









Pinellas County, Florida 2020 Analysis of Impediments to Fair Housing Choice

Prepared for: Pinellas County, Florida

In partnership with: City Clearwater, Florida City of Largo, Florida City of St. Petersburg, Florida.

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Table of Contents

NTRODUCTION	5
EXECUTIVE SUMMARY	6
Section I: Community Profile - Demographic and Socioeconomic Characteristics	19
Population	19
Age	20
Racial and Ethnic Composition	23
Nativity and Language	30
Households and Families	33
Disability	41
Veterans	45
Education	45
Income	49
Poverty	57
Employment and Unemployment	58
Employment by Industry	63
Largest Employers in Pinellas County	66
Transportation	66
Section II: Housing Profile	69
Housing Characteristics	69
Occupied Housing Units	71
Housing Costs	72
Housing Cost by Location	75
Housing Affordability for Renters	77
Housing Affordability for Homeowners	77
Family Sized Housing Needs	79
Housing and Transportation Cost Burden	88
Housing Authorities, Subsidized Housing Policy, and Subsidized Low-Income Housing	88
Tax Exemption Analysis	91

DRAFT 04/22/2020

Zoning Laws and Policies	93
Section III: Evaluation of Fair Housing Legal Status	96
Enforcement and Litigation	96
Pinellas County-Tampa MSA Foreclosures	101
Section IV: Community Outreach and Engagement	102
Section V: Impediments to Fair Housing	104
Actions to Address Previous Found Impediments	104
Impediment: Areas of Discrimination	104
Impediment: Areas of Limited Opportunity	106
Impediment: Condition of Housing Stock	108
Revitalization Areas in Pinellas County	110
Community Reinvestment Act	111
Home Mortgage Disclosure Act (HMDA)	112
Fair Housing Index	131
Impediments to Fair Housing and Recommendations	134
Appendix	141

INTRODUCTION

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

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

Additionally, the Consolidated Plans for housing and community development in Pinellas County, City of Clearwater, City of Largo, and the City of St. Petersburg, Florida, contain a certification to affirmatively further fair housing requiring the jurisdictions to conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard. The Analysis of Impediments (AI) presented herein is in conjunction with the Pinellas County Consortium (Pinellas County and City of Largo) fiscal years 2020-2024 Consolidated Plan (ending September 30, 2025), the City of Clearwater, Florida 2020-2024 Consolidated Plan, and the City of St. Petersburg, Florida 2020-2024 Consolidated Plan. The research and preparation of the Analysis of Impediments to Fair Housing Choice was funded with federal and local government funds.

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

EXECUTIVE SUMMARY

Evaluating fair housing impediments is a complex process involving diverse and wide-ranging considerations. The role of economics, housing patterns, and personal choice are important to consider when examining fair housing choice.

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

Community Profiles

Pinellas County

According to the 2014-2018 American Community Survey (ACS) population estimates, the total countywide population of Pinellas County was estimated to be 957,875. Between 2014 (pop. 925,030) and 2018, the total population of the County increased by 3.6 percent. According to the medium population projection provided by the Bureau of Economic and Business Research (BEBR), the total population of the County will further increase to 1,014,400 by 2025. According to the 2014-2018 ACS, the percentage of White population in the County was 81.7 percent, African American population was 10.3 percent, and Hispanic population was 9.4 percent.

When considering all family types with children present, the data indicate that 69.6 percent of all White households, 15.2 percent of all African American households, 0.2 percent of all American Indian and Alaska Native households and Native Hawaiian and Other Pacific Islander households, 3.6 percent of Asian households, 1.9 percent of all Some other race households, 9.3 percent of all Two or more races households, and 15.8 percent of all Hispanic households were in this household type. White non-family households made up 45.1 percent of all White households in Pinellas County. African American non-family households accounted for 42.2 percent of all African American households. Hispanic non-family households accounted for 35.6 percent of all Hispanic households.

Overall, the income distribution data show a higher proportion of low-income households within African American communities and among those who identify as "Two or more races". In general, limitations on fair housing choice more commonly affect housing decisions among low-income persons. Poverty among African American persons was 26.4 percent of the total population for whom poverty status was determined, persons identifying as "Two or more races" was 18.3 percent, Hispanic persons was 17.4 percent of the population, and White persons was 11.2 percent of the population. In comparison, the poverty rate for Pinellas County overall was 11.6 percent.

The distribution of the unemployed in Pinellas County indicates that African American population and those who identify as "Two or more races" experience higher unemployment rates. In the 2014-2018 American Community Survey, 5.2 percent of White persons age 16 and over reported being unemployed. African American persons in the same group reported a 9.1 percent unemployment rate,

those who identify as "Two or more races" reported a 9.0 percent unemployment rate, and Hispanic persons reported a 6.6 percent unemployment rate.

Clearwater

According to the 2014-2018 American Community Survey (ACS) population estimates, the population of Clearwater was estimated to be 114,015. Between 2014 (pop. 109,210) and 2018, the total population of Clearwater increased by 4.4 percent. According to the 2014-2018 ACS the percentage of White population in Clearwater was 79.4 percent, African American population was 11.5 percent, and Hispanic population was 17.8 percent.

When considering all family types with children present, the data indicate that 65.5 percent of all White households, 16.4 percent of all African American households, 0.5 percent of all American Indian and Alaska Native households, 1.8 percent of Asian households, 0.4 percent of all Native Hawaiian and Other Pacific Islander households, 3.8 percent of all Some other race households, 11.6 percent of all Two or more races households, and 30.1 percent of all Hispanic households were in this household type. White non-family households made up 44.5 percent of all White households in Clearwater. African Americans non-family households accounted for 43.7 percent of all African American households. Hispanic non-family households accounted for 29.1 percent of all Hispanic households.

Overall, the income distribution data shows a higher proportion of low-income households within Asian population and those who identify as "Two or more races". In general, limitations on fair housing choice more commonly affect housing decisions among low-income persons. Poverty among those who identify as "Two or more races" was 27.7 percent of the total population for whom a poverty status was determined, Asian persons was 25.5 percent of the population, and White persons was 13.8 percent of the population. In comparison, the poverty rate for Clearwater overall was 15.9 percent.

The distribution of the unemployed in Clearwater indicates that Native Hawaiian and Other Pacific Islander and African American populations experience higher unemployment rates. In the 2014-2018 American Community Survey, 5.7 percent of White persons age 16 and over reported being unemployed. Native Hawaiian and Other Pacific Islander persons in the same group reported a 16.2 percent unemployment rate, African American persons reported a 12.4 percent unemployment rate, and those who identify with "Two or more races" reported a 12.3 percent unemployment rate.

Largo

According to the 2014-2018 American Community Survey (ACS) population estimates, the population of Largo was estimated to be 83,243. Between 2014 (pop. 78,391) and 2018, the total population of Largo increased by 6.2 percent. According to the 2014-2018 ACS the percentage of White population in Largo was 87.5 percent, African American population was 5.5 percent, and Hispanic population was 11.3 percent.

When considering all family types with children present, the data indicate that 54.1 percent of all White households, 31.0 percent of all African American households, 0.1 percent of all American Indian and Alaska Native households, 3.7 percent of Asian households, 1.7 percent of all Some other race

households, 9.4 percent of all Two or more races households, and 11.1 percent of all Hispanic households were in this household type. White non-family households made up 48.6 percent of all White households in Largo. African American non-family households accounted for 41.4 percent of all African American households. Hispanic non-family households accounted for 43.5 percent of all Hispanic households.

Overall, the income distribution data show a higher proportion of low-income households within the American Indian and Alaska Native alone and Hispanic populations. In general, limitations on fair housing choice more commonly affect housing decisions among low-income persons. Poverty among American Indian and Alaska Native persons was 28.7 percent of the total population for whom a poverty status was determined, Hispanic persons was 16.9 percent of the population, and White persons was 12.0 percent of the population. In comparison, the poverty rate for Largo overall was 13.2 percent.

The distribution of the unemployed in Largo indicates that African American and Asian populations experience higher rates of unemployment. In the 2014-2018 American Community Survey, 6.2 percent of White persons age 16 and over reported being unemployed. African Americans in the same group reported an 8.2 percent unemployment rate and Asians reported a 6.5 percent unemployment rate.

St. Petersburg

According to the 2014-2018 American Community Survey (ACS) population estimates, the population of St. Petersburg was estimated to be 259,041. Between 2014 (pop. 248,429) and 2018, the total population of Largo increased by 4.3 percent. According to the 2014-2018 ACS the percentage of White population in Largo was 68.8 percent, African American population was 22.6 percent, and Hispanic population was 7.9 percent.

When considering all family types with children present, the data indicates that 54.1 percent of all White households, 31.0 percent of all African American households, 0.1 percent of all American Indian and Alaska Native households, 3.7 percent of Asian households, 1.7 percent of all Some other race households, 9.4 percent of all Two or more races households, and 11.1 percent of all Hispanic households were in this household type. White non-family households made up 48.6 percent of all White households in St. Petersburg. African American non-family households accounted for 41.4 percent of all African American households. Hispanic non-family households accounted for 43.5 percent of all Hispanic households.

Overall, the income distribution data show a higher proportion of low-income households within the African American and Hispanic populations. In general, limitations on fair housing choice more commonly affect housing decisions among low-income persons. Poverty among African American persons was 26.7 percent of the total population for whom a poverty status was determined, Hispanic persons was 14.6 percent of the population, and White persons was 11.0 percent of the population. In comparison, the poverty rate for St. Petersburg overall was 14.9 percent.

The distribution of the unemployed in St. Petersburg indicates that the African American population and those who identify as "Two or more races" experience higher rates of unemployment. In the 2014-

2018 American Community Survey, 4.5 percent of White persons age 16 and over reported being unemployed. Those who identify as "Two or more races" in the same group reported a 10.0 percent unemployment rate, African American persons reported an 8.0 percent unemployment rate, and Asians reported a 7.6 percent unemployment rate.

Housing Profile

Pinellas County

Fair housing choice can be influenced by the housing market. In 2014, there were 503,428 housing units in Pinellas County. In 2018, there were 503,658 housing units. Over the five years, the housing stock increased by only 230 housing units.

In 2018, the median monthly housing cost for mortgaged homeowners in Pinellas County was \$1,450, for non-mortgage owners, the median monthly housing cost was \$534, while for renters, the median monthly housing cost was \$1,064. Approximately, 36 percent (35.9 percent) of housing units in Pinellas County were considered cost-burdened.

Single-unit homes are the predominate housing structures in the County comprising of 53.2 percent of all housing units in the County. Mobile homes/other comprise the third largest (9.5 percent) component of housing within the County. Approximately 65.7 percent of the County's housing stock is owner occupied, which is high for a densely populated urban County. The average household size is fairly similar with the average size of ownership housing of 2.31 and average size of renter occupied housing of 2.30. Approximately 61.5 percent of the housing stock is comprised of units having 2 bedrooms or less. Approximately 10.1 percent of the housing units have 4 or more bedrooms.

Comparisons of 2014 and 2018 ACS data indicates Pinellas County experienced a net increase of approximately 32,845 residents and a housing inventory increase of 230 units, while occupied housing increased by 5,184 units.

The County's housing stock is fairly old with only 8.1 percent housing being built since 2000, while the majority of the housing stock (27.5 percent) was built from 1970 to 1979. Approximately 4 percent (3.8 percent) of housing dates back to 1939 or earlier. The housing stock, as a result of age, is becoming functionally obsolete in terms of layout, size, insulation, energy efficiency and electrical connectivity with limited room outlets that may require updating or replacement. Overall, due to the age of housing stock, it may not be economically viable to renovate some units. Therefore, some of these owner-occupied homes may revert to lower priced rental housing with high maintenance and utility costs that could continue to decline and contribute to slum and blight within the county.

Clearwater

In 2014, there were 60,605 housing units in Clearwater. In 2018, there were 58,103 housing units. Over the five years, the housing stock decreased by 2,502 housing units.

In 2018, the median monthly housing cost for mortgaged homeowners in Clearwater was \$1,457, for non-mortgage owners, the median monthly housing cost was \$588, while for renters, the median monthly housing cost was \$1,052. Approximately 41 percent (40.9 percent) of housing units in Clearwater were considered cost-burdened.

Multi-unit homes are the predominate housing structures in Clearwater comprising of 43.6 percent of all housing units in the City. Mobile homes/other comprise the third largest (5.9 percent) component of housing within the City. Approximately 57.9 percent of the Clearwater's housing stock is owner occupied. The average household size differs slightly with the average size of ownership housing of 2.36 and average size of renter occupied housing of 2.45. Approximately 63.6 percent of the housing stock is comprised of units having 2 bedrooms or less. Approximately 9.4 percent of the housing units have 4 or more bedrooms.

Comparisons of 2014 and 2018 ACS data indicates Clearwater experienced a net increase of approximately 4,805 residents and a housing inventory decrease of 2,502 units, while occupied housing decreased by 348 units.

Clearwater's housing stock is fairly old with only 7.2 percent housing being built since 2000, while the majority of the housing stock (29.4 percent) was built from 1970 to 1979. Approximately 3 percent (2.6 percent) of housing dates back to 1939 or earlier.

Largo

In 2014, there were 45,661 housing units in Largo. In 2018, there were 46,927 housing units. Over the five years, the housing stock increased by 1,266 housing units.

In 2018, the median monthly housing cost for mortgaged homeowners in Largo was \$1,296, for non-mortgage owners, the median monthly housing cost was \$504, while for renters, the median monthly housing cost was \$1,019. Approximately 39 percent (38.7 percent) of housing units in Largo were considered cost-burdened.

Multi-unit homes are the predominate housing structures in Largo comprising of 39.1 percent of all housing units in the City. Mobile homes/other comprise the third largest (26.3 percent) component of housing within the City. Approximately 56.7 percent of the Largo's housing stock is owner occupied. The average household size is fairly similar with the average size of ownership housing of 2.20 and average size of renter occupied housing of 2.22. Approximately 73.3 percent of the housing stock is comprised of units having 2 bedrooms or less. Approximately 6.4 percent of the housing units have 4 or more bedrooms.

Comparisons of 2014 and 2018 ACS data indicates Largo experienced a net increase of approximately 4,852 residents and a housing inventory increase of 1,266 units, while occupied housing increased by 1,644 units.

Largo's housing stock is fairly old with only 7.8 percent housing being built since 2000, while the majority of the housing stock (43.1 percent) was built from 1970 to 1979. Approximately 1 percent (1.3

percent) of housing dates back to 1939 or earlier.

St. Petersburg

In 2014, there were 127,814 housing units in St. Petersburg. In 2018, there were 132,622 housing units. Over the five years, the housing stock increased by 4,808 housing units.

In 2018, the median monthly housing cost for mortgaged homeowners in St. Petersburg was \$1,415, for non-mortgage owners, the median monthly housing cost was \$496, while for renters, the median monthly housing cost was \$1,067. Approximately 36 percent (36.1 percent) of housing units in St. Petersburg were considered cost-burdened.

Single-unit homes are the predominate housing structures in St. Petersburg comprising of 58.6 percent of all housing units in the City. Mobile homes/other comprise the third largest (3.2 percent) component of housing within the City. Approximately 58.8 percent of the St. Petersburg's housing stock is owner occupied which is high for a densely populated urban County. The average household size differs slightly with the average size of ownership housing of 2.42 and average size of renter occupied housing of 2.28. Approximately 61.0 percent of the housing stock is comprised of units having 2 bedrooms or less. Approximately 9.1 percent of the housing units have 4 or more bedrooms.

Comparisons of 2014 and 2018 ACS data indicates St. Petersburg experienced a net increase of approximately 10,612 residents and a housing inventory increase of 4,808 units, while occupied housing increased by 2,102 units.

St. Petersburg's housing stock is fairly old with only 8.9 percent housing being built since 2000, while the majority of the housing stock (20.3 percent) was built from 1970 to 1979. Approximately 10 percent (9.6 percent) of housing dates back to 1939 or earlier. Over 50 percent (54.2 percent) of the housing stock in St. Petersburg was built before 1970.

Evaluation of Jurisdiction's Current Fair Housing Legal Status

Pinellas County, the City of Clearwater, the City of Largo, and the City of St. Petersburg are compliant with Fair Housing requirements and have all certified that they affirm, support, and enforce Fair Housing Choice. Each jurisdiction has adopted the updated Analysis of Impediments to Fair Housing Choice Study and take actions each year to address impediments as reported in their respected Consolidated Annual Performance Reports (CAPERs).

The Pinellas County Office of Human Rights (PCOHR) is an agency that operates within the unincorporated areas of the County and within the County's municipalities. PCOHR is staffed with full time employees that receive, investigate, and resolve Fair Housing complaints. PCOHR is a substantially equivalent agency that is authorized on behalf of HUD to enforce federal, state and local Fair Housing laws (Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended, State of Florida Civil Rights Act (ss. 760.01-760.11) and the Fair Housing Act (ss. 760-20-760.37), and Pinellas County (Chapter 70, Section 103, of the Pinellas County Code)).

In addition to investigating complaints, PCOHR also provides outreach and education in cooperation with Pinellas County, the City of Clearwater, the City of Largo, and the City of St. Petersburg. PCOHR provides continuous outreach and education to real estate professionals, bankers, lenders, property managers, and the public.

Pinellas County and its jurisdictions also supports the Tampa Bay Fair Housing Consortium, which also provides education and outreach for the entire metropolitan area.

Enforcement and Litigation

The Pinellas County Office of Human Rights (PCOHR) works with residents, landlords, property managers, real estate professionals, and the community at large to provide fair housing education and, if necessary, enforcement of fair housing laws. PCOHR is funded through the County and operates in unincorporated areas of the County and in all incorporated municipalities in the County.

PCOHR actively collects data on enforcement activity. Residents of Pinellas County with fair housing issues file a complaint with PCOHR, which logs the complaint and opens an investigation. The results of the investigation may lead to dismissal, a negotiated settlement, or prosecution.

Data from the last four years indicate several stark statistics. Complainants may select multiple categories of complaints, so the total of 400 bases of complaints does not represent 400 unique cases. Under "Bases for Complaints", a large proportion, 55 percent, is related to disability. The second highest category is race, at 23 percent of complaints. The most common alleged issues cited were differences in terms and conditions (unequal treatment) and failure to provide reasonable accommodation/modification, at 37 percent and 28 percent, respectively. As with the bases for complaints, complainants may identify multiple alleged issues, so the total number of alleged issues does not reflect the total number of cases.

The largest share of complaints is based on disability. It is often assumed that disability complaints concern modifications to rental units for reasonable accommodation (handicap ramps, grab bars, etc.). However, within the category of disability complaints in Pinellas County, most center on service animals. It is of such concern that education about reasonable accommodation for service animals was identified as a fair housing strategy in the prior Impediments to Fair Housing Choice Study, as it will be in this study. Educating landlords about service animals is among the most pressing needs based on the case load reports of PCOHR. The County hopes that continued fair housing education will alleviate these cases before they get to the point of a complaint.

Race is the next highest category of complaints at 91 over a four-year period. As with disability, the County will continue to identify race-based discrimination as an impediment to fair housing choice.

Resolution of Complaints

PCOHR resolved a number of fair housing complaints over the last four years. Sixty-eight (68) percent of complaints over a four-year period were conciliated (mutual agreement on resolution of the complaint). Settlements were achieved in 28 percent of cases. In rare cases, the matter is escalated by HUD or submitted to administrative law proceedings. These actions represent about 4 percent of all cases.

Funding

Pinellas County receives Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Shelter Grant (ESG) entitlement allocations, as well as allocations from the Florida State Housing Initiative Partnership (SHIP) Program. In 2020, the expected resources for these programs are as follows:

CDBG:	\$2,519,210
HOME:	\$1,327,770
ESG:	\$ 214,344
SHIP:	\$2,141,346
TOTAL FY 2020:	\$6,202,670

Over five years, the total amount expected from these programs is approximately \$30 million, not including other local sources of funding. Program income from all of these resources will increase the total amount of funds available.

Community Outreach and Engagement

Four (4) fair housing forums with residents were held on the following dates: October 29, 2019, at the Lealman Exchange (5175 45th St. N., St. Petersburg, FL), on November 4, 2019, at the Largo Public Library (120 Central Park Dr., Largo, FL), on November 12, 2019 at the Tarpon Springs Public Library (138 E. Lemon St., Tarpon Springs, FL), and on March 3, 2020 at the St. Petersburg Main Library (3745 9th Ave. N., St. Petersburg, FL). Additionally, one housing focus group meeting was held on November 4, 2019, at the Largo Public Library (120 Central Park Dr., Largo, FL). Participants in the focus group meeting included staff from the cities and County, including the City of Largo Housing Division, Pinellas County Office of Human Rights, a YMCA representative, and the general public. Surveys (online and paper) were available to the attendees during the community outreach campaign in October and November 2019.

Discussion in the fair housing focus group meetings spanned numerous issues, but the following issues were voiced repeatedly:

- Persons with support animals are discriminated against in housing that does not allow animals.
- Persons with criminal records are often discriminated against and have very limited, if any, options for housing.
- Persons fleeing domestic violence have limited options for removing their financial

- responsibility related to the housing they left behind.
- There needs to be better education and "testing" about Fair Housing among rental property landlords, adult communities (e.g. 55+), and condo and homeowner's associations, as well as resources for people in need of housing assistance
- Eviction needs to be addressed, particularly regarding Fair Housing issues.
- Strategies such as ordinances are needed to expedite and improve acceptance of other sources
 of income (e.g. vouchers) for housing.
- Families, particularly single-parent families, struggle to find affordable housing because larger housing units are more expensive, and many families do not meet the minimum family size requirements to afford such units.
- The lack of availability of land is a major obstacle for increasing housing inventory in Pinellas County.
- Diversity of housing options (e.g. accessory dwelling units, quadplex, etc.) within existing neighborhoods is needed to discourage flipping, reduce concentrations of lower income units, and improve price range/affordability.
- More funding and subsidies are needed to make affordable housing realistic.
- Collaboration between entities is needed to streamline the process and standards for affordable housing.

Community Reinvestment Act

The Community Reinvestment Act (CRA) is a 1977 law that requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low-and moderate-income (LMI) neighborhoods. Pinellas County and the incorporated cities coordinate with CRA banking institutions to help these lending institutions meet their obligations under the CRA.

Home Mortgage Disclosure Act

One of the data sources reviewed for the Impediments to Fair Housing Choice analysis is derived from the Home Mortgage Disclosure Act (HMDA) data. The act was passed by Congress in 1975 because of concerns that urban areas were being starved of bank financing. HMDA requires financial institutions to maintain, report, and publicly disclose detailed loan-level information about mortgages. HMDA enforcement and data collection resides under the Consumer Financial Protections Bureau.

Data from the reporting institutions is correlated with census data to discern patterns of lending in every community in America. The census data in the HMDA database is organized by Census Tracts, Counties, MSAs (Metropolitan Standard Areas), and states. Summary queries are organized by MSAs. HMDA data do not distinguish municipal boundaries because such boundaries often cross census tracts and frequently change.

A review of HMDA data for Pinellas County reveals some important points. As indicated earlier, HMDA data does not, by itself, reveal patterns of discrimination. Like the warning light on the dash of a car, HMDA data can draw attention to potential trouble areas. Here are the primary takeaways from this

analysis:

<u>Race</u>: Race is a persistent concern in lending. Although the rate of loan originations for African Americans has improved since the last impediments study, the rate remains well below the rate of approvals for White applicants, 59 percent and 73 percent, respectively.

<u>Volume:</u> The rate of African American applicants is well below their numbers in the population. While 10 percent of the County is African American, only four (4) percent were mortgage applicants (approved or denied completed applications).

<u>Census Tracts with Low Levels of Loan Originations:</u> There are eight (8) census tracts in Pinellas County that have loan origination rates below 50 percent.

Rates of loan origination based on sex and ethnicity appear to be in line with expected results. County residents take advantage of the various types of housing financing available to them, with conventional financing being the most widely utilized.

Fair Housing Index

This section provides a list of the 21 census tracts at high risk in the fair housing index. Specifically, these census tracts have indexes higher than four (4) for six (6) at-risk factors: Race, Ethnicity, Disability, Female Head of Household, Loan Origination, and Low-Income Households. Several of them are within designated target areas, including Pinellas County's Tarpon Springs Target Area; City of Clearwater's North Greenwood Target Area, Pinellas County's High Point Target Area; and Pinellas County's Central Lealman Target Area.

These census tracts have a high number of risk factors for impediments to fair housing choice, including race, familial status, and disability. Access to housing in these areas should be closely monitored for possible impediments to fair housing choice.

Impediments to Fair Housing and Recommendations

Based on the results of the impediments study, the following are impediments to fair housing choice in Pinellas County:

Impediment 1: Cost and Availability

The cost and availability of housing is an impediment to fair housing choice.

Actions:

 Continue to fund programs using local, state and federal resources to provide housing opportunities to residents through the creation of new housing, the rehabilitation of existing housing, acquisition of housing, and housing financing (mortgage assistance, developer financing, etc.).

- Encourage landlords and local housing agencies to develop strategies to deploy Section 8 vouchers to more properties across Pinellas County.
- Allocate resources countywide according to need, paying particular attention to census tracts with high concentrations of minority residents.
- Continue to work with non-profits, educators, and hiring professionals to ensure job readiness and training providers sponsor educational classes and job fairs in African American communities.
- Continue to advocate and partner with developers to entice businesses to the area that provide
 new employment opportunities that match educational levels of the community. Continue to
 ensure that all vendors and contractors and employees paid with state and federal funds are
 contractually obligated to affirmatively assure that minority business and women's business
 enterprises have an equal opportunity to compete for contracts, subcontracts, sources of
 supplies, equipment, construction and services.
- Continue to ensure that all project sponsors, vendors and contractors assure equal employment opportunity to all persons regardless of race, color, national origin, sex or disability for federallyfunded subrecipients.

Impediment 2: Evictions

Evictions are an impediment to fair housing choice.

Actions:

- Review and follow up with the Pinellas County Homeless Leadership Alliance regarding the study being commissioned in 2020 to determine the causes of disproportionate homelessness among African Americans.
- Encourage municipalities to review local ordinances and, where possible, assist with the enforcement of tenant's rights.

Impediment 3: Housing Stock

The housing stock is an impediment to fair housing.

Actions:

 Continue to provide assistance to low income families to modify existing housing stock through renovations.

- Provide incentives to developers, CHDOs, and housing providers to create new housing for eligible residents, with particular emphasis on accessibility and equal housing opportunity for everyone.
- Continue to ensure that all project sponsors, vendors and contractors assure equal employment opportunity to all persons regardless of race, color, national origin, sex or disability for federallyfunded subrecipients.

Impediment 4: Protected Classes

Discrimination against protected classes is an impediment to fair housing.

Actions:

- Conduct at least one test of fair housing and lending practices compliance in Pinellas County.
- Continue to support the Pinellas County Council for Persons with Disabilities.
- Continue to support the Pinellas County Office of Human Rights in enforcement activities such as collecting and investigating fair housing complaints.

Impediment 5: Education

A lack of education is an impediment fair housing choice.

Actions:

- Continue to allocate resources to publicize fair housing in social media, advertisements and brochures.
- Continue to support the ongoing efforts of the Pinellas County Office of Human Rights to enforce and educate the public about fair housing policy, especially with regards to service animals and reasonable accommodation.
- Continue to support the ongoing efforts of the Pinellas County Office of Human Rights to enforce and educate the public about fair housing policy with special emphasis on the protected classes.

Impediment 6: Underserved Transportation Corridors

Underserved transportations corridors are an impediment to fair housing choice.

Actions:

Review local ordinances and develop policies and procedures to prioritize the development of

housing opportunities along major transportation corridors.

• Coordinate with the Pinellas Suncoast Transit Authority to provide enhanced access between areas of employment and housing.

Impediment 7: Limited English Proficiency (LEP)

Limited English Proficiency (LEP) is an impediment to fair housing.

Actions

- Provide all housing program materials in other languages as requested, with particular emphasis on Spanish. Other languages will be provided upon request.
- Continue to offer homebuyer classes and counseling in Spanish.
- Continue to ensure that all Fair Housing marketing plans and publications contain information in Spanish advising persons of their rights under the Fair Housing Act.
- Provide fair housing information and published materials in other languages such as Vietnamese with reasonable notification of the need for such materials.

Section I: Community Profile - Demographic and Socioeconomic Characteristics

The background data for Pinellas County and the participating jurisdictions of the cities of Clearwater, Largo, and St. Petersburg serve as tools to provide context for the analysis of impediments to fair housing. As outlined further in this Study, the background data is often a factor in identifying the impediments. that have been identified. The housing profile section also reflects the issues associated with fair housing choice in Pinellas County and the participating jurisdictions of the cities of Clearwater, Largo, and St. Petersburg.

All attempts were made to utilize consistent data sources and date timelines. Data from such sources as the Home Mortgage Disclosure Act, Comprehensive Housing Affordability Strategy data, the 2010 Census, and the 2018 American Community Survey were utilized as available. The most recent data available was utilized; however, as the dates vary, some sections may reflect different time periods. Although, this affects the comparability between sections of this Report or visualizations, the data still serves as a valuable indicator of impediments to fair housing choice.

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

Population

Pinellas County

Pinellas County had a total population of 925,030 in 2014 and 957,875 in 2018 according to the 2014 and 2018 American Community Survey (ACS), respectively; both data sources indicate approximately 52 percent females and 48 percent males. The 2014 median age was 46.9 years and the 2018 median age was 47.8 years. In 2018, minors, or those under 18 years of age, represent 16.6 percent of the population while 23.9 percent was 65 years and older. These figures are below (under 18 years; 22.8 percent) and above (over 65 years; 15.2 percent) the national averages, respectively, which reflects the popularity of Pinellas County and Florida as retirement destinations.

Pinellas County is the second smallest County in the State by area; however, it is the most densely populated, with over 3,421 people per square mile. Although the population of Pinellas County has increased since 2014, it is at a much lower rate than that of Florida as a whole (Table 1).

Clearwater

Clearwater had a total population of 109,210 in 2014 and 114,015 in 2018 according to the 2014 and 2018 American Community Survey (ACS), respectively; both data sources indicate approximately 52 percent females and 48 percent males. The 2014 median age was 44.4 years and the 2018 median age was 44.4 years. In 2018, minors, or those under 18 years of age, represent 18.7 percent of the population while 21.9 percent was 65 years and older. These figures are below (under 18 years; 22.8 percent) and above (over 65 years; 15.2 percent) the national averages, respectively, which reflects the popularity of Clearwater and Florida as retirement destinations.

Largo

Largo had a total population of 78,391 in 2014 and 83,243 in 2018 according to the 2014 and 2018 American Community Survey (ACS), respectively; in 2014 the data source indicates approximately 52 percent females and 48 percent males and in 2018 the data source indicates approximately 53 percent females and 47 percent males. The 2014 median age was 47.2 years and the 2018 median age was 48.2 years. In 2018, minors, or those under 18 years of age, represent 15.9 percent of the population while 26.0 percent was 65 years and older. These figures are below (under 18 years; 22.8 percent) and above (over 65 years; 15.2 percent) the national averages, respectively, which reflects the popularity of Largo and Florida as retirement destinations.

St. Petersburg

St. Petersburg had a total population of 248,429 in 2014 and 259,041 in 2018 according to the 2014 and 2018 American Community Survey (ACS), respectively; both data sources indicate approximately 52 percent females and 48 percent males. The 2014 median age was 42.1 years and the 2018 median age was 42.5 years. In 2018, minors, or those under 18 years of age, represent 17.6 percent of the population while 18.0 percent was 65 years and older. These figures are below (under 18 years; 22.8 percent) and above (over 65 years; 15.2 percent) the national averages, respectively, which reflects the popularity of St. Petersburg and Florida as retirement destinations.

Table 1: Population Change 2014-2018

	Florida	Pinellas County	Clearwater	Largo	St. Petersburg
Population 2014	19,361,792	925,030	109,210	78,391	248,429
Population 2018	20,598,139	957,875	114,015	83,243	259,041
Percent change	6.4%	3.6%	4.4%	6.2%	4.3%

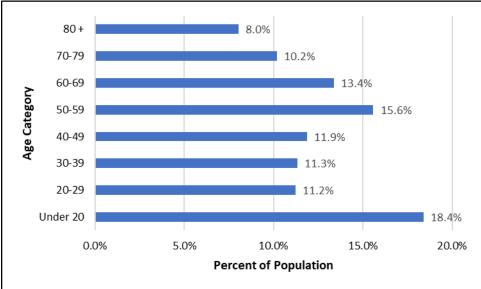
Source: US Census Bureau, 2010-2014 and 2014-2018, 5-Year American Community Survey

Age

Pinellas County

Pinellas County's age distribution is shown in Chart 1, below. Although those under 20 years of age make up the single largest group, the group also encompasses the largest age distribution. Most notably, almost half (47.2 percent) of the population is 50 years of age or older. This age distribution implies that as baby boomers age into retirement, the already heavily weighted older population will need additional housing options that meet the needs of retirees.

Chart 1: Pinellas County Age Distribution

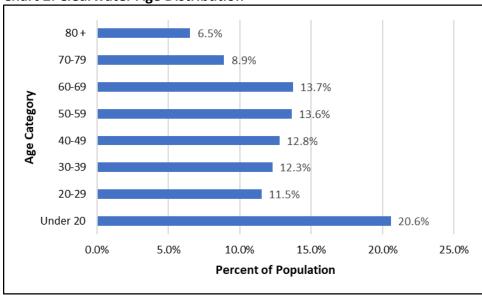


Source: US Census Bureau, 2014-2018, 5-Year American Community Survey

Clearwater

Clearwater's age distribution is shown in Chart 2, below. Although those under 20 years of age make up the single largest group, the group also encompasses the largest age distribution. Most notably, almost half (42.8 percent) of the population is 50 years of age or older. This age distribution implies that as baby boomers age into retirement, the already heavily weighted older population will need additional housing options that meet the needs of retirees.

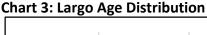
Chart 2: Clearwater Age Distribution

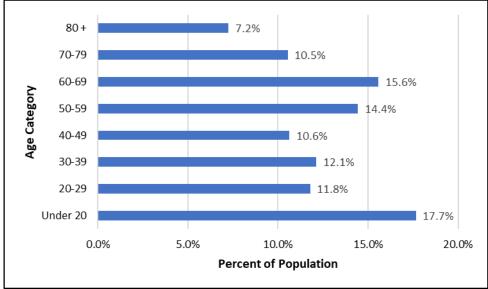


Source: US Census Bureau, 2014-2018, 5-Year American Community Survey

Largo

Pinellas County's age distribution is shown in Chart 3, below. Although those under 20 years of age make up the single largest group, the group also encompasses the largest age distribution. Most notably, almost half (47.8 percent) of the population is 50 years of age or older. This age distribution implies that as baby boomers age into retirement, the already heavily weighted older population will need additional housing options that meet the needs of retirees.





Source: US Census Bureau, 2014-2018, 5-Year American Community Survey

St. Petersburg

Pinellas County's age distribution is shown in Chart 4, below. Although those under 20 years of age make up the single largest group, the group also encompasses the largest age distribution. Most notably, the 50-59 years of age or older group is only 4.1 percentage points smaller than the under 20 years of age group. This age distribution implies that as baby boomers age into retirement, the already heavily weighted older population will need additional housing options that meet the needs of retirees.

80+ 4.8% 70-79 60-69 12.3% Age Category 50-59 15.5% 40-49 11.4% 30-39 14.3% 20-29 15.0% Under 20 19.6% 0.0% 5.0% 10.0% 15.0% 20.0% 25.0% Percent of Population

Chart 4: St. Petersburg Age Distribution

Source: US Census Bureau, 2014-2018, 5-Year American Community Survey

Racial and Ethnic Composition

Pinellas County

The majority (97.1 percent) of Pinellas County residents identify as one race (2014-2018 ACS), which indicates a small increase from 2010-2014 ACS of those identifying with Two or more races (2.3 percent up to 2.9 percent). Those individuals who identify as White make up the majority of Pinellas County's population, at 81.7 percent; those identifying as African American make up the second largest racial group at 10.3 percent. The third largest racial group in the County is made up of individuals identifying as "Asian alone" at 3.3 percent.

A significant portion of the Pinellas County (9.4 percent) population identify as Hispanic or Latino origin. Table 2 outlines the overall racial demographics in the County while Table 3 outlines ethnicity.

Table 2: Pinellas County Race Composition

	Estimate	% of Total Population
Total:	957,875	
White	782,632	81.7%
African American	98,432	10.3%
American Indian and Alaska Native	2,693	0.3%
Asian	31,851	3.3%
Native Hawaiian and Other Pacific Islander	960	0.1%
Other Race	13,170	1.4%
Population of Two or more races	28,137	2.9%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Table 3: Pinellas County Ethnicity

	Estimate	% of Total Population
Total:	957,875	
Hispanic or Latino	867,516	90.6%
Not Hispanic or Latino	90,359	9.4%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Clearwater

The majority (96.4 percent) of Clearwater residents identify as one race (2014-2018 ACS), which indicates a significant increase from 2010-2014 ACS of those identifying with Two or more races (1.4 percent up to 3.7 percent). Those individuals who identify as White make up the majority of Clearwater's population, at 79.4 percent; those identifying as African American make up the second largest racial group at 11.5 percent. The third largest racial group in the County is made up of individuals identifying as "Two or more races" at 3.7 percent.

A significant portion of the Clearwater (17.8 percent) population identifies as Hispanic or Latino origin. Table 4 outlines the overall racial demographics in Clearwater while Table 5 outlines ethnicity.

Table 4: Clearwater Race Composition

	Estimate	% of Total Population
Total:	114,015	
White	90,557	79.4%
African American	13,095	11.5%
American Indian and Alaska Native	353	0.3%
Asian	2,739	2.4%
Native Hawaiian and Other Pacific Islander	151	0.1%
Other Race	2,962	2.6%
Population of Two or more races	4,158	3.7%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Table 5: Clearwater Ethnicity

	Estimate	% of Total Population
Total:	114,015	
Hispanic or Latino	93,741	82.2%
Not Hispanic or Latino	20,274	17.8%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Largo

The majority (97.3 percent) of Largo residents identify as one race (2014-2018 ACS) which indicates a significant increase from 2010-2014 ACS of those identifying with Two or more races (-0.2 percent up to 2.7 percent). Those individuals who identify as White make up the majority of Largo's population, at 87.5 percent; those identifying as African American make up the second largest racial group at 5.5 percent. The third largest racial group in the Largo is made up of individuals identifying as "Two or more races" at 2.7 percent.

A significant portion of the Largo (11.3 percent) population identifies as Hispanic or Latino origin. Table 6 outlines the overall racial demographics in Largo while Table 7 outlines ethnicity.

Table 6: Largo Race Composition

	Estimate	% of Total Population
Total:	83,243	
White	72,832	87.5%
African American	4,562	5.5%
American Indian and Alaska Native	322	0.4%
Asian	1,877	2.3%
Native Hawaiian and Other Pacific Islander	194	0.2%
Other Race	1,173	1.4%
Population of Two or more races	2,283	2.7%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Table 7: Largo Ethnicity

	Estimate	% of Total Population
Total:	83,243	
Hispanic or Latino	73,868	88.7%
Not Hispanic or Latino	9,375	11.3%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

St. Petersburg

The majority (96.7 percent) of St. Petersburg residents identify as one race (2014-2018 ACS) which indicates a significant increase from 2010-2014 of those identifying with Two or more races (0.8 percent up to 3.3 percent). Those individuals who identify as White make up the majority of St. Petersburg's population, at 68.8 percent; those identifying as African American make up the second largest racial group at 22.6 percent. The third largest racial group in the County is made up of individuals identifying as "Asian alone" at 3.7 percent.

A significant portion of the St. Petersburg (7.9 percent) population identifies as Hispanic or Latino origin. Table 8 outlines the overall racial demographics in St. Petersburg while Table 9 outlines ethnicity.

Table 8: St. Petersburg Race Composition

	Estimate	% of Total Population
Total:	259,041	
White	178,111	68.8%
African American	58,646	22.6%
American Indian and Alaska Native	597	0.2%
Asian	9,601	3.7%
Native Hawaiian and Other Pacific Islander	175	0.1%
Other Race	3,388	1.3%
Population of Two or more races	8,523	3.3%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

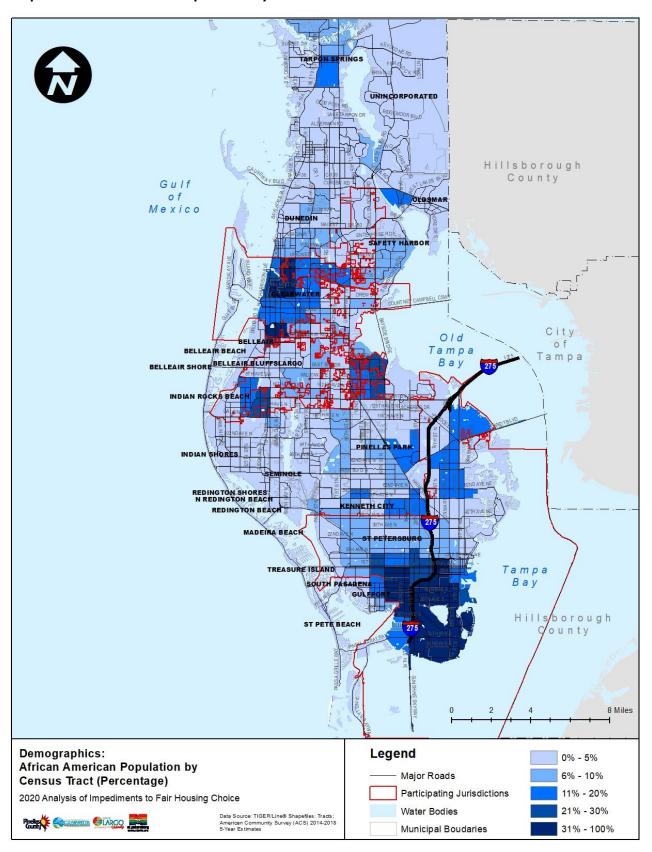
Table 9: St. Petersburg Ethnicity

	Estimate	% of Total Population
Total:	259,041	
Hispanic or Latino	238,635	92.1%
Not Hispanic or Latino	20,406	7.9%

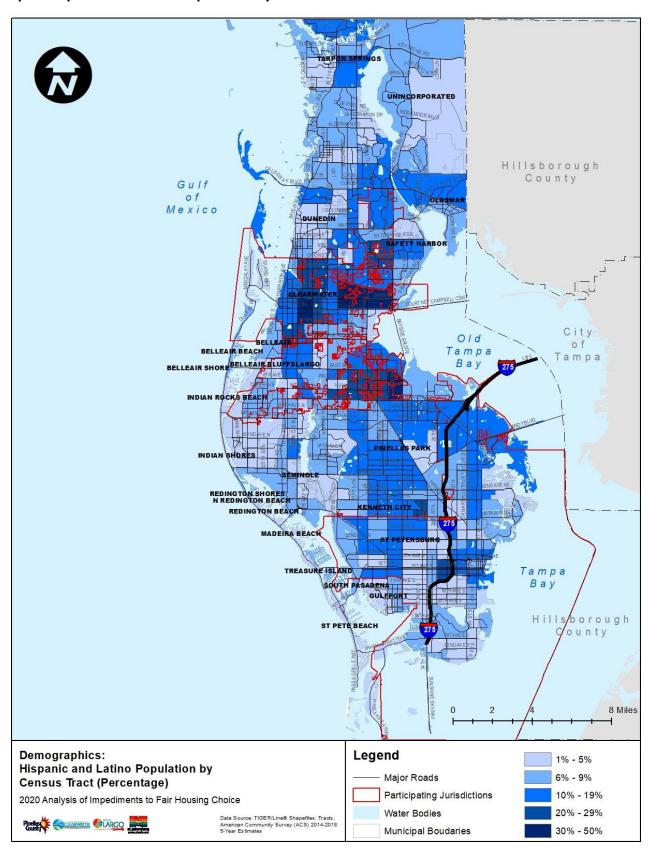
Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Included in Maps 1, 2 and 3 are the population percentages by Census Tract of the three largest racial minority groups in the County as a whole. There are several areas of the County where there are clusters of racial or ethnic minorities, including: Norwood Heights; North Kenwood; North, East, and West of Lealman; Southeast St. Petersburg; the Greater Ridgecrest Area in unincorporated Largo, and areas of Clearwater, north of State Road 60 between McMullen Booth Rd. and N. Keene Rd.; and Tarpon Springs. Although some areas of the County offer a more integrated community composition, a significant portion of the County is composed of predominantly White neighborhoods.

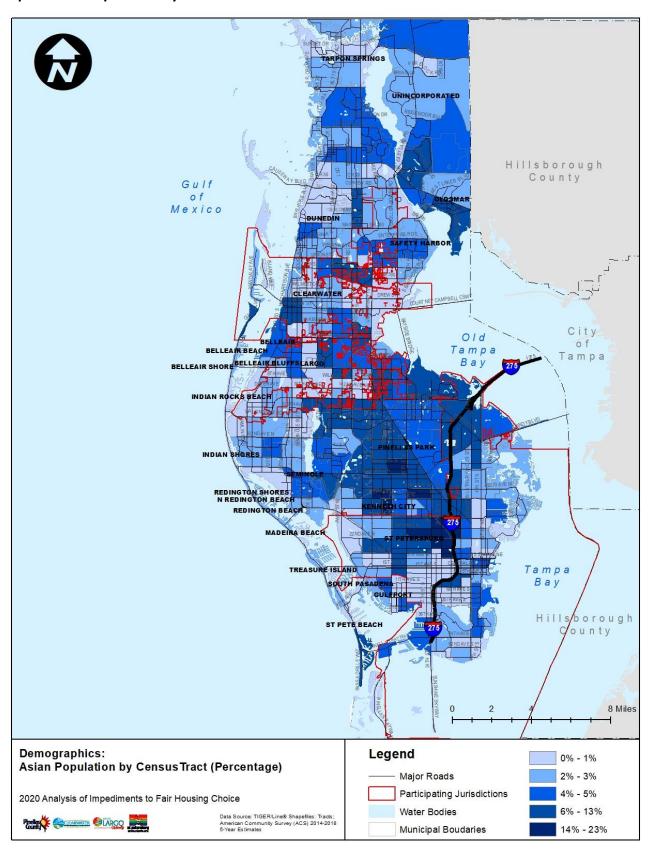
Map 1: African American Population by Census Tract



Map 2: Hispanic and Latino Population by Census Tract



Map 3: Asian Population by Census



Nativity and Language

Pinellas County

Approximately 88 percent (88.1 percent) of Pinellas County residents are native to the United States (2014-2018 ACS); almost 12 percent (11.9 percent) of Pinellas County residents are foreign-born (2014-2018 ACS) and of those 59.2 percent are naturalized citizens. Interestingly, when compared to the national and state data, Pinellas County has a smaller foreign-born population (US - 20.5 percent, FL - 13.5 percent), but a higher percentage of residents who are naturalized (US - 55.1 percent, FL - 48.8 percent)*. This indicates that although fewer of Pinellas County's residents are foreign born, a larger portion of those that are have become citizens. Another item of consideration for the County is the fact that 25.9 percent of foreign-born residents are of Hispanic or Latino origin (of any race), a significantly smaller ratio than the national (44.8 percent) or state (57.2 percent) levels.

Most (94.9 percent) of Pinellas residents over five years of age speak English only or speak English "very well", while 5.1 percent speak English "less than 'very well'" (2014-2018 ACS). This population is important to consider in policy making decisions, service delivery, and housing discrimination issues. Almost half (45.4 percent) of those who speak another language at home, speak Spanish (2014-2018 ACS). The 2018 American Community Survey estimates that 2.7 percent of Pinellas County households do not include English speakers (i.e., English speakers defined as those who only speak English or speak English "very well", age 14 and older). Over 20 percent (20.3 percent) of these households is Spanish speaking, 22.7 percent speak a language of Asian or Pacific Island origin, 14.4 percent speak Indo-European languages, and 13.2 percent are defined as "other".

Per the 2014-2018 ACS Data, of the 3.3 percent Asian population in Pinellas County, the largest group within the Asian population is Vietnamese at 25.1 percent. In the previous AI report, Asians were the fastest growing racial group in Florida and the United States from 2000 to 2010; however, recent ACS estimates show that "some other race alone" has outpaced the Asian population as the fastest growing racial group in Florida, while "Two or more races" has outpaced the Asian population in the United States. Based on 2014-2018 ACS estimates the Asian population in Florida is estimated to be 559,168 whereas the "some other race alone" is estimated to be 580,152.

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

Clearwater

Over 80 percent (84.3 percent) of Clearwater residents are native to the United States (2014-2018 ACS); approximately 16 percent (15.7 percent) of Clearwater residents are foreign-born (2014-2018 ACS) and of those 51.1 percent are naturalized citizens. Interestingly, when compared to the national and state data, Clearwater has a smaller foreign-born population than the nation (US - 20.5 percent) and a larger foreign-born population than the state (FL - 13.5 percent). Clearwater has a smaller percentage of residents than the nation who are naturalized (US - 55.1 percent) and a larger percentage of residents than the state who are naturalized (FL - 48.8 percent)*. When comparing

all four participating jurisdictions, Clearwater has the largest percentage of foreign-born population but the smallest percentage of foreign-born population who are naturalized. This indicates that, out of all four participating jurisdictions, Clearwater has the largest percentage of foreign-born population that are not US citizens. Another item of consideration for Clearwater is the fact that 43.7 percent of foreign-born residents are of Hispanic or Latino origin (of any race), a significantly larger ratio than the other three participating jurisdictions (Pinellas County – 25.9 percent; Largo – 31.6 percent; and St. Petersburg – 20.8 percent). However, Clearwater has a smaller ratio of foreign-born residents of Hispanic or Latino origin (of any race) than national (44.8 percent) and state (57.2 percent) levels.

Most (91.9 percent) of Clearwater's residents over five years of age speak English only or speak English "very well", while 8.1 percent speak English "less than 'very well'" (2014-2018 ACS). This population is important to consider in policy making decisions, service delivery, and housing discrimination issues. Over half (60.7 percent) of those who speak another language at home, speak Spanish (2014-2018 ACS). The 2018 American Community Survey estimates that 3.9 percent of Clearwater households do not include English speakers (i.e., English speakers defined as those who only speak English or speak English "very well", age 14 and older). Over 20 percent (23.4 percent) of these households is Spanish speaking, 11.6 percent speak a language of Asian or Pacific Island origin, 15.6 percent speak Indo-European languages, and 5.5 percent are defined as "other".

Per the 2014-2018 ACS Data, of the 2.4 percent Asian population in Clearwater, the largest group within the Asian population is Vietnamese at 33.4 percent.

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

Largo

Approximately 88 percent (87.5 percent) of Largo residents are native to the United States (2014-2018 ACS); slightly more than 12 percent (12.5 percent) of Largo residents are foreign-born (2014-2018 ACS) and of those 55.5 percent are naturalized citizens. Interestingly, when compared to the national and state data, Largo has a smaller foreign-born population (US - 20.5 percent, FL - 13.5 percent), but a higher percentage of residents who are naturalized (US - 55.1 percent, FL - 48.8 percent)*. This indicates that although fewer of Largo's residents are foreign-born, a larger portion of those that are have become citizens. Another item of consideration for Largo is the fact that 31.6 percent of foreign-born residents are of Hispanic or Latino origin (of any race), a significantly smaller ratio than the national (44.8 percent) or state (57.2 percent) levels.

Most (94.2 percent) of Largo's residents over five years of age speak English only or speak English "very well", while 5.8 percent speak English "less than 'very well'" (2014-2018 ACS). This population is important to consider in policy making decisions, service delivery, and housing discrimination issues. Over half (52.2 percent) of those who speak another language at home, speak Spanish (2014-2018 ACS). The 2018 American Community Survey estimates that 3.7 percent of Largo households do not include English speakers (i.e., English speakers defined as those who only speak English or speak English "very well", age 14 and older). Over a third (33.7 percent) of these households is

Spanish speaking, 18.2 percent speak a language of Asian or Pacific Island origin, 14.7 percent speak Indo-European languages, and 22.1 percent are defined as "other".

Per the 2014-2018 ACS Data, of the 2.3 percent Asian population in Largo, the largest group within the Asian population is Filipino at 32.2 percent.

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

St. Petersburg

Approximately 89 percent (88.8 percent) of St. Petersburg residents are native to the United States (2014-2018 ACS); slightly more than 11 percent (11.2 percent) of St. Petersburg residents are foreign-born (2014-2018 ACS) and of those 60.4 percent are naturalized citizens. Interestingly, when compared to the national and state data, St. Petersburg has a smaller foreign-born population (US – 20.5 percent, FL – 13.5 percent), but a higher percentage of residents who are naturalized (US – 55.1 percent, FL – 48.8 percent)*. This indicates that although fewer of St. Petersburg's residents are foreign-born, a larger portion of those that are have become citizens. When comparing all four participating jurisdictions, St. Petersburg has the smallest percentage of foreign-born residence, but has the largest percentage of foreign-born residents that are naturalized citizens. Another item of consideration for St. Petersburg is the fact that 6.3 percent of foreign-born residents are of Hispanic or Latino origin (of any race), a significantly smaller ratio than the national (13.6 percent) or state (16.9 percent) levels. When comparing all four participating jurisdictions, St. Petersburg has the smallest percentage of foreign-born residents that are of Hispanic or Latino origin (of any race).

Most (95.5 percent) of St. Petersburg's residents over five years of age speak English only or speak English "very well", while 4.5 percent speak English "less than 'very well'" (2014-2018 ACS). This population is important to consider in policy making decisions, service delivery, and housing discrimination issues. Less than half (40.1 percent) of those who speak another language at home, speak Spanish, with those who speak another language at home, speak Spanish (2014-2018 ACS). The 2018 American Community Survey estimates that 2.4 percent of St. Petersburg households do not include English speakers (i.e., English speakers defined as those who only speak English or speak English "very well", age 14 and older). Over 14 percent (14.2 percent) of these households is Spanish speaking, 24.5 percent speak a language of Asian or Pacific Island origin, 16.5 percent speak Indo-European languages, and 24.3 percent are defined as "other".

Per the 2014-2018 ACS Data, of the 3.7 percent Asian population in St. Petersburg, the largest group within the Asian population is Asian Indian at 19.9 percent.

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

Households and Families

Pinellas County

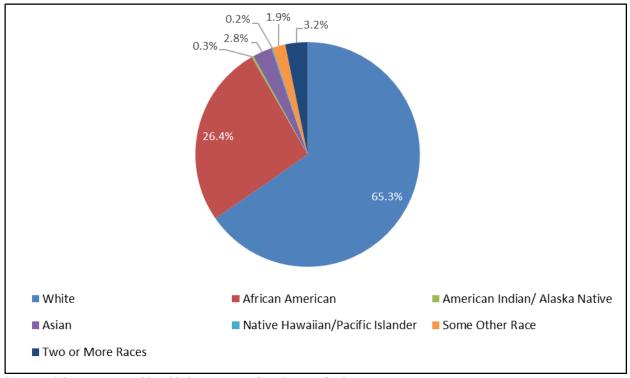
In the 2014-2018 reporting period for the American Community Survey, there were 407,720 households (occupied housing units) in Pinellas County; the average household size was 2.31, while the average family size is 3.04 people.

Families made up 55.8 percent of the households in Pinellas County. Of this figure, married-couple families account for 73.6 percent, male householders with no wife present families account for 7.2 percent, and female householders with no husband present families account for 19.2 percent of family households. Nonfamily households made up 44.2 percent of all households in Pinellas County. Most (82.2 percent) of the nonfamily households were householders living alone. Of note, 38.8 percent of the nonfamily households are at least 65 years old and living alone.

When considering all family types with children present, the data indicates that 69.6 percent of all White households, 15.2 percent of all African American households, 0.2 percent of all American Indian and Alaska Native households and Native Hawaiian and Other Pacific Islander households, 3.6 percent of Asian households, 1.9 percent of all Some other race households, 9.3 percent of all Two or more races households, and 15.8 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics compared in Chart 2; the percentage of total femaleheaded households with children among White households was 65.3 percent, compared to 26.4 percent in African American households. As compared in Chart 6, the percentage of total femaleheaded with children among Hispanic households was 12.0 percent, compared to 88.0 percent in Non-Hispanic households.

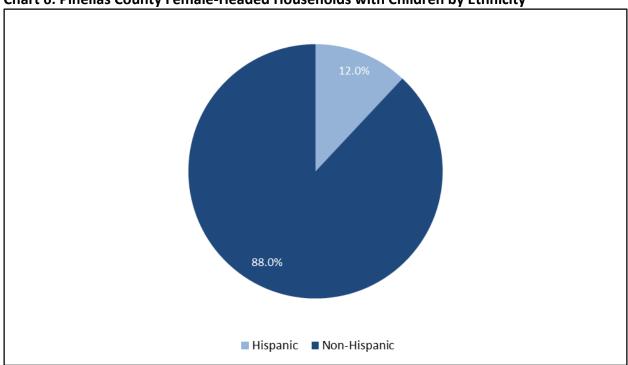
White non-family households made up 45.1 percent of all White households in Pinellas County. African American non-family households accounted for 42.2 percent of all African American households. Hispanic non-family households accounted for 35.6 percent of all Hispanic households.

Chart 5: Pinellas County Female-Headed Households with Children by Race



Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Chart 6: Pinellas County Female-Headed Households with Children by Ethnicity



Source: US Census Bureau, 2014-2018 5-Year American Community Survey

HUD's Violence Against Women Reauthorization Act of 2013 (VAWA) provides for public housing for women who have been victims of domestic violence and their children. VAWA may play a role in the fairly large group of female householders with no husband present. For reference, Community Action Stops Abuse (CASA) is a nonprofit group based in St. Petersburg that provides services to victims of domestic violence. CASA indicated that for their fiscal year 2018-2019 they sheltered 596 adults and children. Additionally, CASA answered 3,794 calls to their hotline. HUD's guidelines can play a role in ensuring that a woman's status as a victim of domestic violence does not pose as an impediment in housing choices. Religious Community Services (RCS) located in Clearwater is a nonprofit group that also provides shelters, permanent housing, food banks, domestic abuse hotline, and elder and senior abuse support.

Clearwater

In the 2014-2018 reporting period for the American Community Survey, there were 46,667 households (occupied housing units) in Clearwater; the average household size was 2.40 people, while the average family size is 3.20 people.

Families made up 56.1 percent of the households in Clearwater. Of this figure, married-couple families account for 70.3 percent, male householders with no wife present families account for 7.8 percent, and female householders with no husband present families account for 21.9 percent of family households. Nonfamily households made up 43.9 percent of all households in Clearwater. Most (82.3 percent) of the nonfamily households were householders living alone. Of note, 40.2 percent of the nonfamily households are at least 65 years old and living alone.

When considering all family types with children present, the data indicates that 65.5 percent of all White households, 16.4 percent of all African American households, 0.5 percent of all American Indian and Alaska Native households, 1.8 percent of Asian households, 0.4 percent of all Native Hawaiian and Other Pacific Islander households, 3.8 percent of all Some other race households, 11.6 percent of all Two or more races households, and 30.1 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics compared in Chart 7; the percentage of total female-headed households with children among White households was 61.4 percent, compared to 22.0 percent in African American households. As compared in Chart 8, the percentage of total female-headed with children among Hispanic households was 32.6 percent, compared to 67.4 percent in Non-Hispanic households.

White non-family households made up 44.5 percent of all White households in Clearwater. African American non-family households accounted for 43.7 percent of all African American households. Hispanic non-family households accounted for 29.1 percent of all Hispanic households.

O.7%
3.7%

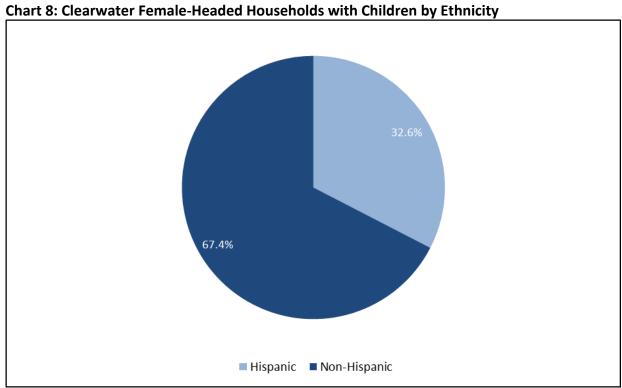
7.5%

61.4%

White
African American
American Indian/Alaska Native
Asian
Native Hawaiian/Pacific Islander
Some Other Race
Two or More Races

Chart 7: Clearwater Female-Headed Households with Children by Race

Source: US Census Bureau, 2014-2018 5-Year American Community Survey



Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Largo

In the 2014-2018 reporting period for the American Community Survey, there were 37,327 households (occupied housing units) in Largo; the average household size was 2.21 people, while the average family size is 2.99 people.

Families made up 51.2 percent of the households in Largo. Of this figure, married-couple families account for 72.4 percent, male householders with no wife present families account for 7.4 percent, and female householders with no husband present families account for 20.2 percent of family households. Nonfamily households made up 48.8 percent of all households in Largo. Most (80.1 percent) of the nonfamily households were householders living alone. Of note, 40.4 percent of the nonfamily households are at least 65 years old and living alone.

When considering all family types with children present, the data indicates that 77.2 percent of all White households, 8.2 percent of all African American households, 0.0 percent of all American Indian and Alaska Native households, 2.0 percent of Asian households, 0.5 percent of all Native Hawaiian and Other Pacific Islander households, 1.8 percent of all Some other race households, 10.4 percent of all Two or more races households, and 20.4 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics compared in Chart 9; the percentage of total female-headed households with children among White households was 79.6 percent, compared to 15.4 percent in African American households. As compared in Chart 10, the percentage of total female-headed with children among Hispanic households was 9.1 percent, compared to 90.9 percent in Non-Hispanic households.

White non-family households made up 48.9 percent of all White households in Largo. African American non-family households accounted for 57.7 percent of all African American households. Hispanic non-family households accounted for 34.1 percent of all Hispanic households.

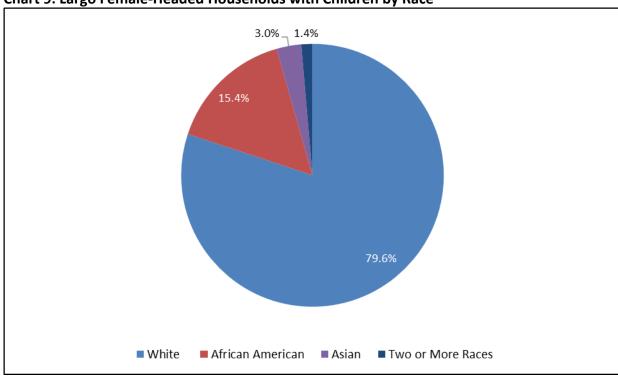


Chart 9: Largo Female-Headed Households with Children by Race

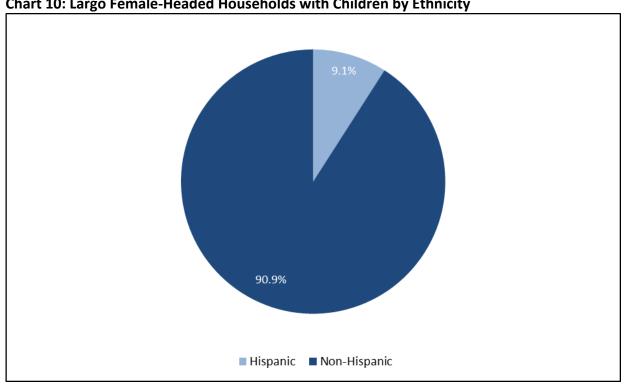


Chart 10: Largo Female-Headed Households with Children by Ethnicity

St. Petersburg

In the 2014-2018 reporting period for the American Community Survey, there were 107,173 households (occupied housing units) in St. Petersburg; the average household size was 2.36 people, while the average family size is 3.16 people.

Families made up 53.6 percent of the households in St. Petersburg. Of this figure, married-couple families account for 67.0 percent, male householders with no wife present families account for 8.1 percent, and female householders with no husband present families account for 24.9 percent of family households. Nonfamily households made up 46.4 percent of all households in St. Petersburg. Most (79.8 percent) of the nonfamily households were householders living alone. Of note, 28.2 of the nonfamily households are at least 65 years old and living alone.

When considering all family types with children present, the data indicates that 54.1 percent of all White households, 31.0 percent of all African American households, 0.1 percent of all American Indian and Alaska Native households, 3.7 percent of Asian households, 1.7 percent of all Some other race households, 9.4 percent of all Two or more races households, and 11.1 percent of all Hispanic households were in this household type. However, minority households face the most significant challenges to fair housing choice, largely due to their household characteristics compared in Chart 11; the percentage of total female-headed households with children among White households was 44.7 percent, compared to 47.1 percent in African American households. As compared in Chart 12, the percentage of total female-headed with children among Hispanic households was 8.9 percent, compared to 91.1 percent in Non-Hispanic households.

White non-family households made up 48.6 percent of all White households in St. Petersburg. African American non-family households accounted for 41.4 percent of all African American households. Hispanic non-family households accounted for 43.5 percent of all Hispanic households.

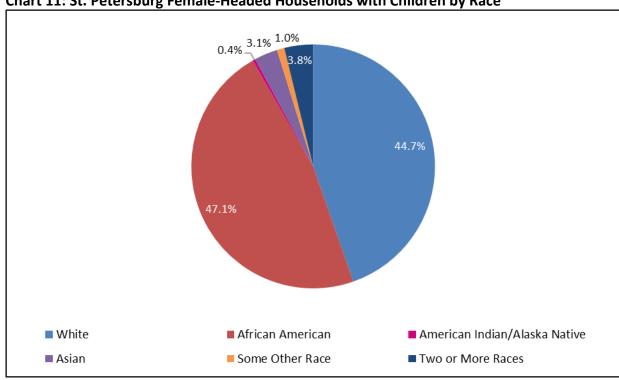
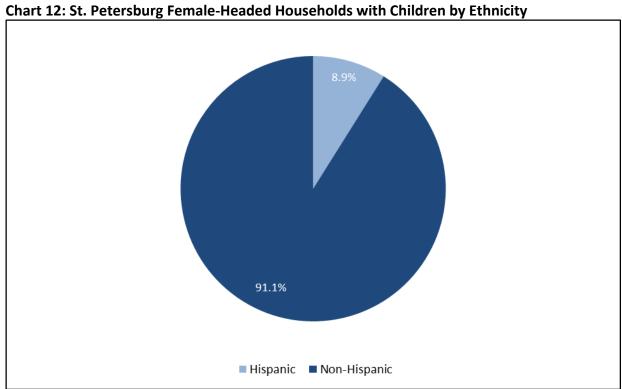


Chart 11: St. Petersburg Female-Headed Households with Children by Race



Disability

Pinellas County

According to the 2014-2018 American Community Survey, in Pinellas County, over fifteen percent (15.3 percent) of the population, or 145,083 individuals, had disabilities. Less than one percent (0.7 percent) of the population under 18 years old had one or more disabilities; approximately seven percent (6.8 percent) of the population aged 18 to 64 years old had one or more disabilities; approximately eight percent (7.8 percent) of the population aged 64 and older reported having one or more disabilities. Table 10 below indicates the estimates of the population with disabilities by age group.

Table 10: Pinellas County Population with Disabilities by Age Group for 2018

Subject	Number with a Percent with a		
	Disability	Disability	
Total civilian non-institutionalized population	145,083	15.3%	
Population under 18 years	6,923	0.7%	
With a hearing difficulty	845	0.5%	
With a vision difficulty	916	0.8%	
With a cognitive difficulty	5,142	4.4%	
With an ambulatory difficulty	690	0.6%	
With a self-care difficulty	1,248	1.1%	
Population 18 to 64 years	64,526	6.8%	
With a hearing difficulty	12,168	2.2%	
With a vision difficulty	12,179	2.2%	
With a cognitive difficulty	27,460	4.9%	
With an ambulatory difficulty	32,998	5.8%	
With a self-care difficulty	11,272	2.0%	
With an independent living difficulty	24,123	4.3%	
Population 65 years and over	73,634	7.8%	
With a hearing difficulty	31,855	14.3%	
With a vision difficulty	13,358	6.0%	
With a cognitive difficulty	17,891	8.0%	
With an ambulatory difficulty	46,141	20.7%	
With a self-care difficulty	16,033	7.2%	
With an independent living difficulty	28,556	12.8%	

Clearwater

According to the 2014-2018 American Community Survey, in Clearwater, approximately fourteen percent (13.8 percent) of the population, or 15,642 individuals, had disabilities. Less than one percent (0.7 percent) of the population under 18 years old had one or more disabilities; less than seven percent (6.4 percent) of the population aged 18 to 64 years old had one or more disabilities; approximately seven percent (6.7 percent) of the population aged 64 and older reported having one or more disabilities. Table 11 below indicates the estimates of the population with disabilities by age group.

Table 11: Clearwater Population with Disabilities by Age Group for 2018

Subject	Number with a Percent with a		
	Disability	Disability	
Total civilian non-institutionalized population	15,642	13.8%	
Population under 18 years	842	0.7%	
With a hearing difficulty	107	0.4%	
With a vision difficulty	123	0.6%	
With a cognitive difficulty	718	4.6%	
With an ambulatory difficulty	97	0.6%	
With a self-care difficulty	209	1.3%	
Population 18 to 64 years	7,183	6.4%	
With a hearing difficulty	1,223	1.8%	
With a vision difficulty	1,390	2.1%	
With a cognitive difficulty	2,915	4.3%	
With an ambulatory difficulty	3,836	5.7%	
With a self-care difficulty	1,332	2.0%	
With an independent living difficulty	2,534	3.8%	
Population 65 years and over	7,617	6.7%	
With a hearing difficulty	3,207	13.2%	
With a vision difficulty	1,347	5.6%	
With a cognitive difficulty	2,034	8.4%	
With an ambulatory difficulty	5,280	21.8%	
With a self-care difficulty	1,899	7.8%	
With an independent living difficulty	3,021	12.5%	

Largo

According to the 2014-2018 American Community Survey, in Largo, approximately seventeen percent (17.1 percent) of the population, or 14,085 individuals, had disabilities. Less than one percent (0.8 percent) of the population under 18 years old had one or more disabilities; approximately seven percent (7.2 percent) of the population aged 18 to 64 years old had one or more disabilities; approximately nine percent (9.2 percent) of the population aged 64 and older reported having one or more disabilities. Table 12 below indicates the estimates of the population with disabilities by age group.

Table 12: Largo Population with Disabilities by Age Group for 2018

Subject	Number with a	Percent with a
	Disability	Disability
Total civilian non-institutionalized population	14,085	17.1%
Population under 18 years	618	0.8%
With a hearing difficulty	23	0.2%
With a vision difficulty	95	0.7%
With a cognitive difficulty	472	4.8%
With an ambulatory difficulty	93	0.9%
With a self-care difficulty	123	1.2%
Population 18 to 64 years	5,888	7.2%
With a hearing difficulty	1,384	2.9%
With a vision difficulty	1,300	2.7%
With a cognitive difficulty	2,324	4.8%
With an ambulatory difficulty	2,828	5.9%
With a self-care difficulty	790	1.6%
With an independent living difficulty	2,031	4.2%
Population 65 years and over	7,579	9.2%
With a hearing difficulty	3,472	16.5%
With a vision difficulty	1,370	6.5%
With a cognitive difficulty	1,636	7.8%
With an ambulatory difficulty	4,540	21.6%
With a self-care difficulty	1,573	7.5%
With an independent living difficulty	2,719	13.0%

St. Petersburg

According to the 2014-2018 American Community Survey, in St. Petersburg, approximately fourteen percent (13.9 percent), or 35,622 individuals, had disabilities. Less than one percent (0.7 percent) of the population under 18 years old had one or more disabilities; approximately seven percent (7.3 percent) of the population aged 18 to 64 years old had one or more disabilities; approximately six percent (5.8 percent) of the population aged 64 and older reported having one or more disabilities. Table 13 below indicates the estimates of the population with disabilities by age group.

Table 13: St. Petersburg Population with Disabilities by Age Group for 2018

Subject	Number with a	Percent with a
	Disability	Disability
Total civilian non-institutionalized population	35,622	13.9%
Population under 18 years	1,909	0.7%
With a hearing difficulty	128	0.3%
With a vision difficulty	187	0.4%
With a cognitive difficulty	1,480	4.5%
With an ambulatory difficulty	158	0.5%
With a self-care difficulty	289	0.9%
Population 18 to 64 years	18,277	7.3%
With a hearing difficulty	2,955	1.8%
With a vision difficulty	3,263	2.0%
With a cognitive difficulty	8,515	5.1%
With an ambulatory difficulty	9,393	5.7%
With a self-care difficulty	3,064	1.8%
With an independent living difficulty	7,355	4.4%
Population 65 years and over	14,886	5.8%
With a hearing difficulty	5,755	12.8%
With a vision difficulty	2,761	6.2%
With a cognitive difficulty	4,005	8.9%
With an ambulatory difficulty	9,222	20.5%
With a self-care difficulty	3,423	7.6%
With an independent living difficulty	6,358	14.2%

Veterans

Pinellas County

Pinellas County's veteran population over the age of 18 (85,825) was estimated to be 10.8 percent of the total population (2014-2018 ACS). This figure is 3.3 percentage points higher than the national average but is likely attributable to several factors including the presence of the Bay Pines Veterans Administration Medical Center, proximity to MacDill Air Force Base, and general appeal to retirees; in fact, 74.7 percent of Pinellas County veterans are 55 or older, as compared to the 44.3 percent national average.

Clearwater

Clearwater's veteran population over the age of 18 (9,100) was estimated to be 9.8 percent of the total population (2014-2018 ACS). This figure is 2.3 percentage points higher than the national average; in fact, 42.7 percent of Clearwater veterans are 55 or older, as compared to the 44.3 percent national average.

Largo

Largo's veteran population over the age of 18 (8,561) was estimated to be 12.3 percent of the total population (2014-2018 ACS). This figure is 4.8 percentage points higher than the national average; in fact, 50.5 percent of Largo veterans are 55 or older, as compared to the 44.3 percent national average.

St. Petersburg

St. Petersburg's veteran population over the age of 18 (20,922) was estimated to be 9.8 percent of the total population (2014-2018 ACS). This figure is 2.3 percentage points higher than the national average; in fact, 42.0 percent of St. Petersburg veterans are 55 or older, as compared to the 44.3 percent national average.

Education

Pinellas County

In the 2014-2018 reporting period for the American Community Survey, 91.1 percent of people age 25 years and over in Pinellas County had at least graduated from high school and 31.0 percent had a Bachelor's degree or higher. Only 6.1 percent of those 25 years of age or older had no more than a 9th grade education.

Pinellas County school enrollment for those 3 years of age or older was 181,917 (2014-2018 ACS). Nursery school/preschool enrollment accounted for 6.5 percent of total enrollment; kindergarten through grade 12 was 64.0 percent of enrollment; 23.7 percent of enrolled individuals were those

enrolled in college undergraduate work; and graduate students accounted for the other 5.7 percent. The total median income in Pinellas County is \$35,596. Median income is correlated to educational attainment, with those individuals with only a high school diploma earning 58.5 percent and 47.5 percent of what Bachelor's degree and graduate degree holders earn, respectively. Table 14 reflects this correlation and the relationship between median earnings of each category to the Pinellas County median individual income.

Table 14: Pinellas County Median Income of Those 25 and Older by Educational Attainment

Median Income	Estimate	% of Total
Less than high school graduate	\$21,985	61.1%
High school graduate (includes equivalency)	\$28,583	79.5%
Some college or associate's degree	\$33,533	93.3%
Bachelor's degree	\$48,887	135.9%
Graduate or professional degree	\$60,194	167.4%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

A correlation can also be seen for graduation rates for Pinellas County School District students by race. Table 15 summarizes this data for school year 2018-2019. Students identifying as Asian graduate at the highest rates (94.5 percent for their racial group), followed by Two or more races students at 90.9 percent. White students graduate at 90.5 percent, Hispanic students graduate at 86.7 percent, and African American students graduate at 81.3 percent. American Indian or Alaska Native (73.7 percent) and Native Hawaiian or Pacific Islander (72.2 percent) students have the lowest graduation rates for the County. There is no graduation rate data available for the municipal jurisdictions (Clearwater, Largo, and St. Petersburg).

Table 15: Pinellas County Graduation Rates by Race 2018-19

Race/Ethnicity of Student	2018-19 Graduates	2018-19 Cohort	2018-19 Graduation
White	3,959	4,376	90.5%
Hispanic	1,027	1,184	86.7%
African American	1,067	1,313	81.3%
Two or more races	250	275	90.9%
Asian	393	416	94.5%
American Indian or Alaska Native	14	19	73.7%
Native Hawaiian or Pacific Islander	13	18	72.2%

Source: Florida Department of Education 2018-219

Clearwater

In the 2014-2018 reporting period for the American Community Survey, 89.7 percent of people age 25 years and over in Clearwater had at least graduated from high school and 28.9 percent had a Bachelor's degree or higher. Only 3.7 percent of those 25 years of age or older had no more than a 9th grade education.

Clearwater school enrollment for those 3 years of age or older was 22,754 (2014-2018 ACS). Nursery

school/preschool enrollment accounted for 6.4 percent of total enrollment; kindergarten through grade 12 was 67.3 percent of enrollment; 21.6 percent of enrolled individuals were those enrolled in college undergraduate work; and graduate students accounted for the other 4.7 percent.

The total median income in Clearwater is \$33,667. Median income is correlated to educational attainment, with those individuals with only a high school diploma earning 57.9 percent and 49.9 percent of what Bachelor's degree graduate degree holders earn, respectively. Table 16 reflects this correlation and the relationship between median earnings of each category to the Clearwater median individual income.

Table 16: Clearwater Median Income of Those 25 and Older by Educational Attainment

Median Income	Estimate	% of Total
Less than high school graduate	\$21,357	63.4%
High school graduate (includes equivalency)	\$27,003	80.2%
Some college or associate's degree	\$33,083	98.3%
Bachelor's degree	\$46,657	138.6%
Graduate or professional degree	\$54,141	160.8%

Source: US Census Bureau, 2014-2018 5-Year American Community Survey

Largo

In the 2014-2018 reporting period for the American Community Survey, 90.8 percent of people age 25 years and over in Largo had at least graduated from high school and 22.4 percent had a Bachelor's degree or higher. Only 2.7 percent of those 25 years of age or older had no more than a 9th grade education.

Largo school enrollment for those 3 years of age or older was 14,461 (2014-2018 ACS). Nursery school/preschool enrollment accounted for 6.6 percent of total enrollment; kindergarten through grade 12 was 64.3 percent of enrollment; 24.0 percent of enrolled individuals were those enrolled in college undergraduate work; and graduate students accounted for the other 5.1 percent.

The total median income in Largo is \$31,412. Median income is correlated to educational attainment, with those individuals with only a high school diploma earning 60.0 percent and 59.2 percent of what Bachelor's degree graduate degree holders earn, respectively. Table 17 reflects this correlation and the relationship between median earnings of each category to the Largo median individual income.

Table 17: Largo Median Income of Those 25 and Older by Educational Attainment

Median Income	Estimate	% of Total
Less than high school graduate	\$20,676	65.8%
High school graduate (includes equivalency)	\$26,075	83.0%
Some college or associate's degree	\$31,847	101.4%
Bachelor's degree	\$43,488	138.4%
Graduate or professional degree	\$44,051	140.2%

St. Petersburg

In the 2014-2018 reporting period for the American Community Survey, 91.0 percent of people age 25 years and over in St. Petersburg had at least graduated from high school and 34.5 percent had a Bachelor's degree or higher. Only 2.8 percent of those 25 years of age or older had no more than a 9th grade education.

St. Petersburg school enrollment for those 3 years of age or older was 56,149 (2014-2018 ACS). Nursery school/preschool enrollment accounted for 6.6 percent of total enrollment; kindergarten through grade 12 was 60.4 percent of enrollment; 26.2 percent of enrolled individuals were those enrolled in college undergraduate work; and graduate students accounted for the other 6.8 percent.

The total median income in St. Petersburg is \$36,800. Median income is correlated to educational attainment, with those individuals with only a high school diploma earning 59.1 percent and 47.5 percent of what Bachelor's degree graduate degree holders earn, respectively. Table 18 reflects this correlation and the relationship between median earnings of each category to the St. Petersburg median individual income.

Table 18: St. Petersburg Median Income of Those 25 and Older by Educational Attainment

Median Income	Estimate	% of Total
Less than high school graduate	\$23,132	62.9%
High school graduate (includes equivalency)	\$29,386	79.9%
Some college or associate's degree	\$32,191	87.5%
Bachelor's degree	\$4,706	135.1%
Graduate or professional degree	\$61,884	168.2%

Income

Pinellas County

Based on the 2014-2018 American Community Survey, the per capita annual income for Pinellas County was \$33,478. The median annual income for households was \$51,454, which affords approximately \$1,286 a month for housing costs; the median annual family income was \$68,522, affording \$1,713 per month for housing costs; the median Married-couple family annual income of \$81,120, affording \$2,028 per month for housing costs; and the median non-family annual income of \$33,710, affording \$843. Slightly more than 68 percent (68.4 percent) of households (278,783) received earnings (wages), with a mean wage for workers of \$76,988 annually, and 40.4 percent of households (164,614) received Social Security, with the mean income from Social Security at \$19,653 annually.

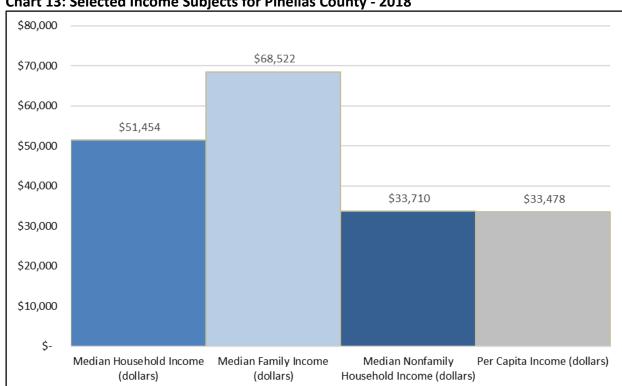


Chart 13: Selected Income Subjects for Pinellas County - 2018

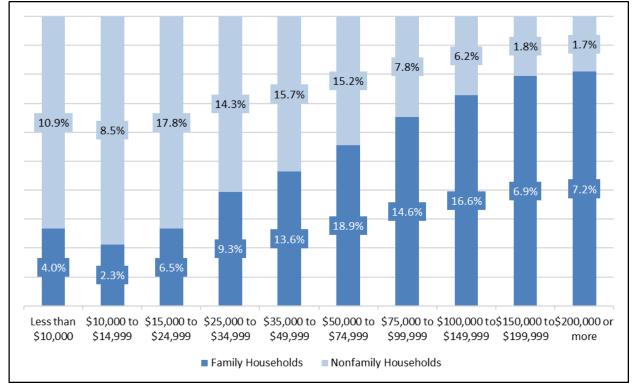


Chart 14: Pinellas County Income for Total Households and Families - 2018

Clearwater

Based on the 2014-2018 American Community Survey, the per capita annual income for Clearwater was \$30,579. The median annual income for households was \$47,070, which affords approximately \$1,177 a month for housing costs; the median annual family income was \$63,604, affording \$1,590 per month for housing costs; the median Married-couple family annual income of \$76,726, affording \$1,918 per month for housing costs; and the median non-family annual income of \$31,802, affording \$795. Approximately 66 percent (65.7 percent) of households (30,651) received earnings (wages), with a mean wage for workers of \$70,237 annually, and 38.9 percent of households (18,160) received Social Security, with the mean income from Social Security at \$19,302 annually.

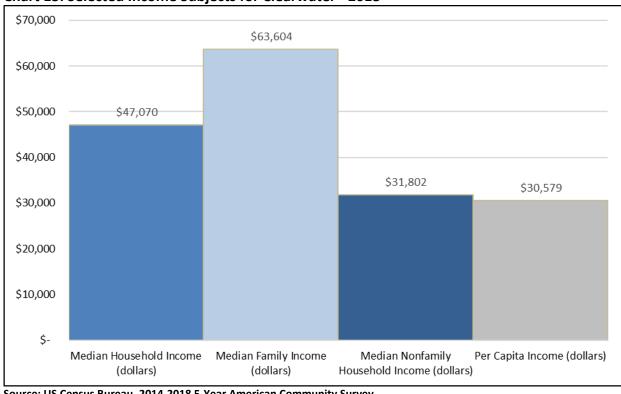
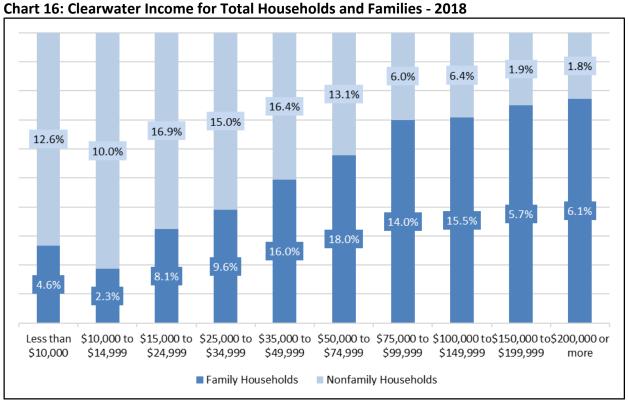


Chart 15: Selected Income Subjects for Clearwater - 2018



Largo

Based on the 2014-2018 American Community Survey, the per capita annual income for Largo was \$28,279. The median annual income for households was \$42,416, which affords approximately \$1,060 a month for housing costs; the median annual family income was \$57,256, affording \$1,431 per month for housing costs; the median Married-couple family annual income of \$67,479, affording \$1,687 per month for housing costs; and the median non-family annual income of \$30,733, affording \$768. Slightly more than 64 percent (64.2 percent) of households (23,973) received earnings (wages), with a mean wage for workers of \$59,463 annually, and 41.7 percent of households (15,560) received Social Security, with the mean income from Social Security at \$19,309 annually.

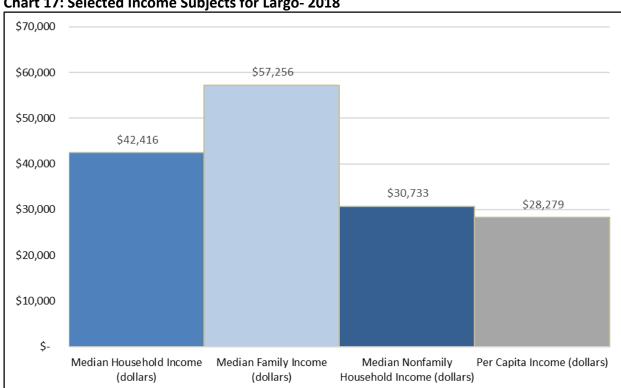


Chart 17: Selected Income Subjects for Largo- 2018

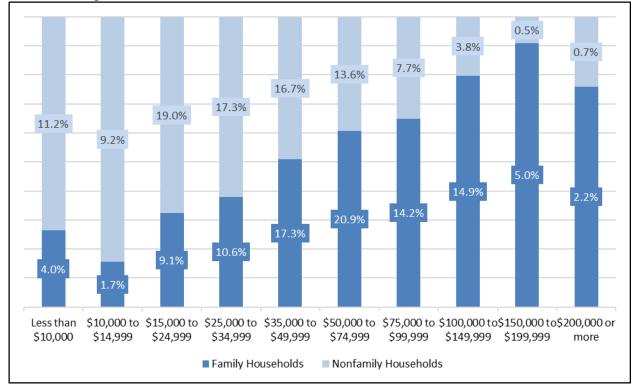


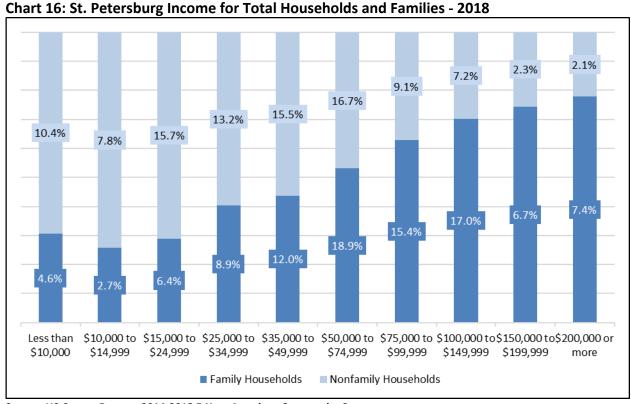
Chart 18: Largo Income for Total Households and Families - 2018

St. Petersburg

Based on the 2014-2018 American Community Survey, the per capita annual income for St. Petersburg was \$33,356. The median annual income for households was \$53,816, which affords approximately \$1,345 a month for housing costs; the median annual family income was \$70,431, affording \$1,761 per month for housing costs; the median Married-couple family annual income of \$87,131, affording \$2,178 per month for housing costs; and the median non-family annual income of \$36,950, affording \$924. Approximately 72 percent (71.7 percent) of households (76,790) received earnings (wages), with a mean wage for workers of \$75,126 annually, and 33.1 percent of households (35,430) received Social Security, with the mean income from Social Security at \$18,859 annually.

\$80,000 \$70,431 \$70,000 \$60,000 \$53,816 \$50,000 \$40,000 \$36,950 \$33,356 \$30,000 \$20,000 \$10,000 \$-Median Household Income Median Family Income Median Nonfamily Per Capita Income (dollars) (dollars) (dollars) Household Income (dollars)

Chart 19: Selected Income Subjects for St. Petersburg- 2018



Hillsborough County Gulf o f OLDSMAR Mexico City Old of Tampa Tampa BELLEAIR SHORE BELLEAIR BLUF Bay REDINGTON SHORES N REDINGTON BEACH KENNETH CITY REDINGTON BEACH MADEIRA BEACH Tampa Bay Hills borough ounty 8 Miles Legend Median Income by Household by Census Tract (Dollars) \$0.00 - \$30,000.00 \$30,000.01 - \$50,000.00 Major Roads \$50,000.01 - \$70,000.00 Participating Jurisdictions 2020 Analysis of Impediments to Fair Housing Choice \$70,000.01 - \$90,000.00 Water Bodies Data Source: TIGER/Line® Shapefiles: Tracts; American Community Survey (ACS) 2014-2018 5-Year Estimates Pinelle CLARWATER SINGO Municipal Boudaries \$90,000.01 - \$120,000.00

Map 4: Median Household Income by Census Tract for Pinellas County - 2018

Poverty

Pinellas County

According to the 2014-2018 American Community Survey, 13.0 percent of people in Pinellas County were in poverty. Approximately 18 percent (18.4 percent) of related children under 18, 12.8 percent of people 18-64 years old, and 9.7 percent of people at least 65 years old were below the poverty level. For all family types, 8.6 percent were below the poverty level and 4.3 percent of married families were below the poverty level. Furthermore, 23.4 percent of families consisting of female householders with no husband present families were below the poverty level.

Racial and ethnic groups are also disproportionately affected by poverty. Approximately 11.2 percent of White Pinellas County residents live in poverty; however, 26.4 percent of African American persons fall below the poverty level, followed by 18.3 percent of those who identify as "Two or more races" and American Indian and Alaska Native persons, 12.6 percent of Asian persons, and 12.0 percent of those who identify with "Some other race alone". Individuals who identify as of Hispanic or Latino origin (of any race) also see higher rates of poverty (17.4 percent).

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

Clearwater

According to the 2014-2018 American Community Survey, 15.9 percent of people in Clearwater were in poverty. Approximately 25 percent (25.2 percent) of related children under 18, 14.5 percent of people 18-64 years old, and 11 percent of people at least 65 years old were below the poverty level. For all family types, 10.9 percent were below the poverty level and 5.4 percent of married families were below the poverty level. Furthermore, 29.0 percent of families consisting of female householders with no husband present families were below the poverty level.

Racial and ethnic groups are also disproportionately affected by poverty. Approximately 14 percent (13.8 percent) of White Clearwater residents live in poverty; however, 27.7 percent of those who identify as "Two or more races" fall below the poverty level, followed by 25.6 percent of Asian persons, 25.5 percent of African American persons, 14.9 percent of those who identify with "Some other race alone", and 4.2 percent of American Indian and Alaska Native persons. Individuals who identify as of Hispanic or Latino origin (of any race) also see higher rates of poverty (23.7 percent).

Largo

According to the 2014-2018 American Community Survey, 13.2 percent of people Largo were in poverty. Approximately 16 percent (16.3 percent) of related children under 18, 13.7 percent of people 18-64 years old, and 10.3 percent of people at least 65 years old were below the poverty level. For all family types, 8.1 percent were below the poverty level and 4.6 percent of married families were below the poverty level. However, 20.5 percent of families consisting of female

householders with no husband present families were below the poverty level.

Racial and ethnic groups are also disproportionately affected by poverty. Twelve (12.0) percent of White Largo residents live in poverty; however 28.7 percent of American Indian and Alaska Native persons fall below the poverty level, followed by 25.7 percent of African American persons, 23.8 percent of those who identify with "Two or more races," 4.6 percent of Native Hawaiian and Other Pacific Islander persons, and 12 percent of those who identify as "Some other race". Individuals who identify as of Hispanic or Latino origin (of any race) also see higher rates of poverty (16.9 percent).

St. Petersburg

According to the 2014-2018 American Community Survey, 14.9 percent of people St. Petersburg were in poverty. Approximately 24 percent (23.6 percent) of related children under 18, 14.0 percent of people 18-64 years old, and 9.4 percent of people at least 65 years old were below the poverty level. For all family types, 10.0 percent were below the poverty level and 3.8 percent of married families were below the poverty level. However, 25.0 percent of families consisting of female householders with no husband present families were below the poverty level.

Racial and ethnic groups are also disproportionately affected by poverty. Eleven (11.0) percent of White Largo residents live in poverty; however 26.7 percent of African American persons fall below the poverty level, followed by 22.9 percent of Native Hawaiian and Other Pacific Islander persons, 22.1 percent of American Indian and Alaska Native persons, 18.6 percent of those who identify with "Two or more races," 12.2 percent of Asian persons, 10.5 percent of those who identify as "some other race." Individuals who identify as of Hispanic or Latino origin (of any race) also see higher rates of poverty (14.6 percent).

Employment and Unemployment

Pinellas County

According to the 2014-2018 American Community Survey, 58.0 percent of the population in Pinellas County aged 16 years and over were in the labor force. The size of the civilian labor force was 472,955, with a civilian labor force unemployment rate below 4 percent (3.3 percent). Females aged 16 years and over accounted for 233,079 of the civilian labor force. Comparatively, the unemployment rate of the population 16 years and over in Pinellas County is 5.7 percent. The age group with the highest unemployment is age 16 to 19 years at 16.4 percent, followed by age 20 to 24 years at 9.9, and age 30 to 34 years at 5.8 percent. The highest unemployment rate of any racial and ethnic group is African American at 9.1 percent, followed by those who identify as "Two or more races" at 9.0 percent, and American Indian and Alaska Native at 7.9 percent.

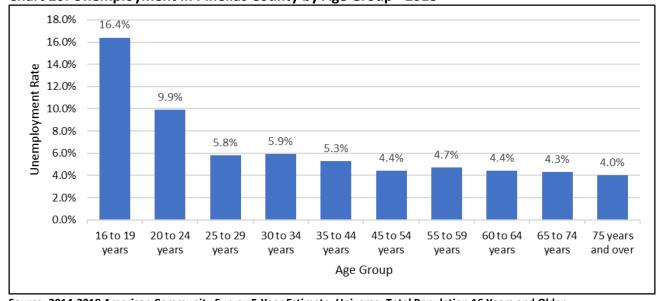


Chart 20: Unemployment in Pinellas County by Age Group - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

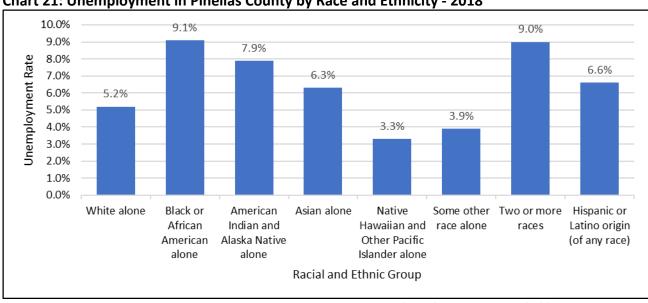


Chart 21: Unemployment in Pinellas County by Race and Ethnicity - 2018

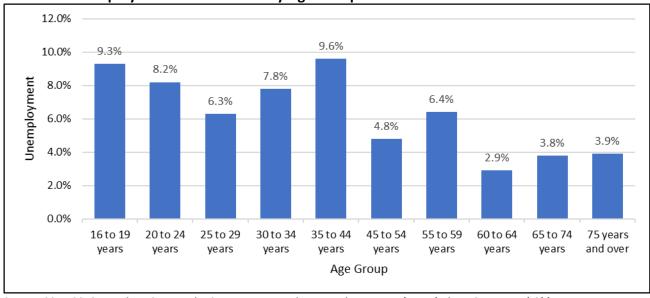
Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

Clearwater

According to the 2014-2018 American Community Survey, approximately 59 percent (58.8 percent) of the population in Clearwater aged 16 years and over were in the labor force. The size of the civilian labor force was 56,053, with a civilian labor force unemployment rate below 4 percent (3.9 percent). Females aged 16 years and over accounted for 27,525 of the civilian labor force. Comparatively, the unemployment rate of the population 16 years and over in Clearwater is 6.7 percent. The age group with the highest unemployment is age 35 to 44 years at 9.6 percent, followed by age 16 to 19 years at 9.3 percent. The highest unemployment rate of any racial and ethnic group is Native Hawaiian and Other Pacific Islander at 16.2 percent, followed by African

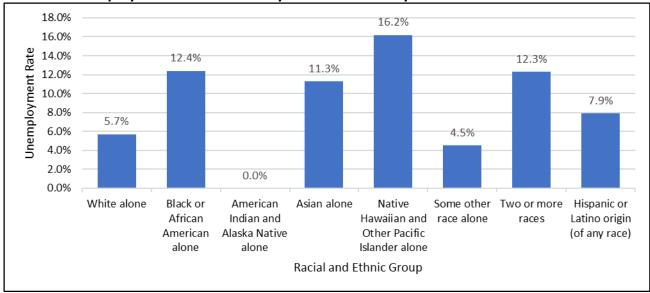
American at 12.4 percent, and those who identify as "Two or more races" at 12.3 percent.

Chart 22: Unemployment in Clearwater by Age Group - 2018



Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

Chart 23: Unemployment in Clearwater by Race and Ethnicity - 2018



Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

Largo

According to the 2014-2018 American Community Survey, approximately 58 percent (57.8 percent) of the population in Largo aged 16 years and over were in the labor force. The size of the civilian labor force was 40,976, with a civilian labor force unemployment rate below 4 percent (3.6 percent). Females aged 16 years and over accounted for 20,170 of the civilian labor force. Comparatively, the unemployment rate of the population 16 years and over in Largo is 6.2 percent. The age group with the highest unemployment is age 16 to 19 years at 23.8 percent, followed by age 20 to 24 years at 11.5 percent and age, and age 65 to 74 years is at 7.9 percent. The highest unemployment rate of any racial and ethnic group is African American at 8.2 percent, followed by Asian at 6.5 percent, and White at 6.2 percent.

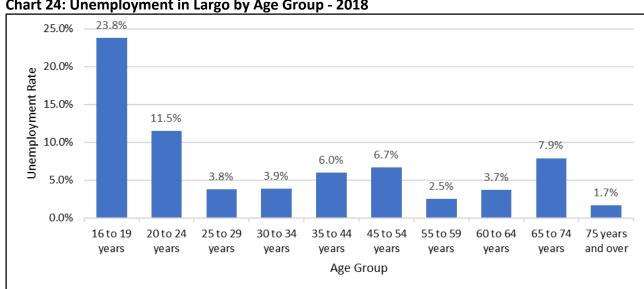


Chart 24: Unemployment in Largo by Age Group - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

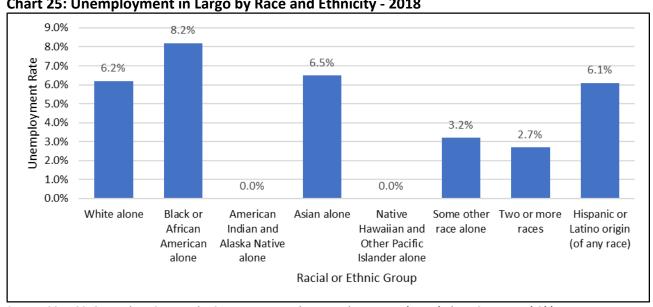


Chart 25: Unemployment in Largo by Race and Ethnicity - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

St. Petersburg

According to the 2014-2018 American Community Survey, approximately 63 percent (62.9 percent) of the population in St. Petersburg aged 16 years and over were in the labor force. The size of the civilian labor force was 137,017, with a civilian labor force unemployment rate below 4 percent (3.4 percent). Females aged 16 years and over accounted for 68,321 of the civilian labor force. Comparatively, the unemployment rate of the population 16 years and over in St. Petersburg is 5.5 percent. The age group with the highest unemployment is age 16 to 19 years at 21.1 percent, followed by age 20 to 24 years at 10.8 percent and age, and age 30 to 34 is at 5.4 percent. The highest unemployment rate of any racial and ethnic group is those who identify as "Two or more races" at 10.0 percent, followed by African American at 8.0percent, Asian at 7.5 percent.

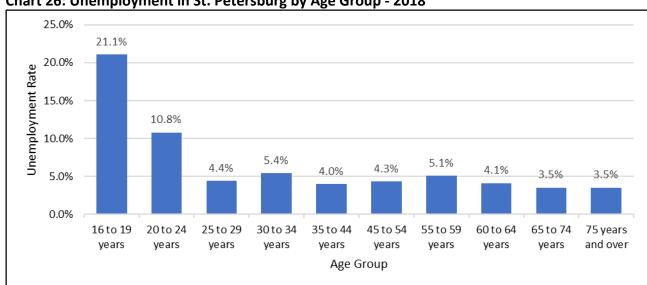
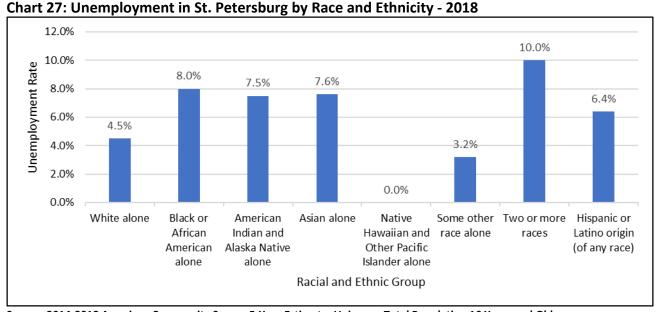


Chart 26: Unemployment in St. Petersburg by Age Group - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older



Source: 2014-2018 American Community Survey 5-Year Estimate; Universe: Total Population 16 Years and Older

Employment by Industry

Pinellas County

According to the 2014-2018 ACS, the civilian employed population 16 years and over in Pinellas County was 446,120. Approximately 99,808 people were employed in the Educational services, and health care and social assistance industry with the largest percentage (22.4 percent) of people employed in Pinellas County than any other industry. Women made up almost three quarters (74.2 percent) of all employed in this industry. Professional, scientific, and management, and administrative and waste was the second largest industry employing 14.1 percent of people. Men made up over half (54.3 percent) of all employed in this industry. Agriculture, forestry, fishing and hunting, and mining consisted of less than 1 percent (0.3 percent) of people employed in this industry.

Table 19: Percent Employment by Industry in Pinellas County - 2018

Industry	Percent
Educational services, and health care and social assistance	22.4%
Professional, scientific, and management, and administrative and waste management	14.1%
Retail trade	12.8%
Arts, entertainment, and recreation, and accommodation and food services	11.2%
Finance and insurance, and real estate and rental and leasing	9.5%
Manufacturing	7.1%
Construction	5.5%
Other services, except public administration	5.2%
Transportation and warehousing, and utilities	4.0%
Public administration	3.6%
Wholesale trade	2.4%
Information	1.9%
Agriculture, forestry, fishing and hunting, and mining	0.3%

Source: 2014-2018 American Community Survey 5-Year Estimate

Clearwater

According to the 2014-2018 ACS, the civilian employed population 16 years and over in Clearwater was 52,313. Approximately 10,997 people were employed in the Educational services, and health care and social assistance industry with the largest percentage (21.0 percent) of people employed in Clearwater than any other industry. Women made up almost three quarters (74.2 percent) of all employed in this industry. Professional, scientific, and management, and administrative and waste was the second largest industry employing 13.9 percent of people. Men made up over half (55.2 percent) of all employed in this industry. Agriculture, forestry, fishing and hunting, and mining consisted of less than 1 percent (0.3 percent) or 133 people employed in this industry.

Table 20: Percent Employment by Industry in Clearwater - 2018

Industry	Percent
Educational services, and health care and social assistance	21.0%
Professional, scientific, and management, and administrative and waste management	13.9%
Arts, entertainment, and recreation, and accommodation and food services	13.3%
Retail trade	12.3%
Finance and insurance, and real estate and rental and leasing	8.5%
Manufacturing	6.5%
Other services, except public administration	6.0%
Construction	5.3%
Transportation and warehousing, and utilities	5.0%
Public administration	3.7%
Wholesale trade	2.6%
Information	1.7%
Agriculture, forestry, fishing and hunting, and mining	0.3%

Source: 2014-2018 American Community Survey 5-YearEstimate

Largo

According to the 2014-2018 ACS, the civilian employed population 16 years and over in Largo was 38,426. Approximately 8,095 people were employed in the Educational services, and health care and social assistance industry with the largest percentage (21.1 percent) of people employed in Largo than any other industry. Women made up almost three quarters (72.8 percent) of all employed in this industry. Retail trade was the second largest industry employing 15.1 percent of people. Men made up over half (54.7 percent) of all employed in this industry. Agriculture, forestry, fishing and hunting, and mining consisted of less than 1 percent (0.4 percent) or 153 people employed in this industry.

Table 21: Percent Employment by Industry in Largo - 2018

Industry	Percent
Educational services, and health care and social assistance	21.1%
Retail trade	15.1%
Professional, scientific, and management, and administrative and waste management	13.7%
Arts, entertainment, and recreation, and accommodation and food services	11.6%
Finance and insurance, and real estate and rental and leasing	8.3%
Manufacturing	8.2%
Construction	5.9%
Other services, except public administration	4.4%
Transportation and warehousing, and utilities	4.1%
Public administration	2.9%
Wholesale trade	2.8%
Information	1.4%
Agriculture, forestry, fishing and hunting, and mining	0.4%

Source: 2014-2018 American Community Survey 5-Year Estimate

St. Petersburg

According to the 2014-2018 ACS, the civilian employed population 16 years and over in St. Petersburg was 129,497. Approximately 31,957 people were employed in the Educational services, and health care and social assistance industry with the largest percentage (24.7 percent) of people employed in St. Petersburg than any other industry. Women made up almost three quarters (73.4 percent) of all employed in this industry. Professional, scientific, and management, and administrative and waste was the second largest industry employing 13.9 percent of people. Men made up over half (54.8 percent) of all employed in this industry. Agriculture, forestry, fishing and hunting, and mining consisted of less than 1 percent (0.3 percent) or 385 people employed in this industry.

Table 22: Percent Employment by Industry in St. Petersburg - 2018

Industry	Percent
Educational services, and health care and social assistance:	24.7%
Professional, scientific, and management, and administrative and waste management	13.9%
Retail trade	11.9%
Arts, entertainment, and recreation, and accommodation and food services	10.9%
Finance and insurance, and real estate and rental and leasing:	10.1%
Manufacturing	6.2%
Other services, except public administration	5.5%
Construction	4.5%
Public administration	4.3%
Transportation and warehousing, and utilities	4.0%
Information	1.9%
Wholesale trade	1.8%
Agriculture, forestry, fishing and hunting, and mining	0.3%

Source: 2014-2018 American Community Survey 5-Year Estimate

Largest Employers in Pinellas County

Pinellas County

The largest number of employees in the County is within local government agencies with Pinellas County, City of Clearwater, City of St. Petersburg, and City of Largo combined employing over 9,000 people. Table 23 below lists the top ten largest private employers according to Pinellas County Economic Development Department. Raymond James is the largest private employer in Pinellas County with over 4,000 employees.

Table 23: Pinellas County Top Ten Largest Private Employers

Employer	Number of Employees
Raymond James	4,000+
Home Shopping Network	2,000+
Tech Data Corp	2,000+
Spectrum	2,000+
Fidelity Information Services	1,500+
The Nielsen Company	1,500+
Jabil Circuit	1,500+
Honeywell Aerospace	1,500+
Valpak	1,500+
Superior Uniform Group	1,500+

Source: Pinellas County Economic Development Department

Pinellas County

Pinellas Suncoast Transit Authority (PSTA) provides public transportation services throughout Pinellas County, operating 47 routes, of which two are regional express routes to Tampa. In fiscal year 2019, total fixed route annual ridership was 11,663,314 and the total demand response transportation services (DART) annual ridership was 362,357. The services provided by the PSTA include bus services, bikes on buses, services for seniors, disabled, and low-income individuals as well as beach trolley services. Regional programs include express bus routes that travel from Pinellas County to The Tampa International Airport and Downtown Tampa. Additionally, PSTA provides a shuttle to East Lake PSTA, operates Suncoast Beach Trolley, Central Avenue Trolley, and trolley services are also provided by various other agencies, such as the Pinellas County Jolley Trolley, and the St. Pete Looper Trolley. The PSTA provides DART services for people who, because of their disability, are unable to independently use the regular, accessible PSTA buses; DART is provided wherever regular PSTA bus service is available. PSTA also provides 50 percent reduced fares for adult students, persons 18 years or younger, and senior citizens.

Pinellas County's Transportation Disadvantaged (TD) Program is a state-funded program, operated by PSTA, which provides low-cost transportation throughout the County to residents who qualify as "transportation disadvantaged". Transportation disadvantaged means that a person, due to physical or mental disability, age or income status, does not have transportation available or cannot purchase transportation to get access to medical treatment, life-sustaining activities (i.e., travel to grocery store, nutritional dining sites, utility companies to pay bills, social security offices, and banks); employment and education trips to help obtain or keep a job are dependent upon availability of funds. The current income guidelines for an \$11 monthly pass ranges from a family of 1 with \$1,595 per month or less income to a family size of 8 with \$5,515 per month or less of income. If bus service is unavailable to a rider's location, door-to-door service via taxi is available for \$3 per trip. The TD program also offers riders a Late Shift pass for riders who need transportation to a job that begins or ends between 10 p.m. and 6 a.m. for an additional \$9 a month. The TD program allows one Urgent Day pass a month for \$3 per trip for non-emergency, but urgent trips. PSTA also offers reduced fares for youths 18 years of age or under, adult students, senior citizens and disabled residents at \$1.10 per trip or \$35 for a monthly pass; full price fare is \$2.25 per trip or \$70 for a monthly pass.

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

When comparing the PSTA route map located at (https://www.psta.net/media/4305/psta-map-fall-2019.pdf) in relation to highly concentrated areas of public housing and poverty, the East Tarpon Springs appears to be somewhat underserved with only three north-south bus routes; one runs once per hour along Alternate Route 19 (Jolley Trolley), and a limited stop (Route 66L) along Alternate Route 19, providing a route from Tarpon Springs to downtown Clearwater, as well as a route from Tarpon Springs to Mease Dunedin Hospital and downtown Clearwater, and the third route runs along U.S. Route 19 (Route 19). The Route 19 and Route 66L provide an east-west route along Dr.

Martin Luther King Jr. Dr. and Tarpon Avenue. Although the public transit network in Pinellas County appears robust, many residents are transportation disadvantaged and have difficulty accessing transportation corridors and activity centers that provide more direct or more frequent routes. This has a direct effect on housing and employment stability. This is particularly true in central (mid-) Pinellas County where routes are also limited.

Section II: Housing Profile

Housing Characteristics

Pinellas County

The 2014-2018 American Community Survey indicated that Pinellas County had a total of 503,658 housing units, of which almost 20 percent (19.7 percent) were vacant. Single-unit structures accounted for approximately 53 percent (53.2 percent) of the total housing units, with multi-unit structures accounting for nearly 38 percent (37.5 percent) of housing units. Mobile homes and other units accounted for over 9 percent (9.5 percent) of the total housing units. Nearly 18 percent (17.6 percent) of housing units were built since 1990.

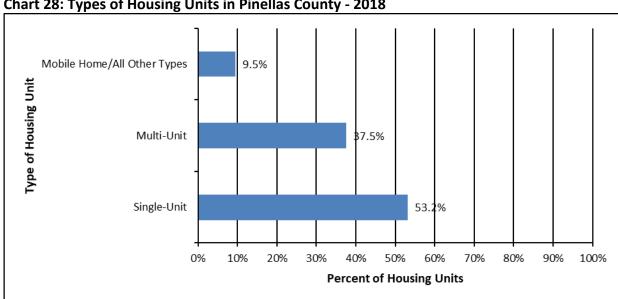


Chart 28: Types of Housing Units in Pinellas County - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Clearwater

The 2014-2018 American Community Survey indicated that Clearwater had a total of 58,103 housing units, of which almost 20 percent (19.7 percent) were vacant. Single-unit structures accounted for approximately 44 percent (43.6 percent) of the total housing units, with multi-unit structures accounting for nearly 51 percent (50.5 percent) of housing units. Mobile homes and other units accounted for nearly 6 percent (5.9 percent) of the total housing units. Nearly 17 percent (16.9 percent) of housing units were built since 1990.

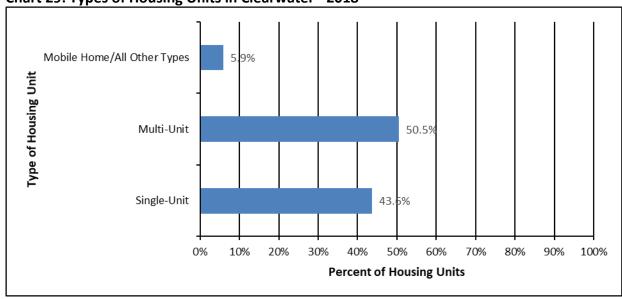
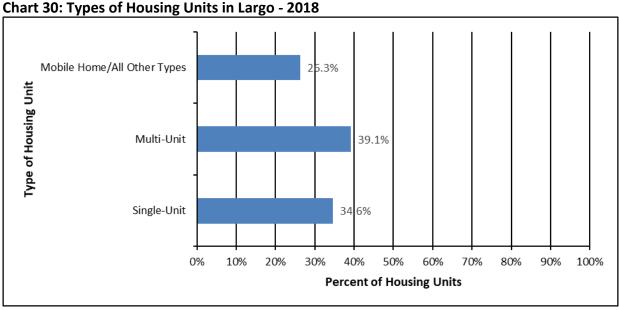


Chart 29: Types of Housing Units in Clearwater - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Largo

The 2014-2018 American Community Survey indicated that Largo had a total of 46,927 housing units, of which nearly 21 percent (20.5 percent) were vacant. Single-unit structures accounted for approximately 35 percent (34.6 percent) of the total housing units, with multi-unit structures accounting for over 39 percent (39.1 percent) of housing units. Mobile homes and other units accounted for over 26 percent (26.3 percent) of the total housing units. Over 16 percent (16.2 percent) of housing units were built since 1990.



Source: 2014-2018 American Community Survey 5-Year Estimate

St. Petersburg

The 2014-2018 American Community Survey indicated that St. Petersburg had a total of 132,622 housing units, of which over 19 percent (19.2 percent) were vacant. Single-unit structures accounted for approximately 59 percent (58.6 percent) of the total housing units, with multi-unit structures accounting for over 38 percent (38.1 percent) of housing units. Mobile homes and other units accounted for over 3 percent (3.2 percent) of the total housing units. Over 15 percent (15.3 percent) of housing units were built since 1990.

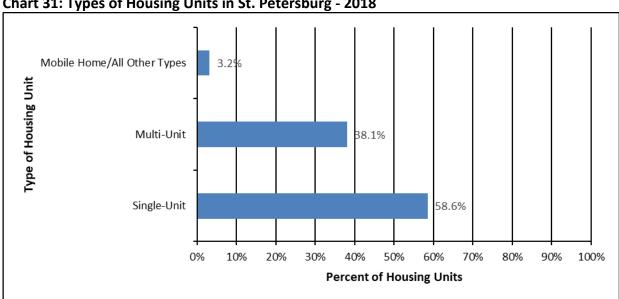


Chart 31: Types of Housing Units in St. Petersburg - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Occupied Housing Units

Pinellas County

According to the American Community Survey in 2014-2018, Pinellas County had 407,720 occupied housing units; of the occupied units, 268,015 or 65.7 percent, were owner occupied, and 139,705 or 34.3 percent were rental units. A total of 5,123 units or 1.2 percent of the housing stock is defined as substandard, meaning units that had incomplete facilities such as a plumbing or kitchen, and 2.8 percent of the households were reported to not have telephone service. Of the occupied housing units, 8.1 of percent households did not have access to a car, truck, or van for private use; approximately 45.6 percent had one vehicle, 35.5 percent had two vehicles, and 10.8 percent had three or more vehicles.

Clearwater

According to the American Community Survey in 2014-2018, Clearwater had 46,667 occupied housing units; of the occupied units, 27,019 or 57.9 percent, were owner occupied, and 19,648 or 42.1 percent were rental units. A total of 645 units or 1.4 percent of the housing stock is defined as substandard, meaning units that had incomplete facilities such as a plumbing or kitchen, and 3.7

percent of the households were reported to not have telephone service. Of the occupied housing units, 11.0 percent of households did not have access to a car, truck, or van for private use; approximately 45.7 percent had one vehicle, 32.3 percent had two vehicles, and 11.0 percent had three or more vehicles.

Largo

According to the American Community Survey in 2014-2018, Largo had 37,327 occupied housing units; of the occupied units, 21,152 or 56.7 percent, were owner occupied, and 16,175 or 43.3 percent were rental units. A total of 765 units or 2.0 percent of the housing stock is defined as substandard, meaning units that had incomplete facilities such as a plumbing or kitchen, and 4.5 percent of the households were reported to not have telephone service. Of the occupied housing units, 9.5 percent of households did not have access to a car, truck, or van for private use; approximately 52.1 percent had one vehicle, 31.0 percent had two vehicles, and 7.4 percent had three or more vehicles.

St. Petersburg

According to the American Community Survey in 2014-2018, St. Petersburg had 107,173 occupied housing units; of the occupied units, 63,027 or 58.8 percent, were owner occupied, and 44,146 or 41.2 percent were rental units. A total of 1,177 units or 1.1 percent of the housing stock is defined as substandard, meaning units that had incomplete facilities such as a plumbing or kitchen, and 2.8 percent of the households were reported to not have telephone service. Of the occupied housing units, 9.4 percent of households did not have access to a car, truck, or van for private use; approximately 44.2 percent had one vehicle, 35.9 percent had two vehicles, and 10.6 percent had three or more vehicles.

Housing Costs

Pinellas County

In the 2014-2018 American Community Survey, the median monthly housing cost for mortgaged homeowners in Pinellas County was \$1,450 with 34.1 percent of these mortgaged homeowners considered cost-burdened, meaning that they spent more than thirty percent (30.0 percent) of their household income; for non-mortgage owners, the median monthly housing cost was \$534 with 19.3 percent considered cost-burdened. For renters, the median monthly housing cost was \$1,064, and 53.3 percent of renters in Pinellas County were considered cost-burdened. Based on these percentages, 35.9 percent of housing units in Pinellas County were considered cost-burdened.

Percent of Total Cost-Burdened Units in Pinellas County Owners with Mortgage 34.1% Owners without Mortage 49.1% ■ Renters

Chart 32: Occupants with a Housing Cost Burden in Pinellas County - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Clearwater

In the 2014-2018 American Community Survey, the median monthly housing cost for mortgaged homeowners in Clearwater was \$1,457 with 33.8 percent of these mortgaged homeowners considered cost-burdened, meaning that they spent more than thirty percent (30.0 percent) of their household income; for non-mortgage owners, the median monthly housing cost was \$588 with 22.6 percent considered cost-burdened. For renters, the median monthly housing cost was \$1,052, and 59.4 percent of renters in Clearwater were considered cost-burdened. Based on these percentages, 40.9 percent of households in Clearwater were considered cost-burdened.

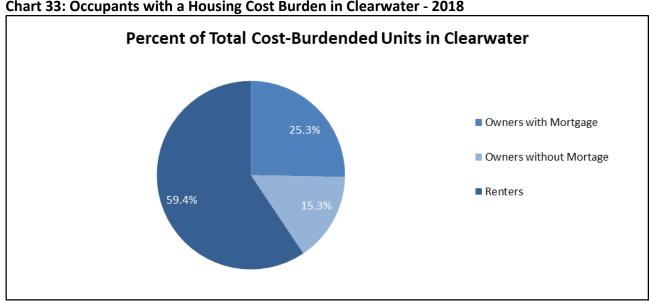


Chart 33: Occupants with a Housing Cost Burden in Clearwater - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Largo

In the 2014-2018 American Community Survey, the median monthly housing cost for mortgaged homeowners in Largo was \$1,296 with 33.9 percent of these mortgaged homeowners considered cost-burdened, meaning that they spent more than thirty percent (30.0 percent) of their household income; for non-mortgage owners, the median monthly housing cost was \$504 with 20.8 percent considered cost-burdened. For renters, the median monthly housing cost was \$1,019, and 54.8 percent of renters in Largo were considered cost-burdened. Based on these percentages, 38.7 percent of households in Largo were considered cost-burdened.

Percent of Total Cost-Burdened Units in Largo

22.5%

Owners with Mortgage
Owners without Mortage
Renters

Chart 34: Occupants with a Housing Cost Burden in Largo- 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

St. Petersburg

In the 2014-2018 American Community Survey, the median monthly housing cost for mortgaged homeowners in St. Petersburg was \$1,415 with 33.1 percent of these mortgaged homeowners considered cost-burdened, meaning that they spent more than thirty percent (30.0 percent) of their household income; for non-mortgage owners, the median monthly housing cost was \$496 with 16.0 percent considered cost-burdened. For renters, the median monthly housing cost was \$1,067, and 42.3 percent of renters in St. Petersburg were considered cost-burdened. Based on these percentages, 36.1 percent of households in St. Petersburg were considered cost-burdened.

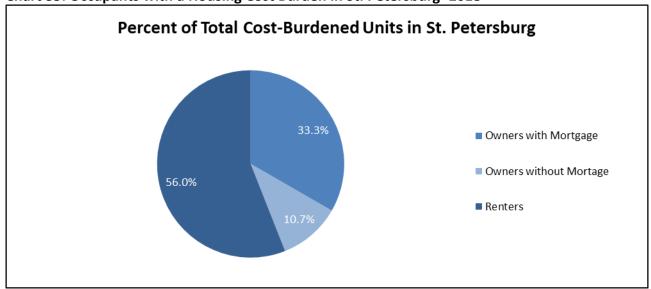


Chart 35: Occupants with a Housing Cost Burden in St. Petersburg- 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Housing Cost by Location

Pinellas County's housing market varies based on location. These distinctions can be seen in both rent and sales values. Utilizing sales and rental data from Zillow Real Estate Research, Pinellas County beach cities garner the highest prices for both sectors. At the same time, the cities with the lowest rental and sales prices are clustered around the central and southern county. As discussed previously, these areas also tend to be areas of lower income and higher concentrations of minority populations. Table 24 outlines the rent and sale prices for the various cities or areas of the County. Important to note, Zillow Real Estate Research utilizes its own methodology for determining their values, including their own boundary definitions for various cities, which may or may not match the jurisdictional boundaries of incorporated municipalities; however, this data is deemed a useful source in getting an overview of the Pinellas County real estate housing market.

Table 24: Rent and Sales Prices in Various Pinellas County Cities/Areas - 2018

City	Rent/Month	Sales Price
Belleair	\$1,938	\$402,008
Belleair Beach (33786)	N/A	N/A
Belleair Bluff (33770)	\$1,709	\$207,208
Clearwater	\$1,4109	\$190,875
Dunedin	\$1,435	\$236,183
Gulfport	\$1,504	\$194,558
Indian Rocks Beach	\$1,801	\$481,558
Indian Shores (33785)	\$1,842	\$408,583
Kenneth City (33709)	\$1,266	\$143,308
Largo	\$1,306	\$189,100
Madeira Beach	\$1,975	\$480,192
North Redington Beach (33708)	\$2,509	N/A
Oldsmar (34685)	\$1,463	\$325,533
Pinellas Park	\$1,324	\$168,750
Redington Beach	\$2,163	N/A
Redington Shores (33708)	\$1,856	N/A
Safety Harbor	\$1,359	\$272,208
Seminole	\$1,431	\$214,775
South Pasadena (33707)	\$1,564	\$211,300
St. Petersburg	\$1,410	\$193,283
St. Pete Beach	\$1,788	\$436,175
Tarpon Springs	\$1,384	\$240,050
Treasure Island	\$1,885	\$388,208
Lealman (33714; 33709)	\$1,216	\$143,308
Dansville/Ridgecrest (33778; 33774)	\$1,274	\$211,650
Highpoint (33760)	\$1,299	N/A

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

Source: Zillow; https://www.zillow.com/research/data/

For an "average" Pinellas County family of 3 (rounded down from 3.04) with a median income of \$68,522, considering housing affordability as defined by HUD as spending 30.0 percent or less of income on housing-associated costs, it is indicated that no more than \$20,567 annually or \$1,713 monthly including utilities could be spent on housing. The purchasing power of \$1,713/month translates to a home purchase price of \$190,000 to \$220,000 (depending on amount of down payment, interest rate, utilities, homeowner's insurance, and taxes), indicating that the "average" family could afford to buy or rent in many parts of the County (shaded in green on Table 24). For this estimate, utilities costs were based on Florida data from the U.S. Energy Information Administration for the year 2018 (\$128.10/month) and current Pinellas County Utilities rates for

water and sewer (assumed to be \$29.05 for water and \$42.26 for sewer, based on 5,000 gallons/month). The insurance rate was estimated to be 1.0 percent of the median home value in Pinellas County. Property taxes were also assumed to be 1.0 percent. These variables were calculated using Zillow's Affordability Calculator using a down payment range of 0 to 20 percent. It is important to note that these factors do not include other monthly household costs, including debt/loan payments, childcare, and other similar recurring expenses. This affordability estimate is based solely on housing-related expenses at 30.0 percent or less of income.

Housing Affordability for Renters

Pinellas County

Per the 2014-2018 American Community Survey, of the 507,692 housing units in Pinellas County, 27.5 percent are renter occupied. Of renter occupied units where costs could be computed, over half (53.3 percent) of renters are cost burdened, spending 30.0 percent or more of their income on housing costs. Median rent was \$1,064; however, 5,607 households reported paying no rent.

Clearwater

Per the 2014-2018 American Community Survey, of the 58,103 housing units in Clearwater, 33.8 percent are renter occupied. Of renter occupied units where costs could be computed, over half (59.5 percent) of renters are cost burdened, spending 30.0 percent or more of their income on housing costs. Median rent was \$1,052; however, 483 households reported paying no rent.

Largo

Per the 2014-2018 American Community Survey, of the 46,927 housing units in Largo, 34.5 percent are renter occupied. Of renter occupied units where costs could be computed, over half (54.8 percent) of renters are cost burdened, spending 30.0 percent or more of their income on housing costs. Median rent was \$1,019; however, 370 households reported paying no rent.

St. Petersburg

Per the 2014-2018 American Community Survey, of the 132,622 housing units in St. Petersburg, 33.3 percent are renter occupied. Of renter occupied units where costs could be computed, over half (51.3 percent) of renters are cost burdened, spending 30.0 percent or more of their income on housing costs. Median rent was \$1,067; however, 2,099 households reported paying no rent.

Housing Affordability for Homeowners

Pinellas County

According to the 2014-2018 American Community Survey, Pinellas County homeowners accounted for 52.8 percent of occupied housing units with 142,374 or 58.0 percent of them having mortgages.

Of the housing units occupied by homeowners, 26.8 percent were cost-burdened, spending 30.0 percent or more of their income on housing costs. Among those who carried a mortgage, 34.1 percent were-cost burdened as compared to 19.3 percent of those with no mortgage, yet still cost-burdened.

The median monthly housing cost for those with mortgages was \$1,450; those without mortgages spent \$534. Households with mortgages had significantly higher median incomes versus their mortgage free counterparts (\$77,774 versus \$44,962), and higher median home values (\$205,000 versus \$156,000). Several factors may play into these differences, most notably those without mortgages may be older residents who have paid off their mortgages and are more likely to occupy older homes, smaller homes, therefore potentially explaining lower values. Other explanations could account for these differences; however, considering Pinellas County's high population of those over 50 years of age, this reasoning is plausible.

Clearwater

According to the 2014-2018 American Community Survey, Clearwater homeowners accounted for 46.5 percent of occupied housing units with 14,206 or 52.6 percent of them having mortgages. Of the housing units occupied by homeowners, 28.1 percent were cost-burdened, spending 30.0 percent or more of their income on housing costs. Among those who carried a mortgage, 33.8 percent were cost-burdened as compared to 22.6 percent of those with no mortgage, yet still cost-burdened.

The median monthly housing cost for those with mortgages was \$1,457; those without mortgages spent \$588. Households with mortgages had significantly higher median incomes versus their mortgage free counterparts (\$78,109 versus \$45,466), and higher median home values (\$203,400 versus \$174,300). Several factors may play into these differences, most notably those without mortgages may be older residents who have paid off their mortgages and are more likely to occupy older homes, smaller homes, therefore potentially explaining lower values. Other explanations could account for these differences; however, considering Clearwater's high population of those over 50 years of age, this reasoning is plausible.

Largo

According to the 2014-2018 American Community Survey, Largo homeowners accounted for 45.1 percent of occupied housing units with 9,361 or 44.3 percent of them having mortgages. Of the housing units occupied by homeowners, 26.2 percent were cost-burdened, spending 30.0 percent or more of their income on housing costs. Among those who carried a mortgage, 33.9 percent were cost-burdened as compared to 20.8 percent of those with no mortgage, yet still cost-burdened.

The median monthly housing cost for those with mortgages was \$1,296; those without mortgages spent \$504. Households with mortgages had significantly higher median incomes versus their mortgage free counterparts (\$69,935 versus \$38,378), and higher median home values (\$165,700 versus \$70,800). Several factors may play into these differences, most notably those without mortgages may be older residents who have paid off their mortgages and are more likely to occupy

older homes, smaller homes, therefore potentially explaining lower values. Other explanations could account for these differences; however, considering Largo's high population of those over 50 years of age, this reasoning is plausible.

St. Petersburg

According to the 2014-2018 American Community Survey, St. Petersburg homeowners accounted for 47.5 percent of occupied housing units with 37,672 or 59.8 percent of them having mortgages. Of the housing units occupied by homeowners, 26.0 percent were cost-burdened, spending 30.0 percent or more of their income on housing costs. Among those who carried a mortgage, 33.1 percent were cost-burdened as compared to 16.0 percent of those with no mortgage, yet still cost-burdened.

The median monthly housing cost for those with mortgages was \$1,415; those without mortgages spent \$496. Households with mortgages had significantly higher median incomes versus their mortgage free counterparts (\$79,574 versus \$52,841), and higher median home values (\$192,300 versus \$166,500). Several factors may play into these differences, most notably those without mortgages may be older residents who have paid off their mortgages and are more likely to occupy older homes, smaller homes, therefore potentially explaining lower values. Other explanations could account for these differences; however, considering St. Petersburg's high population of those over 50 years of age, this reasoning is plausible.

Family Sized Housing Needs

Pinellas County

According to the 2014-2018 American Community Survey, the average household size in Pinellas County was 2.31. One-person households account for 36.4 percent of occupied units; two-person households account for 38.7 percent of occupied units; three-person households account for 12.2 percent of occupied housing units; four-or-more-person households account for 12.7 percent. For owner-occupied units, the average household size was 2.31, and 76.1 percent are one-two person households. For renter-occupied units, the average household size was 2.30, and 73.1 percent are one-two person households.

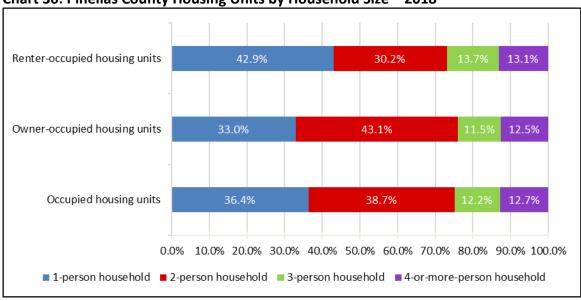


Chart 36: Pinellas County Housing Units by Household Size - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

The needs of households vary based on the size of the household. According to the 2014-2018 American Community Survey, one-bedroom units accounted for 14.0 percent of housing units. Twobedroom units accounted for 44.6 percent of housing units. Approximately 39 percent (38.5 percent), or 195,709 units, have three or more bedrooms.

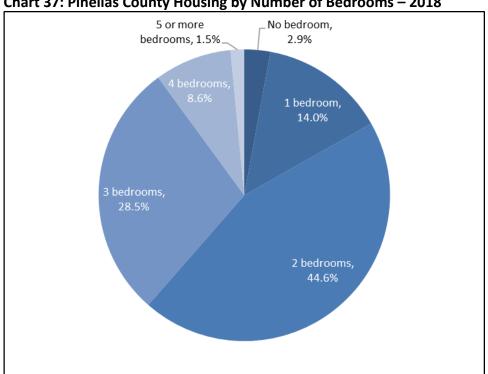


Chart 37: Pinellas County Housing by Number of Bedrooms – 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Clearwater

According to the 2014-2018 American Community Survey, the average household size in Clearwater was 2.40. One-person households account for 36.1 percent of occupied units; two-person households account for 36.6 percent of occupied units; three-person households account for 12.1 percent of occupied housing units; four-or-more-person households account for 15.1 percent. For owner-occupied units, the average household size was 2.36, and 74.5 percent are one-two person households. For renter-occupied units, the average household size was 2.45, and 70.4 percent are one-two person households.

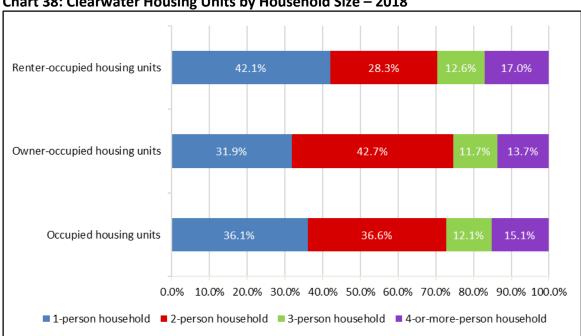


Chart 38: Clearwater Housing Units by Household Size – 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

The needs of households vary based on the size of the household. According to the 2014-2018 American Community Survey, one-bedroom units accounted for 16.1 percent of housing units. Twobedroom units accounted for 44.2 percent of housing units. Approximately 37 percent (36.5 percent), or 21,189 units, have three or more bedrooms.

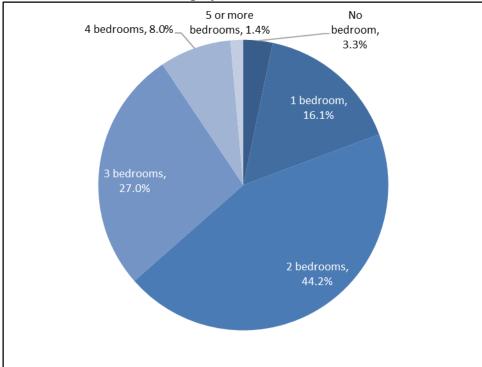


Chart 39: Clearwater Housing by Number of Bedrooms - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

Largo

According to the 2014-2018 American Community Survey, the average household size in Largo was 2.21. One-person households account for 39.1 percent of occupied units; two-person households account for 37.8 percent of occupied units; three-person households account for 12.6 percent of occupied housing units; four-or-more-person households account for 10.6 percent. For owner-occupied units, the average household size was 2.20, and 78.6 percent are one-two person households. For renter-occupied units, the average household size was 2.22, and 74.5 percent are one-two person households.

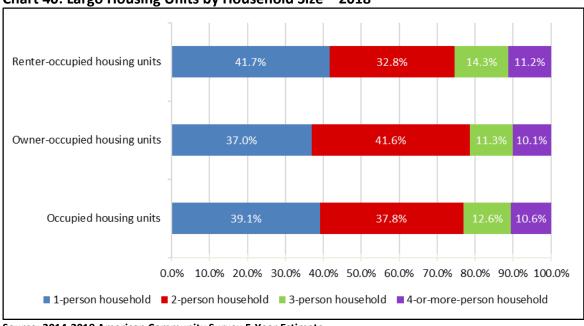


Chart 40: Largo Housing Units by Household Size - 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

The needs of households vary based on the size of the household. According to the 2014-2018 American Community Survey, one-bedroom units accounted for 18.8 percent of housing units. Twobedroom units accounted for 51.7 percent of housing units. Approximately 27 percent (26.7 percent), or 12,545 units, have three or more bedrooms.

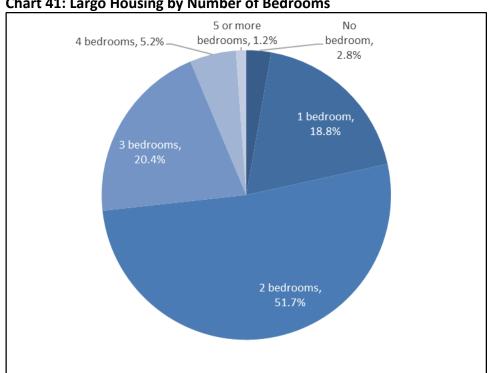


Chart 41: Largo Housing by Number of Bedrooms

Source: 2014-2018 American Community Survey 5-Year Estimate

St. Petersburg

According to the 2014-2018 American Community Survey, the average household size in St. Petersburg was 2.36. One-person households account for 37.1 percent of occupied units; twoperson households account for 36.5 percent of occupied units; three-person households account for 13.1 percent of occupied housing units; four-or-more-person households account for 13.3 percent. For owner-occupied units, the average household size was 2.42, and 72.9 percent are onetwo person households. For renter-occupied units, the average household size was 2.28, and 74.5 percent are one-two person households.

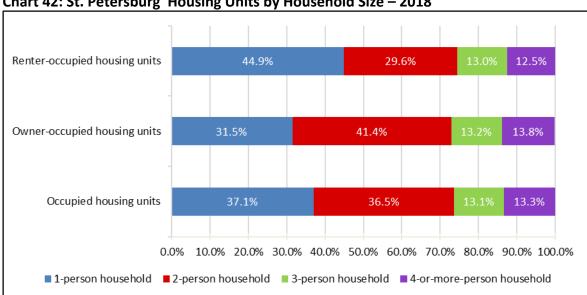


Chart 42: St. Petersburg Housing Units by Household Size – 2018

Source: 2014-2018 American Community Survey 5-Year Estimate

The needs of households vary based on the size of the household. According to the 2014-2018 American Community Survey, one-bedroom units accounted for 16.1 percent of housing units. Twobedroom units accounted for 40.7 percent of housing units. Approximately 40 percent (39.0 percent), or 51,724 units, have three or more bedrooms.

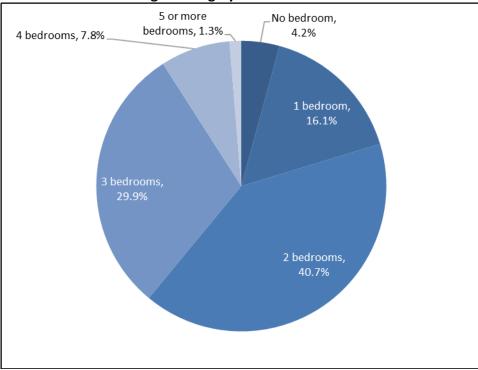
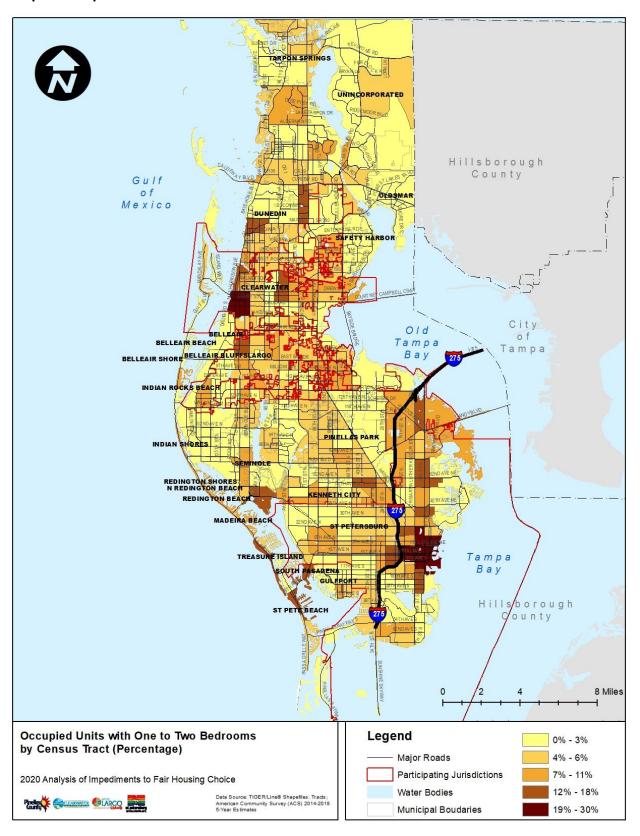


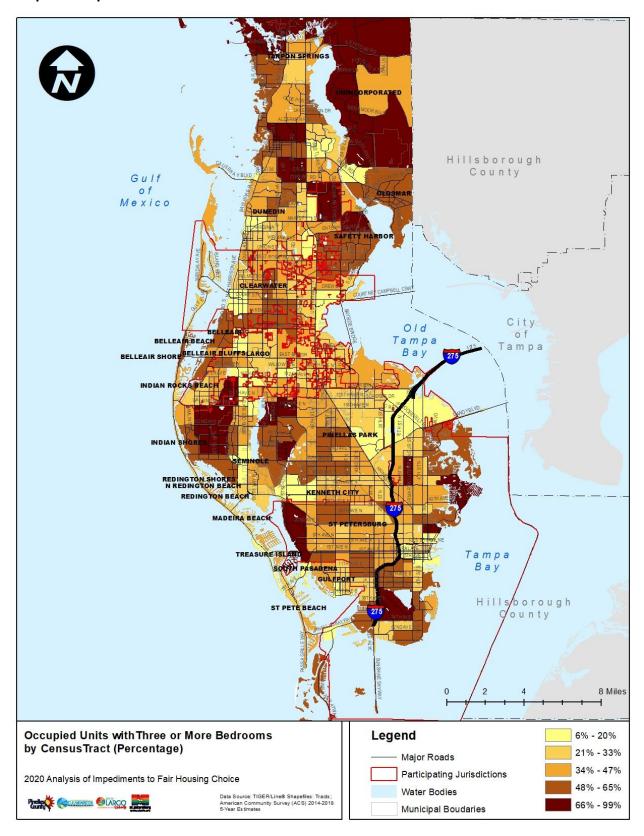
Chart 43: St. Petersburg Housing by Number of Bedrooms

Source: 2014-2018 American Community Survey 5-Year Estimate

Map 5: Occupied Units with One to Two Bedrooms



Map 6: Occupied Units with Three or More Bedrooms



Housing and Transportation Cost Burden

Pinellas County

For Pinellas County, according to the 2014-2018 American Community Survey, 78.6 percent of workers drove to work alone, while 8.0 percent carpooled. About 2 percent (1.7 percent) took public transportation; 4.7 percent used alternative means. The remaining population of 7.0 percent worked at home. The average commute time for those who commuted to work was a little over 24 (24.3) minutes. Approximately 40.4 percent of commuters experienced commutes longer than 24 minutes.

Clearwater

For Clearwater, according to the 2014-2018 American Community Survey, 73.3 percent of workers drove to work alone, while 9.4 percent carpooled. About 4 percent (3.8 percent) took public transportation; 6.6 percent used alternative means. The remaining population of 6.8 percent worked at home. The average commute time for those who commuted to work was 24.0 minutes. Approximately 38.5 percent of commuters experienced commutes longer than 24 minutes.

Largo

For Largo, according to the 2014-2018 American Community Survey, 77.1 percent of workers drove to work alone, while 9.6 percent carpooled. About 3 percent (2.6 percent) took public transportation; 4.9 percent used alternative means. The remaining population of 5.8 percent worked at home. The average commute time for those who commuted to work was 24.1 minutes. Approximately 36.3 percent of commuters experienced commutes longer than 24 minutes.

St. Petersburg

For St. Petersburg, according to the 2014-2018 American Community Survey, 78.8 percent of workers drove to work alone, while 7.5 percent carpooled. Over 2 percent (2.3 percent) took public transportation; 4.8 percent used alternative means. The remaining population of 6.6 percent worked at home. The average commute time for those who commuted to work was 23.4 minutes. Approximately 38.5 percent of commuters experienced commutes longer than 24 minutes.

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

Subsidized public housing is provided by several housing authorities functioning in the County. The four independent agencies are Pinellas County Housing Authority (PCHA), St. Petersburg Housing Authority (SPHA), Clearwater Housing Authority (CHA), and Tarpon Springs Housing Authority (TSHA). A fifth agency, Dunedin Housing Authority (DHA), exists within the County but has no active units. The services and units provided by the various agencies is included in Table 25.

Table 25: Housing Programs Provided by Housing Authority

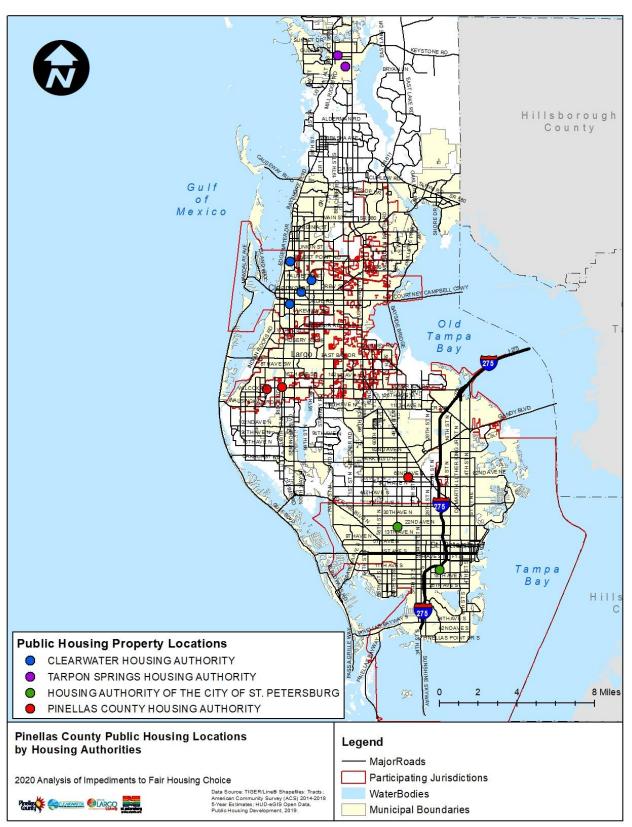
	PCHA	SPHA	СНА	TSHA	TOTAL
Public Housing	332	371	238	118	1,059
Housing Choice Vouchers (HCV)	3,692	3,612	1,340	0	8,644

Source: U.S. Department of Housing and Urban Development (HUD) PIH Information Center (PIC), Housing Authority (HA) Profiles (2020)

Each program assists Pinellas County's low-income residents with the opportunity to reside in housing which they can afford. Affordable housing is designed to provide below market priced housing for low-income residents. Public housing programs for low-income residents provide subsidies and require residents to pay 30.0 percent of their income toward the cost of the unit. Housing Choice Vouchers, also known as Section 8 Vouchers, are meant to allow low-income residents to find housing in neighborhoods and housing types of their choice by providing subsidies to the landlords. Thirty (30.0) percent of income is also required with the voucher subsidizing the remainder of the rent payment. The Veterans Affairs Supportive Housing (VASH) program is a cooperative effort between HUD and the Department of Veterans Affairs to provide housing for homeless veterans along with other services and treatment options in order for veterans and their families to gain housing independence along with solving or alleviating any underlying physical or mental issues.

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

Map 7: Locations of Public Housing Developments



Tax Exemption Analysis

As of October 4, 2019, the Pinellas County Property Appraiser had 41 total or partial exemption categories from property tax.

Of the 41 exemptions, 12 were not currently being utilized. Examples of some of the unused exemption categories are labor union education property, agreements with local governments for use of public property, historic property open to the public, space laboratories and carriers, non-for-profit water and wastewater systems corporations. Table 26 indicates the most and least commonly used tax exemptions.

Table 19: Pinellas County Tax Exemptions - 2019

Five Most Common Tax Exemptions	Number of Exemptions Claimed
Homestead Exemption - \$25,000	245,064
Additional \$25,000 Homestead Exemption	215,547
Widow's Exemption	23,078
Additional Homestead Exemption 65+	14,038
Disabled Ex-Service Member Exemption	8,691
Five Least Common Tax Exemptions	Number of Exemptions Claimed
Five Least Common Tax Exemptions Totally Disabled Veterans Confined to a Wheelchair	Number of Exemptions Claimed 13
•	•
Totally Disabled Veterans Confined to a Wheelchair	13
Totally Disabled Veterans Confined to a Wheelchair Community Center	13 8

Source: Pinellas County Property Appraiser

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

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

§196.081: Exemption for certain permanently and totally disabled veterans and for surviving spouses of veterans; exemption for surviving spouses of first responders who die in the line of duty: Total exemption from property taxes; 3,205 persons qualified for the exemption. No income requirement.

§196.091: Exemption for disabled veterans confined to wheelchairs: Total exemption from property taxes; 13 persons.

§196.101: Exemption for totally and permanently disabled persons: quadriplegic, paraplegic, hemiplegic or other totally and permanently disabled person who used wheelchair or whom was legally blind qualified: Total exemption; 270 persons.

§196.197: Charitable hospitals, nursing home and homes for special services: Total exemption; 110 qualifiers.

§196.1975: Exemption for property used by nonprofit homes for the aged: 149 qualifiers.

§196.1977: Exemption for property used by proprietary continuing care facilities: \$25,000 exemption for each apartment; 4 qualifiers.

§196.202: Property of widows, widowers, blind persons, and persons totally and permanently disabled: \$500 exemption; 23,078 widows, 5,390 widowers, 376 blind persons, and 5,110 totally and permanently disabled.

§196.24: Exemption for disabled ex-service member or surviving spouse: \$5,000 exemption for veterans disabled 10.0 percent or more during their service; 8,691 persons used the exemption.

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

§196.075: Additional homestead exemption for persons 65 and older: This exemption was expressly for low income seniors. Up to \$50,000 for any person who is 65 years of age, and whose household income does not exceed \$20,000; or (b) The amount of the assessed value of the property for any person who has the legal or equitable title to real estate with a just value less than \$250,000 and has maintained thereon the permanent residence of the owner for at least 25 years, who has attained age 65, and whose household income does not exceed the income limitation of \$30,721 (for 2020, Florida Department of Revenue); 14,038 used the first of the two exemptions. Twenty-three (23) persons used the 2nd exemption.

§196.095: Exemption for a licensed childcare facility operating in an enterprise zone: To a lesser extent, families with children could benefit from this exemption. According to the data, 4 facilities were listed under this exemption.

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

§196.1978: Affordable Housing Property. According to the data, 123 facilities benefitted from this exemption.

§196.1995: Economic development ad valorem tax exemption: Called "Parcels granted

economic development exemption" on the Pinellas County Assessment Rolls, showed 4 persons availing themselves of this exemption.

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

Based on the Pinellas County homestead exemptions alone, the estimated savings in real estate taxes range from \$500 to \$1,000 annually. Overall, it is not believed the exemptions alone would incentivize individuals to purchase a house, however it does reduce the household's overall housing expense and therefore provides an opportunity to expand their home search based on purchase price. Additionally, the reduction in housing expenses provided through tax exemptions offer the disabled and seniors the opportunity to remain in their homes.

Zoning Laws and Policies

Intro

Zoning laws and policies may have unintended negative impacts on fair housing choice. Communities are required to review these regulations to determine if they are detrimental or can be changed to help residents access housing. The zoning laws and policies of Pinellas County and the Cities of St. Petersburg, Largo, and Clearwater are fully compliant with the Fair Housing Act. There are no provisions that intentionally limit access to fair housing choice.

Pinellas County and the cities of St. Petersburg, Clearwater, and Largo continually examine zoning laws and policies to find ways to promote fair housing choice. The City of St. Petersburg has recently adopted a Tenant Bill of Rights (Ordinance No. 419-H) that outlines eviction procedures. The intent of the new ordinance is to provide a legal framework for the eviction process. The policy does not create unreasonable burdens on property owners—it provides clear direction on the exact legal procedure for an eviction and clarifies what types of late fees are legal. Tenants are still required to pay rent in a timely manner, and they may still be evicted for cause, but they may not be subject to arbitrary, unlawful fees or inadequate notice of eviction. The policy will provide some relief to tenants so they may remain in their rental unit. Evictions are a leading cause of homelessness and disproportionately affect African American households, which impacts access to fair housing.

The County and its partners also adopt Local Housing Incentives Strategy (LHIS) plans as part of the State Housing Initiative Partnership (SHIP) program. These plans incorporate incentives for affordable housing, which in turn impacts fair housing choice. The adoption of this policy requires jurisdictions receiving SHIP funds to regularly review zoning laws and policies to review their impact on affordable housing and, in turn, fair housing choice. The incentive plans encourage density bonuses, expedited permitting, parking allowances, accessory residences (mother-in-law units), land banking, transit, code-foreclosed properties, property acquisition, and other actions.

Pinellas County and its partners are particularly concerned with incentivizing affordable housing

development along transportation corridors. The County is working with municipalities to link new affordable housing to major employment centers, which are dispersed throughout the community. The cities of Clearwater, St. Petersburg, and Largo are the primary economic drivers in Pinellas County with thriving downtown and commercial districts. By encouraging higher-density development along transportation corridors, low income residents will be able to better access employment opportunities and social services.

Pinellas County

Affordable housing barriers can result from well-meaning activities that are not intended to affect the cost of housing but do. This includes actions such as setback requirements for public safety purposes, landscaping requirements to beautify areas, and density limitations for transportation impact mitigation. Several factors exist in Pinellas County that impede the development of affordable housing. Government review processes prolong development timelines resulting in increased per unit housing development costs. Impact fees, charged to defray the cost of constructing and maintaining water, sewer, and transportation systems, can increase the costs of single and multifamily developments approximately 4 to 5 percent. Although, some impact fees under Section 163.31801(8), Florida Statutes (F.S.) may be waived by local governments for projects that qualify as affordable housing. Zoning and land use codes can restrict unit density, impacting the supply of affordable housing. These policies, although enacted to protect general public welfare, hinder the development of affordable housing.

In order to offset these barriers, Pinellas County established an Affordable Housing Incentive Program to provide private sector builders and developers with regulatory and financial incentives to produce affordable housing. In 2018, Pinellas County adopted Ordinance No. 18-36, which provides standards and incentives for affordable housing developments (AHD). The purpose is to allow AHDs throughout the county while ensuring compatibility to the surrounding context and providing certain incentives. The development standards for affordable housing in Pinellas County include the flexibility of housing types and density with limitations. Incentives for affordable housing include density bonuses, lot size requirement reductions, setback requirement reductions, on-site parking requirement reductions, expedited review process, waving of review fees, zero lot line configuration, street design modifications, donation of publicly owned land, assistance identifying qualified buyers or renters, and the ability to redevelop nonconforming mobile home parks. The applicability of all the identified incentives are determined on a per development basis. Affordable housing developments must be approved to receive the mentioned incentives.

Clearwater

Clearwater provides affordable housing incentives to encourage the development of affordable housing. These incentives include density bonuses which allow for developments that designate at least 15 percent of their units as affordable housing can be awarded a density bonus of an additional 25 percent of the existing density allowed based on the future land use classification. Furthermore, developments that designate at least 25 percent of their units as affordable housing can be awarded a density bonus of an additional 50 percent of the existing density allowed based on the future land use classification. Additionally, there are reduced off-street parking standard incentives for affordable housing units. Along with the affordable housing incentives, Clearwater has design

standards for affordable housing developments to ensure compatibility with surrounding developments and standards to ensure the affordability of housing other owner-occupied and rental units are maintained.

Largo

To encourage the development of affordable housing, Largo provided standards and incentives for Affordable Housing Developments (AHDs) intended to implement Ordinance No. 94-08. The City's code provides criteria for AHD designation to ensure that units remain affordable, have quality design and comparable unit size, that enough affordable units are made available, and that the placement of AHDs are within the right districts. The incentives made available for AHDs in Largo include impact fee and development permit fees being paid by the City through State Housing Incentive Partnership (SHIP) funding, density bonuses, and alternative development standards that can be applied to reduce construction and site preparation costs. The City also provides CDC provisions which support ADHs. Properties receiving an AHD designation are subject to covenants and restrictions running with the land for a period of five years and anyone who buys a lot must comply with the land use restriction agreement. Largo's code also provides AHD program management guidelines that provide detailed responsibilities of property owners and managers, tenants, developers/builders, and homeowners to ensure that units remain affordable and in compliance with AHD requirements.

St. Petersburg

To increase the availability of affordable housing units and eliminate substandard housing, St. Petersburg has a local housing assistance program. The City is authorized to acquire a substandard property, demolish and/or construct new housing, rehabilitate it and sell it to a qualified purchaser. The City can also use funds and services to assist developers of new or renovated multifamily housing projects that are part of a mixed-income or mixed-use development. The City also has a workforce housing density bonus program which includes exemptions from Floor Area Ratio calculation limitations. The City's code provides standards for the development and classification eligibility of workforce housing units and guidelines to control the affordability of these units. In 2019, the City of St. Petersburg also adopted new zoning standards for "missing middle" housing types which supports accessory dwelling units and moderate density (e.g. duplex, triplex, quadplex, townhome) housing options as a bridge between single-family and high-density multi-family housing types.

Section III: Evaluation of Fair Housing Legal Status

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

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

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

The PCOHR employs Equal Opportunity staff members who are responsible for providing fair housing education/outreach, training and awareness initiatives. The PCOHR is responsible for the intake, investigation and resolution of fair housing complaints to fulfill the HUD requirements for the operation of a "Substantially Equivalent Fair Housing Program".

Enforcement and Litigation

Pinellas County and its incorporated communities are fortunate to have an organization dedicated to fair housing issues: The Pinellas County Office of Human Rights (PCOHR). The PCOHR works with residents, landlords, property managers, real estate professionals, and the community at large to provide fair housing education and, if necessary, enforcement of fair housing laws. PCOHR is funded through the County and operates in all incorporated municipalities in Pinellas County.

PCOHR actively collects data on enforcement activity. Residents of Pinellas County with fair housing issues file a complaint with PCOHR, which logs the complaint and opens an investigation. The results of the investigation may lead to dismissal, a negotiated settlement, or prosecution.

Data from the last four years indicate several stark statistics. Under "Bases for Complaints", a huge proportion, 55 percent, is related to disability (Complainants may select multiple categories of complaints, so the total of 400 bases of complaints does not represent 400 unique cases). The second highest category is race, at 23 percent of complaints. The most common alleged issues cited

were differences in terms and conditions (Unequal treatment) and failure to provide reasonable accommodation/modification, at 37 percent and 28 percent, respectively (As with the bases for complaints, complainants may identify multiple alleged issues, so the total number of alleged issues does not reflect the total number of cases).

Following is a summary of PCOHR's enforcement activities over the last four years.

Table 27: PCOHR Case Load Summary: 2015 through 2018

Table 27: PCOHR Case Loa	2015-2016	2016-2017	2017-2018	2018-2019	Total for Four
					Year Period
Number of Cases					
New cases	81	41	66	75	263
Cases processed to	74	45	57	64	240
closure during the fiscal					
year, including cases					
from prior years					
Reasonable cause	8	4	3	4	19
determined					
Reasonable cause cases	5	3	9	10	27
remaining open from					
previous fiscal years	26	4.6	40	24	422
"No Reasonable Cause"	26	16	49	31	122
determinations made	2.5	1.5	10	20	90
Cases successfully conciliated	35	15	19	20	89
Cases withdrawn with	5	13	6	12	36
settlement	J	13	U	12	30
Cases reactivated by	3	0	0	1	4
HUD					
Cases closed after a	0	1	0	0	1
ruling by an					
Administrative Law					
Judge	20	0	0	•	4.5
Cases in open status	20	8	8	9	45
Bases for Complaints	_	_	-	_	
Race	25	12	42	12	91
Sex	5	2	2		9
Familial Status	4	2	1	5	12
Disability	62	42	44	73	221
Retaliation	12	4	2	2	20
Sexual Orientation	1	1	0	1	3
Color	1	2	0	0	3
Religion	1	1	0	4	6

	2015-2016	2016-2017	2017-2018	2018-2019	Total for Four Year Period
National Origin	15	1	8	5	29
(Complaints may have multiple bases.)					
Complainants Alleged					
Issues					
Failure to provide reasonable accommodation/modifi cation	62	28	42	60	192
Differences in terms and conditions (Unequal treatment)	83	47	66	58	254
Failure to rent/sell	18	15	27	14	74
Retaliation, Harassment, Intimidation, and coercion	38	15	16	16	85
Discriminatory advertising/statements	13	2	0	0	15
Steering	2	0	0	0	2
Otherwise deny housing	24	20	8	14	66

Source: Pinellas County Office of Human Rights

The largest share of complaints is based on disability. It is often assumed that disability complaints concern modifications to rental units for reasonable accommodation (handicap ramps, grab bars, etc.). However, within the category of disability complaints in Pinellas County, most center on service animals. It is of such concern that education about reasonable accommodation for service animals was identified as a fair housing strategy in the prior Analysis of Impediments study, as it will be in this study. Educating landlords about service animals is among the most pressing needs based on the case load reports of PCOHR. The County hopes that continued fair housing education will alleviate these cases before they get to the point of a complaint.

Race is the next highest category of complaints at 91 over a four-year period. As with disability, the County will continue to identify race-based discrimination as an impediment to fair housing choice.

Resolution of Complaints

PCOHR resolved a number of fair housing complaints over the last four years, as indicated in Table 28.

Table 28: Fair Housing Complaint Resolutions

Number of Cases	2015-2016	2016-2017	2017-2018	2018-2019	Total for Four Year Period
Cases successfully conciliated	35	15	19	20	89
Cases withdrawn with settlement	5	13	6	12	36
Cases reactivated by HUD	3	0	0	1	4
Cases closed after a ruling by an Administrative Law Judge	0	1	0	0	1

As indicated in Table 28, 68 percent of complaints over a four-year period were conciliated (mutual agreement on resolution of the complaint). Settlements were achieved in 28 percent of cases. In rare cases, the matter is escalated by HUD or submitted to administrative law proceedings. These actions represent about 4 percent of all cases.

Fair Housing Complaints Sum of Fields Disability Race Sex Hills National Origin Retaliation Gulf o f Familial Status Mexico Religion Sexual Harrassment Sexual Orientation Gender No basis specified City Old o f Tampa Tampa BELLEAIR SHORE Вау REDINGTON SHORES REDINGTON BEACH MADEIRA BEACH Tampa SOUTH PASADENA Bay Hillsborough ST PETE BEAC ounty 8 Miles **Fair Housing Complaints** Fair Housing Complaints by Type by Zipcode Legend Fiscal Year 2016 through Fiscal Year 2020 0 - 1 Major Roads 2 - 5 Participating Jurisdictions 2020 Analysis of Impediments to Fair Housing Choice 6 - 10

Data Source: TIGER/Line® Shapefiles: Tracts; American Community Survey (ACS) 2014-2018 5-Year Estimates; Pinellas County Office of Human Rights

Water Bodies

Municipal Boudaries

11 - 15

16 - 21

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

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Pinellas County-Tampa MSA Foreclosures

Over the last five years, Pinellas County recorded 13,759 foreclosures. The trend from 2015 to 2019 indicates a reduction in foreclosures of 41 percent, which is clearly a positive and substantial trend. The peak of foreclosures over the last 12 years was 15,164 in FY 2008, which corresponds to the onset of the housing crisis. The 2019 figure of 2,141 foreclosures represents an 86 percent reduction from the height of the housing crash in FY 2008. The continued downward trajectory of foreclosures is a positive housing indicator for Pinellas County that indicates a stable mortgage market. It may also be indicative of a more conservative lending environment that has significantly tightened credit requirements for lending. Rising home prices paired with stricter lending requirements tend to select a higher-income, lower risk pool of homeowners. While this improves foreclosure rates, it also serves to restrict the low-income population's access to mortgage products.

Table 29: Pinellas County Foreclosure 2015-2019

Year	Number of Foreclosures*
2015	3,657
2016	3,060
2017	2,315
2018	2,586
2019	2,141
TOTAL	13,759

Source: Pinellas County Clerk of the Circuit Court and Comptroller, Mortgage Foreclosures Recorded

As indicated in Table 29, foreclosures fell substantially from 2015 to 2019. Table 30 shows foreclosure rates by month for the years 2015 through 2019. The most active month for foreclosure filings is May, with November having the lowest number of foreclosures.

Table 30: Pinellas County Foreclosures by Month: 2015 through 2019

YEAR	Jan	Feb	March	April	May	June	July	Aug	Sep	Oct	Nov	Dec
2015	298	287	310	348	291	332	362	331	273	285	259	281
2016	270	256	336	285	313	287	281	254	238	182	175	183
2017	239	197	240	195	278	253	202	295	96	115	96	109
2018	150	187	243	207	284	296	195	241	177	210	204	192
2019	205	237	174	225	189	148	189	153	148	163	153	157
Total	1,162	1,164	1,303	1,260	1,355	1,316	1,229	1,274	932	955	887	922

Source: Pinellas County Clerk of the Circuit Court and Comptroller, Mortgage Foreclosures Recorded

Section IV: Community Outreach and Engagement

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

Four (4) fair housing forums with residents were held on the following dates: October 29, 2019, at the Lealman Exchange (5175 45th St. N., St. Petersburg, FL), on November 4, 2019, at the Largo Public Library (120 Central Park Dr., Largo, FL), on November 12, 2019 at the Tarpon Springs Public Library (138 E. Lemon St., Tarpon Springs, FL), and on March 3, 2020 at the St. Petersburg Main Library (3745 9th Ave. N., St. Petersburg, FL). Additionally, one housing focus group meeting was held on November 4, 2019, at the Largo Public Library (120 Central Park Dr., Largo, FL). Participants in the focus group meeting included staff from the cities and County, including the City of Largo Housing Division, Pinellas County Office of Human Rights, a YMCA representative, and the general public. Surveys (online and paper) were available to the attendees during the community outreach campaign in October and November 2019.

In an effort to provide an environment that would allow for all attendees to be heard, a three-tier approach was conducted. The first was to present an educational PowerPoint that explained the purpose of the 2020-2024 Consolidated Plan and 2020/2021 Action Plan for federal grant programs, introduced the Consolidated Plan process, introduced the countywide 2020 Analysis of Impediments to Fair Housing Choice process, provided education regarding the Fair Housing Act, and introduced opportunities for participation in these planning processes. The second was a paper and online survey asking the participants about known housing needs, Fair Housing concerns, and community development priorities in Pinellas County and its participating cities. The third was an open discussion where the participants were asked to identify issues/concerns related to affordable housing and Fair Housing in Pinellas County, and to identify priority housing needs and contributing factors to Fair Housing issues.

Discussion in the fair housing focus group meetings spanned numerous issues, but the following issues were voiced repeatedly:

- Persons with support animals are discriminated against in housing that does not allow animals.
- Persons with criminal records are often discriminated against and have very limited, if any, options for housing.
- Persons fleeing domestic violence have limited options for removing their financial responsibility related to the housing they left behind.
- There needs to be better education and "testing" about Fair Housing among rental property landlords, adult communities (e.g. 55+), and condo and homeowner's associations, as well as resources for people in need of housing assistance
- Eviction needs to be addressed, particularly regarding Fair Housing issues.
- Strategies such as ordinances are needed to expedite and improve acceptance of other sources of income (e.g. vouchers) for housing.
- Families, particularly single-parent families, struggle to find affordable housing because

larger housing units are more expensive, and many families do not meet the minimum family size requirements to afford such units.

- The lack of availability of land is a major obstacle for increasing housing inventory in Pinellas County.
- Diversity of housing options (e.g. accessory dwelling units, quadplex, etc.) within existing neighborhoods is needed to discourage flipping, reduce concentrations of lower income units, and improve price range/affordability.
- More funding and subsidies are needed to make affordable housing realistic.
- Collaboration between entities is needed to streamline the process and standards for affordable housing.

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

There were 45 participants that attended the Fair Housing Forums and 28 participants that attended the Fair Housing Focus Group. In total, there were 108 surveys taken either online or turned in at the Fair Housing Forums and Focus Groups. See the Appendix for more information regarding the public meetings and survey.

Section V: Impediments to Fair Housing

Actions to Address Previous Found Impediments

Pinellas County has been actively working to address previous impediments to Fair Housing. Prior to this updated analysis, the County issued the Pinellas County FY 2016-2017 Analysis of Impediments to Fair Housing Choice. The prior analysis identified a number of impediments and recommended actions. The following is a summary of the prior impediments and actions taken by the County and its partners.

Impediment: Areas of Discrimination

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

A. Discrimination with regard to home mortgage loans.

Recommended Action:

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

Response

The PCOHR is the organization in the County that enforces fair housing choice by receiving complaints, opening cases, working to resolve cases, and providing outreach to the community. The PCOHR provides frequent training to real estate professionals, including bankers and mortgage brokers. These education efforts are regularly scheduled and designed to educate housing finance professionals on fair housing issues, local fair housing concerns, federal regulations and resolving issues.

A summary of PCOHR community engagement efforts is found later in this section.

In addition, Pinellas County, the City of St. Petersburg, the City of Clearwater and the City of Largo are members of the Tampa Bay Fair Housing Consortium. As such, the County supports the efforts of the Consortium and participates in education activities relating to protected classes and topics

such as implicit bias, basic fair housing policy, sexual harassment in housing, and diversity.

B. Discrimination of nationality and locally protected classes

Recommended Action:

- Allocate County resources to sustain and expand awareness, education, and training opportunities to landlords, property manager, and Realtors; concerning national and local housing discrimination laws and policies, with a particular focus in the area of discrimination related to services animals.
- Improve presentation to housing providers regarding their obligations and responsibilities in the areas of reasonable accommodations for those with disabilities; including Homeowners Associations and Condominium Owners Associations, and other communal housing providers.
- Continue to contractually require non-discrimination against race, color, religion sex, disability, familial status, and national origin, for all program participants and subrecipients.

Response

PCOHR enforces fair housing policy in the County by providing community outreach and processing fair housing complaints. The Office has recorded numerous complaints based on nationality and protected classes and investigates all complaints.

A summary of all complaints for the prior four years is summarized in Table 31.

Table 31: PCOHR Training and Outreach Activities

Year	Number of Events: Training and Outreach	Number of Trainees
2016	12	1,051
2017	24	1,708
2018	10	660
2019	29	1,274
2020	9	729
TOTAL	84	5,422

Another way the County enforces fair housing requirements is through the inclusion of the required clauses regarding fair housing and protected classes in all contracts with vendors and partners.

C. Competency in Fair Housing Policy

Recommended Action:

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

Response

The Pinellas County Office of Human Rights, the Tampa Bay Fair Housing Consortium, and the local jurisdictions of St. Petersburg, Largo and Clearwater provide all housing materials in multiple languages, as required. The PCOHR provides ongoing, year-round training on fair housing choice in Pinellas County.

Table 32: PCOHR Training and Outreach Activities

<u></u>						
Year	Number of Events: Training and Outreach	Number of Trainees				
2016	12	1,051				
2017	24	1,708				
2018	10	660				
2019	29	1,274				
2020	9	729				
TOTAL	84	5,422				

Impediment: Areas of Limited Opportunity

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

A. Transportation-Burdened Areas

Recommended Action

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

Response

The County and its partners have worked with the Pinellas Suncoast Transportation Authority to link fair housing opportunities with geographic areas of social services and employment. The County commits to find ways to address these concerns through adoption of the Affordable Fair Housing Plan, which is required of all SHIP recipients.

B. Income Barriers

Recommended Action

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

Response

Pinellas County and the cities of St. Petersburg, Clearwater and Largo have provided millions of dollars in CDBG, HOME, ESG, NSP funds, State SHIP, and local funding to provide housing opportunities to low- and moderate-income households. The County will continue to fund these programs and provide housing opportunities to the community.

Impediment: Condition of Housing Stock

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

A. Age of Housing

Recommended Action

- Continue providing affordable housing units for rent or home ownership through the use
 of Federal CDBG, HOME, ESG, and NSP funds, State SHIP and local Housing Trust Funds.
 Current priorities include acquisition, construction and/or rehabilitation of new and/or
 existing owner, rental, homeless and special needs housing.
- Continue mentoring services to affordable housing partners including developers, banking institutions, employers and other to identify available incentives for building new affordable units.
- Continue to work in target areas including the Greater Ridgecrest Area (including Dansville), Highpoint, Central and East Lealman, and Tarpon Springs to build new, affordable single-family homes.

Response

Pinellas County and the Cities of St. Petersburg, Clearwater and Largo have provided substantial resources for the renovation of housing, provision of new affordable housing units and mentoring services to housing providers. Housing funds are provided to all people who are eligible assuming the availability of funds.

Target areas, such as CRAs, are geographic areas of slum and blight that receive tax increment financing (TIF). These areas are in developed districts with older housing stock. The TIF funding, in addition to housing funding for residents, promotes redevelopment and improves the CRA neighborhoods.

B. Access to Home Improvement Loans

Recommended Action

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

Response

Pinellas County and the cities of St. Petersburg, Clearwater and Largo have provided substantial resources for rehabilitation and down payment assistance to residents. The housing stock in Pinellas County is generally over 50 years old, so funds will continue to be provided to assist residents and development partners with housing rehabilitations.

Revitalization Areas in Pinellas County

Pinellas County and its incorporated communities have a wealth of active, innovative Community Redevelopment Areas (CRAs) that have brought significant and transformational change to the community. CRAs are authorized under Florida Statutes to provide a reliable stream of tax revenue to address conditions of blight and poverty within geographically delineated boundaries.

CRAs are registered through the Florida Department of Economic Opportunity (DEO), and the following are active CRAs in Pinellas County:

- City of Tarpon Springs Community Redevelopment Agency (Downtown)
- Clearwater Community Redevelopment Agency (Downtown)
- Dunedin Community Redevelopment Agency (Downtown)
- Gulfport Forty-Ninth Street Corridor Redevelopment District
- Gulfport Waterfront Community Redevelopment Agency
- Largo Community Redevelopment Agency (West Bay/Clearwater-Largo Road)
- Oldsmar Community Redevelopment Agency (Oldsmar Town Center)
- Lealman/Pinellas County Community Redevelopment Agency
- Pinellas Park Community Redevelopment District (Downtown)
- Safety Harbor Community Redevelopment Agency (Downtown)
- St. Petersburg Community Redevelopment Agency (South St. Petersburg, Intown; and Intown West)

Community Reinvestment Act

The Community Reinvestment Act (CRA) is a 1977 law that requires the Federal Reserve and other federal banking regulators encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate-income (LMI) neighborhoods.

There is another program that is known by the CRA acronym: Community Redevelopment Areas (CRAs). These are geographic areas of need recognized by the local government and the State of Florida. This program is distinct from the Community Reinvestment Act. The CRAs are discussed in greater detail under Revitalization Areas (the previous section).

There are three federal banking agencies that are responsible for the CRA: Federal Deposit Insurance Corporation (FDIC); Federal Reserve Board (FRB); and Office of the Comptroller of the Currency (OCC).

Banks that have CRA obligations are supervised by one of these three regulators. Each regulator has a dedicated CRA site that provides information about the banks they oversee and those banks' CRA ratings and Performance Evaluations.

Member banks are examined by the Federal Reserve to ensure compliance by: examining state member banks to evaluate and rate their performance under the CRA; considering banks' CRA performance in context with other supervisory information when analyzing applications for mergers, acquisitions, and branch openings; and sharing information about community development techniques with bankers and the public.

Pinellas County and the incorporated cities coordinate with CRA banking institutions to help these lending institutions meet their obligations under the CRA.

Home Mortgage Disclosure Act (HMDA)

Analysis Introduction

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

Analysis

One of the data sources reviewed for the Analysis of Impediments to Fair Housing Choice study is derived from the Home Mortgage Disclosure Act (HMDA) data. The act was passed by Congress in 1975 because of concerns that urban areas were being starved of bank financing. HMDA requires financial institutions to maintain, report, and publicly disclose detailed loan-level information about mortgages. HMDA enforcement and data collection resides under the Consumer Financial Protections Bureau. The identity of individuals and property addresses are not disclosed in this analysis, although data can be tabulated by specific lenders if there is a concern about discrimination.

Data from the reporting institutions is correlated with census data to discern patterns of lending in every community in America. The census data in the HMDA database is organized by Census Tracts, Counties, MSAs (Metropolitan Standard Areas), and states. Summary queries are organized by MSAs. HMDA data do not distinguish municipal boundaries because such boundaries often cross census tracts and frequently change.

Specific queries can also be made by individual financial institutions for a geographic area. This level of detail is instrumental if there is suspicion that a specific institution may be engaged in discriminatory practice. Fair Housing regulations do not, however, address income disparity or the cost of housing, and certain lenders have stricter lending standards based on income and assets.

This analysis uses 2018 data for Pinellas County and the Tampa/St. Petersburg/Clearwater MSA. The data reviewed describe originated loans (which are loans that were approved and closed) and denied loans. Some aspects of the analysis consider other types of loan decisions (Applications Withdrawn, Incomplete, Approved but Not Accepted). When this data is incorporated into an analysis, the ratio of loan originations drops. Loans Denied reflects loans with completed applications and back up that were later denied, and using this data alone drive approval ratios higher because only the most complete applications are considered. Finally, the HMDA data capture different decision points and types of loan products, but for purposes of this analysis and clarification the data are summarized.

HMDA does not prove wrongdoing by financial institutions. It is a tool that uses data to draw attention to trends and patterns by demographic characteristics. Outliers in the data do not mean there is discrimination in lending practices. Rather, it is more akin to a warning light on the dashboard that

calls attention to something that may or may not be significant. Communities that suspect violations of fair housing, whether intentional or not, can use HMDA data to support further investigation into problem areas.

Loan Approvals by Race and Ethnicity

One of the core functions of HMDA analysis is race. In Pinellas County, 59 percent of African Americans were approved for a mortgage among applicants that completed applications. White applicants were approved at a rate of 73 percent. This is a variance of 14 points between the two categories of applicants. The prior impediments study (which complied data from 2007 to 2013) showed African Americans obtaining mortgages at a rate of 48 percent, versus 70 percent for white applicants. This is a variance of 22 points between these two racial categories. The recent data, therefore, indicates higher rates of approval for both races and a narrowing gap between them.

Certainly, this is encouraging progress, but nonetheless the gap remains. The prior study uses data from the height of the Great Recession, and so higher rates of denial may be reasonably explained. Current lending standards can be generalized as being much more stringent than prior to 2008, so applicants who achieve loan origination may be overall more qualified applicants than their earlier cohorts.

It should be noted that although the rate of approval for African Americans is 59 percent, the volume of African Americans applying for mortgages in Pinellas County is very low. Among a universe of about 40,000 applicants for 2018, only 1,454 were African American. Assuming an African American population of 10 percent, a proportionate number of loan applicants would be about 4,000, or 2.75 times as many as actually applied. This may be reasonably construed as a problem that reflects lower incomes for African American populations and access to mortgage markets. The HMDA data do not prove discrimination, but they do indicate the exclusion of a large segment of the population to mortgage products.

Hispanic rates of approval are 66 percent, which is higher than the previous impediments study that indicated a 60 percent approval rate. It is important to note that Hispanics are categorized in the census as an ethnicity, not a race. Therefore, the Hispanic data are a subset of racial data, not in addition to racial data. The majority of Hispanics identify as White Hispanics and are included in that racial category.

Of interest is that Asian rates of loan origination, 64 percent, have not changed from the prior study.

Table 33: Pinellas County Rates of Loan Originations by Race

Race	Loans Originated	Application Denied	Total*	Percent Approved
American Indian or	65	56	121	54%
Alaska Native				
Asian	683	381	1,064	64%
Black or African	856	598	1,454	59%
American				
Native Hawaiian or	36	37	73	49%
Other Pacific Islander				
White	22,639	8,585	31,224	73%
2 or More Minority	33	16	49	67%
Races				
Joint	379	150	529	72%
Free Form Text Only	0	6	6	0%
Race Not Available	3,462	1,654	5,116	68%
TOTAL APPLICANTS	28,153	11,483	39,636	71%
Ethnicity	Loans Originated	Application Denied	Total*	Percent Approved
Hispanic or Latino	1,412	742	2,154	66%
Not Hispanic or Latino	22,526	8,862	31,388	72%
Joint	546	227	773	71%
Free Form Text Only	8	12	20	40%
Ethnicity Not Available	3,661	1,640	5,301	69%
TOTAL APPLICANTS	28,153	11,483	39,636	71%

The Tampa Bay MSA encompasses Pinellas and Hillsborough County. When compared to Pinellas County as a whole, the Tampa Bay MSA exhibits much lower rates of approval across all racial and ethnic categories. The total rate of approval of 71 percent is consistent because white households comprise the largest cohort of applicants by a wide margin.

Table 34: Tampa Bay MSA Rates of Loan Originations by Race

Race	Loans Originated	Application Denied	Total	Percent Approved
American Indian or	255	197	497	51.31%
Alaska Native				
Asian	2,734	1,235	5,124	53.36%
Black or African	5,161	2,842	10,366	49.79%
American	,,,,,,	_,	_5,555	.5.7.576
Native Hawaiian or	162	162	423	38.30%
Other Pacific Islander				
White	65,965	23,997	113,667	58.03%
2 or more minority	100	66	214	46.73%
races				
Joint	1,478	530	2,620	76.18%
Free Form Text Only	9	12	26	34.62%
Race Not Available	10,374	5,381	21,427	48.42%
TOTAL	86,756	34,422	154,364	56.20%
Ethnicity	Loans Originated	Application Denied	Total	Percent Approved
Hispanic or Latino	10,580	5,206	15,786	67.02%
Not Hispanic or Latino	63,050	23,549	86,599	72.81%
Joint	2,244	818	3,062	73.29%
Free Form Text Only	17	26	43	39.53%
Ethnicity Not	10,347	4,823	15,170	68.21%
Available				
TOTAL	86,238	34,422	120,660	71%

Concentrations of African Americans in Pinellas County Census Tracts

The African American population of Pinellas County is about 10 percent. When reviewing HMDA data, a sort of census tracts was conducted that selected census tracts with African American populations that were 20 points or more above the County average. The result is a list of 20 census tracts that are 30 percent or more African American. The data also includes other loan actions, such as loans withdrawn or files closed for incompleteness. Of interest is that these census tracts have an approval rate of 66 percent, which is higher than census tracts without concentrations of African Americans, but still lower than white applicants.

Census tracts vary by population and concentration of residents. The higher-than average result may be explained by the demographics of the census tracts (some tracts have much higher populations than others). The overall number of applicants among these 20 tracts is only 1,384, which is not a high

volume of applications. This may indicate a smaller number of applicants and a smaller stock of available housing within the geographic boundaries of the census tracts. The low number of originations among all 20 census tracts does reflect generally the lower number of African Americans accessing the mortgage market.

Table 35: Concentrations of African American Census Tracts in Pinellas County Census Tracts: 30 Percent or Higher of Population

Census Tract:	20101	20201	20202	20206	20207	20208	20209	20301	20302	20500	20600	20700	20800	21200	21600	22000	25800	26200	26300	28700	TOTAL AMONG ALL TRACTS	Percent
Loans Originated	67	62	44	53	39	19	66	51	114	34	30	34	37	13	8	65	56	10	104	13	919	66%
Applications Approved but not Accepted	4	2	2	0	0	2	0	2	4	0	2	0	2	0	0	3	2	3	3	1	32	2%
Applications Denied by Financial Institution	12	12	5	5	7	2	5	4	27	5	5	6	7	8	2	13	13	2	26	2	168	12%
Applications Withdrawn by Applicant	10	16	8	12	9	5	17	18	31	12	6	6	7	9	4	16	14	4	20	3	227	16%
File Closed for Incompleteness	6	5	0	3	2	0	2	1	5	2	1	1	1	3	0	1	0	1	3	1	38	3%
All Applications Received	99	97	59	73	57	28	90	76	181	53	44	47	54	33	14	98	85	20	156	20	1,384	100%

Concentrations of Hispanics in Pinellas County Census Tracts

Pinellas County has a Hispanic population of 9 percent. In order to examine rates of loan originations among census tracts with a concentration of Hispanics, a sort was conducted that isolated census tracts 20 points higher than the average population. The result of the sort is five census tracts that are at least 29 percent Hispanic. The overall loan origination rate was 63 percent, versus 66 percent for Hispanics in Pinellas County as whole.

Census data indicates that, although Hispanics are 9 percent of the population, they are widely dispersed throughout the County.

Table 36: Concentrations of Hispanic Census Tract in Pinellas County Census Tracts: 29 Percent or Higher

Census Tract:	026400	026703	024510	026818	026819	TOTAL AMONG ALL TRACTS	Percent
Loans Originated	16	56	53	32	5	162	63%
Applications Approved but not Accepted	1	1	3	0	0	5	2%
Applications Denied by Financial Institution	4	20	9	3	4	40	16%
Applications Withdrawn by Applicant	8	12	9	5	4	38	15%
File Closed for Incompleteness	0	2	1	5	4	12	5%
All Applications Received	29	91	75	45	17	257	100%

Geographic Areas of Low Mortgage Origination

Within Pinellas County, a sort was executed to identify census tracts with loan origination rates of 50 percent or below. Eight census tracts were identified with the lowest rates of loan originations, ranging from 50 percent to 29 percent. As with other aspects of HMDA data, the underlying reasons are not provided. Among these census tracts, there could be a very limited supply of housing (industrial or commercial areas), or they may be areas of very low income.

Areas with low loan origination rates can benefit from geographically focused emphasis on training to lenders, testing activities, and public awareness of how to find and purchase housing. There could also be externalities that are prohibiting underwriting, such as a high concentration of rental properties within specific types of communities, or nonconforming property uses negatively impacting values. The overall number of loans originated and applications denied/withdrawn among the eight Census tracts is 289, which represents a small number of transactions compared to the County as a whole.

The following chart identifies Census tracts with the lowest percentage of loan originations in Pinellas County.

Table 37: Pinellas County Census Tracts with Lowest rates of approval

Census Tract	Loans Originated (All Types)	Applications Denied/Withdrawn	Total Applications	Percent of Applications
			Received	Approved
026819	5	12	17	29%
025305	4	7	11	36%
021200	13	20	33	39%
025408	28	38	66	42%
024602	34	39	73	47%
028402	15	17	32	47%
025308	18	19	37	49%
026200	10	10	20	50%

The Census tracts were mapped and they are in the following geographic areas:

Census Tract 026819 (29 Percent Approval):

City of Clearwater: NW Corner Gulf-to-Bay Boulevard and U.S. Highway 19

Census Tract 025305 (36 Percent Approval)

City of Largo: Central Largo

Census Tract 021200 (36 Percent Approval)

City of St. Petersburg: Jordan Park and Thirteenth Street Heights

Census Tract 025408 (36 Percent Approval)

City of Largo: East Largo

Census Tract 024602 (36 Percent Approval)

Pinellas County (Unincorporated): East Lealman Target Area

Census Tract 028402 (36 Percent Approval)

City of Gulfport: South Central Gulfport to Boca Ciega Bay

Census Tract 025308 (36 Percent Approval)

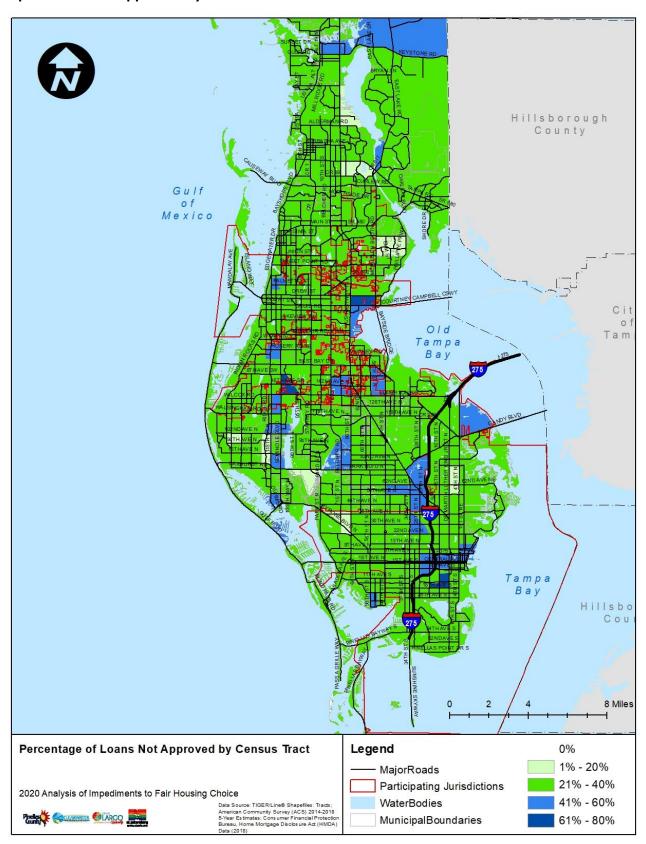
City of Largo and Pinellas County (Unincorporated): South Central Largo descending into Pinellas

County (Unincorporated)

Census Tract 026200 (36 Percent Approval)

City of Clearwater: North Greenwood Target Area

Map 9: Loans Not Approved by Census Tract



Further review of these Census tracts may be warranted to determine why the rates of approval are so low. Several of these Census tracts overlay widely known areas of low-income and minority populations, which already receive special consideration for housing and community development funding (North Greenwood Target Area in Clearwater, East Lealman Target Area in Pinellas County, Jordan Park in St. Petersburg). A few areas are adjacent to target areas, while others do not appear to be exceptional.

Pinellas County Loan Originations by Sex

Discrimination on the basis of sex is prohibited under the Fair Housing Act. The sex of mortgage applicants is recorded and can be analyzed for patterns of discrimination. In 2018, 27 percent of completed loan applications (approved and denied) in Pinellas County were by women, 323 percent were by men, 33 percent were joint (men and women), and 8 percent did not identify a sex on the application. Single men and women were approved at approximately the same rate, 68 percent and 69 percent, respectively. Joint applications had higher rates of approval at 75 percent, probably because joint applications tend to have higher incomes. Based on this data, sex does not appear to be a detriment to fair housing choice in regard to loan originations.

Table 38: Pinellas County Loan Originations by Sex (2018)

	Loan Originated	Application Denied	TOTAL	Percent Approved
Female	7,446	3,297	10,743	69%
Male	8,733	4,050	12,783	68%
Joint	9,848	3,235	13,083	75%
Sex Not Available	2,126	901	3,027	70%
Total	28,153	11,483	39,636	71%

By way of comparison, a review of national data for 2018 indicates that 21 percent of applicants approved or denied were female, which is 6 percent lower than Pinellas County. The percentage of men, 32 percent, is the same. The national rate of joint applications is 5 percent higher than Pinellas County. Overall, the national percentage of approval for all sexes was 4 percent higher than Pinellas County. The difference is not outsized, but it does point to a potential issue with access to mortgage financing for the County. Because the national data and local data track so closely, it does not appear that discrimination on the basis of sex is a concern.

Table 39: National Loan Originations by Sex (2018)

	Loan Originated	Application Denied	TOTAL	Percent Approved
Female	1,556,161	637,384	2,193,545	71%
Male	2,391,409	915,661	3,307,070	72%
Joint	3,113,334	776,662	3,889,996	80%
Sex Not Available	659,062	224,133	883,195	75%
Total	7,719,966	2,553,840	10,273,806	75%

Home Loans by Type of Loan

HMDA data identifies the type and frequency of loan products accessed by Pinellas County residents.

The different types of loans are:

<u>Conventional</u>: A conventional loan is a mortgage that is not guaranteed or insured by any government agency.

<u>FHA:</u> A Federal Housing Administration loan is a mortgage issued by a federally approved bank or financial institution that is insured by the Federal Housing Administration. These are riskier loans that require additional underwriting from FHA.

<u>VA</u>: Veterans Administration loans are offered through private lenders, but a portion is guaranteed by the VA. These loans offer attractive rates for qualified applicants.

<u>USDA:</u> The U.S. Department of Agriculture offers the Section 502 Guaranteed Loan Program to assists approved lenders in providing low- and moderate-income households financing. The program is largely targeted to rural areas.

Most applicants in Pinellas County applied for conventional financing, 83 percent; 10 percent applied for FHA financing; 7 percent received VA financing; and less than 1 percent utilized USDA programs. Rates of approval were somewhat lower for conventional financing than FHA and the VA.

Table 40: Pinellas County Loan Data by Type of Financing

Type of Financing	Loan Originated	Application Denied	TOTAL	Percent Approved
Conventional	23,172	9,764	32,936	70%
FHA	2,999	1,033	4,032	74%
VA	1,982	685	2,667	74%
USDA	0	1	1	0%
TOTAL	28,153	11,483	39,636	71%

Data for the Tampa/St. Petersburg/Clearwater MSA

Following is additional data for the Tampa/St. Petersburg/Clearwater MSA. HMDA data indicates increased loan approval rates with increased income. This is an unsurprising result because higher incomes are usually indicative of higher credit ratings and more money for housing. The HMDA data again indicates that, as incomes increase, loan approvals increase. The rates generally follow racial groups in equal measure.

Table 41: Tampa/St. Petersburg/Clearwater MSA Loans by Income

Income Range	Originated Loans	Application Denied	TOTAL	Percent
<50%	5,726	6,336	12,062	47%
50-79%	16,690	7,957	24,647	68%
80-99%	5,550	2,054	7,604	73%
100-119%	15,173	5,630	20,803	73%
>120%	43,099	12,445	55,544	78%
TOTAL	86,238	34,422	120,660	71%

Table 42: Tampa/St. Petersburg/Clearwater MSA Loans by Race and Income Less Than 50% of MSA/MD Median

LESS THAN 50% OF MSA/MD MEDIAN				
Income	Originated Loans	Application Denied	Originated + Denied Total	Percent Originated
Race				
American Indian or Alaska Native	22	51	73	30%
Asian	139	247	386	36%
Black or African American	388	540	928	42%
Native Hawaiian or Other Pacific Islander	12	41	53	23%
White	4,490	4,452	8,942	50%
2 or more minority races	3	11	14	21%
Joint	38	28	66	58%
Free Form Text Only	0	4	4	0%
Race Not Available	634	962	1,596	40%
Ethnicity				
Hispanic or Latino	998	1,204	2,202	45%
Not Hispanic or Latino	4,023	4,245	8,268	49%
Joint	60	76	136	44%
Free Form Text Only	2	2	4	50%
Ethnicity Not Available	643	809	1,452	44%
TOTAL	5,726	6,336	12,062	47%

Table 43: Tampa/St. Petersburg/Clearwater MSA Loans by Race and Income 50-79% of MSA/MD Median

50-79% OF MSA/MD				
MEDIAN				
Income	Originated	Application	Originated +	Percent
	Loans	Denied	Denied Total	Originated
Race				
American Indian or Alaska	71	53	124	57%
Native				
Asian	433	247	680	64%
Black or African American	1,253	732	1,985	63%
Native Hawaiian or Other	41	54	95	43%
Pacific Islander				
White	12,947	5,572	18,519	70%
2 or more minority races	15	17	32	47%
Joint	131	89	220	60%
Free Form Text Only	3	4	7	43%
Race Not Available	1,796	1,189	2,985	60%
Ethnicity				
Hispanic or Latino	3,240	1,518	4,758	68%
Not Hispanic or Latino	11,513	5,271	16,784	69%
Joint	193	128	321	60%
Free Form Text Only	4	11	15	27%
Ethnicity Not Available	1,740	1,029	2,769	63%
TOTAL	16,690	7,957	24,647	68%

Table 44: Tampa/St. Petersburg/Clearwater MSA Loans by Race and Income 80-99% of MSA/MD Median

80-99% OF MSA/MD MEDIAN				
Income	Originated Loans	Application Denied	Originated + Denied Total	Percent Originated
Race				
American Indian or Alaska Native	16	18	34	47%
Asian	119	55	174	68%
Black or African American	418	207	625	67%
Native Hawaiian or Other Pacific Islander	15	7	22	68%
White	4,259	1,416	5,675	75%
2 or more minority races	7	7	14	50%
Joint	70	29	99	71%
Free Form Text Only	0	0	0	0%
Race Not Available	646	315	961	67%
Ethnicity				
Hispanic or Latino	905	346	1,251	72%
Not Hispanic or Latino	3,922	1,385	5,307	74%
Joint	104	49	153	68%
Free Form Text Only	1	1	2	50%
Ethnicity Not Available	618	273	891	69%
TOTAL	5,550	2,054	7,604	73%

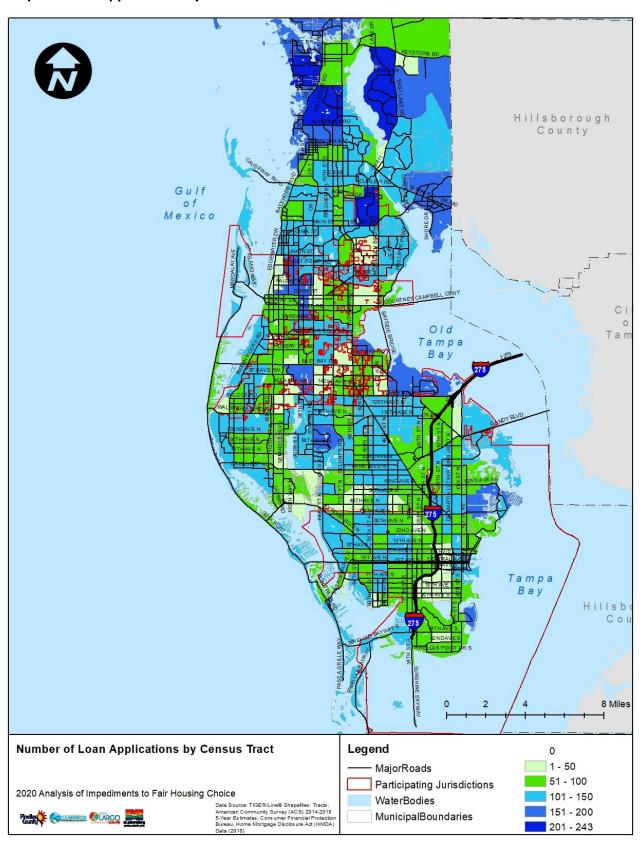
Table 45: Tampa/St. Petersburg/Clearwater MSA Loans by Race and Income 100-119% of MSA/MD Median

100-119% OF MSA/MD MEDIAN				
Income	Originated Loans	Application Denied	Originated + Denied Total	Percent Originated
Race				
American Indian or Alaska Native	42	35	77	55%
Asian	408	166	574	71%
Black or African American	1,149	520	1,669	69%
Native Hawaiian or Other Pacific Islander	31	22	53	58%
White	11,560	3,898	15,458	75%
2 or more minority races	39	9	48	81%
Joint	228	90	318	72%
Free Form Text Only	0	0	0	0%
Race Not Available	1,716	890	2,606	66%
Ethnicity				
Hispanic or Latino	2,052	886	2,938	70%
Not Hispanic or Latino	11,069	3,797	14,866	74%
Joint	358	141	499	72%
Free Form Text Only	1	3	4	25%
Ethnicity Not Available	1,693	803	2,496	68%
TOTAL	15,173	5,630	20,803	73%

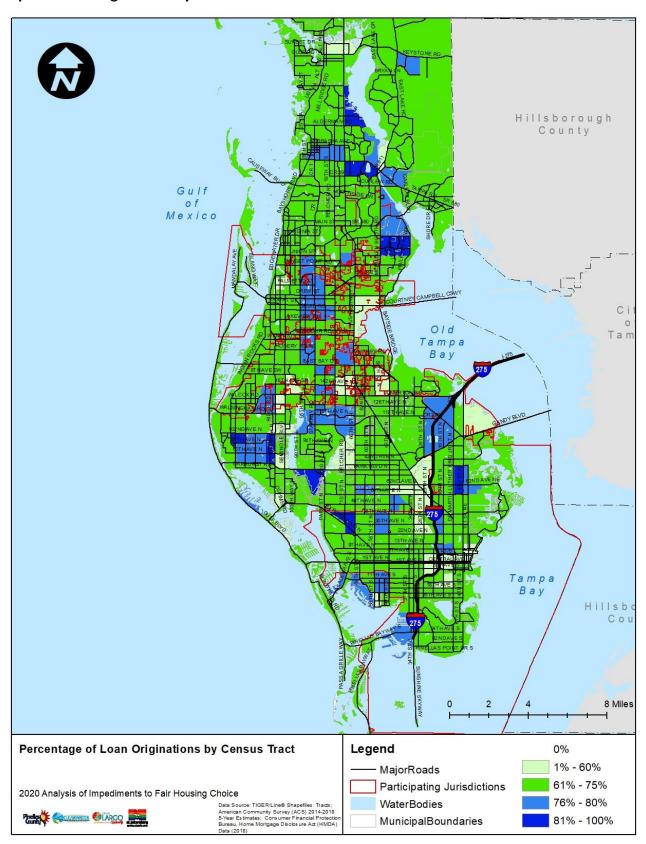
Table 46: Tampa/St. Petersburg/Clearwater MSA Loans by Race and Income 120% or More of MSA/MD Median

120% OR MORE OF MSA/MD MEDIAN				
Income	Originated Loans	Application Denied	Originated + Denied Total	Percent Originated
Race				
American Indian or Alaska Native	104	40	144	72%
Asian	1,635	520	2,155	76%
Black or African American	1,953	843	2,796	70%
Native Hawaiian or Other Pacific Islander	63	38	101	62%
White	32,709	8,659	41,368	79%
2 or more minority races	36	22	58	62%
Joint	1,011	294	1,305	77%
Free Form Text Only	6	4	10	60%
Race Not Available	5,582	2,025	7,607	73%
Ethnicity				
Hispanic or Latino	3,385	1,252	4,637	73%
Not Hispanic or Latino	32,523	8,851	41,374	79%
Joint	1,529	424	1,953	78%
Free Form Text Only	9	9	18	50%
Ethnicity Not Available	5,653	1,909	7,562	75%
TOTAL	43,099	12,445	55,544	78%

Map 10: Loan Applications by Census Tract



Map 11: Loan Originations by Census Tract



Summary of Analysis

A review of HMDA data for Pinellas County reveals some important points. As indicated earlier, HMDA data does not, by itself, reveal patterns of discrimination. Like the warning light on the dash of a car, HMDA data can draw attention to potential trouble areas. Here are the primary takeaways from this analysis:

<u>Race</u>: Race is a persistent concern in lending. Although the rate of loan originations for African Americans has improved since the last impediments study, the rate remains well below the rate of approvals for White applicants, 59 percent and 73 percent, respectively.

<u>Volume:</u> The rate of African American applicants is well below their numbers in the population. While 10 percent of the County is African American, only 4 percent were mortgage applicants (approved or denied completed applications).

<u>Census Tracts with Low Levels of Loan Originations:</u> There are 8 census tracts in Pinellas County that have loan origination rates below 50 percent.

Rates of loan origination based on sex and ethnicity appear to be in line with expected results. County residents take advantage of the various types of housing financing available to them, with conventional financing being the most widely utilized.

Fair Housing Index

Introduction

The Fair Housing Index combines the census tract variables from the 2018 American Community Survey (ACS) 5-Year estimates with the loan originations from the Home Mortgage Disclosure Act (HMDA) database. The variables were used to classify census tracts by relative risk of impediments to fair housing choice. A map of the spatial distribution of risk provides an indication of where residents may experience various levels of housing discrimination or have problems finding affordable, appropriate housing.

Methodology

In order to arrive at a summary of geographic areas where fair housing issues may be the most severe, a Fair Housing Index was developed that combines census and HMDA data. Six factors were considered including the percentage of racial minority, ethnic minority, persons with disabilities, female head of households with children, loan originations, and low-to moderate-income population within Pinellas County Census tracts. Data was sourced from the 2014-2018 ACS. The details of the factors are provided below.

The Fair Housing Index uses 6 factors:

- 1. Racial Minority: Census tracts greater than 18 percent minority (Pinellas County is 18 percent racial minority).
- 2. Ethnic Minority: Census tracts over 9 percent Hispanic (Pinellas County is 9 percent ethnic minority).
- 3. Persons with Disabilities: Census tracts where over 15 percent of the population has one or more disabilities (This population is 15 percent of Pinellas County's population overall).
- 4. Female Head of Households with Children: Census tracts where over 5 percent of the population is a female headed household with children (This population is 5 percent of Pinellas County's population overall).
- 5. Loan Originations: Census tracts with lower than average approvals (i.e., less than 69 percent, the average approval rate in Pinellas County overall).
- 6. Low- to Moderate-Income Population: Census tracts where 50 percent of more of the population is low-to moderate-income.

Each Census tract was assigned one point for each of the factors listed above. For example, if a Census tract had an ethnic minority greater than 9 percent and a loan origination rate of less than 69 percent, but no other factors, then the Census tract was assigned an index value of 2.

Findings

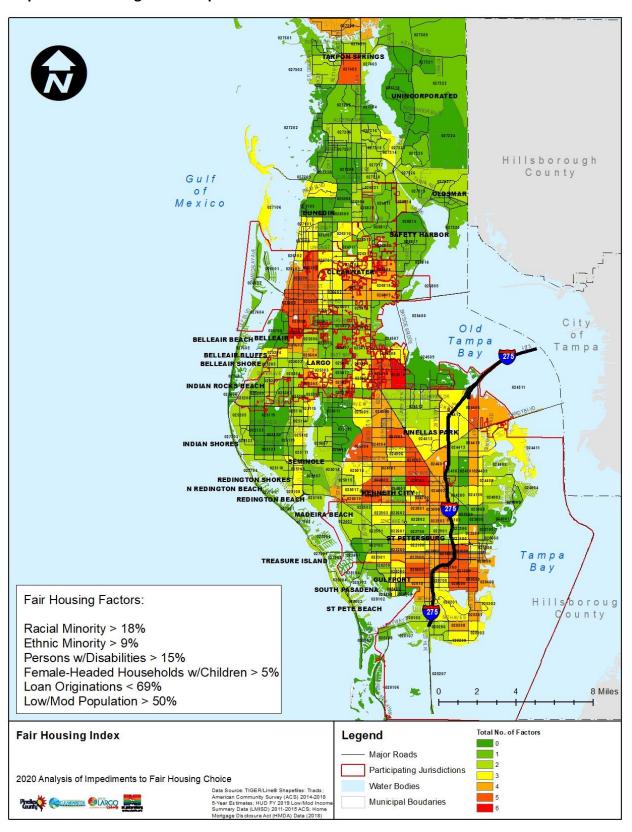
Table 47 provides a list of 21 census tracts at high risk in the Fair Housing Index. Specifically, these census tracts have indexes higher than 4. Several of them are within designated target areas, including: Pinellas County's Tarpon Springs Target Area; City of Clearwater's North Greenwood Target Area, Pinellas County's High Point Target Area; and Pinellas County's Central Lealman Target Area.

Table 47: Fair Housing Index of Census Tracts with Greater than 4 Factors

Census Tract	Index Factors
20500	5
20600	5
20800	5
20800	5
21600	5
21800	5
24406	5
24510	6
24514	5
24701	6
24902	5
24905	5
25004	5
25505	6
25800	5
25900	5
26200	5
26300	5
26400	5
27402	5
28700	5

Each of these Census tracts have a high number of risk factors for impediments to fair housing choice, including race, familial status, and disability. Access to housing in these areas should be closely monitored for possible impediments to fair housing choice.

Map 12 Fair Housing Index Map



Impediments to Fair Housing and Recommendations

According to HUD, impediments to fair housing choice are:

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restricts housing choices or the availability of housing choices, or any actions omissions, or decisions that have this effect. (HUD Fair Housing Planning Guide)

In order to determine the impediments to fair housing, Pinellas County conducted four community meetings and one housing focus group, distributed a countywide survey, reviewed HMDA data, eviction rates, reviewed current efforts, and held numerous meetings with staff. Based on the information received through these efforts, there are impediments to fair housing choice in Pinellas County. The impediments to fair housing that have been identified largely echo previous fair housing studies, and those recommendations will be forwarded to complement continuing efforts. However, a few critical differences have been observed through these efforts.

First and foremost, the cost of housing has risen to the top of every meeting and survey as the principal concern. Among all types of people across broad income groups, the cost of housing in Pinellas County is continuing to rise and outpace the ability of residents to afford housing, both rentals and through homeownership. The cost of housing is not an impediment on its face, but it is related to recognized impediments and must be addressed as such.

Related to cost is the availability of housing choice, especially in proximity to transportation corridors. The fewer units that are available to rent or purchase, the higher the cost to attain housing for everyone in the market. As economic pressures increase, marginalized groups are more likely to face discrimination and have fewer housing choices. There are two examples of how this is affecting housing choice in Pinellas County:

<u>Housing Choice Vouchers/Section 8</u>: Housing officials in Pinellas County have stated numerous times that landlords are increasingly unwilling to accept Section 8 housing vouchers because the limited supply of housing is creating a surge in market rate demand. Landlords are unwilling to enter into contract with local housing authorities in these circumstances. This imbalance in the rental market disproportionately and negatively impacts minority protected classes.

<u>Eviction Rate:</u> Pinellas County consistently has higher-than average eviction rates in the years 2010 to 2016, according to a study by Princeton University. Evictions in turn drive homelessness, and the homeless in Pinellas County are much more likely to be African American than the population at large (about 50 percent versus about 10 percent).

Another difference noted between the prior impediments study and current data is that mortgage originations based on race appear to be less disparate. In the prior study, protected classes were shown to have much lower rates of mortgage origination than white borrowers. The 2016 impediments study indicated a loan origination rate of 48 percent for African American families, and 70 percent for white families (data for the prior study was from 2007 to 2013). Recent data

indicates that this gap has closed—59 percent for African American families and 73 percent for white families in 2018 (Based on Loans Originated versus Applications Denied).

The HMDA data does not provide a reason for this difference or what may have changed since the last analysis of HMDA data. Lending standards were very different before 2008, so the explanation may lie within the loan application process. For example, lenders may have encouraged higher risk customers (i.e., lower income applicants with lower credit scores) to complete loan applications, which may have resulted in higher rates of denials. Whatever the cause, the HMDA data indicates more consistent rates of loan origination across all protected classes, with income being the primary driver of denials. However, despite this progress, it is advisable to remain vigilant in regard to protected classes and their access to mortgage products. A difference remains of 14 points between African American applicants and White applicants for loan approvals. Therefore, while Pinellas County can celebrate some success in closing the gap, equal access to mortgage origination is still considered an impediment to fair housing choice.

Based on the results of the impediments study, the following are impediments to fair housing choice in Pinellas County:

Impediment 1: Cost and Availability

The cost and availability of housing is an impediment to fair housing choice.

The cost of housing in Pinellas County is driving all discussions about housing choice. It is important to clarify that the cost of housing in a community is not technically an impediment to fair housing choice since the laws are designed to protect access to housing based on the protected classes rather than affordability. However, the two issues of fair housing choice and high cost converge when market demand disproportionately impacts protected classes. Proactive steps taken by local jurisdictions to create greater housing opportunities will, in turn, provide benefit to everyone in the community, especially protected classes.

Pinellas County believes everyone should have access to housing and that lowering the barrier of cost will enhance fair housing choice.

Actions:

- Continue to fund programs using local, state and federal resources to provide housing opportunities to residents through the creation of new housing, the rehabilitation of existing housing, acquisition of housing, and housing financing (mortgage assistance, developer financing, etc.).
- Encourage landlords and local housing agencies to develop strategies to deploy Section 8 vouchers to more properties across Pinellas County.
- Allocate resources countywide according to need, paying particular attention to census tracts with high concentrations of minority residents.

- Continue to work with non-profits, educators, and hiring professionals to ensure job readiness and training providers sponsor educational classes and job fairs in African American communities.
- Continue to advocate and partner with developers to entice businesses to the area that provide new employment opportunities that match educational levels of the community. Continue to ensure that all vendors and contractors and employees paid with state and federal funds are contractually obligated to affirmatively assure that minority business and women's business enterprises have an equal opportunity to complete for contracts, subcontracts, sources of supplies, equipment, construction and services.
- Continue to ensure that all project sponsors, vendors and contractors assure equal
 employment opportunity to all persons regardless of race, color, national origin, sex or
 disability for federally-funded subrecipients.

Impediment 2: Evictions

Evictions are an impediment to fair housing choice.

Pinellas County experiences a higher-than average eviction rate, which can lead to homelessness. A 2020 study by The Eviction Lab and Princeton University concluded that Pinellas County experiences consistently higher-than average rate of evictions (evictions per 100 tenants). The national average is about 2.3 percent, whereas Pinellas County is consistently 2.5 percent, with higher percentages in Lealman and the City of St. Petersburg. Evictions are a cause of homelessness, which places enormous burdens on families, social service providers, and government. Among the homeless population, about half are African American, which is a ratio about five times higher than the African American population of Pinellas County. Pinellas County and its partners can actively remove impediments to fair housing choice by keeping people in their homes, so they do not have to seek other housing or are not forced into homelessness.

The report found that all communities were above the eviction national average of approximately 2.3 percent, with Lealman having by far the highest rate of 6.12 percent. Eviction rates for Pinellas County and St. Petersburg were much closer at 2.5 percent and 2.95 percent, respectively. Lealman is a much lower-income community than the County or the City of St. Petersburg, so a higher average eviction rate, while problematic, is not surprising.

Of concern is that Pinellas County and St. Petersburg are consistently higher than the national average eviction rate of 2.3 percent in 2016. The conclusion from this statistic is that renters in Pinellas County are having difficulty staying housed and are at greater risk of eviction than the country as a whole. This finding is consistent across multiple years, from 2010 to 2016, and tracks economic expansions and contractions.

Eviction rates for other municipalities in Pinellas County were not included as part of the Princeton University report.

Table 48: 2016 Eviction Rates

Community	Evictions Per Day	Evictions Per Year	Eviction Rate*
Lealman	0.68	248	6.12%
St. Petersburg	3.98	1,453	2.95%
Pinellas County	10.85	3,960	2.50%

^{*} Number of Evictions Per 100 Rental Households

Eviction rates are an important indicator for homeless populations since an eviction event is often the cause of prolonged homelessness. This discussion is relevant to Fair Housing because there is a disparity of African Americans among the homeless population, with African Americans comprise over 50 percent of the homeless population from year to year. In an effort to determine the cause of this disparity, the Pinellas County Homeless Leadership Alliance is procuring a consultant to conduct data collection, data analysis, and author and publish a formal report on racial disparities among the homeless in the Pinellas County Continuum of Care. The study is expected to be completed in 2020.

While there is presently no direct evidence to support racial discrimination in evictions and subsequent homelessness, it is noteworthy that the homeless are generally around 50 percent African American, whereas the population of Pinellas County is only 10 percent African American. This issue bears closer examination and Pinellas County will review the study once it is completed to determine the relationship, if any, between race, homelessness and fair housing choice.

The City of St. Petersburg has recently adopted a Tenant Bill of Rights, which outlines rights, policies and procedures for eviction proceedings. The policy echoes fair housing protections. Other communities in Pinellas County are also considering ways to keep tenants housed.

Actions:

- Review and follow up with the Pinellas County Homeless Leadership Alliance regarding the study being commissioned in 2020 to determine the causes of disproportionate homelessness among African Americans.
- Encourage municipalities to review local ordinances and, where possible, assist with the enforcement of tenant's rights.

Impediment 3: Housing Stock

The housing stock is an impediment to fair housing choice.

Pinellas County has an aging housing stock, with large tracts of the County dating to the 1950s, 1960s and 1970s. Many of these homes require repairs or modifications to accommodate residents.

In the time since the last Analysis of Impediments to Fair Housing Choice study, there has been explosive growth of multi-family housing, including high-rise rentals, condominiums, and

townhouses. The majority of new units are targeted to households over 120 percent of AMI. A disproportionate number of low income and protected classes occupy housing that is over 50 years old and is often obsolete.

Actions:

- Continue to provide assistance to low income families to modify existing housing stock through renovations.
- Provide incentives to developers, CHDOs, and housing providers to create new housing for eligible residents, with particular emphasis on accessibility and equal housing opportunity for everyone.
- Continue to ensure that all project sponsors, vendors and contractors assure equal employment opportunity to all persons regardless of race, color, national origin, sex or disability for federally-funded subrecipients.

Impediment 4: Protected Classes

Discrimination against protected classes is an impediment to fair housing choice.

Pinellas County is a densely developed, urban, diverse community with representatives from numerous racial and ethnic backgrounds. The County has historically had large numbers of elderly residents, as well as the disabled. It is critical to provide ongoing fair housing protections to these residents. Historically, areas of minority concentration have faced discrimination in housing choice. Data indicate that discrimination based on race appears to have improved (based on mortgage origination rates) but is certainly still present (e.g. the second highest category of complaints to the Office of Human Rights is race).

The highest rate of complaints about fair housing choice is related to disabilities and reasonable accommodation.

Pinellas County is proactive in addressing discrimination through the Office of Human Rights, which is a fully staffed and efficacious organization dedicated to enforcing and educating citizens about fair housing choice.

Actions:

- Conduct at least one test of fair housing and lending practices compliance in Pinellas County.
- Continue to support the Pinellas County Council for Persons with Disabilities.
- Continue to support the Pinellas County Office of Human Rights in enforcement activities such as collecting and investigating fair housing complaints.

Impediment 5: Education

A lack of education is an impediment to fair housing choice.

Educating the public, realtors, landlords, bankers, and others about Fair Housing laws is an ongoing process that must continue. In addition to the Federal statute, there are local ordinances in Pinellas County that provide protections for additional classes, such as sexual orientation. Residents of Pinellas County face fair housing issues constantly whether they are buying or selling a house, renting an apartment, operating as landlords, or working in a housing-related profession. Everyone needs to know and understand the rules that govern fair housing.

Actions:

- Continue to allocate resources to publicize fair housing in social media, advertisements and brochures.
- Continue to support the ongoing efforts of the Pinellas County Office of Human Rights to
 enforce and educate the public about fair housing policy, especially with regards to
 service animals and reasonable accommodation.
- Continue to support the ongoing efforts of the Pinellas County Office of Human Rights to
 enforce and educate the public about fair housing policy with special emphasis on the
 protected classes.

Impediment 6: Underserved Transportation Corridors

Underserved transportations corridors are an impediment to fair housing choice.

Pinellas County is an urban community that has been largely developed for decades. The County follows suburban patterns of development with multiple downtown and commercial districts. The County is relatively compact compared to other counties in Florida. However, despite dense development and a robust system of arterial roadways, transportation for all residents is restrictive. Residents face substantial obstacles in commuting between areas of employment (downtown districts such as St. Petersburg, Clearwater, and Largo) and housing opportunities. As a result, fair housing choice is limited for protected classes.

Actions:

- Review local ordinances and develop policies and procedures to prioritize the development of housing opportunities along major transportation corridors.
- Coordinate with the Pinellas Suncoast Transit Authority to provide enhances access between areas of employment and housing.

Impediment 7: Limited English Proficiency (LEP)

Limited English Proficiency (LEP) is an impediment to fair housing.

Pinellas County is a diverse community with residents that may not speak or read English. The County believes that all residents should have access to fair housing choice regardless of their language.

Actions

- Provide all housing program materials in other languages as requested, with particular emphasis on Spanish. Other languages will be provided upon request.
- Continue to offer homebuyer classes and counseling in Spanish.
- Continue to ensure that all Fair Housing marketing plans and publications contain information in Spanish advising persons of their rights under the Fair Housing Act.
- Provide fair housing information and published materials in other languages such as
 Vietnamese with reasonable notification of the need for such materials.

Appendix