

# Analysis of Impediments to Fair Housing Choice

St. Charles County, Missouri

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## Executive Summary

Each year, the U.S. Department of Housing and Urban Development (HUD) requires Community Development Block Grant (CDBG) entitlement grantees, such as St. Charles County, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Local entitlement communities meet this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI) within their communities and developing and implementing strategies and actions to overcome any impediments to fair housing choice based on their history, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, to include Protected Classes, as well as provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. St. Charles County staff worked together with WFN Consulting to perform this analysis.

## Historical Overview

St. Charles County, Missouri has recently become one of the most sought after communities in the United States. Recognized for western expansion by the adventures of the Lewis and Clark Expedition, as well as the settlement by frontiersman Daniel Boone, St. Charles County’s history is steeped in rich American tradition and folklore. Located at the confluence of the Mississippi River and Missouri River, St. Charles County has a diverse terrain covering 561 square miles.

Today St. Charles County is recognized as the third largest county in Missouri, representing 6.2% of the state’s economy.<sup>1</sup> With some of the lowest taxes in the Midwest and one of the lowest unemployment rates in Missouri, St. Charles County is home to employers such as Citi, MasterCard Worldwide, Boeing, General Motors, and Enterprise Holdings. There are eight data centers located on the “high tech” corridor providing metro St. Louis with one of the largest concentrations of IT facilities. In 2010, *Money Magazine* placed local communities O’Fallon and St. Peters in the 100 Best Places to Live in America.<sup>2</sup>

## Demographics

The St. Charles “urban county” (a term used by HUD to describe the jurisdictions together receiving grant funds and consisting of unincorporated St. Charles County and the jurisdictions of Cottleville, Dardenne Prairie, Lake St. Louis, St. Paul, St. Peters, Weldon Spring and Wentzville) had a combined total 2010 Census population of 212,549, while St. Charles County as a whole (which would include the cities of St. Charles and O’Fallon) had a total 2010 Census population of 360,495. St. Charles County experienced population growth of nearly 1% between 2010 and 2011, while surrounding jurisdictions held relatively steady or lost population.

The major racial groups in St. Charles Urban County, based upon the 2006-2010 ACS estimates, consist of 93.8% white, 3.5% black or African American and 1.9% Asian. 2.4% of the urban county population is

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<sup>1</sup> *Fast Facts*. St. Charles County Economic Development Center. <[http://www.edcsc.com/why\\_fast-facts.htm](http://www.edcsc.com/why_fast-facts.htm)>

<sup>2</sup> *Competitive Advantages*. St. Charles County Economic Development Center. <[http://www.edcsc.com/why\\_competitive.htm](http://www.edcsc.com/why_competitive.htm)>

Hispanic or Latino. The County has the highest median household income and the second highest mean household income in the St. Louis MSA.

One of the more significant demographic changes in St. Charles County is the growth in population falling into the 45-69 age group. Growth in this age group has resulted in the addition of 42,500 new residents representing 55% of the county's increase in population between 2000 and 2010.

### Economic Analysis

According to the 2010 Census, the median family income in St. Charles County was \$82,226, and the median household income was \$70,331. Males had median earnings of \$58,455 compared to \$40,192 in median earnings for females. By comparison, the median family income in 2010 was 28% higher than its level in the year 2000 at \$64,415. Also, the median household income in 2000 was \$57,258.00, showing 23% growth in 10 years.

The unemployment rate in St. Charles County more than doubled from 2007 to 2009 as job growth slowed and the economy fell into recession. At its highest point during 2009, the area's unemployment rate stood at 8.7%, lower than the national rate of 9.3%. The unemployment rate in 2007 was 4.0%. According to the 2010 Census, 3.3% of families and 5.0% of all residents of St. Charles County fell below the poverty line. Both of these numbers fall below those of the State of Missouri, which saw 10.0% of all families and 14.0% of all people fall below the poverty level. Of all children under the age of 18, 3.4% lived in poverty, while 3.9% of residents over the age of 65 lived in poverty.

St. Charles County's workforce is comprised of 87.1% private wage and salary workers, 8.8% government workers, 3.9% self-employed business owners, and 0.2% unpaid family workers. The largest sector of the workforce in St. Charles County is educational services, health care and social assistance, making up 19.2% of the total workforce.

### Public Schools

The public school system within St. Charles County consists of five separate districts: Francis Howell, Ft. Zumwalt, Orchard Farm, St. Charles City, and Wentzville. St. Charles City Schools are excluded from analysis here, as the City of St. Charles is not part of the urban county. The Missouri AYP Summary 2011<sup>3</sup> reported there is currently a total of 12 schools; 2 within the Francis Howell District, 6 within the Ft. Zumwalt District, 3 within the Wentzville District, and 1 within the Orchard Farm District, that are considered Title 1 schools. A Title 1 schools is defined as a school that meets the criteria to receive federal funds due to having a high percentage of low-income students who are at risk of not meeting their state's academic standards. According to the Missouri Board of Education, in 2011, the graduation rate was above the state average rate for each district. The Missouri state average for 2011 is 87.0%. The Cohort Dropout ranged from less than 1% to 3.8% across all the analyzed school districts within the County. The state average is 3.4% for 2011, which was only exceeded by the Orchard Farm district at 3.8%.

### Protected Class Analysis

Historically, the non-Hispanic White Population has been the majority in St. Charles County. Over the past decade, the percentage of non-Hispanic White Population has decreased minimally by about 3%. The Black/African American population has grown along with the total population of St. Charles County, but the percentage of the population has remained consistent. The largest growth in St. Charles County over the past decade has been in the Black/African American population. Although this population has increased

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<sup>3</sup> "Missouri AYP Summary 2011," Missouri Department of Elementary and Secondary Education. <http://mcde.se.mo.gov>

steadily since 2000, it still only makes up 4.3% of the total population according to the 2011 ACS Estimates. Minorities make up approximately 9.7% of the population in the County. The largest percentage of minorities are located in Census Tracts 3110.03 (21.9%), 3105.01 (19.4%), and 3110.04 (19.1%). These Census tracts are all entirely or partially within the City of St. Charles, which is not part of the urban county.

The proportion of males versus females in St. Charles County has remained largely the same since 2000. The following table shows in 2011, the average concentration of males in the County is 49.1%, and the average concentration of females in the County is 50.9%.

The census data between 2000 and 2010 shows small fluctuations in the makeup of families throughout St. Charles County. The percentage of families with children have fallen approximately 6% while there have been increases in the number of non-family households and those living alone.

According to the 2009 ACS 3-Year Estimates for St. Charles County, 3.4% of the population was born in foreign countries. The majority of the foreign born population is from Asia as this population makes up 43.6% of the foreign born population while Latin Americans make up 22.3% of the foreign born population.

The 2009-2011 ACS estimates show that approximately 10% of the County's civilian, non-institutionalized population aged 5 to 65 was disabled. The U.S. Census Bureau has frequently varied its definition and methodology for calculating the number of persons with disabilities, making it difficult to compare data over multiple years.

### Fair Housing Education

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. In general, fair housing services can typically include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. St. Charles County itself does not have any organizations dedicated to providing fair housing education to the general public; however, the Diversity Awareness Committee of the St. Charles County Association of Realtors promotes diversity within the real estate profession, advocates for fair and equal access to residential and commercial real estate, and informs and educates about the value of diversity.

A Fair Housing Survey was conducted in conjunction with this analysis, receiving 182 total responses. When respondents were asked if they had ever experienced housing discrimination, only 6 of 111 respondents (5.4%) stated they had. Of the 6 survey respondents who reported that they had been discriminated against, 3 of the respondents stated that a landlord or property manager had discriminated against them and 3 reported that a City staff person discriminated against them, and 1 person indicated that a neighbor discriminated against them. Additionally, out of the 6 survey respondents who had experienced discrimination 2 [33%] actually filed a fair housing complaint.

### Fair Housing Complaints

Housing discrimination complaints in St. Charles County may be filed with HUD, the Missouri Commission on Human Rights, the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC), or with the County's own Community Development Department. From January 1, 2007 to January 19, 2012 there were

64 housing complaints filed with HUD regarding housing in St. Charles County. Of these complaints, 21 were determined to have cause and 5 were settled through conciliation. A total of 11 of the “with cause” complaints were withdrawn after resolution. The overwhelming majority of complaints investigated by HUD for St. Charles County were based on color or race and disability status, respectively at 52% and 48% of the total types of Protected Class complaint filings.

Over a similar period of time (January 1, 2007 and September 31, 2012), 29 complaints were filed with the EHOC. Among the complaints received by EHOC, allegations of discrimination based on disability status were the most common (10 complaints). Discrimination with regard to race and color ranked second (8 complaints), “other” complaints (such as national origin and familial status) followed at 6 and 3 complaints, respectively. Between January 1, 2007 and September 31, 2012, no fair housing complaints were filed with the County’s Department of Community Development. The Missouri Commission on Human Rights was unable to provide complaint data in time to be included in this analysis.

### Home Mortgage Disclosure Act (HMDA) Analysis

Based on the 2011 HMDA analysis, there is little data to suggest potential discrimination against minorities in the local mortgage market. Of six tracts with the highest minority populations, all but one (tract 105 in the City of St. Charles) had loan denial rates in the normal range. Of four tracts with the lowest minority populations, three had normal denial rates and one (tract 101 in the West Alton area) had a higher than average denial rate.

Of five tracts with high denial rates, only one (again, tract 105) also had a higher than average minority population; notably, this tract also had a low median income which could be a significant factor in the high denial rate. Of five tracts with unusually low denial rates, all had minority percentages in the average range and three had median incomes within the average. The other two low denial rate tracts had higher than average median incomes. The tract with the highest rate of loan denials (tract 115 in the Dardenne Lake area) had an average percentage of minorities and an average median income. Conversely, the tract with the lowest rate of loan denials (tract 109.03 in the City of St. Charles) also had an average percentage of minorities and an average median income.

### Affordable Housing Snapshot

Housing affordability is a significant factor for residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30 percent of a family's income<sup>4</sup>. Households that spend over that threshold tend to lack affordable housing and may be significantly cost burdened and may have difficulty affording basic necessities.

As of the 2010 Census, St. Charles County had a total of 141,016 housing units, of which 6,742 [4.8%] were vacant, a significant increase from 2000. As indicated by the 2000 Census figures, St. Charles County only had 105,514 housing units, of which 3,851 [3.6%] were vacant. The rate of housing vacancy has varied in St. Charles County since 1980, with the lowest vacancy rate noted in 2000 at 3.6%. The highest rate of vacancy was 6.2% in 1980.

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<sup>4</sup> U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>



According to the 2011 ACS, the median value for a home in St. Charles County was \$185,500 with 34,537 [31.7%] homes ranging in value between \$150,000 and \$199,999. The second most common range of home values was \$100,000 to \$149,999, comprising 20% of all owner-occupied units. Approximately 44,961 [41.2%] of all homes within the County were valued at over \$200,000.

According to the 2011 ACS, 26.5% of homeowners with a mortgage pay more than 30% of their income on monthly housing costs. Conversely, 39.8% of renters spent more than 30% of their income on rent. The National Low Income Housing Coalition's "Out of Reach" 2012 Annual Report calculates the amount of money a household must earn in order to afford a rental unit at the Fair Market Rent (FMR), consistent with HUD's affordability standard of paying no more than 30% of income for housing costs.

In order to afford the current FMR for a two-bedroom apartment in St. Charles County, a minimum wage worker who earns an hourly wage of \$7.25 must work 84 hours per week, for 52 weeks per year or must have a household consisting of 2.1 minimum wage earners. The affordability data for three-bedroom units indicate more significant cost burdens. A minimum wage worker must work 108 hours per week or have a household consisting of 2.7 minimum wage earners to afford the current FMR for a three-bedroom apartment. A full 42% of County residents are unable to afford a two bedroom rental unit at the fair market rent as assessed by HUD.

## Infrastructure

Public transportation can play a significant role in increasing access to the supply of affordable housing to groups in need and others protected under fair housing laws. But if public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities.

Except for bus service within the City of St. Charles, there is no public transit system within St. Charles County and the participating jurisdictions within the urban county. A St. Charles County Transit Plan for Intra-County Bus Service was presented to the St. Charles County Council on August 7, 2007, but the Council has taken no action on this proposed plan for transit service.

While St. Charles County does not operate a public transit system, other transportation modes exist, such as driving, carpooling, biking and walking. The most common choice for commuting to work is driving alone. According to the 2010 American Community Survey estimates, 93.9% of workers using a private automobile for daily transportation to work from within St. Charles County.

There are currently five providers of water and sewer services to residents of St. Charles County. Together, these providers ensure that an adequate supply of water and sewer services is provided throughout the County. The assessment of St. Charles County's water and sewer infrastructure did not reveal any impediments to fair housing, as the range of service providers creates a healthy level of competition and provide residents options.

## Land Use & Zoning

Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that decisions regarding land use and zoning can have profound impact on affordable housing and fair housing choice.

After review and examination of local land use and zoning regulations, it is apparent that some municipal ordinances impose restrictions that constitute impediments to fair housing choice. Roughly 86% of the county's land area is governed by St. Charles County's relatively inclusive and permissive zoning codes. However, the zoning codes of Weldon Spring and Dardenne Prairie pose an impediment to the housing choice of those persons with disabilities who must live in group homes by requiring special permits for such residences to be located in residential areas and by mandating unreasonable spacing requirements. Lake St. Louis imposes a lower spacing requirement, but, like Weldon Spring and Dardenne Prairie does not permit group homes to be located as of right in any residential zones. These three municipalities also have high minimum square footage requirements (ranging from 1,500 to 2,000 square feet) for single family dwellings.

Building codes and subdivision regulations in St. Charles County are generally compliant with federal laws related to fair housing and accessibility for people with disabilities. Several different bodies bear responsibility for interpretation and enforcement of zoning and land use regulations. There have been no official complaints made against members of these bodies or with regard to the actions and decision taken by them.

## Current Impediments and Recommendations

This analysis has revealed impediments to fair housing choice in St. Charles County. In this section, the four overarching impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. St. Charles County has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

### **Impediment #1: Scarcity of Affordable Rental Units**

The affordability of housing in St. Charles County is a pressing concern among residents. Because demand for affordable rental units exceeds supply, vacancy rates are extremely low, allowing property owners to increase rents. The National Low Income Housing Coalition's data finds that 42% of renters in St. Charles County lack the income required to afford a two-bedroom apartment. Earning minimum wage, a resident would need to work 84 hours per week to afford a two-bedroom apartment. As cost tends to restrict housing choice, particularly for those with lower incomes, this cost burden impacts a household's ability to obtain affordable housing. Renters with incomes below 30% AMI (which includes those receiving SSI as their sole source of income) are especially impacted, as are large families who seek units with four or more bedrooms, as these units are generally more expensive. Additionally, stakeholder interviews conducted in conjunction with this Analysis indicate large numbers of residents living week-to-week in area hotels, either unable to accumulate the funds necessary for apartment deposits or unable to locate apartment

vacancies in convenient areas. The lack of an adequate supply of housing affordable to the county's workforce can cause many service-sector and even some professional-sector workers to live long distances from the places they work, resulting in long commute times and inordinate strain on the County's infrastructure systems.

**Recommendations:**

St. Charles County must actively work to address the need for more affordable rental housing by shifting some CDBG funding priorities from homeowner-oriented programs to programs supporting the creation and preservation of rental units or to programs making existing rental units more affordable to low-income households. To facilitate such a shift, the County should include in its 2014-2016 Consolidated Plan resources for a rental assistance activity. The County should consider opportunities to support Low Income Housing Tax Credit (LIHTC) projects proposed by developers in the County, either through letters of endorsement or the investment of CDBG funds, to the extent a nominal investment of CDBG funds may make a project application more competitive.

As the housing market begins to recover, a number of means are available to incentivize market-rate housing developers to incorporate affordable units in their developments that do not require any direct investment of County funds. Current County ordinance already provides some such opportunities, but a review of other additional concepts (such as inclusionary zoning provisions, waivers of water/sewer tap fees, and reduced setbacks), should be evaluated by County staff for feasibility.

**Impediment #2: Local Attitudes Resisting Fair Housing Opportunities**

Evidence gathered from interviews, public meetings, and survey responses suggests a strong "Not In My Backyard" (NIMBY) attitude held by some St. Charles County residents. In the course of this Analysis, the NIMBY position was found in response to a wide variety of housing types, including multi-family housing, group homes, housing options for the homeless, and affordable housing in general. While it is important for citizens to be consulted in land use decisions in their communities, it is equally important that those citizens be knowledgeable of fair housing law. Where a residential land use is proposed in a residential area, it is problematic to yield to local resistance based on the type of people who will occupy the proposed housing.

Education and awareness of fair housing law is imperative to alleviating NIMBYism and discriminatory attitudes and should be an ongoing activity if it is to begin addressing the lack of general awareness concerning fair housing issues among residents and professionals in St. Charles County. As the County continues to grow and expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns. Additionally, fair housing education must be presented in a manner that is linguistically appropriate and culturally sensitive.

**Recommendations:**

To combat the negative attitudes of some County residents toward various types of fair and affordable housing, the County must begin implementing a systematic model of fair housing education, beginning with the County's Community Development staff and CDBG subrecipients. The County should collaborate with

its FHEO and/or with local fair housing advocacy organizations on the development of an appropriate curriculum and then make it a mandatory requirement for staff, subrecipients, and any other entities the County may contract with under its CDBG program. Over time, the training program should be expanded and offered to the public, by holding workshops or by sending speakers to club meetings and other gatherings. Observance of Fair Housing Month each April is encouraged and should include a proclamation from County Council, a press release and an event drawing attention to the issue. The County should additionally consider setting aside a portion of its annual CDBG allocation as a fair housing grant, to be competitively awarded to nonprofits or other organizations that can assist the County in carrying out these recommendations.

### **Impediment #3: Restrictive Zoning for Group Homes**

An examination of local land use and zoning regulations finds that some municipal ordinances impose overly-restrictive conditions on the siting of group homes. Roughly 86% of the county's land area is governed by St. Charles County's relatively inclusive and permissive zoning codes. However, the zoning codes, for example, of Weldon Spring and Dardenne Prairie pose an impediment to the housing choice of those persons with disabilities who must live in group homes by requiring special permits for such residences to be located in residential areas and by mandating unreasonable spacing requirements. Lake St. Louis imposes a lower spacing requirement, but, like Weldon Spring and Dardenne Prairie does not permit group homes to be located as of right in any residential zones. The administrative burden required for the granting of a special use permit varies among the jurisdictions, but can be so cumbersome and costly as to prevent many would-be applicants from ever applying and instead seeking to locate elsewhere. These zoning regulations pose a significant impediment to fair housing choice for some St. Charles County residents with mental or physical disabilities.

### **Recommendations:**

It is recommended that the County convene a discussion among its key community stake holders of the effects of its own ordinance and the ordinances of the other jurisdictions making up the "urban county" on the location of group homes. To prepare for such a discussion, an examination of the market value of adjacent housing to group homes, legal issues and other considerations should be accomplished which would provide factual information on accommodating group homes.

### **Impediment #4: Lack of Public Transportation Options**

Transportation links are essential components to successful fair housing. The issue at hand regarding transportation and fair housing choice revolves around the ease with which a resident can travel from home to work if he or she lives in a lower income area or an area of minority concentration. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas and disproportionately affect low-income, disabled, and elderly residents.

Except for bus service within the City of St. Charles, there is no public transit system serving St. Charles County and the participating jurisdictions within the urban county. A St. Charles County Transit Plan for

Intra-County Bus Service was presented to the St. Charles County Council on August 7, 2007, but County Council has taken no action on this proposed plan for transit service.

**Recommendations:**

The County's Community Development Department should routinely review transportation planning efforts carried out by other County departments, the regional council of governments, and other planning bodies for opportunities to advocate public infrastructure improvements that align with the goal of expanding housing choice. Once the public and political support for a public transportation system emerges, it will be important for the County to heavily consult potential users in the design of the system, so as to be responsive to needs in terms of destinations and hours of operation.

While inherently limited by the amount of funding available, the County is making a positive step in the right direction with its CDBG-funded transportation programs for elderly, disabled, and low-income residents within St. Charles County participating jurisdictions. Funding and support for these programs should be continued.

**Conclusion**

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified which restrict the housing choice available to residents of St. Charles County and further prevent them from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. St. Charles County will work diligently toward achieving Fair Housing Choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. The County has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice. Implementation of the recommendations can assist St. Charles County in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.

## Introduction

Each year, the U.S. Department of Housing and Urban Development (HUD) requires Community Development Block Grant (CDBG) entitlement grantees, such as St. Charles County, to submit a certification that they will affirmatively further fair housing, and that their grants will be administered in compliance with Title VI of the Civil Rights Act of 1968 and the Fair Housing Act as amended in 1988, which prohibit discrimination in all aspects of housing, including the sale, rental, lease or negotiation for real property.

Title VIII of the Civil Rights Act of 1968, as amended, commonly known as the Fair Housing Act, prohibits discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing<sup>5</sup>.

Local entitlement communities meet this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI) within their communities and developing and implementing strategies and actions to overcome any impediments to fair housing choice based on their history, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, to include Protected Classes, as well as provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. St. Charles County staff worked together with WFN Consulting to perform this analysis.

By taking actions that address the impediments, HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through this process, St. Charles County promotes fair housing choices for all persons, to include Protected Classes, as well as provides opportunities for racially and ethnically inclusive patterns of housing occupancy, identifies structural and systemic barriers to fair housing choice, and promotes housing that is physically accessible and usable by persons with disabilities.

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<sup>5</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) Program grantees to document AFFH actions in the CDBG and Comprehensive Housing Affordability Strategy (CHAS) annual performance reports that are submitted to HUD.

## Definitions & Data Sources

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### Definitions

**Affirmatively Further Fair Housing** - As defined in The Fair Housing Planning Guide, the definition of “Affirmatively Further Fair Housing” (AFFH) requires a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintain records reflecting the analysis and actions taken in this regard<sup>6</sup>.

**Certification** - As described in The Fair Housing Planning Guide, the CHAS statute at Section 104(21) defines the term “certification” within the context of the Certification to Affirmatively Further Fair Housing (AFFH) to be:

- A written assertion
- Based on supporting evidence
- Available for inspection by the Secretary, the Inspector General and the public
- Deemed accurate for purposes of this Act unless the Secretary determines otherwise after:
  - Inspecting the evidence
  - Providing due notice and opportunity for comment<sup>7</sup>.

**Fair Housing Choice** - In carrying out its local Analysis of Impediments to Fair Housing Choice, St. Charles County utilized the following definition of “Fair Housing Choice” as outlined by HUD:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

**Impediments to Fair Housing Choice** - As defined in The Fair Housing Planning Guide, the definitions of impediments to fair housing choice include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.<sup>8</sup>

**Protected Classes** - In carrying out its local Analysis of Impediments to Fair Housing Choice, St. Charles County utilized the following definition of Protected Classes:

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<sup>6</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 14)*. March 1996.

<sup>7</sup> Ibid. Page 16.

<sup>8</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Page 26)*. March 1996.



- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

**Affordable** - Though different entities may define “affordable” differently, the definition used throughout this analysis is congruent with HUD’s definition:

- The U.S. Department of Housing and Urban Development (HUD) defines "affordable" as housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.
- Rental housing affordable to a low-income family of four (income up to 80% of the area median income) residing in St. Charles County would carry a total monthly cost of up to \$1,408 as noted by the National Low Income Housing Coalition’s 2012 *Out of Reach* data.

### Data Sources Used in This Analysis

**Census Data** – Data collected by the Decennial Census for 2010, 2000, and 1990 is used in this Analysis (Census 1990 data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- Summary File 1 (SF 1) – This dataset contains what is known as “100 percent data”, meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income.
- Summary File 3 (SF 3) – Containing sample data from approximately one in every six US households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.
- 1990 Census Summary Tape File 1 (STF 1) – Comparable to the 2010 and 2000 SF 1, this dataset contains “100 percent data” collected from every household that participated in the 1990 Census and is not based on a representative sample of the population. Only basic characteristics such as age, sex, and race are contained in this dataset.
- 1990 Census Summary Tape File 3 (STF 3) – Comparable to the 2000 and 2010 SF 3, this dataset contains sample data from the approximately one in every six US households who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value.

**American Community Survey (ACS)** – The American Community Survey is a relatively new component of the Decennial Census program that collects population and housing data every year, thus providing

communities with more current data throughout the 10 years between censuses. ACS data is compiled from an annual sample of approximately 3 million addresses. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS 1-Year Estimates – Based on data collected between January and December of a given year, these single-year estimates represent the most current information available from the US Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS 3-Year Estimates – More current than Decennial Census data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. It contains data collected over a 36-month span and is published for geographic areas with populations of 20,000 or greater.
- ACS 5-Year Estimates – Though the least current of all the ACS Estimates, this dataset has the advantage of being the most reliable and the most widely available set of estimates. When a high degree of precision is important or when analyzing data for geographies with populations under 20,000, the ACS 5-Year Estimates are used. The estimates are derived from data collected over a 60-month period.

**Federal Financial Institutions Examining Council (FFIEC)** – The FFIEC collects and publishes certain data used in connection with federal reporting responsibilities under the Home Mortgage Disclosure Act and the Community Reinvestment Act.

- FFIEC 2011 Census Reports – All FFIEC Census Reports from 2003 forward are based upon Census 2000 data while the FFIEC's Census Reports prior to 2003 are based on Census 1990 data. While most data fields in the 2011 Reports contain Census 2000 figures, some fields contain more current estimates that are arrived at through data processing by other federal agencies (most notably, a 2011 Estimated Median Family Income both by MSA and by census tract is provided by HUD, using HUD's own, independent data processes).
- Home Mortgage Disclosure Act (HMDA) Data – Financial institutions subject to the HMDA (including banks, credit unions, and other mortgage lenders) must annually submit certain mortgage loan data to the FFIEC. The FFIEC aggregates and publishes the data. The most current HMDA data used in this Analysis is based on loan records from the 2011 calendar year.

**Stakeholder Surveys** – a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

- St. Charles County Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from St. Charles County residents and non-residents. The survey consisted of 35 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 177 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey

respondents is cited in this Analysis, it refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full 177 survey respondents. Surveys were received over a 25-day period, from October 23, 2012 to November 16, 2012. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent “ballot stuffing”, the SurveyMonkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists. A Spanish translation of the same survey was also made available in hard copy and online. This survey received five responses.

**Stakeholder Interviews** – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers and social service providers), organizations serving people with disabilities, county and municipal staff, and fair housing advocates. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

**Public Meetings** – Two public meetings were held in order to provide a forum for St. Charles County residents and other interested parties to contribute to this Analysis. These meetings were held at 3:00 pm and 6:00 pm on Wednesday, October 24, 2012 at the Spencer Road Library, centrally located in St. Peters, providing a variety of options for residents to attend. These meetings were advertised via a flyer, a press release and an email announcement distributed using various email distribution lists. Nonprofits receiving the flyers were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

## Limitations of this Analysis

The following information, herein defined as the St. Charles County Analysis of Impediments to Fair Housing Choice, was prepared for the purposes as previously described. Therefore, this report seeks to identify impediments and develop a Fair Housing Action Plan of proposed solutions. Many of the impediments identified in this report will require additional research and on-going analysis by St. Charles County, its municipalities, local community task forces, or local nonprofit organizations. This report does not constitute a comprehensive planning guide; it simply provides analysis as to the current situation and prepares a plan of action to ameliorate existing impediments.

## Historical Overview of St. Charles County

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St. Charles County, Missouri has recently become one of the most sought after communities in the United States. Recognized for western expansion by the adventures of the Lewis and Clark Expedition, as well as the settlement by frontiersman Daniel Boone, St. Charles County's history is steeped in rich American tradition and folklore. Located at the confluence of the Mississippi River and Missouri River, St. Charles County has a diverse terrain covering 561 square miles.

In 1769, Louis Blanchette established the first settlement in what is now called St. Charles County. As the area became settled from land grants given by the Spanish, he named the area "Les Petites Cotes" meaning The Little Hills.<sup>9</sup> In 1791, settlers of the Hills sought permission to build a church. The Church called the area San Carlos after St. Charles Borromeo, an archbishop and cardinal. On October 1, 1812, San Carlos was anglicized to St. Charles County by Governor William Clark. During that time, St. Charles County was borderless, defined from the Mississippi River on the south and east, British possession to the north, and the Pacific Ocean on the west. Over time, as bordering counties were defined, St. Charles was reduced to its present day boundaries, which have remained unchanged since 1818.<sup>10</sup> In 1821, Missouri entered the Union as the 24<sup>th</sup> state and St. Charles was declared its temporary capital for the next five years.<sup>11</sup> In the 1830s, a vast German migration into St. Charles began. German influences in architecture and culture could be seen up until the 20<sup>th</sup> Century. In 1894, the Missouri Kansas and Texas Railroad was completed traversing St. Charles County and in 1956, construction of Interstate 70 commenced.

Today St. Charles County is recognized as the third largest county in Missouri, representing 6.2% of the state's economy.<sup>12</sup> With some of the lowest taxes in the Midwest and one of the lowest unemployment rates in Missouri, St. Charles County is home to employers such as Citi, MasterCard Worldwide, Boeing, General Motors, and Enterprise Holdings. There are eight data centers located on the "high tech" corridor providing metro St. Louis with one of the largest concentrations of IT facilities.

In 2010, *Money Magazine* placed local communities O'Fallon and St. Peters in the 100 Best Places to Live in America.<sup>13</sup> St. Charles County is a popular tourist site in metro St. Louis with 10 million visitors each year to the Ameristar Casino Resort Spa. The Historic Main Street, ten-blocks long and 200 years old, in the City of St. Charles is Missouri's first and largest historic district and one of the largest in the United States. The Weinstrasse, or Missouri Wine Road, is home to the highest concentration of wineries in the state. Based on the Council for Community and Economic Research, St. Charles is considered to have the second lowest cost of living in Missouri. St. Charles County's five public school districts rank in the top 25% of all Missouri districts.

St. Charles County is managed by a County Executive and a County Council which is composed of seven members elected by the voters in various districts in the county.<sup>14</sup> The County Council members serve a four year term, with the term beginning in January. County Council meetings are held twice a month.

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<sup>9</sup> *St. Charles County History*. St. Charles County Historical Society. 2012. <<http://scchs.org/research/indexes/history.html>>

<sup>10</sup> Bryan, William S. (1993). *St. Charles Co., Missouri: biographical sketches from pioneer families of Missouri* by Bryan and Rose. Baltimore, Maryland: Genealogical Publishing Company, pp.1.

<sup>11</sup> *Local History Time Line*. St. Charles City-County Library District. < <http://www.youranswerplace.org/local-history-time-line>>

<sup>12</sup> *Fast Facts*. St. Charles County Economic Development Center. <[http://www.edcsc.com/why\\_fast-facts.htm](http://www.edcsc.com/why_fast-facts.htm)>

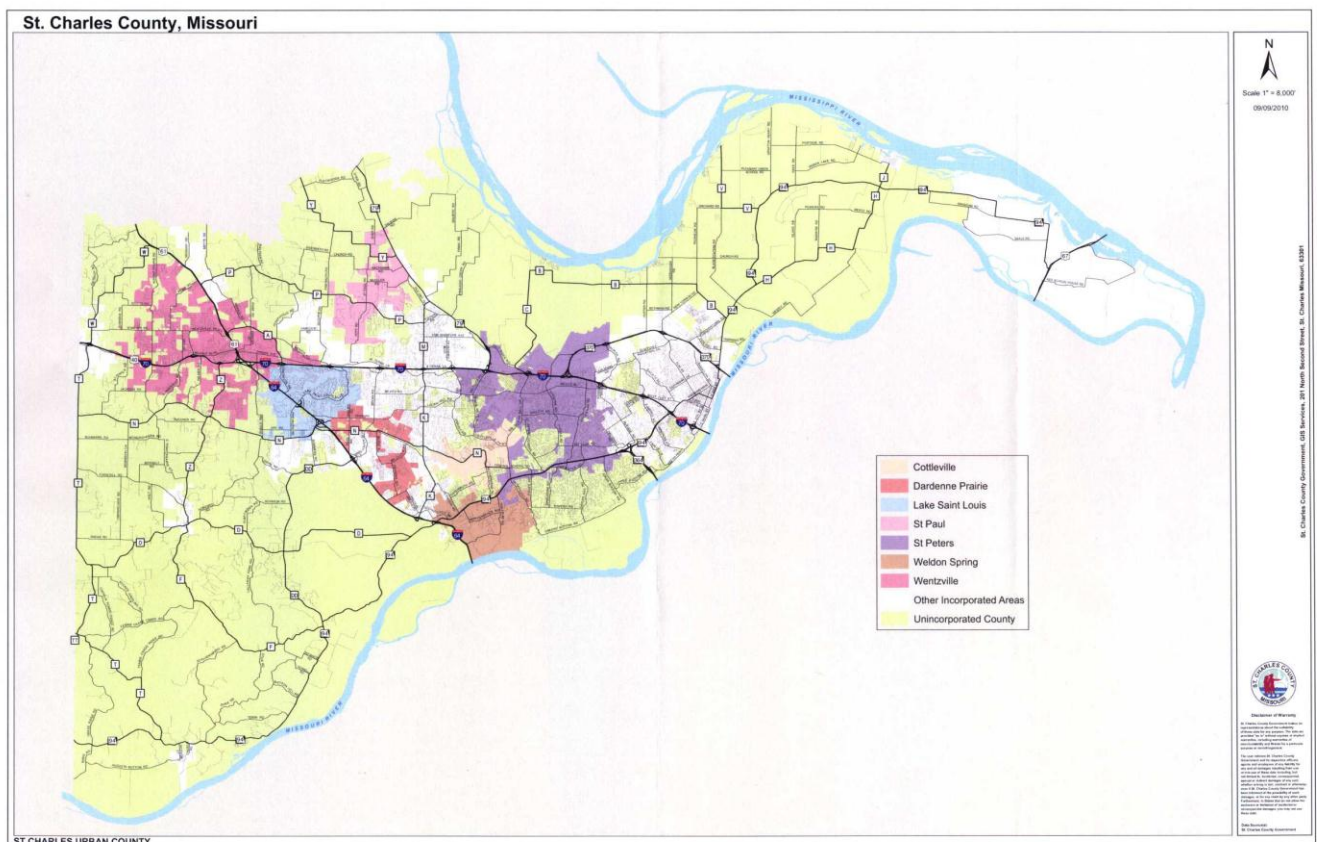
<sup>13</sup> *Competitive Advantages*. St. Charles County Economic Development Center. <[http://www.edcsc.com/why\\_competitive.htm](http://www.edcsc.com/why_competitive.htm)>

<sup>14</sup> *City Council*. St. Charles County, Missouri.2011. <<http://council.sccmo.org/council/>>

## Demographics

St. Charles County has qualified as an “urban county” consisting of unincorporated St. Charles County and the jurisdictions of Cottleville, Dardenne Prairie, Lake St. Louis, St. Paul, St. Peters, Weldon Spring and Wentzville. The cities of St. Charles and O’Fallon are not included within the “urban county” and receive CDBG funding directly from HUD. Other small jurisdictions are also not included. Figure 1 depicts the participating jurisdictions within the urban county. Depending on the availability and practicality of certain datasets, some portions of this analysis rely upon data for the county overall, while some rely more narrowly on data only for the “urban county”. The numbers between the two will vary somewhat due to the nature of the tabulations.

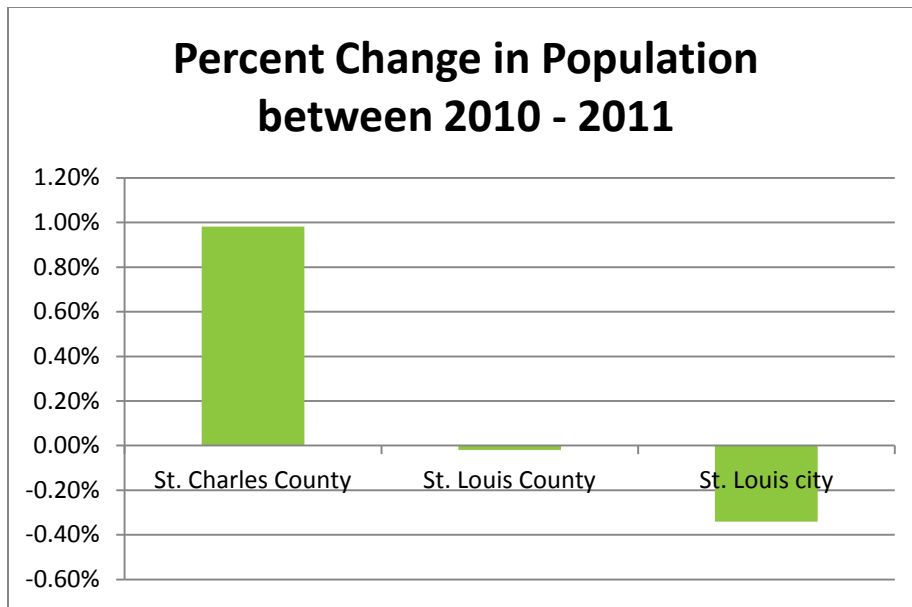
**Figure 1: Participating Jurisdictions in St. Charles Urban County**



Source: St. Charles County Department of Community Development

The “urban county” had a combined total 2010 Census population of 212,549, while St. Charles County as a whole had a total 2010 Census population of 360,495. As displayed in the chart below, St. Charles County experienced population growth of nearly 1% between 2010 and 2011, while surrounding jurisdictions held relatively steady or lost population.

**Figure 2: Comparison for St. Charles County, St. Louis County, and St. Louis City**



The major racial groups in St. Charles Urban County, based upon the 2006-2010 ACS estimates, consist of 93.8% white, 3.5% black or African American and 1.9% Asian. 2.4% of the urban county population is Hispanic or Latino. See Table 1.

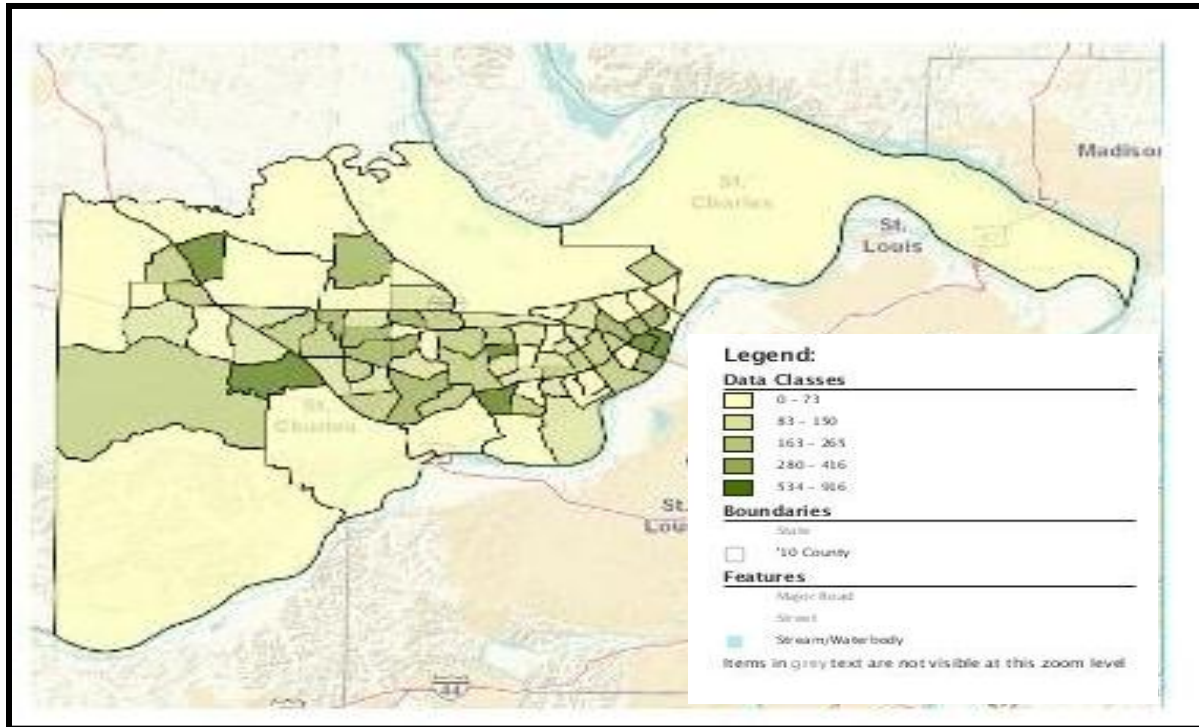
**Table 1: St. Charles County Race/Ethnicity**

**St. Charles County "Urban County"  
Race/Ethnicity**

RACE		Percentage
Total population	207222	
One race	203733	98.3%
Two or more races	3489	1.7%
One race	203733	
White	191166	93.8%
Black or African American	7218	3.5%
American Indian and Alaska	314	0.2%
Asian	3874	1.9%
Native Hawaiian and Other	104	0.1%
Some other race	1057	0.5%
<b>HISPANIC OR LATINO AND RACE</b>		
Total population	207222	
Hispanic or Latino (of any race)	4889	2.4%
Not Hispanic or Latino	202333	97.6%
White alone	188188	93.0%
Black or African American alone	7150	3.5%
American Indian and Alaska	238	0.1%
Asian alone	3806	1.9%
Native Hawaiian and Other	52	0.0%
Some other race alone	74	0.0%
Two or more races	2825	1.4%

The concentration of Black or African American residents by census tract is displayed in the figure below. Note that the cities of St. Charles and O'Fallon are not included within the "urban county" and thus are not depicted on the map.

**Figure 3: Black or African American by Census Tract**



2006-2010 American Community Survey

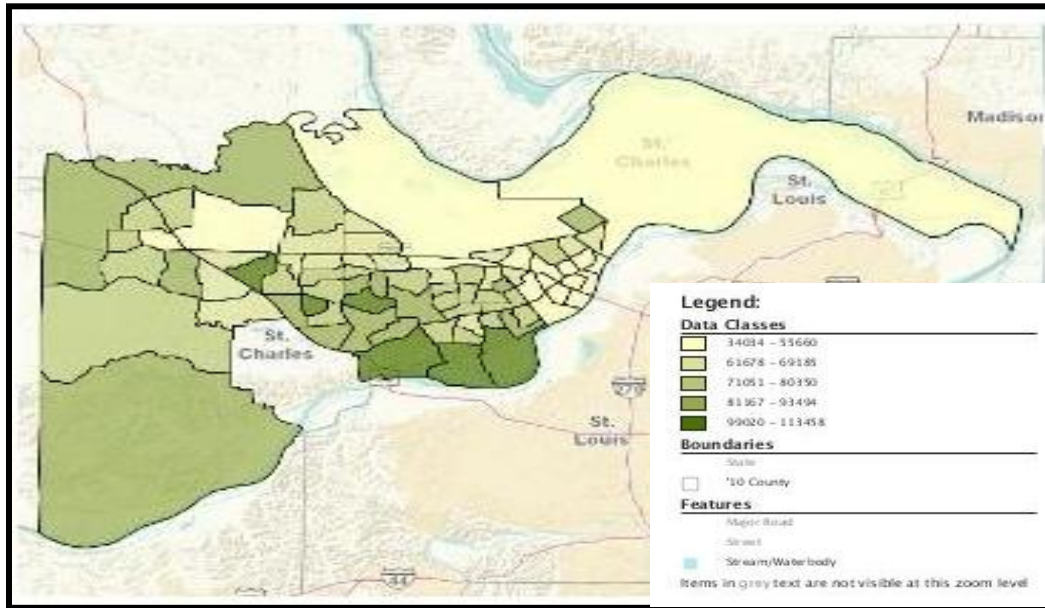
The County has the highest median household income and the second highest mean household income in the St. Louis SMA. The table below displays median and mean household and family data and per capita income.

**Table 2: St. Charles County Median Household Income**

Median household income (dollars)	64,608
Mean household income (dollars)	77,710
Median family income (dollars)	78,696
Mean family income (dollars)	89,625
Per capita income (dollars)	29,170

The following figure shows the distribution of income by census tracts.

**Figure 4: Income in Past 12 months by Census Tracts in 2010 Inflation Adjusted Dollars**



Source: 2006-2010 ACS 5-Year Estimates

The table below provides household income for the county as a whole along with data for each of the participating jurisdictions in the urban county.

**Table 3: Household Income by County**

Household Income	St. Charles County, Estimate	Cottleville Estimate	Dardenne Estimate	Lake St. Estimate	St. Paul Estimate	St. Peters Estimate	Weldon Estimate	Wentzville Estimate	Urban Co Estimate
Total:	130,973	939	3,553	5,639	683	20,756	2,164	8,596	76955
Less than \$10,000	3,750	37	99	89	3	433	116	235	1868
\$10,000 to \$14,999	3,569	3	72	209	6	516	30	150	1759
\$15,000 to \$19,999	4,239	12	122	74	12	587	40	250	2091
\$20,000 to \$24,999	4,515	10	22	174	5	760	144	259	2375
\$25,000 to \$29,999	5,049	20	68	163	7	667	71	276	2636
\$30,000 to \$34,999	4,827	15	53	144	18	1,007	97	291	2837
\$35,000 to \$39,999	5,788	15	132	165	11	1,116	33	389	3516
\$40,000 to \$44,999	6,125	23	56	366	17	976	14	330	3427
\$45,000 to \$49,999	5,394	17	79	162	25	735	67	291	2899
\$50,000 to \$59,999	11,688	68	199	585	38	1,991	161	895	7065
\$60,000 to \$74,999	15,197	121	298	560	68	2,585	49	1,140	8875
\$75,000 to \$99,999	22,653	141	670	729	167	3,845	333	1,680	13567
\$100,000 to \$124,999	16,062	108	567	898	76	2,651	200	1,214	10142
\$125,000 to \$149,999	9,585	144	416	542	87	1,429	219	567	5916
\$150,000 to \$199,999	8,240	95	449	368	83	1,059	337	439	5207
\$200,000 or more	4,292	110	251	411	60	399	253	190	2775

Source: 2006-2010 ACS 5-Year Estimates

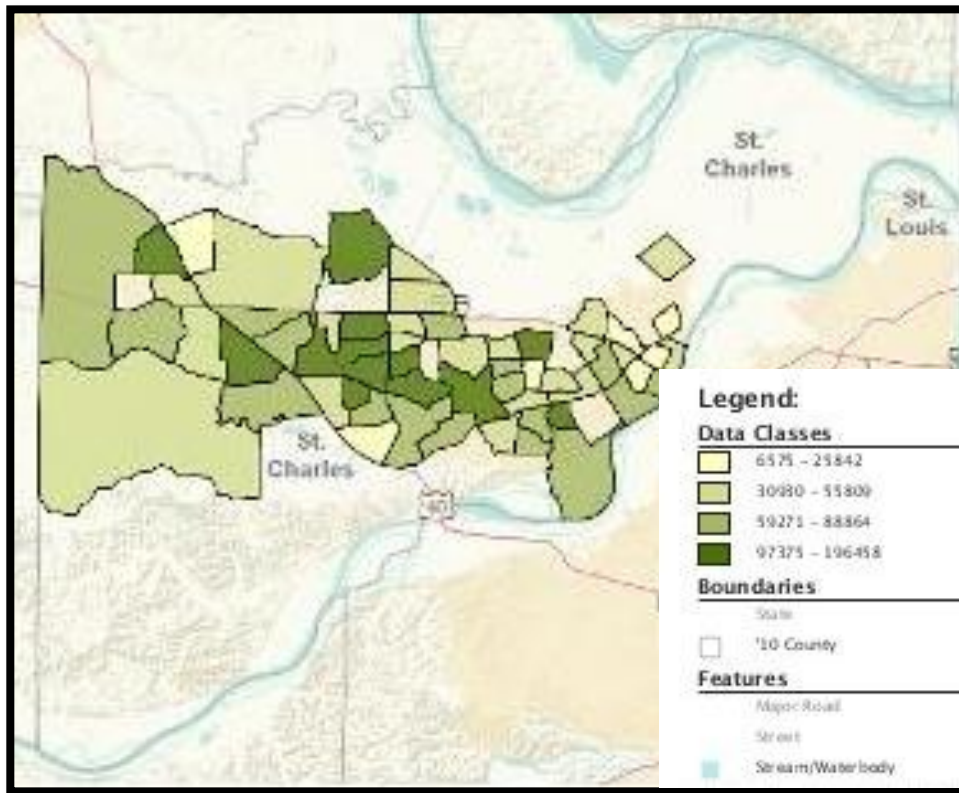
The table below shows the comparison between household income in the county as a whole and the urban county. Only small changes occur between the two areas.



**Table 4: Household Income Comparisons between St. Charles County and the Urban County**

Household Income	St. Charles County,	SCCounty	Urban Co	Urban Co
	Estimate	%	Estimate	%
Total:	130,973	100.0%	76955	100.0%
Less than \$10,000	3,750	2.9%	1868	2.4%
\$10,000 to \$14,999	3,569	2.7%	1759	2.3%
\$15,000 to \$19,999	4,239	3.2%	2091	2.7%
\$20,000 to \$24,999	4,515	3.4%	2375	3.1%
\$25,000 to \$29,999	5,049	3.9%	2636	3.4%
\$30,000 to \$34,999	4,827	3.7%	2837	3.7%
\$35,000 to \$39,999	5,788	4.4%	3516	4.6%
\$40,000 to \$44,999	6,125	4.7%	3427	4.5%
\$45,000 to \$49,999	5,394	4.1%	2899	3.8%
\$50,000 to \$59,999	11,688	8.9%	7065	9.2%
\$60,000 to \$74,999	15,197	11.6%	8875	11.5%
\$75,000 to \$99,999	22,653	17.3%	13567	17.6%
\$100,000 to \$124,999	16,062	12.3%	10142	13.2%
\$125,000 to \$149,999	9,585	7.3%	5916	7.7%
\$150,000 to \$199,999	8,240	6.3%	5207	6.8%
\$200,000 or more	4,292	3.3%	2775	3.6%

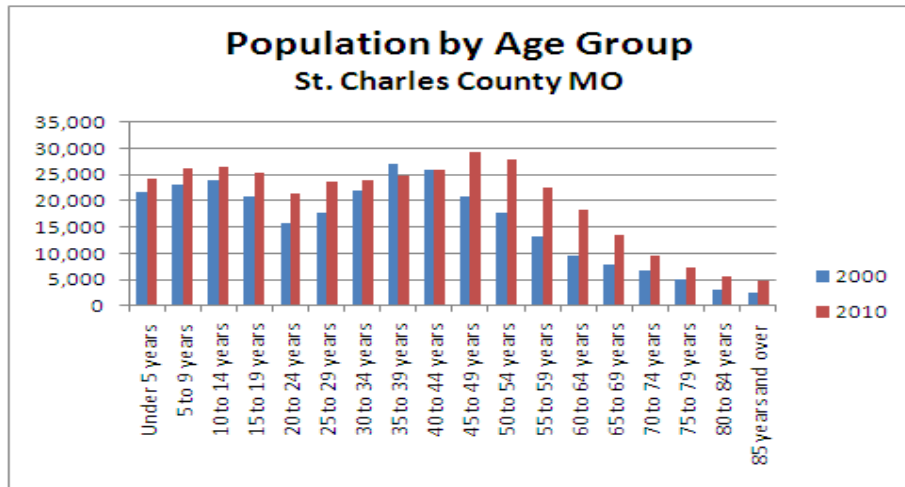
**Figure 5: Median Household Income, Black or African American by Census Tract**



Source: 2006-2010 American Community Survey

One of the more significant demographic changes in St. Charles County is the growth in population falling into the 45-69 age group, which is easily discerned by examining the chart below. Growth in this age group has resulted in the addition of 42,500 new residents representing 55% of the county's increase in population between 2000 and 2010.

**Figure 6: Population by Age Group**



Source: 2000 and 2010 Census

Age groups 50 to 64, show substantial population increases from a decade ago. These increases (28,403 residents accounting for 8% of the County’s 2010 population and 37% of the change in population between 2000 and 2010) are attributed to in-migration of 40-54 year old age groups during the past decade. Only the 35-39 year age group showed a decrease in population (-2,163); the 30-34 age group posted a small 2,014 increase and the 40-44 age group posted a minimal change of 63.

While the age groups 30-44 had an overall loss of population (-86), they still accounted for 21% (74,549) of the County’s 2010 population of 360,495. The 2010 median age in St. Charles County rose to 36.9 from 35.4 in 2000. Utilizing the data from the 2006-2010 ACS 5-year estimates, a more detailed picture of the age groupings is presented in the table below.

**Table 5: St. Charles County “Urban County” Population and Age Groups**

Total population	207222
Male	101577
Female	105645
Under 5 years	13966
5 to 9 years	15249
10 to 14 years	15911
15 to 19 years	14833
20 to 24 years	11095
25 to 34 years	26558
35 to 44 years	31386
45 to 54 years	33073
55 to 59 years	12514
60 to 64 years	11611
65 to 74 years	12113
75 to 84 years	6898
85 years and over	2015

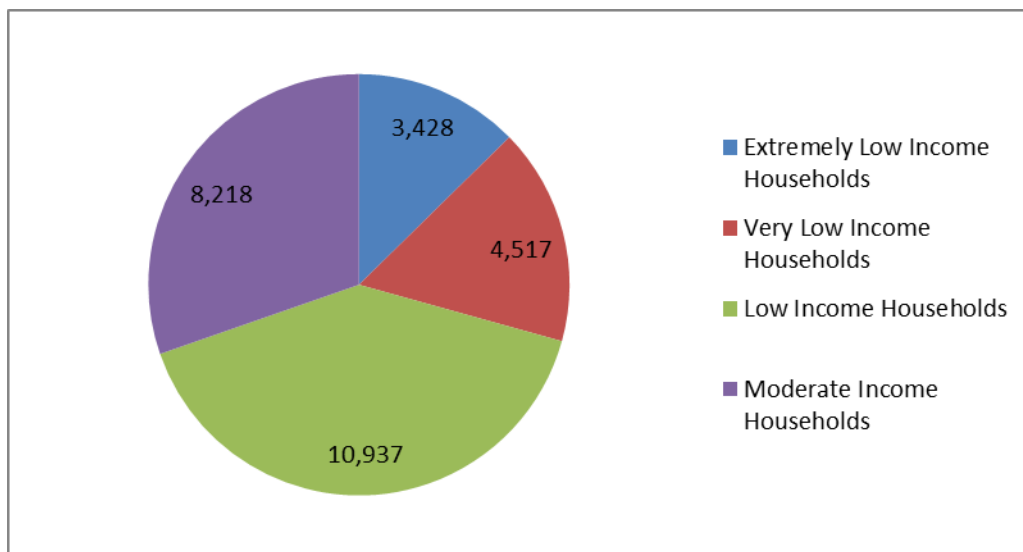
## Economic Analysis

Household income is the most important factor in determining a family's ability to balance housing costs with other basic life necessities. Household income is the means by which most individuals and families finance consumption and make provision for the future through saving and investment. As such, the level of cash income can be used as an indicator of the standard of living for most of the population. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

HUD has established the following income categories based on the Area Median Income (AMI) for St. Charles County:

- Extremely Low Income Households (Less than 30% AMI)
- Very Low Income Households (30-50% AMI)
- Low Income Households (50-80% AMI)
- Moderate Income Households (80-100% AMI)

**Figure 7: St. Charles County Income Distribution, Number of Households**



Source: HUD FFIEC Data, 2010, [www.ffiec.gov](http://www.ffiec.gov)

### ***Family and Household Income***

According to the 2010 Census, the median family income in St. Charles County was \$82,226, and the median household income was \$70,331. Males had median earnings of \$58,455 compared to \$40,192 in median earnings for females. By comparison, the median family income in 2010 was 28% higher than its level in the year 2000 at \$64,415. Also, the median household income in 2000 was \$57,258.00, showing 23% growth in 10 years.

In 2010, the per capita income for St. Charles County was \$30,664. Comparatively, the per capita income in 2000 was \$23,592. While not unaffected by the economic downturn of the last several years, the impact on the county's families and households appears, at least through Census figures, to have been minimal.

## Unemployment

As indicated in the chart below, the unemployment rate in St. Charles County more than doubled from 2007 to 2009 as job growth slowed and the economy fell into recession. At its highest point during 2009, the area's unemployment rate stood at 8.7%, lower than the national rate of 9.3%. The unemployment rate in 2007 was 4.0%.

Note: Unemployment data for 2012 is current as of September, 2012.  
 Source: St. Charles County, Missouri – PS290300  
 Bureau of Labor Statistics Local Area Unemployment Statistics –  
 LAUSMT473498

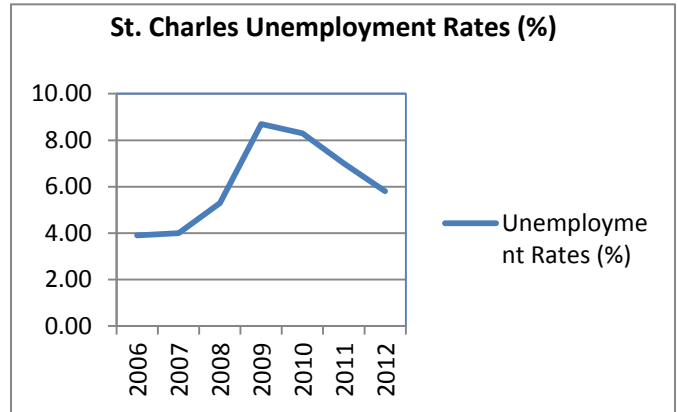


Figure 8 : St. Charles Unemployment Rates

## Poverty

According to the 2010 Census, 3.3% of families and 5.0% of all residents of St. Charles County fell below the poverty line. Both of these numbers fall below those of the State of Missouri, which saw 10.0% of all families and 14.0% of all people fall below the poverty level. Of all children under the age of 18, 3.4% lived in poverty, while 3.9 % of residents over the age of 65 lived in poverty.

Table 6: Poverty Percentage

Percentage of Families and People whose Income in the Past 12 Months is Below the Poverty Level		
	St. Charles County	State of Missouri
All families	3.3%	10.0%
With related children under 18 years	5.5%	16.2%
With related children under 5 years only	6.4%	19.8%
Married couple families	1.4%	4.5%
With related children under 18 years	2.0%	6.4%
With related children under 5 years only	2.2%	6.6%
Families with female householder, no husband present	15.6%	30.8%
With related children under 18 years	21.8%	39.4%
With related children under 5 years only	29.5%	50.8%
All people	5.0%	14.0%
Under 18 years	6.4%	19.3%
Related children under 18 years	6.1%	18.9%
Related children under 5 years only	6.4%	23.7%
Related children 5-17 years	6.0%	17.1%
18 years and over	4.5%	12.3%
18 to 64 years	4.6%	12.9%
65 years and over	3.9%	9.3%
People in families	3.6%	11.1%
Unrelated individuals 15 years and over	14.2%	26.2%

Source: 2006-2010 American Community Survey 5-Year Estimates, U.S. Census Bureau, [www.census.gov](http://www.census.gov)

## Workforce and Industry

As depicted in the following chart, St. Charles County's workforce is comprised of 87.1% private wage and salary workers, 8.8% government workers, 3.9% self-employed business owners, and 0.2% unpaid family workers. The largest sector of the workforce in St. Charles County is educational services, health care and social assistance, making up 19.2% of the total workforce. The second largest percentage of the workforce is manufacturing at 12.9%, followed closely by retail trade at 12.4%. The fourth largest percentage of the workforce is professional, scientific, management, administrative and waste management services at 10.6%. A detailed account of the workforce is included below:

**Table 7: St. Charles County Industry Sector Percentages**

<b>Industry</b>	<b>Labor Force</b>	<b>Percent</b>
<b>Class of Worker</b>		
Private Wage and Salary Workers	161,039	87.1%
Government Workers	16,178	8.8%
Self-employed in own not incorporated business workers	7,290	3.9%
Unpaid Family Workers	383	0.2%
<b>Total Private Industry</b>		
Civilian employed population 16 years and over	184,890	--
Agriculture, forestry, fishing and hunting, and mining	839	0.5%
Construction	13,010	7.0%
Manufacturing	23,812	12.9%
Wholesale trade	7,326	4.0%
Retail trade	22,922	12.4%
Transportation and warehousing, and utilities	9,240	5.0%
Information	4,971	2.7%
Finance and insurance, and real estate and rental and leasing	18,222	9.9%
Professional, scientific, management, and administrative and waste management services	19,558	10.6%
Educational services, and health care and social assistance	35,517	19.2%
Arts, entertainment, and recreation, and accommodation, and food services	15,491	8.4%
Other services, except public administration	8,667	4.7%
Public Administration	5,315	2.9%

Source: 2010 American Community Survey 5-Year Estimates, U.S. Census Bureau, [www.census.gov](http://www.census.gov)

**Table 8: Largest Employers in St. Charles County, 2011**

Company	Location	Industry	Total Employees
Citi	O'Fallon	Finance	4,100
Mastercard Worldwide	O'Fallon	Finance	1,953
True Manufacturing	O'Fallon	Manufacturing	Withheld
Verizon	Weldon Spring	Wholesale/Manufacturing	1,400
General Motors	Wentzville	Manufacturing	1,321
MEMC Electrical Materials	O'Fallon	Manufacturing	1,000
The Boeing Company	St. Charles	Wholesale / Manufacturing	1,000
Ameristar Casino	St. Charles	Accommodation	973
Client Services	St. Charles	Service	838
Enterprise Holdings	Weldon Spring	Finance	722
AT&T Missouri	St. Charles	Wholesale/Manufacturing	600

Source: St. Charles County Economic Development Center  
[http://edcsc.com/dbh\\_major-employers.htm](http://edcsc.com/dbh_major-employers.htm)

**Table 9: St. Charles County, Labor Market Statistics, 2011**

Industry Sector	Establishments	Employees
Total, across all industries	10,585	132,882
Services	4,441	50,542
Retail Trade	2,277	35,978
Manufacturing	319	11,403
Finance, Insurance & Real Estate	1,096	9,199
Construction	957	6,325
Transportation and Communications	350	5,690
Public Administration	201	5,431
Wholesale Trade	421	3,841
Unclassified	235	2,629

Source: Summary Area Profile for St. Charles County  
[http://edcsc.com/pubs/Business\\_Summary\\_SCC\\_Feb2012.pdf](http://edcsc.com/pubs/Business_Summary_SCC_Feb2012.pdf)

## Public Schools

The public school system within St. Charles County consists of five separate districts: Francis Howell, Ft. Zumwalt, Orchard Farm, St. Charles City, and Wentzville. For the purposes of impediment analysis, each of these will be reviewed with the exception of St. Charles City as the city is excluded by HUD from the urban county engaged in this study. Each of the four referenced school districts within St. Charles County has its own elected Board of Education that administers educational goals and objectives within its jurisdiction.

**Table 10: St. Charles County School District Student Populations, 2011-2012**

School District	Student Population	State Enrollment Rank
Francis Howell	17,191	9
Ft. Zumwalt	18,719	4
Orchard Farm	1,512	126
Wentzville	12,603	14
Total Student Population (all districts)	50,025	--

Source: Missouri Comprehensive Data System, <http://mcds.dese.mo.gov/guidedinquiry/>

For the 2011-2012 school year, 50,025 students (ages 3-12<sup>th</sup> grade) attended public schools within St. Charles County. Three of the four school districts within St. Charles County are ranked in the top 15 school districts statewide in terms of enrollment. The Francis Howell District is composed of 21 schools; 13 elementary schools, 5 middle schools, and 3 high schools. The Ft. Zumwalt District is composed of 24 schools; 15 elementary schools, 4 middle schools, and 5 high schools. Orchard Farm District is composed of 4 schools; 2 elementary schools, 1 middle school, and 1 high school. The Wentzville District is composed of 16 schools; 11 elementary schools, 3 middle schools, and 2 high schools.

**Table 11: St. Charles County Schools by Type, 2011-2012**

School District	Elementary	Middle	High	Total
Francis Howell	13	5	3	21
Ft. Zumwalt	15	4	5	24
Orchard Farm	2	1	1	4
Wentzville	11	3	2	16
Total Number by School Type	41	13	11	65

Source: Missouri Comprehensive Data System, <http://mcds.dese.mo.gov/guidedinquiry/>

The Missouri AYP Summary 2011<sup>15</sup> reported there is currently a total of 12 schools; 2 within the Francis Howell District, 6 within the Ft. Zumwalt District, 3 within the Wentzville District, and 1 within the Orchard Farm District, that are considered Title 1 schools. A Title 1 school is defined as a school that meets the criteria to receive federal funds due to having a high percentage of low-income students who are at risk of not meeting their state's academic standards. When a Title 1 school fails to meet AYP goals after five consecutive years, a plan must be prepared to restructure the school. The plan must include one of the following: reopen the school as a public charter school; replace all or most of the school staff; enter into a contract for a private company to operate the school or arrange for the state to take over operation of the school.<sup>16</sup>

Within the County, as displayed in the table below, the largest percentage of the student population across all school districts for the 2011 school year is White at an average of 86.6%, followed by African American

<sup>15</sup> "Missouri AYP Summary 2011," Missouri Department of Elementary and Secondary Education. <http://mcds.dese.mo.gov>

<sup>16</sup> *No Child Left Behind: A Parent's Guide*. US Department of Education, June 2003: 8-9. Web. 18, September 2012.

at an average of 6.5%. The Hispanic student population comprises an average of 3.0% across the school districts within the County. There are a significant number of economically disadvantaged students at a rate ranging from 17.2% of students within the Francis Howell District to 32.9% of students within the Orchard Farm District. This range is below the average for the State of Missouri, which is 47.8% of students who are classified as economically disadvantaged. An economically disadvantaged student is defined as a student who is a member of a household that meets income eligibility guidelines for free or reduced-priced meals (less than or equal to 185% of Federal Poverty Guidelines) under the National School Lunch Program.

**Table 12: St. Charles County Schools Student Demographics, 2011-2012**

2011-2012 Student Demographics							
	White	African American	Asian/Pacific Islander	Hispanic	Graduation Rate	Cohort Dropout Rate	Economically Disadvantaged
Francis Howell	87.3%	6.8%	3.1%	2.3%	94.3%	0.9%	17.2%
Ft. Zumwalt	85.3%	5.6%	2.7%	3.3%	90.2%	2.2%	19.1%
Orchard Farm	87.2%	5.4%	1.0%	3.8%	93.6%	3.8%	32.9%
Wentzville	86.6%	8.0%	2.0%	2.7%	90.2%	2.0%	22.3%
Missouri State Average	74.8%	17.1%	1.8%	4.5%	87.0%	3.4%	47.8%

Source: Missouri Comprehensive Data System, <http://mcds.dese.mo.gov/guidedinquiry/>

According to the Missouri Board of Education, in 2011, the graduation rate was above the state average rate for each district. The Missouri state average for 2011 is 87.0%. The Cohort Dropout ranged from less than 1% to 3.8% across all the analyzed school districts within the County. The state average is 3.4% for 2011, which was only exceeded by the Orchard Farm district at 3.8%. The Cohort Dropout rate is defined by the U.S. Department of Education as the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class.<sup>17</sup> The 2011 average ACT score for each district in St. Charles County was 22.6 for Francis Howell, 21.8 for Ft. Zumwalt and Orchard Farm, and 22.4 for the Wentzville District. The ACT average for Missouri was comparable, though lower than any of the above districts, at 21.6.

## Protected Class Analysis

### *Race*

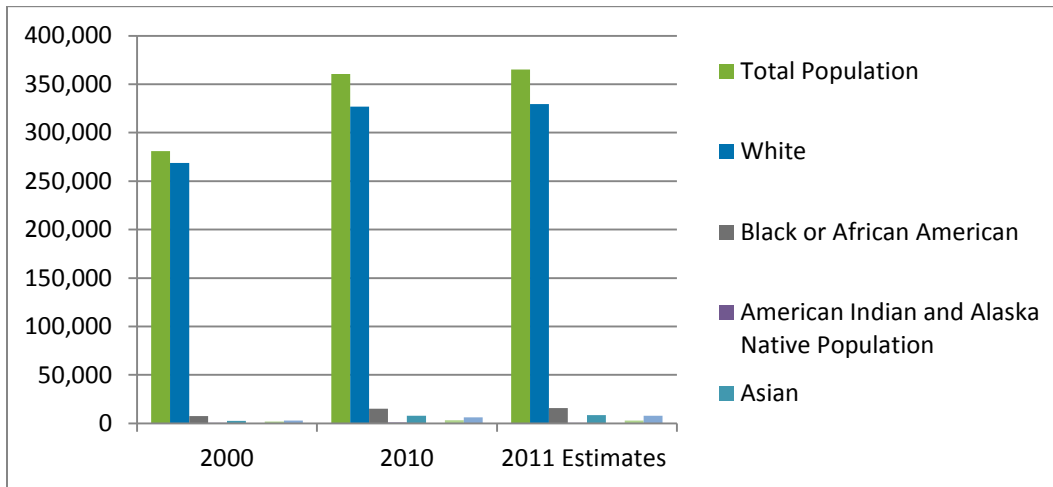
Historically, the non-Hispanic White Population has been the majority in St. Charles County. Over the past decade, the percentage of non-Hispanic White Population has decreased minimally by about 3%. The Black/African American population has grown along with the total population of St. Charles County, but the percentage of the population has remained consistent. The largest growth in St. Charles County over the past decade has been in the Black/African American population. Although this population has increased steadily since 2000, it still only makes up 4.3% of the total population according to the 2011 ACS Estimates

<sup>17</sup> High School Graduation Rate. US Department of Education, Dec. 2008: 2. Web. September 2012. <http://www2.ed.gov/policy/elsec/guid/hsgguidance.pdf>



compared to only 2.7% in 2000. The reader should be aware that the definitions and classifications used from one decennial census to the next are subject to change. The sharp increase in population falling into the “Other Population/Two or More Races” category is indicative of such a change in the Census itself and should not be interpreted strictly as a surge in this population group.

**Figure 9: St. Charles County Historical Demographic Trends**

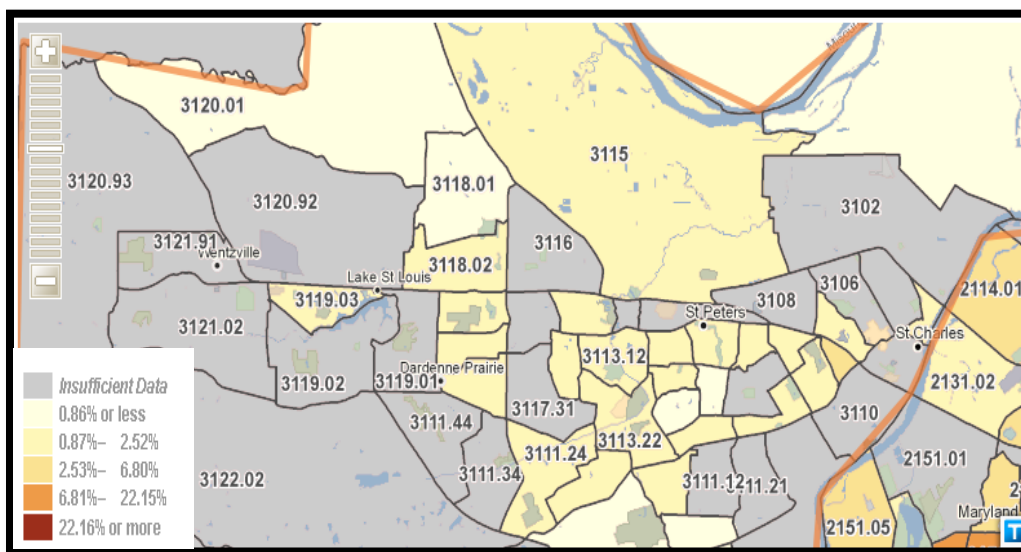


**St. Charles County Demographic Highlights**

Source: Census 2000 Summary Tape File 1, Census 2010 Summary File 1, and 2011 American Community Survey 1-year estimates

The map below shows the percentage of non-white persons living throughout St. Charles County. Minorities make up approximately 9.7% of the population in the County. The Census tracts with the largest percentages of minorities are tracts 3110.03 (21.9%), 3105.01 (19.4%), and 3110.04 (19.1%). These Census tracts are all entirely or partially within the City of St. Charles, which is not part of the urban county.

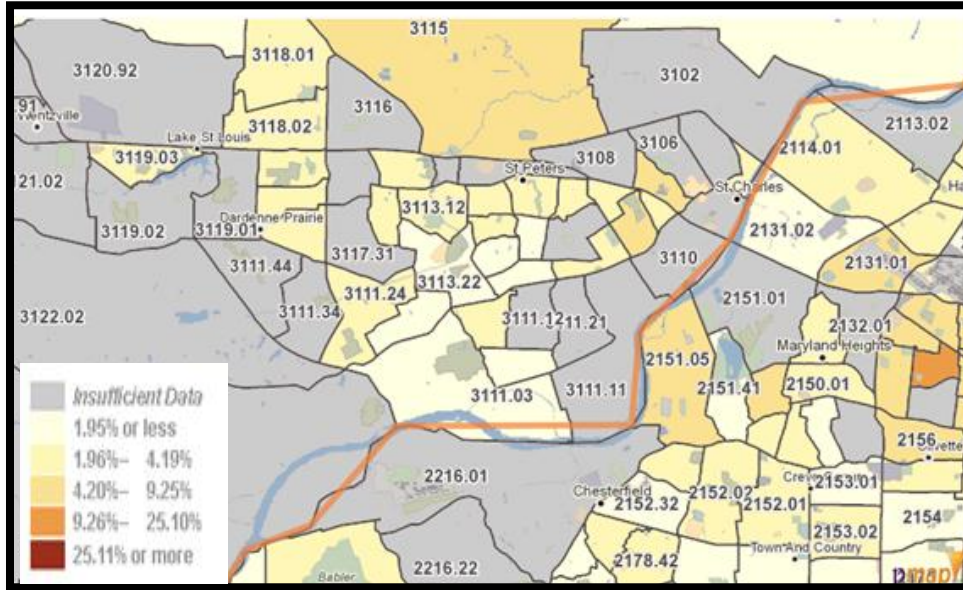
**Figure 10: St. Charles County Historical Demographic Trends – Minority Concentrations**



Source: Census 2000 Summary Tape File 1, Census 2010 Summary File 1, and 2011 American Community Survey 1-year estimates

The map below shows that the tract with the largest Hispanic/Latino population is Census tract 3115, in the Dardenne Lake area. The Hispanic/Latino population has not shown a significant increase over the past decade and only makes up 2.9% of the total population in St. Charles County.

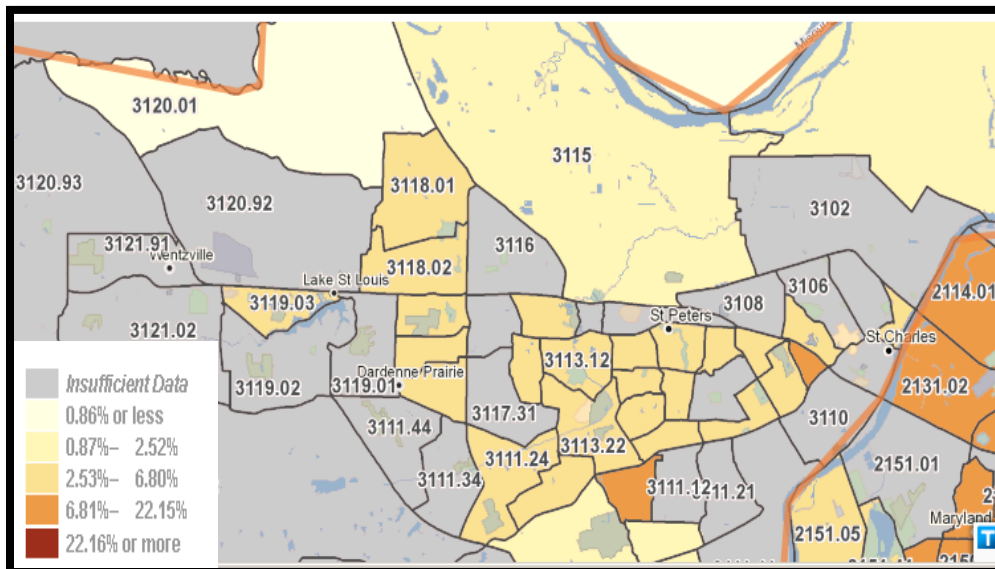
**Figure 11: Hispanic Population in St. Charles County**



Source: Policy Map: <http://www.policymap.com>

The map below shows the percentage of African-Americans residing in each Census Tract. In 2010, African-Americans made up 4.3% of the total population, with tracts 3110.3 (13.6%) in the City of St. Charles and 3120.94 (11.5%) in Wentzville having the largest percentages of this population.

**Figure 12: Black or African American Population in St. Charles County**



Source: Policy Map: <http://www.policymap.com>

## Gender

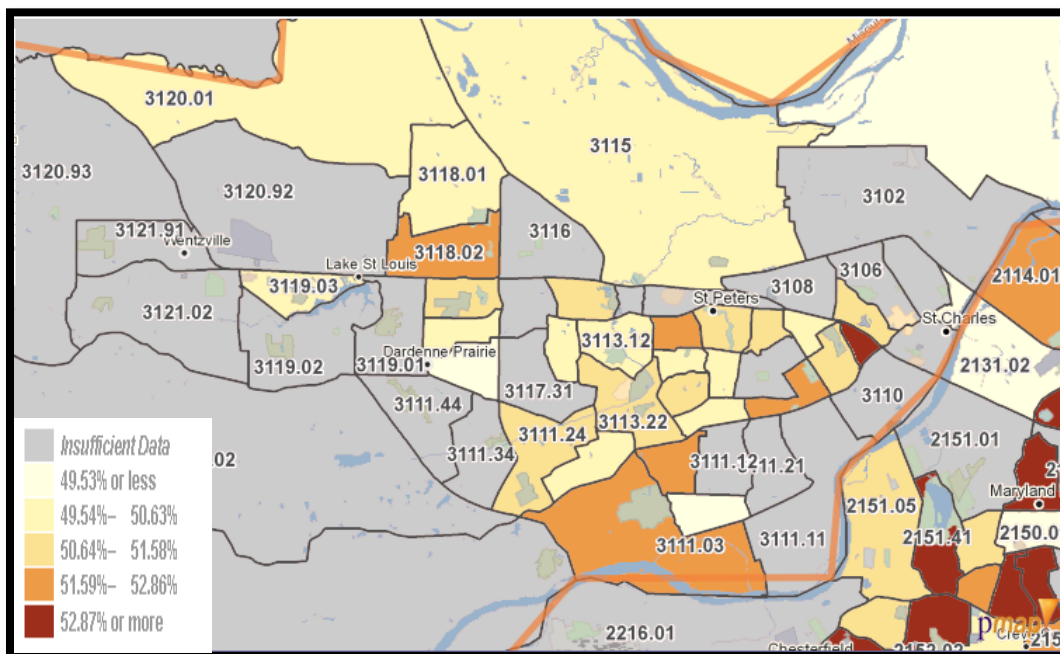
The proportion of males versus females in St. Charles County has remained largely the same since 2000. The following table shows in 2011, the average concentration of males in the County is 49.1%, and the average concentration of females in the County is 50.9%. Because women have a longer life expectancy than men, areas within the County that have high concentrations of females could be “naturally-occurring retirement communities” or communities with large nursing homes located in them. On the other hand, single-parent, female-headed households will naturally tend to have higher proportions of females to males and so areas of high female concentrations could also occur where this family type is prevalent. This being more phenomena of age or familial status than gender, an attempt is made to control for these additional variables. In order to isolate the gender variable from its linkage with age and familial status, the following analysis considers gender only among the population aged 16 to 64.

**Table 13: St. Charles County Historic Gender Composition**

St. Charles County Historic Gender Composition					
	Total Population	Male		Female	
2000	283,883	139,872	49.3%	144,011	50.7%
2010	360,485	176,922	49.1%	183,563	50.9%
2011 Estimates	365,151	179,327	49.1%	185,824	50.9%

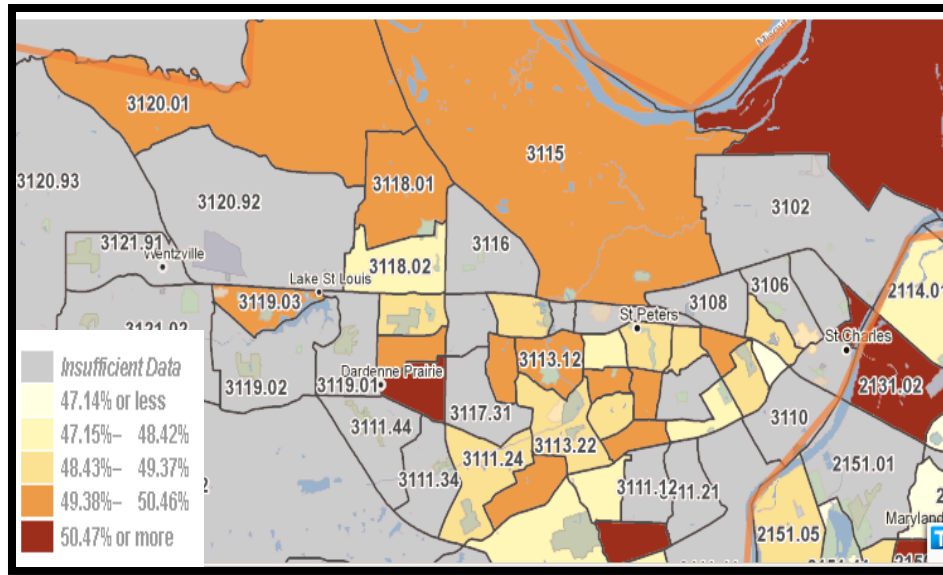
Source: Census 2000 Summary Tape File 1, Census 2010 Summary File 1, and 2011 American Community Survey 1-year estimates

**Figure 13: Female Concentrations in St. Charles County**



Source: Policy Map: <http://www.policymap.com>

**Figure 14: Male Concentrations in St. Charles County**



Source: Policy Map: <http://www.policymap.com>

**Familial Status**

The census data between 2000 and 2010 shows small fluctuations in the makeup of families throughout St. Charles County. The percentage of families with children have fallen approximately 6% while there have been increases in the number of non-family households and those living alone.

**Table 14: Familial Status in St. Charles County**

Familial Status in St. Charles County				
Household Type	2000		2010	
Total Households	101,663	100%	134,274	100
Families	77,104	75.8%	97,621	72.7%
Families w/Children	41,179	40.5%	46,371	34.5%
Married Couple Families	64,244	63.2%	78,804	58.7%
Married Couple Families w/Children	33,035	32.5%	35,782	26.6%
Male HH, no Wife	-	-	5,639	4.2%
Male HH, no Wife, with Children	-	-	3,069	2.3%
Female HH, no Husband	9,388	9.2%	13,178	9.8%
Female HH, no Husband, with Children	6,088	6%	7,520	5.6%
Non-Family Household	24,559	24.2%	36,653	27.3%
HH Living Alone	19,737	19.4%	29,568	22%
HH Living Alone [over 65 years]	5,976	5.9%	28,470	7.4%

Familial Status in St. Charles County  
Sources: Census 2000 Summary File 1 and Census 2010 Summary Tape File 1

**National Origin**

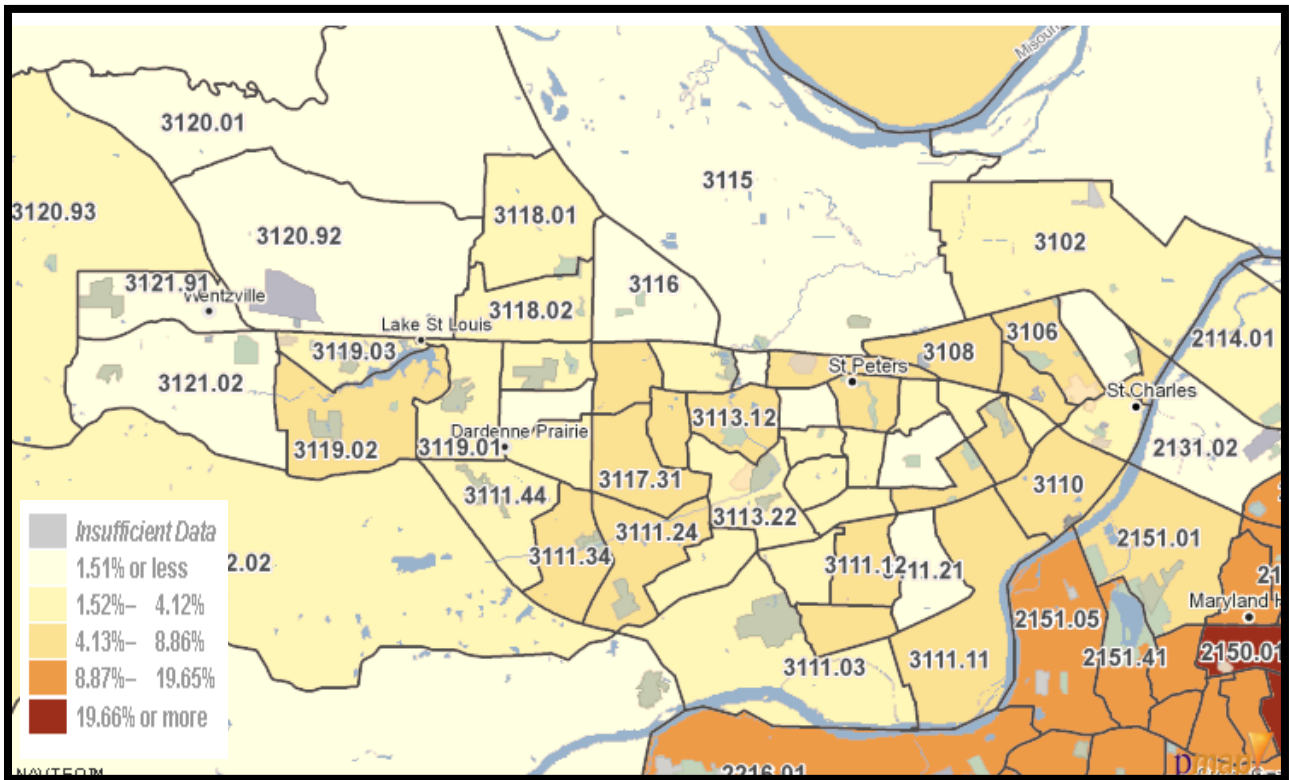
According to the 2009 ACS 3-Year Estimates for St. Charles County, 3.4% of the population was born in foreign countries. The majority of the foreign born population is from Asia as this population makes up 43.6% of the foreign born population while Latin Americans make up 22.3% of the foreign born population.

**Table 15: National Origin of Residents in St. Charles County**

Selected Social Characteristics in the United States 2009-2011 American Community Survey 3-Year Estimates		
Foreign-born population, excluding population born at sea	13,168	13,168
Asia	5,743	43.60%
Africa	676	5.10%
Oceania	162	1.20%
Latin America	2,937	22.30%
Northern America	495	3.80%

Sources: Census 2000 Summary File 1, and 2009 American Community Survey 1-year estimates

**Figure 15: Foreign Born Population Map**



Source: Policy Map: <http://www.policymap.com>

**Disability**

The U.S. Census Bureau has frequently varied its definition and methodology for calculating the number of persons with disabilities, making it difficult to compare data over multiple years. The 1990 Census did not include an indicator of disability status and the 2000 Census uses a methodology inconsistent with that used in later American Community Survey instruments.<sup>18</sup> Furthermore, from 2006 forward, the sample definition for “civilian non-institutionalized population” included non-institutionalized group quarters populations that were previously excluded. The Census Bureau cautions that this change may “have a noticeable impact on the disability distribution.”<sup>19</sup> For this analysis, the 2009-2011 three-year ACS estimates are used without any comparison with data from other years; the reader will note that this is inconsistent with the prior Protected Class analyses.

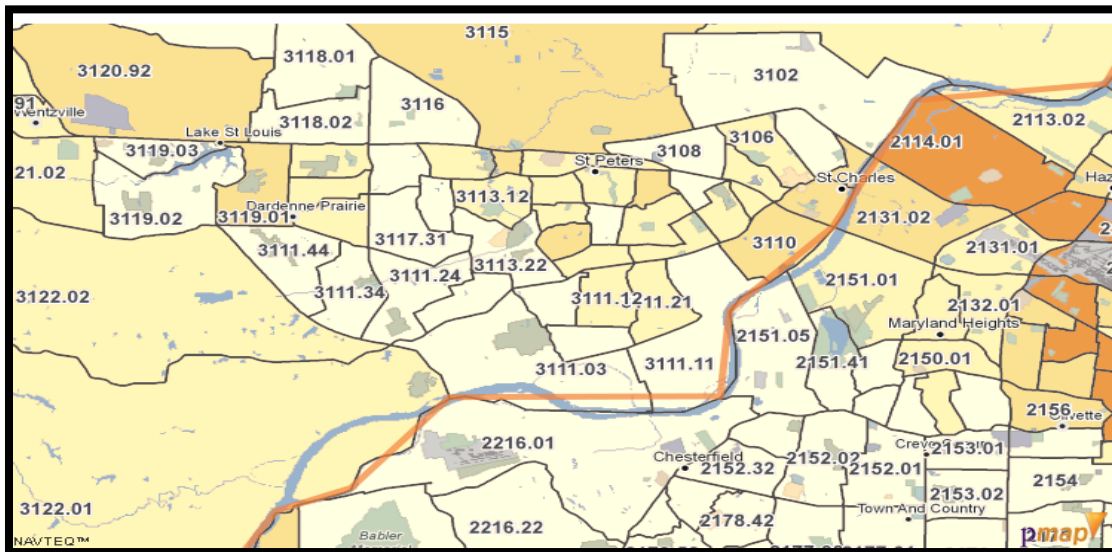
**Table 16: Disability Status in St. Charles County**

The 2009-2011 ACS estimates show that approximately 10% of the County’s civilian, non-institutionalized population aged 5 to 65 was disabled. Because the ACS does not provide disability data at the census tract level, individual tracts can only be compared to one another using 2000 Census data. The map below shows the concentration of disabled persons in St. Charles County using 2000 Census data as this is the most current data for disabled persons between the ages of 16 and 64.

Selected Social Characteristics in the US 2009-2011 ACS 3-Year Estimates		
Total Civilian Non-institutionalized Population	359,094	359,094
With a disability	35,969	10.00%
Under 18 years	92,437	92,437
With a disability	3,933	4.30%
18 to 64 years	226,497	226,497
With a disability	18,075	8.00%
65 years and over	40,160	40,160
With a disability	13,961	34.80%

Source: 2009 ACS 2009-2011 3 year estimates

**Figure 16: Disabled Persons Age 16-64 Population Map**



Source: Policy Map: <http://www.policymap.com>

<sup>18</sup> “Technical Documentation.” 2000 Census of Population and Housing, Summary File 3. <http://www.census.gov/prod/cen2000/doc/sf3.pdf>

<sup>19</sup> “2007 Subject Definitions.” American Community Survey. [http://www.census.gov/acs/www/Downloads/2007/usedata/2007\\_ACS\\_Subject\\_Definitions.pdf](http://www.census.gov/acs/www/Downloads/2007/usedata/2007_ACS_Subject_Definitions.pdf)

## Fair Housing Education

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Fair housing education is a critical aspect in reducing fair housing violations and provides citizens knowledge of their rights and of their options when they feel their rights have been violated. A logical assumption can be made that the more complaints that are filed, the more likely people are aware of their rights and what is covered in the Fair Housing Act. The baseline measurement regarding public awareness of fair housing issues comes from a national survey conducted in 2000 by the HUD. The survey revealed that “majorities of the adult public were knowledgeable about and approved of most aspects of the law<sup>20</sup>. However, only a small percentage of survey respondents who asserted their fair housing rights had been violated took action. In 2005, a follow up survey was conducted by HUD to measure the increase of national public awareness of fair housing rights and the survey revealed very little change in public awareness overall, however public support for fair housing had dramatically increased.

Public awareness of fair housing issues and laws ensures that citizens know their rights and what to do if their rights have been violated. In general, fair housing services can typically include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Services can also include providing landlord/tenant counseling that educates landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation as well as mediating disputes between tenants and landlords. While St. Charles County itself does not have any organizations dedicated to providing fair housing education to the general public, there are organizations that receive complaints if a citizen feels they have been discriminated against. St. Charles County and US Department of HUD Region VII Office of Fair Housing and Equal Opportunity (FHEO) receive complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Iowa, Kansas, Missouri, and Nebraska. The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) is a nonprofit fair housing advocacy and enforcement organization that provides fair housing education and outreach services and investigates housing discrimination in the Greater St. Louis area.

The Diversity Awareness Committee of the St. Charles County Association of Realtors meets monthly and promotes diversity within the real estate profession, advocates for fair and equal access to residential and commercial real estate, and informs and educates about the value of diversity. The Equal Opportunity/Cultural Diversity Committee of the St. Louis Association of Realtors promotes equal housing opportunity diversity within the real estate industry. The committee meets regularly to discuss fair housing and cultural diversity, identify diversity and fair housing education needs and goals, and promote changes in real estate business practices to reflect the growing cultural diversity within the St. Louis region. Based on the responses derived from the Fair Housing Survey conducted in conjunction with this Analysis, many residents in the County expressed a need for improvement on fair housing education efforts directly to the housing industry and to the general public. A brief summary of the survey responses are as follows:

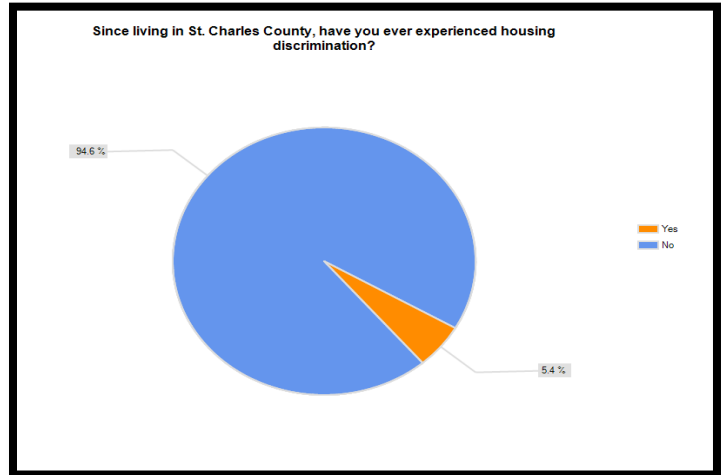
When asked if any of the survey respondents had ever experienced housing discrimination, 105 out of 111 [94.6%] respondents stated they had never experienced housing discrimination. While only 6 [5.4%] of

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<sup>20</sup> Martin D. Abravanel and Mary K. Cunningham, Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law, U.S. Department of Housing and Urban Development, February 2006. Source: <http://www.fhco.org/pdfs/DoWeKnowMoreNowSurvey2006.pdf>

respondents reported that they had experienced housing discrimination. The chart below shows the percentage of residents who reported experiencing discrimination in St. Charles County.

**Figure 17: Residents who have Experienced Discrimination in the St. Charles County**

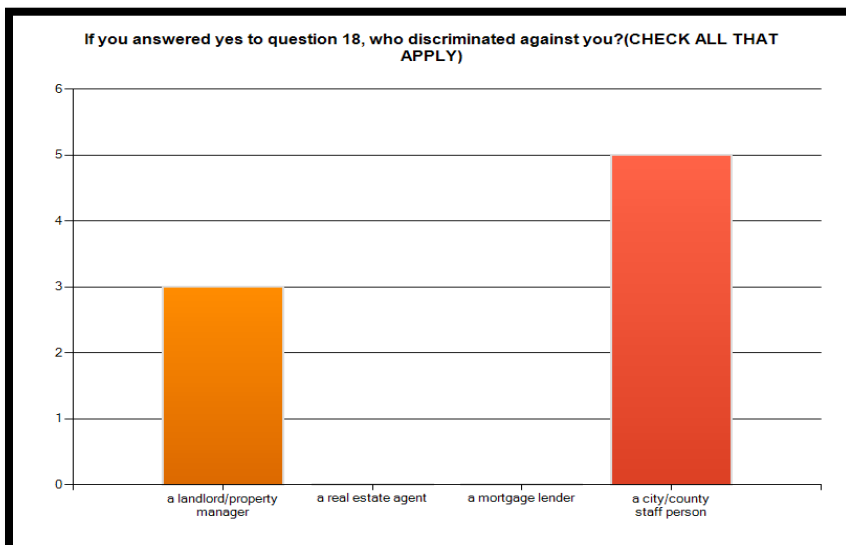


Source: St. Charles County Fair Housing Survey  
[http://www.surveymonkey.com/MySurvey\\_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfo3FoNsbA77w%3d](http://www.surveymonkey.com/MySurvey_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfo3FoNsbA77w%3d)

The respondents that had experienced discrimination were asked a follow-up question to ascertain the source of discrimination. Of the 6 survey respondents who reported that they had been discriminated against, 3 of the respondents stated that a landlord or property manager had discriminated against them and 3 reported that a City staff person discriminated against them, and 1 person indicated that a neighbor discriminated against them.

Additionally, out of the 6 survey respondents who had experienced discrimination 2 [33%] actually filed a fair housing complaint.

**Figure 18: Residents who filed a Fair Housing Complaint**

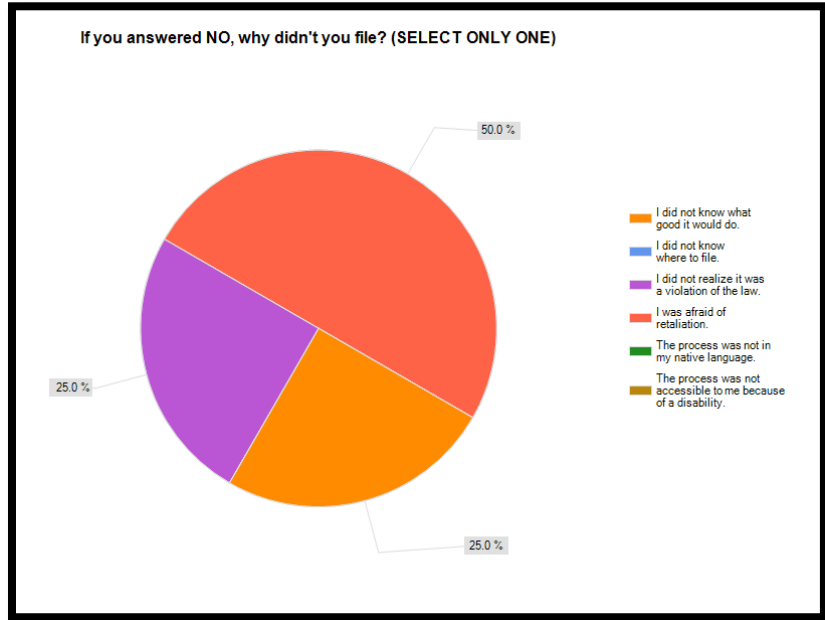


Source: St. Charles County Fair Housing Survey  
[http://www.surveymonkey.com/MySurvey\\_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfo3FoNsbA77w%3d](http://www.surveymonkey.com/MySurvey_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2lDlfo3FoNsbA77w%3d)



When asked the reason respondents did not file a fair housing complaint, 2 of the 4 [50%] survey respondents stated that they were afraid of retaliation; while 1 person stated that they did not realize it was a violation of the law and 1 person stated that they did not know what good it would do.

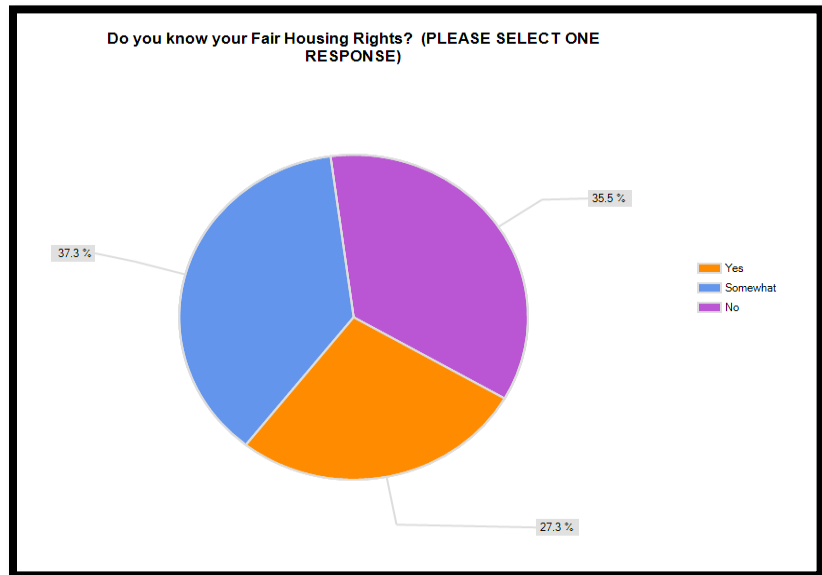
**Figure 19: Filing a Fair Housing Complaint**



Source: St. Charles County Fair Housing Survey  
[http://www.surveymonkey.com/MySurvey\\_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDIfvo3FoNsbA77w%3d](http://www.surveymonkey.com/MySurvey_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDIfvo3FoNsbA77w%3d)

When asked if survey respondents were knowledgeable about their fair housing rights, 71 out of the 110 survey respondents [64.6%] stated they were either familiar or somewhat familiar with fair housing rights. While 39 of the 110 survey respondents [35.5%] stated they did not know their fair housing rights.

**Figure 20: Knowledge of Fair Housing Rights**



Source: St. Charles County Fair Housing Survey  
[http://www.surveymonkey.com/MySurvey\\_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDIfvo3FoNsbA77w%3d](http://www.surveymonkey.com/MySurvey_Responses.aspx?sm=HSOhK1YklypH4TGnSERF05T4ZL2IDIfvo3FoNsbA77w%3d)

While HUD has not determined a national standard for the adequate level of public awareness; HUD encourages jurisdictions to make a continual effort to increase public awareness of fair housing laws. HUD's FHEO encourages jurisdictions to implement education and outreach activities in an effort to reduce potential violations of fair housing laws. Knowing about the laws and their penalties can serve as a deterrent and help protect against discrimination complaint charges being filed in St. Charles County.

## Fair Housing Complaints

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HUD's Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through their regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is conducted.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party (complainant or respondent) may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in federal court.

The study, "*How Much Do We Know*", published by HUD in 2002, reports that only half of the public could correctly identify as "unlawful" six out of eight scenarios describing illegal fair housing conduct. Nearly one-fourth of the public knew the law in two or fewer of the eight cases. In addition, 14% of the adult population claimed to have experienced some form of housing discrimination at some point. Of those who thought they had been discriminated against, 83% indicated they had done nothing about it, while 17% say they did pursue a complaint. In HUD's follow-up study *Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law* (published in 2006) "41% of the former survey respondents said it was "very likely" they would do something about future discrimination compared to only 20% in the 2002 survey."<sup>21</sup> The survey revealed that 46% of those who reported having experienced discrimination in the past and done nothing about it said they would very likely do something about future discrimination.

Individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue justice. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing impediments.

According to the National Fair Housing Alliance (NFHA), 2012 Fair Housing Trends report, more disability complaints have been filed nationwide than any other type of fair housing complaint. NFHA suggests that this may be attributed to property owners' direct refusal to make reasonable accommodations or modifications for people with disabilities. As a result, HUD has implemented the Fair Housing Accessibility FIRST program to assist in educating architects and builders regarding design and construction of accessible housing units.

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<sup>21</sup> *Do We Know More Now? Trends In Public Knowledge, Support And Use Of Fair Housing Law*. HUD Policy Development & Research. <http://www.huduser.org/Publications/pdf/FairHousingSurveyReport.pdf>

### Complaints Filed With HUD

Region VII of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Iowa, Kansas, Missouri, and Nebraska. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence. The following table identifies the number of complaints filed by the location at which the alleged discrimination occurred, the status of the complaint, and the bases for the complaint.

From January 1, 2007 to January 19, 2012 there were 64 housing complaints filed regarding housing in St. Charles County. Of these complaints, 21 were determined to have cause and 5 were settled through conciliation. A total of 11 of the “with cause” complaints were withdrawn after resolution. As of January 19, 2012, 49 of the 64 FHEO complaints had been closed. The complaints as documented by the FHEO are found in full in the Appendix.

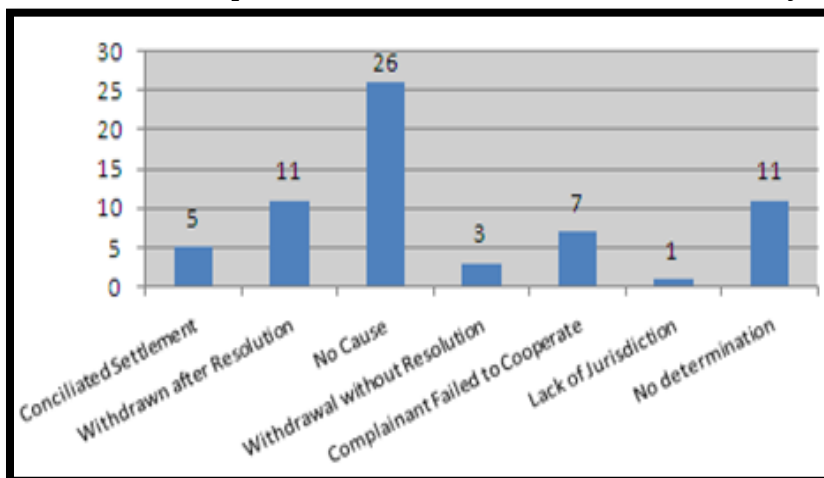
Complaints of Housing Discrimination Received in St. Charles Urban County Jurisdiction	
Violation City	St. Charles Urban County Jurisdiction
# Filed	64
# Closed	49
# Open	11
With Cause	21
Settlement	5
Disability	31
Color/ Race	33
Familial Status	7
Marital Status	0
Sex	2
National Origin	3
Age	0
Citizenship	0
Religion	0
Retaliation	4
Harassment	0
Other/ Criminal Status	0

### Complaints of Housing Discrimination Received in St. Charles County

Source: U.S. Housing & Urban Development Office of Fair Housing and Equal Opportunity

This review of complaints finds that the overwhelming majority of complaints investigated by the FHEO for St. Charles County were based on color or race and disability status, respectively at 52% and 48% of the total types of Protected Class complaint filings with familial status and retaliation as the next largest complaints at 11% and 6%. It should be noted that these complaint numbers exceed the total number of filings (and the percentages exceed 100%) due to multiple discrimination allegations within a single filed complaint.

**Figure 21: FHEO Complaint Closure Reasons - St. Charles County, MO**



***Complaints Filed With Metropolitan St. Louis Equal Housing Opportunity Council [EHOC]***

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) was established in 1992 as a private, nonprofit fair housing advocacy and enforcement organization and provides fair housing education and outreach services as well as accepts and investigates fair housing discrimination complaints for the Greater St. Louis Area.

**Table 17: EHOC Housing Discrimination Complaints in St. Charles County**

<b>EHOC Complaints of Housing Discrimination Received in St. Charles Urban County Jurisdiction</b>					
<b>Violation City</b>	<b>Lake St. Louis</b>	<b>St. Charles</b>	<b>St. Peters</b>	<b>Wentzville</b>	<b>TOTALS</b>
<b># Filed</b>	1	14	12	2	<b>29</b>
<b># Closed</b>	1	13	12	2	<b>28</b>
<b># Open</b>	0	1	0	0	<b>1</b>
<b>With Cause</b>	1	14	12	2	<b>29</b>
<b>Settlement</b>	Yes	Yes	Yes	Yes	
<b>Disability</b>	1	7	2	0	<b>10</b>
<b>Color/ Race</b>	0	1	6	1	<b>8</b>
<b>Familial Status</b>	0	2	1	0	<b>3</b>
<b>Marital Status</b>	0	0	0	0	<b>0</b>
<b>Sex</b>	0	0	0	0	<b>0</b>
<b>National Origin</b>	0	3	3	0	<b>6</b>
<b>Age</b>	0	0	0	0	<b>0</b>
<b>Citizenship</b>	0	0	0	0	<b>0</b>
<b>Religion</b>	0	0	0	0	<b>0</b>
<b>Retaliation</b>	0	0	0	0	<b>0</b>
<b>Harassment</b>	0	0	0	0	<b>0</b>
<b>Other/ Criminal Status</b>	0	1	0	0	<b>1</b>

Between January 1, 2007 and September 31, 2012, 29 complaints were filed with the EHOC. Among the complaints received by EHOC, allegations of discrimination based on disability status were the most common (10 complaints). Discrimination with regard to race and color ranked second (8 complaints), “other” complaints (such as national origin and familial status) followed at 6 and 3 complaints, respectively.

***Complaints Filed With St. Charles County***

The County’s Fair Housing Policy (Chapter 225, Ordinances of St. Charles County, Missouri) provides that housing discrimination complaints shall be referred to the Director of the Department of Community Development. This department is charged with the responsibility to investigate the complaints filed with the St. Charles County government. Additionally, the department has the authority to either dismiss a

complaint if no merit is determined or, if the finding has merit, the department has the authority to initiate settlement and conciliation of the complaint. If the department is unable to resolve the complaint, it will forward the complaint to the County Attorney's Office which has the discretion to proceed with further legal action regarding the complaint. Between January 1, 2007 and September 31, 2012, no fair housing complaints were filed with the County.

### ***Complaints Filed With the Missouri Commission on Human Rights***

The Missouri Commission on Human Rights (MCHR) also receives, investigates, and facilitates resolution of housing discrimination complaints as well as complaints of employment-related and other types of discrimination. In the course of this analysis, St. Charles County requested housing discrimination complaint data from the Missouri Commission on Human Rights on November 7, 2012. The MCHR provided data in response to the County's request on January 2, 2013, after this analysis had been completed and posted for public comment. As such, the complaint data received from MCHR has been included in the appendix, but is not discussed in detail here.

### ***Summary of Findings***

An examination of fair housing complaints for jurisdictions can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. Among the agencies accepting fair housing complaints for St. Charles County, the largest numbers of complaints filed were alleged claims of discrimination based on disability status and race/color.

A low number of complaints filed should not be indicative of a low incidence of housing discrimination in a community. Many households do not file complaints because they are not knowledgeable of the process for filing a complaint. However, there are households that are aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law. Finally, most households are more interested in achieving their first priority of finding decent affordable housing and prefer to avoid going through the process of filing a complaint and following up to ensure the case is resolved.

In conducting this fair housing complaint analysis, several data limitations should be noted:

- Because each agency's complaint process relies on people self-reporting, the data represents only complaints filed and is not inclusive of the total number of inquiries and does not represent all acts of housing discrimination, as all incidents may not be reported;
- Larger, denser areas are likelier to have a higher number of complaints due to larger populations;
- The fair housing complaint timeframe considered in the Analysis ranges due to each agency's access to archived complaint data;
- The fair housing complaints filed in St. Charles County represent the location in which the discrimination occurred and may include complaints filed by residents of other jurisdictions.

## Home Mortgage Disclosure Act (HMDA) Analysis

Homeownership rates are important to a community's financial well-being. Prospective homebuyers expect to have access to mortgage credit, and programs that offer homeownership must be available without regard to discrimination, income, or profession. To truly live up to fair housing law, all persons must have the ability to live where they want and can afford.

Access to mortgage credit enables residents to own their homes and access to home improvement loans allows them to keep older houses in good condition. Access to refinancing loans assures achievement of the dreams that all Americans have. All of these help keep neighborhoods attractive and residents vested in their communities.

Inadequate lending performance results in various long term and far ranging community problems, and of these, disinvestment is probably the most devastating. Disinvestment in St. Charles County by its lenders would reduce housing finance options for borrowers and weakens competition in the mortgage market for low- and moderate-income neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for homeownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. Financial decay in the business sector as well as in the private sector is also a result of disinvestment in the form of business relocation, closure and bankruptcy. Full service local lenders that have traditionally served residents and businesses are one of the main elements that keep neighborhoods stable.

Significant changes are occurring in the lending market not only in St. Charles County but throughout the United States. The number and type of lenders have changed over the last ten years, and it is a common occurrence to read about national lenders buying local lenders. These national lending institutions are becoming increasingly more active locally, as the market share of national corporations is growing yearly. The newest issue to emerge from the changes in the market is the substantial growth of the sub-prime market and the impact these lenders have on communities and neighborhoods. More and more we see local, commercial banks lose market share to lenders outside the city.

Table 19

DEPOSITORY INSTITUTIONS IN ST. CHARLES COUNTY	
Institution	Offices
1st Advantage Bank	1
Bank of America, National Association	8
BMO Harris Bank National Association	2
Bremen Bank and Trust Company	1
Carrollton Bank	1
CBC Bank	1
Citizens National Bank of Greater St. Louis	2
Commerce Bank	8
Eagle Bank and Trust Company of Missouri	1
Enterprise Bank and Trust	2
F&M Vank and Trust Company	1
Fifth Third Bank	5
First Bank	7
First National Bank of St. Louis	4
First State Bank of St. Charles, Missouri	5
Frontenac Bank	1
Great Southern Bank	2
Heartland Bank	1
HNB National Bank	1
Jefferson Bank and Trust Company	1
Lindell Bank & Trust Company	3
Midwest BankCentre	1
New Frontier Bank	3
Peoples Bank & Trust Co.	1
Peoples Savings Bank of Rhineland	1
PNC Bank, National Association	7
Providence Bank	3
Pulaski Bank	2
Regions Bank	8
Reliance Bank	3
St. Johns Bank and Trust Company	4
The Bank of Old Monroe	2
The Missouri Bank	2
Truman Bank	1
U.S. Bank National Association	13
UMB Bank, National Association	5
Source: FDIC, Dec. 22, 2011	

Like most suburbs of a Metropolitan Statistical Area (MSA), St. Charles County is highly influenced by lending activity throughout the area. In this context, much of the information in this section refers to the MSA as a whole.

There were 114 financial institutions with a home or branch office in St. Charles County, and whose data make up the 2011 report Offices and Branches of FDIC-Insured Banks. Home Mortgage Disclosure Act reporting methods do not allow for a distinction between those lenders that wrote business in St. Charles County from those that did not. In addition, other lending institutions that do not have a home or branch office in the MSA wrote business throughout St. Charles County. The lenders with offices and branches in the County are noted below. The physical presence of financial institutions in communities facilitates relationships with banks, and the location of these institutions is a primary concern for a community. Areas left without branches or with access to only ATM machines must find alternative sources for services (such as check cashing businesses or finance companies), which can be more expensive than traditional financial institutions or credit unions.

The Home Mortgage Disclosure Act (HMDA) was passed by Congress in 1975 and amended in 1989. This law mandates that financial institutions such as banks, savings and loan associations, mortgage companies, and credit unions, report information concerning their home lending activity. As required by the statutes and regulations, these lenders must disclose the number of loan applications by census tract, and by the income, race, and gender of the applicant and co-applicant. In fact, the HMDA and other federal non-discriminatory policies related to housing state that these financial institutions must make decisions as if they had no information about the applicant's race, regardless of whether race is a good proxy variable for risk factors that a lender cannot distinguish or observe.

Each year, lenders must report the number of loan applications approved and denied. Lenders must also indicate how many of their loan approvals were not accepted (the institution approved the loan but the applicant refused). Finally, the lenders must specify how many applications were withdrawn (the applicant withdrew his application before the bank made a credit decision), and how many applications were incomplete (the applicant did not provide all the necessary information).

“The United States has enacted a variety of laws making it illegal for lenders to discriminate against members of historically disadvantaged groups, particularly women and minorities. These laws include most notably the Fair Housing Act of 1968 and the Equal Credit Opportunity Act of 1974 (ECOA). ECOA also makes it illegal for lenders to use the racial composition of the neighborhood as a determinant of the lending decision. In addition, policy concern about the viability of urban neighborhoods has generated laws such as the Community Reinvestment Act of 1977 that impose an affirmative obligation on lenders to help meet the credit needs of their entire communities”.<sup>22</sup>

Historically, barriers to fair housing choice have included practices of the lending community that have denied mortgages to minorities at a substantially higher rate than Caucasians. While HMDA data alone cannot be used to prove discrimination by banks and other lending institutions, data can be used to determine whether discrimination may be occurring. An analysis of Home Mortgage Disclosure Act (HMDA) data from 2010 and 2011 was performed to determine whether such practices may be evident in the mortgage lending patterns in St. Charles County.

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<sup>22</sup> Ladd, Helen. 1998. Evidence on Discrimination in Mortgage Lending. *Journal of Economic Perspectives* 12:41-62.



The broadest measure of lending activity is total market activity, which covers all three categories of home loans (purchase, refinance, and home improvement). By far the most significant loan activity in the County was for the purposes of refinancing an existing loan (75.4%) followed by mortgages for home purchases (23.3%). It is not surprising that refinance loans are so significant since they are thought of as a common way for homeowners to access cash or to reduce monthly housing expenses by lowering the interest rates that have been prevalent the last several years.

Of all of the loan applications filed with the banks in St. Louis MO-IL MSA during 2010, White customers accounted for the greatest number, not surprisingly since they also account for more than 90% of the County's population. However, Black applicants were nearly 65% more likely to have their application rejected because of credit history issues. However, their rejection rates for all other reasons are comparable to if not better than that for White applicants. Applicants from other population groups which represent a small percentage of the total applications reviewed were better than Whites in some categories or comparable.

Table 20

<b>REASONS FOR DENIAL BY RACE (PERCENTAGE) St. Louis, MO-IL MSA 2010</b>										
<b>Reasons for denial of Applications by Race</b>	<b>Debt-to-income ratio</b>	<b>Employment History</b>	<b>Credit History</b>	<b>Collateral</b>	<b>Insufficient Cash</b>	<b>Unverifiable Information</b>	<b>Credit App. Incomplete</b>	<b>Mortgage Insurance Denied</b>	<b>Other</b>	<b>Applications</b>
AMERICAN INDIAN/ALASKA NATIVE	16.7	0	26.9	20.5	2.6	2.6	10.3	0	20.5	78
ASIAN	25.2	1.6	11.9	23.6	2.3	6.1	13.3	0.2	15.8	444
BLACK OR AFRICAN AMERICAN	17.1	1	35.1	20.7	3.8	3	6.1	0.4	12.8	2733
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	22	4	26	20	4	2	4	0	18	50
WHITE	19.2	1.6	21.3	26.8	3	3.5	9.1	0.7	14.8	15980

Applicants for both refinance and home improvement loans already have histories as borrowers and have equity in their homes. For these reasons, securing additional financing ought to be easier. There are, in fact, two types of home refinance loans. One involves borrowing funds in the amount of the existing mortgage at a lower interest rate so that the homeowner's monthly mortgage payment is lower. Certainly, this type of loan is favorable, since the homeowner will be better able to afford remaining in the home and will continue to support the community. The second type is one in which the homeowner extracts accumulated equity in order to afford a large-ticket expense, such as a wedding or a new vehicle, or to consolidate accumulated smaller debts. This type of refinance can be viewed less favorably, since the owner is disinvesting in the property by withdrawing his accumulated wealth. From a lender's point of view, the reduced owner's equity represents a higher risk for the lender.

Table 21

REASONS FOR DENIAL BY LOAN PURPOSE St. Louis SMA 2010									
Reasons for denial of Applications by Loan Purpose	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other
Home Mortgage	20.5%	3.1%	30.6%	17.3%	4.9%	4.5%	6.5%	1.0%	11.7%
Refinance	18.9%	1.3%	18.1%	29.0%	3.0%	3.6%	10.1%	0.6%	15.4%
Home Improvement	17.4%	0.6%	46.0%	17.8%	0.7%	0.5%	3.0%	0.1%	13.9%

Home improvement loan applications historically have the highest rate of denials, but this could be due to the fact that there is no separate category for reporting second mortgages and equity-based lines of credit, and lenders use the Home Improvement category to report this activity.

Table 22

DENIALS BY LOAN PURPOSE (St. Charles County 2010)					
LOAN PURPOSE	DENIALS	%DENIALS	TOTAL	% TOTAL	DENIALS/TOTAL
HOME MORTGAGE	433	15.1%	4139	23.3%	10.5%
HOME IMPROVEMENT	166	5.8%	233	1.3%	71.2%
REFINANCE	2264	79.1%	13384	75.4%	16.9%
TOTAL	2863		17756		

Although home improvement loans may be a means for financially ailing homeowners to generate funds for needed repairs, in 2010 the denial rate for this type of loan was 71.2%. An important consideration in this area is the fact that about 32% of St. Charles County’s housing stock is over 30 years old and this type of application only represents 1.3% of all applications. However, reinvestment in the form of home improvement is crucial to maintaining the supply of homes. Furthermore, without improvements, homeowners will be unable to command a fair market value once they decide to sell. Rising denial rates on these types of loans may reflect changing policies in the lending industry, but this is an area that warrants some attention. The associated disinvestment can have an undesirable effect on the community when it occurs in great numbers.

When loans are denied, lenders record the reasons for these decisions. The chart above shows the percent of denials by reason for 2010 for all loans of all types. Overall, the most common reason for denying loans is the applicant’s credit history.

The following table presents the 2011 HMDA data for each census tract in St. Charles County. In the table, instances of high denial rates, high minority percentages, and low median incomes are highlighted in red. Instances of low denial rates, low minority percentages, and high median incomes are highlighted in green. High and low values were classified according to their deviation from the mean, with a central class defined as +/- 1.0 standard deviation and the high and low values defined as values lying outside 1.0 standard

deviation from the mean. Though HMDA and not Census data was used to designate the high minority tracts in the following table, the tracts identified by HMDA closely mirror the tracts identified using the Census data. The average mortgage denial rate for all tracts was 13.46% in 2011. Additionally, the average census tract had a minority population of 6.3% and a median income 119.6% of the median for the St. Louis MO-IL MSA as a whole.

## Mortgage Origination & Denial Rates by Census Tract – 2011

Census Tract Number	Total Applications	Loans Originated	Apps Approved, Not Accepted	Apps Denied	Apps Withdrawn	Files Closed For Incompleteness	Denial Rate	% Minority Population	Median Income as a % of MSA Median
101	108	60	3	27	17	1	25.00%	2	103
102	471	345	20	43	46	17	9.13%	5	104
103	327	228	12	41	41	5	12.54%	7	110
104	110	65	4	27	12	2	24.55%	6	82
105	223	152	9	41	20	1	18.39%	12	78
106	348	251	13	41	31	12	11.78%	6	137
107	108	72	3	16	17	0	14.81%	9	87
108	405	291	27	37	42	8	9.14%	6	108
109.01	115	64	6	16	21	8	13.91%	13	91
109.02	201	138	14	25	21	3	12.44%	8	114
109.03	156	128	3	10	10	5	6.41%	7	126
110	603	411	31	63	83	15	10.45%	8	102
111.03	560	427	16	57	37	23	10.18%	5	187
111.11	637	430	31	77	83	16	12.09%	7	150
111.12	577	399	13	93	48	24	16.12%	6	120
111.14	357	262	9	53	28	5	14.85%	6	146
111.21	595	454	20	63	47	11	10.59%	5	138
111.22	396	265	21	62	37	11	15.66%	8	112
111.24	390	294	11	33	35	17	8.46%	5	142
111.32	251	180	7	31	24	9	12.35%	4	146
111.34	594	447	31	54	45	17	9.09%	5	159
111.44	987	710	39	124	88	26	12.56%	5	143
112.03	364	245	12	59	35	13	16.21%	7	116
112.11	353	261	10	41	34	7	11.61%	8	117
112.12	180	119	7	19	27	8	10.56%	9	127
112.21	252	171	5	34	36	6	13.49%	6	122
112.92	431	302	14	54	49	12	12.53%	5	142
112.94	270	203	7	28	25	7	10.37%	7	135
113.11	308	196	12	37	50	13	12.01%	6	126
113.12	386	280	16	49	35	6	12.69%	6	125
113.22	393	269	11	60	42	11	15.27%	6	127
113.31	250	188	9	33	10	10	13.20%	5	122
113.91	320	224	13	32	44	7	10.00%	7	128
114.01	100	62	9	16	11	2	16.00%	7	77
114.12	111	56	7	26	18	4	23.42%	5	98
114.22	362	275	16	37	26	8	10.22%	5	120
115	25	13	0	7	4	1	28.00%	5	114
116	713	490	23	108	74	18	15.15%	6	102
117.11	371	250	17	48	35	21	12.94%	6	118
117.12	269	191	7	33	30	8	12.27%	6	104
117.21	247	177	12	32	17	9	12.96%	6	126
117.22	374	264	16	49	34	11	13.10%	6	98
117.31	849	650	34	85	58	22	10.01%	5	126
117.32	435	319	14	54	35	13	12.41%	6	120
118.01	359	244	18	40	38	19	11.14%	3	118
118.02	319	213	14	46	34	12	14.42%	6	100
119.01	700	503	20	92	61	24	13.14%	6	110
119.02	723	484	40	98	77	24	13.55%	4	159
119.03	371	233	13	58	47	20	15.63%	6	133
120.01	150	97	5	16	27	5	10.67%	2	118
120.92	514	353	21	71	54	15	13.81%	19	94
120.93	941	667	40	114	95	25	12.11%	4	131
121.02	735	502	38	97	80	18	13.20%	5	109
121.91	401	248	25	67	50	11	16.71%	9	111
122.01	357	258	11	45	33	10	12.61%	2	133
122.02	954	672	31	113	103	35	11.84%	5	105
<b>TOTAL</b>	<b>22,406</b>	<b>15,752</b>	<b>890</b>	<b>2,832</b>	<b>2,261</b>	<b>671</b>	<b>13.46%</b>	<b>6.3</b>	<b>119.6</b>

Based on the 2011 HMDA analysis, there is little data to suggest potential discrimination against minorities in the local mortgage market. Of six tracts with the highest minority populations, all but one (tract 105 in the City of St. Charles) had loan denial rates in the normal range. Of four tracts with the lowest minority populations, three had normal denial rates and one (tract 101 in the West Alton area) had a higher than average denial rate.

Of five tracts with high denial rates, only one (again, tract 105) also had a higher than average minority population; notably, this tract also had a low median income which could be a significant factor in the high denial rate. Of five tracts with unusually low denial rates, all had minority percentages in the average range and three had median incomes within the average. The other two low denial rate tracts had higher than average median incomes. The tract with the highest rate of loan denials (tract 115 in the Dardenne Lake area) had an average percentage of minorities and an average median income. Conversely, the tract with the lowest rate of loan denials (tract 109.03 in the City of St. Charles) also had an average percentage of minorities and an average median income.

## Affordable Housing Snapshot

Housing affordability is a significant factor for residents attempting to select housing that meets their family needs. HUD considers housing affordable if it costs less than 30 percent of a family's income<sup>23</sup>. Households that spend over that threshold tend to lack affordable housing and may be significantly cost burdened and may have difficulty affording basic necessities.

Yet, according to HUD, 12 million renters and homeowners in the United States spend more than 50 percent of their income on housing and a family with one full-time worker earning the minimum wage cannot afford the local fair-market rent for a two-bedroom apartment anywhere in the United States.<sup>24</sup> HUD's definition of "affordable housing" includes housing-related expenses such as rent and utilities.

On an annual basis, HUD calculates median family income for the metropolitan and other areas. The data is categorized based on its relationship to the median family income. The categories include: extremely low income (earning less than 30% of the MFI), very low-income (earning between 30% and 50% of the MFI), low-income (earning between 50% and 80% of the MFI). According to HUD, the 2012 Median Family Income (MFI) for households in St. Charles County is \$70,400.

**Table 18: FY 2012 Income Limits Summary for St. Charles County, MO**

FY 2012 Income Limits Summary - St. Charles County, Missouri										
FY 2012 Income Limit Area	Median Income	FY 2012 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
St. Charles County	\$70,400	<b>Very Low (50%) Income Limits</b>	\$24,650	\$28,200	\$31,700	\$35,200	\$38,050	\$40,850	\$43,650	\$46,500
		<b>Extremely Low (30%) Income Limits</b>	\$14,800	\$16,900	\$19,000	\$21,100	\$22,800	\$24,500	\$26,200	\$27,900
		<b>Low (80%) Income Limits</b>	\$39,450	\$45,050	\$50,700	\$56,300	\$60,850	\$65,350	\$69,850	\$74,350

\*Note: St. Charles County is part of the St. Louis, MO-IL Metro FMR Area. Information presented here applies to all of the St. Louis, MO-IL Metro FMR Area. FY 2012 Income Limits Summary Source: Department of Housing & Urban Development, HUD User Dataset, Income Limits, [www.huduser.org](http://www.huduser.org).

A community's housing needs change over time as the size and composition of the population evolves and housing preferences shift. Different social and economic factors may influence whether families choose to rent or buy, construct new homes or renovate old homes. The size and type of homes are also influenced by family size, householder age, and economic status.

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low-income households preventing them from meeting their other basic needs. The following section of this Analysis will present a housing snapshot for St. Charles County.

<sup>23</sup> U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/index.cfm>

<sup>24</sup> U.S. Department of Housing and Urban Development, <http://www.hud.gov/offices/cpd/affordablehousing/>

## Housing

As of THE 2010 Census, St. Charles County had a total of 141,016 housing units, of which 6,742 [4.8%] were vacant, a significant increase from 2000. As indicated by the 2000 Census figures, St. Charles County only had 105,514 housing units, of which 3,851 [3.6%] were vacant. The rate of housing vacancy has varied in St. Charles County since 1980, with the lowest vacancy rate noted in 2000 at 3.6%. The highest rate of vacancy was 6.2% in 1980.

**Table 19: St. Charles County Housing Unit Analysis**

	1980	1990	2000	2010	2011
<b>Total Housing Units</b>	49,523	79,113	105,514	141,016	142,739
<b>Occupied</b>	46,471	74,331	101,663	134,274	134,778
<b>Vacant</b>	3,052	4,782	3,851	6,742	7,961
<b>Vacancy Rate</b>	6.2%	6.0%	3.6%	4.8%	5.6%

St. Charles County Housing Unit Analysis

Source: U.S. Census Bureau, American Community Survey Decennial & 1-Year Estimates

From 1980 to 2010 the total number of housing units in St. Charles County increased by 91,493 units or 185%. During this 30 year period, the decade of 2000 to 2010 recorded the largest increase in homes constructed with 35,502 units. This was preceded by the decade of 1980 to 1990 with 29,590 housing units constructed.

According to the 2011 ACS estimates, St. Charles had a total of 142,739 housing units, of which 7,961 [5.6%] were vacant. Of the total housing units, 114,441 [80.2%] were single-family attached or detached units, while 23,959 [16.8%] were multi-family units and 4,263 [3%] were mobile homes.

**Table 20: Housing Unit Analysis for St. Charles**

<b>St. Charles County Housing Unit Analysis</b>		
<b>Units in Structure</b>	<b>St. Charles County</b>	<b>Percent</b>
<i>Total housing units</i>	142,739	100%
1-unit, detached	104,358	73.1%
1-unit, attached	10,083	7.1%
2 units	3,459	2.4%
3 or 4 units	5,344	3.7%
5 to 9 units	4,268	3.0%
10 to 19 units	5,489	3.8%
20 or more units	3,696	2.6%
50 or more units	1,703	1.2%
Mobile home	4,263	3.0%
Boat, RV, van, etc.	76	0.1%

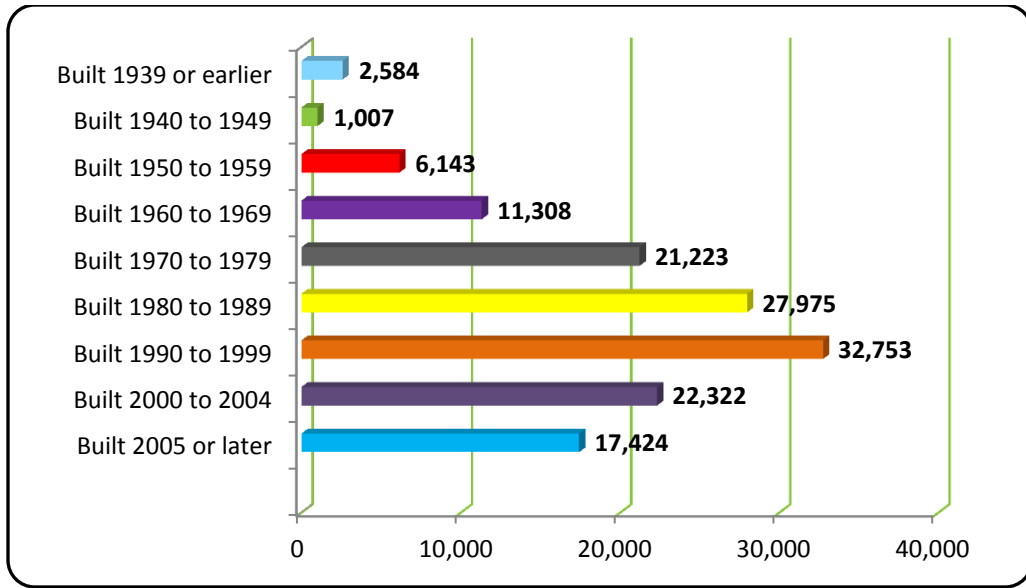
TABLE 21: St. Charles County Housing Unit Analysis

Source: U.S. Census Bureau, 2011 American Community Survey 1-Year

## Housing Conditions

The age of the housing stock in St. Charles County has a significant impact on the housing conditions in the area. A significant portion of the housing stock in St. Charles County has aged, with nearly 30% of units built before 1980. As housing ages, maintenance costs also rise which can present significant cost issues for low and moderate homeowners.

**Figure 22: St. Charles County Housing Stock**



St. Charles County Housing Stock  
Source: U.S. Census Bureau, 2011 American Community Survey

According to the 2011 ACS, the median value for a home in St. Charles County was \$185,500 with 34,537 [31.7%] homes ranging in value between \$150,000 and \$199,999. The second most common range of home values was \$100,000 to \$149,999, comprising 20% of all owner-occupied units. Approximately 44,961 [41.2%] of all homes within the County were valued at over \$200,000.

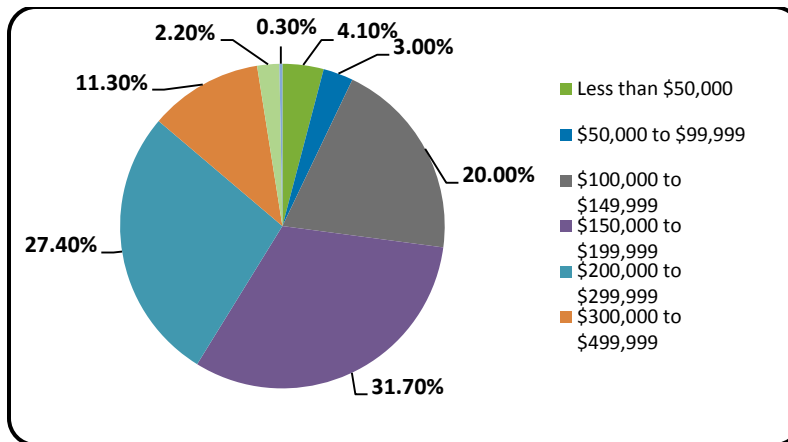
**Table 22: St. Charles County Home Values**

<b>St. Charles County Home Values</b>		
<b>Total Owner-Occupied Units</b>	<b>109,035</b>	<b>100%</b>
Less than \$50,000	4,442	4.10%
\$50,000 to \$99,999	3,299	3.00%
\$100,000 to \$149,999	21,796	20.00%
\$150,000 to \$199,999	34,537	31.70%
\$200,000 to \$299,999	29,898	27.40%
\$300,000 to \$499,999	12,319	11.30%
\$500,000 to \$999,999	2,445	2.20%
\$1,000,000 or more	299	0.30%

St. Charles County Home Values  
Source: U.S. Census Bureau, 2011 American Community Survey



**Figure 23: St. Charles County Home Values**



St. Charles County Home Values. Source: U.S. Census Bureau, 2011 American Community Survey

A six year comparison of the median sales price of homes sold in St. Charles County reflects a continuing decline in home prices in the area. In 2006, 10,627 homes were sold with a median sales price of \$171,500. In 2011, only 5,809 homes were sold and the median sales price was \$148,900.

**Table 23: St. Charles County Median Sales and Price Comparison by Year**

Number of Home Sales	2006	2007	2008	2009	2010	2011
Number of Sales	10,627	9,102	6,307	4,656	6,648	5,809
Median Price	\$171,500	\$173,000	\$165,000	\$158,000	\$167,000	\$148,900

Median Sales Price Comparison By Year  
Source: Policy Map - www.policymap.com

**Table 24: Market Statistics St. Charles County, September 2012**

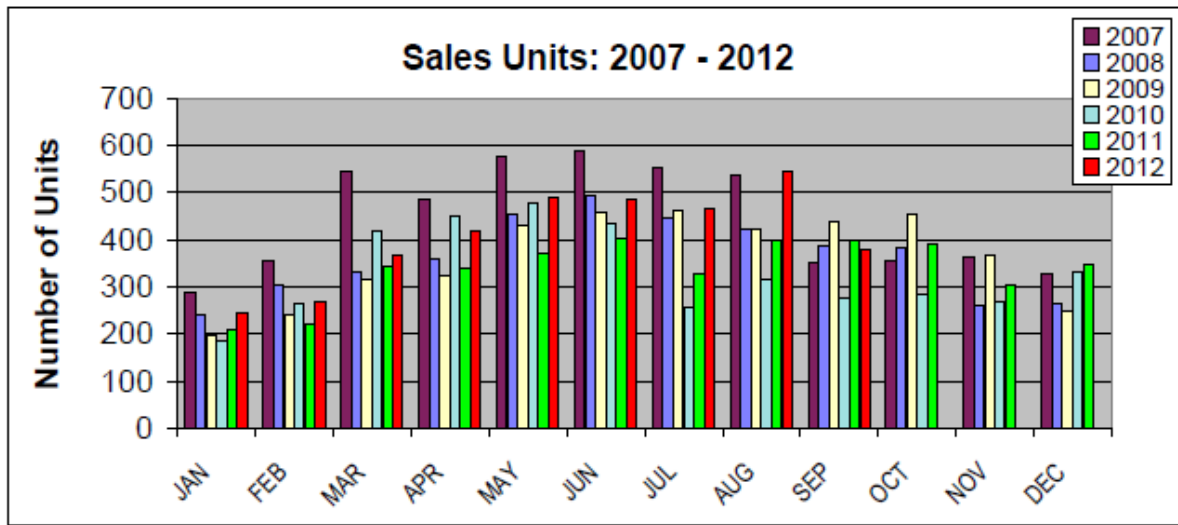
	Monthly Snapshot				YTD Snapshot			
	Sep 2012	Sep 2011	Comparison	% Change	YTD 2012	YTD 2011	Comparison	% Change
Units Sold	378	398	(20)	-5.03%	3,660	3,009	651	21.64%
Median Sale Price	159,200	154,500	4,700	3.04%	160,000	157,250	2,750	1.75%
DOM	72	103	(31)	-30.10%	78	100	(22)	-22.00%
Volume	70,038,694	69,835,425	203,269	0.29%	662,657,883	534,705,441	127,952,442	23.93%
Pending Sales	407	404	3	0.74%	3,939	3,327	612	18.39%
Active	688	563	125	22.20%	6,479	6,244	235	3.76%

Market Statistics St. Charles County  
Source: St. Charles County, MO Association of Realtors,

[http://www.stcharlesrealtors.com/pics/db/document\\_library/923\\_September2012SalesSnapshot.pdf](http://www.stcharlesrealtors.com/pics/db/document_library/923_September2012SalesSnapshot.pdf)

While the median sales price is up in 2012 over the same period last year, the market statistics reflect that, to date, 651 more homes have been sold compared to same period last year which is an increase of over 21% in sales of housing units in St. Charles County.

**Figure 24: Market Statistics St. Charles County**



Source: St. Charles County, Mo Association of Realtors,  
[http://www.stcharlesrealtors.com/pics/db/document\\_library/923\\_September2012SalesSnapshot.pdf](http://www.stcharlesrealtors.com/pics/db/document_library/923_September2012SalesSnapshot.pdf)

According to the St. Charles County Association of Realtors’ annual Residential Sales by Price report, a total of 4,047 single-family detached homes were sold between October 2011 and September 2012. The highest percentage of homes sold were those valued at \$150,000 or less at 39.7% of all sales.

**Table 25: Market Statistics Residential Sales by Price October 2011 – September 2012**

Price Range		Sold	%	Median Sale Price
1	150,000	1605	39.7%	109,983
150,001	200,000	1091	27.0%	175,645
200,001	250,000	568	14.0%	226,725
250,001	300,000	360	8.9%	275,250
300,001	350,000	180	4.4%	326,000
350,001	400,000	98	2.4%	375,000
400,001	450,000	59	1.5%	425,875
450,001	500,000	23	0.6%	480,669
500,001	& up	63	1.6%	750,100
<b>Total Sales</b>		<b>4,047</b>		

Market Statistics Residential Sales By Price: St. Charles County  
 Source: St. Charles County, Mo Association of Realtors,  
[http://www.stcharlesrealtors.com/pics/db/document\\_library/923\\_September2012SalesSnapshot.pdf](http://www.stcharlesrealtors.com/pics/db/document_library/923_September2012SalesSnapshot.pdf)

### Household Income Costs

As indicated in the Affordability Snapshot table, St. Charles County has a significant percentage of homeowners spending more than 30% of their annual household income on housing-related costs. According to the 2011 ACS, 26.5% of homeowners with a mortgage pay more than 30% of their income on monthly housing costs. Conversely, 39.8% of renters spent more than 30% of their income on rent.

**Table 26: Affordability Snapshot for St. Charles County**

<b>St. Charles County Affordability Snapshot</b>		
<b>Value</b>	<b>Estimate</b>	<b>Percent</b>
Median (dollars)	185,500	
<b>MORTGAGE STATUS</b>		
Owner-occupied units	109,035	
Housing units with a mortgage	83,372	76.5%
Housing units without a mortgage	25,663	23.5%
<b>SELECTED MONTHLY OWNER COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME</b>		
Housing units with a mortgage	83,184	
Less than 20.0 percent	36,951	44.4%
20.0 to 24.9 percent	14,481	17.4%
25.0 to 29.9 percent	9,701	11.7%
30.0 to 34.9 percent	6,212	7.5%
35.0 percent or more	15,839	19.0%
Housing unit without a mortgage	25,623	
Less than 10.0 percent	9,401	36.7%
10.0 to 14.9 percent	5,904	23.0%
15.0 to 19.9 percent	3,814	14.9%
20.0 to 24.9 percent	2,004	7.8%
25.0 to 29.9 percent	1,305	5.1%
30.0 to 34.9 percent	1,032	4.0%
35.0 percent or more	2,163	8.4%
<b>GROSS RENT</b>		
Occupied units paying rent	25,047	100%
Less than \$200	244	1.0%
\$200 to \$299	62	0.2%
\$300 to \$499	1,604	6.4%
\$500 to \$749	7,508	30.0%
\$750 to \$999	7,195	28.7%
\$1,000 to \$1,499	5,892	23.5%
\$1,500 or more	2,542	10.1%
Median (dollars)	840	
<b>GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME</b>		
Occupied units paying rent	24,310	100%
Less than 15.0 percent	2,359	9.7%
15.0 to 19.9 percent	5,389	22.2%
20.0 to 24.9 percent	4,278	17.6%
25.0 to 29.9 percent	2,597	10.7%
30.0 to 34.9 percent	2,849	11.7%
35.0 percent or more	6,838	28.1%

St. Charles County Affordability Snapshot Source: U.S. Census Bureau, 2011 American Community Survey

### ***Rental Housing Affordability***

The U.S. Census tabulates housing payments for renter occupied housing units by household income range, providing an estimate of the number of households with excessive cost burdens. Affordable rent is generally categorized as 30% of total monthly income. As the St. Charles County Affordability Snapshot illustrates, about 9,687 [39.8%] renter households pay 30% or more of their income on rent. According to the 2011 American Community Survey, it is estimated that 30.8% or 25,623 households rented their homes.

The National Low Income Housing Coalition's "*Out of Reach*" 2012 Annual Report calculates the amount of money a household must earn in order to afford a rental unit at the Fair Market Rent (FMR), consistent with HUD's affordability standard of paying no more than 30% of income for housing costs.

St. Charles County's Fair Market Rent (FMR) for a two-bedroom apartment is \$792 and in order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,640 monthly or \$31,680 annually<sup>25</sup>. Similarly, the FMR for a three-bedroom apartment is \$1,020 and a household must earn at least \$3,400 monthly or have an annual income of \$40,800 to make such a unit affordable.<sup>26</sup>

In order to afford the current FMR for a two-bedroom apartment in St. Charles County, a minimum wage worker who earns an hourly wage of \$7.25 must work 84 hours per week, for 52 weeks per year or must have a household consisting of 2.1 minimum wage earners. The affordability data for three-bedroom units indicate more significant cost burdens. A minimum wage worker must work 108 hours per week or have a household consisting of 2.7 minimum wage earners to afford the current FMR for a three-bedroom apartment.

As depicted in the St. Charles County Renter Affordability table, 42% of County residents are unable to afford a two bedroom rental unit at the fair market rent as assessed by HUD.

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<sup>25</sup> National Low Income Housing Coalition, "Out of Reach" 2012 Annual Data, <http://www.nlihc.org/>

<sup>26</sup> Ibid

**Table 27: St. Charles County Renter Affordability**

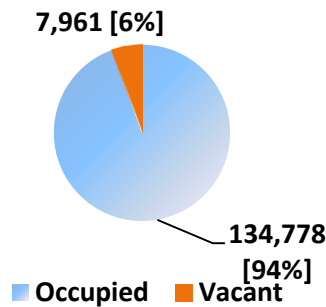
Household Characteristics	Missouri	St. Charles County, MO
<b>Number of Households (2006-2010)</b>		
Total	2,349,955	130,973
Renter	704,933	23,628
% Renter	30%	18%
<b>Minimum Wage, Mean Renter Wage, SSI Monthly Payment</b>		
Minimum wage	\$7.25	\$7.25
Estimated mean renter wage	\$11.73	\$9.83
SSI monthly payment	\$698	\$698
<b>2012 Fair Market Rent (FMR)</b>		
One-Bedroom	\$566	\$638
Two-Bedroom	\$693	\$792
Three-Bedroom	\$919	\$1,020
Four-Bedroom	\$994	\$1,068
<b>Annual Area Median Income</b>		
Annual AMI	\$62,608	\$70,400
30% of AMI (Extremely Low Income)	\$18,782	\$21,120
Estimated renter median income	\$26,508	\$37,873
Rent affordable at renter median income	\$663	\$947
<b>Maximum Affordable Monthly Housing Cost by % of AMI</b>		
Rent affordable at 30% of AMI	\$470	\$528
Rent affordable at 50% of AMI	\$783	\$880
Rent affordable at 80% of AMI	\$1,252	\$1,408
Rent affordable at median income	\$1,565	\$1,760
Rent affordable with full-time job paying min wage	\$377	\$377
Rent affordable with full-time job paying mean renter wage	\$610	\$511
Rent affordable to SSI recipient	\$209	\$209
<b>Annual Income Needed to Afford FMR</b>		
Income needed to afford 1 bdrm	\$22,659	\$25,520
Income needed to afford 2 bdrm	\$27,737	\$31,680
Income needed to afford 3 bdrm	\$36,756	\$40,800
Income needed to afford 4 bdrm	\$39,765	\$42,720
<b>Percent of AMI Needed to Afford FMR</b>		
Percent of AMI needed to afford 1 bdrm	36%	36%
Percent of AMI needed to afford 2 bdrm	44%	45%
Percent of AMI needed to afford 3 bdrm	59%	58%
Percent of AMI needed to afford 4 bdrm	64%	61%
<b>Housing Wage to Afford FRM</b>		
Housing Wage for 1 bdrm	\$10.89	\$12.27
Housing Wage for 2 bdrm	\$13.34	\$15.23
Housing Wage for 3 bdrm	\$17.67	\$19.62
Housing Wage for 4 bdrm	\$19.12	\$20.54
<b>Work Hours per Week at Minimum Wage to Afford FRM</b>		
Work hours per week at min. wage needed to afford 1 bdrm	60	68
Work hours per week at min. wage needed to afford 2 bdrm	74	84
Work hours per week at min. wage needed to afford 3 bdrm	97	108
Work hours per week at min. wage needed to afford 4 bdrm	105	113
<b>Full time Jobs Minimum Wage Needed to Afford FRM</b>		
Full-time jobs at min. wage needed to afford 1 bdrm	1.5	1.7
Full-time jobs at min. wage needed to afford 2 bdrm	1.8	2.1
Full-time jobs at min. wage needed to afford 3 bdrm	2.4	2.7
Full-time jobs at min. wage needed to afford 4 bdrm	2.6	2.8
<b>Full time Jobs Mean Renter Wage Needed to Afford FRM</b>		
Full-time jobs at mean renter wage needed to afford 1 bdrm	0.9	1.2
Full-time jobs at mean renter wage needed to afford 2 bdrm	1.1	1.6
Full-time jobs at mean renter wage needed to afford 3 bdrm	1.5	2.0
Full-time jobs at mean renter wage needed to afford 4 bdrm	1.6	2.1
Estimated percent of renters unable to afford 2 bdrm	51%	42%

St. Charles County Renter Affordability  
 Source: National Low Income Housing Coalition, "Out of Reach" 2012 Annual Data, <http://www.nlihc.org/>

### Vacancy

According to the 2011 ACS, the overall vacancy rate for renter and owner housing units in St. Charles County was 5.6%. By comparison, the 2010 Census indicated 4.8% of housing units were vacant. Low vacancy rates are reflective of high demand, which will continue to add pressure to increase rents. Low vacancy rates could also indicate prospective renters, particularly low-income renters, may have a difficult time finding suitable and affordable housing in St. Charles County.

**Figure 25: St. Charles County Occupied and Vacant Housing**



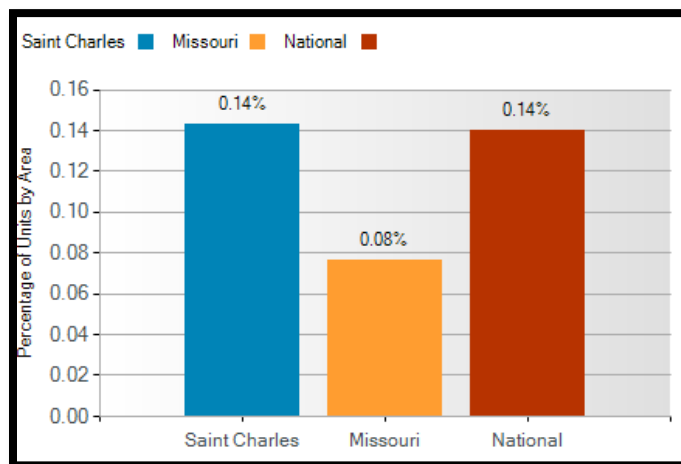
**St. Charles County Occupied and Vacant Housing**

Source: U.S. Census Bureau, 2011 American Community Survey, [www.census.gov](http://www.census.gov)

### Foreclosure Data

The national housing market has experienced a severe downturn due in part to lending disruptions and high unemployment rates. Additionally, foreclosure rates have also increased due to the high quantity of sub-prime mortgages and adjustable-rate mortgages that were issued during the housing boom. Based on Realty Trac’s geographical foreclosure comparison, St. Charles County has a higher percentage of foreclosure units than the state average and an equal percentage when compared to the national average.

**Figure 26: St. Charles County Foreclosure Comparison**

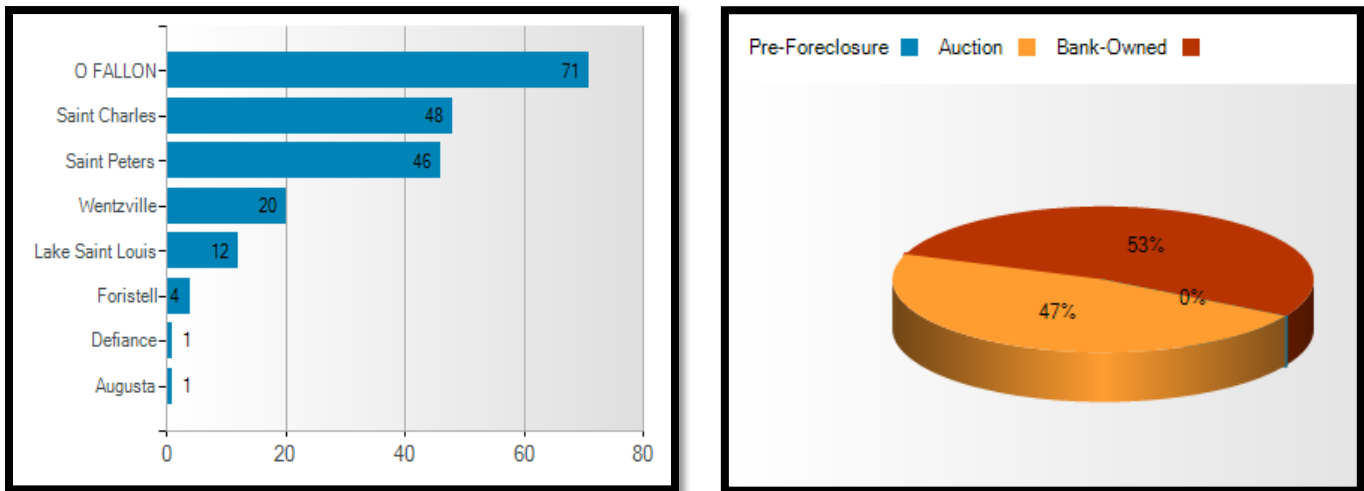


**St. Charles County Foreclosure Comparison**

Source: Realty Trac, August 2012 Real Estate Trends, [www.realtytrac.com](http://www.realtytrac.com)

The 2011 ACS estimated that St. Charles County had 109,035 owner-occupied housing units, 1,280 of which were in foreclosure according to Realty Trac’s November 2012 foreclosure data. The average foreclosure sales price in St. Charles County as of November 2012 was \$142,872<sup>27</sup>. Realty Trac’s foreclosure activity count as of November 2012 reflects 203 new foreclosures on the market in St. Charles County, of which a large percentage were bank-owned.

**Figure 27: St. Charles County Foreclosure Rate Comparison**



St. Charles County Foreclosure Rate Comparison Source: Realty Trac, November 2012 Real Estate Trends, [www.realtytrac.com](http://www.realtytrac.com)

**Public Housing**

The subsidized Housing Choice Voucher rental assistance program enables a jurisdiction to provide affordable housing options for very low-income households. A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the property owner agrees to participate in the program. Rental units are required to meet HUD minimum housing standards, as determined by the public housing agency (PHA). In many cases the housing subsidy is paid directly to the landlord by the PHA on behalf of the participating family. The family will then pay the difference between the actual rent charged by the landlord and the amount subsidized by the program each month. Under certain circumstances, if authorized by the PHA, a family may use its voucher to purchase a modest home. Since the demand for housing assistance often exceeds the limited resources of local housing authorities, long waiting lists are common.

The Northeast Community Action Corporation (NECAC) serves as St. Charles County’s Public Housing Agency and administers Housing Choice Vouchers for St. Charles County. NECAC’s mission is to “assist the disadvantaged residents within the Counties of Lewis, Lincoln, Macon, Marion, Monroe, Montgomery, Pike, Ralls, Randolph, Shelby, St. Charles, and Warren to rise above poverty by providing needed services to enable each individual to function at his or her own improved financial, physical, mental and social level.”<sup>28</sup>

<sup>27</sup> Realty Trac, November 2012 Real Estate Trends, [www.realtytrac.com](http://www.realtytrac.com)

<sup>28</sup> North East Community Action Corporation, <http://www.necac.org/Pages/index.aspx>

NECAC allows participants to select any type of single family housing available in the county that meets HUD inspection standards.

As of 2010, there were 662 St. Charles County families enrolled in the NECAC's Housing Assistance Program and receiving Housing Choice Vouchers According to HUD's 2009 Picture of Subsidized Households, St. Charles County had a total of 2,661 low income persons who were served through public housing units or housing choice voucher programs.

**Table 28: Affordable Housing Inventory in St. Charles County**

<b>St. Charles County Affordable Housing Inventory</b>		
	<b>Public Housing</b>	<b>Housing Choice Vouchers</b>
Total Units	70	-
% Occupied	100%	-
% Disabled	4%	16%
% Minority	75%	35%
% Black	72%	32%
% Hispanic	1%	2%
Total Persons Housed	227	2,434
Months from Move-In	32	73

St. Charles County Public Housing Inventory

Source: Picture of Subsidized Households for 2009 <http://www.huduser.org/portal/picture/picture2009.html>



According to HUD's Low Income Housing Tax Credit (LIHTC) database, St. Charles County has several affordable housing developments funded by Low Income Housing Tax Credits providing 1,508 affordable housing units, as shown in the following table.

**Table 29: St. Charles County Low Income Tax Credit Projects**

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
MOA1988505	705 FERNWOOD TERRACE DR.	705 Fernwood Ter	LAKE SAINT LOUIS	MO	63367	1	1
MOA1989396	703 FERNWOOD TERRACE DR.	703 FERNWOOD TER	LAKE SAINT LOUIS	MO	63367	1	1
MOA1989400	704 FERNWOOD TERRACE DR.	704 FERNWOOD TER	LAKE SAINT LOUIS	MO	63367	1	1
MOA1994005	1414 COCO PLACE	1414 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1994010	1416 COCO PLACE	1416 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1994015	1418 COCO PLACE	1418 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1994020	1420 COCO PLACE	1420 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1994025	1422 COCO PLACE	1422 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1994030	1424 COCO PLACE	1424 COCO PL	WENTZVILLE	MO	63385	1	1
MOA1995185	HIDDEN TERRACE TOWNHOMES	2500 FALCONS WAY	SAINT CHARLES	MO	63303	40	40
MOA1996315	ST. PETERS VILLA	500 STARWOOD DR	SAINT PETERS	MO	63376	54	54
MOA2000005	ASHWOOD APARTMENTS	1500 PARK ASHWOOD CIR	SAINT CHARLES	MO	63304	276	276
MOA2002055	CATERBURY PARK APARTMENTS	1001 HIGHWAY 79	SAINT PETERS	MO	63376	66	66
MOA2004130	HIDDEN VALLEY ESTATES	1290 EVERGREEN CT	WENTZVILLE	MO	63385	200	200
MOA2004132	HIDDEN VALLEY ESTATES	1001 HIDDEN VALLEY DR	WENTZVILLE	MO	63385	200	200
MOA2005130	PEINE LAKES APTS	2010 PEINE RD	WENTZVILLE	MO	63385	256	256
MOA2006090	PEINE LAKES APARTMENTS	1111 PEINE LAKES DR	WENTZVILLE	MO	63385	256	256
MOA2006135	WYNDHAM PARK	400 WYNDHAM PARK DR	SAINT PETERS	MO	63376	60	60
MOA2006147	HICKORY HOLLOW	122 HICKORY TRL	WENTZVILLE	MO	63385	37	37
MOA2007215	WYNDHAM PARK II	100 Wyndham Park Dr.	SAINT PETERS	MO	63376	54	54
<b>TOTAL UNITS</b>						<b>1508</b>	<b>1508</b>

St. Charles County LIHTC

Source: HUD Low-Income Housing Tax Credit Database, <http://lihtc.huduser.org/>

**Persons with Disabilities & Elderly**

HUD’s Inventory Survey of Units for the Elderly and Disabled lists several multi-family housing units that serve the elderly population and persons with disabilities. These units tend to offer rental assistance or other housing subsidy programs. The properties, listed below, have a combined 734 assisted units in service. Out of the 734 assisted units, 57 (7%) units are designated specifically for elderly and 28 (3%) units are designated specifically for disabled persons.

**Table 30: Multifamily Housing Inventory of Survey of Units for the Elderly and Disabled Persons - St. Charles County, MO**

Property Name	Address	Occupancy Eligibility	Total Units	Total Assisted Units	Total Units Designated for Elderly	Total Units Designated for the Disabled	Total Units with Accessible Features	Available Bedroom Sizes	Survey Date
Church Street Village	615 S. Church St. SAINT PETERS, MO 63376-0000	Elderly and Disabled	58	57	57	0	5	1-BR, 2-BR	39897
Fox Hill Apartments	3100- Fox Chase Dr. SAINT CHARLES, MO 63301-8385	Family	160	160	0	6	6	1-BR, 2-BR, 3-BR, 4-BR	38755
Fox Hill Apartments	3100- Fox Chase Dr. SAINT CHARLES, MO 63301-8385	Family	160	157	0	6	6	1-BR, 2-BR, 3-BR, 4-BR	39854
Fox Hill Apartments	3100- Fox Chase Dr. SAINT CHARLES, MO 63301-8385	Family	160	160	0	6	6	1-BR, 2-BR, 3-BR, 4-BR	40240
Hidden Valley Estates	1290 Evergreen Crt. WENTZVILLE, MO 63385-2881	Family	200	200	0	10	10	2-BR, 3-BR, 4-BR	40003
Waterways of Lake St. Louis	100 Big River Dr. LAKE SAINT LOUIS, MO 63367	Family	344	0	0	0	11	1-BR, 2-BR, 3-BR	40312
Woods Mill Park	13464 Post RD SAINT LOUIS COUNTY, MO 63141-7227	Family	140	0	0	0	0	1-BR, 2-BR, 3-BR	38931
<b>TOTALS</b>			<b>1,222</b>	<b>734</b>	<b>57</b>	<b>28</b>	<b>44</b>		

HUD’s MFH Inventory Survey of Units for the Elderly and Disabled. Source: <http://www.hud.gov/offices/hsg/mfh/hsgrent.cfm>

The map below displays the distribution of St. Charles County’s HUD multifamily properties and LIHTC properties.



## Infrastructure

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### Transportation

Transportation links are essential components to successful fair housing. The issue at hand regarding transportation and fair housing choice revolves around the ease with which a resident can travel from home to work if he or she lives in a lower income area or an area of minority concentration. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas. Convenient roads in good repair are as important as those who rely on their own vehicles for transportation as they are for those who rely on public transportation.

Public transportation can play a significant role in increasing access to the supply of affordable housing to groups in need and others protected under fair housing laws. But if public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities.

Except for bus service within the City of St. Charles, there is no public transit system within St. Charles County and the participating jurisdictions within the urban county. A St. Charles County Transit Plan for Intra-County Bus Service was presented to the St. Charles County Council on August 7, 2007. The plan was prepared by the East-West Gateway Council of Governments. The transit service envisioned consisted of a trunk line bus service in the I-70 corridor from the City of St. Charles to Mid Rivers Mall, and a west section that would run from Mid Rivers Mall to Wentzville. The plan's buses were scheduled to run once an hour from 6:00 a.m. to 7:00 p.m. on weekdays. The buses would make stops for passengers at all locations listed on the schedule, at all major intersections, and at other selected locations, such as large commercial developments and medical facilities. The St. Charles County Council has taken no action on this proposed plan for transit service.

The City of St. Charles operates a five-route transportation system known as SCAT (St. Charles Area Transit). Four routes of the bus system operate Monday through Friday from 9 a.m. to 4 p.m. within the city limits of St. Charles. The four are designated as the blue route, the red route, the green route, and the orange route. All four are fixed/deviation routes providing transportation to medical facilities, shopping centers, financial institutions, and other various points in the city. The city's bus fleet is wheelchair accessible. For those individuals needing deviation from the city's fixed route operation, they must contact the city's Public Works Department 24 hours in advance of the anticipated ride to ensure pickup. The City of St. Charles also offers early morning and late afternoon bus service to and from the North Hanley Road Metro station in St. Louis County. Five morning runs transverse from locations within the city to the Metro station, and five afternoon runs return from the Metro station to St. Charles locations.

The city of St. Peters contracts with a transportation provider to provide transportation service primarily for the elderly and disabled populations of the community. The service is demand response with appointment services provided Monday through Saturday. The fee for the transportation service is based upon a grid system of length of travel. The service is subsidized through contractual agreement with the

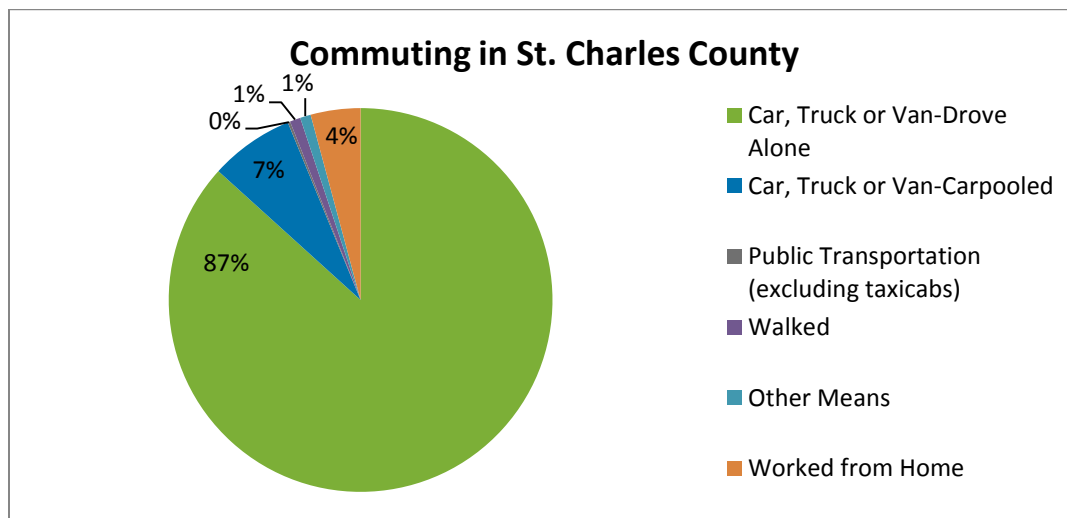
city. The county will also be offering a similar program for the urban county utilizing CDBG funding starting in 2012.

Four companies within St. Charles County provide taxicab service. These are Ace Cab Company, County Cab of St. Charles County, O'Fallon Cab, and St. Charles Yellow Cab.

While St. Charles County does not operate a public transit system, other transportation modes exist, such as driving, carpooling, biking and walking. The most common choice for commuting to work is driving alone. According to the 2010 American Community Survey estimates, 93.9% of workers using a private automobile for daily transportation to work from within St. Charles County.

As depicted in the following figure, 86.8% of residents in St. Charles County commute to work using a car, truck, or van and drove alone; 7.1% commute to work by carpooling; 0.2% commute to work by public transportation; 0.9% commute to work by walking; 0.9% commute by other means; and 4.2% of residents worked from home.

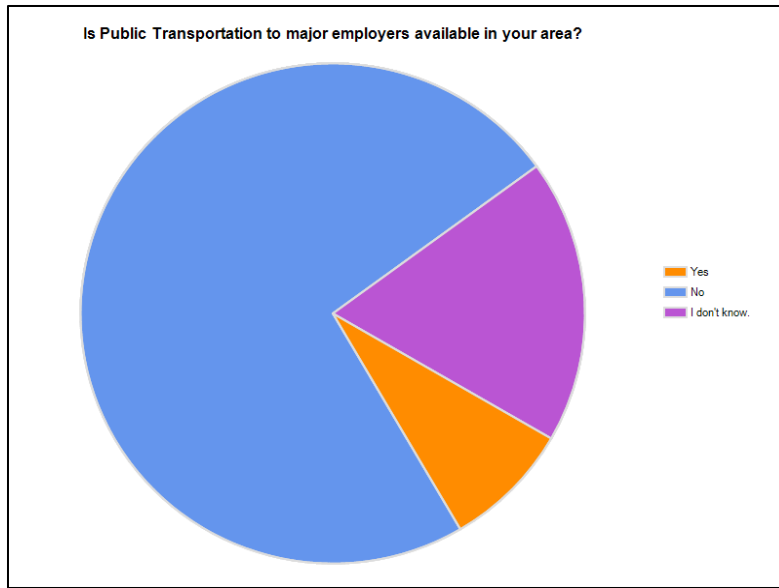
**Figure 29: St. Charles County Transportation Highlights**



Source: U.S. Census Bureau, American Community Survey 2006-2010 [www.census.gov](http://www.census.gov)

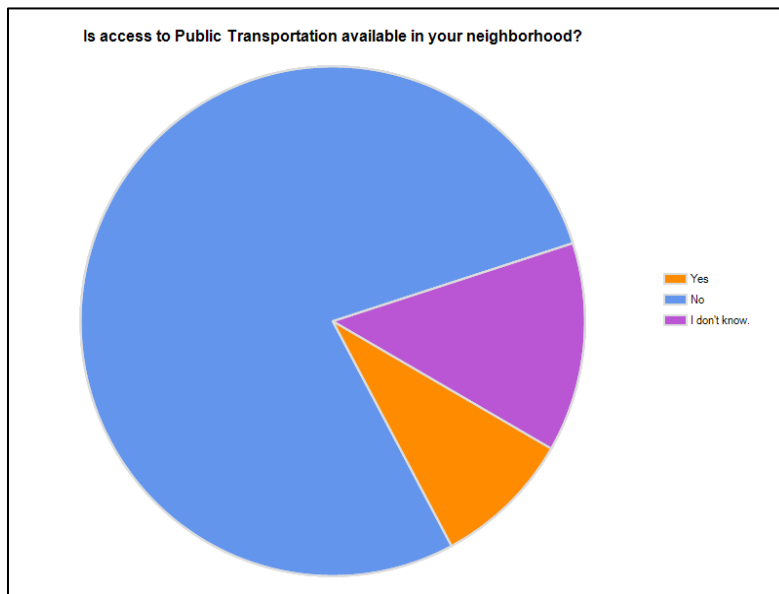
A public survey was conducted for the residents of St. Charles County, both through written or online surveys, where 177 responses were received to this survey. There were several questions related to the accessibility of public transportation within their neighborhoods. Of the respondents to the survey, 73.4% said that public transportation is not available to their employer. This related to 77.8% of residents stating that public transportation was not available within their neighborhoods.

**Figure 30: Transportation to Employers for St. Charles County Residents**



Source: Fair Housing Survey

**Figure 31: Public Transportation for Neighborhood Residents in St. Charles County**



Source: Fair Housing Survey

## Water & Sewer Infrastructure

There are currently five providers of water and sewer services to residents of St. Charles County. Together, these providers ensure that an adequate supply of water and sewer services is provided throughout the County.

**Table 31: St. Charles County Water and Sewer Providers**

St. Charles County Water and Sewer Providers
Public Water Supply District No.2
City of Wentzville
Alliance Water Resources
Duckett Creek
Missouri American Water

Source: St. Charles County, Missouri, [www.sccmo.org/residents](http://www.sccmo.org/residents)

The Public Water Supply District No. 2 currently serves over 75,000 customers throughout St. Charles County. The Public Water Supply District No. 2 also sells water to the City of Wentzville, where over 10,000 customers are served through water purchases. Beginning in 2011, the City of Wentzville began a \$20 million project to expand the Wastewater Treatment Plant and the addition of the Prospect Road Pump Station. Alliance Water Resources provides municipal water services throughout St. Charles County, although the exact numbers of residents served are unknown due to their large services areas and resale of water resources to various jurisdictions. The Duckett Creek Sanitary District's Western District serves the southern portion of the County, as shown in the figure below. Also providing water services to the residents of St. Charles County is Missouri American Water. Due the large network served, with over 15 million clients throughout the United States, there are no specific numbers available of those customers that live within St. Charles County.

### **Summary of Findings**

The lack of access to efficient and convenient public transportation was an often-cited complaint in the public meetings and interviews conducted in the course of this analysis. Data gathered through the Fair Housing Survey further underscores this need. Inadequate public transportation options for those without the ability to drive or access to other options significantly limits the housing choices of St. Charles County residents, particularly the very low-income, the elderly, and persons with disabilities.

As St. Charles County has grown over the last decade some unique needs of its community have been identified and strategies to overcome these needs to be implemented. The assessment of transportation in St. Charles County did not reveal any specific impediments to fair housing for residents but it must be noted that access to public transportation is a catalyst for the growth of affordable housing opportunities in most communities. Efforts to relieve these effects, such as the proposed intra-county bus service and St. Peters' planned expansion of its subsidized demand-response system for the elderly and disabled should be supported.

The assessment of St. Charles County's water and sewer infrastructure did not reveal any impediments to fair housing, as the range of service providers creates a healthy level of competition and provides residents options.

## Land Use & Zoning

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Comprehensive planning is a critical means by which governments address the interconnection and complexity of their respective jurisdictions. The interconnectedness of land uses means that a decision as to the use of a particular piece of property has consequences not only for surrounding property, but for a myriad of other issues as well. For example, a decision to use a parcel of land for development of a shopping mall (a land use decision) will alter the values and uses of surrounding property. The same decision may also impact traffic patterns or increase environmental concerns by increasing impervious areas and runoff. For this reason, “[t]he land-use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”<sup>30</sup> By extension, decisions regarding land use and zoning can have profound impact on affordable housing and fair housing choice, as will be discussed within this section.

From a regulatory standpoint, local governments are tasked with implementing measures to control land use through zoning, which often define the range and density of housing resources that can be introduced into a community. In communities across the United States (but not necessarily in St. Charles County), the zoning provisions that most commonly result in impediments to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or require inordinately large lot sizes that deter affordable housing development.
- Restrictive definitions of group homes that may impede unrelated individuals from sharing a dwelling unit.
- Placing administrative and siting constraints on group homes.

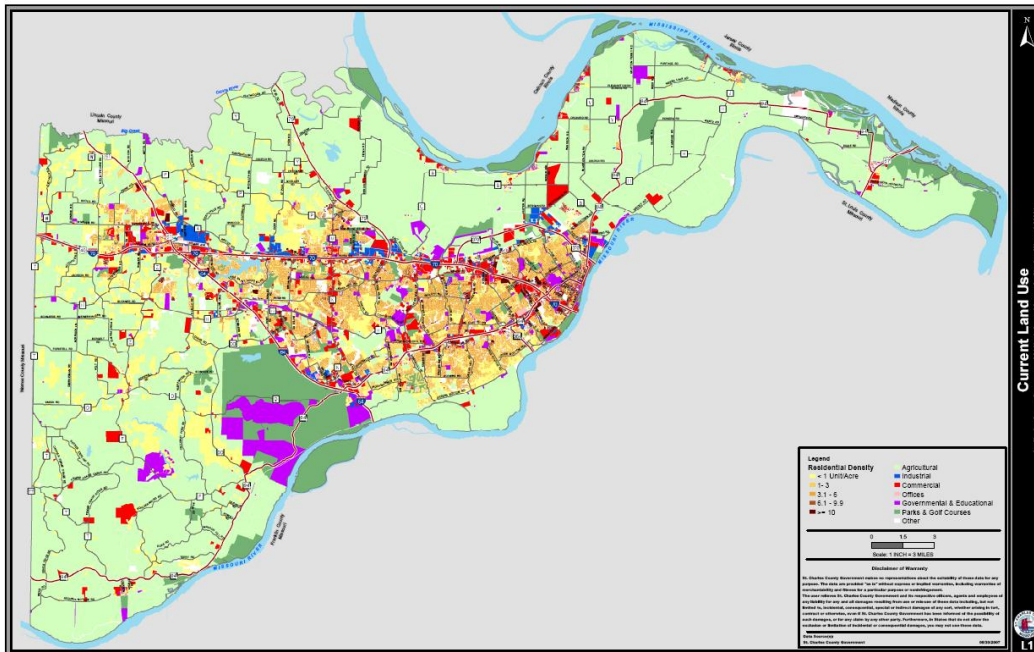
The zoning ordinances of St. Peters, Wentzville, Lake St. Louis, Weldon Spring, Dardenne Prairie, Cottleville and unincorporated St. Charles County were reviewed. A zoning and current land use map for all of St. Charles County is shown below:

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<sup>30</sup> John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.



**Figure 32: St. Charles County Current Land Use Map**



Source: St. Charles County Master Plan Envision 2020, [www.cd.sccmo.org](http://www.cd.sccmo.org)

### **Definition of “Group Home”**

Each zoning ordinance within the County contains a definition of a “group home,” and the requirements of such in each of the zoning areas. The unincorporated parts of St. Charles County, through the UDO, define it as follows:

*GROUP HOME FACILITY: A non-medical facility providing shelter, counseling and, where necessary, other rehabilitative services, supervision or assistance to no more than eight (8) unrelated persons who, due to mental or physical disability, pregnancy or status as a minor who is unable to live with parents or guardians, reside together in a family-type environment as a single, housekeeping unit. Such a group home facility shall have the appearance of a conventional single-family residence with a single kitchen facility. Homes recognized as Oxford Homes shall be considered group homes. Excluded from the definition of group home facility are homes established for or occupied by residents who are permitted to live in "halfway houses" including residences in which the residents are criminal offenders in work-release sentence or on parole or probation, or persons who use or are addicted to a controlled substance. A group home facility shall be a permitted use only if it has received administrative approval from the Director of the Division of Planning and Zoning as set out in Section 405.078(8)\* and is operated in conformance with conditions and standards specified in that Subsection and all other applicable governmental regulations and requirements.<sup>31</sup>*

<sup>31</sup> St. Charles County Unified Development Ordinance, [www.sccmo.org](http://www.sccmo.org)

For the cities of St. Peters, Wentzville, Weldon Spring, Dardenne Prairie, Cottleville, and Lake St. Louis the definition of a “group home” is as follows:

*GROUP HOME: Any home in which eight (8) or fewer unrelated mentally or physically handicapped persons reside, and may include two (2) additional persons acting as houseparents or guardians who need not be related to each other or to any of the mentally or physically handicapped persons residing in the home.<sup>32</sup>*

Four of the examined jurisdictions (St. Charles County, St. Peters, Cottleville and Wentzville) permit group homes as of right within residential districts and three of the communities (Weldon Spring, Lake St. Louis, and Dardenne Prairie) require a special use permit to be obtained. The administrative burden required for the granting of a special use permit varies among the jurisdictions, but can be so cumbersome and costly as to prevent many would-be applicants from ever applying and instead seeking to locate elsewhere.

**Table 32: Group Home Requirements by Jurisdiction**

Group Home Requirements by Jurisdiction		
Jurisdiction	Permitted by Right	Special or Conditional Use Required
County	X	
St. Peters	X	
Wentzville	X	
Weldon Spring		X
Lake St. Louis		X
Cottleville	X	
Dardenne Prairie		X

Source: Land Development Ordinances for Multiple Jurisdictions through local websites

With regard to spacing requirements between group homes, St. Charles County’s ordinance was the least restrictive, with a 600 foot minimum. St. Peters, Cottleville, Wentzville, and Lake St. Louis all required a 2,500 foot minimum. In addition to requiring a special or conditional use permit for group homes, Weldon Spring and Dardenne Prairie, also impose a minimum spacing requirement of 5,000 feet, which is nearly a mile. In these relatively small jurisdictions (8.3 and 4.4 square miles, respectively) the 5,000 foot spacing requirement effectively places the vast majority of the jurisdiction off limits to group homes.

Requiring special permits and significant distances between group homes can hinder the inclusion of this use within a community. Such hurdles can be used as a way to discourage locally undesirable land uses (LULUs) from being sited in more affluent and politically powerful communities and neighborhoods. However, when viewing the entire urban county as a whole, by far, most of the urban county area (over 86%) is covered by zoning ordinance provisions requiring no special use permit and spacing requirements not exceeding 2,500 feet for group homes.

Since 2008, St. Charles County has received three applications for group homes with each receiving administrative approval. It appears that in some of the jurisdictions that permit group homes within residential districts, no records are maintained documenting where these uses have located or that they

<sup>32</sup> Local Land Use Ordinances Definitions section from the cities of St. Peters, Wentzville, Weldon Spring, Dardenne Prairie, Cottleville, and Lake St. Louis

comply with local regulations. However, this demonstrates that there have been no existing challenges to the current development regulations addressing group homes.

Each of the examined zoning ordinances, except for one, included zoning provisions for multifamily housing. The one exception, Weldon Spring, did provide for multi-family housing within planned residential districts. While multi-family zoning districts exist in most communities examined, getting property rezoned may become cumbersome in certain instances as this type of district could be considered an unwanted use in the neighborhood. Opposition to such proposals may be viewed as a NIMBY (Not in My Back Yard) response, potentially constituting an impediment to fair housing in those areas. The county and the respective jurisdictions located within are predominately developed as single-family detached housing units, consistent with a suburban development pattern, as the county immediately borders a large urban area. With high occupancy in multi-family housing developments and an increasing demand for rental housing, development opportunities may exist which will test the ability to obtain multifamily zoning.

All of the jurisdictions examined have minimum housing size standards within their zoning ordinances for single family and multifamily units. For example, in the County ordinance, 1,000 square feet is the minimum dwelling size in single family residential districts and multifamily residential must have 500 square foot minimum for 2 or more bedroom units, 400 square feet for one bedroom units, and 300 square feet for efficiency units.

Excessive size standards can create considerable difficulty to produce housing for all market segments, including affordable housing. The county regulations, which cover the greatest percentage of land area (86%), are not considered excessive or believed to hinder the development of affordable housing within the urban county. However, some local requirements requiring larger structure sizes will hinder some development types within their jurisdictions.

**Table 33: Residential Size Restrictions by District**

Dwelling Unit Size Restrictions in Local Zoning Ordinances (Square Footage)					
Jurisdiction	Minimum Single Family	Minimum Multi-Family	Multi-Family 2 or more Bedrooms	Multi-Family 1 Bedroom	Multi-Family Efficiency Unit
County	1000	--	500	400	300
St. Peters	1100	650			
Wentzville	1200	1200			
Weldon Spring	2000	N/A			
Lake St. Louis	1500	600			
Cottleville	1000	800			
Dardenne Prairie	1600	900			

Source: Land Development Ordinances for Multiple Jurisdictions through local websites

### ***Building and Housing Codes***

The building code ordinances in St. Charles County and the participating jurisdictions within the urban county provide the minimum standards to protect health, safety, and public welfare through structural strength, means of egress, stability, sanitation, adequate light and ventilation, and to provide safety to life and property from fire and other hazards attributed to the built environment. St. Charles County and the participating jurisdictions use, through formal adoptions by their governing bodies, the complete set of 2009 International Code Council (ICC) Building Code manuals, as well as the 2008 Electrical Code. The International Code Council's products are generally considered a "safe harbor" for compliance with the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) and accessibility requirements are incorporated into the International Codes as the codes are updated.<sup>33</sup>

### ***Land Development Regulations***

St. Charles County and the participating jurisdictions have subdivision regulations that provide standards to coordinate proposed road locations as part of a subdivision with other existing or planned roads, ensure adequate and timely construction of infrastructure, and encourage the best environment for the health, safety, convenience and prosperity of current and future residents. The St. Charles County zoning ordinance contains provisions that permit the developer of a proposed subdivision to designate up to 10% of the lots in the subdivision for two-family development at the time of platting. Lot size minimums are not changed from that of a single-family, which are found in the table above. The result has the potential to provide affordable units and to integrate them into a new area.

### ***Planning and Zoning Regulatory Bodies***

The members of the Board of Zoning Appeals, each representing a Council District, hear appeals and requests for variances from the Zoning Ordinance. The members of the Building Commission, each representing a specific area of technical expertise related to the building industry, hear appeals and requests for variances from the provisions of the Building Codes Ordinance. The Board meets only when there are requests or appeals filed and the meetings are scheduled as quickly as possible for the convenience of the applicant(s). The members of the St. Charles County Planning and Zoning Commission are appointed by the County Executive with approval from the County Council. To date, there have been no official complaints made against members of these bodies or with regard to the actions and decision taken by them. The participating jurisdictions each have similarly constituted boards and commissions.

Even though the members of these boards and commissions are selected from the population within their jurisdictions, they may not necessarily be representative of or conversant with the concerns of members of protected classes whose housing choices are impacted by their decisions. As a result, even though very well-meaning, the members of these boards and commissions may not serve the best interest of the most vulnerable and ill-housed in a community. This situation can be even more complicated if the members of these boards and committees tend to be chosen from the real estate and development professional communities. This can sometimes lead to conflicts of interest between the public and private interests in which case the private and short term interest will most likely be more articulately expressed and considered. That notwithstanding, however, there have been no complaints filed against any of these bodies.

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<sup>33</sup> International Code Council, *Accessibility Info*. <http://www.iccsafe.org/safety/pages/accessibility-1.aspx>.

### ***Fair Housing***

There is not a specific discussion of fair housing within the zoning codes of the jurisdictions of St. Charles County. Among the areas of fair housing that may be considered for inclusion is a discussion of handicapped parking requirements. Only within the UDO of St. Charles County were there specific regulations regarding handicapped parking requirements. The requirements, which reference ADA accessibility standards, include the minimum number of handicapped accessible parking spaces for multi-family units, which may be found in the St. Charles County UDO at [www.cd.sccmo.org](http://www.cd.sccmo.org).

### ***Summary of Findings***

After review and examination of local land use and zoning regulations, it is apparent that some municipal ordinances impose restrictions that constitute impediments to fair housing choice. Roughly 86% of the county's land area is governed by St. Charles County's relatively inclusive and permissive zoning codes. However, the zoning codes of Weldon Spring and Dardenne Prairie pose an impediment to the housing choice of those persons with disabilities who must live in group homes by requiring special permits for such residences to be located in residential areas and by mandating unreasonable spacing requirements. Lake St. Louis imposes a lower spacing requirement, but, like Weldon Spring and Dardenne Prairie does not permit group homes to be located as of right in any residential zones. These three municipalities also have high minimum square footage requirements (ranging from 1,500 to 2,000 square feet) for single family dwellings.

While there have not been any legal challenges reported in the jurisdictions that require special or conditional use permits for the siting of group homes, a tracking policy should be put in to place that would track approvals of group homes and the locations of each in the event that a challenge to the ordinance may arise. In addition, minimum distances between group homes should be reviewed to ensure that they are not overly restrictive.

Building codes and subdivision regulations in St. Charles County are generally compliant with federal laws related to fair housing and accessibility for people with disabilities. Several different bodies bear responsibility for interpretation and enforcement of zoning and land use regulations. There have been no official complaints made against members of these bodies or with regard to the actions and decision taken by them.

## **Current Impediments and Recommendations**

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This analysis has revealed impediments to fair housing choice in St. Charles County. In this section, the four overarching impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. St. Charles County has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

### **Impediment #1: Scarcity of Affordable Rental Units**

The affordability of housing in St. Charles County is a pressing concern among residents. Because demand for affordable rental units exceeds supply, vacancy rates are extremely low, allowing property owners to increase rents. The National Low Income Housing Coalition's data finds that 42% of renters in St. Charles County lack the income required to afford a two-bedroom apartment. Earning minimum wage, a resident would need to work 84 hours per week to afford a two-bedroom apartment. As cost tends to restrict housing choice, particularly for those with lower incomes, this cost burden impacts a household's ability to obtain affordable housing. Renters with incomes below 30% AMI (which includes those receiving SSI as their sole source of income) are especially impacted, as are large families who seek units with four or more bedrooms, as these units are generally more expensive. Additionally, stakeholder interviews conducted in conjunction with this Analysis indicate large numbers of residents living week-to-week in area hotels, either unable to accumulate the funds necessary for apartment deposits or unable to locate apartment vacancies in convenient areas. The lack of an adequate supply of housing affordable to the county's workforce can cause many service-sector and even some professional-sector workers to live long distances from the places they work, resulting in long commute times and inordinate strain on the County's infrastructure systems.

### **Recommendations:**

St. Charles County must actively work to address the need for more affordable rental housing by shifting some CDBG funding priorities from homeowner-oriented programs to programs supporting the creation and preservation of rental units or to programs making existing rental units more affordable to low-income households. To facilitate such a shift, the County should include in its 2014-2016 Consolidated Plan resources for a rental assistance activity. The County should consider opportunities to support Low Income Housing Tax Credit (LIHTC) projects proposed by developers in the County, either through letters of endorsement or the investment of CDBG funds, to the extent a nominal investment of CDBG funds may make a project application more competitive.

As the housing market begins to recover, a number of means are available to incentivize market-rate housing developers to incorporate affordable units in their developments that do not require any direct investment of County funds. Current County ordinance already provides some such opportunities, but a review of other additional concepts (such as inclusionary zoning provisions, waivers of water/sewer tap fees, and reduced setbacks), should be evaluated by County staff for feasibility.

## **Impediment #2: Local Attitudes Resisting Fair Housing Opportunities**

Evidence gathered from interviews, public meetings, and survey responses suggests a strong “Not In My Backyard” (NIMBY) attitude held by some St. Charles County residents. In the course of this Analysis, the NIMBY position was found in response to a wide variety of housing types, including multi-family housing, group homes, housing options for the homeless, and affordable housing in general. While it is important for citizens to be consulted in land use decisions in their communities, it is equally important that those citizens be knowledgeable of fair housing law. Where a residential land use is proposed in a residential area, it is problematic to yield to local resistance based on the type of people who will occupy the proposed housing.

Education and awareness of fair housing law is imperative to alleviating NIMBYism and discriminatory attitudes and should be an ongoing activity if it is to begin addressing the lack of general awareness concerning fair housing issues among residents and professionals in St. Charles County. As the County continues to grow and expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns. Additionally, fair housing education must be presented in a manner that is linguistically appropriate and culturally sensitive.

### **Recommendations:**

To combat the negative attitudes of some County residents toward various types of fair and affordable housing, the County must begin implementing a systematic model of fair housing education, beginning with the County’s Community Development staff and CDBG subrecipients. The County should collaborate with its FHEO and/or with local fair housing advocacy organizations on the development of an appropriate curriculum and then make it a mandatory requirement for staff, subrecipients, and any other entities the County may contract with under its CDBG program. Over time, the training program should be expanded and offered to the public, by holding workshops or by sending speakers to club meetings and other gatherings. Observance of Fair Housing Month each April is encouraged and should include a proclamation from County Council, a press release and an event drawing attention to the issue. The County should additionally consider setting aside a portion of its annual CDBG allocation as a fair housing grant, to be competitively awarded to nonprofits or other organizations that can assist the County in carrying out these recommendations.

## **Impediment #3: Restrictive Zoning for Group Homes**

An examination of local land use and zoning regulations finds that some municipal ordinances impose overly-restrictive conditions on the siting of group homes. Roughly 86% of the county’s land area is governed by St. Charles County’s relatively inclusive and permissive zoning codes. However, the zoning codes, for example, of Weldon Spring and Dardenne Prairie pose an impediment to the housing choice of those persons with disabilities who must live in group homes by requiring special permits for such residences to be located in residential areas and by mandating unreasonable spacing requirements. Lake St. Louis imposes a lower spacing requirement, but, like Weldon Spring and Dardenne Prairie does not permit group homes to be located as of right in any residential zones. The administrative burden required for the granting of a special use permit varies among the jurisdictions, but can be so cumbersome and costly as to prevent many would-be applicants from ever applying and instead seeking to locate elsewhere. These

zoning regulations pose a significant impediment to fair housing choice for some St. Charles County residents with mental or physical disabilities.

**Recommendations:**

It is recommended that the County convene a discussion among its key community stake holders of the effects of its own ordinance and the ordinances of the other jurisdictions making up the “urban county” on the location of group homes. To prepare for such a discussion, an examination of the market value of adjacent housing to group homes, legal issues and other considerations should be accomplished which would provide factual information on accommodating group homes.

**Impediment #4: Lack of Public Transportation Options**

Transportation links are essential components to successful fair housing. The issue at hand regarding transportation and fair housing choice revolves around the ease with which a resident can travel from home to work if he or she lives in a lower income area or an area of minority concentration. Residents who do not have access to commercial areas are limited in where they can shop for goods and services, as well as seek employment. The converse is true as well. Inadequate transportation routes limit the selection of housing to neighborhoods within transportation service areas and disproportionately affect low-income, disabled, and elderly residents.

Except for bus service within the City of St. Charles, there is no public transit system serving St. Charles County and the participating jurisdictions within the urban county. A St. Charles County Transit Plan for Intra-County Bus Service was presented to the St. Charles County Council on August 7, 2007, but County Council has taken no action on this proposed plan for transit service.

**Recommendations:**

The County’s Community Development Department should routinely review transportation planning efforts carried out by other County departments, the regional council of governments, and other planning bodies for opportunities to advocate public infrastructure improvements that align with the goal of expanding housing choice. Once the public and political support for a public transportation system emerges, it will be important for the County to heavily consult potential users in the design of the system, so as to be responsive to needs in terms of destinations and hours of operation.

While inherently limited by the amount of funding available, the County is making a positive step in the right direction with its CDBG-funded transportation programs for elderly, disabled, and low-income residents within St. Charles County participating jurisdictions. Funding and support for these programs should be continued.



## Conclusion

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Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified which restrict the housing choice available to residents of St. Charles County and further prevent them from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. St. Charles County will work diligently toward achieving Fair Housing Choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are systemic and will require effort from both private sector and public sector actors to correct. The County has an important role to play but cannot on its own bring about the change necessary to remove these barriers to fair housing choice.

The recommendations proposed in this document address impediments relative to the scarcity of affordable rental housing, local attitudes that resist fair housing types, restrictive zoning for group homes, and the lack of public transportation options. Implementation of the recommendations can assist St. Charles County in achieving the reality of being an open and inclusive community that truly embraces Fair Housing Choice for all its residents.