



**Assessment of Fair Housing Report  
2016-2020**

**CITY OF FORT PIERCE, FLORIDA**  
Honorable Linda Hudson, Mayor

**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM**  
U.S. Department of Housing and Urban Development



## **Assessment of Fair Housing within the City of Fort Pierce, Florida**

The City of Fort Pierce  
2016-2020 Assessment of Fair Housing Report  
was produced by the  
Fort Pierce Department of Urban Redevelopment

For more information on the report, please contact  
Si necesita esta informacion en espanol, liame al:

City of Fort Pierce  
Department of Urban Redevelopment  
100 North U.S. Hwy. 1  
Fort Pierce, Florida 31950

772-467-3169  
[ewoodruff@city-ftpierce.com](mailto:ewoodruff@city-ftpierce.com)

City of Fort Pierce, Florida  
 Assessment of Fair Housing  
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**I. Cover Sheet**

1. Submission date: **August 15, 2016**
2. Submitter name: **City of Fort Pierce, Florida**
3. Type of submission: **Single Program Participant**
4. Type of program participant: **Consolidated Plan Participant**
5. For PHAs, Jurisdiction in which the program participant is located: **N/A**
6. Submitter members (if applicable): **N/A**
7. Sole or lead submitter contact information:
  - a. Name: **Libby Woodruff**
  - b. Title: **Manager**
  - c. Department: **Urban Redevelopment Department**
  - d. Street address: **100 North U.S. Hwy. 1**
  - e. City: **Fort Pierce**
  - f. State: **Florida**
  - g. Zip Code: **34950**
8. Period covered by this assessment: **2016-2020**
9. Initial, amended, or renewal AFH: **Initial**
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

Libby Woodruff      8-03-2016  
(Signature) (date)

12. Departmental acceptance or non-acceptance: \_\_\_\_\_  
(Signature) (date)

**Comments:**

## II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

This report is an update to the Analysis of Impediments to Fair Housing Choice report which was created for the City of Fort Pierce by Housing Opportunities Project for Excellence, Inc., in September, 2007.

The data presented in this 2016-2020 report was gathered from multiple sources, including meetings and interviews with staff and/or representatives of participating agencies, organizations and businesses, which were held between March 1-July 3, 2016. Public input was gathered through public meetings and a Fair Housing Survey, available in English and Spanish, which targeted citizens and key businesses and organizations. An advertised public comment period and public hearings were held during regularly-scheduled Fort Pierce City Commission meetings. Excerpts from the St. Lucie County HOME Consortium Analysis of Impediments to Fair Housing Choice, published March, 2014 and the Regional Analysis of Impediments to Fair Housing (RAI) for Indian River, Martin, St. Lucie, Palm Beach, Miami-Dade and Monroe Counties, published in 2013 were also used throughout this report.

This analysis included review and analysis of data pertaining to the HUD programs being utilized within the City of Fort Pierce as well as a study of fair housing choice in Fort Pierce using the following methods:

1. Data analysis and mapping of key demographic, income, employment and housing information;
2. Review of housing discrimination complaints filed with federal and state agencies; and
3. Interviews and meetings with representatives of public, private and nonprofit organizations who are knowledgeable about local housing issues.

Existing comprehensive documents were also reviewed during the creation of this report. Some of these included:

- 2011-2015 5-Year CDBG Consolidated Plan
- 2011-2015 Consolidated Annual Performance and Evaluation Reports (CAPERs)
- 2015 CDBG Annual Action Plan
- City of Fort Pierce 2007 Analysis of Impediments to Fair Housing Choice
- City Zoning and Development Code
- City of Fort Pierce Website
- St. Lucie County Website
- St. Lucie County HOME Consortium Analysis of Impediments to Fair Housing Choice, published March, 2014
- Regional Analysis of Impediments to Fair Housing (RAI) for Indian River, Martin, St. Lucie, Palm Beach, Miami-Dade and Monroe Counties, published in 2013
- United States Census and American Community Survey
- St. Lucie County Comprehensive Plan

Some of the resources used to compile background data on the City of Fort Pierce are listed below.

SECTION	VARIABLE	DATA SOURCE
Demographics	Population totals and density age	2010 Census SF1; Shimberg Center US Census; HUD Geospatial Data
Segregation	Race and Ethnicity	2010 Census SF1; Shimberg Center US Census; HUD Geospatial Data
Housing	Tenancy; Cost Burdon	ACS 2010-2014; Shimberg Center US Census; HUD Geospatial Data
Poverty	Family Poverty Rate / Poverty By Race & Ethnicity	ACS 2010-2014; Shimberg Center US Census; HUD Geospatial Data
Labor and Commuting	Unemployment; Labor Force Participation Rate; Commute Time; Commute Mode	ACS 2010-2014; Shimberg Center US Census; HUD Geospatial Data

- Data was also collected at the census tract. Data displayed within maps utilizes census tract level data to show, in detail, the spatial relationship and patterns of variables within the City of Fort Pierce.
- Much of the data used in this report was taken from the American Community Survey 2010-2014 estimates. Where census 2010 data was available it was used in place of ACS data to alleviate concerns about sampling error.

Populated Census Tracts	
	Number of Populated Census Tracts
City of Fort Pierce	14
St. Lucie County	45

- **Lending Profile** - Lending data for this report was retrieved from the University of Florida Housing Data Clearing House. Racial lending data and overall 2014 lending data within the City and for the State of Florida were analyzed to identify disparities and trends in lending patterns by race, ethnicity. The data used in this analysis is from the year 2014.

The intent of this update is to:

- Evaluate and update data used in the 2007 report;
- Review impediments that were identified in that report to determine if the impediments still exist;
- Review what actions have been taken and evaluate the effectiveness of the actions taken;
- Identify any new impediments that may exist; and
- Recommend actions to address any new identified or continuing impediments to fair housing choice.

Impediments to fair housing choice are any actions, omissions, or decisions:

- Taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or
- Which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex disability, familial status, or national origin.

## **2007 Impediments to Fair Housing Choice**

The following were identified as impediments to fair housing choice or barriers to affordable housing in the City of Fort Pierce 2007 Analysis of Impediments to Fair Housing Choice Report:

1. Discrimination in housing against classes of persons protected under the fair housing laws.
2. Lack of awareness of rights and responsibilities under fair housing laws.
3. A strongly-segregated housing market
4. A severe shortage of affordable housing
5. Racial disparities in fair and equal lending

## **2016 Impediments to Fair Housing Choice**

### **Impediment #1 – Housing/Lending Discrimination on the basis of Race, Color, National Origin, Religion, Sex, Familial Status and Disability**

Housing complaints based on discrimination against disability ranked the highest, with racially-based complaints ranking second. Disability is the largest alleged discriminating factor in fair housing complaints.

The data gathered on the lending patterns in the City of Fort Pierce supports this finding, with the data also indicating regular disparities on loan approvals and denials by race and by Hispanic/non-Hispanic ethnicity.

### **Recommended Actions to Address Impediment #1:**

The City of Fort Pierce will take the following actions to raise public awareness on this issue.

1. Forward all Fair Housing complaints that are received directly to HUD for investigation.
2. Continue to promote and provide First Time Homebuyer Workshops in partnership with the Martin and St. Lucie County Home Buyer Consortiums.
3. Make referrals for credit counseling when needed to help improve credit ratings for homeownership potential.
4. Allocate CDBG funding to offset the costs associated with at least two (2) yearly Fair Housing Workshops and the dissemination of Fair Housing promotional materials on TV, website, mail-outs, and posters, at meetings, symposiums, and housing events, in English and Spanish.
5. Continue running HUD-approved Fair Housing commercials on the City's Public Access channels, in English and Spanish.
6. Request the local newspapers print HUD-approved Fair Housing Notices, in English and Spanish in the real estate section. The City is served by Scripps Treasure Coast newspaper and *Hometown News*.
7. Provide HUD's Fair Housing Complaint Forms (in English and Spanish) at public buildings and local libraries.
8. Provide Fair Housing information to all Lending Consortiums within the area.
9. Promote partnerships to strengthen Fair Housing educational opportunities with individual members of the St. Lucie and Martin County Lending Consortiums.
10. Provide Fair Housing education on and address reports of "Redlining" and "Reverse Redlining" - Redlining is the practice of denying or increasing the cost of services such as banking, insurance, access to jobs, access to health care, or even supermarkets to residents in certain, often racially determined, areas.

"Reverse redlining" is a term often used to describe situations where a lender or insurer particularly targets minority consumers, not to deny loans or insurance to them, but rather to charge them more than would be charged to a similarly situated majority consumer.

11. Promote ways for citizens to report lending discrimination complaints with HUD by contacting the National Discrimination Hotline on 1-800-669-9777 (voice), 800-927-9275; completing a complaint form on the HUD website at [www.hud.gov/fairhousing](http://www.hud.gov/fairhousing); and/or allowing us to provide assistance to send a letter to our local HUD office.

### **Impediment #2 – Shortage of Affordable / Decent Housing Opportunities**

The Fort Pierce Housing Authority reported that there were approximately 8,997 applicants on the Section 8 Housing Choice Voucher Waiting List and approximately 1,593 applicants on the Public Housing Units Waiting List. The most recent 2016 data reports that there are now 827 public housing units in the City of Fort Pierce.

The Housing Authority of the City of Fort Pierce (FPHA) Section 8 Housing Choice Voucher Waiting List is currently closed. It was last open for three days in May, 2015. There is no notice of when the Waiting List will reopen.

### **Recommended Actions to Address Impediment #2:**

1. During 2016-2020, introduce a resolution for the City of Fort Pierce for inclusionary housing. Inclusionary housing is an affordable housing tool that links the production of affordable housing to the production of market-rate housing. Inclusionary housing policies produce affordable housing by requiring new residential developments to include a certain percentage of affordable housing units. The resolution could also give local governments the ability to establish a construction excise tax on developments to increase funding for affordable housing development.
2. During 2016-2020, continue to use CDBG funds, as available, to reduce the cost of housing for low-income households. Examples of this includes partnering with the Fort Pierce Utilities Authority, Indiantown Nonprofit Housing Agency and the Centro Campesino organization and using CDBG funds and funding from the City of Fort Pierce's General Fund to provide weatherization assistance for homeowners to decrease their utility bills.
3. During 2016-2020, continue allocating State Housing Initiatives Partnership (SHIP) funds to rehabilitate owner-occupied homes.
4. Continue allocating State Housing Initiatives Partnership (SHIP) funds to provide down payment and closing cost assistance for lower-income citizens wanting to purchase a home.
5. During 2016-2020, continue to provide education and outreach to realtors, developers, banks and non-profit organizations that provide or develop affordable housing.
6. During 2016-2020, work with lenders to provide lender fair housing training by the City or in conjunction with existing programs.
7. During 2016-2020, continue allocating CDBG funding, as available, to act as a 'cash match' for the Fort Pierce Housing Authority's application for tax credits to rehabilitate an old abandoned hospital into a living facility for lower income senior citizens. The Housing Authority has applied for the tax credits four (4) times. The City allocated the CDBG funds several years ago and will continue to support the Housing Authority through this endeavor.
8. During 2016-2020, continue to seek ways to assist developers and all of those

involved in affordable housing in locating land, grants, and loans and by providing technical assistance to encourage the development of affordable housing and compliance with fair housing laws. All executed agreements with affordable housing providers will include the requirements of equal opportunity and fair housing laws.

9. During 2016-2020, the City should continue to pursue fair housing enforcement over the long term by identifying regional partners with similar interests, develop support for fair housing services available to multiple regions and jurisdictions at a shared cost, and help establish a private fair housing center to carry out education and enforcement programs designed to further fair housing throughout the Fort Pierce area.
10. During 2016-2020, the City should continue to assess and improve, where necessary the enforcement of current codes for landlord maintenance of property. This could include exploring ways to improve the rental maintenance by landlords and property owners through code/legislation updates or incentive programs such as increased fines for habitual violators or economic incentives for landlords to better maintain their properties and increase the number of green buildings.
11. During 2016-2020, the City should continue to explore ways to increase the amount of affordable housing throughout the City, including examining ways to increase the amount of housing stock that is barrier free and ADA compliant, especially of rental single-family housing units in older neighborhoods built before the Americans with Disability Act was enacted. The City should consider approaching landlords and property managers to discuss possible solutions to this issue.

### **Impediment #3 – Lack of Knowledge, Awareness of, or Education on Fair Housing Protections**

This impediment was found to be the most common one within the City of Fort Pierce. Many potential homeowners lack the understanding of the path to homeownership, and a majority of loan denials are due to avoidable issues, such as incomplete loan applications, unverifiable information and collateral.

#### **Recommended Actions to Address Impediment #3:**

1. During 2016-2020, provide at least two Fair Housing Workshops during each program year; feature information on types of discrimination, 'redlining', 'reverse redlining', sub-prime, high-cost loans, protected classes, how to file a fair housing complaint, etc.;
2. During 2016-2020, promote and provide at least four First Time Homebuyer Workshops during each program year;
3. During 2016-2020, provide Fair Housing Complaint Forms in English and Spanish – throughout each program year;
4. During 2016-2020, provide Fair Housing information to lending consortiums throughout area throughout each program years;
5. During 2016-2020, request the local newspapers print HUD-approved Fair Housing Notices, in English and Spanish in the real estate section once each quarter during program years;
6. During 2016-2020, provide HUD-approved Fair Housing commercials on the City's Public Access television channel, in English and Spanish throughout program years;
7. During 2016-2020, publish Fair Housing information in non-profit community newspapers throughout the program years, in English and Spanish;

8. During 2016-2020, provide Fair Housing brochures, posters, etc. at all City-sponsored events and at City Hall;
9. During 2016-2020, we will continue updating the fair housing webpage on the City of Fort Pierce website;
10. During 2016-2020, the Fort Pierce City Commission will proclaim April of each year Fair Housing month; display Fair Housing posters throughout City Hall; and
11. During 2016-2020, forward all Fair Housing complaints that are received directly to HUD for investigation.

**Impediment #4 – Fair and Equal Lending Disparities**

The data gathered on the lending patterns in the City of Fort Pierce supports this finding, with the data indicating regular disparities on loan approvals and denials by race and by Hispanic/non-Hispanic ethnicity. As the data indicates, African Americans and Hispanics tend to have higher loan application failure rates when HMDA lending data is analyzed by race and ethnicity.

**Recommended Actions to Address Impediment #4:**

The most prevalent reason for loan application denials in the City of Fort Pierce is the loan applicant’s collateral. The second leading reason for loan denials is the debt-to-income ratio, and the third reason is incomplete applications.

The City will take the following actions to increase public awareness and promote homebuyer education on these issues:

1. During 2016-2020, work with all members of St. Lucie County and Martin County Lending Consortiums to increase awareness of prevalent denial issues.
2. During 2016-2020, continue to provide referrals to credit counseling agencies to improve credit ratings, and debt-to-income ratios, for homeownership potential.
3. During 2016-2020, continue to provide promotional information for First-Time Homebuyer Workshops through public access venues.
4. During 2016-2020, promote and/or hold at least two (2) Fair Housing / Homeowner educational events each year.
5. During 2016-2020, promote financial literacy educational events within the City of Fort Pierce.
6. During 2016-2020, provide down payment and closing cost assistance to first-time homebuyers through the State Housing Initiatives Partnership (SHIP) program.

**Impediment #5 – Housing Market Segregation**

As in many locations in Florida, historical geographical segregation areas still exist within the City of Fort Pierce. Continued activities that are geared toward creating neighborhoods that are more open and inclusive have been and will continue to be established through Fair Housing training in the community to housing related industries.

**Recommended Actions to Address Impediment #5:**

The City of Fort Pierce will take the following actions to raise public awareness:

1. During 2016-2020, continue activities that are geared toward creating neighborhoods that are more open and inclusive, including our ‘creative placemaking initiative’, that includes self-guided cultural history trails and events that are advertised across the United States, commercial façade improvement grants, beautification projects, art shows and family-friendly festivals, etc., in our lower-income minority historic neighborhoods;

2. During 2016-2020, continue collaborations with investors and the Allegany Franciscan Ministries organization and provide land and incentives for the construction new grocery, retail, and banking businesses in our lower-income segregated neighborhoods;
3. During 2016-2020, continue collaborations with investors, developers and St. Lucie County to develop artist live/work areas in our lower-income minority historic neighborhoods;
4. During 2016-2020, work with the local Board of Realtors and Lending Consortium promoting Fair Housing education and continued education on lending practices.
5. During 2016-2020, work with local Affordable Housing Advisory Committee (AHAC) to promote ways to enhance local land development regulations to augment fair housing. Presently, the City of Fort Pierce has adopted the following items:
  - a. Expedited Permit Reviews – All affordable housing developments receive priority review and processing.
  - b. Listing of vacant City-owned property available for development as affordable housing.
  - c. Review of proposed regulations (prior to adoption) for their impact on affordable housing.

### **III. Community Participation Process**

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

Prior to the City adopting the Analysis of Impediments to Fair Housing Choice Report, the following actions were taken:

**Citizen Participation Plan** – The City updated its Citizen Participation Plan to include the process for creation and adoption of the AFH Report, per HUD’s Memorandum dated March 14, 2016, ‘Incorporating 24 CFR Part 5, Affirmatively Furthering Fair Housing into 24 CFR 91.10 Consolidated Program Year, 24 CFR 91.105 Citizen Participation Plan for Local Governments and 24 CFR 91.115 Citizen Participation Plan for States.’ The City provided a draft of the amended Citizen Participation Plan in English and Spanish with a 30-day citizen review and comment period, advertised in a local publication, on the public service access TV channel, and in the local Hometown News newspaper, in English and Spanish.

A public presentation and public hearing was held during a regularly-scheduled City Commission meeting on May 2, 2016, followed by an additional public hearing and the City Commission’s approval of Resolution #16-R21, approving the amendments to the Citizen Participation Plan on May 16, 2016. English and Spanish versions of the Citizen Participation Plan are available in hardcopy for review at Fort Pierce City Hall, through the U.S. Mail upon request and also on the City’s website.

**Public Notice** - The City published the Consolidated Plan and the AFH Report in a manner that afforded citizens, businesses, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments, including:

- a. A public presentation announcing the availability of the Community Needs Assessment and Fair Housing surveys, in English and Spanish, was presented, along with an overview of the creation of the AFH Report and 5-Year Consolidated Plan on March 21 and April 4, 2016 at regularly-scheduled City Commission meetings. Advertisements in English and Spanish, announcing the availability of Community Needs Assessment and Fair Housing Surveys were publicized in the Hometown News newspaper on April 8, 2016, in Hispanics for Action on the Treasure Coast newsletter, on May 12, 2016, in the Lincoln Park Main Street newsletter in April, 2016, and on the City's public access television station from April 8 through July 11, 2016.
- b. Community presentations on the 5-Year Consolidated Plan and AFH creation were advertised, in English and Spanish and held January 13 at a regularly-scheduled Communitywide Council (CWC) meeting, on January 2 at the Percy Peek Gymnasium in the Lincoln Park neighborhood, on January 26 at Fort Pierce City Hall on June 16 at the offices of Community Based Development Organization Lincoln Park Main Street, on June 23 at Fort Pierce City Hall and on July 13 at a regularly-scheduled Communitywide Council meeting at Fort Pierce City Hall. Each presentation was followed by distribution of English and Spanish versions of the Community Needs Assessment and Fair Housing surveys. Volunteers often picked up extra copies of the English and Spanish surveys following the meetings and distributed them door-to-door throughout our historic neighborhoods. Hardcopies of the English and Spanish Community Needs Assessment and Fair Housing surveys were distributed through the Police Athletic League Community Center, Lincoln Park Main Street and via numerous supportive service agencies throughout the City. A large display was set up in the foyer at Fort Pierce City Hall encouraging people to complete the surveys, which were available on the front counter.
- c. Availability of the Community Needs Assessment and Fair Housing surveys were also promoted through a newspaper article in the St. Lucie News Tribune on April 12, 2015. Notifications in English and Spanish of the availability of the surveys were also included as an electric bill insert through the Fort Pierce Utilities Authority in the April, 2016 utility bills and in the Hometown Newspaper, in English and Spanish.
- d. The Fort Pierce Community Needs Assessment Survey (CNAS) and the Fair Housing Survey were made available to the public in two (2) formats – for businesses/supportive service organizations and for citizens - in English and in Spanish. The surveys were distributed utilizing the computer-based tool, SurveyMonkey.com and in hardcopy via U.S. Mail upon request and through the various other venues described above.
- e. Urban Redevelopment staff conducted one-on-one interviews related to community needs and fair housing issues in Fort Pierce with numerous realtors, housing agencies, St. Lucie County Community Services, and other supportive service organizations between April 15 and July 1, 2016.
- f. Three (3) public hearings were provided during the development of the AFH Report. The first public hearing was held following a presentation on the creation of the Report on April 4, 2016, during the beginning of the process, to garner public comment and to promote the availability of the English and Spanish Community Needs Assessment and Fair Housing surveys. The other two (2) public hearings were held July 5 and August 1, 2016, during regularly-scheduled City Commission meetings.

- g. Interested parties had more than thirty days to examine the draft AFH and 5-Year Consolidated Plan, in English and in Spanish, prior to its submission to the City Commission for approval and proper resolution.
- h. The City encouraged citizen input at any time during the planning and creation period for the AFH Report. Any citizen comments made were duly noted in this report under Citizen Comments. Final results of the Fair Housing Survey are also included in the Consolidated Plan and AFH Report, in the Appendices section.  
Any citizen complaints presented verbally were answered at the time presented. Any complaints received in writing were answered within thirty working days from the date the complaint was received. All such comments, complaints, objections and responses have been summarized and attached to the Consolidated Plan and Analysis of Impediments to Fair Housing Report in their respective Appendices.

The process used to develop Fort Pierce's 5-Year Consolidated Plan and Analysis of Impediments to Fair Housing Report complies with Part 24 Section 91- 200 of HUD Regulations which requires interaction among private citizens, various local, county and state businesses and agencies concerned with housing and social services, non-profit and for-profit housing providers and other members of local institutions involved in the delivery of housing.

- 2. Provide a list of organizations consulted during the community participation process. Interviews were conducted in-person, via telephone and through a web-based survey with organizations, agencies and individuals serving the Fort Pierce area, some of which included:

Fort Pierce Housing Authority	Harbor Community Bank
St. Lucie County Council on Aging	Save Our Children, Inc.
St. Lucie County Community Services	In the Image of Christ, Inc.
St. Lucie County Community Transit	Meals on Wheels of the Treasure Coast
TD Bank	St. Lucie County Lending Consortium
Harbor Federal Savings Bank	Martin County Lending Consortium
Chase Bank	Seacoast National Bank
BB&T Bank	PBC Credit Union
Bank of America	Centerstate Bank
Bank Atlantic	Grand Bank & Trust of Florida
Harbor Federal Savings Bank	Health Services – St. Lucie County Public Schools
PNC Bank	St. Lucie County Health Department
Florida Community Bank	Fort Pierce Magnet School Of The Arts
SunTrust Bank	Virginia College
Wells Fargo Bank	Multicultural Resource Center for Children & Families, Inc.
Riverside National Bank	Treasure Coast Food Bank, Inc.
Bank United	Children Services Council of St. Lucie County
Oculina Bank	The Salvation Army
First Peoples Bank	Mustard Seed Ministries
Southern Commerce Bank	Habitat for Humanity
Indian River State College	World Changers
Realtors Association of St. Lucie	Council on Aging of St. Lucie
Florida Department of Elder Affairs	Florida Rural Legal Services

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

Our efforts to elicit meaningful community participation were well received. Although no comments were received during the three (3) public hearings, we did receive comments during the public presentations/meetings, and also received more than 400 Fair Housing and Community Needs Assessment surveys. Overall, we believe the community participation was acceptable and that we were successful in informing

the community of the availability of the Community Needs Assessment and Fair Housing surveys. We believe we were also successful in relaying explanations on Fair Housing and potential Fair Housing issues in Fort Pierce, were able to garner support for future Fair Housing workshops and relayed ways for citizens to report housing discrimination, if needed.

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

Summary of Key Verbal Comments Received During Community Workshops/ Presentations, Public Hearings and Fair Housing Surveys:

**Affordable Housing:** Increasing rents, coupled with low vacancies have made it difficult to find affordable rental units. Some felt that landlords use the strong market to discriminate among potential renters.

**Information on Affordable Housing Discrimination:** Some comments were made regarding the lack of information on tenant rights, such as when landlords asked for immigration documents. Residents did not know where to get help when discriminated against.

**Mothers with Children:** A common comment was the difficulty of families, especially mothers with children, in finding housing.

**Overcrowding:** This issue was discussed by both residents and property managers.

**Special Needs Housing:** Comments were received pertaining to the need for affordable rental housing units for seniors, persons with disabilities, and veterans.

All comments and views were accepted.

To supplement the community meetings and to assist in further understanding the fair housing issues within the City of Fort Pierce, Fair Housing Surveys in English and Spanish were made available to residents at City Hall, online via the City's website, via hardcopy through U.S. Mail, through distribution by supportive service agencies, door-to-door distribution, and were promoted through the April, 2016 utility bill insert.

Following is an overview of the Fair Housing Survey results:

- 100% of respondents completed the survey in English.
- 57% of respondents indicated that they have encountered housing discrimination; of those, 88% felt landlord/property managers were responsible.
- 82% of the discrimination occurred in rental property situations.
- One-half of those indicated discrimination felt it was because of family status (families with children).
- Over 90% indicated that they did not report the discrimination incident.

#### **IV. Assessment of Past Goals, Actions and Strategies**

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

Following is a list of fair housing goals that were identified in the City of Fort Pierce Analysis of Impediments to Fair Housing Report that was published in September, 2007:

**Goal #1** – Increase knowledge of fair housing rights and responsibilities to reduce incidence of discrimination in housing.

**Goal #2** – Increase affordable housing opportunities.

**Goal #3** – Eliminate disparities in lending practices.

- a. Discuss what progress has been made toward their achievement;
- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)

The last AFH Report was published by the City of Fort Pierce in 2007 by the Department of Community Development. That Department was disbanded in 2010 and replaced by the Department of Urban Redevelopment. The Department of Urban Redevelopment manager and four staff were laid off in 2013. The City's Grants Administrator continued working in the Department of Urban Redevelopment through March, 2016, when she was appointed Manager of the department. The Department now consists of the Manager and one staff, an Executive Assistant, who were tasked with creating a current AFH and the 5-Year Consolidated Plan for program years 2016-2020, which will all be submitted to HUD in August, 2016.

- Based on extensive research through the electronic files belonging to the previous Department of Community Development and Urban Redevelopment departments, as well as 2011-2015 Consolidated Annual Performance and Evaluation Reports (CAPERs), 2011-2015 5-Year CDBG Consolidated Plan and 2015 CDBG Annual Action Plan, following is an overview of the activities accomplished toward achieving the goals set forth in the 2007 AFH Report:

**2007-2008** - Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:

*The City provided \$969,050 in down payment assistance and closing cost to thirty-five (35) households to purchase homes throughout the city. Seven (7) households received rehabilitation assistance at a cost of \$366,637 and disaster mitigation repairs were provided to seventeen (17) households at a cost of \$64,167. Funds were funded by the State of Florida through the State Housing Initiatives Partnership (SHIP) and Hurricane Housing Recovery (HHR) programs. In addition, the replacement one-for-one program, funded with state funds, reconstructed ten (10) homes at a cost of \$470,268 with HOME Again funds, and two (2) for \$208,498 with Hurricane Housing Recovery funds. The city in its provision of housing assistance does not discriminate against a person on the basis of race, color, religion, ancestry, age, sex, marital status, place of birth, handicap, or national origin.*

*Consumer Credit Counseling Services conducted twelve homeownership counseling workshops. The workshops rotated between the cities of Fort Pierce and Port St. Lucie and St. Lucie County during fiscal year 2007. The city is a member of the St. Lucie County Lending Consortium and participates in all fair housing activities and requires that all persons who apply for homeownership assistance through the SHIP program attend the workshops. Fair housing activities are discussed thoroughly and the pamphlet titled "Fair Housing It's Your Right" provided to the city by the U.S. Department of Housing and Urban Development, Fair Housing Division is distributed to each attendee.*

**2008-2009** – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:

*The City provided \$2,815,360 in purchase assistance and/or closing cost to forty-seven (47) households to purchase homes throughout the city. Ten (10)*

received rehabilitation assistance at a cost of \$465,483 and disaster/hazard mitigation repairs were provided to eight (8) household at a cost of \$44,055. Funds were funded by the State of Florida through the State Housing Initiatives Partnership (SHIP) and Hurricane Housing Recovery (HHR) programs. In addition, the replacement one for one CDBG disaster recovery program, funded by the Department of Community Affairs, reconstructed one (1) home at a cost of \$120,275, substantially rehabilitated three (3) homes at a cost of \$104,406, and provided \$82,000 in down payment and closing costs to two (2) households. The city in its provision of housing assistance does not discriminate against a person on the basis of race, color, religion, ancestry, age, sex, marital status, place of birth, handicap, or national origin.

Consumer Credit Counseling Services conducted twelve homeownership counseling workshops. The workshops rotated between the cities of Fort Pierce and Port St. Lucie and St. Lucie County during fiscal year 2008. The city is a member of the St. Lucie County Lending Consortium and participates in all fair housing activities and requires that all persons who apply for homeownership assistance through the SHIP, HHR, and CDBG Disaster programs attend the workshops. Fair housing activities are discussed thoroughly and the pamphlet titled "Fair Housing It's Your Right" provided to the city by the U.S. Department of Housing and Urban Development, Fair Housing Division is distributed to each attendee.

**2009-2010 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, city employees, and the general public and housing providers	Provide workshops, seminars, media campaigns and other outreach activities	One advertisement regarding Fair Housing was placed in the local paper in English and Spanish
Goal 3	Support pre-purchase counseling programs	City supported monthly housing counseling workshops which distributed HUD-generated information on fair housing	63 recipients from City of Fort Pierce attended the workshops during the program year

**2010-2011 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, City employees, and the general public and housing providers	Provide workshops, seminars, media campaigns and other outreach activities  Promote fair housing on City website.	<ul style="list-style-type: none"> <li>The City placed an advertisement in Spanish and English promoting Fair Housing in the local paper.</li> <li>The City's website contains a fair housing informational brochure.</li> </ul>
Goal 2	Increase number of affordable homes in higher-income areas.	Applied for funding through US HUD to replace Euclidean zoning codes with Form-based codes in six (6) historic districts	(If funding is awarded) affordable housing opportunities will increase by 30% in higher-income neighborhoods.
Goal 3	Support pre-purchase counseling programs	Support monthly 1 <sup>st</sup> Time Homebuyer Workshops which distribute HUD-generated information on fair housing	98 Fort Pierce citizens registered and 63 attended 1 <sup>st</sup> Time Homebuyer Workshops during the program year.
Goal 3	Provide predatory lending information to citizens.	Provide "Don't Be a Victim of Loan Fraud" brochures published by the US Department of HUD at information desk in Department of Urban Redevelopment	Disseminated 100 brochures encouraging citizens to protect themselves from predatory lenders.

**2011-2012 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, City employees, and the general public and housing providers	- Provide workshops, seminars, media campaigns and other outreach activities - Promote fair housing on City website.	Fair Housing brochures and signage prominently displayed and available in City Hall lobby. Fair housing information posted on City website.
Goal 2	Increase number of affordable homes in higher-income areas.	Will re-apply for funding through US HUD to replace Euclidean zoning codes with Form-based codes in six (6) historic districts in 2013	(If funding is awarded) affordable housing opportunities will increase by 30% in higher-income neighborhoods.
Goal 3	Support pre-purchase counseling programs	Support monthly 1 <sup>st</sup> Time Homebuyer Workshops which distribute HUD-generated information on fair housing	103 Fort Pierce citizens registered and 72 attended 1 <sup>st</sup> Time Homebuyer Workshops during the program year.
Goal 3	Provide predatory lending information to citizens.	Provide “Don’t Be a Victim of Loan Fraud” brochures published by the US Department of HUD at information desk in Department of Urban Redevelopment	Disseminated 200 brochures through the Department of Urban Redevelopment to enlighten citizens on predatory lenders.

**2012-2013 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, City employees, and the general public and housing providers	- Provide workshops, seminars, media campaigns and other outreach activities - Promote fair housing on City website.	Fair Housing brochures and signage prominently displayed and available in City Hall lobby. Fair housing information posted on City website.
Goal 2	Increase number of affordable homes in higher-income areas.	Re-applying for funding through US HUD to replace Euclidean zoning codes with Form-based codes in six (6) historic districts.	(If funding is awarded) affordable housing opportunities will increase by approximately 30% in higher-income neighborhoods.
Goal 3	Support pre-purchase counseling programs	Support monthly 1 <sup>st</sup> Time Homebuyer Workshops which distribute HUD-generated information on fair housing	Six (6) First-Time Homebuyer Workshops were held during PY2012. 150 citizens attended. 4 Lending Consortium meetings were held during PY2012.
Goal 3	Provide predatory lending information to citizens.	Provide “Don’t Be a Victim of Loan Fraud” brochures published by the US Department of HUD.	Disseminated approximately 250 brochures to encourage citizens to protect themselves from predatory lenders.

- Attended Fair Housing Seminars/Workshops in Orlando, Florida in 2/2013.

**2013-2014 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, City employees, and the general public and housing providers	- Provide workshops, seminars, media campaigns and other outreach activities - Promote fair housing on City website.	Fair Housing brochures and signage are prominently displayed and available in City Hall lobby. Fair housing information is posted on City website.
Goal 2	Increase number of affordable homes in higher-income areas.	Working with Habitat for Humanity to identify and rehabilitate foreclosed and abandoned homes in higher-income areas.	Have identified three (3) homes for potential rehabilitation by Habitat for Humanity.
Goal 3	Support pre-purchase counseling programs	Support monthly 1 <sup>st</sup> Time Homebuyer Workshops which distribute HUD-generated information on fair housing	Six (6) First-Time Homebuyer Workshops were held during PY2013. 123 citizens attended. Three (3) Lending Consortium meetings were held during PY2013.
			Referred numerous citizens to the Treasure Coast Homeless Services Council, Inc., (TCHSC) who provided Housing Counseling services for 195 households.
Goal 4	Provide predatory lending information to citizens.	Provide “Don’t Be a Victim of Loan Fraud” brochures published by the US Department of HUD.	Disseminated approximately 200 brochures to encourage citizens to protect themselves from predatory lenders.

**2014-2015 – Consolidated Annual Performance Evaluation Reports (CAPER) excerpts:**

Goal	Activity	Action	Measurable Results
Goal 1	Provide fair housing information to elected officials, City employees, and the general public and housing providers	- Provide workshops, seminars, media campaigns and other outreach activities - Promote fair housing on City website.	Fair Housing brochures and signage are prominently displayed and available in City Hall lobby and in the Urban Redevelopment Department Fair housing information, including videos, are posted on City website.
Goal 2	Increase number of affordable homes in higher-income areas.	Working with Habitat for Humanity to identify and rehabilitate foreclosed and abandoned homes in higher-income areas.	Referred Habitat for Humanity of St. Lucie County to four (4) potential homes needing rehab in higher income areas.
Goal 3	Support pre-purchase counseling programs	Support monthly 1 <sup>st</sup> Time Homebuyer Workshops which distribute HUD-generated information on fair housing	Four (4) First-Time Homebuyer Workshops were held during PY14. 53 citizens attended. Four (4) Lending Consortium meetings were held during PY14.
			Referred numerous citizens to the Treasure Coast Homeless Services Council, Inc., (TCHSC) who provided Housing Counseling services for St. Lucie County residents.
Goal 4	Provide predatory lending information to citizens.	Provide “Don’t Be a Victim of Loan Fraud” brochures published by the US Department of HUD.	Disseminated approximately 100 brochures to encourage citizens to protect themselves from predatory lenders.

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

Additional actions could include:

1. The implementation of a fair housing educational program designed to increase understanding of fair housing and the dynamics of the local housing market among home seekers (buyers and renters) and housing industry stakeholders. This could be accomplished by providing education to home seekers through additional fair housing workshops and distribution of informative flyers at City-sponsored events;
2. Continuous updates to the fair housing webpage on the City of Fort Pierce website. The page currently contains information on fair housing, links to fair housing laws and other resources, including instruction on filing a fair housing complaint; and
3. Provide Q & A on how to file a Fair Housing complaint, and provide simple directions on how to file a complaint regularly in local news publications and neighborhood English and Spanish newsletters.

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

The research of past activities toward reaching the goals set in the 2007 Analysis of Impediments to Fair Housing Report reflect that the previous goals have been partially met and should be maintained, as well as increased as we work to implement the goals set forth in the 2016 AFH, including:

- Work with lenders to provide lender fair housing training by the City or in conjunction with existing programs.
- Define and align the roles of other City departments on fair housing issues.

## V. Fair Housing Analysis

### A. Demographic Summary

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

Fort Pierce is a city in and the county seat of St. Lucie County, Florida, United States. It is also known as the Sunrise City, sister to San Francisco, California, the Sunset City. As of 2013, the population recorded by the U.S. Census Bureau was 43,601. Fort Pierce is named after the army installation of Fort Pierce built in the area in 1838 during the Second Seminole War.

The city has approximately 16,49 households. Following are demographics of the City's population, taken from AFFHT Table #1:

Race/Ethnicity	(Fort Pierce, FL CDBG) Jurisdiction	
	#	%
White, Non-Hispanic	14,422	34.16
Black, Non-Hispanic	16,754	39.68
Hispanic	9,889	23.42
Asian or Pacific Islander, Non-Hispanic	349	0.83
Native American, Non-Hispanic	104	0.25
Other, Non-Hispanic	79	0.19

**Racial or Ethnic Disproportion Needs** – According to Hudexchange.org, 64.37% of the total population in Fort Pierce is African American or one or more races other than white, more specifically persons of Hispanic, Asian or Pacific Islander, Native American or non-Hispanic descent. Although data sources, such as the U.S. Census Bureau's American Community Survey (ACS), do not provide specific statistics regarding the housing conditions by race, the African American/Hispanic communities generally represent a large percentage of families that occupy substandard housing, overcrowding or live below the poverty level.

Three primary categories of race and ethnicity are discussed in this analysis (White, African American, and Hispanic/Latino). These three categories account for the large majority of all persons living within the City of Fort Pierce. It is important to note that, people of Hispanic origin may be any race. In analyzing equitable access to fair housing, understanding the relationship of race and ethnicity to other relevant variables is fundamentally important.

Within the City of Fort Pierce, the population is spread out with 25.9% under the age of 18, 7.0% from 20 to 24, 13.3% from 25 to 34, 13.0% from 45 to 54, 9.8% from 55 to 64 and 6.8% who were 65 years of age or older. The median age was 35.2 years. For every 100 females there are 97.4 males. For every 100 females age 18 and over, there are 94.9 males.

The median income for an individual in the city is \$25,976, and the median income for a family is \$30,583. Males had a median income of \$32,412 versus \$26,349 for females. The per capita income for the city is \$16,479. 35.9% of the population is below the poverty line.

The table below reflects the income level percentages for all types of households in Fort Pierce, comparing 2009 data to 2014 data, published by the U.S. Census American Community Survey. This data represents both owner-occupied and renter-occupied housing units.

	<b>Households (2009)</b>	<b>Households (2014)</b>	<b>Families (2009)</b>	<b>Families (2014)</b>
<b>Total</b>	<b>15,207</b>	<b>16,249</b>	<b>9,515</b>	<b>9,743</b>
Less than \$10,000	13.2%	18.3%	10.9%	15.7%
\$10,000 to \$14,999	8.7%	10.5%	6.2%	7.2%
\$15,000 to \$24,999	18.2%	19.6%	17.2%	18.8%
\$25,000 to \$34,999	13.7%	14.1%	13.2%	13.4%
\$35,000 to \$49,999	18%	13.9%	18.3%	15.3%
\$50,000 and above	28.4%	10.8%	34.1%	12.8%
<b>Median Income \$\$</b>	<b>31,598</b>	<b>25,976</b>	<b>36,584</b>	<b>30,583</b>

Source: American Community Survey 5-Year Estimates 2010-2014 Income in the Past 12 Months, Fort Pierce

The number of households that speak English is approximately 75%. Of those that speak a language other than English, Spanish is by far the most prevalent at 20% followed by French Creole at 6.2%.

**Disabled** – AFFHT Table #1 lists 12,119 disabled persons within the City limits of Fort Pierce. Of those, 35.7% of those are 65 years and older and 13% is 18-64 years old. Some of the housing difficulties that the disabled face are accessible housing for in-home care, wheel chair and walker accessibility, living conditions for visually impaired/blind and hearing impaired persons, the inability to climb stairs and developmentally disabled needs.

**Education** – 2015 ACS estimates 59.7% of the population attained degrees at or beyond high school. 12.7% of persons over the age of 18 have bachelor’s degrees or higher.

The City of Fort Pierce is located in the St. Lucie County School District. The total District enrollment for Fall 2015 was 36,650. 73.66% of the students participate in the free or reduced lunch program. This means that three students out of four are living at or near poverty levels. This extreme level raises concerns about the academic challenges that go along with teaching children who live in poverty.

### **St. Lucie County School District – 2015-2016 Enrollment**

<b>Total Enrollment</b>	<b>36,650</b>
American Indian/Alaskan Native	1.6%
Asian	2%
Black	30%
Hispanic	29%
Multi-Racial	4%
White	36%

The Agriculture and Labor Program , Inc. (ALPI) Head Start Program, one of two (2) departments under the Children and Family Services Division, provides services in seven (7) directly operated centers and seven (7) contracted locations in St. Lucie County.

ALPI also serves as the Grantee Agency for Head Start Services in St. Lucie County. In 1978, ALPI received initial funding to serve 160 Head Start children. Today, the Head Start Program has grown to serve over 571 children. In 2000, ALPI's Early Head Start application was approved to serve 40 infants and pregnant mothers in St. Lucie County. Also in 2000, DHHS/ACF approved ALPI's grant application to serve an additional 119 children. Today, ALPI serves 731 children in its Head Start/Early Head Start program.

**Income and Employment** – The median household family income in Fort Pierce is \$30,583, compared to the State of Florida, which is \$55,774. The estimated income levels of households by percentage are:<sup>1</sup>

Number of households with income	<\$10,000 – 25.2% (4,228)
	\$10k-\$20k – 20.1% (3,365)
	\$20k-\$30k – 14.3% - (2,400)
	\$30k-\$40k – 11.6% (1,938)
	\$40k-\$50k – 8.7% - (1,452)
	\$50k-\$60k – 3.6% - (597)
	\$60k-\$75k – 5% - (835)
	\$75k-\$100k – 5% - (836)
	\$100k-\$125k – 1.6% - (272)
	\$125k-\$150k – 2.1% - (346)
	\$150k-\$200k – 1.8% - (309)
	>\$200k – 1.2% - (198)

According to the 2015 American Community Survey (ACS), the majority of households in Fort Pierce (52.7%) or 17,405 people have income through earnings. The ACS also lists 31.8% of families in Fort Pierce have income below the poverty level. Of this 31.8%, 55.4% of these families have a female head of household with no husband present and 68.9% were households with children under the age of 18.

According to the U.S. Bureau of Labor Statistics, the total civilian labor force in the Port St. Lucie Statistical Area (MSA), which includes Fort Pierce for 2015, was 131,820. As of March, 2016, the unemployment rate in Fort Pierce is 6.5%, compared with the State of Florida, which is 4.7%.

The major employment areas with the highest number of jobs are computer and mathematical occupations, architecture and engineering occupations, life, physical and social service occupations, education, training and library occupations, arts, design, entertainment, sports and media occupations, healthcare occupations, protective service occupations, personal care and service occupations, building and grounds cleaning and maintenance occupations, and farm, fishing and forestry occupations.

The highest hourly wage rates in the Port St. Lucie Statistical Area (MSA), which includes Fort Pierce, were found in the management of companies and enterprises (\$47.92/hour). The lowest median hourly wage rates were found in accommodation and food services (\$8.05/hour).

<sup>1</sup> [city-data.com/income/income-Fort-Pierce-Florida.html](http://city-data.com/income/income-Fort-Pierce-Florida.html)

A summary of the number of persons employed by the top 20 employers in St. Lucie County is shown on the next table:<sup>2</sup>

COMPANY NAME	EMPLOYEES	PRODUCT / SERVICE
School Board of St Lucie County	5,416	Education
Indian River State College	2,400	Higher education
Lawnwood Regional Med Cntr & Heart Inst	1,339	Healthcare services
Walmart Distribution Center	890	Dry goods distribution center
Blue Goose Growers / Construction	400	Agriculture / Contractors
City of Fort Pierce	335	City government
Pursuit Boats	318	Boat manufacturer
Tropicana Products Inc.	295	Fruit juice manufacturer
Maverick Boat Company	275	Boat manufacturer
Fort Pierce Utilities Authority	268	Utilities
USDA, US Horticultural Research Lab	220	Agricultural research
A-1 Roof Trusses	189	Truss manufacturer
Southern Eagle Distributing	163	Beer distributor
FAU's Harbor Branch Oceanographic Inst	150	Research organization
Waste-Pro	108	Waste disposal
Natalie's Orchid Island Juice Company	85	Fruit juice manufacturer
Silver-Line Plastics	80	Manufacturer plastic pipes
Southern Truss Company	70	Truss manufacturer
JJ Taylor Distributing Florida, Inc.	66	Beer distributor

According to Sperling's Best Places, the projected job growth rate for Fort Pierce over the next 10 years is 37.8%, compared to the United States, which is projected to grow 36.10%.<sup>3</sup>

The overall cost of living in Fort Pierce is reasonable and below the national average. Overall, the cost of living in Fort Pierce is 80.7% of the average cost of living in the United States.<sup>4</sup> Included in this comparison are good and services such as grocery items, housing, utilities, transportation, health care, and miscellaneous goods and services.

**Labor Force and Commuting** - This section examines the labor force participation rate as well as basic commuting trends by citizens of Fort Pierce. The labor force participation rate is a representation of the proportion of the city's population in the labor force. This includes both employed and unemployed (job-seeking) civilians, 16 years and over as well as members of the US Armed Forces. Conversely, those not in the labor force includes all people 16 years old and over who are not accounted for by the labor force participation rate. These are typically students, retired workers, homemakers, institutionalized people and

<sup>2</sup> [http://youredc.com/site\\_selection/major\\_employers](http://youredc.com/site_selection/major_employers)

<sup>3</sup> [www.bestplaces.net/economy/city/florida/fort\\_pierce](http://www.bestplaces.net/economy/city/florida/fort_pierce)

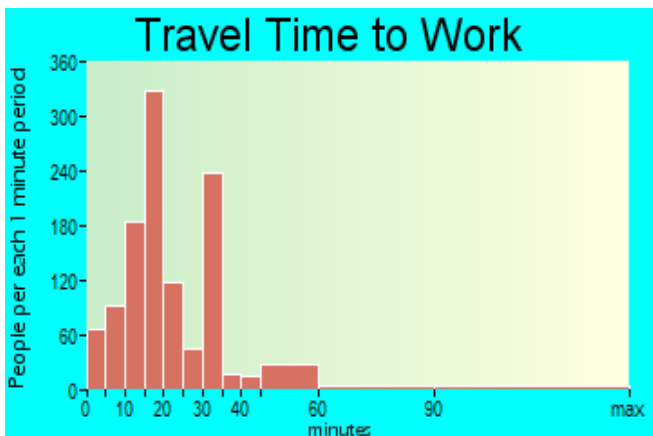
<sup>4</sup> [www.bestplaces.net/cost\\_of\\_living/city/florida/fort\\_pierce](http://www.bestplaces.net/cost_of_living/city/florida/fort_pierce)

people doing incidental unpaid family work. The City of Fort Pierce’s labor force participation rate is 54.9%, compared to the 64.3% in the United States.

Commuting trends may seem out of place in a fair housing assessment, but commuting patterns are directly reflective of the relationship between housing and jobs. To understand commuting trends in this section we summarize mean travel time to work by mode of travel, mode of travel by tenure, and mode of travel by race/ethnicity. Mean travel time to work is measured in minutes and represents the average travel time that workers usually took to get from home to work.

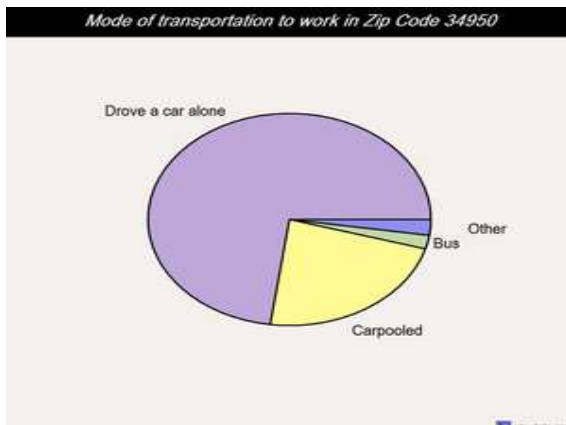
The travel time also accounts for time spent waiting for public transportation, as well as for picking up carpool passengers. Mode of travel refers to the method of transportation used to get from home to work. High travel times may indicate an imbalance between jobs and housing. Similarly the relationship between tenure and transportation mode can inform the type of transportation options that should be readily available to certain demographics.

The data indicates that Fort Pierce area individuals utilizing public transportation options have higher average travel times to work. And in the city, more renters use public transit than homeowners. The same is true of minorities in comparison to white persons. Overall there is a staggering difference between those that drive alone and those that use public transportation only. **This all indicates that efficient public transportation options are lacking throughout the City of Fort Pierce.**



### Travel time to work (commute)

- Less than 5 minutes: 284
- 5 to 9 minutes: 400
- 10 to 14 minutes: 802
- 15 to 19 minutes: 1,439
- 20 to 24 minutes: 512
- 25 to 29 minutes: 191
- 30 to 34 minutes: 1,040
- 35 to 39 minutes: 73
- 40 to 44 minutes: 62
- 45 to 59 minutes: 346
- 60 to 89 minutes: 110
- 90 or more minutes: 110



### Means of transportation to work

- Drove a car alone: 3,930 (73%)
- Carpooled: 1,226 (23%)
- Bus or trolley bus: 110 (2%)
- Bicycle: 37 (1%)
- Walked: 32 (1%)
- Other means: 34 (1%)
- Worked at home: 27 (1%)

City Data.Com – Fort Pierce

**Poverty** - The Census Bureau identifies poverty thresholds according to the composition of the household; different types of households (by age and size) have different poverty thresholds. Since poverty is defined at the family level and not the household level, the poverty status of the household is determined by the poverty status of the householder.

“Population below poverty level” refers to the sum of people in families and the number of unrelated individuals identified as poor. We summarize individual poverty rates by race/ethnicity and age. The family poverty rate distinguishes between families with children under the age of 18, which is then further divided into various household types including married couples below the poverty level and single female householders below the poverty level.

For the City of Fort Pierce, poverty is a great concern. In total, there are over 14,889 people below the poverty level – 31.8% of the total population located in the Fort Pierce City area. On average, 57.4% of all families with children under the age of 18 are below the poverty level.

Poverty is clearly linked to race and ethnicity throughout the city. While the predominant race throughout the city is white, proportionally there are about half as many white people in poverty in comparison to both African American and Hispanic populations. Finally, our analysis identifies single female householders with children as especially in need. In the City of Fort Pierce, 64.2% of all single-female households with children are below the poverty level.

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends overtime.

The following chart shows the difference in the number of housing units based on whether they are occupied by owners or renters.<sup>5</sup> These trends have remained constant overtime.

<b>Place</b>	<b>Owner-occupied Housing Units</b>	<b>Renter-occupied Housing Units</b>
Fort Pierce South	1,294	557
Fort Pierce North	1,541	805
Fort Pierce	7,375	8,908

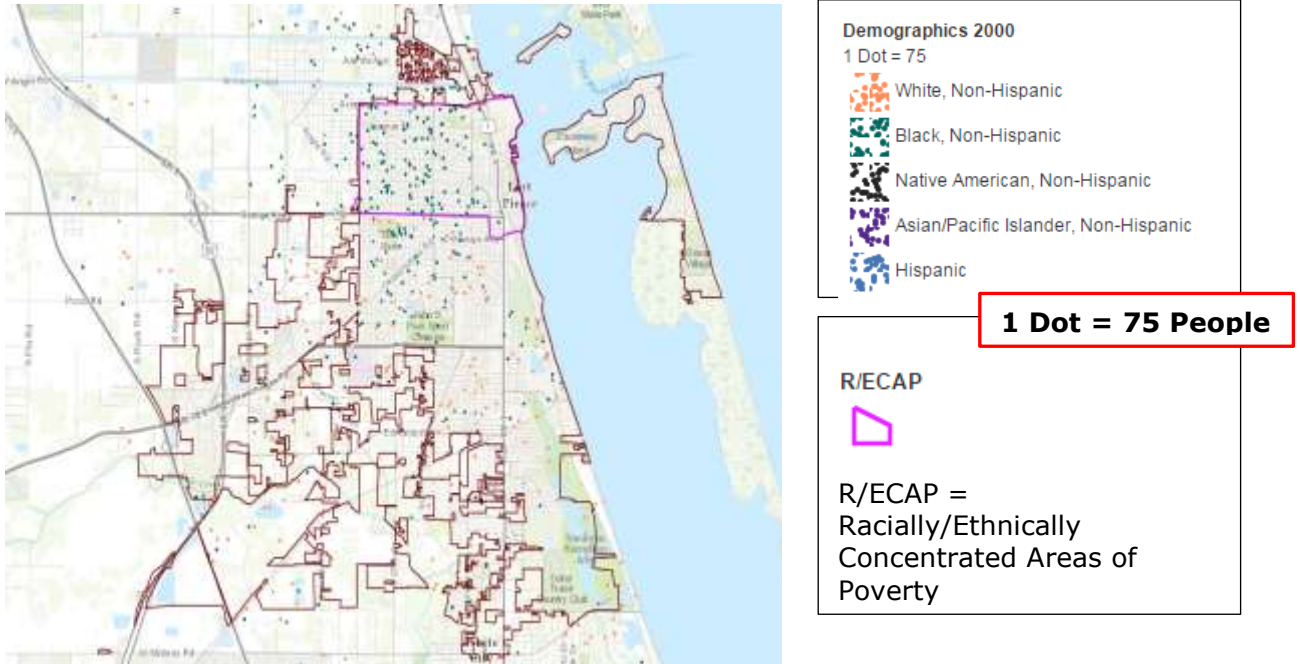
<sup>5</sup> <http://www.towncharts.com/Florida/Housing/Fort-Pierce-South-CDP-FL-Housing-data.html>

## B. General Issues

### 1. Segregation/Integration

#### a. Analysis

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



As shown in the map above, taken from HUD’s AFH Housing Data, and the chart below, Fort Pierce North has the highest concentration of segregation, with the highest concentration of Black/Non-Hispanic residents.

#### R/ECAP = Racially/Ethnically Concentrated Areas of Poverty

R/ECAP Demographics	Fort Pierce, FL Jurisdiction		Port St. Lucie, FL Region	
	#	%	#	%
Total Population in R/ECAPs	15,089	-	18,389	-
White, Non-Hispanic	1,774	11.76	3,141	17.08
Black, Non-Hispanic	10,106	66.98	10,983	59.73
Hispanic	2,848	18.87	3,872	21.06
Asian or Pacific Islander, Non-Hispanic	77	0.51	88	0.48
Native American, Non-Hispanic	44	0.29	49	0.27
Other, Non-Hispanic	29	0.19	31	0.17

2. Explain how these segregation levels have changed over time (since 1990).  
These segregation levels have not changed significantly over time.
3. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

As shown in the map listed under #1 on the previous page, Fort Pierce North shows the highest level of segregation within the City. The R/ECAP Demographic chart under #1 also shows a breakout of the high segregation by race/ethnicity. This area has the highest level of segregation in the City of Fort Pierce, with African Americans being the predominant group living in the segregated area.

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

Place	Owner-occupied Housing Units	Renter-occupied Housing Units
Fort Pierce South	1,294	557
Fort Pierce North	1,541	805
Fort Pierce	7,375	8,908

Due to the City of Fort Pierce being a 'destination' for 'Snow Birds' – winter visitors who reside here approximately six (6) months each year to escape the cold winters in the Northern United States - the City as a whole has lots of rental property. The majority of the area's rental properties are located in integrated areas; however, as the chart above shows, a significant amount of rental properties are located in Fort Pierce North, a highly segregated area.

5. Discuss how patterns of segregation have changed over time (since 1990).

According to *An Equity Profile of the Southeast Florida Region*, published by PolicyLink and PERE, (which includes Fort Pierce) racial/ethnic groups are becoming more integrated. According to the dissimilarity index provided by PolicyLink, which estimates the share of a given racial/ethnic group that would need to move to a new neighborhood to achieve complete integration, segregation has declined significantly in Fort Pierce between all groups since 1990.<sup>6</sup>

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

Housing development approvals have a great impact on fair housing choice. If the higher income areas of Fort Pierce do not allow increased levels of affordable housing, particularly rental housing, protected classes will become more highly concentrated and segregated thereby further limiting housing choice.

A majority of households in the protected class categories rent, however, affordable rental opportunities are limited to a few areas within the City of Fort Pierce. Consequently, low income and poverty households in protected classes have become more concentrated due to

<sup>6</sup> <https://dornsife.usc.edu/assets/sites/242/docs/se-florida-april-2014.pdf>

limited housing choice. The consequences are particularly harmful to children, affecting their schools, social environment and health.

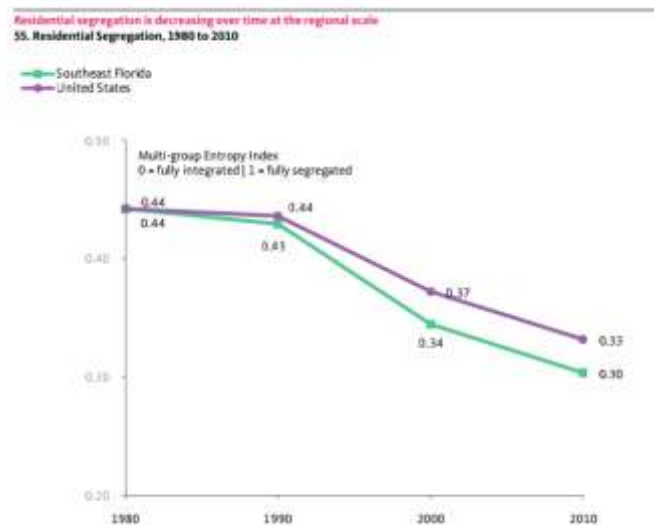
Lack of home sale price diversity can also impede fair housing choice. The lack of price diversity affects housing choice for lower income households and leads to a higher concentration of protected classes due to affordability of homes.

**b. Additional Information**

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

According to PolicyLink and PERE's *An Equity Profile of the Southeast Florida Region*:<sup>7</sup>

- Residential segregation has been declining over the past few decades, though neighborhoods are still not racially integrated.
- People of color are over five times as likely as whites to live in the region's very high poverty neighborhoods.
- Many of the neighborhoods with the highest shares of people of color also have the longest commutes and the highest rates of carelessness.
- More of Southeast Florida's residents pay too much for housing than in any other of the largest 150 metros, and people of color have the highest housing burdens.
- Southeast Florida is less segregated by race/ethnicity than the nation, and segregation has steadily declined over time as the region has become more diverse.



The dissimilarity index shown above illustrates how, despite the positive trend, segregation remains. Six out of every ten whites would need to move to achieve integration with blacks or Hispanics. And six out of every ten blacks would need to move to achieve integration with Hispanics.

According to the Regional Analysis of Impediments to Fair Housing, published by Carras Community Investment, Inc., in 2013, the most cited impediments of fair housing choice in St. Lucie County/Fort Pierce is housing/lending discrimination on the basis of being a member of a

<sup>7</sup> <https://dornsife.usc.edu/assets/sites/242/docs/se-florida-april-2014.pdf>

protected class. The impediment, stating that it occurs when, on the basis of a person being part of a protected class, lenders deny or alter services or access to housing through actions such as denying property insurance to applicants, conducting property appraisals in a discriminatory manner or by setting different terms or privileges in the sale of a dwelling, among other actions.<sup>8</sup>

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

Place-based disparities play a major role in perpetuating inequality within the City of Fort Pierce. Plenty of research over the past few decades confirms the damaging effects of concentrated poverty, as well as the central role of racial discrimination in perpetuating harmful, multigenerational exposure to localized risks such as violence and other sources of stress and trauma.

Even after four decades since the passage of the Fair Housing Act, nearly half of African-American children live in neighborhoods with poverty rates over 30% and around 1/5 of all Americans live in areas with very limited access to good jobs, quality housing, a clean environment, healthy food, and opportunities for physical activity.

For the City of Fort Pierce, one of our strategies must be to confront the underlying patterns of neighborhood disadvantage. Place-based investments should be a central component of this strategy.

**Mobility.** The City's public transportation system plays an important role in connecting its segregated communities to jobs and other economic opportunities located throughout the region. By coordinating transportation investments with housing, education, and economic development investments, the area can more effectively revitalize neighborhoods and reduce concentrated poverty, segregation, and housing and transportation burdens.

Mobility strategies that expand access to high-opportunity areas for low-income families and racial minorities are important, and also deserve the attention of the City of Fort Pierce. Allowing deep neighborhood resource disparities to persist is unsustainable. The City must seek to identify and invest in place-based strategies.

### **c. Contributing Factors of Segregation**

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

- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Crime in segregated neighborhoods

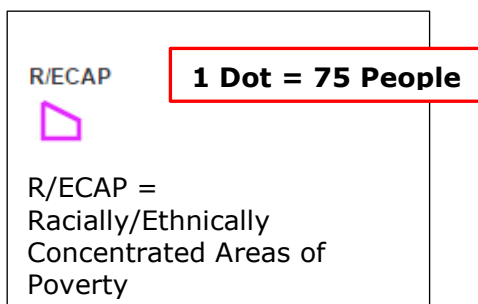
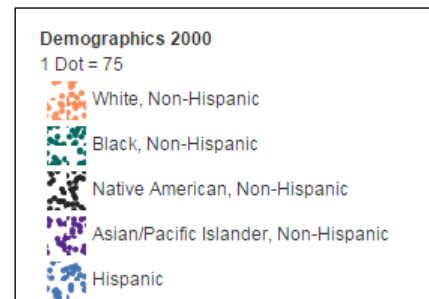
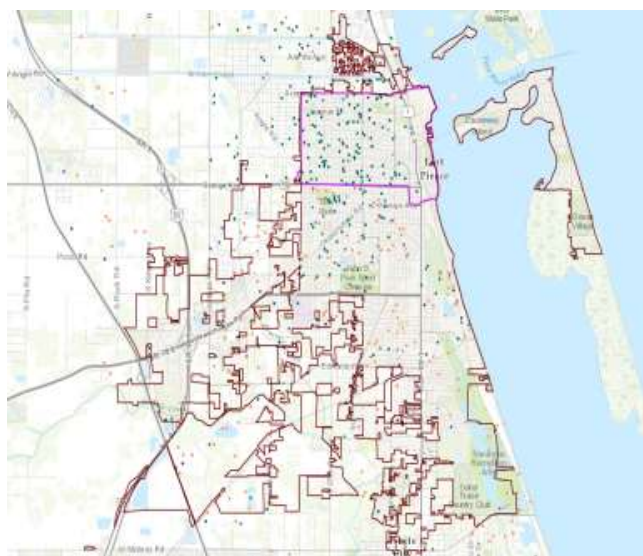
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<sup>8</sup> <http://designxstudio1.wix.com/carras#!projects/cee5>

## 2. R/ECAPs - Racially/Ethnically Concentrated Areas of Poverty

### a. Analysis

1. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.



As shown in the map above taken from HUD's AFH Housing Data, Fort Pierce North has the highest concentration of segregation, with the highest concentration of Black/Non-Hispanic residents. R/ECAP = Racially/Ethnically Concentrated Areas of Poverty.

2. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

R/ECAP Demographics	Fort Pierce, FL Jurisdiction		Port St. Lucie, FL Region	
	#	%	#	%
Total Population in R/ECAPs	15,089	-	18,389	-
White, Non-Hispanic	1,774	11.76	3,141	17.08
Black, Non-Hispanic	10,106	66.98	10,983	59.73
Hispanic	2,848	18.87	3,872	21.06
Asian or Pacific Islander, Non-Hispanic	77	0.51	88	0.48
Native American, Non-Hispanic	44	0.29	49	0.27
Other, Non-Hispanic	29	0.19	31	0.17

As shown in the chart taken from HUD's AFH Housing Data above, Fort Pierce North has the highest concentration of segregation, with the highest concentration of Black/Non-Hispanic residents. R/ECAP = Racially/Ethnically Concentrated Areas of Poverty.

3. Describe how R/ECAPs have changed over time (since 1990).  
Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) do not seem to have changed very much over time (since 1990).

## **b. Additional Information**

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

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) are driving the City of Fort Pierce's population growth, and the ability of the R/ECAPs to thrive is central to the City's economic success now and in the future.

Despite strong growth overall, high unemployment and low wages have plagued the R/ECAPs. Wide racial gaps in income, health, and opportunity – along with declining wages, a shrinking middle class, and high inequality – also place the City's economic future at risk.

Equitable growth is critical for the City's prosperity. By creating good jobs, connecting youth and vulnerable workers located in our R/ECAPs to training and career pathways, and increasing access to economic opportunities located throughout the area, the City of Fort Pierce and St. Lucie County leaders can put all residents on the path toward reaching their full potential, and secure a bright economic future for Fort Pierce.

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

Please see the answer to Number B/2 on page 26 of this report.

## **c. Contributing Factors of R/ECAPs**

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

- Deteriorated and abandoned properties
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing
- High crime in R/ECAP areas

Within the City of Fort Pierce, R/ECAP areas tend to be neighborhoods of low-valued homes with a high proportion of minority renters and homeowners. These areas of high concentrations of minority residents also tend to be in areas of only low- to mid-level access to opportunity.

With more affordable housing options in the city, these concentrations of poverty and minority residents would be less severe and more evenly distributed. The segregation in the City of Fort Pierce stems from the scarcity of affordable and adequate housing options.

## **3. Disparities in Access to Opportunity**

### **a. Analysis**

#### **1. Educational Opportunities**

- a. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The St. Lucie County Public School System utilizes an open-enrollment system where parents select from among a variety of schools close to where they live.

Parents have the assurance that their student will remain in that school through the highest grade offered unless the parent voluntarily chooses a different school.

**Early Childhood Initiative.** The St. Lucie County Public Schools' Early Childhood Initiative is a county-wide movement to support excellence in instruction for all Age 3 to Grade 3 students. Program goals include ensuring that students master the Common Core Standards while also developing a life-long love of learning, creating and innovating.

The Early Childhood initiative supports evidence-based instructional practices and the implementation of state-approved curricula to prepare all students for educational success in grades PK through 12 and beyond.

The initiative also includes partnering with parents and community members to collectively meet the educational, safety and well-being needs of each child, every day.

**Career and Technical Education.** The St. Lucie County Public School system offers a complete range of career options for all students, helping them to discover their interests and the educational pathways that lead to success. These programs offer students the opportunity to achieve industry-recognized certifications, work-based learning experiences, and articulated college credits. CTE helps students gain the technical skills, rigorous academic foundation, and real-world experience they need for post-secondary education and a high-skill, high-wage, high-demand career.

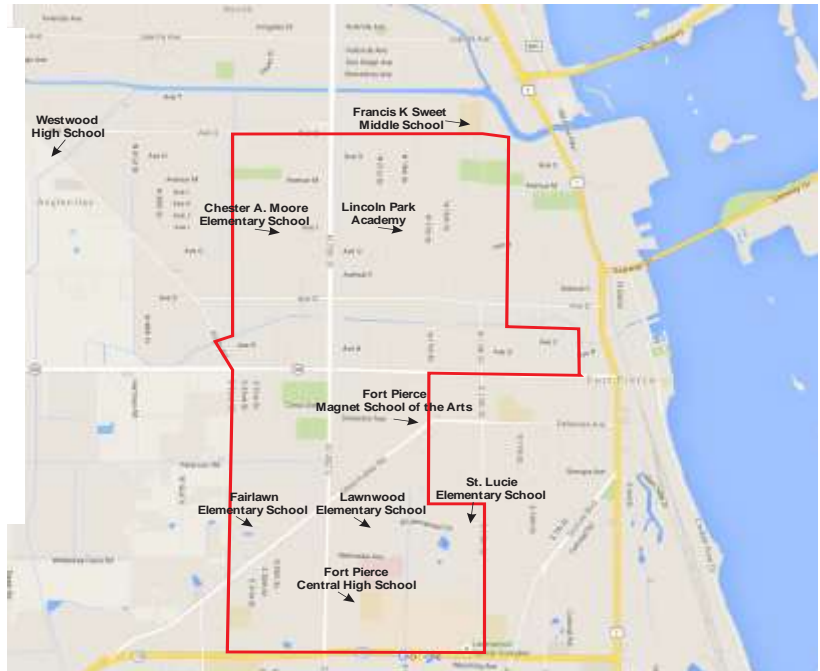
**Scholarships for Children with Disabilities Program.** The John M. McKay Scholarships for Students with Disabilities Program was created to provide educational options to parents of disabled students. The McKay Scholarships Program also offers parents public school choice. A parent of a special needs student who is dissatisfied with the student's current school may choose to transfer the student to another public school.

**Child Nutrition Services.** The nutrition services focus on enhancing the diet of students with more nutritious choices at school each and every day. The services include nutrition education that will help students to form healthy habits that will last a lifetime. School lunch menus focus on increasing the availability of fruits, vegetables, whole grains, legumes, and low-fat milk. The St. Lucie County School District continues to analyze its menu options to make sure that each student served receives a wholesome nutritious meal that is filled with vital nutrients so they can continue to learn.

- b. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Location of St. Lucie County schools within Fort Pierce R/ECAPs:

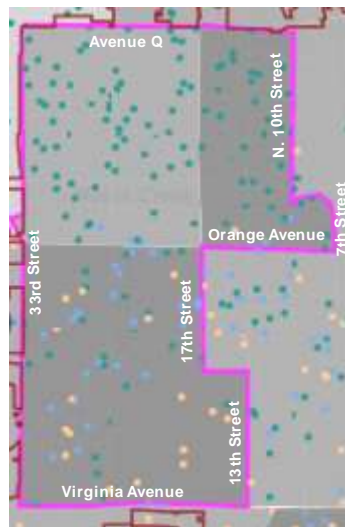
- Chester A Moore Elementary
- Francis K. Sweet Middle
- Lincoln Park Academy
- St. Lucie Elementary
- Fort Pierce Central
- Fort Pierce Magnet School of the Arts
- Fairlawn Elementary
- Lawnwood Elementary



Looking at the map that shows where St. Lucie County School District schools are located in Fort Pierce above, following are:

Residency patterns of racial/ethnic groups in Fort Pierce:

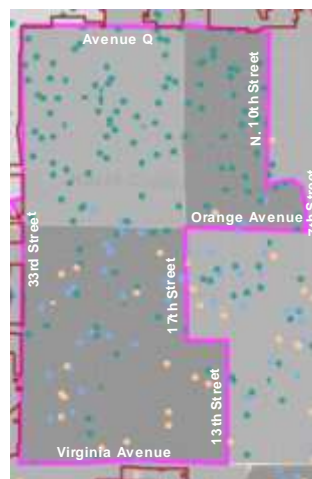
**1 Dot = 75 People**



- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic

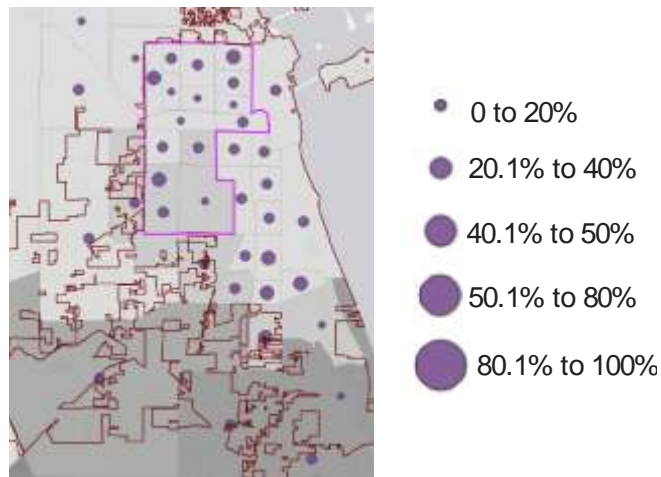
Residency patterns of national origin groups in Fort Pierce:

**1 Dot = 75 People**



- Mexico
- Haiti
- Cuba
- Jamaica
- Honduras

## Family status groups in Fort Pierce



- **Westwood High School** - Fort Pierce Westwood High School is a public magnet school in Fort Pierce. It has 1,360 students in grades 9-12.  
683 students or 50.2% of the student population at Fort Pierce Westwood High School identify as African-American, making up the majority of the student body. A typical school in Fort Pierce is made up of 41.4% African-American students, so Fort Pierce Westwood High School has a similar ethnic distribution compared to other schools in the City. The demographic breakdown of Fort Pierce Westwood High School is drastically different from that of a typical school in the state of Florida, which is made up of 22.9% African-American students on average.
- **Lincoln Park Academy** – Lincoln Park Academy is an academic magnet/college preparatory school that supports students in grades 6-12. The school has an enrollment of 1,797 students.  
**Accredited 'A' School** – Lincoln Park Academy has been an 'A' school for the past 13 years and was named one of the best high schools in America by three news sources during 2014, making the top hundred lists. The school's graduation rate is 97%. The school has a successful Project Lead the Way Engineering program and an award-winning Adobe certification program.  
**2016 Rankings** - Lincoln Park Academy is ranked #2262 in 2016 in the National Rankings and earned a silver medal. Schools are ranked based on their performance on state-required tests and how well they prepare students for college.  
**Students & Teachers** – Total Minority Enrollment – 49%; Total Economically Disadvantaged Enrolled – 42%; Full-time Teachers – 82
- **Fort Pierce Central High School** – 4101 S. 25<sup>th</sup> Street  
Fort Pierce Central High School is a public school in Fort Pierce, Florida. It has 2,539 students in grades 9-12.  
Fort Pierce Central High School students have the opportunity to take Advanced Placement® course work and exams. The AP® participation rate at Fort Pierce Central High School is 33 percent. The student body makeup is 50 percent male and 50 percent female, and the total

minority enrollment is 67 percent. Fort Pierce Central High School is 1 of 12 high schools in the St. Lucie County School District.

African American	36.22%
White	33.16%
Hispanic/Latino	26.87%
Two or More	1.98%
Asian	1.46%
Not reported	0.3%

- **Francis K. Sweet Middle School** – 1400 Avenue Q

Grades: K-5; School Type: Public, Magnet; Student Enrollment: 613; Students per Teacher: 15

African American	50.24%
White	30.5%
Hispanic/Latino	13.8%
Two or More	3.21%
Asian	2.09%
Not reported	0.16%

A Magnet School is defined as an elementary, middle/junior, or high school that offers, to all students enrolled in the school, a special curriculum capable of attracting substantial numbers of students of different social, economic, ethnic and racial backgrounds.

- An "A" school designated by the Department of Education – 1999, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013
- Recipient of the Five Star School Award/Golden School Award from the Florida Department of Education – 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013

- **Chester A. Moore Elementary School** – 827 N. 9<sup>th</sup> Street

Chester A. Moore Elementary School enrolls 641 students in grades 1st through 12th. Total Students: 641; Pupil/Teacher Ratio: 14.2:1; Full Time Teachers: 45

African American	70.98%
Hispanic/Latino	22.15%
White	5.46%
Not reported	1.4%

Chester A. Moore Elementary School is the 983rd largest public school in Florida and the 10,668th largest nationally.

- **Fort Pierce Magnet School of the Arts** – 1200 Delaware  
Fort Pierce Magnet School of the Arts is a public magnet school. It has 476 students in grades PK and K-8. According to state standards, 50% of students at this school are considered proficient in math and/or reading.

Hispanic/Latino	44.04%
African American	41.82%
White	11.41%
Two or More	2.21%
Not reported	0.51%

- **Fairlawn Elementary School** – 3203 Rhode Island Avenue  
Fairlawn Elementary School is a public magnet school in Fort Pierce. It has 626 students in grades PK and K-5. According to state standards, 71% of students at this school are considered proficient in math and/or reading.

Hispanic/Latino	98.68%
Not reported	1.32%

- **St. Lucie Elementary School** – 2020 S. 13<sup>th</sup> Street  
St. Lucie Elementary School is a public school in Fort Pierce. It has 5,759 students, grades with a 14:1 students/teacher ratio.

African American	52.4%
Hispanic/Latino	33.05%
White	10.03%
Two or More	2.97%
Not reported	1.55%

- c. Describe how school-related policies, such as school enrollment policies, affect a student’s ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

**St. Lucie County School District Enrollment Policies:**

The district offers regional school zones rather than neighborhood schools. This assignment process allows for preference to be given to families who have siblings currently attending the school or live within two miles of a school. It also enables the district to offer more choices to parents and best utilize school facilities. Unlike many high-growth school systems, St. Lucie County Schools does not have to re-district when an area grows beyond the capacity of the school in that neighborhood.

**The Benefits of School Choice** – 1) Once a student is assigned to a school he/she does not have to leave unless the family chooses to change schools or the family moves into another choice zone; and 2) the St. Lucie County School District believes this is fair to all students, since parents are allowed equal opportunity to select from all schools within their zone.

We were not able to determine that there are any protected class groups are least successful in accessing proficient schools.

## 2. Employment Opportunities

- a. Describe any disparities in access to jobs and labor markets by protected class groups.

According to "An Equity Profile of the Southeast Florida Region,"<sup>9</sup> at nearly every level of educational attainment, people of color earn less and face higher unemployment than whites, and women generally have worse economic outcomes than their male counterparts.

Concentrations of unemployment exist in Southeast Florida's communities of color in the region's urban centers. One in four of the region's unemployed residents live in the 20 percent of neighborhoods where at least 91 percent of residents are people of color. Areas of concentrated unemployment are found in Indian River, St. Lucie, and Palm Beach counties.

**Declining or Stagnant Wages for Most Workers** - Declining wages play an important role in the region's high inequality. After adjusting for inflation, wages have declined or stagnated for the vast majority of Southeast Florida's workers over the past three decades. Wage decline has been more severe for the lowest paid workers in the region than it has been nationwide. Wages fell nine percent for workers in the 10th percentile (those earning less than 90 percent of all workers), and eight percent for those in the 20th percentile, while wages increased by 17 percent for workers in the 90th percentile.

**Higher Poverty and Working Poverty for People of Color** - Blacks and Hispanics are much more likely to be working poor compared with all other groups, with 8.9 and 8.8 percent working poverty rates, respectively, and compared with the 6.0 percent average overall.

- b. How does a person's place of residence affect their ability to obtain a job?

According to Forbes.com, your salary and the ability to get a job may depend more on where you live than your resume. Additionally, Forbes reports that for every innovation job that is added, another five jobs are added in the local service economy. Innovation jobs have double the multiplier effect than manufacturing jobs do; and, innovation jobs are typically much higher paying, the service jobs pay more too.<sup>10</sup>

According to forworkingfamilies.org, local hire programs have developed effective mechanisms for helping low income local residents find jobs at new development sites and have created job opportunities with existing employers that had previously been unavailable to many low-income workers. Strong policy language sets the stage for success by clearly articulating the responsibilities of all stakeholders: developers, employers, and contractors.<sup>11</sup>

The City of Fort Pierce's procurement process includes requirements for developers, contractors, etc. bidding on projects to hire local citizens.

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<sup>9</sup> <https://dornsife.usc.edu/assets/sites/242/docs/se-florida-april-2014.pdf>

<sup>10</sup> <http://www.forbes.com/sites/troyonink/2012/05/22/the-new-geography-of-jobs-where-you-live-matters-more-than-ever/#93752407150c>

<sup>11</sup> <http://www.forworkingfamilies.org/sites/pwf/files/publications/0708-MakingDevelopmentWorkForLocalResidents-Summary.pdf>

- c. Which racial/ethnic, national origin or family status groups are least successful in accessing employment?

According to Solardarity-us.org, race does matter when it comes to joblessness. According to the Bureau of Labor Statistics (BLS) unemployment for whites in 2010 was 9.3%, but 15.6% for Blacks. Overall the unemployment rate was 10% (much higher when those who have given up and the underemployed are added). Long-term unemployment (those persons jobless for 27 weeks or more) continues to increase. It is twice as high for African Americans.

A second statistic also shows the color divide. Black men working at full-time jobs make \$622 per week, which is 74.5% of the \$835 median for white men.

The unemployment rate among men with college degrees in 2010 was 4.4% for whites, and 8.4% for Blacks. For those with high school diplomas, unemployment is 10% for white men, and 15.9% for Black men. For those with less than a high school degree, it is 13.9% for white and 24.2% for Black men.

The BLS statistics among women are similar — 4% for white women with a college degree compared to 6.9% for Black women. For those with a high school diploma, 7.4% for white women, compared to 11.4% for Black women; and 13% for white women with less than a high school degree compared to 18.3% for Black women.

The BLS statistics are raw data compiled from across the country. The fact that the racial gap is consistent for all social categories indicates that race and racism is structural in society. Accordingly, special measures (enforced by the federal government) are required to help African Americans overcome structural discrimination.<sup>12</sup>

### **3. Transportation Opportunities**

- a. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

Community Transit, a division of Council on Aging of St. Lucie, Inc. (COASL), is the public transit provider for St. Lucie County through a contract with the Board of County Commissioners of St. Lucie County.

Community Transit has been servicing St. Lucie County since 1990 and has two modes of transportation:

- 1) A demand response system which is an origin to destination system where passenger trips are generated by calls from passengers or their agents at least twenty-four (24) hours in advance, to the Transit Reservationists, who then schedules a vehicle to pick up the passenger; and
- 2) A fixed route service provides service along specific routes with scheduled arrival times at predetermined bus stop areas. This is the type of system most people refer to when they mention a city bus. Public transportation is provided at a nominal cost to all locations for all reasons within St. Lucie County.

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<sup>12</sup> <https://www.solidarity-us.org/node/2604>

Community Transit has seven (7) routes serving St. Lucie County. Two of the seven (7) routes are regional, Route 1 connects with Martin County and Route 7 connects with Indian River County. As funding becomes available, Community Transit continues to develop system improvements and implement new fixed routes.

- b. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Transportation is a big household expense, constituting as much as a fifth of the budget for an average family of four. For those with low incomes, cars are not an option. If it costs hundreds a month to own a car, a monthly transit pass is a better alternative, although costly.

Following is the fare schedule for the City of Fort Pierce’s transit system – the Treasure Coast Connection:

Single ride	\$2.00
Senior, Disabled, Children 5-11	\$1.00
Medicare Card Holders	\$1.00
Children under 5	Free
Single Day Pass	\$5.00
Senior, Disabled Single Day Pass	\$2.50
10-Ride Ticket Book	\$14.00
Senior, Disabled 10-Ride Ticket Book	\$7.00
Monthly Pass	\$50.00
Senior, Disabled Monthly Pass	\$25.00

**FARES - DEMAND RESPONSE:**

Single ride	\$2.00
Seniors / Disabled	\$1.00
Medicare Card Holders	\$1.00
Children 5-11	\$1.00
Children under 5	Free
Medicaid Recipients	\$1.00 co-pay

While we were unable to determine which racial/ethnic, national origin or family status groups are most affected by the lack of reliable, affordable transportation, the Campaign for Better Transport recently published a new report on transport poverty, ‘Transport, Accessibility and Social Exclusion’, which states that a lack of affordable public transport is having a serious effect on low income households and reducing people’s ability to find work. The report also states that those on low incomes are more reliant on bus services with half of the poorest of the population not having a car, rising to more than two-thirds of job seekers.<sup>13</sup>

- c. Describe how the jurisdiction’s and region’s policies, such as public transportation routes or transportation systems designed for use by personal vehicles, affect the ability of protected class groups to access transportation.

Data indicates that Fort Pierce area individuals utilizing public transportation options have higher average travel times to work. And in the City of Fort Pierce, more renters use public transit than homeowners. The same is true of minorities in comparison to white persons. We were unable to determine how, if any, transportation systems designed for use by personal vehicles affect the ability of protected class groups to access transportation.

<sup>13</sup> <http://www.transportworks.org/news/cbt-poor-public-transport-having-serious-effect-low-income-households-and-jobseekers>

#### 4. Low Poverty Exposure Opportunities

- a. Describe any disparities in exposure to poverty by protected class groups.

According to the American Psychological Association<sup>14</sup>, discrimination and marginalization are sometimes barriers for ethnic and racial minorities seeking to escape poverty. Additionally:

- African American children are three times more likely to live in poverty than Caucasian children. American Indian/Alaska Native, Hispanic, Pacific Islander, and Native Hawaiian families are more likely than Caucasian and Asian families to live in poverty;
- Minorities are more likely to receive high-cost mortgages: African Americans (53%) and Latinos (43%), in comparison to Caucasians (18%); and
- Unemployment rates for African Americans are typically double those of Caucasian Americans. African American men working full time earn 72% of the average earnings of comparable Caucasian men and 85% of the earnings of Caucasian women.

- b. What role does a person's place of residence play in their exposure to poverty?

Research forges a solid, convincing link between lower income neighborhoods, low socioeconomic status and bad health. Poor neighborhoods are more likely to have higher crime rates, lower-performing schools, and little access to healthy foods. Transportation and time also factor into health behaviors. A person who has strung together three jobs to make ends meet for his or her family, and who must travel by bus to each job, likely does not have the luxury to make healthy eating choices.

Low-income neighborhoods are likely to have lower-quality social, municipal, and local services. Because of higher crime rates and less playground safety—to name but a few factors—poor neighborhoods are more hazardous and less likely to contain green space than well-off neighborhoods. Their households are more crowded, noisy, and physically deteriorated, and they contain a greater number of safety hazards.

Although childhood is generally considered to be a time of joyful, carefree exploration, children living in poverty tend to spend less time finding out about the world around them and more time struggling to survive within it. Poor children have fewer and less-supportive networks than their more affluent counterparts do; live in neighborhoods that are lower in social capital; and, as adolescents, are more likely to rely on peers than on adults for social and emotional support. Children living in lower income neighborhoods also have fewer cognitive-enrichment opportunities. They have fewer books at home, visit the library less often, and spend considerably more time watching TV than their middle-income counterparts do.

Often, poor children live in chaotic, unstable households. They are more likely to come from single-guardian homes, and their parents or

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<sup>14</sup> <http://www.apa.org/pi/ses/resources/publications/factsheet-erm.aspx>

caregivers tend to be less emotionally responsive. Single parenthood strains resources and correlates directly with poor school attendance, lower grades, and lower chances of attending college. Contrast these children with their peers living in stable two-parent families, who have more access to financial resources and parental time, receive more supervision, participate in more extracurricular activities, and do better in school.<sup>15</sup>

- c. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

According to the National Poverty Center (NPC):<sup>16</sup>

- Racial disparities in poverty result from cumulative disadvantage over the life course, as the effects of hardship in one domain spill over into other domains.
- In the U.S., one of every three African American children and one of every four Latino children live in poverty— two times higher than the rate for white children.
- By age three, white children have a significantly larger vocabulary than black children of the same economic class.
- The collateral consequences of felony convictions—such as bans on entering many occupations, on voting, jury service, and receiving federal college loans and grants—harm both ex-offenders and their communities.
- Residents of predominately black or Hispanic neighborhoods have access to roughly half as many social services as those in predominately white neighborhoods.

- d. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

Local authority-driven initiatives and policies that contribute to extending opportunities to poorer communities and protected class groups will empower them to achieve economic security and social inclusion. Such initiatives contribute significantly to improving their lives. They include:

- Instituting participatory processes that give a voice in decision-making to protected class groups;
- Partnering with communities, community-based development organizations (CBDOs), and non-governmental organizations (NGOs), including advocacy groups, on community-based initiatives;
- Initiating creative placemaking initiatives to instill civic pride and improve the communities;
- Supporting the development of new and growth of existing small businesses and micro-enterprises;
- Collaborating with foundations and philanthropic organizations on social and economic developmental projects; and
- Initiating special programs to reach vulnerable groups.

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<sup>15</sup> <http://www.ascd.org/publications/books/109074/chapters/Understanding-the-Nature-of-Poverty.aspx>

<sup>16</sup> [http://www.npc.umich.edu/publications/policy\\_briefs/brief16/](http://www.npc.umich.edu/publications/policy_briefs/brief16/)

The City of Fort Pierce Department of Urban Redevelopment is committed to act on a wide range of issues, including improving participatory processes, negotiating collaborations and partnerships to counter exclusion, developing instruments to target and reach the areas of greatest need, and to launching a range of initiatives to foster social inclusion.

## **5. Environmentally Healthy Neighborhood Opportunities**

- a. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

Nearly one fifth of all Americans—about 52 million people—live in poor neighborhoods. Some groups of people are more likely to live in poor neighborhoods than others. Poor families are more likely to live in neighborhoods with concentrated poverty and wealthier families are more likely to live in wealthier neighborhoods.

The overwhelming weight of evidence indicates that physical, social and service characteristics of neighborhoods influence health in important ways, including by shaping choices and behaviors.

### **Affordable housing can improve health outcomes by freeing up family resources for nutritious food and health care expenditures.**

Families paying excessive amounts of their income for housing often have insufficient resources remaining for other essential needs, including food, medical insurance, and health care. An analysis of 2012 household expenditures found that low-income households that spent more than half their income on housing costs, and were therefore severely housing cost burdened, spent less on food and health care compared to similar households spending 30% or less of their income on housing.

### **By providing families with greater residential stability, affordable housing can reduce stress and related adverse health outcomes.**

There is little question that residential instability has adverse health impacts. Studies continually show that homeless children are more vulnerable to mental health problems, developmental delays, poor cognitive outcomes and depression than children who are stably housed; and stable housing is strongly associated with improved mental health outcomes and a reduction in the number of days hospitalized among formerly homeless adults.

### **Affordable home ownership may positively impact mental health.**

Many studies have shown that homeowners generally have better physical and mental health outcomes than renters. This may be because homeowners seem to experience higher levels of self-esteem and an increased sense of control, which may be related to improved health.

### **Well-constructed and well-maintained affordable housing can reduce health problems associated with poor-quality housing.**

When families have few affordable housing options, they may be forced to live in substandard housing that puts residents at risk of lead poisoning, asthma, and accidental injury. Evidence suggests that simple measures such as the installation of smoke detectors and window guards can have a major impact on resident safety and health.

**Stable, affordable housing may improve health outcomes for individuals with chronic illnesses by providing an efficient platform for health care delivery.** A growing body of research suggests that stable and affordable housing may help individuals living with chronic diseases such as HIV/AIDS, diabetes, and hypertension increase their rates of medical care, maintain their treatment regimens, and achieve better health outcomes.

**Access to neighborhoods of opportunity can reduce stress, increase access to amenities, and lead to important health benefits.** Families that can only find affordable housing in areas with very high poverty levels may be prone to greater psychological distress and exposure to violent or traumatic events. The clustering of concentrated social disadvantages, including residential disorder and limited neighborhood resources exacerbates stress, which can have an effect on resident's physical health.

**By alleviating crowding, affordable housing can reduce exposure to stressors and infectious disease.** When housing is not affordable, families may be forced to double up with others or to otherwise live in overcrowded conditions. Individuals who live in a crowded setting may have limited ability to manage daily stressors and successfully maintain supportive relationships, which can lead to increased levels of psychological distress, feelings of helplessness and even high blood pressure.

**Access to affordable housing allows survivors of domestic violence to escape abusive homes, which can improve mental health and physical safety.** Domestic violence is one of the leading causes of homelessness for women and children in the United States. Incidence of domestic abuse appears to worsen during periods of economic downturn. Unable to find affordable alternative housing arrangements, many women choose to stay in or return to an abusive situation rather than become homeless.

**Affordable and accessible housing linked to supportive services enables older adults and others with mobility limitations to remain in their homes.** As individuals age, they often develop mobility impairments that make it difficult for them to safely live in their homes. Being able to age in place is associated with better physical and mental well being.

We know that, when it comes to health impact, characteristics of both people and places matter. Listed below are several examples of positive actions we can take, at the neighborhood level, to help create environmentally-healthy neighborhoods.

In addition to strategies directly targeting improvement at the neighborhood level, interventions targeting individuals in the neighborhoods can also be expected to contribute to improving the quality of neighborhoods from a health perspective. Examples of these include the Earned Income Tax Credit, a poverty reduction policy directly benefiting low-income households that significantly concentrates financial resources in poor neighborhoods.

Following are examples of neighborhood-level interventions that are proving to make a difference toward creating environmentally healthy neighborhoods for protected class groups:

- Homeownership assistance to families which will contribute to neighborhood stability and development, as individual assets become investments in neighborhoods; and
- Adding retail food markets into disadvantaged communities to increase the availability of affordable healthful food choices in neighborhoods that now have the most limited choices.

A range of community revitalization initiatives designed to promote neighborhood economic development and improve physical, social and service environments in neighborhoods are underway or are being considered as important approaches to improving community health:

- Organizing the Community - to motivate action and bring people together to work collectively to improve neighborhoods.
  - Promotion of local history, arts and cultural assets in our historic neighborhoods which will increase tourism, promote economic development and instill civic pride.
  - "Environmental justice" interventions – the removal of all known toxic exposures in the physical environment in neighborhoods to eliminate health.
  - Identifying strategies to reduce residential segregation along socioeconomic lines, for example through: zoning measures; expanding the supply of affordable housing in neighborhoods that offer opportunities for employment and quality schools; enforcement of fair housing laws, including the Federal Fair Housing Act.
- b. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Individuals in minority racial or ethnic groups also are more likely to live in poor neighborhoods: nearly half of all blacks live in poor neighborhoods, compared with only one in ten whites. The uneven pattern of neighborhood disadvantage across racial or ethnic groups is not fully explained by differences in family income, because even among families with similar incomes, blacks and Hispanics live in neighborhoods with higher concentrations of poverty than whites.

Racial and economic segregation go hand in hand, so that blacks are concentrated in the poorest neighborhoods to a much greater extent than any other racial or ethnic group.

## **6. Patterns in Disparities in Access to Opportunity**

- a. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status.

According to the Center for Disease Control and Prevention<sup>17</sup>, the socioeconomic circumstances of persons and the places where they live and work strongly influence their health. In the City of Fort Pierce,

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<sup>17</sup> <http://www.cdc.gov/mmwr/pdf/other/su6001.pdf>

as elsewhere, the risk for mortality, morbidity, unhealthy behaviors, reduced access to health care, and poor quality of care increases with decreasing socioeconomic circumstances.

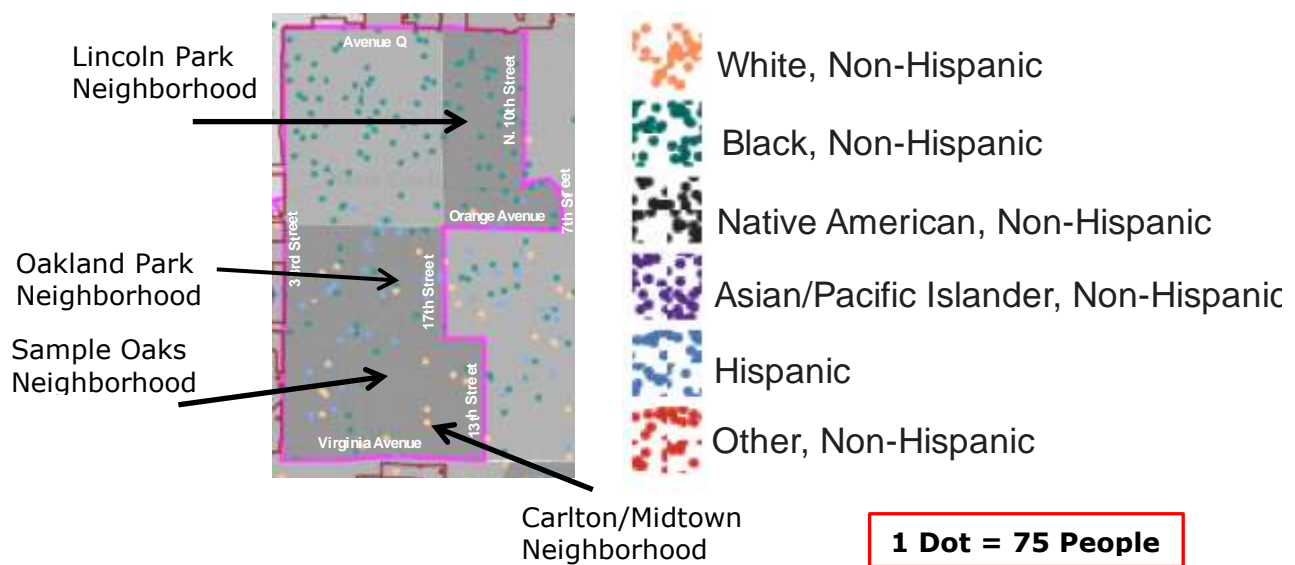
Educational attainment and family or household income are two indicators used commonly to assess the influence of socioeconomic circumstances on health. Education is a strong determinant of future employment and income.

In the majority of persons, educational attainment reflects material and other resources of family of origin and the knowledge and skills attained by young adulthood. Therefore, it captures both the long-term influence of early life circumstances and the influence of adult circumstances on adult health.

In many cities, racial differences in poverty levels, employment opportunities, wages, education, housing and health care, among other things, are so strong that the worst urban conditions in which whites reside are considerably better than the average conditions of black communities.<sup>18</sup>

Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

The Racially or Ethnically Concentrated Areas of Poverty R/ECAPs map of Fort Pierce shown below highlights the Lincoln Park Neighborhood, which is predominantly plagued with poor access to opportunity, such as accessible employment/job training opportunities and exposure to adverse factors, such as poor quality housing, food deserts, convenience access to medical care, etc. Public transportation is available in the Lincoln Park neighborhood; however, the transit system lacks the number of timely routes needed to accommodate the working class.



<sup>18</sup> <http://nhi.org/online/issues/147/privilegedplaces.html>

The Racially or Ethnically Concentrated Areas of Poverty R/ECAPs map (shown above) also highlights the following Fort Pierce neighborhoods:

Lincoln Park - Oakland Park – Sample Oaks – Carlton Midtown

These neighborhoods are also plagued with poor access to employment/job training opportunities. Improved quality of housing is available; however, the cost to purchase or rent decent housing is continuously rising. Public transportation provides easier access to quality food and medical care in these neighborhoods, however, as with the Lincoln Park neighborhood; it lacks timely routes needed to accommodate the working class as well.

**b. Additional Information**

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

The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

Please see the answer to Number 6a, above. Additionally, the City of Fort Pierce is currently collaborating with Career Source Research Coast (formerly Workforce Solutions) and Indian River State College to promote job training opportunities that include free tuition, stipends for transportation and child care for the under employed and unemployed.

**c. Contributing Factors of Disparities in Access to Opportunity**

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

- Access to financial services
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lending Discrimination – loan origination and subprime lending rates; loan approval disparities based on race and Hispanic non-Hispanic ethnicity
- Location of employers
- Location and type of affordable housing

## 4. Disproportionate Housing Needs

### a. Analysis

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

According to HUD's Affirmatively Furthering Fair Housing Tool (AFFHT), Black, Non-Hispanic groups experience higher rates of housing cost burden, as shown in the graphic below:



The trends of housing occupancy by tenancy and housing costs are a burden on the city, and the vast majority of housing units are owner-occupied. This trend holds true for the white population, but is reversed for both Hispanics and African American households.

Renter-occupied households as a whole are more likely to spend more than 35% of their monthly income on housing costs than those that own. When considering various incomes within lower income brackets, there are more renters than owners. Also within this income range, households that rent have high probabilities of paying above 35% of their household income than those that own.

Conversely within the higher income bracket, there are more owner-occupied housing units and therefore more owners are cost-burdened in these brackets. Proportionally, however, renting households making less than \$20,000 are the most cost-burdened group within the City of Fort Pierce.

In comparison to the 2009 income and ownership for the low-income population characteristics, the following statistics remain similar in pattern:

- Just under one in ten very low-income persons owned their own home;
- More than one out of three renters were very low-income;
- Very low-income renters constituted the largest group of renters by income;
- Low-income owners were just under one in eight owners;
- Low-income renters were just over one in five in the City; and
- Moderate-income owners were one in five and one and five were also renters.

**Housing Problems** - Cost-burden, severe cost-burden, substandard housing conditions, and overcrowding (especially large families) are key indicators of the economic health and sustainability of a community and its neighborhoods. Overall, in 2014, renter occupied households reported

having more housing problems than owner occupied households in Fort Pierce.

**Housing Cost Burden** - In 2014, the American Community Survey reported that renter occupied households suffered a much higher cost burden than owner occupied households with approximately 5,154 households paying 35% or more of their monthly income toward housing costs. More specifically, very low-income households represented 4,036 of the 5,154 households reflected in the highest bracket of cost burden.

Among all types of households combined within the City, more than 7,290 households, or approximately 45% of all households in Fort Pierce pay more than 35% of income toward monthly housing costs. By comparison, 29% of households in Florida are cost burdened.

In regards to elderly households, 4,201 or approximately 25% of households are headed by a person 65 years or older. In comparison, elderly persons head 28.3% of households statewide. Elderly households are 42.3% owner occupied.

**Overcrowding and Poverty** - The 2010-2014 ACS 5-Year Estimates data shows that 31.8% or 6,904 households, out of a total 16,249 occupied housing units in Fort Pierce are living at or below poverty. The data available does not provide overcrowding statistics by income level, but it does reflect that approximately 13% or 2,106 households are living in overcrowded conditions.

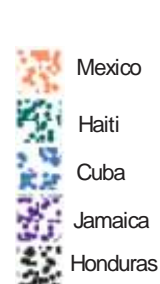
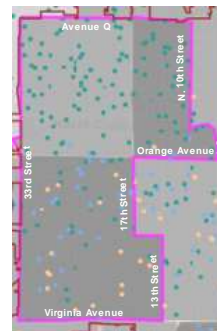
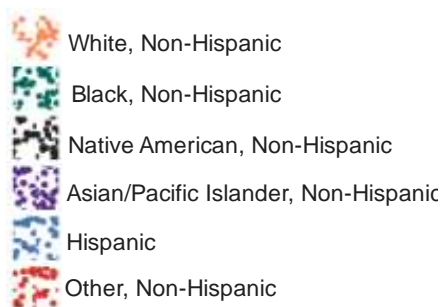
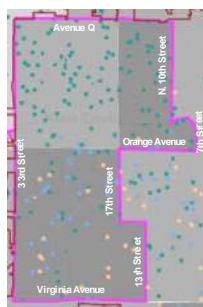
**Substandard Housing** - The City of Fort Pierce uses three main categories to define housing conditions within the City. These categories include: 1) substandard housing suitable for rehabilitation, 2) housing not suitable for rehabilitation, and 3) standard housing in need of minor home repair. While the City has homes that are in substandard condition due to lack of maintenance/code enforcement, less than 1% are lacking kitchen or plumbing facilities.

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

The very low-income or below poverty neighborhoods within the City of Fort Pierce generally face the greatest housing burdens, including substandard housing. All of these areas are designated R/ECAPs by the U.S. Department of Housing and Urban Development (HUD). The predominant race/ethnicity or national origin groups in these areas are shown in the maps below:

Race/Ethnicity:

National Origin Groups:



**1 Dot = 75 People**

3. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Of the 299 households who reported head of household data in the Fort Pierce Housing Authority's most recent report, 39 (13.04%) were elderly, 260 (86.96%) were nonelderly, 241 (80.6%) were disabled, 101 (33.78%) contained children and 366 (122.41%) were headed by a female.

**Assisted Rental Housing** - In cooperation with the Housing Authority of the City of Fort Pierce, an analysis of current and projected Public Housing needs was completed using different tools and sources such as, the *American Community Survey 2014*, the *Fort Pierce Community Needs Assessment Survey*, the *Fort Pierce Community Needs Assessment Survey for Organizational Input*, the *Fair Housing Survey*, and *The University of Florida Shimberg Center for Housing Studies 2014 Assisted Housing Inventory* and direct information received from the Fort Pierce Housing Authority.

**Public and Assisted Housing Units Available and Physical Conditions**

**Analysis** - According to the *2014 Assisted Housing Inventory*, there are 17 Public and Assisted Housing Developments in the City of Fort Pierce. Within the seventeen (17) developments, there are approximately 2,824 assisted housing units funded by several federal, state and local housing programs. Physical conditions of the units are generally determined by the approximate age of the unit and the potential for overcrowding. After analyzing the data available, it was determined that seven of the developments were built prior to the year 2000, five developments were built after the year 2000, and five of the developments did not report an approximate age.

The bedroom sizes of units belonging to the Fort Pierce Housing Authority range from studio apartments to 5-bedroom apartments. The FPHA's public housing inventory includes 20% studio apartments, 22% 1 bedroom apartments, 18% 2 bedroom apartments, 28% 3 bedroom apartments, 11% 4 bedroom apartments, and 1% 5 bedroom apartments.

**Public Housing and Tenant-Based Waiting List Characteristics** - The Fort Pierce Housing Authority reported that there were approximately 8,997 applicants on the Section 8 Housing Choice Voucher Waiting List and approximately 1,593 applicants on the Public Housing Units Waiting List.

The Housing Authority of the City of Fort Pierce (HACFP) Section 8 Housing Choice Voucher waiting list is currently closed. It was last open for three days in May 2015. There is no notice of when this waiting list will reopen. There are currently 8,841 people on the Fort Pierce Housing Authority's Section 8 Waiting List.

Breakout of people on PHA Waiting List: Public Housing: 255 Elderly; 674 Disabled; 825 Non-Elderly or Disabled. Section 8: 254 Elderly; 1,308 Disabled; 7,252 Non-Elderly or Disabled.

Number of near-elderly, elderly, handicapped/disabled, homeless, very low income (50%), extremely low income (30%) - Public Housing: 715 Extremely Low; 97 Very Low; 2 Low - Section 8: 594 Ext Low; 142 Very Low; 86 Low.

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

Currently, in Fort Pierce, there are 17,313 houses: 17,313 (16,249 occupied: 7,234 owner-occupied, 9,015 renter-occupied).

<b>City of Fort Pierce Housing Units</b>	<b>Occupied Housing</b>	<b>Owner-Occupied Housing Units</b>	<b>Renter-Occupied Housing</b>
Total	16,249	7,234	9,015
White	7,440	4,776	2,664
Black or African American	5,835	1,844	3,991
Hispanic or Latino Origin	2,223	891	1,332

ACS, 2010 – 2014, 5 Year Plan

**Monthly Rent paid by renters in 2015 in the City of Fort Pierce:**

- Less than \$100: 149
- \$100 to \$149: 47
- \$150 to \$199: 78
- \$200 to \$249: 78
- \$250 to \$299: 62
- \$300 to \$349: 79
- \$350 to \$399: 61
- \$400 to \$449: 334
- \$450 to \$499: 209
- \$500 to \$549: 314
- \$550 to \$599: 149
- \$600 to \$649: 335
- \$650 to \$699: 274
- \$700 to \$749: 277
- \$750 to \$799: 262
- \$800 to \$899: 83
- \$900 to \$999: 85
- \$1,000 to \$1,249: 99
- \$2,000 or more: 27
- No cash rent: 184

**Home value estimates of owner-occupied houses/condos in 2015 in Fort Pierce:**

- \$25,000 to \$29,999: 26
- \$30,000 to \$34,999: 64
- \$35,000 to \$39,999: 11
- \$40,000 to \$49,999: 281
- \$50,000 to \$59,999: 165
- \$60,000 to \$69,999: 192
- \$70,000 to \$79,999: 199
- \$80,000 to \$89,999: 154
- \$90,000 to \$99,999: 110
- \$100,000 to \$124,999: 263
- \$125,000 to \$149,999: 244
- \$150,000 to \$174,999: 126
- \$175,000 to \$199,999: 175
- \$200,000 to \$249,999: 76
- \$250,000 to \$299,999: 22
- \$300,000 to \$399,999: 58
- \$400,000 to \$499,999: 17
- \$500,000 to \$749,999: 8
- \$750,000 to \$999,999: 19
- \$1,000,000 or more: 30

Information is not available on the differences in rates paid by renter and owner-occupied housing by race/ethnicity within the City of Fort Pierce.

**b. Additional Information**

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

In 2015, the demand for rental apartments reached its highest level ever since the 1960s. The pinched access to mortgage credit after the Great Recession is one reason why. Another is that many Americans—especially the poor and people of color—haven’t felt the effects of the economic recovery, and may not be able to come up with funds for a down payment. A third reason is that Millennials, now the largest generation ever since the baby boomers, are especially loath to buy homes. The supply of rentals, especially at the lower end of the market, has been no match for the skyrocketing demand.

In 2016, a worker would need to make \$20.30 per hour to rent a two-bedroom accommodation comfortably—without devoting more than 30% of income on housing costs.

To really understand the weight of 2016’s housing wage, consider this: The average hourly wage for Americans is actually \$15.42 per hour, which is not nearly enough to afford a two-bedroom. And the federal minimum wage, at \$7.25, is around a third of what’s required. That means minimum-wage workers would have to work three jobs, or 112 hours a week, to be able to afford a decent two-bedroom accommodation.

If this worker slept for eight hours per night, he or she would have no remaining time during the week for anything other than working and sleeping.

Raising the minimum wage would undoubtedly narrow these gaps, but it’s still just not enough. The key lies in expanding the affordable housing supply, one of the most important steps we can take to help people succeed today, and live healthier lives long into the future.

2. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.

Please see our answer to #B1 above.

**c. Contributing Factors of Disproportionate Housing Needs**

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

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lending Discrimination

**C. Publicly Supported Housing Analysis**

**a. Publicly Supported Housing Demographics**

1. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))? Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Our research does not show certain racial/ethnic groups that are more likely to be residing in one category of public supported housing more than other categories.

40% of public housing units are occupied by households headed by a person 65 years old or older, most of who live alone (88%). Over half of the elderly households live in public housing specifically designed for the elderly. Public housing contains a much higher percentage of elderly households than the overall rental housing stock. Only 14% of all rental housing is occupied by the elderly.

Households with children comprise 43% of public housing within the City of Fort Pierce. A slight majority of these families (56%) are single-parent households. Households headed by handicapped persons are also an important component of public housing; 12% of public housing families have a nonelderly disabled head of household. To summarize: 52% of all public housing is occupied by elderly or handicapped households, 43% by households with children (including some with handicapped heads of household), and the balance by nonelderly households without children.

Overall, within the City of Fort Pierce, 48% of public housing households are black, compared to 44% of renter households. Hispanic households make up 15% of public housing households. Non-Hispanic white households occupy 39% of public housing, considerably less than their share of the total renter population (29%).

The HUD Resident Characteristics Report (RCR) provides updated Head of Household race and ethnicity data at the Fort Pierce Housing Authority (FPHA) and property level. Across all properties in the FPHA portfolio, 83% of households identified as black, 14% identified as white and 6% identified as Hispanic or Latino.

Public housing tenants are very poor. Considering the number of elderly households, single-parent households, and disabled households, it is not surprising that only 21% of all public housing households within the City of Fort Pierce reported income from wages and salaries. 43% reported receiving social security, while 44% reported receiving public assistance.

The average annual income of public housing residents living in Fort Pierce Housing Authority (FPHA) properties is \$9,654. Of all FPHA public housing residents, 1% has no income and 1% earns more than \$25,000, while 98% have incomes that fall between \$0 and \$25,000.

Distribution of incomes among the FPHA's public housing residents:

No Income	\$1-5,000	\$5,001-10,000	\$10,001-15,000	\$15,001-20,000	\$20,001-25,000	\$25,000 and Up
1%	20%	45%	18%	9%	5%	1%

The HUD Residential Characteristics Report (RCR) includes source of income information as well. The data includes five categories of family income: wage income, welfare income, SSI/SS/Pension income, other income and no income. Some families receive income in multiple categories.

Among families residing in Housing Authority of the City of Fort Pierce public housing 25% have wage income, 85% have welfare income, 60% have SSI/SS/Pension income, 26% have other income and 0% have no income.

**b. Publicly Supported Housing Location and Occupancy**

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

Following is a listing of public housing within the City of Fort Pierce, showing which ones are located within the previously discussed segregated areas and R/ECAPs. FPPH indicates public housing owned by the Fort Pierce Housing Authority.

<b>Number of Public Housing Developments and Type of Household</b>			
<b>Name of Development</b>	<b>Assisted Units</b>	<b>Type of Household</b>	<b>Located within R/ECAPs</b>
Avenue H - FPPH	12	Elder; Family	Yes
Bethany Court	60	Family	Yes
Buell Brown - FPPH	95	Elder; Family	Yes
Jenkins Pointe Apartments – Phase 1	14	Family	No
Jenkins Pointe Apartments – Phase II	43	Family	No
Jenkins Pointe Apartments, -Phase III	14	Family	No
Juanita Avenue - FPPH	20	Family	Yes
Live Oak Villas	104	Family	Yes
Live Oak Villas II	80	Family	Yes
Madison Cay	132	Family	Yes
Madison Vines	92	Family	No
Orangewood Village	60	Family	Yes
Parkland Homes - FPPH	70	Family	No
Pine Creek Village	107	Family	Yes
Sands at St. Lucie	320	Family	Yes
Sabal Chase Apartments	340	Family	No
South 27 <sup>th</sup> Street Circle - FPPH	52	Family	Yes
Eldorado Terrace - FPPH	70	Family	Yes
Garden Terrace - FPPH	259	Elderly; Family	Yes
Lawnwood Terrace - FPPH	84	Elderly; Family	Yes
Park Terrace - FPPH	284	Elderly; Family	Yes
Wildwood Terrace - FPPH	60	Elderly; Family	No
Scattered Sites	280	Elderly; Family	Yes & No
<b>Total Number of Assisted Housing Units:</b>	<b>2,824</b>		

2. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs.

Based on the listing of public supported housing shown above, most of the locations of public housing properties are located in previously discussed segregated areas or R/ECAPs. See Chart at #B1 above.

3. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs.

48% of public housing households are black, compared to 44% of renter households. Hispanic households make up 15% of public housing households. Non-Hispanic white households occupy 39% of public housing, considerably less than their share of the total renter population (29%).

4. Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different

demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ?

None of the public housing developments have a significantly different demographic composition, in terms of protected class, other than the following:

- Avenue H – 12 Units – Elderly; Family
- Buell Brown – 95 Units – Elderly; Family
- Garden Terrace – 259 Units - Elderly; Family
- Lawnwood Terrace – 84 Units - Elderly; Family
- Park Terrace – 284 Units - Elderly; Family
- Wildwood Terrace – 60 Units - Elderly; Family
- Various Scattered Sites – 280 Units – Elderly; Family

5. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

There are currently 463 disabled families living in Public Housing. Of those families, 35 occupy all ADA units. There are currently 674 disabled families on the FPHA Public Housing Waiting List and 1,308 disabled families on the Section 8 Waiting List; the pre-application data utilized to populate the Waiting List is basic and does not specifically address ADA needs. Nor do we have a preference that would indicate the need. (Possible Need - HDA accessibility, ADA bathrooms, etc.)

Most immediate needs of residents of Public Housing and Housing Choice voucher holders: As stated above, there are currently 463 disabled families living in public housing properties owned by the Fort Pierce Housing Authority (FPHA). Of those families, 35 occupy all ADA units. There are currently 674 disabled families on the FPHA Public Housing Waiting List and 1,308 disabled families on the Section 8 Waiting List.

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

As stated above, 48% of public housing households are black, compared to 44% of renter households. Hispanic households make up 15% of public housing households. Non-Hispanic white households occupy 39% of public housing, considerably less than their share of the total renter population (29%).

7. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

The Fort Pierce Housing Authority does not segregate race/ethnicity in their housing offerings, therefore, there are no public housing

developments primarily occupied by one race/ethnicity within areas in Fort Pierce that are occupied largely by the same race/ethnicity.

### **c. Disparities in Access to Opportunity**

1. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

To combat a lack of access to opportunities for residents of publicly supported housing in all program categories, the Fort Pierce Housing Authority implemented the U.S. Department of Housing and Urban Development (HUD) program entitled Family Self-Sufficiency (FSS) Program in 1990.

The purpose of this program is to help families (with the help of community services) become self-sufficient by attaining established goals. In this 5-year program (some families need less time), families can establish an escrow account (a savings account) that is often used to help pay for such things as a college education, a car, and/or the down payment on a new home.

The Fort Pierce Housing Authority (FPHA) provides assistance to residents to determine goals that can be reached within five years or less, and refer the residents to resources that can provide assistance in reaching those goals. The FPHA also makes it possible for residents to save money when their rent increases because of an increase in earned income (employment).

FSS Program participant's goals are specific to each person. They are designed to guide participants toward self-sufficiency. The FPHA provides assistance for residents with career counseling to help determine the best careers that will help them succeed in a field that uses natural abilities. An individual's goals can include completing an educational or training program, credit building or repair, personal development, getting a full-time or better-paying job, home ownership, or another idea that suits the participant's own personal dreams.

Life's experiences can change one's goals and aspirations. For this reason, participants can change their goals up to their fourth year in the program. After four years in the program, the goals listed in the participant's file must be completed in order to graduate from the program. Participant's goals are set to represent the individual's goals and dreams.

**Escrow Accounts** – The amount of money a participant can place in their escrow account depends on the individual participant.

To qualify for the program, an applicant must be a Public Housing Resident or a (HCV) Section 8 Voucher holder of the City of Fort Pierce Housing Authority. Section 8 voucher holders who have ported from another housing authority must already be FSS participants in the original housing authority.

**Program Coordinating Committee (PCC)** - The PCC is an advisory committee to the FSS Program. It represents various community organizations. The PCC meets monthly to discuss problems and obstacles that impede the progress of FSS participants, and find creative ways to assist them to become more successful. Among the many things with which these organizations assist participants are: helping with their resumes, finding employment (and training for employment), providing food and clothing, teaching financial literacy, offering educational classes and seminars, and providing credit counseling. When program participants have a need, the PCC is committed to finding resources to assist them.

We were unable to identify any disparities in access to opportunities for persons with disabilities in publicly supported housing.

**d. Additional Information**

1. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly-supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders: There are currently 463 disabled families living in Public Housing. Of those families, 35 occupy all ADA units. There are currently 674 disabled families on the FPHA Public Housing Waiting List and 1,308 disabled families on the Section 8 Waiting List.

2. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

Descriptions of tenant self-sufficiency programs currently underway at the Fort Pierce Housing Authority are listed in #C1 above.

**e. Contributing Factors of Publicly Supported Housing Location and Occupancy**

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

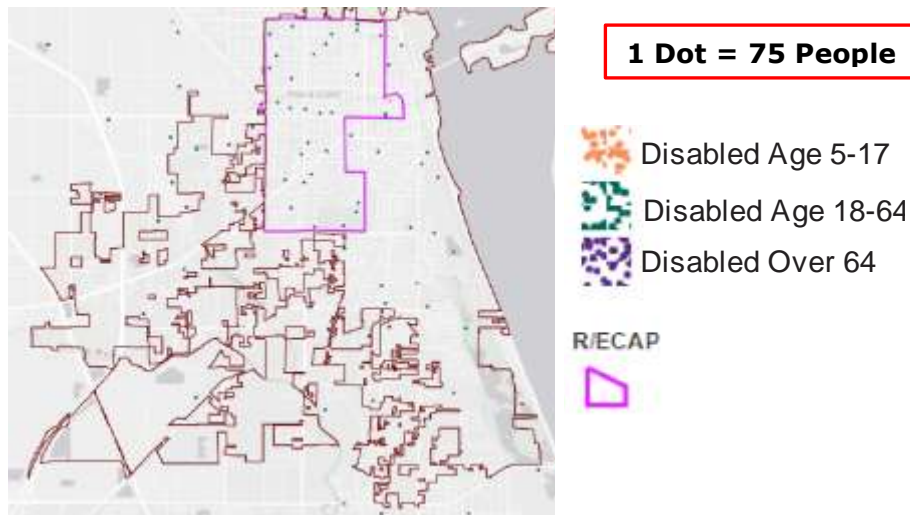
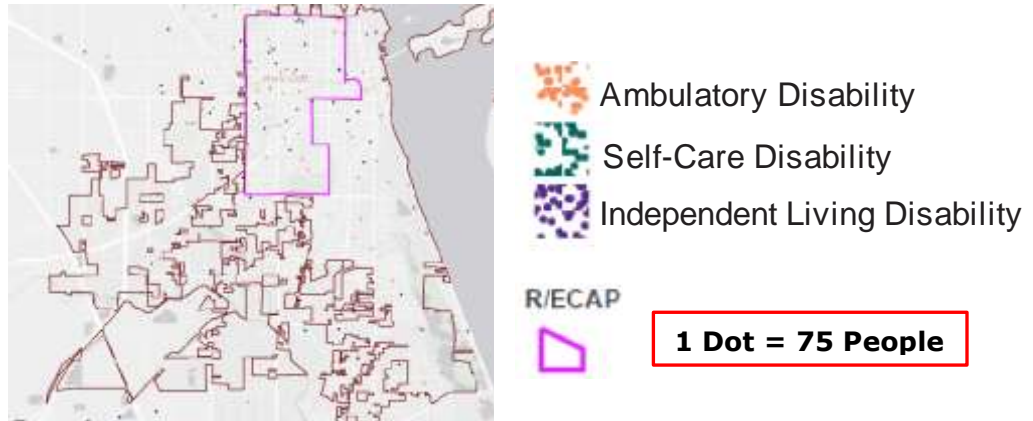
We have not been able to determine any factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues, related to publicly-supported housing, including Segregation, R/ECAPs, and disparities in access to opportunity, or disproportionate housing needs, related to the operation and management of housing units by the Fort Pierce Housing Authority.

## D. Disability and Access Analysis

### a. Population Profile

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

Please see the maps below taken from HUD's Affirmatively Furthering Fair Housing Tool (AFFHT) that show the geographic location within the City of Fort Pierce of people with disabilities:



2. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges. As shown in the 2 maps above, geographic patterns show a greater number of persons with different types of disabilities and persons with disabilities in different age ranges reside in R/ECAPs area within the City of Fort Pierce.

### b. Housing Accessibility

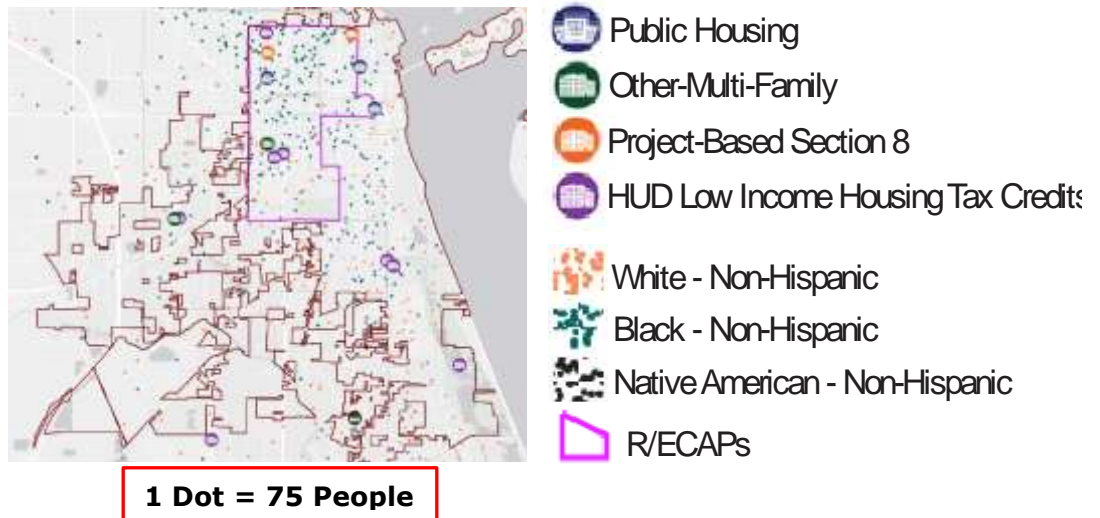
1. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The City of Fort Pierce does not have sufficient affordable, accessible housing in a range of unit sizes.

As stated earlier, the Fort Pierce Housing Authority's Waiting List consists of: Public Housing: 255 Elderly; 674 Disabled; 825 Non-Elderly

or Disabled. Section 8: 254 Elderly; 1,308 Disabled; 7,252 Non-Elderly or Disabled.

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



Please see the map above that shows the location of all affordable accessible housing units within the City of Fort Pierce and color-codes the location of minorities. Yes, the affordable housing units within the City of Fort Pierce do primarily align with R/ECAPs and other areas in the City that are segregated.

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

To the best of our knowledge, persons with different disabilities are able to access in most all of the different categories of publicly supported housing shown in the table on page 49.

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

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

Housing for the disabled in Fort Pierce is in short supply. The Fort Pierce Housing Authority currently has approximately 8,997 applicants on the Section 8 Housing Choice Voucher Waiting List and approximately 1,593 applicants on the Public Housing Units Waiting List. It is undetermined how many of these people have disabilities.

Currently, there are 255 Elderly and 674 Disabled on the FPHA's public housing waiting list and 254 Elderly and 1,308 Disabled on the Section 8 Waiting List.

There is a lack of information regarding where people with disabilities live throughout Fort Pierce. We are hopeful collaborations with the Fort Pierce Housing Authority and area community supportive service organizations will result in providing people with disabilities the opportunity to live more like people without disabilities. This will include providing apartments and homes scattered throughout the community for the disabled that are close available access to flexible services for

these people in their own homes and communities, so that people do not necessarily have to move when their needs change.

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

**Supportive Services** for the disabled in Fort Pierce are provided through the Arc of St. Lucie County. Services include: screening assessment, educational/tutorial assistance, recreational and community awareness activities, transportation and nutrition services.

The Arc also provides Adult Day Training (ADT) programs - opportunities for individuals 22 years of age and older to obtain and improve their skills, which encourages them to access activities and relationships of their choice. The ADT program offers education, community integration, socialization, pre-vocational skills and recreation. Many of the individuals volunteer at local businesses honing their employment skills.

The Arc partners with United Way and Indian River State College (IRSC) to offer a non-credit class, Vocational Education for Students with Disabilities. These classes are taught by an adjunct instructor from the ADT program in a classroom setting at the college. The class teaches the individuals important skills to prepare them for job placement.

The Arc has been a part of our local Transportation Disadvantaged (TD) Coordinating System since 1996. A total of 18 agency vehicles are used to provide daily door to door transportation to children, adolescents, and adults who are enrolled in agency programs.

**Affordable Housing** for the disabled in Fort Pierce is in limited supply. As stated earlier, the Fort Pierce Housing Authority's 'Waiting List' is now closed, meaning, no applications are being taken. The Fort Pierce Housing Authority reported that there were approximately 8,997 applicants on the Section 8 Housing Choice Voucher Waiting List and approximately 1,593 applicants on the Public Housing Units Waiting List.

Currently, there are 255 Elderly and 674 Disabled on the FPHA's public housing waiting list and 254 Elderly and 1,308 Disabled on the Section 8 Waiting List.

#### **d. Disparities in Access to Opportunity**

1. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:
  - a. Government services and facilities
  - b. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
  - c. Transportation
  - d. Proficient schools and educational programs
  - e. Jobs
2. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

**Government services and facilities** – Persons with disabilities are encouraged to contact the City of Fort Pierce and/or regional government offices for assistance in accessing government services and facilities; the City strives to provide accommodations in a timely manner.

**Public Infrastructure** (sidewalks, pedestrian crossings, pedestrian signals) – Persons with disabilities are encouraged to contact the City of Fort Pierce’s Public Works Department, who will work with the citizen to try to improve any accessibility issues related to sidewalks, pedestrian crossings, pedestrian signals, etc.

**Transportation** – The City’s public transit system – The Treasure Coast Connector provides a ‘demand response system’ - which is a origin to destination system where passenger trips are generated by calls from passengers or their agents at least twenty-four (24) hours in advance, to the Transit Reservationists, who then schedules a vehicle to pick up the passenger. This mode of transportation is most helpful for the disabled.

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

Since 2010, the number of complaints has been declining in St. Lucie County/Fort Pierce but over the five-year period the number of reported cases has varied substantially. 35% of complaints from 2007-2012 are based in disability discrimination, 24% for race and 23% for familial status. There are no registered fair housing complaints for either age or color.<sup>19</sup>

#### **e. Disproportionate Housing Needs**

1. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

According to the St. Lucie HOME Consortium’s (St. Lucie County, Martin County and Indian River County), Analysis of Impediments to Fair Housing Choice, published in March, 2014, St. Lucie County is the only member of the HOME Consortium lacking any assisted housing targeting persons with disabilities.

The report also states that ‘Disability is, over the 5-year period and for each county, the largest alleged discriminating factor in fair housing complaints.’

#### **f. Additional Information**

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

Currently, the Fort Pierce Housing Authority – Section 8 waiting list is closed.

Public Housing applications are only being taken for disabled, elderly, or families with 3 or more children. There are currently 674 disabled families on the FPHA Public Housing Waiting List and 1,308 disabled

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<sup>19</sup> Regional Analysis of Impediments to Fair Housing – Part 1

families on the Section 8 Waiting List. The average wait time is six months to over one year.

2. The program participant may also describe other information relevant to its assessment of disability and access issues.

According to the Regional Analysis of Impediments to Fair Housing, Part 1 - Since 2010 the number of complaints has been declining in St. Lucie County; over the last five-year period, the number of reported cases has varied substantially. 35% of complaints from 2007-2012 were based on disability discrimination,

**g. Disability and Access Issues Contributing Factors**

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to:

- Access to publicly supported housing for persons with disabilities
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for transitioning from institutional settings to integrated housing and use and zoning laws
- Lending Discrimination
- Location of accessible housing

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

**a. Analysis**

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

The City of Fort Pierce has none of the following: charges or letters of findings from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

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

**Listed below are Fair Housing Laws for the State of Florida:**

**760.23 Discrimination in the sale or rental of housing and other prohibited practices.—**

- 1) It is unlawful to refuse to sell or rent after the making of a bona fide offer, to refuse to negotiate for the sale or rental of, or otherwise to make unavailable or deny a dwelling to any person because of race, color, national origin, sex, handicap, familial status, or religion.
- 2) It is unlawful to discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, national origin, sex, handicap, familial status, or religion.
- 3) It is unlawful to make, print, or publish, or cause to be made, printed, or published, any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, national origin, sex, handicap, familial status, or religion or an intention to make any such preference, limitation, or discrimination.
- 4) It is unlawful to represent to any person because of race, color, national origin, sex, handicap, familial status, or religion that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- 5) It is unlawful, for profit, to induce or attempt to induce any person to sell or rent any dwelling by a representation regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, national origin, sex, handicap, familial status, or religion.
- 6) The protections afforded under ss. 760.20-760.37 against discrimination on the basis of familial status apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.
- 7) It is unlawful to discriminate in the sale or rental of, or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap of:
  - a) That buyer or renter;
  - b) A person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
  - c) Any person associated with the buyer or renter.
- 8) It is unlawful to discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, because of a handicap of:
  - a) That buyer or renter;
  - b) A person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
  - c) Any person associated with the buyer or renter.
- 9) For purposes of subsections (7) and (8), discrimination includes:
  - a) A refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be

- occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises; or
- b) A refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.
- 10) Covered multifamily dwellings as defined herein which are intended for first occupancy after March 13, 1991, shall be designed and constructed to have at least one building entrance on an accessible route unless it is impractical to do so because of the terrain or unusual characteristics of the site as determined by commission rule. Such buildings shall also be designed and constructed in such a manner that:
- a) The public use and common use portions of such dwellings are readily accessible to and usable by handicapped persons.
  - b) All doors designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by a person in a wheelchair.
  - c) All premises within such dwellings contain the following features of adaptive design:
    - 1. An accessible route into and through the dwelling.
    - 2. Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations.
    - 3. Reinforcements in bathroom walls to allow later installation of grab bars.
    - 4. Usable kitchens and bathrooms such that a person in a wheelchair can maneuver about the space.
  - d) Compliance with the appropriate requirements of the American National Standards Institute for buildings and facilities providing accessibility and usability for physically handicapped people, commonly cited as ANSI A117.1-1986, suffices to satisfy the requirements of paragraph (c). State agencies with building construction regulation responsibility or local governments, as appropriate, shall review the plans and specifications for the construction of covered multifamily dwellings to determine consistency with the requirements of this subsection.

**321. 760.24 Discrimination in the provision of brokerage services.**--It is unlawful to deny any person access to, or membership or participation in, any multiple-listing service, real estate brokers' organization, or other service, organization, or facility relating to the business of selling or renting dwellings, or to discriminate against him or her in the terms or conditions of such access, membership, or participation, on account of race, color, national origin, sex, handicap, familial status, or religion.

**760.25 Discrimination in the financing of housing or in residential real estate transactions.**—

- 1) It is unlawful for any bank, building and loan association, insurance company, or other corporation, association, firm, or enterprise the business of which consists in whole or in part of the making of

commercial real estate loans to deny a loan or other financial assistance to a person applying for the loan for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling, or to discriminate against him or her in the fixing of the amount, interest rate, duration, or other term or condition of such loan or other financial assistance, because of the race, color, national origin, sex, handicap, familial status, or religion of such person or of any person associated with him or her in connection with such loan or other financial assistance or the purposes of such loan or other financial assistance, or because of the race, color, national origin, sex, handicap, familial status, or religion of the present or prospective owners, lessees, tenants, or occupants of the dwelling or dwellings in relation to which such loan or other financial assistance is to be made or given.

- 2) a) It is unlawful for any person or entity whose business includes engaging in residential real estate transactions to discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction, because of race, color, national origin, sex, handicap, familial status, or religion.  
b) As used in this subsection, the term "residential real estate transaction" means any of the following:
- 3) The making or purchasing of loans or providing other financial assistance:
  - a) For purchasing, constructing, improving, repairing, or maintaining a dwelling; or
  - b) Secured by residential real estate.
    - 1) The selling, brokering, or appraising of residential real property.

**Listed below are the Fair Housing Ordinances for the City of Fort Pierce:**

**Sec. 11-50. - Discrimination in housing—Unlawful practice.**

In connection with any of the transactions set forth in this section which affect any housing operation, or in connection with any sale, purchase, rental or lease of any housing accommodation, it shall be an unlawful discriminatory practice for a person, owner, financial institution, real estate broker or real estate salesman, or any representative of the above, within the City of Fort Pierce, to engage in, assist or conspire to do any of the following proscribed actions or activities;

- 1) Refuse to sell, purchase, rent or lease or otherwise deny to or withhold any housing accommodation from a person, or to evict a person because of race, color, religion, ancestry, age, sex, marital status, place of birth, handicap, familial status, national origin; or
- 2) (2)To discriminate against a person on the basis of race, color, religion, ancestry, age, sex, marital status, place of birth, handicap, familial status, or national origin in the terms, conditions or privileges of the sale, purchase, rental or lease of

any housing accommodations or in the furnishing of facilities or service in connection therewith; or

- 3) To refuse to receive or transmit a bona fide offer to sell, purchase, rent or lease any housing accommodation from or to a person because of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin; or
- 4) (4)To evict a person because of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin; or
- 5) To refuse to negotiate for the sale, purchase, rental or lease of any housing accommodation to or from a person because of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin; or
- 6) To represent to a person that any housing accommodation is not available for inspection, sale, purchase, rental or lease when in fact it is so available, because of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin; or
- 7) To refuse to permit a person to inspect any housing accommodation because of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin when such a dwelling is in fact available to persons who are financially qualified; or
- 8) To make, publish, print, circulate, post or mail, or cause to be made, published printed, circulated, posted or mailed, any notice, statement or advertisement, or to announce a policy, or to sign or to use a form of application for the sale, purchase, rental, lease or financing of any housing accommodation, or to make a record of inquiry in connection with the prospective sale, purchase, rental, lease or financing of any housing accommodation, which indicates any discrimination or any intent to discriminate on the basis of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin; or
- 9) To offer, solicit, accept or use a listing of any housing accommodation for sale, purchase, rental or lease with actual knowledge that a person may be subjected to discrimination on the basis of race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin in connection with such sale, purchase, rental or lease, or in the furnishing of facilities or service in connection therewith; or
- 10) For profit to directly or indirectly induce or discourage, or directly or indirectly attempt to induce or discourage, the sale, purchase, rental, lease or the listing of any housing accommodation by representing that the presence or anticipated presence of persons of any particular race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin, in the area to be affected by such sale, purchase, rental or lease will result in:

- a) The lowering of property values in the area; or
  - b) The increase in criminal or antisocial behavior in the area;  
or
  - c) A decline in the quality of the schools serving the area.
- 11) For profit to induce or discourage, or to attempt to induce or discourage, the sale, purchase, rental, lease or the listing or advertising for any of the above, of any housing accommodation in an area by representing that the presence or anticipated presence in that area of persons of any particular race, color, religion, ancestry, sex, age, marital status, place of birth, familial status, handicap or national origin is reason for panic, unrest or fear on the part of those residing within the area; or
  - 12) For any bank, building and loan association, insurance company or other corporation, association, firm or enterprise doing business in the city, in whole or in part, in making of commercial real estate loans, to deny a loan or other financial assistance to a person applying therefor for the purpose of purchasing, constructing, improving, repairing or maintaining a dwelling, or to discriminate against such person in the fixing of the amount, interest rate, duration or other terms or conditions of such loans or other financial assistance, because of the race, color, religion, ancestry, national origin, age, sex, place of birth, familial status, handicap or marital status of such person or any persons associated with the applicant in connection with such loan or other financial assistance or the purpose of such loan or other financial assistance, or of the present or prospective owners, lessees, tenants or occupants of the dwelling or dwellings in relation to which such loan or other financial assistance is to be made or given; or
  - 13) To deny any qualified person access to, or membership or participation in, any multiple listing service, real estate broker's organization, or other service, organization or facility relating to the business of selling or renting dwellings, or to discriminate against such person in the terms or conditions of such access, membership or participation on account of race, color, religion, ancestry, age, marital status, sex, place of birth, familial status, handicap or national origin; or
  - 14) To otherwise deny to or withhold any housing accommodation from a person because of race, color, religion, ancestry, national origin, age, sex, handicap, marital status, familial status or place of birth.
  - 15) Directly or indirectly, to refuse, withhold from, deny or deprive, or attempt to withhold from, deny or deprive any person any of the goods, services, facilities, privileges, advantages and accommodations of any place of public accommodation.
  - 16) Directly or indirectly, to segregate any person at a place of public accommodation, or to segregate any person in regards to the goods, services, facilities, privileges, advantages and accommodations of any place of public accommodation.

- 17) To intimidate, threaten, coerce or interfere, or attempt to intimidate, threaten, coerce or interfere with any person in the exercise of, enjoyment of, or on account of such person having aided or encouraged any other person in the exercise of enjoyment of, any right granted or protected by the provisions in this section.
- 18) To discriminate in the sale or rental, or otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap of that buyer or renter or any person associated with that buyer or renter. For purposes of this subsection, discrimination includes:
  - a) A refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear expected;
  - b) A refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling; or
  - c) In connection with the design and construction of covered multifamily dwellings for first occupancy after March 13, 1991, a failure to design and construct those dwellings in such a manner that:
    1. The public use and common use portions of such dwellings are readily accessible to and usable by handicapped persons;
    2. All doors designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by handicapped in wheelchairs; and
    3. All premises within such dwellings contain the following features of adaptive design:
      - i. An accessible route into and through the dwelling;
      - ii. Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
      - iii. Reinforcements in bathroom walls to allow later installation of grab bars; and;
      - iv. Usable kitchens and bathrooms such that an individual in wheelchair can maneuver about the space.
    4. Compliance with the appropriate requirement of the American National Standard for buildings and facilities providing accessibility and usability for physically handicapped people, commonly cited as ANSI A117.1-

1986, suffices to satisfy the requirements of paragraphs (3)c.3.

5. The city shall review all plans for new construction of covered multifamily housing for the purpose of making determinations as to whether the design and construction requirements of paragraph (3)c. are met. Based on such determination, the city may approve the new construction if the requirements of paragraph (3)c. are met, and may deny the new construction if those requirements are not met.
6. Nothing in this subsection requires that a dwelling be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.

(Ord. No. I-207, § 1, 3-2-87; Ord. No. J-248, § 2, 4-7-97)

Ord. No. I-207, adopted Mar. 2, 1987, did not specifically amend this Code; hence, the provisions of section 1 of the ordinance have been codified herein as § 11-50 at the discretion of the editor.

**Sec. 11-51. - Same—Limitations and exemptions.**

- a) Nothing in section 11-50 shall prohibit a religious organization, association or society or any nonprofit institution or organization operating, supervised or controlled by or in conjunction with a religious organization, association or society from limiting the sale, rental or occupancy of dwellings which it owns or operates for other than a commercial purpose to persons of the same religion, or from giving preference to such persons.
- b) Nothing in section 11-50 shall apply to a building which contains not more than two (2) units, one (1) of which is occupied by the owner of such building as his or her residence.
- c) Nothing in section 11-50 shall apply to a building which contains four (4) or less rooming housing units, one (1) of which is occupied by the owner of such building as his or her residence. As used herein, a rooming house unit shall be defined as a unit of three (3) or less rooms where one (1) of such rooms may contain kitchen facilities. However, there may be a single kitchen facility located within the building which may be exclusively reserved for the use of the owner-occupant or its use may be shared by the residents of the building.
- d) Notwithstanding any other provisions of section 11-50, it shall not be an unlawful discriminatory practice for a person or owner or any representative of the above to refuse to rent a dwelling unit to an unmarried pair of individuals where one (1) of said pair is of a different sex than the other.
- e) Nothing in section 11-50 shall require housing complexes that establish a bona fide policy of limiting their tenants to persons of certain age groups to admit people from other age groups. The term "housing complexes," as used in this exemption, shall

mean buildings containing two (2) or more dwelling units, each of which is intended for permanent residence by persons or families living independently of each other. Any bona fide policy pertaining to age shall be in writing and the applicability of such a policy shall be stated in all listings, offerings and advertisements pertaining to such housing complexes or dwelling units within such housing complexes.

- f) The prohibitions of section 11-50 with respect to age shall not be applicable when the individual alleged to have suffered age discrimination is not if the age of majority or otherwise emancipated or sui juris.
- g) It shall not be a violation of section 11-50 for a person to discriminate because of sex when advertising or entering into a contract for the sharing of a single-family dwelling.
- h) Notwithstanding any other provisions of section 11-50, it shall not be an unlawful discriminatory practice for a landlord or lessor to refuse to rent or lease to any person if the rental or leasing to said person shall constitute an undue peril to the person or property of said person, other tenants, the landlord or lessor or the public at large. However, this exemption shall not apply if the prospective tenant is willing to execute a release and indemnification agreement to protect the landlord or lessor, thereby relieving said landlord or lessor of any liability and agreeing to indemnify him from any damage that may be incurred or result from the said undue perils as a condition of the lease being granted. Any such indemnification agreement shall be guaranteed by a solvent surety in a reasonably sufficient amount to afford the protection it purports to give.
- i) Nothing in section 11-50 shall be applied to:
  - 1. Discrimination on the basis of sex in restrooms, shower rooms, bath houses, health spas, or similar facilities which are by their nature distinctly private, or dormitory-lodging facilities;
  - 2. A religious organization, association or society or any nonprofit institution or organization operating, supervised or controlled by or in conjunction with a religious organization, association or society, from limiting facilities and accommodations which it owns or operates, for other than a commercial purpose, to persons of the same religious organization or from giving preference to such persons. However, this exception shall not apply if such religious organization, association, society, or any nonprofit, charitable, or educational institution or organization operated, supervised or controlled by or in conjunction with a religious organization, restricts membership in its organization on the basis of race, color, or national origin.
- j) Nothing in section 11-50 shall prohibit the limiting of the use of kindergartens, nurseries, day care centers, theaters and motion picture houses to persons of a particular age group.

(Ord. No. I-207, § 2, 3-2-87; Ord. No. J-248, 4-7-97)\

Ord. No. I-207, adopted Mar. 2, 1987, did not specifically amend this Code; hence the provisions of section 2 of the ordinance have been codified herein as section 11-51 at the discretion of the editor.

**Sec. 11-51.1. - Same—Administrative enforcement.**

- a) *Complaints and answers.* Complaints in reference to violations of provisions in sections 11-50 and 11-51 shall be filed with the City of Fort Pierce and handled as follows:
    - 1) An aggrieved person may, not later than one year after an alleged discriminatory housing practice has occurred or terminated, file a complaint with the city alleging such discriminatory housing practice.
    - 2) Upon the filing of such a complaint:
      - a. The city shall receive complaints from the aggrieved person acknowledging such receipt and advising the aggrieved person of the choice of forums provided under this article;
      - b. The city shall, not later than ten (10) days after receipt of such filing, forward the complaint to the Florida Human Rights Commission for processing and proper disposition.
    - 3) Complaints and answers shall be in writing, under oath or affirmation, in the form prescribed by the city, and may be reasonable and fairly amended at any time.
  - b) *Investigation.* City staff will not investigate complaints.
  - c) *Conciliation.*
    - 1) During the period beginning with the filing of such complaint and ending with the filing of a charge or a dismissal by the state, the state shall, to the extent feasible, engage in conciliation with respect to such complaint.
    - 2) A conciliation agreement arising out of such conciliation shall be an agreement between the respondent and the complainant, and shall be subject to approval by the Florida Human Rights Commission.
    - 3) A conciliation agreement may provide for binding arbitration of the dispute arising from the complaint. Any such arbitration that results from a conciliation agreement may award appropriate relief, including monetary relief.
  - d) *Prohibitions and requirements with respect to disclosure of information.* Nothing said or done in the course of conciliation under this section may be made public or used as evidence in a subsequent proceeding under this section without the written consent of the persons concerned.

(Ord. No. J-248, § 5, 4-7-97)
3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

City of Fort Pierce, Florida, Department of Urban Redevelopment, 100 N. U.S. Hwy. 1, Fort Pierce 34950 – (772) 467-3169 / Hearing or speech impaired may use the Florida Relay System by dialing 711.

**Resources Available** – Fair Housing Public Service Announcements in English and Spanish; Advertisements in local community newsletters; Q&A on Fair Housing Discrimination; Assistance on filing Fair Housing Complaints

Florida Department of Economic Opportunity Neighborhood Stabilization Program – Jeannie Russell, Program Manager 850-717-8440

**Resources Available** – Fair Housing Public Service Announcements; downloadable Q&A on Fair Housing issues; Downloadable forms to file Fair Housing Complaints; telephone number to call with questions/assistance.

Legal Aid Society of Palm Beach County, Inc. - 423 Fern Street, Suite 200 - West Palm Beach, FL 33401 - (561) 655-8944

**Resources Available** – Fair Housing Public Service Announcements; downloadable Q&A on Fair Housing issues; Downloadable forms to file Fair Housing Complaints; telephone number to call with questions and/or assistance.

Orlando Human Relations Department - 400 South Orange Avenue, Orlando, FL 32801 - (407) 246-2122

**Resources Available** - Fair Housing Public Service Announcements; downloadable Q&A on Fair Housing issues; Downloadable forms to file Fair Housing Complaints; telephone number to call with questions and/or assistance.

HUD.gov / Office of Fair Housing and Equal Opportunity - 451 7th Street S.W., Washington, DC 20410 - Telephone: (202) 708-1112 - TTY: (202) 708-1455

**Resources Available** - Fair Housing Public Service Announcements; downloadable Q&A on Fair Housing issues; Downloadable forms to file Fair Housing Complaints; telephone number to call with questions and/or assistance.

#### **b. Additional Information**

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

Please refer to the answer to number 3, above.

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

The City of Fort Pierce currently does the following to promote Fair Housing:

- a. Prominently displays signage in the City Hall Lobby promoting Fair Housing in English and Spanish;
- b. Provides detailed information on City website on Fair Housing, including Q&A's, and information on filing Fair Housing complaints;

- c. Collaborates with area Lending Consortium providers to provide Fair Housing information during First-Time Homebuyer Workshops;
  - d. Distributes Fair Housing brochures in City Hall lobby promoting Fair Housing in English and Spanish
  - e. Airs HUD approved Fair Housing commercials on City TV Station in English and Spanish.
3. Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.
- Lack of local private fair housing outreach and enforcement
  - Lack of local public fair housing enforcement

## **VI. Fair Housing Goals and Priorities**

- A.** For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

The prioritization of the contributing factors to individual impediments to fair housing choice listed below were determined based on the impediments that received the highest ranking, per the St. Lucie County Consortium Analysis of Impediments of Fair Housing Choice, created March, 2014; the Regional Analysis of Impediments of Fair Housing, created October, 2012, and from information garnered from City of Fort Pierce Fair Housing Survey results, one-on-one interviews and group presentations/meetings.

### **Impediment #1 – Housing/Lending Discrimination on the basis of Race, Color, National Origin, Religion, Sex, Familial Status and Disability**

**Priority #1 Contributing Factor:** Housing complaints based on discrimination against disability ranked the highest, with racially-based complaints ranking second. Disability is, over the 5-year period, the largest alleged discriminating factor in fair housing complaints.

**Priority #2 Contributing Factor:** Race-based complaints ranked second.

Hispanic or Latino loan applicants received loan denials at a higher rate than non-Hispanic loan applicants, with the Hispanic loan denial rate outpacing the non-Hispanic loan denial rate by 3.54 percentage points in 2013. Hispanics received loan originations at a lower rate than non-Hispanics, with the Hispanic loan origination rate falling 5.18 percentage points behind the non-Hispanic loan origination rate in 2013.

**Priority #3 Contributing Factor:** Sub-Prime/High Cost Loans Ranked third.

African American loan applicants had the highest rate of subprime/high cost loans in the year 2013 at 3.1% of all its racial category loan originations.

Native Hawaiian or Other Pacific Islander loan applicants had the lowest rates of subprime/high cost loans in at 0% of all racial category loan originations.

**Priority #4 Contributing Factor:** Discrimination against people in protected classes by real estate and other housing professionals ranked fourth.

This discrimination may go undetected and unaddressed if not adequately monitored and enforced. Considering the growing number of residents in protected classes, there is greater need for fair housing awareness, education and enforcement opportunities.

**Impediment #2 – Shortage of Affordable / Decent Housing Opportunities**

**Priority #1 – Contributing Factor:** Severe Shortage of Affordable/Decent Housing in non-Segregated Areas.

**Impediment #3 – Lack of Knowledge, Awareness of, or Education on Fair Housing Protections**

**Priority #1 – Contributing Factor:** This impediment was found to be the most common one within the City of Fort Pierce. Many potential homeowners lack the understanding of the path to homeownership, and a majority of loan denials are due to avoidable issues, such as incomplete loan applications, unverifiable information and collateral.

**Impediment #4 – Fair and Equal Lending Disparities**

**Priority #1 – Contributing Factor:** Data indicates regular disparities on loan approvals and denials by race and by Hispanic/non-Hispanic ethnicity. As the data indicates, African Americans and Hispanics tend to have higher loan application failure rates.

**Impediment #5 – Housing Market Segregation**

**Priority #1 – Contributing Factor:** Geographically-segregated areas exist within the City of Fort Pierce.

When families with limited means become geographically isolated, the jurisdictions where they live have reduced tax capacity and that in turn means there will be fewer good-quality public services for those families. Additionally, research nationally finds that increasing economic segregation increases the performance of children from high-income families and reduces the educational attainment of students from low-income families.

As the quality of public services begins to vary more across communities, neighborhoods may have a difficult time attracting middle-income residents, and the potential for a downward spiral becomes very real. Over time, the process of neighborhood change can concentrate poverty in a few neighborhoods.

Segregation in the housing market limits the supply of housing available to the 'protected class', and therefore drives up the price of housing available to the 'protected class'.

**Priority #2 – Contributing Factor:** Lack of Decent Affordable Housing in higher income areas.

Rapidly rising housing costs have created a significant loss of low-cost rental housing in the City over the last decade, yet there has been little growth in wages for many residents, which means that rent is increasingly eating away at household budgets. As the City's growing cost of living continues to outpace incomes, more and more residents struggle to pay for housing while also meeting other necessities like food, clothing, health care, and transportation. The lack of affordable housing threatens the physical and mental health of families, makes it harder for adults to find and keep jobs, creates instability for children, making it

hard to focus at school, and leaves many people at risk of homelessness at any given moment.

**Priority #3 – Contributing Factor:** Neighborhood 'Redlining' by the Federal Government, Realtors, Bankers, etc.

Segregation has been reinforced by a conscious policy of neighborhood 'redlining', by the Federal government, so the lack of loans and investment and credit in the inner city has robbed generations of Blacks and other members of the protected class of the benefits of home ownership.

**Priority #4 – Contributing Factor:** Subprime Lending; Reverse Redlining

Subprime lending is defined as higher than average rate loans given to persons who are of higher credit risk due to less than satisfactory credit. The higher rate regularly referred as "higher cost" reflects the increased risk of lending to a loan applicant with less than satisfactory credit. There are other indicators of subprime loans besides the loan rate being higher than average. Like the potential for the loan to reset to much higher rates in the future. Subprime lending is more prevalent in minority-majority neighborhoods than in non-minority majority neighborhoods, suggesting an overrepresentation of minority recipients of mortgages that are subprime in nation. Because of the apparent concentration of subprime loans in minority Current Fair Housing Profile neighborhoods and among minority loan applicants, it has been argued that subprime lenders target minority communities through 'reverse redlining'.

**B.** For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

<b>Impediment #1 – Housing/Lending Discrimination on the basis of Race, Color, National Origin, Religion, Familial Status and Disability</b>				
<b>Goal</b>	<b>Contributing Factors</b>	<b>Fair Housing Issues</b>	<b>Metrics, Milestones, and Timeframe for Achievement</b>	<b>Responsible Participant(s)</b>
Work to Eliminate Housing/Lending Discrimination in Fort Pierce.	Priority #1 – Discrimination Based on Disability Priority #2 – Discrimination Based on Race Priority #3 – Sub-Prime, High-Cost Loans based on race/ethnicity Priority #4 – Discrimination against people in protected classes	Housing/Lending Discrimination on basis of race, color, national origin, religion, sex familial status and disability	1) During 2016-2020, provide at least two Fair Housing Workshops during each program year; feature information on types of discrimination, 'redlining', 'reverse redlining', sub-prime, high-cost loans, protected classes, how to file a fair housing complaint, etc.; 2) During 2016-2020, promote and provide at least four First Time Homebuyer Workshops during each program year; 3) During 2016-2020, provide Fair Housing Complaint Forms in English and Spanish – throughout each program year; 4) During 2016-2020, provide Fair Housing information to lending consortiums throughout area throughout each program years; 5) During 2016-2020, request the local newspapers print HUD-approved Fair Housing Notices, in English and Spanish in the real estate section once each quarter during program years; 6) During 2016-2020, provide HUD-approved Fair Housing commercials on the City's Public Access television channel, in English and Spanish throughout program years; 7) During 2016-2020, publish Fair Housing information in non-profit community newspapers throughout the program years, in English and Spanish; 8) During 2016-2020, provide Fair Housing brochures, posters, etc. at all City-sponsored events and at City Hall; and 9) During 2016-2020, forward all Fair Housing complaints that are received directly to HUD for investigation.	City of Fort Pierce Department of Urban Redevelopment
<p><u>Discussion:</u> Housing discrimination complaints based on disability ranked the highest in Fort Pierce. Race-based Fair Housing complaints ranked second. Sub-Prime high cost loans ranked third. Discrimination against people in protected classes by real estate and other housing professionals ranked fourth.</p>				

**Impediment #2 – Shortage of Affordable / Decent Housing Opportunities**

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Participant(s)
<p>Increase the number of affordable housing units within the City of Fort Pierce.</p>	<p>Priority #1 – Severe shortage of affordable/ decent housing in segregated and non-segregated areas.</p>	<p>Lack of Affordable, Decent Housing for Lower-income Citizens in non-segregated areas.</p>	<ol style="list-style-type: none"> <li>1) During 2016-2017 program year, introduce a resolution for City of Fort Pierce Commission for Inclusionary Housing, an affordable housing tool that links the production of affordable housing to the production of market-rate housing; requiring new residential developments to include a certain percentage of affordable housing units;</li> <li>2) During 2016-2020 continue providing weatherization program funding through CDBG and partnerships with Fort Pierce Utilities Authority and the Centro Campesino to lower income citizens to improve home capacity to protect against the elements and reduce utility bills for lower-income residents;</li> <li>3) During 2016-2020, continue using State Housing Initiatives Partnership (SHIP) funds to rehabilitate owner-occupied homes belonging to lower-income citizens;</li> <li>4) During 2016-2020, provide SHIP funds for down-payment and closing cost assistance for lower-income citizens;</li> <li>5) During 2016-2020, promote information at lending consortium meetings on affordable housing needs within the City of Fort Pierce;</li> <li>6) During 2016-2020, provide CDBG funds as 'cash match' for Fort Pierce Housing Authority to apply for tax credits to rehabilitate an old abandoned hospital into a living facility for lower-income senior citizens;</li> <li>7) During 2016-2020, continue to identify regional partners with similar affordable housing interests and potentially provide a fair housing center to provide ongoing education and enforcement programs;</li> <li>8) During 2016-2020, continue funding Code Enforcement services to assess, and enforce current codes for landlord maintenance of property; and</li> <li>9) During 2016-2020, continue to explore ways to increase the amount of affordable housing throughout the City, including examining ways to increase the amount of housing stock that is barrier free and ADA compliant.</li> </ol>	<p>City of Fort Pierce Department of Urban Redevelopment</p>

Discussion: The Fort Pierce Housing Authority reports that there are approximately 8,997 applicants on the Section 8 Housing Choice Voucher Waiting List and approximately 1,593 applicants on the Public Housing Units Waiting List. The FPHA Housing Choice Voucher Waiting List is currently closed. It was last open for three days in May, 2015.

**Impediment #3 – Lack of Knowledge, Awareness of, or Education on Fair Housing Protections**

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Participant(s)
<p>Increase knowledge and awareness of fair housing protections and path to homeownership</p>	<p>Priority #1 – Citizens lack understanding of the path to homeownership and are unaware of fair housing protections</p>	<p>The Fair Housing Act protects people from discrimination when they are renting, buying, or securing financing for any housing, because of race, color, national origin, religion, sex, disability and the presence of children.</p>	<ol style="list-style-type: none"> <li>1) During 2016-2020, provide at least two Fair Housing Workshops during each program year; feature information on types of discrimination, 'redlining', 'reverse redlining', sub-prime, high-cost loans, protected classes, how to file a fair housing complaint, etc.;</li> <li>2) During 2016-2020, promote and provide at least four First Time Homebuyer Workshops during each program year;</li> <li>3) During 2016-2020, provide Fair Housing Complaint Forms in English and Spanish – throughout each program year;</li> <li>4) During 2016-2020, provide Fair Housing information to lending consortiums throughout area throughout each program years;</li> <li>5) During 2016-2020, request the local newspapers print HUD-approved Fair Housing Notices, in English and Spanish in the real estate section once each quarter during program years;</li> <li>6) During 2016-2020, provide HUD-approved Fair Housing commercials on the City's Public Access television channel, in English and Spanish throughout program years;</li> <li>7) During 2016-2020, publish Fair Housing information in non-profit community newspapers throughout the program years, in English and Spanish;</li> <li>8) During 2016-2020, provide Fair Housing brochures, posters, etc. at all City-sponsored events and at City Hall;</li> <li>9) During 2016-2020, we will continue updating the fair housing webpage on the City of Fort Pierce website;</li> <li>10) During 2016-2020, the Fort Pierce City Commission will proclaim April of each year Fair Housing month; display Fair Housing posters throughout City Hall; and</li> <li>11) During 2016-2020, forward all Fair Housing complaints that are received directly to HUD for investigation.</li> </ol>	<p>City of Fort Pierce Department of Urban Redevelopment</p>

Discussion: This impediment was found to be the most common one within the City of Fort Pierce. Many potential homeowners lack the understanding of the path to homeownership, and a majority of loan denials are due to avoidable issues, such as incomplete loan applications, unverifiable information and collateral.

### **Impediment #4 – Fair and Equal Lending Disparities**

<b>Goal</b>	<b>Contributing Factors</b>	<b>Fair Housing Issues</b>	<b>Metrics, Milestones, and Timeframe for Achievement</b>	<b>Responsible</b>
Promote Fair and Equal Lending Disparities	Priority #1 – Potential homebuyers are being turned down for lack of collateral, debt-to-income ratio and incomplete applications.	Disparities on loan approvals and denials by race and by Hispanic/ non-Hispanic ethnicity. African Americans and Hispanics tend to have higher loan application failure rates.	<ol style="list-style-type: none"> <li>1) During 2016-2020, work with all members of St. Lucie County and Martin County Lending Consortiums to increase awareness of prevalent denial issues;</li> <li>2) During 2016-2020, continue to provide referrals to credit counseling agencies to improve credit ratings, and debt-to-income ratios, for homeownership potential;</li> <li>3) During 2016-2020, continue to provide promotional information for First-Time Homebuyer Workshops through public access venues;</li> <li>4) During 2016-2020, promote and hold at least two (2) Fair Housing / Homeowner educational events each year.</li> <li>5) During 2016-2020, promote and provide at least four First Time Homebuyer Workshops during each program year.</li> <li>6) During 2016-2020, promote financial literacy educational events within the City of Fort Pierce; and</li> <li>7) During 2016-2020, provide down payment and closing cost assistance to first-time homebuyers through the State Housing Initiatives Partnership (SHIP) program.</li> </ol>	City of Fort Pierce Department of Urban Redevelopment

Discussion: The most prevalent reasons for loan application denials in the City of Fort Pierce are the loan applicant’s collateral, debt-to-income ratio, and incomplete applications.

### **Impediment #5 – Housing Market Segregation**

<b>Goal</b>	<b>Contributing Factors</b>	<b>Fair Housing Issues</b>	<b>Metrics, Milestones, and Timeframe for Achievement</b>	<b>Responsible</b>
Eliminate Segregated Neighborhoods in Fort Pierce	<p>Priority #1 – Lack of amenities in lower-income minority neighborhoods.</p> <p>Priority #2 – Lack of public and private investment in lower-income minority neighborhoods</p> <p>Priority #3 – Housing and Mortgage Market Discrimination</p>	Housing Market Segregation	<ol style="list-style-type: none"> <li>1) During 2016-2020, continue ‘creative placemaking initiative’- self-guided cultural history trails, events we promote across the U.S., commercial façade grants, beautification projects, art shows, festivals, etc., in segregated neighborhoods;</li> <li>2) During 2016-2020, provide land and incentives for investment development of grocery, retail, and other businesses in segregated neighborhoods;</li> <li>3) During 2016-2020, continue collaborations with investors, developers and St. Lucie County to develop artist live/work areas in segregated historic neighborhoods;</li> <li>4) During 2016-2020, work with the local Board of Realtors and Lending Consortium to promote Fair Housing.</li> <li>5) Work with local Affordable Housing Advisory Committee to promote ways to enhance local land development regulations to augment fair housing.</li> </ol>	City of Fort Pierce Department of Urban Redevelopment

Discussion: As in many cities across the United States, historical geographical segregation areas still exist in Fort Pierce. Activities geared toward creating open and inclusive neighborhoods will continue to be a high priority for the City of Fort Pierce.

## **APPENDIX A – HUD PROVIDED MAPS**

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- Map 1 Race/Ethnicity** – Current (2010) race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
- Map 2 Race/Ethnicity Trends** – Past (1990 and 2000) race/ethnicity dot density maps for Jurisdiction and Region with R/ECAPs
- Map 3 National Origin** – Current 5 most populous national origin groups dot density map for Jurisdiction and Region with R/ECAPs
- Map 4 LEP** – LEP persons by 5 most populous languages dot density map for Jurisdiction and Region with R/ECAPs
- Map 5 Publicly Supported Housing and Race/Ethnicity** – Public Housing, Project Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color, for the Jurisdiction and Region
- Map 6 Housing Choice Vouchers and Race/Ethnicity** – Housing Choice Vouchers with race/ethnicity dot density map and R/ECAPs, for the Jurisdiction and Region
- Map 7 Housing Burden and Race/Ethnicity** – Households experiencing one or more housing burdens in Jurisdiction and Region with race/ethnicity dot density map and R/ECAPs
- Map 8 Housing Burden and National Origin** – Households experiencing one or more housing burdens in Jurisdiction and Region with national origin dot density map and R/ECAPs
- Map 9 Demographics and School Proficiency** – School proficiency thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs
- Map 10 Demographics and Job Proximity** – Job proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs
- Map 11 Demographics and Labor Market Engagement** – Labor engagement thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs
- Map 12 Demographics and Transit Trips** – Transit proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs
- Map 13 Demographics and Low Transportation Costs** – Low transportation cost 2 thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

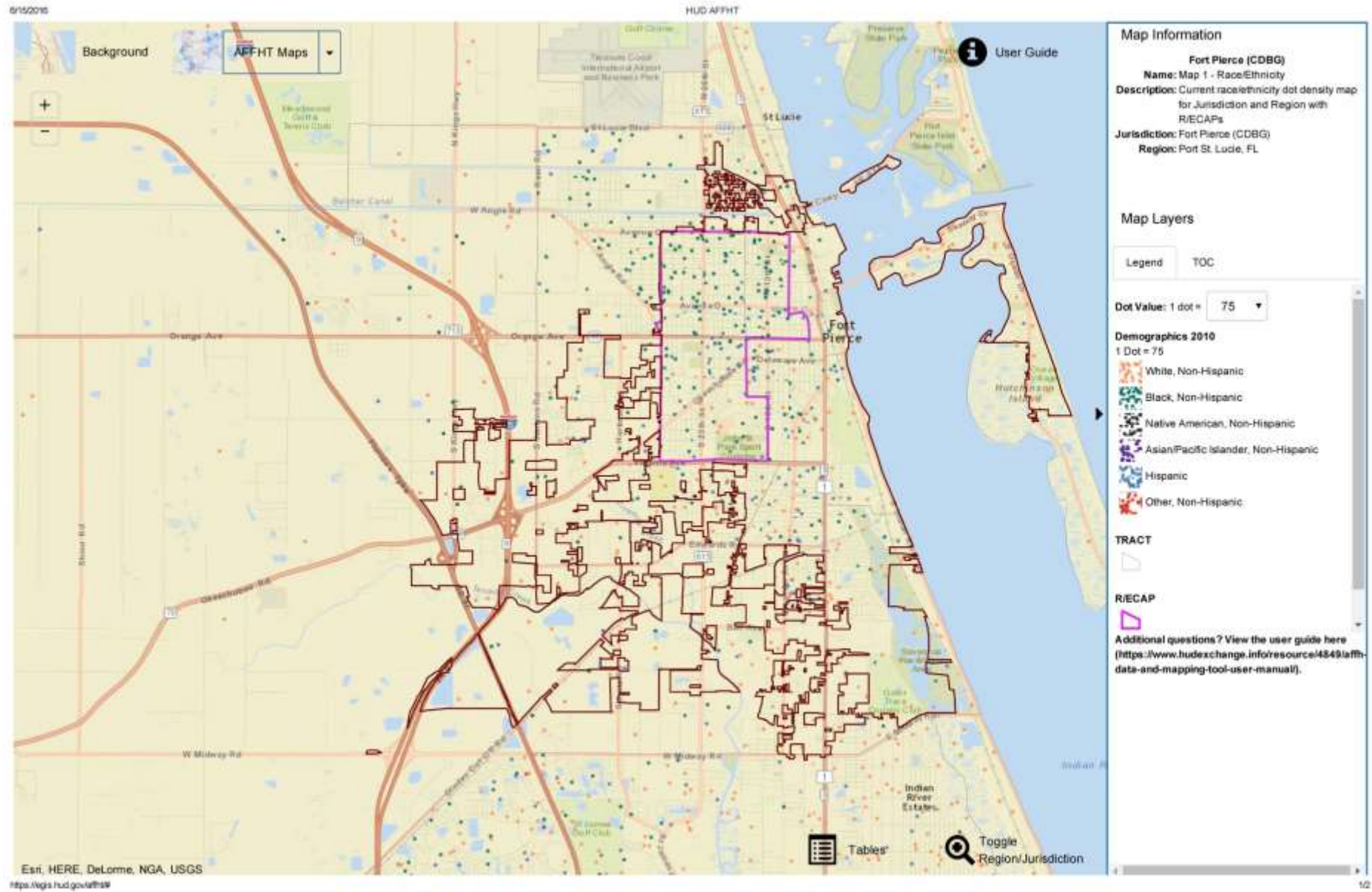
**Map 14 Demographics and Poverty** – Low poverty thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

**Map 15 Demographics and Environmental Health** – Environmental health thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps with R/ECAPs

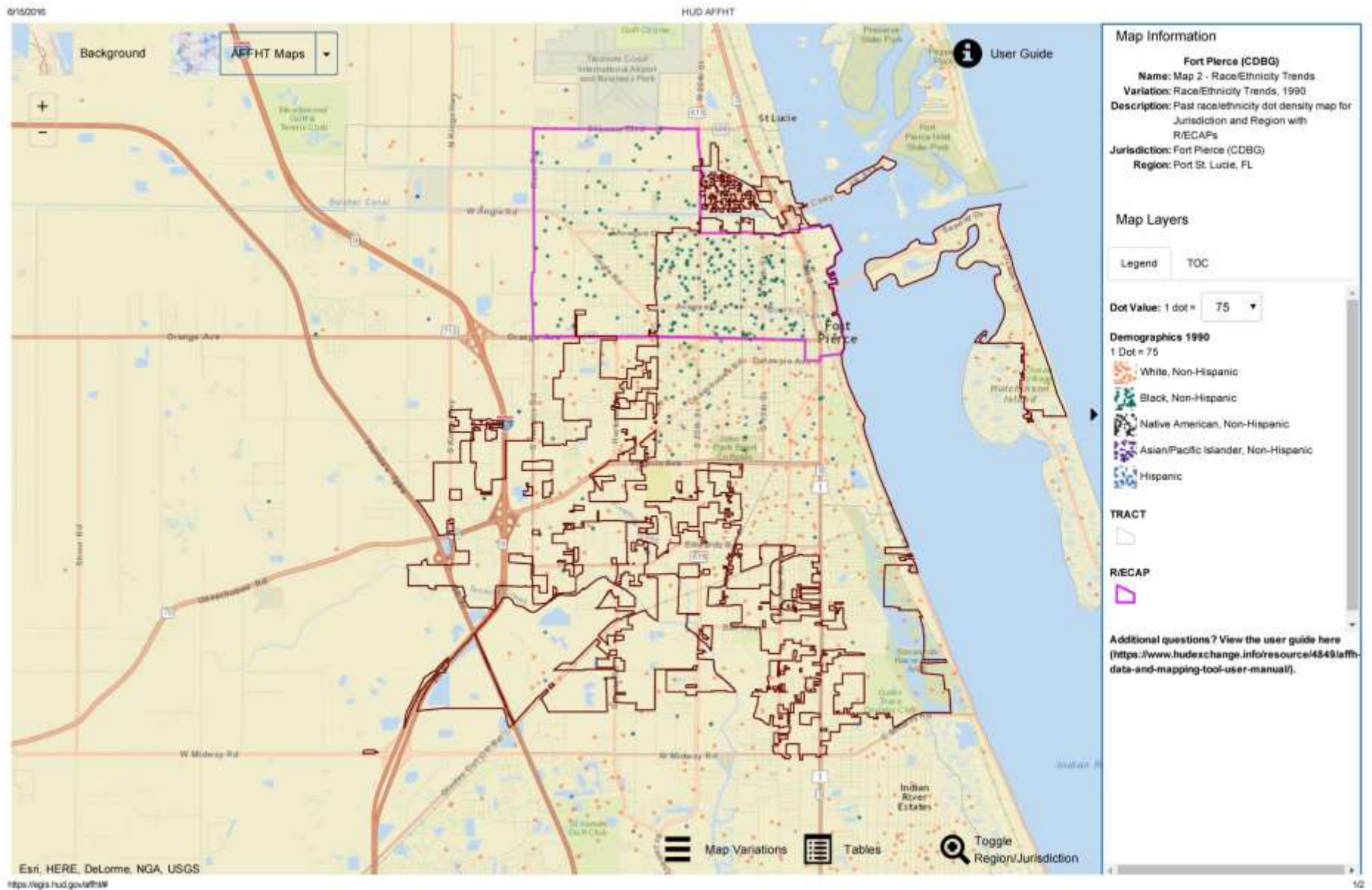
**Map 16 Disability by Type** – Population of persons with disabilities dot density map by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

**Map 17 Disability by Age Group** – All persons with disabilities by age range (5-17; 18- 64; and 65+) dot density map with R/ECAPs for Jurisdiction and Region

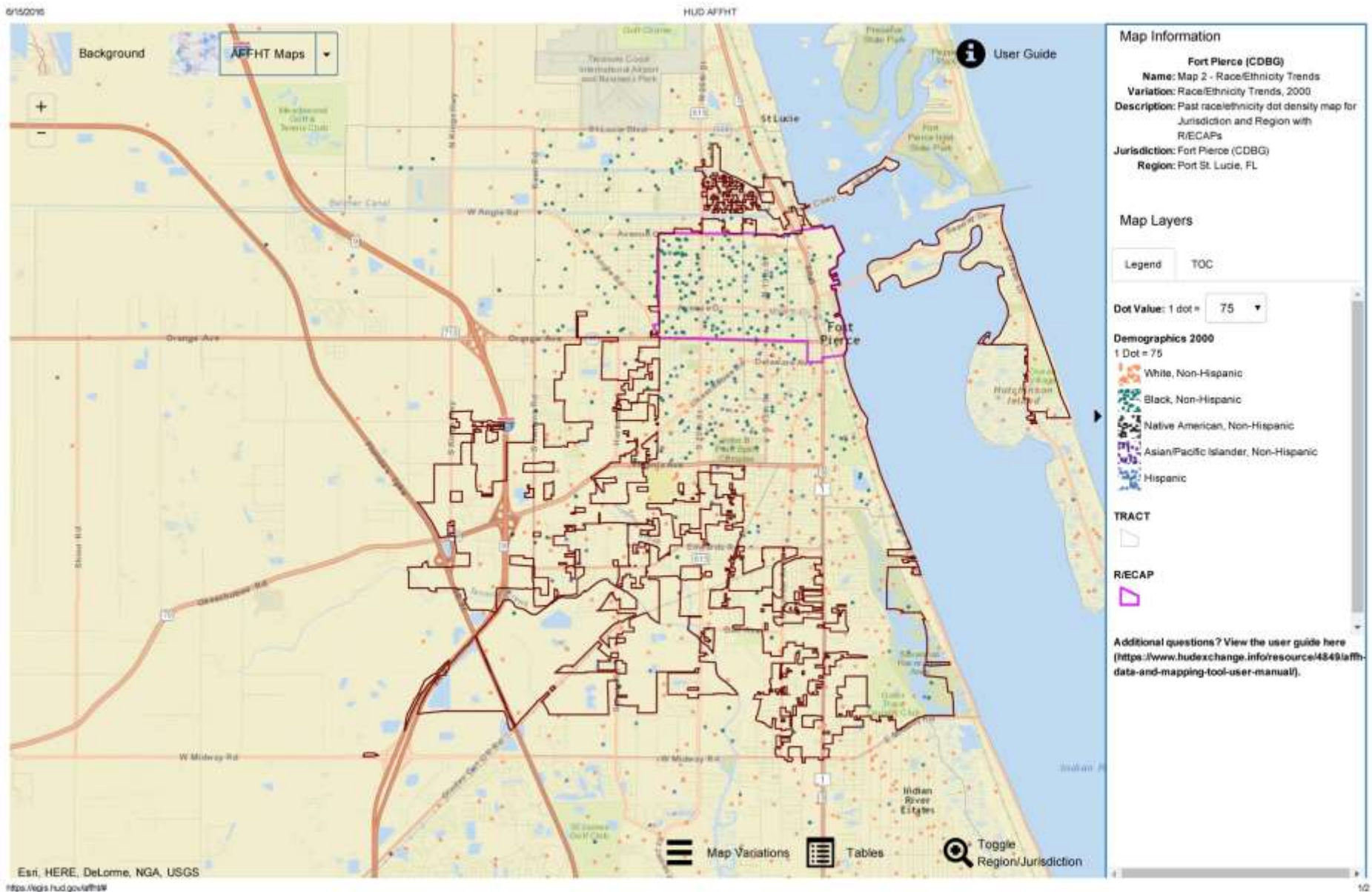
# City of Fort Pierce – Map 1 – Race/Ethnicity



# City of Fort Pierce – Map 2 – Race/Ethnicity Trends - 1990

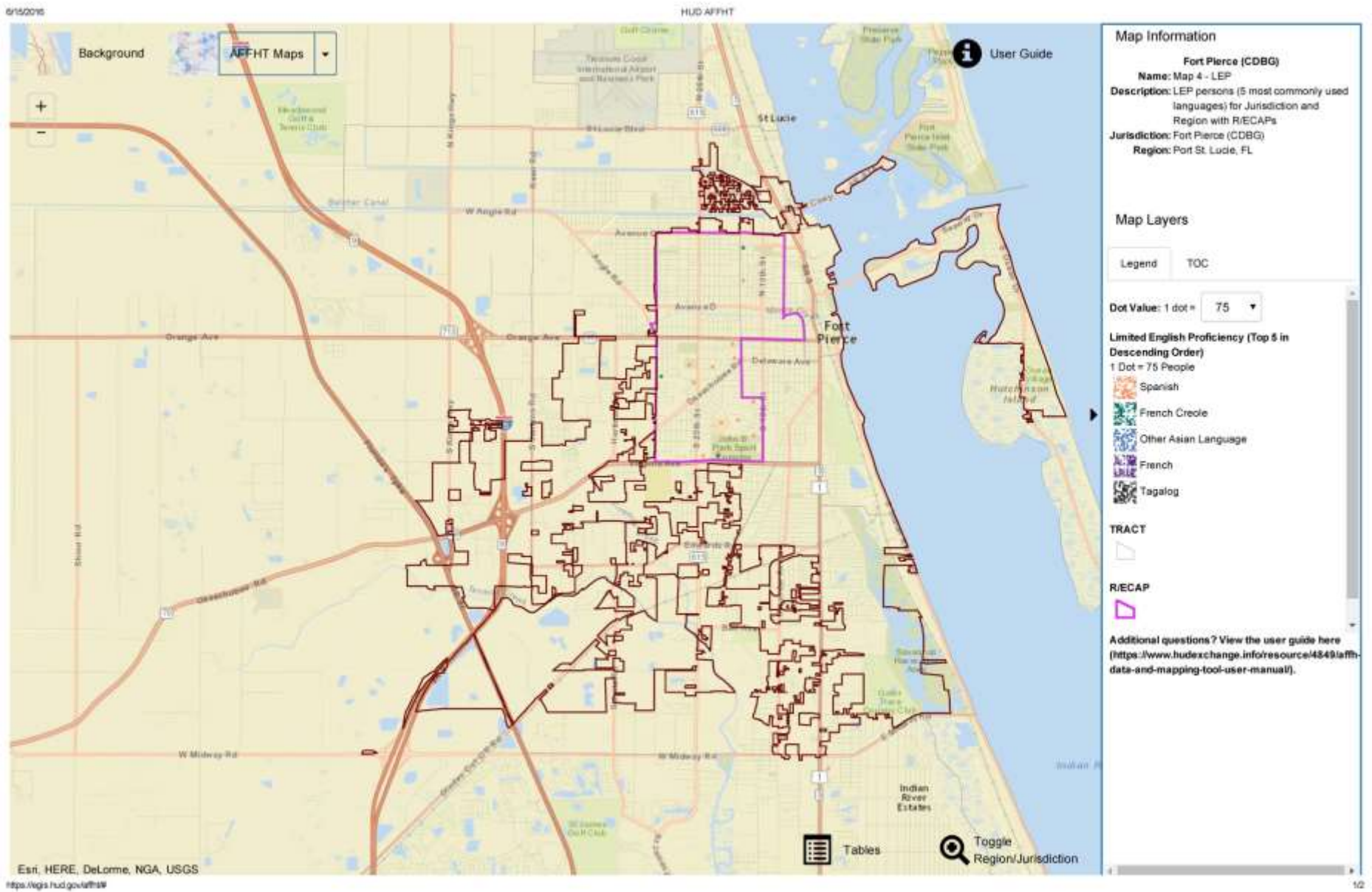


# City of Fort Pierce – Map 2 – Race/Ethnicity Trends - 2010

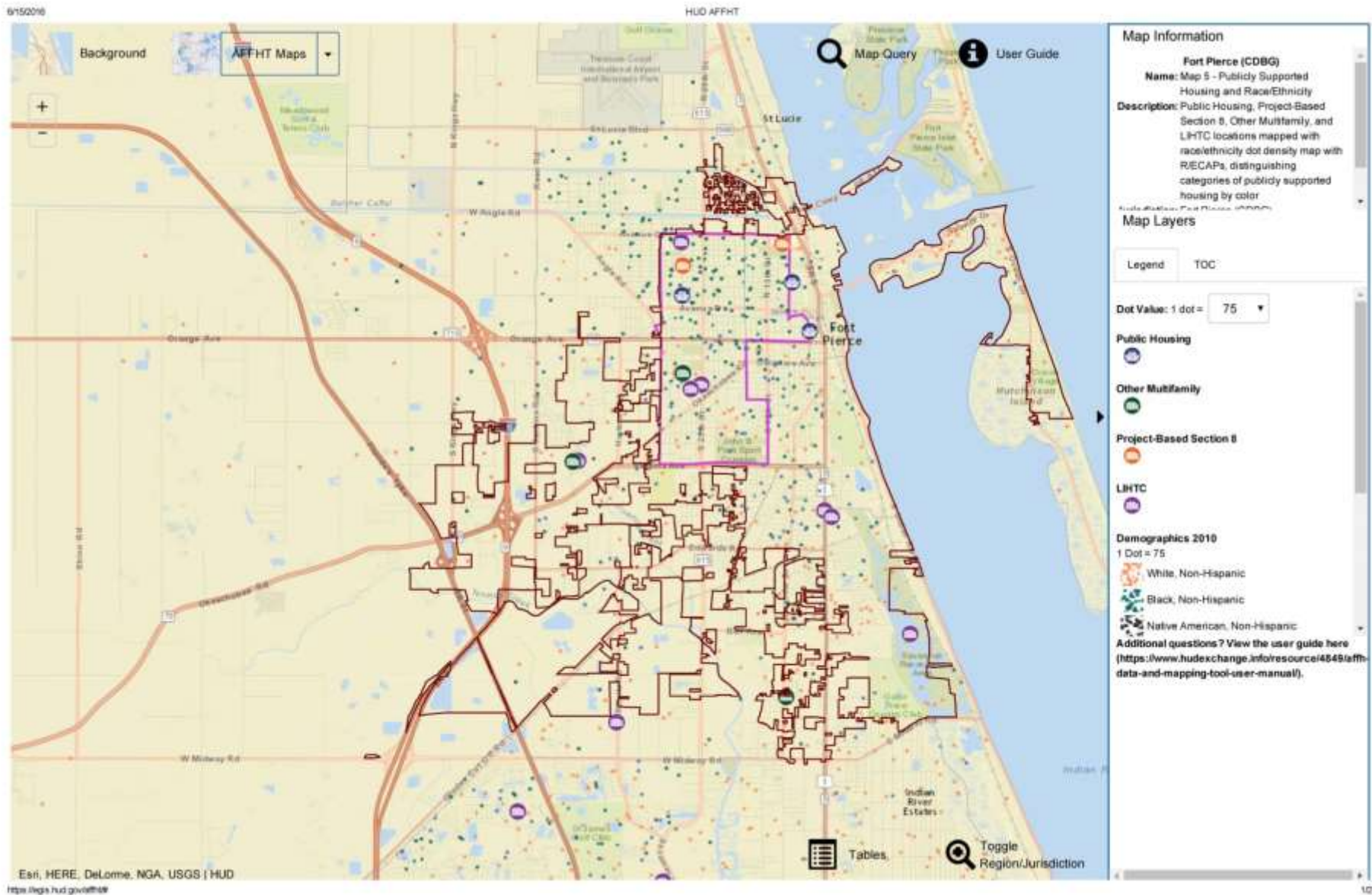




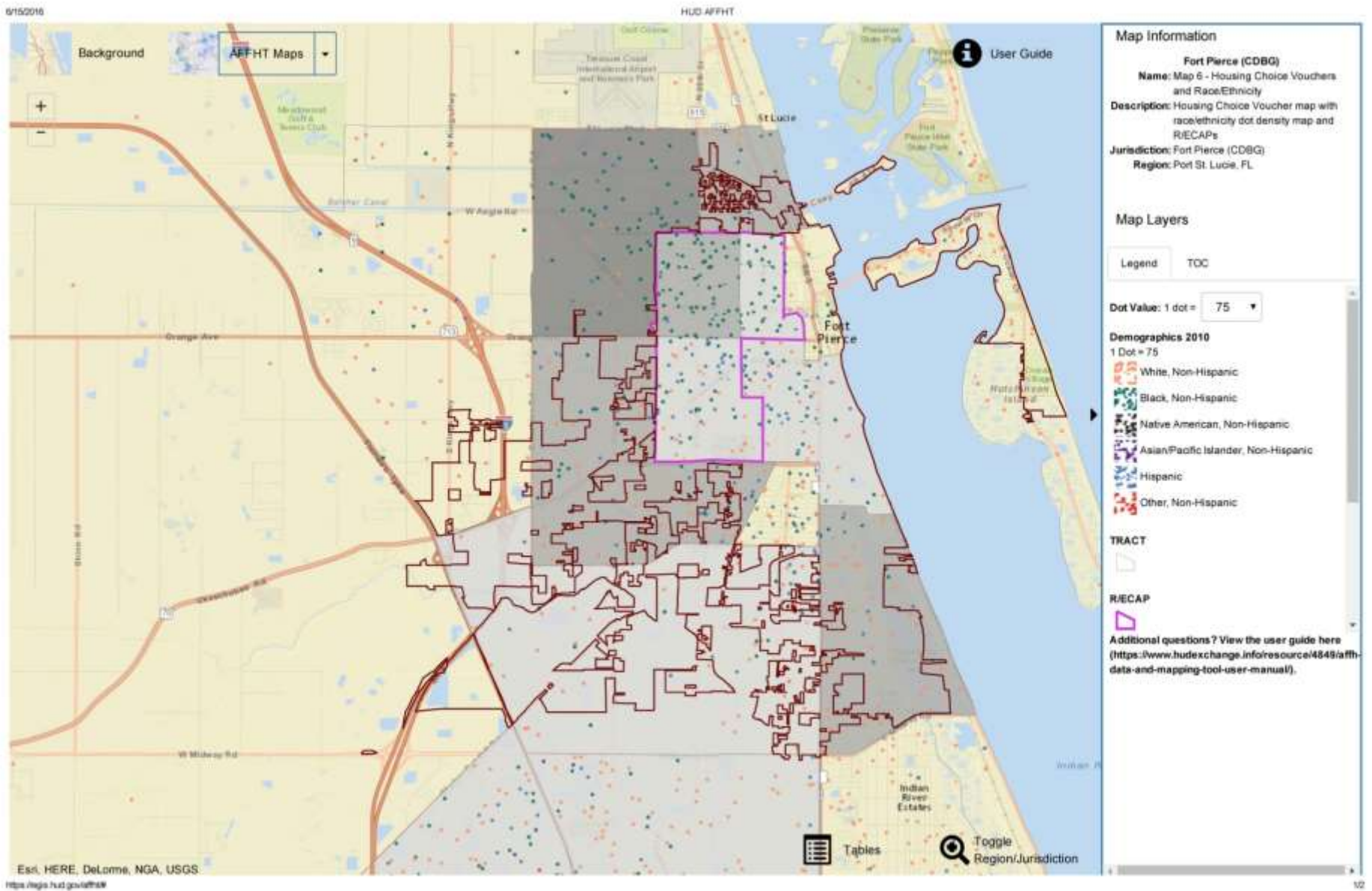
# City of Fort Pierce – Map 4 – LEP – 5 Most Commonly Used Languages



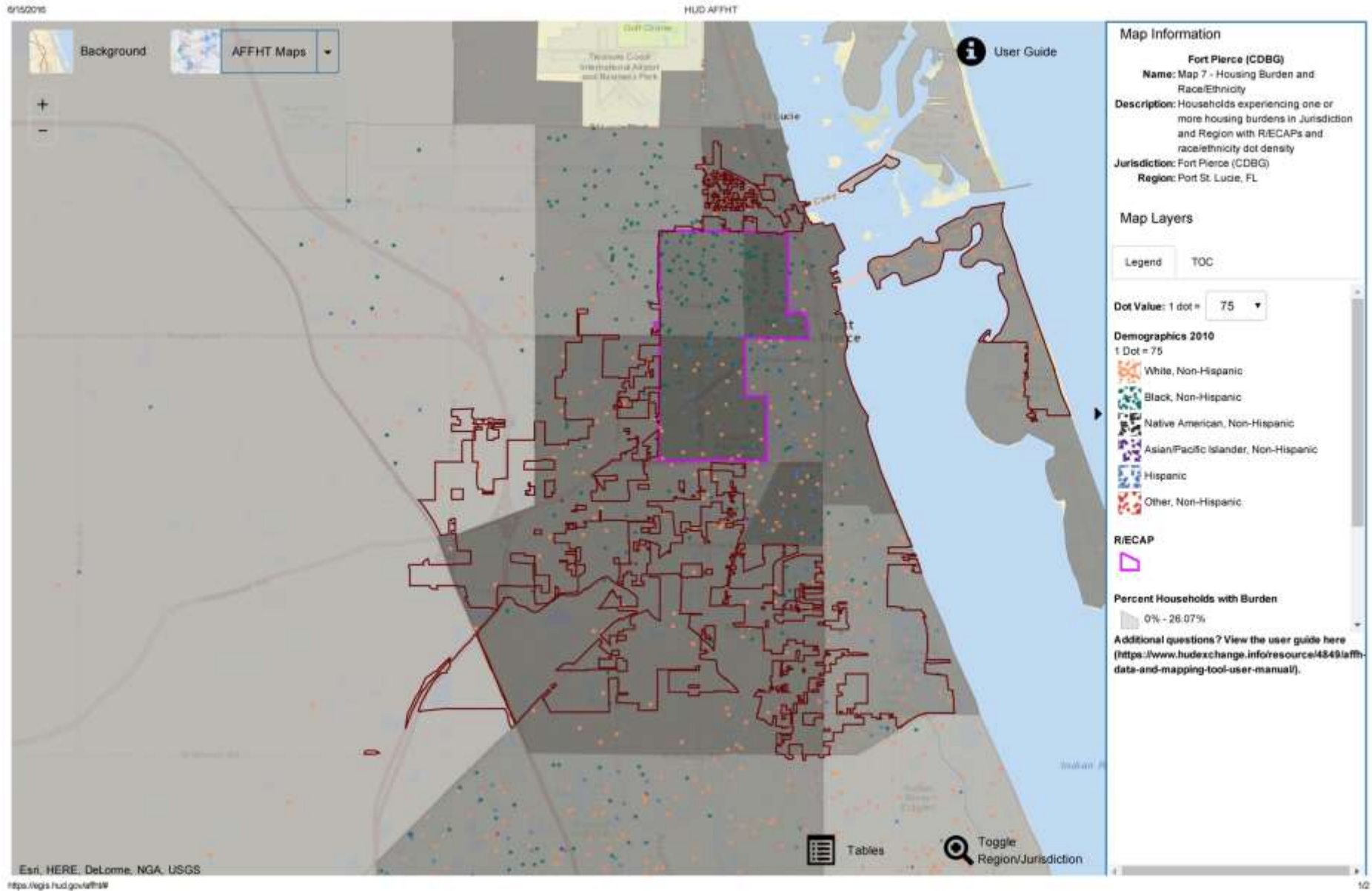
# City of Fort Pierce – Map 5 – Publicly Supported Housing and Race/Ethnicity



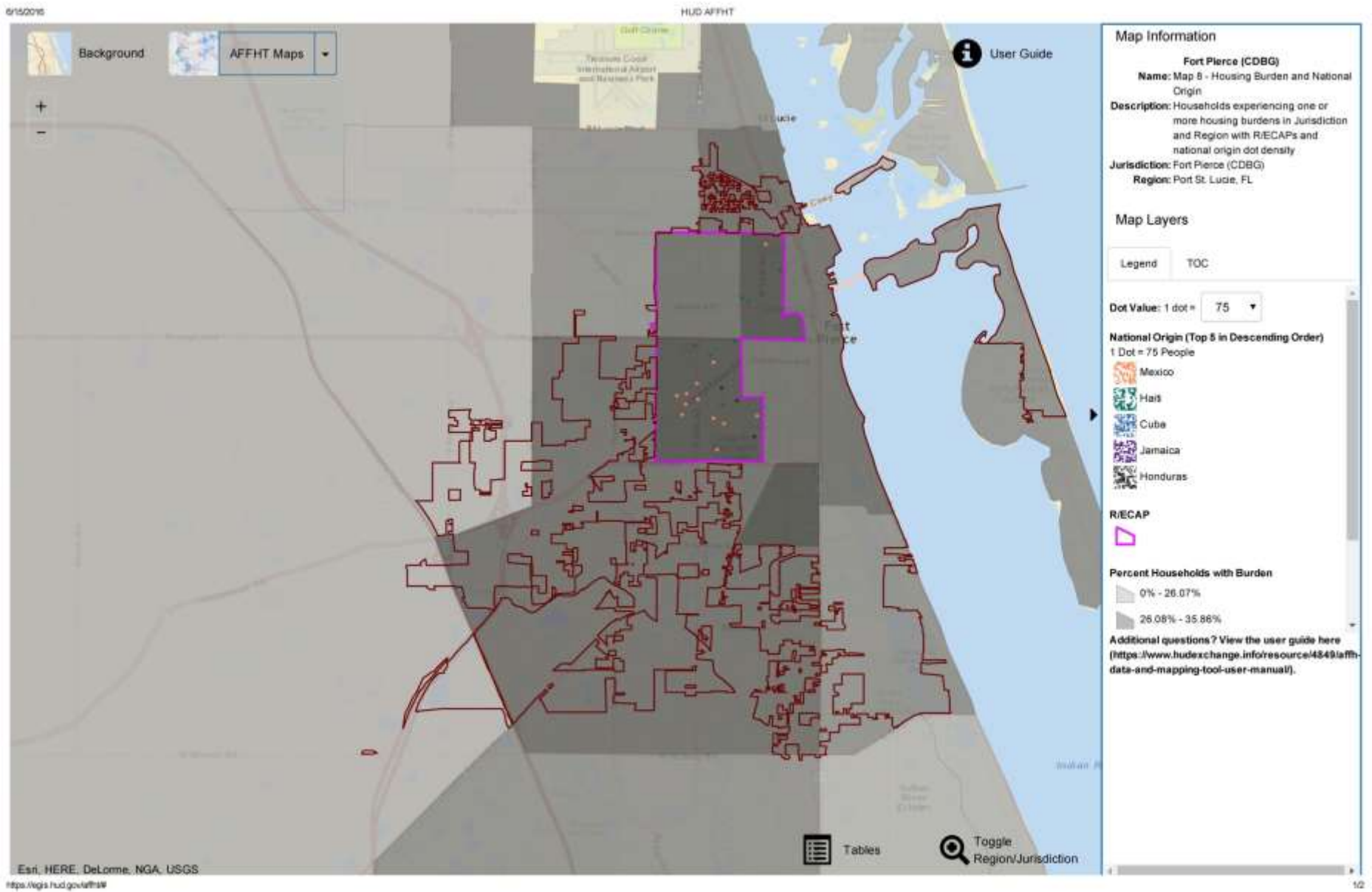
# City of Fort Pierce – Map 6 – Housing Choice Vouchers and Race/Ethnicity



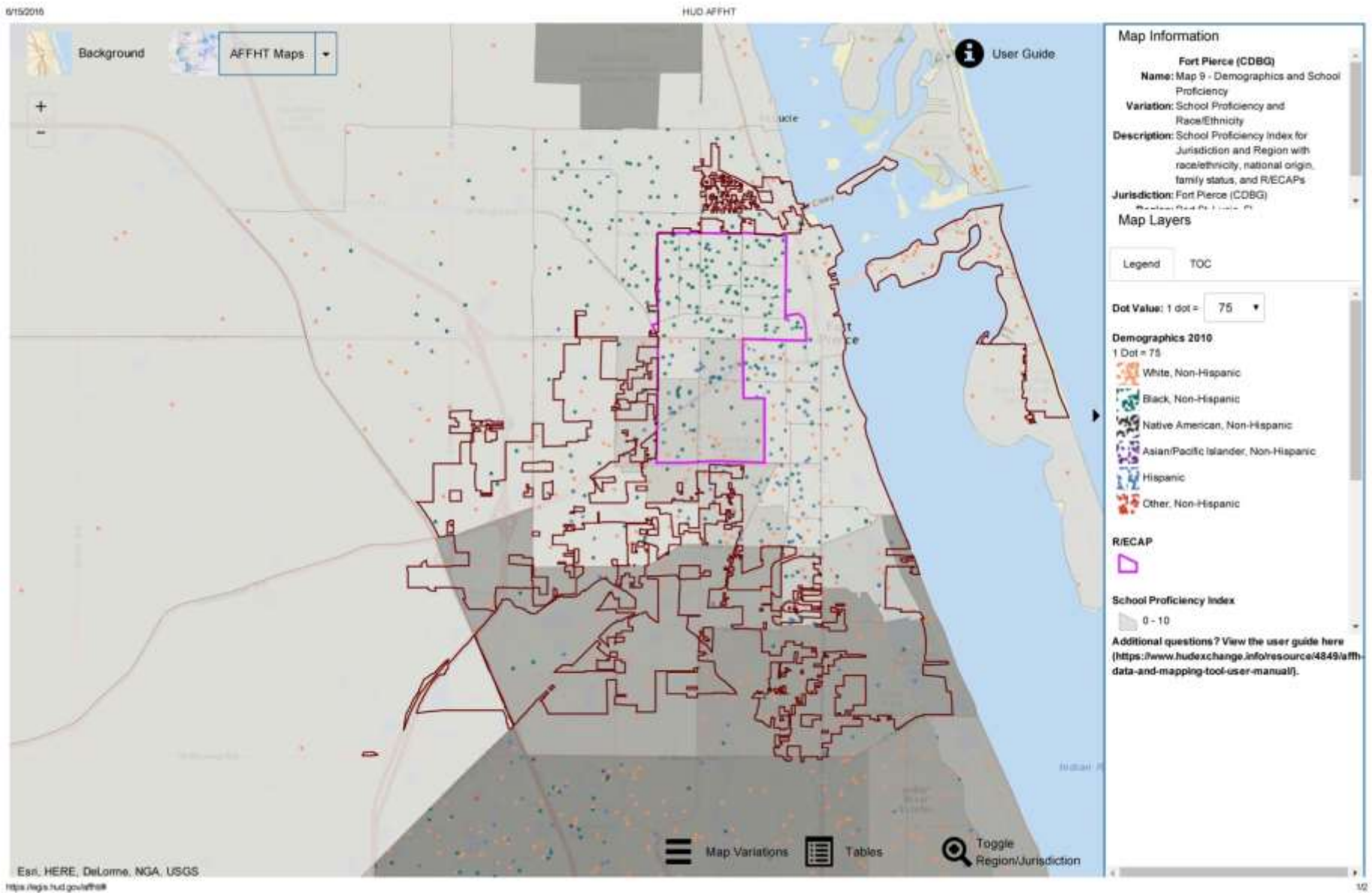
# City of Fort Pierce – Map 7 – Housing Burden with Race/Ethnicity



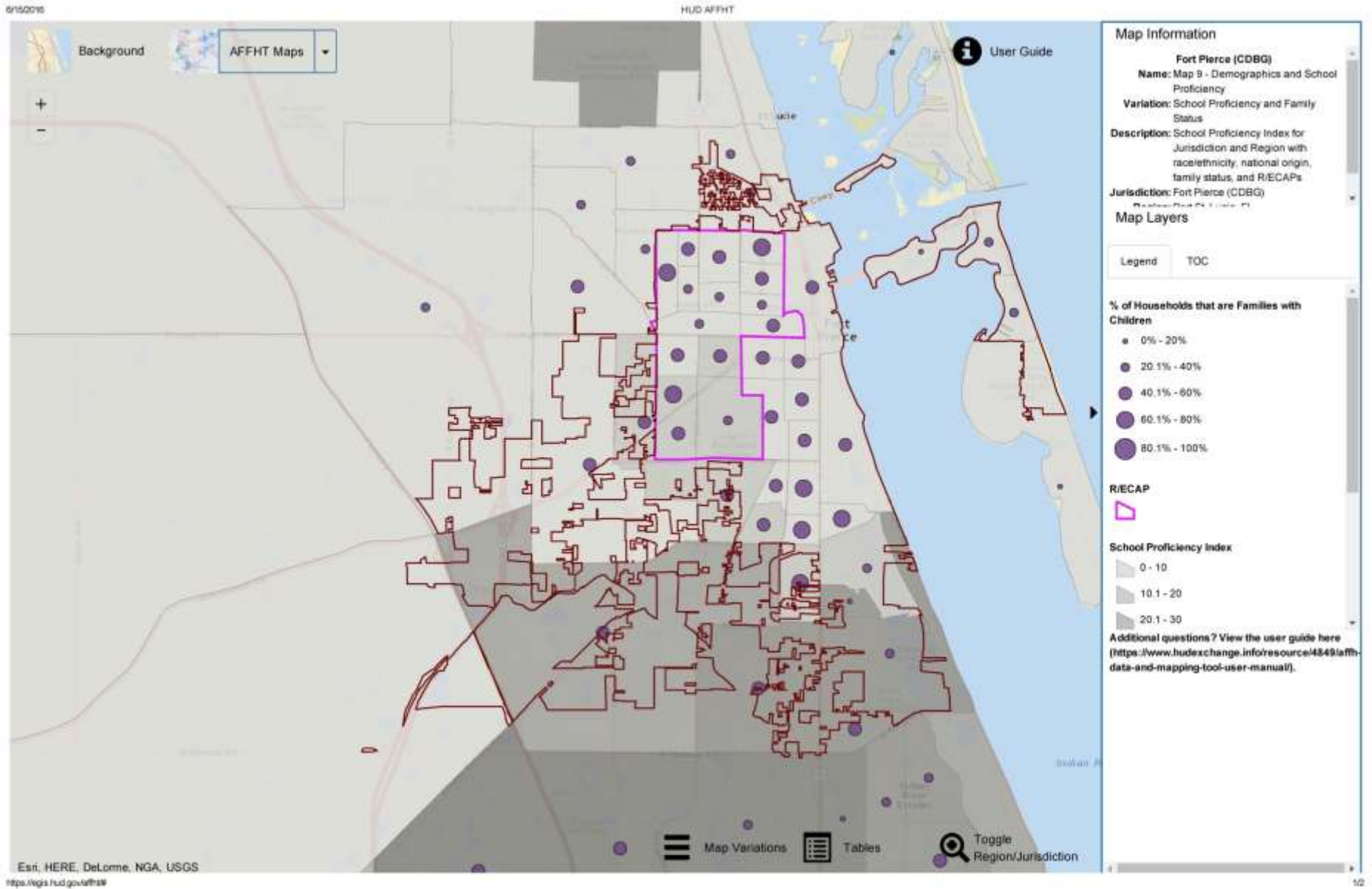
# City of Fort Pierce – Map 8 – Housing Burden with National Origin



# City of Fort Pierce – Map 9 – School Proficiency and Race/Ethnicity



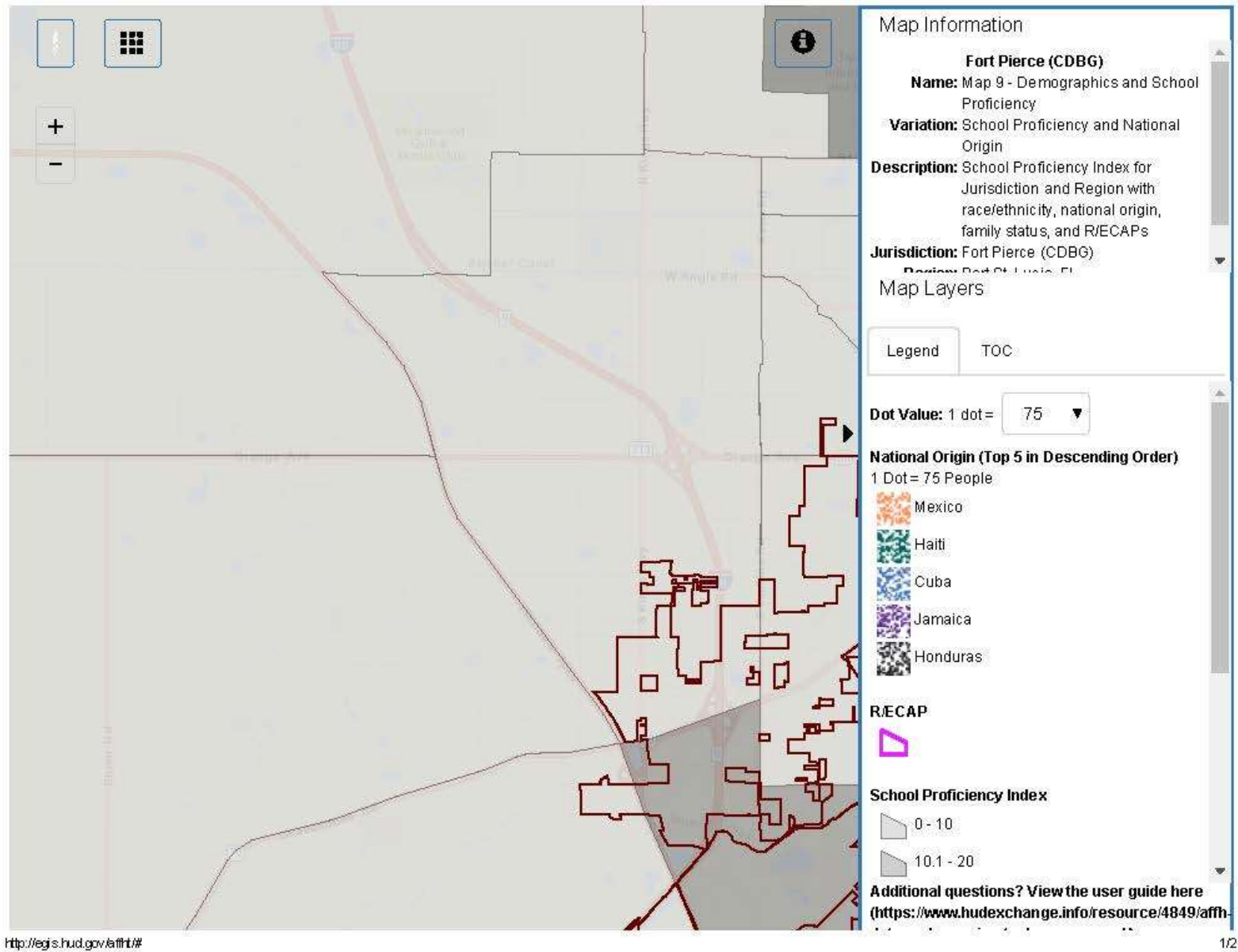
# City of Fort Pierce – Map 9 – School Proficiency and Familial Status



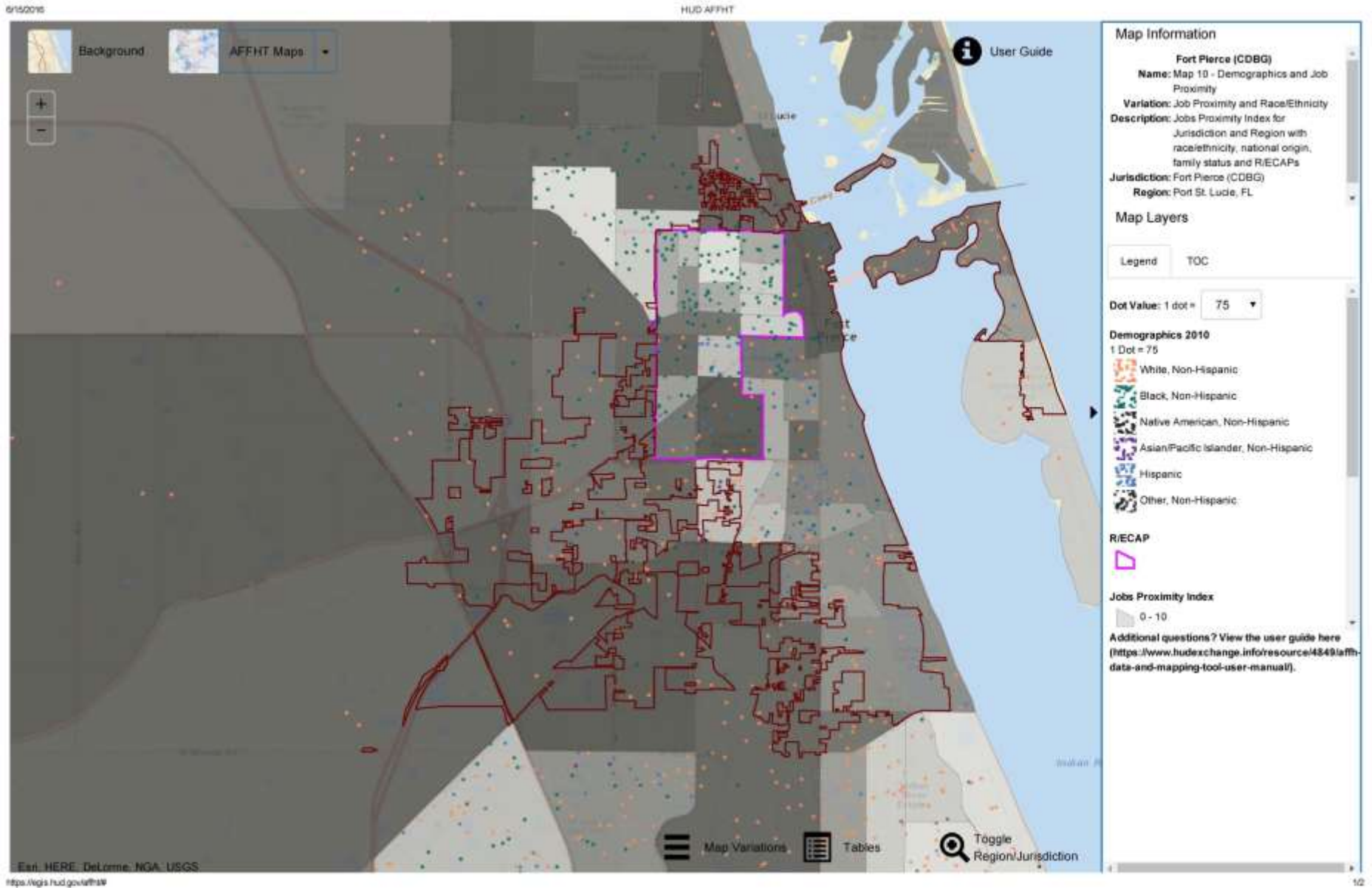
# City of Fort Pierce – Map 9 – School Proficiency and National Origin

6/14/2016

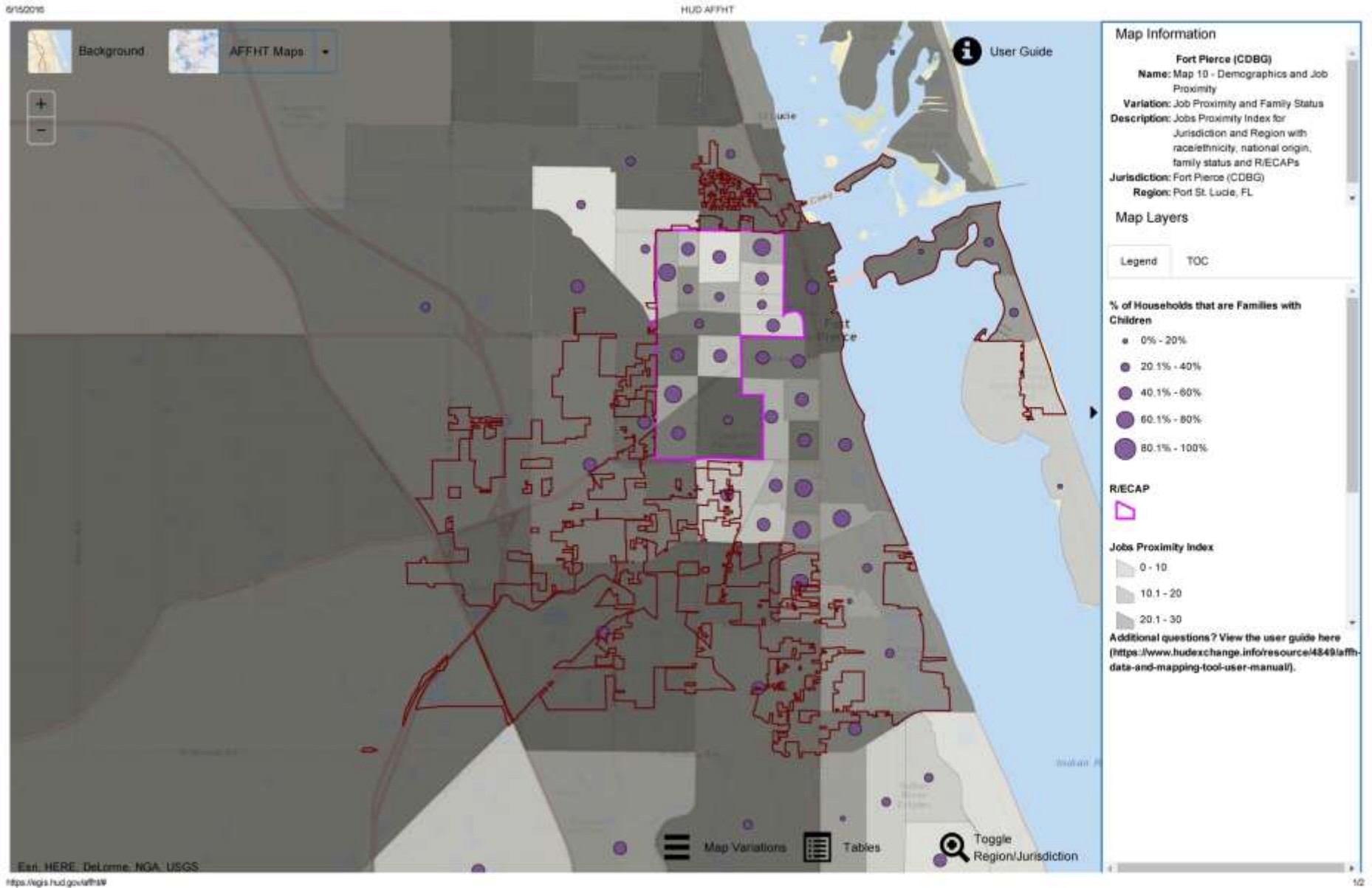
HUD AFFHT



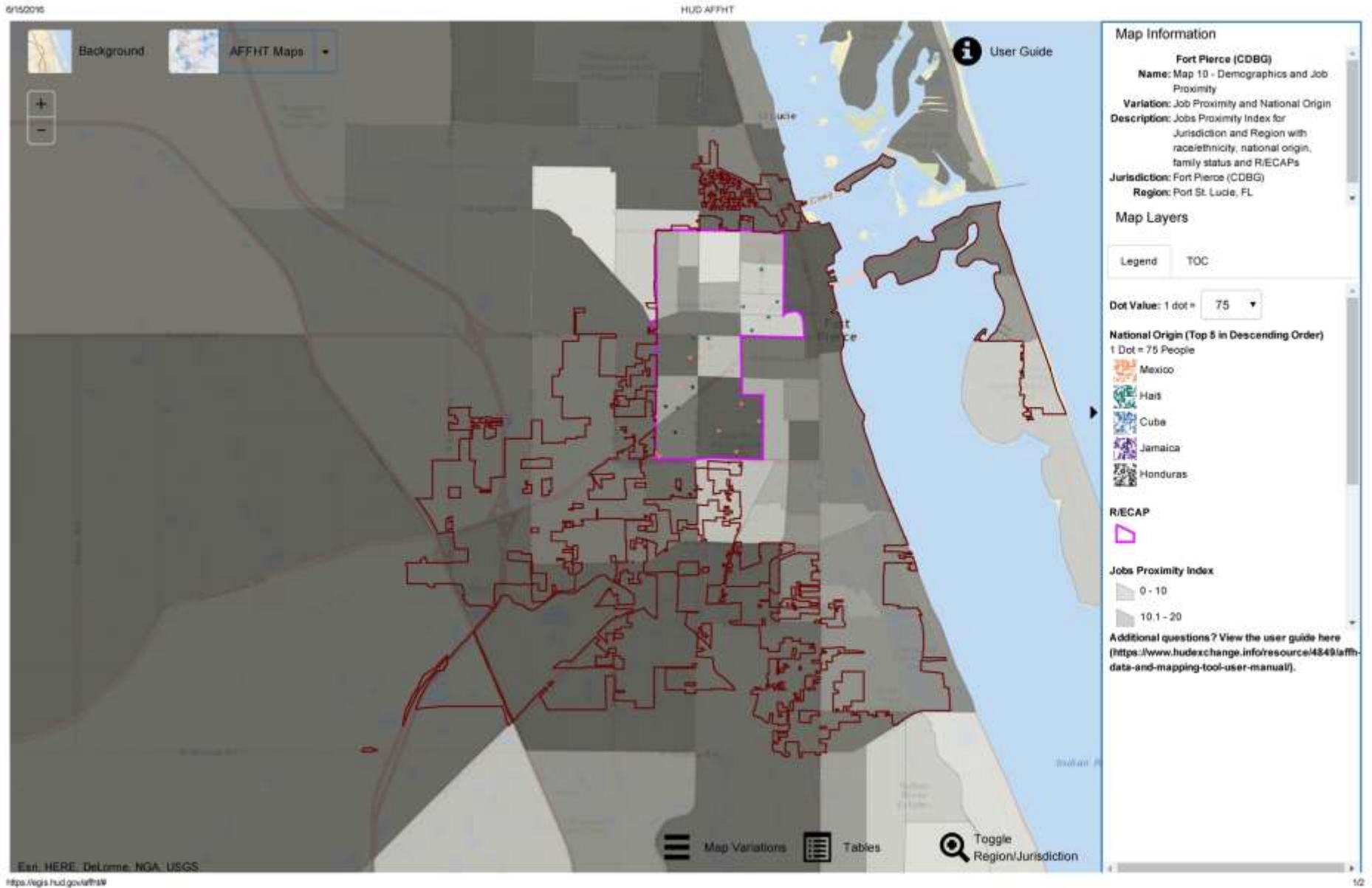
# City of Fort Pierce – Map 10 – Job Proximity and Race/Ethnicity



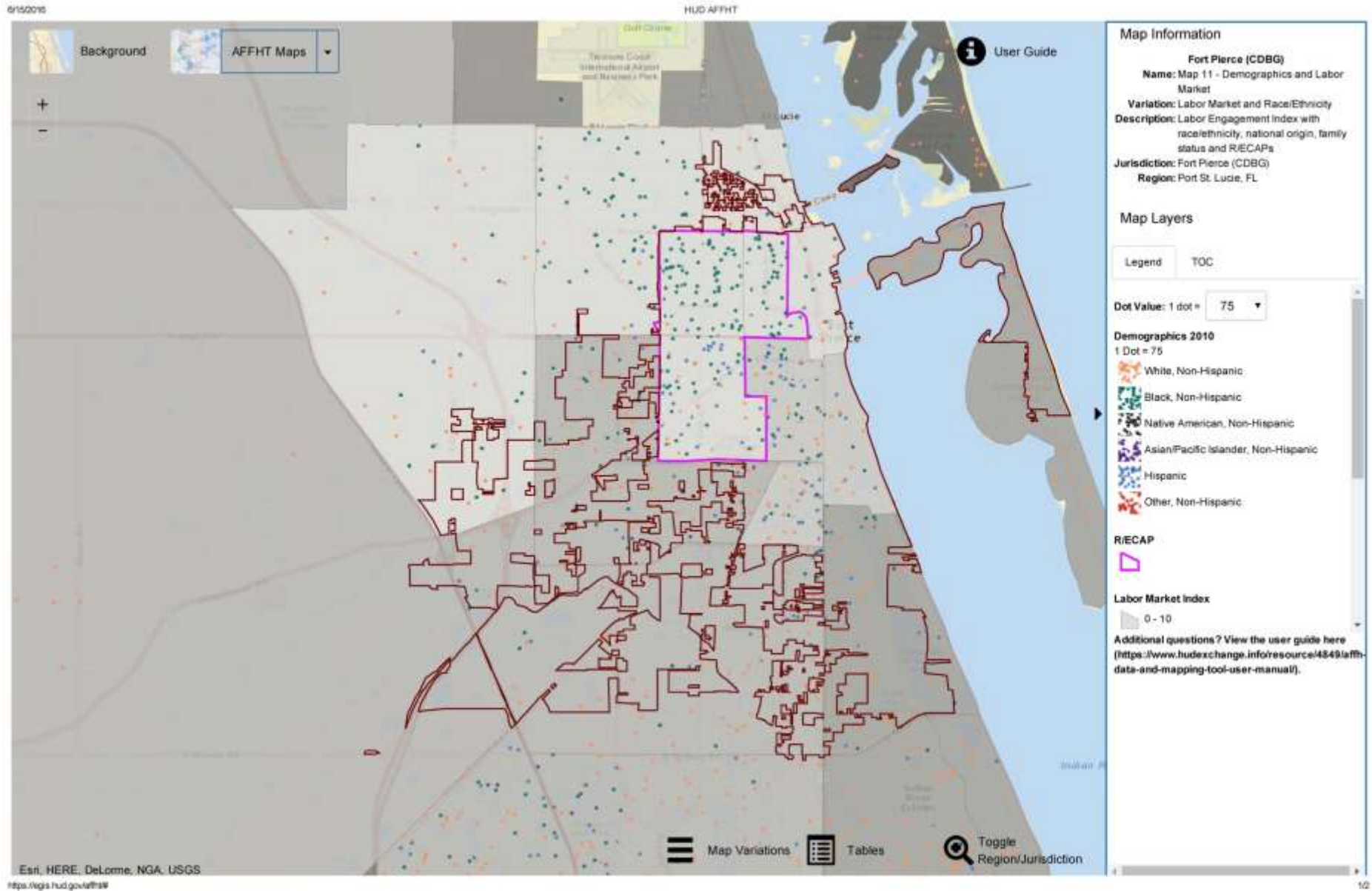
# City of Fort Pierce – Map 10 – Job Proximity and Familial Status



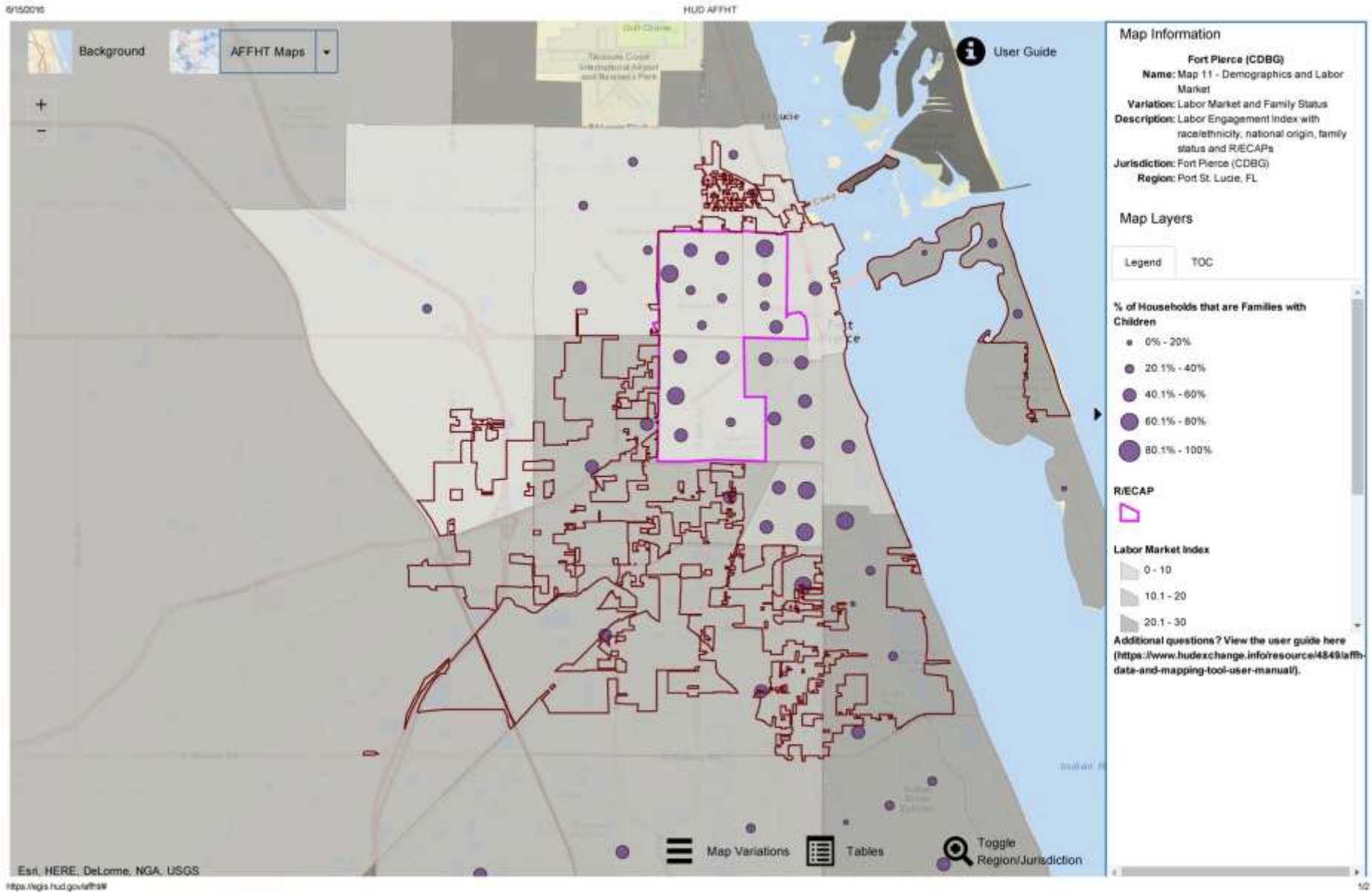
# City of Fort Pierce – Map 10 – Job Proximity and National Origin



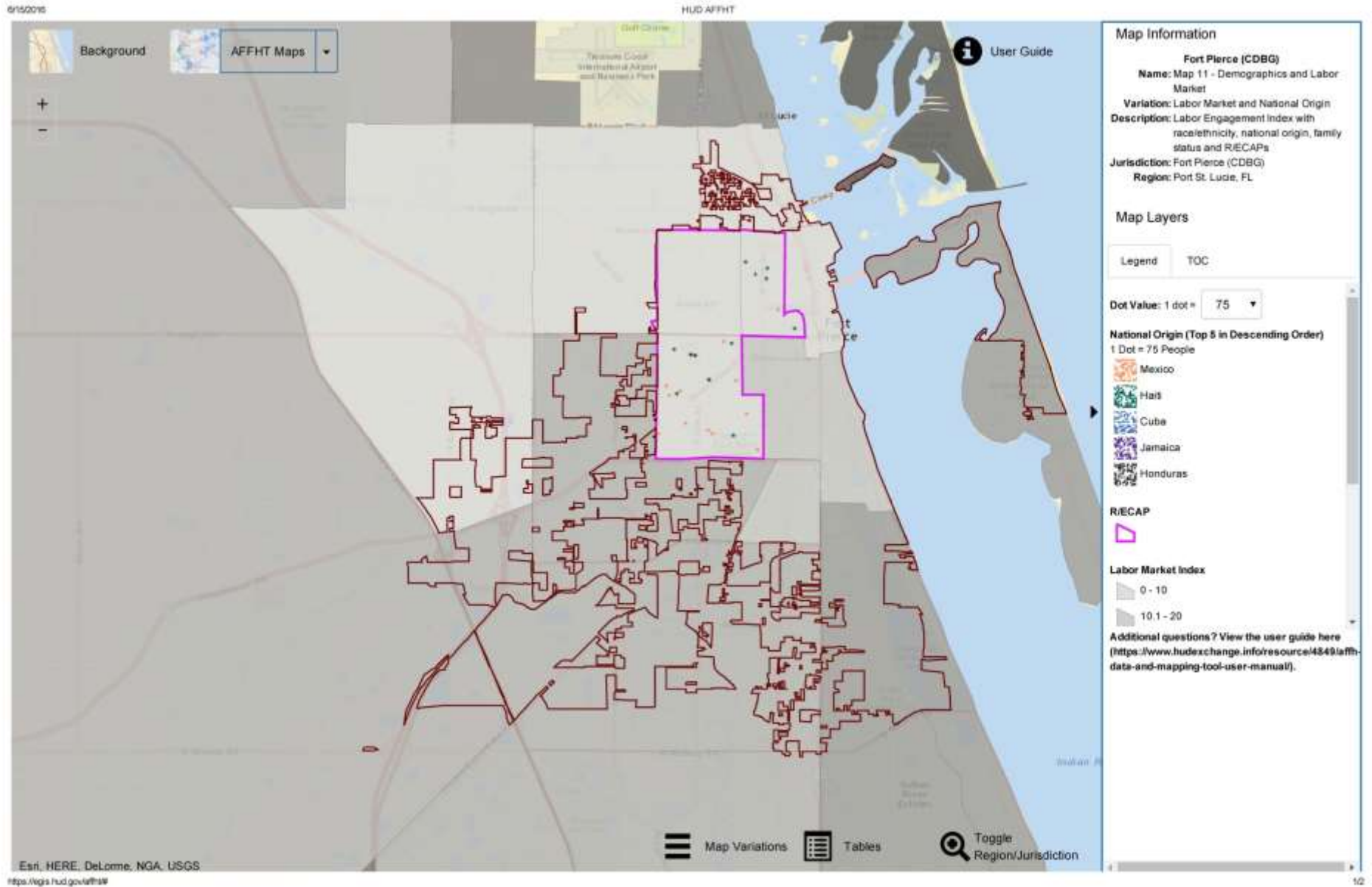
# City of Fort Pierce – Map 11 – Labor Market Engagement and Race/Ethnicity



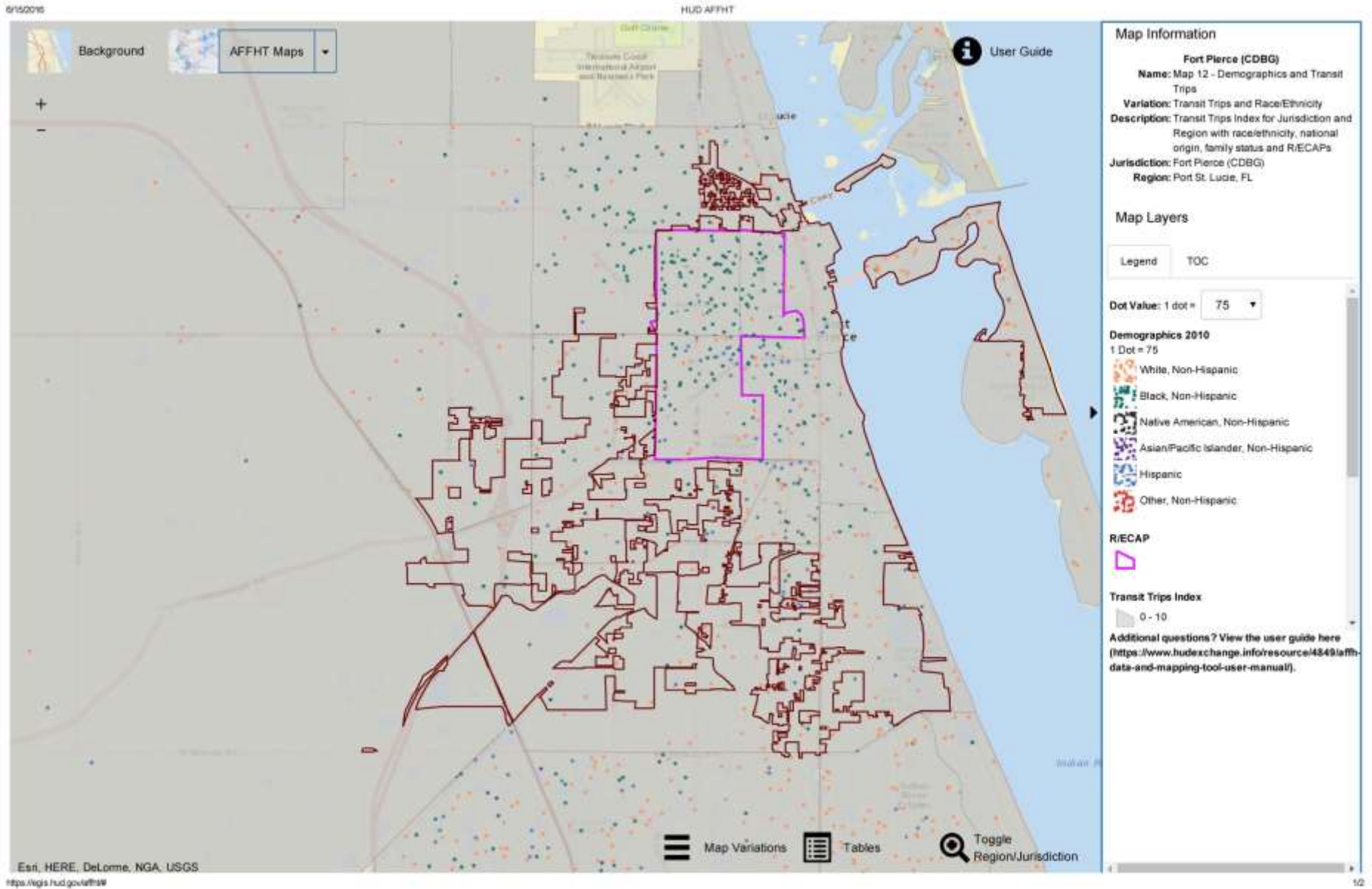
# City of Fort Pierce – Map 11 – Labor Market Engagement and Familial Status



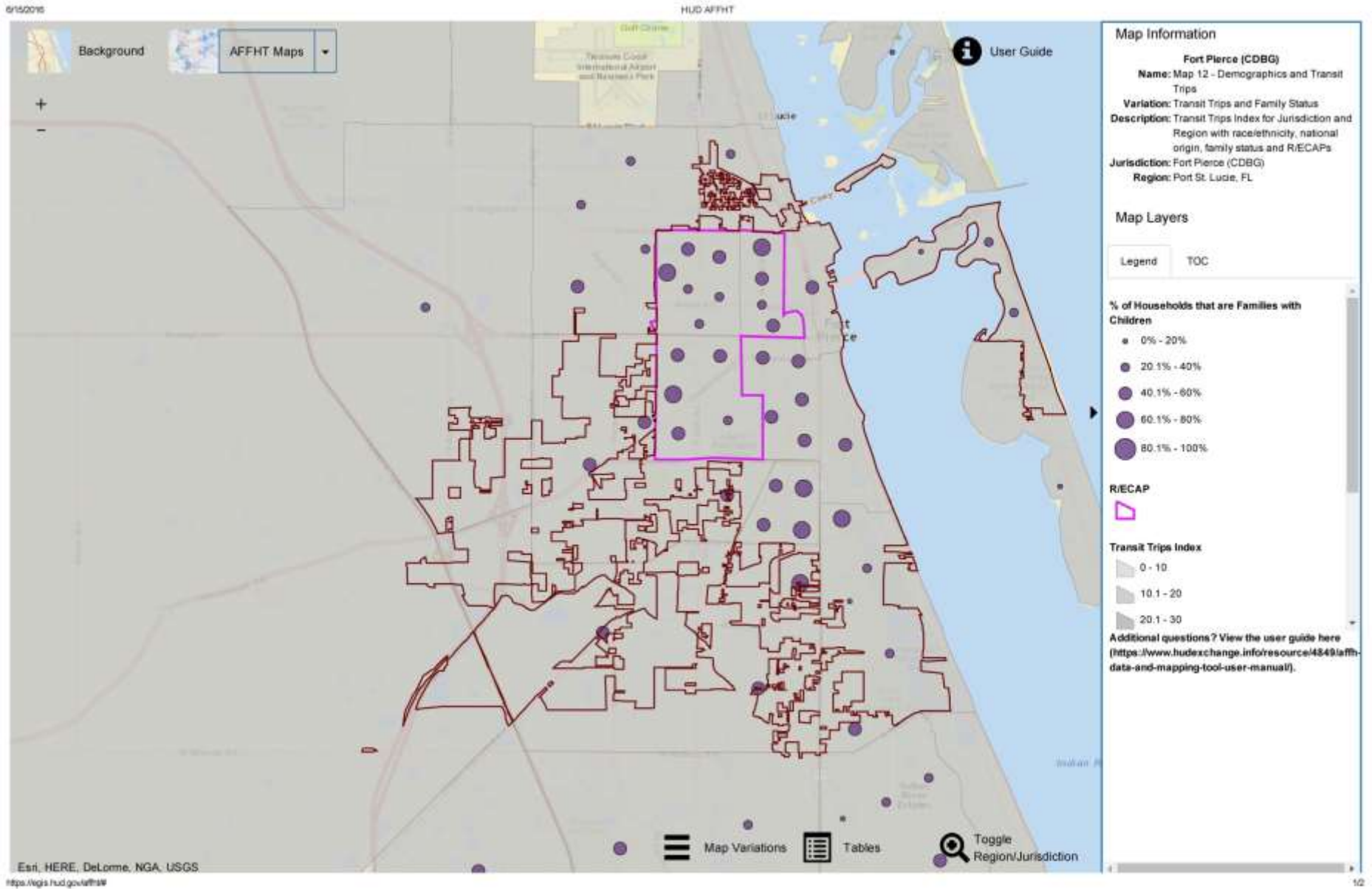
# City of Fort Pierce – Map 11 – Labor Market Engagement and National Origin



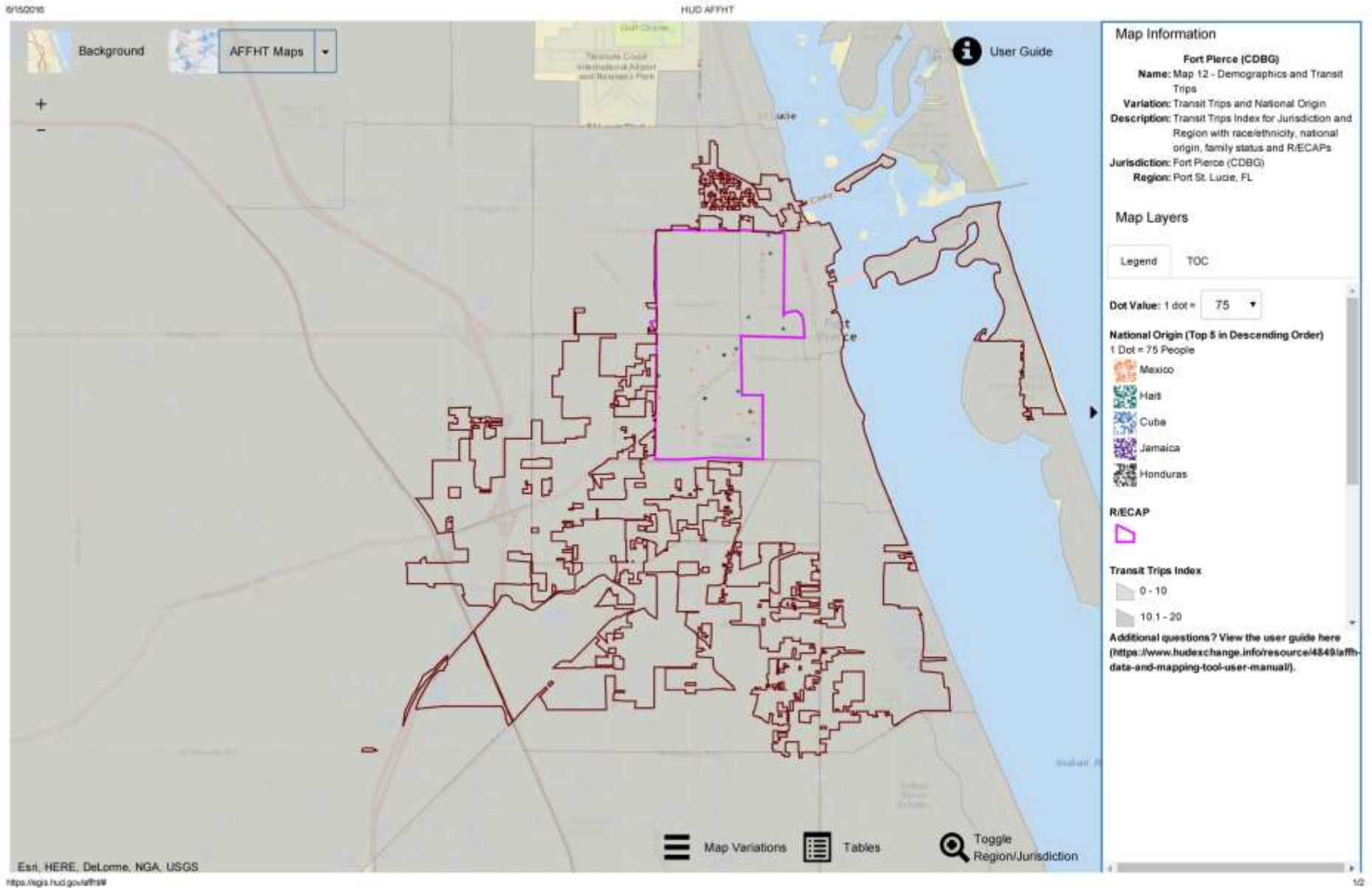
# City of Fort Pierce – Map 12 – Transit Trips and Race/Ethnicity



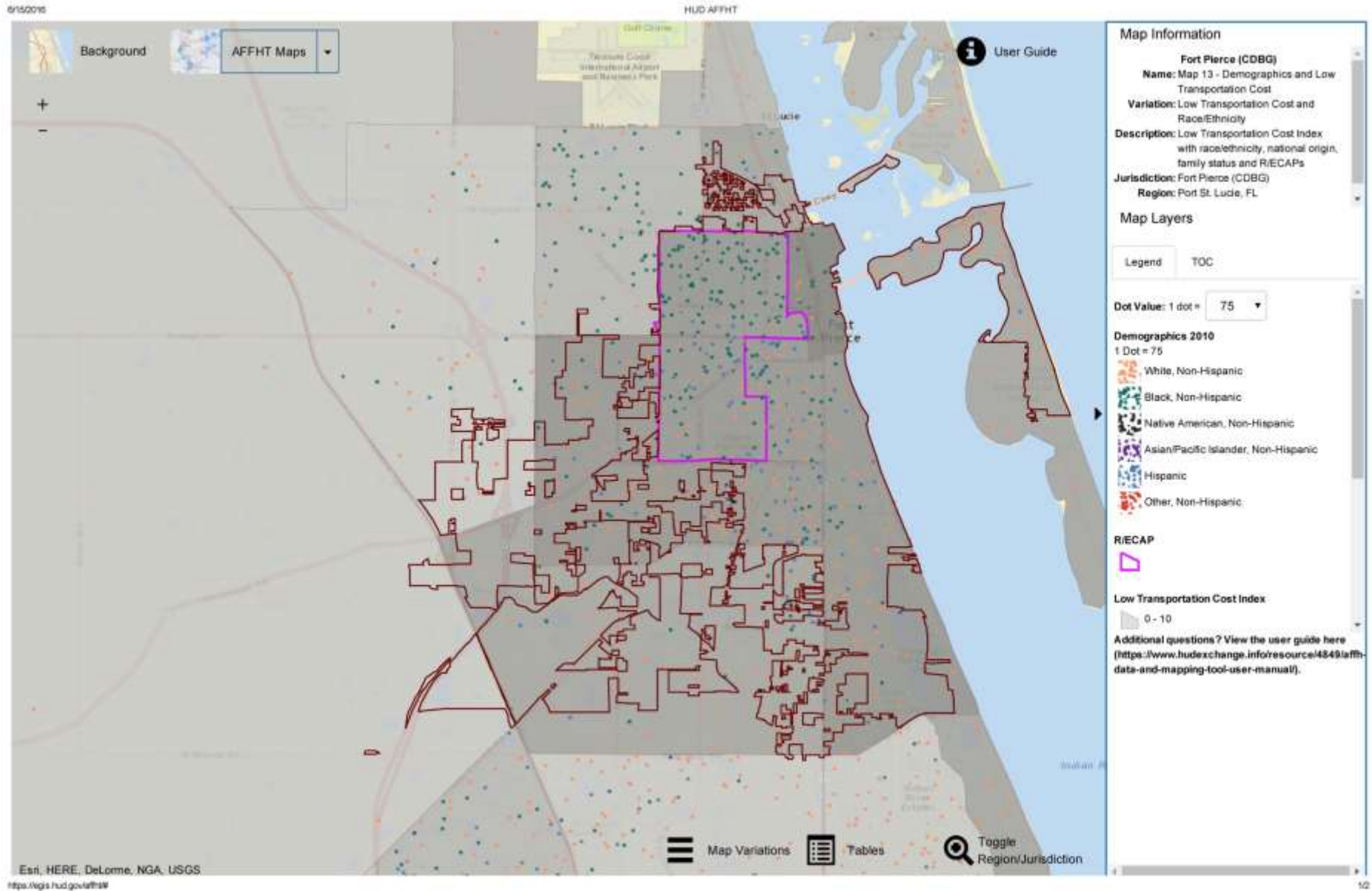
# City of Fort Pierce – Map 12 – Transit Trips and Familial Status



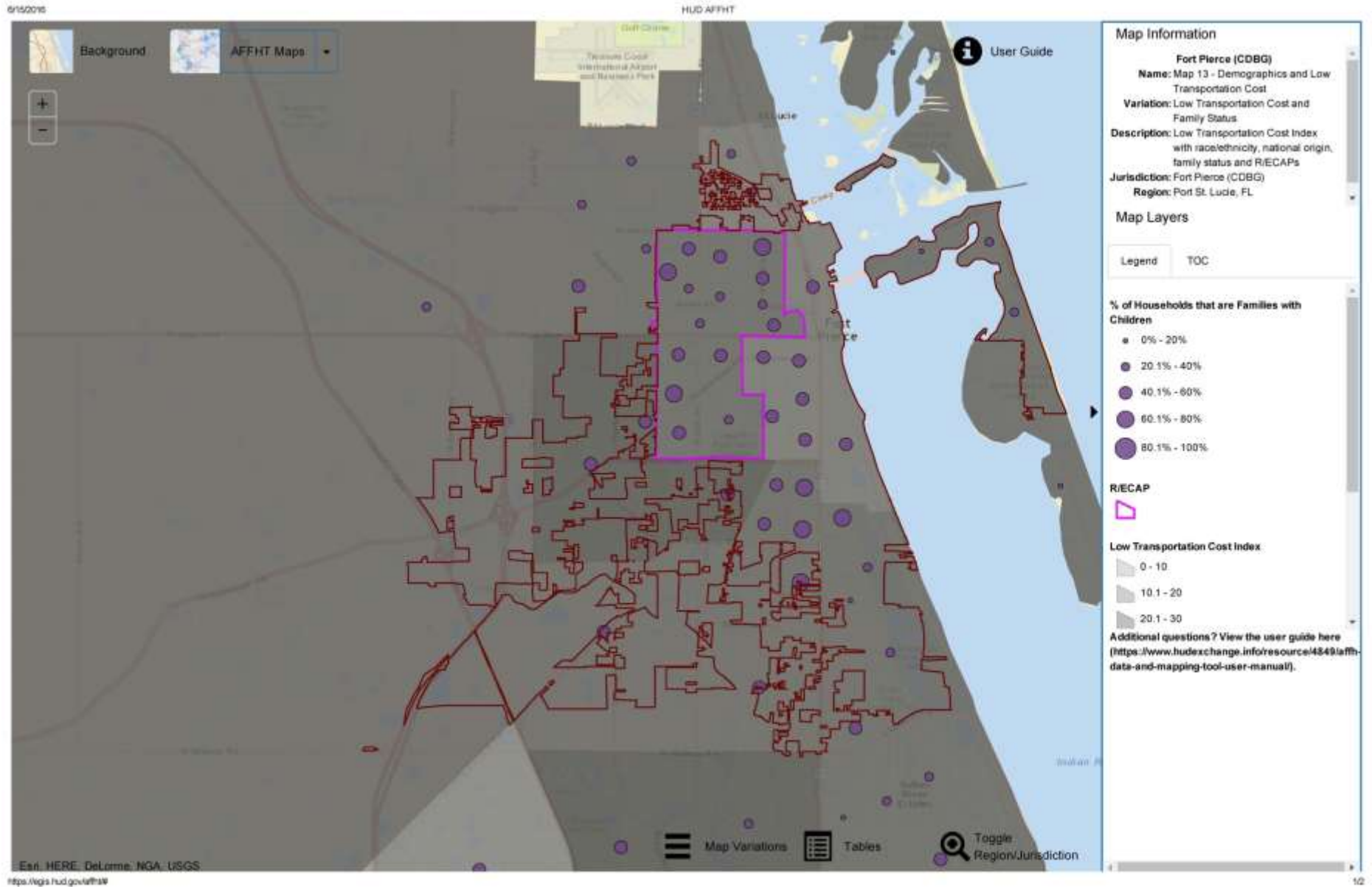
# City of Fort Pierce – Map 12 – Transit Trips and National Origin



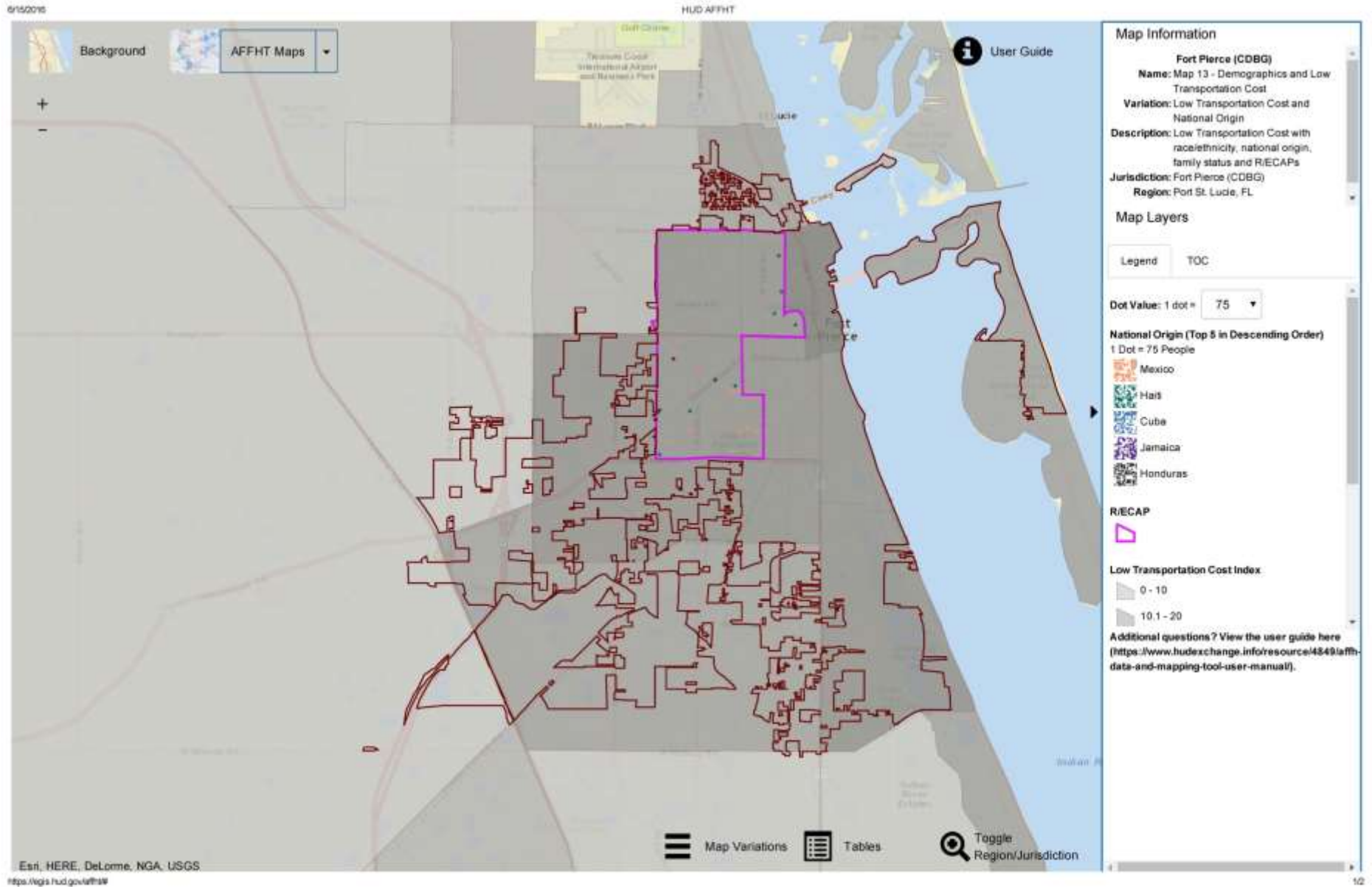
# City of Fort Pierce – Map 13 – Low Transit Costs and Race/Ethnicity



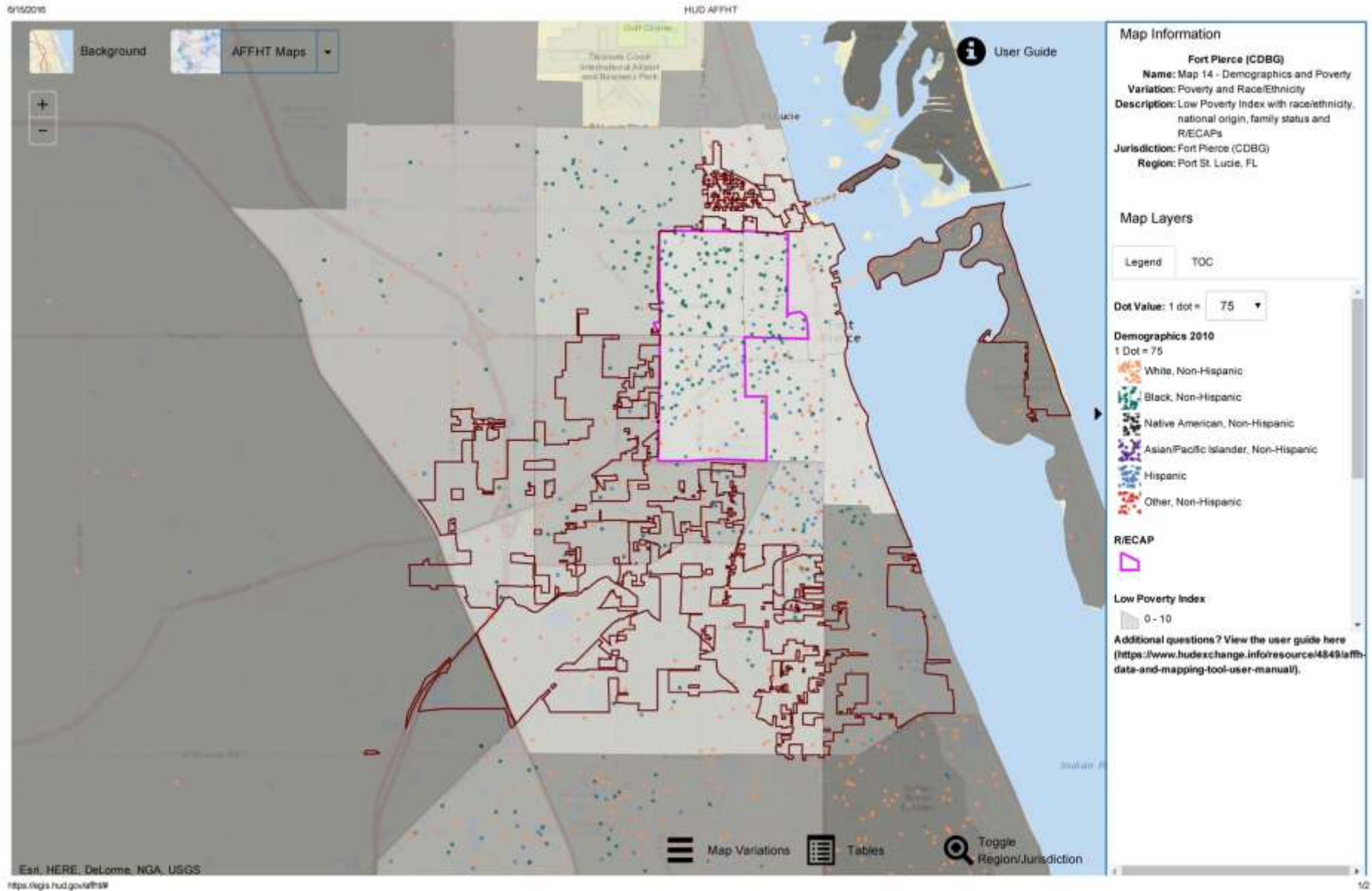
# City of Fort Pierce – Map 13 – Low Transit Costs and Familial Status



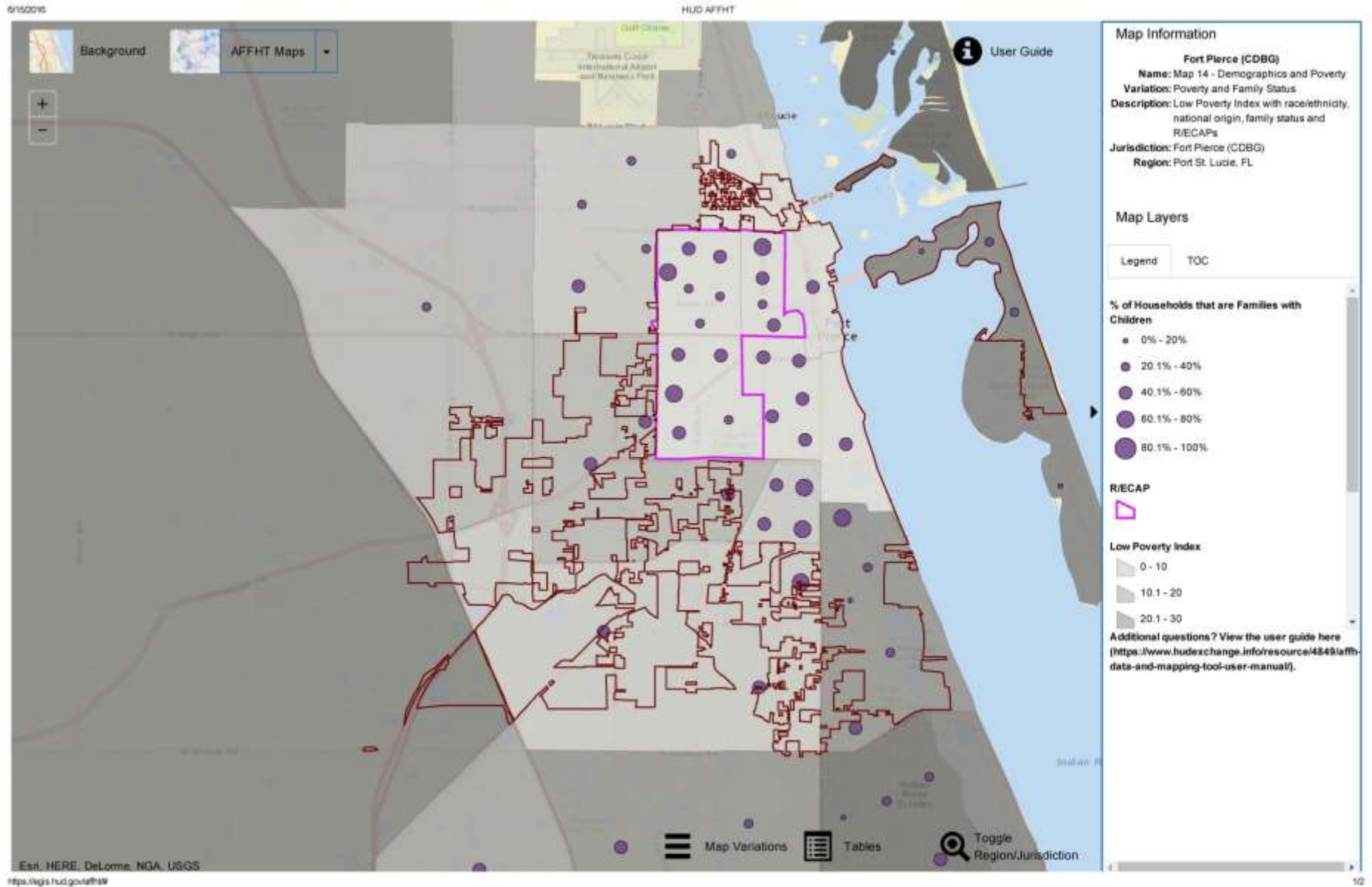
# City of Fort Pierce – Map 13 – Low Transit Costs and National Origin



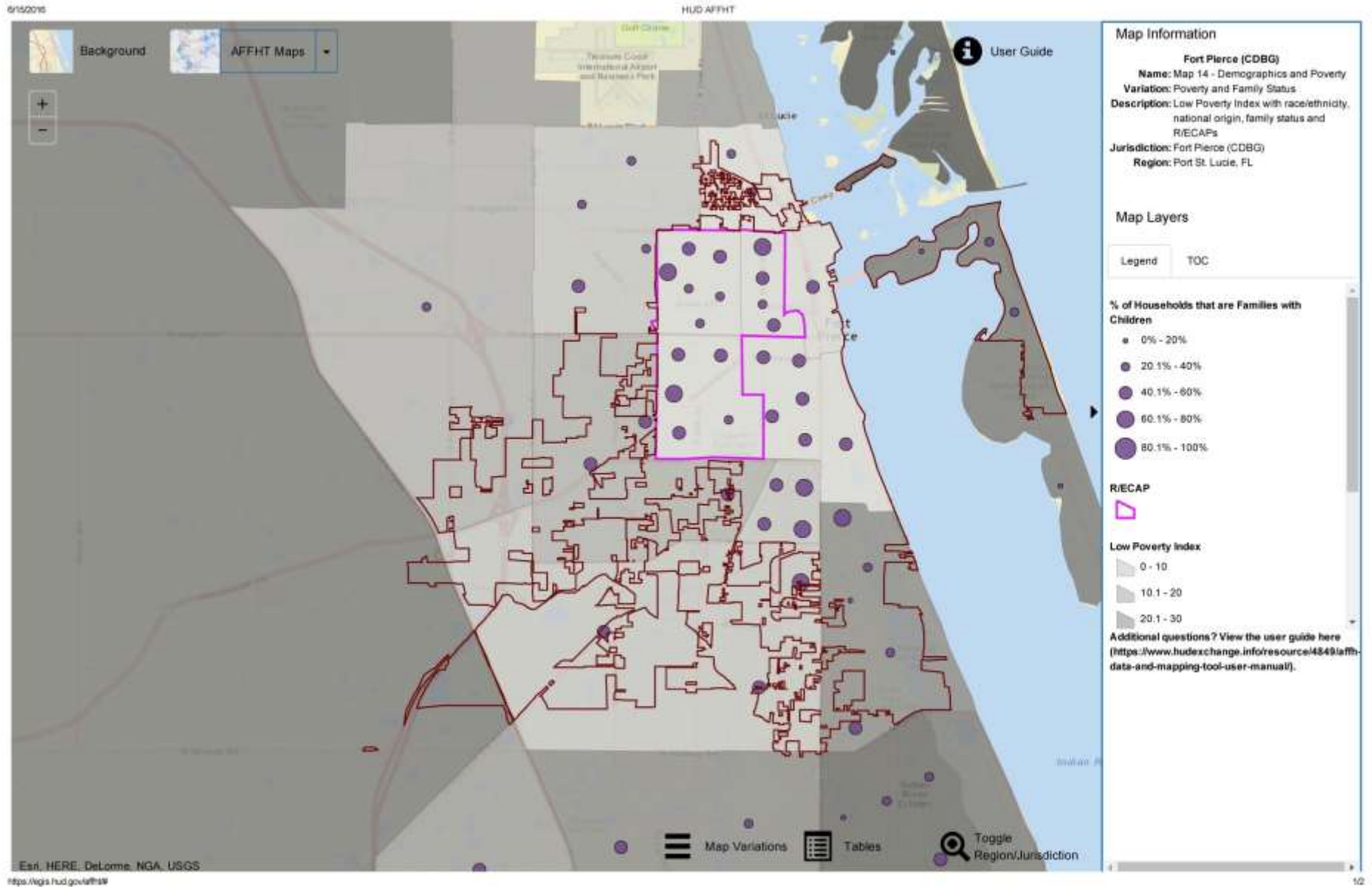
# City of Fort Pierce – Map 14 – Poverty and Race/Ethnicity



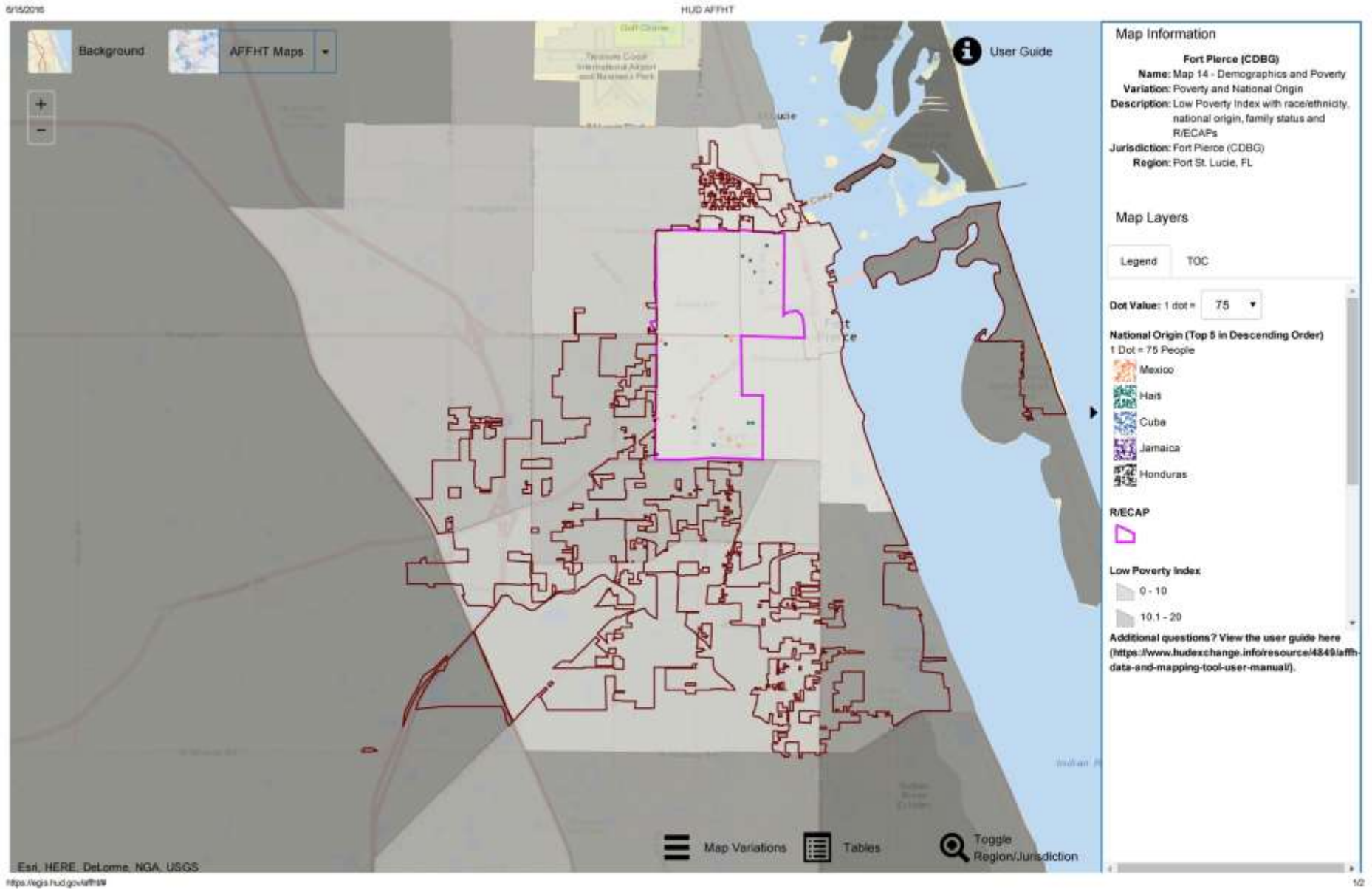
# City of Fort Pierce – Map 14 – Poverty and Familial Status



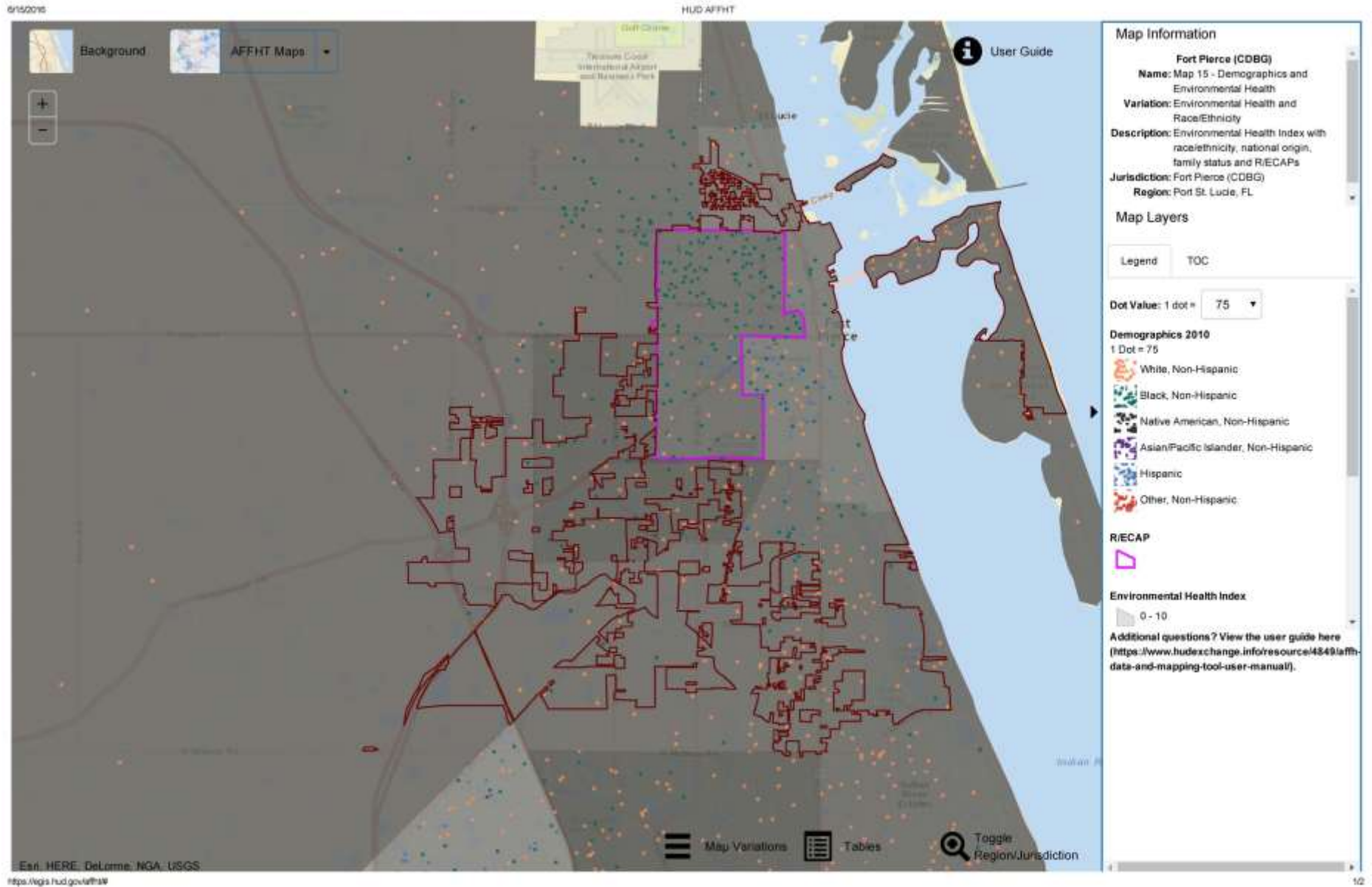
# City of Fort Pierce – Map 14 – Poverty and Familial Status



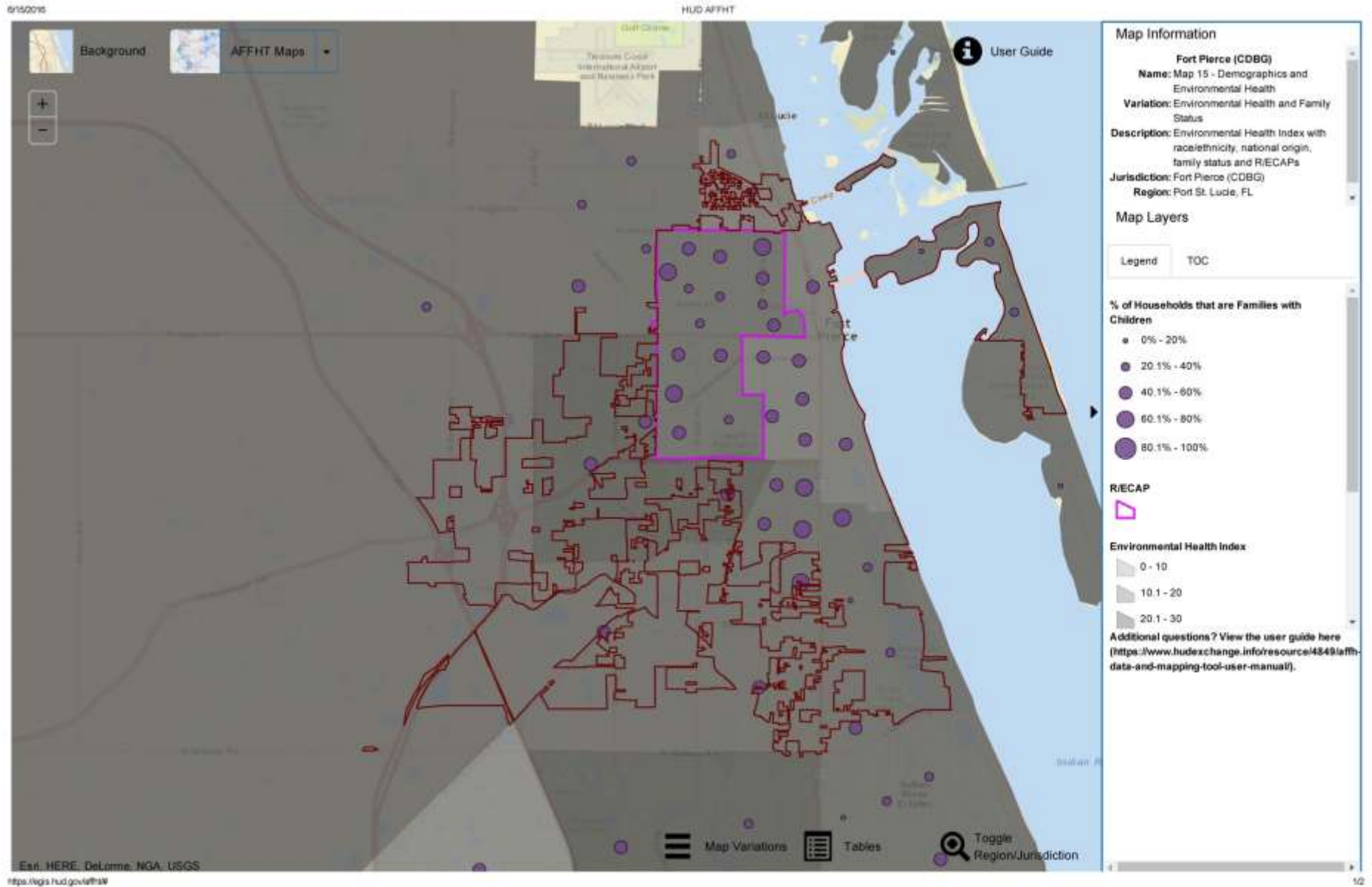
# City of Fort Pierce – Map 14 – Poverty and National Origin



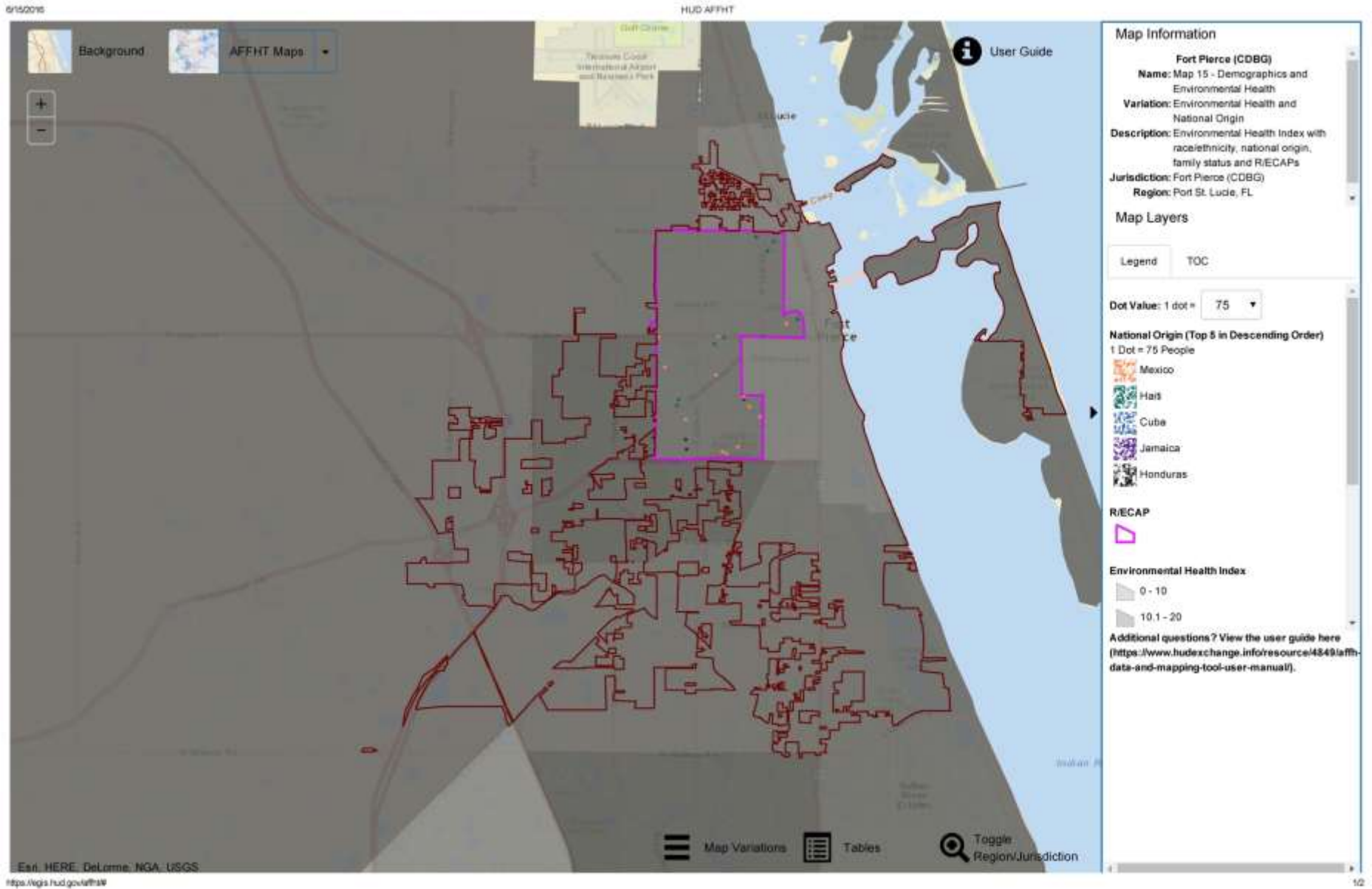
# City of Fort Pierce – Map 15 – Environmental Health and Race/Ethnicity



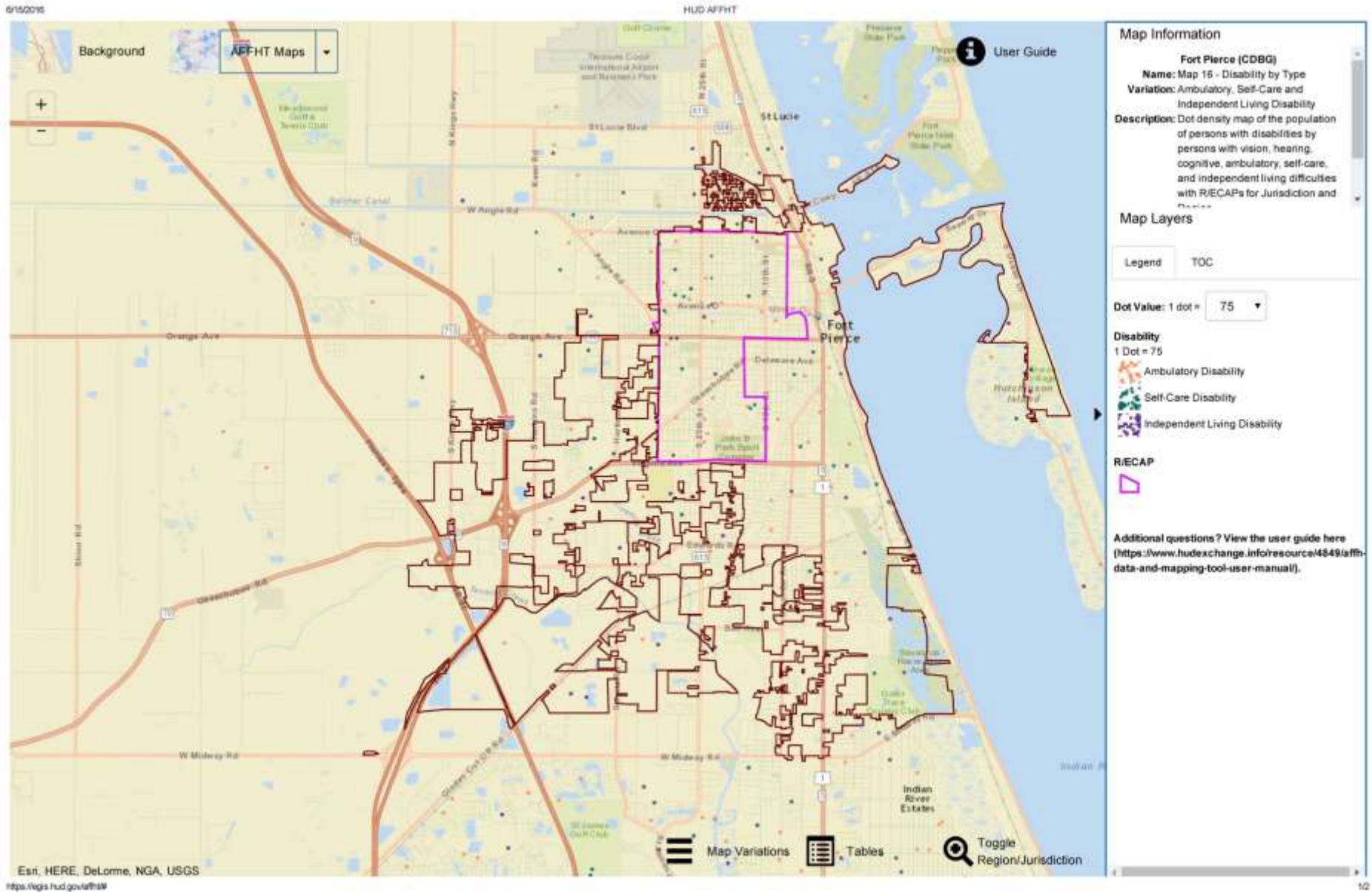
# City of Fort Pierce – Map 15 – Environmental Health and Familial Status



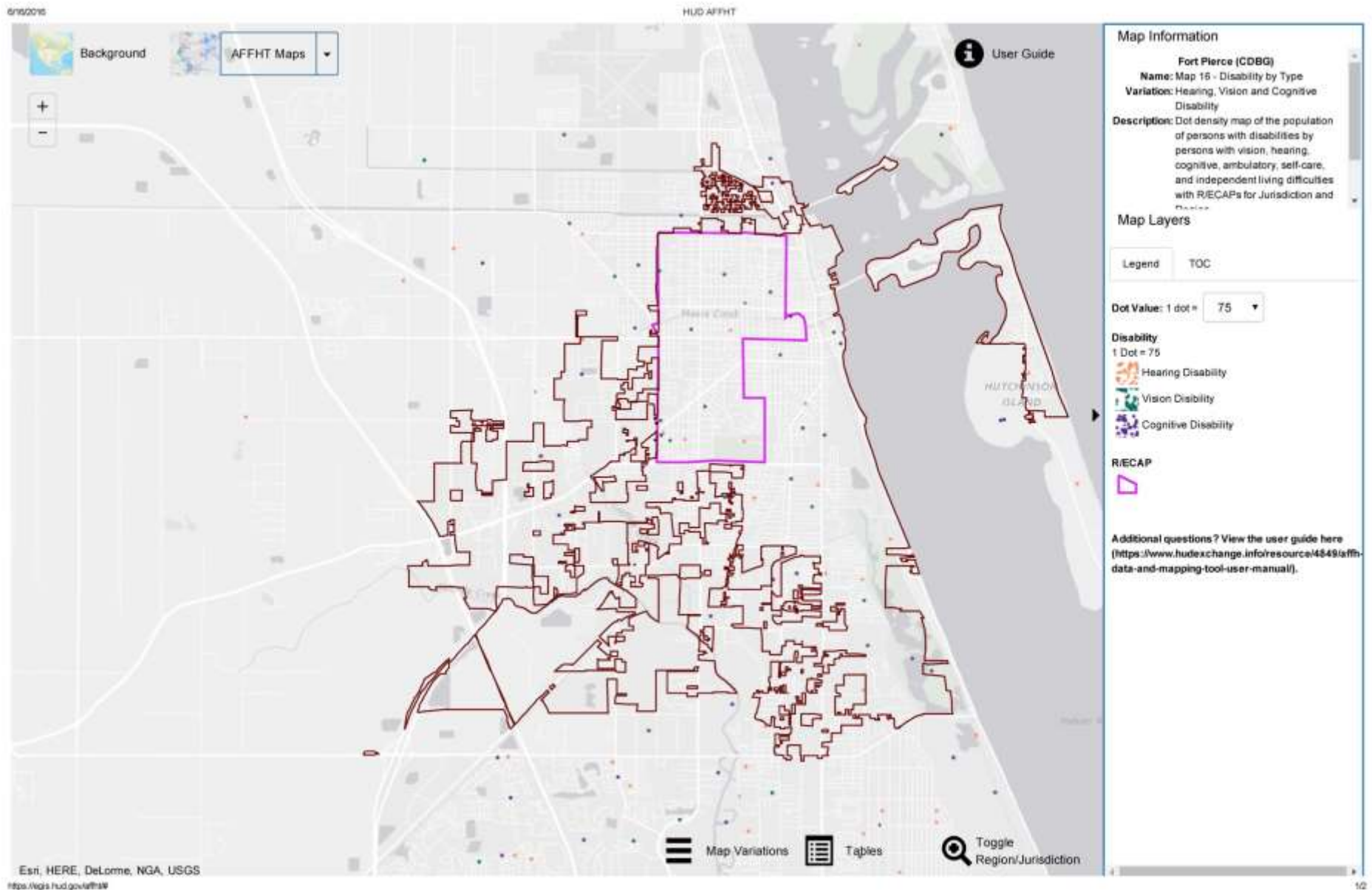
# City of Fort Pierce – Map 15 – Environmental Health and National Origin



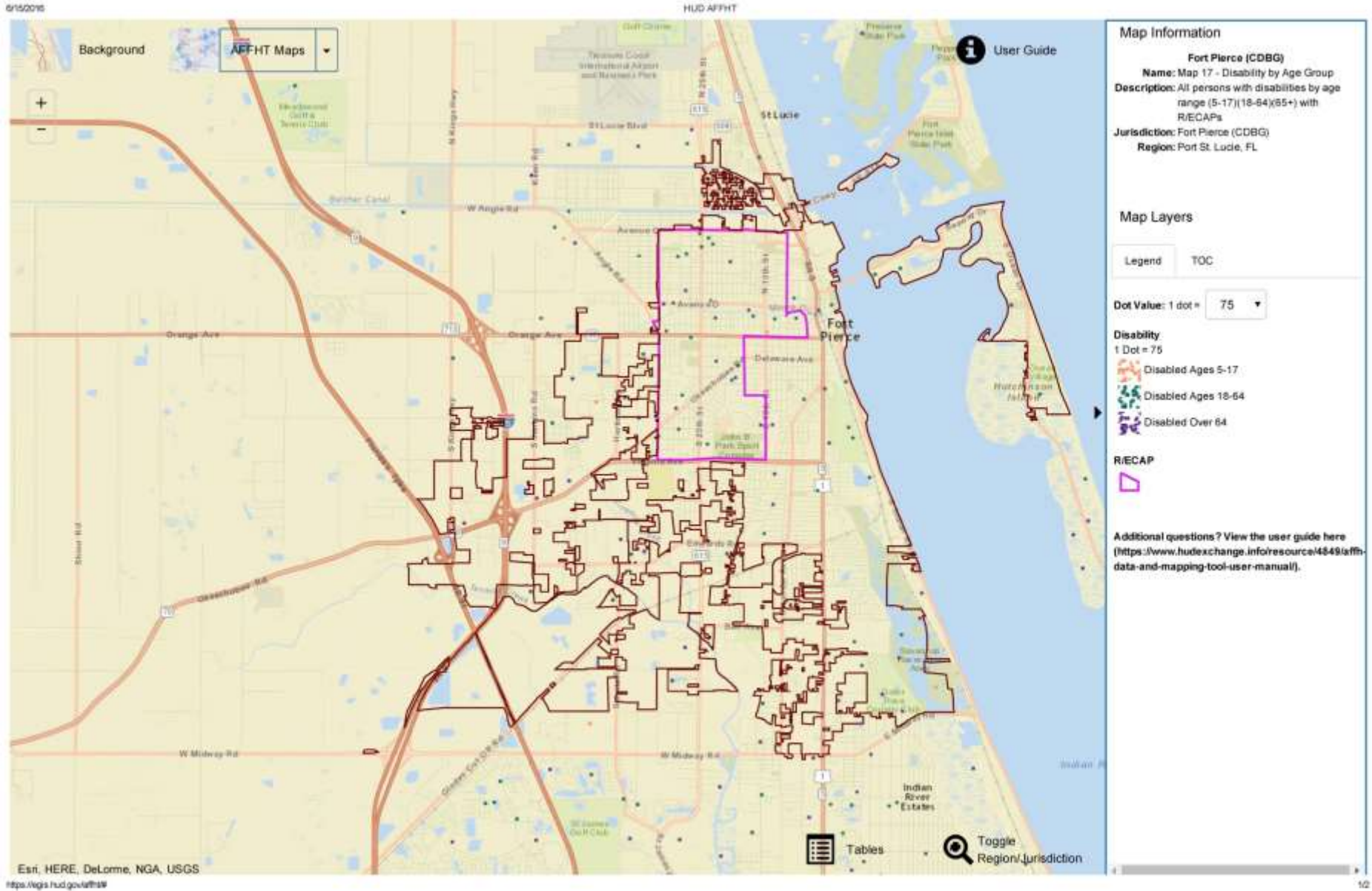
# City of Fort Pierce – Map 16 – Ambulatory, Self-Care and Independent Living Disability



# City of Fort Pierce – Map 16 – Vision, Hearing, Cognitive, Ambulatory, Self-Care, and Independent Living Disabilities



# City of Fort Pierce – Map 17 – Disability by Age Group



## **APPENDIX B – HUD-Provided Tables**

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**Table 1 Demographics** – Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)

**Table 2 Demographic Trends** – Tabular demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

**Table 3 Racial/Ethnic Dissimilarity** – Tabular race/ethnicity dissimilarity index for Jurisdiction and Region

**Table 4 R/ECAP Demographics** – Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

**Table 5 Publicly Supported Housing Units by Program Category** – Tabular data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) for the Jurisdiction

**Table 6 Publicly Supported Housing Residents by Race/Ethnicity** – Tabular race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction

**Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category** – Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction

**Table 8 Demographics of Publicly Supported Housing Developments by Program Category** – Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily for the Jurisdiction

**Table 9 Demographics of Households with Disproportionate Housing Needs** – Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region. Please note that, for the first year, census tract level demographic data in which publicly supported housing developments are located, also including LIHTC developments, are available through the AFFH Data and Mapping Tool which includes a data query function and ability to export tables

(continued)

**Table 10 Demographics of Households with Severe Housing Cost**

**Burden** – Tabular 2 data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

**Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

– Tabular data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

**Table 12 Opportunity Indicators by Race/Ethnicity**

– Tabular data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

**Table 13 Disability by Type**

– Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

**Table 14 Disability by Age Group**

– Tabular data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

**Table 15 Disability by Publicly Supported Housing Program**

**Category** – Tabular data on disability and publicly supported housing for the Jurisdiction and Region

**Table 1 - Demographics**

<b>(Fort Pierce, FL CDBG) Jurisdiction</b>				<b>(Port St. Lucie, FL CBSA) Region</b>		
<b>Race/Ethnicity</b>		<b>#</b>	<b>%</b>		<b>#</b>	<b>%</b>
White, Non-Hispanic		14,422	34.16		287,564	67.80
Black, Non-Hispanic		16,754	39.68		58,866	13.88
Hispanic		9,889	23.42		63,876	15.06
Asian or Pacific Islander, Non-Hispanic		349	0.83		5,915	1.39
Native American, Non-Hispanic		104	0.25		912	0.22
Other, Non-Hispanic		79	0.19		984	0.23
<b>National Origin</b>	<b>Country</b>			<b>Country</b>		
#1 country of origin	Mexico	3,528	8.39	Mexico	8,422	1.99
#2 country of origin	Haiti	2,173	5.17	Haiti	6,158	1.45
#3 country of origin	Cuba	395	0.94	Jamaica	5,719	1.35
#4 country of origin	Jamaica	385	0.92	Guatemala	3,692	0.87
#5 country of origin	Honduras	289	0.69	Cuba	3,651	0.86
#6 country of origin	Canada	121	0.29	Colombia	2,299	0.54
#7 country of origin	Nicaragua	118	0.28	Canada	2,164	0.51
#8 country of origin	Colombia	94	0.22	Honduras	2,018	0.48
#9 country of origin	Guatemala	91	0.22	Germany	1,203	0.28
#10 country of origin	Uruguay	69	0.16	Brazil	1,109	0.26
<b>Limited English Proficiency</b>	<b>Language</b>			<b>Language</b>		
#1 LEP Language	Spanish	4,024	10.17	Spanish	25,260	5.96
#2 LEP Language	French Creole	1,693	4.28	French Creole	4,721	1.11
#3 LEP Language	Other Asian	53	0.13	Chinese	736	0.17
#4 LEP Language	French	36	0.09	French	653	0.15
#5 LEP Language	Tagalog	21	0.05	Italian	462	0.11
#6 LEP Language	German	19	0.05	Portuguese	377	0.09
#7 LEP Language	Scandinavian	16	0.04	Other & unspecified	329	0.08
#8 LEP Language	Polish	14	0.04	Vietnamese	309	0.07
#9 LEP Language	Greek	14	0.04	Polish	208	0.05
#10 LEP Language	Thai	1	0.00	German	201	0.05
<b>Disability Type</b>						
Hearing difficulty		1,221	3.12		18,975	4.72
Vision difficulty		879	2.24		7,828	1.95
Cognitive difficulty		1,764	4.50		20,079	5.00
Ambulatory difficulty		4,038	10.31		35,328	8.79
Self-care difficulty		1,800	4.59		12,422	3.09
Independent living difficulty		2,417	6.17		21,207	5.28
<b>Sex</b>						
Male		20,787	49.23		208,282	49.11
Female		21,435	50.77		215,825	50.89
<b>Age</b>						
Under 18		11,078	26.24		87,754	20.69
18-64		24,958	59.11		241,003	56.83
65+		6,186	14.65		95,350	22.48
<b>Family Type</b>						
Families with children		4,508	46.21		41,648	36.18
Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.						
Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 3: Data Sources: Decennial Census; ACS						
<a href="http://www.hudexchange.info">Note 4: Refer to the Data Documentation for details (www.hudexchange.info).</a>						

**Table 2 - Demographic Trends**

<b>(Fort Pierce, FL CDBG) Jurisdiction</b>							<b>(Port St. Lucie, FL CBSA) Region</b>					
<b>Race/Ethnicity</b>	<b>1990</b>		<b>2000</b>		<b>2010</b>		<b>1990</b>		<b>2000</b>		<b>2010</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
White, Non-Hispanic	23,395	55.53	18,424	44.44	14,422	34.16	208,175	82.91	251,485	78.72	287,564	67.80
Black, Non-Hispanic	15,826	37.56	16,349	39.43	16,754	39.68	30,045	11.97	37,387	11.70	58,866	13.88
Hispanic	2,558	6.07	6,033	14.55	9,889	23.42	10,640	4.24	25,212	7.89	63,876	15.06
Asian or Pacific Islander, Non-Hispanic	197	0.47	371	0.89	349	0.83	1,450	0.58	3,212	1.01	5,915	1.39
Native American, Non-Hispanic	101	0.24	170	0.41	104	0.25	405	0.16	1,333	0.42	912	0.22
<b>National Origin</b>												
Foreign-born	3,570	8.51	7,119	17.19	7,913	18.83	16,394	6.53	30,483	9.54	56,199	13.25
<b>LEP</b>												
Limited English Proficiency	2,027	4.83	5,320	12.84	5,874	13.98	8,267	3.29	17,218	5.39	35,027	8.26
<b>Sex</b>												
Male	19,933	47.52	20,493	49.48	20,787	49.23	122,683	48.87	156,258	48.92	208,282	49.11
Female	22,013	52.48	20,925	50.52	21,435	50.77	128,366	51.13	163,171	51.08	215,825	50.89
<b>Age</b>												
Under 18	10,986	26.19	11,336	27.37	11,078	26.24	52,483	20.91	68,489	21.44	87,754	20.69
18-64	22,958	54.73	22,879	55.24	24,958	59.11	138,988	55.36	171,466	53.68	241,003	56.83
65+	8,003	19.08	7,204	17.39	6,186	14.65	59,578	23.73	79,474	24.88	95,350	22.48
<b>Family Type</b>												
Families w/ children	4,129	38.97	3,787	43.74	4,508	46.21	24,091	32.66	22,867	34.92	41,648	36.18

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

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

**Table 3 - Racial/Ethnic Dissimilarity Trends**

<b>Racial/Ethnic Dissimilarity Index</b>	<b>(Fort Pierce, FL CDBG) Jurisdiction</b>			<b>(Port St. Lucie, FL CBSA) Region</b>		
	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>
Non-White/White	68.16	58.16	49.00	60.68	49.67	44.44
Black/White	75.97	67.58	59.27	72.65	60.17	53.18
Hispanic/White	42.94	43.12	40.21	41.82	42.61	40.94
Asian or Pacific Islander/White	24.49	23.27	23.75	20.92	21.90	29.59

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

**Table 4 - R/ECAP Demographics**

	<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	<b>(Port St. Lucie, FL CBSA) Region</b>
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<b>R/ECAP Race/Ethnicity</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		
Total Population in R/ECAPs	15,089	-	18,389	-		
White, Non-Hispanic	1,774	11.76	3,141	17.08		
Black, Non-Hispanic	10,106	66.98	10,983	59.73		
Hispanic	2,848	18.87	3,872	21.06		
Asian or Pacific Islander, Non-Hispanic	77	0.51	88	0.48		
Native American, Non-Hispanic	44	0.29	49	0.27		
Other, Non-Hispanic	29	0.19	31	0.17		
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs	3,404	-	3,807	-		
Families with children	1,748	51.35	1,951	51.25		
<b>R/ECAP National Origin</b>	<b>Country</b>		<b>Country</b>			
Total Population in R/ECAPs	15,089	-	18,389	-		
#1 country of origin	Haiti	968	6.42	Mexico	1,437	7.81
#2 country of origin	Mexico	953	6.32	Haiti	984	5.35
#3 country of origin	Honduras	233	1.54	Honduras	233	1.27
#4 country of origin	Jamaica	153	1.01	Guatemala	231	1.26
#5 country of origin	Nicaragua	110	0.73	Jamaica	184	1
#6 country of origin	Guatemala	87	0.58	Nicaragua	114	0.62
#7 country of origin	Colombia	64	0.42	Colombia	82	0.45
#8 country of origin	Costa Rica	21	0.14	Cuba	78	0.42
#9 country of origin	Bahamas	17	0.11	Bahamas	27	0.15
#10 country of origin	Poland	14	0.09	Costa Rica	21	0.11
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 2: Data Sources: Decennial Census; ACS						
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>						

**Table 5 - Publicly Supported Housing Units by Program Category**

	<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	
<b>Housing Units</b>	<b>#</b>	<b>%</b>
Total housing units	20,362	-
Public Housing	826	4.06
Project-based Section 8	228	1.12
Other Multifamily		
HCV Program	354	1.74
Note 1: Data Sources: Decennial Census; APSH		
<a href="http://www.hudexchange.info">Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</a>		

**Table 6 - Publicly Supported Housing Residents by Race/Ethnicity**

<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	<b>Race/Ethnicity</b>							
	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Housing Type</b>								
Public Housing	81	10.15	670	83.96	40	5.01	7	0.88
Project-Based Section 8	1	0.45	211	94.20	11	4.91	1	0.45
Other Multifamily								
HCV Program	11	3.48	300	94.94	5	1.58	0	0.00
<b>0-30% of AMI</b>	860	26.63	2,065	63.93	295	9.13	0	0.00
<b>0-50% of AMI</b>	1,745	26.80	3,335	51.23	965	14.82	15	0.23
<b>0-80% of AMI</b>	3,080	32.35	4,385	46.06	1,560	16.39	15	0.16
<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	14,422	34.16	16,754	39.68	9,889	23.42	349	0.83
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>								

**Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category**

<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	<b>Total # units (occupied)</b>	<b>% Elderly</b>	<b>% with a disability*</b>	<b>% White</b>	<b>% Black</b>	<b>% Hispanic</b>	<b>% Asian or Pacific Islander</b>	<b>% Families with children</b>
<b>Public Housing</b>								
R/ECAP tracts	253	9.88	13.83	2.78	95.24	1.98	0.00	73.91
Non R/ECAP tracts	546	33.15	49.82	13.55	78.75	6.41	1.28	35.71
<b>Project-based Section 8</b>								
R/ECAP tracts	217	5.29	5.29	0.45	94.20	4.91		82.82
Non R/ECAP tracts								
<b>Other HUD Multifamily</b>								
R/ECAP tracts								
Non R/ECAP tracts								
<b>HCV Program</b>								
R/ECAP tracts	208	10.20	21.94	1.55	98.45	0.00	0.00	60.71
Non R/ECAP tracts	138	13.53	28.57	6.56	89.34	4.10	0.00	48.12
Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Note 2: Data Sources: APSH								

**Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category**

**Public Housing**

<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	<b>Public Housing Race/Ethnicity (%)</b>	<b>Public Housing Households with Children (%)</b>	
<b>Developments</b>			
Garden Terrace	White	3	74
	Black	95	
	Hispanic	2	
	Asian	0	
Park Terrace	White	22	0
	Black	68	
	Hispanic	9	
	Asian	2	
Scattered Sites	White	5	73
	Black	90	
	Hispanic	4	
	Asian	1	
<b>Project-Based Section 8</b>			
<b>(Fort Pierce, FL CDBG) Jurisdiction</b>	<b>Project-Based Race/Ethnicity (%)</b>	<b>Project-Based Households with Children (%)</b>	
<b>Developments</b>			
Orangewood Village	White	2	98
	Black	81	
	Hispanic	17	
	Asian	0	
Pine Creek Village	White	0	69
	Black	99	
	Hispanic	0	
	Asian	1	
Bethany Court Apartments	White	0	95
	Black	98	
	Hispanic	2	
	Asian	0	
Note 1: For LIHTC properties, this information will be supplied by local knowledge.			
Note 2: Percentages may not add to 100 due to rounding error.			
Note 3: Data Sources: APSH			
<a href="http://www.hudexchange.info">Note 4: Refer to the Data Documentation for details (www.hudexchange.info).</a>			

**Table 9 - Demographics of Households with Disproportionate Housing Needs**

<b>Disproportionate Housing Needs</b>	<b>(Fort Pierce, FL CDBG) Jurisdiction</b>			<b>(Port St. Lucie, FL CBSA) Region</b>		
<b>Households experiencing any of 4 housing problems*</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	3,180	7,515	42.32	47,625	126,205	37.74
Black, Non-Hispanic	3,810	5,890	64.69	10,675	18,160	58.78
Hispanic	1,290	2,065	62.47	9,500	15,880	59.82
Asian or Pacific Islander, Non-Hispanic	15	50	30.00	799	1,854	43.10
Native American, Non-Hispanic	14	24	58.33	73	246	29.67
Other, Non-Hispanic	60	75	80.00	1,005	1,709	58.81
Total	8,365	15,625	53.54	69,655	164,030	42.46
<b>Household Type and Size</b>						
Family households, <5 people	3,865	7,970	48.49	36,680	97,288	37.70
Family households, 5+ people	890	1,540	57.79	7,230	11,890	60.81
Non-family households	3,620	6,125	59.10	25,755	54,855	46.95
<b>Households experiencing any of 4 Severe Housing Problems**</b>						
	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	1,680	7,515	22.36	22,185	126,205	17.58
Black, Non-Hispanic	2,505	5,890	42.53	6,499	18,160	35.79
Hispanic	905	2,065	43.83	5,875	15,880	37.00
Asian or Pacific Islander, Non-Hispanic	15	50	30.00	523	1,854	28.21
Native American, Non-Hispanic	0	24	0.00	44	246	17.89
Other, Non-Hispanic	60	75	80.00	620	1,709	36.28
Total	5,165	15,625	33.06	35,700	164,030	21.76
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (<a href="http://www.hudexchange.info">www.hudexchange.info</a>).</p>						

**Table 10 - Demographics of Households with Severe Housing Cost Burden**

Households with Severe Housing Cost Burden*	(Fort Pierce, FL CDBG) Jurisdiction			(Port St. Lucie, FL CBSA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
<b>Race/Ethnicity</b>						
White, Non-Hispanic	1,575	7,515	20.96	21,160	126,205	16.77
Black, Non-Hispanic	2,305	5,890	39.13	5,990	18,160	32.98
Hispanic	665	2,065	32.20	4,650	15,880	29.28
Asian or Pacific Islander, Non-Hispanic	15	50	30.00	505	1,854	27.24
Native American, Non-Hispanic	0	24	0.00	4	246	1.63
Other, Non-Hispanic	60	75	80.00	520	1,709	30.43
<b>Total</b>	<b>4,620</b>	<b>15,625</b>	<b>29.57</b>	<b>32,829</b>	<b>164,030</b>	<b>20.01</b>
<b>Household Type and Size</b>						
Family households, <5 people	2,100	7,970	26.35	16,280	97,288	16.73
Family households, 5+ people	465	1,540	30.19	2,655	11,890	22.33
Non-family households	2,050	6,125	33.47	13,900	54,855	25.34
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
<a href="http://www.hudexchange.info">Note 5: Refer to the Data Documentation for details (www.hudexchange.info).</a>						

**Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

Housing Type	(Fort Pierce, FL CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	334	41.80	142	17.77	320	40.05	382	47.81
Project-Based Section 8	22	9.69	159	70.04	43	18.94	188	82.82
Other Multifamily								
HCV Program	43	13.07	142	43.16	131	39.82	183	55.62
Note 1: Data Sources: APSH								
<a href="http://www.hudexchange.info">Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</a>								

**Table 12 - Opportunity Indicators, by Race/Ethnicity**

(Fort Pierce, FL CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	29.27	14.47	22.55	18.45	42.15	60.92	74.65
Black, Non-Hispanic	6.74	7.83	7.88	18.77	45.97	47.32	72.90
Hispanic	14.09	12.36	15.87	18.67	46.25	55.09	73.17
Asian or Pacific Islander, Non-Hispanic	22.87	12.11	19.45	18.51	44.32	61.16	74.97
Native American, Non-Hispanic	12.91	10.29	12.19	18.58	45.95	57.68	73.48
<b>Population below federal poverty line</b>							
White, Non-Hispanic	26.98	12.89	20.51	18.56	42.22	60.34	73.71
Black, Non-Hispanic	4.68	7.62	6.16	18.88	46.56	45.29	72.76
Hispanic	11.89	11.90	14.32	18.75	46.35	57.17	72.57
Asian or Pacific Islander, Non-Hispanic	27.00	3.00	6.00	17.00	20.00	90.00	80.00
Native American, Non-Hispanic	8.17	14.51	11.08	18.88	49.01	61.93	73.37
(Port St. Lucie, FL CBSA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	50.85	46.30	37.56	16.64	25.89	47.28	68.05
Black, Non-Hispanic	27.39	29.07	22.39	16.97	29.33	43.75	68.97
Hispanic	34.78	38.94	28.28	16.64	27.38	46.79	67.17
Asian or Pacific Islander, Non-Hispanic	46.24	44.67	34.64	15.88	24.18	45.65	66.92
Native American, Non-Hispanic	40.99	37.51	30.87	16.57	26.67	47.78	68.83
<b>Population below federal poverty line</b>							
White, Non-Hispanic	44.01	42.18	33.64	16.72	26.99	48.16	68.96
Black, Non-Hispanic	14.55	20.32	15.11	18.02	37.94	47.10	71.11
Hispanic	28.53	40.88	25.18	16.83	27.50	48.78	67.13
Asian or Pacific Islander, Non-Hispanic	40.11	51.11	29.21	17.13	31.00	61.23	65.71
Native American, Non-Hispanic	38.00	53.23	27.04	15.26	26.75	53.23	62.70
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
<a href="http://www.hudexchange.info">Note 2: Refer to the Data Documentation for details (www.hudexchange.info).</a>							

**Table 13 - Disability by Type**

Disability Type	(Fort Pierce, FL Jurisdiction)		(Port St. Lucie, FL CBSA) Region	
	#	%	#	%
Hearing difficulty	1,221	3.12	18,975	4.72
Vision difficulty	879	2.24	7,828	1.95
Cognitive difficulty	1,764	4.50	20,079	5.00
Ambulatory difficulty	4,038	10.31	35,328	8.79
Self-care difficulty	1,800	4.59	12,422	3.09
Independent living difficulty	2,417	6.17	21,207	5.28
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>				

**Table 14 - Disability by Age Group**

Age of People with Disabilities	(Fort Pierce, FL CDBG) Jurisdiction		(Port St. Lucie, FL CBSA) Region	
	#	%	#	%
age 5-17 with Disabilities	210	0.54	4,007	1.00
age 18-64 with Disabilities	3,385	8.64	27,390	6.82
age 65+ with Disabilities	2,387	6.09	31,092	7.74
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>				

**Table 15 - Disability by Publicly Supported Housing Program Category**

(Fort Pierce, FL CDBG) Jurisdiction	People with a Disability*	
	#	%
Public Housing	307	38.42
Project-Based Section 8	12	5.29
Other Multifamily		
HCV Program	81	24.62
<b>(Port St. Lucie, FL CBSA) Region</b>		
Public Housing	322	37.10
Project-Based Section 8	12	5.29
Other Multifamily	41	5.56
HCV Program	212	22.63
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		
Note 2: Data Sources: ACS		
<a href="http://www.hudexchange.info">Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</a>		

## **APPENDIX C – Contributing Factors Descriptions**

**Access to financial services.** The term “financial services” refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual’s credit and the overall sustainability of homeownership and wealth accumulation.

**Access to proficient schools for persons with disabilities.** Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA's requirements and has no barriers to entry for persons with mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.

**Access to publicly supported housing for persons with disabilities.** The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. “Accessible housing” refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of “access” here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of “access” here also includes programmatic access, which implicates such policies

as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.

**Access to transportation for persons with disabilities** Individuals with disabilities may face unique barriers to accessing transportation, including both public and private transportation, such as buses, rail services, taxis, and para-transit. The term "access" in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.

**Admissions and occupancy policies and procedures, including preferences in publicly supported housing.** The term "admissions and occupancy policies and procedures" refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:

- Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)
- Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc.).
- Income thresholds for new admissions or for continued eligibility.
- Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities.
- Occupancy limits.
- Housing providers' policies for processing reasonable accommodations and modifications requests.
- Credit or criminal record policies.
- Eviction policies and procedures.

**The availability of affordable units in a range of sizes.** The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children. The availability, type, frequency, and reliability of public transportation Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The availability, type, frequency, and reliability of public transportation affect which households are

connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. "Availability" as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go such as jobs, schools, retail establishments, and healthcare. "Type" refers to method of transportation such as bus or rail. "Frequency" refers to the interval at which the transportation runs. "Reliability" includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

**Community opposition.** The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as "Not in my Backyard," or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

**Deteriorated and abandoned properties.** The term "deteriorated and abandoned properties" refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community's distress and disinvestment and are often associated with crime, increased risk to health and welfare, plunging decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.

**Displacement of residents due to economic pressures.** The term "displacement" refers here to a resident's undesired departure from a place where an individual has been living. "Economic pressures" may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.

**Impediments to mobility.** The term "impediments to mobility" refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This

refers to both Housing Choice Vouchers and other public and private housing options. Many factors may impede mobility, including, but not limited to:

- Lack of quality mobility counseling. Mobility counseling is designed to assist families in moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for each family (e.g. proficient schools for families with children or effective public transportation.). Mobility counseling can include a range of options including, assistance for families for “second moves” after they have accessed 4 stable housing, and ongoing post-move support for families.
- Lack of appropriate payment standards, including exception payment standards to the standard fair market rent (FMR). Because FMRs are generally set at the 40th percentile of the metropolitan-wide rent distribution, some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. Exception payment standards are separate payment standard amounts within the basic range for a designated part of an FMR area. Small areas FMRs, which vary by zip code, may be used in the determination of potential exception payment standard levels to support a greater range of payment standards.
- Jurisdictional fragmentation among multiple providers of publicly supported housing that serve single metropolitan areas and lack of regional cooperation mechanisms, including PHA jurisdictional limitations.
- HCV portability issues that prevent a household from using a housing assistance voucher issued in one jurisdiction when moving to another jurisdiction where the program is administered by a different local PHA.
- Lack of a consolidated waitlist for all assisted housing available in the metropolitan area.
- Discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

**Inaccessible buildings, sidewalks, pedestrian crossings, or other**

**infrastructure.** Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced. Inaccessible government facilities or services Inaccessible government facilities and services may pose a barrier to fair housing choice for individuals with disabilities by limiting access to important community assets such as public meetings, social services, libraries, and recreational facilities. Note that the concept of accessibility includes physical access (including to websites and other forms of communication) as well as policies and procedures. While the Americans with Disabilities Act and related civil rights laws require that newly constructed and altered government facilities, as well as programs and services, be accessible to individuals with disabilities, these laws may not apply in all circumstances and/or may be inadequately enforced.

**Lack of affordable, accessible housing in a range of unit sizes.** What is “affordable” varies by circumstance, but an often used rule of thumb is that a low-

or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. For purposes of this assessment, "accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. The clustering of affordable, accessible housing with a range of unit sizes may also limit fair housing choice for individuals with disabilities.

**Lack of affordable in-home or community-based supportive services.** The term "in-home or community-based supportive services" refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals' knowledge of such supports and their ability to transition to community based settings.

**Lack of affordable, integrated housing for individuals who need supportive services.** What is "affordable" varies by the circumstances affecting the individual, and includes the cost of housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined "the most integrated setting appropriate to the needs of qualified individuals with disabilities" as "a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible." By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals' ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool "supportive services" means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional

settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.

**Lack of assistance for housing accessibility modifications.** The term “housing accessibility modification” refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.

**Lack of assistance for transitioning from institutional settings to integrated housing.** The integration mandate of the ADA and *Olmstead v. L.C.*, 527 U.S. 581 (1999) (*Olmstead*) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD’s Statement on the Role of Housing in Accomplishing the Goals of *Olmstead*, the U.S. Department of Justice’s Statement on *Olmstead* Enforcement, as well as the U.S. Department of Health and Human Services’ Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination on the basis of source of income; coordination between

housing and disability services agencies; increasing the availability of accessible public transportation.

**Lack of community revitalization strategies.** The term “community revitalization strategies” refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

**Lack of local private fair housing outreach and enforcement.** The term “local private fair housing outreach and enforcement” refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement.

**Lack of local public fair housing enforcement.** The term “local public fair housing enforcement” refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.

**Lack of private investment in specific neighborhoods.** The term “private investment” refers here to investment by non-governmental entities, such as corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While “private investment” may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.

**Lack of public investment in specific neighborhoods, including services or amenities.** The term “public investment” refers here to the money government spends on housing and community development, including public facilities, infrastructure, services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

**Lack of regional cooperation.** The term “regional cooperation” refers here to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.

**Lack of resources for fair housing agencies and organizations.** A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information which may indicate whether a housing provider is complying with fair housing laws. “Resources” as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.

**Lack of state or local fair housing laws.** State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or “substantially equivalent” to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.

**Land use and zoning laws.** The term “land use and zoning laws” generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and

other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing. Examples of such laws and policies include, but are not limited to:

- Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.
- Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.
- Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).
- Inclusionary zoning practices that mandate or incentivize the creation of affordable units.
- Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.
- Growth management ordinances.

**Lending Discrimination.** The term “lending discrimination” refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.

**Location of accessible housing.** The location of accessible housing can limit fair housing choice for individuals with disabilities. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single family housing is

generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.

**Location of employers.** The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.

**Location of environmental health hazards.** The geographic relationship of environmental health hazards to housing is an important component of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion, and health effects such as asthma, cancer clusters, obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.

**Location of proficient schools and school assignment policies.** The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility. Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.

**Location and type of affordable housing.** Affordable housing includes, but is not limited to publicly supported housing; however each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

**Occupancy codes and restrictions.** The term "occupancy codes and restrictions" refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons.

Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:

- Occupancy codes with “persons per square foot” standards.
- Occupancy codes with “bedrooms per persons” standards.
- Restrictions on number of unrelated individuals in a definition of “family.”
- Restrictions on occupancy to one family in single family housing along with a restricted definition of “family.”
- Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.
- Restrictions on where voucher holders can live. Private Discrimination The term “private discrimination” refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners’ associations, and condominium boards. Some examples of private discrimination include:
  - Refusal of housing providers to rent to individuals because of a protected characteristic.
  - The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.
  - Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.
  - Failure to grant a reasonable accommodation or modification to persons with disabilities.
  - Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling. Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.

**Quality of affordable housing information programs.** The term “affordable housing information programs” refers here to the provision of information related to affordable housing to potential tenants and organizations that serve potential tenants, including the maintenance, updating, and distribution of the information. This information includes: but is not limited to, listings of affordable housing opportunities or local landlords who accept Housing Choice Vouchers; mobility counseling programs; and community outreach to potential beneficiaries. The quality of such information relates to, but is not limited to:

- How comprehensive the information is (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators)
- How up-to-date the information is (e.g. that the publicly supported housing entity is taking active steps to maintain, update and improve the information).
- Pro-active outreach to widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

**Regulatory barriers to providing housing and supportive services for persons with disabilities.** Some local governments require special use permits for or place other restrictions on housing and supportive services for persons with disabilities, as opposed to allowing these uses as of right. These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

**Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs.** The term "siting selection" refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.

**Source of income discrimination.** The term "source of income discrimination" refers here to the refusal by a housing provider to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income, social security or other retirement income, or tenant-based rental assistance, including Housing Choice Vouchers. Source of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. The elimination of source of income discrimination and the acceptance of payment for housing, regardless of source or type of income, increases fair housing choice and access to opportunity.

**State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings.** State and local laws, policies, or practices may discourage individuals with disabilities from moving to or being placed in integrated settings. Such laws, policies, or practices may include medical assistance or social service programs that require individuals to reside in institutional or other

segregated settings in order to receive services, a lack of supportive services or affordable, accessible housing, or a lack of access to transportation, education, or jobs that would enable persons with disabilities to live in integrated, community-based settings.

**Unresolved violations of fair housing or civil rights law.** Unresolved violations of fair housing and civil rights laws include determinations or adjudications of a violation or relevant laws that have not been settled or remedied. This includes determinations of housing discrimination by an agency, court, or Administrative Law Judge; findings of noncompliance by HUD or state or local agencies; and noncompliance with fair housing settlement agreements.

**City of Fort Pierce Fair Housing Survey - FOR CITIZENS**

Citizen Survey

Thank you for taking part in this survey of impediments to fair housing in the City of Fort Pierce. The information you provide is important and will be used to make housing better, fairer and more affordable. Please answer to the best of your ability. Please do not complete this survey if you have already done so.

**1. Address**

Name (Optional)

Street Address

Zip Code

**2. Please indicate your race, color, or origin:**

Black

Hispanic

White

Hatian

Asian/Pacific Islander

American Indian / Alaska Native

Other (please specify)

**3. How long have you lived in Fort Pierce?**

**4. For your household, please indicate the number of:**

Total People

Children

Handicapped Persons

Elderly (Age 65+)

**Appendix D – Fair Housing Survey – English – Page 2 of 8**

**5. Is your household:**

Male-headed

Female-headed

**6. Do you own or rent your home?**

Own

rent

**7. How old is your home (in years)?**

**8. Do you currently use public transportation?**

**9. If you answered "Yes" to Question #8 above, what is the approximate distance from your home to the closest bus stop?**

**10. Please select the type of home you live in below:**

House

Apartment

Duplex

Group Home

Mobile Home

Other (please specify)

**Appendix D – Fair Housing Survey – English – Page 3 of 8**

**11. Please select your household's yearly income range (from all sources of income):**

- Less Than \$10,000
- \$10,000-\$15,000
- \$15,001-\$20,000
- \$20,001-\$25,000
- \$25,001-\$30,000
- \$30,001-\$35,000
- \$35,001-MORE THAN \$40,000

**12. Please select your highest level of education:**

- Elementary (K-5)
- Middle (6-8)
- High School (9-12)
- Less than 2 Years College
- Finished College
- Masters Degree
- Other (please specify)

**13. Please select all that your home has:**

- Indoor Running Water
- Hot Water
- Water and Sink
- Working Bathroom and/or Shower
- Well
- Septic
- Connection to Public Sewer
- Electricity
- Insurance (Home Owners or Renters)
- Gas
- Air Conditioning
- Heat

**Appendix D – Fair Housing Survey – English – Page 4 of 8**

**14. Please indicate ALL programs you are interested in:**

- Educational Programs (GED and Other)
- Home Owner Educational Programs
- Budgeting and Recovering Credit
- Home Improvement
- Job Training
- Renter's Rights
- Fair Housing Laws
- Other (please specify)

**15. Are you currently receiving Federal, State or other monetary assistance? If Yes, please select from list below:**

- Child Support
- Food Stamps
- Aid for Dependent Children
- Disability
- Retirement
- Social Security
- Other (please specify)

**16. Have you ever been discriminated against regarding access to affordable housing? If Yes, please select if it was for:**

- Rental
- Sale

**Appendix D – Fair Housing Survey – English – Page 5 of 8**

**17. If you answered Yes to Question #16 above, please select the reason(s) for the unfair treatment you received:**

- Race
- Sex
- National Origin
- Familial Status
- Color
- Religion
- Disability/Handicap
- Other (please specify)

**18. If you answered Yes that you have been discriminated against regarding access to affordable housing, please explain:**

**19. Have you ever been the victim of housing discrimination through advertising:**

- Yes
- No

**20. If you answered Yes to #19 above, please select if this was for:**

- Rental Property
- Property for Sale

**Appendix D – Fair Housing Survey – English – Page 6 of 8**

**21. If you answered Yes to #19 above, please select the reason(s) for the unfair treatment you received:**

- Race
- Sex
- National Origin
- Familial Status
- Marital Status
- Disability / Handicap
- Other (please specify)

**22. Have you ever been turned down for a loan to buy a house?**

- Yes
- No

**23. If you answered Yes to #22 above, do you feel you should have been approved?**

- Yes
- No

**24. If you answered Yes to #22 above, please select the reason(s) you believe you received unfair treatment:**

- Race
- Sex
- National Origin
- Familial Status
- Marital Status
- Disability / Handicap
- Other (please specify)

**25. Have you been asked to refinance your home to "consolidate" your bills or pay off debts?**

- Yes
- No

## Appendix D – Fair Housing Survey – English – Page 7 of 8

Predatory Lending or abusive lending practices generally happen when a person has been taken advantage of through financing of a loan or the misuse of collateral available (like equity in your home). These loans tend to have high interest rates, outrageous fees, and unaffordable repayment terms.

**26. Have you ever been the victim of predatory lending?**

- Yes  
 No

**27. If you answered Yes to #26 above, did you seek assistance and counseling?**

- Yes  
 No

**28. If you sought counseling, where did you go:**

**29. If you answered Yes, that you sought counseling after being the victim of predatory lending, what was the final result(s) of the counseling?**

- Refund  
 Refinancing  
 Restructuring of a Loan  
 Other (please specify)

FOR THOSE OVER 55 YEARS OF AGE OR OLDER, PLEASE ANSWER THESE SPECIFIC QUESTIONS:

**30. Do you currently live in Senior Housing?**

- Yes  
 No

**31. If you answered Yes to #30 above, what type? (Restricted, Assisted, etc.)**

**32. Do you intend to move in the near future?**

- Yes  
 No

**Appendix D – Fair Housing Survey – English – Page 8 of 8**

33. If you answered Yes to #32 above, why do you intend to move? (examples: be near family, physical needs, etc.)

34. Could you afford assisted living, if it were necessary?

Yes

No

35. Has your residence been modified for any disability?

Yes

No

36. If you answered Yes to #35 above, what was changed or added? (examples wheel chair ramp, toilet seat, widening doors)

37. If you answered Yes that your home has been modified for a disability, how were the modifications financed? (examples: home equity loan, personal loan, City assistance)

38. Have you ever considered or applied for a Reverse (HECM) Mortgage?

Yes

No

39. If you answered Yes to #38 above, did you receive the Reverse Mortgage?

Yes

No

40. Please write any comments you would like to add regarding Fair Housing issues in Fort Pierce below.

**Encuesta de Vivienda Justa - Español**

Encuesta ciudadana de Vivienda Justa

Gracias por participar en esta encuesta de impedimentos a la vivienda justa en la ciudad de Fort Pierce. la información que hemos proporcionado es importante y será utilizada para hacer la vivienda mejor, más justo y más asequible . Por favor, respondan a la medida de su capacidad. Por favor, no llenar esta encuesta si ya lo ha hecho.

**1. Dirección**

Nombre: (Opcional)

Dirección

Código postal

**2. Por favor indique su raza, color y origen**

Negro

Hispano

Blanco

Haitiano

Asiático / Islas del Pacifico

Indios americanos / nativos de Alaska

Otro (especifique)

**3. Cuánto tiempo ha vivido en Fort Pierce ?**

**4. Para su hogar, por favor indique el número de:**

Total de personas

Niños

Las personas con discapacidad

Personas de edad avanzada ( mayor de 65 años )

**Appendix D – Fair Housing Survey – Spanish – Page 2 of 8**

**5. Su casa es:**

Hombres - Mayoria

Mujeres - Mayoria

**6. Es dueño o alquila su casa?**

Propio

Alquilar

**7. Qué edad tiene su casa ( en años ) ?**

**8. Actualmente usted usa transporte público?**

**9. Si su respuesta es " Sí " a la pregunta # 8, cuál es la distancia aproximada desde su casa a la parada de autobús más cercana ?**

**10. Por favor, seleccione el tipo de casa en que vive a continuación:**

Casa

Apartamento

Dúplex

Grupo Hogar

Casa móvil

Otros (especificar)

**11. Por favor, seleccione ingreso anual de su hogar ( de todas las fuentes de ingreso ):**

- Menos que \$10,000
- \$10,000-\$15,000
- \$15,001-\$20,000
- \$20,001-\$25,000
- \$25,001-\$30,000
- \$30,001-\$35,000
- \$35,001-Mas que \$40,000

**12. Por favor seleccione el nivel más alto de educación:**

- Primaria (K-5)
- Intermedia (6-8)
- secundaria (9-12)
- Menos de 2 años de universidad
- universidad terminado
- Maestría
- Otro (especifique)

**13. Por favor seleccione todo lo que su casa tiene :**

- Agua dentro de la casa
- Agua caliente
- Agua y fregadero
- Baño y / Ducha funcionando
- Pozo
- Séptico
- Conexión pública a la alcantarilla
- Electricidad
- Seguros ( propietarios o inquilinos Inicio )
- Gas
- Aire acondicionado
- Calentador

## Appendix D – Fair Housing Survey – Spanish – Page 4 of 8

**14. Por favor indique TODOS los programas que le interesan :**

- Programas Educativos ( GED y Otros )
- Programas Educativos Para dueño de Casa
- Presupuestos y Recuperación de Crédito
- Mejorar el hogar
- Entrenamiento Profesional
- Los derechos del inquilino
- Leyes de vivienda justa
- Otros (especificar)

**15. Está recibiendo ayuda federal, estatal o otra ayuda monetaria ? si su respuesta es si, por favor seleccionar de la lista a continuación:**

- Manutención de los hijos
- Cupones de alimentos
- Ayuda para Niños Dependientes
- Discapacidad
- Jubilación
- Seguridad Social
- Otros (especificar)

**16. Alguna vez ha sido discriminada en el acceso a una vivienda asequible ? En caso afirmativo , por favor seleccione si fue por :**

- Alquiler
- Venta

**17. Si su respuesta a la pregunta # 16 es si, por favor seleccione el motivo ( s ) para el tratamiento injusto que recibió :**

- Raza
- Sexo
- Origen nacional
- Estado familiar
- Color
- Religión
- Discapacidad / Handicap
- Otros (especificar)

**18. Si su respuesta es Sí que ha sido discriminado en relación con el acceso a una vivienda asequible , por favor explique :**

**19. Alguna vez has sido víctima de discriminación en la vivienda a través de la publicidad :**

- Si
- No

**20. Si su respuesta a # 19 fue si , por favor seleccione si esto fue por:**

- Alquiler
- Propiedad en venta

**21. Si su respuesta a # 19 fue si, selecciona el motivo ( s ) para el tratamiento injusto que recibió :**

- Raza
- Sexo
- Origen nacional
- Estado familiar
- Estado civil
- Discapacidad / Handicap
- Otros (especificar)

**22. Alguna vez ha sido rechazado para un préstamo para comprar una casa ?**

Si

No

**23. Si su respuesta es si al # 22, se siente que usted debe haber sido aprobado ?**

Si

No

**24. Si su respuesta a # 22 es si, selecciona el motivo ( s ) cree que ha recibido un trato injusto :**

Raza

Sexo

Origen nacional

Estado familiar

Estado civil

Discapacidad / Handicap

Otros (especificar)

**25. Le han solicitado para refinanciar su casa para " consolidar " sus cuentas o pagar las deudas ?**

Si

No

Préstamos abusivos o las prácticas de préstamos abusivos generalmente ocurren cuando una persona ha sido aprovechado a través de la financiación de un préstamo o el mal uso de garantías disponibles (como el valor de su casa ) . Estos préstamos tienden a tener altas tasas de interés, tarifas exorbitantes , y plazos de pago inaccesibles .

**26. Si su respuesta a la pregunta #26 es si , Buscó ayuda y el asesoramiento?**

Si

No

**27. Si usted buscó asesoramiento, adónde fue :**

**28. Si su respuesta es Sí , que buscó ayuda después de haber sido víctima de un préstamo predatorio , qual fue el resultado final ( s ) de la orientación?**

Reembolso

Refinanciación

La reestructuración de un préstamo

Otros (especificar)

Para los mayores de 55 años de edad o mayores, por favor conteste las preguntas concretas:

**29. Acutal mente usted vive en viviendas para personas mayores?**

Si

No

**30. Si su respuesta a # 30 es si, qué tipo? (Restringido , asistida , etc. )**

**31. Tiene la intención de moverse en el futuro?**

Si

No

**32. Si su respuesta a # 31 es si , por qué va a pasar ? ( Ejemplos : estar cerca de la familia , las necesidades físicas , etc. )**

**33. Podría pagar vivienda asistida, si fuera necesario?**

Si

No

**34. Se ha modificado su residencia por cualquier incapacidad ?**

Si

No

**35. Si su respuesta fue si al # 34, que ha sido cambiado o añadido ? ( Ejemplos rueda rampa de silla, asiento del inodoro , la ampliación de las puertas )**

**36. Si su respuesta es si ; que su casa ha sido modificada por una discapacidad , cómo se financiaron las modificaciones? ( Ejemplos : hogar préstamo , préstamo personal, la asistencia de la ciudad )**

**37. Alguna vez ha considerado o solicitado una hipoteca inversa ( HECM ) ?**

- Si
- No

**38. Si su respuesta fue si a # 37, recibió la Hipoteca Inversa?**

- Si
- No

**39. Es usted de origen o ascendencia española , hispano o latino?**

- No, no soy español / hispano / latino
- Si , Puerto Riqueño
- Si , mexicano, mexicano americano, chicano
- Si, Cubano
- Si, otro grupo español / hispano / latino

**40. Por favor escriba cualquier comentario desea agregar temas Feria de vivienda en Fort Pierce abajo.**

## **Appendix E – Fair Housing Survey Results**

Following is an overview of the Fair Housing Survey results:

- 100% of respondents completed the survey in English.
- 57% of respondents indicated that they have encountered housing discrimination; of those, 88% felt landlord/property managers were responsible.
- 82% of the discrimination occurred in rental property situations.
- One-half of those indicated discrimination felt it was because of family status (families with children).
- Over 90% indicated that they did not report the discrimination incident.

## **Appendix F – Verbal and Written Comments Received from Fair Housing Surveys, Community Workshops/Presentations, and Public Hearings**

### **Summary of Verbal Comments Received During Community Workshops/Presentations, Public Hearings:**

**Affordable Housing:** Increasing rents, coupled with low vacancies have made it difficult to find affordable rental units. Some felt that landlords use the strong market to discriminate among potential renters.

**Information on Affordable Housing Discrimination:** Some comments were made regarding the lack of information on tenant rights, such as when landlords asked for immigration documents. Residents did not know where to get help when discriminated against.

**Mothers with Children:** A common comment was the difficulty of families, especially mothers with children, in finding housing.

**Overcrowding:** This issue was discussed by both residents and property managers.

**Special Needs Housing:** Comments were received pertaining to the need for affordable rental housing units for seniors, persons with disabilities, and veterans.

### **Written Comments Received via Fair Housing Surveys:**

- Slum lords do not take care of their rental property.
- Criminal Background Checks are a major barrier to fair housing rights in Fort Pierce.
- Interesting survey.
- Stagnant wages along with the lack of living wages and poor credit are the biggest contributors to housing inequality.
- The strongest barrier is the diminishing supply of low-income housing: This needs to be a priority initiative by the City regarding designating new/renovated structures for low-income housing using grants and other incentives.
- Self-esteem of renters is a big barrier to integrating housing.
- Additional resources are required.
- Rental Prices in Fort Pierce haven gotten OUT OF CONTROL, now even people with good jobs are having problems accessing affordable housing.
- The City of Fort Pierce needs to engage real estate professionals for consultation and insight into challenges the directly impact them daily in underserved communities.
- There is not enough affordable housing in Fort Pierce.
- When seeking apartments, we are often told by property managers or landlords, "we don't work with programs."
- The largest barrier to folks using subsidy programs is a lack of apartments at HUD mandated fair market rates in desirable areas, and landlords willing to work with programs.
- FPHA fair housing activities are not enough. They should give more vouchers. The City of Fort Pierce should review its own policies on the locations of investments, etc.
- Judges in eviction courts who do not understand tenants' rights.
- WE need to address the drastic shortage of affordable housing in Fort Pierce.
- In my opinion, a lot of neighborhood problems can be resolved with stricter laws on absentee landlords who reside outside the state. They don't have the vested interest they should and as a result should be pay a levy as a non-resident.

All comments were accepted.



**City of Fort Pierce, Florida  
Department of Urban Redevelopment**

Community Development Block Grant (CDBG) Program

**CITIZEN PARTICIPATION PLAN**

**As Amended  
May 16, 2016**

# **CITIZEN PARTICIPATION PLAN**

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## **I. INTRODUCTION**

Community Development Block Grant (CDBG) and Section 108 Loan Guarantee funds are provided to the City of Fort Pierce by the U.S. Department of Housing and Urban Development (HUD) for the development of viable communities characterized by decent, safe and sanitary housing, a suitable living environment, and expanding economic opportunities. These activities must benefit low and moderate-income persons (household income up to 80% of the median income adjusted for family size), eliminate slums and blighted conditions, or meet urgent community needs. Citizen involvement is actively sought as part of the CDBG and Section 108 Loan program, and is always an integral part of the decision making process. Efforts are made to increase City residents' awareness of events transpiring within their neighborhoods. The City of Fort Pierce has devised a Citizen Participation Plan for public involvement in the planning process.

## **II. FEDERAL MANDATE**

The Housing and Community Development Act of 1974, as amended, with 24 CFR 570.301, 24 CFR 91.105, and CFR 570.704 establishes the following requirements for the City to meet in preparing its annual statement of community development objectives and projected use of funds.

A memorandum dated March 14, 2016, entitled "Incorporating 24 CFR Part 5, Affirmatively Furthering Fair Housing into 24 CFR 91.10 Consolidated Program Year, 24 CFR 91.105 Citizen Participation Plan for Local Governments and 24 CFR 91.115 Citizen Participation Plan for States promoted the Final Rule at 24 CFR Part 5 regarding a grantee's obligation to Affirmatively Further Fair Housing (AFFH). The new rule sets forth a meaningful and transparent process to identify and understand local and regional fair housing issues and to set goals for improving fair housing choice and access to opportunity.

Under the new rule, the Citizen Participation Plan requirements at 24 CFR 91.105 for local governments and 24 CFR 81.115 for states have been revised to accommodate the new AFFH, the analysis undertaken pursuant to 5.154 requiring consultation and community participation in the analysis of fair housing data, an assessment of fair housing issues and contributing factors and an indication of fair housing priorities and goals.

These requirements shall serve to permit public examination of the City's statement of objectives to further fair housing and the use of funds and efforts to enhance public accountability for these grant funds, and facilitate coordination of activities at different levels of government.

Accordingly, the City shall:

1. Furnish citizens information concerning:
  - a. The amount of funds available, including Section 108 Loan Guarantee program funds for proposed community development and housing activities;
  - b. The range of activities that may be undertaken, including the estimated amount proposed for activities that will benefit low and moderate income persons (household income up to 80% of the median income adjusted for family size); and
  - c. The plans of the City for minimizing displacement of persons resulting from activities funded under the CDBG and Section 108 Loan Guarantee programs and its plans to assist those persons actually displaced.
2. Publish a proposed statement of objectives and use of funds in such a manner to afford affected citizens an opportunity to examine its content and to submit comments on the proposed statement. In general, fifteen (15) days will be considered sufficient published notice.
3. Hold two or more public hearings at different stages of the program year to obtain the public's views and provide to the public the City's responses to community development

and housing needs;

4. Provide citizens with reasonable access to records regarding the past use of the City's CDBG and Section 108 Loan Guarantee funds;
5. Provide citizens with reasonable notice of, and opportunity to comment on any substantial proposed change in the use of funds from one activity to another;
6. Consider such citizen comments and views, and if deemed appropriate by the City, modify its proposed statement before being finalized; and
7. Make its final statement of objectives and use of funds available to the public. Any final statement may be amended from time to time in accordance with these same procedures.

Any participation activities outlined herein meet and exceed these federal mandates in keeping with the City's desire to have its Community Development program responsive to the needs of its residents.

### **III. DEFINITIONS**

**Analysis of Impediments to Fair Housing Choice Report** - As a recipient of federal funding from the U.S. Department of Housing (“HUD”), the City of Fort Pierce is required to analyze the impediments to fair housing choice and then take steps to overcome the impediments it identifies. This Analysis of Impediments to Fair Housing Choice (“AI”) is intended to satisfy this requirement and enable the City to more quickly overcome the barriers to full and equal access to safe, decent, affordable housing in economically vibrant, diverse communities throughout the City.

**Annual Action Plan:** This document allocates one year’s funding (entitlement and program income) to specific projects and activities for the CDBG program. Development of the Five-Year Consolidated Plan and Annual Action Plan is the primary focus of citizens participating in the Citizen Participation Plan.

**Area Median Income:** HUD surveys major metropolitan areas annually to development an index of area median income by household size. Most CDBG-funded activities and programs must benefit primarily low- and moderate-income households.

**CAPER:** The Consolidated Annual Performance Evaluation Report (CAPER) is the document used to evaluate the performance of programs including CDBG and Section 108 Loan Guarantees. It reports on the progress made on the five-year Consolidation Plan through the actions identified in the Annual Action Plan.

**Citizen Participation Plan:** This plan is prepared to facilitate and encourage public participation and involvement in the Consolidated Plan process and the City’s CDBG program, especially by low- and moderate-income persons. The plan identifies the public participation requirements as identified by federal regulations (24 CFR Part 91).

**Community Development Block Grant (CDBG) Program:** The Community Development Block Grant (CDBG) Program is a Federal program created under the Housing and Community Development Act of 1974. This program provides grant funds to local and state governments to be used to develop viable urban communities by providing decent housing with a suitable living environment and expanding economic opportunities to assist low and moderate-income residents. Grant funds are awarded to programs that offer improvements to public facilities and public services, including the acquisition, planning, and redevelopment of real property, and other hard cost. A small amount of grant funds is also available for program administration, operations, staffing, equipment, and other soft costs.

**Consolidated Annual Performance Evaluation Report (CAPER):** This document reports on the progress in carrying out the Consolidated Plan and Annual Action Plan. The report is prepared annually by the City in accordance with federal regulations (24 CFR Part 91). It is due to HUD no later than 90 days after the end of the City's fiscal year or September 28.

**Consolidated Plan:** This document serves as the City's application for CDBG funds and sets forth the priorities and strategies to address the needs of primarily low and moderate-income persons and areas in the City. It typically covers a three- or five-year time period. It is submitted to HUD in accordance with federal regulations (24 CFR Part 91). This document is required to receive HUD Community Planning and Development funds, and exists in forms that detail housing needs and strategies over three and five-year periods.

**Consolidated Plan Documents:** These include the Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER), as well as any Substantial Amendment to the Consolidated Plan or Annual Action Plan.

**Extremely Low-Income:** Households with incomes less than 30 percent of the area median family income, adjusted for household size.

**Low and Moderate-Income Households:** These are households earning less than 80 percent of the area median income. They are broken down into the following income designations.

**Low and Moderate-Income Neighborhood:** In general, this is defined as a census tract(s) or block group(s) where a minimum of 51 percent of the residents have low or moderate incomes (i.e., not exceeding 80 percent of the area median income).

**Low-Income:** Households with incomes between 31 and 50 percent of the area median family income, adjusted for household size.

**Moderate-Income:** Households with incomes between 51 and 80 percent of the area median family income, adjusted for household size.

**Program Year:** The "program year" chosen by the City of Fort Pierce is October 1 through September 30.

**Section 108 Loan Guarantee:** The Section 108 Loan Guarantee program is the loan guarantee provision of the Community Development Block Grant Program (CDBG). Section 108 provides communities with a source of financing for economic development, housing rehabilitation, public facilities, and large-scale physical development projects. It allows local governments to transform a small portion of their CDBG funds into federally guaranteed loans large enough to pursue physical and economic revitalization projects that can renew entire neighborhoods.

#### **IV. OPPORTUNITIES FOR PARTICIPATION**

During the process of developing the annual statement of community development objectives and allocating the available funds to specific activities to carry out these objectives, formal citizens' involvement opportunities will be available. Public comment will be solicited at a series of public meetings, as well as in response to the City publication of its proposed objectives and use of funds.

**Public Hearings:** In order to provide citizens the opportunity to participate in the development of the Action Plan, Consolidated Plan, the Consolidated Annual Performance and Evaluation Report, the Citizen Participation Plan, the creation of the Analysis of Impediments to Fair Housing Report, and substantial amendments to these

documents, public hearings will be conducted by the City Commission during the public hearing portion of regularly scheduled commission meetings. This will provide the opportunity of participation by low and moderate-income persons, residents of slum and blighted neighborhoods, and handicapped citizens. All hearings will be held in a location that is accessible to persons with mobility impairments. If notified in a timely manner, the City, local supportive service organizations, and/or an interpreter will be on hand to provide assistance whenever a significant number of non-English speaking residents are expected to participate in a public hearing. In addition, all reasonable accommodation will be made for deaf interpreter services, if requested.

Two hearings before the City Commission, at different stages, will be held after publication of the plan's summary, detailing its proposed statement of objectives and use of funds. The first hearing will allow for public comments on the proposed use of funds, enable any affected party the opportunity to discuss community needs, objectives and proposed use of funds, review of program performance, and insure that the opportunity to comment on the proposed statement is afforded. The final public hearing will allow public comments following approval to submit to HUD.

All public hearings will be advertised in the non-legal section of a local newspaper of general circulation at least fifteen (15) days prior to such hearing indicating date, time, location, and topic to be discussed. Radio announcements, civic club announcements, and mail outs will also be utilized to properly notify and encourage participation from citizens, including businesses, developers, community organization, faith-based organizations, minorities, non-English speaking, persons with disabilities, and low and moderate income person who reside in slum or blighted areas or other areas of the hearings.

The City will provide post timely notices of public meetings in public areas and will provide timely access to information and records relating to the City's proposed and actual use of federal assistance, grant funds, loan funds, and program income. A fifteen (15) day advance prior notice of public hearings will be provided, with a thirty (30) day public comment period.

The City shall make available all documents relevant to the programs during normal working hours at City Hall, 100 N. U.S. Highway #1, in the Department of Urban Redevelopment, at no cost to the citizen. These documents will also be available at the St. Lucie County Public Library reference department. All documents will be made available in a form accessible to persons with disabilities upon request.

The City may also explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance as directed by the Urban Redevelopment Department. Unless otherwise noted in this document, all communication regarding the Citizen Participation Plan, the Consolidated Plan, Annual Action Plans, CAPER Reports and Analysis of Impediments to Fair Housing Report should be directed to:

Urban Redevelopment Department  
City of Fort Pierce City Hall  
100 North U.S. Hwy. 1  
Fort Pierce, Florida 34950  
772-467-3183

## **V. ADEQUATE INFORMATION**

The Department of Urban Redevelopment will provide full disclosures and public access to CDBG and Section 108 Loan Guarantee program information. At the beginning of the planning process for each program year, the following information will be published in a local newspaper of general circulation:

1. The total amount of Community Development Block Grant and Section 108 Loan Guarantee funds available for the new program year.
2. The range of activities that may be undertaken, the types of activities previously done and types of eligible activities.
3. The process for development and final approval of projects or activities
4. All public hearings regarding the CDBG and Section 108 Loan Guarantee Program; and others.

**Access to Records:** Upon finalization by the City Commission of the statement of objectives and activities to be funded, the City shall make available all documents relevant to the programs during normal working hours, 8:00 AM – 5:00 PM, at the Fort Pierce City Hall, 100 N. U.S. Highway #1, in the Department of Urban Redevelopment, at no cost to the citizen.

The Department of Urban Redevelopment will provide full and timely disclosure of its program records and information consistent with applicable laws in formats to include persons with disabilities, upon request. Available documents include:

- All mailings and promotional information.
- Copies of all meeting minutes and public hearing notices.
- All key documents, including previous annual applications, letters of approval, grant agreements, citizen participation plan, annual performance reports, Analysis of Impediments to Fair Housing Choice report, Consolidation Plan, HUD project reports, project proposals, environmental review records, and others.
- Copies of all relevant HUD regulations.
- Project and activity files.

The Department of Urban Redevelopment will accept citizen responses, requests and/or complaints any time throughout the year, and will respond in writing to written complaints and/or grievances, within fifteen (15) working days, where practicable.

## **VI. ENVIRONMENTAL REVIEW AND RELEASE OF FUNDS NOTICES**

The City conducts environmental assessments on all activities funded under the CDBG grant and Section 108 Loan Guarantee projects, prior to releasing these federal dollars and beginning the actual improvements. This environmental assessment is done to determine if there would be any significant negative impacts on the local environment that would result if the project is implemented. This review also is designed to assess each project's compliance with all applicable federal environmental laws.

The final step in this environmental review process is the publication of a legal notice stating the City's determination of the impact each project will have. This determination can either be a finding of no significant impact, (in which case, funds may be requested to be released from HUD), or a finding of significant impact, (in which case a full Environmental Impact Statement must be prepared). If the latter case is found, the Environmental Impact Statement must be completed prior to taking any further action.

After one of these two findings has been made, and all additional requirements have been fulfilled, the Department of Urban Redevelopment will request the release of funds from the Department of Housing and Urban Development. An advertisement to this effect will

be placed in the legal section of a newspaper of general circulation stating a fifteen (15) day waiting period for public review and comments.

During the waiting period, HUD will accept an objection to its approval of the release of funds and acceptance of the certification only if it is on one of the following basis: (a) That the certification was not in fact executed by the chief executive officer or other officer of applicant approved by HUD; or (b) that applicant's environmental review record for the project indicates omission of a required decision, finding, or step applicable to the project in the environmental review process. Objections must be prepared and submitted in accordance with the required procedure (24 CFR Part 58), and may be addressed to HUD at the Department of Housing and Urban Development, Atlanta Area Office, 645 Peachtree Street, Atlanta, Georgia, 30323. Objections to the release of funds on basis other than those stated above will not be considered by HUD. These two notices, finding of no significant impact, and request for release of funds, will run together whenever possible.

## **VII. ANNUAL PERFORMANCE AND GRANTEE REPORTS**

The City prepares and publishes annual final statement reports on the progress of CDBG and Section 108 Loan Guarantee assisted activities in accordance with federal regulations. The Consolidated Annual Performance and Evaluation Report (CAPER) shall be completed within ninety (90) days of the end of each program year and made available to all interested persons prior to submission to HUD.

These performance reports provide information on the program's progress for all funded activities, status of fund expenditures, number of persons benefiting, the housing assistance provided, in relationship to the City's objectives. Citizen comments are solicited by the City for HUD on this report for a period of at least fifteen (15) days.

The Annual Action Plan will be made available for public review in the Department of Urban Redevelopment from 8:00 A.M. until 5:00 P.M., Monday through Friday. The Action Plan is due to HUD annually by August 15. This plan is reviewed during its inception by two separate public hearings to devise the actions that will be included in the plan. Citizens will be notified that these reports are available for review by means of advertisements in the non-legal section of a local newspaper, and public comments will be received by the Department of Urban Redevelopment.

## **VIII. 5-YEAR ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)**

The following describes the process and procedures related to the development of the Five-Year Analysis of Impediments (AI) to Fair Housing Choice Report.

### **1. Plan Development**

The City shall follow the following procedures in the drafting and adoption of the 5-Year AI:

#### **a. Plan Considerations**

During the development of the 5-Year AI, the City will consult the following groups/agencies to solicit their input on fair housing issues in the City:

- Fair Housing Organizations
- Other local governments
- Advocacy groups for special needs households
- Affordable housing providers
- Banks and other financial institutions
- Educational institutions

A variety of mechanisms may be utilized to solicit input from these groups/agencies. These include telephone or personal interviews, surveys, and consultation workshops.

b. Plan Review and Comment

The draft AI shall be made available for public review for a 30-day period prior to City Commission consideration at a scheduled public hearing.

Written comments will be accepted during public review period by the Department of Urban Redevelopment.

A summary of the comments and the City's responses to the comments will be attached to the draft AI.

Copies including comments will be made available for citizen review.

c. Public Hearing

The City Commission shall conduct a public hearing to accept public comments on the draft AI as part of the approval of the 5-Year Consolidated Plan. After public comments are heard and considered by the City Commission, the City Commission shall approve or reject the AI.

Section IV, Opportunities for Participation, describes the process for publishing notice for and conducting public hearings.

d. Submittal to HUD

Upon adoption of the AI pursuant to HUD regulations, AI shall be incorporated into the 5-Year Consolidated Plan and submitted along with the Consolidated Plan to HUD for approval.

## **2. Plan Access and Comments**

The approved AI will be kept on file by the City at the Department of Urban Redevelopment, and will be accessible online at:

<http://cityoffortpierce.com/399/Community-Development-Block-Grant-CDBG>. The Plan will be made available to those requesting a copy by contacting:

City of Fort Pierce

Department of Urban Redevelopment

100 North U.S. Hwy. 1

Fort Pierce, Florida 34950

Telephone: 772-467-3183 ~ Email: [kmike@city-ftpierce.com](mailto:kmike@city-ftpierce.com)

## **IX. PLAN AMENDMENTS**

The level of citizens' participation activities will vary with the scope of the amendment. If the amendment involves a budget change exceeding thirty (30) percent of the annual program budget, and/or changes funding from one eligible activity to another that has not been previously approved by the City Commission, the City shall conduct a public hearing on the amendment and publish the proposed amendment in a local newspaper. The Department of Urban Redevelopment will respond in writing to citizen comments, requests and/or complaints within fifteen (15) working days where practicable. A summary of comments received will be attached to substantial amendments. A thirty (30) day comment period will be allowed before the amendment is implemented.

For any other amendments not mentioned in the above guidelines, the City Commission may take final action upon request or delegate authorization to the City Manager to amend the CDBG grant and/or Section 108 Loan Guarantee budget.

## **X. TECHNICAL ASSISTANCE**

The Department of Urban Redevelopment provides support for all activities. Technical assistance related to participation in the CDBG and Section 108 Loan Guarantee program is available to any interested party during every step of the process. Staff is ready to explain the CDBG and Section 108 Loan Guarantee programs in more detail, review project eligibility, assist with proposal development, and provide information on activities funded in the present or past years. This assistance is available Monday through Friday, 8:00 A.M. to 5:00 P.M., at the Department of Urban Redevelopment, second floor, City Hall. Staff can be reached by phone at 772-467-3183 during these hours.

## **XI. COMMUNITYWIDE COUNCIL (ADVISORY BOARD)**

The City desires to encourage participation of its citizens, especially low and moderate-income residents, in developing and implementing Community Development programs.

**Members:** The Communitywide Council shall consist of seven (7) regular voting members and up to four (4) alternate members, to be appointed by the City Commission. The regular voting members will consist of four (4) persons of low or moderate income from the CDBG target area and will be residents of federally assisted housing, representatives of community organizations or otherwise eligible for participation in the CDBG program and three (3) members of the community at large. The alternate members shall consist of two persons from each group described above and shall have no voting powers, except to fill the seat of an absent regular voting member and vote in their stead, as required and as defined in City Resolution 10-54.

This will ensure continued involvement of citizens and citizen organizations throughout all stages of the program. All members shall be appointed to serve a two (2) year term. No member shall serve more than two (2) consecutive terms.

**Meetings:** Meetings of the Communitywide Council shall be held on the second (2<sup>nd</sup>) Wednesday of the month beginning at 6:00 p.m. in the second floor conference room at City Hall. Meetings shall be held monthly, at least six (6) times each fiscal year.

**Responsibilities:** The Communitywide Council responsibilities include the review of the City's Community Development Block Grant (CDBG) Program 5-Year Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER), economic development business loan applications, non-profit organizations' grant applications requesting funding, and projects proposed by citizens for staff and City Commission consideration. Additionally, the Communitywide Council will be tasked with the review of citizen complaints with issues surrounding the various programs funded through the CDBG and SHIP programs and assist staff in dealing effectively with individual concerns.

Further, as the City addresses brownfield issues, the Council will provide public review and input on cleanup plans for a variety of projects. The Communitywide Council's areas of interest have been enlarged under the guidance of the new Department of Urban Redevelopment and the Department welcomes comments and suggestions from the public, through the Communitywide Council.

At the November 9, 2011 Communitywide Council meeting, the Council agreed to serve the City as the State Housing Initiatives Partnership (SHIP) Affordable Housing Action Committee (AHAC). The primary responsibility of the AHAC is to review and assist in the drafting of the State Housing Initiatives Partnership (SHIP) Local Housing Assistance Plan (LHAP) by providing a venue for public review and comment

during their regularly-scheduled meetings. The LHAP is updated once every three years and submitted to the State for review and approval.

## **XII. CITIZEN COMPLAINTS**

Citizens who wish to register a complaint about any CDBG, SHIP or Section 108 Loan Guarantee program activity may do so by writing the Department of Urban Redevelopment, at the following address:

City of Fort Pierce  
Department of Urban Redevelopment  
100 N. U.S. Highway #1  
Fort Pierce, FL 34950  
(772) 467-3183

Every effort will be made to provide written responses to complaints within fifteen (15) days. If the information requested cannot be provided by this office, if the City's response is not adequate, or if persons wish to object to approval of an application, citizens may contact the HUD Jacksonville, Florida area office at the address below:

U. S. Department of Housing and Urban Development  
Office of Community Planning and Development  
Charles Bennett Federal Building  
400 W. Bay Street, Suite 1015  
Jacksonville, FL 32202  
(904)-232-1777

HUD will consider objections made for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with the available facts and data;
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; or
- The application does not comply with the requirements or applicable law; or
- The application proposed activities which are otherwise ineligible.

Such objections should include both an identification of the requirements not met and the data upon which the persons rely. Although HUD will consider objections submitted at any time, such objections should be submitted within thirty (30) days of the publication of the notice that the application has been submitted to HUD. In order to insure that objections submitted will be considered during the review process, HUD will not approve an application until at least forty-five (45) days after receipt of an application.

## **XIII. CERTIFICATIONS**

The City of Fort Pierce shall submit certifications to HUD each program year in accordance with the Housing and Community Development Act of 1974, as amended, and the Housing and Community Development (HCD) Act of 1987.

## **XIV. EFFECTIVITY**

This amended Plan shall be effective **May 16, 2016**; all provisions concerning citizen involvement in implementing and assisting the program apply to activities that are ongoing as of this date, as well as to all future activities. This Plan shall remain in effect until all Community Development Block Grant or Section 108 Loan Guarantee activities are completed, or until a new Citizens Participation Plan supersedes it.