA JURISDICTION</th>
<th>OUTSIDE OMAHA JURISDICTION</th>
<th>OMAHA REGION TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>W</td>
<td>B</td>
<td>H</td>
</tr>
<tr>
<td>PUBLIC HOUSING</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>24%</td>
<td>68%</td>
<td>6%</td>
</tr>
<tr>
<td>PROJECT BASED SECTION 8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>64%</td>
<td>27%</td>
<td>8%</td>
</tr>
<tr>
<td>OTHER MULTIFAMILY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>71%</td>
<td>25%</td>
<td>3%</td>
</tr>
<tr>
<td>HOUSING CHOICE VOUCHERS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>24%</td>
<td>73%</td>
<td>3%</td>
</tr>
<tr>
<td>TOTAL ASSISTED HHs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL HOUSEHOLDS</td>
<td>75%</td>
<td>13%</td>
<td>8%</td>
</tr>
<tr>
<td>LOW INCOME HHs 0-30% AMI</td>
<td>55%</td>
<td>28%</td>
<td>11%</td>
</tr>
<tr>
<td>LOW INCOME HHs 0-50% AMI</td>
<td>50%</td>
<td>24%</td>
<td>12%</td>
</tr>
</tbody>
</table>
White households represent approximately 68% of the region’s low income households, and roughly 58% in the jurisdiction of Omaha. Overall, white households are under-served by publicly supported housing programs within the jurisdiction: Only 29% of assisted households in the jurisdiction are White, even though white households represent 58% of the jurisdiction’s low income households. This is particularly true of the public housing and HCV programs in the jurisdiction, in which White households represent only roughly 24% and 29% of households served, respectively. White households are proportionately served by the jurisdiction’s project-based Section 8 and other multi-family housing programs, but these represent a fairly small proportion of the jurisdiction’s assisted housing. However, outside the jurisdiction of Omaha, White households are proportionately served by the region’s publicly supported housing programs.

Hispanic households represent 9% of the region’s low income households, and roughly 11% of low income households who reside in the jurisdiction of Omaha. Hispanic households are under-served by the region’s publicly supported housing programs, both in the jurisdiction of Omaha and outside the jurisdiction.

Black households represent 13% of the region’s low income households, and 20% of low-income households who reside in the jurisdiction of Omaha. Black households represent a disproportionate share of extremely low income households (households with income at 0-30% of AMI): 20% of the region’s extremely low income households are Black, and 28% of the jurisdiction’s extremely low income households. The region’s publicly supported housing programs predominantly serve Black households. Fifty-two percent of the region’s assisted households are Black. Within the jurisdiction of Omaha, 65% of assisted households are Black.

**DCHA:**

Census data shows DCHA jurisdictional area to historically and currently to be predominantly white, with few minority populations. Based on map 2, all minority populations are sparse in this area. However, it can also be noted that there does not appear to be significant pockets of settlement but rather minorities are sparsely represented throughout the entire DCHA jurisdiction. Also relative to the historical lack of integration over the past 30 years, it does appear to be improving statistically by percentage, the same as other areas of Omaha even though overall rates are lower.
than much of the East side of the city. While segregation appears to be high, this is an area of opportunity with barriers in relation to housing availability and transportation needs.

According to HUD map 1 and 2, the area code 68134 is an area within DCHA jurisdiction where minorities, particularly Black, Non-Hispanic, seem to integrate in the western part of Omaha, and this is expected to continue. However, other minority populations of Hispanic, Asian or Pacific Islander, Non-Hispanic, Native American, Non-Hispanic, and Other are more sporadically integrating in the DCHA service area.

COUNCIL BLUFFS

According to data tables provided by HUD for Publicly Supported Households by Race/Ethnicity, the following are the demographics found:

For Public Housing the breakdown of Race/Ethnicity is:

- White: 96.11%
- Black: 1.77%
- Hispanic: 2.12%
- Asian or Pacific Islander: 0.00%

For Project-Based Section 8 the breakdown of Race/Ethnicity is:

- White: 86.68%
- Black: 6.31%
- Hispanic: 5.37%
- Asian or Pacific Islander: 0.70%

For Other Multifamily the breakdown of Race/Ethnicity is:

- White: 100.00%

For Housing Choice Voucher Program the breakdown of Race/Ethnicity is:

- White: 88.91%
- Black: 7.34%
Throughout the city of Council Bluffs, there are 41,510 households, out of those households 91.06% consist of White residents, 1.12% consist of Black residents, 5.82% consist of Hispanic residents and 0.48% consist of Asian or Pacific Islanders. Although there are significantly less residents that fall into protected classes, there is something that is largely noticeable about the city of Council Bluffs; over half of the population of White residents fall within the extremely low to moderate-income category. Therefore, the city of Council Bluffs has a significant difference from other areas within its region; while the city of Omaha may see a larger number of families that fall into protected classes that are in the extremely low to moderate-income category, this is not the case for the city of Council Bluffs.

**Figure V-105 Publicly Supported Housing and Race/Ethnicity**
When comparing Bellevue publicly supported housing data to the Omaha-Council Bluffs region, Project-Based Section 8 is very similar. For both the Public Housing and HCV Program, the region as a whole has more Black household participation than Bellevue. Hispanic households participate slightly more in the public housing program in the region than in Omaha.

Eligibility for housing assistance is based on income and households must earn less than 50% of the area median income to qualify although the threshold can be higher depending upon the program. When looking at the racial and ethnic make up of the households participating in publicly supported housing, the households have a very similar racial and ethnic breakdown as the general population.
According to HUD Table 6, the number of Bellevue residents living at or below 50% of the area median income are:

- White – 2,445 (15.5% of total White households)
- Black – 364 (28% of total Black households)
- Hispanic – 554 (30% of total Hispanic households)
- Asian or Pacific Islander - 65 (21% of total Asian or Pacific Islander population)

The total population of households living at or below 50% of the AMI is 3,428 while the total number of publicly supported housing programs is only 454, providing housing for only 13% of those that qualify. The chart below shows the percentage of income eligible households that are participating in publicly supported housing programs. While 30% of Hispanic households income qualify, only 5% currently participate in housing assistance programs.

Table V-65

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Public Housing</th>
<th>Project Based Section 8</th>
<th>Other Multi-Family</th>
<th>HCV Program</th>
<th>TOTAL</th>
<th>% of Income Eligible in Publicly Supported Housing (based on 50% MFI)</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>28</td>
<td>217</td>
<td>-</td>
<td>69</td>
<td>314</td>
<td>12.84%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>12</td>
<td>48</td>
<td>-</td>
<td>67</td>
<td>127</td>
<td>34.89%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>7</td>
<td>24</td>
<td>-</td>
<td>20</td>
<td>51</td>
<td>9.21%</td>
</tr>
<tr>
<td>Asian</td>
<td>2</td>
<td>4</td>
<td>-</td>
<td>11</td>
<td>17</td>
<td>26.15%</td>
</tr>
<tr>
<td>Total</td>
<td>49</td>
<td>293</td>
<td>-</td>
<td>167</td>
<td>509</td>
<td>14.84%</td>
</tr>
</tbody>
</table>

SOURCE: Decennial Census; APSH; CHAS
b. Publicly Supported Housing Location and Occupancy

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

OMAHA

OHA

HUD data indicate that R/ECAP areas exist in 9 of the region’s Census Tracts. All 9 of the R/ECAPs are located within the jurisdiction of the City of Omaha and are located in east Omaha—north and south of Omaha’s downtown.

Seven of the R/ECAPs are clustered north of Omaha’s downtown in Omaha’s historically black neighborhoods. In the past twenty years, there has been significant redevelopment in northwest Omaha, with new housing and business, which has provided opportunities to North Omaha families. The concentration of black families in Omaha has expanded west, but predominantly remains north of Dodge Street.
An eighth R/ECAP is located just south and west of downtown, in a neighborhood that historically has had a reputation as "rough" and very low-income but, currently, is surrounded by vibrant redevelopment of Omaha’s Midtown and surrounding neighborhoods. The ninth R/ECAP is isolated near the southeast border of the jurisdiction and located in south Omaha. South Omaha’s neighborhoods have become predominantly Hispanic, and traditionally have been considered Omaha's "ethnic" neighborhoods (whether Polish, Italian, Hispanic etc), in part because of their historical proximity to the stockyards.

While these 2 south R/ECAPs appear isolated, they are located in neighborhoods that are predominantly Hispanic. The concentration of Hispanic residents extends beyond Omaha’s jurisdiction to cities south and east, particularly Bellevue, and has grown north toward Omaha’s downtown.
The concentration of Black and Hispanic families corresponds with concentrations of poverty. This map shows a broad white swatch extending north to south through east Omaha, which reflects high concentration of poverty. The highest concentration of poverty encompasses the R/ECAPs, as well as their surrounding neighborhoods, which are the neighborhoods with concentration of Black and Hispanic households. In north Omaha, the concentration of poverty is expanding west.
Per HUD data, there are approximately 11,400 households in the region who reside in publicly assisted units. The majority of these households, approximately 8,300, reside within the jurisdiction of Omaha. 1,984 assisted households reside within R/ECAP areas. This represents roughly 24% of Omaha’s assisted households, and roughly 17% of the region’s assisted households.

Only a handful of Omaha’s public housing developments are located within the R/ECAP areas, but these tend to be large developments, and these developments contribute to the concentration of poverty in neighborhoods that are racially/ethnically segregated. OHA has three large public housing developments with larger bedroom-size units for families with children: Southside Terrace, Spencer Homes, and Chambers Court. All three are located within R/ECAP areas. In addition, the R/ECAP areas include two large public housing developments, Jackson Tower and Evans Tower, with efficiencies and one-bedroom apartments. These five public housing developments located within the R/ECAPs represent roughly 30% of the public housing units in the region.

While the large majority (roughly 70%) of Omaha’s public housing units are located outside of the R/ECAPs, the location of Omaha’s public housing developments tends to
correspond with the neighborhoods of minority concentration. Nearly every public housing development is located east of 72nd Street, and the vast majority are located east of 50th Street. The developments likely create or contribute to the concentration of poverty in these neighborhoods, and they track with the concentrations of poverty.

**Figure V-109 Omaha Public and Scattered Site Housing**

OHA’s scattered site public housing units are an exception. (Due to HUD’s asset management requirements, they are not represented on the HUD maps.) OHA has more than 600 units which are considered to be scattered sites, many are single family homes or duplexes. The majority were developed according to a settlement agreement that required that an equal number of scattered site public housing units be sited within each city council district. OHA’s scattered site public housing units located in north east Omaha are located in neighborhoods of high concentration of minorities and high concentrations of poverty—as are, though to a lesser degree, OHA’s scattered site public housing units sited in southeast and northwest Omaha. OHA also has 76 scattered site units located in southwest Omaha, which are sited outside of Omaha’s neighborhoods of high minority concentration and concentration of poverty.

The primary source of development of new affordable housing in the region—the project-based voucher program, other multi-family housing, and above all, Low Income
Housing Tax Credit (LIHTC) units—are predominantly concentrated in the same neighborhoods as OHA’s public housing developments. These are the neighborhoods that contain or surround the R/ECAPs, with high minority concentrations and with high concentrations of poverty. The location of LIHTC developments, represented by purple dots, tracks almost identically with concentrations of poverty in Omaha. However, as the map below demonstrates, these programs have expanded west. The project-based voucher program has expanded publicly supported housing that is sited south and southwest Omaha.

Figure V-110 Omaha Project-Based Section 8, LIHTC, and Other Multifamily Housing

Source: HUD Map 5 Publicly Supported Housing; Project-Based Section 8, LIHTC, and Other Multifamily Housing Only

The HCV program is the largest publicly supported housing program in the region and in the jurisdiction. As the HCV program assistance is not site-based, the program is intended to expand low income families’ housing choice. Less than 20% of Omaha’s voucher holders reside within R/ECAP areas. Nonetheless the majority reside in the same neighborhoods that have high concentrations of minority households and high concentrations of poverty. Voucher utilization in Omaha follows the map of poverty concentration and, particularly, the map of concentrations of Black households, as the majority of assisted families are Black.
The map above, showing voucher utilization, also shows a dozen or so tracts with higher voucher utilization located in southwest Omaha. This utilization tends to track with the development of other, site-based publicly supported housing, as shown in the map below, which includes project-based voucher developments, LIHTC developments, and other multi-family housing developments.
Figure V-112 Omaha Voucher Units, Other Multifamily, Project-Based Section 8, LIHTC

Source: HUD Map 5 Publicly Supported Housing

**DCHA**

DCHA, OHA, and BHA are the PHA’s in the service area. Jurisdiction lines were established at 72nd Street and the Sarpy county line. All areas serve very different populations and demographics. OHA is in the jurisdiction of the R/ECAP. DCHA does not have any properties in the R/ECAP area. Map 5 provides further information about the publicly supported residents in the non-R/ECAP areas. Many of DCHA developments and projects are more rurally focused in the surrounding areas that are still within the service area.
DCHA properties include the following identifications:

<table>
<thead>
<tr>
<th>PROJECT</th>
<th>LOCATION</th>
<th>PROJECT TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benn View I</td>
<td>15652 N. 4&lt;sup&gt;th&lt;/sup&gt; Bennington</td>
<td>Section 8 New Construction</td>
</tr>
<tr>
<td>16 Apartment Units</td>
<td>Units 1-8</td>
<td>Built 1981</td>
</tr>
<tr>
<td>Property Code: bv1</td>
<td>Units 9-16</td>
<td></td>
</tr>
<tr>
<td>Program Type: HUD New Const./ HAP</td>
<td>Built 1981</td>
<td></td>
</tr>
<tr>
<td>Handicap units #1,2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Benn View II</td>
<td>15652 N. 4&lt;sup&gt;th&lt;/sup&gt; Bennington</td>
<td>Owner is DCHA Section 8 project-based Vouchers</td>
</tr>
<tr>
<td>8 Apartment Units</td>
<td>Units 17-24</td>
<td>used to subsidize the rent</td>
</tr>
<tr>
<td>Property Code: bv2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Type: Rural Elderly</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handicap = 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Acres</td>
<td>54 __ N. 108&lt;sup&gt;th&lt;/sup&gt; St. Omaha 68164</td>
<td>Low Rent</td>
</tr>
<tr>
<td>40 Apartment Units</td>
<td></td>
<td>Built 1983</td>
</tr>
<tr>
<td>Property Code: na</td>
<td></td>
<td>Flat Rent = $635</td>
</tr>
<tr>
<td>Program Type: HUD Low Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handicap Units # 7, 9, 43 &amp; 45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single Family Homes</td>
<td>Various locations (see property revised document)</td>
<td>Low Rent</td>
</tr>
<tr>
<td>38 Houses</td>
<td></td>
<td>Built between 1978 and 1995</td>
</tr>
<tr>
<td>Property Code: sf</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Type: HUD Low Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handicap Unit: 15329 (Monroe)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Valley Heights</td>
<td>309-317 W. Meigs – Valley</td>
<td>Owner is DCHA Section 8 project-based Vouchers</td>
</tr>
<tr>
<td>16 Units</td>
<td></td>
<td>used to subsidize the rent</td>
</tr>
<tr>
<td>Property Code: vh</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Type: Rural Elderly</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handicap Unit #1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td>Units</td>
<td>Property Code</td>
</tr>
<tr>
<td>---------------------------</td>
<td>-------</td>
<td>---------------</td>
</tr>
<tr>
<td>Valley View</td>
<td>28</td>
<td>vv</td>
</tr>
<tr>
<td>Woodgate</td>
<td>20</td>
<td>wg</td>
</tr>
<tr>
<td>Valley CROWN</td>
<td>12</td>
<td>vc</td>
</tr>
<tr>
<td>Gretna CROWN</td>
<td>15</td>
<td>gc</td>
</tr>
<tr>
<td>Platte Valley Apartments</td>
<td>48</td>
<td>pv</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*REAC Property ID: 800013572
COUNCIL BLUFFS

Publicly Supported Housing is spread throughout the city of Council Bluffs. There are many different properties located throughout the city that provide subsidized housing, along with voucher holders through the HCV program that live in a variety of different areas throughout the city of Council Bluffs. The city of Council Bluffs does not see any segregated areas or R/ECAPs.

BELLEVUE

HUD Map 5 displays publicly supported housing in Bellevue including public housing, project based section 8, low income housing tax credit Overall, publicly supported developments are throughout Bellevue. There are several Low Income Housing Tax Credit and Project-Based Section 8 locations with one Other Multifamily project. Housing Choice Voucher units are limited throughout the community with no more than 11.35% voucher units in any census tract.

There are no R/ECAPs in Bellevue as defined by HUD’s AFFH tool.
Figure V-113 Publicly Supported Housing Bellevue

Source: HUD Map 5 Publicly Supported Housing and Race/Ethnicity
ii. **Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?**

**OMAHA**

**OHA**

Only a handful of Omaha’s public housing developments are located within the R/ECAP areas, but these tend to be large developments, and these developments contribute to the concentration of poverty in neighborhoods that are racially/ethnically segregated. These public housing developments located within the R/ECAPs represent roughly 30% of the public housing units in the region.

OHA has three large public housing developments with larger bedroom-size units for families with children: Southside Terrace, Spencer Homes, and Chambers Court. All three are located within R/ECAP areas.

In addition, the R/ECAP areas include two large public housing developments, Jackson Tower and Evans Tower. These two developments are primarily comprised of efficiency and one-bedroom apartments. Evans Tower is designated for elderly residents. Jackson Tower is open to any income-eligible household of appropriate size for its small apartments.

OHA has 4 developments designated for elderly residents. Evans Tower is located in a R/ECAP area in north Omaha. The other three elderly developments—Kay Jay, Underwood Tower, and Crown Tower—are located outside but near R/ECAP areas, in east Omaha neighborhoods with high concentrations of minorities and higher
concentrations of poverty.

The majority of OHA’s other public housing developments are located outside of R/ECAP neighborhoods, but like the majority of OHA’s public housing units, they tend to be located in east Omaha, generally east of 72nd Street, in neighborhoods of minority concentration and higher concentrations of poverty.

OHA’s public housing stock also includes more than 600 units which are considered to be scattered sites, many are single family homes or duplexes. With a few exceptions, these units are larger bedroom size and serve families with children. The majority were developed according to a settlement agreement that required that an equal number of scattered site public housing units be sited within each city council district. OHA’s scattered site public housing units located in north east Omaha are located in neighborhoods of high concentration of minorities and high concentrations of poverty—as are, though to a lesser degree, OHA’s scattered site public housing units sited in southeast and northwest Omaha. OHA also has 76 scattered site units located in southwest Omaha, which are sited outside of Omaha’s neighborhoods of high minority concentration and concentration of poverty. OHA also has roughly 45 units of public housing in the Timbercreek Apartments development, which is located in the southwest.

DCHA

DCHA properties offer preference points at many developments for disability and employment. There is a higher demographic of persons with disability in the developments. DCHA also offers a range of houses that provide subsidized housing to larger family structures that with family member that is disabled or employed 25 hours/week or more.

COUNCIL BLUFFS

Publicly Supported Housing is spread throughout the city of Council Bluffs. There are many different properties located throughout the city that provide subsidized housing, along with voucher holders through the HCV program that live in a variety of different areas throughout the city of Council Bluffs. The city of Council Bluffs does not see any segregated areas or R/ECAPs.
BELLEVUE

Bellevue does not contain a R/ECAPS area. The publicly support housing is spread out throughout our community. There is one project-based section 8 location for specifically for elderly located in Western Bellevue in the Olde Towne Bellevue area and another low income housing tax credit property specifically for persons with disabilities in west central Bellevue. The remaining units available to families with children are scattered throughout Bellevue.

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

OMAHA

OHA

Table V-66 Omaha Comparison of Demographics in R/ECAP Census Tracts and Non-R/ECAP Census Tracts

<table>
<thead>
<tr>
<th></th>
<th>WHITE</th>
<th>BLACK</th>
<th>HISPANIC</th>
<th>ASIAN/PI</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>PUBLIC HOUSING</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R/ECAPs</td>
<td>18%</td>
<td>72%</td>
<td>8%</td>
<td>0.12%</td>
<td>815</td>
</tr>
<tr>
<td>NON-R/ECAPs IN JURISDICTION</td>
<td>27%</td>
<td>66%</td>
<td>5%</td>
<td>0.49%</td>
<td>1857</td>
</tr>
<tr>
<td>JURISDICTION TOTAL</td>
<td>24%</td>
<td>68%</td>
<td>6%</td>
<td>0.38%</td>
<td>2,626</td>
</tr>
<tr>
<td>OUTSIDE JURISDICTION (NON-R/ECAPs)</td>
<td>92%</td>
<td>5%</td>
<td>2%</td>
<td>0.31%</td>
<td>325</td>
</tr>
<tr>
<td>REGION TOTAL</td>
<td>31%</td>
<td>61%</td>
<td>6%</td>
<td>0.37%</td>
<td>2,951</td>
</tr>
<tr>
<td>PROJECT-BASED SECTION 8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R/ECAPs</td>
<td>57%</td>
<td>35%</td>
<td>6%</td>
<td>0.27%</td>
<td>363</td>
</tr>
<tr>
<td>NON-R/ECAPs IN JURISDICTION</td>
<td>68%</td>
<td>22%</td>
<td>9%</td>
<td>0.35%</td>
<td>566</td>
</tr>
<tr>
<td>JURISDICTION TOTAL</td>
<td>64%</td>
<td>27%</td>
<td>8%</td>
<td>0.32%</td>
<td>938</td>
</tr>
</tbody>
</table>
Roughly 30% of the jurisdiction’s public housing assisted households reside within R/ECAP areas. The public housing program predominantly serves Black households, in the R/ECAP areas and outside of R/ECAP areas, both in the jurisdiction and in the region as a whole. However the regional demographics largely reflect the jurisdiction’s demographics, as nearly 90% of the region’s public housing households reside within the jurisdiction. The percentage of Black households is higher in R/ECAPs than outside of the R/ECAPs. The percentage of White households is significantly higher (50% higher) outside of the R/ECAPs within the jurisdiction. Outside of the jurisdiction of Omaha, the region’s public housing units predominantly serve White households. There are only roughly 300 public housing units located outside the jurisdiction, and 92% of the households assisted are White. Hispanic households who receive public housing assistance are more likely to reside in a R/ECAP area. This is primarily due to
the large concentration of Hispanic households in OHA’s Southside Terrace development, a large family development located in southeast Omaha, in a R/ECAP neighborhood.

Roughly 1,700 households in the region are assisted with project-based Section 8 programs. The Project Based Voucher (PBV) program has different demographics than other publicly supported housing programs in the jurisdiction and in the region, namely the PBV program serves a larger percentage of White households. White households represent 64% of all PBV-assisted households in the jurisdiction, and 71% of all PBV-assisted households in the region. Roughly 22% of the region’s PBV households reside in R/ECAP areas. These households include a higher percentage of Black families (35% in R/ECAPs, compared to 22% of households who reside in non-R/ECAP areas within the jurisdiction, and 10% of households who reside in non-R/ECAP areas outside of the jurisdiction). Roughly 44% of the region’s PBV-assisted households reside outside of the jurisdiction, and 81% of these households are White.

The region is home to roughly 250 households who are assisted by other multi-family programs. Only 15% of these households reside in R/ECAP areas, and the majority of these households (65%) are Black households. Roughly 85% of other multi-family program units are located outside of the R/ECAP neighborhoods. These programs predominantly serve White households. White households represent 81% of assisted households who reside in the jurisdiction and in neighborhoods outside of the R/ECAP areas. White households represent 92% of households who reside in other multi-family programs located outside of the jurisdiction.

The HCV program, like the public housing program, predominantly serves Black households. Within the jurisdiction, roughly 17% of HCV-assisted households reside in R/ECAP areas. The percentage of Black households served in R/ECAP areas is significantly higher than HCV assisted households who reside outside of R/ECAP areas (89% compared to 69%). There is a significantly higher percentage of White households (27%) among PBV households who reside outside the R/ECAP areas. Only 8% of assisted households in R/ECAP areas are White households. The demographic makeup of HCV-assisted households who reside outside the jurisdiction of Omaha are very different: 76% of the approximately 1,900 households are White households.

DCHA

DCHA does not serve the R/ECAP area. On average our households show a higher income, more employed demographic.
COUNCIL BLUFFS

Council Bluffs does not contain any R/ECAPS as defined by HUD’s AFFH tool.

BELLEVUE

Bellevue does not contain any R/ECAPS as defined by HUD’s AFFH tool.

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

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

OMAHA

OHA

Hispanic households are under-served by OHA’s public housing programs and other publicly supported housing in the jurisdiction. However developments located in south and southwest Omaha, tend to have higher percentages of Hispanic residents. This includes Southside Terrace, a large development (359 units) with larger-bedroom size apartments for families with children. It also includes two small “scattered site” family developments, Crown II and Crown II, which are located just south of Southside Terrace. A pair of public housing Towers that are located in southeast Omaha—Kay
Jay Tower and Highland Tower—also have higher percentage of Hispanic households (18% and 11%, respectively). Even in scattered site public housing, Hispanic families are more likely to reside in units located in the southeast and southwest. This includes Timber Creek (16% Hispanic), Scattered Sites Southwest (13%) and Scattered Sites Southeast (8%).

OHA’s public housing developments located in north Omaha, particularly northeast Omaha—in Omaha’s historically Black neighborhoods—have notably higher percentages of Black households. Spencer Homes is a large development (112 units) with larger bedroom sizes to serve families with children. Located in one of Omaha’s north R/ECAP areas, Spencer Homes’ households are 80% Black. Chambers Court, with 70 family units located in the same neighborhood, has 90% Black households. Scattered site units in the north also predominantly serve Black families.

OHA’s towers, primarily composed of small bedroom size units, tend to have a more mixed demographic composition. For example, Pine Tower has 35% White households, 59% Black households, and 4% Hispanic households. However, public housing towers located in north Omaha, have much higher percentages of Black households. For example, Florence Tower, which has 88% Black households, 9% White households, and 2% Hispanic households.

The HCV program follows the same pattern as OHA’s public housing program. Of the roughly 4,600 households in the jurisdiction who are assisted through the HCV program, 73% are black households. The largest concentrations of vouchers are located in northeast and northwest Omaha.

**DCHA**

DCHA properties offer preference points at many developments for disability and employment. Therefore there is a higher demographic of persons with disability in the developments. DCHA also offers a range of houses that provide subsidized housing to larger family structures with a family member that is disabled or employed 25 hours/week or more.

Project-based Section 8 and other Multifamily housing appears to be further away from the R/ECAP area, more than standard public housing and LIHTC developments.
COUNCIL BLUFFS

Council Bluffs has eight Project-Based Section 8 complexes that are primarily occupied by White, Non-Hispanic households. The exception is the Plains View Apartments which has a Hispanic occupancy of 43%.

Table V-67 Public Housing, Project-Based Section 8, and Other Multifamily Assisted Housing
### Public Housing

#### Council Bluffs Jurisdiction

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regal Towers</td>
<td>IA013</td>
<td>MHA</td>
<td>209</td>
<td>59%</td>
<td>2%</td>
<td>3%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Dudley Court</td>
<td>IA013</td>
<td>MHA</td>
<td>85</td>
<td>59%</td>
<td>2%</td>
<td>1%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
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</table>

#### Project-Based Section 8

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodbury Prime Apts.</td>
<td>N/a</td>
<td>N/a</td>
<td>100</td>
<td>69%</td>
<td>2%</td>
<td>1%</td>
<td>N/a</td>
<td>62%</td>
</tr>
<tr>
<td>Featherstone Apartments</td>
<td>N/a</td>
<td>N/a</td>
<td>102</td>
<td>69%</td>
<td>21%</td>
<td>7%</td>
<td>N/a</td>
<td>80%</td>
</tr>
<tr>
<td>Bluffs Homes, Inc.</td>
<td>N/a</td>
<td>N/a</td>
<td>70</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Camelot Village</td>
<td>N/a</td>
<td>N/a</td>
<td>35</td>
<td>100%</td>
<td>N/a</td>
<td>0%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Maple Park Apts.</td>
<td>N/a</td>
<td>N/a</td>
<td>51</td>
<td>54%</td>
<td>4%</td>
<td>0%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>North Avenue Tower Apts.</td>
<td>N/a</td>
<td>N/a</td>
<td>92</td>
<td>59%</td>
<td>1%</td>
<td>0%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Northgate Apts.</td>
<td>N/a</td>
<td>N/a</td>
<td>45</td>
<td>82%</td>
<td>7%</td>
<td>2%</td>
<td>9%</td>
<td>68%</td>
</tr>
<tr>
<td>Plains View Apartments</td>
<td>N/a</td>
<td>N/a</td>
<td>30</td>
<td>54%</td>
<td>4%</td>
<td>43%</td>
<td>N/a</td>
<td>N/a</td>
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#### Other Multifamily Assisted Housing

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kanesville Heights</td>
<td>N/a</td>
<td>N/a</td>
<td>37</td>
<td>100%</td>
<td>N/a</td>
<td>0%</td>
<td>N/a</td>
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<tr>
<td>Mosaic Housing Corp Xv</td>
<td>N/a</td>
<td>N/a</td>
<td>12</td>
<td>100%</td>
<td>N/a</td>
<td>0%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
</tbody>
</table>

Note 1: For LIHTC properties, this information will be supplied by local knowledge.
Note 2: Percentages may not add to 100 due to rounding error.
Note 3: Data Source: APSH

Source: APSH

### BELLEVUE

For Project-Based Section 8 units, the demographic composition for Bellewood Courts, Mission House Vue, and Bellevue Place developments are similar to the demographic make-up of the city as a whole. Southgate Apartments demographic make-up is significantly different than other developments with a higher population of Black households and possibly families with children.
Table V-68

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellevue Housing Authority</td>
<td>NE174</td>
<td>Bellevue</td>
<td>49</td>
<td>57%</td>
<td>24%</td>
<td>14%</td>
<td>4%</td>
<td>94%</td>
</tr>
</tbody>
</table>

**Bellevue, NE Jurisdiction**

**Project-Based Section 8**

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mission House Vilas</td>
<td>N/a</td>
<td>N/a</td>
<td>42</td>
<td>97%</td>
<td>1%</td>
<td>2%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Bellevue Place</td>
<td>N/a</td>
<td>N/a</td>
<td>42</td>
<td>90%</td>
<td>5%</td>
<td>2%</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>Southgate Apts</td>
<td>N/a</td>
<td>N/a</td>
<td>145</td>
<td>47%</td>
<td>33%</td>
<td>16%</td>
<td>1%</td>
<td>78%</td>
</tr>
</tbody>
</table>

**Other HUD Multifamily Assisted Housing**

<table>
<thead>
<tr>
<th>Development Name</th>
<th>PHA Code</th>
<th>PHA Name</th>
<th># Units</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Households with Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheltering Tree Housing</td>
<td>N/a</td>
<td>N/a</td>
<td>11</td>
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<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
<td>N/a</td>
</tr>
</tbody>
</table>

*Note 1: For LIHTC properties, this information will be supplied by local knowledge.*
*Note 2: Percentages may not add to 100 due to rounding error.*
*Note 3: Data Sources: APSH*

Source: HUD Table 8

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.
OMAHA

OHA

Hispanic households are under-served by OHA’s public housing programs and other publicly supported housing in the jurisdiction. However developments located in south and southwest Omaha tend to have higher percentages of Hispanic residents. This includes Southside Terrace, a large development (359 units) with larger-bedroom size apartments for families with children. It also includes two small “scattered site” family developments, Crown II and Crown II, which are located just south of Southside Terrace. A pair of public housing Towers that are located in southeast Omaha—Kay Jay Tower and Highland Tower—also have higher percentage of Hispanic households (18% and 11%, respectively). Even in scattered site public housing, Hispanic families are more likely to reside in units located in the southeast and southwest. This includes Timber Creek (16% Hispanic), Scattered Sites Southwest (13%) and Scattered Sites Southeast (8%).

OHA’s public housing developments located in north Omaha, particularly northeast Omaha—in Omaha’s historically Black neighborhoods—have notably higher percentages of Black households. Spencer Homes is a large development (112 units) with larger bedroom sizes to serve families with children. Located in one of Omaha’s north R/ECAP areas, Spencer Homes’ households are 80% Black. Chambers Court, with 70 family units located in the same neighborhood, has 90% Black households. Scattered site units in the north also predominantly serve Black families.

OHA’s towers, primarily composed of small bedroom size units, tend to have a more mixed demographic composition. For example, Pine Tower has 35% White households, 59% Black households, and 4% Hispanic households. However, public housing towers located in north Omaha, have much higher percentages of Black households. For example, Florence Tower, which has 88% Black households, 9% White households, and 2% Hispanic households.

The HCV program follows the same pattern as OHA’s public housing program. Of the roughly 4,600 households in the jurisdiction who are assisted through the HCV program, 73% are black households. The largest concentrations of vouchers are located in northeast and northwest Omaha.

DCHA
Since many of DCHA properties are located outside of the service area and in smaller communities, there is a correlation to the amount of racial and ethnic diversity. These communities are generally smaller, established towns primarily white. This is a trend that we feel is gradually changing over the years. We are directing out marketing toward a more diverse population. Schools and communities in those areas are making adaptations to the changing cultures.

COUNCIL BLUFFS

Throughout the city of Council Bluffs, there are 41,510 households, out of those households 91.06% consist of White residents, 1.12% consist of Black residents, 5.82% consist of Hispanic residents and 0.48% consist of Asian or Pacific Islanders. Although there are significantly less residents that fall into protected classes, there is something that is largely noticeable about the city of Council Bluffs; over half of the population of White residents fall within the extremely low to moderate-income category. Therefore, the city of Council Bluffs has a significant difference from other areas within its region; while the city of Omaha may see a larger number of families that fall into protected classes that fall into the extremely low to moderate-income category, which is not the case for the city of Council Bluffs.

The Municipal Housing Agency’s Public Housing properties are Dudley Court and Regal Towers. The MHA’s Public Housing properties mainly house elderly, disabled and near-elderly residents. The Municipal Housing Agency’s first preference for the waiting list is elderly and disabled individuals that currently reside in the city limits of Council Bluffs.

The Municipal Housing Agency manages no additional public housing units except for Dudley Court and Regal Towers. The Municipal Housing Agency does administer 677 housing choice vouchers and in addition, Municipal Housing Agency’s Housing Choice Voucher program has 20 VASH vouchers that are designated for homeless veteran applicants. The Municipal Housing Agency has strong ties with many different agencies throughout the community that provide support to those that are disabled and in need of assistance.

BELLEVUE

Southgate Apartments is located in a census tract that is demographically different than the community as a whole. This area is made up of 39% White households, 25% Black households and 25% Hispanic households. Bellevue Place Apartments is specifically for elderly households. The multifamily assisted housing project, Sheltering Tree Housing,
is specifically for adults with developmental disabilities to provide individual apartments with a live-in manager caregiver.

c. Disparities in Access to Opportunity

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

OMAHA

OHA

Publicly supported housing is heavily concentrated in the eastern portion of the City of Omaha. This is also the area that has lower performing schools.

Many of the large employers in the City of Omaha are located centrally in either the downtown area, Midtown or along the Dodge Street corridor. There are far fewer employment opportunities in northeast Omaha when compared with the rest of the jurisdiction. The northeast section of Omaha also has the largest concentration of publicly supported housing.

Public transit access is generally poor throughout the jurisdiction but is slightly better in east Omaha when compared with west Omaha.

Because of the concentration of publicly supported housing in the eastern portion of the City, the protected classes have limited access to low poverty neighborhoods, which are concentrated in the western portion of the City.

The environmentally impacted neighborhoods in the jurisdiction are primarily located in the eastern part of the City. These neighborhoods were impacted by the lead smelting plant that was located along the Missouri River. The heavily impacted areas are located specifically in the northeast portion of the City.

DCHA

The access to opportunity is primarily caused by lack of transportation options to many residents of publicly supported housing at various levels. There are a limited number of
employment, housing, and educational opportunities throughout the area, opportunities to utilize these are dependent on the abilities of the person to get to them, something that having a family, disability or lower income can limit. Very few publicly supported housing options are in areas with greater access to opportunity and those that are often have long waiting lists. There are no public transportation areas near many of the larger employment hubs. Also, the level of skill and entry level positions may not be available at these locations.

COUNCIL BLUFFS

While the city of Council Bluffs has many different options for low-income or subsidized housing, there are still many individuals that are living in subpar housing that is not adequate. There are many participants in the HCV program that have different barriers when they attempt to find suitable housing, either the landlord will not accept a Voucher, the rent and utilities do not meet the payment standards, or the unit does not pass HQS standards. The Municipal Housing Agency is the only agency in Council Bluffs that has Public Housing. There is a need for larger units that are subsidized, as the Municipal Housing Agency only has units that are efficiencies and one-bedroom.

BELLEVUE

HUD Map 5 shows that there are publicly supported housing developments throughout Bellevue. While the location of project-based Section 8 Housing, LIHTC and Public Housing units are spread out through the community, HCV participants have limited choice within Bellevue when compared to the region as a whole.

2. Additional Information

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

OMAHA

OHA
The Omaha Housing Authority, as part of the settlement of a lawsuit, was required to acquire 521 scattered site units that are evenly distributed among the Omaha City Council districts. With the exception of these units, Omaha Housing Authority units are located in east Omaha, generally east of 50th Street.

**DCHA**

The general public often is more in support of senior housing options. There is a wider selection of LIHTC options for elderly designation throughout all areas. Communities and areas seem more concerned and oppositional to housing primarily serving families with children in many areas.

**COUNCIL BLUFFS**

Through feedback the City of Council Bluffs and the Municipal Housing Agency heard concerns that there is a lack of housing stock in affordable units in a variety of sizes, as well as that there is not enough affordable accessible housing in Council Bluffs. It was expressed by participants of the Housing Choice Voucher program that there is a definite issue with impediments to mobility. One Voucher holder expressed that she would like to move due to her son’s need to be in a certain school district, due to his disability, but could not find a landlord that would take her voucher or a home that fell within the payment standard guidelines.

**BELLEVUE**

Table V-69  Bellevue Housing Authority Waiting List Demographics
b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

OMAHA

OHA

OHA’s public housing stock represents a significant share (roughly 3,000 units) of the region’s publicly supported housing. With the exception of scattered site units, the majority of OHA’s public housing developments are located in east Omaha, in the jurisdiction’s neighborhoods identified as R/ECAPs or having high concentrations of minority households and high concentrations of poverty. Obviously, these site-based units cannot be relocated. Instead, OHA’s intent is to seek to strengthen neighborhoods in which its public housing stock is located. This may include redevelopment or renovations of OHA’s large multifamily housing developments. It also includes cooperation with community stakeholders for improvements and redevelopment in the neighborhoods surrounding OHA’s public housing. From this perspective, the location of new affordable housing within R/ECAPs and areas of concentrated poverty may have significant benefits, for purposes of redeveloping blighted properties and increasing public and private investment in neighborhoods.

In the 1990s-2000s, OHA entered into a settlement agreement to develop 521 scattered site units located throughout the city of Omaha. Private discrimination was a significant barrier to these acquisitions, particularly in neighborhoods with limited affordable housing and lower concentrations of poverty.

Poverty is a significant barrier to many families’ housing choice and access to
opportunity. OHA operates Family Self-Sufficiency programs serving both its public housing and Section 8 program participants. While the service resources are not sufficient to address the need in our community, these programs make a significant impact on the lives of the families assisted.

The demographics of OHA’s public housing developments tend to reflect the demographics of their surrounding neighborhoods. There is a large concentration of Hispanic families in south Omaha. OHA’s public housing developments likewise contain a large number of Hispanic families. In north Omaha, Omaha’s historically Black neighborhoods, OHA’s public housing developments have high concentrations of Black families. OHA maintains site-based waiting lists, so that families can choose their priorities developments for admission. To a large extend, the households served request to live in the same neighborhoods with high minority concentrations. There are a number of very practical reasons for this— their family may live nearby, their child care providers, their support networks, the restaurants and churches and cultural resources they prefer. In many cases when OHA offers to transfer a family, Hispanic families may refuse to move outside of south Omaha, and likewise Black families may refuse to move outside of north Omaha. OHA’s commitment is to support family choice, and to expand access to opportunity for all families served.

DCHA

DCHA has had much success with a limited number of self-sufficiency tenants, and resident services offered to elderly and disabled complexes. It appears that often tenant’s may be in a generational cycle of poverty and subsidized housing. The opportunity to have additional guidance and support in this environment has proven in the programs to have success.

Overall, there is an ongoing need for additional need for more publicly supported housing in DCHA jurisdictional area. HUD map 17 clearly shows a significant lack of affordable units in the western area of DCHA jurisdiction.

Figure V-114 Publicly Supported Housing Omaha
There are some pockets of more affordable options noted but in the vast majority of the area, this is not the case. One of the biggest barriers is income discrimination. Despite there being a vast amount of apartment complexes and rental units in the area, often there is much resistance and willingness to accept HCV. Some of this also comes from community opposition as well. Historically there has been public resistance in some areas when housing plans are released to the general public. Often it is reported, property owners experience NIMBYism. This significantly impacts the willingness of developers to build outside the core neighborhoods. Occupancy codes are an issue in the service area. Since the FMR is at a higher level, families often cannot afford or locate the appropriate size unit for their family size. Fair Market rents have increased significantly in up and coming areas of the city. This has caused an increased demand of rental housing in various areas of the jurisdiction. In addition, the HCV programs continue to face additional budgetary reductions.
The Municipal Housing Agency has received grant money from the Council Bluffs Housing Trust Fund to complete various renovations to the Regal Towers and Dudley Court properties. These grant monies were used to renovate existing units and make them more accessible, through walk-in and roll-in shower renovations, providing high-rise toilets in units, and other accessible accommodations as well. The Municipal Housing Agency will continue to apply for grant monies from the Council Bluffs Housing Trust Fund to renovate units to make them more accessible, to combat the issue that the region faces with a lack of accessible units in a range of sizes. The Family Self-Sufficiency Program strives to obtain new participants, so they may one day maintain self-sufficiency without the help of the Housing Choice Voucher program. Within the past 12 months, Municipal Housing Agency’s Family Self Sufficiency Program has had four out of six participants graduate. Amongst these participants, they received $55,088.31 in escrow funds. One of those graduates went into homeownership and used the money from her escrow account as a large down payment on her home. Another graduate successfully left the Housing Choice Voucher Program because her household income exceeded the income guidelines after obtaining employment from a local competitive employer.

BELLEVUE

Bellevue Housing Authority (BHA) has had a great deal of success with a limited number of residents through participation in a family self-sufficiency program. The program provides personalized goals and case coordination for community resources and education programs.

BHA offers Rentwise curriculum to the Omaha metropolitan area residents.

BHA does annual and ongoing outreach to private landlords. A great deal of this outreach is framed around fair housing education.

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

**OMAHA**

*Lack of community revitalization strategies:*
Community revitalization strategies are focused on certain areas of the jurisdiction. Omaha’s redevelopment has proven to be very successful in revitalizing older neighborhoods with high concentrations of poverty—for example, Omaha’s redevelopment of Midtown and surrounding neighborhoods—however there are insufficient resources to meet the needs within the community.

*Lack of private investment in specific neighborhoods:*
Companies and developers are reluctant to invest in certain impacted areas of the jurisdiction due to the prevalence of crime, urban blight, and perceptions that the schools are lower quality. Developing green fields is less expensive than redeveloping and infilling in older neighborhoods. Public housing stock tends to be located in older Omaha neighborhoods with high concentrations of poverty.

*Deteriorated and abandoned properties:*
Deteriorated and abandoned properties in the older neighborhoods further discourage investment.

*Source of Income discrimination:*
Nebraska law does not prohibit landlords from refusing to lease to families with Housing Choice vouchers. Some states include “source of income” among the protected classes, and prohibit discrimination against vouchers. However, often landlords can get around legal prohibitions by increasing rents beyond the payment standard. The effect is to further limit the supply of affordable housing.

*Lack of access to opportunity due to high housing costs:*
Housing choice voucher families tend to concentrate in Omaha’s neighborhoods with existing concentrations of minorities and concentrations of poverty. Many families prefer to live in Omaha’s older neighborhoods. However, there are significant barriers for families who chose (or would consider) to relocate to areas with lower concentration of poverty, namely west and southwest Omaha and surrounding communities.
**Impediments to mobility:**
There is limited availability of publicly supported housing in southwest Omaha, west of 72nd Street. Rental units in the southwest and west tend to be more expensive than units in the east. South and west Omaha are areas of job growth. Low income families residing in east Omaha, particularly northeast Omaha, have significant commutes to work. Families who rely on buses for transportation may face commutes of an hour or more.

**Lack of affordable in-home or community based services for persons with disabilities:**
OHA’s public housing program serves a large number of persons with behavioral health disabilities. There is a need for increased supportive services to help persons with behavioral health disabilities to maintain lease compliance and maintain their housing. OHA continues to build partnerships with community resources to assist our residents. However, funding restrictions—both for OHA and for community service providers—result in unmet needs.

**Access to publicly supported housing for persons with disabilities and lack of affordable accessible housing in a range of sizes:**
OHA likely has the largest supply of affordable accessible housing in the region. However, the demand is greater than supply, particularly for large bedroom sizes.

**Quality of affordable housing information programs and lack of meaningful language access:**
The analysis of publicly supported housing programs indicates that Hispanic households are under-served. OHA has Spanish speaking staff and has not found that language is a barrier for Hispanic families’ access to our housing programs.

**COUNCIL BLUFFS**

Disproportionate Housing Needs
1. Impediments to mobility
2. Lack of local or regional cooperation

**BELLEVUE**

*Quality of affordable housing information programs:*
While there are housing assistance opportunities in the community, the issues appear to be coordination of efforts so that the information is readily available and residents are aware of options available. This limits fair housing choice and access to opportunities due to lack of knowledge of the programs available.

**Community Opposition:**
Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to voucher holders. Despite education and outreach from the Housing Authority staff, this has continued with several large management companies in the jurisdiction.

**Lack of meaningful language access for individuals with Limited English Proficiency:**
The City of Bellevue currently has a Limited English Proficiency plan, but is unaware of other plans and additional resources available. All organizations, including the City and Bellevue Housing Authority, with plans could work together to ensure all gaps are being addressed and sharing resources for a positive outcome.

**Land Use and Zoning Laws:**
The City of Bellevue Planning Commission reviews all zoning ordinances and land development proposals for consistency with the city comprehensive plan and has the opportunity to make recommendations to the City Council regarding requested changes to these ordinances. This can create situations in which municipalities have institutional barriers to affordable housing, such as minimum lot sizes and setbacks, that limit density. With available land becoming limited and Bellevue becoming landlocked by surrounding communities and natural barriers, future development of affordable housing will become more challenging with the political environment supporting more economic development.

**Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of QAPs and other programs:**
Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 454 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. The property tax structure in Sarpy County increases cost for affordable housing development. QAPs from NIFA have not taken this into consideration when awarding credits.

**Availability of affordable units in a range of sizes:**
Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 509 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. The placement of larger families is difficult due to limited available units with four bedrooms or more.

Source of Income discrimination:
Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to Voucher Holders. Despite education and outreach from the Housing Authority staff, this continues with several large management companies in the jurisdiction. BHA’s Administrative and Occupancy Plans provide preferences to disabled and elderly households.

Introduction

Regional Versus Jurisdiction Analysis
The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha
Council Bluffs
Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA
Douglas County Housing Authority- DCHA
Council Bluffs Municipal Housing Agency- MHA
Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair
housing analysis. All tables and data can be accessed online at: 
https://egis.hud.gov/affht/.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:
Demographics 2010
1 Dot = 75
- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

National Origin [Jurisdiction]
(Top 5 most populous)
1 Dot = 25 People
- Mexico
- India
- El Salvador
- Guatemala
- Thailand
### Legend

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Region</th>
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<tr>
<td>Disability</td>
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<td>TRACT</td>
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<tr>
<td>R/ECAP</td>
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</table>

#### Disability

- Hearing Disability
- Vision Disability
- Cognitive Disability

#### Jurisdiction

- Ambulatory Disability
- Self-Care Disability
- Independent Living Disability
OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- **Northwest Omaha** - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- **Southwest Omaha** - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- **Midtown** - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- **North (Northeastern Omaha)** - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- **North 24th Street Corridor** Alliance Boundaries: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- **South (Southeastern Omaha)** - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

61. Downtown: from Kimball Avenue along Kanesville/West Broadway to South 8th Street and from Kanesville/West Broadway south to 6th Avenue
62. Mid-City: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
63. Bluff-Willow: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
64. Kanesville-Tinley: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
65. North End: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
66. West End: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River
67. South End: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
68. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
69. Lake Manawa: subdivisions east of Lake Manawa
70. East End: newer area to the east of Bluff-Willow and the North End to the city limits

BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area’s largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

D. Disability and Access Analysis
1. Population Profile

**Figure V-70 Disability by Type: Comparison of Region versus Jurisdictions**

<table>
<thead>
<tr>
<th>Disability type</th>
<th>Region</th>
<th>Omaha</th>
<th>Council Bluffs</th>
<th>Bellevue</th>
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</thead>
<tbody>
<tr>
<td>Hearing Difficulty</td>
<td>3.44%</td>
<td>3.28%</td>
<td>4.82%</td>
<td>3.24%</td>
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<tr>
<td>Vision Difficulty</td>
<td>1.83%</td>
<td>2.16%</td>
<td>2.46%</td>
<td>1.56%</td>
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<tr>
<td>Cognitive Difficulty</td>
<td>4.06%</td>
<td>4.72%</td>
<td>5.84%</td>
<td>3.51%</td>
</tr>
<tr>
<td>Ambulatory Difficulty</td>
<td>5.37%</td>
<td>5.87%</td>
<td>7.87%</td>
<td>5.35%</td>
</tr>
<tr>
<td>Self-care Difficulty</td>
<td>1.88%</td>
<td>2.14%</td>
<td>2.28%</td>
<td>1.77%</td>
</tr>
<tr>
<td>Independent Living Difficulty</td>
<td>3.50%</td>
<td>3.99%</td>
<td>5.02%</td>
<td>3.07%</td>
</tr>
</tbody>
</table>

Source: HUD Table 13 Disability by Type

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

**OMAHA**

Persons with disabilities in all categories are not more highly concentrated in R/ECAP areas than in non-R/ECAP areas. However, persons with disabilities are more densely populated in areas east of 72nd street rather than the more affluent neighborhoods west of 72nd street in the Omaha metropolitan area.
Source: HUD Map 14 Disability by Type

Figure V-116 Dispersion of Hearing, Vision, and Cognitive Disability Living in Omaha

Source: HUD Map 14 Disability by Type
According to Table V-71, the number one disability in Council Bluffs is ambulatory difficulty (7.87%). This is also the number one disability for the region with 5.37% of the population struggling with mobility.

**Figure V-71 Disability by Type Council Bluffs**

<table>
<thead>
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<th>Disability Type</th>
<th>Council Bluffs Jurisdiction</th>
<th>Omaha-Council Bluffs Region</th>
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<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
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<tr>
<td>Hearing difficulty</td>
<td>2,740</td>
<td>4.82%</td>
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<tr>
<td>Vision difficulty</td>
<td>1,400</td>
<td>2.46%</td>
</tr>
<tr>
<td>Cognitive difficulty</td>
<td>3,318</td>
<td>5.84%</td>
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<tr>
<td>Ambulatory difficulty</td>
<td>4,472</td>
<td>7.87%</td>
</tr>
<tr>
<td>Self-care difficulty</td>
<td>1,297</td>
<td>2.28%</td>
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<tr>
<td>Independent living difficulty</td>
<td>2,851</td>
<td>5.02%</td>
</tr>
</tbody>
</table>

Note 1: All % represent a share of the total population within the jurisdiction or region.

Source: HUD Table 13, ACS

The disabled population does not have a concentration within a specific area in Council Bluffs. There are several retirement communities and senior projects within the City as well as two public housing facilities as outlined previously.
BELLEVUE

A total of 8,749 persons living in Bellevue have a type of disability. The majority are faced with an ambulatory difficulty (5.35%) as illustrated in the table below. The rates in Bellevue by disability type are similar to those in the Omaha-Council Bluffs region.

**Table V-72 Bellevue Disability by Type**

<table>
<thead>
<tr>
<th>Disability type</th>
<th>Bellevue, NE Jurisdiction</th>
<th>Omaha – Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Hearing difficulty</td>
<td>1,532</td>
<td>3.24%</td>
</tr>
<tr>
<td>Vision difficulty</td>
<td>736</td>
<td>1.56%</td>
</tr>
<tr>
<td>Cognitive difficulty</td>
<td>1,659</td>
<td>3.51%</td>
</tr>
<tr>
<td>Ambulatory difficulty</td>
<td>2,531</td>
<td>5.35%</td>
</tr>
<tr>
<td>Self-care difficulty</td>
<td>839</td>
<td>1.77%</td>
</tr>
<tr>
<td>Independent living difficulty</td>
<td>1,452</td>
<td>3.07%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>8,749</td>
<td></td>
</tr>
</tbody>
</table>

Source: HUD Table 13, ACS
In Bellevue, persons with disabilities are dispersed throughout the community which is comparable with the region as a whole. The HUD Map 14 shows that persons with disabilities distribution throughout the city limits.

There is a slight variation in the location of these protected classes. In both maps, persons with disabilities are more focused on the areas in southeast and northwest Bellevue. These areas are also associated with the older areas of the community with lower income levels and more affordable units.

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

OMAHA

Figure V-117 Disability Density by Age Omaha Council Bluffs Consortium

Source: HUD Map 15 Disability by Age Group

There does not appear to be a trend or pattern in the location regarding the age of persons with disabilities across the Omaha area.

COUNCIL BLUFFS

Facilities that accommodate disabled residents are located throughout the City.

BELLEVUE
The geographic location of individuals with a disability is similar when considering age and type of disability Citywide, the age group of 18 – 64 has the highest proportion of individuals with disabilities with 5.85%. This is similar to the Omaha-Council Bluffs metro area as a whole where the age group of 18 - 64 makes up 6.09% of the population. As with type of disability, the age groups are living more in the southeast and north central areas of Bellevue. There are no significant concentrations of individuals with self-care and independent living disabilities.

Table V-73 Bellevue Disability by Age

<table>
<thead>
<tr>
<th>Age of People with Disabilities</th>
<th>Bellevue, NE Jurisdiction</th>
<th>Omaha – Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Ages 5-17 with Disabilities</td>
<td>388</td>
<td>0.82%</td>
</tr>
<tr>
<td>Ages 18-64 with Disabilities</td>
<td>2,768</td>
<td>5.85%</td>
</tr>
<tr>
<td>Ages 65+ with Disabilities</td>
<td>1,873</td>
<td>3.96%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>5,029</td>
<td>88,154</td>
</tr>
</tbody>
</table>

Source: HUD Table 14, ACS
2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

OMAHA

The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments.

There is no specific comprehensive data set for the Omaha, NE area that identifies the location of affordable accessible housing units. There is also no comprehensive data on whether or not rents below $500 per month are accessible to the disability community.

COUNCIL BLUFFS

Despite long-term efforts to increase affordable, accessible housing in a range of unit sizes, this continues to be an obstacle for Council Bluffs. As stated previously, only 14% of units in the City have 4 or more bedrooms and only 2.4% have 5 or more bedrooms (American Fact Finder 2015 Update). This number decreases again when discussing accessible units.
BELLEVUE

HUD is unable to provide data at this time as there is limited nationally available disability related data. Specific data on privately-owned affordable, accessible housing is unavailable.

As discussed previously, the City has limited affordable housing stock available through public housing, Section 8 housing and HCV. Most single-family housing in general is not accessible to persons with disabilities specifically if the home was built prior to 1991 and the Fair Housing Act. The majority of Bellevue housing or 79 percent was built prior to 1990. Additionally, city staff during the development of the AFH stated that the state’s building codes have only recently caught up to the federal accessibility standard.

Although specific accessible housing data is unavailable, it is reasonable to conclude that these findings indicate that neither the City nor region has an adequate supply of affordable, accessible housing in a range of unit sizes.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated for the jurisdiction and region?

OMAHA

There are only two of the 12 R/ECAP regions that have more than 78 percent of affordable housing renter units making up the housing market.

Figure V-118 Percentage of Affordable Rental Units Omaha/Council Bluffs Consortium
COUNCIL BLUFFS

Council Bluffs is fortunate that accessible units are throughout the City. Affordability tends to be concentrated in the 51501 zip code which coincides with the poorest Census Tracts as well as areas of minority concentration. This is due to an older housing stock in 51501 compared to many new construction neighborhoods in zip code 51503.

BELLEVUE

HUD is unable to provide data at this time; single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards.

Bellevue has a total of 21,745 housing units with only 4,515 that were built since 1990 which leaves 79 percent of the housing units built prior to 1991 and fair housing requirements.
The location of limited publicly supported housing is dispersed throughout Bellevue, and does not appear to align with segregated areas.

c. **To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing for the jurisdiction and region?**

**OMAHA**

Over 30 percent of persons with disabilities in the Omaha jurisdiction and the Omaha-Council Bluffs jurisdiction live in public housing as well as over 20 percent in both areas living in Project-Based Section 8 Housing. Just over 20 percent of persons with disabilities in the two areas are part of the Housing Choice Voucher program. That means that almost 74 percent of the persons with disabilities received housing assistance.

**Table V-74 Omaha Consortia Disability and Publicly Supported Housing**
<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>People with a Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
</tr>
<tr>
<td>Public Housing</td>
<td>915</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>327</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>82</td>
</tr>
<tr>
<td>HCV Program</td>
<td>1,187</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>People with a Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
</tr>
<tr>
<td>Public Housing</td>
<td>1,831</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>685</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>164</td>
</tr>
<tr>
<td>HCV Program</td>
<td>1,395</td>
</tr>
</tbody>
</table>

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Source: HUD Table 15
Council Bluffs has two publicly supported housing complexes. Each are handicap accessible and adaptable as needed; however, neither support households with needs above two-bedroom. In these cases, vouchers must be used to provide housing assistance. Currently, half of public housing units are utilized by individuals with a disability.

Table V-75 Council Bluffs Disability and Publicly Supported Housing

<table>
<thead>
<tr>
<th>Council Bluffs Jurisdiction</th>
<th>People with a Disability</th>
<th>#</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td></td>
<td>144</td>
<td>50.00%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td></td>
<td>65</td>
<td>14.22%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td></td>
<td>11</td>
<td>24.44%</td>
</tr>
<tr>
<td>HCV Program</td>
<td></td>
<td>175</td>
<td>28.93%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Omaha-Council Bluffs Region</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Housing</td>
<td></td>
<td>916</td>
<td>30.45%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td></td>
<td>358</td>
<td>20.81%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td></td>
<td>82</td>
<td>23.50%</td>
</tr>
<tr>
<td>HCV Program</td>
<td></td>
<td>1,395</td>
<td>20.86%</td>
</tr>
</tbody>
</table>

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Source: HUD Table 15
Table V-76 Bellevue Disability and Publicly Supported Housing

<table>
<thead>
<tr>
<th>Bellevue Disability by Publicly Supported Housing Program Category</th>
<th>Bellevue, NE Jurisdiction</th>
<th>Omaha – Council Bluffs Region</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Public Housing</td>
<td>1</td>
<td>2.22%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>31</td>
<td>10.16%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>N/a</td>
<td>N/a</td>
</tr>
<tr>
<td>HCV Program</td>
<td>25</td>
<td>18.25%</td>
</tr>
</tbody>
</table>

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

In Bellevue, 2 percent of public housing residents have a disability which is significantly lower than Project-Based Section 8 and HCV Program residents which are 10 percent and 18 percent respectively. These numbers are also considerably lower than regional percentages. This also shows Bellevue’s limited public supported housing units available overall. Data is not available for type of disability or for other types of assisted housing.

These numbers indicate a need for affordable housing stock that is accessible. Public-supported housing units in Bellevue are fully-occupied with waiting list, which not only
demonstrated need but also the long wait to essentially access these units.

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

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

**OMAHA**

As noted in Table 15 above, over 30% of the areas disability community resides in the North Omaha and South Omaha area where most of the public housing, Project Based Section 8, Other Multi-family and HCV Program housing is located.

**COUNCIL BLUFFS**

Council Bluffs has several organizations that provide living accommodations for persons with disabilities living in instructions or other settings including VODEC (Vocational Development Center), Crossroads of Western Iowa and Mosaic. These organizations partner with multi-family complexes to provide family-style living for clients with onsite caretakers. These units are throughout the City in a variety of complexes. Single-family units also exist throughout the city to house individuals with disabilities but on a more limited basis.

**BELLEVUE**

Overall, persons with disabilities in publicly supported housing live throughout the City. Those with hearing, vision, or cognitive disability are living in a more integrated setting
than those with ambulatory, self-care and independent living disabilities which are found more in segregated settings due to housing options. Project-Based Section 8 are in eastern areas of Bellevue which are more aligned with those with ambulatory, self-care and independent living disabilities as shown in the maps below. Housing Choice Voucher holders are able to use vouchers throughout the community.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

OMAHA

The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive health care and supportive services from the provider of their choice.

There are very few options available for persons with disabilities to access affordable housing.

Good rehabilitation services improve function. Great rehabilitation services rebuild lives. QLI has become one of the nation’s premier post-hospital centers for brain and spinal cord injury rehabilitation by embracing the concept that great rehabilitation is more than just the science of physical recovery – it is the art of rebuilding a life. For more than two decades, QLI has set and raised the bar for working with individuals and families whose lives have been affected by brain injury or spinal cord injury. There are times in life when it is imperative that you seek out the best resources. QLI has a brand new, state of the art campus in Omaha.

Beyond the League of Human Dignity very few organizations provide support in modifying housing. Individuals with disabilities look for accessible housing just like any non-disabled individual by checking out various apartment complexes in the area. There is limited housing available under $500 per month. If they are fortunate enough
to find affordable housing, modifications/accommodations must be requested to their landlord.

COUNCIL BLUFFS

For single persons, the availability of accessible units is significantly higher than for families needing larger units. This is an area Council Bluffs realizes has shortfall.

BELLEVUE

Bellevue is faced with a lack of affordable housing to meet the needs of residents including those with disabilities who are faced with finding affordable and accessible units. The need for additional supportive housing in Bellevue has been identified, but is limited due to the location of many supportive services which are located in Douglas County and the lack of public transportation option to those services.

4. Disparities in Access to Opportunity

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

OMAHA

i. Government services and facilities

Local governments in the Omaha area have made substantial progress over the past decade in improving the availability of services for disabled persons, including the availability of information in alternate formats (for visually impaired), and interpreters and other support services to enable these residents to have access to information and services at public meetings or events.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Local government has reviewed infrastructure, including crosswalks, pedestrian lights, signage, parks and recreation facilities, city halls and other city facilities to improve accessibility for persons with disabilities. All facilities built since 1990 are accessible, and communities are making upgrades as funding allows to older buildings to address...
accessibility. The City of Omaha entered into a Department of Justice agreement in 2005 for a period of 10-years to address and become compliant with ADA Title II requirements. The City of Omaha completed that agreement in full in 2015. The agreement included updating old and enforcement of new sidewalks to be ADA-compliant. Sidewalks are inspected after installation for ADA compliance. The City works with the state department of transportation and developers when appropriate on the installation of pedestrian crossings and signals. Funding limitations are barriers to more comprehensively addressing needs in some areas. The City of Omaha encourages citizens to request reasonable accommodations and accessibility for public events.

iii. Transportation

According to the Local Disability Data for Planners 2005-2007 report, 1.6 percent of the disabled population used mass transit to get to work in Douglas County where only 1.0 percent of the population without a disability used mass transit. Seven percent of the disabled population in Douglas County worked from home compared to 3.6 percent of the population without a disability, and 81.7 percent used a car, truck or van to get to work compared to 90.6 percent of the non-disabled population.

Forty four percent of the disabled population in Douglas Country spend 1-15 minutes getting to their place of work, 36.9 percent spend 16-30 minutes, 4.1 percent spend 31-60 minutes, and less than 2 percent spend more than an hour getting to work.

iv. Proficient schools and educational programs

According to the Local Disability Data for Planners 2005-2007 report, 32 percent of the disabled population had at least a high school degree in Douglas County compared to 21 percent of the population without a disability. Only 15 percent had a Bachelor’s degree or higher compared to over 39 percent of the population without a disability.

v. Jobs

According to the 2010 Status Report released for Nebraska, 43.1 percent of the disabled population in the state were employed compared to 83.8 percent of the population without a disability. The Local Disability Data for Planner 2005-2007 report identified 45 percent of the disabled community employed in Douglas County. The largest percentage of those with a disability live below the poverty level in Douglas County with 21.3 percent living below 100 percent of the poverty level.
COUNCIL BLUFFS

i. Government services and facilities

The City and Pottawattamie County operate approximately 15 buildings with public access. Of these, all are accessible to persons with disabilities with the exception of the City’s Community Development Department located in the Fire Department Headquarters Station Building. However, staff in this department are able to meet individuals unable to navigate the steps in the lower level of the building (Community Hall) that is accessible via an ADA ramp. An additional fire station is also not ADA compliant but renovations are underway to reconstruct the interior of the fire station to meet compliance.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

All new sidewalks constructed are required to meet ADA requirements. The City continues to add pedestrian crossings and sidewalks to all projects to ensure access. As part of the Council Bluffs Code, all new construction projects require sidewalks and pedestrian crossings (where applicable) as part of the construction project.

iii. Transportation

The City collaborates with Metro Area Transit (MAT) for fixed routes and Southwest Iowa Transit Agency (SWITA) for paratransit, which is available to all Council Bluffs residents.

iv. Proficient schools and educational programs

Students with Individual Education Plans that call for specialized transportation based on a developmental or physical disability are able to get free transportation to the school that best fits his/her needs for educational development.
v. Jobs

Iowa residents with a disability are far less likely to be employed: Only 30 percent of working-age residents (16–64 years old) with a disability are employed compared to 66 percent of those with no disability and for those who are working, they earn less. The median annual earnings for an Iowa resident with a disability are $18,647 compared to $30,900 for a worker without a disability (American Community Survey, 2014). A total of 14 percent of adults in Iowa have a lasting physical, mental, or emotional disability that impedes them from being independent or able to work. Approximately 19 percent of Iowa residents aged 16 and over with a severe disability live in poverty, compared with 11 percent of the total population. Disability is generally disproportionately associated with age; in Iowa, 37 percent of residents 65 years or older are living with a disability, more than double the 14 percent average for all ages (American Community Survey, 2014). Additionally, while the overall unemployment rate for Iowa is 3.0%, it is 9.6% for persons with disabilities (Iowans with Disabilities: 2017, Attachment I).

Council Bluffs Code Ord. 5973 § 1, 2008 outlines the requirements for businesses concerning discrimination of individuals with disabilities (Attachment H).

BELLEVUE

i. Government services and facilities

Services offered by the City of Bellevue are offered at three buildings and at various parks throughout the community. The City has an ADA Committee that reviews, identifies and works to correct ADA issues at each location. While funding is limited, the Committee works with each department to address issues within the annual budget.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

With the age of Bellevue infrastructure, there are many areas and neighborhoods that lack sidewalks and curb ramps due to development prior to requirements being adopted. The City is working to install sidewalks and curb ramps in older areas in coordination with other public improvement projects. The City also works to address areas of concerns as they are brought to the attention of each department.

iii. Transportation

The City of Bellevue offers transportation service for those that are elderly and disabled during regular service hours. Those trips are limited by distance from the city limits.
Individuals with disabilities are more affected by the lack of transportation options offered within the community. The City’s is provided with one public transportation route into Omaha that runs only during the week.

iv. Proficient schools and educational programs

The schools provide educational opportunities for children with disabilities. According to stakeholders, Bellevue Public School buildings are generally accessible to persons with disabilities; unfortunately the school bus stops are not always accessible.

v. Jobs

According to the American Community Survey 2011-2015 5-year survey, Bellevue has a total of 1,679 individuals with a disability in the workforce. Of those individuals, 89 percent are employed. Unfortunately, there are 1,400 individuals with a disability that are not in the labor force.

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

OMAHA

On each page of the City of Omaha’s website and under the City of Omaha’s Department of Human Rights and Relations website, the City’s ADA Coordinator can be contacted to address barriers to City Programs, Services and Facilities and request accommodations and/or modifications . The City has an ADA Liaison Team to address ADA issues in a timely manner.

The Human Rights and Relations Department also addresses complaints of discrimination in Housing (Title VIII), Employment (Title VII), Public Accommodations and Title VI. The Department also enforces these laws through investigations, civil court, and settlement agreements.

METRO Transit also has an ADA Coordinator and addresses complaints from citizen transit riders and makes attempts to accommodate and/or modify issues related to
Transportation Services, Programs and Facilities.

COUNCIL BLUFFS

According to the Iowa Code, an employer is obligated to accommodate an employee’s disability under two prongs of the definition if disability: (1) actual and (2) record of impairment. There is no obligation to provide a reasonable accommodation for perceived disabilities. The employer must determine if the person has the requisite skill, education, experience and training as well as be able to perform the essential functions of the job with or without reasonable accommodation. If a qualified employee is unable to perform the essential job functions without a reasonable accommodation, the employee must request the reasonable accommodation and the employer must initiate an interactive process for determining what is reasonable. The interactive process has the following steps:

1. Analyze the particular job involved and determine its purpose and essential functions
2. Consult with the individual with a disability to ascertain the precise job-related limitations imposed by the individual’s disability and how those limitations could be overcome with a reasonable accommodation
3. In consultation with the individual to be accommodated, identify potential accommodations and assess the effectiveness each would have in enabling the individual to perform the essential functions of the position
4. Consider the preference of the individual to be accommodated, select, and implement the accommodation that is most appropriate for both the employee and the employer. This may not be the employee’s preference, but the solution that works best for both parties. Should the employee reject the proposed accommodation, he/she may be rendered unqualified for the position.

In order for the interactive process to work correctly, “both parties, not just the employer, have an obligation to participate in the interactive process. Should the employee fail to participate in good faith in the interactive process, he/she may be barred from asserting a failure-to-accommodate claim under the ADA (Attachment J).”

It is the policy and practice of the City of Bellevue to ensure exceptional public service by providing full access to programs, services, and activities for all members of the public, including persons with disabilities. The City continually strives to eliminate
barriers that may prevent persons with disabilities from access to or participation in City programs, services, activities, and facilities. The City will make reasonable modifications in policies, practices, and procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the City can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. Request for Reasonable Accommodations can be submitted to the City of Bellevue for consideration and more information is available on the City’s website.

BELLEVUE

The City of Bellevue will not discriminate against individuals with disabilities based on a disability in its services, programs, or activities in accordance with the requirements of title II of the Americans with Disabilities Act of 1990.

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

OMAHA

The challenge is for disabled persons on limited incomes to secure homeownership. in particular, those receiving SSI from Social Security. This level of income (SSI) does not enable disabled persons to qualify for many homeownership programs.

COUNCIL BLUFFS

Difficulties for individuals achieving homeownership in Council Bluffs tend towards two main issues: (1) finding accessible homes within the City’s affordable housing stock and (2) lack of income to qualify for a mortgage. Because of the age of the City’s housing stock, many homes are not accessible to those with physical disabilities. Additionally, the median earnings for Iowans at 16 and over with disabilities is $19,607 compared to those without disabilities is $30,964 (Iowans with Disabilities 2017, Attachment K).

BELLEVUE

The greatest difficulty facing persons with disabilities in homeowners is located an accessible home. Cost to renovate an existing home to make it accessible can be cost
prohibitive for many. Features such as no-step entries, bathrooms on the first floor, etc. Are not always common features among the available housing stock. With the area topography, many homes are split level or have stairs along entryways.

5. Disproportionate Housing Needs

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

OMAHA

The challenge is for disabled persons on limited incomes to secure housing. There is an insufficient supply of such housing and rents in the area are typically above $500. The typical SSI income does not enable disabled persons to secure adequate housing.

COUNCIL BLUFFS

The main housing need for disabled persons outlined is accessibility including entryways and interior doorways, bathrooms and kitchens. Because of the age of the housing stock in Council Bluffs, many homes unless previously converted do not meet the accessibility requirements of persons with disabilities.

BELLEVUE

Bellevue has limited public housing options which are even more limited when the unit needs to be fully accessible. It was noted that persons with disabilities are more likely to be low and moderate income and lack housing options due to accessibility.
6. Additional Information

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

OMAHA


COUNCIL BLUFFS

The City partners with the League of Human Dignity each year to complete barrier removal projects for income qualified disabled residents who specifically need entrance and bathroom modifications to his/her residence. After the initial assessment and investment, the City has continues working with the property owner to further update his/her property in order to increase the safety of the property.

Also, the City has collaborated with the Vocational Development Center (VODEC) of Council Bluffs to improve group home housing for disabled clients. This includes exterior improvements (ramps), kitchen updates for safety and relocation of laundry facilities for disability access.

Lastly, the City has provided HOME Investment Partnership Program (HOME) funds to the following HUD Section 811 projects:

1. Mosaic: Reconstruction of a 10-unit apartment complex into a 14-unit rehabilitation complex for persons with disabilities and mental illness.
2. Indian Creek Apartments: Construction of a 12-unit complex comprised of one and two-bedroom units to serve persons with disabilities only.
3. Plain View Apartments: 30-unit complex for individuals who are wholly physically disabled and require wheelchair accessibility.

Council Bluffs Municipal Code outlines the requirements for accommodation for persons with disabilities (Attachment O).
BELLEVUE

The City of Bellevue is faced with pedestrian accessibility due to the age of the community and infrastructure. While the city is working towards becoming a Complete Streets community, the improvement of pedestrian infrastructure is delayed due to cost and overwhelming need across the area.

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

OMAHA

- Source of income discrimination
- Access to transportation
- Location of accessible housing
- Occupancy codes and restrictions
- Lack access to opportunity due to high housing costs
- Lack of affordable accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based services
- Access to publicly supported housing

COUNCIL BLUFFS

Disability and Access
1. Lack of assistance for transitioning from institutional settings to integrated housing
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Inaccessible government facilities or services
6. Source of income discrimination
7. Lack of local public fair housing enforcement
Access to publicly supported housing for persons with disabilities:
As stated previously, Bellevue lacks publicly supported housing units. This impacts persons with disabilities at a greater level when needing accessible units. According to HUD Table 7, 50 of the 455, or 11%, publicly supported housing units are occupied by disabled individuals.

According to the Bellevue Housing Authority, accessible units are difficult to fill for public housing, but Section 8 Voucher holders have a difficult time finding rental units that are accessible due to the age of the affordable housing. There is not one area affected more than another by the available of accessible publicly supported housing and no public housing has been lost.

Access to transportation for persons with disabilities:
As discussed above, issues with transportation also affect persons with disabilities, although individuals with disabilities may be disproportionately affected by limited transportation options as they tend to rely more on public transportation. While Bellevue does offer a Specialized Transportation Service specifically for disabled and elderly residents, it is limited by the hours of services and locations of service. By limiting the hours of service, access to opportunities are limited.

Inaccessible public or private infrastructure:
Due to the age of the community, many of Bellevue’s existing infrastructure is deteriorating and some areas that were annexed after development lack necessary infrastructure.

Currently, many areas of infrastructure in Bellevue lack sidewalks, handicap accessible curb cuts, and APS signals due to the overall age of the community. As the City updates the infrastructure, accessibility is addressed. The increasing the timeliness of the improvements continues to face barriers such as limited resources. The City of Bellevue has an ADA Committee that reviews accessibility laws, regulations and guidance to ensure all issues or concerns within the community are addresses. Residents who experience barriers to accessibility can file an accommodation request for the City’s review and consideration.

Lack of affordable in-home or community-based supportive services:
While Bellevue does offer some services to disabled, many services are not well known. Also, Bellevue and Sarpy County lack supportive services which then requires residents to travel to Omaha and Douglas County to access services. This may add additional cost onto individuals with disabilities that may already be living on a fixed income.

Faced with these issues that may present a barrier to fair housing choice, services that are offered in Bellevue need to be highlighted and those only in Douglas County needed to be reviewed to determine the feasibility of offering the program in Bellevue and Sarpy County.

*Lack of affordable, accessible housing in range of unit sizes:*
With much of the housing stock built prior to the 1991 Fair Housing Act, many housing units are not accessible and modification may be cost prohibitive. Bellevue has a total of 21,745 housing units with only 4,515 that were built since 1990, which leaves 79 percent of the housing units built prior to 1991.

While the City of Bellevue can influence future development with zoning and code requirements, the existing housing stock built prior to 1991 will have accessibility issues. Currently, offer CDBG assistance to elderly and disabled households to address accessibility issues in owner occupied housing units. No known assistance is offered for rental units.

*Land use and zoning laws:*
With land available for development becoming limited, the City needs to review current land use and zoning laws to ensure all housing options are encouraged and to have mechanisms to require fair housing development such as inclusionary zoning.

Zoning requires should also be reviewed to ensure occupancy requirements for the land use do not prohibit fair housing choice.

*Lack of assistance for housing accessibility modification:*
City of Bellevue can influence future development with zoning and code requirements, the existing housing stock built prior to 1991 will have accessibility issues. Currently, the CDBG program, offers assistance to elderly and disabled households to address accessibility issues in owner occupied housing units. No known assistance is offered for rental units.

*Occupancy Codes and restrictions:*
The City of Bellevue reviews and updates ordinances regularly throughout the year with text amendments as necessary. In 2011, there was a complete update of the ordinances by a consulting firm. With continual updates, any recommended changes to occupancy codes or fair housing ordinances need to be reviewed by those affected by the change to ensure there is not a violation or hindrance to fair housing.

**Source of Income Discrimination:**
Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to Voucher Holders. Despite education and outreach from the Housing Authority staff, this continues with several large management companies in the jurisdiction.

**E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

1. List and summarize any of the following that have not been resolved:
• a charge or letter of finding from HUD concerning a violation of a civil rights-related law
• a cause determination from a substantially equivalent state or local fair housing agency concerning
• a violation of a state or local fair housing law
• a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law
• or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing
• a pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination

**TESTING OVERVIEW**

The Fair Housing Center of NE-IA (the Center), is a program of Family Housing Advisory Services, Inc. (FHAS) and serves all of Nebraska and Iowa. The Center was established (1994) as a full-service fair housing center under a HUD Fair Housing Initiatives Program (FHIP) grant for three years. The grant was applied for in order to expand the capacity of FHAS to address the problems experienced by its clients who were experiencing discrimination in their attempts to secure housing. Full-service fair housing centers include complaint intake and investigation of fair housing complaints, fair housing testing, education and outreach, and counseling and advocacy on behalf of persons who have experienced discrimination.

The Center operates the only HUD approved testing program in the two states. Testing is a process for gathering information on actual practices in the marketplace. Such information can then be used in measuring any differences in treatment, including the quality, content, and the quantity of information and service, given by real estate firms, rental property managers, private landlords, or other providers of housing including loans to determine if there is a difference in treatment based on race, color, sex, religion, national origin, disability, or familial status.

Testers are trained individuals who pose as home seekers. They visit real estate offices, apartment complexes, banks etc. and inquire about the availability of housing and or other services that are offered by the entity.

In addition to being funded by HUD, the Center has partnerships and conducted tests at the request of the Nebraska Equal Opportunity Commission, Omaha Human Rights and
Relations Department, the Lincoln Commission on Human Rights, the Iowa Civil Rights Commission, Sioux City Human Rights Commission, Davenport Civil Rights Commission, the Des Moines Civil & Human Rights Commission, and for the cities of Fremont NE and Dubuque, Iowa.

**TESTING DATA**

Between the years of 2011 and 2016 the Fair Housing Center of NE-IA (the Center), conducted a total of 275 tests in Omaha, Bellevue and Council Bluffs. The Center categorizes the results of the tests 3 ways, Evidence, Inconclusive or No Evidence. Evidence is determined when a housing provider:

- Does not make a unit available to an individual of a protected class
- Refuses to sell or rent to a person of a protected class
- Places different terms or conditions for occupancy on an individual of a protected class
- Will not allow a reasonable accommodation (waiver in policy) to a person with a disability
- Advertises or states a preference, limitation or discriminates based on a person's protected class
- Or a multi-family housing complex does not meet the design and construction requirements as set forth in the Fair Housing Act.

Inconclusive is determined when a housing provider shows some differences in treatment stated above, but not quite to the level of “evidence” as stated above. No Evidence is determined when a housing provider has treated both Testers’ equally.

Of the 275 tests conducted during 2011-2016:  
- 53 tests were determined as evidence  
- 94 tests were determined as inconclusive  
- 128 tests were determined as no evidence

Therefore, in over half (53%) of the tests conducted showed some type of differential treatment/or does not meet design and construction requirements.

The following is a breakdown by year, city/town, protected class and determination of the tests conducted.
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COUNCIL BLUFFS

According to the State of Iowa Civil Rights Commission (ICRC), the city has two open cases within Council Bluffs regarding reasonable accommodation for a person/s with disability claim. Both claims originate in the 51501 zip code, which is located in the western portion of the City including the West End, South End and Mid-City neighborhoods. Since 2015, the ICRC has fielded 10 cases regarding fair housing within the City of Council Bluffs. (Attachment M).
The Fair Housing Center of Nebraska & Iowa provided information regarding fair housing complaints within the City of Bellevue by year.

**Table V-77 Fair Housing Complaints Bellevue**

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**SOURCE:** Fair Housing Center of Nebraska & Iowa

The City of Bellevue is not party to unresolved legal issues or claims related to fair housing or civil rights.
2. Describe any state or local fair housing laws. What characteristics are protected under each law?

OMAHA

The Nebraska Fair Housing Act can be viewed in full in Attachment N.

COUNCIL BLUFFS

Council Bluffs Municipal Code has the following protected statutes as part of the Council Bluffs Civil Rights Commission (Chapter 1.40) (Attachment O):

• 1.40.030 – Definitions. Definitions of each civil rights phrases
• 1.40.080 – Unfair employment practices. Discrimination laws regarding employment, labor organizations, and hiring practices
• 1.40.090 – Unfair practices: accommodation or services. Regulations regarding accommodations regarding leasing, site management, and rental properties
• 1.40.100 – Unfair or discriminatory practices: Housing. Discrimination laws regarding real estate and rental property for housing activities
• 1.40.110 – Unfair credit practices. Discrimination laws for credit approval, loans, business licenses
• 1.40.120 – Unfair or discriminatory practices: Education. Discrimination of participation in extracurricular activities, programs, or other activities within educational institutions
• 1.40.130 – Aiding or abetting. Intentionally aid, abet, compel or coerce another person to engage in any of the practices declared unfair or discriminatory
• 1.40.200 – City employment. Fair employment practices and recruitment within the City positions.

BELLEVUE

The State of Nebraska Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, disability or familial status. Covered entities generally include residential property owners, property managers, realtors and multiple listing services. However, exemptions exist for
dwellings owned or operated by religious organization and bona fide private clubs for non-commercial purposes, housing for older persons, and owner-occupied private homes in which no more than three sleeping rooms are rented.

Unlawful housing practices generally include discrimination in the advertisement, acquisition (showing, negotiating for or transmitting offers for sale or rental), financing, or possession and enjoyment (terms, conditions, privileges) of residential property.

The housing law also contains provisions barring retaliation. Anyone who has opposed any practice made unlawful by the statutes or who has participated in any manner in any proceeding to enforce the statutes is protected.

The Nebraska Fair Housing Law does place a deadline on filing. From the date of any alleged harm, the time limit for a housing charge is 1 year.

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

OMAHA

Many groups are working in Omaha to provide different services and resources regarding fair housing. The following organizations are included in those whose mission includes providing information and outreach and/or enforcement resources:

- Fair Housing Center of NE & IA
- HUD Fair Housing Hotline
- City of Omaha Human Rights and Relations Department
- Mayor’s Fair Housing Advisory Committee
- Family Housing Advisory Services
- Metro Area Continuum of Care for the Homeless (MACCH) and partnering organizations
COUNCIL BLUFFS

The City works with a number of agencies to provide fair housing information:
1. Family Housing Advisory Services (regional): housing and financial counseling
2. Iowa Legal Aid (statewide): free civil legal service for income qualified
3. Heartland Family Service (regional): housing counseling and shelter service for homeless
4. League of Human Dignity (regional): assistance with housing modifications for income qualified disabled residents
5. Mosaic (regional): housing assistance for intellectually disabled
6. VODEC (regional): housing assistance for intellectually disabled as well as job assistance
7. Catholic Charities Domestic Violence and Sexual Assault Shelter (regional): housing assistance, financial and housing counseling for victims of domestic violence and sexual assault
8. MICAH House (local): housing counseling and shelter service for homeless families
9. Connections Area Agency on Aging (local): advocacy and assistance for senior and disabled populations regarding housing

Resources for the agencies vary based on size and types of programs. The City works with many of the above providers to provide Community Development Block Grant (CDBG) funds to support the organization and its work in Council Bluffs related to housing counseling, shelter service and home modifications.

BELLEVUE

The City of Bellevue has information regarding fair housing available for all residents and distributes the information directly to those who call requesting assistance or ask questions. Information regarding fair housing is also available on the City of Bellevue website. For fair housing concerns and enforcement, the City of Bellevue refers residents to the Fair Housing Center of NE & IA and to HUD Fair Housing hotline.
4. Additional Information

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

These charts show the total number of fair housing complaints received and investigated by the Center and are broken down by protected class and year. The first chart reflects the total number while the second chart reflects the numbers for Bellevue, Council Bluffs and Omaha.

| Fair Housing Complaints by protected class (#'s include all of NE and all of IA) |
|-------------------------------|---|---|---|---|---|---|---|
|                               | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | TOTAL |
| Race                          | 12   | 15   | 18   | 21   | 28   | 57   | 151   |
| Color                         | 0    | 0    | 0    | 0    | 0    | 0    | 0     |
| Sex                           | 5    | 6    | 13   | 7    | 3    | 11   | 45    |
| Religion                      | 1    | 1    | 3    | 2    | 0    | 1    | 8     |
| National Origin               | 19   | 13   | 16   | 6    | 21   | 32   | 107   |
| Disability                    | 141  | 154  | 159  | 230  | 200  | 270  | 1,154 |
| Familial Status               | 12   | 11   | 14   | 13   | 6    | 7    | 63    |
| Other *                       | 12   | 10   | 11   | 5    | 4    | 2    | 38    |
| TOTAL                         | 202  | 210  | 234  | 284  | 262  | 380  | 1,572 |
The chart below reflects the total number of complaints received and broken down by industry.

<table>
<thead>
<tr>
<th>Complaint Type ( #'s include all of NE and all of IA)</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental</td>
<td>194</td>
<td>207</td>
<td>233</td>
<td>279</td>
<td>262</td>
<td>373</td>
<td>1,548</td>
</tr>
<tr>
<td>Sales</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Lending</td>
<td>7</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Design and Construction</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>0</td>
<td>5</td>
<td>10</td>
</tr>
<tr>
<td>Advertising</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Insurance</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other*</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>TOTAL</td>
<td>202</td>
<td>210</td>
<td>234</td>
<td>284</td>
<td>262</td>
<td>380</td>
<td>1,572</td>
</tr>
</tbody>
</table>

*Other includes rent to own and predatory lending
The following is a further breakdown by industry of the charts from the previous pages. In 2011, all of the tests conducted in Omaha, Bellevue and Council Bluffs were rentals.

**Omaha 2012 (65)**
- 27 Disability, all rentals, 6 evidence, 1 inconclusive, 20 no evidence
- 2 Familial Status, both rentals, 1 evidence and 1 no evidence
- 1 Other (marital status), rental, no evidence
- 14 National Origin, 8 lending (2 inconclusive and 6 no evidence) 6 rentals (3 inconclusive and 3 no evidence)
- 20 Race, all rentals, 10 inconclusive and 10 no evidence
- 1 Sex, rental, inconclusive

**Bellevue 2012 (1)**
- 1 Familial Status, rental, inconclusive

**Council Bluffs 2012 (1)**
- 1 Race, sales, no evidence

**Omaha 2013 (26)**
- 6 Disability, all rentals 3 evidence, 3 no evidence
- 3 Familial Status, all rentals, 2 evidence, 1 no evidence
- 1 Other (Advertisement), evidence
- 2 National Origin, both rentals 1 evidence and 1 inconclusive
- 12 Race, 6 lending (3 inconclusive and 3 no evidence), 6 rentals, all no evidence
- 2 Sex, both rentals, both evidence

**Bellevue 2013 (6)**
- All rentals

**Council Bluffs 2013 (8)**
- All rentals

**Omaha 2014 (73)**
- All rentals
Bellevue 2014 (4)
- 1 Disability, rental, evidence
- 1 Familial Status, rental, no evidence
- 2 National Origin, both sales, both no evidence

Council Bluffs 2014 (2)
- 2 Disability, both rentals, 1 evidence and 1 no evidence

Omaha 2015 (16)
- 4 Disability, all rentals, 1 evidence 3 inconclusive
- 4 Race, all rentals, all no evidence
- 8 National Origin, all rentals, 1 evidence, 5 inconclusive, 2 no evidence

Bellevue 2015 (0)

Council Bluffs 2015 (0)

Omaha 2016 (23)
- 3 Disability, all rentals, 2 evidence and 1 no evidence
- 3 Race, 1 sales, no evidence, 2 rentals, no evidence
- 17 National Origin, 5 sales, no evidence, 12 rentals (2 evidence, 7 inconclusive, 3 no evidence)

Bellevue 2016 (4)
- 4 Race, all sales, 1 inconclusive and 3 no evidence
5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

OMAHA

- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations

COUNCIL BLUFFS

Fair Housing Enforcement, Outreach Capacity and Resources

1. Lack of local public fair housing enforcement
2. Lack of resources for fair housing agencies and organizations

BELLEVUE

Lack of local private fair housing outreach and enforcement
Private industry in Bellevue does not report fair housing outreach efforts. Without the knowledge of fair housing, reports of issues go unreported and then enforcement cannot take place. There is a need for additional awareness and information regarding fair housing for residents, landlords, property managers, realtors, and other housing professionals.

Lack of resources for fair housing agencies and organizations:
Bellevue lacks a site or office for the agencies and organizations supporting fair housing in our community. With limited fair housing services in the community, many complaints are referred to agencies in Omaha and HUD.
SECTION VI.
Fair Housing Goals and Priorities

GOAL SETTING PROCESS
Following the period of public engagement conducted for the Regional Fair Housing Assessment, program partners held meetings to analyze and interpret community comments alongside of HUD and local data in order to create regional fair housing goals. Each jurisdiction was also required to set goals specific to their community.

Regional program partners took the following required steps included in the HUD AFFH Rule Guidebook in order to set fair housing goals and priorities for the region and their corresponding jurisdictions:

“In the Assessment Tool, HUD provides a list of potential contributing factors in each section, accompanied by descriptions of those potential factors. Program participants must consider the HUD-provided list of potential fair housing contributing factors, along with the explanation of each factor, to determine whether any factor listed creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Program participants must also identify any other factors, not included on the HUD-provided list, if they create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. In addition to the analysis using HUD-provided data, local data, and local knowledge in each section of the AFH, the community participation process may be of assistance to program participants in helping to identify and prioritize the contributing factors that should be the focus of the AFH. Under the AFFH rule, program participants must:

- Identify fair housing issues and significant contributing factors;
- Prioritize contributing factors, giving highest priority to those factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance;
- Justify the prioritization of contributing factors; and
- Set priorities and goals to address the identified contributing factors and related fair housing issues (HUD, 2015)."

**FAIR HOUSING ISSUES AND CONTRIBUTING FACTORS**

City and Public Housing staff identified and prioritized the following contributing factors to fair housing issues as "medium" or "high" based on community engagement, HUD and local data for each jurisdiction.
### Omaha

### Contributing Factors of Jurisdiction

<table>
<thead>
<tr>
<th>Fair Housing Issue</th>
<th>Contributing factors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disparities in Access to Opportunity:</td>
<td></td>
</tr>
</tbody>
</table>
| Employment:                            | • Location of employers  
|                                         | • Lack of private investment in specific neighborhoods  
|                                         | • Lack of public investment in specific neighborhoods including services and amenities  
| Disparities in Access to Opportunity:   | • Availability, type, frequency, and reliability of public transportation  
| Transportation:                        | |  
| Disparities in Access to Opportunity:   | • Location of proficient schools and school assignment policies  
| Education:                             | • Lack of education in regards to landlord tenant laws  
| Disparities in Access to Opportunity:   | • Location of environmental health hazards  
| Environment:                           | • Environmental concerns associated with deteriorated and abandoned properties  
| Disparities in Access to Opportunity:   | • Location and type of affordable housing  
| Access to Low Poverty Neighborhoods:   | • Access to financial services  
|                                         | • Private discrimination  
|                                         | • Lack of access due to high housing costs  
|                                         | • Impediments to mobility  
|                                         | • Lending discrimination  
|                                         | • Lack of resources for fair housing agencies and organizations  
| Disparities in Access to Opportunity:   | • Community opposition  
| RECAP (Racially and/or Ethnically      | • Private discrimination  
| Concentrated Areas of Poverty):        | • Deteriorated and abandoned properties  
|                                         | • Displacement of residents due to economic pressures  
|                                         | • Lack of private investment in specific neighborhoods  
|                                         | • Lending discrimination  
|                                         | • Location and type of affordable housing  
|                                         | • Lack of affordable housing in a range of units and sizes  
|                                         | • Source of income discrimination  
|                                         | • Occupancy codes and restrictions  |
### Omaha

#### Contributing Factors of Jurisdiction

This information represents the priorities identified by Omaha through the public engagement process combined with HUD and local data.

<table>
<thead>
<tr>
<th>Fair Housing Issue</th>
<th>Contributing factors</th>
</tr>
</thead>
</table>
| **Disability and Access**| • Source of income discrimination  
                            • Access to transportation  
                            • Location of accessible housing  
                            • Occupancy codes and restrictions  
                            • Lack access to opportunity due to high housing costs  
                            • Lack of affordable accessible housing in a range of units and sizes  
                            • Lack of assistance for housing accessibility modifications  
                            • Lack of affordable in-home or community-based services  
                            • Access to publicly supported housing |
| **Segregation/Integration**| • Community opposition  
                            • Cultural attitudes regarding race and poverty  
                            • Access to publicly supported housing for people with disabilities  
                            • Location and type of affordable housing  
                            • Lack of private investment in specific neighborhoods  
                            • Land use and zoning laws  
                            • Lending discrimination  
                            • Source of income discrimination  
                            • Private discrimination |
| **Disproportionate Housing Needs**| • Availability of affordable units in a range of sizes  
                            • Deteriorated and abandoned properties  
                            • Source of income discrimination  
                            • Lack of private investment in specific neighborhoods |
| **Public Housing**       | • Community opposition  
                            • Source of income discrimination  
                            • Lack of private investment in specific neighborhoods  
                            • Occupancy codes and restrictions  
                            • Quality of affordable housing information programs  
                            • Siting selection policies, practices and decisions for publicly supported housing  
                            • Impediments to mobility  
                            • Lack of meaningful language access for individuals with limited English proficiency  
                            • Land use and zoning laws |
# Council Bluffs

## Contributing Factors of Jurisdiction

<table>
<thead>
<tr>
<th>Fair Housing Issue</th>
<th>Contributing factors</th>
</tr>
</thead>
</table>
| Disability and Access              | - Access to publicly supported housing  
- Inaccessible public or private infrastructure  
- Lack of affordable accessible housing in a range of units and sizes  
- Lack of assistance for housing accessibility modifications  
- Lack of affordable in-home or community-based services  
- Lack of local or regional cooperation |
| Segregation/Integration            | - Cultural attitudes regarding race and poverty  
- Access to publicly supported housing for people with disabilities  
- Lack of assistance for transitional housing from institutional settings to integrated housing |
| Disproportionate Housing Needs     | - Availability of affordable units in a range of sizes  
- Deteriorated and abandoned properties  
- Source of income discrimination  
- Lack of private investment in specific neighborhoods |
| Public Housing                     | - Community opposition  
- Source of income discrimination |
| Disparities in Access to Opportunity: Employment | - Location of employers  
- Lack of public investment in specific neighborhoods including services and amenities |
| Disparities in Access to Opportunity: Transportation | - Availability, type, frequency, and reliability of public transportation |
| Disparities in Access to Opportunity: Education | None |
| Disparities in Access to Opportunity: Environment | - Location of environmental health hazards |
| Access to Low Poverty Neighborhoods | - Location and type of affordable housing  
- Lack of access due to high housing costs  
- Impediments to mobility  
- Source of income discrimination |
## Bellevue Contributing Factors of Jurisdiction

This information represents the priorities identified by Bellevue through the public engagement process combined with HUD and local data.

<table>
<thead>
<tr>
<th>Fair Housing Issue</th>
<th>Contributing factors identified by Bellevue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability and Access</td>
<td>• Access to publicly supported housing</td>
</tr>
<tr>
<td></td>
<td>• Occupancy codes and restrictions</td>
</tr>
<tr>
<td></td>
<td>• Lack of affordable accessible housing in a range of units and sizes</td>
</tr>
<tr>
<td></td>
<td>• Land use and zoning laws</td>
</tr>
<tr>
<td></td>
<td>• Lack of local or regional cooperation</td>
</tr>
<tr>
<td></td>
<td>• Source of income discrimination</td>
</tr>
<tr>
<td></td>
<td>• Access to transportation</td>
</tr>
<tr>
<td></td>
<td>• Inaccessible public or private infrastructure</td>
</tr>
<tr>
<td></td>
<td>• Lack of affordable in-home or community-based services</td>
</tr>
<tr>
<td>Segregation/Integration</td>
<td>• Cultural attitudes regarding race and poverty</td>
</tr>
<tr>
<td></td>
<td>• Access to publicly supported housing for people with disabilities</td>
</tr>
<tr>
<td></td>
<td>• Private discrimination</td>
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<tr>
<td></td>
<td>• Community opposition</td>
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<tr>
<td></td>
<td>• Source of income discrimination</td>
</tr>
<tr>
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<td>• Land use and zoning laws</td>
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<tr>
<td>Disproportionate Housing Needs</td>
<td>• Availability of affordable units in a range of sizes</td>
</tr>
<tr>
<td></td>
<td>• Lending discrimination</td>
</tr>
<tr>
<td></td>
<td>• Source of income discrimination</td>
</tr>
<tr>
<td>Public Housing</td>
<td>• Land use and zoning laws</td>
</tr>
<tr>
<td></td>
<td>• Lack of meaningful language access to individuals with limited English proficiency</td>
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<td></td>
<td>• Source of income discrimination</td>
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<tr>
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<td>• Quality affordable housing information programs</td>
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<tr>
<td></td>
<td>• Siting selection policies, practices, and decisions for publicly supported housing</td>
</tr>
<tr>
<td>Disparities in Access to Opportunity: Employment</td>
<td>• Location of employers</td>
</tr>
<tr>
<td>Disparities in Access to Opportunity: Transportation</td>
<td>• Availability, type, frequency, and reliability of public transportation</td>
</tr>
<tr>
<td>Disparities in Access to Opportunity: Education</td>
<td>None</td>
</tr>
<tr>
<td>Disparities in Access to Opportunity: Environment</td>
<td>None</td>
</tr>
<tr>
<td>Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods</td>
<td>• Location and type of affordable housing</td>
</tr>
<tr>
<td></td>
<td>• Lack of private investment</td>
</tr>
<tr>
<td></td>
<td>• Lack of regional cooperation</td>
</tr>
<tr>
<td></td>
<td>• Lack of resources for fair housing agencies and organizations</td>
</tr>
</tbody>
</table>
After identifying and prioritizing fair housing issues and contributing factors in each jurisdiction, program partners collaborated to determine common factors across the region. The following contributing factors were identified as medium and high priorities in each of the fair housing categories across the region:

**Segregation/Integration:**
- Community opposition including cultural attitudes regarding ability, race and poverty
- Access to publicly supported housing for people with disabilities
- Land use and zoning laws

**R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty):**
- Lack of private investment
- Deteriorated and abandoned properties
- Lack of affordable housing in a range of units and sizes

**Disparities in Access to Opportunity:**

**EDUCATION (Access to Proficient Schools)**
- Lack of job/skills training programs for youth and adults
- Lack of support for families in areas including transportation, childcare, and health centers
- Lack of education regarding landlord tenant laws, financial services, and home ownership in multiple languages

**EMPLOYMENT**
- Location of employers
- Lack of private investment in specific neighborhoods
- Lack of affordable housing near major employers
- Lack of employers who provide housing and/or transportation for employees

**TRANSPORTATION**
- Lack of availability, type, frequency, and reliability of public transportation
- Lack of affordable housing along transit routes
- Lack of transportation resources for elderly residents and persons with disabilities

**ENVIRONMENT (Access to Environmentally Health Neighborhoods)**
- Age and deteriorating housing stock associated with environmental hazards such as lead, mold, asbestos, and radon
- Insects and rodents
- Noise pollution

**ACCESS TO LOW POVERTY NEIGHBORHOODS**
- Access to financial services
- Lack of resources for fair housing agencies and organizations
- Source of income discrimination regarding housing vouchers and SSI
- Lack of affordable housing policy

**Disproportionate Housing Needs**
- Location and type of affordable housing and lack of affordable housing in a range of units and sizes
- Source of income discrimination
- Deteriorated and abandoned properties

**Disability and Access**
- Lack of access to transportation
- Lack of affordable, accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications

**Publicly Supported Housing**
- Community opposition
- Impediments to mobility
- Quality and affordable housing information
The following goals were created in order to address previously identified issues regarding fair housing. Bullet points indicate important actions steps.

**Goals NE-IA Region**

1. Increase accessibility of public transportation through education, outreach, and advocacy:
   - Work with the CTC Education and Advocacy committee to provide education and increase outreach regarding methods of public transportation, ride sharing services, and accessibility.
   - Assist MAPA in developing and disseminating a resource guide with options and/or requirements for specific transit programs.
   - Partner and advocate for supportive land use policies regarding transportation.

2. Expand mobility for housing choice voucher holders in high opportunity areas:
   - Increase the quality of outreach to landlords about housing choice programs.
   - Create a resource for voucher holders to understand and evaluate options that meet their needs.
   - Evaluating policies for setting payment standards between regional housing authorities.

3. Increase the supply of housing units for residents who are disabled and/or elderly across the region with a special focus on high opportunity areas:
   - Petition the states of Iowa and Nebraska to incentivize development of affordable and accessible units in housing projects that receive state funding.
   - Housing and Community Development Divisions will advocate for providing an allotment of housing rehab funds for accessibility modifications.
   - Jurisdictions with HOME funds will revise HOME applications to include criteria or the accumulation of points for development of accessible affordable housing in areas of high opportunity.
   - Regional partners will promote and support the inclusion of universal design standards into building codes.

4. Develop public-private partnerships with Housing Development divisions, the business community, and philanthropic groups to increase private development in R/ECAP, low-income, and high-poverty neighborhoods:
• Create partnerships with the Greater Omaha Chamber of Commerce and philanthropic groups.
• Find a currently established group that could focus energy and resources to create an asset inventory on a neighborhood level and a regional economic development level.
• Look for opportunities to coordinate as a region to apply for economic development opportunities.

5. Improve the environmental health of neighborhoods (with a focus on those in areas identified as meeting the requirements for federal assistance) by addressing deteriorated and abandoned properties, walkability, and transportation options:

• Research best practices, evaluate programs, and make recommendations to improve the process currently in place to address properties with code violations.
• Increase awareness of programs and agencies that may assist with hazard abatement.
• Promote information on how and where to report code violations.

6. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing throughout the region:

• PHAs from region will attend meetings among human service providers regarding supportive services.
• Evaluate ways housing agencies might partner with regional service providers could assist in moving more resources to supportive services and increase stability for public housing residents.
• Attend Metro Area Continuum of Care meetings to collaborate and share information.

7. Creation of a Task Force to help promote fair housing goals, increase access to opportunity for protected classes, and prevent further inequity in housing:

• Advocate, educate, and disseminate fair housing information.
• Ensure the completion of Analysis of Impediments (AI) goals in a timely manner.
• Cost-benefit analysis of current regional policies impacting housing and development.

8. Provide a central fair housing resource to support education and access to opportunities in the region.
• The creation of a dynamic website where regional residents can find updates on the AI initiative, information about fair housing resources, and links to partnering organization and services.
• Work with the Mayor’s Fair Housing advisory board to create a marketing plan to promote the fair housing website across the city.
• Use the website to provide updates on goals to the community.

**Goals City of Omaha**

1. Increase the amount of affordable housing stock in high opportunity areas in Omaha:
   • Collaborate with the Heartland 2050 Housing Affordability and Funding working group to promote education and advocacy for affordable housing across the city.
   • Evaluate current incentives for the development of affordable housing and look for opportunities to expand and increase incentives.
   • Create a mechanism for prioritizing fair and affordable housing elements in the proposal and selection process of projects requesting federal and state funding through City Planning Department programs.

2. Outreach to Omaha’s refugee and new immigrant populations with tools that provide information regarding local rights and duties of landlords and tenant rights and responsibilities in order to help prevent against private discrimination:
   • Creation of brochures regarding landlord tenant laws, rights, and responsibilities and contact information for reporting discrimination in the six most widely spoken languages in addition to English for the region.
   • Create a video on landlord tenant rights and responsibilities for those who may not be able to read in their native language.
   • Conduct workshops presenting landlord/tenant information, rights and responsibilities to multiple refugee and new immigrant populations.

3. Provide opportunities for community conversations on topics related to the history and future of segregation and integration in Omaha:
   • Create opportunities for community-led events focused on stigma and stereotypes about race and poverty, redlining, and neighborhood revitalization.
• Seek opportunities to promote public art installations that reflecting the history of segregation and/or the conversations held about integration and moving forward together as a community.
• Meeting with City Council members providing information on the potential impacts of SID annexation on segregation and accessibility.
• Work to increase neighborhood capacity and support neighborhood-based planning

4. Increasing awareness and access for the disability and LEP communities in all City of Omaha programs and communications:

• Address communication for LEP communities and ADA accessibility statements for all City communications and public engagement.
• Training for all city managers on resources available for translation and ADA accommodations provided through the Human Rights and Relations Department.
• Work to identify liaisons in the community that can assist the City in reaching out to the LEP community for events and with program opportunities.

5. Provide mobility and/or affordable housing options for elderly and disabled populations who currently live in homes with multiple floors but cannot access or use amenities while simultaneously opening up opportunities for large family housing to serve refugee and new immigrant populations:

• Identify/find/recruit development partners interested in investing in affordable aging/disabled housing.
• Find a non-profit partner to help facilitate education on benefits of living in housing designed to provide amenities specifically for aging/disabled population.
• Work with non-profit partners to prepare refugee/new immigrant families for home ownership and/or renting homes that become available.

6. Increase funding for programs focused on demolition or rehabilitation of abandoned buildings and the sustainable management and development of vacant lots in eastern Omaha:

• Create a team including the City of Omaha, Omaha Municipal Land Bank, and Habitat for Humanity who can create a strategic plan and leverage funds to address abandoned and vacant properties and improve the quality of life in neighborhoods in R/ECAP areas.
Work to diversify funding for rehabilitation of homes and vacant lots and use current redevelopment plans to identify places for projects/strategic use of funds to improve neighborhoods in R/ECAP areas. Identify best practices for sustainable and low maintenance vacant lot management in R/ECAP areas. Explore funding sources to help persons who qualify as 60% or less of AMI who live in R/ECAP areas maintain their homes and avoid code violations.

7. Reduce barriers to infill development in R/ECAP communities:
   - Research infill development best practices for cities with similar size and demographics.
   - Identify and address barriers through research and design of local codes.
   - Implement zoning practices that meet the needs of neighborhoods and encourage infill.

8. Create effective network of communication between City Departments and the community:
   - Create a new public engagement strategy for Housing and Community Development to disseminate and collect information from residents/neighborhoods/stakeholders.
   - Create and distribute presentations on AI data to share with neighborhood and community groups.
   - Hold workshops for the public on city departments and processes.

Goals Douglas County Housing Authority (DCHA):

1. Promote, educate, and advocate for building new housing developments in high opportunity areas within a range of sizes and for a variety of household types and levels of income.
   - Educate private landlords, developers, public entities, and network with service agencies as opportunities present. (ongoing)
• Develop informational materials for local governments and community organizations to use to educate the public for the need for affordable housing. (by 1/2019)
• Coordinate with private developers and partnering agencies for “mainstream housing” vouchers for people with disabilities, nonelderly. Apply (by 10/2018)
• Research housing trust funds (i.e. Oregon) to determine feasibility of incentive housing for HCV recipients (by 6/2019)

2. Promote and advocate for additional transportation options in currently underserved (transportation) areas of the county (i.e. Western Douglas County). (ongoing)
   • Request a seat and attend transportation committee meetings (by 7/2018).
   • Develop a directory of current case management, social service providers, churches and transportation grant holders for underserved (transportation)(by 6/2019)

Goals Council Bluffs

1. Increase quality and number of affordable housing units for a variety of household types.
   • NeighborWorks Home Solutions becomes Community-Based Development Organization (CBDO) by December 2018
   • Advocate and prioritize funding for seniors and affordable housing along transit corridors, and in close proximity to health care, retail, and recreational facilities (ongoing)
   • Provide emergency assistance for the immediate repair and correction of hazardous housing conditions, which represent a threat to the health, safety, and well-being of the occupant(s) (ongoing)
   • Target the use of CDBG funds to support economically viable rehabilitation in homes for low-income members of protected classes to enable them to remain in their properties (ongoing).
   • Increase the number of housing options with more than 3 bedrooms by 5% in the next 10 years.
   • Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation by 2020.

2. Promote opportunities to move homeless into stable permanent housing.
• Increase the number of permanent supporting housing options for the chronically homeless by 5% in 10 years
• Increase the number of handicap accessible permanent supportive housing options for the chronically homeless by 3% in 5 years.
• Continue support of nonprofit agencies providing homeless services in Council Bluffs (Ongoing)

3. Improve the environmental health of Council Bluffs.

• Return vacant and blighted properties back into productive use by analyzing disposition policy and recommending changes and applying for EPA Brownfield grants (Ongoing)
• Explore funding opportunities for Healthy Homes program to protect property occupants from environmental hazards including lead-based paint and improve energy efficiency. Lead safe and mold free (July 2019)
• Work to reduce flooding within Council Bluffs by exploring new policies and practices around stormwater management (Ongoing)
• Attend the 2018 National Lead and Healthy Housing Conference

4. Increase knowledge of local assistance programs and fair housing laws to disabled, limited English, and high poverty populations including but not limited to private businesses, nonprofit assistance and City programs.

• Revise and expand Language Access Plan (LAP) by December 2019
• Expand fair housing outreach, education and enforcement activities and continue support for housing counseling agencies to provide tenant counseling to enable low-income households to remain in their rental units (Ongoing)
• Establish a fair housing education FAQ for landlords, realtors, and lenders and continue to focus programs and activities to prevent housing foreclosure and displacement (December 2018)
• Utilize various media outlets to inform the public about issues related to fair housing programs and reports

5. Work with local employers to increase the number of quality jobs.

• Adopt economic development strategies that target development, retention and expansion of firms and industries that provide living wages (December 2018)
• Provide support to nonprofit groups to assist low-income families in accessing programs to increase household financial stability (Ongoing)
• Assist Advance Southwest Iowa Corporation with their business assistance, retention, expansion and new to market business programs (Ongoing)
• Work with Iowa Western Community College for technical training programs geared toward specific jobs
6. Utilize outside funding sources to better leverage resources for local community development projects.

- Provide leveraged financing and recommend allocating federal funding and Low Income Housing Tax Credits (LIHTC) for mixed-income projects that are consistent and support redevelopment plans in priority areas (Ongoing)
- Establish ongoing meetings with the state of Iowa to discuss housing policy and other issues related to community development (June 2018)
- Revise footprint of City’s Neighborhood Revitalization Strategy Area to meet changes in demographics (December 2019)
- Advocate the Council Bluffs Housing Trust Fund to provide funding at a higher percentage to disabled persons and low-income persons (June 2018)

7. Improve and increase Council Bluffs transportation options including public transit, trails and sidewalks to benefit all citizens of Council Bluffs.

- Form partnerships between local governments and private employers to develop transportation options that connect low income and protected populations with job opportunities
- Adopt and implement complementary mobility options such as walking, biking car sharing
- Plan and execute a Bus Ridership program for Human Services/Resource Professionals
- Provide information to the Southwest Iowa Transportation Authority and other transportation providers regarding potential bus routes that would meet current needs within the CB community

Goals CBMHA

4. Expand mobility for housing choice voucher holders in high opportunity areas.

- Hold a stakeholder meeting with local landlords and housing choice voucher program staff to discuss what type of information would be most helpful to have and share with landlords (December 2018).
- Create a landlord survey in order to collect data about participation in the housing choice voucher program including why landlords do or do not participate in the program and what incentivizes or prevents their participation (June 2019).
- Research best practices in housing choice programs for cities similar to the Omaha region (December 2019).
- Present survey results and best practices at annual event for landlords (June 2020).
5. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing.

- Municipal Housing Agency will maintain partnership with Human Services Advisory Council (2018-2023).
- Municipal Housing Agency will work closely with local human services agencies to provide tenants with contact information of services they may be able to utilize (2018-2023).
- Municipal Housing Agency will work to create a guidebook of local human services agencies to provide tenants/participants with information of services they may be able to utilize (December 2018).
- Municipal Housing Agency will develop life skills curriculum and teach classes in the area of budgeting, housekeeping, and other life skills areas (December 2018).
- Municipal Housing Agency will teach classes in the area of budgeting, housekeeping and other life skills (2018-2023).
- Municipal Housing Agency will develop relationships with outside entities to provide information and resources for tenants in the area of life skills (2018-2023).

6. Renovate current units to make more accessible to tenants.

- Municipal Housing Agency will continue to apply for grant money through the Council Bluffs Housing Trust fund to renovate current units to make them more accessible (2018-2023).
- Municipal Housing Agency will work with local contractors to provide renovations to current units with money gained through Housing Trust Fund grant (2018-2023).
- Municipal Housing Agency will work tenants to meet needs through Reasonable Accommodations to renovate units to make them more accessible (2018-2023).

**Goals Bellevue**

7. Increase affordable housing opportunities to expand housing choice by increasing quality and quantity of affordable housing units and the number of participating landlords in the jurisdiction.
- Research partners and funding sources to conduct a housing market study for the community and identify opportunities to use the study to enhance development and developer partnerships.
- Review possible developer incentives to increase development of affordable housing and meet with necessary partners to develop, prepare and adopt incentives.
- Determine prospects to increase the available funding and programs for housing rehabilitation programs in the community.
- Work with City officials and departments to review current criteria for determining city project need to include accessibility and housing issues.

8. Identify opportunities to safeguard current and future zoning ordinances to encourage the development of affordable housing stock as well as utilize occupancy requirements that do not hinder fair housing choice.

- Work with local planning department to review current land zoning and develop proposal to increase multi-family zoning.
- Increase infill development opportunities by reviewing regulations and best practices to identify possible changes to the current regulations and develop proposals.
- Research opportunities to increase the percentage of newly constructed housing units that are affordable and accessible to people with disabilities.

9. Provide opportunities to alter the perceptions of community exclusion and diffuse opposition to affordable housing through knowledge and education.

- Research proactive marketing strategies to enhance community image and identify community stakeholders to assist with development of community strategies to propel movement forward.
- Identify possible funding sources to assist with marketing strategies specific for the community.
- Identify prospects to address Bellevue’s aging infrastructure and necessary updates to ensure all residents have accessibility to services.
- Work with the City of Bellevue ADA Committee to review current status of ADA Transition plan and infrastructure needs in the community along with identifying funding sources for assistance.
- Develop programs and assistance to address housing accessibility modification needs.
10. Increase homeownership opportunities through financial literacy and promoting equitable access to credit and home lending.

- Identify partners, specifically lending agencies, to assist with reviewing current lending concerns to identify areas of opportunities for education and assistance.
- Enhance educational materials and expand distribution and availability of materials.

11. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.

- Conduct asset mapping project to locally available housing and public services.
- Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
- Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

12. Increase the overall knowledge and understanding of fair housing with the community’s developers, real estate professionals, financial institutions, elected officials and residents.

- Identify interested partners to facilitate fair housing workshops for landlords and housing providers
- Share and distribute fair housing information for renters.
- Work with local multi-family housing providers to provide information and education about fair housing to managements officials and tenants.

Goals BHA

4. Work to change community perceptions of opposition and community exclusion.

- Determine the feasibility of adding source of income as a protected class and research other community best practices.
- Assess the community and elected officials buy-in for the addition of a protected class to prevent discrimination in housing choice.
5. Develop access to publicly supported housing for all residents.

- Review and develop a Limited English Proficiency Plan with assistance for other community organizations and stakeholders.
- Review housing needs compared to make p of the waiting list to determine need for accessible units and draft proposal to make necessary modification.

6. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.

- Conduct asset mapping project to locally available housing and public services.
- Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
- Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.
- Review best practices and options for admissions and wait list policies and implements and proposed changes.
- Assist with implementation of a housing navigator program and research additional funding sources for continuation of the program.
References


