



Pinellas County, Florida 2016 Analysis of Impediments to Fair Housing Choice



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Pinellas County, Florida

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INTRODUCTION AND ACKNOWLEDGMENTS

Introduction

The U. S. Department of Housing and Urban Development (HUD) requires that entitlement communities – communities receiving direct federal funding from Community Development Block Grant, HOME Investment Partnership and Emergency Shelter Grant programs – in compliance with federal regulation 24 CFR 91.225(a)(1); 91.325(a)(1); and 91.425(a)(1)(I), will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the community, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

A broader interpretation by HUD of these objectives means to: analyze and eliminate housing discrimination in the community, promote fair housing choice for all persons, provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin, promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities and foster compliance with the nondiscrimination provisions of the Fair Housing Act.

Additionally, the Consolidated Plans (Con Plan) for Housing and Community Development for Pinellas County, Florida, the City of Clearwater, Florida, the City of Largo, Florida and the City of St. Petersburg, Florida, contain a certification to affirmatively further fair housing requiring the jurisdictions to conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard. The Analysis of Impediments (AI) presented herein is in conjunction with the Pinellas County, Florida fiscal years 2015-2019 Consolidated Plan (ending September 30, 2020), including the City of Largo, The City of Clearwater, Florida 2016-2020 Consolidated Plan (ending September 30, 2020), and The City of St. Petersburg, Florida 2016-2021 Consolidated Plan. The research and preparation of the Analysis of Impediments to Fair Housing Choice was funded with federal and local government funds.

The purpose of the AI is to examine how state and local laws, private, public and non-profit sector regulations, administrative policies, procedures, and practices are impacting the location, availability, and accessibility of housing in a community. The AI is not a Fair Housing Plan rather it is an analysis of the current state of fair housing choice throughout Pinellas County and identifies specific barriers that need to be addressed if future fair housing initiatives are to be successful.

Lead and Participating Agencies – Acknowledgements

The Pinellas County Office of Human Rights (PCOHR) was responsible for oversight and coordination of the Analysis of Impediments (AI) process. The document was finalized and edited by Diana Sweeney of the Community Development and Planning Division of the Pinellas County Planning Department. As previously indicated, participating partners in the preparation of the AI include Pinellas County, the City of Clearwater, the City of Largo, and the City of St. Petersburg. Data collected in preparing the AI relied in part on input from the public. The process included information gathered from two publicly noticed and advertised focus group meetings with residents, key persons interviews, a publicly available on-line survey, and data provided by the Pinellas County Office of Human Rights, the Community Development and Planning Division of the Pinellas County Planning Department, and partner cities of St. Petersburg, Largo, and Clearwater, Florida. We especially thank residents who attended focus group meetings and on-line survey participants for their valuable contributions.

We also must acknowledge our liaisons to each of the partner cities, Diane Durr and former city employee, Michael Holmes, (City of Clearwater), Matt Anderson (City of Largo), and Joshua Johnson, Lynn Gilbert, and others (City of St. Petersburg), as well as Pinellas County employees Renea Vincent, Cheryl Collier Reed, and Diana Sweeney among many others. We would also be remiss not to acknowledge the assistance provided by the Pinellas County Board of County Commissioners, County Administrator Mark Woodard, OMB Director William Berger, and Workforce Development Manager, Jack Loring for their assistance and organizational support. We also acknowledge the participation of staff members of the Pinellas Housing Authority, Clearwater Housing Authority, St. Petersburg Housing Authority, Tarpon Springs Housing Authority, and Dunedin Housing Authority and various members from the housing development, non-profit, social services, business and real estate industries.

Finally, completion of this AI would not have been possible without the work of staff from the Pinellas County Office of Human Rights (particularly Mercedes Pearson and Mark Esparza), and the incredible assistance provided by Vira Suarez and James McDevitt - interns from graduate programs at the University of South Florida. Ms. Suarez and Mr. McDevitt provided input and analysis of the highest value to this process, and we could not have completed the AI without their efforts. We, and the residents of Pinellas County, owe them our thanks for their work on this most important of topics.

Paul Valenti
Director, Office of Human Rights

EXECUTIVE SUMMARY

Evaluating fair housing impediments is a complex process involving diverse and wide-ranging considerations. The role of economics, housing patterns, and personal choice are important to consider when examining fair housing choice. Pinellas County has relatively few impediments to fair housing. However, some issues were identified.

The analysis of fair housing choice in the Pinellas County has resulted in the identification of impediments, identified through a study methodology that included conducting focus group meetings with residents, the construction of a demographic analysis resulting in a community profile and fair housing index, analysis of the Home Mortgage Disclosure Act (HMDA) data for Pinellas County and a fair housing law and public policy and program review.

Community Profiles

According to the 2014 Census population estimates, the population of Pinellas County was 938,098. Between 2010 (pop. 916,812) and 2014, the total population of the County increased by 2.3 percent. According to estimates provided by the Pinellas County Economic Development Data Center, the total population of the County will further increase to 942,459 by 2020.

According to the 2009-2013 American Community Survey the percentage of Whites in the County was 83.2 percent, African Americans was 10.3 percent, and the Hispanics was 8.2 percent.

When considering all family types with children present, the data indicates that 54.5 percent of all White households, 59.9 percent of all African American households, and 64.7 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics; the percentage of female-headed households with children among White households was 9.3 percent, compared to 30.1 percent in African American households, and 17.2 percent in Hispanic households.

Non-family households among Whites made up 45.5 percent of all White households in Pinellas County. Non-family households among African Americans accounted for 40.1 percent of all African American households. Non-family households among Hispanics accounted for 35.3 percent of all Hispanic households.

Overall, the income distribution data shows a higher proportion of low-income households within the African American and Hispanic communities. In general, limitations on fair housing choice are more commonly found to affect housing decisions among low-income persons.

According to the 2009-2013 American Community Survey, the median household income was reported to be \$47,442 for White households, \$30,629 for African American households and \$38,538 for Hispanic households, compared to \$45,535 for the overall County.

Table 1.1 illustrates the incidence of poverty among African Americans was 31.5 percent of the total population, Hispanics was 21.4 percent of the population, and White persons were reported at 11.6 of the populations. In comparison, the poverty rate for all of Pinellas County was 14.1 percent.

Table 1.1: Poverty Status by Race Pinellas County, 2009-2013

Age Group:	White		African American		Hispanic	
	Number	Percent	Number	Percent	Number	Percent
Under 5 years	4,716	0.6%	3,954	4.3%	2,227	3.0%
5 years	978	0.1%	1,014	1.1%	283	0.4%
6 to 11 years	5,563	0.7%	3,964	4.3%	1,982	2.7%
12 to 17 years	5,447	0.7%	3,238	3.5%	1,426	1.9%
18 to 64 years	55,785	7.4%	15,052	16.2%	8,977	12.0%
65 to 74 years	6,740	0.9%	1,056	1.1%	553	0.7%
75 years and over	8,040	1.1%	932	1.0%	535	0.7%
Total	87,269	11.6%	29,210	31.5%	15,983	21.4%

Source 2009-2013 American Community Survey

Employment opportunities in the area and educational levels of the employees make a significant impact on housing affordability and the housing choice of residents. Occupation data indicates that there has been some shift in the distribution of occupations between 2000 and 2014. Agriculture, forestry, fishing and hunting, and mining had the largest increase at 108.3 percent (833 jobs to 1,735 jobs) with Educational Services, and Health Care and Social Assistance, and Professional, Scientific, and Management, and Administrative and Waste Management Services having the second and third largest increases at 18.4 percent and 11.6 percent respectively. All other categories decreased with the largest reductions in Manufacturing at 31.0 percent, Wholesale Trade at 29.7 percent, and Information at 39.8 percent.

According to the 2015 ESRI data provided by the Pinellas County Economic Development Data Center, the Educational industry had highest percent of employees at 18.9 percent, the Retail sector employed 16.3 percent of the total Employees, Arts and Entertainment employed 11.8

percent, Finance had 9.8 percent, Professional employed 8.3 percent, with Construction, Manufacturing, Wholesale Trade, Public Administration and Other employing between 5.0 percent and 7.0 percent per category.

A closer look at the make-up of the distribution of the unemployed indicates that much of the unemployment is centered in the African American and Hispanic communities. In the 2009-2013 American Community Survey, as illustrated in Table 1.2, 9.3 percent of White persons age 16 and over reported being unemployed. African Americans in the same group reported a 15.6 percent unemployment rate and Hispanics reported a 10.0 percent unemployment rate. According to the Bureau of Labor Statistics, the unemployment rate for Pinellas County was 10.8 percent in both 2009 and 2010, 9.7 percent in 2011, 8.0 percent in 2012, and 6.7 percent in 2013.

Table 1.2: Employment Status by Race for Pinellas County

	White		African American		Hispanic		Total	
Employment Status:	Number	Percent	Number	Percent	Number	Percent	Number	Percent
In Labor Force:	385,766		45,164		38,550		460,998	
In Armed Forces	1,330	0.3%	143	0.3%	115	0.3%	781	0.2%
Civilian:	384,436		45,021		38,377		460,217	
Employed	348,520	90.7%	37,995	84.4%	34,528	90.0%	413,336	89.8%
Unemployed	35,916	9.3%	7,026	15.6%	3,849	10.0%	46,881	10.2%
Not in Labor Force	279,348	42.0%	26,525	37.0%	18,901	32.9%	320,354	41.0%
Total Population 16 years or older	665,114		71,689		57,451		781,353	

Source 2009-2013 American Community Survey

In Pinellas County, the difference in the unemployment rate between the three largest population groups, to some extent, may be due to educational attainment. According to the 2009-2013 American Community Survey, 80.1 percent of African Americans age 25 and above reported a high school education compared to 90.9 percent of Whites and 79.4 percent of Hispanics in the same age group. As a comparison, the percentage of population with less than a high school education in the County was 10.6 percent. It must be noted that these results represent a significant improvement over the 2000 Census data, which indicate for the same age group that 68.3 percent of African Americans, 85.0 percent of Whites and 73.70 percent of Hispanics reported a high school education.

To further examine the impact of employment proximity relative to housing choice for low- and moderate-income persons, we analyzed the use and availability of public transportation. Pinellas Suncoast Transit Authority (PSTA) provides public transportation services throughout Pinellas County, operating 40 routes including 2 express routes to Tampa. In fiscal year 2012-2013, total annual ridership was just shy of 14.5 million, and the ridership on an average weekday was 45,864. The services provided by the PSTA include bus services, "bikes on buses, services for

seniors, disabled, and low-income individuals as well as beach trolley services. Regional programs include express bus routes that travel from Pinellas County to Pasco County. PSTA operates Suncoast Beach Trolley, Central Avenue Trolley and the East Lake Shuttle, and trolley services are also provided by various other agencies, such as the Pinellas County Jolley Trolley, Gulfport Trolley and the St. Pete Looper Trolley. The PSTA provides demand response transportation services (DART) for people who, because of their disability, are unable to independently use the regular, accessible PSTA buses; demand response services are provided wherever regular PSTA bus service is available. PSTA also provides 50 percent reduced fares for adult students, persons 18 years or younger and senior citizens.

Housing Profile

Fair housing choice can be influenced by the housing market. There were 481,587 housing units in Pinellas County in 2000 and 503,634 units in 2010, which represents a 4.6 percent increase during the ten year period.

In 2010, the median housing value in the County was \$146,500, while the median contract rent was \$754. According to 2014 data provided by the Pinellas County Realtor Organization, the median sale price in the County has increased to \$180,000, and according to 2014 Florida Housing Data Clearinghouse data the average rent was \$947.

Single-family homes are the predominate housing structures in the County (1-unit detached or attached) units with only 16% in units of 20 or more units. Mobile homes comprise the third largest (9.5%) component of housing within the County. Slightly over 70% of the County's housing stock is owner occupied which is high for a densely populated urban County. The average size of housing is fairly similar with the average size of ownership housing of 2.24 and average size of renter occupied housing of 2.14. 63% of the housing stock is comprised of 2 bedrooms or less units. Approximately 10% of the housing units have 4 or more bedrooms.

Comparisons of 2000 and 2010 U.S Census data indicates Pinellas County experienced a net loss of approximately 6,000 residents during the decade and a housing inventory increase of 22,061 units, of which occupied housing gained only 908 units. The decline in population despite a growth in occupied housing units was caused by a slight decrease in persons-per-household. The County's vacant owner owned housing increased by 5,417 units during the decade.

The County's housing stock is fairly old with only 6% of owner housing and 7% of renter housing being built since 2000, while 57% of owner housing and 58% of renter housing is over 35 years old. Three percent (3%) of owner and 4% of renter the housing dates back to 1949 or earlier.

According to the latest data from the U. S. Department of Housing and Urban Development (HUD) American Housing Survey (AHS) the median age of an owner-occupied home in the United States was 35 years old as of the 2011 survey. The housing stock, as a result of age, is becoming functionally obsolete in terms of layout, size, insulation, energy efficiency and electrical connectivity with limited room outlets that may require updating or replacement. Overall, the decision remains if it is economically viable to renovate these units or whether many of these owner-occupied homes will revert to lower priced rental housing, with high maintenance and utility costs that may eventually decline to create more slum and blight within the county.

Evaluation of Jurisdiction's Current Fair Housing Legal Status

The State of Florida and Pinellas County have enacted fair housing laws that are substantially equivalent to the federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended. Both the State (Florida Civil Rights Act (ss. 760.01-760.11) and the Fair Housing Act (ss. 760-20-760.37)), and Pinellas County (Chapter 70, Section 103, of the Pinellas County Code) disallow the same activities prohibited under the federal Act. Pinellas County Code has been amended to include protection to additional classes based on sexual orientation in 2008, and gender identity in 2013, and applies to all territory within the legal boundaries of Pinellas County, Florida, including all unincorporated and incorporated areas.

The Fair Housing Act Title VIII of the Civil Rights Act of 1968, as amended, is a legislative enactment enforcing a policy of equal access to all types of housing for classes of persons within its protection. To this end, the Act prohibits intentional and unintentional acts of discrimination that impact the groups protected by the act. The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status and national origin.

Pinellas County has actively engaged in providing fair housing education, training, outreach, and awareness initiatives. Staff provides monthly training sessions to PRO, the Pinellas Realtor Organization within Pinellas County, thereby exponentially increasing its reach into the community. Realtors, property managers and public assistance housing providers are the first line of defense in preventing or perpetuating discrimination. Pinellas County Human Rights (PCOHR) staff also provides updated training on an annual basis, or as requested, to municipal entities, common-interest communities, (Homeowner and Condominium Associations) and local private businesses.

The PCOHR employs two Equal Opportunity staff members who are responsible for providing fair housing education/outreach, training and awareness initiatives. The PCOHR is responsible for the intake, investigation and resolution of fair housing complaints to fulfill the HUD requirements for

the operation of a "Substantially Equivalent Fair Housing Program". In addition to Pinellas County, this program designation has been earned by only five other counties among Florida's total 67 counties.

Enforcement and Litigation

Between 10/1/2011 and 06/15/2015, Pinellas County processed two hundred nineteen (219) intakes. Between 10/1/2011 and 06/15/2015, Pinellas County processed two hundred thirteen (213) cases to closure.

The statistics show an overwhelming number (150) or 68.0 percent of complaints filed based on disability discrimination. Thirty nine complaints (39) or 17.0 percent were filed based on Race, Seventeen (17) or 7.0 percent were filed based on National Origin, Fourteen (14) or 6.0 percent were based on Familial Status, twenty three (23) or 10.5 percent were based on Gender and seven (7) or 3.0 percent were filed on the basis of Religion. Complaints can have multiple bases, making the total herein higher than the number of total cases.

Regarding the local protection of sexual orientation and gender identity, there were a total of ten (10) complaints filed based on Sexual Orientation, and none on Gender Identity.

There is a need for increased exposure by the respondent housing providers to the Fair Housing Laws protecting persons with disabilities. This is particularly true for rental units controlled by Homeowner Associations and Condominium Boards as well as other communal housing providers relating to acceptance of assistance animals.

Regarding the alleged harms comprising these filings, the denial of a reasonable accommodation was the most commonly cited harm, with one hundred sixteen (116) complaints filed on this basis. The second largest harm was the alleged imposition of different terms and conditions, with one hundred thirteen (113) instances of such allegation. The remainder of the harms, in diminishing order, were as follows: sixty four (64) allegations of harassment, twenty six (26) allegations of a refusal to rent, twenty three (23) allegations of discriminatory advertising, sixteen (16) allegations of a false denial of availability, nine (9) allegations of making housing otherwise unavailable, eight (8) allegations of a refusal to sell, three (3) allegations for steering, three (3) for a denial of a reasonable modification, two (2) allegations of discriminatory financing and one (1) regarding discriminatory zoning.

Regarding harms alleged under the local basis of Sexual Orientation, there were seven (7) allegations of harassment and intimidation, and five (5) allegations regarding the imposition of different terms and conditions.

Resolution of Complaints

In this same time frame (10/1/2011 to 6/15/2015), there were a total of two hundred thirteen (213) cases processed to a conclusion. In this same time frame (10/1/2011 to 6/15/2015), Reasonable Cause was proposed in twenty (20) or 9.0 percent of the cases.

No Reasonable Cause was concluded in one hundred fifteen cases (115) or 53.0 percent, twenty (20) cases were successfully conciliated, fifty eight (58) cases were withdrawn after successful resolutions between the parties, three (3) cases were withdrawn without a settlement, and two (2) were closed as a failure to cooperate.

The overwhelming number of disability complaints taken during this time period indicates a need for exposure to, and training and development of, private sector leaders and front line staff in the proper handling of requests for accommodation; the majority of cases investigated involve service animal requests.

Funding

Pinellas County receives Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Shelter Grant (ESG) entitlement allocations. For Fiscal Years 2010-2014, a total of \$14,282,140 (\$13,228,018 in entitlement dollars and \$1,054,122 in program income) was received in CDBG, \$945,885 in ESG, and \$10,392,685 in HOME (\$6,559,934 in entitlement and \$3,832,751 in program income and recapture). Pinellas County, for the same period also received Neighborhood Stabilization Program 1-3 allocations totaling \$5,622,541, Housing Trust Fund program income of \$559,464, and State of Florida State Housing Initiative Partnership (SHIP) of \$6,944,250 (\$3,730,220 in allocations and \$3,214,030 in program income). Pinellas County has leveraged these funds into an additional \$135,208,491 in private funding; and the household income of the housing units produced was extremely low to low income (0-80% of area median income); 11.0 percent of the housing units produced benefitted households with moderate income (80-120 area median income) and 1.0 percent benefitted households in the middle income (120+ area median income) category.

Community Outreach and Engagement

Two focus group meetings with residents held on October 27, 2015 at the Enoch Davis Center, 1111 18th Ave. South, St. Petersburg, Florida and November 19, 2015 at Pinellas County Offices,

440 Court St., Clearwater, Florida. Participants in the focus group meetings included City and County Staff and Public Housing Authorities' personnel for the various jurisdictions, and other government representatives; representatives from local colleges, universities, and school districts; non-profit organizations, home builders, housing and social service agencies representatives; real estate and financial industry representatives; and the general public and other community representatives. Comment forms were available to the attendees in both English and Spanish versions.

Discussion in the fair housing focus group meetings spanned numerous issues, but the following issues were voiced repeatedly; lack of public awareness of fair housing rights, socio-economic conditions, lack of homebuyer education, predatory lending, credit issues, financial assistance, special needs housing, financial literacy and public transportation.

Community Reinvestment Act and Home Mortgage Disclosure Act

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound banking operations. CRA examinations are conducted by the federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC).

For the period covering this Analysis of Impediment 2007-2013, all financial institutions in Pinellas County governed by the FDIC, FRB and OCC were rated either Outstanding or Satisfactory, with no Needs Improvement or Substantial Non-Complaint. (Source: <http://www2.fdic.gov/crapes/>)

Based on a review of the Home Mortgage Disclosure Act (HMDA) data, overall, origination rates among Whites were higher than minorities in home purchase, home improvement and refinance loans. Refinance loans were the most frequent loan type in the County and the three incorporated cities analyzed in this study. The loan applications and originations were significantly lower compared to their percentage in population for African Americans, Asians, and Hispanics in the County and the cities. This suggests two issues, the lack of applications from minorities and the rate of loan denials. The reasons for lower loan originations among minorities were inconclusive based on the overall data. However, during the period between 2007 and 2013, of the 57,531 loans that were denied, the majority of loan denial reasons for all applicants

were related to the applicants' poor credit history, lack of collateral, or high debt-to-income ratio.

Additionally, while the analysis offered does not provide conclusive evidence of redlining, the data tend to suggest some characteristics of redlining may exist. Ideally, origination rates should be similar among same income groups regardless of the income for the census tract where the subject property is located. However, the origination rates for all the income groups increases as the tract income increases and decreased as the tract income decreased. This indicates that families with similar income are more likely to originate a loan for property in a higher income census tract in Pinellas County and the incorporated cities. While it is expected that very low-income applicants tend to have lower origination rates, within the very low-income census tracts, even high-income applicants showed a poor success rate. However, due to very low number of applications in the lower income census tracts, any conclusive determination of redlining is impossible for the County.

Fair Housing Index

The Fair Housing Index highlights geographic areas indicating a concentration of attributes prevalent in fair housing issues. These attributes include high concentrations of minorities, older and functionally obsolescent housing stock, reliance on public transportation, low income, low housing values and high contract rents, a high percentage of female headed households with children, a high ratio of loans denied to loans originated, and higher unemployment rates in the African American and Hispanic communities. The collective concentration of these issues can lead to neighborhood deterioration and declining market conditions that tend to impede fair housing choice.

There were strong correlations between percentage minority and the percentage unemployment, the percentage of female headed households with children, and percentage using public transportation. This means that minority communities had higher unemployment, higher number of female-headed households with children and greater reliance on public transportation to get to work than communities with lower concentrations of minorities. The percent minority had a moderate negative correlations with median household income, median rent, and median house value. The percentage of female headed households with children had a strong negative correlation with median household income and median housing value, with a moderate negative relationship with median contract rent. This indicates that minorities and single mothers tend to earn lower incomes and live in lower valued housing.

The loan origination variable, the ratio of denials to originations for all loan types, has a strong negative correlation to household income, which means that in areas with lower household incomes, there is a higher rate of denial compared with origination.

As indicated on Map 11 in the Fair Housing Index Section, there are a greater number of higher risk census tracts concentrated in the southeastern census tracts of the Pinellas County, within St. Petersburg. There are some higher risk areas in Tarpon Springs, Clearwater, Lealman, and High Point. These areas of concern are characterized by older, lower housing values and rents, and are primarily occupied by minority households that have higher percentages of households headed by females with children than other areas of the County. There is also a higher than average unemployment rate and lower than average level of educational attainment.

Impediments to Fair Housing and Recommendations

Impediment: Areas of Discrimination

Discrimination as an impediment is evidenced through a few of our data sources and is experienced by a variety of protected class members.

- A. Discrimination with regard to home mortgage loans.
- B. Discrimination of nationally and locally protected classes.
- C. Competency in Fair Housing Policy

Impediment: Areas of Limited Opportunity

One of the other impediments to fair housing identifiable via the analysis is the County's areas of limited opportunity. In essence certain portions of the County have a variety of factors which preclude their residents from being able to fully and freely choose their housing.

- A. Transportation-Burdened Areas
- B. Income Barriers

Impediment: Condition of Housing Stock

The housing stock in Pinellas County is fairly old with almost 60% of both owner housing and renter housing is over 35 years old; as a result of age, this housing becomes functionally obsolete in terms of layout, size, insulation, energy efficiency and electrical connectivity. If renovations or maintenance to older homes is not performed, especially in low income areas due to cost, it is likely that owned homes will turn to rental units and eventually decline to create more slum and blighted communities. Home Improvement loans have the lowest application and origination rate of the three loan purposes examined in this report, yet the condition of the housing stock is considered older than the national median average, and the majority of owner occupied housing is only two bedrooms.

- A. Age of Housing
- B. Access to Home Improvement Loans

Section I: Community Profile

The background data for Pinellas County serves as a tool to provide context for the analysis of impediments to fair housing. As outlined further in this Report, the background data is often a factor in the impediments that have been identified. The housing profile section also reflects the issues associated with fair housing choice in Pinellas County.

All attempts were made to utilize consistent data sources and date timelines. Data from such sources as the Home Mortgage Disclosure Act, Comprehensive Housing Affordability Strategy data, the 2010 Census, and the 2013 American Community Survey were utilized as available, but factors like the 2012 census block realignment have made some data incomparable. The most recent data available was utilized; however, as the dates vary, some sections may reflect different time periods. Although, this affects the comparability between sections of this Report or visualizations, the data still serves as a valuable indicator of impediments to fair housing choice.

Demographic and Socioeconomic Characteristics

The data and analysis of Pinellas County's demographic, economic, and geographic characteristics set the stage for identifying and analyzing the housing impediments identified later in this Report. The consideration of these factors allowed the analysis to focus further on issues facing the County's diverse and rapidly changing population of residents.

Population

Pinellas County had a total population of 916,812 and 920,015 according to the 2010 Census and the 2013 American Community Survey (ACS), respectively; both data sources indicate 52 percent females and 48 percent males. The median age was 46.6 years (2013 ACS). Minors, or those under 18 years of age, represent 17.2 percent of the population while 22.6 percent was 65 years and older. These figures are below and above the national averages, respectively, which reflects the popularity of Pinellas County and Florida as retirement destinations.

Pinellas County is the second smallest County in the State by area; however, it is the most densely populated, with over 3,300 people per square mile. Although the population of Pinellas County has increased since 2010, it is at a much lower rate than that of Florida and the country as a whole (Table 1).

Table 1: Population Change 2010-2013

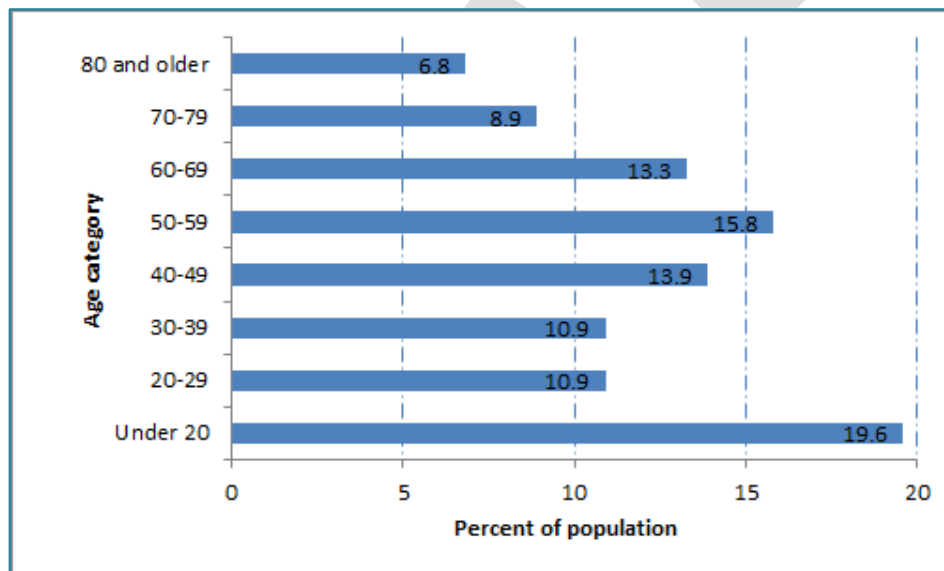
	Pinellas County	Florida	U.S.
Population 2010	916,812	18,804,623	308,758,105
Population 2013	929,048	19,552,860	316,128,839
% change	+1.4	+4.0	+2.4

Source: United States Census Bureau QuickFacts

Age

Pinellas County's age distribution is shown in Chart 1, below. Although those under 20 years of age make up the single largest group, the group also encompasses the largest age distribution. Most notably, almost half (44.8 percent) of the population is 50 years of age or older.

This age distribution implies that as baby boomers age into retirement, the already heavily weighted older population will be in need of additional housing options that appeal to retirees.

Chart 1: Pinellas County Age Distribution

Source: US Census Bureau, 2009-2013 5-Year American Community Survey

Racial and Ethnic Composition

The majority (97.9 percent) of Pinellas County residents identify as one race, which indicates a small increase from the 2000 Census of those identifying with two or more races (1.6 percent up to 2.1 percent). Those individuals who identify as White make up the majority of Pinellas County's population, at 83.2 percent; those identifying as African American make up the second largest racial group at 10.3 percent. The third largest racial group in the County is made up of individuals identifying as "Asian alone" at 3.1 percent.

A significant portion of the Pinellas County (8.2 percent) population identify as Hispanic or Latino origin. Table 2 outlines the overall racial demographics in the County while Table 3 outlines this data with consideration for ethnic differences.

Table 2: Pinellas County Race Composition

	Estimate	% of Total Population
Total:	920,015	100%
Population of One Race:	900,376	97.9%
White	765,324	83.2%
African American	94,925	10.3%
American Indian and Alaska Native	2,246	0.2%
Asian	28,251	3.1%
Native Hawaiian and Other Pacific Islander	757	0.1%
Other Race	8,873	1.0%
Population of Two or More Races:	19,639	2.1%
Two Races Including Some Other Race	2,618	0.3%
Two Races Excluding Some Other Race & Three or More Races	17,021	1.9%
Population of Two Races:	18,680	2.0%
White; African American	7,181	0.8%
White; American Indian and Alaska Native	3,151	0.3%
White; Asian	4,200	0.5%
African American; American Indian and Alaska Native	267	0.0%
All Other Two Race Combinations	3,881	0.4%
Population of Three Races	884	0.1%
Population of Four or More Races	75	0.0%

Source: US Census Bureau, 2009-2013 5-Year American Community Survey

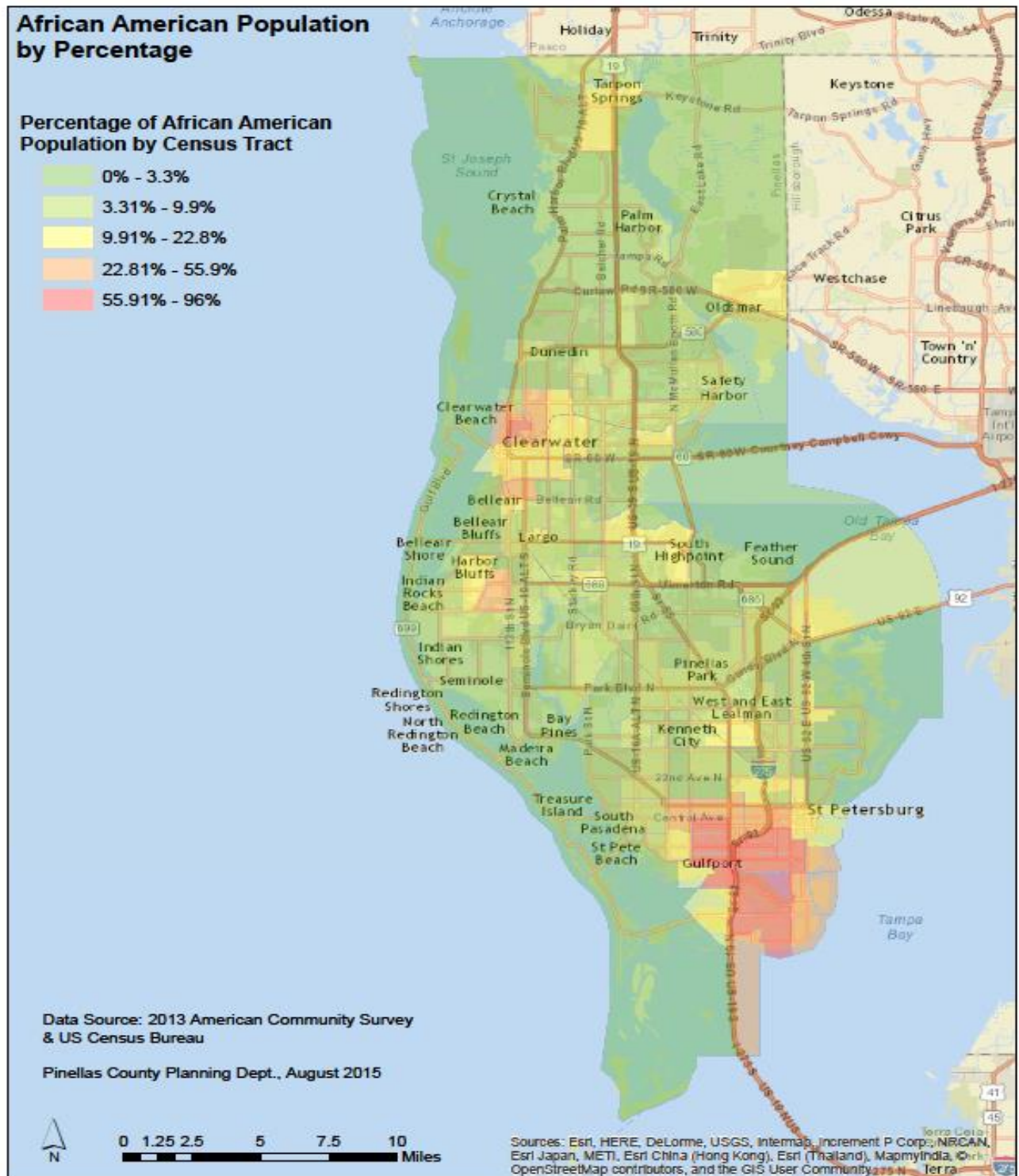
Included in Maps 1, 2 and 3 are the population percentages by census tract of the three largest racial minority groups in the County. As can be seen there are several areas of the County which are clusters of racial or ethnic minorities, including: Southeast St. Petersburg, the Greater Ridgecrest Area in unincorporated Largo, and areas of Clearwater and Tarpon Springs. Although some areas of the County offer a more integrated community composition, a significant portion of the County is composed of predominantly White neighborhoods.

Table 3: Pinellas County Race and Ethnicity

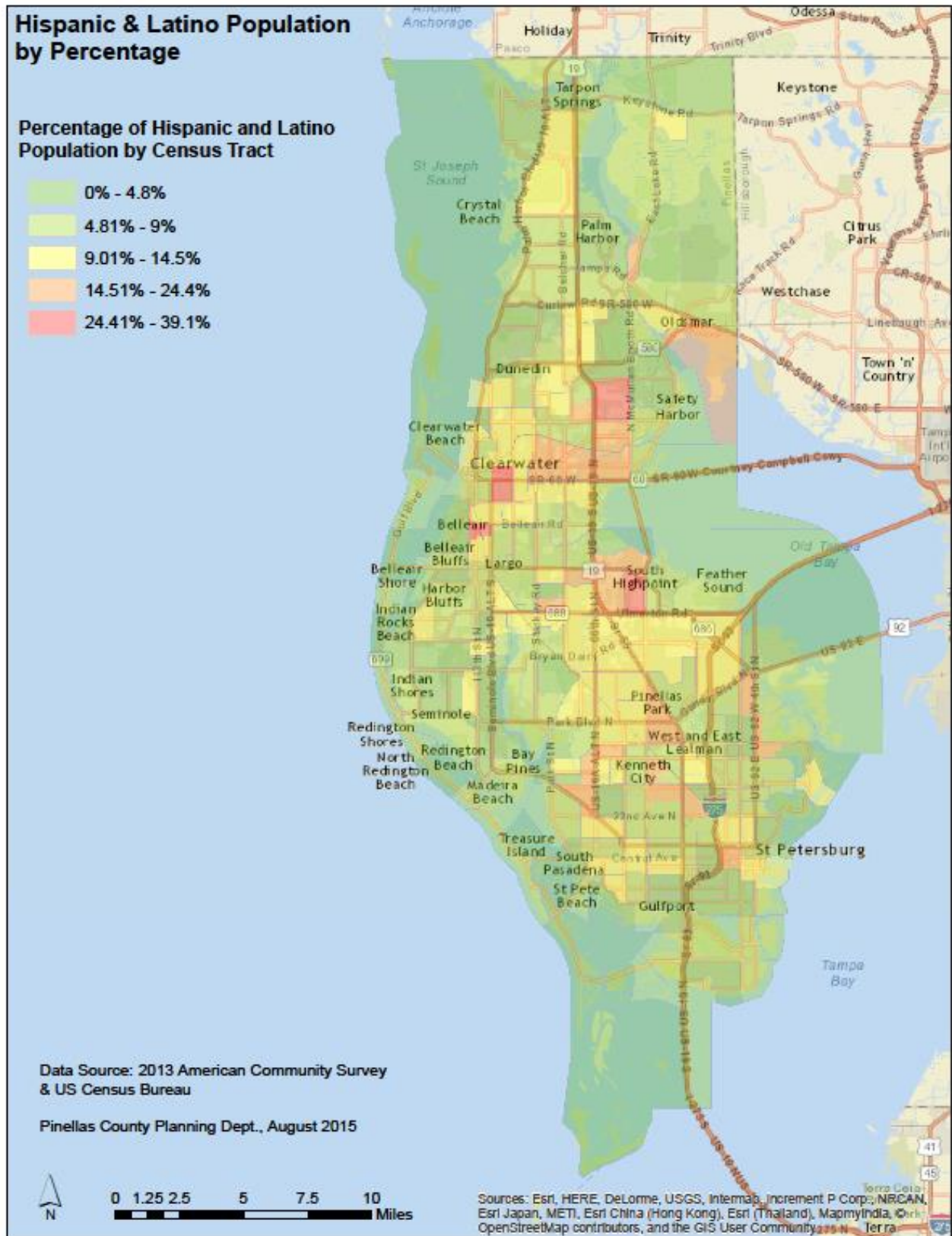
Hispanic or Latino and Race	Estimate	% of Total Pop.
Total:	920,015	100%
Hispanic or Latino (of any Race)	75,821	8.2%
Mexican	20,792	2.3%
Puerto Rican	23,009	2.5%
Cuban	9,764	1.1%
Other Hispanic or Latino	22,256	2.4%
Not Hispanic or Latino	844,194	91.8%
White Alone	703,115	76.4%
African American Alone	93,099	10.1%
American Indian and Alaska Native Alone	2,042	0.2%
Asian Alone	28,111	3.1%
Native Hawaiian and Other Pacific Island Alone	707	0.1%
Some Other Race Alone	1,219	0.1%
Two or More Races	15,901	1.7%
Two Races Including Some Other Race	674	0.1%
Two Races Excluding Some Other Race & Three or More Races	15,227	1.7%

Source: US Census Bureau, 2009-2013 5-Year American Community Survey

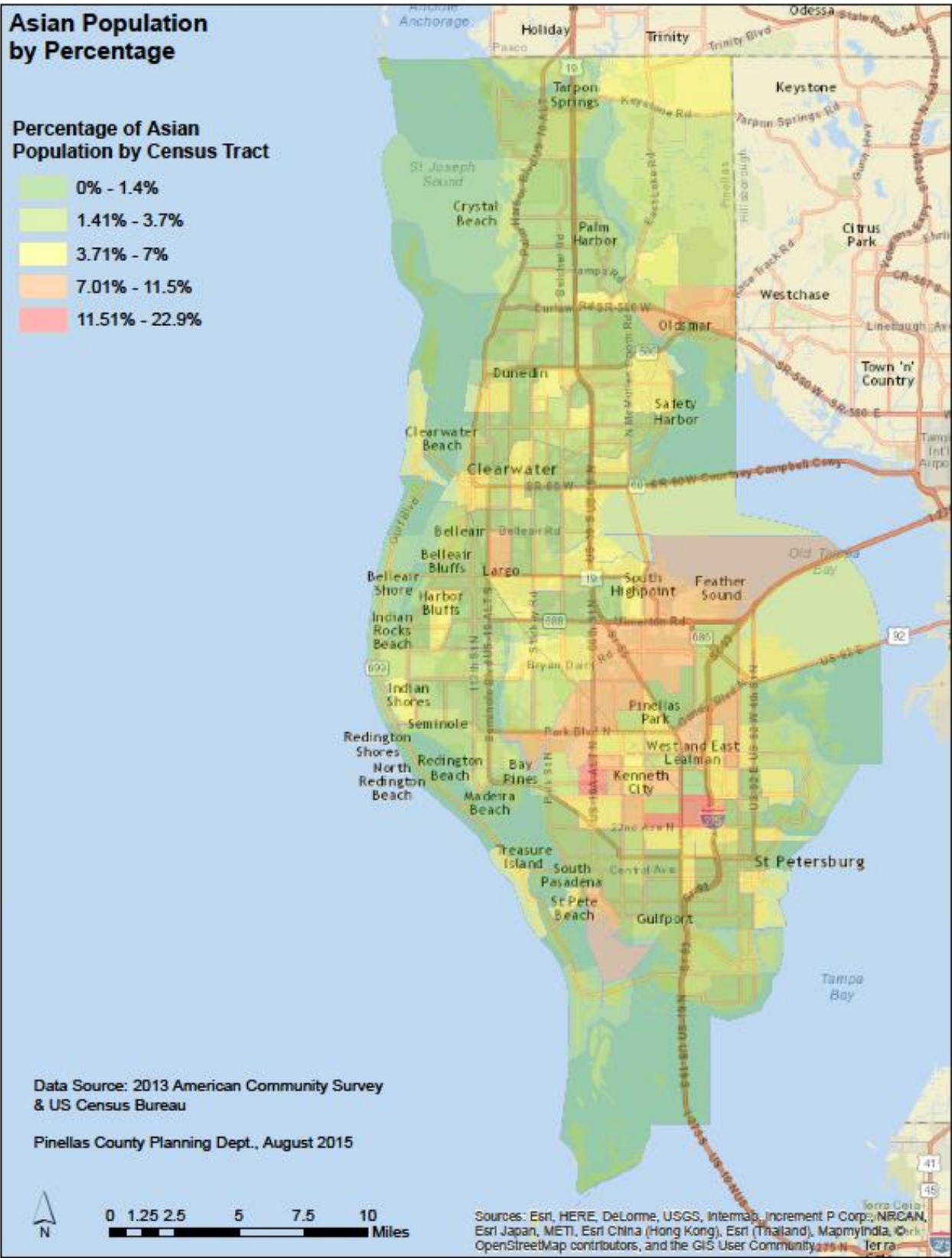
Map 1: African American Population by Census Tract



Map 2: Hispanic and Latino Population by Census Tract



Map 3: Asian Population by Census Tract



Nativity and Language

Pinellas County is home to 31.4 percent of native Floridians (2013 ASC); slightly more than eleven percent (11.4 percent) of Pinellas County residents are foreign born (2009-2013 ACS) and of those 55.4 percent are naturalized citizens. Interestingly, when compared to the national and state data, Pinellas County has a smaller foreign born population (US - 12.9 percent, FL - 19.4 percent), but a higher percentage of residents who are naturalized (US - 45.1 percent, FL - 50.6 percent)*. This indicates that although fewer of Pinellas County's residents are foreign born, a larger portion of those that are have become citizens. Another item of consideration for the County is the fact that 24.3 percent of foreign born residents are of Hispanic or Latino origin (of any race), a significantly smaller ratio than the national (46.5 percent) or state (56.8 percent) levels.

Most (86.8 percent) of Pinellas County's residents over five years of age speak only English, while 5.3 percent speak English "less than 'very well'" (2009-2013 ACS). This population is important to consider in policy making decisions, service delivery, and housing discrimination issues. Almost half (45.7 percent) of those who speak another language at home, speak Spanish or Spanish Creole (2009-2013 ACS). Those Spanish speakers who are foreign born are significantly less likely to be naturalized, with only 18.6 percent becoming citizens*. The 2013 American Community Survey estimates that 3.0 percent of Pinellas County households do not include English speakers (defined as those who only speak English or speak English "very well", age 14 and older). Over a quarter (26.3 percent) of these households is Spanish speaking, 23.3 percent speak a language of Asian or Pacific Island origin, 17.5 percent speak Indo-European languages, and 11.8 percent are defined as "other".

Per research released by the Bureau of Economic and Business Research, University of Florida, of the 3.0 percent Asian population in Pinellas County, the largest group within in the Asian population is Vietnamese at 30.0 percent. Asians were the fastest growing racial group in Florida and the United States from 2000 to 2010; the Asian-alone population increased by 70.8% in Florida but only by 43.3% in the United States. If trends continue, Asians will soon exceed the 500,000 mark in Florida.

*Note: The data only enumerates those individuals who have become citizens, with no indication to the immigration status of other foreign born residents.

Households and Families

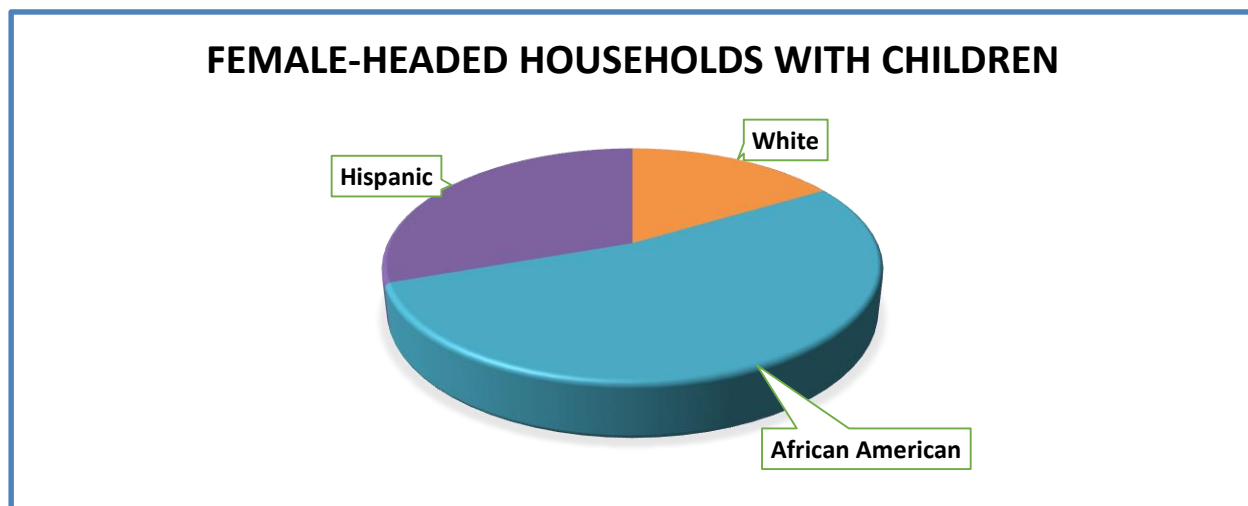
In the 2009-2013 reporting period for the American Community Survey, there were 401,708 households (occupied housing units) in Pinellas County; the average household size was 2.24 people, while the average family size is 2.97 people.

Families made up 55.6 percent of the households in Pinellas County; of this figure, married-couple families account for 72.9 percent, male householders with no wife present account for 7 percent, and female householders with no husband present account for 20.1 percent of family households. Nonfamily households made up 44.4 percent of all households in Pinellas County. Most (83.4 percent) of the nonfamily households were people living alone, with a small minority of households comprised of people living in households in which no one was related to the householder. Of note, 30.4 percent (approximately 54,290 people) of the nonfamily households are at least 65 years old and living alone.

When considering all family types with children present, the data indicates that 54.5 percent of all White households, 59.9 percent of all African American households, and 64.7 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics compared in Chart 2; the percentage of female-headed households with children among White households was 9.3 percent, compared to 30.1 percent in African American households, and 17.2 percent in Hispanic households.

Non-family households among Whites made up 45.5 percent of all White households in Pinellas County. Non-family households among African Americans accounted for 40.1 percent of all African American households. Non-family households among Hispanics accounted for 35.3 percent of all Hispanic households.

Chart 2: Female-Headed Households with Children



Source: US Census Bureau, 2009-2013 5-Year American Community Survey

HUD's Violence Against Women Reauthorization Act of 2013 (VAWA) provides for public housing for women who have been victims of domestic violence and their children. VAWA may play a role in the fairly large group of female householders with no husband present (11.2 percent). For reference, Community Action Stops Abuse (CASA) is a nonprofit group based in St. Petersburg that provides services to victims of domestic violence. CASA indicated that for their fiscal year 2014-2015 they sheltered 219 women and 87 children; 1,487 were turned away due to a lack of space, however CASA was able to provide other types of assistance to these women. Additionally, CASA received 4,547 calls to their hotline. HUD's guidelines can play a role in ensuring that a woman's status as a victim of domestic violence does not pose as an impediment in housing choices. Religious Community Services (RCS) located in Clearwater is a nonprofit group also, that sheltered 198 adult females and 128 children for a total of 11,500 bed nights and answered 2,897 hotline calls for the fiscal year 2014-2015. RCS also operates Grace House for homeless families, a permanent housing facility with 2 and 3 bedroom apartments, including case management services.

Disability

According to the 2009-2013 American Community Survey, in Pinellas County, there are over fourteen percent (14.3 percent), or 129,840 individuals with disabilities. Over ten percent (10.5 percent) of the population aged 18 to 64 years old had one or more disabilities; thirty-four percent of the population aged 64 and older reported having one or more disabilities. Table 4 below indicates the estimates of the population with disabilities by age group.

Table 4: Population with Disabilities by Age Group for 2013

Subject	Number with a Disability	Percent with a Disability
Total civilian non-institutionalized population	129,840	14.3%
Population under 5 years	189	0.4%
With a hearing difficulty	148	0.3%
With a vision difficulty	54	0.1%
Population 5 to 17 years	5,879	4.9%
With a hearing difficulty	543	0.5%
With a vision difficulty	866	0.7%
With a cognitive difficulty	4,441	3.7%
With an ambulatory difficulty	857	0.7%
With a self-care difficulty	886	0.7%
Population 18 to 64 years	57,884	10.5%
With a hearing difficulty	9,530	1.7%
With a vision difficulty	9,449	1.7%
With a cognitive difficulty	24,813	4.5%
With an ambulatory difficulty	31,191	5.6%
With a self-care difficulty	10,905	2.0%
With an independent living difficulty	22,528	4.1%
Population 65 years and over	65,888	34.0%
With a hearing difficulty	28,202	14.6%
With a vision difficulty	11,654	6.0%
With a cognitive difficulty	15,722	8.1%
With an ambulatory difficulty	42,938	22.2%
With a self-care difficulty	14,523	7.5%
With an independent living difficulty	28,360	14.6%

Source: US Census Bureau, 2009-2013 5-Year American Community Survey

Veterans

Pinellas County's veteran population (94,997) over the age of 18 (2009-2013 ACS) is 12.5 percent of the total population. This figure is higher than the 9 percent national average, but is likely attributable to several factors including the presence of a VA Medical Center, proximity to Mac Dill Air Force Base and general appeal to retirees; in fact, 73.9 percent of Pinellas County veterans are 55 or older, as compared to the 66.8 percent national average.

Education

In the 2009-2013 reporting period for the American Community Survey, 88.9 percent of people 25 years and over had at least graduated from high school and 27.5 percent had a bachelor's degree or higher. Only 3.5 percent of those 25 years of age or older had no more than a 9th grade education.

Pinellas County school enrollment for those 3 years of age or older was 186,012 (2009-2013 ACS). Nursery school/preschool enrollment accounted for 5.8 percent of total enrollment; kindergarten through 12 grade was 64.5 percent of enrollment; 25 percent of enrolled individuals were those enrolled in college undergraduate work; and graduate students account for the other 4.7 percent. Median income is correlated to educational attainment, with those individuals with only a high school diploma earning 57.5 percent and 44.3 percent of what bachelor's degree graduate degree holders earn, respectively. Table 5 reflects this correlation and the relationship between median earnings of each category to the Pinellas County median individual income.

Table 5: Median Income of Those 25 and Older by Educational Attainment

Median Income	Estimate	% of Total
Less than high school graduate	\$ 20,184	61%
High school graduate (includes equivalency)	\$ 26,725	81%
Some college or associate's degree	\$ 32,105	97%
Bachelor's degree	\$ 46,483	141%
Graduate or professional degree	\$ 60,312	182%

Source: US Census Bureau, 2009-2013 5-Year American Community Survey

A correlation can also be seen for graduation rates for Pinellas County School District students by race. Table 6 summarizes this data for school years 2011-2012 through 2013-2014. Students identifying as Asian consistently graduate at the highest rates (above 80 percent for their racial group), followed by White students at 81 percent. Hispanic students graduate at over 60 percent consistently, with a major increase in the 2013-2014 school year to 71.2 percent. African American students have the lowest graduation rates for the County, but also saw an increase for the 2013-2014 school year. Even though graduation rates increased overall, African American students still graduated at lower rates than their peers.

Table 6: Graduation Rates by Race 2011-12 through 2013-14

Race/Ethnicity	2011-12 # Cohort	2011-12 # Grads	2011-12 % Grads	2012-13 # Cohort	2012-13 # Grads	2012-13 % Grads	2013-14 # Cohort	2013-14 % Grads	2013-14 % Grads
White	5,420	4,189	77.3%	5,394	4,135	76.7%	4,843	3,925	81.0%
Hispanic	631	380	60.2%	730	457	62.6%	877	624	71.2%
African American	1,384	756	54.6%	1,510	852	56.4%	1,388	843	60.7%
Two or More Races	298	209	70.1%	325	233	71.7%	244	184	75.4%
Asian	301	250	83.1%	306	264	86.3%	321	278	86.6%
American Indian	31	19	61.3%	20	15	75.0%	27	19	70.4%
Pacific Islander	-	-	-	-	-	-	-	-	-

Source: Florida Department of Education

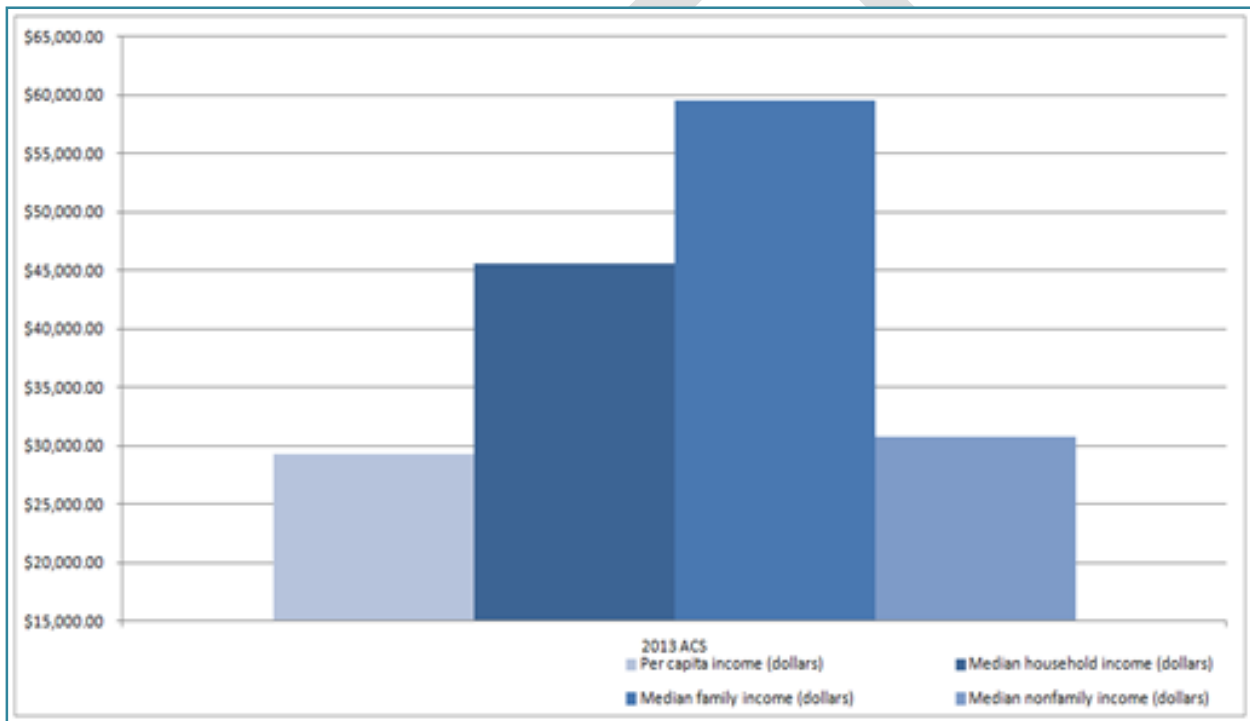
In August, 2015, an investigative series entitled *Failure Factories* and published in the Tampa Bay Times reported that 84.0 percent of predominantly African American elementary school students in the Pinellas County School District are failing state reading and math exams, are suspended out of school at four times the rate of other children, and are excluded from access to the school system's best public schools. This failure has been linked to the School District's abandonment of mandatory busing to achieve racial integration in 2008 and the concentration of this failure has been traced to five elementary schools located in African American communities in St. Petersburg. As of the submission of this report, the U.S. Department of Education has opened an investigation into whether the School District systematically discriminates against African American children.

The School District continues to hold public meetings and has recently released a proposal that includes hiring a minority achievement officer, creating special centers for students suspended out of school, financial incentives for teachers in the failing schools, and establishing a "transformation zone" with intense support for these five elementary schools. Additionally, legislators have earmarked \$400,000 for an intensive reading program with assistance from the University of Florida; Pinellas faith-based group Faith and Action for Strength Together (FAST) organized an annual gathering of 3,000 residents to address the issues at these five schools. The group requested, and the School Board agreed to create a supervised suspension program and implement a policy to stop non-violent disorderly conduct arrests in school, and to implement a core reading curriculum with a proven track record in the lowest performing schools. On June 10, 2016, the Tampa Bay Times published a follow up to their *Failure Factories* series, indicating that three of the five schools showed substantial improvement on this year's Florida Standards Assessment exams; some gains as large as 20 percentage points for the number of students with passing scores in math and English language.

Income

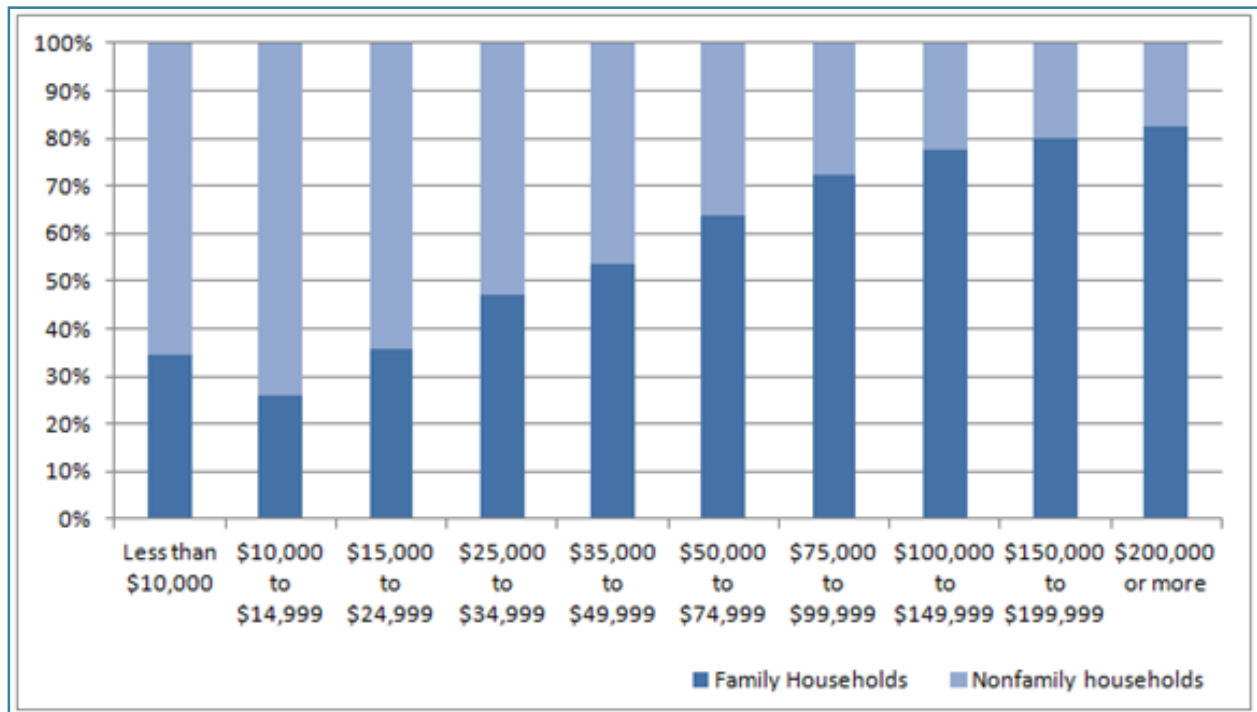
Based on the 2009-2013 American Community Survey, the per capita annual income for Pinellas County was \$29,262. The median annual income for households was \$45,535, which affords approximately \$1,138 a month for housing costs; the median annual family income was \$59,491, affording \$1,487 per month for housing costs; and the median non-family annual income of \$30,698 affording \$767. Slightly more than 69 percent of households (277,188) received earnings (wages), with a median wage for workers of \$30,378 annually, and nearly 37.8 percent of households (151,667) received Social Security, with the median income from Social Security at \$17,250 annually.

Chart 3: Selected Income Subjects for Pinellas County - 2013



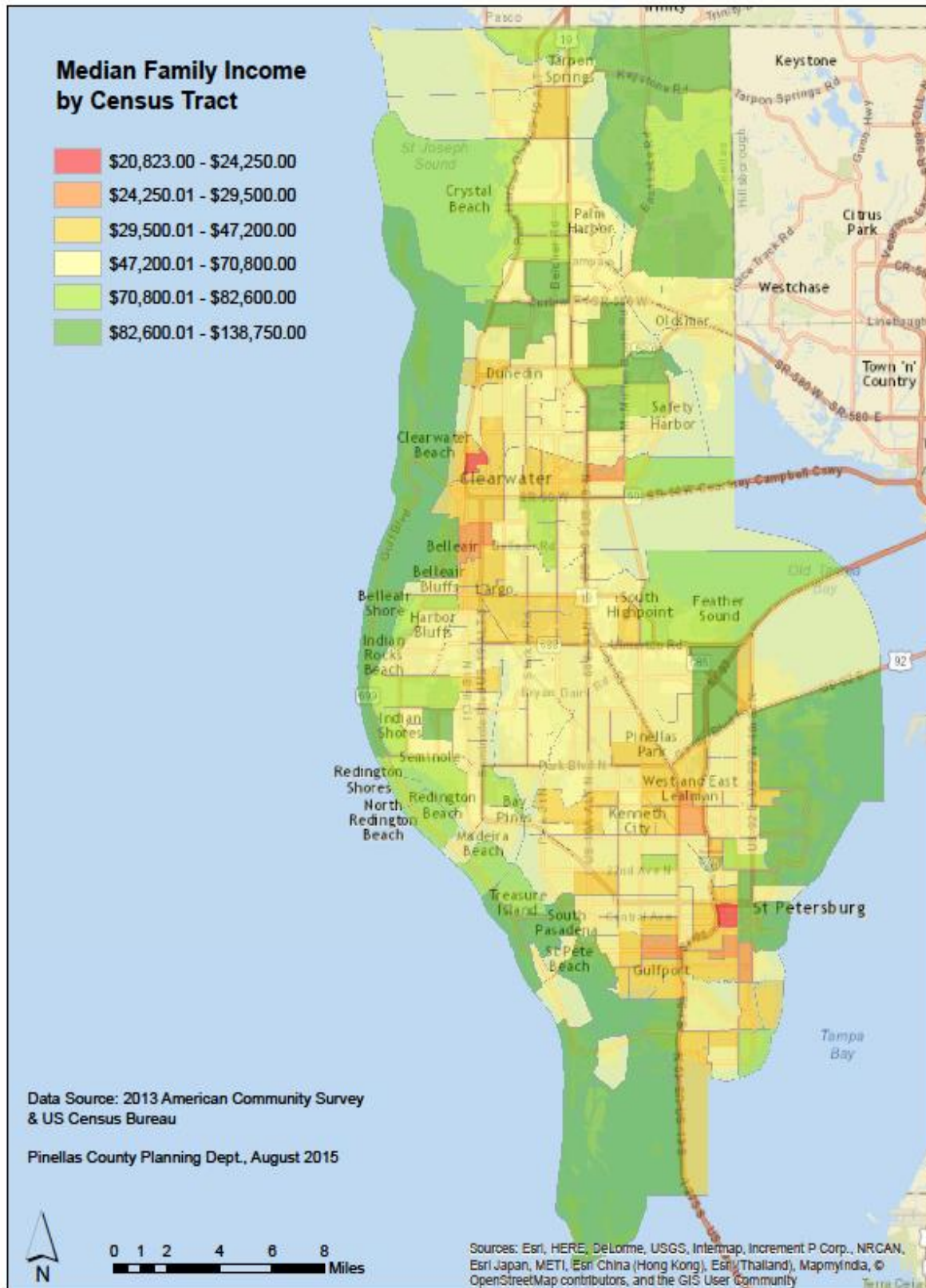
Source: US Census Bureau, 2009-2013 5-Year American Community Survey

Chart 4: Income for Total Households and Families - 2013



Source: US Census Bureau, 2009-2013 5-Year American Community Survey

Map 4: Median Income by Census Tract for Pinellas County - 2013



Poverty

According to the 2009-2013 American Community Survey, 14.1 percent of people in Pinellas County were in poverty. Over a fifth (20.6 percent) of related children under 18, 13.9 percent of adults (18-64 years old), and 8.9 percent of people at least 65 years old were below the poverty level. For all family types, 9.5 percent were below the poverty level and 5.0 percent of married families were below the poverty level. However, 23.8 percent of families consisting of female householders with no husband present families were below the poverty level.

Racial and ethnic groups are also disproportionately affected by poverty. Only 7.4 percent of White Pinellas County residents live in poverty; however, 26.9 percent of African Americans fall below the poverty level, followed by 26.2 percent of those who identify as “some other race”, and 12.8 percent of those who identify with two or more races. Individuals who identify as of Hispanic or Latino origin (of any race) also see higher rates of poverty rates (17.5 percent).

There are higher concentrations of individuals living below the poverty level in some areas of the County. Specifically these areas include South St. Petersburg, the Greater Ridgecrest Area in unincorporated Largo, Lealman, Highpoint, and North Greenwood, Lake Bellevue, and East Gateway in Clearwater and areas in northern Tarpon Springs.

Employment and Unemployment in Pinellas County

According to the 2009-2013 American Community Survey, fifty-nine percent (59.3 percent) of the population in Pinellas County aged 16 years and over were in the labor force. Females aged 16 years and over accounted for 227,242 in the civilian labor force. The size of the civilian labor force was 460,339, with an unemployment rate below eleven percent (10.5 percent).

Chart 5: Unemployment in Pinellas County by Age Group - 2013

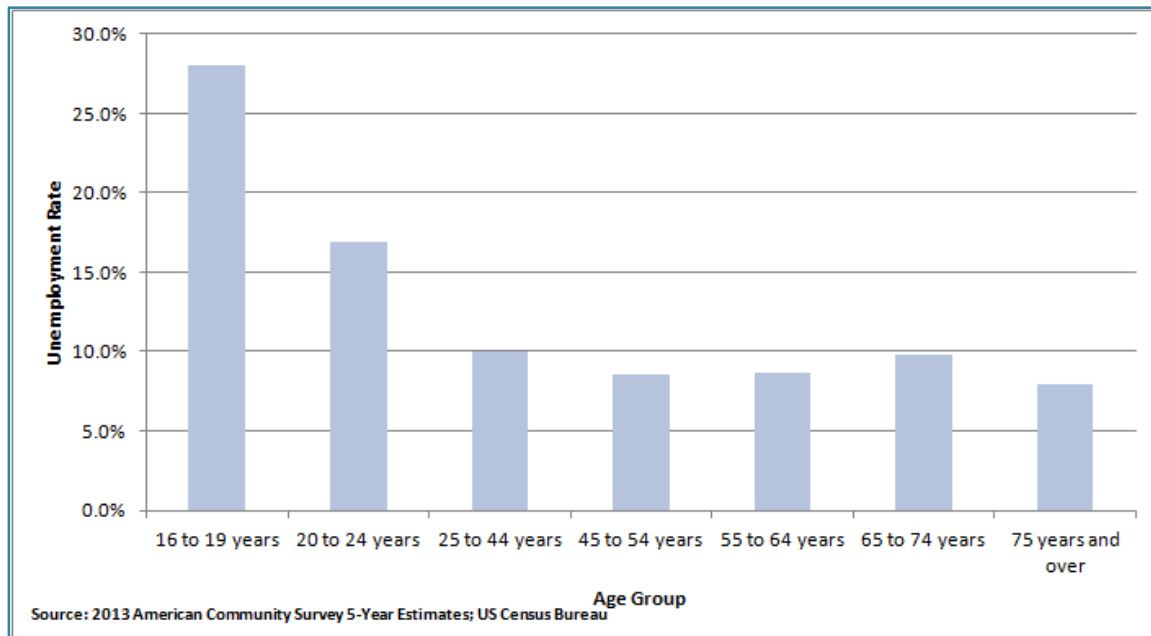
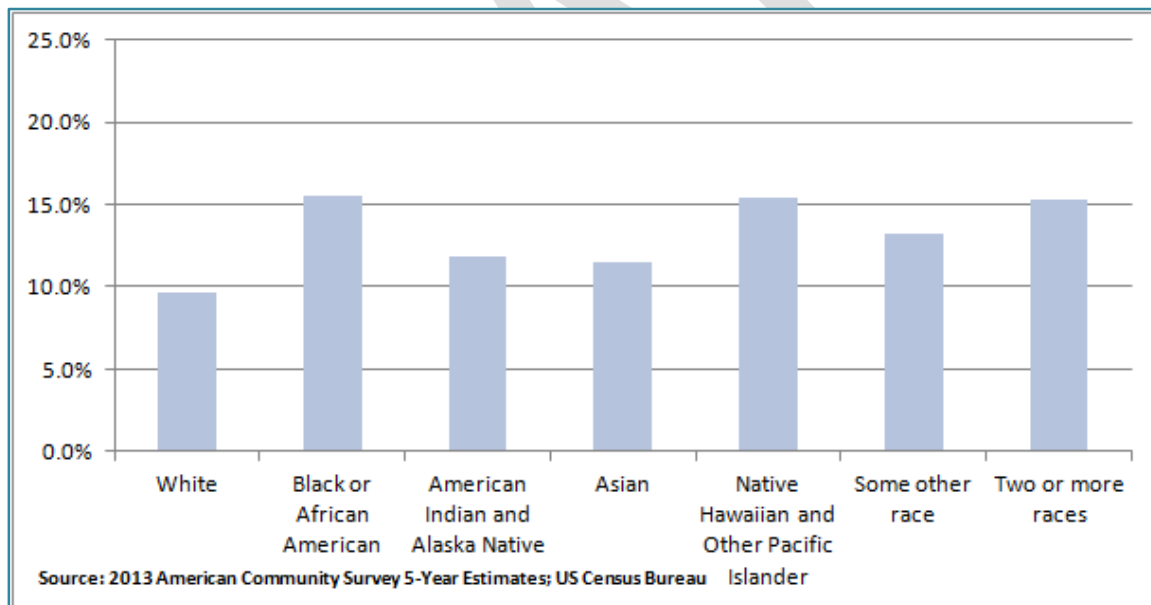


Chart 6: Unemployment in Pinellas County by Race - 2013



Employment by Industry in Pinellas County

The County Business Patterns (CBP) are annual sub-national economic data series utilizing the North American Industry Classification System (NAICS) to detail the number of establishments, level of employment for the week of March 12, 2013 first quarter payroll, and annual payroll. According to the 2013 County Business Patterns, there were 26,751 establishments in Pinellas

County, employing 365,099 paid employees as of the week of March 12, 2013. Health care and social assistance employed the most employees in a particular industry, accounting for 67,819 paid employees among 3,232 establishments. Retail trade was the second largest industry, employing 49,631 paid employees among 3,589 establishments. Accommodation and food services employed 42,650 paid employees among 2,114 establishments. Professional, scientific, and technical services had the most establishments, accounting for 4,009 establishments and employing 29,991 paid employees.

Table 7: Percent Employment by 2007 NAICS Industry - 2013

2007 NAICS Code Description	Percent
Health care and social assistance	18.58%
Retail trade	13.60%
Accommodation and food services	11.68%
Professional, scientific, and technical services	8.22%
Administrative and support and waste management and remediation services	7.87%
Manufacturing	7.70%
Finance and insurance	6.67%
Other services (except public administration)	4.78%
Wholesale trade	3.90%
Construction	3.80%
Management of companies and enterprises	3.00%
Information	2.73%
Arts, entertainment, and recreation	2.12%
Educational services	1.91%
Real estate and rental and leasing	1.77%
Transportation and warehousing	1.19%
Utilities	0.47%
Agriculture, forestry, fishing and hunting	--
Industries not classified	--
Mining, quarrying, and oil and gas extraction	--
-- Data not available	

Source: 2013 County Business Patterns; US Census Bureau

Table 8: Occupation by Sector - 2013

Occupation	Percent
Civilian Employed Population 16 years and Over: 412,104	
Management, business, science, and arts occupations	37.3%
Sales and office occupations	28.8%
Service Occupations	17.8%
Production, transportation, and material moving occupations	8.8%
Natural resources, construction, and maintenance occupations	7.3%

Source: 2013 County Business Patterns; US Census Bureau

Largest Employers in Pinellas County

Table 9 below lists the top ten largest employers as of 2014. The Pinellas County School District is the largest employer in Pinellas County, accounting for nearly thirty-nine percent (38.82 percent) of the total County employment.

Table 9: Top Ten Largest Employers - 2014

Employer	Employees	Percentage of Total County Employment
Pinellas County School District	15,928	38.82%
Bay Pines VA Medical Center	4,406	10.74%
City of St. Petersburg	3,112	7.58%
All Children's Hospital	2,950	7.19%
St. Petersburg College	2,744	6.69%
Pinellas County Sheriff	2,693	6.56%
Morton Plant Hospital	2,525	6.15%
Raymond James	2,475	6.03%
Home Shopping Network	2,150	5.24%
Mease Hospital	2,050	5.00%

Source: Florida Research and Economic Database

Transportation

Pinellas Suncoast Transit Authority (PSTA) provides public transportation services throughout Pinellas County, operating 40 routes including 2 express routes to Tampa. In fiscal year 2012-2013, total annual ridership was just shy of 14.5 million and the ridership on an average weekday was 45,864. The services provided by the PSTA include bus services, "bikes on buses, services for seniors, disabled, and low-income individuals as well as beach trolley services. Regional programs include express bus routes that travel from Pinellas County to Pasco County. PSTA operates

Suncoast Beach Trolley, Central Avenue Trolley and the East Lake Shuttle, and trolley services are also provided by various other agencies, such as the Pinellas County Jolley Trolley, Gulfport Trolley and the St. Pete Looper Trolley. The PSTA provides demand response transportation services (DART) for people who, because of their disability, are unable to independently use the regular, accessible PSTA buses; demand response services are provided wherever regular PSTA bus service is available. PSTA also provides 50 percent reduced fares for adult students, persons 18 years or younger and senior citizens.

Pinellas County's Transportation Disadvantaged (TD) Program is a state-funded program, operated by PSTA, which provides low-cost transportation throughout the County to residents who qualify as "transportation disadvantaged". Transportation disadvantaged means that a person, due to physical or mental disability, age or income status, does not have transportation available or cannot purchase transportation to get access to medical treatment, life-sustaining activities (i.e., travel to grocery store, nutritional dining sites, utility companies to pay bills, social security offices, and banks); employment and education trips to help obtain or keep a job are dependent upon availability of funds. The current income guidelines for an \$11 monthly pass ranges from family of 1 with \$1,471 per month or less income to a family size of 8 with \$5,111 per month or less of income. If bus service is unavailable to a rider's location, door-to-door service via taxi is available for \$3 per trip. PSTA also offers reduced fares for youths 18 years of age or under, adult students, senior citizens and disabled residents at \$1.10 per trip or \$35 for a monthly pass; full price fare is \$2.25 per trip or \$70 for a monthly pass.

Regional programs include express bus routes that travel from Pinellas County to Pasco County. PSTA operates Suncoast Beach Trolley, and trolley services are also provided by various other agencies, such as the Pinellas County Jolley Trolley, Central Avenue Shuttle, Gulfport Trolley and Eastlake Shuttle.

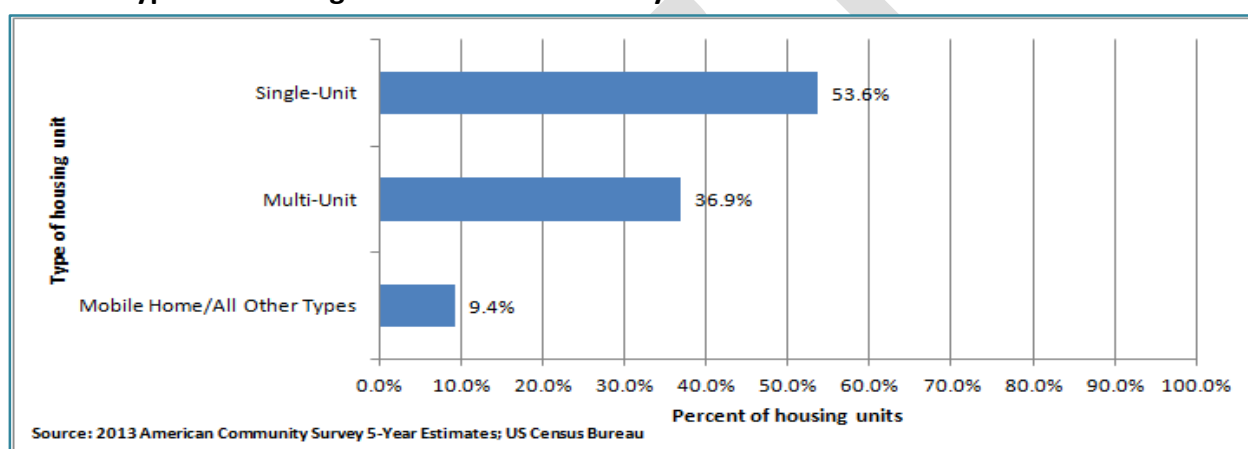
When comparing the PSTA route map located at (<http://www.psta.net/systemmap.php>) in relation to highly concentrated areas of public housing and poverty, the East Tarpon Springs appears to be grossly underserved with only two north-south bus routes; one runs only once per hour along Alternate Route 19 (Route 66), and the other runs along U.S. Route 19 (Route 19) alternating between 15 and 20 minutes. Both bus routes include a short east-west route along Martin Luther King, Jr. Boulevard to Tarpon Mall, which is south of East Tarpon Road; however there is no east-west route north of East Tarpon Avenue forcing residents to walk up to one mile for bus service.

Section II: Housing Profile

Housing Characteristics

The 2009-2013 American Community Survey indicated that Pinellas County had a total of 502,308 housing units, of which twenty percent (20 percent) were vacant. Single-unit structures accounted for approximately fifty-four percent (53.6 percent) of the total housing units, with multi-unit structures accounting for nearly thirty-seven percent (36.9 percent) of housing units. Mobile homes and other units accounted for over nine percent (9.4 percent) of the total housing units. Nearly sixteen percent (15.8 percent) of housing units were built since 1990.

Chart 7: Types of Housing Units in Pinellas County - 2013



Occupied Housing Units

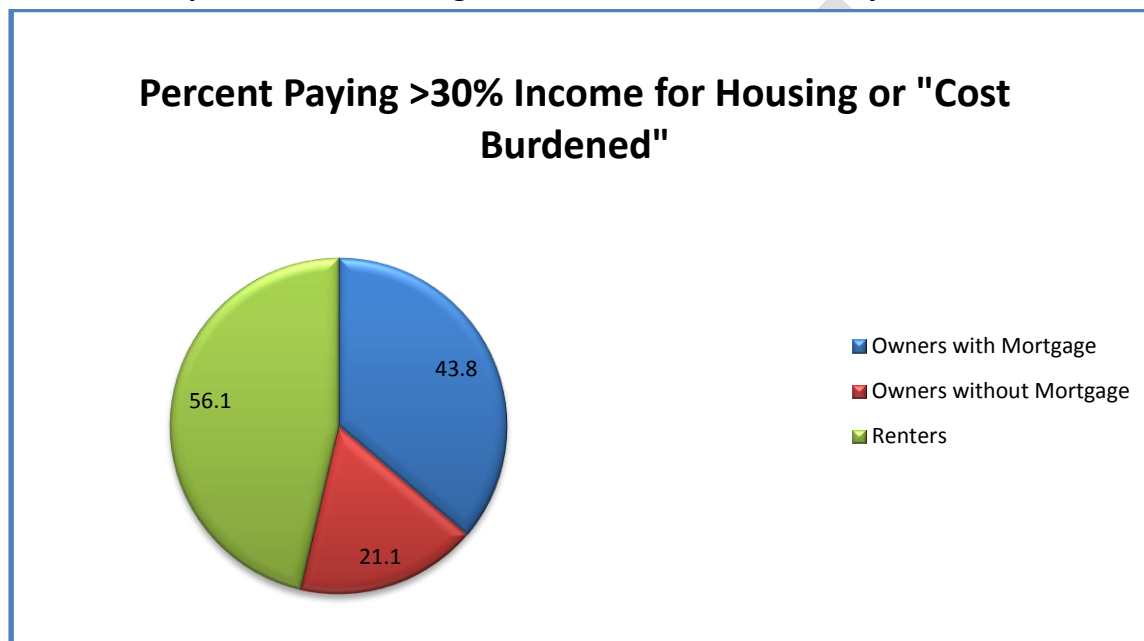
According to the American Community Survey in 2009-2013, Pinellas County had 401,708 occupied housing units; of the occupied units, 268,957 or 67.0 percent, were owner occupied, and 132,751 or 33.0 percent were rental units. A total of 5,532 units or 1.4 percent of the housing stock is defined as substandard, meaning units that had incomplete facilities such as a bathroom or kitchen, and 3.0 percent of the households were reported to not have telephone service. Of the occupied housing units, 8.8 percent households did not have access to a car, truck, or van for private use; approximately 46.4 percent had one vehicle, 34.8 percent had two vehicles, and 10.0 percent had three or more vehicles.

Housing Costs

In the 2009-2013 American Community Survey, the median monthly housing cost for mortgaged homeowners in Pinellas County was \$1,502 with 43.8 percent of these mortgaged home owners

considered cost-burdened, meaning that they spent more than thirty percent (30.0 percent) of their household income; for non-mortgage owners, the median monthly housing cost was \$509 with 21.1 percent considered cost-burdened. For renters, the median monthly housing cost was \$947, and 56.1 percent of renters in Pinellas County were considered cost-burdened. Based on these percentages, 41.5 percent of households in Pinellas County were considered cost-burdened.

Chart 8: Occupants with a Housing Cost Burden in Pinellas County - 2013



Housing Cost by Location

Pinellas County's housing market varies based on location. These distinctions can be seen in both rent and sales values. Utilizing sales and rental data from Zillow Real Estate Research, Pinellas County beach cities garner the highest prices for both sectors. At the same time, the cities with the lowest rental and sales prices are clustered around the center of the County. As discussed previously, these areas also tend to be areas of lower income and higher concentrations of minority populations. The only outlier seems to be Belleair Bluffs, which has a lower median rent compared with its median sales price. However, this is likely due to the fact that this area has higher owner occupancy and few rental units. Zillow's median rent per square foot data also reveals that this value is also in line with the median. This likely indicates that the few rental units that are available in the Belleair Bluffs are relatively small in size. Table 10 outlines the rent and sale prices for the various cities or areas of the County. Important to note, Zillow Real Estate Research utilizes its own methodology for determining their values, including their own boundary definitions for various cities, which may or may not match the jurisdictional boundaries of

incorporated municipalities; however, this data is deemed a useful source in getting an overview of the Pinellas County real estate housing market.

Table 10: Rent and Sales Prices in Various Pinellas County Cities/Areas - 2013

City	Rent/Month	Sales Price
South Highpoint	\$723	\$69,867
West and East Lealman	\$770	\$69,867
Belleair Bluffs	\$860	\$151,525
Largo	\$916	\$102,550
Saint Petersburg	\$935	\$114,392
Ridgecrest	\$950	\$88,658
Pinellas Park	\$988	\$92,642
Feather Sound	\$1,034	\$129,433
Palm Harbor	\$1,068	\$167,183
Dunedin	\$1,097	\$143,342
Oldsmar	\$1,122	\$140,067
Gulfport	\$1,122	\$112,642
Clearwater	\$1,152	\$136,733
Seminole	\$1,268	\$149,467
South Pasadena	\$1,296	\$139,267
Belleair	\$1,321	\$257,242
Tarpon Springs	\$1,325	\$165,725
Safety Harbor	\$1,348	\$196,175
Madeira Beach	\$1,393	\$329,267
Treasure Island	\$1,710	\$261,967
Saint Pete Beach	\$1,790	\$299,117
Indian Rocks Beach	\$1,841	\$344,083
Indian Shores	\$1,860	\$293,392
Redington Beach	\$1,958	\$404,050
Harbor Bluffs	\$2,000	\$276,292
Tierra Verde	\$2,133	\$365,992
Redington Shores	\$2,141	\$341,833
North Redington Beach	\$2,272	\$443,908
Belleair Beach	\$2,273	\$410,825

Green shading indicates areas where the “average” family can purchase a home

For an “average” Pinellas County family of 3 (rounded up from 2.97) with a median income of \$59,491, housing affordability as defined by HUD as 30.0 percent or less of income, indicates that no more than \$17,847 annually or \$1,487 monthly including utilities could be spent on housing. The purchasing power of \$1,487/month translates to a home purchase price of \$165,000 to \$195,000 (depending on amount of down payment and interest rate), indicating that the “average” family could afford to buy or rent in many parts of the County (shaded in green on Table 10).

Housing Affordability for Renters

Per the 2009-2013 American Community Survey, of the 502,308 housing units in Pinellas County, 33.0 percent are renter occupied; of this amount, over half (55.1 percent) of renters are cost burdened, spending 30.0 percent or more of their income on housing costs. Median rent was \$947, however 5,404 households reported paying no rent.

Housing Affordability for Homeowners

According to the 2009-2013 American Community Survey, Pinellas County homeowners accounted for 67.0 percent of occupied housing units with 155,864 or 58.0 percent of them having mortgages. Of the housing units occupied by homeowners, 41.7 percent were cost burdened, spending 30.0 percent or more of their income on housing costs. Among those who carried a mortgage, 44.8 percent were cost burdened as compared to 23.2 percent of those with no mortgage, yet still cost burdened.

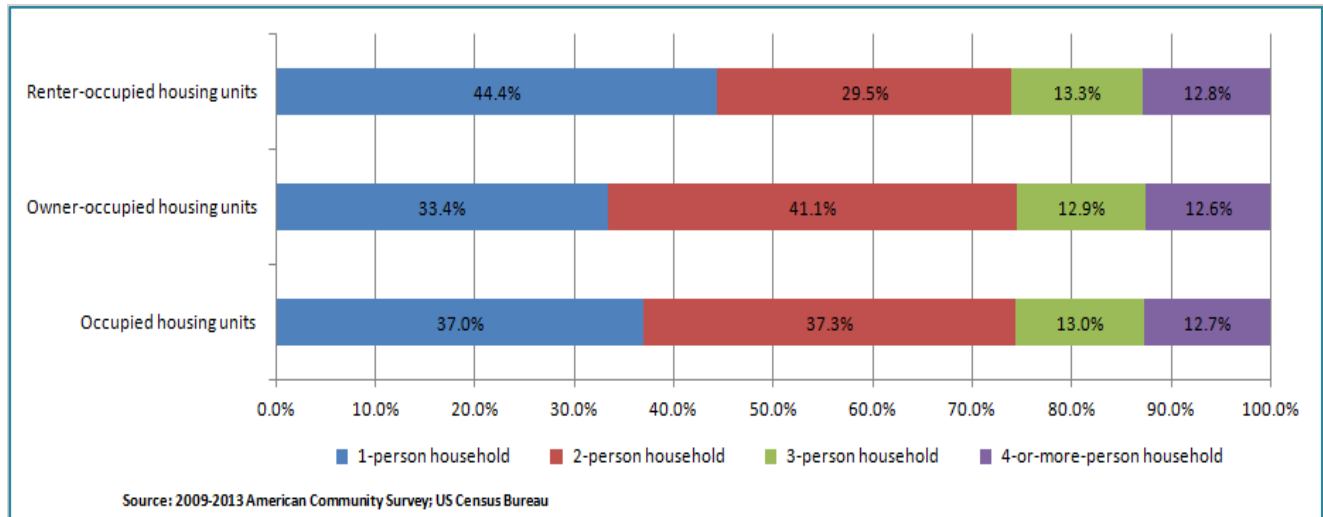
The median monthly housing cost for those with mortgages was \$1,502; those without mortgages spent \$509. Households with mortgages had significantly higher median incomes versus their mortgage free counterparts (\$67,793 versus \$38,378), and higher median home values (\$164,800 versus \$118,100). Several factors may play into these differences, most notably those without mortgages may be older residents who have paid off their mortgages and are more likely to occupy older homes, smaller homes, therefore potentially explaining lower values. Other explanations could account for these differences, however considering Pinellas County’s high population of those over 50 years of age, this reasoning is plausible.

Family Sized Housing Needs

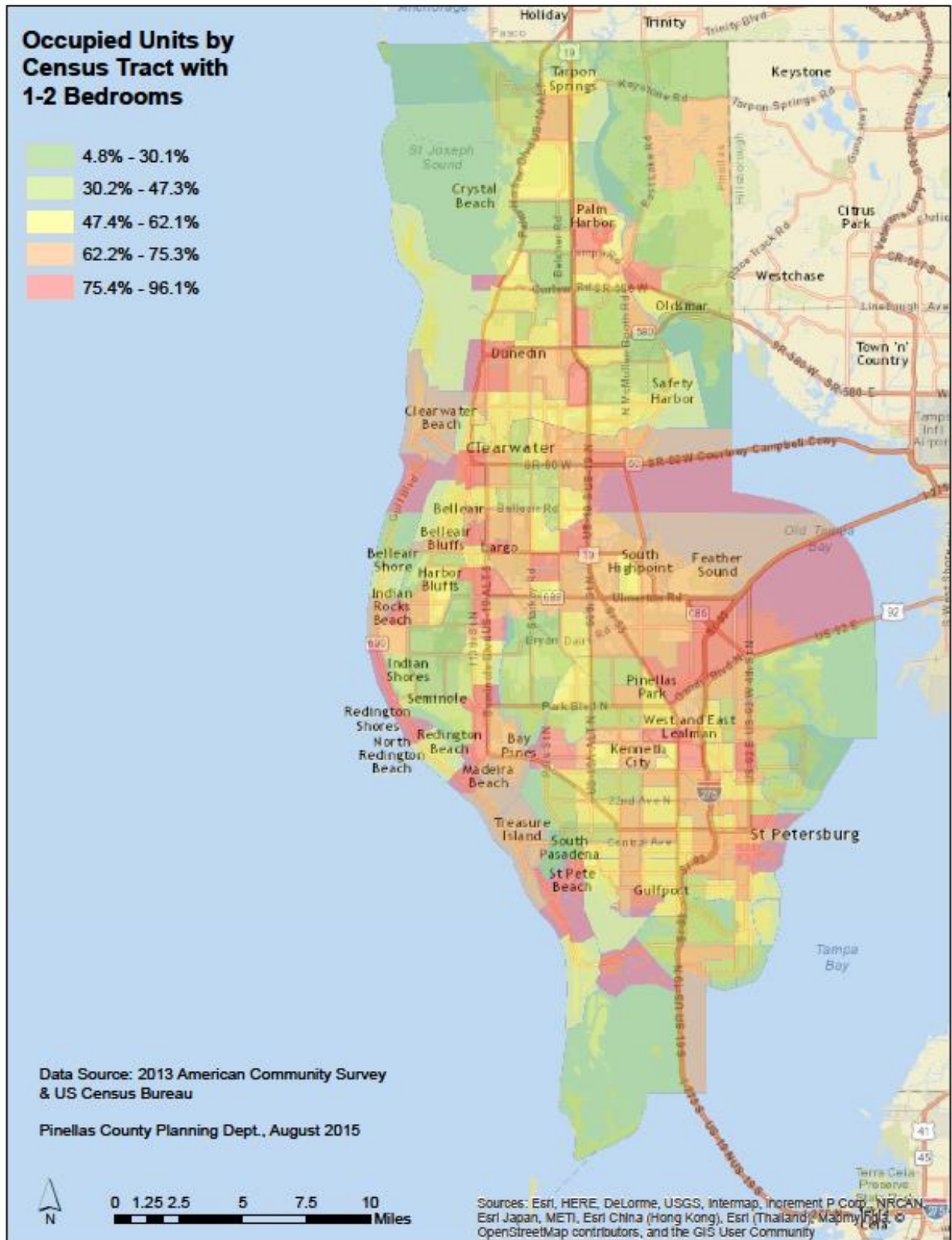
According to the 2009-2013 American Community Survey, the average household size in Pinellas County was 2.24. One-person households account for 37.0 percent of occupied units; two-person households account for 37.3 percent of occupied units; three-person households account for

13.0 percent of occupied housing units; four-or-more-person households account for 12.7 percent. For owner-occupied units, the average household size was 2.26, and 74.5 percent are one-two person households. For renter-occupied units, the average household size was 2.21, and 73.9 percent are one-two person households.

Chart 9: Housing Units by Household Size - 2013

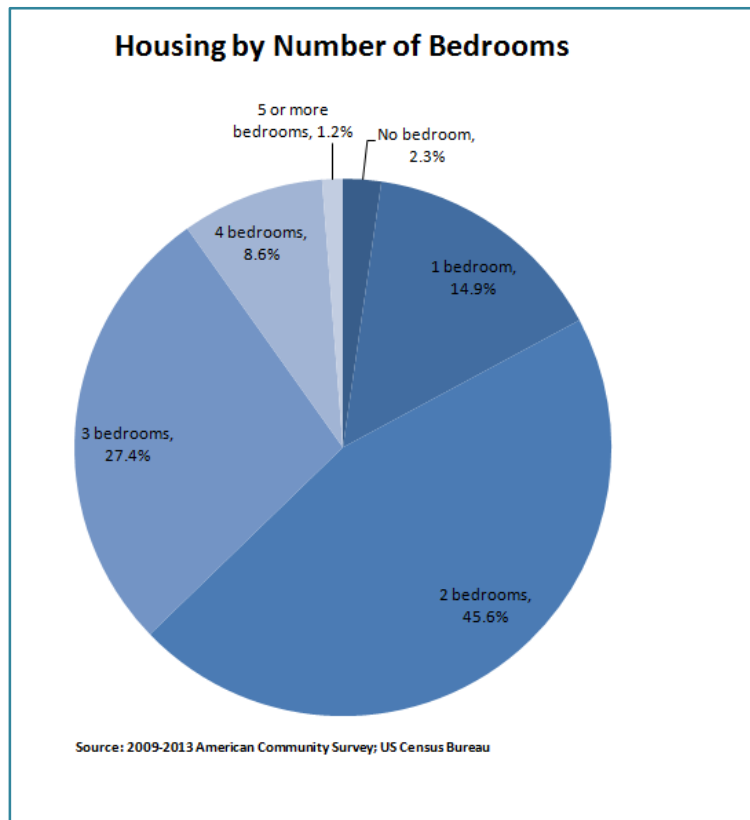


Map 5: Occupied Units with More than One Person per Bedroom

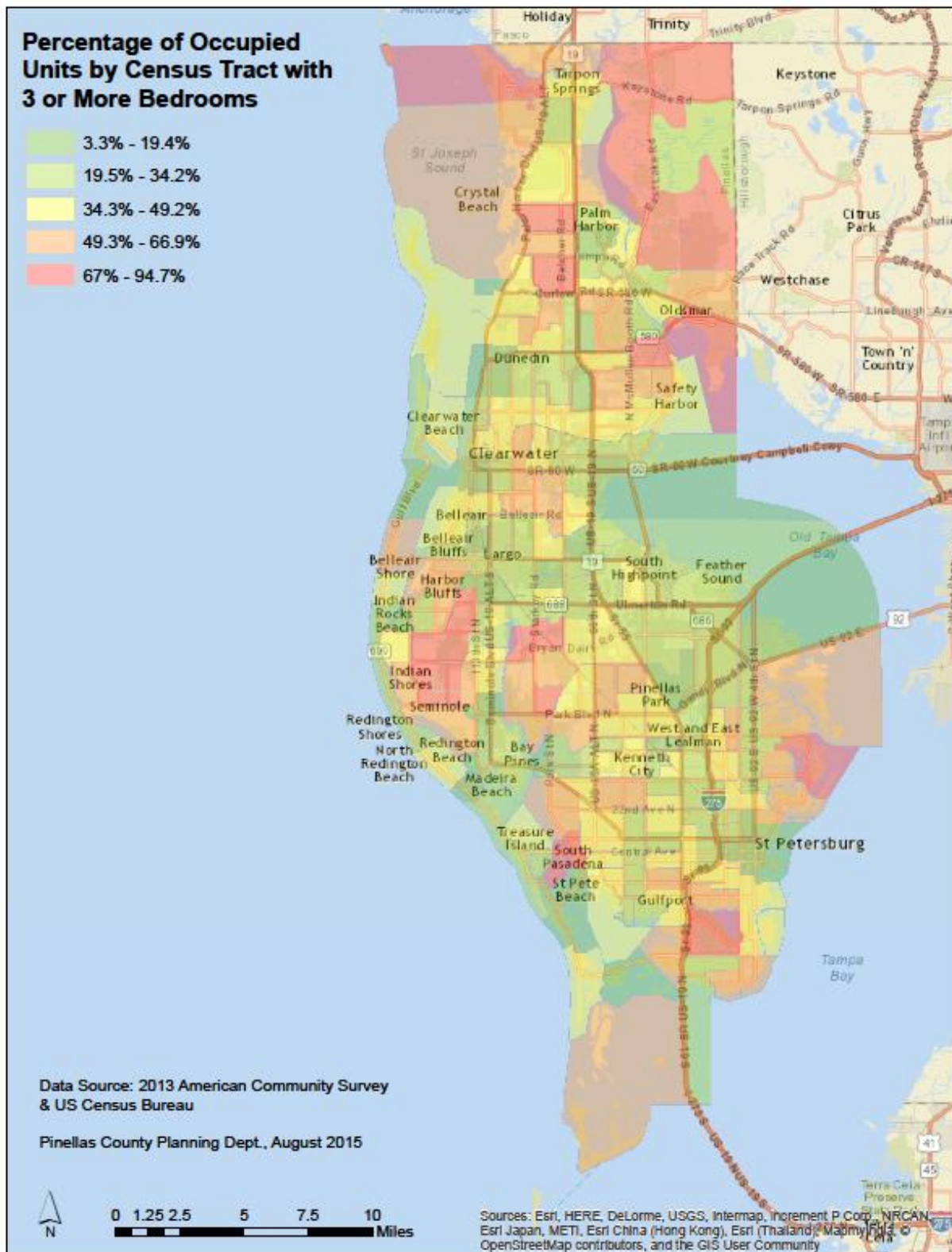


The needs of households vary based on the size of the household. According to the 2009-2013 American Community Survey, single bedroom units accounted for nearly fifteen percent (14.9 percent) of housing units. Two bedroom units accounted for over forty-five percent (45.6 percent) of housing units. About thirty-seven percent (37.2 percent), or 187,049 units, have three or more bedrooms. Across Pinellas County, there is an even distribution of housing units with more than three bedrooms.

Chart 10: Housing by Number of Bedrooms



Map 6: Occupied Units with Three or More Bedrooms



Housing and Transportation Cost Burden

For Pinellas County, according to the 2009-2013 American Community Survey, over eighty percent (80.7 percent) of workers drove to work alone, while just over eight percent (8.3 percent) carpooled. About two percent (1.7 percent) took public transportation; just over four percent (4.2 percent) used alternative means. The remaining population of just over five percent (5.1 percent) worked at home. The average commute time for those who commuted to work was a little over twenty-three (23.4) minutes. Approximately thirty-eight percent (37.8 percent) of commuters experienced commutes longer than twenty-four (24) minutes.

Housing Authorities, Subsidized Housing Policy, and Subsidized Low Income Housing

Subsidized public housing is provided several housing authorities functioning in the County. The four independent agencies are: Pinellas County Housing Authority (PCHA), St. Petersburg Housing Authority (SPHA) which administers the Dunedin Housing Authority program (DHA), Clearwater Housing Authority (CHA), and Tarpon Springs Housing Authority (TSHA). The services and units provided by the various agencies is included in Table 11.

Table 11: Housing Programs Provided by Housing Authority

	PCHA/DHA	SPHA	CHA	TSHA	TOTAL
Affordable Housing	1,051	34	-	-	1,085
Public Housing	1,729	371	222	274	2,596
Housing Choice Vouchers (HCV)	3,086	3,340	1,137	-	7,563
Veterans Affairs Supported Housing (VASH)	384	229	-	-	613

Each program assists Pinellas County's low income residents with the opportunity to reside in housing which they can afford. Affordable housing is designed to provide below market priced housing for low income residents. Public housing programs for low income residents provide subsidies and require residents to pay 30.0 percent of their income toward the cost of the unit. Housing Choice Vouchers, formerly known as Section 8 Vouchers, are meant to allow low income residents to find housing in neighborhoods and housing types of their choice by providing subsidies to the landlords. Thirty percent of income is also required with the voucher subsidizing the remainder of the rent payment.

The Veterans Affairs Supported Housing program is a cooperative effort between HUD and the Department of Veterans Affairs to provide housings for homeless veterans along with other services and treatment options in order for veterans and their families to gain housing independence along with solving or alleviating any underlying physical or mental issues.

The locations of the various public housing developments (as seen on Map 7) are fairly dispersed throughout the County. However, Tarpon Springs Housing Authority properties, representing only 11% of the total public housing units in Pinellas County, are tightly concentrated in the areas between U.S. Highway 19 and Alternate U.S. Highway 19.

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Map 7: Locations of Public Housing Developments



Tax Exemption Analysis

As of July 15, 2015, Pinellas County Property Appraiser had 39 total or partial exemption categories from property tax.

Of the 39 exemptions, 13 were not currently being utilized. Examples of some of the unused exemption categories are: labor union, education property, agreements with local governments for use of public property, historic property open to the public, space laboratories and carriers, not for profit water and waste water systems corporations. Table 12 indicates the most and least commonly used tax exemptions.

Table 12: Pinellas County Tax Exemptions - July, 2015

Five Most Common Tax Exemptions	Number of Exemptions Claimed
Homestead Exemption - \$25,000	234,417
Additional \$25,000 Homestead Exemption	194,822
Widow's Exemption	24,617
Additional Homestead Exemption 65+	13,799
Disabled Ex-Service Member Exemption	7,181
Five Least Common Tax Exemptions	Number of Exemptions Claimed
Disabled Veterans Confined to a Wheelchair	28
Charter Schools	20
Deployed Serviceman's Homestead Exemption	16
Community Centers	9
Proprietary Continuing Care Facilities	3

Regarding the exemptions related to the protected categories under The Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended, and/or relevant to affordable housing, there were only two protected categories impacted by the exemptions, primarily the disabled, and in much lesser fashion, families with children.

Regarding the disabled, the exemptions helped the disabled either through their status as a disabled veteran of the armed forces, or simply as a disabled person. The exemptions under Florida law that helped the disabled were the following:

§196.081: Exemption for certain permanently and totally disabled veterans and for surviving spouses of veterans; exemption for surviving spouses of first responders who die in the line of duty: Total exemption from property taxes; 2,672 persons qualified for the exemption. No income requirement.

§196.091: Exemption for disabled veterans confined to wheelchairs: Total exemption from property taxes; 28 persons.

§196.101: Exemption for totally and permanently disabled persons: quadriplegic, paraplegic, hemiplegic or other totally and permanently disabled person who used wheelchair or whom was legally blind qualified: Total exemption; 349 persons. Household Income limit of \$27,732.

§196.197: Charitable hospitals, nursing home and homes for special services: Total exemption; 2,025 qualifiers.

§196.1975: Exemption for property used by nonprofit homes for the aged: 148 qualifiers.

§196.1977: Exemption for property used by proprietary continuing care facilities: \$25,000 exemption for each apartment; 3 qualifiers.

§196.202: Property of widows, widowers, blind persons, and persons totally and permanently disabled: \$500 exemption; 495 blind persons, and 5,085 totally and permanently disabled.

§196.24: Exemption for disabled ex-service member or surviving spouse: \$5,000 exemption for veterans disabled 10.0 percent or more during their service; 7,181 persons used the exemption.

For seniors, who would be the largest group to suffer from disabilities, the following exemptions could potentially help:

§196.075: Additional homestead exemption for persons 65 and older: This exemption was expressly for low income seniors. Up to \$50,000 for any person who is 65 years of age, and whose household income does not exceed \$20,000; or (b) The amount of the assessed value of the property for any person who has the legal or equitable title to real estate with a just value less than \$250,000 and has maintained thereon the permanent residence of the owner for at least 25 years, who has attained age 65, and whose household income does not exceed the income limitation of \$28,448 (for 2014); 13,799 used the first of the two exemptions. Zero persons used the 2nd exemption.

§196.095: Exemption for a licensed child care facility operating in an enterprise zone: To a lesser extent, families with children could benefit from this exemption. According to the data, 32 facilities were listed under this exemption (owners had to be a non-profit, among other criteria).

Regarding non-protected categories under The Fair Housing Act, Title VIII of the Civil Rights Act, as amended, that benefit affordable housing would be the following:

§196.1978, Affordable Housing Property. According to the data, 92 facilities benefitted from this exemption.

§196.1995: Economic development ad valorem tax exemption: Called “Parcels granted economic development exemption” on the Pinellas County Assessment Rolls, showed zero persons availing themselves of this exemption.

The largest benefit from the exemptions would come in the form of the above relief provided to the disabled, especially if totally and permanently disabled, or service connected disabilities. This would generate a total exemption from taxes.

Based on the Pinellas County homestead exemptions alone, the estimated savings in real estate taxes can be as much as \$800 annually, which savings represents an increase in purchasing power of up to \$15,000. Overall, it is not believed the exemptions alone would incentivize individuals to purchase a house, however it does reduce the household’s overall housing expense and therefore provides an opportunity to expand their home search based on purchase price. Additionally, the reduction in housing expense provided through tax exemptions offer the disabled and seniors the opportunity to remain in their homes.

Zoning Laws and Policies

Affordable housing barriers can result from well-meaning activities that are not intended to affect the cost of housing, but do. This includes actions such as setback requirements for public safety purposes, landscaping requirements to beautify areas, and density limitations for transportation effects. Several factors exist that impede the development of affordable housing in Pinellas County. Government review processes prolong development timelines resulting in increased per unit housing development costs. Impact fees, charged to defray the cost of constructing and maintaining water, sewer and transportation systems, can increase the costs of single and multifamily developments approximately 4 to 5%. Zoning and Land Use Codes can restrict unit density, impacting the supply of affordable housing. These policies, although enacted to protect general public welfare, hinder the development of affordable housing.

Pinellas County has developed systems for review of local ordinances that may impact affordable housing. The County completes an impact analysis for every land use or code change if the proposed change has any relationship to affordable housing. Often times, the County receives a zoning and/or land use request for an affordable housing project which necessitates an extensive analysis, using the Pinellas County Comprehensive Plan as the basis for the review. Land use and zoning are always controversial items. The governing agency is limiting the action that can be taken by an individual on his property. Finding the line between the best use of the land for the individual and for the community is a very difficult issue. Building codes can affect the cost of housing; but they are, for the most part, out of the local government's hands. The State

government sets the rules for codes; local governments must implement them. The State has increased the cost of housing significantly with various measures over the last few years. New codes for windows, aimed at hurricane wind protection, have increased the cost for those items. New anchoring systems for manufactured housing have caused an increased price in their installation. There is little doubt for the necessity of these actions; however, there is an increase to the cost of housing.

In order to offset these barriers, Pinellas County established an Affordable Housing Incentive Program to provide private sector builders and developers with regulatory and financial incentives to produce affordable housing. Both the Consortium and the City of Largo have affordable housing incentive programs that provide expedited review to affordable housing projects; and offer incentives, such as density bonuses, transfer of development rights, zero-lot line subdivisions, and some reductions in regulations. The County will also waive development fees and reimburse the developer for impact fees paid for affordable housing projects.

Section III: Evaluation of Fair Housing Legal Status

The Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended, is a legislative enactment enforcing a policy of equal access to all types of housing for classes of persons within its protection. To this end, the Act prohibits intentional and unintentional acts of discrimination that impact the groups protected by the Act. The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status and national origin.

The State of Florida and Pinellas County have enacted fair housing laws that are substantially equivalent to the federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended. Both the State (Florida Civil Rights Act (ss. 760.01-760.11) and the Fair Housing Act (ss. 760-20-760.37)), and Pinellas County (Chapter 70, Section 103, of the Pinellas County Code) disallow the same activities prohibited under the federal Act. Pinellas County Code has been amended to include protection to additional classes based on sexual orientation in 2008, and gender identity in 2013.

Since 1992, when the Pinellas County Office of Human Rights (PCOHR) began handling Pinellas County's housing discrimination complaints for the U.S. Department of Housing and Urban Development (HUD), there have been no actions in the County initiated by the U.S. Department of Justice or HUD against a city, company, or corporation within the jurisdiction of which Pinellas County is aware.

PCOHR has actively engaged in providing fair housing education, training, outreach, and awareness initiatives. Staff provides monthly training sessions to PRO, the Pinellas Realtor Organization within Pinellas County, thereby exponentially increasing its reach into the community. Realtors, property managers and housing providers are the first line of defense in preventing or perpetuating discrimination. PCOHR staff also provides updated training on an annual basis, or as requested, to municipal entities, Common Interest Communities, (HOA, Condo Associations) and local private businesses.

The PCOHR employs two Equal Opportunity staff members who are responsible for providing fair housing education/outreach, training and awareness initiatives. The PCOHR is responsible for the intake, investigation and resolution of fair housing complaints to fulfill the HUD requirements for the operation of a "Substantially Equivalent Fair Housing Program". In addition to Pinellas County, this program designation has been earned by only five other counties among Florida's total 67 counties.

It should, be noted that Pinellas County is one of only six "Substantially Equivalent Fair Housing Programs" (Lee County - Broward County - Palm Beach County-Pinellas County- City of Tampa- Orange County-Jacksonville-Florida Commission on Human Relations) among Florida's 67 counties.

Enforcement and Litigation

Between 10/1/2011 and 06/15/2015, Pinellas County processed two hundred nineteen (219) intakes. Between 10/1/2011 and 06/15/2015, Pinellas County processed two hundred thirteen (213) cases to closure. Map 8 shows the location of the type of complaint received, and by year. The statistics show an overwhelming number, one hundred-fifty (150) 68.0 percent of complaints filed based on disability discrimination, of which service animal requests were the majority of complaints. Thirty nine complaints (39) or 17.0 percent were filed based on Race, seventeen (17) or 7.0 percent were filed based on National Origin, fourteen (14) or 6.0 percent were based on Familial Status, twenty three (23) or 10.5 percent were based on Gender and seven (7) or 3.0 percent were filed on the basis of Religion. Complaints can have multiple bases, making the total herein higher than the number of total cases. Regarding the local protection of sexual orientation and gender identity, there were a total of ten (10) complaints filed based on Sexual Orientation, and none on Gender Identity.

Regarding the alleged harms comprising these filings, the denial of a reasonable accommodation was the most commonly cited harm, with one hundred sixteen (116) complaints filed on this basis. The second largest harm was the alleged imposition of different terms and conditions, with one hundred thirteen (113) instances of such allegation. The remainder of the harms, in diminishing order, were as follows: sixty four (64) allegations of harassment, twenty six (26) allegations of a refusal to rent, twenty three (23) allegations of discriminatory advertising, sixteen (16) allegations of a false denial of availability, nine (9) allegations of making housing otherwise unavailable, eight (8) allegations of a refusal to sell, three (3) allegations for steering, three (3) for a denial of a reasonable modification, two (2) allegations of discriminatory financing and one (1) regarding discriminatory zoning.

Regarding harms alleged under the local basis of Sexual Orientation, there were seven (7) allegations of harassment and intimidation, and five (5) allegations regarding the imposition of different terms and conditions.

Please note that complaints can have multiple bases, making the total herein higher than the number of total cases.

Resolution of Complaints

Between 10/1/2011 and 6/15/2015, there were a total of two hundred thirteen (213) cases processed to a conclusion. In this same time frame (10/1/2011 through 6/15/2015), Reasonable Cause was proposed in twenty (20) or 9.0 percent of the cases.

No Reasonable Cause was concluded in one hundred fifteen cases (115) or 53.0 percent, twenty (20) cases were successfully conciliated, fifty eight (58) cases were withdrawn after successful resolutions between the parties, three (3) cases were withdrawn without a settlement, and two (2) were closed as a failure to cooperate.

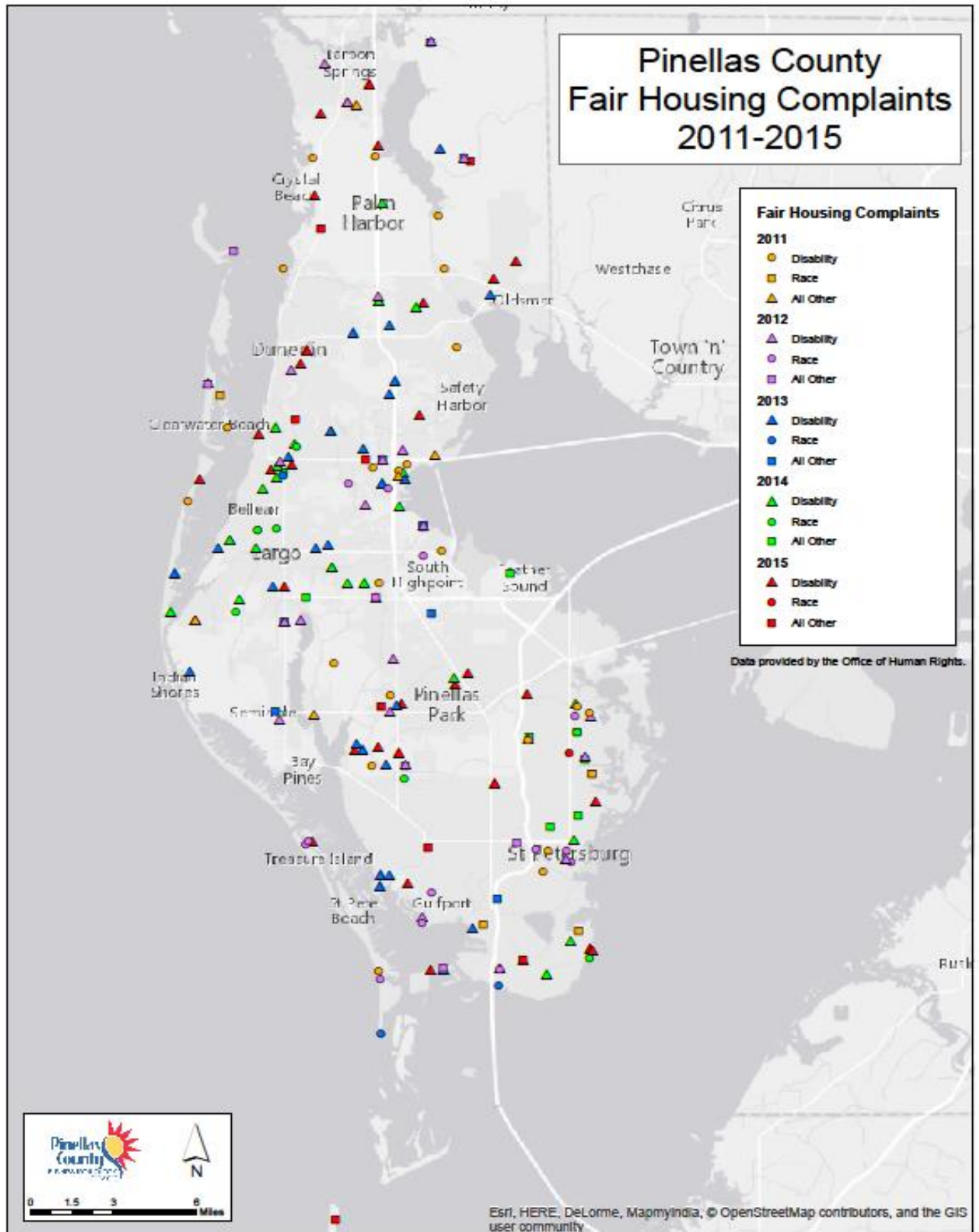
Pinellas County-Tampa MSA Foreclosures

Pinellas County, along with Hillsborough, Pasco, and Hernando Counties, comprise the Tampa-St. Petersburg-Clearwater Florida Metropolitan Statistical Area (Tampa MSA). According to U. S. Department of Housing and Urban Development (HUD), *Spotlight on the Housing Market, January 2012*, distressed mortgages in the Tampa MSA were well above the national average, beginning with a significant rise in delinquencies and defaults among subprime loans in 2007. The Tampa MSA's share of distressed mortgages hit its peak in September 2011 at 16.3 percent, while the nation hit its peak of 7.9 percent in February, 2010. While foreclosures have drastically decreased by 2013-2014, according to CoreLogic's January, 2015 National Foreclosure Report, the State of Florida has the highest percentage of foreclosure inventory at 3.5%, and the Tampa MSA has the highest foreclosure inventory at 4.5% of the Largest Core Based Statistical Areas (CBSAs). Table 13 illustrates foreclosure filings in Pinellas County for the period 2007-2013.

Table 13: Pinellas County Foreclosure Filings

Year	Number of Foreclosures
2006-2007	6,142
2007-2008	12,324
2008-2009	15,164
2009-2010	13,313
2010-2011	5,813
2011-2012	9,506
2012-2013	7,087
2013-2014	3,392

Map 8: Fair Housing Complaints by Type of Complaint, Year and Location



Section IV: Community Outreach and Engagement

As part of the analysis of impediments to fair housing, an effort was made to include the residents of Pinellas County. This was done through public meetings and an online survey. Although the information gathered through both means is limited, it did provide some insights into what residents feel are issues surrounding fair housing.

Two focus group meetings with residents held on October 27, 2015 at the Enoch Davis Center, 111 18th Avenue, South, St. Petersburg, Florida and on November 19, 2015 at Pinellas County Offices, 440 Court Street, Clearwater, Florida. Participants in the focus group meetings included City and County Staff and Public Housing Authorities' personnel for the various jurisdictions, and other government representatives; representatives from local colleges, universities, and the School District; non-profit organizations, home builders, housing and social service agencies representatives; real estate and financial industry representatives; and the general public and other community representatives. Comment forms were available to the attendees in both English, Spanish and Vietnamese versions.

Discussion in the fair housing focus group meetings spanned numerous issues, but the following issues were voiced repeatedly; limited quantities resulting in long wait lists for affordable housing, age of housing stock related to difficulty and expense in retrofitting for senior and disabled population, lack of public awareness of fair housing rights, socio-economic conditions, lack of homebuyer education, predatory lending, credit issues, special needs housing, financial literacy and public transportation.

The second opportunity for public input was through an online survey. This survey was designed to assess: the public's knowledge of fair housing laws; the prevalence of housing discrimination; and the county's community partners' perception of housing discrimination. The survey was designed by county staff and hosted for online participation. Instructions included contact information for those residents who required assistance or further information with participating in the survey.

Despite efforts to promulgate its value to the project and increase desired public input, the participation rate was very low, with only 62 participants. Due to the low participation rate and the sample not being adequately random, a statistical analysis of the survey results would not be representative of the entire population of Pinellas County. However, the responses received were overviewed as case examples as to the status of fair housing law familiarity and housing discrimination issues.

Section V: Impediments to Fair Housing

Actions to Address Previous Found Impediments

Impediments: Impacts of the sub-prime mortgage lending crisis and increased foreclosures. Banking, Finance, Insurance and Other Industry Related Impediments. Low number of loan applications from minorities and low origination rates for minority applications.

Remedial Actions: 1) Continue to work with the State, National Non-Profit Housing Intermediaries, Federal Home Loan Bank, other lenders and HUD to evaluate programs and identify funding that can help reduce the mortgage default rate and foreclosure rates among low and moderate income home buyers and existing home owners; 2) Continue homebuyer outreach and education efforts; and expand homeownership and credit counseling classes as part of the high school curriculum in order to help prevent credit problems; and 3) Encourage financial institutions to continue to assist low to moderate income persons with establishing or reestablishing checking, savings and credit accounts for residents that commonly utilize check cashing services through bank initiated “fresh start programs” for those with poor credit and previous non-compliant bank account practices.

- Pinellas County, Cities of Clearwater, Largo and St. Petersburg provide homebuyer counseling and down payment assistance loans programs, which programs do not permit sub-prime lenders to write mortgages for clients served.
- Cities of Clearwater, Largo and St. Petersburg fund Gulfcoast Legal Services, a non-profit organization, which provides foreclosure counseling and defense.
- From 2011-2013, Pinellas County has provided 269 Foreclosure Prevention Counseling Sessions through Tampa Bay Community Development Corporation and Neighborhood Home Solutions, St. Petersburg, Florida.
- St. Petersburg has an in-house Foreclosure Prevention Program that provides up to \$7,500 in payments to bring a mortgage current on eligible income households in the City limits.
- From 2010-2014, the City of Largo had 222 participants in homebuyer education classes, 130 participants in housing counseling sessions, and 191 participants in fair housing counseling.
- Pinellas County and the Cities of Clearwater, Largo and St. Petersburg participate in the County sponsored yearly HOPE (Homeownership for People Everywhere) Expo, providing workshops (bilingual) and guest speakers addressing renting vs. buying, steps in the home buying process, key players, home affordability, and the prequalification process.
- Pinellas County also funds homeownership counseling (8-hour Homebuyer Education), pre-purchase counseling, post-purchase counseling, and family budgeting through Bright

House Communities Trust, which organization also provides preventative maintenance and housekeeping training; training opportunities are provided in English and Spanish (Mira TV).

- Tampa Bay Community Development Corporation provides both English and Spanish Home Buyer Education classes.
- United Way, Suncoast of Pinellas County offers Financial Coaching and Counseling, including the “Points of Life” program which trained 100 peer counselors for counseling services in low-income areas.
- Representatives from Pinellas County and the Cities of Clearwater, Largo and St. Petersburg attend Fair Housing Training to stay current. The Pinellas County Office of Human Rights hosts training and conference events throughout the year.
- Pinellas County Connection Television’s Radio Show “No Place Like Home”, sponsored by the Housing Finance Authority of Pinellas County, featured an episode with guest presenters from the Pinellas County Office of Human Rights, dedicated to the Fair Housing Act, investigation of violations and information on assistance if issues arise (aired also on YouTube).
- Community Service Foundation, a Pinellas County non-profit, owns and manages affordable rental units and provides seminars for First Time Homebuyer and Financial Fitness Workshops.
- From 2011-2013, Pinellas County has provided 135 Homebuyer Education Classes to 2,576 participants; 31 Budgeting Seminars to 273 participants; 313 individual Housing Counseling sessions; as well as (previously mentioned) 269 Foreclosure Prevention Counseling Sessions. In 2014, City of St. Petersburg provided mortgage classes to 204 persons; family budgeting classes to 4 households; pre-purchase counseling to 38 households; and foreclosure counseling to 246 households. City of Largo provided fair housing counseling service to 263 from 2010 to 2015.
- Cities of Clearwater, Largo and St. Petersburg fund Gulfcoast Legal Services, which organization provides foreclosure defense and counseling (as previously mentioned), and offers elder law services, family law services providing assistance where there has been domestic violence or child abuse, legal aid for paternity actions, child support and custody matters, specialized legal services for education and advocacy on behalf of immigrant children, as well as providing legal services for low income taxpayers who are involved in tax controversies with the Internal Revenue Service.
- Pinellas County 211 hotline is a centralized Social Service Referral Network, which provides resident’s access to non-profits and government agencies who provide assistance with utility shut-offs, temporary housing payments due to sudden job loss.

- Housing Finance Authority of Pinellas County offers affordable rental units, a First Time Home Buyer Program, a Target Home Buyer Program for low income families, as well as Homebuyer Classes.

Impediment: Poverty and low income among minority population.

Remedial Actions: 1) Continue to work on expanding job opportunities through the recruitment of corporations, the provision of incentives for local corporations seeking expansion opportunities, assistance with the preparation of small business loan applications, and other activities. 2) Continue to support agencies that provide workforce development programs and continuing education courses to increase the educational level and job skills of residents.

- Pinellas County School District offers programs to high school students through the Stavros Institute, St. Petersburg, Florida: Enterprise Village and Finance Park. Enterprise Village is a self-contained economic education program that provides a hands-on learning experience for students, spending six weeks in their classroom studying economic education objectives that teach them about writing checks, using a debit card, keeping a checkbook register, applying for a job and working in a group and spending one day onsite in Enterprise Village (similar to a shopping mall) working in one of the 20 businesses, taking breaks, receiving paychecks and having the opportunity to be consumers and making purchases. Finance Park is a reality based, hands-on simulation that enable students to build foundations for making intelligent lifelong personal finance decisions after graduation by simulating an environment where decisions about transportation, investment, home improvement, banking, housing, entertainment, healthcare, utilities, food, home furnishings, clothing and education are being made through budgeting and practice.
- Pinellas County School District High Schools offer classes on financial aid for continuing education, Florida Bright Futures Scholarship Program, Types of Financial Aid, Completion of the Free Application for Federal Student Aid (FAFSA), Understanding the Student Aid Report (SAR), Pinellas Education Foundation Scholarship Catalog, Scholarship Essays, and Scholarship Searches and Scams.
- University of Florida/IFAS Extension provides a site with information about a budgeting worksheet and calendar, homeownership, renting, repairs and keeping the home environment clean, as well as a land use and development including links to Florida Housing Coalition and the National Low Income Housing Coalition.
- Pinellas Opportunity Council provides assistance with small business loan applications as well as an Individual Development Account, providing a 2 to 1 matching savings account to be used for starting a new small business.

Impediment: Limited resources to assist lower income, elderly and indigent homeowners maintain their homes and stabilize neighborhood.

Remedial Actions: 1) Continue to work on expanding job opportunities through the recruitment of corporations, the provision of incentives for local corporations seeking expansion opportunities, assistance with the preparation of small business loan applications, and other activities; and 2) Continue to support agencies that provide workforce development programs and continuing education courses to increase the educational level and job skills of residents.

- Notice for public comment of Pinellas County Consolidated Plan and yearly Action Plan posted in English, Spanish and Vietnamese.
- Catholic Charities, Diocese of St. Petersburg, Inc. in partnership with the Knights of Columbus has broken ground on Pinellas Hope providing temporary housing for homeless men and women with the goal of enhancing quality of life and hasten the clients' return to stable, permanent housing.
- Florida Department of Health, Pinellas County hosted a Healthy Pinellas Consortium Meeting aimed to convene, connect and communicate through partnerships that leverage resources to establish healthy communities and programs. The purpose of the Consortium is to encourage children and adults in Pinellas County to choose active living and nutritious selections for a better future.
- The United Way, Suncoast of Pinellas County, under their Individual Development Account (IDA), in conjunction with Federal grants and private donations, provides a monetary incentive for saving money; for each \$1 that a client saves, the program adds an additional \$2 to the savings account. The average length of time for a client to save \$2,000 is two years, at which point the savings account becomes \$6,000; which must be used to purchase a house, post-secondary school tuition or to start a small business.
- The United Way, Suncoast of Pinellas County, under their "Summer Care" program, provides scholarships for day camps, tutoring and summer bridge books (all programs intended to combat summer learning loss; the parents also agree to attend financial education classes designed to help with practical guidance (how to make it from paycheck to paycheck without running out of money or bouncing checks).
- Kinship Services Network, Programs of the Children's Home, Inc., a non-profit agency offers support to relative caregivers by helping families access needed services, expanding family support systems, and ultimately reducing stress to promote family stability. Support services referrals include public benefits application assistance, counseling/therapy, legal services, access to medical care, mentoring, respite assistance, academic tutoring/support, social/recreational activities, neighborhood support, transportation, vocational support and substance abuse treatment.

- Pinellas County's Bayside Health Clinic located in Clearwater, Florida, funded by grants from the U.S. Department of Health and Human Services and the Health and Resources Administration Pinellas County, provides medical, dental and behavioral health services to the county's homeless population. Many patients come from Safe Harbor shelter run by the Pinellas County Sheriff's Office, allowing the County's mobile medical unit, which makes frequent stops at Safe Harbor, to spend more time elsewhere in the County.
- Pinellas County's Board of County Commissioners unanimously passed a Wage Theft Ordinance, allowing workers to file a claim for unpaid with the County's Office of Human Rights, which office will serve, at no cost to the client, a complaint to the employer and attempt to resolve in mediation.
- In 2016, Pinellas County's Metropolitan Planning Organization joined with Pinellas Planning Council to form Forward Pinellas; as a transportation planning organization and land use planning organization, Forward Pinellas will focus on helping residents and businesses get to and from the places they need to go, and redevelop to support a resilient economy.
- Family Resources is a Pinellas County non-profit providing safe transition for homeless young moms and education through federally funded programs, the Safe2B-You & Me program, and Healthy Marriages & Responsible Fatherhood grants.

Impediment: Limited Resources to assist lower income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.

Remedial Actions: 1) Continue to support and expand programs of self-help initiatives based on volunteers providing housing assistance to designated elderly and indigent property owners and assist them in complying with municipal housing codes; and 2) Continue involvement of volunteers, community and religious organizations/institutions and businesses as a means of supplementing financial resources for housing repair and neighborhood cleanups.

- Pinellas Opportunity Council provides many programs geared towards self-sufficiency: Youth Development program designed to equip low-income, academically talented youth between 14 and 17 years of age with workforce readiness, leadership, entrepreneurial and financial literacy skills; Retired and Senior Volunteer Program providing meaningful opportunities for persons 55 years of age and above to participate more fully in the life of the community through volunteer service matching knowledge and skills with needs; and the Family Development Program which provides case management services, referrals and resource mobilization, education/training, small business start-up, and Youth/Extra Curricular Activity.

- Pinellas County Housing Authority (PCHA) partnered with Boley Centers, ServiceSource, and Blue Sky Communities to provide project-based housing vouchers for the new Duval Park veteran's community in St. Petersburg; Duval Park consists of 88 private apartments for veterans with special needs; 44 of these units will be subsidized through PCHA's Housing Choice Voucher Program.
- Housing Finance Authority of Pinellas County (HFA) received a "Multifamily Excellence Award" for the Pinellas Heights Senior Housing project; the HFA provided \$12,500,000 in bond financing and Pinellas County financed an additional \$1,245,000 from the County's Housing Trust Fund. Pinellas Heights Senior Housing project provides 153 rental units to low and very-low income seniors.
- Pinellas County's Juvenile Welfare Board (JWB), in part funded by Pinellas County, have eight Neighborhood Family Centers throughout Pinellas County, and provide families with the resources, support and skills necessary to raise their children in a healthy and safe community that promotes development of their maximum potential. The JWB invests in partnerships, innovation and advocacy to strengthen Pinellas County children and families offering key strategy focus areas: school readiness, school success and prevention of child abuse and neglect.
- Pinellas County funded a project at Girls, Inc. in Pinellas Park that included STEM lab space for girls with corporate support from TechData in order to educate and expand economic opportunities for youth and their families.
- In 2013, Pinellas County's Dansville and Greater Ridgcrest Area Housing Development Plan consists of transforming 31 acres of property and the surrounding Dansville neighborhood into a mixed-income community and assist over 100 residents purchase homes.
- Pinellas County Code Enforcement started exploration of potential actions to enhance code enforcement efforts and realize efficiencies in service delivery for the unincorporated areas of the county; by increasing code enforcement activity, blighted communities can be revitalized.
- City of Largo has 1) funded Pinellas Opportunity Council's Chore Services for two years; 2) operates an owner-occupied housing rehabilitation program to assist low-income households with funding and contractor management to make necessary improvements to their homes, as well as funding for lead-based paint removal and accessibility improvements (ramps, grab bars); and 3) facilitated two neighborhood clean-up days in two of the City's low income neighborhoods, providing free dumpsters for disposal of large items, free trees and planting services, and the Red Cross installed free smoke-detectors in homes

- City of Largo and partnering agencies purchase properties through voluntary acquisition that are vacant and in blighted neighborhoods and are either rehabilitated or replaced, and sold to low and moderate income families.

Revitalization Areas in Pinellas County

In 1969, the Florida Legislature enacted the “Community Redevelopment Act of 1969” (Chapter 69-305). The Act is the enabling legislation that allows for the creation of community redevelopment agencies and Community Redevelopment Areas within the State of Florida. The Act provides the option of establishing a redevelopment trust fund that may receive funds through the allocation of tax increment revenues.

In addition to the aforementioned accomplishments, there have been twenty two (22) Community Redevelopment Areas (CRAs) created in Pinellas County since 1977. Of the 22 CRAs created, three have expired (Jamestown, Central Plaza, Tarpon Springs North Community) and two have not adopted a Community Redevelopment Plan (Belleair Belleview Biltmore Hotel and St. Pete Beach Gulf Boulevard/Downtown).

Out of the 17 current CRAs that have adopted a Community Redevelopment Plan, five have not established a redevelopment trust fund (Clearwater-Largo Road, 16th Street South, Dome Industrial Park Pilot Project, Dome Industrial Park and Tangerine Avenue).

Since Pinellas is a County with a home rule charter, the powers conferred by the Act are the responsibility of the Board of County Commissioners (BCC). The BCC, however, has the discretion to delegate some or all of these redevelopment powers to the governing body of a municipality. CRAs have been established in eleven municipalities, with three cities (St. Petersburg, Gulfport and Largo) having two or more redevelopment areas. Most of the CRAs include the municipality’s historic downtown area, which helps account for their distribution throughout the County from Tarpon Springs in the north to Gulfport in the south.

Not all of the CRAs within Pinellas County receive tax increment revenue; out of the 12 CRAs that have adopted a Community Redevelopment Plan and have established a redevelopment trust fund, 11 have been authorized to receive County TIF contributions.

Gulfport’s 49th Street Corridor is the only CRA that has adopted a Plan and established a trust fund but does not receive County TIF contributions.

Starting in 2002, the new CRA Plan included a requirement that the County conduct a review of the CRA’s use of County TIF contributions halfway through the duration of the redevelopment

trust fund. Based upon this comprehensive review, the BCC determines whether the County's TIF contribution should be adjusted for the remaining years of the trust fund.

The use of tax increment financing (TIF) involves three fundamental components: the current total taxable assessed value within a CRA, the total taxable assessed value at the time the redevelopment trust fund was established (the base year), and the applicable County millage rate.

As the taxable assessed property value within the CRA increases above the value of the base year (i.e. the "increment"), the property taxes generated by the increment are allocated to the applicable redevelopment trust fund and must be spent on projects within the CRA that implement the adopted community redevelopment plan. Since 1996/97, TIF contributions from Pinellas County steadily increased until 2009/10, when the dampening effect of the recession reduced TIF revenues from the previous year's highpoint of \$8.7 million contributed in 2008/09. Overall, since the early 1980s, Pinellas County has invested over \$83.8 million dollars in the 11 CRAs that receive TIF revenues.

In the case of the St. Petersburg Intown CRA, Pinellas County has invested \$46.7 million since 1986. The municipality within which each of these 11 CRAs is located also contributes TIF dollars to the applicable CRA redevelopment trust fund. Six of the 11 CRAs that receive County TIF contributions are at least halfway through the duration of their redevelopment trust funds.

Individual CRA Summaries:

1. **BELLEAIR BELLEVIEW BILTMORE HOTEL:** The Town of Belleair was delegated redevelopment authority by the BCC in June 2012 for the Belleview Biltmore Hotel property. The Community Redevelopment Area encompasses the Belleview Biltmore Hotel property, including a spa and fitness building, three cottages, and the immediate grounds, parking and tennis court areas. The purpose of the delegation was to assist the Town in restoring the Belleview Biltmore Hotel by using the redevelopment tools from the Florida Community Redevelopment Act (Chapter 163, Part III, Florida Statutes) to help address deteriorated physical conditions and economic distress of the Belleview Biltmore Hotel site. In July 2012, the Town Manager informed the County that the developer of the Belleview Biltmore Hotel was no longer interested in pursuing a Community Development Plan.
2. **CLEARWATER DOWNTOWN:** The City of Clearwater's Downtown CRA is the second largest, as well as one of the oldest, CRAs to be created in Pinellas County, totaling 488 acres in size. In 1981, following the BCC's delegation of redevelopment authority, the original Community Redevelopment Plan for the Downtown area was approved.

Subsequently, in October of 1982, a Redevelopment Trust Fund was established by the BCC, allowing for the contribution of tax increment revenues from the County's ad valorem taxes. In 2003, the City reassessed the original downtown CRA boundaries and established the need for revitalization outside the original downtown core. As a result, the BCC approved expansion of the boundaries of the CRA eastward to pick up the Gateway Area, thereby adding almost 202 acres.

In 2004, the BCC authorized the 14 contribution of tax increment revenues from the County's ad valorem taxes for the Gateway Expansion Area, and authorized an extension to the County's TIF contribution to the original Downtown area for another 30 years.

The main objectives included in the Plan are to improve the City's downtown economy by leveraging public-private partnerships and creating residential and commercial stability, and to provide for the stabilization of commercial buildings and residential neighborhoods to support the local economy. Since approval of the 2003 Plan, the BCC has approved three amendments, in 2005, 2009 and 2010.

In 2005, the amendments clarified that the transfer of development rights must be consistent with Countywide Rules, added adult uses to the list of prohibited uses within the Downtown Core character district, reduced the maximum density standard for hotel uses in the East Gateway character district from 70 units per acre to 4 units per acre and incorporated Downtown Design Guidelines. The 2009 amendments minimally affected the goals, objectives, and policies of the Downtown Strategies, and also revised the County and City tax increment revenue projections in the Plan. The 2010 amendments created a new policy regarding the potential outdoor display of bicycles for retail bicycle establishments along the Pinellas Trail within the Downtown and expanded the variety of permissible uses for parcels in the vicinity of the Clearwater Gas property. In 2010/2011, the City approved an agreement with Ruth Eckerd Hall to expand the theatres schedule of programming until the planned facility renovations begin. On Sept. 7, 2010, the CRA approved the purchase of real property comprising the bulk of the East Gateway block bounded by 15 Cleveland Street, North Betty Lane, Grove Street and North Lincoln Avenue. The parcels include the Economy Inn Motel; former Royal Palm Motel; Viva Mexico restaurant; two duplexes; and one single family residence for a total of 2.2 acres. Also, the City provided a \$700,000 loan, for the purchase of the Country Club Townhomes to construct a 31-unit townhouse project located at Drew Street and North Betty Lane. This multi-family housing project is intended to increase the supply of owner-occupied, workforce-housing units in the East Gateway District property.

3. **DUNEDIN DOWNTOWN:** The City of Dunedin's Downtown CRA is 154 acres in size and was established by the BCC in 1988. The CRA has one Redevelopment Trust Fund, which receives both City and County TIF contributions.

Since the establishment of the CRA, the City's downtown has seen numerous changes over the years, and today is a vibrant pedestrian area, readily accessible to the Pinellas Trail, offering boutique retail shops, quaint art galleries, specialty antique stores, and a variety of casual to fine dining restaurants.

The Downtown Redevelopment Plan was approved by the BCC in 1988 and provides direction to the revitalization of the area. Approximately 90.0 percent of the improvements identified in this Plan have been completed, including streetscaping, traffic calming, entryway monuments, underground utility lines, public parking, decorative lighting and many other elements designed to lend the area a sense of place.

In 2012, the City updated its Redevelopment Plan in order to meet future challenges. The updated Redevelopment Plan outlined 10 primary goals and major strategies and capital investments in streets, recreation, utilities, parking, planning and design, signage, and marketing. The goals of the updated Plan are: 1) Maintain and expand financing mechanisms such as matching grants, tax increment financing and the Penny for Pinellas; 2) Maintain "coastal small town" character through revising codes to be commensurate with scale; 3) Leverage waterfront as an asset with better connectivity with downtown core; 4) Capitalize on strategic vacant parcels to foster economic development with a strategy for appropriate land acquisition; 5) Enhance walkability and public spaces with emphasis on pedestrian safety, increased shade, and way finding; 6) Improve transportation and parking to support future development; 7) Continue to offer downtown redevelopment assistance, such as signage and a "parking bank"; 8) Expand marketing efforts through a branding strategy, marketing materials and business focus groups; 9) Continue to make downtown as a destination with community events, the arts, and historical heritage; and 10) Contribute to the City's Green Initiative through promotion of green building and green business practices.

Recently, the City improved the former Keller Sales & Engineering buildings into an 84-space public parking lot; Completed a streetscape enhancement project at the intersection with pedestrian crossings, landscaping, brick sidewalks, underground utilities, realign curb/street lines, and a decorative fountain; and Pedestrian and recreational enhancements were completed to an area near the intersection of the Pinellas Trail and Main Street.

4. **GULFPORT WATERFRONT DISTRICT:** The City of Gulfport's Waterfront CRA is the smallest CRA currently receiving County TIF contributions, totaling 84 acres. The CRA boundaries, which have not changed since its establishment, were originally based on the following main factors: creating a redevelopment area of a manageable size, concentrating commercial activity along Beach and Shore Boulevards, and the inclusion of historic residential and nonresidential areas. A Redevelopment Trust Fund was approved in 1993 by the BCC and currently receives both City and County TIF contributions.

The Waterfront District Redevelopment Plan was adopted in 1993 by the BCC and was created for the purpose of conservation, rehabilitation, and revitalization of the Waterfront area. The Plan establishes general project objectives for the rehabilitation and revitalization of the historic commercial and residential corridors. Since adoption of the Plan, the BCC approved two amendments (in 2000 and in 2009). The 2000 amendment modified the City's Future Land Use Map within the Plan to facilitate the construction of Veteran's Park. In 2009, amendments were made to provide incentives that support small-scale mixed-use development and assist with the creation of a live-work concept. Recently, the City was able to add several new pieces of artwork to the Waterfront Redevelopment Area, including an entryway sign on Gulfport Boulevard and rehabilitation work on the pavilions located along Shore Boulevard.

5. **GULFPORT 49TH STREET CORRIDOR:** On November 23, 1999, the City was delegated redevelopment authority by County Resolution 99-246. This Resolution prohibited Gulfport from seeking the use of tax increment financing, and prevented the City from establishing a Redevelopment Trust Fund. On October 31, 2000, the BCC clarified the intent of Resolution 99-246 by adopting Ordinance 00-86, which approved the creation of a Redevelopment Trust Fund for the CRA. County Ordinance 00-86 does not allow the use of tax increments to provide revenues for the Trust Fund, but does allow the City to allocate other 25 revenue sources to the Trust Fund.

The CRA boundaries have not changed since its establishment and were originally influenced by conditions such as deteriorated structures, poor maintenance of commercial and residential properties, inadequate sidewalks and roadway curbing, and high crime rates.

The purpose of this Plan is to stabilize, revitalize and enhance property values within the 49th Street CRA boundary by adopting a definitive action plan containing specific projects and programs, many of which have already been completed. The principal objectives of the Plan are to: Promote mixed uses as part of a "Live-Work" and "Mixed-Use"

arrangement; Provide added flexibility for property owners with regard to the types of uses permitted; Eliminate unsightly activities and uses; Better control outdoor sales and display; Attract working professionals and home-based businesses; and Preserve and enhance residential neighborhoods and the overall residential character of the area. Since approval of the Plan, there was one amendment in 2009, which created overlays that added flexibility and incentives to support small-scale mixed-use development and to assist with the creation of a live-work concept.

Recently, the City completed the Tangerine Parkway project, which was constructed with transportation improvement grant funds provided by the Florida Department of Transportation.

6. **LARGO WEST BAY DRIVE:** The City of Largo's West Bay Drive CRA is approximately 445 acres in size and received delegation of redevelopment authority from the BCC in 1991. In 2002, the City received BCC approval to expand the CRA boundary to the east.

A Redevelopment Trust Fund was approved in 2000 by the BCC and currently receives both City and County TIF contributions. The Redevelopment Plan was originally approved in 1997 by the BCC. A new Plan was approved in 2010, but did not include the expansion area to the east due to property owner opposition. The goals and objectives of the recently approved Plan specifically relate to mobility and pedestrian improvements/enhancements to facilitate transformation of the area from an automobile-dependent commercial corridor to a vibrant, mixed-use, walkable area.

Recently, the City of Largo undertook the following: The reconstruction of 4th Street SW from West Bay Drive to 8th Avenue SW was completed. The reconstruction included re-bricking of the street, new curb, and an urban sidewalk installed on both sides of the street. New retail and office establishments opened in the District such as Keller Williams Realty, Deuces Restaurant, and Dr. Mahajan's Medical office complex. The City started a new Capital Improvement Project that will enhance an area adjacent to the Pinellas Trail within the West Bay Drive District, which will connect many downtown businesses to the trail.

7. **LARGO/CLEARWATER-LARGO ROAD:** The 306 acre Clearwater-Largo Road CRA was established in 1995 and includes commercial properties along the Clearwater-Largo Road corridor and the adjacent residential neighborhoods. The original boundaries of this area have been expanded twice, once in 2002 and again in 2008. The latter expansion includes

recently annexed properties. A Redevelopment Trust Fund has not been established for this CRA.

The initial Clearwater-Largo Road CRA Redevelopment Plan was approved by the BCC in 1996. In 2006, the BCC approved a new Plan for the CRA that included the expanded area and addressed affordable housing initiatives and a mobile home park transition program for displaced residents. In 2008, the Plan was amended to incorporate annexed properties. The main intent of the Redevelopment Plan is to transform the Clearwater-Largo Road Corridor into a vibrant mixed-use area.

The Plan focuses on four main implementation programs: streetscaping and pedestrian orientated development, business development, strengthening neighborhoods, and providing flexible regulations to permit mixed-use development.

Recently, a new Capital Improvement Project has been dedicated to resolve storm water run-off related issues within the District. The Bayside Court Apartment complex has been constructed, which has added 244 workforce housing units to the District.

8. **OLDSMAR TOWN CENTER:** The City of Oldsmar's CRA was established in 1993 and originally encompassed an area generally south of the intersection of State Road 580 and Tampa Road. This area was expanded in 1995 to include land wedged between SR584/Tampa Road and SR 580, as well as portions of land east of St. Petersburg Drive. Currently, the CRA is approximately 106 acres in size.

The CRA has one Redevelopment Trust Fund account, which receives both City and County TIF contributions. In 1996, the Oldsmar Town Center Plan was approved by the BCC. The Plan includes an overall vision for the CRA in 2015, and identifies goals that emphasize the importance of maintaining Oldsmar's small town character and unique appeal. In addition, the Plan focuses on infrastructure improvements, traffic calming, on-street parking, streetscaping, and street signage.

Recently, the City completed renovations to the Oldsmar Bank building, which now houses the City Council Chambers, the Upper Tampa Bay Chamber of Commerce, the Historical Society, and an office for the Pinellas County Sheriff. Completion of streetscaping along St. Petersburg Drive, which includes 40 new on street diagonal parking spaces, sidewalks and crosswalks, LED Victorian style street lights and two designated electric car charging stations. There are currently six electric car charging stations in the CRA.

9. **PINELLAS PARK DOWNTOWN:** The City of Pinellas Park's Downtown CRA, at 1,339 acres, is the largest CRA in Pinellas County. The boundaries generally extend along the Park Boulevard corridor, bounded by 34th Street to the east and 67th Street to the west, between 78th Avenue to the north and 70th Avenue to the south, and north and south along the 49th Street corridor (see Figure 9). The CRA's Redevelopment Trust Fund was created in 1990, and receives both City and County TIF contributions.

The Downtown Redevelopment Plan was approved in 1990 by the BCC. Overall, the Plan establishes goals and objectives to eliminate blighted conditions, maximize location advantages, promote new investment and re-investment in properties and create a strong, vibrant downtown area. In 1994, the Plan was amended to address density bonus incentives to encourage larger scale development, as well as to revise relocation procedures for displaced residents to correspond with the County's minimum relocation guidelines adopted in 1993. The Plan was subsequently amended in 1997 to update references to the City's Land Development Code and to enable the transfer of development rights within the CRA boundaries.

Recently, the City stated that 135 new businesses were established within the CRA; The City completed construction of a new "green" parking lot at the Performing Arts Center; The City completed construction of a storm water pond at 46th St. & Park Blvd; A cooperative revitalization project is underway between the CRA and United Cottages Corporation (a subdivision of cottages located on 75th Terrace). The area began as a trailer-converted tourist development in the 1940's, and was rezoned in 2011 as a mixed-use district with the hope that businesses might invest in a downtown, "live-work" location. So far the CRA has invested over \$1,000,000 in the neighborhood and has initiated projects that include the replacement of existing utility poles with underground electric utility infrastructure; drainage improvements; street upgrades (brick pavers, curbs, and gutters); new driveways; uniform street address signage for each lot; a mail kiosk; and decorative street lighting.

10. **SAFETY HARBOR DOWNTOWN:** The City of Safety Harbor was given redevelopment authority by the BCC in 1992 to address deteriorating conditions in the downtown area. The original CRA boundary generally extended from Old Tampa Bay to 11th Avenue (east to west) and from 3rd Street North to 3rd Street South (north to south). In November of 2004, the BCC approved an expansion of the original area to include redevelopment activities within three adjacent areas.

A Redevelopment Trust Fund was approved in 1992 by the BCC and currently receives both City and County TIF contributions. However, the County TIF contribution is only applicable for properties located in the original CRA. As of yet, the City has not elected to pursue the establishment of a separate Redevelopment Trust Fund for the expanded area.

In March 2009, the BCC approved a new CRA Downtown Master Plan, which included both the original CRA and the expansion area. The 2009 Downtown Master Plan follows the direction and practices contained in the Pinellas County Metropolitan Planning Organization's Livable Communities Model Code. The Plan stresses the importance of creating a sense of place and strives to preserve the nearby historic neo-traditional residential neighborhoods. The new Plan was subsequently amended in 2012 to update references to the City's Comprehensive Plan and Land Development Code. Also there were amendments made to the Tax Increment Financing section, reflecting new revenue projections that account for the downturn in property values.

Recently, the City completed the construction of 42 new parking spaces along 2nd Street South and also reconfigured and improved 14 on-street parking spaces along North Bayshore Boulevard; Completed the Jefferson Street sidewalk improvements; Installed six new bicycle racks and purchased seasonal welcome banners that will be hung from the light poles throughout the downtown; Completed dock and boat slip improvements to the City-Owned Marina Park; and funded and preformed a variety of environmental restoration activities inside the recently acquired greenway and trail easement along Mullet Creek.

11. **ST. PETE BEACH GULF BOULEVARD & DOWNTOWN:** The City of St. Pete Beach was delegated redevelopment authority by the BCC in October 2006 for the 135 acre St. Pete Beach CRA. A Redevelopment Trust Fund has not been established for this CRA. In March 2010, a Redevelopment Plan was approved by a citizen referendum.
12. **ST. PETERSBURG 16TH STREET SOUTH:** The 16th Street South CRA is a narrow (roughly one-block wide) 22 acre corridor straddling 16th Street South, between 14th Avenue South and north of 19th Avenue South. A Redevelopment Trust Fund has not been established for this CRA.

The foremost goal of the Redevelopment Plan is to improve the economic viability of businesses along the corridor by creating a retail commercial business district. Business development goals concentrate on expanding the market potential of existing small

businesses and creating a broader mix of commercial activity, especially those involving both specialty and convenience retail. Some design related goals involve upgrading the physical environment through façade enhancement and landscaping, drainage and traffic circulation improvements. The Plan also calls for creating a “healthy” pedestrian experience to serve its residents and visitors.

Recently, in 2011, the City did not expend or program funds for capital improvements for this redevelopment area. The City issued twelve building permits, totaling \$278,000 in construction value.

13. **ST. PETERSBURG BAYBORO HARBOR:** The 193 acre Bayboro Harbor CRA was established by the BCC in 1985. The CRA has one Redevelopment Trust Fund, approved by the BCC in 1988, which receives both City and County TIF contributions. The majority of the Bayboro Harbor CRA is characterized by institutional/non-profit organizations such as the National Oceanic and Atmospheric Administration (NOAA), Florida Marine Research Institute (FMRI), Florida Wildlife Commission (FWC), the United States Geological Survey Institute, All Children's Hospital, Bayfront Medical Center, and the University of South Florida-St. Petersburg. All of these large organizations are exempt from paying property taxes and occupy much of the CRA land on its northern and western boundaries, which explains why TIF revenues have not increased significantly in recent years, in comparison with other CRAs within the City. Continued expansion of these tax-exempt institutional uses has constrained the generation of TIF revenues within the CRA.

The City acquired a 15 52 acre parcel of land that was conveyed to USF-St. Petersburg to expand its student housing. Additionally, All Children's Hospital and the Bayfront Hospital Medical Center have expanded their facilities between 4th Street South and the CRA's western boundaries, removing additional properties from the tax rolls. Even though these tax-exempt organizations do not contribute to the TIF revenues in the CRA, they provide a large amount of employment opportunities, which is beneficial to the City of St. Petersburg and Pinellas County.

The Bayboro Harbor Redevelopment Plan was approved in 1985 by the BCC and focuses on the expansion of educational and health care facilities, residential development, expansion of the Waterfront Park System and reinforcing Salt Creek as a marine industry service center. Since its original approval, the Plan has been amended twice, in 2008 and in 2009. Both amendments were minor, modifying several public improvement projects to add public access to the waterfront and transportation improvements/amenities to the Plan.

Recently, in 2011, the City issued 21 building permits totaling \$350,000 in construction value. However, most of the permits were for roofing or mechanical work.

14. **ST. PETERSBURG INTOWN:** The City of St. Petersburg's Intown CRA is the third largest, as well as one of the oldest (tying with the City of Clearwater) CRAs to be created in Pinellas County. The City was delegated redevelopment authority for the CRA from the BCC in 1981.

In 1982 the BCC established a Redevelopment Trust Fund for the area and authorized the allocation of County TIF revenues. In 1986, the BCC approved an ordinance to revise the County's TIF contribution date to January 1st of each taxable year, instead of October 1st of the fiscal year. In 2005, the BCC approved an extension of the County TIF contribution for another 30 years primarily to help fund major improvements such as the new Mahaffey Theater and Pier renovations. Compared to any other CRA within the County, the Intown CRA annually receives the largest amount of County TIF revenues, largely attributed to the recent 55 significant development activity in the area.

The Intown Redevelopment Plan was approved by the BCC in 1981. Overall, the Plan emphasizes development of a retail core, supporting residential areas as well as the stadium district. Since its original approval, the Plan has been amended three times. In 2005, a revised list of public improvement projects was added, and in 2006, an amendment increased the maximum amount of TIF funds available for downtown improvement projects from \$95.4 million to \$97.4 million and allowed the Florida Orchestra to utilize a \$2 million private donation to construct their headquarters. In 2008, minor amendments were made to the Plan consisting of updating text, maps, related graphics, and correcting outdated zoning and future land use references (to ensure consistency with recent amendments to the City's Future Land Use Element of their Comprehensive Plan). In November 2010, the BCC amended the Interlocal Agreement for the Intown Redevelopment Area to reallocate \$2.5 million from Pedestrian System/Streetscape Improvements to help fund public site improvements for the Dali Museum. This amendment to the Interlocal Agreement subsequently required a corresponding amendment to the Intown Redevelopment Plan that was completed in July 2011.

Recently, in 2011, the City issued 264 building permits in the Intown CRA, totaling more than \$7.9 million in construction value. All of the projects involved renovations to condominiums or commercial and government establishments.

The Development Review Commission and Community Redevelopment Agency approved one project in Intown, a 10,000-SF rooftop addition to the Birchwood Inn (formerly known as Grayl's Hotel). Also, the City has initiated plans to relocate its downtown PSTA transit hub at Williams Park to a new transportation facility, and is considering several locations that would support the future trolley and BRT transit plans. In addition, the City has started on a multi-tiered program focused on transit service improvements along the Central Avenue corridor and to nearby areas located west of the downtown. Lastly, on November 8, 2011, St. Petersburg voters approved an amendment to the City Charter requiring City Council to develop and approve an inclusive Downtown Waterfront Master Plan by July 1, 2015. The Master Plan will guide the development not only of the City's waterfront park system but also other major facilities including the Municipal Port, Albert Whitted Airport, Al Lang Field, the Progress Energy Center for the Arts, and the Municipal Marina.

15. **ST. PETERSBURG INTOWN WEST:** The Intown West CRA is approximately 123 acres in size and lies north and west of Tropicana Field, bounded by I-275 to the west and I-175 to the south, and Martin Luther King Boulevard to the east.

The CRA was created to capitalize on the development of Tropicana Field and the eventual awarding of a Major League Baseball franchise. In 1991, the BCC established a Redevelopment Trust Fund for the area and authorized the allocation of County TIF revenues.

The Intown West Redevelopment Plan was approved by the BCC in 1990. Overall, the Plan attempts to address building deterioration, poor visual identity and the lack of a unified architectural theme surrounding Tropicana Field. Since its original adoption, two amendments have occurred. In 2008, the amendments consisted of updating text, maps and related graphics. In 2009, the amendments modified the list of public improvement projects and corrected outdated zoning and future land use 58 references to ensure consistency with recent amendments to the City's Future Land Use Element of their Comprehensive Plan.

Recently, during 2011, the City issued 40 building permits totaling more than \$550,000 in the Intown West district. Also, two new residential projects, that were permitted in earlier years, opened – Bob Pitts Villas (1007 Arlington Ave N) and Fusion 1560 (1560 Central Ave). Also, City staff approved a site plan for a 12-story, 64-dwelling unit development at 1325 Arlington Avenue North and the Development Review Commission approved an 11-story, 70-unit apartment complex at 1050 1st Avenue North. However, neither development has applied for building permits.

16. **ST. PETERSBURG DOME INDUSTRIAL PARK PILOT PROJECT:** The Dome Industrial Park Pilot Project Redevelopment Area is located in the area known as Midtown. It is bounded by I-275 on its east and southeast, 22nd Street South on its west, and 5th Avenue South to its north.

This CRA was established in 2000 to energize investment in the neighboring Dome Industrial Park CRA (the City's first brownfield site). A Redevelopment Trust Fund has not been established for this CRA.

The Redevelopment Plan for this CRA was approved by the BCC in 2000 and was designed to encourage redevelopment activity that generates additional investment and jobs in the Pilot Project area. Major components of the Plan include land assembly, relocation of displaced residents, demolition of structures, and infrastructure upgrades necessary to eliminate the blight conditions. Since the adoption in the Plan in 2000, two amendments have been approved by the BCC. In 2005, amendments were made to support the proposed location of the Job Corps facility. In 2008, the amendments consisted of updating City Council and 61 BCC dates/actions, text, maps, related graphics, and changes to outdated future land use and zoning references.

Recently, there has not been any recent development activity in association with the CRA.

17. **ST. PETERSBURG DOME INDUSTRIAL PARK:** The BCC delegated redevelopment authority to the Dome Industrial Park CRA in 2005. The CRA totals 158 acres and borders both I-275 and 34th Street South. In 2006, the BCC approved an amendment to reduce the original size of the CRA based upon the City's revised Slum and Blight Study. A Redevelopment Trust Fund has not been established for this CRA.

The three main objectives of the Plan are business retention, expansion and recruitment. The overall implementation of the Plan centers on land assembly, infrastructure improvements, transportation improvements, and business assistance programs. In 2008, the Plan was amended, although amendments were minor in nature and consisted of updating text, maps, related graphics, and correcting outdated zoning and future land use references to ensure consistency with recent amendments to the City's Future Land Use Element of their Comprehensive Plan.

Recently, in 2011, the City acquired six properties for approximately \$500,000 funded by a U.S. Housing and Urban Development Economic Development Initiative grant, which

implements the City's objective to consolidate land for future redevelopment in the southeastern quadrant of the CRA. Also during 2011, the City issued 33 building permits in the DIP for a total value of \$471,254, approximately \$220,000 for renovations to the building of a paving business located at 800 31st Street South. The remaining permits were associated with demolition, roofing, mechanical or electrical work or interior renovations to existing buildings.

18. **ST. PETERSBURG TANGERINE AVENUE:** The Tangerine Avenue CRA is a part of a larger Midtown Strategic Planning Initiative to guide future neighborhood and economic development improvements to the area. The Tangerine Avenue CRA is located at the intersection of Tangerine Avenue (18th Avenue South) and 22nd Street South, encompassing the northeast, southeast and southwest corners of the intersection.

The City of St. Petersburg was delegated redevelopment authority by the BCC in May 2003 for the 21 acre area. A Redevelopment Trust Fund has not been established for this CRA. The primary goal of the Redevelopment Plan was to promote commercial development on the north and south sides of 18th Avenue South, and to strengthen the surrounding single-family residential area. Since the original approval of the Plan by the BCC in 2003, there has been one amendment. In 2008, the amendments consisted of updating text, maps, related graphics, and correcting outdated zoning and future land use references to coincide with recent amendments to the City's Future Land Use Element.

Recently, in 2011, the City issued seven building permits for work totaling \$571,000. Nearly all of the permit activity involved construction of the Dollar General at the southwest corner of the intersection of 18th Avenue South and 22nd Street South. In 2013, the SweetBay Supermarket at the Tangerine Plaza went out of business and closed its doors. The closure does not necessarily mean that the supermarket was underperforming, but was one of at least three other SweetBay Supermarkets that were closed in the City of St. Petersburg.

19. **ST. PETERSBURG, SOUTHSIDE CRA:** A Plan was developed and approved in the fall of 2015 which incorporates the majority of the south side of St. Petersburg. The plan focuses on substantial redevelopment, including housing improvements and economic development.
20. **TARPON SPRINGS DOWNTOWN:** The City of Tarpon Springs was given redevelopment authority by the BCC in 2001 to address deteriorating conditions in the downtown area. This area is approximately 226 acres in size and is comprised of commercial properties within the Alternate US Highway 19 corridor and the adjacent residential neighborhoods,

which are south of the Anclote River and north of Meres Boulevard. In June of 2003, the BCC approved the City's request to expand the original area by 1.4 acres to include the former Pappas Restaurant property. A Redevelopment Trust Fund was established by the BCC in 2001, and receives both City and County TIF contributions.

The overall focus of the Tarpon Springs' Downtown Redevelopment Plan is to bring economic growth to the district through tourism enhancements. The Plan attempts to improve the visitor experience through improved visual gateways, unified themes, and transportation and pedestrian improvements. Since approval of the Redevelopment Plan by the BCC in 2001, there has been one amendment. In 2006, the amendment consisted of updating text, maps, and related graphics, and zoning and future land use references that relate to the 2003 CRA expansion to include the former Pappas Restaurant property. Recently, the City has completed the improvements and received a federal earmark in the amount of \$385,000 for infrastructure improvements on Lemon Street. The CRA additionally funded \$500,000 for streetscape/landscaping improvements for the Lemon Street Corridor. In August 2011, the City acquired Tarpon Avenue from FDOT. This transfer would allow for more creative use of the rights-of-way and allow the City to enhance cyclists and pedestrian activity. The Board of Commissioners recently approved a re-planting plan for the existing medians, bulb-outs and tree wells. The City has approved concept plans for two recreation areas along Live Oak Street. The North Parcel is the city-owned parking lot / dog park area located between Live Oak Street and the Anclote River. The City has budgeted \$285,000 from Penny for Pinellas funds for this project.

Community Reinvestment Act

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by federal regulations in 12 CFR parts 25, 228, 345, and 563e, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound banking operations.

The CRA requires that each insured depository institution's track record of meeting the credit needs of its entire community be evaluated periodically and taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions. CRA examinations are conducted by the federal agencies that are responsible for supervising depository institutions: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC).

For the period 2007-2015, all financial institutions in Pinellas County governed by the FDIC, FRB and OCC were rated either Outstanding or Satisfactory, with no Needs Improvement or Substantial Non-Complaint. (Source: <http://www2.fdic.gov/crapes/>)

Home Mortgage Disclosure Act (HMDA) Analysis

Introduction

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public with loan data that can be used to assist in determining whether financial institutions are serving the housing needs of their communities, public officials in distributing public-sector investments so as to attract private investment to areas where it is needed, and in identifying possible discriminatory lending patterns. This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions.

The Federal Financial Institution Examination Council (FFIEC) gathers data on home mortgage activity from the federal agencies that regulate the home mortgage industry. Data for years 2007 through 2013 was downloaded from the Consumer Financial Protection Bureau (<http://www.consumerfinance.gov/hmda/>) for analysis. This analysis (the data deemed most pertinent to this report) is limited to loan denial and origination rates by census tract within Pinellas County and within areas of racial, ethnic and income distinction for loans for 1-4 family dwellings and manufactured homes, but excluding data on loan applications for investment

purposes (non-owner occupied). Three types of loan products were included: conventional, FHA and VA loans; and three loan purposes were included: home purchase, refinance, and home improvement loans.

Analysis

Results displayed in Table 13, and illustrated in Charts 11-15, shows a summary of loan activity from the HMDA data for 2007 through 2013. There were a total of 228,831 applications with 118,419 loan originations, translating to an origination rate (percentage of applications resulting in loans) of 51.7 percent. Using the sum of originations and denials to compute an origination rate results in an origination rate of 67.3 percent; this method excludes the following instances: applications that were withdrawn, files that were closed due to incompleteness and pre-approval requests that were either approved or denied. Table 13 breaks out the home loan activity by loan type, race, ethnicity, income, and loan purpose. The majority of applications, 186,673, were for conventional loans, corresponding to an origination rate of 50.5 percent. This was followed by 33,063 applications for Federal Housing Administration (FHA)-insured loans and 9,095 applications for Veterans Administration (VA)-guaranteed, with origination rates of 55.8 percent, 63.1 percent respectively.

White applicants represented the largest number of loan applicants at 178,910 or 78.2 percent, with an origination rate of 55.0 percent. African Americans submitted 11,977 applications and had an origination rate that was substantially lower at 37.5 percent. Applicants of other races submitted 6,827 applications, corresponding to an origination rate of 48.0 percent. When examining ethnicity, Hispanics accounted for 10,792 applications and had an origination rate of 47.2 percent, also significantly higher than African Americans.

High-income applicants showed a significantly higher number of applications at 101,753, with an origination rate of 54.8 percent. The number of applications for all other income groups drops significantly; the origination rates, however, decrease incrementally from 51.5 percent for the middle-income applicants to 39.7 percent for the very low income.

Refinancing loans showed the highest number of applications at 142,892 for loan purpose, with an origination rate of 47.7 percent, followed by home purchase applications (68,587), with an origination rate of 64.1 percent. There were considerably less home improvement applications at 17,352, with an origination rate of 35.8 percent.

Table 14 examines the HMDA data using the same categories used in the previous table (i.e., Loan Type, Race, Ethnicity, Income, and Loan Purpose); in this table, however, the percentage of total loan originations is calculated within the categories. For example, the first percentage in the "% of Loans Originated" column indicates that 79.6 percent of the loan originations in the County

were for conventional loans. This was followed by FHA loans and VA-Other loans, which accounted for 15.6 percent and 4.8 percent of the total loan originations, respectively. Refinancing accounted for 57.6 percent of total loan originations, followed by home purchase at 39.6 percent and home improvement at 5.3 percent.

To facilitate comparisons of originations by racial and ethnic categories, their respective percentages in the population are provided, as tabulated by the US Census Bureau: State and County QuickFacts. Whites showed highest percentage at 83.2 percent of the total loan originations in the County, compared to 83.4 percent of the population. For African Americans, 3.8 percent of total origination was considerably lower the 10.8 percent of the total population that they represent. The same pattern was true of Hispanics, who represented 4.3 percent of the total loan originations versus 8.2 percent of Hispanics in the population. 11.0 percent of the records were missing data on race.

The two highest income groups accounted for the majority of the total loan originations, with the high (≥ 120 of median) and (100-119 percent of median) groups showing 47.1 percent and 9.5 percent of the loan originations respectively. In contrast, the percentage of total loan originations accounted for by the (< 50 percent of median) group was 5.1 percent. The (50-79 percent of median) and (80-99 percent of median) income groups accounting for 17.6 percent and 11.0 percent of the total loan originations, respectively.

Table 15, illustrated by Charts 16-21, uses the HMDA data to look at the possibility of redlining within the County. The term *redlining* herein refers to a discriminatory lending practice where lenders avoid doing business or charge higher than normal rates to individuals in certain poor (or allegedly undesirable) neighborhoods. Assuming that these poor or undesirable neighborhoods can be characterized by very-low income (< 50 percent median income), a comparison of origination rates by income within these tracts to high income (≥ 120 median income) tracts could reveal potential redlining.

Origination rates for Pinellas County indicate that loan origination rates were distributed relatively evenly across the income categories, decreasing from 54.8 percent for the high income (≥ 120 of median) category to 39.7 percent for the very low (< 50 percent of median) category.

A comparison of origination rates by applicant income within high income (≥ 120 of median) census tracts to origination rates by applicant income within very low (< 50 percent of median) income tracts showed large differences between origination and denial rates. The difference in origination rates ranged from 7.7 percent to 22.9 percent lower by applicant income in the very low income (< 50 percent of median) census tracts when compared to the high income (≥ 120 of median) census tracts. Data show a similar pattern with denial rates running from 5.3 percent to

17.7 percent higher across applicant income categories in very low (<50 percent of median) census tracts when compared to high income (≥ 120 of median) census tracts.

When comparing the origination rates of the total of “originated and denied loans” (which exclude circumstances such as loan withdrawn, file closed for incompleteness, approved but not accepted, and preapproval requests denied or approved), the differences in origination rates ranged from 8.4 percent to 25.6 percent lower by applicant income in the very low income (<50 percent of median) census tracts when compared to the high income (≥ 120 of median) census tracts.

Finally, when comparing both the high income tracts and low income tracts to all of Pinellas County, using the origination rates of the total of “originated and denied loans”, the origination rates in the high income census tracts were greater than Pinellas County, as well the originations rates of the total of “originated and denied loans”, the origination rates in the very low income census tracts were less than Pinellas County (differences highlighted in Table 14). Ideally, origination rates should be similar among same income groups regardless of the income for the census tract where the subject property is located. The origination rates of all the income groups increase as the tract income increases. This indicates that families with similar incomes are more likely to successfully originate a loan for property if they live in a higher income census tract. Therefore, some characteristics of redlining may be present in lower income tracts in the community. The relatively small number of applications in the lower income tracts, however, makes any conclusive determination of redlining difficult.

Map 12 indicates the locations of credit unions and banks/other financial institutions as it relates to census tracts according to income level. Throughout Pinellas County, financial institutions are located along high-traffic corridors along with other retail, however in low-income areas where many residents do not have access to automobiles and public transportation, access to those retail corridors are more challenging. According to Inside Site Selection: Retailers’ Search for Strategic Business Locations, March 2008, published by International Council of Shopping Centers in partnership with Social Compact and Underserved Markets Task Force, “access to traditional financial services and fresh food are essential components of comprehensive community development. Limited access to traditional banking and financial services has long been a barrier to wealth creation in marginalized communities.” Communities without traditional financial services face paying check-cashing institutions, pay-day lending centers and other predatory financial service providers. While the demographics of an urban site may work for traditional financial institutions, other equally important factors that may be missing from urban communities is the day-time foot traffic generated by other commercial/retail business. Consequently, local governments need to promote redevelopment of retail cores in underserved

neighborhoods to make it feasible for traditional financial service providers and retailers to locate new stores and branches in urban settings.

Table 16, illustrated by Charts 22-29, compares origination rates between minorities and White applicants for the various loan purposes and income groups. White loan origination rates were consistently much higher than minorities, regardless of loan purpose. Conversely, the denial rates were much higher for minorities, with minorities showing denial rates of 15.8 percent, 11.8 percent, and 8.6 percent higher than Whites in Home Improvement Loans, Refinances, and Home Purchase loans, respectively. The same pattern manifests when racial differences within income groups were examined. Whites showed consistently higher originations across the income groups, a full 20 percentage points or higher than Minorities overall.

Map 9 illustrates the distribution of all loan applications by census tract (census tracts of 2010 Census) indexed to the population of each particular census tract. All of Pinellas County has an index of 25 (25% of the population submitted loan applications). The red census tracts indicate that 3 to 22 percent of the population for those census tracts submitted loan applications, yellow indicates 23 to 27 percent of the population for those census tracts submitted loan applications, light green indicates 28 to 35 percent of the population for those census tracts submitted loan applications. The yellow census tracts most closely represent the average of all Pinellas County at 25 percent.

Map 10 illustrates the number of loan denials for each 100 applications by census tracts (census tracts of 2010 Census). The average denial per 100 loan applications for all of Pinellas County is 25 denials. The census tracts, depicted in the dark green color, indicate for every 100 loan applications made, 14 to 22 were denied. The census tracts, depicted in the light green color, indicate for every 100 loan applications made, 23 to 27 were denied. The census tracts, depicted in the yellow color, indicate for every 100 loan applications made, 28 to 35 were denied, and finally the census tracts, depicted in the red color, indicate for every 100 loan applications made, 36 to 53 were denied. The census tracts, depicted in the light green color, most closely represent the average of all Pinellas County at 25 loan denials per 100 applications.

Map 11 indicates the locations of credit unions and banks/other financial institutions as it relates to census tracts according to income level. Throughout Pinellas County, financial institutions are located along high-traffic corridors along with other retail, however in low-income areas where many residents do not have access to automobiles, access to those retail corridors are more challenging. According to Inside Site Selection: Retailers' search for strategic business locations, March 2008, published by International Council of Shopping Centers in partnership with Social Compact and Underserved Markets Task Force, "access to traditional financial services and fresh

food are essential components of comprehensive community development. Limited access to traditional banking and financial services has long been a barrier to wealth creation in marginalized communities.” Communities without traditional financial services face paying check-cashing institutions, pay-day lending centers and other predatory financial service providers. While the demographics of an urban site may work for traditional financial institutions, other equally important factors that may be missing from urban communities is the day-time foot traffic generated by other commercial/retail business. “Consequently, cities need to promote redevelopment of retail cores in underserved neighborhoods to make it easier for traditional financial serve retailers to penetrate inner cities.”

Based on a review of the Home Mortgage Disclosure Act (HMDA) data, overall, origination rates among Whites were higher than minorities in home purchase, home improvement and refinance loans. Refinance loans were the most frequent loan type in the County and the three incorporated cities analyzed in this study. The loan applications and originations were significantly lower compared to their percentage in population for African Americans, Asians, and Hispanics in the County and the cities. This suggests two issues, the lack of applications from minorities and the rate of loan denials. The reasons for lower loan originations among minorities were inconclusive based on the overall data. However, during the period between 2007 and 2013, of the 57,531 loans that were denied, the majority of loan denial reasons for all applicants were related to the applicants' poor credit history, lack of collateral, or high debt-to-income ratio.

Additionally, while the analysis offered does not provide conclusive evidence of redlining, the data tend to suggest some characteristics of redlining may exist. Ideally, origination rates should be similar among same income groups regardless of the income for the census tract where the subject property is located. However, the origination rates for all the income groups increases as the tract income increases and decreased as the tract income decreased. This indicates that families with similar income are more likely to originate a loan for property in a higher income census tract in Pinellas County and the incorporated cities. While it is expected that very low-income applicants tend to have lower origination rates, within the very low-income census tracts, even high-income applicants showed a poor success rate. However, due to very low number of applications in the lower income census tracts, any conclusive determination of redlining is difficult.

Table 13: Loan Activity by Loan type, Race, Ethnicity, Income and Loan Purpose

<i>Loan Type</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Origination % of All Applications by Loan Type</i>	<i>Total Originated & Denied Applications</i>	<i>Origination % of Originated & Denied Applications by Loan Type</i>
Conventional	94,230	48,680	43,763	186,673	50.5%	142,910	65.9%
FHA-Insured	18,453	7,348	14,610	33,063	55.8%	25,801	71.5%
VA-Other	5,736	1,516	1,843	9,095	63.1%	7,252	79.1%
TOTAL	118,419	57,544	52,868	228,831	51.7%	175,963	67.3%

<i>Race</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Origination % of All Applications by Race</i>	<i>Total Originated & Denied Applications</i>	<i>Origination % of Originated & Denied Applications by Race</i>
American Indian or Alaska Native	350	327	198	875	40.0%	677	51.7%
Asian	2,603	1,449	1,259	5,311	49.0%	4,052	64.2%
African American	4,493	4,802	2,682	11,977	37.5%	9,295	48.3%
Native Hawaiian/Pacific Islander	320	176	145	641	49.9%	496	64.5%
White	98,477	41,659	38,774	178,910	55.0%	140,136	70.3%
Race Unknown	12,176	9,131	9,810	31,117	39.1%	21,307	57.1%
TOTAL	118,419	57,544	52,868	228,831	51.7%	175,963	67.3%

<i>Ethnicity</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Origination % of All Applications by Ethnicity</i>	<i>Total Originated & Denied Applications</i>	<i>Origination % of Originated & Denied Applications by Ethnicity</i>
Hispanic	5,096	3,329	2,367	10,792	47.2%	8,425	60.5%
Not Hispanic	101,036	45,127	40,856	187,019	54.0%	146,163	69.1%
Ethnicity Unknown	12,287	9,088	9,645	31,020	39.6%	21,375	57.5%
TOTAL	118,419	57,544	52,868	228,831	51.7%	175,963	67.3%

<i>Applicant Income</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Origination % of All Applications by Income</i>	<i>Total Originated & Denied Applications</i>	<i>Origination % of Originated & Denied Applications by Income</i>
<50% AMI	6,068	6,067	3,152	15,287	39.7%	12,135	50.0%
50%-79% AMI	20,810	12,212	9,311	42,333	49.2%	33,022	63.0%
80%-99% AMI	13,015	6,708	5,954	25,677	50.7%	19,723	66.0%
100%-119% AMI	11,263	5,547	5,058	21,868	51.5%	16,810	67.0%
120% + AMI	55,723	21,982	24,048	101,753	54.8%	77,705	71.7%
Income Unknown	11,540	5,028	5,345	21,913	52.7%	16,568	69.7%
TOTAL	118,419	57,544	52,868	228,831	51.7%	175,963	67.3%

<i>Loan Purpose</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Origination % of All Applications by Loan Purpose</i>	<i>Total Originated & Denied Applications</i>	<i>Origination % of Originated & Denied Applications by Loan Purpose</i>
Home Improvement	6,214	7,731	3,407	17,352	35.8%	13,945	44.6%
Home Purchase	43,981	11,609	12,997	68,587	64.1%	55,590	79.1%
Refinance	68,224	38,204	36,464	142,892	47.7%	106,428	64.1%
TOTAL	118,419	57,544	52,868	228,831	51.7%	175,963	67.3%

Table 14: Loan Activity by Loan type, Race, Ethnicity, Income and Loan Purpose-Categories

<i>Loan Type</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of All Originated Applications</i>
Conventional	94,230	48,680	43,763	186,673	79.6%
FHA-Insured	18,453	7,348	7,262	33,063	15.6%
VA-Other	5,736	1,516	1,843	9,095	4.8%
TOTAL	118,419	57,544	52,868	228,831	100.0%

<i>Total Originated & Denied Applications</i>	<i>Origination % of All Originated & Denied Applications</i>
142,910	81.2%
25,801	14.7%
7,252	4.1%
175,963	100.0%

<i>Race</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of All Originated Applications</i>
American Indian or Alaska Native	350	327	198	875	0.3%
Asian	2,603	1,449	1,259	5,311	2.2%
African American	4,493	4,802	2,682	11,977	3.8%
Native Hawaiian or Pacific Islander	320	176	145	641	0.3%
White	98,477	41,659	38,774	178,910	83.2%
Not Available/Applicable	12,176	9,131	9,810	31,117	10.3%
TOTAL	118,419	57,544	52,868	228,831	100.0%

<i>Total Originated & Denied Applications</i>	<i>Origination % of All Originated & Denied Applications</i>
677	0.4%
4,052	2.3%
9,295	5.3%
496	0.3%
140,136	79.6%
21,307	12.1%
175,963	100.0%

<i>Ethnicity</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of All Originated Applications</i>
Hispanic	5,096	3,329	2,367	10,792	4.3%
Not Hispanic	101,036	45,127	40,856	187,019	85.3%
Not Available/Applicable	12,287	9,088	9,645	31,020	10.4%
TOTAL	118,419	57,544	52,868	228,831	100.0%

<i>Total Originated & Denied Applications</i>	<i>Origination % of All Originated & Denied Applications</i>
8,425	4.8%
146,163	83.1%
21,375	12.1%
175,963	100.0%

<i>Applicant Income</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of All Originated Applications</i>
<50% AMI	6,068	6,067	3,152	15,287	5.1%
50%-79% AMI	20,810	12,212	9,311	42,333	17.6%
80%-99% AMI	13,015	6,708	5,954	25,677	11.0%
100%-119% AMI	11,263	5,547	5,058	21,868	9.5%
120% + AMI	55,723	21,982	24,048	101,753	47.1%
Income Unknown	11,540	5,028	5,345	21,913	9.7%
TOTAL	118,419	57,544	52,868	228,831	100.0%

<i>Total Originated & Denied Applications</i>	<i>Origination % of All Originated & Denied Applications</i>
12,135	6.9%
33,022	18.8%
19,723	11.2%
16,810	9.6%
77,705	44.2%
16,568	9.4%
175,963	100.0%

<i>Loan Purpose</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of All Originated Applications</i>
Home Improvement	6,214	7,731	3,407	17,352	5.2%
Home Purchase	43,981	11,609	12,997	68,587	37.1%
Refinance	68,224	38,204	36,464	142,892	57.6%
TOTAL	118,419	57,544	52,868	228,831	100.0%

<i>Total Originated & Denied Applications</i>	<i>Origination % of All Originated & Denied Applications</i>
13,945	7.9%
55,590	31.6%
106,428	60.5%
175,963	100.0%

Table 15: Comparison of Resident Income between High and Low Income Census Tracts

<i>High Income Tracts</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% Originated by Income</i>	<i>% Denied by Income</i>
<50% AMI	312	330	162	804	38.8%	41.0%
50%-79% AMI	1,347	684	548	2,579	52.2%	26.5%
80%-99% AMI	1,215	474	471	2,160	56.3%	21.9%
100%-119% AMI	1,324	468	460	2,252	58.8%	20.8%
120% + AMI	11,828	3,621	4,486	19,935	59.3%	18.2%
TOTAL	16,026	5,577	6,127	27,730	57.8%	20.1%

<i>Low Income Tracts</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% Originated by Income</i>	<i>% Denied by Income</i>
<50% AMI	299	445	217	961	31.1%	46.3%
50%-79% AMI	667	707	432	1,806	36.9%	39.1%
80%-99% AMI	301	256	205	762	39.5%	33.6%
100%-119% AMI	207	222	148	577	35.9%	38.5%
120% + AMI	770	499	461	1,730	44.5%	28.8%
TOTAL	2,244	2,129	1,463	5,836	38.5%	36.5%

<i>Difference Between High Income and Low Income Tracts</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>Percent Originated</i>	<i>Percent Denied</i>
<50% AMI	13	(115)	(55)	(157)	7.7%	(5.3%)
50%-79% AMI	680	(23)	116	773	15.3%	(12.6%)
80%-99% AMI	914	218	266	1,398	16.7%	(11.7%)
100%-119% AMI	1,117	246	312	1,675	22.9%	(17.7%)
120% + AMI	11,058	3,122	4,025	18,205	14.8%	(10.7%)
TOTAL	13,782	3,448	4,664	21,894	19.3%	(16.4%)

<i>Pinellas County</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% Originated by Income</i>	<i>% Denied by Income</i>
<50% AMI	6,068	6,067	3,152	15,287	39.7%	39.7%
50%-79% AMI	20,810	12,212	9,311	42,333	49.2%	28.8%
80%-99% AMI	13,015	6,708	5,954	25,677	50.7%	26.1%
100%-119% AMI	11,263	5,547	5,058	21,868	51.5%	25.4%
120% + AMI	55,723	21,982	24,048	101,753	54.8%	21.6%
Income Unknown	11,540	5,028	5,345	21,913	52.7%	22.9%
TOTAL	118,419	57,544	52,868	228,831	51.7%	25.1%

<i>Total Originated & Denied Applications</i>	<i>% Originated of Originated & Denied Applications by Income</i>	<i>% Denied of Originated & Denied Applications by Income</i>
642	48.6%	51.4%
2,031	66.3%	33.7%
1,689	71.9%	28.1%
1,792	73.9%	26.1%
15,449	76.6%	23.4%
21,603	74.2%	25.8%

<i>Total Originated & Denied Applications</i>	<i>% Originated of Originated & Denied Applications by Income</i>	<i>% Denied of Originated & Denied Applications by Income</i>
744	40.2%	59.8%
1,374	48.5%	51.5%
557	54.0%	46.0%
429	48.3%	51.7%
1,269	60.7%	39.3%
4,373	51.3%	48.7%

<i>Total Difference of Originated & Denied Applications</i>	<i>Difference Between % Originated of Originated & Denied Applications by Income</i>	<i>Difference Between % Denied of Originated & Denied Applications by Income</i>
(102)	8.4%	(8.4%)
657	17.8%	(17.8%)
1,132	17.9%	(17.9%)
1,363	25.6%	(25.6%)
14,180	15.9%	(15.9%)
17,230	22.9%	(22.9%)

<i>Total Originated & Denied Applications</i>	<i>% Originated of Originated & Denied Applications by Income</i>	<i>% Denied of Originated & Denied Applications by Income</i>
12,135	50.0%	50.0%
33,022	63.0%	37.0%
19,723	66.0%	34.0%
16,810	67.0%	33.0%
77,705	71.7%	28.3%
16,568	69.7%	30.3%
175,963	67.3%	32.7%

Origination and Denials Rates Greater than Pinellas County

Table 16: Comparison of Loan Originations and Denials by Race

<i>Loan Type</i>	<i>Race</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of Applications</i>	<i>% Originated by Race</i>	<i>% Denied by Race</i>
Home Improvement	White	4,882	5,135	2,459	12,476	71.9%	39.1%	41.2%
	Minority	643	1,370	391	2,404	13.9%	26.7%	57.0%
	Race Unknown	689	1,226	557	2,472	14.2%	27.9%	49.6%
	Total	6,214	7,731	3,407	17,352	100.0%		
Home Purchase	White	37,154	8,934	10,062	56,150	81.9%	66.2%	15.9%
	Minority	2,904	1,279	1,048	5,231	7.6%	55.5%	24.5%
	Race Unknown	3,923	1,396	1887	7,206	10.5%	54.4%	19.4%
	Total	43,981	11,609	12,997	68,587	100.0%		
Refinance	White	56,441	27,590	26,253	110,284	77.2%	51.2%	25.0%
	Minority	4,219	4,105	2,845	11,169	7.8%	37.8%	36.8%
	Race Unknown	7,564	6,509	7,366	21,439	15.0%	35.3%	30.4%
	Total	68,224	38,204	36,464	142,892	100.0%		
TOTAL	White	98,477	41,659	38,774	178,910	78.2%	55.0%	23.3%
	Minority	7,766	6,754	4,284	18,804	8.2%	41.3%	35.9%
	Race Unknown	12,176	9,131	9,810	31,117	13.6%	39.1%	29.3%
	Total	118,419	57,544	52,868	228,831	100.0%		
<i>Applicant Income</i>	<i>Race</i>	<i>Originated</i>	<i>Denied</i>	<i>Other</i>	<i>Total</i>	<i>% of Applications</i>	<i>% Originated by Income</i>	<i>% Denied by Income</i>
<50% AMI	White	4,895	4,120	2,166	11,181	73.1%	43.8%	36.8%
	Minority	609	997	388	1,994	13.0%	30.5%	50.0%
	Race Unknown	564	950	598	2,112	13.8%	26.7%	45.0%
	Total	6,068	6,067	3,152	15,287	100.0%		
50%-79% AMI	White	17,029	8,499	6,619	32,147	75.9%	53.0%	26.4%
	Minority	1,881	1,932	1,079	4,892	11.6%	38.5%	39.5%
	Race Unknown	1,900	1,781	1,613	5,294	12.5%	35.9%	33.6%
	Total	20,810	12,212	9,311	42,333	100.0%		
80%-99% AMI	White	10,815	4,836	4,381	20,032	78.0%	54.0%	24.1%
	Minority	986	828	526	2,340	9.1%	42.1%	35.4%
	Race Unknown	1,214	1,044	1,047	3,305	12.9%	36.7%	31.6%
	Total	13,015	6,708	5,954	25,677	100.0%		
100%-119% AMI	White	9,340	3,993	3,742	17,075	78.1%	54.7%	23.4%
	Minority	770	649	453	1,872	8.6%	41.1%	34.7%
	Race Unknown	1,153	905	863	2,921	13.4%	39.5%	31.0%
	Total	11,263	5,547	5,058	21,868	100.0%		
120% + AMI	White	46,992	16,854	18,407	82,253	80.8%	57.1%	20.5%
	Minority	2,621	1,771	1,374	5,766	5.7%	45.5%	30.7%
	Race Unknown	6,110	3,357	4,267	13,734	13.5%	44.5%	24.4%
	Total	55,723	21,982	24,048	101,753	100.0%		
Income Unknown	White	5,923	1,779	2,147	9,849	44.9%	60.1%	18.1%
	Minority	4,802	264	282	5,348	24.4%	89.8%	4.9%
	Race Unknown	815	2,985	2,916	6,716	30.6%	12.1%	44.4%
	Total	11,540	5,028	5,345	21,913	100.0%		
TOTAL	White	94,994	40,081	37,462	172,537	75.4%	55.1%	23.2%
	Minority	11,669	6,441	4,102	22,212	9.7%	52.5%	29.0%
	Race Unknown	11,756	11,022	11,304	34,082	14.9%	34.5%	32.3%
	Total	118,419	57,544	52,868	228,831	100.0%		

Chart 11: Originations Rate by Loan Type

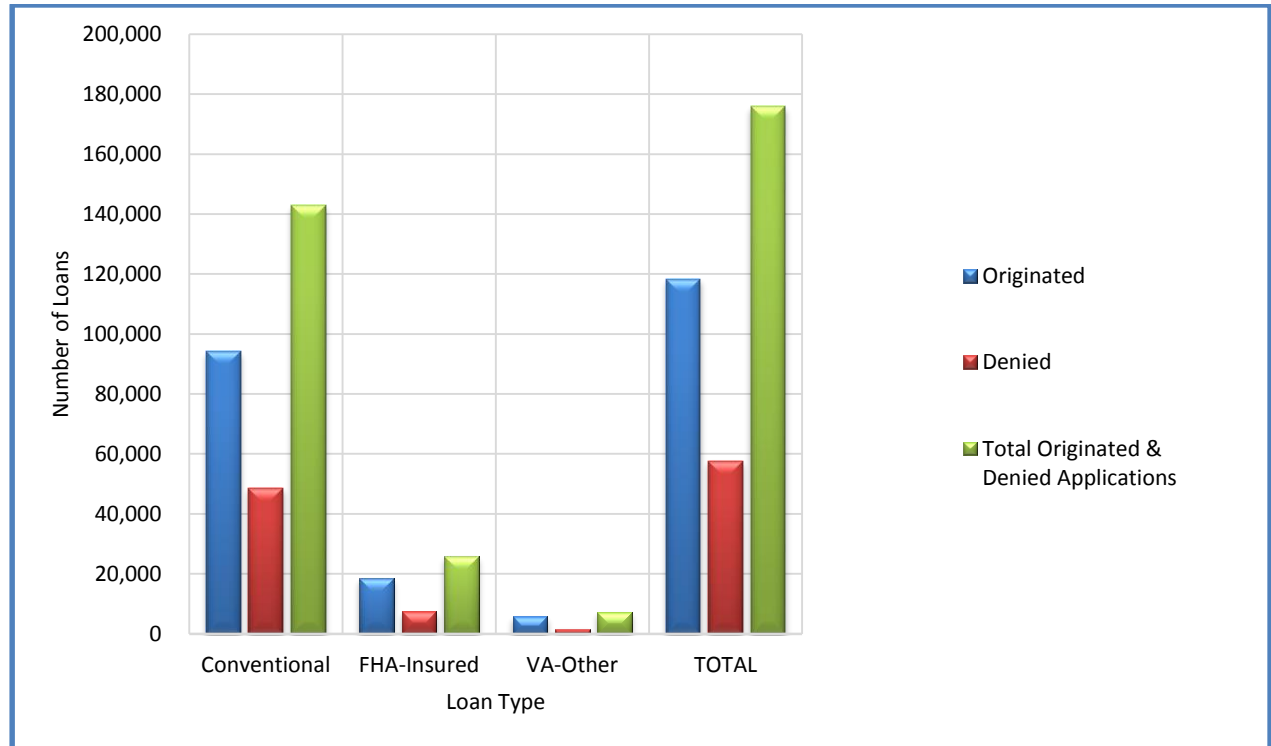


Chart 12 Origination Rates by Race

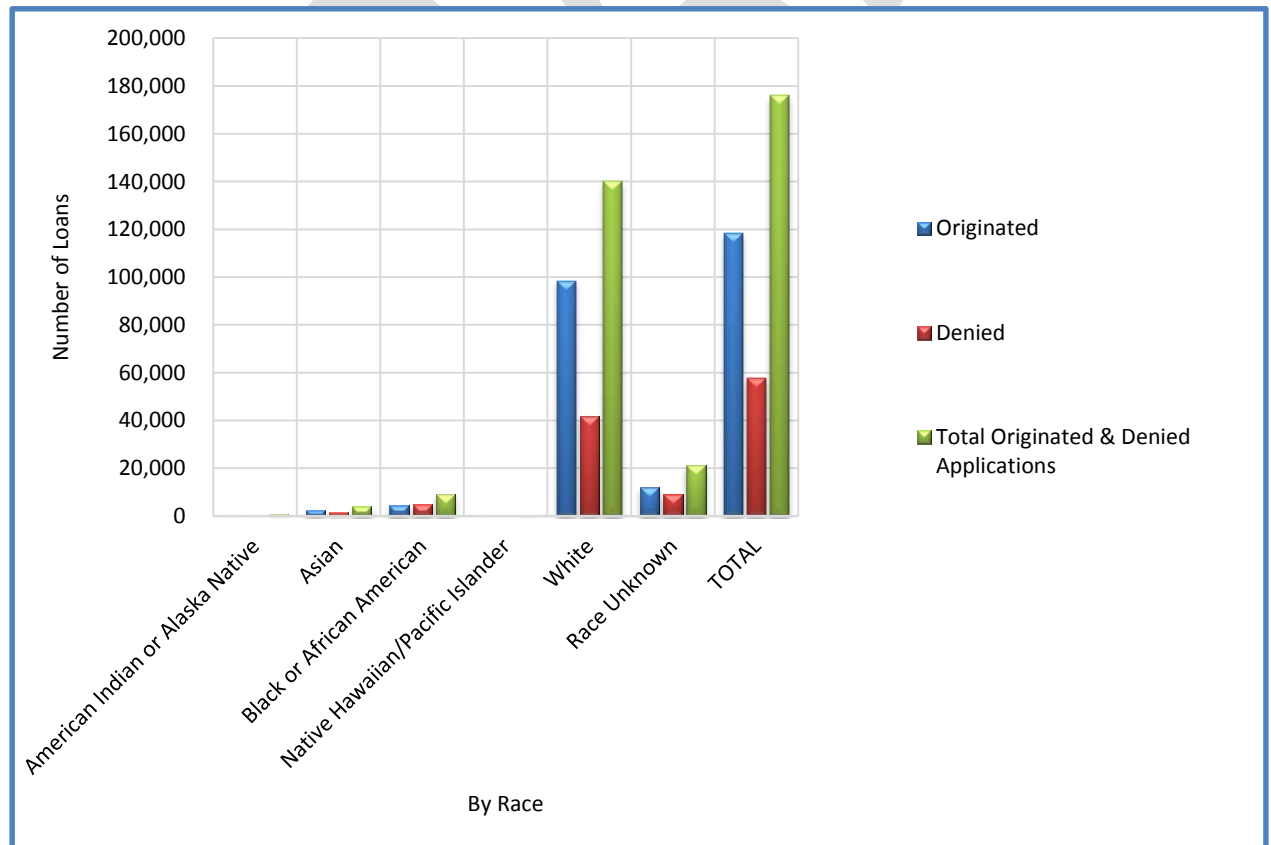


Chart 13: Origination Rates by Ethnicity

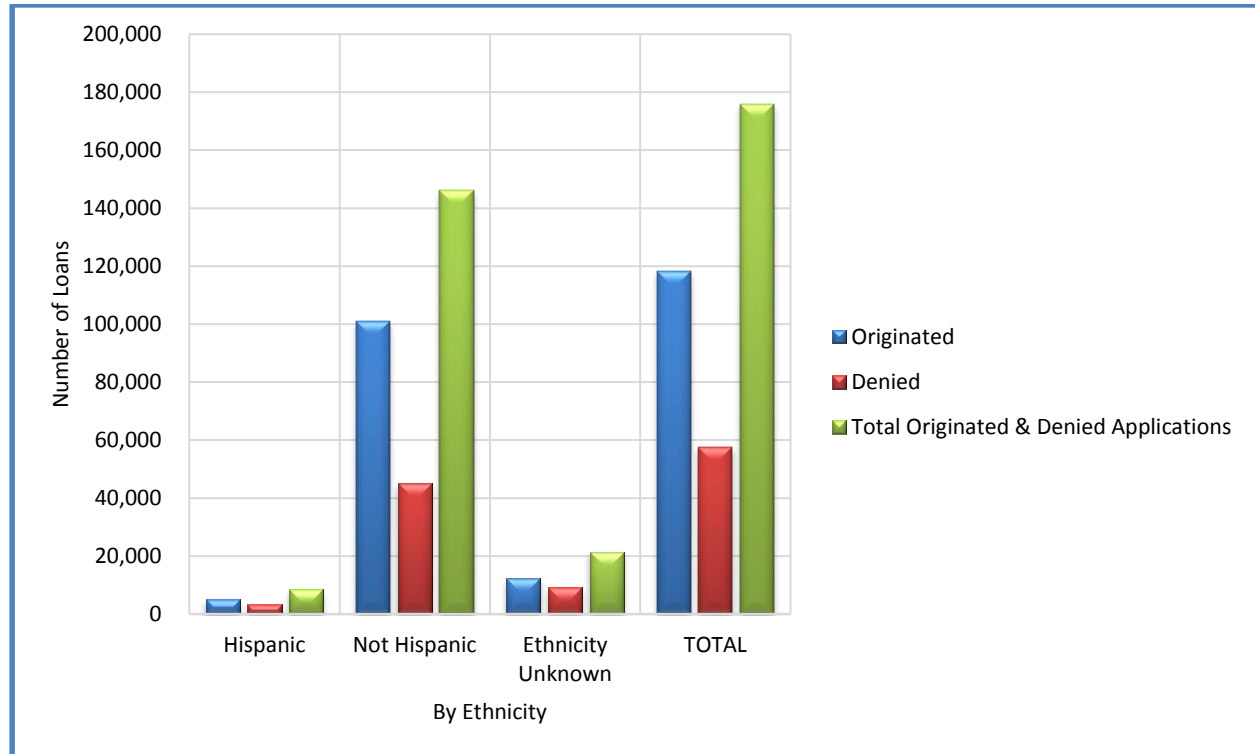


Chart 14: Origination Rates by Applicant Income

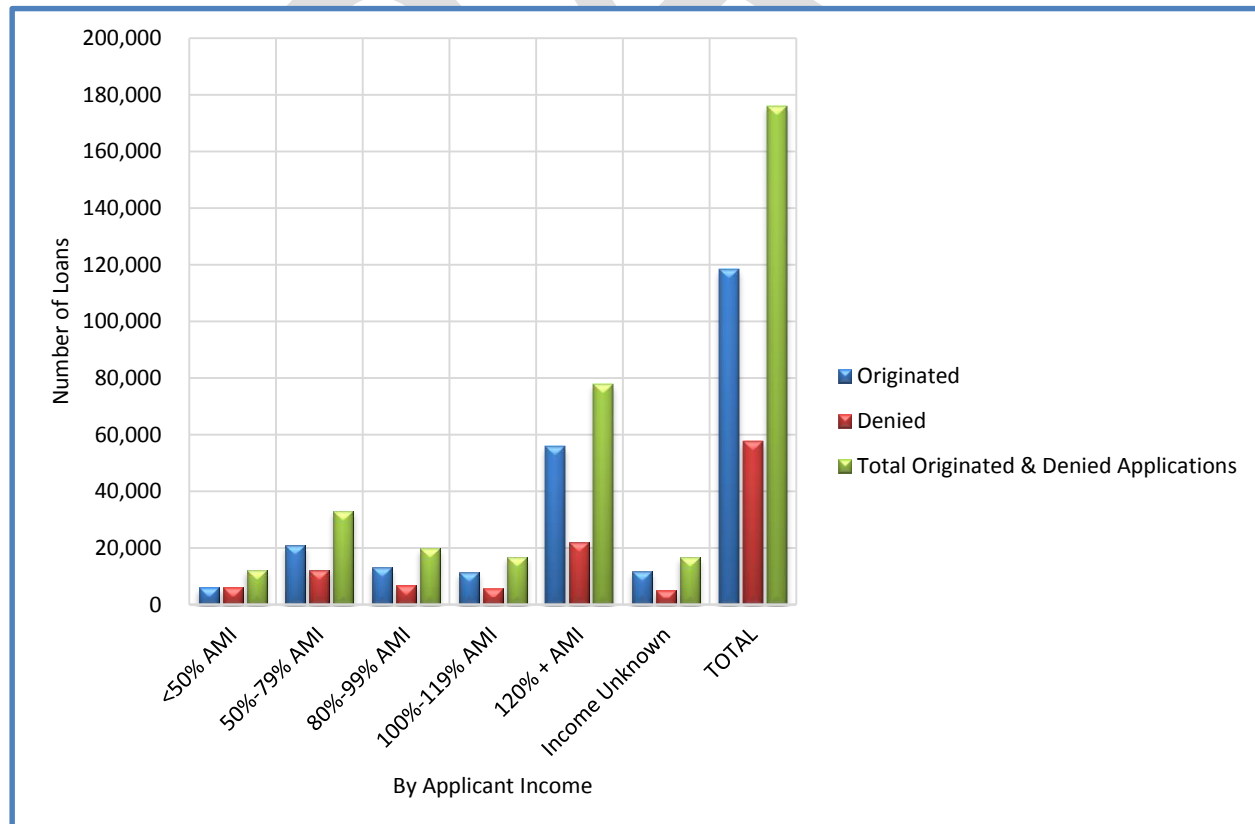


Chart 15: Origination Rates by Loan Purpose

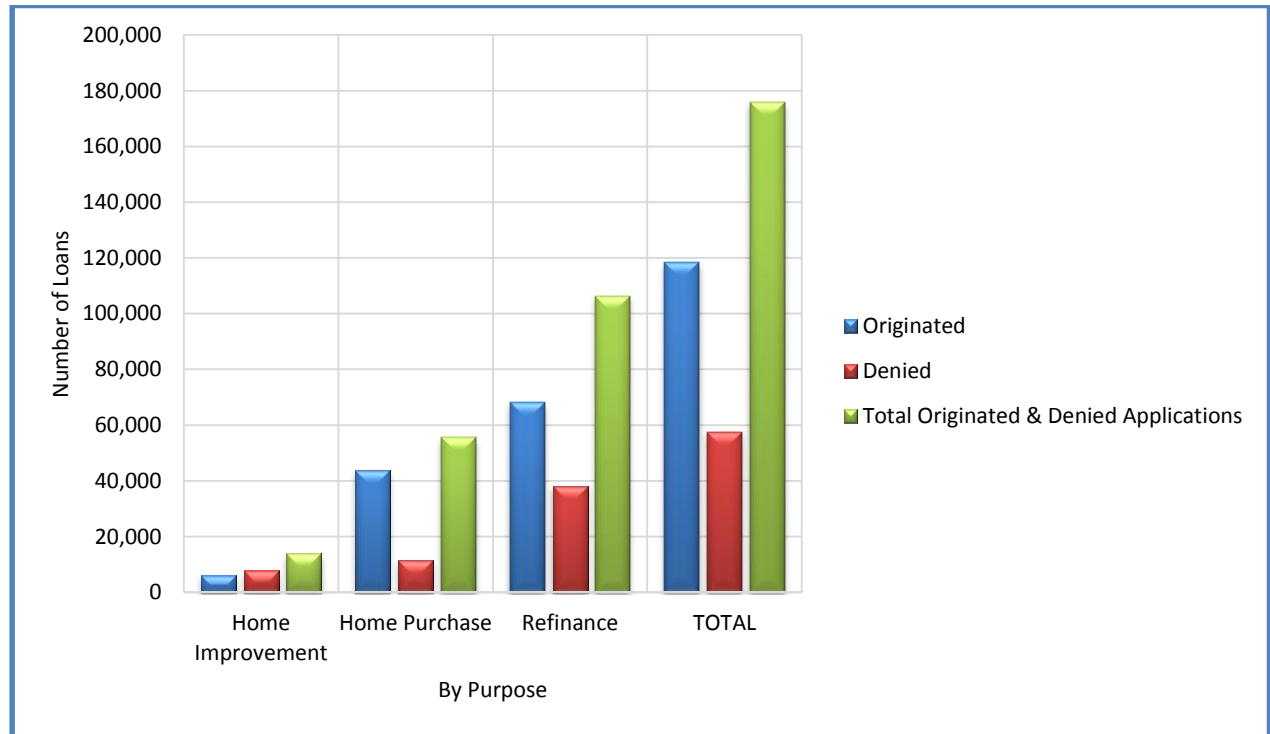


Chart 16: Loans Originated – High Income Census Tract

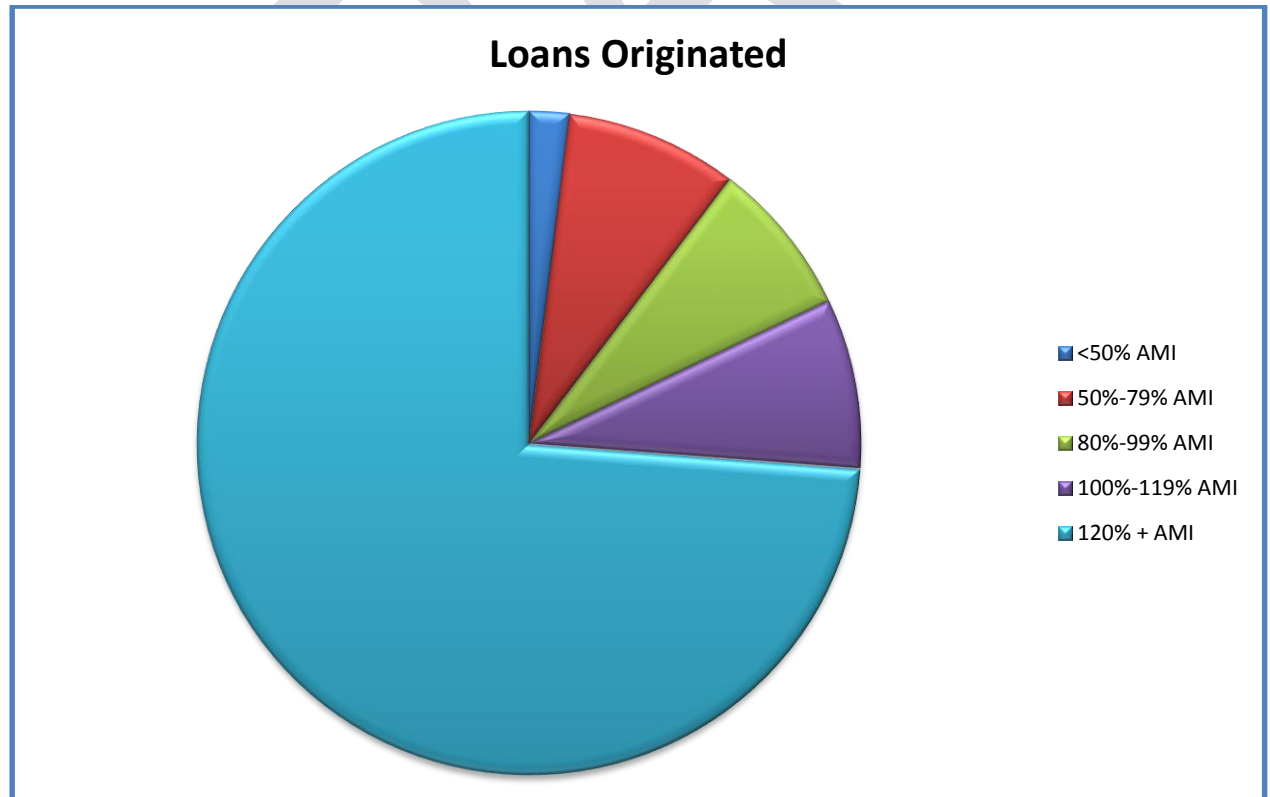


Chart 17: Loans Originated – Low Income Census Tracts

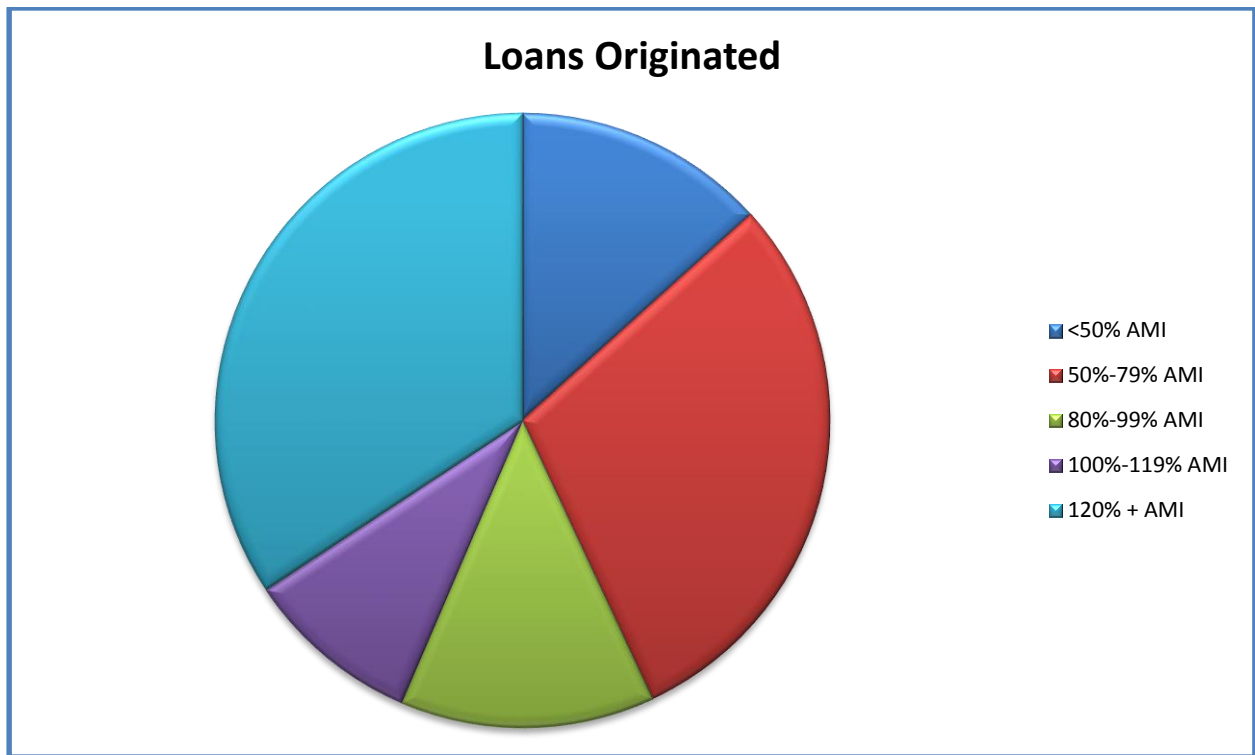


Chart 18 Loans Originated – All Pinellas County Census Tracts

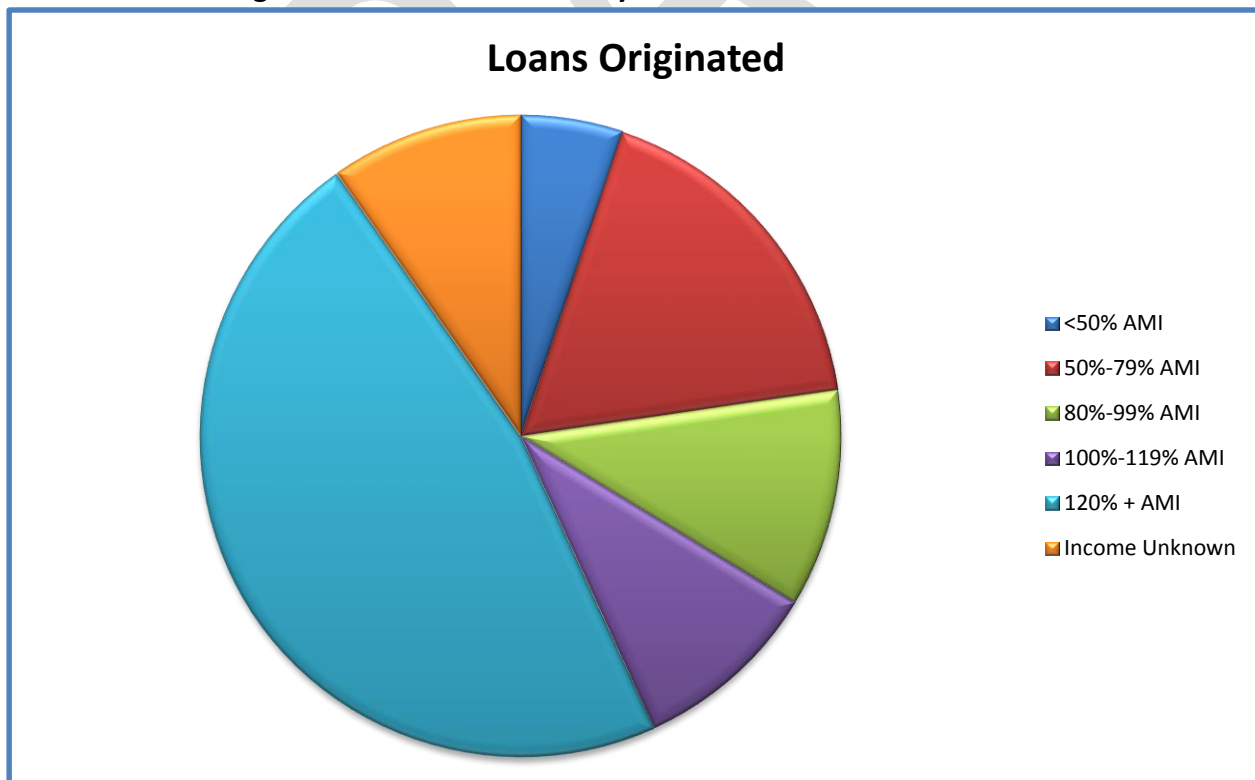


Chart 19: Total Originated & Denied Loans – High Income Tract

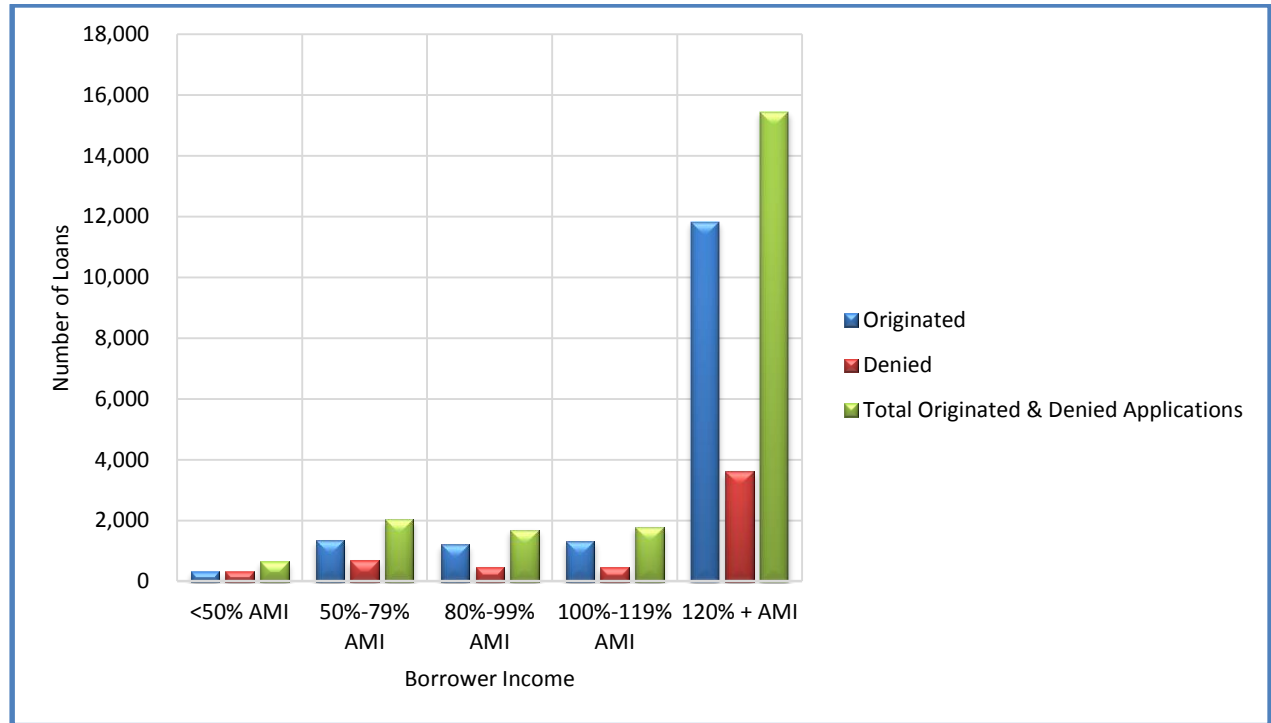


Chart 20: Total Originated & Denied Loans - Low Income Tract

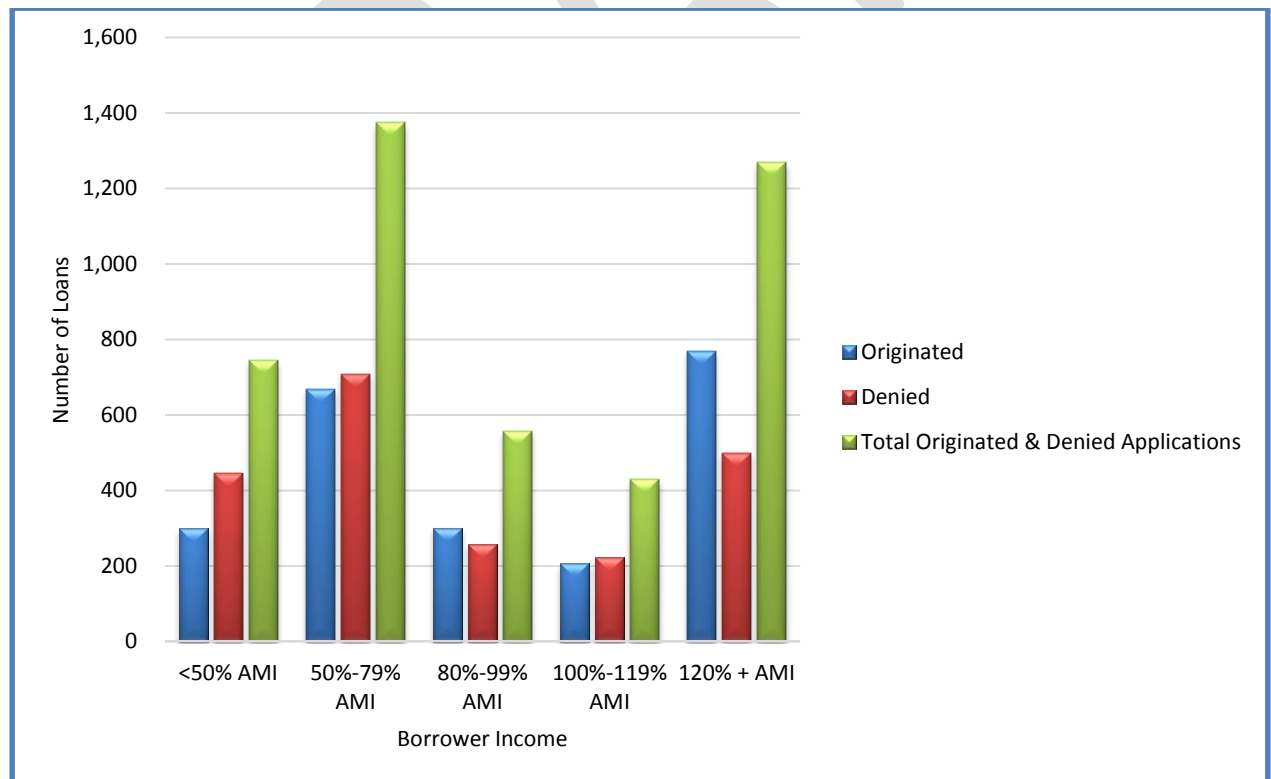


Chart 21: Total Originated & Denied Loans – All Pinellas County Census Tracts

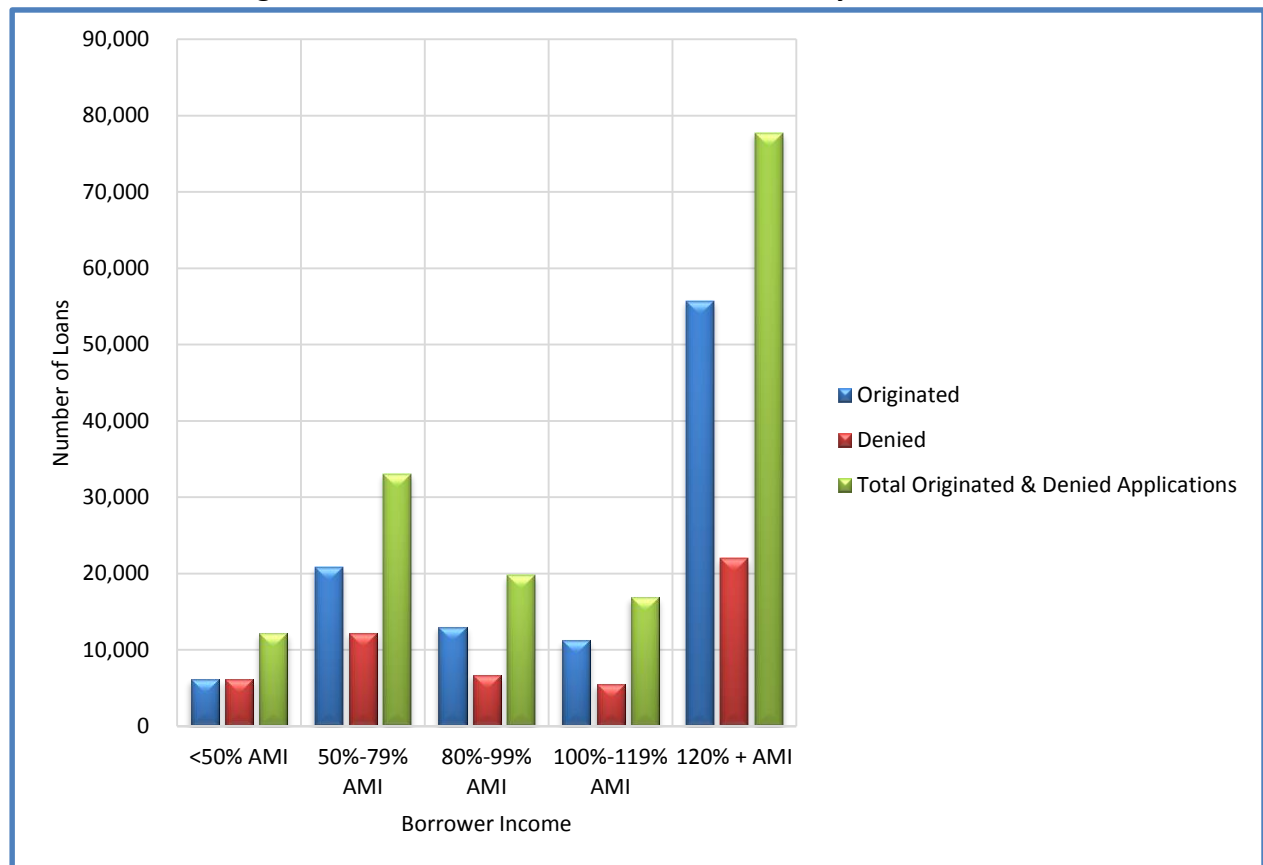


Chart 22: Home Improvement Loans Originated by Race

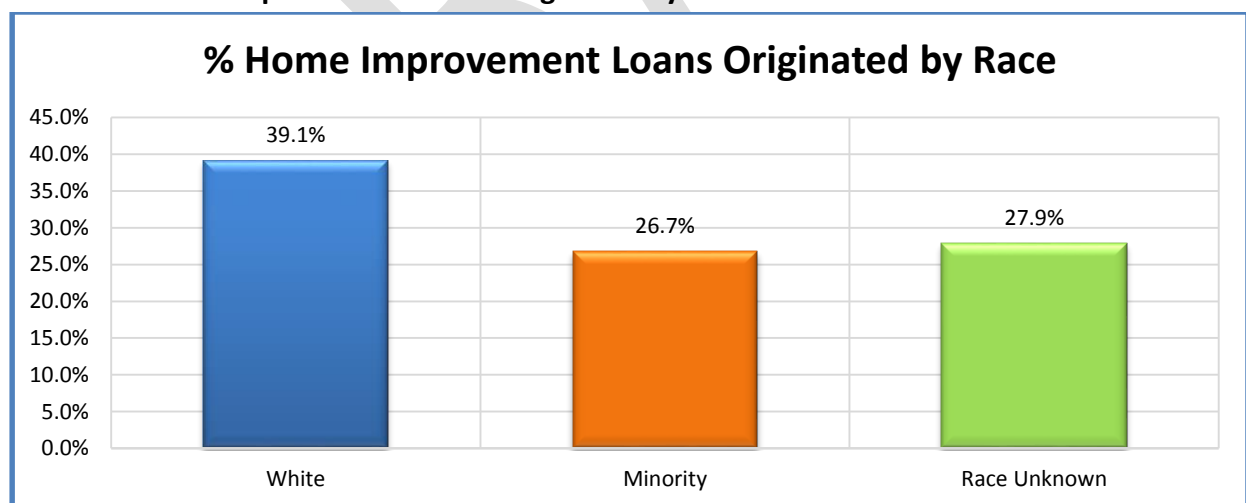


Chart 23: Home Purchase Loans Originated by Race

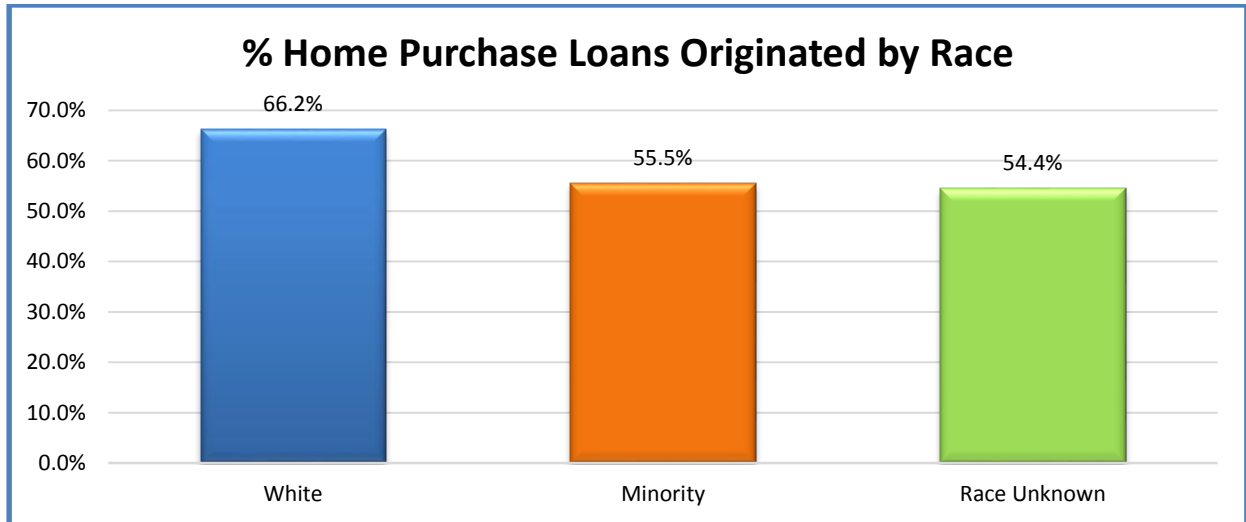


Chart 24: Refinance Loans Originated by Race

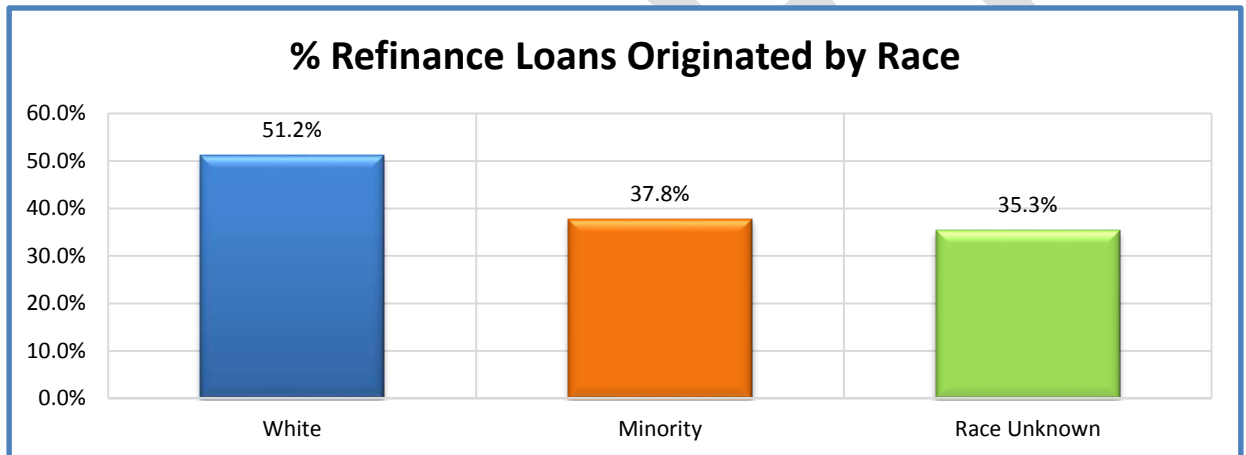


Chart 25: Originations by Applicant Income and Race (<50% AMI)

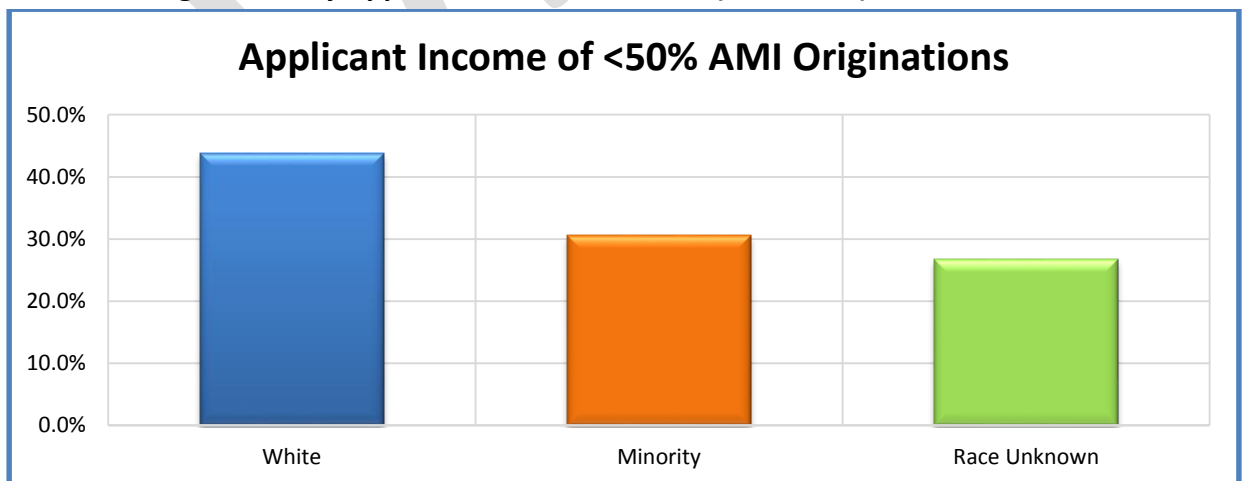


Chart 26: Originations by Applicant Income and Race (50-79% AMI)

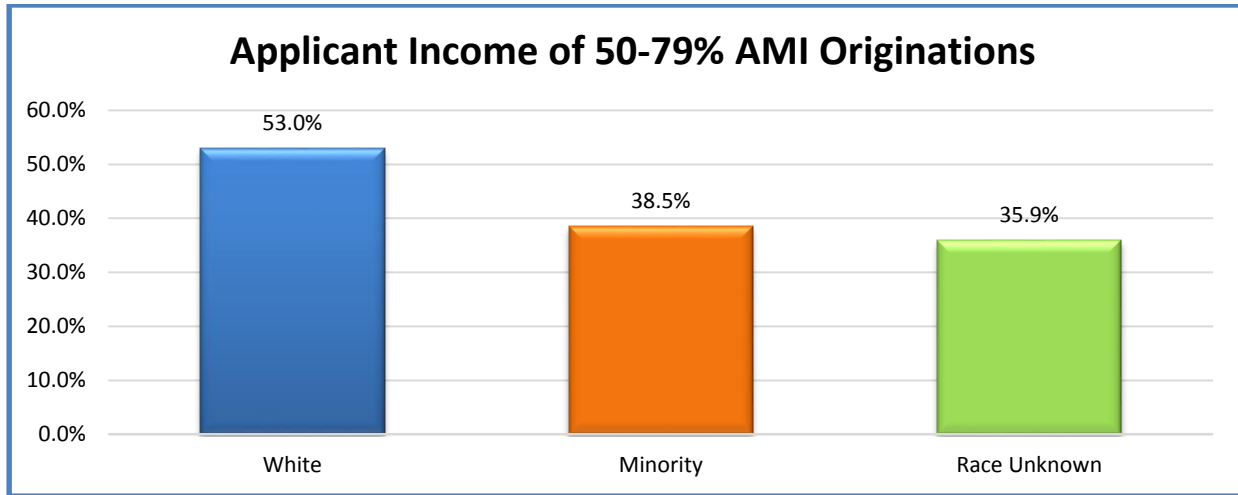


Chart 27: Originations by Applicant Income and Race (80-99% AMI)

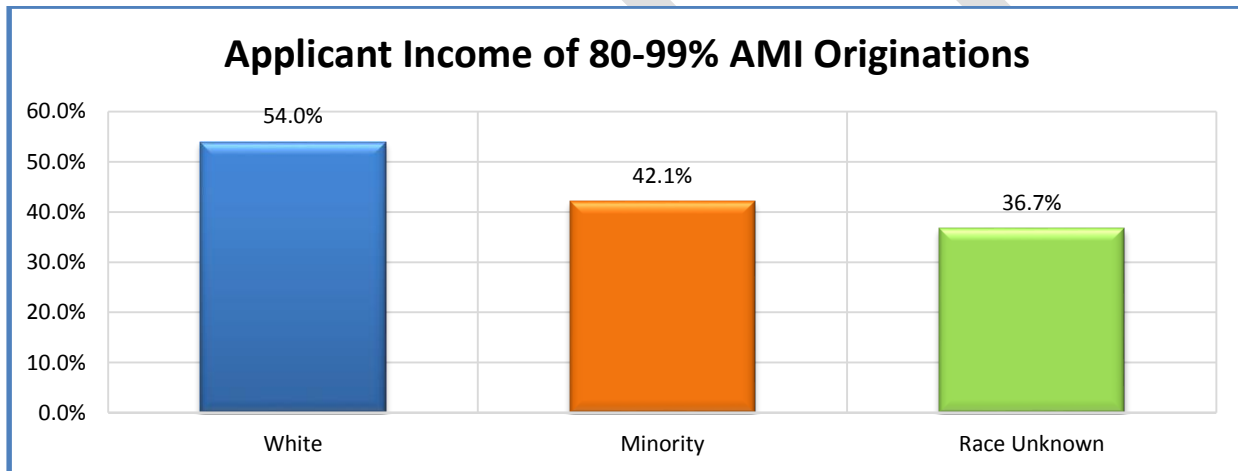


Chart 28: Originations by Applicant Income and Race (100-119% AMI)

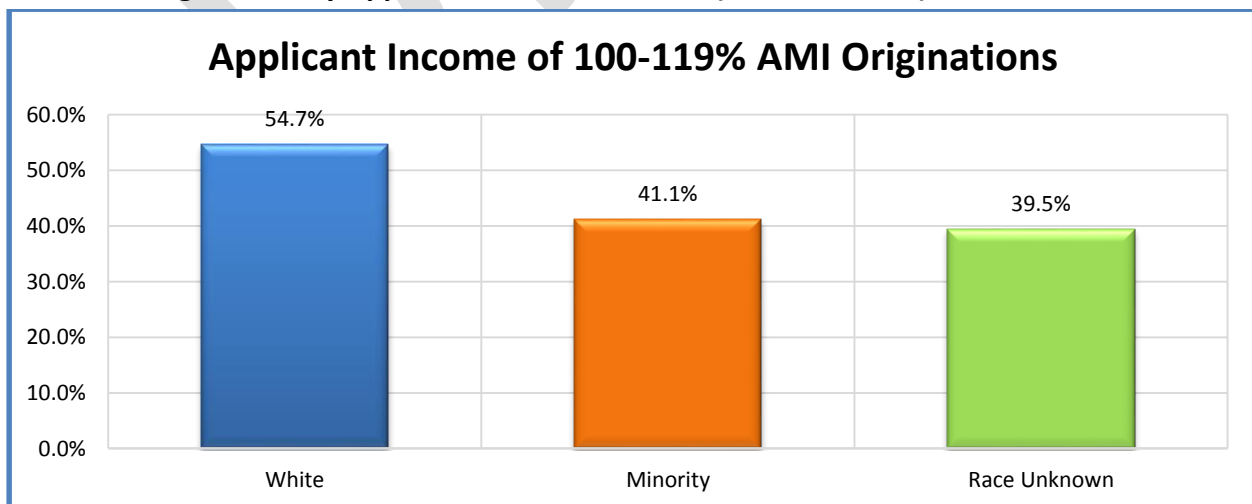
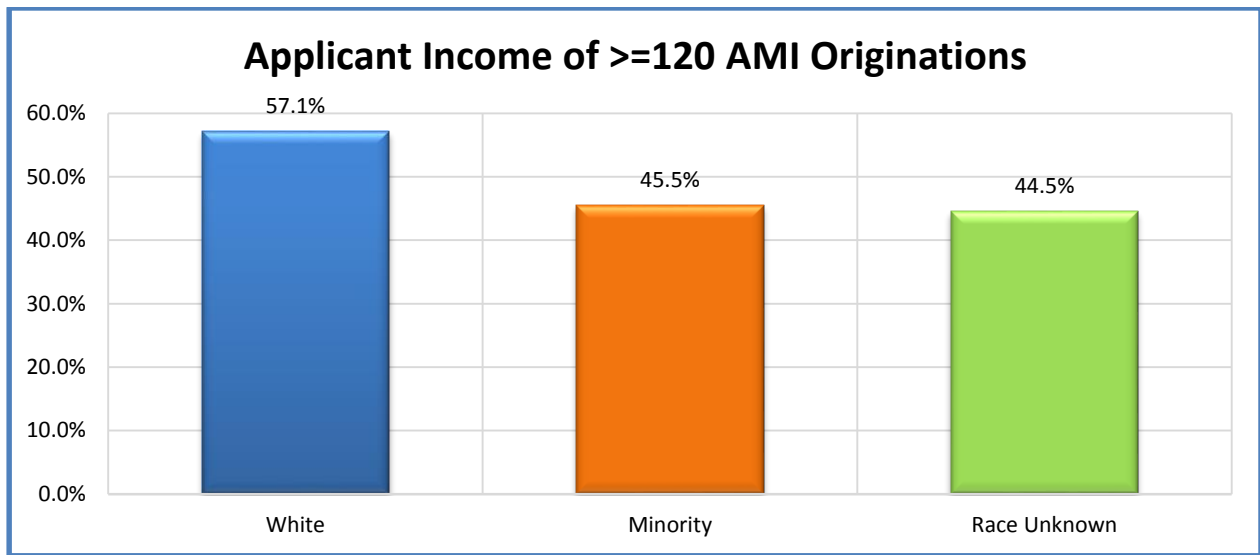
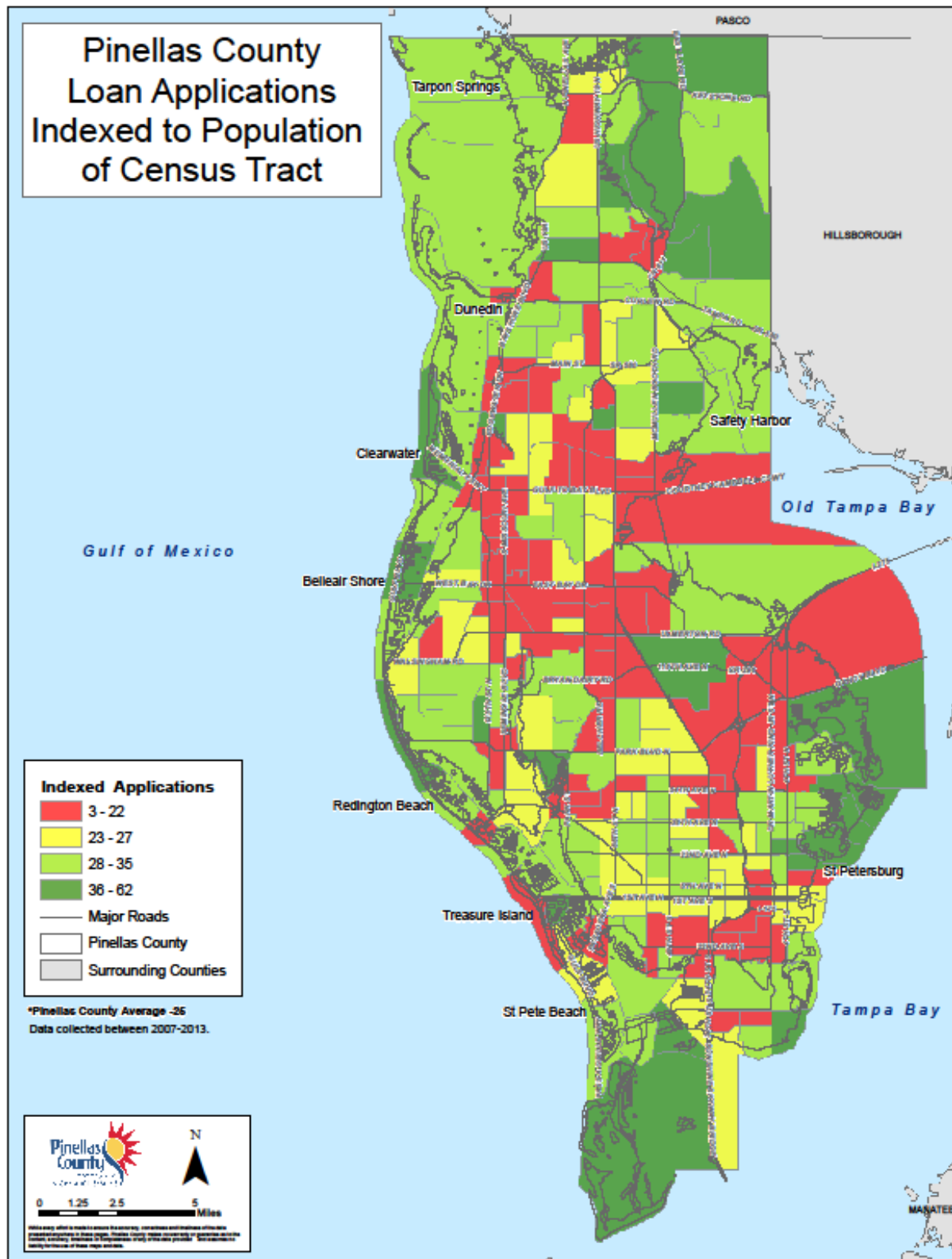


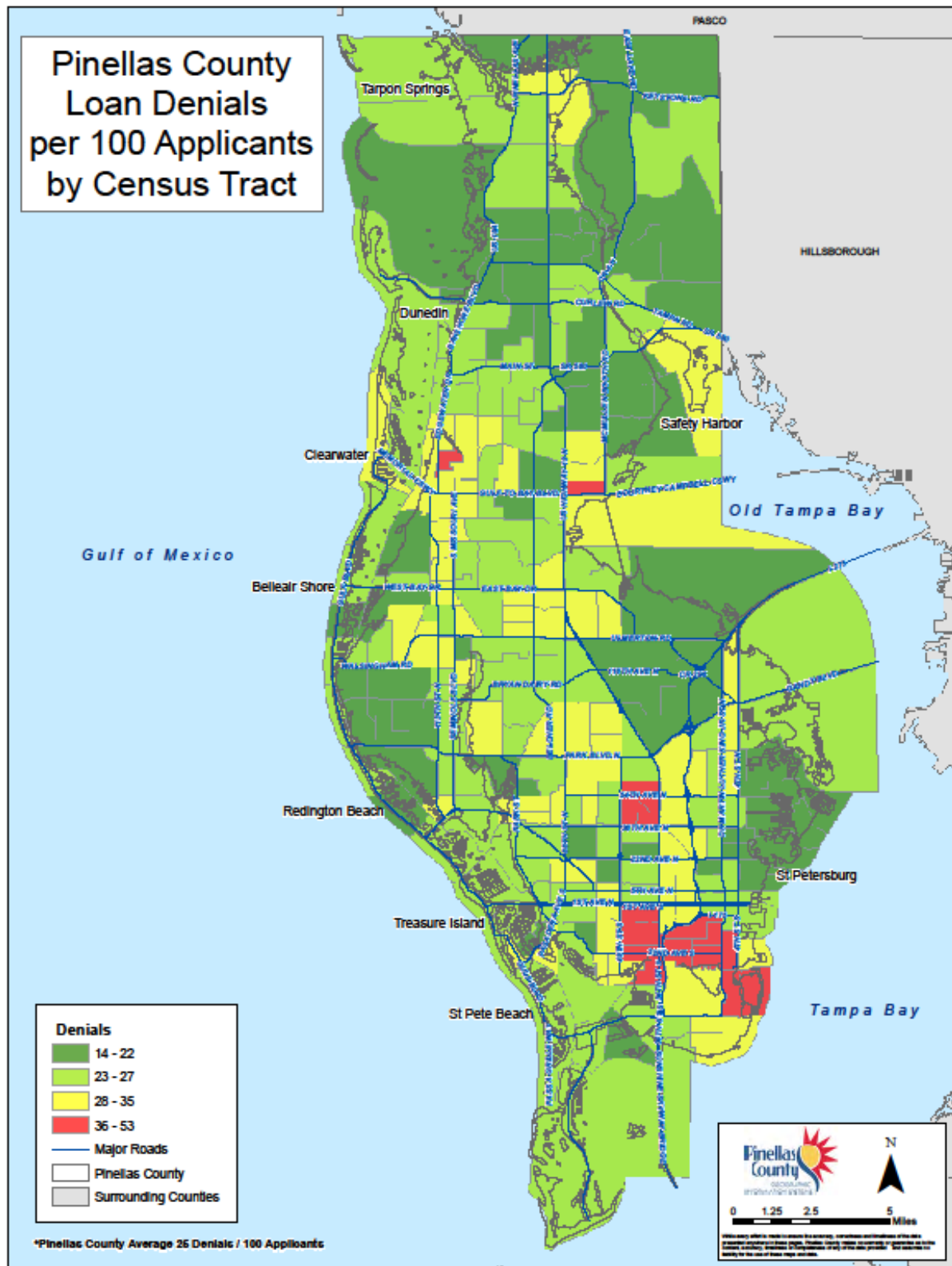
Chart 29: Originations by Applicant Income and Race (>=120 AMI)



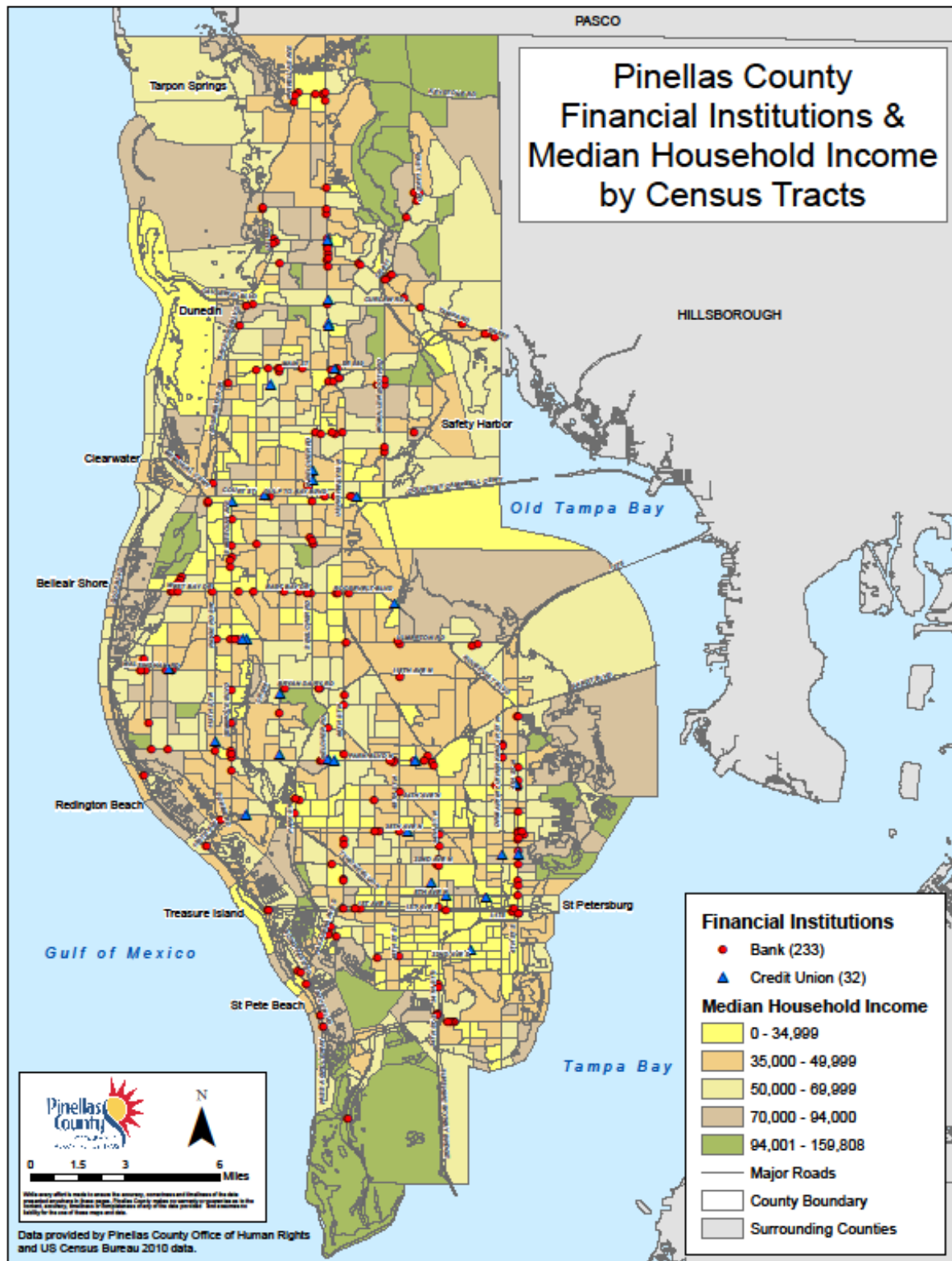
Map 9: All Applications by Census Tract Indexed to Population of Census Tract



Map 10: Loan Denials per 100 Applications by Census Tract



Map 11: Location of Credit Unions and Financial Institutions



Fair Housing Index

Introduction

The Fair Housing Index combines the effects of nine census tract variables from the 2013 American Community Survey (ACS) 5-Year estimates with the ratio of loan denials to originations from the Home Mortgage Disclosure Act (HMDA) database. The variables were standardized, summed, and the mean was used to classify census tracts by relative risk of impediments to fair housing choice. A map of the spatial distribution of risk provides an indication of where residents may experience various levels of housing discrimination or have problems finding affordable, appropriate housing.

Methodology

Data for nine variables were downloaded by 2010 census tract via the US Census Bureau's American FactFinder. The variables included were: percent minority (XMinority), percent female-headed households with children (FHHchild), median housing value (MedHous), median contract rent (MedRent), percent of the housing stock constructed prior to 1960 (P1960), median household income (MedHHI), percent of the population with less than a high school degree (LessHS), percent of the workforce unemployed (Unemploy), percent of the workforce dependent upon public transportation to go to and from work (PTrans). The ratio of loan denials to loan originations (DenOrg) for 2012 and 2013 from the HMDA data was also included. Pearson product-moment correlation coefficients were calculated to examine the association between the variables (see Table 16).

After examining the association between the variables, each variable was standardized by calculating a z-score for each variable. This converts all variables to the same unit of measure (i.e., standard deviations from the mean) to allow for mathematical manipulations of the variables. Each variable was then weighted, either positively or negatively, so the sum of variables at each census tract yielded a z-score reflecting the cumulative effect of negative factors. For example, in a fair housing environment, high minority concentrations raise suspicions that there may be problems relative to housing conditions and housing choices in the area based on correlations ($r=0.64$, $p<.01$) between percent of minorities and the ratio of loan denials to originations. Therefore, the percent minority variable would be given a positive value. Conversely, in areas of high median housing values, residents are less likely to have problems with fair housing choice ($r=-0.28$, $p<.01$). Median housing value, therefore, would be assigned a positive value. The mean of the standardized variables provided a means of identifying individual census tracts where fair housing choice is at higher risk due to factors most often associated with housing discrimination. With the data presented

in standardized form, the results can be compared to the standard normal distribution, represented by a bell curve with a mean of 0 and a standard deviation of 1. The results are summarized in the following section.

It should be emphasized that the data used to perform this analysis do not directly reflect fair housing violations. The data do provide, however, a measure of potential problems based on concentrations of socio-economic groups who most often experience restrictions to fair housing choice. Areas identified as having extreme problems are those where there is a high concentration of minorities, female-headed households, unemployment, high school dropouts, low property values, and, most likely, are areas where a large proportion of loans (conventional home mortgages, FHA or VA home mortgages, refinance, or home improvement) have been denied.

Findings

In Table 17, several correlations are worth noting. The following classification was used to characterize the correlations: $r = 0.70$ or higher = very strong relationship; 0.40 to 0.69 = strong relationship; 0.30 to 0.39 = moderate relationship; 0.20 to 0.29 = weak relationship and 0.01 to 0.19 = negligible relationship. Classification of correlations in this manner is useful; however, it is somewhat subjective.

There were strong correlations between percentage minority and the percentage unemployment, the percentage of female headed households with children, and percentage using public transportation, with correlations of 0.44 , 0.56 and 0.46 ($p < .01$) respectively. This means that minority communities had higher unemployment, higher number of female-headed households with children and greater reliance on public transportation to get to work than communities with lower concentrations of minorities. The percent minority had a moderate negative correlations with median household income ($r = -0.38$, $p < .01$), median rent ($r = -0.32$, $p < .01$) and median house value ($r = -0.30$, $p < .01$). The percentage of female headed households with children had a strong negative correlation with median household income ($r = -0.46$, $p < .01$) and median housing value ($r = -0.40$, $p < .01$), with a moderate negative relationships with median contract rent ($r = -0.30$, $p < .01$). This indicates that minorities and single mothers tend to earn lower incomes and live in lower valued housing. The loan origination variable, the ratio of denials to originations for all loan types, has a strong negative correlation to household income ($r = -0.40$; $p < .01$). This means that in areas with lower household incomes, there is a higher rate of denial compared with origination.

As indicated on Map 12, there are a greater number of higher risk census tracts concentrated in the southeastern census tracts of the Pinellas County, within the City of St. Petersburg. There

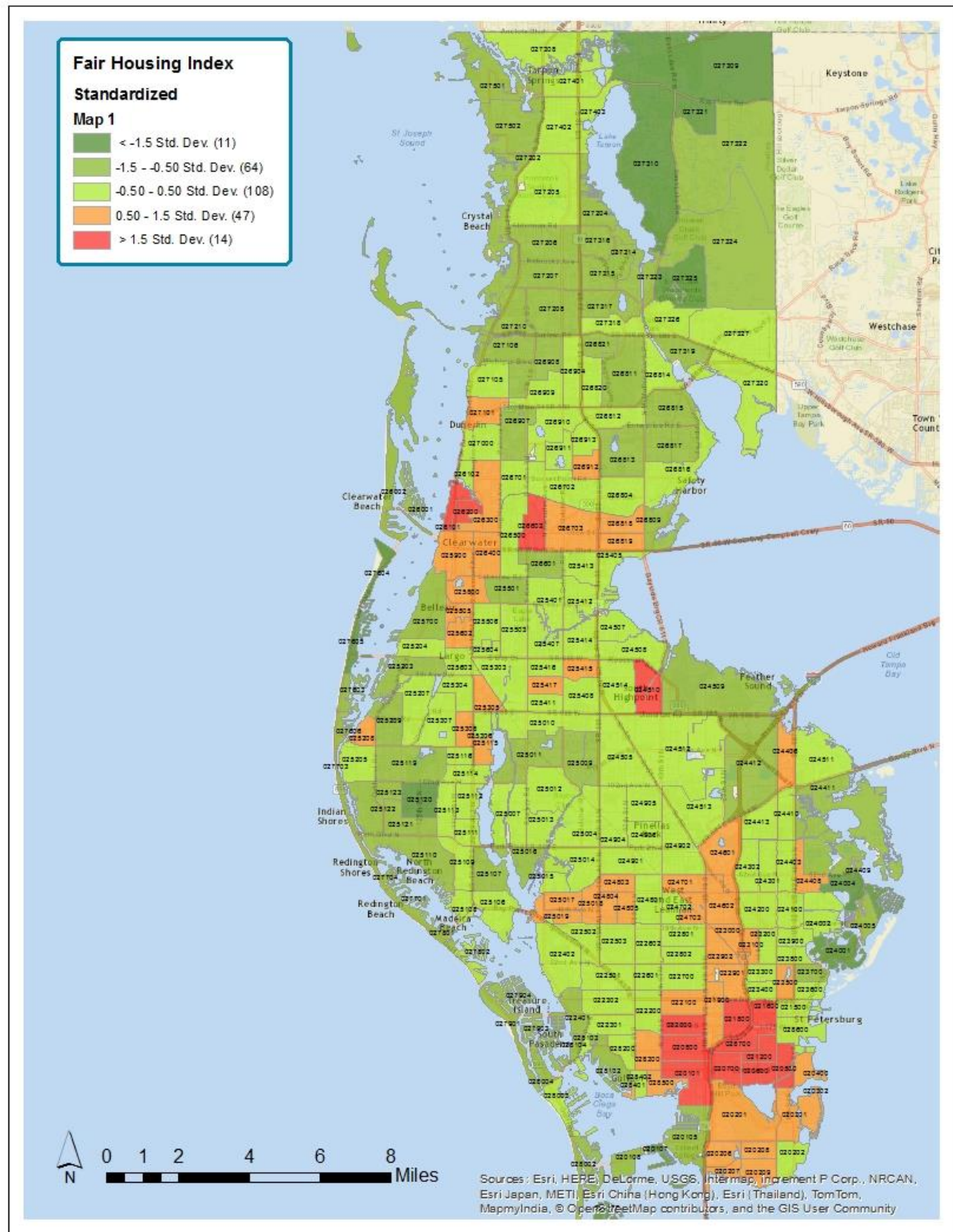
are some higher risk areas in Clearwater, Lealman, High Point and the central part of the County. These areas of concern are characterized by older, lower housing values and rents, and are primarily occupied by minority households that have higher percentages of households headed by females with children than other areas of the County. There is also a higher than average unemployment rate and lower than average level of educational attainment.

Table 17: Correlation Matrix for Variables Included in Fair Housing Index

	LessHS	MedHHI	Unemploy	FHHchild	PTrans	XMinority	MedRent	P1960	MedHous	DenOrg
LessHS	1									
MedHHI	-.236**	1								
Unemploy	.238**	-.453**	1							
FHHchild	.132*	-.456**	.354**	1						
PTrans	.267**	-.347**	.288**	.318**	1					
XMinority	.182**	-.382**	.441**	.563**	.455**	1				
MedRent	-.182**	.592**	-.406**	-.301**	-.233**	-.318**	1			
P1960	-.009	-.247**	.211**	.182**	.177**	.346**	-.311**	1		
MedHous	-.271**	.717**	-.348**	-.404**	-.192**	-.295**	.474**	-.142*	1	
DenOrg	.205**	-.395**	.390**	.398**	.460**	.640**	-.234**	.208**	-.278**	1

** . Correlation is significant at the 0.01 level (2-tailed).
 * . Correlation is significant at the 0.05 level (2-tailed).

Map 12: Dispersion of At-Risk Communities



Impediments to Fair Housing and Recommendations

This section utilizes the previously analyzed and discussed data to identify and discuss the impediments to fair housing choice. By synthesizing the information gathered, several impediments to fair housing choice in Pinellas County were evident. These impediments, along with the reasoning process, are described along with policy recommendations meant to address these issues directly.

Impediment: Areas of Discrimination

Discrimination as an impediment is evidenced through a few of our data sources and is experienced by a variety of protected class members.

A. Discrimination with regard to home mortgage loans.

Based on the Home Mortgage Disclosure Act (HMDA) data, the loan origination rate for applicants who are White is significantly higher than the loan origination rate for applicants who are non-White. No matter the type of loan, White origination rates are consistently higher than minorities. There is also evidence in the HMDA data to suggest that certain characteristics of redlining may be occurring in Pinellas County. Evidence shows that origination rates are influenced by location and value assigned to the property more so than the credit worthiness of the buyer. As the tract income increases, the origination rates of all the income groups increase. Due to the low number of applications in lower income tracts, a conclusive determination of redlining is not possible.

Recommendations

- Allocate County resources to examine and understand the reasoning for lower loan origination rates for minority groups as well as high income in a lower income tract.
- Allocate County resources to sustain and expand awareness of homebuyer opportunities to those in protected classes.
- Develop outreach program to educate financial institutions about our collective housing opportunities and credit counseling assistance to low- and moderate-income households.
- Allocate County resources to perform Fair Housing Rental and Mortgage Testing.

B. Discrimination of nationally and locally protected classes.

Based on the fair housing complaint data from October 2011 to June 2015, housing discrimination practices are an ongoing problem in Pinellas County. Complaints related to all nationally protected classes have been filed at the Pinellas County Office of Human Rights. Of the two

locally protected classes - sexual orientation and gender identity - the Pinellas County Office of Human Rights has had complaints filed based on sexual orientation. Discrimination in Pinellas County includes: denial of reasonable accommodation, imposition of different terms and conditions, harassment, refusal to rent, discriminatory advertising, denial of availability, making housing otherwise unavailable, refusal to sell, steering, denial of a reasonable modification, discriminatory financing, and discriminatory zoning.

Recommendations

- Allocate County resources to sustain and expand awareness, education, and training opportunities to landlords, property managers, and realtors; concerning national and local housing discrimination laws and policies, with a particular focus in the area of discrimination related to service animals.
- Improve presentation to housing providers regarding their obligations and responsibilities in the areas of reasonable accommodations for those with disabilities; including Home Owners Associations and Condominium Owners Associations, and other communal housing providers.
- Continue to ensure that all program participants and subrecipients do not discriminate against persons on the grounds of race, color, national origin, or sex in administering the CDBG program.

C. Competency in Fair Housing Policy

There is evidence to support that discrimination may be a fair housing issue at least in part due to lack of knowledge of fair housing laws. The survey conducted in conjunction with this project in part assessed the participants' familiarity with the various provisions of the law. The results indicated that familiarity in relation to protected classes and, more so, actions covered by the law could use improvement. The data related to complaints filed with the Pinellas County Office of Human Rights reveals that accommodation for disabilities is the single most cited issue in housing. This may indicate that this particular aspect of fair housing law is not as universally known as, for example, protections for the various classes. Another aspect related to this issue is regarding the population with Limited English Proficiency. As discussed, over 5 percent of Pinellas County's population speaks English "less than very well" and 16.4 percent households in which a language other than English is spoken are below the poverty level (ACS 2013). This points to the fact that the County may be failing to reach a portion of its residents, even when it does make efforts to expand knowledge of fair housing laws. Due to the language barrier some residents for whom housing affordability is an issue may be unaware of their rights and therefore more likely to become victims of discrimination and less likely to use avenues of recourse.

Recommendations

- Continue the County's efforts to proactively offer to persons who are Limited English Proficient (LEP) the availability of oral interpretation at public meetings and notices in languages other than English. Pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency, recipients of Federal financial assistance must ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination.
- Continue to offer Homebuyer Classes and Counseling in Spanish.
- Continue to ensure that all Fair Housing Marketing Plans and publications contain information advising persons of their rights under the Fair Housing Act; including the right to relocate to residences in the areas of non-minority concentration at their option; and referrals for minority persons to comparable and suitable decent, safe and sanitary replacement dwellings not located in areas of minority concentration.

Impediment: Areas of Limited Opportunity

One of the other impediments to fair housing identifiable via the analysis is the County's areas of limited opportunity. In essence certain portions of the County have a variety of factors which preclude their residents from being able to fully and freely choose their housing.

A. Transportation-Burdened Areas

In relation to highly concentrated areas of public housing and poverty, the East Tarpon Springs appears to be grossly underserved with only two north-south bus routes; one runs only once per hour along Alternate Route 19 (Route 66), and the other runs along U.S. Route 19 (Route 19) alternating between 15 and 20 minutes. Both bus routes include a short east-west route along Martin Luther King, Jr. Boulevard to Tarpon Mall, which is south of East Tarpon Road; however there is no east-west route north of East Tarpon Avenue forcing residents to walk up to one mile for bus service; or have inordinate wait times for work transportation for riders who live closer to Alternate Route 19. Although, hotels located in Clearwater Beach and St. Pete Beach, complement the PSTA schedules with shuttles and adjusted work schedules for housekeeping and other service personnel, this is also an area that could be served with earlier morning and late night stops.

Recommendations:

- Continue work and advocacy efforts with Pinellas Suncoast Transportation Authority to for alternative transportation modes, additional routes, and longer service times for existing routes in underserved areas.

B. Income Barriers

Employment opportunities and income have a significant impact on housing affordability and housing choice of residents. During the period 2009-2013, following the recession, the unemployment rate for Pinellas County was 10.2 percent or 46,881 of the civilian workforce; Africans Americans experienced an unemployment rate of 15.6 percent. Also as outlined in the Fair Housing Index, African American, female-head-of-householders who rely on public transportation tend to earn lower incomes and live in lower valued housing, and as a socio-economic group are likely to experience restrictions to fair housing. Additionally, of the mortgage loans originated, the moderate income category (80-120% area median income) had a lower success rate than of the low income category (50-80% area median income).

- Develop outreach program, in conjunction with childcare and transportation service providers, to identify specific areas of opportunity to improve access to these services. Continue to work with non-profits, educators and hiring professionals to ensure job readiness and training providers sponsor instructional classes and job fairs in African American communities.
- Continue to advocate and partner with developers to entice businesses to the area that provide new employment opportunities that match educational levels of the community.
- Continue to ensure that all vendors and contractors and employees paid with State and Federal funds are contractually obligated to affirmatively assure that minority business and women's business enterprises have an equal opportunity to compete for contracts, subcontracts, sources of supplies, equipment, construction and services.
- Continue to ensure that all project sponsors, vendors and contractors assure equal employment opportunity to all persons regardless of race, color, national origin, sex or disability for its CDBG-fund subrecipients.
- Allocate resources to research the reasons for lower loan origination rates in the moderate income category to adjust programmatic income requirements to provide access to funds for this group.

Impediment: Condition of Housing Stock

The housing stock in Pinellas County is fairly old with almost 60% of both owner housing and renter housing is over 35 years old; as a result of age, this housing becomes functionally obsolete in terms of layout, size, insulation, energy efficiency and electrical connectivity.

A. Age of Housing Stock

If renovations or maintenance to older homes is not performed, especially in low income areas due to cost, it is likely that owned homes will turn to rental units and eventually decline to create more slum and blighted communities.

- Continue providing affordable housing units for rent or home ownership through the use of Federal CDBG, HOME, ESG and NSP funds, State SHIP funds and local Housing Trust Funds. Current priorities include acquisition, construction and/or rehabilitation of new and/or existing owner, rental, homeless and special needs housing.
- Work to incentivize local developers to building new affordable units.
- Continue work in target areas, Greater Ridgecrest, Dansville and Highpoint to build new, affordable single family homes.

B. Access to Home Improvement Loans

Home Improvement loans have the lowest application and origination rate of the three loan purposes examined in this report, yet the condition of the housing stock is considered older than the national median average, and the majority of owner occupied housing is only two bedrooms.

- Research and develop programs that improve access and approval rates to loans used for home improvement.