

APPENDIX E. SUMMARY OF COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD

During the public comment, the draft AFH was edited for final copy. A markup of the draft AFH is available on MDHA's website along with the final draft.

Below is summary of comments received at the public hearings and submitted in writing during the public comment period, with MDHA's included.

Recordings of the public hearings and the markup of the AFH will remain available on MDHA's website until HUD approves the AFH. At that time, the recordings and marked-up AFH will be removed from the website but will be available upon request during the retention period.

AFH Public Hearing | West Precinct

MDHA held a public hearing on Thursday, June 1, 2017 at 5:30 p.m. at West Precinct. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft.

No public comments were received.

AFH Public Hearing | Bordeaux Library

MDHA held a public hearing on Tuesday, June 6, 2017 at 5:30 p.m. at the Bordeaux Public Library. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft. Below is a summary of questions and comments received and MDHA's responses.

- We appreciate your hard work, but I'm just going to get to the elephant in the room: for people of color and people of non-color who live in this district, we already know that we're discriminated against. We know that everything nobody else wants comes this way. If we're moving past discriminating practices and segregation of a city, the common denominator is developers who say that the city is giving them money to bring affordable housing. But it's not mixed-used or mixed-income; it is one hundred percent low-income. If we're trying not to discriminate, why are we incentivizing it?

This is the first time, as far as I know, we've had a report this comprehensive to help guide our decision-making at MDHA; the report shows where housing and lack of

opportunity are in the same places. This way we can hold ourselves accountable as a city for where we build housing.

- We've had so many opportunities for affordable housing downtown, but MDHA gave them away for higher-income developments. But what you're actually doing is moving people from one area to our area and creating new housing projects. We know that low-income housing is concentrated in our area; we know it's focused in black neighborhoods in other cities, too. But when does it stop?

One of our goals with this report is to show where housing and lack of opportunity occur in the same places. HOME funding has traditionally been awarded to lower income areas because that's where land costs tend to be less expensive. We know we need to dedicate HOME funding to high opportunity areas to help balance affordable that already exists in other areas.

- During a meeting about the proposed townhomes on County Hospital Road, the community was against it. MDHA said the plan could be revised, but I read a newspaper article that said the project was moving forward to review by the Planning Department. For this community, the lack of transparency in that planning process has been so disrespectful. It's a slap in the face. The developers are agitated by our questions; one developer told me that they care about affordable housing. I responded that I care about my neighborhood.

Thank you for your comment. We will certainly include your comments on the townhome project.

- The number of people in this room is not representative of the number of residents who care about this community. There is not an effective way to get notification to people who care about these meetings. I think a lot of people would have come to this public hearing if they had known about it.

The report is available on our website and we have shared meeting details online, on social media, on radio, and in newsprint. But MDHA is always looking for way to improve our public outreach.

- How is Rental Assistance Demonstration going to affect public housing in the next five years, and where is it going to place public housing residents?

Rental Assistance Demonstration (RAD) changes the public housing business model. For traditional public housing, we take a subsidy from HUD, called an annual contribution contract; HUD lays down a deed of trust for all traditional public housing properties like Cayce Place, Napier/Sudekum, or Cumberland View and restricts what MDHA can do with those properties. RAD allows MDHA to covert our business model to a type more like a project-based rental assistance owner, and HUD releases the deed of trust. MDHA can then apply for loans in the private market to

recapitalize and rebuild on our sites; we can bring in mixed-income housing as well to help revitalize public housing sites without displacing residents.

- What happens to residents with the lowest incomes when MDHA has to service the debt using this new model?

We are committed to making sure that public housing remains on these properties; we are committed to residents having the option to stay in that housing. But we will rely on mixed-income to service that debt; our goal is to include workforce housing, which goes up to 60 - 80% AMI, and even some market rate housing to help service debt.

- What investments are MDHA going to make in this neighborhood? You're building on Jefferson St. and Dickerson Rd., and it's almost like MDHA is getting out of the public housing realm and into the private development side. Some of these developments look like conventional developments.

MDHA has always undertaken different types of housing including public housing. Under our development arm, we have two Low Income Housing Tax Credit (LIHTC) properties that are not public housing at Rolling Mill Hill. HUD has also set aside some funding that we cannot use for public housing: 10th and Jefferson and Uptown Flats on Dickerson Road are properties that utilize that type of stimulus funding from HUD, which serves higher incomes at 120% AMI.

- Can some of those types of projects come to this district?

The townhome project on County Hospital Road we are proposing is an example of that type of project. The income threshold will go up to 120% AMI for a family of four, which is about \$82,000. That is the same type of mixed-income as Uptown Flats, and the product would look similar to properties like Rolling Mill Hill or Uptown Flats.

- What about other areas of Nashville such as Belle Meade and Green Hills? Are these same types of development happening there? If not, then why not?

One reason this type of development is not happening there is that many of these areas are not high rental areas. They are areas of high homeownership.

- That is understandable, but the Bordeaux area has a high rate of homeownership, too. If the distribution of housing in the city is to be equal, that same affordability should be offered in those other areas.

We received comments related to the need for inclusionary housing distribution to be equitable in areas where there is not affordable housing. That is why we are going to dedicate our HOME funding, which we award to our non-profits partners, to go to areas of opportunity with a larger white population. We are trying to incentivize

housing in these areas of opportunity and attract investment into higher poverty areas and high rental areas.

- Because we know there will be opposition, do you have someone to lobby for laws to help issues of segregation and housing equity in Nashville?

We don't have a formal lobbyist because we predominately rely on federal funding and that funding cannot be used to lobby.

- How is MDHA going to be a part of the solution in addressing segregation and pockets of poverty in Nashville? How are you going to fight the opposition when affordable housing projects try to go to Green Hills or Belle Meade? What's the plan?

Within our resources for traditional public housing, MDHA is going to recapitalize those properties to bring investment and more integrated communities. As well, when developers send proposals for funding, we will change our evaluation criteria for community development grants. The evaluation criteria will require developers to look to areas of high opportunity to place affordable housing.

We are happy to be a part of policy conversations and engage with our strong advocacy community. But the strongest voice to reach our elected officials is their constituents; you can talk to your councilmember or state representative and let them know the needs in your community.

- If areas of town like Green Hills say no to these developments like we said no, are you going to go ahead with these projects like you have here?

We don't own any property in Green Hills and other areas, so we don't have anywhere to go there. The areas with the highest concentration of poverty are where we own properties. We need to review our strategies for where we develop and what we put there.

- Specific to the County Hospital Road Bordeaux Hills project, in spite of what the newspaper article said about moving forward, the project is dead. The project can go before planning but Councilman Leonardo will not approve zoning changes because his constituents don't approve. Councilmembers in Districts 2 and 5 are also saying publicly that until there is some balance in the distribution of inclusionary housing in Nashville, they will not rezone low-income housing in their districts.

[MDHA acknowledged this comment but did not respond.]

- Is there a policy in place at MDHA for owners to maintain or retain residents when tax credit or Section 8 properties are sold to private entities? The housing crisis is being intensified when properties change hands and voucher holders are pushed out of housing.

MDHA does not own these properties, and there is not a tool we have to purchase those properties because it takes resources not at our disposal at this time. Our Rental Assistance Department does have tenant protection vouchers, which work with residents to find housing that will take a voucher.

MDHA agrees that this is a serious problem. One of our strategies included in the report is to explore financial and legal resources along with the city to address displacement of voucher holders.

- Is there any way to find out what projects have already been green-lighted for this area?

We don't track all projects, but it is possible your Councilmember knows more through permits listed by the Planning Department.

- Related to your list of contributing factors, can you define source of income discrimination?

Source of income discrimination happens when a landlord denies housing to a potential tenant because of the type of income the tenant has to pay rent. For example, in a situation where someone who only has a voucher or lives off SSI, the landlord will question the potential tenant's amount of extra income after rent to pay for utilities and will prefer a renter with higher income.

- How do you explain when your Director said he wanted to keep the poverty rate below 30% in areas of downtown, and therefore, there wouldn't be any affordable housing? How do you explain that? If you don't want to concentrate poverty there, we are at the threshold, we're passed it. What mechanism was used because we want the same mechanism here?

We can't speak to a statement made by someone else, but we will be happy to take your comment back.

- With the way things were done downtown, how are you going to transfer that type of development here?

Related to County Hospital Road, there is a redevelopment district that has a different land use plan for the whole district with mixed-income and commercial build-in. There is a second type of project built into the district that includes housing developments.

- Are the guidelines that MDHA uses the same as the federal guidelines for income limits?

MDHA uses the federally-set income limits for Section 8 housing, grant programs, and the federal poverty rate, which are all updated annually by HUD.

- In the sense of a big or “real picture”, how are you working with tools for other counties – How are the trends in terms of inter-county housing concerns and movement going to be addressed by this plan?

Low Income Housing Tax Credits (LIHTC) is a financing tool the IRS gives to the State of Tennessee; it has a maximum income limit of 60%AMI. That is not a tool MDHA administers. It is administered by THDA.

Tax Increment Financing is not a housing development tool specifically; instead, it is a financing tool for different types of development. It is not tied to income; a loan is secured based on a loan on future property taxes to help the property be developed

- What’s the process for getting a redevelopment district?

Under State law, a community must meet a blight definition to qualify as a redevelopment district.

- So if your graphs and maps are showing that this area is already saturated, what’s the strategy to keep from adding more low-income housing?

THDA has an annual plan on how they allocate LIHTC funds to cities; one strategy from this report is to comment on the plan related to how these funds can be used for housing in areas of high opportunity and not place housing so close to other tax credit properties.

- As a small business owner, it’s hard to attract business because with affordable housing incomes at 60% AMI or below, many people don’t have the disposable income to buy goods and services. If we continue to add more people under that income level, we won’t break the cycle poverty or increase investment.

We received that comment at a meeting here, and it is reflected in our document. We have goals on increasing private investment in under-served areas of the county and having more equitable affordable housing in other parts of the county.

- Right now federal funds such as HOME and CDBG funds are on the chopping block. If those federal funding streams are no longer available, how will MDHA respond locally without the federal streams, and how does MDHA build or incentivize in high opportunity areas without those funds?

We won’t have the money to do it. Other than public housing, we don’t have another set of funding for community development. It’s important to talk to our members of Congress.

- The Mayor's Office has released its Housing Nashville report that duck tales on this report Even with the federal resources, the Mayor's Office is hoping to take this information and using it as we think about local tools to create as well. It's important to mention that this plan is for Metro.

[MDHA acknowledged this comment but did not respond.]

- How is MDHA and these statistics going to reconcile with the Mayor's concept of YIMBY?

This is why we need to do a robust campaign on YIMBYism. Educating the citizens on affordable housing, what it means, and the equity development piece. Bringing affordable housing in areas of opportunity and bringing opportunities to areas that are saturated with affordable housing.

AFH Public Hearing | East Library

MDHA held a public hearing on Thursday, June 8, 2017 at 6 p.m. at East Public Library. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft. Below is a summary of questions and comments received and MDHA's responses.

- What does the expansion of the protected classes issue mean?

Metro Nashville created an employment ordinance that extended protection to sexual orientation including gay, lesbian, and transgendered citizens; the State of Tennessee responded to this ordinance with a state law that prohibits creating a protected class greater than the State of Tennessee. HUD programs have the Equal Access Housing Rule, which extends to sexual orientation.

- Related to disability, there is a trend where agencies who work with blind students, for example, are seeing an increased number of clients with developmental issues where blindness is a contributing factor; staff members are not always trained to help disabled students with brain injuries or developmental issues. Is this more of a service issue or training issue?

This issue relates back to the lack of community-based services factor. The Olmstead Act from 1999 also required public agencies to integrate services, and that could be a factor. The lack of sufficient case management is an issue noted in the report as well.

- When females are considered as heads of household, did you look at the contributing factor of male incarceration?

Some of the comments in our appendix reflect this issue, but we did not address the issue in our narrative, and we did not collect data on incarceration as a contributing factor. We will gladly take any public comments on this issue to add to our draft.

- The issues of male incarceration and police targeting factor into female heads of household with already low income also being subject to gender-based pay equity factors. All of these issues cycle around and impede a woman's efforts to get her family out of a bad situation.

Since HUD guidelines for this report do not focus on workforce issues like equal pay analysis, we did not analyze workforce issues as a part of this report. But these factors are important to consider as we create programs and opportunities to support women and children in public housing.

AFH Public Hearing | MDHA Board

MDHA held a public hearing on Tuesday, June 13, 2017 directly after the MDHA Board Meeting at 11:30 a.m. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft. Below is a summary of questions and comments received and MDHA's responses.

- When we are giving out incentives, try to focus on high opportunity areas to help people become more successful.

In our goals and strategies there are two themes, to incentivize investments in areas of opportunity and to bring investments to areas with high concentrations of poverty and minority concentrations to accomplish what you're talking about.

- What year was the data gathered from?

HUD data is from the ACS, which was pulled from different times depending on what was available. We have a link to the HUD data on our website which describes the data used for particular section.

- Under your metric, miles and timeframes, what is the process moving forward in evaluating yourself and reporting out?

In our next 5-year Consolidated Plan and the PHA plan, we will have to address the goals and strategies that come out of the final AFH. Outputs and outcomes will be reported in the Consolidated Plan and measured by HUD annually.

AFH Public Hearing | Hispanic Family Foundation

MDHA held a public hearing on Wednesday, June 14, 2017 at 5:30 p.m. at the Hispanic Family Foundation. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft.

No public comments were received.

AFH Public Hearing | J. Henry Hale Apartments

MDHA held a public hearing on Saturday, June 24, 2017 at 10 p.m. at John Henry Hale Apartments Community Room. The purpose of the public hearing was to take comments on the Assessment of Fair Housing (AFH) draft. Below is a summary of questions and comments received and MDHA's responses.

- Since the assessment has already been done, what exactly are you soliciting feedback for as far as the comments are concerned? Are you looking for feedback relating to your goals and strategies?

We're looking for feedback on any part of the draft including goals and strategies. If you feel like something was not reflected accurately or wish to substantiate another comment, please feel free to offer that feedback. The comments will all be summarized and included in an appendix. If we're asked to consider something, we will provide a response in the comment section; we will note how we treated it or why we did not address the issue.

The draft then is submitted for approval by the MDHA Board of Directors and then three readings at Metro Council.

- When you submit the draft to HUD, what is their role in the process?

HUD will accept or reject the AFH report based on their criteria. We are the second round of submitters; some final submissions were rejected in the first round so that jurisdictions would go back and work on different aspects of the draft that needed improvement.

Ultimately when HUD approves the report, the goals and strategies from the AFH report are incorporated into the next Five-Year Consolidated Plan, which begins in June 2018. Each year MDHA releases an Annual Update to the Consolidated Plan (the Annual Action Plan), which shows how MDHA targets HUD funding for that year. Each year HUD measures how well the jurisdiction is progressing to meet its goals through this process; HUD asks if we are doing everything we said we would for fair housing in our programs. The Housing Authority is responsible for a similar process to incorporate fair housing goals into their programs.

- So affordable housing is not necessarily supported by the government, correct? What is the difference between affordable housing and subsidized housing?

Correct. Affordable housing is not necessarily supported by government funds as opposed to subsidized housing. All subsidized housing is affordable but not all affordable housing is subsidized.

- Are there goals related to how we transition people from the need for subsidized housing into unsubsidized housing? That helps satisfy a demand as well.

One of our goals is increasing self-sufficiency by equipping residents with tools especially related to digital inclusion. Many job opportunities and training are online and many people need better access to those tools. Self-sufficiency also includes increasing access to financial literacy and homeownership counseling. One of our goals also relates to financial counseling specifically for youth.

- I missed some points you made related to barriers to opportunity contributing factors. One of them is the location of environmental hazards. You mentioned landfills, drug courts, and what was the third?

Prisons.

- When you talk about a lack of fair housing enforcement and outreach resources, you listed lack of local fair housing enforcement. Is this enforcement for people who are violating fair housing standards?

Yes, this relates to enforcement for provisions of the Fair Housing Act. The Fair Housing Act generally protects residents involved in private and public sector housing transactions and programs; it also protects documented and undocumented residents. It's a big umbrella even beyond what the HUD-funded programs cover for fair housing.

- What are in the goals related to segregation in areas like Bordeaux and North Nashville?

There has been a misconception on what the AFH is designed to do: the report is designed to create choice but not force. We're not trying to force people to move to just create integration; if someone wants to continue to live in an area, we want them to have that choice. But if a person chooses to live in other parts of the city, we would like to create that choice. The report is clear in showing that the segregated areas of the county have the least access to opportunities; so we want to help bring opportunity to these areas where people choose to live. These goals are designed to promote choice and opportunity.

- I really thought there was more local enforcement for fair housing.

There really isn't. Metro's Human Relations Commission doesn't have enforcement powers, and they deal more with Metro employment-related matters. The Fair Housing Council has typically been the go-to for fair housing matters but they are not affiliated with any government entity; they have a new executive director and are looking to strengthen their efforts.

- Related to the goals and strategies, when are they measured or reviewed in the report? Is it during the next assessment?

We incorporate the goals and strategies from this report in our Five-Year Consolidated Plan. While we have the Five-Year umbrella, each year we do an Annual Plan where we have a fair housing goal section. So these goals and objectives are measured annually and reported to HUD along with a public comment period.

From: [Angela Hubbard](#)
To: "Susan Adams"
Subject: RE: fair housing assessment meeting in Bordeaux
Date: Monday, June 05, 2017 3:53:27 PM

Susan,

Thank you for your comments. I look forward to seeing you at the meeting tomorrow night.

Kind regards,
Angie

Angela C. Hubbard

Director of Community Development
Metropolitan Development and Housing Agency
712 South Sixth Street
Nashville, TN 37206
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Email: ahubbard@nashville-mdha.org

From: Susan Adams [mailto:flipadams@yahoo.com]
Sent: Monday, June 05, 2017 2:49 PM
To: Angela Hubbard
Subject: fair housing assessment meeting in Bordeaux

Dear Ms. Hubbard,

We are looking forward to the meeting held at the Bordeaux library tomorrow to discuss further the assessment of fair housing and learn the process in which MDHA allots for funds, and in which areas projects are placed throughout Nashville.

In some areas of the city, such as East Nashville, Nations and 12 South, a small amount of affordable housing options have been made available through MDHA, with development blending in with housing at a much higher cost. These MDHA developments have the look and quality of building that would be desirable for the areas aforementioned, and therefore a welcome addition to a transitioning neighborhood.

However, it is painfully obvious to the Bordeaux/North residents, based on recent MDHA proposals, that MDHA is conveniently falling short on the quality of developments in districts 1 and 2, with a significant higher number of units. This is the perfect recipe for concentrated poverty. Not the nurses, teachers, firefighters and policemen typically used for justification for low income development by predatory developers. I would imagine if you polled around with these hard working professionals, they would opt for something much much better.

Concentrated poverty in no way makes for a livable and sustainable community. Why do low income developments never make it into high income areas where there is a

great deal of support for those in need? If you follow the money it most likely would be those higher income areas precisely perpetuating this disastrous cycle of no income, low income districts, underfunded schools, or infrastructure that never sees a single tax dollar. The kind of community where people can't even afford to mess up once.

Ms. Hubbard, I am sure you will agree, that the need for a fair and balanced approach is in order for districts 1 and 2. If Bordeaux/North is being approached by MDHA for new developments, then we would gladly join you in a diplomatic conversation moving forward.

Please feel free to contact me anytime.

Sincerely,
Susan Chiles
Rivercliff Drive
615/489-3672

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From: [Angela Hubbard](#)
To: "Mike Peden"
Subject: RE: Meeting Reminder & Extension of the Public Comment Period: Assessment of Fair Housing
Date: Tuesday, June 13, 2017 8:25:33 AM

Good morning, Mr. Peden,

We record all of our public hearings to assist us in transcribing the comments that will be included as an Appendix at the conclusion of the public comment period. This was the context in which I mentioned that the meeting was being recorded. However, we have made the audio recording available at: http://www.nashville-mdha.org/wp-content/uploads/2017/06/6-06-Draft_PubicHearing_Bordeaux.mp3, and we will make the audio recordings of the subsequent public hearings available online as well. The first public hearing was filmed for the purpose of providing an opportunity for those who cannot attend a public hearing to view the presentation we make at public hearings, and that video is available online as well. We have three more public hearings at which members of the public can make oral comments, and we will accept written comment until Noon on Monday, July 10, 2017.

Kind regards,
Angie Hubbard

Angela C. Hubbard
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Fax: (615) 252-8533
Email: ahubbard@nashville-mdha.org

From: Mike Peden [mailto:mike.peden@gmail.com]
Sent: Monday, June 12, 2017 8:22 AM
To: Angela Hubbard
Subject: Re: Meeting Reminder & Extension of the Public Comment Period: Assessment of Fair Housing

Ms. Hubbard - I have spoke with several people that attended this meeting and they were all told that the meeting was being recorded. Why were they told that? I don't understand why the comments from that meeting are not being made available.

Again, if you have a recording of this meeting I want a copy of it. If you do not, then please explain why the audience was told it was being recorded and that it would be made available.

If you cannot produce this recording, then I believe another meeting needs to be held in Bordeaux.

Best Regards
Mike Peden
615 390-4032

On Fri, Jun 9, 2017 at 5:50 PM, Mike Peden <mike.peden@gmail.com> wrote:
there were no comments from the audience on the meeting that you taped. Where there
comments at the meeting in Bordeaux?

On Fri, Jun 9, 2017 at 4:48 PM, Angela Hubbard <ahubbard@nashville-mdha.org> wrote:
Only the first public hearing was filmed.

Sent from my Verizon 4G LTE Droid

On Jun 9, 2017 4:38 PM, Mike Peden <mike.peden@gmail.com> wrote:
Hello - I would like to view the meeting that was held at the Bordeaux Library earlier this
week. Can you please send that link to me?

Thanks
Mike Peden
[615 390-4032](tel:6153904032)

On Fri, Jun 9, 2017 at 3:27 PM, Angela Hubbard <ahubbard@nashville-mdha.org>> wrote:
Good afternoon,

Attached is the public notice extending the public comment period for the Assessment of Fair
Housing to Noon on Monday, July 10, 2017. Also, we've added another public hearing to be
held at 10:00 a.m., Saturday, June 24, 2017, at the John Henry Hale Apartments Community
Room, 1433 Jo Johnston Avenue, Nashville, 37203. You can view the first public hearing at:
<https://www.youtube.com/watch?v=uWMwa9WjAvA&feature=youtu.be> or you can check
the Broadcast Schedule for the Metro Nashville Network (the link is provided below). As a
reminder, two public hearings will be held next week.

Tuesday, June 13, 2017
Immediately following
the MDHA Board meeting
which begins at 11:30 a.m.
MDHA Collaboration Center
Gerald F. Nicely Building
701 South 6th Street
Nashville, TN 37206

Wednesday, June 14, 2017
5:30 p.m.
Hispanic Family Foundation
3927 Nolensville Pike
Nashville, TN 37211

Please help us make sure all residents of Davidson County know about this report and these

meetings, and share this email and public notice with your friends, neighbors, and colleagues. You can also share our social media posts. Please follow us on Facebook (<https://www.facebook.com/NashvilleMDHA/>) and Twitter (<https://twitter.com/NashvilleMDHA>).

Thank you and have a great weekend,
Angie Hubbard

Please contact our office if you are not able to access information on our website.

Angela C. Hubbard
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Email: ahubbard@nashville-mdha.org<mailto:ahubbard@nashville-mdha.org>

From: Angela Hubbard
Sent: Monday, June 05, 2017 5:03 PM
To: FairHousingPlan
Subject: Meeting Reminder: Assessment of Fair Housing available for review & comment

Good afternoon,

I wanted to remind you that we have 2 public hearings this week on the Assessment of Fair Housing; information is provided below and in the attached public notices. As soon as we have the YouTube link from the hearing that was held on 6/1/2017, I'll forward it along. Also, you can check the Broadcast Schedule for the Metro Nashville Network: <http://www.nashville.gov/Information-Technology-Services/Cable-Television-Services/Metro-Nashville-Network/Broadcast-Schedule.aspx>.

Tuesday, June 6, 2017
5:30 p.m.
Bordeaux Library
4000 Clarksville Pike
Nashville, TN 37218

Thursday, June 8, 2017
6:00 p.m.
East Library
206 Gallatin Road
Nashville, TN 37206

Please visit our website at <http://www.nashville-mdha.org/?p=2011> for information about the Assessment of Fair Housing and to view the draft report.

Kind regards,

Angie Hubbard

Please contact our office if you are not able to access information on our website.

Angela C. Hubbard
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Email: ahubbard@nashville-mdha.org<mailto:ahubbard@nashville-mdha.org>

From: Angela Hubbard
Sent: Tuesday, May 30, 2017 6:37 PM
To: FairHousingPlan
Subject: Assessment of Fair Housing available for review & comment

Dear Friends,

Thanks to all of you who provided input on the development of the draft Assessment of Fair Housing (AFH). I wanted to make sure that you knew that the draft AFH is available for review and comment. This link will take you to the AFH webpage where you can download the document: <http://www.nashville-mdha.org/?p=2011>. The attached public notices provide details on how to submit comments as well as information about the 5 public hearings we'll have on the draft. The draft AFH was made available online Friday morning instead of Wednesday, so we will issue another notice to extend the comment period to Noon on Monday, July 10, to comply with our 45-day requirement. Our first public hearing this Thursday will be filmed and shown on the Metro Nashville Network throughout the comment period. Once we have the YouTube link, we'll post it on our website and send it out via email.

Kind regards,
Angie Hubbard

Please contact our office if you are not able to access information on our website.

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From: [Angela Hubbard](#)
To: "Susan Adams"
Subject: RE: Request for recording of the Bordeaux Library meeting
Date: Tuesday, June 13, 2017 8:17:49 AM

Good morning, Ms. Chiles,

In case you did not receive the automatic replies to the emails you sent on Friday evening or yesterday, I was out of the office yesterday with limited access to email, which is why I did not respond yesterday. You may access the audio recording of the public hearing held at the Bordeaux library on June 6, 2017, through the following link: http://www.nashville-mdha.org/wp-content/uploads/2017/06/6-06-Draft_PubicHearing_Bordeaux.mp3.

Kind regards,
Angie Hubbard

Angela C. Hubbard
Director of Community Development
Metropolitan Development and Housing Agency
712 South Sixth Street
Nashville, TN 37206
Office: (615) 252-8507
Fax: (615) 252-8533
Email: ahubbard@nashville-mdha.org

From: Susan Adams [mailto:flipadams@yahoo.com]
Sent: Monday, June 12, 2017 9:17 AM
To: Angela Hubbard
Subject: Request for recording of the Bordeaux Library meeting

Ms. Hubbard,
On Friday I submitted a request of the fair housing assessment meeting recording held at the Bordeaux Library on June 6 2017 and would like a response from you today when I will receive it.
I would appreciate a timely reply from you today.
Sincerely,
Susan Chiles
615/489-3672

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From: [Angela Hubbard](#)
To: "[Eddie Latimer](#)"
Subject: RE: your fair housing priorities
Date: Tuesday, June 13, 2017 8:33:01 AM

Thank you, Eddie. We will not be able to achieve these goals and address these issues without our nonprofit partners!

Angela C. Hubbard

Director of Community Development
Metropolitan Development and Housing Agency
712 South Sixth Street
Nashville, TN 37206
Office: (615) 252-8507
Fax: (615) 252-8533
Email: ahubbard@nashville-mdha.org

From: Eddie Latimer [mailto:edlatimer@ahrhousing.org]
Sent: Friday, June 09, 2017 9:27 AM
To: Angela Hubbard
Subject: your fair housing priorities

Angie

I just read your F H priorities which came from all your meetings. It is well done. Thank you
However AHR can pitch in let us know.

Eddie Latimer
CEO
Affordable Housing Resources, Inc.
50 Vantage Way, Suite 107
Nashville, TN 37228
phone 615.251.0025 ext. 0
fax 615.251.0143
email elatimer@ahrhousing.org



Creating affordable housing and strong neighborhoods.

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MEMORANDUM

To: Metropolitan Development and Housing Agency
From: Mayor's Office of Housing
Re: Recommended Comments for 2017 Assessment of Fair Housing – June 29, 2017

Purpose

The goal of this memo is to support the research of the Metropolitan Development and Housing Agency (MDHA) in the work on the 2017 Assessment of Fair Housing document. As a quick reference, the recommendations are for Section V titled Fair Housing Analysis. Recommendations for the report are as follows:

1. Supportive Research
2. Expansion of subjects
3. Edits (grammatical or otherwise)

Recommendations for Section V. Fair Housing Analysis

V.B.-1: Suggestion to include source of reports on Nashville's population increase versus stating "there are reports..."

Reference to this statement is made in V.A.2, second paragraph.

V.B.-10: Suggestion to include information about the Barnes Housing Trust Fund.

In 2013, the [Barnes Housing Trust Fund](#) was created as Metro Nashville's first housing trust fund to leverage affordable housing developments countywide. Named after Reverend Bill Barnes, a longstanding advocate for affordable housing and the deconcentration of poverty, the Barnes Fund provides funding to nonprofit developers to build affordable housing. In July 2016, Mayor Barry increased the funding of the Barnes Fund to \$40M over the course of four years, with an annual commitment of \$10M from the Mayor—the largest investment to date. The Barnes Fund has invested over \$14 million in affordable housing using Barnes Fund and leveraged over \$50M with federal and private funding sources, funding more than 500 housing units. The Barnes Fund currently has one dedicated funding source through fees from Short Term Rental permits. To date, the Barnes Fund has received over \$600,000 in dedicated funding.

This statement has been incorporated.

V.B.-12: Suggestion to include data and Nashville - specific instances such as the following examples to support the contributing factors identified during the community engagement process:

1. Community opposition:

“One of the most enduring myths about affordable housing is that it will decrease housing values in a neighborhood.” (*New Look of Affordable Housing- Nashville.gov*)

This statement has been incorporated.

2. Displacement of residents:

“As housing costs increase, residents become cost burdened and must seek more affordable housing elsewhere. In many neighborhoods this has resulted in the displacement of residents, and drastic neighborhood change as existing homes are upgraded or replaced with new construction.” (*HUDII - 190 Adopted June 22, 2015 Housing*)

This statement has been incorporated.

3. Lack of public investments:

“Only about half of Nashville’s roads currently have sidewalks, and no one knows where to find the money to cover the rest of them. The [sidewalk situation](#) even became a point of contention in last year’s mayoral campaign.” (*Martin, Rachel. “Walking in Nashville.” City Lab. 6, Jan. 2017*)

This statement has been incorporated.

5. Lending Discrimination:

“But now, First Tennessee has run afoul of HUD lending rules again, as HUD announced Monday that it reached a settlement with First Tennessee over allegations that the bank violated the Fair Housing Act by discriminating against African-American and Hispanic mortgage loan applicants by denying them mortgage loans, and by allegedly failing to place bank branches in minority-concentrated areas.” (*Lane, Ben. “First Tennessee Bank reaches \$1.9 million settlement over discriminatory lending.” Housing Wire. 1, Feb.2016.*)

This statement has been incorporated.

V.B-16: Under section 2 there is a typo in the first sentence of the explanatory paragraph, it should be *R/ECAPs* is provided.

This has been corrected.

V.B-16 and 17: We suggest adding the following to Section 2 b:

Nashville is a welcoming city where entrepreneurs find an integrated support network to launch and grow a business. The mission of our program is to encourage local business development and job creation by connecting business owners to technical, financial and market resources. The Office of Economic and Community Development works to provide [competitive incentives](#) for small businesses. (*Nashville.gov/mayor’s office- small business development and entrepreneurship*)

This statement has been incorporated.

V.B-17: The following supports the contributing factors mentioned by residents:

The mission of the Mayor's Office of Neighborhoods is to improve the quality of life in Nashville's neighborhoods through a more informed, active and involved citizenry and enhanced governmental response to community needs. Old, deteriorated, neglected buildings are bad for the city as a whole; therefore the problem should be addressed.

This statement has been incorporated.

V.B- 27: Suggestion to add more details about the programs of the Nashville Career Advancement Center:

The Nashville Construction Readiness Partnership (NCRP) is a collaborative initiative of Mayor Megan Barry to assist citizens of Nashville in jump-starting their construction industry career. This [initiative was created](#) to ensure the citizens of Nashville have the access and skills needed to engage in Nashville's vibrant construction industry. The NCRP will develop and implement strategies that match employers with skilled Davidson County employees, and provide training opportunities for residents seeking to enter the industry for the first time. (*Nashville.gov- NCAC*)

This statement has been incorporated.

V.B-38: The following are edits and suggestions for this page:

1. All references to the Office of Economic Opportunity and Empowerment should be changed to the Office of Housing and the following blurb can be used:

This has been changed.

The Mayor's Office of Housing assists Mayor Barry in the building, funding, and preservation of affordable housing options, while supporting efforts to prevent displacement and create mixed-income communities in Metro Nashville. The Office seeks to increase housing affordability countywide using data-driven policy and innovative development tools including the Barnes Fund for Affordable Housing, Housing Incentives Pilot Program, general obligation bonds, tax abatement, nonprofit capacity building, the creation of a community land trust, and the donation and development of Metro-owned properties. The Office of Housing also facilitates partnerships and implements policies that provide housing options for persons experiencing homelessness to those looking to stabilize their families with affordable homeownership opportunities.

This statement has been incorporated.

2. Include more information on the Metropolitan Homelessness Commission:

The Metropolitan Homelessness Commission is Metro's planning and coordinating entity that brings advocates, nonprofit organizations, for-profit business leaders, government agencies, and the general public together to collaborate on solutions for homelessness in Nashville. In June of 2014, the Metro Council approved [Ordinance BL2014-777](#), which establishes the Homelessness Commission as a permanent body of the Metropolitan government.

The new ordinance outlines the following duties and responsibilities for the Homelessness Commission:

- To implement a coordinated and focused approach to ending homelessness and to develop measurable goals;
- To assure participation of all stakeholders including homeless persons;
- To maintain accurate, current data on homeless populations; and
- To educate the public, service providers and other interested parties on issues related to homelessness.

Information about the Metropolitan Homelessness Commission has been added in V.D.

V.B-47: Suggestion to add under the Housing Incentive Pilot Program:

In 2013, the [Barnes Housing Trust Fund](#) was created as Metro Nashville’s first housing trust fund to leverage affordable housing developments countywide. Named after Reverend Bill Barnes, a longstanding advocate for affordable housing and the deconcentration of poverty, the Barnes Fund provides funding to nonprofit developers to build affordable housing. In July 2016, Mayor Barry increased the funding of the Barnes Fund to \$40M over the course of four years, with an annual commitment of \$10M from the Mayor—the largest investment to date. The Barnes Fund has invested over \$14 million in affordable housing using Barnes Fund and leveraged over \$50M with federal and private funding sources, funding more than 500 housing units. The Barnes Fund currently has one dedicated funding source through fees from Short Term Rental permits. To date, the Barnes Fund has received over \$600,000 in dedicated funding.

This statement has been incorporated.

V.B. -48: Suggestion to support residents’ opinion with factual information versus leaving only their views.

Where applicable, additional information has been added. However, the data included in the report supports residents’ opinions, and residents are the best gauge of what is occurring in their neighborhoods .