

21-92 - DRAFT V2 AI POMPANO BEACH
11.16.20.DOCX



PREPARED BY: The Florida Housing Coalition, Inc.

[This Page Intentionally Left Blank]

Table of Contents

Introduction	9
Summary of Findings.....	10
Community Profile	14
Demographic Data	15
Population.....	15
Sex.....	17
Age Groups.....	18
Retired Population	18
Race/Ethnicity	20
Racial and Ethnic Dissimilarities.....	20
Racially or Ethnically Concentrated Areas of Poverty.....	22
Familial Status.....	25
Disability.....	26
Foreign Born.....	28
Place of Birth for Foreign Born Residents.....	29
Limited English Proficiency	30
Employment and Economic Data.....	32
Household Income Distribution	32
Household Income by Race.....	34
Poverty	35
Low Poverty Index.....	36
Share of Workers by Industry	37
Employment Status by Disability	38
Unemployment	39
Potential Employment Impacts from COVID-19	41
Job Proximity Index.....	46
Labor Market Index.....	48
Educational Attainment	48
School Proficiency Index.....	50

Transportation	52
Transit Trips Index.....	52
Low Transportation Cost Index	53
Commuting Characteristics.....	53
Housing Data.....	55
Occupancy by Tenure and Vacancy	55
Owner-occupied units by Race/Ethnicity.....	57
Cost of Housing	58
Median Home Value	59
Median Rent.....	60
FMR and HOME Rents.....	61
Housing Cost Burden by Race/Ethnicity	62
Housing Affordability	63
Housing + Transportation Affordability Index	63
Housing Needs & Problems	64
Cost Burden by Tenure Status	65
Housing Problems by Race/Ethnicity	69
Severe Housing Problems	71
Publicly Supported Households	74
Evaluation of Jurisdiction’s Current Fair Housing Legal Status.....	78
Fair Housing Complaints or Compliance Reviews.....	79
Fair Housing Risk Management Process	81
Fair Housing Discrimination Suits Filed by Department of Justice	81
Hate Crimes Data	82
Reasons for any Trends or Patterns.....	82
Identification of Impediments to Fair Housing Choice	82
Public Sector	82
Zoning and Site Selection.....	83
PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders.....	87
Concentration of Voucher Holders	88
Sale of Subsidized Housing and Possible Displacement	90

Property Tax Policies.....	91
Planning and Zoning Boards.....	91
Building Codes (Accessibility).....	92
Private Sector – Lending Policies and Practices.....	95
2017 City Overview	96
Home Purchase Lending in Pompano Beach	98
Application Denial Reasons by Income Group.....	100
Pompano Beach’s Single-Family Lending Market, 2007-2017	102
Income, Race, and Single-Family Loan Denials in Pompano Beach.....	104
The Subprime Market	108
Private Lending Market Analysis Conclusion	113
Public and Private Sector	114
Fair Housing Enforcement	114
Complaint Process.....	115
Information Programs and Community Outreach.....	116
Visitability in Housing.....	117
Assessment of Current Public/Private Fair Housing Programs and Activities	118
Conclusions and Impediments.....	120
Impediments and Action Plan.....	121
Signature Page	124
Appendix	125

List of Tables & Figures

Figure 1. City of Pompano Beach Neighborhoods.	15
Figure 2. Population growth 2000 - 2018	17
Figure 3. Elderly population by census tract in City of Pompano Beach.	19
Figure 4. Predominant race/ethnic group by census tract, City of Pompano Beach.....	22
Figure 5. Location of R/ECAP tract in City of Pompano Beach.	23
Figure 6. Share of Black/African American population by census tract, City of Pompano Beach.	24
Figure 7. Share of Hispanic population by census tract, City of Pompano Beach.	25
Figure 8. Share of persons with a disability, City of Pompano Beach.....	28
Figure 9. Foreign born population by census tract, City of Pompano Beach.	30
Figure 10. Share of Limited English Proficiency population by census tract, City of Pompano Beach.....	32
Figure 11. Median Household Income by census tract, City of Pompano Beach.	34
Figure 12. Median household income by race/ethnicity, City of Pompano Beach.	35
Figure 13. Low Poverty Index Values by census tract, City of Pompano Beach.	37
Figure 14. Inflow/Outflow of Jobs, City of Pompano Beach.	38
Figure 15. Unemployment by race/ethnicity, City of Pompano Beach.	39
Figure 16. Unemployment rate in 2019, City of Pompano Beach.	40
Figure 17. Unemployment rate by census tract, City of Pompano Beach.	41
Figure 18. Tract share of workers in industries at risk from COVID-19.	45
Figure 19. Share of population by Black/African American and Hispanic workers, tracts with greatest share of at-risk workers.	46
Figure 20. Concentration of jobs, City of Pompano Beach.	47
Figure 21. Educational Attainment by race/ethnicity, City of Pompano Beach.	49
Figure 22. School Proficiency Index values by census tract, City of Pompano Beach.	51
Figure 23. Share of workers with a commute of more than an hour by tract, City of Pompano Beach. ...	54
Figure 24. Share of renter households by census tract, City of Pompano Beach.....	57
Figure 25. Estimated median value of an owner-occupied home.	60
Figure 26. Estimated median gross rent, City of Pompano Beach.....	61
Figure 27. Homeowner cost burden by census tract, City of Pompano Beach.	67
Figure 28. Renter cost burden by census tract, City of Pompano Beach.....	68
Figure 29. Assisted Housing Inventory property locations in City of Pompano Beach, FL.	77
Figure 30. Fair Housing discrimination cases in City of Pompano Beach, 2015 – 2020.....	80
Figure 31. Official Zoning Map, City of Pompano Beach.	84
Figure 32. Concentration of housing choice voucher holders by census tract, City of Pompano Beach. ..	89
Figure 33. CBPP composite index of opportunity and voucher utilization, City of Pompano Beach.	90
Figure 34. HMDA loan denial reasons by loan purpose.....	97
Figure 35. Lack of collateral as a share of refinance denials.	98
Figure 36. Composition of applicants by race/ethnicity.	99
Figure 37. HMDA loan single Family Home purchase denial rate.....	100
Figure 38. HMDA loan high income denial reasons by race/ethnicity.	101

Figure 39. HMDA loan low-income denial reasons by race/ethnicity.	101
Figure 40. HMDA single-family loan originations and application denials, City of Pompano Beach.....	102
Figure 41. HMDA single-family loan originations by purpose, City of Pompano Beach.	103
Figure 42. HMDA single-family loan origination share by purpose and 30-year average, City of Pompano Beach.....	104
Figure 43. HMDA single family denial rate by race/ethnicity overall, City of Pompano Beach.....	105
Figure 44. HMDA single family loan denial rate by applicant income group overall, City of Pompano Beach.	106
Figure 45. HMDA loan application share by neighborhood income group, City of Pompano Beach.....	107
Figure 46. HMDA loan application originations and denials by census tract income.	108
Figure 47. HMDA loan single family subprime mortgage originations, City of Pompano Beach.	109
Figure 48. HMDA loan subprime share by race/ethnicity overall, City of Pompano Beach.	110
Figure 49. HMDA loan conventional and nonconventional share of subprime total, City of Pompano Beach.	111
Figure 50. HMDA loan subprime originations by loan purpose.....	111
Figure 51. HMDA loan conventional versus nonconventional share overall, City of Pompano Beach. ...	112
Figure 52. HMDA loan conventional versus nonconventional Home Purchase, City of Pompano Beach.	112
Figure 53. HMDA loan conventional versus nonconventional Refinance, City of Pompano Beach.	113
Table 1: City of Pompano Beach and Broward County population in 2000, 2010 & 2018.....	16
Table 2: Count and share of persons by sex in U.S., Florida, Broward County, City of Pompano Beach. ...	17
Table 3: Count and share of persons by age in City of Pompano Beach, 2010 and 2018.	18
Table 4. Race/Ethnicity trends 1990, 2000, 2010, Current in City of Pompano Beach and CBSA.	20
Table 5. Racial/Ethnic Dissimilarities Index values by race/ethnicity, 1990, 2000, 2010, Current.	21
Table 6. Share of population by race/ethnicity, census tract 304.02.....	23
Table 7. Count of households by familial status, City of Pompano Beach.....	26
Table 8. Count and share of persons by type of disability, City of Pompano Beach and Broward County.	27
Table 9. Count and share of foreign-born persons and place of birth, City of Pompano Beach.....	29
Table 10. Count and share of persons by place of birth, City of Pompano Beach.....	29
Table 11. Count and share of population by Limited English Proficiency, City of Pompano Beach.	31
Table 12. Share of households by household income, City of Pompano Beach.....	33
Table 13. Poverty status in the past 12 months, City of Pompano Beach, Broward County, and Florida..	35
Table 14. Low Poverty Index values by race/ethnicity and poverty status, City of Pompano Beach and CBSA.	36
Table 15. Share of workers by industry, City of Pompano Beach.....	38
Table 16. Employed population by Disability status, City of Pompano Beach and Broward County.	39
Table 17. Unemployment rate, 2010 – 2019, City of Pompano Beach, Broward County, Florida.	40
Table 18. NAICS and Census industry class code crosswalk	43
Table 19. Count of employed persons by at-risk industry, City of Pompano Beach.....	43
Table 20. Number and share of workers at risk from COVID shutdown by census tract.	44

Table 21. Job Proximity Index values by race/ethnicity and poverty status, City of Pompano Beach.	46
Table 22. Labor Market Index values by race/ethnicity and poverty status, City of Pompano Beach.	48
Table 23. Educational attainment, City of Pompano Beach.	49
Table 24. School Proficiency Index values by race/ethnicity, City of Pompano Beach and CBSA.	51
Table 25. Transit Trips Index values by race/ethnicity and poverty status, City of Pompano Beach.	52
Table 26. Low Transportation Cost Index values by race/ethnicity and poverty status, City of Pompano Beach.	53
Table 27. Commuting method in City of Pompano Beach and Broward County.	54
Table 28. Worker travel time, 2010 and 2018, City of Pompano Beach.	54
Table 29. Tenure status and vacancy, City of Pompano Beach.	56
Table 30. Owner-occupied units by race/ethnicity, City of Pompano Beach.	58
Table 31. Cost of housing, City of Pompano Beach.	58
Table 32. Rent paid by number of units, City of Pompano Beach.	59
Table 33. FMR and HOME rents.	62
Table 34. Small Area FMRs by unit bedrooms, City of Pompano Beach.	62
Table 35. Greater Need: Housing Cost Burdens by AMI.	62
Table 36. Housing affordability by tenure status and income.	63
Table 37. Housing + Transportation Affordability Index combined cost of housing and transportation. ...	63
Table 38. Housing problems by number of households and income.	65
Table 39. Aggregate severe housing problems by number of households and tenure status.	65
Table 40. Cost Burden by tenure status and household composition.	66
Table 41. Severe Cost Burden by tenure status and household income.	69
Table 42. Disproportionately Greater Need, 0 – 30% AMI.	69
Table 43. Disproportionately Greater Need, 30 – 50% AMI.	70
Table 44. Disproportionately Greater Need, 50 – 80% AMI.	70
Table 45. Disproportionately Greater Need, 80 – 100% AMI.	71
Table 46. Severe Housing Problems, 0 - 30% AMI.	72
Table 47. Severe Housing Problems, 30 – 50% AMI.	72
Table 48. Severe Housing Problems, 50 – 80% AMI.	73
Table 49. Severe Housing Problems, 80 – 100% AMI.	73
Table 50. Year unit built by tenure status.	Error! Bookmark not defined.
Table 51. Overcrowding 1 of 2.	Error! Bookmark not defined.
Table 52. Overcrowding 2 of 2.	Error! Bookmark not defined.
Table 53. Voucher holders and public housing residents by race/ethnicity, Housing Authority of Pompano Beach.	74
Table 54. Basis for Housing Discrimination Cases in City of Pompano Beach, 2015-2020.	79
Table 55. Basis for housing discrimination cases in U.S., Florida, City of Pompano Beach, 2018.	80
Table 56. Hate Crime data 2016, 2017, 2018, City of Pompano Beach, Broward County, Florida.	82
Table 57. Disposition of HMDA applications by Loan Type and Purpose.	97
Table 58. HMDA loan home purchases by type.	98
Table 59. How to file a housing discrimination complaint, City of Pompano Beach.	116

Introduction

The City of Pompano Beach receives federal funding from the U.S. Department of Housing and Urban Development (HUD) to conduct housing and community development activities under 24 CFR Part 91: the Consolidated Planning process. The Consolidated Planning process combines planning and reporting requirements for major federal grants such as the Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME), both programs received by the City of Pompano Beach. As a recipient of entitlement funding from HUD, the City of Pompano Beach is required to submit a certification to HUD that it will affirmatively further fair housing. This certification requires the completion of an Analysis of Impediments (AI) to Fair Housing Choice.

HUD has a commitment to eliminate discriminatory practices in housing and an obligation under Section 808 of the Fair Housing Act (FHA) to encourage the adoption and enforcement of fair housing laws in federally funded housing and community development programs. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and regulations in 24 CFR part 1, prohibit discrimination in any program or activity funded in whole or in part by federal funds made available under this part. In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, which prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within CDBG programs or activities. In addition to federal anti-discrimination statutes, the Broward County Human Rights Act (Broward County Code, Chapter 16½) establishes anti-discrimination requirements at the local level, including protections for the following classes: race, color, religion, sex, national origin, age, disability, familial status, marital status, political affiliation, sexual orientation, pregnancy, gender identity or expression, veteran status, being a victim of domestic violence, source of income, and retaliation.

To satisfy the certification requirement, and in pursuit of equal access to opportunity and affirmative enforcement of the FHA, the City of Pompano Beach contracted with the Florida Housing Coalition, Inc. to develop this AI. The City of Pompano Beach will monitor progress made on the plan and assess fair housing challenges and opportunities over the next five years.

Purpose of the Report

Equal access to housing is fundamental to the health, livelihood, and success of each person, and an important component in the long-term sustainability of local communities across the country. Strong enforcement and affirmative outreach on fair housing law and policy strengthens pursuit of personal, educational, and employment goals at the individual level, and supports equitable access to opportunities in the community. Because housing is so critical to personal development, fair housing is a goal that public officials and private citizens must embrace for a vision of equality of opportunity to become a reality. In recognition of equal housing access as an essential right, the federal government, the state of Florida, and Broward County have all established fair housing choice as a right protected by law. Fair housing, while required by law and a moral issue, is also an economic issue. No community can reach its full potential for economic growth and well-being if its residents are unable to participate fully in the housing market. Segregated housing causes unequal education, unequal access to jobs, and unequal income. Studies have

clearly shown the relationship between housing, education, jobs, and the ability to build equity through home ownership. Home-seekers who do not have access to all of the available housing choices may not be able to take advantage of living in neighborhoods that provide access to opportunity.

Just as the federal, state, and County governments have recognized the fundamental importance of equal access to housing, so does the City of Pompano Beach.

This report analyses impediments to fair housing choice including any actions, omissions or decisions taken because of a protected class under the FHA, or any other arbitrary factor which restricts housing choices or the availability of housing choices. Pursuant to HUD regulations (24CFR91.225(a)), in order to receive entitlement funds each entitlement jurisdiction must certify that it will affirmatively further fair housing (AFFH) through Fair Housing Planning. Fair Housing Planning entails:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI).
- Implementation of action plans to eliminate any identified impediments.
- Maintenance of AFFH records corresponding with implementation of the Consolidated Plan every three to five years.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in jurisdictions and working toward its elimination.
- Promoting fair housing choice for all people.
- Providing racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities.
- Fostering compliance with nondiscrimination provisions of the FHA.

This report analyzes conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and limit access to opportunity and developing solutions to mitigate or remove such impediments.

Summary of Findings

Through a comprehensive review of data and policies, this report identified the following findings:

1. Demographics
 - a. The Blanche Ely neighborhood is highly segregated by race and has a high poverty rate. Specifically, the neighborhood has one racially/ethnically concentrated area of poverty (R/ECAP). Tract 304.02 is 89.73% Black/African American with a 40% poverty rate (Figure 5. Location of R/ECAP tract in City of Pompano Beach.).
 - b. The City has a growing Hispanic population, growing from 6.8% to 17.5% of the population between 1990 and 2018. This population growth is concentrated in census tracts west of

Interstate-95 (Table 4. Race/Ethnicity trends 1990, 2000, 2010, Current in City of Pompano Beach and CBSA.).

- c. Persons with an ambulatory difficulty represent the largest share of persons with a disability in the City. There are substantial concentrations of persons with disabilities along the coast and in the Blanche Ely neighborhood (Figure 8. Share of persons with a disability, City of Pompano Beach.).
- d. Latin America is the place of origin for a significant majority (78.9%) of the foreign-born population (Table 9. Count and share of foreign-born persons and place of birth, City of Pompano Beach.).

2. Employment and Economics

- a. Just under half of all households (48.5%) earn \$49,999 or less (Table 12. Share of households by household income, City of Pompano Beach.).
- b. Black/African American households earn 74.9% of the median household income earned by White households - \$46,821 for Black/African American households compared to \$62,496 for White households (Figure 12. Median household income by race/ethnicity, City of Pompano Beach.).
- c. Workers in the City are highly vulnerable to job loss as a result of COVID-19 related shutdowns (Table 19. Count of employed persons by at-risk industry, City of Pompano Beach.).
- d. Blacks/African Americans are highly exposed to poverty (Table 14. Low Poverty Index values by race/ethnicity and poverty status, City of Pompano Beach and CBSA.).
- e. Persons with a disability have higher rates of unemployment compared to the non-disabled population – 16.9% employed with a disability compared to 64% without a disability (Table 16. Employed population by Disability status, City of Pompano Beach and Broward County.).
- f. Black/African American households in the City are substantially less competitive in the labor market, as measured by the Labor Market Index, compared to other racial/ethnic groups (Table 22. Labor Market Index values by race/ethnicity and poverty status, City of Pompano Beach.).
- g. Blacks/African American households have the lowest degree of educational attainment of any racial/ethnic group in the City (Figure 21. Educational Attainment by race/ethnicity, City of Pompano Beach.).

3. Housing

- a. For households earning between 0 – 80% AMI, 75% of renters and 50% of homeowners are cost burdened (Table 35. Greater Need: Housing Cost Burdens by AMI.).
- b. White, non-Hispanic persons in the City of Pompano Beach reside in 72.4% of owner-occupied housing units compared to 13.9% for Blacks/African Americans and 11.6% by Hispanics (Table 30. Owner-occupied units by race/ethnicity, City of Pompano Beach.).
- c. Approximately 57.5% of Black/African American households are housing cost burdened. (Table 45. Disproportionately Greater Need, 80 – 100% AMI.).
- d. Over 90% of public housing choice vouchers are held by Blacks/African Americans (

Pompano Beach	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1	20.00%	4	80.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	58	50.00%	24	20.69%	32	27.59%	1	0.86%
Other Multifamily	3	4.76%	55	87.30%	5	7.94%	0	0.00%
HCV Program	71	7.95%	822	92.05%	N/a	N/a	N/a	N/a

Source: HUD AFFHT0004, Table 6 - Publicly Supported Households by Race/Ethnicity, November 2017; HAPB
Data Note: Numbers presented are numbers of households not individuals.

- e. Table 50. Voucher holders and public housing residents by race/ethnicity, Housing Authority of Pompano Beach.).
 - f. 12 of 22 assisted/subsidized housing properties are located in majority-minority and high poverty Census tracts (Figure 29. Assisted Housing Inventory property locations in City of Pompano Beach, FL.).
4. Housing Discrimination
- a. There are few formal fair housing complaints, with a majority based on disability (Table 51. Basis for Housing Discrimination Cases in City of Pompano Beach, 2015-2020.).
 - b. Compared to the State, there is a disproportionate share of fair housing cases on the basis of national origin (Table 52. Basis for housing discrimination cases in U.S., Florida, City of Pompano Beach, 2018.).
5. Public Sector Impediments
- a. Tenant based vouchers administered by the Housing Authority of Pompano Beach are concentrated in low opportunity and segregated communities (Figure 33. CBPP composite index of opportunity and voucher utilization, City of Pompano Beach.)
 - b. The City of Pompano Beach’s Planning & Zoning board by-laws have no special consideration for protected class participation (Planning and Zoning Boards).
6. Lending & private sector
- a. Blacks/African American applicants have a low loan participation rate (13%) compared to White applicants (62%) (Figure 36. Composition of applicants by race/ethnicity.).
 - b. Blacks/African American applicants have the highest rate of single-family home loan denials for each year from 2007 to 2017 (Figure 43. HMDA single family denial rate by race/ethnicity overall, City of Pompano Beach.).
 - c. Black/African American and Hispanic applicants are more than twice as likely to have a subprime loan compared to White applicants (Figure 48. HMDA loan subprime share by race/ethnicity overall, City of Pompano Beach.).

Given the findings listed above, the Impediments and Action Plan section details the actions that the City of Pompano Beach will pursue to affirmatively further fair housing.

#	Impediment	Actions
1	<p>Lack of awareness by residents and landlords of fair housing laws, especially for Hispanics and foreign born.</p> <p>High number of fair housing complaints on the basis of disability.</p>	<ol style="list-style-type: none"> 1. Partner with a fair housing training/outreach organization by offering funding and programming support to provide fair housing training to landlords on fair housing laws specific to persons with a disability, foreign born and limited English proficient populations. 2. Provide fair housing trainings to the public and invited organizations, with special focus on the R/ECAP and census tracts with a large share of Hispanic and foreign-born residents. 3. Place flyers and fair housing information in public facilities. 4. Conduct targeted outreach and education to landlords in high opportunity/low poverty areas. 5. Advertise April Fair Housing Month and make public announcements regarding opportunities to learn about fair housing. 6. Include the HUD fair housing logo on all housing program related documents.
2	<p>Insufficient supply of affordable rental and homeowner housing in high opportunity census tracts</p>	<ol style="list-style-type: none"> 1. Partner with a Community Land Trust (CLT) and support its operations with quality City-owned surplus lands, unrestricted operating funds, and development subsidies. 2. Once partnered, concentrate CLT investment in properties located in census tracts in the Eastern half of the City. 3. Execute on proposed Policy 03.01.08 in the Comprehensive Plan update (ADUs), and develop grant program for supporting development of ADUs in high opportunity neighborhoods on the Eastern half of the City. 4. Coordinate annual review of FHFC RFAs and identify deployable City and private resources to ensure applications are submitted to relevant RFA opportunities. 5. Prioritize allocation of infrastructure improvement projects in R/ECAP and majority-minority census tracts. 6. Research establishing a mandatory inclusionary zoning ordinance in high opportunity neighborhoods undergoing significant redevelopment. 7. Implement a rental assistance strategy for extremely low-income renters, including, households experiencing homelessness.
3	<p>Low median household income, high poverty rate, high unemployment for Black/African American and Hispanic households relative to White and Asian households</p>	<ol style="list-style-type: none"> 1. Establish formal task force on economic opportunity for minority households with a focus on developing, implementing, and sustaining City initiatives focused on economic development and economic opportunity for Black/African American and Hispanic households.
4	<p>Concentration of housing vouchers in segregated and high poverty neighborhoods.</p>	<ol style="list-style-type: none"> 1. Conduct outreach and training to landlords in Pompano Beach on fair housing protections at the local level, especially on source of income discrimination. 2. Facilitate coordination between the HAPB and the City of Pompano Beach, with a focus on landlord recruitment and mobility counseling for voucher holders.
5	<p>Poor credit history and collateral as barrier to accessing traditional capital and wealth building through homeownership,</p>	<ol style="list-style-type: none"> 1. Expand access to credit counseling services for low-income and protected classes by partnering with a credit counseling

#	Impediment	Actions
	especially for Black/African American residents.	agency and conducting outreach to R/ECAP and majority-minority census tracts.

Community Profile

The goal of the Community Profile is to provide data and analysis to help guide decision makers in the City of Pompano Beach towards the adoption of policies and practices that address impediments to fair housing choice and utilize CDBG and HOME funding for strategies that have the greatest impact for low- and moderate-income residents and persons protected by fair housing laws.

The Community Profile and Demographic Data is divided into three sections:

The first section is the Demographic Profile, which looks at the City from the perspective of its people. Race and ethnicity, age, disability status, and other variables are explored. This section provides the foundation to determine who lives in the jurisdiction and what their needs are, including housing demand.

The second section, the Economic Profile, looks at the job market and the financial environment for residents. Factors like income, employment status, and poverty are analyzed and compared to factors in the demographic analysis to determine if disparities exist between racial and ethnic groups and persons with disabilities.

The third section is the Housing Profile, an overview of the City's housing stock. Multiple housing variables are explored, including home values, rents, occupancy, and age of housing to provide a snapshot of the physical environment of region. This section establishes the supply of the available housing, including affordable housing, and the degree to which it meets demand.

Together, these pieces provide a data-driven view of the jurisdiction that will advance fair housing planning efforts and help identify impediments to fair housing choice.

Throughout this analysis, local neighborhood names are used to refer to areas of the City. For reference, neighborhoods in the City of Pompano Beach are identified on the map below.

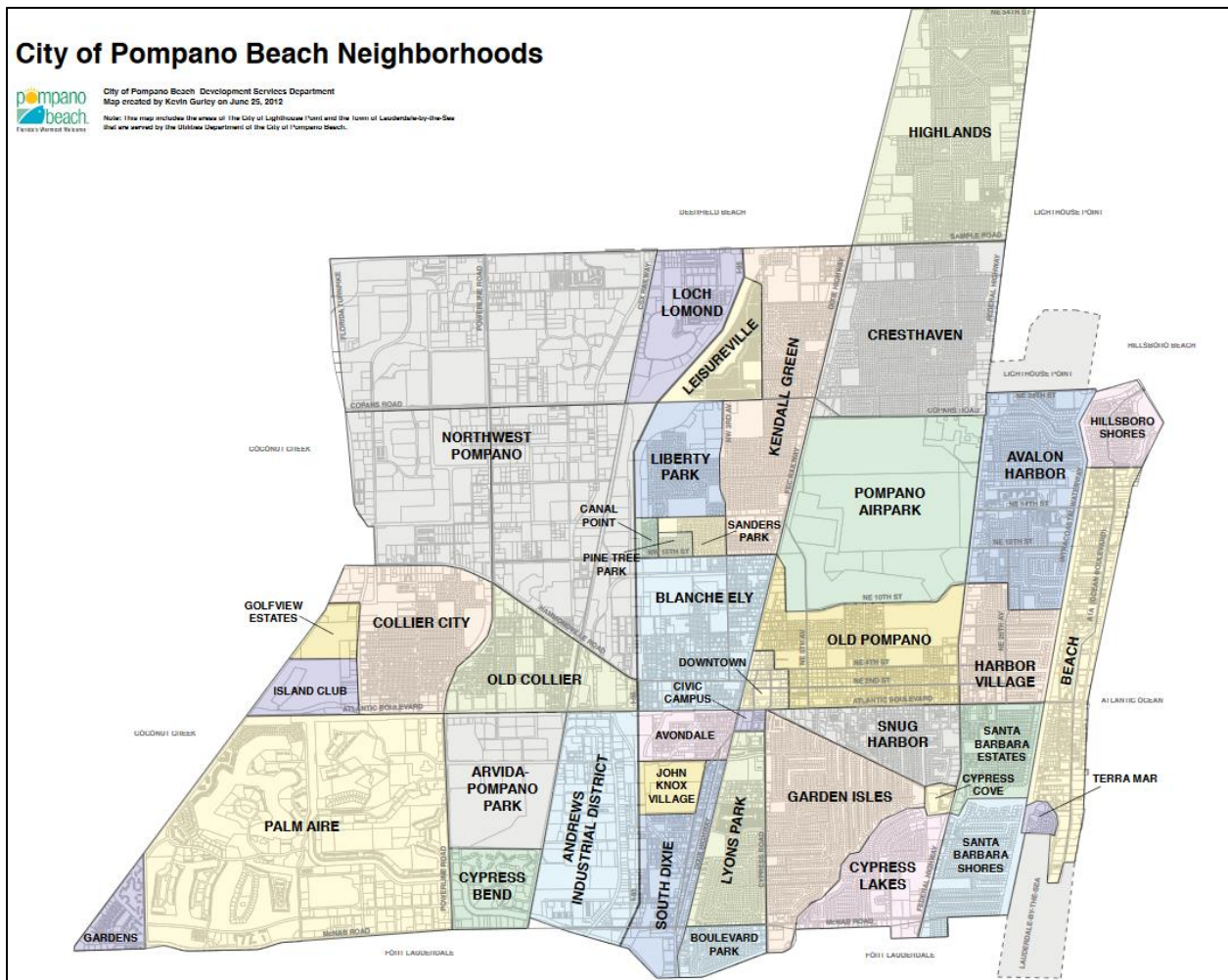


Figure 1. City of Pompano Beach Neighborhoods.

Source: City of Pompano Beach.

Demographic Data

The Demographic Profile looks at the City from the perspective of its people. Understanding who lives throughout the jurisdiction, where they live, and how that has changed provides a starting point for identifying factors that contribute to fair housing choice. This process requires exploring several demographic variables for protected class groups such as race and ethnicity, age, disability status, and others. This information allows the City to answer one of the most important questions when addressing fair housing issues, who needs assistance. Understanding the demographics of the City and how they have changed is necessary before policy can be implemented.

Population

Understanding how the population has changed over time is one of the most important demographic data points available. This change gives a broad view of whether the area is a place experiencing growth. A

growing population usually represents a place that is attractive to new households while a shrinking or stable population may mean resident needs are not being met.

In Pompano Beach, the population has grown by nearly 40% since 2000. This growth rate outpaces Broward County by over 20%. Most of the growth occurred between 2000 and 2010 when the population increased by an average of 2,223 people per year. Growth was slower between 2010 and 2018 with approximately 1,055 people per year.

Population growth is generally a positive indicator but with it comes challenges, particularly for the housing market. When population grows faster than housing stock the overall demand increases which puts upward pressure on housing prices. Increased prices make it more difficult to locate affordable, safe, and secure housing, particularly for lower income households.

	2000	2010	2018	2000 - 2010		2010 - 2018	
				% Change	Difference	% Change	Difference
Pompano Beach	78,191	100,417	108,855	28.4%	22,226	8.4%	8,438
Broward County	1,623,016	1,748,066	1,909,151	7.7%	125,050	9.2%	161,085
Source: 2000, 2010 Decennial Census, 2014-18 5-Year ACS table DP05							

Table 1: City of Pompano Beach and Broward County population in 2000, 2010 & 2018.

The change in population by census tract can be a valuable data point to determine what areas of the jurisdiction people are leaving or moving to. In the last two decades, the population has changed inconsistently. Many tracts experienced significant growth with the population increasing by 20% or more, especially further inland. There are a fair number of tracts that declined in population by over 10%. Tracts that saw a population decline are located along the beach and north of Atlantic Blvd heading West to approximately the intersection of North Andrews Avenue and E. Atlantic Avenue.

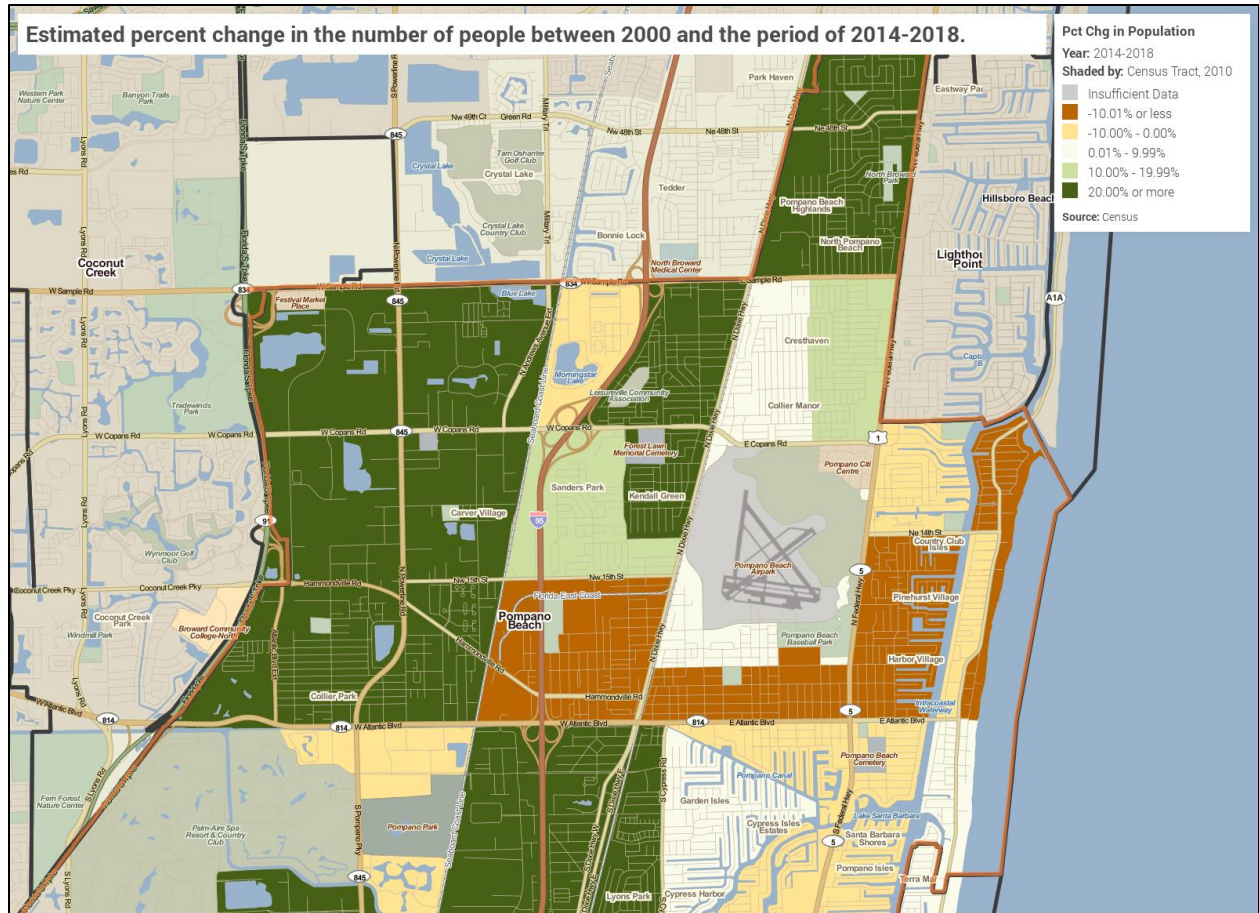


Figure 2. Population growth 2000 - 2018

Source: 2018 5-year ACS via PolicyMap

Sex

The City of Pompano Beach has approximately 3,900 more males than females, representing a 3.6% difference of the total population. This figure is noticeably different than the county, state, or national demographics where women are the majority. Nationally, males make up 49.2% of the population, statewide they are 48.9%, and countywide the population is 48.7% male.

	U.S.		Florida		Broward County		Pompano Beach	
	#	%	#	%	#	%	#	%
Total:	322,903,030	--	20,598,139	--	1,909,151	--	108,855	--
Male	158,984,190	49.2	10,071,925	48.9	929,712	48.7	56,402	51.8
Female	163,918,840	50.8	10,526,214	51.1	979,439	51.3	52,453	48.2

Source: 2014-2018 ACS 5-Yr Estimates (DP05)

Table 2: Count and share of persons by sex in U.S., Florida, Broward County, City of Pompano Beach.

Age Groups

People can face discrimination on the basis of their age. Age discrimination may be directed to persons considered young or to the elderly. In both cases, landlords, real estate brokers, and lenders make assumptions about behavior and financial capability in a discriminatory way.

The age distribution of a City is vitally important to the housing market and a jurisdiction’s economy. The needs of residents can vary significantly depending on what stage of life they are in. Residents nearing or in retirement often seek to downsize into smaller homes and may prioritize accessibility and transportation options over other amenities. Young adults, particularly new families, have different housing demands and tend to look for homes they can grow into. Understanding how the age of the population is changing is important for determining demand for certain housing types and helps set realistic fair housing goals for the City.

The median age in Pompano Beach in 2018 was 42.3 years, the same as it was in 2010 and nearly matching the state’s median age of 42.2 years. Nearly 27% of the city’s population is under the age of 25 and 19.6% are over the age of 65. The two fastest growing age groups are the 5 to 9 years old and 25 to 34 years old groups, both of which grew by approximately 25% from 2010 to 2018. There were three age groups whose population shrank between 2010 and 2018. The number of residents 15 to 19 years old shrank by 750 people, the 35 to 44 age group decreased by 1,108, and the 45 to 54-year-old group fell by 749.

	2010		2018	
	Number	Percent	Number	Percent
Under 5 years	5,491	5.50%	6,241	5.70%
5 to 9 years	4,580	4.60%	5,791	5.30%
10 to 14 years	5,535	5.50%	5,888	5.40%
15 to 19 years	5,740	5.70%	4,990	4.60%
20 to 24 years	5,567	5.50%	5,951	5.50%
25 to 34 years	12,692	12.60%	15,819	14.50%
35 to 44 years	14,315	14.30%	13,207	12.10%
45 to 54 years	15,770	15.70%	15,021	13.80%
55 to 59 years	6,522	6.50%	7,711	7.10%
60 to 64 years	5,825	5.80%	6,867	6.30%
65 to 74 years	8,319	8.30%	9,899	9.10%
75 to 84 years	6,290	6.30%	6,956	6.40%
85 years and over	3,771	3.80%	4,514	4.10%
Median Age	42.3	(X)	42.3	(X)
Source: 2006-2010, 2014-2018 ACS 5-Yr Estimates (S0101)				

Table 3: Count and share of persons by age in City of Pompano Beach, 2010 and 2018.

Retired Population

Like many communities in Florida, Pompano Beach has a large population of retired adults. People aged 65 and over have particularly important housing needs. As people age, their need for social services, healthcare, and housing changes. Central to these evolving needs is access to housing options that are

decent, safe, affordable, accessible, and located in proximity to services, amenities, and transportation. Housing is one of the most essential needs of the elderly because the affordability, location, and accessibility of where they live will directly impact their ability to access health and social services – both in terms of financial cost and physical practicality, and to lead a quality life.

In 2018, residents 65 years old and older made up 19.6% of the City’s population. The living patterns of this population show a significant concentration of residents along the coastal areas of the City. These same tracts were also some of the tracts where the population decreased since 2000, often by 20% or more.

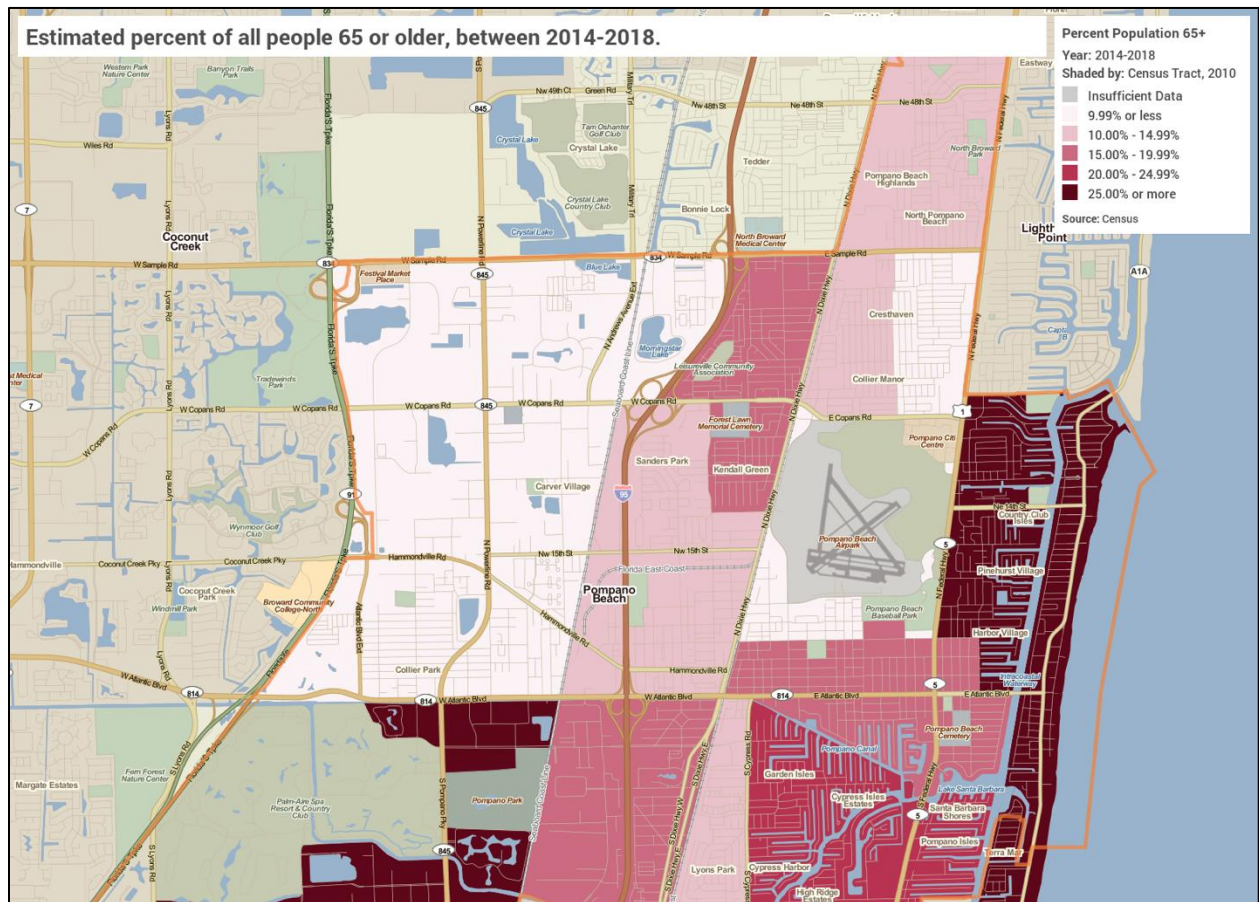


Figure 3. Elderly population by census tract in City of Pompano Beach.

Source: 2014-18 5-year ACS estimated via PolicyMap.

Race/Ethnicity

The City of Pompano Beach does not have a single majority racial or ethnic group. The largest group, White non-Hispanic, makes up 43.1% of the population. When compared to the County, the City has larger White and Black/African American populations but the remainder of the groups are smaller.

Pompano Beach has seen a steady increase in the non-White population since 1990. According to the data provided by HUD, White, non-Hispanic residents currently make up approximately 51% of the population. In 1990, they made up nearly 69% of the population. The largest increase has been among Hispanic residents, a group growing from 6.8% to 17.5% of the total population during this time period.

The region (the Miami-Fort Lauderdale-West Palm Beach core based statistical area, CBSA) shows a similar pattern, but the non-White population is larger. In fact, currently Hispanic residents make up a plurality of the population and White residents are the second largest group. White, non-Hispanic residents decreased from 54.45% of the population in 1990 to 34.83% currently.

	Pompano Beach							
	1990 Trend		2000 Trend		2010 Trend		2018	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	63,822	68.83%	59,226	59.47%	50,697	50.78%	50,697	50.78%
Black, Non-Hispanic	21,577	23.27%	26,017	26.12%	28,864	28.91%	28,097	28.14%
Hispanic	6,345	6.84%	11,798	11.85%	17,455	17.48%	17,455	17.48%
Asian or Pacific Isl.	668	0.72%	1,192	1.20%	1,511	1.51%	1,277	1.28%
Native American	130	0.14%	371	0.37%	338	0.34%	188	0.19%
	CBSA - Region							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	2,208,676	54.45%	2,205,570	44.04%	1,937,939	34.83%	1,937,939	34.83%
Black, Non-Hispanic	659,003	16.25%	961,196	19.19%	1,137,108	20.43%	1,096,536	19.71%
Hispanic	1,127,860	27.80%	1,703,701	34.02%	2,312,929	41.56%	2,312,928	41.56%
Asian or Pacific Isl.	48,571	1.20%	98,436	1.97%	141,246	2.54%	123,823	2.23%
Native American	4,905	0.12%	11,913	0.24%	12,780	0.23%	7,579	0.14%
Data Sources: 1990, 2000, 2010 Decennial Census, (Current) ACS (HUD AFFHT0004, Table 3 - Racial/Ethnic Dissimilarity Trends)								

Table 4. Race/Ethnicity trends 1990, 2000, 2010, Current in City of Pompano Beach and CBSA.

Racial and Ethnic Dissimilarities

According to the Racial/Ethnic Dissimilarity trends provided by HUD, segregation is less prevalent in the City of Pompano Beach than the region as a whole. The dissimilarity index measures the extent to which there is an evenness in distribution of two racial or ethnic populations across a specific geographic area. The index is commonly used to represent the level of segregation between two groups in a census tract,

whereby values from 55 to 100 indicate a high level of segregation. Values between 40 to 54 show moderate levels of segregation and those between 0 to 39 indicate low segregation. Based on the non-White/White dissimilarity index, the overall segregation level in the City and the region is at 53.98 and 56.44, respectively. Black and White residents in Pompano Beach show a high level of segregation. Hispanic individuals in the City have a moderate degree of segregation and a high degree of segregation in the region.

Racial/Ethnic Dissimilarity Index	Pompano Beach				Region			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	65.84	56.57	50.85	53.98	61.70	57.05	54.36	56.44
Black/White	78.34	71.54	64.02	68.20	73.77	68.51	63.95	67.31
Hispanic/White	35.69	36.57	38.56	40.88	63.56	59.01	57.36	58.38
Asian or Pacific Islander/White	27.98	22.63	20.86	28.14	32.29	32.08	32.71	37.99

Source: Brown Longitudinal Tract Database based on 1990, 2000, 2010 Decennial Census, (Current) ACS (HUD AFFHT0004, Table 3 - Racial/Ethnic Dissimilarity Trends)

Table 5. Racial/Ethnic Dissimilarities Index values by race/ethnicity, 1990, 2000, 2010, Current.

The following map shows the predominant race or ethnicity by census tract in the City. In Pompano Beach, race and ethnicity appears to be linked to where a person lives. There are many tracts with a disproportionate representation of different groups. One tract in the center of the City is over 90% Black and all coastal tracts are over 70% White.

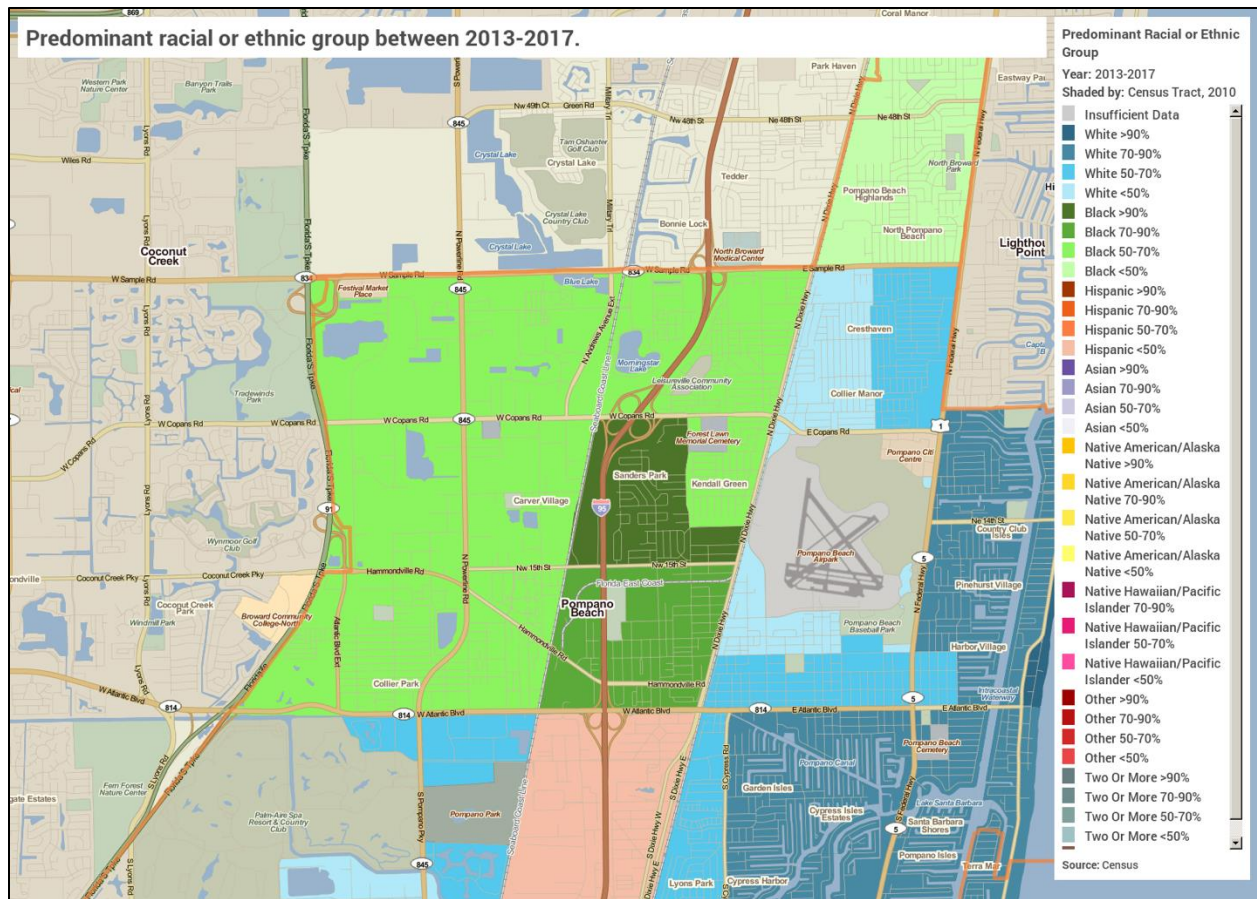


Figure 4. Predominant race/ethnic group by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimates via PolicyMap.

Racially or Ethnically Concentrated Areas of Poverty

Federal housing policy intentionally segregated housing by race for decades. Those policies, as well as the many local and state discrimination policies, are no longer legal, but many communities still feel their effects in de facto segregation. An unfortunate truth is that within the United States there is a link between a person's race or ethnicity and their access to housing and economic opportunities. Many areas of the country have been classified as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). R/ECAPs are census tracts where more than half of the population is non-White and 40% or more of the population is in poverty or where the poverty rate is greater than three times the average poverty rate in the area.

HUD identifies one R/ECAP (Racially/Ethnically Concentrated Areas of Poverty) within the city limits of Pompano Beach. The total population contained within this identified R/ECAP is 3,584, approximately 3.2% of the total population of the City.

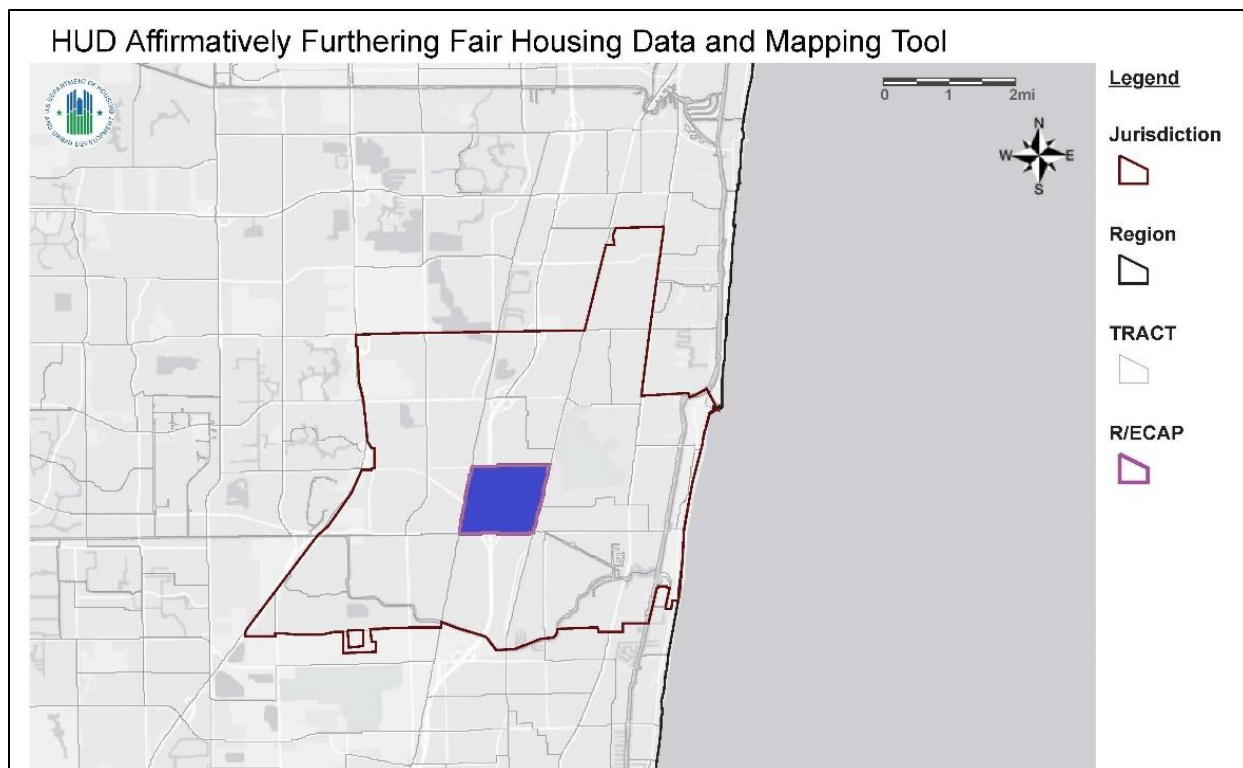


Figure 5. Location of R/ECAP tract in City of Pompano Beach.

Source: HUD AFFHT0004

In Pompano Beach, the Blanche Ely neighborhood has a large concentration of Black/African American households, including one census tract meeting the definition of a R/ECAP. This neighborhood is composed of two tracts with 80% or more Black/African American residents. This is a sharp contrast to neighboring tracts where less than half the population is Black/African American. From a fair housing policy-making perspective, this neighborhood demands particular attention because of the high poverty rate and segregated conditions.

Below is a detailed listing of the census tract identified in the R/ECAP and its racial/ethnic composition and poverty rate.

census tract	Racial Composition % of Total Population						Poverty Rate
	White	Black	Native Amer	Asian/Pac Isl	Hispanic	Multi-Race, Non-Hispanic	
304.02	1.34%	89.73%	.1%	.1%	7.55%	1.1%	40.3%

Table 6. Share of population by race/ethnicity, census tract 304.02.

Proactively addressing the connection between race, housing, and poverty is a necessary part of any housing program. If areas remain segregated and maintain high rates of poverty, residents are likely to suffer from lower access to high quality infrastructure, lower availability of public services like banking, grocery stores, libraries, and recreational opportunities.

Racial concentrations of Black/African American and Hispanic persons primarily correspond with the R/ECAP in the City with additional higher concentrations of Black/African American and Hispanic populations also indicated in the tract directly north of the R/ECAP.

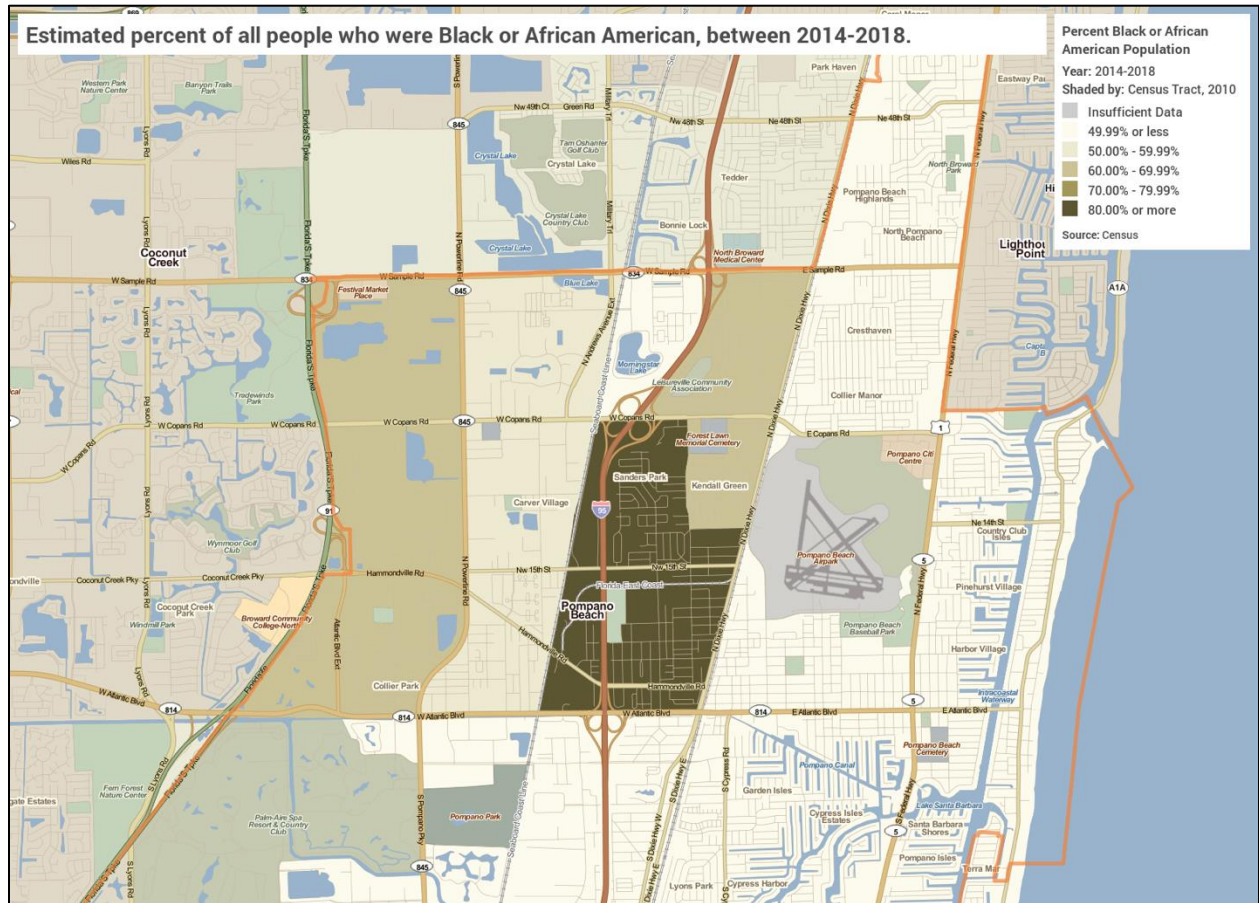


Figure 6. Share of Black/African American population by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS via PolicyMap.

In the City of Pompano Beach, the Hispanic population is relatively desegregated, with some pockets of concentration. Most noticeably is the low presence of Hispanic residents in coastal tracts. On the other hand, tracts with a relatively large Hispanic population (over a quarter being ethnically Hispanic), are located to the West of I-95 and south of Atlantic Blvd.

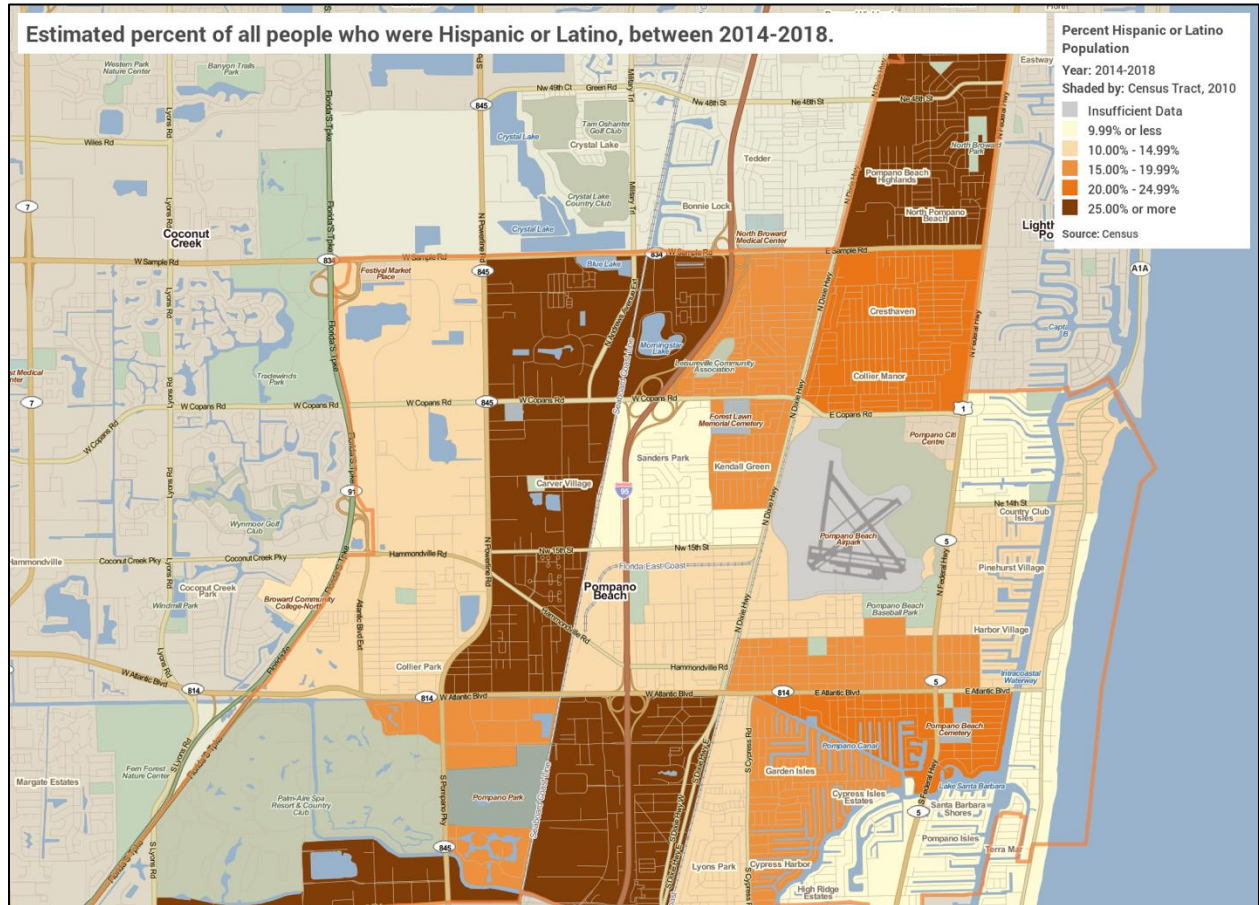


Figure 7. Share of Hispanic population by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS via PolicyMap.

Familial Status

Familial status, or households with children under the age of 18, is a protected class under the Fair Housing Act, and holds long-term policy implications for housing development, land use, and regulations. The most common household status found in Pompano Beach is the nonfamily household, which makes up 44.8% of all households. Nonfamily households, such as persons living alone or with nonrelatives only, also have the smallest household size, an average of 1.4 people. Among families, married couple families are the most common. Single-female households have an average household size much larger than other family types.

	Total	Married Couple Family Household	Single-Male, (no wife) Household	Single-Female (no husband) Household	Nonfamily Household
Households					
Total households	41,116	14,617	2,413	5,663	18,423
Avg household size	2.62	3.2	3.88	4.65	1.37
Families					
Total families	22,693	14,617	2,413	5,663	(X)
Avg family size	3.47	3.14	3.48	4.3	(X)
Source: 2014-2018 ACS 5-Yr Estimates (S1101)					

Table 7. Count of households by familial status, City of Pompano Beach.

Disability

People with disabilities are a protected class under the Fair Housing Act and state and local fair housing ordinances. Persons with disabilities face a wide range of housing discrimination challenges based on reasonable accommodations in rental property and homeownership units, along with other discrimination. In a 2017 study conducted by HUD’s Office of Policy Development and Research, researchers found that people with intellectual and developmental disabilities faced a negative stigma from housing providers and their agents; inappropriate requests to disclose personal, disability, and health related information; a lack of understanding about reasonable accommodations; and steering towards specific housing based on an individual's disability. People with disabilities, matched with people without disabilities to control for income, race, gender, and age, were dramatically less likely to receive responses to their inquiries about housing, were more likely to be told that advertised units were not available, were more likely to be steered away from the unit and less likely to be offered a tour of the unit.

Residents who have a disability face additional challenges, particularly when it comes to housing. Finding affordable housing is even more difficult for those who need units that have or can be modified for wheelchairs, shower supports, ramps, and other accessibility aides. Communities with a relatively large elderly population should focus on this issue due to the close relationship between age and disability.

The barriers to equal and fair access to housing based due to a disability depends on the nature of the disability. Persons with a vision difficulty face a different set of fair housing challenges compared to persons with a cognitive difficulty, for instance. In Pompano Beach, the greatest share of persons with a disability are those with an ambulatory difficulty – those with difficulties moving unassisted without the aid of certain devices like a wheelchair or cane. The second highest share of persons with a disability is persons with an independent living difficulty. This group of persons includes those with a disability because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.

	Broward County		Pompano Beach	
	#	%	#	%
Hearing difficulty	51,099	2.7%	4,190	4.0%
Vision difficulty	40,047	2.1%	3,010	2.9%
Cognitive difficulty	76,955	4.3%	4,627	4.7%
Ambulatory difficulty	115,077	6.4%	7,752	7.8%
Self-care difficulty	45,775	2.6%	3,005	3.0%
Independent Living difficulty	78,869	5.3%	5,099	6.1%
Source: 2014-2018 5-yr Estimates (S1810)				

Table 8. Count and share of persons by type of disability, City of Pompano Beach and Broward County.

The map below shows the distribution of people with a disability in Pompano Beach. Like many of the variables studied in this analysis, the concentration of people with a disability is spread across the City. There are many tracts with a high disability rate (28% or over) and some with low rates, less than 9%. Coastal areas with a large elderly population also have higher disability rates.

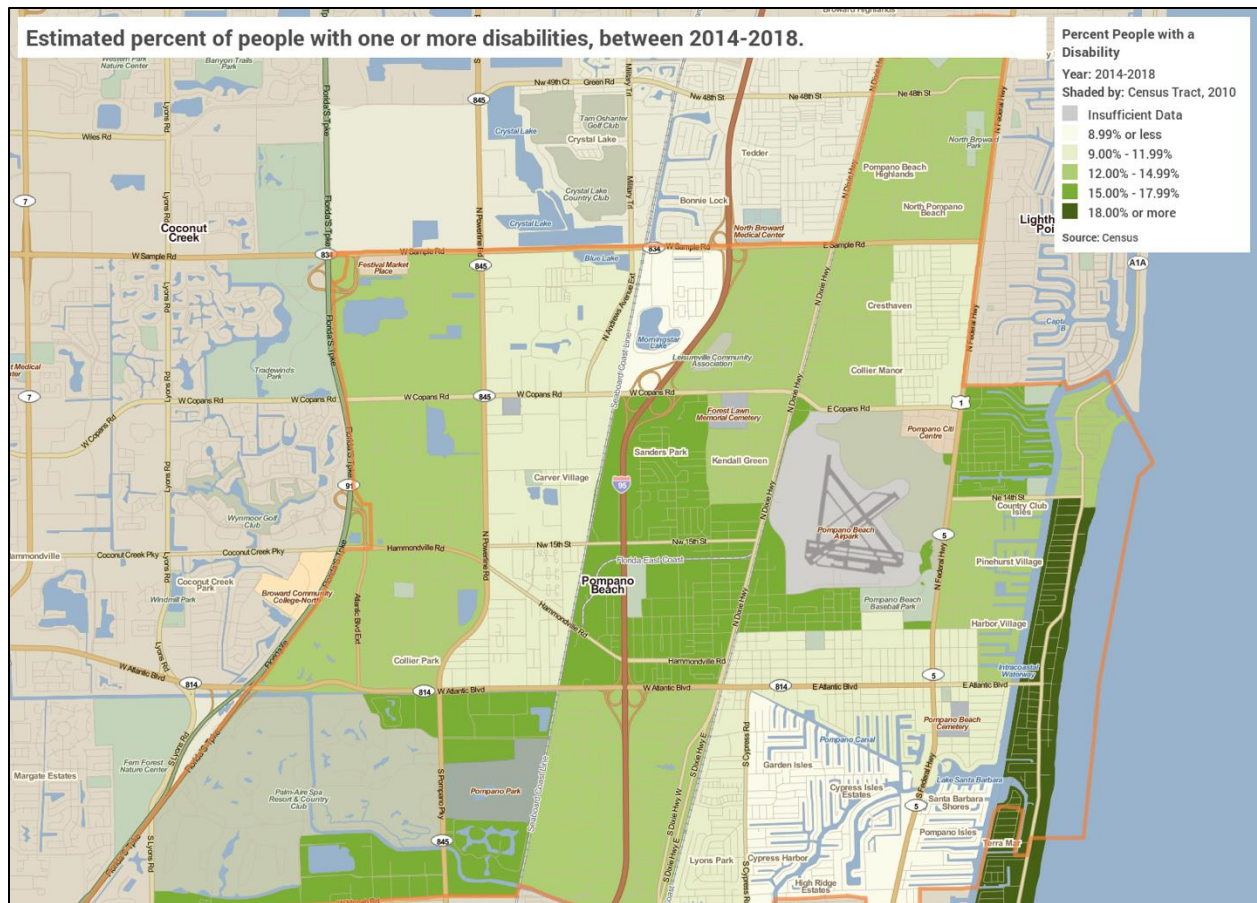


Figure 8. Share of persons with a disability, City of Pompano Beach.

Source: 2014-18 5-year ACS via PolicyMap.

Foreign Born

National origin is a protected class under the Fair Housing Act. This section reviews data on the absolute number of native and foreign-born persons in Pompano Beach and their share of the total population. People can discriminate against foreign born persons both intentionally and inadvertently.

The City of Pompano Beach has a substantial foreign-born population. Over 28% of the City's residents were born outside of the United States. The most common place of birth is Latin America where nearly 80% of the foreign-born population originate.

	Estimate	Percent
Foreign Born Population	30,724	(x)
- Naturalized U.S. citizen	13,279	43.2%
- Not a U.S. citizen	17,445	56.8%
Place of Birth		
- Europe	2,915	9.5%
- Asia	1,488	4.8%
- Africa	392	1.3%

	Estimate	Percent
- Oceania	50	0.2%
- Latin America	24,236	78.9%
- Northern America	1,643	5.3%
Source: 2014-2018 ACS 5-Yr Estimates (DP02)		

Table 9. Count and share of foreign-born persons and place of birth, City of Pompano Beach.

Place of Birth for Foreign Born Residents

While place of birth is not a protected class, data on place of birth can inform concerns related to fair housing by revealing what language, skin color, and religious barriers may result in discrimination.

As noted above, Latin America is the most common place of birth for the City's foreign-born population. The most common country of origin is Haiti where nearly one-quarter (7,315 residents) of the foreign-born population was born. Mexico, Brazil, Jamaica, and Canada were each the birthplace of at least 5% of the foreign-born population.

Place of Birth (Country)	Estimate	Percent
Haiti	7,315	23.8%
Mexico	2,823	9.2%
Brazil	2,697	8.8%
Jamaica	1,697	5.5%
Canada	1,636	5.3%
Cuba	1,484	4.8%
Venezuela	1,157	3.8%
Colombia	857	2.8%
Trinidad and Tobago	429	1.4%
Dominican Republic	369	1.2%
India	282	0.9%
Vietnam	133	0.4%
Philippines	122	0.4%
China	77	0.3%
Israel	66	0.2%
Source: 2014-2018 ACS 5-Yr Estimates (B05006)		

Table 10. Count and share of persons by place of birth, City of Pompano Beach.

Looking at the geographic distribution of residents born in another country, there are several areas notable for their relatively small share of foreign-born residents. The central tract around Sanders Park, the western most tracts, and two tracts on the coastal waterway, for instance, all have fewer than 10% of their population born outside the U.S. That is less than one-third of the citywide average.

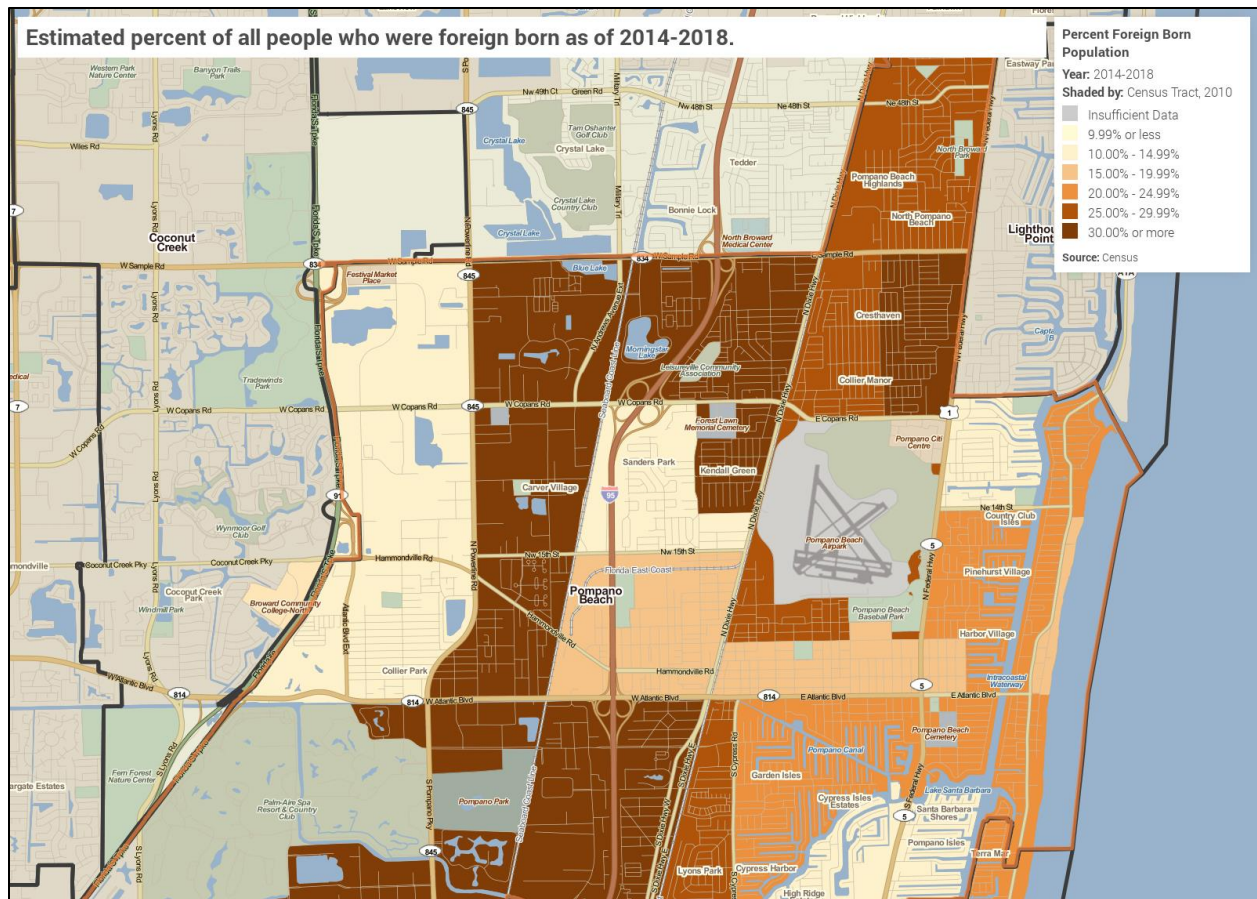


Figure 9. Foreign born population by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimates via PolicyMap.

Limited English Proficiency

While not a protected class under the Fair Housing Act, limited English proficiency (LEP) is recognized by HUD as a critical barrier to fair housing choice on the basis of national origin: that is, people in the foreign-born protected class are disproportionately likely to be LEP. HUD issued guidance on LEP on September 15th, 2016, stating: “Housing providers are ... prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination. The law also prohibits landlords from using limited English proficiency in a way that causes an unjustified discriminatory effect.”¹

Given the large foreign-born population in Pompano Beach, it is not surprising that a large portion of the population are limited English proficient. In total, approximately 10% of all households have LEP. Spanish and Other Indo-European languages are similarly common in Pompano Beach. Given the common country of origin for many foreign-born residents the other Indo-European language is likely French and/or Haitian Creole, the official languages of Haiti.

¹ Office of the General Counsel, HUD, 2016. “Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency.” HUD, Washington, DC.

	Total	Percent	Limited English-Speaking Household	Percent Limited English Speaking
All households	41,084	--	4,243	10.3%
- Spanish	7,206	17.5%	1,872	26.0%
- Other Indo-European	7,390	18.0%	2,188	29.6%
- Asian/Pacific Island	271	0.7%	116	42.8%
- Other languages	325	0.8%	67	20.6%

Source: 2014-2018 ACS 5-Yr Estimates (S1602)

Table 11. Count and share of population by Limited English Proficiency, City of Pompano Beach.

The geographic distribution of residents speaking limited English and Spanish is nearly identical to the distribution of areas with a concentration of foreign-born residents.

In cases where jurisdictions have a high concentration of limited English proficient residents, HUD offers guidance in its Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons. The Final Guidance advises jurisdictions with a high concentration of LEP residents to complete a LEP Four Factor Analysis and language access plan. This AI does not address the LEP Four Factor Analysis, but such analysis is a best practice for an entitlement jurisdiction like the City of Pompano Beach.

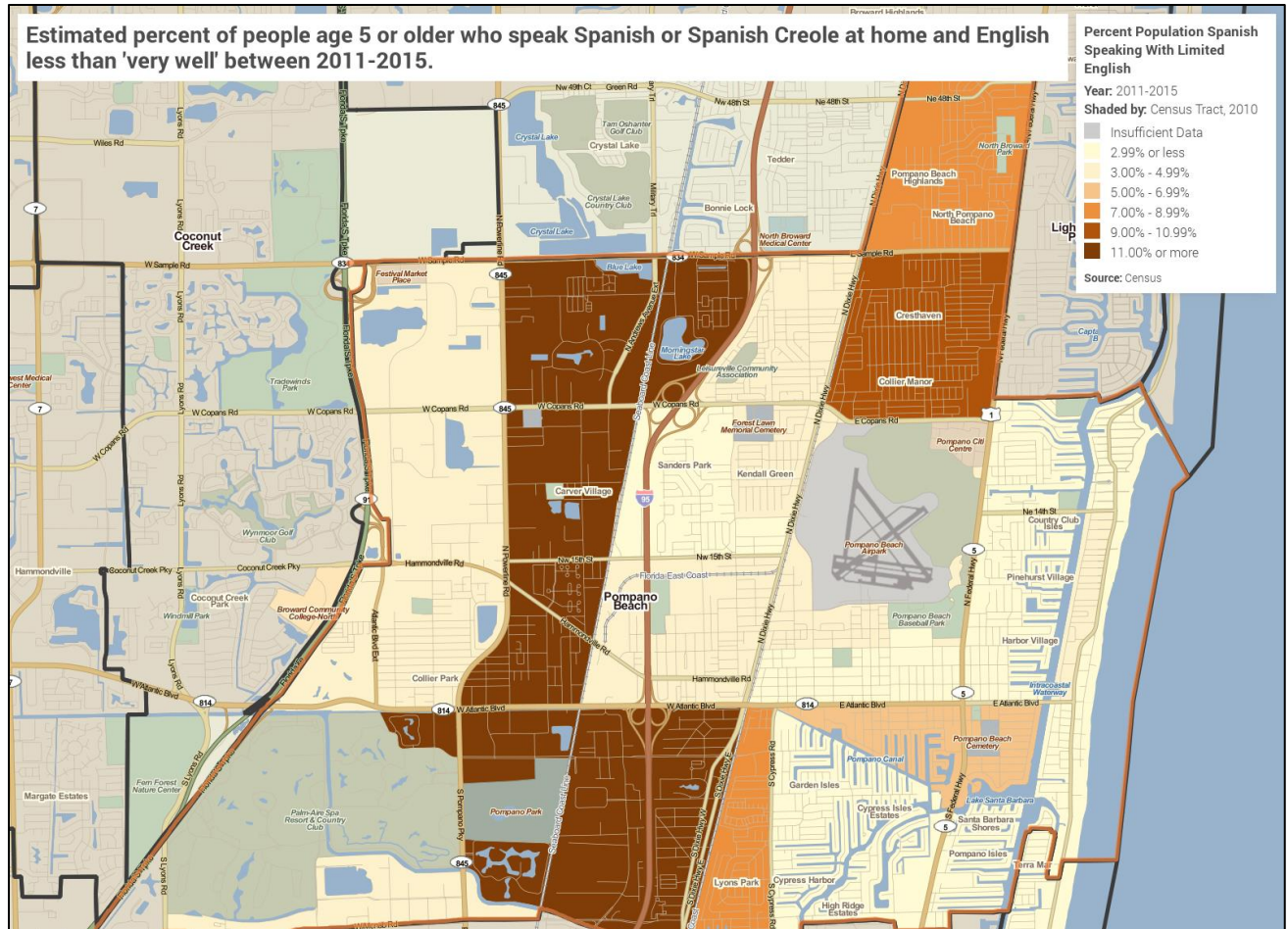


Figure 10. Share of Limited English Proficiency population by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS via PolicyMap.

Employment and Economic Data

The market for housing and the availability of affordable housing is tied to two forces: supply and demand. In theory, the market reaches an equilibrium where supply equals demand, but in practice it is much more complicated. Demand is not a static data point, it is the culmination of the needs, wants, and resources available to members of the population. An important factor in demand is the economic environment for households. Their income, employment opportunities, education, and availability of transportation all play a part in the demand for housing, both market-rate and affordable.

Household Income Distribution

In Pompano Beach, the median household income in 2018 was \$52,177. The most common income category for households is the \$25,000 to \$49,999, with nearly 25% of all households. The share of

households in an income group drops off by approximately 5% per \$25,000 of income until the \$100,000 or more income groups.

Income Category	Percent
Total	41,116
Less than \$24,999	23.6%
\$25,000 to \$49,999	24.9%
\$50,000 to \$74,999	19.1%
\$75,000 to \$99,999	13.8%
\$100,000 to \$149,999	10.1%
\$150,000 or more	8.6%
Median income (dollars)	\$52,177
Mean income (dollars)	\$68,838
Source: 2014-2018 ACS 5-Yr Estimates (S1901)	

Table 12. Share of households by household income, City of Pompano Beach.

The coastal tracts of the City have a noticeably higher median household income (MHI) than elsewhere in the City. In these tracts, the MHI is over \$55,000, significantly more than the lowest MHI tract located in the center of town where the MHI is under \$25,000. This low-income tract is also one with a high concentration of Black/African American households as noted earlier.

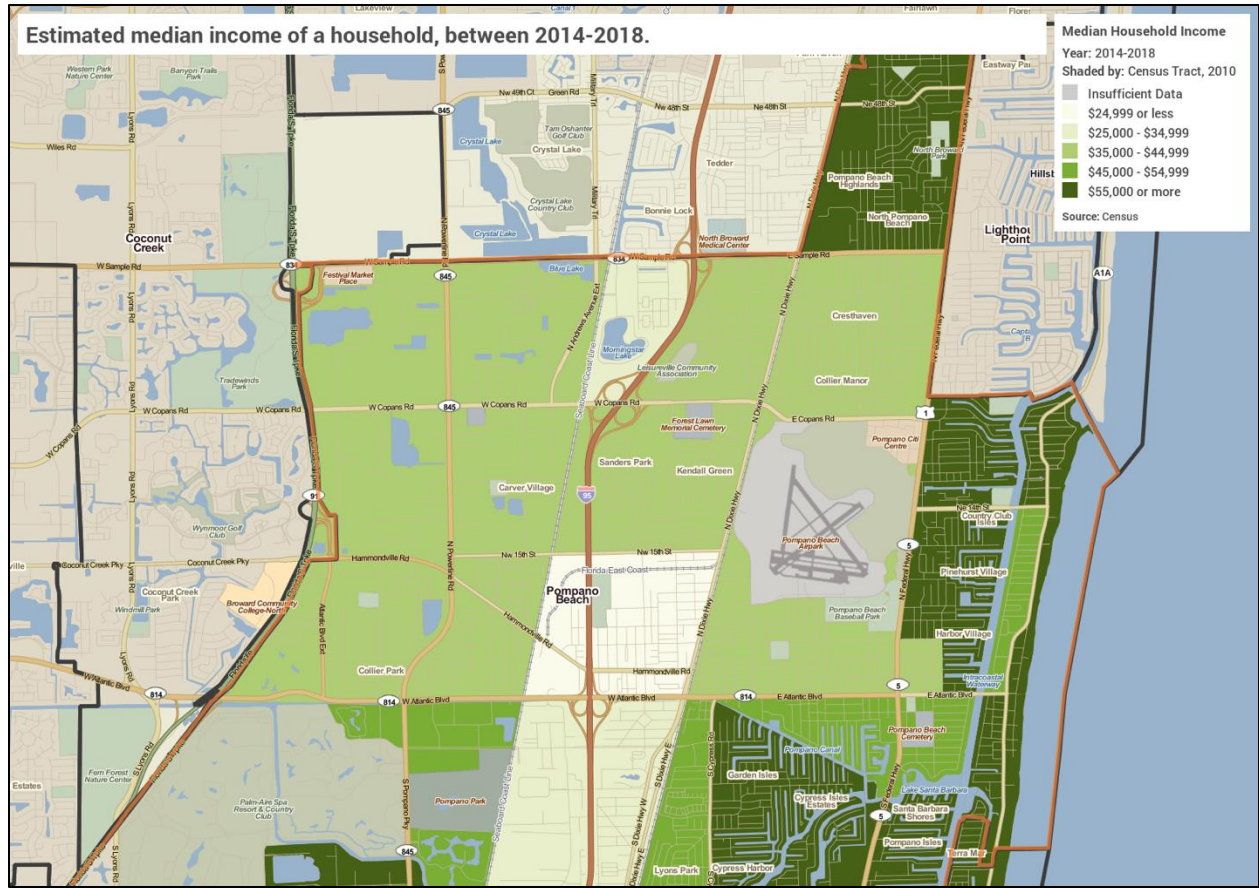


Figure 11. Median Household Income by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimated via PolicyMap.

Household Income by Race

In Pompano Beach, race or ethnicity is correlated with income. Black/African American households earn less than any other racial or ethnic group in City, more than \$10,000 less than the citywide median income. Understanding the relationship between race, ethnicity, and economic opportunities is important, particularly if race and ethnicity are correlated with location. When an area has a large minority population with a low MHI, it is possible the area meets HUD’s definition of a R/ECAP, which is the case for the Blanche Ely neighborhood. R/ECAPs and other majority-minority, high poverty areas are a top priority to address within the AI and may need to be a focus for grant fund use.

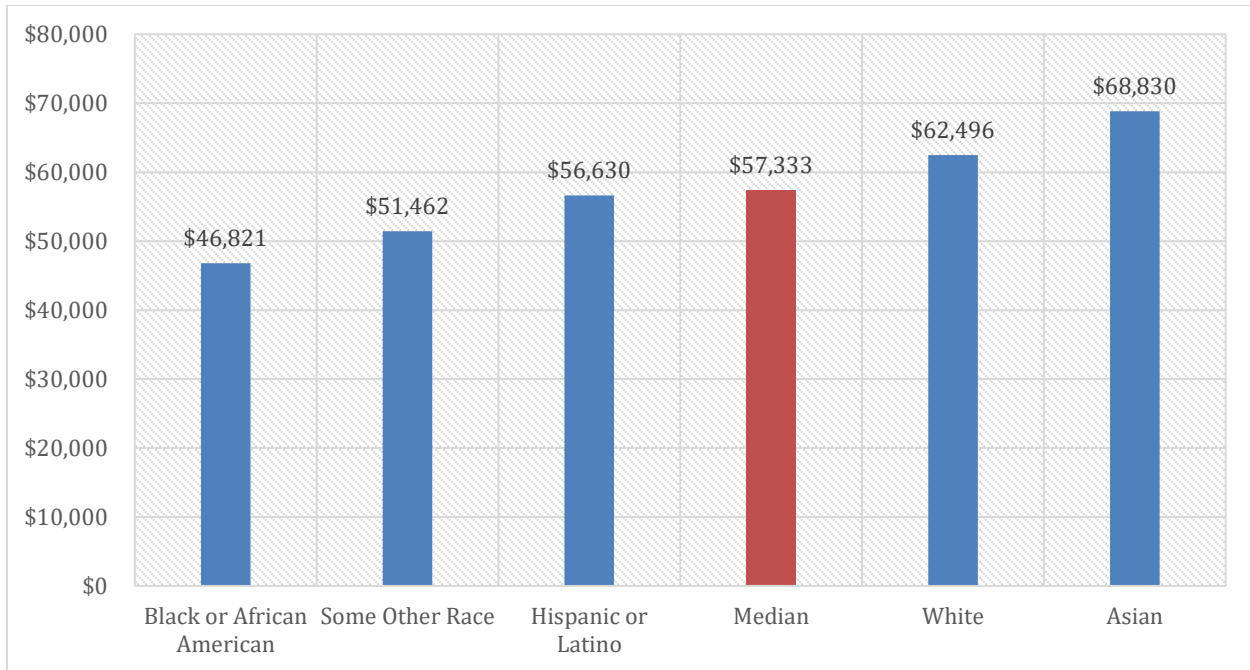


Figure 12. Median household income by race/ethnicity, City of Pompano Beach.

Source: 2014-18 5-year ACS, Table S1903.

Poverty

Poverty is, in general, considered to be a negative indicator of household economic mobility, housing security, and equal housing access. The poverty rate used by the Census, and used in this section of the AI, is based on a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. Income thresholds are regularly updated for inflation by the U.S. Census Bureau. Sources of income for the poverty threshold calculation include, but are not limited to: earnings, unemployment compensation, public assistance, interest and dividends, rental revenue, child support, educational assistance, and supplemental security income.

The table below shows the total and share of the population living below the poverty level in Pompano Beach, Broward County, and Florida. The poverty rate in Pompano Beach is higher than the rate for the County and Florida, with approximately one in 5 residents in the City living below the poverty level (20.2%).

	Pompano Beach	Broward County	Florida
Population below poverty level	21,118	255,214	2,983,851
Share of population below poverty level	20.2%	13.5%	14.8%

Table 13. Poverty status in the past 12 months, City of Pompano Beach, Broward County, and Florida.

Source: 2014-18 5-year ACS, Table S1701.

Low Poverty Index

The low poverty index measures the degree of poverty existing within a given neighborhood. It uses both family poverty rates and the percentage of households receiving public assistance to determine a score. Higher values on the index indicate a neighborhood where one can expect to be exposed to less poverty.

For the total population within both Pompano Beach and the region, White residents had the highest scores. Black/African American had the lowest scores in both geographic regions, scoring approximately 25 points less than White residents.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	42.14	58.20
Black, Non-Hispanic	15.06	31.69
Hispanic	28.02	41.96
Asian/Pacific Islander	37.93	57.70
Native American	29.47	41.60
Population Below Federal Poverty Line		
White, Non-Hispanic	35.16	46.48
Black, Non-Hispanic	15.55	20.33
Hispanic	21.11	29.14
Asian/Pacific Islander	38.76	46.87
Native American	9.00	27.07
Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017		

Table 14. Low Poverty Index values by race/ethnicity and poverty status, City of Pompano Beach and CBSA.

The low poverty index is lowest, indicating high poverty levels, in the inland tracts with a large non-White population. In most of the City's tracts the score is less than 30. The highest low poverty index score tract is on the coast.

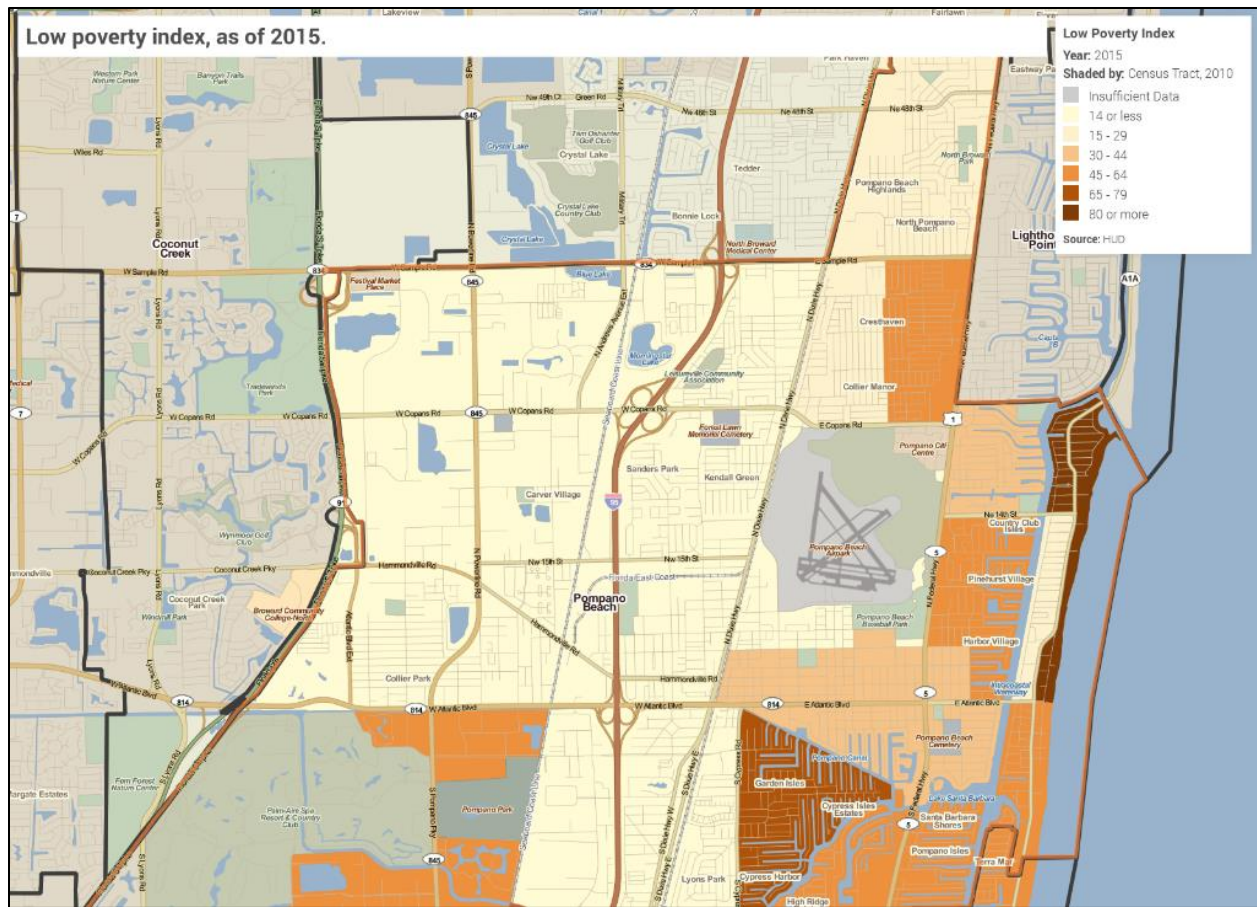


Figure 13. Low Poverty Index Values by census tract, City of Pompano Beach.

Source: HUD AFFHT0004 via PolicyMap.

Share of Workers by Industry

The industry that employs the largest number of workers in Pompano Beach is Professional, Scientific, Management, Admin, and Waste. This field employees nearly 16% of the city's workforce. Countywide, the educational services, health care, and social assistance is the most common field with 20.6%.

Industry	Number of Workers	Share of Workers (%)	Number of Workers	Share of Workers (%)
	Pompano Beach		Broward County	
Agriculture, forestry, fishing and hunting, mining	71	0.1%	2,349	0.2%
Construction	5,629	11.5%	64,784	6.8%
Manufacturing	2,794	5.7%	43,780	4.6%
Wholesale trade	1,718	3.5%	34,316	3.6%
Retail trade	6,070	12.4%	123,116	13.0%
Transportation and warehousing, and utilities	2,531	5.2%	57,859	6.1%
Information	753	1.5%	21,330	2.2%
Finance and insurance, real estate, rental, leasing	3,433	7.0%	75,350	7.9%

Professional, scientific, management, admin, waste	7,764	15.9%	134,133	14.1%
Educational services, health care, social assistance	7,545	15.4%	196,063	20.6%
Arts, entertainment, rec, accommodation, food serv.	6,571	13.4%	106,140	11.2%
Other services, except public administration	2,815	5.8%	53,014	5.6%
Public administration	1,190	2.4%	37,636	4.0%
Total	48,884		949,870	

Source: 2014-2018 ACS 5-Yr Estimates (DP03)

Table 15. Share of workers by industry, City of Pompano Beach.

As reflected in the figure below, a significant number of workers in the City live outside of Pompano Beach. This is not surprising given the relatively dense built environment in Broward County overall, with significant housing availability within a one-hour commute of the City.

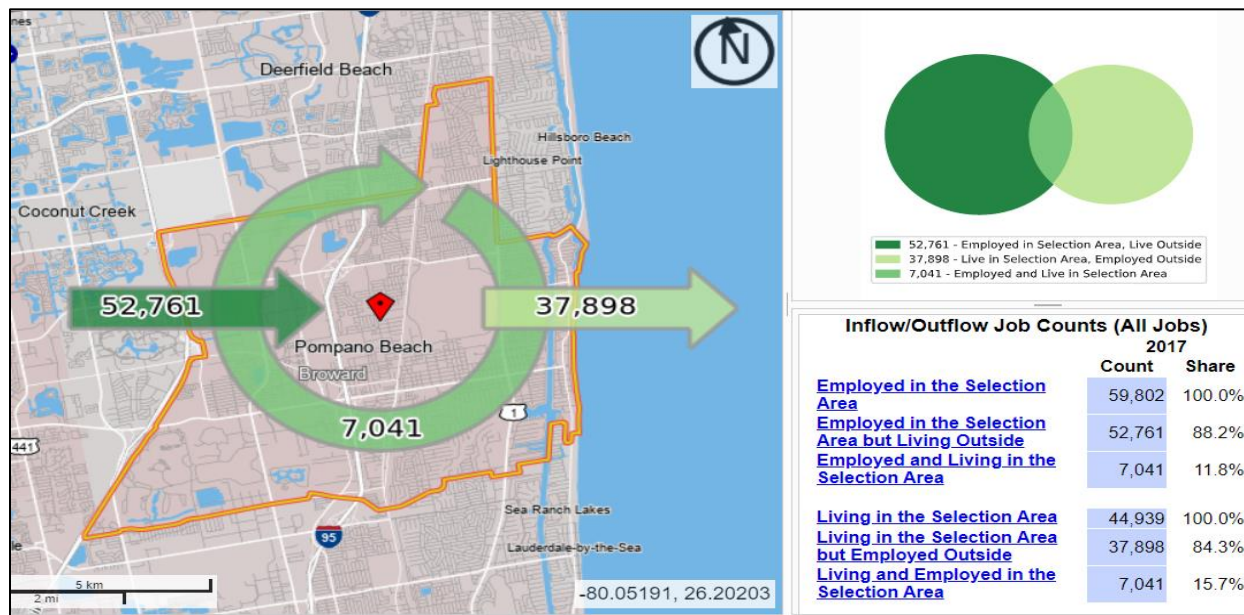


Figure 14. Inflow/Outflow of Jobs, City of Pompano Beach.

Source: OnTheMap, U.S. Census. Accessed: <https://onthemap.ces.census.gov/>.

Employment Status by Disability

In addition to overcoming fair housing barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at higher rates than the City's general population. The median earnings for someone with a disability in the city is approximately \$9,000 less than those without a disability. Residents with a disability also have higher poverty rates and are less likely to be employed or in the labor force.

	Pompano Beach		Broward County	
	With a Disability	Without a Disability	With a Disability	Without a Disability
Population Age 16 and Over	13,345	72,835	195,466	1,341,197
Employed	16.9%	64.0%	21.5%	67.7%
Not in Labor Force	79.7%	30.5%	74.8%	27.8%
Median Earnings	\$18,750	\$27,465	\$22,429	\$32,105
Below the Poverty Level	20.5%	16.7%	19.3%	11.2%

Source: 2014-2018 ACS 5-Yr Estimates (S1811)

Table 16. Employed population by Disability status, City of Pompano Beach and Broward County.

Unemployment

The unemployment rate is a key consideration for a community’s economic resilience and can drive housing insecurity and present barriers to fair housing access for certain protected classes facing systemic discrimination in employment. In Pompano Beach, Black/African American residents report a significantly higher unemployment rate than other racial and ethnic groups. This difference points to a relationship between race and employment in the City.

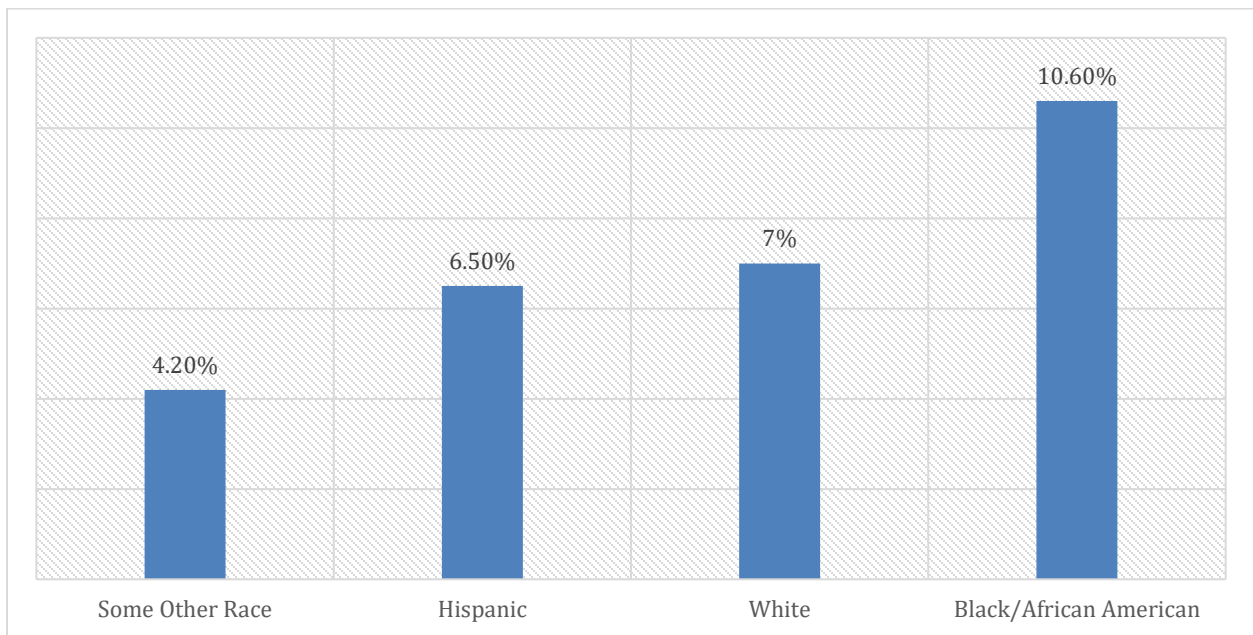


Figure 15. Unemployment by race/ethnicity, City of Pompano Beach.

Source: 2014-18 5-year ACS, Table S2301.

Since 2010 the unemployment rate in Pompano Beach has declined. The rate has steadily decreased for the population as a whole. However, as noted above, the unemployment rate is not consistent across all racial and ethnic groups.

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Pompano Beach	9.8%	9.2%	8%	6.8%	5.9%	5.9%	5.2%	4.6%	3.9%	3.5%
Broward County	10.2%	9.4%	8.0%	6.8%	5.9%	5.1%	4.5%	4.0%	3.4%	3.0%
Florida (state)	11.1%	10%	8.5%	7.2%	6.3%	5.5%	4.8%	4.2%	3.6%	3.1%
Source:	<i>Bureau of Labor Statistics, Local Area Unemployment Statistics (not seasonally adjusted)</i>									

Table 17. Unemployment rate, 2010 – 2019, City of Pompano Beach, Broward County, Florida.

In 2019, the unemployment rate continued to decline overall falling to a low of 2.9%. There was a slight increase during the summer months, but the change was temporary. In general, the unemployment rate has been steady between 3% and 4%.

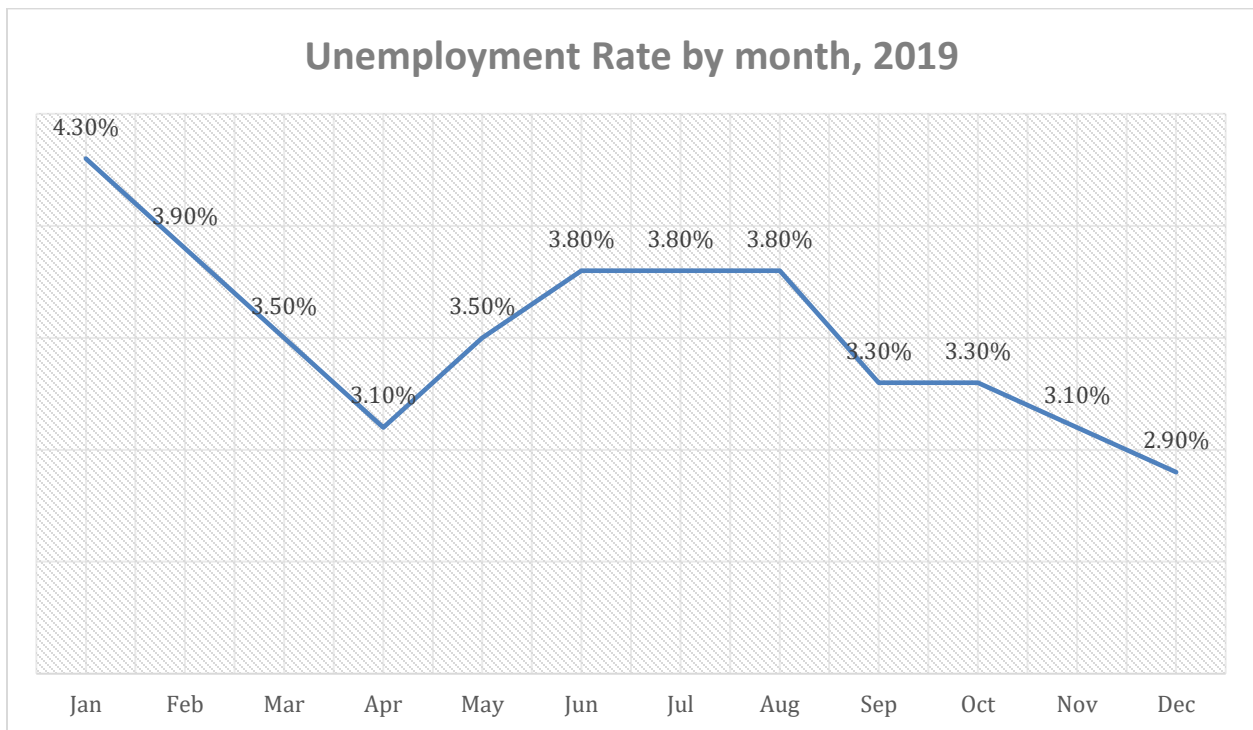


Figure 16. Unemployment rate in 2019, City of Pompano Beach.

Source: Bureau of Labor Statistics, Local Area Unemployment Statistics (not seasonally adjusted).

Tracts on the west side of the City have an unemployment rate considerably higher than elsewhere in the City. In these tracts, the rate is 18% or higher, a notable contrast to other tracts in the City, typically with unemployment rate under 12%.

The factors driving unemployment rate in a neighborhood are many, including: an individual's attributes, a mismatch between labor skills and job opportunities, a lack of educational attainment, macroeconomic headwinds for local industries, lack of access to affordable child care, presence of disabled or elderly relatives requiring 24-hour attention, and interest in seeking work. These factors drive unemployment

statistics, in part, because of the methodology for calculating the unemployment statistic. People are classified as unemployed if they:

- 1) Do not have a job;
- 2) Have actively looked for work in the prior four weeks; and
- 3) Are currently available for work.

Actively looking for work includes contacting an employer, submitting resumes, answering job advertisements, or some other means of active job search. The second and third criteria for unemployment status could be the reason for the high unemployment rates in the westernmost tracts of the City – residents in high poverty communities, for instance, might not be actively searching for work.

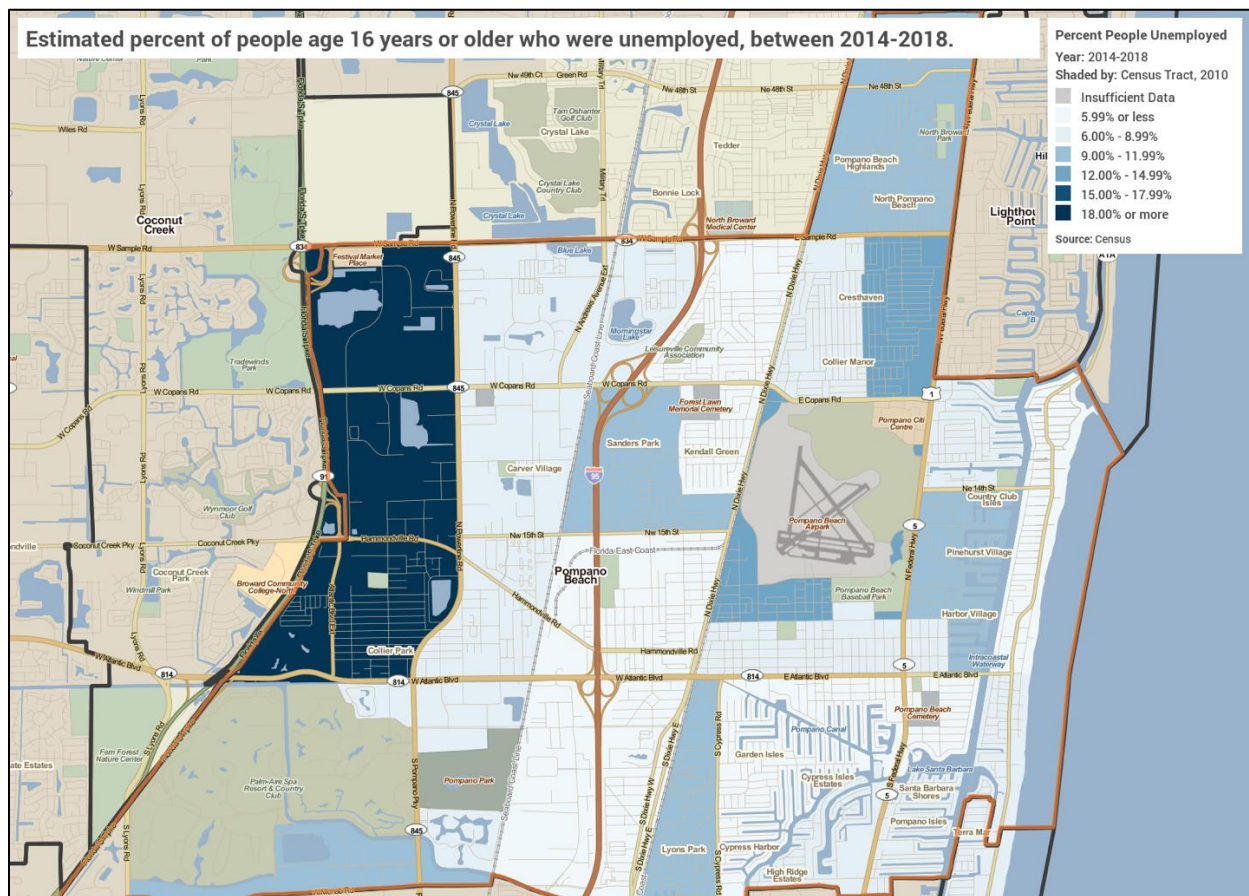


Figure 17. Unemployment rate by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimated via PolicyMap.

Potential Employment Impacts from COVID-19

At the time this report was written in June, 2020, infections from the novel coronavirus referred to as COVID-19 were increasing across the United States and in Florida, Broward County, and the City of Pompano Beach. Reacting to the virus, Florida Governor Ron DeSantis declared a Public Health Emergency

on March 1, 2020 and on April 1 issued Executive Order 20-91, ordering individuals to restrict their movements and personal interactions outside of their homes. Subsequent to the Governor's emergency declaration, Broward County issued a local state of emergency on March 10, 2020 and the City of Pompano Beach issued a local state of emergency on March 4, 2020. A side effect of these states of emergency were significant job losses across the country, state, Broward County, and the City of Pompano Beach.

In April, 2020, the U.S. Bureau of Labor Statistics (BLS) published an article estimating the labor market impacts of establishment shutdowns by focusing on industry sectors directly exposed to the shutdowns (Matthew Dey and Mark A. Loewenstein, "How many workers are employed in sectors directly affected by COVID-19 shutdowns, where do they work, and how much do they earn?," Monthly Labor Review, U.S. Bureau of Labor Statistics, April 2020, <https://doi.org/10.21916/mlr.2020.6>). The authors used BLS data from the Quarterly Census of Employment and Wages (QCEW) and the Occupational Employment Statistics (OES) programs to estimate the number of employees working in the following 'directly exposed' industries:

1. Restaurants & Bars
2. Travel & Transportation
3. Personal Services
4. Entertainment
5. Other sensitive retail
6. Sensitive Manufacturing

The authors estimated that in the Miami-Fort Lauderdale-Pompano Beach metropolitan statistical area (MSA), approximately 23.9% of those employed as of June 2019 in the six identified industries were at risk from COVID-19 shutdowns. The estimates generated through this exercise are only available at the MSA.

In the interest of exploring the degree to which residents of Pompano Beach may be at risk of job loss as a result of COVID-19, a crosswalk was developed between the North American Industry Classification System (NAICS) codes used in the BLS report and U.S. Census industry codes available at the census tract level via the ACS. This approach allows the use of Census data available at a detailed geographic level (tracts), to assess the degree to which workers in the City and its neighborhoods are vulnerable to economic impacts from the shutdown. Comparison of the NAICS to ACS codes was based on the '2017 Census Industry Code Lists' available here: <https://www.census.gov/topics/employment/industry-occupation/guidance/code-lists.html>.

When compared to the identification of sub-industry 'directly exposed' NAICS industry codes used in the BLS study, the crosswalk approach in this analysis likely overestimates the number of workers at risk of job loss but does offer valuable insight into worker vulnerability to job loss by neighborhood in the City.

The result of the crosswalk exercise is below:

BLS Study NAICS Codes	Identified Census Industry Categories
Restaurants and Bars – 7223, 7224, 7225	Accommodation & Food Services
Travel and Transportation – 4811, 4812, 4853, 4854, 4859, 4881, 4883, 7211	Transportation & Warehousing
Personal Services – 6212, 8121, 8129	Healthcare & social assistance; Other services except public administration
Entertainment – 7111, 7112, 7115, 7131, 7132, 7139	Arts, Entertainment, Recreation
Other sensitive retail – 4411, 4412, 4421, 4422, 4481, 4482, 4483, 4511, 4512, 4522, 4531, 4532, 4539, 5322, 5323, 4243, 4413, 4543	Retail trade
Sensitive manufacturing – 3352, 3361, 3362, 3363, 3364, 3366, 3371, 3372, 3379, 3399, 4231, 4232, 4239, 3132, 3141, 3149, 3152	Manufacturing

Table 18. NAICS and Census industry class code crosswalk

Source: FHC analysis of Dey and Loewenstein 2020, NAICS detailed classification codes and Census industry classifications available here: <https://www.census.gov/topics/employment/industry-occupation/guidance/code-lists.html>

Using the crosswalk and tract-level data on industry employment for the City of Pompano Beach, the table below was developed to estimate the number of workers at risk of job loss as a result of the COVID-19 shutdown. The total count of employed persons by at-risk industry represented in the table below differs from total share of workers by industry presented earlier in this report (see Share of Workers by Industry) because the former is the sum of workers by all census tracts in the City and the latter is the total estimate for the City of Pompano Beach. Individual census tract figures have a greater margin of error in the estimate than the margin of error for the city overall.

Manufacturing	Retail Trade	Transpo. & Warehousing	Healthcare & social assistance	Accommodation & Food services	Other Services	Arts, Entertainment, Recreation
2,989	6,269	2,676	5,411	5,345	3,028	1,557
TOTAL	27,275 (52.4% of civilian employed population over the age of 16)					

Table 19. Count of employed persons by at-risk industry, City of Pompano Beach.

Source: FHC analysis of 2014-2018 5-yr ACS, Table S2403

The table below shows the total number and share of at-risk workers by census tract. The total number of at-risk employees by census tract mirrors the relatively even distribution of workers across the City. Coastal tracts have fewer at-risk workers, while tracts further inland have larger numbers of at-risk workers.

Tract ID	Total Employed	Total At Risk	Pct At Risk
502.06	1,564	899	57.48%
309.04	2,518	1,290	51.23%
302.01	2,260	1,388	61.42%
302.03	2,038	1,067	52.36%
302.02	710	371	52.25%
502.05	1,050	562	53.52%
308.02	3,099	1,646	53.11%
309.03	2,192	1,158	52.83%
311.02	1,390	658	47.34%
312.04	1,099	651	59.24%
312.05	668	296	44.31%
502.04	2,983	1,390	46.60%
310.01	1,290	736	57.05%
312.03	352	154	43.75%
311.01	1,137	532	46.79%
312.02	2,297	1,240	53.98%
309.02	1,555	866	55.69%
306	2,493	1,272	51.02%
310.02	2,367	1,266	53.49%
108	4,035	2,239	55.49%
303.01	1,763	853	48.38%
303.02	3,569	2,125	59.54%
304.01	1,565	975	62.30%
304.02	1,573	883	56.13%
305	2,957	1,446	48.90%
308.01	3,469	1,312	37.82%

Table 20. Number and share of workers at risk from COVID shutdown by census tract.

Source: FHC analysis of 2014-2018 5-yr ACS, Table S2403.

The analysis in the map below shows the share of workers in at-risk industries by census tract. The map is color-coded to show tracts with over 60%, over 50%, under 50%, and over 40% of workers in vulnerable industries. Areas with the most financially secure workers include coastal and eastern neighborhoods like Hillsboro Shores and Avalon Harbor, and heavy industrial areas like the Andrews Industrial District.

Tract share of workers in industries at risk from COVID-19

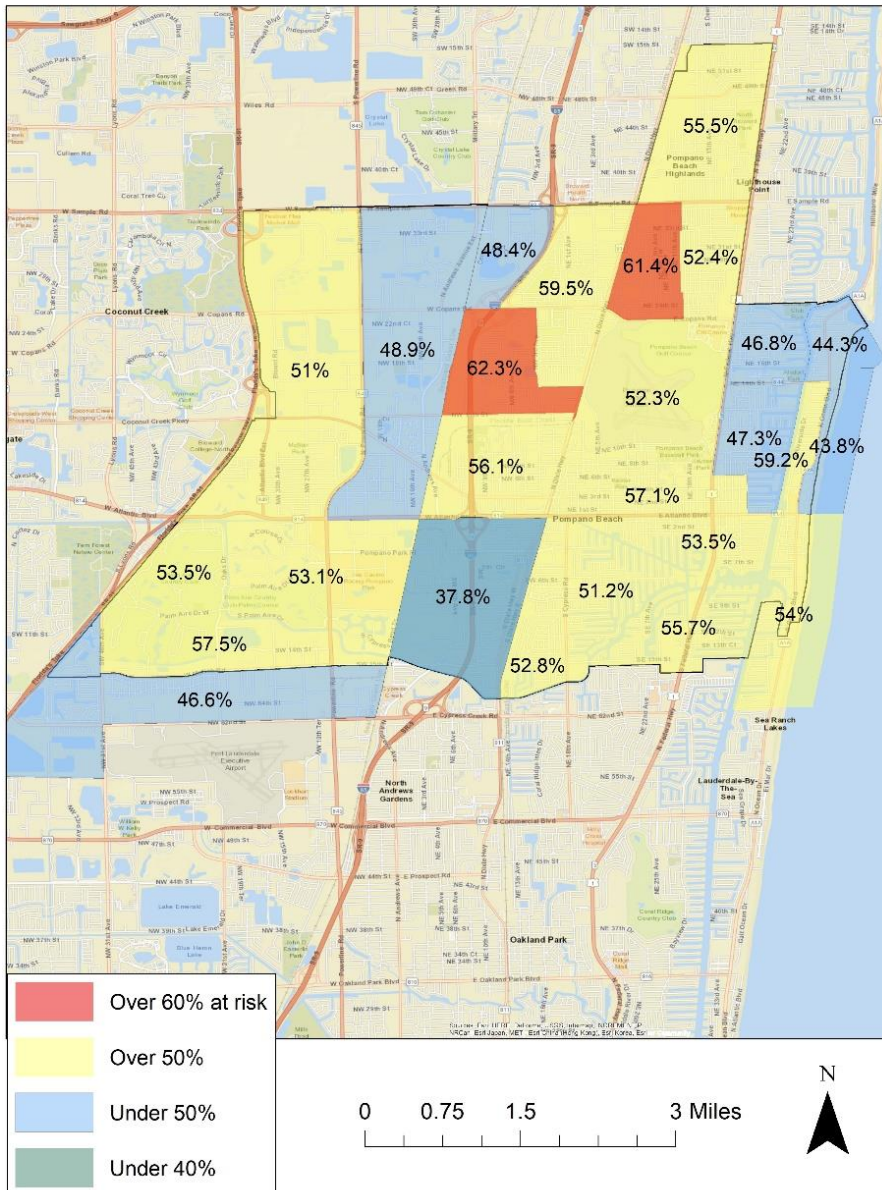


Figure 18. Tract share of workers in industries at risk from COVID-19.

Source: FHC analysis of 2014-2018 5-yr ACS, Table S2403.

Neighborhoods with a large share of vulnerable workers include Blanche Ely, Liberty Park, Old Pompano, Old Collier, and parts of Cresthaven. The table below shows the Black/African American and Hispanic share of population in census tracts with a large share of the population at risk of job disruption due to COVID-19 shutdowns. A majority of the most at-risk neighborhoods in the City are majority-minority in population.

Tract ID	% Black/African American	% Hispanic
304.01	92.1%	3.9%
304.02	84.9%	10.7%
108	31.4%	30.6%
302.01	29.3%	22.5%
502.06	27.0%	32.1%
310.01	11.6%	17.2%
312.04	0.5%	11.9%

Figure 19. Share of population by Black/African American and Hispanic workers, tracts with greatest share of at-risk workers.

Source: FHC analysis of 2014-2018 5-yr ACS, Tables B02001 and B03002.

Job Proximity Index

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA). Higher job proximity values represent better access to jobs. Index scores are consistently higher for residents in the City of Pompano Beach than the region as a whole. Most importantly, there is not a large difference in scores due to race and ethnicity. For the total population, all groups fall between 61.47 and 68.97 and non-White residents are not the lowest scoring.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	61.47	50.71
Black, Non-Hispanic	68.80	43.63
Hispanic	65.04	45.45
Asian/Pacific Islander	62.34	48.67
Native American	68.97	52.09
Population Below Federal Poverty Line		
White, Non-Hispanic	64.46	52.85
Black, Non-Hispanic	67.61	45.19
Hispanic	69.66	46.31
Asian/Pacific Islander	81.59	50.40
Native American	83.23	57.05

Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017

Table 21. Job Proximity Index values by race/ethnicity and poverty status, City of Pompano Beach.

On the map below, Jobs per Square Mile are indicated by color. Lighter blue indicates a lower number of jobs per square mile and darker blue indicates higher number of jobs per square mile. In addition, the map indicates the actual job count by census tract by displaying smaller circles where there are fewer jobs and larger circles where there are a higher number of jobs.

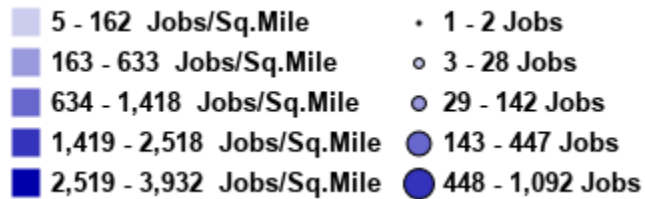
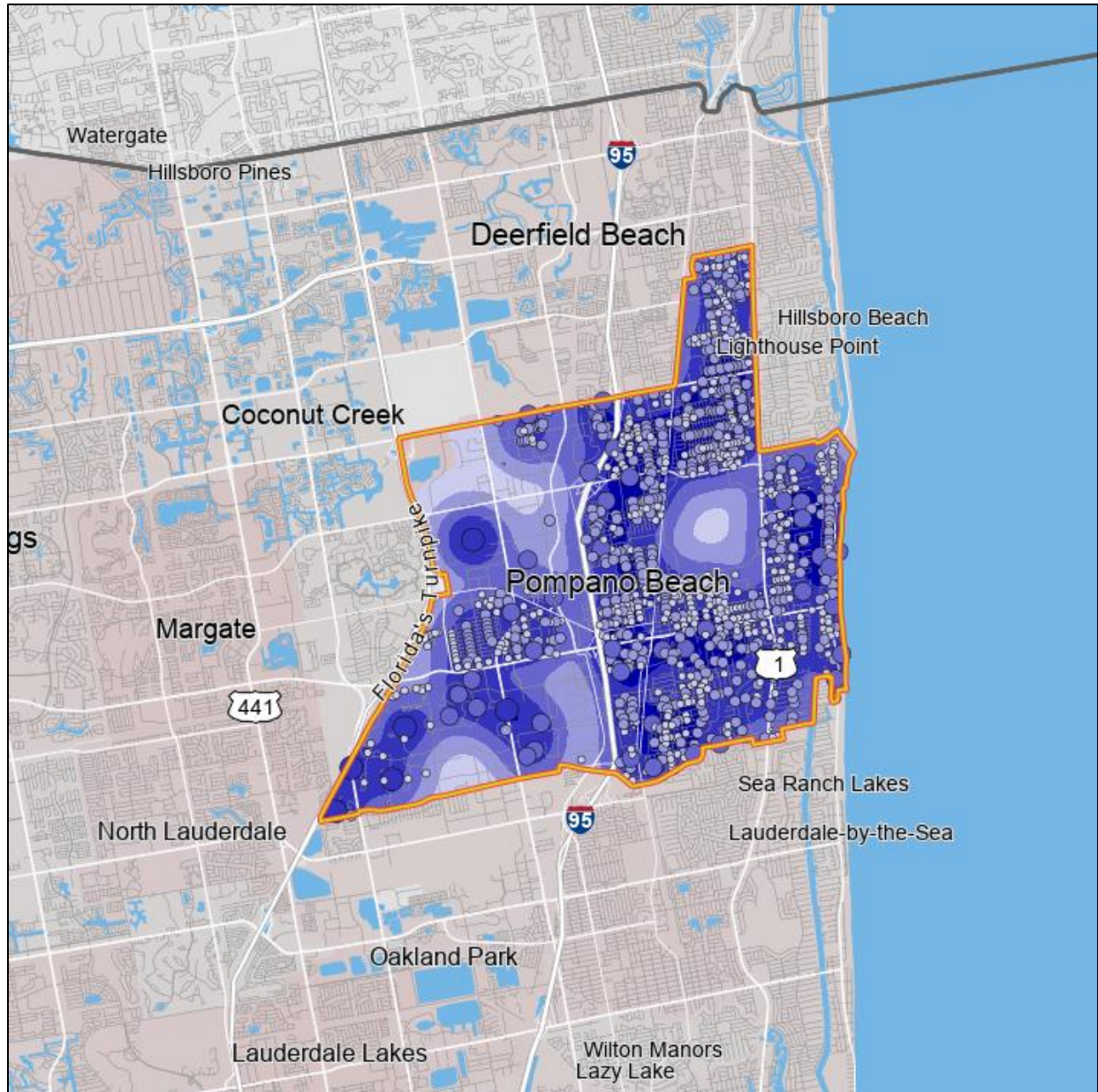


Figure 20. Concentration of jobs, City of Pompano Beach.

Source: Florida Department of Economic Opportunity Labor Shed report, 2019.

Both the table and the map indicate that there are factors other than proximity to jobs that determine the economic divide between racial and ethnic groups in the City of Pompano Beach.

Labor Market Index

The labor market index measures disparities in access to job opportunity by combining multiple factors that could affect access such as a census tract's unemployment rate, labor-force participation rate, and percent of the population over the age of 25 with a bachelor's degree. A higher value indicates higher level of labor engagement.

Within both Pompano Beach and the region as a whole, Black, non-Hispanic residents stand out with a much lower labor market index score than other groups indicating fewer jobs are filled by Black/African American persons . The difference between Black/African American residents and the next lowest scoring group in the total population (Hispanic) is over 15 points. The regionwide index scores are higher than the jurisdictional scores but Black, non-Hispanic residents still report a much lower score.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	48.55	60.48
Black, Non-Hispanic	18.87	33.21
Hispanic	34.35	47.50
Asian/Pacific Islander	42.80	60.07
Native American	36.25	43.84
Population Below Federal Poverty Line		
White, Non-Hispanic	41.70	51.50
Black, Non-Hispanic	20.71	24.21
Hispanic	28.89	38.10
Asian/Pacific Islander	58.54	53.42
Native American	20.00	33.36
Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017		

Table 22. Labor Market Index values by race/ethnicity and poverty status, City of Pompano Beach.

Educational Attainment

Educational attainment is a principal factor in securing long-term employment and earning a livable wage. The degree to which a person is able to attain a high school diploma, bachelor's, or even graduate degree, depends on social, cultural, systemic, and economic factors, many of which are beyond the direct control of local government. That said, a primary means by which a family can grant access to a quality education is by renting or owning a home in a high-quality public-school district. Thus, there is a definite nexus between the housing market, including the availability and affordability of housing, educational attainment, and employment. A local government interested in advancing educational opportunity and economic self-sufficiency for all of its residents should consider tools or mechanisms it can deploy to increase the supply of affordable housing units in high quality school districts.

In Pompano Beach approximately 17.2% of the population 25 years and over do not have a high school diploma or equivalent. Nearly 24% of the population has at least a Bachelor’s degree. Education is closely tied to income and future earning potential. Residents with higher educational attainment tend to have a greater level of housing security and lower levels of poverty.

	Estimate	Percent
Population 25 years and over	79,994	(X)
Less than 9th grade	6,142	7.7%
9th to 12th grade, no diploma	7,605	9.5%
High school graduate (equivalency)	25,062	31.3%
Some college, no degree	15,368	19.2%
Associate's degree	6,525	8.2%
Bachelor's degree	12,433	15.5%
Graduate or professional degree	6,859	8.6%
High school graduate or higher	66,247	82.8%
Bachelor's degree or higher	19,292	24.1%

Source: 2014-2018 ACS 5-Yr Estimates (S1501)

Table 23. Educational attainment, City of Pompano Beach.

Of particular interest for this AI is the relationship between educational attainment and race/ethnicity in the City of Pompano Beach. The figure below shows a disparity in educational attainment by race/ethnicity, with Blacks/African Americans having the lowest degree of educational attainment for all selected races and ethnicities for both high school diploma and bachelor’s degree or higher. Hispanics have the second lowest educational attainment by race/ethnicity in the City, with just under 7% higher rate of bachelor’s degree attainment compared to Blacks/African Americans.

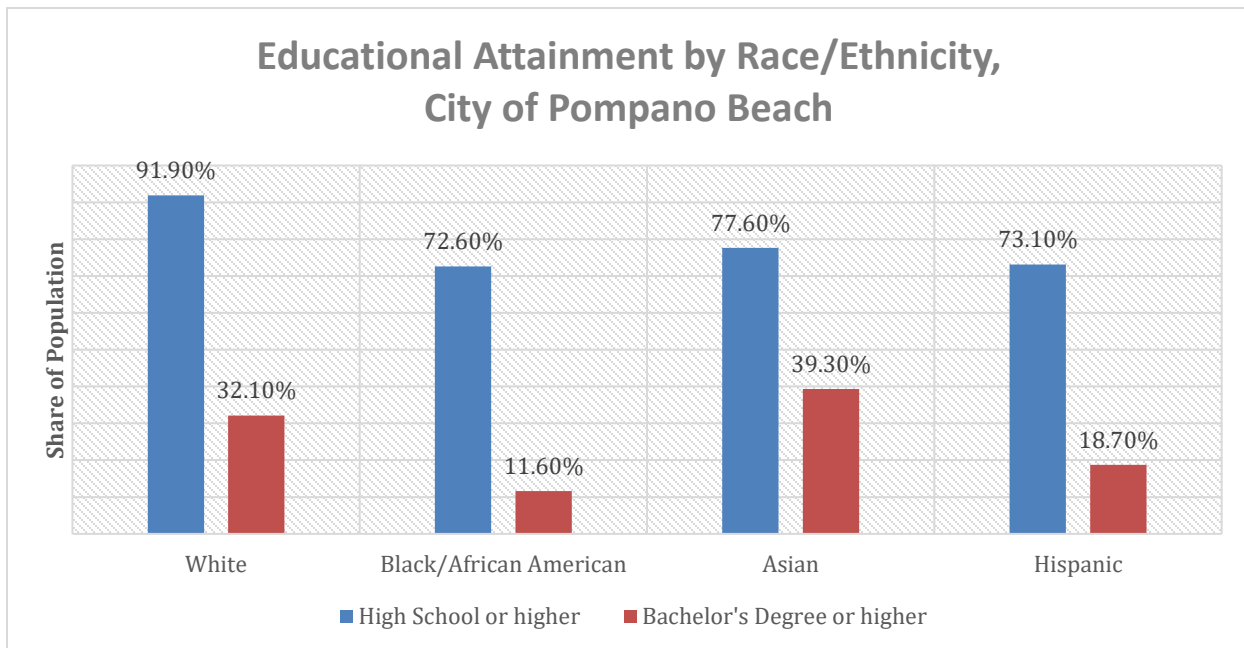


Figure 21. Educational Attainment by race/ethnicity, City of Pompano Beach.

Source: 2014-2018 5-yr ACS, Table S1501.

Residents of the City of Pompano Beach, regardless of their race/ethnicity, have generally attained less education compared to Broward County. Whites in the city have near parity with their counterparts in the County when it comes to high school education, but there is a -12.9% difference for Hispanics and -11.4% difference for Blacks/African Americans compared to the County.

	Broward County		Pompano Beach	
	High School	Bachelors	High School	Bachelors
White	93.7%	38.3%	91.9%	32.1%
Black/African American	84.0%	21.5%	72.6%	11.6%
Asian	87.9%	48.9%	77.6%	39.3%
Hispanic	86.0%	29.5%	73.1%	18.7%
Source:	2014-2018 5-yr ACS, Table S1501.			

School Proficiency Index

Recognizing the importance of quality education in accessing opportunities in the labor market, HUD developed a school proficiency index to gauge the degree to which neighborhood residents anywhere in the country have access to high quality schools. Specifically, the school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the school system in a neighborhood.

The school proficiency index in Pompano Beach is much lower than it is in the region as a whole. However, there is not a significant difference in index scores based on race or ethnicity in the City. Regionally, Black/African American residents have school proficiency index scores over 10 points below the second lowest group.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	19.76	61.07
Black, Non-Hispanic	13.28	34.72
Hispanic	17.48	59.07
Asian/Pacific Islander	17.75	62.73
Native American	17.66	46.15
Population Below Federal Poverty Line		
White, Non-Hispanic	18.47	54.07
Black, Non-Hispanic	14.97	28.70
Hispanic	14.65	49.63

Asian/Pacific Islander	10.65	59.24
Native American	4.00	36.06
Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017		

Table 24. School Proficiency Index values by race/ethnicity, City of Pompano Beach and CBSA.

As noted above, the school proficiency index in Pompano Beach is very low, ranking in the bottom 20% of all tracts in the country. With index values above 55 in portions of the eastern half of the City, including along the coast, some areas of the city do offer superior access to a quality education than areas to the West and away from the coast. It should be noted that the higher index values in these coastal and eastern tracts drive the difference between White (19.76) and Black/African American (13.28) index values in Pompano Beach.

A review of the most recent school performance grades for schools located within the City indicate that Charles Drew Elementary School and Robert C. Martin Elementary School are reported as Persistently Low-Performing schools (“C” grade or less for the past five years, and not more than a “B” grade within the past two years).

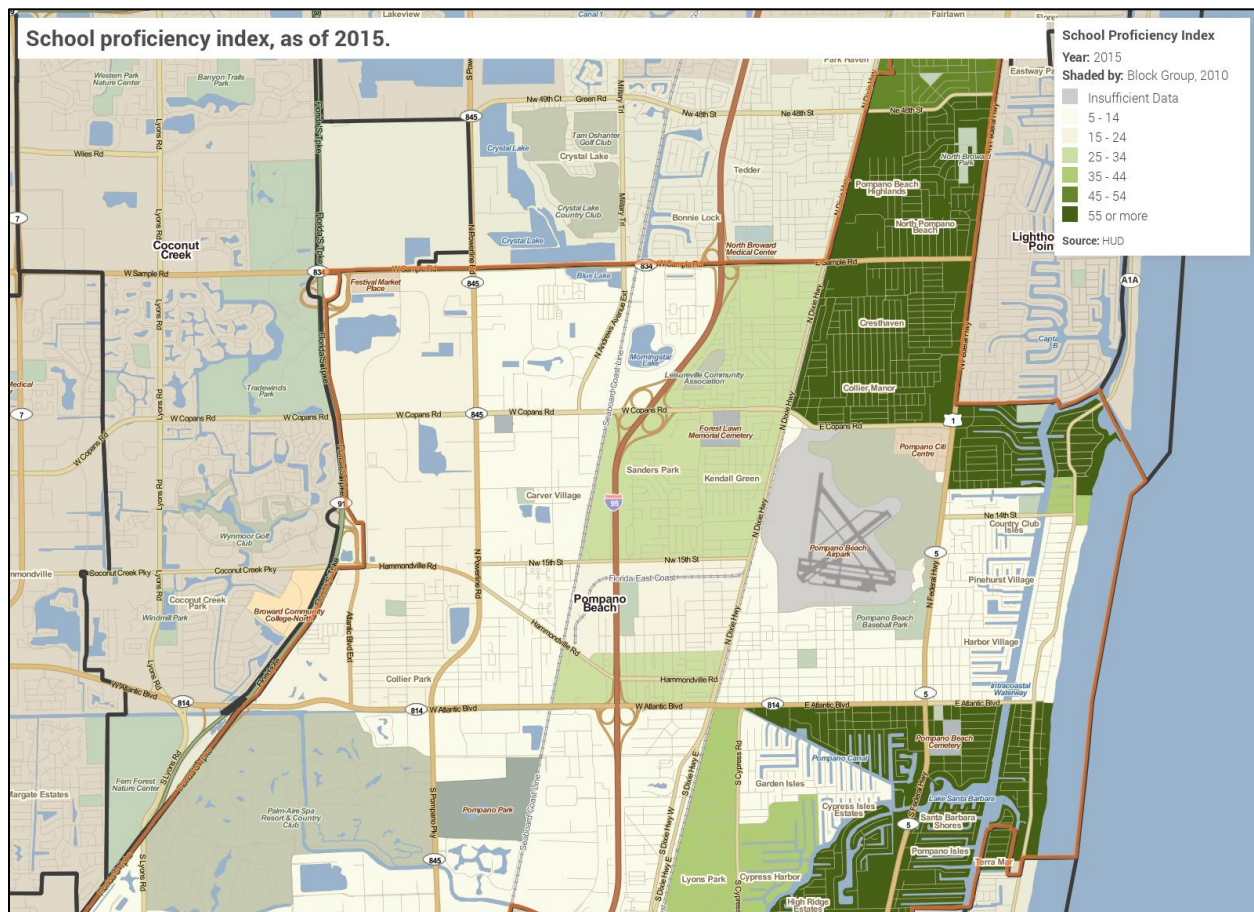


Figure 22. School Proficiency Index values by census tract, City of Pompano Beach.

Source: HUD AFFHT0004 via PolicyMap.

Transportation

Just as there is a relationship between housing location, employment, and access to quality education, there is also a relationship between housing location and transportation. Housing that is disconnected from public transportation naturally discourages public transportation use. After housing, transportation is the second-largest household expense, so in any conversation about housing affordability, it is helpful to examine the cost implications of transportation. As housing affordability becomes more problematic, many people are forced to move further and further away from where jobs are and “over-commute” by driving long distances to and from work. In many areas, high transportation costs often negate the relatively more-affordable housing prices. Further, as households seek affordable housing further from job centers, they must devote burdensome time in every working day to commuting from their home to their place of employment.

Transit Trips Index

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Specifically, the index is based on estimates of transit trips taken by a 3-person single-parent family with income at 50% of the median income for renters for the CBSA. The values are percentile ranked nationally, ranging from 0 to 100. The higher the value, the more likely residents in the neighborhood utilize public transit.

Across all races/ethnicities, Pompano Beach’s population is generally less reliant on public transit compared to residents living in the region (the region’s figures are higher than the City’s) with a few exceptions. White households in the City are more likely to use public transit compared to the region for both populations above and below the poverty line and Asians/Pacific Islanders above the poverty line in the City are more likely to use transit than those in the region.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	65.53	59.94
Black, Non-Hispanic	57.40	61.54
Hispanic	61.89	64.52
Asian/Pacific Islander	64.22	58.42
Native American	61.02	61.19
Population Below Federal Poverty Line		
White, Non-Hispanic	64.54	63.90
Black/African American, Non-Hispanic	56.30	63.29
Hispanic	62.34	68.13
Asian/Pacific Islander	61.09	62.21
Native American	55.00	63.44
Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017		

Table 25. Transit Trips Index values by race/ethnicity and poverty status, City of Pompano Beach.

Low Transportation Cost Index

The Low Transportation Cost Index measures the cost of transportation and proximity to public transportation. Specifically, the index is based on estimates of transportation costs for a 3-person family with income at 50% of the median income for renters for the region. Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in the neighborhood.

Compared to the region, residents living in the City enjoy lower transportation costs compared to the region, for those living above and below the poverty line across all races/ethnicities (with the exception of Blacks/African Americans under the poverty line). Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

	Pompano Beach	Region
Total Population		
White, Non-Hispanic	71.57	61.25
Black, Non-Hispanic	68.80	66.56
Hispanic	71.33	68.36
Asian/Pacific Islander	70.89	61.48
Native American	70.23	65.19
Population Below Federal Poverty Line		
White, Non-Hispanic	72.34	66.69
Black/African American, Non-Hispanic	68.35	69.57
Hispanic	74.21	72.91
Asian/Pacific Islander	76.41	65.96
Native American	73.00	70.47
Source: HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity, November 2017		

Table 26. Low Transportation Cost Index values by race/ethnicity and poverty status, City of Pompano Beach.

Commuting Characteristics

In Pompano Beach, commuting via personal vehicle is the most common form of transportation, by far. Nearly 85% of the city's residents' commutes via personal vehicle, slightly less than the 89% of countywide commuters. In the City, carpooling, public transportation, walking, and other means of commuting are all more common than in Broward County as a whole.

	Pompano Beach	Broward County
Total Workers (16 Years and Older)	47,927	931,338
Car, truck, or van	84.9%	88.9%
Drove alone	72.6%	79.9%
Carpooled	12.3%	8.9%
Public transportation (excluding taxicab)	3.9%	2.6%
Walked	2.5%	1.2%
Bicycle	0.6%	0.6%
Taxicab, motorcycle, or other means	3.9%	1.6%

	Pompano Beach	Broward County
Worked at home	4.3%	5.0%
Source: 2014-2018 ACS 5-Yr Estimates (S0801)		

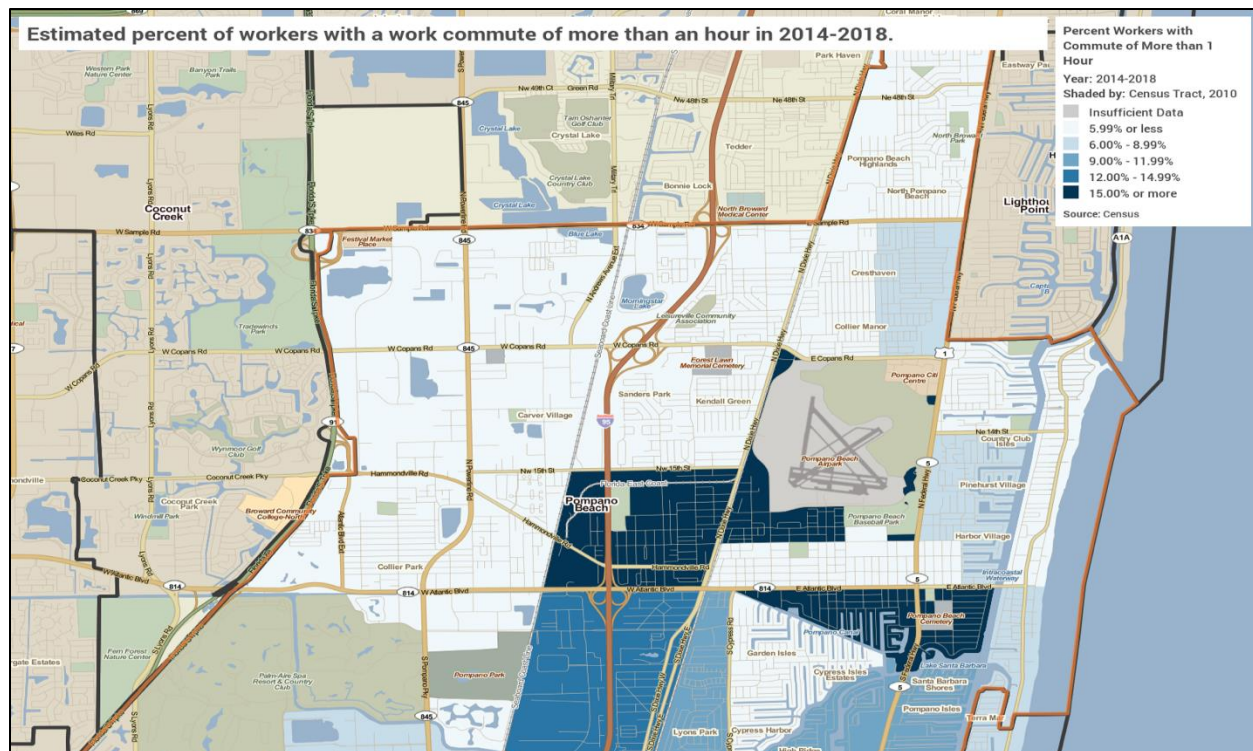
Table 27. Commuting method in City of Pompano Beach and Broward County.

In Pompano Beach, the commute travel times have increased by 1.4 minutes on average between 2010 and 2018. The largest growth occurred with residents who commute more than an hour while every other group decreased.

	2010	2018	Difference	Change
Workers 16 Years and Older (did not work at home)	43,894	45,889		
Less than 10 minutes	9.6%	8.7%	-0.9%	-10.3%
10 to 29 minutes	53.7%	53.6%	-0.1%	-0.2%
30 to 59 minutes	31.6%	30.9%	-0.7%	-2.3%
60 or more minutes	5.1%	6.9%	5.1%	26.1%
Mean travel time to work (minutes)	24.4	25.8	1.4 minutes	5.4%
Source: 2006-2010, 2014-2018 ACS 5-Yr Estimates (S0801)				

Table 28. Worker travel time, 2010 and 2018, City of Pompano Beach.

There are several tracts where the percent of workers commuting an hour or more is noticeably larger. In these tracts 15% or more of the population has a commute of one hour or more.



Source: 2014-18 5-year ACS estimates via PolicyMap.

Figure 23. Share of workers with a commute of more than an hour by tract, City of Pompano Beach.

Housing Data

This section details the types and cost of housing in Pompano Beach. It starts by providing a general overview of the types of housing available, vacancy rates, and the number of owners vs. renters. It then moves to housing affordability, examining rates of owner and renter cost burden and by race/ethnicity. The analysis also reviews housing quality, as measured by housing needs, housing problems, overcrowded conditions, and the age of housing. Finally, this section discusses publicly supported housing as well as the dynamic between housing and transportation.

The City of Pompano Beach has actively pursued a data-driven approach to understanding its housing market. In 2017 it commissioned a report called, “Affordable Housing Study Summary Findings” produced by Lambert Advisory. The report evaluated housing data, including an inventory of rent and owner-occupied housing, affordability based on supply and demand, and offered strategies and policy recommendations for addressing the demonstrated shortage of affordable housing. The data included in this report was based principally on data available as of 2017. The data included in this section offers an updated view of the housing market in the City of Pompano Beach, with a specific view of data across FHA and local ordinance protected classes.

Before beginning, it is important to detail the direct connection between housing affordability and the ability for protected classes under the FHA to enjoy equal access to housing. Across the United States, and in Pompano Beach, persons of color are disproportionately housing cost burdened, meaning their housing costs more than 30% of their household’s income. This fact is based on a complex dynamic between multiple factors, including lower household incomes for persons of color compared to Whites and generalized housing market discrimination. Due to this fact, a community’s housing supply, and the efforts it takes to develop, incentivize, and otherwise promote affordable housing, can either support or hinder fair housing. Depending on local statistics, addressing housing affordability can be a primary means by which a jurisdiction can affirmatively further fair housing.

Occupancy by Tenure and Vacancy

According to the US Census Bureau, in 2018 there were a total of 54,163 housing units in the City of Pompano Beach. Approximately one-quarter of these units were reported vacant. The vacancy rate is three times higher for rental units than owner-occupied units. Of the 41,084 occupied housing units slightly more than half were owner-occupied (53.2%).

The U.S. Census Bureau’s definition of housing unit vacancy is important to consider when reviewing the data in this section. The Census states that:

A housing unit is vacant if no one is living in it at the time of the interview, unless its occupants are only temporarily absent. In addition, a vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere. New units not yet occupied are classified as vacant housing units if construction has reached a point where all exterior windows and doors are

installed and final usable floors are in place. Vacant units are excluded if they are exposed to the elements, that is, if the roof, walls, windows, or doors no longer protect the interior from the elements, or if there is positive evidence (such as a sign on the house or block) that the unit is to be demolished or is condemned (*U.S. Census Bureau, HVS Definitions and Explanations, Vacant Housing Units*).

It is important to note that this vacancy definition includes seasonal homes. In Florida, many homes are seasonally vacant but relatively well-maintained. While these seasonal homes may not be blighted or a public health danger, for the purposes of housing a community’s year-round residents the units are effectively removed from the available housing stock.

	Estimate	Percent
Total housing units	54,163	--
- Occupied housing units	41,084	75.9%
- Owner-occupied	21,847	53.2%
- Renter-occupied	19,237	46.8%
- Vacant housing units	13,079	24.1%
- Homeowner vacancy rate	2.2	--
- Rental vacancy rate	6.6	--

Source: 2014-2018 ACS 5-Yr Estimates (DP04)

Table 29. Tenure status and vacancy, City of Pompano Beach.

In terms of the geographic distribution of renter and homeowner households, renters are more common in the center of the City than near the coast. Coastal tracts are less than 30% renters while the inverse is true in the central tracts where less than 30% of the housing units were owner-occupied.

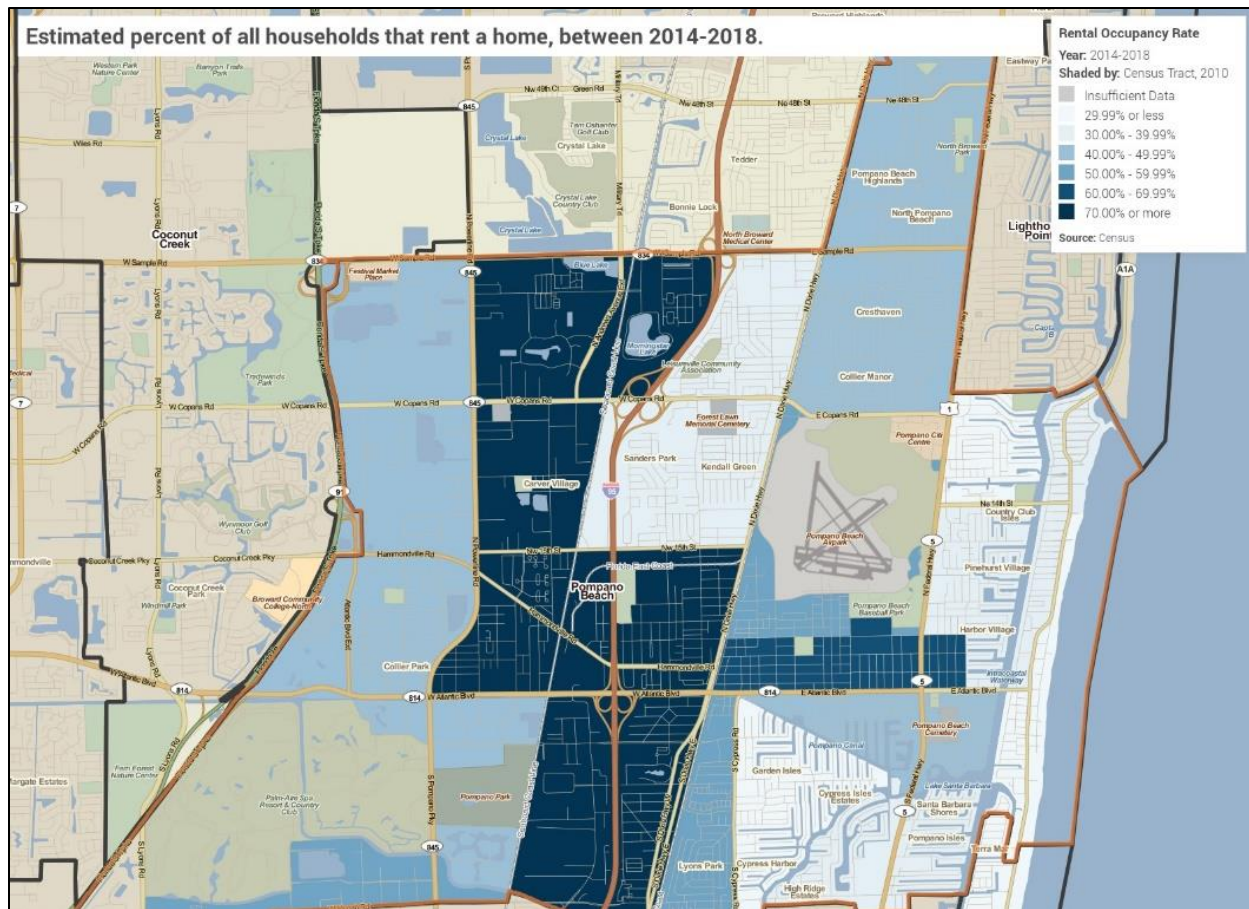


Figure 24. Share of renter households by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimates via PolicyMap.

Owner-occupied units by Race/Ethnicity

There is a significant disparity between the share of owner-occupied housing units held by White occupants and those held by minority occupants. In 2018, White, non-Hispanic persons in the City of Pompano Beach reside in 72.4% of owner-occupied housing units compared to 13.9% for Blacks/African Americans and 11.6% by Hispanics. This disproportionate share of owner-occupied households by Whites dropped by approximately 5% between 2010 and 2018 (77.4% in 2010 compared to 72.4% in 2018). In that same time period, the share of owner-occupied housing units occupied by Blacks/African Americans rose by 2.4% and by 2.3% for Hispanics.

	2010		2018	
	Owner-occupied housing units	Percent owner-occupied housing units	Owner-occupied housing units	Percent owner-occupied housing units
Total owner-occupied housing units	25,887	--	21,847	--

	2010		2018	
	Owner-occupied housing units	Percent owner-occupied housing units	Owner-occupied housing units	Percent owner-occupied housing units
Black/African American	2,977	11.5%	3,039	13.9%
American Indian and Alaska Native	52	0.2%	18	0.1%
Native Hawaiian and Other Pacific Islander	0	0.0%	0	0.0%
Asian	232	0.9%	228	1.0%
Some other race	232	0.9%	132	0.6%
Hispanic	24,618	95.0%	20,646	94.5%
White alone, not Hispanic	20,037	77.4%	15,809	72.4%
Two or more Races	181	0.7%	324	1.5%
Source:	2006 – 10 5-yr ACS, 2014 – 2018 5-yr ACS, Table S2502			

Table 30. Owner-occupied units by race/ethnicity, City of Pompano Beach.

Cost of Housing

Since 2010, the median home value has decreased in Pompano Beach by 12.7% and median rent rose by 20.8%. This indicates that charged rent is disconnected from actual property values. When inflation is factored in, the change is even more pronounced for owner occupied units. The median value of a home in 2010 is equal to \$251,313 in 2018 dollars, meaning that the purchasing power of the value of a median home has decreased by nearly 24% since 2010. Inflation for renters actually makes the change less pronounced. The median contract rent in 2010 would be approximately \$1,035 in 2018 dollars, with an inflation adjusted rent increase of 5.6%.

	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	\$219,700	\$191,900	-12.7%
Median Contract Rent	\$905	\$1,093	20.8%
Source:	2006-2010 ACS (Base Year), 2014-2018 ACS		

Table 31. Cost of housing, City of Pompano Beach.

With 44.5% of all rental units, the price cohort with the greatest number of units in Pompano Beach is \$1,000 to \$1,499. Approximately one quarter of all renters pay over \$1,500 per month and less than 3% pay less than \$500.

Rent Paid	Number	%
Less than \$500	477	2.6%
\$500-999	4,882	26.4%
\$1,000-1,499	8,226	44.5%
\$1,500-1,999	2,722	14.7%
\$2,000 or more	2,168	11.7%
Total	18,475	100%
Source: 2014-2018 ACS		

Table 32. Rent paid by number of units, City of Pompano Beach.

Median Home Value

The map below shows the median home value by census tract across the jurisdiction. Darker shaded census tracts are those with higher median home values, and lighter shaded tracts are those with lower median home values.

Higher home values are primarily along the coast. In these areas, the median home value is over \$350,000. Many of the high value tracts are also tracts that saw a significant population reduction since 2000. Lower home value tracts are inland, and some tracts have a median value of less than \$150,000. From a fair housing perspective, the cost of homes in these areas likely present a meaningful barrier to housing access for protected classes.

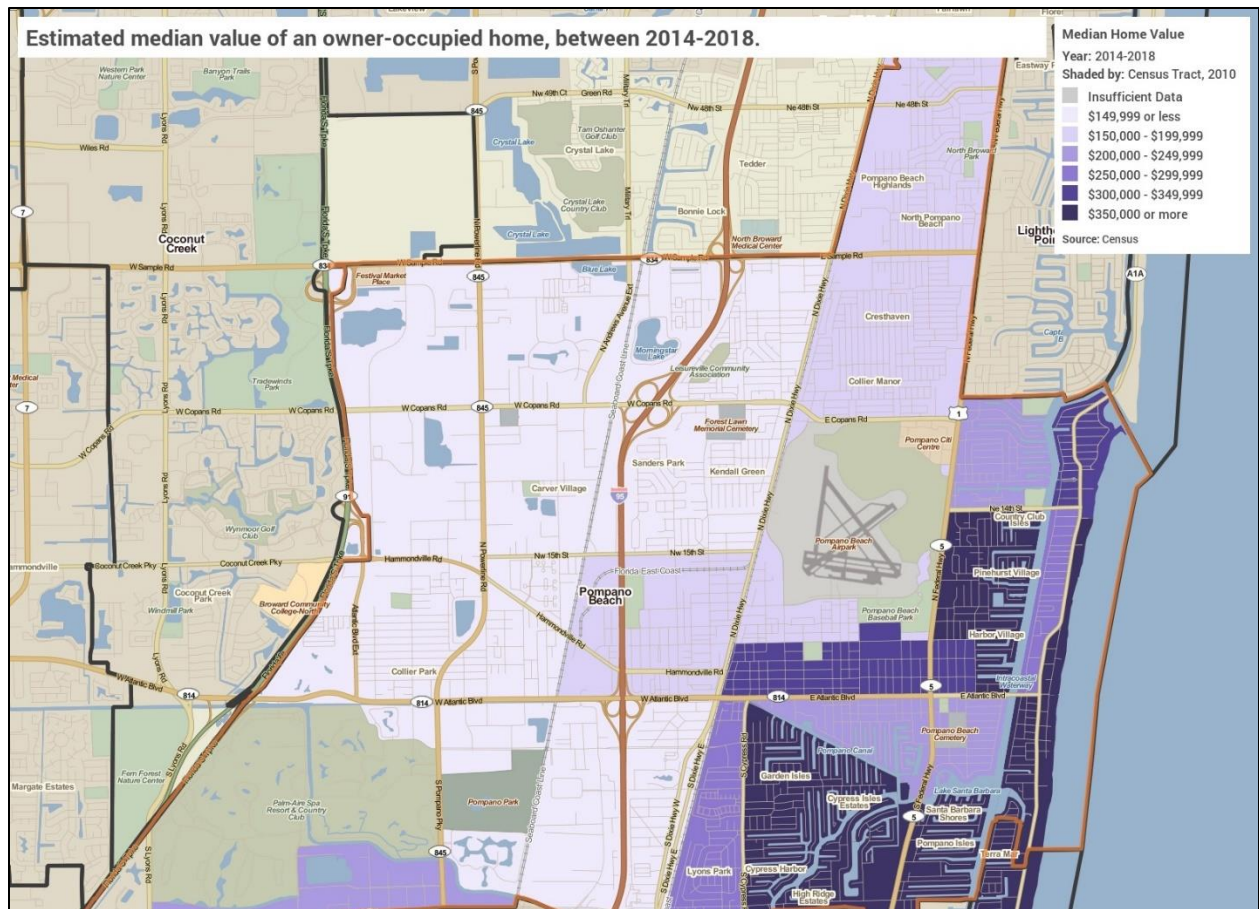


Figure 25. Estimated median value of an owner-occupied home.

Source: 2014-18 5-year ACS estimated via PolicyMap.

Median Rent

The map below displays the median rent by census tract. Rents are highest in the northeast of the City, where rental costs are estimated at over \$1,600 per month. Lower rent tracts report a median gross rent of less than \$1,100 and are centrally located in the City.

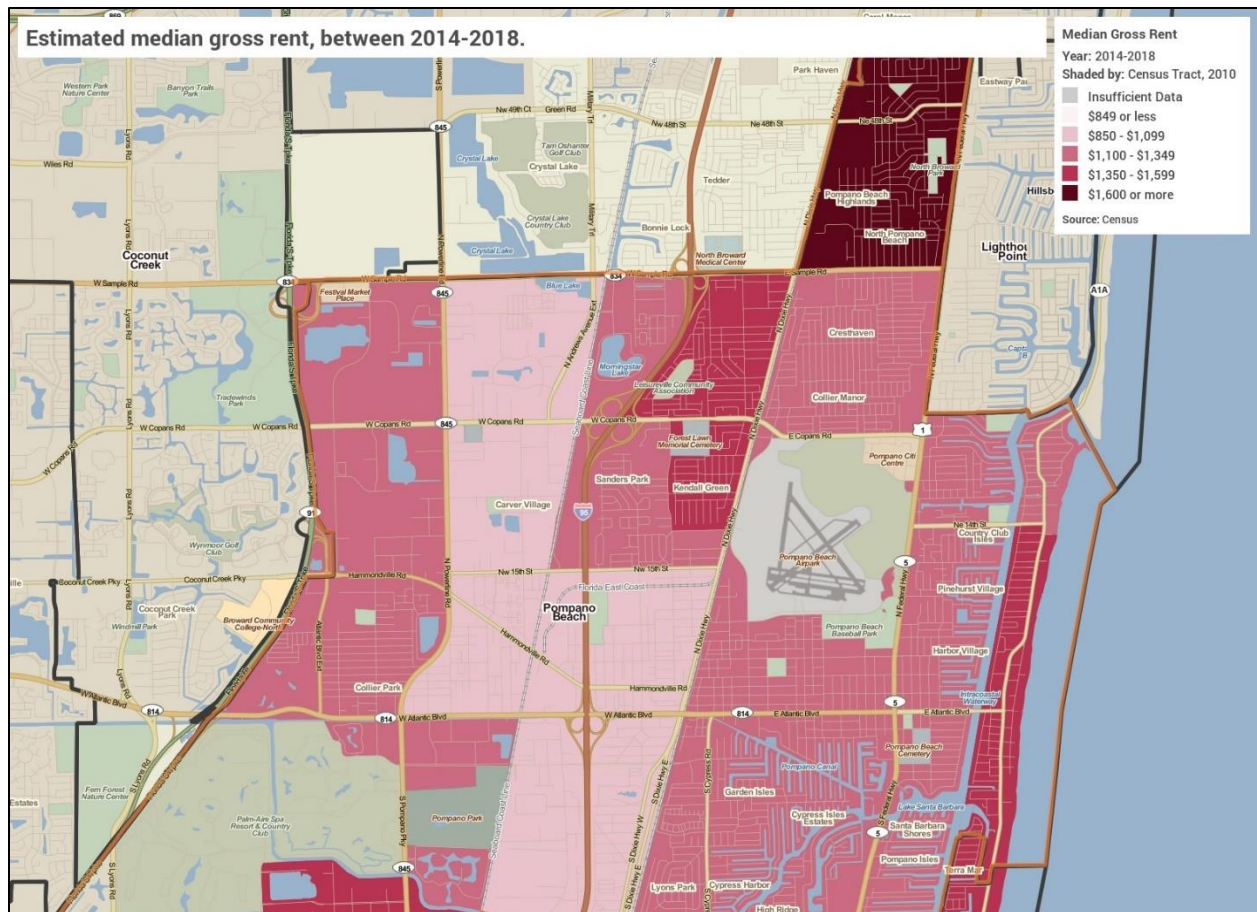


Figure 26. Estimated median gross rent, City of Pompano Beach.

Source: 2014-18 5-year ACS estimates via PolicyMap.

FMR and HOME Rents

The table below provides the HUD fair market rent (FMR) and HOME rent limits for 2019. Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.

The City of Pompano Beach is located in the Fort Lauderdale, FL HUD Metro FMR Area, and all information (FMR and HOME Rent Limits) presented here applies to all municipalities of the Fort Lauderdale, FL HUD Metro FMR Area.

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	950	1135	1444	2088	2536

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
High HOME Rent	939	1007	1211	1390	1531
Low HOME Rent	737	790	947	1095	1221
Source: 2019 HUD FMR and HOME Rent Limits					

Table 33. FMR and HOME rents.

Small Area Fair Market Rents (SAFMRs) are FMRs calculated for ZIP Codes within Metropolitan Areas. In metropolitan areas, HUD defines Small Areas using ZIP Codes within the metropolitan area. Using ZIP codes as the basis for FMRs provides tenants with greater ability to move into higher opportunity neighborhoods with jobs, public transportation, and good schools. The Fort Lauderdale – Pompano Beach – Deerfield Beach metropolitan area meets the criteria for the use requirement of SAFMRs.

The table below shows the SAFMRs by unit bedrooms in City of Pompano Beach zip codes.

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
33069	\$1,020	\$1,190	\$1,510	\$2,180	\$2,650
33060	\$910	\$1,070	\$1,350	\$1,950	\$2,370
33062	\$1,220	\$1,420	\$1,800	\$2,600	\$3,160
33064	\$990	\$1,150	\$1,460	\$2,110	\$2,560
Source:	HUD, FY 2020 Small Area FMRs for Broward County, FL, accessed July 2020: https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020_code/2020summary_sa.odn				

Table 34. Small Area FMRs by unit bedrooms, City of Pompano Beach

Housing Cost Burden by Race/Ethnicity

A review of Housing Assessment data provided by HUD provides information that can be analyzed and used to determine any racial or ethnic groups that may have a disproportionately higher housing need than other ethnic groups in the community. HUD has determined that a disproportionately higher need exists when the percentage of persons in a given category is at least 10% higher than the share of persons in the category as a whole.

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	21,515	8,569	9,655	979
White	14,250	4,845	5,180	720
Black / African American	3,530	2,215	2,795	175
Asian	280	70	105	0
American Indian, Alaska Native	10	4	0	0
Pacific Islander	0	20	0	0
Hispanic	3,070	1,350	1,385	80
Source: 2012-2016 CHAS				

Table 35. Greater Need: Housing Cost Burdens by AMI.

According to 2016 CHAS data, approximately 44.8% of all households in Pompano Beach spend 30% or more of their income on housing costs. These households are considered “cost burdened.” There are two racial or ethnic groups that are disproportionately cost burdened. Approximately 57.5% of Black/African American and 100% of Pacific Islander households are cost-burdened.

Households that spend 50% or more of their income are considered severely cost burdened and have higher levels of housing instability and likely need additional support. In Pompano Beach, 23.7% of all households are severely cost burdened. There are no groups disproportionately severely cost burdened.

Housing Affordability

Throughout the City there are limited affordable housing options for low income residents, particularly for owner-occupied housing. A very low-income household (30-50% AMI) has approximately 3,525 affordable owner-occupied units and approximately 2,170 rental units. With 15,000 households earning 50% HAMFI or less, these 5,700 units do not provide enough housing to meet demand.

% Units affordable to Households earning	Renter Units	Owner Units
30% HAMFI	630	No Data
50% HAMFI	2,170	3,525
80% HAMFI	11,395	8,430
100% HAMFI	No Data	11,435
Total	14,195	23,390
Source: 2011-2015 CHAS		
Data note: the most recent data is from the 2011-2015 CHAS.		

Table 36. Housing affordability by tenure status and income.

Housing + Transportation Affordability Index

The Housing and Transportation (H+T) Affordability Index considers the combined costs of transportation and housing to determine how burdened by these expenses’ households are. In Pompano Beach, housing and transportation account for 68% of the income for residents making 80% AMI. Housing is the largest expense, making up 43% of costs.

Index	Percent of Income	Estimated Households
H+T Index 80% AMI	68%	27,905
H+T Index 80% AMI (Housing Only)	43%	17,646
H+T Index 80% AMI (Transportation Only)	25%	10,259
Source: The Center for Neighborhood Technology (CNT), 2017 H+T Index		
Data Note: Number of total households according to H+T for calculating the estimate: 41,037		

Table 37. Housing + Transportation Affordability Index combined cost of housing and transportation.

Housing Needs & Problems

The table below gives an overview of housing problems in the City. Using 2016 CHAS data, it provides the numbers of households experiencing each category of housing problem by income ranges (up to 100% AMI) and tenure status. All housing problems are typically experienced at disproportionate rates by the lowest income households in a jurisdiction. Large numbers of households living in overcrowded or substandard housing generally indicate a severe mismatch between supply and demand of housing that is affordable in a community.

A review of the data shows that cost burden is clearly the most prevalent housing problem in the City across all income groups – a common trend in many communities across the state and nation. According to the 2016 CHAS data, there were 9,430 renters and 6,250 homeowners in the 0% to 100% AMI range spending more than 30% of their income on housing costs. It is also evident that renter households in the City experience housing problems at greater rates than do homeowners.

	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
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	210	65	40	15	330	20	20	4	0	44
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	50	95	50	10	205	4	50	70	10	134
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	290	280	250	55	875	40	35	185	125	385
Housing cost burden greater than 50% of income (and none of the above problems)	3,330	1,845	305	125	5,605	1650	825	475	160	3,110
Housing cost burden greater than 30% of income (and none of the above problems)	175	1,670	1775	205	3,825	655	805	1,105	575	3,140
Zero/negative Income (and none of the above problems)	300	0	0	0	300	545	0	0	0	545

	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
Source: 2012-2016 CHAS										

Table 38. Housing problems by number of households and income

The table below shows households with at least one severe housing problem broken aggregated by income and tenure status. The data show that the lower the income of a household, the greater the presence of a severe housing problem. A severe housing problem is:

- Severe Cost Burden – a household that pays 50% or more of its income to housing costs
- Lack of Complete Plumbing Facilities – missing hot and cold running water, a flush toilet, and/or a bathtub or shower
- Lack of Complete Kitchen Facilities – missing hot and cold running water, a sink with a faucet, a stove or range, and/or a refrigerator
- Overcrowding – 1.5 or more people per room

Over 93% of renters and nearly 83% of homeowners in the 0-30% AMI group have at least one severe housing problem. For residents earning between 80% and 100% AMI, only 25.6% of renters and 31.2% of homeowners have a severe housing problem.

	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
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,055	3,950	2,420	410	10,835	2,365	1,735	1,840	870	6,810
Having none of four housing problems	290	405	1,600	1,195	3,490	480	1,150	2,390	1,915	5,935
Household has negative income, but none of the other housing problems	300	0	0	0	300	545	0	0	0	545
Source: 2012-2016 CHAS										

Table 39. Aggregate severe housing problems by number of households and tenure status.

Cost Burden by Tenure Status

The table below shows cost burdened households by the family composition and tenure status. A cost burdened household is one in which 30% or more of their income goes to housing costs. Overall, renters are more likely than homeowners to have a housing cost burden. According to the 2012-2016 CHAS Data,

there are 13,015 renters and 10,505 owners in the 0%-80% AMI income range. Approximately 75% of renters and 50% of homeowners in this income range report being cost burdened.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1565	1630	890	4085	550	330	445	1325
Large Related	290	355	70	715	80	175	195	450
Elderly	1045	520	270	1835	1240	650	345	2235
Other	1230	1055	845	3130	610	275	300	1185
Total need by income	4130	3560	2075	9765	2480	1430	1285	5195
Source: 2012-2016 CHAS								

Table 40. Cost Burden by tenure status and household composition

The maps below display the percentage of the population who are cost-burdened by census tract using data from the 2014-2018 American Community Survey 5-Year Estimates. The first map shows the geographic distribution of cost-burdened homeowners.

There are three areas that stand out as having a significantly high cost burden rate among homeowners: Loch Lomand neighborhood, Cresthaven neighborhood, and a collection of neighborhoods in the southeast that includes Garden Isles, Snug Harbor, Cypress Cove, and Santa Barbara Estates.

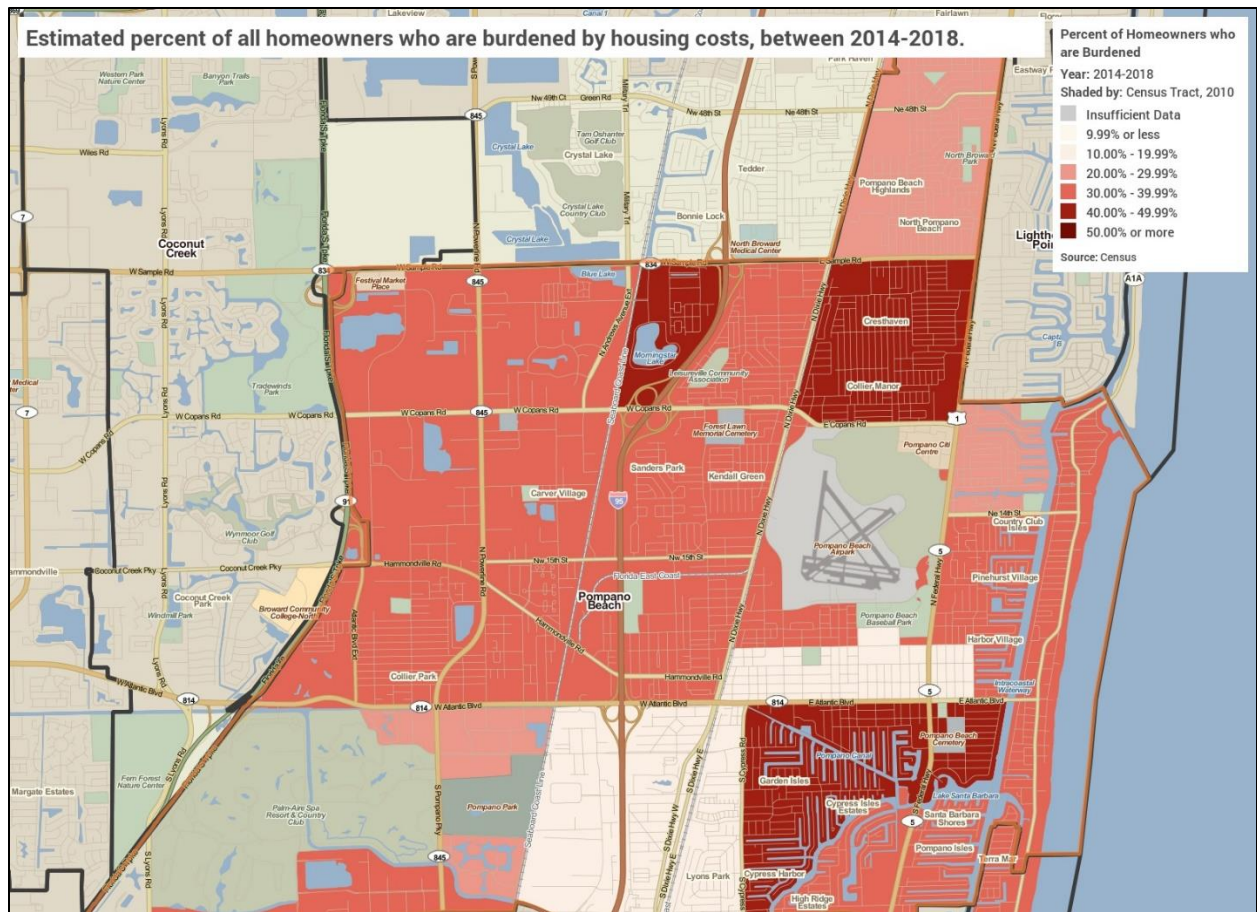


Figure 27. Homeowner cost burden by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimated via PolicyMap.

The second map, below, shows the geographic distribution of cost-burdened renters. Rates of renter cost burden are high throughout the City, with particular concentrations in the darkest shaded areas where 70% or more of renter households are cost burdened, including neighborhoods like Pompano Air Park, Blanche Ely, and the eastern half of the Cresthaven neighborhood.

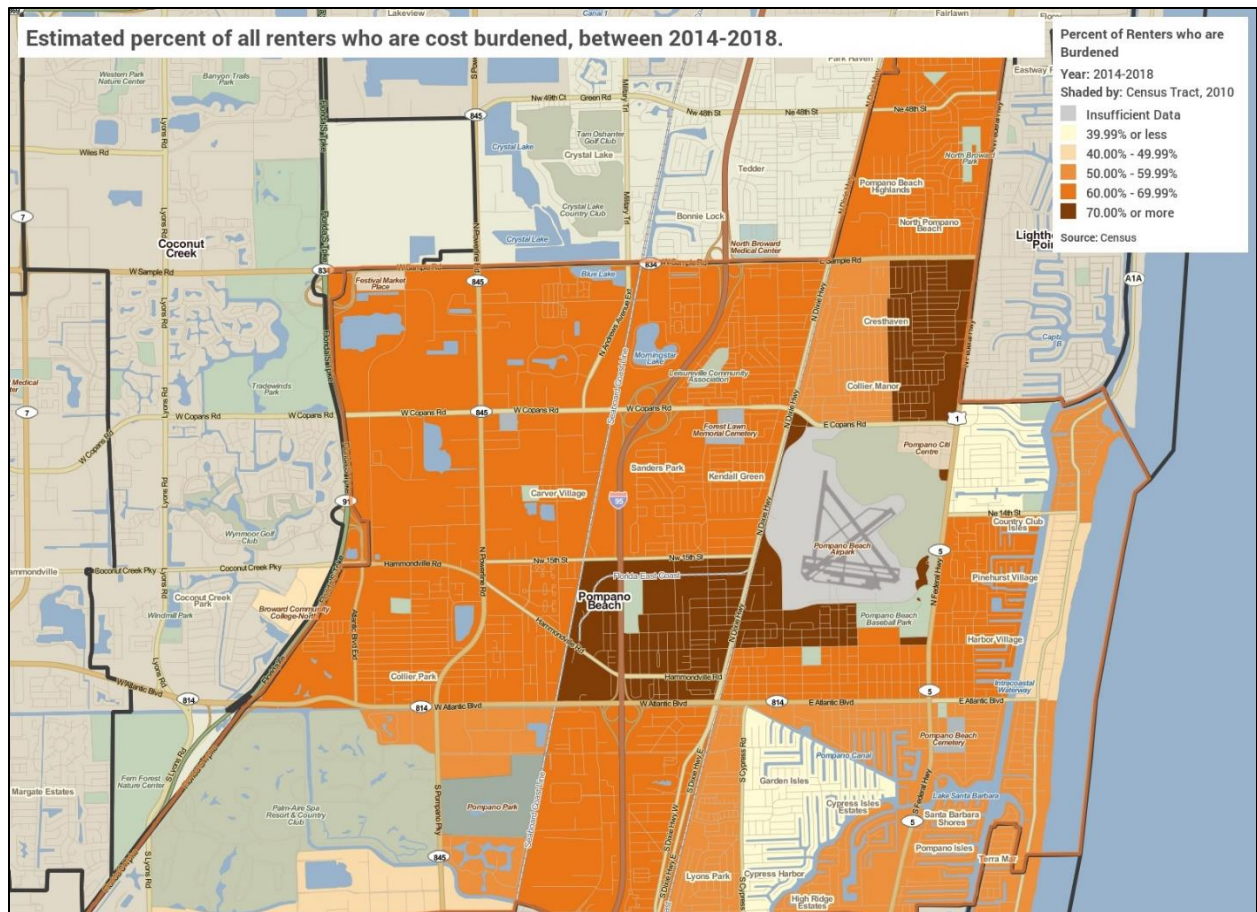


Figure 28. Renter cost burden by census tract, City of Pompano Beach.

Source: 2014-18 5-year ACS estimated via PolicyMap

The table below shows households that face ‘severe’ cost burden. A severely cost burdened household is one in which 50% or more of their income goes to housing costs (as opposed to the 30% threshold for ‘cost burden’). Similar to standard cost burdened rates, renters are more likely than homeowners to have a severe housing cost burden. According to the 2012-2016 CHAS Data, there are 13,015 renters and 10,505 owners in the 0%-80% AMI income range. Approximately 43.3% of renters and 24.5% of homeowners in this income range report being severely cost burdened.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,395	745	60	2,200	345	175	150	670
Large Related	230	160	35	425	40	120	80	240
Elderly	820	315	85	1,220	720	280	115	1,115
Other	1,100	605	80	1,785	340	180	30	550
Total need by income	3,545	1,825	260	5,630	1,445	755	375	2,575

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Source: 2012-2016 CHAS								

Table 41. Severe Cost Burden by tenure status and household income.

Housing Problems by Race/Ethnicity

The next four charts show the number of households by income level that do or do not have one of the four main housing problems by race/ethnicity.

0 – 30% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,420	770	845
White	3,245	475	625
Black / African American	2,090	180	140
Asian	45	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	990	120	75
Source: 2012-2016 CHAS			
Note: the four housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, 4) Cost burden greater than 30%.			

Table 42. Disproportionately Greater Need, 0 – 30% AMI

30 – 50% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5685	1555	0
White	2560	1035	0
Black / African American	1920	290	0
Asian	65	20	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	995	215	0

30 – 50% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Source: 2012-2016 CHAS			
Note: the four housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, 4) Cost burden greater than 30%.			

Table 43. *Disproportionately Greater Need, 30 – 50% AMI*

50 – 80% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,260	3,990	0
White	2,165	2,280	0
Black / African American	1,175	735	0
Asian	80	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	20	0	0
Hispanic	735	865	0
Source: 2012-2016 CHAS			
Note: the four housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, 4) Cost burden greater than 30%.			

Table 44. *Disproportionately Greater Need, 50 – 80% AMI*

80 – 100% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,280	3,110	0
White	830	2,060	0
Black / African American	195	660	0
Asian	50	15	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	205	295	0

80 – 100% of Area Median Income			
Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Source: 2012-2016 CHAS			
Note: the four housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, 4) Cost burden greater than 30%.			

Table 45. Disproportionately Greater Need, 80 – 100% AMI.

In Pompano Beach, approximately 79.9% (not including households with no or negative income) of extremely low-income households have at least one housing problem. According to the data provided by CHAS, there is one racial group disproportionately impacted by housing problems for this income group. One hundred percent of Asian households reported a housing problem. However, there are only an estimated 45 households in this group.

Compared to extremely low-income households, very low-income households have a lower overall rate of housing problems. There is one group disproportionately impacted. One hundred percent of American Indian or Alaska Native households reported a housing problem in this income group.

Just over half (51.6%) of all low-income households have at least one housing problem. Two racial groups reported disproportionately high housing problem rates. Approximately 80% of Asian households and 100% of Pacific Island households have a housing problem.

Moderate income households have noticeably lower rates of housing problems. Only 29.2% of the City's households in this group have a housing problem. There are two groups with a significantly higher housing problem rate. Approximately 77% of Asian households and 41% of Hispanic households have a housing problem.

Severe Housing Problems

A review of Housing Assessment data provided by HUD offers information that can be analyzed and used to determine any racial or ethnic groups that may have disproportionally higher housing needs than other ethnic groups in the community. HUD has determined that a disproportionally higher need exists when the percentage of persons in a given category is at least 10 percentage points higher than the percentage of persons in the category as a whole.

0 – 30% of Area Median Income			
Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,590	1,600	845
White	2,805	910	625
Black / African American	1,780	485	140
Asian	45	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	920	195	75
Source: 2012-2016 CHAS			
Note: the four severe housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than 1.5 persons per room, 4) Cost burden greater than 50%.			

Table 46. Severe Housing Problems, 0 - 30% AMI

30 – 50% of Area Median Income			
Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,215	4,025	0
White	1,410	2,185	0
Black / African American	1,050	1,155	0
Asian	50	40	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	565	645	0
Source: 2012-2016 CHAS			
Note: the four severe housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than 1.5 persons per room, 4) Cost burden greater than 50%.			

Table 47. Severe Housing Problems, 30 – 50% AMI

50 – 80% of Area Median Income			
Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,375	6,870	0
White	655	3,790	0
Black / African American	395	1,515	0
Asian	40	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	20	0
Hispanic	235	1,365	0
Source: 2012-2016 CHAS			
Note: the four severe housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than 1.5 persons per room, 4) Cost burden greater than 50%.			

Table 48. Severe Housing Problems, 50 – 80% AMI

80 – 100% of Area Median Income			
Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	500	3,895	0
White	235	2,655	0
Black / African American	110	745	0
Asian	50	15	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	100	395	0
Source: 2012-2016 CHAS			
Note: the four severe housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than 1.5 persons per room, 4) Cost burden greater than 50%.			

Table 49. Severe Housing Problems, 80 – 100% AMI

In Pompano Beach, approximately 77.7% of extremely low-income households have at least one severe housing problem. There is one racial group disproportionately impacted by severe housing problems in this income group. One hundred percent of extremely low-income Asian households report a severe housing problem. As noted, this population is relatively small.

When compared to extremely low-income households, very low-income households have a significantly lower rate of severe housing problems. Approximately 44.4% of all households in this income group have a severe housing problem and one racial or ethnic group, Asians, are disproportionately impacted.

Jurisdiction-wide only 16.7% of low-income households have at least one severe housing problem. One group reports a disproportionately high rate of severe housing problems. Approximately 42% of Asian households have a severe housing problem.

Moderate income households have the lowest rate of severe housing problems at 11.4%. There are no groups that are disproportionately impacted by severe housing problems.

Publicly Supported Households

Within the City of Pompano Beach, there are 2,659 assisted housing units, including 5 public housing units owned by the Housing Authority of Pompano Beach (HAPB). HAPB also manages 1,096 Housing Choice Vouchers (Section 8).

Pompano Beach	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1	20.00%	4	80.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	58	50.00%	24	20.69%	32	27.59%	1	0.86%
Other Multifamily	3	4.76%	55	87.30%	5	7.94%	0	0.00%
HCV Program	71	7.95%	822	92.05%	N/a	N/a	N/a	N/a
Source: HUD AFFHT0004, Table 6 - Publicly Supported Households by Race/Ethnicity, November 2017; HAPB								
Data Note: Numbers presented are numbers of households not individuals.								

Table 50. Voucher holders and public housing residents by race/ethnicity, Housing Authority of Pompano Beach.

The Housing Choice Voucher Program (HCV) provides "tenant-based" rental assistance for assisting low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. A housing subsidy is paid to the landlord/management directly by the housing authority on behalf of the participating voucher holder family, then the family pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Over 890 households are in the HCV program and only a few households are in all other programs combined. Black/African American households make up the majority of all households.

HCV also authorizes a variety of "project-based" rental assistance programs, under which the owner reserves some or all of the units in a building for low-income tenants. A tenant who leaves a subsidized project will lose access to the project-based subsidy. The Project-Based Section 8 developments, New Vistas and St. Elizabeth Gardens, both have a relatively diverse population. Black/African American residents make up 38% and 18% of the households, respectively. St. Joseph Manor, the other Multifamily Assisted Housing development, is much less diverse. Black/African American residents make up a large majority, approximately 85%.

In addition to HUD-assisted properties, there are several other publicly assisted developments funded by numerous sources including Low Income Housing Tax Credits, USDA Rural Development, a State

Apartment Incentive Loan program, and funding from the local Housing Finance Authority. Sourced from the Assisted Housing Inventory (AHI) database administered by the University of Florida Shimberg Center for Housing Studies, the table below shows the 22 affordable housing developments in the City of Pompano Beach, their address, the subsidy programs used in the development, the total number of units, whether the owner is a for-profit or non-profit, and the estimated expiration year depending on the programs used. The racial/ethnic composition of these subsidized units was not readily available.

Development	Address	Program(s)	Subsidized Units	Owner Type	Expiration Year
Golden Acres	1050 N.S. 18 th Dr	Rental Assistance/RD; Section 514/516	173	Limited Dividend	2043
St. Elizabeth Gardens	801 NE 33rd St	Housing Credits 9%; Rental Assistance/HUD; Section 202 Direct Loan	151	Non-Profit	2069
Eagle Pointe	2001 W Atlantic Blvd	Credits 4%; SAIL; Section 207/223(f)	192	For-Profit	2055
Laguna Pointe	905 SW 15th St	Housing Credits 4%; Local Bonds; SAIL; Section 207/223(f)	188	For-Profit	2054
Park Ridge Court Apartments	5200 NE 5th Ter	Rental Assistance/HUD	37	Non-Profit	2034
New Vistas	868 SW 10TH St	Rental Assistance/HUD; Section 202 Direct Loan	16	Non-Profit	2030
Oaks At Pompano (the)	501 SW 1ST Court	Housing Credits 4%; Local Bonds; Section 207/223(f)	224	For-Profit	2028
Pinnacle Village Apartments	973 North Powerline Rd	HUD Use Agreement	148	For-Profit	2027
St. Joseph Manor	1220 NW 6th Ave	Rental Assistance/HUD; Section 202 Capital Advance	62	Non-Profit	2020
Ben Turner Ridge	230 NW 10th St	Public Housing	5	Public Housing Authority	
Island Club Apartments	3505 W Atlantic Blvd	Local Bonds; Section 223(f) Refi/Purchase	52	For-Profit	
Regency Gardens	1520 NW 17 th Ave	Housing Credits 4%; Housing Credits 9%; Local Bonds; SAIL	94	Non-Profit	2054
Atlantic Palms	1290 N.W. 6 th Ave	Housing Credits 9%	145	For-Profit	2054
Pinnacle Village	801 North Powerline Rd	Housing Credits 4%; Local Bonds	148	For-Profit	2056
Golden Villas	1325 NW 18 th Dr	Housing Credits 4%; Legislative Appropriation; Local Bonds	120	For-Profit	2040
Golden Square	1415 NW 18 th Dr	Housing Credits 9%	182	For-Profit	2058

Development	Address	Program(s)	Subsidized Units	Owner Type	Expiration Year
Captiva Cove	1201 S Dixie Highway W	Housing Credits 4%; State Bonds; State HOME	264	For-Profit	2064
Captiva Cove II	1201 S Dixie Highway W	Housing Credits 4%; State Bonds; State HOME	88	For-Profit	2046
Residences At Crystal Lake	350 N.E. 32 nd Court	Housing Credits 4%; Local Bonds; SAIL	92	For-Profit	2066
City Vista	NE Corner of NW 6 th Ave & MLK Jr Blvd	Housing Credits 9%	107	For-Profit	2067
Heritage at Pompano Station	NE Corner of Flagler Ave & NE 4 th St	Housing Credits 9%	116	For-Profit	2067
Marquis	NW 8 th St & Dr. BJ McCormic Ave	Housing Credits 4%; SAIL	55	Not Available	2071

The map below shows the location of each property. The map indicates subsidized/assisted housing properties are primarily clustered in three Census tracts: Census tract 304.02, 305, and 308.01. All of these tracts are majority-minority, with tract 305 and 304.02 composed of between 84% and 95% Black/Hispanic population. This distribution of assisted housing units in the City is a fair housing concern because concentration of low-income residents in majority-minority and high poverty neighborhoods restricts the housing choices of protected classes to less desirable neighborhoods. The City should work to locate future assisted housing properties in higher opportunity neighborhoods with smaller shares of minority residents and lower poverty rates.

Assisted Housing Inventory Properties in Pompano Beach, FL

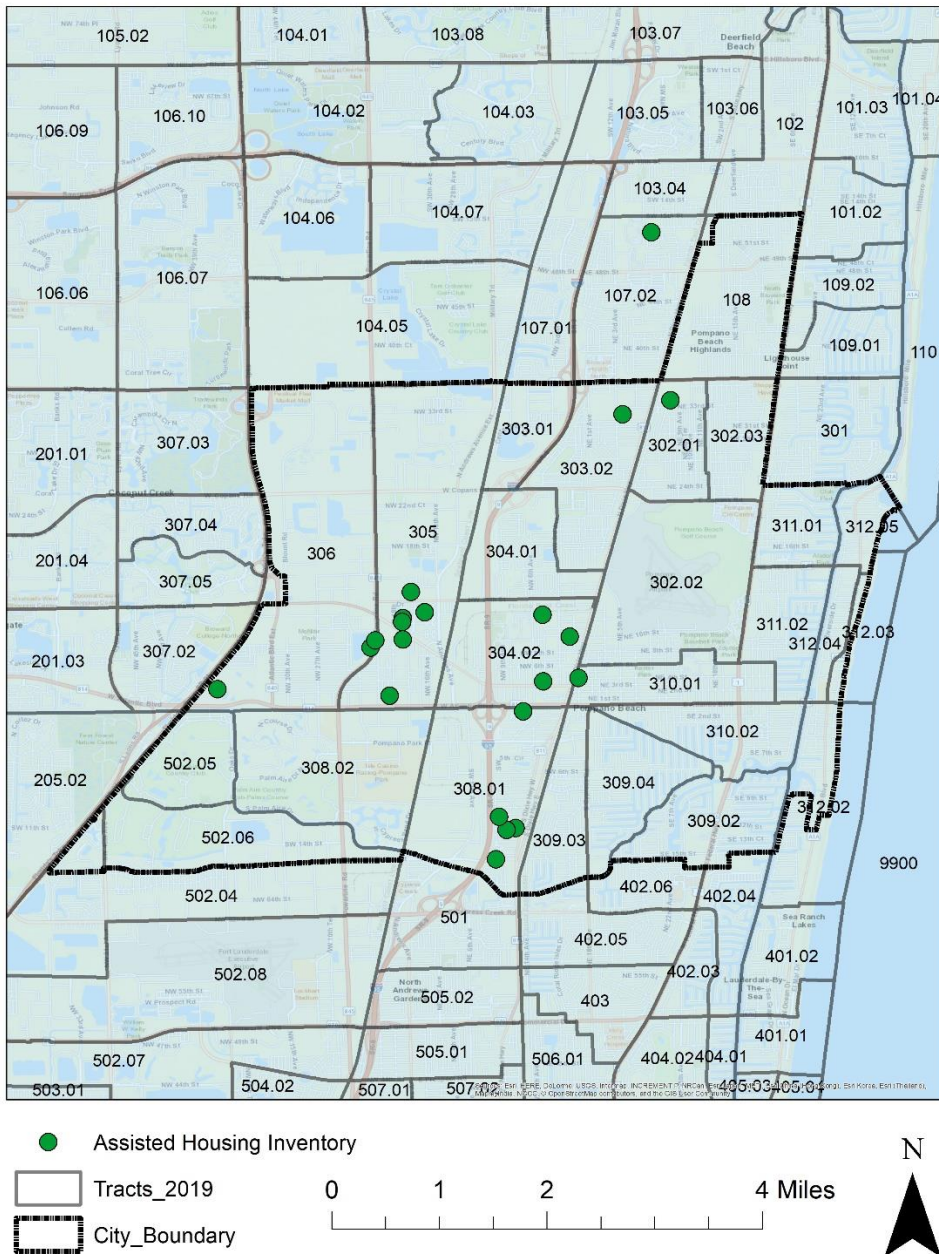


Figure 29. Assisted Housing Inventory property locations in City of Pompano Beach, FL.

Source: FHC analysis of University of Florida Shimberg Center Assisted Housing Inventory.

Evaluation of Jurisdiction's Current Fair Housing Legal Status

This section provides information on the City of Pompano Beach's current fair housing legal status including information about the number and type of fair housing complaints, the existence of fair housing discrimination suits filed by the U.S. Department of Justice, as well as a discussion of other fair housing concerns or problems.

The federal Fair Housing Act is administered and enforced by HUD's Department of Fair Housing and Equal Opportunity (FHEO) and the Department of Justice's Housing and Civil Enforcement Section. The FHEO also administers the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiative Program (FHIP). These programs provide funding to States, local public agencies, and non-profit organizations to assist victims of housing discrimination and to promote awareness of fair housing laws.

In addition to the federal Fair Housing Act, the State of Florida has adopted a state fair housing law that is enforced by the Florida Commission on Human Relations (FCHR). Title XLIV, Chapter 760 of the Florida Statutes, "Civil Rights," covers discrimination in the treatment of persons and minority representation. Part II, the Florida Fair Housing Act, (ss. 760.20 – 760.37), prohibits discrimination in the sale, rental, advertising, financing, or provision of brokerage services for housing. The Florida Fair Housing Act is substantially equivalent to the federal Fair Housing Act and protects persons from housing discrimination on the bases of race, color, religion, national origin, sex, pregnancy, disability, and familial status. In 2000, the Florida Fair Housing Act (FFHA) was amended to include affordable housing as a protected class (Section 760.26, Florida Statutes).

In the City of Pompano Beach and neighboring region there are three main fair housing agencies that enforce fair housing laws and provide fair housing outreach and education services at the local level. Those agencies are: 1) the Legal Aid Service of Broward County (LASBC), 2) Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.), and 3) the Broward County Office of Equal Opportunity.

Legal Aid Service of Broward County's (LASBC) mission is to provide high quality free civil legal advice, representation and education to the disadvantaged of Broward County so as to improve the lifestyle and living conditions of the low-income community and encourage self-sufficiency. LASBC promotes fair housing for all person including Spanish and Creole speaking residents across Broward County. Fair housing refers to laws that make it illegal to discriminate in activities related to the sale, rental or lease of housing.

Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.) is a private fair housing, not-for-profit, 501 (c) 3 corporation established in 1988, dedicated to eliminating housing discrimination and promoting fair housing. Its programs are designed to ensure that people are offered the right to select housing of their choice without discrimination based on race, religion, color, national origin, sex, disability, marital or familial status, or such other protected classes as may be conferred by federal, state or local laws. HOPE,

Inc. is engaged in testing for fair housing law violations and pursuing enforcement of meritorious claims. Since its inception, HOPE has achieved settlements for victims of housing discrimination cases totaling over \$12 million.

The Broward County Office of Equal Opportunity is a HUD-designated FHAP agency and offers discrimination complaint investigation and resolution, training, outreach, and education.

Fair Housing Complaints or Compliance Reviews

A review of fair housing complaint data helps identify trends in housing discrimination in the City to inform specific fair housing actions that may be needed to address the cause of any trends. As summarized in the table below, between 2015 and 2020, 32 fair housing cases (about 6 cases per year) were filed in the City of Pompano Beach based on statistics provided by HUD and FCHR. In several of the cases, complainants alleged discrimination based on multiple protected classes bringing the total number of complaints filed to 36.

The vast majority of discrimination cases in Pompano Beach are based on disability, with national origin and race as the second and third highest basis for discrimination, respectively.

Basis	2015	2016	2017	2018	2019	2020*	Total
Race	1		1	2			4
Disability	3	1	8	4	4	1	21
Familial Status	2				1		3
Sex							
National Origin		1	6				7
Color							
Religion							
Retaliation	1						1
Total	7	2	15	6	5	1	36
Source	FCHR; HUD FHEO Region IV						
*	From January 1 through February 7, 2020						

Table 51. Basis for Housing Discrimination Cases in City of Pompano Beach, 2015-2020.

Fair Housing Discrimination Cases in City of Pompano Beach, 2015 - 2020

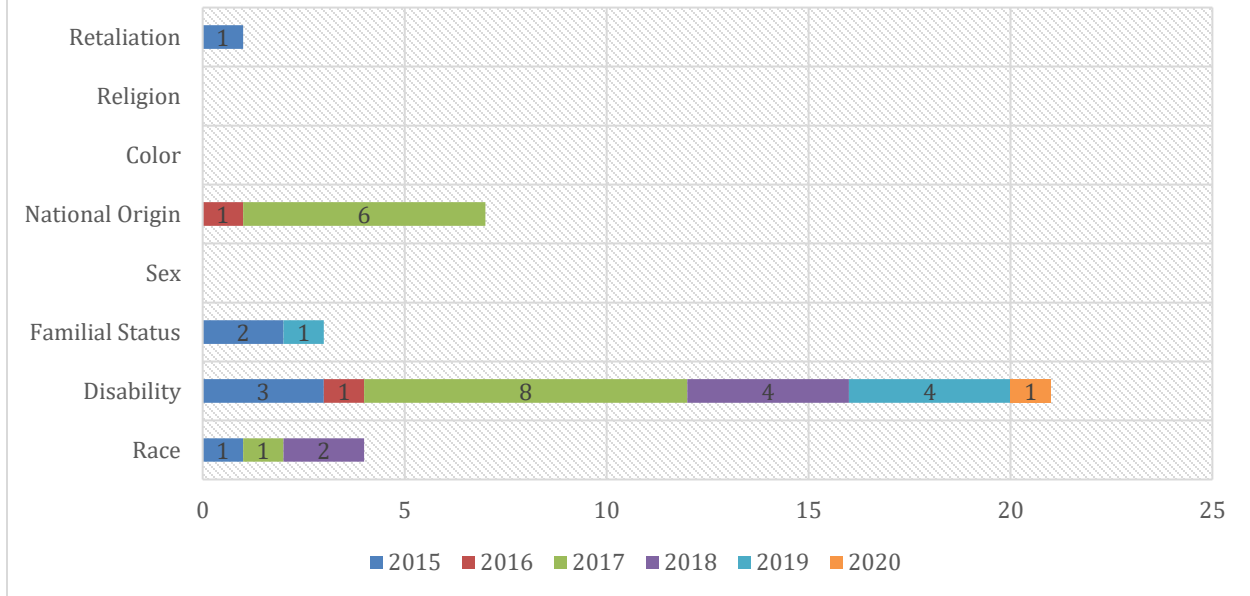


Figure 30. Fair Housing discrimination cases in City of Pompano Beach, 2015 – 2020.

Source: FCHR; HUD FHEO Region IV.

The table below compares the City of Pompano Beach’s housing complaint data to the nation and to Florida. The significant share of cases based on disability mirrors trends at the national and state level. Conversely, the City of Pompano Beach has a disproportionate share of cases based on national origin compared to national and state figures.

Basis for Housing Discrimination cases nationally, in Florida, and City of Pompano Beach, 2018			
Basis	Nation	Florida	City of Pompano Beach
Race	16.21%	20.20%	12.50%
Disability	51.78%	55.56%	65.63%
Familial Status	7.29%	8.08%	9.38%
Sex	14.72%	4.04%	-
National Origin	10.03%	11.11%	21.88%
Color	1.67%	0.00%	-
Religion	2.68%	4.04%	-
Source	National Fair Housing Alliance, The Case for Fair Housing 2018 Fair Housing Trends Report; FCHR 2018 Annual Report; HUD FHEO Region IV. Percentages may add to more than 100% because discrimination was based on multiple protected classes.		

Table 52. Basis for housing discrimination cases in U.S., Florida, City of Pompano Beach, 2018.

The review of fair housing complaint data is not enough to identify the fair housing issues in the City since complaints are based on allegations of unlawful discrimination. Fair housing issues may also be identified through a review of the disposition of the cases. The 32 cases reviewed were resolved in the following ways:

- Complaint withdrawn by complainant after resolution – 7 cases or 21.88%;
- Complaint withdrawn by complainant without resolution; 1 case or 3.13%;
- Conciliation/settlement successful; 9 cases or 28.13%;
- Dismissed for lack of jurisdiction; 1 case or 3.13%;
- FHAP judicial consent order; 1 case or 3.13%; and
- No cause determination; 7 cases or 21.88%.

The high number of cases that were found to have no cause may indicate an individual's lack of awareness about their rights under the fair housing laws. This may also contribute to the under-reporting of discrimination and supports the need for additional fair housing education. Additionally, the nature of the complaints that were found to have cause may indicate the need for education and outreach on specific protections.

Fair Housing Risk Management Process

On November 13, 2020, HUD issued a Letter of Closure (LOC) regarding a Fair Housing Risk Management Process initiated by the Office of Fair Housing and Equal Opportunity (FHEO) on March 31, 2020. The LOC details a set of high-risk indicators present in the City, including an outdated AI and a high concentration of LEP persons. In the LOC, HUD strongly encourages the City to complete a LEP Four Factor Analysis and create a language access plan to mitigate the risk of discrimination on the basis of national origin. This AI satisfies the requirement for completion of an updated AI but does not address the LEP Four Factor Analysis and associated language access plan.

In addition to the two risk factors discussed above, the LOC also identifies the following risk factors:

- Jurisdictional segregation
- Regional segregation
- Fair housing complaint data
- CPD risk status
- Clustering of low-income housing in low-income and high minority census tracts

The City of Pompano Beach will work to leverage the data, identified impediments, and action plan included in this AI to address HUD's risk factors.

Fair Housing Discrimination Suits Filed by Department of Justice

There is no unresolved letter of finding issued by or lawsuits filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law against the City.

There is also no claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Hate Crimes Data

According to the available data, hate crimes have risen since 2016. However, at the county level they were not as common in 2018 as in 2017. In Pompano Beach, only four hate crimes were reported by the Pompano Beach Police department for both 2017 and 2018. This matches the statewide trend of consistent reports for those two years.

	2016	2017	2018
Pompano Beach Police Department	1	4	4
Broward County (All Police Departments)	17	40	28
Total Florida (state)	124	169	168
Source: 2016, 2017 & 2018 Hate Crimes in Florida, Attorney General Report			

Table 53. Hate Crime data 2016, 2017, 2018, City of Pompano Beach, Broward County, Florida.

Reasons for any Trends or Patterns

The National Fair Housing Alliance states in its 2019 Fair Housing Trends Report that the large number of complaints based on disability can be partially attributed to the fact that disability cases are often more overt and more easily detected than other types of housing discrimination. Disability complaints usually involve denial of a request for a reasonable modification or accommodation or involve a multi-family property that is not accessible in obvious ways.

From demographic trend data discussed earlier in this AI, Hispanics and the population born in a foreign country are the fastest growing groups in the City. This increasing share of the population that is foreign born might explain the relatively large share of housing discrimination cases based on national origin in the City.

Identification of Impediments to Fair Housing Choice

Public Sector

This section of the AI examines public policies of the jurisdiction and seeks to identify impediments to fair housing choice.

Zoning and Site Selection

Land use and zoning laws are a significant contributing factor to segregation. This section of the AI examines public policies of the jurisdiction and seeks to identify impediments to fair housing choice. The local government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that can be constructed, the density of housing, and various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies, therefore, determine if fair housing is to be promoted or passively tolerated.

There are no unusual characteristics contained in the City of Pompano Beach's Residential Zoning codes. Conversely, the City's residential zoning code permits diverse uses including ADU's (Accessory Dwelling Units) and density bonuses for affordable housing that encourage new development of decent, safe, affordable housing throughout the area.

Zoning codes have been found to have a substantial impact on the rights of persons with disabilities to fair housing. By intentionally clustering people with disabilities in a few areas zoned for assisted living facilities, cities may cut off people with disabilities from the broader community and limit their housing choice. State law requires that cities allow "community residents," small group homes with less than 14 or 6 (different parts of the law conflict) residents with disability in single family and multi-family residential zones with few restrictions. However, many cities have been slow to integrate this rule into their local zoning code. The City of Pompano Beach, in 2018, realizing that the City's zoning code might not only hurt people with disabilities but might also open the City up to law suit, released a report titled "Pompano Beach, Florida: Principles to Guide Zoning for Community Residences for People with Disabilities." It recommended a redefinition within the Pompano Beach Zoning code of several terms related to various community residences, the provision of a special exception requirements and review standards for community residences, and the amendment of certification and zoning districts to clarify where and how community residences would be permitted. These findings were accepted and integrated into the Zoning Code through City Ordinance No. 2018-60. Under this ordinance, "the City of Pompano Beach is hereby amending its land use regulations to make the reasonable accommodations the Fair Housing Act requires by removing any terms and conditions that have the effect of limiting or making housing unavailable to people with disabilities while preserving the ability of community residences for people with disabilities to emulate a family and achieve normalization and community integration of their residents." This study and ordinance seriously addressed the threat that restrictive zoning could pose to the fair housing rights of people with disabilities.

Zoning within the City's urban core is primarily residential or multi-family (small to mid-size, not exceeding 45 units per acre), allowing for a diverse number of uses, including new and rehabilitated affordable housing.

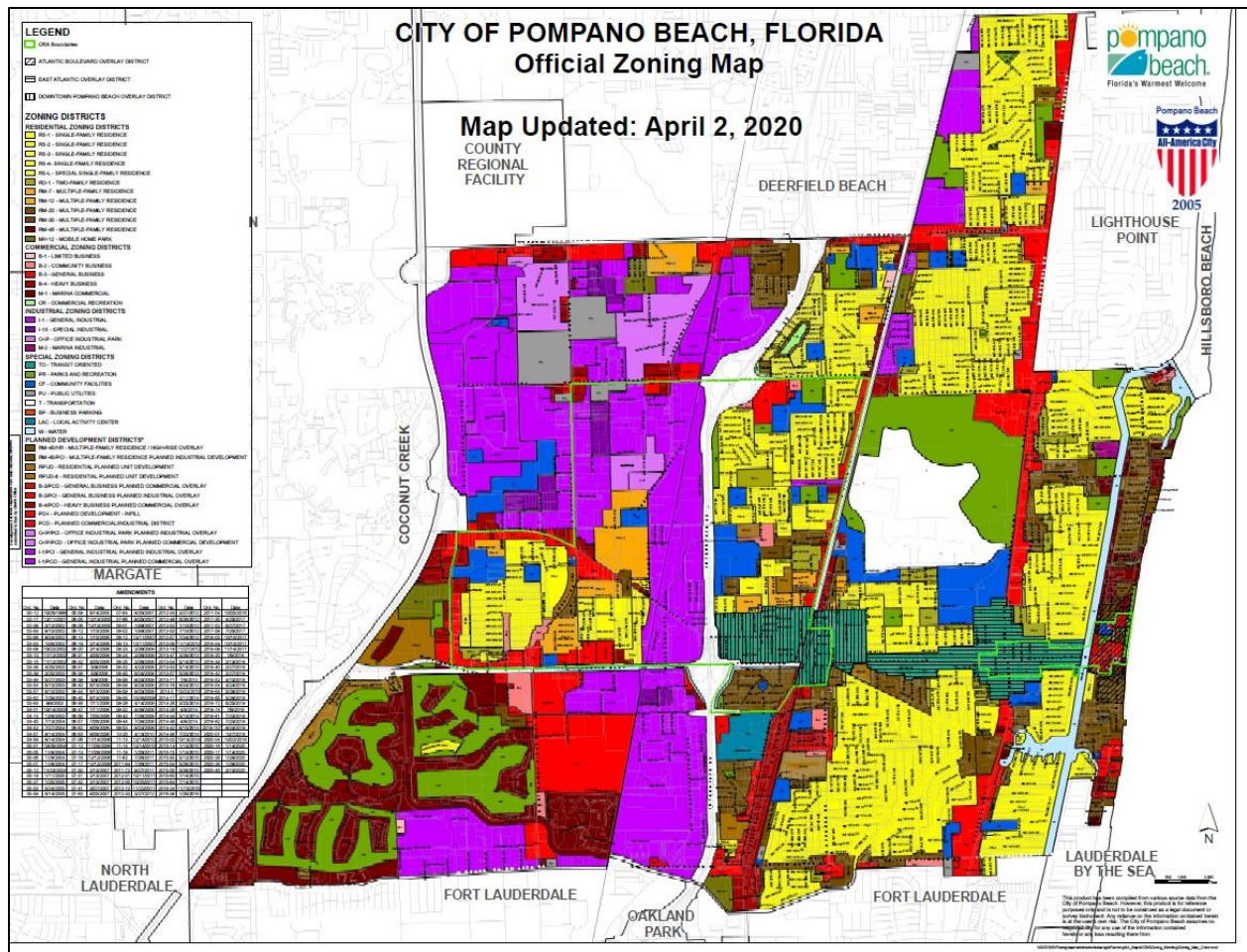


Figure 31. Official Zoning Map, City of Pompano Beach.

Source: Department of Planning & Zoning, City of Pompano Beach.

The City of Pompano Beach Land Development Code recognizes thirty-three (33) zoning districts. Of these, eighteen are exclusive to residential construction. Although not identified as inclusionary zoning (a locally adopted requirement to set aside a percentage of housing units in new developments for affordable housing), the City of Pompano Beach has adopted a Flexibility Zone encompassing the entire city that permits all developers the opportunity to rearrange residential dwelling units to commercial land use designations based upon set aside of a percentage of these additional dwelling units for affordable housing or through payment of funds in lieu of providing the required affordable dwelling units. To be most effective, an inclusionary zoning ordinance should be mandatory, requiring a certain threshold of a development’s units be affordable. Voluntary density bonuses, in this case a Flexibility Zone, are typically not as effective at expanding a community’s affordable housing supply.

Of particular interest to this AI are questionable zoning practices in areas marked by high rates of segregation and poverty. A focus on zoning districts in high poverty and majority-minority neighborhoods, and their respective use and density requirements can reveal land use requirements effectively maintaining concentration of low-income households by race/ethnicity. Jurisdictions with significant

disparity in density permissions between low-income and segregated neighborhoods compared to areas populated with high-income and White households may be effectively reinforcing low-income and race/ethnicity segregation patterns.

A review of Pompano Beach’s zoning code identifies the following zones in high poverty, high segregation census tracts, including the City’s R/ECAP:

Zoning District	Max. Units / Acre	Minimum Square Footage/Acre
RS1 – Single Family Residential 1	5-16 DU/AC depending upon Land Use Classification	1500
RS2 – Single Family Residential 2	5-16 DU/AC depending upon Land Use Classification	1250
RS3 – Single Family Residential 3	5-16 DU/AC depending upon Land Use Classification	750
RS4 – Single Family Residential 4	5-16 DU/AC depending upon Land Use Classification	675
RSL – Single Family Residential – Leisureville	5-16 DU/AC depending upon Land Use Classification	600
RD1 – Two Family Residential	12 DU/AC	750
RM7 – Multi-Family Residence 7	7 DU/AC	950
RM12 – Multi-Family Residence 12	12 DU/AC	500-950
RM20 – Multi-Family Residence 20	20 DU/AC	500-950
RM30 – Multi-Family Residence 30	30 DU/AC	500-950
RM45 – Multi-Family Residence 45	45 DU/AC	500-950

As indicated above, many of the zoning districts allow for flexibility in density and other construction requirements for new rental and residential housing units and promote increased availability of housing choices. Additionally, the city is finalizing updates to its Comprehensive Plan through an effort named PlanItPompano. Among the intended amendments is a renewed focus on the Housing Element with specific emphasis on creating new goals that are intended to result in the creation of new affordable housing citywide. These Comprehensive Plan amendments are scheduled for final approval and adoption before the end of 2020.

In advance of the final update to the Comp Plan Land Use Element, City staff provided a report to the City Commission that outlined its progress and included the following information regarding goals and objectives intended to be included in the final updated Plan:

Goal 3: To provide structurally safe, affordable, uncrowded and otherwise adequate residential shelter for all existing and anticipated future residents of the City of Pompano Beach that utilize

energy efficient, sustainable design, resilient construction techniques, materials and renewable energy resources.

Objective 03.01.00 – Housing to Accommodate Future Population. The City should provide, through the undertaking or support of public and private development efforts, sufficient housing units through the long-range planning horizon to meet the anticipated population through 2040. Provision of these units shall be based on the need for adequate and affordable housing for all segments of the existing and future population including those households with very-low, low, and moderate income and those with special housing needs, including homelessness.

Policy 03.01.01 The City's adopted future land use map shall provide locations for residentially designated property at a variety of density classifications. The relative location of parcels with different density designations shall be based on sound planning principles.

Policy 03.01.02 The City shall continue to support Community Redevelopment Agency (CRA) and Department of Housing and Urban Improvement (OHUI) efforts to acquire funds and administer a variety of local, State and Federal housing improvement and low-income subsidy programs. In addition, the City shall continue to provide information about low cost housing opportunities to all residents especially those with very-low, low, and moderate income as well as the homeless.

Policy 03.01.03 In order to provide affordable housing, the City shall consider and, where appropriate, support revisions to land development regulations to recognize and locally implement technical innovations in housing construction and site development.

Policy 03.01.04 The City shall continue to cooperate with other local governments concerning providing affordable housing for very-low, low, and moderate-income households and the homeless.

Policy 03.01.05 Affordable housing will be promoted in a manner which reflects the relative needs of all groups in the city and is oriented toward the goal of deconcentrating poverty.

Policy 03.01.06 The City will continue to work towards implementing a Housing First strategy to address homelessness. An inventory of affordable housing will be identified that can accommodate the homeless through landlord recruitment, identification of existing affordable housing options and facilitation of creative housing solutions.

Policy 03.01.07 The City will continue to work on developing a recurring funding source for a Pompano Beach Rapid Rehousing Program with the following core components: housing location, rent and move-in financial assistance, and case management.

Policy 03.01.08 The City will follow the lead of Broward County and allow single family homes to add one deed restricted affordable accessory unit or apartment without the need to allocate

density for that unit. All other applicable sections of the code will continue to apply to the construction of the accessory unit/apartment. To provide structurally safe, affordable, uncrowded and otherwise adequate residential shelter for all existing and anticipated future residents of the City of Pompano Beach that utilize energy efficient, sustainable design, resilient construction techniques, materials and renewable energy resources.

Policy 03.01.09 The City will continue to use available density bonus programs provided in the County Land Use Plan to increase the supply of affordable housing, such as allowing residential development in the County's Commerce land use category by right under certain conditions.

Policy 03.03.03 To meet the goal of de-concentration of poverty, the City will continue to follow all State agency regulations in regard to locating subsidized housing while requiring the distance separation described by the Florida Housing Finance Agency funding guideline that defines a one-half mile radius separating Low Income Housing Tax Credit projects from each other.

Additionally, incentives adopted by the City of Pompano Beach further encourage affordable housing development through the following:

- Reduction or waiver of impact fees. Homes that are identified as affordable may apply to have impact fees reduced or waived (subject to funding availability).
- Density bonus for inclusionary housing development. Developers that agree to build affordable housing units are permitted to request an increase the density of the development provided there are no negative environmental impacts or other negative consequences.
- Accessory Residential units. Within certain zoning districts Accessory Residential units are permitted.
- Parking/Setback requirements. Developers of affordable housing may request relaxed parking/setback requirements.
- Flexible lot configuration. Within certain zoning districts developers may request flexible lot configurations (i.e. zero lot line).
- Transit-Oriented district. Within the City's Transit Oriented district, developers of 100 housing units or more must provide an affordable housing set-aside or provide payment in lieu.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Housing Authority of Pompano Beach (HAPB) owns and operates five public housing units and manages 1,096 Housing Choice Vouchers. Additionally, there are two housing developments managed and operated by the HAPB containing a total of 476 units: namely Golden Square/Golden Villas, a tax credit community; and Golden Acres, a subsidized USDA property.

HAPB policy permits administration of targeted funding/selection based upon the following criteria:

- Work Preference – One or more household members working twenty hours per more per week, attending school or a training program
- Elderly – One or more household members over the age of 62
- Disabled – One or more household members disabled
- Residency – One or more household members living or working in Pompano Beach

The Housing Authority follows best practices regarding (1) management of waiting lists by offering applicants to check their wait list status by phone; (2) purging of waiting lists every three years; and (3) establishing clear criteria for initial eligibility and subsequent selection of applicants from the existing waiting lists.

A review of the HAPB Administrative Plan finds no concerns regarding administration of HUD HCV and public housing units.

Policy evaluation for the HAPB revealed that the agency adheres to HUD requirements and follows best practice models pertaining to its Non-Discrimination policy contained within its Tenant Selection Policy.

Concentration of Voucher Holders

If a household is able to secure a housing voucher, whether project-based or tenant-based, that household's housing cost burden should, by definition, be eliminated. As demonstrated in this analysis, rates of housing cost burden in the City significantly outpace supply of naturally occurring and subsidized housing. The difference between supply and demand in the affordable housing market drives extreme demand for housing vouchers.

While access to a housing voucher is an absolute benefit, using a voucher can be a serious challenge for the household due to discrimination on the basis of source of income. In this case, the housing voucher is considered a source of income. Because Broward County has expanded its list of protected classes to include source of income, it is important to review the degree to which voucher holders are able to use those vouchers in high-opportunity census tracts.

The map below shows the concentration of housing choice vouchers by census tract in the City of Pompano Beach. The map shows vouchers as a share of the total housing units in a census tract. There are substantial concentrations of voucher holders in the same tracts this AI has identified as highly segregated and high poverty.

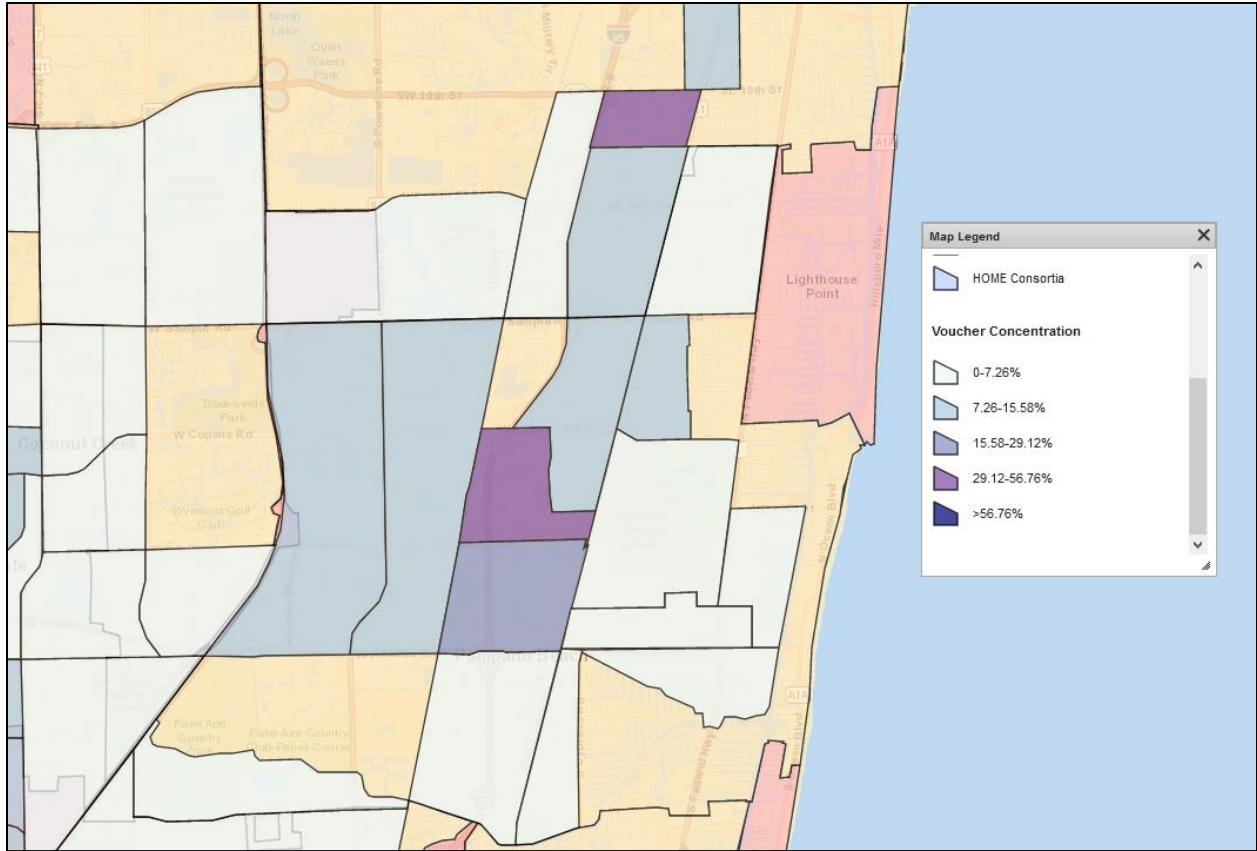


Figure 32. Concentration of housing choice voucher holders by census tract, City of Pompano Beach.

Source: HUD CPD Maps, Voucher Concentration, accessed July, 2020.

Of importance to this analysis is a more nuanced understanding of voucher utilization relative to access to opportunity. The Center on Budget Policy Priorities (CBPP) developed a mapping application that layers both voucher concentration and a composite index of HUD opportunity index data to show voucher utilization in high to low opportunity census tracts. The map below shows the CBPP analysis for the City of Pompano Beach. Each dot on the map represents the approximate location of 20 voucher holders and the shading represents the opportunity index value.

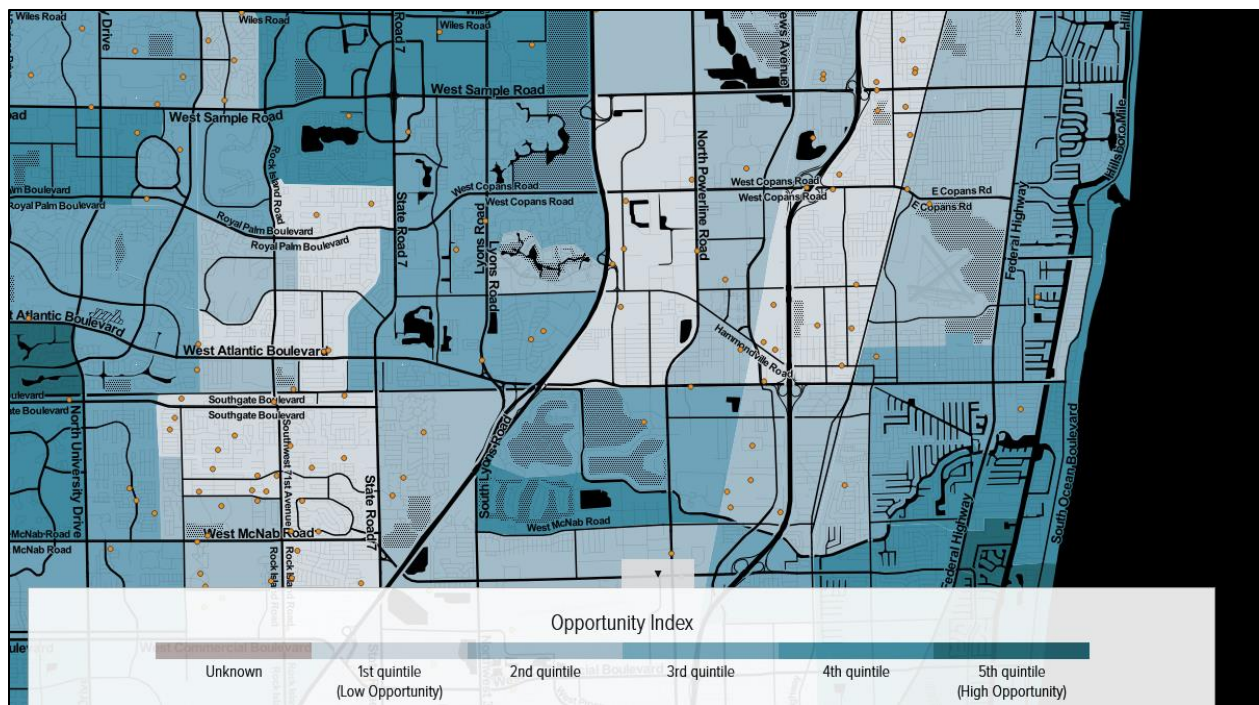


Figure 33. CBPP composite index of opportunity and voucher utilization, City of Pompano Beach.

Source: CBPP, accessed July 11, 2020. Available: <https://www.cbpp.org/research/housing/where-families-with-children-use-housing-vouchers>.

This analysis shows a definite concentration of vouchers in low-opportunity census tracts. This suggests training and outreach to landlords on protections on the basis of source of income is appropriate. The housing authority could also encourage HCV utilization in high opportunity neighborhoods by:

- Helping all voucher holders find suitable housing.
- Provide up to date information about facilities and services available in all neighborhoods in which housing is suitable to the needs of the voucher holders, to include schools, day care, health and welfare and other social service agencies, employment centers, and public transportation.
- Encourage minority voucher holders to look for housing in neighborhoods that are not traditional residential areas for the holder in question.
- Helping voucher holders confirm availability of units.
- Helping with transportation costs in high opportunity neighborhoods.
- Offering clear information on housing rights available to voucher holders, including fair housing protections at the federal, state, and local level.

Sale of Subsidized Housing and Possible Displacement

The fair housing planning guide published by HUD advises that jurisdictions should review any threat to possible displacement of low-income families as a result of the sale of publicly supported housing.

Housing property affordability requirements expire after a certain number of years, depending on the subsidy program used to capitalize the development. Once the affordability restrictions expire, the owner of the property is permitted to sell the property and the units may or may not be converted to market rate. Understanding this dynamic, jurisdictions should monitor affordable housing developments and their expiration year.

The Housing Authority of Pompano Beach primarily administers tenant-based vouchers (not subject to consideration in this section) and does not anticipate displacement of residents in its remaining five public housing units. For the two housing developments managed and operated by the HAPB, Golden Square/Golden Villas (a tax credit community) and Golden Acres (a subsidized USDA property), neither are due for subsidy expiration within the foreseeable future. The Golden Acres subsidy expiration is set for 2043, and Golden Square's subsidy expiration is set for 2058.

During the years covered by this AI, there are 62 units vulnerable to sale in the St. Joseph Manor development. St. Joseph Manor is operated by a non-profit organization called Catholic Health Services, a ministry of the Archdiocese of Miami. Given this information, it is unlikely that the Archdiocese will elect to sell the property.

Property Tax Policies

Property tax policies allow for accessibility for a significant number of protected classes to allow for greater affordability and accessibility of housing choice. The Broward County Property Appraiser offers the following exemptions for protected class members. This list is larger than other County Property Appraisers statewide.

- Disability Exemption: \$500
- Disability Exemption for Blind Persons: \$500
- Widowed Person Exemption: \$500
- Additional Low-Income Senior Exemption: additional \$25,000
- Veteran's Disability Exemption: \$5,000
- Veteran's Service-Connected Total and Permanent Disability Exemption: Full Exemption
- Combat-Wounded Florida Disabled Veteran Exemption: Exemption calculated based upon percentage of combat-wounded disability
- Totally and Permanently Disabled Exemption: Full Exemption
- Totally and Permanently Disabled First Responder Exemption: Full Exemption
- Surviving Spouse of Military Veteran or First Responder Exemption: Full Exemption

Planning and Zoning Boards

The City of Pompano Beach has committees that routinely make decisions with an impact on fair housing choice. These include the Planning and Zoning Board, the Zoning Board of Appeals, and Affordable

Housing Advisory Committee. These boards should represent the interests of all Pompano Beach residents and should be aware of and responsive to the needs of the City's protected classes.

Review of the Pompano Beach Planning and Zoning Board By-Laws appointment criteria finds that no protected class considerations are included in nomination and/or selection of appointed members. The City's Rules of Procedure indicate that the Zoning Board of Appeals, for instance, is composed of City Commission appointed members:

“Per Section 155.2203.1 [Rules of Procedure], the Zoning Board of Appeals shall adopt rules of procedure governing its procedures and operations. The Zoning Board of Appeals is made up of nine residents of Pompano Beach who volunteer their time and efforts to assist the City and its residents in the administration of the Zoning Code. Of the nine members, six are regular voting members and three members are alternates who may serve as a substitute for a regular voting member who is temporarily absent or disqualified. Each regular member has been appointed by the Mayor, a City Commissioner, or the City Commission as a whole and serves a term which runs concurrently with the term of the member of the City Commission who appointed them. Alternate members serve a three-year, concurrent term. Both regular and alternate members serve without compensation. Regular voting members and alternate members shall continue to serve until their successors are appointed.” (Rules of Procedure, City of Pompano Beach Zoning Board of Appeals, accessed June 1, 2020).

Beyond Planning and Zoning, the City of Pompano Beach must also form an Affordable Housing Advisory Committee (AHAC) as a requirement of receiving state of Florida State Housing Initiatives Partnership Program (SHIP) funding. The AHAC is meant to review policies and procedures within the local government and recommend actions to encourage affordable housing in the community. The composition of the AHAC is mandated by state statute by a list of citizen/elected official categories. Of particular interest to the interests of fair housing advocates is the category for a “citizen who is actively engaged as a not-for-profit provider of affordable housing,” and a “citizen who is residing within the jurisdiction of the local governing body making the appointments.” Either of these categories represent a prime opportunity to intentionally incorporate diversity, minority representation, and protected class status individuals on the AHAC. A review of the City of Pompano Beach's AHAC composition did not identify concerns and at the time of publication of this report, the City's AHAC was operating according to regulatory requirements.

Building Codes (Accessibility)

An important way that state and local governments impact fair housing choice for persons with disabilities is through the building and construction codes adopted and enforced in their jurisdictions. While federal housing discrimination laws impose design and building accessibility standards for certain housing and public facilities, Congress and HUD place the direct responsibility of meeting those federal standards on the architects/designers, builders, and operators of the covered accommodations, and do not require or authorize local government authorities to interpret or enforce federal accessibility requirements. There is no plan review or permitting process under the FHA or Americans with Disabilities Act (ADA). Indeed,

under these laws, a building permit or certificate of occupancy from a local government does not shield a builder from enforcement action by HUD or the DOJ or from liability in a private civil action. Rather, local building departments and inspectors only enforce state and local accessibility codes or laws. However, by incorporating the federal standards into the state and local codes, state and local governments can ensure another level of oversight and protection of the unique housing needs faced by persons with disabilities.

All construction in the City of Pompano Beach shall be in accordance with the Florida Building Code, Florida Fire Prevention Code, and the 2015 International Property Maintenance Code as amended. The Florida Building Code includes the primary guidance containing scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements. The 1993 Florida Legislature enacted the "Florida Americans with Disability Accessibility Implementation Act" which incorporated the architectural accessibility requirements of the Americans with Disabilities Act of 1990 into Florida law and maintained existing provisions of Florida law thought to be more stringent than the ADA accessibility guidelines. In 1997 the legislature amended the Act to address U.S. Department of Justice (DOJ) concerns with Florida requirements, which might not have been equivalent or more stringent than ADA architectural standards, to obtain federal certification of Florida's building code as substantially equivalent to the Federal ADA Standards for Accessible Design as adopted by the Department of Justice (DOJ) in 28 CFR 36.

As a recipient of federal funds, Pompano Beach is obligated to comply with the Fair Housing Act (FHA) and the Fair Housing Amendments Act, which expanded the FHA and established terms to enforce harsher penalties for those who sell or rent property and discriminate against persons with disabilities. Multifamily housing units covered by the FHA's accessibility requirements are those located in a building of four or more units, built for first occupancy after March 13, 1991, and includes both privately owned and publicly assisted housing rental units and for sale units. It includes not just apartments and condominiums but also assisted living facilities, continuing care facilities, nursing homes, public housing developments, HOPE VI projects, projects funded with HOME or other federal funds, transitional housing, single room occupancy units (SROs), shelters designed as a residence for homeless persons, dormitories, hospices, extended stay or residential hotels, and more. When an addition is built onto an existing building, the addition of four or more units is regarded as a new building and must meet the design requirements. If any new public and common use spaces are added, they are required to be accessible. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements.

Pompano Beach is obligated to comply with additional laws due to receipt of federal assistance including Section 504 of the Rehabilitation Act of 1973 (which applies to programs and activities receiving federal funds), Titles II and III of the Americans with Disabilities Act (ADA) (which apply to programs, services, and activities provided or made available by public entities and to public accommodations, respectively), and the Architectural Barriers Act (which applies to federal facilities). Any housing (including single family

detached homes) constructed by federal, state, or local government entities or constructed using federal funds may be subject to accessibility requirements under these laws.

Housing funded by HUD also must meet the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. Under the UFAS, all federally assisted new construction housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

Private Sector – Lending Policies and Practices

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by census tract, City, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

The following analysis is provided for the City of Pompano Beach summarizing 2017 HMDA data and data between 2007 and 2017 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of

the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2017 City Overview

In 2017, there were approximately 4,500 applications within Pompano Beach for home loans to purchase, refinance, or make home improvements for a single-family home - not including manufactured homes. Of those applications, over 2,100 or 46% were approved and originated. This represents a 1% increase compared to 2016, higher than the national decrease of 13 percent. Of the remaining 2,448 applications, approximately 800 or 18% of all applications were denied. The top two application denial reasons within the City were debt-to-income ratio (28%) and credit history (23%), representing over half of the City's total denials. Lack of collateral and incomplete applications represented 21% and 12% of denials, respectively. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the 1,650 applications, that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in some instances the application may have been withdrawn by the applicant.

Disposition of Application by Loan Type and Purpose, 2017 Single Family Homes (excluding manufactured homes)				
	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	1,894	1,201	280
	FHA	673	229	14
	VA	147	113	9
Loans Originated				
	Conventional	1,065	476	90
	FHA	287	72	8
	VA	70	41	3
Loans Approved but Not Accepted				
	Conventional	39	34	7
	FHA	16	8	0
	VA	1	8	0
Applications Denied				
	Conventional	226	281	125
	FHA	87	44	4
	VA	14	14	3
Applications Withdrawn				
	Conventional	229	228	31

	FHA	69	48	0
	VA	22	21	1
Files Closed for Incompleteness				
	Conventional	42	103	18
	FHA	12	32	0
	VA	1	15	1
Source: 2017 HMDA				

Table 54. Disposition of HMDA applications by Loan Type and Purpose.

A further examination of the 798 denials within Pompano Beach during 2017 indicates that approximately 40% were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences, while 38% were for home purchases. The top denial reason for home purchases was lack of collateral at approximately one-third, while debt-to-income ratio was the top denial reason for refinances at 29%. Refinance applications were more likely to be denied for credit history compared to home purchases, while home purchase applications were more likely to be denied for lack of collateral. The share of refinance applications denied for lack of collateral was approximately 19%.

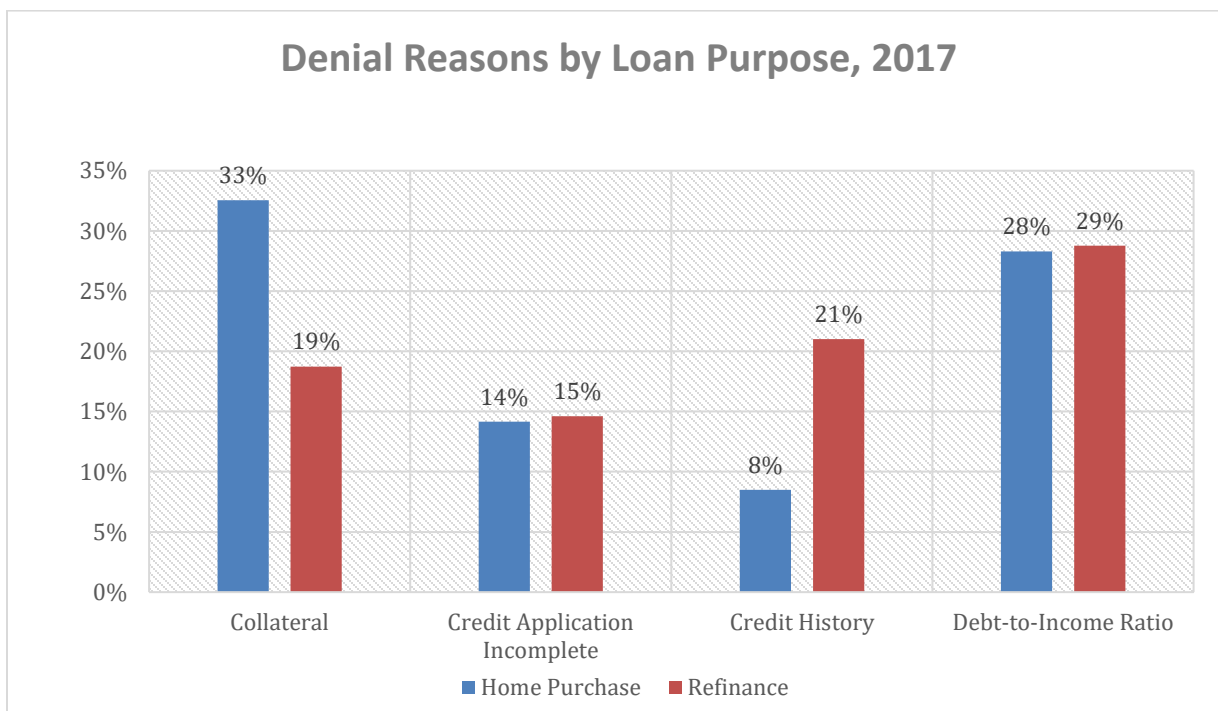


Figure 34. HMDA loan denial reasons by loan purpose.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data

Typically, homeowners seeking to refinance their existing home mortgage can use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this could indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown below, the percentage of refinance denials given for the reason of lack of collateral has declined since the peak of the housing crisis, from a high of 49% in 2009 to approximately 19% in

2017. This downward trend suggests that the number of “under-water” homes in Pompano Beach has declined since 2009.

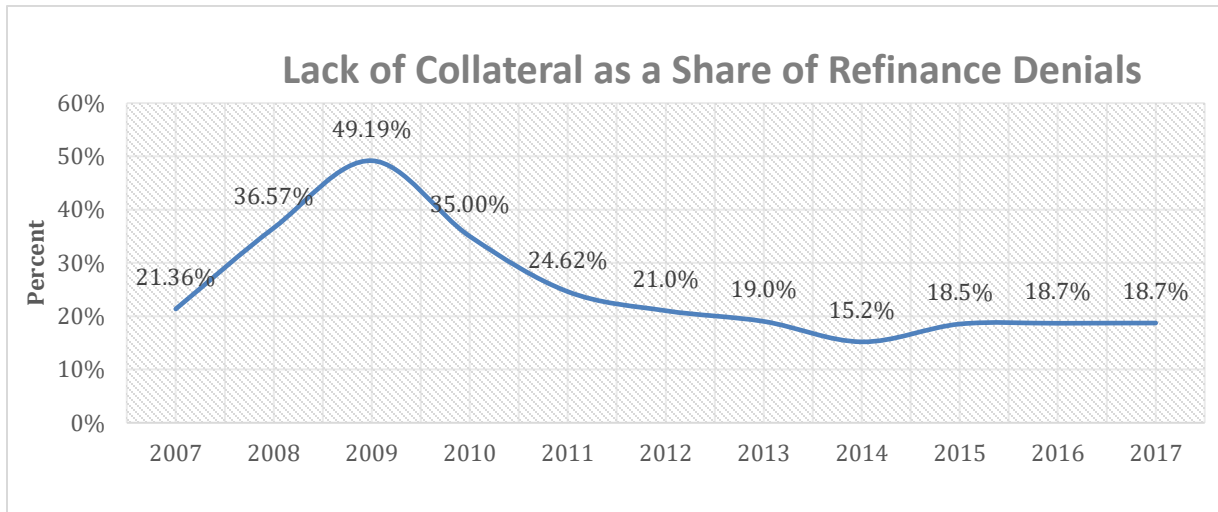


Figure 35. Lack of collateral as a share of refinance denials.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Home Purchase Lending in Pompano Beach

Of the home purchase loans for single family homes that were originated in 2017 (1,422 loans originated), approximately 75 percent of these originations were provided by conventional lenders, higher than the national conventional home purchase share of 64 percent. The remaining 25 percent of home purchase loans in Pompano Beach were provided by federally-backed sources including the Department of Veterans Affairs (VA) at 20 percent of all home purchase originations, and the Federal Housing Administration (FHA) at 5 percent. Nonconventional loans, including the FHA and VA lending programs, have relatively lower down-payment requirements in comparison to conventional lenders. The FHA and VA lenders also have lower approval rates compared to conventional lenders.

	<i>Originations</i>	<i>Share of Total</i>	<i>Approval Rate</i>
Conventional	1,078	74.9%	56.1%
FHA	287	20.2%	42.6%
VA	70	4.9%	47.6%
Total	1,422		
<i>Source</i>	FFIEC 2017 Home Mortgage Disclosure Act Data		

Table 55. HMDA loan home purchases by type.

The share of applications and percentage of loan application denials for traditional home purchase loans

in Pompano Beach varies by race/ethnic groups. The majority of applicants in 2017 were non-Hispanic Whites at 62%, followed by Hispanics at 21%. Black applicants represented 13% of all home purchase applications while Asian applicants represented 2%.

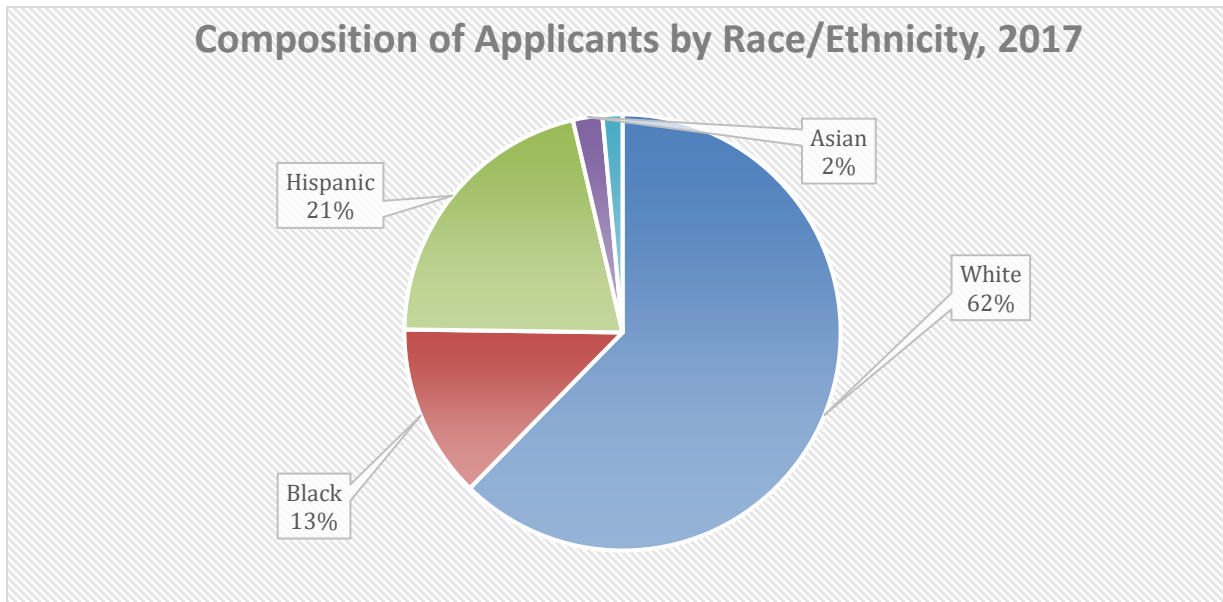


Figure 36. Composition of applicants by race/ethnicity.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

In 2017, Asians were least likely to be denied for conventional single-family home purchases, being denied at a rate of 10%, followed closely by Whites at 12%. Hispanics were denied at a rate of 16%, while Black applicants faced the highest conventional home purchase denial rate at 17%. Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Pompano Beach, shown below, demonstrates that high-income applicants (having greater than 120% of Area Median Income) were less likely to be denied for a single family home purchase than Low Income applicants (having less than 80% of Area Media Income) across all race/ethnicity groups. Additionally, Low Income Hispanics were the group with the highest home purchase denial rate at 22%. High income Hispanics were denied at a rate of 8%, the lowest of all groups examined and nearly three times less the rate of low-income Hispanic applicants.

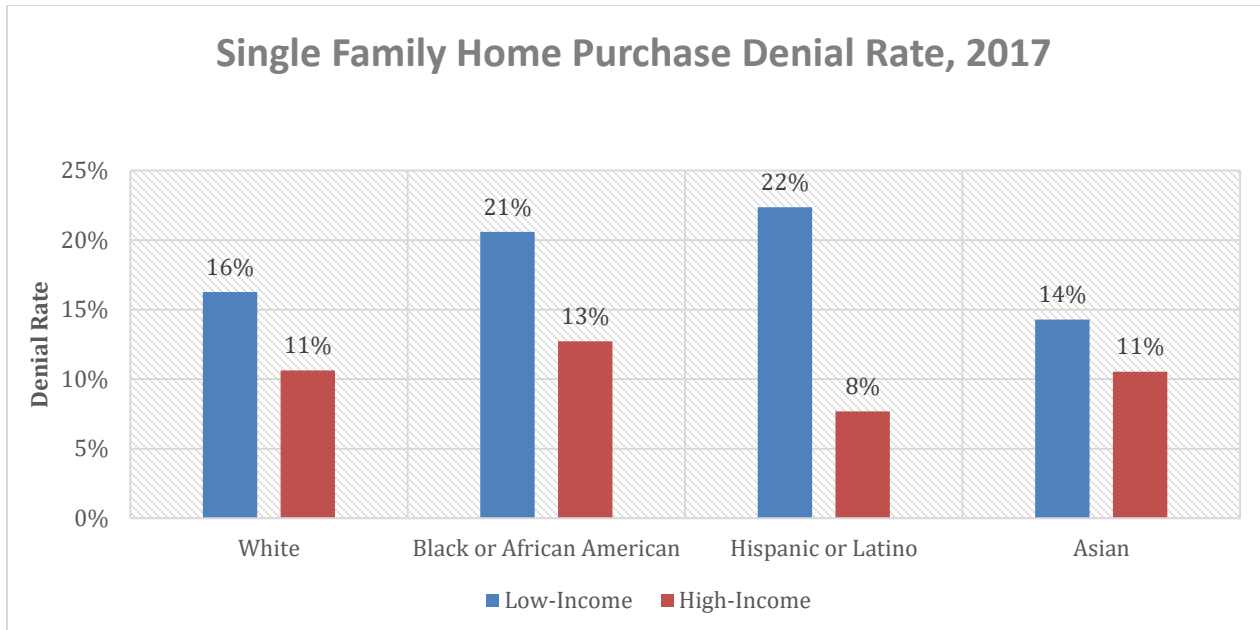


Figure 37. HMDA loan single Family Home purchase denial rate

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Application Denial Reasons by Income Group

The below charts compare denial reasons among White and Hispanic applicants in Pompano Beach for 2017 by income group. Black and Asian applicants have been excluded due to lack of sample size.

As of 2017, the leading denial reason for High income White and Hispanic applicants was lack of collateral. High income Hispanics had a higher share of denials for incomplete applications, while High income Whites had a higher share for debt-to-income ratio.

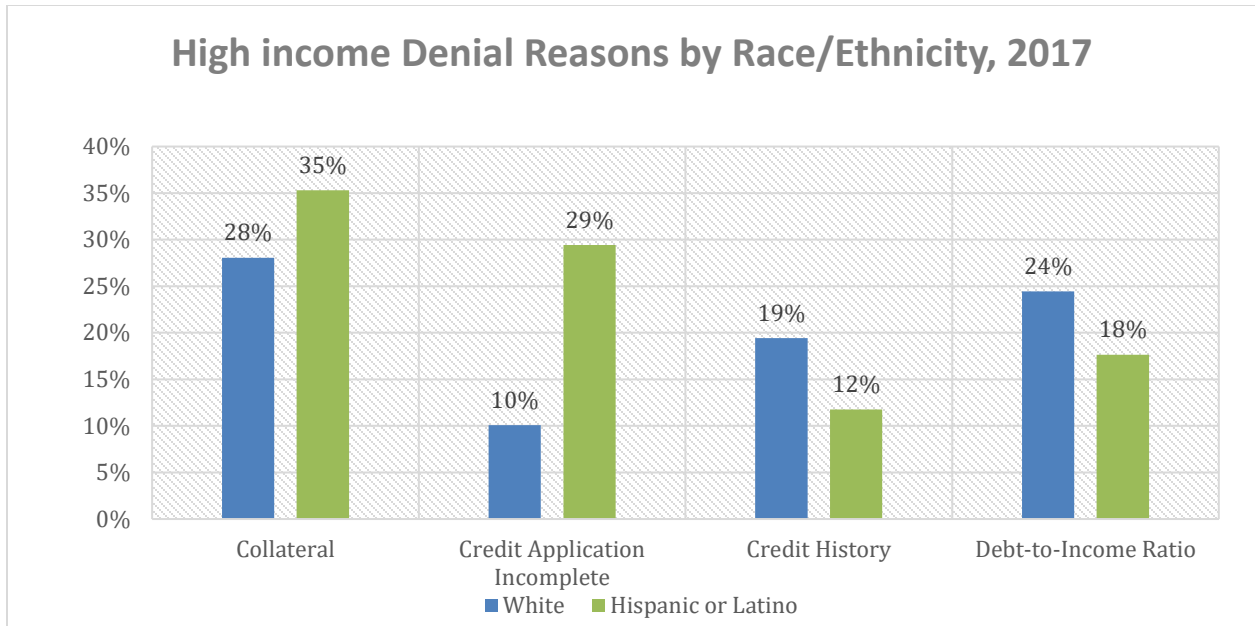


Figure 38. HMDA loan high income denial reasons by race/ethnicity.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

For low income denials, the top reason for both groups was debt-to-income ratio, at over 40 percent. Both Low Income groups were denied for debt-to-income ratio at a higher rate than their high-income counterparts. In the case of Hispanic, the difference relative to high income applicants was more than double. Additionally, low income applicants in both groups were less likely to be denied due to lack of collateral or incomplete applications relative to high income applicants.

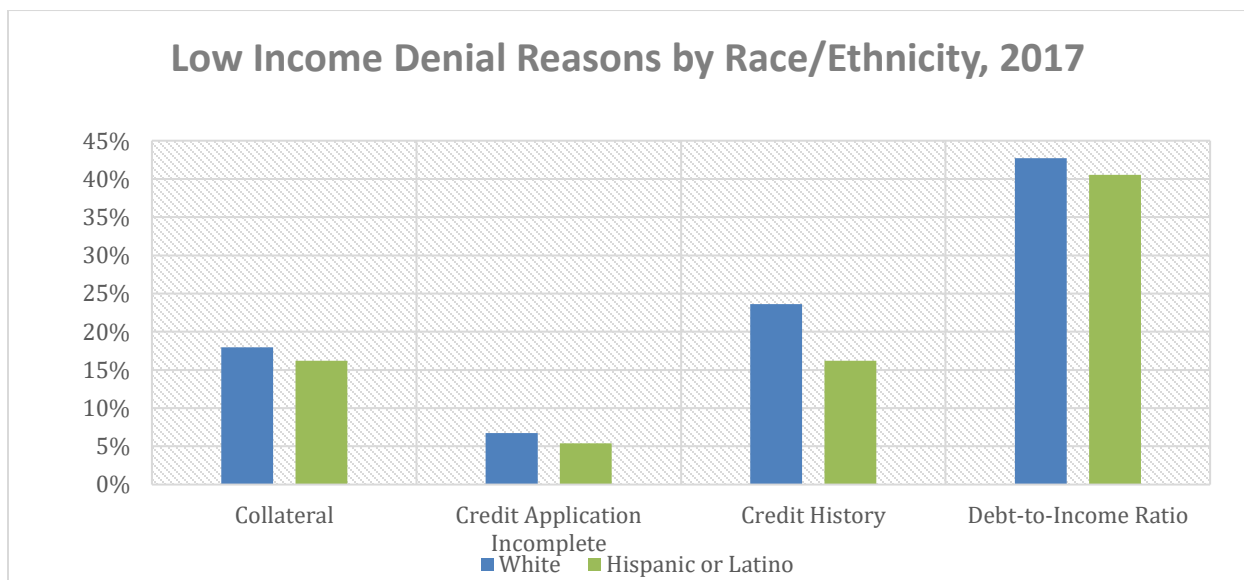


Figure 39. HMDA loan low-income denial reasons by race/ethnicity.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Pompano Beach's Single-Family Lending Market, 2007-2017

The following section will examine HMDA data over the between 2007 and 2017 for Pompano Beach.

Highlighted below, the number of single-family loan originations in Pompano Beach followed a dynamic trajectory between 2007 and 2017. At the onset of the housing crisis, originations declined by two-thirds between 2007 and 2008, followed by a milder but steady decline between 2008 and 2011. Subsequently, originations experienced a significant year-over-year increase of over 300 percent between 2011 and 2012, growing by over 1,400. Loan originations then fell by approximately 20 percent between 2012 and 2014, though grew steadily between 2014 and 2016 before stabilizing in 2017. As of 2017, total originations in Pompano Beach are about 95 percent of the level prior to the housing crisis.

The number of application denials within Pompano Beach demonstrated less extreme changes between 2007 and 2017, though followed a similar trajectory. As of the most recent data year, denials are 58 percent below the level experienced in 2007. Relatedly, the share of denials as a percent of total originations and total denials has declined markedly since the housing bust, from 54 percent in 2008 to approximately 27 percent as of 2017.

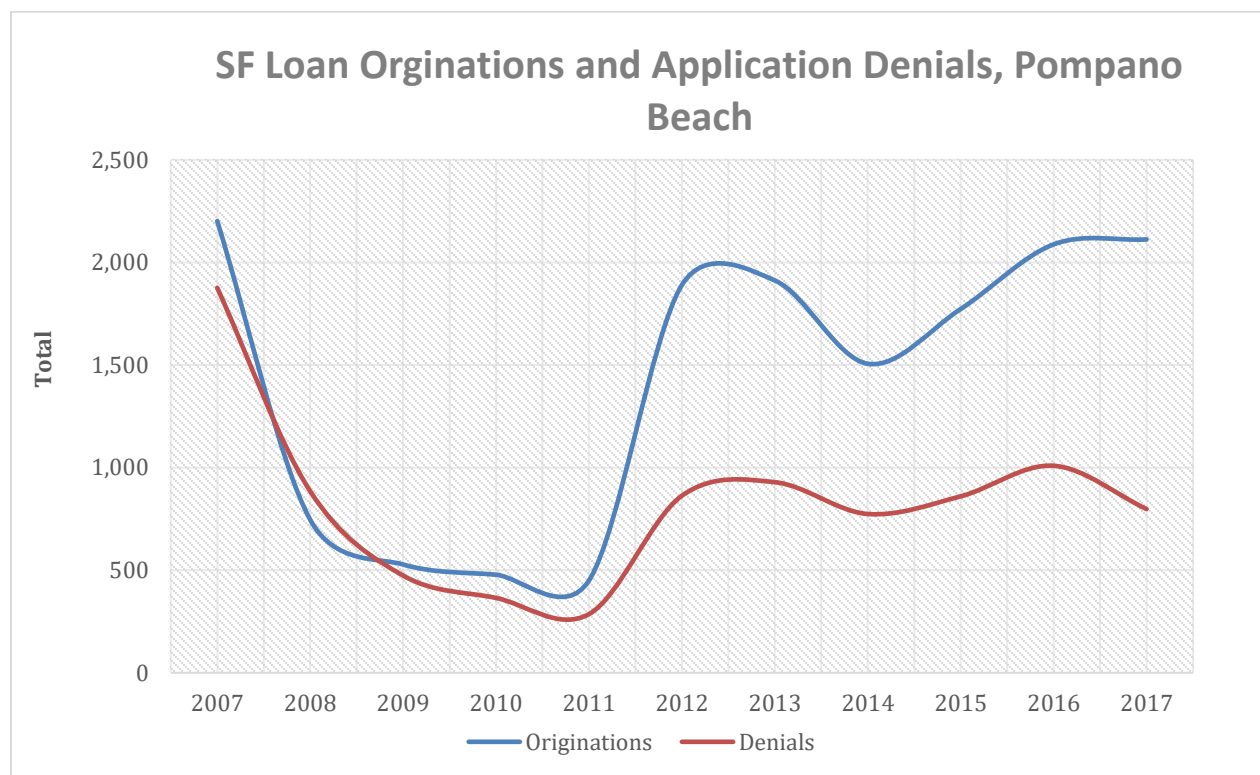


Figure 40. HMDA single-family loan originations and application denials, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2017 were the result of refinancing originations. Refinances were the top loan purpose in 2007 and 2008, the home purchases became the dominant loan purpose between 2009 and 2011. In 2012, as interest

rates were broadly falling, discussed further below, refinances were the most prevalent home purchase by far, at nearly two-thirds of the City’s total. In 2014, home purchase surpassed refinances as the top loan purpose and as of 2017 home purchases comprised 67 percent of the City’s total originations. The 1,422 home purchase loans originated in 2017 is the highest annual total of all years examined and the growth of home purchase originations since 2011 (over 500 percent growth rate between 2010 and 2017) reflects a steady and recovering demand for housing within the City.

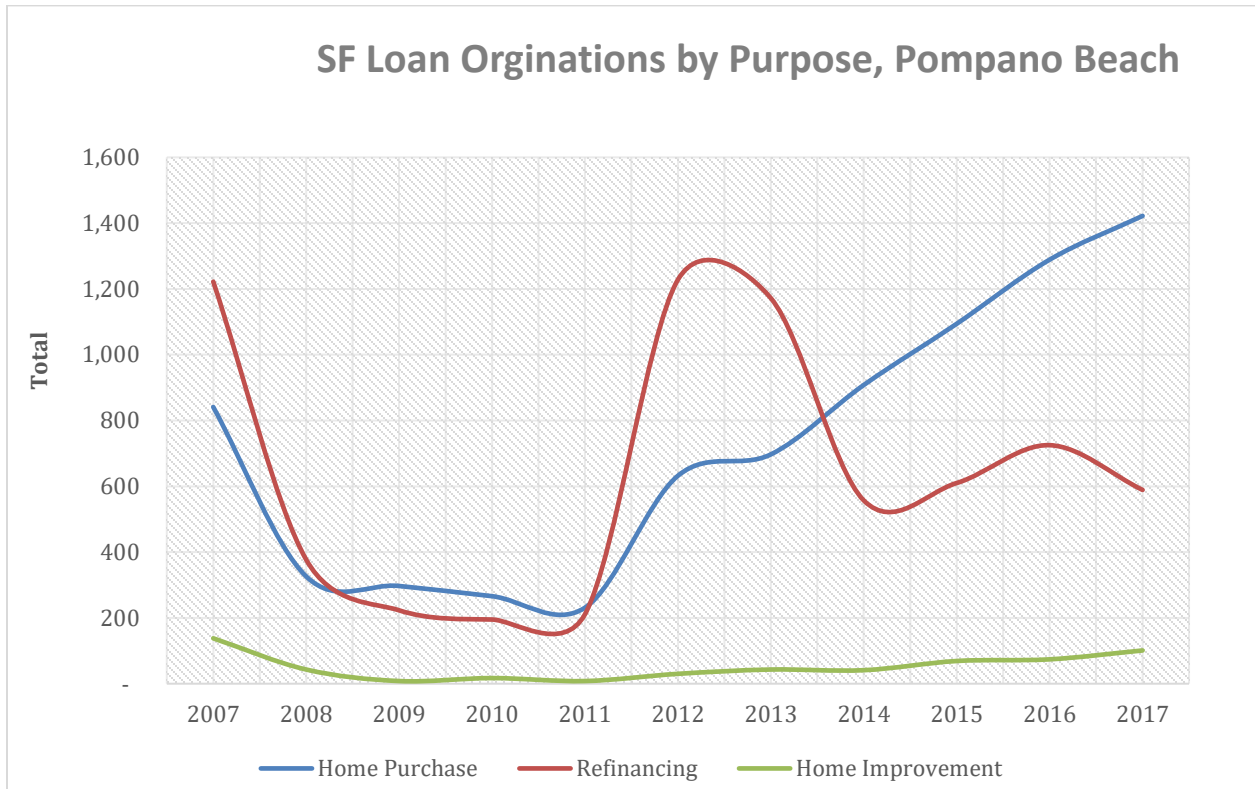


Figure 41. HMDA single-family loan originations by purpose, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

The share of refinance originations in Pompano Beach appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest level in both absolute number and percentage terms of all data years analyzed. Similarly, when interest rates rose between 2012 and 2014, the share of refinance originations fell from 65 percent to 37 percent. The increase in the annual average of the 30-year fixed mortgage rate between 2016 and 2017 is consistent with Pompano Beach’s 19 percent reduction in the number of refinance loan originations over the same time period.

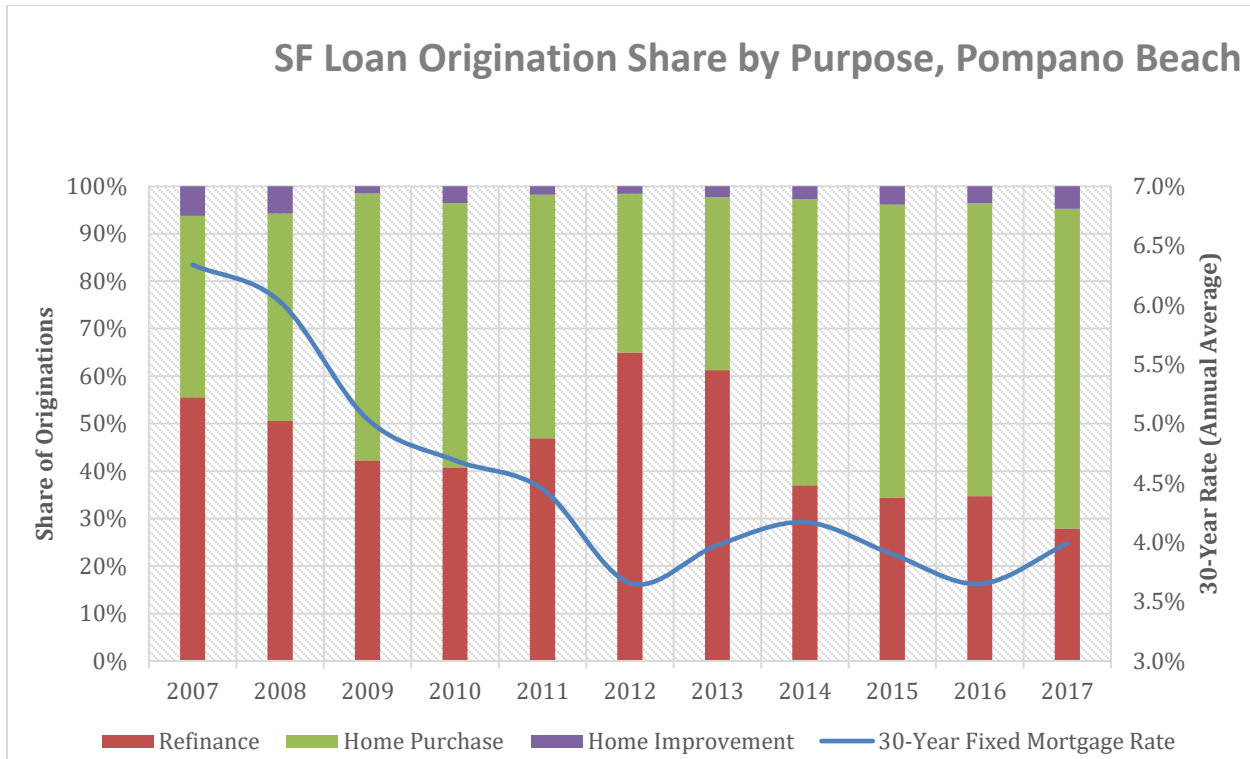


Figure 42. HMDA single-family loan origination share by purpose and 30-year average, City of Pompano Beach

Source: FFIEC 2017 Home Mortgage Disclosure Act Data; Federal Reserve Bank of St. Louis.

Income, Race, and Single-Family Loan Denials in Pompano Beach

Denial rates for single family loans in Pompano Beach over time vary by race and ethnicity. The chart below shows that between 2007 and 2017, White applicants were the least likely to be denied relative to Hispanics and Blacks for every year examined (Asians were excluded due to lack of sample size). During the same time period, Black applicants were the most likely to be denied relative to other groups. The overall denial rate for all groups has fallen during the analysis period.

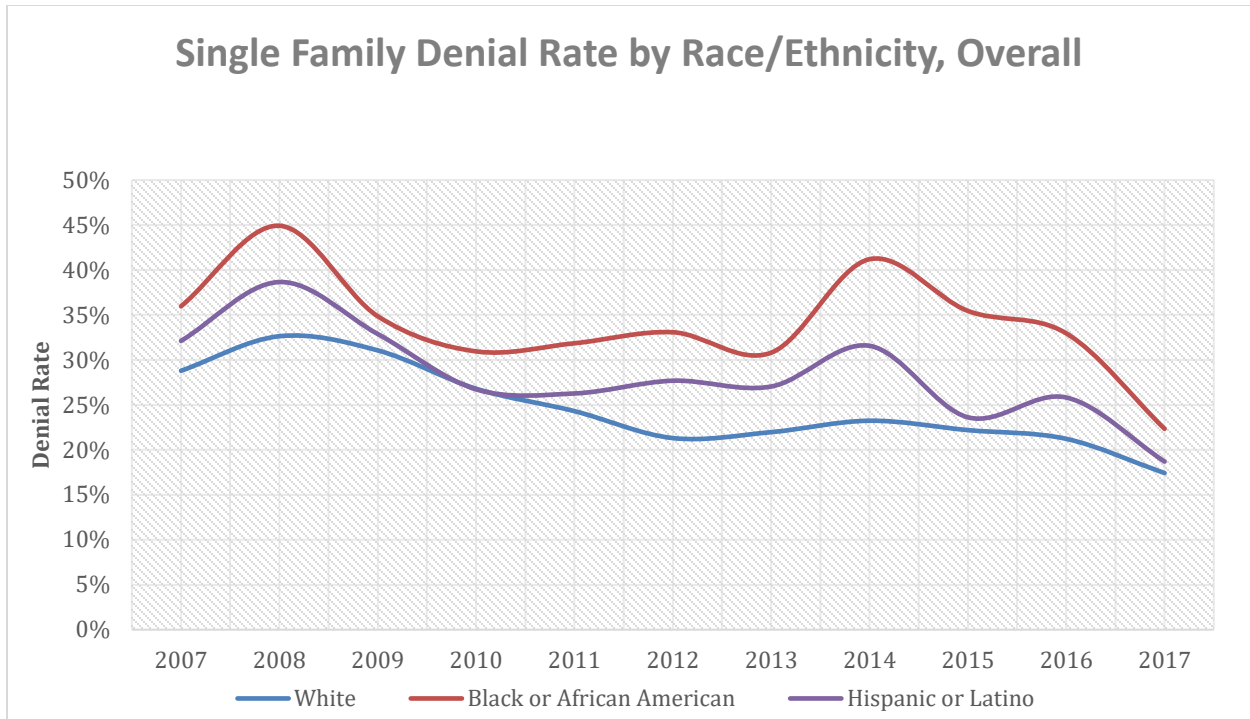


Figure 43. HMDA single family denial rate by race/ethnicity overall, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

A view of single-family denial rates by applicant income group within Pompano Beach, highlighted below, generally shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups, particularly in recent years. However, very low-income applicants (50 percent of less of Area Median Income) have remained well above other income groups since 2012, despite a decrease between 2016 and 2017. As of 2017, high income (greater than 120 percent of Area Median Income) and Middle Income (80 to 120 percent of Area Median Income) applicants are the lowest and second-lowest denied groups respectively, with Low Income (between 50 percent and 80 percent of Area Median Income) the third-lowest. The single-family denial rate declined for all income groups between 2007 and 2017.

SF Denial Rate by Applicant Income Group, Overall

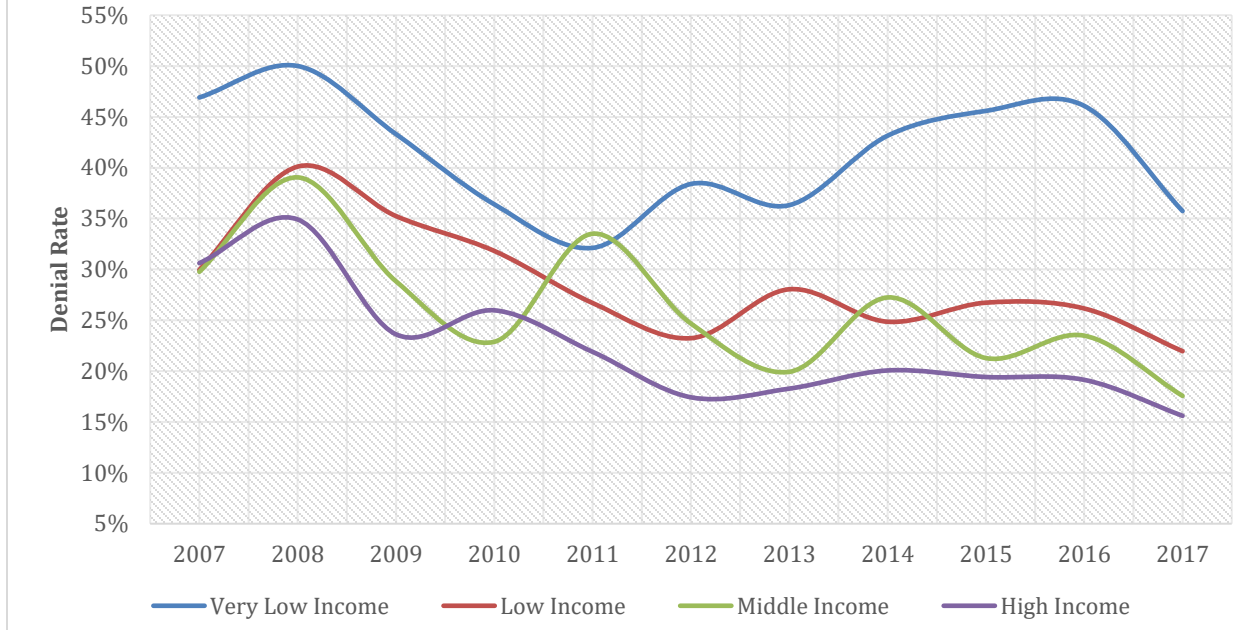


Figure 44. HMDA single family loan denial rate by applicant income group overall, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

As a percentage of total applications within Pompano Beach, the distribution among neighborhoods by income group (defined as median income of property’s census tract) shows that for every year examined, Middle Income neighborhoods represented the highest share of applicants (39 percent as of 2017).

Application Share by Neighborhood Income Group

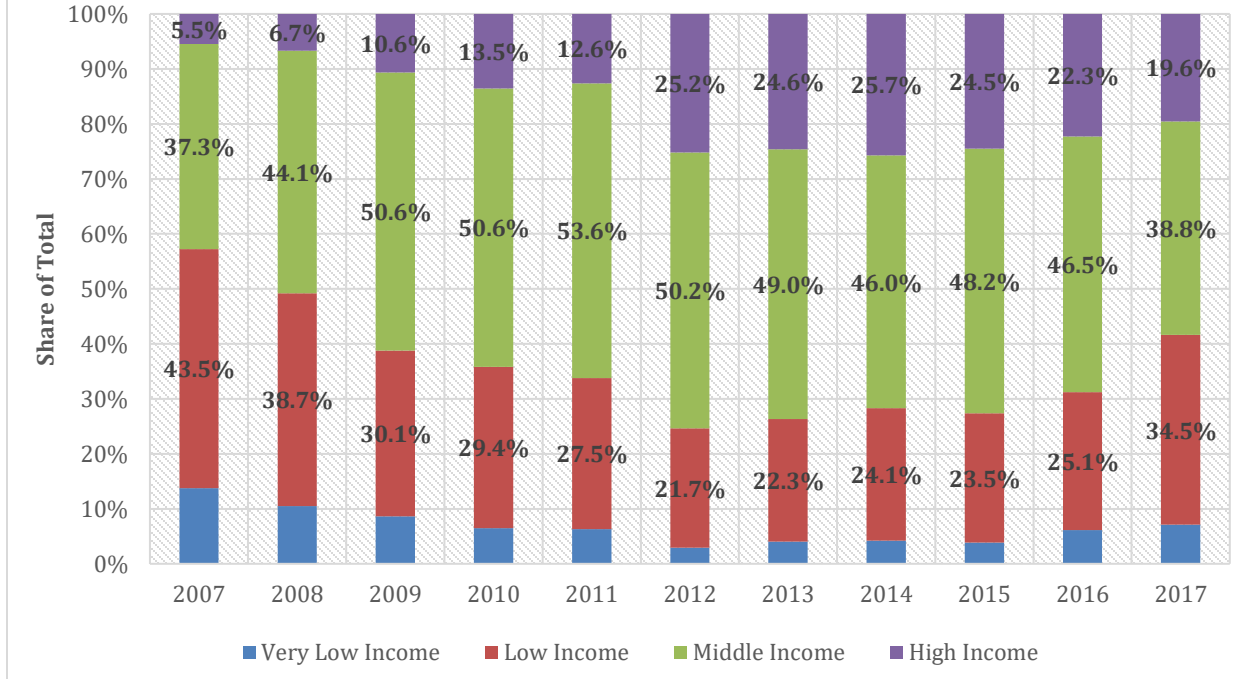


Figure 45. HMDA loan application share by neighborhood income group, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Within Pompano Beach, very low-income neighborhoods represent 15% of the City’s total neighborhoods, although they are represented by approximately 6% of total originations and 7% of total applications as of 2017, shown below. This suggests that very low-income neighborhoods within the City are less likely to participate in the single-family lending market relative to other neighborhoods. By contrast, loan applications and originations within Pompano Beach are disproportionately likely to occur for properties in Middle and particularly Low-Income neighborhoods.

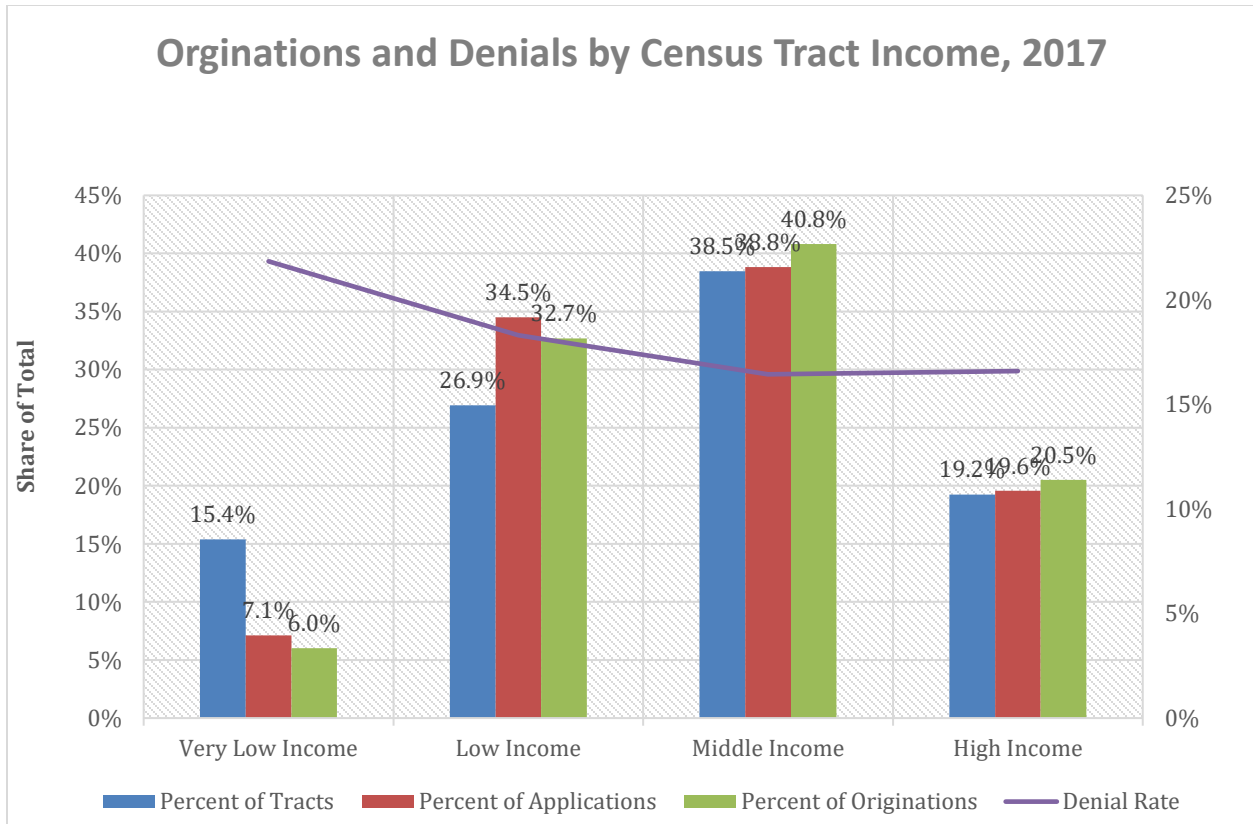


Figure 46. HMDA loan application originations and denials by census tract income.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

The Subprime Market

Illustrated below, the subprime mortgage market in Pompano Beach declined significantly between 2007 and 2008, dropping by 88% before bottoming out in 2011. However, subprime originations increased by more than 9 times between 2011 and 2017, to about 150 per year, which is approximately 23% of the 2007 total. Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5%. The total number of subprime loan originations decreased by approximately 77% on net between 2007 and 2017, while prime originations increased by 30% during the same period. As a percent of Pompano Beach’s total, subprime originations declined from 32% to 8% between 2007 and 2017.

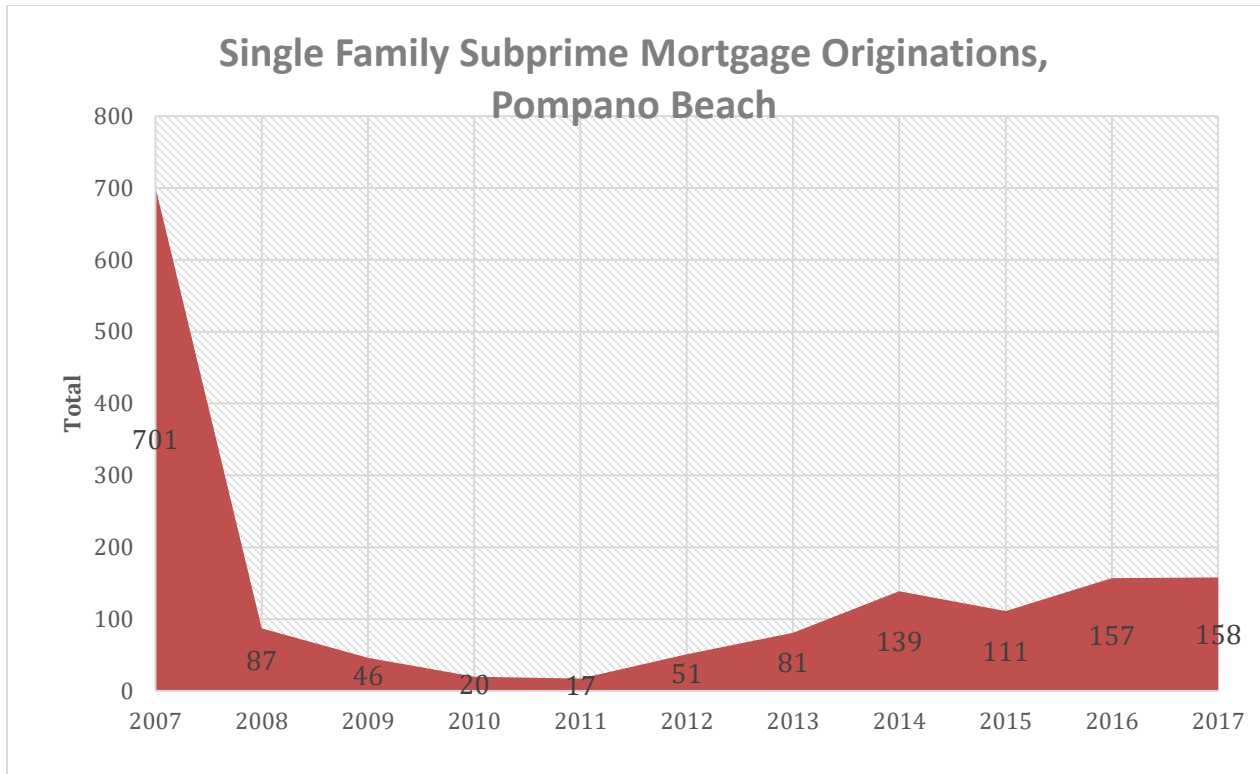


Figure 47. HMDA loan single family subprime mortgage originations, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

The share of subprime originations by race/ethnicity shows that Blacks and Hispanic originations were more likely to be subprime leading up to the housing crisis. Though subprime shares converged around 2010, Hispanics and particularly Blacks have experienced higher subprime shares relative to Whites in recent years. As of 2017, Blacks and Hispanics are more than twice as likely to have a subprime loan compared to Whites.

Suprime Share by Race/Ethnicity, Overall

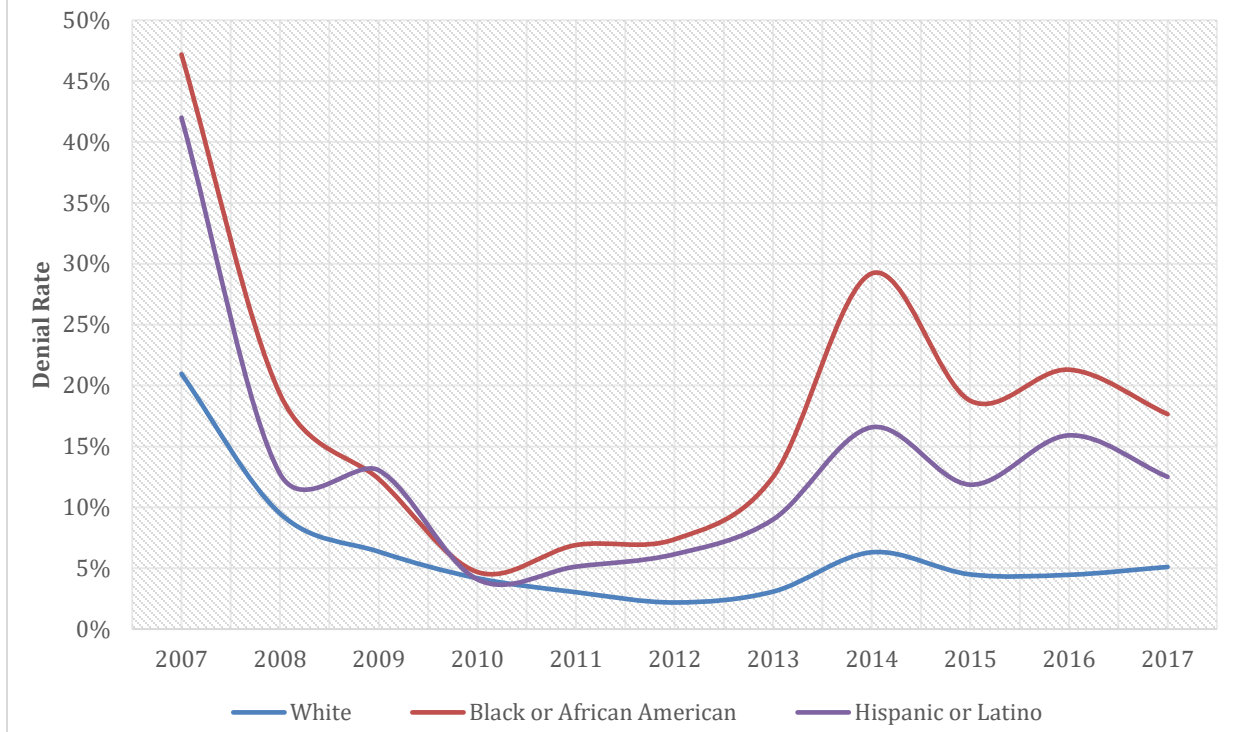


Figure 48. HMDA loan subprime share by race/ethnicity overall, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Consistent with broader national trends, the composition of subprime loans within Pompano Beach has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, 99.9% of subprime loans within the City were originated by conventional lenders. As of 2017, that percentage is 46%, up from a low of 27% in 2014. Of the nonconventional subprime loans originated in Pompano Beach, 100% are insured by the Federal Housing Administration. By contrast, the FHA’s share of nonconventional prime loans is 71%, while 29% are insured by the Department of Veterans Affairs.

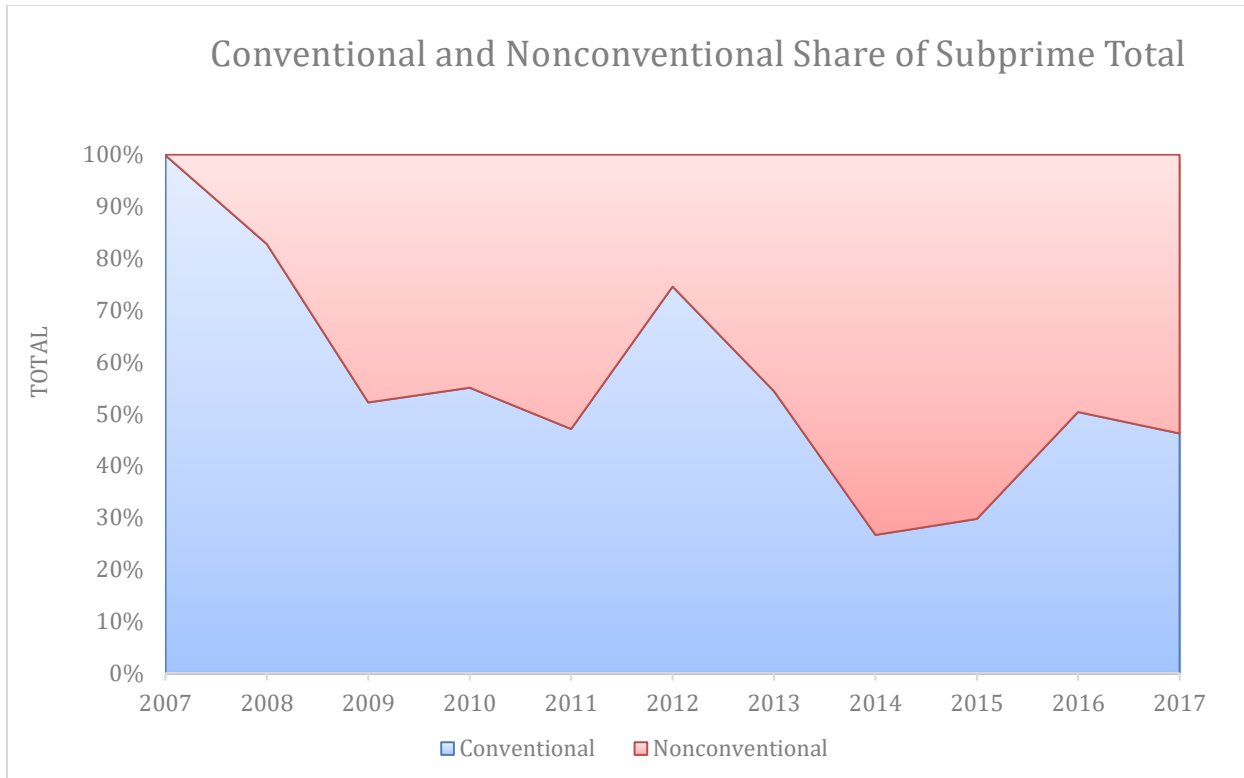


Figure 49. HMDA loan conventional and nonconventional share of subprime total, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

As a percentage of all subprime loan originations within Pompano Beach, home purchases represented 82% in 2017, up from its share of 27% in 2012.

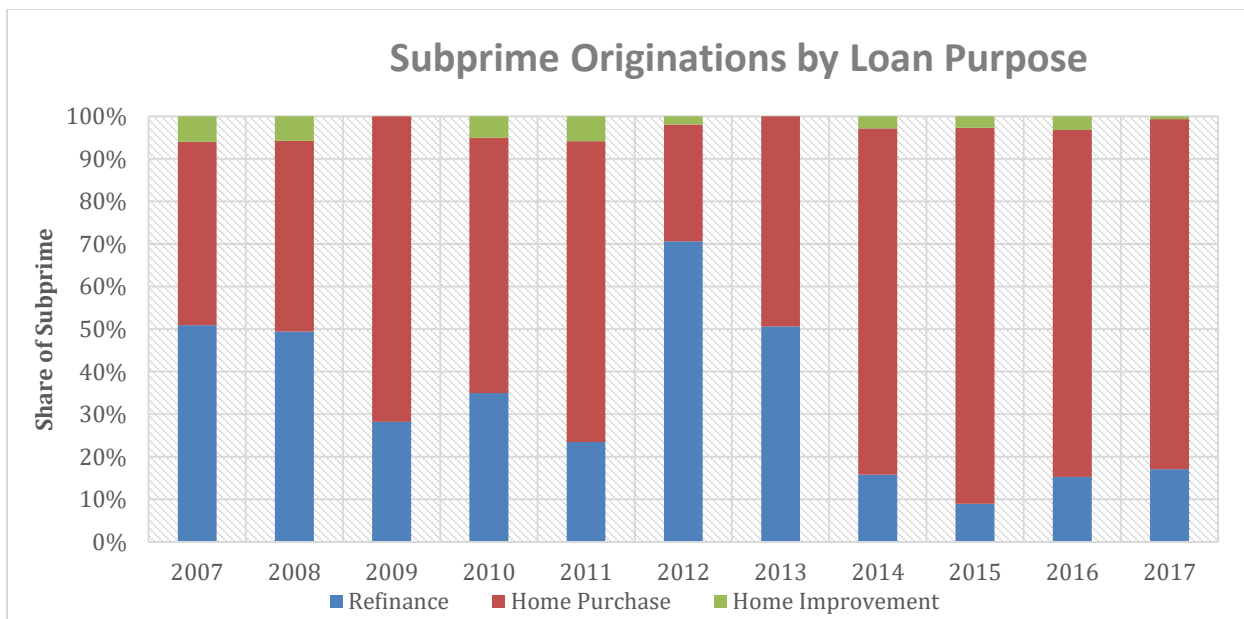


Figure 50. HMDA loan subprime originations by loan purpose.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Though three-quarters of all subprime loans within Pompano Beach in 2017 were nonconventional, a strong majority (77%) of all single-family originations in 2017 were from conventional lenders. The highest share of nonconventional originations for any loan purpose was for home purchase loans in 2009 at 42%. The share of conventional lending in Pompano Beach has hovered around the high 70% range in the last few years.

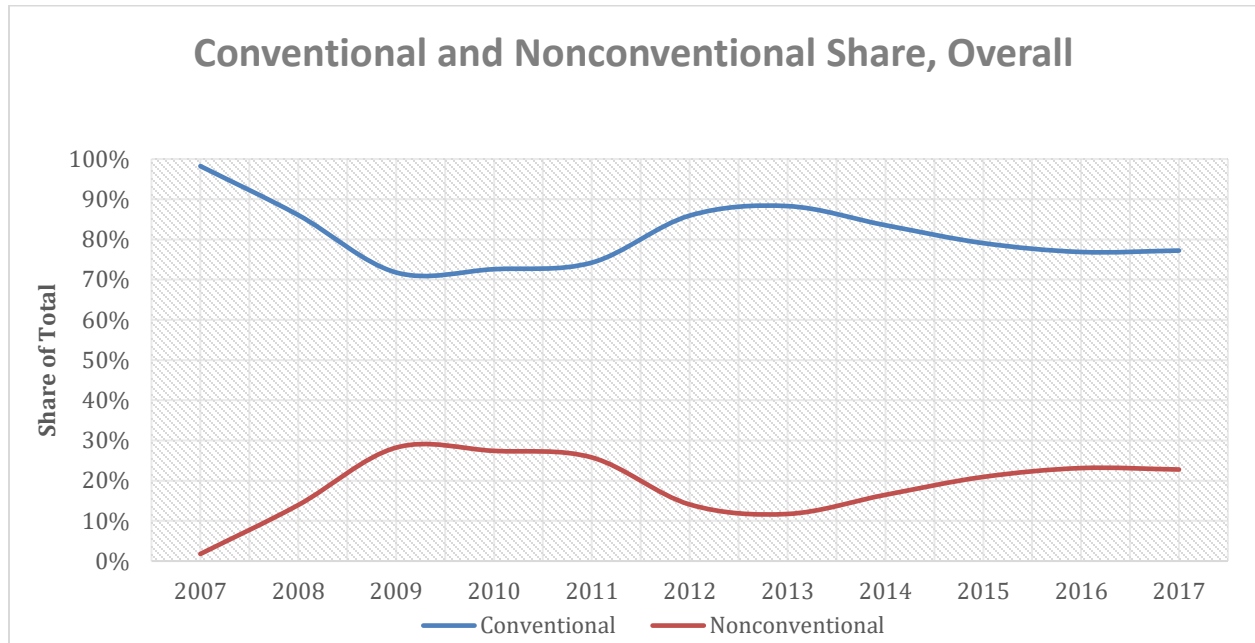


Figure 51. HMDA loan conventional versus nonconventional share overall, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

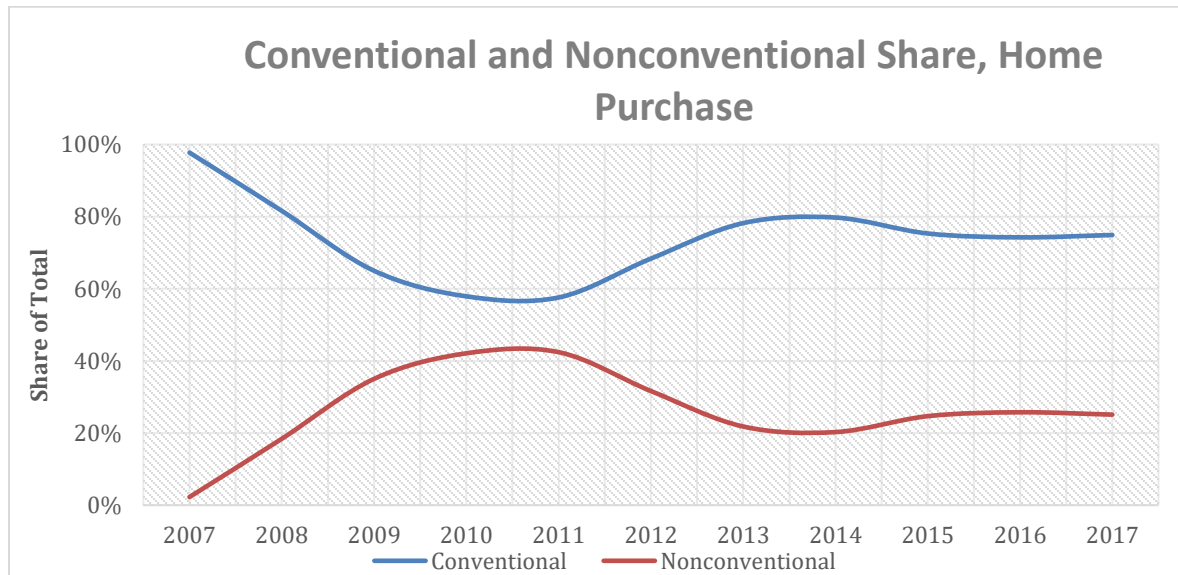


Figure 52. HMDA loan conventional versus nonconventional Home Purchase, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

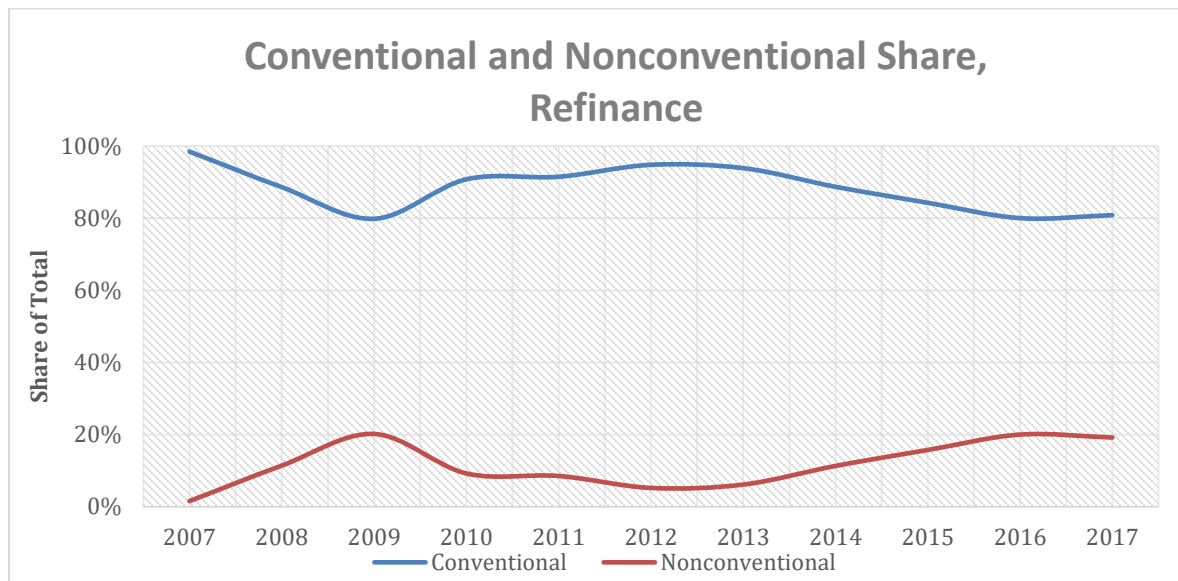


Figure 53. HMDA loan conventional versus nonconventional Refinance, City of Pompano Beach.

Source: FFIEC 2017 Home Mortgage Disclosure Act Data.

Private Lending Market Analysis Conclusion

Mortgage lending activity in Pompano Beach is consistent with many of the broader trends that have occurred in the wake of the housing crash, Great Recession, and subsequent economic recovery.

Further, Pompano Beach exhibits relatively strong mortgage market fundamentals. Home purchase originations have increased every year since 2011 and surpassed 2007 levels in 2014, suggesting signs of growing housing demand and a housing market recovery within the City. Additionally, the share of refinance applications denied for lack of collateral, suggesting an “under-water” home, has declined markedly since the peak of the housing crisis.

The City has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations and a subprime lending market that remains below its peak prior to the housing bust, despite increases since 2011. Government-insured mortgages have increased in the subprime market, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Black/African American and Hispanic applicants relative to White applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

Public and Private Sector

Fair Housing Enforcement

The federal FHA prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. The U.S. Department of Justice (DOJ) and HUD are jointly responsible for enforcing the FHA. Two HUD programs are dedicated to the enforcement of the Fair Housing Act: Fair Housing Assistance Program (FHAP) and Fair Housing Initiatives Program (FHIP). HUD's Office of Fair Housing and Equal Opportunity (FHEO) is responsible for administering FHIP, FHAP, and HUD's investigation of fair housing and fair lending complaints. The Civil Rights Division of the U.S. Department of Justice (DOJ) may also investigate complaints.

The State of Florida and the City of Pompano Beach have also adopted fair housing laws. HUD has determined that the Florida Fair Housing Act (FFHA) is substantially equivalent to the federal Fair Housing Act meaning that the state law covers the protected classes in the Fair Housing Act. State or local law may also provide additional protected classes as is the case in Florida where it is unlawful to discriminate in land use decisions or in the permitting of developments based on protected characteristics, or, based on the source of financing of a development or proposed development. The FFHA also protects persons who are pregnant or in the process of becoming legal custodians of children 18 years of age or younger, or persons who are themselves handicapped or associated with a handicapped person.

The Broward County fair housing ordinance (Broward County code of ordinances, Chapter 16, Article 3, Division 3, Discrimination in Real Estate Transactions) offers protections to additional protected classes. The Broward County ordinance protects all of the following classes: race, color, religion, sex, national origin, age, disability, marital status, political affiliation, sexual orientation, pregnancy, or gender identity or expression.

State and local government agencies certified by HUD to enforce state or local fair housing laws that are substantially equivalent to the Fair Housing Act receive FHAP funds. HUD provides funding to the Florida Commission on Human Relations (FCHR), the agency charged with enforcing the state's civil rights laws, including the FFHA. Through annual work share agreements FCHR receives and investigates housing discrimination complaints referred by HUD. HUD provides FHAP funding for processing dual-filed complaints, training, provision of technical assistance, the creation and maintenance of data information systems, and the development and enhancement of education and outreach projects, special enforcement efforts, partnership initiatives, and other fair housing projects.

Legal services organizations, typically mission-based nonprofits, offer free or low-cost services to clients based on a wide range of discrimination bases. In the City of Pompano Beach and neighboring region, the Legal Aid Service of Broward County (LASBC) and HOPE, Inc. provide representation and housing discrimination services to low-income and vulnerable individuals in civil matters, with eligibility typically based on income and assets of all members of the household. HOPE, Inc. offers a fair housing

discrimination hotline and can direct complainants to appropriate agencies based on details of the discrimination claim.

Complaint Process

Persons suspecting that they have been discriminated against can file a fair housing complaint at the federal, state, or local level by contacting HUD, DOJ, FCHR, LASBC, or HOPE, Inc. The chart below provides information on how residents can file a housing discrimination complaint with any of the fair housing enforcement organizations.

How to file a Housing Discrimination Complaint	
<p>To file a housing discrimination complaint with HUD:</p> <ul style="list-style-type: none"> • Place a toll-free call to 1-800-440-8091 or TTY 1-800-927-9275; • Complete the “on-line” complaint form available on the HUD website; • Submit a claim of housing discrimination on the HUD Complaint Mobile App; or • Mail a completed complaint form or letter to: Atlanta Regional Office of FHEO U.S. Department of Housing and Urban Development Five Points Plaza 40 Marietta Street, 16th Floor Atlanta, Georgia 30303-2806 	<p>To report an incident of housing discrimination to the DOJ, or to alert the DOJ of matters involving a pattern or practice of discrimination or matters involving denial of rights to groups of persons:</p> <ul style="list-style-type: none"> • Call the Fair Housing Tip Line at 1-800-896-7743; • Email fairhousing@usdoj.org; or • Mail a letter to: U.S. Department of Justice Civil Rights Division Housing and Civil Enforcement Section – G St. 950 Pennsylvania Avenue, N.W. Washington, DC 20530
<p>To file a complaint with FCHR, complainants must contact the agency within one year of the date on which the alleged act of discrimination occurred.</p> <ul style="list-style-type: none"> • Telephone 850-488-7082; or • Mail or fax the Technical Assistance Questionnaire for Housing Complaints to: Florida Commission on Human Relations Office of Customer Service 4075 Esplanade Way, Room 110 Tallahassee, FL 32399 Fax 850-487-1007 	<p>To file a complaint with the Legal Aid Service of Broward County, contact:</p> <ul style="list-style-type: none"> • Broward County Human Rights Section, Governmental Center 115 S. Andrews Avenue, Room 427 Fort Lauderdale, FL 33301 <p>Hotline: 1-800-669-9777 Telephone 954-357-6500 Fax: 954-357-7817</p>
<p>To report a housing discrimination to HOPE, Inc., keep a record of any meetings and phone calls with the housing provider, noting what happened and what was said and include specific information such as names, titles, meeting places, dates, and times. Save receipts, applications, business cards, leases, and any other documents obtained during the transaction.</p>	

- | | |
|---|--|
| <ul style="list-style-type: none">• Call: 954-567-0545 (Broward County) | |
|---|--|

Table 56. How to file a housing discrimination complaint, City of Pompano Beach.

If a complaint is filed with HUD under the federal Fair Housing Act and the complaint falls within the jurisdiction of FCHR, HUD must refer the complaint to the local or state agency and may take no further action, except under limited circumstances. Once the complaint is filed with FCHR, the process is as follows:

- A person alleging discrimination under the FFHA has one year after the discriminatory housing practice to file a complaint with FCHR.
- FCHR has 100 days after receiving the complaint to complete an investigation and issue a determination.
- FCHR can decide to resolve the complaint and eliminate or correct the alleged discriminatory housing practice through conciliation.
- If, within 180 days after a complaint is filed, FCHR has been unable to obtain voluntary compliance, the complainant may initiate civil action or petition for an administrative determination.
- If the commission finds reasonable cause, the claimant may request that the Attorney General bring the civil action against the respondent.
- A civil action must be commenced within two years after the alleged discriminatory act occurred.
- The court may continue a civil case if conciliation efforts by FCHR or by a local housing agency are likely to result in a satisfactory settlement.
- If the court finds that a discriminatory housing practice has occurred, the court must issue an order prohibiting the practice and providing administrative relief.
- Possible remedies include injunctions, restraining orders, fines and actual and punitive damages, court costs, and reasonable attorney's fees.

Information Programs and Community Outreach

The City of Pompano Beach endeavored to engage with public housing residents at the Pompano Beach Housing Authority, and with residents of the City, during the development of this AI. This outreach was accomplished primarily through public meetings for the Consolidated Plan and associated AI, engagement with nonprofits and area stakeholders regarding barriers to fair housing in the region, and publication of a survey to collect feedback from residents.

In addition to the City's intentional outreach for development of this AI, area fair housing agencies regularly conduct outreach and information programs. For instance, HOPE, Inc. offered two fair housing and predatory lending trainings for the Oasis of Hope, a 501c3 nonprofit located in the City and five trainings to the Urban League of Broward County in just the first quarter of 2020.

Based on findings in this AI, the City will continue to engage with landlords, tenants, and stakeholders in the area to promote fair housing, train on applicable laws, and offer best practices.

Visitability in Housing

Visitability is a voluntary standard endorsed by HUD to allow mobility impaired persons to visit families and friends where this would not otherwise be possible. Visitability means that 1) at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk, 2) the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space, and 3) at least a half bathroom on the main floor of the house. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features. Unlike accessibility, a visitable home does not require that all features of a dwelling unit be made accessible. The benefits of visitability include:

- An increase in the availability of housing options for individuals who may not require full accessibility;
- Providing property owners with assistance in making reasonable accommodations and reducing, in some cases, the need for structural modifications or transfers when individuals become disabled in place; and
- Improvement in the marketability of units.

The City of Pompano Beach has not developed a written visitability policy however, the City has adopted the Florida Building Code, which includes compliance with the 2012 Florida Accessibility Code for Building Construction adopted pursuant to Section 553.503, Florida Statutes. The Florida Housing Finance Corporation has also adopted Universal Design and Visitability Features in all state funded developments that involve new construction and rehabilitation of housing units.

The Florida Accessibility Code expands the requirements of the Fair Housing Act and the ADA standards by requiring that all new single-family houses, duplexes, triplexes, condominiums, and townhouses provide at least one bathroom with a door that has a 29-inch clear opening on each habitable grade level. This provision in the Florida Accessibility Codes promotes the concept of visitability and the City does make accessibility improvements in accordance with the building code and rehabilitation standards.

Assessment of Current Public/Private Fair Housing Programs and Activities

The City of Pompano Beach is committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through its HUD entitlement grant funding programs and the state's SHIP funding to assist in providing housing choice. Coordination with various state and local agencies has resulted in significant program and service diversity to assist in meeting housing needs throughout the City. The City will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

Current programs supporting fair housing efforts in the City include:

HUD Entitlement Funding

The City of Pompano Beach is entitled to the Community Development Block Grant (CDBG) and the HOME Investments Partnership Program (HOME) funding. These programs are versatile programs providing communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG is a primary funding source for the City in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the purpose of the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

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

This document serves as the City's updated AI in accordance with HUD regulation at 24 CFR 570.904(c)(1) for HUD entitlement grantees. The City is committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This AI coincides with the City's 2020-2025 Consolidated Plan, which includes the City's certification of compliance with fair housing requirements.

The City of Pompano Beach continues to further fair housing efforts through its HUD entitlement grant programs by funding activities including housing rehabilitation, neighborhood revitalization activities, and various public service activities. Grantees are committed to providing benefits to the greatest number of people while targeting low-and moderate-income residents, and 100% of funds went to low and moderate residents according to the 2017 - 2018 CDBG Community Development Block Grant Performance Profile.

The City utilizes its funding allocation in a strategic approach to alleviate poverty through various community development activities focused on neighborhood revitalization. Neighborhood infrastructure development that incorporates social design into physical improvements changes neighborhood landscapes and significantly improves the social connectedness of its residents. Community revitalization is essential to bolstering the health of a neighborhood and for providing housing choices in a suitable living environment connected to jobs, healthcare, and educational opportunities. These efforts all lower barriers to fair housing choice in Pompano Beach.

State Housing Initiatives Partnership Program

The State Housing Initiatives Partnership (SHIP) program, administered through the Florida Housing Finance Corporation (FHFC), has the primary objective of encouraging and creating partnerships that will assist in the production and preservation of affordable housing in the state of Florida. Funds must be used to benefit low-income and moderate-income persons. The SHIP program has required set-asides for funding that grantees must follow. A minimum of 65% of grant funds must be expended on eligible homeownership activities, a minimum of 75% is to be expended on eligible construction activities, at least 30% must be reserved for very-low income households, a minimum of 30% must be reserved for low-income households, and a minimum of 20% for households with special needs. The SHIP program funds affordable housing initiatives that support fair housing.

The City of Pompano Beach offers assistance through SHIP for purchase assistance, owner occupied rehabilitation, emergency rehabilitation, and rent assistance. These strategies are detailed in the City's Local Housing Assistance Plan (LHAP) in accordance with state requirements.

Conclusions and Impediments

In the Fair Housing Planning Guide, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices. In Pompano Beach, this extends to Broward County's expanded list of protected classes for discrimination based on age, victim of domestic violence, gender expression or identity, marital status, political affiliation, sexual orientation, source of income, and veteran status. Throughout this analysis various community issues have surfaced, both positive and negative. Some of these issues represent general community needs and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments.

In this section, impediments to fair housing choice are listed. Each impediment is associated with an "action plan," or set of specific actions to be conducted by the City of Pompano Beach and partner agencies over the next 5 years. By implementing the recommendations, the City of Pompano Beach will start to correct the identified impediments to fair housing choice.

The recommendations and actions listed in this section meet two critical criteria: they must be both meaningful and feasible. Actions must be meaningful in that they have a reasonable expectation of reducing barriers to fair housing choice. As well, actions must be feasible in that they are within the scope of the City of Pompano Beach's authority and within the scope of funding considerations.

Impediments and Action Plan

#	Impediment	Actions	Timeline	Intended Outcomes
1	<p>Lack of awareness by residents and landlords of fair housing laws, especially for Hispanics and foreign born.</p> <p>High number of fair housing complaints on the basis of disability.</p>	<ol style="list-style-type: none"> 1. Partner with a fair housing training/outreach organization by offering funding and programming support to provide fair housing training to landlords on fair housing laws specific to persons with a disability, foreign born and limited English proficient populations. 2. Provide fair housing trainings to the public and invited organizations, with special focus on the R/ECAP and census tracts with a large share of Hispanic and foreign-born residents. 3. Place flyers and fair housing information in public facilities. 4. Conduct targeted outreach and education to landlords in high opportunity/low poverty areas. 5. Advertise April Fair Housing Month and make public announcements regarding opportunities to learn about fair housing. 6. Include the HUD fair housing logo on all housing program related documents. 	2020 - 2024	<ol style="list-style-type: none"> 1. Improved public understanding of fair housing laws as measured by fair housing survey. 2. Lowered count of discrimination complaints on the basis of national origin. 3. Increased attendance at fair housing outreach and trainings. 4. Reduced count of discrimination complaints on the basis of disability.
2	<p>Insufficient supply of affordable rental and homeowner housing in high opportunity census tracts</p>	<ol style="list-style-type: none"> 1. Partner with a Community Land Trust and support its operations with quality City-owned surplus lands and unrestricted and restricted funds. 2. Once partnered, concentrate CLT investment in properties located in census tracts in the Eastern half of the City. 3. Execute on proposed Policy 03.01.08 in the Comprehensive Plan update (ADUs), and develop grant program for supporting development of 	2020 - 2024	<ol style="list-style-type: none"> 1. Increased count of affordable housing units developed in City of Pompano Beach across the City. 2. Increased count of permanently affordable single-family home parcels managed by CLT.

#	Impediment	Actions	Timeline	Intended Outcomes
		<p>ADUs in high opportunity neighborhoods on the Eastern half of the City.</p> <ol style="list-style-type: none"> 4. Coordinate annual review of FHFC RFAs and identify deployable City and private resources to ensure applications are submitted to relevant RFA opportunities. 5. Prioritize allocation of infrastructure improvement projects in R/ECAP and majority-minority census tracts. 6. Research establishing a mandatory inclusionary zoning ordinance in high opportunity neighborhoods undergoing significant redevelopment. 7. Implement a SHIP annual rental assistance strategy, in addition to rental assistance for households experiencing homelessness. 		<ol style="list-style-type: none"> 3. Creation of ADU policy and financial support for ADU development in high opportunity tracts. 4. Count of new FHFC-funded affordable units in City. 5. Increased funding for infrastructure and community development projects in R/ECAP and majority-minority census tracts. 6. Increased number of affordable units produced through inclusionary zoning ordinance.
3	<p>Low median household income, high poverty rate, high unemployment for Black/African American and Hispanic households relative to White and Asian households</p>	<ol style="list-style-type: none"> 1. Establish formal task force on economic opportunity for minority households with a focus on developing, implementing, and sustaining City initiatives focused on economic development and economic opportunity for Black/African American and Hispanic households. 	<p>2020 - 2024</p>	<ol style="list-style-type: none"> 1. Increased median household income for Black/African American and Hispanic households. 2. Lowered poverty rate for Black/African American and Hispanic households. 3. Lowered unemployment rates for Black/African American and Hispanic households.
4	<p>Concentration of housing vouchers in segregated and high poverty neighborhoods.</p>	<ol style="list-style-type: none"> 1. Conduct outreach and training to landlords in Pompano Beach on fair housing protections at the local level, especially on source of income discrimination. 	<p>2020 - 2024</p>	<ol style="list-style-type: none"> 4. Improved neighborhood distribution of housing vouchers.
5	<p>Poor credit history and collateral as barrier to accessing traditional</p>	<ol style="list-style-type: none"> 1. Expand access to credit counseling services for low-income and protected classes by partnering 	<p>2020 - 2024</p>	<ol style="list-style-type: none"> 1. Reduced number of loan origination denials based on

#	Impediment	Actions	Timeline	Intended Outcomes
	capital and wealth building through homeownership, especially for Black/African American residents.	with a credit counseling agency and conducting outreach to R/ECAP and majority-minority census tracts.		credit, as reported by FFIEC HMDA data.

Signature Page

1. Submission date:
2. Submitter name: City of Pompano Beach
3. Type of submission: Single program participant
4. Type of program participant(s): Consolidated Plan Participant
5. Sole or lead submitter contact information:
 - a. Name:
 - b. Title:
 - c. Department:
 - d. Street address:
 - e. City:
 - f. State:
 - g. Zip code:
6. Period covered by this assessment: 2020 - 2024
7. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AI in compliance with the requirements of the Department of Housing and Urban Development;

Signature:

Date:

Appendix