

# NEBRASKA FAIR HOUSING STRATEGY

## 1997-2000

**Nebraska Department of Economic Development**

Division of Community and Rural Development

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## Introduction

The State of Nebraska, in compliance with the U.S. Department of Housing and Urban Development (HUD) and the Consolidated Plan Final Rule (24 CFR Part 91, et al) is required to develop a fair housing plan for the non-entitlement parts of the state; the Consolidated Plan also requires that this plan be reviewed under the citizen participation process. The purpose of the plan is to foster a careful examination on a statewide basis those factors which restrict or preclude fair housing choice.

HUD's definition of "fair housing choice" means the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income to have available to them the same housing choices.

The Nebraska Department of Economic Development has a dual responsibility in fair housing:

1. To undertake fair housing planning at the state level in a collaborative manner with other organizations who are also concerned with the issues, rather than create new bureaucracies.
2. To build capacity in order to insure that the Community Development Block Grant (CDBG) and HOME grantees comply with their certifications to affirmatively further fair housing.

In approaching this analysis, it was appropriate to consider impediments that may exist within existing state laws, regulations and administrative procedures affecting the location, availability and accessibility of housing, as well as public and private conditions that affect fair housing choice, particularly for persons having low and moderate incomes.

The plan focuses on how the Department of Economic Development, consistent with the various mandates existing for the programs it administers, can accomplish the goals and objectives for making fair housing choice a reality for all Nebraskans.

## Section I

### Analysis of Impediments to Fair Housing Choice

Because the State of Nebraska is committed to fair housing choice for all its citizens, the State Department of Economic Development (the Department) has conducted an assessment and analysis of impediments to fair housing for the non-entitlement areas of the State. Impediments to fair housing choice may be defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choice. It is the Department's position that this analysis serve as a logical basis for the four-year fair housing plan; further it provides information to increase awareness, build capacity and support for fair housing in Nebraska.

This assessment involved the use of existing statistical data, including the Housing and Community Development Plan 1995-2000, the Nebraska Equal Opportunity Commission's 20<sup>th</sup> Biennial Report, Fair Housing plans from Lincoln and Omaha – the State's two entitlement cities, various local housing plans, and guidance documents issued to participants of programs over which the Department has administrative responsibility, principally the Community Development Block Grant and the HOME programs. The assessment also included a review of state laws, regulations, and administrative procedures which may have impact on fair housing issues. A complete bibliography of literature reviewed is listed in the Appendix to this document.

Methodology for research prior to analyzing impediments included interviews with individuals representing public housing authorities, local governments, housing advocacy groups, minority services groups, concerned citizens, and other individuals active in housing issues in the State, as well as a thorough review of newspaper articles, publicly and privately conducted studies on housing issues in Nebraska and nationwide, and materials related to housing concerns gathered throughout the State. A listing of individuals interviewed and literature reviewed appears in the Appendix.

### REVIEW OF STATE LAWS IMPACTING FAIR HOUSING

Nebraska state laws are in place to prohibit discrimination against certain classes of people in the areas of employment, housing and public accommodations and to protect those who are victims of discrimination.

Those laws include the Nebraska Fair Employment Practice Act (Neb. R.R.S. 1943, Sections 48-1101 -48-1125), the Equal Pay Act of Nebraska (Neb. R.R.S. 1943, Sections 48-1219 –48-1227), the Act Prohibiting Unjust Discrimination in Employment Because of Age (Neb. R.R.S. 1943, Sections 48-1001 – 48-1010), the Nebraska Fair Housing Act (Neb. R.R.S. 1943, Sections 20-301 – 20-344), and the Act Providing Equal Enjoyment of Public Accommodations (Neb. R.R.S. 1943, Sections 20-132 – 20-143).

In 1965, the Nebraska Legislature created the Nebraska Equal Opportunity Commission (NEOC), which was gradually given enforcement authority over the five statutes listed above.

The Fair Housing Act enforced by the commission is substantially equivalent to the Federal Fair Housing Law. According to its 20<sup>th</sup> Biennial Report issued in February of 1995, about five percent of NEOC's caseload is the handling of fair housing complaints. These complaints focused on failure to show rental properties, terms of occupancy, and evictions. Complaints arising from any housing assisted by funding through the U.S. Department of Housing and Urban Development (HUD) are addressed by the HUD Area Office in Omaha. Of the 97 complaint cases referred to HUD in FY 94, the primary complaints dealt with financing, refusal to rent, and terms and conditions.

In 1991 a class action suit, Hawkins v. Cisneros, was brought against HUD, the Omaha Housing Authority and the City of Omaha, for violations of the U.S. Housing Act, Title VI of the Civil Rights Act of 1968, as related to the development and the administration of Omaha's public housing, in violation of the Fifth and Fourteenth Amendments to the Constitution of the United States and other federal statutes, regulations and guidelines. The settlement agreement, signed in 1994, required that the several hundred displaced from the Logan Fontenelle Homes (public housing) be provided with counseling and residential mobility assistance, relocation assistance payments, an opportunity to have additional assistance through Section 8 vouchers and certificates, and assistance to find housing in non-impacted (less than 35 percent minority population) areas. By May of 1995, more than 200 persons were placed in housing in various areas of the city. Assistance to the displaced is being handled by the Family Advisory Services Inc. and funded through a HUD grant.

In 1974, the Nebraska legislature passed the Uniform Residential Landlord and Tenant Act, which governs oral and written agreements for residential property, and places certain restrictions on what may be included in a lease. It also defines minimum duties of landlords and tenants. Another law addresses the landlord-tenant responsibilities relating to mobile homes.

In the early 1980s, the Department of Economic Development was designated to administer the federally-funded Community Development Block Grant program; a portion of these funds annually are spent on housing rehabilitation. Later, the Department also assumed responsibility for administration of the HOME program, another federally funded effort to improve and expand housing opportunities for persons with low and moderate incomes. Consistent with the federal Tax Reform Act of 1986, enabling legislation was passed creating the Nebraska Investment Finance Authority (NIFA). Between 1987 and the end of 1994, NIFA has, through its Low Income Housing Tax Credit Program, encouraged the investment of private capital in the development of more than 4,600 low-income, affordable, rental units throughout the state. During the same period, NIFA funded 35,315 mortgages for single-family residences for Nebraskans with low and moderate incomes to ensure decent, safe and sanitary housing.

These are the primary laws and programs, stemming from statutes, that address housing issues for the state of Nebraska. It appears that these laws not only prohibit discrimination and further fair housing choice, but also foster the expansion of housing stock for persons having low and moderate income, thus increasing the opportunities for fair housing choice.

However, after setting out the parameters within which local governments must operate, Nebraska statutes appear to vest primary authority and responsibility for housing with local governments. Issues which may most heavily impact location, availability and accessibility of housing – such as planning, zoning, subdivision regulations, building and occupancy codes, are left to local governments to determine.

Therefore, a city-by-city examination of local ordinances may be in order to determine the extent to which fair housing choice is available to citizens with low and moderate incomes.

## DEMOGRAPHICS

Although Nebraska experienced a net out-migration of people between 1970 and 1990, that trend reversed in 1990, when over 2,000 persons moved into the State. When added to the natural population increase, the state's population increased to 1,593,377 by 1991. Census estimates indicated the state's population increased to 1,600,524 by 1992 and 1,622,858 by 1994. (See Table 1). The 1996 census estimates the state's population at 1,652,093.

This gradual but continual growth is evident in 45 of the State's 93 counties. Fifty-four percent of the growth took place outside the city limits of the entitlement cities, Lincoln and Omaha. The population growth of 16 rural counties equaled or exceeded the average overall State increase of 2.8 percent, with all counties along the I-80 corridor, except Keith County, experiencing some population growth. (See Map 1).

A particular item to note is the white (non-Hispanic) population experienced a loss of -4.16 percent between 1980 and 1990, but minority groups which represented 4 percent of Nebraska's rural population experienced high growth rates in the 1980s. Growth rates ranged from 24.4 percent for Hispanics to 52.3 percent for Asian and Pacific Islanders. Hispanics are the largest rural ethnic group representing 2 percent or nearly 23,000 residents of Nebraska's non-entitlement population. It appears that minority groups are drawn to rural parts of the state for employment reasons, since this is where many of the meat packing and food processing industries have chosen to locate. Should minority growth rates continue through the 1990s, minorities could constitute almost 6 percent of the non-entitlement population of the state.

Nebraska's 1990 median family income of \$31,644 is 12 percent below the national median family income of \$35,939. Rural or non-metropolitan median family income is \$25,444 or 29 percent below the national median. One of every five rural Nebraska households have "very-low incomes" of less than 50 percent of the state's median

income. Of all minorities, Hispanics have the greatest number of households below 50 percent of the state median family income. Native American households are the second ethnic group most seriously impacted by “very-low incomes” in non-entitlement areas.

Population in the non-entitlement areas of the State is expected to increase by an estimated 41,560 persons, or 3.7 percent by the year 2000. As with population, the number of households will increase by 23,140, or over 54 percent by 2000; this, coupled with a trend of fewer persons per household, may exacerbate the housing problems of low-income Nebraska families, further reducing their choice of housing.

By the year 2000, an estimated 34.3 percent of non-metropolitan households in Nebraska will be renters; this is an increase from 29.4 percent in 1990 and 31.7 percent in 1995. Overall, the non-entitlement area of the State will increase an estimated 5,280 owner households and 17,860 renter households, between 1995 and 2000.

The figures above address only the trends for “permanent” Nebraska residents. Every year, in Nebraska’s Panhandle, 400-600 migrant families –predominately Hispanic— arrive in the state to work in the sugar beet industry, as seasonal agricultural labor. While growers provide limited housing for migrant workers, most migrant families must seek housing from private rental agents; many families have to share residential space, resulting in overcrowding.

Over the years, families who originally were migrants have settled in the Western counties. A sizable Hispanic population has developed in Scotts Bluff, Banner, Morrill, Box Butte, Sioux and Cheyenne counties. Additionally, Hispanics have settled the I-80 corridor counties: Keith, Perkins, Lincoln, Dawson, Buffalo, Hall and Adams. Jobs in the meat packing industry have been the magnet for minority population in this area. Meat packing jobs have drawn Hispanics, African Americans and Native Americans to Madison, Stanton, Colfax, Wayne, Dakota, Thurston and Burt counties in the eastern part of the state. (See Map 2).

African Americans are the predominant minority group in Douglas, Lancaster, Sarpy, Adams, Nemaha, Washington, Wayne and York counties. Although Native Americans live in almost every part of Nebraska, their presence is most felt in the counties where reservations and trust lands are located: Sheridan, Knox, Thurston, Burt and Richardson counties. Asian and Pacific Islanders, the fastest growing minority population between 1980 and 1990, have settled primarily in the eastern counties: Johnson, Gage, Saline, Lancaster, Sarpy, Douglas, and Dakota. Additionally, Hall County has a fairly large population of Asian minorities. (See Table 2).

## STATEMENT OF HOUSING CONDITIONS

Housing in the non-entitlement portion of Nebraska is based on many factors, including economic development activities along the I-80 corridor and the major regional service centers such as Norfolk. During the early 1990s, Nebraska saw both new business

development and the expansion of existing industries, particularly in the meat packing and food processing industries.

Economic growth and development has amplified employment opportunities and left many communities with the dilemma of insufficient housing for current and potential employees and their families. Future growth will be directly linked to each local community's ability to continue to increase employment opportunities, provide appropriate public services and, most importantly, enhance affordable housing opportunities.

The declining population in many Nebraska communities in the 1970s and '80s had a trickle-down effect on the condition of the housing stock. Housing is the fundamental need of every community and if a community begins to lose sight of this philosophy, or is unable to match the resources required to maintain their housing stock, the community will slowly progress through the process of decay. Many communities lack available rental housing. And when one of every five rural Nebraska households have "very-low incomes" (less than 50 percent of the state median income), there is little opportunity for home ownership for these families.

Nationally, and in Nebraska, industries are frequently looking to locate or expand into non-metropolitan communities. However, communities throughout the state are currently attempting to provide adequate and affordable housing, while trying to deal with a zero to one percent vacancy rate and manage problems of aging housing stock. Communities in various parts of the state have had tremendous economic activity, but have been unable to meet the additional housing demand. The result is that many individuals and families are living in substandard housing and/or overcrowded conditions. Many substandard housing units, that were not occupied previous to economic growth, are currently occupied in response to the low vacancy rates.

Housing demand and change in households are predominantly the single most influencing housing factor, followed by change in vacancies, units removed from the market, and housing costs. Local and regional economic trends also influence the housing industry.

A quick glance of Nebraska's economy may illustrate how jobs can impact the state's housing industry. In 1993, the Nebraska work force averaged 762,703 jobs per month, a 1.7 percent increase over the 1992 average. The trade sector, wholesale and retail, provided an average of 192,475 jobs per month. The service sector was the second leading provider of jobs with 187,753 per month, or 1.2 percent more than in 1992. The average number of manufacturing jobs totaled 102,935 or 2.2 percent more than in 1992. The finance, insurance and real estate sector provided 50,264 jobs and the transportation and communication sector provided an average of 47,079 jobs per month.

Jobs and population growth fueled the Nebraska housing industry during the early 1990s. Statewide, residential construction activity continued growing in 1993; the number of new residential units increased 13.6 percent over 1992. The number of new residential

units increased 13.2 percent in the state's six metropolitan counties and 14.6 percent in non-metropolitan counties. Non-metropolitan growth in residential construction exceeded the state average in the single-family house and in the three-to-four family building categories.

Housing construction is inconsistent throughout the state. Not all areas share equally in new building activity. Dawson County demonstrates the volatility of the housing industry in rural areas especially when an area is affected by significant job growth and in-migration. In the late 1980s, Iowa Beef Packing Inc. opened a meat packing plant in Lexington, creating thousands of jobs. Dawson County issued only 10 building permits for residential housing in 1989, but in 1990 it issued 71 permits, 52 of which were multi-family units. The county issued only 24 permits (three for multi-family) in 1992. In 1993, the number of residential unit permits issued was 86, of which 60 were for multi-family housing. Although significant growth has occurred in housing construction, that growth has been uneven from year to year.

It is of interest to note that lack of housing, because of its impact on the locations of various industries and the need to supply a pool of potential employees to those industries, has caused chambers of commerce, other civic groups, economic and industrial developers to acknowledge a link between housing and economic growth in a way that was certainly less overt and possibly non-existent in the past. Upwards of 50 local or multi-jurisdictional studies have been initiated since 1990 to assess and plan for the housing demand in non-entitlement areas of the state for the next five to ten years.

## **DELINEATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

Research of the literature, interviews with state and local administrators and decision makers, and site visits to various locations in the state revealed much about the existence, nature, and to a lesser degree, the extent and cause of several possible impediments to fair housing choice.

Both NEOC and HUD keep records of complaints of discrimination against individuals and families as it relates to housing rentals: refusals to show, refusals to rent, and term of occupancy. Public housing authority directors admitted that some landlords were wary of renting to holders of Section 8 vouchers or certificates. Others were not eager to rent to large families. This held true particularly for ethnic groups whose cultural history is to house several generations of a family – or an extended family – in a single residential unit. Where these larger families are able to find residential accommodations, there is frequently overcrowding and complaints of excessive noise from neighbors.

HUD complaints also include instances of discrimination against individuals who were attempting to obtain financing to purchase residential property. Although Home Mortgage Disclosure Act (HMDA) data could not be secured for non-entitlement areas of Nebraska, inferences can be drawn from a review of HMDA data from Lincoln and Omaha.

In Omaha, the data indicates that in 1990 minority groups experienced denial of loan applications at rates that exceeded the average for all racial groups combined. While the rate of loans originated and approved for whites averaged 83.7 percent, the rates for African Americans and Hispanics were 64.2 percent and 65.3 percent, respectively. However, rates for both American Indians (81.1 percent) and Asian/Pacific Islanders (85.5 percent) were higher than for all races combined (80.1 percent).

Although Lincoln's minority population comprised 5.5 percent of the City's total population, minority loans were originated and approved at an 85.1 percent rate compared to 89 percent for all non-minority households. Perhaps it is significant that statistics for race and gender were not available from Lincoln's lending institutions for another 2,844 loans applied for. This total is more than the absolute number of all minority loans approved by the City's lending institutions (1,110) from 1990 through 1993.

While state law prohibits discrimination, local policies – that is, planning, zoning, and occupancy ordinances, locally adopted building codes, etc. – must be examined in each community to ascertain the impact on fair housing choice. For example, it was discovered that one city refused to participate in NIFA's low income tax financing because "of the type of people it would bring to our town." Another local mayor publicly announced that he wanted "to build a wall around" the town so no more "foreigners" could move in. In this town, an ordinance was passed that no low income housing could be built within the city limits. Lending institutions appeared to be guilty of overt discrimination in another locale where a house was about to be purchased for use as a group home.

Although vacancy rates at HUD-assisted housing units are generally low across the state, some residential units go unoccupied because of the specific Federal law under which they were constructed. For example, in one community a high-rise apartment building for the elderly was constructed with HUD financial assistance; for various reasons, many of the elderly have chosen not to live there and apartments stand empty. However, since this housing was built as "elderly housing", it is not available to non-elderly low-income individuals and families, nor to individuals with disabilities because the locality has not sought a waiver from HUD which would allow occupancy by these additional groups.

While Nebraska's 1995 Consolidated Plan notes various instances of state agencies which coordinate public and assisted housing providers working with private/governmental, health/mental health agencies, the need for strengthened linkages is evidenced by Objective 2A of the Community Development Strategy. The strategy is to establish an active interagency working partnership to explore cooperation and coordination of services at the state level, including supportive service delivery.

Lincoln's Fair Housing Analysis identifies the deputy director of the Nebraska Real Estate Commission reporting that his office has never received a fair housing complaint against a Lincoln Realtor. And Omaha's Fair Housing Assessment identified no barriers in this area. However, residential patterns for low-income and minority households reveal

that some “steering” or influencing of a person’s choice of housing may have taken place. For a thorough analysis of related incidences in non-entitlement areas, each community will have to review local residential patterns and inquire of local Realtors.

Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly-assisted housing will have to be reviewed on a locality-by-locality basis. Interviews revealed that ordinances precluded the construction of low-income housing in a more favorable location. An assisted elderly complex receiving funds from the United States Department of Agriculture and Rural Development, was encouraged to and eventually located the complex in a flood plain.

Interviews also revealed that racial discrimination frequently goes formally unreported. One housing authority director received three informal reports from racially mixed couples in a single day who were discouraged by landlords while attempting to rent residential units. None wanted to file formal complaints. In another community, a city official said he felt his city was “maturing” after several years in its acceptance of an influx of Hispanics who moved into the area to work. He confirmed that racial bias still existed in his community but that its strength was declining as time passed. Community attitudes must be evaluated on an individual basis.

Perhaps the most critical barrier to fair housing choice is the scarcity of safe, sanitary, accessible and decent housing. This was echoed across the state by local officials. Housing stock that had declined during the 1980s and went unoccupied for a time is being lived in again, particularly in communities where a meat packing plant has located. Housing vacancies – for rent or sale – are rare in these communities. This forces the often-immigrant work force, arriving to fill available jobs, out into more rural areas and nearby towns and villages, exacerbating tight housing conditions throughout the county and encumbering workers with lengthy commutes. Although construction of both single-family and multi-family residential units is underway in many locations, it is not being completed quickly enough nor is it meeting the demand in a sufficiently uniform way to alleviate a serious housing shortage across the state.

## **ANALYSIS OF THE IMPEDIMENTS**

Impediments to fair housing choice might be best analyzed in the context of a typical Nebraska community in the 1990s. Anytown, Nebraska, population 4,500, is not an island on the High Plains but is impacted by the activity around it. It might be near an entitlement city, a bedroom community for city workers; it could be located near an Indian reservation; it might be across the county line from a meat packing plant; perhaps it is located in an agricultural area that attracts seasonal workers; or maybe it’s located on Interstate 80.

The housing market is very tight: a few homes falling into disrepair and becoming uninhabitable; few houses or apartments being built; vacancies for residential occupancy are rare and available units accessible to persons with disabilities are more rare. Activity

in the area is drawing potential workers into Anytown; some are immigrants, who bring their families—looking for places to live—as well as their customs, religion and their native language. A few of these new workers are African American, but most are Native Americans, Hispanic or of Asian background.

Anytown is not quick to embrace the newcomers. Potential landlords want to ensure that their renters are employed and that their properties won't be overcrowded. Communication is difficult for all parties because of language differences. Merchants tend to be cautious of these new families because they are mostly low income foreigners different from the cultural norm of the community.

These new working families fill various job vacancies and unoccupied housing—even if it's in decline. They also use the services of the community and the schools. Although many were not able to find housing within the city proper and have scattered into more rural areas nearby, their presence is still felt in the community. As the children learn to speak English in the public schools, they frequently translate for their non-English speaking parents.

Although both the State and federal governments prohibit discrimination, it does exist. In some instances, discrimination is exhibited by landlords and neighbors who don't want these newcomers on their properties or in their neighborhoods. Some discrimination is more subtle: a lending institution may accept applications from these new families, but rarely approve their loans. A new family with five children may approach a landlord about an apartment, known in the community to be vacant, only to be told that "it has just been rented."

The local chamber of commerce may view this influx of population as an economic boom and begin to plan for additional multi-family units, appropriate for the new workers. However, the City Hall Council may pass an ordinance that prohibiting low-income housing projects within the city limits.

## **RANKING OF IMPEDIMENTS TO FAIR HOUSING**

Ranking is based on severity of impact on individuals and families seeking housing in non-entitlement areas of Nebraska.

### *1. Scarcity of Affordable Housing*

The mid-1990s finds Nebraska woefully short of available housing, particularly for low and moderate income families. Workers who have moved to the state to take jobs in non-entitlement areas have serious difficulties finding *any* available housing. Vacancy rates for sales is about 1.7 percent, with slightly more rental property (8 percent) available.

Nearly 21,700 renter-occupied households have very low incomes and experience a cost burden: paying in excess of 30 percent of monthly household income for housing and related utility costs. If all available, vacant rental units were affordable to these very low

income households, rural Nebraska would meet only half the demand for affordable rentals. “Affordable” housing is typically defined as housing for persons/families of 80 percent of median income or less, where total housing costs do not exceed 30 percent of the tenant’s income.

Residential construction activity is booming; contractors are busy across the state. However, the need for additional housing far exceeds the ability of the construction industry to meet that need. The total estimated housing demand for the non-entitlement area of the State, 1995 to 2000, is 39,241. This will include an estimated 14,393 units of owner occupied housing and 24,848 units of rental housing. The largest estimated amount of affordable rental housing to be developed should be for families 2+ persons, followed by elderly housing and rental housing for persons with physical disabilities. An estimated 485 units of affordable rental units should be build for persons with a chronic mental illness, 250 units for person having developmental disability and at least 105 units of affordable rental units for persons experiencing HIV/AIDS.

2. *Discrimination based on race, color, religion, sex, disability, familial status, age and national origin.*

Although laws are in place that prohibit discrimination because of race, color, religion, sex, disability, familial status, age and national origin, bias still exists. It is carried out subtly through institutional practices or by one individual against another. Another variation of this impediment, which may be more prevalent than blatant prejudices, is an indifference or insensitivity of discriminatory practices, which results in the tolerance of these practices and often an ignorance of how certain actions, omissions and decisions, however unintentional, may have the effect of being discriminatory.

An example is the failure of many building inspectors, architects and developers to keep themselves apprised of laws such as the Fair Housing Amendment Act of 1988 (The Act). The 1988 Amendments establish certain design and construction requirements for multi-family housing built for first occupancy after March 13, 1991. The Act sets forth seven minimum design and construction requirements that make units accessible for persons with disabilities.

The Fair Housing Center located in Omaha, Nebraska recently performed a study of newly-constructed, multi-family units throughout Nebraska to determine compliance with The Act. Eighty-six percent of the properties studied had construction or design qualities that violated the law.

Discrimination is evidenced in both the sale and the rental of housing units. It runs the gamut from non-acceptance of Section 8 certificate and voucher holders, to “steering” or influencing a person’s choice of housing location (into or away from certain neighborhoods) by selecting listings or failing to advise of listings on a discriminatory basis, to disapproval of loan applications for housing purchases.

Documentation of such incidences is more readily available in entitlement cities. Both cities in Nebraska have offices specifically for handling such complaints. Many local officials and housing administrators in non-entitlement communities hear complaints frequently; however, fewer complaints are formally filed. While Scotts Bluff, Sarpy, Hall, Box Butte, Madison, Adams, Dawson and Buffalo counties were among the top ten counties filing complaints with NEOC, their total complaints (198) equaled less than one-fifth of the total complaints received in 1993/94.

Interviews with community development staff, housing administrators and concerned citizens revealed much about local attitudes, which go largely undocumented unless formal charges are filed. Many people don't want to admit their biases, or that they are prejudiced against individuals or ethnic groups, or that they do hold stereotypical attitudes toward people. But it does exist.

Many incidences of prejudiceness or insensitivity may stem from a lack of cultural understanding about ethnic populations. By the same token, ethnic populations may not understand the culture into which they have moved. Lack of education on both sides may well be a facet of this impediment.

3. *Local planning, zoning, ordinances, regulations and codes, as well as customs and practices.*

As the State has vested primary authority and responsibility for housing in local governments, it seems appropriate to suspect that housing problems also begin here. The recent report, Cost Reduction Opportunities in Housing issued by the Nebraska Affordable Housing Commission, examined the various steps in production of housing, almost all of which are governed by local laws and regulations.

The focus of this report was to look at areas which increased the cost and time involved in housing production; these are also issues of housing affordability in the private sector as well as the public sector. They are also deterrents to being able to move expeditiously in meeting the demand for new housing. For example, there is a lack of building code uniformity between communities, which cost a contractor time and money. The study also cited problems with local planning and zoning processes, particularly with inexperienced staff who were not familiar with affordable housing concepts such as zero lot line homes/no side yards, clustered development and planned unit developments. Any item that increases the cost of housing production reduce the affordability of the units produced.

A review of local ordinances and decisions of town councils and county courts may reveal some subtle institutional biases that exist. One example of this would be the community that passed an ordinance that no low-income housing could be built within the city limits. Another passed an ordinance that multi-unit housing complexes must be built on paved streets; this was a subtle way of forcing such projects out of the city limits by withholding financial support for paving. If there are no available paved roads within

the city, and no funds available for paving, the housing complex will be forced to locate outside of the city limits.

While isolated incidences can be cited, the extent of the impediments to fair housing choice can only be determined by an in-depth review of local laws and ordinances.

## **CURRENT DEPARTMENT OF ECONOMIC DEVELOPMENT ACTIONS UNDERTAKEN TO AFFIRMATIVELY FURTHER FAIR HOUSING**

The Nebraska Department of Economic Development, Division of Community and Rural Development is the lead state agency in the housing delivery system. Through its administration of the CDBG and HOME programs and its linkages with other agencies – both public and private, the division:

- Provides information, education and technical assistance;
- Facilitates communication and promotes partnerships among the many entities related to housing issues;
- Packages and leverages resources and services to produce comprehensive, cost effective and innovative housing solutions;
- Provides financial resources to service providers
- Develops and operates housing programs to address the needs of low-income persons and special needs populations;
- Contributes housing-related funds and technical assistance to non-profit organizations and local governments throughout the state; and
- Exercises leadership to address key issues that strengthen statewide housing programs.

In affirmatively furthering fair housing, the Department has already made great strides:

- The Department is the coordinating agency for the Nebraska Affordable Housing Commission, and advisory group to Governor Nelson;
- The Department administers the Homeless Shelter Assistance Trust fund and the Emergency Shelter Grant (ESG);
- The Department coordinates portions of its Housing Set-Aside funds with the Nebraska Investment Finance Authority, which enables the State and its citizens to benefit from various programs funded with tax-exempt revenue bonds;
- Not only does the Department set aside in excess of 20 percent of its annual CDBG allocation to support housing projects, it also makes fair housing planning an eligible activity for the use of a planning grant;
- The Department requires grantees under the HOME Program to adopt affirmative marketing procedures and take other steps to affirmatively further fair housing; and

- CDBG grantees are provided with a list of suggested actions to affirmatively further fair housing, and the Department monitors grantees' activity to ensure that actions are taken, regardless of the activity funded by each grant.

Following the completion of the analysis of impediments to fair housing choice, the Department committed to intensify its efforts to ameliorate the barriers identified in a structured fashion through a four year plan. The plan includes an annual work program for each of the four years, with goals and measurable objectives, a listing of resources that may be used, and identification of potential persons or organizations to be involved in completion of each task. Actions proposed will apply to all programs administered by the Department of Economic Development.

## Section II

### **NEBRASKA FAIR HOUSING STRATEGY 1997-2000**

“It is the policy of the State of Nebraska that there shall be no discrimination in the acquisition, ownership, possession or enjoyment of housing throughout the State of Nebraska in accordance with Article I, Section 25, of the Constitution of Nebraska.” This policy is cited at the beginning of the Nebraska Fair Housing Act, effective September 6, 1991.

The U.S. Department of Housing and Urban Development (HUD) defines “fair housing choice” as the ability of persons, regardless of race, color, religion, sex, disability, familial status or national origin, of similar income levels to have available to them the same housing choices.

In the 1995-96 analysis of issues relating to fair housing choice in Nebraska, it was determined that the following are impediments yet to be overcome:

1. *Scarcity of Affordable Housing;*
2. *Discrimination based on ethnicity, gender and familial status, disability; and*
3. *Local planning, zoning, ordinances, regulations and codes, as well as customs and practices.*

The Nebraska Department of Economic Development (the Department), through administration of its programs – particularly the Community Development Block Grant (CDBG) and HOME programs – intends to take additional steps to enhance its current efforts to affirmatively further fair housing choice. The Department accepts as its goal implementation of the State’s policy on fair housing as a part of a collaborative effort and begins a four-year strategy to remedy remaining impediments to attainment of that goal.

This four-year work plan delineates year by year objectives and activities for the Department and its grantees, with each successive year building on the accomplishments of the previous year(s).

This plan seeks to strengthen the already existing relationship between the Department and the Nebraska Affordable Housing Commission (NAHC). Created in 1992 under Executive Order 92-07, the NAHC “is committed to the development of housing policies and initiatives that foster the creation and preservation of affordable housing for *all* Nebraskans.” In its 1996 Report and Recommendations, the Commission addresses obstacles to fair housing choice as one of its priorities.

The Department will undertake specific new and additional activities each year. These will generally fall under the categories of:

1. Capacity-building for grantees, citizens and local governments including training, technical assistance, public awareness and education.
2. Collaboration, which focuses on building relationships between state regional and local fair housing organizations.
3. The Nebraska Affordable Housing Commission.
4. Department Staff.

All grantees, regardless of the type of activity for which they were funded, will be encouraged to complete various segments of an overall work plan. A complete grantee program of work for affirmatively furthering fair housing at the community level can be found in the Appendix.

## **YEAR I:**

1. Capacity Building: The State will expand its annual training efforts to include the following:
  - A. Emphasize fair housing requirements and activities at application and implementation workshops.
  - B. Hold training sessions in-house for staff to ensure that they are 1) familiar with all fair housing requirements, and 2) monitoring fair housing items.
2. Collaboration: The designated fair housing staff person should establish close working relationships with such groups as the HUD State Field Office Fair Housing representative, the Nebraska Equal Opportunity Commission, Fair Housing Center, Legal Services offices, the Nebraska Community Reinvestment Coalition, Nebraska Association of CHDOs, Nebraska Assistive Technology Project, Nebraska Planning and Zoning Association and other advocacy groups who represent protected classes of people, to share issues and complaints, and work toward problem solving with a committee of the NAHC dealing with fair housing issues.
3. Nebraska Affordable Housing Commission Committee: The mandate of the Nebraska Affordable Housing Commission includes *advice* and *support* of The Department’s efforts to affirmatively further fair housing choice. A

subcommittee of the NAHC will be formed that has as part of its mission to address issues of fair housing choice.

The membership of this subcommittee may include representatives of ethnic populations, local governments, fair housing organizations, advocacy groups, housing providers, financial institutions, educational institutions, other state agencies, and members of the general public.

## **YEAR II:**

1. Capacity Building: The State will expand its annual training efforts to include the following:
  - A. Emphasize Fair Housing requirements and activities at application and implementation workshops.
  - B. The Department will work with organizations who have in-depth knowledge and experience with fair housing issues and complaints to address developing materials to conduct workshops for grantees on fair housing issues.
2. Collaboration: The Department will continue to work with appropriate organizations with an interest in housing related activities to develop strategies to reduce the impediments to fair housing choice.
3. Nebraska Affordable Housing Commission: A subcommittee will inform the full Commission on fair housing activities and progress, providing feedback to the Department on suggestions for the fine-tuning activities. The subcommittee may participate in the plans for a Fair Housing Awareness Day with specific events during the NAHC's annual conference, including some recognition of communities that have completed their analyses of impediments and fair housing work plans.
4. Department Staff: With the intensified focus on fair housing choice and the intensive training held the previous year, the entire program staff will become more familiar with the issues and assume some of the burden of response to grantees on fair housing issues. It will be the responsibility of the designated staff person to continue to serve as liaison with the NAHC subcommittee.

## **YEAR III:**

1. Capacity-building:
  - A. Continue to emphasize Fair Housing requirements and activities in application and implementation workshops.

2. Collaboration: Evaluate previous year's efforts to partner with organizations to reduce the impediments to fair housing choice. Develop plans for further collaboration and identify lead agencies to foster communication.
3. Nebraska Affordable Housing Commission: A subcommittee will continue to keep the Commission apprised of Fair Housing activities being conducted by the Department.
4. Department Staff: The designated Fair Housing staff person will continue to work with the NAHC subcommittee.

The State will continue fair housing activities initiated in previous years.

#### **YEAR IV:**

1. Capacity-building: The State will continue with its annual training emphasizing Fair Housing activities in both application and implementation workshops.
  - A. Develop several public service spot announcements concerning fair housing choice. *(This activity may be moved to an earlier year if budget permits.)*
2. Collaboration: In conjunction with working partners from previous years, convene a Fair Housing Conference, with emphasis on Nebraska Examples of Excellence in Fair Housing.
3. Affordable Housing Commission/Subcommittee: The work of the subcommittee will advise on the efforts of the State in improving opportunities for Fair Housing Choice. Based on the results of the evaluation, the subcommittee will propose an additional four year program of work in the area of Fair Housing
4. Department Staff: The designated Fair Housing staff person will lead other CDBG/HOME personnel in an evaluation of the past years' Fair Housing efforts. The Department will examine fair housing activities undertaken by grantees to ascertain if a revision of State law might be recommended to enhance fair housing choice at the local level.

#### Section III

### **Methodology**

In approaching an analysis of impediments, it was appropriate to consider possible or probable impediments that may exist within existing State laws, regulations and administrative procedures affecting the location, availability and accessibility of housing,

as well as public and private conditions that affect fair housing choice, particularly for persons with low and moderate income.

Methodology for research prior to analyzing impediments included interviews, both in person and by telephone, with individuals representing public housing authorities, local governments, housing advocacy groups, minority services groups, concerned citizens, and other individuals active in housing issues in the State, as well as a thorough review of newspaper articles, publicly and privately conducted studies on housing issues in Nebraska and nationwide, and materials related to housing concerns gathered from across the State. A listing of individuals interviewed and literature reviewed appears in the Appendix.

Based on research of the literature, laws and regulations, interviews with individuals and organizations involved with or concerned about housing issues, a list of revealed impediments to fair housing choice was drawn up and analyzed. This analysis consists of a discussion of fair housing impediments and issues and how they may impact an “average” Nebraska community, the State as a whole, and areas of “high minority concentration.” The analysis also encompasses more detailed information that can be provided to policy makers, administrative staff and fair housing advocates.

Impediments are then ranked on the basis of their effect on fair housing choice, regardless of difficulties or barriers to eradicating those impediments. A four-year action plan was developed to address the identified impediments with strategies for overcoming them. The strategies are reality-based in that several lesser ranked impediments may have to be overcome before a higher ranking one can be successfully tackled. The overall plan contains goals and measurable objectives, a time-frame for completion, recommendations of identified resources that may be used, and a focus list of potential persons or organizations to be involved in the amelioration of impediments.

# **APPENDIX**

**Nebraska CDBG/HOME Grantee  
Recommended  
Fair Housing Work Program**

Section I.

1. Perform an analysis of impediments to fair housing choice in your community. Examine your community's history: were instances of alleged discrimination carried in local newspapers? Examine the potential for discrimination in local policies and practices of your local government. Examine local attitudes toward ethnic populations, elderly populations, familial status, etc., living in your community. Review availability of housing in your community, particularly rental units versus the demand for same. Note any instances of complaints of discrimination in connection with previous federally funded projects. List in rank order the impediments to fair housing choice that were examined in your analysis.

Section II.

1. Review the make-up/representation of the local Housing Committee to ascertain if additional members should be added, such as persons representing organizations serving minority populations, persons with disabilities etc. within the community, or of neighborhood associations. Publish/advertise/provide public notice of all meetings of the committee.
2. Use the Equal Housing Opportunity logo on official letterhead and prominently display posters, logo and informational material on fair housing. Annually print a notice in the local newspaper that as a grantee, your local community is an active supporter of fair housing laws.
3. Begin a review of all local ordinances, zoning regulations, land use and administrative policies and practices, looking for those which may be supportive of fair housing choice and those that could possibly have a discriminatory effect. Prepare a brief summary of your review and submit it to the Department. Track new ordinances, policies and practices as they come into being.

**TABLE 1**  
Percentage  
change.

**'POPULATION ESTIMATES THROUGH 1994**

	4/1 90	4/1/90 Correction	4/1 90	7/1 90	7/1 91	7/1 92	7/1 93	7/1 94	Numeric change, 4/1/90 to 07/01/94	Percentage change, 4/1/90 to 07/01/94
Nebraska	1578385	32	1578417	1580653	1591740	1603940	1613326	1622858	44473	0.0281763
Adams County	29625	0	29625	29581	29552	29591	29680	29662	37	0.0012489
Antelope County	7965	0	7965	7932	7891	7791	7682	7617	-348	-0.0436911
Arthur County	462	0	462	467	443	458	463	444	-18	-0.038961
Banner County	852	0	852	862	825	839	845	860	8	0.0093697
Blaine County	675	0	675	662	680	661	655	668	-7	-0.0103704
Boone County	6667	0	6667	6666	6670	6585	6563	6511	-156	-0.0233988
Box Butte County	13130	0	13130	13128	13078	12989	12943	12891	-239	-0.0182028
Boyd County	2835	0	2835	2831	2778	2750	2740	2722	-113	-0.0398589
Brown County	3657	0	3657	3655	3672	3668	3647	3626	-31	-0.0084769
Buffalo County	37447	0	37447	37559	38009	38427	39027	39388	1941	0.0518333
Burt County	7868	0	7868	7879	7836	7852	7861	7893	25	0.0031774
Butler County	8601	0	8601	8573	8596	8658	8561	8567	-34	-0.0039953
Cass County	21318	0	21318	21373	21626	22083	22108	22464	1146	0.0537574
Cedar County	10131	0	10131	10125	10102	10100	10088	10052	-79	-0.0077978
Chase County	4381	0	4381	4408	4399	4294	4269	4228	-153	-0.0349235
Cherry County	6307	0	6307	6285	6298	6376	6308	6367	60	0.0095132
Cheyenne County	9494	0	9494	9479	9400	9529	9557	9574	80	0.0084264
Clay County	7123	0	7123	7113	7076	7188	7173	7236	113	0.0158641
Colfax County	9139	0	9139	9163	9226	9420	9544	9841	702	0.0768137
Cuming County	10117	0	10117	10102	10025	10000	10053	10089	-28	-0.0027676
Custer County	12270	0	12270	12274	12292	12375	12404	12404	134	0.0109209
Dakota County	16742	0	16742	16810	16975	17210	17649	17826	1084	0.0647473
Dawes County	9021	0	9021	8963	8906	8850	9109	9112	91	0.0100876
Dawson County	19940	0	19940	20010	20592	21739	22082	22075	2135	0.1070712
Deuel County	2237	0	2237	2242	2229	2192	2183	2101	-136	-0.0607957
Dixon County	6143	0	6143	6146	6199	6214	6205	6241	98	0.0159531
Dodge County	34500	0	34500	34478	34498	34616	34548	34567	67	0.001942
Douglas County	416444	0	416444	417608	421959	425852	428302	430304	13660	0.0332818
Dundy County	2582	0	2582	2578	2539	2463	2469	2519	-63	-0.0243997
Fillmore County	7103	0	7103	7091	7100	7039	6954	6983	-220	-0.0309728
Franklin County	3938	0	3938	3932	3907	3926	3857	3777	-161	-0.0408837
Frontier County	3101	0	3101	3096	3099	3118	3111	3143	42	0.013544
Furnas County	5553	0	5553	5526	5616	5674	5679	5667	114	0.0205294
Gage County	22794	0	22794	22804	22724	22757	22824	22834	40	0.0017548
Garden County	2460	0	2460	2445	2357	2332	2277	2304	-156	-0.0634146
Garfield County	2141	0	2141	2151	2182	2128	2092	2068	-73	-0.0340962

Gosper County	1928	0	1928	1931	1962	2022	2060	2061	133	0.0689834
Grant County	769	0	769	759	763	776	785	780	11	0.0143043
Greeley County	3006	0	3006	3002	3007	2973	3027	3020	14	0.0046574
Hall County	48925	0	48925	49073	49407	49688	50305	50694	1769	0.0361574
Hamilton County	8862	0	8862	8854	8943	8982	9085	9147	285	0.0321598
Harlan County	3810	0	3810	3802	3760	3736	3775	3751	-59	-0.0154856
Hayes County	1222	0	1222	1221	1196	1186	1171	1155	-67	-0.0548282
Hitchcock County	3750	0	3750	3750	3705	3587	3552	3451	-299	-0.0797333
Holt County	12569	0	12569	12580	12552	12450	12475	12435	-164	-0.0130169
Hooker County	793	0	793	797	780	746	731	727	-66	-0.0832282
Howard County	6055	2	6057	6043	6117	6226	6246	6266	211	0.0348472
Jefferson County	8759	0	8759	8744	8681	8614	8646	8581	-178	-0.020322
Johnson County	4673	0	4673	4667	4668	4648	4650	4630	-43	-0.0092018
Kearney County	6629	0	6629	6618	6530	6566	6559	6582	-67	-0.0101071
Keith County	8584	0	8584	8572	8422	8370	8382	8479	-105	-0.0122321
Keya Paha County	1029	0	1029	1023	1012	965	970	960	-39	-0.0379009
Kimball County	4108	0	4108	4069	4080	4049	4169	4063	-45	-0.0109542
Knox County	9534	30	9564	9537	9396	9453	9430	9512	-22	-0.0023075
Lancaster County	213641	0	213641	214426	216781	220060	223604	225743	12102	0.0566464
Lincoln County	32508	0	32508	32492	32795	33095	33050	33306	786	0.0245478
Logan County	878	0	878	875	870	864	869	886	10	0.0113885
Loup County	683	0	683	679	682	696	688	660	-23	-0.033675
McPherson County	546	0	546	551	549	530	542	554	8	0.014652
Madison County	32855	0	32855	32675	32785	33131	33491	33891	1236	0.0378503
Merrick County	8042	7	8049	8034	8034	8140	8144	8124	82	0.0101965
Morrill County	5423	0	5423	5425	5326	5313	5382	5344	-79	-0.0145676
Nance County	4275	0	4275	4258	4269	4252	4231	4275	0	0
Nemaha County	7980	0	7980	7968	8032	7941	7786	7763	-217	-0.027193
Nuckolls County	5786	0	5786	5764	5721	5635	5598	5570	-216	-0.0373315
Otoe County	14252	0	14252	14206	14275	14407	14431	14380	128	0.0089812
Pawnee County	3317	0	3317	3303	3335	3238	3306	3301	-16	-0.0048236
Perkins County	3367	0	3367	3362	3252	3219	3230	3246	-121	-0.035937
Phelps County	9715	0	9715	9702	9816	9803	9860	9869	154	0.0158518
Pierce County	7827	0	7827	7814	7849	7804	7833	7831	4	0.0005111
Platte County	29820	0	29820	29837	29636	30090	30438	30669	849	0.0284708
Polk County	5675	.7	5668	5658	5547	5530	5479	5556	-119	-0.0209692
Red Willow County	11705	0	11705	11668	11519	11411	11436	11372	-333	-0.0284494
Richardson County	9937	0	9937	9956	9893	9853	9768	9750	-187	-0.0188186
Rock County	2019	0	2019	2008	2008	1979	1954	1931	-88	-0.0435859
Saline County	12715	0	12715	12690	12610	12708	12825	12898	183	0.0143924
Sarpy County	102583	0	102583	103054	105760	107101	106604	105201	6618	0.0645136
Saunders County	18285	0	18285	18337	18320	18513	18642	18706	421	0.0230243

Scotts Bluff Count	36025	0	36025	35988	36249	36611	36738	36946	921	0.0255656
Seward County	15450	0	15450	15490	15569	15710	15814	16049	599	0.0387702
Sheridan County	6750	0	6750	6697	6608	6606	6605	6669	-81	-0.012
Sherman County	3718	0	3718	3704	3685	3683	3635	3611	-107	-0.0287769
Sioux County	1549	0	1549	1537	1526	1536	1554	1566	17	0.0109748
Stanton County	6244	0	6244	6273	6257	6185	6133	6148	-66	-0.0153748
Thayer County	6635	0	6635	6610	6619	6595	6567	6537	-98	-0.0147702
Thomas County	851	0	851	853	829	815	806	825	-26	-0.0305523
Thurston County	6936	0	6936	6933	6987	6968	7104	7200	264	0.0380623
Valley County	5169	0	5169	5166	5053	5010	4911	4900	-269	-0.052041
Washington Coun	16607	0	16607	16640	16737	16971	17296	17445	838	0.0504606
Wayne County	9364	0	9364	9354	9513	9462	9545	9564	200	0.0213584
Webster County	4279	0	4279	4270	4222	4214	4183	4190	-89	-0.0207993
Wheeler County	948	0	948	948	936	933	942	975	27	0.028481
York County	14428	0	14428	14411	14409	14545	14572	14576	148	0.0102578

Source: Population Estimates Branch, U.S. Bureau of the Census  
Calculations by: Nebraska State Data Center, Center for Public Affairs Research

Center for Public Affairs Research  
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Omaha, Nebraska 68182  
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10/5/95

Nebraska State Data Center

Center for Public Affairs Research

University of Nebraska at Omaha

TABLE 2

PERCENTAGE MINORITY POPULATION IN NON-ENTITLEMENT AREAS  
HIGHER THAN THE STATE AVERAGE

COUNTY NAME	WHITE	BLACK	NATIVE AM ESKIMO	ASIAN PACIFIC IS	OTHER	Total Minorities	Minority % of Total City
Adams	29084	181	105	113	142	541	1.8
Antelope	7930	2	20	9	4	35	0.43
Arthur	459	0	3	0	1	3	0.64
Banner	832	1	3	0	16	20	2.3
Blaine	671	1	1	0	2	4	0.59
Boone	6648	2	11	1	5	19	0.28
Box Butte	12501	49	302	57	221	629	4.7
Boyd	2810	0	22	1	2	25	0.88
Brown	3636	1	11	7	2	21	0.57
Buffalo	36430	166	118	162	571	1017	2.7
Butt	7746	8	70	14	27	119	1.5
Butler	8560	10	17	13	1	41	0.47
Cass	21033	42	108	71	63	285	1.3
Cedar	10099	6	14	9	3	32	0.31
Chase	4345	1	6	2	23	32	0.73
Cherry	6107	3	177	14	6	200	3.1
Cheyenne	9250	8	73	15	148	244	2.5
Clay	7067	1	17	13	25	56	0.78
Colfax	9002	3	32	9	93	137	1.4
Cuming	10076	8	10	20	3	41	0.4
Custer	12152	3	66	12	35	118	0.96
Dakota	15481	76	302	358	525	1261	7.5
Dawes	8492	55	355	75	44	529	5.8
Dawson	19629	15	65	41	290	411	2.1
Deuel	2185	1	10	7	34	52	2.3
Dixon	6124	4	11	3	1	19	0.3
Dodge	34132	73	111	119	65	368	0.11
Douglas	77835	1552	207	674	381	2814	3.4
Dundy	2568	0	5	4	5	14	0.54
Fillmore	7942	14	33	4	10	61	0.85
Franklin	3915	6	10	6	1	23	0.58
Frontier	3074	1	4	8	14	27	0.87
Furnas	5515	4	18	6	10	38	0.68
Gage	22530	45	102	77	40	264	1.2
Garden	2455	0	0	1	4	5	0.2
Garfield	2133	0	3	5	0	8	0.37
Gosper	1927	0	0	1	0	1	0.06
Grant	760	0	5	3	1	9	1.2
Greeley	2999	0	4	3	0	7	0.23
Hall	47263	145	150	540	827	1662	3.4
Hamilton	8611	9	9	24	9	51	0.57
Hartman	3804	2	2	1	1	6	0.15
Hayes	1218	0	2	2	0	4	0.33
Hitchcock	3733	0	8	3	6	17	0.45
Holt	12537	3	30	17	12	62	0.49
Hooker	792	0	0	0	1	1	0.12
Howard	6020	1	13	3	19	35	0.57
Jefferson	8710	4	23	8	14	49	0.55
Johnson	4541	1	0	107	24	132	2.8
Kearney	8579	0	3	4	43	50	0.75
Keith	8403	10	49	15	107	181	2.1

TABLE 2

Keya Paha	1028	0	1	0	0	1	0.1
Kimball	4074	2	9	6	17	34	0.82
Knox	9031	0	482	17	4	503	5.3
Lancaster	21343	144	57	79	46	326	1.3
Lincoln	31354	95	120	115	824	1154	3.5
Logan	873	3	0	0	2	5	0.97
Loup	682	0	0	1	0	1	0.14
McPherson	545	1	0	0	0	1	0.18
Madison	31734	236	236	99	346	921	2.8
Memick	7996	3	13	21	9	46	0.57
Monk	5202	1	33	7	180	221	4.1
Nance	4250	1	5	8	11	25	0.58
Nemaha	7876	72	13	14	5	104	1.3
Nuckolls	5774	1	8	0	3	12	0.2
Osceola	14138	25	31	25	33	114	0.75
Pawnee	3304	3	1	4	5	13	0.38
Perkine	3320	0	8	8	31	47	1.3
Pierce	9653	5	15	16	26	62	0.63
Pierce	7782	0	25	9	11	45	0.57
Platte	29523	54	61	74	106	297	1
Polk	5632	1	13	11	18	43	0.75
Red Willow	11568	13	28	25	71	137	1.2
Richardson	9738	5	178	11	7	199	2
Rock	2017	0	1	0	1	2	0.09
Saline	12537	16	24	111	27	178	1.4
Sarpy	93712	5336	399	1970	1166	8871	8.6
Saunders	18157	15	46	29	38	128	0.7
Scotts Bluff	32822	70	662	180	2291	3203	8.9
Seward	15334	20	31	36	29	116	0.75
Sheldon	8200	3	524	16	7	560	8.1
Sherman	3700	0	3	10	5	18	0.48
Sioux	1510	0	1	2	36	39	2.5
Stanton	8167	23	37	5	12	77	1.2
Thayer	6595	4	18	7	11	40	0.6
Thomas	847	0	4	0	0	4	0.47
Thurston	3881	8	3046	7	14	3075	44.3
Valley	5127	6	11	10	15	42	0.81
Washington	16403	85	39	34	46	204	1.2
Wayne	9257	40	28	34	5	107	1.1
Webster	4256	1	6	13	3	23	0.53
Wheeler	945	0	0	3	0	3	0.31
York	14216	89	48	44	31	212	1.4

SOURCE: U.S. 1990 Census, Summary Tape File 1A.





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*NE CDBG 1995 Application Guidelines*

*NE CDBG 1995 Housing Application Guidelines*

*NE CDBG Administrative Manual – Chapter 1 & 5 Fair Housing excerpts; Chapter V – Sample Contract. Civil Rights provisions and Fair Housing Standards and Provisions; Chapter 10 Civil Rights; Chapter 13 Home Ownership Opportunities Program Fair housing and complaint procedures, and Chapter 14 Final Performance Report – Fair housing certification form.*

*NE CDBG Monitoring Checklist*

*NE HOME Manual – Fair Housing excerpts*

*NE 1995 Housing and Community Development Consolidated Plan*

*Real Estate Advertising Policy, consistent with FHAA of 1988*

*Settlement Agreement in the Civil No. 90-0-55, Plaintiffs Hawkins, Davis, Harris and Bynum (former residents of Logan Fontenelle homes) on behalf of themselves and others similarly situated Vs. Defendants Henry Cisneros, the U.S. Department of Housing and urban Development, the Omaha Housing Authority and the City of Omaha*

*Sioux City's 1995 Consolidated Plan & Strategy Siouxland Consortium (which includes South Sioux City, Dakota City and Dakota County, Nebraska)*

*Wood River Nebraska Housing Market Study, Hanna: Keelan Associates, July 1993*