

Analysis of Impediments to Fair Housing Choice



Escambia Consortium

**Escambia County
Pensacola
Santa Rosa County**

June 2012

Table of Contents

- ❖ Introduction
- ❖ Consortium Profile
- ❖ Fair Housing Status
 - Fair Housing Research
 - Home Purchase Lending
 - Existing Programs and Citizen Participation
 - Fair Housing Complaints
- ❖ Identification of Impediments
 - Fair Housing Findings/Impediments
 - Recommended Actions
 - Summary Matrix
- ❖ Appendix
 - Signature Page
 - Fair Housing Complaints Received/Processed by HUD
 - News Release re: Santa Rosa County Fair Housing Week
 - Consolidated Plan Survey and Results
 - Human Relations Commission Survey
 - Housing Discrimination Poster (Military)
 - Comments from Legal Services of North Florida

Introduction

Introduction

The purpose of the *Analysis of Impediments to Fair Housing* is to review the housing choices in the jurisdiction to determine whether those choices are available to all. The Fair Housing Act specifies that housing occupancy shall not be affected by **race, color, religion, sex, familial status, disability, or national origin**.

The Escambia Consortium is preparing this Analysis in order to "affirmatively further fair housing" as required by three HUD programs in which it participates: the Community Development Block Grant Program, the HOME housing program, and the Emergency Shelter Grant Program. The funding for the Analysis came from the first two programs. The Escambia Consortium consists of Escambia County, the City of Pensacola, Santa Rosa County, and the City of Milton.

The Analysis includes a demographic profile of the entities' population and housing market, research to determine the current fair housing status in the consortium, an identification of impediments, and recommended actions to address/eliminate impediments. A schedule for the recommended actions is also included.

The Consortium prepared this Analysis with assistance from Florida Planning Group, Inc. Escambia County's Neighborhood Enterprise Foundation will continue to maintain records concerning fair housing activities, and will be responsible for carrying out the corrective actions and monitoring and evaluating their progress and effectiveness. Monitoring of the progress in carrying out the recommended actions will be incorporated into the County's CDBG program monitoring process.

Consortium Profile

Consortium Profile

Notes concerning the data: Population data included in this report is based primarily on the 2010 Census, the American Community Survey (U. S. Census Bureau), city-data.com, and data from the University of Florida's Shimberg Center for Housing Studies. None of the individual sources provides all of the various statistics necessary for a well-rounded analysis of population and housing. Since the sources have slightly different numbers for the total number of residents, there may be minor inconsistencies from one chart to another.

The Escambia Consortium is comprised of Escambia County including the City of Pensacola; Santa Rosa County including the City of Milton. The other incorporated area in Escambia County is the Town of Century, with an estimated 2010 population of 1,590. The other incorporated areas in Santa Rosa County are Gulf breeze, with a population of 5,743; and Jay, with a population of 536. These three incorporated areas are not a part of the Escambia Consortium. They comprise a total of 1.7 % of the total population of Escambia and Santa Rosa County and for purposes of this Analysis are considered statistically insignificant. Therefore, in describing the demographics of the Consortium, the total populations of Escambia and Santa Rosa will be included.

Population

The following chart shows the population projections from the Shimberg Center, with the actual 2010 population from the 2010 Census also shown. The growth rates of the two counties differ dramatically. The 2010 Census identifies Escambia's population at 297,619, an actual growth of 3.9%. Santa Rosa's actual 2010 population grew more than expected, to 151,372, an actual growth rate of 30.1% in just ten years.

Escambia Population Projection by Age for 1990-2020					
	Permanent Residents				
Age	1990	2000	2010	2015	2020
0-19	76,100	80,323	82,169	82,607	85,154
20-59	143,127	154,523	163,642	162,970	160,313
60-75	31,330	33,801	40,428	46,513	52,992
75+	11,761	17,812	23,620	26,069	29,603
Total	262,318	286,459	309,859	318,159	328,062
Actual			297,619		

Source: Shimberg Center, 2010 Census

Santa Rosa Population Projection for 1990-2020					
Age	1990	2000	2010	2015	2020
0-20	24326	34098	37710	39159	41991
20-59	45842	63857	77409	82735	85791
60-74	8477	13517	19204	23635	29209
75+	2751	4847	7780	9169	11211
Total	81396	116319	142103	154698	168202
Actual			151,372		

Source: Shimberg Center, 2010 Census

Income

Escambia County is not an affluent community. The 2006-2010 American Community Survey placed Escambia's median household income at \$43,573. Santa Rosa, however, has a much higher standard of living, with a median income of \$55,129. The median income information becomes even more interesting when reviewed by racial categories. There are interesting variations throughout the information, but of particular note is the lower median income and higher percent of poverty for black residents. This may be a reason for the lower homeownership rates identified later in this section. Another item of particular note is that the Hispanic population in Santa Rosa County is more affluent than the white population and the population as a whole.

Median Income in past 12 months				
	All	White	Black	Hispanic
Escambia	\$43,573	\$49,279	\$26,492	\$36,447
Santa Rosa	\$55,129	\$55,930	\$39,178	\$62,440

Source: American Community Survey
2006-2010

Percent of Population Living in Poverty - 2009				
	All Races	White	Black	Hispanic
Escambia	18.9%	11.8%	38.3%	Not Provided
Pensacola	15.5%	6.9%	35%	18.4%
Santa Rosa	11.1%	Not Provided	Not Provided	Not Provided
Florida	14.9%	Not Provided	Not Provided	Not Provided

City-data.com

Age

Both Counties have a younger age structure than Florida. According to the American Community Survey, in 2006-2008, Escambia's median age was 36.8 and Santa Rosa's was 37.7, versus 40.1 for Florida.

The population is steadily aging. While most other age segments of the population in Escambia are expected to stay at approximately the same level during the next twenty years, the senior population will increase dramatically. Santa Rosa's population in all segments is expected to increase, although the senior population growth will outpace the younger segments.

Escambia Projected Population by Age 2000-2030				
Age	2000	2010	2020	2030
0 -19	81,643	82,189	85,174	87,990
20 - 54	146,584	147,273	142,768	147,412
55 - 64	27,014	35,783	40,252	34,424
65 +	39,169	47,256	62,510	79,877

Source: Shimberg Center

Santa Rosa Projected Population by Age 2000-2030				
Age	2000	2010	2020	2030
0-19	34,111	37,739	42,024	46,914
20-54	58,954	70,576	76,865	85,203
55-64	11,706	18,392	24,414	23,124
65+	12,972	18,594	28,500	42,255

Source: Shimberg Center

Migration

The following charts from the American Community Survey 2005-2010, show similarity in the amount of movement in Escambia and Santa Rosa. In both counties, ninety percent of the population was in the same county the previous year.

RESIDENCE 1 YEAR AGO	Escambia County		
<i>Population 1 year and over</i>	293,940		293,940
Same house	231,159		78.6%
Different house in the U.S.	61,046		20.8%
Same county	33,583	11.4%	
Different county	27,463	9.3%	
Same state	8,407	2.9%	
Different state	19,056	6.5%	
Abroad	1,735		0.6%

RESIDENCE 1 YEAR AGO	Santa Rosa County		
<i>Population 1 year and over</i>	146,285		146,285
Same house	118,234		80.8%
Different house in the U.S.	27,279		18.6%
Same county	13,293	9.1%	
Different county	13,986	9.5%	
Same state	5,842	4%	
Different state	8,144	5.6%	
Abroad	772		0.5%

Race

The population of Escambia County is well-diversified with 68.9% white, 22.9% African-American, 4.7% Hispanic, and 2.7% Asian. Pensacola's population is also diversified, with a somewhat higher percentage (27.1%) of African-Americans. (Florida's overall African-American population is 17% according to the 2010 census.) Santa Rosa's population is much less diversified, with an 87.1% white population.

RACE - Escambia		
Total population	297,619	297,619
White	204,993	68.9%
Black or African American	68,282	22.9%
American Indian and Alaska Native	2,623	0.9%
Asian	8,174	2.7%
Asian Indian	594	0.2%
Chinese	711	0.2%
Filipino	3,485	1.2%
Japanese	380	0.1%
Korean	461	0.2%
Vietnamese	1,862	0.6%
Other Asian	681	0.2%
Native Hawaiian and Other Pacific Islander	430	0.1%
Some other race	3,740	1.3%
Two or more races:	9,377	3.2%
White and Black or African American	2,290	0.8%
White, American Indian, & Alaskan	2,088	0.7%
White and Asian	2,040	0.7%

Source: American Community Survey 2009

RACE - Pensacola		
Total Population:	52,903	52,903
White	34,891	66.0%
Black or African American	14,322	27.1%
American Indian and Alaska Native	303	0.6%
Asian	1,326	2.5%
Native Hawaiian/ Other Pacific Islander	134	0.3%
Some other race	319	0.6%
Two or more races:	1,608	3.0%

Source: 2006-2010 American Community Survey

RACE - Santa Rosa		
Total population	151,759	151,759
White	132,211	87.1%
Black or African American	6,788	4.5%
American Indian & Alaska Native	310	0.2%
Asian (no specifics provided)	3,384	2.2%
Native Hawaiian/Other Pacific Islander	535	0.4%
Some other race	1,981	1.3%
Two or more races	6,550	4.3%
White and Black or African American	1,956	1.3%
White and American Indian and Alaskan	1,770	1.2%
White and Asian	1,026	0.7%

Source: American Community Survey 2009

The Hispanic population in both counties is similar, less than 5%, although more of Santa Rosa's Hispanics came from Mexico. Clearly, the Hispanic population in both counties is much smaller than in other parts of Florida (22.5%), most likely due to the Counties' Panhandle location. The following information provides a detailed picture.

HISPANIC OR LATINO - Escambia		
Total population	297,619	297,619
Hispanic or Latino (of any race)	14,061	4.7%
Mexican	5,611	1.9%
Puerto Rican	3,033	1.0%
Cuban	1,036	0.3%
Other Hispanic or Latino	4,381	1.5%
Not Hispanic or Latino	283,558	95.3%

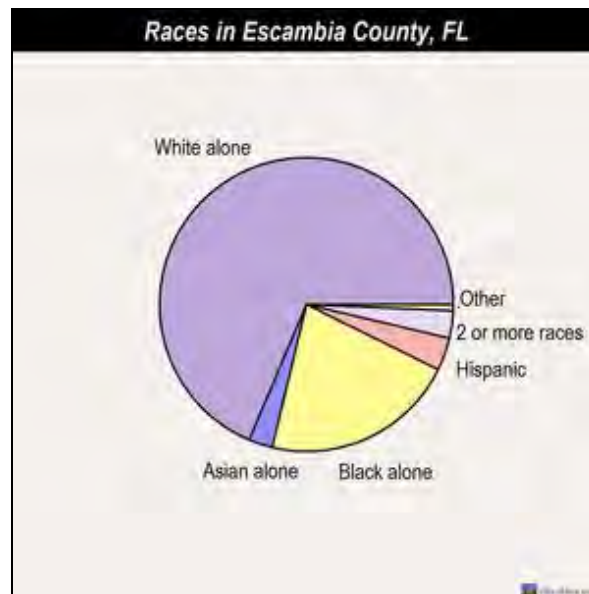
Source: American Community Survey 2009

HISPANIC OR LATINO - Santa Rosa		
Total population	151,759	151,759
Hispanic or Latino (of any race)	6,504	4.3%
Mexican	4,060	2.7%
Puerto Rican	417	0.3%
Cuban	688	0.5%
Other Hispanic or Latino	1,339	0.9%
Not Hispanic or Latino	145,255	95.7%

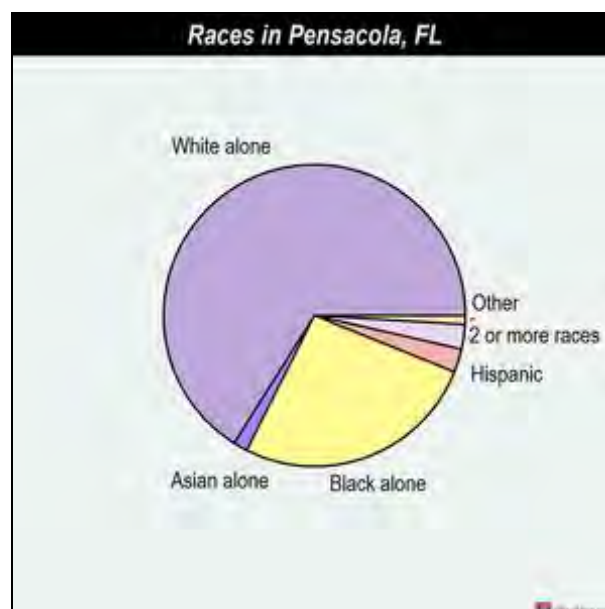
Source: American Community Survey 2009

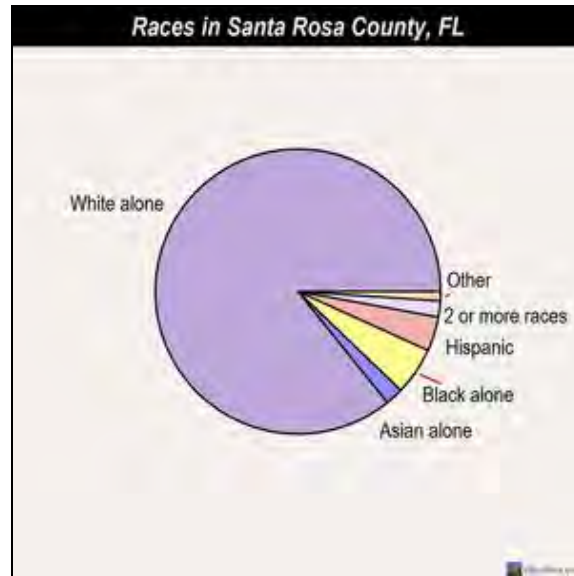
HISPANIC OR Latino - Pensacola		
Total Population	52,903	52,903
Hispanic or Latino	2,281	4.3%
Mexican	544	1.0%
Puerto Rican	645	1.2%
Cuban	542	1.0%
Other Hispanic or Latino:	1074	2.0%
Not Hispanic or Latino	50,622	95.7%

Source: American Community Survey
2006-2010



Source for all three Race charts: city-data.com





The Hispanic population, as well as the population of other national origins, requires consideration not only on their presence, but also on the possible language barriers that may exist. The following chart shows potential language barriers for the Consortium's Hispanic population, by showing that a large portion of the Hispanic population actually speaks Spanish in the home. Comparing the data from the 2000 Census with more current Census information, shows the proportionally significant increase in this population. Although this issue is far less significant than in other parts of Florida, it is a population that should be considered.

Percent of People 5 Years and Over Who Speak Spanish at Home					
County	2005-2009 ACS 5-year		Census 2000		Increase
	Estimate		Estimate		
Escambia County	3.4	%	2.8	%	21%
Santa Rosa County	3.3	%	2.5	%	32%
Florida (2006-2010 ACS)	19.6	%	Not Provided		

Source: 2005-2009 American Community Survey

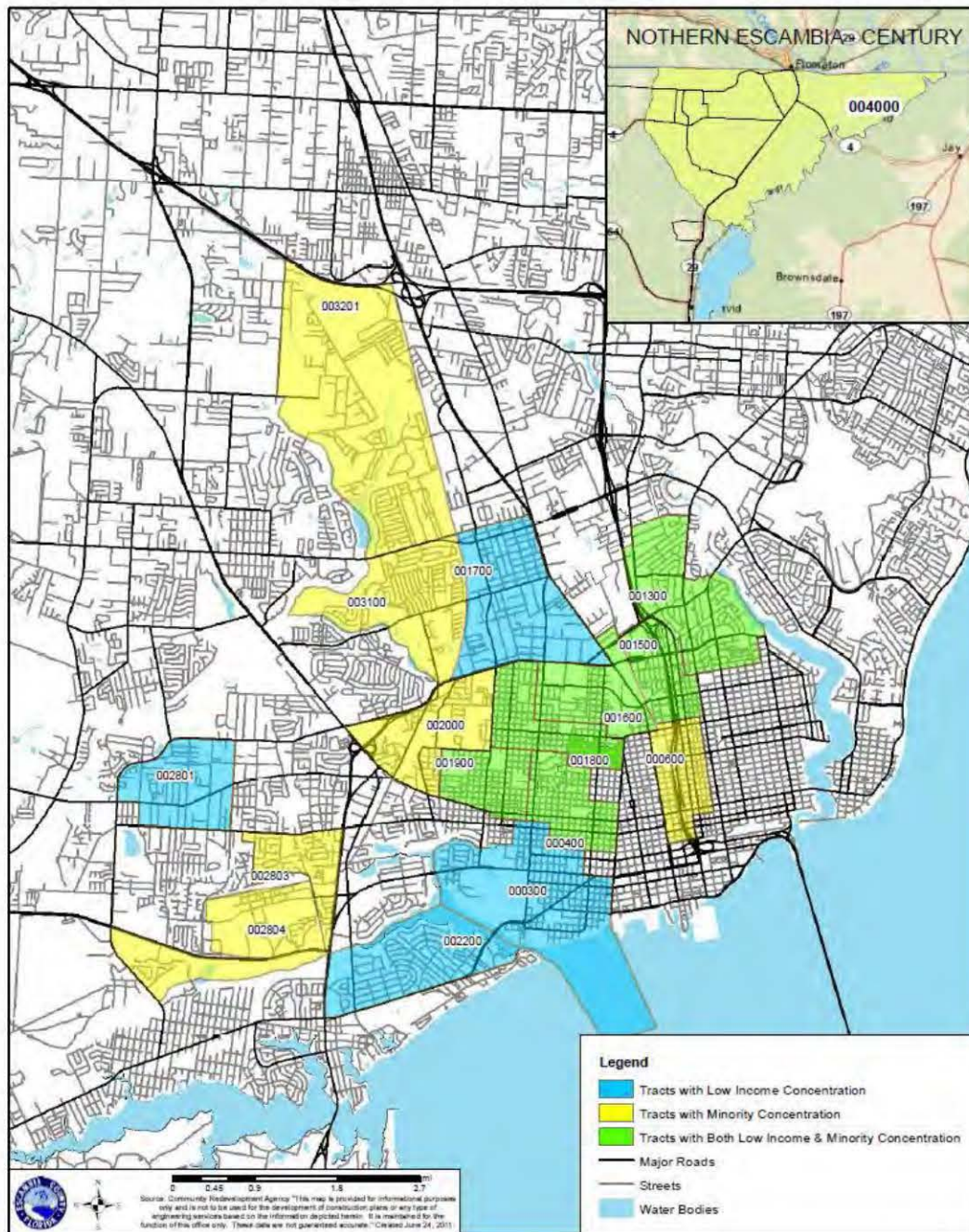
The following chart, based on Census 2000 numbers, shows the other primary languages in use in the two counties, and the percentage of residents who had self-identified as speaking English less than "very well." Note that the "less than very well " percentages are the percent of the previous line. For example, of the 1.8% of the population in Escambia that spoke Asian and Pacific Islander languages, 17 % of them believed that they did not speak English very well.

LANGUAGE SPOKEN AT HOME		
	Escambia	Santa Rosa
English only	93.2%	94.7%
Spanish	2.8%	2.5%
Speak English less than "very well"	15%	15%
Other Indo-European languages	2%	1.5%
Speak English less than "very well"	9%	7%
Asian and Pacific Islander languages	1.8%	1.2%
Speak English less than "very well"	17%	55
Other languages	.2%	.2%
Speak English less than "very well"	8%	6%

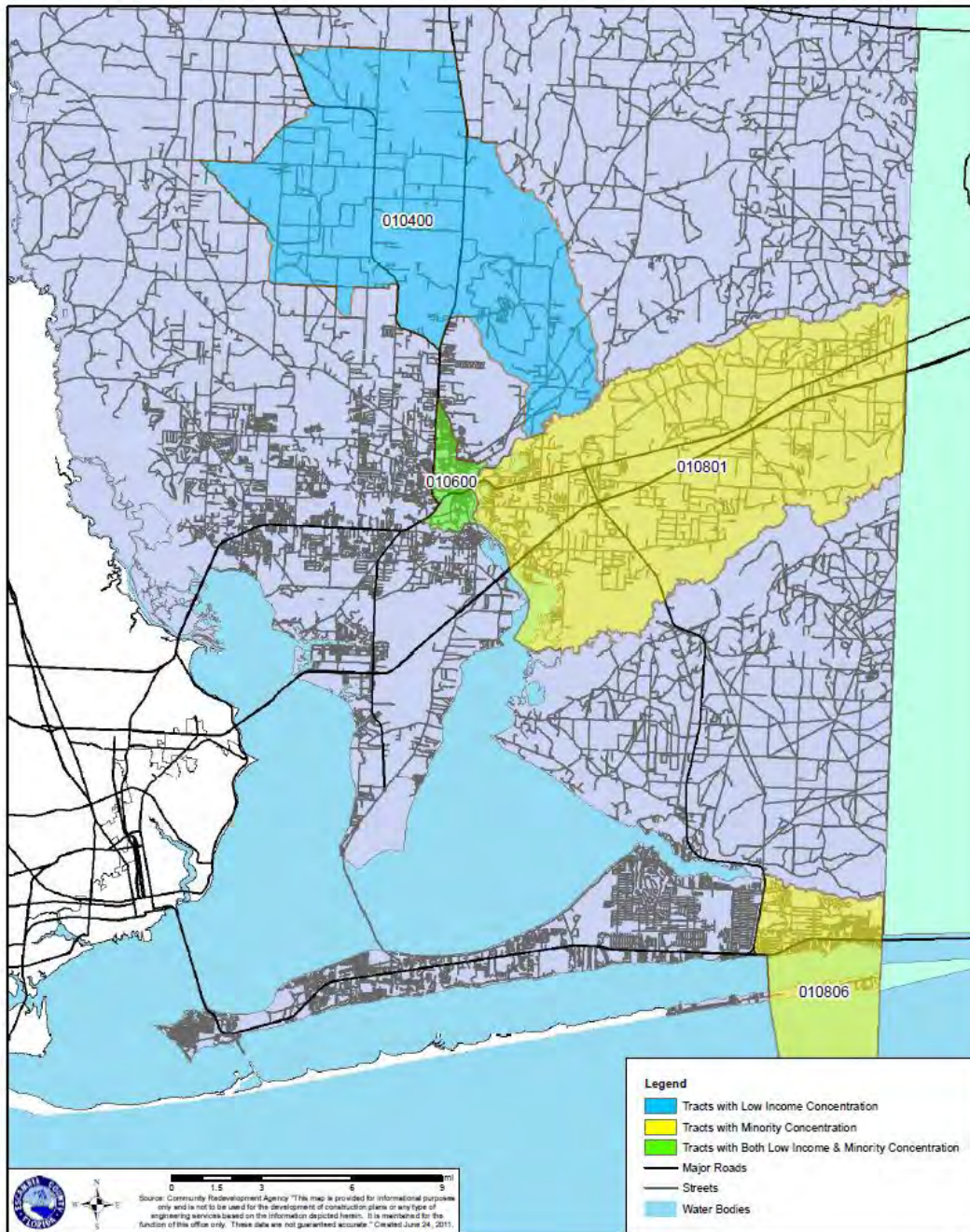
Source: City-data.com

The following maps display, for each county, the Census Tract concentrations of minority residents and also the concentrations of low-income residents. As both concentrations are shown on each map, the areas that are both minority and lower-income are readily apparent. Please note that the "minority" residents as shown on these maps include both African American and Hispanic residents.

ESCAMBIA/ PENSACOLA - Tracts with Minority Concentrations & Tracts with Low Income Concentrations



SANTA ROSA - Tracts with Minority Concentrations & Tracts with Low Income Concentrations



Housing

The 2000 Census found 124,647 housing units in Escambia County, and 49,119 in Santa Rosa County. Age, type, homeownership, and vacancy rates for the jurisdictions are shown in the charts contained in this section.

Reflecting its non-urban nature, 88.8% of Santa Rosa's housing stock was single-family detached (including manufactured homes). Escambia's housing stock contained more multi-family, no doubt due in some part to the City of Pensacola. Escambia's single-family detached housing (including manufactured housing) was 76.4% of its housing stock.

In comparison to state/national/regional housing costs, the Consortium has had relatively affordable housing. However, the values are continually changing, as the economic downturn, foreclosures and short sales have seriously affected housing values and sales throughout the U.S. and in the Consortium as well. The declines are shown on charts in this section.

Year Structure Built, 2000													
	Number								Share by Decade(%)				
	1999-March 2000	1995-1998	1990-1994	1980-1989	1970-1979	1960-1969	1940-1959	1939 or Earlier	1990s	1980s	1970s	1960s	Before 1960
Escambia County	3,135	11,162	9,808	26,593	28,217	17,244	22,095	6,393	19.3	21.3	22.6	13.8	22.9

Source: Shimberg Center

Year Structure Built, 2000													
	Number								Share by Decade(%)				
	1999-March 2000	1995-1998	1990-1994	1980-1989	1970-1979	1960-1969	1940-1959	1939 or Earlier	1990s	1980s	1970s	1960s	Before 1960
Santa Rosa County	2,416	8,633	7,495	12,293	9,142	4,281	3,912	947	37.8	25	18.6	8.7	9.9

Source: Shimberg Center

The information in the preceding chart shows the relative newness of the housing in Santa Rosa County compared with Escambia. While 40.6% of the housing units in Escambia have been built since 1980, 62.8% of Santa Rosa's were built since that time. This demonstrates that Santa Rosa's growth has been more recent, and also implies that their housing rehabilitation needs (and costs) might not be as substantial.

Housing Units by Type, 2000										
Place	1, detached	1, attached	2	3 or 4	5 to 9	10 to 19	20 or more	Manufactured Housing	Other	Total
Escambia County	83,261	3,872	4,446	5,158	5,013	3,325	7,459	11,935	178	124,647

Source: Shimberg Center

Housing Units by Type, 2000										
Place	1, detached	1, attached	2	3 or 4	5 to 9	10 to 19	20 or more	Manufactured Housing	Other	Total
Santa Rosa County	35,006	961	823	1,633	826	255	973	8,586	56	49,119

Source: Shimberg Center

Tenure

According to the American Community Survey 2006-2010, the homeownership rates in Escambia and Pensacola differ significantly from Santa Rosa. Santa Rosa's homeowners comprise more than 3/4 of their households, while Escambia and Pensacola were closer to 2/3 of their households, below the Florida statewide average of 70%. Current homeownership rates have declined somewhat from those estimates, as the economic and foreclosure crisis that began in 2007-2008 has resulted in a national decline of homeownership. Foreclosures have continued beyond the dates of the Census, so it is realistic to assume that the drop in homeownership rates has been a continuing trend.

Location	Homeownership Estimate	2010 Census Homeownership
Escambia	67.4%	64.9%
Pensacola	63.7%	61.6%
Santa Rosa	77.6%	76.4%

The 2010 Census provided some additional insight into the results of the difficult economy: the large percentage of vacant housing units.

Location	Vacant Units
Escambia	15%
Pensacola	12.1%
Santa Rosa	12.1%

There was some good news. The American Community Survey provided an important statistic concerning housing ownership in the Consortium. Of the owner-occupied housing units, approximately 1/3 of them were owned with no mortgage. The homes that were owned "free and clear" indicates that some of the lower income households may be retirees with assets. In that situation, a lower income does not necessarily indicate housing problems. In addition, this population may have survived the recent economic downturn more easily than their neighbors. However, any desire to change their housing situation, i.e., their housing choices, may have been affected. For example, slow sales and reduced prices would certainly have affected seniors who wished to sell their home and move to assisted living.

Location	% of Housing units with No Mortgage
Escambia	36.3%
Pensacola	36.6%
Santa Rosa	29.1%
Florida	34.6%

Source: American Community Survey 2006-2010

The lower housing costs for homeowners without a mortgage were quantified by the American Community Survey 2006-2010. The following chart shows that there are far fewer of them with a housing cost burden than their neighbors who have mortgages, or rent their residences. The information also demonstrates that housing cost burdens in the Consortium, particularly for home purchasers, are relatively less than in other parts of Florida.

Percent of households with housing cost 35% or more			
	Owners - no mortgage	Owners with mortgage	Renters
Escambia	11%	30.4%	46.6%
Pensacola	15%	31.2%	46.7%
Santa Rosa	8.9%	29%	39%
Florida	15%	38.7%	48.5%

The median gross rent for this period in Florida was \$957. All three of the Consortium's jurisdictions had median gross rent amounts that were less than that amount. (Escambia - \$816, Pensacola \$811, and Santa Rosa - \$900). Despite this, the foregoing chart shows that the rents were high in relation to household incomes, although this appears to be the case for Florida in general.

The 2010 Census provided information concerning housing tenure by race. When identified by race, ownership patterns differ significantly. The following table shows significant variation in ownership rates for the African-American population.

Ownership Rates by Race		
	General Population	African-American
Escambia	64.9%	47.2%
Pensacola	61.6%	46.4%
Santa Rosa	76.4%	61.8%

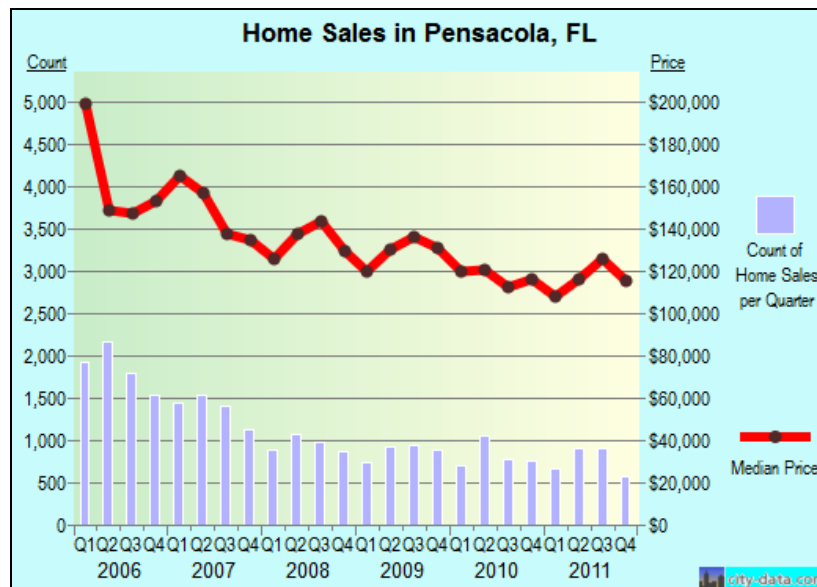
Source: Census 2010

The following charts demonstrate, in graphic terms, the decline in the number and value of home sales, and the effect on overall property values. Reduction in sales: The lack of sales is a national phenomenon, not due to a lack of inventory, but due to economic conditions. The inability to sell one's home is contributing to a lack of choice for owners whose homes are listed for sale: for seniors who may be ready to downsize or move to assisted living; or owners who have suffered employment setbacks, but cannot sell to reduce their housing costs. Reduction in values: While the value decline is difficult for existing owners, it provides previously unheard-of homeownership opportunities for credit-worthy lower income households.

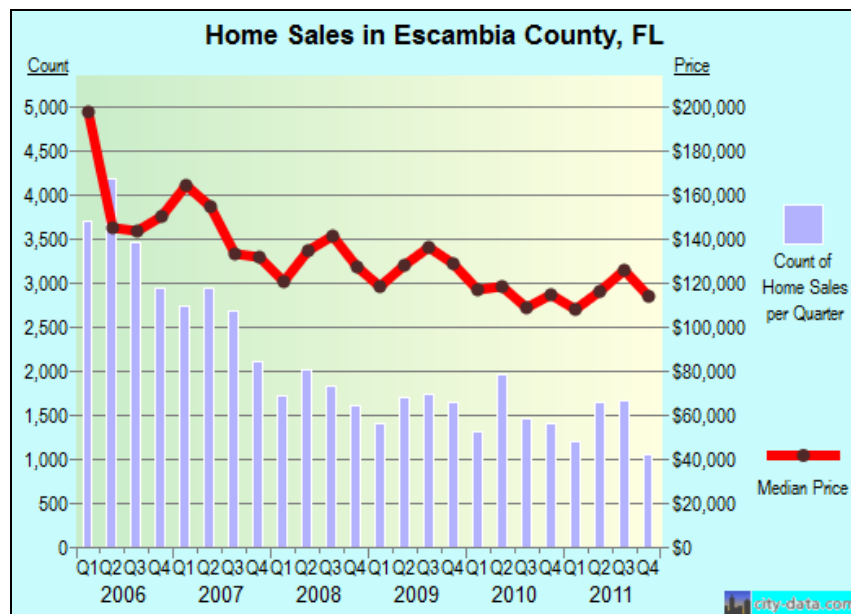
Escambia:

Number of Single Family Sales - Escambia	
Year	Sales
2010	1,161
2009	2,128
2008	3,235
2007	3,803
2006	5,438
2005	6,790
2004	6,512
2003	5,524
2002	4,930
2001	4,256
2000	4,255
1995	2,817
1990	2,208

Source: Shimberg Center



Source: city-data.com



Source: city-data.com

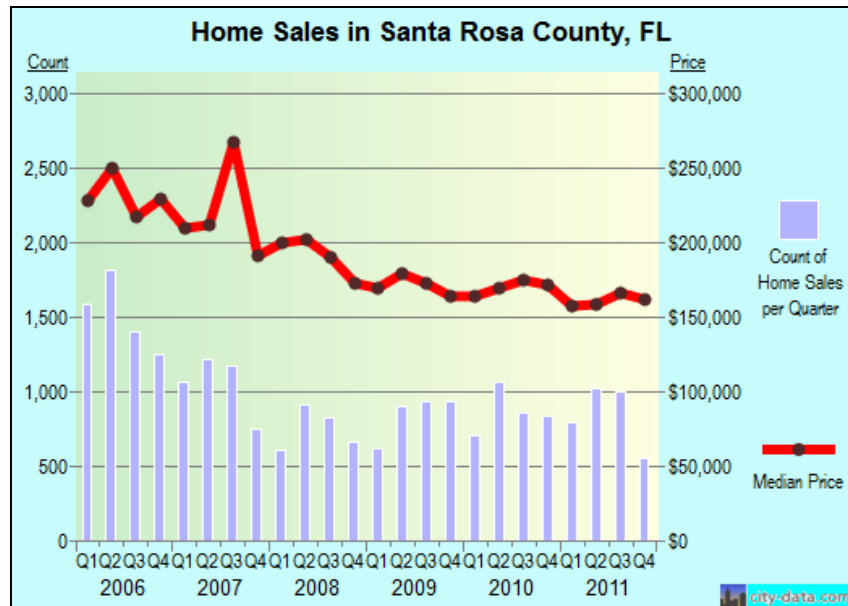
Median Single Family Sales Price - Escambia		
Year	Sales Price	Sales Price in 2010 Dollars.
2010	\$130,800	\$130,800
2009	\$143,500	\$145,574
2008	\$135,000	\$136,506
2007	\$147,500	\$154,829
2006	\$146,700	\$158,343
2005	\$143,900	\$160,331
2004	\$117,900	\$135,813
2003	\$110,000	\$130,087
2002	\$104,500	\$126,399
2001	\$98,500	\$121,094
2000	\$92,900	\$117,393
1995	\$63,000	\$89,953
1990	\$59,000	\$98,228

Source: Shimberg Center

Santa Rosa:

Number of Single Family Sales - Santa Rosa	
Year	Sales
2010	1,026
2009	1,863
2008	1,979
2007	2,556
2006	3,415
2005	3,826
2004	3,568
2003	3,721
2002	3,003
2001	2,621
2000	2,394
1995	1,764
1990	768

Source: Shimberg Center



Source: city-data.com

Median Single Family Sales Price - Santa Rosa		
Year	Sales Price	Sales Price in 2010 Dollars.
2010	\$167,650	\$167,650
2009	\$175,000	\$177,529
2008	\$182,000	\$184,030
2007	\$193,950	\$203,587
2006	\$199,600	\$215,441
2005	\$205,000	\$228,408
2004	\$155,000	\$178,549
2003	\$132,600	\$156,814
2002	\$125,000	\$151,195
2001	\$117,500	\$144,452
2000	\$110,700	\$139,886
1995	\$88,200	\$125,934
1990	\$65,700	\$109,383

Source: Shimberg Center

Both Escambia County and Santa Rosa County are participating in the Neighborhood Stabilization Program, in which foreclosed or distressed properties are purchased, rehabilitated, and sold or rented to lower income residents. Although the housing market itself is not considered to be in good shape,

and the decline in sales and values has hurt the existing homeowners, the availability of these homes, at affordable costs, provides choices that would otherwise not be available for lower income residents.

Housing for Lower Income Residents

According to the Shimberg Center, there are a total of 3,872 rental housing units for lower income people in Escambia County, and a total of 576 units for lower income people in Santa Rosa County. These include a variety of State and Federal programs, including 601 public housing units and 2,288 housing vouchers that are available to very low income residents. Farmers Home rental developments have all been included as well.

Escambia County Inventory of Federally-, State- and Locally-Assisted Rental Housing						
Development Name	City	Zip Code	Total Units	Assisted Units	Housing Program(s)	Type
Cottage Hill Apts	CANTONMENT	32533	37	37	Rental Assistance/RD; Section 515	Family
Farm Hill Apartment	CANTONMENT	43533	35	35	Rental Assistance/RD; Section 515	Family
Grantwood Apartment	CANTONMENT	32533	37	36	Rental Assistance/RD; Section 515	Family
Lake Drive Rentals ¹	Cantonment	32533	7	7	Local HOME/SHIP	Family
Wild Oak Apartments	CANTONMENT	32533	35	35	Rental Assistance/RD; Section 515	Family
Camellia Gardens	Century	32535	32	32	Housing Credits 9%; Rental Assistance/RD; Section 515	Family
Century Woods Apartments	Century	32535	36	36	Rental Assistance/HUD; Section 515	Family
Oakwood Village	Century	32535	40	40	Housing Credits; Rental Assistance/RD; Section 515	Elderly;Family
Ahepa 296	Pensacola	32504	50	50	Rental Assistance/HUD; Section 202; Local SHIP	Elderly
Alabaster Gardens	Pensacola	32505	147	147	Housing Credits; Predev. Loan Program; SAIL; State Bonds; Local HHRP	Elderly
Arbours At Ensley	Pensacola	32514	112	112	Housing Credits/Local HHRP	Family
Belmont Duplexes ³	Pensacola	32501 32506 32507	26	26	SAIL/Local HOME/SHIP	Family
Caminiti Place	Pensacola	32514	8	8	Local HOME	Family
Carr Cottages ³	Pensacola	32501 32505	6	6	Local HOME/SHIP	Family

Cerny Village Apartments	Pensacola	32526	60	60	Rental Assistance/HUD	Family
Christine House	Pensacola	32503	4	4	Local HOME	Family
College Trace Apts	Pensacola	32504	112	111	Refi Section 221(d)(4); Rental Assistance/HUD	Elderly
Devilliers Gardens	Pensacola	32501	16	16	Housing Credits 9%; SAIL	Family
Englewood Senior	Pensacola	32501	92	92	Housing Credits 9%; Local HHRP	Elderly
Fairfield Village	Pensacola	32506	72	72	Rental Assistance/HUD	Elderly
Forest Creek Apartments	Pensacola	32507	200	200	Rental Assistance/HUD	Family
Front Porch Rentals ³	Pensacola	32501 32502 32505	11	11	Local HOME/SHIP	Family
Gadsden/Grandview Rentals ^{1, 2}	Pensacola	32505	3	3	Local HOME/SHIP	Family
Government Street Housing ³	Pensacola Cantonment	32502 32533	8	8	Local HOME/SHIP	Family
Gregory Street Rentals ³	Pensacola	32501 32502	10	10	Local HOME/SHIP	Family
Harbour Place Apartments	Pensacola	32506	68	68	Refi Section 221(d)(4); Rental Assistance/HUD	Family
Hernandez House	Pensacola	32501	6	6	Rental Assistance/HUD; Section 202	Elderly
Johnson Lakes	Pensacola	32514	160	160	Housing Credits 4%; Local Bonds; Rental Recovery Loan Program; Local HHRP	Elderly;Family
Lakeview Place	Pensacola	32501	8	8	Rental Assistance/HUD;Section 202 Direct Loan	Persons with Disabilities
Lakeview Villa	Pensacola	32501	20	20	Rental Assistance/HUD;Section 202 Direct Loan	Persons with Disabilities
Lillian Housing	Pensacola	32506	11	11	State HOME; Local SHIP	Elderly
Masue Manor ³	Pensacola	32501	11	11	Local HOME/SHIP	Family
Morris Court II	Pensacola	32501	74	74	Housing Credits; Predev. Loan Program;	Family

					Local HHRP	
Morris Court III	Pensacola	32501	50	50	Housing Credits 4%; Rental Recovery Loan Program; State Bonds; Local HHRP	Elderly
Myrtle Grove Elderly Apts	Pensacola	32506	12	12	Local HOME/SHIP	Elderly
Oakwood Terrace I	Pensacola	32505	300	300	Rental Assistance/HUD	Family
Oakwood Terrace II	Pensacola	32505	100	100	Rental Assistance/HUD	Family
Palafox Landing	Pensacola	32503	96	96	Exchange; Housing Credits; State/Local HOME; TCAP; Local HHRP	Family
Pensacola Veteran Housing	Pensacola	32514	30	30	SAIL	Homeless
Pensacola Village Apartments	Pensacola	32503	200	200	Rental Assistance/HUD	Family
Pines At Warrington	Pensacola	32507	160	144	Housing Credits; Local SHIP	Family
Silurian Pond	Pensacola	32505	72	72	Housing Credits; Rental Recov. Loan Prog.; State Bonds; Local HHRP	Family
Spirit Housing ³	Pensacola	32503	8	8	Local HOME/SHIP	Family
Stoddert Place	Pensacola	32506	320	320	Guarantee; Housing Credits; Section 542; State Bonds; State HOME	Family
Sugar Hill	Pensacola	32514	51	51	Housing Credits; Rental Assistance/RD; Section 515	Family
Sunrise Apartments	Pensacola	32505	160	160	Rental Assistance/HUD; Section 236	Family
The Moorings	Pensacola	32514	200	200	Rental Assistance/HUD; Section 236	Family
Tarragona Townhomes ^{2, 3}	Pensacola	32503	4	4	Local HHRP	Family
Townsend Terrace	Pensacola	32504	8	8	State/Local HOME; Local SHIP	Family
Twin Oaks Villas	Pensacola	32506	218	218	Housing Credits	Family

Valcour Villas	Pensacola	32501 32502	8	8	Local HOME/SHIP	Family
Wesley Haven	Pensacola	36104	55	22	Demonstration Project; Local SHIP	Elderly
Wesley Scott Place	Pensacola	32505	40	40	Housing Credits; Local SHIP	Elderly
Westminster Village I	Pensacola	32501	103	103	Rental Assistance/HUD;Section 202 Direct Loan	Elderly
Westminster Village II	Pensacola	32501	95	95	Rental Assistance/HUD;Section 202 Direct Loan	Elderly
Westminster Village III	Pensacola	32501	52	52	Rental Assistance/HUD;Section 202 Capital Advance	Elderly
Westminster Village IV	Pensacola	32501	53	53	Rental Assistance/HUD; Section 202 Capital Advance	Elderly
Westwood Homes	Pensacola	32506	52	52	Refi Section 221(d)(3) MR; Rental Assistance/HUD	Persons with Disabilities
Zarragossa Street Housing	Pensacola	32502	8	8	State HOME; Local SHIP	Family
				Total	3958	

Notes:

1. Rehabilitated Unit(s)
2. Single family residences
3. Scattered site multiplexes

Sources: Shimberg Center and Escambia Consortium

In addition to the housing resources shown in the charts above and below, the City of Pensacola in cooperation with the Gulf Coast HCA Medical Center, administers 110 housing vouchers available to homeless veterans. The vouchers are provided under a partnership between the Department of Housing and Urban Development and the Veterans Administration, known as the Housing and Urban Development-Veterans Administration Supported Housing (HUD-VASH) program.

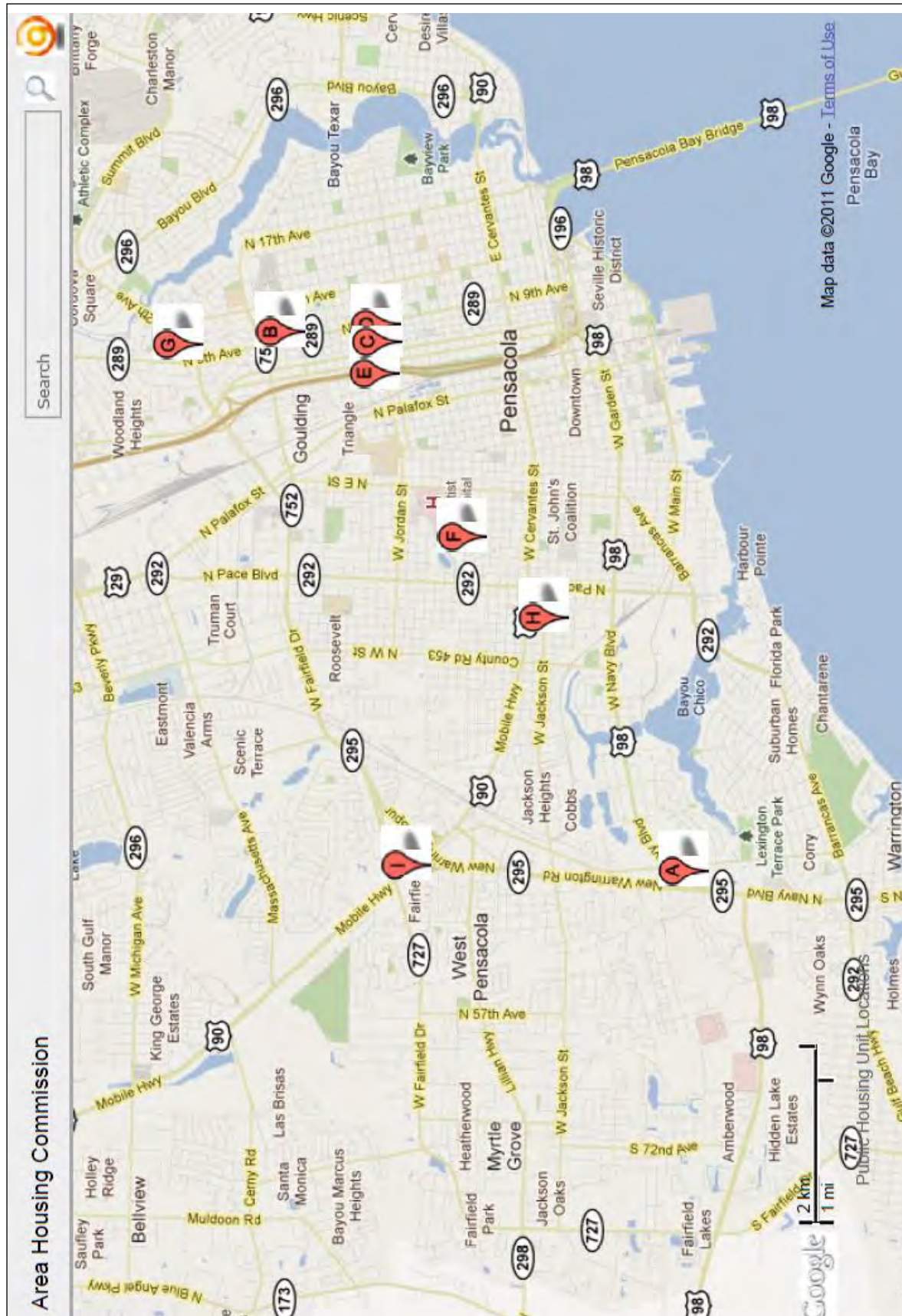
Escambia Public Housing Inventory			
PHA Name	Public Housing Units	Housing Vouchers (Sec 8)	Total
City of Pensacola	0	2,288	2,288
Pensacola (AHC)	601	0	601
Total			2,889

Source: Shimberg Center

Housing vouchers are provided to the tenant, who can use the voucher in any market-rate rental unit. The design and reality of this assistance, is that residents may use the assistance in any rental unit that they choose to rent, providing the tenant with complete freedom of choice. HUD has recognized the City's effectiveness in this regard, by annually providing "deconcentration bonus points" for the City's dispersal of housing assistance, out of high poverty areas.

The following map, preceded by the identification key, of Escambia's public housing locations, shows how well-disbursed these units are.

Key to Housing Location Map				
Letter on Map	Name	Address	Type of Housing	Number of Units
A	Moreno Court	900 South Old Corry Field Road, Unincorporated Escambia County	Public Housing	200
B	Gonzalez Court	2800 North 9th Avenue, Pensacola	Public Housing	98
C	6th Avenue	1920 North 6th Avenue, Pensacola	Public Housing	4
D	8th Avenue	1902 North 8th Avenue, Pensacola	Public Housing	4
E	Hayne Street Apts.	2001 North Hayne Street, Pensacola	Public Housing	40
F	"J" Street Apts.	1303 North "J" Street, Pensacola	Public Housing	44
G	Camelia Court	900 Rosewood Drive, Pensacola	Public Housing	25
H	Belmont & "R" Street Apts.	308 North "R" Street, Pensacola	Public Housing	16
I	Westwood Homes	4400 Westover Avenue, Unincorporated Escambia County	Owned by AHC, Elderly residences	50
J	Attucks Court	1300 West Cervantes	Public Housing	172



Santa Rosa County Inventory of Federally-, State- and Locally-Assisted Rental Housing						
Development Name	City	Zip Code	Total Units	Assisted Units	Housing Program(s)	Type
Wind Meadow Apts	Gulf Breeze	32563	46	45	Rental Assistance/RD;Section 515	Family
Astor Village	Milton	32570	50	50	Rental Assistance/HUD;Section 515	Elderly
Country Haven Apts	Milton	32570	43	42	Rental Assistance/RD;Section 515	Elderly
Deer Run Villas	Milton	32571	20	20	Section 515	Family
Oakwood Apartments	Milton	32570	44	43	Rental Assistance/RD;Section 515	Family
Regency Arms Apts	Milton	32570	53	52	Section 515	Family
Scenic View Apts	Milton	32570	24	23	Rental Assistance/RD;Section 515	Family
Andora Villas	Pace	32571	35	34	Section 515	Family
Country Village	Pace	32571	35	34	Rental Assistance/RD;Section 515	Family
Bell Ridge	Pace	32571	122	122	Housing Credits 9%	Family
Bell Ridge II	Pace	32571	48	48	Housing Credits 4%;Rental Recovery Loan Program;State Bonds	Family
Magnolia Crossing	Pace	32571	56	56	Housing Credits 4%;Rental Recovery Loan Program;State Bonds	Family
Source: Shimberg Center		Total	576			

Two of the County's housing credit projects, totaling more than 200 units, are recent developments, located in the vicinity of rapidly-growing Pace, where transportation to Escambia's employment centers is available.

Disabled Population

The Shimberg Center provides countywide estimates as of the year 2005 of households with disabled persons, and the income and housing characteristics of those households. The households shown in the following charts are those with at least one disabled person age 15+, and a severe cost burden (over 50% of income) for housing. In addition to the numbers shown below, the Shimberg Center identified that 509 of these households in Escambia and 78 of these households in Santa Rosa reside in substandard housing. Also included in their data, was the number of these households that receive Social Security or SSI: 3,001 in Escambia; and 1,129 in Santa Rosa. The reasons for that low percentage were not evident.

Escambia's Lower Income Disabled - Tenure and Income			
Household Income (percent of median income)	Tenure		Total
	Owner	Renter	
0-20%	904	1,384	2,288
20.1-30%	654	1,056	1,710
30.1-50%	780	722	1,502
50.1-60%	224	52	276
Total	2,562	3,214	5,776

Source: Shimberg Center

Santa Rosa's Lower Income Disabled - Tenure and Income			
Household Income (percent of median income)	Tenure		Total
	Owner	Renter	
0-20%	422	261	683
20.1-30%	268	260	528
30.1-50%	514	195	709
50.1-60%	137	10	147
Total	1,341	726	2,067

Source: Shimberg Center

Summary

The Consortium is generally rural in nature, with the exception of the City of Pensacola.

Santa Rosa County has experienced significant growth, exceeding expectations and projections. Escambia's growth has been more stable, actually less than projected.

Escambia county is racially diverse, with a population that is 68.9% white, 22.9% black, and 4.7% Hispanic. Pensacola is the most diverse part of Escambia, with 66% white, 27.1% black, and 4.3% Hispanic. Santa Rosa County is much less diverse, with a population that is 87.1% white, 4.5% black, and 4.3% Hispanic. The Hispanic population is significantly less than Florida's overall Hispanic population of 22.5. Florida's overall black population is 17%.

The Consortium's population is steadily aging.

Residency is relatively stable. 90% of the Consortium's population lived in the same county the previous year.

Income levels vary dramatically by race. In Escambia County, Black households' median income was 53.8% of the median income of white households. Hispanic households' median income was 74% of white, non-Hispanic median income. In Santa Rosa County, Black households' median income was 70% of the median income of white households. Hispanic households, however, had a higher median income than white, non-Hispanic households.

The percent of people living in poverty is consistent with the income information. In Escambia approximately one person in five is living in poverty; approximately two black persons in five are living in poverty. Pensacola numbers are similar but not quite as dramatic. Information available on Santa Rosa indicates less of a problem.

Santa Rosa County's housing stock is relatively new, with more than 60% of the units built since 1980. Escambia's are much 60% of Escambia's housing units were built prior to 1980.

Rents in the area are lower than Florida's average, but renters here, as in other parts of Florida, pay more than 35% for their housing cost.

Ownership patterns vary by race. Fewer African-Americans than other races own their homes.

The economic conditions of the past 4-5 years has been difficult for homeowners, with values dramatically reduced, sales stalled, and foreclosures high. This is a national issue, and is evident in the Consortium.

Fair Housing Status

Fair Housing Research

Research performed for this section of the Analysis includes the following:

- Discussions with City and both counties' staff and housing program providers
- Review of local codes, zoning, web sites, public policies, and public documents
- Review of the City's and counties' Local Housing Assistance Plans and Housing Incentive Plans
- Review of Pensacola's and Escambia's Consolidated Plans
- Review of City and both counties' housing assistance programs
- Contact with the Escambia-Pensacola Human Relations Commission

Regulatory Relief

In 1992, in order to participate in the State's "SHIP" affordable housing program, the City and both counties all established Affordable Housing Advisory Committees (AHACs) to undertake a thorough review of their policies and regulations relating to housing development. In 2009, those committees were re-tasked to review established policies and procedures, ordinances and development regulations, and the adopted local comprehensive plans, and to recommend specific initiatives to encourage or facilitate affordable housing. The committees meet quarterly, and are comprised of homebuilders, for-profit and non-profit providers of affordable housing, affordable housing lenders, and residents.

Zoning

The City's and Counties' residential zoning codes are consistent with Florida Statutes 419.001(2) which provide that a home with six or fewer residents, whether or not related, are deemed to be single-family residential and are allowed in single-family (or multifamily) zoning without special approval. Because there is no special zoning approval, this provision is very helpful to fair housing: since there are no zoning hearings, there is no opportunity for the NIMBY ("not in my back yard") discriminatory attitude with regard to race, disability, or family status to surface. It is also helpful to organizations providing group homes for disabled residents by enabling those organizations to purchase existing homes in virtually any residential neighborhood, to be used as small group homes.

Zoning ordinances in the City of Pensacola and unincorporated Escambia County specify allowable development in various zones. The ordinance allows flexibility regarding affordable housing, including: placement of manufactured homes, modular construction, setback waivers, and density variations.

None of the zoning policies give indication of discriminatory restrictions.

Public Policies

Throughout this review of City and County activities and codes, policies and planning, services and requirements, there were no items which surfaced which gave any indication of restrictive attitudes or practices. The City and Counties have Affordable Housing Advisory Committees that are charged with examining local practices and proposed of local policies, ordinances, regulations and plan provisions that may be exclusionary or increase the cost of housing.

The City and Counties all provide expedited permitting processes for affordable housing development and construction. Additionally, they all have density bonus programs that provide incentives for developers of affordable and/or workforce housing.

The City of Pensacola (FHO #51-80), Escambia County (FHO #85-26), and Santa Rosa County (90-53) all have Fair Housing Ordinances that declare to be their policies to ensure equal opportunity to obtain adequate housing by all persons, regardless of race, color, religion, sex, national origin, place of birth, age (provided the person has the capacity to contract), marital status, ancestry, military status or physical disability and, to that end, to prohibit and eliminate discrimination in housing by any person.

Santa Rosa County has a Fair Housing policy statement on its web site, that also provides a contact person "for more information on fair housing, or to register a fair housing complaint." In addition, Santa Rosa County annually declares Fair Housing Week. A copy of this year's press release is included in the Appendix.

An important indication of public policy is that the City and both counties have taken steps to provide affordable housing opportunities to their residents. They have worked together to achieve status as a "consortium," which enables them to receive federal HOME funds for affordable housing. (HOME funds are provided as an entitlement to "participating jurisdictions" that meet population and housing condition thresholds; adjoining non-entitled jurisdictions may form a single entity known as a "consortium" in order to meet the thresholds.) The HOME program is complicated to administer and implement, and is not often sought by locations that have not been designated as participating jurisdictions.

Public Actions to Promote Fair Housing

Escambia County and the City of Pensacola both provide funding to the Escambia-Pensacola Human Relations Commission. The Commission is a full-time, fully-staffed office that provides assistance to residents with complaints of discrimination or unfair treatment in employment and housing. The Commission has a specific individual assigned to handle housing complaints, and has an excellent web site that boldly provides the HUD toll-free number as well as its own procedures for mediation.

The Commission's web site, however, is completely in English. At the very least, the HUD telephone number could be referenced in Spanish and/or a link to the Spanish language version of HUD's fair housing web site (espanol.hud.gov/complaints/housediscrim.cfm) could be provided.

Sale, Rental, Brokerage Services

The *Pensacola News Journal* print edition, which serves the area, prominently places a fair and equal housing statement at the beginning of their classified sections of rental homes and homes for sale. There were no noted references which might have indicated discriminatory practices ("exclusive," "private," "protected," etc.) However, the online version of the Pensacola New-Journal was not similarly compliant. The real estate homebuyer section did not contain a logo or any information concerning fair housing. The online version is "powered by HomeFinder.com." The online rental section also failed to contain the logo or any information concerning fair housing. That section is provided by Apartments.com.

If a person is looking for affordable rental housing in the Pensacola area, a Pensacola Area Housing Commission web search connects the person the web site affordablehousingonline.com. This site provides a listing of affordable complexes with information on each of them. Some complexes provide

more information than others; at a minimum they have addresses and phone numbers. Additional information for some of the developments includes maps, photographs, sizes of units, rental amounts, income qualifications, amenities, pet policies, and more.

The Pensacola Association of Realtors makes fair housing a priority. In the 1980's it coordinated the establishment of the Community Housing Resource Board. Currently it collaborates with the Escambia-Pensacola Human Relations Commission (HRC), the local fair housing agency that administers and enforces the local fair housing ordinances. Both the Realtors Association and HRC provide training and orientation sessions for newly licensed and recertifying realtors, promoting the individuals' signature of the voluntary Affirmative Marketing Agreement with HUD.

Cost, Availability, Location

Housing costs, and the availability of affordable housing in a variety of locations, are often the primary factors limiting free choice in selecting housing. The cost issue is particularly true in Florida, and in the Consortium, as evidenced by the housing cost information in the Community Profile section of this document.

Both the City and the Counties are addressing this issue with a variety of financial assistance programs for owner households that are lower income or have disabled household members. In addition, the current housing market, with large numbers of short sales and foreclosures, while devastating for the previous owners, does provide increased opportunities for lower income persons to attain homeownership, and in locations that may have previously been unattainable due to cost.

The Community Profile section contains listings of the affordable housing developments in the Consortium. Those listings show that affordable housing is available in a wide variety of locations. Individual affordable units are also being provided through the Neighborhood Stabilization Program.

General

In addition to the Affordable Housing Advisory Committee, Santa Rosa County also has a housing coalition. The Santa Rosa County Housing Coalition is tasked with identifying barriers to quality workforce housing and ways to reduce or eliminate those barriers. the Coalition is made up of housing supporters, including employers, non-profit and for-profit housing developers, credit counselors, utility providers, mortgage lenders, realtors, and community service providers. The Coalition serves as a resource for potential homebuyers and renters, to help them reach their housing goals. Meetings are held throughout the year.

The "NIMBY" (Not in My Back Yard) attitude that appears throughout the country, occasionally surfaces in Pensacola/Escambia/Santa Rosa. This attitude, that housing for lower income residents will somehow affect property values, generally reflects an attitude about resident income levels rather than being race-related. Ensuring top quality in site planning, construction, and management is one way that the local governments can address this problem on a long-term basis. Scattered site housing is another method that is used to provide a variety housing choices for lower income residents.

Throughout this review of activities and codes, policies and planning, services and requirements, there were no items that surfaced that gave any indication of restrictive attitudes or practices.

Home Purchase Lending - HMDA Data

Introduction

Banks, credit unions, savings banks, savings and loans, and mortgage companies are required by the Home Mortgage Disclosure Act to report data on mortgage loan applications and activity. The data is collected by the Federal Financial Institutions Examination Council and is made public. This data is known as "HMDA data."

HMDA statements are produced annually in a table format, which includes information on loans: number applied for, originated, not accepted, denied, withdrawn, or incomplete.

Review of HMDA Data

2009 and 2010 HMDA data was reviewed in an effort to identify problems in area lending. (Some of the numbers in the charts may differ from others due to the different years.) Areas of review, and results, follow:

1. Review for total (percentage) mortgage loans by race

Mortgage loan activity was sorted and summarized by race to determine whether the success rate of mortgage loan applications was similar amongst the different racial categories. High rejection rates for minority applicants could raise questions about lenders following policies or practices that discriminate against those applicants.

Results of Review

In Pensacola and unincorporated Escambia, success rates of mortgage loan applications were lower for African-Americans than for any other groups. In Santa Rosa, the African-American loan approval rate is higher than that of the white population. It is interesting to note, however, that in all three locales, the African American approval rate exceeds Florida's, which was 54% in 2010.

The overall success rates of the Asian population is better than that of the white population, indicating that their choices are not being limited. The remaining categories are considered to be inconclusive due to the smaller numbers of applicants.

Home Purchase Loan Approval/Denial by Race, 2009				Pensacola	
Application Count				Approval Rates	
Applicant Race	Loan Originated	Application Denied	Other	Total App's	% Approved
American Indian/Alaska Native	1		1	2	50.0%
Asian	10	4	2	16	62.5%
Black/African American	23	9	5	37	62.2%
Hawaiian/Pacific Islander	6		1	7	85.7%
White	405	47	82	534	75.8%
Not Available	40				
Not Available	16				

Data Source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Home Purchase Loan Approval/Denial by Race, 2009				Escambia	
	Application Count			Approval Rates	
Applicant Race	Loan Originated	Application Denied	Other	Total App's	% Approved
American Indian/Alaska Native	9	5	4	18	50.0%
Asian	41	5	9	55	74.5%
Black/African American	177	54	38	269	65.8%
Hawaiian/Pacific Islander	17	1	3	21	81.0%
White	1,408	261	292	1,961	71.8%
Not available	196				
Not available	30				

Data Source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Notes: "Other" includes applications that were approved but not accepted, applications withdrawn by the applicant, and files closed for incompleteness. Excludes loans that were purchased by a financial institution and pre-approval requests.

Santa Rosa County has much better overall approval rates than Escambia/Pensacola. This may be a result of their higher income levels. It could also be because they still have local community banks.

Home Purchase Loan Approval/Denial by Race, 2010				Santa Rosa	
	Application Count			Approval Rates	
Applicant Race	Loan Originated	Application Denied	Other	Total App's	% Approved
American Indian or Alaska Native	11	2	1	14	78.6%
Asian	30	2	5	37	81.1%
Black or African American	62	8	9	79	78.5%
Native Hawaiian or Other Pacific Islander	9	2	0	11	81.8%
White	1,440	256	267	1,963	73.4%
Not Available	232				
Not Available	5				

Data Source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

A review of the following HMDA data for approvals/denials of applications by Hispanics yields results similar to the results for African-Americans. In Pensacola and unincorporated Escambia, Hispanic applicants do not fare as well as non-Hispanics. In Santa Rosa, however, Hispanic applicants have a higher loan approval rate than non-Hispanics. As is the case for African American applicants, all three locales have better approval rates for Hispanic applicants than the overall rate for the State of Florida, which was 55.6% in 2010.

Home Purchase Loan Approval/Denial by Hispanic/Latino Ethnicity, 2009						
Application Count					Approval Rates	
Place	Applicant Ethnicity	Loan Originated	Application Denied	Other	Total applications	Total approved
Pensacola	Hispanic or Latino	12	5	2	19	63.2%
Pensacola	Not Hispanic/Latino	430	56	87	573	75.0%
Escambia	Hispanic or Latino	48	6	16	70	68.6%
Escambia	Not Hispanic/Latino	1,593	316	329	2,238	71.2%
Santa Rosa	Hispanic or Latino	61	10	4	75	81.3%
Santa Rosa	Not Hispanic/Latino	1,489	250	270	2,009	74.1%

Data source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Home Purchase Loan Application Denial Reasons, 2010 - Pensacola		
Denial Reason	Applications (Number)	% of Denials
Debt-to-income ratio	13	19%
Employment history	1	1%
Credit history	11	16%
Collateral	17	25%
Insufficient cash (downpayment, closing costs)	1	1%
Unverifiable information	3	4%
Credit application incomplete	4	6%
Other	7	10%
Not avail.	11	16%
	68	100%

Data source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Home Purchase Loan Application Denial Reasons, 2010 - Escambia		
Denial Reason	Applications (Number)	% of Denials
Debt-to-income ratio	70	18%
Employment history	10	3%
Credit history	86	22%
Collateral	56	14%
Insufficient cash (downpayment, closing costs)	8	2%
Unverifiable information	12	3%
Credit application incomplete	17	4%
Mortgage insurance denied	2	1%
Other	35	9%
Not avail.	92	24%
Totals	388	100%

Data source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Home Purchase Loan Application Denial Reasons, 2010		Santa Rosa	
Denial Reason		Applications (Number)	% of denials
Debt-to-income ratio		61	20%
Employment history		12	4%
Credit history		88	28%
Collateral		29	9%
Insufficient cash (downpayment, closing costs)		8	3%
Unverifiable information		5	2%
Credit application incomplete		26	8%
Other		24	8%
Not avail.		59	19%
Totals		312	100%

Data source: 20010 HMDA Web Report

Calculations: Florida Planning Group, Inc.

Perhaps the most important information concerning possible lending disparities for protected groups, is the information on the reasons for denial of mortgage loan applications. The following numbers were obtained from the HMDA Web Report for the Pensacola MSA (Escambia and Santa Rosa Counties). When percentages are calculated, the denial rates can be compared to determine whether the denial rates are consistent amongst groups.

Reasons for Denial of Applications, 2010										Combined Escambia/Santa Rosa					
	Debt-to-Income Ratio		Employment History		Credit History		Collateral		NSF Cash		Unverifiable Info		Credit Application Incomplete		Other
Black/African-American	22	35%	0	0%	26	41%	3	5%	2	3%	4	6%	2	3%	4
White	118	31%	20	5%	15	4%	84	22%	17	4%	19	5%	38	10%	73
Hispanic/Latino	5	36%	1	7%	1	7%	0	0%	0	0%	2	14%	1	7%	4
Not Hispanic/Latino	126	28%	23	5%	60	13%	94	21%	22	5%	22	5%	38	8%	73

Data source: 2009 HMDA, Shimberg Center

Calculations: Florida Planning Group, Inc.

Denial rates are generally consistent amongst the different groups, except that credit history seems to be a significant reason for denial of African-American applications. The only other significant percentage difference is for Hispanic/Latino applicants in the "unverifiable information" category, but the numbers for Hispanic/Latino denials are too small for that percentage to be statistically significant.

2. *Review for mortgage loans by joint occupants*

In previous years, it was possible to review home mortgage data for joint occupants to determine whether the success rate of mortgage loan applications was similar to other categories. High rejection rates for joint occupant applicants could raise questions about lenders following policies or practices that discriminate against applicants based on familial status. However, information on joint occupants by locality is no longer available to the general public, so that analysis could not be included in this report.

Existing Programs and Citizen Participation

The Escambia Consortium undertakes a number of programs to provide information and assistance and to provide fair housing and affordable housing opportunities for its residents:

A. Fair Housing Ordinances

The City of Pensacola (FHO #51-80), Escambia County (FHO #85-26), and Santa Rosa County (90-53) all have Fair Housing Ordinances that declare to be their policies to ensure equal opportunity to obtain adequate housing by all persons, regardless of race, color, religion, sex, national origin, place of birth, age (provided the person has the capacity to contract), marital status, ancestry, military status or physical disability and, to that end, to prohibit and eliminate discrimination in housing by any person.

Santa Rosa County has a Fair Housing policy statement on its web site, that also provides a contact person "for more information on fair housing, or to register a fair housing complaint." In addition, Santa Rosa County annually declares Fair Housing Week. A copy of this year's press release is included in the Appendix.

B. The Escambia-Pensacola Human Relations Commission

The City of Pensacola and Escambia County both provide funding for the Escambia-Pensacola Human Relations Commission for "fair housing education, intervention and mediation services." The Commission is a significant fair housing resource for members of the public and for housing providers, by providing a resource for questions concerning the local fair housing ordinances and the federal Fair Housing Act; assisting with complaint resolution and/or filing; providing intake/screening meetings at community centers; and training sessions with consumer credit counselors, Catholic Services clients, the Association of Realtors, and other organizations. Their easy-to-use website includes the HUD Fair Housing hotline.

C. Online Services

The City and both counties have exceptional web sites for their housing and community development programs. This provides easy access for persons with disabilities, and for residents who have difficulty coming to the public offices during working hours. Available online are formal documents and plans, program brochures, funding information and explanations, maps, income limits, and more.

All of the Consortium members (City of Pensacola, Escambia County, and Santa Rosa County) provide live streaming of their City Council/County Commission meetings and other governmental meetings, such as CRA and committees. These meetings remain available online as videos. The web availability of these meetings provides access for physically disabled residents as well as families with children, who otherwise might not be able to, or find it convenient to, attend.

D. Multi-Lingual Access

The Escambia County website provides a one-click translation, through Google, to all of its content, in 53 languages. This makes available clear and accurate information for residents from other countries who are not fluent in the English language.

E. Assistance with Formal Complaints

The City of Pensacola and Escambia County both provide funding, through CDBG of the Escambia-Pensacola Human Relations Commission. In addition to the many other services provided by that organization, their Fair Housing Compliance Officer educates and assists residents who believe that they have been discriminated against. She advises them concerning the filing of formal complaints, either with her organization, or with U.S. HUD.

F. Citizen Participation

The Consortium has an active citizen participation program, with many opportunities for residents to provide input and be a part of program planning. The City and both counties each have an Affordable Housing Advisory Committee that includes representatives of low-income areas as well as housing providers. The Consortium holds public hearings to request resident input on housing and community development needs, as well as other public meetings to discuss program progress and procedures. Meetings are publicly advertised and open to the public. Participation can be difficult for disabled residents; the web sites provide access for disabled residents as well as the general population.

G. Public Meetings and Forums

The City and Counties provide workshops for the public in order to provide information when new programs are being initiated, or when new applications are being taken. They also participate in a variety of local events, providing information on housing programs as well as providing discrimination complaint information. Examples of events in which the housing staff have participated are: Escambia County, City of Pensacola and Santa Rosa County Fair Housing Month Proclamations, presented in televised public sessions; Pensacola - weekly eligibility briefings for Section 8 rental assistance applicants, the Mayor's Neighborhood Leaders' Luncheon, the City's Neighborhood Leadership Academy, the Gulf Coast Citizen Diplomacy Council; Santa Rosa - the LIVE FREE flyer is posted in each county building and major department area, the County Housing Coalition, Santa Rosa County Housing Coalition, newspaper articles announcing and discussing Fair Housing month/week, month-long display (outside) of a Fair Housing banner.

H. Homeownership classes for recipients of home purchase assistance and others

All applicants for home purchase assistance must complete homeownership classes designed to help them to be informed buyers and successful owners. The classes are open to anyone. They do not have to be program applicants or recipients. The classes include fair housing training to ensure that homebuyers know their rights and what to do if they feel that those rights have been violated.

I. Housing Counseling

Housing counseling is provided for all homebuyers who receive assistance through the Consortium's housing programs. This includes pre-purchase, post-purchase, and credit counseling. The program is designed to enable successful homeownership for persons who may have dreamed of owning a home, but have not had the support structure to advise them of the many responsibilities attendant thereto.

J. Fair Housing Brochures

The Consortium provides multiple hand-outs, some in Spanish. These include: "Basic Facts About the Fair Housing Act," "Fair Housing Isn't a Choice. It's the Law," "How Do You Spot Housing Discrimination?," "Beware of Foreclosure Rescue and Loan Modification Scams," "Don't Lose Your Home! How to Prevent Foreclosure," "Fair Housing - It's Your Right."

K. Fair Housing Surveys

Both the Escambia Consortium and the Escambia-Pensacola Human Relations Commission undertake periodic surveys to obtain information on whether residents believe that they are being discriminated against, resident follow-up actions, and the effectiveness of the public information programs. A copy of the fair housing section (Part IV) of the 2010 ConPlan Survey, and the compilation of results, is included in the Appendix. A copy of the 2011 Human Relations Commission survey is also included in the Appendix; however, the chart of results is too large to include.

L. Financial Assistance Programs

The Consortium participates in several affordable housing programs that provide financial assistance for housing and related services to lower income residents. These programs attempt to address the economic impediments for lower income households. Since the African American populations in Escambia and Santa Rosa, and Hispanic populations in Escambia, generally have lower incomes than the population as a whole (See Consortium Profile) the financial assistance provides assistance for them to access housing in locations that might otherwise not be affordable. The programs include: CDBG, HOME, NSP, and SHIP.*

- Housing Rehabilitation (Escambia, Pensacola, and Santa Rosa) - for homeowners who choose to remain in their homes, but their homes require repairs. This program specifically provides funding for handicapped accessibility for persons with a disability (ramps, doors widened, etc.).
- Home Purchase Assistance (Escambia and Santa Rosa)- for household that choose to purchase homes, but may not be able to afford the homes or locations that they choose.
- Housing Counseling and credit counseling - for persons who would like to purchase homes but have credit issues that prevent their ability to achieve that choice. Also to assist with budgeting and preparation for the expenses attendant to homeownership.
- Foreclosure Prevention (Escambia)- to enable homeowners who have had financial challenges to keep their homes
- Foreclosure Prevention Counseling (Pensacola) - to provide financial advice to homeowners with financial challenges so that they can keep their homes
- Handicapped Accessibility (Escambia) - for improvements to public facilities to improve their access for physically disabled residents
- The Neighborhood Stabilization Program, operating throughout the Consortium, purchases and rehabilitates foreclosed and abandoned properties and makes them available at affordable costs for lower income residents.
- Density Bonus Plan for Workforce Housing - Escambia County, Pensacola and Santa Rosa all have density bonus programs within their respective Local Development codes that provide incentives for the development of workforce and/or affordable housing.

* The State's affordable housing program known as "SHIP" was de-funded by the State legislature in 2009 and 2010. Efforts continue to restore the program to full funding.

Fair Housing Complaints

In order to evaluate the current fair housing conditions in the Escambia Consortium, records concerning any fair housing complaints or lawsuits which have been filed or discussed during the past five years were researched. Staff, nonprofit organizations, local attorneys, and federal housing officials were questioned, and records were researched in order to provide the recent history of fair housing problems.

Local Legal Services

Legal Services of North Florida provides legal advice for the 16 counties of North Florida, from Jefferson County west to the Alabama border. Mia Adams, Esq. was not available to discuss this study until the report had been completed and was in production. Her comments are therefore included in the Appendix.

Northwest Florida Legal Services, Inc. provides legal advice for residents of Escambia and Santa Rosa Counties. When they were contacted concerning fair housing issues or complaints, they advised that they hadn't had any in "quite a few years."

Local

The Escambia-Pensacola Human Relations Commission, which receives funding by both the City of Pensacola and Escambia County, employs a Fair Housing Compliance Officer, Ms. Barbara Hoard, who has worked there for 34 years, and seems quite knowledgeable of fair housing issues. She advised that the majority of individuals who call them are calling because they want information concerning fair housing. They receive many calls, "95% are not actually discrimination, as there are usually 2,3,4 sides to every scenario."

The calls that they receive are usually landlord-tenant issues, many of them related to ADA. Calls come from landlords, "Do I have to..." and tenants, "Do I have the right to ask..." When working with clients, Ms. Hoard advises them that the Human Relations Commission does not represent HUD, and the worst penalty for violating the City/County Fair Housing Ordinances is a \$500 fine. The result is generally that the complainants prefer to file a formal complaint with HUD, in the hope or expectation of stronger penalties.

Federal

The U.S. Department of Housing and Urban Development (HUD) maintains a staff of fair housing specialists who receive and investigate reports and allegations of housing discrimination. The Atlanta Fair Housing Office of the U.S. Department of Housing and Urban Development maintains the compliance records on a countywide basis. The Office was requested to provide information concerning any fair housing complaints filed in the Consortium during a recent 5-year period, and their resolution.

A review of the complaints filed 2005 - 2010, shows a large number of complaints that were disposed of with a "no cause determination" or "complainant failed to cooperate." However, the fact that residents were aware of the system and knew how to access it, is encouraging, particularly considering the variety

of bases on which residents filed complaints: race, sex, disability, religion, family status, and national origin.

Of the five complaints for which compensation was provided, and the sixth with a no-compensation successful settlement, all but one concerned failure to make reasonable accommodation for disability. The other case, for which substantial compensation was awarded, concerned discriminatory financing (real estate). The complete listing of fair housing complaints for both counties is included in the Appendix.

Identification of Impediments

Fair Housing Findings/Impediments

The Consortium has undertaken a variety of effective fair housing activities. There are Fair Housing Ordinances, observances of Fair Housing Week and Month, good online services, public meetings and forums, funding of the Escambia-Pensacola Human Relations Commission, Affordable Housing Advisory Committees, However, this analysis has identified the following information that may reveal, or result in, impediments to fair housing choice.

1. The Escambia County web site and the web site for the Neighborhood Enterprise Foundation (lead agency of the Consortium) both contain one-click links to provide content in other (53) languages. This service, provided through Google, makes all of the online housing and community development information available to persons of national origin other than USA. However, the web sites contains no specific information concerning fair housing.
2. The Consortium has a much smaller Spanish-speaking population than Florida as a whole. However, the Spanish-speaking population is increasing and will require specific attention. (Entities should monitor the growth and be prepared to respond with brochures, translation services, etc.)
3. HMDA data reveals that in Escambia/Pensacola, a larger percentage of African-Americans and Hispanics are being denied mortgages than whites. The most significant reason for higher denials for African-Americans is their credit history. The most prevalent reason for denial of loan applications for Hispanic applicants was unverifiable information. Santa Rosa's HMDA data does not indicate similar issues.
4. The Escambia-Pensacola Human Relations Commission web site prominently features fair housing as one of its five "pages." It is clear and easy to navigate, contains HUD's toll-free discrimination hot line, and online complaint information. However, it is only in English.
5. Fair Housing complaints to HUD in the past five years that resulted in a judgment were predominantly disability-related. (failure to make reasonable accommodation)
6. Both the Escambia Consortium and the Escambia-Pensacola Human Relations Commission have recently conducted housing discrimination surveys. Responses in many cases were similar.
7. While the Pensacola News Journal prominently shows a fair and equal housing statement in their real estate sections, there is no fair housing information in the online version.

Recommended Actions

The findings identified in the previous section have revealed the need for several actions on the part of the Escambia Consortium in order to address and remedy the impediments to fair housing choice. The following actions are recommended, with identified timetables for implementation. All of the actions are to be undertaken by the lead agency of the Consortium, Escambia County's Neighborhood Enterprise Foundation, in cooperation with identified program partners.

1. The Neighborhood Enterprise Foundation (lead agency of the Consortium) web site should display information concerning fair housing. This should include as much as possible of the following: links or references to the Escambia-Pensacola Human Relations Commission; a link to HUD's housing discrimination web page and other fair housing web resources; and the phone number of the HUD hotline fair housing information.

Addresses finding number 1.

Timetable: Begin work with IT provider in October 2012. Implement by October 2013.

2. The increase in Spanish-speaking residents, while much slower than other parts of Florida, has provided the Consortium with more time to prepare tools to address the possible language barrier. The Consortium's member entities should monitor the growth of this population in order to provide brochures, translation services, etc. when needed.

Addresses finding number: 2

Timetable: Revisit population statistics in mid-2014 and annually thereafter.

3. HMDA data has revealed that credit history (African-Americans) and unverifiable information (Hispanics) are the two primary reasons for mortgage loan denials for these groups. Consortium staff should consult with lenders and discuss whether there are steps that can be taken to prepare and/or assist applicants with these issues.

Addresses finding number: 3

Timetable: March 2013

4. The Escambia-Pensacola Human Relations Commission web site has no Spanish-language content. Although the area's Spanish-speaking population is not large, they may still require assistance with fair housing. The Commission should be asked to add information in Spanish, even if just a reference to HUD's Spanish language information. (A link to HUD information and discrimination complaint form is: <http://portal.hud.gov/hudportal/documents/huddoc?id=903-a.pdf>)

HUD forms, brochures, and webcasts are available in many languages at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunity/promoting_fair_housing/lep

Addresses finding number: 4

Timetable: July 2014

5. Fair Housing complaints concerning disability can be addressed by increasing the visibility and information to landlords concerning reasonable accommodation. The Pensacola Association of Realtors and the Human Relations Commission should be asked to provide increased emphasis on this subject in their trainings. In addition, since both Santa Rosa and Escambia are home to military bases, the poster showing a disabled veteran (see Appendix) should be distributed.

Addresses finding number 5

Timetable: January 2013

6. Housing discrimination surveys have recently been undertaken by the Escambia Consortium (in 2010) and the Human Relations Commission (in 2011). Preparers of the surveys should meet to compare results and determine what patterns and/or consistent information have been reflected in the surveys. Discussions should include ideas for addressing the patterns.

Addresses finding number 6

Timetable: December 2013

7. The *Pensacola News Journal* provides information on fair housing, but the online version does not. Newspaper readership is increasingly an online function; therefore, the online versions should contain the same important information as the print versions. Adding fair housing information to the online version may prove to be difficult, as the online homebuyer section is provided by HomeFinder.com, and the rental section is provided by Apartments.com. Nonetheless, the *Journal* should be requested to provide the fair housing logo and information.

Addresses finding number 7

Timetable: October 2012

ANALYSIS OF IMPEDIMENTS - SUMMARY MATRIX

IMPEDIMENTS TO BE ADDRESSED (Listed in the order shown on the previous pages)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS	BENCHMARK (In which ConPlan year do you plan to achieve this?)	PROPOSED INVESTMENT (Amount and funding source)	YEAR TO BE COMPLETED	DATE COMPLETED	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
The Escambia County and Neighborhood Enterprise Foundation web sites contain no specific information concerning fair housing.	Better/easier access to information for both residents and housing providers.	The Neighborhood Enterprise Foundation (lead agency of the Consortium) web site should display information concerning fair housing. This should include as much as possible of the following: links or references to the Escambia-Pensacola Human Relations Commission; a link to HUD's housing discrimination web page and other fair housing web resources; and the phone number of the HUD hotline fair housing information.	Escambia Consortium	2013	Staff time. Could also include time expended by IT staff which may need to be covered on an hourly basis by CDBG program funds.	2013		
No specific attention or programs have been implemented for the Spanish-speaking population.	Being prepared to provide services as the Spanish-speaking population increases.	The Consortium's member entities should monitor the growth of this population in order to provide brochures, translation services, etc. when needed.	Escambia Consortium	2014	Staff time.	2014		
HMDA data for Escambia County has revealed that credit history (African-Americans) and unverifiable information(Hispanics) are the two primary reasons for mortgage loan denials for these groups.	Residents to be better prepared when applying for mortgage loans.	Consortium staff should consult with lenders and discuss whether there are steps that can be taken to prepare and/or assist applicants with these issues.	Escambia Consortium	2013	Staff time.	2013		

ANALYSIS OF IMPEDIMENTS - SUMMARY MATRIX

The Escambia-Pensacola Human Relations Commission web site, containing fair housing information, is only in English.	Better information availability for Spanish-speaking residents.	The Commission should be asked to add information in Spanish, even if just a reference to HUD's Spanish language information.	Escambia-Pensacola Human Relations Commission	2014	Staff time.	2014		
Fair housing complaints are predominantly disability-related.	Increased awareness of the Fair Housing Act as it relates to disability and reasonable accommodation.	The Pensacola Association of Realtors and the Human Relations Commission should be asked to provide increased emphasis on this subject in their trainings. In addition, since both Santa Rosa and Escambia are home to military bases, the poster showing a disabled veteran (should be distributed.	Escambia Consortium, Pensacola Assn. of Realtors, and the E-P Human Relations Commission.	2013	Staff time.	2013		
Fair housing surveys have provided interesting results.	Coordination of agency efforts.	Preparers of the surveys should meet to compare results and determine what patterns and/or consistent information have been reflected in the surveys. Discussions should include ideas for addressing the patterns.	Staff from Escambia Consortium and Escambia-Pensacola Human Relations Commission	2013	Staff time.	2013		
The real estate sections of the online version of the Pensacola News-Journal, the newspaper of general circulation, does not contain the fair housing logo or any narrative concerning fair housing.	Visible commitment to fair housing by the newspaper and advertisers.	The online versions should contain the same important information as the print versions. The <i>Journal</i> should be requested to provide the fair housing logo and information about fair housing.	Escambia Consortium	2012	Staff time.	2012		

Appendix

Signature Page: Escambia County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Escambia Consortium is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and the HOME Investment Partnerships Program.

The tenets of this Analysis of Impediments to Fair Housing will be carried forward by the Escambia Consortium in the continuing implementation of the Consolidated Plan.

Escambia County, Florida

Charles R. Oliver 8/10/12

Charles R. "Randy" Oliver
County Administrator

WITNESSES:

Susan Hendrix
Susan Hendrix

Print Name:

Deb Aementi
Deb Aementi

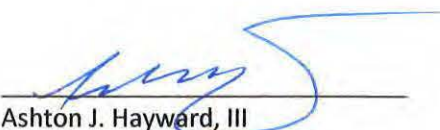
Print Name:

Signature Page: City of Pensacola

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Escambia Consortium is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and the HOME Investment Partnerships Program.


The tenets of this Analysis of Impediments to Fair Housing will be carried forward by the Escambia Consortium in the continuing implementation of the Consolidated Plan.

City of Pensacola, Florida



Ashton J. Hayward, III
Mayor

Attest:



Ericka L. Burnett
City Clerk

Signature Page: Santa Rosa County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Escambia Consortium is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program and the HOME Investment Partnerships Program.

The tenets of this Analysis of Impediments to Fair Housing will be carried forward by the Escambia Consortium in the continuing implementation of the Consolidated Plan.

Santa Rosa County, Florida



Jim Williamson, Chair
Board of County Commissioners



Mary M. Johnson
Clerk of the Court

Fair Housing Complaints involving properties in Escambia County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 71

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
040903958	2009H0091	12/19/08	Disability,	510 Failure to make reasonable accommodation	No cause determination		Pensacola
040905418	2009H0132	01/23/09	Sex, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
	2009H0132		Sex, Disability,	450 Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination		
040906698	2009H0170	02/20/09	Race,	310 Discriminatory refusal to rent	No cause determination		
040908268	2009H0207	03/19/09	Race,	330 False denial or representation of availability	No cause determination		
	2009H0207		Race,	380 Discriminatory terms, conditions, privileges, or services and facilities	No cause determination		
040908818	2009H0217	04/03/09	Race, Sex, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
040909378	2009H0229	04/14/09	Disability,	382 Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant		
	2009H0229		Disability,	510 Failure to make reasonable accommodation	Unable to locate complainant		
040912118	2009H0281	06/18/09	Disability, Religion,	510 Failure to make reasonable accommodation	No cause determination		
040912188	2009H0282	06/19/09	Race,	310 Discriminatory refusal to rent	No cause determination		
040913458	2010H0023	07/21/09	Disability,	382 Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	500	
	2010H0023		Disability,	510 Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	500	

Fair Housing Complaints involving properties in Escambia County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 71

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
040914708	2009H0260	07/10/09	Race,	332 False denial or representation of availability - rental	Dismissed for lack of jurisdiction		Pensacola
	2009H0260		Race,	382 Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction		
	2009H0260		Race,	310 Discriminatory refusal to rent	Dismissed for lack of jurisdiction		
041001848	2010H0130	11/09/09	Race, Family Status,	443 Adverse action against an employee	No cause determination		
	2010H0130		Race, Family Status,	450 Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination		
041002778	2010H0154	12/03/09	Race, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	2000	
041004528	2010H0192	01/21/10	Sex,	380 Discriminatory terms, conditions, privileges, or services and facilities	Complainant failed to cooperate		
041005638	2010H0220	02/11/10	Family Status,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
041005788		02/17/10	Sex, Harassment, Disability, Sex, Harassment, Disability, Sex, Harassment, Disability, Sex, Harassment, Disability,	382 Discrimination in terms/conditions/privileges relating to rental 320 Discriminatory advertising, statements and notices 450 Discriminatory acts under Section 818 (coercion, Etc.) 480 Discriminatory acts under Section 901 (criminal)	No cause determination No cause determination No cause determination No cause determination		
041006728	2010H0242	03/10/10	Race,	300 Discriminatory refusal to sell	No cause determination		

Fair Housing Complaints involving properties in Escambia County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 71

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
041007438	2010H0249	03/23/10	Sex, National Origin, Other Origin, -Salvadoran,	302 Discriminatory refusal to sell and negotiate for sale	Complainant failed to cooperate		Pensacola
	2010H0249		Sex, National Origin, Other Origin, -Salvadoran,	381 Discrimination in terms/conditions/privileges relating to sale	Complainant failed to cooperate		
	2010H0249		Sex, National Origin, Other Origin, -Salvadoran,	382 Discrimination in terms/conditions/privileges relating to rental	Complainant failed to cooperate		
	2010H0249		Sex, National Origin, Other Origin, -Salvadoran,	300 Discriminatory refusal to sell	Complainant failed to cooperate		
	2010H0249		Sex, National Origin, Other Origin, -Salvadoran,	320 Discriminatory advertising, statements and notices	Complainant failed to cooperate		
	2010H0249		Sex, National Origin, Other Origin, -Salvadoran,	430 Otherwise deny or make housing available	Complainant failed to cooperate		
041007568	2010H0255	03/26/10	Race, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
	2010H0255		Race, Disability,	310 Discriminatory refusal to rent	No cause determination		
	2010H0255		Race, Disability,	320 Discriminatory advertising, statements and notices	No cause determination		
	2010H0255		Race, Disability,	430 Otherwise deny or make housing available	No cause determination		
	2010H0255		Race, Disability,	500 Failure to permit reasonable modification	No cause determination		
041008958	2010H0284	04/27/10	Race, Sex, Disability,	450 Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination		
041009588	2010H0326	05/12/10	Race, Disability,	320 Discriminatory advertising, statements and notices	No cause determination		
	2010H0326		Race, Disability,	380 Discriminatory terms, conditions, privileges, or services and facilities	No cause determination		

Fair Housing Complaints involving properties in Escambia County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 71

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
041010408	2010H0362	05/25/10	Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		Pensacola
041010468	2010H0367	05/26/10	Other Origin, -Hungarian, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
041010568	2010H0368	05/27/10	Race,	350 Discriminatory financing (includes real estate transactions)	Complaint withdrawn by complainant after resolution	15000	
	2010H0368		Race,	440 Other discriminatory acts	Complaint withdrawn by complainant after resolution	15000	
041015048	2011H0036	08/06/10	Other Origin, -Iranian, Religion,	381 Discrimination in terms/conditions/privileges relating to sale	No cause determination		
	2011H0036		Other Origin, -Iranian, Religion,	300 Discriminatory refusal to sell	No cause determination		
041015808	2011H0055	08/18/10	Race, Disability, Religion,	312 Discriminatory refusal to rent and negotiate for rental	Complainant failed to cooperate		
	2011H0055		Race, Disability, Religion,	332 False denial or representation of availability - rental	Complainant failed to cooperate		
	2011H0055		Race, Disability, Religion,	410 Steering	Complainant failed to cooperate		
	2011H0055		Race, Disability, Religion,	510 Failure to make reasonable accommodation	Complainant failed to cooperate		
041017058	2011H0085	09/13/10	Race,	332 False denial or representation of availability - rental	No cause determination		
	2011H0085		Race,	410 Steering	No cause determination		

Fair Housing Complaints involving properties in Escambia County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 71

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
041017228	2011H0089	09/14/10	Other Origin, -Arab,	381 Discrimination in terms/conditions/privileges relating to sale	No cause determination		Pensacola
	2011H0089		Other Origin, -Arab,	450 Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination		
041017798	2011H0106	09/28/10	Disability,	510 Failure to make reasonable accommodation	No cause determination		
041100508	2011H0101	10/15/10	Disability,	510 Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution		
041100998	2011H0141	10/21/10	Race,	382 Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant		
041101268	2011H0145	10/26/10	Race,	382 Discrimination in terms/conditions/privileges relating to rental	Complainant failed to cooperate		
	2011H0145		Race,	310 Discriminatory refusal to rent	Complainant failed to cooperate		
	2011H0145		Race,	430 Otherwise deny or make housing available	Complainant failed to cooperate		
040801818	27-92344H	11/20/07	Race, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	FHAP judicial dismissal		Tallahassee
	27-92344H		Race, Disability,	510 Failure to make reasonable accommodation	FHAP judicial dismissal		

Fair Housing Complaints involving properties in Santa Rosa County, FL 1/1/2005 thru 12/31/2010

INVESTIGATIONS involving properties = 11

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
040609378	26-91916H	06/19/06	Disability,	310 Discriminatory refusal to rent	No cause determination		Gulf Breeze
	26-91916H		Disability,	380 Discriminatory terms, conditions, privileges, or services and facilities	No cause determination		
040802558	27-92363H	12/12/07	Race,	312 Discriminatory refusal to rent and negotiate for rental	No cause determination		
	27-92363H		Race,	330 False denial or representation of availability	No cause determination		Milton
040814408	28-92738H	08/04/08	Disability,	510 Failure to make reasonable accommodation	FHAP judicial consent order		
040702198	26-92054H	11/16/06	Race,	450 Discriminatory acts under Section 818 (coercion, Etc.)	FHAP judicial dismissal		
040809088		05/13/08	Disability,	382 Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	600	
			Disability,	510 Failure to make reasonable accommodation	Conciliation/settlement successful	600	
040816868	29-92787H	09/18/08	Disability,	510 Failure to make reasonable accommodation	Conciliation/settlement successful		
040905428	2009H0133	01/23/09	Race, Sex, Color, Disability,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		
040915178	2010H0060	08/26/09	Race, Sex,	332 False denial or representation of availability - rental	Complaint withdrawn by complainant without resolution		
	2010H0060		Race, Sex,	382 Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution		Navarre
040915068	2010H0038	08/25/09	Race, Sex,	380 Discriminatory terms, conditions, privileges, or services and facilities	No cause determination		

Fair Housing Complaints involving properties in Santa Rosa County, FL 1/1/2005 thru 12/31/2010**INVESTIGATIONS involving properties = 11**

HUD Case Number	FHAP Case Number, if applicable	HUD FILING DATE	Basis	Issue Code Description	Disposition of Closed Cases, if applicable	Compensation	City
040612858	26-91996H	08/29/06	Race,	382 Discrimination in terms/conditions/privileges relating to rental	No cause determination		Pace
041017748	2011H0105	09/27/10	Family Status,	310 Discriminatory refusal to rent	No cause determination		

News Release



News Release

Santa Rosa County Public Information ■ 4499 Pine Forest Road ■ Milton, Florida ■ 32583 ■ (850) 983-5254

March 26, 2012
#120326-FRHSWK

Contact: Joy Tsubooka
Public Information Officer
(850) 983-5254, (850) 393-8304 Cell
joyt@santarosa.fl.gov

Santa Rosa County Fair Housing Week

The United States Department of Housing and Urban Development's office of Fair Housing and Equal Opportunity has marked the month of April as Fair Housing Month, and a time to celebrate the achievements of the Fair Housing Act. This year's theme is "Creating Equal Opportunity in Every Community." In celebration of the anniversary of the Fair Housing Act, the board of county commissioners will designate the week of Apr. 9 as Fair Housing Week in Santa Rosa County.

To help educate residents of their rights, the Santa Rosa County Housing Program will display fair and equal housing information Apr. 9 through 23 at their office located at 6051 Old Bagdad Highway, Suite 201 in Milton. Information will be available about the law and how to file a complaint if you think you are a victim of housing discrimination. For more information contact the housing program office at (850) 981-7076.

The United States Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity has marked the month of April as Fair Housing Month as a time to celebrate the achievements of the Fair Housing Act. The Fair Housing Act enacted on April 11, 1968 makes discriminatory housing practices such as denying renting or qualifying for a home loan based on race, gender, nationality, religion, family status or disability- illegal.

###

PART IV.

As part of this planning process, the Escambia Consortium must also analyze factors that limit fair housing choices. Your own experiences will contribute to the efforts to research obstacles, such as the nature and extent of housing discrimination in the City/Escambia County.

This information will be used to assist in developing strategies to overcome impediments to fair housing choice. This survey is for information gathering purposes only.

1. Do you believe discrimination is an issue in your neighborhood? ☐ Yes ☐ No
2. Have you ever experienced discrimination in housing? ☐ Yes ☐ No
(If yes, proceed to question 3, 4, and 5)
3. Who do you believe discriminated against you?
☐ Landlord/Property Manager ☐ Real Estate Agent
☐ Mortgage Lender ☐ Mortgage Insurer
4. On what basis do you believe you were discriminated against?
☐ Race ☐ Color ☐ National Origin ☐ Religion
☐ Gender ☐ Disability (either you or someone close to you)
☐ Familial Status (single-parent with children, family with children, or expecting a child)
5. If you believe you have been discriminated against, have you reported the incident?
If not, why?
☐ Do not know where to report ☐ Afraid of retaliation
☐ Do not believe it makes a difference ☐ Too much trouble
6. Please tell us about yourself by checking as many as apply:
☐ Business Owner ☐ Work in Pensacola City limits ☐ Work in Escambia County
(outside City limits)
☐ Homeowner ☐ Person with a disability ☐ Renter ☐ Other _____
☐ Landlord ☐ Non-Profit Organization ☐ Faith Based Organization

If you feel you have been discriminated against, please contact the Escambia-Pensacola Human Relations Commission or Northwest Florida Legal Services, Inc.

Thank you for your assistance!

Escambia - Pensacola Consortium 2010 Consolidated Plan Survey

Part I						
	City	County	Did not check City or County	Total		
Residence	42	67	21	130		
Part IV						
Fair Housing						
	Yes	No	N/A	Total		
1) Do you believe discrimination is an issue in your neighborhood	31	88	11	130	11 of the 130 surveys received did not have Part IV, Fair Housing, completed.	
2) Have you ever experienced discrimination in housing	22	97	11	130		
Most of the surveys received did not have all categories completed. The following is a compilation of those questions that were answered.						
If #2 yes	Landlord Property Manager	Real Estate Agent	Mortgage Lender	Mortgage Insurer		
3) Who do you believed discriminated against you	19	9	1	4		
if #2 yes	Race or Color	Gender	Family Status	Religion	Disability either you or someone close to you	National Origin
4) On what basis do you believe you have been discriminated against.	20	3	11	2	3	1
if #2 yes	Do not know where to report	Do not believe it makes a difference	Afraid of Retaliation	Too much trouble		
5) If you believe you have been discriminated against, have you reported the incident? If not why?	8	10	3	8		
6) Demographics	Business Owner	Landlord	Renter	Person with Disability	Non-Profit Organ.	Faith Based Organ.
	1		46	14	3	4
				Work in P'cola City Limits	Work in Escambia County (outside City Limits)	Other
				7	15	7

Escambia County/Pensacola Fair Housing Survey

Escambia County and the City of Pensacola are jointly conducting a survey to evaluate Fair Housing conditions in the area. The survey is being conducted anonymously, so do not write your name on the survey form and please be honest and complete in your answers. Responses will be summarized and individual responses will not be reported in any way.

The following questions will address specific fair housing issues.

Fair Housing is a right protected by Federal and State laws. Each person is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, source of income, or any other arbitrary reason. Fair Housing laws apply to rental housing, homes for sale, advertising, home loans, and home insurance.

Signs of discrimination include:

- The rent or deposit quoted is higher than advertised.
- The manager says the unit is rented but the ad or sign is still posted.
- The manager says "You probably won't like it here", "We've rented out the family units", or "There is no place for your children to play".
- A real estate agent keeps "steering" you to look for houses in neighborhoods different than the ones you desire and you think you can afford.
- The manager denies your request to make minor modifications to your unit to accommodate your disability.
- The manager refuses to make repairs to your unit or harasses you or your children – but doesn't do this to other tenants who are a different race or ethnicity than you.

1. Do you believe housing discrimination is an issue where you live?

☐ YES ☐ NO

2. Have you ever experienced housing discrimination

☐ YES ☐ NO ☐ NOT SURE

If "NO", please skip ahead to question #9.

3. Who do you believe discriminated against you?

- ☐ A landlord / property manager
☐ A mortgage lender
☐ A government housing program staff person

- ☐ A real estate agent
☐ A mortgage insurer
☐ Other: _____

4. On what type of property or situation did the act of discrimination occur?

- ☐ An apartment complex ☐ A condo development
☐ A single-family neighborhood ☐ A public or subsidized housing project
☐ A trailer or mobile home park ☐ When applying for a government program

5. On what basis do you believe you were discriminated against? (check all that apply)

- | | | |
|--|---|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Color | <input type="checkbox"/> Religion |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Ancestry | <input type="checkbox"/> Gender |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Age |
| <input type="checkbox"/> Family Status (e.g. single-parent with children, family with children or expecting a child) | <input type="checkbox"/> Source of Income (e.g. welfare, unemployment, disability, social security) | <input type="checkbox"/> Disability (e.g. either you or someone living with you) |

☐ Other (please explain): _____

6. How were you discriminated against?

7. Have you ever been denied flexibility ("reasonable accommodation") in the rules, policies, or practices at your residence that you need because of a disability (for example, permission to install grab bars, ramps, etc.)?

☐ YES ☐ NO

If "YES", what was your request?

8. If you believe you have been discriminated against, have you reported the incident?

☐ YES ☐ NO

If "NO" - Why not?

☐ Don't know where to report ☐ Afraid of retaliation

☐ Don't believe it makes any difference ☐ Too much trouble

☐ Other: _____

9. Are you aware of any hate crimes that have been committed in your neighborhood in the last five years? (A hate crime is a crime, including intimidation or harassment, against a person on their Property motivated by hostility toward their real or perceived attributes.)

☐ YES ☐ NO

If "YES", what was the basis of the crime? (check all that apply)

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Religion
<input type="checkbox"/> National Origin	<input type="checkbox"/> Ancestry	<input type="checkbox"/> Gender
<input type="checkbox"/> Marital Status	<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> Age
<input type="checkbox"/> Family Status	<input type="checkbox"/> Source of Income	<input type="checkbox"/> Disability
<input type="checkbox"/> Other (please explain): _____		

THE FOLLOWING INFORMATION WILL BE USED FOR REPORTING PURPOSES ONLY

10. What is your household's yearly income?

<input type="checkbox"/> Less than \$15,000	<input type="checkbox"/> \$50,000-\$74,999
<input type="checkbox"/> \$15,000-\$29,999	<input type="checkbox"/> \$75,000-\$99,999
<input type="checkbox"/> \$30,000-\$49,999	<input type="checkbox"/> Greater than \$100,000

11. Are you Hispanic or Latino? ☐ YES ☐ NO

12. What is your race? (If you are multi-racial, please check all that apply)

<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Native Hawaiian or Other Pacific Islander
<input type="checkbox"/> Asian	<input type="checkbox"/> White
<input type="checkbox"/> Black or African American	<input type="checkbox"/> Native American

13. Do you speak a language other than English in your home? ☐ YES ☐ NO

14. What is the highest level of education you have completed?

- | | |
|---|---|
| <input type="checkbox"/> Less than High School | <input type="checkbox"/> 4-year College Degree (BA, BS) |
| <input type="checkbox"/> High School / GED | <input type="checkbox"/> Master's Degree |
| <input type="checkbox"/> Some College | <input type="checkbox"/> Doctoral Degree |
| <input type="checkbox"/> 2-year College Degree (Associates) | <input type="checkbox"/> Professional Degree (MD, JD) |

15. Are you employed? ☐ YES ☐ NO

If "YES":

- 1) What is your main form of transportation to work? (e.g. car, bus or other form public transportation, walk, bike, carpool) _____
- 2) On average, how long is your commute to work each day (round trip)?
 - ☐ 0-15 minutes
 - ☐ 16-20 minutes
 - ☐ 30 minutes or more

16. Are you disabled? ☐ YES ☐ NO

Do you receive money from the government because of your disability? ☐ YES ☐ NO

17. ☐ Male ☐ Female Age: _____ Zip Code: _____

Male

18. If you live in a named subdivision, rental property, apartment complex, mobile home park, etc., please provide the name: _____

19. How many people are in your household? _____

This survey is being administered by:

Escambia-Pensacola Human Relations Commission
 2257 North Baylen Street
 Pensacola, Florida 32501
 Phone: 850 437-0510

For additional information about your fair housing rights, please call

Escambia-Pensacola Human Relations Commission at 850 437-0510

The HUD Fair Housing Office at 1-800-669-9777, or visit www.hud.gov.





TAI SERVED
HIS COUNTRY
AND FOUGHT
FOR FREEDOM.

SHOULDN'T HE BE
FREE TO CHOOSE
WHERE HE LIVES?

Visit

www.hud.gov/fairhousing

or call the HUD Hotline

1-800-669-9777 (voice)

1-800-927-9275 (TTY)

HOUSING DISCRIMINATION IS ILLEGAL

If you're looking for an apartment and you can't get in – because of barriers like steps, steep slopes and lack of curb cuts – or if you find the kitchen or bathroom is not accessible, please call. The Fair Housing Act requires most multi-family dwellings built since March 13, 1991, to be accessible to people with disabilities.

We will investigate to make sure the building complies with federal law.



A public service message from the U.S. Department of Housing and Urban Development in partnership with the National Fair Housing Alliance. The federal Fair Housing Act prohibits discrimination because of race, color, religion, national origin, sex, family status or disability. For more information, visit www.hud.gov/fairhousing.

NFHA
National Fair Housing Alliance

XFINITY Connect

eswfp@comcast.net

± Font Size ±

Analysis of Impediments to Fair Housing in Escambia-Santa Rosa

From : Mia Adams <mia@lsnf.org>

Thu, Jun 07, 2012 06:01 PM

Subject : Analysis of Impediments to Fair Housing in Escambia-Santa Rosa

To : Mia Adams <mia@lsnf.org>, eswfp@comcast.net

Hi Ms. Wright –

As I mentioned during my call to you, Legal Services of North Florida (LSNF) was selected as a U.S. Dept. of HUD Education and Outreach Fair Housing Education and Outreach Program (FHIP) starting in 2006. I started working at LSNF in September 2007, serving as the FHIP project's coordinator until our grant ended around February 2010.

As a FHIP, our project educated citizens in our service area about the Fair Housing Act (FHA) and housing discrimination by providing education workshops for the community, and trainings for housing providers and service providers. We also produced Fair Housing Complaints articulating the discrimination a client received and followed up on the referral and review process of the U.S. Department of HUD or sister agency. The complaints came in all categories, but primarily the issues focused on disability discrimination, requests for accommodations and modifications, Familial Status, and race and gender complaints.

At the time when our office held a FHIP Education and Outreach Grant, we received a great deal of support from our community. The Pensacola Housing Authority, Neighborhood Enterprises II, CEII, Movement for Change, Escambia Pensacola Human Relations Commission (EPHRC), Pensacola Association of Realtors (PAR), Milton Housing Authority, the courts, the Escambia Santa Rosa Bar Association, Catholic Charities, United Way of Santa Rosa, United Ways of Escambia, United Ministries, Loaves and Fishes, Homeless Coalition, Interagency Community Council, Families Count, Families First, Department of Children and Families, Escambia Co. Schools, Early Learning Coalition, Santa Rosa County Schools, Head Start, libraries, and *many* other local community and faith based agencies, supported our project and gave our office client referrals. However, because of the lack of funding our urban and rural population is not being reached to educate them on their rights, so our community is lacking educational outreach and access to services on many levels and is currently greatly underserved.

While our resources are less, we continue to support the needs of the community in any way we can. We have maintained our relationship with PAR and continue to support their Annual Legal Update. Last October an attorney and executive director of a partner agency of LSNF in Tallahassee, North Florida Center for Equal Justice (NFCEJ), provided the Legal Update to the PAR. Other agencies and organizations that we have worked with continue to refer clients with legal needs to our office and we serve the clients as best we can.

Unfortunately when we lost funding for our FHIP grant, we lost the resources to be able to reach out and educate the community about the FHA with the same level of intensity. Unfortunately many programs in our area are experiencing difficulty meeting the FHA needs of our community due to limited funding. Not only has our office lost funding, but EPHRC is also underfunded to address these issues, although they are the agency selected by our local government to deal with local issues. We know that the city and county are well meaning to support the needs of the community to ensure they are housed fairly and treated fairly but lack of funding has made this a challenge.

Some of the 'Impediments' we are still seeing focus around lack of funds and lack of information getting to the community about legal rights and process. Escambia/Pensacola has no Public Housing Authority like many of the communities around Florida do. We think this may contribute to confusion in our community about who they can go to for assistance. There is a lack of knowledge in our public housing community about grievance rights, the legal process and rights. These communities are also in great need of resident/tenant organizing. For example, there is a public housing community in Pensacola called Oakwood Terrace. One issue that the community faces is the barbed wire on top of the gate and the impact it has on the tenants. Some agencies have contacted our office with concerns, and we have begun a small working group of professionals trying to reach the tenants to come up with solutions. Although this is not race discrimination per se, due to the nature of the population (minorities, disabled) it impedes on a protected class.

We need greater access to information and better connections within the community to serve the needs that already exist.

For instance, we see women disparately impacted by males on public property effecting the stability of housing, by coming to the housing unit generally occupied by a young woman and child, and taking advantage of the opportunity. Due to violence or other crimes, the housing is jeopardized and the tenant is threatened with eviction. Also, we see many legally insufficient eviction notices, and due to lack of information improper evictions may be granted.

To intensify matters, the eviction process has a disparate impact on some protected populations. Because there is very little case management to intervene, educate, and maintain safe and fair housing, we see housing providers using the eviction process as the only

remedy, rather than utilizing case management and community intervention and support. Also, the way the system is locally, housing providers are able to take advantage of uneducated citizens in the judicial process. As stated above, when a client has an issue with the condition of a housing unit, the rent withholding process must be followed very specifically to provide a defense. However, when clients do not know about the process, the landlord will give them an eviction notice, and the court will require any past due rent they find is owed to be placed in the court registry before any hearing about the eviction defense can be heard. Oftentimes, the court, unaware, will require improper amounts be deposited into the court registry.

Additionally, many subsidized housing units are on a indefinite waitlist because of lack of funding. (Also, last year many fell into a situation where uncertainty of the national budget created a gap in funds causing some to lose their section 8 voucher housing.)

The lack of information and funding to provide education and outreach has created unjust outcomes that disparately impact families and individuals in our protected classes.

We have also done work with the Vet and Homeless population and have noticed that changes in past year regarding panhandling have forced many of the homeless into woods. Our community is in great need of more connected services and shelters to serve this population.

Since 2010, although we have not had our education and outreach FHIP grant, we still assist clients with our available resources. We still continue to address Fair Housing Issues and advise client's about the complaint process and their rights in landlord/tenant cases and Foreclosure cases. We assist clients in legal matters such as using the FHA as a defense in a housing lawsuit, or making a request for a reasonable accommodation on behalf a client. Since our FHIP grant has ended, despite our resources being limited, we have continued to advise and assist client's in several cases. On average we have many client's come in to our office every month with facts and questions about their rights in housing and whether they have been victims of housing discrimination.

I am sorry this is rough. I put together the information together as quickly as a could. I am sure I left something out, but I want to get this information to you. I hope you find it helpful!! If you have any questions, please let me know.

Thanks,

Mia Adams
Attorney
Legal Services of North Florida

Errata

The Escambia Consortium would like to include the following corrections/explanations to statements included in the email from Legal Services of North Florida included in the Addendum to the Analysis of Impediments to Fair Housing:

Statement 1: *“There is no PHA in Escambia/Pensacola”*

Response: Escambia County has two Public Housing Authorities (PHA): the Area Housing Commission, which administers public housing and the City of Pensacola Housing Office, which administers the Section 8 program. Additionally, the Milton Housing Authority is another local PHA in Santa Rosa County.

Statement 2: *“...there is a public housing community called Oakwood Terrace.”*

Response: Oakwood Terrace is not public housing, but rather, a privately owned, HUD project-based, rental complex.

Statement 3: *“Also, we see many legally insufficient eviction notices, and due to lack of information [sic] improper evictions may be granted.”*

Response: It should be clarified that these “improper evictions” do not solely refer to Public Housing or Section 8 units. While there may be occurrences of improper evictions in Public Housing or Section 8 Voucher Housing given that unit counts are in the thousands, the Consortium feels that the vast majority of the situations probably center on privately owned rentals. An “improper eviction” may also be noted in Public Housing, Section 8 or other HUD assisted housing when a lease is terminated due to illegal drug use or criminal activities from a household member as there are federal guidelines that PHA’s must follow when certain criminal activities occur.