

CITY OF ST. LOUIS

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

prepared for the
Community Development Administration
January 2015

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Introduction and Executive Summary

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin, and was amended in 1988 to include familial status and disability. U.S. Department of Housing and Urban Development (HUD) grantees receiving funds under the Community Development Block Grant (CDBG) program are required to complete a fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that housing and urban development programs are being administered in a way that furthers fair housing for these protected classes.

This is the revised Analysis of Impediments to Fair Housing Choice (AI) for St. Louis City¹. The purpose of this AI, as regulated by the HUD is to identify discriminatory practices or effects for the following protected classes identified in federal fair housing law: color, disability, familial status, gender, race, religion, and national origin. In addition, St. Louis City Ordinance No. 67119, as amended, also identifies sexual orientation/gender identity, source of income (must be legal income), and age (40 and above, employment) as protected classes.

The research collected demographic information, analyzed the laws and practices of the City of Saint Louis, and examined the housing industry. HUD defines an AI as "a review of impediments to fair housing choice in the public and private sector." The AI involves:

- A comprehensive review of an entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices.
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes.
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

For the purposes of this analysis, the City has defined fair housing in accordance with the HUD official definition as "equal access to rental housing and homeownership opportunities" for all groups, particularly protected class members. Data referenced below derives from the 2010 Census as well as the Census Bureau's American Community Survey program where 2010 Census data were not available².

¹ The Planning and Urban Design Agency ("PDA") of the City of St. Louis ("the City") issued a request for proposals in October 2010 for professional services for the development of an Analysis of Impediments to Fair Housing Choice (AI). As a result of this process, Community Program Development Corporation/Development Resource Group (CPDC/DRG) was selected to assist the City in producing the AI. This effort was supported by Community Development Block Grant Funds. In 2014, the City received guidance from the Office of Fair Housing and Equal Opportunity regarding the submitted AI. The City retained a team consisting of H3 Studio and Rise Community Development to revise the AI produced by CPDC/DRG in accordance with this guidance.

² The U.S. Census Bureau discontinued the Summary File 3 report—better known to the public as the "long form"—for its 2010 Census. The long form data supplied an accurate picture of the country down to the block level for a large variety of data points. In order to provide detailed data on an annual, rather than decennial, basis for the nation, the Census Bureau made the decision to rely on the American Community Survey (ACS) estimates program to obtain "long form" data. As a result of smaller sample sizes, however, the Bureau must wait until several years' worth of data are accumulated prior to releasing estimates for small areas such as a census tract or block group. Thus this document utilizes ACS 2005-2009 "Five-Year Estimates" for small-area analysis.

Regional Fair Housing Concerns

This AI demonstrates that the City of St. Louis is committed to affirmatively furthering fair housing within its boundaries and focuses on actions that City departments can be held accountable for. However, patterns of segregation and investment/disinvestment are regional in nature and do not respect jurisdictional boundaries. Fortunately, the level of collaboration between the City and surrounding jurisdictions has increased significantly in the past decade, allowing the region to voluntarily tackle challenges together. The St. Louis Economic Development Partnership is a collaboration between the economic development agencies of the City of St. Louis and St. Louis County and the private sector, working to align and advance economic development efforts across the region. The OneSTL Plan for Sustainable Development, spearheaded by the East West Gateway Council of Governments and produced utilizing a HUD Sustainable Communities Grant, is a regional document that outlines what the people of St. Louis want for the future of the region as well as strategies, tools and resources for achieving the OneSTL Vision. The OneSTL Plan includes a Fair Housing Equity Assessment (FHEA) that jurisdictions throughout the region – including the City – can refer to in order to plan for investments that affirmatively further fair housing. Additionally, the City and County are currently collaborating on a Promise Zone application, demonstrating a commitment to working together to solve regional issues. Finally, during the development of this AI, other regional draft Analyses of Impediments were used as references, especially the 2014 draft Analysis of Impediments to Fair Housing Choice for a Consortium consisting of St. Louis County, Missouri, the City of Florissant, Missouri, and the City of O'Fallon, Missouri.

Participants

In outlining their vision for the development of this document, City staff mandated that the consultant seek the widest possible input from residents, stakeholders, housing professionals, lenders, not-for-profit organizations, City staff, and community and government leaders. To this end, the consultant contacted representatives of various housing organizations, social service agencies, lending institutions, universities, and governmental institutions to participate in a survey. The survey contained a range of questions about possible impediments relating to public sector policies, municipal and neighborhood services, assisted housing, private sector real estate practices, and fair housing enforcement. A copy of the survey (including a summary of responses) is available in Appendix C.

In addition, two informational meetings were held in 2011 in order to educate the public on the AI process and gather comments that were used to develop the first draft of this AI. These meeting notices were posted in City buildings and appeared in print and online media.

On November 6, 2014, from 9:00 am to 11:00 am, the Community Development Administration hosted an Action Strategy Workgroup Meeting facilitated by Tim Brieihan from H3 Studio and Stephen Alceee and Eleanor Tutt from Rise Community Development in order to identify and prioritize action steps to alleviate impediments to fair housing choice. Summarized notes from this meeting can be found in Appendix E.

Finally, CDA will hold a public hearing on January 5, 2014 to explain the AI process to the public and solicit feedback and comments from the general public on the draft AI.

Methodology

The AI is a review of impediments to fair housing choice in the public and private sector.

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices;
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.
- Effective March 5, 2012, HUD-assisted and HUD-insured housing, including housing acquired, rented, or rehabilitated with Office of Community Planning and Development (CPD) funds, must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

The scope of the AI is broad. It covers the full array of public and private policies, practices, and procedures affecting housing choice. The AI:

- Serves as the substantive, logical basis for fair housing planning;
- Provides essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates;
- Assists in building public support for fair housing efforts both within a state or entitlement jurisdiction's boundaries and beyond.

Equal and free access to housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.

In developing the AI, it is important to note that, although the document is primarily data-driven, it must serve as a useful tool for on-going, substantive planning efforts to further equal and free access to housing for all citizens. This document provides essential information to policy makers, City staff and stakeholders in their efforts to erase housing barriers.

Although the AI has many components, the most basic elements are identifying the Impediments and making recommendations to address the following main functions:

1. Gather Jurisdictional Background Data
 - A. Demographic Data
 - B. Housing Profile
 - C. Maps
 - D. Other Relevant Data
2. Evaluate the Jurisdiction's Current Fair Housing Legal Status
 - A. Evaluation of Fair Housing Complaints or Compliance Reviews
 - B. Evaluation of Any Fair Housing Discrimination Suits
 - C. Identify Trends/Patterns
 - D. Other Concerns/Problems
3. Identification of Impediments
 - A. Public Sector
 - B. Private Sector
 - C. Public and Private Sector
 - D. Legal Determination or Finding of Non-Compliance
4. Assessment of Current Public/Private Programs or Activities
5. Make Conclusions and Recommendations

The following outline describes the tasks necessary to developing a comprehensive AI.

Task	Description
Collection of existing data	Compilation of existing data from the City, HUD, local colleges and universities, and local and regional fair housing & planning organizations, and other individuals and organizations.
Interviews/meetings for the purposes of data collection and input from interested parties	Primary source data collection through meetings/interviews with City personnel, stakeholders, housing providers, fair housing organizations, advocacy groups, financial institutions, educational institutions, and other individuals and organizations.

Identification and evaluation of current activities	Establishing a comprehensive database documenting existing efforts along with any appropriate measures of efficacy.
Public Engagement	Holding meetings to educate the public on the AI process and provide an update on the information that has been collected. This process will also provide an opportunity to gather suggestions and input from members of the community. In addition, a working document will be presented at a public meeting for public comment.
Data Analysis and Drafting of Narratives	Compilation of a working document.
Final Draft	A final draft will be provided for public review/comment at a public meeting. Hard copies will be provided to libraries, local government offices, and the document will be made available online.
Final Public Meeting	A meeting to present the final draft document to the public, answer questions and gather comments/suggestions

The data that are required for the AI originated from a variety of public and private sources. Much of the necessary data were gathered from existing documents, including the most recent Consolidated Plan. Other data, along with recommendations, were gathered in primary source interviews. Public input was sought during two public meetings held in 2011 that helped frame the initial first draft of the AI. A workgroup was held November 6, 2014 in order to identify and prioritize action steps to alleviate impediments to fair housing choice. In addition, a 30-day comment period will allow members of the public to comment on the final version of this document and another public hearing will be held January 5, 2014 in order to solicit public feedback and comment on the AI.

Geographic References

Several of the maps depict census tracts, while accompanying text references city neighborhoods. In order to line up census tracts with the City of St. Louis's 79 official neighborhoods, see **Map A** and **Map B**. Please note that census tracts change slightly from each decennial census; therefore, two maps are provided showing 2000 Census Tracts (Map A) and 2010 Census Tracts (Map B). Neighborhood boundaries have remained the same. The American Community Survey program of the U.S. Census Bureau utilized the 2000 tracts, while the 2010 tracts were created for the 2010 Census.

This document shall use "North St. Louis", or the North Side, and "South St. Louis", or the South Side, to refer to the area of the city north of Delmar Boulevard and south of Interstate 64/Highway 40, respectively. The area in between is known as the Central Corridor, or, more simply, the central portion of the City.

MAP A



MAP B

City of St. Louis 2010 Census Tracts with Neighborhoods



Prepared by the Planning and Urban Design Agency, City of St. Louis on June 15, 2011

Demographic Profile

Introduction

The City of St. Louis is the central city of the metropolitan area, which includes counties in Missouri (the City of St. Louis, St. Louis County (separate from and not inclusive of the City of St. Louis), Franklin, Jefferson, Lincoln, St. Charles, Warren, Washington, and a portion of Crawford County) and in Southern Illinois (Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, and St. Clair). The metropolitan area has a total population of approximately 2.8 million. The City was founded by the French as part of the Louisiana Territory in 1764. The city, as well as an additional 800,000 square miles covering 15 present-day states, became part of the United States with the 1803 Louisiana Purchase. As a western outpost located on one of the nation's great rivers, St. Louis experienced a population boom as goods and people entered the city in anticipation of the nation's westward growth. Immigrants, especially from Germany, began flooding into the city by the 1840s, filling jobs along the industrial riverfront. After the Civil War, St. Louis's growth became even more pronounced as the city became a major western rail hub, surpassed only by Chicago. By the turn of the 20th Century, St. Louis was preparing to host the prestigious World's Fair as the nation's fourth largest city.

The present-day boundaries of the City of St. Louis encompass some 61.4 square miles and were fixed at their current limits by a vote of residents in 1876. The City of St. Louis is an independent city and is one of only a handful of cities in the country that function as both cities and counties. Thus, it has not been possible for the City of St. Louis to add to its land area and tax base by annexing adjacent unincorporated land area. Despite this, the City continued to grow in population until 1950, when it peaked at approximately 856,000 people, making it the eighth largest city in the nation. Since that time, the once overcrowded city's population has declined sharply, due in part to interstate construction and subsequent suburban developments surrounding the city. According to the 2010 Census, this trend of population decline has continued with the population being 319,294 people.

Most of the descriptive data in this section comes from the 2010 Census and from the 2005-2009 American Community Survey 5-Year Estimates (ACS), when specific data is not available through the 2010 Census. It is important to note that the population estimate in the American Community Survey (ACS) was 355,078, which as an estimate produced prior to and independent of the decennial census, is significantly higher than the 2010 Census.

Total Population

The following table demonstrates the population decline since 1950, the city's historical peak year for population. Table 1 shows that the city's decline in population accelerated through 1980 when the City lost over a quarter of the population over the course of the decade. The substantial urban decline witnessed over the past 60 years has left the City almost a third of the size it was at its peak, causing a serious strain on resources as the City grapples with vacant housing and excess infrastructure. In the last thirty years, however, the loss has slowed considerably.

Table 1
Population of the City of St. Louis 1950-2010

	1950	1960	1970	1980	1990	2000	2010
Population	856,796	750,026	622,236	452,801	396,685	348,189	319,294
Population Loss	n/a	(106,770)	(127,790)	(169,435)	(56,116)	(48,496)	(28,895)
Percentage	n/a	-12%	-17%	-27%	-12%	-12%	-8%

Source: U.S Census Bureau

In the past decade, most areas of the City of St. Louis experienced some loss of population with the North Side experiencing the largest percentage of population loss (see Map 1). However, a small corridor from downtown to midtown experienced significant growth. The areas with the highest population, both in density and raw numbers, are near Forest Park and in South St. Louis (see Maps 2 and 3).

Household Type

In the City of St. Louis, 52.5% of households are noted as non-family compared to 47.5% of family households (Table 2). The average household size is 2.16 persons. Over the last 40 years the trend has been toward smaller households with more non-family households. The most recent findings show a continuation of that trend.

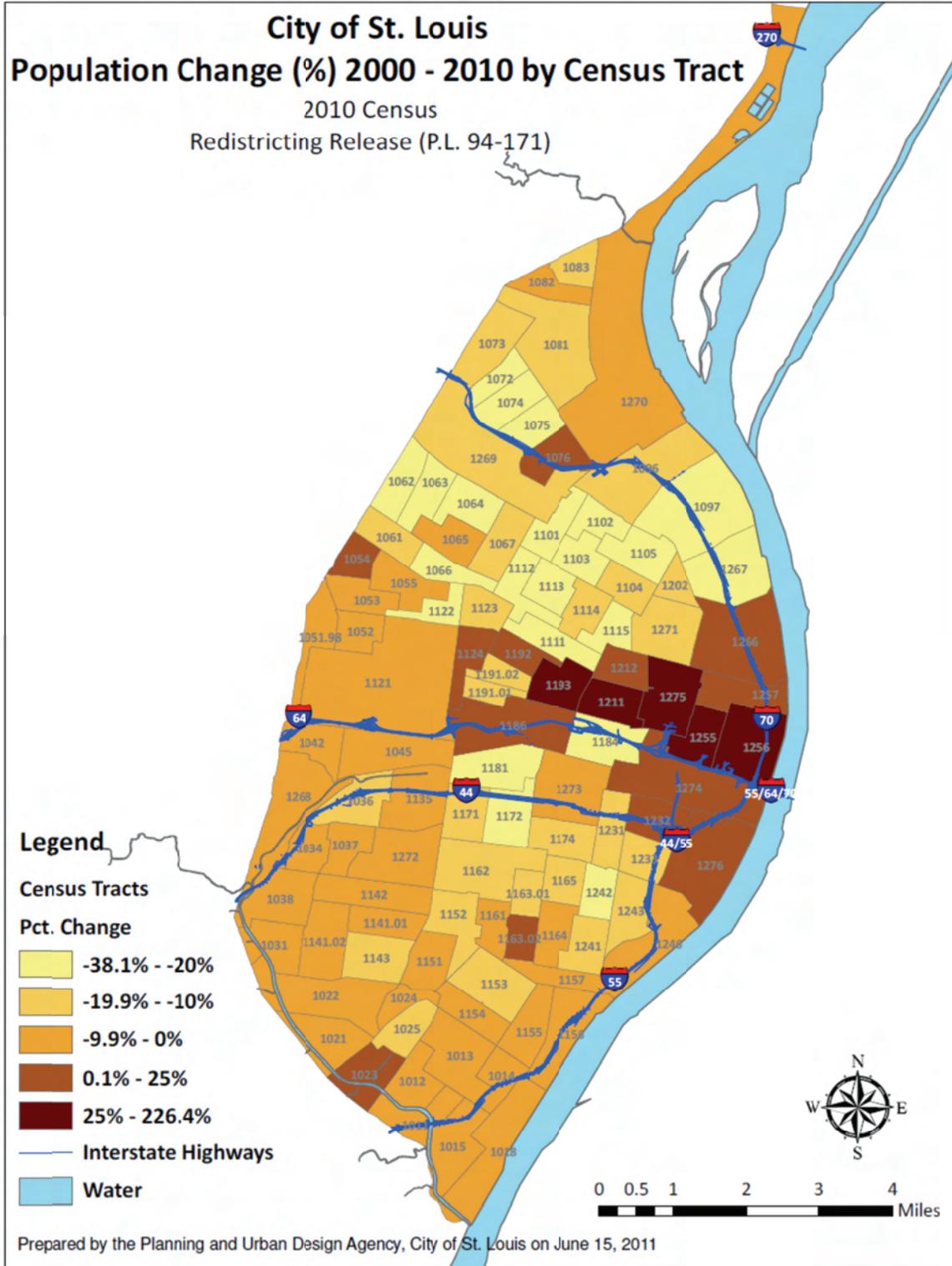
Table 2
Household Type by Decade

Household Type	1970		1980		1990		2000		2010	
Family*	148,925	69.1%	106,901	60.0%	90,945	55.1%	76,979	52.3%	67,488	47.5%
Non-Family*	66,554	30.9%	71,147	40.0%	73,986	44.9%	70,100	47.7%	74,569	52.5%
Total	215,479		178,048		164,931		147,079		142,057	

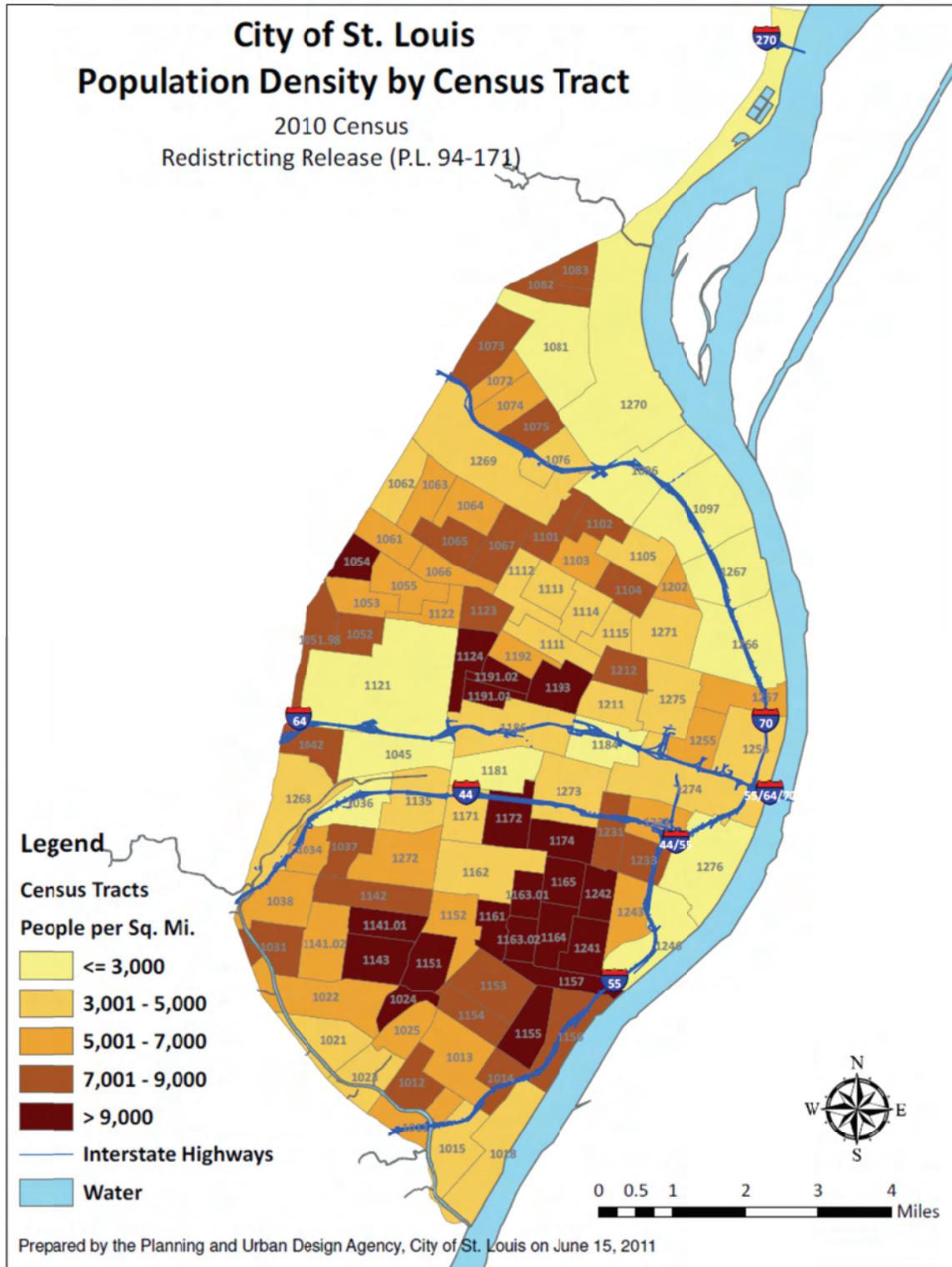
Source: U.S Census Bureau

*Note: Family indicates households with 2 or more related persons; non-family indicates a single person household or a household with non-related people.

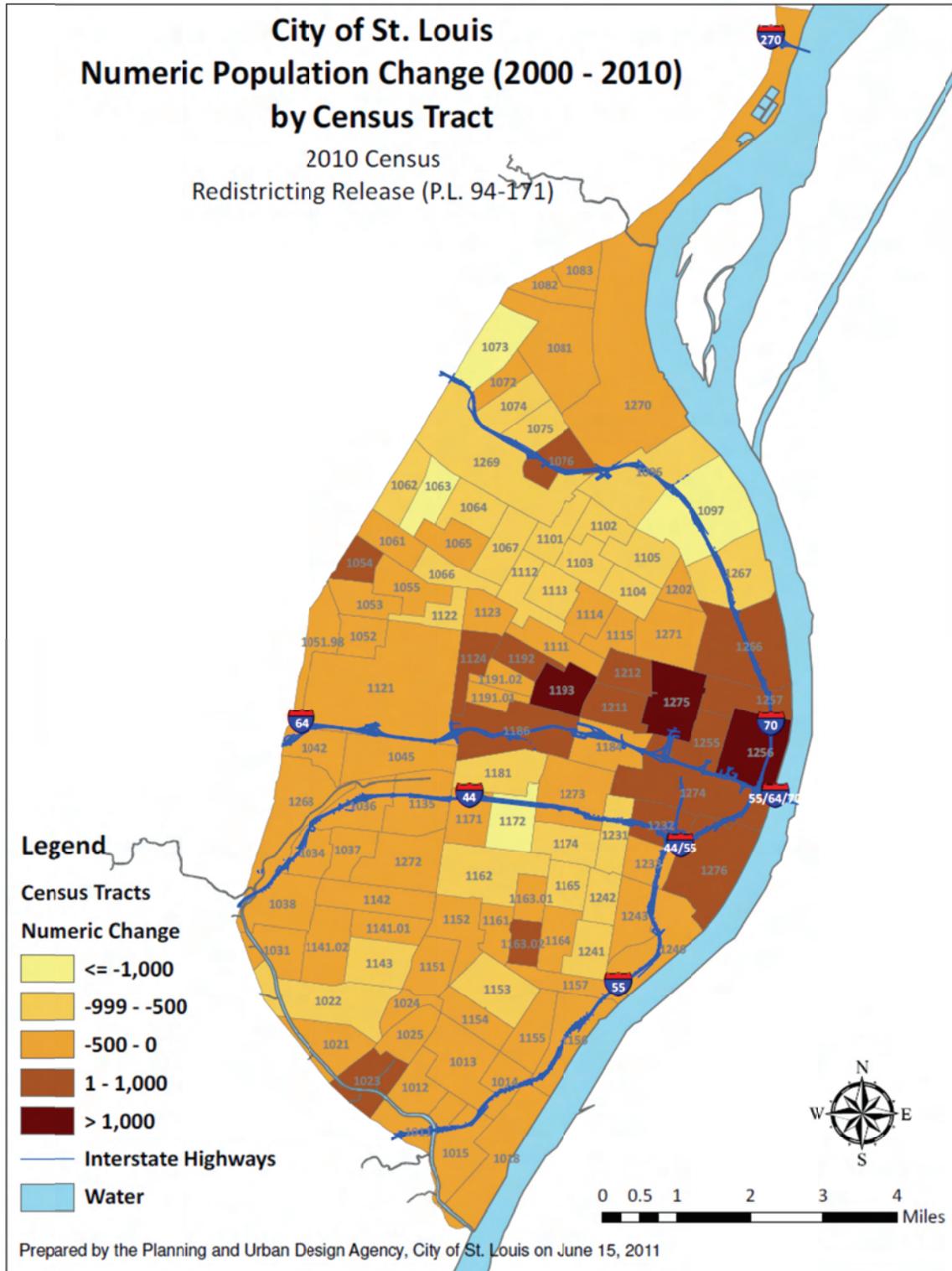
MAP 1



MAP 2



MAP 3

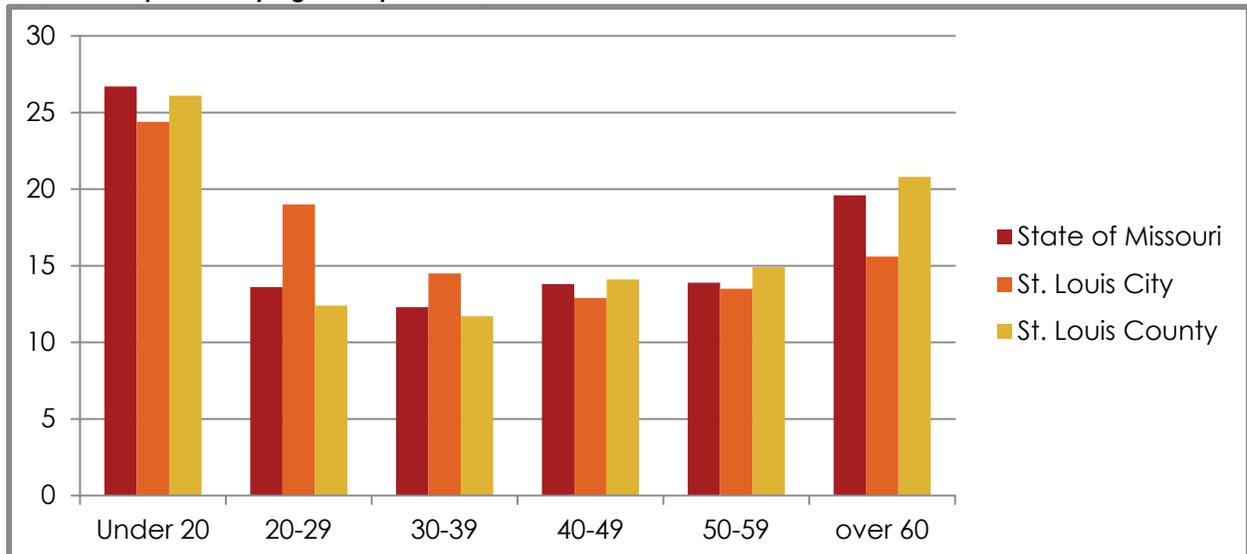


Age

The population of St. Louis is comprised mostly of adults age 20 and over (75.5%), with 15.6% of the population being over the age of 60. The age spread for the City of St. Louis has some variations when compared to St. Louis County and the State of Missouri. St. Louis County and Missouri are very similar when comparing the percentages in each age category with the largest spread being 1.2%. The City population makeup by age differs from that of the other two jurisdictions. The City has higher populations of people in their 20s and 30s, but lower percentages of people under 20 and over 60 (see Graph 1).

Graph 1

Percent of Population by Age Comparison 2010



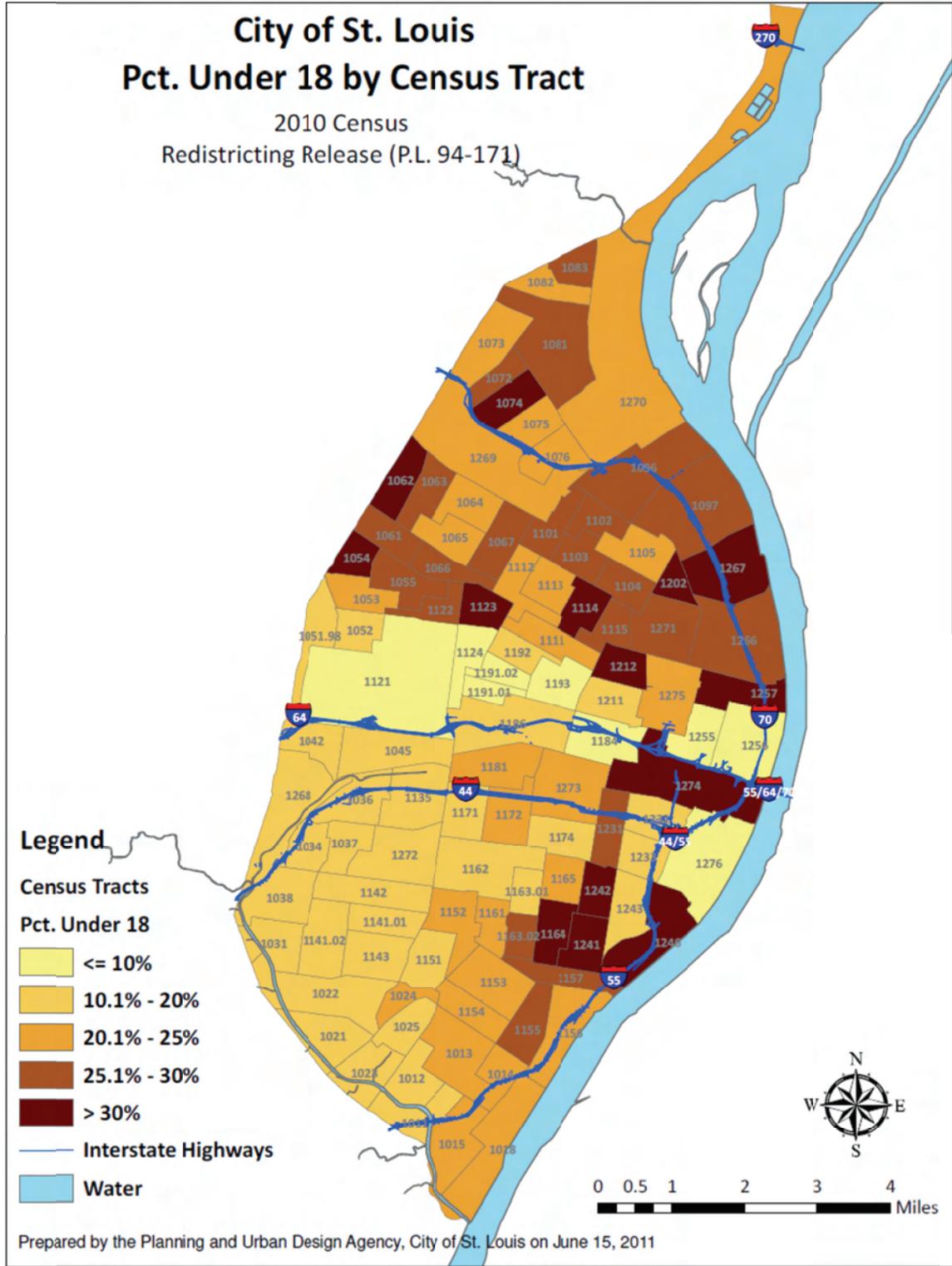
Source: 2010 Census

There has been a pronounced loss of children in the City over the past decade, except for the areas near downtown that experienced significant growth. The City lost roughly a third of its population aged 5 -14 from 2000 to 2010. Further, the demographic "married couple with own children" now comprises just 8.4% of households in the City of St. Louis, down from 10.8% in 2000 and 13.2% in 1990. Still, 67,539 children (under age 18) lived in the City as of April 1, 2010. Map 4 demonstrates that this young population is concentrated in the northern and southeastern sections of the city where the highest poverty rates exist. The Central Corridor, along with Soulard, has relatively few children. The presence of children in a household has a major impact on where that family can live comfortably. Large families may have a difficult time locating housing with enough bedrooms and space to avoid overcrowded conditions.

MAP 4

City of St. Louis Pct. Under 18 by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)



MAP 5

City of St. Louis Change in Under 18 Pop. (2000 - 2010) by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)

Legend

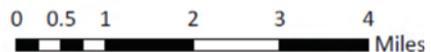
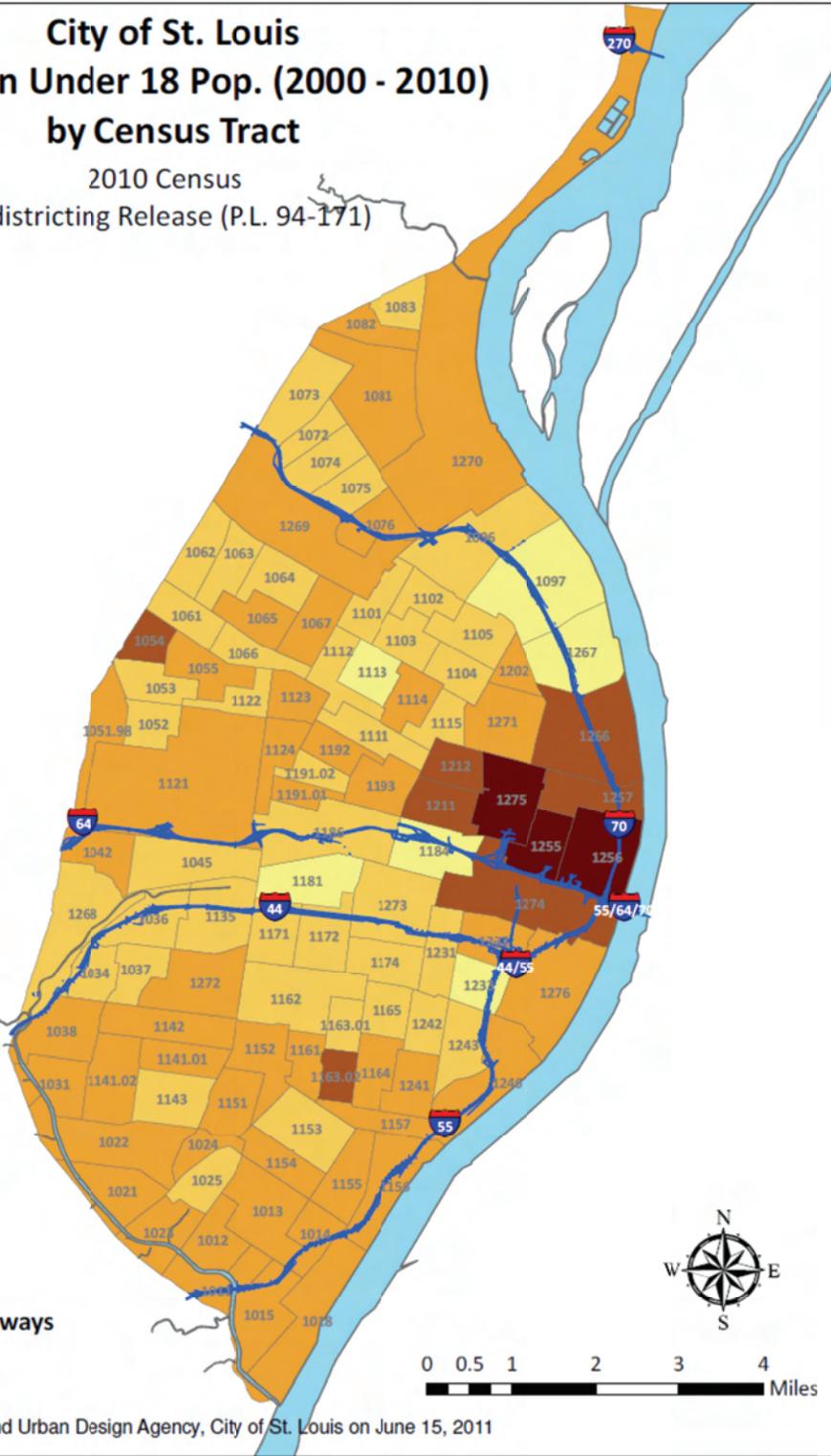
Census Tracts

Chg. in Under 18

- 87.5% - -50%
- 49.9% - -25%
- 24.9% - 0%
- 0.1% - 25%
- 25.1% - 87.8%

Interstate Highways

Water



Prepared by the Planning and Urban Design Agency, City of St. Louis on June 15, 2011

Elderly

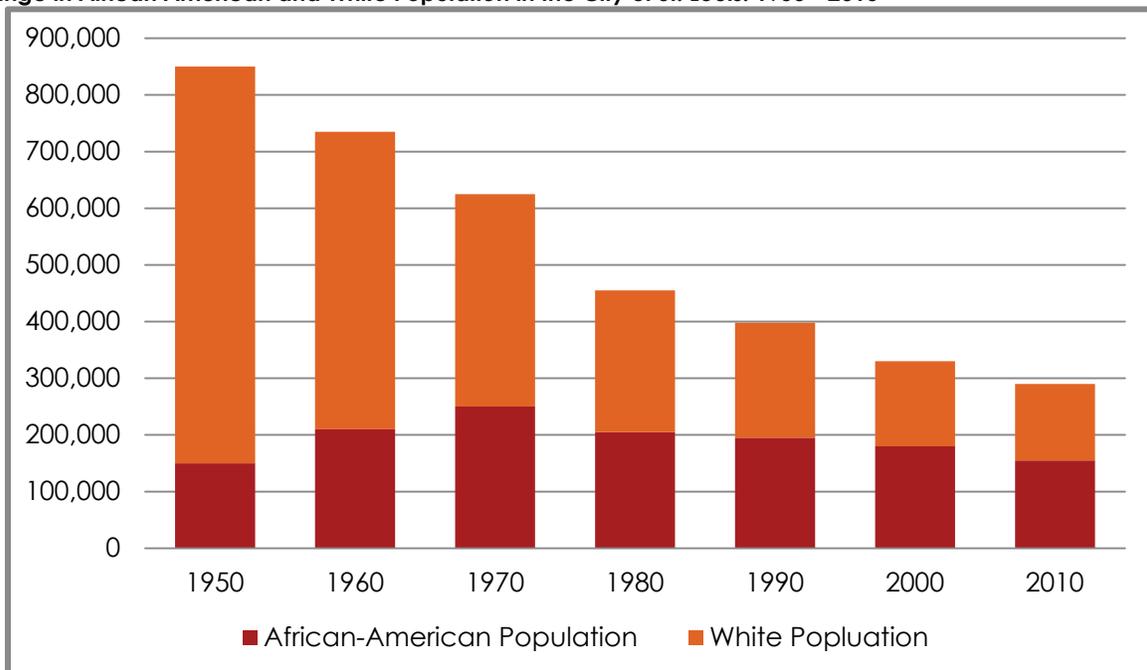
The elderly population consists of citizens who are 65 years old or older. The aging population presents unique challenges for the City of St. Louis. At about 16% of the population, the elderly comprise a smaller proportion of the population in the City than in St. Louis County and the State of Missouri. However, over half the City's elderly population have some sort of disability, and many require housing modifications and/or attendant care. Many elders live alone and are dependent on social services and nursing care in order to remain in their homes.

Race

The City of St. Louis is a racially diverse city with whites and African Americans being the two largest racial or ethnic groups. The City has had an African American majority population since the 2000 Census (see **Graph 2**). The white population, representing a bare majority of the city in the 1990 Census, has declined dramatically from its post-war population peak. In 1950, over 700,000 white residents called the city home. By 2010 this number had dropped fully 80% to 140,000. The 1980 Census showed the first drop in African American population. This trend has continued and has accelerated, with the 2010 Census showing a faster decline in the African American population than in the white population for the first time. In fact, despite an 8.1% decline of the white population between 2000 and 2010, the share of this population actually inched up from 43.8% to 43.9%.

Graph 2

Change in African American and White Population in the City of St. Louis: 1950 - 2010



Source: U. S. Census Bureau

The Racial Population Comparison (**Table 3**) shows the population breakdown by race of St. Louis City, St. Louis County, and the entire State of Missouri. St. Louis City and County taken together contain 22% of the population of Missouri. There are some similarities across the three jurisdictions. For instance, the Asian population is 2.9% of St. Louis City, 3% of St. Louis County, and 2% of the state as a whole, showing a very slight urban concentration. Looking at the White (non-Hispanic) and African American populations, however, one sees a distinct difference when comparing the three jurisdictions. Only 11% of the population of Missouri is African American, but the percentages increase in the population centers of St. Louis County (23%) and St. Louis City (49%). St. Louis City is the only county-equivalent (and the only major city) in the state of Missouri with the African-American population as the largest racial group.

Additionally, St. Louis has a large Bosnian presence. As of 2013, there were an estimated 70,000 Bosnians in the St. Louis metropolitan area, many of whom live in South St. Louis City neighborhoods, such as Bevo Mill, or who otherwise have ties to South St. Louis City neighborhoods.³ Unfortunately, the 2010 Census data racial and ethnic data in Table 3 below does not specify the exact number of persons with Bosnian heritage living within the City – most of whom would fall into the category of “White (non-Hispanic).” However, Bosnians are a significant ethnic group within the City of St. Louis.⁴

Table 3
Racial/Ethnic Population Comparison

	St. Louis City		St. Louis County		Missouri	
Total Population	319,294		998,954		5,988,927	
White (non-Hispanic)	134,702	42.2%	687,984	69%	4,850,748	81%
African American	156,389	49.0%	231,801	23%	687,149	11%
American Indian	684	0.2%	1,632	0.2%	24,062	0.4%
Asian	9,233	2.9%	34,466	3%	97,221	2%
Two or More Races	6,616	2.1%	16,587	2%	106,142	2%
Other	540	0.2%	1,460	0.1%	11,135	0.2%
Hispanic*	11,130	3.5%	25,024	3%	212,470	4%

Source: 2010 Census

*Note: The Census considers “Hispanic” to be an ethnic classification, since there are multiple races represented within the ethnicity.

Since the 1970s, the North Side has been largely African-American; while the South Side was predominantly white. 2010 Census data reveal a growing and unprecedented level of integration in the southern portion of the City, while the northern section remains predominately African-American. Populations of other races and ethnicities reside largely in the southern half of the City. Hispanics tend to live in the southeastern portion of the city (e.g., Benton Park West), with Asians residing primarily in south-central neighborhoods (e.g., Tower Grove South) or the central corridor (e.g., Central West End). Most other racial groups are very small in number and constitute a small percentage of the overall population. Please see **Appendix H** for maps of all Census-defined races (including less-represented groups, such as American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, etc.).

The African American population grew most significantly in the south central and southeastern portions of the City, especially in the vicinity of the Dutchtown neighborhood (see **Map 7**). The share of African Americans also increased, to a lesser extent, in each of the southwest St. Louis neighborhoods (Lindenwood Park, St. Louis Hills, etc.) as well as in the northern extremes of the city (Baden, Riverview, etc.). African American population declines were witnessed most heavily in several South St. Louis neighborhoods, including Benton Park, Shaw, and Souldard, as well as in neighborhoods bordering Forest Park. The pattern is reversed for the white population, with whites showing substantial percentage gains in these areas and losses in the extreme southern and northern portions of the City (see **Map 9**).

It is important to note that these patterns of racial segregation are rooted in historic housing discrimination⁵. In 1916, by a three-to-one margin, voters enacted a segregation ordinance holding that no one could move to a block on which more than 75% of residents of another race. The NAACP successfully fought the order in the courts. White separatists responded by creating associations of white residents living in neighborhoods near black residential areas to solidify segregated housing. One member organization, the Marcus Avenue Improvement Association, sought to ban blacks from moving into an area bound by Kingshighway, Natural Bridge, Newstead, and Easton. Each property had attached to it a fifty-year covenant forbidding sale of the house to “persons not

³ <http://www.citylab.com/politics/2013/02/why-are-there-so-many-bosnians-st-louis/4668/>

⁴ <http://www.stlbosnians.com/>

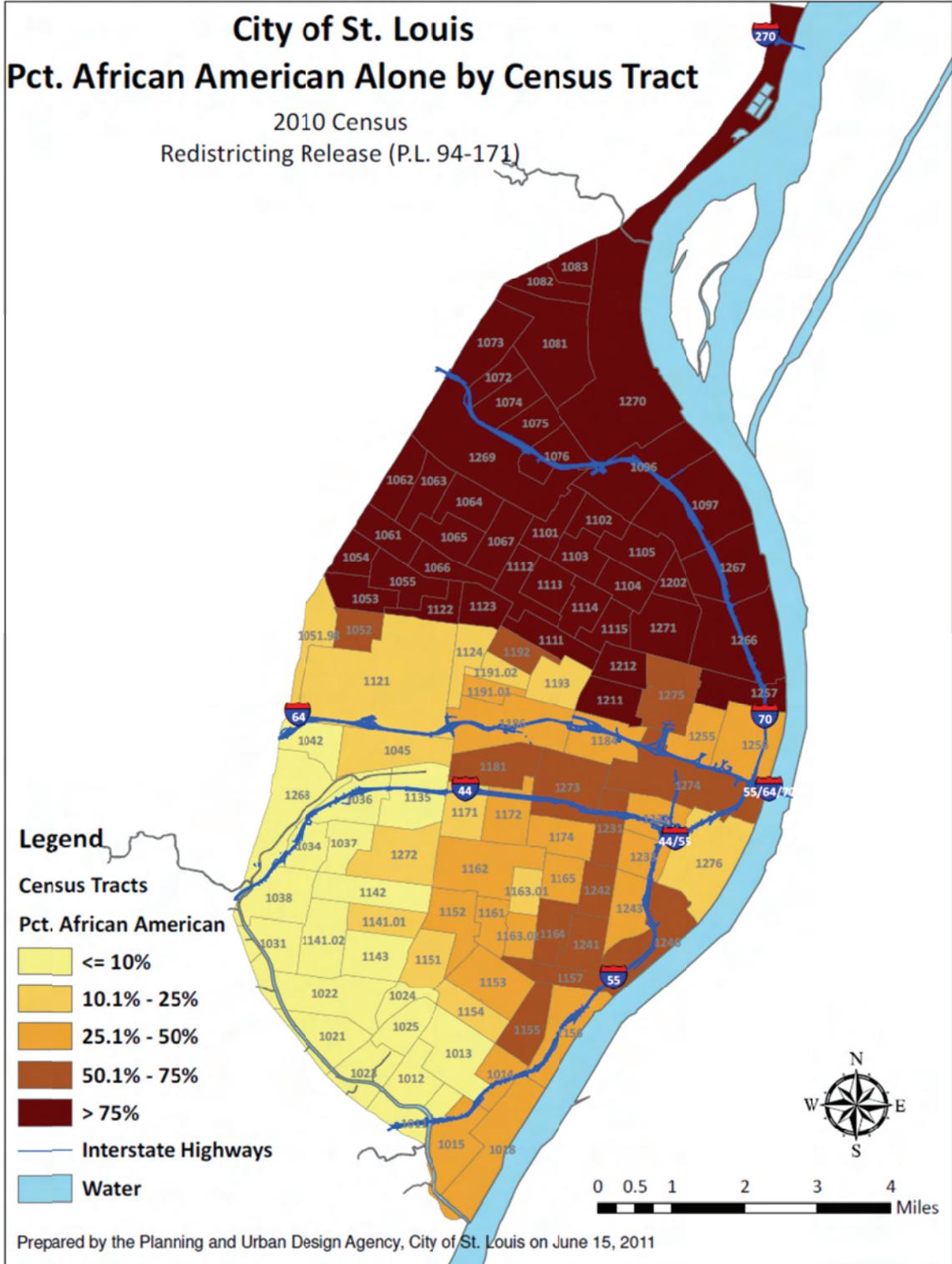
⁵ <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

of Caucasian race." In part because of these racial covenants, The Ville neighborhood became the primary neighborhood for middle class blacks. In 1939, J.D. Shelley and his family purchased a home at 4600 Labadie, within the boundaries of the Marcus Avenue Improvement Association and Louis and Ethel Kramer, a white couple who lived across the street at 4532 Labadie, filed a lawsuit to preclude their moving in. This eventually led to the landmark 1948 US Supreme Court Case Shelley v. Kraemer which ruled that racial covenants limiting access to or ownership of property due to race violated the 14th Amendment of the Constitution.

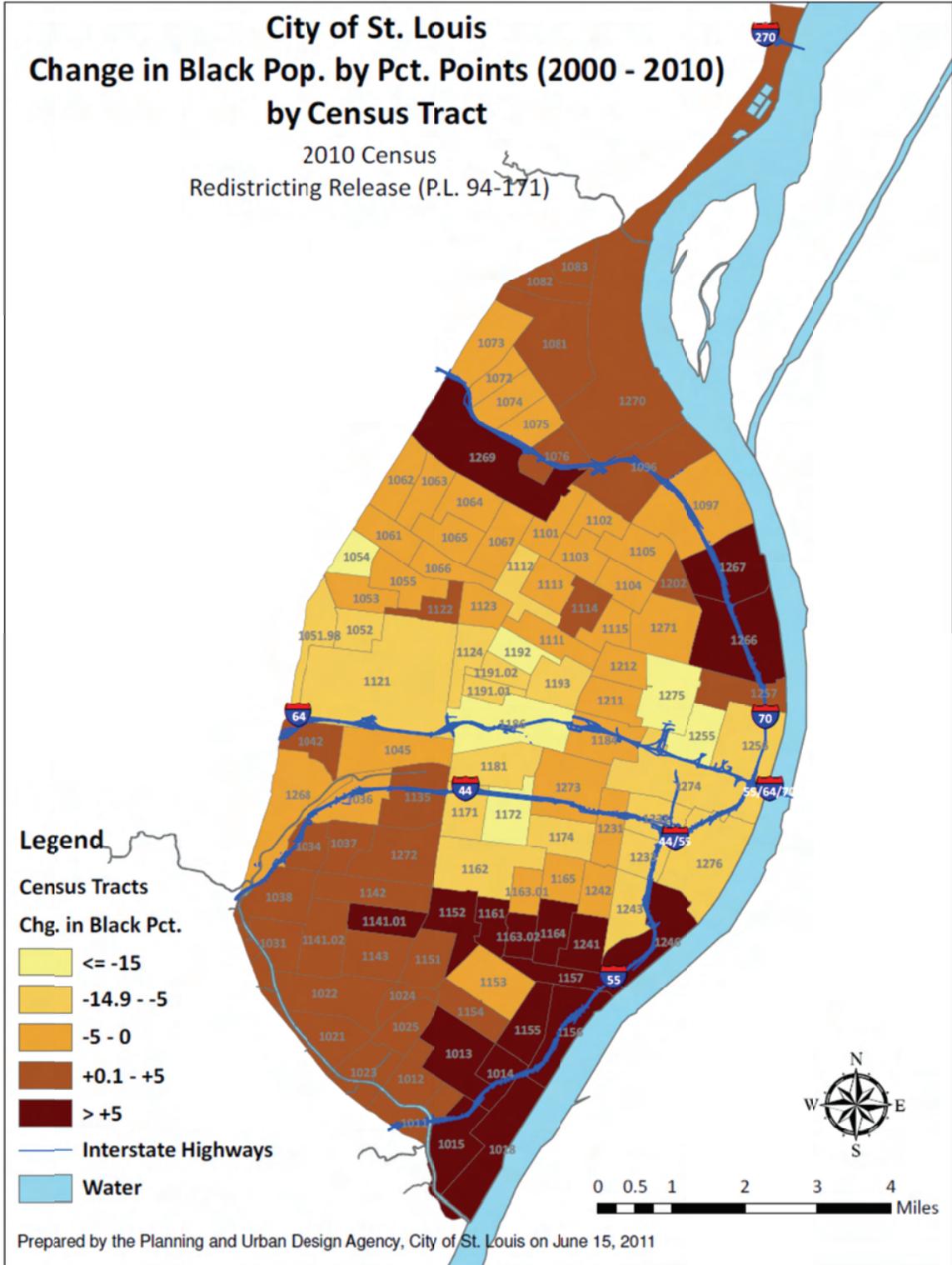
While the Shelleys were fighting to reverse segregated housing, other institutions were reinforcing it, whether by design or benign neglect. Urban renewal, in particular, was damaging to African American residents. In 1954, the St. Louis electorate passed a bond issue to redevelop Mill Creek Valley, an African American district with a mix of homes, tenements, shops, saloons, dance halls, and night clubs. Some 20,000 people lived in Mill Creek Valley (from Market and Vandeventer to the Mississippi River, and between 20th and Grand, extending south from Olive to the railroad tracks) and 95 percent of them were black. Demolition of the area began in 1959 to make way for Laclede Town, Grand Towers, the Ozark Expressway (US Highway 40), and a 22-acre extension by Saint Louis University. Some displaced residents moved to The Ville, others to the area between Delmar and Natural Bridge on both sides of Grand. This shift also accelerated the black migration already in progress to University City, Wellston, and Pine Lawn. The net result displaced thousands and reinforced the historic north-south racial division of the City of St. Louis.

Although today's patterns of segregation are rooted in historic housing discrimination, as partially described above, the issue is complicated by the fact that African American residents often hold strong allegiances to their current neighborhoods and that household quality of life is often related to existing community ties. While it may be tempting to "move" households in order to create more integrated neighborhoods, this strategy ignores the importance of social capital, including long-standing relationships with friends, neighbors, and social institutions that have been built over the years, as well as informal sharing of responsibilities (such as neighbors watching over each other's children). It is critical that fair housing strategies acknowledge historic realities while still recognizing the importance of personal agency in making decisions about where to live. In addition, existing neighborhoods – including those which are currently identified as racial and ethnic concentrations of poverty – should receive the support needed to grow into areas of opportunity (to the best degree possible given limited public resources).

MAP 6



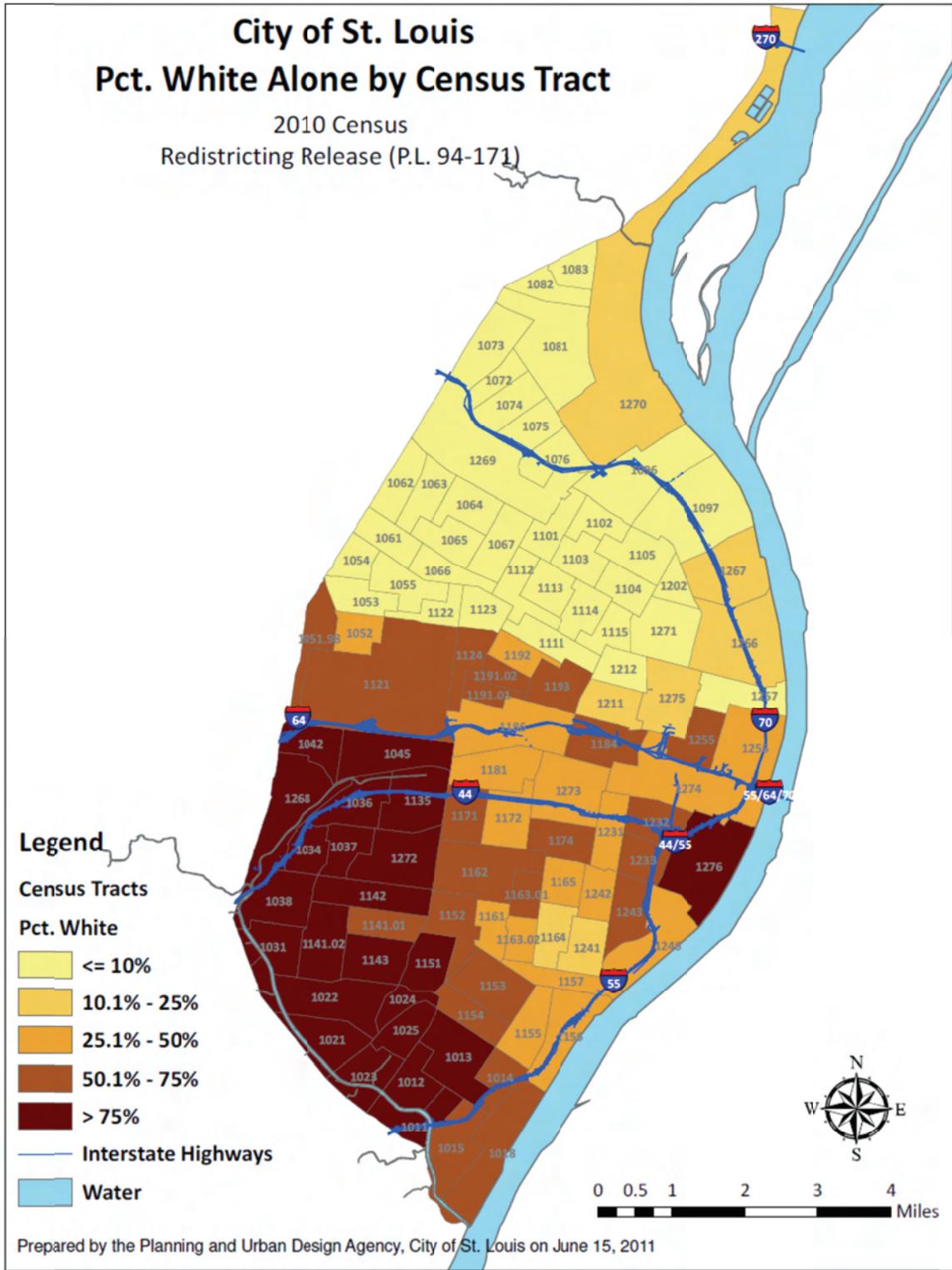
MAP 7



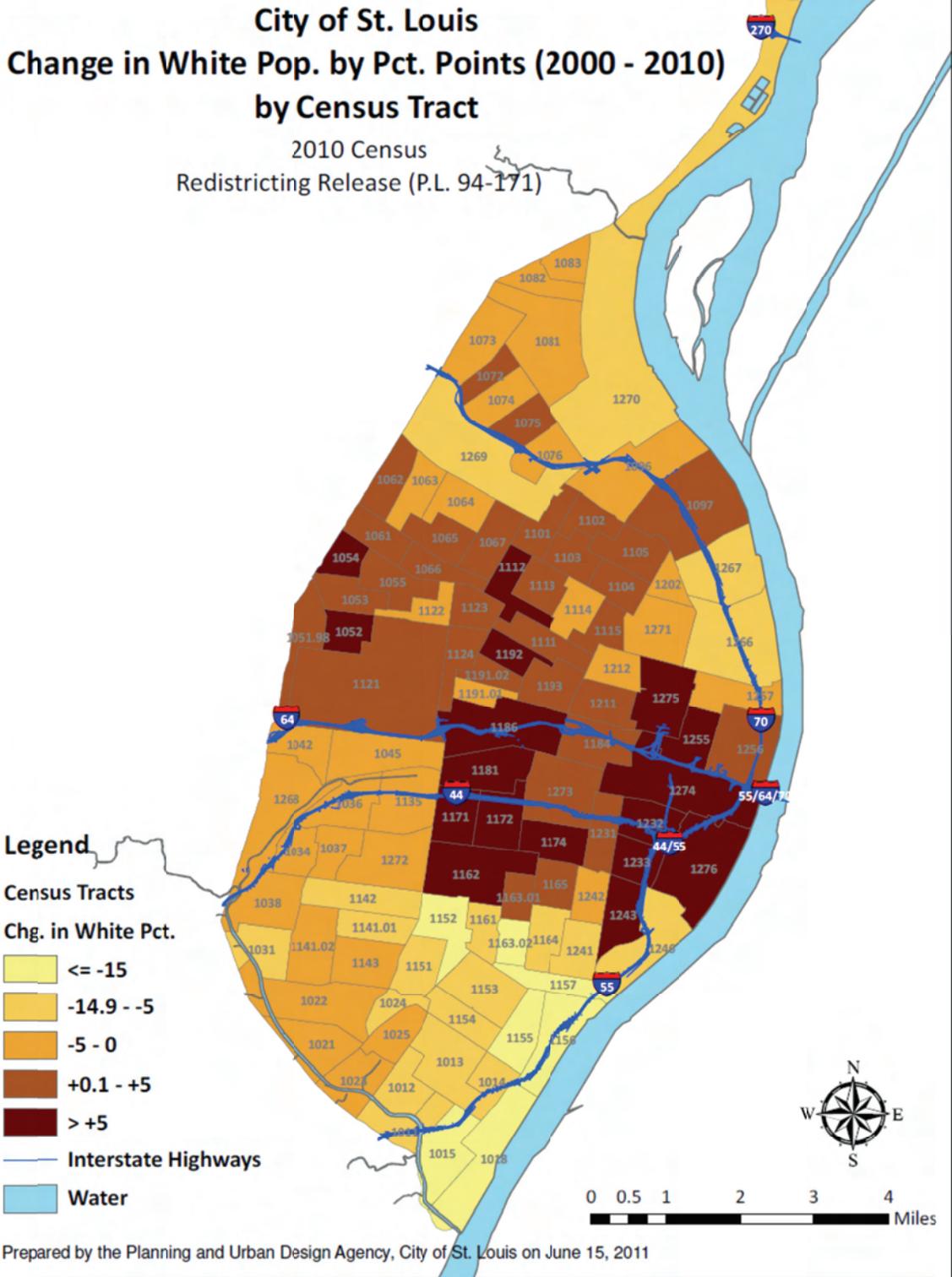
MAP 8

City of St. Louis Pct. White Alone by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)



MAP 9



Foreign-Born

The foreign-born population is a small but growing protected class in the City of St. Louis. That population makes up 5.9% of the total population, up from 5.6% in 2000 (per 2009 ACS estimates). About half of the City's foreign-born population entered the United States in the last decade. The majority of the foreign-born population lives in the southern portion of the city. About a third of the City's foreign-born population is naturalized citizens. This is a significantly smaller than that in St. Louis County where almost half of the foreign-born population are naturalized citizens (see Table 4).

Another disparity between the foreign-born population of the City of St. Louis and that of St. Louis County is in earnings. Over 25% of the City's foreign-born population have earnings at or below the poverty level, whereas, St. Louis County only has about 10% of that population living at or below the poverty level. Likewise, more of the foreign-born population in the City live in rental housing than in St. Louis County. St. Louis City has a higher percentage of African and Latin American immigrants, while St. Louis County claims more Asians and Europeans.

The foreign born population has been a significant contributor to the city's social fabric over the past decade. Bosnian and other Eastern European refugees settled in St. Louis (mostly centered on South Side neighborhoods such as Bevo Mill) starting in the late 1990s, and the community has grown to more than 50,000 individuals. This is the largest concentration of Bosnians outside of their native countries. A vibrant social service network dedicated to serving immigrants (e.g., the International Institute) has contributed to St. Louis's slight increase in foreign born population, now including Iraqis, Somalis, Burmese, and many others. Between 2000 and 2009 the International Institute alone assisted in the resettling of 5,372 refugees from over 40 nations into the St. Louis area⁶.

The foreign- born population has special needs for fair housing education enforcement. Immigrants may not know their rights when it comes to securing housing, and some landlords may harbor unwarranted biases against certain ethnic groups. Furthermore, the language and culture barrier is an ever present concern. Groups such as the International Institute work to alleviate some of these issues and to assist new arrivals into proper housing, but not all fair housing concerns can be addressed by such agencies.

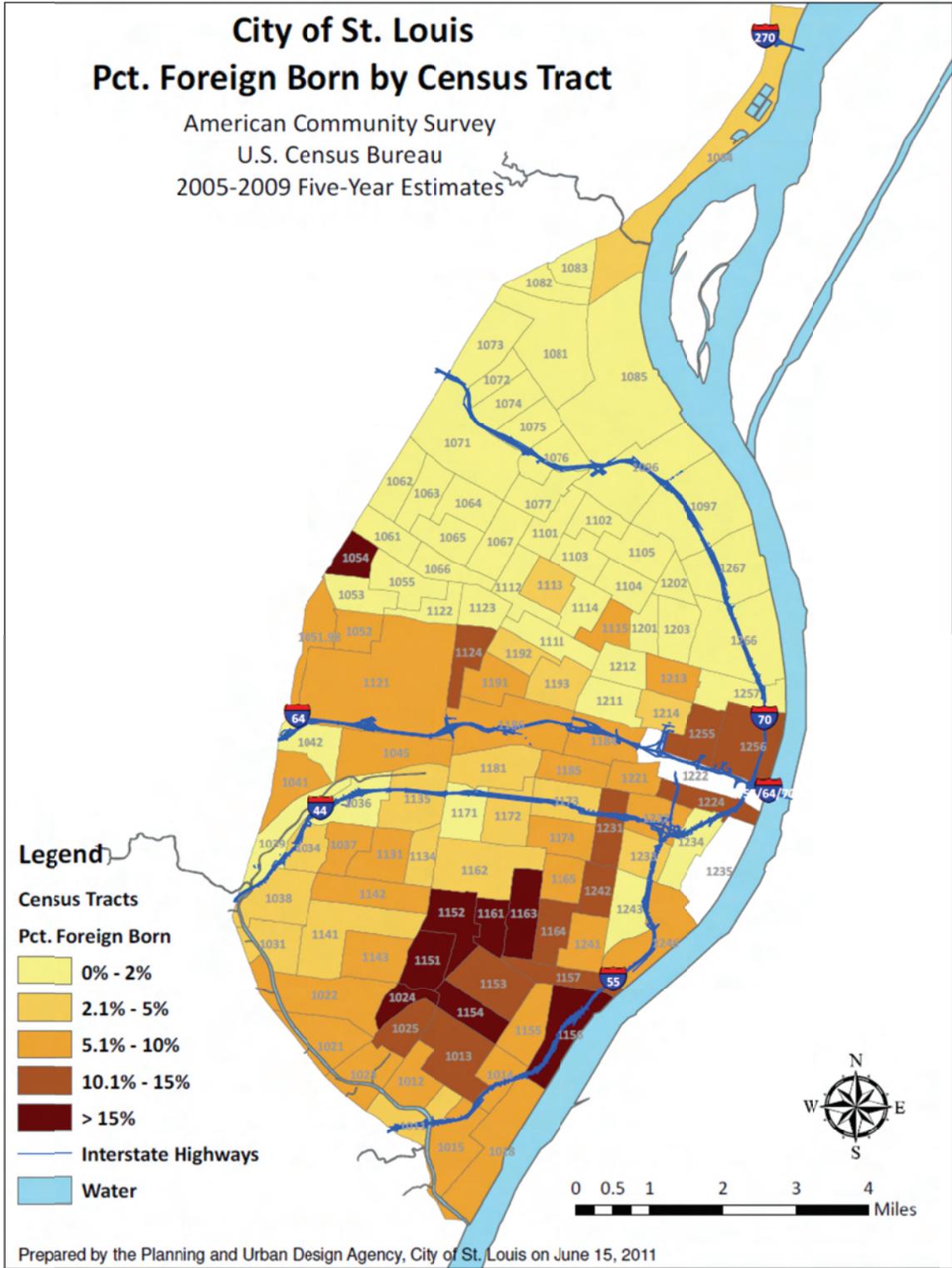
⁶ International Institute of St. Louis, http://www.iistl.org/pdf/ethnicities_of_refugees.pdf

Table 4
 Attributes of Foreign-Born Population in the City of St. Louis

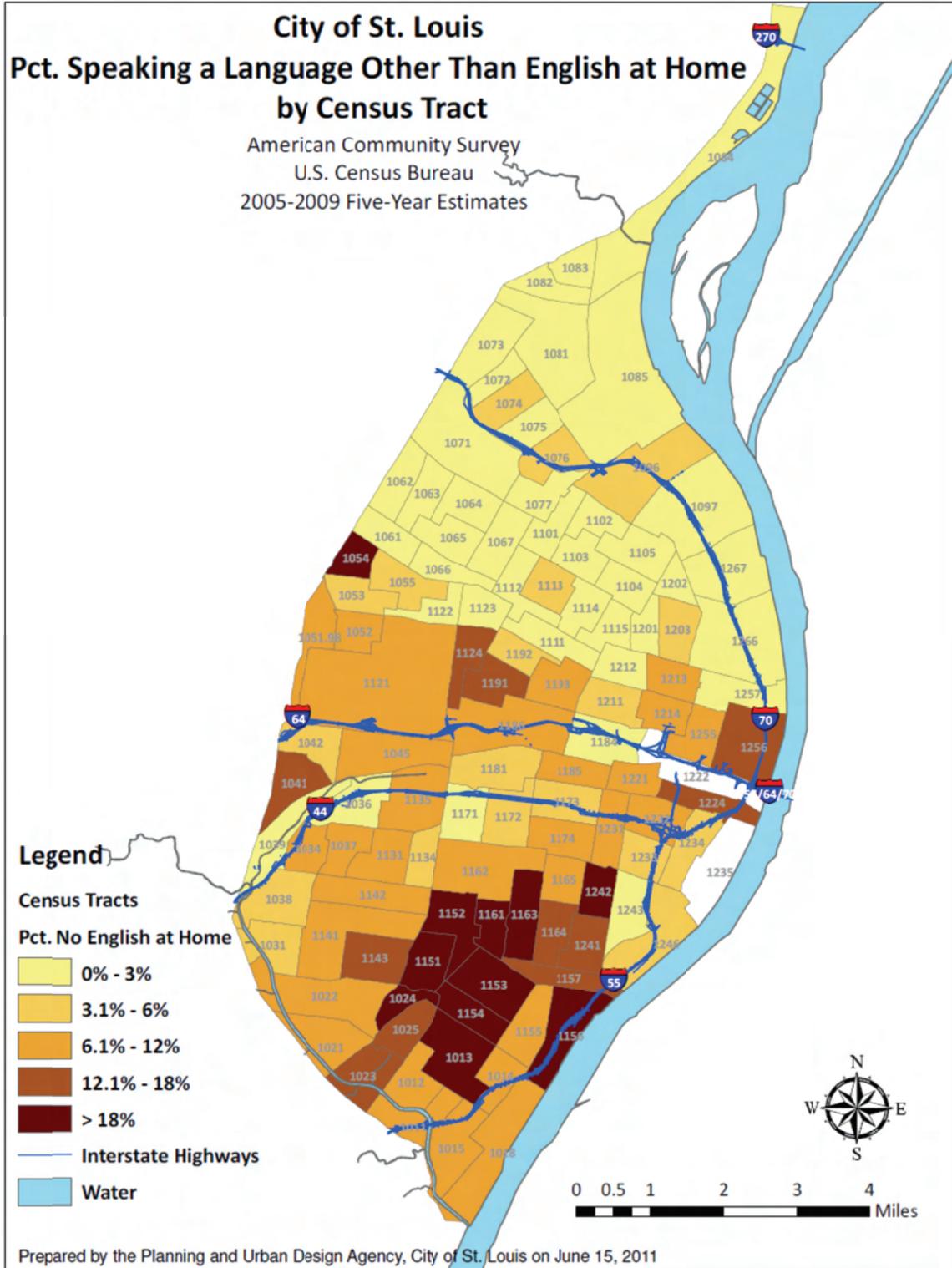
	St. Louis City	St. Louis County	Missouri
Entered before 1990	4,353	19,089	67,184
Entered 1990-1999	7,639	19,451	64,674
Entered 2000 or later	10,146	21,128	76,947
Total	22,408	59,668	208,805
Born in:			
Europe	30.0%	32.2%	24.3%
Asia	32.6%	42.3%	33.6%
Africa	12.7%	6.7%	7.1%
Oceania	0.1%	0.9%	0.9%
Latin America	23.0%	15.3%	31.3%
Northern America	1.6%	2.6%	2.8%
Naturalized citizens			
	33.8%	48.5%	42.1%
Median Earnings:			
Male	27,966	48,907	34,648
Female	27,901	32,207	27,904
At or below Poverty Level:			
	28.8%	10.6%	17.7%
Housing-type			
Owner-occupied:	43%	61.4%	56.3%
Renter-occupied:	57%	38.6%	43.7%

Source: 2005-2009 American Community Survey

MAP 10



MAP 11



Disability

About 14 percent of the population has some disability, exceeding the percentage in St. Louis County (11%) (2009 ACS).

Of the working age population, about 13 percent are disabled, well above St. Louis County's 9 percent population of working-age disabled persons. There is an even larger discrepancy when comparing the population over 65. The estimated number of disabled elders soars to almost 44 percent of all elderly persons in the City, compared to 33 percent in the County (see **Table 5**). This creates a large challenge for the municipality to address the needs of an older population that shows significant rates of disability.

Table 5
Percent of Disability by Type in the City of St. Louis

	Disabled Population from 18 to 64	Disabled Population 65 and Over
With any disability	13.4%	43.7%
With a hearing disability	1.6%	13.3%
With a vision disability	2.3%	8.7%
With a cognitive disability	6.8%	10.7%
With an ambulatory disability	7.2%	30.0%
With a self-care disability	2.7%	11.5%
With an independent living disability	5.1%	21.9%

Source: 2009 American Community Survey 1-Year Estimate

Sexual Orientation and Gender Identity

Sexual orientation and gender identity are protected classes in the City of St. Louis though not at the federal level. However, effective March 5, 2012, HUD issued a rule that everyone should have equal access to housing in HUD programs regardless of sexual orientation or gender identity.

It is estimated that the City of St. Louis contains a large lesbian, gay, bisexual, and transgender (LGBTQ) population. The Census Bureau does not ask a person's sexual orientation or gender identity in either the decennial census or its annual American Community Survey program. The Census does count same sex couple households, however. In that metric, the City has 14.06 per 1,000 households that report to be same sex couples, according to a study by the Williams Institute of the University of California, Los Angeles that analyzed and refined the latest 2010 Census data. St. Louis ranked at #11 in the proportion of same sex couple households among large U.S. cities. While same sex couple households do not represent the entire LGBTQ population, it is nevertheless clear that the City of St. Louis is home to many LGBTQ residents.

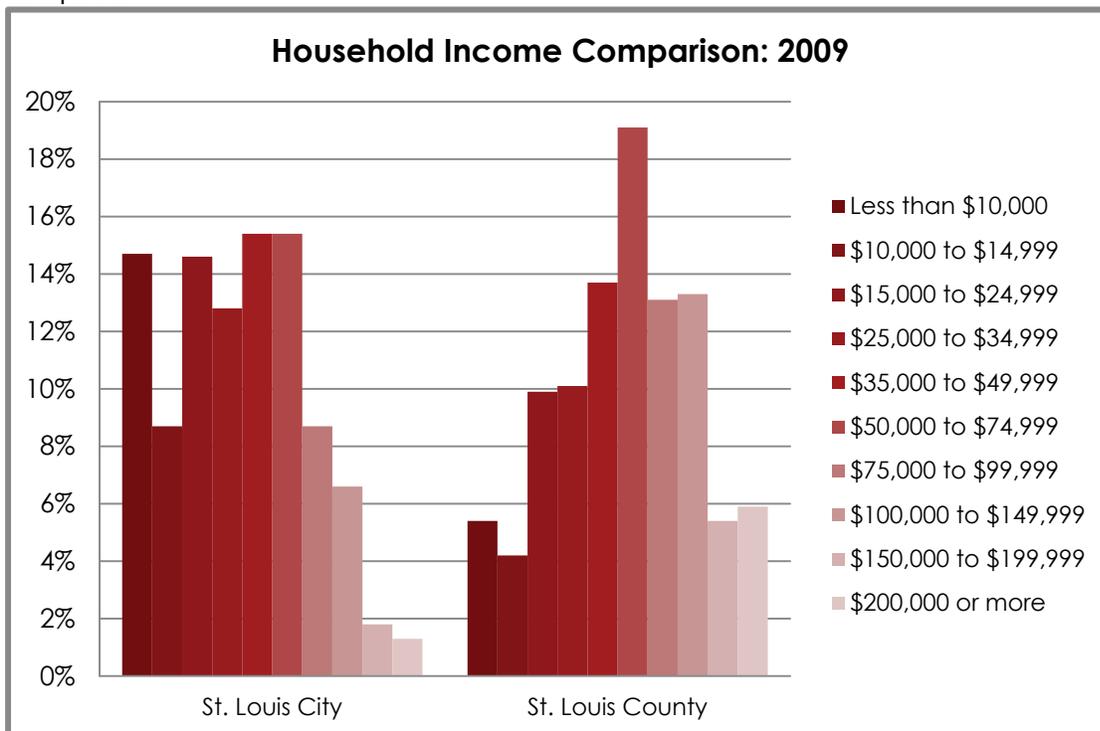
The Civil Rights Enforcement Agency (CREA) received just three complaints of discrimination due to sexual orientation and gender identity over the past three years. City residents who are LGBTQ may feel reluctant to report their complaints due to the need to disclose their sexual orientation or gender identity, both of which can serve as grounds for termination in employment settings outside of the City of St. Louis and several other regional jurisdictions. To address potential discrimination against LGBTQ residents, CREA has reached out to a variety of local St. Louis organizations and publications, including SAGE Metro St. Louis, a not-for-profit organization that provide services and advocacy for gay, lesbian, bi-sexual and transgender elders. CREA and SAGE will work together to provide education and form partnerships so that discrimination can be better reported and addressed. In addition to SAGE, CREA has reached out to the Vital Voice, In the Lyfe, and Black Pride in order to ensure that LGBTQ residents are aware of their rights. Further, HUD should continue to advertise its new rule regarding LGBTQ status and gender identity so that these members of the community know their fair housing rights.

Income

Income is one of the greatest determinants of housing access. In this measure, St. Louis ranks well below its surrounding state and its suburbs. According to the 2005-2009 ACS, the median household income in the City of St. Louis is \$34,227, considerably less than the median income for the entire state of Missouri of \$46,005 and far less than the median income for St. Louis County of \$57,502. The table below highlights the disparity in income between the City of St. Louis and St. Louis County. In the City, 38% of households earn less than \$25,000 per year whereas in the County 19.5% of households earn less than \$25,000 in the County. The disparity is even greater at the upper end of the income spectrum. For example, 24.6% of households in St. Louis County earn more than \$100,000 compared to 9.7% in St. Louis City.

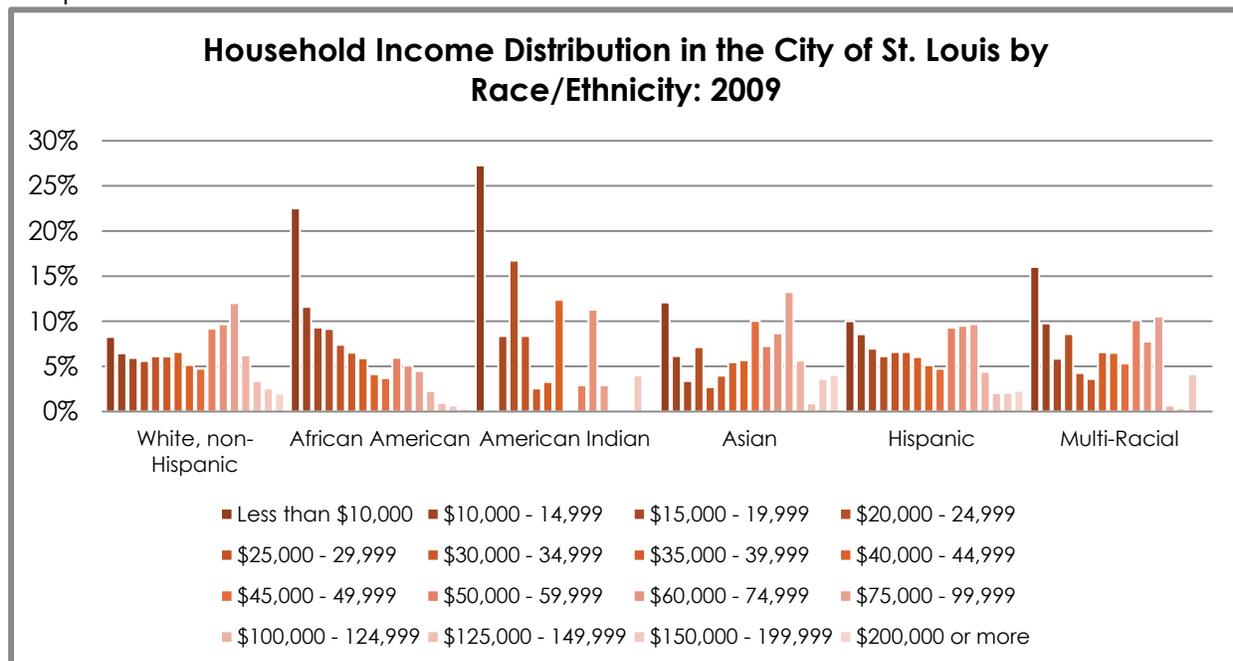
In **Graph 3**, St. Louis City's "income pyramid" is heavily slanted toward the left, or lower income side. St. Louis County's is much more balanced, with the majority of household income falling within middle ranges.

Graph 3



This income distribution has an impact on the demand for low income housing. This demand is especially high for minorities. **Graph 4** demonstrates the variance of household income between different races and ethnicities. African Americans and American Indians have a much higher percentage of the population living with very low incomes.

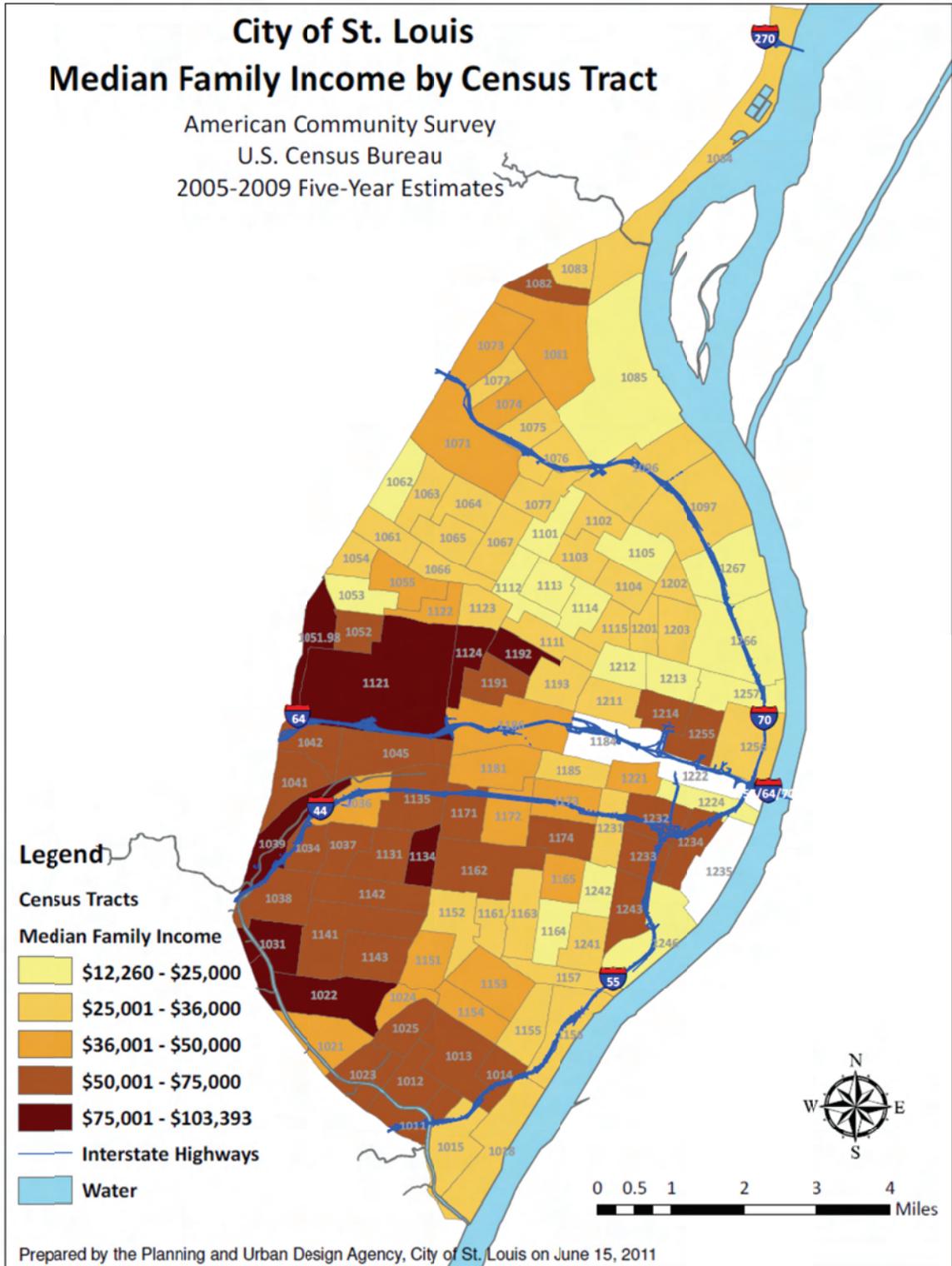
Graph 4



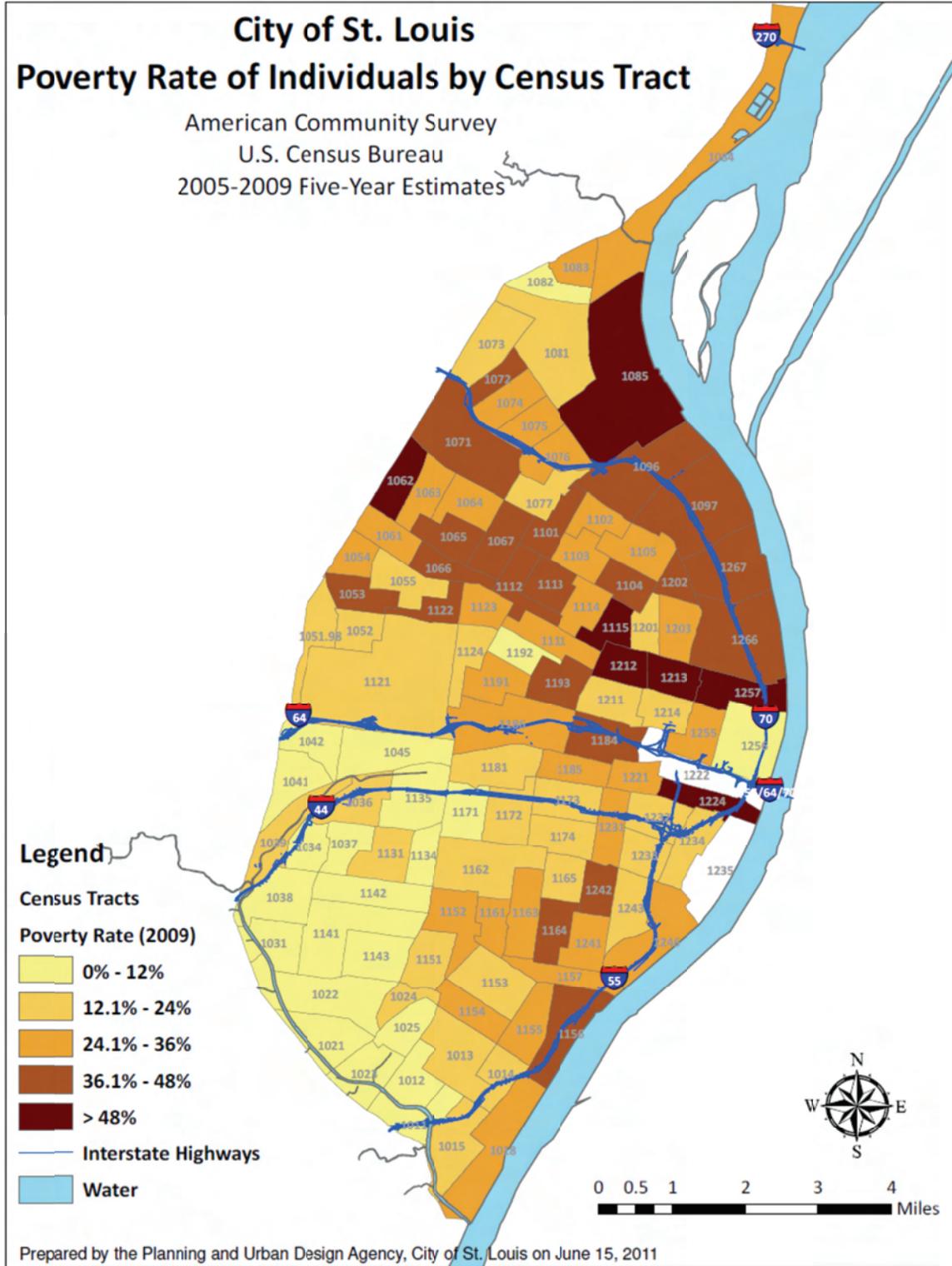
Map 12 shows Median Family Income across the City of St. Louis. Family income differs from household income in that the measure of families includes only those households with two or more members related by blood or marriage—often signifying higher income potential than a single-person household. Per the 2010 Census, family households now comprise less than half of the city's total households. Median family income is highest in the central corridor surrounding Forest Park; southwest St. Louis (e.g., the St. Louis Hills neighborhood); and the Near South Side of the city (e.g., Soulard and Lafayette Square). Areas with the lowest median family income include neighborhoods of primarily subsidized housing such as Carr Square, a pocket of north-central neighborhoods including the Ville and neighborhoods nearest to the North Riverfront including Hyde Park.

Map 13 shows the distribution of individuals living at or beneath the poverty line in the City of St. Louis. Unsurprisingly, those census tracts that contain concentrations of subsidized or assisted housing are among the poorest in the city (Carr Square and Columbus Square just north of downtown as well as King Louis Square/Peabody complex just south of downtown). The neighborhoods in the north central portion of the city (including, for example, the Greater Ville) are also among the City's poorest. On the South Side, the census tracts included in the neighborhoods of Benton Park West, Gravois Park, and Dutchtown South report the highest rates of poverty. South of Forest Park and west of Kingshighway, poverty is at lower rates, almost uniformly falling within the lowest category, less than 12%. All of these neighborhoods, then, have lower poverty rates than the national poverty rate recorded by the 2009 ACS: 14.3%.

MAP 12



MAP 13



Employment

According to the 2005-2009 ACS, there are 107,151 adults employed in the City of St. Louis. The occupations most represented among the population are healthcare and social assistance (16%), educational services (10%), and the retail trade (10%).

The earning capacity of occupations is a key indicator of ability to afford decent housing. The second most common combined occupational category, representing 11.8% of all civilian employees in the City of St. Louis, is "Arts, entertainment, and recreation/accommodation and food services," and it has the lowest median earnings (\$15,775). The three occupational categories with the highest median earnings account for less than 1% of the employed population of the City.

Table 6 demonstrates the need for the City to attract moderate and high wage jobs, as well as to educate its residents well enough to assume such positions.

Ultimately, the type of intervention necessary to produce these changes will be regional in scope and will involve the public and private sector. Fortunately, recently, the City of St. Louis and St. Louis County formed the Economic Development Partnership, which may help to better leverage these jurisdictions' collective resources to attract high quality jobs for the region. The St. Louis Economic Development Partnership is a collaboration between the economic development agencies of the City of St. Louis and St. Louis County and the private sector, working to align and advance economic development efforts across the region. The Partnership has developed a strategic plan to guide the region's efforts along six strategic areas of focus:

- Growing and retaining jobs and capital investment
- Supporting startups and the entrepreneurial community
- Increasing foreign trade and investment
- Advancing redevelopment of strategic real estate assets
- Accelerating the growth rate of the region's foreign born population
- Aligning the region's talent with business needs

The strategic plan recognizes that efforts in these areas will help to grow economic prosperity and access to jobs throughout St. Louis, and identifies key tactics to make progress and improvements among each of them.

Table 6
Occupations

Subject	Total	Percent in Occupation	Median earnings (dollars)
Civilian employed population 16 years and over	159,969		28,003
Agriculture, forestry, fishing and hunting, and mining:	487	0.3%	39,977
<i>Agriculture, forestry, fishing and hunting</i>	385	0.2%	37,616
<i>Mining, quarrying, and oil and gas extraction</i>	102	0.1%	59,449
Construction	7,482	4.7%	29,486
Manufacturing	14,225	8.9%	33,584
Wholesale trade	4,032	2.5%	36,484
Retail trade	16,306	10.2%	20,406
Transportation and warehousing, and utilities:	7,614	4.8%	35,213
<i>Transportation and warehousing</i>	6,571	4.1%	33,301
<i>Utilities</i>	1,043	0.7%	51,838
Information	4,305	2.7%	41,469
Finance and insurance, and real estate and rental and leasing:	10,161	6.4%	34,628
<i>Finance and insurance</i>	7,067	4.4%	35,787
<i>Real estate and rental and leasing</i>	3,094	1.9%	31,269
Professional, scientific, and management, and administrative and waste management services:	17,383	10.9%	31,635
<i>Professional, scientific, and technical services</i>	9,837	6.2%	42,358
<i>Management of companies and enterprises</i>	269	0.2%	55,982
<i>Administrative and support and waste management services</i>	7,277	4.6%	18,194
Educational services, and health care and social assistance:	41,909	26.2%	27,379
<i>Educational services</i>	16,025	10.0%	33,095
<i>Health care and social assistance</i>	25,884	16.2%	24,970
Arts, entertainment, and recreation, and accommodation and food services:	18,852	11.8%	15,775
<i>Arts, entertainment, and recreation</i>	4,304	2.7%	20,964
<i>Accommodation and food services</i>	14,548	9.1%	15,024
Other services, except public administration	8,251	5.2%	22,368
Public administration	8,962	5.6%	39,852

Source: 2005-2009 American Community Survey

Education

Of the adult population, about 80 percent have a high school education or higher, and about a quarter of the population has a bachelor's degree or higher. When compared to St. Louis County, the educational attainment is less at every level, except for high school graduate. However, it is important to note that strides have been made in educational attainment in the City. In almost every category of educational attainment there is improvement since 2000 (see **Table 7**). The percent of the population from 18 to 24 years old that has less than a high school diploma has dropped 7 points since 2000. A Brookings Institution analysis of 2009 American Community Survey data showed that the City of St. Louis had one of the highest rates of growth in the nation of individuals with a bachelor's degree or higher since 2000. A *CEOs for Cities* report which focused on the core of cities (defined as

the area within a three-mile radius of the city center) found that St. Louis was #1 in the nation for growth of individuals aged 25-34 with a bachelor's degree or higher in this part of the city (+87%)⁷.

Table 7
Educational Attainment Comparison

	St. Louis City 2000	St. Louis City 2009	St. Louis County 2009
18 to 24 years	36,738	34,203	89,038
Less than high school graduate	27.8%	20.6%	15.4%
High school graduate (includes equivalency)	28.6%	31.8%	29.1%
Some college or associate's degree	33.9%	36.6%	41.5%
Bachelor's degree or higher	9.7%	11.1%	13.9%
25 years and over	221,951	238,902	666,972
Less than 9th grade	9.6%	6.8%	3.3%
9th to 12th grade, no diploma	19.1%	13.7%	6.3%
High school graduate (includes equivalency)	27.5%	27.4%	23.5%
Some college, no degree	20.5%	20.8%	21.7%
Associate's degree	4.4%	5.8%	6.6%
Bachelor's degree	11.5%	14.9%	23.3%
Graduate or professional degree	7.6%	10.6%	15.2%

Source: U.S. Census Bureau

The impact of the educational disparity is clear when one looks at the median income earned at the different educational attainment levels. In St. Louis City, for persons with less than a high school diploma, the median income is \$16,309, whereas for a person with a bachelor's degree, the median income is \$39,088 (see **Table 8**). Encouraging education is essential for improving incomes which will in turn allow the population to afford decent housing.

Table 8
MEDIAN EARNINGS (IN 2009 INFLATION-ADJUSTED DOLLARS)

	St. Louis City	St. Louis County
Educational Attainment	Median Earnings	Median Earnings
Population 25 years and over with earnings	28,436	38,468
Less than high school graduate	16,309	20,218
High school graduate (includes equivalency)	22,114	27,688
Some college or associate's degree	27,370	34,578
Bachelor's degree	39,088	48,686
Graduate or professional degree	49,738	64,480

Source: 2005-2009 American Community Survey

⁷ El Nasser, Haya, "Urban centers draw more young, educated adults". *USA Today*. 1 April 2011. Accessed online 15 July 2011. < http://www.usatoday.com/news/nation/2011-04-01-1Ayoungrestless01_ST_N.htm>

Transportation

Transportation is a critical if sometimes overlooked element in the employment-housing-transportation linkage. Without access to reliable, safe, and convenient public transportation, housing options can be severely restricted for those who do not have the ability to purchase and maintain a vehicle. Per the 2009 ACS, 15,306 workers age 16 and up in the City of St. Louis, or 9.7% of the total workforce, did not have access to a vehicle. This portion of the population may become trapped in a cycle of un- or underemployment with no way to pay rent or a mortgage and reach a job that pays a livable wage at the same time. One must also consider that this statistic does not take into account those outside the workforce—who may very well be jobless due to inadequate access to employment opportunities.

Brookings recently released the results of a May 2011 study entitled “Transit and Jobs in Metropolitan America” which analyzed employment accessibility by public transportation in the 100 largest U.S. metropolitan regions. Their findings, representing the entire 2.8 million-person region, are shown below:

Coverage: 57% of the working-age population lives near a transit stop.

- Average of 100 Metropolitan Areas: 69%
- 100% of City residents fall into this category; 50% in the suburbs.
- 82% of low income residents (under 80% Area Median Income, or AMI) in the region live near a transit stop, compared to 52% of middle income (between 80% and 102% AMI) and 42% of upper income (>120% AMI).

Frequency: 11.2 minute median wait for rush hour transit vehicles.

- Average of 100 Metropolitan Areas: 10.1
- In the city, the median wait time is 7.1 minutes; in the suburbs, 12.5.
- Low income individuals in the region have the shortest wait (9.3 minutes), compared to middle income (12.0) and high income (13.9).

Job Access: 24% of the region's jobs are reachable in 90 minutes or less via transit.

- Average of 100 Metropolitan Areas: 30%
- In the city, 38% of jobs are reachable in 90 minutes or less; suburbs, 20%.
- Low income individuals have the highest job access, at 31%; middle income is next with 21%, and upper income is last with 17%.

The Brookings Study⁸ demonstrates that St. Louis's transit network is, at a minimum, assisting the neediest population—low income individuals. Furthermore, the City of St. Louis bests the nationwide averages for all three of the above categories used to determine metropolitan rankings, while its suburbs fall well short. Still, the metric used to determine job access (a 90-minute wait) is a rather low bar at which to judge the efficacy of a transit system. A 90-minute commute is difficult and is far too common an occurrence for transit users, given that jobs are spreading farther from the central core where affordable housing is concentrated. Also, despite the low bar, the percentage of accessible jobs in the region and the City is still low, at 24% and 38%, respectively. Plus, even though almost 40% of the City's jobs are deemed accessible by Brookings, the City's share of regional employment has been decreasing for decades. So, while in percentage terms the city may be performing better than its surrounding peers, the number of jobs that are accessible is continuing to shrink.

⁸ Tomer, Adie; Kneebone, Elizabeth; Puentes, Robert; and Berube, Alan. “Missed Opportunity: Transit and Jobs in America”. *Brookings Institution*. 12 May 2011 URL:

http://www.brookings.edu/reports/2011/0512_jobs_and_transit.aspx

Table 9

Resident Transportation to Work

Transportation Type	St. Louis City	St. Louis County	State of Missouri
Drove Alone	70.5%	83.6%	80.6%
Carpooled	11.9%	7.7%	10.6%
Public Transportation (including taxi)	11.1%	3.0%	2.5%
Walked/Bicycled	4.0%	1.6%	2.2%
Worked at Home	2.5%	4.1%	4.1%

Source: 2005-2009 American Community Survey

The number of jobs accessible by public transportation within the region – often referred to as “jobs housing mismatch” – is a critical issue, so much so that the East West Gateway Council of Governments conducted research into the extent of the challenge. The research study, completed by Lance Huntley, John Posey and Ross Friedman, centered on potential markets for what is often called “workforce housing,” which means housing for low- and moderate-income workers.

When affordable housing is scarce near low-and-moderate paying jobs, workers are forced to commute longer distances to and from work. Often, economically upscale communities have a need for workers who are paid moderately, yet these same communities do not have housing these workers can afford. This mismatch between employment opportunities and housing options places a burden on workers and a strain on the regional economy. The study found that more than 150,000 low- and moderate-income workers in the St. Louis region commute more than 20 miles to work, one way. On such a commute, a car that gets 20 miles per gallon would consume 500 gallons of gasoline in a year. That would cost the driver about \$1,500 per year for gasoline and produce 4.9 tons of carbon dioxide per year.

There are multiple solutions to jobs housing mismatch, which should be pursued simultaneously. One regional solution is to develop affordable housing in suburban and exurban communities where low- and moderate-wage jobs are plentiful and housing costs are high. For the City of St. Louis, the best jurisdictional solutions are to attract more jobs to affordable City neighborhoods and push for investments in public transportation that increase the number of accessible jobs.

Racially/Ethnically Concentrated Areas of Poverty

One of the core goals of affirmatively furthering fair housing is to ensure that low-income households are offered housing choice beyond racially and ethnically concentrated areas of poverty (shown in **Map 14**). Ideally, households should have multiple housing options, including options in “areas of opportunity” which can be defined as areas with access to public transit, employment, social services, retail services, high performing schools, and other public amenities. Recently, OneSTL published a Fair Housing Equity Assessment that published one perspective on areas of opportunity (shown in **Map 15**).

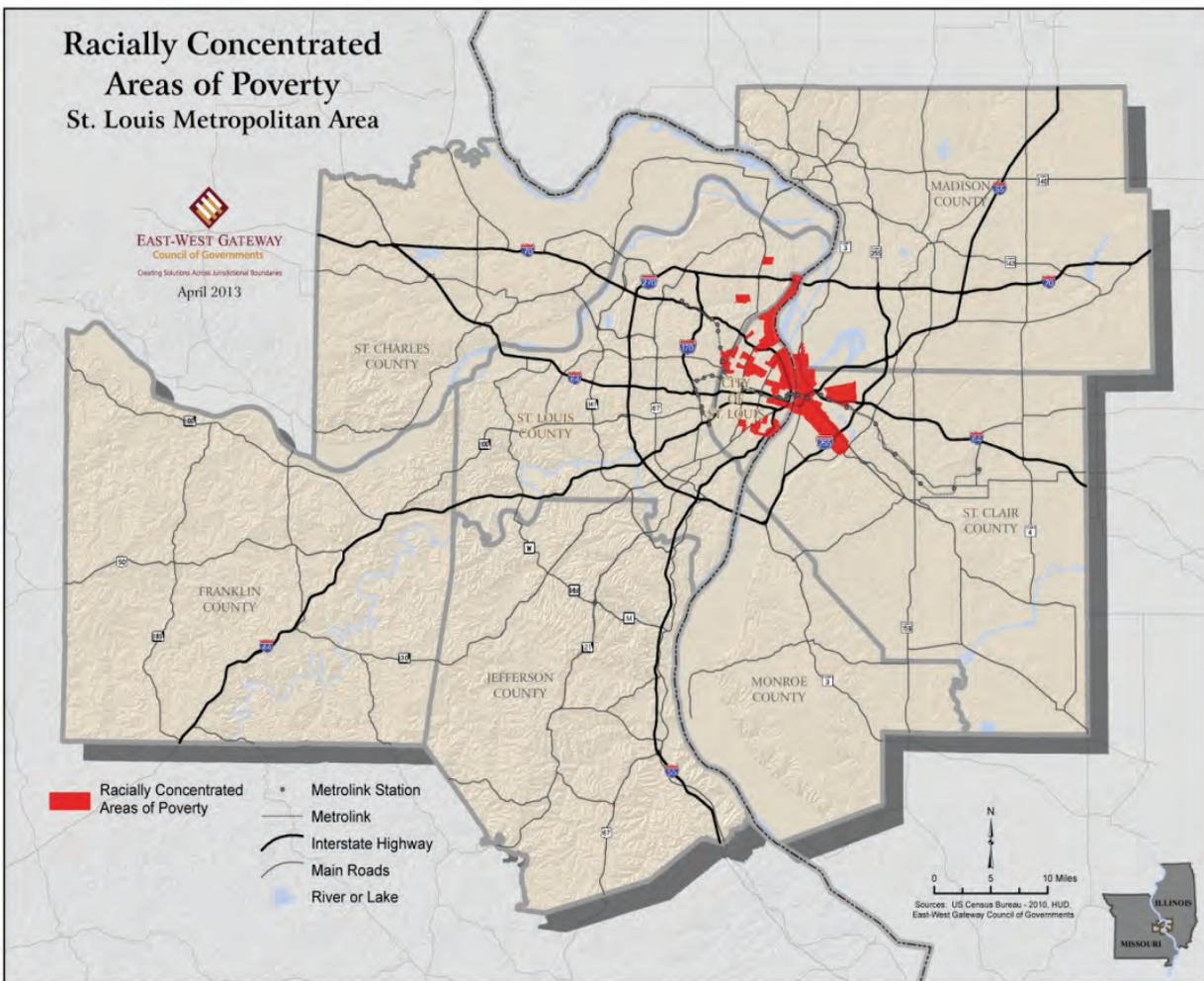
While it is important to have a regional view and approach when addressing fair housing and Areas of Opportunity, it is also important to have an on-the-ground understanding of how poverty and opportunity manifest themselves within individual jurisdictions and communities. Median household incomes, median rents, and other measures can differ greatly as one traverses the 20 miles between St. Louis City and Ballwin/Ellisville. Job opportunities, transit options, and neighborhood amenities that are appealing in Ballwin may not be appealing in St. Louis, and vice versa. In sum, we must continue to improve access to recognized Areas of Opportunity in the greater St. Louis area while understanding that what constitutes an appealing opportunity is largely a contextual issue. Using this contextual understanding, St. Louis will continue to define and demarcate areas with strong and burgeoning opportunities within its city limits so that it may effectively target resources to further developing these areas and increasing access to them.

Additionally, while locating housing in areas of opportunity is an important strategy, rebuilding existing neighborhoods and strengthening the urban core is also critical. Focusing too much on regional areas of opportunity at the expense of current City neighborhoods may limit support in currently impacted areas and exacerbate disparities. A focus on rebuilding the core City as an area with equitable opportunities for all residents is an important, long-term strategy.

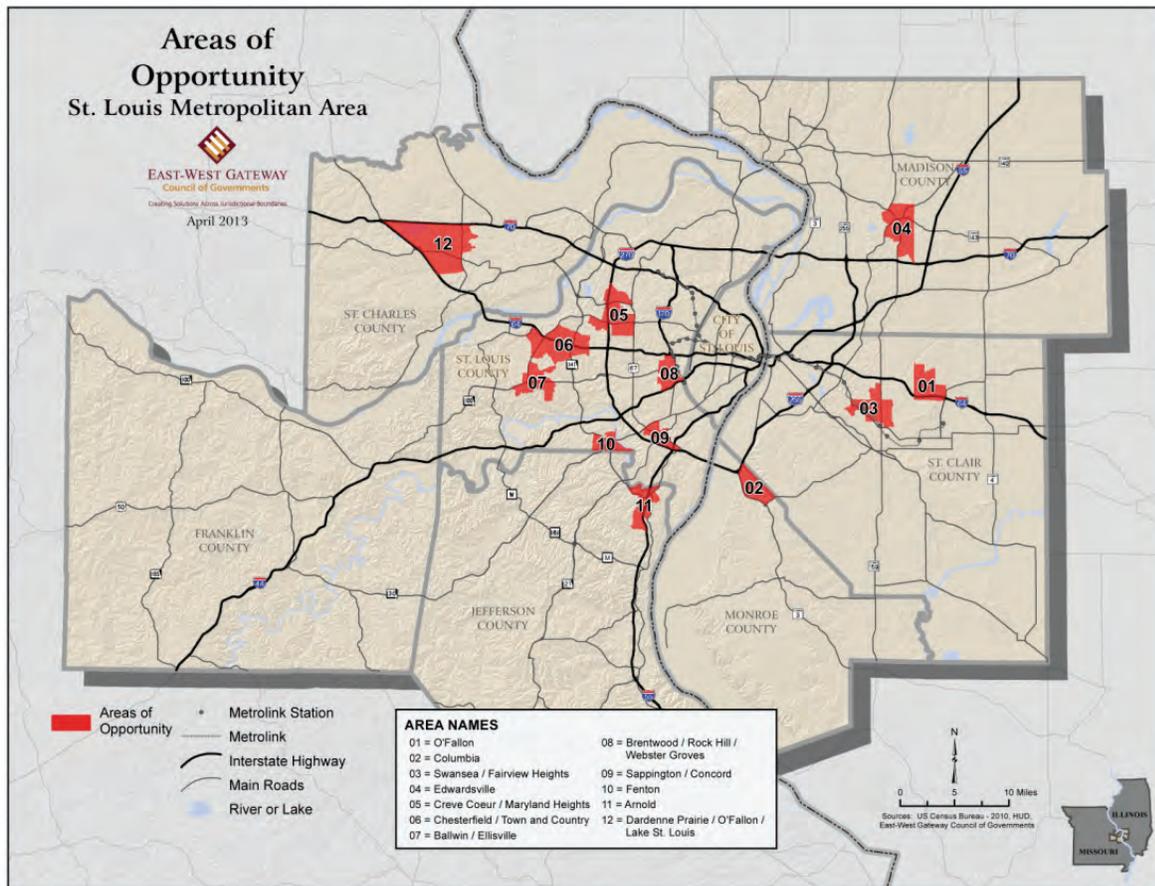
Secondly, while it is shocking to see the inverse relationships between Areas of Opportunity and Racially Concentrated Areas of Poverty (as seen on **Maps 14 and 15**), it is important to remember that this relationship is not a coincidence. Having been in large part shaped by policy decisions at various levels of government, from redlining to interstate highway development and other forms of disinvestment, it is imperative to maximally direct the power of policy to work to remedy this relationship. Doing so requires not only increasing access to current Areas of Opportunity but also working to develop viable opportunities in areas that are currently racially concentrated and are struggling with high rates of poverty. This can and should be done within the city of St. Louis.

Creating new opportunity in high poverty areas is difficult, but current endeavors in St. Louis show that it can be done successfully by building on strengths while addressing areas of weakness. Neighborhoods such as Forest Park Southeast, Old North, and Downtown have seen encouraging growth and investment in recent years, and help to bring stability and opportunity to surrounding communities as well. St. Louis must continue to encourage and support such developments, as well as developing and investing in its resources such as its improving schools, its transit system, and its efforts in economic development, among others.

MAP 14



MAP 15



Demographic Challenges

The City of St. Louis faces challenges to meeting the fair housing needs of its population. Some of the most important challenges that the City faces that impacts Fair Housing due to the demography are:

- Racially and ethnically concentrated areas of poverty
- Large number of segregated neighborhoods, with African Americans often lacking access to services and amenities
- High percentage of low-income households
- Limited employment opportunities with good wages
- High percentage of residents without a high school diploma
- Larger percentage of disabled residents creating a greater need for accessible housing

Putting the Jurisdiction in Perspective

In the section below, St. Louis is compared to 12 peer cities selected for their geographic proximity, relatively similar size, similar economic composition, or all of the above. The variables selected reflect some of the most important information about the health of a place, relating mostly to income and education.

Data derives from the 2009 ACS, which provides information on all places with over 65,000 people. Therefore, in addition to the 12 selected cities, St. Louis is compared to the median of all 533 places that met this population threshold as of 2009.

Arguably, St. Louis faces its most severe impediment to fair housing choice in the form of poverty.

Table 10

Individuals in Poverty		
Comparison Cities	%	RANK (of 533)
Detroit, MI	36.4	4
Cleveland, OH	35.0	12
Buffalo, NY	28.8	37
Milwaukee, WI	27.0	46
<i>St. Louis, MO</i>	26.7	51
Memphis, TN	26.2	58
Cincinnati, OH	25.7	61
New Orleans, LA	23.8	75
Pittsburgh, PA	23.1	84
Columbus, OH	22.6	100
Baltimore, MD	21.0	136
Indianapolis, IN	20.2	154
Kansas City, MO	16.7	246
MEDIAN OF PLACES OVER 65,000	15.7	N/A

St. Louis ranks 51 out of 533, with 26.7% of individuals living at or beneath the poverty line. With over a quarter of residents living in poverty, housing choice is by default limited.

Worse still, St. Louis ranks even higher—27th—in the measure of children living at or below the poverty line. St. Louis nearly doubles the median value for all cities (21.1%).

Table 11

Child Poverty		
Comparison Cities	%	RANK (of 533)
Cleveland, OH	51.3	7
Detroit, MI	50.8	8
Buffalo, NY	45.7	13
<i>St. Louis, MO</i>	41.6	27
Memphis, TN	40.2	30
Milwaukee, WI	39.4	34
Cincinnati, OH	36.8	49
New Orleans, LA	34.6	68
Pittsburgh, PA	33.9	71
Columbus, OH	32.9	82
Indianapolis, IN	29.8	122
Baltimore, MD	29.6	129
Kansas City, MO	25.4	201
MEDIAN OF PLACES OVER 65,000	21.1	N/A

St. Louis again ranks in the Top 50 in percentage of family households earning less than \$35,000 per year. The city ranks in the bottom half for the percentage of family households earning more than \$100,000 (15.7%), but is significantly higher in terms of percentage than several of its peers, including Cleveland with just 6.3%.

Table 12

Family Households Earning < \$35,000			Family Households Earning > \$100,000		
Comparison Cities	%	RANK (of 533)	Comparison Cities	%	RANK (of 533)
Detroit, MI	55.1	5	Cleveland, OH	6.3	525
Cleveland, OH	55.1	5	Detroit, MI	6.6	523
Buffalo, NY	48.4	23	Milwaukee, WI	11.6	477
Milwaukee, WI	45.4	36	Buffalo, NY	14.4	423
<i>St. Louis, MO</i>	44.1	46	Memphis, TN	14.5	420
Memphis, TN	43.7	50	<i>St. Louis, MO</i>	15.7	403
New Orleans, LA	42.7	54	Columbus, OH	17.5	365
Cincinnati, OH	40.4	72	Cincinnati, OH	18.2	352
Baltimore, MD	38.0	101	Indianapolis, IN	18.3	350
Indianapolis, IN	35.5	132	Baltimore, MD	18.7	342
Columbus, OH	34.5	146	New Orleans, LA	18.8	333
Pittsburgh, PA	34.4	150	Pittsburgh, PA	19.0	327
Kansas City, MO	32.2	198	Kansas City, MO	21.0	290
MEDIAN OF PLACES OVER 65,000	28.4	N/A	MEDIAN OF PLACES OVER 65,000	22.2	N/A

Compared to peer cities, St. Louis does not rank as poorly in the percentage of the population 25 and over with less than a high school education as their highest level of educational attainment. Situated at #181, it is in the top half and has a somewhat high percentage (17.4%), but is not as distant from the median (14.1%) as in other measures.

Table 13

Less than High School Education (25 years+)		
Comparison Cities	%	RANK (of 533)
Cleveland, OH	24.2	70
Detroit, MI	23.0	86
Baltimore, MD	19.7	134
Milwaukee, WI	19.4	138
Buffalo, NY	18.9	154
Memphis, TN	18.8	157
<i>St. Louis, MO</i>	17.4	181
Indianapolis, IN	16.8	196
Cincinnati, OH	16.6	202
New Orleans, LA	16.1	213
Kansas City, MO	14.0	272
Columbus, OH	12.4	320
Pittsburgh, PA	10.6	362
MEDIAN OF PLACES OVER 65,000	14.1	N/A

Housing Profile

Population and Housing

In addition to the City's population loss in the last decade, there was also an overall loss in housing units. The following table shows that the population decline is shadowed by loss of total housing units. The table shows a loss of more than 62,000 housing units over the last 40 years. However, in the last ten years, there has been a reduction in the rate of loss.

Table 14
Population and Housing in the City of St. Louis (1970-2010)

	1970	1980	1990	2000	2010
Total Population	622,236	453,085	396,685	348,189	319,294
Population loss	n/a	(169,151)	(56,400)	(48,496)	(28,895)
Percent lost	n/a	-27%	-12%	-12%	-8%
Total Housing Units	238,485	202,113	194,919	176,354	176,002
Housing Units loss	n/a	(36,372)	(7,194)	(18,565)	(352)
Percent lost	n/a	-15%	-4%	-10%	-0.2%

Source: U. S. Census Bureau

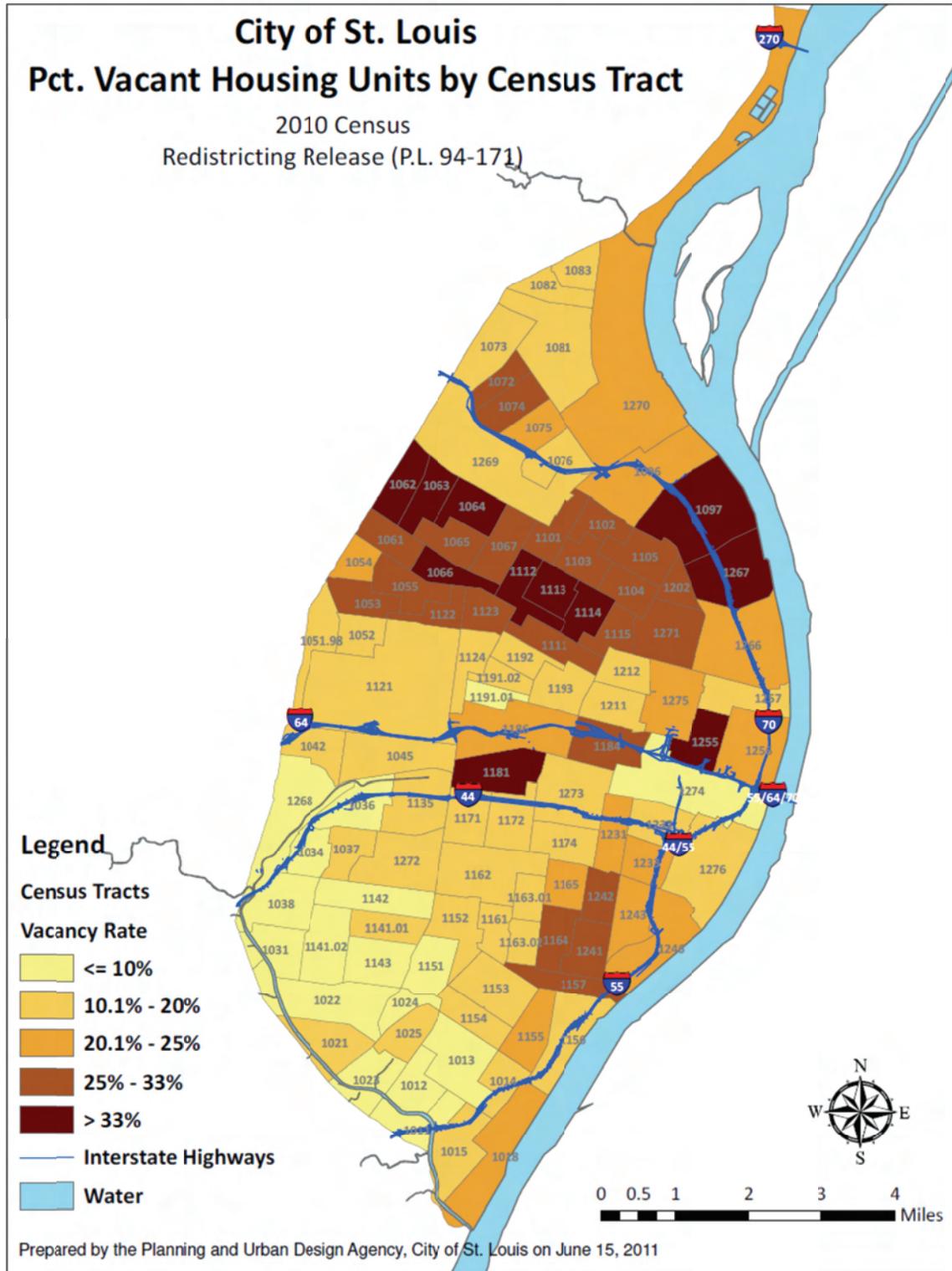
The 2010 Census recorded that there are 176,002 total housing units with 142,057 of those units occupied. This represents a continued decrease in both total housing and occupied housing, but an increase in the vacancy rate. To compare, the vacancy rate in St. Louis County is 8 percent. Given that the population decrease was more significant than the drop in total housing units, it is not surprising that the percentage of vacant housing increased in the last decade.

Table 15
Occupancy Rates in the City of St. Louis

	1970		1980		1990		2000		2010	
Occupied housing units	215,479	90.4%	178,048	88.1%	164,931	84.6%	147,076	83.4%	142,057	79.3%
Vacant housing units	23,006	9.6%	24,065	11.9%	29,988	15.4%	29,278	16.6%	33,945	20.7%

Source: 2010 Census

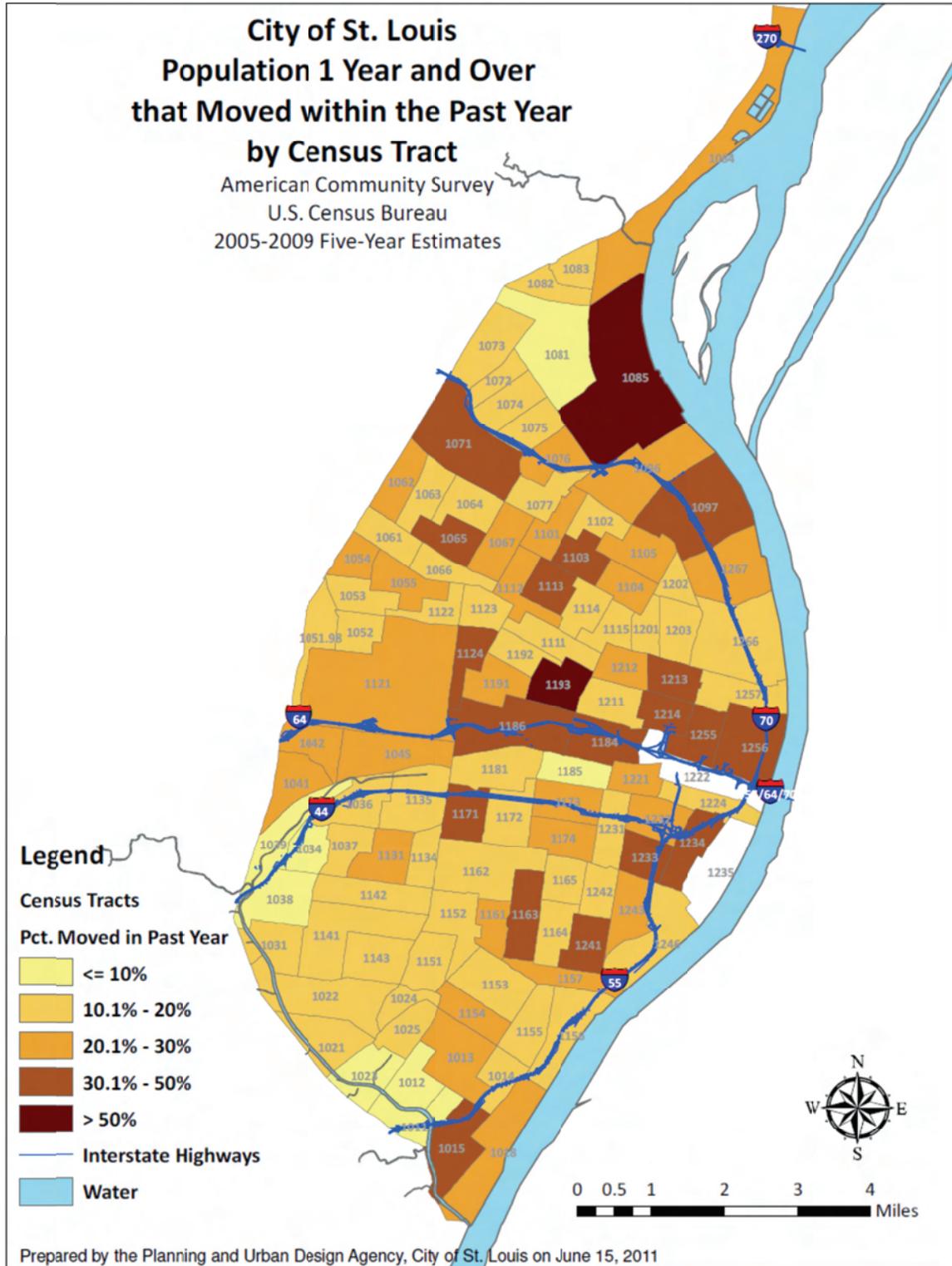
MAP 16



MAP 17

City of St. Louis Population 1 Year and Over that Moved within the Past Year by Census Tract

American Community Survey
U.S. Census Bureau
2005-2009 Five-Year Estimates



Owner-Occupied Housing

The 2010 Census shows a decline in homeownership in both total number and as a percentage of occupied housing. This was expected with the lending crisis of 2008 and an increased number of foreclosures since that time.

Table 16
Owner Occupancy Rates

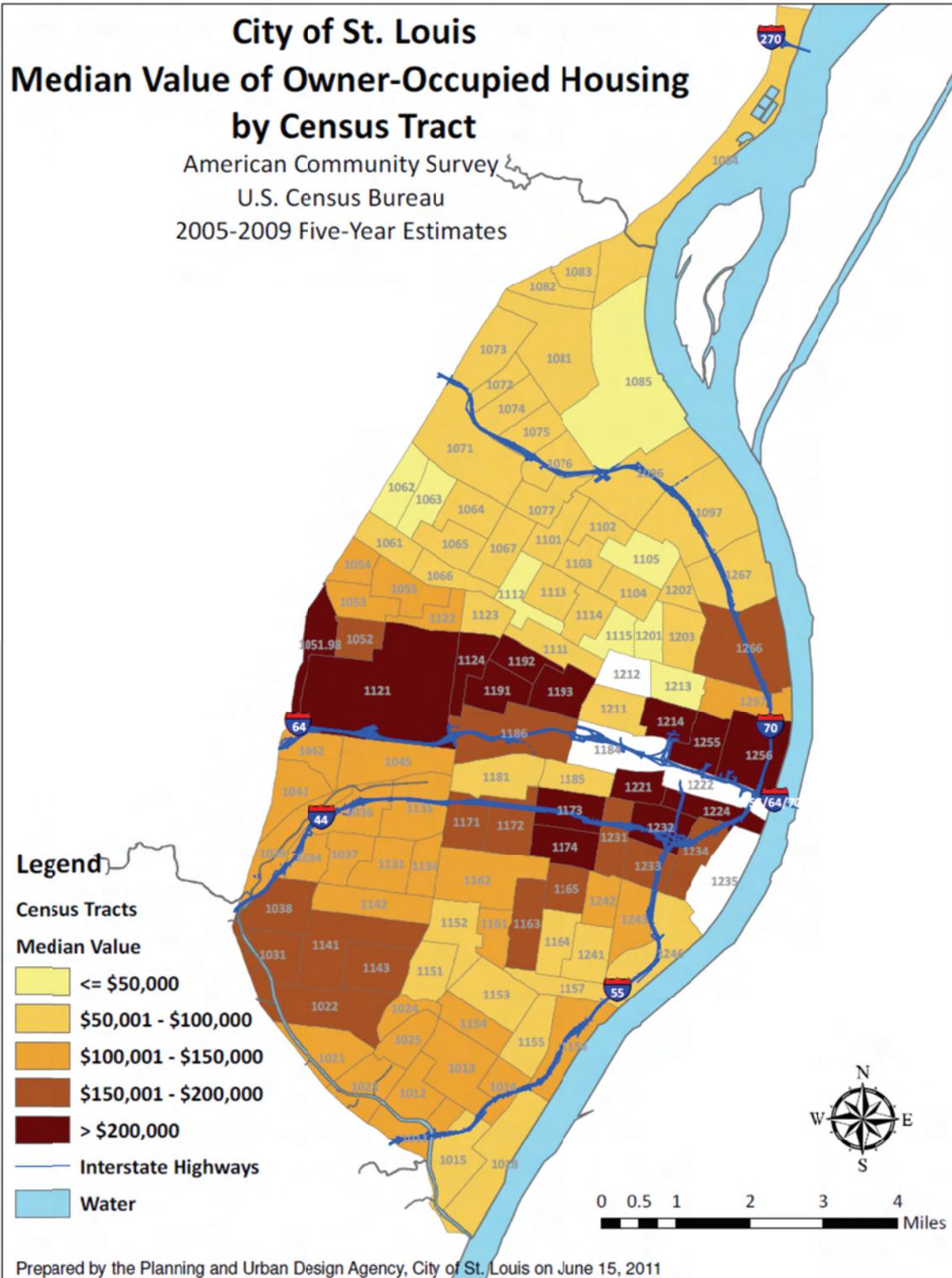
	1970		1980		1990		2000		2010	
Owner-Occupied Housing Units	87,291	40.5%	80,415	45.2%	74,352	45.1%	68,939	46.9%	64,425	45.4%

Source: 2010 Census

The 2009 ACS estimate reported the median monthly housing payment is \$942, which is seemingly a large increase over the median housing payment of \$750 in 2000. However, when inflation is accounted for, the payment is virtually unchanged - \$750 in 2010 dollars is \$940. The median value of owner occupied housing is \$132,100. The median income of households that own their home is \$50,678.

Map 16 shows that the Central Corridor's owner-occupied housing is among the most valuable in the City. Most census tracts encompassing Downtown and the Central West End report median house values above \$200,000 according to the 2005-2009 ACS. In addition, Compton Heights and Lafayette Square on the South Side match these high marks. Neighborhoods not quite reaching the \$200,000 mark but clocking in above \$150,000 include Benton Park, Shaw, Soulard, Tower Grove East, Tower Grove South, and a cluster of neighborhoods in the southwestern portion of the city.

MAP 18



Lending

The 2008 foreclosure crisis hurt St. Louis homeowners and constricted borrowing opportunities for low- and middle-income St. Louis residents as lending institutions struggled to recover from poor investment choices. Subprime and predatory lending practices had led to the collapse of these institutions' finances, causing them to vigorously pursue foreclosures in an attempt to keep their businesses afloat. According to popular foreclosure tracking web site RealtyTrac, as of March 2011 the City still had a high number of foreclosures with a rate of 1 out of every 651 mortgages being foreclosed. As a comparison, a low number of foreclosures is considered to be 1 out of every 150,000 mortgages. This situation, combined with the effects of the Great Recession, placed a significant housing cost burden on many low- and middle-income residents of St. Louis.

It is also important to consider lending availability and the racial disparity between the rates of homeownership among African Americans and whites. As Table 17 below shows, based on 2013 American Community Survey data, 56.1% of housing units occupied by white, non-Hispanic households are owner-occupied units. This is a significantly greater owner occupancy percentage than other racial groups – African American, American Indian, Asian, and Hispanic-headed households are far more likely to occupy rental units.

Disparities in homeownership rates are understood in part by the racial income disparities. However, a report produced by the Metropolitan St. Louis Equal Housing Opportunity Council in February 2011 raised the question about equal access to lending. In the report, "Redlined: A Fair Lending Analysis of the St. Louis Metropolitan Area", the Council found a lack of access to lending for minority borrowers and in predominantly minority communities. Lending decreased 68% in areas where the minority population was more than 80%, but increased 24% in areas that had less than 10% minority population. Likewise, lending to African Americans decreased nearly 50% but increased by 22% to white borrowers. Access to lending is essential to improve homeownership rates for African Americans.

Table 17

Owner Occupied Housing by Race

Race	Percent of Total Population	Number Housing Units Occupied	Percent Owner Occupied	Percent Renter Occupied
White (non-Hispanic)	42.7%	70,556	56.1%	43.9%
African American	48.6%	63,206	32.9%	67.1%
American Indian	0.2%	360	31.4%	68.6%
Asian	2.8%	3,581	36.8%	63.2%
Hispanic	3.6%	3,886	34.4%	65.6%

Source: 2013 American Community Survey

Rental Housing

The percentage of rental housing shows a decrease over the 2000 housing market. The types of rental housing in the City of St. Louis vary widely from single-family detached rental housing to high-rise apartment buildings with more than 50 units.

Table 18

Renter Occupied Property by Decade

	1970	1980	1990	2000	2010					
Renter-Occupied Housing Units	128,188	59.5%	97,633	54.8%	90,579	54.9%	78,137	53.1%	77,632	54.6%

Source: U.S Census Bureau

Table 14 shows a decrease in the number of renter occupied units, but an increase in the percentage renter occupancy. This is indicative of the overall population decline and concurrent housing unit loss through demolition and abandonment, but it also indicates a trend toward renting.

Table 19
Rental Properties by Type

Renter Occupied		72,231
Single Family, detached	16.0%	11,557
Single Family, attached	3.7%	2,673
2 apartments	19.7%	14,230
3 - 4 apartments	23.0%	16,613
5 - 9 apartments	9.5%	6,862
10 + apartments	27.8%	20,080
mobile home/other	0.3%	217

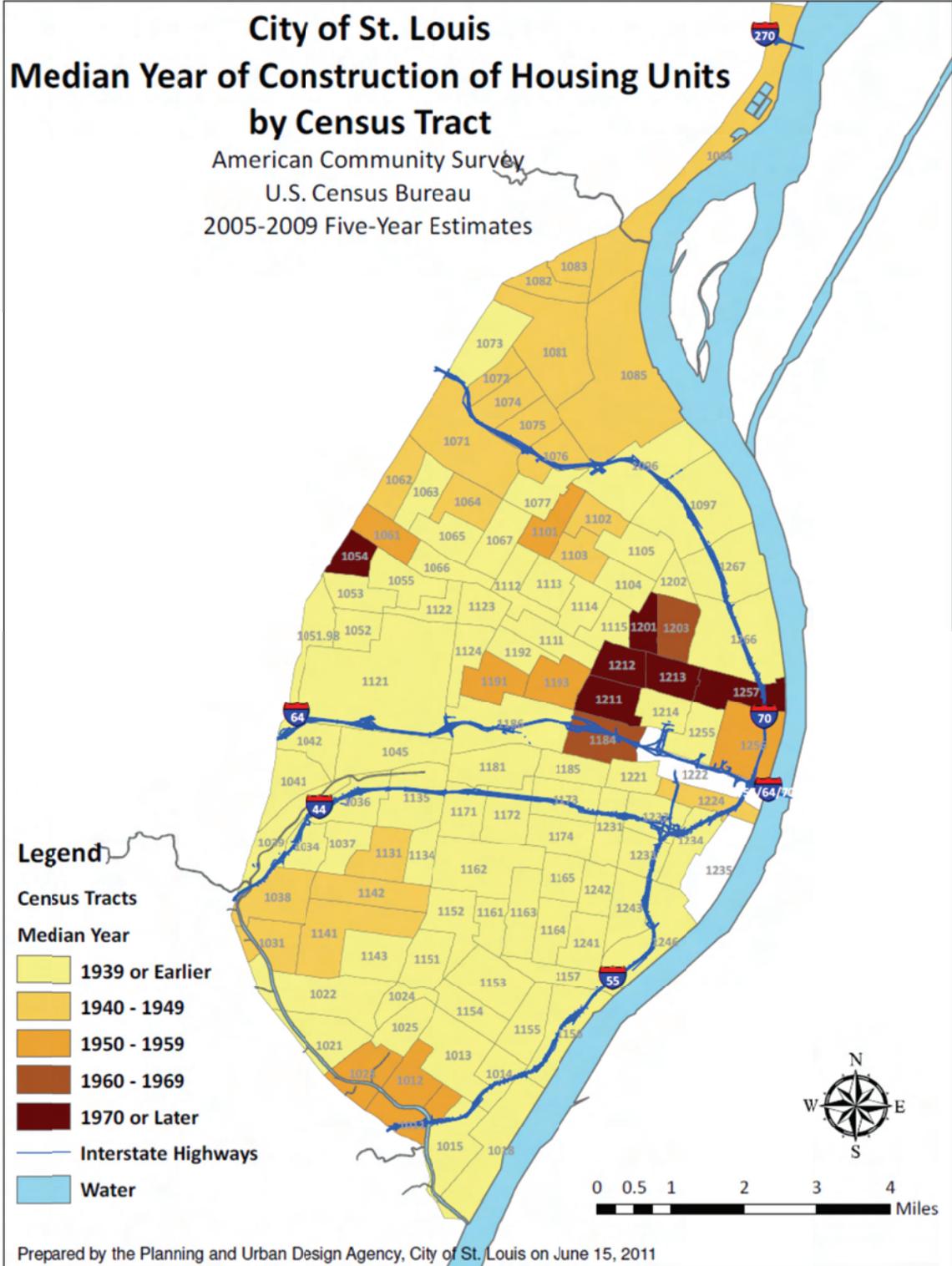
Source: 2005-2009 ACS

Age of Housing Stock

The housing stock in the City of St. Louis is aging. Most of the homes were built prior to 1939 (see **Map 17**). This can create a larger burden of home maintenance expense, especially if older housing stock is owned by lower income residents. In addition, an aging housing stock may not meet the needs of modern families, including persons with disabilities.

Table 20
Age of Housing Stock

1939 or earlier	1940-1959	1960-1979	1980s	1990s	2000s
56.5%	23.0%	11.4%	3.6%	2.3%	3.1%



Housing Cost

Housing costs in the City of St. Louis are relatively low compared to the rest of the metropolitan area. The median cost of an owner-occupied home with a mortgage is \$132,100, according to the 2005-2009 ACS. The median rental rate is \$636 which is up from \$442 in 2000, and seems to be a substantial increase. When adjusted for inflation, the 2000 average would be \$554 in 2010 dollars. This indicates a rising demand for rental properties.

The Affordable Housing Need table below (**Table 21**) is one way of analyzing income and rental data to determine the need for housing. Ideally, households spend no more than 30% of their income on housing. So, a person who earns \$20,000 per year would spend no more than \$500 per month on rent. Households who must pay more than 30% on rent or housing costs are considered housing cost burdened.

Map 18 shows that most of North St. Louis and much of the eastern portion of South St. Louis are areas where renters would be considered cost-burdened. Gross rent accounts for utilities in addition to the contract rent.

The table reflects a great need for housing for the lowest income residents and an over-supply of housing at the upper end of the cost spectrum. In 2000, there was an undersupply of housing at the upper end of the cost spectrum as well. The updated 2010 numbers indicate that the market has addressed the lack of options at the upper end of the cost spectrum.

Table 21
Affordable Housing Need

Income	Households	Monthly Housing Costs	Number of Units	Net
Less than \$10,000	21,028	Less than \$300	12,016	-9,012
\$10,000 - 14,999	12,445	\$300 - 399	10,585	-1,860
\$15,000 - 24,999	20,885	\$400 - 599	29,038	8,154
\$25,000 - 34,999	18,310	\$600 - 799	27,608	9,298

Source: 2005-2009 ACS

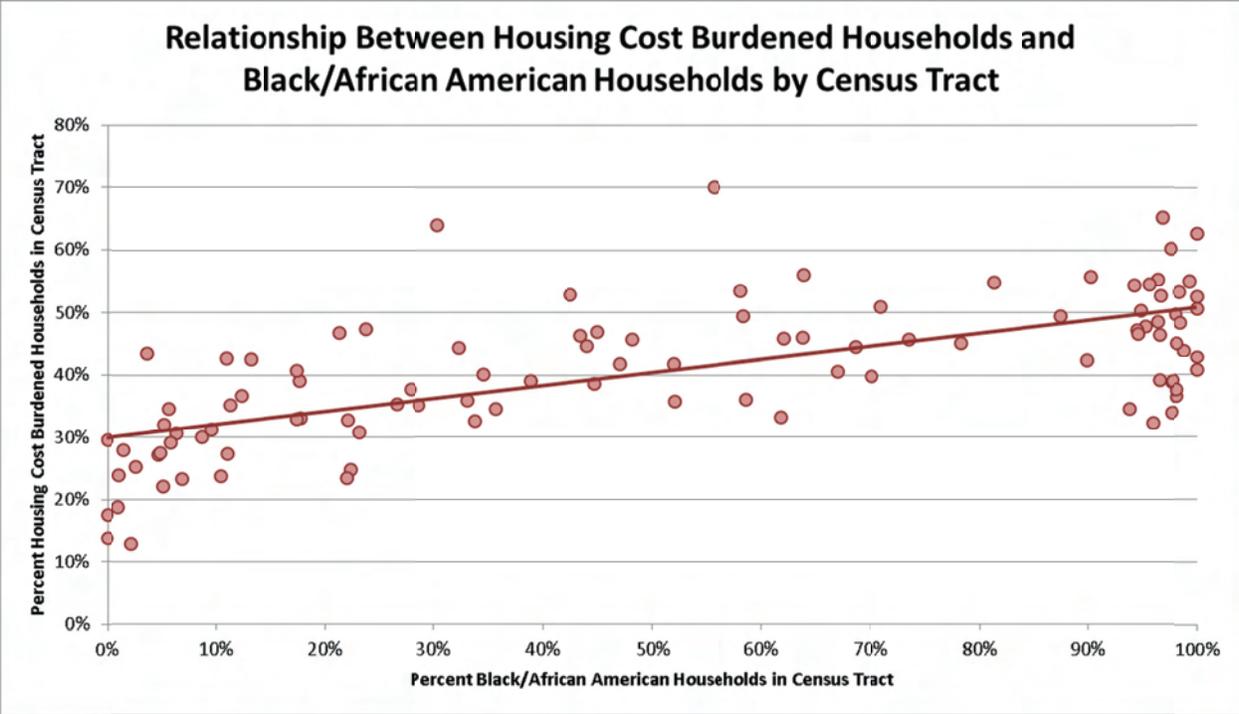
Table 22
Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	85,420	27,010	27,915	2,700
White	51,440	12,115	9,340	765
Black / African American	29,305	13,810	17,380	1,720
Asian	1,600	330	330	74
American Indian, Alaska Native	105	85	30	25
Pacific Islander	40	0	20	0
Hispanic	1,820	385	465	75

Source: Comprehensive Housing Affordability Strategy Data (2006-2010)

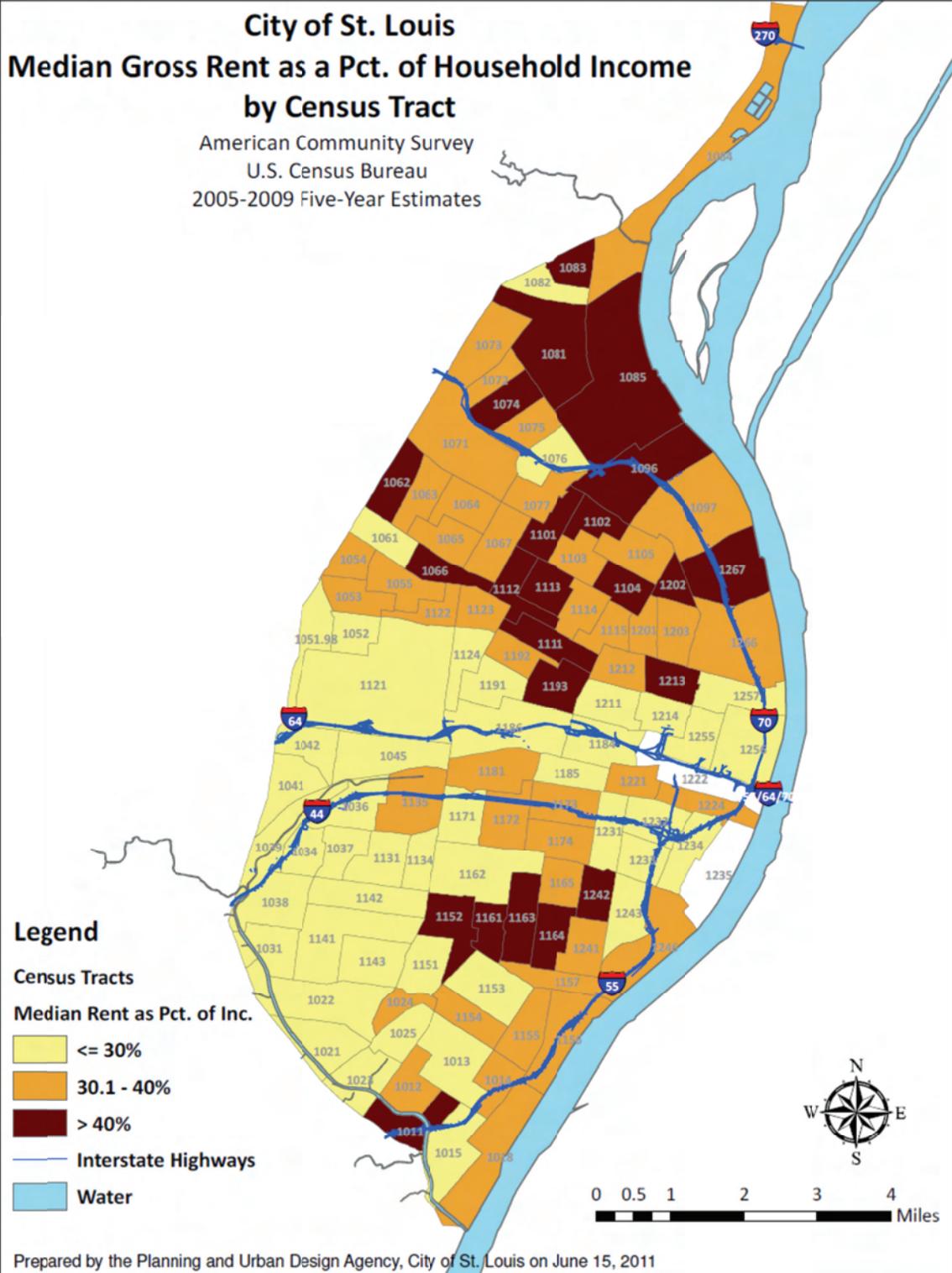
In the City of St. Louis, two groups experience housing cost burden (either housing cost burden between 30% and 50% or severe housing cost burden over 50%) at a disproportionately greater rate: Blacks/African Americans and American Indians/Alaska Natives. In addition, Pacific Islanders experience severe housing cost burden (> 50%) at a disproportionately greater rate. Blacks/African Americans experience severe housing cost burden (>50%) at a rate 9% points higher than the jurisdiction as a whole, which, while not technically meeting the definition of disproportionately greater need, is still a notable disparity.

The disproportionately greater housing cost burden of Black/African American households is particularly notable for two reasons. First, Blacks/African Americans make up approximately half of the total population of the City of St. Louis according to the 2010 Census and there are 31,190 Black/African American housing cost burdened households according to the HUD CHAS data, so there is a high magnitude of need the City of St. Louis must find creative ways to address with limited public subsidy. Second, Black/African American households facing housing cost burden are more likely to be geographically concentrated in Census Tracts with fewer job opportunities, fewer retail options, higher crime rates, weaker housing markets, and poorer health outcomes. As is demonstrated in the following chart, Census Tracts with high percentages of Black/African American households are likely to be Census Tracts with high percentages of housing cost burden, which may ultimately create broader neighborhood effects that disproportionately burden Black/African American households regardless of their specific housing cost burden status.



While the disparities faced by American Indians/Alaska Natives and Pacific Islanders need careful attention, it is also important to note that the population belonging to these two racial and ethnic groups makes up a relatively small portion of the City of St. Louis population as a whole, and thus these disproportionately greater needs must be addressed as one component of a comprehensive strategy that considers all the housing needs of the population.

MAP 20



Housing Needs of Specific Household Categories

The Department of Housing and Urban Development (HUD) defines low- to moderate-income (LMI) households as households with an income below 80% of the area median income. Within that category, there are three income levels as follows:

- Extremely low-income households, which are households with an annual income **below 30% of the MSA median income**
- Low-income households, which are households with an annual income between **30-50% of the MSA median income**
- Moderate-income households, which are households with an annual income between **50-80% of the MSA median income**

The Comprehensive Housing Affordability Strategy (CHAS) Data Book is published using data from the census bureau and the Department of Housing and Urban Development. This tool helps communities get a snapshot of their housing needs for planning purposes.

Extremely Low-Income Households

The "extremely low-income" designation applies to those households whose incomes are at or below 30% of the area median income. There are 37,103 extremely low-income households in the City of St. Louis. Among these households, there are more renters than homeowners.

Table 23

Extremely Low-Income Households

Extremely Low Income Households	37,103
Renters	28,509
Owner-Occupants	8,594

Source: Comprehensive Housing Affordability Strategy Data Book

More than 70% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden. The majority of these households are paying more than 30% of their household income for housing.

Extremely low-income can also be identified by household type. Elderly and small family households each make up about 30% of the group. Large families make up about 10% of the group, and the remainder are other types of households.

Table 24

Extremely Low-Income Household Types

Household Type	Renters	Owners
elderly	18.9%	10.9%
small family	23.1%	5.8%
large family	7.5%	2.0%
other	27.3%	4.5%

Source: Comprehensive Housing Affordability Strategy Data Book (2005-2009)

Low-Income Households

The "low-income" designation applies to those households whose incomes are greater than 30%, but less than or equal to 50% of the area median income. There are 24,288 low-income households in the City of St. Louis. About half of low-income households have some sort of housing problem. Again, cost burden is one of the primary housing problems for this group. Almost 44% of these households are paying more than 30% of their household income for housing, and almost 11% are paying more than 50% of their household income for housing. There is improvement in the cost burden data for low-income households when compared with data for extremely low-income households.

Table 25

Low-Income Households

Low-Income Households	24,288
Renters	15,067
Owner-Occupants	9,221

Source: Comprehensive Housing Affordability Strategy Data Book (2005-2009)

Low-income, cost burdened households can be further identified by household type: elderly, small family, large family, and all others. There is a similar breakdown of household types: about 30% are elderly, about 30% are small families, about 10% are large families. The remainder are other types of households.

Table 26

Low-Income Household Types

Household Type	Renters	Owners
elderly	13.6%	18.3%
small family	20.1%	10.6%
large family	5.3%	4.0%
other	23.0%	5.1%

Source: Comprehensive Housing Affordability Strategy Data Book (2005-2009)

Moderate-Income Households

The "moderate-income" designation applies to those households whose incomes are greater than 50%, but less than or equal to 80% of the area median income. There are 30,686 moderate-income households in the City of St. Louis. A little fewer than a quarter of moderate-income households have some sort of housing problem. Once again, cost burden is a housing problem for this group.

Table 27

Moderate-Income Households

Moderate-Income Households	30,686
Renters	15,870
Owner-Occupants	14,816

Source: Comprehensive Housing Affordability Strategy Data Book (2005-2009)

Approximately 16% of these households are paying more than 30% of their household income for housing.

There are fewer elderly households by percentage in the moderate-income household group, but the small family group is about 30% of the group and large families are about 10% of the group. The number of cost-burdened households continues the expected trend of improvement as the incomes increase.

Table 28

Moderate-Income Household Types

Household Type	Renters	Owners
elderly	6.5%	16.1%
small family	16.5%	15.9%
large family	4.1%	6.2%
other	24.6%	10.1%

Source: Comprehensive Housing Affordability Strategy Data Book (2005-2009)

Lead-based Paint Initiatives

Childhood lead poisoning disproportionately impacts low income households which makes it a fair housing issue. In 2003 the City of St. Louis with Lead Safe St. Louis adopted a plan designed to eradicate childhood lead poisoning. The plan shifted focus from reacting to instances of childhood lead poisoning to a focus on prevention. A coordinated effort among the Building Division, the Department of Health and the Community Development Administration was needed to increase awareness, increase testing, and remediate lead in homes. By 2007 the City cut instances of childhood lead poisoning in half. In 2008 the number of children tested increased, and the instances of childhood lead poison continued to decrease. The City is committed to pursuing grants and other sources of funding to continue efforts to eradicate childhood lead poisoning. With a strong effort by the City and partnering agencies, this once daunting impediment to safe housing has been significantly diminished.

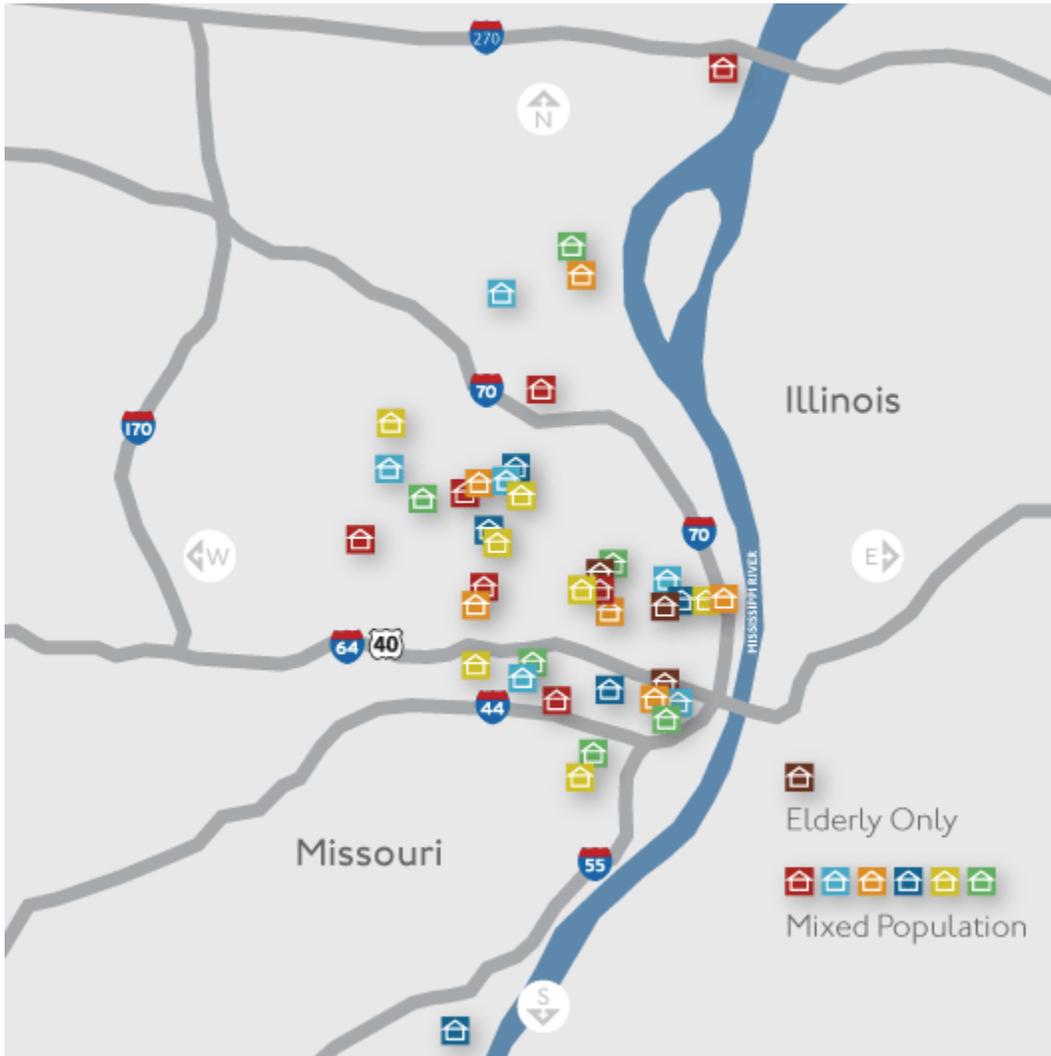
St. Louis Housing Authority

The St. Louis Housing Authority manages federally funded programs such as the Housing Choice Voucher Program (formerly known as Section 8) and public housing. For both programs the amount of rent owed is limited to 30% of a household's income. SLHA reports that they manage 2,941 public housing units and 6,128 vouchers. There are over 5,000 people on the waiting list for public housing and over 5,000 people on the waiting list for a Housing Choice Voucher. The waiting list is closed.

Since the 1990s the federal program HOPE VI (Housing Opportunities for People Everywhere) has combined demolition and the physical rebuilding of severely distressed public housing with services aimed at improving the life's of residents. HOPE VI has been effective at reducing the concentration of poverty and improving some resident outcomes, particularly for those moving to the private market and to mixed-income developments. In the City of St. Louis, Hope VI grants have allowed obsolete and dangerous high rises to be replaced with modern mixed-use housing.

Map 19 was obtained from the SLHA's web site (<http://www.slha.org>). It shows public housing clustered in the lowest income areas of the City. This concentration meets the needs of the lowest income population by focusing assistance on areas of need, but, at the same time it also helps create pockets of poverty that are difficult to overcome.

MAP 21
Public Housing



Source: St. Louis Housing Authority web site

Fair Housing Profile

The City of St. Louis funds the Civil Rights Enforcement Agency (CREA) through general revenue in order to eliminate, reduce and remedy discrimination in housing, employment, education, city services, public accommodations and real property transactions and uses and to provide equal opportunity enforcement. CREA's work includes outreach and education and fielding fair housing complaints.

The Civil Rights Enforcement Agency entered into a worksharing agreement with HUD in 2007 to begin investigating allegations of discrimination. Since that time, CREA has received over 331 complaints related to Fair Housing, as shown in Table 29.

Table 29
CREA Fair Housing Complaints/Cases (2007-2013)

Year	Complaints/Cases
2007	14
2008	12
2009	40
2010	58
2011	64
2012	69
2013	74

Source: Civil Rights Enforcement Agency

Additionally, the City of St. Louis provides funding to the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) to ensure that its citizens have recourse if they have complaints about potential violations of their fair housing rights. Between January 2004 and 2012 the EHOC has received 134 complaints about fair housing violations in the City of St. Louis. Race and disability are the largest classes of complaint. Gender and familial status are the second most common complaints. Since the Lending Crisis of 2008 the EHOC reports an increase in the number of complaints about lenders.

Table 30
EHOC Fair Housing Complaints by Protected Class (2004 – 2012)

	Race	Color	Religion	Sex	National Origin	Familial Status	Disability	Accessibility	Tenant Landlord	Other
Rental	19		2	16		19	33		11	8
Sales	4				8					
Lending	8			2	4					
Insurance										
Advertisement										
Harassment										
Zoning										
Total	31	0	2	18	12	19	33	0	11	8

Source: Metropolitan St. Louis Equal Housing Opportunity Council

The EHOC works to the parties of the complaint to resolve the dispute, and most of the time there is no need for further intervention. However, if necessary, the EHOC uses the resources of HUD, the Department of Justice and the Missouri Commission on Human Rights to resolve complaints. Below is a table that shows how the complaints were addressed.

Table 31
EHOC Complaint Resolution (2004-2012)

Complaints filed with U.S. Department of Housing and Urban Development	44
Complaints filed with Department of Justice	7
Complaints filed with Missouri Commission on Human Rights	17
EHOc assisted complaints	66

Ridge Crest Apartments (located at 3648 Kosciusko Street) provides an example of a familial status case that was referred to HUD for investigation. Five complainants alleged that the respondents' policies, as it related to families with children, were discriminatory. Families with children under 18 years old were given violation notices, and in some cases evicted, because children were playing outside or seen walking in the complex unsupervised. The case was settled when the apartment complex changed its policies.

Table 32
Number of Complaints by Protected Class (1997-2002)

Race	Color	Religion	Gender	National Origin	Familial Status	Disability	Accessibility	Tenant Landlord	Other
31		1	8	4	14	7			

The EHOc reports an increase in complaints filed over the previous seven years. In the previous period, 65 complaints were filed compared to 134 in the most recent period. This increase can be explained in two ways. First, there was increase in complaints about lenders due to an increase in foreclosures. Second, the public is increasingly aware of the EHOc as a fair housing resource.

The most recent fair housing case to affect the City of St. Louis was *United States v. Midwest BankCentre* (E.D. Mo.). In August 2009, the Department of Justice (DOJ) informed Midwest BankCentre ("Midwest") that it was potentially in violation of fair lending laws with respect to residential mortgages in the St. Louis region. The Metropolitan St. Louis Equal Housing Opportunity Council had brought the matter to the DOJ's attention, who decided to pursue it based on evidence that Midwest had lower lending activity in majority black census tracts than did other area banks. Midwest has locations in the following St. Louis suburbs: Arnold, Clayton, Chesterfield, Fenton, Lemay, Oakville, and O'Fallon.

The DOJ charged that Midwest had located their branches in a "virtual horseshoe" pattern around the region's predominantly African-American areas. While Midwest did not ultimately admit to unfair lending practices as charged, it did agree to a settlement with DOJ⁹ that includes the following measures: open a full-service bank branch in a primarily African-American neighborhood; provide \$900,000 in a special financing program to increase the amount of credit the bank extends in such neighborhoods; spend \$300,000 on consumer education and credit repair programs; and spend \$250,000 for outreach to potential customers in underserved areas.

The new Midwest BankCentre Branch will not be located in the city but just adjacent to it in suburban Pagedale¹⁰. Therefore, this branch will likely serve customers from the North Side of the City. While this is just one example of a potential fair housing-related violation, it is a recent one. Further, there is a perception among many that, because overt discrimination has become much more rare or covert, discrimination is not a major problem anymore. The Midwest case shows that effective discrimination can be just as damaging – and it is still occurring.

⁹ <http://www.justice.gov/opa/pr/2011/June/11-crt-784.html>

¹⁰ http://www.stltoday.com/business/local/one-year-after-opening-pagedale-bank-branch-fills-unmet-need/article_2ce0f560-200f-58da-9965-16c74470aed5.html

Review of the Jurisdictions Laws and Regulations

A review of the City's laws and regulations reveals a hospitable environment for fair housing in the jurisdiction. Overall, the survey respondents felt that the Cities' regulations and policies did not create an impediment and were even noted as being a positive force in creating or rehabilitating housing. The City has the following regulations and agencies that were reviewed with regard to fair housing:

- Zoning
- Deed Restrictions and Historic Preservation
- Community Development Agency
- St. Louis Development Corporation (a quasi-governmental agency)
- Housing Conservation Districts
- Affordable Housing Trust Fund
- Civil Rights Enforcement Agency

Zoning

The City of St. Louis has codified the zoning in the St. Louis City Revised Code Title 26. This creates a basis for determining areas for residential, commercial and industrial properties, and it provides clear parameters for changing zoning. Zoning Districts have been established to regulate and restrict the location and use of buildings and use of land for residential, commercial and industrial uses. The districts regulate and limit the intensity of the use of lots and the density of population. Districts also regulate and determine the size of yards. The City is divided into 12 districts:

- A: Single-Family Dwelling District
- B: Two-Family Dwelling District
- C: Multiple-Family Dwelling District
- D: Multiple-Family Dwelling District
- E: Multiple-Family Dwelling District
- F: Neighborhood Commercial District
- G: Local Commercial and Office District
- H: Area Commercial District
- I: Central Business District
- J: Industrial District
- K: Unrestricted District
- L: Jefferson Memorial District

There are also three types of overlay districts:

- Zoning Overlay Districts: Community Unit Plan (CUP)
- Special Use District (SUD)
- Form-Based Zoning District (FBD)

The survey respondents were nearly unanimous in their support for the zoning process. Developers have found the City to have few structural barriers.

Additionally, St. Louis City Revised Code Title 25 covers Building and Construction and adopts (with some changes and amendments) the International Building Code, 2009 Edition, including Appendix Chapters E, F, G, H, I and J. Chapter 11 of the International Building Code, in turn, contains standards for making construction of property accessible. The Building Division, not the Office on the Disabled, enforces compliance with the building codes. Generally, the Office on the Disabled brings ADA and FHAA standards to the attention of the Building Division, developers, and designers. The developers and designers are themselves responsible for complying with those standards.

Section 25.01.280 of the St. Louis City Building Code describes the process by which a property owner or design professional may submit an accessibility waiver request to the Commissioner on the Disabled, and sets forth the criteria used to determine whether or not an accessibility waiver will be granted. (For example, if it is technically infeasible to achieve accessibility, as determined by the Commissioner on the Disabled, a waiver may be granted, or if the functions on the second or other floors above grade are identical to the functions on the first floor, and the first floor is totally accessible, vertical accessibility requirements may be waived.)

Deed Restrictions and Historic Preservation

A deed restriction is a condition placed upon the development or sale of land by the property owner. Common deed restrictions for new developments include minimum home square footage requirements, required amenities such as landscaping, a defined setback from the street, and the types of materials used in construction (brick, stone, etc.). The purpose of a deed restriction is to protect the aesthetic quality of neighborhoods and maintain housing values. Deed restrictions may be placed on a property by a neighborhood association or property owner prior to the sale, subdivision, or development of his or her property.

In some suburban settings, deed restrictions present a very real impediment to fair housing. By placing a minimum lot size or minimum square footage standard on all new residential subdivisions, a jurisdiction may effectively ban smaller, affordable owner-occupied housing, not to mention multi-family rentals. In a relatively dense, built-out urban environment like St. Louis, however, such deed restrictions are very uncommon. While some extant and intact city subdivisions historically built to house the wealthy do indeed carry deed restrictions (e.g., Flora Place in Shaw; various private places in the Central Corridor), these types of housing restrictions are very limited in their distribution around the City.

That said, deed restrictions were formerly used to restrict the race or ethnicity of a homebuyer or tenant. These types of deed restrictions, which were in full force in many St. Louis neighborhoods in the first half of the 20th Century, were ruled unenforceable by the landmark 1948 Supreme Court case *Shelley v. Kraemer* (spawned by a complainant who was a St. Louis resident).

The effects of these bygone race-based deed restrictions remain with St. Louis today despite their status as illegal for several generations. In the 1950s, real estate agents were known to have exploited tensions between whites and African Americans in neighborhoods witnessing a demographic shift. The real estate industry predicted a potential windfall in inciting whites to sell their homes quickly on the assumption that African Americans' moving into their neighborhood would bring property values down. This practice, known as blockbusting, transformed all white enclaves into all black ones within the span of a generation or less in some neighborhoods. For example,

today, the Shelley v. Kraemer house is located in a nearly all black neighborhood (the Greater Ville) with very high rates of poverty. Reducing the effects of racial segregation caused in part by past deed restrictions should be a priority of the City of St. Louis. In addition, the City should work with all appropriate regional entities to ensure that affordable and subsidized housing is distributed across the region as opposed to a heavy concentration in the City. Suburban deed restrictions are alive and well today, presenting a sizeable but ultimately surmountable impediment to fair housing choice.

Today deed restrictions are commonly used to ensure historic preservation and to preserve low-income housing. The City has established a Preservation Plan to ensure that the historic nature of many buildings in the City is preserved. This has largely been used as a way of reinvigorating older neighborhoods. The Historic Review process has clear guidelines and it is easily found and accessed on the City's website. Economic hardship is allowed as an exemption to certain historic district rules and regulations under specific circumstances. Further, developers have been able to combine Historic Tax credits with Low-Income Tax Credits to create even more opportunities for quality housing. None of the survey respondents noted that deed restrictions were hindering fair housing.

Community Development Agency

The Community Development Agency (CDA) administers federal funds for housing, community, and economic development programs that strengthen the City of St. Louis and its neighborhoods. It also works with SLDC and the Planning and Urban Design Agency to carry community and economic development programs according to a 5-year Consolidated Plan. Partnering with local government agencies, non-profit organizations, and private firms to carry out housing development, home repair, business and economic development, public facility improvement, historic preservation, and social service programs is the focus of the agency.

St. Louis Development Corporation

The St. Louis Development Corporation (SLDC) is charged with stimulating "the market for private investment in the City real estate and business development and improve the quality of life for everyone who lives in, works in and visits the City of St. Louis." One of the duties of SLDC is overseeing the Land Reutilization Authority (LRA). The LRA has created a database of properties that the City owns that are available for purchase. Their web site showcasing these properties is user friendly providing clear guidelines for viewing properties and pricing policies. The web site even provides before and after pictures of some of the successful projects that have been fostered.

Housing Conservation District

The City of St. Louis has created the Housing Conservation District. The district requires an occupancy permit and an inspection to ensure that the housing is decent, safe, and sanitary. This was mentioned as an impediment above, because some areas require an inspection and permit and others do not. Overall, this is a step in the direction of improving the existing housing stock to ensure that all citizens have access to quality housing.

Affordable Housing Commission

The Affordable Housing Commission provides grants and loans for developers to build affordable housing and to create accessible housing. All of the funds expended are for the benefit of low and moderate income residents. The AHC has also been a force for encouraging housing for disabled residents by requiring the adoption of Universal Design in all of the projects that are awarded funds.

Civil Rights Enforcement Agency

The mission of the Civil Rights Enforcement Agency is to monitor and investigate fair housing, equal employment and public accommodation complaints. Ordinance 67119 (as amended) of the Civil Rights Enforcement Agency (CREA) intends to eliminate, reduce and remedy discrimination in housing, employment, education, city services, public accommodations and real property transactions and uses and to provide equal opportunity enforcement.

CREA is designated as a Fair Housing Assistance Program (FHAP), and has a worksharing agreement with the U.S. Department of Housing and Urban Development (HUD) to investigate charges of housing discrimination. CREA has fielded 305 fair housing complaints since 2009.

Besides enforcement activities, CREA also provides information and referral services, dispute resolution, and education/outreach programs for the general community and professionals. CREA has steadily increased the amount of public speaking appearances and public outreach to the community. In September 2014, CREA hosted their first Fair Housing Conference, titled "Creating Collaborative Opportunities: Meeting the Fair Housing Challenge." The conference had an attendance of 199 persons and was the largest of its kind in the St. Louis region. Materials from the conference and more information about CREA's history and outreach programs can be found online <http://stlcrea.org/about/>.

Identification of Impediments

Impediments to fair housing choice were identified in several ways. The survey instrument (located in Appendix B, with survey results located in Appendix C) identified the concerns of community leaders and housing advocates. Another source was the Civil Rights Enforcement Agency (CREA), the city's agency tasked with eliminating, reducing and remedying discrimination in housing, employment, education, city services, public accommodations, real property transactions and uses. Data, research, and analysis presented in the prior sections of this document – including the Demographic Profile, Housing Profile, and Fair Housing Profile – also produced insights into potential impediments. Finally, an Action Strategy Workgroup Meeting was held November 6, 2014 to supplement already-identified impediments and collectively strategize around potential actions to alleviate impediments. Summary notes from that meeting can be found in **Appendix E**.

Public Impediments

1: Lack of Rental Assistance

Impediment:

There are not enough rent-assisted units to meet the demand.

Impact:

Many low-income residents have less access to quality housing.

Analysis:

The study, Characteristics of HUD-Assisted Renters and Their Units in 2003, looked at the number of renter households eligible for assisted housing, and found that most were not provided with any federal assistance. In the United States, there were 16,577,000 households eligible for assisted housing, but only 4,280,000 were served. Of the 12,297,000 unassisted households, about 41% were considered to have worst case needs.

The situation in St. Louis is reflected in those national numbers. The CHAS Data Book identifies 78,148 renter households in the City, 37% of which are cost burdened and 20% of which are severely cost burdened. When looking at extremely low-income, low-income, and moderate income households, the situation is more dire. Approximately 73% of extremely low-income households, 49% of low-income households, and 22% of moderate-income households have one or more housing problems. The primary housing problem in each group is cost burden.

The St. Louis Housing Authority manages federally funded programs such as the Housing Choice Voucher Program (formerly known as Section 8) and public housing. Under both programs the amount of rent paid by the tenant household is limited to 30% of the household's income. SLHA reports that they assist about 9,000 households, with over 5,000 on the waiting list for public housing and for vouchers. Even with this level of assistance, there are still approximately 20,000 households in need of such assistance that do not receive it.

The large percentage of households with very low income levels in the City of St. Louis further demonstrates the amount of need. Thirty-eight percent of households in the City earn less than \$25,000 annually. Assuming housing affordability at 30% of income, a household that earns \$25,000 per year could afford to spend \$625 on housing each month. The median contract rental rate (not including utilities) in the City is \$636. So, the household pays \$11 more than 30% of their income toward rent every month.

Table 33

Impact of Rent on Income with an annual income of \$25,000

Percent of Households	Income Level	30% of Income Monthly Income at \$25,000	Average Rent	Deficit
38.0%	Less than \$25,000	\$625	\$636	\$11

This deficit is exponentially worse when looking at a household making just \$15,000 annually. 22% of households in the City earn less than \$15,000 annually. Again, assuming housing affordability at 30% of income, household that earns \$15,000 per year could afford to spend \$375 on housing each month, with the average rental rate in the City being \$636. So, the household would pay \$261 more than 30% of its income toward rent every month. In this scenario, the household would pay more than 50% on its income toward rent.

Table 34
Impact of Rent on Income with an annual income of \$15,000

Percent of Households	Income Level	30% of Income Monthly Income at \$15,000	Average Rent	Deficit
23.4%	Less than \$15,000	\$375	\$636	\$261

This example demonstrates the effect of income on housing. When a household pays a greater portion of its income toward rent, there is less for other essentials such as food, clothing, utilities, transportation, and health-related costs. This forces the household to make difficult decisions about which essentials to do without, and it makes the household more dependent on the City to provide services in this gap.

Unfortunately, protected classes are particularly affected by a lack of affordable rental units or vouchers. For example, according to 2006-2010 Comprehensive Housing Affordability Strategy (CHAS) data, in the City of St. Louis, two racial groups experience housing cost burden (either housing cost burden between 30% and 50% or severe housing cost burden over 50%) at a disproportionately greater rate: Blacks/African Americans and American Indians/Alaska Natives. In addition, Pacific Islanders experience severe housing cost burden (> 50%) at a disproportionately greater rate. Blacks/African Americans experience severe housing cost burden (>50%) at a rate 9% points higher than the jurisdiction as a whole, which, while not technically meeting the definition of disproportionately greater need, is still a notable disparity.

Additionally, there are significant disparities in income between racial groups in the City of St. Louis. This is obviously closely related to the housing cost burden data described in the paragraph above, since higher income households can afford a higher percentage of the available rental and for-sale housing units within the City. According to 2013 American Community Survey data, households with a white head of household in the City of St. Louis have a median household income of \$48,458, while households with a Black/African American head of household have a median income of \$23,357 – less than half that of white households. Income disparities demonstrate that some protected classes are particularly impacted by a lack of affordable housing and Housing Choice Vouchers and a lack of investment in these programs leaves Black/African American households disproportionately vulnerable.

2: Tax Credit Uncertainty

Impediment:

Continuing uncertainty regarding the General Assembly's commitment to funding tax credit programs used to fund low-income housing construction and rehabilitation is leading to uncertainty in the public and private sectors about the future availability of these resources in the production of affordable housing.

Impact:

Developers are unable to take on the financial risk of doing the initial planning work needed to reach the application stage for tax credits when the state tax credits are under threat of being reduced by an amount yet to be determined and layering regulations have not yet been agreed upon.

Fewer affordable and mixed-income developments will be produced with the reduction of state credits.

Analysis:

Many low-income developments are funded through Federal and State Low-Income Housing Tax Credits which are overseen by the Missouri Housing Development Commission (MHDC). Last year, Governor Jay Nixon assembled a panel to study the impact these tax credits have on the budget and to issue recommendations. The panel strongly recommended reducing funding due to the drain on the budget. As recommended by the panel, MHDC did reduce the amount of state tax credit authority awarded in February 2011. There were \$12,500,000 of federal tax credits available, and the state is able to match that amount; however only \$7,500,000 of state tax credits were awarded.

The issue is not resolved yet, and the Missouri legislature continues to debate the funding for State LIHTC credits. It is the general consensus that there will continue to be threats to the state LIHTC and historic tax credits, but the actual amounts that might be cut from these programs are yet to be determined. The state tax credits have

become an important tool for developers of affordable and market-rate housing state-wide, but they have had the greatest impact on the urban areas of the state. Any reduction or restriction on layering these credits will result in the production of fewer affordable units in the St. Louis area.

3: NIMBYism

Impediment:

Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

Impact:

Resident resistance may influence policy makers who might otherwise support housing development for protected classes.

Resident objections in many cases slow or eliminate the development of group homes.

If residents opposed to housing for protected classes in our near their neighborhoods succeed, developers may not be able to provide appropriate housing choices in areas of opportunity.

Successful NIMBY opposition may help perpetuate discriminatory attitudes toward protected classes.

Analysis:

NIMBY is an acronym standing for Not In My Back Yard. NIMBYism, as it is known, is the opposition of residents to developments in their neighborhood that putatively cause crime, lower property values, or generally have a negative effect. The name derives from the fact that many NIMBYs do not necessarily object to the proposed development; they object to its location near their home (i.e., "not in their backyard"). NIMBYism is often used in the context of dangerous or unwanted land uses, such as environmental hazards, in addition to social concerns, such as low income or transitional housing. It is commonly referred to as a problem in public policy and development circles due to the fact that NIMBYs are often opposed to such land uses on principle without considering any facts or additional information about the development in question.

The survey respondents were decidedly mixed in their concern about NIMBYism. One respondent noted, "NIMBYism is fairly rampant, where housing includes people with disability, and this impedes the ability of disabled persons to assimilate themselves within our society." However, another respondent found NIMBYism less debilitating, "The impact of zoning requirements and NIMBYism on equal access to housing in the City is minimal and limited to pockets within the City. There is some opposition to housing for special needs populations but this is usually easily overcome."

The disparity in responses is no doubt a result of the individual's experience with their neighborhood and by the type of housing that they might be proposing. A developer who proposes affordable housing for seniors might encounter less protest than an organization proposing transitional housing for recovering addicts. The perceived problems with each population will shape the neighborhood discussion.

Another survey respondent noted the need for geographic dispersal of housing, "Subsidized housing is not evenly distributed throughout the City of St. Louis. The location of subsidized housing should be scrutinized and measures put in place to encourage development of subsidized housing in neighborhoods that may not have any. All neighborhoods should be open to the development and location of subsidized housing".

This notion that a greater need for a geographic dispersal of affordable housing is a regional issue as well as a local issue. The City enjoys a reputation that there will be less resident resistance to the development of affordable housing than in St. Louis County. A recent search of "residents oppose" in the stltoday.com archives resulted in 107 articles dating back 12 years (from 2000-2012.) The number of articles supports the perception that NIMBYism is more prevalent in St. Louis County.

Table 35
Articles in STLtoday.com Archives Relating to Resident Opposition

Location	St. Louis City	St. Louis County	St. Charles County	Other
Number of Articles	8	59	11	11

While residents' concerns about their neighborhoods should be addressed, they should not be the only deciding factor in site selection. This negative view of affordable housing initiatives can add to the difficulty of tenants finding affordable housing. They may be viewed as undesirable tenants and neighbors just by being a member of a protected class.

4: Limited Access to Resources

Impediment:

The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

Impact:

Steady employment is difficult to find and maintain for protected class members with few resources.

It is difficult for families in protected classes to find affordable housing and obtain quality education for their children.

Analysis:

Most low-income housing is developed by private developers with LIHTC financing and with partial financing through the Affordable Housing Commission or the Community Development Administration. Since private developers initiate the process, site selection is more about ease of obtaining the land and avoiding problems with the neighborhood.

Another factor that should be considered is that affordable housing investments are often used as a means to rebuild failed markets in distressed communities. Affordable housing developments provide jobs and stability in neighborhoods that would have little investment if not for public investment and can lead to further private investment.

However, an overabundance of low-income targeted developments in impoverished neighborhoods in certain portions of the City (and especially heavily impacted neighborhoods of North St. Louis) has led to the perpetuation of areas that are defined by poverty.

Such a large problem calls for creative solutions that require both public and private investment.

The City of St. Louis has entered into a redevelopment agreement with Northside Regeneration, LLC in order to address a blighted area of the Near Northside of the City. The redevelopment area has seen significant population loss and severe economic contraction over the last 50 years. In fact, the majority of the area was first declared blighted in 1947 and subsequent small scale redevelopment efforts have done little to reverse the trend. The City and Northside Regeneration are planning a large scale development based around the creation of significant tracts of land of suitable size to attract large-scale employers that have been unable to find the amount of consolidated land needed for the construction of their desired facilities. Many large employers have chosen to locate in surrounding counties where finding large tracts of land is less difficult or land assemblage is less complex. While job creation and retail are the focus of early phases of the project, an estimated 6,000-9,000 housing units are planned for over the next 20 years. The City has placed strict guidelines on the creation of affordable housing in an effort to ensure a suitable housing mix for persons of all incomes. In addition, the City is requiring that 25% of new housing units are constructed utilizing universal design standards.

5: Lack of Fair Housing Knowledge

Impediment:

Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

Impact:

Fair Housing complaints may be under-reported.

Analysis:

Over the past three years, CREA has increased their outreach to the LGBTQ and immigrant and refugee communities through partnership grants from the U.S. Department of Housing and Urban Development. CREA has also increased the amount of public speaking appearances, formed cooperative agreements with immigrant/refugee servicing social service agencies, aired radio ads, produced written materials in a variety of languages, and hosted their first Fair Housing Conference, with an attendance of 199 persons (the largest of its kind in the St. Louis region).

Additionally, over the last few years, the EHOc has done extensive public outreach to improve information about redress available to persons suffering from Fair Housing abuses. The number of complaints reported to the EHOc more than doubled in the last seven years.

Despite admirable outreach and education work being done by both EHOc and CREA, in a survey of the housing community from 2012, a few respondents noted that they were unaware of efforts to enforce fair housing in the City of St. Louis. While this was a minority of respondents, it does speak to the fact that outreach is still important and necessary.

6: Occupancy Permit Discrepancies

Impediment:

Occupancy permit requirements are unevenly applied across the City of St. Louis.

Impact:

Tenants are renting properties that lack occupancy permits.

Landlords face additional barriers when renting to Housing Choice Voucher holders, which decreases the availability of housing for these residents.

Analysis:

Occupancy permits are one way that a municipality can protect its residents, as they help control the quality and safety of housing. Another benefit to occupancy permits is that tenants gain some leverage to have residences brought up to code and made safer before occupying these dwellings. Survey respondents noted occupancy permits as having a positive impact on fair housing.

Currently, apartments rented to Housing Choice Voucher holders are subject to an additional occupancy permit before they can be rented to the Voucher holder. This has a practical consequence of making it more difficult for landlords to rent to Housing Choice Voucher tenants, which puts these tenants at a disadvantage when trying to secure housing. As landlords seek quick turnarounds and lower costs, such added barriers cause them to either

consciously or unconsciously preference non-Voucher tenants. This decreases the availability of housing choices for Housing Choice Voucher holders.

Private Impediments

7: Biased Real Estate Information

Impediment:

Real Estate agents do not provide enough information about the amenities of the City of St. Louis to customers who want information about where to locate.

Impact:

Agents are effectively steering customers away from purchasing in the City of St. Louis by providing only limited information about schools.

Analysis:

The EHOOC has conducted some blind tests with various agents. Members posed as buyers interested in purchasing real estate but without knowledge of the area. Schools are one of the major factors that people cite as being their deciding factor in choosing where to buy a house. When asked, agents provided the customer with data that reflected only that the school district had been taken over by the state and was distressed.

The Missouri Real Estate Commission (MREC) and the St. Louis Association of Realtors (SLAR) work with agents to receive regular education about fair housing. A review of disciplinary actions taken by the MREC shows no actions taken due steering. This alone could present an inaccurate picture. The MREC would only address complaints as they were presented, home buyers would be unlikely to present a charge of steering to the MREC when presented with factual information about the school district. Further the MREC would be unlikely to find an agent at fault for provide accurate, if incomplete, information.

The failure of real estate agents to educate homebuyers on the range of school options available to City residents and their children may effectively encourage home seekers to exclude the City of St. Louis from consideration.

8: Restricted Access to Credit

Impediment:

There has been a constriction in access to credit for low-income and minority borrowers.

Impact:

Without access to credit, low-income residents and minorities do not have free and equal access to credit.

Analysis:

In 2008, lending institutions came to a crisis point. Too many loans had been made to under-qualified borrowers on the assumption that housing prices would continue to rise and that the price of the house would cover any loss that the lender incurred due to foreclosure. That assumption fell apart as foreclosures forced lenders to the brink of collapse. Many required a bailout from the federal government to weather the storm.

The bailout of the lenders left citizens cynical that the bailout did not trickle down to borrowers with increasing numbers of foreclosures happening since 2008. The Metropolitan St. Louis Equal Housing Opportunity Council

(EHO) confirmed those suspicions when they published *Redlined: A Fair Lending Analysis of the St. Louis Metropolitan Area*.

The report examined the performance of the ten largest mortgage lenders in the St. Louis area, including, U.S. Bank, Wells Fargo, Pulaski Bank, Bank of America, USA Mortgage, Heartland Bank, MetLife Bank, Regions Bank, Countrywide Mortgage and JP Morgan Chase Bank. The report finds lending to low-income neighborhoods decreased by over 60 percent. In contrast, the volume of lending to upper-income neighborhoods has increased by 46 percent. Lending to minority communities has decreased by 68 percent, compared to a 24 percent increase in lending to overwhelmingly white areas.

In addition, many borrowers in predominately minority communities have less access to bank services. All of the zip codes in St. Louis City that do not have any full-service bank branches are areas that have a predominately African-American population. In contrast, there are six zip codes with a predominately white population that have at least one bank for every 1,500 persons.

The report also found that African-American borrowers have also experienced a significant decrease in lending. Since 2007, lending to African-Americans decreased by almost 50%. In contrast, the volume of lending to white borrowers increased by 22 percent. Loan originations to African-American borrowers represented only 4.73 percent of all loan originations in 2009.

These findings represent a large scale issue of free and equal access to lending among protected classes.

Fortunately, the City of St. Louis has been seeking to address this issue by working to attract banking services to underserved areas, utilizing subsidies if necessary.

Public/Private Impediments

9: Lack of Accessible Housing for People with Disabilities

Impediment:

Accessible housing units are not often available to people with disabilities.

Impact:

Persons with disabilities needing accessible housing do not have free and equal access to housing.

Developers/property managers with accessible housing units available are unable to connect with persons with disabilities in an efficient manner, resulting in accessible units being occupied by households who do not need the additional accessible features.

Existing housing information sites, such as Social Serve, are not capturing all existing accessible units.

Existing accessible units may be in locations where retail services, transportation services, and public amenities are unaccessible, or where sidewalk and curb cut improvements are needed in order for persons with disabilities to have full access to services and amenities.

Analysis:

The study, *2009 Worst Case Housing Needs of People with Disabilities*, found that renter households with disabilities are more likely to have housing problems than renter households without disabilities. This discrepancy was because, "People with disabilities face additional burdens to finding safe and affordable housing for several reasons, such as being subjected to housing discrimination and encountering limited availability of accessible housing units."

The most recent census data indicates that there is a great need for accessible housing in the City of St. Louis. An estimated 14% of the population has a disability, and 7.2 % has an ambulatory disability. When looking at just the senior population of the City, approximately 44% have a disability, and 30% have an ambulatory disability. This is a large population of residents that have a disability when compared to St. Louis County where 9% of the population consists of residents with disabilities.

In the survey of housing advocates, agencies serving people with disabilities indicated that there is a lack of rental units for their clients. In order to confirm this anecdotal evidence, a survey of Social Serve, a web site that lists available affordable housing for renters, was conducted in 2012. The web site allows custom searches with many options for accessibility in housing, so we searched for housing in the St. Louis area (which includes St. Louis City and St. Louis County) that has no step or ramped entry and has doors at least 32" wide. This represents the minimum requirements for persons in wheelchairs to access a unit.

The results confirmed the anecdotal evidence that it is difficult for people with disabilities to find rental housing. The search found 63 units that met the requirements, but only 16 were in the City of St. Louis. To compare, a search of the St. Louis area without the accessible search factors included found 1,052 available units with about 1/3 of them being located in the City. The survey of accessible units found units dispersed throughout the City, but very few with a wide array of features that some might require.

Table 36
Rental Units with Accessible Features

	# of Bedrooms	No step, flat entry	Ramped entry	Door width 32" - 36"	Door width: more than 36"	Door knocker/bell signaler	Lever-style door handles	Single level unit	Accessible peephole	Automatic door entry	Non-digital kitchen appliances	Front controls on stove	Counter Height	Grab bars	Lowered toilet	Raised toilet	Bathroom counter: minimum 27" clearance	T-turn bathroom	Roll in shower	Accessible elevators	Unit on first floor	Within paratransit	Parking near building	Sign language friendly
63101	1	x			x		x			x		x		x	x					x	x			
63103	2	x		x				x																
63106	1	x		x		x		x													x		x	
63106	2	x		x		x															x		x	
63107	3	x		x		x		x													x			
63107	2		x	x		x			x							x					x			
63112		x		x		x		x			x													
63112	4	x			x			x																
63112	2	x			x			x			x	x						x						
63112	1	x		x				x			x	x									x			
63113	2	x		x		x		x				x									x			
63115	2	x		x				x				x									x			
63116	1		x		x			x					x			x	x				x		x	
63118	3	x			x		x	x																
63118	1	x			x	x		x	x	x	x	x		x	x		x			x	x	x		
63118	2	x		x			x	x						x				x	x	x	x		x	x

A limited number of units of accessible housing and pressure to maintain low vacancy numbers can mean accessible housing is occupied by persons not needing the additional assistances built into the unit. A survey respondent told of their experiences with lack of accessible housing, "So many people with disabilities are put on long waiting lists for accessible housing that exists, while people who do not need accessible housing are put into those units, just because their name has come up on the waiting list for any housing."

One survey respondent offered the following insight:

If we use Universal Design as the housing standard for new construction and gut rehabs in the city we also create more housing choice for people. Anyone can buy or rent Universal Housing and therefore, people with disability or families who have a disabled member or friend can choose a universal home wherever it exists and not have to wait for an accessible home to be built (which won't happen, unless they build it themselves). In addition, if a non-disabled homeowner, or family member, becomes disabled the home quickly and inexpensively converts to allow for accessibility and can also be converted back for the next owner or renter—with minimal effort or expense.

10: Limited Access to Transit

Impediment:

Limited public transportation funding endangers access to public transportation for members of protected classes. Furthermore, job growth in transit inaccessible areas of the region is threatening the stock of available employment for low income individuals.

Impact:

Many people in protected classes were limited in where they could live or work.

Analysis:

Metro transit offers many lines throughout the City of St. Louis. It allows residents to move throughout the City with relative ease. A resident attempting to visit a friend or reach a job in St. Louis County has more limited options for travel. As seen on the Metro map¹¹, options for travel within St. Louis County are more limited. This can affect residents' ability to obtain and maintain employment in areas not well serviced by Metro.

The 2008 service cut by Metro demonstrated the impacts of reduced mobility on the regional economy. Far western St. Louis County suburb Chesterfield's then-Mayor John Nations noted that many employees of the various retail stores in the expansive Chesterfield Commons development could no longer reach their jobs when Metro announced that almost all service west of Interstate 270 would be cut due to a budget shortfall. All across St. Louis plastic bags were placed over former bus stops announcing that "Due to lack of funding, service to this stop has been suspended".

Nations was so convinced of the importance of transportation to employment availability in his city that he would later become an integral part of a campaign to reintroduce a sales tax ballot measure in St. Louis County designed to support service restoration for Metro (Nations is now Metro's CEO). The campaign, dubbed Proposition A, was ultimately successful and nearly all service was restored by the end of 2010. While the expanding retail and other service sector jobs of West County are therefore still served by public transportation, although not at an optimal level, a growing number of jobs in St. Charles County just to the west lack any transit service.

¹¹ http://www.metrostlouis.org/Libraries/System_Map_PDFs/MO_System_Map.pdf

Summary of Recommended Actions and Implementation Plan

The table on the following pages summarizes recommended action steps to alleviate impediments, the relative priority of these action steps, proposed timelines, and proposed measures of success. This table is meant to be a reference guide/working guide to the full AI, allowing both City staff and the general public to quickly understand what concrete steps the City of St. Louis is taking to affirmatively further fair housing under this AI. Detailed descriptions of each action step are included in the following section.

Summary of Recommended Actions and Implementation Plan

Recommended Action	Related Impediments	Priority (A = High)	Timeline	Responsible Entity	Measure for Success
1. Lobby at the state and federal levels to preserve funding for assisted housing and for tax credit programs used to construct and rehabilitate low-income housing	1. Lack of Rent Assistance 2. Tax Credit Uncertainty	B	Start: January 2015 Complete: December 2015 Ongoing thereafter	<ul style="list-style-type: none"> • Mayor's Office • MOWHA 	<ul style="list-style-type: none"> • Legislative outcomes
2. Encourage developers to engage residents and address potential NIMBYism early in the planning process of a development	3. NIMBYism 4. Limited Access to Resources	B	Start: April 2014 Complete: Ongoing	<ul style="list-style-type: none"> • CDA • AHC 	<ul style="list-style-type: none"> • Fewer projects stalled due to resident opposition
3. Increase transparency and resident engagement in city planning efforts to address potential NIMBYism issues	3. NIMBYism 4. Limited Access to Resources	B	Start: January 2015 Complete: Ongoing	<ul style="list-style-type: none"> • Planning and Urban Design Agency 	<ul style="list-style-type: none"> • Increase in information available online • Increase in responses to Citizen Participation Plan

Summary of Recommended Actions and Implementation Plan

Recommended Action	Related Impediments	Priority (A = High)	Timeline	Responsible Entity	Measure for Success
4. Set clear and transparent fair housing related priorities for making recommendations to MHDC about LIHTC applications within the City, and make those priorities available to the public.	3. NIMBYism 4. Limited Access to Resources 10. Limited Access to Transit	A	Start: January 2015 Complete: June 2015	<ul style="list-style-type: none"> Mayor's Office 	<ul style="list-style-type: none"> Priorities available on City's website for public review
5. Realign the City's CDBG and AHC application timelines to correspond with the state's LIHTC application timeline	2. Tax Credit Uncertainty 4. Limited Access to Resources	A	Start: June 2014 Complete: December 2016	<ul style="list-style-type: none"> CDA AHC Housing Funders Group 	<ul style="list-style-type: none"> Aligned funding application timelines
6. Ensure that Fair Housing information, as well as information about tenants' rights, is made available throughout the City of St. Louis.	5. Lack of Fair Housing Knowledge	A	Start: January 2015 Complete: Ongoing	<ul style="list-style-type: none"> CREA EHOC International Institute Additional neighborhood partners 	<ul style="list-style-type: none"> Distribution of tenants' rights materials Increased attendance at CREA conference
7. Eliminate discrepancies in the housing inspection requirements for tenants using standard payment methods versus tenants using Housing Choice Vouchers	6. Occupancy Permit Discrepancies	A	Start: January 2015 Complete: December 2015	<ul style="list-style-type: none"> Board of Aldermen 	<ul style="list-style-type: none"> Revision to the appropriate ordinance

Summary of Recommended Actions and Implementation Plan

Recommended Action	Related Impediments	Priority (A = High)	Timeline	Responsible Entity	Measure for Success
8. Hold lending institutions accountable to community obligations and CRA regulations	8. Restricted Access to Credit	B	Start: 2014 Ongoing	<ul style="list-style-type: none"> EHOC CREA 	<ul style="list-style-type: none"> Increased banking presence in underserved areas
9. Clarify the city's regulations regarding source-of-income discrimination by landlords	3. NIMBYism 4. Limited Access to Resources	A	Start: January 2015 Complete: December 2015	<ul style="list-style-type: none"> Mayor's Office Board of Aldermen 	<ul style="list-style-type: none"> Official statement pertaining to the issue
10. Encourage real estate agents to market the assets and opportunities available in St. Louis City	7. Biased Real Estate Information	C	Start: January 2016 Complete: December 2016 Ongoing thereafter	<ul style="list-style-type: none"> Mayor's Office 	<ul style="list-style-type: none"> Trainings and resources added to MREC and SLAR programming Updated "Live and Work" section of St. Louis City website
11. Make housing more accessible to residents with disabilities	9. Lack of Accessible Housing for People with Disabilities	B	Ongoing	<ul style="list-style-type: none"> AHC CDA 	<ul style="list-style-type: none"> Updated goals for residence accessibility Increased listings of accessible units on Social Serve website

Summary of Recommended Actions and Implementation Plan

Recommended Action	Related Impediments	Priority (A = High)	Timeline	Responsible Entity	Measure for Success
12. Continue partnerships and planning to improve the regional public transit outlook	10. Limited Access to Transit	B	Ongoing	<ul style="list-style-type: none"> • Metro • East-West Gateway 	<ul style="list-style-type: none"> • Development of plans to increase transit access

Action Steps to Alleviate Impediments to Fair Housing

Action 1: Lobby at the state and federal levels to preserve funding for assisted housing and for tax credit programs used to construct and rehabilitate low-income housing.

The city's lobbying power resides in the Mayor's Office. In addition, the Missouri Workforce Housing Association (MOWHA) is a statewide organization that supports lobbying on affordable housing issues in the State Capitol. These entities should use their power to make targeted appeals to the MHDC, to the state legislature and governor, and to the federal legislature around the issues of funding for assisted housing and for tax credit programs used to construct and rehabilitate low- and mixed-income housing in St. Louis. Regarding assisted housing funding, lobbying efforts should seek to expand access to Housing Choice Vouchers in St. Louis. Regarding tax credit program funding, lobbying efforts should seek to maintain or expand upon current allocation levels for both the federal and state Low-Income Housing Tax Credit Programs as well as protecting the state Historic Rehabilitation Tax Credit Program. In addition, the responsible parties should consider lobbying for changes in the current cost-per-unit limits used by MHDC in awarding LIHTCs to account for the higher labor costs associated with urban areas. Success will be measured by the submission of yearly reports detailing these lobbying activities (submitted to the CDA) and by monitoring of legislative and administrative changes.

Action 2: Encourage developers to engage residents and address potential NIMBYism early in the planning process of a development.

The CDA, AHC, and other funding institutions can encourage developers to be transparent with project plans and goals and to engage residents early on in the planning process. This encouragement can and should include additional scoring points in the CDA Housing Funding NOFA for applications that thoroughly engage the public early in the planning process. Doing so will allow residents' questions and concerns to be addressed more quickly and appropriately, thus increasing resident support and investor confidence. Additionally, as areas that experience NIMBYism typically have greater access to resources, breaking down such barriers will help to increase access to resources for those who benefit from affordable housing.

In order to foster trust in the engagement process, public engagement efforts – both by developers and by City agencies and departments – should make clear which elements of development proposals are open to input and which are not. The degree to which public input can be incorporated into a proposed development may

differ from project to project. For example, in some cases site constraints, financial constraints, or local, state, or federal regulations may dictate certain elements of a proposal.

Success will be measured by tracking how and when in the development process developers of NOFA-funded applications are engaging the public as well as the instances of development projects stalled due to resident opposition, based on changes to timelines of funded development projects.

Action 3: Increase transparency and resident engagement in city planning efforts to address potential NIMBYism issues.

The St. Louis Planning and Urban Design Agency should be required to share more information about its plans and developments with the public. This can easily be done via the agency's website, and can include information about successful affordable housing developments and the benefits that they can bring to communities. Developing materials explaining the benefits that affordable housing can provide to communities is critical, and would ideally form the backbone of a City supported public education program and outreach campaign to combat NIMBYism.

The City should also work to increase resident representation on the local leadership level. This can include resident leadership in St. Louis Community Development Corporations (CDCs), neighborhood associations, and advocacy groups. Though complex, this process can be started by improving the sharing of information between the city and its residents including through the use of a robust Citizen Participation Plan.

CDCs and neighborhood organizations can assist the City in encouraging proactive, public input and planning on where residents would like to see affordable housing located within their neighborhoods, ensuring that affordable housing is planned for in a long-term, public way. Developers can then be encouraged to propose projects that align with these local neighborhood plans, knowing that their proposals will most likely be supported by residents. CDCs can also be involved in asset-oriented community development and in connecting residents to services and housing opportunities within local communities.

The City's Neighborhood Stabilization Team is another potential partner in combating NIMBYism. Neighborhood Improvement Specialists serve as "on the ground" resources for residents and also have a role to play in the abatement of nuisance properties. Although nuisance properties and affordable housing are not at all synonymous – in fact, the vast majority of affordable developments are professionally managed and well maintained – residents who are opposed to affordable or special needs housing in their neighborhoods will sometimes cite potential nuisance issues as part of their argument, and Neighborhood Improvement Specialists can provide facts and support to alleviate these fears.

Success will be measured by tracking increases in information made available online and by tracking increases in resident involvement in Citizen Participation measures throughout the City.

Action 4: The City should set clear and transparent priorities for making recommendations to MHDC about LIHTC applications within the city, and should make those priorities available to the public.

This action relates to the evaluation and ranking of proposed low-income housing tax credit (LIHTC) projects within the City of St. Louis. The LIHTC program, however, is a state program administered by the Missouri Housing Development Commission (MHDC), and the administration of the LIHTC program, as well as decisions on which projects will be awarded tax credits, rests solely with MHDC and is not under the jurisdiction of St. Louis. The reason this action is included as part of the Analysis of Impediments is that the City of St. Louis is afforded the opportunity to send MHDC a support letter prioritizing LIHTC applications within the City, and the process of prioritization is an opportunity for the City to vocalize support for projects that best affirmatively further fair housing.

The existing process for LIHTC project review involves developers presenting their projects to City of St. Louis staff, who rank the projects in order of preference. The Mayor then reviews staff recommendations and sends a support letter to MHDC. Again, the ultimate decision making power regarding which projects are funded rests with MHDC and not the Mayor's office.

Building upon the existing process of project review for the Mayor's support letter, the City should set clear and transparent priorities upon which to base support and share these priorities with developers well in advance of LIHTC application deadlines in order to encourage developers to meet the priorities when it is feasible for them to do so. These priorities should make clear that the Mayor's support for development projects is contingent upon those projects demonstrating high levels of community engagement, connection to and/or development of areas of opportunity, and access to transit. In addition, developments that increase the economic diversity of an area and/or create mixed-income housing should be prioritized. Other possible priorities include 3-bedroom, 4-bedroom, or 5-bedroom units, accessible units, or projects that include home ownership options for interested tenants after the tax credit compliance period. Finally, the City should prioritize the preservation of existing affordable housing in areas of opportunity as well as in racially integrated neighborhoods, as this strategy will help maintain affordability while expending relatively few resources and avoiding most issues of NIMBYism.

The potential priorities included in the paragraph above will need additional clarification under this action step before being finalized and shared with developers and the general public. As part of the process of clarifying priorities for projects that affirmatively further fair housing, terms will need to be carefully defined. For example, "access to transit" could be interpreted in many ways, and it is recommended that the City institute some type of graduated ranking or prioritization based on number of routes, headway, or types of transit within walking distance of a project location.

Once clarified, these priorities should be made available to developers and residents in advance of the next LIHTC application cycle. Success will be measured by the availability of these priorities for public review. In addition, these priorities can be more specifically identified in CDA Housing NOFA funding applications and scoring rubrics.

Action 5: Align the City's CDBG and AHC application timelines to correspond with the state's LIHTC application timeline.

The City should align the CDBG and AHC application timelines and private foundations should align their application timelines to correspond with the state's LIHTC application deadline as this could benefit both the City's community development priorities and developers looking to invest within the City. It would make these programs more effective by facilitating creative partnerships in more complex development projects and ensuring that resources are aligned and used efficiently. It would also give the City more influence in the types and locations of development projects that are planned; instead of *reacting* to the state's LIHTC application process results the city could be a *proactive* voice in the early planning stages for projects that span multiple funding sources.

The CDA and AHC control their application cycles. These agencies should partner with the Housing Funders Group, a public-private working group seeking to increase collaboration and reduce barriers for those seeking funding to develop housing and supportive services in the City of St. Louis, which has knowledge and experience around this topic, to ensure effective alignment among themselves, private foundations operating in St. Louis, and the MHDC. The planning process for this change began in 2014, with the CDA Fall 2014 NOFA designed to better complement the MHDC funding cycle. However, from the private developer perspective, the CDA NOFA cycle does not allow a developer to apply to MHDC with a CDA funding commitment, meaning that, for the purposes of the MHDC application cycle, none of the potential CDA NOFA funding "counts" as leverage for MHDC.

Action 6: Ensure that Fair Housing information, as well as information about tenants' rights, is made available throughout the City of St. Louis.

This Action is meant to combat a lack of Fair Housing knowledge within the City of St. Louis through an increase in fair housing information and education as well as Landlord Tenant Law/tenants' rights information and education. Both Action 6-A and Action 6-B will require a continued commitment to community outreach and will rely in part on communicating through community partners and trusted neighborhood organizations. Existing community partners, assets, and networks to consider conducting outreach through include the Civil Rights Enforcement Agency (CREA), the Equal Housing Opportunity Council (EHOC), Community Development Corporations (CDCs) and other neighborhood-based organizations, agencies that provide services to vulnerable populations such as the International Institute, churches and community centers, public-facing City departments such as the Neighborhood Stabilization Team and the Citizens Service Bureau, social media networks such as Nextdoor, and local media outlets. The City of St. Louis should also consider developing clear, concise materials designed for "person-to-person" distribution, so that residents can easily make their friends and neighbors aware of Fair Housing Act and Landlord Tenant Law rights and regulations.

ACTION 6-A - Fair Housing Education:

The City should continue to support existing Fair Housing education and outreach. Organizations currently providing these services include the CREA and EHOC. It is critical that residents, property owners, property managers, financial institutions, and Realtors within the City of St. Louis are aware of their rights and/or

responsibilities under the Fair Housing Act. Additionally, it is important that residents are aware of the resources available to them if they suspect housing discrimination and would like to file a complaint.

One initial measure of success will include more materials about Fair Housing rights, responsibilities, and discrimination, with relevant translations, distributed to residents, property owners, property managers, financial institutions, and Realtors. Education and outreach with regards to Fair Housing rules, regulations, and discrimination will likely be most effective if educators attend existing meetings and network events where residents and/or stakeholders already gather. This may require a "train the trainers" strategy by the City of St. Louis. A second measure of success will include increased attendance at the CREA conference by organizations which work with people in protected classes or who providing lending or real estate related services. These efforts should commence in 2015 and will be ongoing.

ACTION 6-B - Tenants' Rights Education:

The City should set the goal of having information about tenants' rights provided with the lease every time that an apartment is rented in St. Louis, with particular attention paid to at-risk populations. This will need to be coordinated with the CREA and EHO, as well as agencies, such as the International Institute, that assist vulnerable populations in securing housing. Additionally, offices involved in the enforcement and evictions (such as the City Counselor's office, Police Department, and Sheriff's offices) should continue to ensure that all staff members are knowledgeable about Landlord Tenant law.

Additionally, CREA needs to actively recruit organizations working with people in protected classes to attend its annual conference, and have informational resources available and special sessions dedicated to disseminating information about fair housing laws and enforcement. These resources and sessions should be made available online and advertised online afterward.

One initial measure of success will include written materials about tenants' rights, with relevant translations, made available to renters and distributed to agencies that work with tenants and potential tenants within the City. Examples of these agencies include the International Institute, which assists immigrants with finding housing, and the St. Louis Housing Authority, which must turn away residents when its facilities are full. A second measure of success will include increased attendance at the CREA conference by organizations which work with people in protected classes. These efforts should commence in 2015 and will be ongoing.

Action 7: Eliminate discrepancies in the housing inspection requirements for tenants using standard payment methods versus tenants using Housing Choice Vouchers.

Per current St. Louis City regulations nearly all dwellings must secure a Housing Conservation District Inspection when changing ownership or tenancy. Dwellings that receive a Housing Choice Voucher as payment, however, are subject to an additional occupancy permit.

This policy has the unintended and undesirable consequence of putting Housing Choice Voucher holders at a disadvantage when seeking a landlord willing to rent to them. This discrepancy can be addressed most efficiently by eliminating the requirement of an additional occupancy permit for housing paid for using Housing Choice Vouchers, although it also could be addressed by expanding the requirement of the occupancy permit to all dwellings in the city.

This responsibility falls to the Board of Aldermen, with technical assistance from CDA, and success will be measured by a completed revision to the appropriate ordinance.

Action 8: Hold lending institutions accountable to community obligations and CRA regulations.

The City should continue to fund agencies providing fair housing resources, testing, and advocacy through the CDBG program. For example, the City currently funds the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC), which analyzes banks' lending performance based on CRA regulations and fair lending laws, seeking to ensure proper and beneficial behavior in St. Louis. Additionally, after major successes in recent years with increased outreach and hosting their first Fair Housing Conference, the largest of its kind in the region, the City of St. Louis Civil Rights Enforcement Agency (CREA) is well-positioned to be a more vigorous partner in and advocate for fair housing.

In addition, the City is working to address restricted access to credit by attracting banking services to underserved areas, utilizing subsidies if necessary. Encouraging additional retail branches and lending in underserved areas can serve as a "carrot" alongside the "stick" of holding banks accountable to CRA regulations. By pursuing both strategies simultaneously, the City is more likely to increase banking and lending presence in underserved areas.

This process is already underway, and will be ongoing. Success will be measured by increased banking and lending presence in underserved areas.

Action 9: Clarify the City's regulations regarding source-of-income discrimination by landlords.

Beyond protected classes identified by the Federal Fair Housing Act, St. Louis City Ordinance No. 67119, as amended, also prohibits discrimination Source of Income (with the caveat that the income source must be legal.) This means that Source of Income discrimination is prohibited when advertising for, screening, and selecting rental tenants. However, there is a lack of consensus about whether this Source of Income protection extends to Housing Choice Voucher/Section 8 renters, because in the case of Housing Choice Vouchers as a source of income, the income is not going directly to the renter, but rather to the landlord. Thus, to enforce Source of Income protection in the case of Housing Choice Voucher renters would require landlord participation in the Housing Choice Voucher program. Clarification from the Mayor's office and the Board of Alderman will give guidance to landlords and tenants, and will facilitate further research into policy and best-practices. Clarification could potentially take the form of a definition of Source of Income within Ordinance No. 67119 specifying that Housing Choice Vouchers are included as a protected source (provided further research supports this approach). Ordinance No. 67119 already defines other terms such as "disability" and "familial status," but does not currently clearly define "source of income," which has resulted in a lack of clarity regarding Housing Choice Voucher holders' rights under the regulation.

As Housing Choice Voucher holders are already burdened with numerous barriers to finding quality affordable housing, the addition/enforcement of legal protections against SOI discrimination could have a substantial,

positive impact on ensuring fair access to housing for low-income residents in St. Louis. These legal protections are feasible and sustainable in a city such as St. Louis. Numerous other cities have successfully passed and defended ordinances barring source-of-income discrimination in rental housing. The Chicago Fair Housing Ordinance, for example, bars discrimination based on source-of-income. It was passed in the 2000's and has been successfully defended in court. While Chicago's ordinance is overseen by its Commission on Human Relations, St. Louis' Equal Housing and Opportunity Council is well positioned and equipped to oversee and enforce such an ordinance in St. Louis.

This clarification should be made by the end of 2016, and success will be measured by obtaining an official statement from the Mayor's office and, if needed, a revision of city ordinances pertaining to housing discrimination.

Action 10: Encourage real estate agents to market the assets and opportunities available in St. Louis City.

The City should encourage realtors to give a balanced representation of the City's assets and opportunities when advising potential home buyers in the area. This is particularly relevant with regards to school choices for residents of the City, which include various charter and private school options and an increasing number of public schools regaining accreditation.

The City should work with the Missouri Real Estate Commission and the St. Louis Association of Realtors to accomplish this task. Both of these entities oversee real estate agents in the area and provide continuing training opportunities for these agents. The City should present relevant information about assets and opportunities at these trainings, particularly at the New Member Orientations required by SLAR, and should provide informational materials at such events and through the agencies' websites.

The City also should better utilize its own website, specifically the "Live and Work" section, to explain and market the assets and opportunities that are available to potential homebuyers. A similar website called *Live Baltimore* can be used as a model of effective City marketing via the internet.

These steps can be planned and implemented by the end of 2015, and updated and repeated yearly thereafter.

Action 11: Make housing more accessible to residents with disabilities.

The Affordable Housing Commission and the Community Development Administration can influence the supply of accessible housing units through their funding of new housing construction and housing rehabilitation. While these agencies should continue to require an allotment of accessible units for any housing development that they fund, as AHC already does, they should also more fully embrace Universal Design standards as they award housing development funds. Universal Design works to make housing units accessible to all potential residents, and thus increases the supply of accessible units without needing to create a specific "set aside" of units for residents with disabilities.

As a part of this process, it is advisable that the AHC and CDA continually review their goals for accessible housing as updated census data is released, to ensure that these goals are properly aligned with the needs of St. Louis' population of disabled residents.

These agencies, along with EHOC, can also encourage landlords with accessible apartments to list those apartments on the Social Serve website (www.socialserve.com), in order to facilitate better communication between residents with disabilities and tenants with accessible apartments.

These steps are underway and should be ongoing. Success will be measured by the development of updated goals for residence accessibility and by increased listings of accessible units on the Social Serve website.

Action 12: Continue partnerships and planning to improve the regional public transit outlook.

Since the issue of transit is such a large regional issue, it is important that the City continue its efforts of regional transportation planning with Metro and through organizations like the East-West Gateway Council of Governments. Regional cooperation must be accomplished to properly address the issue.

The City of St. Louis could pledge to support Transit-Oriented Development (TOD) around existing light rail stops, perhaps in cooperation with St. Louis County as one small step in the process. TOD includes concentrating development around public transit to increase the density of the population and therefore the frequency of the service. An official policy supporting TODs in the City could mean new housing located with transit service at the doorstep. Further, since TODs encourage "mixed use" environments, jobs could be created merely by the shops, restaurants, and offices that are typically a part of these developments. In addition, key bus lines, such as the 70 Grand, could be upgraded into Bus Rapid Transit to make them function more like light rail without the associated infrastructure costs.

Conclusion

Strengths and Opportunities

Downtown Revitalization

In the last decade there was a push to rehabilitate commercial and industrial spaces to create unique housing that is especially attractive to a younger demographic. The City fostered this development by changing zoning to foster the changing needs in the downtown area. As a result, the areas near downtown saw the largest percentages of population increase in the City. Further, many of these rehabilitated downtown units received Low Income Housing Tax Credits, establishing income restrictions for occupants and preserving affordability in an area with plentiful access to employment and public transportation.

Regional Collaboration

The City of St. Louis is committed to affirmatively furthering fair housing within its boundaries. However, patterns of segregation and investment/disinvestment are regional in nature and do not respect jurisdictional boundaries. Fortunately, the level of collaboration between the City and surrounding jurisdictions has increased significantly in the past decade, allowing the region to tackle challenges together. As mentioned earlier, the St. Louis Economic Development Partnership is a collaboration between the economic development agencies of the City of St. Louis and St. Louis County and the private sector, working to align and advance economic development efforts across the region. The OneSTL Plan for Sustainable Development, spearheaded by the East West Gateway Council of Governments and produced utilizing a HUD Sustainable Communities Grant, is a regional document that outlines what the people of St. Louis want for the future of the region as well as strategies, tools and resources for achieving the OneSTL Vision. The OneSTL Plan includes a Fair Housing Equity Assessment (FHEA) that jurisdictions throughout the region – including the City – can refer to in order to plan for investments that affirmatively further fair housing. Additionally, the City and County are currently collaborating on a Promise Zone application, demonstrating a commitment to working together to solve regional issues.

Strengthened Community Development Sector

Much of the work around the provision of housing and services within neighborhoods begins with the involvement of Community Based Development Organizations as well as community development intermediaries. Fortunately, the community development sector is becoming stronger in the City of St. Louis. The community development intermediary Rise Community Development (formerly RHEDA), has a long track record of building Community Development Corporation capacity as well as serving affordable and mixed income housing development needs in the City of St. Louis. Additionally, the Community Builders Network (CBN), a professional association of nonprofit community building organizations, was formed in 2011 to further the goal of building vibrant neighborhoods where people want – and can afford – to live. Alongside organizational capacity building, local research – such as Swanstrom and Webber's work on "Rebound Communities" – has helped the St. Louis region better understand how to operationalize success in neighborhood building.

Affirmatively Furthering Fair Housing Choice

As this AI has identified, the City of St. Louis will have to face many challenges in order to achieve the goal of affirmatively furthering fair housing choice. However, the City of St. Louis can build on recent improvements, City strengths, and opportunities to affirmatively further fair housing choice moving forward. The Summary of Recommendations included in this AI can serve as an easily understandable roadmap – for both policymakers and the public – in order to focus efforts and advance fair housing choice in the near future.

APPENDIX A

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APPENDIX B

City of St. Louis
Analysis of Impediments to Fair Housing Choice

Name: _____

Organization: _____

Title: _____

ORGANIZATIONAL INFORMATION

What is the nature of the mission of the organization? Please include which of the protected classes you serve (age, sex, race, religion, national origin, familial status, and disability) _____

Is the organization a public or private entity? _____

What services does the organization provide directly related to housing? _____

Does the organization have a particular geographic Area of Focus, such as a particular neighborhood (Baden, Central West End, e.g.) or region of the City (North, South, etc.)? If so, please list that Area of Focus below:

PUBLIC SECTOR IMPEDIMENTS

Zoning & Site Selection

What impact do you feel that zoning policies and new development site selection, including opposition by residents (NIMBYism), have on free and equal access to housing in the City of St. Louis?

Please rate the following factors with regard to the level of impact that each has on Fair Housing in the City, by placing a number on the blank with 5 being a very positive effect and 1 being a very adverse effect.

Positive Effect		Neutral Effect		Adverse Effect	No Opinion
5	4	3	2	1	0

- Zoning: _____
- Site Selection: _____
- NIMBYism: _____
- Building Codes: _____
- Housing Conservation Inspections/Occupancy Permits: _____
- City Land Use Policies: _____
- Real Estate Taxes: _____

Comments and/or Suggestions for Improvement

Municipal Services, Revitalization, Neighborhood Services

What impact do you feel that the availability of municipal services has on free and equal access to housing in the City of St. Louis? Please note that "municipal services" refers to basic services residents of the City expect to be provided, such as sanitation, water, streets, fire and police protection.

Please rate the following factors with regard to the level of impact o the availability of Fair Housing for the protected classes in the City of St. Louis, by placing a number on the blank with 5 being a very positive effect and 1 being a very adverse effect.

Positive Effect		Neutral Effect		Adverse Effect	No Opinion
5	4	3	2	1	0

Transportation: _____

Social Services for Families and Children: _____

Social Services for Elderly: _____

Social Services for Disabled: _____

Educational Institutions: _____

Hospitals, Clinics, and Other Health Services: _____

Financial Institutions: _____

Retail stores: _____

Comments and/or Suggestions for Improvement

Assisted Housing

What impact do you feel that the availability housing vouchers has on free and equal access to housing in the City of St. Louis?

What impact do you feel that the availability and location of subsidized housing has on free and equal access to housing in the City of St. Louis?

Please rate the following factors with regard to the level of impact that the availability of each has on Fair Housing in the City?

Positive Effect	Neutral Effect	Adverse Effect	No Opinion		
5	4	3	2	1	0

St. Louis Housing Authority Application and Selection Process: _____

Other Low-Income Housing Application and Selection Processes: _____

Geographic Location of Available Units: _____

Rent Rates: _____

Comment and/or Suggestions for Improvement:

PRIVATE SECTOR IMPEDIMENTS

Real Estate Practices

What impact do you feel real estate policies and practices have on free and equal access to housing in the City of St. Louis?

Lending Policies and Practices

What impact do you feel lending policies and practices have on free and equal access to housing in the City of St. Louis?

Please rate the following factors with regard to the level of impact that the availability of each has on Fair Housing in the City?

Positive Effect	Neutral Effect	Adverse Effect	No Opinion
5	4	3	2
			1
			0

Home Purchase Lending _____

Refinancing Home Loan _____

Foreclosure Practices _____

Appraisal Practices _____

Comments and/or Suggestions for Improvement:

PUBLIC AND PRIVATE SECTOR IMPEDIMENTS

Fair Housing Enforcement

What impact do you feel that fair housing enforcement has on free and equal access to housing in the City of St. Louis?

Please rate the following factors with regard to the level of impact that the availability of each has on Fair Housing in the City?

Positive Effect	Neutral Effect	Adverse Effect	No Opinion
5	4	3	2
			1
			0

Structure and Process of the Fair Housing Enforcement Program: _____

Efficacy of the Fair Housing Enforcement Program: _____

Comments/Suggestions for Improvement:

Information Programs

What impact do you feel that public information programs have on free and equal access to housing in the City of St. Louis?

Comments/Suggestions for Improvement:

Visitability

Visitability is a housing design movement to change home construction practices so that virtually all new homes, whether or not designated for residents who currently have mobility impairments, offer three specific accessibility features, included at least one zero-step entrance on an accessible route from the driveway or sidewalk, all interior doors be at least 31 ¾ inches wide, and at least a half bathroom on the main floor.

What impact do you feel that the concept of visitability has on free and equal access to housing in the City of St. Louis?

Comments/Suggestions for Improvement

Please rate the level of need for Fair Housing among the following groups of individuals, using the following scale:

Very High/Urgent	High	Moderate	Low	Very Low/None	No Opinion
5	4	3	2	1	0

Immigrants/Foreign Born: _____

Persons with Physical Disabilities: _____

Persons with Mental Disabilities: _____

Extremely Low Income: _____

Low Income: _____

Moderate Income: _____

Median Income: _____

Above Median Income: _____

White: _____

African American: _____

Hispanic: _____

Asian: _____

Other Minorities: _____

Families with Children: _____

Very Large Families with Children: _____

Elderly: _____

Religious Minorities: _____

Comments/Suggestions for Improvement: _____

APPENDIX C

Survey Results Summary

Representatives of 47 various housing organizations, social service agencies, lending institutions, universities, and governmental institutions were contacted (see Appendix D) to see if they would participate in a survey about fair housing. The survey asked a range of questions about possible impediments relating to public sector policies, municipal and neighborhood services, assisted housing, private sector real estate practices, and fair housing enforcement. The survey also asked visitability and which categories of people in protected classes are most in need of fair housing. Ten responses were received for a response rate of 20%. Some of the respondents were very critical and requested anonymity, and therefore the respondents are referred to generally rather than by specific organization.

Respondents were provided the below rating scale to rate a range of factors that may free and equal access to housing in the City of St. Louis. The respondents were also asked some open ended questions requesting their opinion about specific housing impediments and their suggestions for improvement.

Positive Effect	Neutral Effect	Adverse Effect	No Opinion
5	3	1	0
4	2		

Zoning and Site Selection (Public Sector Impediments)

There was some variance of opinions about the public sector impediments: zoning, site selection, NIMBYism, building codes, Housing Conservation inspections, occupancy permits, City land use policies, and real estate taxes.

The following are the most common responses for each factor:

Zoning:	3
Site Selection:	2
NIMBYism:	1
Building Codes:	3
Housing Conservation Inspections/Occupancy Permits:	5
City Land Use Policies:	2
Real Estate Taxes:	3

The most positive factors that the respondents noted were inspections/occupancy permits and real estate taxes. While the most common response was a neutral impact on real estate taxes, the second most common response was a 5. One respondent commented, "The current building code and plan review process seems to have improved Fair Housing Act accessibility compliance in recent years. The Affordable Housing Commission building standards have led to the creation of some units that are "visitable" and this is encouraging. However, the city could adopt visitability standards to improve accessibility."

NIMBYism is the factor that nearly universally was thought to have an adverse impact on fair housing access. NIMBY is an acronym for Not In My Backyard, and it refers to residents' resistance to certain types of development in their area. The respondents' comments indicated that there was some variance in the level of impact that this has on housing development. One respondent noted, "NIMBYism is fairly rampant, where housing includes people with disability, and this impedes the ability of disabled persons to assimilate themselves within our society." However, another respondent found NIMBYism less debilitating, "The impact of zoning requirements and NIMBYism on equal access to housing in the City is minimal and limited to pockets within the City. There is some opposition to housing for special needs populations but this is usually easily overcome."

Zoning, building codes and City land use policies had the most variance in responses. Building codes had such a variance in responses that no trend can be determined. However, zoning and the City's land use policies trended toward being adverse factors. Some of the comments add clarification that additional planning and control would aid in housing development. One respondent noted, "The City should have more centralized planning for the redevelopment of business corridors, transportation hubs and affordable housing."

Municipal Services, Revitalization, Neighborhood Services

There was a general consensus that City and neighborhood services aid the free and equal access to housing in the City of St. Louis. Below are the factors that the respondent was asked to rate and the most common response:

Transportation:	<u>5</u>
Social Services for Families and Children:	<u>5</u>
Social Services for Elderly:	<u>5</u>
Social Services for Disabled:	<u>5</u>
Educational Institutions:	<u>5</u>
Hospitals, Clinics, and Other Health Services:	<u>5</u>
Financial Institutions:	<u>5</u>
Retail stores:	<u>5</u>

The respondents indicated that all of these factors had a positive effect on housing accessibility when there was access to quality service close to home. There were some negative ratings for educational institutions, financial institutions and retail stores. One respondent noted, "The City is a good provider of local services for the most part. Compared to other surrounding municipalities, city residents have excellent services at a very low cost. What is lacking in the City is access to quality education for young families. This hurts families of all income levels, but mostly those who are unable to send their children to private schools."

Another respondent noted how important public transportation was to low income individuals, "It is a positive effect when housing is served by a frequently running bus route, a very negative effect when bus service is limited access due to distance of bus stop and limited times of bus service. This severely limits employment opportunities for lower income residents of the city."

Assisted Housing

Respondents were asked about their opinions about the availability of housing vouchers and subsidized housing. Below are the factors that the respondent was asked to rate and the most common response:

St. Louis Housing Authority Application and Selection Process:	1
Other Low-Income Housing Application and Selection Processes:	1
Geographic Location of Available Units:	2
Rent Rates:	3

The comments offered reflected the general negativity of the responses above. The respondents expressed frustration with the waiting list and the great need for vouchers that goes unmet. One respondent commented, "There are not enough Section 8 housing vouchers, public housing or project-based subsidized housing to fill the need for low-income housing. However, this is something that the City has little control over. The City could investigate the possibility of using some of its CDBG or HOME funds to operate its own voucher program to increase the availability of vouchers."

There were other concerns expressed about subsidized housing. One respondent noted, "Subsidized housing is fairly widely available in St. Louis given the size of its population. In some cases however, it is overly concentrated and has a negative effect on its tenants and the surrounding community." Another respondent had the opposite opinion, "Application and selection process is mute point when there are no openings-we have very few clients getting into public housing etc-most are going into transitional housing programs run by non-profits."

Private Sector Impediments

The survey asked about the impact of real estate and lending practices on the free and equal access to housing in the City of St. Louis. Below are the factors that the respondent was asked to rate and the most common response:

Home Purchase Lending	1
Refinancing Home Loan	4/1
Foreclosure Practices	1
Appraisal Practices	3

The most common responses are a little deceptive, in this case. About half of the respondents noted that lending and real estate practices had negative impacts and about half noted positive impacts. Several comments about the schools impacting real estate agents steering clients from the City were noted. One respondent offered this insight, "Educational opportunities may be the most important factor for families in determining where to live. Unfortunately, real estate agents may not be aware of some of the excellent educational opportunities in the City of St. Louis, and many prospective buyers are steered away from the City because of the loss of state accreditation of the St. Louis Public Schools. There are a number of struggling schools within the SLPS system which need to be improved. There are a number of excellent schools within SLPS, as well as charter and private schools. There are also opportunities to participate in the voluntary choice program. If prospective residents to the area had a better awareness of the opportunities, it might attract more new residents."

Lending practices were under fire by the respondents. Many noted unfair practices and there was a call for governmental control. Comments noted systemic problems, "Lending policies and practices of larger financial institutions have a significant impact on the availability of affordable housing in the St. Louis area. Residents of minority-impacted low-income communities are essentially redlined because of the low property values in their neighborhoods and the lack of sensitivity on the part of the lenders to the specific issues that affect underwriting in these areas." Others noted some unfair practices, "The effect of the ability of homeowners to refinance a home loan is positive as this affords them more available cash for other necessities in life, such as food and clothing. Foreclosure practices have a strong adverse effect for city residents as lenders won't foreclose on properties in crime infested areas. Thus, the homeowner cannot move to other housing and continues to get deeper in debt."

There were several suggestions for governmental intervention. The suggestions ranged from the City moving its accounts to banks with favorable lending practices to tighter regulation of the banking industry to establishing a rating system of lenders. Another respondent offered, "The City should also keep a database on REO properties to ensure that lenders are maintaining properties equally in all neighborhoods, regardless of racial makeup of the neighborhood."

Fair Housing Enforcement

The survey inquired about the impact that fair housing enforcement has on the free and equal access to housing in the City of St. Louis. Below are the factors that the respondent was asked to rate and the most common response:

Structure and Process of the Fair Housing Enforcement Program:	5
Efficacy of the Fair Housing Enforcement Program:	5

There was a general consensus that the City does have a positive impact on fair housing with enforcement. However, it is important to note that about a quarter of the respondent responded with "no opinion." One respondent noted, "If fair housing was enforced it would have sufficient impact." While this is a minority comment, it is important to note that some respondents are unaware of the enforcement options offered, and continued outreach to organizations and residents is needed.

Overall, the comments were very positive about Fair Housing enforcement in the City. One respondent noted, "Fair housing enforcement in St. Louis is robust and has a positive impact on equal access to housing." Another respondent noted the importance of enforcement, because it "keeps landlords informed and accountable regarding renting practices and helps renters/buyers hold them accountable as well."

Visitability

Visitability is a housing design movement to change home construction practices so that virtually all new homes, whether or not designated for residents who currently have mobility impairments, offer three specific accessibility features, included at least one zero-step entrance on an accessible route from the driveway or sidewalk, all interior doors be at least 31 ¾ inches wide, and at least a half bathroom on the main floor.

Respondents were asked to comment on the impact of the concept of visitability on free and equal access to housing. The comments varied considerably. Some thought that it would be difficult to achieve with the aging housing stock in St. Louis. Others thought that it would be better to encourage rather than mandate. One respondent noted, "Any visitability policy implemented by the City should be fair and not onerous to the owner/developer."

Another respondent rejected the notion of visitable housing in favor of universal design, "We DO NOT NEED visitable housing. We NEED LIVABLE housing. Visitability is a shortsighted concept that only provides housing units be visitable. We need housing that you can **live in** and if we use Universal Design as the housing standard for new construction and gut rehabs in the city we also create more housing choice for people. Anyone can buy or rent Universal Housing and therefore, people with disability or families who have a disabled member of friend can choose a universal home wherever it exists and not have to wait for an accessible home to be built" (all emphasis original).

Still other commented that it would create housing that was beneficial for everyone, "This would be great. It is for all ages and all abilities! It is perfect for those with disabilities, but also allows individuals to age in place – which is what seniors want and it is ideal for parents with young children."

Need For Fair Housing

The survey asked respondents to rate the level of need for Fair housing among certain groups using the below scale. Below are the factors that the respondent was asked to rate and the most common response:

Very High/Urgent	High	Moderate/Low	Very Low/None	No Opinion	
5	4	3	2	1	0

Below are the factors that the respondent was asked to rate and the most common response:

Immigrants/Foreign Born:	5
Persons with Physical Disabilities:	5
Persons with Mental Disabilities:	5
Extremely Low Income:	5
Low Income:	5
Moderate Income:	5
Median Income:	5
Above Median Income:	5
White:	5
African American:	5
Hispanic:	5
Asian:	5
Other Minorities:	5
Families with Children:	5
Very Large Families with Children:	5
Elderly:	5
Religious Minorities:	5

The respondents were very reluctant to set priorities based on classes of people. There was a little less concern among some respondents for moderate income to above median income households need for fair housing. The comments noted that everyone needed fair housing. A typical comment offered, "The level of need for Fair Housing is equal among all groups of individuals."

APPENDIX D

Organizations Contacted

Governmental

- City of St. Louis Board of Aldermen
- City of St. Louis Mayor's Office
- City of St. Louis Planning and Urban Design Agency
- City of St. Louis Affordable Housing Commission
- Governor's Council on Disabilities
- Federal Reserve
- Civil Rights Enforcement Agency

Housing Advocates

- Metropolitan St. Louis Equal Housing Opportunity Council
- Places for People
- Housing Resource Center
- Kathy J. Weinman Children's Advocacy Centre
- Paraquad
- Starkloff Institute
- Affordable Housing for Missourians
- Beyond Housing
- Rainbow Village
- St. Louis Transitional Hope House
- Affordable Housing Task Force
- Doorways
- Missouri Workforce Housing Association
- Grand-Oak Hill Community Housing Corporation
- DeSales Community Housing Corporation
- Northside Community Housing Corporation
- Catholic Commission on Housing
- St. Andrew's Resources for Seniors
- Our Lady's Inn
- Missouri Association for Social Welfare
- Lutheran Family and Children's Services
- Cardinal Ritter Senior Services
- Housing Funders Network

Lending Institutions

- St. Louis Equity Fund
- Fannie Mae
- Bank of America
- US Bank
- PNC Bank
- Wells Fargo Bank
- Morgan Keegan

Real Estate

- Brown Kortkamp Realty
- Duffe/Nuerenberger Realty
- McCormack Baron Salazar
- Reed Real Estate
- Gundaker Realty Group
- St. Louis Association of Realtors

Universities

- University of Missouri-St. Louis
- Saint Louis University
- Washington University

Other Service Providers

- Metro
- Legal Services of Eastern Missouri
- Mental Health Association

APPENDIX E

On November 6, 2014, from 9:00 am to 11:00 am, the Community Development Administration hosted an Action Strategy Workgroup Meeting facilitated by Tim Brieihan from H3 Studio and Stephen Acree and Eleanor Tutt from Rise Community Development in order to identify and prioritize action steps to alleviate impediments to fair housing choice. The following notes summarize that meeting

Workgroup Meeting Attendees:

- Matt Mourning (City of St. Louis Planning and Urban Design)
- Justin Jackson (City of St. Louis Homeless Services Division)
- April Ford Griffin (City of St. Louis Affordable Housing Commission)
- Charles Bryson (Civil Rights Enforcement Agency)
- Denise Jefferson (Civil Rights Enforcement Agency)
- Cheryl Lovell (St. Louis Housing Authority)
- Dr. Molly Metzger (Washington University in St. Louis)
- Serena Muhammad (St. Louis Mental Health Board)
- Bill Rataj (City of St. Louis Director of Housing Programs)
- Matt Sisul (City of St. Louis Community Development Administration)
- Booker Gillam (International Institute)
- Kim Lackey (Paraquad)
- Reverend Eugene Fowler

Workgroup Hosts/Facilitators:

- Fred Wessels (City of St. Louis Community Development Administration)
- Alana Green (City of St. Louis Community Development Administration)
- Tim Brieihan (H3 Studio)
- Stephen Acree (Rise Community Development)
- Eleanor Tutt (Rise Community Development)

Key discussion points:

- The City should consider more strategic use of TIF, Tax Abatements, and/or CDBG/HOME resources as leverage in order to encourage developments that affirmatively further fair housing. However, in many cases, by necessity, City-provided subsidy “follows” Low Income Housing Tax Credits, which are the single largest tool for affordable housing development.
- While locating housing in areas of opportunity is an important strategy, rebuilding existing neighborhoods and strengthening the urban core is also critical. Focusing too much on regional areas of opportunity at the expense of current City neighborhoods may limit support in currently impacted areas and exacerbate disparities.
- Beyond provision of housing, the City must address current social conditions in impacted areas, including health disparities.
- There is a very low inventory/low availability of 3 and 4 bedroom affordable apartments. Funding priorities for large units are needed.
- City has a policy of requiring a 2nd inspection/occupancy permit for Section 8 tenants – which tenants without vouchers do not have to obtain. This causes challenges for both landlords and tenants. Additionally, many landlords don’t understand the benefits of Section 8 and more education is needed.
- There are upper limits on Section 8 payments, and non-impacted areas have market rate rents above those limits, so even with a voucher, it is difficult to move to strong market areas. Allowing non-related individuals to live together utilizing vouchers could help.
- Does source-of-income protection include Section 8 income protection? Is there a way to clarify that it does? The Poverty and Race Research Action Center may have resources.
- To combat NIMBYism, we must educate on the benefits of diverse neighborhoods BEFORE housing developments are proposed for those neighborhoods – throughout the city, all year.

- Landlords threaten to call Immigration Services when New Americans lodge complaints; there needs to be better enforcement of tenants rights.
- Zoning laws can be used to require affordable housing inclusion, although that strategy may work better in strong market cities (or strong market neighborhoods within the City?)
- Job housing mismatch is a major challenge, and it is being made more challenging by Federal Government jobs leaving the City. Jobs aren't always on existing bus lines. Economic development and housing should occur in tandem – and job training needs to help people within walking distance of new jobs qualify for them.
- The Live Baltimore website helps educate potential renters and homebuyers on the assets within different neighborhoods. A similar site for St. Louis could help reduce issues of private sector bias or lack of information about neighborhoods.
- With limited resources, we need to preserve existing housing stock.
- Neighborhood residents deserve to know about developments proposed for their communities, and they must be informed in a way that doesn't encourage additional NIMBYism. Ideas include some required/automatic public sector process for reviewing development, City financing tools requiring an engagement process, posting a notice on sites to be developed (or not; this was controversial).
- There is a challenge in finding accessible housing units. However, the issue is more complex than a simple undersupply. While developers should be encouraged to add accessible and universal design units to their inventory, developers and disability advocates frequently have trouble matching households in need of an accessible unit to existing units, resulting in accessible units being occupied by households without disabilities. There needs to be a better organizational referral system. Additionally, infrastructure/sidewalk improvements may be needed: "If you can't get between the front door of your home and the bus stop, that's not accessibility."

APPENDIX F

COMMUNITY DEVELOPMENT ADMINISTRATION

Four-Factor Analysis and Language Access Plan For Persons with Limited English Proficiency

© City of St. Louis
Community Development Administration
1520 Market Street – Suite 2000
Phone 314.657.3700 • Fax 314.613.7012

Introduction

This Language Assistance Plan (LAP) has been prepared to address the Community Development Administration's (CDA) responsibilities as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, which indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. The Executive Order, which applies to all state and local agencies which receive federal funds, directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place.

Plan Summary

As the administrator of the Community Development Block Grant and HOME Investment Partnership programs for the City of St. Louis, CDA has developed this LAP to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided by CDA. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify persons with LEP that assistance is available.

Four-Factor Analysis

In order to prepare this plan, CDA undertook the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CDA administered program, activity or service.
2. The frequency with which LEP persons come in contact with CDA programs, activities or services.
3. The nature and importance of programs, activities or services provided by CDA to the LEP population.
4. The resources available to CDA and the overall costs of providing LEP assistance.

A summary of the results of the CDA four-factor analysis is in the following section.

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CDA program, activity or service.**

CDA staff reviewed the 2007-2011 American Community Survey Estimates and determined that approximately 27,508 persons in the City of St. Louis (9.3% of the population) speak a language other than English. In the City of St. Louis, approximately 14,082 persons (4.7%) have Limited English proficiency; that is, they speak English less than "very well".

In the City of St. Louis, of those persons with Limited English proficiency, approximately 4,057 (1.4%) speak Spanish; 4,663 (1.6%) speak other Indo-European languages; 3,444 (1.2%) speak Asian and Pacific Islander languages; and 1,918 (.6%) persons speak other languages.

2. The frequency with which LEP persons come in contact with CDA programs, activities or services.

CDA assessed the frequency with which staff have, or could have, contact with LEP persons. A polling of program staff generally demonstrated rare contact with LEP persons. However to date, the most frequent contact between LEP persons and staff occur in the following programs: Home Repair, Residential Development and Section 3. CDA provides home repair funding to low to moderate income households, some of which are headed by LEP persons. Staff report that over the last five years, over 100 (approx.) clients were LEP persons. Through its residential development section, CDA works with developers and contractors, some of whom are LEP persons. Interaction with LEP persons through the residential development section averages approximately 2-3 per year. Through the Section 3 program, CDA certifies low- and very- low income persons as “Section 3 Workers” as a tool to foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program monitor reports interacting with LEP persons approximately 10 times over the last five years. Based on the staff assessment, Spanish, Chinese, Japanese and Bosnian are the languages frequently encountered.

In addition to the above, because all citizen participation activities are open to the general public, CDA may encounter LED persons during the Consolidated Plan and Annual Action Plan processes, in particular.

3. The nature and importance of programs, activities or services provided by CDA to the LEP population.

CDA’s main objectives are to foster neighborhood stability, to utilize funds for physical improvements and housing rehabilitation, to encourage business development and jobs, and to foster increased housing production and home ownership, especially for low to moderate income families. All HUD programs are geared toward these objectives and to that end, these programs and activities are highly important. Additionally, it is important that information relating to these programs is available in a reasonable manner to all citizens, particularly those with Limited English Proficiency.

4. The resources available to CDA and the overall cost to provide LEP assistance.

CDA considered its available resources that could be used for providing LEP assistance, including existing services offered through the City of St. Louis and professional interpreter and translation service to be utilized on an as-needed basis. In addition, CDA considered which documents would be the most valuable to be translated if the need should arise and took an inventory of available organizations with which CDA could partner for outreach and translation efforts. Based on the four-factor analysis, CDA developed its Language Access Plan as outlined in the following section.

Language Access Plan

As a result of the preceding Four-Factor Analysis, CDA has identified the following types of language assistance to be provided throughout the implementation of its CDBG and HOME programs:

1. Website Translation Services: The City of St. Louis' dynamic website offers translation services that can be used by LEP persons. As a part of this effort, CDA's departmental website can be translated into approximately 80 different languages, including Spanish, Chinese, Japanese and Bosnian. CDA will publish all meeting notices and announcements on the website to facilitate LEP persons' involvement in the citizen participation process.
2. Oral Translation Services: CDA will provide translation services on an as-needed basis to assist citizens participating in HUD-funded programs, including home repair, residential development projects and Section 3 certifications. Although it is CDA's intention to assist all LEP persons with translation services, CDA will ensure that these services are available in Spanish, Chinese, Japanese, and Bosnian.

CDA will publicize this amenity on its website, as well as notify organizations that work with LEP persons, such as the International Institute, Hispanic Chamber of Commerce, and the Eritrean Community of St. Louis. In addition, all citizen participation notices will include a statement that translators will be available at public meetings upon prior request.

3. Vital Document Translation: CDA will ensure that all vital documents are translated into Spanish, Chinese, Japanese and Bosnian. These documents include all those necessary to facilitate the citizen participation process (public meeting notices, announcements, and draft and final Consolidated Plans and Annual Action Plans), program application instructions, flyers and agendas.

Staff Development and Training

CDA will provide training to staff on this plan, as well as staff cultural awareness training to provide a better understanding of, and sensitivity to, the various cultural groups to ensure equal delivery of services.

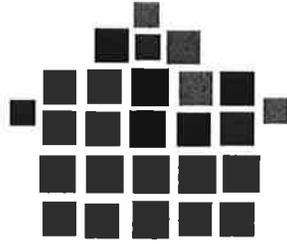
Updating the LAP Plan

CDA will update the LAP when new Census data becomes available, or when it becomes clear that higher concentrations of LEP persons are present in the City of St. Louis.

ADOPTED:

Fred Wessels
Executive Director

APPENDIX G



ST. LOUIS
HOUSING
AUTHORITY

Affirmatively Furthering Fair Housing Analysis

I. Introduction

As a public housing authority (PHA), the St. Louis Housing Authority (SLHA) is required to submit an annual Agency Plan to HUD for approval, in accordance with the requirements of 24 CFR §903. As part of the Agency Plan, SLHA is required to certify that it complies with certain civil rights requirements and certify that it will affirmatively further fair housing (24 CFR §903.7 (o)). To be considered in full compliance with the affirmatively furthering fair housing requirements, a PHA needs to fulfill the requirements of 24 CFR §903.2(b) and;

1. Examine its programs or proposed programs;
2. Identify any impediments to fair housing choices within those programs;
3. Address those impediments in a reasonable fashion in view of the resources available;
4. Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require PHA involvement; and
5. Maintain records reflecting these analyses and actions.

This document provides the required documentation to show SLHA's full compliance with the requirements to affirmatively further fair housing.

II. Fulfill the Requirements of 24 CFR §903.2(b)

Under the civil rights certification requirements at 24 CFR 903.7(o)(3), SLHA is required to fulfill the requirements of 24 CFR 903.2(b). 24 CFR §903.2(b) contains provisions that identify which public housing developments are subject to the requirements for deconcentration of poverty. This section does not impose any specific requirements on PHAs. However, 24 CFR §903.2(c) does impose specific requirements for implementation of deconcentration of poverty. SLHA assumes that the regulatory reference in 24 CFR §903.7(o)(3) is incorrect and that HUD's intention was to refer to the analysis requirements in 24 CFR §903.2(c). SLHA complies with HUD's deconcentration of poverty requirements under 24 CFR §903.2(c). The supporting documentation for the analysis is attached in Appendix A.

III. Examine SLHA's Programs and Proposed Programs

Neither HUD nor the public housing regulations offer any guidance for what an examination of a PHA program or proposed program entails under 24 CFR 903.7(o)(3)(i). To try to determine what an examination of its program is supposed to contain, SLHA reviewed references on HUD's website and materials published by advocacy organizations. The review of these materials suggest that the examination should include the following:

- A review of demographic information of program participants and applicants in relationship to the demographics of the community.

- An analysis of racially and ethnically concentrated areas of poverty in SLHA programs.
- A review of housing needs across protected classes.

SLHA has examined each of the three items as discussed below:

1. Demographic Review

SLHA operates two major HUD funded programs, public housing and Housing Choice Vouchers. The demographic information is shown in Tables 1-5 below.

Table 1
Racial Composition of Programs

Race	Public Housing				Housing Choice Vouchers			
	HOH	HOH %	Total Family Members	Total Family Members %	HOH	HOH %	Total Family Members	Total Family Members%
White	49	1.84%	61	1.02%	266	4.21%	409	2.46%
Black	2,605	97.68%	5,749	96.33%	6,026	95.36%	15,957	95.95%
Other	13	0.49%	158	2.65%	27	0.43%	262	1.58%

Table 2
Age of Participants in SLHA Programs

Age	Public Housing		Housing Choice Vouchers	
	Total Family Members	Total Family Members %	Total Family Members	Total Family Members%
1-17	2,630	44.07%	8,475	50.96%
18-61	2,711	45.43%	7,301	43.90%
62 and over	619	10.37%	848	5.10%

Table 3
Income Sources in SLHA Programs

Income Source	Public Housing		Housing Choice Vouchers	
	Number of Families	Percentage	Number of Families	Percentage
SSI	628	23.59%	1,752	27.75%
SS	948	35.61%	1,910	30.26%
Pension	162	6.09%	193	3.06%
TANF	226	8.49%	587	9.30%
Employment	842	31.63%	2,323	36.80%

Table 4
Average Income in SLHA Programs

Public Housing			Housing Choice Vouchers		
Average Income	Average Family Size	Percentage of Median	Average Income	Average Family Size	Percentage of Median
\$10,734	2.24	19.38%	\$11,447	2.63	18.39%

Table 5
Disabled in SLHA Programs¹

Public Housing	Housing Choice Vouchers
Percentage of Families Containing a Member with a Disability	Percentage of Families Containing a Member with a Disability
24.78%	20.07%

Both the public housing and HCV programs have long waiting lists. Families are allowed to be on multiple waiting lists at the same time. Therefore, the demographics for waiting list of both programs are combined and shown in Tables 6- 10 below.

Table 6
Racial Composition of the Waiting List²

Race	HOH	HOH %	Total Family Members	Total Family Members %
White	138	1.23%	238	0.89%
Black	11,023	98.03%	15,957	98.53%
Other	83	0.74%	262	0.57%

Table 7
Age of Participants on the Waiting List

Age	Total Family Members	Total Family Members %
1-17	15,694	48.99%
18-61	15,608	48.72%
62 and over	649	2.03%

Table 8
Income Sources of Families on the Waiting List

Income Source	Number of Families	Percentage
SSI	1,696	13.02%
SS	1,423	10.92%
Pension	85	0.65%
TANF	2,862	21.96%
Employment	4,972	38.16%

Table 9
Average Income of Families on the Waiting List

Average Income	Average Family Size	Percentage of Median
\$8,440	2.45	15.24%

¹ The number of persons with a disability is based on the number of persons receiving SSI. As SLHA is not allowed to inquire regarding the nature of the disability, SLHA has no data on the number of individuals that need special features in their unit.

² The last time the HCV waiting list was opened in 2007, a short form pre-application was taken. This process did not require the identification of racial composition for family members. Therefore, a significant number of family members are listed as race unidentified. For the purpose of this analysis, unidentified race is not considered.

Table 10
Disabled Families on the Waiting List³

Number of Families Claiming a Disability	Percentage of Families Claiming a Disability
933	2.91%

To compare SLHA programs to the surrounding community, SLHA used the Affirmatively Furthering Fair Housing (AF) performed by the City of St. Louis as its data source. It should be noted that the City’s AF was completed in March 2012, but is yet to be approved by HUD. The AF states the following information.

Race

The City of St. Louis is a racially diverse city with whites and African Americans being the two largest racial or ethnic groups. The City has had an African American majority population since the 2000 Census. The white population, representing a bare majority of the city in the 1990 Census, has declined dramatically from its post-war population peak. In 1950, over 700,000 white residents called the city home. By 2010, this number had dropped fully 80% to 140,000. The 1980 Census showed the first drop in the African American population. This trend has continued and has accelerated, with the 2010 Census showing a faster decline in the African American population than in the white population for the first time. In fact, despite an 8.1% decline of the white population between 2000 and 2010, the share of this population actually inched up from 43.8% to 43.9%.

Since the 1970s, the North Side has been largely African-American; while the South Side was predominantly white. The 2010 Census data reveals a growing and unprecedented level of integration in the southern portion of the City, while the northern section remains predominately African-American. The African American population grew most significantly in the south central and southeastern portions of the City. The share of African Americans also increased, to a lesser extent, in each of the southwest St. Louis neighborhoods, as well as in the northern extremes of the city. African American population declines were witnessed most heavily in several South St. Louis neighborhoods. The pattern is reversed for the white population, with whites showing substantial percentage gains in these areas and losses in the extreme southern and northern portions of the City.

Populations of other races and ethnicities reside largely in the southern half of the City. Hispanics tend to live in the southeastern portion of the city, with Asians residing primarily in south-central neighborhoods or the central corridor (e.g., Central West End). Most other racial groups are very small in number and constitute a small percentage of the overall population.

³ The number of disabled families is based on the number of families claiming a disability on the application.

The Racial Population Comparison (Table 11) shows the population breakdown by race of St. Louis City, St. Louis County, and the entire State of Missouri. St. Louis City and St. Louis County are separate political jurisdictions. St. Louis City and County taken together contain 22% of the population of Missouri. There are some similarities across the three jurisdictions. For instance, the Asian population is 2.9% of St. Louis City, 3% of St. Louis County, and 2% of the state as a whole, showing a very slight urban concentration. Looking at the white (non-Hispanic) and African American populations, however, one sees a distinct difference when comparing the three jurisdictions. Only 11% of the population of Missouri is African American, but the percentages increase in the population centers of St. Louis County (23%) and St. Louis City (49%). St. Louis City is the only county-equivalent (and the only major city) in the state of Missouri with the African-American population as the largest racial group.

Table 11
Racial Population Comparison

	St. Louis City		St. Louis County		Missouri	
Total Population	319,294		998,954		5,988,927	
White (non-Hispanic)	134,702	42.2 %	687,984	69%	4,850,748	81%
African American	156,389	49.0 %	231,801	23%	687,149	11%
American Indian	684	0.2%	1,632	0.2%	24,062	0.4%
Asian	9,233	2.9%	34,466	3%	97,221	2%
Two or More Races	6,616	2.1%	16,587	2%	106,142	2%
Other	540	0.2%	1,460	0.1%	11,135	0.2%
Hispanic	11,130	3.5%	25,024	3%	212,470	4%

Age

The population of St. Louis is comprised mostly of adults age 20 and over (75.5%), with 15.6% of the population being over the age of 60. The age spread for the City of St. Louis has some variations when compared to St. Louis County and the State of Missouri. St. Louis County and the State of Missouri are very similar when comparing the percentages in each age category, with the largest spread being 1.2%. The City's population makeup by age differs from that of the other two jurisdictions. The City has higher populations of people in their 20s and 30s, but lower percentages of people under 20 and over 60.

There has been a pronounced loss of children in the City over the past decade, except for the areas near downtown that experienced significant growth. The City lost roughly a third of its population age 5-14 from 2000 to 2010. Still, 67,539 children (under age 18) lived in the City as of April 1, 2010.

The young population is concentrated in the northern and southeastern sections of the city where the highest poverty rates exist. The Central Corridor has relatively few children.

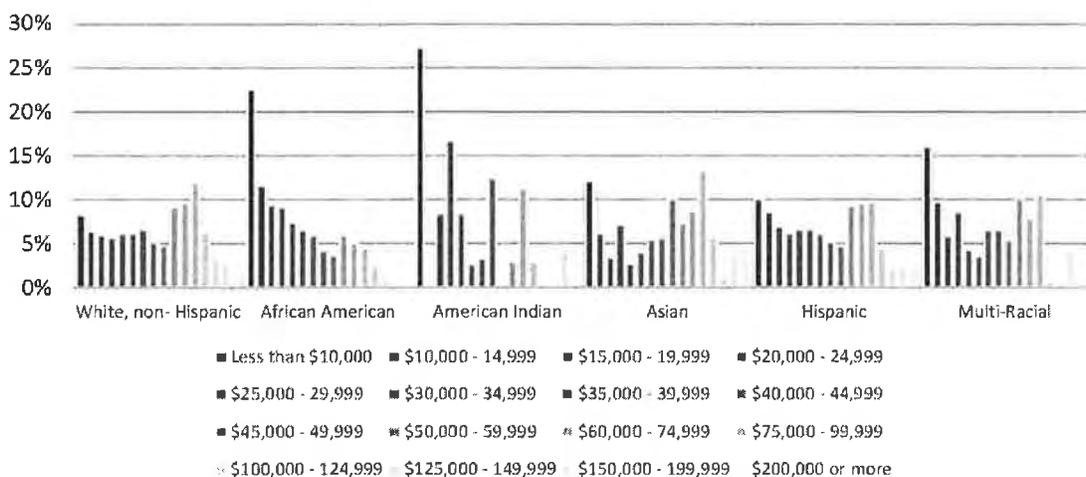
The elderly population consists of citizens who are 65 years old or older. The aging population presents unique challenges for the City of St. Louis. At about 16% of the population, the elderly comprise a smaller proportion of the population in the City than in St. Louis County and the State of Missouri. However, over half the City's elderly population have some sort of disability, and many require housing modifications and/or attendant care. Many elders live alone and are dependent on social services and nursing care in order to remain in their homes.

Income

Income is one of the greatest determinants of housing access. In this measure, St. Louis ranks well below its surrounding states and its suburbs. According to the 2005-2009 ACS, the median household income in the City of St. Louis was \$34,227, considerably less than the median income for the entire state of Missouri of \$46,005 and far less than the median income for St. Louis County of \$57,502. The table below highlights the disparity in income between the City of St. Louis and St. Louis County. In the City, 38% of households earn less than \$25,000 per year whereas in the County, 19.5% of households earn less than \$25,000. The disparity is even greater at the upper end of the income spectrum. For example, 24.6% of households in St. Louis County earn more than \$100,000, compared to 9.7% in St. Louis City.

Income distribution has an impact on the demand for low income housing. This demand is especially high for minorities, as the graph below demonstrates the variance of household income between different races and ethnicities. African Americans and American Indians have a much higher percentage of the population living with very low incomes.

Household Income Distribution in the City of St. Louis by Race/Ethnicity: 2009



Disability

About 14% of the St. Louis City population has some disability, exceeding the percentage in St. Louis County (11%) (2009 ACS). Of the working age population, about 13% are disabled, well above St. Louis County's 9% population of working-age disabled persons. There is an even larger discrepancy when comparing the population over 65. The estimated number of disabled elders soars to almost 44% of all elderly persons in the City, compared to 33% in the County. This creates a large challenge for the municipality to address the needs of an older population that shows significant rates of disability. The AI includes the table below.

Table 12
Disabled Population

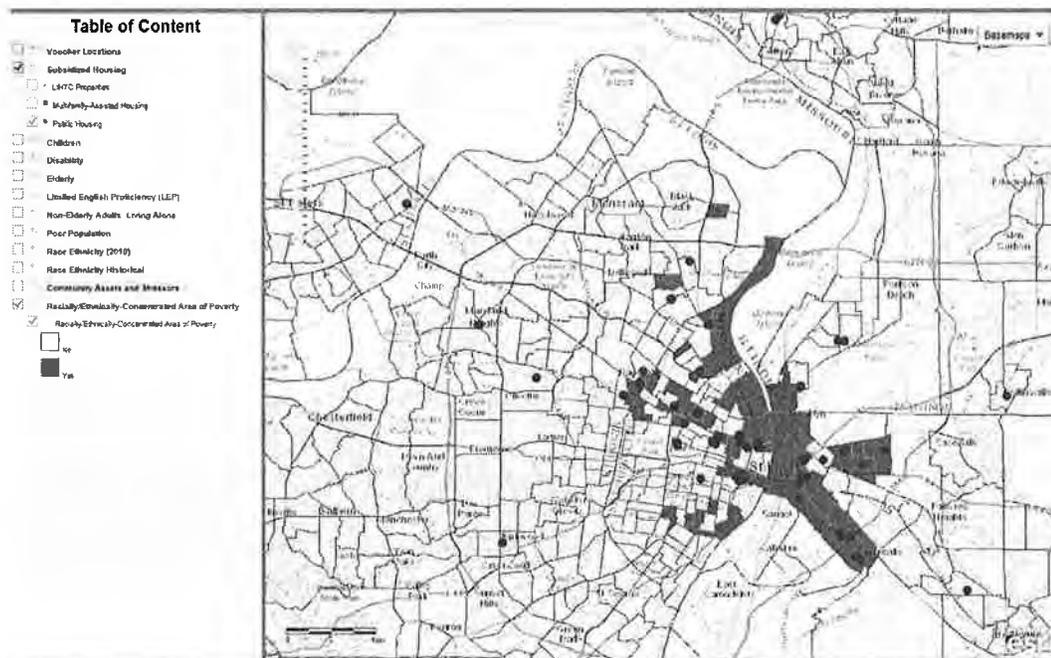
	Disabled Population from 18 to 64	Disabled Population 65 and Over
With any disability	13.4%	43.7%
With a hearing disability	1.6%	13.3%
With a vision disability	2.3%	8.7%
With a cognitive disability	6.8%	10.7%
With an ambulatory disability	7.2%	30.0%
With a self-care disability	2.7%	11.5%
With an independent living disability	5.1%	21.9%

It should be noted that neither the City's AI nor the American Community's Survey correlates disability and income, so it is difficult to determine the number of persons with a disability that qualifies for SLHA programs.

2. Analysis of Racially and Ethnically Concentrated Areas of Poverty in SLHA Programs

Public Housing

SLHA currently has 2,852 units of public housing. As SLHA's jurisdiction for public housing is only the City of St. Louis, the analysis includes only the City. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



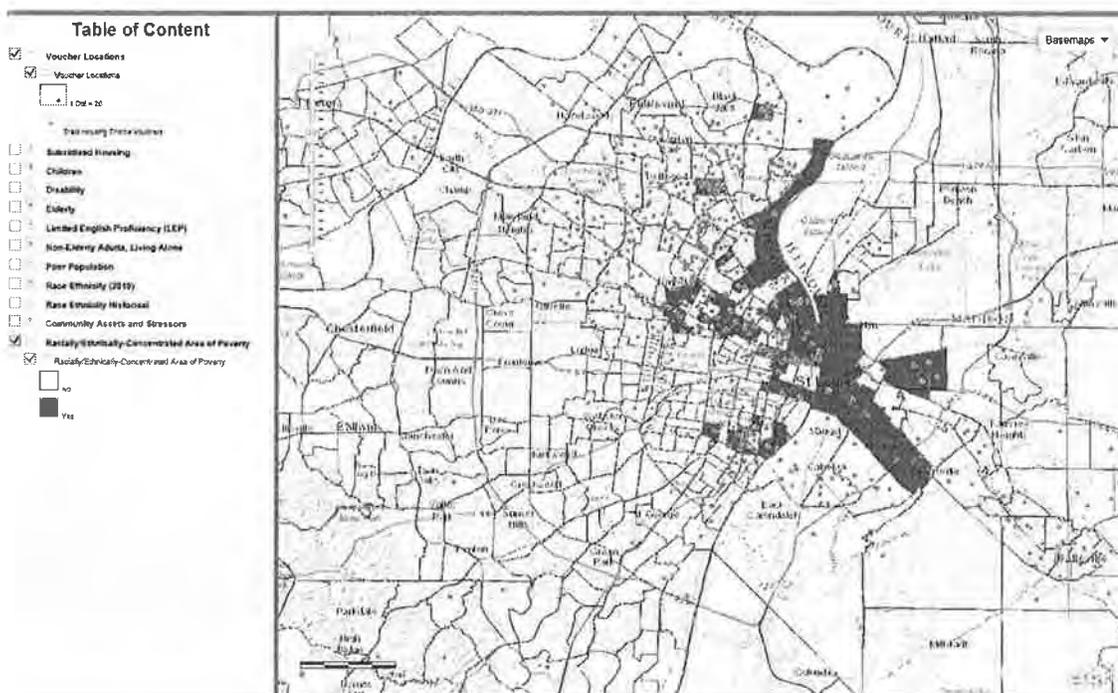
Of the 2,852 public housing units, 1,065 or 37% of the units are located outside census tracts identified as racially and ethnically concentrated areas of poverty and 1,787 or 63% of the units are located in census tracts racially and ethnically concentrated areas of poverty. Of the 1,787 units located in census tracts racially and ethnically concentrated areas of poverty, 693 or 24% of the units are located in mixed-finance/mixed-income developments.

Since 1999, SLHA has steadily worked to reduce the number of public housing units in racially and ethnically concentrated areas of poverty. In 1999, 78% of the public housing units were located in census tracts racially and ethnically concentrated areas of poverty. Since that time, SLHA has demolished or disposed of 2,702 public housing units. Of those units, 2,575 were located in census tracts racially and ethnically concentrated areas of poverty. In 15 years, there has been a 15% reduction in units located in census tracts racially and ethnically concentrated areas of poverty. SLHA's Agency Plan has goals to continue to develop additional housing using the mixed finance method and to remove an additional 143 public housing units that are located in a census tract that is a racially and ethnically concentrated area of poverty.

Housing Choice Vouchers

As of March 31, 2013, 6,739 vouchers were allocated to SLHA's HCV program. Of the allocated vouchers, 6,425 are currently leased. The utilization rate for the program is 101%. As the HCV program is budget based, SLHA must cease HCV lease-up until additional funding is available. Because of the mandatory federal budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program.

Unlike public housing, SLHA's jurisdiction for HCV is not limited to St. Louis City. SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of choices of housing areas. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



As the map indicates, many vouchers are currently utilized outside of racially and ethnically concentrated areas of poverty. An analysis shows that 3,095 of SLHA's vouchers are located in the County and 3,330 are located in the City. Of these vouchers, 1,593 or 24.79% are located in a racially and ethnically concentrated area of poverty. The concentration in the County is very low, with only 182 or 5.88% located in racially and ethnically concentrated areas of poverty. In the City, 1,411 vouchers or 42.73% are located in racially and ethnically concentrated areas of poverty.

The data shows that SLHA’s agreement with the County is effective in reducing racially and ethnically concentrated areas of poverty.

However, SLHA’s ability to continue its deconcentration efforts is severely impacted by mandatory budget cuts. To allow families the maximum mobility, SLHA has for many years adopted the highest allowable payment standard. Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits a family’s choice in housing, often forcing families to older, less desirable areas with less costly housing. These are areas more likely to be racially and ethnically concentrated areas of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower HCV payment levels in place to continue serving as many tenants as possible, leaving families fewer choices, but with some housing assistance rather than none.

3. Housing Needs Across Protected Classes

The City’s AI includes an Affordable Housing Needs table that analyzes income and rental data to determine the need for housing. The table reflects a great need for housing for the poorest residents and an over-supply of housing at the upper end of the cost spectrum.

Income	Households	Monthly Housing Costs	Number of Units	Net
Less than \$10,000	21,028	Less than \$300	12,016	-9,012
\$10,000 - 14,999	12,445	\$300 - 399	10,585	-1,860
\$15,000 - 24,999	20,885	\$400 - 599	29,038	8,154
\$25,000 - 34,999	18,310	\$600 - 799	27,608	9,298

The AI goes on to state that there are 37,103 extremely low-income households, with incomes at or below 30% of the area median income, in the City of St. Louis. More than 70% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden. The majority of these households are paying more than 30% of their household income for housing.

The AI identifies that there are 24,288 low-income households, with incomes between 30% and 50% of the area median income, in the City of St. Louis. About half of low-income households have some sort of housing problem. Almost 44% of

these households are paying more than 30% of their household income for housing and almost 11% are paying more than 50% of their household income for housing. The AI also states that there are 30,686 moderate-income households, with incomes between 50% and 80% of the area median income, in the City of St. Louis. Approximately 16% of these households are paying more than 30% of their household income for housing.

As the demographic information for the area shows, African-Americans and American Indians have a much higher percentage of the population living with very low incomes than other racial/ethnic groups. Therefore, the need is greatest among the African American and American Indian protected classes.

The AI for the City of St. Louis indicates that there is also a need for units with accessible features for persons with disabilities for the elderly and a smaller need for large families. SLHA's data indicates that the need for elderly housing is not as strong as the AI indicates because SLHA does not see the demand for elderly housing.

SLHA has four developments that are designated elderly only. While each has a waiting list, the lists are relatively short and always remain open. All of SLHA's other waiting lists are extremely long and most are closed. When they open, they generally open for very short periods of time and receive hundreds, sometimes thousands of applications. This leads SLHA to conclude that the need for elderly housing is being provided by the private market, limiting the demand on SLHA's units.

IV. Identify Any Impediments to Fair Housing Choice Within SLHA's Programs

As with the requirement for a PHA to examine its programs, there is very little HUD guidance on how a PHA is to identify the impediments to fair housing choice within its programs in order to satisfy the requirements of 24 CFR 903.7(o)(3)(ii). HUD's website states that PHAs may conduct their own AI or ensure their annual PHA Plans are consistent with the applicable jurisdiction's Consolidated Plan and AIs. As SLHA has extremely limited resources, it has chosen to use the AI performed by the City of St. Louis. As stated above, the City's AI was completed in March 2012, but is yet to be approved by HUD. The impediments to fair housing choice identified in the City's draft AI are as follows:

1. There are not enough rent-assisted units to meet the demand.
2. Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.
3. The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

4. Information about fair housing enforcement is not universally known to organizations working with people in protected classes.
5. Continuing uncertainty regarding the General Assembly's commitment to funding tax credit programs used to fund low-income housing construction and rehabilitation is leading to uncertainty in the public and private sectors about the future availability of these resources in the production of affordable housing.
6. There is a lack of a centralized method for distributing Community Development Block Grant (CDBG) funds to meet housing needs.
7. Occupancy permit requirements are unevenly applied across the City of St. Louis.
8. Real Estate Agents do not provide enough information about the amenities of the City of St. Louis to customers who want information about where to locate.
9. There has been a constriction in access to credit for low-income and minority borrowers.
10. Accessible housing units are not often available to people with disabilities.

Clearly, some of the impediments identified in the City's AI do not relate to SLHA programs. SLHA is not responsible for administration of the LIHTC program. Therefore, SLHA has little ability to impact Impediment 4. SLHA is not involved in the City's administration of the Community Development Block Grant (CDBG). Therefore, Impediment 6, which identifies the method of distribution of CDBG funds, is not relevant to SLHA. SLHA is not a real estate agent or a lender. Therefore, Impediments 8 and 9, which identify issues with information provided by real estate agents and issues with the availability of credit to low-income and minority buyers, are not relevant to SLHA. Instead, Impediments 1, 2, 3, 5, 7 and 10 are the only Impediments relevant to SLHA.

V. Address Those Impediments in a Reasonable Fashion in View of the Resources Available

To address the impediments in a reasonable fashion, each relevant impediment is addressed separately.

1. Impediment 1

Impediment: There are not enough rent-assisted units to meet the demand.

Impact: Many low-income residents have less access to quality housing.

Analysis: The analysis in the City's Draft AI states that there are 78,148 renter households in the City, 37% of which are cost burdened and 20% of which are severely cost burdened. When looking at extremely low-income, low-income, and

moderate income households, the situation is more dire. Approximately 73% of extremely low-income households, 49% of low-income households, and 22% of moderate-income households have one or more housing problems. The primary housing problem in each group is cost burden.

As of March 31, 2013, SLHA was assisting about 9,371 households, with over 15,000 families on the waiting list for public housing and for Housing Choice Vouchers (HCV). In September of 2000, SLHA was assisting 7,150 households. In the past 12 years, SLHA has increased the number of households served by 31% or over 2,200 households. According to the City's AI, even with this level of assistance, there are still approximately 20,000 households in need of such assistance that do not receive it.

SLHA's Agency Plan recognizes the need for more affordable housing. One of the SLHA goals is to increase the supply of affordable housing by building an additional 120 public housing units and obtaining an additional 250 Housing Choice Vouchers. However, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from reaching its goal. The effects of sequestration have been particularly devastating to the HCV program. Because of the budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program. While SLHA will make every effort to increase the supply of affordable housing, lack of funding from HUD may prevent SLHA from serving additional households.

2. Impediment 2

Impediment: Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

Impact: Resident resistance may influence policy makers who might otherwise support housing development for protected classes. Resistant resident successes may lead to a perceived sanctioning of residents who have negative attitudes toward protected classes and perpetuates an unwelcoming environment

Analysis: As the City's AI states, NIMBY is an acronym standing for Not In My Back Yard. NIMBYism, as it is known, is the opposition of residents to developments in their neighborhood that putatively cause crime, lower property values, or generally have a negative effect. The name derives from the fact that many NIMBYs do not necessarily object to the proposed development; they object to its location near their home (i.e., "not in their backyard"). NIMBYism is often used in the context of dangerous or unwanted land uses, such as environmental hazards, in addition to social concerns, such as low income or transitional housing. It is commonly referred to as a problem in public policy and development circles due to the fact that NIMBYs

are often opposed to such land uses on principle without considering any facts or additional information about the development in question.

The City's AI goes on to state that in order to find the most affordable developable parcels and encounter the least NIMBY-related resistance in the community, developers often locate affordable housing projects in areas that are severely impacted with respect to poverty. The AI goes on to recommend that potential NIMBYism issues should be addressed in the planning process of a development. The AI concludes that negative attitudes regarding affordable housing should be addressed with better information about successful housing initiatives and by including the residents in planning for affordable housing initiatives, which would include their input and concerns and provide a means to get quality information to the neighbors before rumors and innuendos can overcome a development.

SLHA's Agency Plan includes a goal to increase awareness and understanding of programs, services and successes. As part of this strategic goal, SLHA has an objective to develop a community education program. The purpose of the community education program is to provide information to the SLHA clients, vendors, stakeholders and the general public about successful SLHA housing initiatives and to break down negative stereotypes about subsidized housing. In addition, in all new developments, SLHA requires the developer to engage the community and obtain community input in the planning process.

3. Impediment 3

Impediment: The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

Impact: Steady employment is difficult to find and maintain for protected class members with few resources. It is difficult for families in protected classes to find affordable housing and obtain quality education for their children.

Analysis: The City's AI states that most of the current development of low-income housing is developed by private developers with LIHTC financing and with partial financing through the Affordable Housing Commission or the Community Development Agency. Since private developers initiate the process, site selection is more about ease of obtaining the land at a cost that the project can support and avoiding problems with the neighborhood. Another factor that should be considered is that funding sources favor investment in distressed communities. Affordable housing developments provide jobs and stability in neighborhoods that would have little investment, if not for public investment. The AI states that this practice has led to the creation of an area that is defined by poverty.

The AI goes on to recommend that the City set goals to encourage developers to choose sites in less poverty impacted areas, increase regional planning to distribute

low-income housing to areas with good jobs and transportation, and encourage creative partnerships that will invest in low income areas of the City.

The AI concludes that large scale interventions, with guidelines for mix-income housing and universal design, may offer the best hope for revitalization for largely depleted neighborhoods with a high percentage of vacant land.

SLHA's Agency Plan goal for increasing the supply of affordable housing using the mixed-finance method of development is consistent with the recommendations in the AI. SLHA's strategy focuses on revitalizing entire neighborhoods using public and private resources as a catalyst to bring more redevelopment and economic opportunities to the areas. This creates the large scale intervention that the AI recommends.

SLHA, in partnership with the City and private developers, has completed developments using this revitalization strategy in four neighborhoods in the City. In all those neighborhoods, the strategy has resulted in substantial private investments and positive change in the economic composition of the area. For example, the revitalization of the Near South Side (formerly known as Darst-Webbe) has resulted in over \$100 million of private investment in the area. As a result of the revitalization, retail and commercial businesses have returned to an area that had seen many decades of disinvestment. The economic composition of the residents has changed, with a mix of public housing residents and market rate residents. Renaissance Place at Grand (formerly Blumeyer) has seen the same results, with private investments of over \$63 million and an increase in average income of 40%.

Unlike a purely private development, SLHA and its development partners very carefully consider the location of the developments, as they relate to jobs and transportation. Five of the six neighborhoods where revitalization is complete or underway are located near major employment centers. Two are immediately adjacent to downtown, with a third less than half a mile from downtown. Two others are located in mid-town, adjacent to the arts district, a major university and a large VA medical center, all potential sources of employment. All the developments are located on bus lines, giving the residents access to public transportation. In addition, there is a wide variety of social, recreational, educational and health care facilities located near each of the neighborhoods.

Consistent with the recommendations of the AI, SLHA has used a variety of very creative partnerships to bring investment to low-income areas. SLHA and its development partners used New Market Tax Credits and Empowerment Zone funds to build a new office building for SLHA, which contains a bank and a coffee shop in the Renaissance Grand neighborhood. The group also used New Market Tax Credits and public housing community facilities funds to build a new early childhood education center that will serve the communities on the near north side of downtown. When complete, the facility will provide 156 children with a high level of early childhood education.

The AI also recommends increasing regional planning to disburse low-income housing. SLHA's jurisdiction for new development of affordable housing includes only the City of St. Louis. While SLHA agrees that there should be increased regional planning, SLHA cannot build affordable housing outside its jurisdiction. However, SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of housing areas. For many years, SLHA adopted the highest allowable payment standard to facilitate the broadest range of housing choice possible.

Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits families' choices in housing, often forcing families to older, less desirable areas. These are the areas that are most likely to have a concentration of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower levels in place, leaving families with fewer choices. In a choice between continuing to provide assistance to current participants or providing families the maximum amount of choice in housing areas, SLHA opted for providing assistance to current participants. If the program is ever fully funded, SLHA will have to determine if it wants to assist more families or give current participants more choices.

The AI claims that the location of the majority of the low-income housing prevents residents from obtaining quality education for their children. It should also be noted that while the public schools in the City of St. Louis are generally low performing, there is a variety of educational choices for children to attend better schools. All students in the City have the option of applying to attend a magnet or charter school. These schools generally perform at a higher level than the traditional public schools. In addition, the children have the option of participating in the Voluntary Inter-district Choice program. This program will allow children to attend schools in the Parkway, Rockwood or Clayton school district. These school districts are all much higher performing districts than the City of St. Louis. These educational choices give residents access to educational facilities that are at least equivalent to the choices in non-impacted areas.

4. Impediment 4

Impediment: Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

Impact: Fair Housing complaints may be under-reported.

Analysis: Information about fair housing enforcement is well known to SLHA. Through both its HCV Administrative Plan and public housing ACOP, SLHA makes every attempt to provide its stakeholders with the necessary information about fair housing enforcement.

The HCV Administrative Plan requires SLHA to take steps to ensure that families and owners are aware of applicable equal opportunity laws. As part of every family's oral briefing process, SLHA reviews information with HCV applicant families about equal opportunity requirements and the opportunity to rent in a broad range of neighborhoods. All applicable Fair Housing information and discrimination complaint forms are part of the voucher holder's briefing packet and available upon request. The owners' briefing includes information regarding Fair Housing requirements. In addition, the Housing Assistance Payments (HAP) contract, which all owners must sign to participate in the program, contains provisions that prohibit the owner from discriminating against any person because of race, color, religion, sex, national origin, age, familial status, sexual orientation, gender identity or disability.

SLHA's ACOP requires SLHA to take steps to inform public housing residents of all applicable civil rights laws. As part of the public housing orientation process, SLHA will provide information to public housing applicants about civil rights requirements. The ACOP further provides that if an applicant or resident advises SLHA that they believe that any family member has been discriminated against, SLHA will provide a copy of a discrimination complaint form to the complainant and provide the family with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

SLHA provides training, coordinated through HUD's Office of Fair Housing and Equal Opportunity (FHEO), to the HCV staff and the management agents' staff at least annually. The purpose of the training is to make sure the staff is aware of their obligations complying with fair housing requirements.

5. Impediment 7

Impediment: Occupancy permit requirements are unevenly applied across the City of St. Louis.

Impact: Tenants are renting properties that lack occupancy permits.

Analysis: The City's AI states that occupancy permits are one way that a municipality can protect the residents. They help control the quality of housing and limit overcrowding. Another benefit to occupancy permits is that tenants gain some leverage to have residences brought up to code and made safer before occupying these dwellings. The AI goes on to state that occupancy permits have a positive impact on fair housing.

While SLHA does not have the authority to issue occupancy permits, both the HCV and public housing programs have initial and annual inspection requirements and both programs have strict occupancy standards to prevent overcrowding. The annual inspection requirements review property quality much more often than an occupancy permit, which only requires an inspection at initial occupancy. SLHA inspection and occupancy standards remove this impediment to fair housing for participants in SLHA programs.

6. Impediment 10

Impediment: Accessible housing units are not often available to people with disabilities.

Impact: Persons with disabilities needing accessible housing do not have free and equal access to housing.

Analysis: The City's AI states that there is a great need for accessible housing in the City of St. Louis. An estimated 14% of the population has a disability and 7.2% has an ambulatory disability. When looking at just the senior population of the City, approximately 44% have a disability and 30% have an ambulatory disability. This is a large population of residents who have a disability when compared to St. Louis County, where 9% of the population are residents with disabilities.

SLHA fully complies with the requirements of Section 504 and has more than the required number of accessible units. Of SLHA's current inventory of 2,852 units, 7.89% of the units are accessible for individuals with mobility impairment and 3.23% of the units are accessible for individuals with hearing and visual impairments. A list of SLHA's current units is provided in Appendix B.

In addition, the inventory includes four developments designed for elderly families. These developments were all designed using the principles of universal design. Some of the universal design features that are included are: adequate clearances in front of each appliance and working surfaces, faucets with single lever handles and shallow bowls, slip resistant smooth surface flooring and low pile carpet, lever door handles instead of door knobs, adjustable height closet rods, view windows with 36" or less sill height, mirror to backsplash behind bathroom sink, mixer valve with pressure balance and hot water limiter, electrical outlets, light switches and thermostats at accessible heights.

All ground floor units and elevator units are adaptable designed. This design includes: accessible building entrance on an accessible route, accessible common and public use area, usable doors, accessible route into and through a unit, accessible environmental controls, reinforced bathroom walls for grab bars and usable kitchens and bathrooms.

In addition, to the extent practical all entry doors and interior corridors are no less than 3'-0" wide and all interior doors are no less than 2'-10" wide, allowing 32" of clear passage space.

The more recent family developments at Arlington Grove and North Sarah also are designed using universal design principles, as well as meeting all the requirements of Section 504 and the Fair Housing Act. SLHA exceeds its requirements for accessible units and houses a large number of disabled families. The developments proposed in SLHA's Agency Plan will add to the supply of accessible units. In addition, SLHA's Agency Plan commits to applying for Non-Elderly Disabled ("NED") vouchers from HUD, if funding is available and it can identify a viable community partner.

Unfortunately, as with SLHA's goal to increase the supply of affordable housing, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from being able to increase the supply of additional accessible units. If the 2014 appropriation levels remain at 2013 levels, there will likely not be funds available for NED vouchers or additional public housing units.

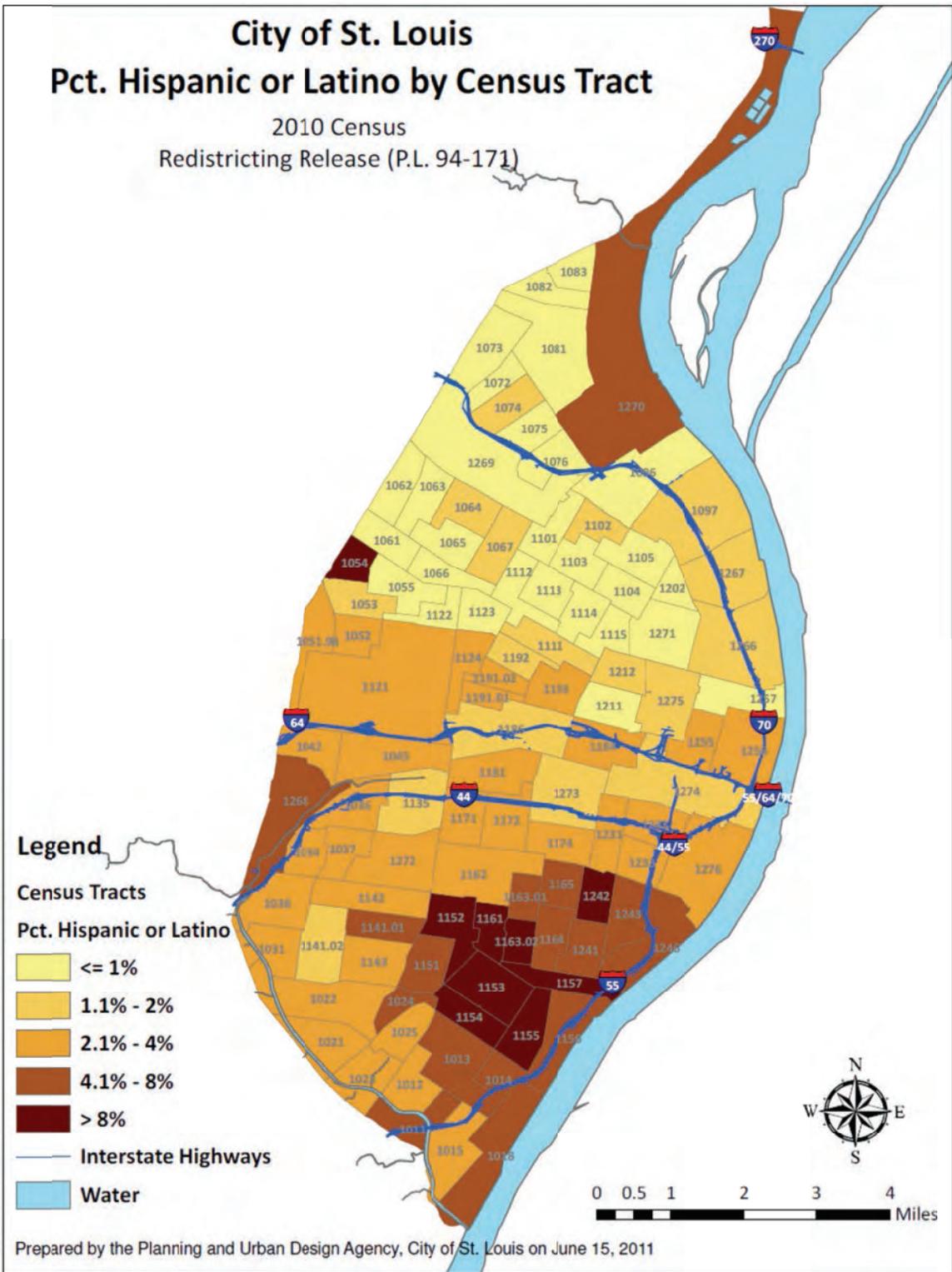
VI. Work with Local Jurisdictions to Implement Any of the Jurisdiction's Initiatives to Affirmatively Further Fair Housing that Require PHA Involvement

SLHA works closely with the various City development agencies, including the Community Development Agency, the Planning and Urban Design Agency, the St. Louis Development Corporation and the Affordable Housing Trust. SLHA participates in the City's Consolidated Plan process and the City verifies that SLHA's Agency Plan is consistent with the Consolidated Plan. The Planning and Urban Design Agency and the City's Department of Human Services were members of the SLHA Strategic Planning Committee that defined the goals and objectives presented in the Agency Plan. While the City's AI does not identify any jurisdictional initiatives that specifically require SLHA's involvement, as identified with each impediment discussed in Section V of this document, SLHA's Agency Plan and policies contain actions that will assist in reducing some of the impediments and affirmatively furthering fair housing.

VII. Maintain Records Reflecting These Analyses and Actions

This document will serve as the record of SLHA's completion of the analysis requirements of 24 CFR §903.7 (o). As a further record of its actions, SLHA will update the goals and objectives in the annual Agency Plan to document the progress on achieving the stated goals.

APPENDIX H



Note: Hispanic/Latino Origin is considered an ethnicity, not a race, by the Census Bureau. Hispanics/Latinos can be of any race

City of St. Louis Pct. Asian Alone by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)

Legend

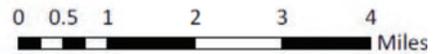
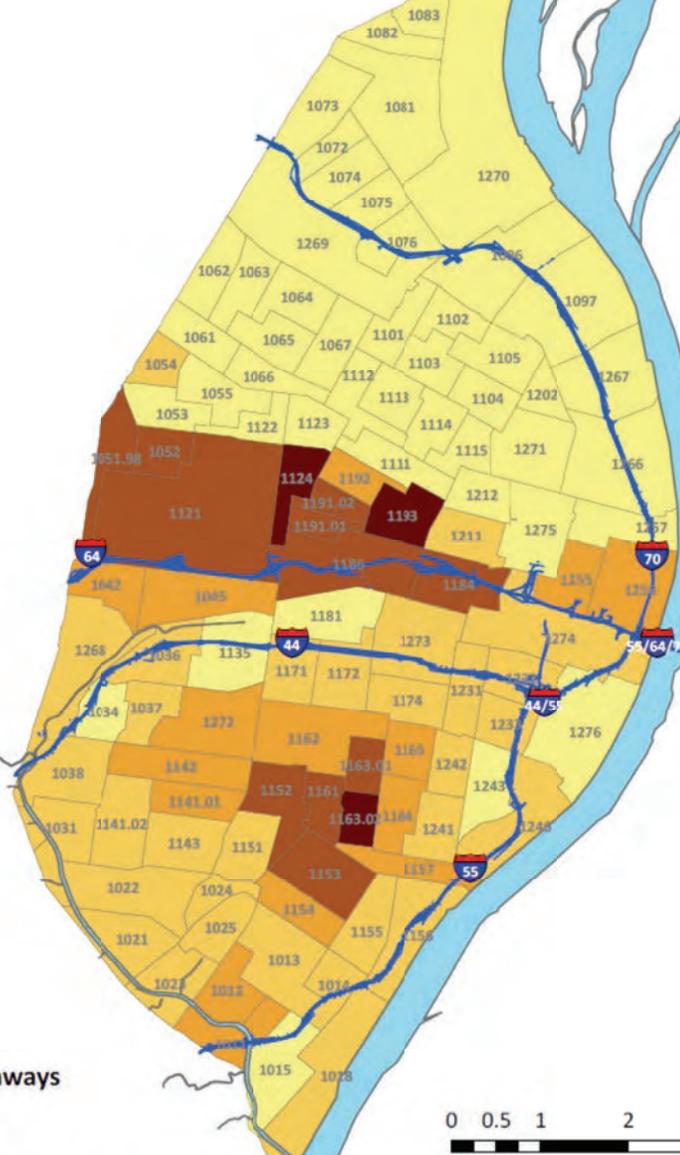
Census Tracts

Pct. Asian

-  0% - 1%
-  1.1% - 3%
-  3.1% - 6%
-  6.1% - 12%
-  > 12%

 Interstate Highways

 Water



Prepared by the Planning and Urban Design Agency, City of St. Louis on June 15, 2011

City of St. Louis Pct. American Indian or Alaska Native Alone by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)

Legend

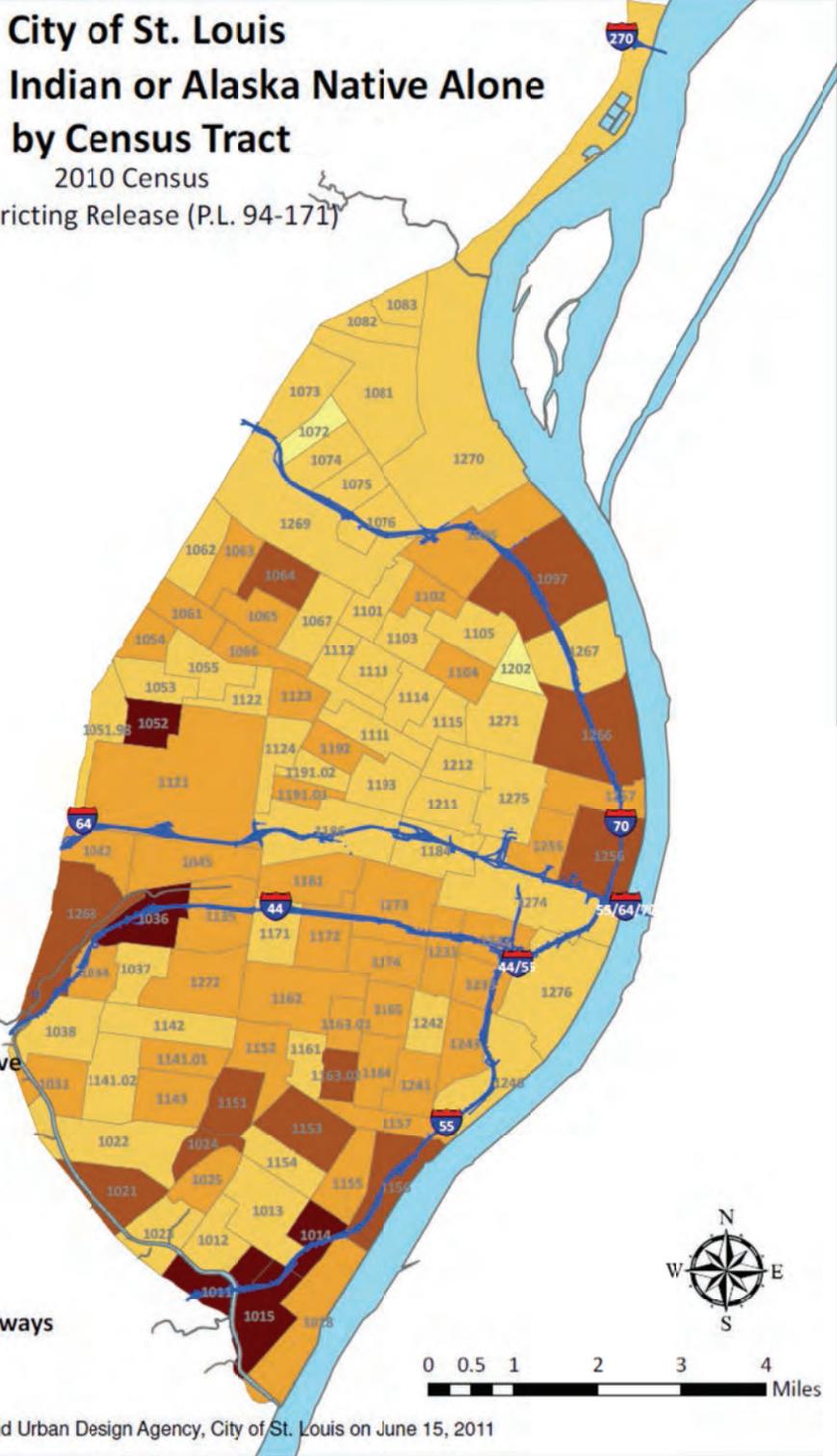
Census Tracts

Pct. Am. Ind./AK Native

-  0%
-  0.1% - 0.2%
-  0.21% - 0.4%
-  0.41% - 0.6%
-  > 0.6%

 Interstate Highways

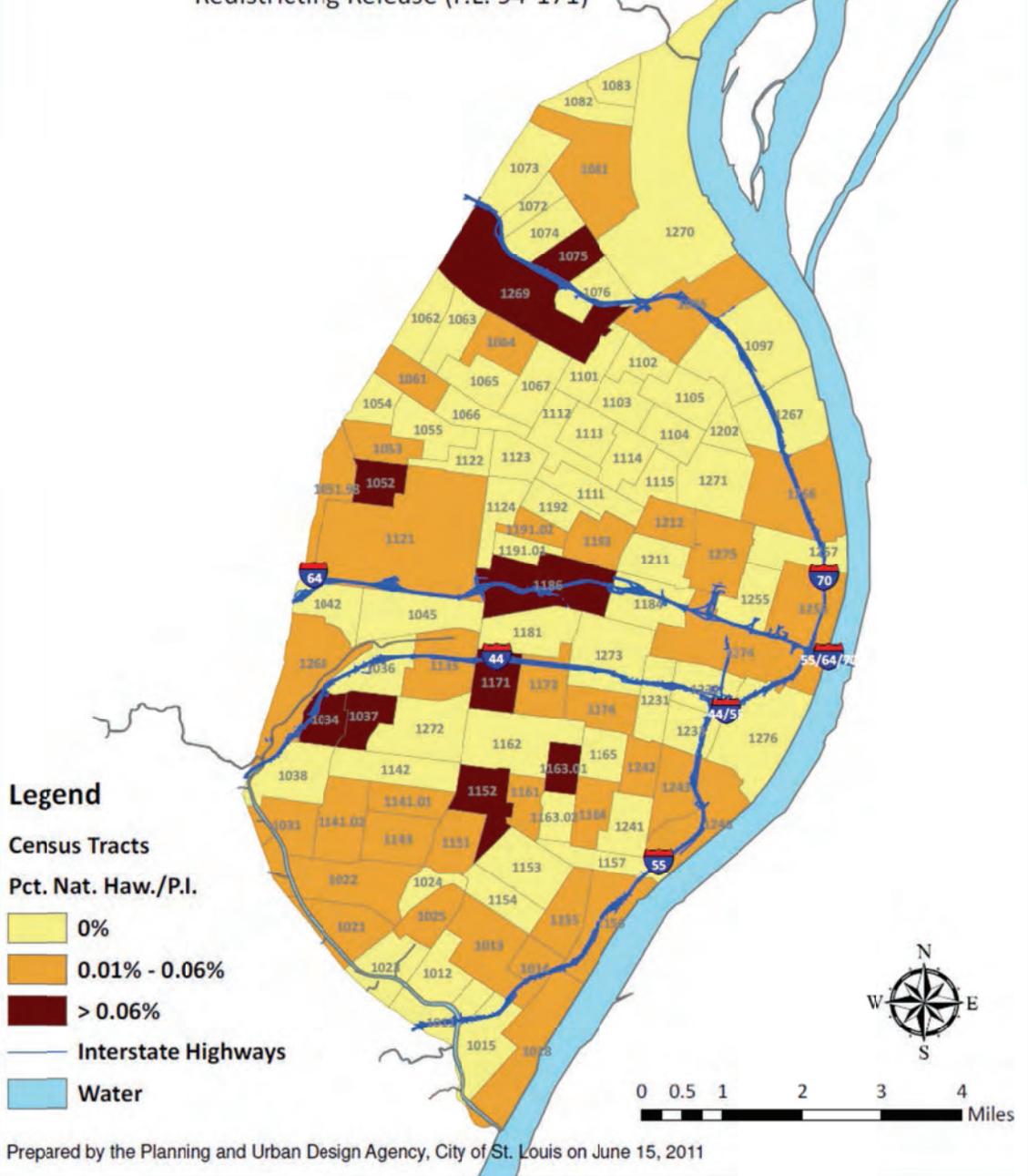
 Water



Prepared by the Planning and Urban Design Agency, City of St. Louis on June 15, 2011

City of St. Louis Native Hawaiian and Other Pacific Islander Alone by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)



City of St. Louis Pct. Two or More Races by Census Tract

2010 Census
Redistricting Release (P.L. 94-171)

Legend

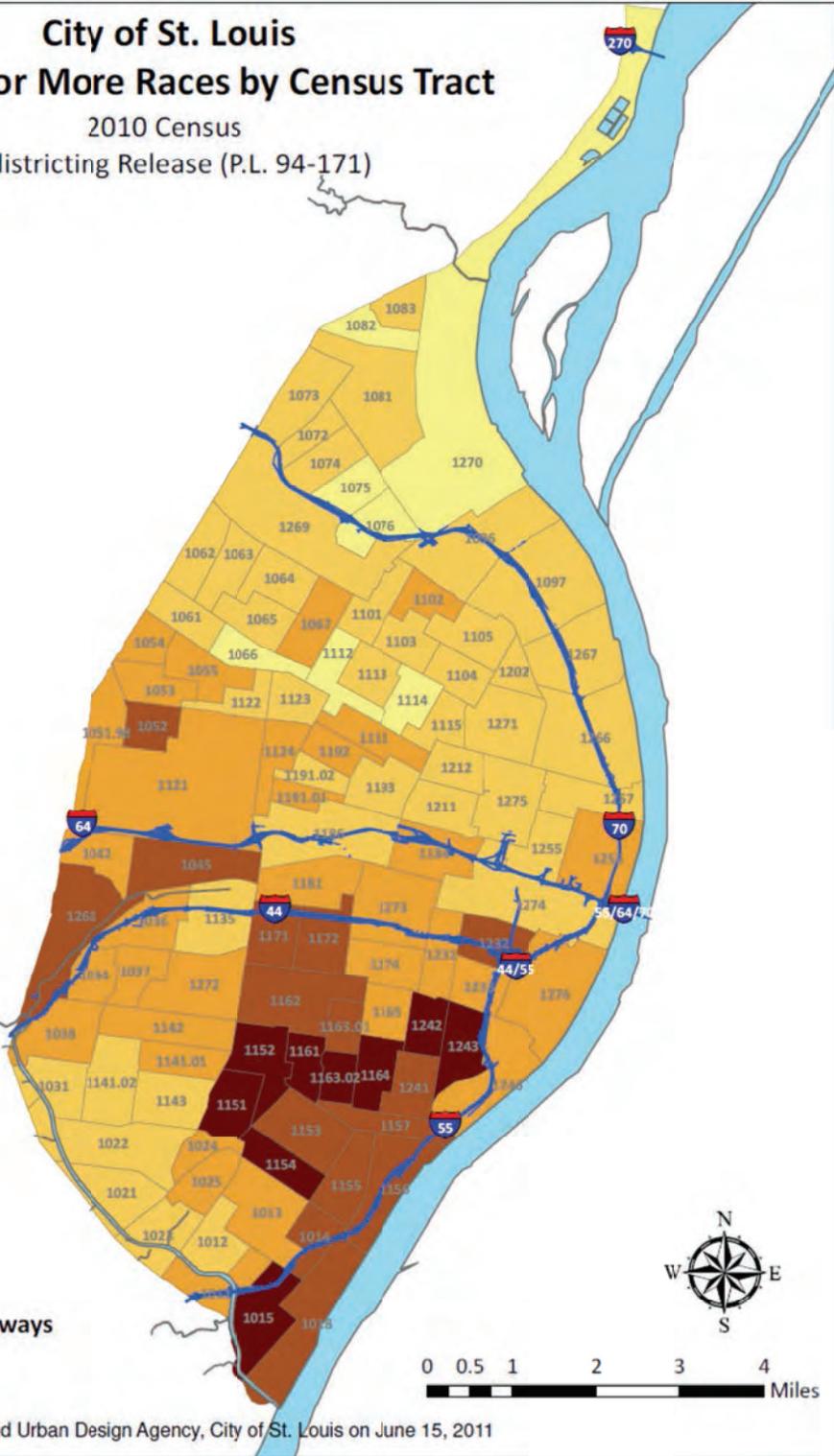
Census Tracts

Pct. 2 or More Races

-  <= 1%
-  1.1% - 2%
-  2.1% - 3%
-  3.1% - 4%
-  > 4%

 Interstate Highways

 Water



Prepared by the Planning and Urban Design Agency, City of St. Louis on June 15, 2011

APPENDIX I

Summary of Public Comments

Analysis of Impediments to Fair Housing Choice Public Feedback

January 9, 2015

Public Notice of Comment Period and Public Hearing Date

The draft Analysis of Impediments was available for review and public comment on December 11, 2014. Public notice of the comment period and public hearing date included the following:

- placing an ad in the St. Louis American on December 11, 2014 and the St. Louis Post-Dispatch on December 12, 2014;
- delivering a copy of the draft document to the Central Branch of the St. Louis Public Library, located at 1301 Olive Street;
- placing the notice and draft document on the City of St. Louis website at <https://www.stlouis-mo.gov/government/departments/community-development/draft-analysis-of-impediments.cfm>; and
- emailing the notice and link to the draft AI to a distribution list of over 200 stakeholders, including but not limited to local community development corporations, social service organizations, local Fair Housing organizations, and elected officials.

Public Hearing

On January 5, 2015, the Community Development Administration, in conjunction with its consulting team consisting of H3 Studio and Rise Community Development (collectively, the “project team”), held a public hearing on the draft Analysis of Impediments. The public hearing was structured to first provide a background on the regulatory requirements and information on the City’s existing conditions, draft impediments and proposed action items. To facilitate an open dialogue and to foster citizen input, during the last part of the hearing the project team solicited feedback from meeting attendees on four (4) of the Actions contained within the draft Analysis of Impediments documents. The feedback obtained is detailed in the Public Feedback Summary below.

Public Feedback Summary: Public Hearing

The following is a focused summary of public feedback to the draft Analysis of Impediments by common topic areas. Also included are the responses to the comments including whether/how the comments resulted in changes to the report.¹

Public Feedback on NIMBYISM Impediment

¹ Please note that in addition to changes resulting directly from public comments, revisions to the AI were made by the project team to further clarify the report based on feedback and questions concerning the draft.

Comment	Response
Develop and implement a public education program and public outreach campaign to combat NIMBYism	Incorporated into final Analysis of Impediments.
Work with the Neighborhood Stabilization program and Neighborhood Stabilization Officers of the City of St. Louis to abate nuisance properties will improve the perception of low-income properties in neighborhoods	Partnership with Neighborhood Stabilization Officers incorporated into final Analysis of Impediments, with the caveat that nuisance properties and properties with low-income residents are not synonymous.
Take an "asset focus" approach to affordable housing; work with CDCs to connect affordable housing residents to services and opportunities within local communities	Incorporated into final Analysis of Impediments.
Encourage proactive, public input and planning on where affordable housing is located in neighborhoods and where residents want to see affordable housing; ensure that affordable housing is planned for in a long-term, public way	Incorporated into final Analysis of Impediments.
Clearly define what citizen engagement is and what it isn't; what things are open to input and what things are not.	Incorporated into final Analysis of Impediments.
Support is expressed for "Develop materials explaining the benefits that affordable housing can provide to communities"	Incorporated into final Analysis of Impediments.
Proactively use social media and existing community networks to make information available to the public; don't just post things on the web and expect people to seek them out	Incorporated into final Analysis of Impediments.

Public Feedback on Recommendations for City of St. Louis Prioritization of Low Income Housing Tax Credit Projects

(Note: The purpose of soliciting feedback on this action is to identify priority needs for housing in the City of St. Louis and ensure that the evaluation and ranking of proposed low-income housing tax credit (LIHTC) projects reflects those priorities. The City of St. Louis acknowledges, however, that LIHTC is a state program administered by the Missouri Housing Development Commission (MHDC), and that the administration of the LIHTC program, as well as decision on which projects will be awarded tax credits, rests solely with the MHDC and is not under the jurisdiction of the City of St. Louis.

Comment	Response
Require developers of LIHTC projects to disclose political donations and if a project has a non-profit sponsor	Donations to elected officials are already disclosed and searchable on the Missouri Ethics Commission website, http://mec.mo.gov/ . Non-profit sponsors are also typically already disclosed.
Make LIHTC data more accessible to the public (budget caps, etc.)	The Analysis of Impediments recommendation concerning Low Income Housing Tax Credit (LIHTC) Projects looks at the ways the City of St. Louis prioritizes and evaluates these projects in order to make recommendations to the Missouri Housing Development Commission (MHDC) for projects that would best affirmatively further fair housing. However, the ultimate decision making power surrounding which projects are funded, as well the as rules and regulations concerning the LIHTC program, are the purview of MHDC.
Prioritize home ownership options for LIHTC projects after the 15-year tax credit compliance period	Incorporated into final Analysis of Impediments, with the caveat that AI recommendations refer to potential City of St. Louis priorities and that the clarification of these priorities is an action item to be completed under this Analysis of Impediments. Additionally, the ultimate decision making power surrounding which projects are funded, as well the as rules and regulations concerning the LIHTC program, are the purview of MHDC.
Prioritize 3-, 4-, and 5-bedroom units; help to ensure that availability of large units is more consistent throughout the City of St. Louis	Incorporated into final Analysis of Impediments, with the caveat that AI recommendations refer to potential City of St. Louis priorities and that the clarification of these priorities is an action item to be completed under this Analysis of Impediments. Additionally, the ultimate decision making power surrounding which projects are funded, as well the as rules and regulations concerning the LIHTC program, are the purview of MHDC.
Clarify the role of the Mayor's recommendations for LIHTC projects to MHDC	An explanation of the current recommendation process and the fact that the ultimate decision making power rests with MHDC and not the Mayor's office incorporated into final Analysis of Impediments recommendations.

<p>Clarify "access to transit"; institute a graduated ranking or prioritization for different types of transit (MetroLink vs. MetroBus; number of routes; headway; etc.)</p>	<p>Incorporated into final Analysis of Impediments, with the caveat that AI recommendations refer to potential City of St. Louis priorities and that the clarification of these priorities is an action item to be completed under this Analysis of Impediments. Additionally, the ultimate decision making power surrounding which projects are funded, as well the as rules and regulations concerning the LIHTC program, are the purview of MHDC.</p>
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Public Feedback on Tenant Rights Issues

<p>Comment</p>	<p>Response</p>
<p>Add other housing assistance organizations and other community organizations (CDCs, Nextdoor, Churches, Citizens Service Bureau) to "Provide written materials on tenants' rights to all renters through CREA (Civil Rights Enforcement Agency) and EHOC (Equal Housing Opportunity Council)"</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Provide information and resources on tenants' rights to the police department and sheriff's office (the offices responsible for conducting and enforcing evictions)</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Develop a program and/or materials for residents to provide tenants' rights information to other residents</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>This item should cover two (2) separate issues; 1) tenants' rights (i.e. landlord-tenant law); and 2) Fair Housing discrimination</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Consider adding an additional Action and/or activities to address Fair Housing discrimination issues</p>	<p>Incorporated into final Analysis of Impediments.</p>

Public Comments Summary: Formal and Written Comments

In addition to the comments from the public hearing, the Community Development Administration received two written comments. A summary the comment and the responses, including whether/how the comments resulted in changes to the report are detailed below.

Formal Comments from Dr. Molly Metzger

Comment	Response
Revise recommendation #9 to more accurately reflect the fact that the City of St. Louis already has Source of Income protection, and the issue needing clarification is whether or not this SOI protection extends to Section 8 renters.	Incorporated into final Analysis of Impediments.

Written Comments from the Civil Rights Enforcement Agency

Comment	Response
Page 16: There is no mention of the Bosnian population on this page. Not sure if they are included in the White/Non-Hispanic population, but this should be clarified as they are a large ethnicity in the city.	Incorporated into final Analysis of Impediments.
Page 26: CREA has not only reached out to SAGE, but to the Vital Voice, In the Lyfe, the LGBT Center, and Black Pride in order to let LGBTQ people know of their rights.	Incorporated into final Analysis of Impediments.
Page 59: While it is true that the City of St. Louis funds the Metro Equal Housing Opportunity Council, the City for many years, through general revenue, funds CREA. As to the number of cases, since 2009, CREA has received over 305 complaints about fair housing. We would certainly like to be included as an agency that provides resources in this area.	Incorporated into final Analysis of Impediments.
Page 63: It is certainly not true that CREA "relies on the Metropolitan Equal Housing Opportunity Council (sic) (EHOC) to manage fair housing issues." Again, we have fielded 305 fair housing complaints since 2009. I would like to see this passage withdrawn from the document for it is insulting and highly inaccurate.	Incorporated into final Analysis of Impediments.
Page 69: CREA over the past three years has increased our outreach to the LGBTQ and immigrant and refugee communities. We have done so through partnership grants from the U.S. Department of Housing and Urban	Incorporated into final Analysis of Impediments.

<p>Development. We have increased the amount of public speaking appearances, cooperative agreements with immigrant/refugee servicing social service agencies, extensive radio ads, written materials in a variety of languages, and the first Fair Housing Conference, which has an attendance of 199 persons, the largest of its kind in the region. It is certainly disappointing that none of this information is in the current AI.</p>	
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Written Comments from the Equal Housing and Opportunity Council

Comment	Response
<p>Clarify Gender Identity as a Protected Class. The draft AI does identify gender identity as a protected class in the City of St. Louis in the Introduction. However, it is not included in the Demographic Profile section on page 26 as part of the description of sexual orientation protections. EHOc recommends adding the term 'Gender Identity' to the title and in the first sentence in order to clarify it as a protected class.</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Identify Racial Disparities in Homeownership Rates. The section on Lending (page 46) includes a table with homeownership rates by household race, but there is no discussion identifying the significant disparities in homeownership rates between white and African American households. EHOc recommends adding additional information that identifies and discusses the disparities in homeownership rates between minority households and white households.</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Clarify Dates of Data. In some parts of the draft, it is not clear what year the data is from. Specifically, the Housing Need section does not identify the specific date of the Comprehensive Housing Affordability Strategy (CHAS) data used on pages 53 – 55. The Fair Housing Profile section includes data on fair housing complaints from EHOc but does not specify the end date for the data. Additionally, it would be helpful to clarify dates of analysis conducted by the AI researchers considering the document has been revised over the past three years. For example, the impediment about accessible housing describes a survey of Social Serve listings (page 71) but it is not clear if that survey was conducted in 2014 or in 2012.</p>	<p>Incorporated into final Analysis of Impediments.</p>

<p>Add Substantive Zoning Information. The section on zoning (page 60) does not have any substantive information or analysis about the zoning in the City of St. Louis. A brief paragraph simply mentions the zoning code and how the survey respondents and developers supported the zoning process. EHOC recommends adding substantive zoning and housing code information, including identification of accessibility standards in building codes.</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Identify Protected Class Disparities Related to Rental Assistance Impediment. The impediment of lack of rental assistance (on page 64) is an important issue. The draft AI identifies the key issue that many low-income residents have less access to quality housing. However, the discussion fails to identify this impact on protected classes under fair housing laws. Considering the disparities in income on the basis of race, national origin, and disability, we recommend including a discussion about how protected classes are particularly affected by the lower supply of affordable rental units.</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Distinguish Tenant's Rights Information and Fair Housing Information. The action step 6 (page 81) states that information about tenant's rights should be provided to all tenants in the City of St. Louis. While we support the efforts to increase information about tenant's rights under the Landlord Tenant law, we are concerned that there is no action step that specifically increases fair housing information and education. Fair housing rights apply much more broadly than tenants, as evidenced in information about lending and real estate agents discussed in the AI. Additionally, the AI identifies lack of fair housing knowledge as an impediment. Thus, EHOC recommends revisions to the action step that includes a strategy for increasing fair housing information as a separate strategy from tenant's rights information.</p>	<p>Incorporated into final Analysis of Impediments.</p>
<p>Allow for More Time to Consider Public Comments. We are concerned with the timing of the public comment period and finalizing the draft document. The public comment period ends on Friday, January 9 and yet the document is set to be finalized and submitted on that same date, according to information provided in the public hearing on Monday, January 5. We are concerned that any comments received on the draft document will not be adequately considered and included in the final version of the AI. In the future, EHOC recommends a public comment period with ample time for revisions prior to the final document</p>	<p>While this comment has not been formally incorporated into the Analysis of Impediments, as it relates to future public participation processes rather than the current AI recommendations, the comment has been noted by City of St. Louis staff. In addition, the City will ensure that all comments are adequately addressed prior to the issuance of the final Analysis of Impediments.</p>

deadline.	
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Community Development Administration

City of St. Louis

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