



# Analysis of Impediments to Fair Housing Choice

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Submitted to:  
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U.S. Department of Housing and Urban Development

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**Collier County**  
**Analysis of Impediments to Fair Housing Choice**

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**COLLIER COUNTY  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**EXECUTIVE SUMMARY**

**Background**

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), Collier County is required to conduct an analysis to determine if any impediments exist that might prevent the nation's fair housing laws from being observed. The County conducted its last Analysis of Impediments in 2005.

The Civil Rights Act of 1968 and the Fair Housing Amendments Act of 1988 are both designed to ensure that individuals of similar income levels in the same housing market have the same housing choices regardless of their race, color, religion, sex, handicap, familial status, or national origin.

**Purpose**

The purpose of this analysis is to examine a number of key policy areas to ensure that housing discrimination does not exist; including any public policies that may contribute to housing discrimination.

If the analysis finds any impediments, the County is required to take positive action to remove or address the impediments.

**Fair Housing Program**

- Collier County has a fair housing ordinance.
- The County Commission has officially declared April as fair housing month.
- The County holds an annual housing fair where fair housing brochures are made available.
- The County maintains fair housing posters and brochures at its housing office, and distributes fair housing pamphlets to its libraries, social service agencies and churches.

Collectively, these programs utilize a number of methods to keep the issue of fair housing in the public awareness and to make information about the Fair Housing Act easily accessible to the general public.

## Analysis of Impediments to Fair Housing – Collier County

### HUD Sanctions

There are no HUD sanctions against Collier County. There was a reduction in funding for the FY 2011 and FY 2012 entitlement years due to non-completion of the Cirrus Pointe project. This project was not initiated due to the economic recession and the withdrawal of the developer. Since funding was used in previous years for this project, a reduction has been made by HUD.

### Lawsuits

There are no fair housing lawsuits.

### Fair Housing Complaints

HUD's Regional Fair Housing office tracks the number of fair housing complaints received by HUD or by the State of Florida. The state, through its Human Rights Commission, receives funding as a Fair Housing Assistance Program (FHAP) to investigate fair housing complaints in Florida on HUD's behalf.

### Collier County Fair Housing Statistics Florida Commission on Human Relations

Housing Cases Received by Bases Filed				
	FY07-08	FY08-09	FY09-10	FY10-11*
<b>Total Cases Docketed</b>	8	4	14	4*
<b>Case Bases Filed**</b>				
Disability	3	2	10	3*
Race	2	1	4	
National Origin	2		1	
Familial Status	3		1	1*
Sex	2			1*
Retaliation				1*
Religion		1	2	
Color				

\*First half of the fiscal year: 7/1/2010-12/31/2010

\*\*Complainants may file multiple bases within the same case. As a result, there are often more bases than cases in a given year.

## Analysis of Impediments to Fair Housing – Collier County

Housing Cases Received by Closure Type				
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Reasonable Cause			3	1*
Conciliation Settlement	2			
Withdrawal w/ Benefits				
Withdrawal w/o Ben.				
No Jurisdiction				
Failure to Cooperate				

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As these tables display, the state received 14 fair housing complaints from Collier County in FY2009/2010 (the last full year that statistics are available). This figure is an increase from the previous years, although the numbers are not significant. Figures for the first half of FY 2011 show an annual rate estimated to be 8 complaints.

The complaints received concentrated primarily regarding disability, with race and familial status following. Cases based on race only made up 23.3% of all cases. The fact that 70% of complaints are concerned with disability could be due to the makeup of the County with such a high percentage of elderly households and multifamily developments. Lack of knowledge or understanding regarding the needs of disabled persons is another potential root cause.

The tables also illustrate that no systemic pattern of discrimination exists in the County. A total of 24 of the 30 complaints (80%) received a “No Cause Finding” which means that no discrimination was found through the investigation. In addition, another 2 cases reached a settlement prior to further action by the state. Therefore, in the past 3.5 years only 4 documented cases of discrimination existed in Collier County. Based on this data, it is determined that no wide-spread, systemic or patterned discrimination exists in the County.

As this table also illustrates the County received a relatively small number of complaints. This is in some measure a result of HUD’s continued public awareness and educational efforts in this area.

### Local

The County has not directly received any fair housing complaints during the last five years.

## **Analysis of Impediments to Fair Housing – Collier County**

### **Outreach and Community Input**

In order to obtain the widest possible input concerning impediments, two levels of outreach were conducted:

1. Public input
2. Agency interviews

### **Public Input**

The County seeks comments on fair housing at its annual HUD Community Development public hearings.

### **Agency Interviews**

Mr. Albert Batista, Esq. of Legal Aid reported that their office had not received any formal complaints about fair housing over the last year. Mr. Batista did indicate issues regarding tenant/property manager interaction which is discussed in the report.

### **Analysis**

- The County's minorities include a long-standing African-American community, a growing Hispanic population and emerging Haitian community.
- Minority homeownership rates lag behind statewide averages.
- The Florida Human Right Commission data did not reveal any patterns of racial discrimination.
- While the County had 4 fair housing complaints in the first half of FY2010, only 1 was determined to have cause.
- Issues regarding fair housing for the disabled do exist.
- Many of the County's lenders participate in the County's affordable housing programs.
- Minorities have a higher than average participation in the County's homeownership programs.
- Branch banks and insurance carriers are located across the County, although most are concentrated in the more populous and affluent western side.
- The Home Mortgage Disclosure Act information found no patterns of discrimination or red-lining.

The Analysis of Impediments to Fair Housing identified impediments in several areas:

### **Discrimination Based on Race/National Origin or Disability**

The County had 4 complaints in the first half of FY2011. The cases were primarily regarding disabled clients. This would seem to indicate that some landlords are not completely aware of fair housing laws, especially regarding the disabled and families with children.

## **Analysis of Impediments to Fair Housing – Collier County**

### **Tenant/Property Manager Relations**

A condition exists (primarily in Immokalee) where the tenants and the property managers speak different languages. Conflicts have arisen that have resulted in calls to the Sheriff's Department to resolve the issue. Some tenants feel pressured to leave the complex. Although no overt discrimination has been documented, the issue does provide an impediment to fair housing.

### **Transportation to Work**

Many of the lower income population of Collier County live in the far eastern portion of the County. The jobs available to this group exist primarily along the western coast of the county. Access to public transportation is limited. This issue has been addressed through the use of private transportation systems by employers to enable the workers to get to their jobs.

### **Land Use**

Provisions in the Land Development Regulations in Collier County make the construction of affordable housing difficult and offer a barrier. Although construction of new units is not currently a priority due to high vacancy rate, the issues these regulations addressed should be considered for long term planning purposes.

### **Unemployment**

Much of the housing issues relate to the lack of funds to pay for the units. Unemployment has risen significantly creating foreclosures and lack of ability to attain mortgages. Increased economic development and the resulting jobs will ameliorate this condition.

### **Actions to Correct/Identify Impediments**

The County will ensure that any fair housing complaints that are received are also forwarded to HUD for investigation. In addition, the County will take the following actions to raise public awareness on this issue.

1. Continue to enforce its fair housing ordinance.
2. Proclaim April of each year fair housing month and display fair housing posters in all public buildings.
3. Continue to print and distribute (in English/Spanish) fair housing bookmarkers in the County's libraries and to distribute fair housing pamphlets to its social service agencies and churches.



## **Analysis of Impediments to Fair Housing – Collier County**

4. Continue to provide HUD's fair housing complaint forms (in English/Spanish) at County offices.
5. Contact the Board of Realtors and the Apartment Managers' Association to volunteer to participate in fair housing training at their meetings, symposiums, and housing events.
6. Continue to provide fair housing information at the County's annual housing fair, and to seek comments regarding fair housing during the County's annual HUD public meeting cycle.
7. Continue to provide credit counseling for low-income potential homebuyers and targeting housing programs on low-income households.
8. Where applicable, require all affordable housing subrecipients to develop fair housing marketing plans.
9. Request that HUD provide the County with copies of its fair housing television commercials to run on the County's public access channel.
10. Request that HUD provide the County with brochures/ads warning about the dangers of predatory lending.
11. Request that HUD contact the local newspaper to request that they publish HUD's Publisher's Fair Housing Notice in the real estate section of the newspaper.
12. Encourage rental communities to provide translations of community rules for tenants to reduce confusion and tenant/property manager conflicts.
13. Distribute guidelines to property owners regarding the rights of the tenants.
14. Facilitate the establishment of a liaison position in the Sheriff's Office to reduce the tenant/property manager conflicts.
15. Institute a housing testing policy on a periodic basis to insure that all groups are treated fairly.
16. Encourage the revision of the Land Development Regulations to allow more affordable housing units to be constructed as required.
17. Encourage the continued practice of private transportation for workers from eastern Collier County to the jobs in the west.
18. Promote economic development to increase job creation.

## **Analysis of Impediments to Fair Housing – Collier County**

### **Financial Plan for Accomplishment**

The County will continue to set aside funds each year from its entitlement grant to fund fair housing activities on an annual basis.

### **Mechanism for Updates**

The Human, Housing and Veteran Services Department (HHVS) is the lead contact agency, and as such maintains up-to-date information on all changes of federal, state and local rules. This office will maintain and keep track of changes in legislation and any required applicable actions to ensure compliance with HUD goals and rules.

### **Commitment from Local Officials**

The Board of County Commissioners through both its proclamation and funding will provide evidence of its commitment to fair housing.

# **Analysis of Impediments to Fair Housing – Collier County**

## **COLLIER COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE RESEARCH, FINDINGS AND RECOMMENDATIONS**

### **INTRODUCTION**

#### **Background**

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#### **Purpose**

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If the analysis finds any impediments, the County is required to take positive action to remove or address the impediments.

#### **State Fair Housing Law**

Part II of Chapter 760 of the Florida Statutes outlines the state’s Fair Housing Act. This Act follows federal law and makes it unlawful to discriminate against any person in any aspect of the rental or sale of housing. This Act created a 12-member Commission on Human Relations and is staffed by the Department of Management Services. The Act established a written complaint process with timelines for the Commission to investigate and resolve such complaints; first through voluntary compliance, and then through civil and criminal sanctions.

#### **Fair Housing Ordinance**

Collier County adopted a fair housing ordinance in 1986 and amended it in 1992.

# Analysis of Impediments to Fair Housing – Collier County

## COMMUNITY PROFILE

The following information is drawn from sources such as the Shimberg Center, the American Community Survey, a program of the US Census Bureau, and from proprietary information from Claritas Inc., the nation’s largest information provider. Unfortunately, detailed information from the 2010 Census is not yet available.

### Population

- While County’s population has continued its growth, up 32.7% between 2000 and 2010 (88,100 new residents); this number is deceptive in that it does not reflect that the bulk of new residents arrived between 2004-2007 and the rate of increase has slow dramatically in the last years of the decade. The County is expected to add another 32,600 people through the year 2015.
- During the winter season, the County’s population increases by 25%, as wealthy residents visit their winter homes.
- The County is racially diversifying: 82.7% are white, 4.8% African-American and 26.9% are now Hispanic (who can be of any race).

Race	Collier County	US	Florida
White	82.7%	72.0%	74.9%
African-American	4.8%	12.5%	15.2%
Hispanic	26.9%	16.1%	21.5%
2010 Claritas			

- The County continues to have an older age structure: 41.5% of all households are headed by someone over 65. This figure represents an increase of 1.5% in senior heads of households from 2006.
- The County’s median family income (half above/half below) in 2011 is \$71,800, the highest in the State of Florida, however it is down from \$72,300 in 2010.
- Almost half of the County’s total personal income is received through investment income, twice the statewide rate. Affluent retirees/visitors are the County’s economic base.
- Collectively the County’s residents are highly affluent: 48% of all households had incomes above \$50,000 a year in 2000 and 60% in 2010.
- The Claritas Inc. proprietary demographic information found 24% of the County’s households were upper-middle income or higher, 50% were middle-class and 26% were working class. This compares to 2006 figures which showed 33% of the County’s households were upper-middle income or higher, 35% were middle-class and 32% were working class.
- Reflecting the County’s unique economy, employment is higher than average in agriculture, construction, retail sales, entertainment, accommodation and food service.
- Minority incomes lag. In 2000, the median income for white households was \$50,146, but only \$27,812 for African-Americans and \$35,941 for Hispanics.

## Analysis of Impediments to Fair Housing – Collier County

- Although minority groups have a higher level of Cost Burden than the non-minority population, the differences are within the acceptable limits based on HUD regulations.
- Renters have a higher level of Cost Burden than homeowners.
- Collectively, the County’s adult educational attainment levels are above the statewide rate; but minority education attainment levels lag well behind even their statewide rates.
- In 2010, 6.7% of the County’s residents have household incomes below the poverty line.
- The County’s low-income households can be divided into two groups:
  - There are 6,345 elderly families.
  - There are 10,012 working-poor families.

The following tables identify the Cost Burden based on ethnic distribution. In all categories, Renters have a more significant Cost Burden than Owners. Most non-white categories have a more severe Cost Burden than the average for the County.

Ethnic Group	Owner (75.7%)		Renter (24.3%)	
	Moderate Cost Burden	Severe Cost Burden	Moderate Cost Burden	Severe Cost Burden
White (79.4%)	17.9%	15.9%	24.2%	21.4%
Black (3.6%)	28.1%	22.5%	25.0%	37.6%
Hispanic (15.6%)	26.8%	30.8%	29.7%	25.6%
Other (1.4%)	19.9%	13.7%	4.6%	25.6%

Sources: Census Bureau CHAS

### Housing

- Reflecting its location on the Gulf of Mexico, and older age structure the County has a high level of multifamily condominium units (49%).
- The vast majority of the housing stock is new, built after 1980.
- Reflecting the County’s strong second-home market, 24% of all units were “held for seasonal use” in 2010.
- While the latest public data (Source: City-data.com) estimated median house or condo value in 2009 was \$292,100 (it was \$149,000 in 2000). In Florida, the estimated house or condo median value in 2009 was \$182,400 which is significantly lower than in the 2004-2007 boom period.
- In 2010, 76.6% of the County’s households were homeowners, well above Florida’s 70% rate. However, minority ownership rates lag behind statewide minority rates.

## Analysis of Impediments to Fair Housing – Collier County

Race	Ownership Rate		
	Collier	US	Florida
White	79%	71%	74%
African-American	33%	46%	50%
Hispanic	48%	46%	56%
County	76%	68%	70%
<i>Source: 2000 Census.</i>			

- The County’s Fair Market Rent, established by HUD for 2011 is as follows:  
 Efficiency     \$909  
 1 Bedroom     \$1,042  
 2 Bedroom     \$1,173  
 3 Bedroom     \$1,458  
 4 Bedroom     \$1,518  
 These levels reflect an approximate 1% decrease in fair market rents from 2010.
- A total of 34.4% percent of the County’s renters paid over 30% of their incomes for housing, 15.8% paid over 50%.
- The County’s working poor families (making below 50% of the median income) continue to have the trouble in the marketplace.

### Geographic Area

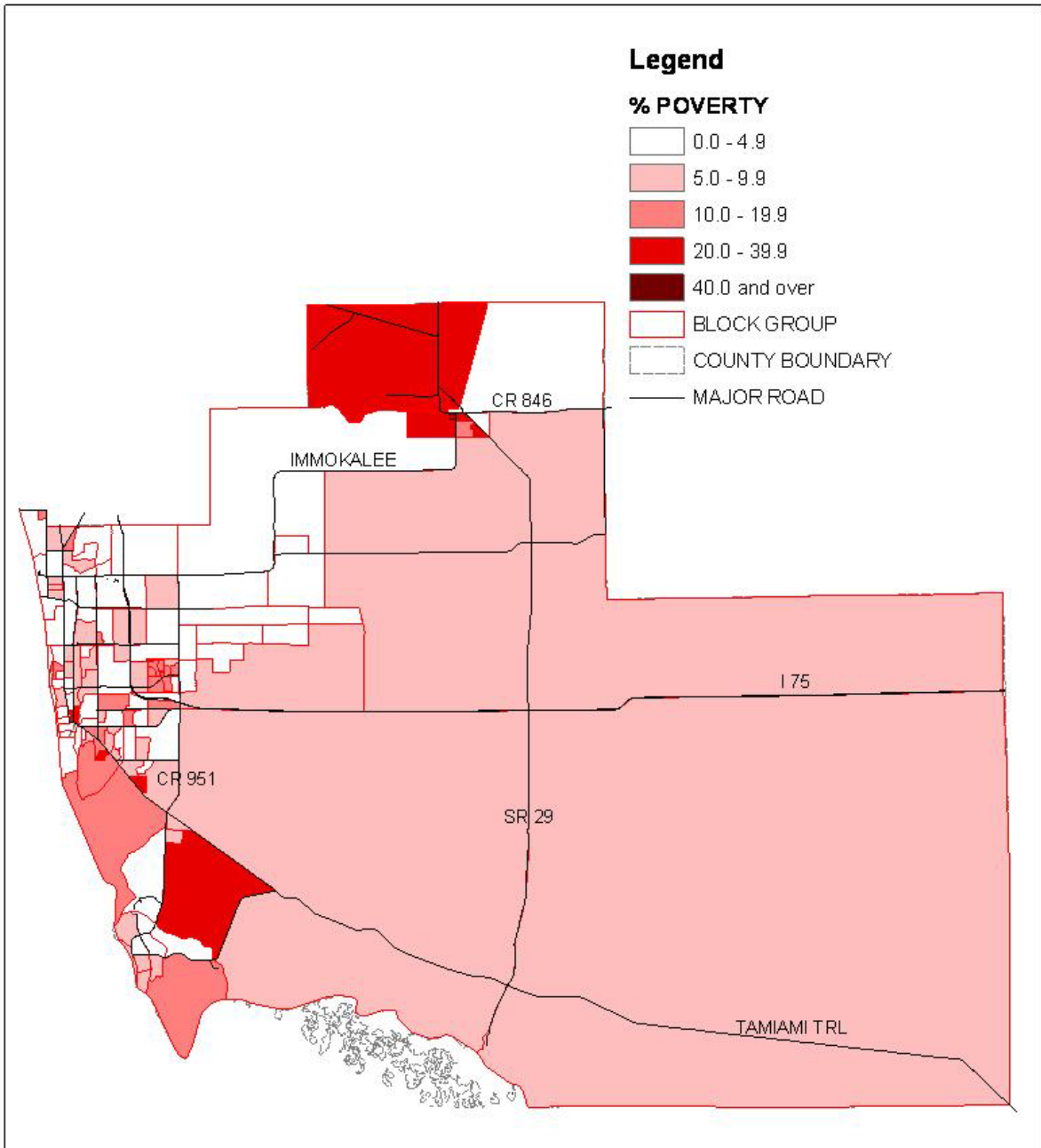
Collier County and two of its three incorporated cities, Naples and Marco Island, participate in these entitlement programs.

The maps depicting the special population groups are as follows:

- Exhibit 1 – Location Map of Population Below Poverty Line
  - The areas of the County with the highest percentages of households below the Poverty Line
- Exhibit 2 – Location Map of Black or African-American Population
  - The areas of the County with the highest percentages of Black or African American households
- Exhibit 3 – Location Map of Hispanic or Latino Population
  - The areas of the County with the highest percentages of Hispanic or Latino households
- Exhibit 4 – Location Map of Elderly Population
  - The areas of the County with the highest percentages of Elderly households

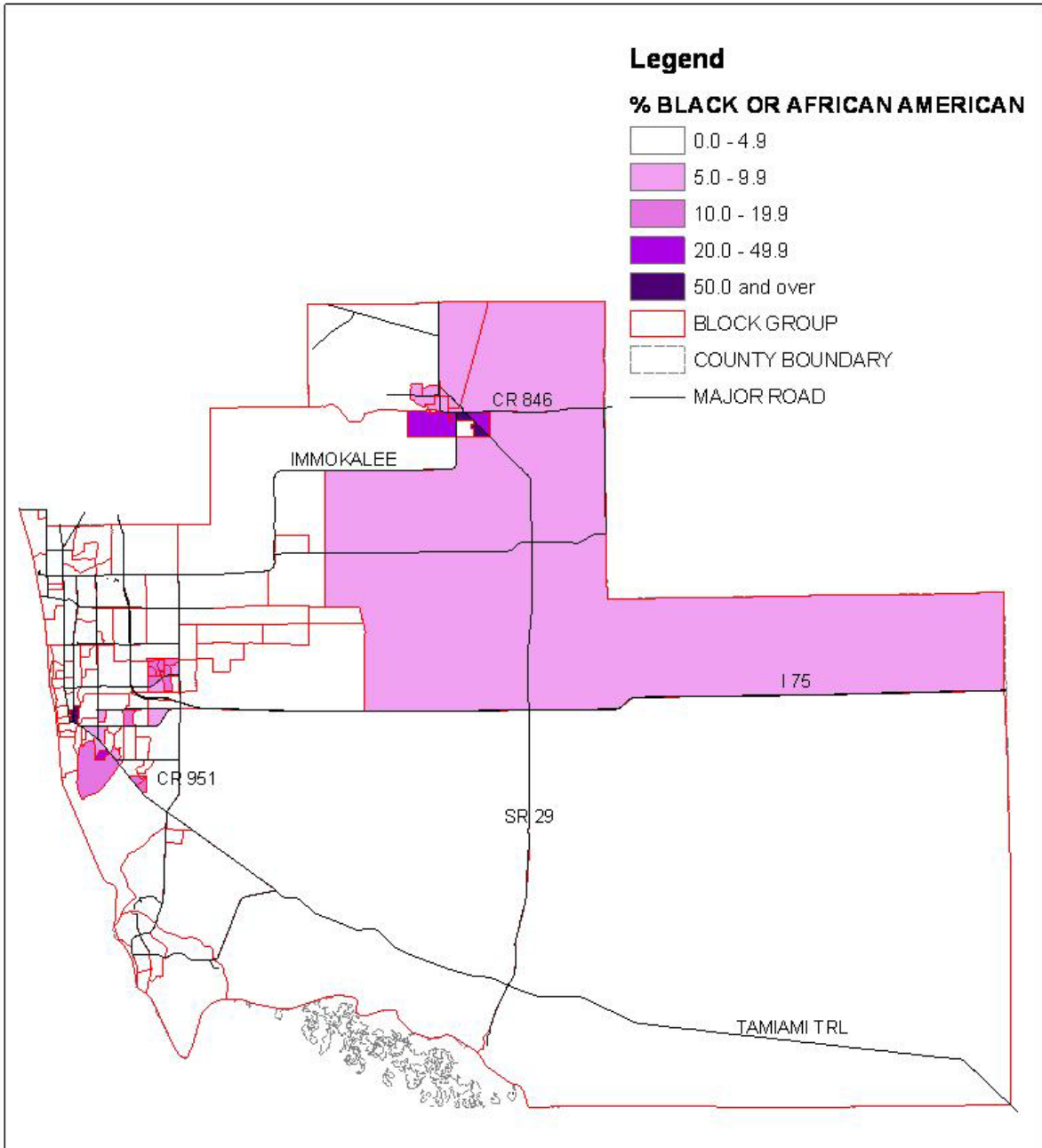
# Analysis of Impediments to Fair Housing – Collier County

## Exhibit 1 - Location Map of Population Below Poverty Line



# Analysis of Impediments to Fair Housing – Collier County

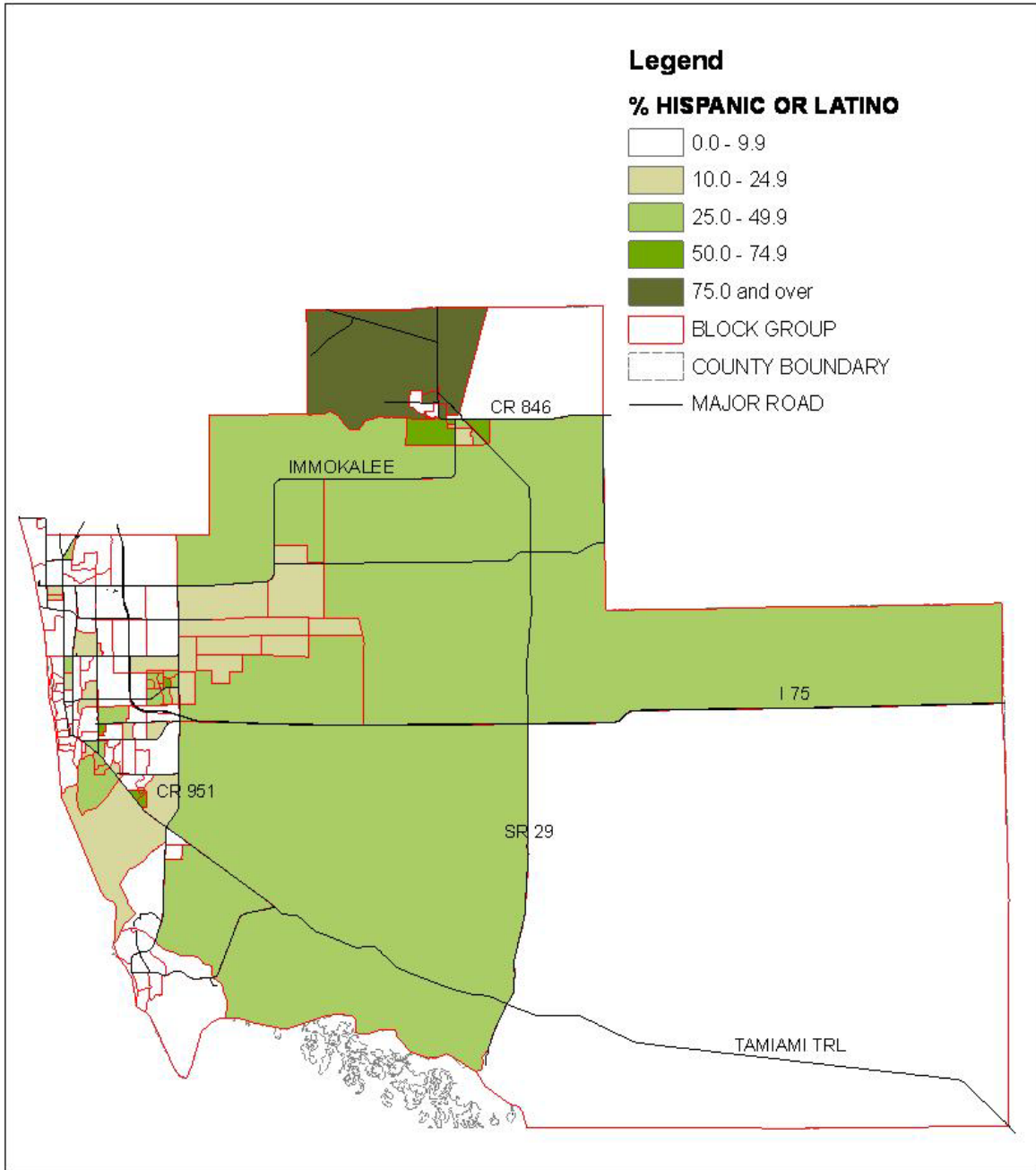
## Exhibit 2 – Location Map of Black or African-American Population





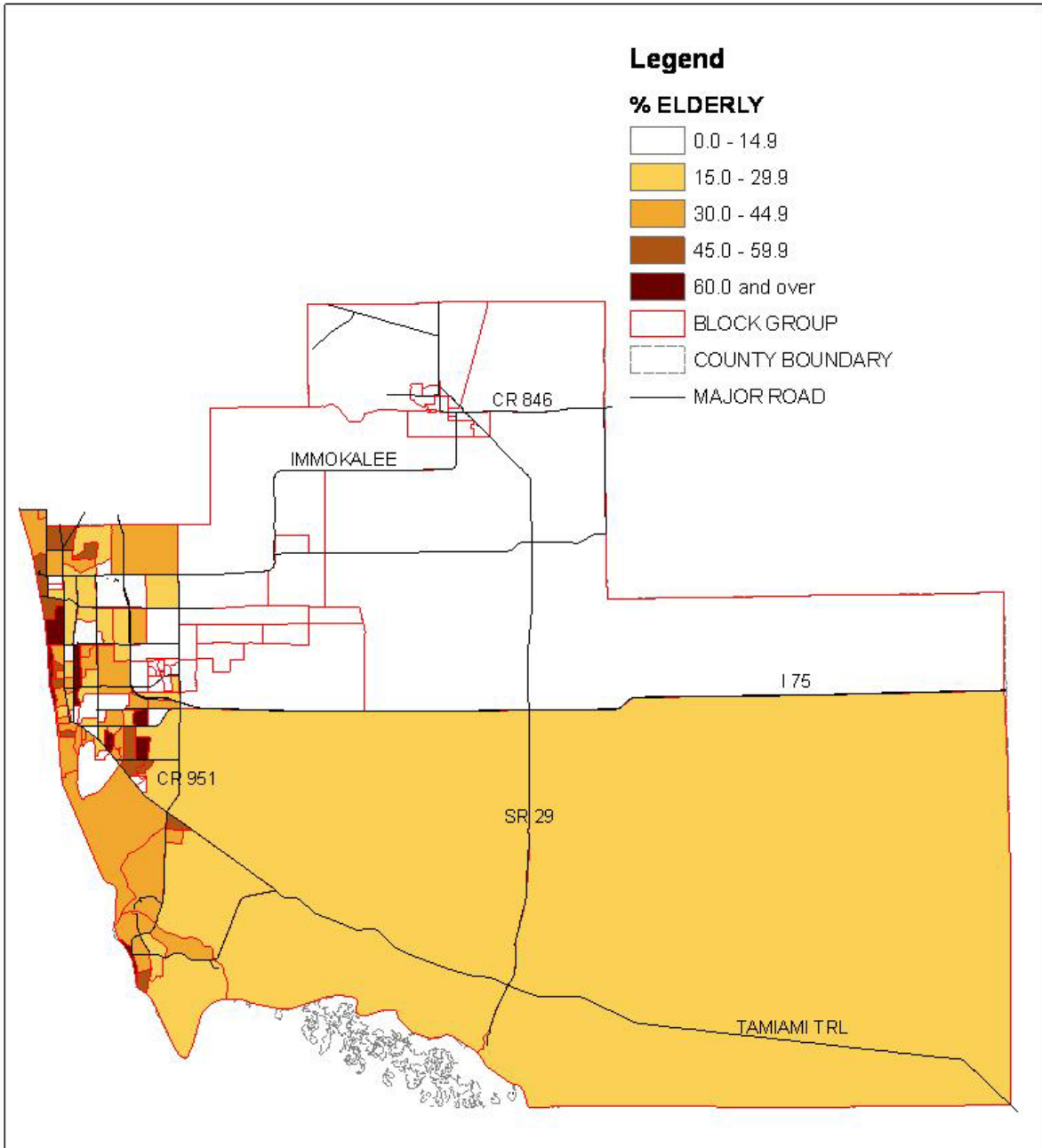
# Analysis of Impediments to Fair Housing – Collier County

## Exhibit 3 – Location Map of Hispanic or Latino Population



# Analysis of Impediments to Fair Housing – Collier County

## Exhibit 4 – Location Map of Elderly Population



## **Analysis of Impediments to Fair Housing – Collier County**

### **CURRENT FAIR HOUSING PROFILE**

The purpose of this section is to provide a summary of the current state of fair housing in Collier County. This includes information on the number of fair housing complaints received, HUD fair housing/sanctions/law suits, and community outreach on the subject of fair housing.

#### **Fair Housing Program**

- Collier County has a fair housing ordinance.
- The County Commission has officially declared April as fair housing month.
- The County holds an annual housing fair where fair housing brochures are made available.
- The County maintains fair housing posters and brochures at its housing office, and distributes fair housing pamphlets to its libraries, social service agencies and churches.

Collectively, these programs utilize a number of methods to keep the issue of fair housing in the public awareness and to make information about the Fair Housing Act easily accessible to the general public.

#### **Distribution of Subsidized Housing**

Exhibits A and B, found in the Appendix, list the housing projects in Collier County that receive a subsidy. These subsidized units are found in locations where a concentration of low to moderate income families reside. Exhibit C provides a map of the locations.

#### **Distribution of all Housing by Income Levels and Values**

A review of the housing stock in Collier County was conducted to determine the location of housing based on household income levels and values. This analysis resulted in maps that depict the location of the housing for various income groups. By examining the maps found in Exhibits D through O (located in the Appendix), it is clear that the resulting scatter diagram shows a similar distribution pattern regardless of the income level or value of the unit. This result indicates that there is no pattern of discrimination or exclusion throughout Collier County.

#### **HUD Sanctions**

There are no HUD sanctions against Collier County. There was a reduction in funding for the FY 2011 and FY 2012 entitlement years due to non-completion of the Cirrus Pointe project. This project was not initiated due to the economic recession and the withdrawal of the developer. Since funding was used in previous years for this project, a reduction has been made by HUD.

#### **Lawsuits**

There are no fair housing lawsuits against Collier County.

## **Analysis of Impediments to Fair Housing – Collier County**

### **Fair Housing Complaints**

HUD's Regional Fair Housing office tracks the number of fair housing complaints received by HUD or by the State of Florida. The state, through its Human Rights Commission, receives funding as a Fair Housing Assistance Program (FHAP) to investigate fair housing complaints in Florida on HUD's behalf.

### **How Collier County Addresses Housing Discrimination**

In 2003, the Board of County Commissioners (BCC) adopted a resolution that opposes discrimination, supports equal rights and opportunities, and promotes the civil and human rights of all Collier County residents. Furthermore, the BCC directed the County Manager to establish and administer, through the Communication & Customer Relations Department, a Community Relations Information and Referral Service with the purpose of providing the public with a source of information, and referrals, on matters affecting human relations and civil rights issues in Collier County. The Community Relations Information and Referral Service acts as a "conduit" between residents and the proper agencies that address discrimination complaints. Staff can provide forms and assist in filing forms.

While the Community Relations Information and Referral Service provides assistance to residents who believe they have a discrimination issue, the service has neither investigative nor enforcement powers. Complaints received by county staff are forwarded to the Florida Commission on Human Relations and other appropriate state and federal agencies.

The County has also published brochures, in English and Spanish that outlines important information that the citizens of Collier County need to be aware of regarding the filing of complaints of discrimination. The local contact number of the dedicated hotline (239-252-6060) for the Customer Service Coordinator is included in the brochures and is noted on the County website. The Florida Commission on Human Relations Toll-Free Hot-line (800-342-8170) is also noted.

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The tables also illustrates that no systemic pattern of discrimination exists in the County. A total of 24 of the 30 complaints (80%) received a “No Cause Finding” which means that no discrimination was found through the investigation. In addition, another 2 cases reached a settlement prior to further action by the state. Therefore, in the past 3.5 years only 4 documented cases of discrimination existed in Collier County. Based on this data, it is determined that no wide-spread, systemic or patterned discrimination exists in the County.

As this table also illustrates the County received a relatively small number of complaints. This is in some measure a result of HUD’s continued public awareness and educational efforts in this area.

In November 2009, a local resident filed a Federal lawsuit against a rental housing complex for discrimination. The basis for the lawsuit was that renters of Haitian decent were charged a higher rental rate than those that were not Haitian. This case is still in court and no resolution has occurred. There was no notification made to representatives in Collier County of the existence of this condition and lawsuit. Since no conclusion to the action has occurred, this case was not recorded in the statistics received from the State of Florida.

To better coordinate complaints and lawsuits filed at the Federal level, it would be best if a mechanism could be developed that allows notification to Collier County. Such notification will allow the County to better track this activity. Collier County would likely not wish to intervene in the case, only to be notified.

### Ethnic Groups with a disproportional need

The following table identifies the Cost Burden based on ethnic distribution. In all categories, Renters have a more significant Cost Burden than Owners. Most non-white categories have a more severe Cost Burden than the average for the County. The HUD definition of disproportional need is when any specific ethnic group has a Cost Burden rate that is 10% higher than the Cost Burden rate for the entire population of the County. Based on this criteria, there is no disproportionate need in Collier County.

Ethnic Group	Owner (75.7%)		Renter (24.3%)	
	Moderate Cost Burden	Severe Cost Burden	Moderate Cost Burden	Severe Cost Burden
White (79.4%)	17.9%	15.9%	24.2%	21.4%
Black (3.6%)	28.1%	22.5%	25.0%	37.6%
Hispanic (15.6%)	26.8%	30.8%	29.7%	25.6%
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1. Public input
2. Agency interviews

### **Public Input**

The County seeks comments on fair housing at its annual HUD Community Development public hearing cycles.

### **Agency Interviews**

Mr. Albert Batista, Esq. of Legal Aid reported that their office had not received any formal complaints about fair housing over the last year. Mr. Batista did indicate issues regarding tenant/property manager interaction which is discussed in the report.

### **Local Newspapers**

Local/daily newspapers that serve the County do not print HUD's '*Publisher's Fair Housing Notice*' at the beginning of the Real Estate section of their newspapers on a daily basis.

## **Analysis of Impediments to Fair Housing – Collier County**

### **HOME MORTGAGE DISCLOSURE ACT**

The HOME Mortgage Disclosure Act (HMDA) requires that local banks keep track of their local mortgage activity by race, sex and location (census tract). This information is then amalgamated into regional information. Collier County is also known as the Naples Metropolitan Statistical Area (MSA).

Collier County is a highly affluent county and has a high level of owner-occupancy.

HMDA data does not reveal any evidence of red-lining in any particular areas or that minority homebuyers were being excluded from the mortgage market. However, this report does spotlight a need for credit counseling for low-income minority households interested in homeownership.

Data from the Federal Financial Institutions Examination Councils was collected to measure the mortgage activity in Collier County and to determine if any pattern of discrimination exists in the issuance of mortgages. Exhibits P through T (in the Appendix) provide the data collected. Exhibits P through S include demographic, household income and other data by Census Tract in the County.

The primary information for this analysis is Exhibit T which provides a breakdown of the mortgage applications and results by ethnic group and household income level. This table lists the number of applications and the outcome of those applications. The data does show a higher percentage of denials for minority households than for non-minority groups. However, a further examination reveals that these denials may be more due to lower household incomes and ability to meet mortgage requirements.



## Analysis of Impediments to Fair Housing – Collier County

### ANALYSIS OF IMPEDIMENTS

The purpose of this section is to review whether any impediments to fair housing exist within Collier County. This section examines the housing market, mortgage lending, sub-prime lending, lenders, brokers, apartment owners/landlords, home insurance, and persons with disabilities, large families, and regulatory barriers to affordable housing.

#### Housing Market

Countywide, 77% of all households are homeowners. In 2010, the median value for all housing was \$271,300, an increase from \$149,000 in 2000, but a decrease of \$500,000 at the height of the market during the real estate boom.

From 2006 to 2009, the numbers of foreclosure homes in Collier County have increased gradually. In 2006 there were only 589 foreclosures; it went up in 2007 to 2,787 homes; in 2008 it jumped to nearly three times to a record 9,341 homes; and finally in 2009 it stood at 12,251 properties.

Over one third (34.5%) of the County's renters paid over 30% of their income for rent. Naturally, the lower the household's income the more likely they were to pay over 30% of their income for rent.

As the Census also reveals, tenure patterns vary by the race, age and income of the householder. When separated by race, ownership patterns differ significantly. As the following table shows, minority ownership rates lag those for white households.

While almost 80% of the County's white households are owners, only one-third of African-American households and less than half of Hispanic households are owners.

**Ownership by Race**

Race	Ownership Rate		
	Collier	US	Florida
White	79%	71%	74%
African-American	33%	46%	50%
Hispanic	48%	46%	56%
County	76%	68%	70%
<i>Source: 2000 Census.</i>			

The County has also adopted a density bonus and impact fee deferral program for affordable housing. As of this date the County is researching the legality of adopting inclusionary zoning and linkage fee programs for affordable housing.

## **Analysis of Impediments to Fair Housing – Collier County**

Because the County’s affordable housing programs are targeted toward households making below 80% of the median family income, they tend to favor lower-income and minority households.

### **Section 8 Vouchers/Public/Assisted Rental Housing**

The Collier County Public Housing Authority provides 641 subsidized farmworker units, a 192 bed farmworker dormitory and administers 440 housing choice vouchers. The Authority also administers the County’s Tenant Based Rental Assistance Program.

There are 132 governmental assisted rental projects located within the County with a total of 6,466 assisted units. These units include those for families, elderly and for the disabled. Approximately 28% of the County’s renters live in a subsidized unit. In addition, the County uses its Tenant Based Rental Assistance to assist low-income families. All these programs are conducted on a countywide basis.

### **Lenders**

Many banks in Collier County participate in the county’s Affordable Housing Consortium and provide first-time homebuyer programs for low-income households. The lenders routinely provide fair housing training to all their mortgage program personnel. The County also works closely with these lenders in its own affordable housing programs.

### **Branch Banks**

Much like other retail facilities, the location of branch banks in any particular area is often driven by the amount of money flowing into a community. As a result, high-income areas tend to have more branch banks than low-income areas. Low-income areas also have a higher percentage of households who do not have checking or savings accounts and/or deal in the cash economy.

Collier County is served by hundreds of branch banks, many of which are near its low-income neighborhoods. The lack of financial institutions is primarily an issue in the rural, eastern area of Collier County.

The predatory lending issues of the past have been reduced substantially due to government intervention and awareness by the industry and customers alike. However, the problem that exists today is the lack of available mortgages for persons of most income groups. The ability to obtain a mortgage has declined significantly due to tight credit restrictions.

### **Brokerage Services**

The Naples Area Board of Realtors (NABOR) represents the County’s professional real estate community. As part of the services the NABOR provides to its membership is an orientation session for all new brokers/realtors. As part of this process the new members are briefed and

## **Analysis of Impediments to Fair Housing – Collier County**

tested on fair housing laws. In addition, yearly seminars and continuing education programs feature fair housing complaints.

### **Apartment Owners**

Locally, the Naples area apartment owners are members of the Southwest Florida Apartment Association. Collier County is also a member of this organization. The Statewide Apartment Owners Association holds twice yearly seminars for its members at which time national experts on fair housing make training presentations.

### **Persons with Disabilities**

The County utilizes the Florida version of a national building code, which incorporates all of the requirements of the Americans with Disabilities Act (ADA). The County's Development Services Department is charged with enforcing these requirements.

A high percentage of the units in the County's housing stock are single-family units. These units are typically built at grade level, which would facilitate their conversion to handicapped-accessible.

Review of the data regarding the number of complaints of discrimination in housing show that the majority are based on reasons of disability. Although these cases may not have been found to not be based on discrimination, education for property owners may be required so that any potential misunderstandings are reduced.

### **Large Families and Families with Children**

In 2000, only 3% of the County's housing units were found to be overcrowded (1.01 or more persons per room), which is half the statewide/national rate. Although families with children appear to be welcome in all (non-seniors only) neighborhoods, 16.7% of the fair housing complaints filed over the past 3.5 years were over familial status.

### **'NIMBY' (Not in my Backyard)**

Community opposition to governmental actions is a growing problem across the country as population growth creates additional pressures on natural and governmental resources. The classic example of this problem is that most citizens prefer the nearest park to be one-block away from where they live. Close enough to walk to, but far enough away not to be a noise or traffic problem.

In a county like Collier where average home values are high, residents raise concerns about any changes that might affect property values. These concerns are typically economic or traffic related rather than racially inspired.

## Analysis of Impediments to Fair Housing – Collier County

The County has taken a number of steps to address this issue in addition to targeting its federal and state grant funds toward the production of affordable housing. These include:

- a. The County's Affordable Housing Advisory Committee (AHAC) has sponsored a number of public information initiatives to support the need for affordable housing and to overcome the misconceptions about affordable housing that contribute to NIMBYISM.
- b. The County is working closely with Habitat for Humanity to provide decent, safe affordable housing.
- c. The County is in the process of reviewing regulations that may address the development of affordable housing.

While NIMBYISM can never be stopped, the County has taken all reasonable steps to address this issue.

### Public Policies

**Relocation Policies** – The County, as required by state and federal laws, has long-standing relocation policies in place. In addition the State of Florida has the most liberal condemnation law in the nation to ensure that any resident or business displaced by governmental action is amply compensated. The County's five-year FY2011-FY2015 Consolidated Plan anticipates no activities that may require relocation.

**Appropriate Siting for Group Homes** – In 1995, the County amended its Land Development Code to adopt locational siting criteria and to allow group homes as a conditional use in all residential areas as required by state law. The County currently has a wide-range of group homes.

**Building Codes** – Collier County utilizes the Florida Building Code, which is an amended version of the Southern Building Code Congress International Building Code, the nation's standard building code. This code was adopted after Hurricane Andrew. Chapter 11 of the Florida Building Code includes all of the handicapped accessibility requirements of federal law.

**Regulatory Reduction** – As a recipient of state housing funds under the State's Housing Initiative Partnership program (SHIP) the County was required to conduct a regulatory self review of its local ordinances in order to reduce the cost of providing housing. This self review was officially titled the Affordable Housing Incentive Plan (AHIP).

### Regulatory Reduction Summary

- Expedited Permit Reviews – All affordable housing developments receive priority review and processing.

## **Analysis of Impediments to Fair Housing – Collier County**

- The Land Development Code was amended to allow:
  - Density bonuses for affordable housing
  - Group homes with less than six beds are allowed in all residential districts as a conditional use (to avoid over concentration).
- Maintains a list of vacant county-owned property available for development as affordable housing.
- All new proposed regulations are reviewed (prior to adoption) by the Affordable Housing Advisory Committee for their impact on affordable housing.

In conclusion the County has conducted a rigorous regulatory review, adopted incentives and streamlined its development regulations for affordable housing.

### **Conclusion**

No overt acts of discrimination were revealed.

## **Analysis of Impediments to Fair Housing – Collier County**

### **IDENTIFICATION OF IMPEDIMENTS**

The Analysis of Impediments to Fair Housing identified impediments in several areas:

#### **Discrimination by Class/Language**

The County generated 4 fair housing cases in FY2011. These figures indicate that a systemic pattern of discrimination does not occur.

An issue does occur primarily in the Immokalee area with conflicts between tenants and property managers. The underlying issue appears to be primarily one of language and a misunderstanding of each other and the rules that apply. The conditions that exist are with tenants who are primarily Creole speaking Haitians, having conflicts over rules with the primarily Spanish speaking property managers. The results have often been an argument that has ended with the property manager calling the Sheriff's Department to resolve the issue. Many times the tenant feels unfairly treated and moves out of the unit.

A resolution could occur with a translation of rules into Creole and a careful reiteration of the process to follow. It is unclear to many tenants that they may have done something wrong. Property managers are encouraged to translate community rules to facilitate their communication with non-English speaking tenants.

Another solution is to provide a liaison position in the Sheriff's Office that can offer assistance regarding these issues before they become a problem.

Another recommendation to insure non-discrimination in the housing market in Collier County would be to institute a program of "testing" of the housing market properties and professionals.

This type of program can insure that discriminatory housing practices do not happen in the future. This testing would be of real estate agents, rental managers/agents and landlords to ascertain whether there is any "racial steering" taking place. The basis for this type of exercise is to send out two matched persons to rent an apartment. The individuals would be of the same gender, have the same income and credit rating. The difference between the individuals would be their race or ethnic group. The county can then determine whether the agent/landlord/manger is treating both individuals in the same manner. Both individuals should be shown the same housing product, at the same price, at the same location, with the same availability.

Should the individuals be treated differently, the county can then determine and assist with the types of training local real estate professionals need. This training can cover local, state or federal regulations and can be "pro-active" instead of being viewed as "re-active" or after the fact.

## **Analysis of Impediments to Fair Housing – Collier County**

### **Unemployment**

High unemployment has negatively impacted Collier County and generated significant problems in the housing sector. Foreclosure rates have increased forcing people out of the ownership market and into rentals. In addition, new rental policies have required credit checks on potential renters. Due to the foreclosure on their credit history, these same people have trouble getting rental units as well.

The ability for some people to pay housing costs (either owner or renter) has declined due to the economic conditions. Until the recession ends and job creation increases, this condition will continue. Additional pressure will be placed on rental assistance programs further depleting available funds.

### **Transportation**

One of the cornerstones of affordable housing is the location of decent housing near the workplace for the population, especially the lower paid workers. Many of the lower paid service workers live in Immokalee in the eastern portion of Collier County. Most of these service jobs are along the coast in the western portion of the County. Travel to work has been a major problem for this segment of the population.

Due to funding constraints, public transit is limited for this population. The private sector has addressed this issue to some extent through the provision of private transportation services for the service workers. Although this service has great merit, the dependence of long travel in a closed market is not the best form of serving their needs.

### **Land Use**

Provisions in the Comprehensive Plan and the Land Development Regulations in Collier County make the provision of affordable housing difficult and provide a barrier. Although construction of new units is not currently a priority, these regulations should be addressed for the long-term solutions. Specific items identified include:

The Collier County Comprehensive Plan is a document required by State law that provides for a Land Use Planning for the community including:

- Characteristics of Land Use (location of types of Land Uses and allowable development within these areas)
- Demographics
- Public Service Requirements
- Infrastructure Requirements
- Environmental Concerns
- Capital Improvement Plans
- Transportation
- Other Elements, as Required

## Analysis of Impediments to Fair Housing – Collier County

Barriers posed by land use controls, zoning regulations and fees include:

- The Comprehensive Plan language requires increases in residential density for affordable housing through the rezoning process; this policy results in a lengthy rezoning process.
- The Comprehensive Plan requires the Board of County Commissioners to make the determination for permitted density for the Density Rating System. This centralization increases the process timeframe.
- Current Comprehensive Plan policies restrict bonus density and other incentives to specific geographic areas. Current policies limit where affordable housing incentives can be applied as well as enforcing traffic concurrency rules.

Land Development Regulations are a more specific set of rules that impact the method in which development can occur.

- The Land Development Regulations require a costly and time consuming process for securing bonus densities. This process includes approval by the Board of County Commissioners.
- The Land Development Regulations require a costly and time consuming process to approve site plans process required for farm labor housing and group homes;
- The Land Development Regulations provide a program (enabled by the Comprehensive Plan) of impact fee deferrals. The County might consider waiving impact fees for affordable housing projects.
- The process required under the land development regulations for compliance with environmental standards adds cost to the development of affordable housing;
- Generally, the process for securing approval of affordable-workforces housing permits is costly, time consuming, and unpredictable.



## **Analysis of Impediments to Fair Housing – Collier County**

### **ACTIONS TO REDUCE IMPEDIMENTS**

#### **Discrimination Based on Race/National Origin or Disability**

Collier County will ensure that any fair housing complaints received are forwarded to HUD for investigation. In addition, the County will take the following actions to raise public awareness on this issue.

1. Continue to enforce its fair housing ordinance
2. Proclaim April of each year fair housing month and display fair housing posters in all public buildings.
3. Continue to print and distribute (in English/Spanish) fair housing bookmarks in the County's libraries and to distribute fair housing pamphlets to its social service agencies and churches.
4. Continue to provide HUD's fair housing complaint forms (in English/Spanish) at County offices.
5. Contact the Board of Realtors and the Apartment Managers' Association to volunteer to participate in fair housing training at their meetings, symposiums, and housing events.
6. Continue to provide fair housing information at the County's annual housing fair, and to seek comments regarding fair housing during the County's annual HUD public meeting cycle.
7. Continue to provide credit counseling for low-income potential homebuyers and targeting housing programs on low-income households.
8. Where applicable, require all affordable housing subrecipients to develop fair housing marketing plans.
9. Request that HUD provide the County with copies of its fair housing television commercials to run on the County's public access channel.
10. Request that HUD provide the County with brochures/ads warning about the dangers of predatory lending.
11. Request that HUD contact the local newspaper to request that they publish HUD's Publisher's Fair Housing Notice in the real estate section of the newspaper.
12. Encourage rental communities to provide translations of community rules for tenants to reduce confusion and tenant/property manager conflicts.
13. Distribute guidelines to property owners regarding the rights of the tenants.

## **Analysis of Impediments to Fair Housing – Collier County**

14. Facilitate the establishment of a liaison position in the Sherriff’s Office to reduce the tenant/property manager conflicts.
15. Institute a housing testing policy on a periodic basis to insure that all groups are treated fairly.
16. Encourage the revision of the Land Development Regulations to allow more affordable housing units to be constructed as required.
17. Encourage the continued practice of private transportation for workers from eastern Collier County to the jobs in the west.
18. Promote economic development to increase job creation.

### **Financial Plan for Accomplishment**

The County will continue to set aside funds each year from its entitlement grant to fund fair housing activities on an annual basis.

### **Mechanism for Updates**

The Human, Housing and Veteran Services Department (HHVS) is the lead contact agency, and as such maintains up-to-date information on all changes of federal, state and local rules. This office will maintain and keep track of changes in legislation and any required applicable actions to ensure compliance with HUD goals and rules.

### **Commitment from Local Officials**

The Board of County Commissioners through both its proclamation and funding will provide evidence of its commitment to fair housing.

# **APPENDIX**

Exhibit A

The following is a listing of all of the subsidized housing projects in Collier County.

Assisted Housing Inventory - Immokalee

Development Name	Location	Total Units	Assisted Units	Population Served
Cypress Run	Immokalee	40	40	Elderly
Farmworker Village Phase Vi	Immokalee	641	641	Farmworker
Garden Lake Apts Dimension One Mgmt.	Immokalee	66	66	Family
Her Villas Immokalee Dimension One Mgmt.	Immokalee	41	41	Family
Immokalee Apts	Immokalee	100	100	Family
Jackson Apartments	Immokalee	10	10	Family
So Villas Immokalee	Immokalee	35	35	Family
Willowbrook Place	Immokalee	42	42	Family
Crestview Park	Immokalee	208	208	Family
Crestview Park II	Immokalee	96	96	Family; Family;
Eden Gardens	Immokalee	51	51	Farmworker
Eden Gardens II	Immokalee	37	26	Farmworker
Eden Gardens Supportive Housing	Immokalee	4	4	Homeless
Esperanza Place Rental	Immokalee	45	45	Farmworker
Immokalee Senior I	Immokalee	30	30	Elderly Family;
Main Street Village	Immokalee	79	79	Farmworker
Oakhaven	Immokalee	160	160	Farmworker
Sanders Pines	Immokalee	40	40	Farmworker
Summer Glen	Immokalee	45	45	Elderly; Family
Timber Ridge of Immokalee	Immokalee	34	34	Farmworker

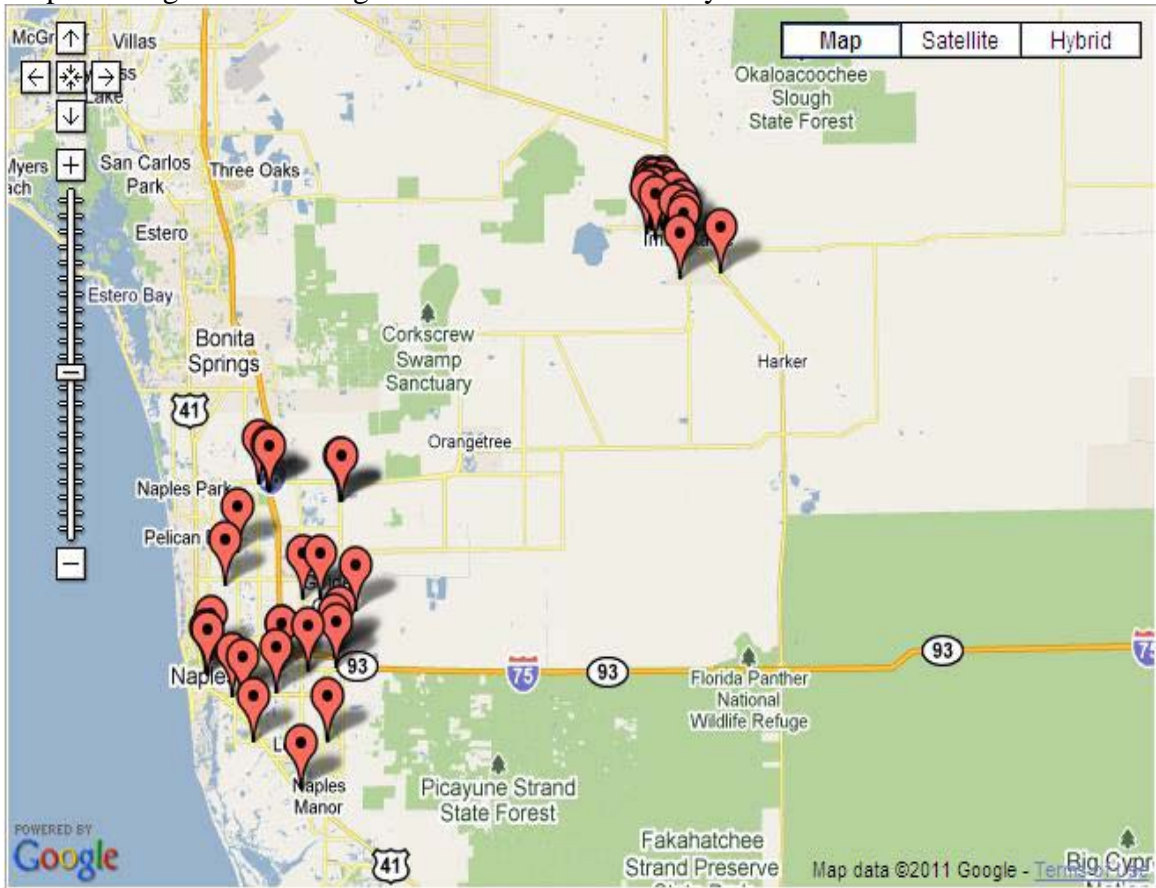
Exhibit B

Assisted Housing Inventory - Naples

Development Name	Location	Total Units	Assisted Units	Population Served
Bear Creek - Naples	Naples	120	120	Family
Belvedere Apartments	Naples	162	32	Family
Brittany Bay	Naples	184	184	Family
Brittany Bay II	Naples	208	208	Family
College Park	Naples	210	210	Family
Collier Housing Alternatives	Naples	10	10	Disabled
George Washington Carver	Naples	70	70	Family
Goodlette Arms	Naples	250	242	Elderly; Family
Heritage	Naples	320	320	Family
Heron Park	Naples	248	248	Family
Housing Alternatives Of SW Florida	Naples	12	12	Disabled
Jasmine Cay	Naples	72	72	Family
Laurel Ridge	Naples	78	78	Family
Noah's Landing	Naples	264	264	Family
Ospreys Landing	Naples	176	176	Elderly
Saddlebrook Village Apartments	Naples	140	140	Family
Saxon Manor Isles Apartments	Naples	128	128	Family
Saxon Manor Isles Apartments II	Naples	124	124	Family
Summer Lakes Apartments	Naples	140	140	Family
Summer Lakes II	Naples	276	276	Family
Turtle Creek	Naples	268	268	Family
Tuscan Isle	Naples	298	298	Family
Villas of Capri	Naples	235	235	Family
Whistler's Cove	Naples	240	240	Family
Whistler's Green	Naples	168	168	Family; Farmworker
Wild Pines of Naples II	Naples	104	104	Family
Windsong Club	Naples	120	120	Family

Exhibit C

Map showing assisted living facilities in Collier County



Source: Shimberg 2011

Exhibit D

**50% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$74,952  
(Units distributed by Commission District)**

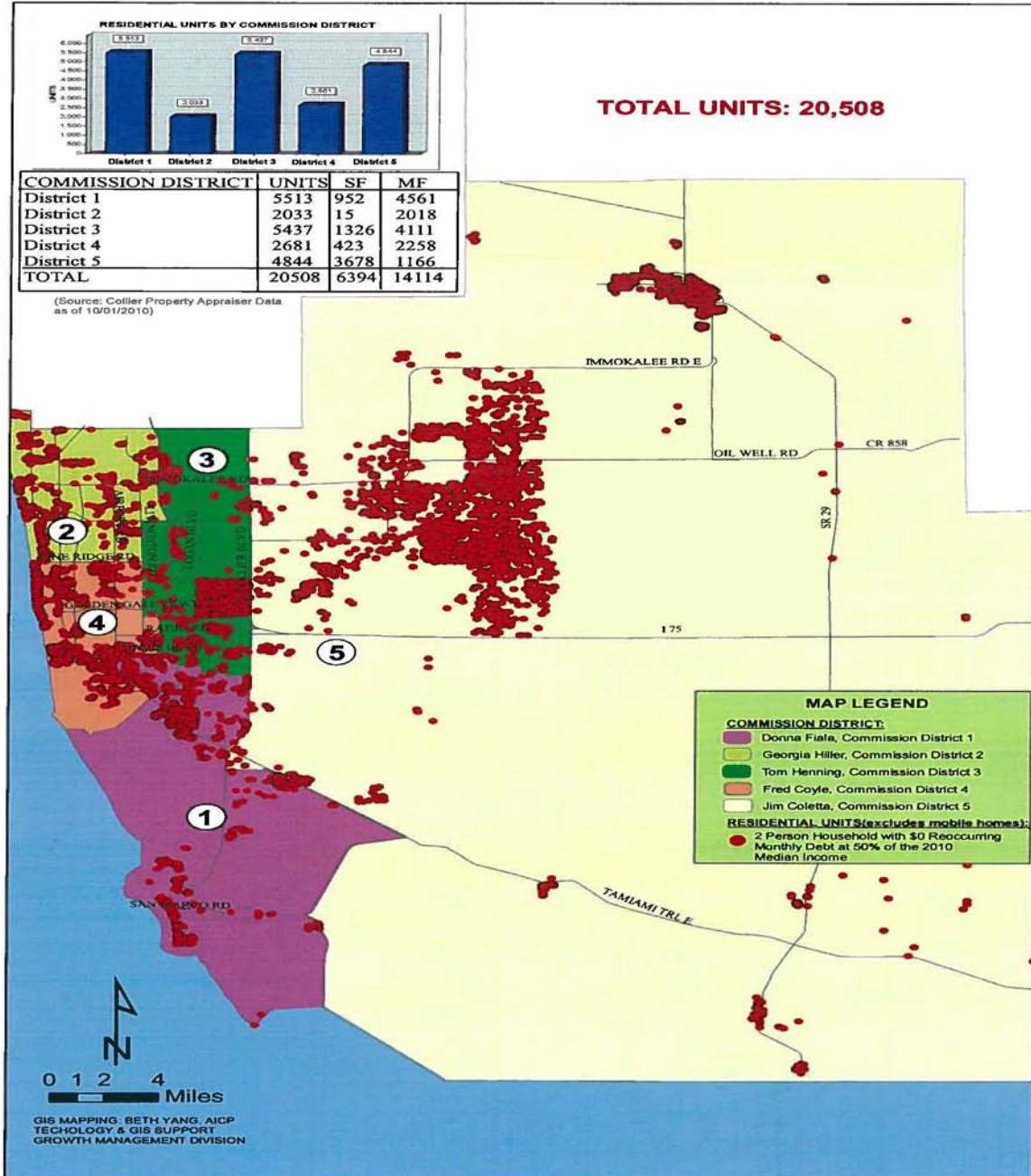


Exhibit E

**80% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$143,576  
(Units distributed by Commission District)**

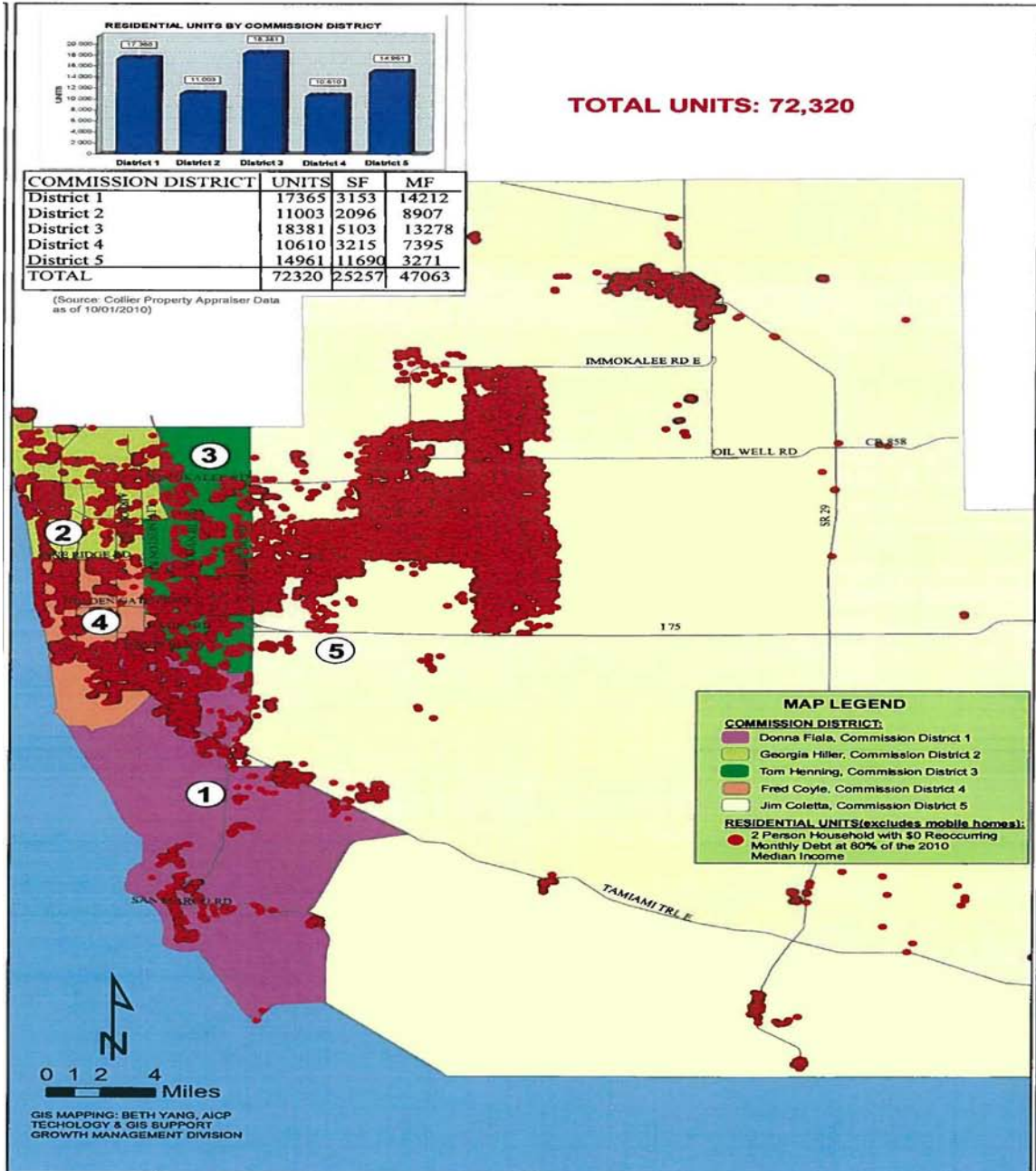




Exhibit F

**120% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$235,259  
(Units distributed by Commission District)**

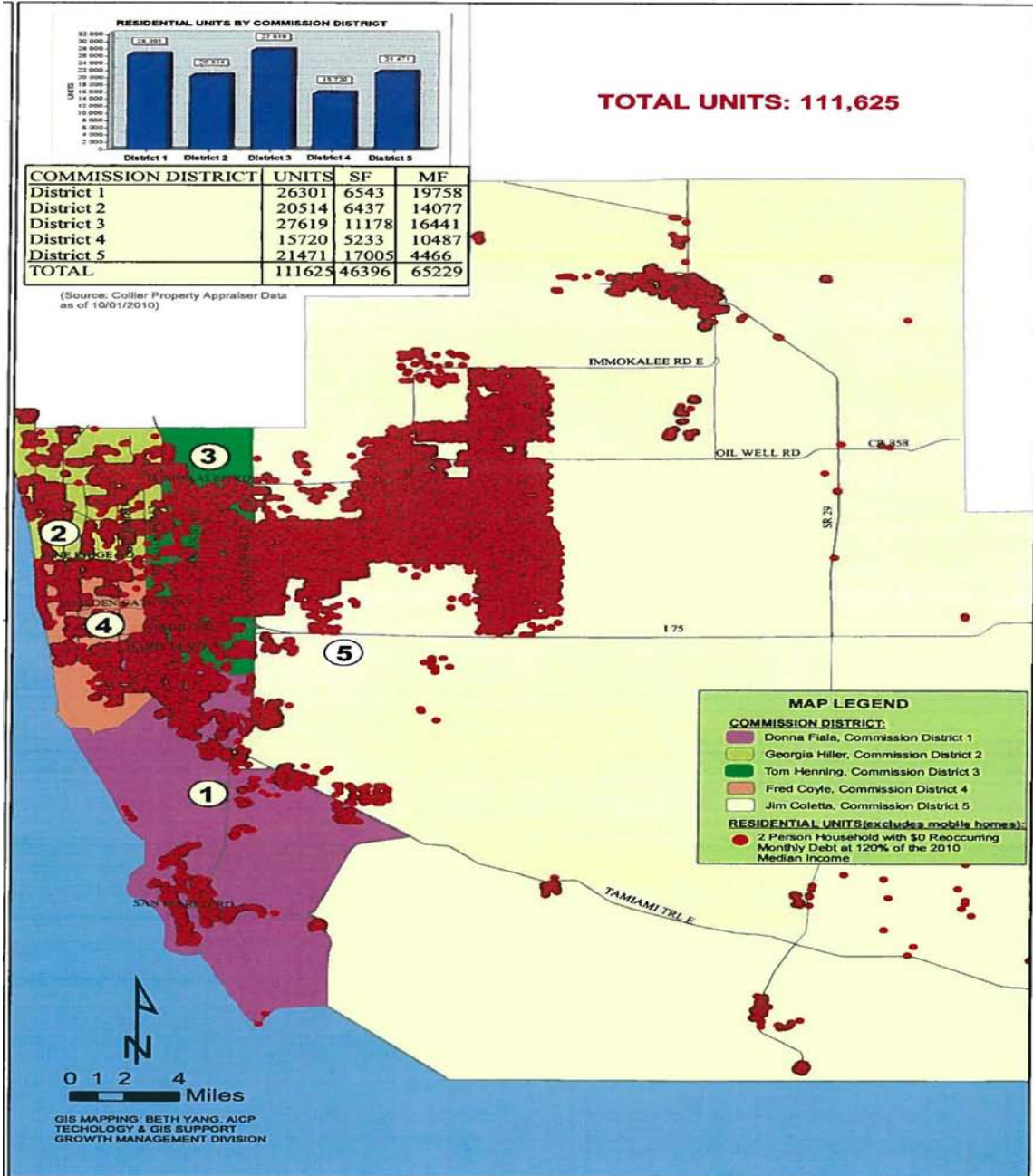


Exhibit G

**50% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$103,430  
(Units distributed by Commission District)**

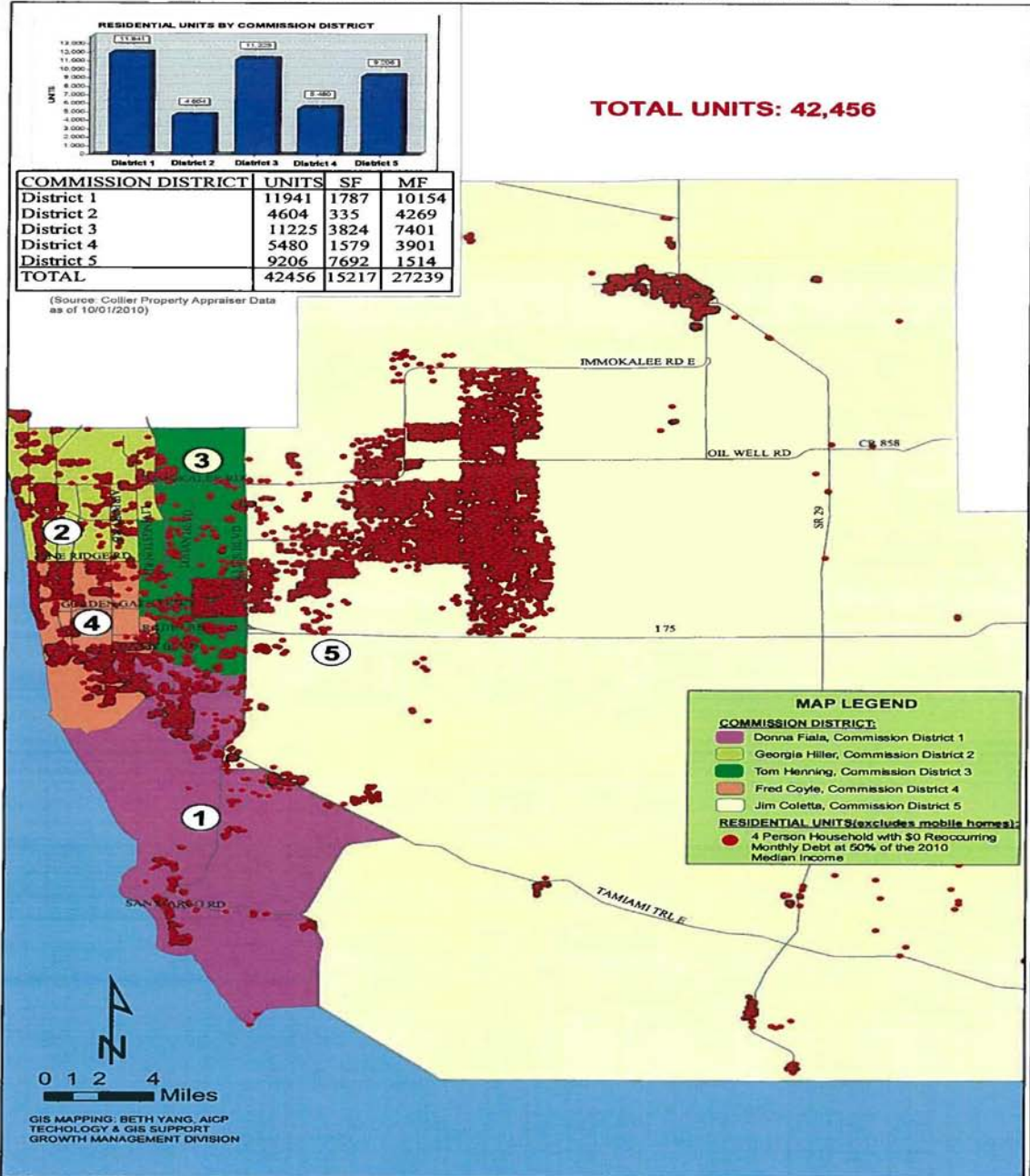


Exhibit H

**80% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$189,260  
(Units distributed by Commission District)**

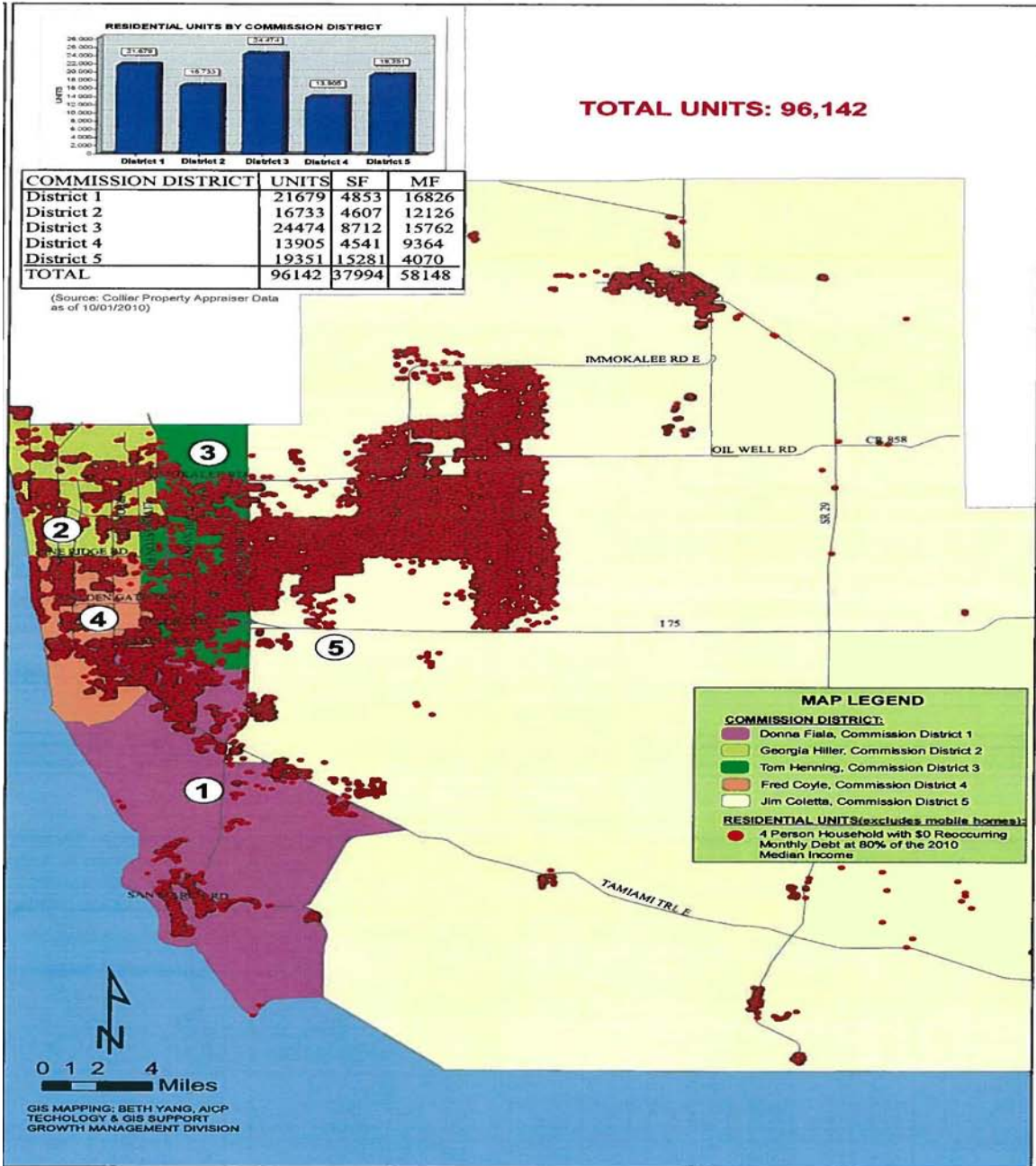
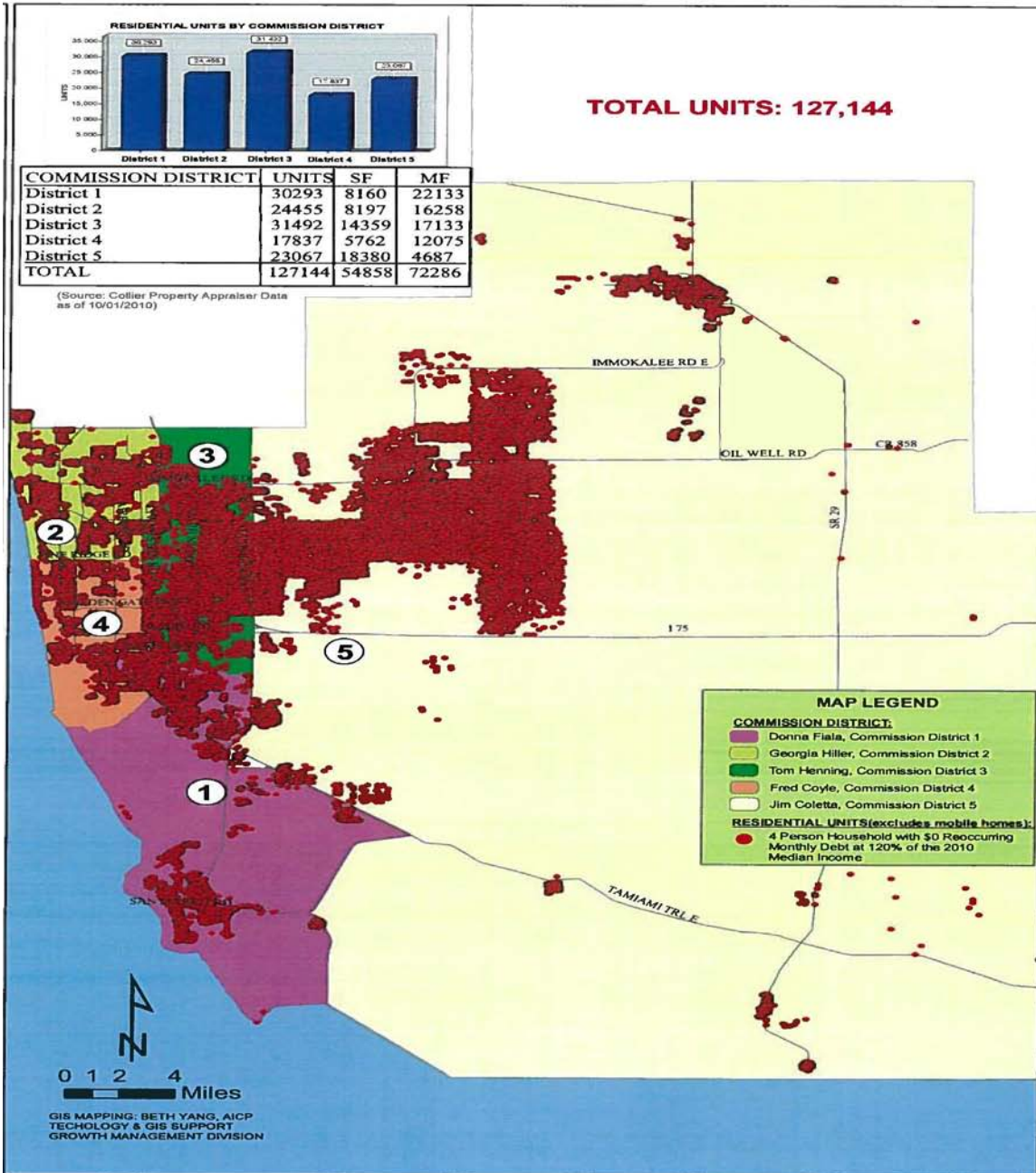


Exhibit I

**120% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$0 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$303,607  
(Units distributed by Commission District)**



**50% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$27,489  
(Units distributed by Commission District)**

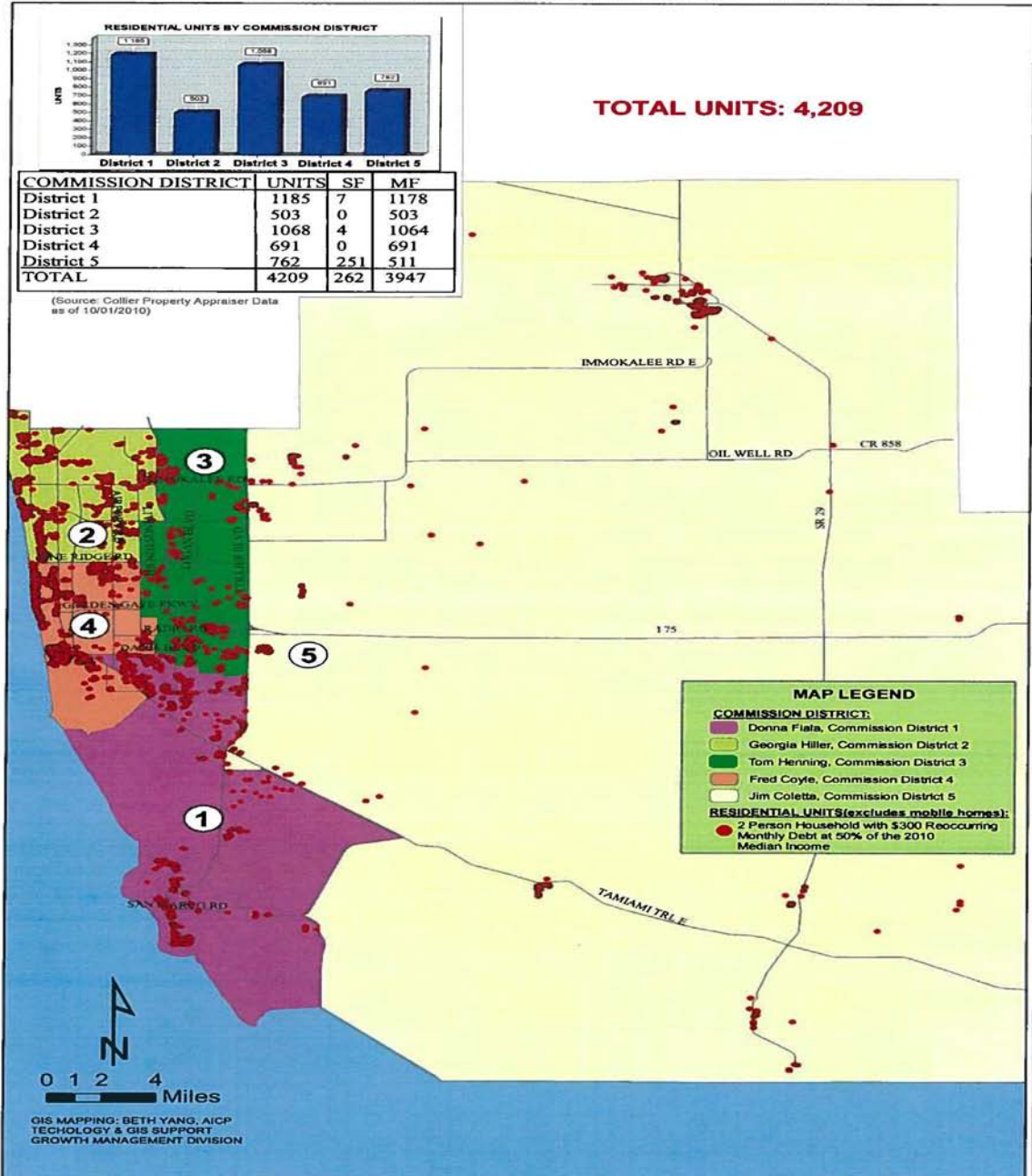
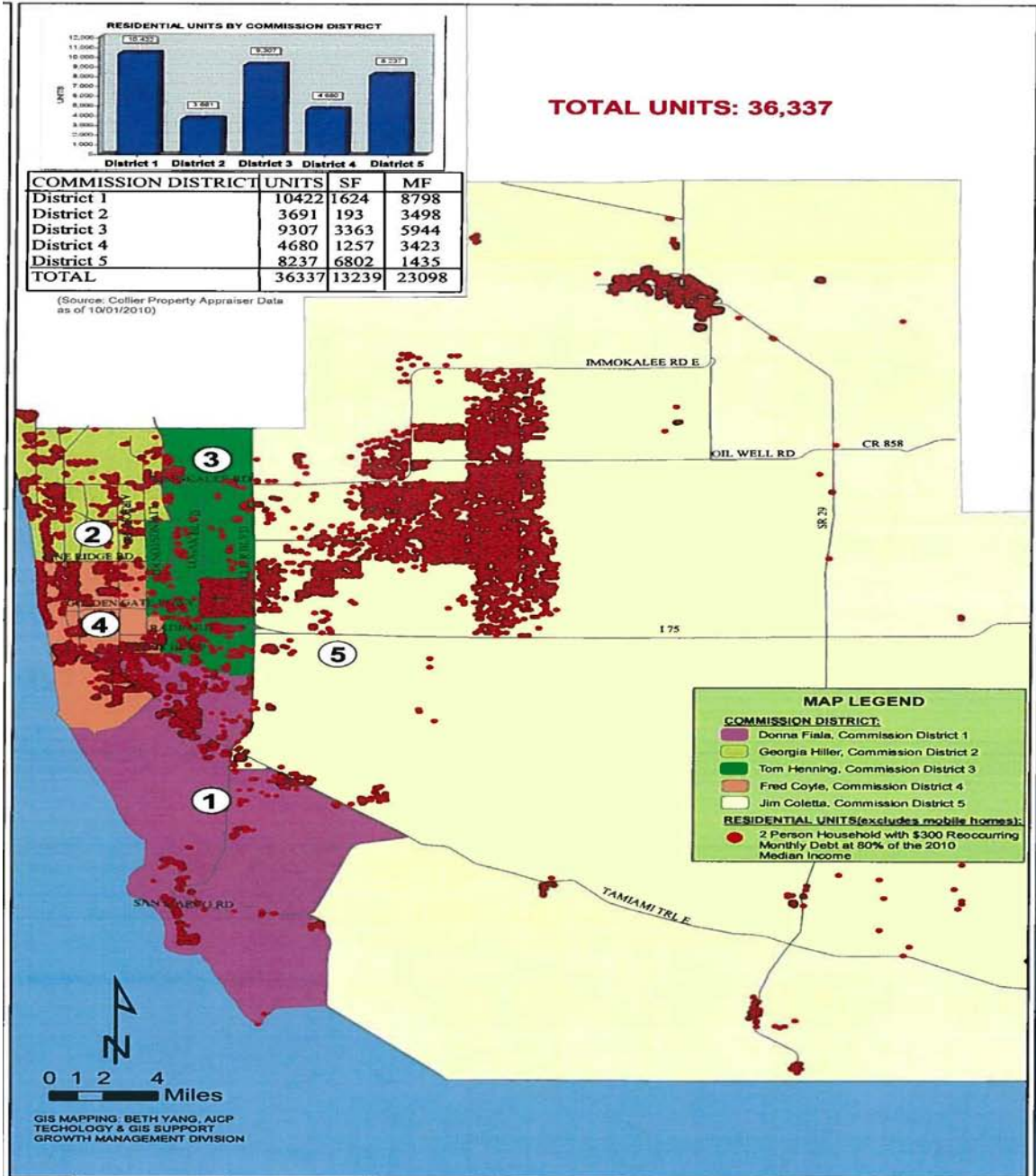


Exhibit K

**80% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$96,113  
(Units distributed by Commission District)**



**120% of the 2010 Median Income  
of \$72,300 for a 2 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$187,796  
(Units distributed by Commission District)**

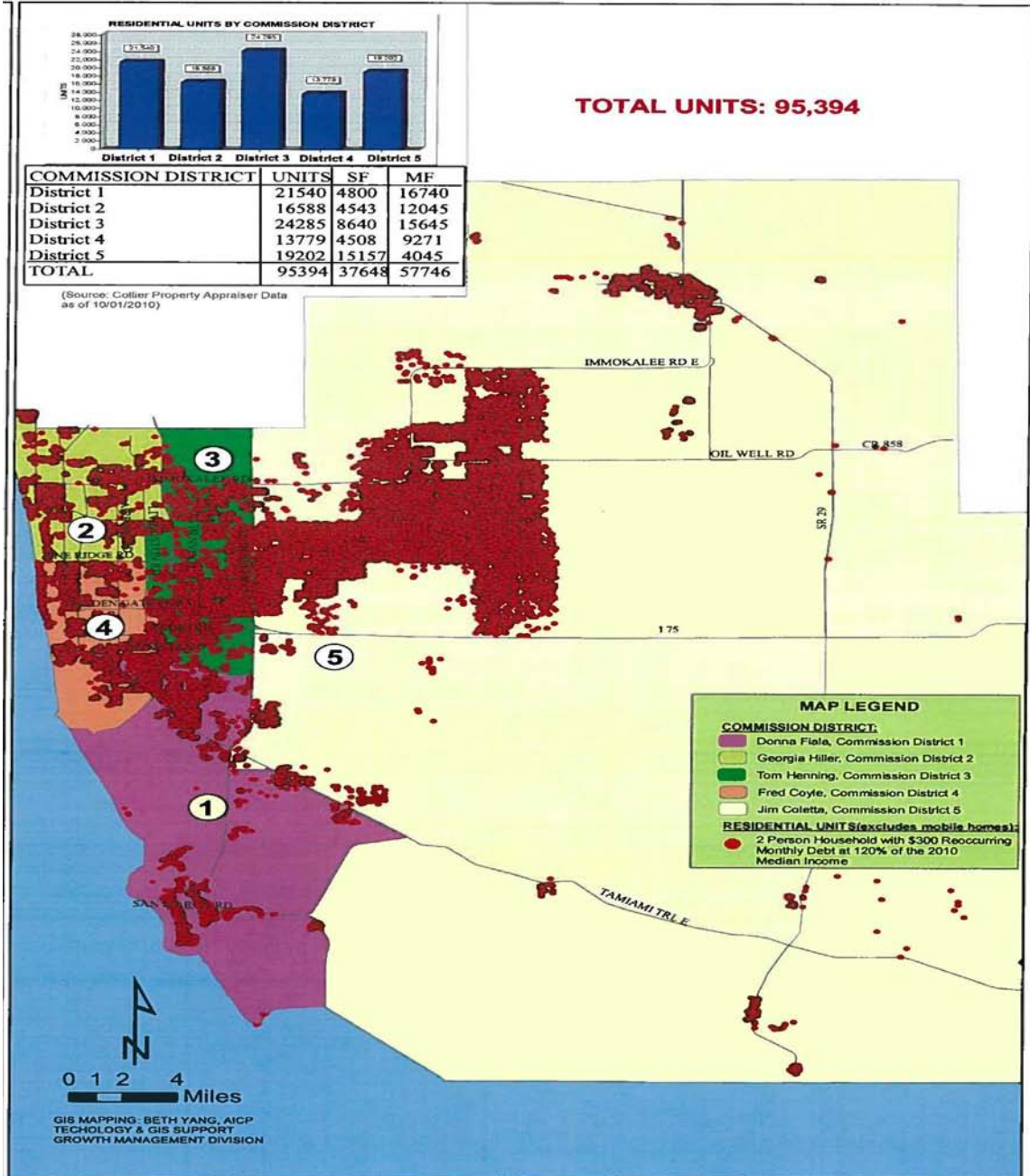


Exhibit M

**50% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$55,967  
(Units distributed by Commission District)**

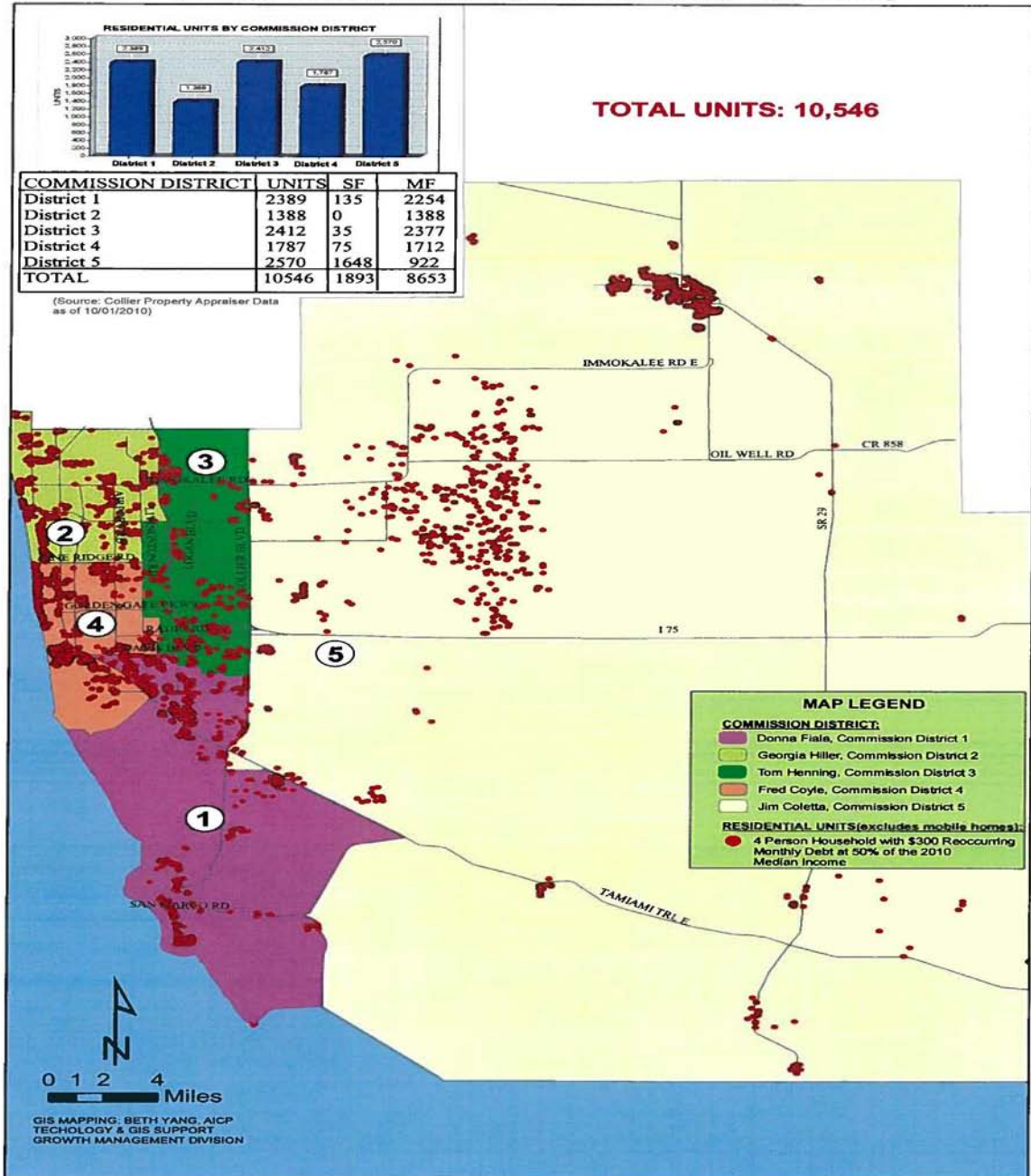




Exhibit N

**80% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount Is \$141,496  
(Units distributed by Commission District)**

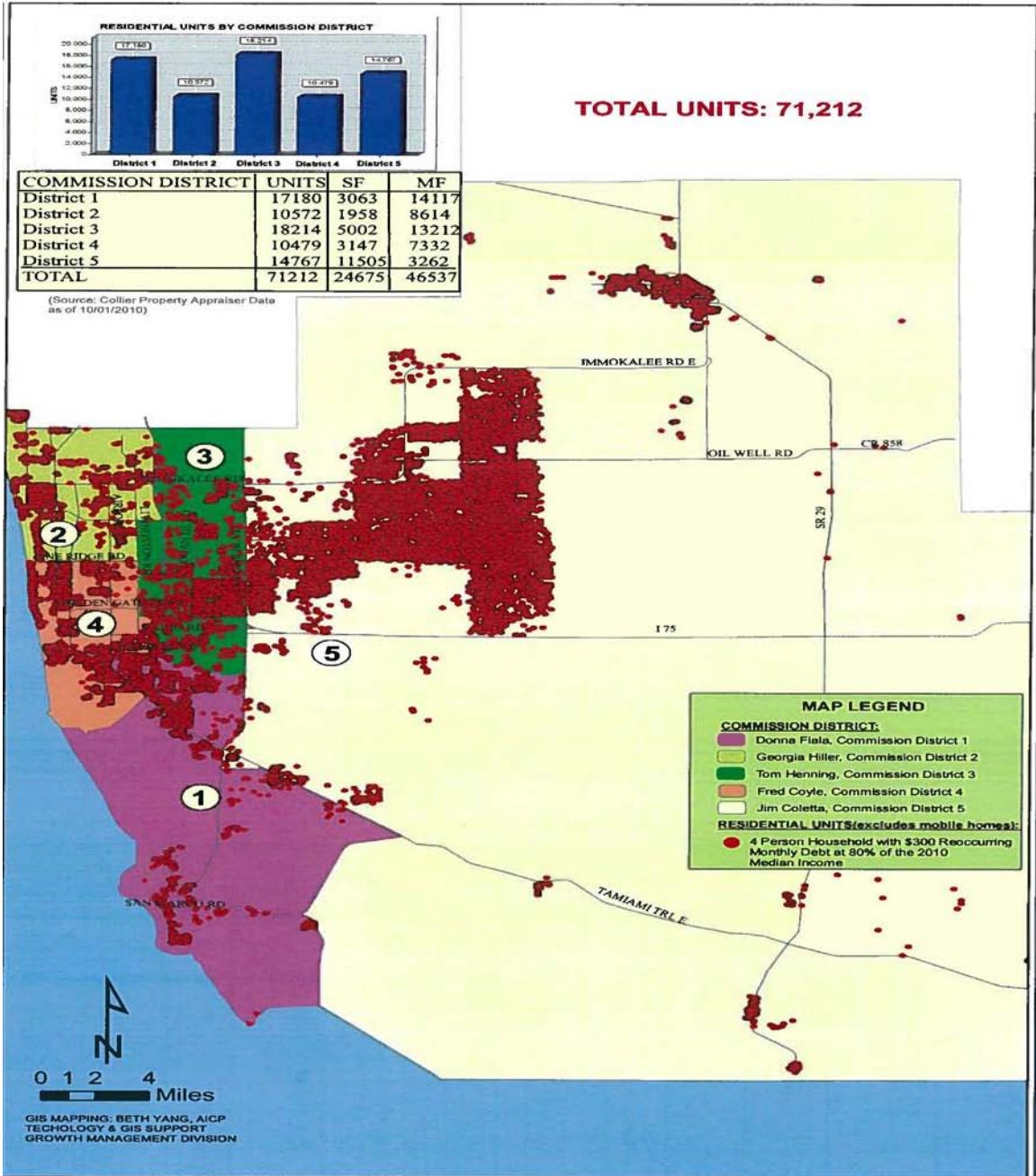


Exhibit O

**120% of the 2010 Median Income  
of \$72,300 for a 4 Person Household  
with a \$300 Reoccurring Monthly  
Debt - Affordable Mortgage Amount is \$256,143  
(Units distributed by Commission District)**

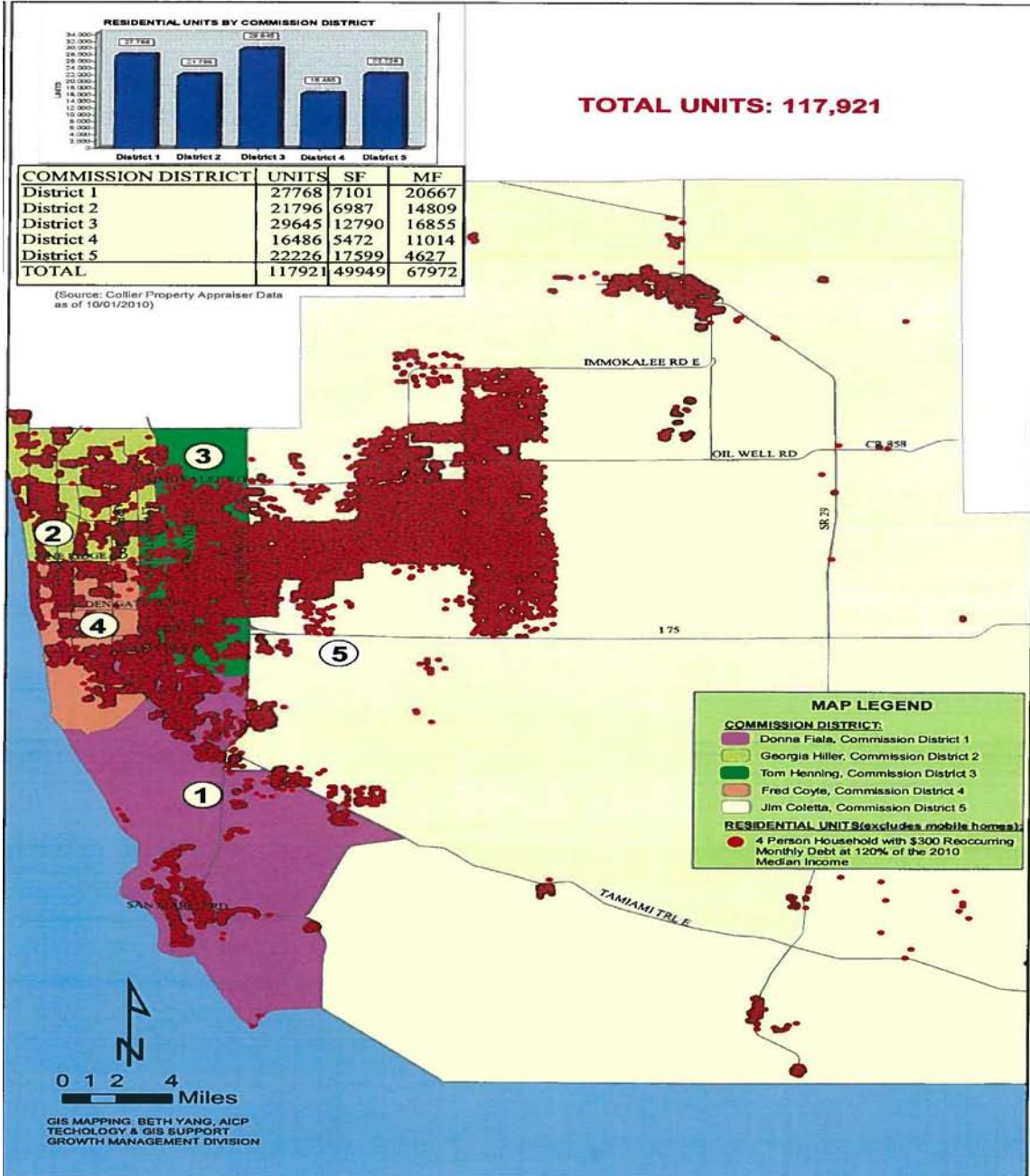


Exhibit P – 2010 FFIEC Census Report - Demographic

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2010 HUD Est. MSA/MD non-MSA/MD Median Family Income	2010 Est. Tract Median Family Income	2000 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
1	Upper	No	134.52	\$72,300	\$97,258	\$73,355	3649	2.93	107	1285	1625
2	Middle	No	94.07	\$72,300	\$68,013	\$51,298	2199	9.46	208	737	966
3.01	Upper	No	151.81	\$72,300	\$109,759	\$82,786	3532	4.33	153	1676	1563
3.02	Upper	No	153.5	\$72,300	\$110,981	\$83,705	1631	3.74	61	729	756
4	Upper	No	234.13	\$72,300	\$169,276	\$127,672	4717	0.85	40	2518	508
5	Upper	No	304.02	\$72,300	\$219,806	\$165,787	1813	2.76	50	730	1135
6	Upper	No	128.83	\$72,300	\$93,144	\$70,250	1483	2.23	33	618	756
7	Low	No	49.45	\$72,300	\$35,752	\$26,964	1292	92.8	1199	124	214
101.01	Upper	No	133.24	\$72,300	\$96,333	\$72,656	6802	5.97	406	2510	2657
101.02	Middle	No	117.52	\$72,300	\$84,967	\$64,087	3542	12.03	426	1504	1712
101.03	Upper	No	122.71	\$72,300	\$88,719	\$66,913	6337	6.88	436	2260	2332
101.04	Middle	No	85.43	\$72,300	\$61,766	\$46,588	7194	19.56	1407	1946	3345
102.02	Upper	No	138.06	\$72,300	\$99,817	\$75,286	8106	9.5	770	2418	2703
102.03	Middle	No	116.91	\$72,300	\$84,526	\$63,750	5283	7.27	384	2044	1289
102.04	Upper	No	211.94	\$72,300	\$153,233	\$115,571	7383	1.68	124	3647	2393
102.05	Upper	No	179.09	\$72,300	\$129,482	\$97,662	2355	4.5	106	835	933
103	Middle	No	85.83	\$72,300	\$62,055	\$46,806	4235	22.38	948	1258	1596
104.01	Middle	No	104.84	\$72,300	\$75,799	\$57,168	3713	13.36	496	922	1074
104.05	Upper	No	124.77	\$72,300	\$90,209	\$68,039	5802	7.27	422	1774	2050
104.06	Middle	No	118.33	\$72,300	\$85,553	\$64,529	7007	10.69	749	2202	2505
104.07	Upper	No	138.25	\$72,300	\$99,955	\$75,389	6926	6.94	481	2525	3126
104.08	Middle	No	108.98	\$72,300	\$78,793	\$59,426	3147	15.28	481	877	1028
104.09	Moderate	No	78.09	\$72,300	\$56,459	\$42,582	8380	52.1	4366	1327	2166
104.1	Moderate	No	79.53	\$72,300	\$57,500	\$43,367	6469	57.86	3743	962	1721
104.11	Moderate	No	73.29	\$72,300	\$52,989	\$39,966	6102	39.99	2440	1484	1845

Exhibit P Continued – 2010 FFIEC Census Report - Demographic

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2010 HUD Est. MSA/MD non-MSA/MD Median Family Income	2010 Est. Tract Median Family Income	2000 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
104.12	Middle	No	101.22	\$72,300	\$73,182	\$55,194	6697	23.52	1575	2045	2315
104.13	Middle	No	90.32	\$72,300	\$65,301	\$49,250	3336	25.21	841	943	1064
104.14	Middle	No	103.62	\$72,300	\$74,917	\$56,507	6656	23.45	1561	1960	2152
105.02	Middle	No	91.25	\$72,300	\$65,974	\$49,760	7028	5.07	356	3347	3233
105.03	Middle	No	88.01	\$72,300	\$63,631	\$47,995	7230	13.83	1000	2769	2952
105.04	Middle	No	83.38	\$72,300	\$60,284	\$45,469	6464	26.61	1720	1725	1780
106.01	Moderate	No	73.19	\$72,300	\$52,916	\$39,911	2601	38.1	991	570	1077
106.02	Middle	No	91.44	\$72,300	\$66,111	\$49,861	3359	27.45	922	1065	1265
106.03	Middle	No	103.46	\$72,300	\$74,802	\$56,418	5699	12.46	710	2375	2166
106.04	Middle	No	80.48	\$72,300	\$58,187	\$43,889	3757	23.05	866	1156	1365
107.01	Moderate	No	64.35	\$72,300	\$46,525	\$35,091	4807	37.05	1781	1175	2081
107.02	Moderate	No	64.68	\$72,300	\$46,764	\$35,268	4162	46.32	1928	883	1493
108.01	Middle	No	105.19	\$72,300	\$76,052	\$57,361	3857	5.16	199	1578	1175
108.02	Middle	No	81.21	\$72,300	\$58,715	\$44,286	6612	72.88	4819	1161	1797
108.03	Middle	No	94.82	\$72,300	\$68,555	\$51,707	3458	14.46	500	1270	2019
109.01	Upper	No	132.95	\$72,300	\$96,123	\$72,500	4048	4.62	187	1702	1855
109.02	Middle	No	119.2	\$72,300	\$86,182	\$65,000	3377	9.15	309	1226	1669
109.03	Middle	No	112.84	\$72,300	\$81,583	\$61,534	4090	5.65	231	1609	2173
110	Upper	No	135.78	\$72,300	\$98,169	\$74,042	3698	2.35	87	1815	540
111.01	Moderate	No	72.21	\$72,300	\$52,208	\$39,375	5887	27.01	1590	1968	3903
111.02	Moderate	No	75.57	\$72,300	\$54,637	\$41,211	4213	29.48	1242	1283	2301
112.01	Upper	No	147.06	\$72,300	\$106,324	\$80,193	3384	5.41	183	1482	1674
112.02	Middle	No	94.19	\$72,300	\$68,099	\$51,361	5790	33.25	1925	1621	1868
112.04	Low	No	33.9	\$72,300	\$24,510	\$18,485	4623	96.47	4460	255	742
112.05	Low	No	34.51	\$72,300	\$24,951	\$18,819	3464	97.78	3387	170	919
113	Low	No	44.53	\$72,300	\$32,195	\$24,281	9430	89.4	8430	1239	2207
114	Moderate	No	56.69	\$72,300	\$40,987	\$30,912	4551	88.42	4024	525	996

Exhibit Q – 2010 FFIEC Census Report - Income

Tract Code	Tract Income Level	2004 MSA/MD Statewide non-MSA/MD Median Family Income	2010 HUD Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2000 Tract Median Family Income	2010 Est. Tract Median Family Income	2000 Tract Median Household Income
1	Upper	\$54,531	\$72,300	2.19	134.52	\$73,355	\$97,258	\$50,500
2	Middle	\$54,531	\$72,300	4.14	94.07	\$51,298	\$68,013	\$46,648
3.01	Upper	\$54,531	\$72,300	4.94	151.81	\$82,786	\$109,759	\$68,417
3.02	Upper	\$54,531	\$72,300	6.56	153.5	\$83,705	\$110,981	\$68,690
4	Upper	\$54,531	\$72,300	2.24	234.13	\$127,672	\$169,276	\$95,751
5	Upper	\$54,531	\$72,300	4.78	304.02	\$165,787	\$219,806	\$133,470
6	Upper	\$54,531	\$72,300	3.01	128.83	\$70,250	\$93,144	\$61,736
7	Low	\$54,531	\$72,300	33.23	49.45	\$26,964	\$35,752	\$26,324
101.01	Upper	\$54,531	\$72,300	6.1	133.24	\$72,656	\$96,333	\$55,321
101.02	Middle	\$54,531	\$72,300	9.36	117.52	\$64,087	\$84,967	\$51,298
101.03	Upper	\$54,531	\$72,300	3.92	122.71	\$66,913	\$88,719	\$54,212
101.04	Middle	\$54,531	\$72,300	7.63	85.43	\$46,588	\$61,766	\$42,564
102.02	Upper	\$54,531	\$72,300	3.84	138.06	\$75,286	\$99,817	\$52,430
102.03	Middle	\$54,531	\$72,300	6.56	116.91	\$63,750	\$84,526	\$46,750
102.04	Upper	\$54,531	\$72,300	3.26	211.94	\$115,571	\$153,233	\$94,315
102.05	Upper	\$54,531	\$72,300	2.28	179.09	\$97,662	\$129,482	\$68,393
103	Middle	\$54,531	\$72,300	6.43	85.83	\$46,806	\$62,055	\$39,966
104.01	Middle	\$54,531	\$72,300	3.82	104.84	\$57,168	\$75,799	\$49,088
104.05	Upper	\$54,531	\$72,300	3.73	124.77	\$68,039	\$90,209	\$57,399
104.06	Middle	\$54,531	\$72,300	4.99	118.33	\$64,529	\$85,553	\$60,000
104.07	Upper	\$54,531	\$72,300	4.5	138.25	\$75,389	\$99,955	\$71,951
104.08	Middle	\$54,531	\$72,300	4.56	108.98	\$59,426	\$78,793	\$60,020
104.09	Moderate	\$54,531	\$72,300	17.59	78.09	\$42,582	\$56,459	\$43,776
104.1	Moderate	\$54,531	\$72,300	12.23	79.53	\$43,367	\$57,500	\$44,098
104.11	Moderate	\$54,531	\$72,300	11.18	73.29	\$39,966	\$52,989	\$40,075
104.12	Middle	\$54,531	\$72,300	3.75	101.22	\$55,194	\$73,182	\$56,013
104.13	Middle	\$54,531	\$72,300	4.32	90.32	\$49,250	\$65,301	\$49,341
104.14	Middle	\$54,531	\$72,300	3.4	103.62	\$56,507	\$74,917	\$57,134
105.02	Middle	\$54,531	\$72,300	4.4	91.25	\$49,760	\$65,974	\$41,891
105.03	Middle	\$54,531	\$72,300	8.03	88.01	\$47,995	\$63,631	\$44,595
105.04	Middle	\$54,531	\$72,300	10.35	83.38	\$45,469	\$60,284	\$41,602
106.01	Moderate	\$54,531	\$72,300	10.05	73.19	\$39,911	\$52,916	\$37,037
106.02	Middle	\$54,531	\$72,300	5.14	91.44	\$49,861	\$66,111	\$47,539
106.03	Middle	\$54,531	\$72,300	5.71	103.46	\$56,418	\$74,802	\$45,321
106.04	Middle	\$54,531	\$72,300	12.05	80.48	\$43,889	\$58,187	\$35,536

Exhibit Q Continued – 2010 FFIEC Census Report - Income

Tract Code	Tract Income Level	2004 MSA/MD Statewide non-MSA/MD Median Family Income	2010 HUD Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2000 Tract Median Family Income	2010 Est. Tract Median Family Income	2000 Tract Median Household Income
107.01	Moderate	\$54,531	\$72,300	15.83	64.35	\$35,091	\$46,525	\$30,876
107.02	Moderate	\$54,531	\$72,300	13.82	64.68	\$35,268	\$46,764	\$33,836
108.01	Middle	\$54,531	\$72,300	6.31	105.19	\$57,361	\$76,052	\$45,170
108.02	Middle	\$54,531	\$72,300	22.23	81.21	\$44,286	\$58,715	\$43,795
108.03	Middle	\$54,531	\$72,300	11.93	94.82	\$51,707	\$68,555	\$45,065
109.01	Upper	\$54,531	\$72,300	4.99	132.95	\$72,500	\$96,123	\$61,936
109.02	Middle	\$54,531	\$72,300	3.69	119.2	\$65,000	\$86,182	\$56,532
109.03	Middle	\$54,531	\$72,300	7.48	112.84	\$61,534	\$81,583	\$51,667
110	Upper	\$54,531	\$72,300	6.14	135.78	\$74,042	\$98,169	\$63,750
111.01	Moderate	\$54,531	\$72,300	13.96	72.21	\$39,375	\$52,208	\$35,639
111.02	Moderate	\$54,531	\$72,300	7.95	75.57	\$41,211	\$54,637	\$37,368
112.01	Upper	\$54,531	\$72,300	1.83	147.06	\$80,193	\$106,324	\$71,979
112.02	Middle	\$54,531	\$72,300	5.06	94.19	\$51,361	\$68,099	\$50,474
112.04	Low	\$54,531	\$72,300	41.58	33.9	\$18,485	\$24,510	\$25,326
112.05	Low	\$54,531	\$72,300	51.85	34.51	\$18,819	\$24,951	\$18,101
113	Low	\$54,531	\$72,300	34.41	44.53	\$24,281	\$32,195	\$24,551
114	Moderate	\$54,531	\$72,300	36.83	56.69	\$30,912	\$40,987	\$34,808

Exhibit R – 2010 FFIEC Census Report – Population

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/ Two or More Races
1	3649	2.93	959	2076	3542	107	4	13	7	66	17
2	2199	9.46	600	881	1991	208	1	8	40	115	44
3.01	3532	4.33	1152	1823	3379	153	7	21	9	103	13
3.02	1631	3.74	543	788	1570	61	0	5	13	31	12
4	4717	0.85	1790	2794	4677	40	2	5	1	21	11
5	1813	2.76	569	826	1763	50	0	11	3	23	13
6	1483	2.23	495	755	1450	33	2	4	3	19	5
7	1292	92.8	305	410	93	1199	4	3	867	32	293
101.01	6802	5.97	2225	3541	6396	406	8	30	75	270	23
101.02	3542	12.03	1063	1650	3116	426	4	13	8	394	7
101.03	6337	6.88	1921	2593	5901	436	7	44	31	334	20
101.04	7194	19.56	1950	3005	5787	1407	8	62	89	1187	61
102.02	8106	9.5	2350	3374	7336	770	3	96	106	526	39
102.03	5283	7.27	1494	2869	4899	384	1	45	30	270	38
102.04	7383	1.68	2786	3891	7259	124	2	36	7	71	8
102.05	2355	4.5	664	969	2249	106	1	16	15	64	10
103	4235	22.38	1127	1869	3287	948	3	33	53	835	24
104.01	3713	13.36	1025	1705	3217	496	2	72	48	342	32
104.05	5802	7.27	1797	2485	5380	422	2	47	58	273	42
104.06	7007	10.69	2194	3208	6258	749	8	93	58	521	69
104.07	6926	6.94	2193	2675	6445	481	5	41	36	333	66
104.08	3147	15.28	869	1087	2666	481	7	43	83	329	19
104.09	8380	52.1	1960	2445	4014	4366	10	74	946	3162	174
104.1	6469	57.86	1441	1988	2726	3743	12	58	627	2885	161
104.11	6102	39.99	1567	2029	3662	2440	7	19	464	1734	216
104.12	6697	23.52	1835	2249	5122	1575	16	26	186	1249	98

Exhibit R Continued – 2010 FFIEC Census Report – Population

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/ Two or More Races
104.13	3336	25.21	869	969	2495	841	12	21	59	709	40
104.14	6656	23.45	1824	2115	5095	1561	18	33	104	1296	110
105.02	7028	5.07	2540	3690	6672	356	9	30	75	210	32
105.03	7230	13.83	2208	3324	6230	1000	8	80	75	776	61
105.04	6464	26.61	1963	2929	4744	1720	15	93	448	1076	88
106.01	2601	38.1	604	1054	1610	991	12	4	143	806	26
106.02	3359	27.45	1042	1319	2437	922	8	24	96	719	75
106.03	5699	12.46	1629	2737	4989	710	8	40	164	380	118
106.04	3757	23.05	1028	1627	2891	866	8	22	218	585	33
107.01	4807	37.05	1142	2150	3026	1781	9	27	391	1206	148
107.02	4162	46.32	1059	1536	2234	1928	4	26	471	1345	82
108.01	3857	5.16	1183	2012	3658	199	6	17	25	143	8
108.02	6612	72.88	1484	1746	1793	4819	3	15	868	3829	104
108.03	3458	14.46	1109	1708	2958	500	6	24	65	377	28
109.01	4048	4.62	1436	2033	3861	187	3	25	17	129	13
109.02	3377	9.15	1106	1448	3068	309	5	17	8	250	29
109.03	4090	5.65	1343	1828	3859	231	3	27	13	172	16
110	3698	2.35	1461	2053	3611	87	3	17	1	62	4
111.01	5887	27.01	1757	2606	4297	1590	7	22	34	1504	23
111.02	4213	29.48	1116	1617	2971	1242	29	28	129	1033	23
112.01	3384	5.41	1259	1585	3201	183	0	21	22	123	17
112.02	5790	33.25	1513	1772	3865	1925	36	16	184	1614	75
112.04	4623	96.47	827	1160	163	4460	3	19	1636	2553	249
112.05	3464	97.78	709	859	77	3387	119	3	1118	1982	165
113	9430	89.4	1933	2274	1000	8430	17	20	532	7589	272
114	4551	88.42	805	990	527	4024	5	1	240	3639	139



Exhibit S – 2010 FFIEC Census Report – Housing

Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
1	3279	1625	28	Yes	1285	1230	788	764
2	1029	966	34	Yes	737	122	711	170
3.01	2561	1563	23	Yes	1676	722	1180	163
3.02	1033	756	32	Yes	729	254	572	50
4	5636	508	21	Yes	2518	2886	375	232
5	1144	1135	23	Yes	730	328	730	86
6	1026	756	23	Yes	618	253	471	155
7	656	214	25	Yes	124	219	77	313
101.01	5482	2657	6	No	2510	1956	1696	1016
101.02	2038	1712	13	No	1504	465	1309	69
101.03	3312	2332	13	No	2260	648	1851	404
101.04	3658	3345	21	No	1946	666	1869	1046
102.02	4584	2703	4	No	2418	1213	1811	953
102.03	3818	1289	18	Yes	2044	961	978	813
102.04	8177	2393	9	No	3647	4286	1411	244
102.05	1268	933	14	No	835	280	643	153
103	2193	1596	25	Yes	1258	319	971	616
104.01	1899	1074	18	Yes	922	197	764	780
104.05	2841	2050	4	No	1774	374	1670	693
104.06	4284	2505	7	No	2202	1102	1743	980
104.07	3553	3126	5	No	2525	878	2317	150
104.08	1094	1028	13	No	877	74	877	143
104.09	2597	2166	13	No	1327	80	1327	1190
104.1	2080	1721	19	No	962	82	954	1036
104.11	2347	1845	15	No	1484	322	1343	541
104.12	2559	2315	6	No	2045	371	2039	143
104.13	1088	1064	10	No	943	64	927	81
104.14	2152	2152	8	No	1960	56	1960	136
105.02	5581	3233	9	No	3347	1906	2346	328
105.03	4322	2952	7	No	2769	1002	2061	551
105.04	4012	1780	8	No	1725	1074	1163	1213
106.01	1192	1077	25	Yes	570	215	570	407
106.02	1823	1265	16	No	1065	432	832	326
106.03	3513	2166	16	No	2375	739	1659	399
106.04	2319	1365	19	No	1156	727	828	436
107.01	2607	2081	23	No	1175	450	1059	982
107.02	1858	1493	18	Yes	883	325	806	650
108.01	2641	1175	16	No	1578	606	984	457

Exhibit S Continued – 2010 FFIEC Census Report – Housing

Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
108.02	2207	1797	5	No	1161	434	1063	612
108.03	2579	2019	15	Yes	1270	937	1095	372
109.01	4079	1855	16	Yes	1702	2068	1079	309
109.02	1904	1669	16	Yes	1226	457	1126	221
109.03	2780	2173	14	Yes	1609	954	1427	217
110	6393	540	16	Yes	1815	4348	382	230
111.01	4815	3903	14	No	1968	2216	1723	631
111.02	2820	2301	16	No	1283	1212	1091	325
112.01	2225	1674	3	No	1482	631	1211	112
112.02	1888	1868	4	No	1621	116	1605	151
112.04	1143	742	18	No	255	73	234	815
112.05	1008	919	20	No	170	50	170	788
113	2394	2207	18	No	1239	131	1239	1024
114	1045	996	24	No	525	52	525	468

Source: Federal Financial Institutions Examination Council, 2010



Exhibit T Continued – Collier County Application Rates in 2009

Ethnicity, Gender and Income	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
JOINT	25	8,961	16	3,981	2	781	5	3,947	1	150	1	102
Male	1	184	1	184								
Female												
Joint (Male/Female)	24	8,777	15	3,797	2	781	5	3,947	1	150	1	102
RACE NOT AVAILABLE	494	180,564	287	102,938	44	12,320	86	34,293	49	17,470	28	13,543
Male	46	13,311	21	6,040	8	1,801	10	3,183	5	1,538	2	749
Female	39	10,246	17	4,307	5	689	11	4,427	3	176	3	647
Joint (Male/Female)	100	36,231	65	20,674	13	4,495	8	3,665	13	6,872	1	525
HISPANIC	287	46,510	139	19,500	21	4,697	89	15,145	28	4,731	10	2,437
Male	115	16,379	57	7,829	8	1,021	34	5,370	12	1,362	4	797
Female	102	18,668	44	5,538	8	2,728	42	7,788	6	2,326	2	288
Joint (Male/Female)	70	11,463	38	6,133	5	948	13	1,987	10	1,043	4	1,352
INCOME	4,264	1,212,528	2,680	758,173	321	91,028	727	205,718	416	122,387	120	35,222
Less than 50% of MSA/MD Median	253	26,038	120	11,487	14	1,234	88	10,592	25	2,246	6	479
50-79% of MSA/MD Median	460	57,927	261	32,411	39	5,614	97	13,064	45	5,218	18	1,620
80-99% of MSA/MD Median	304	46,639	183	26,041	22	3,960	58	9,185	34	6,613	7	840
100-119% of MSA/MD Median	284	50,374	166	28,555	27	4,691	54	10,263	28	5,253	9	1,612
120% or more of MSA/MD Median	2,884	992,486	1,928	650,067	214	72,820	419	158,028	270	94,241	53	17,330
Income not available	79	39,064	22	9,612	5	2,709	11	4,586	14	8,816	27	13,341

Source: Home Mortgage Disclosure Act Aggregate Report, 10/24/2010