City of Baton Rouge and Parish of East Baton Rouge Assessment of Fair Housing

Public draft February 5, 2020





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Section I. Cover Sheet

Cover Sheet

1.

Submission date: March XX, 2020

2.	Submitter name: City of Baton Rouge and Parish of East Baton Rouge					
3.	Type of submission: Single program participant					
1.	Type of program participant(s): Consolidated Plan participant					
5.	For PHAs, Jurisdiction in which the program participant is located: $\ensuremath{\mathrm{N}/\mathrm{A}}$					
ó .	Submitter members (if applicable): N/A					
7.	Sole or lead submitter contact information:					
	Christopher Tyson President and CEO Build Baton Rouge, the Redevelopment Authority of East Baton Rouge Parish On behalf of the City of Baton Rouge, Parish of East Baton Rouge 620 Florida Street, Suite 110 Baton Rouge, LA 70801					
3.	Period covered by this assessment: 2020 - 2024					
9.	Initial, amended, or renewal AFH: Initial					
10.	To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;					
11.	The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ $91.225(a)(1)$, $91.325(a)(1)$, $91.425(a)(1)$, $570.487(b)(1)$, 570.601 , $903.7(o)$, and $903.15(d)$, as applicable.					
	All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.					
	(Signature) (date)					
	(Signature) (date)					
12.	Departmental acceptance or non-acceptance:					
	(Signature) (date)					

Section II. Executive Summary

Executive Summary

[To be completed after the conclusion of the community participation process]

Section III. Community Participation Process

Community Participation Process

Describe outreach activities undertaken to encourage and broaden meaningful community participation in the Assessment of Fair Housing (AFH) process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as racially or ethnically concentrated areas of poverty R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The Louisiana Fair Housing Action Center (LaFHAC) and BUILD Baton Rouge, the Redevelopment Authority of East Baton Rouge Parish (BBR) undertook a number of activities to broaden and encourage meaningful community participation. Steps that were taken to ensure meaningful community participation are as follows:

Stakeholder Meetings

LaFHAC and BBR conducted a number of stakeholder meetings with key agencies, businesses, and organizations that could provide information and data, share community needs, and help disseminate information about the AFH process.

Housing First Alliance of the Capital Area	September 9th, 2019
East Baton Rouge Redevelopment Authority	September 9 th , 2019
East Baton Rouge Parish Housing Authority	September 9 th , 2019
Southeast Louisiana Legal Services	September 9 th , 2019
City-Parish Office of Community Development	September 12th, 2019
Tanner Strohschein – The Cloud, LLC	October 3 rd , 2019

(local housing developer)

Better Together Baton Rouge October 17th, 2019

Public Community Meetings/Hearings

Community outreach and feedback was also solicited at multiple community meetings. Meeting dates were as follows:

1st Public Comment Session: November 18th, 20192nd Public Comment Session: February ____, 2020

Other Outreach

BUILD Baton Rouge's Facebook page posted information about the first public comment session on November 15, 2019 (https://www.facebook.com/buildbatonrouge/)

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The first public comment session was advertised in the VOTE and Power Coalition e-newsletters the week of November 11, 2019.

The first public comment session was shared with Foundation for Louisiana's Baton Rouge LEAD housing cohort the week of November 11, 2019.

LaFHAC discussed the AFH process and sought feedback from participants at the My Louisiana Summit on October 3, 2019.

LaFHAC discussed the AFH process and sought feedback from participants at the Housing First Alliance of the Capital Area meeting on July 31, 2019.

Outreach Activities Description for R/ECAPs, LEP, Persons with Disabilities

The first public comment session was held in a public library directly adjacent to a R/ECAP area and close to two others.

All written information about the AFH public comment session was advertised in English and Spanish and people with limited English proficiency were encourage to contact BBR to request interpretation.

All AFH meetings were conducted at facilities that are accessible to people with mobility impairments and ASL interpretation was advertised as available upon request.

Provide a list of organizations consulted during the community participation process

BUILD Baton Rouge

VOTE Baton Rouge

Power Coalition

Foundation for Louisiana's Baton Rouge LEAD housing cohort

My Louisiana Summit

Housing First Alliance of the Capital Area

Habitat for Humanity of Greater Baton Rouge

*For a full list of organizations invited to participate in the process see Appendix A

How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

21 members of the public attended the first public comment session where they heard from BBR and LaFHAC about the history of segregation in United States and Baton Rouge, the AFFH rule, and the Baton Rouge AFH process. Attendees then broke into small groups and filled out a survey about fair housing issues and barriers in their community. After facilitated small group discussions of their survey responses, they reported out to the full group.

Catton door

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

Overall comments from the 1st Public Comment Session at the Scotlandville Public Library, noted below by survey question:

1. What are the greatest housing problems in Baton Rouge right now?

- o Number of affordable housing units/number of poor quality rental housing
- o Lack of student housing; luxurious housing; low quality of life
- Access to quality housing and affordable homes
- o Locating affordable housing in all areas; being located near decent schools
- Still flooded homes not repaired; shortage of affordable rental and owner-occupied housing; builders more in the higher end brand and better homes not a focus
- Flooded homes/ rental/ affordable housing
- Large number of flooded homes not being repaired: landlords not repairing, rent increase
- o Available low income housing (affordable & quality); rental fees increase
- Disparities in funding; demographic (centralized and minorities) poorer areas/fewer resources; segregation
- Blight and home repairs
- o Affordability and quality
- o Not enough affordable housing
- o Landlords without good housing
- Access to equitable education, quality homes, grocery stores, quality transportation, access to loans, etc.
- O Dilapidated houses, overgrown lawns, trash pick-up, and home values
- o Funding for poverty stricken clients is limited
- Lack of quality affordable housing available, especially near a tech/community college. Too much blight.
- Lack of truly affordable housing

Cood askasla

Available housing and affordable housing

2. In your experience, which of the following are generally available either in your neighborhood or close to your neighborhood?

0	Good schools	b attendees
0	Good jobs and economic opportunities	8 attendees
0	Quality health care	9 attendees
0	Access to healthy food	11 attendees
0	Access to public transportation options that work for your family	10 attendees
0	Parks, swimming pools or other recreational facilities	12 attendees
Aros	you concorned about high loyels of any of the following in your neigh	shorbood?

3. Are you concerned about high levels of any of the following in your neighborhood?

0	Rising rents/home prices pushing people out	11 attendees
0	Unoccupied blighted homes or lots	13 attendees
0	Unsafe occupied homes (with mold, leaks, fire hazards, etc.)	12 attendees
0	Violent crime and/or gun violence	11 attendees
0	Exposure to environmental health hazards	10 attendees
0	Poverty	11 attendees

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o Racial segregation......10 attendees

4. When the City or State makes investments in Baton Rouge (for example, on streets, schools, parks, drainage, business development, or other projects), do you think all communities benefit from those investments fairly and equally?

- o "Yes, investments are always fair"...... 0 attendees
- o "Sometimes investments are fair, but sometimes neighborhoods get left out".... 8 attendees
- "No, investments are not made fairly in all neighborhoods"..... 11 attendees

5. Please share additional public comments:

- o Credit worthiness is a barrier for homeownership
- We're only starting to address food deserts, more work is needed
- o Cap on rental rates and diversification of neighborhoods
- Lack of student housing
- No medical providers in Old South Baton Rouge
- o Prevalence of illegal dumping
- Infrastructure and transportation (drainage)
- o High crime rate in Tigerland (off of Nicholson-Tiger Plaza)
- Credit Quality
- o I-10 widening affects residents of Old South Baton Rouge
- o Segregation in housing is also enforced within public school systems
- Low-income schools placed in black/brown communities; disparities in funding related as well
- Low-income housing areas have poor drainage: flood of 2016 impacted low-income areas the most
- Lack of accessible urgent care increases sickness & death rates
- o There's an obvious difference when you cross Florida Blvd
- Store fronts, yards, schools, parks and roads are not taken care of equally throughout the city

Section IV. Assessment of Past Goals and Actions

Assessment of Past Goals and Actions

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.

The 2010 East Baton Rouge Parish Analysis of Impediments' goals rely largely on a 2009 statewide Analysis of Impediments (AI) initiated by the Louisiana Office of Community Development. Those statewide goals, listed below, focus on education and coordination and include few efforts to address the public sector's historical and continued role in perpetuating segregated living patterns.

- 1. Improve Fair Housing Capacity
- 2. Improve Communication & Coordination between agencies with an interest in fair housing
- 3. Enhance understanding of fair housing for both consumers and providers: education/outreach/financial literacy

The 2010 AI also includes a small list of "Suggested Actions to Consider" specific to East Baton Rouge Parish. Not surprisingly, these actions also focus on education and outreach and offer no specific recommendations for addressing public sector policies that perpetuate segregation. The list includes:

- 1. Participate in the proposed Louisiana Fair Housing Working Group (FHWG)
- 2. Increase fair housing outreach and education to East Baton Rouge residents
- 3. Enhance homebuyer education activities, increasing financial literacy
- 4. Monitor current and upcoming housing projects to be certain that they comply with ADA and fair housing law for the disabled
- 5. Enhance educational opportunities for existing landlords in East Baton Rouge
- 6. Review inclusiveness of housing development projects, including efforts to eliminate segregation of racial and ethnic minorities
 - o Assist the FHWG with research on identification of best practices,
 - Assist the FHWG to make specific recommendations for zoning and land use regulations.

Discuss what progress has been made toward the achievement of fair housing goals.

Since the implementation of these goals in 2010, the City-Parish has not had the capacity to address these goals and the City-Parish has fallen severely short of meeting previous goals.

Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences.)

The Office of Community Development has had a tumultuous past 10 years with leadership turnover that caused many of the specific fair housing goals from 2010's AI to be unattended to.

Despite the instability at the leadership level, staff was able to make partnerships with developers to create affordable rental units in the jurisdiction. The newly stabilized agency is ready and committed to moving forward with a new set of goals.

HOME funds have been allocated to multiple developments over the past 5 years:

- The Elysian Apartment Homes incorporated 25 total affordable units. Although they are located in a predominantly African American neighborhood, the development is in close proximity to a diverse corridor that is close to downtown and amenities.
- Urban Garden Senior Village is a development that was built in a low- to moderate-income (LMI) census tract in the Legion Village neighborhood, which is 88% African American. The development boasts 10 single-family townhomes that are strictly rented to seniors.
- Between Warren House Apartments and Buffington Heights, 34 affordable units were also constructed in other north Baton Rouge neighborhoods. Both developments are situated in segregated, majority-African-American areas.

The vast majority of subsidized housing in East Baton Rouge Parish has been sited in majority-Black communities on the north side of the city, while most majority White areas are heavily zoned for single-family homes or commercial use. Continuing to make most affordable housing investments in majority-Black areas will likely perpetuate segregation. Without clear goals designed to address this historical imbalance, future HOME allocations are at risk of continuing this trend.

Housing First Alliance of the Capital Area

The Housing First Alliance of the Capital Area (HFACA) was created after the flooding in 2016, when members agreed to address the need for more coordination between housing stakeholders for the purpose of creating more affordable and safe housing for residents. Although the central organizing goal of HFACA is affordable housing, rather than fair housing, some of its members are focused on enhancing homebuyer education activities.

HFACA is working on a Housing Plan that will outline the needs within the jurisdiction for affordable housing and identify the resources that exist that can contribute to this plan. The group also plans to apply for outside funding to begin addressing the housing needs for East Baton Rouge Parish residents. The Housing Plan may also address recommendations for zoning and land use planning cited in the past goals.

Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

This Assessment of Fair Housing will be an excellent opportunity for the City-Parish and Build Baton Rouge (BBR) to demonstrate a renewed commitment to overcoming the legacy of segregation. To begin with, the City-Parish and BBR will expand and enhance stakeholder and community involvement in the planning and implementation of this assessment and any future housing plans. Another important way to improve upon past plans will be to develop specific, measurable, attainable/actionable, relevant/realistic, and timely (SMART) goals and metrics for this plan and then evaluate progress towards the achievement of those goals on a biannual basis.

In addition to these process-oriented actions, the City-Parish and BBR—in concert with EBRPHA—must begin to create some balance in siting affordable housing in the higher-

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opportunity southern portion of the parish, while continuing their efforts to bring non-housing investments, like bus-rapid transit, grocery stores, and other infrastructure and amenities, to the majority-black and low-income northern part of the parish.

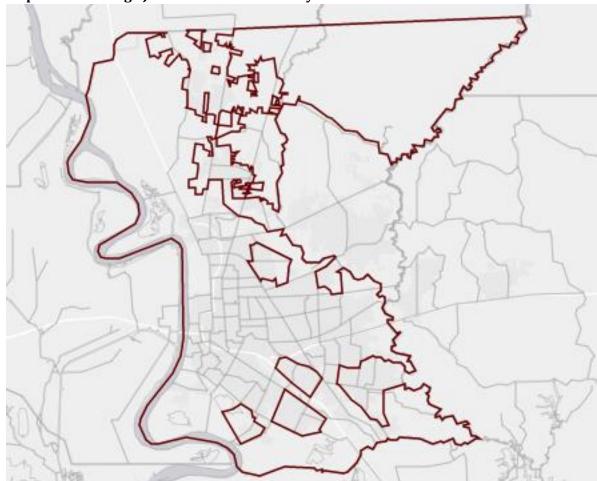
Section V. Fair Housing Analysis

- A. Demographic Summary
- B. General Issues
 - i. Segregation/Integration
 - ii. Racially 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 Analysis

A. Demographic Summary

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. The City of Baton Rouge and unincorporated East Baton Rouge Parish apply as one jurisdiction for HUD community development and housing funds. Demographics for the "Jurisdiction" therefore exclude Central, Baker, Zachary, and a number of other small pockets like the communities of Brownfields, Merrydale, Monticello, and portions of the southern part of the Parish shown in the map below. Where possible, this plan also includes data for East Baton Rouge Parish as a whole, as the area is governed by a consolidated City-Parish government. HUD defines the Region to include the nine parishes of East Baton Rouge, West Baton Rouge, Pointe Coupee, West Feliciana, East Feliciana, St. Helena, Livingston, Ascension, and Iberville.

In addition to capturing current conditions, the data reflects change over time in the nearly three decades since the 1990 Census. The data and analysis in the other sections of this Analysis build upon the foundation laid in this section and, at times, refer back to this section.



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

Race is defined by the Census Bureau as a person's self-identification with one or more social groups. An individual can report as White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race. Survey respondents may report multiple races.

Ethnicity determines whether a person is of Hispanic origin or not. For this reason, ethnicity is broken out in two categories, Hispanic or Latino and Not Hispanic or Latino. Hispanics may report as any race.

In all of the tables, the Race groupings include only those who report that they are NOT of Hispanic origin. Those of Hispanic origin are reported under the Race groupings as Hispanic. Hispanic includes people of any of the races above.

Table 1: Demographic Summary

		, LA CDBG, HOME, ırisdiction	(Baton R	ouge, LA) Region
Race/Ethnicity	#	%	#	%
White, Non- Hispanic	128,512	42.32%	465,308	57.98%
Black, Non- Hispanic	149,040	49.08%	284,561	35.46%
Hispanic	11,852	3.90%	27,357	3.41%
Asian or Pacific Islander, Non- Hispanic	9,928	3.27%	14,400	1.79%
Native American, Non- Hispanic	581	0.19%	1,922	0.24%
Two or More Races, Non- Hispanic	3,311	1.09%	7,978	0.99%
Other, Non- Hispanic	442	0.15%	958	0.12%
National Origin				

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#1 country of origin	Vietnam	2,699	0.95%	Mexico	4,995	0.66%
#2 country of origin	China	1,560	0.55%	Vietnam	3,041	0.40%
#3 country of origin	Mexico	1,426	0.50%	India	2,229	0.30%
#4 country of origin	India	1,203	0.42%	China excl. Hong Kong & Taiwan	2,011	0.27%
#5 country of origin	Honduras	955	0.34%	Honduras	1,550	0.21%
#6 country of origin	El Salvador	619	0.22%	Philippines	947	0.13%
#7 country of origin	Nigeria	511	0.18%	Cuba	946	0.13%
#8 country of origin	Philippines	472	0.17%	El Salvador	913	0.12%
#9 country of origin	Cuba	401	0.14%	Korea	678	0.09%
#10 country of origin	Saudi Arabia	356	0.13%	Nigeria	628	0.08%
Limited English	Proficiency (LEP) Languag	е			
#1 LEP Language	Spanish	3,715	1.31%	Spanish	7,878	1.04%
#2 LEP Language	Vietnamese	2,226	0.78%	Vietnamese	2,544	0.34%
#3 LEP Language	Chinese	1,195	0.42%	Chinese	1,540	0.20%
#4 LEP Language	French	496	0.17%	French	1,192	0.16%
#5 LEP Language	Arabic	279	0.10%	Arabic	379	0.05%
#6 LEP Language	Other Asian Languages	257	0.09%	Other Asian Language	355	0.05%

#7 LEP Language	Other Indic Languages	249	0.09%	Other Indic Language	251	0.03%
#8 LEP	Vanaan	151	0.050/		220	0.020/
Language	Korean	151	0.05%	Korean	239	0.03%
#9 LEP Language	Hindi	130	0.05%	Gujarati	192	0.03%
#10 LEP Language	Persian	100	0.04%	Hindi	191	0.03%
Disability Type						
Hearing difficulty	8,838	3.	15%		27,635	3.74%
Vision difficulty	8,004	2.	85%		20,973	2.84%
Cognitive difficulty	15,156	5.	40%		41,626	5.64%
Ambulatory difficulty	21,273	7	58%	56,630		7.67%
Self-care	21,273	7.	30 70	30,030		7.07 /0
difficulty	8,160	2.	91%	21,563		2.92%
Independent living difficulty	14,503	5.	17%		36,445	4.94%
Sex						
Male	145,996	48	.08%	394,256		49.13%
Female	157,670	51	.92%	408,228 50		50.87%
Age						
Under 18	69,098	22.7	75%	198,327		24.71%

18-64	201,133	66.23%	518,005	64.55%
65+	33,435	11.01%	86,152	10.74%
Family Type				
Families with children	30,426	43.28%	90,648	44.94%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details

(www.hudexchange.info/resource/4848/affh-data-documentation).

Table 2: Demographic Trends, Baton Rouge, Louisiana CDBG, HOME, ESG								
	1990 7	rend	2000 7	rend	2010 7	rend	Curr	ent
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hisp.	157,189	57.05%	141,861	49.46%	128,512	42.32%	128,512	42.32%
Black, Non-Hisp.	109,154	39.61%	130,221	45.41%	150,970	49.72%	149,040	49.08%
Hispanic	4,251	1.54%	5,342	1.86%	11,852	3.90%	11,852	3.90%
Asian/Pacific Island, Non- Hisp.	4,240	1.54%	7,619	2.66%	10,746	3.54%	9,928	3.27%
Native American, Non- Hisp.	363	0.13%	939	0.33%	1,051	0.35%	581	0.19%
National Origin	National Origin							
Foreign-born	7,749	2.81%	11,992	4.18%	16,270	5.36%	16,844	5.55%
LEP								

Limited English Proficiency	5,898	2.14%	8,152	2.84%	9,870	3.25%	9,419	3.10%
Sex								
Male	131,366	47.63%	137,118	47.81%	145,996	48.08%	145,996	48.08%
Female	144,415	52.37%	149,668	52.19%	157,670	51.92%	157,670	51.92%
Age								
Under 18	71,705	26.00%	74,055	25.82%	69,098	22.75%	69,098	22.75%
18-64	175,477	63.63%	181,819	63.40%	201,133	66.23%	201,133	66.23%
65+	28,598	10.37%	30,912	10.78%	33,435	11.01%	33,435	11.01%
Family Type								
Families with children	34,141	50.31%	29,389	48.66%	30,426	43.28%	30,426	43.28%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: Data Sources: Decennial Census; ACS. Note 3: Refer to the Data Documentation for details www.hudexchange.info/resource/4848/affh-data-documentation

Table 3: City of Baton Rouge and East Baton Rouge Parish Race and Ethnicity Demographics, 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge City	East Baton Rouge Parish
Total Population	227,549	446,167
White, Non-Hispanic %	36.6%	45.2%
Black, Non-Hispanic %	54.7%	45.6%
Hispanic %	3.4%	4.0%
Asian or Pacific Islander, Non-	3.6%	3.4%
Hispanic %		
Native American, Non-	0.2%	0.1%
Hispanic %		
Two or More Races, Non-	1.3%	1.5%
Hispanic %		
Other, Non-Hispanic %	0.2%	0.2%

Race/Ethnicity

The HUD Jurisdiction of Baton Rouge, Louisiana is slightly more Black (49.08%) than the Parish, which is only 45.6% Black. At the same time, the City of Baton Rouge, all of which is included in the HUD Jurisdiction is majority Black (54.67%). In the HUD Jurisdiction, White, Non-Hispanic residents make up 42.32% of residents. There are smaller populations of Hispanic, Asian/Pacific Islander or Native American residents in the Jurisdiction, at 3.90%, 3.27%, and 0.19% populations respectively. Residents that are Two or More races or Other make up 1.09% and 0.15% of the

population. Overall, the city, the HUD Jurisdiction, and the parish are more diverse than the broader region.

Over time, the HUD jurisdiction's demographics and, to a lesser extent, those of the region have changed significantly. Since 1990, the percentage of the population that are Black, Hispanic, and Asian or Pacific Islander have increased while the percentage of the population that is White has decreased. In the HUD jurisdiction, White population, in absolute rather than percentage terms, has decreased, as well, though in the broader region White population has just grown more slowly than that of other groups. In particular, northern and eastern portions of East Baton Rouge Parish that are within the HUD Jurisdiction have experienced patterns of White Flight.

National Origin

The ten most common countries of origin for foreign-born residents in the Jurisdiction are Vietnam at 0.89% of the population, China at 0.69%, Mexico at 0.55%, India at 0.32%, Honduras at 0.28%, Saudi Arabia at 0.21%, Guatemala at 0.18%, Philippines at 0.16%, El Salvador at 0.16% and Cuba at 0.11%. The number of foreign-born residents in the Jurisdiction increased somewhat since 1990, from 2.81% in 1990 to 5.5% currently.

Table 4: City of Baton Rouge and East Baton Rouge Parish National Origin Demographics, 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge City	East Baton Rouge Parish
Total Population	227,549	446,167
China	1,576	2,342
India	723	2,179
Vietnam	2,022	3,522
Mexico	1,258	2,818
Honduras	632	1,988

Limited English Proficiency

The Limited English Proficiency (LEP) population in the HUD Jurisdiction increased between 1990 and 2010, but is currently lower than it was in 2010, at 3.10%. The most represented LEP language in the Jurisdiction is Spanish at 1.31% of the population, whereas at the Parish level, Spanish speakers with LEP make up a slightly higher percentage of the population at 1.6%.¹ Vietnamese, Chinese, French, and Arabic all represent LEP languages spoken by at least 0.1% of the population, while Other Asian Languages, Other Indic Languages, Korean, Hindi, and Persian are languages spoken by LEP individuals comprising less than 0.1% of the population.

Disability

The most commonly occurring disabilities in the Jurisdiction are ambulatory difficulties, with 7.58% of the population having such a disability. Next are cognitive difficulties at 5.40%,

¹ Language Spoken at Home for the Population 5 Years and Over, ACS 2017, 5-year Estimates

independent living difficulties at 5.17%, hearing difficulties at 3.15%, self-care difficulties at 2.91%, and vision disabilities at 2.85%. In East Baton Rouge Parish, the percentages are similar, but all slightly lower.² The region has a similar makeup.

Sex

In the Jurisdiction of Baton Rouge, 145,996 males and 157,670 females make up the population, at 48.08% and 51.92% respectively. This has not changed significantly since 1990. With 52.02% women, the parish has a slightly higher share of men.³

Age

Baton Rouge has 69,098, or 22.75% of residents under the age of 18, 201,133, or 66.23% of residents from the ages of 18-64, and 33,435, or 11.01% of residents aged 65 and over. At the Parish level, the only meaningful difference is that there are slightly more older residents, with 12.80% over the age of 65.4 This has not changed meaningfully since 1990.

Familial Status

The percentage of family households comprised of families with children in Baton Rouge has decreased somewhat since 1990, from 50.31% of family households in 1990 to 43.28% of family households currently.

² Types of Disabilities, ACS 2017, 1-year Estimates

³ Age and Sex, ACS 2017, 5-year Estimates

⁴ Age and Sex, ACS 2017, 5-year Estimates

B. General Issues

i. Segregation/Integration

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

HUD's AFFH Data & Mapping Tool provides Dissimilarity Index data for East Baton Rouge Parish and the Region. The Dissimilarity Index is a measure that social scientists use to assess the level of residential racial or ethnic segregation within a geographic area. The index reflects the percentage of people of a certain group, such as African-Americans, who would have to move to a different census tract in order to be evenly distributed throughout the city or region in relation to another group, such as Non-Hispanic Whites. Values from 0 to 39 indicate low segregation, values from 40 to 54 indicate moderate segregation, and values from 55 to 100 indicate high segregation

East Baton Rouge Parish

In East Baton Rouge, the White and Black populations experienced high segregation with scores above 55 in 1990, 2000, 2010, and the most current data received. The Asian and Hispanic populations experienced low to moderate levels of segregation throughout the time period 1990–current.

Table 5: Racial/Ethnic Dissimilarity Trends, Baton Rouge Jurisdiction

	(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	
Non-White/White	63.94	60.42	54.62	61.05	
Black/White	68.45	65.22	59.75	66.50	
Hispanic/White	22.68	26.52	38.82	42.50	
Asian or Pacific Islander/White	42.87	36.21	33.76	38.79	

In the Baton Rouge Region, the White and Black populations experienced high segregation with scores above 55 in 1990, 2000, 2010, and currently. The Hispanic population experienced low segregation and the Asian population continues to experience moderate segregation.

Table 6: Racial/Ethnic Dissimilarity Trends, Baton Rouge Region

	(Baton Rouge, LA) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	55.72	55.59	51.91	57.70
Black/White	59.27	59.99	57.15	63.08
Hispanic/White	25.96	30.16	32.73	37.64
Asian or Pacific Islander/White	53.21	52.26	48.01	53.98

Explain how these segregation levels have changed over time since 1990.

Baton Rouge Jurisdiction

Segregation between non-White and White populations overall has been high in the Jurisdiction since 1990. Black/White segregation decreased from 1990 to 2010, but has nearly returned to

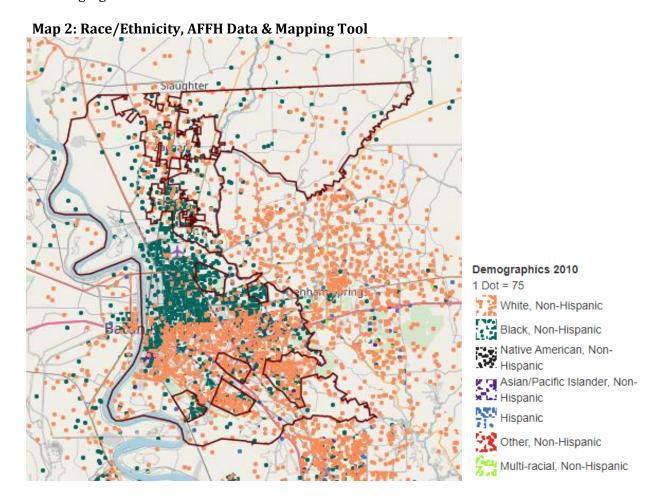
1990 levels with a current score of 66.50. The Hispanic population was experiencing low segregation from 1990 through the early 2000's, but the score has continuously increased and currently reflects moderate levels of segregation. Segregation levels for the Asian population has fluctuated since 1990, but is currently approaching moderate levels.

Greater Baton Rouge Region

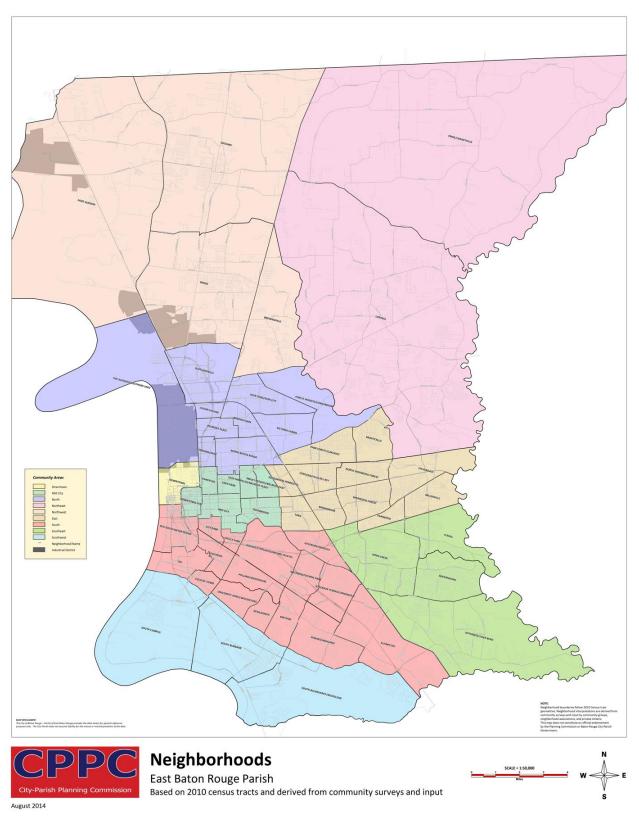
Segregation between non-White and White populations overall has been high with a dip to moderate in 2010 and a return to a high score of 57. Segregation in the region between Blacks and Whites has increased from 59 in 1990 to 63 today. The Hispanic population has experienced low segregation, but the scores have increased over time and are approaching a more moderate level. The Asian population has had a moderate score that has been approaching high levels since 1990.

Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Based on the Race/Ethnicity map from the AFFH Data & Mapping Tool and the East Baton Rouge Parish Neighborhood Map, the following neighborhoods demonstrate disproportionately high or low levels of segregation.



Map 3: East Baton Rouge Parish Neighborhoods Map



Segregated Areas

- Legion Village is highly segregated with majority Black residents.
- Brookstown is highly segregated with majority Black residents.
- Delmont Place is highly segregated with majority Black residents.
- Istrouma is highly segregated with majority Black residents.
- North Baton Rouge is highly segregated with majority Black residents.
- Fairfields is highly segregated with majority Black residents.
- Eden Park is highly segregated with majority Black residents.
- Goodwood Homesites is highly segregated with majority Black residents.
- Melrose Place is highly segregated with majority Black residents.
- Smiley Heights is highly segregated with majority Black residents.
- Southern University is highly segregated with majority Black residents.
- Scotlandville is highly segregated with majority Black residents.
- Glen Oaks/Zion City is highly segregated with majority Black residents.
- Forest Heights is highly segregated with majority Black residents.
- Victoria Farms is highly segregated with majority Black residents.
- Park Forest/Oak Crest is highly segregated with majority Black residents.
- Monticello is highly segregated with majority Black residents.
- Baker is highly segregated with majority Black residents.
- Downtown East is highly segregated with majority Black residents.
- The eastern section in Mid City is highly segregated with majority White residents.
- Goodwood is highly segregated with majority White residents.
- Tara is highly segregated with majority White residents.
- City Park is highly segregated with majority White residents.
- Southside is highly segregated with majority White residents.
- Pollard/Woodchase is highly segregated with majority White residents.
- Bocage is highly segregated with majority White residents.
- Jefferson/Drusilla is highly segregated with majority White residents.
- Westminster/Pine Park is highly segregated with majority White residents.
- Jefferson Terrace is highly segregated with majority White residents.
- Jones Creek is highly segregated with majority White residents.
- Perkins/Highland is highly segregated with majority White residents.
- South Campus is highly segregated with majority White residents.
- South Bluebonnet is highly segregated with majority White residents.
- Central is highly segregated with majority White residents.
- Shenandoah is highly segregated with majority White residents.
- Jefferson/Tigerbend is highly segregated with majority White residents.
- Collegetown is highly segregated with majority White residents.
- University Acres is highly segregated with majority White residents.
- Kenilworth is highly segregated with majority White residents.

Integrated Areas

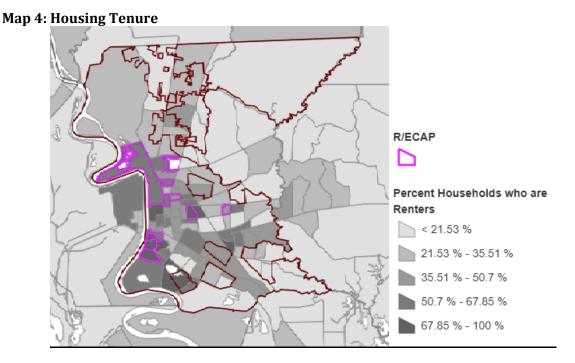
- The western portion of Mid City is integrated with Black and White residents.
- Old South Baton Rouge is moderately integrated Black and White residents. It is also a R/ECAP.
- Valleypark is integrated with Black and White residents.

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- The R/ECAP section of LSU is integrated with 54% White households, 30% Asian households, and 9% Black households.
- North Sherwood Forest is integrated with Black and White residents.
- Fairwood is integrated with Black and White residents.
- The western portion of Jones Creek is integrated with Black and White residents.
- Mayfair is integrated with Black and White residents.
- South Burbank is integrated with Black and White residents.
- The R/ECAP zone of South Campus is integrated with 25% Black households, 54% White households, 10% Asian households and 9% Hispanic households.
- Stevendale is integrated with Black and White residents.
- O'Neal is integrated with Black and White residents.
- The eastern section of Zachary is integrated with Black and White residents.
- Port Hudson is integrated with Black and White residents.
- Downtown Baton Rouge is integrated with Black and White residents.

Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

The following information is based on HUD's AFFH Housing Tenure map and supplemented with ACS data from 2017. Overall, rental housing is concentrated on LSU's campus and near R/ECAP zones, which are largely in the northern, majority Black neighborhoods.



Homeowners in East Baton Rouge Parish are concentrated in the City of Central, the southeast portion of the parish where the neighborhoods are majority White, and in the White neighborhoods just south of Florida Blvd (Tara, Broadmoor, and Sherwood Forest), which divides the city's Black and White populations.

Based on the HUD Data and Mapping Tool's Table: Homeownership and Rental Rates by Race/Ethnicity, the majority of homeowners in the Jurisdiction of Baton Rouge are White with 36,775 total White owner-occupied households. Black homeowners make up close to 37% of owner-occupied homes in the jurisdiction. Hispanic and Asian homeowners each make up between 2% and 3% of owner-occupied households, respectively.

Black households comprise the majority of renter-occupied homes in the jurisdiction, while White families are 35% of the renter population there. Hispanic and Asian households together comprise less than 8% of the renter population in the jurisdiction. While 58% of homeowners are White families, 56% of renters are Black families.

Table 7: Homeownership and Rental Rates by Race/Ethnicity

	(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction			
	Homeowners		Renters	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	36,775	57.55%	18,250	35.08%
Black, Non-Hispanic	23,465	36.72%	28,875	55.50%
Hispanic	1,380	2.16%	2,005	3.85%
Asian or Pacific Islander, Non-Hispanic	1,669	2.61%	1,845	3.55%
Native American, Non-Hispanic	49	0.08%	124	0.24%
Other, Non-Hispanic	560	0.88%	910	1.75%
Total Household Units	63,905		52,030	-

The following neighborhood housing tenure specifications are based on 2017 American Community Survey, 5 year estimates.

Neighborhoods with High African American Homeownership Rates

Monticello has the highest rate of Black homeownership in East Baton Rouge Parish. The neighborhood has an 84% Black population and 71% of all households there are occupied by Black homeowners.

North Baton Rouge has the next highest rate of Black homeownership. The neighborhood has a 96% Black population rate and 60% of all households there are occupied by Black homeowners.

Park Forest/Oak Crest has an 85% Black population and 55% of all households in Park Forest/Oak Crest are occupied by Black homeowners.

Glen Oaks/Zion City has a 94% Black population and roughly 54% of all households there are occupied by Black homeowners.

Fairfields is situated east of downtown Baton Rouge and north of Mid City. The neighborhood has a 96% Black population with 53% of all households are owned by Black residents.

Brownfields shares a border with the city of Central and has a 67% Black population rate. Roughly 53% of all households in Brownsfields are owned by Black residents there.

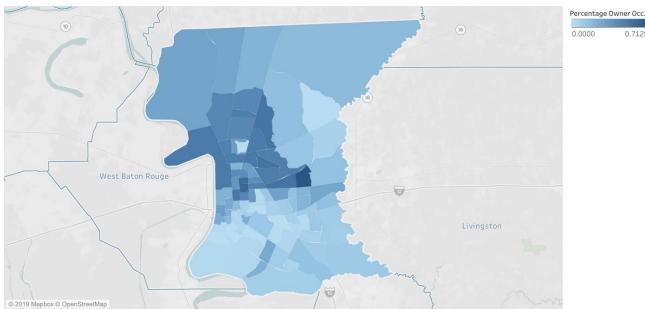
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Southern University is a Historically Black College located in the northwest part of Baton Rouge. The neighborhood has a 99% Black population rate and 51% of the residents there are homeowners.

Black homeownership rates are highest in Monticello, a neighborhood on the outskirts of the city's urban core that shares a border with the city of Central. North Baton Rouge and Southern University are home to predominantly Black neighborhoods, but also boast higher rates of Black homeownership. The majority of the neighborhoods with high Black homeownership rates are in the north side of the parish, where African American households are concentrated.

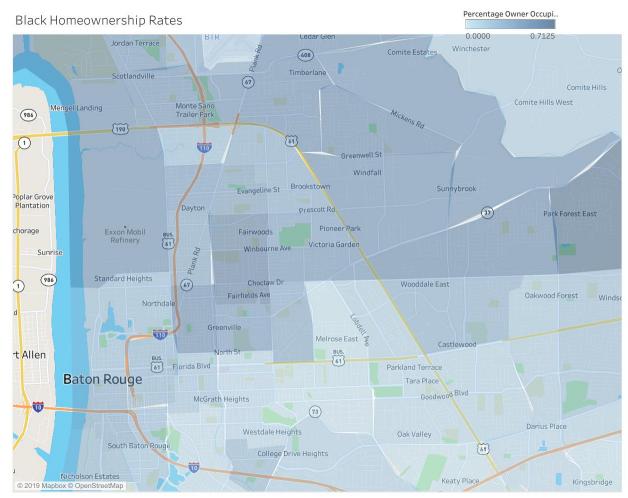
Map 5: Black Homeownership Rates, East Baton Rouge Parish





Map 6: Black Homeownership Rates, Monticello





Map 7: Black Homeownership Rates, North Baton Rouge

Neighborhoods with High African American Renter Rates

Smiley Heights has the highest overall rental rate for African Americans in the city-parish. The neighborhood is located just northeast of Mid City and just south of North Baton Rouge. This area between North Baton Rouge and Florida Boulevard has an 83% Black population rate and African Americans comprise 81% of the renters there. This neighborhood and the adjoining East Fairfield/Melrose Place currently include the Ardenwood Village public housing development that is slated for redevelopment as part of a \$30 million HUD Choice Neighborhoods Initiative grant.

Goodwood Homesites, located just east of Smiley Heights and north of Florida Boulevard also has an 80% Black population and 69% of all renters there are Black.

Scotlandville also has a large Black population. The specific census tract that surrounds the Baton Rouge Metropolitan Airport has a 100% Black population rate and 67% renter rate.

Other neighborhoods on the north side of Baton Rouge that have high Black renter rates include Legion Village (67%), Istrouma/Dixie (62%) and Brookstown (59%). They all have very high Black population rates between 90%-98%.

Map 8: Black Renter Rates, Smiley Heights

Map 9: Black Renter Rates, Scotlandville and North Baton Rouge



Neighborhoods with High White Homeownership Rates

Shenandoah has the highest rate of White homeownership in East Baton Rouge Parish. The neighborhood is 85% White and 78% of all residents there are White homeowners.

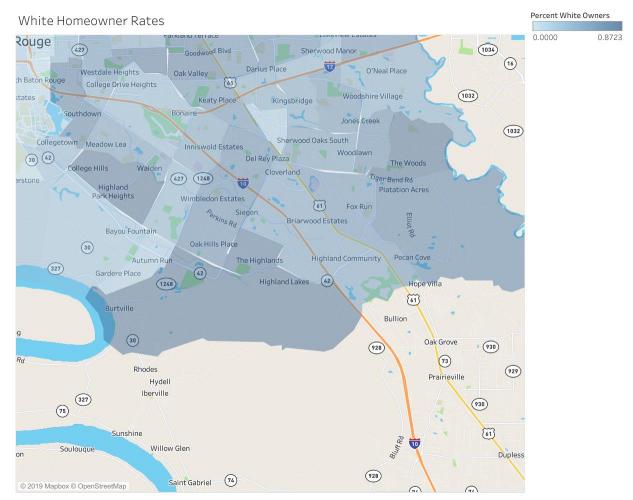
South Bluebonnet/Nicholson has the next highest White homeownership rates. 84% of residents there are White, and White homeowners comprise 74% of the overall population.

Kenilworth is 87% White with 76% White homeowner rate. Perkins Highland is 85% White, and the White homeowner rate is 75%. University Acres/Woodstone has a 91% White population rate and 74% White homeowner rate.

White homeowner rates are highest in the southern section of East Baton Rouge. These neighborhoods are all far from downtown and highly segregated from African Americans. They are located in close proximity to US Interstate 10, which provides convenient access to downtown, as well as to Gonzales and other towns in Ascension Parish.

Percent White Owners White Homeowner Rates 0.0000 0.8723 Slaughter 16 New Roads Zachary Baker 90} BTR Livingston Denham Walker T **Baton Rouge** Rosedale Brush French Plaquemine © 2019 Mapbox © OpenStreetMap

Map 10: White Homeownership, East Baton Rouge Parish



Map 11: White Homeownership Southeast Baton Rouge

Neighborhoods with High White Renter Rates

South Campus has a 65% White population and 51% of all households there are White renters. Collegetown has an 88% White population and 59% of all households there are White renters. Louisiana State University (LSU) has a 60% White population and White renters comprise roughly 56% of all households at LSU.

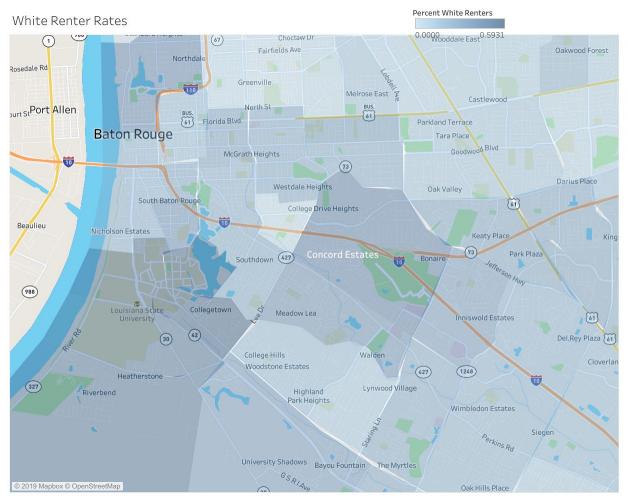
Bocage/Concord Estates has the next highest rate of White renters in East Baton Rouge. The neighborhood has a 72% White population rate and White renters make up only 44% of all households there.

Downtown Baton Rouge is 46% White, and only 41% of households there are White renters.

Across south Baton Rouge, White residents in neighborhoods that are majority White are roughly two to three times more likely to be homeowners than renters. The only area where White renter rates are high are on LSU campus, where there are more than 31,000 students enrolled there. Outside of LSU, there is no residential neighborhood in Baton Rouge where Whites are majority renters.

Black residents in majority Black neighborhoods are less likely to be homeowners than White residents in majority White neighborhoods. The higher population of white renter residents near the LSU campus is accounted for by the majority White attendance and tenure of college students and professors at the school. The southwest region of Baton Rouge is more diverse than the rest of the city-parish, yet White renters still constitute the majority of its population.

Map 11: White Renters, Downtown, Mid City, LSU



Neighborhood Name JEFFERSON / SOUTH SOUTH UNIVERSITY PERKINS / COLLEGE TOWN TIGER BEND JONES CREEK HIGHLAND SHENANDOAH BLUEBONNET CAMPUS ACRES / WOO. 22k Measure Names Total Households White OwnerOccupied ■ White RenterOccupied 18K 16K 14K 12K 10K 81 4K 2 K

Table 8: White Houseing Tenure by NeighborhoodWhite Housing Tenure by Neighborhood

Neighborhoods with Asian Residents

The Asian population represents a minority in the Parish and the Jurisdiction. Asian homeowners are concentrated in majority white neighborhoods, while Asian renters are concentrated on LSU's campus.

Jones Creek, a majority White neighborhood with moderately high rates of White homeownership, has only 614 Asian owner-occupied households, or a 6% Asian population rate. Asian homeowners in this neighborhood are 5% of the population there. South Bluebonnet has a 7% Asian population rate and a 6% Asian homeowner rate. Millerville has a 6% Asian population rate and a 6% Asian homeowner rate. Asian residents in majority white neighborhoods are more likely to own their homes than any other ethnic group there.

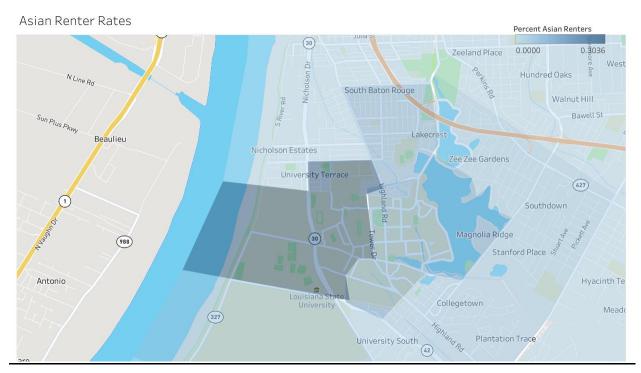
There are less than 1,000 Asian households that rent within LSU's boundaries, and less than 400 Asian households that rent in Old South Baton Rouge. All Asian residents in these neighborhoods are listed as renters, while almost every Asian resident in Jones Creek, South Bluebonnet, and Millerville are homeowners. The data shows that almost all Asian residents who become homeowners in Baton Rouge have attended and completed college.

Percent Asian Owners Asian Homeowner Rates 0.05959 (300 Rushmore Wooddale East [190] (426) Melrose East Castlewood BUS. Centurion Place Parkland Terrace Lakeview Estates 73 T arius Place O'Neal Place Oak Valley [61] (1032) Woodshire Village

Sherwood Oaks South

Map 12: Asian Homeowner Rates, East Baton Rouge Parish

Map 13: Asian Renter Rates, LSU



Neighborhoods with Hispanic Residents

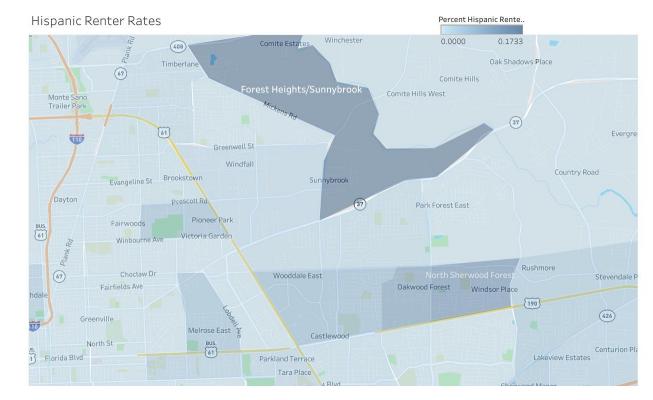
Hispanics also represent a numerical minority in Baton Rouge. They rent heavily in LSU's boundaries, and also own homes in majority White neighborhoods. There are a moderate amount of Hispanic homeowners in Baker and Central, which border neighborhoods in the northern section of Baton Rouge. Hispanic homeowners tend to live in majority White neighborhoods.

Hispanics comprise 7% of the population in Shenandoah, roughly 205 households. All 205 Hispanic households in Shenandoah are listed as owner occupied. Stevendale, a neighborhood west of Denham Springs and south of Central, has a 9% Hispanic population rate and 5% of the residents there are Hispanic homeowners.

Hispanic renters largely rent near LSU in South Burbank, where they comprise 12% of the population. Every Hispanic household in South Burbank is listed as renter-occupied. Other neighborhoods with high Hispanic renter rates are Forest Heights and North Sherwood Forest. Both neighborhoods are situated north of Florida Boulevard in predominantly Black neighborhoods.

Hispanic Homeowner Rates Percent Hispanic Owners 0.00000 0.06680 (3002) Rushmore Wooddale East Stevendale Park (16) Oakwood Forest Windsor Place [190] Castlewood dand Terrace Tara Place Goodwood Blvd (1034) T O'Neal Place Dak Valley (1032) Woodshire Village Kingsbridge Keaty Place Park Plaza Jones Creek 1032 Sherwood Oaks South nniswold Estates Woodlawn Del Rey Plaza (1248) Platation Acres

Map 13: Hispanic Homeownership Rates, Shenandoah and Stevendale



Map 14: Hispanic Renter Rates, Forest Heights/Sunnybrook and North Sherwood Forest

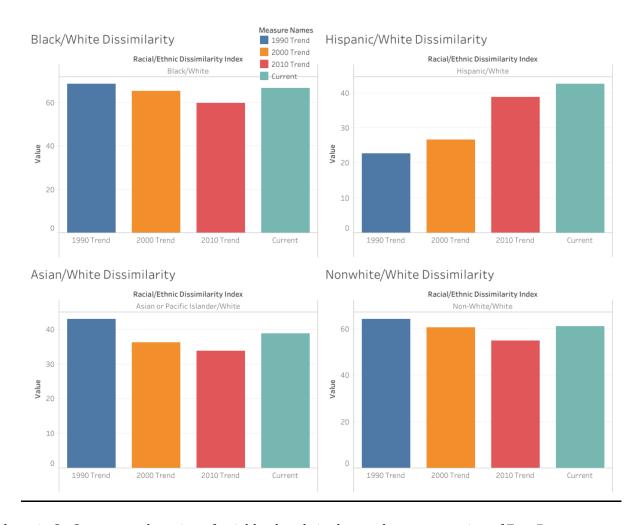
Discuss how patterns of segregation have changed over time (since 1990). The following information is based on data from Table 5.

In 1990, the Black/White dissimilarity index was 68.45, which denotes high segregation. The index decreased by almost 10 points to land at 59.75 in 2010, but it has rebounded to 66.50 and is currently approaching 1990 levels.

The Asian population has also experienced a slight decrease in segregation levels since 1990 when the index was 42.87, which denotes moderate segregation. By 2010 the index was at a low of 33.76, but it's currently at 38.79, and is approaching 1990 levels.

Hispanics have experienced uninterrupted increasing levels of segregation since 1990. The dissimilarity index for Hispanic/White was 22.68 in 1990. In 2000 it increased to 26.52 and shot up more than 12 points to 38.82 by 2010. Hispanics are currently experiencing the highest levels of segregation recorded to date by their community at 42.50.

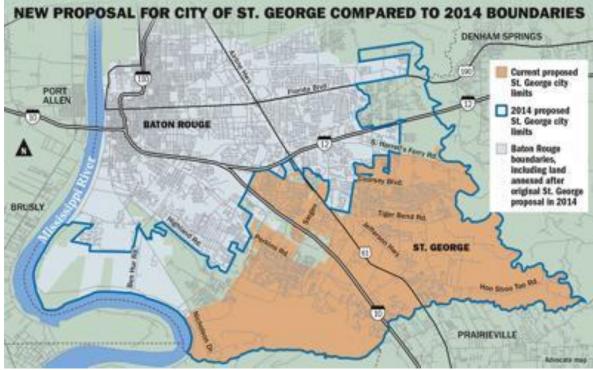
The overall dissimilarity index for non-White/White groups has decreased by almost three points. However, by 2010 it had decreased by almost 10 points and dramatically reversed that trend.



Residents in St. George, a subsection of neighborhoods in the southeastern portion of East Baton Rouge Parish that is made up of multiple majority-white neighborhoods, began organizing to legally incorporate and secede from the city-parish in 2014. The first petition failed to garner enough signatures, but in 2019 the issue was put on the ballot and passed 54% to 46%. The proposed St. George city includes Shenandoah, South Bluebonnet, Jefferson/Tigerbend, and other adjacent majority White neighborhoods. If incorporation is successful, the city will be 77% White and 12.5% African American, whereas the city-parish is 45.6% Black and 45.2% White.

The original 2015 boundaries for St. George created a city that would have been 20% African American, based on voter registration records.⁵ The new boundaries eliminated dozens of apartment complexes and reduced the population by tens of thousands of people. Since 2016, nearly half of all housing discrimination cases that were filed in East Baton Rouge Parish with HUD or the State Attorney General's Office originated in the zip codes that encompass neighborhoods within St. George's designated boundaries (70817, 70816, 70809, 70810).

⁵ http://www.onebtr.com/faqs.php



Map 15: Proposed City of St. George Boundaries

St. George's proposed city limits include the area shaded in orange - that area is currently the unincorporated southern part of East Baton Rouge Parish.

Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

There are factors affecting both the rental and sales market that currently make home-ownership for African Americans and affordable housing development in low-poverty neighborhoods difficult to achieve. After the Flood of 2016, flood insurance requirements in Baton Rouge have changed. Property owners who were not required to have flood insurance in the past will now have a premium that is tied to their level of flood risk. This added cost of ownership may disproportionately hinder African American families from achieving homeownership and cause them to keep renting in highly segregated neighborhoods.

Flood zones and wetlands also impact the development of affordable housing in higher opportunity neighborhoods in East Baton Rouge Parish. The Office of Community Development has had difficulty getting zoning approval for affordable housing developments in the southern section of Baton Rouge due to concerns of flooding. According to LA Floodmaps, ground elevation levels are generally lower in the southern, majority white neighborhoods than they are in the majority-black parts of northern Baton Rouge.⁶ If initiatives are not taken to build affordable housing with adequate flood aversion engineering in the south, environmental factors will continue to discourage needed development and perpetuate segregation in Baton Rouge.

⁶ http://maps.lsuagcenter.com/floodmaps/

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In addition, if St. George successfully incorporates, it will become Louisiana's fifth largest city and include a new school district serving an overwhelmingly White student body in a parish that is majority Black. St. George's success may spur additional secession attempts in East Baton Rouge Parish or other parishes that have the effect of hardening residential and school segregation patterns.

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

The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

The East Baton Rouge Parish Housing Authority recently received a Choice Neighborhood Initiative Award grant to re-develop Ardenwood Village, a distressed area in the central region of Baton Rouge that includes the predominantly Black neighborhoods Smiley Heights, East Fairfields, and Melrose East.⁷ The funding will be used to revitalize the area by including a YWCA, a new mixed income housing community, educational programs, beautification, and other necessary improvements to the area. The initiative won't necessarily foster integration, but it will help bring vital resources to very segregated neighborhoods on the north side of the Parish, as well as increase the quality of life for residents there.

BUILD Baton Rouge also recently unveiled a comprehensive redevelopment plan for the Plank Road Corridor.⁸ The plans include a new bus rapid transit (BRT) service to make it easier for residents in the northern section of the parish to travel south for employment and other opportunities. The development will include a food hub, civic center, childhood learning facilities, affordable housing, a charity thrift store, high-frequency public transit, and an eco-park. The transit-oriented development along the historic corridor will help foster investment in neglected neighborhoods while facilitating access to high opportunity areas for Black residents.

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⁷ https://www.wafb.com/2019/05/10/baton-rouge-awarded-m-hud-neighborhood-grant-revitalize-community/

⁸ https://studio-zewde.com/plank-road-corridor

B. General Issues

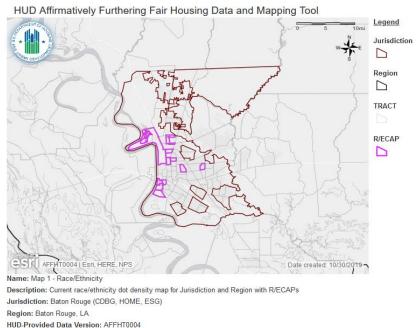
ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are geographic areas with significant concentrations of poverty and non-White populations. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50% or more. With regards to poverty, R/ECAPs are census tracts in which 40% or more of individuals are living at or below the poverty line or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower. In Baton Rouge, the former threshold applies.

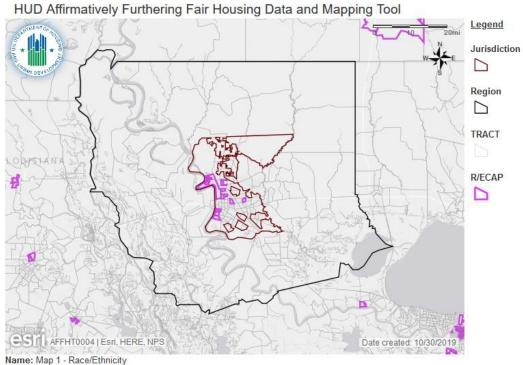
Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs facilitates understanding of entrenched patterns of segregation and poverty.

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

Map 16: R/ECAPs, Baton Rouge Jurisdiction



Map 17: R/ECAPs, Baton Rouge Region



Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

There are currently 11 census tracts in Baton Rouge that are R/ECAPs. These R/ECAPs are found along the Mississippi River, by the Baton Rouge Metropolitan Airport, and other areas north of Florida Blvd. The first R/ECAP is located directly along the Mississippi River, stretching from the Devils Swamp to Chippewa St. This area includes Southern University and A&M College and a few different railway lines. It is relatively less populated, but has a high concentration of Black residents. To its east, another R/ECAP borders the Baton Rouge Metropolitan Airport. Both of these R/ECAPs may be classified as such because of the effects of these features on the areas. A third R/ECAP is located at the intersection of the Great River Road and Airline Highway, in a similarly less populated area. Further south, two R/ECAPs are found in relatively residential areas in the Istrouma neighborhood. Moving east, one R/ECAP surrounds Melrose Canal and includes the Bon Carie Mall, and the easternmost R/ECAP is another more residential area by Red Oak and Forest Oaks. The last four R/ECAPs are located in the south of the City, along the Mississippi River and immediately south of the Garden District. Two of these R/ECAPs overlap with the campus for the Louisiana School for the Deaf.

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?

Table 9: R/ECAP Demographics, Baton Rouge, Louisiana Jurisdiction and Region

	(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction			(Baton Rouge	(Baton Rouge, LA) Region			
R/ECAP Race/Ethnicity	#	%		#	#		%	
Total Population in R/ECAPs	38,187	-		38,187	38,187		-	
White, Non- Hispanic	7,045	18.45%	6	7,045		18.45	%	
Black, Non- Hispanic	26,999	70.70%	6	26,999	26,999		70.70%	
Hispanic	1,583	4.15%		1,583	1,583		4.15%	
Asian or Pacific Islander, Non- Hispanic	2,009	5.26%		2,009	2,009		5.26%	
Native American, Non- Hispanic	66	0.17%		66		0.17%		
Other, Non- Hispanic	44	0.12%		44		0.12%)	
R/ECAP Family	Гуре							
Total Families in R/ECAPs	6,863 -			6,863		-		
Families with children	3,168 46.16		% 3,168		46.160	%		
R/ECAP Nationa	l Origin							
Total Population in R/ECAPs	38,187	-		38,187		-		
#1 country of origin	China excl. Hong Kong & Taiwan	845	2.21%	China excl. Hong Kong & Taiwan	845	1	2.21%	

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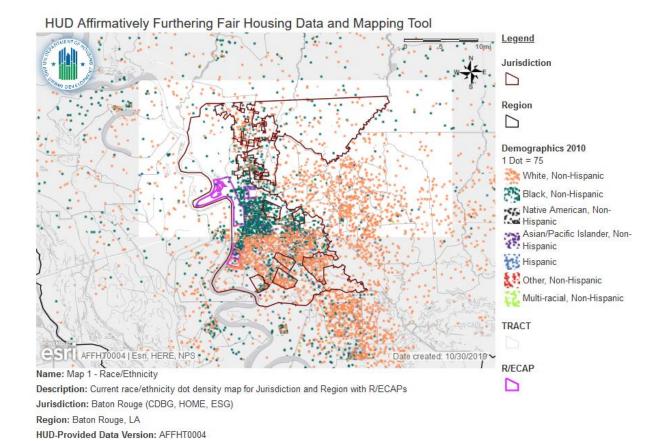
#2 country of origin	India	361	0.95%	India	361	0.95%
#3 country of origin	Mexico	226	0.59%	Mexico	226	0.59%
#4 country of origin	Honduras	132	0.35%	Honduras	132	0.35%
#5 country of origin	Nepal	129	0.34%	Nepal	129	0.34%
#6 country of origin	Sri Lanka	108	0.28%	Sri Lanka	108	0.28%
#7 country of origin	Korea	97	0.25%	Korea	97	0.25%
#8 country of origin	Sierra Leone	89	0.23%	Sierra Leone	89	0.23%
#9 country of origin	Iran	81	0.21%	Iran	81	0.21%
#10 country of origin	Nigeria	69	0.18%	Nigeria	69	0.18%

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

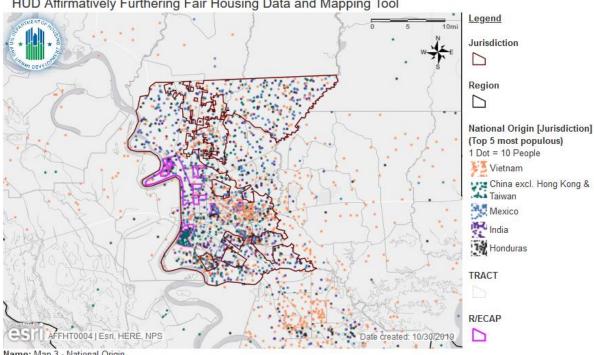
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation)

Map 18: R/ECAPs in Baton Rouge with Race/Ethnicity



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Map 19: R/ECAPs in Baton Rouge with National Origin



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

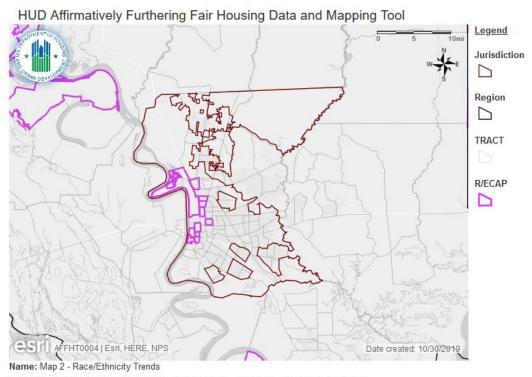
HUD-Provided Data Version: AFFHT0004

Demographics for R/ECAPs are identical in the jurisdiction and the region since there are no R/ECAPs located in the larger region. Black, Non-Hispanic residents make up the majority of the R/ECAP populations in the jurisdiction, at 70.70% of R/ECAP populations. This is compared to 54.67% of residents being Black in the jurisdiction as a whole. Since Black residents are a majority population in the jurisdiction, census tracts that reflect the average makeup of the city may automatically be considered R/ECAPs. However, it is clear that Black residents are disproportionately represented in these tracts. Hispanic or Asian residents are slightly more represented in these tracts when compared to the jurisdiction's demographics, but the concentration of White residents is disproportionately low.

There are slightly lower concentrations of families in R/ECAPs than in the jurisdiction's population, at 46.16% rather than 53.55%. One stark difference is seen in comparing the national origins for the foreign-born populations for the R/ECAPs and the jurisdiction. Although the largest national origin for the foreign-born population is Vietnam, this is not represented in the R/ECAP population at all as reflected in Table 1. R/ECAPs in the northeast of the city have fewer foreign-born residents, while the area by the Louisiana School for the Deaf has disproportionately high numbers of Honduran or Chinese residents. Indian, Vietnamese, and Mexican residents are less represented within these tracts.

Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Map 20: R/ECAPs in 1990, Baton Rouge

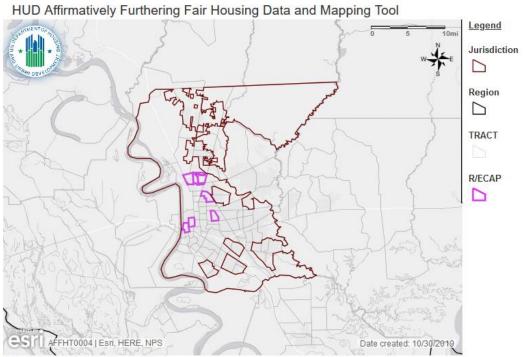


Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

Map 21: R/ECAPs in 2000, Baton Rouge



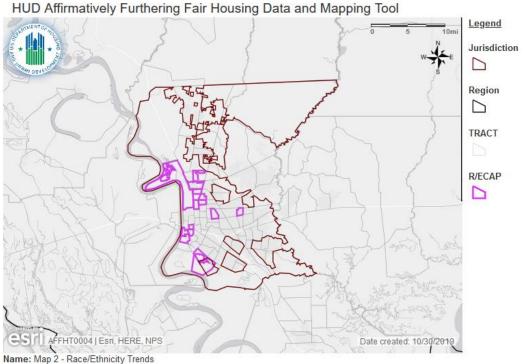
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

Map 22: R/ECAPs in 2010, Baton Rouge



Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

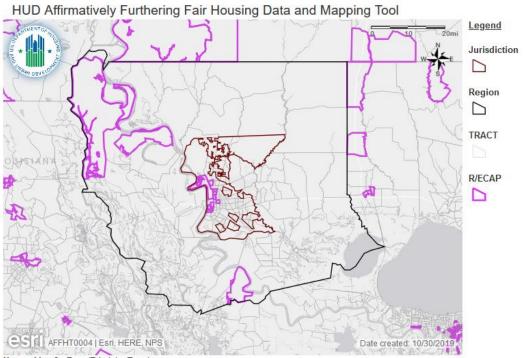
Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

R/ECAPs in the jurisdiction have changed noticeably since 1990. The R/ECAPs adjacent to the Mississippi River existed in the 1990s, disappeared briefly in the 2000s, and returned in the 2010s. The number of R/ECAPs in the jurisdiction increased significantly from the 2000s, specifically. The easternmost R/ECAP in the present day has started to develop more recently, while a few R/ECAPs found by the southern edge of the jurisdiction, briefly appeared and then disappeared after the 2010 Census. Since the demographics of the jurisdiction have changed drastically since the 1990s, with a significant increase in the Black share of the population, it is expected that tracts designated as R/ECAPs have also changed significantly over that time.

Map 23: R/ECAPs in 1990, Region



Name: Map 2 - Race/Ethnicity Trends

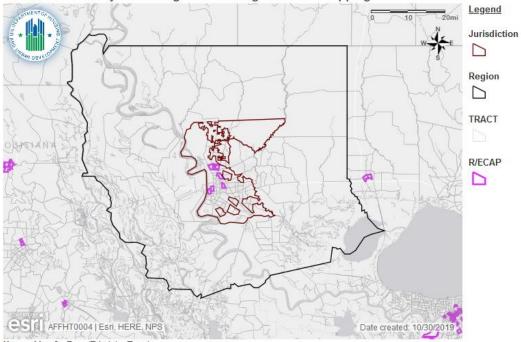
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

Map 24: R/ECAPs in 2000, Region

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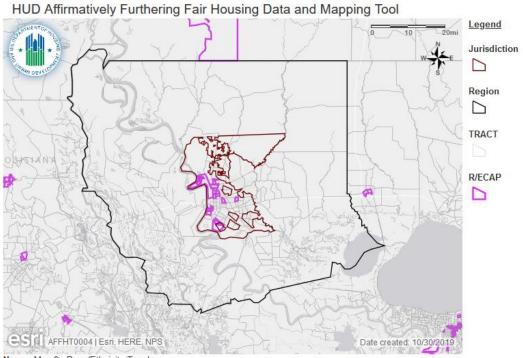
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

Map 25: R/ECAPs in 2010, Region



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

Even starker than the changes in the jurisdiction are the changes in the Region since the 1990s. All three of the R/ECAPs that existed in the Region in the 1990s, including in Morganza, Melville, and Batchelor, and further south between White Castle and Donaldsonville, all disappeared by the 2000s. These areas remained heavily non-White in the 2000s and onwards, suggesting that the R/ECAPs changed not because of demographic trends but because of economic upturns in the tracts.

B. General Issues

iii. Disparities in Access to Opportunity

Education

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

Table 10: Opportunity Indicators by Race/Ethnicity, Baton Rouge, LA and Baton Rouge, LA Region

Baton Rouge, LA	School Proficiency Index			
Total Population				
White, Non-Hispanic	54.41			
Black, Non-Hispanic	33.40			
Hispanic	40.52			
Asian or Pacific Islander, Non-Hispanic	49.22			
Native American, Non-Hispanic	44.51			
Population below federal poverty line				
White, Non-Hispanic	66.31			
Black, Non-Hispanic	33.06			
Hispanic	45.51			
Asian or Pacific Islander, Non-Hispanic	40.58			
Native American, Non-Hispanic	57.31			
(Baton Rouge, LA) Region				
Total Population				
White, Non-Hispanic	61.40			
Black, Non-Hispanic	37.46			
Hispanic	51.74			
Asian or Pacific Islander, Non-Hispanic	52.38			
Native American, Non-Hispanic	59.49			
Population below federal poverty line				
White, Non-Hispanic	62.40			
Black, Non-Hispanic	34.57			
Hispanic	51.11			
Asian or Pacific Islander, Non-Hispanic	42.80			

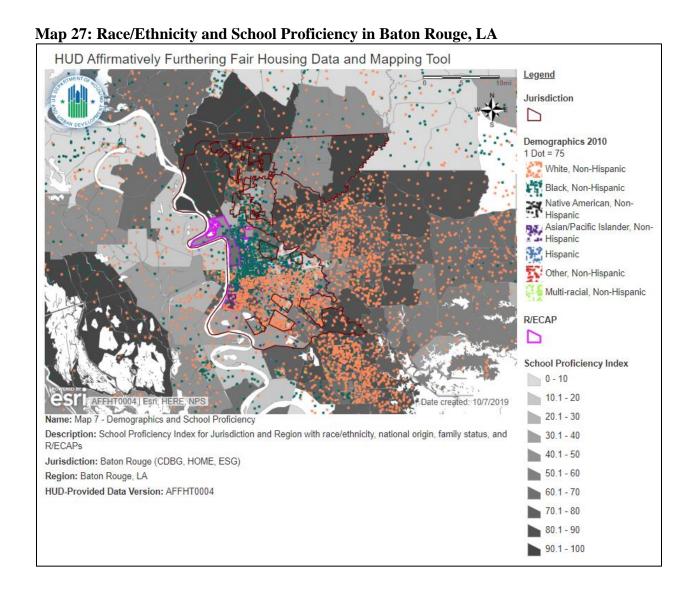
Native American, Non-Hispanic	57.87
mative innertean, non inspanie	57.07

In the Baton Rouge, LA CDBG/HOME/ESG jurisdiction, non-Hispanic Blacks (33.40) and Hispanics (40.52) have the lowest access to proficient schools as measured by the School Proficiency Index (see Table 1). By contrast, non-Hispanic Whites (54.41) and non-Hispanic Asians or Pacific Islanders (49.22) have the highest access. However, non-Hispanic Asians or Pacific Islanders with incomes below the federal poverty line have low access to proficient schools, as do low-income non-Hispanic Blacks and Hispanics.

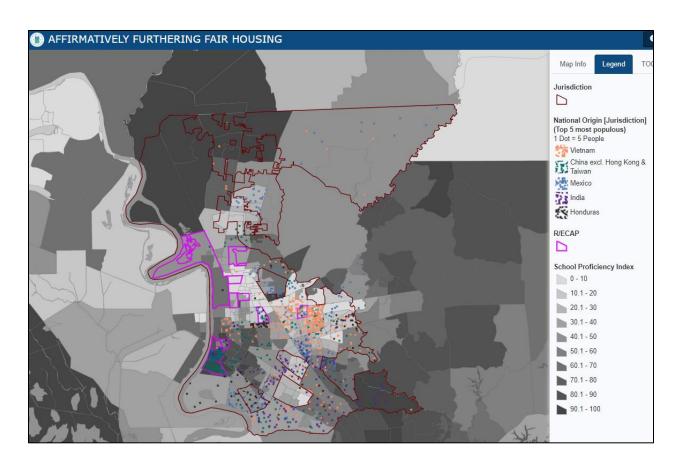
Regionally, non-Hispanic Blacks have the lowest access to proficient schools. Hispanics have better access to high-performing schools at the regional level than they do in the jurisdiction. While all non-Hispanic Asians or Pacific Islanders score similarly to Hispanics regionally, non-Hispanic Asians or Pacific Islanders with incomes below the federal poverty line obtain low scores on the school proficiency index.

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.

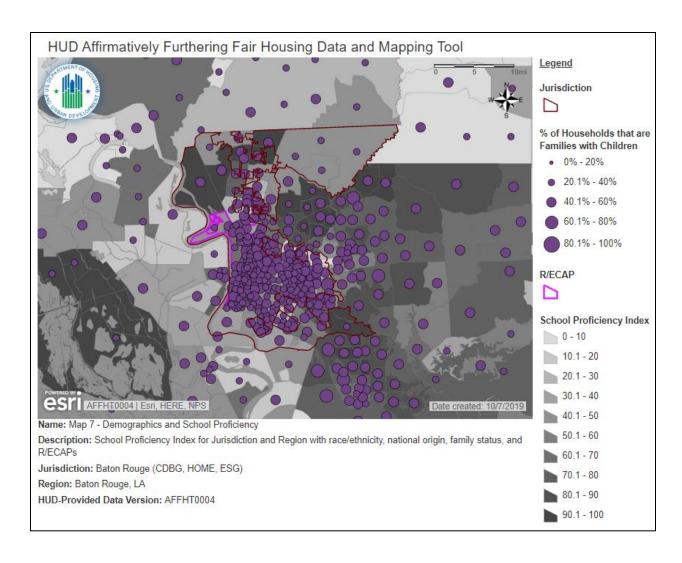
Map 26: School Proficiency in Baton Rouge, LA HUD Affirmatively Furthering Fair Housing Data and Mapping Tool Legend Jurisdiction R/ECAP \Box School Proficiency Index 0 - 10 10.1 - 20 20.1 - 30 30.1 - 40 40.1 - 50 50.1 - 60 70.1 - 80 80.1 - 90 90.1 - 100 ite created: 10/7/2019 Name: Map 7 - Demographics and School Proficiency Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and Jurisdiction: Baton Rouge (CDBG, HOME, ESG) Region: Baton Rouge, LA HUD-Provided Data Version: AFFHT0004

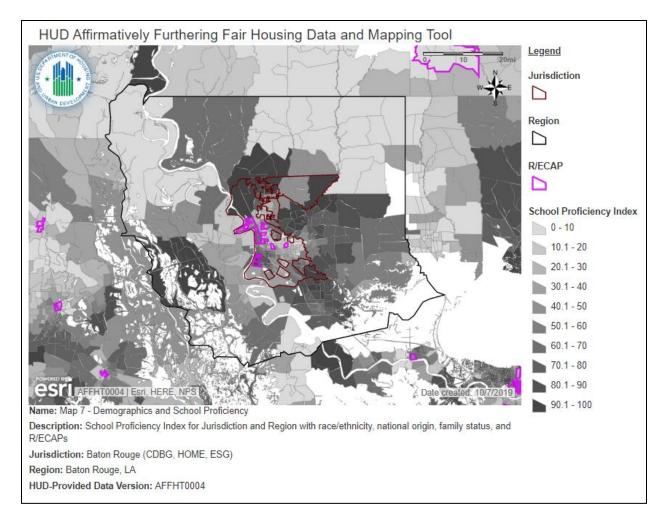


Map 28: National Origin and School Proficiency in Baton Rouge, LA



Map 29: Family Status and School Proficiency in Baton Rouge, LA





Map 26 shows that school proficiency varies considerably over the jurisdiction. Scores are highest in rural areas in the north of the parish such as Port Hudson, Zachary, and Pride/Chaneyville, as well as in Central and several neighborhoods in the southeast and southwest of the Parish (e.g. Jefferson/Tiger Bend, LSU, Old South Baton Rouge). School proficiency is lowest in the centrally located sections of the Parish, including places like Millerville, Istrouma/Dixie, and North Baton Rouge. Non-Hispanic Whites and Blacks together make up over 91 percent of the population in the jurisdiction. Black residents (see map 27) are most heavily concentrated in those centrally located neighborhoods with low access to proficient schools, and mostly absent from locations with higher performing schools. By contrast, Whites are most highly concentrated in those north- and southwestern neighborhoods with high performing schools as well in some central neighborhoods (North Sherwood Forest, Broadmoor) with lower performing schools.

The most populous foreign-born population are Vietnamese residents and they are concentrated in central neighborhoods with low performing schools (see map 28). By contrast, the second most frequently occurring group are Chinese residents, who locate in neighborhoods near LSU with higher performing schools. Indian, Mexican and Honduran residents each locate in sections of the parish with middling to low access to high performing schools.

Regionally, school proficiency is highest in Livingston Parish, northern sections of Ascension Parish, southern parts of East Feliciana Parish, and much of West Feliciana Parish. Access to high

performing schools is lowest in St. Helena, northern East Feliciana, and much of Pointe Coupee Parish.

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.

This will be answered after completion of the community participation process.

Employment

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.

Table 11: Labor Market Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge,

LA Region

Baton Rouge, LA	Labor Market Index			
Total Population				
White, Non-Hispanic	76.67			
Black, Non-Hispanic	37.45			
Hispanic	61.03			
Asian or Pacific Islander, Non-Hispanic	74.87			
Native American, Non-Hispanic	58.37			
Population below federal poverty line				
White, Non-Hispanic	75.87			
Black, Non-Hispanic	28.10			
Hispanic	59.22			
Asian or Pacific Islander, Non-Hispanic	57.50			
Native American, Non-Hispanic	77.62			
(Baton Rouge, LA) Region				
Total Population				
White, Non-Hispanic	60.32			
Black, Non-Hispanic	40.98			
Hispanic	58.51			
Asian or Pacific Islander, Non-Hispanic	74.11			
Native American, Non-Hispanic	54.58			

Population below federal poverty line			
White, Non-Hispanic	58.49		
Black, Non-Hispanic	32.91		
Hispanic	59.09		
Asian or Pacific Islander, Non-Hispanic	59.13		
Native American, Non-Hispanic	57.87		

The Labor Market Index analyzes the extent of engagement in the labor market and overall human capital in a neighborhood. Specifically, the Labor Market index measures the unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree by census tract. Higher scores indicate higher labor force participation and human capital.

In East Baton Rouge Parish, White and Asian or Pacific Islander residents live in areas with the highest rates of labor market engagement. Hispanic and Native American residents live in areas with somewhat lower rates of labor market engagement while Black residents disproportionately live in areas with a low rate of labor market engagement. In the region as a whole, Asian residents live in areas with the highest rates of labor market engagement. White and Hispanic residents live in areas with almost equal rates of labor market engagement. Black residents disproportionately live in areas with low levels of market engagement.

Among East Baton Rouge Parish residents living below the poverty line, there are large racial disparities. White residents are significantly more likely to live in areas with a high labor market index value. Asian and Hispanic residents tend to live in areas with a moderate labor market index value. Black residents are disproportionately likely to live in areas with a very low labor market index. In the region, there are smaller disparities by race for residents below the poverty line. Asian, Hispanic, and White residents below the poverty level live in areas with nearly identical levels of labor market engagement. However, there is a significant disparity between Black residents and non-Black residents. Black residents below the poverty line are the most likely to live in a neighborhood with a low Labor Market index.

Table 12: Jobs Proximity Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge, LA Region

Baton Rouge, LA	Jobs Proximity Index
Total Population	
White, Non-Hispanic	58.45
Black, Non-Hispanic	53.63
Hispanic	62.50
Asian or Pacific Islander, Non-Hispanic	58.61

 $^{^9}$ AFFH Rule Guidebook, Page 72 https://files.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf

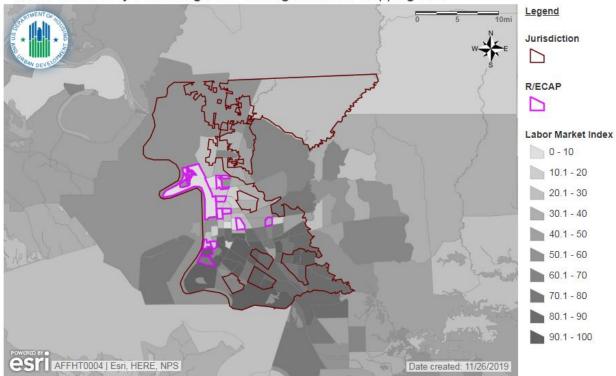
Native American, Non-Hispanic	55.13		
Population below federal poverty line			
White, Non-Hispanic	52.84		
Black, Non-Hispanic	48.31		
Hispanic	57.73		
Asian or Pacific Islander, Non-Hispanic	56.02		
Native American, Non-Hispanic	75.39		
(Baton Rouge, LA) Region			
Total Population			
White, Non-Hispanic	59.77		
Black, Non-Hispanic	54.28		
Hispanic	63.26		
Asian or Pacific Islander, Non-Hispanic	59.59		
Native American, Non-Hispanic	55.97		
Population below federal poverty line			
White, Non-Hispanic	47.39		
Black, Non-Hispanic	48.19		
Hispanic	52.15		
Asian or Pacific Islander, Non-Hispanic	56.10		
Native American, Non-Hispanic	59.45		

The Jobs Proximity Index quantifies the physical distances between neighborhoods and job locations. Distance to larger employment centers are weighted more heavily. A higher index values indicates better access to job centers.

In both East Baton Rouge Parish and the region, Hispanic residents tend to live in areas with the highest job proximity value. Asian and White residents live in neighborhoods with somewhat lower job proximity index values while Black residents live in neighborhoods with the lowest values. Among residents living below the poverty line, Hispanic residents again live in areas with the highest job proximity value followed by White, Asian, and Black residents. For residents in the region living below the poverty level, Native American and Asian residents live in areas with the highest access to jobs followed by Hispanic, Black and White residents.

Map 31: Labor Market Index, East Baton Rouge Parish

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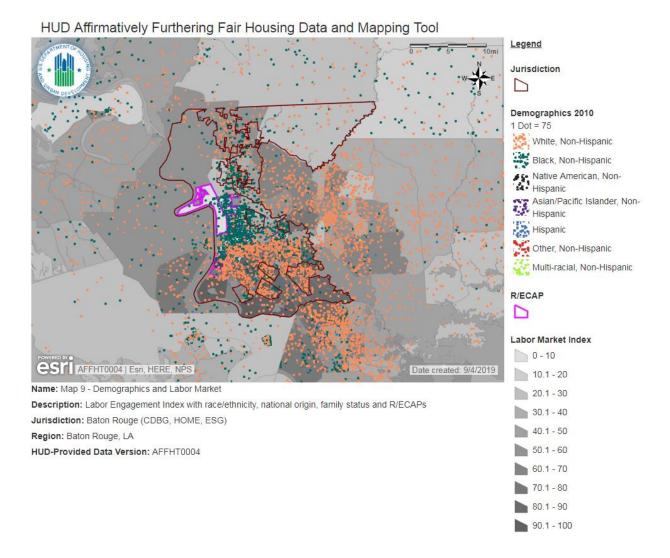
Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

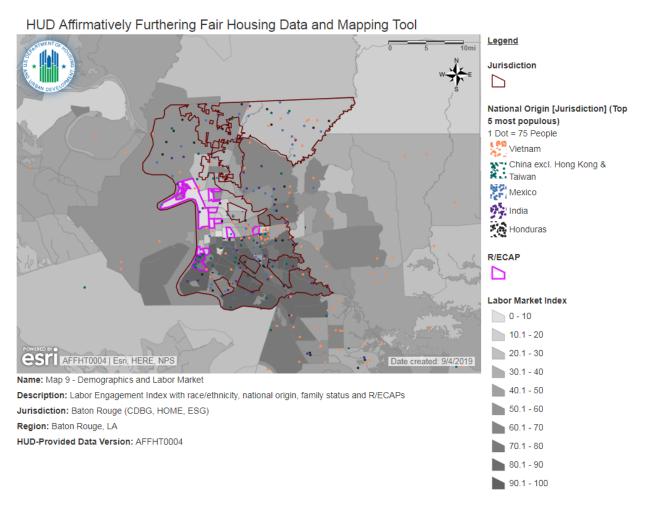
Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

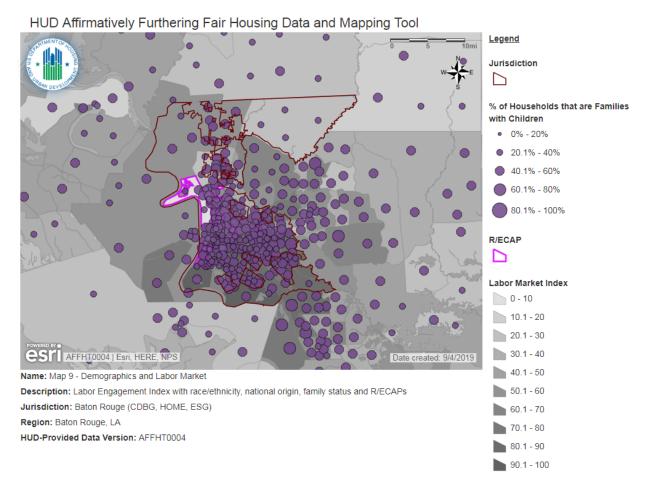
Region: Baton Rouge, LA

Map 32: Labor Market Index by Race/Ethnicity, East Baton Rouge Parish



Map 33: Labor Market Index by National Origin (Top 5 Most Populous), East Baton Rouge Parish





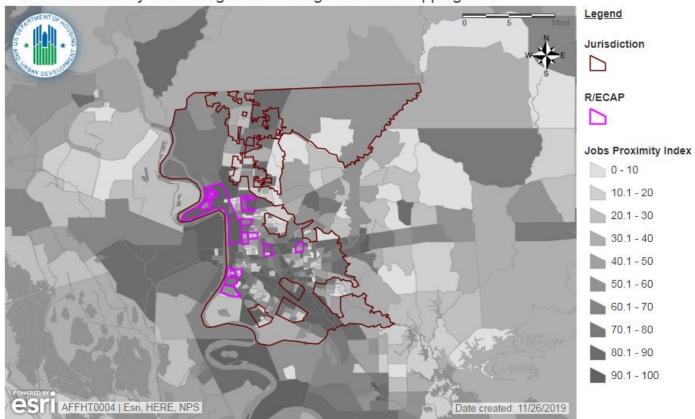
Map 34: Labor Market Index Scores by Family Status, East Baton Rouge Parish

Labor Market Index scores are generally highest in the southern parts of the parish and weakest in northern Baton Rouge and neighborhoods east of downtown. Scores are also relatively high in the northwestern parts of the parish. Regionally, Labor Market Index scores are generally high in Ascension, West Baton Rouge, and Livingston Parishes as well as part of West Feliciana and East Feliciana Parishes.

African American residents are concentrated in the central portions of the parish with the weakest Labor Market Index scores. There is a high concentration of White residents in the areas that have some of the highest index scores in the region including southern areas of East Baton Rouge Parish, portions of West Baton Rouge Parish, and in western Ascension Parish. Asian residents are concentrated in southern parts of the parish that have higher index scores. Hispanic residents also tend to be concentrated in parts of East Baton Rouge Parish that have higher index scores. There are also concentrations of Hispanic residents in areas of Ascension and Livingston Parish that have moderate to high index scores. Foreign-born residents tend to live in southern parts of the parish with moderate to high index scores. There is not a clear connection between labor market index scores and the share of households that are families with children.

Map 35: Job Proximity Index, East Baton Rouge Parish

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Name: Map 8 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and

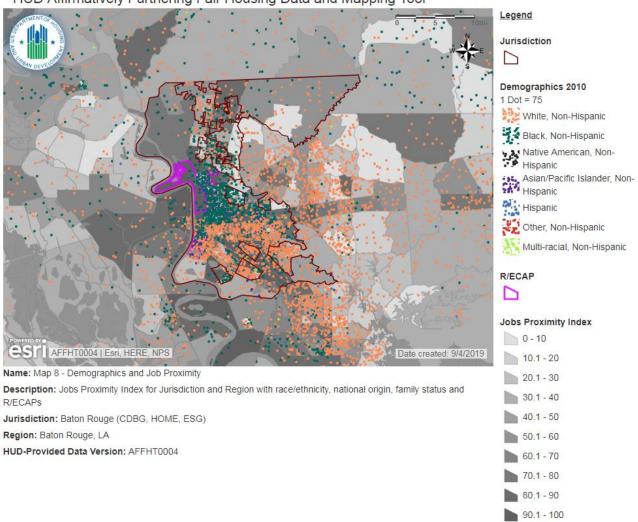
R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

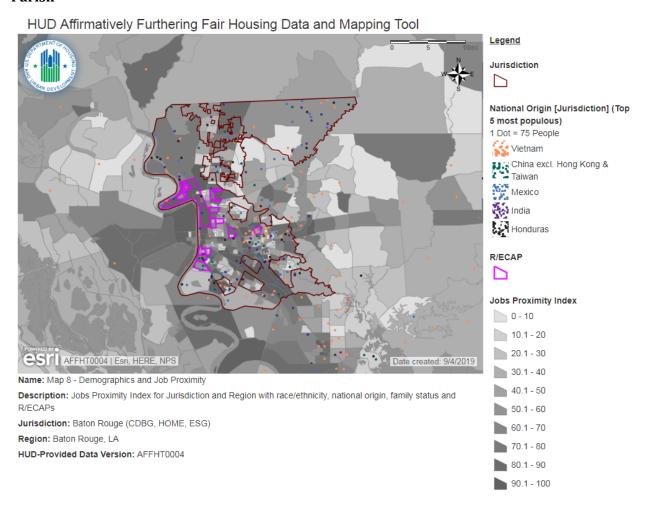
Region: Baton Rouge, LA

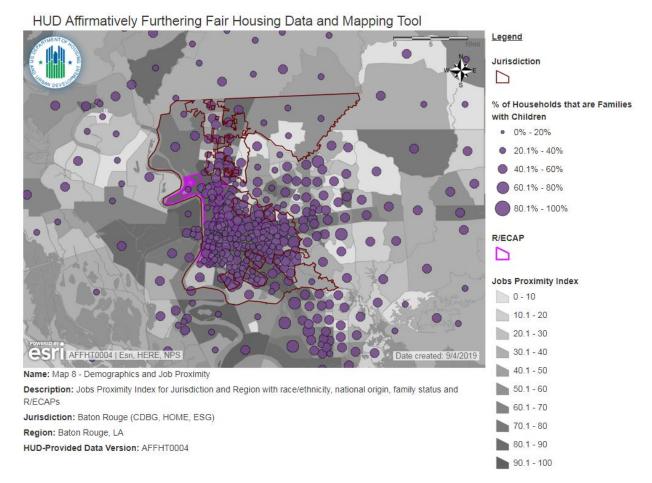
Map 36: Jobs Proximity Index by Race/Ethnicity, East Baton Rouge Parish

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Map 37: Jobs Proximity Index by National Origin (Top 5 most populous), East Baton Rouge Parish





Map 38: Jobs Proximity Index by Family Status, East Baton Rouge Parish

East Baton Rouge Parish is the center of employment in the metropolitan area with approximately 70-80% of the regional workforce employed in the parish. ¹⁰ Job Proximity Index scores in the parish are generally highest in areas adjacent to downtown Baton Rouge and along the I-10 corridor. There are also neighborhoods with very low index scores interspersed between neighborhoods with very high scores Regionally, scores are high in Port Allen and areas located near major industrial facilities.

Black residents make up a large proportion of the population in many census tracts in the parish with the highest Job Proximity Index scores. Indeed, several R/ECAPs have relatively high scores. In a number of cases, this data represents majority-black neighborhoods adjacent to environmental hazards like refineries, chemical plants, and the airport. Many Baton Rouge census tracts with the lowest Job Proximity Index scores also have a disproportionately high Black population. White and Asian residents tend to live in areas with moderate and high scores. Hispanic residents are concentrated in areas with moderate scores. There is not a clear relationship between Job Proximity and national origin.

¹⁰ https://www.brla.gov/DocumentCenter/View/1969/Land-Use-PDF?bidId=

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.

This will be answered after the completion of the community participation process.

Transportation

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.

Table 13: Transit Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge, LA Region

Baton Rouge, LA	Transit Index					
Fotal Population						
White, Non-Hispanic	40.54					
Black, Non-Hispanic	41.63					
Hispanic	41.39					
Asian or Pacific Islander, Non-Hispanic	42.66					
Native American, Non-Hispanic	40.90					
Population below federal poverty line						
White, Non-Hispanic	48.88					
Black, Non-Hispanic	43.46					
Hispanic	46.21					
Asian or Pacific Islander, Non-Hispanic	46.88					
Native American, Non-Hispanic	43.26					
(Baton Rouge, LA) Region						
Total Population						
White, Non-Hispanic	28.05					
Black, Non-Hispanic	34.31					
Hispanic	32.87					
Asian or Pacific Islander, Non-Hispanic	38.72					
Native American, Non-Hispanic	28.87					
Population below federal poverty line						
White, Non-Hispanic	32.52					
Black, Non-Hispanic	36.41					

Hispanic	37.38
Asian or Pacific Islander, Non-Hispanic	42.50
Native American, Non-Hispanic	33.53

HUD's Transit Index is based on estimates of how often low-income families in a neighborhood use public transportation annually. The higher the transit trips index value, the higher likelihood that residents use transit. A higher index value often reflects better access to transit.

East Baton Rouge Parish has relatively low levels of transit ridership. Approximately 1.7% of East Baton Rouge Parish residents use transit to get to work. In the parish, there are not significant disparities between different racial and ethnic groups in transit trip index scores. All racial or ethnic groups tend to live in areas with moderate access to transit with Asian residents living in areas with the highest Transit Index values and White residents in areas with the lowest values. For Baton Rouge residents below the poverty level, Transit Index values are generally higher. Disparities between groups are larger for the population living below the poverty level but are still insignificant. White residents live in neighborhoods with the highest values followed closely by Asian and Hispanic residents. Black and Native American residents live in areas with the lowest values.

In the region, Transit Index values are lower for all racial and ethnic groups than in Baton Rouge, likely due to more limited availability of transit. Asian residents have the highest Transit Index Values followed by Black and Hispanic residents. White residents have the lowest Transit Index values. Like in Baton Rouge, Transit Index Values for the region's population below the poverty level are higher than for the total population. Asian residents live in neighborhoods with the highest values followed by Black and Hispanic residents. White residents tend to live in areas with the lowest Transit Index values.

Table 14: Low Transportation Cost Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge. LA Region

Baton Rouge, LA	Low Transportation Cost Index
Total Population	
White, Non-Hispanic	60.33
Black, Non-Hispanic	61.71
Hispanic	63.65
Asian or Pacific Islander, Non-Hispanic	63.51
Native American, Non-Hispanic	61.02
Population below federal poverty line	
White, Non-Hispanic	66.65

¹¹ Capital Region Planning Commission, MOVE 2042,

 $https://static1.squarespace.com/static/54cbd54fe4b047a0380cae54/t/5a9d6da2085229db1debd085/1520266663846/MOVE2042_Ch_09_Transit.pdf$

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Black, Non-Hispanic 63.13				
Hispanic	68.59			
Asian or Pacific Islander, Non-Hispanic	66.56			
Native American, Non-Hispanic	69.17			
(Baton Rouge, LA) Region				
Total Population				
White, Non-Hispanic	42.85			
Black, Non-Hispanic	50.23			
Hispanic	50.68			
Asian or Pacific Islander, Non-Hispanic	57.86			
Native American, Non-Hispanic	43.68			
Population below federal poverty line				
White, Non-Hispanic	47.74			
Black, Non-Hispanic	52.52			
Hispanic	55.25			
Asian or Pacific Islander, Non-Hispanic	61.79			
Native American, Non-Hispanic	53.85			

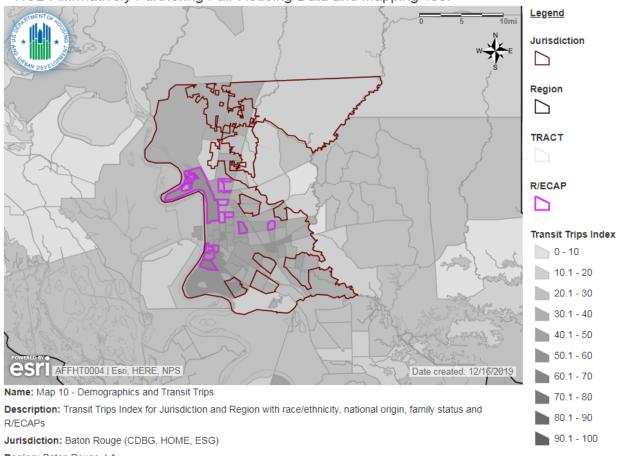
The Low Transportation Cost Index is based on estimates of transportation expenses for a low-income family. The index ranges from 0 to 100 with higher scores indicating lower transportation costs. There is very little variation in the transit index by racial and ethnic group in Baton Rouge. Hispanic and Asian residents have slightly higher access to low cost transportation than Black and White residents. Overall, there is fairly equal access to low cost transportation for all racial or ethnic groups in East Baton Rouge Parish. There is also relatively little variation by race and ethnicity for the population below the poverty level. Residents of all racial and ethnic groups living below the poverty line have better access to low cost transportation than the overall population.

Regionally, there is greater variation in index values across racial/ethnic groups. Asian residents have the highest access to low cost transportation. White residents have the lowest. Hispanic and Black residents have scores in between. These trends are similar population below the poverty line as well. All racial and ethnic groups living below the poverty level have higher scores than for the total population.

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.

Map 39: Transit Trips Index, East Baton Rouge Parish

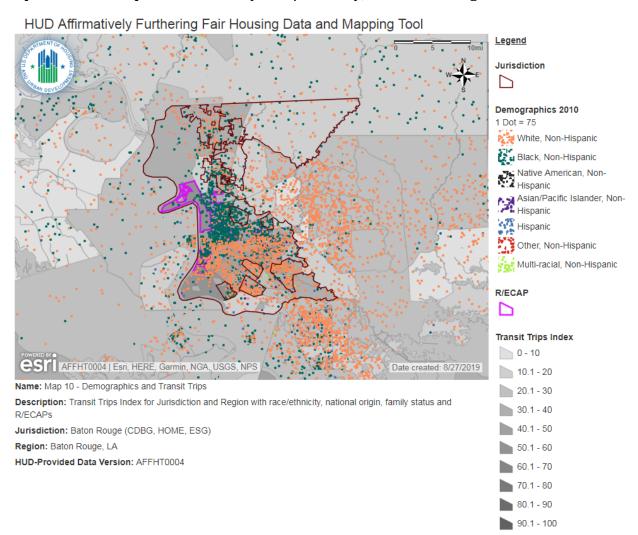
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Region: Baton Rouge, LA

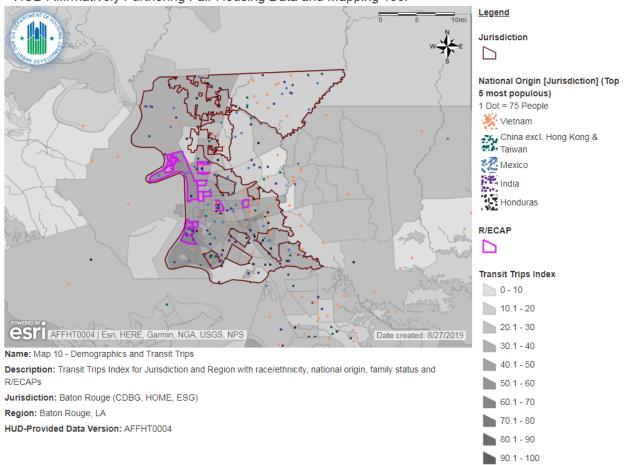
HUD-Provided Data Version: AFFHT0004

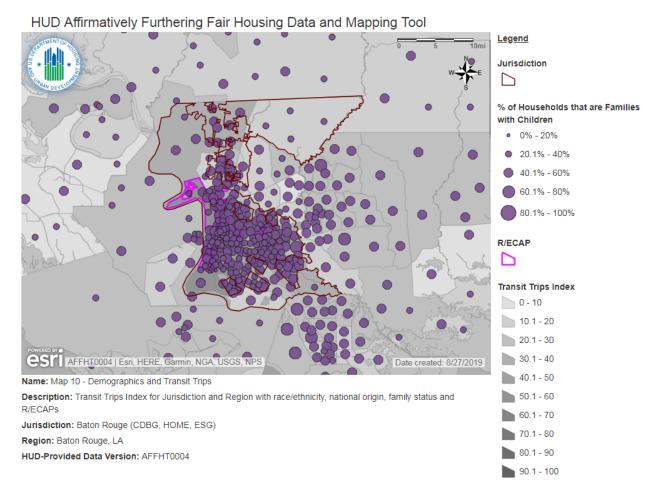
Map 40: Transit Trips Index Scores by Race/Ethnicity, East Baton Rouge Parish



Map 41: Transit Trips Index Scores by National Origin (Top 5 most populous), East Baton Rouge Parish

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool





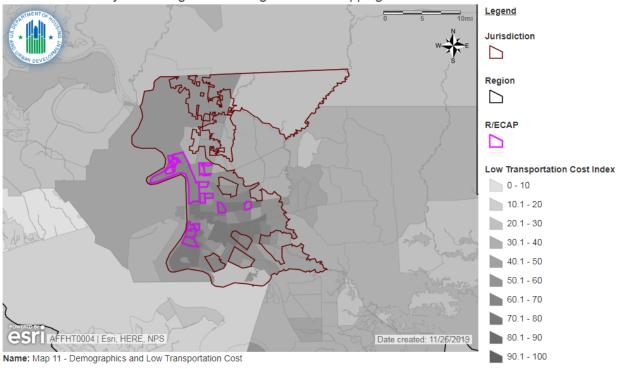
Map 42: Transit Trips Index Scores by Family Status, East Baton Rouge Parish

Map 39 shows that Transit Trips Index scores are generally moderate to low throughout the region. Scores are highest in central parts of the parish as well as in the southwestern parts of the parish. Northern parts of the parish tend to have transit index scores below 30. The highest transit index scores are in census tracts containing the LSU campus and surrounding area, downtown Baton Rouge, and Southern University.

The map shows that there is a high concentration of Black residents in census tracts with the highest transit index scores, suggesting that Black residents may have better access to transit service than non-Black residents. There is a high concentration of Asian residents in census tracts near LSU with high scores and in southern parts of the parish with low to moderate scores. Hispanic residents also tend to live in southern parts of the parish as well as in Ascension parish with low to moderate scores. The five top places of birth for the foreign-born population in East Baton Rouge Parish are Vietnam, China, Mexico, India and Honduras. There is no evident spatial pattern for foreign-born residents in relation to transit access.

Map 43: Low Transportation Cost Index, East Baton Rouge Parish

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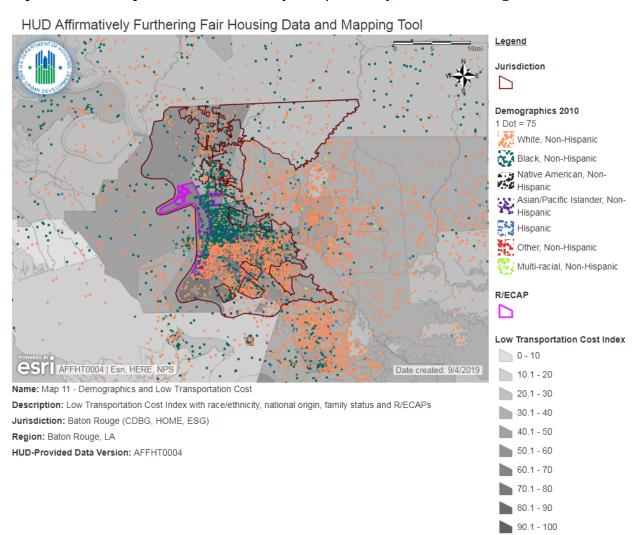
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

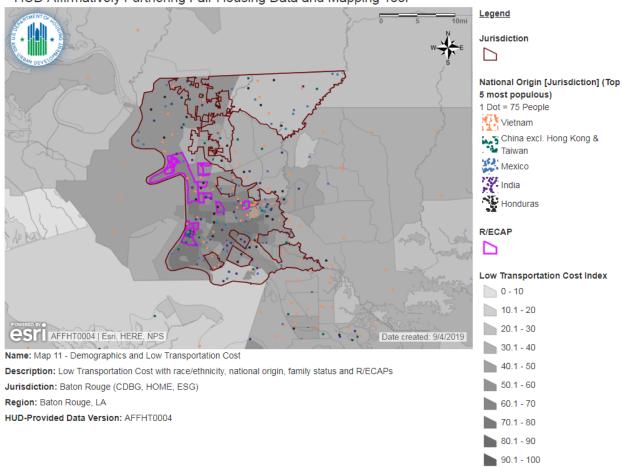
HUD-Provided Data Version: AFFHT0004

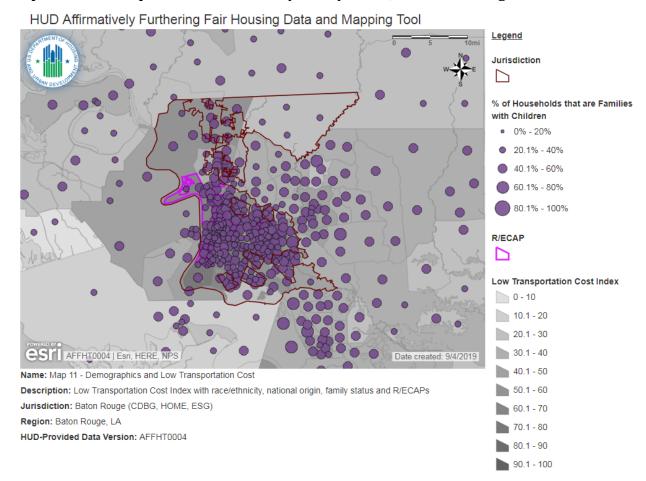
Map 44: Low Transportation Cost Index by Race/Ethnicity, East Baton Rouge Parish



Map 45: Low Transportation Cost Index by National Origin (Top 5 most populous), East Baton Rouge Parish

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool





Map 46: Low Transportation Cost Index by Family Status, East Baton Rouge Parish

Low Transportation Cost Index scores are moderate to high in East Baton Rouge Parish. Areas with the highest scores are generally within the Baton Rouge Jurisdiction, including downtown, the LSU campus, and College Town. Many neighborhoods in South Baton Rouge, Mid-City, and the eastern portion of the parish also have high scores. Low Transportation cost index scores are lowest in Pride/Chaneyville in the northeast part of the parish, Port Hudson, and South Bluebonnet/Nicholson in south Baton Rouge.

While there are high concentrations of Black residents in eastern Baton Rouge and northern Baton Rouge neighborhoods with moderate to high index scores, there are high concentrations of White residents in South Baton Rouge neighborhoods with high index scores and in areas of the parish with some of the lowest index scores. Overall, there does not appear to be significant disparities in transportation costs based on race and ethnicity. Foreign-born individuals are interspersed in neighborhoods with varying index scores. There is not a clear correlation between low transportation costs and national origin.

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.

This will be answered after the completion of the community participation process.

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.

Table 15: Low Poverty Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge, LA Region

Baton Rouge, LA	Low Poverty Index
Total Population	
White, Non-Hispanic	65.51
Black, Non-Hispanic	27.60
Hispanic	45.65
Asian or Pacific Islander, Non-Hispanic	59.49
Native American, Non-Hispanic	45.32
Population below federal poverty line	
White, Non-Hispanic	64.37
Black, Non-Hispanic	17.55
Hispanic	44.54
Asian or Pacific Islander, Non-Hispanic	44.09
Native American, Non-Hispanic	73.06
(Baton Rouge, LA) Region	
Total Population	
White, Non-Hispanic	57.14
Black, Non-Hispanic	33.27
Hispanic	47.50
Asian or Pacific Islander, Non-Hispanic	60.51
Native American, Non-Hispanic	50.36
Population below federal poverty line	
White, Non-Hispanic	53.09

Assessment of Fair Housing 2020, East Baton Rouge Parish LA

Black, Non-Hispanic	22.86
Hispanic	44.16
Asian or Pacific Islander, Non-Hispanic	41.13
Native American, Non-Hispanic	66.38

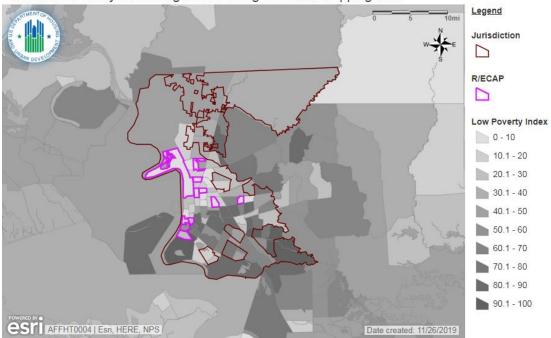
The Low Poverty Index is based on the poverty rate at the census tract level. A higher value indicates a greater likelihood that a family will live in an area with better neighborhood conditions and less exposure to poverty. Values on the index range from 0 to 100. There are considerable disparities between racial groups within the jurisdiction as well as the region. White residents in the jurisdiction tend to live in areas with the highest Low Poverty Index scores followed closely by Asian residents. Hispanic residents tend to live in areas with moderate Low Poverty Index scores. Black residents disproportionately live in areas with the lowest scores. Among residents living below the poverty level, there is a large disparity between Black and non-Black residents. Poor Black residents are much more likely to live in areas with higher poverty than poor residents of all other racial and ethnic groups.

In the region overall, Asian residents have the highest scores on the low poverty index followed closely by White residents. Black residents again have the lowest scores. For the population below the poverty level, White residents have the greatest access to low poverty neighborhoods. Poor Black residents in the region have higher scores on the index than poor Black residents of Baton Rouge but are much more likely to live in areas with higher poverty than poor residents of other racial and ethnic groups.

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

Map 47: Low Poverty Index, East Baton Rouge Parish

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Name: Map 12 - Demographics and Poverty

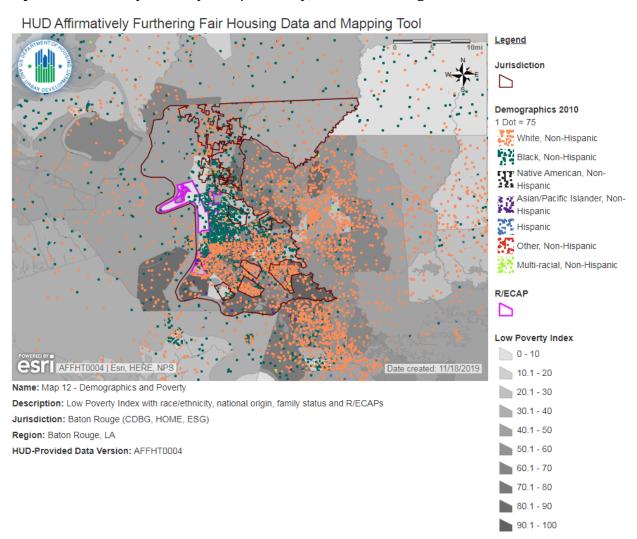
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

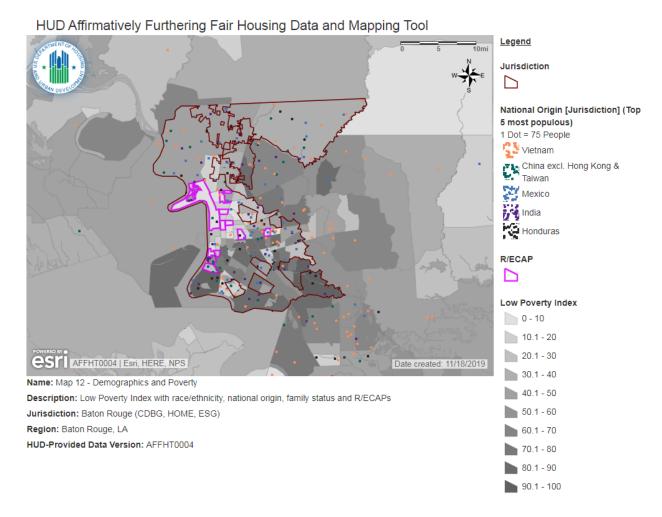
Region: Baton Rouge, LA

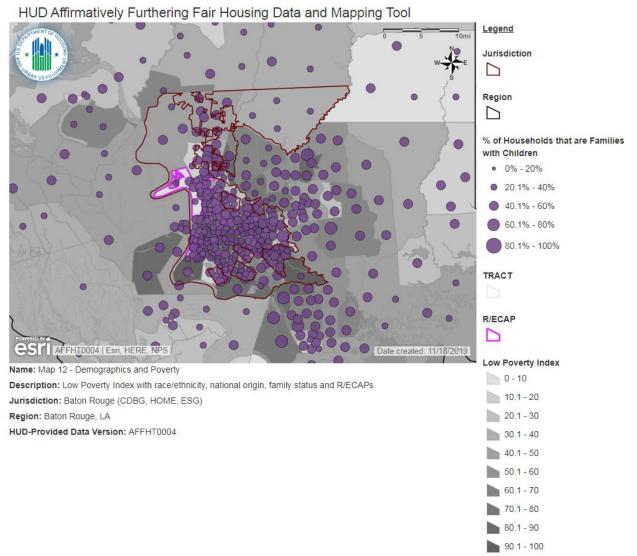
HUD-Provided Data Version: AFFHT0004

Map 48: Low Poverty Index by Race/Ethnicity, East Baton Rouge Parish



Map 49: Low Poverty Index by National Origin (Top 5 most populous), East Baton Rouge Parish





Map 50: Low Poverty Index Scores by Family Status, East Baton Rouge Parish

Disparities in access to low poverty neighborhoods are closely linked to residential living patterns. Neighborhoods with the highest poverty rates are generally clustered along the Mississippi River. Baton Rouge has several R/ECAPs with a predominantly Black population which contributes significantly to lower Index scores for Black residents. Generally, Black residents are concentrated in neighborhoods north of downtown and in the Mid-City area with relatively low Index scores. Overall, Black residents in the parish are more likely to live in areas with higher rates of poverty. White residents are disproportionately likely to live in areas with less poverty including Zachary, South Baton Rouge, and Southeast East Baton Rouge neighborhoods such as Jefferson/Tiger Bend and Shenandoah. Asian residents are also concentrated in southern portions of the parish with higher Index scores. Hispanic residents are concentrated in the east and southern portions of the parish with moderate to high poverty.

Foreign-born residents are concentrated near the LSU campus and in East Baton Rouge neighborhoods with low to moderate Low Poverty Index scores. Map 50 shows that there is not a clear correlation between family status and access to low poverty neighborhoods.

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.

This will be answered after the completion of the community participation process.

Access to Environmentally Healthy Neighborhoods

For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Table 16: Environmental Health Index by Race/Ethnicity, Baton Rouge, LA and Baton Rouge, LA Region

	Environmental Health
Baton Rouge, LA	Index
Total Population	
White, Non-Hispanic	22.44
Black, Non-Hispanic	15.91
Hispanic	22.07
Asian or Pacific Islander, Non-Hispanic	21.84
Native American, Non-Hispanic	19.93
Population below federal poverty line	
White, Non-Hispanic	19.33
Black, Non-Hispanic	13.36
Hispanic	21.55
Asian or Pacific Islander, Non-Hispanic	20.74
Native American, Non-Hispanic	19.89
(Baton Rouge, LA) Region	
Total Population	
White, Non-Hispanic	30.23
Black, Non-Hispanic	23.57

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Hispanic	26.53				
Asian or Pacific Islander, Non-Hispanic	24.10				
Native American, Non-Hispanic	28.95				
Population below federal poverty line					
White, Non-Hispanic	28.46				
Black, Non-Hispanic	21.61				
Hispanic	25.26				
Asian or Pacific Islander, Non-Hispanic	22.47				
Native American, Non-Hispanic	28.71				

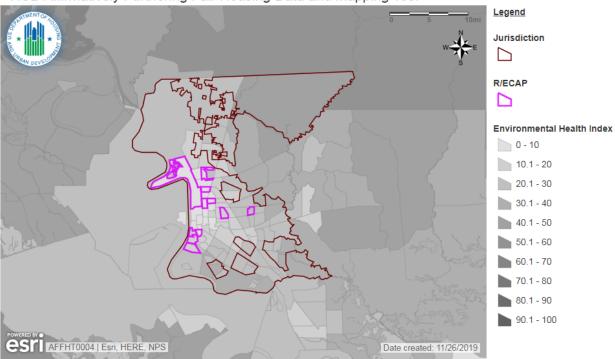
The Environmental Health Index measures exposure to hazardous air pollutants that are known to cause cancer or other serious health effects. Lower Index values indicate more exposure to hazardous pollution. Generally, urban areas tend to have lower index values due to the greater amount of vehicles and fixed sources of pollutants in such areas. Although the index provides information on exposure to carcinogenic and neurologic airborne toxins, it does not measure water quality or soil contamination.

Generally, all racial and ethnic groups in East Baton Rouge Parish have low Environmental Health Index scores. This may be due partly to the large concentration of industrial facilities in Baton Rouge. There is also a clear disparity between the scores for Black residents and scores for other groups, which is likely related to the proximity of majority-black neighborhoods in north Baton Rouge to environmental hazards like refineries, chemical plants, and the airport. White residents generally live in areas with the highest Index scores. Scores for Asian and Hispanic residents are slightly lower than those for White residents. Black residents tend to reside in areas with the lowest scores, indicating that they have the most exposure to air pollution. Residents living below the poverty line of all groups tend to live in areas with lower Environmental Health Index scores than the total population. Regional Health Index scores for all racial and ethnic groups are slightly higher than for East Baton Rouge Parish. White residents in the region tend to live in areas with the highest Index scores while Black residents have the lowest.

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.

Map 51: Environmental Health Index, East Baton Rouge Parish

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Name: Map 13 - Demographics and Environmental Health

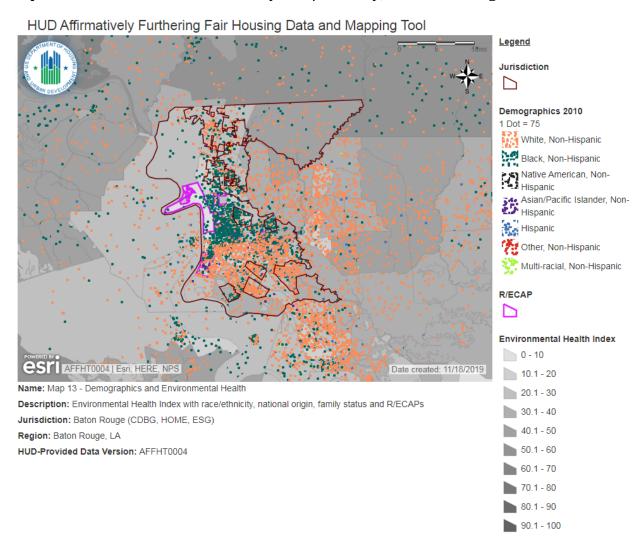
 $\textbf{Description:} \ \, \textbf{Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs}$

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

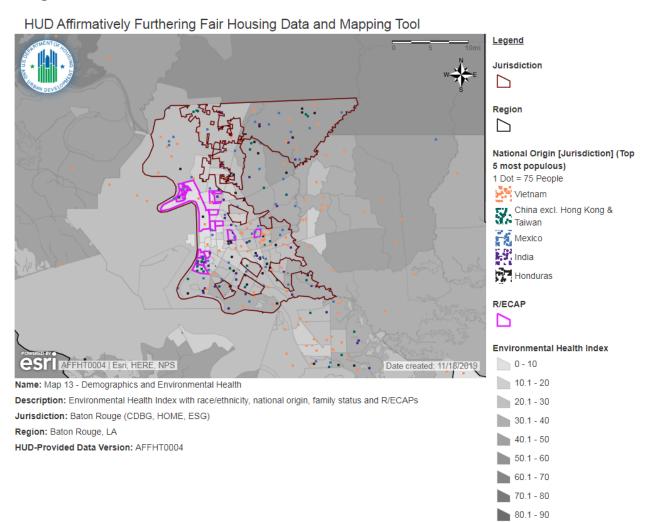
HUD-Provided Data Version: AFFHT0004

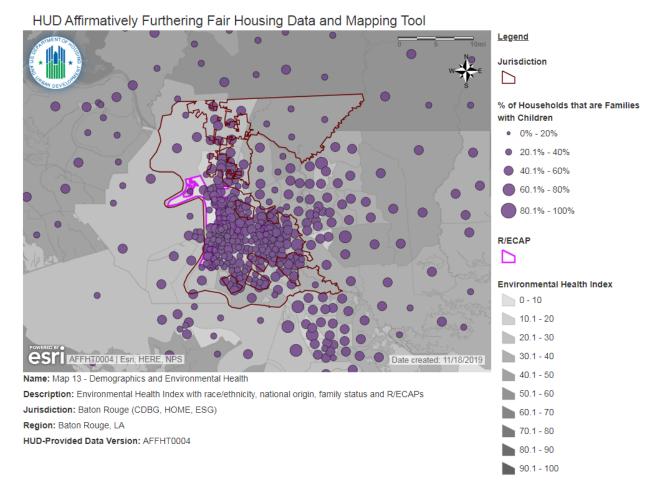
Map 52: Environmental Health Index by Race/Ethnicity, East Baton Rouge Parish



90.1 - 100

Map 53: Environmental Health Index by National Origin (Top 5 most populous), East Baton Rouge Parish





Map 54: Environmental Health Index by Family Status, East Baton Rouge Parish

Environmental Health Index scores are relatively low in East Baton Rouge Parish and in much of the region. Areas with the lowest scores (0-10) are located along the Mississippi River and largely are within the jurisdiction's boundaries. Many of these areas are R/ECAPs as well. Environmental Health Index scores are generally higher in the rural northern part of the parish as well as in the southeastern part of the parish.

Black residents are disproportionately concentrated in areas of Baton Rouge that have some of the lowest Environmental Health Index scores. White residents are more spread out through the region and there are high concentrations of White residents in areas of the parish with higher environmental health index scores. Asian residents are concentrated in the southern portions of East Baton Rouge Parish which have higher scores than central Baton Rouge. Hispanic residents also tend to be more concentrated in the southern part of the Parish as well as in Livingston and Ascension Parishes which have higher environmental index scores than central Baton Rouge.

Foreign-born individuals are largely concentrated in areas that have an Environmental Health Index Score range of 20.1-30. Individuals from Vietnam are concentrated in the northern and southern portions of East Baton Rouge parish that have slightly higher scores than neighborhoods in the jurisdiction. There is also a concentration of Vietnamese individuals in Ascension and

Livingston Parishes. Areas that have the highest shares of households that are families with children tend to have higher environmental health index scores than central Baton Rouge.

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.

This section will be answered after the completion of the community participation process.

Patterns in Disparities in Access to Opportunity

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.

The data show that access to opportunity is generally highest for White residents in Baton Rouge and the region. Opportunity metrics routinely have the highest scores in neighborhoods with high concentrations of White residents. Black residents generally have the lowest access to opportunity. Asian residents tend to have moderate to high access to opportunity and Hispanic residents also live in a wider variety of neighborhoods in terms of access to opportunity. These overarching patterns of access to opportunity are closely linked to patterns of residential segregation as well as the presence of R/ECAPs.

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

Generally, there are clear geographic trends for many opportunity indicators. Northern and eastern neighborhoods in the jurisdiction tend to have lower access to opportunity. Southeast and northern parts of the parish outside of the jurisdiction boundaries, including Zachary, Baker, and Central, tend to have higher access across multiple indicators.

Additional Information

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.

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).

B. General Issues

iv. Disproportionate Housing Needs

Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Across the board, non-White residents face higher rates of housing problems within the jurisdiction. Those living in the jurisdiction generally have slightly higher rates of housing problems than those in the region, though severe housing problems are more pronounced in the jurisdiction compared to the region. Compared to White residents in the jurisdiction having a 27.76% rate of experiencing housing problems, Black residents have a rate of 44.24%, Hispanic residents, 48.38%, Asian or Pacific Islander, 34.44%, and Native American, 50.00%. These are significantly higher than the rate for White residents, though both the jurisdiction and the region experience high rates of housing problems. Disparities are slightly lower for severe housing problems, though Hispanic residents notably face almost double the rate of severe housing problems as White residents.

Severe Housing Cost Burdens are higher in the jurisdiction than in the region, overall, though clear disparities exist in both. Black and Hispanic residents face higher rates of severe cost burdens than do White and Asian or Pacific Islander residents. While severe cost burdens are slightly higher in the jurisdiction than in the region for most racial/ethnic groups, the difference is largest for White residents, who face significantly higher cost burdens in the jurisdiction than in the region.

Table 17: Housing Problems

Disproportionate Housing Needs	(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction			(Baton Rouge, LA) Region		
Households experiencing any of 4 housing problems	# with problems			# with problems	# of households	% with problems
Race/Ethnicity						
White, Non-						
Hispanic	15,277	55,032	27.76%	40,961	183,075	22.37%
Black, Non-						
Hispanic	23,167	52,361	44.24%	39,656	96,893	40.93%
Hispanic	1,646	3,402	48.38%	3,182	7,659	41.55%
Asian or Pacific						
Islander, Non-						
Hispanic	1,212	3,519	34.44%	1,532	4,725	32.42%
Native American,						
Non-Hispanic	87	174	50.00%	138	721	19.14%

	_					
Other, Non-						
Hispanic	558	1,449	38.51%	1,003	2,805	35.76%
Total	41,975	115,935	36.21%	86,475	295,915	29.22%
Household Type						
and Size						
Family households,						
<5 people	15,834	57,588	27.50%	38,305	172,638	22.19%
Family households,						
5+ people	3,910	8,638	45.27%	10,574	25,393	41.64%
Non-family						
households	22,250	49,765	44.71%	37,585	97,859	38.41%
Households						
experiencing any						
of 4 Severe	# with		% with	# with		% with
Housing	severe	# of	severe	severe	# of	severe
Problems	problems	households	problems	problems	households	problems
Race/Ethnicity						
White, Non-						
Hispanic						
	8,403	55,032	15.27%	21,386	183,075	11.68%
Black, Non-						
Black, Non- Hispanic	8,403 13,394	55,032 52,361	15.27% 25.58%	21,386 22,479	183,075 96,893	11.68% 23.20%
Hispanic	13,394	52,361	25.58%	22,479	96,893	23.20%
Hispanic Hispanic	13,394	52,361	25.58%	22,479	96,893	23.20%
Hispanic Hispanic Asian or Pacific	13,394	52,361	25.58%	22,479	96,893	23.20%
Hispanic Hispanic Asian or Pacific Islander, Non-	13,394 1,061 833	52,361 3,402	25.58% 31.19%	22,479 2,047 1,022	96,893 7,659	23.20% 26.73%
Hispanic Hispanic Asian or Pacific Islander, Non- Hispanic	13,394	52,361 3,402	25.58% 31.19%	22,479 2,047	96,893 7,659	23.20% 26.73%
Hispanic Hispanic Asian or Pacific Islander, Non- Hispanic Native American,	13,394 1,061 833	52,361 3,402 3,519	25.58% 31.19% 23.67%	22,479 2,047 1,022 53	96,893 7,659 4,725	23.20% 26.73% 21.63%
Hispanic Hispanic Asian or Pacific Islander, Non- Hispanic Native American, Non-Hispanic	13,394 1,061 833	52,361 3,402 3,519	25.58% 31.19% 23.67%	22,479 2,047 1,022	96,893 7,659 4,725	23.20% 26.73% 21.63%

Note 1: The four housing problems are defined as: 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%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affhdata-documentation).

Table 18: Households with Severe Housing Cost Burden

Households	Total William	ore mousing e	ost Bur deri	•		
with Severe						
Housing Cost	(Baton Rouge, LA CDBG, HOME,					
Burden	•	ESG) Jurisdiction		(Baton Rouge, LA) Region		
	# with	#	% with severe	# with severe	#	% with
Dana /Edan laite	severe cost	household	cost	cost	household	severe cost
Race/Ethnicity	burden	S	burden	burden	S	burden
White, Non-	= 0.4.4		4 4 4 4 0 7	4=0==	400.0	0.4007
Hispanic	7,944	55,032	14.44%	17,355	183,075	9.48%
Black, Non- Hispanic	11,770	52,361	22.48%	19,130	96,893	19.74%
Hispanic	667	3,402	19.61%	1,314	7,659	17.16%
Asian or Pacific Islander, Non-Hispanic	564	3,519	16.03%	733	4,725	15.51%
Native American, Non- Hispanic	8	174	4.60%	18	721	2.50%
Other, Non- Hispanic	309	1,449	21.33%	529	2,805	18.86%
Total	21,262	115,935	18.34%	39,079	295,915	13.21%
Household Type and Size						
Family households, <5 people	6,768	57,588	11.75%	16,129	172,638	9.34%
Family households, 5+ people	1,370	8,638	15.86%	2,751	25,393	10.83%
Non-family households	13,137	49,765	26.40%	20,208	97,859	20.65%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details

(www.hudexchange.info/resource/4848/affh-data-documentation).

In addition to the data provided by HUD above, the American Community Survey also provides data detailing the numbers of households subject to overcrowding or incomplete plumbing and kitchen facilities. These numbers are different across racial/ethnic groups, with Black, Asian or Pacific

Islander and Hispanic households experiencing higher rates of overcrowding than White or Native American households.

Table 19: Percentage of Overcrowded Households by Race or Ethnicity, 2013-2017 American Community Survey

Non-Hispanic White Households	Black Households	Native American Households	Asian American or Pacific Islander Households	Hispanic Households
0.50%	4.09%	0.00%	6.23%	5.03%

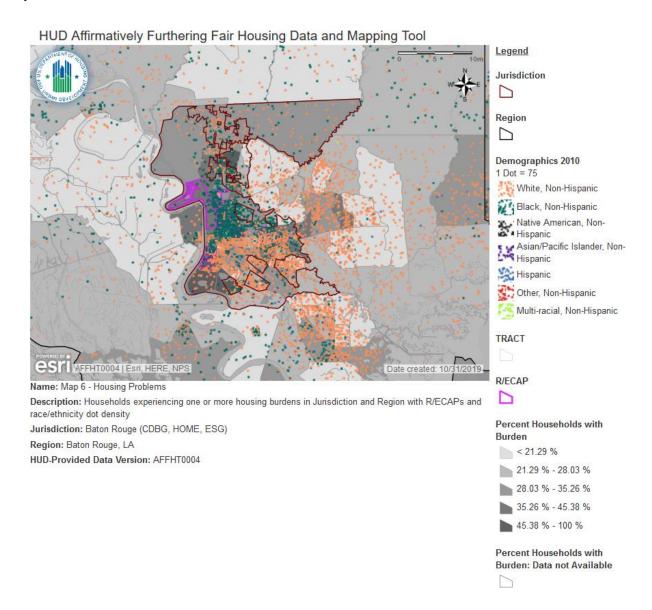
Which areas in the jurisdiction and Region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

In the City of Baton Rouge, as of April 2019, a two-bedroom apartment rents for \$1,096 per month¹². Rents have risen in recent years in the city, but not very drastically, and they tend to fluctuate throughout the year. Rents in the city of Baton Rouge are generally higher than they are for the region.¹³

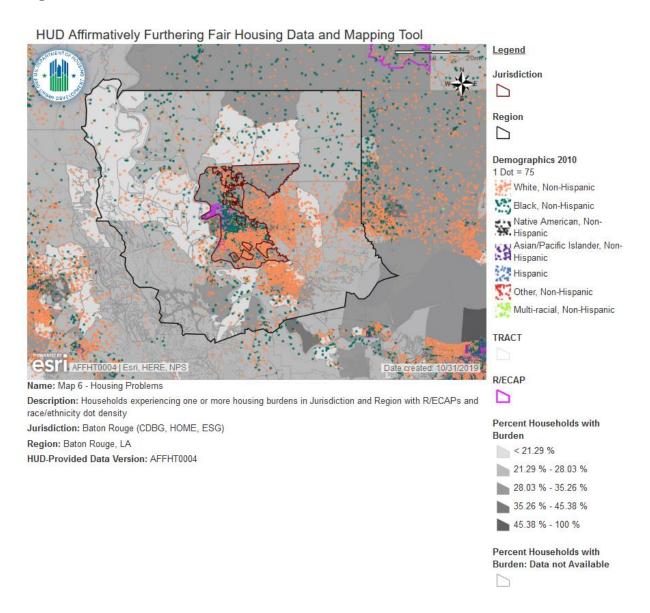
 $^{^{12}\,\}underline{\text{https://www.rentjungle.com/average-rent-in-baton-rouge-rent-trends/}}$

¹³ https://www.rentdata.org/states/louisiana/2018

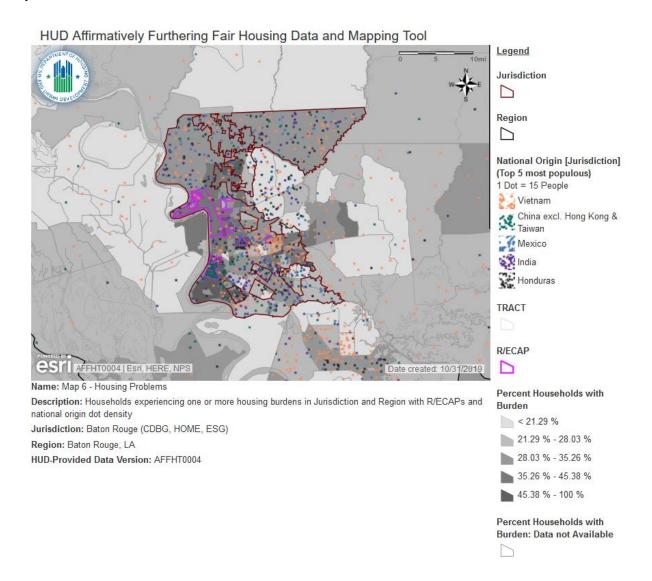
Map 55: Households with Disproportionate Housing Needs by Race/Ethnicity, Baton Rouge Jurisdiction



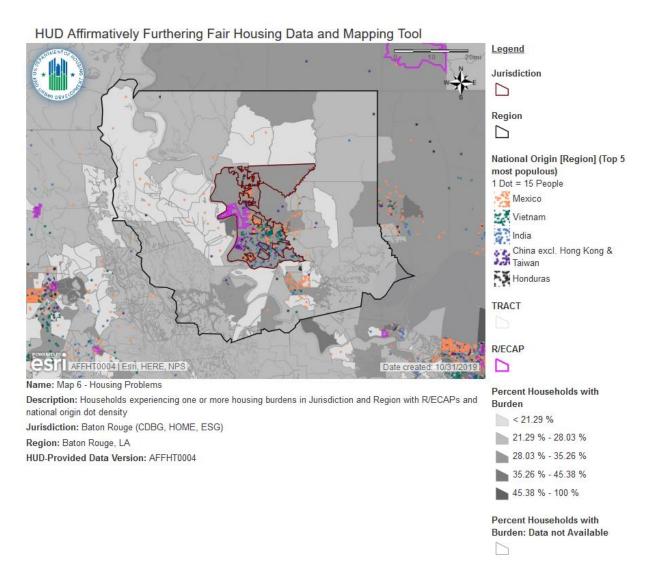
Map 56: Households with Disproportionate Housing Needs by Race/Ethnicity, Baton Rouge Region



Map 57: Households with Disproportionate Housing Needs by National Origin, Baton Rouge Jurisdiction



Map 58: Households with Disproportionate Housing Needs by National Origin, Baton Rouge Region



While housing problems are endemic throughout the jurisdiction, some areas are more affected than others, especially the northern half of the jurisdiction, along with the areas along the Mississippi River. R/ECAPs also tend to have relatively higher rates of housing problems, including by Istrouma, Melrose Place, and the Louisiana School for the Deaf. Baton Rouge has a stark line of segregation extending east to west through the middle of the city, and Black residents (who are more populated along the north half of the line) tend to live in areas with higher rates of housing problems.

Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and Region.

Table 20: B25003: TENURE - Universe: Occupied housing units 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	86,241	+/-1,223
Owner occupied	42,337	+/-1,046
Renter occupied	43,904	+/-1,281

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	167,188	+/-1,340
Owner occupied	98,239	+/-1,365
Renter occupied	68,949	+/-1,681

Table 21: B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is White alone, not Hispanic or Latino

2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	36,108	+/-1,044
Owner occupied	21,984	+/-725
Renter occupied	14,124	+/-790

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	83,973	+/-977
Owner occupied	59,292	+/-960
Renter occupied	24,681	+/-1,024

 $\label{thm:condition} \textbf{Table 22: B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Black or African American alone \\$

2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	43,709	+/-983
Owner occupied	17,755	+/-724
Renter occupied	25,954	+/-1,067

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	71,001	+/-1,084
Owner occupied	33,235	+/-935
Renter occupied	37,766	+/-1,311

Table 23: B25003D: TENURE (ASIAN OR PACIFIC ISLANDER ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Asian alone 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	2,425	+/-297
Owner occupied	1,264	+/-209
Renter occupied	1,161	+/-255

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	4,311	+/-288
Owner occupied	2,624	+/-223
Renter occupied	1,687	+/-265

Table 24: B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Hispanic or Latino 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	2,825	+/-411
Owner occupied	736	+/-185
Renter occupied	2,089	+/-360

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	5,752	+/-463
Owner occupied	2,046	+/-325
Renter occupied	3,706	+/-432

Table 25: B25003C: TENURE (AMERICAN INDIAN AND ALASKA NATIVE ALONE HOUSEHOLDER) – Universe: Occupied housing units with a householder who is American Indian and Alaska Native alone 2013-2017 American Community Survey 5-Year Estimates

	Baton Rouge city, Louisiana	
	Estimate	Margin of Error
Total:	319	+/-141
Owner occupied	215	+/-112
Renter occupied	104	+/-93

	East Baton Rouge Parish, Louisiana	
	Estimate	Margin of Error
Total:	492	+/-169
Owner occupied	307	+/-135
Renter occupied	185	+/-131

The proportions of owners to renters varies across race/ethnicity in the City of Baton Rouge. Overall, 49.09% of the city's residents are owners. Higher percentages of White, Asian or Pacific Islander and Native American residents are owners, at 60.88%, 52.12% and 67.40% respectively, whereas lower percentages of Black and Hispanic residents are owners, at 40.62% and 26.05% respectively. Similar disparities persist across East Baton Rouge Parish though homeownership is slightly higher for all groups at the parish level due to the lower prevalence of rental housing and

housing types—like apartments—that are more likely to be renter-occupied outside of the City of Baton Rouge.

Additional Information

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.

American Community Survey data suggests that 43.8% of the City of Baton Rouge's population spends less than 20.0% of their household income on rent, whereas 29.5% of the population spend 30% or more of their household income on rent. This data suggests that some parts of the population are significantly more cost-burdened than others.

Homelessness

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.

The Point-In-Time (PIT) count measures the number of homeless people living in the city at a given moment. The latest PIT count was taken in January of 2019 by the Louisiana Balance of State Continuum of Care (LA BOSCOC) and counts 353 homeless individuals in the Baton Rouge region. A disproportionate share of homeless individuals had disabilities including 82 with substance abuse issues, 76 with mental health issues, 57 with physical disabilities, 28 with chronic health conditions, 11 with developmental disabilities, and four with HIV or AIDS. 21 homeless individuals were domestic violence victims. A large majority of homeless individuals (68.3%) were Black.

C. Publicly Supported Housing Analysis

Publicly Supported Housing Demographics

Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

Table 26 provides demographic information on residents living in publicly supported housing in the Baton Rouge jurisdiction as well as the broader region. Demographic statistics are broken down by race and ethnicity, in addition to four housing types: public housing, project-based Section 8, other multifamily housing, and the housing choice voucher (HCV) program.

Baton Rouge

Across the four housing types, the largest number of White households (182) live in project-based section 8, followed by Other Multifamily (103). By contrast, the largest number of Black households (2,436) live in Housing Choice Voucher (HCV) units, followed by project-based section 8 (1,206). Over half of Hispanic households (147) are in public housing, followed by HCVs (120). Only 10 total Asian or Pacific Islander households are in any of the four publicly supported housing types.

Black households are the predominant residents of all four housing types, making up well over half of households in each case. Almost 94% of HCV households in the city of Baton Rouge are Black, with Hispanics comprising the next largest share (4.61%). Blacks are 86% of project-based section 8 and 82% of public housing. White households make up 13% of project-based section 8, while Hispanics comprise just under 17% of public housing households in the city.

Region

According to Table 26, only HCV households are present in the region outside of the jurisdiction of Baton Rouge, whereas all units of public housing, project-based section 8 and other multi-family housing are in the jurisdiction. There are an additional 117 White HCV units outside of the jurisdiction (159 total in the region). Similarly, there are close to 1,500 additional Black HCV households in the region but outside of the jurisdiction (3,918 total in the region). Finally, there are 53 additional HCV units outside of Baton Rouge jurisdiction (173 total in the region).

Blacks still make up the predominant share of HCV households in the region; just over 92% of Housing Choice Voucher households are headed by Blacks, followed by about 4% for both Whites and Hispanics. The shares for the other three housing types are unchanged from the jurisdiction.

Table 26: Publicly Supported Households by Race/Ethnicity								
(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	10	1.14%	723	82.16%	147	16.70%	0	0.00%
Project-Based Section 8	182	13.01%	1,206	86.20%	10	0.71%	1	0.07%
Other Multifamily	103	30.84%	222	66.47%	4	1.20%	5	1.50%
HCV Program	42	1.61%	2,436	93.58%	120	4.61%	4	0.15%
Total Households	55,032	47.47%	52,361	45.16%	3,402	2.93%	3,519	3.04%
0-30% of AMI	7,015	31.79%	13,640	61.81%	637	2.89%	464	2.10%
0-50% of AMI	10,369	27.51%	23,460	62.23%	1,166	3.09%	883	2.34%
0-80% of AMI	17,414	30.91%	33,495	59.46%	1,663	2.95%	1,608	2.85%
(Baton Rouge, LA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	10	1.14%	723	82.16%	147	16.70%	0	0.00%
Project-Based Section 8	182	13.01%	1,206	86.20%	10	0.71%	1	0.07%
Other Multifamily	103	30.84%	222	66.47%	4	1.20%	5	1.50%
HCV Program	159	3.73%	3,918	92.02%	173	4.06%	7	0.16%
Total Households	183,075	61.87%	96,893	32.74%	7,659	2.59%	4,725	1.60%
0-30% of AMI	18,353	43.11%	21,953	51.57%	1,028	2.41%	589	1.38%
0-50% of AMI	29,583	38.41%	39,068	50.72%	2,322	3.01%	1,029	1.34%
0-80% of AMI	54,717	44.73%	56,753	46.40%	3,335	2.73%	1,927	1.58%

Note 1: Data Sources: Decennial Census; APSH; CHAS; Note 2: Numbers presented are numbers of households not individuals; Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Baton Rouge

Black households are consistently overrepresented in publicly supported housing—regardless of housing type—relative to the total population of Black households in the jurisdiction. Although black households account for only 45.16% of total households in the city, they occupy between 66.47% and 93.58% of the different types of publicly supported housing. Black representation in public housing (82.1%), project-based section 8 (86.20%) and HCVs (93.58%) is about (or more than) double their share of total households), whereas they are also considerably over-represented in Other Multifamily units as well (66.47%). Hispanics are the only other race/ethnic group to be over-represented in any of the four housing types: whereas Hispanics comprise only about 3% of total households, they make up 16.7% of public housing households and 4.61% of HCV units. White and Asian/Pacific Islanders are under-represented in all four types of publicly supported housing relative to theirs shares of total households in the jurisdiction.

Black households are also disproportionately represented among income eligible households for publicly supported housing, defined as households with incomes between 0% and 80% of the area median income (AMI). While Black households comprise 45.16% of total households in the jurisdiction, they account for 59.46% of households eligible for publicly supported housing. Yet relative to their proportion of income-eligible households, Black households are also overrepresented among households actually residing in a form of publicly supported housing; again, Black households occupy between about 67% and 94% of publicly supported housing. In contrast, whereas White households encompass 47.47% of total households in the jurisdiction, only 30.91% of White households are income-eligible for publicly supported housing and similar or smaller proportions of White households actually reside in a form of publicly supported housing (occupying between 1.14% and 30.84% of publicly supported housing types). The percentages of income-eligible Hispanic households (2.9%) and Asian/Pacific Islander households (2.85%) are proportional to their shares of total households in the jurisdiction.

Region

Similar trends pertain regionally. Black households make up an even smaller share (32.74 percent) of total regional households, and so are again over-represented for all four types of publicly supported housing (occupying between 66.47 percent and 92.02 percent). Hispanics again are over-represented in both public housing and HCVs relative to total household in the region, and Whites and Asian/Pacific Islanders are under-represented for all four types.

Black households are the only race/ethnicity that are over-represented among income-eligible households, relative to total households at the regional level. Whereas 46.40 percent of Black households are eligible for publicly supported housing at the regional level, Black residents as noted above, only account for about 33 percent of all regional households. Furthermore, Black residents are over-represented in each of the publicly supported housing types relative to income-eligible households. By contrast, White residents are considerably under-represented regionally in income-eligible households: they comprise only 44.73 percent of eligible households versus 61.87 percent of all households. Hispanics and Asian/Pacific Islander households are proportional to their shares of total households in the region.

Publicly Supported Housing Location and Occupancy

Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

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 in the jurisdiction and region

Public Housing

Public housing developments are concentrated in central and south-western neighborhoods of Baton Rouge that border or are near to the Mississippi River. These neighborhoods are predominantly Black (see Map 1), confirming the demographic analyses in the previous section that found Black households representing the majority of public housing residents. Two of seven public housing developments in Baton Rouge are in R/ECAPs and another three are just outside R/ECAPs.

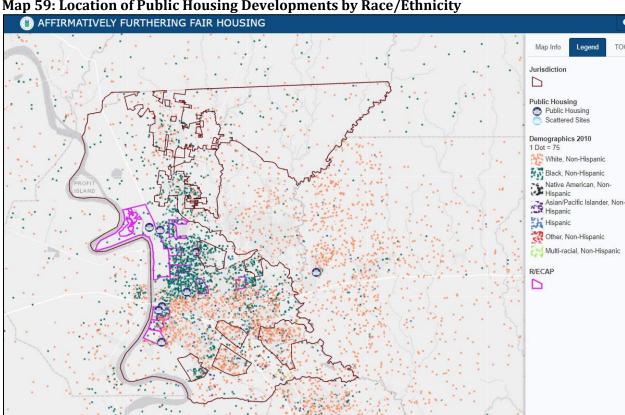
Public housing developments where the majority of households are households with children are comprised of predominantly Black households and are also located in predominantly Black neighborhoods ¹⁴. On average, public housing developments in which more than 50% of households are households with children are located in neighborhoods where the racial composition is 88% Black. Of these developments, the average neighborhood poverty rate is 38%, compared to a 19% poverty rate for the parish as a whole. ¹⁵

Two public housing developments have substantial shares of elderly residents: Turner Plaza (39.2%) and Sharlo Terrace (38.3%). Turner Plaza is located on the border of two census tracts. The census tract on its south side stretches across Government St. into a majority white neighborhood, while the tract to the north has a racial composition that is 98% Black and a poverty rate of 42%. Sharlo Terrace is located in a tract that is 31% Black or Hispanic and with a poverty rate of 49%. Each of these two developments also have shares of disabled residents of over 85%, while no other development has even 15% of disabled residents. 16

¹⁴ Neighborhoods are here defined as Census tracts.

¹⁵ Poverty Status in the Past 12 Months, ACS 2017, 5-year Estimates

¹⁶ Data on elderly and disabled residents provided by the East Baton Rouge Parish Housing Authority.



Map 59: Location of Public Housing Developments by Race/Ethnicity

Project-Based Section 8

Project-based section 8 developments are predominantly located in central and southwestern tracts in Baton Rouge, again in neighborhoods with high shares of Black residents. Several projectbased section 8 developments are located in locations with higher percentages of Whites, however. Six of fifteen project-based section 8 developments are in R/ECAPs.

Project-based section 8 developments where the majority of households are households with children are comprised of predominantly Black households and are also located in predominantly Black neighborhoods. On average, project-based section 8 developments in which more than 50% of households are households with children are located in neighborhoods where the racial composition is 92% Black. Of these developments, the neighborhood poverty rate is as high as 54%. On average, project-based section 8 developments where the majority of households are households with children are located in neighborhoods with a poverty rate of 39%.

There are only two project-based section 8 developments in which at least 50 percent of units are headed by a disabled person.¹⁷ Baton Rouge Residential Center is 91 percent disabled, and is located in a neighborhood that is 46 percent White and 49 percent Black. By contrast, Elm Street Apartments is 81 percent disabled, and is located in a tract that is 92 percent Black. There are six developments in which a majority of heads of households are elderly (at least 62 years of age): Villa St. Francis, Catholic-Presbyterian Apartments, Oak Park Plaza Apartments, Alexander-Harvey Homes, Sharlo Terrace II Apartments, and Elm Street Apartments. These developments are in tracts

¹⁷ Data from 2018 HUD Picture of Subsidized Housing database.

that are over 73 percent Black. Only Sharlo Terrace II is in a neighborhood that is majority White. The other five developments are in tracts ranging from about 66 percent to 92 percent Black. Map 60: Location of Project-Based Section 8 Developments by Race/Ethnicity AFFIRMATIVELY FURTHERING FAIR HOUSING Map Info Jurisdiction

White, Non-Hispanic Black, Non-Hispanic Native American, Non-Asian/Pacific Islander, Non-ASian. . Hispanic Mar, Non-Hispanic Multi-racial, Non-Hispanic R/ECAP D

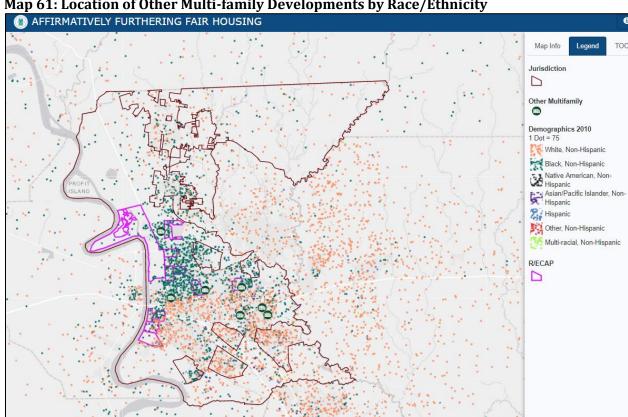
Other Multifamily Housing

Other Multifamily housing developments are located in different types of neighborhoods. Four developments are located in neighborhoods with high shares of Black residents (see map 3). One development (Dumas House) is located in a R/ECAP. However, three other developments are located in less racially segregated parts of Baton Rouge, and one (Baton Rouge New) is located in a majority White tract. These trends are consistent with the observation above that white families make up a substantial share of Other Multifamily households.

On average, Other Multifamily developments are located in neighborhoods that are 54 percent Black and 37 percent white, and that have poverty rates of 25 percent. None of the current developments serve families with children.

Two Other Multifamily developments are comprised of 100 percent disabled households¹⁸: Br New Community Homes, Inc. and Br Rehab Community Homes, Inc. These developments are located in a census tract that is 74 percent White. The Other Multifamily developments that have 100 percent elderly residents are: Assisi Village, Calais House, Chateau Louise, The Dumas House, and Westminster Scotlandville. The other developments have fewer than 50 percent elderly households. These developments are in census tracts that are on average 74 percent Black.

¹⁸ Data from 2018 HUD Picture of Subsidized Housing database.



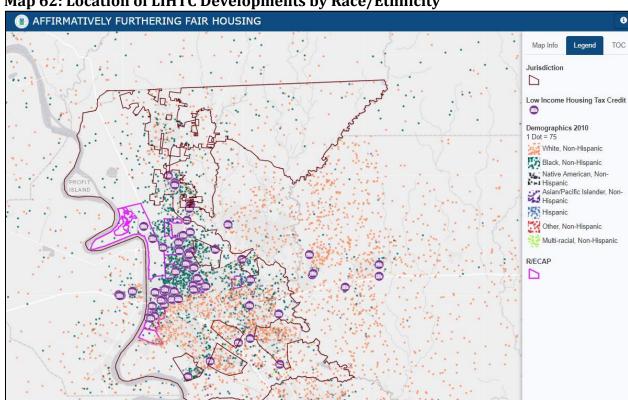
Map 61: Location of Other Multi-family Developments by Race/Ethnicity

Low Income Housing Tax Credit (LIHTC)

LIHTC developments are predominantly located in central and southwestern neighborhoods in Baton Rouge. These neighborhoods are predominantly Black, and quite a few are also located in R/ECAP tracts. Only a few developments are located in southeastern neighborhoods that are less racially segregated. On average, LIHTC developments are located in neighborhoods that are 78 percent Black, 16 percent White, and have poverty rates of 34 percent.

According to HUD's publicly available LIHTC database there are two developments with low income units targeting the elderly population: St. Theresa Apartments and Melrose Peppermill II.¹⁹ Both of these developments are located in tracts that are over 90 percent Black.

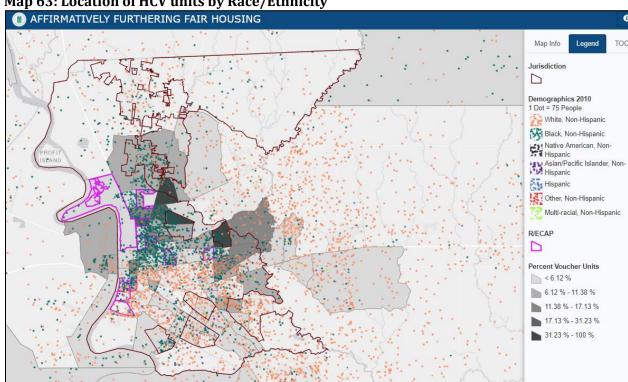
^{19 &}lt;a href="https://www.huduser.gov/portal/datasets/lihtc.html">https://www.huduser.gov/portal/datasets/lihtc.html



Map 62: Location of LIHTC Developments by Race/Ethnicity

Housing Choice Vouchers (HCV)

Housing Choice Vouchers are highly concentrated in central Baton Rouge, which are also neighborhoods with predominantly Black residents (see map 5). This finding also confirms the demographic analyses in the previous section that found Black households represent the majority of HCV residents.



Map 63: Location of HCV units by Race/Ethnicity

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 in the jurisdiction and region?

Table 27 shows the number of publicly supported housing units located in racially/ethnically concentrated areas of poverty (R/ECAPs) and non-R/ECAPs in Baton Rouge. These statistics are broken down by race/ethnicity and other protected characteristics (family, elderly, and disability status), as well as the four housing types.

Public Housing

The racial/ethnic distribution of public housing households is almost identical between those living in R/ECAP tracts and non R/ECAP tracts (see table 27). For instance, 82.9% of public housing households in R/ECAP tracts are Black while 81.4% in non-R/ECAP tracts are Black. The share of public housing households that are Hispanic is only slightly lower in R/ECAP tracts (14.6 percent) than in non-R/ECAPs (18.1 percent). There are no meaningful differences between R/ECAP and non-R/ECAP tracts in the shares of public housing households that are families with children, elderly, or disabled.

Project-Based Section 8

The share of project-based section 8 households that are Black is higher in R/ECAP tracts than in non-R/ECAP tracts (90.2 percent versus 83.6 percent). Conversely, the share of project-based section 8 households that are White is lower in R/ECAPs than in non-R/ECAPs (9.8 percent versus 15.1 percent). Furthermore, the share of project-based section 8 households that are families with children is much higher in R/ECAP neighborhoods (50.6%) than in non-R/ECAPs (29.9 percent).

Only 31 percent of project-based section 8 households in R/ECAPs are of elderly status, whereas 50.4 percent in non-R/ECAPs meet this criterion. Finally, 15.9 percent of project-based section 8 households in R/ECAPs are of disability status, whereas this share is 23.5 percent in non-R/ECAPs.

Other Multifamily Housing

Black households occupy a larger share of Other Multifamily housing units in non-R/ECAP tract (67.8 percent) than in R/ECAP tracts (60.3 percent). White households make up a slightly higher share of Other Multifamily units (31.5 percent) in non-R/ECAPs than in R/ECAPs (27.6 percent). Conversely the share of Other Multifamily households that are Hispanic is higher in R/ECAP tracts (6.9 percent) than in non-R/ECAPs (0.0 percent). Similarly, the Asian share is higher in R/ECAPs (5.2 percent) than in non-R/ECAPs. Furthermore, 100 percent of Other Multifamily units in R/ECAPs are of elderly status, whereas this share is a bit lower (89.4 percent) in non-R/ECAPs. Finally, whereas 0.0 percent of Other Multifamily units in R/ECAPs are of disabled status, this share reaches 7.6 percent in non-R/ECAPs.

Housing Choice Voucher (HCV) Program

The racial/ethnic distribution of Housing Choice Voucher households is almost identical between those living in R/ECAP tracts and non-R/ECAP tracts. For instance, 95.7% of public housing households in R/ECAP tracts are Black while 93.9% in non-R/ECAP tracts are Black. There are no meaningful differences between R/ECAP and non-R/ECAP tracts in the shares of public housing households that are families with children, elderly, or disabled.

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.

Table 28 shows the racial/ethnic composition of developments for each housing type (public housing, project-based section 8, and other multifamily housing) in Baton Rouge.

Public Housing

Public housing developments do not reveal significant inter-development racial disparities; Black households occupy the majority of units for every public housing development included in the HUD provided data. Hispanic households are the next most likely racial group to occupy public housing units but are still far less represented than Black households in public housing across all public housing developments in Baton Rouge. At least 70 percent of units are households with children in five of the seven developments, whereas Turner Plaza only has children in 1 percent of its households.

Project-Based Section 8

Black households occupy at least 50 percent of units in all project-based section 8 developments in Baton Rouge. In 10 of the 14 developments for which HUD provides racial data, Black households make up at least 80 percent of households. White households comprise under 15 percent of units in all but four project-based section 8 developments: Baton Rouge Residential Center (42 percent), Catholic-Presbyterian Apartments (49 percent), Sharlo Terrace II Apartments (35 percent), and Villa St. Francis (39 percent). However, Baton Rouge Residential Center only has 12 total units, so the racial distribution of this development may be affected by its smaller size. Ten developments have data on the presence of children. Of these, only three developments have less than 50 percent

of units without children: Catholic-Presbyterian Apartments (1 percent), Alexander-Harvey Homes (1 percent), and Sharlo Terrace II Apartments (5 percent).

Other Multifamily Housing

The demographic composition of Other Multifamily housing developments in Baton Rouge is shared more evenly across racial and ethnic groups. For instance, two developments have a majority of White households: Br New Community Homes (100 percent) and Br Rehab Community Homes (73 percent). The other five developments with racial information are majority Black, but with higher shares of White households than is observed for the other housing types. It is important to note, however, that multifamily housing developments are smaller in unit size relative to other housing types. Therefore, greater variance in demographic composition may simply be attributed to a difference of a few units that can significantly alter the development's overall composition due to the small unit size.

Provide additional relevant information, in any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

This will be answered after the completion of the public participation process.

Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, 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.

Public Housing

All public housing developments in Baton Rouge are comprised of at least 70 percent Black households and in nearly all cases the demographics of the surrounding area matches that of the developments. Sharlo Terrace is the one exception: the development is 85 percent Black households but is located in a tract that is 59 percent White and 26 percent Black. As noted above, Sharlo Terrace (and Turner Plaza) have substantial shares of disabled and/or elderly residents. The other six developments are all located in or sit on the edge of census tracts that are least 75 percent Black, and three (Monte Sano, Zion Terrace, and Willow Creek) are found in tracts that are over 90 percent Black. Turner Plaza also sits on the edge of a census tract that is 98% Black. All developments except Turner Plaza and Sharlo Terrace have children in at least 70 percent of their households.

Project-Based Section 8

There are several project-based section 8 developments that have demographics that differ from their surrounding neighborhoods. Of the households at Sharlo Terrace II Apartments, 64 percent are Black and 35 percent are White. However, this development is located in a tract that is 59 percent White and only 26 percent Black. Sharlo Terrace only has children in 5 percent of its units. Households at Catholic-Presbyterian Apartments are evenly split between Black and Whites, but the neighborhood has a higher share of Black residents (66 percent). Villa St. Francis is similarly

located in a tract with a higher share of Blacks than live in the development. Finally, 100 percent of the households in two developments—Elm Grove Gardens and Holiday Acres—are Black, but are located in neighborhoods that are about 85 percent Black.

Other Multifamily Housing

The demographics of Other Multifamily developments mostly track the locations they are located in, with a few differences. Assisi Village is closely split between White and Black households (46 percent White and 54 percent Black), but is located in a Census tract that is 73 percent Black. Chateau Louise is also in a tract that has a higher share of Black residents than reside in the development itself. Finally all of the households in Br New Community Homes are White, but the development is located in a tract that is 74 percent White and 18 percent Black.

Disparities in Access to Opportunity

Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other 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.

School Proficiency

School proficiency is highest in the southwestern and northwestern tracts of Baton Rouge, as well as some sections in the northeastern end of the jurisdiction. Public housing developments appear to be located in neighborhoods that score both high and low on proficiency. Three public housing developments are located in those high-performing southeastern tracts. The other four public housing developments appear located in tracts scoring on the lower end of the school proficiency index (scores approximately 30-50). Other multifamily developments are mostly clustered in central or southeastern neighborhoods of the jurisdiction. These areas score predominantly low on the school proficiency index. Project-based section 8 developments are primarily concentrated in centrally located tracts in Baton Rouge which score low on the school proficiency index. However, several developments are located in southwest neighborhoods that score highly on the index. LIHTC developments are mostly located in two areas: central neighborhoods with low-performing schools and southwest tracts with high-performing schools. There are also several LIHTC developments in southeastern tracts with more moderate scores on the school proficiency index.

Job Proximity

Job Proximity varies widely throughout Baton Rouge, without any discernible pattern noticeable across particular sections of the city. Publicly supported housing developments therefore appear to locate in Census tracts that score at all points on this index.

Labor Market Engagement

Labor market engagement is highest in the southernmost neighborhoods of Baton Rouge and lowest in centrally located neighborhoods. Public housing development are located primarily in tracts that score low on the index, with the exception of one development in the southern part of the city. Of the Other Multifamily Housing developments, half are in neighborhoods characterized by low to moderate labor market engagement, while the others are located in southeastern neighborhoods with higher scores. Project-based section 8 developments are located almost exclusively in neighborhoods with low labor market engagement. Similarly, LIHTC developments

are also mostly located in tracts in central Baton Rouge with low labor market engagement, but several developments are in southern parts of the city that score higher. Finally, HCVs are also concentrated in places that have low labor market engagement.

Transit Trips and Low Transportation Costs

The Transit Trips index shows little variation over most of the neighborhoods in Baton Rouge, taking predominantly moderate to low values in most locations, however several northern tracts take the lowest values on this index in the parish. There appears to be little discernable relationship between location of publicly supported housing and this HUD index in the jurisdiction. Similarly, there also appears to be little spatial variability in the Low Transportation Cost index across neighborhoods in Baton Rouge, although the index values appear to be a bit higher overall than Transit Trips. If anything, Publicly Supported Housing developments appear to be located in areas with low transportation costs.

Low Poverty

The Low Poverty Index indicates that poverty is highest in centrally located neighborhoods of Baton Rouge, as well as several in the southwestern and southeastern sections. Public housing, LIHTC, HCVs and project-based section 8 developments are located in tracts that have among the highest poverty on this index. Other Multifamily developments also are mostly located in tracts with higher poverty rates, with several in tracts with more moderate scores on the index.

Environmental Health

The HUD Environmental Health index shows little variation over most of the neighborhoods in Baton Rouge, taking predominantly low values in most locations. There appears to be little discernable relationship between location of publicly supported housing and this HUD index in the jurisdiction.

Additional Information

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. 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.

This will be answered after the completion of the public participation process.

Table 27 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
	by Publicly	Suppor	ted Hou	sing Pro			T	
					%	%		
	m . 1 "				Asian	Famili		0/ 11
(D , D , IA	Total #	0.4	0,	0.4	or	es	0.4	% with
(Baton Rouge, LA	units	%	%	%	Pacific	with	%	a
CDBG, HOME, ESG)	(occupie	Whit	Blac	Latin	Island	childr	Elderl	disabili
Jurisdiction	d)	е	k	X	er	en	y	ty
Public Housing								
			82.86	14.64			13.38	
R/ECAP tracts	284	2.50%	%	%	0.00%	52.11%	%	31.34%
			81.43	18.06			13.83	
Non-R/ECAP tracts	593	0.51%	%	%	0.00%	50.25%	%	33.73%
Project-based								
Section 8				_				
			90.24				31.02	
R/ECAP tracts	534	9.76%	%	0.00%	0.00%	50.55%	%	15.88%
		15.07	83.64				50.35	
Non-R/ECAP tracts	854	%	%	1.17%	0.12%	29.88%	%	23.49%
Other Multifamily								
-		27.59	60.34				100.00	
R/ECAP tracts	63	%	%	6.90%	5.17%	N/a	%	0.00%
		31.52	67.75				89.35	
Non-R/ECAP tracts	274	%	%	0.00%	0.72%	N/a	%	7.56%
HCV Program								
			95.66				12.34	
R/ECAP tracts	408	0.65%	%	3.47%	0.00%	49.79%	%	21.91%
			93.86				15.48	
Non-R/ECAP tracts	1,804	1.75%	%	4.19%	0.19%	52.75%	%	19.37%

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household, Note 2: Data Sources: APSH, Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Table 28 - Demographics of Publicly Supported Housing Developments, by Program								
	Category Public Housing							
Development Name	PHA Code	PHA Name	Unit s	White	Black	Hispani c	Asia n	Household s with Children
Monte Sano Village	LA003	Housing Authority Of East Baton Rouge	211	0%	81%	18%	N/a	72%
Zion Terrace	LA003	Housing Authority Of East Baton						
Turner Plaza	LA003	Rouge Housing Authority Of East Baton Rouge	198	2%	81%	19% 12%	N/a N/a	72%
Ardenwood Village	LA003	Housing Authority Of East Baton Rouge	172	0%	72%	28%	N/a	74%
Sharlo Terrace	LA003	Housing Authority Of East Baton Rouge	78	9%	85%	6%	N/a	N/a
Riversouth	LA003	Housing Authority Of East Baton Rouge	33	3%	91%	6%	N/a	73%
Willow Creek	LA003	Housing Authority Of East Baton Rouge	14	0%	93%	7%	N/a	85%

Project-Based Section 8								
Development Name	PHA Code	PHA Name	# Unit s	White	Black	Hispani c	Asia n	Household s with Children
Scotland Square								
Apartments	N/a	N/a	175	0%	99%	1%	N/a	85%
Renaissance					100			
Gateway	N/a	N/a	128	0%	%	0%	N/a	61%
Renaissance								
Gateway								
Apartments	N/a	N/a	1	N/a	N/a	N/a	N/a	N/a
Baton Rouge Residential								
Center	N/a	N/a	12	42%	58%	0%	N/a	N/a
Catholic-								
Presbyterian								
Apartments	N/a	N/a	195	49%	50%	1%	1%	1%
Elm Grove					100			
Gardens	N/a	N/a	84	0%	%	0%	N/a	88%
Bayou Ridge					100			
Apartments	N/a	N/a	82	0%	%	0%	N/a	76%
Alexander-								
Harvey Homes								
(Formerly We	N/a	N/a	200	5%	94%	1%	N/a	1%
Elm Street								
Apartments	N/a	N/a	60	12%	87%	2%	N/a	N/a
					100			
Holiday Acres	N/a	N/a	54	0%	%	0%	N/a	76%
Hudson								
Square/Heritag								
e Apartments	N/a	N/a	82	13%	86%	1%	N/a	86%
Oak Park Plaza			1	1				
Apts.	N/a	N/a	100	14%	86%	0%	N/a	N/a
Sharlo Terrace								
Ii Apartments	N/a	N/a	90	35%	64%	0%	1%	5%
Spanish Arms								
Apartments 94	N/a	N/a	123	1%	97%	3%	N/a	54%
Villa St. Francis	N/a	N/a	68	39%	59%	3%	N/a	N/a

Assessment of Fair Housing 2020, East Baton Rouge Parish LA

Other Multifamily Assisted Housing								
Development Name	PHA Code	PHA Name	# Unit s	White	Black	Hispani c	Asia n	Household s with Children
Assisi Village	N/a	N/a	67	46%	54%	0%	N/a	N/a
Baton Rouge Voa Living Center	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Calais House	N/a	N/a	67	26%	73%	0%	2%	N/a
Br New Community Homes, Inc.	N/a	N/a	12	100 %	N/a	0%	N/a	N/a
Br Rehab Community Homes, Inc.	N/a	N/a	12	73%	27%	0%	N/a	N/a
The Dumas House	N/a	N/a	65	27%	58%	8%	6%	N/a
Westminster Scotlandville	N/a	N/a	70	1%	99%	0%	N/a	N/a
N/a	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Chateau Louise	N/a	N/a	60	38%	60%	0%	2%	N/a

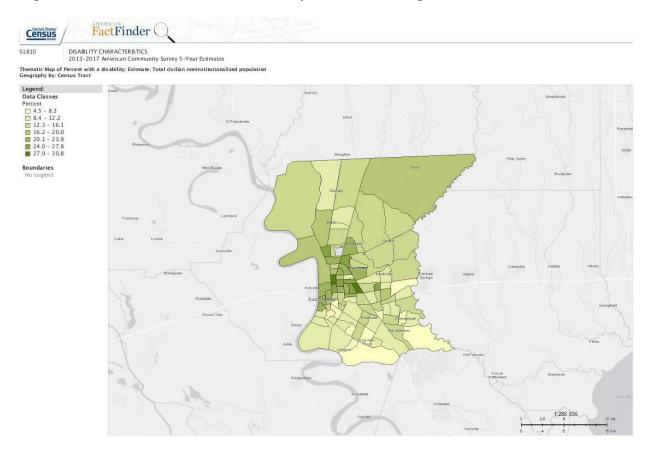
Note 1: For LIHTC properties, this information will be supplied by local knowledge, Note 2: Percentages may not add to 100 due to rounding error, Note 3: Data Sources: APSH, Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation)

D. Disability and Access Analysis

Population Profile

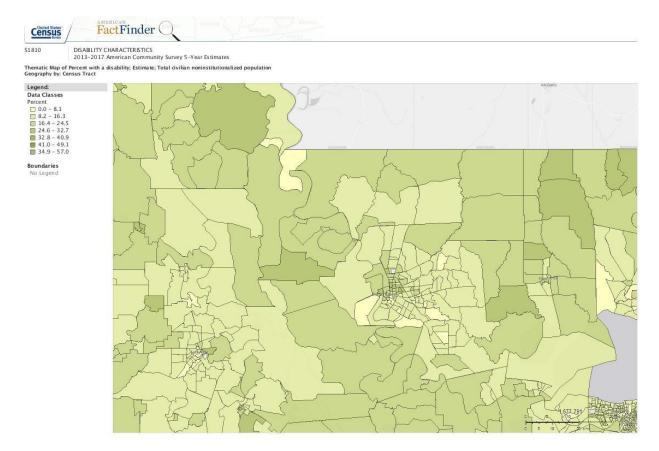
How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Map 64: Share of Residents with a Disability, East Baton Rouge Parish



The map above reflects the percentage of residents of each census tract in East Baton Rouge Parish comprised of persons with disabilities. Areas with darker green shading have higher concentrations of persons with disabilities while those with tan or light green shading have lower concentrations. Census tract-level concentrations vary widely from a low of 4.5% to a high of 30.8%. In general, census tracts in northern Baton Rouge, which is also home to concentrated African American population, tend to have the highest concentrations of persons with disabilities. Census tracts with disproportionately high concentrations of persons with disabilities include multiple R/ECAPs. For example, 30.8% of the population of Census Tract 5, which is a R/ECAP, consists of persons with disabilities. Census Tract 5 is the Istrouma/Dixie neighborhood, bounded by Dayton Street to the north, Acadian Highway to the east, Choctaw Drive to the south, and Scenic Highway to the west. Two other R/ECAPs in North Baton Rouge also have concentrations of persons with disabilities including Census Tract 11.04 or the Smiley Heights/Melrose East neighborhood (26.8% persons

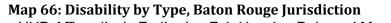
with disabilities) and Census Tract 36.03 or the western half of North Sherwood Forest (26.0% persons with disabilities). South of Downtown Baton Rouge, Census Tract 24 or Old South Baton Rouge (23.9% persons with disabilities), is also a R/ECAP that has a high concentration of persons with disabilities.

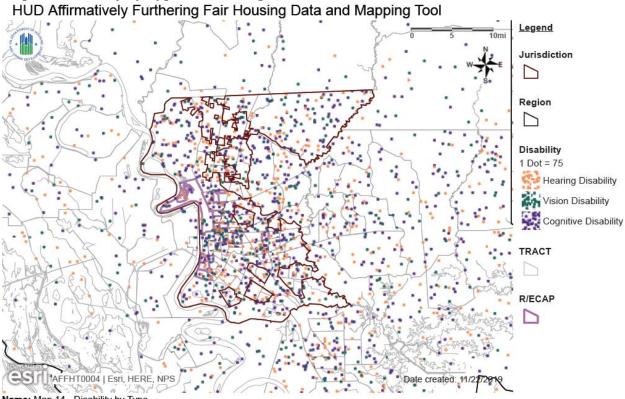


Map 65: Share of Residents with a Disability, Baton Rouge Region

In the mostly rural parts of the region that lie outside of Baton Rouge, concentrations of persons with disabilities tend to fall between the highs of north Baton Rouge and the lows of affluent parts of predominantly White South Baton Rouge. There are a few exceptions to this general trend that have similarly high concentrations of persons with disabilities to those found in Baton Rouge. 29.4% of the population of Census Tract 409.01 in Livingston Parish consists of persons with disabilities. Both of Saint Helena Parish's two Census Tracts have concentrations of over 20% at 21.7% and 23.9% respectively. 26.8% of residents of Census Tract 9524 in Pointe Coupee Parish are persons with disabilities. None of these areas are R/ECAPs, and most are predominantly White. At the Block Group level, there is some concentration of African Americans in parts of Saint Helena Parish that have concentrations of persons with disabilities, but it is not clear that those Block Groups have higher concentrations of persons with disabilities than do adjacent, predominantly White Block Groups. Census Tract 409.01 in Livingston Parish is overwhelmingly White (95.3%).

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.





Name: Map 14 - Disability by Type

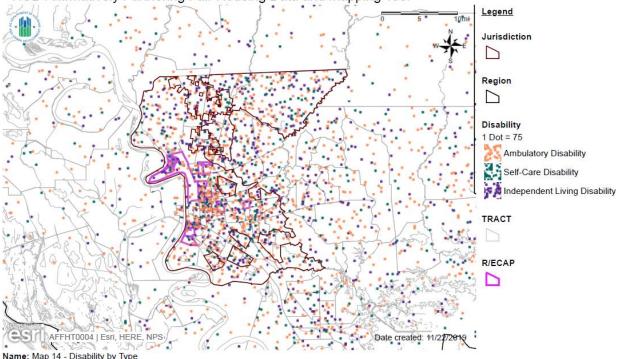
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004





Name: Map 14 - Disability by Type

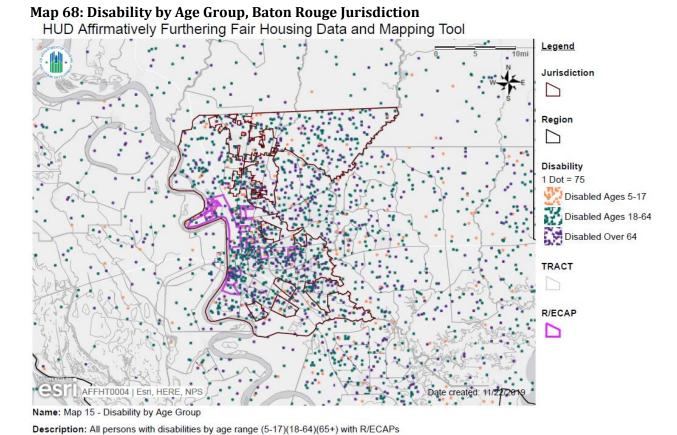
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

Although persons with disabilities in Baton Rouge are concentrated in the northern part of the city, the extent of that pattern is not consistent across all types of disabilities. Among people with hearing disabilities, who are disproportionately likely to be elderly, although there are concentrations in north Baton Rouge, multiple south Baton Rouge Census Tracts also have high concentrations. These include University Acres/Woodstone, in which Census Tract 49 is 88.4% White, and Mayfair, in which Census Tract 40.05 at 41.4% White is a relatively integrated area. Individuals with vision and self-care disabilities are slightly more concentrated in northern Baton Rouge while persons with cognitive, ambulatory, and independent living disabilities are significantly more concentrated in that portion of the city.

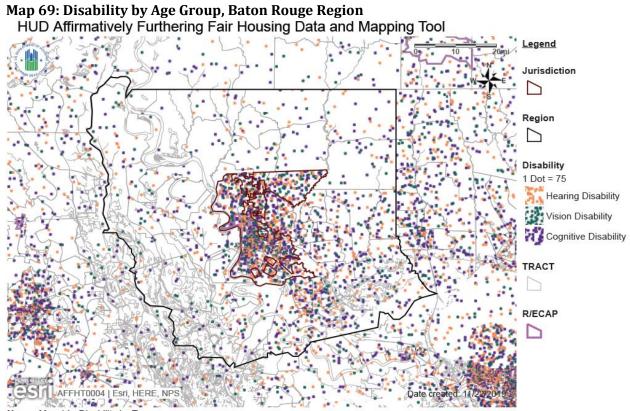


Children and adults ages 18-64 with disabilities are concentrated in northern Baton Rouge; however, elderly individuals with disabilities live in relatively similar proportions across north Baton Rouge and south Baton Rouge. Unsurprisingly, the areas including and immediately surrounding Louisiana State University have relatively small concentrations of elderly persons, both with and without disabilities.

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

HUD-Provided Data Version: AFFHT0004

Region: Baton Rouge, LA



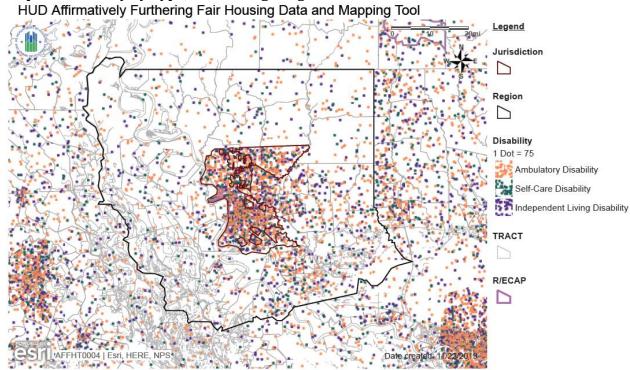
Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

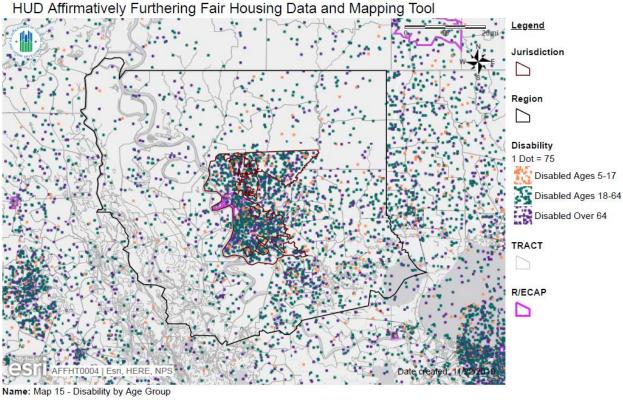
Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Map 70: Disability by Type, Baton Rouge Region

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

Concentrations of persons with specific types of disabilities in the region generally mirror patterns of concentration of persons with disabilities generally. As limited exceptions to that trend, there are also concentrations of persons with cognitive disabilities and ambulatory disabilities in eastern portions of Livingston Parish (located to the north of Census Tract 409.01) that do not otherwise have high concentrations of persons with disabilities. There are also concentrations of persons with ambulatory disabilities in East Feliciana Parish. None of these areas are R/ECAPs. The relevant portion of Livingston Parish is much more heavily White than the region as a whole while East Feliciana Parish is relatively even divided between Black and White population.



Map 71: Disability by Age Group, Baton Rouge Region

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Baton Rouge (CDBG, HOME, ESG)

Region: Baton Rouge, LA

HUD-Provided Data Version: AFFHT0004

In the portions of the region outside of the Jurisdiction of Baton Rouge, concentrations of persons with disabilities in all age ranges tend to mirror concentrations of persons with disabilities generally. Unlike with the Jurisdiction of Baton Rouge, elderly individuals with disabilities are not more integrated throughout the region than other persons with disabilities.

Housing Accessibility

Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes

There are significant shortages of affordable, accessible housing in a range of unit sizes in both the Jurisdiction of Baton Rouge and the broader region. Housing that is both affordable and accessible primarily consists of a portion of units of publicly supported housing developed with federal financial assistance that triggers the applicability of Section 504 of the Rehabilitation Act, Low Income Housing Tax Credit (LIHTC) developments placed in service during or after 1991, and unsubsidized multifamily housing first occupied during the same timeframe that both has rents within payment standards for the Housing Choice Voucher (HCV) program and that is owned and managed by landlords that accept vouchers. It is important to note that the accessibility requirements of Section 504 and those of the Fair Housing Amendments Act of 1988 (which covers multifamily housing more generally) are not identical. A unit that is built to the accessibility standards of the Fair Housing Amendments Act may not have all of the accessibility features of one built or retrofitted to the standards of Section 504. Under Section 504, at least 5% of assisted units must be fully accessible to persons with mobility disabilities (called ambulatory disabilities by the Census Bureau) and at least 2% of assisted united must be fully accessible to people with sensory (hearing and/or vision) disabilities. Additionally, the housing provider, rather than an individual tenant, bears the cost of paying for reasonable modifications that may be necessary to ensure accessibility. The Louisiana Housing Corporation has elected to apply the requirements of Section 504 to developments that receive LIHTC awards through its Qualified Allocation Plan, but it is not clear how long that provision has been in place.

As an initial point, it is clear that there is a dramatic shortage of affordable, accessible housing in the parts of the region outside of the jurisdiction Map _ reflects that there are just four public housing developments, one Project-Based Section 8 development, and two Other Multifamily developments. In addition to this housing, there was a much greater number of LIHTC developments (though still far less than in Baton Rouge, as discussed below), but, in light of the lack of HUD subsidy and without the protections of Section 504, this housing is not as fully accessible. Although Baton Rouge only accounts for 27.5% of the region's population, it accounts for the vast majority of its affordable housing, including its affordable, accessible housing.

Even within Baton Rouge, there is a severe shortage of affordable, accessible housing. In the jurisdiction, there are 17,782 individuals with ambulatory disabilities and just 2,725 hard units of affordable housing assisted through programs that are subject to Section 504. Although not all of those individuals are low-income and some are members of the same households, it is also true that there is incredible need for affordable housing among people, including people with other disabilities, for affordable housing and that Section 504 only requires that 5% of units be accessible. Additionally, people with disabilities in Baton Rouge are disproportionately low-income: 30.5% of persons with disabilities in the city have incomes below the poverty line.

The LIHTC program provides more units than HUD-funded programs, both in Baton Rouge itself and in the broader region, but its contribution is still skewed toward the Jurisdiction of Baton Rouge, is inadequate in the face of the need both locally and regionally, and does not carry as robust accessibility requirements as units covered by Section 504. According to the National Housing Preservation Database, there are 63 LIHTC properties with active subsidies in the City of Baton Rouge. These developments include 5,737 units. Nearly all of these units are in developments that were first occupied during or after 1991, with a portion of the remainder having been recapitalized and substantially rehabilitated after that point. Because information about when the Louisiana Housing Corporation started to apply Section 504 to LIHTC developments is unavailable, it is unclear what proportion of those 5,737 meet more rigorous accessibility standards.

There are far fewer LIHTC developments in the remainder of the region. Ascension Parish has four LIHTC developments with active subsidies, including 268 units. East Feliciana Parish has five developments with a total of 140 units. Iberville Parish has two developments with a total of 144 units. Livingston Parish has eight developments with a total of 448 units. Pointe Coupee Parish has two developments with a total of 60 units. Saint Helena Parish has no LIHTC developments. West Baton Rouge Parish has four developments with a total of 222 units. West Feliciana Parish has two developments with a total of 80 units. The volume of affordable housing that may include some accessible units in the parts of the region outside of the Jurisdiction of Baton Rouge is paltry in comparison to the need.

Lastly, with regard to supply, the American Community Survey does not break down the number of units in multifamily structures that would be covered by the Fair Housing Act by year constructed in a way that allows for a precise determination of the number of units first occupied in 1991 or later. In the City of Baton Rouge, there are 5,162 occupied housing units in structures with five or more units that were built in 2000 or later along with another 7,736 built from 1980 through 1999. If roughly 45% of those latter units were first occupied in 1991 or later, then 3,481 would have been covered by the Fair Housing Act. In East Baton Rouge Parish, there are 10,190 occupied housing units in structures with five or more units that were built in 2000 or later along with another 11,373 build from 1980 through 1999. These totals are inclusive of units within the City of Baton Rouge. Some of these units, however, have rents that are above HCV payment standards, particularly among more newly constructed units. Some of these units are already accounted for in a consideration of LIHTC and other Publicly Supported Housing. Lastly, because Louisiana lacks legal protection against discrimination on the basis of source of income, many of these housing providers do not accept HCV assistance. Some landlords impose additional barriers, such as overly restrictive criminal background screening policies, that prevent their housing from reaching its potential as a source of affordable, accessible housing. These same patterns are pervasive elsewhere in the region with the added wrinkle that there is far less multifamily housing stock. Housing supply is skewed dramatically toward single-family homes that are not subject to any accessibility standards for design and construction.

Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

The distribution of affordable accessible housing in both the jurisdiction and the region matches the distribution of affordable housing more generally. Accordingly, as discussed in the Publicly Supported Housing section of this Analysis, affordable accessible housing is concentrated in segregated, predominantly Black neighborhoods, mostly within Baton Rouge and often within R/ECAPs.

To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 29: Disability by Publicly Supported Housing Program Category

(Baton Rouge, LA CDBG, HOME, ESG) Jurisdiction	People with a Disa	ability
	#	%
Public Housing	289	32.47%
Project-Based Section 8	289	20.53%
Other Multifamily	22	6.23%
HCV Program	529	19.81%

(Baton Rouge, LA) Region		
Public Housing	289	32.47%
Project-Based Section 8	289	20.53%
Other Multifamily	22	6.23%
HCV Program	825	19.01%

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

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affhdata-documentation).

As the table above reflects, persons with disabilities appear to have limited access to the small number of units of Other Multifamily housing in the region, nearly all of which is located in Baton Rouge. Among developments in Baton Rouge, it appears that at least two developments for which demographic data is not available and is not incorporated into the table above are specifically targeted at persons with disabilities. This suggests that the underrepresentation of persons with disabilities in Other Multifamily housing may not be as pronounced as the table indicates. Additionally, the Other Multifamily housing category combines multiple programs with very different structures, requirements, and responsible parties. Accordingly, it is unlikely that the causes of underrepresentation in particular developments are applicable across the multiple different developments.

With respect to the other publicly supported housing programs, the proportion of persons with disabilities is greater than the percentage of the population with disabilities across the board. Representation may merely be in line with the demographics of the income-eligible population of persons with disabilities for the Housing Choice Voucher and Project-Based Section 8 programs. Representation among public housing residents is more robust. The table above does not appear to reflect the demographics of Public Housing and Project-Based Section 8 developments outside of Baton Rouge in its regional data. It is unclear whether the inclusion of persons with disabilities in suburban and rural publicly supported housing is as significant. For voucher holders, access does not appear to vary significantly between Baton Rouge and the remainder of the region.

²⁰ Three Other Multifamily developments in other parts of the region, one in New Roads, one in Albany, and one in Donaldsonville, have few total units, and their demographic data is not reflected in the table above.

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Persons with a wide range of types of disabilities can be at risk of institutionalization, but there is an especially deep history of unjustified segregation of persons with developmental disabilities and individuals with psychiatric disabilities. In Louisiana, there has been significant progress toward advancing community integration for these populations, including in Baton Rouge and the broader region, but many individuals continue to reside in segregated settings.

The State of Louisiana no longer operates large-scale institutions for persons with developmental disabilities. Instead, the continuum of settings ranges from large Intermediate Care Facilities (ICFs) and nursing homes, at the most segregated, to group homes of varying sizes, in the middle, and independent, supported housing or family homes at the most integrated. Some facilities that are classified as ICFs because they provide that level of services under applicable Medicaid regulations are relatively small settings that may identify themselves as group homes with as few as six residents. According to a directory on the Louisiana Department of Health website, there are 47 ICFs with physical addresses in Baton Rouge. Based on the names of these facilities, most of which incorporate "Community Home" or "Group Home" in some manner, it is likely that a large majority of these facilities are group homes with between six and 12 residents. Conservatively, under the assumption that each ICF had just six residents, that would mean that there are 282 individuals with developmental disabilities living in congregate facilities with six or more residents in Baton Rouge. In its negotiated settlements resolving lawsuits alleging the unjustified segregation of persons with disabilities, the U.S. Department of Justice typically does not allow group homes with more than four residents to qualify as integrated housing. Clearly, there is a significant population of persons with developmental disabilities who might benefit from access to fully integrated, permanent supported housing.

Unlike with persons with developmental disabilities, the State of Louisiana's Office of Behavioral Health still operates two large-scale inpatient psychiatric institutions. The Eastern Louisiana Mental Health System, located in Jackson, is both the larger of the two and closer to Baton Rouge. It has 470 beds. Central Louisiana State Hospital in Pineville has 196 beds. Residents of these institutions include both individuals with psychiatric disabilities who have been civilly committed and individuals at various stages of involvement with the criminal justice system. In addition to state hospitals, many individuals with psychiatric disabilities in Louisiana reside in nursing homes. In 2018, the U.S. Department of Justice filed and promptly settled U.S. v. Louisiana, which alleged that the State of Louisiana administered and funded its programs and services for adults with serious mental illness in a manner that unnecessarily segregated them in nursing homes in violation of the Americans with Disabilities Act. The settlement agreement requires the State to take steps to divert adults with serious mental illness from entering nursing homes, to assist them in transitioning to community-based settings, to provide services and supports to ensure long-term stability in the community, and to provide affordable, permanent supported housing and tenantbased rental assistance. In its complaint, the U.S. Department of Justice alleged that at least 3,800 individuals with serious mental illness resided in nursing homes as of 2016, which was 14.5% of all nursing home residents. As of the 2010 Census, there were 1,129 individuals living in nursing facilities in Baton Rouge, and 3,575 (inclusive of those in Baton Rouge) in the broader region. Although data specific to Baton Rouge is not available in the complaint, if a similar proportion of nursing home residents have serious mental illness locally in relation to the statewide percentage,

there would be 164 individuals with serious mental illness living in nursing homes in Baton Rouge and 518 in the region. Although it is likely that some progress has been made since the entry of the settlement agreement, persons with psychiatric disabilities still experience segregation in Baton Rouge and the broader region.

Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

The main targeted housing programs for persons with disabilities in Louisiana are operated by the State and tend to target persons with psychiatric disabilities. Targeted affordable housing options for persons with developmental disabilities are limited although assistance through programs that prioritize persons with disabilities generally may benefit persons with developmental disabilities. The Louisiana Housing Corporation's two primary strategies for increasing permanent supported housing for persons with psychiatric disabilities are its administration of Section 811 Project Rental Assistance and the use of Project-Based Vouchers, often in properties assisted with Low Income Housing Tax Credits (LIHTC). None of the Section 811 units assisted through Louisiana's Fiscal Year 2012 award are located in Baton Rouge or the surrounding region, but there are Project-Based Vouchers in LIHTC developments in the area. Statewide there are 3,000 units of permanent supported housing assisted with either Project-Based Vouchers or Shelter Plus Care. Data on where those units are located is not available. There are no locally-run permanent supported housing programs in Baton Rouge or the surrounding region.

The Louisiana Office for Citizens with Developmental Disabilities (OCDD) administers four Medicaid-funded Home and Community-Based Waivers for persons with developmental disabilities who would qualify for an institutional level of care but are living in the community. The Children's Choice Waiver is available for children while the New Opportunities Waiver, the Supports Waiver, and the Residential Options Waiver serve adults. As of 2018, there were over 9,400 individuals on the waiting list for waiver services across the State of Louisiana. The OCDD recently made a change to serve the waiting list based on the urgency of individuals' needs rather than on a first-come, first-served basis. Although data on the proportion of individuals on the waiting list who are from Baton Rouge or the surrounding region is not available, 11.6% of individuals statewide who attended the OCDD's public discussions about waiver restructuring attended the meeting in the Capital Area Human Services District, which includes Baton Rouge. In addition to the overall shortage of waivers, the Louisiana Council's Advisory Network has included increases to waiver reimbursement rates for particular supportive services as a policy priority. When rates are set too low, that can make it harder for individuals with developmental disabilities to access truly independent housing, instead pushing people into group homes.

For persons with psychiatric disabilities, the Louisiana Office of Behavioral Health and the Capital Area Human Services District provide extensive community-based services, which have been ramped up as a result of the settlement in *U.S. v. Louisiana*. These services include Assertive Community Treatment, which is a robust level of intervention that can help individuals with particularly severe and complex needs maintain stable community integration. Unlike for persons with developmental disabilities, there does not appear to be a significant waiting list for receiving community-based mental health services.

Disparities in Access to Opportunity

To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

Government services and facilities

This Analysis did not reveal examples of inaccessible government services and facilities. The website for the government of the City-Parish has a readily identifiable Accessibility page that is linked to from the website's main page. The Accessibility page includes information about federal accessibility requirements that apply to the site, how to request additional assistance, and what plug-ins and web browsers work with the site. By contract, the East Baton Rouge Parish Housing Authority's website does not include accessibility information. Other local governments in the region vary in the accessibility of their websites. For example, West Baton Rouge Parish has an Accessibility page that is almost identical to that of East Baton Rouge Parish while Ascension Parish has no accessibility page whatsoever.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Large swaths of Baton Rouge have no sidewalks at all, which can make access for difficult for persons with disabilities who are disproportionately low-income and may not have private vehicles. Additionally, public infrastructure, particularly in predominantly Black R/ECAPs in north Baton Rouge, is often in a state of disrepair and may not be fully accessible to persons with disabilities as a result.

Transportation

The Capital Area Transit System (CATS) provides bus service in Baton Rouge. The service itself is somewhat limited in the extent of its routes and the length of its headways, but its website represents that all buses meet Americans with Disabilities Act requirements. CATS provides fare discounts for persons with disabilities, prominently advertises its Americans with Disabilities Act complaint process, and operates paratransit service. In order to make transportation more accessible to persons with disabilities in Baton Rouge, addressing the accessibility of routes from individuals' homes to bus stops and increasing overall services are likely to be more critical than changes to the accessibility of buses.

Proficient schools and educational programs

This Analysis did not reveal specific allegations of violations of civil rights laws protecting students with disabilities in Baton Rouge. Nonetheless, data suggests that there are achievement and school discipline gaps between students with disabilities and those who do not have disabilities. In 2018, Louisiana Department of Education data reflected in-school suspension rates of 22.4% for Black students, 9.0% for Hispanic students, and just 6.9% for White students in East Baton Rouge Parish.²¹ Additionally, the Louisiana Department of Education plays a major role in Baton Rouge

²¹ https://www.louisianabelieves.com/docs/default-source/data-management/2018-discipline-rates-by-subgroup-lea-public-with-state.xlsx?sfvrsn=dbb09a1f_2.

schools through the Recovery School District, and, in 2014, that agency settled a class action law suit alleging systemic violations of the rights of students with disabilities in New Orleans.²²

Iobs

Individuals with disabilities in Baton Rouge face persistent economic barriers, including lack of access to employment and competitive wages. Just 27.4% of the population persons with disabilities age 16 and over in Baton Rouge (and 26.4% in the region) is employed in comparison to 65.0% of persons without disabilities (and 67.3% in the region). For individuals with earnings, there are still disparities. In Baton Rouge, persons with disabilities have median earnings of \$17,842 while persons who do not have disabilities have median earnings of \$24,581. In the region, those figures are \$22,205 and \$34,095 respectively. There are agencies and organizations that work to increase access to employment for persons with disabilities in the area including UpLIFTD, the Volunteers of America's Vocational Day Program for Adults with Developmental Disabilities, and Louisiana Rehabilitation Services' Vocational Rehabilitation Program.

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.

Government agencies in the area, including Baton Rouge's local government and housing authority generally do not have public, easily findable information about how to request reasonable accommodations and accessibility modifications. This is a significant gap. As a result of a 2013 lawsuit, the city-parish has developed a Reasonable Accommodation procedure and application form. The provision, which is a requirement of the Fair Housing Act, seems to only address zoning waivers for group homes. However, there are other uses for a reasonable accommodation to the zoning code that residents of Baton Rouge who have disabilities should be able to request. It is not clear that zoning officials are aware of the range of qualifying requests for reasonable accommodations that protected persons are entitled to make.

Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

There does not appear to be a significant gap in homeownership between households that include persons with disabilities and those that do not in Baton Rouge. According to 2012-2016 CHAS data, 53.3% of household including persons with disabilities own their own homes, and 49.5% of all households do. Thus, households including persons with disabilities are actually slightly more likely to be homeowners than other households. This surface level appearance of equity may, however, mask underlying barriers. Specifically, the higher rate of homeownership among households including persons with disabilities may be the result of the older age of both persons with disabilities and homeowners. A significant share of homeowners with disabilities may have

²² Consent Judgment, P.B. v. White, No. 2:10-cv-04049 (E.D. La. Mar. 25, 2015).

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purchased their homes prior to having a disability. Although this Analysis did not reveal examples of mortgage lending discrimination against persons with disabilities, such practices may exist, and, more to the point, lower levels of employment and lower wages among persons with disabilities are likely to make homeownership more difficult to attain.

Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region

Persons with disabilities experience housing problems at disproportionately high rates based on 2012-2016 CHAS data. Among households including individuals with hearing or vision impairments, 40.1% have one or more housing problems. 40.2% of households including persons with ambulatory disabilities have one or more housing problems. 45.1% of households including persons with cognitive disabilities have one or more housing problems. 40.2% of households including persons with self-care or independent living disabilities have one or more housing problems. By contrast, just 36.1% of households that do not include persons with disabilities have one or more housing problems. This data shows that housing instability is greatest among the categories of persons with disabilities who have also had the highest risk of unjustified institutionalization historically.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

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.

Caused but Unresolved:

There are no current cases in East Baton Rouge Parish filed with HUD that fit this description.

Cases Pending with HUD:

There are currently 6 cases pending with the State Attorney General's office and HUD in East Baton Rouge. The most common basis of discrimination for the East Baton Rouge complaints was disability (3) followed by race (2), and sex (1). Half of the pending cases (2 disability and 1 race) originate from the 70816 zip code, which encompasses the Stevendale and O'Neal neighborhoods. Another two cases (1 race and 1 sex) were filed in zip code 70810 which is home to South Bluebonnet.

Cases Pending in Federal Court:

LaFHAC is also party to complaints, along with 18 other fair housing centers and the National Fair Housing Alliance, against Bank of America, Deutsche Bank, and Fannie Mae for failing to maintain its real estate owned (REO) properties in neighborhoods of color in New Orleans and Baton Rouge. The active REO cases are NFHA, et. al. v. Bank of America, NFHA, et. al. v. Deutsche Bank, and NFHA, et. al. v. Fannie Mae.

Describe any state or local fair housing laws. What characteristics are protected under each law?

The Louisiana Equal Housing Opportunity Act is certified by HUD as substantially equivalent to the federal Fair Housing Act. Like its federal equivalent, the statute protects individuals in seven protected classes. The Louisiana Attorney General's office is the only Fair Housing Assistance Program funded agency in the state.

Though not a part of the Louisiana Equal Housing Opportunity Act, the state did pass housing protections for victims of domestic violence in 2015. The Louisiana Violence Against Women Act (LaVAWA) provide four key protections:

- Anyone in need of emergency assistance can contact the police without penalty.
- Survivors of domestic violence can no longer be evicted because of the violence of an abuser.

• Survivors can no longer be denied housing solely on the basis of past abuse. Survivors can now terminate a lease early and move when necessary to ensure their safety.

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.

LaFHAC provides fair housing enforcement, education and outreach, policy advocacy, and foreclosure prevention services throughout the state of Louisiana and is based in New Orleans.

LaFHAC enforcement staff conducts fair housing investigations and provide legal representation to individuals who experience housing discrimination. LaFHAC enforcement staff also routinely conducts testing of the Greater Baton Rouge housing market in order to understand discriminatory trends and identify systemic discrimination. The organization regularly files enforcement actions against individuals and entities engaging in discriminatory practices. Since 2005, LaFHAC has served more than 1,000 individuals and assisted in the recovery of \$5.43 million in monetary relief as a result of its enforcement actions. LaFHAC has also negotiated numerous settlements and consent decrees requiring housing providers or local government entities to comply with fair housing laws.

LaFHAC trains over a thousand people each year about their fair housing rights and obligations through first time homebuyer classes, the annual Fit for a King conference, and talks with students, neighborhood associations, local officials, housing providers, and volunteers. The Center has conducted numerous statewide and local media campaigns to inform consumers and housing professionals of their fair housing rights and responsibilities. LaFHAC has also produced an original children's book, *The Fair Housing Five & the Haunted House*, which is used across the country to teach about fair housing and civil rights.

In addition to LaFHAC, Southeast Louisiana Legal Services (SLLS) also provides some fair housing assistance to clients in the Baton Rouge region. SLLS is the state's largest provider of free civil legal aid to low-income people and operates a housing division which primarily focuses on landlord-tenant law but occasionally does fair housing work as well.

The Advocacy Center, a statewide non-profit that advocates for the human and legal rights of people with disabilities and seniors also assists with fair housing education and enforcement as it relates to persons with disabilities in the Greater Baton Rouge Area.

Additional Information

Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City-Parish does not have a local municipal agency that receives discrimination complaints from East Baton Rouge Parish residents. It also lacks a local code that prohibits housing

discrimination and enforcement mechanisms to combat discrimination at the local level. Because of this, residents rely on state and federal laws, as well as state and federal agencies and LaFHAC for relief. However, East Baton Rouge Parish would benefit from a local anti-discrimination law, a Human Relations Commission, and outreach efforts that are localized and developed with capacity to inform residents about their fair housing rights.

According to the 2010 Analysis of Impediments, The State of Louisiana is responsible for creating a fair housing working group and assisting Baton Rouge with bringing stakeholders together to create a local fair housing system. Since 2010, agencies in Baton Rouge have not heard of any opportunities to participate in the development of any fair housing systems, and residents have continued to struggle with few options for relief from ongoing discrimination.

F. Contributing Factors to Segregation and Discrimination

List and explain the contributing factors that lead to, maintain, and perpetuate segregation and discrimination in the jurisdiction and region.

Location of environmental health hazards

Location of environmental health hazards are a contributing factor to segregation in Baton Rouge. The city is home to a number of chemical plants and industrial polluters; the average chemical industry toxic air releases per job in the Parish was 1,100 as early as the 1990s, compared to the national average of 513.²³ The first chemical plants were built in the 1950s, around the same time that the Louisiana legislature passed a resolution designating industrial zones in the state. These zones were drawn disproportionately around communities of color, placing the burden of chemical toxins in the air on already vulnerable populations.²⁴ As recently as August 2019, the city has continued to allow companies to operate in these unfairly drawn industrial zones—tax breaks were approved for Formosa Plastics Corp. USA, a resin manufacturing plant located just south of Scotlandville, a neighborhood more than 83 percent Black, and just west of Merrydale, a neighborhood more than 90 percent Black.²⁵

Many studies have debated the link between the high concentration of industry in the region and health outcomes, but regardless, Louisiana parishes were in the top ten counties in the nation for bladder cancer and number one in colon and rectal cancers—organs that are all especially vulnerable to industrial toxins. ²⁶ Overall, residents of East Baton Rouge Parish have poorer health outcomes than the average American, with disparities existing within the Parish as well. ²⁷ In the neighborhood of Scotlandville, where 83 percent of residents are Black and 16 percent are White, the median age is 30 and the average life expectancy is 65.4. In nearby Carmel Acres, where 17 percent of residents are Black and 81 percent are White, the median age is 41 and the average life expectancy is 71.2. ²⁸

Baton Rouge is also home to many rivers, creeks, canals, and other smaller waterways, in addition to its location on the Mississippi River. The devastating floods of 2016 made it clear that many communities throughout the parish are located in areas susceptible to flooding. While flooding hit both majority-Black and majority-White areas hard, better resourced, White neighborhoods

²³ https://www.law.georgetown.edu/environmental-law-review/wp-content/uploads/sites/18/2019/05/GT-GELR190016.pdf, p. 464

²⁴ https://www.law.georgetown.edu/environmental-law-review/wp-content/uploads/sites/18/2019/05/GT-GELR190016.pdf, p. 472

²⁵ https://www.nola.com/news/environment/article 7f1c64f8-6fe3-5a5c-9a37-8908bdadbb72.html

²⁶ https://www.law.georgetown.edu/environmental-law-review/wp-content/uploads/sites/18/2019/05/GT-GELR190016.pdf, p. 458

²⁷ http://www.healthybr.com/assets/uploads/docs/2018_CHNA_with_web_version_8-28-18.pdf

²⁸ http://www.healthybr.com/assets/uploads/docs/2018_CHNA_with_web_version_8-28-18.pdf, p. 16-17

recovered much faster. The record-breaking amount of time that the Mississippi River stayed above flood stage in 2019 also raises concerns about flood damage and other associated environmental dangers for the disproportionately poor and Black areas that dot the river in East Baton Rouge Parish.²⁹

Access to financial services

Access to financial services is a significant contributing factor to segregation in Baton Rouge. A resident's ability to access traditional banking services is a large determinant of their ability to rent or own a home. In Baton Rouge, 26 percent of households are classified as either underbanked or unbanked, meaning residents are either completely disconnected from the traditional banking system, or, despite maybe having a relationship with a bank, continuing to rely on alternative financial services instead.³⁰ In Louisiana, Black residents are over five times more likely to be unbanked than White households, and over twice as likely to be underbanked.³¹

Payday lenders are the most common alternative financial service in the state. Payday loans offer easy access to quick cash while charging exorbitant interest rates and fees that trap borrowers in a cycle of debt. Lenders target borrowers without access to traditional sources of credit, and are largely unregulated in Louisiana.³² As of 2011, Louisiana had one of the nation's highest concentrations of payday lenders—an average of one for every 4,800 people. There were 936 payday loan storefronts in the state, more than four times the number of McDonald's restaurants.³³ Payday lenders often outnumber mainstream banks in low-income neighborhoods; ZIP codes in Louisiana with the highest concentration of predatory lenders also had far fewer mainstream banks, and most have much higher average poverty rates compared to ZIP codes with the most banks.³⁴ In East Baton Rouge Parish, the median household income is over \$4,000 higher for those living in "bank neighborhoods" compared with those living in "payday loan neighborhoods."³⁵ Baton Rouge is home to the top ZIP code in the state for the number of payday loan centers; 70806 has 25 payday loan centers and only 8 banks.³⁶ Additionally, there is a clear racial pattern to payday lending—in Baton Rouge, the vast majority of payday loan centers are clustered in or bordering Census tracts that are at least 80 percent African American.³⁷

Location of proficient schools and school assignment policies

Location of proficient schools and school assignment policies are contributing factors to segregation in Baton Rouge. Baton Rouge's schools were operating under a desegregation order, imposed in 1956 after the Brown v. Board of Education ruling. In 1996, the school board moved forward on ending busing, which was the most contentious part of the desegregation plan. Instead, they proposed using magnet schools to attract students to integrated buildings. The court agreed, while also imposing conditions to try and ensure the district maintained equitable access to

²⁹ https://www.uvu.edu/ethics/docs/resources/environmental-injustice-mississippi-case-study.pdf, p. 7

³⁰ https://www.fdic.gov/householdsurvey/2017/2017appendix.pdf, p. 19

³¹ https://www.fdic.gov/householdsurvey/2017/2017appendix.pdf, p. 1

³² https://www.labudget.org/wp-content/uploads/2011/07/Payday-Lenders.pdf, pg. 1

³³ https://www.labudget.org/wp-content/uploads/2011/07/Payday-Lenders.pdf, pg. 1

³⁴ https://www.labudget.org/wp-content/uploads/2011/07/Payday-Lenders.pdf, pg. 4

³⁵ Id.

³⁶ https://www.labudget.org/wp-content/uploads/2011/07/Payday-Lenders.pdf, pg. 5

³⁷ https://www.labudget.org/wp-content/uploads/2011/07/Payday-Lenders.pdf, pg. 10

schools, 38 In 2003, a federal judge lifted the desegregation order. At the time, the school district was 75 percent Black; now, it is 81 percent Black, and 89 percent non-White overall, due in large part to the end of the court order clearing the way for several communities to secede from the city and incorporate their own municipalities.³⁹ One of these communities, Zachary, is overwhelmingly White and is now the highest-performing school district in the state. In 2007, the Central community also seceded, taking a sizable portion of the White students that remained in Baton Rouge. 40 In 2019, residents of the community of St. George voted to leave the city and incorporate their self-drawn boundaries were drawn with precise incisions that coincidentally excluded apartment buildings with a larger share of non-white residents. The city's incorporation is currently tied up in lawsuits, but if it is allowed to incorporate the city of St. George is will be only 12 percent Black and over 70 percent White.41

Within Baton Rouge, Black residents are most heavily concentrated in centrally located neighborhoods with low access to proficient schools, and mostly absent from locations with higher performing schools. White residents are most highly concentrated in north and southwestern neighborhoods with high performing schools.⁴² These disparities have an impact on educational outcomes as well. In Scotlandville, where 83 percent of residents are Black and 16 percent are White, 76 percent of residents have only a high school diploma or less, and 53 percent of residents score basic or below average in literacy. Meanwhile in Shenandoah, an area of Baton Rouge where 18% of residents are Black and 75% are White, 23 percent of residents have only a high school diploma or less, and only 23 percent of residents score basic or below average on literacy. 43

Impediments to Mobility

As noted in the data section, Housing Choice Vouchers (HCV) are highly concentrated in central Baton Rouge, which are also neighborhoods with predominantly Black residents. Such concentration presents a fair housing issue, in particular because Black residents are overrepresented among voucher households in Baton Rouge and the region, in comparison to their presence in the overall population and income-eligible population. This indicates the need to examine EBRPHA programs that may be resulting in concentration, in particular within the administration of the HCV program.

Payment standards: HCV payment standards are currently set at 110% of Fair Market Rent (FMR) throughout EBRHPA's jurisdiction. This means that voucher households are disadvantaged in seeking housing in relatively high-rent areas in the city and region, even if those areas offer increased access to opportunity or to relieve patterns of segregation.

³⁸ https://www.the74million.org/article/left-behind-can-east-baton-rouge-schools-survive-the-breakaway-of-awealthy-majority-white-community/

³⁹ https://www.theatlantic.com/education/archive/2019/05/resegregation-baton-rouge-public-schools/589381/

⁴⁰ https://www.the74million.org/article/left-behind-can-east-baton-rouge-schools-survive-the-breakaway-of-awealthy-majority-white-community/

⁴¹ https://newrepublic.com/article/155369/school-secession-movement-growing-thats-bad-news-integration

⁴² see Map 2, Disparities in Access to Opportunity section

⁴³ http://www.healthybr.com/assets/uploads/docs/2018 CHNA with web version 8-28-18.pdf

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Tenant screening criteria: tenants in project-based voucher (PBV) developments are subject to additional screening criteria that the landlord may choose to apply, in addition to those imposed by HUD. Overly restrictive background screening, for example on the basis of criminal or arrest history, may have a discriminatory impact at particular developments.

Waitlist policies: both the HCV and project-based waitlists are currently closed. EBRPHA maintains separate waitlists for each PBV development, and should assess whether this is likely to have a fair housing impact or if additional affirmative marketing may be needed for individual developments. Public housing waitlists are also site-based and are maintained in chronological order. This may have a fair housing impact on residents who have disabilities or are otherwise challenged in competing for a spot on the waitlist; EBRPHA should consider whether a lottery-based waitlist would enable broader housing choice. EBRPHA does not currently have preferences in its public housing development waitlists. The PHA plan notes, however, that it will apply a "working preference at mixed finance/mixed income properties" which may restrict housing choice for nonworking households.

Quality of Affordable Housing Information Programs

Mobility counseling and other informational resources: EBRPHA currently lacks a dedicated housing mobility program. In addition, EBRPHA is undertaking RAD conversions, but has not yet implemented a Choice-Mobility plan for residents who will become eligible for housing choice vouchers under the RAD requirements. EBRPHA engages in landlord seminars and outreach, and has recognized the need to continue and expand these services.

Site selection policies

The location of subsided housing in the Baton Rouge region presents a fair housing issue, given that with the exception of housing choice vouchers, all forms of subsidized housing captured by the HUD data are located within the Baton Rouge Jurisdiction itself and not elsewhere in the region. This indicates a lack of regional coordination in siting policies as well as overall limitations on where subsidized housing is sited, such that this housing is ultimately concentrated within the Jurisdiction. Siting issues vary somewhat by type of subsidized housing and include both legacy siting issues that should be considered in the context of redevelopment policies (applicable to public housing) and ongoing siting issues (as in the LIHTC program), which in combination indicate the need to achieve better locational balance and to consider policies that would support this. As noted in the data analysis section, public housing developments with family-sized units, in particular, are located in very predominantly Black areas. Project-based Section 8 developments are predominantly located in particular areas (central and southwestern tracts) in Baton Rouge, in neighborhoods with high shares of Black residents, and project-based Section 8 developments, and such developments where the majority of households have children in particular tend to be located in concentrated areas. LIHTC units are also generally located in concentrated areas, with few exceptions.

While Baton Rouge follows general HUD site selection regulatory requirements, as incorporated into its PHA plan, these requirements should be considered a floor, and the current locational balance indicates that a more concerted approach to distribution—in particular of project based Section 8 vouchers—that targets areas of opportunity should be considered. Similarly, public housing redevelopment (including RAD development) should be planned so that any new construction or changes in unit composition do not perpetuate or reinforce the existing patterns of segregation. EBRPHA's current PHA Plan notes that it has sought "approval for up to 20% set aside of its voucher allocation to support PHA new development."

The Housing Authority has received a Choice Neighborhoods grant to redevelop Ardenwood Village (including the areas of Melrose East, Smiley Heights and East Fairfields) and is planning to increase the number of units in that development. This plan will result in temporarily dislocation of residents, requiring the provision of counseling and other services to ensure their rights to return. The housing authority should also take care to guard against fair housing impacts on protected classes, for instance in re-designating unit sizes. The CNI plan includes infrastructure, community, and social service improvements.

Lack of Community Revitalization Strategies

A lack of community revitalization strategies has contributed to the segregation of residents of color in Baton Rouge. A lack of decent jobs and disinvestment in parts of the city has contributed to the concentration of poverty and of people of color in these communities. Efforts to revitalize areas such as north Baton Rouge have been slow to launch. The Baton Rouge North Economic Development District was created in 2015 to help develop economic activity, create job opportunities, and connect the community to Southern University and Baton Rouge Community College but the District only hired its first permanent director in 2018.⁴⁴ Additionally, the North Baton Rouge Economic Opportunity zone program aimed at boosting investment in the neighborhood has had few applications for developments.⁴⁵

However, the North Baton Rouge Economic Development District has recently stabilized and now aims to support revitalization of the Plank Road Corridor. The East Baton Rouge Parish Housing Authority is also implementing a strategy to help revitalize communities. The Housing Authority has launched efforts to redevelop publicly supported housing and is using funding from a Choice Neighborhoods Grant for community improvement initiatives and support services for residents.

Source of Income Discrimination

Source of income discrimination is a significant contributing factor to fair housing issues in East Baton Rouge Parish. Although Housing Choice Vouchers are designed to enable families to access the open housing market, many Housing Choice Voucher holders encounter difficulty when trying to find a landlord who is willing to accept a voucher. Currently, there is no ordinance in any parish or municipality in the Baton Rouge metropolitan area that bans discrimination against HCV holders. There is also no statewide law prohibiting discrimination against tenants with Housing Choice Vouchers in Louisiana.

Availability of Affordable Units in a Range of Sizes

The availability of affordable units in a range of sizes may contribute to disproportionate housing needs. In East Baton Rouge Parish, approximately 4% of renter occupied households are overcrowded (more than one person per room).⁴⁸ This rate is lower than the rate of overcrowding in renter occupied households in the U.S. (6.05%) and Louisiana (4.31%).⁴⁹ The rate of renter overcrowding is higher in all other parishes in the region, with the highest rates in West Feliciana

⁴⁷ https://www.businessreport.com/business/public-housing-baton-rouge-j-wesley-daniels

⁴⁴ https://www.theadvocate.com/baton_rouge/news/article_0de3460a-6dbb-11e9-b464-bb7a66c8feb5.html ⁴⁵ *Id.*

⁴⁶ *Id*

⁴⁸2019 Louisiana Housing Needs Assessment, Region 2: Baton Rouge, Louisiana Housing Corporation at 25 https://www.lhc.la.gov/hubfs/Document%20Libraries/Housing%20Policy%20and%20Data/RLMA2.pdf ⁴⁹ *Id.*

and Point Coupee Parishes.⁵⁰ The rate of overcrowding in renter occupied households in the city and the region is substantially higher than the rate of overcrowding in owner occupied households. This indicates that there may be a lack of affordable rental units in a range of sizes that can accommodate families in outlying parishes.

Availability, type, frequency, and reliability of public transportation

The quality of public transportation is a significant contributing factor to disparities in access to opportunity. The current bus transit system does not adequately serve the sprawling metropolitan area. Little public transportation exists outside of the urban core of Baton Rouge. Baker is the only other city in the parish that has dedicated bus service from the Capital Area Transit System (CATS).⁵¹ CATS has been criticized for providing infrequent, inconvenient, and inefficient service.⁵² There is currently no passenger rail service available in Baton Rouge and there is also little transit service available to Baton Rouge Metropolitan Airport.⁵³

In an effort to resolve some of the problems with service, the Capital Area Transit System (CATS) overhauled its bus routes in February 2019.⁵⁴ This restructuring effort is part of the CATS Service Improvement Plan (SIP) which aims to improve transit by adding service to new areas, providing more direct service to reduce travel times, increasing service hours, and increasing bus frequency.⁵⁵ By implementing the proposed SIP, transit accessibility would increase significantly for residents, particularly low-income residents and residents of color.⁵⁶ CATS is also in the process of developing Louisiana's first Bus Rapid Transit (BRT) line which will link north Baton Rouge with downtown and LSU.⁵⁷

Lack of access to opportunity due to high housing costs

High housing costs contribute to disparities in access to opportunity. Although housing costs in Baton Rouge are relatively low by national standards, the level of rent stress (defined as the percentage of households spending 35% or greater of income on rent and related costs) is quite high.⁵⁸ In East Baton Rouge Parish, 42% of renter households experience rent stress while 27% experience extreme rent stress (spending more than half of household income on rent and related costs).⁵⁹ The level of overall rent stress is the highest of any parish in the region. Rent stress is also high in several other parishes with nearly 36% of renter households in Iberville Parish experiencing rent stress and nearly 34% of renter households in West Baton Rouge Parish experiencing rent stress.⁶⁰ Housing costs can price individuals out of areas that have better access to services and employment opportunities. Housing costs can take up a significant share of income and households that have to spend more of their income on housing have less money available to cover other necessary expenses such as childcare, healthcare, and transportation.

⁵⁰ *Id*.

⁵¹ https://www.theadvocate.com/baton_rouge/news/article_a0b3412e-ca72-11e9-b6d2-6f59d63a37f8.html

⁵² https://www.brla.gov/DocumentCenter/View/1973/Transportation-PDF

⁵³ *Id.* at 18.

⁵⁴ https://www.theadvocate.com/baton_rouge/news/article_bc9fe0f0-3827-11e9-9384-df95c235d7e0.html

⁵⁵ https://www.brcats.com/page/service-improvement-plan

⁵⁶ Id.

⁵⁷ https://www.theadvocate.com/baton_rouge/news/article_5fcadade-0184-11ea-b6e7-dfceed0eb289.html

⁵⁸ https://www.lhc.la.gov/hubfs/Document%20Libraries/Housing%20Policy%20and%20Data/RLMA2.pdf

⁵⁹ *Id.* at 35.

⁶⁰ *Id*.

However, rising vacancies and new construction have helped to bring down apartment rents in recent years.⁶¹ An analysis of rent prices in the most populated cities in the country found that rents declined for studios, one-bedroom units, and two-bedroom units in the Baton Rouge area in 2019.⁶² HUD has also lowered Fair Market Rents for all bedroom sizes in the Baton Rouge metropolitan area for Fiscal Year 2020.⁶³ Declining rents will help ease cost pressures on low-income households.

Location of Employers

The location of employers does not appear to have a major effect on access to opportunity. Employment in the Baton Rouge metropolitan area is relatively centralized. Approximately 70 to 80 percent of the region's workers commute to jobs within East Baton Rouge Parish.⁶⁴ Downtown Baton Rouge is a major employment center with many state and City-Parish government workers. Other major employment areas include Louisiana State University, the Florida Boulevard corridor, the Interstate 10 corridor (including Our Lady of the Lake Regional Medical Center), and Airline Highway. Major industrial areas also serve as employment centers. Downtown Baton Rouge and LSU are located in relatively close proximity to several R/ECAPs.

However, long-term employment trends show that the concentration of jobs near downtown Baton Rouge is declining. Overall, the number of jobs in the region has increased but East Baton Rouge Parish's share of regional jobs declined from 66% in 2000 to 62% in 2018, as employment has grown more in outlying areas. Est between 2004 and 2015, job density in the Baton Rouge metropolitan area declined as urban sprawl in the area increased. If job density continues to decrease, residents in East Baton Rouge Parish may face longer commutes and greater challenges accessing jobs in the future.

Loss of Affordable Housing

The loss of affordable housing is a contributing factor to fair housing issues. In August 2016, the Baton Rouge area suffered significant damage from widespread flooding caused by unprecedented rainfall. The 2016 floods destroyed more than 90,000 homes in Louisiana, including 28,000 rental units. In Baton Rouge, about 12,000 rental units were affected.⁶⁷ In Baton Rouge, the loss of units contributed to significant increases in fair market rent.⁶⁸ In East Baton Rouge, about 42% of families with Housing Choice Vouchers who were displaced by flooding were unable to locate another unit in the six months after the flood. The age of the housing stock further contributes to problems.

Long-term trends indicate that affordability in the region has generally declined over time. According to the 2019 Louisiana Housing Needs Assessment, the number of units affordable to low-income families (defined as families making \$25,000 or less per year) has declined from 2010 to

⁶¹ https://www.theadvocate.com/baton_rouge/news/business/article_30c22c9e-6cdb-11e9-9617-db1bbb0b1805.html

⁶² https://www.rent.com/blog/national-apartment-rent-price-analysis/#Top100

⁶³ https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020_code/2020summary.odn

⁶⁴ https://www.brla.gov/DocumentCenter/View/1969/Land-Use-PDF?bidId=

⁶⁵ Id

⁶⁶ https://www.brookings.edu/wp-content/uploads/2019/06/2019.06 Bass-Center Geography-of-jobs-report.pdf

⁶⁷ https://www.theadvocate.com/baton_rouge/news/article_0d7e448c-b8e3-11e7-9b2a-c39c9eb20e23.html ⁶⁸ https://link.springer.com/chapter/10.1007%2F978-3-030-27205-0_10

2016 in the region. The housing stock in Baton Rouge is also aging. In several census tracts close to downtown Baton Rouge, 50% or more units were built prior to 1950.69

Location and Type of Affordable Housing

The location and type of affordable housing is a significant contributing factor to fair housing issues. Multifamily units, which tend to be more affordable than detached single-family homes, are very unevenly distributed. East Baton Rouge Parish has far more multifamily units than surrounding parishes. There is also a large number of mobile homes in the region which also tend to be a more affordable housing option. While mobile homes make up a small portion of the housing stock in East Baton Rouge Parish, mobile homes make up a significant amount of the housing stock in adjacent parishes.⁷⁰ Mobile homes make up 35% or more of units in many census tracts in West Baton Rouge, West Feliciana, East Feliciana, St. Helena, and Livingston Parishes.

Publicly supported housing units are not evenly distributed. The majority of public housing units and Project-Based Section 8 properties in the region are concentrated in East Baton Rouge Parish. Within the parish, most publicly supported housing properties are located in north Baton Rouge, Mid-City as well as in South Baton Rouge near LSU. Many of these publicly supported housing sites are in or near R/ECAPs. Voucher units in the region are also concentrated in East Baton Rouge Parish, with higher concentrations in the northern portion of the parish.

Access for students with disabilities to proficient schools

Access for students with disabilities to proficient schools is not a significant contributing factor to fair housing issues for persons with disabilities in Baton Rouge and the surrounding region. This analysis did not reveal current systemic problems in the policies of either the East Baton Rouge Parish School System or the Louisiana Recovery School District with respect to the education of students with disabilities. The Louisiana Department of Education did, however, settle a class action lawsuit alleging violations of the rights of students with disabilities in New Orleans schools overseen by the Recovery School District in 2014.

Access to transportation for persons with disabilities

Access to transportation for persons with disabilities is a significant contributing factor to disparities in access to opportunity and segregation for persons with disabilities in Baton Rouge and the broader region. The area has an extremely limited public transportation system, especially outside of Baton Rouge and immediately adjacent portions of East Baton Rouge Parish. Within the system operated by the Capital Area Transit System (CATS), one-hour headways are common, which means that seemingly simple errands such as medical appointments can require lengthy commutes. Surrounding parishes generally lack any bus service whatsoever. Because persons with disabilities have disproportionately low incomes and some disabilities, such as vision disabilities, may make it difficult or impossible to drive, this broad lack of access to public transportation harms persons with disabilities. In addition to depriving persons with disabilities of equitable access to transportation, it may make it infeasible for persons with disabilities to reside outside of central portions of Baton Rouge that have more access to even limited public transportation than do outlying areas.

⁶⁹https://www.lhc.la.gov/hubfs/Document%20Libraries/Housing%20Policy%20and%20Data/RLMA2.pdf ⁷⁰Id.

CATS asserts that its buses meet ADA accessibility requirements and the system offers paratransit service as well as reduced-rate fares for persons with disabilities. Although allegations of past noncompliance with the ADA resulted in the Advocacy Center filing a class action lawsuit against CATS in 2007, the parties settled that lawsuit in 2008. This Assessment did not reveal information reflecting current noncompliance with the ADA by CATS. The most significant current barriers to equitable transportation for persons with disabilities in Baton Rouge and the surrounding region are infrequent service and lack of bus lines connecting Baton Rouge to outlying communities, particularly those outside of East Baton Rouge Parish through an integrated, regional system.

Lack of affordable in-home or community-based supportive services

Lack of affordable in-home or community-based supportive services is a significant contributing factor to the segregation of persons with disabilities. As of 2018, there was a statewide waiting list of with over 9,400 individuals for Medicaid-funded Home and Community-Based Services Waivers for persons with developmental disabilities. Precise data reflecting how many people from the waiting list are from Baton Rouge or its surrounding region is not available, but it is likely that there are several hundred residents of the region who are not currently receiving the level of in-home or community-based supportive services that they need and for which they are theoretically qualified. This situation can result in individuals residing in ICFs, nursing homes, and other congregate facilities when they could and might desire to live in more integrated settings. It can also make adult children of aging parents vulnerable to segregation if their parents are no longer able to care for them in home-based settings. In addition to the overall shortfall of Waivers, there is evidence that the State's provider rates for Waiver services are insufficient to most effectively support the provision of services in the most integrated settings. Although the problem of lack of access to services does not appear to be as dire for persons with mental illness, this remains a significant barrier. Because the programs at issue are administered by the State of Louisiana, this problem has a similar effect across jurisdictional lines within the region.

Lack of private investment in specific neighborhoods

Lack of private investment in specific neighborhoods is a significant contributing factor to disparities in access to opportunity and disproportionate housing needs for Black residents of the northern portion of Baton Rouge. Retail and commercial development in Baton Rouge is highly concentrated in the downtown area as well as in more heavily White suburbanized portions of Baton Rouge and adjacent unincorporated portions of East Baton Rouge Parish. This uneven economic development isolates Black residents of the northern portion of Baton Rouge from job opportunities thus increasing disparities in job proximity and labor market engagement. Additionally, reduced incomes resulting from lower labor market engagement and decreased disposable income due to higher commuting expenses combine to put more financial stress, including rent burden, on Black households.

Access to publicly supported housing for persons with disabilities

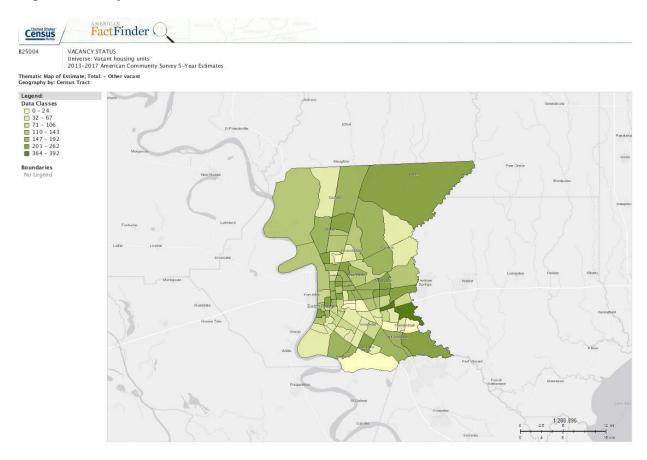
Access to publicly supported housing for persons with disabilities is a significant contributing factor to disproportionate housing needs and segregation for persons with disabilities. Although persons with disabilities reside in most categories of publicly supported housing at rates that are commensurate with their share of the income-eligible population, they, like other disproportionately low-income groups, suffer from the overall lack of affordable housing in Baton Rouge and the surrounding region.

Deteriorated and abandoned properties

Deteriorated and abandoned properties are a significant contributing factor to R/ECAPs and to disparities in access to opportunity for Black residents of the northern portions of Baton Rouge. As

the map below shows, there are higher numbers of "Other Vacant" properties in predominantly Black neighborhoods in northern Baton Rouge, neighborhoods which often align with R/ECAPs. Other Vacant properties, which are not currently available for rent, are often properties in such serious decay that their owners could not legally rent them out. The prevalence of these structures reduces neighboring home values thus limiting the ability of Black homeowners to build wealth through home equity appreciation. They also make certain neighborhoods less appealing places for businesses to choose as their location thus perpetuating disparities in labor market engagement and job proximity. Other Vacant properties often exist side-by-side with currently occupied properties that are deteriorated to the point where they are at risk of becoming vacant. These properties may not be safe places to live for their residents and may play a role in perpetuating racial disparities in health outcomes.

Map 72: Vacancy Status



Inaccessible public or private infrastructure

Inaccessible public or private infrastructure is not a significant contributing factor to fair housing issues in Baton Rouge and the surrounding region. Although this Assessment did not provide a basis for concluding that public and private infrastructure is consistently accessible, nor did it reveal evidence of systemic accessibility gaps that have a pronounced causal influence on particular fair housing issues. In some parts of Baton Rouge, the absence of sidewalks, rather than existing sidewalks that are inaccessible, makes it harder for persons with disabilities to get around. Expanding infrastructure and ensuring that is accessible by design would enhance access to opportunity for persons with disabilities.

Inaccessible government facilities or services

Inaccessible government facilities or services is not a significant contributing factor to fair housing issues in Baton Rouge and the surrounding region. Although this Assessment did not provide a basis for concluding that government facilities or services are consistently accessible, nor did it reveal evidence of systemic accessibility gaps that have a pronounced causal influence on particular fair housing issues. It would be beneficial for some parish and city governments in the region outside of Baton Rouge to make accessibility improvements to their websites; however, the ability of the City-Parish to bring about that change is limited.

Lack of affordable, accessible housing in a range of unit sizes

Lack of affordable, accessible housing in a range of unit sizes is a significant contributing factor to disproportionate housing needs and segregation for persons with disabilities in both Baton Rouge and the broader region. The lack of affordable, accessible housing in a range of unit sizes results from an overall lack of affordable housing and a trend toward including proportionally more one-bedroom units in new affordable housing developments. In outlying portions of the region, the predominance of single-family homes, including for residence by low-income households, means that there are few housing options that are accessible to people with disabilities. Single-family homes are not subject to the Fair Housing Act's design and construction standards.

Lack of affordable, integrated housing for individuals who need supportive services

Lack of affordable, integrated housing for individuals who need supportive services is a significant contributing factor to disproportionate housing needs and segregation for persons with disabilities in both Baton Rouge and the broader region. Housing agencies in Baton Rouge and Louisiana more broadly have prioritized the development of affordable, integrated housing for individuals who need supportive services. In particular, the Louisiana Housing Corporation successfully sought a Section 811 Project Rental Assistance grant and invests both LIHTC and Project-Based Vouchers in permanent supportive housing. Baton Rouge layers its own subsidies, such as HOME funds, in with assistance administered by the Louisiana Housing Corporation. The problem, then, is not with prioritization within existing housing programs, but rather that the total amount of housing produced is not sufficient to meet the total need for permanent supportive housing. New nonfederal resources will be necessary to any attempt to overcome this contributing factor.

Lack of assistance for housing accessibility modifications

Lack of assistance for housing accessibility modifications is not a significant contributing factor to fair housing issues for persons with disabilities in Baton Rouge though it does contribute to segregation throughout the remainder of the region. Baton Rouge dedicates a larger proportion of its CDBG funds to the rehabilitation of homes owned by low-income households than it does to any other use. Baton Rouge's Consolidated Plan expressly contemplates the use of these funds for accessibility modifications. On top of these services, Habitat for Humanity of Greater Baton Rouge also provides home repair services for low-income homeowners. Outside of Baton Rouge, assistance for housing accessibility modifications is less available, because the Louisiana Office of Community Development does not dedicate any CDBG funds to the rehabilitation of owner-occupied dwellings. When persons with disabilities cannot make accessibility improvements, such as the installation of ramps or the widening of doorways, they may have no option other than to live in a segregated setting such as a nursing home.

Lack of assistance for transitioning from institutional settings to integrated housing

Lack of assistance for transitioning from institutional settings to integrated housing is a significant contributing factor to segregation for persons with disabilities in Baton Rouge and the broader region. Specifically, a lack of transition assistance for persons with developmental disabilities is an identifiable gap, as there have been notable improvements with respect to transition services for persons with psychiatric disabilities due to the implementation of the *U.S. v. Louisiana* settlement agreement. Individuals among Baton Rouge's large group home population may not be aware of opportunities to move into independent housing that arise as a result of efforts by the City and the Louisiana Housing Corporation to expand permanent supportive housing. Intensive case management focused on housing is necessary to bridge that knowledge gap.

Location of accessible housing

The location of accessible housing is a significant contributing factor to the segregation of persons with disabilities in Baton Rouge and the broader region. Due to the predominance of single-family homes in most parts of the region outside the central and northern portions of Baton Rouge, accessible housing opportunities tend to be concentrated in just a few areas that tend to be areas of concentrated poverty and limited access to opportunity. The exception to this general trend is that there are portions of southern Baton Rouge and nearby unincorporated areas that have relatively new, market-rate multifamily developments. Although those developments are not a source of affordable, accessible housing, they may be a source of accessible housing that relatively higher-income persons with disabilities can utilize.

Regulatory barriers to providing housing and supportive services for persons with disabilities Regulatory barriers to providing housing and supportive services for persons with disabilities are not a significant contributing factor to fair housing issues for persons with disabilities in Baton Rouge or the surrounding region. Baton Rouge does not impose any additional regulatory requirements on group homes and other types of housing that specifically serve persons with disabilities. The City's Unified Development Code explicitly provides that group homes are treated as single-family homes and allowed by-right where single-family homes are permitted. To some extent, the uneven distribution of land zoned for multifamily housing generally, including less such land in predominantly White, higher opportunity areas, constitutes a regulatory barrier to providing housing for persons with disabilities. Strategies to overcome that barrier, however, can be part of one broad effort to reduce the segregative impact of exclusionary zoning rather than broken up into smaller, more specific pieces.

State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings are a significant contributing factor to segregation in Baton Rouge and the surrounding region. One key state policy functions to discourage individuals with disabilities from living in integrated settings: Medicaid reimbursement rates that are not adequate to sustain the provision of supportive services to individuals who are dispersed across the community, rather than living in a single group home. Beyond that one important issue, although the jurisdictions in the region (buttressed by the efforts of the State) have not achieved full community integration, the absence of full funding for supportive services and integrated housing are more significant causes of that situation rather than policies such as program rules that discourage community integration.

Community Opposition

Community opposition is a significant contributing factor to segregation in East Baton Rouge Parish. In 2011, neighbors in the Jefferson/Drusilla neighborhood complained to city officials that people recovering from alcohol and substance abuse were residing in a single-family home in the area. The home was being leased and operated as an Oxford House, a democratically-run home for adults in recovery. The complaints led to the City-Parish requesting that the Oxford House cease operations or face penalties. The City-Parish did not provide an adequate reasonable accommodations process for the Oxford House to request a waiver of local zoning rules in order to allow the residents with disabilities to continue living in the home as a family. Instead, the City-Parish filed suit in state court to enforce their zoning rules and were later sued for violations of the federal Fair Housing Act. In 2013, a federal judge found that the parish's zoning code facially discriminated against people with disabilities. The application and procedures that were developed as a result address group homes, but may not fit other types of requests for reasonable accommodations as well.

In 2018 and 2019, neighborhood association leaders also brought complaints about group homes serving people with disabilities to a state legislative task force and hearings on proposed state legislation to regulate those homes.⁷³

Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is a significant contributing factor to segregation in East Baton Rouge Parish. After the flooding in 2016, not all residents were able to return and rebuild their homes. At the time, flood insurance was not mandatory for most neighborhoods in East Baton Rouge Parish. Many low-income families, disproportionately located in neighborhoods of color could not afford to return and rebuild their homes. Because of this, their homes have turned into blight, and the neighborhoods are being affected by increasing health hazards like mold and overgrowth. Unless the city-parish addresses and resolves the blight, some neighborhoods will continue to depreciate. Further, neighborhood residents who may want to move to areas with less blight may not be able to tap into equity in their current home to access homes in high-opportunity areas.

Additionally, stakeholder meetings revealed that there is some concern about rising rents in parts of Mid City, as new developments move into the Government St. Corridor near S. Acadian Thruway. In this part of the parish, Government St. divides the majority-Black northern neighborhoods of the parish from the majority-White southern neighborhoods. Though Baton Rouge likely does not experience this issue in the same way as New Orleans, these may be the beginning signs of gentrification and displacement in this particular area.

Lack of private investments in specific neighborhoods

Lack of private investments in specific neighborhoods is a significant contributing factor to segregation in East Baton Rouge Parish. At the first public comment session, Baton Rouge residents in the northern part of the Parish shared that even if they manage to secure employment in the

⁷¹ https://www.theadvocate.com/baton_rouge/opinion/letters/article_87770271-1a41-5a5b-b532-d10b9fd6851e.html; https://www.theadvocate.com/baton_rouge/opinion/letters/article_f2460b37-059a-508f-9506-4f150bb802c0.html

⁷² https://www.theadvocate.com/baton rouge/news/article 5a47d97c-20c9-5279-9974-49413eb019c1.html

⁷³ http://senate.la.gov/video/videoarchive.asp?v=senate/2018/09/092818HUMANDEGRADATION

north part of the parish, the lack of amenities means that their only options for spending their money is outside of the community. Residents mentioned typically driving out of their neighborhoods to get to quality grocery stores, restaurants, and shopping opportunities that they can enjoy on Highland and Perkins Roads in South Baton Rouge.

A number of national lending institutions have also been sued in recent years—including in Baton Rouge—for an alleged disparity in how they maintain foreclosed and bank-owned homes in black neighborhoods vs. white neighborhoods. Wells Fargo settled these claims with the Louisiana Fair Housing Action Center and National Fair Housing Alliance, but cases remain against Fannie Mae, Deutsche Bank, and Bank of America.⁷⁴

Lack of public investments in specific neighborhoods, including services or amenities

Lack of public investments in specific neighborhoods, including services or amenities is a significant contributing factor to disproportionate housing needs and segregation in East Baton Rouge Parish. Most publicly supported housing dollars have funded developments in North Baton Rouge, Scotlandville, and Baker. The southern, majority White neighborhoods in Baton Rouge have received very few dollars for affordable housing development. The most recent four developments supported with HOME funds were all in majority-African American neighborhoods.

There is also not enough affordable housing to address the needs of people who work in the area but travel from the north. Residents in predominantly African American neighborhoods also struggle with public transportation that is unreliable. Residents complain about commutes that can take up to two hours for them to arrive at work.

Land use and zoning laws

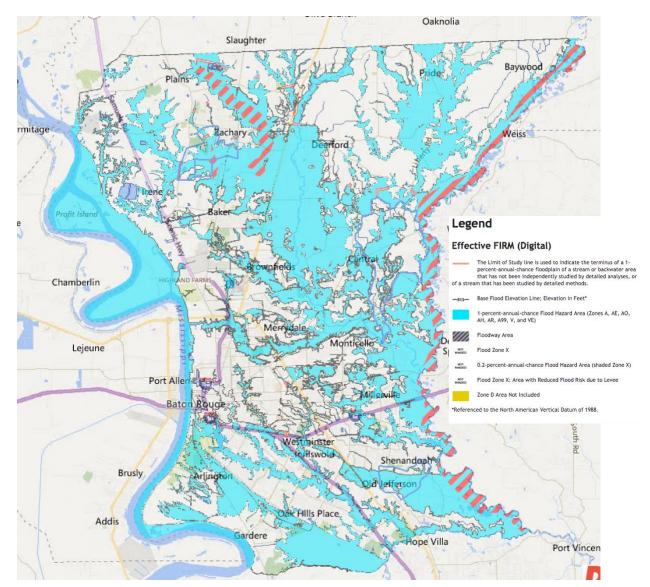
Land use and zoning laws are a significant contributing factor to segregation in East Baton Rouge Parish. Aside from the areas near LSU, much of the majority-White southern portion of the parish is zoned for single-family homes, despite investigative reporting revealing that the ongoing construction of suburbs is likely contributed to increased flooding in the region.⁷⁵

The Office of Community Development has reported difficulty with garnering approval for zoning changes that could usher in affordable multi-family structures in predominantly White areas due to a reluctance to build in wetlands. Despite having lower average ground elevation, much of the southwestern portion of the parish is considered an "Area with Reduced Flood Risks" by FEMA due to levee protections. The only neighborhood in the southern part of the parish that FEMA considers a "Special Flood Hazard Area" is Stevendale. The LSU Ag Center's flood map shows that if flood risk were the only factor determining where multifamily housing should be located, we would expect apartments to be located throughout the parish, not just in the northern, majority-Black neighborhoods and near LSU.

⁷⁴ https://nationalfairhousing.org/nfha-lawsuit-against-fannie-mae-for-reo-maintenance/; https://nationalfairhousing.org/2018/02/01/deutsche-bank-ocwen-financial-and-altisource-accused-of-racial-discrimination-in-30-u-s-metro-areas/

⁷⁵ https://www.washingtonpost.com/outlook/2019/11/12/how-racial-segregation-exacerbates-flooding-baton-rouge/

⁷⁶ http://maps.lsuagcenter.com/floodmaps/?FIPS=22033



Map 73: FEMA Flood Maps, East Baton Rouge Parish

Lending discrimination

Lending discrimination is a significant contributing factor to segregation in East Baton Rouge Parish and the region. In a 2018 news publication aired on PBS, journalists from Reveal, The Center for Investigative Reporting, analyzed Home Mortgage Disclosure Act (HMDA) data from the Baton Rouge region and found that Black applicants were 2.9 times as likely to be denied a conventional home mortgage as white applicants. Statistical factors made it difficult to draw conclusions for Asian and Latino applicants.

One resident also noted an increase in "reverse-redlining" at a public comment session. Reverse redlining occurs when a lender or insurer targets particular neighborhoods that are predominantly nonwhite to charge them more than in a non-redlined neighborhood where there is more competition. Without a clear view of the credit worthiness of applicants, it is difficult to draw

conclusions about the prevalence of lending discrimination in the region. However, the numbers show that disparities in access to conventional mortgage financing exist along racial lines.⁷⁷

Location and type of affordable housing

Location and type of affordable housing is a significant contributing factor to segregation in East Baton Rouge Parish and the region. Almost all the publicly-subsidized housing in the region is in predominantly African American neighborhoods in the northern section of East Baton Rouge Parish. A lot of the affordable housing developments available there are apartments, and residents who attended the public meeting commented that some Baton Rouge residents who are accustomed to homes with yards are reluctant to move into apartments—even if they are affordable.

HUD maps reveal areas of high white population with very few market-rate affordable housing options. The only multi-family project-based Section 8 development in the southern portion of Baton Rouge is Sharlo Terrace, with 127 units. It is situated in a census tract that is 66% African-American and is in close proximity to LSU campus. The rest of the region is sprinkled with low income housing tax credits that house majority white families in majority white census tracts.

Out of 16,431units funded by the Section 8 Program and Low Income Housing Tax Credits in East Baton Rouge Parish, only 3,109 of them are in census tracts where the white residents comprise more than 50% of the population there. This means that predominantly white neighborhoods in the southern section of Baton Rouge are home to only 19% of the Section 8 and LIHTC housing in the region.

Displacement and lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement and lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking are a significant contributing factor to disproportionate housing needs for women throughout Louisiana and in Baton Rouge. The Louisiana Coalition Against Domestic Violence (LCADV) reported that 75% of Louisiana's homeless adults report being victims of domestic violence. LCADV's survey results showed that one in three of their state-wide clients being housed at domestic violence shelters reported being evicted because of the actions of their abuser.⁷⁹

Iris Domestic Violence Shelter is the sole shelter for survivors of domestic violence in the East Baton Rouge Parish with the capacity to house 22 individuals concurrently and plans to expand. EBRPHA does not currently provide emergency vouchers for victims of domestic violence. The YWCA has a local branch in Baton Rouge that serves survivors of domestic violence by providing temporary housing and facilitating a transition to permanent housing by financing security deposits and rental assistance. They also link survivors with other resources in the area and are planning to build an apartment complex that will specifically house victims of abuse. Sexual Trauma Awareness and Response (STAR) is the regional service provider for victims of sexual assault in Vernon, Rapides, Grant, Avoyelles, Pointe Coupe, West Feliciana, East Feliciana, West Baton Rouge, East Baton Rouge, Ascension, and Iberville Parishes. The agency provides counseling and supportive

 $^{^{77}\ \}underline{\text{https://www.revealnews.org/article/gentrification-became-low-income-lending-laws-unintended-consequence/}$

⁷⁸ AFFH Data and Mapping Tool

⁷⁹ LCADV point in time survey of shelters, 2015.

services, but not housing. There are currently no housing services for victims of sexual assault and stalking in the region.

Lack of meaningful language access for individuals with limited English proficiency

Lack of meaningful language access for individuals with limited English proficiency is a significant contributing factor to disparities in access to opportunity. Though still a relatively small share of the total population, the population of people with limited English proficiency has grown between 1990 and 2010 in both the Jurisdiction and the Greater Baton Rouge region. In the Jurisdiction, the percentage increased from 2.14% in 1990 to 3.25% in 2010. In the region, the percentage increased from 1.86% to 2.17% during the same time. The city-parish's website, brla.gov, does include a Google translate function to provide basic translation to over 100 languages, however, PDF documents posted on the site, such as the "Step-by-Step Protocol" for rebuilding safely after flooding, are not translated. Neither Build Baton Rouge nor the East Baton Rouge Public Housing Authority's websites include this function and brochures and other literature are not copied in other languages.

Private discrimination

St. George is situated to become its own city after it won enough votes to incorporate in 2019. St. George organizing began with the expressed goal to create a new school district separate from Baton Rouge Public Schools. Since incorporation efforts, the area has become increasingly inaccessible for protected class members.

According to HUD data released in a FOIA Request to LaFHAC, 46 cases have been filed either in state court or with HUD since 2016 in East Baton Rouge. Of the 46 cases, 20 of them were filed within zip codes 70810, 70809, 70817, and 70816. Each of these zip codes are situated within St. George's boundaries. Of these 20 complaints, 13 were filed on the basis of disability, 6 on the basis of race, and 4 on the basis of sex. Some of the complaints filed have more than one basis.

Lack of local private fair housing outreach and enforcement

LaFHAC serves the entire state of Louisiana, but its resources are spread throughout the state, which makes it difficult for staff to address Baton Rouge at the rate that fair housing assistance is needed there.

Lack of local public fair housing outreach and enforcement

There are no municipal agencies or resources in Baton Rouge that are dedicated to combating housing discrimination. Patterns of segregation, housing discrimination, and neglect have persisted due to lack of capacity to confront these issues.

The Louisiana Department of Justice (LA DOJ) previously adopted a standard of interpreting the Fair Housing Act that was inconsistent with federal law. The LA DOJ's standard required that a respondent violate multiple, separate provisions of the Fair Housing Act for a case to be ""caused"." After inquiries about the agency's practices, HUD conducted a review and now if LALA DOJ makes a cause determination and the parties do not settle within 60 days, the LA DOJ's practice is to file a petition with state district court.

Lack of resources for fair housing agencies and organizations:

LaFHAC provides significant fair housing outreach and enforcement resources but is underfunded relative to the need. The organization responds to complaints and conducts outreach statewide, and therefore has fewer resources dedicated exclusively to Baton Rouge.

Lack of state or local fair housing laws:

The Baton Rouge Metro Council has missed two opportunities to ratify a local civil rights ordinance that would make unlawful discrimination in housing, employment, and public accommodations on the bases of race, color, sex, disability, age, ancestry, nationality, sexual orientation, and political and religious affiliations. First introduced in 2013, the "'fairness ordinance" faced opposition from the Louisiana Family Forum and other conservative groups. The bill was supported by local civil rights organizations, LGBTQ organizations, and business leaders.

Local activists tried again in 2019 to pass the ordinance with a new Metro Council, but still faced opposition from conservative groups. Shreveport and New Orleans, the two other largest cities in Louisiana, each have local civil rights ordinances that include protections for LGBT residents. Based on the Human Rights Campaign Index, Baton Rouge scored 42 out of the maximum 100. This is far below Shreveport's score of 77 and New Orleans' score of 100.80

Unresolved violations of fair housing or civil rights law

LaFHAC is party to complaints, along with multiple other fair housing centers and the National Fair Housing Alliance, against Fannie Mae, Bank of America, and Deutsche Bank for failing to maintain their real estate owned properties in neighborhoods of color in New Orleans and Baton Rouge.

⁸⁰ https://www.businessreport.com/article/baton-rouge-ranked-third-state-lgbtq-equality

Section VI. Fair Housing Goals & Priorities

Fair Housing Goals and Priorities

The City-Parish and Build Baton Rouge, in partnership with the East Baton Rouge Parish Housing Authority, residents, representatives from the business, economic development, non-profit, faith, and other key community stakeholders, propose the fair housing goals and strategies listed below to address the challenges raised in this Assessment of Fair Housing. The goals and strategies reflect the balanced approach of increasing access to high opportunity areas and public investment in underserved neighborhoods.

Goal #1: For underserved and disinvested neighborhoods, improve the conditions of the existing housing stock, target efforts to address vacant buildings and lots, and prioritize investments in infrastructure and amenities.

Strategies:

- Pursue the Plank Rd. Master Plan and its proposed investments in bus-rapid transit, a food hub, civic center, Eco Park, childcare center, and improved retail establishments.
- If additional affordable housing funds are to be invested in these neighborhoods (especially in north Baton Rouge), ensure they are on high-frequency transit routes.
- Consider working with CATS to ensure the planned redevelopment of Ardenwood Village includes high frequency transit access, potentially by extending the 21 Fairfields Ave./Cortana Mall route into downtown and decreasing headways to 10-15 mins.
- Implement counseling and other services for residents displaced by the Ardenwood Village redevelopment to ensure they can return.
- Ensure the unit mix of new units at Ardenwood Village allows for the same family sizes as the existing development.
- Implement a Choice-Mobility Plan for any future RAD conversions of public housing to ensure existing residents can return.
- Prioritize code enforcement, demolition, and other resources in high poverty neighborhoods.
- Support state legislation to curtail payday lending; consider zoning rules to limit the proximity of payday lenders.
- Explore a partnership with the National Community Reinvestment Coalition (NCRC) to facilitate performance evaluations of banks throughout the region. This could be the first step in a process of negotiating community benefits agreements (CBAs) under the framework of the Community Reinvestment Act between banks and segregated, disinvested communities.
- Consider rental registration and inspection programs to bring existing housing stock up to code.
- Consider anti-retaliation protections for renters to ensure the City-Parish receives the information it needs to counter deteriorating rental housing conditions.
- Consider the disproportionate impacts of pollution on majority-Black and low-income communities in Industrial Tax Exemption Program decisions.

Goal #2: Combat entrenched segregation by lowering barriers to affordable housing in lower poverty and less segregated neighborhoods, especially in south Baton Rouge.

Strategies:

- Target housing and community development funds in low-poverty areas or neighborhoods that may be susceptible to rising home costs and associated displacement (ex: Government St. Corridor or south Baton Rouge neighborhoods).
- Implement zoning incentives for mixed-income housing located in low poverty areas or areas susceptible to displacement.
- Study whether flood zone restrictions have a disparate impact on multifamily buildings in south Baton Rouge.
- Prepare a report on the expiration of subsidies in Low Income Housing Tax Credit (LIHTC) and Project Based Voucher (PBV) buildings and prioritize investment in maintaining the few affordable units that do exist in south Baton Rouge.
- Prioritize PBV allocations in low-poverty areas or areas susceptible to displacement.
- Implement zip code-based exception payment standards for the Housing Choice Voucher Program (HCVP) to ensure vouchers can cover rent in lower poverty neighborhoods.
- Recruit landlords in lower poverty neighborhoods to participate in the HCVP and create a landlord liaison position at the EBRPHA to help new landlords enter the program.
- Provide electronic document signing capabilities for HCVP tenants and landlords.
- Increase mobility counseling and search assistance for HCVP participants.

Goal #3: Invest in Fair Housing education, resources, and enforcement.

Strategies:

- Train 311 operators on how to spot housing discrimination complaints and offer appropriate referrals.
- Update the City-Parish website to include referral information for state and local fair housing organizations serving clients who have experienced discrimination.
- Craft an annual public information campaign to raise awareness about fair housing laws and resources during Fair Housing Month (April)
- Consider funding for fair housing testing in the parish to understand discriminatory trends and identify systemic discrimination. Fair housing testers are professionally trained "mystery shoppers" who pose as home seekers to investigate whether people from protected classes are treated differently.
- Pass a Fairness Ordinance to create a human relations commission that extends fair housing protections to include age, sexual orientation, and gender identity or expression.

Goal #4: Advance access for people with disabilities and other marginalized groups.

Strategies:

- Revise the Planning Commission's reasonable accommodations process to ensure it is comprehensive.
- Better advertise the reasonable accommodations resources on the City-Parish and EBRPHA websites.
- Ensure new bus rapid transit lines include at grade access to buses for people with mobility impairments.
- Ramp up implementation of the Baton Rouge Complete Streets policy and plan.
- Consider ending project-based waitlists at EBPRHA to ensure better access for people with disabilities.
- Increase requirements for the share of units that must be accessible in all developments that utilize City-Parish housing funds.
- Expand permanent supportive housing and include intensive case management.
- Change the definition of "Family" in the Unified Development Code to allow four unrelated people to live together, even if the owner doesn't on the premises.
- Reform EBRPHA's criminal background screening procedures and ensure any new contracts with third party operators require the use of the updated screening procedures.
- Ensure people with limited English proficiency can access city-parish websites, housing programs, EBPRHA programs, and other assistance programs.

Section VII. Appendixes

Appendix A: Organizations Invited to the Community Participation Process

Capital Area Alliance for the Homeless

East Baton Rouge Parish Housing Authority

St. Vincent de Paul

Hope Ministries

Urban Restoration Enhancement Corporation (UREC)

Volunteers of America Greater Baton Rouge

Build Baton Rouge, the Redevelopment Authority of East Baton Rouge Parish

East Baton Rouge City-Parish Office of Community Development

Habitat for Humanity

Partners Southeast

MMO Behavioral Health Systems

LA Hospital Association

Interfaith Federation

Capital Area Human Services District

Lafleur Industries

Empower 225

Franciscan Missionaries of Our Lady Health System

Neighborhood Assistance Corporation of America

Capital Area United Way

Mid-City Redevelopment

All East Baton Rouge Metropolitan Council Members

Downtown Development District

Capital Area Transit

Scotlandville Community Development Corporation

Open Health Care Clinic

Veterans Affairs

Star Hill Baptist Church

Southeast Louisiana Legal Services

Healing Place Church

Keller Williams Realty

Vital Resource Solutions