



# MANATEE COUNTY 2017-2021 ASSESSMENT OF FAIR HOUSING

A Joint Effort of Manatee County Government and the Manatee County Housing Authority

**DRAFT FOR PUBLIC COMMENT**  
**October 29, 2016**

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**I. Cover Sheet**

1. Submission date: December 20, 2016
2. Submitter name: Manatee County, Florida
3. Type of submission: Joint Submission
4. Type of program participant(s): Consolidated Plan Participant and PHA:
5. For PHAs, Jurisdiction in which the program participant is located: Manatee County, Florida
6. Submitter members (if applicable): Manatee County Government and Manatee County Housing Authority
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  - g. Zip code: 34205
8. Period covered by this assessment: 2017-2021
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

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

\_\_\_\_\_  
(Signature) (date)

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(Signature) (date)

Departmental acceptance or non-acceptance:

\_\_\_\_\_  
(Signature) (date)

Comments

## 2.0 Executive Summary

The following summarizes the Assessment of Fair Housing (AFH) report, the issues identified, factors that contribute to discrimination, goals for achieving fair housing, and the analysis in support of those goals, including community participation.

### Fair Housing Issues and Contributing Factors

The AFH identifies several fair housing issues and contributing factors in Manatee County, Florida. These issues and contributing factors include:

- A lack of knowledge about Fair Housing laws in the absence of an enforcing authority or disseminating agency;
- The disparity of loan originations among racial and ethnic groups resulting from lower incomes, educational attainment, and financial literacy;
- The presence of racially and ethnically concentrated areas of poverty (R/ECAPs) due to a lack of economic opportunity and/or access to affordable housing;
- The occurrence of substandard housing resulting from deficient code enforcement on rental units; and
- The high level of blight within R/ECAPs due to a lack of reinvestment in those neighborhoods.

### Fair Housing Goals

In response to the AFH, Manatee County and the Manatee County Housing Authority (MCHA) have established the following eight (8) goals for achieving fair housing in Manatee County:

1. Fair Housing Education
2. Enforcement of Fair Housing Laws
3. Financial Literacy and Access to Financing for Minority and Low-Income Populations
4. Access to Opportunity
5. Affordable Housing
6. Code Enforcement on Substandard Rental Units
7. Address Patterns of Poverty and Segregation
8. Reinvestment in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

These goals are designed to address the specific fair housing issues and contributing factors identified through community participation and the analysis of fair housing issues. Each of these goals is reinforced by prioritized metrics and milestones detailed in Section 6.0 of this AFH report. The overall timeframe for achieving these goals is five years (i.e., year 2021, the plan horizon), with some objectives to be met on an annual basis.

### Community Participation Process

To inform the AFH, Manatee County Government in coordination with the Manatee County Housing Authority (MCHA) undertook a community participation campaign to educate residents and collect input on fair housing issues. To this end, the County conducted an online community survey and held five (5) face-to-face meetings with housing stakeholders, including non-profit housing agencies, public housing

and R/ECAP residents, and the Board of County Commissioners. Through this campaign, approximately 20 agencies were involved and over 250 individuals participated.

Fair housing issues raised during face-to-face meetings included housing discrimination based on age, race, or familial status, housing discrimination based on past eviction or arrests that are not covered under the current Fair Housing Act, the need for a “fair housing hotline” or fair housing advocate system to receive and process complaints, concern about unsafe or substandard housing conditions, and landlords that do not comply with fair housing requirements.

Based on the survey results, 85 percent of respondents are aware of fair housing requirements and 61 percent of respondents feel either somewhat informed or well-informed about housing discrimination. A quarter (26 percent) of survey respondents believe housing discrimination is an issue in Manatee County and nearly 30 percent of survey respondents have experienced housing discrimination or know someone that has experienced discrimination. Survey respondents cited race, color, and familial status as the most common basis for discrimination in Manatee County. While few survey respondents have reported incidents of discrimination in the past, nearly a quarter believe that reporting the incident would not make a difference. When asked what they would do if they encountered housing discrimination in the future, 55 percent of respondents said they would report it.

#### Analysis

In addition to the community participation campaign, an analysis of demographics, patterns of segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAPs), disparities in access to opportunity, disproportionate housing needs, disability and access, and fair housing enforcement was conducted. The following provides a summary of the analysis.

#### *Demographics*

The racial/ethnic composition of Manatee County is 76% White, 7% Black or African/American, and 14% Hispanic. Other racial/ethnic groups comprise just 3% of the population. Since 1990, the percentage of minority racial/ethnic groups in Manatee County has increased. For example, the Hispanic population has nearly tripled over the past 20 years, from 4% of the population in 1990 to 14% in 2010. Similarly, the percentage of foreign-born individuals and those with limited English proficiency has also increased.

Approximately 20% of the population is under the age of 18 years, and 24% of the population is over the age of 65 years. Trends indicate that the County’s population is slowly getting younger and the number of families with children has increased since 1990. Today, nearly 34% of Manatee County’s population includes families with children.

#### *Patterns of Segregation and Integration*

In general, Manatee County experiences low to moderate segregation between racial groups. Using the index provided by the Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, racial/ethnic dissimilarity in Manatee County is highest between Black or African American and White populations; however, the degree of dissimilarity has decreased since 1990.

Geographic patterns of segregation and integration have stayed relatively constant since 1990, apart from southeast Bradenton and the unincorporated areas along and generally between U.S. 41 and U.S. 301, in which the Black or African American and Hispanic population has become increasingly concentrated since 1990. These areas correspond with the HUD-designated R/ECAP areas south of Bradenton and overlap with higher percentages of limited English proficiency and foreign-born population. Areas of segregation also overlap with higher percentages of renter-occupied units, except for the Palmetto area, where owner-occupied units are more common.

#### *Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)*

In Manatee County, there are three (3) R/ECAP census tracts. The northern R/ECAP area is located southeast of downtown Bradenton, between 1st St./U.S. 41 and 15th St. E. (south of U.S. 301 and north of 44th Ave. E./Cortez Rd.). The southern R/ECAP area is located south of Bradenton, between 14th St. W. and 15th St. E. (south of 53rd Ave. E. and north of 63rd Ave. E.).

Both R/ECAPs are urban neighborhoods in character and contain a greater concentration of Black and Hispanic population than the surrounding area. The racial/ethnic composition of the population living in Manatee County's R/ECAPs 32% White, 48% Hispanic, and 18% Black or African/American. Uniquely, the southern R/ECAP contains a significant concentration of persons from Mexico and a Spanish-speaking population with limited English proficiency; whereas the northern R/ECAP does not. Over half (52%) of the population in Manatee County's R/ECAPs are families with children.

#### *Disparities in Access to Opportunity*

The AFFH Data and Mapping Tool provides indices for access to opportunity by racial/ethnic group. Considering all opportunity indices for the total population of Manatee County, the Asian or Pacific Islander population has the least access to transit, low transportation cost, and jobs proximity. The Hispanic population has the least access to low poverty, labor market, and environmental health. This indicates a pattern of disparity in access to some but not all opportunities for the Asian or Pacific Islander population and Hispanic population. Comparatively, the Black or African American population has less access to school proficiency than other race/ethnicity groups.

#### *Disproportionate Housing Needs*

Areas where more than 50% of the housing units are renter-occupied include East Bradenton, South Bradenton, West Samoset, and east Palmetto, as well as the County's north R/ECAP area and portions of the south R/ECAP area. The highest concentrations of owner-occupied housing units are located either east of I-75 or toward the barrier islands.

When these areas are compared to the percentage of households with housing burden, areas with higher percentages of renter-occupied units generally have higher percentages of households with housing burden. In general, the distribution of households with housing burden indicates a need for renter-occupied housing rehabilitation or more affordable rental housing options.

Regarding race/ethnicity group and national origin, areas of greater segregation are characterized by a higher percentage of renter-occupied units; however, owner-occupied housing still accounts for at least

half of the housing units in these areas. Given the data on disproportionate housing needs, these areas may require more multi-faceted housing rehabilitation and affordable housing options.

Considering countywide percentages of households by race/ethnicity, no race/ethnicity has a disproportionate need for publicly supported housing when compared to the jurisdiction; however, there is a higher percentage of Black or African American households of low-to-moderate income than Black or African American households of any income.

In unincorporated Manatee County, access to public housing is limited and distant from areas with housing needs. Project-based Section 8 opportunities are also limited in Manatee County, although more proximate to R/ECAP areas. Housing Choice Vouchers (HCVs) do appear to be utilized in areas with corresponding housing needs, particularly in the areas along US 301 northeast of Palmetto and southwest of Bradenton. The areas where HCVs are most utilized correspond to areas of low- and moderate-income and greater racial/ethnic integration.

#### *Disability and Access to Housing*

In terms of location of disability by type, there is no apparent segregation by disability type in Manatee County. Persons with hearing, vision, or cognitive disabilities appear integrated in more developed areas of the County, as do persons with ambulatory, self-care, or independent living disabilities; however, ambulatory disabilities are most widespread. Lowered kitchen counters and appliances, widened doorways, modified bathrooms and showers, or other mobility devices are some of the features unique to accessible housing. Even basic accessibility features (such as an entrance with no steps or homes with no stairs and/or elevators) may be lacking in older housing developments.

#### *Fair Housing Enforcement*

The primary agencies/organizations devoted to fair housing issues are the Manatee County Redevelopment and Economic Opportunity Department and the Florida Commission on Human Relations. Additionally, the Manatee County Housing Authority (MCHA) is a primary resource regarding fair housing options and opportunities within Manatee County.

Several state and local fair housing laws pertain to Manatee County. Like the Federal Fair Housing Act, the state of Florida maintains the Florida Fair Housing Act. Additionally, the local government of Manatee County maintains a Manatee County Fair Housing Ordinance. Although these laws exist, there is no local enforcing authority or process for filing complaints, and it is unclear how information regarding Fair Housing is made available to the public.

### **3.0 Community Participation Process**

This section of the AFH includes a description of the AFH community participation process. Manatee County Government along with the Manatee County Housing Authority (MCHA) undertook a number of activities to broaden and encourage meaningful community participation. Steps that were taken to ensure meaningful community participation are described herein.

#### **3.1 Description of Outreach Activities**

This section provides a description of outreach activities undertaken to encourage broad and meaningful community participation. This includes: (1) identification of media outlets used, including efforts to reach populations underrepresented in the planning process; (2) an explanation of how these efforts are designed to reach the broadest audience possible; and (3) for the MCHA, provides details regarding outreach to the Public Housing Authority (PHA) Resident Advisory Board.

##### Community Survey

A community survey was conducted to gain input from the public on issues pertaining to the topic of fair housing. In total, 212 responses were obtained the online survey monkey format and paper copies of the survey which were available in both English and Spanish. Copies of the survey were mailed to public housing residents, available at MCHA offices, Manatee County Government offices, and online.

##### Public Meetings/Hearings

Several public meetings were held to gather input on fair housing topics and issues in Manatee County. These meetings were advertised consistent with Manatee County's Citizen Participation Plan and held with the following organizations and at the following times:

- Fair Housing Focus Group Meeting with People Assisting the Homeless (PATH) on September 15, 2016 at 9:00 a.m.
- Pine Village Residents' Association (PHA Resident Advisory Board) Meeting on September 15, 2016 at 5:00 p.m.
- Board of County Commissioners (BOCC) Work Session on October 18, 2016 at 9:00 a.m.
- BOCC Public Hearing held on December 13, 2016 at 10:30 a.m.

##### R/ECAP Neighborhood Meetings

A neighborhood meeting was held for Manatee County's three (3) HUD-designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs). Although this meeting was held in the Samoset Community, the meeting location was in the vicinity of all of the County's R/ECAPs. This meeting was advertised consistent with Manatee County's Citizen Participation Plan and held at the following time:

- Samoset Community (R/ECAPs) Meeting on September 19, 2016 at 6:00 p.m.

##### Other Outreach

- Fair Housing Educational Brochures
- Facebook
- Neighborhood Newsletter
- Board of County Commissioner briefings

- Print Media – Advertisements were placed in the Bradenton Herald, 7Dias, and Tempo News
- Notices of hearings and meeting dates as well as links to Assessment of Fair Housing (AFH) were posted on [www.mymanatee.org](http://www.mymanatee.org)
- Draft of AFH Plan issued on October 29, 2016 through December 13, 2016 for a 45-day public comment period and placed on Manatee County Government and MCHA websites.

### 3.2 List of Organizations Consulted

This section of the AFH includes a list of organizations consulted during the community participation process. Below is a listing of organizations that participated in the development of the AFH:

- Bay Pines
- Career Source
- Family Resources
- Health Planning Council of Southwest Florida (HPCSWF)
- HOPE Family Services
- Jewish Family & Children's Service of the Suncoast (JFCS)
- Manatee County Board of County Commissioners
- Manatee County Housing Authority
- Manatee County Neighborhood Services Department
- Manatee Glens
- Manatee Religious Services
- People Assisting the Homeless (PATH)
- Pine Village Resident Association (PHA Resident Advisory Board)
- Samoset Neighborhood Association
- Selah Freedom
- Stillpoint
- Tidewell Hospice
- Turning Points
- United Way

### 3.3 Evaluation of the Community Participation Efforts

Community participation was advertised consistent with Manatee County's Citizen Participation Plan and included a combination of direct mail and email invitation, social media, flyers/handouts, newsletters, newspaper advertisements, and website postings. In total, approximately 46 individuals participated in face-to-face meetings advertised during the AFH community participation process. The level of participation at these meetings was as expected. Excluding meeting facilitators, approximately 25 people attended the Fair Housing Focus Group Meeting with PATH, 11 people attended the PHA Resident Advisory Board Meeting with the Pine Village Residents' Association, and 10 people attended the R/ECAP Meeting in the Samoset Community. Another 212 individuals participated in the community survey, either in paper format or online. The level of participation in the community survey was far greater than expected. Additionally, the BOCC work session and public hearing were advertised and open to the public, including the focused participation of the County's elected and appointed officials.

### 3.4 Summary of All Comments

The following provides a summary of all comments received during the AFH community participation process:

#### Community Survey

The online community survey consisted of 13 multiple choice questions. Additionally, several questions included an open-ended “other” response option. Nearly half of the survey participants responded as White, non-Hispanic. Approximately 35 percent of survey participants responded as Black or African American and 10 percent responded as Hispanic or Latino. The remainder of participants responded as other races or a combination of races. Approximately 95 percent of survey participants were ages 21 to 74 years and the majority of survey participants were female. Approximately half of survey participants responded that their household’s income is less than \$25,000 annually.

When asked if they are aware of the basic fair housing requirements that prohibit discrimination, approximately 85 percent responded “yes” they are aware. When asked if they believe housing discrimination is an issue in Manatee County, 36 percent responded “yes” it is an issue. Most of the reasons given for a positive (yes) response were that respondents have personal experience with discrimination, know people who have experienced discrimination, or have witnessed discrimination. Moreover, other reasons given for a positive (yes) response related to issues of affordability.

When asked if they have ever experienced housing discrimination, 20 percent responded positively with either “yes, I have” or “I think I may have”. Another 7 percent responded “I know someone who has” or “I think I may know someone who has” experienced housing discrimination. Most of the reasons given for a positive (yes) response were related to race or familial status.

When asked about the reasons that they believe or think that someone they know encountered housing discrimination, the most common responses were that housing providers refuse to rent or deal with a person and that housing providers falsely deny that housing is available. Other common responses were that housing providers refuse to make reasonable accommodations for the disabled (percent), real estate agents direct people to certain neighborhoods or refuse to sell or deal with a person, different terms and conditions are provided for renting based on race, and discriminatory advertising.

When asked on what basis they believe they or someone they know were discriminated against, the most common responses were race, color, and familial status. Other responses entered pertained to income and financial status, as well as background, age, and sexual identity. Half of respondents selected “not applicable”.

When asked if they have reported incidents of discrimination, the majority of respondents selected “not applicable”. Only four percent responded positively that “yes” they had reported the incident. Approximately 32 percent responded “no” they had not reported the incident. When asked why they had not reported the incident, 23 percent responded that they “do not believe it makes a difference”. Another six percent responded that they “do not know where to report,” four percent responded that were “afraid of retaliation,” and four percent responded that it was “too much trouble” to report the incident. The majority of respondents selected “not applicable”.

When asked how well-informed they would say they were about housing discrimination, 29 percent responded that they were very informed, 32 percent responded they were somewhat informed, 18 percent responded that they were a little informed, and 20 percent responded that they were not at all informed. Several respondents selected “other” and indicated they only felt informed concerning rentals, or through the newspaper or a housing provider/non-profit.

When asked what they would do if they encountered housing discrimination, over half (55 percent) responded that they would report it. Approximately 17 percent responded that they would not know what to do and eight percent responded that would do nothing and seek other housing options. Approximately nine percent responded that they would tell the person that they believe they are discriminating. Of those that selected “other,” most responded that they would both tell the person and report it. One responded that evidence of discrimination would be difficult to obtain and another responded that they would contact a lawyer. One responded that their age makes reporting too much trouble, another responded that nothing can be done, and another responded that they would report it but did not know where to report it.

#### *Fair Housing Focus Group Meeting with People Assisting the Homeless (PATH)*

The Fair Housing Focus Group Meeting was held with PATH, the continuum of care for Manatee County, that is represented by individuals and agencies that work in law enforcement, mental health and substance abuse, employment services, social services, faith-based organizations, medical services, business, and housing services. Approximately 25 member-agency representatives attended the meeting. The meeting consisted of a fair housing presentation and open discussion about participant agency concerns pertaining to fair housing issues.

Participants identified several areas of concentrated poverty in Manatee County, including greater Palmetto, the Rubonia neighborhood, U.S. 41 and U.S. 301, and east County, where fair housing issues may occur.

Several participants in the meeting raised concerns that their clients have experienced discrimination. For example, one participating agency stated that many of their applicants have experienced age-based discrimination because they are young, not necessarily older; however, there is no immediate option to help them. Examples cited included discrimination against young single mothers with children. The participants discussed the current process to report discrimination and it was noted that the client/tenant must call to make a fair housing complaint and that the agency is not able to call on behalf of client.

Participating agencies suggested that there needs to be a “fair housing hotline” so that complaints can immediately be processed. Participants also suggested that there be a mentor or advocate system to help walk clients/tenants through the fair housing complaint process.

Multiple agencies stated that it is extremely difficult to find housing for people that have previously been arrested or evicted. These agencies are concerned that such clients/tenants are not a protected class and that such discrimination will continue to be a barrier for housing.

Participating agencies also stated that there are not enough affordable rental properties and that, of the available properties, most are in bad shape or have deplorable living conditions. Consequently, participants discussed the County's housing code and the process for reporting code violations and enforcing housing standards. The meeting facilitators suggested that participating agencies contact Code Enforcement when they suspect a code violation.

*Pine Village Residents' Association (PHA Resident Advisory Board)*

The PHA Resident Advisory Board Meeting was held with the residents in attendance at the monthly Pine Village Residents' Association Meeting. Pine Village is a public housing subdivision in Manatee County. Seven residents, four staff from Housing Authority, and two staff from Manatee County attended the meeting. The meeting consisted of a fair housing presentation and open discussion about PHA resident concerns pertaining to fair housing issues.

The majority of public housing residents reported that they were pleased with the Housing Authority and did not feel discriminated against there. Residents also commented that the condition of the rental units and surrounding property were well-maintained and there were no complaints.

One resident commented that she was previously discriminated against because she was black, but that she felt she could not complain because she was afraid that she would not be able to get another unit in the future. Another resident commented that she, too, had felt she was discriminated against and that she contacted everyone she could, including the police, but did not get results. Other instances of previous discrimination included landlords advertising availability and then revoking availability upon meeting with the applicant or landlords charging "by the head" rather than by the unit. Some residents felt they were not informed of their rights with regard to fair housing.

The residents discussed the quality of the housing they had previously rented, and commented that it was not well-maintained. Four of the residents commented about the conditions of their prior housing situation and that the landlords refused to repair or fix broken items in the unit. It was felt that the landlords would rather kick them out and rent to someone else, than fix the problems. There is a need for better code enforcement. Some residents commented that there is a lack of affordable housing in Manatee County, and of the affordable housing, most units are unsafe or substandard.

*Samoset Community (R/ECAP) Meeting*

The R/ECAP Meeting was held in the Samoset Community to provide a forum on fair housing issues. Approximately 10 residents attended the meeting. The meeting consisted of an open discussion about community concerns, including fair housing issues.

During the meeting, residents voiced their concerns about the current condition of the community. Several community residents conveyed that they feel housing is "run-down" and that the government has "forgotten" them in lieu of other neighborhoods such as West Bradenton and East Bradenton. There was also a comment about the need for street lighting to deter crime and keep the neighborhood safe. One resident commented that drug activity was more prevalent in the past, but recently declined. Another resident commented that there is a flooding problem since the Beall Distribution Center was

constructed and that there is an issue with storm drains. Residents expressed the need for transportation to medical appointments, as well as sidewalks, stormwater maintenance (e.g. cleaning of drainage ditches), and a playground for children.

With regard to housing, there is a perception that the neighborhood had an older owner population but that rentals have taken over. Residents commented that housing should be held to a higher standard and that the County needs to enforce the housing standards and building code. Overall, the residents in attendance stated they chose to live in the area because their families have been there for many years, that homes are affordable, and they feel safe in the community.

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## 4.0 Assessment of Past Goals and Actions

This section of the AFH includes an assessment of the County and MCHA's past fair housing goals and actions. This look back provision is required to assess progress made towards those fair housing goals previously set. First, the identification of what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents. Following is an evaluation of past fair housing goals/actions includes:

1. A discussion of what progress has been made in their achievement
2. A discussion of how past goals have influenced the selection of current goals
3. A discussion of additional policies, actions, or steps that address fair housing issues

### 4.1 Progress Made Toward Achievement of Past Goals

#### Analysis of Impediments to Fair Housing Choice (2010)

Seven barriers to fair and affordable housing were identified in the Analysis of Impediments to Fair Housing Choice Report, prepared by J-Quad and Associates in 2005 and updated in 2010 by Manatee County's Neighborhood Services Department. This report also identified corrective actions to overcome these barriers.

During 2010, Manatee County and the City of Bradenton held four joint focus groups to solicit input on impediments to fair housing. Subsequently, the County and City decided to provide individual analyses for their respective jurisdictions.

Manatee County staff continues to work on developing strategies to address the identified impediments. Efforts to eliminate and/or reduce the impediments will be taken during the next year.

It is important to note that Manatee County's capacity to engage in corrective actions is based almost entirely on funds obtained from federal and state government. At the federal level, these funds come through CDBG and HOME. At the state level, resources have been provided in the past by the State Housing Initiatives Partnership (SHIP) Program funded through the State Housing Trust Fund; however, in recent years, these funds have been severely constrained due to the economic downturn.

Barriers to fair and affordable housing were identified in the Analysis of Impediments to Fair Housing Choice Report as follows.

#### **Impediment 1: Development Costs for Housing**

***Corrective Actions:*** *Manatee County should continue to support local affordable housing providers. The County should continue to support the Manatee County Affordable Housing Advisory Committee and Rapid Response Program to address the concerns and needs of developers.*

*The County should market various programs and services that can assist developers in the production of affordable housing units. The County has already initiated the Reduced Impact Fees schedule for affordable housing. In addition, Manatee County has developed an Impact Fee Credit Program. This program allows a developer/builder to apply for impact fee reimbursement upon the sale of an*

*affordable housing unit to a low/mod income eligible, first-time homebuyer. Manatee County has begun land subsidies through the conveyance of County property to non-profit developers and should continue to explore the elimination of permitting fees. Tax abatements should also be explored as additional incentives for developers.*

**Achievements**

- The Manatee County Affordable Housing Advisory Committee continues to make recommendations on regulatory barriers, incentives, and other additional methods to create and maintain affordable housing in Manatee County.
- The County adopted Ordinance 05-30 on May 3, 2005, which authorizes the conveyance of County owned property to nonprofit housing organizations to develop affordable housing as available.
- The County continues to support an Impact Fee Program for Affordable Housing that utilizes SHIP and General Revenue funds. The County used \$58,008.66 of impact fees in the 2014-15 PY to pay developers of affordable housing.
- The County continues to support a program that allows for refunds on permit and application fees to developers of affordable housing. During PY 2014-15, permit fees of \$8,849.00 were paid to developers of affordable housing.
- Two residential properties were acquired by Manatee County, to be conveyed to a non-profit agency and be utilized as affordable housing.

**Impediment 2: Inadequate Financial Literacy Education**

***Corrective Actions:** Manatee County should address the importance of financial literacy in the public-school system. The County should support an agency that can design a class that educates students on proactive financial planning, credit management, and debt-to-income ratio. The goal should be to provide education to students before they enter adulthood and make careless credit decisions.*

*The County should work with housing advocates to continue homeownership counseling and down payment assistance for residents that addresses topics on credit worthiness, financing, and homeowner responsibilities. The emphasis should be to encourage residents to transition from renters to homeowners.*

*The County should continue to encourage lending institutions to do more to market alternative methods for qualifying residents for mortgages. Many lending institutions have qualifying programs that accept utility bills, car payments, and occupational longevity to establish credit and offer subprime mortgages for those with “less than perfect credit”. The County has added Spanish literature over the past few years and has a translator present at public meetings to communicate more effectively with the Hispanic population. The County’s website should be utilized more for financial literacy education and the County should start advertising those opportunities for the Hispanic community through a local Hispanic newspaper.*

**Achievements**

- No activities addressing this impediment occurred during the program year.

- 10/1/2015 - will pursue in subsequent years as budget allows.

**Impediment 3: Disparity of Loan Originations Among Racial Groups**

**Corrective Actions:** *The County should work with lending institutions to target ways to lessen the disparity among minority loan applicants. Part of the recommended strategy should be to share Home Mortgage Disclosure Act (HMDA) data with lending institutions to determine where minorities fall short in their qualifications and help them remedy their issues. Lending institutions should continue to work on overcoming communication barriers with the Hispanic population.*

**Achievements**

- No activities addressing this impediment occurred during the program year.
- 10/1/2015 - will pursue in subsequent years as budget and staffing allows.

**Impediment 4: Lack of Local Enforcement of Fair Housing Law**

**Corrective Actions:** *The County should continue to seek ways to coordinate fair housing activities, outreach, and enforcement for residents in Manatee County.*

*Restructuring of County government since 2005 has resulted in the coordination of services, which eliminated duplication of efforts, confusion of reporting, and stretched the County budget for additional fair housing activity. The County continues to look for ways to streamline its processes and save money.*

*The County should continue to conduct outreach programs to educate the public on fair housing practices. These programs should target fair housing violations, education, and enforcement issues. Programs will continue to be scheduled on a regular basis and target all racial and income groups.*

*The County should consider seeking designation of a Fair Housing Assistance Program (FHAP) as a means of providing additional enforcement in fair housing for the region, once economic conditions improve.*

**Achievements**

- Manatee County adopted a new Fair Housing Ordinance on 9/25/12 establishing County staff responsibilities for education, outreach, and complaint issues.
- During the 2012-13 program year, Manatee and Sarasota County staff met for a preliminary discussion on the formation of a joint Fair Housing Assistance Program (FHAP).

**Impediment 5: Predatory Lending**

**Corrective Actions:** *The County should continue to encourage lending institutions to locate in low-income census tracts. The emphasis should be to establish or reestablish checking, saving, and credit accounts for residents that commonly utilize check cashing services. Lending institutions should be encouraged to tailor products to meet past financial deficiencies of residents. The County has taken steps to ensure that potential homebuyers that are obtaining County financial assistance receive fixed rate loan products with the lowest interest rate possible, based upon the borrower's qualifications, at the time of closing. In*

*addition, the County has put policy into place allowing the refinance with subordination of SHIP or HOME liens to a fixed rate product with no “cash out” at closing.*

**Achievements**

- No activities addressing this impediment occurred during the program year.
- 10/1/2015 - will pursue in subsequent years as budget and staffing allows.

**Impediment 6: Limited Income**

***Corrective Actions:*** *The County should continue to support activities sponsored by the local Chamber of Commerce and the Economic Development Corporation to recruit more corporations and manufacturing firms to the area. These organizations recruit firms that typically pay higher wages than service industry jobs and offer additional training and educational opportunities for residents.*

*The County should continue to encourage expansion of existing businesses and local area employers to provide Employee Assisted Housing through down payment assistance, compensatory day with pay for closing activities, low interest rate loans, and homeownership education classes.*

*The County should continue to support agencies that provide workforce development programs and continuing education courses to increase the educational level of residents. The goal should be to increase the GED, high school graduation, technical training, and college matriculation rates among residents.*

*Since 2009, the County’s Economic Development Division’s (EDD) efforts have brought new companies to Manatee County and substantially increased the number of higher paying employment opportunities available within the community. The EDD continues to work with the business community to relocate new industry/companies to Manatee County.*

**Achievements**

- The County provides financial support to the Manatee County Chamber of Commerce and its Economic Development Council from the County general fund.
- With CDBG program funding, the County supported the Central Economic Development Center for promoting and supporting micro enterprises and entrepreneurs in Manatee County. This will aid in the development and growth of small businesses and provide employment opportunities within LMI neighborhoods.
- The Economic Development Division continues to relocate new industry/companies to Manatee County, creating new higher paying jobs.
- In FY 14/15 the Bradenton Area Economic Development Corporation (BAEDC) focused on existing industry in Manatee County, as 90% of new jobs created come from this sector. In addition, the BAEDC continued marketing and outreach to international prospects building on local resources such as Port Manatee, Sarasota-Bradenton International Airport, existing global companies, business friendly environment, and quality of life.
- The BAEDC’s efforts resulted in 3 announced company expansions and/or relocations resulting in 290 jobs projected to be created over the next 5 – 7 years.

- Manatee County provided staff and financial support to the BAEDC workforce liaison, CareerSource Suncoast, Career Edge, and Central Economic Development Corporation to provide workforce development programs.
- County staff supported economic development with contract management for 68 EDI grants; rapid response permitting for 59 companies, project scoping and assistance with information for 71 companies during FY 14/15.

**Impediment 7: New Financing Requirements**

***Corrective Actions:*** *Fear and excessive losses in the banking industry have caused lending institutions to go from very relaxed and perhaps irresponsible lending practices to extremely conservative, traditional underwriting. High risk loan products have been eliminated. Lending institutions need to stop overreacting to a crisis that they were partially responsible for creating, and go back to a more “middle of the road” type of loan approval process.*

*Progress in addressing the identified barriers to fair housing choice will be monitored by the Neighborhood Services Department and, in cooperation with the Equal Opportunity Administrator and Americans with Disabilities Act (ADA) Liaison, will make annual reports to the Manatee County Affordable Housing Advisory Committee (AHAC) and the Board of County Commissioners regarding the status of fair housing in Manatee County.*

**Achievements**

- No activities addressing this impediment occurred during the program year.
- 10/1/2015 - will pursue in subsequent years as staffing allows

**Manatee County Housing Authority 2012-2017 Five-Year Plan**

Manatee County Housing Authority has provided the following Fair Housing Activities to further Fair Housing for clients, during the 2012-2017 Five-Year Plan:

- Public Housing Residents on admission receive the publication Fair Housing it is your Right.
- The Family Self Sufficiency and Resident Opportunities for Self Sufficiency coordinators provide monthly Fair Housing articles in the resident newsletter. This is documented in the grant reporting model for HUD as a Family Self-sufficiency program goal.
- The Public Housing Office displays Fair Housing posters and information at various locations and meeting rooms. When the Public Housing Office receives a telephone call it is received from any person requesting Fair Housing assistance the Atlanta complaint center telephone number is provided and available.
- The MCHA office receives many walk-in clients looking for rental assistance and affordable rentals so the information is available to the public.
- Housing Choice Voucher program participants received a fair housing flyer along with a current income census tract map during the orientation appointment. The flyer explains the fair housing rights provided by HUD and the income census tract gives the participant the areas of high concentration of poverty in a given area within Manatee County to encourage locating available rental units outside of the concentration of poverty. The Housing Choice Voucher

program displays fair housing information within the lobby including the telephone number for fair housing complaints. The Housing Choice voucher program office is open to the public, clients and Landlords that participate in our program. All visitors to our office lobby have access to the information on display within the office lobby. The Housing Choice Voucher office also receives telephone calls requesting assistance with Fair Housing and provides the Atlanta office telephone number for additional assistance.

## 4.2 Success/Shortfalls of Achieving Goals

Manatee County and the Manatee County Housing Authority have successfully implemented ongoing consultation, education and workshops for the community. Affirmatively furthering fair housing continues to be a priority and recent community surveys and outreach have shown a concern for several items which are fair housing issues. Past goals and issues are starting points for current and future goals and strategies.

### Manatee County

#### *Successes:*

- Through the Homebuyer Education, potential homeowners were educated on their rights to Fair Housing
- Established the Affordable Housing Advisory Committee to assess barriers to affordable housing within Manatee County's Land Development Code and Comprehensive Plan Housing Element
- Established and implemented the housing incentives to encourage affordable housing developments and impact fee refunds for development of affordable single family housing.
- Through utilization of the State Housing Initiative Partnership program, Manatee County has assisted low income households in realizing homeownership
- With CDBG program funding, the County supported the Central Economic Development Center for promoting and supporting micro enterprises and entrepreneurs in Manatee County.
- The County has taken steps to ensure that potential homebuyers that are obtaining County financial assistance receive fixed rate loan products with the lowest interest rate possible, based upon the borrower's qualifications, at the time of closing. In addition, the County has put policy into place allowing the refinance with subordination of a SHIP or HOME lien to a fixed rate product with no "cash out" at closing.

#### *Shortfalls:*

- Due to lack of organizations to provide Financial Literacy education, Manatee County was not able to initiate this activity.
- Due to reduction of staff during the recession, outreach to lending institutions was limited, however, staff has now begun initiating building relationships with local lenders within CDBG blighted communities and in the implementation of its Down-Payment Assistance program.
- Manatee County pursued preliminary discussion in the establishment of a Fair Housing Assistance Program, however, due to loss of staff during the recession, was not able to move forward.

Manatee County Housing Authority (MCHA)*Successes:*

- Providing housing assistance through HUD funding to all protected classes based on income and eligibility.
- Providing education of Fair Housing Laws through Resident interaction.
- Providing increased earned income through Self Sufficiency programs.
- Providing Housing Choice by use of vouchers and encouraging selection of housing outside of concentrated poverty areas.
- Encouraging home ownership and graduation from assisted housing.

*Shortfalls:*

- Diverse landlord participation in areas of low poverty that will accept HCV Vouchers.
- Increase the affordable rental unit inventory to assist more families.
- Limited funding from HUD to assist more families within the HCV program.
- Local Fair Housing office for enforcement of violations and discrimination complaints.

Additionally, the County and MCHA have conducted surveys, questionnaires and community meetings to develop a dialogue to identify current concerns and plan strategies to be implemented in planning documents. The MCHA successfully administers affordable housing units within the Manatee County region. Affordable units are limited to funding, and there is a limit on the number of quality units that are available at market rates.

#### **4.3 Policies, Actions or Steps That Could Be Taken to Achieve Past Goals**

Several steps could be taken to achieve past goals. Through outreach, data collection, and analysis, the following potential policies, actions and steps were identified:

- The adoption of a local fair housing ordinance that is substantially equivalent to the Fair Housing Act of 1968 would be a significant step in providing for local fair housing enforcement.
- More stringent enforcement and inspection of rental units
- Develop a more defined procedure and policy for the receipt of fair housing complaints

#### **4.4 Influence of Past Goals on Selection of Current Goals**

Past goals heavily influenced the development of current goals. Manatee County and MCHA work hard to reach established goals. A major problem with past goals is that goals are not always within the capability of the responsible participants. As goals become too difficult, performance suffers and thus the goals are perceived to be unreasonable and unattainable.

In the development of new goals, the County and MCHA focused on creating goals that are achievable, attainable, and within the power of the respective agencies to complete.

That said, given that past goals were set within the past five years, some goals still apply in 2016. When evaluating past goals, it has become apparent that some existing goals are still applicable today. Some fair housing issues that existed over the past five years are still prevalent today. That said, the County and MCHA have chosen to keep these goals with minor modifications to accommodate the new AFH format.

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## 5.0 Analysis of Fair Housing Issues

This section contains an assessment of key fair housing issues. These topics will enable program participants to identify and discuss fair housing issues arising from the combined analysis of HUD-provided data, local data, and local knowledge. The Code of Federal Regulations defines a fair housing issue as “a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.” Some of the most common fair housing issues as identified by HUD include:

- Integration and segregation patterns based on race, color, religion, sex, familial status, national origin, and disability within the jurisdiction and region;
- Racially or ethnically concentrated areas of poverty (R/ECAPs) within the jurisdiction and region;
- Significant disparities in access to opportunity for any protected class within the jurisdiction and region; and
- Disproportionate housing needs for any protected class within the jurisdiction and region.

By identifying these issues, program participants will determine the significant contributing factors and related fair housing issues facing the jurisdiction and the region.

### 5.1 Demographic Summary

#### 5.1.1 *Demographic Patterns & Trends Over Time*

The racial/ethnic composition of Manatee County and the North Port-Sarasota-Bradenton region is predominately White. According to HUD documentation, 76% of Manatee County’s total population is White and 80% of the region’s population is White (See **Table 1**). In Manatee County, the remaining racial/ethnic groups are measured as 7% Black; 14% Hispanic; 2% Asian or Pacific Islander; less than 1% Native American; and less than 1% Other.

The greater region of North Port-Sarasota-Bradenton has a smaller minority population than Manatee County with 19% minority compared to the County’s 23%. The minority population of the North Port-Sarasota-Bradenton region is composed of 6% Black; 11% Hispanic, 2% Asian or Pacific Islander; less than 1% Native American; and less than 1% Other.

In Manatee County, the most common countries of National Origin, outside of the United States of America, are Mexico (3.34%), Canada (1.29%), Cuba (0.73%), Haiti (0.68%), and Germany (0.65%). This varies only slightly to the greater North Port-Sarasota-Bradenton region where the most common countries of National Origin are Mexico (2.44%), Canada (1.11%), Cuba (0.80%), Germany (0.65%) and Haiti (0.42%), with a higher percentage of Germans than Haitians.

An individual who does not speak English as their primary language can be limited English proficient, or “LEP”. The native language of those individuals is often referred to as a LEP Language. In Manatee County, the most common LEP Languages are Spanish (5.15%), French Creole (0.29%), French (0.24%), Vietnamese (0.19%), and Chinese (0.16%). In the North Port-Sarasota-Bradenton region, the most common LEP Languages are Spanish (3.98%), Vietnamese (0.19%), French Creole (0.18%), French (0.18%), and Polish (0.17%). Further information regarding the 10 most common countries of origin and the 10 most common LEP languages can be found in **Table 1**.

Ambulatory difficulty is the most common disability type in Manatee County and the North Port-Sarasota-Bradenton region, representing 7% and 8% of the population, respectively. In Manatee County this is followed by hearing difficulty (5%), independent living difficulty (5%), cognitive difficulty (5%), self-care difficulty (2%), and vision difficulty (2%). A similar distribution of disability types is found in the North Port-Sarasota-Bradenton region. Following ambulatory difficulty, the most common disabilities are hearing difficulty (5%), independent living difficulty (5%), cognitive difficulty (5%), self-care difficulty (3%), and vision difficulty (2%). **Table 1** depicts the number of individuals affected by each disability type.

**Table 1** also illustrates the population composition by sex, age, and family type for Manatee County and the North Port-Sarasota-Bradenton region. In Manatee County, 49% of the population is male and 52% of the population is female. The North Port-Sarasota-Bradenton region reflects a similar distribution, where 48% of the population is male and 52% of the population is female. In Manatee County, 20% of the population is under the age of 18, and 24% of the population is over the age of 65. The North Port-Sarasota-Bradenton region reflects similar numbers with 18% of the population younger than age 18 and 28% older than age 65. Nearly 34% of Manatee County’s population includes families with children, compared to 31% of the North Port-Sarasota-Bradenton region.

**Table 1: Demographics**

	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction		(North Port-Sarasota-Bradenton, FL CBSA) Region	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	197,249	75.99%	558,928	79.59%
Black, Non-Hispanic	17,955	6.92%	44,264	6.30%
Hispanic	35,511	13.68%	77,988	11.10%
Asian or Pacific Islander, Non-Hispanic	4,747	1.83%	10,291	1.47%
Native American, Non-Hispanic	491	0.19%	1,275	0.18%
Other, Non-Hispanic	401	0.15%	1,066	0.15%
National Origin	Country		Country	
#1 country of origin	Mexico	7,820 3.34%	Mexico	17,108 2.44%
#2 country of origin	Canada	3,018 1.29%	Canada	7,788 1.11%
#3 country of origin	Cuba	1,719 0.73%	Cuba	5,618 0.80%
#4 country of origin	Haiti	1,595 0.68%	Germany	4,546 0.65%
#5 country of origin	Germany	1,516 0.65%	Haiti	2,954 0.42%
#6 country of origin	Colombia	1,197 0.51%	England	2,517 0.36%
#7 country of origin	England	833 0.36%	Colombia	2,446 0.35%
#8 country of origin	India	812 0.35%	Other UK	2,281 0.32%
#9 country of origin	Guatemala	784 0.33%	Poland	2,222 0.32%
#10 country of origin	El Salvador	769 0.33%	Jamaica	1,960 0.28%
Limited English Proficiency (LEP) Language	Language		Language	
#1 LEP Language	Spanish	11,579 5.15%	Spanish	27,940 3.98%
#2 LEP Language	French Creole	646 0.29%	Vietnamese	1,360 0.19%
#3 LEP Language	French	531 0.24%	French Creole	1,266 0.18%
#4 LEP Language	Vietnamese	422 0.19%	French	1,237 0.18%
#5 LEP Language	Chinese	363 0.16%	Polish	1,180 0.17%
#6 LEP Language	German	272 0.12%	Russian	1,013 0.14%
#7 LEP Language	Hungarian	249 0.11%	Chinese	913 0.13%
#8 LEP Language	Gujarati	208 0.09%	German	875 0.12%
#9 LEP Language	Italian	186 0.08%	Other Slavic Language	814 0.12%
#10 LEP Language	Portuguese	116 0.05%	Hungarian	670 0.10%
Disability Type				
Hearing difficulty	12,506	5.00%	36,449	5.42%
Vision difficulty	5,609	2.24%	15,366	2.28%
Cognitive difficulty	11,596	4.64%	31,992	4.75%
Ambulatory difficulty	18,519	7.40%	55,125	8.19%
Self-care difficulty	6,075	2.43%	17,544	2.61%
Independent living difficulty	11,660	4.66%	34,282	5.09%
Sex				
Male	125,898	48.50%	337,156	48.01%
Female	133,690	51.50%	365,125	51.99%
Age				
Under 18	51,941	20.01%	126,018	17.94%
18-64	145,130	55.91%	382,927	54.53%
65+	62,517	24.08%	193,336	27.53%
Family Type				
Families with children	24,417	33.58%	60,731	31.13%
Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.				
Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.				
Note 3: Data Sources: Decennial Census; ACS				
Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).				

Manatee County and the greater North Port-Sarasota-Bradenton region have both experienced demographic changes in their population over last 20 years. The percentage of White population decreased in both jurisdictions. In 1990 in Manatee County, 90% of the population was White, whereas in 2010 this group represented 76%. This decrease was less dramatic in the North Port-Sarasota-Bradenton region, where 90% of the population was White in 1990 and 80% was White in 2010.

**Table 2** shows that all minority groups experienced some growth over the same 20-year period. The Hispanic population experienced the most growth in both Manatee County and the North Port-Sarasota-Bradenton region. In Manatee County the Hispanic population accounted for just 4% of the population in 1990, but by 2010 it accounted for 14% of the population. Similarly, in the North Port-Sarasota-Bradenton region, the Hispanic population represented just 3% of the total population in 1990. Over the next 20 years the percentage of Hispanic population grew to 11%.

The percentages of foreign-born individuals and those with limited English proficiency have also increased in Manatee County and the North Port-Sarasota-Bradenton region. In 1990, just 5% of Manatee County's population was foreign-born, but by 2010 the percentage increased to 13%. The North Port-Sarasota-Bradenton region experienced a similar shift in the foreign-born population; in 1990, 6% of its population was foreign-born and, in 2010, 13% of its population was foreign-born. The proportion of foreign-born individuals has a close link to those with limited English proficiency. In Manatee County, approximately 3% of the population had limited English proficiency in 1990. This increased to 5% in 2000 and 7% in 2010. In the North Port-Sarasota-Bradenton region, approximately 3% of the population had limited English proficiency in 1990, 5% in 2000, and 6% in 2010.

The age profiles of the population in Manatee County and North Port-Sarasota-Bradenton are similar. The percentage of the population under age 18 in Manatee County was 19% in 1990 and 20% in 2010. From 1990 to 2010, the North Port-Sarasota-Bradenton region experienced a similar 1% increase in the population under age 18, from 17% to 18%. **Table 2** displays a general decrease in the population over age 65. In Manatee County the percentage of the population over age 65 was 29% in 1990, but decreased to 24% in 2010. Approximately 30% of the North Port-Sarasota-Bradenton region's population was over age 65 in 1990, but decreased to 28% by 2010. A younger population in the region is supported by the trend that the proportion of families with children is increasing. In Manatee County there were 13,622 families with children in 1990, or 29% of total families. This increased to 24,417 families in 2010, or 34% of total families. There were 41,486 families with children in the North Port-Sarasota-Bradenton region in 1990, or 28% of total families, but in 2010 this number increased to 60,731, or 31%.

**Table 2: Demographic Trends**

Race/Ethnicity	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction						(North Port-Sarasota-Bradenton, FL CBSA) Region					
	1990		2000		2010		1990		2000		2010	
	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	140,611	90.33%	168,423	83.79%	197,249	75.99%	442,573	90.40%	505,215	85.63%	558,928	79.59%
Black, Non-Hispanic	7,948	5.11%	12,799	6.37%	17,955	6.92%	27,744	5.67%	36,140	6.13%	44,264	6.30%
Hispanic	5,687	3.65%	16,040	7.98%	35,511	13.68%	15,223	3.11%	38,631	6.55%	77,988	11.10%
Asian or Pacific Islander, Non-Hispanic	872	0.56%	2,362	1.18%	4,747	1.83%	2,503	0.51%	6,075	1.03%	10,291	1.47%
Native American, Non-Hispanic	311	0.20%	845	0.42%	491	0.19%	823	0.17%	2,496	0.42%	1,275	0.18%
<b>National Origin</b>												
Foreign-born	8,040	5.17%	16,941	8.43%	34,070	13.07%	28,036	5.73%	52,650	8.92%	87,896	12.52%
<b>LEP</b>												
Limited English Proficiency	3,971	2.55%	9,250	4.60%	17,036	6.54%	12,738	2.60%	26,651	4.52%	40,924	5.83%
<b>Sex</b>												
Male	73,820	47.43%	97,070	48.30%	125,898	48.50%	230,075	47.00%	281,566	47.73%	337,156	48.01%
Female	81,819	52.57%	103,885	51.70%	133,690	51.50%	259,406	53.00%	308,391	52.27%	365,125	51.99%
<b>Age</b>												
Under 18	28,786	18.50%	40,442	20.12%	51,941	20.01%	84,516	17.27%	110,180	18.68%	126,018	17.94%
18-64	81,426	52.32%	108,103	53.79%	145,130	55.91%	256,122	52.33%	311,539	52.81%	382,927	54.53%
65+	45,427	29.19%	52,410	26.08%	62,517	24.08%	148,843	30.41%	168,238	28.52%	193,336	27.53%
<b>Family Type</b>												
Families with children	13,622	28.90%	13,514	32.86%	24,417	33.58%	41,486	28.23%	40,167	32.06%	60,731	31.13%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.  
 Note 2: Data Sources: Decennial Census; ACS  
 Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

**5.1.2 Housing Tenure Location & Trends Over Time**

According to data accessed from HUD CPD Maps, the majority of the County’s housing units are owner-occupied; however, renter-occupied units predominate in certain areas of the County. Areas where more than 50% of the housing units are renter-occupied include Bradenton’s eastern downtown (east of 14<sup>th</sup> St. W. and north of 20<sup>th</sup> Ave. E.), as well as the areas of West Samoset (east of DeSoto Square Mall) and South Bradenton (south of 50<sup>th</sup> Ave. W., east of 31<sup>st</sup> St. W., west of 14<sup>th</sup> St. W., and north of 57<sup>th</sup> Ave. W.). Additional areas of predominately renter-occupied units include the area west of Bennett Park; the area between 15<sup>th</sup> St. E. and 9<sup>th</sup> St. E. (south of 53<sup>rd</sup> Ave. E. and north of 63<sup>rd</sup> Ave. E.); and the area just north of the Manatee County Golf Course on Cortez Rd. The location of homeowners and renters has remained relatively constant since 1990.

**5.2 General Issues**

**5.2.1 Segregation/Integration**

Segregation Levels

It is important that individuals be able to choose where they prefer to live without regard to race, color, religion, national origin, sex, familial status or disability. An analysis of segregation and integration serves to ensure that communities provide open and fair access to residential neighborhoods. While individuals are free to choose where they prefer to live, the Fair Housing Act prohibits policies and actions by entities and individuals that deny choice or access to housing or opportunity through the segregation of protected classes.

A dissimilarity index is used to measure the degree to which two groups are evenly distributed across a geographic area. It is a tool used to assess residential segregation between two groups. The dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of

segregation among the two groups measured. The table below, **Table 3(A)**, demonstrates the general relationship between dissimilarity index values and the level of segregation.

**Table 3(A): Dissimilarity Index**

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-39	Low Segregation
	40-54	Moderate Segregation
	55-100	High Segregation

However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute number, the dissimilarity index may be high even if the group’s members are evenly distributed throughout the area. The index measures only two groups at a time, and therefore it is less reliable as a measure of segregation in areas with multiple racial or ethnic groups.

Segregation Levels and Trends over Time (Since 1990)

In general, Manatee County experiences low to moderate segregation between different racial groups. The Black/White dissimilarity index is the highest with a value of 52.40. However, it is important to note that the Black/White dissimilarity index shows a decrease since 1990 when the value was at 73.57. While there is still room for improvement, **Table 3(B)** shows the dissimilarity index value for all racial group comparisons declined between 1990 and 2010, with the exception of Asian or Pacific Islander/White. The Asian or Pacific Islander/White dissimilarity index shows a slight increase over the past 20 years, with a value of 29.01 in 1990 and a value of 31.23 in 2010.

The North Port-Sarasota-Bradenton region has similar values of dissimilarity to Manatee County, but likely struggles with more instances of segregation between Black/White racial groups. In 2010 the highest dissimilarity index value was between Black and White populations at 58.83. This value has slightly decreased from 1990 when it was recorded at 74.67. In 2010 the remaining dissimilarity index values suggested low to moderate segregation. Since 1990, segregation has decreased between Black and White and between Non-White and White populations, but increased between Hispanic and White and Asian or Pacific Islander and White populations. In 1990 the Hispanic/White dissimilarity index was 41.34 and in 2010 it increased to 44.25. Similarly, in 1990 the Asian or Pacific Islander/White dissimilarity index was 24.72 and in 2010 it increased to 28.94.

**Table 3(B): Racial/Ethnic Dissimilarity Trends**

Racial/Ethnic Dissimilarity Index	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction			(North Port-Sarasota-Bradenton, FL CBSA) Region		
	1990	2000	2010	1990	2000	2010
Non-White/White	58.48	49.00	43.10	57.33	50.14	44.50
Black/White	73.57	63.28	52.40	74.67	65.91	58.83
Hispanic/White	46.72	47.95	45.11	41.34	47.35	44.25
Asian or Pacific Islander/White	29.01	24.45	31.23	24.72	23.00	28.94

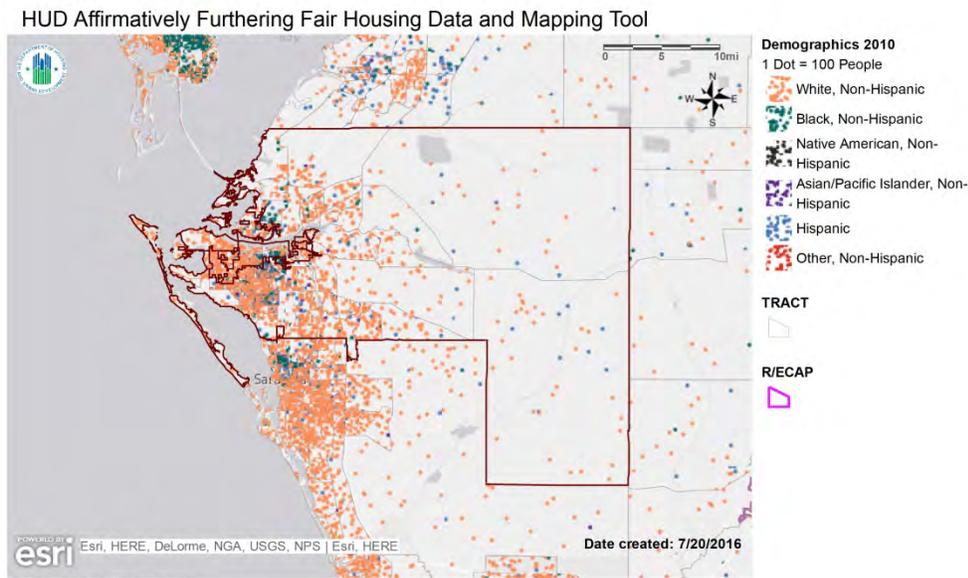
Note 1: Data Sources: Decennial Census  
 Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Areas with Relatively High Segregation/Integration

**Figures 1-3** show areas of segregation and integration by race/ethnicity, national origin, or LEP group, and indicates the predominant groups living in Manatee County.

Race/ethnicity segregation and integration patterns are evident in **Figure 1**. The County’s White population is distributed throughout Manatee County; however, other race/ethnicity groups are more concentrated in Bradenton’s downtown and the areas along and generally between U.S. 41 and U.S. 301. The County’s Black population has a greater presence in Palmetto and downtown Bradenton and the County’s Hispanic population is more represented southeast of Bradenton. In general, the population of other less represented race/ethnicity groups (i.e., Native American, Asian or Pacific Islander, and Other) is distributed throughout Manatee County.

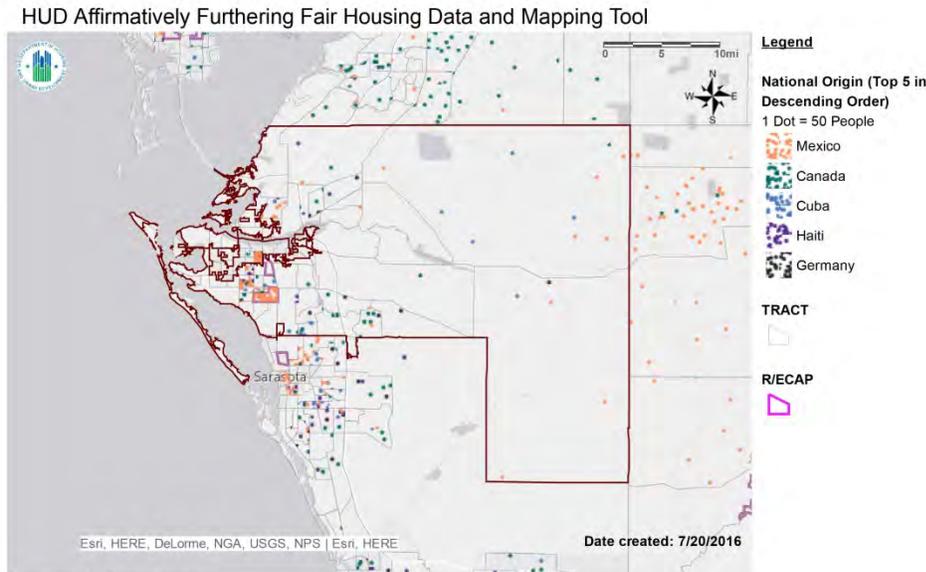
**Figure 1: Segregation/Integration by Race/Ethnicity (2010)**



**Name:** Map 1 - Race/Ethnicity  
**Description:** Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs  
**Jurisdiction:** Manatee County (CDBG, HOME, ESG)  
**Region:** North Port-Sarasota-Bradenton, FL

National Origin segregation patterns are evident in **Figure 2** from the high concentration of individuals from Mexico in southeast Bradenton and within the County’s southernmost R/ECAP area, as well as Palmetto. Individuals from Canada are distributed throughout the urban County but are most concentrated in the southern County between SR 70 and University Parkway near I-75. In general, more integrated areas of National Origin generally include southeast Bradenton, Palmetto, and the area between SR 70 and University Parkway near I-75.

**Figure 2: Segregation/Integration by National Origin**

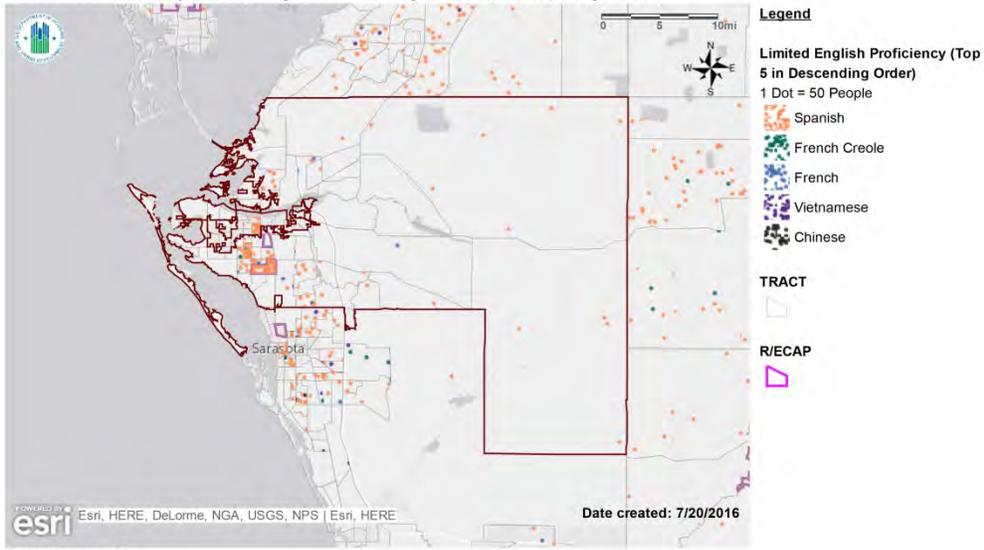


**Name:** Map 3 - National Origin  
**Description:** Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs  
**Jurisdiction:** Manatee County (CDBG, HOME, ESG)  
**Region:** North Port-Sarasota-Bradenton, FL

LEP segregation patterns are evident in **Figure 3** from the concentration of Spanish-speaking individuals in southeast Bradenton and within the County’s southernmost R/ECAP area, as well as Palmetto and the area between SR 70 and University Parkway near I-75. The distribution of other languages is more limited but less concentrated in any particular area.

**Figure 3: Segregation/Integration by LEP Group**

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Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

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Housing Tenure and Segregation/Integration

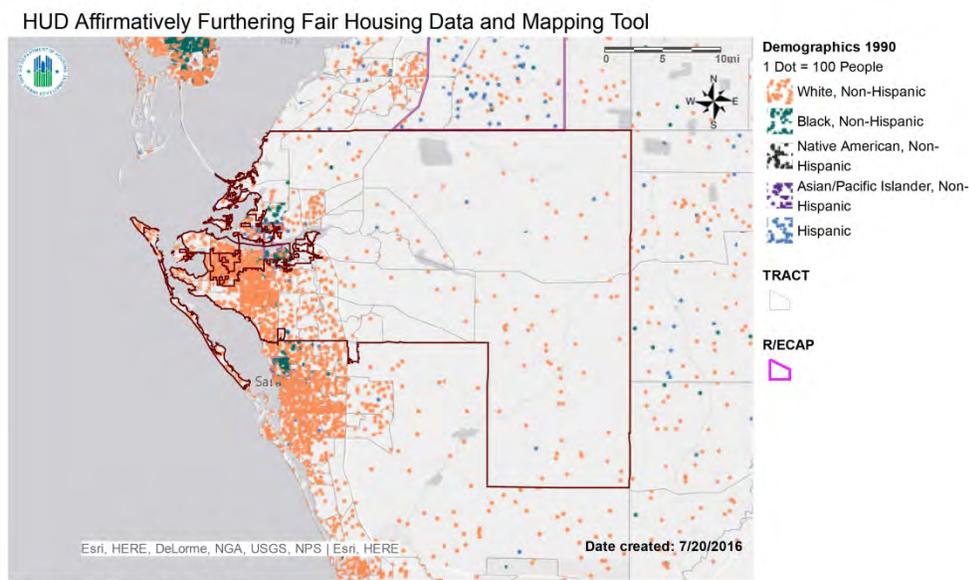
Considering the HUD CPD Maps data and the AFFH Data and Mapping Tool, in general, areas of segregation are characterized by a higher percentage of renter-occupied units, with the exception of the Palmetto area, which has a higher percentage of owner-occupied units.

Renter-occupied units are concentrated near downtown Bradenton (generally east of 14<sup>th</sup> St. West and north of 20<sup>th</sup> Ave. E.) as well as in West Samoset and South Bradenton. Unlike owner-occupied units, areas with higher concentrations of renter-occupied units are not specific to any particular race/ethnicity, National Origin, or LEP group, but do correspond to more urban areas of the County.

Patterns of Segregation and Trends over Time (Since 1990)

According to the AFFH Data and Mapping Tool (Race/Ethnicity Trends, 1990 and 2000), patterns of segregation and integration have stayed relatively constant since 1990, with the exception of southeast Bradenton, in which the Black and Hispanic population has become increasingly concentrated since 1990. See **Figure 1** compared to **Figures 4-5**.

**Figure 4: Segregation/Integration by Race/Ethnicity (1990)**



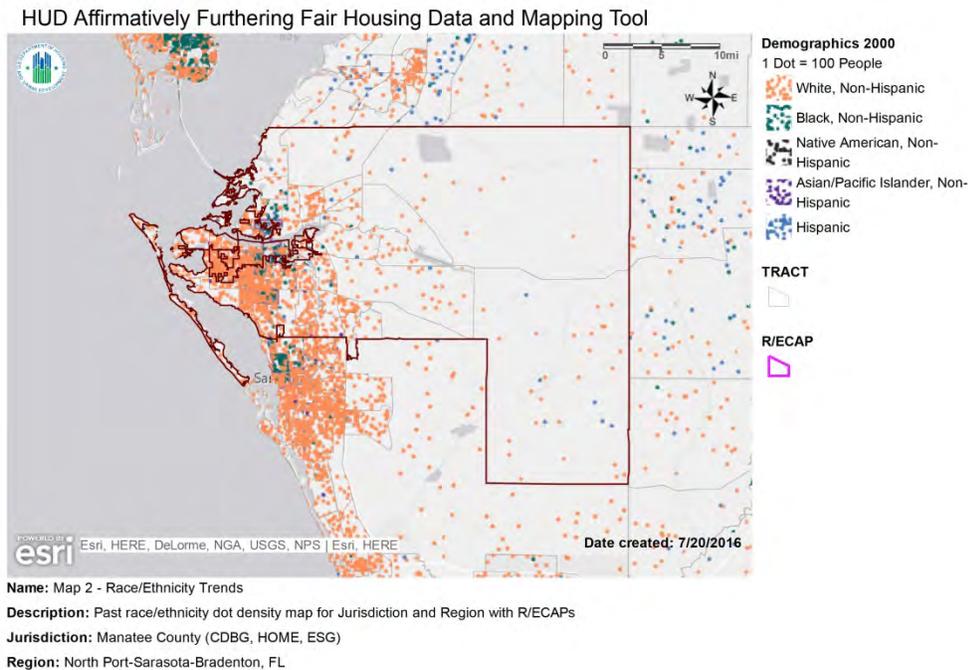
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

**Figure 5: Segregation/Integration by Race/Ethnicity (2000)**



Demographic Trends, Policies, or Practices That Could Lead to Segregation

Future population projections for Manatee County, as sourced from University of Florida Bureau of Economic and Business Research (BEBR), medium projections, indicate a significant change in population toward the year 2020. The projected population is expected to increase by 10% between the year 2015 and the year 2020, an increase that could influence segregation via changing development patterns. However, there are no specific zoning and land-use policies in Manatee County that encourage higher segregation. Current zoning regulations do not discriminate based on race/ethnicity, national origin, LEP, income level, or family status. Residential and related neighborhood commercial uses are permitted throughout the County. The current distribution of housing in Manatee County results from historical patterns of development as well as market demand. Existing demographic disparities result, in part, from a combination of market forces that produce lower home values in some areas and higher home values in others. These forces include aging housing stock and lack of access to desired amenities.

Contributing Factors of Segregation

Contributing factors of segregation include higher levels of poverty as well as lower levels of educational attainment, income, and language proficiency when compared to Manatee County as a whole, resulting in a lack of economic opportunity that limits housing choice.

### 5.2.2 R/ECAPs

A racially or ethnically concentrated area of poverty (R/ECAP) is a geographic area with significant concentrations of poverty and minority concentrations. A large body of research has consistently found that the problems associated with segregation are intensified when combined with concentrated poverty. Neighborhoods of concentrated poverty may isolate residents from the resources and networks needed. Concentrated poverty has also been found to have a long-term effect on outcomes for children growing up in these neighborhoods related to a variety of indicators, including crime, health and education, future employment, and lifetime earnings. A R/ECAP analysis addresses concerns raised in the legislative history of the Fair Housing Act. The 1968 Kerner Commission on Civil Disorders acknowledged that “segregation” and poverty” create “a destructive environment”.

#### R/ECAP Census Tracts within the Jurisdiction

In Manatee County, there are three (3) R/ECAP census tracts (see **Figures 1-3**, area outlined in purple). The County’s current R/ECAPs are located near the City of Bradenton. The northern R/ECAP is located southeast of downtown Bradenton, between 1<sup>st</sup> St./U.S. 41 and 15<sup>th</sup> St. E. (south of U.S. 301 and north of 44<sup>th</sup> Ave. E./Cortez Rd.). The southern R/ECAP is located south of Bradenton, between 14<sup>th</sup> St. W. and 15<sup>th</sup> St. E. (south of 53<sup>rd</sup> Ave. E. and north of 63<sup>rd</sup> Ave. E.).

#### Protected Classes Disproportionately Residing in R/ECAPs

Both of these R/ECAPs are urban neighborhoods in character and contain a greater concentration of Black and Hispanic population than the surrounding area. With that, there is also a significant White population in these neighborhoods, indicating some integration.

In terms of National Origin and LEP, the southern R/ECAP contains a significant concentration of persons from Mexico and a Spanish-speaking population with limited English proficiency; whereas the northern R/ECAP does not.

**Table 4** of the AFFH Data and Mapping Tool identifies the R/ECAPs in Manatee County and the North Port-Sarasota-Bradenton region at the time of the decennial census. In Manatee County, the race/ethnicity of the population in R/ECAPs is predominately White (32%) and Hispanic (48%), with a significant Black population (18%). Compared to the region’s R/ECAPs, Manatee County’s R/ECAPs have a higher percentage of Hispanic population and a lower percentage of Black population. Other race/ethnicity groups comprise less than 1% of the R/ECAP population in both Manatee County and the region. Over half (52%) of the population in Manatee County’s R/ECAPs are families with children. Of the population in Manatee County’s R/ECAPs, approximately 13% originated in Mexico, 3% originated in El Salvador, and 1% originated in Guatemala.

**Table 4: R/ECAP Demographics**

	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction		(North Port-Sarasota-Bradenton, FL CBSA) Region	
R/ECAP Race/Ethnicity	#	%	#	%
Total Population in R/ECAPs	14,795	-	18,646	-
White, Non-Hispanic	4,724	31.93%	4,942	26.50%
Black, Non-Hispanic	2,592	17.52%	5,903	31.66%
Hispanic	7,156	48.37%	7,401	39.69%
Asian or Pacific Islander, Non-Hispanic	32	0.22%	39	0.21%
Native American, Non-Hispanic	37	0.25%	43	0.23%
Other, Non-Hispanic	21	0.14%	27	
R/ECAP Family Type				
Total Families in R/ECAPs	3,209	-	4,119	-
Families with children	1,685	52.51%	2,108	51.18%
R/ECAP National Origin	Country		Country	
Total Population in R/ECAPs	14,795	-	18,646	-
#1 country of origin	Mexico	1,957 13.23%	Mexico	2,718 14.58%
#2 country of origin	El Salvador	486 3.28%	El Salvador	486 2.61%
#3 country of origin	Guatemala	170 1.15%	Haiti	266 1.43%
#4 country of origin	India	124 0.84%	Guatemala	170 0.91%
#5 country of origin	Colombia	47 0.32%	Cuba	149 0.8%
#6 country of origin	Honduras	43 0.29%	India	124 0.67%
#7 country of origin	Dominican Republic	27 0.18%	Vietnam	109 0.58%
#8 country of origin	Haiti	22 0.15%	Honduras	97 0.52%
#9 country of origin	Italy	19 0.13%	Colombia	47 0.25%
#10 country of origin	Philippines	17 0.11%	Dominican Republic	27 0.14%

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

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

R/ECAPs and Trends over Time (since 1990)

Looking back in time, no R/ECAPs were identified for the year 1990 or the year 2000.

Contributing Factors of R/ECAPs

Contributing factors include higher levels of poverty and lower levels of educational attainment, income, and language proficiency in R/ECAP Census Tracts when compared to Manatee County as whole, resulting in a lack of economic opportunity for persons living in R/ECAPs that limits housing choice.

### 5.2.3 *Disparities in Access to Opportunity*

An opportunity analysis promotes the purposes of the Fair Housing Act, as described in the legislative history and reflected in the statute and regulations. As Congress was working to pass the Fair Housing Act, Senator Phillip Hart emphasized the relationship between housing and opportunity stating, “where a family lives, where it is allowed to live is inextricably bound up with better education, better jobs, economic motivation, and good living conditions”.

Because housing is part of a community, an important component of fair housing planning is to assess how a person’s place of residence, public and private investment choices, and state and local policies relating to schools, transportation, employment, environmental health, and community development affect access to opportunity, and which individuals and groups with protected characteristics are most affected by a lack of, or inability to access, opportunity.

Addressing disparities in access to opportunity may involve a balanced approach that provides for both strategic investments in areas that lack key opportunity indicators, and also works to open up housing opportunities in areas with existing opportunity through effective mobility options and the preservation and development of affordable housing in high opportunity areas.

#### *Educational Opportunities Analysis*

The AFFH Data and Mapping Tool, accessed in July 2016, provides a map of school proficiency for Manatee County and the North Port-Sarasota-Bradenton region. As shown in **Figures 6-7**, school proficiency is highest in eastern Manatee County, generally south of SR 70 and east of I-75. School proficiency is also higher along Palma Sola Bay and Sarasota Bay toward the barrier islands. School proficiency is lowest east of Bradenton’s downtown and along US 41 and US 301, south of the Manatee River. In areas of greater segregation by race/ethnicity and national origin within Manatee County (i.e., southeast Bradenton, the southernmost R/ECAP area, and Palmetto), school proficiency is low-to-moderate. In general, the most urbanized areas of the County, including Palmetto and eastern Bradenton, have the lowest school proficiency; whereas suburban and rural areas have higher school proficiency.

**Figure 8** shows school proficiency and family status. Across Manatee County, the percentage of families with children ranges from 0% to 80% and school proficiency is low-to-moderate. As shown in **Figure 8**, the percentage of families with children is higher in urbanized areas of the County such as Palmetto, Bradenton, and the unincorporated areas surrounding Bradenton, including the three (3) R/ECAP areas. The percentage of families with children is generally lower near Palma Sola Bay and Sarasota Bay toward the barrier islands, and in neighborhoods near I-75 that are more distant from the County’s urban core. Areas where there is a high percentage of children with families combined with a low index of school proficiency are located east of Bradenton’s downtown and along US 41 and US 301, south of the Manatee River.

Figure 6: School Proficiency and Race/Ethnicity (2010)

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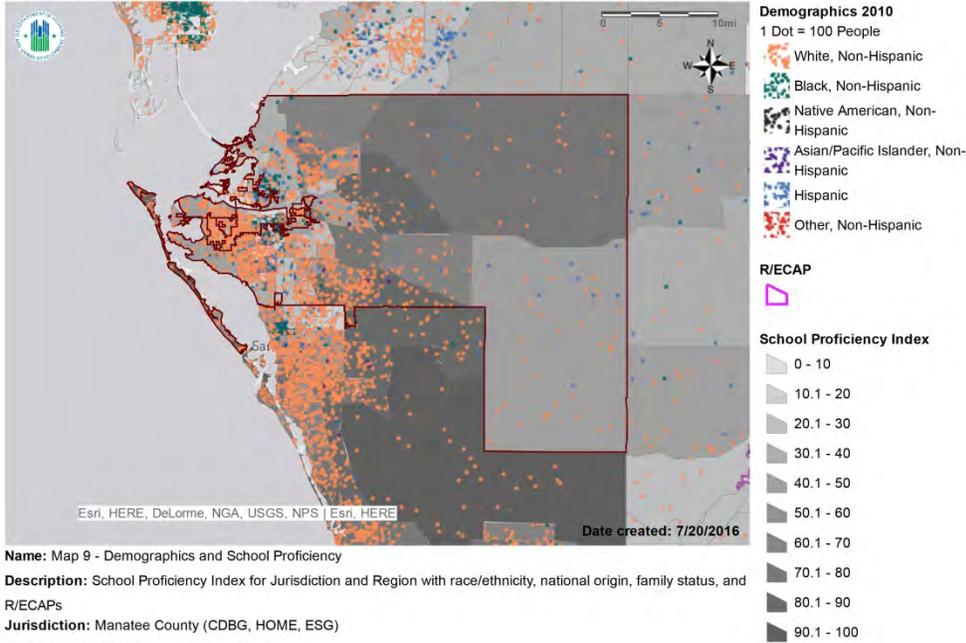
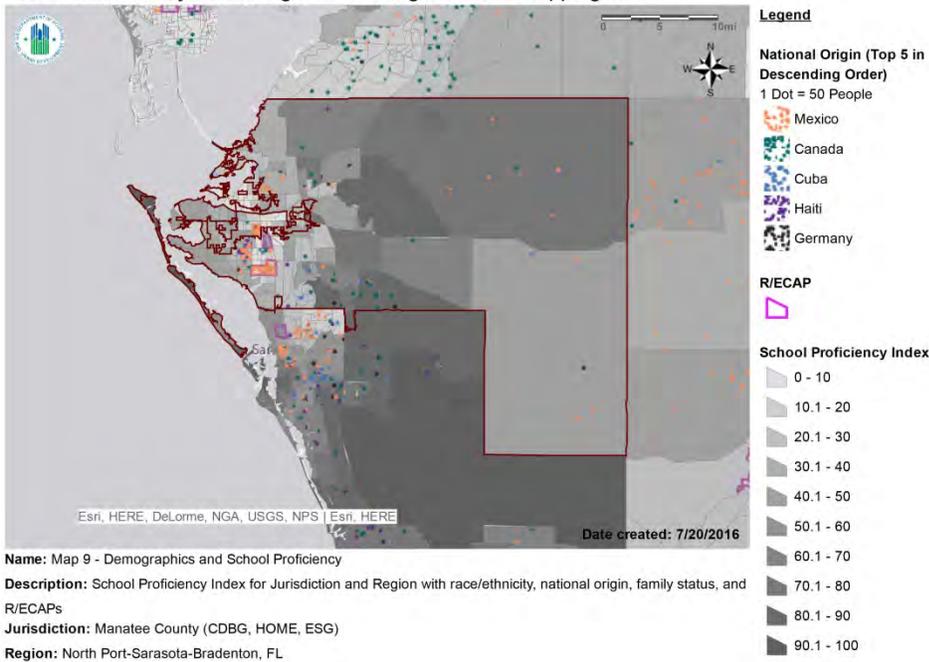
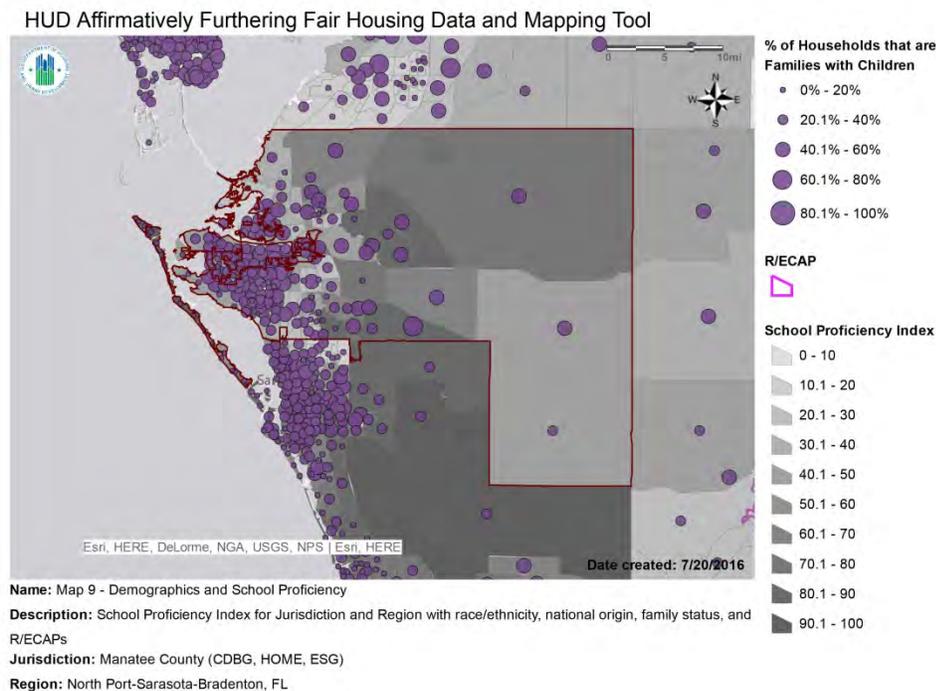


Figure 7: School Proficiency and National Origin

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**Figure 8: School Proficiency and Family Status**



Employment Opportunities Analysis

The AFFH Data and Mapping Tool, accessed in July 2016, provides data and maps regarding job proximity and labor market for Manatee County and the North Port-Sarasota-Bradenton region.

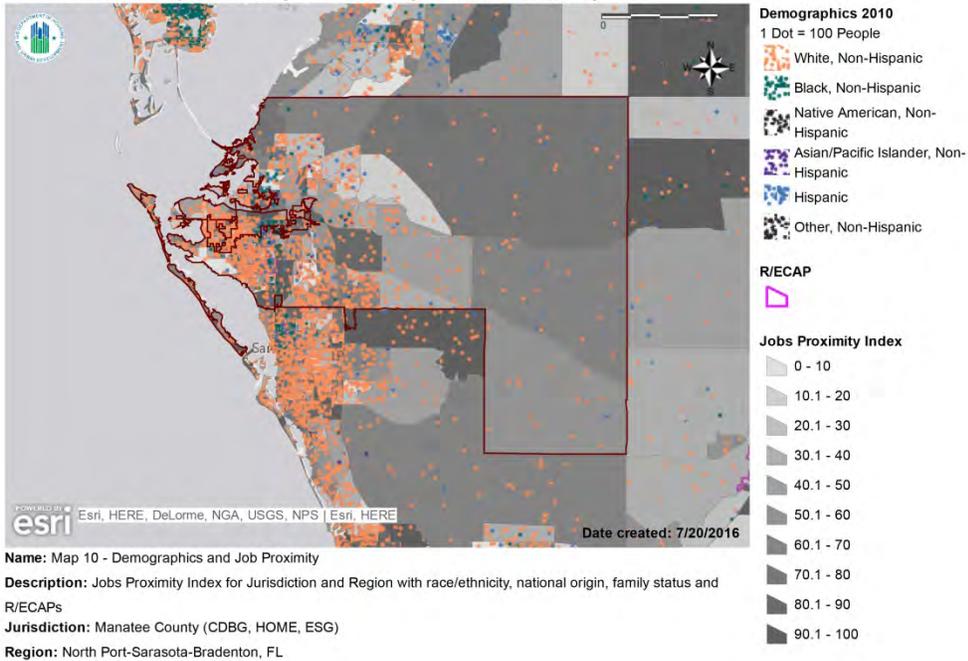
Job Proximity

The Job Proximity Index measures the physical distances between the place of residence and jobs. As shown in **Figures 9-10**, job proximity is highest in areas abutting the County’s major highways and interstates (e.g. US 301, I-275, and I-75). Additionally, job proximity is lower in areas of greater segregation by race/ethnicity and national origin within Manatee County (i.e., south of downtown Bradenton, the three (3) R/ECAP areas, and Palmetto). Job proximity is also low in southwest Bradenton toward Palma Sola Bay and Sarasota Bay, and in rural areas of the County between I-75 and Parrish. These areas have low-to-moderate job proximity whereas the areas abutting US 301, I-275, and I-75 have moderate-to-high job proximity.

**Figure 11** shows job proximity and family status. Across Manatee County, the percentage of families with children ranges from 0% to 80% and job proximity is low-to-high. As shown in **Figure 11**, the percentage of families with children is highest near Bradenton and the County’s urban core. The percentage of families with children is generally lower toward the barrier islands. Although there is no clear pattern of areas having a higher percentage of families with children and lower job proximity, 40% to 80% of households in the County’s three (3) R/ECAP areas are families with children and these areas have low-to moderate job proximity.

Figure 9: Job Proximity and Race/Ethnicity (2010)

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Figure 10: Job Proximity and National Origin

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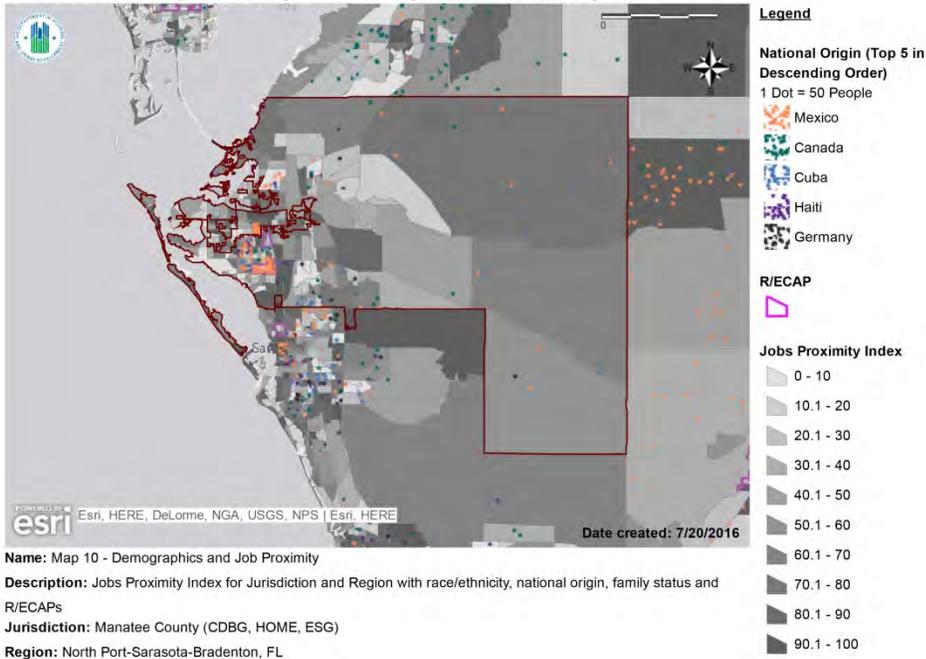
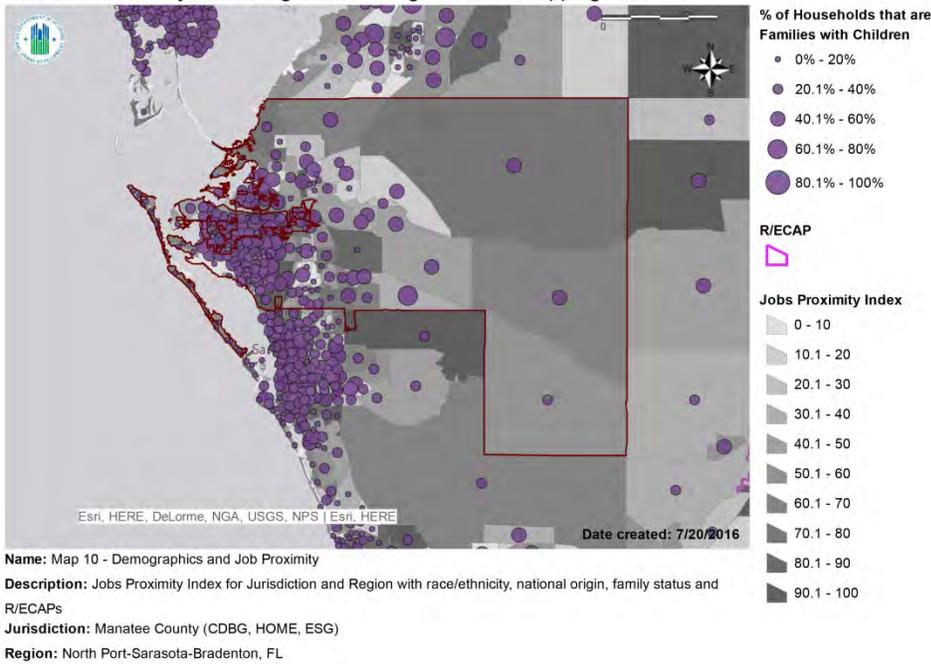


Figure 11: Job Proximity and Family Status

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**Labor Market**

The Labor Market Index measures unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor’s degree, by census tract. As shown in **Figures 12-13**, labor market engagement is low-to-moderate throughout Manatee County, with the lowest labor market engagement in the three (3) R/ECAP areas south of Bradenton. Additionally, labor market engagement is low in all census tracts north of I-275. Areas of greater segregation coincide with areas of lower labor market engagement, particularly in the R/ECAP areas and south of Bradenton along US 41 and US 301. Labor market engagement is generally higher in western Manatee County and along I-75 south of SR 70 or north of SR 64.

**Figure 14** shows labor market engagement and family status. Across Manatee County, the percentage of families with children ranges from 0% to 80% and labor market engagement is low-to-moderate. Areas with a higher percentage of families with children and lower labor market engagement correspond to areas of greater segregation in downtown Bradenton and the unincorporated areas south of downtown Bradenton. It is important to note that the areas of lowest labor market engagement (Index 0-10) correspond to the three (3) R/ECAP areas.

**Figure 12: Labor Market and Race/Ethnicity (2010)**

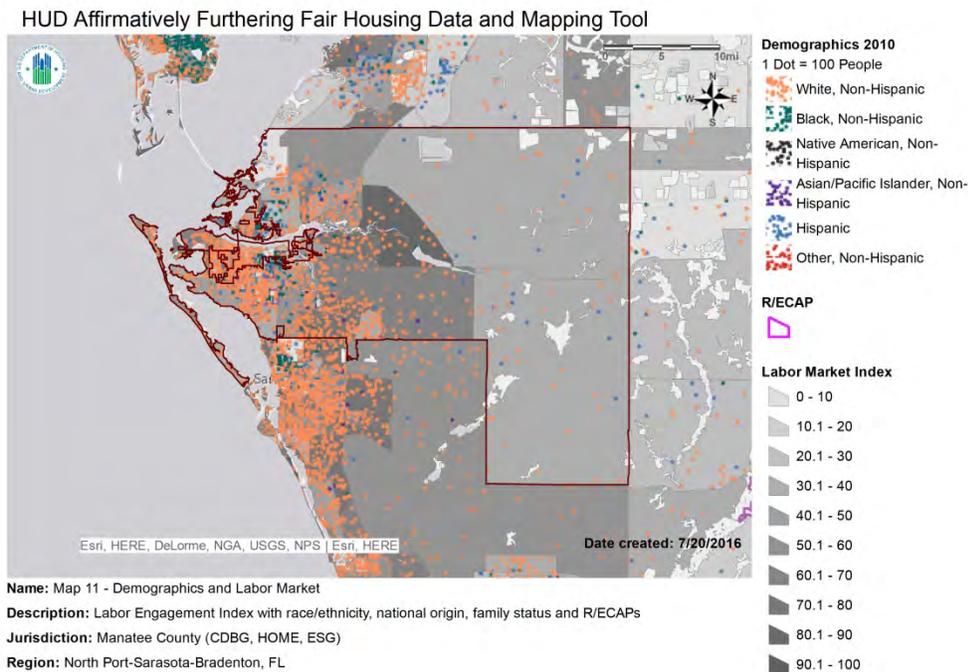
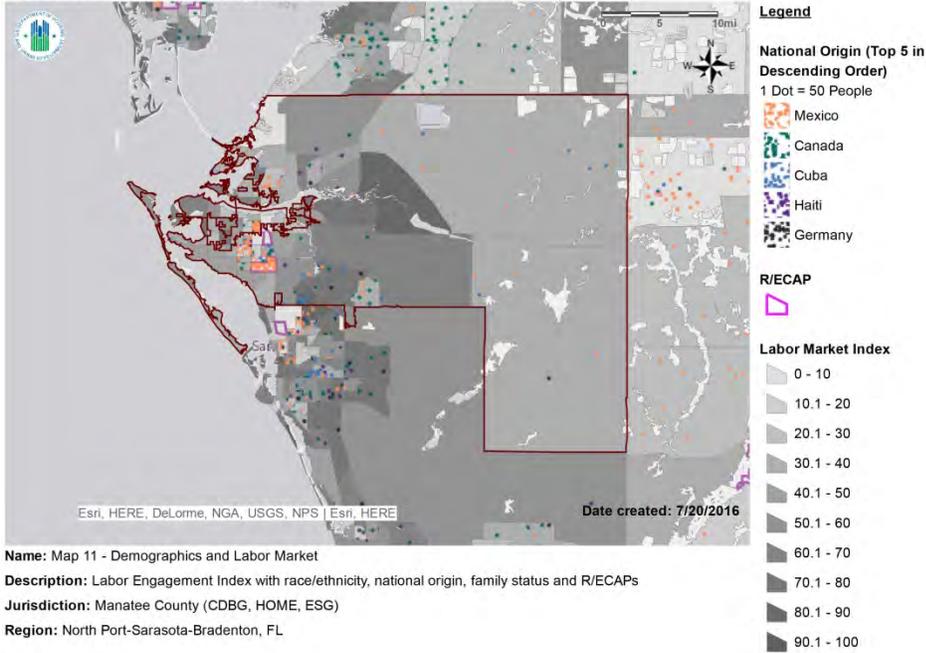


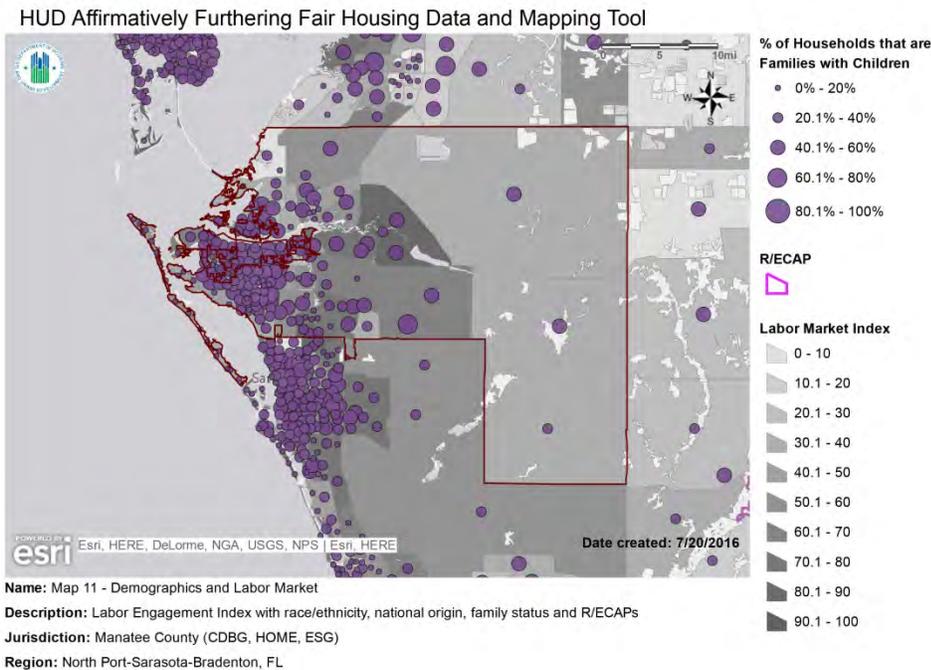
Figure 13: Labor Market and National Origin

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**Figure 14: Labor Market and Family Status**



Transportation Opportunities Analysis

The AFFH Data and Mapping Tool, accessed in July 2016, provides data and maps regarding transit trips and transportation cost for Manatee County and the North Port-Sarasota-Bradenton region.

Transit Trips

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation as an index of the availability of public transportation. **Figures 15-16** show that low-income families living in the R/ECAP areas south of Bradenton use public transportation moderately, indicating some access to public transportation in a more segregated area. Low-income families living west of US 301, with a mix of segregated and integrated neighborhoods, also use public transportation moderately. Families living east of I-75 use public transportation less often or not at all. No census tracts show significant use of public transportation, indicating that public transportation may be less available or too costly for low-income families in Manatee County.

Respective to family status, low-income families living in the R/ECAP areas west of US 301 use public transportation moderately and also have a higher percentage of families with children. See **Figure 17**.

Figure 15: Transit Trips and Race/Ethnicity (2010)

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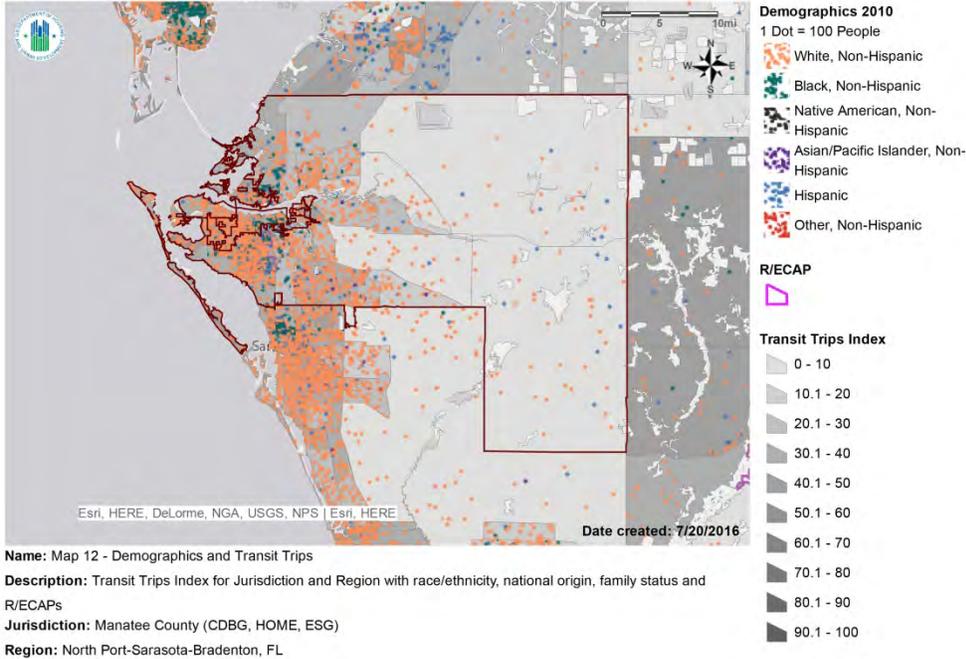


Figure 16: Transit Trips and National Origin

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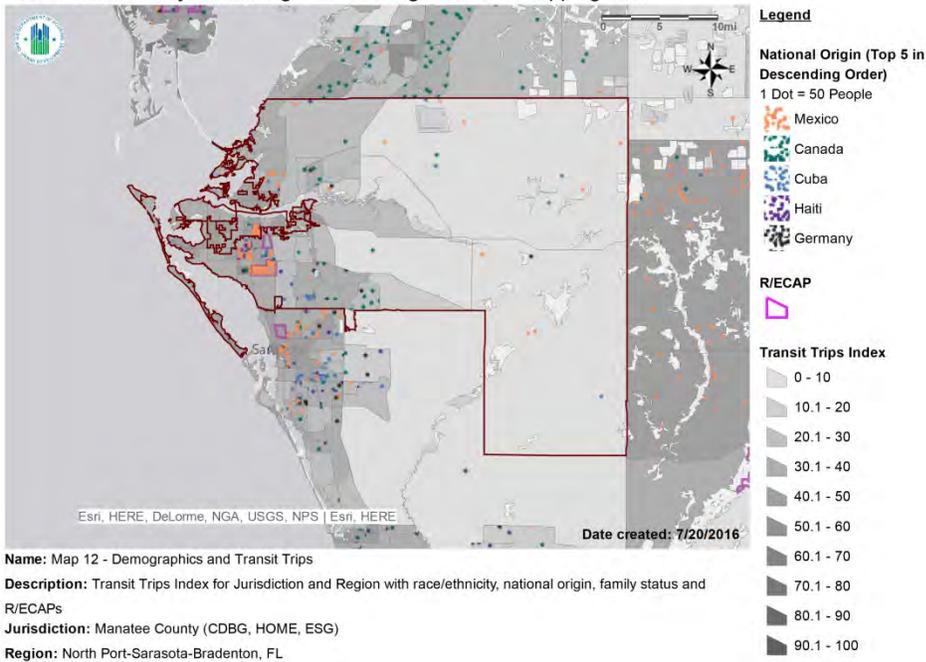
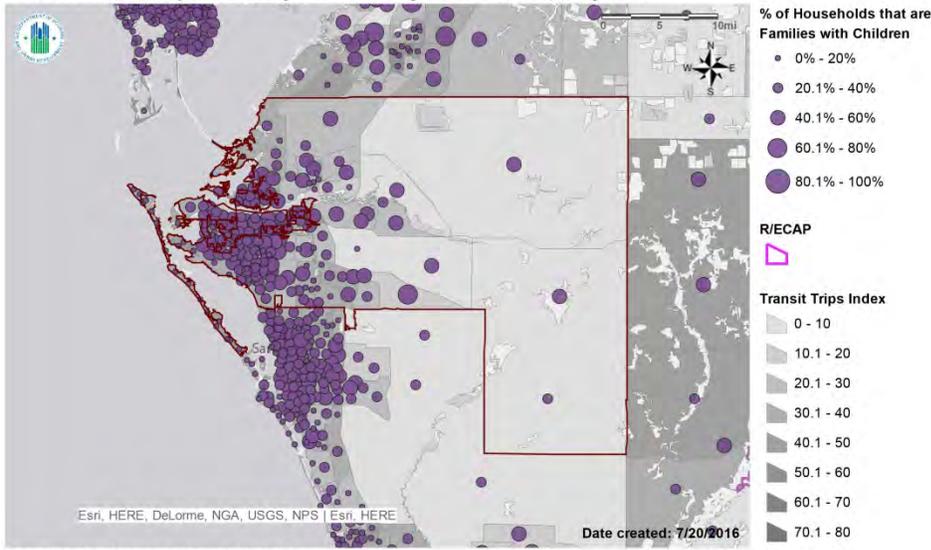


Figure 17: Transit Trips and Family Status

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Name: Map 12 - Demographics and Transit Trips

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

**Low Transportation Cost**

The Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. **Figures 18-19** show that the Low Transportation Cost Index is low-to-moderate throughout Manatee County, with the highest indexed areas near Palmetto and the unincorporated area south of Bradenton. Areas of known race/ethnicity and national origin segregation appear as moderate on the index. The lowest indexed areas are east of I-75 in rural Manatee County.

**Figure 20** shows the Low Transportation Cost Index in regard to family status. Areas with a higher percentage of families with children generally correspond to areas with a higher Low Transportation Cost Index; however, these patterns are more variable at the neighborhood level.

**Figure 18: Low Transportation Cost and Race/Ethnicity (2010)**

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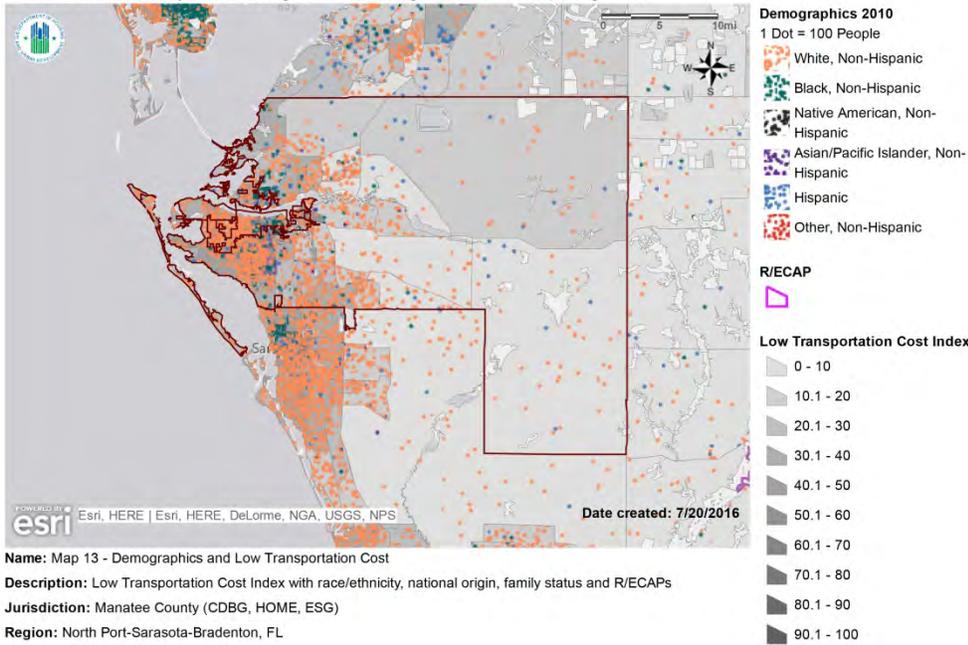
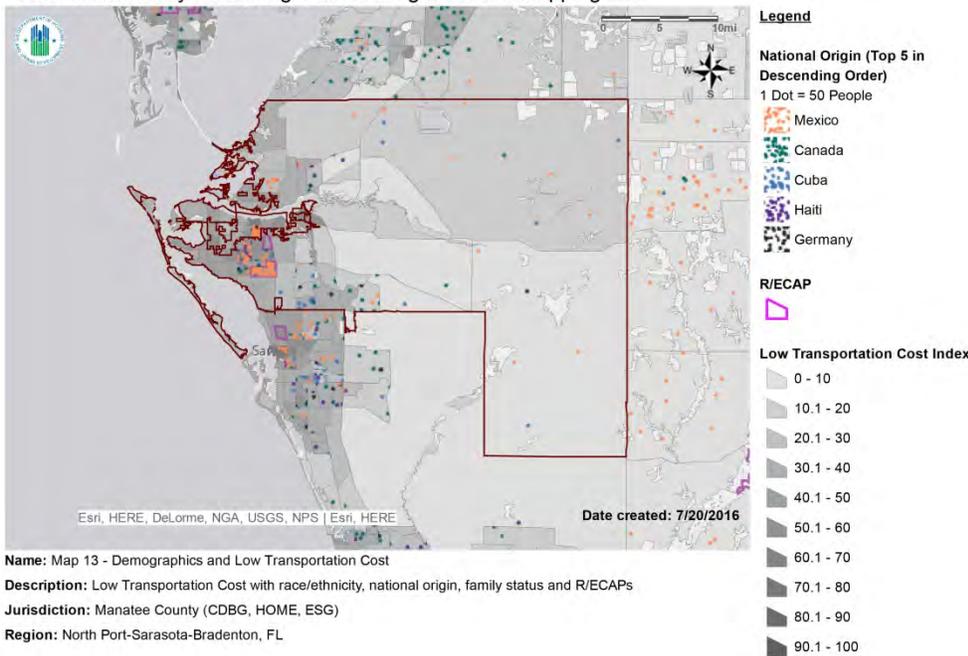


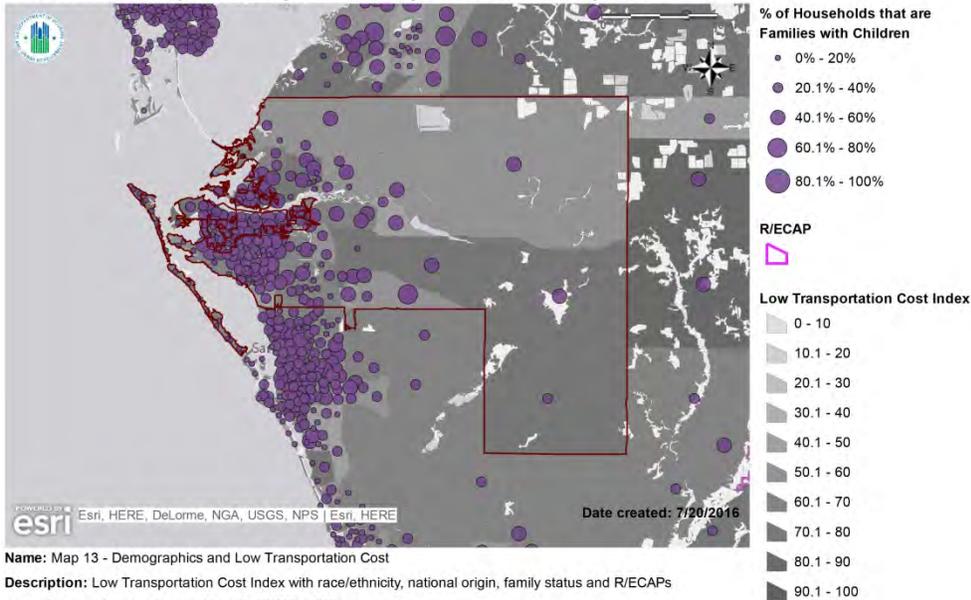
Figure 19: Low Transportation Cost and National Origin

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**Figure 20: Low Transportation Cost and Family Status**

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Low Poverty Exposure Opportunities Analysis

The AFFH Data and Mapping Tool, accessed in July 2016, provides data and maps regarding poverty exposure for Manatee County and the North Port-Sarasota-Bradenton region.

The Low Poverty Exposure Index measures the poverty rate by neighborhood, where a higher value on the index indicates greater access to low poverty neighborhoods. **Figures 21-22** show that the Low Poverty Exposure Index is low-to-high throughout Manatee County and the greater North Port-Sarasota-Bradenton region. Known areas of greater segregation by race/ethnicity and national origin have relatively lower access to low poverty neighborhoods compared to areas more peripheral to the County’s urban core (e.g. west Bradenton and the rural areas east of I-75). The County’s three (3) R/ECAP areas have the least access to low poverty neighborhoods in Manatee County.

Respective to family status, the likelihood that a family may live in a low poverty neighborhood does not appear to coincide with family status. See **Figure 23**.

**Figure 21: Low Poverty Exposure and Race/Ethnicity (2010)**

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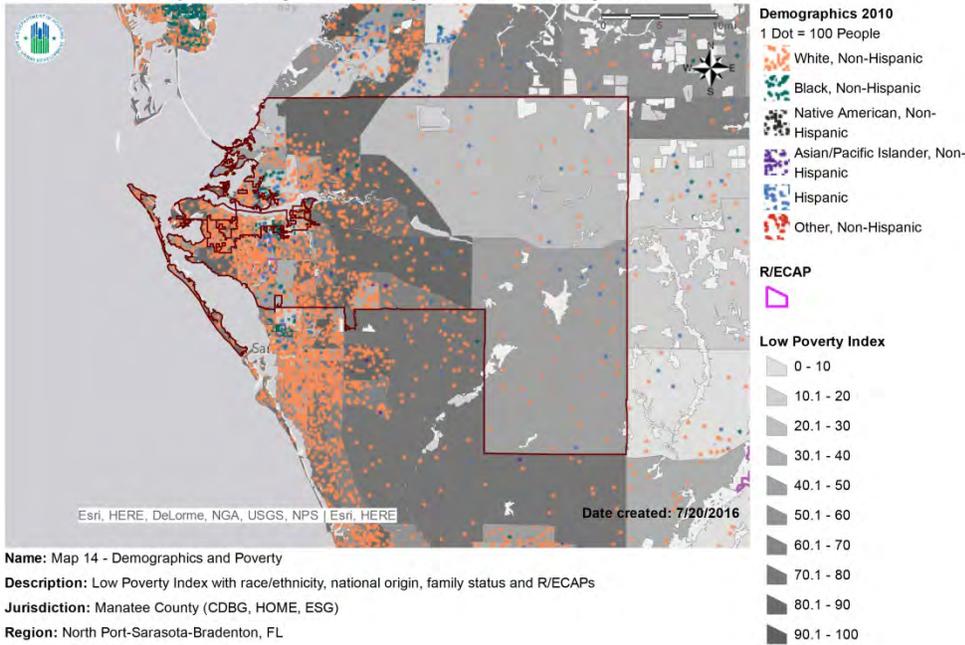


Figure 22: Low Poverty Exposure and National Origin

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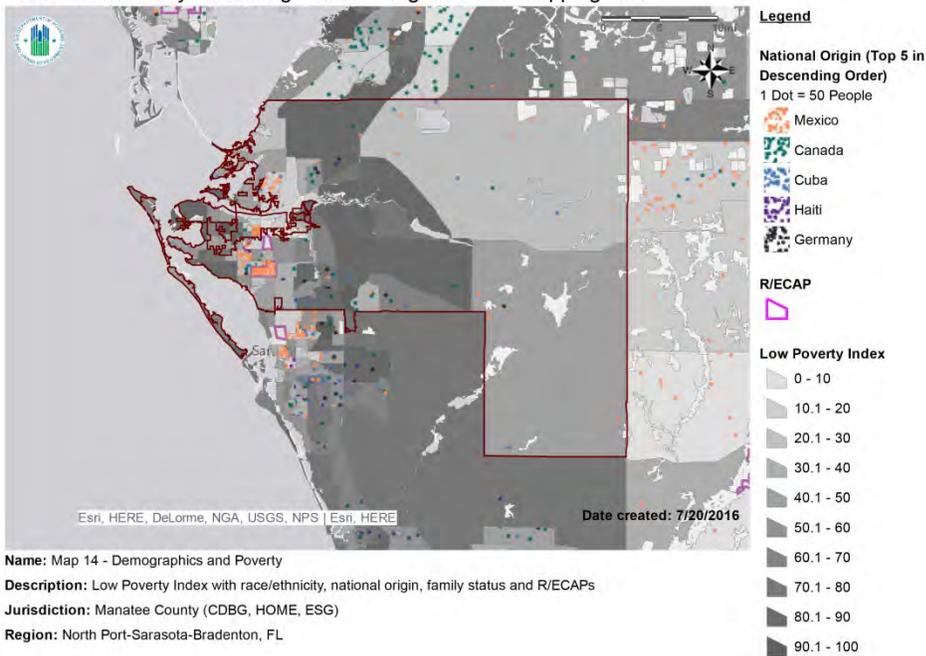
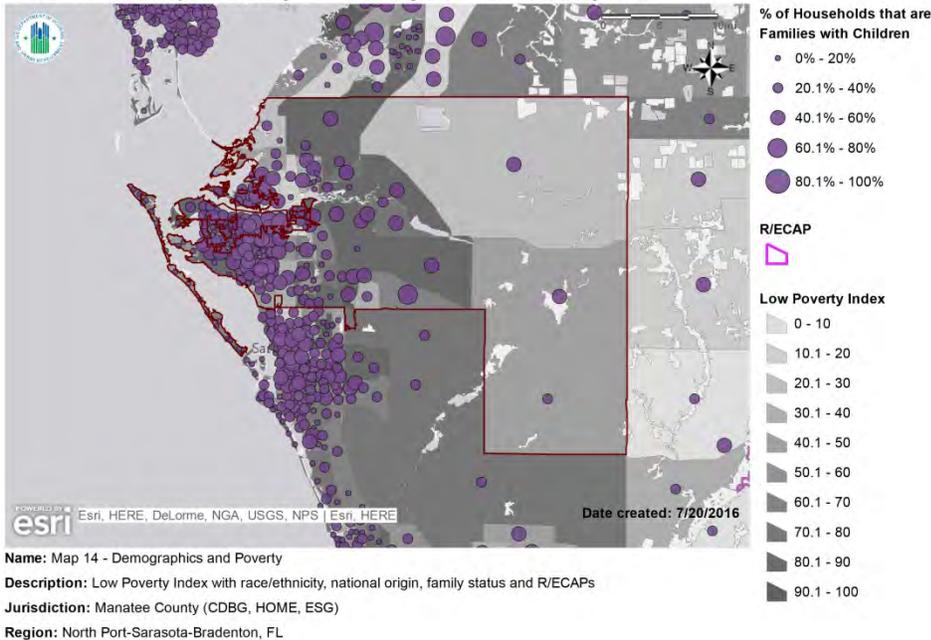


Figure 23: Low Poverty Exposure and Family Status

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Environmentally Healthy Neighborhoods Opportunities Analysis

The AFFH Data and Mapping Tool, accessed in July 2016, provides data and maps regarding environmental health for Manatee County and the North Port-Sarasota-Bradenton region.

The Environmental Health Index uses data on hazardous air pollutants that are known to cause cancer or other serious health effects. A higher value on the index indicates greater access to environmental health (i.e., less exposure), whereas a lower value on the index indicates less access to environmental health (i.e., more exposure). This data is generalized and shows broader overall patterns rather than specific neighborhood conditions. **Figures 24-25** show that the Environmental Health Index is moderate throughout Manatee County and moderate-to-high within the greater North Port-Sarasota-Bradenton region. The southern R/ECAP area containing a known area of segregation by race/ethnicity and national origin shows a lower, although moderate, index of environmental health. The northern R/ECAP area also shows a lower, although moderate, index. The lowest index is in the eastern half of the southern R/ECAP, although the reasons for this are unknown. While the unincorporated area south of downtown Bradenton has the least access to environmental health compared to other areas of the County, this area still appears as moderate on the index. Other areas of lower, although moderate, indices of environmental health include areas southwest of SR 64 and I-75 and southeast of University Parkway and I-75.

Respective to family status, access to an environmentally healthy neighborhood does not appear to coincide with family status. See **Figure 26**.

Figure 24: Environmental Health and Race/Ethnicity (2010)

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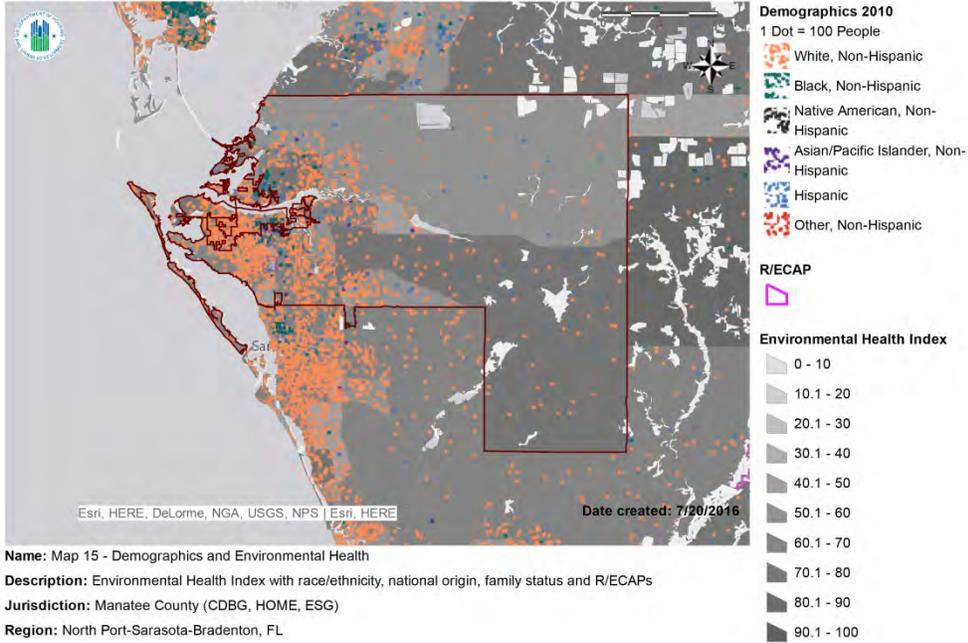
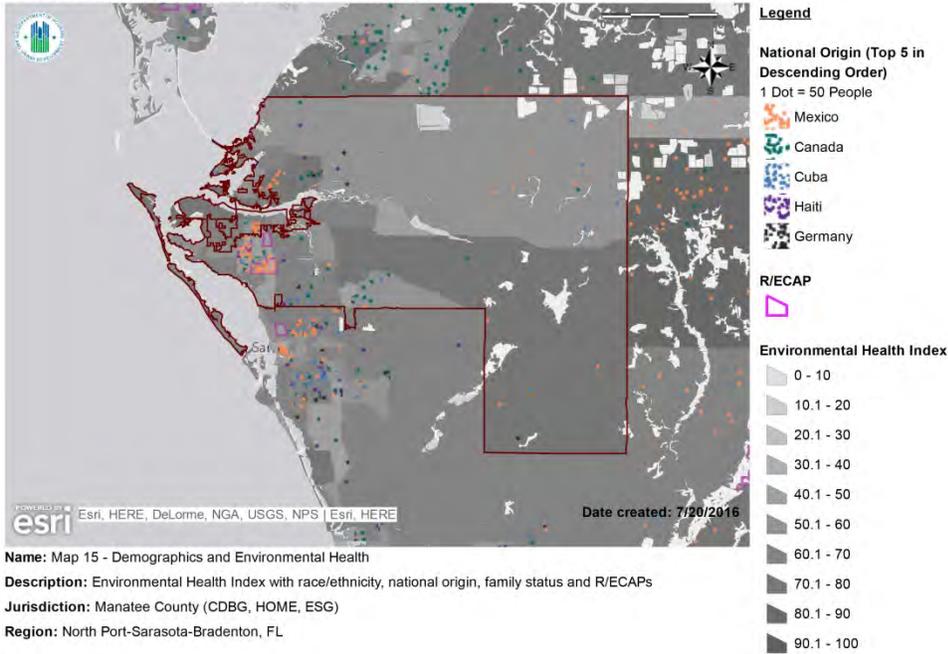


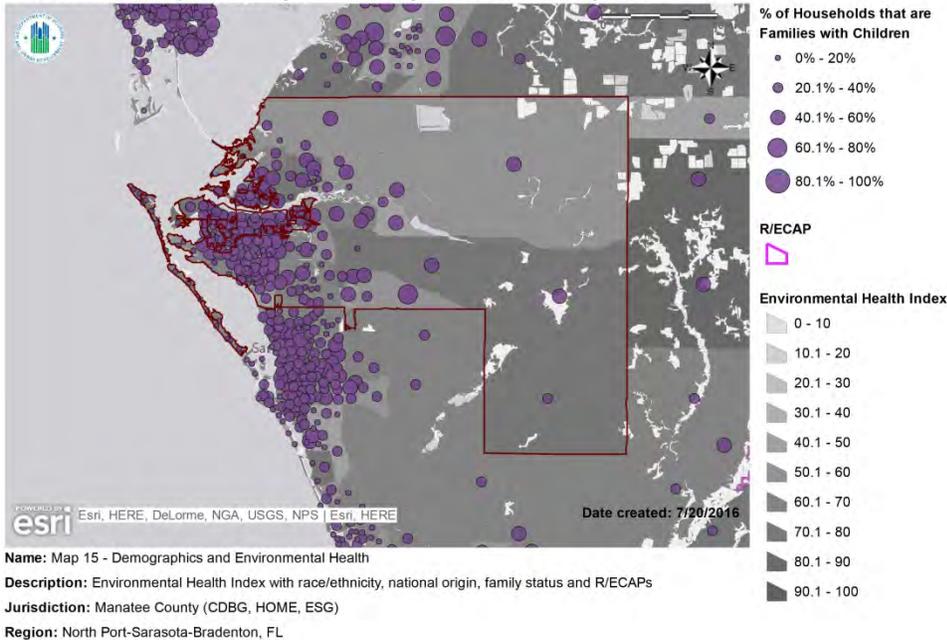
Figure 25: Environmental Health and National Origin

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**Figure 26: Environmental Health and Family Status**

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*Patterns in Disparities in Access to Opportunity*

**Table 5** shows the opportunity indices previously mapped and discussed for each race/ethnicity in Manatee County and the greater North Port-Sarasota-Bradenton region. Higher values for a particular race/ethnicity group indicate a greater likelihood that the group has access to that opportunity factor. For example, a high value in the School Proficiency Index would indicate greater access to proficient schools whereas a low value in the School Proficiency Index would indicate less access to proficient schools. This data is shown both for the total population and for the population below poverty level.

Considering all opportunity indices for the total population of Manatee County, the Asian or Pacific Islander population has the greatest access in four (4) of the seven (7) opportunity indicators: low poverty, school proficiency, labor market, and environmental health. However, the Asian or Pacific Islander population also has the least access in three (3) of the seven (7) opportunity indicators: transit, low transportation cost, and jobs proximity. The Hispanic population has the least access in three (3) of the seven (7) opportunity indicators: low poverty, labor market, and environmental health. This disparity is not reflected, however, for low transportation cost, as the Hispanic population has the greatest access to low transportation cost when compared to other race/ethnicity groups. This indicates a pattern of disparity in access to some but not all opportunities for the Asian or Pacific Islander population and Hispanic population. Comparatively, the Black population has greater access to transit and jobs proximity, but less access to school proficiency than other race/ethnicity groups.

These disparities in access to opportunity differ when poverty level is considered. Considering all opportunity indices and poverty level for Manatee County, the Asian or Pacific Islander population

below poverty level has the greatest access in four (4) of the seven (7) opportunity indicators: low poverty, labor market, jobs proximity, and environmental health; but also has the least access to transit. In contrast, the Native American population below poverty level has the least access in four (4) of the seven (7) opportunity indicators: low poverty, school proficiency, labor market, and environmental health; but also has the greatest access to transit and low transportation. This indicates a pattern of disparity in access to opportunity for the Asian or Pacific Islander population below poverty level and the Native American population below poverty level.

The patterns in disparity for the North Port-Sarasota-Bradenton region show patterns of less access to opportunity for the Black population with regard to low poverty, school proficiency, and labor market; and for the Asian or Pacific Islander population with regard to transit, low transportation, and jobs proximity. Greater access to opportunity exists for the Black population with regard to transit and low transportation cost; and for the Asian or Pacific Islander population with regard to low poverty, labor market, and environmental health.

For the population below poverty level in North Port-Sarasota-Bradenton, less access to opportunity is not associated with any particular race/ethnicity group; however, greater access to opportunity exists for the Asian or Pacific Islander population in four (4) opportunity indicators: low poverty, labor market, jobs proximity, and environmental health.

**Table 5: Opportunity Indicators by Race/Ethnicity**

(Manatee County, FL CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	58.24	49.26	49.45	32.23	30.07	45.70	62.18
Black, Non-Hispanic	35.60	36.30	33.85	34.94	37.20	46.52	59.19
Hispanic	35.29	38.15	33.62	34.48	37.52	44.95	57.88
Asian or Pacific Islander, Non-Hispanic	64.40	50.97	54.32	31.02	28.09	43.51	62.95
Native American, Non-Hispanic	48.07	44.35	41.44	33.79	34.59	43.99	60.59
<b>Population below federal poverty line</b>							
White, Non-Hispanic	47.89	39.95	41.87	34.69	35.73	45.23	59.92
Black, Non-Hispanic	23.56	33.42	27.41	36.99	41.53	41.56	56.68
Hispanic	21.15	36.37	23.88	37.01	41.48	45.45	54.93
Asian or Pacific Islander, Non-Hispanic	48.02	33.69	43.73	29.95	36.71	51.18	62.92
Native American, Non-Hispanic	20.41	30.47	9.31	45.16	60.85	45.21	50.28
<b>(North Port-Sarasota-Bradenton, FL CBSA) Region</b>							
<b>Total Population</b>							
White, Non-Hispanic	57.01	58.77	48.74	31.83	30.37	46.76	59.75
Black, Non-Hispanic	30.25	40.38	30.52	36.37	40.09	46.38	58.82
Hispanic	37.37	43.02	36.29	35.22	38.30	47.28	58.61
Asian or Pacific Islander, Non-Hispanic	59.24	57.32	52.33	31.32	30.03	45.70	60.76
Native American, Non-Hispanic	49.09	53.86	43.22	33.64	34.21	47.59	59.80
<b>Population below federal poverty line</b>							
White, Non-Hispanic	49.44	54.16	43.12	33.59	33.85	46.50	58.68
Black, Non-Hispanic	20.81	38.94	23.43	38.24	43.58	49.03	56.68
Hispanic	25.85	38.66	29.96	37.14	41.86	50.92	56.91
Asian or Pacific Islander, Non-Hispanic	52.73	48.08	47.69	32.65	36.37	50.97	60.02
Native American, Non-Hispanic	35.23	43.89	26.17	38.34	45.72	44.44	56.09
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).							

*Contributing Factors of Disparities in Access to Opportunity*

Contributing factors of disparities in access to opportunity include poverty rates, low educational attainment, limited English language proficiency, and unemployment. Other factors include lack of access to job training, child care services, and other services that would assist in obtaining employment. These factors combined limit access to economic opportunity.

**5.2.4 Disproportionate Housing Needs**

Whether or not a particular group experiences greater housing needs when compared to other populations in the jurisdiction or region may be determined through an assessment of housing problems such as cost burden, severe cost burden, overcrowding, and substandard housing conditions. For the purposes of this analysis, HUD provides the following definitions of housing problems:

Cost Burden and Severe Cost Burden

Cost burden is the fraction of a household's total gross income spent on housing costs. There are two levels of cost burden:

- Cost Burden – when a household spends more than 30% of their income on housing costs; and
- Severe Cost Burden – when a household spends more than 50% of their income on housing costs.

For renters, housing costs include rent paid plus utilities. For owners, housing costs include mortgage payments, taxes, insurance, and utilities.

Overcrowding

Overcrowding pertains to an excessive number of persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms. There are two levels of overcrowding:

- Overcrowded – having more than 1.01 to 1.5 persons per room; and
- Severely Overcrowded – having more than 1.51 persons per room.

Substandard Housing

Substandard housing pertains to a lack of essential household facilities, such as running water, flushing toilets, bathtub or shower facilities, and kitchen facilities (sinks, ranges/stoves, or refrigerators).

*Disproportionate Housing Needs*

**Table 6** shows the disproportionate housing needs for Manatee County and the North Port-Sarasota-Bradenton region. For purposes of this analysis, disproportionate housing needs are those that are 10 percentage points higher than for the geography (i.e., county or region) as a whole.

**Housing Problems**

Approximately 38% of households in Manatee County experience any one of four housing problems. As shown, more than half (60%) of Black households and 64% of Hispanic households in Manatee County

experience housing problems. These percentages are similar for the greater North Port-Sarasota-Bradenton region. In both Manatee County and the region, the occurrence of housing problems is greater in non-family households and households with five or more people.

In both Manatee County and the region, severe housing problems are least prevalent in White households; however, severe housing problems are most prevalent in Hispanic households. Black, Hispanic, and Other households generally have higher percentages of severe housing problems than other race/ethnicity groups.

Based on the data provided in **Table 6**, disproportionate housing needs may exist for households in the Black, Hispanic, and Other race/ethnicity groups, as well as for non-family households and households with five or more people (i.e., larger households).

**Table 6: Demographics of Households with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction			(North Port-Sarasota-Bradenton, FL CBSA) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
<b>Households experiencing any of 4 housing problems*</b>						
<b>Race/Ethnicity</b>						
White, Non-Hispanic	29,843	87,520	34.10%	95,570	259,680	36.80%
Black, Non-Hispanic	3,506	5,846	59.97%	8,875	14,770	60.09%
Hispanic	5,989	9,332	64.18%	12,345	20,345	60.68%
Asian or Pacific Islander, Non-Hispanic	703	1,553	45.27%	1,494	3,238	46.14%
Native American, Non-Hispanic	45	140	32.14%	140	445	31.46%
Other, Non-Hispanic	369	787	46.89%	965	2,185	44.16%
<i>Total</i>	<i>40,485</i>	<i>105,180</i>	<i>38.49%</i>	<i>119,410</i>	<i>300,690</i>	<i>39.71%</i>
<b>Household Type and Size</b>						
Family households, <5 people	21,238	63,107	33.65%	56,690	170,725	33.21%
Family households, 5+ people	3,668	6,814	53.83%	8,835	16,025	55.13%
Non-family households	15,580	35,278	44.16%	53,875	113,920	47.29%
<b>Households experiencing any of 4 Severe Housing Problems**</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>						
White, Non-Hispanic	14,187	87,520	16.21%	47,715	259,680	18.37%
Black, Non-Hispanic	1,988	5,846	34.01%	5,304	14,770	35.91%
Hispanic	3,800	9,332	40.72%	7,794	20,345	38.31%
Asian or Pacific Islander, Non-Hispanic	395	1,553	25.43%	804	3,238	24.83%
Native American, Non-Hispanic	45	140	32.14%	115	445	25.84%
Other, Non-Hispanic	264	787	33.55%	689	2,185	31.53%
<i>Total</i>	<i>20,710</i>	<i>105,180</i>	<i>19.69%</i>	<i>62,435</i>	<i>300,690</i>	<i>20.76%</i>
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						
Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).						

**Severe Housing Cost Burden**

**Table 7** shows the severe housing cost burden for Manatee County and the North Port-Sarasota-Bradenton region. For purposes of this analysis, disproportionate cost burden is that which is 10 percentage points higher than for the geography (i.e., county or region) as a whole. As shown, 32% of Native American households experience severe housing cost burden. Other Non-Hispanic households (32%) also have a high percentage of households with severe housing cost burden, as do Hispanic households (31%) and Black households (29%). These percentages are similar for the greater North Port-

Sarasota-Bradenton region; however, the occurrence of severe housing cost burden is higher for Black households than for other race/ethnicity groups.

In both Manatee County and the region, the occurrence of severe housing cost burden is greatest in non-family households. Large households (5 or more people) have greater percentages of severe cost burden than small households (less than 5 people).

Based on the data provided in **Table 7**, disproportionate severe housing cost burden may exist for households in all minority race/ethnicity groups, with the exception of Asian or Pacific Islander households. Non-family and large households (5 or more people) are more cost burdened than small households (less than 5 people).

**Table 7: Demographics of Households with Severe Housing Cost Burden**

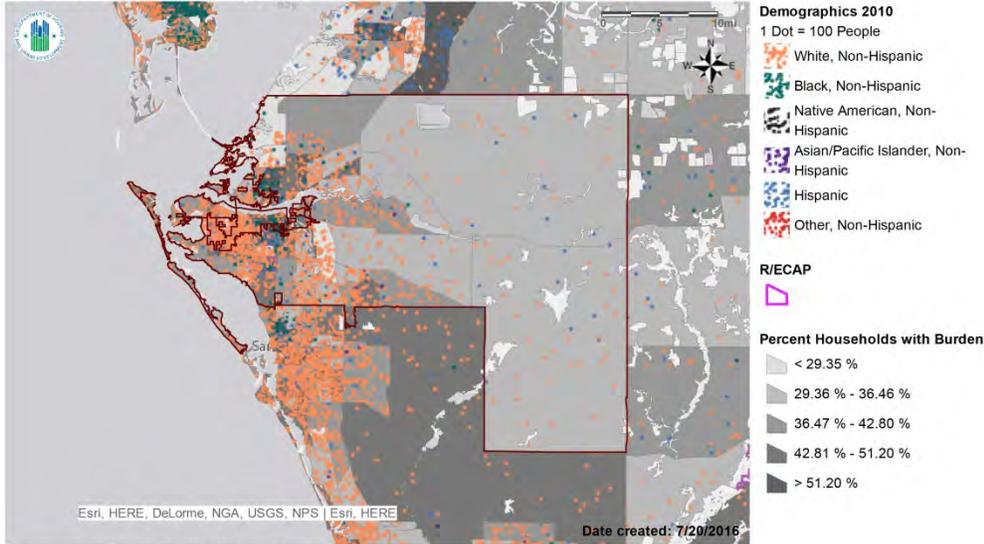
Households with Severe Housing Cost Burden*	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction			(North Port-Sarasota-Bradenton, FL CBSA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
<b>Race/Ethnicity</b>						
White, Non-Hispanic	13,530	87,520	15.46%	44,610	259,680	17.18%
Black, Non-Hispanic	1,685	5,846	28.82%	4,640	14,770	31.42%
Hispanic	2,900	9,332	31.08%	5,875	20,345	28.88%
Asian or Pacific Islander, Non-Hispanic	300	1,553	19.32%	660	3,238	20.38%
Native American, Non-Hispanic	45	140	32.14%	115	445	25.84%
Other, Non-Hispanic	250	787	31.77%	635	2,185	29.06%
<i>Total</i>	<i>18,710</i>	<i>105,180</i>	<i>17.79%</i>	<i>56,535</i>	<i>300,690</i>	<i>18.80%</i>
<b>Household Type and Size</b>						
Family households, <5 people	9,300	63,107	14.74%	25,039	170,725	14.67%
Family households, 5+ people	1,233	6,814	18.10%	2,940	16,025	18.35%
Non-family households	8,145	35,278	23.09%	28,539	113,920	25.05%
Note 1: Severe housing cost burden is defined as greater than 50% of income. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems. Note 4: Data Sources: CHAS Note 5: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).						

***Areas Experiencing the Greatest Housing Burden***

The distribution of housing burden (i.e., having one or more housing burdens) is shown in **Maps 27-28**. In Manatee County, the percentage of households with housing burden appears higher in areas of greater segregation by race/ethnicity such as the three (3) R/ECAP areas southeast of Bradenton, where more than 50% of households are burdened, and in portions of east Bradenton and east Palmetto along US 301. These areas are characterized by a larger percentage of Black and Hispanic populations than other areas of the County. In terms of national origin, the percentage of households with housing burden is also higher in areas of national origin segregation, particularly the County’s southern R/ECAP area where there is a concentration of persons from Mexico, and in other areas south of Bradenton where concentrations of persons from Haiti and Cuba may reside.

Figure 27: Housing Burden by Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 7 - Housing Burden and Race/Ethnicity

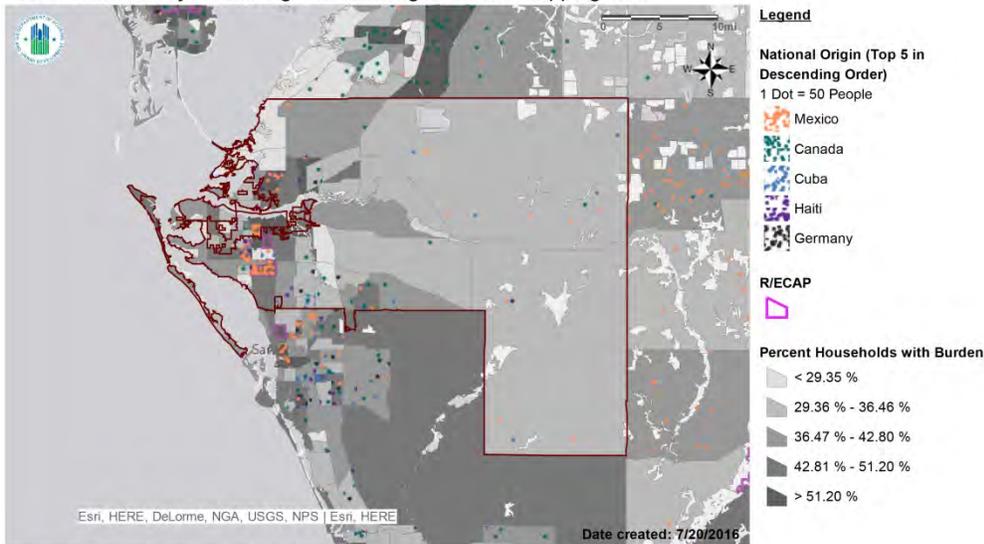
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

Figure 28: Housing Burden by National Origin

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 8 - Housing Burden and National Origin

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

Needs of Families and Available Housing Stock

In both Manatee County and the region, the occurrence of cost burden is greatest in non-family households and larger households (5 or more people). According to data accessed from HUD CPD Maps, areas having a higher percentage of renter-occupied housing units that are large (3 or more bedroom) include the County’s three (3) R/ECAP census tracts, areas near I-75 at the SR 64 and SR 70 interchanges, and some areas near US 301 south of Bradenton. Other areas having a higher percentage of renter-occupied housing units that are large (3 or more bedroom) include the Bayshore Gardens and Whitfield areas south of 63<sup>rd</sup> Ave. West, the Palmetto area north of 33<sup>rd</sup> St. West, and the Parrish area south of Old Tampa Rd. and Gold Course Rd. The majority of Manatee County’s jurisdiction has a higher percentage of owner-occupied housing units that are large (3 or more bedroom). This is particularly true for most of the area east of I-75 at Lakewood Ranch as well as the area between the Braden River and I-75, the area just northeast of Palmetto, and some areas near U.S 301 south of Bradenton. This data indicates that large owner-occupied housing units are more available, but large renter-occupied housing units are less available.

**Table 8** shows publicly supported housing units by number of bedrooms and number of households with children in Manatee County. Over half (61%) of public housing units are 2-bedroom units, 14% are 1-bedroom units, and 23% are 3-bedroom units. Approximately 84% of public housing units have two, three, or more bedrooms which appears adequate to address the 68% of households with children needing public housing.

All (100%) of project-based Section 8 units are 1-bedroom units; however, there are no households with children needing project-based Section 8 units. Similarly, all (100%) of the Other Multifamily units are 1-bedroom units and there are no households with children needing Other Multifamily units.

More than half (52%) of Housing Choice Voucher (HCV) units are 3-bedroom units, 10% are 1-bedroom units, and 32% are 2-bedroom units. Approximately 84% of HCV units have two, three, or more bedrooms which appears adequate to address the 59% of households with children needing HCV units.

**Table 8: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Households with Children**

Housing Type	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	10	13.51%	45	60.81%	17	22.97%	50	67.57%
Project-Based Section 8	155	100.00%	0	0.00%	0	0.00%	0	0.00%
Other Multifamily	71	100.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	100	10.33%	308	31.82%	506	52.27%	571	58.99%

Note 1: Data Sources: APSH  
 Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Occupancy Tenure and Housing Burden

According to data accessed from HUD CPD Maps, the majority of the County’s housing units are owner-occupied; however, renter-occupied units are dispersed through the County. Areas where more than 50% of the housing units are renter-occupied include East Bradenton, South Bradenton, West Samoset, and east Palmetto, as well as the County’s north R/ECAP area and portions of the south R/ECAP area. The highest concentrations of owner-occupied housing units are located either east of I-75 or toward the barrier islands.

When these areas are compared to the percentage of households with housing burden, areas with higher percentages of renter-occupied units generally have higher percentages of households with housing burden. In general, the distribution of households with housing burden indicates a need for renter-occupied housing rehabilitation or more affordable rental housing options.

In regard to race/ethnicity group and national origin, areas of greater segregation are characterized by a higher percentage of renter-occupied units; however, owner-occupied housing still accounts for at least half of the housing units in these areas. Given the data on disproportionate housing needs, these areas may require more multi-faceted housing rehabilitation and affordable housing options.

In terms of opportunities for homeownership, the following tables show data required by the Home Mortgage Disclosure Act (HMDA) for the year 2015. The data show mortgage applications and originations by income level, race/ethnicity, and R/ECAP Census Tract (see **Tables 9-11**). The data indicate disparities in the percentage of loan originations, particularly within R/ECAP Census Tracts.

**Table 9: Mortgage Applications and Originations by Income Level**

Income of Applicants	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
<50% AMI	450	50,898	277	30,665	61.6%	632	57,114	355	30,231	56.2%
50% AMI - 79% AMI	1,313	202,679	893	136,846	68.0%	1,723	205,390	1,170	140,578	67.9%
80% AMI - 99% AMI	909	173,542	668	127,561	73.5%	1,376	209,450	967	149,019	70.3%
100% AMI - 119% AMI	656	139,822	491	104,993	74.8%	1,158	204,811	858	152,337	74.1%
>120% AMI	1,630	425,733	1,192	309,955	73.1%	9,087	2,784,795	6,644	2,010,224	73.1%
Income Not Available	32	5,173	11	1,764	34.4%	272	122,373	162	81,131	59.6%

Source: HMDA Aggregate Table 4-1 and 4-2 (2015)

**MANATEE COUNTY 2017-2021 ASSESSMENT OF FAIR HOUSING**

**Table 10: Mortgage Applications and Originations by Race**

Race	FHA, FSA/RHS, and VA					Conventional				
	Applications Received		Loans Originated		Percent Originated	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's		Number	\$000's	Number	\$000's	
<b>American Indian/Alaska Native (Total)</b>	<b>14</b>	<b>2,762</b>	<b>10</b>	<b>2,055</b>	<b>71.4%</b>	<b>22</b>	<b>3,164</b>	<b>14</b>	<b>2,504</b>	<b>63.6%</b>
Male	3	527	2	375	66.7%	14	2,336	9	1,830	64.3%
Female	6	1,260	4	869	66.7%	8	828	5	674	62.5%
Joint (Male/Female)	4	808	3	644	75.0%	-	-	-	-	-
<b>Asian (Total)</b>	<b>43</b>	<b>8,220</b>	<b>28</b>	<b>5,481</b>	<b>65.1%</b>	<b>223</b>	<b>54,538</b>	<b>141</b>	<b>34,768</b>	<b>63.2%</b>
Male	21	4,414	12	2,633	57.1%	85	21,152	53	13,506	62.4%
Female	13	2,152	8	1,357	61.5%	51	9,005	31	5,397	60.8%
Joint (Male/Female)	9	1,654	8	1,491	88.9%	86	24,253	56	15,737	65.1%
<b>Black or African American (Total)</b>	<b>197</b>	<b>37,214</b>	<b>118</b>	<b>22,805</b>	<b>59.9%</b>	<b>165</b>	<b>38,760</b>	<b>106</b>	<b>28,127</b>	<b>64.2%</b>
Male	93	17,318	59	11,363	63.4%	53	16,685	27	11,123	50.9%
Female	69	12,195	36	6,577	52.2%	64	9,408	44	7,004	68.8%
Joint (Male/Female)	35	7,701	23	4,865	65.7%	41	10,749	29	8,184	70.7%
<b>Native Hawaiian/Other Pacific Islander (Total)</b>	<b>7</b>	<b>1,233</b>	<b>4</b>	<b>640</b>	<b>57.1%</b>	<b>16</b>	<b>3,724</b>	<b>11</b>	<b>2,322</b>	<b>68.8%</b>
Male	5	869	2	276	40.0%	8	1,400	5	1,008	62.5%
Female	1	163	1	163	100.0%	6	1,249	5	1,089	83.3%
Joint (Male/Female)	1	201	1	201	100.0%	2	1,075	1	225	50.0%
<b>White (Total)</b>	<b>4,219</b>	<b>839,831</b>	<b>3,035</b>	<b>608,744</b>	<b>71.9%</b>	<b>12,161</b>	<b>2,995,536</b>	<b>8,810</b>	<b>2,175,571</b>	<b>72.4%</b>
Male	1,654	312,462	1,138	218,849	68.8%	3,352	835,190	2,341	582,824	69.8%
Female	968	165,643	695	119,947	71.8%	2,617	492,621	1,873	352,056	71.6%
Joint (Male/Female)	1,591	360,743	1,198	269,269	75.3%	6,173	1,663,780	4,584	1,237,716	74.3%
<b>2 or More Minority Races</b>	<b>4</b>	<b>674</b>	<b>2</b>	<b>294</b>	<b>50.0%</b>	<b>2</b>	<b>320</b>	<b>1</b>	<b>211</b>	<b>50.0%</b>
Male	3	603	1	223	33.3%	-	-	-	-	-
Female	1	71	1	71	100.0%	1	211	1	211	100.0%
Joint (Male/Female)	-	-	-	-	-	1	109	-	-	-
<b>Joint (White/Minority Race Total)</b>	<b>79</b>	<b>18,285</b>	<b>55</b>	<b>12,966</b>	<b>69.6%</b>	<b>176</b>	<b>44,689</b>	<b>126</b>	<b>30,344</b>	<b>71.6%</b>
Male	1	289	1	289	100.0%	2	409	1	309	50.0%
Female	1	178	1	178	100.0%	3	356	3	356	100.0%
Joint (Male/Female)	76	17,568	52	12,249	68.4%	170	43,604	122	29,679	71.8%
<b>Hispanic or Latino (Total)</b>	<b>544</b>	<b>87,534</b>	<b>368</b>	<b>60,232</b>	<b>67.6%</b>	<b>525</b>	<b>92,233</b>	<b>337</b>	<b>58,264</b>	<b>64.2%</b>
Male	276	44,511	174	28,552	63.0%	244	45,867	156	28,510	63.9%
Female	150	20,596	107	14,985	71.3%	150	22,491	96	15,073	64.0%
Joint (Male/Female)	116	21,995	85	16,263	73.3%	131	23,875	85	14,681	64.9%
<b>Race Not Available</b>	<b>427</b>	<b>89,628</b>	<b>280</b>	<b>58,799</b>	<b>65.6%</b>	<b>1,483</b>	<b>443,202</b>	<b>947</b>	<b>289,673</b>	<b>63.9%</b>
Male	87	17,905	57	11,545	65.5%	193	54,641	121	33,867	62.7%
Female	46	8,231	35	6,316	76.1%	135	28,619	97	19,317	71.9%
Joint (Male/Female)	73	15,826	45	9,458	61.6%	310	87,014	191	52,225	61.6%

Source: HMDA Aggregate Table 4-1 and 4-2 (2015)

**Table 11: Mortgage Applications and Originations by R/ECAP Census Tract**

R/ECAP Census Tract	Home Purchase Loans	
	FHA, FSA/RHS & VA	Conventional
<b>1.06</b>		
<i>Percent Originated</i>	36%	38%
Loans Originated	4	3
Apps Approved, Not Accepted	-	-
Apps Denied	3	1
Apps Withdrawn	2	3
Files Closed for Incompleteness	2	1
<b>TOTAL</b>	<b>11</b>	<b>8</b>
<b>3.05</b>		
<i>Percent Originated</i>	67%	11%
Loans Originated	4	1
Apps Approved, Not Accepted	1	1
Apps Denied	1	4
Apps Withdrawn	-	2
Files Closed for Incompleteness	-	1
<b>TOTAL</b>	<b>6</b>	<b>9</b>
<b>3.06</b>		
<i>Percent Originated</i>	33%	73%
Loans Originated	2	8
Apps Approved, Not Accepted	1	
Apps Denied	3	1
Apps Withdrawn	-	1
Files Closed for Incompleteness	-	1
<b>TOTAL</b>	<b>6</b>	<b>11</b>

Source: HMDA Aggregate Table 1: Disposition of Loan Applications, by Location of Property and Type of Loan, 2015

*Contributing Factors of Disproportionate Housing Needs*

Contributing factors include limited locations, quality, and types of affordable housing. The amount of affordable housing within Manatee County is an issue that was identified through the public participation process and the collection and analysis of housing data indicates that affordable housing is lacking especially for lower income households. Moreover, the quality of housing available for lower income households is poor, particularly rental housing, and further inspection and code enforcement is needed.

### 5.3 Publicly Supported Housing Analysis

According to the decennial census and data collected from the AFFH Data and Mapping Tool, Manatee County had 141,631 housing units at the time of the 2010 decennial census. Of these, less than 1% of units were public housing (0.06%), project-based Section 8 (0.19%), or “other” publicly supported multifamily units (0.06%). Less than 1% (0.77%) were Housing Choice Voucher (HCV) program units. See **Table 12**.

**Table 12: Publicly Supported Housing Units by Program Category**

	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction	
Housing Units	#	%
Total housing units	141,631	-
Public Housing	80	0.06%
Project-based Section 8	272	0.19%
Other Multifamily	78	0.06%
HCV Program	1,090	0.77%

Note 1: Data Sources: Decennial Census; APSH  
 Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

#### 5.3.1 Publicly Supported Housing Demographics

##### Racial/Ethnic Groups Residing in Publicly Supported Housing

**Table 13** summarizes the race/ethnicity of households residing in publicly supported housing within Manatee County. By far, the majority of households living in public housing are Black (51%). Approximately 19% of households living in public housing are White. Approximately 30% of households living in public housing are Hispanic. No households in the Asian or Pacific Islander race/ethnicity group are living in public housing.

In terms of the project-based Section 8 programs, the majority of households utilizing project-based Section 8 assistance are White (63%). Approximately 24% of households utilizing project-based Section 8 assistance are Black and 12% of households utilizing project-based Section 8 assistance are Hispanic. No households in the Asian or Pacific Islander race/ethnicity group are utilizing project-based Section 8 assistance.

In terms of “other” publicly supported multifamily housing, nearly all (97%) of households are White. Just over 1% of households reside in “other” publicly supported multifamily units are Black and just over 1% of households reside in “other” publicly supported multifamily units are Asian or Pacific Islander. No households in the Hispanic race/ethnicity group reside in “other” publicly supported multifamily units.

Of the households using Housing Choice Vouchers (HCVs), the majority (64%) are Black. Approximately 23% of households using HCVs are White, and less than 13% are Hispanic. No households in the Asian or Pacific Islander race/ethnicity group use HCVs.

Given the information provided on publicly supported housing residents by race/ethnicity, it is apparent that White and Black households utilize publicly supported housing at a disproportionate level when compared to other race/ethnicity groups. For all types of publicly supported housing, White households represent approximately one-third (32%) of the residents and Black households represent approximately one-half (55%) of the residents.

Comparison to the Population in General

When income level (Area Median Income) is considered, the percentage of households at or below 30% AMI is approximately 75% White, approximately 10% Black, and approximately 12% Hispanic. Asian or Pacific Islander households represent just 1% of households at or below 30% AMI. This pattern is nearly the same for households at or below 50% of AMI and at or below 80% of AMI for Black and Hispanic households; however, the percentage of White households differs as AMI increases. Although a higher percentage of Black households reside in publicly supported housing, a higher percentage of low-to-moderate income households in Manatee County are White.

Of the total number of households in Manatee County, 66% of White households are low-and-moderate income, 9% of Black households are low-and-moderate income, and 14% of Hispanic households are low-and-moderate income. Considering countywide percentages of households by race/ethnicity, no particular race/ethnicity has a disproportionate need for publicly supported housing when compared to the jurisdiction as a whole; however, there is a higher percentage of Black households of low-to-moderate income than Black households of any income.

**Table 13: Publicly Supported Housing Residents by Race/Ethnicity**

(Manatee County, FL CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
<b>Housing Type</b>								
Public Housing	14	19.18%	37	50.68%	22	30.14%	0	0.00%
Project-Based Section 8	93	62.84%	36	24.32%	18	12.16%	0	0.00%
Other Multifamily	67	97.10%	1	1.45%	0	0.00%	1	1.45%
HCV Program	211	23.26%	584	64.39%	112	12.35%	0	0.00%
<b>0-30% of AMI</b>	8,617	74.63%	1,134	9.82%	1,525	13.21%	124	1.07%
<b>0-50% of AMI</b>	13,759	56.97%	2,315	9.58%	3,530	14.62%	254	1.05%
<b>0-80% of AMI</b>	28,038	65.93%	3,783	8.90%	5,805	13.65%	449	1.06%
<b>HOME, ESG) Jurisdiction</b>	197,249	75.99%	17,955	6.92%	35,511	13.68%	4,747	1.83%

Note 1: Data Sources: Decennial Census; APSH; CHAS  
 Note 2: #s presented are numbers of households not individuals.  
 Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### 5.3.2 Publicly Supported Housing Location and Occupancy

#### Location of Publicly Supported Housing

**Figures 29-30** show the locations of publicly supported housing in Manatee County. **Figure 29** is limited to public housing, project-based Section 8, low-income housing tax credit (LIHTC), and other multifamily assistance; whereas **Figure 30** shows the percentage of HCVs. As shown in **Figure 29**, the current supply of public housing is distributed throughout urban Manatee County, with nearly all publicly supported housing located west of I-75.

Public housing is limited to the Bradenton area, with only one public housing development (Pine Village) located in unincorporated Manatee County. Only one publicly supported housing facility (Presbyterian Villas of Bradenton/Project-Based Section 8) is within the County's southern R/ECAP area; however, Manatee County VOA Living Center, which is another multifamily assisted development, is located near that R/ECAP area. Additionally, several LIHTC developments are located near both the northern and southern R/ECAP areas.

The locations of publicly supported housing generally correspond to areas of potential segregation in east Bradenton and Palmetto, but also to more integrated low-income areas in Manatee County south of Bradenton (e.g. south of Cortez Rd West and north of 57<sup>th</sup> Ave. West).

In terms of Housing Choice Vouchers (HCVs), areas of higher HCV utilization correspond to the entire US 301 corridor through Manatee County, as well as the County's three (3) R/ECAP census tracts. Additionally, areas of higher HCV utilization also include the area south of Cortez Rd. West and north of 53<sup>rd</sup> Ave. West, the area northeast of Ellenton, and the area west of Caruso Rd./57<sup>th</sup> St. E. The highest percentages of HCV utilization in Manatee County are in northeast Palmetto, the neighborhoods between 14<sup>th</sup> St. West and US 301, and the Samoset/Oneco area north of 53<sup>rd</sup> Ave. East.

Figure 29: Publicly Supported Housing by Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

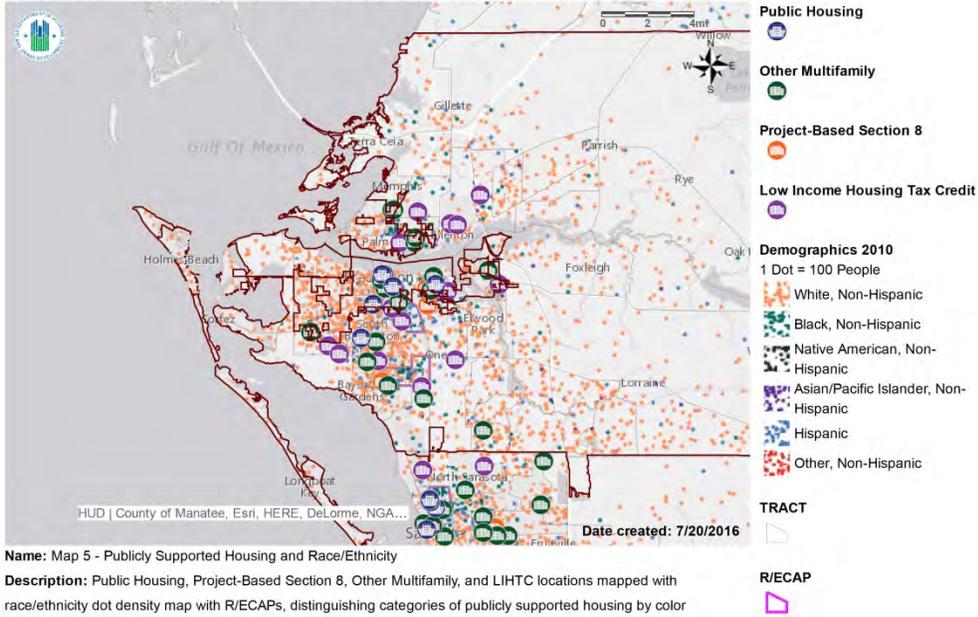
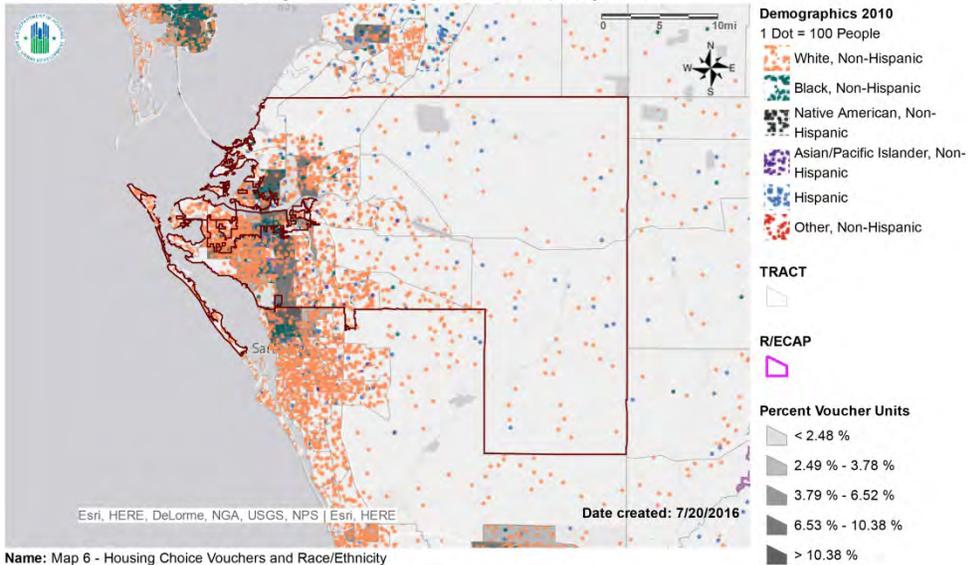


Figure 30: Housing Choice Vouchers by Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Occupancy of Public Housing in R/ECAPs

R/ECAP data for Manatee County is shown in **Table 14**. As shown, data for public housing and the project-based Section 8 program are only available for non-R/ECAP tracts. Within the non-R/ECAP tracts, 8% of public housing residents are elderly, 12% are disabled, and 68% are families with children. In the project-based Section 8 program, 71% are elderly, 31% are disabled, and none are families with children.

Within R/ECAP tracts, all (100%) residents in “other” publicly supported multifamily units are elderly; however, only 3% are disabled. Within non-R/ECAP tracts, only 9% of residents in “other” publicly supported multifamily units are elderly; whereas, 78% are disabled. Regardless of R/ECAP status, none of the residents in “other” publicly supported multifamily units are families with children.

Within R/ECAP tracts, 19% of HCV program residents are elderly, 15% are disabled, and 62% are families with children. Within non-R/ECAP tracts, 13% of HCV program residents are elderly, 13% are disabled, and 59% are families with children.

Based on the provided data, families with children are most supported by public housing and the HCV program; whereas the elderly and disabled are most supported by project-based Section 8 and “other” publicly supported multifamily housing. A significantly higher percentage of elderly live in “other” publicly supported multifamily within R/ECAP tracts than within non-R/ECAP tracts; whereas the converse is true for the disabled. With regard to the HCV program, the differences in occupancy demographics between R/ECAP and non-R/ECAP tracts are less significant.

**Table 14: R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category**

(Manatee County, FL CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
<b>Public Housing</b>								
R/ECAP tracts								
Non R/ECAP tracts	75	8.11%	12.16%	19.18%	50.68%	30.14%	0.00%	67.57%
<b>Project-based Section 8</b>								
R/ECAP tracts	210							
Non R/ECAP tracts	58	70.97%	30.65%	36.21%	53.45%	8.62%	0.00%	0.00%
<b>Other HUD Multifamily</b>								
R/ECAP tracts	38	100.00%	2.56%	94.59%	2.70%	0.00%		0.00%
Non R/ECAP tracts	38	9.38%	78.13%	100.00%	0.00%	0.00%	0.00%	0.00%
<b>HCV Program</b>								
R/ECAP tracts	154	18.54%	14.57%	22.60%	65.75%	11.64%	0.00%	62.25%
Non R/ECAP tracts	815	12.48%	13.22%	23.02%	64.02%	12.96%	0.00%	58.63%

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

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

Publicly Supported Housing Developments

**Table 15** shows publicly supported housing developments located in Manatee County. These developments either provide public housing or support project-based Section 8 assistance and other HUD multifamily assisted housing. Manatee County has one primary public housing development, “Pine Village”, which provides 80 units, 51% of which are occupied by Black residents. Sixty-eight percent (68%) of Pine Village’s households are families with children. No residents or families are housed in other scattered sites.

For project-based Section 8 assistance, residents are housed in three (3) developments supporting 272 units. The majority of residents receiving Section 8 assistance at “Lake East I and II” are Black; however, “Presbyterian Villas of Bradenton” has a majority White residency. None of the project-based Section 8 assisted developments support families with children.

In addition to public housing and project-based Section 8 assistance, there are four (4) other HUD multifamily assisted housing developments in Manatee County, three (3) of which are operated by Volunteers of America (VOA). These developments support 78 units and have a majority White residency. None of the other HUD multifamily assisted developments support families with children.

**Table 15: Publicly Supported Housing Developments by Program Category**

Public Housing (Manatee County, FL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Pine Village	80	19%	51%	30%	0%	68%
Project-Based Section 8 (Manatee County, FL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Lake East I	40	39%	51%	10%	0%	0%
Lake East II	22	30%	52%	9%	0%	0%
Presbyterian Villas Of Bradenton	210	78%	6%	15%	0%	0%
Other HUD Multifamily Assisted Housing (Manatee County, FL CDBG) Jurisdiction						
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
The Woods At Central College	40	90%	5%	0%	5%	0%
Holiday Heights Voa Living Center	18	100%	0%	0%	0%	0%
Manatee County Voa Living Center	11					
Bradenton Voa Living Center	9					
Note 1: For LIHTC properties, this information will be supplied by local knowledge.						
Note 2: Percentages may not add to 100 due to rounding error.						
Note 3: Data Sources: APSH						
Note 4: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).						

**5.3.4 Disparities in Access to Opportunity**

Given the information provided on publicly supported housing residents by race/ethnicity, it is apparent that White and Black households utilize publicly supported housing at a disproportionate level when compared to other race/ethnicity groups. Considering countywide percentages of households by

race/ethnicity, no particular race/ethnicity has a disproportionate need for publicly supported housing when compared to the jurisdiction as a whole; however, there is a higher percentage of Black households of low-to-moderate income than Black households of any income.

In unincorporated Manatee County, access to public housing is limited and distant from areas with housing needs. Project-based Section 8 opportunities are also limited in Manatee County, although more proximate to R/ECAP areas. Housing Choice Vouchers (HCVs) do appear to be utilized in areas with corresponding housing needs, particularly in the areas along US 301 northeast of Palmetto and southwest of Bradenton. The areas where HCVs are most utilized also correspond to areas of low-and-moderate income and racial/ethnic integration.

### ***5.3.5 Contributing Factors of Publicly Supporting Housing***

Contributing factors include limited locations, quality, and types of publicly assisted housing. In general, the quality of housing available for lower income households in Manatee County is poor, particularly rental housing, and further inspection and code enforcement is needed.

## **5.4 Disability and Access Analysis**

While individuals with disabilities may experience the same fair housing issues as individuals without disabilities, they also may experience additional disability-related barriers that are distinct from the barriers experienced by individuals without disabilities. For example, some individuals with disabilities may need specific accessibility features or additional services in housing, transportation, education, and other programs or facilities in order to have an equal opportunity.

Under Federal law, the term “disability” means:

- A physical or mental impairment that substantially limits one or more major life activities of such individual;
- A record of such an impairment; or
- Being regarded as having such impairment.

The following section provides an analysis of disability and access to housing.

### ***5.4.1 Population with Disabilities Profile***

#### ***Disabilities by Type***

**Table 16** shows disabilities by type in Manatee County and the North Port-Sarasota-Bradenton region. The three most prevalent disability types in Manatee County are ambulatory difficulty (7.40%), hearing difficulty (5.00%), and independent living difficulty (4.66%). Other disability types represented include cognitive difficulty (4.64%), self-care difficulty (2.43%), and vision difficulty (2.24%). When compared to

the greater North Port-Sarasota-Bradenton region, Manatee County has a lower percentage of persons with a disability of all types.

**Table 16: Disability by Type**

Disability Type	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction		(North Port-Sarasota-Bradenton, FL CBSA) Region	
	#	%	#	%
Hearing difficulty	12,506	5.00%	36,449	5.42%
Vision difficulty	5,609	2.24%	15,366	2.28%
Cognitive difficulty	11,596	4.64%	31,992	4.75%
Ambulatory difficulty	18,519	7.40%	55,125	8.19%
Self-care difficulty	6,075	2.43%	17,544	2.61%
Independent living difficulty	11,660	4.66%	34,282	5.09%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

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

Geographic Patterns of Disability

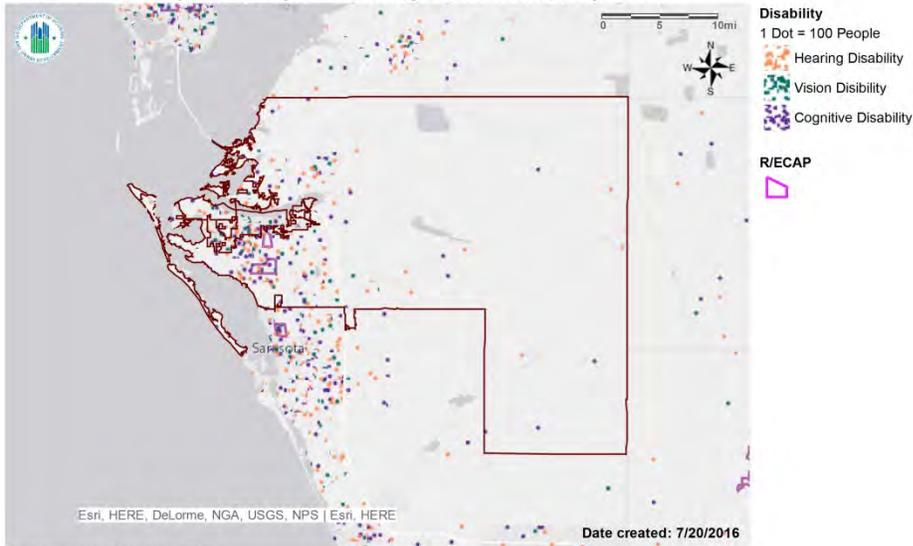
In terms of location of disability by type, there is no apparent segregation by disability type in Manatee County. Where population density increases, so too does disability occurrence.

Persons with hearing, vision, or cognitive disabilities appear integrated in more developed areas of the County, particularly south of Bradenton. When the three (3) R/ECAP census tracts are compared, the southern R/ECAP census tract has a higher concentration of persons with hearing, vision, or cognitive disabilities than the northern R/ECAP census tract.

Persons with ambulatory, self-care, or independent living disabilities also appear integrated in more developed areas of the County. When compared, the southern R/ECAP census tract (located south of 53<sup>rd</sup> Ave. East) appears to contain a disproportionate share of persons with an ambulatory disability, though this share is no greater than the surrounding area. See **Figures 31-32**.

Figure 31: Disability by Type – Hearing, Vision, or Cognitive

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 16 - Disability by Type

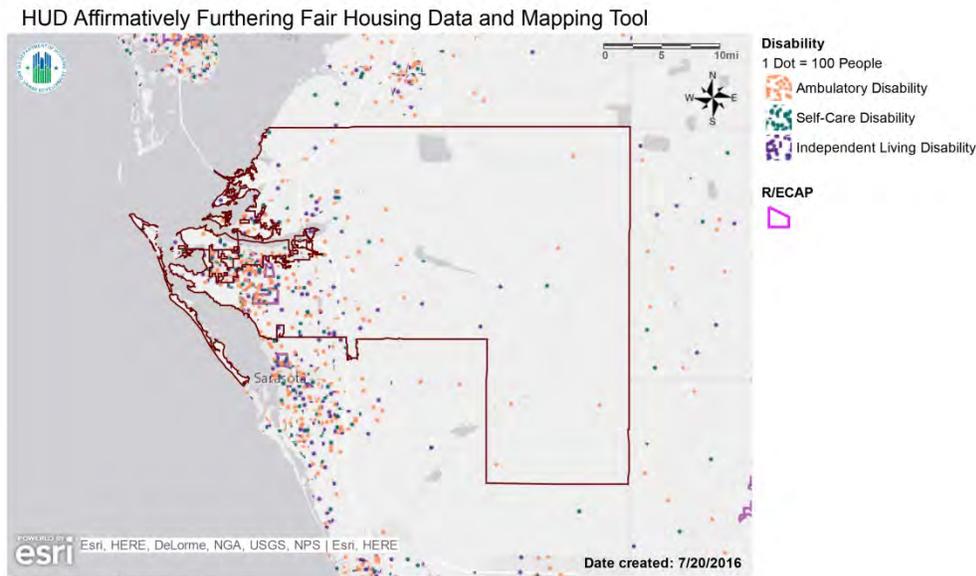
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Manatee County (CDBG, HOME, ESG)

Region: North Port-Sarasota-Bradenton, FL

DRAFT

**Figure 32: Disability by Type – Ambulatory, Self-Care, or Independent Living**



**Name:** Map 16 - Disability by Type  
**Description:** Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region  
**Jurisdiction:** Manatee County (CDBG, HOME, ESG)  
**Region:** North Port-Sarasota-Bradenton, FL

**Table 17** shows disabilities by age group in Manatee County and the North Port-Sarasota-Bradenton region. The greatest percentage of persons with a disability appears in the 65 plus age group (7.35%). The lowest percentage of persons with a disability appears in the 5-17 age group (0.84%). Approximately 6% of persons in the 18-64 age group have a disability. These percentages are consistent with the North Port-Sarasota-Bradenton region; however, Manatee County has a slightly greater percentage of persons with a disability in the 65 plus age group.

**Table 17: Disability by Age Group**

Age of People with Disabilities	(Manatee County, FL CDBG, HOME, ESG) Jurisdiction		(North Port-Sarasota-Bradenton, FL CBSA) Region	
	#	%	#	%
age 5-17 with Disabilities	2,105	0.84%	5,210	0.77%
age 18-64 with Disabilities	14,265	5.70%	38,379	5.70%
age 65+ with Disabilities	18,375	7.35%	57,340	8.52%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

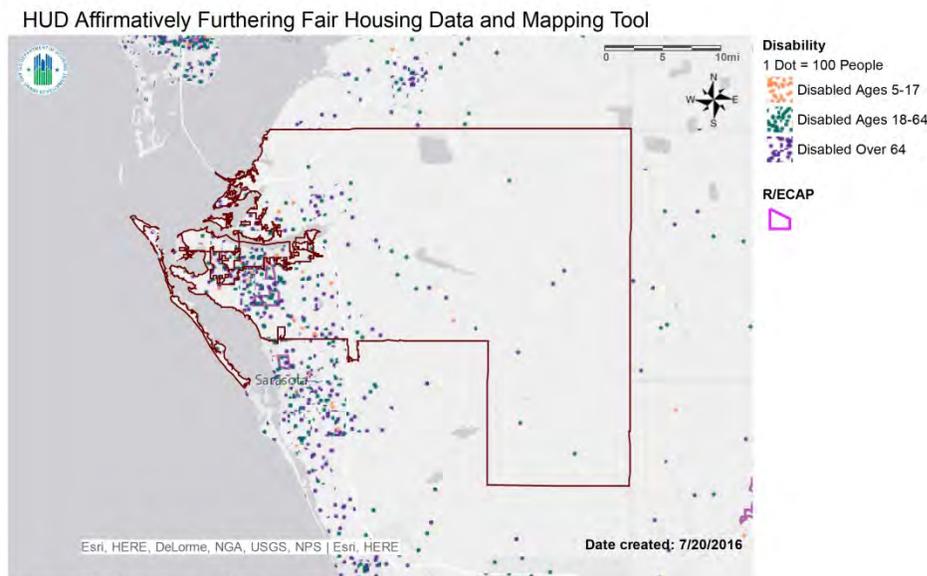
Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

In terms of location of disability age group, older persons (age 65+) with disabilities reside throughout the County, with greater concentrations on a neighborhood-by-neighborhood level south of Bradenton, northeast of Ellenton, and south of SR 70 between Lockwood Ridge and I-75. Adults, age 18-64, with

disabilities reside throughout the jurisdiction, but are most concentrated in the densely populated neighborhoods south of Bradenton. Children, ages 5-17, with disabilities also reside throughout the jurisdiction, but are most concentrated in east Bradenton, the three (3) R/ECAP census tracts, the area north of Palmetto (i.e., north of 33<sup>rd</sup> St. West and west of US 41), and the area just south of Palm Aire Golf & Country Club (i.e., north of University Parkway between Lockwood Ridge Rd. and Whitfield Ave.).

When compared to surrounding areas, the three (3) R/ECAP census tracts do not contain a disproportionate share of elderly or adult persons with a disability; however, they do contain a disproportionate share of children with a disability. See **Figure 33**.

**Figure 33: Disability by Age Group**



**Name:** Map 17 - Disability by Age Group  
**Description:** All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs  
**Jurisdiction:** Manatee County (CDBG, HOME, ESG)  
**Region:** North Port-Sarasota-Bradenton, FL

### 5.4.2 Housing Accessibility

#### Supply of Accessible Housing

There is limited disability-related data available, including data relating to the supply of accessible housing. While single-family housing is generally not accessible to persons with disabilities unless constructed or retrofitted for a disabled occupant, the Fair Housing Act does require that most multifamily housing built after 1991 meet federal accessibility standards. In contrast, older multifamily housing built prior to 1991 is typically not accessible, unless retrofitted. Additionally, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments.

Location of Accessible Housing

Based on the distribution of persons with a disability, accessible housing is available throughout the County; however, Manatee County has a significant share of ageing housing stock, particularly in the County’s urban core near the City of Bradenton and along the U.S. 301 and U.S. 41 corridors and within R/ECAPs. Given input received during the public participation process, older rental housing in Manatee County is lacking adequate code enforcement including, but not limited to, inspections for compliance with federal accessibility standards.

Access to Publicly Supported Housing

Of the four publicly supported housing types represented in Manatee County, “other multifamily” housing supports the highest percentage of persons with a disability (36.62%). Public housing supports the lowest percentage of persons with a disability (12.16%). When compared to the North Port-Sarasota-Bradenton region, a smaller percentage (13.31%) is supported by “other multifamily” housing; however, a greater percentage (20.21%) of persons with a disability is supported by public housing in the North Port-Sarasota-Bradenton region than in Manatee County.

**Table 18: Disability by Publicly Supported Housing Program Category**

(Manatee County, FL CDBG, HOME, ESG) Jurisdiction	People with a Disability*	
	#	%
Public Housing	9	12.16%
Project-Based Section 8	20	12.90%
Other Multifamily	26	36.62%
HCV Program	129	13.33%
<b>(North Port-Sarasota-Bradenton, FL CBSA) Region</b>		
Public Housing	137	20.21%
Project-Based Section 8	208	22.88%
Other Multifamily	78	13.31%
HCV Program	424	15.94%
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs. Note 2: Data Sources: ACS Note 3: Refer to the Data Documentation for details ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> ).		

**5.4.3 Integration of Persons with a Disability**

Extent of Segregation/Integration

Persons with a disability appear to be well-integrated with regard to type of disability, but less integrated with regard to disability by age group.

Housing Options for Persons with a Disability

Persons with a disability are more supported by “other multifamily” housing than public housing. Project-based Section 8 assistance and HCVs, which facilitate greater integration into the broader community, are less utilized by persons with a disability in Manatee County.

#### ***5.4.4 Disparities in Access to Opportunity***

##### ***Major Barriers to Access***

The major barriers faced by persons with a disability include housing affordability, accessibility, civil-rights-related housing discrimination in the private sector (e.g. advertising, applicant interviews, etc.), a dwindling supply of qualified caregivers, and housing availability. Other barriers may exist with regard to sidewalk provision, transportation availability, and other public services. Manatee County strives to comply with the Americans with Disabilities Act and to update public facilities accordingly.

##### ***Process to Request Reasonable Accommodations and Accessibility Modifications***

Requests for reasonable accommodations or accessibility modifications may be made through the County's ADA Coordinator within the Community Service Department's Human Services Division or through the Manatee County Housing Authority (MCHA). Reasonable accommodations are free of charge and must be requested from the respective County department at least 48 hours in advance of the programmed event or activity. Assistance with accessibility improvements may be funded through the County's CDBG program if certain eligibility criteria are met.

Manatee County also maintains a grievance procedure to resolve complaints alleging violation of the Americans with Disabilities Act with regard to public facilities and infrastructure. The ADA Coordinator investigates and responds to complaints of alleged disability discrimination pertaining to County services, activities, programs, or benefits. The County's ADA Coordinator will receive all such complaints up to 60 days after the alleged violation, review such complaints within 30 days of receipt, and respond to such complaints within 60 days of receipt.

Moreover, the Manatee County Fair Housing Ordinance serves to prohibit discrimination specific to housing based on disability status. Persons with a disability may make a formal complaint of housing discrimination directly to the County, to the U.S. Department of Housing and Urban Development (Atlanta HUD office), or to the Florida Commission on Human Relations as indicated in respective laws.

##### ***Barriers to Achieving Homeownership***

Persons with a disability may have difficulty in achieving homeownership because many programs designed to provide housing (e.g. public housing, Section 811, Section 8, HCVs, housing trust funds, etc.) to this population focus on the provision of rental housing rather than homeownership. Moreover, the housing stock of Manatee County consists of primarily single-family homes and many of the existing homes are aging and require rehabilitation and retrofit to provide the level of accessibility required for persons with a disability. This creates a barrier to homeownership unless housing rehabilitation programs exist. Additionally, persons with a disability are also likely to be living on a fixed income or be of low-and-moderate income and therefore may need down payment assistance or other financial support to achieve homeownership.

#### ***5.4.5 Disproportionate Housing Needs***

In terms of location of disability by type, there is no apparent segregation by disability type in Manatee County. Persons with hearing, vision, or cognitive disabilities appear integrated in more developed areas of the County. Persons with ambulatory, self-care, or independent living disabilities also appear

integrated in more developed areas of the County; however, ambulatory disabilities are more widespread.

Persons with disabilities reside throughout Manatee County. In terms of location of disability age group, older persons (age 65+), with disabilities are most concentrated south of Bradenton, northeast of Ellenton, and south of SR 70 between Lockwood Ridge and I-75. Adults, age 18-64, with disabilities are most concentrated in the densely populated neighborhoods south of Bradenton. Children, ages 5-17, with disabilities are most concentrated in east Bradenton, the three (3) R/ECAP census tracts, the area north of Palmetto (i.e., north of 33rd St. West and west of US 41), and the area just south of Palm Aire Golf & Country Club (i.e., north of University Parkway between Lockwood Ridge Rd. and Whitfield Ave.).

Currently, “other multifamily” is the most utilized type of publicly supported housing by persons with a disability. Public housing, Housing Choice Vouchers (HCVs), and project-based Section 8 assistance, are less utilized by persons with a disability. This may be due, in part, to a lack of accessible housing units in Manatee County. Lowered kitchen counters and appliances, widened doorways, modified bathrooms and showers, or other mobility devices are some of the features unique to accessible housing. Even basic accessibility features (such as an entrance with no steps or homes with no stairs and/or elevators) may be lacking in older housing developments.

#### ***5.4.6 Contributing Factors of Disability and Access***

Contributing factors include the lack of basic accessibility features (such as an entrance with no steps or homes with no stairs and/or elevators) in older housing developments and the lack of regular inspection and code enforcement of rental housing affordable to persons with a disability.

## 5.5 Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

### 5.5.1 Fair Housing Issues and Capacity

From October 1, 2011, through September 30, 2016, there were 28 fair housing complaints in Manatee County investigated by the Florida Commission on Human Relations (FCHR) and HUD. Most of these were in the Bradenton area. Of the 28 cases, eight had successful conciliation/settlements, two had complaints withdrawn after resolution, four involved complainants that failed to cooperate, 11 had no cause determination, one was dismissed for lack of jurisdiction, and one case remains open. Nineteen of these cases pertained to disability; however, national origin and familial status were the basis of some cases. Table 19, below, shows the distribution of cases by type in Manatee County.

**Table 19: Fair Housing Complaints by Type, 2011-2015**

Total Cases of Housing Discrimination Filed Under the Fair Housing Act (as Amended) Manatee County, Florida										
Year	Filed At	Total Cases	Race	National Origin	National Origin - Hispanic	Disability	Familial Status	Religion	Gender	Retaliation
2011	FHEO	4	0	1	1	3	0	0	0	0
2012	FHEO	7	0	1	1	5	0	0	0	1
2013	FHEO	8	1	0	0	5	2	0	0	0
2014	FHEO	5	0	2	1	3	0	0	0	0
2015	FHEO	4	0	0	0	3	1	0	0	0
<b>TOTAL</b>		<b>28</b>	<b>1</b>	<b>4</b>	<b>3</b>	<b>19</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>1</b>

Source: HUD Office of Fair Housing and Equal Opportunity (FHEO), cases thru 12/31/2015

### 5.5.2 State or Local Fair Housing Laws

A number of state and local fair housing laws pertain to Manatee County.

Similar to the Federal Fair Housing Act, the state of Florida maintains the Florida Fair Housing Act, which is summarized as follows:

#### Florida Fair Housing Act

Chapter 760, Part II, F.S. (the “Fair Housing Act”), provides protection against housing discrimination for a number of protected classes including race, color, religion, sex, national origin, handicap or familial status. This Act is enforced by the Florida Commission on Human Relations.

Additionally, the local government of Manatee County maintains the Manatee County Fair Housing Ordinance, as summarized below.

#### Manatee County Fair Housing Ordinance (1990)

The County’s Fair Housing Ordinance provides for the execution of the policies which prevent and eliminate discriminatory housing practices contained in Title VIII of the Federal Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. § 3601 et seq.), and Sections 760.20 through 760.37, F.S. (Florida Fair Housing Act). The Manatee County Fair Housing Ordinance secures fair housing law in the county, but is otherwise enforced by the U.S. Department of Housing and Urban Development (Atlanta HUD office) and Florida Commission on Human Relations through

respective laws. Manatee County adopted a new Fair Housing Ordinance in 2012 establishing County staff responsibilities for education, outreach, and complaint issues.

### ***5.5.3 Local and Regional Fair Housing Agencies and Organizations***

The primary agencies/organizations devoted to fair housing issues are the Manatee County Redevelopment and Economic Opportunity Department and the Florida Commission on Human Relations. Additionally, the Manatee County Housing Authority (MCHA) is a primary resource regarding fair housing options and opportunities within Manatee County, with the County providing referrals and direction if requested.

### ***5.5.4 Contributing Factors of Fair Housing Enforcement, Outreach Capacity, and Resources***

Contributing factors include lack of outreach and education materials available and the absence of a fair housing department or agency with a primary of focus on fair housing issues and outreach. Currently, there is no enforcement, investigation, or conciliation of the Manatee County Fair Housing Ordinance and it is unclear who the responsible Authority is for enforcing the ordinance. Presently, all complainants are referred to the HUD Atlanta office and the Florida Commission on Human Relations, and therefore are not monitored locally.

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## 6.0 Fair Housing Goals and Priorities

As a product of the Fair Housing Assessment process, the following eight (8) goals and priorities were developed to address Fair Housing in Manatee County (see **Table 20**). These goals and priorities were informed by the community participation process and input from service providers, Manatee County staff, Manatee County Housing Authority staff, and the Board of County Commissioners.

**Table 20: Fair Housing Goals and Priorities**

<b>Goal 1: Fair Housing Education</b>	
Contributing Factors	Lack of outreach and education materials available; absence of a fair housing department or agency with a primary of focus on fair housing issues and outreach
Fair Housing Issues	Lack of education on fair housing issues
Metrics & Milestones	<p>1.1 Provide every public housing recipient with education and outreach materials. (i.e., fair housing video display, complaint forms, brochures, website link, etc.) annually beginning October 1, 2017.</p> <p>1.2 Partner with a fair housing agency, lenders, and the real estate community to assist the County with fair housing testing, education, housing discrimination, and outreach with activities such as educational workshops and seminars by September 30, 2018.</p> <p>1.3 Explore the possibility of becoming a Fair Housing Initiative Program (FHIP) community by September 30, 2018.</p>
Timeframe for Achievement	2017-2021 (5 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (1.2 and 1.3 only); Manatee County Housing Authority (1.1 only)
Discussion	Through outreach and data collection uncertainty regarding a complaint procedure and “who to call” when faced with a housing discrimination issue was prevalent. In addition, educating landlords, lenders, and the real estate community were also identified as needs.
<b>Goal 2: Enforcement of Fair Housing Laws</b>	
Contributing Factors	Currently, there is no enforcement, investigation, or conciliation of the ordinance and it is unclear who the responsible Authority is for enforcing the ordinance. Presently, all complainants are referred to the Atlanta HUD office and the Florida Commission on Human Relations.
Fair Housing Issues	Lack of local enforcement of Fair Housing laws
Metrics & Milestones	<p>2.1 Research and coordinate with a Fair Housing Agency to have a more defined procedure/process and testing related to Fair Housing by September 30, 2019.</p> <p>2.2 Update Manatee County Fair Housing Ordinance No. 12-33 to become substantially equivalent to the Fair Housing Act by September 30, 2019.</p>

**MANATEE COUNTY 2017-2021 ASSESSMENT OF FAIR HOUSING**

Timeframe for Achievement	2017-2019 (3 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (2.1. and 2.2); Local Fair Housing Agency (2.1 only)
Discussion	Efforts have been made in past years to develop a Fair Housing Ordinance that is both enforceable and substantially equivalent to the Fair Housing Act. There is still work to be done to an ordinance that can be properly enforced at the local level.
<b>Goal 3: Financial Literacy and Access to Financing for Minority and Low-Income Populations</b>	
Contributing Factors	Lack of credit; lower incomes; lack of financial knowledge; derogatory credit; income-to-debt ratio; data show that persons of color have a higher rate of poverty within Manatee County; and lower level of educational attainment among Hispanic and African Americans.
Fair Housing Issues	<u>Financing Requirements.</u> More stringent financing requirements have emerged from lending institutions, such as the requirement for a credit score of 620 or higher, 3 lines of credit, and restrictive underwriting practices, resulting in the inability to obtain a mortgage. <u>Inadequate financial literacy education.</u> Without proper financial literacy education, residents may continue to make poor financial decisions. <u>Overall disparity of loan originations among racial groups.</u>
Metrics & Milestones	3.1 Partner with non-profit agencies in providing credit counseling, repair, and financial literacy/education by September 30, 2018.  3.2 Partner with lending agencies by September 30, 2019.
Timeframe for Achievement	2017-2019 (3 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (3.1 and 3.2); Non-Profit Housing Agencies (3.1 and 3.2); Lending Community (3.1 and 3.2)
Discussion	Lack of income, poor credit history, and lack of financial knowledge, debt-to-income ratio, and employment history are common causes of denial of loan applications. Services and education are needed for lower income persons related to financial literacy. According to poverty rates, minority populations are more likely to experience poverty.
<b>Goal 4: Access to Opportunity</b>	
Contributing Factors	Lower educational attainment among certain minority groups; lack of economic opportunity; and limited language proficiency.
Fair Housing Issues	Limited income is a major factor that prevents many residents from exercising their choice in housing. In Manatee County, African-American and Hispanic households display higher percentages of lower incomes than White households.
Metrics & Milestones	4.1 Assist 10 African-American and/or Hispanic persons with economic opportunity through County or non-profit programs (i.e., literacy

**MANATEE COUNTY 2017-2021 ASSESSMENT OF FAIR HOUSING**

	<p>education, job training, child care services, etc.) annually beginning October 1, 2018.</p> <p>4.2 Continued assistance of public housing residents through Family Self-Sufficiency Program (15 extremely low to very low income households) by September 30, 2019.</p>
Timeframe for Achievement	2017-2021 (5 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (4.1 only); Non-Profit Agencies (4.1 only); Manatee County Housing Authority (4.2 only)
Discussion	A common cause for poverty is the lack of access to opportunity, low educational attainment, and unemployment. Job training, child care services, and other services are needed to assist households with obtaining employment. According to poverty rates, minority populations are more likely to experience poverty.
<b>Goal 5: Affordable Housing</b>	
Contributing Factors	Limited locations, quality, and types of affordable housing
Fair Housing Issues	<u>Lack of affordable housing.</u> A shortage of affordable housing exists in Manatee County. While the County has funded some housing developments, these housing initiatives serve a small population of very low-, low-, and moderate-income families. An analysis of household income and cost burden factors for Manatee County suggest that affordable housing is very much needed.
Metrics & Milestones	<p>5.1 Partner with a non-profit or for-profit affordable housing developer to develop affordable housing by September 30, 2018.</p> <p>5.2 Review the County's Land Development Regulations and Comprehensive Plan to identify impediments to affordable housing and research alternative funding sources such as LIHTC, as well as other federal and state sources, to encourage affordable housing developments by September 30, 2019.</p> <p>5.3 To maintain a minimum REAC score of 95 on physical inspection component for public housing units and continue affordable rental units by September 30, 2019.</p>
Timeframe for Achievement	2017-2019 (3 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (5.1 and 5.2 only); Affordable Housing Developer (5.1 only); Manatee County Housing Authority (5.3 only)
Discussion	The amount of affordable housing within Manatee County is an issue that was prevalent through public outreach efforts and the collection and analysis of housing data especially affordable housing for lower income households.

<b>Goal 6: Code Enforcement on Substandard Rental Units</b>	
Contributing Factors	The absence of strong code enforcement on rental units and no rental registration process.
Fair Housing Issues	Lack of code enforcement on substandard rental units.
Metrics & Milestones	6.1 Explore best practices for rental housing code enforcement and provide recommendations to Manatee County Administration by September 30, 2018.  6.2 Review Ordinance No. 15-10 pertaining to property maintenance and structural standards and provide recommendations to Manatee County Administration by September 30, 2018.
Timeframe for Achievement	2017-2018 (2 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (6.1 and 6.2)
Discussion	Through outreach efforts and data collection it is clear that the quality of affordable housing for lower income households is lacking. Establishment of more stringent rental housing enforcement and inspection procedures should be explored in order to better maintain the County's rental housing stock.
<b>Goal 7: Address Patterns of Poverty and Segregation</b>	
Contributing Factors	Lack of economic opportunity and lower levels of educational attainment, income, and language proficiency in R/ECAP Census Tracts when compared to Manatee County as a whole.
Fair Housing Issues	<u>Segregation</u> . The County's current R/ECAPs are located near the City of Bradenton. The northern R/ECAP is located southeast of downtown Bradenton, between 1st St./U.S. 41 and 15th St. E. (south of U.S. 301 and north of 44th Ave. E./Cortez Rd.). The southern R/ECAP is located south of Bradenton, between 14th St. W. and 15th St. E. (south of 53rd Ave. E. and north of 63rd Ave. E.). In addition, the County has other neighborhoods that experience high levels of segregation and poverty than other areas of Manatee County.
Metrics & Milestones	7.1 Partner with community resources and local non-profit agencies to provide services that reduce poverty concentration (e.g. job training, child care, financial literacy, English as a second language, etc.) annually beginning October 1, 2018.  7.2 Service 15 households through Family Self-Sufficiency Program with a goal to increase income and relocate out of R/ECAP area(s) annually beginning October 1, 2017.
Timeframe for Achievement	2017-2021 (5 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (7.1 only); Manatee County Housing Authority (7.2 only)

**MANATEE COUNTY 2017-2021 ASSESSMENT OF FAIR HOUSING**

Discussion	GIS mapping show clear areas of segregation within Manatee County. Some areas of segregation also experience high levels of poverty.
<b>Goal 8: Reinvestment in R/ECAPs</b>	
Contributing Factors	Lack of reinvestment in R/ECAP areas
Fair Housing Issues	Blighted structures in and around R/ECAP areas
Metrics & Milestones	8.1 Eliminate blight conditions in R/ECAP areas through targeted demolition and redevelopment or rehabilitation by September 30, 2019.  8.2 Develop neighborhood plan(s) for the R/ECAPs to identify the issues that need to be addressed and resources to offset contributing factors by September 30, 2019.
Timeframe for Achievement	2017-2019 (3 years)
Responsible Program Participants	Manatee County Redevelopment and Economic Opportunity Department (8.1 and 8.2)
Discussion	The analysis identified segregated areas and R/ECAPs generally lack access to opportunity. Additionally, publicly supported housing is predominantly located in these areas. Generally, there is a lack of businesses, jobs, and necessary services in these segregated/high poverty areas. The lack of community revitalization strategies has been selected as a contributing factor of priority affecting the fair housing issues of segregation, R/ECAP, disparities in access to opportunity, and disproportionate housing needs.

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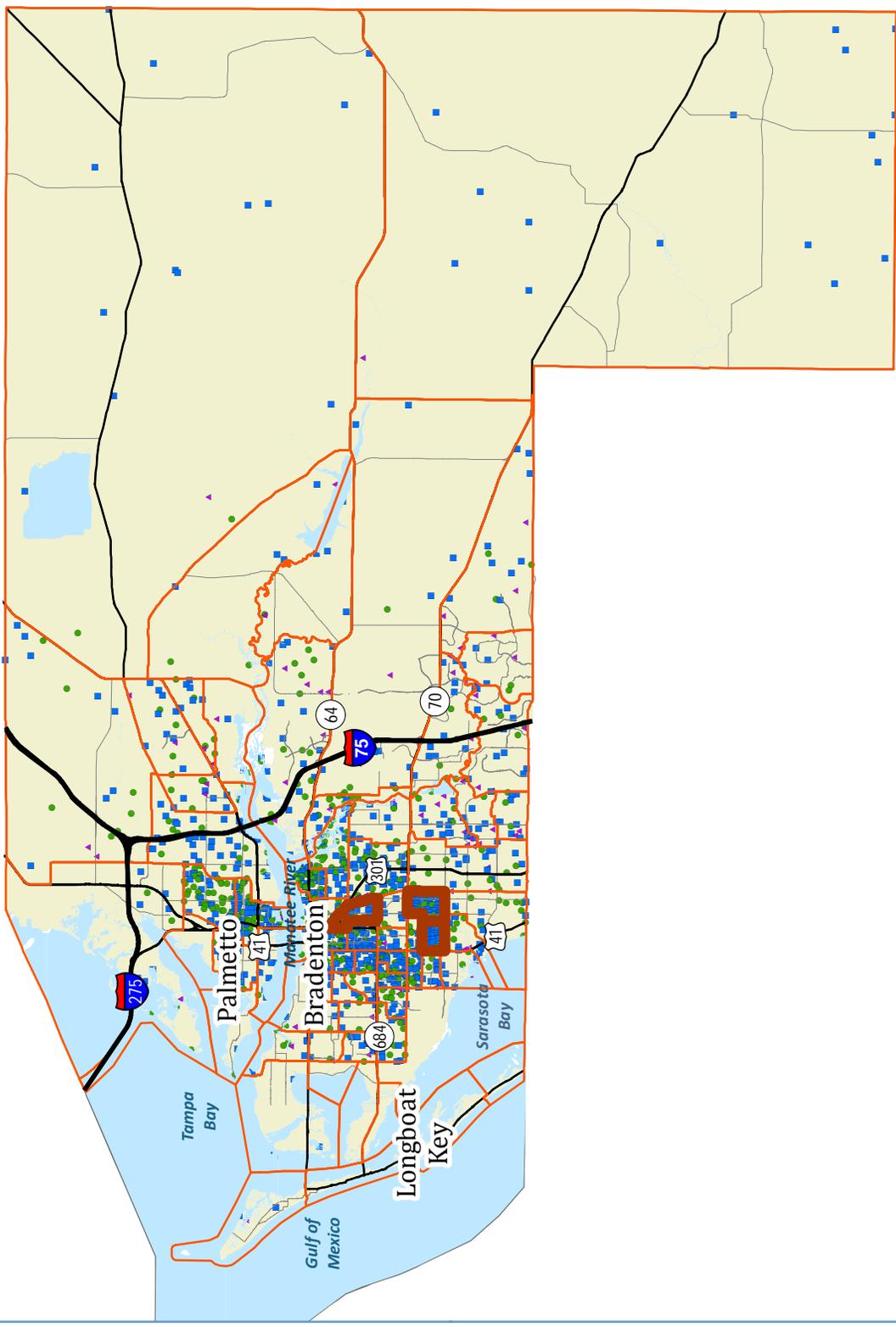
## 7.0 Appendix

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**Maps**

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# Manatee County R/ECAPS



Demographics 2010 (1 Dot = 10 People)

- Black/African-American
- ▲ Asian or Pacific Islander
- Hispanic

**▭** Racially/Ethnically Concentrated Areas of Poverty (R/ECAPS)

**▭** Census Tracts (2010)

**▭** Incorporated Cities

**▭** Unincorporated

**▭** Manatee County

**▭** Water

**▭** Interstates

**▭** Highways

**▭** Major Roads

**▭** Minor Roads

Source: 2010 U.S. Census Data obtained from the U.S. Census Bureau, TIGER/Line Shapefiles with Selected Demographic and Economic Data.

October 2016



# Manatee County R/ECAPs (Detail)

Demographics 2010 (1 Dot = 10 People)

- Black/African-American
- ▲ Asian or Pacific Islander
- Hispanic

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

Census Tracts (2010)

Incorporated Cities

Unincorporated Manatee County

Water

Interstates

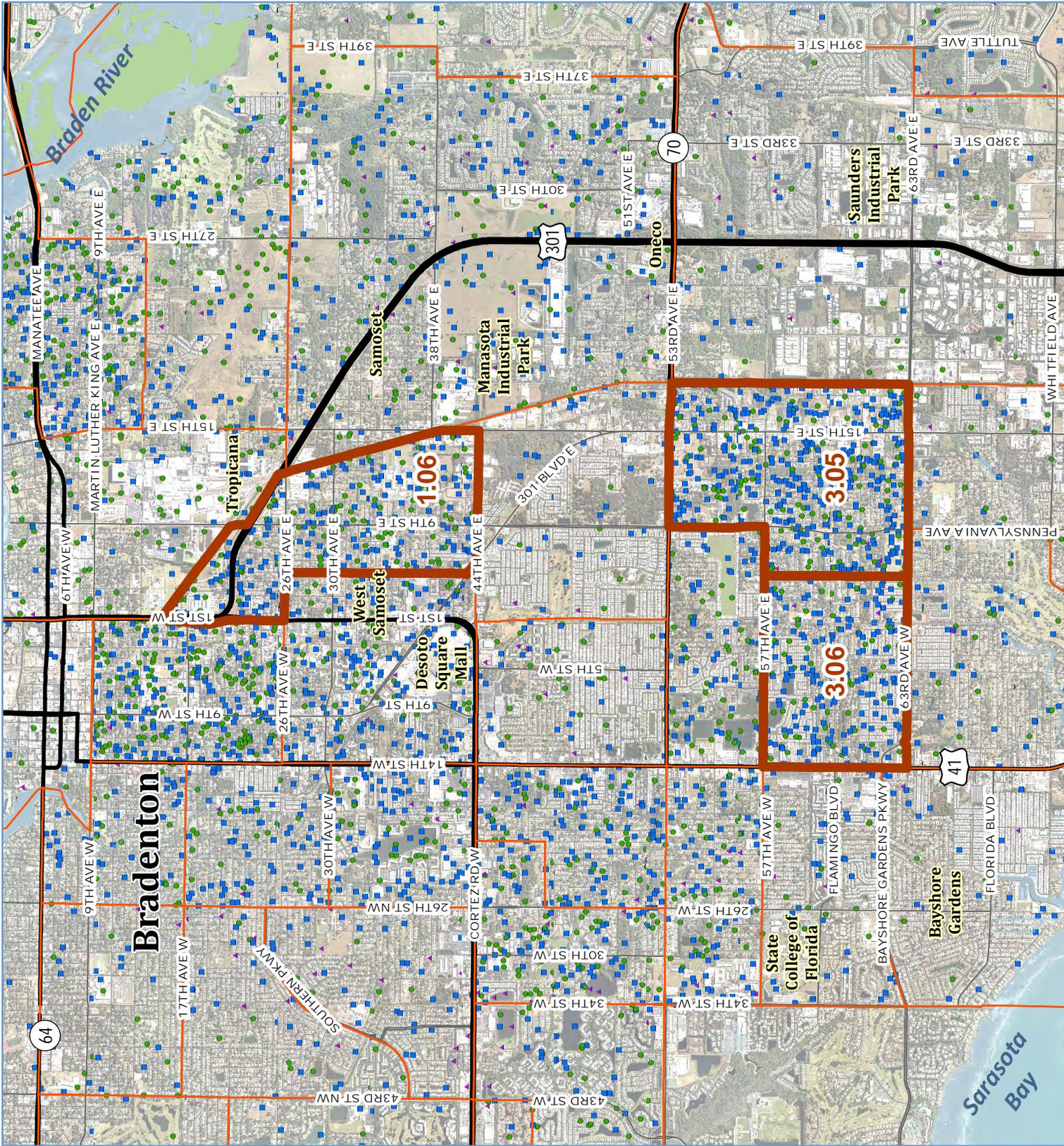
Highways

Major Roads

Minor Roads

Source: 2010 U.S. Census Data obtained from the U.S. Census Bureau, TIGER/Line Shapefiles with Selected Demographic and Economic Data.

October 2016



**Public Outreach**

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**Amended Citizen Participation Plan**

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# Citizen Participation Plan



## Statement of Purpose

Manatee County recognizes that citizen participation is a very important part of the consolidated planning process. To better guide the County's outreach in gaining citizen input, the County has developed a Citizen Participation Plan. The Manatee County Citizen Participation Plan is designed to create opportunities for citizens to be involved in the development of the Consolidated Plan, Annual Action Plans, the implementation of Substantial Amendments, Assessment of Fair Housing (AFH), and annual performance reporting. These plans and documents are required in order to keep compliance with federal regulations related to the Community Development Block Grant (CDBG), HOME Investment Partnerships, and Emergency Solutions Grant (ESG) programs.

### **INTRODUCTION**

In accordance with 24 CFR Section 91.105, the Manatee County Redevelopment and Economic Opportunity Department has prepared a Citizen Participation Plan to explain the opportunity all residents have to participate in the process of preparing the Consolidated Plan. The Manatee County Redevelopment and Economic Opportunity Department is responsible for administering the Citizen Participation Plan.

The overall goal of the Consolidated Plan is to utilize federal, state and local funding in a coordinated manner to promote the development of viable communities. Viable communities are described as meeting the residents' needs in regards to affordable and decent housing, a safe and suitable living environment, and adequate economic opportunities particularly for low- and moderate-income persons.

Citizen participation will be encouraged during development of the Consolidated Plan, Annual Action Plans, any Substantial Amendments, AFH, and the Performance Report, by providing notice to residents and local organizations through various media methods.

The Citizen Participation Plan sets forth the policies to be used for citizen participation and outlines the procedures to be used to encourage the participation of all Manatee County residents – especially residents who are low-income, minorities, non-English speaking, disabled, and persons with HIV/ AIDS.

## Five-Year Consolidated Plan

### **PUBLIC HEARINGS**

In accordance with 24 CFR Section 91.105, Manatee County will host, at a minimum, one Board of County Commissioners (BOCC) public hearing during the development of the Consolidated Plan, prior to its proposed adoption by the Board of County Commissioners for submission to HUD.

### **PUBLIC NOTICE**

The County will publish a notice of availability of the Consolidated Plan and corresponding Annual Action Plan for public review in a newspaper of general circulation, on the County's website at [www.mymanatee.org](http://www.mymanatee.org) and in any widely disseminated smaller publications serving low- and moderate-income persons or special needs populations. The date of publication will be the beginning of a 30-day public comment period at the end of which a public hearing on the Consolidated Plan and corresponding Annual Action Plan will also be held.

The notice of availability shall include a summary of the Consolidated Plan as well as a summary of those sections of the Consolidated Plan that concern HOME funds. The summary will describe the contents and purpose of the Consolidated Plan, and will include a list of locations where copies of the entire Consolidated Plan may be examined.

### **COMMENT PERIOD**

Prior to the BOCC's approval of the Consolidated Plan, a 30-day public comment period shall be held as required by HUD.

The County shall publish a draft of the Consolidated Plan (including the corresponding Annual Action Plan) to be available during the 30-day comment period so that citizens have an opportunity to review the Consolidated Plan prior to adoption.

During the 30-day comment period, the Redevelopment and Economic Opportunity Department will receive written comments on the Consolidated Plan from the public and will later include those comments and the County's responses in the final publication of the Consolidated Plan.

Copies of the draft Consolidated Plan will be available for review at the Central Library, South Manatee and Palmetto Branches of the Manatee County Public Library System. Upon request, the Redevelopment and Economic Opportunity Department of Manatee County will provide a reasonable number of additional copies to citizens and groups.

The Manatee County BOCC, as the elected authority of the citizens of Manatee County, has responsibility for the Consolidated Plan. All public comments shall be reviewed and taken into consideration by the Board. The BOCC authorizes final publication of the Consolidated Plan and Annual Action Plan as well as their submission to HUD.

#### **SUBMISSION OF THE PLAN**

Following approval by the BOCC, the Consolidated Plan will be submitted to HUD no later than 45 days prior to the start of the program year. Upon submission, all certifications of compliance will be included.

### **Annual Action Plan**

Each program year, as a part of the consolidated planning process, Manatee County must develop an Annual Action Plan that identifies sources of funding, statement of objectives, description of projects, graphic distribution, monitoring of sub-recipients, and results of past efforts.

#### **PUBLIC HEARINGS**

To receive public input prior to the adoption of the Annual Action Plan, the BOCC shall hold a minimum of one public hearing at the conclusion of a 30-day public comment period as required by HUD.

#### **PUBLIC NOTICE**

A public notice shall be published in a newspaper of general circulation, on the County's website at [www.mymanatee.org](http://www.mymanatee.org) and in any widely disseminated smaller publications serving low- and moderate-

income persons or special needs populations no less than 10 days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

The public notice shall include a summary of the proposed Annual Action Plan and all pertinent information as to where the Annual Action Plan is available for public examination, including the location's address and hours of availability.

### **COMMENT PERIOD**

A 30-day comment period of the draft Annual Action Plan will be established for public review prior to submission to the Manatee County Board of County Commissioners for final consideration and adoption.

Hard copies of the draft Annual Action Plan will be available for review at the Central Library, South Manatee and Palmetto Branches of the Manatee County Public Library System. The Redevelopment and Economic Opportunity Department will provide electronic copies of the Annual Action Plan to interested citizens and organizations upon request.

Once the Annual Action Plan has been approved by the BOCC and submitted to HUD, a 45-day HUD review period will commence.

### **SUBMISSION OF THE PLAN**

Following approval by the BOCC, the Consolidated Plan will be submitted to HUD no later than 45 days prior to the start of the program year. Upon submission, all certifications of compliance will be included.

## **Substantial Amendments**

If there are changes because of legislative authority or the Department of Housing and Urban Development (HUD) causes changes in rules, regulations and guidelines which impact the CDBG, HOME, or ESG Programs, said changes will supersede any/all of the provisions contained in this Citizen Participation Plan. In addition, any general or substantial amendment to any portion of the Consolidated Plan will follow HUD's prescribed notice and comment period requirements.

Prior to the submission of any substantial change in the proposed use of funds, citizens will have reasonable notice of, and the opportunity to comment on, the proposed amendment using the citizen participation methods outlined in this Citizen Participation Plan and/or other methods that result in effective notice and comment. Substantial amendments may be made up to six times per program year.

The following actions necessitate a substantial amendment to the Consolidated Plan:

- A change in the use of CDBG, HOME, ESG or other HUD funds from one activity to another.
- The elimination or addition of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change in the purpose of an activity originally described in the Annual Action Plan and/or Consolidated Plan, such as a change in the type of activity or its ultimate objective (i.e., a change in a construction project from housing to commercial).
- A meaningful change in the location of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change that increases or decreases funding or the cost of an activity, project or program by more than 20% of the funds that were originally allocated for that activity, project or program as originally described in the Annual Action Plan. (This does not include activities, projects or programs that are completed under budget by more than 20%. In such cases, the unspent balance may go to existing previously approved activities.)
- A change required by Federal law or regulation.

## **PUBLIC HEARINGS**

Substantial Amendments to the CDBG, HOME, or ESG activities shall require approval by the Manatee County BOCC. The BOCC shall hold a minimum of one public hearing for public input on any Substantial Amendments. Prior to amending its Consolidated Plan for a new activity or a substantial change, the County will publish a notice of the substantial change in a newspaper of general circulation, on the County's website at [www.mymanatee.org](http://www.mymanatee.org) and in any widely disseminated smaller publications serving low- and moderate-income persons or special needs populations no less than 10 days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

## **COMMENT PERIOD**

The public shall be given an opportunity to comment on any Substantial Amendments made to the County's Consolidated Plan or Annual Action Plan. After proper notice is given, a 30-day public review period will be required to obtain public comment prior to BOCC approval.

Copies of the draft Substantial Amendments will be made available for review by the Redevelopment and Economic Opportunity Department and on the County's website at [www.mymanatee.org](http://www.mymanatee.org). Copies of the Substantial Amendments will be made available to interested citizens and organizations upon request.

## **Performance Reports**

Each year the County will issue a Performance Report showing the progress it has made in carrying out its Strategic Plan and Action Plan.

The Performance Report, or the Consolidated Annual Performance and Evaluation Report (CAPER), will include a description of the resources available, the investment of those resources, where those resources were spent geographically, persons assisted (including the racial and ethnic status of persons assisted), actions taken to further fair housing, and other actions indicated in the Strategic Plan and Action Plan. The County must send HUD a CAPER by December 30 or within 90 days of the close of the program year. Manatee County's program year begins on October 1 and ends on September 30.

## **PUBLIC HEARINGS**

The County will hold a minimum of one public hearing with the BOCC to consider any comments or views of citizens in relation to the published Performance Report. A public notice shall be published in a local newspaper and on the County's website at [www.mymanatee.org](http://www.mymanatee.org) no less than 10 days prior to the hearing date to notify the public of their opportunity to attend the hearing and provide comment.

## **COMMENT PERIOD**

The County will receive comments and make all Performance Reports available to the public at least 15 days prior to submission to HUD. The County will consider any comments or views of citizens received in writing or orally at public hearings in preparing the final version of Performance Reports.

A summary of these comments will be attached to the Performance Report, upon completion of the final version to be submitted to HUD. HUD conducts a 30-day review of the Performance Report after submission.

Copies of the draft CAPER will be made available for viewing by the Redevelopment and Economic Opportunity Department and located on the County's website at [www.mymanatee.org](http://www.mymanatee.org). Copies of the CAPER will be provided to interested citizens and organizations, upon request.

## Assessment of Fair Housing (AFH)

### **Public Hearings**

In accordance with the Department of Housing and Urban Development (HUD) requirements, a minimum of one public hearing shall be held for public input for the AFH, prior to the draft document being made available for 30-day public comment. An additional public hearing shall be held within the noticed 30-day public comment period and prior to approval by the Board of County Commissioners.

### **Public Notice**

The County will publish a notice of availability of the AFH for public review in a newspaper of general circulation, on the County's website at [www.mymanatee.org](http://www.mymanatee.org) and in any widely disseminated smaller publications serving low- and moderate-income persons or special needs populations. The date of publication will be the beginning of a 30-day public comment period at the end of which a public hearing on the AFH will also be held.

The notice of availability shall include a summary of the AFH. The summary will describe the contents and purpose of the AFH, and will include a list of locations where copies of the entire AFH may be examined.

The summary will describe the contents and purpose of the AFH, and will include a list of locations where copies of the entire proposed AFH may be examined.

### **Comment Period**

Prior to the BOCC's approval of the AFH, a 30-day public comment period shall be held as required by HUD.

The County shall publish a draft of the AFH to be available during the 30-day comment period so that citizens have an opportunity to review the AFH prior to approval and submission to HUD.

During the 30-day comment period, the Redevelopment and Economic Opportunity Department will receive written comments on the AFH from the public and will later include those comments and the County's responses in the final publication of the AFH.

Copies of the draft AFH will be available for review at the Central Library, South Manatee and Palmetto Branches of the Manatee County Public Library System. Upon request, the Redevelopment and Economic Opportunity Department of Manatee County will provide a reasonable number of additional copies to citizens and groups.

The Manatee County BOCC, as the elected authority of the citizens of Manatee County, has responsibility for the AFH. All public comments shall be reviewed and taken into consideration by the Board. The BOCC authorizes final publication of the AFH as well as their submission to HUD.

### **Submission of the Plan**

Following approval by the BOCC, the AFH will be submitted to HUD.

## **Consultation**

During the development of the AFH and/or Consolidated Plan year Manatee County will make every effort to consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The agencies may include local Public Housing Authorities and the local Continuum of Care. Manatee County shall also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the AFH and the Consolidated Plan.

Consultation will also include coordination with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities.

## Comments/Grievances

The County's Redevelopment and Economic Opportunity Department Director or designee will provide a timely written response to complaints, comments, and grievances, within 15 working days, where practicable.

## Public Hearings/Public Notices

Manatee County will host, at a minimum, two public hearings with the BOCC annually during the Five-Year Consolidated Plan's term.

To receive public input prior to the adoption of the Annual Action Plan, the BOCC shall hold a minimum of one public hearing at the conclusion of the 30-day public comment period as required by HUD. A second BOCC public hearing will be held later in the program year to consider comments from citizens regarding the published Performance Report (CAPER).

To ensure that advance notice is provided to the public and that BOCC public hearings are accessible to persons with special needs, the County will:

- Publish a notice of the BOCC public hearing in a newspaper of general circulation, on the County's website and in any widely disseminated smaller publications serving low- and moderate- income persons or special needs populations 10 days prior to the day of the BOCC public hearing to allow interested parties to attend.
- Published notices in readable size and provide complete summary information on the purpose of the BOCC public hearing, the date, time and location of the BOCC public hearing, and contact information for persons who may have questions about the BOCC public hearing or who may require information regarding accessibility for persons with special needs.
- Provide a translator at the prior written request of an individual or organization representing non-English speaking persons. Written requests must be made to the Manatee County

Redevelopment and Economic Opportunity Department, a minimum of five business days prior to BOCC public hearing dates.

- Disseminate this information at appropriate County libraries, government offices and public spaces.

## Community Meetings

Manatee County will host, at a minimum, two community meetings with low- and moderate-income persons and special needs populations annually during the Five-Year Consolidated Plan's term to solicit comments on the strategies and proposed use of funds and to review program performance.

To ensure that advance notice is provided to the public and that community meetings are accessible to persons with special needs, the County will:

- Publish a notice of the community meeting in a newspaper of general circulation, on the County's website and in any widely disseminated smaller publications serving low- and moderate-income persons or special needs populations 10 days prior to the day of the community meeting to allow interested parties to attend.
- Publish notices in readable size and provide complete summary information on the purpose of the community meeting, the date, time and location of the community meeting, and contact information for persons who may have questions about the community meeting or who may require information regarding accessibility for persons with special needs.
- Disseminate this information at appropriate County libraries, government offices and public spaces.

## Access to Information

Citizens, public agencies and other interested parties, including those most affected, will have the opportunity to receive information, and review and submit comments on any proposed submission concerning any of the following documents:

- The proposed and final Annual Action Plans
- The proposed and final 5-Year Consolidated Plan

- Proposed and final Substantial Amendments to either an Annual Action Plan or the 5-Year Consolidated Plan
- Annual Performance Reports
- The Citizens Participation Plan
- Assessment of Fair Housing (AFH)
- Other plans requiring submission to HUD

Copies of the previously identified documents will be made available at advertised public buildings and upon request from the Redevelopment and Economic Opportunity Department.

All correspondence, records, and minutes of BOCC public hearings will be retained in the Redevelopment and Economic Opportunity Department and by the Clerk of the Circuit Court. All input received through, or in association with, community meetings and workshops will be retained in the Redevelopment and Economic Opportunity Department only. Any pertinent information such as written proposals from a citizens group, etc., will be presented to the Neighborhood Services staff for review and consideration. If assistance in reading or obtaining program records is needed, the Redevelopment and Economic Opportunity Department should be contacted at 941-749- 3029 or interested parties can access records at the Redevelopment and Economic Opportunity Department at 1112 Manatee Avenue West, 5th Floor, Bradenton, Florida, 34206.

Interested parties may also access many of the program documents at the Manatee County website, [www.mymanatee.org](http://www.mymanatee.org).

## Technical Assistance

Technical assistance will be provided to citizens, citizen groups, nonprofit organizations and agencies as needed in developing project proposals. Such assistance is available upon request from the Redevelopment and Economic Opportunity Department. Anyone needing technical assistance should contact the Manatee County Redevelopment and Economic Opportunity Department at 941-749-3029.

## Anti-Displacement

The County has not, nor does it anticipate, funding any activities that will displace any residents or businesses. If displacement does occur, the residents or businesses displaced would be entitled to compensation and/or assistance under applicable Federal laws. Should the need for displacement ever arise, the County will officially notify the residents or businesses expected to be displaced as soon as practicable following approval of the activity. The notice will include a description of the proposed action, a discussion of how the resident or business owner might be affected, and information concerning their rights and benefits.

The County's Local Relocation and Anti-Displacement Policy provides more information on this subject. It is included in the Appendix of the Consolidated Plan.

## Use of the Plan

Manatee County will follow this Citizen Participation Plan in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, Annual Action Plan, AFH, and the Performance Report.

For more information regarding the Consolidated Plan or to submit your comments:

Inquiries and complaints concerning the Consolidated Plan, any substantial amendments to the Consolidated Plan, Annual Action Plan, AFH, or the Performance Reports can be conveyed by contacting the County staff at:

*Manatee Consolidated Plan Comments*

*Manatee County Redevelopment and Economic Opportunity Department*

*1112 Manatee Avenue West, 5th Floor*

*Bradenton, FL 34206*

*Telephone: 941-749-3029 • Fax: 941-749-3027*

*Telephone en Espanol: 941-749-3029*

Complaints and related comments on the programs may also be offered at the public hearings. Written complaints may also be made to the Jacksonville Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

*U.S. Department of Housing and Urban Development Community Planning and Development  
Division Charles Bennett Federal Building  
400 West Bay Street, Suite 1015  
Jacksonville, FL 32202  
Telephone: 904-232-1777  
Fax: 904-232-3617*

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