

Meeting Date: **June 23, 2015**

Agenda Item 12

REQUESTED COMMISSION ACTION:

<input checked="" type="checkbox"/> Consent	<input type="checkbox"/> Ordinance	<input checked="" type="checkbox"/> Resolution	<input type="checkbox"/> Consideration/ Discussion	<input type="checkbox"/> Presentation
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SHORT TITLE A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF POMPANO BEACH, FLORIDA, APPROVING AND ACCEPTING THE CITY'S ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE AND AUTHORIZING THE PROPER CITY OFFICIALS TO EXECUTE THE ANALYSIS; PROVIDING AN EFFECTIVE DATE. (No Fiscal Impact)

Summary of Purpose and Why:

Under the Consolidated Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act.

The attached Analysis of Impediments accompanies the 2015-2019 Consolidated Plan for which approval is also sought at this Commission meeting.



Goal 5.0 – Improve Neighborhoods

(1) Origin of request for this action:	<u>Office of Housing and Urban Improvement</u>
(2) Primary staff contact:	<u>Miriam Carrillo/Mark Korman</u> <u>Ext. 4656/7839</u>
(3) Expiration of contract, if applicable:	<u>N/A</u>
(4) Fiscal impact and source of funding:	<u>N/A</u>

<u>DEPARTMENTAL COORDINATION</u>	<u>DATE</u>	<u>DEPARTMENTAL RECOMMENDATION</u>	<u>DEPARTMENTAL HEAD SIGNATURE</u>
<u>OHUI</u>		<u>Approval</u>	<u>[Signature]</u>
<u>Finance</u>	<u>6/12/15</u>	<u>Approval</u>	<u>[Signature]</u>
<u>City Attorney</u>	<u>6/16/15</u>		<u>[Signature]</u>
<input checked="" type="checkbox"/> <u>City Manager</u>	<u>[Signature]</u>		<u>[Signature]</u>

ACTION TAKEN BY COMMISSION:

<u>Ordinance</u>	<u>Resolution</u>	<u>Consideration</u>
<u>Workshop</u>		
<u>1st Reading</u>	<u>1st Reading</u>	<u>Results:</u>
<u>2nd Reading</u>		<u>Results:</u>



**City of Pompano Beach
Office of Housing and Urban Improvement**

Memorandum No. 15-177

MEMORANDUM

DATE: June 11, 2015
TO: Dennis Beach, City Manager
THROUGH: Gordon Linn, City Attorney
FROM: Miriam Carrillo, Director *MC*
RE: **Agenda Item – Analysis of Impediments**

This resolution approves and authorizes signature of the City's 2015 Analysis of Impediments (AI).

The Housing and Community Development Act of 1974, as amended, is the dominant statute for the Community Development Block Grant (CDBG) program. It requires that each federal grantee certify to HUD's satisfaction that (1) the awarded grant will be carried out and administered according to the Fair Housing Act, and (2) the grantee will work diligently to affirmatively further fair housing. This certification to HUD may be implemented through the Consolidated Plan process.

Under the Consolidated Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act.

The attached Analysis of Impediments will accompany the 2015-2019 Consolidated Plan for which approval is also sought at the June 23, 2015 Commission meeting.

Please place this item on the June 23, 2015 agenda.

Thank you.

Attachments



City Attorney's Communication #2015-1115
June 11, 2015

TO: Mark Korman, Program Compliance Manager
FROM: Gordon B. Linn, City Attorney
RE: Resolution – 2015 Analysis of Impediments

As requested in your e-mail of June 9, 2015, I have prepared and attached the following form of resolution:

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF POMPANO BEACH, FLORIDA, APPROVING AND ACCEPTING THE CITY'S 2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE AND AUTHORIZING THE PROPER CITY OFFICIALS TO EXECUTE THE ANALYSIS; PROVIDING AN EFFECTIVE DATE.

Please feel free to contact me if I may be of further assistance.

GORDON B. LINN

GBL/ds
L:cor/comdev/2015-1115
Attachment

CITY OF POMPANO BEACH
Broward County, Florida

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF POMPANO BEACH, FLORIDA, APPROVING AND ACCEPTING THE CITY'S 2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE AND AUTHORIZING THE PROPER CITY OFFICIALS TO EXECUTE THE ANALYSIS; PROVIDING AN EFFECTIVE DATE.

BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF POMPANO BEACH, FLORIDA:

SECTION 1. That the City of Pompano Beach approves and accepts the City's 2015 Analysis of Impediments to the Fair Housing Choices, a copy of which Analysis is attached hereto and incorporated by reference as if set forth in full, is hereby approved.

SECTION 2. That the proper City officials are hereby authorized to execute said Analysis indicating the City's approval and acceptance.

SECTION 3. This Resolution shall become effective upon passage.

PASSED AND ADOPTED this _____ day of _____, 2015.

LAMAR FISHER, MAYOR

ATTEST:

ASCELETA HAMMOND, CITY CLERK

City of Pompano Beach, Florida

Analysis of Impediments to Fair Housing Choice

JUNE 2015

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I. INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) for the City of Pompano Beach was conducted by Carras Community Investment, Inc., a private community and economic development consulting firm. As a recipient of Community Development Block Grant (CDBG) entitlement funding from the US Department of Housing and Urban Development (HUD), the City of Pompano Beach is required to identify impediments or barriers to fair housing choice and work to address those barriers.

A. BASIS OF THIS STUDY

Under the Fair Housing Act, the US Department of Housing and Urban Development (HUD) is obligated to administer its programs in such a way as to “affirmatively further fair housing” (AFFH), a requirement that extends to grantees of HUD programs. The Community Development Block Grant (CDBG) program specifically contains a regulatory requirement that entitlement jurisdictions certify that they will affirmatively further fair housing as a condition of the receipt of that funding. This obligation to AFFH, requires the jurisdiction to pursue the following broad objectives:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities;
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act

Specifically, the AFFH obligation requires the grantee to:

- 1) Conduct an analysis to identify impediments to fair housing choice within the jurisdiction
- 2) Take appropriate actions to overcome the effects of any impediments identified through the analysis
- 3) Maintain records reflecting the analysis and actions in this regard.

While the obligation to AFFH arises in connection to the receipt of HUD funds, the obligation extends beyond the operation of HUD-funded programs and applies to all public and privately funded housing and housing-related activities in the jurisdiction.

OVERVIEW OF FAIR HOUSING LAWS

The first housing discrimination protections were established with the Civil Rights Act of 1866, which held that “all citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property.” While by statute, the Act bans discrimination on the basis of race or color, through case law, it has been determined to prohibit discrimination on the basis of national origin and religion as well. The Act, however, went largely unenforced.

To address the continuing unequal access to housing, particularly for racial minorities, Congress passed Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, which prohibits discrimination in housing based on race, color, religion, and national origin. The Fair Housing Act

was amended in 1974 to include sex as a protected class and in 1988 to include disability and familial status.

Fair housing laws apply to all housing related transactions including real estate sales, rentals, mortgage lending, homeowner's insurance, zoning and housing-related harassment. The Fair Housing Act specifically identifies prohibited practices in §3604, §3605, §3606 and §3617. These prohibited practices include:

- To refuse to sell or rent, to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of their membership in a protected class.
- To discriminate against any person in the terms, condition, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of their membership in a protected class.
- To make, print, or publish, any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected class.
- To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that a unit is not available for inspection, sale, or rental when such dwelling is in fact so available.
- To refuse to permit a reasonable accommodation or modification for a person with a disability when such an accommodation or modification is necessary to afford such person equal opportunity to use and enjoy a dwelling.
- A failure to design and construct multi-family housing to meet accessibility standards.

While discrimination can occur overtly, such as a landlord stating that they will not rent to a family with children, the law also covers practices that are less direct. One such area is differential treatment. For example, a landlord cannot apply a more stringent application process to members of a protected class.

Another category of practices covered under the law is disparate impact. These are practices that are seemingly neutral yet have a disproportionate negative impact on members of a protected class. For example, a landlord may institute a policy that they will only accept income from work to verify that someone is qualified to rent a unit, however this practice could have a disproportionate effect on people with disabilities or women with children who receive child support. Regardless of the landlord's intent, the discriminatory effect of these practices would constitute a violation of fair housing laws. Under these provisions, a range of historical practices that have the effect of limiting access to housing for members of protected classes have been interpreted to be illegal under the Fair Housing Act. These include racial steering, exclusionary zoning, blockbusting, discriminatory advertising, and redlining in mortgage, insurance and appraisals.

The Fair Housing Act provides an administrative process to investigate complaints and pursue legal action on behalf of victims of discrimination. Individuals may file administrative complaints with HUD or the Broward County Office of Human Rights which is considered a substantially equivalent agency. Complaints filed with HUD are referred to the Division of Human Rights for investigation.

If Fair Housing violations are proven, victims are eligible for monetary compensation and affirmative relief. Injured parties, including organizations, may also file civil cases on their own in state or federal court.

DEFINING THE ANALYSIS

Impediments to fair housing choice are those factors which may preclude an individual or family from living where they would freely choose to live, or which cause them to live under less favorable circumstances than equal treatment under the law would dictate. In other words, absent barriers which relate to federal and state fair housing laws, these individuals or families would reside elsewhere and/or be free of negative circumstances which accrued to them through unfair housing practices.

The Analysis of Impediments to Fair Housing Choice seeks to identify not only if these prohibited practices are present within a community, but also looks broadly at housing and housing-related issues. Impediments to fair housing are not merely acts of discrimination, but any factor that limits the access to housing opportunities for members of protected classes. Thus, an impediment could be a discrete act of discrimination such as a landlord's refusal to rent to someone with a mobility impairment. Impediments can also be a broad public policy, or lack of public policy, such as the failure of a municipality to ensure an adequate supply of accessible, affordable housing for people with disabilities. As defined by 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 which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin

To identify impediments, the AI involves conducting a comprehensive review of the jurisdiction's laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws, etc. affect the location, availability, and accessibility of housing; and an assessment of conditions, both public and private, affecting fair housing choice.

According to new guidance recently put forth by HUD under a proposed Affirmatively Furthering Fair Housing rule, a fair housing review should seek to use data and community input to do the following:

- Identify integration and segregation patterns and trends across protected classes within the jurisdiction and region;
- Identify racially or ethnically concentrated areas of poverty within the jurisdiction and region;
- Identify whether significant disparities in access to community assets exist across protected classes within the jurisdiction and region; and
- Identify whether disproportionate housing needs exist across protected classes within the jurisdiction or region. Based on this review, the Analysis should seek to identify and prioritize fair housing issues, identify the most significant determinants related to these issues, and establish goals for addressing the determinants.

II. COMMUNITY PROFILE

A. Historical Overview

Pompano Beach is located in northeast Broward County, Florida. According to the University of Florida's Bureau of Economic and Business Research, the population of Pompano Beach was 104,662 in 2014. Pompano Beach is the 19th largest city in Florida and 6th largest in Broward County.

The City of Pompano Beach is located midway between Miami and Palm Beach. It includes about three miles of beachfront that extends from the intersection of State Road A1A and Terra Mar Drive to the Hillsboro Inlet. The City is bounded by the following municipalities: On its Northeast: Hillsboro Beach and Lighthouse Point, on its North: Deerfield Beach, on its West: Coconut Creek, on its Southwest: Margate and North Lauderdale, on its South: Fort Lauderdale, on its Southeast: Lauderdale-by-the-Sea.

In 1908, Pompano Beach was incorporated as a town. Like most of southeast Florida, Pompano Beach experienced great growth in the late 20th century.

B. Demographic Projections

The Bureau of Economic and Business Research estimates the City of Pompano Beach's population was 104,662 in 2014, an increase of 26,471 people (33%), since the 2000 Census population count of 78,191. Much of Pompano Beach's historical growth has been by annexation. In 2004, the City annexed four neighborhoods, which provided 93% of Pompano Beach's population growth between 2000 and 2005.

According to the latest five-year American Community Survey (ACS), the City's approximate population was 101,749 between 2009 and 2013. The Florida Housing Data Clearinghouse anticipates Pompano Beach's population to grow by at least 11% (12,523 residents) between 2015 and 2025.

Table: Population Change, Pompano Beach

Year	Population	Population Change	% Change
2000	78,191		
2010	99,845	21,654	27.7%
2014	104,662	4,817	4.8%

Source: Bureau of Economic and Business Research, 2014

Table: Population Projections, Pompano Beach

Year	Population	Population Change	% Change
2010	99,845		
2013	103,190	3,345	3.4%
2015	105,988	2,798	2.7%
2020	112,587	6,599	6.2%
2025	118,511	5,924	5.3%
2030	124,280	5,769	4.9%
2035	129,502	5,222	4.2%
2040	134,415	4,913	3.8%

Source: Florida Housing Data Clearinghouse, 2015

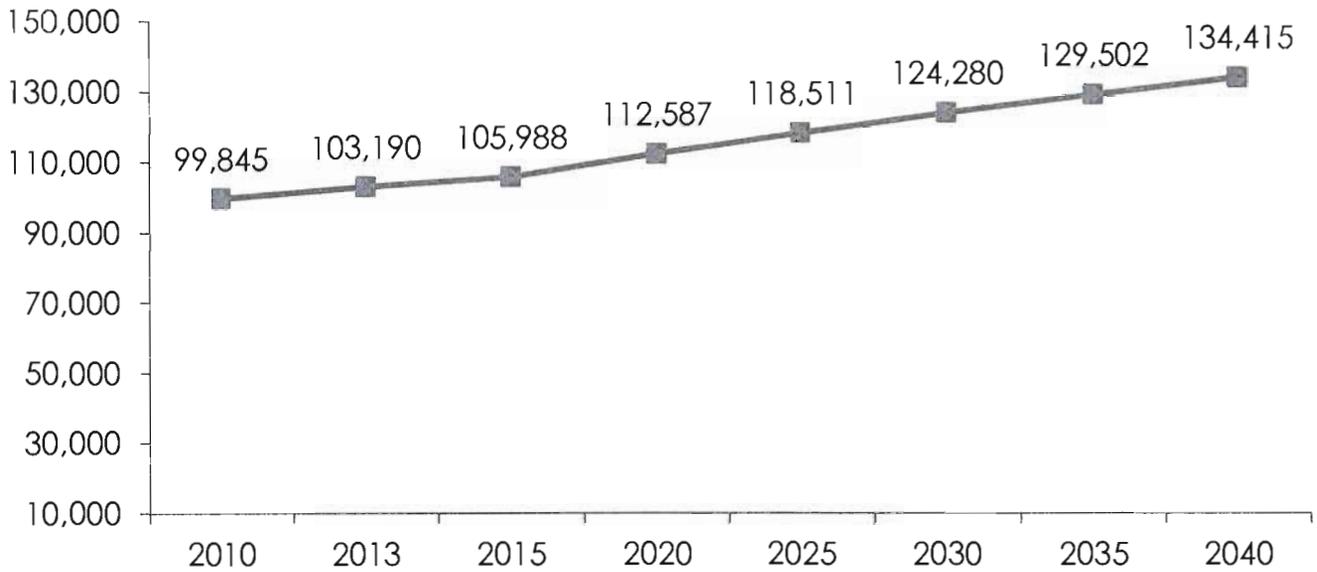


Figure: Population Projections, Pompano Beach

Source: Florida Housing Data Clearinghouse, 2015

C. Population, Race, and Ethnicity: Growing Diversity

According to the 2009-2013 ACS, the population of the City of Pompano Beach was approximately 101,749, of which 51,867 (51%) was comprised of males and 49,882 (49%) females. The City’s median age is 42.4. Approximately 21% of the City’s population was under the age of 19 and 18% was over the age of 65. Of all the residents living in Pompano Beach, 24.9% of people were foreign born, 75% were native, including 34% who were born in Florida, and 35% spoke a language other than English at home. Of those speaking a language another than English at home, 16% spoke Spanish and 18% spoke another language; 16% reported that they did not speak English “very well.”

For people reporting one race alone, 65.7% were White; 29.6% were Black or African American; 1.1% were Asian; less than 0.5% were American Indian and Alaska Native and 1.5% reported two or more races. Approximately 18.1% of the residents living in Pompano Beach are Hispanic.

In the decade between the 2000 and 2010 Census, the City of Pompano Beach’s population has become more diverse. For persons reporting one race, the White population has decreased from 67.8% to 64.4%, while the City’s Hispanic population increased significantly from 9.9% to 17.5%. Within this timeframe, Pompano Beach’s Asian population doubled from 0.8% to 1.7% and the population increased by 4.5%, from 25.4% to 29.9%. Both the Black and Hispanic populations in Pompano Beach increased by around 9,000 residents.

Table: Racial Demographics, Pompano Beach

	2000		2010	
	Number	% Of Total	Number	% Of Total
Not Hispanic or Latino	70,421	90.1%	82,336	82.5%
White	52,989	67.8%	64,333	64.4%
Black or African American	19,897	25.4%	29,888	29.9%
American Indian	186	0.2%	605	0.6%
Asian	636	0.8%	1,694	1.7%
Pacific Islander	22	0.0%	231	0.2%
Other Race	1,602	0.2%	4,472	4.5%
Two or More Races	2,859	3.7%	2,373	2.4%
Hispanic or Latino	7,770	9.9%	17,509	17.5%
Total	78,191	100%	99,854	100%

Source: U.S. Census Bureau, 2000 and 2010 Census

D. Geographic Segregation of Racial Groups

While the City of Pompano Beach continues to become more ethnically and racially diverse, there remains substantial levels of segregation within the City. The Federal Financial Institutions Examination Council (FFIEC) demographic information is shown in the chart below and includes the percentage of minorities within, partially within, or near the City by census tract. The FFIEC data for Pompano Beach indicates there are seven census tracts (303.01, 303.02, 304.01, 304.02, 305, 306, and 308.01) with a significant concentration of minorities. Four of these are considered low-income.

Table: 2014 FFIEC Census Report: Summary Census Demographic Information

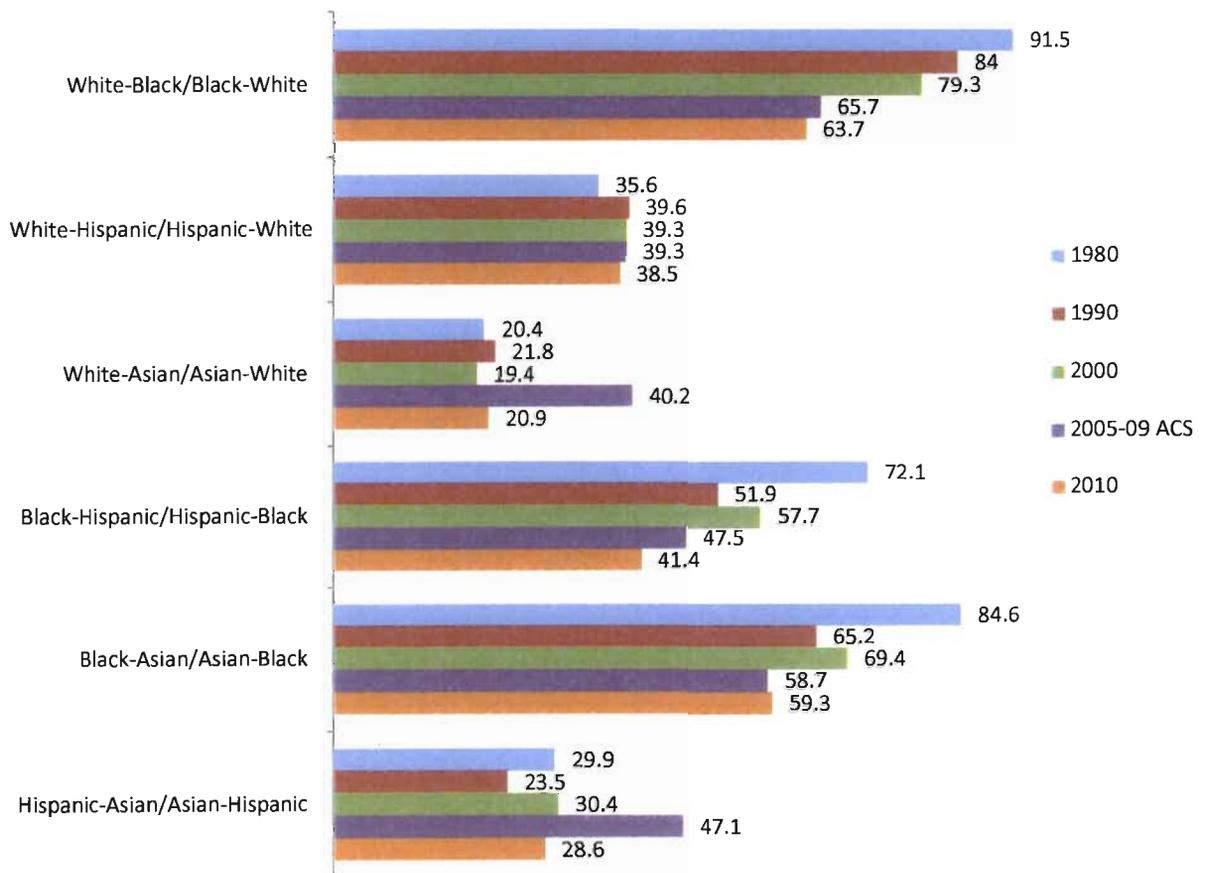
Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2014 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2014 Est. Tract Median Family Income	Tract Population	Tract Minority %	Minority Population
108	Moderate	No	79.31	\$61,800	\$49,014	6,199	53.88	3,340
302.01	Middle	No	85.74	\$61,800	\$52,987	3,838	54.98	2,110
302.02	Middle	No	85.26	\$61,800	\$52,691	1,550	52.06	807
302.03	Moderate	No	64.19	\$61,800	\$39,669	4,058	45.96	1,865
303.01	Low	No	48.19	\$61,800	\$29,781	2,641	83.11	2,195
303.02	Moderate	No	68.07	\$61,800	\$42,067	7,134	76.23	5,438
304.01	Moderate	No	71.26	\$61,800	\$44,039	3,017	99.07	2,989
304.02	Low	No	35.85	\$61,800	\$22,155	3,584	98.47	3,529
305	Low	No	48.74	\$61,800	\$30,121	4,686	86.62	4,059
306	Moderate	No	52.65	\$61,800	\$32,538	8,694	80.48	6,997
308.01	Low	No	49.44	\$61,800	\$30,554	7,181	70.71	5,078
308.02	Moderate	No	73.43	\$61,800	\$45,380	6,241	28.2	1,760
309.02	Upper	No	138.15	\$61,800	\$85,377	3,515	18.32	644
309.03	Middle	No	100.2	\$61,800	\$61,924	3,496	33.01	1,154
309.04	Upper	No	134.41	\$61,800	\$83,065	4,499	14.87	669
310.01	Middle	No	89.47	\$61,800	\$55,292	2,511	33.37	838
310.02	Middle	No	85.97	\$61,800	\$53,129	4,212	24.36	1,026
311.01	Upper	No	158.82	\$61,800	\$98,151	2,300	11.52	265
311.02	Upper	No	124.84	\$61,800	\$77,151	3,542	17.56	622
312.02	Middle	No	119.29	\$61,800	\$73,721	6,136	11.75	721
312.03	Upper	No	185.46	\$61,800	\$114,614	1,288	8.39	108
312.04	Middle	No	92.32	\$61,800	\$57,054	2,870	10.7	307
312.05	Middle	No	95.68	\$61,800	\$59,130	1,739	12.65	220
502.04	Middle	No	96.7	\$61,800	\$59,761	5,449	40.08	2,184
502.05	Middle	No	103.06	\$61,800	\$63,691	2,553	26.52	677
502.06	Middle	No	102.25	\$61,800	\$63,191	3,202	41.54	1,330

Source: Federal Financial Institutions Examination Council, 2014 Census Report

A tool utilized in measuring levels of segregation is the Dissimilarity Index, which indicates whether one particular group is distributed across census tracts in a metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. A value of 60 (or above) is considered very high. It means that 60% of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low.

The following figure from Brown University’s Spatial Structures in the Social Sciences (S4) initiative indicates that Pompano Beach maintains high levels of segregation according to the Dissimilarity Index. In 1980, the level of segregation between Whites and Blacks was extremely high at 91.5 and remained high in 1990 at 84. This level has dropped considerably since the 2000 Census (79.3) and continued to drop to a historic low of 63.7 in the 2010 Census. While 63.7 is still considered to be a high level of segregation, it is a 19% decrease from the 2000 level and is a 30% decrease from 1980.

Figure: Dissimilarity Index, Pompano Beach

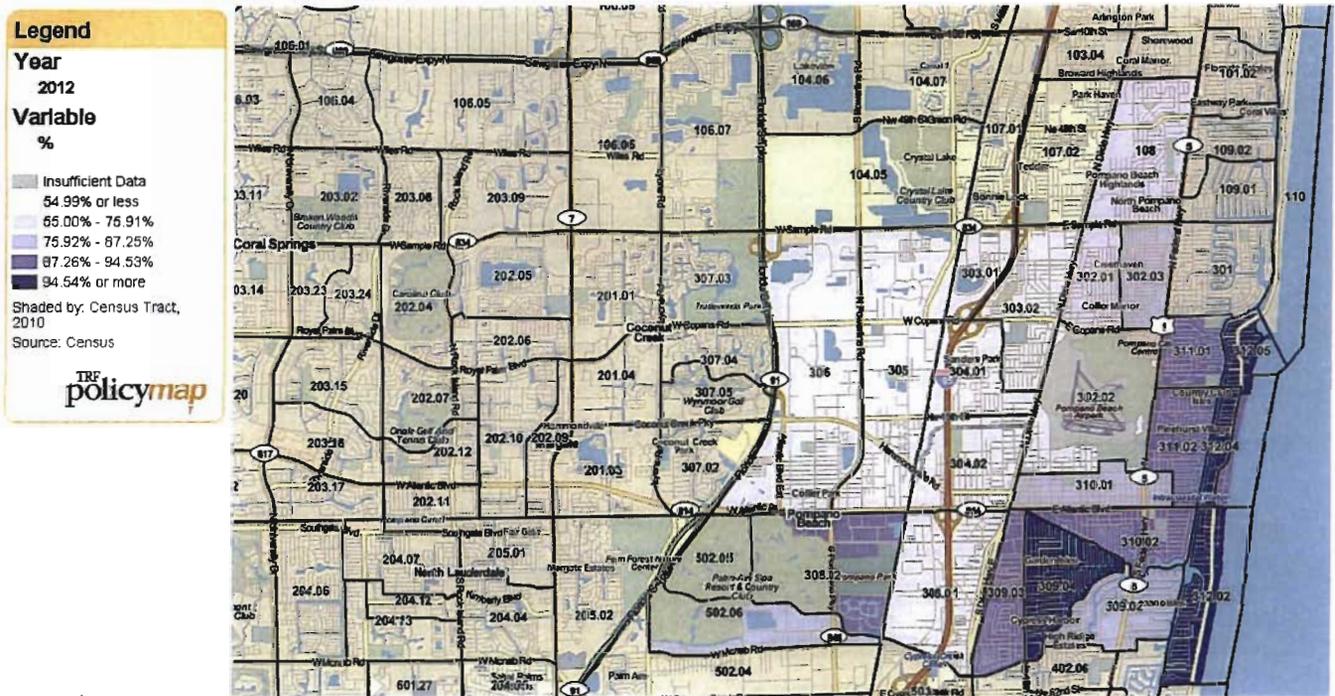


Source: Brown University, Spatial Structures in the Social Sciences, US2010

White-Hispanic segregation has increased since 1980 from 35.6 to 38.5 in 2010 and remained just below the moderate level threshold, while White-Asian levels have fluctuated from a high of 40.2 in the 2005-2009 ACS to a low of 20.9 in 2010, a 48% decrease. In 2010, the level of segregation between Blacks and Hispanics was at the moderate level of 41.4, a 42% decrease from the 72.1 level in 2000.

The following maps show the distribution of racial and ethnic groups within the City of Pompano Beach by 2010 census tract boundaries. The maps indicate a dense clustering of racial groups in certain census tracts. The demographic information in these maps is based on the 2008-2012 ACS.

Graph: Percentage of Whites, Pompano Beach



E. Income, Education, and Employment

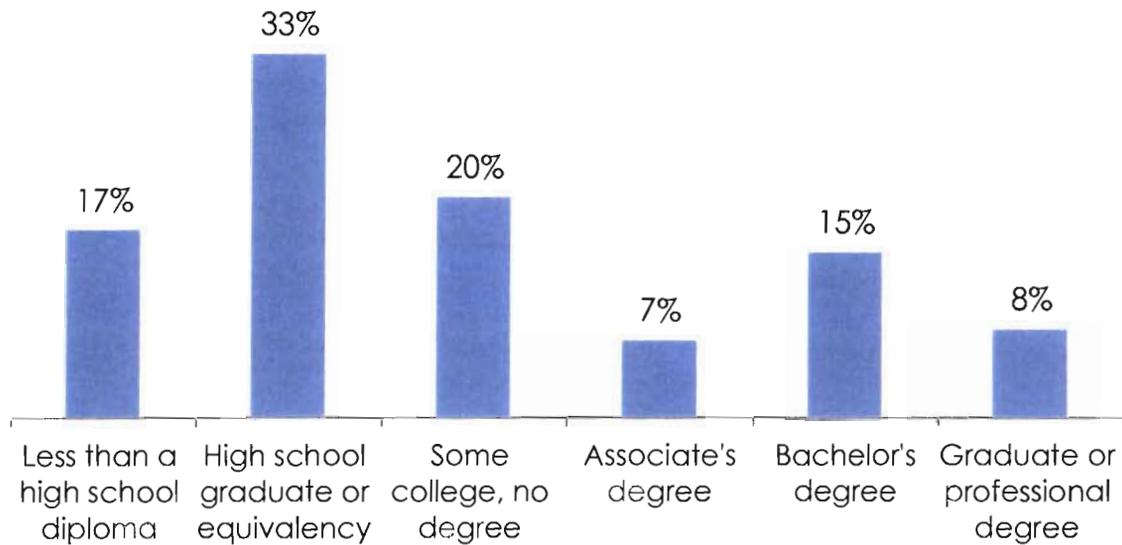
According to the 2009-2013 ACS, the median household income in Pompano Beach was \$40,221, representing an 11% increase over the 2000 median income of \$36,073. The median household income for Broward County in the latest 5-year Census was \$51,251. 69.9% of Pompano Beach households reported receiving earnings and 15% received retirement income other than Social Security. Roughly 34% (14,118 households) of households in Pompano Beach received Social Security. The average income from Social Security was about \$17,010.

In 2013, 22.5% of households were living below the poverty level in Pompano Beach. Comparable figures for Broward County estimate that 14.3% of the County's population was living below the poverty level.

The City's approximate unemployment rate in the 2009-2013 ACS was 8.5% (7,172 residents) compared to Broward's 8.0% and Florida's 7.0%.

In the 2009-2013 ACS, 82% of people 25 years and over in Pompano Beach had completed high school and higher, compared to 87% in Broward and 86% in Florida. 23% of Pompano Beach's residents had a bachelor's degree or higher, compared to 29% in Broward and 26% in Florida. The City's total school enrollment was just over 20,000, of which 5,039 were enrolled in college or graduate school.

Figure: Level of Educational Attainment, Pompano Beach

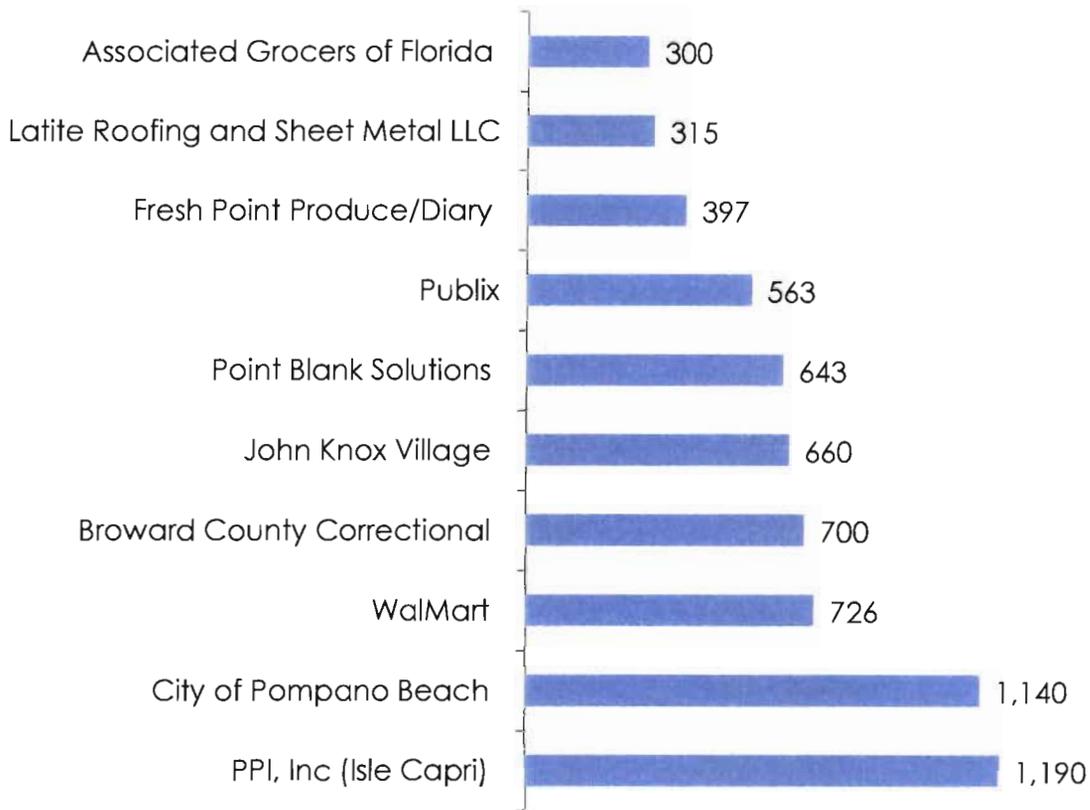


Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

For the employed population, 16 years and older, some of the leading industries in Pompano Beach include educational and health care services (17%), the retail trade (13%), and professional, scientific, management, and administrative and waste management services (12%). Other industrial sectors include the arts, entertainment, recreation, accommodation, and food services sector (11%) as well as construction (10%).

Most of the City's workers (82%) earn a private wage and salary according to the 2013 ACS. 7% are self-employed and 9% are Federal, state, or local government workers. Some of the City's largest employers are listed in the figure below.

Figure: Top Employers in Pompano Beach by Number of Employees



Source: City of Pompano Beach, 2013 Comprehensive Annual Financial Report

F. Transportation and Commuting

A significant majority of Pompano Beach’s employees drive alone to work for their commute. According to the 2009-2013 ACS, 31,867 (75%) of workers in Pompano Beach drove alone to work and 5,252 (13%) carpooled. Additionally, just 608 (1.4%) employees walked to work and 1,850 (4.4%) took public transportation to work. Interestingly, Pompano Beach has a higher percentage of workers walking and utilizing public transportation in their commute than Broward County. In Broward County, only 1.3% of employees walk to work and 2.9% rely on public transit for their commute.

Census data further indicates that Pompano Beach’s mean travel time to work is 24.8 minutes, which is slightly lower than the mean travel time to work for Broward County (27.2 minutes) and Florida (25.9 minutes).

A 2011 study by the Center for Housing Policy and Center for Neighborhood Technology estimates that transportation costs account for as much as 32% of the monthly income of moderate-income

households in the Miami-Fort Lauderdale-Pompano Beach metropolitan area. According to the study, the Miami metro area has the highest combined housing and transportation costs in the US, with moderate-income households spending approximately 72% of household income on housing and transportation costs.

The Broward Housing Council and FIU Metropolitan Center in their *2014 Broward County Affordable Housing Needs Assessment*, estimate the combined housing and transportation cost burden in Pompano Beach is 54% of household income in 2014. The Housing and Transportation (H+T) Affordability Index considers the combined costs of transportation and housing to be affordable at 45% of household income.

G. Housing Supply: Providing Housing Options

According to the *2014 Broward County Affordable Housing Needs Assessment*, there are significant gaps in the number of affordable owner and renter housing in the very low and low household income categories. The report’s analysis of Pompano Beach’s affordable rental housing demand/supply suggests that the current supply of affordable rental housing is insufficient to meet the demands of very low and low-income renter households.

Table: Housing Supply/Demand Analysis, Pompano Beach Renters

	Income	Demand	Affordable Rent		Supply	Surplus/Gap
Very Low Income	31-50% AMI		31% AMI	50% AMI	31-50% AMI	
	\$12,293 - \$19,828	1,879	\$307	\$496	304 (2%)	(1,575 units)
Low Income	31-50% AMI		51% AMI	80% AMI	31-50% AMI	
	\$20,225-\$31,725	2,942	\$506	\$793	2,572 (16%)	(367 units)
Moderate Income	81-120% AMI		81% AMI	120% AMI	81-120% AMI	
	\$32,121-\$47,587	2,769	\$803	\$1,189	6,047 (38%)	(3,278 units)

Source: Broward Housing Council, 2014 Broward County Affordable Housing Needs Assessment

Table: Housing Supply/Demand Analysis, Pompano Beach Owners

	Income	Demand	Home Purchase at Affordable Price Levels		Supply	Surplus/Gap
			31% AMI	50% AMI		
Very Low Income	31-50% AMI		31% AMI	50% AMI	31-50% AMI	
	\$12,293 - \$19,828	4,600	\$30,733	\$49,570	667 (3%)	(3,933 units)
Low Income	31-50% AMI		51% AMI	80% AMI	31-50% AMI	
	\$20,225-\$31,725	6,440	\$50,563	\$79,313	2,247 (9%)	(4,193 units)
Moderate Income	81-120% AMI		81% AMI	120% AMI	81-120% AMI	
	\$32,121-\$47,587	6,512	\$80,303	\$118,968	3,054 (12%)	(3,458 units)

Source: Broward Housing Council, 2014 Broward County Affordable Housing Needs Assessment

The report suggests there are also significant gaps in the supply of affordable owner housing for very low, low, and moderate-income households in Pompano Beach.

An indicator of new housing production is the number of residential permits issued in a year. Interestingly, there was a slight decrease in new residential permits issued in Pompano Beach from 363 units in 2013 to 281 in 2014, according to preliminary data from the State of the Cities Data Systems (SOCDS) Building Permits Database. However, both years are a significant increase from the 46 units issued building permits in 2011 and 11 in 2010. Of the 363 units issued building permits in 2013, 312 units were in multi-family structures and 51 units in single-family structures.

Of Pompano Beach’s existing housing supply (56,613 total housing units), 61% of units are in multi-unit structures, 34% are in single-unit structures, and 2% are in mobile homes. The City’s estimated vacancy rate is 11% for rentals and 5% for single-family properties, according to the latest five-year Census data.

Table: Type of Housing, Pompano Beach

Type of Housing	Number of Units	% Of Total
Single Family (detached and attached)	18,961	34%
Duplex	1,674	3%
Multifamily (3 or more units)	34,756	61%
Mobile Home	1,139	2%
Other	83	0%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

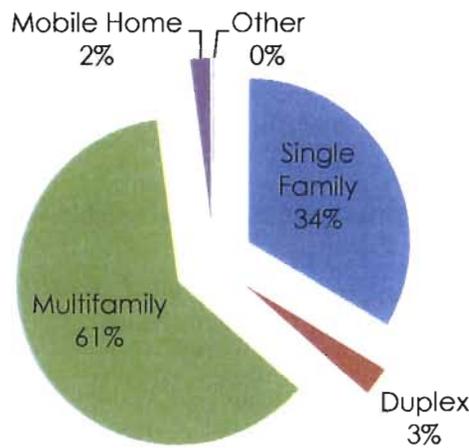


Figure: Type of Housing, Pompano Beach

Most (54% or 30,797 units) of Pompano Beach’s housing structures were built between 1960 and 1979. 31% of the City’s housing stock was built in the 1970s and nearly 23% between 1960 and 1969. Approximately, 7% (4,263 units) of the City’s housing stock was built after 2000.

According to the Housing Element of the City of Pompano Beach Comprehensive Plan, the City’s last housing condition survey was prepared in 1994. At that time, 75% of Pompano Beach’s total 1,225 substandard units were located in just three census tracts: 303, 306, and 308.01. More recent Census data suggests that there are approximately 3,024 occupied units in Pompano Beach that are qualify as substandard due to being overcrowded, not having heat, or lacking complete kitchens or plumbing.

Table: Housing Condition Characteristics (Occupied Units)

Condition Characteristics	Units	% Of Occupied Units
1.01 or More Persons per Room	1,617	4%
No Housing Heat Fuel Used	891	2%
Lacking Complete Kitchen Facilities	387	0.9%
Lacking Complete Plumbing Facilities	129	0.3%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

H. Housing Tenure

According to the 2009-2013 ACS, Pompano Beach has a total of 56,613 housing units, 27% of which are vacant. Of the 40,883 occupied housing units in Pompano Beach, approximately 57% (23,355) is owner occupied and 43% (17,528) renter occupied. Comparable 2009-2013 ACS figures for Broward County indicate 66% (437,074) of occupied units are owner occupied and 34% (226,384) are renter occupied. The 2010 Census suggests a 4% increase in the number of renter occupied units in Pompano Beach as well as a 3% decrease in the percentage of owner occupied units since the Census 2000 count.

Table: Housing Tenure

Housing Tenure	Number of Units	% Of Total
Owner Occupied	23,355	57%
Renter Occupied	17,528	43%
Total Housing Units	40,883	100%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

Table: Housing Tenure Census 2000 and 2010

Housing Tenure	2000	2010
	Number of Units	Number of Units
Owner Occupied	22,110 (63%)	24,992 (59%)
Renter Occupied	13,087 (37%)	17,190 (41%)
Total Occupied Housing Units	35,197 (100%)	42,182 (100%)

Source: U.S. Census Bureau, 2000 and 2010 Census

Table: Housing Occupancy

Housing Occupancy	Number of Units	% Of Total
Occupied Housing Units	40,883	72%
Vacant Housing Units	15,730	28%
Total Occupied Housing Units	56,613	100%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

I. Housing Affordability

The Center for Housing Policy's 2014 *Housing Landscape* report indicates that the Miami-Fort Lauderdale-Pompano Beach metropolitan area is the least affordable housing market in the US for moderate-income households. According to their research, 38% of working households in the greater Pompano Beach metropolitan area are spending more than half of their monthly income on housing costs.

Housing costs totaling more than 30% of a family's monthly income are generally considered not affordable, since this leaves inadequate funds to cover other necessities such as food, clothing, education, and health care. The most recently released five-year Census data indicates that a majority (59%) of occupied rental units in Pompano Beach are considered cost burdened, spending more than 35% of their income on housing costs. Approximately 32% of the City's occupied rental units have rents that are considered affordable and consume less than 30% of monthly household income on housing.

Table: Rental Rate

Monthly Gross Rent	Number of Units	% Of Total
Less than \$200	66	0%
\$200 to \$299	159	1%
\$300 to \$499	393	2%
\$500 to \$749	1,670	10%
\$750 to \$999	4,995	28%
\$1,000 or more	9,432	54%
No rent paid	813	5%
Total	17,528	100%
Median Rent	\$1,064	

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

In the following table from the Florida Housing Data Clearinghouse, Pompano Beach’s 43,660 households are organized by household income as a percentage of the Area Median Income (AMI) and housing cost burden. In Pompano Beach and the surrounding metro area, the HUD-estimated median income monthly income of a family of four is \$61,800 in 2014.

Table: Households by Income and Cost Burden, 2013

Household Income	0-30%	30-50%	50% or more
<=30% Area Median Income	830	664	7,750
30.01-50% Area Median Income	1,705	2,812	3,320
50.01-80% Area Median Income	3,505	3,111	1,773
80.01+% Area Median Income	14,783	2,751	656
Total	20,823	9,338	13,499

The HUD-estimated median monthly income in Pompano Beach for 2013 was \$61,700.

Source: Florida Housing Data Clearinghouse, 2015

In 2013, almost 30% (13,499) of all of Pompano Beach households, owners and renters, were considered severely cost-burdened, spending at least half of their monthly household income on housing costs. An additional, 9,338 or 21% of households in Pompano Beach were considered cost burdened, spending between 30 to 50% of household income on housing costs. 20,823 households or nearly 47% are in housing that is considered affordable. The Florida Housing Data Clearinghouse indicates that at least 52% or 22,837 households were considered either cost burdened or severely cost burdened and 48% (20,823) were spending 30% or less of their household income on housing costs.

84% (7,750) of Pompano Beach’s 9,244 extremely low-income households (0-30% AMI) qualified as severely cost burdened and approximately 7% as cost burdened. 36% of Pompano Beach’s total 7,837 very low-income (30-50% AMI) households were cost burdened and 42% or 3,320 are severely cost burdened. 37% (3,111) of Pompano Beach’s low-income population (50-80% AMI) was cost burdened and 21% was considered severely cost burdened. Most (86%) of moderate-income (80 to 120% AMI) households and above were spending less than 30% of their monthly income on housing costs. 15% (2,751) of moderate-income households were considered cost burdened.

Table: Value of Owner-Occupied Housing

Value of Specified Owner-Occupied Units	Number of Units	% Of Total
Less than \$50,000	1,710	7%
\$50,000 to \$99,999	4,286	18%
\$100,000 to \$149,999	4,672	20%
\$150,000 to \$199,999	4,180	18%
\$200,000 to \$299,999	3,751	16%
\$300,000 to \$499,999	2,964	13%
\$500,000 or more	1,792	8%
Total	23,355	100%
Median Value	\$159,700	

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

According to the latest 2009-2013 5-year Census data, the City’s median value of owner-occupied housing is \$159,700, which is almost a 29% decrease from the median value (\$226,700) reported in the 2005-2009 5-year Census. The latest 5-year Census estimate is also lower than the median value of owner-occupied housing in Broward County (\$181,500) and Florida (\$160,200).

J. Housing Needs of Disabled Persons

A person with a disability is someone who is determined to:

- Have a physical, mental or emotional impairment that:
 - Is expected to be of long-continued and indefinite duration;
 - Substantially impedes his or her ability to live independently; and
 - Is of such a nature that the ability could be improved by more suitable conditions; or
- Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C 6001-6007); or
- Be the surviving member or members of any family that had been living in an assisted housing unit with the deceased member of the family who had a disability at the time of his or her death.

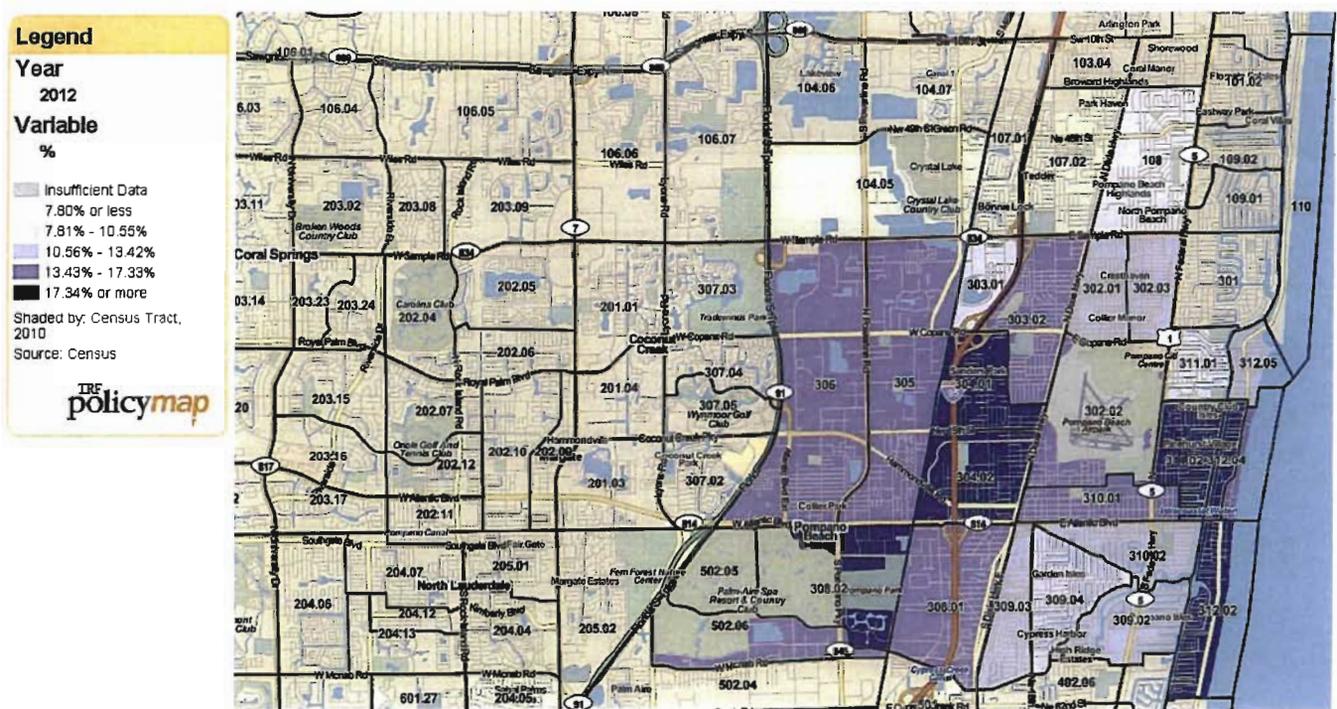
The Census 2000 shows 10,241 persons with a disability in Pompano Beach. More recent 2009-2013 ACS data indicates there are 15,209 persons with a disability in the City, of which 7,506 or roughly 49% is between the ages of 18 to 64 years old. Approximately 7,119 or 47% is 65 years old and over. The latest 5-year ACS estimates that persons with disabilities comprise 15% City’s civilian non-institutionalized population.

The only federally subsidized units in Pompano Beach specifically targeted to persons with disabilities are in the New Vistas development. (16 assisted units). Two other assisted housing properties in Pompano Beach - Highland Gardens and St. Elizabeth Gardens - include units for the elderly over the age of 62, of which some qualify as disabled.

As stated in the City's most recent *Consolidated Plan*, Pompano Beach will continue to support countywide programs for persons with disabilities as well as continue to implement its Removal of Architectural Barriers program for households that need home modifications. The Removal of Architectural Barriers program uses CDBG funds to remove material and architectural barriers that restrict the mobility and accessibility of handicapped and elderly persons to publically or privately owned buildings and facilities.

Below is a map that shows the estimated percentage of Pompano Beach's civilian non-institutionalized population with one or more types of disabilities between 2008 and 2012 by census tract. The map shows a strong concentration of people with a disability in various tracts, including 304.01, 304.02, 308.02 311.02, 312.02, 312.04 and 502.05.

Graph: Percentage of People with a Disability, Pompano Beach



K. Homelessness

The City of Pompano Beach participates in the Broward County Continuum of Care. According to Broward County's 2013 Homeless Point-in-Time (PIT), there are approximately 829 unsheltered homeless in Broward County, of which 99 (12%) were identified within Pompano Beach. The 2014 PIT indicates there are 2,766 homeless throughout the County, approximately 879 are unsheltered and 1,887 sheltered. It is important to note that on-the-street homelessness is difficult to quantify for various reasons, including the spatial fluidity of the problem itself. The following tables identify the inventory and gaps in housing for various homeless populations as well as the most recently released homeless population data.

Table: Housing Gaps Analysis Chart 2007 (Rev.), Broward County Continuum of Care

		Current Inventory in 2005	Under Development in 2005	Unmet Need/ Gap
Individuals				
Example	Emergency Shelter	100	40	26
Beds	Emergency Shelter	741	10	74
	Transitional Housing	1,963	0	74
	Permanent Supportive Housing	456	129	354
	Total	3,160	139	493
Persons in Families With Children				
Beds	Emergency Shelter	205	20	250
	Transitional Housing	326	0	375
	Permanent Supportive Housing	938	4	375
	Total	1,469	24	100

Source: Broward County Homeless Initiative Partnership (HIP), 2004.

Table: Homeless Populations and Subpopulations, Broward County Continuum of Care

Homeless Populations	Emergency Shelter	Transitional Housing	Unsheltered	Total
Households without children	638	548	759	1,945
Households with at least one adult and one child	87	124	14	225
Households with only children	7	1	15	23
Total Homeless Households	732	673	788	2,193
Persons in households without children	638	557	810	2,005
Persons in households with at least one adult and one child	272	412	54	738
Persons in households with only children	7	1	15	23
Total Homeless Persons	917	970	879	2,766

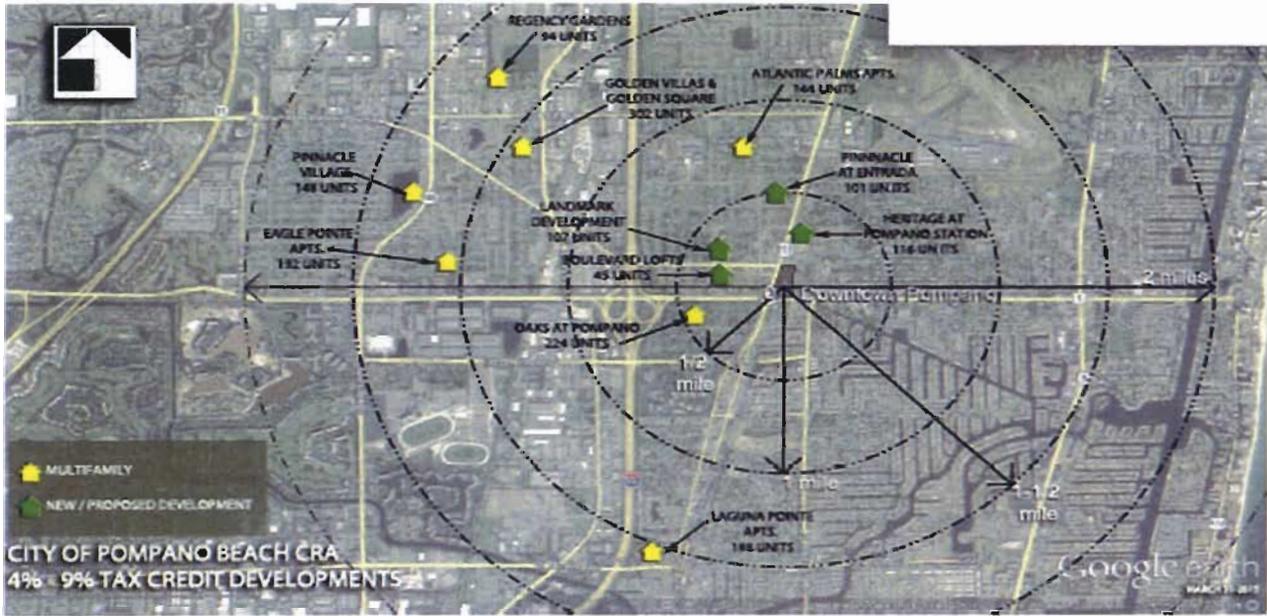
Homeless Subpopulations	Sheltered	Unsheltered	Total Population
Chronically Homeless	169	356	525
Severely Mentally Ill	393	175	568
Chronic Substance Abuse	642	240	882
Veterans	143	86	229
Persons with HIV/AIDS	135	11	146
Victims of Domestic Violence	45	0	45

Source: HUD's 2014 Continuum of Care Homeless Assistance Programs, 2014

L. Public and Assisted Housing

The Table below provides a complete inventory of the federal, state, and locally assisted rental housing stock in the City of Pompano Beach. These 16 housing developments—dispersed throughout the City—provide affordable rental housing for target populations such as families, the elderly, and persons with disabilities. According to the Florida Housing Data Clearinghouse, there are a total of 2,200 assisted housing units in Pompano Beach.

Table: Public and Assisted Housing



Additionally, Pompano Beach has a local Public Housing Authority. The Housing Authority of Pompano Beach (HAPB) administers 1,096 Section 8 housing vouchers. These vouchers provide a subsidy that generally limits tenant contribution to rent to 30% of adjusted household income. Currently, the HAPB does not own or manage any public housing units.

M. Recent Housing Accomplishments

The Golden Square (182 units) and Golden Villas (120 units) developments were completed in Pompano Beach in 2009. The dual new construction projects were a joint venture between Pinnacle Housing Group, a private Miami-based developer, and the HAPB. The Low Income Housing Tax Credit developments replaced the obsolete Blanche Ely public housing complex and utilized 30 acres of undeveloped HAPB-owned land. The 302 total rental units were financed with federal low income housing tax credits, locally issued tax-exempt bonds, as well as other capital sources. Currently, the communities of Golden Square and Golden Villas charge rents from \$742 to \$1,155

per month to those who qualify. A similar prior public/private partnership in Pompano Beach led to the City's selection as a 2006 All American City award winner.

More recently, the City approved a resolution authorizing a HOME funding agreement between the City and Captiva Cove, a new construction affordable rental development of 264 units. The November 2014 resolution provides over \$100,000 in HOME funds for the second phase of the project, which when completed will significantly expand affordable rental opportunities for very-low and low-income households in Pompano Beach.

Table: Inventory of Federal, State, and Local Assisted Rental Housing

Development Name	Street Address	Zip Code	Assisted Units	Target Population
Atlantic Palms	1290 NW 6th Avenue	33060	145	Family
Captiva Cove	1201 S Dixie Highway West	33060	264	Family
Eagle Pointe	2001 W Atlantic Blvd	33069	192	Family
Golden Acres	1050 NW 18th Drive	33069	173	Family; Farmworker
Golden Square	1415 NW 18th Drive	33069	182	Family
Golden Villas	1325 NW 18th Drive	33069	120	Family
Highland Gardens	331 NE 48th Street	33064	100	Elderly; Family
Island Club	3505 West Atlantic Blvd	33069	52	Family
Laguna Pointe	905 SW 15th Street	33060	188	Family
New Vistas	868 SW 10th Street	33060	16	Persons w/ Disabilities
Oaks At Pompano	501 SW First Court	33060	224	Family
Pinnacle Village	801 N Powerline Road	33069	148	Family
Pinnacle Village Apartments	973 N Powerline Road	33069	188	Family
Regency Gardens	1520 NW 17th Avenue	33060	94	Family
St. Elizabeth Gardens	801 NE 33rd Street	33064	99	Elderly
Voa Broward 1 - Pompano Beach	1001 & 1011 NW 6 Avenue	33060	15	Family

Source: Florida Housing Data Clearinghouse, 2015

Table: Federal, State, and Local Assisted Rental Housing Program(s)

Development Name	Housing Program(s)
Atlantic Palms	Housing Credits 9%
Captiva Cove	Housing Credits 4%; State Bonds; State HOME
Eagle Pointe	Guarantee; Housing Credits 4%; SAIL; Section 542; State Bonds
Golden Acres	Rental Assistance/RD; Section 514/516
Golden Square	Housing Credits 9%
Golden Villas	Housing Credits 4%; Local Bonds; Rental Recovery Loan Program; Supplemental
Highland Gardens	Public Housing
Island Club	Local Bonds
Laguna Pointe	Housing Credits 4%; Local Bonds; SAIL
New Vistas	Rental Assistance/HUD; Section 202 Direct Loan
Oaks At Pompano	Housing Credits 4%; Local Bonds
Pinnacle Village	Housing Credits 4%; Local Bonds
Pinnacle Village Apartments	HUD Use Agreement
Regency Gardens	Housing Credits 9%; SAIL
St. Elizabeth Gardens	Rental Assistance/HUD; Section 202 Direct Loan
Voa Broward 1 - Pompano Beach	Demonstration Project; Federal Deposit Insurance Corporation; State HOME

Source: Florida Housing Data Clearinghouse, 2015

The City has previously contributed \$950,000 in HOME funds to the first phase of the development.

According to Pompano Beach's 2013 Annual Community Redevelopment Agency (CRA) report, the City's Northwest and East district CRA is focused primarily on infrastructure improvements, beautification, and economic development. The Northwest CRA is also currently in the process of developing a civic campus, two new art complexes (Ali Cultural Arts Center and the Hotel Bailey Arts Center), and various other community and economic projects. Some of the East district CRA's activities include the restoration and refurbishment a beach dune, façade and business site improvements, and the redevelopment of the Pompano Beach Pier.

Previously, the Northwest CRA has played a crucial role in the construction or planned construction of over 100 single-family homes, 200 townhomes, and 600 apartments throughout the area. The Northwest target area has been a CRA since 1989.

The City was awarded a Neighborhood Stabilization Program (NSP) grant in 2008. Pompano Beach's NSP was extremely successful: a total of 49 homes have been fully renovated or newly built in place of blighted structures of which 24 were sold to local families and individuals.

N. Planning and Zoning Building Codes

In 2013, the Downtown Pompano Beach Transit Oriented Overlay District zoning code was adopted. The overlay is intended to encourage compact mixed-use developments within walking distance to public transit, including the Broward County Transit Center and the proposed future Tri-Rail stop on the Florida East Coast (FEC) Rail Corridor. Affordable mixed-use properties served by mass transit would effectively reduce the Pompano Beach's high combined housing and transportation cost-burden. The Northwest CRA is currently assisting City staff in the implementation and interpretation of the overlay district.

The City's zoning code currently allows multifamily housing in a variety of densities up to RM-45 and smaller lot single-family homes in RS-3 and RS-4. Survey results from the City's planning staff in a previous AI report suggested that geographic location is a larger determining factor of affordability than density alone. For instance, City building and zone codes staff anecdotally point out that an RM-20 zoning district east of the Intracoastal is likely to be more expensive than an RM-20 district west of the Intracoastal and near the FEC railroad.

All of Pompano Beach's codes and regulations are ADA compliant.

O. Market Conditions: Searching for Affordability

The 2014 *Broward County Affordable Housing Needs Assessment* concludes that the housing recovery (i.e. increase in housing prices both rental and homeownership) has been underway in Broward County since 2012. However, the report further finds that income stagnation and the depletion of the more

affordable housing supply are leaving many families vulnerable despite rising home prices, growing demand, and increased construction activity

III. Fair Housing Profile

A. Home Lending Analysis for Pompano Beach

Home Mortgage Disclosure Act (HMDA) lending data indicates there were 754 home purchase loans originated in Pompano Beach in 2013. White applicants comprised nearly 82% of the City’s total loan originations that year while African American applicants made up about 5% and Asians 1%. Roughly 7% of applicants did not provide racially identifying information. Of the 263 denied home purchase loan applications in 2013, most (79%) were also White.

African Americans made up 5% of denied loan applications and Asians 1%. 12% of denied loan applicants did not provide their racial information.

Table: Home Purchase Loan Approval/Denial by Race, 2013

Applicant Race	Loans Originated	Application Denied	Other
American Indian or Alaska Native	0	0	1
Asian	11	3	2
Black or African American	38	14	8
Native Hawaiian or Other Pacific Islander	2	2	2
White	624	210	209
Information not provided by applicant	56	32	23
Not applicable	23	2	2

Source: Florida Housing Data Clearinghouse, 2015

Hispanics or Latinos of any race made up nearly 11% of total loan originations in the City in 2013. Overall, non-Hispanics made up 75% of the total denied applications in 2013 and Hispanics around 14%.

According to the HDMA data, the primary reason for loan application denials in Pompano Beach in 2013 was due to issues with collateral (24%) followed by high debt-to-income ratio (22%). 11% of applications were denied due to poor credit history and 10% were unsuccessful because the applicant failed to complete the application.

Table: Home Purchase Loan Approval/Denial by Hispanic/Latino Ethnicity, 2013

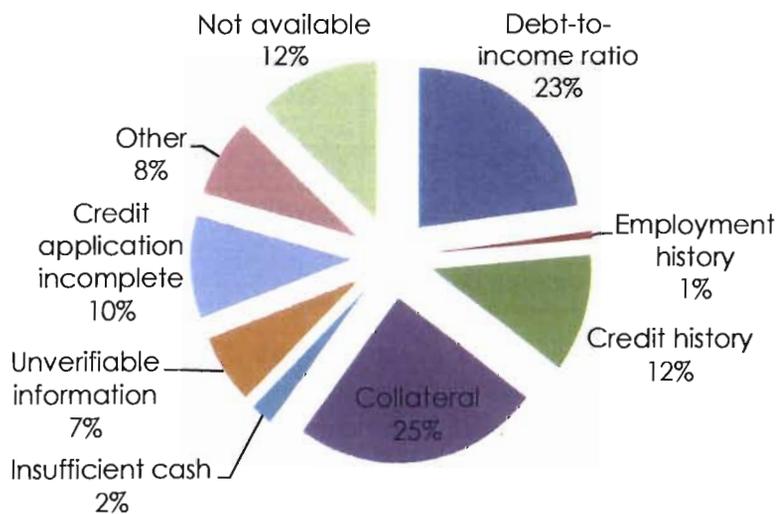
Applicant Race	Loans Originated	Application Denied	Other
Hispanic or Latino	87	38	27
Not Hispanic or Latino	586	198	192
Information not provided by applicant	56	25	26
Not applicable	23	2	2

Source: Florida Housing Data Clearinghouse, 2015

Table: Home Purchase Loan Denial Reasons, 2013

Denial Reason	Applications Count
Debt-to-income ratio	60
Employment history	2
Credit history	31
Collateral	65
Insufficient cash	6
Unverifiable information	18
Credit application incomplete	27
Other	21
Not available	33

Source: Florida Housing Data Clearinghouse, 2015



Below is a breakdown of lending activity in Pompano Beach by census tract income levels from 2007 to 2012. In 2012, 1.99% of loans in this area were in census tracts with median incomes less than \$31,300 or 50% of the Metropolitan Statistical Area's (MSA) median income, which in 2012 was \$62,600. Approximately 23.32% of loans were in tracts with median incomes between \$31,300 and \$50,080 or 50% and 80% of the MSA median income. Roughly 44.11% of loans were in tracts with incomes between \$50,080 and \$75,120 or 80% and 120% of the area's median income. 30.58% of loans went to residents in tracts with incomes greater than 120% of area income (\$75,120 or more).

Table: Lending by Census Tract Income, 2007-2012

Tracts w/ <50% of MSA Median Income	2007	2008	2009	2010	2011	2012
Number of loans	72	18	7	4	5	26
Median Loan Amount	\$160,000	\$110,000	\$113,000	N/A	\$86,000	\$151,000
% of all loans	3.45%	0	0.99%	0.61%	0.83%	1.99%

Tracts w/ <50%-80% of MSA Median Income	2007	2008	2009	2010	2011	2012
Number of loans	658	189	126	119	103	305
Median Loan Amount	\$170,000	\$110,000	\$113,000	\$98,000	\$96,000	\$95,000
% of all loans	31.57%	25.64%	17.85%	18.14%	17.14%	23.32%

Tracts w/ <80%-120% of MSA Median Income	2007	2008	2009	2010	2011	2012
Number of loans	1,112	410	419	358	353	577
Median Loan Amount	\$195,000	\$160,000	\$170,000	\$170,000	\$164,000	\$167,000
% of all loans	53.36%	55.63%	59.35%	54.57%	58.74%	44.11%

Tracts w/ > 120% of MSA Median Income	2007	2008	2009	2010	2011	2012
Number of loans	242	120	154	175	140	400
Median Loan Amount	\$321,000	\$258,500	\$251,500	\$240,000	\$221,000	\$236,500
% of all loans	11.61%	16.28%	21.81%	26.68%	23.29%	30.58%

Source: PolicyMap, HMDA Report of City: Pompano Beach, 2015

This overview indicates a significant decrease in lending activity from 2007 to 2012 in most of the City's tracts regardless of the median income level of the tract. For instance, in census tracts with median incomes between 50% and 80% of the MSA median income, there was nearly a 53% decrease in the number of loans issued between 2007 and 2012, from 658 to 305. A 63% reduction in loan activity occurred in tracts with median incomes less than 50% of the area median while a 48% reduction ensued in tracts with median incomes between 80% and 120% of the MSA median

income. However, in tracts with median incomes more than 120% of the area median income, there was a 65% increase in the number of loans issued, from 242 loans in 2007 to 400 in 2012. In each income tract, 2012 showed the highest amount of lending activity since the collapse of the housing and mortgage markets in 2007.

HMDA includes limited pricing information related to the annual percentage rate (APR) of certain loans. Information on higher rate loans makes it possible to determine differences in loan pricings as well as track disparities in the proportion of loans that were approved or denied among demographic groups. Subprime lending is defined as higher than average rate loans given to persons who are of higher credit risk due to less than satisfactory credit. The higher rate is referred as 'higher cost' and reflects the increased risk of lending to a loan applicant with less than satisfactory credit.

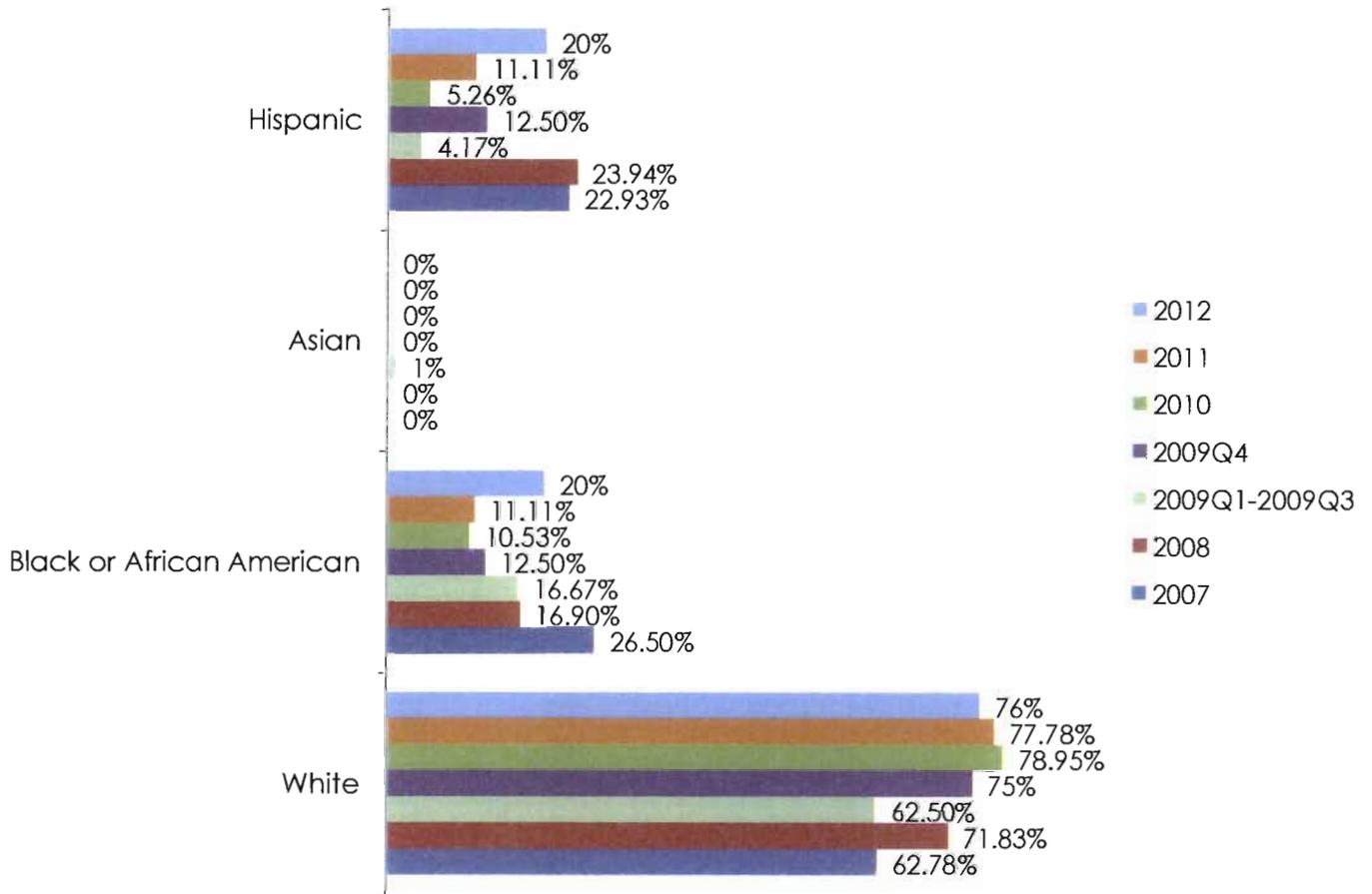
Table: Percentage of High Cost Loans by Race, 2007-2012

Year	White	Black or African American	Asian	Hispanic	Non-Hispanic
2007	62.78%	26.5%	0%	22.93%	69.36%
2008	71.83%	16.9%	0%	23.94%	66.20%
2009Q1-2009Q3	62.5%	16.67%	1%	4.17%	75%
2009Q4	75%	12.50%	0%	12.5%	87.5%
2010	78.95%	10.53%	0%	5.26%	84.21%
2011	77.78%	11.11%	0%	11.11%	77.78%
2012	76%	20%	0%	20%	80%

Source: Policy Map, HMDA Report of City: Pompano Beach, 2015

White loan applicants had the highest rate of subprime/high cost loans in Pompano Beach in 2012 at 76% (19 loans) of all its racial category originations. African Americans and Hispanics had the second largest rate of subprime/high cost loans with both groups at 20% while Asian loan originations had the lowest rate of subprime/high cost loans at 0%. In 2012, the median high cost/subprime loan for White applicants was \$129,000. In that same year, the median value subprime/high cost loan for African Americans was \$78,000 and \$108,000 for Hispanics.

Figure: Comparison of Rate of High Cost Loans by Race, Pompano Beach



B. Foreclosure Data

The Broward Housing Council’s *2014 Broward County Affordable Housing Needs Assessment* indicates that home foreclosure activity in Broward County has improved slightly in the past two years. However, the County’s foreclosure rate of 1 in 310 properties is still considered high. As of April 2014, Pompano Beach had the third highest foreclosure rate in the County with about 1 in every 305 properties in foreclosure. At that time, the City’s foreclosure rate was preceded by far higher rates in Deerfield Beach (1 in every 523 properties) and Dania Beach (1 in every 456 properties) and was just behind Fort Lauderdale’s rate of 1 in every 307 properties, according to RealtyTrac.

C. Broward County Civil Rights Office Complaints

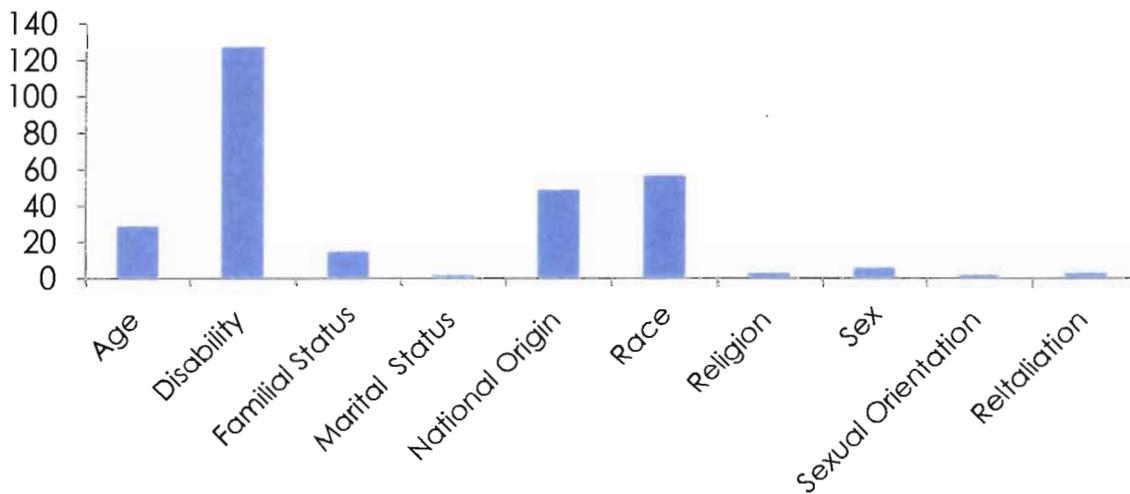
Broward County received 294 housing complaints between October 2010 and September 2015. Disability was the most common basis of discrimination complained of (128 or 43%), followed by Race (57 or 19%), National Origin (49 or 17%), and Age (29 or 10%).

Table: Broward County Complaints 10/2010 – 9/2015

Basis of Complaint	Count
Age	29
Disability	128
Familial Status	15
Marital Status	2
National Origin	49
Race	57
Religion	3
Sex	6
Sexual Orientation	2
Retaliation	3
Total	294

Source: Broward County Civil Rights Division, 2015

Figure: Number of Complaints 10/2010 – 9/2015



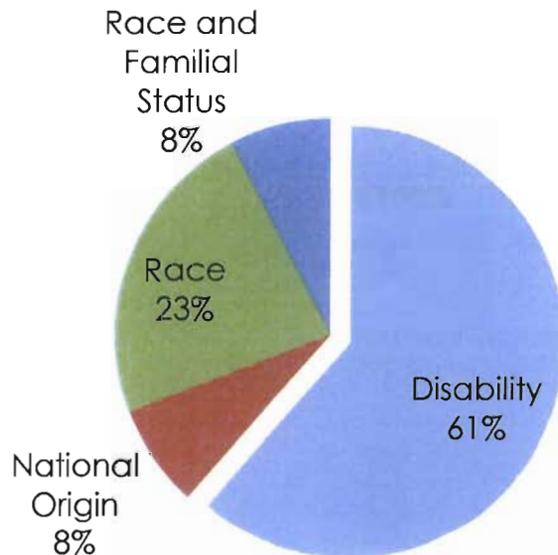
Disability (8 or 61%) was the most common basis of discrimination complaints in Pompano Beach. Race was the second most common basis of discrimination complaints (3 or 23%), followed by National Origin and a dual complaint of Race and Familial Status.

Table: Pompano Beach Complaints 10/2010 – 9/2015

Basis of Complaint	Count
Disability	8
National Origin	1
Race	3
Race and Familial Status	1
Total	13

Source: Broward County Civil Rights Division, 2015

Figure: Number of Complaints, Pompano Beach 10/2010 – 9/2015



69% or 9 out the 13 complaints in Pompano Beach resulted in a judicial consent order conciliated after cause was found. At least 1 complaint successfully reached a settlement/conciliation. Two complaints were withdrawn without a resolution. One complaint was reactivated to HUD (Note: Has an “R” Dismissal Code which is not included in the Closure Codes. HUD Case Number: 041301058 FY2012).

IV. IMPEDIMENTS AND RECOMMENDATIONS

Upon completion of examination of all available data and public comments and input, the following are the key impediments to fair housing choice in Pompano Beach. Each impediment is followed by a specific recommendation to address it.

Impediment #1: Violations of federal and local fair housing laws in the city of Pompano Beach.

Recommendation: The City of Pompano Beach should continue to enforce local, state and federal fair housing laws by reporting violations and allegations of violations to the appropriate government agency.

Impediment #2: Awareness of fair housing laws, issues, potential violations and resources appears to be limited.

Recommendation: The City of Pompano Beach should continue to provide information on fair housing laws to the public, its staff, Realtors, property owners and lenders through educational activities including workshops, public service announcements and presentations to targeted groups.

Impediment #3: Continued disparity by race in mortgage origination and access to non-predatory loans.

Recommendation: The City of Pompano Beach should continue to provide educational fair housing and fair lending materials to local lenders and support homebuyer workshops that provide education to homebuyers.

Impediment #4: Continued concentration of racial minorities in low-opportunity communities.

Recommendation: The City should continue to promote efforts to desegregate communities through educational efforts to expand opportunities in all communities throughout the city.

Impediment #5 : Lack of adequate capital resources to address affordable housing gap.

Recommendation: Continue to work with all development stakeholders in the city and region to promote affordable housing development. The City should strategically utilize local resources including the CRA, housing trust fund and the potential Broward County Linkage Fee to address gaps in affordable housing development projects.

APPENDIX A: Public Comments

Comments from the City of Pompano Beach Community Redevelopment Agency

Portions of Pompano Beach has a substantial level of segregation and a significant concentration of minorities. These Census Tracts are all west of the FEC RR. Four of these Census Tracts are low-income. Need is to create a strategy to diversify ethnicity and increase racial diversity as well as raising income levels within these low-income Census Tracts.

Median Household Income for Pompano is \$40,221 as compared to \$51,251 for Broward County. Pompano Beach has a higher unemployment rate than Broward County and the State of Florida. In addition, Pompano Beach has a lower high school graduation rate and a lower rate of achieving a bachelor's degree or higher than Broward County and the State of Florida. Need is to create a strategy to attract more educational institutions, provide more training opportunities and attract more skilled labor to the area.

Report indicates that Pompano Beach's affordable rental housing demand/supply is insufficient to meet the demands of very low and low-income renter households. This is true if demographics and income is the basis for all analysis. The solution is not to build more affordable housing to meet the demand. The need is to create a strategy to reverse the cycle to attract a better housing mix.

Report indicates that more than half of Pompano Beach's housing structures were built between 1960 and 1979 and only 7% were built after 2000. The Need is to focus on renovating existing housing stock, specifically those identified as being substandard. If we continue to build more affordable income restricted units, we are creating the demand. As new units come online, tenants in older units will transition to the newer units; thereby, leaving vacant units to be occupied by more families in the low to very low income range. We need to reverse this downward cycle and look for strategies to create a better income mix.

Fair Housing Survey was placed on the City website. There was one response:

Q1 What is your primary role in the housing industry?

Answered: 1 Skipped: 0

- Advocate
- Construction/Development
- Insurance
- Law/Legal Services
- Lending/Mortgage Ind
- Government employee (no
- Property Management
- Real Estate /Brokerage
- Service Provider
- City of Pompano Beach

Other (please specify)



Answer Choices	Responses	
Advocate	0.00%	0
Construction/Development	0.00%	0
Insurance	0.00%	0
Law/Legal Services	0.00%	0
Lending/Mortgage industry	0.00%	0
Government employee (not City of Pompano Beach)	0.00%	0
Property management	0.00%	0
Real estate sales/Brokerage	0.00%	0
Service provider	0.00%	0
City of Pompano Beach renter or homeowner	0.00%	0

Other (please specify)

100.00%

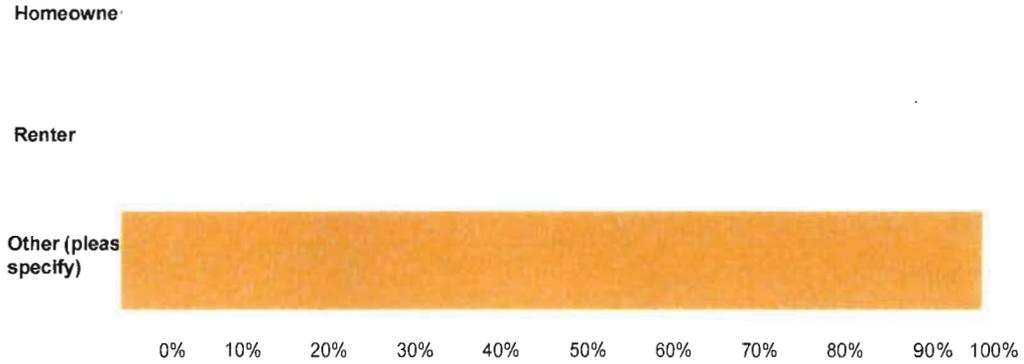
1

Total

1

Q2 In the City of Pompano Beach, are you a

Answered: 1 Skipped: 0



Answer Choices

Responses

Homeowner

0.00%

Renter

0.00%

Other (please specify)

100.00%

Total

1

Q3 How familiar are you with fair housing laws?

Answered: 0 Skipped: 1

! No matching responses.

Answer Choices	Responses	
Very familiar	0.00%	0
Somewhat familiar	0.00%	0
Not familiar	0.00%	0
Total		0

Q4 Do you think fair housing laws are easy to understand and follow?

Answered: 1 Skipped: 0



I do not know

0% 10% 20% 30% 40% 50% 60% 70% 80% 90%
100%

Answer Choices

Yes

No

I do not know

Total

Responses

100.00%

0.00%

0.00%

Q5 Do you believe housing discrimination is an issue in Pompano Beach?

Answered: 1 Skipped: 0

I do not know

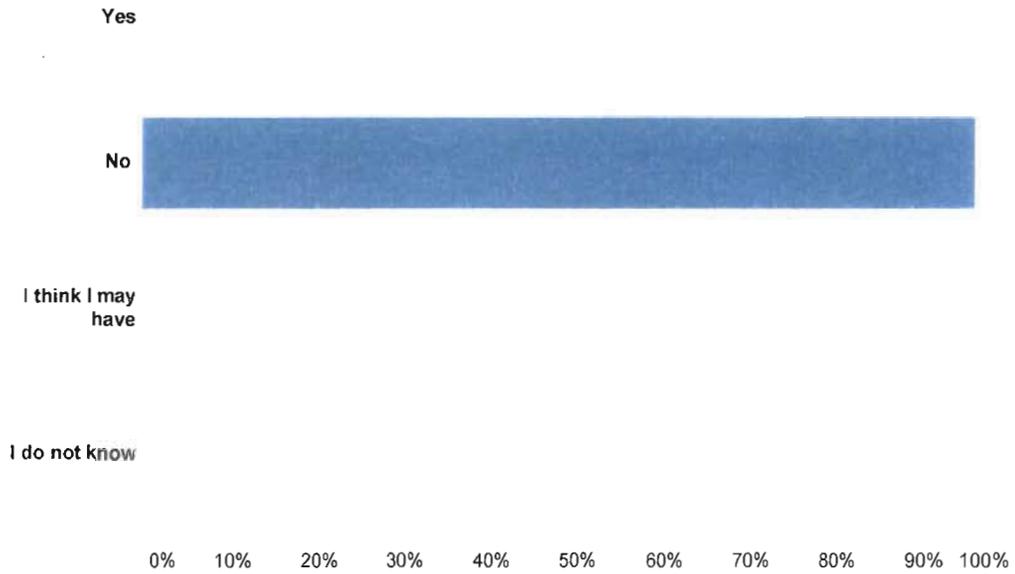


0% 10% 20% 30% 40% 50% 60% 70% 80% 90%
100%

Answer Choices	Responses	
Yes	0.00%	0
No	0.00%	0
I do not know	100.00%	1
Total		1

Q6 Have YOU ever experienced housing discrimination in Pompano Beach?

Answered: 1 Skipped: 0



Answer Choices	Responses	
Yes	0.00%	0
No	100.00%	1
I think I may have	0.00%	0
I do not know	0.00%	0
Total		1

Q7 On what basis do YOU believe you were discriminated against? (Please select all that apply.)

Answered: 0 Skipped: 1

No matching responses

Answer Choices	Responses	
Race	0.00%	0
Color	0.00%	0
National origin	0.00%	0
Religion	0.00%	0
Gender	0.00%	0
Family status (family with children)	0.00%	0
Disability	0.00%	0
Sexual orientation	0.00%	0
Other (please specify)	0.00%	0
Total		0

Q8 If you felt YOUR fair housing rights had been violated, where would you file a complaint?



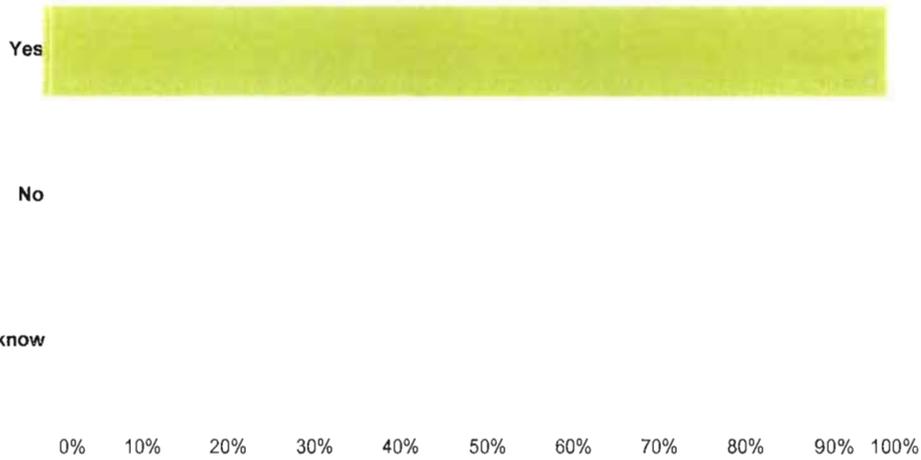
Answer Choices

Responses

Answer Choices	Percentage	Count
City of Pompano Beach	0.00%	0
Broward County	100.00%	1
311 information phone line	0.00%	0
State of Florida	0.00%	0
U.S. Department of Housing and Urban Development (HUD)	0.00%	0
I do not know	0.00%	0
Total		1

Q9 Do you feel fair housing laws are adequately enforced in the City of Pompano Beach?

Answered: 1 Skipped: 0



Answer Choices	Responses	
Yes	100.00%	1
No	0.00%	0
I do not know	0.00%	0
Total		1

Q10 If you had questions about fair housing laws, where would you go?

Answered: 1 Skipped: 0

Internet

City of Pompano Beach

Broward County

311

information...

The local

realtors...

Other (please specify)

00%

Answer Choices

Responses

Internet

100.00%

1

City of Pompano Beach

0.00%

0

Broward County

0.00%

0

311 information phone line

0.00%

0

The local realtors association

0.00%

0

Other (please specify)

0.00%

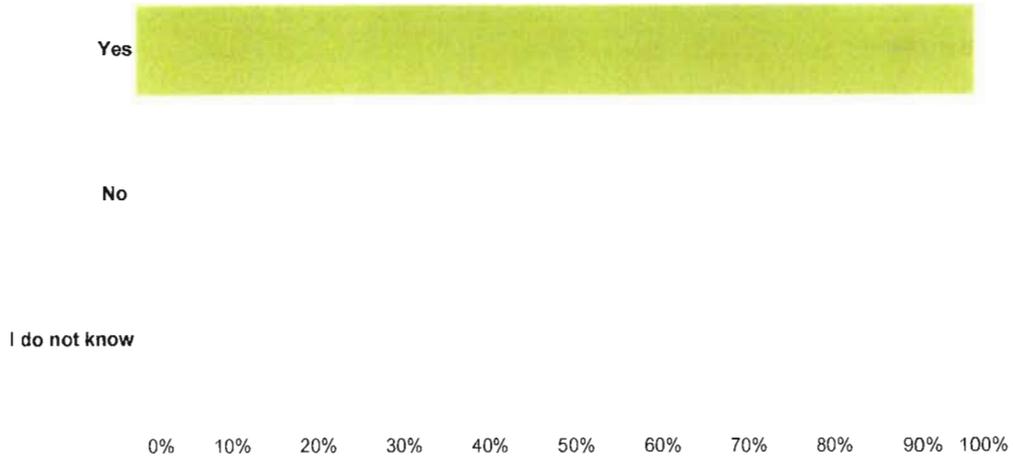
0

Total

1

Q11 Are you aware of any educational activities or training opportunities available to you to learn more about fair housing laws?

Answered: 1 Skipped: 0



Answer Choices

Responses

Yes

100.00%

1

No

0.00%

0

I do not know

0.00%

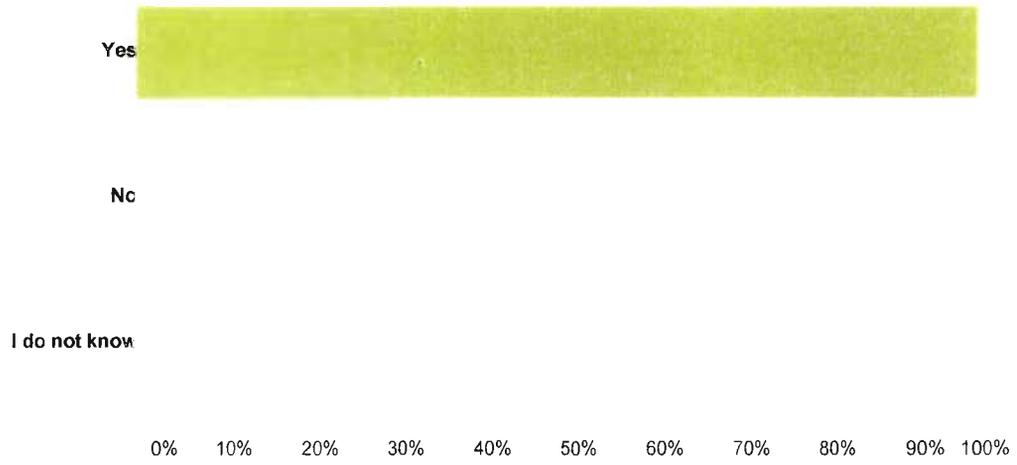
0

Total

1

Q12 If you answered “Yes” to the previous question, can you tell us if you have participated in a fair housing event/activity/training in Pompano Beach before?

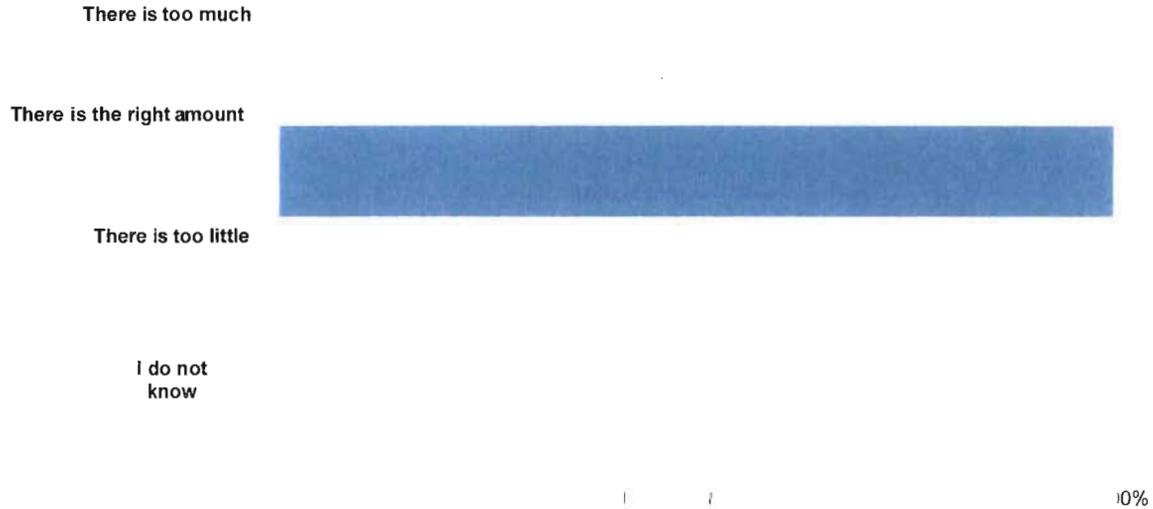
Answered: 1 Skipped: 0



Answer Choices	Responses	
Yes	100.00%	1
No	0.00%	0
I do not know	0.00%	0
Total		1

Q13 Can you provide us with your opinion on the level of fair housing education activities and outreach available in Pompano Beach?

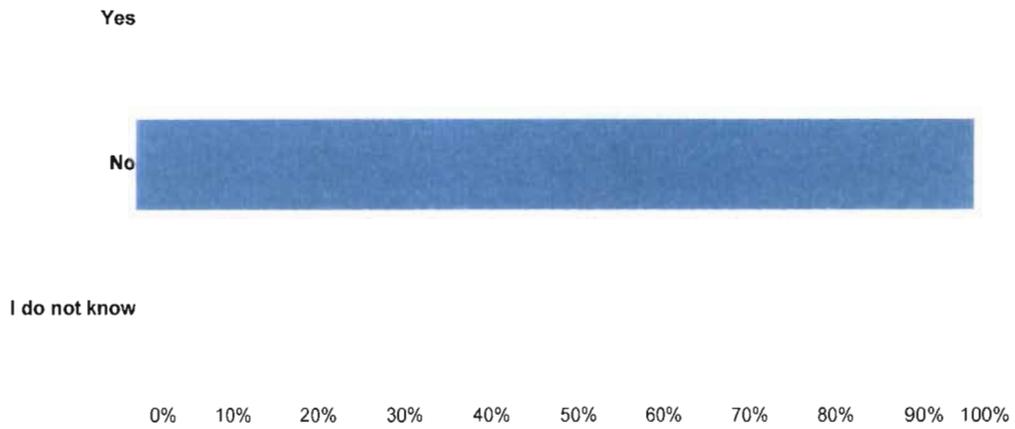
Answered: 1 Skipped: 0



Answer Choices	Responses	
There is too much	0.00%	0
There is the right amount	100.00%	1
There is too little	0.00%	0
I do not know	0.00%	0
Total		1

**Q14 Have you heard of recent fair housing violations in Pompano Beach?
(Example:
on the news, in a newspaper article,
word of mouth.)**

Answered: 1 Skipped: 0



Answer Choices

Responses

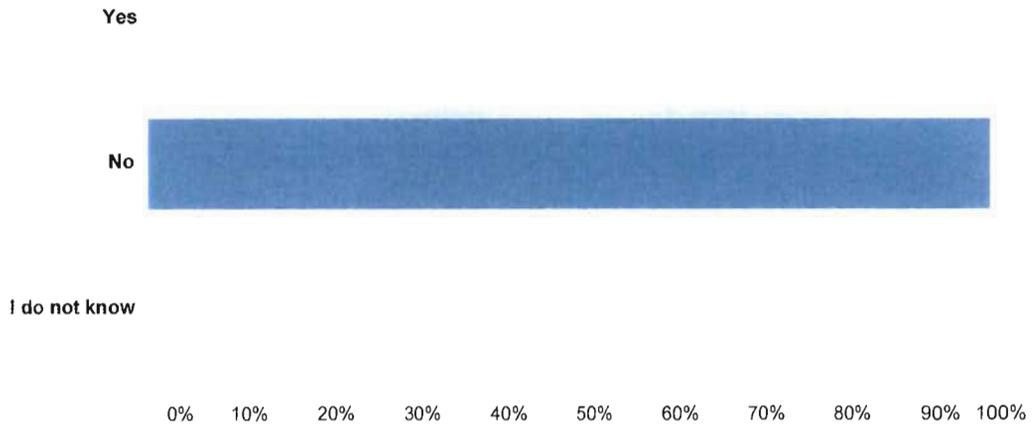
Yes	0.00%	0
No	100.00%	1
I do not know	0.00%	0

Total

1

Q15 Has someone tried to impede/prevent your right to rent a unit at a building in Pompano Beach due to the protected classes (age, color, disability, race, religion, etc.) identified earlier in this survey?

Answered: 1 Skipped: 0



Answer Choices

Responses

Yes

0.00%

0

No

100.00%

1

I do not know

0.00%

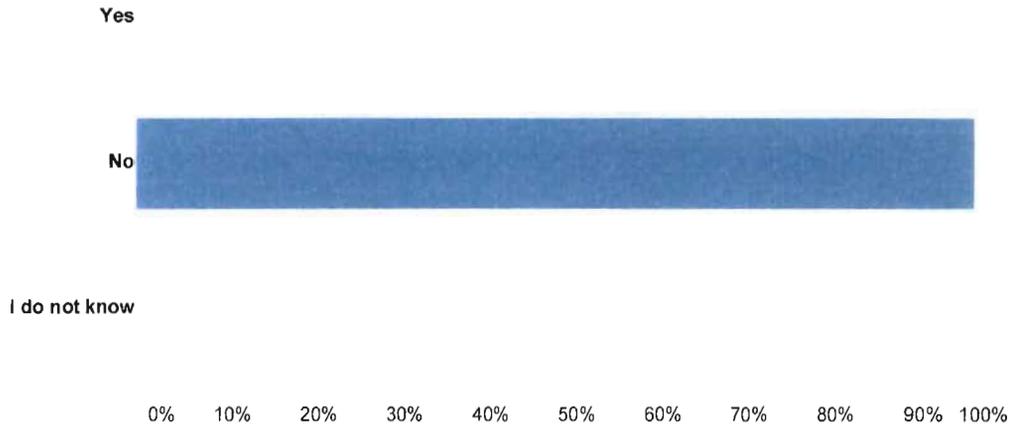
0

Total

1

Q16 Has someone tried to impede/prevent your right to buy a home in Pompano Beach due to one or more of the protected classes (your age, color, race, religion, a disability, etc.) identified earlier in this survey?

Answered: 1 Skipped: 0



Answer Choices

Responses

Yes	0.00%	0
No	100.00%	1
I do not know	0.00%	0
Total		1

**Q17 The real estate industry?
(Example: Only showing properties
to families with children in certain
areas.)**

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

10%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

**Q18 The rental housing market?
(Example: Refusing to rent based on
religion or color.)**

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers to fair housing choice in regard to the rental housing market in the box below:

0.00% 0

Total

1

Q19 The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

Q20 The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility)

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes	0.00%	0
No	100.00%	1
I don't know	0.00%	0
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:	0.00%	0

Total

1

**Q21 The home insurance industry?
(Example: Limiting policies and coverage for racial minorities.)**

Answered: 1 Skipped: 0



If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

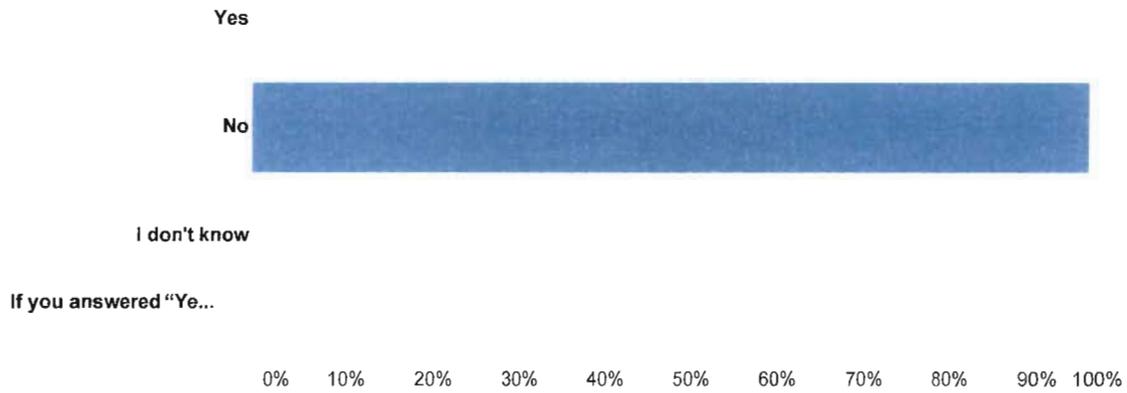
0.00% 0

Total

1

**Q22 The home appraisal industry?
(Example: Basing home values on
the ethnic composition of
neighborhoods.)**

Answered: 1 Skipped: 0



Answer Choices

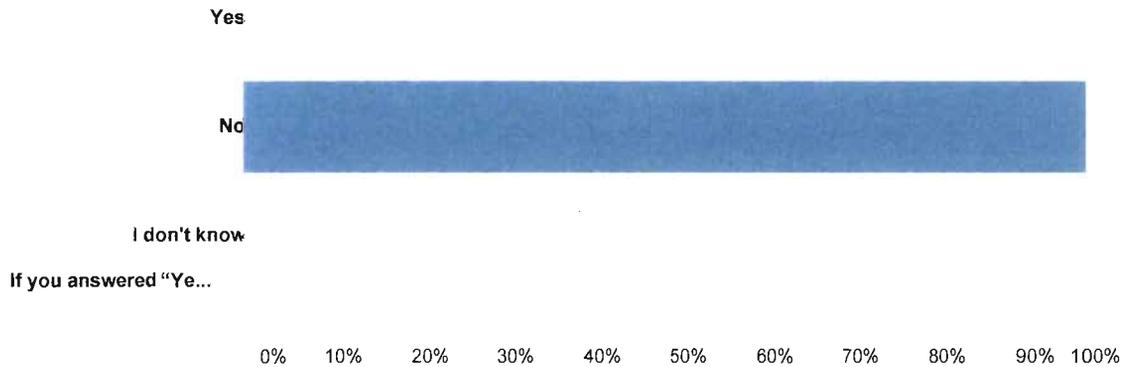
Responses

Yes	0.00%	0
No	100.00%	1
I don't know	0.00%	0
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:	0.00%	0

Total 1

**Q23 Maintenance of foreclosed vacant properties by mortgage lenders?
(Example: Mortgage lender does not maintain certain properties but maintains others that have successfully acquired a judgment of foreclosure.)**

Answered: 1 Skipped: 0



I don't know
If you answered "Ye...

Answer Choices

Responses

Yes	0.00%	0
No	100.00%	1
I don't know	0.00%	0
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:	0.00%	0
Total		1

Q24 Any other housing services?

Answered: 1 Skipped: 0

Yes



No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

Q25 Zoning laws? (Example: Laws that restrict placement of group homes.)

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers to fair housing choice in regard to land use policies in the box below:

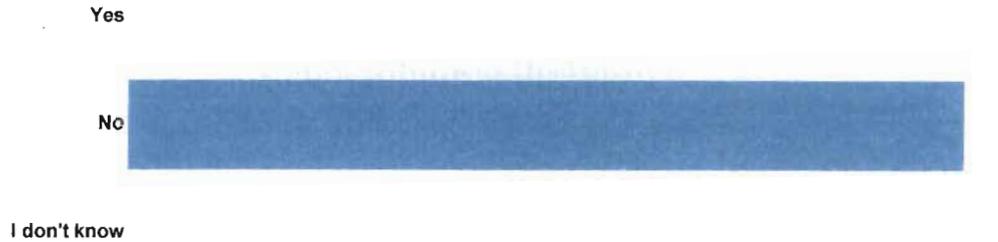
0.00% 0

Total

1

**Q26 Land use policies? (Example:
Policies that concentrate multi-family
housing in limited areas.)**

Answered: 1 Skipped: 0



If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

Q27 Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

10%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

Q28 Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)

Answered: 1 Skipped: 0

Yes



No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices	Responses
Yes	0.00% 0
No	100.00% 1
I don't know	0.00% 0
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:	0.00% 0
Total	1

**Q29 The permitting process? (Example:
Not offering written documents on
procedures in alternate languages.)**

Answered: 1 Skipped: 0

Yes



No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

**Q30 Housing construction standards?
(Example: Lack of or confusing
guidelines for construction of
accessible housing.)**

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

0.00% 0

Total

1

Q31 Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)

Answered: 1 Skipped: 0

Yes

No

I don't know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%



Answer Choices

Responses

Yes

0.00% 0

No

100.00% 1

I don't know

0.00% 0

If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:

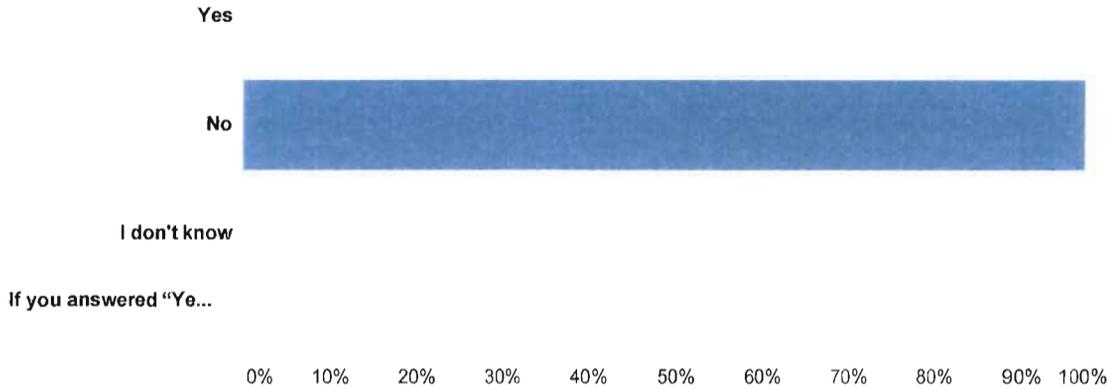
0.00% 0

Total

1

Q32 Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

Answered: 1 Skipped: 0

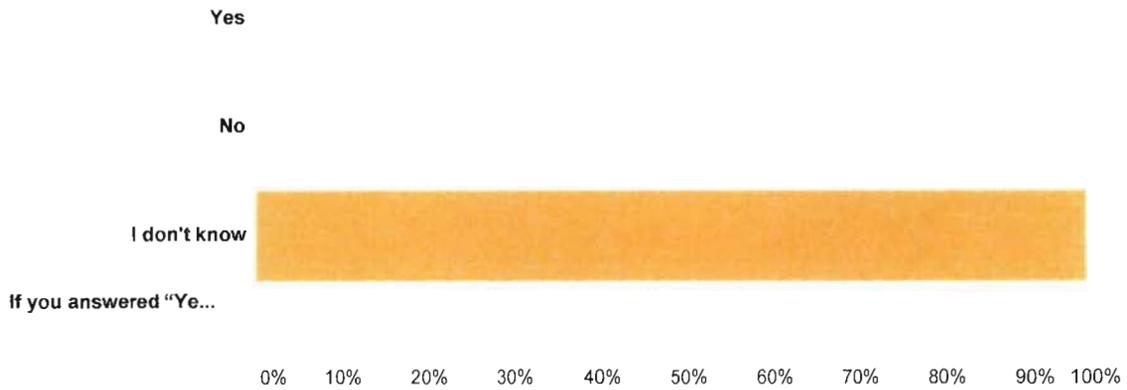


If you answered "Ye..."

Answer Choices	Responses
Yes	0.00% 0
No	100.00% 1
I don't know	0.00% 0
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below:	0.00% 0
Total	1

Q33 Does the quality of the local public school district affect the location of where households choose to live?

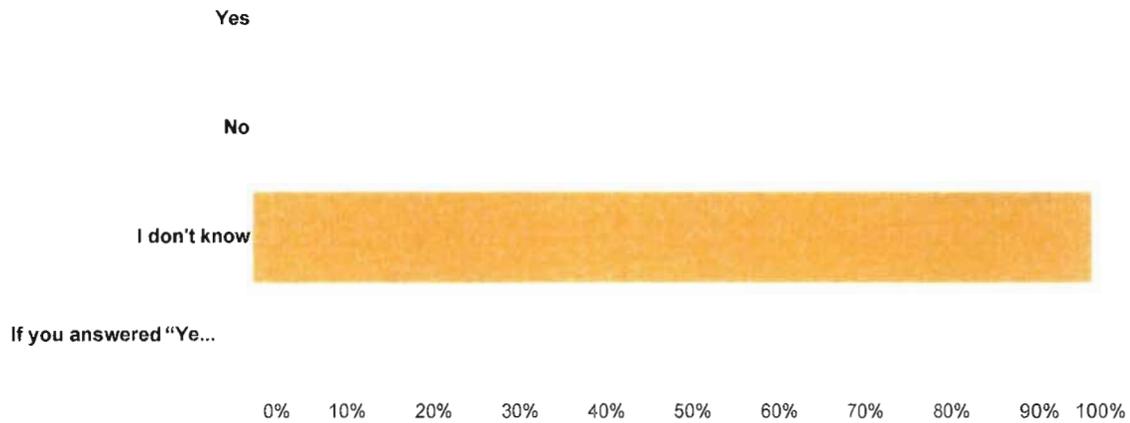
Answered: 1 Skipped: 0



Answer Choices	Response
Yes	0.00%
No	0.00%
I don't know	100.00%
If you answered "Yes" to this question, please discuss the impediments or barriers in the box below. If you can, which Pompano Beach school districts are good and which are poor:	1
	0
Total	1

Q34 Are there any other public administrative actions or regulations in your community that act as barriers to fair housing choice?

Answered: 1 Skipped: 0



If you answered "Ye..."

Answer Choices

Responses

Yes

0.00% 0

No

0.00% 0

I don't know

100.00% 1

If you answered "Yes" to this question, please indicate the administrative action or regulation and discuss how it creates impediments or barriers to fair housing choice:

0.00% 0

Total

1

Q35 Are there specific areas of Pompano Beach that you feel have fair housing problems?

Answered: 1 Skipped: 0

Yes

No

I do not know

If you answered "Ye...

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Answer Choices

Responses

Yes

0.00%

0

No

100.00%

1

I do not know

0.00%

0

If you answered "Yes" please name the geographic area(s)/neighborhood(s):

0.00%

0

Total

1

Q36 The information you share with us will be anonymous. However, if we have questions about any of your responses, we would like to be able to contact you for clarification. While this is completely optional, please provide the following information:

Answered: 0 Skipped: 1

Answer Choices	Responses	
Organization:	0.00%	0
Name:	0.00%	0
E-mail address:	0.00%	0
Phone number:	0.00%	0

