

Manatee County, Florida

Analysis of Impediments to Fair Housing Choice



May 28, 2024

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1.0 EXECUTIVE SUMMARY

The Manatee County Analysis of Impediments to Fair Housing Choice (AI) Report consists of 10 sections, including the Introduction, Community Profile, Statutory and Regulatory Policies, Public & Private Policies, Practices, and Procedures, Manatee County Fair Housing Program Actions, Citizen Participation and Consultation, Nature and Extent of Fair Housing Issues, Summary and Synthesis, and Resolution and Commitment. Each of these sections is summarized below.

INTRODUCTION

Section 2.0, Introduction, of the AI Report provides a brief introduction to all federal grant programs in which Manatee County participates. It outlines the purpose of the AI Report, provides Fair Housing definitions, and gives an overview of the methodology used for the analysis.

COMMUNITY PROFILE

Section 3.0, Community Profile, of the AI Report reviews the community characteristics of Manatee County, Florida. This section provides a countywide and Urban County demographic, housing, and economic profile to analyze the historical and current trends related to Fair Housing. Key takeaways from this section include:

Demographic Characteristics

Population and Racial or Ethnic Trends

- The population in Manatee County nearly doubled since the year 2000.
- Of Manatee County's total population of 405,069, 78.3% identify as being White, 8.1% as being Black or African American, 7.9% as being two or more races, 2.2% as being Asian or Pacific Islander, and 0.3% as being American Indian or Alaskan Indian.
- There are 265,123 people within the CDBG Urban County (approximately two thirds of the total County population). Of that population, White, Non-Hispanic people represent the majority racial and ethnic group (76.0%). Hispanic individuals comprise 13.7% of the Urban County population, followed by 6.9% Black, Non-Hispanic, and 1.8% Asian or Pacific Islander.
- Since 2000, Manatee County's Black or African American population increased by 52.1% and the County's White population increased by 39.0%.

Age and Disability

- The median age in Manatee County is 49.4 years of age.
- Approximately 14.6% of noninstitutionalized people in Manatee County reported having a disability, of which 59.8% are 65 years of age or older.
- The three most prevalent disability types in the Urban County are ambulatory difficulty (7.4%), cognitive difficulty (5.1%), and hearing difficulty (4.9%).

Language and National Origin

- Within the Urban County, 6.62% of the population is limited English proficient.

- Within the Urban County, the most common countries of National Origin, outside of the United States of America, are Mexico (3.3%), Canada (1.32%), Cuba (0.84%), Other Central American Countries (0.72%), and Other Caribbean Countries (0.64%).
- From 2000 to 2022, the County experienced a 178.5% increase in the Hispanic Origin population.

Housing Characteristics

Tenure

- In Manatee County, 15,412 vacant housing units may be suitable for rehabilitation.
- More than 67% of all residential properties within Manatee County are single units, most of which are detached structures.
- Of the 161,656 occupied housing units in Manatee County, 74.9% housing units were owner occupied and 25.1% units were renter occupied.

Cost Burden

- The current median home value for Manatee County is estimated to be \$323,900.
- Approximately 44.1% of rental units have monthly rent over \$1,499.
- Within Manatee County, 68.9% of households do not presently experience cost burden, while 15.9% experience cost burden, 13.6% experience severe cost burden and nearly 2% have no/negative income.
- In total, among all income groups, 13,042 renters have a cost burden greater than 30% of income and 15,252 owners have a cost burden greater than 30% of income.
- Within the CDBG Urban County, 25.51% of other, Non-Hispanic persons, 22.1% of Hispanic persons, and 20.98% of Black, Non-Hispanic persons have a higher percentage of households with severe housing cost burden.

Housing Problems

- On average, 32% of households in the CDBG Urban County experience any one of four housing problems.
- Half (50%) of renter-occupied housing units in the County have at least one housing condition.
- Renters in the 0-30% AMI group experience the highest occurrence of one or more housing problems when compared to other income groups.
- Within the County, approximately 31% of owner-occupied units and 40% of renter-occupied units are presumed to have a higher risk of lead-based paint.

Economic Characteristics

Income and Poverty

- Manatee County has a median family income of \$88,147 per year and median household income of \$71,385, with 6.5% of families falling below the federal poverty level and 10.2% of individuals falling below the federal poverty level.
- Native Hawaiian and Other Pacific Islanders hold the highest percentage of persons living below the federal poverty level at 36.3%; this is followed by Hispanic or Latino persons at 17.1%.

Employment and Jobs

- The Asian or Pacific Islander populations in Manatee County have less access to proximate jobs while the Black, Non-Hispanic and Hispanic populations have less access to the labor market than other race/ethnicity groups. When poverty level is considered, the Native American, Non-Hispanic population below poverty level has the least access to the labor market when compared to other race/ethnicity groups.
- Management, business, science, and arts occupations account for the largest number of occupations in Manatee County, with 66,542 people.
- Within Manatee County there are fewer jobs than workers within seven (7) industries: manufacturing; retail trade; transportation and warehousing, and utilities; information; finance and insurance, and real estate and rental and leasing; professional, scientific, and management, and administrative and waste management services; and other services, except public administration.

STATUTORY AND REGULATORY POLICIES

Section 4.0, Statutory and Regulatory Policies, of the AI Report reviews statutory and regulatory policies that create barriers to Fair Housing choice. This section analyzes isolation and integration across the County on a Census Tract level to help identify where barriers may exist. Key takeaways from this section include:

- Manatee County's CDBG Urban County currently experiences low to moderate segregation between different racial groups.
- There are disproportionate concentrations of Black/African Americans in Census Tracts 1.03, 7.05, 15.0, and 7.03, leading to racial isolation in these areas.
- Census Tracts 1.05, 1.06, and 3.05 have the highest concentrations of Hispanic or Latino population within the County, leading to ethnic isolation in these areas.
- These Census Tracts also have a high poverty rate, 1.05 (25.9%), 1.06 (14.6%), 3.05 (15.9%), 3.13 (13.6%), and 3.14 (14.1%) compared to Manatee County as whole (10.2%).

PUBLIC & PRIVATE POLICIES, PRACTICES, AND PROCEDURES

Section 5.0, Public & Private Policies, Practices, and Procedures, of the AI Report analyzes government and other sectors' role in affirmatively furthering Fair Housing and potential barriers to Fair Housing resulting from policies and procedures. This section includes an analysis of mortgage activity based on race or ethnicity and income categories.

MANATEE COUNTY FAIR HOUSING PROGRAM ACTIONS

Section 6.0, Manatee County Fair Housing Program Actions, discusses the actions of Manatee County Government, Manatee County Housing Authority (MCHA), and the Affordable Housing Advisory Committee (AHAC) to affirmatively further Fair Housing in their respective roles in the County's institutional delivery structure. Actions are cross-referenced to the goals identified in the Manatee County 2017-2021 Assessment of Fair Housing (AFH). Of note, limited funding was identified as an impediment to achieving all identified goals from the AFH.

The Manatee County Board of County Commissioners brings awareness to Fair Housing issues by making an annual proclamation for Fair Housing Month every April and provides Fair Housing information on social media and the County's website. The County also affirmatively furthers Fair Housing by providing incentives to reinvest in neighborhoods through various grant opportunities.

The MCHA provides a briefing packet with Fair Housing information when applicants come into MCHA offices for HCV or public housing assistance. The MCHA also has an online housing portal containing Fair Housing information.

The AHAC of Manatee County regularly evaluates barriers to affordable housing and considers Fair Housing and related concerns during its regular meetings and annual reporting.

CITIZEN PARTICIPATION AND CONSULTATION

Section 7.0, Citizen Participation and Consultation, discusses the input received through consultation with housing and public services providers, focus groups, and the public regarding Fair Housing experiences in Manatee County. Such experiences included common bases of discrimination, concerns with Fair Housing or issues, and assessment of whether sufficient Fair Housing resources are available in Manatee County.

NATURE AND EXTENT OF FAIR HOUSING ISSUES

Section 8.0, Nature and Extent of Fair Housing Issues, of the AI Report reviews Fair Housing complaint data in Manatee County from 2019 through 2023. The highest reported basis of discrimination in the County during this time was disability, followed by race.

SUMMARY AND SYNTHESIS

Section 9.0, Summary and Synthesis, of the AI Report provides the conclusions of the AI document.

RESOLUTION AND COMMITMENT

Section 10.0, Resolution and Commitment, of the AI Report identifies specific impediments, actions to be taken to address those impediments, and recommendations of how to take those actions. Six (6) impediments and actions were identified as follows:

Impediment #1:	Lack of Fair Housing education, awareness, and information for both landlords and tenants.
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Action:	<i>Expand Fair Housing education within Manatee County.</i>
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Impediment #2:	Limited availability of affordable housing for protected classes.
Action:	<i>Increase the availability of affordable housing in Manatee County.</i>
Impediment #3:	Racial and ethnic minorities are concentrated geographically within the County.
Action:	<i>Identify opportunities to reinvest in R/ECAPS to eliminate blighted conditions and spur redevelopment.</i>
Impediment #4:	Lack of code enforcement on substandard rental units.
Action:	<i>Strengthen code enforcement on substandard rental units.</i>
Impediments #5:	Lack of local contact for Fair Housing complaints and guidance.
Action:	<i>Improve the enforcement of Fair Housing laws and ordinances.</i>
Impediments #6:	Continued complaint activity in recent years.
Action:	<i>Focus Fair Housing efforts where complaint activity has increased.</i>

2.0 INTRODUCTION

Manatee County, Florida, is a participant in the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Program (HOME), and a recipient of Emergency Solutions Grant (ESG) funding. Since the inception of CDBG funds to entitlement communities, HUD has required various reports to satisfy the grantee jurisdiction's compliance with all laws, applicable programs, and regulations, and to demonstrate the community's ability to carry out the program in a timely manner. As a condition of compliance, communities who are awarded CDBG funds are instructed by HUD to conduct an Analysis of Impediments to Fair Housing Choice (AI) Report under 24 Code of Federal Regulations (CFR), Section 570.904[c], of the federal CDBG program.

The purpose of this analysis is to determine the possible existence of impediments to Fair Housing choices based upon race, religion, sex, color, national origin, disability, or familial status. If any impediments are identified, entitlement communities are directed to suggest necessary steps to reduce and/or eliminate barriers that prevent "affirmatively furthering Fair Housing".

In the Fair Housing Planning Guide, HUD defines the AI as: ". . . A comprehensive review of states or entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices. The AI Report involves an assessment of how these laws, policies and procedures affect the location, availability and accessibility of housing and how conditions, both private and public, affect fair housing choice."

Additionally, HUD published an Interim Final Rule that went into effect on July 31, 2021, which restored certain Fair Housing definitions and certifications from the 2015 Rule, whereby grantees may choose to engage in Fair Housing planning processes such as updating an existing or creating a new AI Report or Assessment of Fair Housing (AFH) to support the grantee's certification that is affirmatively furthering fair housing under regulation 24 CFR 91. A means to such certification is to "(1) conduct an analysis of impediments to fair housing choice, (2) take appropriate actions to overcome the effects of impediments identified through that analysis, and (3) maintain records reflecting the analysis and actions."

2.1 FAIR HOUSING CHOICE

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. The State of Florida has a Fair Housing law (Chapter 760, Part II) similar to the Federal Fair Housing Act.

Housing choice throughout the United States has yet to realize the levels of equal access guaranteed in the Civil Rights Act affecting persons who encounter discrimination based on race, color, religion, sex, national origin, disability, or familial status. Fair Housing choice has come a long way over the past 55 years. However, recent reports show that barriers to affirmatively furthering Fair Housing still exist.

The National Fair Housing Alliance's (NFHA) 2023 Fair Housing Trend Reports provides up-to-date published findings and show that significant barriers still exist among persons based on race, color, religion, sex, national origin, disability, and familial status. Its key findings include:

- Housing discrimination persists nationwide and is severely underreported.
- In 2022 the National Fair Housing Alliance reported a total of 33,007 complaints of housing discrimination, an increase of 5.74% in complaints compared to 2021.
- Discrimination based on disability accounted for the majority (over 53%) of complaints filed.
- Equal access to affordable, quality credit continues to be a major fair lending issue throughout the United States. Underserved populations, including African Americans, Latinos, Native Americans, persons with disabilities, immigrants, and women, have long been subjected to various forms of lending bias.
- Many underserved groups continue to be steered to particular neighborhoods, with housing providers lying about availability or cost of apartments for minority populations.
- Persons of color are more likely to receive subprime loans, higher cost loans, and loans with extra fees.

- There were significant increases in complaints based on sex, domestic violence, and source of income.

2.2 METHODOLOGY USED

The purpose of this analysis is to identify any local housing concerns and impediments to the exercise of Fair Housing choice in Manatee County, Florida. Manatee County is an Urban County that is comprised of six local units of government including the City of Anna Maria, City of Bradenton, City of Bradenton Beach, City of Holmes Beach, Town of Longboat Key, and City of Palmetto.

This analysis attempts to identify any attitudes, barriers, institutional practices, and public policies which create barriers to affirmatively further Fair Housing within Manatee County. Research and analysis of information regarding housing choice and restrictions was based upon review of socioeconomic and housing characteristics. Data sources included U.S. Census Bureau 2000, 2010, and 2020 Decennial Census; 2011-2015 and 2018-2022 American Community Survey (ACS) 5-Year Estimates; HUD's Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, 2013-2018 CHAS, HUD IDIS Output, HMDA Aggregate Report 5 (2022), HUD Atlanta Office of Fair Housing and Equal Opportunity (FHEO), and reports and statistics from local, regional, State and Federal agencies, Manatee County data, and focus groups. Reflecting HUD guidelines concerning "recommended contents," this analysis incorporates the background of housing choice in Manatee County; federal, state, and local public policies; profiles describing socioeconomic conditions of persons who make up Manatee County; and community services provided by the County's CDBG program. This analysis includes institutional practices that affect the level of choice available within the area's housing market.

3.0 COMMUNITY PROFILE

The purpose of this profile is to describe the socioeconomic characteristics of Manatee County, Florida, which is essential to the short and long-term housing goals of the community. Socioeconomic characteristics include, but are not limited to, population size, age, gender, race, employment, housing value, tenure, and housing unit age. Compiling and examining data on these elements will help guide County officials in determining the housing needs of County residents.

Manatee County is located in southwest Florida on the eastern shore of the Gulf of Mexico. It is a densely populated area that is heavily comprised of various industries and commerce. The entire county is approximately 741 square miles with nearly 150 miles of coastline and is home to mouth of the Manatee River. Manatee County is bordered by Polk County, Sarasota County, Hardee County, Hillsborough County, and DeSoto County, and is approximately 40 miles from St. Petersburg and less than 60 miles from Tampa.

Manatee County was founded in 1855. Originally much larger than its current size, Manatee County covered 5,000 square miles and included all of what are now Charlotte County, DeSoto County, Glades County, Hardee County, Highlands County, Sarasota County, and part of Lee County.

Historically, Manatee County’s economy was based on trade and farming. Today, Manatee County employs over 400,000 residents and is comprised of industries in manufacturing, health care, retail, agriculture, and more.

Today, Manatee County is committed to a policy of diversity and inclusion. Recreation and community engagement are important attributes of the County. In addition to 33 parks and miles of beaches, Manatee County offers collaborative community activities, restaurants, and retail attractions making Manatee County an engaging place to live and work.

3.1 POPULATION PROFILE

Total Population

Table 1 illustrates population trends in Manatee County and surrounding areas over a 22-year period from 2000 through 2022. According to the 2022 ACS 5-year Estimates, Manatee County, Florida has a population of 405,069. According to the AFFH Data and Mapping Tool the current population of the Manatee County Urban County subset is 265,123 which accounts for approximately two thirds of the total population of the County.

Table 1 displays the population, number of households, and median income for the base year and most recent year, and the percentage of change over time. This data shows a dramatic 53.43% increase in population from 264,002 people in the year 2000 to 405,069 people estimated by the 2018-2022 ACS 5-Year Estimates. Concurrently, the number of households increased 43.75% from 112,460 households in the year 2000 to 161,656 households estimated by the 2018-2022 ACS 5-Year Estimates. Median income also experienced a drastic increase of 84.59% from \$38,673 in the year 2000 to \$71,385 estimated by the 2018-2022 ACS 5-Year Estimates. This significant shift in estimated incomes likely reflects the inflation experienced by households across the United States over the past two decades.

TABLE 1: POPULATION TRENDS

	Base Year	Most Recent Year	Percent Change
	2000 Census	2018-2022 American Community Survey 5-Year Estimates	
Population	264,002	405,069	53.43%
Households	112,460	161,656	43.75%
Median Income	\$38,673	\$71,385	84.59%

Data Source: 2000 Census; 2018-2022 American Community Survey 5-Year Estimates

Racial/Ethnic Population Breakdown

Table 2 illustrates the current (2022) breakdown of Manatee County’s total population by race and ethnicity. Due to changes in the U.S. Census Bureau’s data collection methods over the past 20 years, comparison by category is not always accurate. However, the recent data collection methodology has improved.

According to the 2018-2022 ACS approximately 92.1% of Manatee County’s population is one race. The County has approximately 405,069 persons, or 78.3%, that identified as White. In comparison, 32,860 or 8.1% of its population identified as Black or African American, while 31,954 or 7.9% of its population identified as being two or more races. Additionally, 1,389 persons or, 0.3% of the County’s population identified as being American Indian or Alaskan Indian, and 9,092 persons, or 2.2% of the County’s population identified as being Asian or Pacific Islander.

TABLE 2: RACIAL DISTRIBUTION

Racial Distribution	2000	Percent of Total Population 2000	2010	Percent of Total Population 2010	Percent of Total Change, 2000-2010	2022	Percent of Total Population 2022	Percent of Total Change 2000-2022
	#	%	#	%	%	#	%	%
Population of One Race	260,325	98.6%	316,349	98.0%	22%	373,115	92.1%	18%
White	227,981	86.4%	264,322	81.9%	16%	316,986	78.3%	20%
Black or African American	21,611	8.2%	28,230	8.7%	31%	32,860	8.1%	16%
American Indian and Alaskan Indian	728	0.3%	1,044	0.3%	43%	1,389	0.3%	33%
Asian or Pacific Islander	2,499	0.9%	5,493	1.7%	120%	9,092	2.2%	66%
Two or More Races	3,677	1.4%	6,484	2.0%	76%	31,954	7.9%	393%
Some Other Race	7,506	2.8%	17,260	5.3%	130%	12,788	3.2%	-26%
Total Population	264,002	100%	322,833	100%		405,069	100%	

Data Source: 2000, 2010 U.S. Census; 2018-2022 American Community Survey 5-Year Estimates

Table 3 describes the racial and ethnic distribution within the CDBG Jurisdiction (Urban County). As depicted, the data for the Urban County is reflective of the County as a whole. The Urban County is made up of predominantly White, Non-Hispanic population (76.0%). Hispanic individuals make up 13.7% of the Urban County population, followed by 6.9% Black, Non-Hispanic, and 1.8% Asian or Pacific Islander.

Additionally, the distribution of White, Non-Hispanic decreased since 1990 from 90.53% to 76.01% while Black, Hispanic, and Asian populations have increased since 1990.

Table 4 shows, since 2000, the Hispanic Origin population has grown significantly in Manatee County. From 2000 to 2022, the County saw a 178.5% increase in the Hispanic Origin population. The State of Florida saw a smaller increase with 113.9% in the Hispanic Origin population.

Table 4 illustrates the change in both the County’s Black or African American and White populations during this period. Since 2000, Manatee County’s Black or African American population increased by

52.1% and the County's White population increased by 39.0%. The State of Florida's Black or African American population increased by 43.7%, while the White population increased by 10.8%.

TABLE 3: RACE/ETHNICITY

(Manatee County CDBG) Jurisdiction	1990		Current	
	#	%	#	%
White, Non-Hispanic	145,854	90.53%	201,533	76.01%
Black, Non-Hispanic	7,996	4.96%	18,194	6.86%
Hispanic	5,822	3.61%	36,428	13.74%
Asian or Pacific Islander, Non-Hispanic	886	0.55%	4,771	1.80%
Native American, Non-Hispanic	317	0.20%	490	0.18%
Two or More Races, Non-Hispanic	N/A		3,285	1.24%
Other, Non-Hispanic	N/A		421	0.16%
TOTAL	160,875	100%	265,122	100%

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

The Black/African American Population map (Appendix A) shows the distribution of Black or African American population in the County. The Black or African American population is concentrated in the western part of the County, primarily in the cities of Bradenton and Palmetto, where the Black or African American population is greater than 41% in some areas. The Hispanic Population map (Appendix A) shows that Hispanic or Latino population is relatively evenly spread out throughout the county. The highest concentrations of Hispanic or Latino population is within the City of Bradenton. Most of the municipalities in Manatee County have less than 20% of Hispanic or Latino population. The concentration of other minority races is displayed on the Other Minority Race Population map (Appendix A). This map shows that most people who identified as Asian, American Indian or Alaska native, Native Hawaiian or Pacific Islander, or Two or more Races are concentrated in the denser portions of the western county.

TABLE 4: CHANGE IN RACE

Group	2000	2010	2022	2000-2022% Change
Manatee County				
White	227,981	264,322	316,986	39.04%
Black	21,611	28,230	32,860	52.05%
Hispanic Origin	24,540	47,955	68,333	178.46%
Florida				
White	12,465,029	14,106,162	13,807,410	10.77%
Black	2,335,505	2,999,862	3,355,708	43.68%
Hispanic Origin	2,682,715	4,223,806	5,738,283	113.90%

Data Source: 2000 and 2010 U.S. Census; 2018-2022 American Community Survey 5-Year Estimates

Age

According to the 2018-2022 ACS 5-Year Estimates, the population of Manatee County is notably older with roughly 65% of its population at 35 years of age or older. The median age in Manatee County is 49.4 years of age. The age and gender breakdown is shown in **Table 5**.

The Households with Persons Under Age 18 map (Appendix A) demonstrates households dispersed throughout the County, which include young people. There are higher percentages of persons under the age of 18 in the cities of Bradenton and Palmetto in addition to many portions of the eastern county. The location of elderly persons in Manatee County is frequent and notable. Coastal towns such as Anna Maria, Holmes Beach, and Longboat Key have census tracts with high concentrations of elderly people, displaying 26% or more households with persons 65 years and older, as seen in the Population of Age 65 and Over map (Appendix A).

TABLE 5: AGE AND GENDER DISTRIBUTION

Age-Cohort	2000			2010			2022		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Total Population	127,549	136,453	264,002	156,115	166,718	322,833	196,808	208,261	405,069
Under 5 years	7,572	7,330	14,902	9,223	9,099	18,322	8,935	8,781	17,716
5 to 9 years	7,887	7,524	15,411	9,281	8,855	18,136	10,025	9,383	19,408
10 to 14 years	8,075	7,550	15,625	9,414	9,113	18,527	10,615	10,760	21,375
15 to 19 years	7,407	6,609	14,016	9,239	8,861	18,100	10,691	9,640	20,331
20 to 24 years	6,255	5,641	11,896	8,160	7,871	16,031	10,113	9,577	19,690
25 to 34 years	14,617	14,405	29,022	16,393	16,360	32,753	20,817	21,000	41,817
35 to 44 years	17,922	18,119	36,041	17,930	18,797	36,727	21,050	21,373	42,423
45 to 54 years	15,574	17,003	32,577	21,275	22,773	44,048	23,364	24,500	47,864
55 to 59 years	6,723	7,748	14,471	9,979	11,734	21,713	13,981	15,338	29,319
60 to 64 years	6,650	7,744	14,394	10,811	12,556	23,367	14,433	16,450	30,883
65 to 74 years	15,252	17,770	33,022	18,453	20,532	38,985	28,572	32,777	61,349
75 to 84 years	10,886	14,004	24,890	12,124	14,072	26,196	18,715	20,450	39,165
85 years and over	2,729	5,006	7,735	3,833	6,095	9,928	5,497	8,232	13,729
Median age (years)	41.7	45.6	43.6	44.2	47.0	45.7	48.0	51.1	49.4

Data Source: 2000, 2010 U.S. Census; 2018-2022 American Community Survey 5-Year Estimates

Table 6 below details the age and gender distribution within the CDBG Jurisdiction (Urban County). The data show that, within the Urban County, nearly one-fifth of the population are under the age of 18, 59% are 18 years to 64 years old, and 24% are 65 year or older. Additionally, according to the AFFH Data and Mapping Tool, there are 24,807 families with Children within the Urban County (33.43%). Gender distribution within the Urban County is evenly divided among male and females.

TABLE 6: AGE AND GENDER DISTRIBUTION

(Manatee County CDBG) Jurisdiction		
Age	#	%
Under 18	52,636	19.85%
18-64	148,035	55.84%
65+	64,451	24.31%
Sex	#	%
Male	128,624	48.51%
Female	136,499	51.49%

*Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020;
Accessed March 2024*

Disability

According to the 2018-2022 ACS 5-Year Estimates 5-Year Estimates, disabilities are categorized into six types: hearing difficulty, vision difficulty, cognitive ability, ambulatory difficulty, self-care difficulty, and independent living difficulty. According to the 2018-2022 ACS 5-Year Estimates, approximately 58,683 or 14.6% of noninstitutionalized people in Manatee County reported having a disability. The majority (32,629 people or 59.8%) of this noninstitutionalized population is 65 years of age or older.

Physically disabled persons are those having an impairment that impedes their ability to function independently. According to the 2018-2022 ACS 5-Year Estimates 5-Year Estimates, the adult noninstitutionalized population between the ages of 18 and 64 is 217,445. Persons who have a physical disability may suffer from a hearing difficulty, vision difficulty, or an ambulatory difficulty. According to the same ACS dataset, there are approximately 17,520 adults (8.1%) between the ages of 18 and 64 who have a physical disability. These persons may also have a cognitive, self-care, and independent living impairment as well, and are also included in the developmentally disabled count.

The ACS defines disability as a long-lasting physical, mental, or emotional condition. Persons who have a developmental disability may suffer from a cognitive difficulty, a self-care difficulty, or an independent living difficulty. According to the ACS, this condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home or to work at a job or place of business. According to the ACS, 18,766 persons, or 8.6% of people, between the ages of 18 and 64 years have a developmental disability. These persons may also have a hearing, vision, and ambulatory impairment as well, and are also included in the physically disabled count.

The Disability Status map (Appendix A) shows the distribution of persons with a physical or developmental disability in the County. The population of disabled persons is relatively concentrated along 14th street, south of Bradenton, between the Manatee River and Sarasota Bay.

Table 7 shows disabilities by type in the CDBG Jurisdiction (Urban County) of Manatee County. The three most prevalent disability types in the Urban County are ambulatory difficulty (7.4%), cognitive difficulty (5.1%), and hearing difficulty (4.9%). Other disability types represented include independent living difficulty (4.9%), self-care difficulty (2.3%), and vision difficulty (2.1%). When compared to the County as a whole, the Urban County area has comparative percentages of persons with a disability of all types.

TABLE 7: DISABILITY BY TYPE

(Manatee County CDBG) Jurisdiction		
Disability Type	#	%
Hearing difficulty	13,192	4.92%
Vision difficulty	5,492	2.05%
Cognitive difficulty	13,743	5.13%
Ambulatory difficulty	19,705	7.35%
Self-care difficulty	6,199	2.31%
Independent living difficulty	13,152	4.91%

*Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020;
Accessed March 2024*

Opportunity Indicators, by Race/Ethnicity

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.

Table 8 shows opportunity indicators by race/ethnicity. Of the general population, the Black, Non-Hispanic and Hispanic demographics in Manatee County score notably lower on the low poverty index than their peers. When poverty level is considered, the Black, Non-Hispanic and Hispanic populations below poverty level once again score lower than the other demographics, aside from the Native American, Non-Hispanic population, which scores lowest on the low poverty index.

School-related policies have the potential to limit school choice or create situations where students living in concentrated areas of poverty are assigned to a less proficient school because of geography. Such situations could limit access to learning opportunities. **Table 8** shows opportunity indicators by race/ethnicity. Of the general population, the Black, Non-Hispanic and Hispanic populations in Manatee County have less access to proficient schools than other race/ethnicity groups. When poverty level is considered, again the Black, Non-Hispanic and Hispanic populations below poverty level have the least access to proficient schools when compared to other race/ethnicity groups.

Table 8 shows, the Asian or Pacific Islander populations in Manatee County have less access to proximate jobs while the Black, Non-Hispanic and Hispanic populations have less access to the labor market than other race/ethnicity groups. When poverty level is considered, the Native American, Non-Hispanic population below poverty level has the least access to the labor market when compared to other race/ethnicity groups.

TABLE 8: OPPORTUNITY INDICATORS, BY RACE/ETHNICITY

(Manatee County CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	60.21	44.34	51.29	58.54	40.71	35.11	57.49
Black, Non-Hispanic	37.11	25.43	38	61.83	45.82	40.63	57.78
Hispanic	36.39	25.16	37.64	63.34	47.03	40.64	57.24
Asian or Pacific Islander, Non-Hispanic	65.56	46.05	56.06	56.31	38.16	35	53.89
Native American, Non-Hispanic	49.86	35.22	44.79	62.54	44.9	37.09	58.52
Population Below Federal Poverty Line							
White, Non-Hispanic	49.72	32.42	43.22	65.07	47.09	34.62	59.84
Black, Non-Hispanic	25.16	17.78	32.73	65.66	49.63	41.3	58.78
Hispanic	21.16	22.17	29.97	65.54	50.61	44.97	57.37
Asian or Pacific Islander, Non-Hispanic	43.65	22.97	47.71	49.91	43.15	46.65	52.76
Native American, Non-Hispanic	17.63	20.84	27.82	82.63	68.61	24.95	61.71

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

Table 8 shows opportunity indicators by race/ethnicity related to Environmental Health. Of the general population, the Asian or Pacific Islander, Non-Hispanic population in Manatee County has the lowest access to environmentally healthy neighborhoods than other race/ethnicity groups. When poverty level is considered, again the Asian or Pacific Islander, Non-Hispanic population below poverty level has the least access to environmentally healthy neighborhoods when compared to other race/ethnicity groups.

According to the AFFH Data and Mapping Tool (data accessed in March 2024), in the Urban County, there are five Census Tracts that qualify as a Racially or Ethnically Concentrated Area of Poverty (R/ECAP). Qualifying tracts are 1.05, 1.06, 3.05, 3.13, and 3.14. These tracts are all found within or near the City of Bradenton.

Education

The correlation between education, employment, and income, while not necessarily a Fair Housing matter, does affect housing choice. **Table 9** illustrates the educational attainment for Manatee County and for the State of Florida. According to the 2018-2022 ACS 5-Year Estimates, 90.7% of persons in Manatee County have a high school diploma. This figure is slightly higher than the State of Florida at 89.3%. Additionally, Manatee County (32.8%) shows a marginally higher percentage of persons who have a bachelor's degree or higher compared the State of Florida (32.3%).

TABLE 9: EDUCATIONAL ATTAINMENT, 2022 - POPULATION 25 YEARS AND OLDER

Jurisdiction	Less than 9th grade	9th to 12th grade, no diploma	High School Graduate (Including equivalency)	Some college, no degree	Associate Degree	Percent Bachelor's Degree	Graduate or Professional Degree	Percent High School graduate or Higher	Percent Bachelor's Degree of Higher
Manatee County	3.5%	5.8%	29.3%	19.4%	9.2%	20.0%	12.9%	90.7%	32.8%
Florida	4.4%	6.4%	27.7%	19.2%	10.1%	20.2%	12.1%	89.3%	32.3%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Limited English Proficiency (LEP) and Linguistic Isolation

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. According to the AFFH Data and Mapping Tool, in Manatee County Urban County 6.62% of the population is considered to be limited English proficient. This is a slight increase from 4.56% in 2000. The most common LEP languages are Spanish (10.69%), Other Indo-European Language (1.01%), and French (.90%).

According to the 2018-2022 ACS 5-Year Estimates, approximately 4,083 households or 2.5% of Manatee County's total population are linguistically isolated. The U.S. Census Bureau defines "Linguistically Isolated" as all members of the household 14 years and older having at least some difficulty speaking English in the household. Manatee County has a lower percentage of linguistically isolated households than the State of Florida, as shown in **Table 10**. Given that the Hispanic population of Manatee County has been one of the fastest growing segments of the population, linguistic isolation could be more common in the future if trends continue.

TABLE 10: LINGUISTIC ISOLATION

Jurisdiction	Total Households	English Only Speaking Households	Spanish Speaking Households	Linguistically Isolated	Russian, Polish, or other Slavic Speaking Households	Linguistically Isolated	Other Indo-European Speaking Households	Linguistically Isolated	Total Asian and Pacific Speaking Households	Linguistically Isolated	Total Arabic Speaking Households	Linguistically Isolated	Other Speaking Language Households	Linguistically Isolated	Total Linguistically Isolated Households	Total Percent of Linguistically Isolated Households
Manatee County	161,656	132,657	18,357	2,613	1,771	529	5,644	567	2,351	268	228	0	648	106	4,083	2.5%
Florida	8,353,441	5,769,055	1,851,405	456,537	68,530	14,920	439,910	64,194	153,045	27,880	28,930	4,020	42,566	4,220	571,771	6.8%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

National Origin

According to the AFFH Data and Mapping Tool, in Manatee County's Urban County, the most common countries of National Origin, outside of the United States of America, are Mexico (3.3%), Canada (1.32%), Cuba (0.84%), Other Central American Countries (0.72%, and Other Caribbean Countries (0.64%).

3.2 HOUSING PROFILE

Housing Inventory

According to the 2000 U.S. Census, there were a total of 138,128 housing units in Manatee County, 112,460 or approximately 91.6% of the units were occupied while 8.4% or 25,668 of the units were vacant. However, according to the 2018-2022 ACS 5-Year Estimates, there were a total of 208,358 housing units in Manatee County, 161,656, or approximately 94.4% of these units were occupied. Traditionally, residential vacancy rates have been used as an indicator of equilibrium between supply and demand in a given housing market. **Table 11** illustrates the Housing Tenure in 2000, 2010, and 2022.

TABLE 11: HOUSING TENURE

Housing Tenure	Census 2000	Census 2010	ACS 2022	Change 2000-2022
Owner Occupied	82,947	96,818	121,011	45.9%
Renter Occupied	29,513	38,911	40,645	37.7%
Vacant	25,668	36,961	46,702	81.9%
Homeowner Vacancy Rate	8.4%	2.7%	5.6%	-33.1%
Rental Vacancy Rate	12.9%	4.2%	18.1%	40.0%
Total Housing Units	138,128	172,690	208,358	50.8%

Data Source: 2000, 2010 U.S. Census; 2018-2022 American Community Survey 5-Year Estimates

As shown in **Table 11**, Manatee County reported a total of 161,656 occupied housing units in 2022. Of 161,656 occupied housing units, 121,011 housing units were owner occupied and 40,645 units were renter occupied. The vast majority of owner-occupied housing units within the County are single-family detached units (70.8%). Most renter-occupied housing units within the County are units with 10 or more apartments (30.4%) and closely followed by single-family detached units (approximately 30.2%).

The percent of rental units by Block Group can be seen on the Rental Units map (Appendix A). Municipalities in the western half of the county show the greatest percentage of renter-occupied housing units, with most municipalities displaying areas with percentages as great as 41% or higher. This is also the area with a high number of low- and moderate-income households, suggesting that homeownership is not a viable option for some residents of this area.

As shown in **Table 12**, data from the 2018-2022 ACS shows that roughly 110,000 or more than 67% of all residential properties within Manatee County are single units. Single-unit properties are either detached structures (97,949 or 60.6%) or attached structures (11,291 or 7.0%). Residential properties are further categorized into properties within 2-4 unit structures, properties within 5-9 unit structures, and properties within 10 or more unit structures. These categories comprise over 85% of the County's housing stock. The remaining 11.6% of residential properties in the County are classified as mobile home, boat, RV, van, etc., making up a significant number of homes within the County.

TABLE 12: ALL RESIDENTIAL PROPERTIES BY NUMBER OF UNITS

Property Type	Number	%
1-unit detached structure	97,949	60.6%
1-unit, attached structure	11,291	7.0%
2-4 units	9,186	5.7%
5-9 units	6,474	4.0%
10 or more units	18,078	11.2%
Mobile Home, boat, RV, van, etc.	18,678	11.6%
Total	161,656	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

As shown in **Table 13**, there are an estimated 161,656 total occupied housing units within the County. Of this total, 121,011 or 74.9% are owner-occupied and 40,645 or 25.1% are renter-occupied. Of all owner-occupied units, most contain 2 or 3 bedrooms (76%). Only a small number of owner-occupied units have 1 bedroom (4%) or are without bedrooms (0.4%). Of all renter-occupied units, most contain 2 or 3 bedrooms (73%). In contrast to owner-occupied units, a significant percentage of renter-occupied units have 1 bedroom (18%) and a small percentage of renter-occupied units are without bedrooms (3%).

TABLE 13: UNIT SIZE BY TENURE

	Owners		Renters	
	Number	%	Number	%
No bedroom	454	0.4%	1,343	3.3%
1 bedroom	4,928	4.1%	7,299	18.0%
2 or 3 bedrooms	91,615	75.7%	29,719	73.1%
4 or more bedrooms	24,014	19.8%	2,284	5.6%
Total	121,011	100%	40,645	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Number of Households and Types

Table 14 shows the number and type of households by HUD Adjusted Median Family Income (HAMFI). The default data source is the 2013-2018 CHAS database, developed by HUD. The highest number of households is in the greater than 100% HAMFI group with 60,575 households.

The second highest is the >50-80% HAMFI group (19,465). Over 10,000 households (11,230) or approximately 9.5% of all households in Manatee County earn below 30% of HAMFI. This is an improvement from the County's previous Five-Year Consolidated Plan, which estimated that about 19% of all households in Manatee County earned below 30% of HAMFI.

Small family households are households that have a family with two to four members. The highest number of small family households is within the >100% HAMFI group (25,140). The second-highest number of small family households is within the >50-80% HAMFI group (5,308). Over 2,500 households (2,528) or approximately 6% of small family households in Manatee County earn below 30% of HAMFI.

Large family households are households that have a family of five or more members. Again, the highest number of large family households is within the >100% HAMFI group (3,288). The second-highest number of large family households is within the >50-80% HAMFI group (1,184). There are 608 households, or approximately 9% of large family households, in Manatee County that earn below 30% of HAMFI.

Table 14 also provides data on households that contain at least one person considered to be elderly. The data suggest that among income groups, the largest number of households with a person 62-74 years of age is within the >100% HAMFI income group (20,640). The largest number of households with a person 75 years or older is also within the >100% HAMFI income group (8,968). About 5,553 households contain at least one person 62 years or older and earn below 30% of HAMFI. In total, 60,029 households contain at least one person 62 years of age or older, which represents an increase of 19.5% in elderly population since estimates from 2008-2012 CHAS data.

Finally, data provided **Table 14** shows the number of households with one or more children 6 years old or younger. Among the household income groups identified, the highest number of households with children 6 years or younger is within the 100% HAMFI income category (5,410). The second highest number of households with children 6 years old or younger is within the >50-80% HAMFI group (2,272).

Approximately 1,344 households have at least one child 6 years old or younger and earn below 30% of HAMFI. In total, 12,198 households have at least one child 6 years old or younger.

TABLE 14: TOTAL HOUSEHOLDS

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	11,230	13,940	19,465	11,890	60,575
Small Family Households *	2,528	3,290	5,308	3,894	25,140
Large Family Households *	608	745	1,184	719	3,288
Household contains at least one person 62-74 years of age	3,403	3,865	5,970	3,544	20,640
Household contains at least one person age 75 or older	2,150	4,109	4,792	2,588	8,968
Households with one or more children 6 years old or younger *	1,344	1,743	2,272	1,429	5,410

Data Source: HUD IDIS Output, January 2023: 2013-2018 CHAS

* the highest income category for these family types is >80% HAMFI

Value of Units

The costs of housing trends for Manatee County are displayed in **Table 15**. According to the 2018-2022 ACS, the current median home value for Manatee County is estimated to be \$323,900. This figure represents a 92% increase from the 2011-2015 ACS median home value of \$169,000.

Between the 2011-2015 ACS and the 2018-2022 ACS, the estimated median contract rent within the County increased by 55%, from \$814 to \$1,259. The distribution of estimated rents paid within Manatee County is detailed in **Table 16**, according to 2018-2022 ACS data. Of all 40,645 rental units within the County, over half (52.6%) have a rent between \$500 and \$1,499. Few rental units have a rent less than \$500 (3.3%). Approximately 44.1% of rental units have rent over \$1,499.

TABLE 15: HOUSING VALUE TRENDS

	Base Year: 2015	Most Recent Year: 2022	% Change
Median Home Value	\$169,000	\$323,900	92%
Median Contract Rent	\$814	\$1,259	55%

Data Source: 2011-2015 American Community Survey 5-Year Estimates; 2018-2022 American Community Survey 5-Year Estimates

TABLE 16: ESTIMATED RENT

Rent Paid	Number	%
Less than \$500	1,291	3.2%
\$500-999	5,338	13.1%
\$1,000-1,499	15,185	37.4%
\$1,500-1,999	10,244	25.2%
\$2,000 or more	6,964	17.1%
No rent paid	1,623	4.0%
Total	40,645	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the County constructed prior to 1970 may be approaching the end of their utility.

Table 17 identifies the age of year-round residential structures. Of the 121,011 owner-occupied housing units, the majority (69.2%) were built after 1980. The remaining 30.8% were built before 1980. Of the 40,645 renter-occupied housing units, the majority were built after 1980 (60.6%). Nearly 30% were built 2000 or later, and 10.3% of renter-occupied units were built before 1960.

TABLE 17: YEAR UNIT BUILT

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	48,590	40.2%	12,096	29.8%
1980-1999	35,121	29.0%	12,519	30.8%
1960-1979	26,487	21.9%	11,850	29.2%
Before 1960	10,813	8.9%	4,180	10.3%
Total	121,011	100%	40,645	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Condition of Housing

Table 18 shows the condition of occupied housing units within Manatee County, with a breakdown of owner-occupied units and renter-occupied units. As defined by HUD, a housing “condition” includes the following:

- A housing unit that lacks complete plumbing facilities
- A housing unit that lacks complete kitchen facilities
- A housing unit with more than one person per room
- A housing unit with a cost burden greater than 30% of the occupant’s household income

According to 2018-2022 ACS data, the majority (76%) of owner-occupied housing units have no housing conditions. Of the remaining owner-occupied housing units, a significant number feature one housing condition (23%). Less than 1% have two housing conditions and three or more housing conditions.

Of the estimated 40,645 renter-occupied housing units in the County, half (50%) have one housing condition. Nearly half (46%) of renter-occupied units have no housing conditions. Only 4% of renter-occupied units have two housing conditions. No renter-occupied housing units have three or more housing conditions.

TABLE 18: CONDITION OF UNITS

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	28,155	23.27%	20,224	49.76%
With two selected Conditions	663	0.55%	1,660	4.08%
With three selected Conditions	41	0.03%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	92,152	76.15%	18,761	46.16%
Total	121,011	100%	40,645	100%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Risk of Lead-Based Paint

The risk of lead-based paint hazards within Manatee County is estimated in **Table 19**. Because the actual number of housing units in the County with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. Therefore, the table shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for this table is from the 2018-2022 ACS 5-Year Estimates and 2013-2018 CHAS.

As shown in **Table 19**, over 31% of owner-occupied housing units in the County were built prior to 1980, while about 7% were built before 1980 and have children present. For renter-occupied housing units, nearly 40% were built prior to 1980, while about 13% were built prior to 1980 and have children present. Although there is a high percentage of housing units built before 1980, signifying a higher risk of lead-based paint, there is a low percentage of older housing units with children present. A slightly higher percentage of older housing units with children present are occupied by renters.

TABLE 19: RISK OF LEAD-BASED PAINT HAZARD

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	37,300	30.8%	16,030	39.4%
Housing Units built before 1980 with children present	8,389	7.2%	5,152	12.9%

Data Source: 2018-2022 American Community Survey 5-Year Estimates (Total Units); 2013-2018 CHAS (Units with Children present); HUD IDIS Output, January 2023; 2013-2018 CHAS

Housing Problems

Table 20 displays the number of households with housing problems by tenure and HUD Adjusted Median Family Income (HAMFI) according to the 2013-2018 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities
- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

As shown in **Table 20**, among the “housing problem” categories, households within Manatee County are most commonly impacted by severe housing cost burden (greater than 50% of income) and housing cost burden (greater than 30% of income).

The first housing problem, substandard housing, is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. There are 293 renter households and 138 owner households that live in substandard housing.

The second housing problem identified is households living in overcrowded conditions. There are two forms of overcrowding defined by HUD and identified in **Table 20**:

1. Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
2. Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms

As shown in **Table 20**, 1,263 renter households are experiencing some form of overcrowding, while 526 owner-occupied households are experiencing some form of overcrowding.

Another housing problem identified is cost burden. Cost burden is a fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Severe housing cost burden greater than 50% of income
- Housing cost burden greater than 30% of income

As shown in **Table 20**, approximately 3,143 renter households within the 0-30% AMI group are experiencing severe cost burden (>50% of income). In total, among all income groups, 13,042 renters have a cost burden greater than 30% of income and 15,252 owners have a cost burden greater than 30% of income. Approximately 8,000 owner households (7,902) have a cost burden greater than 50% of income and about 6,537 renter households have a cost burden greater than 50% of income.

Overall, 13,855 households in Manatee County are experiencing a cost burden >30%-50% of income and 14,439 households are experiencing a cost burden greater than 50% of income. Owners appear to be more affected by the cost of housing within the Manatee County. Of the 28,294 households experiencing a cost burden of some kind, 13,042 (46.1%) are renters and 15,252 (53.9%) are owners.

The final category is "zero/negative income (and none of the above problems)". Zero/Negative income is defined as a household whose net income is zero or in the negative. Approximately 709 renter households and 1,224 owner households are experiencing zero/negative income.

TABLE 20: HOUSING PROBLEMS TABLE (HOUSEHOLDS WITH ONE OF THE LISTED NEEDS)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	63	150	45	35	293	29	45	44	20	138
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	60	59	55	45	219	0	34	45	34	113
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	440	210	259	135	1,044	70	94	174	75	413
Housing cost burden greater than 50% of income (and none of the above problems)	3,143	2,630	744	20	6,537	2,984	2,380	1,900	638	7,902
Housing cost burden > 30%-50% of income (and none of the above problems)	309	1,994	3,080	1,122	6,505	860	2,029	29,83	1,478	7,350
Zero/negative Income (and none of the above problems)	709	0	0	0	709	1,224	0	0	0	1,224

Data Source: HUD IDIS Output, January 2023: 2013-2018 CHAS

Table 21 displays the number of households with no housing problems, one or more housing problems, and negative income by tenure and HUD Area Median Income (AMI). The Default Data Source is the 2013-2018 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data reveals in **Table 21**, renters in the 0-30% AMI group experience the highest occurrence of one or more of the four housing problems when compared to other income groups. Approximately 3,709 renter households in the 0-30% AMI group have one or more of the four housing problems. In slight contrast, a total of 3,084 renter households below 30% AMI experience some form of housing problem. Additionally, 709 renter households and 1,224 owner households within the 0-30% AMI group have negative income but none of the other four identified housing problems.

TABLE 21: HOUSING PROBLEMS 2 (HOUSEHOLDS WITH ONE OR MORE SEVERE HOUSING PROBLEMS: LACKS KITCHEN OR COMPLETE PLUMBING, SEVERE OVERCROWDING, SEVERE COST BURDEN)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	3,709	3,055	1,104	235	8,103	3,084	2,565	2,175	769	8,593
Having none of four housing problems	749	2,649	4,860	3,174	11,432	1,744	5,670	11,350	7,720	26,484
Household has negative income, but none of the other housing problems	709	0	0	0	709	1,224	0	0	0	1,224

Data Source: HUD IDIS Output, January 2023: 2013-2018 CHAS

The population and number of households living in Manatee County has increased dramatically over the last 20 years (38.9%). The median income has also increased during this period (76.3%). Over a third (31.5%) of the County's households earn less than 80% HAMFI and approximately 10.6% of the County's households earn less than 30% HAMFI. Low- and moderate- income populations continue to experience higher rates of housing problems, such as housing cost burden and overcrowding. As a result, these populations have an increased risk of homelessness.

Vacancy Status

According to 2018-2022 ACS data, there are a total of 208,358 housing units within Manatee County. Of these, 46,702 or 22% are vacant. As defined in the ACS, a housing unit is vacant if no one is living in it at the time of interview. Units occupied at the time of interview entirely by persons who are staying two months or less and who have a more permanent residence elsewhere are considered to be temporarily occupied and are classified as "vacant." Assuming that 33.0% of the County's occupied housing units were built before 1980 based on **Table 17**; at least 15,412 vacant housing units may be suitable for rehabilitation as shown in **Table 22**. There is no data available for abandoned units.

TABLE 22: VACANT UNITS

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	15,412	31,290	46,702
Abandoned Vacant Units	N/A	N/A	N/A
Real-Estate Owned (REO) Properties	N/A	N/A	N/A
Abandoned REO Properties	N/A	N/A	N/A

Data Source: 2018-2022 ACS (Vacant Units); RealtyTrac.com. Manatee County, FL. Date accessed: June 2023

Minority Housing Profile

TABLE 23: GREATER NEED: HOUSING COST BURDENS AMI

Housing Cost Burden	No Cost Burden (<=30%)		Cost Burden (30-50%)		Severe Cost Burden (>50%)		No / Negative Income		Total Households
	Total	%	Total	%	Total	%	Total	%	
Jurisdiction as a whole	80,655	68.9%	18,572	15.9%	15,880	13.6%	1,970	1.7%	117,077
White	69,534	71.6%	14,150	14.6%	12,060	12.4%	1,404	1.4%	97,148
Black / African American	2,729	46.0%	1,685	28.4%	1,249	21.0%	275	4.6%	5,938
Asian	1,474	76.3%	185	9.6%	232	12.0%	40	2.1%	1,931
American Indian, Alaska Native	254	79.9%	45	14.2%	19	6.0%	0	0.0%	318
Pacific Islander	20	40.8%	25	51.0%	4	8.2%	0	0.0%	49
Hispanic	5,992	56.1%	2,313	21.7%	2,135	20.0%	240	2.2%	10,680

Data Source: HUD IDIS Output, January 2023: 2013-2018 CHAS

Within Manatee County, 68.9% of households do not presently experience cost burden, while 15.9% experience cost burden, 13.6% experience severe cost burden and nearly 2% have no/negative income. Overall, 29.5% of households are either cost burdened or severely cost burdened.

Of all households within the County, 15.9% are cost burdened (30-50%). Black/African American households experiences a cost burden at a greater rate (10 percentage points higher or more) than the jurisdiction as a whole at 28.4%. Pacific Islanders are also cost burdened at a disproportionate rate (51.0%) when compared to the jurisdiction as a whole, indicating a disproportionate need for assistance within these groups.

Of all households within the County, 13.6% experience severe cost burden (>50%). No particular household group experiences severe cost burden at disproportionate rate from the jurisdiction as a whole.

Approximately 2% of households have no/negative income. No race or ethnicity experiences no/negative income at a greater rate (10 percentage points higher or more) than the jurisdiction as a whole.

Disproportionate Housing Needs in Urban County

Table 24 shows the disproportionate housing needs for Manatee County Urban County. 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

On average, 32% of households in Manatee County Urban County experience any one of four housing problems. As shown, over half (52%) of Hispanic households and 50% of Black, Non-Hispanic households in Manatee County Urban County experience housing problems.

In both Manatee County Urban County and the greater North Port-Sarasota-Bradenton Metropolitan Statistical Area (MSA), the occurrence of housing problems is greater in non-family households and households with five or more people. In Manatee County Urban County, severe housing problems are least prevalent in Native American, Non-Hispanic, while in the greater North Port-Sarasota-Bradenton Region, severe housing problems are least prevalent in White, Non-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 24**, disproportionate housing needs may exist for households in the Hispanic, Black, Non-Hispanic, and Other, Non-Hispanic racial groups.

TABLE 24: DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS (MANATEE COUNTY CDBG) JURISDICTION

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	27,225	93,505	29.12%
Black, Non-Hispanic	2,780	5,566	49.95%
Hispanic	5,481	10,410	52.65%
Asian or Pacific Islander, Non-Hispanic	442	1,798	24.58%
Native American, Non-Hispanic	64	269	23.79%
Other, Non-Hispanic	488	1,035	47.15%
Total	36,505	112,665	32.40%
Household Type and Size			
Family households, <5 people	17,146	68,955	24.87%
Family households, 5+ people	3,499	7,263	48.18%
Non-family households	15,830	36,377	43.52%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	12,878	93,505	13.77%
Black, Non-Hispanic	1,325	5,566	23.81%
Hispanic	3,260	10,410	31.32%
Asian or Pacific Islander, Non-Hispanic	263	1,798	14.63%
Native American, Non-Hispanic	29	269	10.78%
Other, Non-Hispanic	289	1,035	27.92%
Total	18,110	112,665	16.07%

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%.

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

Cost Burden in Urban County

Table 25 shows the severe housing cost burden for Manatee County Urban County. 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, 26% of Other, Non-Hispanic households experience severe housing cost burden. Hispanic households (22%) and Black, Non-Hispanic households (21%) also have a higher percentage of households with severe housing cost burden. These percentages are similar for the greater North Port-Sarasota-Bradenton MSA.

In both Manatee County Urban County and the region, the occurrence of severe housing cost burden is greatest in non-family households. Large households (5 or more people) have slightly larger percentages of severe cost burden than small households (less than 5 people). Based on the data provided in **Table 25**, disproportionate severe housing cost burden may exist for Other, Non-Hispanic households. Non-

family are more cost burdened than small households (less than 5 people) and large households (5 or more people).

TABLE 25: DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN

Households with Severe Housing Cost Burden		Manatee County CDBG Jurisdiction (Urban County)	
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	11,825	93,505	12.65%
Black, Non-Hispanic	1,168	5,566	20.98%
Hispanic	2,301	10,410	22.10%
Asian or Pacific Islander, Non-Hispanic	215	1,798	11.96%
Native American, Non-Hispanic	29	269	10.78%
Other, Non-Hispanic	264	1,035	25.51%
Total	15,802	112,665	14.03%
Household Type and Size	# with severe cost burden	# households	% with severe cost burden
Family households, <5 people	6,921	68,955	10.04%
Family households, 5+ people	935	7,263	12.87%
Non-family households	7,870	36,377	21.63%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

3.3 ECONOMIC PROFILE

Per Capita Income/Median Income/Income and Poverty

According to the 2018-2022 ACS, Manatee County has a median family income of \$88,147 per year, median household income of \$71,385, with 6.5% of families falling below the federal poverty level and 10.2% of individuals falling below the federal poverty level. **Table 26** shows Manatee County has a higher median family and household income compared to the State of Florida along with a lower poverty rate.

TABLE 26: INCOME AND POVERTY 2018-2022

Place	Median Household Income	Median Family Income	Per Capita Income	% Families Below Poverty Level	% Individuals Below Poverty Level
Manatee County	\$71,385	\$88,147	\$41,760	6.5%	10.2%
Florida	\$67,917	\$81,514	\$38,850	9.1%	12.9%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

According to the 2018-2022 ACS 5-Year Estimates, Manatee County reported that approximately 10.2% of individuals were living below the federal poverty level. This is nearly 3% lower than the rate of

individuals living below the poverty level for the State. The State of Florida reported approximately 12.9% of individuals were living below the federal poverty level. **Table 27** illustrates the breakdown between race and poverty level in Manatee County, according to the 2018-2022 ACS 5-Year Estimates, provided by the U.S. Census Bureau. Native Hawaiian and Other Pacific Islanders hold the highest percentage rate of persons living below the federal poverty level at 36.3%; this is followed by Hispanic or Latino persons at 17.1%.

The western part of the County shows a greater rate of poverty as seen in the Poverty Status map (Appendix A). The City of Bradenton (and the area immediately surrounding it) and the City of Palmetto have the highest rate of people whose income in the past 12 months is below the poverty level with Census Tracts registering a poverty rate 21% or higher. The same regions that displayed the highest levels of poverty in the Poverty Status map are also the places with the higher percentages of poverty on the Poverty Status for Minority Populations map (Appendix A). This suggests that while most of the County does not suffer from poverty, those who suffer the most are minority populations.

The Low- and Moderate-Income Persons map (Appendix A), indicates that the highest concentrations of low- and moderate-income persons are concentrated to the southern part of the County. A low- and moderate-income person earns less than 80% of the Area Median Income (AMI). Manatee County reviews statistical information on an annual basis for all areas that have been determined to have at least 51% of its population low- and moderate-income (80% of the Area Median Income). Currently there are 81 Block Groups that meet or exceed these criteria in the County.

These identified areas are mainly concentrated in the City of Bradenton (and the area immediately surrounding it) and the City of Palmetto. Some low- and moderate-income areas are scattered throughout the coastal communities of the County. Generally, these same neighborhoods have the highest percentage of minority populations in the County. The low- and moderate-income areas are consistent with places that have higher poverty rates and a higher percentage of minority populations.

TABLE 27: RACE AND POVERTY

Race and Hispanic Origin	Below Poverty Level	Percent Below Poverty Level
One Race	36,558	9.1%
White	27,462	8.8%
Black or African American	5,367	16.7%
American Indian and Alaska Native	110	8.1%
Asian	1,478	16.8%
Native Hawaiian and Other Pacific Islander	57	36.3%
Some Other Race	2084	16.5%
Two or More Races	4,112	13.0%
Hispanic or Latino Origin	11,576	17.1%
White Alone, Not Hispanic or Latino	20,543	7.4%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Employment by Sector

Table 28 displays employment by occupation sectors within Manatee County, according to the 2018-2022 ACS 5-year estimates. Management, business, science, and arts occupations account for the largest number of occupations with 66,542 people. Service and sales and office occupations are also well-represented. The least represented sector in Manatee County is natural resources, construction, and maintenance occupations. Of these occupations, median earnings are highest in the management, business, science, and arts occupations (\$60,424), whereas median earnings are lowest in service occupations (\$26,229).

TABLE 28: EMPLOYMENT BY SECTOR

Employment by Occupation	Number of People*	Median Earnings (\$)
Management, business, science, and arts occupations	66,542	\$60,424
Service occupations	33,226	\$26,229
Sales and office occupations	40,444	\$36,699
Natural resources, construction, and maintenance occupations	16,274	\$40,553
Production, transportation, and material moving occupations	18,505	\$32,411
Total	174,991	

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Employment by Industry

Information provided in **Table 29** identifies employment within Manatee County by industry. This information is divided into 13 sectors by number of workers, number of jobs, and the ratio of workers to jobs by industry. According to the 2018-2022 ACS 5-year estimates, there are 174,991 workers within Manatee County. The number of jobs among all industries is estimated to be 128,735 according to the 2020 Longitudinal Employer-Household Dynamics data published by the U.S. Census Bureau.

Educational services, and health care and social assistance (22%) represent the largest share of workers in the County, followed by employees in retail trade (14%) and professional, scientific, and management, and administrative and waste management services (13%). Workers in agriculture, forestry, fishing and hunting, and mining (1%) and information (1%) comprise the smallest percentage of workers.

Regarding the share of jobs, the largest share of jobs is within educational services, and health care and social assistance (22%). Jobs in retail trade (13%), arts, entertainment, and recreation, and accommodation and food services (13%), and professional, scientific, and management, and administrative and waste management services (12%) are also well-represented. Wholesale trade (3%) and information (1%) account for the smallest percentages of jobs.

By subtracting share of jobs by share of workers, employment deficiencies by industry are shown. This calculation will heretofore be known as “worker deficiencies.” A negative value reflects an oversupply of labor for the sector. As **Table 29** shows, within Manatee County there are fewer jobs than workers

within seven (7) industries: manufacturing; retail trade; transportation and warehousing, and utilities; information; finance and insurance, and real estate and rental and leasing; professional, scientific, and management, and administrative and waste management services; and other services, except public administration. This means that workers in these business sectors may have more difficulty finding a job that matches their skillset. In contrast, there may be more jobs than workers in five (5) business sectors: agriculture, forestry, fishing and hunting, and mining; construction; wholesale trade; educational services, and health care and social assistance; arts, entertainment, and recreation, and accommodation and food services; and public administration. These are estimates of sectors that may have more jobs than workers, though the data currently shows there are fewer jobs than workers in Manatee County and the only sector with an oversupply of jobs is agriculture, forestry, fishing and hunting, and mining. However, for sectors with an oversupply of jobs, workers from outside Manatee County may be meeting the needs of the local job market for these sectors.

TABLE 29: EMPLOYMENT BY INDUSTRY

Employment by Industry	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Worker Deficiencies
			%	%	%
Agriculture, forestry, fishing and hunting, and mining	1,349	4,768	0.8%	3.7%	2.9%
Construction	15,043	12,037	8.6%	9.4%	0.8%
Manufacturing	12,144	8,756	6.9%	6.8%	-0.1%
Wholesale trade	4,276	4,461	2.4%	3.5%	1.0%
Retail trade	24,063	17,216	13.8%	13.4%	-0.4%
Transportation and warehousing, and utilities	8,191	4,152	4.7%	3.2%	-1.5%
Information	2,502	1,084	1.4%	0.8%	-0.6%
Finance and insurance, and real estate and rental and leasing	12,354	5,916	7.1%	4.6%	-2.5%
Professional, scientific, and management, and administrative and waste management services	22,642	15,386	12.9%	12.0%	-1.0%
Educational services, and health care and social assistance	37,647	28,283	21.5%	22.0%	0.5%
Arts, entertainment, and recreation, and accommodation and food services	18,859	16,691	10.8%	13.0%	2.2%
Other services, except public administration	8,816	4,379	5.0%	3.4%	-1.6%
Public administration	7,105	5,606	4.1%	4.4%	0.3%
Total	174,991	128,735	100%	100%	N/A

Data Source: 2018-2022 American Community Survey 5-Year Estimates

4.0 STATUTORY AND REGULATORY POLICIES

In order to affirmatively further Fair Housing, Manatee County must recognize barriers to Fair Housing choice and provide actions to increase choice. An analysis of isolation and integration across the County helps to identify areas where these barriers may exist. Residential isolation produces damaging socioeconomic outcomes for minority and low-income groups. Housing patterns across the United States, and Manatee County, continue to show lasting areas of separation for certain races and income groups. The social and public policies of our past, like Jim Crow laws and Federal Housing Administration's early redlining policies, brought about much of the segregation in housing that is still seen today. More recent trends in residential isolation are generally attributed to suburbanization, discrimination, and personal preferences.

An analysis of historical U.S. Census Bureau data by researchers at Harvard and Duke Universities for the Manhattan Institute for Policy Research, indicates that racial separation has diminished since the 1960s. The report, published by the Manhattan Institute for Policy Research, indicates that the separation of Black/African American residents from other races is now lower than the national average from 1970. In addition, separation continued to drop over the last decade. The Manhattan Institute published "The End of the Segregated Century: Racial Separation in American's Neighborhoods, 1890- 2010" which indicated that 522 out of 658 housing markets recorded a decline in segregation.

Despite recent trends in integration, Black/African American households remain the most isolated racial group and are in fact hyper-separated in many of the largest metropolitan areas, including Baltimore, Chicago, Cleveland, Detroit, Houston, Los Angeles, New Orleans, New York, Philadelphia and Washington, D.C. according to "A Right to Housing: Foundation for a New Social Agenda" published by Temple University. Hispanics are the second most isolated racial group, primarily in northern metropolitan areas.

Patterns for income segregation are derived from the National Survey of America's Families, the Census and Home Mortgage Disclosure Act data, which indicate income segregation grew between 1970 and 1990. Poor families are becoming more isolated. Whereas in 1970 only 14 percent of poor families lived in predominantly poor areas, this number increased to 28 percent in 1990 and continues to rise according to the Urban Institute who published "Residential Segregation and Low-Income Working Families." Current trends in racial and income based residential isolation are attributed to several factors, including:

A. Exclusionary zoning and land use practices

The "separate but equal" laws established in the early part of the 20th Century specified exclusively Black/African American, White/Caucasian and mixed districts and legally established segregation in housing opportunities. Many cities, particularly in the South and mid-South, developed and adopted racial zonings between 1910 and 1915. By 1917, the Supreme Court ruled that racial zoning was illegal, but many local governments continued to enforce racial

segregation through alternative land use designations. While these actions occurred a century ago, the impact is still felt because of their significant influence on settlement patterns.

Today, many jurisdictions adopt land-use zoning regulations such as large-lot zoning, minimum house size requirements, and bans on secondary units which make housing more expensive. The result is often the exclusion of lower income households from certain communities and/or neighborhoods.

B. Discriminatory homeownership practices

Discriminatory homeownership practices include redlining and steering. In 1944, the Federal Housing Administration adopted maps developed by the federally created Home Owners' Loan Corporation that coded areas as "credit-worthy" based on race and the age of the housing stock. These maps, called Residential Security Maps, established and sanctioned "redlining." It became common practice for banks to deny residents in predominately minority neighborhoods long-term mortgages because they lived in redlined areas.

The United States Supreme Court defines steering as a "practice by which real estate brokers and agents preserve and encourage patterns of racial segregation by either steering members of racial and ethnic groups to certain neighborhoods occupied by similar groups and away from neighborhoods inhabited primarily by members of other races or groups." Essentially, real estate agents "steer" people of color toward neighborhoods of color, while White/Caucasian homebuyers are directed to primarily White/Caucasian neighborhoods, continually reinforcing separation and isolation. The Fair Housing Act made discrimination in housing illegal. However, there is a belief that steering is still common. For example, some real estate agents may indirectly and possibly unknowingly steer families through using language such as "ethnic mix" or "multicultural."

C. Attitudes and preferences towards housing location

Residential preferences of persons of color may, in some instances, be categorized by social-psychological and socioeconomic demographic characteristics. The theory behind social-psychological residential preference is that separation is a result of persons of color choosing to live together because of cultural similarities, maintaining a sense of racial pride, or a desire to avoid living near other groups because of fear of racial hostility. Other theories suggest demographic and socioeconomic factors such as age, gender and social class influence residential choice more than race. Evidence explaining these assumptions are generally limited and anecdotal in nature [Farley, Reynolds; Fielding, Elaine L.; Krysan, Maria (1997). "The residential preferences of blacks and whites: A four-metropolis analysis". Housing Policy Debate 8 (4): 763–800].

Data suggests that foreign-born Hispanics, Asians, and Black/African Americans often have higher rates of isolation than do native-born individuals from these same groups. Separation of immigrants is generally associated with language barriers. Support networks often exist in these

enclaves to assist with linguistic isolation. Research on assimilation shows that while new immigrants settle in homogenous ethnic communities, isolation declines as they gain socioeconomic status and move away from these communities, integrating with the native-born. This provides some support to the idea that socioeconomic status plays a significant role in housing choice, possibly more than race.

D. Location of Public Housing

Racial separation in public housing occurs when high concentrations of a certain minority group occupy one specific public housing development. Income segregation occurs when high concentrations of public housing are located in one specific area of a community or region. Of the 310 public housing units constructed by the Public Works Administration and the U.S. Housing Authority before World War II, 279 were segregated by race. After World War II, antidiscrimination laws were passed which made segregated public housing illegal. However, the historical pattern was set.

In addition, most of the housing projects built between 1932 and 1963 were located primarily in “slum” areas and vacant industrial sites according to the Urban Land Institute (ULI), which published “Residential Segregation and Low-Income Working Families.” This trend continued between 1964 and 1992, when most projects were located in the older parts of core cities that were considered low income. Due to these practices, public housing is concentrated, increasing the density of low-income families in certain parts of communities.

E. Gentrification

Gentrification is another form of residential separation, generally by class or economic status, and is defined by new higher income residents displacing lower income residents in emerging urban neighborhoods. The most commonly held belief about gentrification is that residential turnover of an area is from one that is predominantly residents of color, to one that is populated by higher income White/Caucasians. However, definitions of gentrification do not typically mention this racial component.

F. Federal Highway Policies

The Federal Highway Act of 1956 authorized the construction of interstate and highway systems throughout the United States, cutting through many metropolitan areas and cities. The result was the splitting of communities either by segregating one group from another or by running the new road system through the middle of a minority community. The impacts of the highway system are still felt today, especially in areas of New York City (e.g., the Bronx), Tampa (e.g., Tampa Heights, Seminole Heights, and Hyde Park), and more. The physical separation of people from places and connectivity has further segregated many groups and populations, while contributing to the systemically racist policies that remain pervasive in this country.

Integration and Isolation in Manatee County

Areas of racial integration and isolation can be found in the Manatee County (reference Population Density by Race/Ethnicity map – Appendix A). The greatest percentage of the County’s population is White, and, among the Urban County municipalities, there is evidence of integration in the cities of Bradenton and Palmetto. However, while there are integrated populations of White, Black, Hispanic, and Other racial and ethnic groups, there is still a strong trend of Black/African American populations residing primarily in communities near the Manatee River while White, Hispanic, and Other racial and ethnic groups tend to be more dispersed throughout the County. Along the beachfront communities, there is a clear divide between minority populations and White populations. Anna Maria, Holmes Beach, Bradenton Beach, and Longboat Key are predominantly White neighborhoods. Evidently, established municipalities within the County have higher concentrations of minority racial and ethnic groups and some degree of integration, while neighborhoods developed later in the County’s history tend to be more isolated and have higher concentrations of White/Caucasian households.

Non-White persons make up 30.2% of the total population of Manatee County. Based on this percentage, an assumption can be made that a Census Tract with at least 30.2% of people that identify as Non-White would be fairly integrated per County averages. Census tracts with percentages much higher or much lower than 30.2% would be considered more isolated for the demographic group that lives in the Census Tract. For example, Census Tract 3.05 has one of the highest percentages of Non-White populations and therefore White/Caucasians are isolated within this neighborhood; this may indicate that minority populations are directed to specific neighborhoods.

HUD defines racial concentration as an area having more than 50 percent Non-White/Caucasian population. Listed in **Table 30** are the Census Tracts within the Manatee County where minority population is greater than 50%.

TABLE 30: CONCENTRATIONS OF MINORITY POPULATIONS BY CENSUS TRACT

Census Tract	Total Population	Total Minority Population	% of Total
All	405,069	122,435	30.2%
1.03	3,488	2,710	77.7%
1.05	4,032	3,020	74.9%
1.06	5,088	3,516	69.1%
3.04	3,939	2,386	60.6%
3.05	7,028	6,008	85.5%
3.07	3,804	2,232	58.7%
7.03	4,226	2,831	67.0%
7.04	6,350	4,629	72.9%
7.05	6,318	4,790	75.8%
15.0	6,530	5,026	77.0%
15.0	6,394	4,286	67.0%

Data Source: 2018-2022 American Community Survey 5-Year Estimates

During the 2018-2022 ACS, residents who identified themselves as Black/African American are the second largest racial group in Manatee County at 8.1%. Based on the assumption that a percentage share similar to the County as a whole would indicate a more integrated Census Tract in Manatee County, Census Tracts 3.07 (8.4%), 20.1 (8.8%), and 19.1 (9.2%) are the closest to the 8.1% total population share.

Table 31 shows all Census Tracts in Manatee County disproportionately higher than the County average percentage of Black/African American population (anything 10% greater than the average County share, or higher than 8.1%). The most important observation gathered from **Table 31** is the high concentrations of Black/African Americans in Census Tracts 1.03, 7.05, 15.0, and 7.03. As indicated earlier in this report, these neighborhoods are hyper-separated as defined by the book “A Right to Housing: Foundation for a New Social Agenda” (Temple University Press). This can be viewed graphically on the Black/African American Population map located in the Appendix of this report. The following table displays a select group of Census Tracts that are closest to and farthest from the total percentage Black or African American population within the County.

TABLE 31: BLACK/AFRICAN AMERICAN POPULATION BY CENSUS TRACT

Census Tract	Total Population	Total Black/African American Population	% of Total
All	405,069	32,860	8.1%
1.03	3,488	1,532	43.9%
1.05	4,032	835	20.7%
1.06	5,088	820	16.1%
3.04	3,939	1,117	28.4%
3.05	7,028	1,357	19.3%
3.07	3,804	320	8.4%
3.09	4,432	495	11.2%
3.11	2,111	307	14.5%
6.03	4,457	517	11.6%
6.04	3,884	555	14.3%
7.03	4,226	1,252	29.6%
7.04	6,350	1,442	22.7%
7.05	6,318	2,687	42.5%
8.11	3,738	540	14.4%
8.12	5,169	732	14.2%
9.01	5,719	783	13.7%
11.0	3,721	576	15.5%
15.0	6,394	2,268	35.5%
16.0	4,149	412	9.9%
16.0	4,771	1,021	21.4%
19.0	6,451	690	10.7%
19.1	7,851	725	9.2%
20.1	3,799	335	8.8%
<i>Census Tracts with the highest concentration of Black/African American population</i>			

Data Source: 2018-2022 American Community Survey 5-Year Estimates

Table 32 shows all Census Tracts in Manatee County disproportionately higher than the County average percentage of Hispanic/Latino population (anything 10% greater than the County average share, or higher than 12.8%). As evidenced in **Table 32** below, Census Tracts 1.05, 1.06, and 3.05 have the highest concentrations of Hispanic or Latino population within the County.

TABLE 32: HISPANIC/LATINO POPULATION BY CENSUS TRACT

Census Tract	Total Population	Total Hispanic/Latino Population	% of Total
All	405,069	68,333	16.9%
1.03	3,488	902	25.9%
1.05	4,032	2,143	53.1%
1.06	5,088	2,655	52.2%
3.05	7,028	4,594	65.4%
3.07	3,804	1,835	48.2%
3.09	4,432	1,347	30.4%
3.10	3,852	1,519	39.4%
3.12	1,808	393	21.7%
3.14	2,375	705	29.7%
5.01	2,818	561	19.9%
6.01	2,998	727	24.2%
6.03	4,457	1,460	32.8%
6.04	3,884	708	18.2%
7.03	4,226	1,509	35.7%
7.04	6,350	3,006	47.3%
7.05	6,318	1,918	30.4%
8.05	7,836	1,475	18.8%
8.11	3,738	884	23.6%
8.12	5,169	958	18.5%
9.02	5,566	995	17.9%
10.0	2,564	519	20.2%
10.0	2,734	527	19.3%
11.0	3,877	665	17.2%
11.0	4,127	1,554	37.7%
13;	3,822	686	17.9%
14.0	3,945	754	19.1%
14.0	2,442	639	26.2%
15.0	6,530	1,765	27.0%
15.0	6,394	2,033	31.8%
19.0	8,737	3,193	36.5%
20.1	3,799	862	22.7%
<i>Census Tracts with the highest concentration of Hispanic/Latino population</i>			

Data Source: 2018-2022 American Community Survey 5-Year Estimates

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 33(A)**, demonstrates the general relationship between dissimilarity index values and the level of segregation.

TABLE 33(A): DISSIMILARITY INDEX

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

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

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.

According to **Table 33(B)** and the most recent available data (updated July 10, 2020), Manatee County's CDBG Jurisdiction (Urban County) currently experiences low to moderate segregation between different racial and ethnic groups. The Black/White dissimilarity index is the highest with a value of 52.81, which is on the border of moderate to high. However, it is important to note that the Black/White dissimilarity index shows a decrease since 1990 when the value was at 67.96.

Table 33(B) shows the dissimilarity index value for Hispanic/White and Asian or Pacific Islander/White have increased between 1990 and today.

TABLE 33(B): RACIAL/ETHNIC DISSIMILARITY TRENDS

(Manatee County CDBG) Jurisdiction				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	51.11	43.51	38	43.41
Black/White	67.96	57.38	46.06	52.81
Hispanic/White	40.14	43.32	42.27	45.52
Asian or Pacific Islander/White	29.62	25.01	25.12	31.69

Data Source: AFFH Data and Mapping Tool, Data Updated July 10, 2020; Accessed March 2024

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

A Racially or Ethnically Concentrated Area of Poverty (R/ECAP) is a HUD-defined 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”.

Data collected from the AFFH Data and Mapping Tool identifies five Census Tracts that HUD defines as a R/ECAP within Manatee County. Census Tract 1.05, 1.06, 3.05, 3.13, and 3.14 are shown on the attached maps as an R/ECAP area as defined by HUD. According to the 2018-2022 ACS 5-Year Estimates, Census Tract 1.05 has a poverty rate of 25.9%, 1.06 (14.6%), 3.05 (15.9%), 3.13 (13.6%), and 3.14 (14.1%) among the entire population.

5.0 PUBLIC & PRIVATE POLICIES, PRACTICES, AND PROCEDURES

5.1 MORTGAGE ACTIVITY

Mortgage Based on Income and Race

Tables 34-38 provide information on mortgage applications and originations based on the Metropolitan Statistical Area (MSA) median income for the area that encompasses North Port-Sarasota-Bradenton, FL. The data is further broken down into categories based on race or ethnicity. In general, a higher percentage and number of loans were provided to applicants with higher incomes, which is not unexpected. The lowest percentage of loans were originated for those people within the <50% of MSA AMI income category. Native Hawaiian/Pacific Islander, Joint ethnicity, and minority groups consistently received a lower percentage of loans originated when compared to other groups, such as the White race or non-Hispanic ethnicity groups.

Of all the racial and ethnic groups in Manatee County, **Table 34** demonstrates that the <50 % MSA AMI group has the lowest overall percentages of loan origination, when compared to higher income groups. The Native Hawaiian/Pacific Islander, and Joint (Hispanic/non-Hispanic) had the lowest percentages of loan origination at 14.3% and 23.6%, respectively. The White and Not Hispanic or Latino racial or ethnic groups had the highest percentage of loans originated at 38.4%, 38.8%, respectively. Most of the other racial/ethnic groups had loan origination percentages in the 30% range.

TABLE 34: INCOME, RACE AND ETHNICITY: < 50% OF MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, VA, and Conventional				
	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's	
American Indian/Alaska Native	28	3,820	7	1,405	25.0%
Asian	109	29,285	35	9,245	32.1%
Black or African American	256	38,430	87	13,925	34.0%
Native Hawaiian/Other Pacific Islander	7	565	1	175	14.3%
White	4,599	825,325	1,767	326,605	38.4%
2 or More Minority Races	9	1,085	3	275	33.3%
Joint (White/Minority Race)	35	7,055	13	2,495	37.1%
Race not Available	1,093	217,715	357	69,705	32.7%
Hispanic or Latino	534	90,430	155	28,195	29.0%
Not Hispanic or Latino	4,456	802,490	1,728	317,730	38.8%
Joint (Hispanic or Latino/Not Hispanic or Latino)	55	11,355	13	3,105	23.6%
Ethnicity Not Available	1,085	217,855	373	74,705	34.4%

Data Source: HMDA Aggregate Report 5 (2022)

Table 35 depicts that for the income group in Manatee County ranging from 50-79% MSA AMI, the Two or More Minority Races group had the highest percentage of loans originated (57.1%), while the Native Hawaiian/Pacific Islander had the lowest origination rate at 33.3%. Again, the White racial or ethnic group maintains a high percentage of loans originated, as does Not Hispanic or Latino groups.

TABLE 35: INCOME, RACE AND ETHNICITY: 50 - 79% OF MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, VA, and Conventional				
	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's	
American Indian/Alaska Native	41	10,135	20	4,860	48.8%
Asian	178	42,110	82	20,180	46.1%
Black or African American	439	92,935	198	42,290	45.1%
Native Hawaiian/Other Pacific Islander	18	3,650	6	1,300	33.3%
White	7,781	1,560,865	4,195	864,255	53.9%
2 or More Minority Races	7	795	4	620	57.1%
Joint (White/Minority Race)	86	17,740	44	9,940	51.2%
Race not Available	1,660	369,640	758	174,330	45.7%
Hispanic or Latino	995	204,555	486	107,740	48.8%
Not Hispanic or Latino	7,478	1,510,790	4,011	830,165	53.6%
Joint (Hispanic or Latino/Not Hispanic or Latino)	173	34,545	76	15,170	43.9%
Ethnicity Not Available	1,561	347,445	733	164,555	47.0%

Data Source: HMDA Aggregate Report 5 (2022)

Table 36 demonstrates that in Manatee County, 60.0% of loans were originated for Two or More Minority Races racial or ethnic groups with an income of 80-99% of MSA AMI. Comparatively, 57.1% of loans were originated for White racial groups. Only 30.0% and 40.0% of loans were originated for individuals in the American Indian/Alaska Native and Native Hawaiian/Pacific Islander racial or ethnic groups, respectively.

TABLE 36: INCOME, RACE AND ETHNICITY: 80 - 99% OF MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, VA, and Conventional				
	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's	
American Indian/Alaska Native	10	2,460	3	905	30.0%
Asian	55	14,985	26	6,950	47.3%
Black or African American	139	36,545	76	20,350	54.7%
Native Hawaiian/Other Pacific Islander	5	1,775	2	690	40.0%
White	2,767	641,285	1,579	380,375	57.1%
2 or More Minority Races	5	1,565	3	945	60.0%
Joint (White/Minority Race)	46	12,430	25	6,685	54.3%
Race not Available	558	141,960	274	70,970	49.1%
Hispanic or Latino	335	83,505	179	48,075	53.4%
Not Hispanic or Latino	2,595	603,645	1,480	355,410	57.0%
Joint (Hispanic or Latino/Not Hispanic or Latino)	88	20,970	52	13,110	59.1%
Ethnicity Not Available	566	144,710	277	71,385	48.9%

Data Source: HMDA Aggregate Report 5 (2022)

As shown by **Table 37**, the 2 or More Minority Races, Joint (Hispanic or Latino/Not Hispanic or Latino), and White racial or ethnic groups within the 100-119% MSA AMI has the highest percentage of loans originated (100.0%, 60.2%, and 59.5%, respectively). The Black/African American racial group had the lowest percentage of load origination at only 48.5%.

TABLE 37: INCOME, RACE AND ETHNICITY: 100 - 119% OF MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, VA, and Conventional				
	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's	
American Indian/Alaska Native	30	8,440	16	5,210	53.3%
Asian	203	60,415	106	32,180	52.2%
Black or African American	332	88,230	161	46,225	48.5%
Native Hawaiian/Other Pacific Islander	20	6,260	10	3,270	50.0%
White	7,204	1,866,770	4,287	1,138,215	59.5%
2 or More Minority Races	5	1,725	5	1,725	100.0%
Joint (White/Minority Race)	142	35,190	84	22,150	59.2%
Race not Available	1,361	383,305	724	204,290	53.2%
Hispanic or Latino	782	213,610	443	130,095	56.6%
Not Hispanic or Latino	6,950	1,807,260	4,106	1,087,250	59.1%
Joint (Hispanic or Latino/Not Hispanic or Latino)	244	63,790	147	40,325	60.2%
Ethnicity Not Available	1,321	365,405	696	195,130	52.7%

Data Source: HMDA Aggregate Report 5 (2022)

Table 38 shows that the highest percentages of loans were provided to the racial or ethnic groups of White, 2 or more Minority Races, Not Hispanic or Latino, and Joint White/Minority Race (all 60.0% or higher). Notably, the lowest percentage of loans originated is 33.3% (Native Hawaiian/Pacific Islander), which is a significantly lower percentage than the rest of the racial/ethnic groups within this income bracket.

TABLE 38: INCOME, RACE AND ETHNICITY: > 120% OF MSA AMI

RACE/ETHNICITY	FHA, FSA/RHS, VA, and Conventional				
	Applications Received		Loans Originated		Percent Originated
	Number	\$000's	Number	\$000's	
American Indian/Alaska Native	59	21,375	30	12,290	50.8%
Asian	849	350,855	466	195,690	54.9%
Black or African American	528	206,910	297	121,005	56.3%
Native Hawaiian/Other Pacific Islander	27	10,075	9	3,215	33.3%
White	19,901	8,352,865	12,344	5,288,640	62.0%
2 or More Minority Races	15	5,135	10	4,280	66.7%
Joint (White/Minority Race)	505	208,515	307	125,695	60.8%
Race not Available	4,045	1,814,425	2,280	1,066,480	56.4%
Hispanic or Latino	1,239	469,455	662	268,530	53.4%
Not Hispanic or Latino	19,824	8,380,770	12,261	5,282,725	61.8%
Joint (Hispanic or Latino/Not Hispanic or Latino)	811	306,135	514	204,960	63.4%
Ethnicity Not Available	4,050	1,811,700	2,305	1,060,075	56.9%

Data Source: HMDA Aggregate Report 5 (2022)

6.0 MANATEE COUNTY FAIR HOUSING PROGRAM ACTIONS

The Manatee County 2017-2021 Assessment of Fair Housing (AFH), which was completed in 2016, identified eight (8) goals toward achieving Fair Housing in Manatee County. These goals, organized by highest priority, were as follows:

1. Identify opportunities to reinvest in R/ECAPS to eliminate blighted conditions and spur redevelopment.
2. Address contributing factors of poverty and segregation.
3. Strengthen code enforcement on substandard rental units.
4. Increase availability of affordable housing in Manatee County.
5. Expand Fair Housing Education within Manatee County.
6. Provide services that improve financial literacy and access to financing for minority and low-income populations.
7. Improve the enforcement of Fair Housing laws and ordinances.
8. Provide better access to opportunity for protected classes through public services.

Although Manatee County did not have enough funding to address all goals every program year, the County took incremental actions during the reporting period based on the availability of HUD funding and local resources (e.g., staffing and funding). Actions were also limited due to restrictions during the COVID-19 pandemic that dominated household and workplace dynamics for over two years. However, the County acknowledges the importance of Affirmatively Furthering Fair Housing and will continue to make best efforts to address the goals provided in the previous AFH and the new recommendations of this current AI Report.

6.1 ACTIONS OF MANATEE COUNTY

The Manatee County Board of County Commissioners and County Departments regularly strive to Affirmatively Further Fair Housing through continued support of the County's HUD-funded programs and related initiatives. Annually, the Manatee County Board of County Commissioners makes a proclamation for Fair Housing Month every April. Fair Housing Month is also noticed via social media blasts and other means.

In particular, the County continues to incentivize reinvestment in R/ECAPs (Goal 1) through prioritization of grant applications either located in or benefitting those areas. The County gives priority to grant applications that support protected classes (Goal 8), such as services benefitting persons with disabilities and public facility/infrastructure projects that meet ADA compliance. The County also regularly provides Fair Housing education and financial literacy training (Goal 5 and Goal 6) as part of its housing programs, including homebuyer education for Down Payment Assistance (DPA).

The County also supports efforts to address contributing factors of poverty (Goal 2) by investing in people and the neighborhoods in which they live. The County recently completed Neighborhood Action Plans for the Washington Park and Parrish neighborhoods and coordinates with other neighborhoods (e.g.,

Rubonia, Whitfield, and Bayshore) regarding priority needs. The County is currently working on two homeless initiatives: Fresh Start and Under One Roof. These projects, if realized, would produce shelter facilities and onsite wrap-around services to lift homeless persons and families, respectively, out of poverty. Additionally, CareerSource Suncoast, Suncoast Technical College, and State College of Florida are active in Manatee County and offer career advancement training, including summer programs for youth and young adults.

Code enforcement in Manatee County, particularly code enforcement on substandard rental units (Goal 3), is an ongoing challenge. Recent code enforcement initiatives through the Development Services Department have focused on businesses along the County's major transportation corridors, with a focus on beautification. Under the Public Safety Department, the County's code enforcement inspectors operate by zones, and generally focus on exterior conditions visible from the street. However, residents are encouraged to use the "Report-A-Complaint" feature on the County's website to initiate a code enforcement case to report unsafe structures or nuisances.

Manatee County continues to prioritize affordable housing (Goal 4). The County is currently updating its Comprehensive Plan to include affordable housing incentives, and corresponding updates to the Land Development Code will follow. Such incentives include Rapid Response (i.e., expedited permitting review), density bonus, and fee deferral, which are currently codified under Part VI, Section 545, of the County's Land Development Code. Additional, targeted incentives for affordable housing are offered through the Livable Manatee Incentive Program, which was approved by the Board of County Commissioners on September 13, 2022 (Resolution R-22-158).

6.2 ACTIONS OF MANATEE COUNTY HOUSING AUTHORITY

The Manatee County Housing Authority (MCHA) takes an active role not only in the provision of affordable housing for the County's lowest income households, but also in Fair Housing education and Affirmatively Furthering Fair Housing. During the reporting period, the MCHA took the following actions to expand Fair Housing education, which address Goal 4 (Affordable Housing) and Goal 5 (Fair Housing Education) of the Manatee County 2017-2021 AFH:

- MCHA continues to work to supply affordable housing to the County's lowest income clientele, either through existing or new affordable rental units with HCV or public housing assistance.
- MCHA applicants receive a briefing packet with Fair Housing information when they come into MCHA offices for HCV or public housing assistance.
- Prior to the COVID-19 pandemic, MCHA played a looped television recording with Fair Housing information in the lobby.
- Currently, the MCHA online housing portal contains Fair Housing information.

6.3 ACTIONS OF AFFORDABLE HOUSING ADVISORY COMMITTEE

The Affordable Housing Advisory Committee (AHAC) of Manatee County meets regularly to discuss issues surrounding housing in Manatee County, and in particular affordable housing and barriers to obtaining such housing. During this reporting period, the AHAC was consulted about Fair Housing issues and identified the following concerns related to Goal 2 (Contributing Factors), Goal 4 (Affordable Housing), Goal 5 (Fair Housing Education), and Goal 8 (Opportunity Access):

- AHAC emphasized the importance of transportation proximity to Fair Housing.
- AHAC identified regulatory barriers to affordable housing, including barriers created by Zoning or Land Use policies. There is a need to allow alternative housing types (e.g., smaller units, accessory dwelling units, etc.) and unit sizes (i.e., smaller units) to improve access to affordable housing and reduce competition for housing. These housing types could especially benefit seniors living on fixed incomes.
- AHAC confirmed the need for Fair Housing education for landlords and tenants (e.g., seminars and workshops), to increase awareness. The AHAC stressed that those providing such training should be someone the community trusts.
- AHAC identified the need for further poverty-reducing measures, including federally funded rental assistance, public services, and legal aid.

7.0 OVERVIEW OF CITIZEN PARTICIPATION AND CONSULTATION

During development of this AI Report, Manatee County held public hearings and focus group consultations. The following Fair Housing consultation events were held:

- February 29, 2024 – Public Hearing/Grant Application Workshop with Citizens and Subrecipients
- March 6, 2024 – Focus Group Consultation with MCHA
- March 18, 2024 – Focus Group Consultation with AHAC
- April 23, 2024 – Manatee County Proclamation for Fair Housing Month
- April-May 2024 – 30-Day Comment Period on Draft AI Report
- May 28, 2024 – Public Hearing with Board of County Commissioners

At each public hearing and focus group consultation, Manatee County provided an opportunity for all attendees to participate with a facilitated open discussion regarding Fair Housing and contributing factors to impediments to Fair Housing. A summary of those discussions follows.

7.1 OPEN DISCUSSION – EXPERIENCES OF DISCRIMINATION

Attendees were asked to discuss whether they, or someone they knew or had known, had ever experienced housing discrimination, the basis of such discrimination, and what actions were or should have been taken. Several experiences of discrimination were identified:

- Familial status and number of persons in family as basis of discrimination
 - Large families and perception of overcrowding/doubling-up occupancy
 - Single women and harassment/discrimination as leverage for housing
- Disability status
 - ADA accessibility provisions not always available
 - Limited number of units with ADA improvements in housing supply
 - Need for ADA improvement grants
 - Service animals not always accepted
 - Need for landlord education about service animals and persons with disabilities as protected class
- Criminal background
 - Having a criminal background as an impediment to housing choice
- Group homes
 - Many neighborhoods do not want group homes, but they are a necessary housing type
- Steering
 - Discussion of “fine line” between steering and providing safe housing choices
 - R/ECAPs have the most affordable housing options, although not affordable enough for most lower income households
 - The affordable housing concentration in R/ECAPs furthers economic poverty and segregation in these areas
 - Need landlord/tenant education (both parties) about choice in Fair Housing

To address these examples of discrimination, landlord/tenant education is needed to define Fair Housing, the protected classes under the Fair Housing Act, and to prevent discrimination based on familial status, disability, or background. Regarding group homes and steering, further education regarding Fair Housing choice is needed to ensure that housing decisions are being made based on ability to pay rather than other contributing factors such as land use policies, public perception, poverty, and segregation.

7.2 OPEN DISCUSSION – FAIR HOUSING CONCERNS/ISSUES

Attendees were asked to discuss general Fair Housing issues and concerns within Manatee County, not limited to experiences of discrimination. Several other Fair Housing concerns and issues were identified, which were all deemed impediments to Fair Housing choice:

- Housing cost and affordability
 - Section 8/HCV participants earning less than 30% AMI struggle to afford housing in limited amount of time (i.e., “use or lose” scenario)
 - HCV was originally intended to help mitigate competition for units, but that is no longer working since competition is the most significant impediment to Fair Housing choice
 - Most seniors on fixed income cannot make minimum threshold to afford housing
- Housing supply
 - Significant lack of affordable housing inventory in Manatee County
 - Lagging housing supply; projects are 12-18 months out, when housing crisis is now
 - “Housing First” strategy is difficult to implement when there are no units
 - Lack of variety of unit sizes to accommodate single person households or large families (i.e., emphasis on two bedroom units leaves few options for other household sizes)
 - Public-private partnerships are needed to increase housing inventory
 - Need for higher density housing with “big” density incentives to reduce per unit cost for developers
 - Definition of “affordable housing” is different between parties; need to reconcile definitions to find common ground
 - Need to address barriers to alternative unit types and sizes
- Housing quality
 - Lack of code enforcement on mobile homes
 - Prevalence of substandard units
 - Need for some type of inspection program
 - Need for funding not only to inspect, but also to incentivize repair
 - Need to get more landlords to participate in section process and incentive landlords to make repairs
- Based on input received at the public hearings and focus group consultation, the most significant impediments to Fair Housing choice in Manatee County are affordability, supply, and quality of affordable housing. Without access to affordable housing, increasing competition for

units increases the likelihood of discrimination in housing choice. This competition affects lower income households, including but not limited to elderly persons on fixed income. There is a distinct need to not only increase the supply of affordable housing, but to also provide financial assistance to improve affordability. Additionally, there is a need for increased code enforcement paired with repair incentive programs so landlords can improve the quality of substandard housing units. The improvement of substandard housing units through targeted repairs could increase the affordable housing supply in Manatee County.

7.3 OPEN DISCUSSION – FAIR HOUSING RESOURCES

Attendees were asked to discuss whether sufficient Fair Housing resources are available in Manatee County, and if additional Fair Housing resources are needed. Several Fair Housing resources were identified:

- Fair Housing liaison/ombudsman
 - Currently, Fair Housing complaints are routed to HUD’s Atlanta Office of Fair Housing and Equal Opportunity (FHEO)
 - There is a need for someone local that is educated and can help (i.e., local Fair Housing contact person)
 - Potential coordination with Sherriff’s Department and Manatee County 311 app or similar resource
- Fair Housing education seminars/workshops
 - Need to educate landlords/tenants about legal rights and how to document Fair Housing complaints appropriately
 - Need incentives for landlords to improve compliance with Fair Housing laws
 - Need expanded protections for tenants

The most needed Fair Housing resources in Manatee County are a local Fair Housing liaison/ombudsman and regular Fair Housing education seminars/workshops for tenants and landlords. Additionally, as noted under Fair Housing concerns and issues, there is a need for public-private partnerships to develop new affordable housing, and a program to incentive the inspection and repair of existing substandard units to increase the affordable housing supply in Manatee County. Such programs could increase not only the supply, but the variety of unit types available to help reduce competition for units.

8.0 NATURE AND EXTENT OF FAIR HOUSING ISSUES

Fair Housing Complaint Activity

Citizens of Manatee County who believe they have experienced fair housing discrimination may file their complaints through entities including, but not limited to: the State of Florida Commission on Human Rights; the Manatee County Community and Veterans Services Department; and the HUD Atlanta Office of Fair Housing and Equal Opportunity (FHEO).

As part of the AI, the FHEO was contacted and requested to provide summary information about cases that had been filed by or against organizations or residents in Manatee County. Presented in **Table 39** is the provided Fair Housing complaint data dating from 2019 through 2023.

TABLE 39: FAIR HOUSING COMPLAINT ACTIVITY (2019-2023)

Filing Date	Basis	Issue(s)	Status
1/28/2019	Disability	Discrimination in terms/conditions/privileges relating to sale; Failure to make reasonable accommodation	Conciliation/settlement successful
1/28/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause
3/26/2019	Disability	Failure to permit reasonable modification	No cause
4/10/2019	Disability	Failure to permit reasonable modification	No cause
4/10/2019	Disability	Failure to permit reasonable modification	No cause
5/14/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause
6/11/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful
6/13/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause
7/18/2019	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution
7/29/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause
9/23/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution

9/30/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful
9/30/2019	Race	Discrimination in terms/conditions/privileges relating to rental; Steering	Conciliation/settlement successful
9/30/2019	Race, Sex	Discriminatory financing (includes real estate transactions); Discrimination in the terms/conditions for making loans	No cause
10/4/2019	National Origin	Discriminatory refusal to sell and negotiate for sale; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to sale	No cause
10/21/2019	National Origin	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable	No cause
10/23/2019	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause
11/26/2019	Race, National Origin, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful
2/18/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap)	No cause
2/19/2020	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Dismissed
2/26/2020	Race, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause
3/20/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause
4/14/2020	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause
4/17/2020	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause
5/22/2020	Race	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale	No cause

6/11/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution
6/23/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	No cause
6/29/2020	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause
7/10/2020	Religion	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause
8/24/2020	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution
8/26/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause
8/27/2020	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause
12/30/2020	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause
1/22/2021	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution
1/22/2021	National Origin, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause
1/25/2021	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause
3/29/2021	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause
3/29/2021	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause
4/8/2021	National Origin, Disability	Discriminatory refusal to sell; Discriminatory financing (includes real estate transactions)	No cause

6/4/2021	Disability	Discriminatory refusal to sell; Discrimination in terms/conditions/privileges relating to sale; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution
6/14/2021	Disability	Discrimination in terms/conditions/privileges relating to sale	Complaint withdrawn by complainant without resolution
2/22/2022	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful
4/8/2022	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution
4/11/2022	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful
5/25/2022	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause
5/31/2022	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause
9/20/2022	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause
10/7/2022	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful
11/1/2022	Race, Sex	Discriminatory refusal to sell and negotiate for sale; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	In Process
11/4/2022	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause
11/10/2022	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	In Process
11/30/2022	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	In Process
12/7/2022	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause

12/15/2022	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful
1/6/2023	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	No cause
3/6/2023	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	In Process
3/29/2023	National Origin	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause
3/31/2023	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause
4/21/2023	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause
8/14/2023	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	In Process
9/21/2023	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	In Process
9/25/2023	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause
10/10/2023	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	In Process
12/29/2023	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	In Process

Data Source: HUD Atlanta Office of Fair Housing and Equal Opportunity (FHEO), Fair Housing Complaints Filed 2019-2023

In 2019, there were 18 reported cases of housing discrimination in Manatee County. Of these cases, 13 were based on disability or handicap, three were based on race, three were based on national origin, one was based on sex, and one was based on familial status. Some of these cases included multiple bases for reason of discrimination. Each case received a follow-up to determine if a resolution could be made. Of the 18 reported cases, it was determined that 10 of the cases had no cause, five cases were able to be reconciled or settled, one complaint was withdrawn without resolution, and another case was withdrawn after a resolution was made.

In 2020, there were a total of 15 reported Fair Housing complaints received by the FHEO. Of these cases, there were eight complaints filed based on disability or handicap, six were based on race, two were based on familial status, and one was based on religion. Some of these cases included multiple bases for reason of discrimination. Each case received a follow-up to determine if a resolution could be made. Of the 15 reported cases, it was determined that 12 of the cases had no cause, one case was dismissed, one complaint was withdrawn without resolution, and another case was withdrawn after a resolution was made.

In 2021, there were a total of eight reported Fair Housing complaints in Manatee County. Of these cases, there were six complaints filed because of disability or handicap. There were two complaints based on race, two based on nation origin, two based on familial status, and one was considered retaliation. Some of these cases included multiple bases for reason of discrimination. Each case received a follow-up to determine if a resolution could be made. Of the eight reported cases, it was determined that five of the cases had no cause and three complaints were withdrawn without a resolution.

In 2022, there were 13 cases that reported discrimination against protected classes or similar issues in housing choice. Of these cases, there were six complaints filed because of disability or handicap. There were six complaints based on race, two based on sex, and one based on national origin. Some of these cases included multiple bases for reason of discrimination. Each case received a follow-up to determine if a resolution could be made. Of the 13 reported cases, it was determined that five of the cases had no cause, four cases were able to be reconciled or settled, one case was withdrawn after a resolution was made, and three cases are still in process.

In 2023, there were 10 reported cases of discrimination in Manatee County during 2023. Among the cases reported, four were based on race, three were based on discrimination against disability or handicap, one was based on sex, and one was considered retaliation. Each case received a follow-up to determine if a resolution could be made. Of the 10 reported cases, it was determined that five of the cases had no cause and five of the cases are still in process.

While the general demographics provided for Manatee County are intended to paint a picture of the overall make-up of the community, the information also points to some issues that may be influencing Fair Housing conditions and possibly impeding Fair Housing choice. The continued isolation of certain demographic groups in the County indicates challenges in breaking down racial and ethnic barriers to foster an environment conducive to integration. Poverty and the myriad challenges that face households experiencing poverty reduces housing choice and often contributes to isolation. Finally, some protected classes continue to experience discrimination and often face housing problems.

Examination of the latest available HMDA data for the North Port-Sarasota-Bradenton, FL MSA showed that lending practices of financial institutions in the area may be interpreted to be an impediment to Fair Housing choice for minorities. Although discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements, the data can display patterns in lending practices. In this case, analysis of the data revealed that minority applicants, overall, have lower rate of origination and higher rate of denial. Since analysis of the data cannot conclusively determine a correlation unless a

more sophisticated analysis is done, which will take into account other factors affecting underwriting decisions; and since the analysis undertaken indicates a certain degree of discrimination in lending based on minority racial/ethnic characteristics of the property location, it may be inferred that lending issues and/or credit issues may play a role in the outcome of the analysis. This outcome calls for a unified approach in which both the private sector and the public sector would work together to first identify the causes for the higher rate of denial and second to find a solution.

9.0 SUMMARY AND SYNTHESIS

As part of the federal CDBG program, HUD requires Manatee County to identify Fair Housing challenges within its Urban County jurisdiction. To accomplish this task, such identification was based on the intersection of data collected for the AI Report, information gathered during public hearings and focus group meetings, input from public comment, and Manatee County's Fair Housing actions over past program years. The more a topic intersected within these sources, the higher the priority that should be placed. However, consideration must be given to certain constraints and realities facing Manatee County, included but not limited to staffing and funding for Fair Housing program implementation.

The AI Report's analysis pointed to an aging population with an increase in elderly residents. This will have an effect in housing needs and choice. This demographic shift will increase the demand for assisted living units with accessible features and other adaptive changes to residential buildings. According to the AI Report, much of the region's housing stock is designed to meet the needs of families with children. As residents' health, lifestyle and preferences change due to age and physical ability, certain barriers such as narrow doors, hallways, etc. become impediments.

In consultation with the Manatee County AHAC, it was noted that the County's Land Development Code does not encourage a broad range of allowable housing types such as transitional housing and smaller unit sizes, which are needed to match the demographic characteristics of the County.

Racial and ethnic minorities are concentrated geographically, particularly in municipalities and the CDBG jurisdiction (Urban County), where older housing stock is located. Substandard units remain an issue in these areas. This was also identified in the previous 2017-2021 AFH. Generally, concentrations of racial and ethnic minorities coincide with concentrations of low- and moderate-income households in Manatee County and correspond to HUD-designated R/ECAPs.

In addition, Fair Housing education support from local organizations and nonprofits, such as legal aid related to Fair Housing, is lacking and much needed. The most common bases for Fair Housing complaints in Manatee County are disability and race. A Fair Housing liaison/ombudsman is needed to serve as a navigator for Fair Housing guidance.

Based on the preceding analysis of available data, information, and input, the following impediments, actions, and recommendations to address impediments to Fair Housing within Manatee County were identified.

10.0 RESOLUTION AND COMMITMENT

10.1 IMPEDIMENT #1 – LACK OF FAIR HOUSING EDUCATION, AWARENESS, AND INFORMATION FOR BOTH LANDLORDS AND TENANTS

Manatee County disseminates Fair Housing information during Fair Housing month and through regular coordination with the Manatee County Housing Authority (MCHA), subrecipients of the County's federally funded grant programs, and the public. However, discussions with citizens, grant subrecipients, and housing providers revealed that additional Fair Housing education is needed, particularly for landlords and tenants to ensure compliance with Fair Housing laws.

Action: *Expand Fair Housing education within Manatee County.*

Recommendation #1: Manatee County should support the facilitation of Fair Housing education seminars and workshops to educate landlords/tenants about legal rights and how to document Fair Housing complaints appropriately.

Recommendation #2: Manatee County should continue to coordinate with the MCHA to ensure that Fair Housing information is regularly distributed to applicants for Housing Choice Vouchers and residents of public housing.

Recommendation #3: Manatee County should continue to disseminate Fair Housing information during Fair Housing month and to include Fair Housing resources in communications with subrecipients of the County's federally funded grant programs.

10.2 IMPEDIMENT #2 – LIMITED AVAILABILITY OF AFFORDABLE HOUSING FOR PROTECTED CLASSES

During public hearings and consultation, the most identified impediment to Fair Housing was the limited supply of affordable housing in Manatee County. The limited supply of affordable housing leads, in turn, to increased competition and the increased likelihood of discrimination as competition further limits housing choice. In addition to affordability, the limited availability of different unit sizes and types, and in particular ADA accessible units, is also a contributing factor to Fair Housing issues.

To increase the supply of affordable housing, public-private partnerships are needed, along with density incentives to reduce the per unit cost of affordable housing construction. Furthermore, targeted programs toward the inspection and repair of substandard housing units are needed to bring older existing units back into the standard housing inventory.

Of the impediments to Fair Housing identified, the affordable housing deficit is by far the most complex and challenging impediment to address through the County's federally funded grant programs. Eliminating this barrier will demand county and regional solutions to economic problems felt throughout the State of Florida.

Action: *Increase the availability of affordable housing in Manatee County.*

Recommendation #1: Manatee County should continue to work with municipalities and private and non-profit housing developers and service providers to develop new affordable housing in a variety of unit types and sizes compliant with ADA standards.

Recommendation #2: Manatee County should develop a program to incentivize the inspection and repair of existing substandard units, so that landlords are encouraged to make repairs toward code compliance, and those units can contribute to the affordable housing inventory.

10.3 IMPEDIMENT #3 – RACIAL AND ETHNIC MINORITIES ARE CONCENTRATED GEOGRAPHICALLY WITHIN THE COUNTY

According to the U.S Census Bureau 2010 Decennial Census and the 2020 Decennial Census estimates, the number of minority residents within Manatee County continues to rise. The most substantial increases are within the Asian (62.1%), Hispanic (48.0%), and Pacific Islander (16.4%) populations.

Manatee County's minority populations continue to be concentrated in the County's R/ECAPs. Although housing units are generally more affordable in these areas, concentrating affordable housing options in the County's R/ECAPs may further contribute to concentrated poverty and segregation. Although these areas may be considered more affordable than other areas of the County, many housing units in the County's R/ECAPs are not only unaffordable, but also substandard.

Action: *Identify opportunities to reinvest in R/ECAPS to eliminate blighted conditions and spur redevelopment.*

Recommendation #1: Manatee County should continue to reinvest in R/ECAPs to eliminate blighted conditions and spur redevelopment. With that, the County should continue to give priority to federally funded grant applications that provide public facility and/or public infrastructure projects or economic development activities in these areas.

Recommendation #2: Manatee County should work with municipalities and private and non-profit housing developers and service providers to prevent steering, promote Fair Housing choice, and further distribute affordable housing equitably throughout the County rather than in existing concentrated areas of poverty.

Recommendation #3: See Impediment #4 and Recommendation #1, below.

10.4 IMPEDIMENT #4 – LACK OF CODE ENFORCEMENT ON SUBSTANDARD RENTAL UNITS

During public hearings and consultation, the prevalence of substandard rental units was identified as an impediment to Fair Housing. Such units have code violation issues that create safety concerns, and many are not accessible to persons with disabilities. Much like the State of Florida as a whole, Manatee County has a significant population of seniors, elderly, and persons with disabilities. As a result, the ratio of persons requiring accessibility accommodations is increasing. This demographic, combined with older housing stock and limited housing supply, means that fewer units are constructed with such improvements, and many require retrofits.

Additionally, the need for public facility and public infrastructure improvements toward ADA compliance is ever present.

Action: Strengthen code enforcement on substandard rental units.

Recommendation #1: Manatee County should develop a program to incentivize the inspection and repair of existing substandard units, so that landlords are encouraged to make repairs toward code compliance, and those units can contribute to the affordable housing inventory. This is especially important in the County's R/ECAPs, where reinvestment is most needed.

Recommendation #2: Manatee County should continue to support and prioritize applications for projects that provide ADA accessibility improvements, whether part of public facilities/infrastructure improvements, housing rehabilitation, or new construction. This includes grants for accessibility retrofits and other efforts toward ADA-compliant accommodations.

10.5 IMPEDIMENT #5: LACK OF LOCAL CONTACT FOR FAIR HOUSING COMPLAINTS AND GUIDANCE

Although Manatee County regularly makes referrals for those who have experienced Fair Housing discrimination, complaints are typically routed through HUD's Atlanta Office of Fair Housing and Equal Opportunity (FHEO). During public hearings and consultation, it was identified that a local Fair Housing liaison/ombudsman is needed to provide Fair Housing resources and guidance locally, and to ensure that Fair Housing laws and ordinances are enforced locally.

Action: Improve the enforcement of Fair Housing laws and ordinances.

Recommendation #1: Manatee County should continue to coordinate with the Manatee County Sheriff's Department and Manatee County 311 to provide Fair Housing enforcement resources.

Recommendation #2: Manatee County should establish a local Fair Housing liaison/ombudsman, as new position or role, to serve as a navigator to those seeking Fair Housing guidance locally, to facilitate the reporting of complaints to HUD FHEO, and to organize regular Fair Housing seminars/workshops within the community.

10.6 IMPEDIMENT #6: CONTINUED COMPLAINT ACTIVITY IN RECENT YEARS

Fair Housing complaint data collected from the HUD Office of Fair Housing and Equal Opportunity (FHEO) shows continued complaint activity within recent years (i.e., the previous five years). The majority of the complaint activity is based on disability status and race.

Action: Focus Fair Housing efforts where complaint activity has increased.

Recommendation #1: Manatee County should work with landlords and tenants to address the most commonly occurring basis (e.g., disability and race) and causes of Fair Housing complaint activity. Additionally, the County should focus on Fair Housing education (e.g., seminars/workshops) and continued coordination with organizations that provide Fair Housing resources, such as legal aid, to increase awareness of Fair Housing issues in the County.

Recommendation #2: Develop and implement a competitive funding allocation process, including fair housing-related criteria, for subrecipients of the County’s federally funded grant programs.

LIST OF MAPS

1. Black/African American Population Map
2. Hispanic Population Map
3. Other Minority Race Population Map
4. Households with Persons 18 Years and Under Map
5. Population of Age 65 and Over Map
6. Poverty Status Map
7. Poverty Status for Minority Populations Map
8. Low- and Moderate-Income Areas Map
9. Disability Status Map
10. Renter Occupied Units Map
11. Racial Density (Integration) Map

0 0.5 1 2 3 Miles



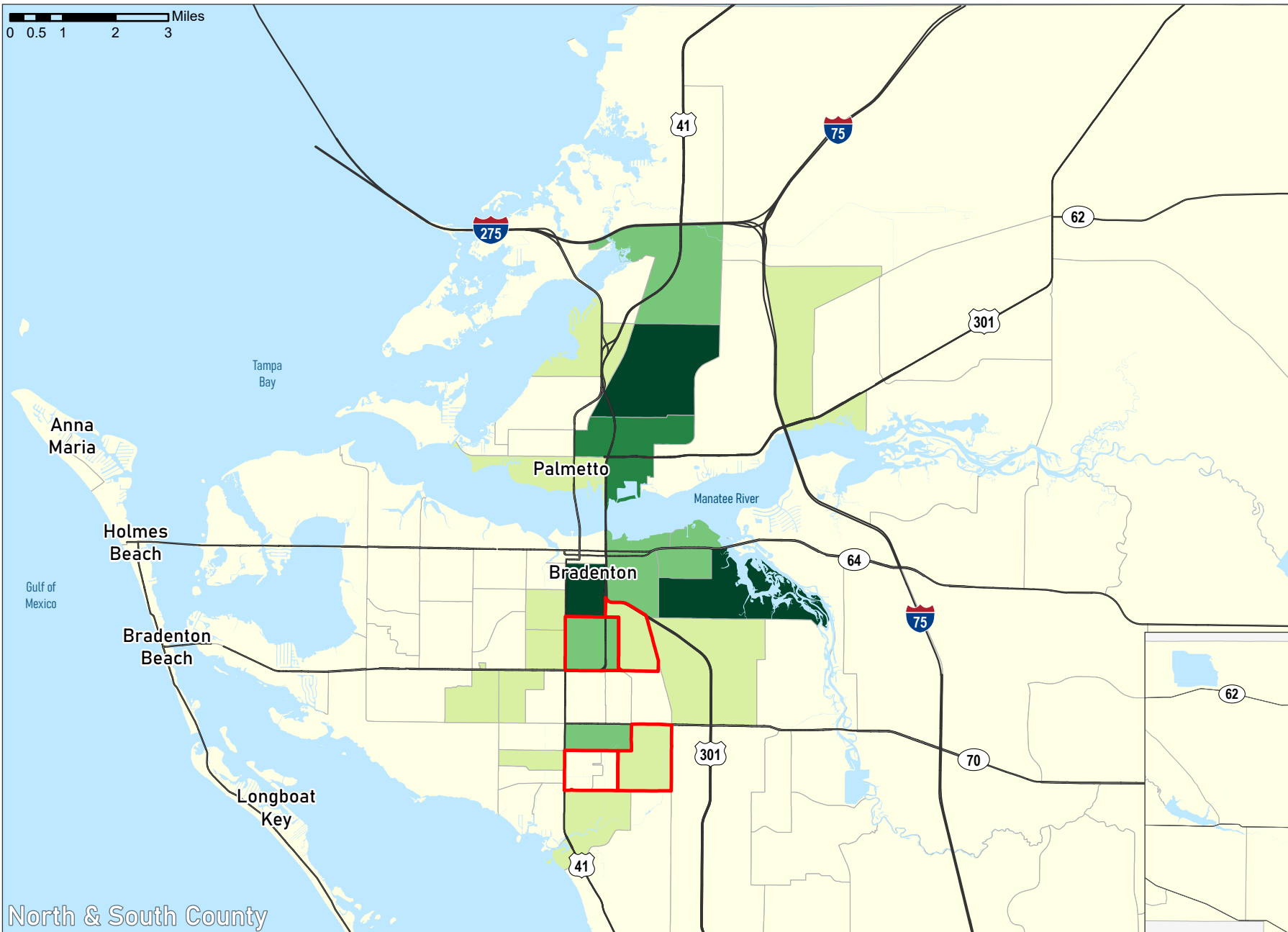
Analysis of Impediments to Fair Housing Choice



March 2024



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African American Population Manatee County, FL (Urban County)

Percent African American
by Census Tract



State and
U.S. Highways
R/ECAP*



Less than 10%

11% - 20%

21% - 30%

31% - 40%

41% or Greater

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey

East County

0 0.5 1 2 3 Miles



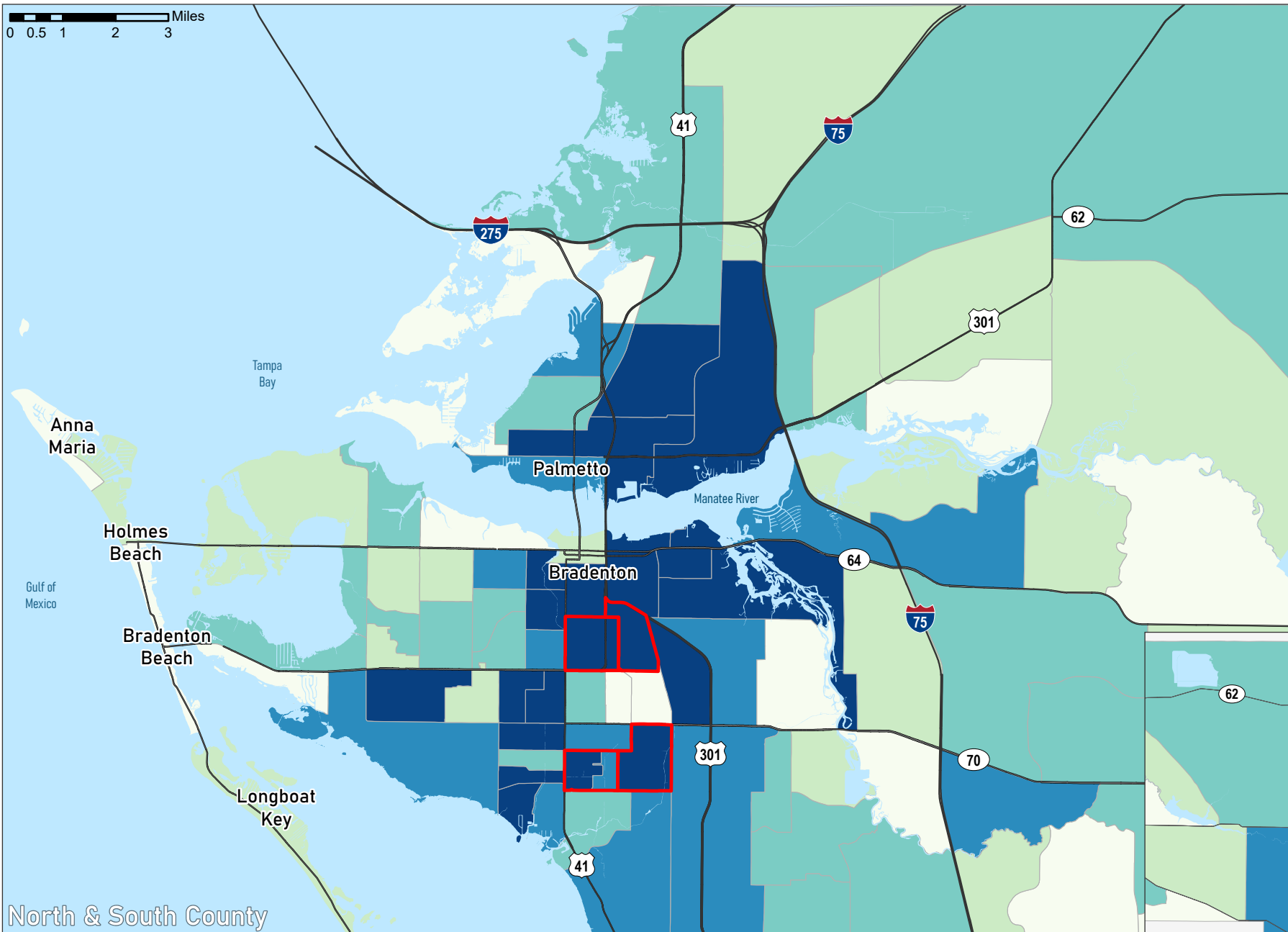
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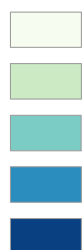
North & South County

Hispanic or Latino Population Manatee County, FL (Urban County)

Percent Hispanic or Latino
by Census Tract

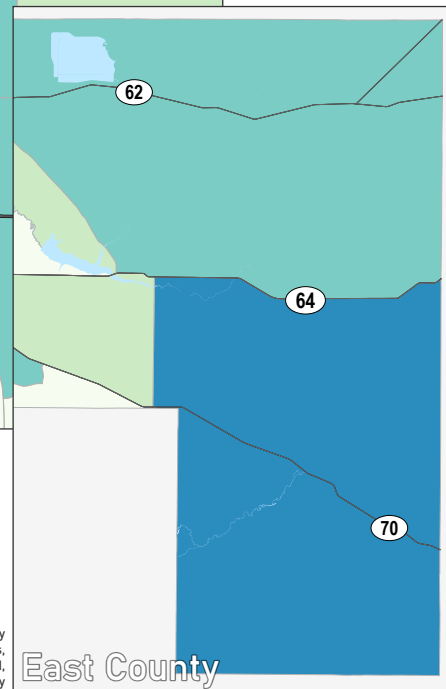


State and
U.S. Highways
R/ECAP*



Less than 5%
6% - 10%
11% - 15%
16% - 20%
21% or Greater

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey



East County

0 0.5 1 2 3 Miles



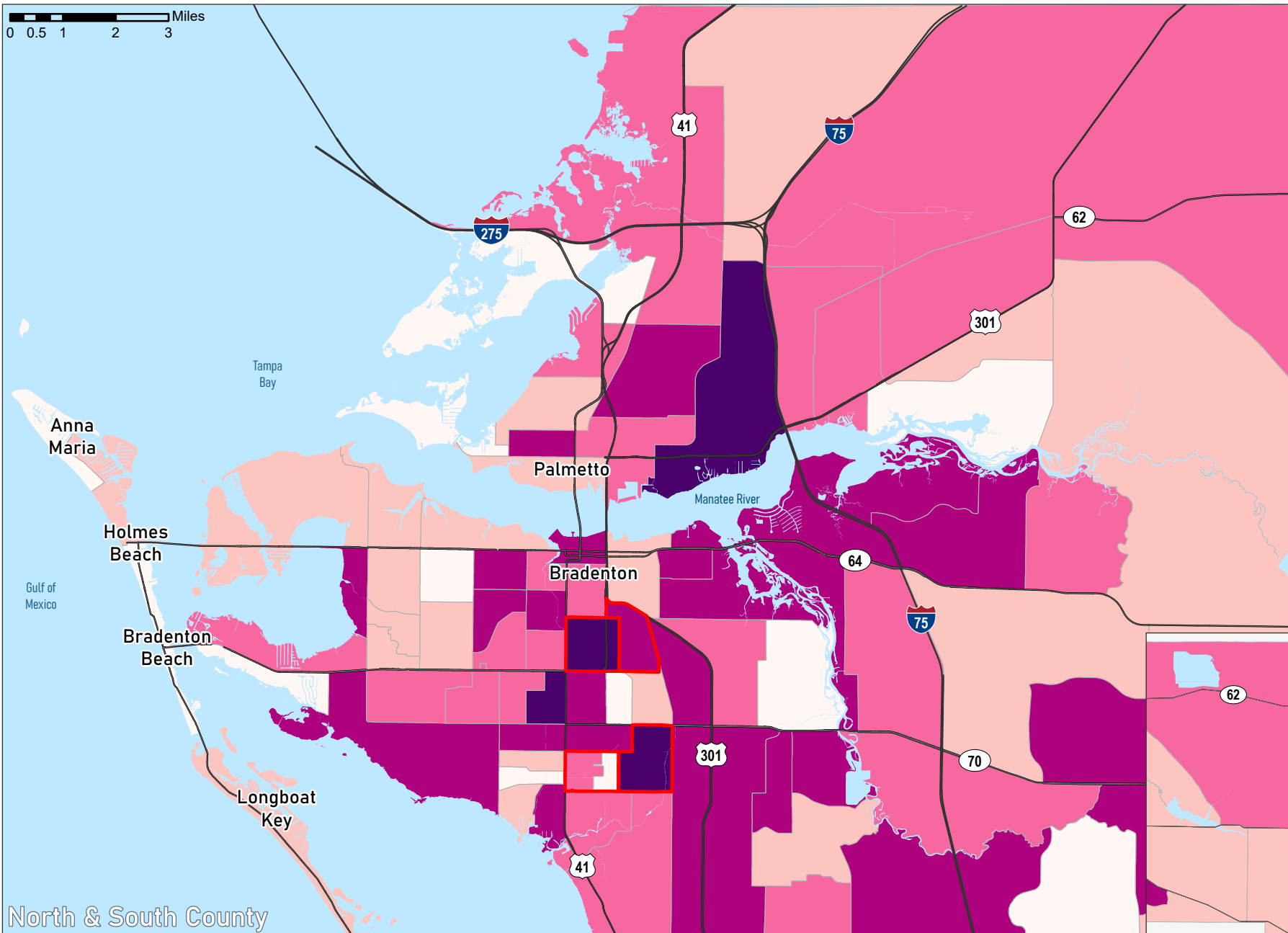
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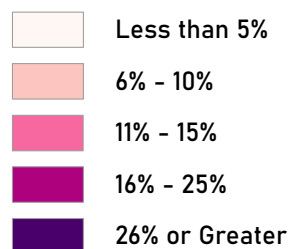


North & South County

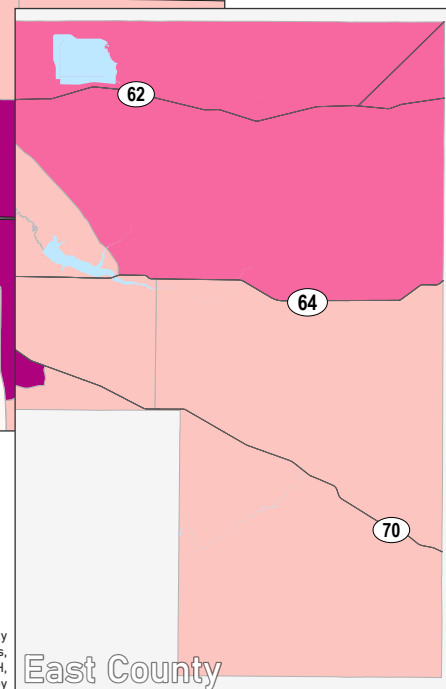
Other Minority Race Population Manatee County, FL (Urban County)

Other Minority Race Includes Asian, American Indian and Alaska Native, Native Hawaiian and Pacific Islander, Some Other Race, and Two or More Races by Census Tract

State and U.S. Highways
R/ECAP*



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey



0 0.5 1 2 3 Miles



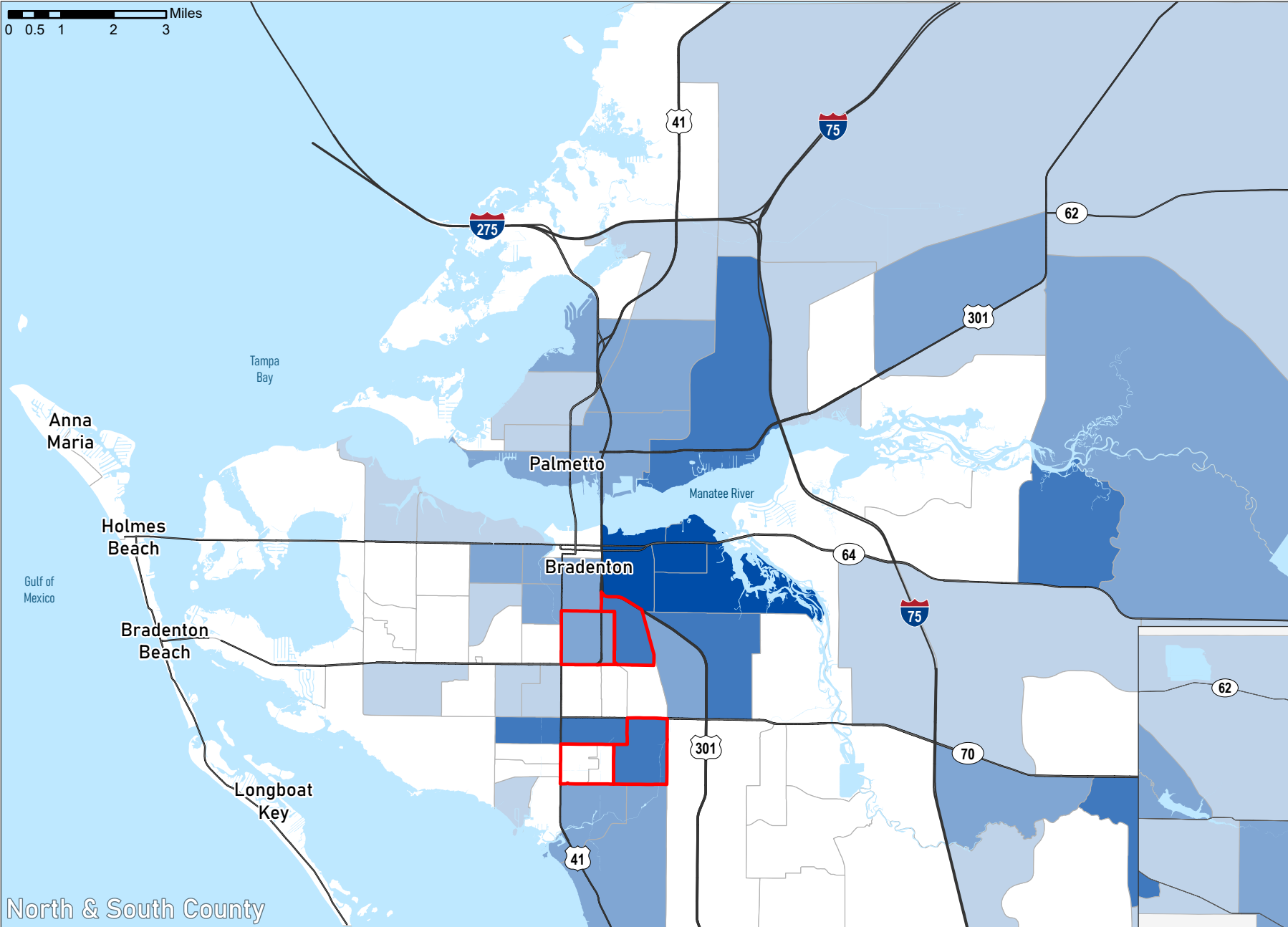
Analysis of Impediments to Fair Housing Choice



March 2024



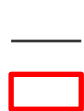
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North & South County

Persons Under Age 18 Population Manatee County, FL (Urban County)

Percent Persons Under Age 18
by Census Tract

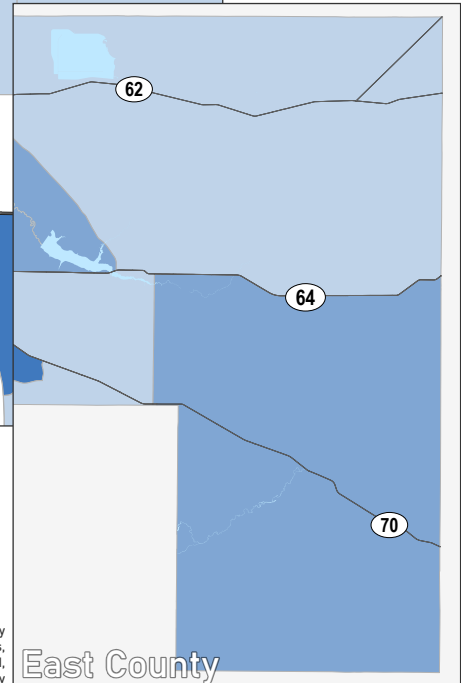


State and
U.S. Highways
R/ECAP*



Less than 15%
16% - 20%
21% - 25%
26% - 30%
31% or Greater

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey



East County

0 0.5 1 2 3 Miles



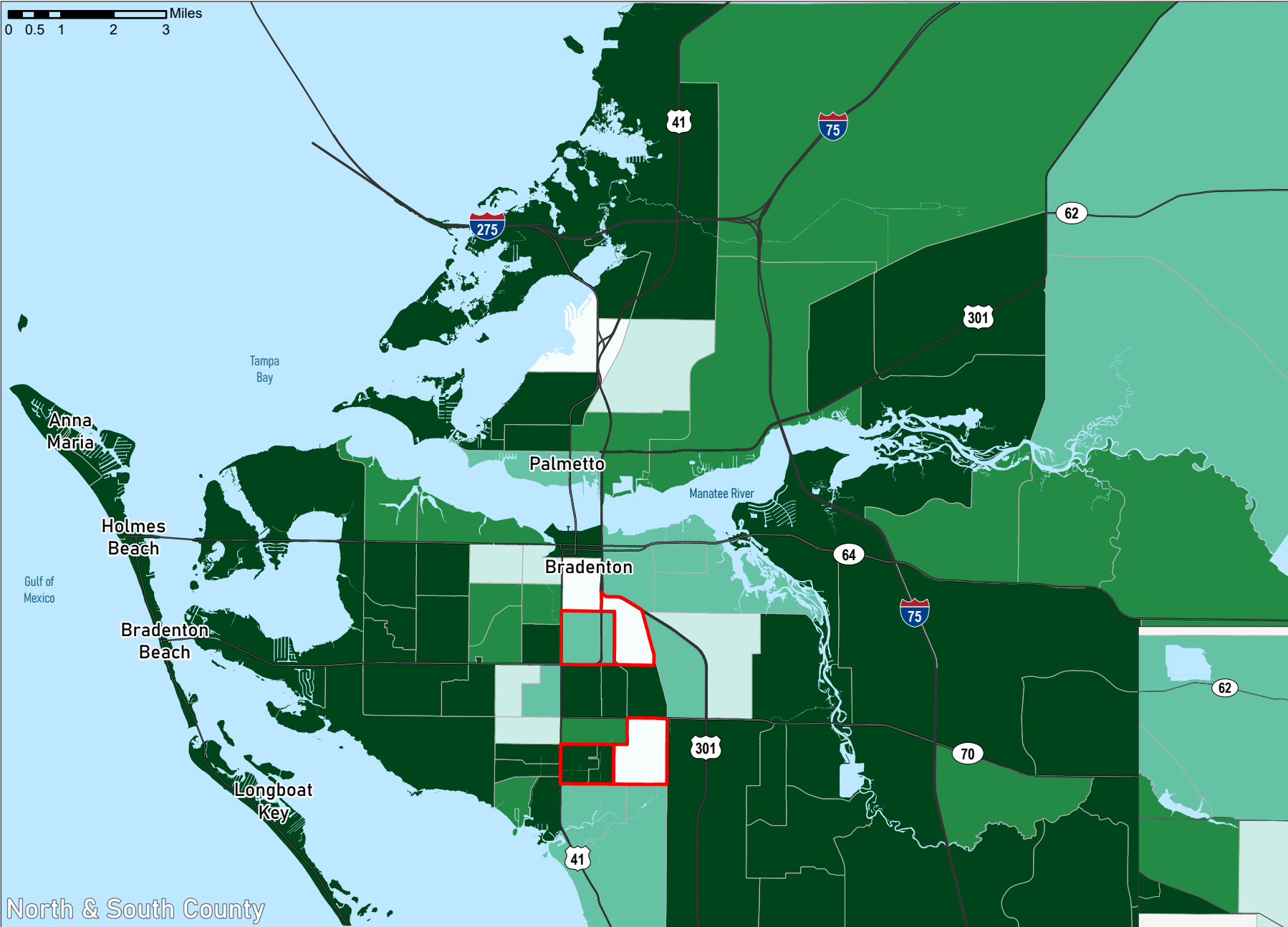
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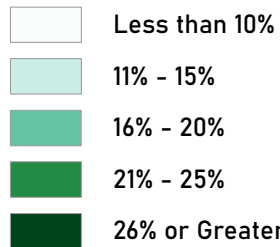


North & South County

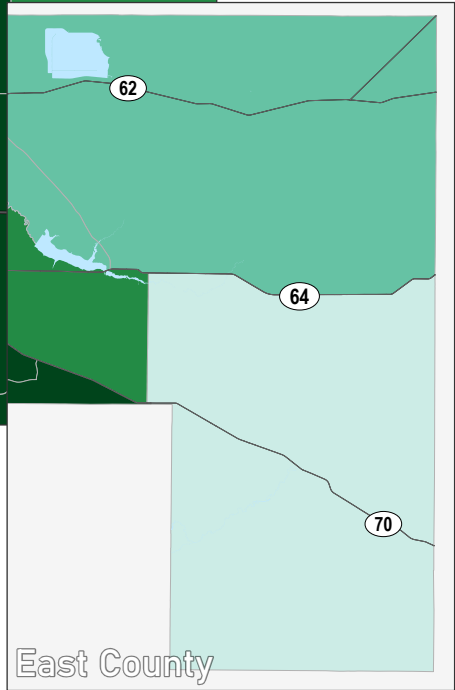
Persons Age 65 and Over Population Manatee County, FL (Urban County)

Percent Persons Age 65 and Over
by Census Tract

State and
U.S. Highways
R/ECAP*



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey



0 0.5 1 2 3 Miles



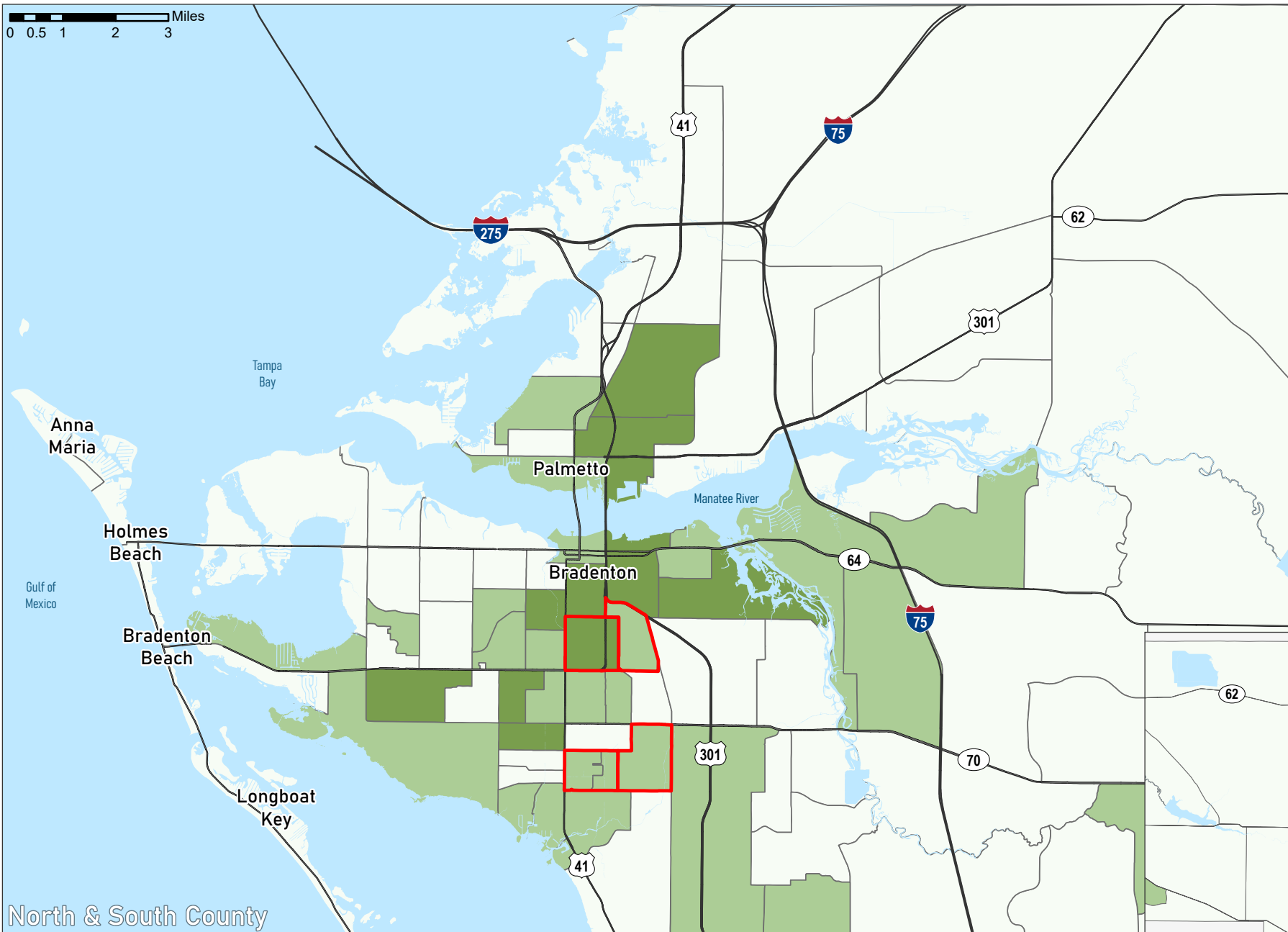
Analysis of Impediments to Fair Housing Choice



March 2024



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Poverty Status Population Manatee County, FL (Urban County)

Percent of Total Population
Below the Poverty Level
by Census Tract



State and
U.S. Highways
R/ECAP*



Less than 10%

11% - 20%

21% - 30%

31% - 40%

41% or Greater

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey

East County

0 0.5 1 2 3 Miles



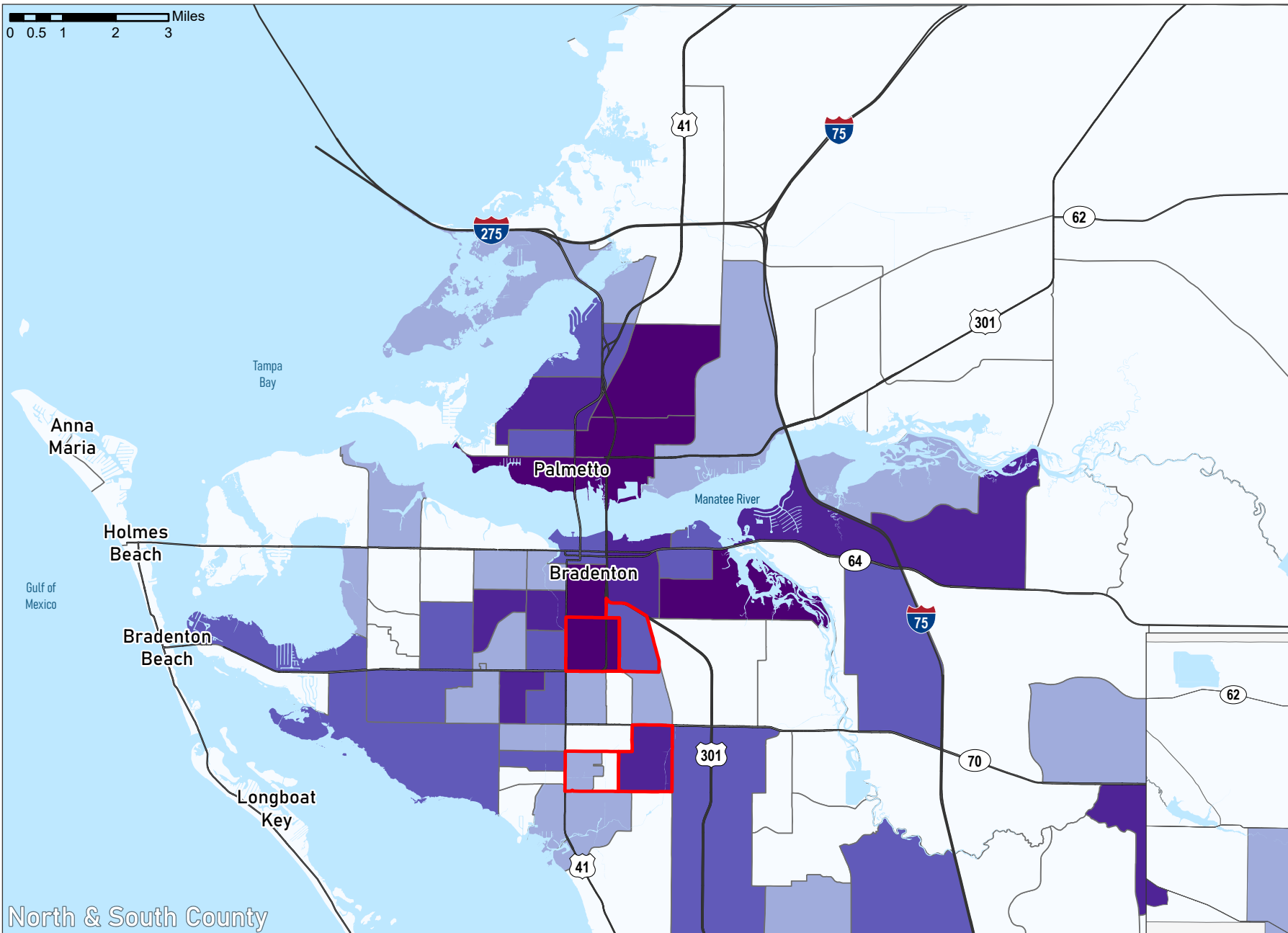
Analysis of Impediments to Fair Housing Choice



March 2024



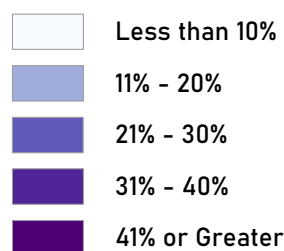
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North & South County

Poverty Status for Minority Population Manatee County, FL (Urban County)

State and
U.S. Highways
R/ECAP*



Percent of Minority Individuals* with Income Lower than the Poverty Level in the Past 12 Months, by Census Tract (*Reporting as any Race Other than White)

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey

East County

0 0.5 1 2 3 Miles



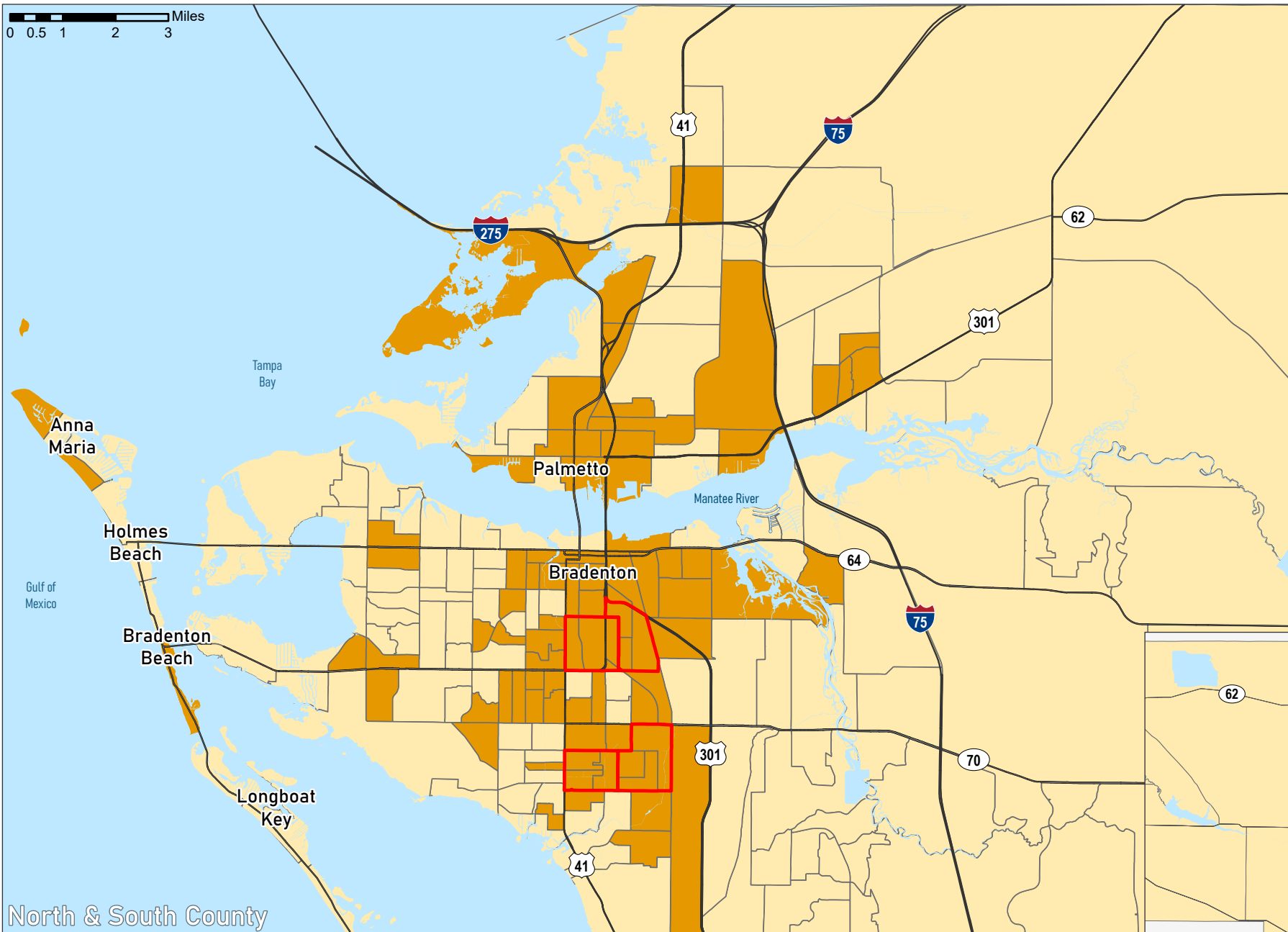
Analysis of Impediments to Fair Housing Choice



March 2024



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North & South County

Low & Moderate Income Areas Manatee County, FL (Urban County)

Low and Moderate Income Areas
by Block Group



State and
U.S. Highways

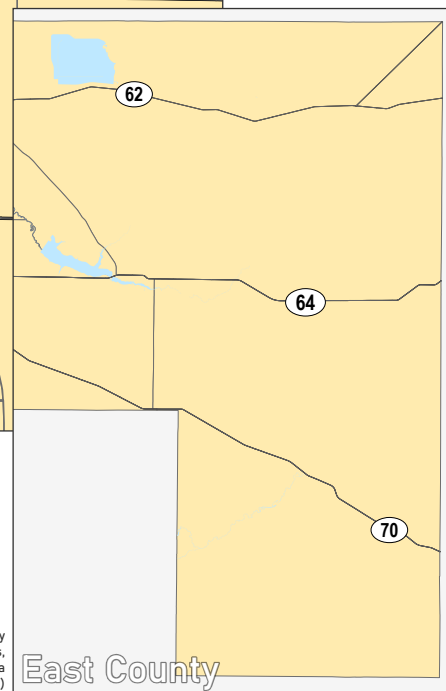
R/ECAP*



Low & Moderate Income Areas
(Block Groups > 51%)

All Other Block Groups

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2015 U.S. Block Groups,
2020 HUD AFFH, 2023 HUD Low/Mod Data
(2011-2015 American Community Survey, Base Data)



East County

0 0.5 1 2 3 Miles



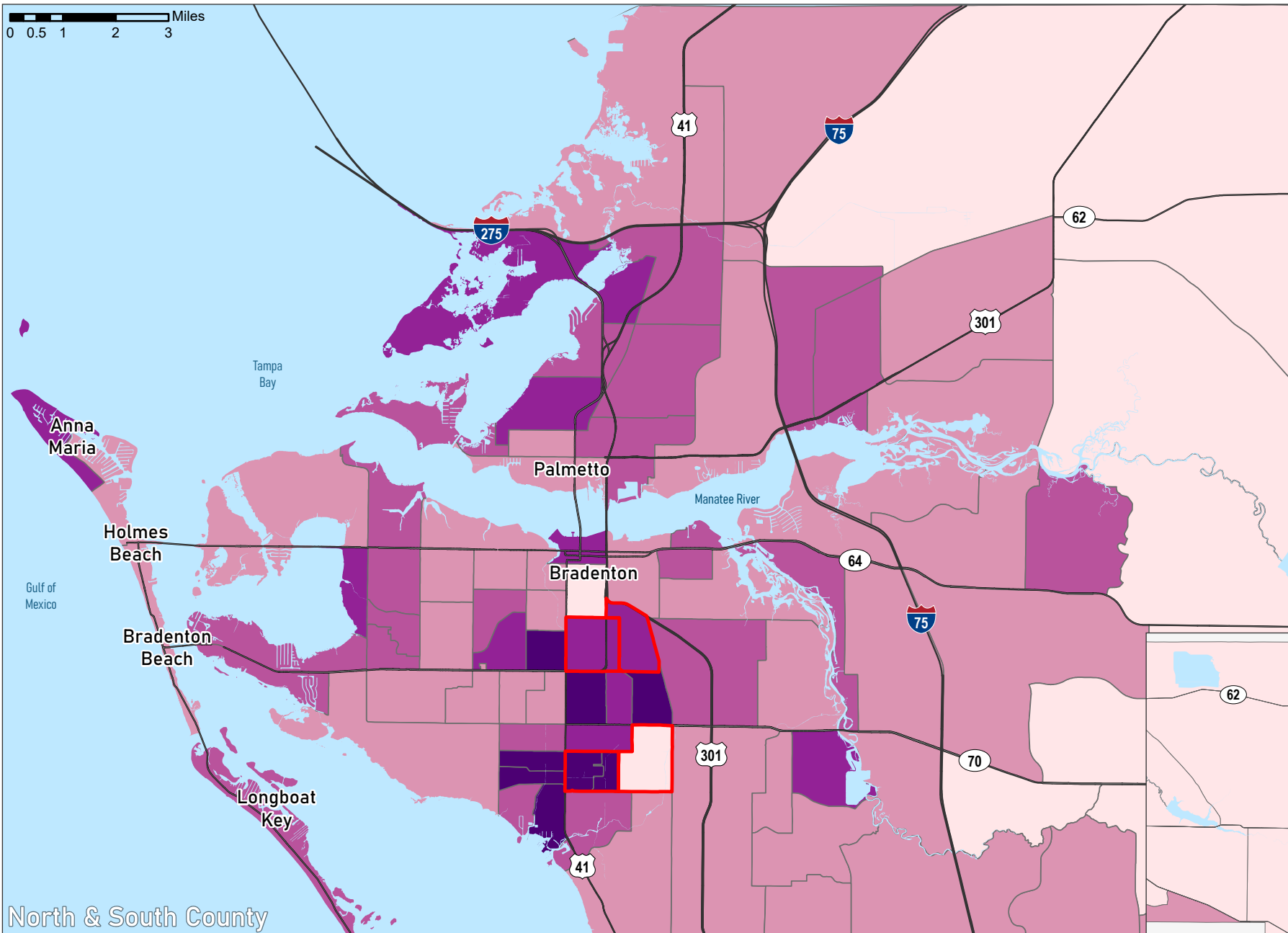
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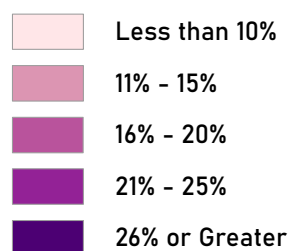


North & South County

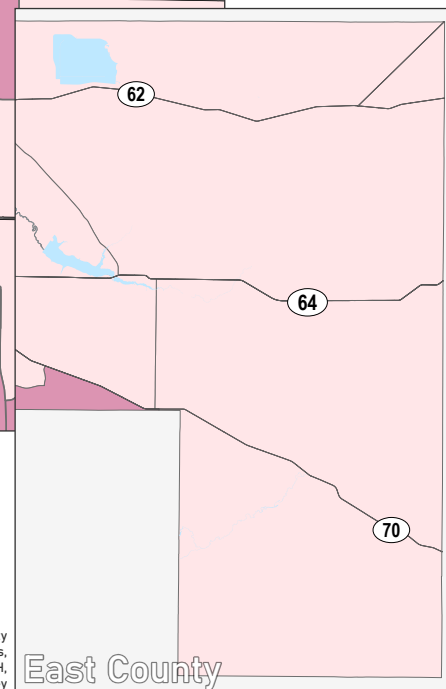
Disability Status Population Manatee County, FL (Urban County)

Percent of Total Civilian Noninstitutionalized
Population with a Disability
by Census Tract

— State and
U.S. Highways
 R/ECAP*



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey



East County

0 0.5 1 2 3 Miles



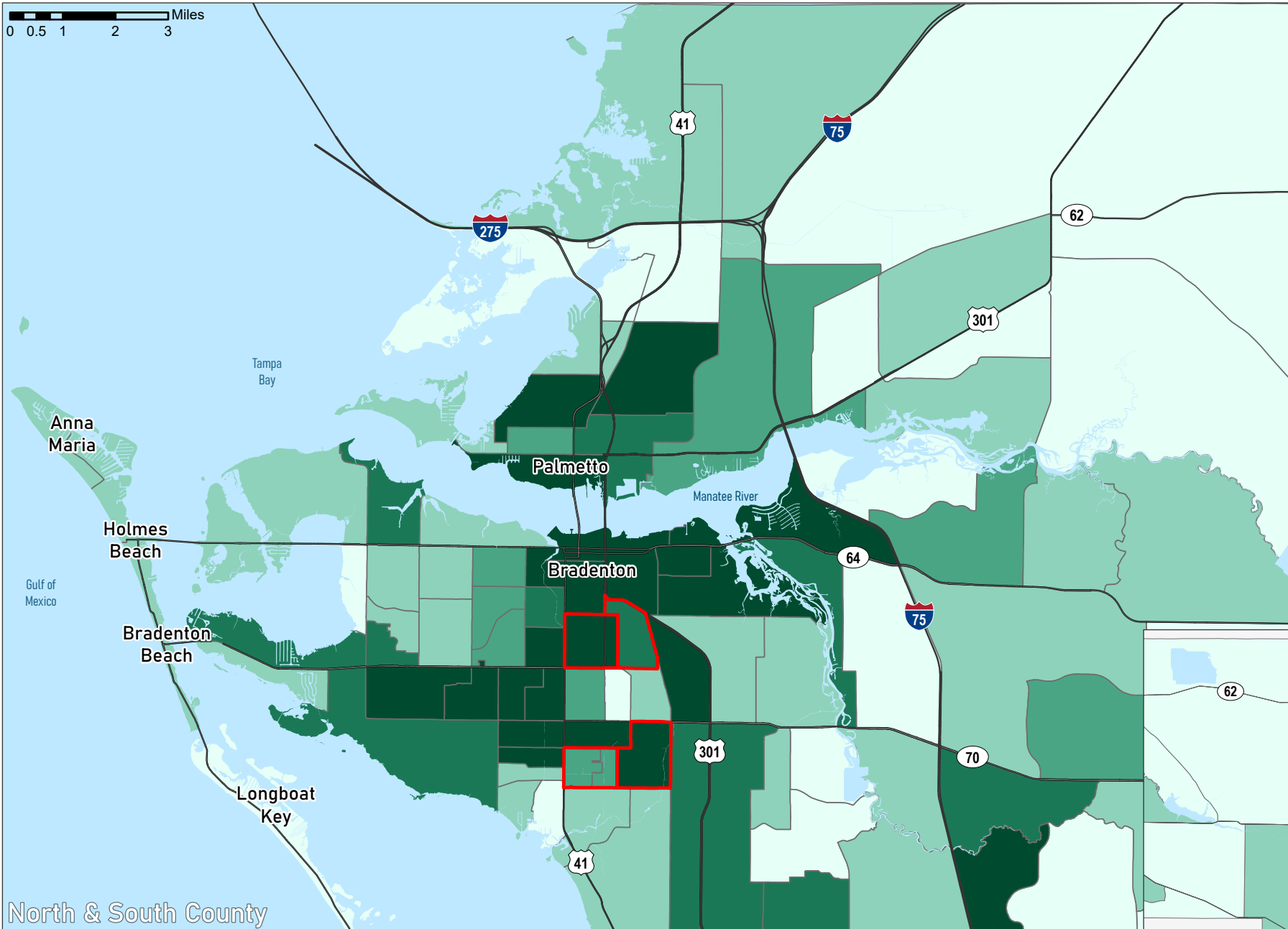
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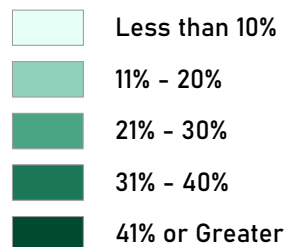
North & South County

Renter Occupied Units Manatee County, FL (Urban County)

Percent Renter Occupied Units
by Census Tract



State and
U.S. Highways
R/ECAP*



*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles,
2022 U.S. Census Tracts, 2020 HUD AFFH,
2018-2022 American Community Survey

East County

0 0.5 1 2 3 Miles



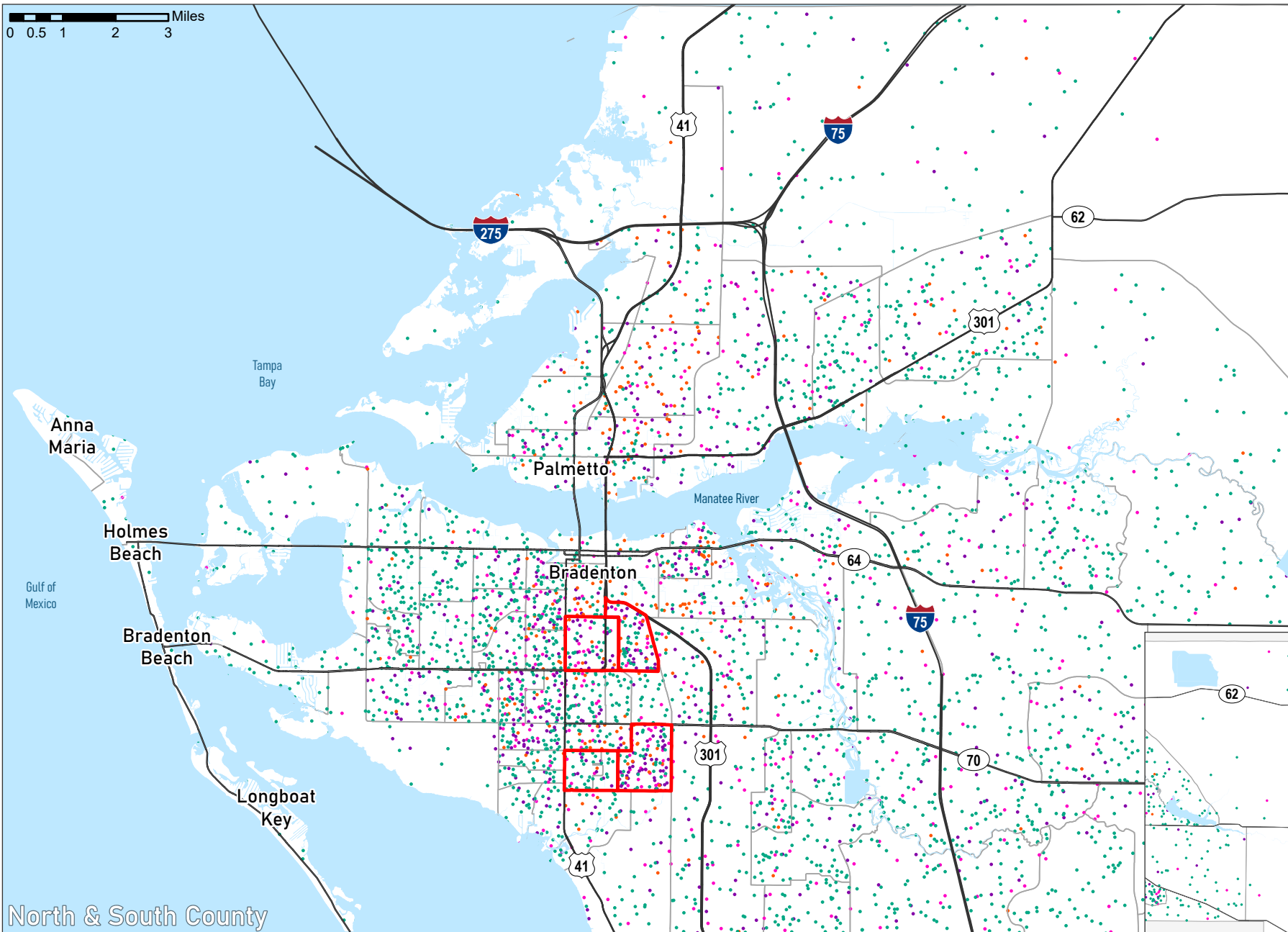
Analysis of Impediments to Fair Housing Choice



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North & South County

Population Density by Race/Ethnicity Manatee County, FL (Urban County)

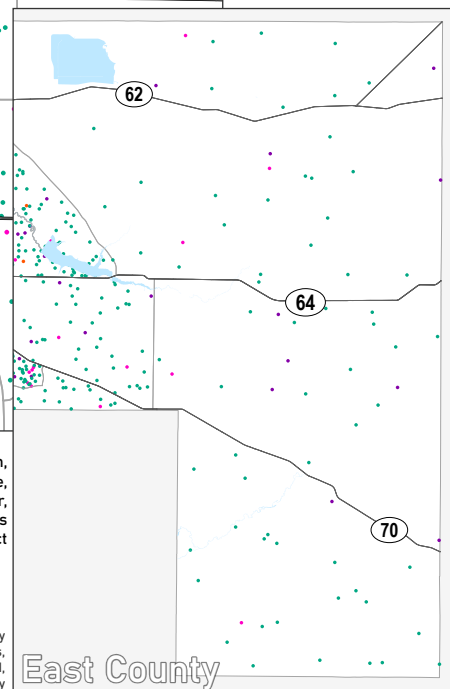
1 Dot = 100 Persons

State and U.S. Highways
R/ECAP*

White Alone
Black or African American Alone
Hispanic or Latino (Of Any Race)
Other Minority Races**

**Other Minority Race Includes Asian, American Indian and Alaska Native, Native Hawaiian and Pacific Islander, Some Other Race, and Two or More Races by Census Tract

*Racially & Ethnically Concentrated Areas of Poverty
Sources: U.S. Census TIGER/Line shapefiles, 2022 U.S. Census Tracts, 2020 HUD AFFH, 2018-2022 American Community Survey



East County